

U.S. Department of Labor

Occupational Safety and Health Administration
Fort Lauderdale Area Office
1000 S. Pine Island Road, Suite 100
Fort Lauderdale, Florida 33324-3904



October 25, 2019

American Sales and Management Organization
d/b/a Eulen America
Attn.: Gerry McGill, Director of Safety and Regulatory Compliance
7200 Corporate Center Drive, Suite 206
Miami, FL 33125

RE: Inspection #1403303

Dear Mr. McGill:

The investigation conducted on May 23rd, 2019, at Miami International Airport, Miami, Florida, disclosed the following hazards:

1. Employees were exposed to tripping hazards while working in high lift trucks in which the rear cab was full of blankets.
2. The high lift trucks did not have functional seatbelts and the inspections sheets were not accurate.

Since no specific OSHA standards apply, and it is not considered appropriate at this time to invoke Section 5(a)(1), the general duty clause of the Occupation Safety and Health Act, no citations will be issued for this hazard. However, in the interest of workplace safety and health, it is recommended that the company take the following steps voluntarily to eliminate or reduce employee exposure to the hazard described above:

1. Place all blankets in suitable containers so employees have a clear aisle to eliminate and/or reduce the potential for tripping hazards.
2. Ensure that lift trucks are equipped with seat belts and develop/implement an inspection process in which supervisory personnel verify that the high lift trucks are inspected and kept in good working conditions before being used by employees.

Under OSHA's inspection protocol, we may return to your work site in approximately one year to further examine the conditions above.

Your support in protecting the health and safety of your employees is necessary and appreciated. If you have any questions please do not hesitate to contact me.

This letter need not be posted.

Sincerely,


Condell Eastmond,
Area Director

U.S. Department of Labor
Occupational Safety and Health Administration
1000 South Pine Island Road
Suite 100
Fort Lauderdale, FL 33324



Citation and Notification of Penalty

To:
AMERICAN SALES AND MANAGEMENT
ORGANIZATION, LLC, dba Eulen America
and its successors
7200 Corporate Center Dr.
#206
Miami, FL 33125

Inspection Number: 1403303
Inspection Date(s): 05/23/2019 - 10/03/2019
Issuance Date: 10/25/2019

Inspection Site:
7200 Corporate Center Dr.
#206
Miami, FL 33126

The violation(s) described in this Citation and Notification of Penalty is (are) alleged to have occurred on or about the day(s) the inspection was made unless otherwise indicated within the description given below.

This Citation and Notification of Penalty (this Citation) describes violations of the Occupational Safety and Health Act of 1970. The penalty(ies) listed herein is (are) based on these violations. You must abate the violations referred to in this Citation by the dates listed and pay the penalties proposed, unless within 15 working days (excluding weekends and Federal holidays) from your receipt of this Citation and Notification of Penalty **you either call to schedule an informal conference (see paragraph below) or you mail a notice of contest to the U.S. Department of Labor Area Office at the address shown above.** Please refer to the enclosed booklet (OSHA 3000) which outlines your rights and responsibilities and which should be read in conjunction with this form. Issuance of this Citation does not constitute a finding that a violation of the Act has occurred unless there is a failure to contest as provided for in the Act or, if contested, unless this Citation is affirmed by the Review Commission or a court.

Posting - The law requires that a copy of this Citation and Notification of Penalty be posted immediately in a prominent place at or near the location of the violation(s) cited herein, or, if it is not practicable because of the nature of the employer's operations, where it will be readily observable by all affected employees. This Citation must remain posted until the violation(s) cited herein has (have) been abated, or for 3 working days (excluding weekends and Federal holidays), whichever is longer.

Informal Conference - An informal conference is not required. However, if you wish to have such a conference you may request one with the Area Director during the 15 working day contest period by calling 954-

424-0242. During such an informal conference you may present any evidence or views which you believe would support an adjustment to the citation(s) and/or penalty(ies).

If you are considering a request for an informal conference to discuss any issues related to this Citation and Notification of Penalty, you must take care to schedule it early enough to allow time to contest after the informal conference, should you decide to do so. Please keep in mind that a written letter of intent to contest must be submitted to the Area Director within 15 working days of your receipt of this Citation. The running of this contest period is not interrupted by an informal conference.

If you decide to request an informal conference, please complete, remove and post the Notice to Employees next to this Citation and Notification of Penalty as soon as the time, date, and place of the informal conference have been determined. Be sure to bring to the conference any and all supporting documentation of existing conditions as well as any abatement steps taken thus far. If conditions warrant, we can enter into an informal settlement agreement which amicably resolves this matter without litigation or contest.

Right to Contest – You have the right to contest this Citation and Notification of Penalty. You may contest all citation items or only individual items. You may also contest proposed penalties and/or abatement dates without contesting the underlying violations. Unless you inform the Area Director in writing that you intend to contest the citation(s) and/or proposed penalty(ies) within 15 working days after receipt, the citation(s) and the proposed penalty(ies) will become a final order of the Occupational Safety and Health Review Commission and may not be reviewed by any court or agency.

Penalty Payment – Penalties are due within 15 working days of receipt of this notification unless contested. (See the enclosed booklet and the additional information provided related to the Debt Collection Act of 1982.) Make your check or money order payable to “DOL-OSHA”. Please indicate the Inspection Number on the remittance. You can also make your payment electronically on www.pay.gov. On the left side of the pay.gov homepage, you will see an option to Search Public Forms. Type "OSHA" and click Go. From the results, click on **OSHA Penalty Payment Form**. The direct link is:

<https://www.pay.gov/paygov/forms/formInstance.html?agencyFormId=53090334>.

You will be required to enter your inspection number when making the payment. Payments can be made by credit card or Automated Clearing House (ACH) using your banking information. Payments of \$25,000 or more require a Transaction ID, and also must be paid using ACH. If you require a Transaction ID, please contact the OSHA Debt Collection Team at (202) 693-2170.

OSHA does not agree to any restrictions or conditions or endorsements put on any check, money order, or electronic payment for less than the full amount due, and will process the payments as if these restrictions or conditions do not exist.

Notification of Corrective Action – For each violation which you do not contest, you must provide ***abatement certification*** to the Area Director of the OSHA office issuing the citation and identified above. This abatement certification is to be provided by letter within 10 calendar days after each abatement date. Abatement certification includes the date and method of abatement. If the citation indicates that the violation was corrected during the inspection, no abatement certification is required for that item. The abatement certification letter must be posted at the location where the violation appeared and the corrective action took place or employees must otherwise be effectively informed about abatement activities. A sample abatement certification letter is enclosed with this Citation. In addition, where the citation indicates that ***abatement documentation*** is necessary, evidence of the purchase or repair of equipment, photographs or video, receipts, training records, etc., verifying that abatement has occurred is required to be provided to the Area Director.

Employer Discrimination Unlawful – The law prohibits discrimination by an employer against an employee for filing a complaint or for exercising any rights under this Act. An employee who believes that he/she has been discriminated against may file a complaint no later than 30 days after the discrimination occurred with the U.S. Department of Labor Area Office at the address shown above.

Employer Rights and Responsibilities – The enclosed booklet (OSHA 3000) outlines additional employer rights and responsibilities and should be read in conjunction with this notification.

Notice to Employees – The law gives an employee or his/her representative the opportunity to object to any abatement date set for a violation if he/she believes the date to be unreasonable. The contest must be mailed to the U.S. Department of Labor Area Office at the address shown above and postmarked within 15 working days (excluding weekends and Federal holidays) of the receipt by the employer of this Citation and Notification of Penalty.

Inspection Activity Data – You should be aware that OSHA publishes information on its inspection and citation activity on the Internet under the provisions of the Electronic Freedom of Information Act. The information related to these alleged violations will be posted when our system indicates that you have received this citation. You are encouraged to review the information concerning your establishment at www.osha.gov. If you have any dispute with the accuracy of the information displayed, please contact this office.

U.S. Department of Labor
Occupational Safety and Health Administration



NOTICE TO EMPLOYEES OF INFORMAL CONFERENCE

An informal conference has been scheduled with OSHA to discuss the citation(s) issued on 10/25/2019. The conference will be held by telephone or at the OSHA office located at 1000 South Pine Island Road, Suite 100, Fort Lauderdale, FL 33324 on _____ at _____.

Employees and/or representatives of employees have a right to attend an informal conference.

CERTIFICATION OF CORRECTIVE ACTION WORKSHEET

Inspection Number: 1403303

Company Name: AMERICAN SALES AND MANAGEMENT ORGANIZATION, LLC, dba Eulen America
Inspection Site: 7200 Corporate Center Dr., #206, Miami, FL 33126
Issuance Date: 10/25/2019

List the specific method of correction for each item on this citation in this package that does not read "Corrected During Inspection" and return to: **U.S. Department of Labor – Occupational Safety and Health Administration, 1000 South Pine Island Road, Suite 100, Fort Lauderdale, FL 33324**

Citation Number _____ and Item Number _____ was corrected on _____
By (Method of Abatement): _____

Citation Number _____ and Item Number _____ was corrected on _____
By (Method of Abatement): _____

Citation Number _____ and Item Number _____ was corrected on _____
By (Method of Abatement): _____

Citation Number _____ and Item Number _____ was corrected on _____
By (Method of Abatement): _____

Citation Number _____ and Item Number _____ was corrected on _____
By (Method of Abatement): _____

Citation Number _____ and Item Number _____ was corrected on _____
By (Method of Abatement): _____

I certify that the information contained in this document is accurate and that the affected employees and their representatives have been informed of the abatement.

Signature

Date

Typed or Printed Name

Title

NOTE: 29 USC 666(g) whoever knowingly makes any false statements, representation or certification in any application, record, plan or other documents filed or required to be maintained pursuant to the Act shall, upon conviction, be punished by a fine of not more than \$10,000 or by imprisonment of not more than 6 months or both.

POSTING: A copy of completed Corrective Action Worksheet should be posted for employee review

U.S. Department of Labor
Occupational Safety and Health Administration

Inspection Number: 1403303
Inspection Date(s): 05/23/2019 - 10/03/2019
Issuance Date: 10/25/2019



Citation and Notification of Penalty

Company Name: AMERICAN SALES AND MANAGEMENT ORGANIZATION, LLC, dba Eulen America

Inspection Site: 7200 Corporate Center Dr., #206, Miami, FL 33126

Citation 1 Item 1 Type of Violation: **Serious**

29 CFR 1910.212(a)(1): Machine guarding was not provided to protect operator(s) and other employees from hazard(s) created by:

On or about July 11, 2019, at terminal D in Miami International Airport, the driver was exposed to getting his fingers caught on the wire mesh that was on the back of the driver's seat as the driver raised the platform in the back of the truck.

Date By Which Violation Must be Abated:
Proposed Penalty:

11/21/2019
\$9472.00

See pages 1 through 4 of this Citation and Notification of Penalty for information on employer and employee rights and responsibilities.

U.S. Department of Labor
Occupational Safety and Health Administration

Inspection Number: 1403303
Inspection Date(s): 05/23/2019 - 10/03/2019
Issuance Date: 10/25/2019



Citation and Notification of Penalty

Company Name: AMERICAN SALES AND MANAGEMENT ORGANIZATION, LLC, dba Eulen America

Inspection Site: 7200 Corporate Center Dr., #206, Miami, FL 33126

Citation 1 Item 2 Type of Violation: **Serious**

29 CFR 1926.451(g)(4)(i): Guardrail systems were not installed along all open sides and ends of platforms (is applicable to the general industry standard by 29 CFR 1910.27(a) that incorporates the construction industry requirement):

On or about July 11, 2019, at terminal D in Miami International Airport, employees lowered the guardrail on the side platform to open the aircraft door and gain access to the interior, exposing the employees to a fall of approximately 15 feet.

ABATEMENT DOCUMENTATION REQUIRED FOR THIS ITEM

Date By Which Violation Must be Abated:

11/21/2019

Proposed Penalty:

\$13260.00

A handwritten signature in blue ink, appearing to read "C. Eastmond", written over a horizontal line.

Condell Eastmond
Area Director

See pages 1 through 4 of this Citation and Notification of Penalty for information on employer and employee rights and responsibilities.

U.S. Department of Labor
Occupational Safety and Health Administration
1000 South Pine Island Road
Suite 100
Fort Lauderdale, FL 33324



INVOICE / DEBT COLLECTION NOTICE

Company Name: AMERICAN SALES AND MANAGEMENT ORGANIZATION, LLC, dba Eulen America
Inspection Site: 7200 Corporate Center Dr., #206, Miami, FL 33126
Issuance Date: 10/25/2019

Summary of Penalties for Inspection Number	1403303
Citation 1, Serious	\$22732.00
TOTAL PROPOSED PENALTIES	\$22732.00

To avoid additional charges, please remit payment promptly to this Area Office for the total amount of the uncontested penalties summarized above. Make your check or money order payable to: "DOL-OSHA". Please indicate OSHA's Inspection Number (indicated above) on the remittance. You can also make your payment electronically on www.pay.gov. On the left side of the pay.gov homepage, you will see an option to Search Public Forms. Type "OSHA" and click Go. From the results, click on **OSHA Penalty Payment Form**. The direct link is <https://www.pay.gov/paygov/forms/formInstance.html?agencyFormId=53090334>. You will be required to enter your inspection number when making the payment. Payments can be made by credit card or Automated Clearing House (ACH) using your banking information. Payments of \$25,000 or more require a Transaction ID, and also must be paid using ACH. If you require a Transaction ID, please contact the OSHA Debt Collection Team at (202) 693-2170.

OSHA does not agree to any restrictions or conditions or endorsements put on any check, money order, or electronic payment for less than the full amount due, and will cash the check or money order as if these restrictions or conditions do not exist.

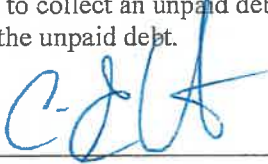
If a personal check is issued, it will be converted into an electronic fund transfer (EFT). This means that our bank will copy your check and use the account information on it to electronically debit your account for the amount of the check. The debit from your account will then usually occur within 24 hours and will be shown on your regular account statement. You will not receive your original check back. The bank will destroy your original check, but will keep a copy of it. If the EFT cannot be completed because of insufficient funds or closed account, the bank will attempt to make the transfer up to 2 times.

Pursuant to the Debt Collection Act of 1982 (Public Law 97-365) and regulations of the U.S. Department of Labor (29 CFR Part 20), the Occupational Safety and Health Administration is required to assess interest, delinquent charges, and administrative costs for the collection of delinquent penalty debts for violations of the Occupational Safety and Health Act.

Interest: Interest charges will be assessed at an annual rate determined by the Secretary of the Treasury on all penalty debt amounts not paid within one month (30 calendar days) of the date on which the debt amount becomes due and payable (penalty due date). The current interest rate is one percent (1%). Interest will accrue from the date on which the penalty amounts (as proposed or adjusted) become a final order of the Occupational Safety and Health Review Commission (that is, 15 working days from your receipt of the Citation and Notification of Penalty), unless you file a notice of contest. Interest charges will be waived if the full amount owed is paid within 30 calendar days of the final order.

Delinquent Charges: A debt is considered delinquent if it has not been paid within one month (30 calendar days) of the penalty due date or if a satisfactory payment arrangement has not been made. If the debt remains delinquent for more than 90 calendar days, a delinquent charge of six percent (6%) per annum will be assessed accruing from the date that the debt became delinquent.

Administrative Costs: Agencies of the Department of Labor are required to assess additional charges for the recovery of delinquent debts. These additional charges are administrative costs incurred by the Agency in its attempt to collect an unpaid debt. Administrative costs will be assessed for demand letters sent in an attempt to collect the unpaid debt.



Condell Eastmond
Area Director



Date

U.S. Department of Labor
Occupational Safety and Health Administration
1000 South Pine Island Road
Suite 100
Fort Lauderdale, FL 33324



Citation and Notification of Penalty

To:
AMERICAN SALES AND MANAGEMENT
ORGANIZATION, LLC, dba EULEN AMERICA
and its successors
7200 Corporate Center Drive
#206
Miami, FL 33125

Inspection Number: 1396157
Inspection Date(s): 04/26/2019 - 10/25/2019
Issuance Date: 10/25/2019

Inspection Site:
7200 NW 19th Street
Commercial Center
Miami, FL 33152

The violation(s) described in this Citation and Notification of Penalty is (are) alleged to have occurred on or about the day(s) the inspection was made unless otherwise indicated within the description given below.

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You will be required to enter your inspection number when making the payment. Payments can be made by credit card or Automated Clearing House (ACH) using your banking information. Payments of \$25,000 or more require a Transaction ID, and also must be paid using ACH. If you require a Transaction ID, please contact the OSHA Debt Collection Team at (202) 693-2170.

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Employer Discrimination Unlawful – The law prohibits discrimination by an employer against an employee for filing a complaint or for exercising any rights under this Act. An employee who believes that he/she has been discriminated against may file a complaint no later than 30 days after the discrimination occurred with the U.S. Department of Labor Area Office at the address shown above.

Employer Rights and Responsibilities – The enclosed booklet (OSHA 3000) outlines additional employer rights and responsibilities and should be read in conjunction with this notification.

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Inspection Activity Data – You should be aware that OSHA publishes information on its inspection and citation activity on the Internet under the provisions of the Electronic Freedom of Information Act. The information related to these alleged violations will be posted when our system indicates that you have received this citation. You are encouraged to review the information concerning your establishment at www.osha.gov. If you have any dispute with the accuracy of the information displayed, please contact this office.



NOTICE TO EMPLOYEES OF INFORMAL CONFERENCE

An informal conference has been scheduled with OSHA to discuss the citation(s) issued on 10/25/2019. The conference will be held by telephone or at the OSHA office located at 1000 South Pine Island Road, Suite 100, Fort Lauderdale, FL 33324 on _____ at _____.

Employees and/or representatives of employees have a right to attend an informal conference.

CERTIFICATION OF CORRECTIVE ACTION WORKSHEET

Inspection Number: 1396157

Company Name: AMERICAN SALES AND MANAGEMENT ORGANIZATION, LLC, dba EULEN AMERICA
Inspection Site: 7200 NW 19th Street, Commercial Center, Miami, FL 33152
Issuance Date: 10/25/2019

List the specific method of correction for each item on this citation in this package that does not read "Corrected During Inspection" and return to: **U.S. Department of Labor – Occupational Safety and Health Administration, 1000 South Pine Island Road, Suite 100, Fort Lauderdale, FL 33324**

Citation Number _____ and Item Number _____ was corrected on _____
By (Method of Abatement): _____

Citation Number _____ and Item Number _____ was corrected on _____
By (Method of Abatement): _____

Citation Number _____ and Item Number _____ was corrected on _____
By (Method of Abatement): _____

Citation Number _____ and Item Number _____ was corrected on _____
By (Method of Abatement): _____

Citation Number _____ and Item Number _____ was corrected on _____
By (Method of Abatement): _____

Citation Number _____ and Item Number _____ was corrected on _____
By (Method of Abatement): _____

I certify that the information contained in this document is accurate and that the affected employees and their representatives have been informed of the abatement.

Signature

Date

Typed or Printed Name

Title

NOTE: 29 USC 666(g) whoever knowingly makes any false statements, representation or certification in any application, record, plan or other documents filed or required to be maintained pursuant to the Act shall, upon conviction, be punished by a fine of not more than \$10,000 or by imprisonment of not more than 6 months or both.

POSTING: A copy of completed Corrective Action Worksheet should be posted for employee review



Citation and Notification of Penalty

Company Name: AMERICAN SALES AND MANAGEMENT ORGANIZATION, LLC, dba
EULEN AMERICA

Inspection Site: 7200 NW 19th Street, Commercial Center, Miami, FL 33152

Citation 1 Item 1 Type of Violation: **Serious**

OSH ACT of 1970 Section (5)(a)(1): The employer did not furnish employment and a place of employment which were free from recognized hazards that were causing or likely to cause death or serious physical harm to employees in that employees were exposed to excessive heat:

a) On or about July 11, 2019, at a jobsite located at Miami International Airport jobsite located at 2100 NW 42nd Ave, Miami, FL 33126, employees engaged in heavy material handling during ramp activities were exposed to the hazard of high ambient temperatures and/or working in direct sunlight, which produced Wet Bulb Globe Temperatures (WBGT) ranging from 81.8 degrees Fahrenheit to WBGT 84.7 degrees Fahrenheit, which exceeded the TLV of 79.8 degrees Fahrenheit. Such exposures may lead to the development of serious heat-related illnesses such as, but not limited to, heat cramps, heat exhaustion, heat stroke, and death.

b) On or about July 16, 2019, at a jobsite located at Miami International Airport jobsite located at 2100 NW 42nd Ave, Miami, FL 33126, employees engaged in heavy material handling during baggage activities were exposed to the hazard of indoor high ambient temperatures, which produced Wet Bulb Globe Temperatures (WBGT) ranging from 80 degrees Fahrenheit to WBGT 80.5 degrees Fahrenheit, which exceeded the TLV of 79.8 degrees Fahrenheit. Such exposures may lead to the development of serious heat-related illnesses such as, but not limited to, heat cramps, heat exhaustion, heat stroke, and death.

Feasible and acceptable methods to abate this hazard include, but are not limited to:

Provide and ensure affected personnel working in the field have adequate amounts of cool (50 degrees to 60 degrees F), potable water and electrolyte replacements (specific recommendation should be made by medical consultation) and require affected personnel to drink 5 to 7 ounces of fluid every 15 to 20 minutes rather than relying on thirst.

Develop and implement a process for identifying appropriate rest locations where they have adequate facilities for climate-controlled air or shade during the shift.

See pages 1 through 4 of this Citation and Notification of Penalty for information on employer and employee rights and responsibilities.

U.S. Department of Labor
Occupational Safety and Health Administration

Inspection Number: 1396157
Inspection Date(s): 04/26/2019 - 10/25/2019
Issuance Date: 10/25/2019



Citation and Notification of Penalty

Company Name: AMERICAN SALES AND MANAGEMENT ORGANIZATION, LLC, dba EULEN AMERICA

Inspection Site: 7200 NW 19th Street, Commercial Center, Miami, FL 33152

Develop and implement a system to alert employees to the heat index anticipated for the day and identify each precaution they should take to reduce the risk of heat-related illness.

Develop and implement a system to check and monitor employees when the National Weather Service heat advisories are in effect or when temperatures exceed or are expected to exceed 95 degrees, or the heat index exceeds or is expected to exceed 91 degrees.

Establish work rules that instruct employees to report to management heat stress symptoms and seek assistance and evaluation when experiencing them.

Conduct in-person evaluations of employees complaining of heat-related illness symptoms, and arrange for medical attention or other assistance as necessary. This may include providing first aid to the employee.

Train managers, supervisors, and employees in the measures to take to prevent heat-related illnesses, how to recognize, in themselves and others, the signs and symptoms of heat-related illnesses, and the procedures to follow when they or others are experiencing heat-related illnesses or emergencies, and the actions that should be taken in those situations, including first aid. Such training should be conducted annually in advance of the hot weather season and throughout the season when excessive heat is predicted. Ensure all trained personnel confirm their receipt and understanding of the training and ensure training records are maintained.

ABATEMENT DOCUMENTATION REQUIRED FOR THIS ITEM

Date By Which Violation Must be Abated:	11/21/2019
Proposed Penalty:	\$13260.00

See pages 1 through 4 of this Citation and Notification of Penalty for information on employer and employee rights and responsibilities.

U.S. Department of Labor
Occupational Safety and Health Administration

Inspection Number: 1396157
Inspection Date(s): 04/26/2019 - 10/25/2019
Issuance Date: 10/25/2019



Citation and Notification of Penalty

Company Name: AMERICAN SALES AND MANAGEMENT ORGANIZATION, LLC, dba
EULEN AMERICA

Inspection Site: 7200 NW 19th Street, Commercial Center, Miami, FL 33152

Citation 1 Item 2 Type of Violation: **Serious**

29 CFR 1910.95(c)(1): The employer did not administer a continuing, effective hearing conservation program as described in 29 CFR 1910.9(c) through (o) whenever employee noise exposures equal or exceed an 8-hour time-weighted average sound level of 85 decibels measured on the A scale, or equivalently a dose of fifty percent:

At a Miami International Airport jobsite located at 2100 NW 42nd Ave, Miami, FL 33126, the employer did not administer a continuing, effective hearing conservation program whenever employee noise exposures equaled or exceeded the 8-hour time-weighted average action level of 85 decibels measured on the A scale, or equivalently a dose of fifty percent. The following monitored employees exceeded the action level (all exposure calculations included a zero increment for the time not sampled):

a) A ramp agent was exposed to a continuous noise of 87.5 dBA or the equivalent noise dose of 71% during the 369 minute sampling period on or about July 10, 2019.

b) A ramp agent was exposed to a continuous noise of 88.1 dBA or the equivalent noise dose of 77.2% during the 462 minute sampling period on or about July 17, 2019.

ABATEMENT DOCUMENTATION REQUIRED FOR THIS ITEM

Date By Which Violation Must be Abated:

11/21/2019

Proposed Penalty:

\$13260.00

See pages 1 through 4 of this Citation and Notification of Penalty for information on employer and employee rights and responsibilities.

U.S. Department of Labor
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Issuance Date: 10/25/2019



Citation and Notification of Penalty

Company Name: AMERICAN SALES AND MANAGEMENT ORGANIZATION, LLC, dba
EULEN AMERICA
Inspection Site: 7200 NW 19th Street, Commercial Center, Miami, FL 33152

Citation 1 Item 3 Type of Violation: **Serious**

29 CFR 1910.141(a)(5): A continuing and effective extermination program was not instituted where rodents, insects, or other vermin were detected:

On or about July 10, 2019, at a Miami International Airport jobsite located at 2100 NW 42nd Ave, Miami, FL 33126, the employer did not have an effective extermination control program for employees exposed to a sanitation health hazards from insects including, but not limited to an infestation of cockroaches to prevent the entrance and harborage of cockroaches.

ABATEMENT DOCUMENTATION REQUIRED FOR THIS ITEM

Date By Which Violation Must be Abated:	11/21/2019
Proposed Penalty:	\$13260.00

See pages 1 through 4 of this Citation and Notification of Penalty for information on employer and employee rights and responsibilities.



Citation and Notification of Penalty

Company Name: AMERICAN SALES AND MANAGEMENT ORGANIZATION, LLC, dba
EULEN AMERICA

Inspection Site: 7200 NW 19th Street, Commercial Center, Miami, FL 33152

The alleged violations below have been grouped because they involve similar or related hazards that may increase the potential for injury or illness.

Citation 1 Item 4 a Type of Violation: **Serious**

29 CFR 1910.1030(c)(1): 29 CFR 1910.1030(c)(1)(I): The employer who had employees(s) with occupational exposure to blood, bloodborne pathogens, or other potentially infectious materials, did not establish a written Exposure Control Plan to eliminate or minimize employee exposure:

On or about July 9, 2019, at a Miami International Airport jobsite located at 2100 NW 42nd Ave, Miami, FL 33126, the employer did not develop and implement a written Exposure Control Plan for employees who are exposed to occupational bloodborne pathogens and other potentially infectious materials, when handling sharps and cleaning up human blood.

ABATEMENT DOCUMENTATION REQUIRED FOR THIS ITEM

Date By Which Violation Must be Abated:	11/21/2019
Proposed Penalty:	\$13260.00

See pages 1 through 4 of this Citation and Notification of Penalty for information on employer and employee rights and responsibilities.

U.S. Department of Labor
Occupational Safety and Health Administration

Inspection Number: 1396157
Inspection Date(s): 04/26/2019 - 10/25/2019
Issuance Date: 10/25/2019



Citation and Notification of Penalty

Company Name: AMERICAN SALES AND MANAGEMENT ORGANIZATION, LLC, dba
EULEN AMERICA

Inspection Site: 7200 NW 19th Street, Commercial Center, Miami, FL 33152

Citation 1 Item 4 b Type of Violation: **Serious**

29 CFR 1910.1030(f)(2)(i): Hepatitis B vaccination was not made available within 10 working days of initial assignment to all employee(s) with occupational exposure:

On or about July 9, 2019, at a Miami International Airport jobsite located at 2100 NW 42nd Ave, Miami, FL 33126, the employer did not provide Hepatitis B vaccination and did not make it available within 10 working days of initial assignment to all employee(s) with occupational exposure when handling sharps, and cleaning up human blood.

ABATEMENT DOCUMENTATION REQUIRED FOR THIS ITEM

Date By Which Violation Must be Abated:

11/21/2019

See pages 1 through 4 of this Citation and Notification of Penalty for information on employer and employee rights and responsibilities.

U.S. Department of Labor
Occupational Safety and Health Administration

Inspection Number: 1396157
Inspection Date(s): 04/26/2019 - 10/25/2019
Issuance Date: 10/25/2019



Citation and Notification of Penalty

Company Name: AMERICAN SALES AND MANAGEMENT ORGANIZATION, LLC, dba
EULEN AMERICA

Inspection Site: 7200 NW 19th Street, Commercial Center, Miami, FL 33152

Citation 1 Item 4 c Type of Violation: **Serious**

29 CFR 1910.1030(g)(2)(i): The employer did not ensure that each employee with occupational exposure participated in a training program:

On or about July 9, 2019, at a Miami International Airport jobsite located at 2100 NW 42nd Ave, Miami, FL 33126, the employer did not provide employees who are exposed to bloodborne pathogens including, but not limited to while handling sharps and cleaning up human blood were trained in occupational bloodborne pathogens.

ABATEMENT DOCUMENTATION REQUIRED FOR THIS ITEM

Date By Which Violation Must be Abated:

11/21/2019

See pages 1 through 4 of this Citation and Notification of Penalty for information on employer and employee rights and responsibilities.

U.S. Department of Labor
Occupational Safety and Health Administration

Inspection Number: 1396157
Inspection Date(s): 04/26/2019 - 10/25/2019
Issuance Date: 10/25/2019



Citation and Notification of Penalty

Company Name: AMERICAN SALES AND MANAGEMENT ORGANIZATION, LLC, dba
EULEN AMERICA

Inspection Site: 7200 NW 19th Street, Commercial Center, Miami, FL 33152

Citation 2 Item 1 Type of Violation: **Other-than-Serious**

29 CFR 1910.134(c)(2)(i): Respirator users were not provided with the information contained in Appendix D to 29 CFR 1910.134 when the employer determined that any voluntary respirator use was permissible:

On or about July 9, 2019, at a Miami International Airport jobsite located at 2100 NW 42nd Ave, Miami, FL 33126, the employer did not provide the information contained in Appendix D of 29 CFR 1910.134, for employees voluntarily wearing N95 filtering facepiece respirators.

Date By Which Violation Must be Abated:
Proposed Penalty:

11/21/2019
\$1063.00

See pages 1 through 4 of this Citation and Notification of Penalty for information on employer and employee rights and responsibilities.

U.S. Department of Labor
Occupational Safety and Health Administration

Inspection Number: 1396157
Inspection Date(s): 04/26/2019 - 10/25/2019
Issuance Date: 10/25/2019



Citation and Notification of Penalty

Company Name: AMERICAN SALES AND MANAGEMENT ORGANIZATION, LLC, dba
EULEN AMERICA

Inspection Site: 7200 NW 19th Street, Commercial Center, Miami, FL 33152

The alleged violations below have been grouped because they involve similar or related hazards that may increase the potential for injury or illness.

Citation 2 Item 2 a Type of Violation: **Other-than-Serious**

29 CFR 1910.1200(g)(8): The employer did not maintain in the workplace copies of the required safety data sheets for each hazardous chemical:

On or about July 9, 2019, at a Miami International Airport jobsite located at 2100 NW 42nd Ave, Miami, FL 33126, the employer did not maintain copies of the required safety data sheets for each hazardous chemicals including, but not limited to, Clorox Germicidal Bleach (a corrosive, with a pH 12); Lysol Brand Mold & Mildew Blaster Bleach & Shine (a corrosive, with a pH between 12.3 - 12.7); and Purple Power Concentrated Industrial Strength Cleaner/Degreaser, (a corrosive, with a pH 12.98), for employees who are required to use while performing cleaning activities.

Date By Which Violation Must be Abated:
Proposed Penalty:

11/21/2019
\$1063.00

See pages 1 through 4 of this Citation and Notification of Penalty for information on employer and employee rights and responsibilities.

U.S. Department of Labor
Occupational Safety and Health Administration

Inspection Number: 1396157
Inspection Date(s): 04/26/2019 - 10/25/2019
Issuance Date: 10/25/2019



Citation and Notification of Penalty

Company Name: AMERICAN SALES AND MANAGEMENT ORGANIZATION, LLC, dba
EULEN AMERICA

Inspection Site: 7200 NW 19th Street, Commercial Center, Miami, FL 33152

Citation 2 Item 2 b Type of Violation: **Other-than-Serious**

29 CFR 1910.1200(h)(1): Employees were not provided effective information and training on hazardous chemicals in their work area at the time of their initial assignment and whenever a new hazard that the employees had not been previously trained about was introduced into their work area:

On or about July 9, 2019, at a Miami International Airport jobsite located at 2100 NW 42nd Ave, Miami, FL 33126, the employer did not provide effective information and training for employees who were required to work with hazardous chemicals including, but not limited to, Clorox Germicidal Bleach (a corrosive, with a pH 12); Lysol Brand Mold & Mildew Blaster Bleach & Shine (a corrosive, with a pH between 12.3 - 12.7); and Purple Power Concentrated Industrial Strength Cleaner/Degreaser, (a corrosive, with a pH 12.98).

Date By Which Violation Must be Abated:

11/21/2019

See pages 1 through 4 of this Citation and Notification of Penalty for information on employer and employee rights and responsibilities.

U.S. Department of Labor
Occupational Safety and Health Administration

Inspection Number: 1396157
Inspection Date(s): 04/26/2019 - 10/25/2019
Issuance Date: 10/25/2019



Citation and Notification of Penalty

Company Name: AMERICAN SALES AND MANAGEMENT ORGANIZATION, LLC, dba
EULEN AMERICA

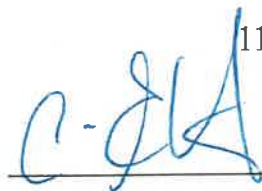
Inspection Site: 7200 NW 19th Street, Commercial Center, Miami, FL 33152

Citation 2 Item 2 c Type of Violation: **Other-than-Serious**

29 CFR 1910.1200(h)(3)(iv): The details of the hazard communication program developed by the employer, did not include an explanation of the labels received on shipped containers and the workplace labeling system used by their employer; the safety data sheet, including the order of information and how employee could obtain and use the appropriate hazard information.

On or about July 9, 2019, at a Miami International Airport jobsite located at 2100 NW 42nd Ave, Miami, FL 33126, the employer did not ensure GHS (Pictograms, SDSs and new labeling) information training requirements under the 2012 Hazard Communication Standard were provided for employees exposed to hazardous chemicals including, but not limited to, Clorox Germicidal Bleach (a corrosive, with a pH 12); Lysol Brand Mold & Mildew Blaster Bleach & Shine (a corrosive, with a pH between 12.3 - 12.7); and Purple Power Concentrated Industrial Strength Cleaner/Degreaser, (a corrosive, with a pH 12.98).

Date By Which Violation Must be Abated:

 11/21/2019

Condell Eastmond
Area Director

See pages 1 through 4 of this Citation and Notification of Penalty for information on employer and employee rights and responsibilities.

U.S. Department of Labor
Occupational Safety and Health Administration
1000 South Pine Island Road
Suite 100
Fort Lauderdale, FL 33324



INVOICE / DEBT COLLECTION NOTICE

Company Name: AMERICAN SALES AND MANAGEMENT ORGANIZATION, LLC, dba
EULEN AMERICA
Inspection Site: 7200 NW 19th Street, Commercial Center, Miami, FL 33152
Issuance Date: 10/25/2019

Summary of Penalties for Inspection Number	1396157
Citation 1, Serious	\$53040.00
Citation 2, Other-than-Serious	\$2126.00
TOTAL PROPOSED PENALTIES	\$55166.00

To avoid additional charges, please remit payment promptly to this Area Office for the total amount of the uncontested penalties summarized above. Make your check or money order payable to: "DOL-OSHA". Please indicate OSHA's Inspection Number (indicated above) on the remittance. You can also make your payment electronically on www.pay.gov. On the left side of the pay.gov homepage, you will see an option to Search Public Forms. Type "OSHA" and click Go. From the results, click on **OSHA Penalty Payment Form**. The direct link is <https://www.pay.gov/paygov/forms/formInstance.html?agencyFormId=53090334>. You will be required to enter your inspection number when making the payment. Payments can be made by credit card or Automated Clearing House (ACH) using your banking information. Payments of \$25,000 or more require a Transaction ID, and also must be paid using ACH. If you require a Transaction ID, please contact the OSHA Debt Collection Team at (202) 693-2170.

OSHA does not agree to any restrictions or conditions or endorsements put on any check, money order, or electronic payment for less than the full amount due, and will cash the check or money order as if these restrictions or conditions do not exist.

If a personal check is issued, it will be converted into an electronic fund transfer (EFT). This means that our bank will copy your check and use the account information on it to electronically debit your account for the amount of the check. The debit from your account will then usually occur within 24 hours and will be shown on your regular account statement. You will not receive your original check back. The bank will destroy your

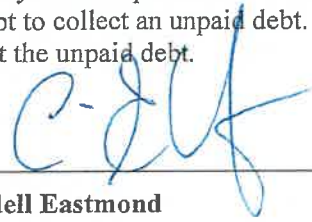
original check, but will keep a copy of it. If the EFT cannot be completed because of insufficient funds or closed account, the bank will attempt to make the transfer up to 2 times.

Pursuant to the Debt Collection Act of 1982 (Public Law 97-365) and regulations of the U.S. Department of Labor (29 CFR Part 20), the Occupational Safety and Health Administration is required to assess interest, delinquent charges, and administrative costs for the collection of delinquent penalty debts for violations of the Occupational Safety and Health Act.


Interest: Interest charges will be assessed at an annual rate determined by the Secretary of the Treasury on all penalty debt amounts not paid within one month (30 calendar days) of the date on which the debt amount becomes due and payable (penalty due date). The current interest rate is one percent (1%). Interest will accrue from the date on which the penalty amounts (as proposed or adjusted) become a final order of the Occupational Safety and Health Review Commission (that is, 15 working days from your receipt of the Citation and Notification of Penalty), unless you file a notice of contest. Interest charges will be waived if the full amount owed is paid within 30 calendar days of the final order.

Delinquent Charges: A debt is considered delinquent if it has not been paid within one month (30 calendar days) of the penalty due date or if a satisfactory payment arrangement has not been made. If the debt remains delinquent for more than 90 calendar days, a delinquent charge of six percent (6%) per annum will be assessed accruing from the date that the debt became delinquent.

Administrative Costs: Agencies of the Department of Labor are required to assess additional charges for the recovery of delinquent debts. These additional charges are administrative costs incurred by the Agency in its attempt to collect an unpaid debt. Administrative costs will be assessed for demand letters sent in an attempt to collect the unpaid debt.



Condell Eastmond
Area Director



Date