

BEFORE THE
STATE OF CALIFORNIA
OCCUPATIONAL SAFETY AND HEALTH
APPEALS BOARD

In the Matter of the Appeal of:

KEY ENERGY SERVICES, LLC.
5080 California Avenue
Bakersfield, CA 93309,

Employer.

**DOCKETS 13-R4D3-2239
through 2242**

DECISION

Statement of the Case

Key Energy Services (hereinafter referred to as Employer or Key Energy) provides services for oil rigs and oil wells, such as “fishing.”¹ Beginning December 12, 2012, the Division of Occupational Safety and Health (the Division) through associate safety engineer Terry Hammer (Hammer), conducted an accident inspection at the Hartman Well, Ventura 93001 (the site), where Employer was providing services. On June 7, 2013, the Division cited Employer for one regulatory and three serious violations²:

- Citation 1, Item 1, a Regulatory violation of Section 14300.29(a) (Failure to fully complete forms 300 for the years 2010 through 2012) with a proposed penalty of \$450;
- Citation 2, a Serious violation of Section 6507 (failure to identify the workplace hazard posed by the mud bucket and failure to train an employee on the safe use of the mud bucket) with a proposed penalty of \$8,100;
- Citation 3, a Serious, accident-related violation of Section 3328(e) (failure to ensure that the mud bucket was designed for the use

¹ “Fishing” is an operation to remove equipment (typically tools or a piece of tubing) that has become lodged in the well bore.

² Citation 4, alleging a serious, accident-related violation of Section 6646(d) (failure to ensure that the oil saver/mud bucket was properly installed and maintained) with a proposed penalty of \$18,000, was withdrawn due to duplication with Citation 3.

intended and properly secured to minimize the hazards associated with loosening or falling with a proposed penalty of \$18,000.

Employer filed a timely appeal contesting the violations, the classifications, the reasonableness of all proposed penalties, and the abatement requirements. Employer also alleged nine separate affirmative defenses including the statute of limitations. Early in the proceedings Employer stipulated that abatement was no longer an issue.

Prior to the hearing in this matter, the Division moved to reduce the classification of Citation 2 from Serious to General, and reduce the penalty from \$8,100 to \$750. Finally, the Division moved to omit the word “drill” before tubing in the alleged violation description (AVD) for Citations 2 and 3. There being no objection to the motions, they were granted.

Therefore, only Citations 1, 2 and 3 remained at issue when the hearing record opened, and the only serious citation remaining was Citation 3.

This matter came on regularly for hearing before Sandra L. Hitt, Administrative Law Judge (ALJ) of the California Occupational Safety and Health Appeals Board, at West Covina, California on December 11 and 12, 2013.³ William A. Bruce, Esq. and John F. Martin, Esq. represented Employer. Kathryn Woods, Staff Counsel, and Melissa Peters, Staff Counsel, represented the Division. The parties presented oral and documentary evidence on the hearing date. The parties were given until January 24, 2014, to file written closing briefs. On her own motion, the ALJ extended submission of the matter to September 14, 2014.

The parties stipulated that the penalties were calculated in accordance with the Division’s policies and procedures.

Issues

1. Was Citation 1, Item 1 issued within six months of any violation?
2. Did Employer fully complete Cal/OSHA Form 300 for the year 2012?
3. Did Employer implement procedures for identifying and evaluating work place hazards?

³ Exhibits received and testifying witnesses are listed in Appendix A. Certification of the Record is signed by the ALJ.

4. Did Employer train the injured employee on the safe use of the mud bucket⁴?
5. Was the mud bucket designed so as to minimize hazards caused by breakage, release of mechanical energy or loosening and/or falling?
6. Do the securing requirements of Section 3328 apply to these facts?
7. Were the penalties proposed for each alleged violation reasonable?

Findings of Fact

1. Norberto Gomez (Gomez) was an employee of Key Energy Services LLC on December 10, 2012.
2. On December 10, 2012, Gomez was injured at the workplace (oil rig 449 on the AERA lease in Ventura County).
3. On the day of the accident, workers were performing a “fishing” operation in the well to remove a clog.
4. The accident happened when a sudden release of pressure from the well occurred, blowing the mud bucket skyward.
5. The pressure release from the well was caused by trapped gas and fluids, not a release of mechanical energy.
6. There was no evidence that the mud bucket was in place/in use on the tubing when the pressure release occurred.
7. Citation 1 was issued within six months of the December 10, 2012 entry on Employer’s Form 300.
8. In the December 10, 2012 entry on Form 300, Employer did not identify, in column F, the object or substance that injured the employee.
9. On the date of the accident, Employer had in place procedures to identify and evaluate hazards.
10. Employer did not train Employee on the safe use of the mud bucket.

Analysis

Issue 1: Was Citation 1, Item 1 issued within six months of any violation?

Employer argued that Citation 1 was barred by the statute of limitations as set forth in *AKM LLC dba Volks Constructors v. Sec’y of Labor*, 675 F.23d 752 (D.C. Cir. 2012) and California Labor Code Section 6317.

California Labor Code Section 6317 states, “No citation or notice shall be issued by the division for a given violation or violations after six months have elapsed since occurrence of the violation.” Section 6317 accordingly

⁴ A “mud bucket” is also called a “wet box.” The mud bucket consists of opening sides, a handle, and a rod which functions as a latch. It is a cylinder open at the top and bottom, with the handle on the side, in the shape of a (very large) coffee mug.

bars any citations based on alleged violations older than six months from the occurrence of the violation, including any recordkeeping violations older than six months.

In response to a Division request, Employer sent the Division its OSHA 300 logs for several years (Division's Exhibit M)⁵. The last entry on Employer's Form 300 was December 10, 2012, listing the injury to Gomez. Thus, in order for any citation to be issued within six months, it would have had to be issued by June 10, 2012, at the latest, based upon the December 10, 2012 entry. The citations were issued on June 7, 2012. Therefore, the December 10, 2012 entry was within the statute of limitations. While both parties devoted much time to arguing whether *Volks* applied here, we need not reach that issue because Citation 1, Item 1 was issued within six months of the last entry on Employer's 2012 Form 300.

Insofar as Citation 1 is based upon the December 10, 2012 entry on Employer's form 300, it is not barred by the statute of limitations.

Issue 2: Did Employer fully complete Cal/OSHA Form 300 for the year 2012?

The AVD states:

On December 12, 2012, the Division initiated an inspection. The Division determined that the employer did not fully complete the OSHA form 300 for calendar years 2010-2012. The employer used Form 300 and did not completely fill out column F.

Section 14300.29 (a) provides in pertinent part:

Basic Requirement. You must use Cal/OSHA 300, 300A and 301 forms, or equivalent forms, for recordable injuries and illnesses. The Cal/OSHA Form 300A is called the Log of Work-Related Injuries and Illnesses, and the Cal/OSHA Form 301 is called the Injury and Illness Incident Report. Appendices A through C give samples of the Cal/OSHA forms. Appendices D through F provide elements for development of equivalent forms consistent with Section 14300.29(b)(4).

⁵ Typically the Division's exhibits are given numbers and Employer's exhibits are given letters, but in this case, Employer already had numbered its exhibits.

The requirements of section 14300.29(a) are straightforward: every employer must use the Cal/OSHA form 300 to report every “reportable” injury and illness. Recording criteria for workplace injuries are defined in sections 14300.45, 14300.5, 14300.6 and several that follow. Appendix A to section 14300.29 provides the format for Form 300. In Appendix A, the notation at the head of column (f) states: “Describe injury or illness, parts of body affected, and object/substance that directly injured or made person ill.”

On Employer’s 2012 form 300, there was an entry indicating an injury to Norberto Gomez on December 10, 2012, but there was no entry in column F to indicate the “object...that directly injured” Gomez. The factual allegation of the citation was accurate. This failure to insert information in column F for the Gomez injury was a violation of section 14300.29(a).

Employer argued that it was not required to make an entry in column F, because nothing in Section 14300.29(a) requires completing column F on the 300 logs. Employer argued that Section 14300.29(a) requires only that employers use forms 300 (or their equivalent) to record employee injuries and illnesses, as the instructions state: “You must enter information about your establishment at the top of the Cal/OSHA Form 300 by entering a one or two line description for each recordable injury or illness, and summarizing this information on the Cal/OSHA form 300A at the end of the year.”

Employer’s argument fails. It would be pointless to require employers to *use* the form 300, but not require them to fill it out correctly and completely. Form 300, on its face (Column F), requires an employer to describe the injury or illness, parts of body affected, and object/substance that directly injured or made a person ill. The instructions for completing the forms 300 state that an equivalent form is one that has the *same* information.... Employers are required to summarize the information from the form 300 on the form 300A at the end of the year (Section 14300.29(b)). If the information is not on the form 300 to begin with, it cannot very well be summarized on form 300A.

Even if Employer were unsure as to what actually caused the injury on December 10, 2102, Employer could have recorded “unknown” in column “F”. The evidence indicates however, that the failure to identify, in column F, the object or substance that caused the December 10, 2012 injury was not an aberration due to uncertainty. Employer had not completed column “F” for any of the other injuries/illnesses reflected in the forms 300 provided.

The evidence supports the citation. The appeal of Citation 1, Item 2 is denied.

Issue 3: Did Employer implement procedures for identifying and evaluating work place hazards?

Section 6507 states: “The employer shall implement and maintain an Injury and Illness Prevention Program [IIPP] in accordance with the requirements of Section 3203 of the General Industry Safety Orders.” Citation 2 references Section 3203(a) (4) and (7).

Section 3203(a)(4) requires the inclusion in the IIPP of “procedures for identifying and evaluating work place hazards including scheduled periodic inspections to identify unsafe conditions and work practices. Inspections shall be made to identify and evaluate hazards.”

The AVD for Citation 2, instance 1 (as amended) states:

Instance 1:

On or before December 10, 2012, the employer, Key Energy Services LLC, had not identified and evaluated the work place hazard of placing a mud bucket at the connection of tubing resulting in a serious injury. On December 10, 2012, an employee placed a mud bucket at the connection of tubing; the release of pressure from the tubing connection caused the mud bucket to become disengaged from the tubing striking the employee’s forehead resulting in a skull fracture.

Section 3203(4) does not require the identification of every hazard. “What is required is for Employer to have procedures in place for identifying and evaluating workplace hazards, and these procedures are to include “scheduled periodic inspections.” *Brunton Enterprises, Inc.*, Cal/OSHA App. 08-3445, Decision After Reconsideration (October 11, 2013).

In *Brunton*, the Appeals Board granted an employer’s appeal of a citation for violation of 3203(a)(4), where there was evidence of the employer’s failure to take steps to eliminate a specific hazard in a specific operation. The Board wrote: “[T]he division’s testimony regarding the lack of specific procedures for the operation at hand is not relevant and the evidence in the record does not otherwise disclose that Employer’s IIPP lacked procedures to identify and evaluate hazards.”

The circumstances are similar here. Employer had in place procedures to identify and evaluate hazards. Frank Dorado (Dorado), Key Energy’s Senior Safety Advisor, testified that the pressure in the well is measured by a gage

and checked. What is more, Dorado testified Employer has monthly safety meetings and daily tailgate meetings and that every employee is engaged in “hazard hunts” to identify any new hazards. Dorado testified he inspected the mud box Gomez used on the day of the accident and that Gomez also would have inspected the mud box. Dorado testified that the mud box was in good working order before the accident. Dorado’s testimony establishes that Employer had in place procedures for identifying and evaluating hazards.

Therefore instance 1 does not establish a violation of Section 6507.

Issue 4: Did Employer train the injured employee on the safe use of the mud bucket?

Citation 2, Instance 2 refers to Section 3203(a)(7).

Section 3203(a)(7) requires that employers provide training and instruction:

- (A) When the program is first established;
- (B) To all new employees
- (C) To all employees given new job assignments for which training has not previously been received;
- (D) Whenever new substances, processes, procedures or equipment are introduced to the workplace and represent a new hazard;
- (E) Whenever the employer is made aware of a new or previously unrecognized hazard; and,
- (F) For supervisors to familiarize themselves with the safety and health hazards to which employees under their immediate direction and control may be exposed.

The AVD for Citation 2, instance 2 (as amended) states:

Instance 2:

On or before the day of the accident, December 10, 2012, the employer, Key Energy Services had not trained and instructed their employee on the safe use and placement of mud buckets. An employee placed a mud bucket at the connection of tubing which became disengaged from the tubing with the release of pressure from the tubing connection, causing the mud bucket to become air borne striking the employee’s forehead resulting in a skull fracture.

An employer that does not train an employee regarding the hazards of a new assignment violates section 1509(a). *A. Teichert & Son, Inc.* Cal/OSHA App. 05-2650, Decision After Reconsideration (Sept. 12, 2012). Gomez testified that he had been working for Key Energy Services for approximately nine years and held the position of floor hand at the time of the accident. He had used a mud-bucket before, but learned how to do it by watching--he was never trained in the use of the mud bucket. A condition that does not comply with a standard issued under the California Occupational Safety and Health Act violates the Act until abated. *United Airlines, Inc.*, Cal/OSHA App. 83-595, Decision After Reconsideration (Apr. 24, 1986). See, also, *Pacific Telephone Co. dba AT&T* Cal/OSHA App. 06-5052 Decision After Reconsideration (August 11, 2011). Therefore, even though the task was not new to Gomez on the date of the accident, at some point it had been, and the failure to train was a continuing violation which places it within the statute of limitations.

There were hazards associated with the mud bucket. Gomez testified there were pinch points on the mud bucket and there was a hazard of slipping on the wet rig floor while installing the mud bucket. At hearing, when he was asked to demonstrate the placing of the mud bucket on the pipe, he did not want to do it without gloves, underscoring the point that the pinch points could present a hazard. Employer's Safety Captain, Edward Hernandez, testified there were hazards for pinch points between the tubing and the wet box and between the latch and the wet box. As of the date of the accident, the violation had not been abated, because Gomez never had been trained regarding the hazards associated with the mud bucket.⁶ Gomez's testimony that he had never been trained on the use of the mud bucket was credited and this evidence supports a violation of section 6507.

Issue 5: Was the mud bucket designed so as to minimize hazards caused by breakage, release of mechanical energy or loosening and/or falling?

Section 3328(e) provides:

Machinery and equipment components shall be designed and secured or covered (or both) to minimize hazards caused by breakage, release of mechanical energy (e.g. broken springs) or

⁶ Dorado testified that he put "wet box hazards" on the "job plan" (Exhibit 13). However, the page or pages of the job plan which would have referred to "wet-box hazards" were illegible and therefore the document could be given no weight.

loosening and/or falling unless the employer can demonstrate that to do so would be inconsistent with the manufacturer's recommendations or would otherwise impair employee safety.

The AVD (as amended) states:

On the day of the accident, December 10, 2012, the employer, Key Energy Services, LLC, did not ensure that the mud bucket that had been placed at the connection of tubing was properly designed for the work intended. The employer also did not ensure that the mud bucket was properly secured to minimize the hazards associated with the release of pressure from the connection of the tubing being broken. The release of pressure from the tubing connection caused the mud bucket to become airborne, striking the employee's forehead.

The Division did not allege any violation based upon the mud-bucket's being uncovered; nor did the Division allege that the components of the mud bucket (handle, opening sides and latch)⁷ were not designed, secured or covered to minimize the hazards caused by breakage or release of mechanical energy. Nor were these issues litigated at the hearing. There was no evidence presented to demonstrate that a release of *mechanical* pressure was involved in the accident. The AVD states that the employer did not ensure that the mud bucket was properly secured to minimize the hazards associated *with a release of pressure from the tubing connection when it was broken*. Therefore, this is not the type of hazard contemplated by the safety order. The pressure in this instance was caused by gas and fluids that had been trapped by the clog or "fish" in the well⁸.

The remaining elements of the safety order deal with whether equipment components are designed and/or secured to minimize the hazards caused by loosening or falling. The issue of securing the mud bucket is discussed in Issue 6, below. With regard to the design of the mud bucket:

⁷ See Division's Exhibits I and J and Employer's Exhibit 1.

⁸ Gomez testified that the pipe is closed with a valve to prevent any spill and to prevent any *fluid or gas* coming up. Dorado testified that the pressure in the well was checked around 7:20 a.m. and the gage read "no pressure." Dorado explained that the pressure can change over the course of the day, but that workers should be able to hear it and smell the *gas*.

In several decisions, the Appeals Board has held that the Division bears an evidentiary burden of proving that a safety standard which is referred to in a citation applies to the specific factual circumstances in which a citation is issued. See, e.g. *Travenol Laboratories, Highland Division*, Cal/OSHA App. 76-1073, Decision After Reconsideration, (Oct. 16, 1980) and *Carris Reels of California*, Cal/OSHA App. 95-1456, Decision After Reconsideration, (Dec. 6, 2000). Where the Division's case presents a factual situation not within the contemplation of the cited safety order, the alleged violation must be set aside. (See also *Carver Construction Co.*, OSHAB 77-378, Decision After Reconsideration, (March 27, 1980), citing *Johnson Aluminum Foundry*, OSHAB 78-593, Decision After Reconsideration (Aug. 28, 1979).

In *Brunton Enterprises, Inc.*, Cal/OSHA App. 08-3445, Decision After Reconsideration (October 11, 2013), the Board considered the application of Section 3328(e) to an allegation that a dolly was not designed for "such a wide load." There the Board stated:

In regards to the allegation that the dolly was inadequately designed, the ALJ rejected this argument based on insufficient evidence to make a determination as to whether or not the dolly was designed for such a large load. (Decision at p. 14.) We agree with this finding.

Furthermore, we point out that even if we were to assume that Employer actually designed the dolly, and even if the Division proved, as it alleged, that the dolly was "not designed for such a wide and large load, the safety order would not apply in the first place. Section 3328(e) requires that "equipment components shall be designed... *to minimize hazards caused by breakage, release of mechanical energy (e.g., broken springs), or loosening or falling* ." (Section 3328(e) [emphasis added].) Therefore, a dolly that simply is "not designed for such a wide and large load" is not in violation of the safety order, as it would need to be shown that the dolly's components were not designed "to minimize hazards caused by breakage, released mechanical energy, or loosening or falling."

The facts in *Brunton*, supra, are similar to the facts in this case, in that the Division presented insufficient evidence to demonstrate that the mud bucket's components were inadequately designed "to minimize hazards caused by breakage, released mechanical energy, or loosening or falling." The Division presented little to no evidence regarding the design requirements of the mud bucket.

Issue 6: Do the securing requirements of Section 3328 apply to these facts?

In *Brunton*, supra, (a case interpreting Section 3328) the Board agreed that:

Regarding the allegation that the frame and dolly were not secured to minimize loosening and falling, the ALJ appropriately found that the safety order did not apply. (Decision, p. 14.) The ALJ noted, and we agree, that "nothing in the record shows that the frame's components or the dolly's components were not designed, secured or covered to minimize the risk of the components breaking, loosening or falling.

Likewise in our matter, nothing in the record demonstrated that the mud bucket's components were not secured to minimize the risk of the components' breaking, loosening or falling. The Division did not establish that the mud bucket was in place/in use on the tubing when the pressure release occurred.

Kinetic Systems, Inc. Cal/OSHA App. 06-3627, Decision After Reconsideration (April 8, 2010), upheld a violation of 3328(e) in a situation where an Employer failed to secure a metal box tube to a pipe chase and the box tube fell, striking an Employee. The box tube rested like a bridge over the rectangular opening of the pipe chase. Gussets or cleats on the box tube set down into the pipe chase's rectangular opening, and rested against both sides, but were not secured in any other fashion. The employer argued that the box tube could not have been "loosened" since it had never been "secured." There the Board stated that it "rejects any reading of the safety order that requires an item to be found to be 'secured' before it can be found to have 'loosened.'" In *Kinetic*, the box tube was in place on the pipe chase (presumably in the ordinary manner) and was in use. The Board reasoned: "items that are inadequately or not secured are more likely to become loose and fall."

Kinetic does not apply to our situation, because there was no evidence that the mud bucket was in place at the time of the accident. The Division did not produce any evidence to show that the mud bucket had been in place on the tubing and was in use at the time of the pressure release. None of the witnesses who testified saw whether Gomez had placed the mud bucket on the tubing prior to the loud "Boom!" that accompanied the pressure release which caused Gomez's injuries. Gomez, himself, did not remember whether he

had placed the mud bucket on the tubing prior to the pressure release.⁹ Whether the mud bucket would have been blown off by the pressure, or held in place by the latch, had it actually been attached to the pipe, is unknown. Therefore, *Kinetic Systems, Inc.* is distinguishable from this case.

The securing requirements of Section 3328(e) do not apply to the facts of this situation as there was no evidence that the mud bucket was in place on the tubing at the time of the accident.

Therefore Employer's appeal of Citation 3 is granted. Citation 3 must be dismissed.

Issue 7: Were the penalties proposed for each alleged violation reasonable?

The Division enjoys a rebuttable presumption that its proposed penalties are reasonable once it established that they were calculated in accordance with the Division's policies, procedures and regulations (*Stockton Tri Industries, Inc.*, Cal/OSHA App. 02-4946, Decision After Reconsideration (Mar. 27, 2006).) The parties stipulated that the penalties were calculated in accordance with the Division's policies and procedures. Employer did not present any evidence to rebut the presumption. Therefore, the proposed penalties for Citations 1 and 2 are found reasonable. As the Division did not sustain a violation of section 3328(e), the proposed penalty is vacated for Citation 3.

Conclusion

Citation 1 is upheld with regard to the December 10, 2012 entry on Employer's Form 300 for 2012, Citation 2 is upheld with regard to instance 2 and Citation 3 is dismissed.

Order

Total penalties of \$1,200 are assessed for the reasons described herein, and as set forth in the attached Summary Table.

Dated: October 8, 2014

SANDRA L. HITT
Administrative Law Judge

SLH:ml

⁹ The mud bucket is attached to the tubing by pushing it onto the tubing and pushing a rod down to lock it into place.

APPENDIX A
SUMMARY OF EVIDENTIARY RECORD
Key Energy Services, LLC
Dockets 13-R4D3-2239 through 2242
Date of Hearing: December 11, 2013

Division Exhibits – Admitted

Exhibit Letter	Exhibit Description
A	Jurisdictional Documents
B	Form 36 (subject to hearsay objection)
C	Panoramic view of rig 449 (photograph)
D	Photograph of rig 449 floor
E	Close up view of tubing (photograph)
F	Photograph of wet box in tree
G	Photograph of mud-bucket (wet box) lying down
H	Photograph of mud-bucket standing up
I	Photograph of undamaged mud-bucket (closed)
J	Photograph of undamaged mud-bucket (open)
K	Document Request
L	Employer's 300 logs (4pp)
M	Key correspondence 1/2/13 (2 pp)
N	Key Pull Tubing Wet document (2 pp)
O	Key Employee training records (9 pp)
P	1BY form (6 pp)

Employer Exhibits Admitted

Exhibit Number	Exhibit Description
1	Wet box exemplar
2	Tube stand exemplar
7	Employer's IIPP
8	PPE Policy
9	PPE (hazard) assessment
10A	Photograph of hard hat
10B	Photograph of face shield
11	Photograph of rig floor
12	JSA for 12/10/12 (4 pp)
13	12/10/12 Work Plan

Witnesses Testifying at Hearing

1. Stacy Christian
2. Terry Hammer
3. David Etzler
4. Richard Salazar
5. Norberto Gomez
6. Frank Dorado
7. Edward Hernandez

CERTIFICATION OF RECORDING

I, Sandra L. Hitt, the California Occupational Safety and Health Appeals Board Administrative Law Judge duly assigned to hear the above matter, hereby certify the proceedings therein were electronically recorded. The recording was monitored by the undersigned and constitutes the official record of said proceedings. To the best of my knowledge, the electronic recording equipment was functioning normally.

SANDRA L. HITT

October 8, 2014

**SUMMARY TABLE
DECISION**

In the Matter of the Appeal of:
Key Energy Service, LLC
Dockets 13-R4D3-2239 through 2242

Abbreviation Key: Reg=Regulatory	
G=General	W=Willful
S=Serious	R=Repeat
ER=Employer	DOSH=Division

IMIS No. 316668623

DOCKET	CITATION	SECTION	TYPE	MODIFICATION OR WITHDRAWAL	AVFCIRTED	PENALTY PROPOSED BY DOSH IN CITATION	PENALTY PROPOSED BY DOSH AT HEARING	FINAL PENALTY ASSESSED BY BOARD
13-R4D3-2239	1	14300.29(a)	Reg	ALJ affirmed citation with regard to the 2012 Form 300 only.	X	\$450	\$450	\$450
13-R4D3-2240	2		S	DOSH reduced class from Serious to General. ALJ affirmed citation 2 with regard to instance 2, only.	X	750	750	750
13-R4D3-2241	3	3328(e)	S	ALJ dismissed citation.	X	\$8,100	0	0
13-R4D3-2242	4	6646(d)	S	Division w/d citation.	X	\$18,000	0	0
Sub-Total						\$27,300	1,200	\$1,200
Total Amount Due*								\$1,200

(INCLUDES APPEALED CITATIONS ONLY)

<p>NOTE: <i>Please do not send payments to the Appeals Board.</i></p> <p>All penalty payments must be made to: Accounting Office (OSH) Department of Industrial Relations P.O. Box 420603 San Francisco, CA 94142</p>
--

*You will owe more than this amount if you did not appeal one or more citations or items containing penalties. Please call (415) 703-4291 or (415) 703-4308 (payment plans) if you have any questions.

ALJ: SLH/ml
POS: 10/08/2014