

May 4, 2016

Ken Montgomery
Area Director
U.S. Occupational Safety and Health Administration
36 Triangle Park Drive
Cincinnati, Ohio 45246

SENT VIA U.S. MAIL AND BY FAX TO 513-841-4114

Dear Mr. Montgomery:

As workers at Fuyao Glass, we are extremely concerned about the safety of our workplace. We have heard about the two citations that OSHA has proposed, and many of us have seen OSHA investigators around the plant. While the two citations announced in late April are a step in the right direction, they are only the tip of the iceberg. Many workers have already been injured, and everywhere you look you can see a place where another one of us could get hurt or even killed. **Please consider this letter a formal complaint and request that OSHA continue and expand its investigation into health and safety problems at Fuyao Glass.**

Below is a list of specific safety concerns that we believe need to be investigated throughout the plant. Each of the support posts in our plant has a number (such as "A-1"). Wherever possible, we have used these post numbers to specify the location of a specific hazard. There are two sides to the plant. One, known as "OEM," makes glass that goes directly to automakers for the production of new vehicles. The other, Automotive Replacement Glass ("ARG") makes windows for aftermarket use. Both sides of the plant, though, do the same type of work, and have similar departments. This is important because if you find a violation in a department on the ARG side, that same violation is likely happening on the OEM side as well. We have done our best to document as many concerns as possible, but we know we have not captured them all. **The only way to make sure this plant is safe is for OSHA to conduct a wall-to-wall investigation.**

Cuts

- in the Lamination areas, workers use extremely sharp knives to trim excess PVB from windows before they have been laminated. Workers routinely get cuts serious enough that they require stitches. We know of at least six workers in the past month or so who have been seriously cut. Workers in the lamination areas have asked for cut-resistant gloves to protect our hands, but management says that we cannot have them because they leave residue on the glass. When workers do get cut, we do not have kits to clean up the blood and protect us from any bloodborne pathogens, or even a clear way to contact a manager to report the injury.
- There are the same sorts of problems in the Tempering areas of the plant, too.

Lack of Machine Guards and Lockout-Tagout Procedures

- In the both the ARG and OEM lamination areas, there are large tanks where pieces of glass are washed. Sometimes, glass breaks while in these tanks, and it needs to be cleaned out. To do this, the company makes workers climb through a hatch into the empty tanks to pick up the broken glass. There is no way to protect workers while they

- are inside the tank. They could become trapped inside, and the tank could refill with water or the conveyor can move while they are still doing the maintenance work.
- In general, there are not proper lockout and tagout procedures throughout the plant. For example, management has told maintenance workers that they cannot shut down the bending furnaces in ARG during maintenance because it takes so long for them to reheat. Workers are told that the procedure for "shutting down" the bending furnaces during maintenance work is to turn the key on the control console and put it in your pocket. There are two problems with this. First, the console still allows you to control the furnace manually, including making changes that would put workers in grave danger. Second, the keys used in the bending furnaces are the same ones that are used for other machines in the plant. The keys can be interchanged, leading to the furnace being turned on when a worker is still conducting maintenance.
- On April 28, a worker got her shirt caught in a conveyor belt that was missing its safety guards at Post E-44, risking serious injury. Fortunately, several workers were able to rush to her rescue before she was hurt. Many of the conveyor belts in the plant lack these same guards.
- At Post AJ-57, there is a machine that uses suction to pick up and move pieces of glass. If that machine happens to lose suction, the glass could go flying across the room, shattering and possibly injuring many workers. There are not proper guards to prevent that glass from flying if the machine malfunctions.
- There is no robot safety interlock at Posts AN-35, AM-34, and AC-36.
- There is also a machine at Post B-50 that does not have a proper guard, which could crush somebody.

Fire Safety

- We are all very concerned about what would happen in the event of a fire.
- While some workers have been shown copies of an evacuation plan, not everyone has. In many cases, the plans are not posted in places where they are easy to find, if they are posted at all.
- Even if people have seen the evacuation plans, we have never done an evacuation drill. Since the plant is changing all the time, with new lines and equipment being added, we have no idea if the evacuation plans even work, or if our escape paths might be blocked or so crowded that it is impossible to exit the plant safely.
- There are several locations in the plant where exit signs are incorrect or misleading, or that exits are blocked. For example, at Post AE-40, workers are pointed to an exit, but if you follow that exit sign it leads you straight into a fence with no gate—there is no way out. The exit is surrounded by piles of materials that further obstruct the exit.
- Some of us work in smaller enclosed with only one possible exit. If that exit happens to be blocked by, for example, a fire, we would be trapped. This is true, for example, in the lamination area in ARG, and by the Tempering Furnaces on the OEM side. This is also true in the ARG Print Room.
- In many parts of the plant, fire extinguishers have not been installed.
- In some parts of the plant, the fire alarm is difficult or impossible to hear, and the directions given over the speaker are garbled and difficult to understand. Some of us work in spaces where the visual alarm is not visible.

Electrical Safety

- There are power lines in the way of moving equipment, including a 7½ ton crane. It would be easy for the crane to hit these wires, causing a major electrical safety hazard. (Post G-36)
- Workers in the Automotive Replacement Glass (ARG) department work in standing water, even though there are electrical wires and pedal switches on the floor. Some of this water is a result of the production process. But there are other causes, too. Some of us have seen water coming up out of drains in the floor when it rains. And on April 27, one of us noticed that Fuyao management had cut a drain pipe that came from the men's restrooms (Post N-48). Rather than capping that pipe, sewage trickled out onto the plant floor. The pipe has been stuffed with bubble wrap instead of being sealed off properly.
- In numerous spots in the plant, including the Tempering Assembly area on the OEM side, the company uses long extension cords rather than hard-wiring lights and other things.
- There are not proper GFI outlets near the washers at Post AA-41 and AB-41.
- The electrical panel is blocked at Post AH-36.

Silica

- In the glass cutting and grinding area, there are supposed to be filter bags that collect the dust that is generated. Those bags do not seem to be functioning properly, and the dust is collecting on the floor, where it gets in the air and workers can breathe it in. As you know, OSHA has revised its rules on silica dust to provide workers with more protection. If we breathe silica into our lungs, it can create serious, long-term health hazards.
- There is a substance used in the plant called Celatom. This product, which contains silica, is used to keep sheets of glass from sticking to each other as they go through the production process. It is used in many areas of the plant. One specific area of concern is Post AG-52, where the powder pump is located. This machine is used to coat the sheets of glass with Celatom. There is a large amount of silica present in the air, which is a hazard to workers in that particular area, who do not have appropriate respiratory protection to prevent them from breathing the dust.

Forklifts and Golf Carts

1. As the plant adds more lines and becomes more congested, traffic is becoming a larger and larger safety hazard. Forklifts, golf carts (used by contractors, supervisors, logistics, IT, and others in the plant), and people share the same aisles. There is no separate pedestrian walk space.
2. Forklifts and golf carts frequently exceed the posted speed limit of 5 mph. The golf carts don't have horns to warn you if they are coming.
3. In many parts of the plant, there are no mirrors at intersections where there are blind spots, making the potential for an accident even greater.
4. There are certain spots that are especially dangerous. One place is by the time clocks. There are also dangerous areas in the OEM-Tempering Assembly department around Posts AB-36, AH-37, and J-34.

Fall Hazards

- There are still places in the plant where there are holes or pits that do not have appropriate guards. For example, at Post AG-56, there is a hole at the bottom of a staircase that is partially covered with a piece of plywood labeled "Hole." There is no fall protection around any of the recessed washers. In addition, there are unguarded trenches and fall hazards at Posts AE36 and AG-56, in the OEM-EPBL 1 & 2 Department after the furnace, near the GBF Washer and by the two assembly lines.
- The treads on the top step of the stairs does not meet the OSHA standard at Posts AH-35, AG-35, AL-35, and AL-36.
- The fact that the plant is under constant construction, as Fuyao adds new lines and makes other repairs and changes, creates a number of safety hazards because it does not appear that many of the contractors are using proper safety procedures. For example, there are often contractors working overhead without a harness. Sometimes these contractors are working directly above one of our work stations. This creates safety hazards not just for them but for us, too. If something (or someone) falls from above us, we may be injured as well.
- Boxes are stacked more than three high at several locations (for example, Posts AH-34 and D-32. Workers cannot see over the boxes, which can create a blind spot where accidents can happen, and forklifts that try to handle the boxes will tip when trying to load or unload.

We would like to speak to an OSHA investigator to give more detail about these issues. In order to coordinate these interviews, you can contact LaTonya Coleman at 313-685-2987. We look forward to your prompt response.

Sincerely,

Signature: Rhonda Rowland-Monk

Printed Name: Rhonda Rowland-Monk

Signature: Eric Steven Petrosino

Printed Name: Eric Steven Petrosino

Signature: Brandee Mercedes Deboise

Printed Name: Brandee Mercedes Deboise

Signature: Tim Jernigan

Printed Name: TIM JERNIGAN

Signature: Cynthia Harper

Printed Name: Cynthia Harper

Signature: [Signature]

Printed Name: Nicholas Tannenbaum

Signature: [Signature]

Printed Name: Jenny Grant

Signature: [Signature]

Printed Name: Michael Hecht

Signature: [Signature]

Printed Name: Jeff Morwick

Signature: [Signature]

Printed Name: Robert Cordova

Signature: [Signature]

Printed Name: Bruce Halpern

Signature: _____

Printed Name: _____

Signature: _____

Printed Name: _____

Signature: _____

Printed Name: _____