

U.S. Department of Labor
Occupational Safety and Health Administration
1222 Spruce Street
Room 9.104
Saint Louis, MO 63103
Phone: 314-425-4249 Fax: 314-425-4289



Citation and Notification of Penalty

To:
GLOBAL PYROTECHNIC SOLUTIONS, INC.
10476 SUNSET DRIVE
Dittmer, MO 63023

Inspection Number: 279658
Inspection Date(s): 03/06/2012 - 09/04/2012
Issuance Date: 09/04/2012
Reply to Strategic Team

Inspection Site:
10476 SUNSET DRIVE
Dittmer, MO 63023

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 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. 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.

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



NOTICE TO EMPLOYEES OF INFORMAL CONFERENCE

An informal conference has been scheduled with OSHA to discuss the citation(s) issued on 09/04/2012. The conference will be held at the OSHA office located at 1222 Spruce Street, Room 9.104, Saint Louis, MO 63103 on _____ at _____.

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

CERTIFICATION OF CORRECTIVE ACTION WORKSHEET

Inspection Number: 279658

Company Name: GLOBAL PYROTECHNIC SOLUTIONS, INC.
Inspection Site: 10476 SUNSET DRIVE, Dittmer, MO 63023
Issuance Date: 09/04/2012

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, 1222 Spruce Street, Room 9.104, Saint Louis, MO 63103**

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: GLOBAL PYROTECHNIC SOLUTIONS, INC.
Inspection Site: 10476 SUNSET DRIVE, Dittmer, MO 63023

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

29 CFR 1910.106(d)(4)(i): Inside storage rooms were not constructed to meet the required fire-resistive rating for their use. Such construction did not comply with the test specifications set forth in Standard Methods of Fire Tests of Building Construction and Materials, NFPA 251-1969. Openings to other rooms or buildings were not provided with noncombustible liquid-tight raised sills or ramps at least 4 inches in height, or the floor in the storage area was not at least 4 inches below the surrounding floor. Openings were not provided with approved self-closing fire doors.

At the time of the inspection, chemical storage room #6 used to store flammables was not equipped with an approved self closing door or provided with liquid-tight raised sills.

Abatement certification and abatement documentation is required for this violation. The documentation should include written verification of abatement, applicable measurements or monitoring results, and photographs or videos which you believe will be helpful. The abatement certification sheet is enclosed with the citations.

ABATEMENT DOCUMENTATION REQUIRED FOR THIS ITEM

Date By Which Violation Must be Abated:	12/03/2012
Proposed Penalty:	\$3500.00



Citation and Notification of Penalty

Company Name: GLOBAL PYROTECHNIC SOLUTIONS, INC.
Inspection Site: 10476 SUNSET DRIVE, Dittmer, MO 63023

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

29 CFR 1910.106(d)(4)(iv): Inside storage room was not be provided with either a gravity or a mechanical exhaust ventilation system. Such system shall be designed to provide for a complete change of air within the room at least six times per hour.

At the time of the inspection, chemical storage room #6 was used to store and dispense flammables and was not provided with a ventilation system to provide a complete air change 6 times per hour as required.

Abatement certification and abatement documentation is required for this violation. The documentation should include written verification of abatement, applicable measurements or monitoring results, and photographs or videos which you believe will be helpful. The abatement certification sheet is enclosed with the citations.

ABATEMENT DOCUMENTATION REQUIRED FOR THIS ITEM

Date By Which Violation Must be Abated:	12/03/2012
Proposed Penalty:	\$3500.00



Citation and Notification of Penalty

Company Name: GLOBAL PYROTECHNIC SOLUTIONS, INC.

Inspection Site: 10476 SUNSET DRIVE, Dittmer, MO 63023

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

29 CFR 1910.109(b)(1): Explosives or blasting agents were stored, handled, and/or transported when such storage, handling, and transporting of such explosives or blasting agents constituted an undue hazard to life:

At the time of the inspection, the employer violated this section of the standard by exposing all workers to explosion hazards and did not comply with consensus standard NFPA 1124 the following sections;

- a) 4.3.1.1 Manufacturers shall maintain records in compliance with federal regulations. The employer had no records of inspections of equipment such as the bonding and grounding tests for mechanical equipment.
- b) 4.5.1.2 Wall joints and openings for wiring, plumbing, and other utilities shall be sealed to prevent the entry of dusts. The inspection found openings in process buildings that could allow entry of dust.
- c) 4.5.3.4.2 All presses and other such mechanical devices used in the vicinity of exposed explosive or pyrotechnic composition shall be electrically bonded and grounded. The inspection found no record that mechanical equipment such as the Stokes press was electrically bonded and grounded.
- d) 4.12.1.1 All buildings shall be kept clean and orderly, and dust and rubbish shall be kept to a minimum. The inspection found accumulations of trash inside process buildings.
- e) 4.12.1.5 Rags, combustible scrap and paper shall be kept in approved, marked containers until removed from the building. The inspection found accumulations of trash inside of process buildings.
- f) 4.12.4.1 Personnel working at or supervising mixing, pressing, and loading operations shall be provided with and shall wear cotton or other similarly protective clothing. The inspection found multiple instances where employees were wearing clothing that was not 100% cotton.
- g) 4.13.2.2 An emergency warning signal shall be established. The inspection found that no emergency warning signal was in place.

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: GLOBAL PYROTECHNIC SOLUTIONS, INC.
Inspection Site: 10476 SUNSET DRIVE, Dittmer, MO 63023

- h) 4.15.1 The number of occupants in each process building and in each magazine shall not exceed the number necessary to conduct production operations. The inspection found that the number of employees needed in process buildings exceeded the number necessary to conduct operations at the time of the composition flash.
- i) 4.15.2 The maximum number of occupants and maximum weight of pyrotechnic and explosive composition permitted in each process building and in each magazine shall be posted in a conspicuous location in each process building or magazine. The inspection did not find occupancy or weight limits posted in process buildings.
- j) 5.3.1 The following shall not be permitted inside of or within 50 ft (15 m) of a magazine: (4) Spark-producing devices. The inspection found multiple instances on spark producing tools inside process buildings.
- k) 5.7.10 Tools and equipment shall be made of or covered with non-spark producing materials. The tools found inside process buildings were not made of non-spark producing materials.
- l) 6.8.3.3 Exit doors shall be equipped with panic hardware. The inspection found that some process building doors were not equipped with panic hardware.
- m) 6.11.6 Signs that read as follows in letters not less than 4 in. (102 mm) high on a contrasting background shall be conspicuously posted on the outside of any consumer fireworks storage building: FIREWORKS NO SMOKING The inspection found that process buildings were not posted with proper no smoking signs.

Abatement certification and abatement documentation is required for this violation. The documentation should include written verification of abatement, applicable measurements or monitoring results, and photographs or videos which you believe will be helpful. The abatement certification sheet is enclosed with the citations.

ABATEMENT DOCUMENTATION REQUIRED FOR THIS ITEM

Date By Which Violation Must be Abated: 09/19/2012
Proposed Penalty: \$4900.00

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

Inspection Number: 279658
Inspection Date(s): 03/06/2012 - 09/04/2012
Issuance Date: 09/04/2012



Citation and Notification of Penalty

Company Name: GLOBAL PYROTECHNIC SOLUTIONS, INC.
Inspection Site: 10476 SUNSET DRIVE, Dittmer, MO 63023

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 1910.119(d)(3)(i)(E): The employer did not compile information pertaining to the equipment in the process.

At the time of the inspection, there was no process safety information concerning the technology of ventilation systems in areas where explosives were handled. The employer had no information for the ventilation systems installed in process buildings, mix bay, dryers, tumbler room, chemical storage room or press rooms.

Abatement certification and abatement documentation is required for this violation. The documentation should include written verification of abatement, applicable measurements or monitoring results, and photographs or videos which you believe will be helpful. The abatement certification sheet is enclosed with the citations.

ABATEMENT DOCUMENTATION REQUIRED FOR THIS ITEM

Date By Which Violation Must be Abated:	09/19/2012
Proposed Penalty:	\$4900.00

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Citation and Notification of Penalty

Company Name: GLOBAL PYROTECHNIC SOLUTIONS, INC.
Inspection Site: 10476 SUNSET DRIVE, Dittmer, MO 63023

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

29 CFR 1910.119(d)(3)(i)(F): Information pertaining to the equipment in the process did not include design codes and standards employed;

At the time of the inspection, the employer did not document the codes or standards it employs for safety interlocks or safety shutdown systems. The Press 1 Building was equipped with a safety shutdown switch, connected the Stokes press. This shutdown switch was installed and used at the time of the incident. The employer could not identify the design code used, nor supply a reference to standards employed.

Abatement certification and abatement documentation is required for this violation. The documentation should include written verification of abatement, applicable measurements or monitoring results, and photographs or videos which you believe will be helpful. The abatement certification sheet is enclosed with the citations.

ABATEMENT DOCUMENTATION REQUIRED FOR THIS ITEM

Date By Which Violation Must be Abated:

09/19/2012

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

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Company Name: GLOBAL PYROTECHNIC SOLUTIONS, INC.
Inspection Site: 10476 SUNSET DRIVE, Dittmer, MO 63023

Citation 1 Item 5 Type of Violation: **Serious**

29 CFR 1910.119(d)(3)(ii): The employer did not document that equipment complies with recognized and generally accepted good engineering practices.(RAGAGEP)

At the time of the inspection, the employer had not documented compliance with RAGAGEP for any process equipment including presses and ventilation systems.

Abatement certification and abatement documentation is required for this violation. The documentation should include written verification of abatement, applicable measurements or monitoring results, and photographs or videos which you believe will be helpful. The abatement certification sheet is enclosed with the citations.

ABATEMENT DOCUMENTATION REQUIRED FOR THIS ITEM

Date By Which Violation Must be Abated:	09/19/2012
Proposed Penalty:	\$4900.00

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: GLOBAL PYROTECHNIC SOLUTIONS, INC.
Inspection Site: 10476 SUNSET DRIVE, Dittmer, MO 63023

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 6 a Type of Violation: **Serious**

29 CFR 1910.119(e)(3)(i): The Process Hazard Analysis(PHA) did not address the hazards of the process;

At the time of the inspection, the following hazards had not been covered by the PHA; explosion, fire, accidental ignition, chemical exposures, humidity, wind, lightning, ignition sources, and the mixing of incompatible materials. The PHA "checklist" did not have any questions to evaluate these hazards.

Abatement certification and abatement documentation is required for this violation. The documentation should include written verification of abatement, applicable measurements or monitoring results, and photographs or videos which you believe will be helpful. The abatement certification sheet is enclosed with the citations.

ABATEMENT DOCUMENTATION REQUIRED FOR THIS ITEM

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Citation and Notification of Penalty

Company Name: GLOBAL PYROTECHNIC SOLUTIONS, INC.
Inspection Site: 10476 SUNSET DRIVE, Dittmer, MO 63023

Citation 1 Item 6 b Type of Violation: **Serious**

29 CFR 1910.119(e)(3)(iii): The Process Hazard Analysis(PHA) did not address engineering and administrative controls applicable to the hazards.

At the time of the inspection, the PHA for the covered process of manufacturing incendiary pellets did not address engineering controls that were implemented. The Press 1 Building PHA, Dated 4/1/2010 (Doc-4), did not address that the employer has installed grounding rods, pads and cables throughout Press 1 Building. Items including, but not limited to, functional testing of grounding rods, functional testing of grounding cables and pads, and ensuring components are properly grounded were not reviewed.

Abatement certification and abatement documentation is required for this violation. The documentation should include written verification of abatement, applicable measurements or monitoring results, and photographs or videos which you believe will be helpful. The abatement certification sheet is enclosed with the citations.

ABATEMENT DOCUMENTATION REQUIRED FOR THIS ITEM

Date By Which Violation Must be Abated:

09/19/2012

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: GLOBAL PYROTECHNIC SOLUTIONS, INC.
Inspection Site: 10476 SUNSET DRIVE, Dittmer, MO 63023

Citation 1 Item 6 c Type of Violation: **Serious**

29 CFR 1910.119(e)(3)(iv): The Process Hazard Analysis(PHA) did not address the consequences of failure of engineering and administrative controls;

At the time of the inspection, the employer PHAs did not address the failure of engineering and/or administrative controls. In the press room, work buildings #5A,B,C, and D, Mix Bay, and dryers engineering and administrative controls were used to control hazards but no review was made in the related PHAs.

Abatement certification and abatement documentation is required for this violation. The documentation should include written verification of abatement, applicable measurements or monitoring results, and photographs or videos which you believe will be helpful. The abatement certification sheet is enclosed with the citations.

ABATEMENT DOCUMENTATION REQUIRED FOR THIS ITEM

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Citation and Notification of Penalty

Company Name: GLOBAL PYROTECHNIC SOLUTIONS, INC.
Inspection Site: 10476 SUNSET DRIVE, Dittmer, MO 63023

Citation 1 Item 6 d Type of Violation: **Serious**

29 CFR 1910.119(e)(3)(v): The Process Hazard Analysis PHA did not address facility siting;

At the time of the inspection, the PHA did not fully address facility siting including, but not limited to, the assessment of distances from onsite roadways, vehicle traffic up to work buildings, vehicles parking too close to a work building, vehicles potentially hitting a work building, and the introduction of potential ignition sources (lawn mower, weed trimmer, snow plow, chainsaws, tractors).

Abatement certification and abatement documentation is required for this violation. The documentation should include written verification of abatement, applicable measurements or monitoring results, and photographs or videos which you believe will be helpful. The abatement certification sheet is enclosed with the citations.

ABATEMENT DOCUMENTATION REQUIRED FOR THIS ITEM

Date By Which Violation Must be Abated:

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Citation and Notification of Penalty

Company Name: GLOBAL PYROTECHNIC SOLUTIONS, INC.
Inspection Site: 10476 SUNSET DRIVE, Dittmer, MO 63023

Citation 1 Item 6 e Type of Violation: **Serious**

29 CFR 1910.119(e)(3)(vi): The Process Hazard Analysis(PHA) did not address human factors;

At the time of the inspection, the employer conducted PHAs for covered processes but did not include a review of hazards of human factors. The PHA "checklist" did not have any questions to evaluate human factor hazards.

Abatement certification and abatement documentation is required for this violation. The documentation should include written verification of abatement, applicable measurements or monitoring results, and photographs or videos which you believe will be helpful. The abatement certification sheet is enclosed with the citations.

ABATEMENT DOCUMENTATION REQUIRED FOR THIS ITEM

Date By Which Violation Must be Abated:

09/19/2012

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: GLOBAL PYROTECHNIC SOLUTIONS, INC.
Inspection Site: 10476 SUNSET DRIVE, Dittmer, MO 63023

Citation 1 Item 6 f Type of Violation: **Serious**

29 CFR 1910.119(e)(3)(vii): The Process Hazard Analysis(PHA) did not address qualitative evaluation of a range of the possible safety and health effects of failure of controls on employees in the workplace.

At the time of the inspection, the PHA did not fully address and include an evaluation of a range of the possible safety and health effects of failure of controls on employees in the workplace including, but not limited to, exposure to energetic materials in powdered form, chemical exposures, AM/FM radios being present inside or near classified areas, and not following written procedures.

Abatement certification and abatement documentation is required for this violation. The documentation should include written verification of abatement, applicable measurements or monitoring results, and photographs or videos which you believe will be helpful. The abatement certification sheet is enclosed with the citations.

ABATEMENT DOCUMENTATION REQUIRED FOR THIS ITEM

Date By Which Violation Must be Abated:

09/19/2012



Citation and Notification of Penalty

Company Name: GLOBAL PYROTECHNIC SOLUTIONS, INC.
Inspection Site: 10476 SUNSET DRIVE, Dittmer, MO 63023

Citation 1 Item 6 g Type of Violation: **Serious**

29 CFR 1910.119(e)(4): The Process Hazard Analysis(PHA) was not performed by a team with expertise in engineering and process operations, and the team did not include at least one employee who has experience and knowledge specific to the process being evaluated. Also, one member of the team was not knowledgeable in the specific process hazard analysis methodology being used.

At the time of the inspection, the Work Building #5-D PHA, Dated 4/1/2010 (Doc-4), was completed by a single individual and not a team with expertise in engineering and process operations. As noted on the summary heading, Hazard Analysis Team Members provides a single signature. A printed signature of the Safety Director exists on the form but is not identified as being part of the PHA team.

Abatement certification and abatement documentation is required for this violation. The documentation should include written verification of abatement, applicable measurements or monitoring results, and photographs or videos which you believe will be helpful. The abatement certification sheet is enclosed with the citations.

ABATEMENT DOCUMENTATION REQUIRED FOR THIS ITEM

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Company Name: GLOBAL PYROTECHNIC SOLUTIONS, INC.
Inspection Site: 10476 SUNSET DRIVE, Dittmer, MO 63023

Citation 1 Item 7 Type of Violation: **Serious**

29 CFR 1910.119(f)(1): The employer did not develop and implement written operating procedures that provide clear instructions for safely conducting activities involved in each covered process consistent with the process safety information during normal operation.

At the time of the inspection, the normal operation procedures did not address the operation of the ventilation system in press buildings, mix bay, dryers, and work buildings.

Abatement certification and abatement documentation is required for this violation. The documentation should include written verification of abatement, applicable measurements or monitoring results, and photographs or videos which you believe will be helpful. The abatement certification sheet is enclosed with the citations.

ABATEMENT DOCUMENTATION REQUIRED FOR THIS ITEM

Date By Which Violation Must be Abated:	09/19/2012
Proposed Penalty:	\$4900.00

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

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Company Name: GLOBAL PYROTECHNIC SOLUTIONS, INC.
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Citation 1 Item 8 Type of Violation: **Serious**

29 CFR 1910.119(f)(1)(i): The employer did not develop and implement written operating procedures for emergency shutdown and operation;

At the time of the inspection, the employee had not included emergency shutdown and emergency operations requirements in the operating procedures for processes covered under process safety management.

Abatement certification and abatement documentation is required for this violation. The documentation should include written verification of abatement, applicable measurements or monitoring results, and photographs or videos which you believe will be helpful. The abatement certification sheet is enclosed with the citations.

ABATEMENT DOCUMENTATION REQUIRED FOR THIS ITEM

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Company Name: GLOBAL PYROTECHNIC SOLUTIONS, INC.
Inspection Site: 10476 SUNSET DRIVE, Dittmer, MO 63023

Citation 1 Item 9 Type of Violation: **Serious**

29 CFR 1910.119(f)(1)(iii): The employer did not develop and implement written operating procedures for covered processes including hazards associated with hazardous chemicals:

At the time of the inspection, the employer did not fully identify safety and health considerations in the operating procedures for processes including the mixing of composite for the incendiary pellets.

Abatement certification and abatement documentation is required for this violation. The documentation should include written verification of abatement, applicable measurements or monitoring results, and photographs or videos which you believe will be helpful. The abatement certification sheet is enclosed with the citations.

ABATEMENT DOCUMENTATION REQUIRED FOR THIS ITEM

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Company Name: GLOBAL PYROTECHNIC SOLUTIONS, INC.

Inspection Site: 10476 SUNSET DRIVE, Dittmer, MO 63023

Citation 1 Item 10 Type of Violation: **Serious**

29 CFR 1910.119(f)(2): Operating procedures were not readily accessible to employees who work in or maintain a process.

At the time of the inspection, employees working in the incendiary pellet production in Press room #1 were not given written operating procedures for that process.

Abatement certification and abatement documentation is required for this violation. The documentation should include written verification of abatement, applicable measurements or monitoring results, and photographs or videos which you believe will be helpful. The abatement certification sheet is enclosed with the citations.

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Company Name: GLOBAL PYROTECHNIC SOLUTIONS, INC.
Inspection Site: 10476 SUNSET DRIVE, Dittmer, MO 63023

Citation 1 Item 11 Type of Violation: **Serious**

29 CFR 1910.119(f)(3): The operating procedures were not reviewed as often as necessary to assure that they reflect current operating practice, including changes that result from changes in process chemicals, technology, and equipment, and changes to facilities. The employer shall certify annually that these operating procedures are current and accurate.

At the time of the inspection, the employer did not review as necessary and certify annually that all operating procedures for PSM covered processes were current and accurate.

Abatement certification and abatement documentation is required for this violation. The documentation should include written verification of abatement, applicable measurements or monitoring results, and photographs or videos which you believe will be helpful. The abatement certification sheet is enclosed with the citations.

ABATEMENT DOCUMENTATION REQUIRED FOR THIS ITEM

Date By Which Violation Must be Abated:	09/19/2012
Proposed Penalty:	\$4900.00

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

Inspection Number: 279658
Inspection Date(s): 03/06/2012 - 09/04/2012
Issuance Date: 09/04/2012



Citation and Notification of Penalty

Company Name: GLOBAL PYROTECHNIC SOLUTIONS, INC.

Inspection Site: 10476 SUNSET DRIVE, Dittmer, MO 63023

Citation 1 Item 12 Type of Violation: **Serious**

29 CFR 1910.119(h)(2)(i): The employer, when selecting a contractor, did not obtain and evaluate information regarding the contract employer's safety performance and programs.

At the time of the inspection, the employer had not reviewed safety, performance and program records for contractors working on or near PSM covered processes.

Abatement certification and abatement documentation is required for this violation. The documentation should include written verification of abatement, applicable measurements or monitoring results, and photographs or videos which you believe will be helpful. The abatement certification sheet is enclosed with the citations.

ABATEMENT DOCUMENTATION REQUIRED FOR THIS ITEM

Date By Which Violation Must be Abated:

09/19/2012

Proposed Penalty:

\$4900.00

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: 279658
Inspection Date(s): 03/06/2012 - 09/04/2012
Issuance Date: 09/04/2012



Citation and Notification of Penalty

Company Name: GLOBAL PYROTECHNIC SOLUTIONS, INC.
Inspection Site: 10476 SUNSET DRIVE, Dittmer, MO 63023

Citation 1 Item 13 Type of Violation: **Serious**

29 CFR 1910.119(i)(1): The employer did not perform a pre-startup safety review(PSSR) for new facilities and for modified facilities when the modification is significant enough to require a change in the process safety information.

At the time of the inspection, it was found that the employer had not conducted a PSSR for the new process of producing incendiary pellets in Press Room 1B.

Abatement certification and abatement documentation is required for this violation. The documentation should include written verification of abatement, applicable measurements or monitoring results, and photographs or videos which you believe will be helpful. The abatement certification sheet is enclosed with the citations.

ABATEMENT DOCUMENTATION REQUIRED FOR THIS ITEM

Date By Which Violation Must be Abated:	09/19/2012
Proposed Penalty:	\$4900.00

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: GLOBAL PYROTECHNIC SOLUTIONS, INC.
Inspection Site: 10476 SUNSET DRIVE, Dittmer, MO 63023

Citation 1 Item 14 Type of Violation: **Serious**

29 CFR 1910.119(l)(2): Management of change(MOC) procedures did not assure that the following considerations were addressed prior to any change; the impact on safety and health, and modifications to operating procedures.

At the time of the inspection at least two pieces of equipment had been added or modified but without the use of an MOC. The Stokes Tablet press was modified for continuous operation and the LG window air conditioner was installed in the Press Room #1 without addressing safety and health hazards.

Abatement certification and abatement documentation is required for this violation. The documentation should include written verification of abatement, applicable measurements or monitoring results, and photographs or videos which you believe will be helpful. The abatement certification sheet is enclosed with the citations.

ABATEMENT DOCUMENTATION REQUIRED FOR THIS ITEM

Date By Which Violation Must be Abated:	09/19/2012
Proposed Penalty:	\$4900.00



Citation and Notification of Penalty

Company Name: GLOBAL PYROTECHNIC SOLUTIONS, INC.
Inspection Site: 10476 SUNSET DRIVE, Dittmer, MO 63023

Citation 1 Item 15 Type of Violation: **Serious**

29 CFR 1910.119(j)(2): The employer did not establish or implement written procedures to maintain the on-going integrity of process equipment:

At the time of the inspection, the employer had not established or implemented procedures to maintain process equipment used in the production of fireworks and incendiary pellets. There are no written mechanical procedures on site for performing mechanical inspections and tests of process equipment.

Abatement certification and abatement documentation is required for this violation. The documentation should include written verification of abatement, applicable measurements or monitoring results, and photographs or videos which you believe will be helpful. The abatement certification sheet is enclosed with the citations.

ABATEMENT DOCUMENTATION REQUIRED FOR THIS ITEM

Date By Which Violation Must be Abated:	09/19/2012
Proposed Penalty:	\$4900.00



Citation and Notification of Penalty

Company Name: GLOBAL PYROTECHNIC SOLUTIONS, INC.
Inspection Site: 10476 SUNSET DRIVE, Dittmer, MO 63023

Citation 1 Item 16 Type of Violation: **Serious**

29 CFR 1910.119(j)(3): The employer did not train employees involved in maintaining the on-going integrity of process equipment in an overview of the inspection process and the procedures required to perform the employee's job tasks.

At the time of the inspection, the employer had not trained employees on how to maintain process equipment used in PSM covered processes. Specifically, no employees were trained in what maintenance activities were required to keep the Stokes Tablet press in safe operating condition.

Abatement certification and abatement documentation is required for this violation. The documentation should include written verification of abatement, applicable measurements or monitoring results, and photographs or videos which you believe will be helpful. The abatement certification sheet is enclosed with the citations.

ABATEMENT DOCUMENTATION REQUIRED FOR THIS ITEM

Date By Which Violation Must be Abated:	09/19/2012
Proposed Penalty:	\$4900.00



Citation and Notification of Penalty

Company Name: GLOBAL PYROTECHNIC SOLUTIONS, INC.
Inspection Site: 10476 SUNSET DRIVE, Dittmer, MO 63023

Citation 1 Item 17 Type of Violation: **Serious**

29 CFR 1910.119(j)(5): The employer did not correct deficiencies in equipment that were outside acceptable limits in a safe and timely manner when necessary to assure safe operation.

At the time of the inspection, the employer failed to show that equipment deficiencies are corrected before further use, or in a safe and timely manner. Deficiencies with the Stokes Tablet press requiring employees to keep left hand positioned on the upper left adjustment wheel were not corrected before further use of the press.

Abatement certification and abatement documentation is required for this violation. The documentation should include written verification of abatement, applicable measurements or monitoring results, and photographs or videos which you believe will be helpful. The abatement certification sheet is enclosed with the citations.

ABATEMENT DOCUMENTATION REQUIRED FOR THIS ITEM

Date By Which Violation Must be Abated:	09/19/2012
Proposed Penalty:	\$4900.00



Citation and Notification of Penalty

Company Name: GLOBAL PYROTECHNIC SOLUTIONS, INC.
Inspection Site: 10476 SUNSET DRIVE, Dittmer, MO 63023

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 18 a Type of Violation: **Serious**

29 CFR 1910.119(m)(1): The employer did not investigate each incident which resulted in, or could reasonably have resulted in a catastrophic release of highly hazardous chemical in the workplace.

At the time of the inspection, it was determined that an incident occurred several weeks prior to the inspection that was not investigated. A fire/flash occurred while burning hot trash near warehouse 4 and a brush fire was started. Employees responded with fire extinguishers to limit the spread of the fire.

Abatement certification and abatement documentation is required for this violation. The documentation should include written verification of abatement, applicable measurements or monitoring results, and photographs or videos which you believe will be helpful. The abatement certification sheet is enclosed with the citations.

ABATEMENT DOCUMENTATION REQUIRED FOR THIS ITEM

Date By Which Violation Must be Abated:	09/19/2012
Proposed Penalty:	\$4900.00



Citation and Notification of Penalty

Company Name: GLOBAL PYROTECHNIC SOLUTIONS, INC.
Inspection Site: 10476 SUNSET DRIVE, Dittmer, MO 63023

Citation 1 Item 18 b Type of Violation: **Serious**

29 CFR 1910.119(m)(2): An incident investigation was not initiated as promptly as possible, but not later than 48 hours following the incident.

At the time of the inspection, it was found that a flash/explosion had occurred near warehouse 4 and no incident investigation had been initiated.

Abatement certification and abatement documentation is required for this violation. The documentation should include written verification of abatement, applicable measurements or monitoring results, and photographs or videos which you believe will be helpful. The abatement certification sheet is enclosed with the citations.

ABATEMENT DOCUMENTATION REQUIRED FOR THIS ITEM

Date By Which Violation Must be Abated: 09/19/2012

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: 279658
Inspection Date(s): 03/06/2012 - 09/04/2012
Issuance Date: 09/04/2012



Citation and Notification of Penalty

Company Name: GLOBAL PYROTECHNIC SOLUTIONS, INC.
Inspection Site: 10476 SUNSET DRIVE, Dittmer, MO 63023

Citation 1 Item 19 Type of Violation: **Serious**

29 CFR 1910.119(o)(1): Employers did not verify that the procedures and practices developed under the standard were adequate:

At the time of the inspection, the employer had not conducted an audit of all 14 elements of the PSM program to verify that it was effective in controlling the hazards of the covered processes, manufacturing fireworks and incendiary pellets. Audit must be completed every 3 years.

Abatement certification and abatement documentation is required for this violation. The documentation should include written verification of abatement, applicable measurements or monitoring results, and photographs or videos which you believe will be helpful. The abatement certification sheet is enclosed with the citations.

ABATEMENT DOCUMENTATION REQUIRED FOR THIS ITEM

Date By Which Violation Must be Abated:	09/19/2012
Proposed Penalty:	\$4900.00

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: 279658
Inspection Date(s): 03/06/2012 - 09/04/2012
Issuance Date: 09/04/2012



Citation and Notification of Penalty

Company Name: GLOBAL PYROTECHNIC SOLUTIONS, INC.
Inspection Site: 10476 SUNSET DRIVE, Dittmer, MO 63023

Citation 1 Item 20 Type of Violation: **Serious**

29 CFR 1910.132(d)(1)(i): The employer did not select and have each affected employee use, the types of personal protective equipment that would protect the affected employee(s) from the hazards identified in the hazard assessment:

At the time of the inspection, the employer did not enforce the use of 100% cotton clothing for employees working with explosives.

Abatement certification and abatement documentation is required for this violation. The documentation should include written verification of abatement, applicable measurements or monitoring results, and photographs or videos which you believe will be helpful. The abatement certification sheet is enclosed with the citations.

ABATEMENT DOCUMENTATION REQUIRED FOR THIS ITEM

Date By Which Violation Must be Abated:	09/19/2012
Proposed Penalty:	\$4900.00

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: 279658
Inspection Date(s): 03/06/2012 - 09/04/2012
Issuance Date: 09/04/2012



Citation and Notification of Penalty

Company Name: GLOBAL PYROTECHNIC SOLUTIONS, INC.
Inspection Site: 10476 SUNSET DRIVE, Dittmer, MO 63023

Citation 1 Item 21 Type of Violation: **Serious**

29 CFR 1910.147(c)(4)(i): Procedures were not developed, documented and utilized for the control of potentially hazardous energy when employees were engaged in activities covered by this section: (a)(LOCATION)(IDENTIFY SPECIFIC OPERATIONS AND/OR CONDITIONS)(IDENTIFY MACHINERY OR EQUIPMENT)(THIS INCLUDES ENFORCEMENT OF PROCEDURES)

At the time of the inspection, the employer had not developed machine specific lockout tagout procedures for equipment such as but not limited to the Stokes Tablet mechanical power press.

Abatement certification and abatement documentation is required for this violation. The documentation should include written verification of abatement, applicable measurements or monitoring results, and photographs or videos which you believe will be helpful. The abatement certification sheet is enclosed with the citations.

ABATEMENT DOCUMENTATION REQUIRED FOR THIS ITEM

Date By Which Violation Must be Abated:
Proposed Penalty:

09/19/2012
\$4900.00

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: 279658
Inspection Date(s): 03/06/2012 - 09/04/2012
Issuance Date: 09/04/2012



Citation and Notification of Penalty

Company Name: GLOBAL PYROTECHNIC SOLUTIONS, INC.
Inspection Site: 10476 SUNSET DRIVE, Dittmer, MO 63023

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 22 a Type of Violation: **Serious**

29 CFR 1910.217(b)(8)(i): Power press control system on mechanical power press was not provided with main power disconnect switch, capable of being locked only in the off position:

At the time of the inspection, the Stokes Tablet mechanical power press in Press Room #1 was not equipped with a lockable power disconnect switch.

Abatement certification and abatement documentation is required for this violation. The documentation should include written verification of abatement, applicable measurements or monitoring results, and photographs or videos which you believe will be helpful. The abatement certification sheet is enclosed with the citations.

ABATEMENT DOCUMENTATION REQUIRED FOR THIS ITEM

Date By Which Violation Must be Abated: 09/19/2012
Proposed Penalty: \$3500.00

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: GLOBAL PYROTECHNIC SOLUTIONS, INC.
Inspection Site: 10476 SUNSET DRIVE, Dittmer, MO 63023

Citation 1 Item 22 b Type of Violation: **Serious**

29 CFR 1910.217(c)(1)(i): The employer did not provide and ensure the usage of point of operation guards or properly applied point of operation devices on every operation performed on mechanical power press:

At the time of the inspection, the Stokes Tablet mechanical power press used to press incendiary pellets was not equipped with guards to prevent the operator or other employees from placing hands into the point of operation creating an amputation hazard.

Abatement certification and abatement documentation is required for this violation. The documentation should include written verification of abatement, applicable measurements or monitoring results, and photographs or videos which you believe will be helpful. The abatement certification sheet is enclosed with the citations.

ABATEMENT DOCUMENTATION REQUIRED FOR THIS ITEM

Date By Which Violation Must be Abated: 09/19/2012

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

Inspection Number: 279658
Inspection Date(s): 03/06/2012 - 09/04/2012
Issuance Date: 09/04/2012



Citation and Notification of Penalty

Company Name: GLOBAL PYROTECHNIC SOLUTIONS, INC.
Inspection Site: 10476 SUNSET DRIVE, Dittmer, MO 63023

Citation 1 Item 23 Type of Violation: **Serious**

29 CFR 1910.217(f)(2): Operators were not trained and instructed in the safe method of work before starting work on mechanical power press:

At the time of the inspection, employees operating the Stokes Tablet mechanical power press to produce incendiary pellets had not been trained in the safe operation of the press.

Abatement certification and abatement documentation is required for this violation. The documentation should include written verification of abatement, applicable measurements or monitoring results, and photographs or videos which you believe will be helpful. The abatement certification sheet is enclosed with the citations.

ABATEMENT DOCUMENTATION REQUIRED FOR THIS ITEM

Date By Which Violation Must be Abated: 09/19/2012
Proposed Penalty: \$4900.00

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: 279658
Inspection Date(s): 03/06/2012 - 09/04/2012
Issuance Date: 09/04/2012



Citation and Notification of Penalty

Company Name: GLOBAL PYROTECHNIC SOLUTIONS, INC.
Inspection Site: 10476 SUNSET DRIVE, Dittmer, MO 63023

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 24 a Type of Violation: **Serious**

29 CFR 1910.219(d)(1): Pulley with parts seven feet or less from the floor or work platform was not guarded in accordance with the requirements specified in 29 CFR 1910.219(m) and (o):

At the time of the inspection, the Stokes Tablet mechanical power press was found to have been operated without the guard installed to cover the drive belts and pulleys.

Abatement certification and abatement documentation is required for this violation. The documentation should include written verification of abatement, applicable measurements or monitoring results, and photographs or videos which you believe will be helpful. The abatement certification sheet is enclosed with the citations.

ABATEMENT DOCUMENTATION REQUIRED FOR THIS ITEM

Date By Which Violation Must be Abated:	09/19/2012
Proposed Penalty:	\$3500.00

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: GLOBAL PYROTECHNIC SOLUTIONS, INC.
Inspection Site: 10476 SUNSET DRIVE, Dittmer, MO 63023

Citation 1 Item 24 b Type of Violation: **Serious**

29 CFR 1910.219(d)(1): Belts seven feet or less from the floor or work platform were not guarded in accordance with the requirements specified in 29 CFR 1910.219(m) and (o):

At the time of the inspection, the Stokes Tablet mechanical power press was found to have been operated without the guard installed to cover the drive belts and pulleys.

Abatement certification and abatement documentation is required for this violation. The documentation should include written verification of abatement, applicable measurements or monitoring results, and photographs or videos which you believe will be helpful. The abatement certification sheet is enclosed with the citations.

ABATEMENT DOCUMENTATION REQUIRED FOR THIS ITEM

Date By Which Violation Must be Abated:

09/25/2012

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

Inspection Number: 279658
Inspection Date(s): 03/06/2012 - 09/04/2012
Issuance Date: 09/04/2012



Citation and Notification of Penalty

Company Name: GLOBAL PYROTECHNIC SOLUTIONS, INC.
Inspection Site: 10476 SUNSET DRIVE, Dittmer, MO 63023

Citation 1 Item 25 Type of Violation: **Serious**

29 CFR 1910.307(c): Equipment, wiring methods, and installations of equipment in hazardous (classified) locations were not intrinsically safe, approved for the hazardous (classified) location, or safe for the hazardous (classified) location:

At the time of the inspection, electrical equipment such as the window air conditioner in press building #1 was not approved for the classification Class II Division 2.

Abatement certification and abatement documentation is required for this violation. The documentation should include written verification of abatement, applicable measurements or monitoring results, and photographs or videos which you believe will be helpful. The abatement certification sheet is enclosed with the citations.

ABATEMENT DOCUMENTATION REQUIRED FOR THIS ITEM

Date By Which Violation Must be Abated:	09/19/2012
Proposed Penalty:	\$4900.00

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: 279658
Inspection Date(s): 03/06/2012 - 09/04/2012
Issuance Date: 09/04/2012



Citation and Notification of Penalty

Company Name: GLOBAL PYROTECHNIC SOLUTIONS, INC.
Inspection Site: 10476 SUNSET DRIVE, Dittmer, MO 63023

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

29 CFR 1910.109(c)(2)(iii): Property upon which Class I magazines are located and property where Class II magazines are located outside of buildings were not posted with signs reading "Explosives-Keep Off."

At the time of the inspection, shipping containers used as magazines were not posted with warning signs. No method was used to identify the hazard in each container.

Date By Which Violation Must be Abated:
Proposed Penalty:

09/19/2012
\$.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: GLOBAL PYROTECHNIC SOLUTIONS, INC.
Inspection Site: 10476 SUNSET DRIVE, Dittmer, MO 63023

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

29 CFR 1910.109(d)(2)(i): Vehicles used for transporting explosives shall be strong enough to carry the load without difficulty and be in good mechanical condition. If vehicles do not have a closed body, the body shall be covered with a flameproof and moisture proof tarpaulin or other effective protection against moisture and sparks. All vehicles used for the transportation of explosives shall have tight floors and any exposed spark-producing metal on the inside of the body shall be covered with wood or other non-sparking materials to prevent contact with packages of explosives. Packages of explosives shall not be loaded above the sides of an open-body vehicle.

At the time of the inspection, trucks used to transport explosives on the company property were not equipped to protect explosives from the hazards of moisture and/or sparks.

Date By Which Violation Must be Abated:
Proposed Penalty:

09/19/2012
\$.00



Citation and Notification of Penalty

Company Name: GLOBAL PYROTECHNIC SOLUTIONS, INC.
Inspection Site: 10476 SUNSET DRIVE, Dittmer, MO 63023

Citation 2 Item 3 Type of Violation: **Other-than-Serious**

29 CFR 1910.109(d)(2)(ii)(a): Exterior markings or placards required on applicable vehicles were not as follows for the various classes of commodities:

Commodity	Type of marking or placard
Explosives, Class A, any quantity or a combination of Class A and Class B explosives.	Explosives A (Red letters on white background).
Explosives, Class B, and quantity.	Explosives B (Red letters on white background).
Oxidizing material (blasting agents, ammonium nitrate, etc.), 1,000 pounds or more gross weight.	Oxidizers (Yellow letters on black background).

At the time of the inspection, pickup trucks used to transport explosives within the facility were not equipped with signs to identify the hazardous materials being transported.

Date By Which Violation Must be Abated:
Proposed Penalty:

09/19/2012
\$.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: 279658
Inspection Date(s): 03/06/2012 - 09/04/2012
Issuance Date: 09/04/2012



Citation and Notification of Penalty

Company Name: GLOBAL PYROTECHNIC SOLUTIONS, INC.
Inspection Site: 10476 SUNSET DRIVE, Dittmer, MO 63023

Citation 2 Item 4 Type of Violation: **Other-than-Serious**

29 CFR 1910.119(j)(6)(iii): The employer did not assure that maintenance materials, spare parts and equipment were suitable for the process application for which they were used.

At the time of the inspection, the employer did not properly control replacement parts. Replacement parts such a dies for the Stokes Tablet press were not part of a process to ensure that they were compatible for the use in manufacture of the incendiary pellets.

Date By Which Violation Must be Abated:
Proposed Penalty:

09/19/2012
\$.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: 279658
Inspection Date(s): 03/06/2012 - 09/04/2012
Issuance Date: 09/04/2012



Citation and Notification of Penalty

Company Name: GLOBAL PYROTECHNIC SOLUTIONS, INC.
Inspection Site: 10476 SUNSET DRIVE, Dittmer, MO 63023

Citation 2 Item 5 Type of Violation: **Other-than-Serious**

29 CFR 1910.134(d)(1)(ii): The employer did not select and use a NIOSH-certified respirator in compliance with the conditions of its certification:

At the time of the inspection, the employer supplied a nuisance dust mask that was not Niosh approved. The MCR safety model RPDM1 was supplied to employees working in Press room #1 and the box stated "Does not provide NIOSH approved respiratory protection."

Date By Which Violation Must be Abated:
Proposed Penalty:

09/19/2012
\$.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: 279658
Inspection Date(s): 03/06/2012 - 09/04/2012
Issuance Date: 09/04/2012



Citation and Notification of Penalty

Company Name: GLOBAL PYROTECHNIC SOLUTIONS, INC.
Inspection Site: 10476 SUNSET DRIVE, Dittmer, MO 63023

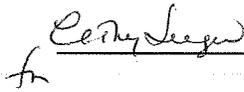
Citation 2 Item 6 Type of Violation: **Other-than-Serious**

29 CFR 1910.134(g)(1)(i)(A): Respirators with tight-fitting facepieces were worn by employees who had facial hair that came between the sealing surface of the facepiece and the face or that interfered with valve function:

At the time of the inspection, employees required to wear 1/2 mask respirators were allowed to have full beards that negated the protection accorded the respirators.

Date By Which Violation Must be Abated:
Proposed Penalty:

09/19/2012
\$.00



William McDonald
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
1222 Spruce Street
Room 9.104
Saint Louis, MO 63103
Phone: 314-425-4249 Fax: 314-425-4289



INVOICE / DEBT COLLECTION NOTICE

Company Name: GLOBAL PYROTECHNIC SOLUTIONS, INC.
Inspection Site: 10476 SUNSET DRIVE, Dittmer, MO 63023
Issuance Date: 09/04/2012

Summary of Penalties for Inspection Number	279658
Citation 1, Serious	\$116900.00
Citation 2, Other-than-Serious	\$.00
TOTAL PROPOSED PENALTIES	\$116900.00

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.

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

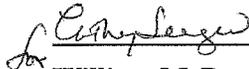
If a personal check is issued, it will be converted into an electronic fund transfer (EFT). This means that our bank will copy your check and use the account information on it to electronically debit your account for the amount of the check. The debit from your account will then usually occur within 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.



William McDonald
Area Director

9/4/12

Date