

U.S. Department of Labor
Occupational Safety and Health Administration
Houston South Area Office
17625 El Camino Real, Suite 400
Houston, TX 77058
Phone: (281)286-0583 FAX: (281)286-6352



Citation and Notification of Penalty

To:
Piping Technology & Products, Inc.

and its successors
3701 Holmes
Houston, TX 77051

Inspection Site:
3701 Holmes
Houston, TX 77051

Inspection Number: 312928344
Inspection Date(s): 06/29/2011 - 12/27/2011

Issuance Date: 12/28/2011

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. **The penalty dollar amounts need not be posted and may be marked out or covered up prior to posting.**

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 page 4 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 violations which you do not contest, you should notify the U.S. Department of Labor Area Office promptly by letter that you have taken appropriate corrective action within the time frame set forth on this Citation. Please inform the Area Office in writing of the abatement steps you have taken and of their dates, together with adequate supporting documentation, e.g., drawings or photographs of corrected conditions, purchase/work orders related to abatement actions, air sampling results, etc. (Please see attached "**Corrective Action Verification.**")

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.

Corrective Action Verification

Dear Sir:

OSHA's inspections are intended to result in the abatement/correction of violations of the OSHAct. To verify that this has been accomplished, Section 1903.19 requires that an employer certify to OSHA, within ten (10) days of the final abatement date that each item cited has been corrected.

This abatement certification letter must include the following:

Name of Employer

OSHA Inspection Number

Citation and Item Numbers to which the submission relates

The date each item was abated, specific action taken to abate each violation and appropriate documentation for the action taken. Where appropriate, this documentation should include photographs, work orders, purchase orders, personal protective equipment provided, standard operation procedures, copies of written programs, engineering controls, monitoring data, etc. Adequate supporting documentation may allow us to close the case file. **The lack of adequate documentation could result in a follow-up inspection.**

A statement that affected employees and their representatives have been informed of the abatement actions

A statement that the information submitted is accurate

The signature of the employer or the employer's authorized representative.

Following is a sample format that may be used for this submittal:

Name of Employer _____

<u>Citation Number</u>	<u>Item No. Instance No.</u>	<u>Date Item Abated</u>	<u>Corrective Action Taken</u>
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Date this letter of submission posted _____

I certify that the information submitted is correct.

Employer or Authorized Representative



NOTICE TO EMPLOYEES OF INFORMAL CONFERENCE

An informal conference has been scheduled with OSHA to discuss the citation(s) issued on _____ 12/28/2011. The conference will be held at the OSHA office located at Houston South Area Office, 17625 El Camino Real, Suite 400, Houston, TX, 77058 on _____ at _____. Employees and/or representatives of employees have a right to attend an informal conference.

U.S. Department of Labor Occupational Safety and Health Administration
17625 El Camino Real; Suite 400
Houston, TX 77058
Phone: (281)286-0583, Fax: (281)286-6352

Reply to the Attention of: HSAO

Dear Employer:

Under a law passed by Congress in 1996, the Small Business Administration (SBA) has established the SBA Ombudsman and SBA Regional Fairness Boards to investigate small business complaints pertaining to federal agency enforcement actions.

If you are a small business and believe you have been treated unfairly by the Occupational Safety and Health Administration (OSHA), you may file a written, signed complaint with the SBA Ombudsman at:

Small Business Administration
Office of the National Ombudsman
409 Third Street, S.W., MC2120
Washington, DC 20024-0005
Phone: (202)205-2417
Fax: (202)418-5719

You can also access and download the Complaint/Comment form by visiting their website at:

<http://www.sba.gov/aboutsba/sbaprograms/ombudsman/index.html>

Or, call Toll Free: 1-888-REGFAIR

NOTE: Filing a complaint with the SBA Ombudsman does not affect any obligation you may have to comply with an OSHA citation or other enforcement action. Nor does it mean you need not take other available legal steps to protect your interest.

Your support in worker occupational health and safety is appreciated.

Sincerely,

Mark R. Briggs
Area Director



Citation and Notification of Penalty

Company Name: Piping Technology & Products, Inc.
Inspection Site: 3701 Holmes, Houston, TX 77051

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

29 CFR 1910.147(c)(5)(ii) (D): Lockout/ tagout devices did not indicate the identity of the employee applying the device(s):

The employer does not ensure lockout devices indicate the identity of the authorized employee who applied the device. This was observed on or about September 23, 2011, and times prior thereto, on Band Saw #3, Manufacturer: Marvel, MODEL#: Series B Mark II at 3701 Holmes Rd Houston, TX, exposing employees to struck-by hazards and amputation.

Pursuant to 29 C.F. R. 1903.19, within 10 days of the abatement date of this citation, the employer must submit documentation showing compliance with the standard, including describing the steps that it is taking to ensure that lockout devices indicate the identity of employees applying the devices.

Date By Which Violation Must be Abated: 01/10/2012
Proposed Penalty: \$ 7000.00

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

29 CFR 1910.147(c)(6)(i): The employer did not conduct a periodic inspection of the energy control procedure at least annually to ensure that the procedure and the requirement of this standard were being followed:

The employer does not conduct periodic inspections of the energy control procedures. This occurred on or about June 29, 2011, and times prior thereto, at 3701 Holmes Rd Houston, TX, exposing employees to struck-by, caught-in, and hazards associated with the release of stored energy.

Pursuant to 29 C.F.R. 1903.19, within 10 days of the abatement date of this citation, the employer must submit documentation showing compliance with the standard, including describing the steps that it is taking to ensure periodic inspections are conducted of all energy control procedures.

Date By Which Violation Must be Abated: 01/10/2012
Proposed Penalty: \$ 7000.00



Citation and Notification of Penalty

Company Name: Piping Technology & Products, Inc.
Inspection Site: 3701 Holmes, Houston, TX 77051

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

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

29 CFR 1910.147(c)(7)(i) (A): Each authorized employee(s) did not receive training in the recognition of applicable hazardous energy sources, the type and magnitude of the energy available in the workplace, and the methods and means necessary for energy isolation and control:

The employer does not ensure authorized employees are trained on the means and methods necessary to control hazardous energy. This occurred on or about June 29, 2011, and times prior thereto, at 3701 Holmes Rd Houston, TX, exposing employees to struck-by, caught-in, and hazards associated with the release of stored energy.

Pursuant of 29 C.F. R. 1903.19, within 10 days of the abatement date of this citation, the employer must submit documentation showing compliance with the standard, including describing the steps that it is taking to ensure that authorized employees are trained on the means and methods to control hazardous energy.

Date By Which Violation Must be Abated: 01/10/2012
Proposed Penalty: \$ 7000.00



Citation and Notification of Penalty

Company Name: Piping Technology & Products, Inc.
Inspection Site: 3701 Holmes, Houston, TX 77051

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

29 CFR 1910.147(c)(7)(i) (B): Each affected employee(s) was not instructed in the purpose and use of the energy control procedure:

The employer does not ensure affected employees are trained in the purpose and use of energy control procedures. This occurred on or about August 31, 2011, and times prior thereto, at 3701 Holmes Rd Houston, TX, exposing employees to struck-by, caught-in, and hazards associated with the release of stored energy.

Pursuant to 29 C.F. R. 1903.19, within 10 days of the abatement date of this citation, the employer must submit documentation showing compliance with the standard, including describing the steps that it is taking to ensure that affective employees are trained on the means and methods to control hazardous energy.

Date By Which Violation Must be Abated: 01/10/2012



Citation and Notification of Penalty

Company Name: Piping Technology & Products, Inc.
Inspection Site: 3701 Holmes, Houston, TX 77051

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

29 CFR 1910.147(d)(4)(i): Lock out or tagout devices were not affixed to each energy isolating device by authorized employees:

The employer does not ensure that lockout devices are affixed to energy isolating devices, at 3701 Holmes Rd Houston, TX, exposing employees to struck-by hazards and amputations.

- a) This was observed on or about June 29, 2011, and times prior thereto, in the roll department, Montgomery Large Roll Machine; employees were replacing the top roller without using lockout devices.
- b) This was observed on or about August 31, 2011, at the roll department, MG Industries Eye Burner #2, employees were performing maintenance without using lockout devices.
- c) This was observed on or about October 3, 2011, in the Cut Chop, Band Saw #4, Marvel Series B Mark II, employees were performing maintenance without using lockout devices.

Pursuant to 29 C.F.R. 1903.19, within 10 days of the abatement date of this citation, the employer must submit documentation showing compliance that it is in compliance with the standard, including describing the steps that it is taking to ensure that lockout devices are affixed to all isolation devices.

Date By Which Violation Must be Abated: 01/10/2012
Proposed Penalty: \$ 7000.00



Citation and Notification of Penalty

Company Name: Piping Technology & Products, Inc.
Inspection Site: 3701 Holmes, Houston, TX 77051

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

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

29 CFR 1910.179(j)(2): Items listed in paragraph (j)(2)(i) through (j)(2)(vii) of this section were not inspected for defects at intervals as defined in paragraph (j)(1)(ii) of this section, including observation during operation for any defects appearing between inspections, and all deficiencies were not carefully examined and a determination made as to whether they constituted a safety hazard:

The employer does not perform frequent inspections to detect defects. This occurred on or about June 29, 2011, and times prior thereto, at 3701 Holmes Rd Houston, TX, exposing employees to struck-by hazards.

- a) Overhead Crane, 10 Ton Proserve in the Cut Shop was operated with defective brakes.
- b) Overhead Crane #11, 10 Ton General Crane in Bellows area was operated with defective brakes.
- c) Overhead Crane #3, 10 Ton General Crane in Bellows area was operated with defective brakes.

Pursuant to 29 C.F. R. 1903.19, within 10 days of the abatement date of this citation, the employer must submit documentation showing compliance with the standard, including describing the steps that it is taking to ensure that frequent inspection are conducted at required intervals, and when defects are found, safety defects are corrected prior to allowing continued use of the crane.

Date By Which Violation Must be Abated: 01/10/2012
Proposed Penalty: \$ 7000.00



Citation and Notification of Penalty

Company Name: Piping Technology & Products, Inc.
Inspection Site: 3701 Holmes, Houston, TX 77051

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

29 CFR 1910.179(j)(3): A complete periodic inspection of the crane had not taken place in the past 1 to 12 month period as described in paragraph (j)(1)(ii)(b) of this section.

The employer does not perform complete periodic inspections of cranes annually to detect defects. This occurred on or about June 29, 2011, and times prior thereto, at 3701 Holmes Rd Houston, TX, exposing employees to struck by hazards. Cranes throughout the facility had not been completely inspected periodically for two years, resulting in hazards including but not limited to being operated with defective brakes on the following cranes:

- a) 10 Ton Proverse Crane in the Cut Shop.
- b) 10 Ton General Crane in the Bellows Area, Crane #11.
- c) 10 Ton General Crane in the Bellows Area, Crane #3.

Pursuant to 29 C.F.R. 1903.19, within 10 days of the abatement date of this citation, the employer must submit documentation showing compliance with the standard, including describing the steps that it is taking to ensure that periodic inspections are conducted within required intervals, and all deficiencies identified are corrected prior to permitting use of the cranes.

Date By Which Violation Must be Abated:

01/10/2012



Citation and Notification of Penalty

Company Name: Piping Technology & Products, Inc.
Inspection Site: 3701 Holmes, Houston, TX 77051

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

29 CFR 1910.179(I)(3)(ii): Adjustments on crane(s) were not maintained to assure correct function of brakes:

The employer does not ensure that adjustment are maintained on brakes. This occurred on June 29, 2011, employees exposed to struck-by hazards.

- a) Overhead Crane, 10 Ton Proserve in the cut shop was operated with defective brakes.
- b) Overhead Crane #11, 10 Ton General Crane in Bellows area was operated with defective brakes.
- c) Overhead Crane #3, 10 General Crane in Bellows area was operated with defective brakes.

Pursuant to 29 C.F. R. 1903.19, within 10 days of the abatement date of this citation, the employer must submit documentation showing compliance with the standard, including describing the steps that it is taking to ensure that adjustments are maintained to ensue proper function on all brakes.

Date By Which Violation Must be Abated:

01/10/2012



Citation and Notification of Penalty

Company Name: Piping Technology & Products, Inc.
Inspection Site: 3701 Holmes, Houston, TX 77051

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

29 CFR 1910.179 (n)(3)(ii)(a): Hoist rope shall not be kinked.

The employer does not ensure that the hoist rope on its overhead cranes are not kinked. This occurred on June 29, 2011 when the wire hoist rope on Crane #3, 10 Ton General Crane in the Cut Shop area was kinked, exposing employees to struck-by hazards.

Pursuant to 29 C.F.R. 1903.19, within 10 days of the abatement date of this citation, the employer must submit documentation showing compliance with the standard, including describing the steps that it is taking to ensure that wire ropes on overhead cranes are thoroughly inspected and documented, and that damaged ropes are removed from service.

Date By Which Violation Must be Abated:

01/10/2012



Citation and Notification of Penalty

Company Name: Piping Technology & Products, Inc.
Inspection Site: 3701 Holmes, Houston, TX 77051

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

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

29 CFR 1910.184(e)(1): Alloy steel sling(s) did not have permanently affixed durable identification stating size, grade, rated capacity, and reach:

The employer does not ensure that all alloy steel chain slings have tags identifying the size, grade, rated capacity, and reach. This was observed on or about August 10, 2011, and times prior thereto, at 3701 Holmes Rd Houston, TX, exposing employees to struck by hazards.

Pursuant to 29 C.F.R. 1903.19, within 10 days of the abatement date of this citation, the employer must submit documentation showing compliance with the standard, including describing the steps that it is taking to ensure that all alloy steel chain slings have tags identifying the size, grade, rated capacity, and reach.

Date By Which Violation Must be Abated: 01/10/2012
Proposed Penalty: \$ 3000.00



Citation and Notification of Penalty

Company Name: Piping Technology & Products, Inc.
Inspection Site: 3701 Holmes, Houston, TX 77051

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

29 CFR 1910.184(e)(3)(ii): Records of the most recent month in which each alloy steel chain sling was thoroughly inspected were not available for examination:

The employer does not make or maintain a record of the most recent month in which each alloy steel chain slings are thoroughly examined or available for examination. This was observed on or about August 10, 2011, and times prior thereto, at 3701 Holmes Rd Houston, TX, exposing employees to struck by hazards.

Pursuant to 29 C.F. R. 1903.19, within 10 days of the abatement date of this citation, the employer must submit documentation showing compliance with the standard, including describing the steps that it is taking to ensure that all alloy steel chain slings are thoroughly inspected and the record of the most recent month is available for examination.

Date By Which Violation Must be Abated: 01/10/2012



Citation and Notification of Penalty

Company Name: Piping Technology & Products, Inc.
Inspection Site: 3701 Holmes, Houston, TX 77051

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

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

The employer does not provide machine guarding to prevent struck-by hazards to employees at the exit side of shears; does not prevent struck-by hazards at the backside of the press brake and does not guard against unintended actuation of foot pedals and treadles on machines at 3701 Holmes St Houston, TX:

- a) This was observed on or about August 10, 2011, and times prior thereto on a Adria Model GHS-1330, Serial #4093/10717 Shear #1, the foot pedal was not guarded.
- b) This was observed on or about August 31, 2011, and times prior thereto on a Cyril Bath Mechanical Press brake, the foot pedal was not guarded.
- c) This was observed on or about August 31, 2011, and times prior thereto on a Wysong Shear on the coil processing line, the foot treadle was not guarded.
- d) This was observed on or about August 31, 2011, and times prior thereto on a Vickers Expander with hydraulic pump, the foot pedal was not guarded
- e) This was observed on or about August 31, 2011, and times prior thereto, on a Adira Model GHS-1330, serial #4093/10712D, the exit side of the shear was not guarded.
- f) This was observed on or about August 31, 2011, and times prior thereto, on a Steelweld mechanical shear #2, the exit side of the shear was not guarded.,
- g) This was observed on or about August 31, 2011, and times prior thereto, on a Cincinnati Model 5000, serial #45770, the exit side of the shear was not guarded,
- h) This was observed on or about August 31, 2011, and times prior thereto, on a Cincinnati Model 750, the exit side of the shear was not guarded,
- i) This was observed on or about August 31, 2011, and times prior thereto, on a Cyril Bath Mechanical press brake, the backside of the press brake was not guarded.

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: Piping Technology & Products, Inc.
Inspection Site: 3701 Holmes, Houston, TX 77051

- j) This was observed on or about August 31, 2011, and times prior thereto, on a Peddinghuas, the exit side of the shearing and angle iron shear.

Pursuant to 29 C.F.R. 1903.19, within 10 days of the abatement date of this citation, the employer must submit documentation showing compliance with the standard, including describing the steps that it is taking to ensure guards are provided on all machinery as required.

Date By Which Violation Must be Abated: 01/10/2012
Proposed Penalty: \$ 7000.00



Citation and Notification of Penalty

Company Name: Piping Technology & Products, Inc.
Inspection Site: 3701 Holmes, Houston, TX 77051

Citation 1 Item 8 Type of Violation: **Serious**

29 CFR 1910.212(a)(3)(ii): Point(s) of operation of machinery were not guarded to prevent employee(s) from having any part of their body in the danger zone(s) during operating cycle(s):

The employer does not insure that points of operation of machinery are guarded to prevent employees from having any part of their body in the danger zone during operation:

- a) This was observed on June 29, 2011, and times thereafter, on the 140 ton Piranha Model F351 punch press #1, serial #SEP140-021.
- b) This was observed on June 29, 2011, and times thereafter, on the 120 ton Piranha Model SEP 120 punch press #2.
- c) This was observed on August 10, 2011, and times thereafter, on the 120 ton Piranha Model SEP 120 punch press #3.
- d) This was observed on August 31, 2011, on the Steelweld mechanical shear #2: a 2-1/4" -3" opening beneath the barrier guard did not prevent employees from having any part of their body in the danger zone.
- e) This was observed on August 31, 2011, on the Cyril Bath mechanical press brake.
- f) This was observed on August 31, 2011, on the Piranha 120 ton punch press: the point of operation guard did not prevent access to the danger zone, and did not prevent struck-by injury should scrap, pressed parts, or shattered dies or stripper shoes be expelled from the point of operation.
- g) This was observed on August 31, 2011, on the Piranha 140 ton punch presses: the point of operation guard did not prevent access to the danger zone, and did not prevent struck-by injury should scrap, pressed parts, or shattered dies or stripper shoes be expelled from the point of operation.
- h) This was observed on August 31, 2011, on the Wysong shear on the coil processing line, the 1/2" gap beneath the barrier guard did not prevent employees from having any part of their body in the danger zone.

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: Piping Technology & Products, Inc.
Inspection Site: 3701 Holmes, Houston, TX 77051

Pursuant to 29 C.F.R. 1903.19, within 10 days of the abatement date of this citation, the employer must submit documentation showing compliance with the standard, including describing the steps that it is taking to ensure that all points of operation are adequately guarded or safeguarded.

Date By Which Violation Must be Abated: 01/04/2012
Proposed Penalty: \$ 7000.00

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

29 CFR 1910.212(b): Machine(s) designed for fixed location(s) were not securely anchored to prevent walking or moving:

The employer does not ensure that all machines designed for a fixed location are securely anchored. This occurred on or about August 10, 2011, and times prior thereto, at 3701 Holmes Rd Houston TX, exposing employees to struck by hazards.

- a) At the Teflon Department, a 12 speed Wilton Smith drill press was not anchored.
- a) At the Teflon Department, a Walker Turner drill press was not anchored.
- c) At the South wall, Bellows Department, a Vickers expander with hydraulic pump was not securely anchored.
- d) At the South wall, Bellows Department, a blade alignment tool was standing on pallets and not anchored.

Pursuant to 29 C.F.R. 1903.19, within 10 days of the abatement date of this citation, the employer must submit documentation showing compliance with the standard, including describing the steps that it is taking to ensure that all machinery designed for fixed location(s) are securely anchored to prevent walking and moving.

Date By Which Violation Must be Abated: 01/10/2012
Proposed Penalty: \$ 7000.00

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: Piping Technology & Products, Inc.
Inspection Site: 3701 Holmes, Houston, TX 77051

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

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

29 CFR 1910.213(i)(1): All portions of the saw blade were not enclosed or guarded, except for the working portion of the blade between the bottom of the guide rolls and the saw table.

The employer does not guard all portions of the blade, except for the working portion, on a Rockwell-Delta 20" variable speed band saw, Model # 28-662, Serial # 1740484. This was observed on or about August 10, 2011, exposing employees to struck-by hazards.

Pursuant to 29 C.F.R. 1903.19, within 10 days of the abatement date of this citation, the employer must submit documentation showing compliance with the standard, including describing the steps that it is taking to ensure that the blades on all band saws are guarded except for the working portion of the blade.

Date By Which Violation Must be Abated: 01/10/2012
Proposed Penalty: \$ 7000.00



Citation and Notification of Penalty

Company Name: Piping Technology & Products, Inc.
Inspection Site: 3701 Holmes, Houston, TX 77051

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

29 CFR 1910.213(i)(3): Feed rolls of band saw(s) were not protected with a suitable guard to prevent the hands of the operator from coming in contact with the inrunning rolls at any point:

The employer does not guard the feed rolls on a Rockwell-Delta 20" variable speed band saw, Model#28-662, Serial #1740484. This was observed on or about August 10, 2011, exposing employees to caught-in/by hazards.

Pursuant to 29 C.F.R. 1903.19, within 10 days of the abatement date of this citation, the employer must submit documentation showing compliance with the standard, including describing the steps that it is taking to ensure that all feed rolls on band saws are guarded.

Date By Which Violation Must be Abated: 01/10/2012



Citation and Notification of Penalty

Company Name: Piping Technology & Products, Inc.
Inspection Site: 3701 Holmes, Houston, TX 77051

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

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

29 CFR 1910.215(a)(4): Work rest(s) on grinding machinery were not adjusted closely to the wheel with a maximum opening of one eighth inch:

The employer does not ensure that grinder work rests are adjusted so that the maximum opening is one-eighth of an inch, exposing employees to struck-by hazards:

- a) This was observed on or about June 29, 2011, and times prior thereto, on a bench grinder, Manufacturer: DEWALT 578 in the maintenance area, having had an opening that was approximately 1/2 inch.
- b) This was observed on or about June 29, 2011, and times prior thereto, bench grinder, Manufacturer: Dayton in the Sweco area, having had an opening that was approximately 1 inch.
- c) This was observed on or about August 10, 2011, and times prior thereto, on a bench grinder, Manufacturer: DEWALT 578 in cut shop area, having had an opening that was approximately 1/2 inch and also 1/4 inch.
- d) This was observed on or about August 10, 2011, and times prior thereto, on a bench grinder, Manufacturer: JET tool Equipment in the welding area, having had an opening that was approximately 1/4 inch.

Pursuant to 29 C.F. R. 1903.19, within 10 days of the abatement date of this citation, the employer must submit documentation showing compliance with the standard, including the description of the steps that it is being taken to ensure that work rest openings do not exceed one-eighth inch on abrasive wheel machinery.

Date By Which Violation Must be Abated: 01/10/2012
Proposed Penalty: \$ 7000.00

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: Piping Technology & Products, Inc.
Inspection Site: 3701 Holmes, Houston, TX 77051

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

29 CFR 1910.215(b)(9): The distance between the abrasive wheel periphery(s) and the adjustable tongue or the end of the safety guard peripheral member at the top exceeded one fourth inch:

The employer does not ensure the distance between the wheel periphery and the adjustable peripheral member does not exceed one-fourth inch, exposing employees to struck-by hazards:

- a) This was observed on or about June 29, 2011, and times prior thereto, on a Dewalt 578 bench grinder, in the maintenance area, had an opening of approximately 1/2 inch.
- b) This was observed on or about June 29, 2011, and times prior thereto, on a Dayton bench grinder, in the Sweco area, had an opening that was approximately 1 inch.
- c) This was observed on or about August 10, 2011, and times prior thereto, on a Dewalt 578 bench grinder, in cut shop area, had an opening that was approximately 2 inches.
- d) This was observed on or about August 31, 2011, and times prior thereto, on a JET Tool Equipment Bench grinder in the Bellows welding area, had an opening that was approximately 3/4 inch.

Pursuant to 29 C.F.R. 1903.19, within 10 days of the abatement date of this citation, the employer must submit documentation showing compliance with the standard, including describing the steps that it is taking to ensure the distance between the wheel periphery and the adjustable tongues does not exceed one-fourth inch on abrasive wheel machinery.

Date By Which Violation Must be Abated:

01/10/2012



Citation and Notification of Penalty

Company Name: Piping Technology & Products, Inc.
Inspection Site: 3701 Holmes, Houston, TX 77051

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

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

29 CFR 1910.217(b)(3)(i): Mechanical power press(es) using full revolution clutches did not incorporate a single stroke mechanism:

The Loshbough & Jordan Press #8 is not equipped with a single stroke mechanism. This occurred on or about September 13, 2011, and times prior thereto, in the press department, exposing the operator to struck-by hazards.

Pursuant to 29 C.F.R. 1903.19, within 10 days of the abatement date of this citation, the employer must submit documentation showing that it is in compliance with the standard, including describing the steps that it is taking to ensure that the press is equipped with a single stroke mechanisms.

Date By Which Violation Must be Abated: 01/17/2012
Proposed Penalty: \$ 5000.00



Citation and Notification of Penalty

Company Name: Piping Technology & Products, Inc.
Inspection Site: 3701 Holmes, Houston, TX 77051

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

29 CFR 1910.217(b)(6)(ii): Two hand trip system(s) on mechanical power press(es) using full revolution clutches did not incorporate an antirepeat feature:

The two-hand trip mechanism did not incorporate an antirepeat feature on a Loshbough & Jordan Press #8. This was observed on or about September 13, 2011, at 3701 Holmes Rd Houston, TX, exposing the operator to struck-by hazards.

Pursuant to 29 C.F.R. 1903.19, within 10 days of the abatement date of this citation, the employer must submit documentation showing compliance with the standard, including describing the steps that it is taking to ensure that all two hand trip system(s) on mechanical power press(es) using full revolution clutches incorporate an antirepeat feature.

Date By Which Violation Must be Abated: 01/17/2012



Citation and Notification of Penalty

Company Name: Piping Technology & Products, Inc.
Inspection Site: 3701 Holmes, Houston, TX 77051

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

29 CFR 1910.305(b)(1): Unused openings in boxes, cabinets, or fittings were not effectively closed:

The employer does not ensure that all unused opening are effectively closed at 3701 Holmes Rd Houston TX, exposing employees to electrical hazards.

- a) This occurred on or about June 29, 2011, and times prior thereto, in the cut shop area where a cabinet containing a small roller switch was observed.
- b) This occurred on or about June 29, 2011, and times prior thereto, on the transformer for the large hydraulic press.
- c) This occurred on or about August 10, 2011, and times prior thereto, in the cut shop area, at the main disconnect on the Piranha Punch Press #3.
- d) This occurred on or about August 10, 2011, and times prior thereto, in the Bellows area, at an electrical motor for small hydraulic press.
- e) This occurred on or about August 10, 2011, and times prior thereto, where the condition was present on a main disconnect and on a control box for a Wysong Shear.

Pursuant of 29 C.F. R. 1903.19, within 10 days of the abatement date of this citation, the employer must submit documentation showing compliance with the standard, including describing the steps that it is taking to ensure that all unused opening are effectively closed.

Date By Which Violation Must be Abated: 01/10/2012
Proposed Penalty: \$ 5000.00



Citation and Notification of Penalty

Company Name: Piping Technology & Products, Inc.
Inspection Site: 3701 Holmes, Houston, TX 77051

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

29 CFR 1926.100(a): Employees were not protected by protective helmets while working in areas where there was a possible danger of head injury from impact, or from falling or flying objects, or from electrical shock and burns:

The employer does not ensure employees are protected from falling objects such as materials and tools, from an approximate height of 11 feet. This occurred on or about June 29, 2011, and times prior thereto, at 3701 Holmes Rd Houston, TX, exposing employees to struck-by hazards.

Pursuant to 29 C.F.R. 1903.19, within 10 days of the abatement date of this citation, the employer must submit documentation showing compliance with the standard, including the provision of head protection to employees exposed to struck-by hazards from falling objects.

Date By Which Violation Must be Abated: 01/10/2012
Proposed Penalty: \$ 4000.00



Citation and Notification of Penalty

Company Name: Piping Technology & Products, Inc.
Inspection Site: 3701 Holmes, Houston, TX 77051

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

29 CFR 1926.501(b)(10) : The employer did not provide each employee engaged in roofing activities on low-slope roofs, with unprotected sides and edges 6 feet or more above lower levels, with a guardrail systems, safety net systems, personal fall arrest systems, or a combination of warning line systems and guardrail system, warning line system and safety net system, or warning line system and personal fall arrest system, or warning line system and safety monitoring system:

The employer does not ensure employees are protected from falls at an approximate height of 11 feet. This occurred on or about June 29, 2011, and times prior thereto, at 3701 Holmes Rd Houston, TX, where employees were on a roof with a slope of 3:12, exposing employees to fall hazards.

Pursuant to 29 C.F.R. 1903.19, within 10 days of the abatement date of this citation, the employer must submit documentation showing compliance with the standard, including describing the steps that it is taking to ensure that employees are protected from fall hazards.

Date By Which Violation Must be Abated:	01/10/2012
Proposed Penalty:	\$ 7000.00



Citation and Notification of Penalty

Company Name: Piping Technology & Products, Inc.
Inspection Site: 3701 Holmes, Houston, TX 77051

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

29 CFR 1926.503(a)(1): The employer did not provide a training program for each employee who might be exposed to fall hazards that enabled each employee to recognize the hazards of falling and trained each employee in the procedures to be followed in order to minimize these hazards:

The employer does not provide a training program for each employee when working an approximate height of 11 feet. This occurred on or about June 29, 2011, and times prior thereto, at 3701 Holmes Rd Houston, TX, exposing employees to fall hazards.

Pursuant to 29 C.F.R. 1903.19, within 10 days of the abatement date of this citation, the employer must submit documentation showing compliance with the standard, including describing the steps that it is taking to ensure that fall protection training is provided to each employee that might be exposed to fall hazards.

Date By Which Violation Must be Abated: 01/10/2012
Proposed Penalty: \$ 5000.00

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

29 CFR 1926.1053(b)(13): The top or step of a stepladder was used as a step:

The employer does not ensure the top of stepladders are not used as steps. This occurred on or about June 29, 2011, and times prior thereto, at 3701 Holmes Rd Houston, TX, exposing employees to fall hazards.

Pursuant to 29 C.F.R. 1903.19, within 10 days of the abatement date of this citation, the employer must submit documentation showing compliance with the standard, including describing the steps that it is taking to ensure that the top steps of stepladders are not used.

Date By Which Violation Must be Abated: 01/10/2012
Proposed Penalty: \$ 4000.00

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: Piping Technology & Products, Inc.
Inspection Site: 3701 Holmes, Houston, TX 77051

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

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:

The employer does not ensure that energy control procedures are developed, documented, and utilized for the control of hazardous energy on machinery, at 3701 Holmes Rd Houston, TX. This was observed on or about June 29, 2011, and times prior thereto, in the roll department, maintenance was performed on the Montgomery Large Roll Machine without specific energy control procedures, exposing employees to struck-by and caught-in hazards.

Pursuant to 29 C.F.R. 1903.19, within 10 days of the abatement date of this citation, the employer must submit documentation showing that it is in compliance with the standard, including describing the steps that it is taking to ensure that energy control procedures are developed, documented and utilized for the control of hazardous energy on all machinery.

Date By Which Violation Must be Abated: 01/10/2012
Proposed Penalty: \$ 70000.00



Citation and Notification of Penalty

Company Name: Piping Technology & Products, Inc.
Inspection Site: 3701 Holmes, Houston, TX 77051

Citation 2 Item 2 Type of Violation: **Willful**

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:

The employer does not ensure that energy control procedures are developed, documented, and utilized for the control of hazardous energy on machinery, at 3701 Holmes Rd Houston, TX. This was observed on or about August 10, 2011, and times prior thereto, in the Constants Department, maintenance was being performed on a Cincinnati Bickford Drill Press, Model #M1005. 3303, without any specific energy control procedures, exposing employees to struck-by hazards.

Pursuant to 29 C.F.R. 1903.19, within 10 days of the abatement date of this citation, the employer must submit documentation showing that it is in compliance with the standard, including describing the steps that it is taking to ensure that energy control procedures are developed, documented and utilized for the control of hazardous energy on all machinery.

Date By Which Violation Must be Abated: 01/10/2012
Proposed Penalty: \$ 70000.00



Citation and Notification of Penalty

Company Name: Piping Technology & Products, Inc.
Inspection Site: 3701 Holmes, Houston, TX 77051

Citation 2 Item 3 Type of Violation: **Willful**

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:

The employer does not ensure that energy control procedures are developed, documented, and utilized for the control of hazardous energy on machinery, at 3701 Holmes Rd Houston, TX. This was observed on or about August 31, 2011, in the cut shop, the cleaning of MG Industries Eye Burner #2 was performed without a procedure to control hazardous energy, exposing employees to caught-in hazards.

Pursuant to 29 C.F.R. 1903.19, within 10 days of the abatement date of this citation, the employer must submit documentation showing that it is in compliance with the standard, including describing the steps that it is taking to ensure that energy control procedures are developed, documented and utilized for the control of hazardous energy on all machinery.

Date By Which Violation Must be Abated: 01/10/2012
Proposed Penalty: \$ 70000.00



Citation and Notification of Penalty

Company Name: Piping Technology & Products, Inc.
Inspection Site: 3701 Holmes, Houston, TX 77051

Citation 2 Item 4 Type of Violation: **Willful**

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:

The employer does not ensure that energy control procedures are developed, documented, and utilized for the control of hazardous energy on machinery, at 3701 Holmes Rd Houston, TX. This was observed on August 31, 2011, in the press department, when upper die bolts of Large Hydraulic Press #1 were not adequately supported, and hydraulic pressure was not released, no energy control procedures were developed or implemented, exposing employees to struck-by hazards.

Pursuant to 29 C.F.R. 1903.19, within 10 days of the abatement date of this citation, the employer must submit documentation showing that it is in compliance with the standard, including describing the steps that it is taking to ensure that energy control procedures are developed, documented and utilized for the control of hazardous energy on all machinery.

Date By Which Violation Must be Abated: 01/10/2012
Proposed Penalty: \$ 70000.00



Citation and Notification of Penalty

Company Name: Piping Technology & Products, Inc.
Inspection Site: 3701 Holmes, Houston, TX 77051

Citation 2 Item 5 Type of Violation: **Willful**

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:

The employer does not ensure that energy control procedures are developed, documented, and utilized for the control of hazardous energy on machinery, at 3701 Holmes Rd Houston, TX. This occurred on or about September 15, 2011, in the cut shop area where maintenance was being performed without energy control procedures on a Piranha Punch Press #2, exposing employees to struck-by and caught-in hazards.

Pursuant to 29 C.F.R. 1903.19, within 10 days of the abatement date of this citation, the employer must submit documentation showing that it is in compliance with the standard, including describing the steps that it is taking to ensure that energy control procedures are developed, documented and utilized for the control of hazardous energy on all machinery.

Date By Which Violation Must be Abated: 01/10/2012
Proposed Penalty: \$ 70000.00



Citation and Notification of Penalty

Company Name: Piping Technology & Products, Inc.
Inspection Site: 3701 Holmes, Houston, TX 77051

Citation 2 Item 6 Type of Violation: **Willful**

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:

The employer does not ensure that energy control procedures are developed, documented, and utilized for the control of hazardous energy on machinery, at 3701 Holmes Rd Houston, TX. This was observed on or about October 3, 2011, in the cut shop department where maintenance was being performed by installing a guard on a Marvel Series B Mark II Band Saw # 4 without utilizing energy control procedures, exposing an employee to struck by hazards.

Pursuant to 29 C.F.R. 1903.19, within 10 days of the abatement date of this citation, the employer must submit documentation showing that it is in compliance with the standard, including describing the steps that it is taking to ensure that energy control procedures are developed, documented and utilized for the control of hazardous energy on all machinery.

Date By Which Violation Must be Abated: 01/10/2012
Proposed Penalty: \$ 70000.00



Citation and Notification of Penalty

Company Name: Piping Technology & Products, Inc.
Inspection Site: 3701 Holmes, Houston, TX 77051

Citation 2 Item 7 Type of Violation: **Willful**

29 CFR 1910.212(a)(3)(ii): Point(s) of operation of machinery were not guarded to prevent employee(s) from having any part of their body in the danger zone(s) during operating cycle(s):

The employer does not ensure that points of operation of machinery are guarded to prevent employees from having any part of their body in the danger zone during operation. This was observed on June 29, 2011, and times prior thereto, in the cut shop area the point of operation of a HYD MECH Band Saw (#1) was not guarded to prevent employees from having any part of their body in the danger zone, exposing employees to the hazards of amputation.

Pursuant to 29 C.F.R. 1903.19, within 10 days of the abatement date of this citation, the employer must submit documentation showing compliance with the standard, including describing the steps that it is taking to ensure that all points of operation of machinery are guarded.

Date By Which Violation Must be Abated: 01/04/2012
Proposed Penalty: \$ 70000.00



Citation and Notification of Penalty

Company Name: Piping Technology & Products, Inc.
Inspection Site: 3701 Holmes, Houston, TX 77051

Citation 2 Item 8 Type of Violation: **Willful**

29 CFR 1910.212(a)(3)(ii): Point(s) of operation of machinery were not guarded to prevent employee(s) from having any part of their body in the danger zone(s) during operating cycle(s):

The employer does not ensure that points of operation of machinery are guarded to prevent employees from having any part of their body in the danger zone during operation. This was observed on June 29, 2011, and times prior thereto, in the cut shop area the point of operation of a Marvel Band Saw, MODEL#: 81A/M3M/M9, Serial No: D-1212 (#4) was not guarded to prevent employees from having any part of their body in the danger zone, exposing employees to the hazards of amputations. The guide attached to the guard did not adjust to guard the point of operation, exposing employees to an opening of approximately 6 inches.

Pursuant to 29 C.F.R. 1903.19, within 10 days of the abatement date of this citation, the employer must submit documentation showing compliance with the standard, including describing the steps that it is taking to ensure that all points of operation on machinery are guarded.

Date By Which Violation Must be Abated: 01/04/2012
Proposed Penalty: \$ 70000.00



Citation and Notification of Penalty

Company Name: Piping Technology & Products, Inc.
Inspection Site: 3701 Holmes, Houston, TX 77051

Citation 2 Item 9 Type of Violation: **Willful**

29 CFR 1910.212(a)(3)(ii): Point(s) of operation of machinery were not guarded to prevent employee(s) from having any part of their body in the danger zone(s) during operating cycle(s):

The employer does not ensure that points of operation of machinery are guarded to prevent employees from having any part of their body in the danger zone during operation. This was observed on June 29, 2011, and times prior thereto, in the cut shop area the point of operation of a Marvel Band Saw, MODEL#: Series B Mark II (#3) was not guarded to prevent employees from having any part of their body in the danger zone, exposing the employees to the hazards of amputations. The guide attached to the guard did not adjust to guard the point of operation exposing the employee to an opening of approximately 5 inches.

Pursuant to 29 C.F.R. 1903.19, within 10 days of the abatement date of this citation, the employer must submit documentation showing compliance with the standard, including describing the steps that it is taking to ensure that all points of operation of machinery are guarded.

Date By Which Violation Must be Abated: 01/04/2012
Proposed Penalty: \$ 70000.00



Citation and Notification of Penalty

Company Name: Piping Technology & Products, Inc.
Inspection Site: 3701 Holmes, Houston, TX 77051

Citation 2 Item 10 Type of Violation: **Willful**

29 CFR 1910.212(a)(3)(ii): Point(s) of operation of machinery were not guarded to prevent employee(s) from having any part of their body in the danger zone(s) during operating cycle(s):

The employer does not ensure that points of operation of machinery are guarded to prevent employees from having any part of their body in the danger zone during operation. This was observed on August 10, 2011, and times prior thereto, in the east side bellows department the point of operation of a Marvel Band Saw, MODEL#: Series 75, was not guarded to prevent employees from having any part of their body in the danger zone, exposing employees to hazards of amputations. The guide attached to the guard did not adjust to guard the point of operation exposing the employee to an opening of approximately 11 inches.

Pursuant to 29 C.F.R. 1903.19, within 10 days of the abatement date of this citation, the employer must submit documentation showing compliance with the standard, including describing the steps that it is taking to ensure that all points of operation of machinery are guarded.

Date By Which Violation Must be Abated: 01/04/2012
Proposed Penalty: \$ 70000.00



Citation and Notification of Penalty

Company Name: Piping Technology & Products, Inc.
Inspection Site: 3701 Holmes, Houston, TX 77051

Citation 2 Item 11 Type of Violation: **Willful**

29 CFR 1910.212(a)(3)(ii): Point(s) of operation of machinery were not guarded to prevent employee(s) from having any part of their body in the danger zone(s) during operating cycle(s):

The employer does not ensure that points of operation of machinery are guarded to prevent employees from having any part of their body in the danger zone during operation. This was observed on August 10, 2011, and times prior thereto, in the hot shoe department the point of operation of a W.F WELLS & Sons, MODEL#: F-15 Series was not guarded to prevent employees from having any part of their body in the danger zone, exposing employees to the hazards of amputations. The operator was observed placing his hands next to the unguarded blade.

Pursuant to 29 C.F.R. 1903.19, within 10 days of the abatement date of this citation, the employer must submit documentation showing compliance with the standard, including describing the steps that it is taking to ensure that all points of operation of machinery are guarded.

Date By Which Violation Must be Abated: 01/04/2012
Proposed Penalty: \$ 70000.00



Citation and Notification of Penalty

Company Name: Piping Technology & Products, Inc.
Inspection Site: 3701 Holmes, Houston, TX 77051

Citation 2 Item 12 Type of Violation: **Willful**

29 CFR 1910.212(a)(3)(ii): Point(s) of operation of machinery were not guarded to prevent employee(s) from having any part of their body in the danger zone(s) during operating cycle(s):

The employer does not ensure that points of operation of machinery are guarded to prevent employees from having any part of their body in the danger zone during operation. This was observed on August 10, 2011, and times prior thereto, in the hot shoe department the point of operation of a 36 inch Northfield Band Saw, MODEL#: 5236D, was not guarded to prevent employees from having any part of their body in the danger zone, exposing employees to the hazards of amputations.

Pursuant to 29 C.F.R. 1903.19, within 10 days of the abatement date of this citation, the employer must submit documentation showing compliance with the standard, including describing the steps that it is taking to ensure that all points of operation of machinery are guarded.

Date By Which Violation Must be Abated: 01/04/2012
Proposed Penalty: \$ 70000.00



Citation and Notification of Penalty

Company Name: Piping Technology & Products, Inc.
Inspection Site: 3701 Holmes, Houston, TX 77051

Citation 2 Item 13 Type of Violation: **Willful**

29 CFR 1910.212(a)(3)(ii): Point(s) of operation of machinery were not guarded to prevent employee(s) from having any part of their body in the danger zone(s) during operating cycle(s):

The employer does not ensure that points of operation of machinery are guarded to prevent employees from having any part of their body in the danger zone during operation. This was observed on August 10, 2011, and times prior thereto, in the small and fast department the point of operation of a Doall Horizontal Band Saw, Model # C.916, Serial # 438.85.899 was not guarded to prevent employees from having any part of their body in the danger zone, exposing employees to hazards of amputations.

Pursuant to 29 C.F.R. 1903.19, within 10 days of the abatement date of this citation, the employer must submit documentation showing compliance with the standard, including describing the steps that it is taking to ensure that all points of operation of machinery are guarded.

Date By Which Violation Must be Abated: 01/04/2012
Proposed Penalty: \$ 70000.00



MARK R. BRIGGS
Area Director

U.S. Department of Labor
Occupational Safety and Health Administration
Houston South Area Office
17625 El Camino Real, Suite 400
Houston, TX 77058
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INVOICE/ DEBT COLLECTION NOTICE

Company Name: Piping Technology & Products, Inc.
Inspection Site: 3701 Holmes, Houston, TX 77051
Issuance Date: 12/28/2011

Summary of Penalties for Inspection Number 312928344

Citation 1, Serious	= \$	103000.00
Citation 2, Willful	= \$	910000.00
TOTAL PROPOSED PENALTIES	= \$	1013000.00

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 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.

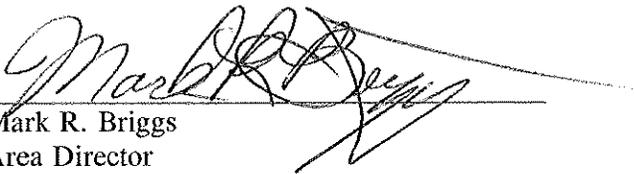
Pursuant to the Debt Collection Act of 1982 (Public Law 97-365) and regulations of the U.S. Department of Labor (29 CFR Part 20), the Occupational Safety and Health Administration is required to assess interest, delinquent charges, and administrative costs for the collection of delinquent penalty debts 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 4%. 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.



Mark R. Briggs
Area Director



Date