



Citation and Notification of Penalty

Company Name: Quest Specialty Coatings, LLC

Inspection Site: N92 W14701 Anthony Avenue, Menomonee Falls, WI 53051

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

29 CFR 1910.119(e)(3)(i): The process hazard analysis did not address the hazards of the process.

- (a) The process hazard analysis did not consider combustible dust hazard(s) associated with blending operations; specifically the addition of powdered material into blending processes and potential explosion/deflagration hazards associated with local exhaust dust collection system.

ABATEMENT DOCUMENTATION REQUIRED FOR THIS ITEM

Date By Which Violation Must be Abated:

12/05/2014

Proposed Penalty:

\$7000.00



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

1910.119(g)(3) Training documentation: The employer did not ascertain that each employee involved in operating a process has received and understood the training required by this paragraph. The employer shall prepare a record which contains the identity of the employee, the date of training, and the means used to verify that the employee understood the training:

- (a) Operator training for covered processes associated with the highly hazardous flammable liquids, resins and gases was not documented to support that each employee involved in operating a process had an understanding of the process equipment, operating procedures, how to run each operating phase, operating limits, safety and health considerations and safety systems and their functions.

ABATEMENT DOCUMENTATION REQUIRED FOR THIS ITEM

Date By Which Violation Must be Abated:	12/05/2014
Proposed Penalty:	\$5500.00



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Company Name: Quest Specialty Coatings, LLC

Inspection Site: N92 W14701 Anthony Avenue, Menomonee Falls, WI 53051

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

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

Mechanical Integrity procedures were not developed for each type of processing equipment associated with the manufacturing of paint products using highly hazardous flammable liquids, resins, powders and propellant gas.

- (a) Mechanical Integrity procedures were not developed for each type of "Fire Control valve" associated with the manufacturing of paint products using highly hazardous flammable liquids, resins, powders and propellant gas, but are not limited to, blending processes, milling processes and aerosol paint container filling processes.
- (b) Mechanical Integrity procedures were not developed for each type of "Corken Bypass valve" associated with the manufacturing of paint products using highly hazardous flammable liquids, resins, powders and propellant gas, but are not limited to, blending processes, milling processes and aerosol paint container filling processes.
- (c) Mechanical Integrity procedures were not developed for each type of "Fisher Backpressure Regulator / Relief Valve" associated with the manufacturing of paint products using highly hazardous flammable liquids, resins, powders and propellant gas, but is not limited to, blending processes, milling processes and aerosol paint container filling processes.
- (d) Mechanical Integrity procedures were not developed for each type of "Emergency Shutoff valve" associated with the manufacturing of paint products using highly hazardous flammable liquids, resins, powders and propellant gas, but are not limited to, blending processes, milling processes and aerosol paint container filling processes.
- (e) Mechanical Integrity procedures were not developed for each type of "valve" associated with the manufacturing of paint products using highly hazardous flammable liquids, resins, powders and propellant gas, but are not limited to, blending processes, milling processes and aerosol paint container filling processes.

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- (f) Mechanical Integrity procedures were not developed for each type of “Torit Dust Collector” associated with the manufacturing of paint products using highly hazardous flammable liquids, resins, powders and propellant gas, but are not limited to, blending processes, milling processes and aerosol paint container filling processes.
- (g) Mechanical Integrity procedures were not developed for each type of “Ammonia Dispensing Cart” associated with the manufacturing of paint products using highly hazardous flammable liquids, resins, powders and propellant gas, but are not limited to, blending processes, milling processes and aerosol paint container filling processes.
- (h) Mechanical Integrity procedures were not developed for each type of “Dedos Dispensing System” associated with the manufacturing of paint products using highly hazardous flammable liquids, resins, powders and propellant gas, but are not limited to, blending processes, milling processes and aerosol paint container filling processes.
- (i) Mechanical Integrity procedures were not developed for each type of “Quick Hit Rack System” associated with the manufacturing of paint products using highly hazardous flammable liquids, resins, powders and propellant gas, but are not limited to, blending processes, milling processes and aerosol paint container filling processes.

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Inspection Site: N92 W14701 Anthony Avenue, Menomonee Falls, WI 53051

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

29 CFR 1910.119(j)(3): The employer did not train each employee involved in maintaining the on-going integrity of process equipment in the procedures applicable to the employee's job tasks to ensure that the employee can perform the job tasks in a safe manner:

- (a) Maintenance employees tasked with or associated with conducting or managing maintenance, repair and replacement of the highly hazardous flammable liquids, resins and gas covered processes were not trained on the mechanical integrity procedure and procedures applicable to performing job tasks safely. Procedures applicable to ensuring the on-going integrity of process equipment include, but are not limited to the mechanical integrity procedure, line breaking procedure, inspection of fire control valves, inspection of emergency shut off valves, use and calibration of the combustible gas meter, and inspection of grounding and bonding cables.

ABATEMENT DOCUMENTATION REQUIRED FOR THIS ITEM

Date By Which Violation Must be Abated:

12/05/2014

Proposed Penalty:

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Citation 1 Item 5 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:

- (a) An annual/periodic inspection of the energy control procedures has not been conducted for equipment and processes such as, but not limited to blenders, tint base mill, basket mill, ammonia dispensing processes, distillation process, gas house filling processes, and compressed air generation and distribution system. The periodic inspection is to ensure that procedures and requirements of the standard are being followed and that employees who implement energy control procedures understand their application.

ABATEMENT DOCUMENTATION REQUIRED FOR THIS ITEM

Date By Which Violation Must be Abated:

12/05/2014

Proposed Penalty:

\$5500.00



Citation and Notification of Penalty

Company Name: Quest Specialty Coatings, LLC

Inspection Site: N92 W14701 Anthony Avenue, Menomonee Falls, WI 53051

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

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

29 CFR 1910.119(j)(4)(i): Inspections and tests are not performed on process equipment.

The employer does not protect employees from chemical process hazards associated with the highly hazardous flammable liquids, resins and propellant gases by performing necessary mechanical integrity inspections and tests on covered process equipment listed in 29 CFR 1910.119(J)(1)(i)-(vi):

- (a) On or about April 19, 2014: Inspections and tests are not being performed on emergency fire control valves (FCVs) installed on piping systems that transfer solvents, resins and finished paint products to manufacturing operations associated with but not limited to blending operations, milling operations, distillation operations, and container filling operations. Emergency fire control valves were not being inspected and tested to ensure that valves were free of corrosion, fusible links were intact, and the valve would close without restriction.
- (b) On or about April 19, 2014: Corken Bypass Valve inspections and tests are not being performed on bypass valves associated with paint manufacturing processes that transfer propellant gases through pipe systems. Bypass valves were not being inspected and tested to assess wear of external and internal valve components.
- (c) On or about April 19, 2014: Fisher Backpressure Regulator / Relief Valve inspections and tests are not being performed on Backpressure and Relief Valves associated with paint manufacturing processes that transfer propellant gases through pipe systems. Backpressure Regulator / Relief Valves were not being inspected and tested to assess relief valve parts such as O-rings, gaskets, diaphragms, orifice and valve plugs. The manufacturer advises to periodically inspect the valve(s) according to the severity of service conditions and other recognized engineering practices. The inspection requirements are to disassemble the valve to inspect internal components for damage.

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: 975139
Inspection Date(s): 05/01/2014 -
Issuance Date: 10/17/2014



Citation and Notification of Penalty

Company Name: Quest Specialty Coatings, LLC
Inspection Site: N92 W14701 Anthony Avenue, Menomonee Falls, WI 53051

- (d) On or about April 19, 2014: Dust Collection System inspections and tests are not being performed on local exhaust dust collection system associated with blending operations. Fitness-for-service testing is not being performed to assess static pressure/capture velocity and grounding of the system.

Quest Specialty Coating, LLC was previously cited for a violation of this occupational safety and health standard or its equivalent standards 1910.119(j)(4)(i) and (ii) under inspection number 540838, citation 01, items 004b and 004c, issued on December 10th, 2012, and was affirmed as final order on or about January 7, 2013, with respect to a workplace located at N92W14701 Anthony Avenue, Menomonee Falls, Wisconsin 53051.

ABATEMENT DOCUMENTATION REQUIRED FOR THIS ITEM

Date By Which Violation Must be Abated:	12/05/2014
Proposed Penalty:	\$70000.00

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Citation and Notification of Penalty

Company Name: Quest Specialty Coatings, LLC

Inspection Site: N92 W14701 Anthony Avenue, Menomonee Falls, WI 53051

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

29 CFR 1910.119(j)(4)(ii): Inspection and testing procedures do not follow recognized and generally accepted good engineering practices:

The employer does not protect employees from chemical process hazards associated with the highly hazardous flammable liquids and propellant gases by performing mechanical integrity inspections and tests on covered process equipment consistent with recognized and generally accepted good engineering practices:

- (a) On or about April 19, 2014: Pump Inspections and testing is not being performed on pumps associated with paint manufacturing operations including, but not limited to blending operations, aerosol paint container filling operations, solvent and resin transfer from storage tanks and propellant gas transfer processes from propellant storage vessels. The manufacturers advise for such inspection and testing on a periodic basis and to establish a preventive maintenance and repair schedule based upon operational failure history and type of fluid processed through the pump.
- (b) On or about April 19, 2014: Pump Motor inspections and testing is not being performed on pump motors associated with paint manufacturing operations including, but not limited to blending operations, aerosol paint container filling operations, solvent and resin transfer from storage tanks and propellant gas transfer processes from propellant storage vessels. The manufacturers advise for such inspection and testing on a periodic basis and to establish a preventive maintenance and repair schedule based upon operational failure history. The manufacturer also specifies that the pump motors be greased on a six month schedule.

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

Inspection Number: 975139
Inspection Date(s): 05/01/2014 -
Issuance Date: 10/17/2014



Citation and Notification of Penalty

Company Name: Quest Specialty Coatings, LLC
Inspection Site: N92 W14701 Anthony Avenue, Menomonee Falls, WI 53051

Quest Specialty Coating, LLC was previously cited for a violation of this occupational safety and health standard or its equivalent standards 1910.119(j)(4)(i) and (ii) under inspection number 540838, citation 01, items 004b and 004c, issued on December 10th, 2012, and was affirmed as final order on or about January 7, 2013, with respect to a workplace located at N92W14701 Anthony Avenue, Menomonee Falls, Wisconsin 53051.

ABATEMENT DOCUMENTATION REQUIRED FOR THIS ITEM

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

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

29 CFR 1910.119(d)(3)(i): The employer does not compile information pertaining to the equipment in the process to include the elements under 29 CFR 1910.119(d)(3)(i)[a]-[h]:

The employer does not protect employees from chemical process hazards associated with highly hazardous flammable liquids and propellant gases by the compiling of process safety information consistent with 29 CFR 1910.119(d)(3)(i)[a]-[h]:

- (a) On or about April 19, 2014: Piping and instrument diagrams (P&IDs) are not accurate, complete, and up-to-date for covered process equipment associated with piping systems that transfer solvents, resins, propellant gases and finished paint products to manufacturing and container filling operations associated with but not limited to blending operations, distillation process, propellant gas transfer and solvent and propellant tank storage.
1. Distillation P&IDs do not include associated process system components such as, but not limited to, fire control valve (FCV) installed upstream of hand ball valve T16-HBV-02 on tank 16 and vapor temperature gage on distillation vessel T16-DT-01. Additionally, piping associated with reclaim storage tank 17 was not accurate.
 2. Distillation P&ID identifies that ball valve T16-HBV-01 with hose connection on tank 16 is to be locked in a closed position. The valve was observed not locked out in the closed position.
 3. Propellant Tank Storage P&IDs do not include associated process system components such as, but not limited to Fisher Backpressure Regulator/Relief Valves and Corken bypass valves on tank 12, 13, 14 and 15 installed as pressure regulators and relief devices associated with transfer pumps and motors.

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4. P&IDs do not include an accurate corresponding legend for determination of valve type, piping type, control system components, alarms system components, etc.
- (b) On or about April 19, 2014, information pertaining to design codes and standards employed is not compiled for covered process equipment associated with the distillation process. Specifically, but not limited to design of fired heater shutdown and safety interlock control instrumentation for the distillation process.
- (c) On or about April 19, 2014, information pertaining to design codes and standards employed is not compiled for covered process equipment associated with the dust collection system.

Quest Specialty Coatings, LLC was previously cited for a violation of this occupational safety and health standard or its equivalent standard 1910.119(d)(3)(i) under inspection number 540838, citation 01, item 001a, issued on December 10th, 2012, and was affirmed as final order on or about January 7, 2013, with respect to a workplace located at N92W14701 Anthony Avenue, Menomonee Falls, Wisconsin 53051.

ABATEMENT DOCUMENTATION REQUIRED FOR THIS ITEM

Date By Which Violation Must be Abated:	12/05/2014
Proposed Penalty:	\$15400.00



Citation and Notification of Penalty

Company Name: Quest Specialty Coatings, LLC
Inspection Site: N92 W14701 Anthony Avenue, Menomonee Falls, WI 53051

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

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

The employer does not protect employees from chemical process hazards associated with highly hazardous flammable liquids and propellant gases by documenting that covered process equipment complies with recognized and generally accepted good engineering practices (RAGAGEP):

- (a) The employer does not document that the reclaim distillation process for used solvent purification complies with RAGAGEP.
- (b) The employer does not document that the dust collection system used on blenders and mills complies with RAGAGEP.

Quest Specialty Coatings, LLC was previously cited for a violation of this occupational safety and health standard or its equivalent standard 1910.119(d)(3)(ii) under inspection number 540838, citation 01, item 001b, issued on December 10th, 2012, and was affirmed as final order on or about January 7, 2013, with respect to a workplace located at N92W14701 Anthony Avenue, Menomonee Falls, Wisconsin 53051.

ABATEMENT DOCUMENTATION REQUIRED FOR THIS ITEM

Date By Which Violation Must be Abated: 12/05/2014



Citation and Notification of Penalty

Company Name: Quest Specialty Coatings, LLC
Inspection Site: N92 W14701 Anthony Avenue, Menomonee Falls, WI 53051

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

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.

The employer does not protect employees from chemical process hazards associated with the highly hazardous flammable liquids, resins and propellant gas by developing and implementing clear, comprehensive written operating procedures focused on safely conducting activities:

- (a) Operating procedures are not developed to account for all of the activities involved in setting up and running the production processes associated with the manufacturing of paints and coatings using, but not limited to flammable solvents, resins, propellant gases and powders. Activities (phases) not addressed include, but are not limited to: addition of powdered and solid material batch ingredients involved in the various blending and milling processes; calibration of portable gas meter; and floor cleaning processes.

Quest Specialty Coatings, LLC was previously cited for a violation of this occupational safety and health standard or its equivalent standard 1910.119(f)(1) under inspection number 540838, citation 01, item 003, issued on December 10th, 2012, and was affirmed as final order on or about January 7, 2013, with respect to a workplace located at N92W14701 Anthony Avenue, Menomonee Falls, Wisconsin 53051.

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A handwritten signature in black ink, appearing to read "Christine Zortman".

Christine Zortman
Area Director

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