

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

Inspection Number: 1091956  
Inspection Date(s): 09/15/2015 - 12/11/2015  
Issuance Date: 02/19/2016



**Citation and Notification of Penalty**

**Company Name:** Budney Overhaul & Repair, Ltd.  
**Inspection Site:** 131 New Park Drive, Berlin, CT 06037

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

29 CFR 1910.37(a)(2): Exit routes were not arranged so that employees did not have to travel toward a high hazard area:

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**PAINTING**

On, or about, October 20, 3015, a metal waste can full of rags impregnated with flammable materials such as, but not limited to, isopropyl alcohol, was stored within one foot of a designated exit.

Date By Which Violation Must be Abated:  
Proposed Penalty:

Corrected During Inspection  
\$2525.00

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

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

29 CFR 1910.107(g)(3): Residue scrapings and debris contaminated with residue were not immediately removed from the premises and properly disposed. Approved metal waste cans were not provided wherever rags or waste were impregnated with finishing material; and all such rags or waste were not deposited therein immediately after use. The contents of waste cans were not properly disposed of at least once daily or at the end of each shift:

**PAINTING**

On, or about October 20, 2015, the contents of a metal waste can full of rags contaminated with flammable materials such as, but not limited to, isopropyl alcohol, were not disposed of daily. The can was stored near the egress for the painting area and had been there for approximately one week.

**ABATEMENT DOCUMENTATION REQUIRED FOR THIS ITEM**

**Date By Which Violation Must be Abated:**

**04/06/2016**

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:** Budney Overhaul & Repair, Ltd.  
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Citation 1 Item 2 Type of Violation: **Serious**

29 CFR 1910.106(e)(6)(i): Adequate precautions were not taken to prevent the ignition of flammable vapors:

PAINTING

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On, or about, October 20, 2015, employees dispensed Anticissing Application Thinner, a Class 3, flammable thinner from a 5 liter metal container into a metal cleaning vessel on cardboard lined metal cart. The container, the cleaning vessel and the cart were not grounded. The thinner contained butyl acetate and had a flashpoint of 77 degrees Fahrenheit.

**ABATEMENT DOCUMENTATION REQUIRED FOR THIS ITEM**

Date By Which Violation Must be Abated:	04/06/2016
Proposed Penalty:	\$3366.00

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**Company Name:** Budney Overhaul & Repair, Ltd.  
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**Citation 1 Item 3** Type of Violation: **Serious**

29 CFR 1910.107(b)(5)(ii): Discarded filter pads and filter rolls were not immediately removed to a safe, well-detached location or placed in a water-filled metal container and disposed of at the close of the day's operation when not maintained completely in water:

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**PAINT ROOM**

On, or about, October 20, 2015, discarded spray booth filters, contaminated with Rockhard Chromate primer, a flammable chemical with a flashpoint of 79 degrees F, was stored inside the paint room, in a waterless metal container, for longer than one day.

Date By Which Violation Must be Abated:  
Proposed Penalty:

Corrected During Inspection  
\$3366.00

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

29 CFR 1910.107(c)(2): An open flame or spark producing equipment was present in the spraying area or within 20 feet thereof and not separated by a partition:

**PAINTING**

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On, or about, October 20, 2015, an employee coating parts with flammable coatings used spark producing tools, including, but not limited to:

- 1) A hammer, with a metal head, used to closed containers of flammable coating material.
- 2) A metal paint pot opener, used to open containers of flammable spray coating material.
- 3) A metal, flat head screw driver, used to pry open flammable spray coating material.

**ABATEMENT DOCUMENTATION REQUIRED FOR THIS ITEM**

Date By Which Violation Must be Abated:	04/06/2016
Proposed Penalty:	\$3366.00

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

29 CFR 1910.132(d)(1): The employer did not assess the workplace to determine if hazards were present, or were likely to be present, which necessitated the use of personal protective equipment:

PAINTING

On, or about, September 15, 2015, the employer failed to require that a painter who worked with chemicals such as, but not limited to, Rockhard Chromate Primer, which contained hexavalent chromium, a carcinogen, wear protective clothing, such as, but not limited to, Tyvek coveralls while applying the coating.

Date By Which Violation Must be Abated:  
Proposed Penalty:

04/06/2016  
\$4208.00

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

29 CFR 1910.1026(h)(1): A hazard was present or was likely to be present from skin or eye contact with chromium (VI); however, the employer did not provide appropriate personal protective clothing and equipment at no cost to employees, and/or did not ensure that employees used such clothing and equipment:

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**PAINTING**

On, or about, September 15, 2015, the employer failed to assess work operations for personal protective equipment requirements when performing painting operations involving Rockhard Chromate Primer, which contains hexavalent chromium, a carcinogen. A painter who was monitored and was found to be overexposed to hexavalent chromium was not provided with and required to wear full-body protective clothing.

Date By Which Violation Must be Abated:

04/06/2016

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

29 CFR 1910.151(b): First aid supplies approved by a consulting physician were not readily available:

ASSEMBLY

On, or about, September 15, 2015, the employer failed to provide an approved antidote for hydrofluoric acid skin absorption, such as, but not limited to zephiran chloride, when employees worked with Alodine 1201, a corrosive chemical with a pH of less than 2.0, which contained hydrofluoric acid.

**ABATEMENT DOCUMENTATION REQUIRED FOR THIS ITEM**

Date By Which Violation Must be Abated:	04/06/2016
Proposed Penalty:	\$4208.00

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**Citation and Notification of Penalty**

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

29 CFR 1910.1026(c): Employees were exposed to an airborne concentration of chromium (VI) which exceeded 5 micrograms per cubic meter of air, as an 8-hour time-weighted average:

**PAINTING**

On, or about, October 10, 2015, a painter was over exposed to chromium (VI) at an 8-hour Time Weighted Average (TWA) of 25.53 micrograms per cubic meter of air, which is 5.106 times the permissible exposure limit of 5.0 micrograms per cubic meter of air, while spray coating aircraft parts with Rockhard Chromate Primer. Monitoring was done for 275 minutes of the employees shift. Zero exposure was assumed for the 205 minutes not sampled.

**ABATEMENT DOCUMENTATION REQUIRED FOR THIS ITEM**

Date By Which Violation Must be Abated:	04/06/2016
Proposed Penalty:	\$4208.00

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**Citation and Notification of Penalty**

**Company Name:** Budney Overhaul & Repair, Ltd.  
**Inspection Site:** 131 New Park Drive, Berlin, CT 06037

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

29 CFR 1910.1026(d)(1): The employer with a workplace or work operation covered by this standard did not determine the 8-hour time-weighted average exposure for each employee exposed to chromium (VI):

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PAINTING  
ASSEMBLY

On, or about, September 15, 2015, the employer had not conducted initial monitoring to determine the 8-hour time-weighted average exposure for each employee exposed to chromium (VI) when employees:

- a) worked with Rockhard Chromate Primer as a coating in painting and,
- b) worked with zinc chromate to prepare parts in assembly.

Date By Which Violation Must be Abated:

04/06/2016

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**Citation and Notification of Penalty**

**Company Name:** Budney Overhaul & Repair, Ltd.  
**Inspection Site:** 131 New Park Drive, Berlin, CT 06037

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

29 CFR 1910.1026(f)(1)(i): Feasible engineering controls and work practices were not instituted to reduce and maintain employee exposures to chromium (VI) at or below the permissible exposure limit:

**PAINTING**

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On, or about October 10, 2015, feasible engineering controls and work practices were not instituted to reduce and maintain employee exposure to chromium (VI) at, or below the permissible exposure limit when a painter was over exposed to chromium (VI) at an 8-hour Time-Weighted Average (TWA) of 25.53 micrograms per cubic meter of air, which is 5.106 times the permissible exposure limit of 5.0 micrograms per cubic meter, while spray coating aircraft parts with Rockhard Chromate Primer. Monitoring was done for 275 minutes of the employees shift. Zero exposure was assumed for the 205 minutes not sampled.

Feasible abatement may include insuring coating activities are done completely within the spray booths.

**ABATEMENT DOCUMENTATION REQUIRED FOR THIS ITEM**

Date By Which Violation Must be Abated:

04/06/2016

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

29 CFR 1910.1026(e)(1): The employer did not establish a regulated area wherever an employee's exposure to airborne concentrations of chromium (VI) was, or could reasonably be expected to be, in excess of the permissible exposure limit:

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**PAINTING**

On, or about, October 10, 2015, the employer failed to establish a regulated area when an employee that was spray coating with Rockhard Chromate Primer was exposed to chromium (VI) at 5.106 times the permissible exposure limit of 5.0 micrograms per cubic meter of air over an 8 hour time-weighted average.

**ABATEMENT DOCUMENTATION REQUIRED FOR THIS ITEM**

Date By Which Violation Must be Abated:	04/06/2016
Proposed Penalty:	\$4208.00

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

29 CFR 1910.1026(h)(2)(i): The employer did not ensure that employees removed all protective clothing and equipment contaminated with chromium (VI) at the end of the work shift or at the completion of their tasks involving chromium (VI) exposure, whichever came first:

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**PAINTING**

On, or about, September 15, 2015, the employer failed to ensure that employee clothing contaminated with chromium (VI) from spray coating aircraft parts with Rockhard Chromate Primer, was removed at the end of the work shift.

**ABATEMENT DOCUMENTATION REQUIRED FOR THIS ITEM**

Date By Which Violation Must be Abated:	04/06/2016
Proposed Penalty:	\$4208.00

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

29 CFR 1910.1026(i)(4)(ii): Employees were allowed to consume food or beverages at a worksite where chromium (VI) was present; however, the employer did not ensure that employees did not enter the eating and drinking areas with chromium (VI)-contaminated protective clothing or equipment:

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**PAINTING**

On, or about, September 15, 2015, the employer failed to require that painters who worked with chemicals such as, but not limited to, Rockhard Chromate Primer, which contained hexavalent chromium, a carcinogen, did not enter eating and drinking areas with chromium (VI)-contaminated clothing.

**ABATEMENT DOCUMENTATION REQUIRED FOR THIS ITEM**

Date By Which Violation Must be Abated: 04/06/2016  
Proposed Penalty: \$4208.00

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**Company Name:** Budney Overhaul & Repair, Ltd.  
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**Citation 1 Item 11** Type of Violation: **Serious**

29 CFR 1910.1026(k)(1)(i)(A): The employer did not make medical surveillance available for all employees who were or could be occupationally exposed to chromium (VI) at or above the action level for 30 or more days a year:

**PAINTING**

On, or about, October 10, 2015, the employer did not make medical surveillance available to employees that spray coated parts with Rockhard Chromate Primer and were exposed to, or could be occupationally exposed to chromium (VI) at or above the action level for 30 or more days a year.

**ABATEMENT DOCUMENTATION REQUIRED FOR THIS ITEM**

Date By Which Violation Must be Abated:	04/06/2016
Proposed Penalty:	\$4208.00

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

29 CFR 1910.1026(l)(1): The employer did not ensure that all employees who were assigned to workplaces where there was exposure to chromium (VI) were provided with information and training as required by the Hazard Communication Standard 29 CFR 1910.1200:

PAINTING  
ASSEMBLY

On, or about, September 15, 2015, employees exposed to chromium (VI) were not provided training on the health hazards of the chemical when employees performed the following activities:

- a) worked with Rockhard Chromate Primer as a coating in painting and,
- b) worked with zinc chromate to prepare parts in assembly.

Date By Which Violation Must be Abated:  
Proposed Penalty:

04/06/2016  
\$4208.00



**Citation and Notification of Penalty**

**Company Name:** Budney Overhaul & Repair, Ltd.  
**Inspection Site:** 131 New Park Drive, Berlin, CT 06037

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

29 CFR 1910.1026(l)(1)(iii): The employer had not included chromium (VI) in the hazard communication program, established to comply with the Hazard Communication Standard, 29 CFR 1910.1200, ensured that each employee had access to labels on containers of chromium (VI) and to safety data sheets, and was trained in accordance with the requirements of the Hazard Communication Standard and 29 CFR 1910.1026(l)(2), including the contents of the Hexavalent Chromium Standard, the purpose and a description of the medical surveillance program, and made copies of this standard available to all affected employees:

**FACILITY**

On or about September, 15, 2015, employees that worked with chemicals containing chromium (VI), such as, but not limited to Rockhard Chromate Primer, Chrome Pickle Solution, and Alodine 1201, had not been trained on the following:

1. The health hazards associated with chromium (VI) exposure;
2. The location, manner of use and release of chromium (VI);
3. Engineering controls and work practices associated with the employee's job assignment;
4. Emergency procedures; and
5. Measures employees were to take to protect themselves; and
6. The purpose and description of the medical surveillance program.

**ABATEMENT DOCUMENTATION REQUIRED FOR THIS ITEM**

**Date By Which Violation Must be Abated:**

**04/06/2016**

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

29 CFR 1910.1026(l)(2)(ii): The employer did not make a copy of the Chromium (VI) standard, 29 CFR 1910.1026, readily available to all employees who were exposed to chromium (VI):

**FACILITY**

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On, or about, September, 15, 2015, the employer failed to ensure that employees required to work with chemicals containing chromium (VI), such as, but not limited to Rockhard Chromate Primer, Chrome Pickle Solution, and Alodine 1201 had a copy of the hexavalent chromium standard readily available to all employees.

Date By Which Violation Must be Abated:

04/06/2016

A handwritten signature in black ink, appearing to read "Warren G. Simpson", is written over a horizontal line.

Warren G. Simpson  
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  
William Cotter Federal Building  
135 High Street, Suite 361  
Hartford, CT 06103  
Phone: 860-240-3152 Fax: 860-240-3155



## INVOICE / DEBT COLLECTION NOTICE

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**Company Name:** Budney Overhaul & Repair, Ltd.  
**Inspection Site:** 131 New Park Drive, Berlin, CT 06037  
**Issuance Date:** 02/19/2016

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<b>Summary of Penalties for Inspection Number</b>	<b>1091956</b>
<b>Citation 1, Serious</b>	<b>\$46287.00</b>
<b>TOTAL PROPOSED PENALTIES</b>	<b>\$46287.00</b>

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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. You can also make your payment electronically on [www.pay.gov](http://www.pay.gov). On the left side of the pay.gov homepage, you will see an option to Search Public Forms. Type "OSHA" and click Go. From the results, click on **OSHA Penalty Payment Form**. The direct link is <https://www.pay.gov/paygov/forms/formInstance.html?agencyFormId=53090334>. You will be required to enter your inspection number when making the payment. Payments can be made by credit card or Automated Clearing House (ACH) using your banking information. Payments of \$25,000 or more require a Transaction ID, and also must be paid using ACH. If you require a Transaction ID, please contact the OSHA Debt Collection Team at (202) 693-2170.

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

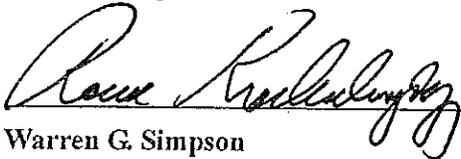
If a personal check is issued, it will be converted into an electronic fund transfer (EFT). This means that our bank will copy your check and use the account information on it to electronically debit your account for the amount of the check. The debit from your account will then usually occur within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



Warren G. Simpson  
Area Director

2/19/16

Date