

**U.S. Department of Labor** Occupational Safety and Health Administration  
17625 El Camino Real  
Suite 400  
Houston, TX 77058



06/21/2024

Qualawash Holdings, LLC, dba Quala Services, LLC  
and its successors  
11110 Highway 225  
La Porte, TX 77571

Dear Employer:

Enclosed you will find citations for violations of the Occupational Safety and Health Act of 1970 (the Act) which may have accompanying proposed penalties. The OSHA publication "Employer Rights and Responsibilities Following an OSHA Inspection", is available by scanning the QR code below with your smartphone or barcode scanner.

**English – OSHA 3000 Rev 2018**



[OSHA 3000](#)

**Spanish – OSHA 3195 Rev 2019**



[OSHA 3195](#)

If you have any questions about the enclosed citations and penalties, I would welcome further discussions in person or by telephone. Please contact me at (281) 286-0583.

You will note that, for violations which you do not contest, you must (1) notify this office promptly by letter that you have taken appropriate corrective action within the time set forth on the citation; and (2) pay any penalties assessed. Please inform me 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. This information will allow us to close the case.

You may also request an informal conference with me during the 15-working-day notice of contest period. During such an informal conference you may present any evidence or views which you believe would support an adjustment to the citation or the penalty.

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 the citation. The total time of this contest period is not interrupted by having an informal conference.

If you decide to request an informal conference, please complete the attached notice at the bottom of this letter and post it next to the Citations as soon as the time, date and the place of the informal conference have been determined. Be sure to bring to the conference with you any and all supporting documentation of existing

conditions as well as of 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.

You should be aware that OSHA publishes information on its inspection and citation activity on the Internet under the provisions of Electronic Freedom of Information Act. The information related to these alleged violations will be posted when our system indicates that you have received this citation. You are encouraged to review the information concerning your establishment at [www.osha.gov](http://www.osha.gov). If you have any dispute with the accuracy of the information displayed, please contact this office.

Sincerely,



**Larissa Ipsen, M.S.**  
Area Director

Enclosures

## NOTICE TO EMPLOYEES

The law gives you and your representative the opportunity to object to any abatement date set for a violation if you believe the date to be unreasonable. Any contest of the abatement dates of the citations referred to in paragraph 1 of this Settlement Agreement must be mailed to the address below within 15 working days (excluding weekends and Federal Holidays) of the receipt by the Employer of the original citations:

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

**U.S. Department of Labor**  
Occupational Safety and Health Administration  
17625 El Camino Real  
Suite 400  
Houston, TX 77058



## Citation and Notification of Penalty

**To:**  
Qualawash Holdings, LLC, dba Quala Services, LLC  
and its successors  
11110 Highway 225  
La Porte, TX 77571

**Inspection Number:** 1718657  
**Inspection Date(s):** 12/24/2023 - 04/04/2024  
**Issuance Date:** 06/21/2024

**Inspection Site:**  
11110 Highway 225  
La Porte, TX 77571

*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 either call to schedule an informal conference (see paragraph below) or** you mail a notice of contest to the U.S. Department of Labor Area Office at the address shown above. 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.

**Employer Rights and Responsibilities** – The OSHA publication “Employer Rights and Responsibilities Following an OSHA Inspection”, is available by scanning the QR code below with your smartphone or barcode scanner. You may also access the document by clicking on the link or typing it into your browser to take you directly to OSHA's webpage.

## English – OSHA 3000 Rev 2018



[OSHA 3000](#)

## Spanish – OSHA 3195 Rev 2019



[OSHA 3195](#)

**Posting** - The law requires that a copy of this Citation and Notification of Penalty be posted immediately in a prominent place at or near the location of the violation(s) cited herein, or, if it is not practicable because of the nature of the employer's operations, where it will be readily observable by all affected employees. This Citation must remain posted until the violation(s) cited herein has (have) been abated, or for 3 working days (excluding weekends and Federal holidays), whichever is longer.

**Informal Conference** - An informal conference is not required. However, if you wish to have such a conference you may request one with the Area Director during the 15 working day contest period by calling (281) 286-0583. During such an informal conference, you may present any evidence or views which you believe would support an adjustment to the citation(s) and/or penalty(ies).

If you are considering a request for an informal conference to discuss any issues related to this Citation and Notification of Penalty, you must take care to schedule it early enough to allow time to contest after the informal conference, should you decide to do so. Please keep in mind that a written letter of intent to contest must be submitted to the Area Director within 15 working days of your receipt of this Citation. The running of this contest period is not interrupted by an informal conference.

If you decide to request an informal conference, please complete, remove and post the Notice to Employees next to this Citation and Notification of Penalty as soon as the time, date, and place of the informal conference have been determined. Be sure to bring to the conference any and all supporting documentation of existing conditions as well as any abatement steps taken thus far. If conditions warrant, we can enter into an informal settlement agreement which amicably resolves this matter without litigation or contest.

**Right to Contest** – You have the right to contest this Citation and Notification of Penalty. You may contest all citation items or only individual items. You may also contest proposed penalties and/or abatement dates without contesting the underlying violations. **Unless you inform the Area Director in writing that you intend to contest the citation(s) and/or proposed penalty(ies) within 15 working days after receipt, the citation(s) and the proposed penalty(ies) will become a final order of the Occupational Safety and Health Review Commission and may not be reviewed by any court or agency.**

**Penalty Payment** – Penalties are due within 15 working days of receipt of this notification unless contested. The QR codes on the previous page link to the OSHA publication “Employer Rights and Responsibilities Following an OSHA Inspection”. Additional information concerning the Debt Collection Act of 1982 can be found in the Debt Collection Notice (the last two pages of this document). Make your check or money order payable to “DOL-OSHA”. Please indicate the Inspection Number on the remittance.

You may also make your payment electronically. Scan the QR code below with your smartphone or barcode scanner to be directed to the pay.gov website. You may also go to the pay.gov website by clicking on the link.



### [Pay.gov - OSHA Payments](#)

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 process the payments as if these restrictions or conditions do not exist.

**Notification of Corrective Action** – For each violation which you do not contest, you must provide *abatement certification* to the Area Director of the OSHA office issuing the citation and identified above. This abatement certification is to be provided by letter within 10 calendar days after each abatement date. Abatement certification includes the date and method of abatement. If the citation indicates that the violation was corrected during the inspection, no abatement certification is required for that item. The abatement certification letter must be posted at the location where the violation appeared and the corrective action took place or employees must otherwise be effectively informed about abatement activities. A sample abatement certification letter is enclosed with this Citation. In addition, where the citation indicates that *abatement documentation* is necessary, evidence of the purchase or repair of equipment, photographs or video, receipts, training records, etc., verifying that abatement has occurred is required to be provided to the Area Director. For an electronic copy of the sample abatement certification letter, or to submit abatement electronically, scan the QR code below with your smartphone or barcode scanner to be taken to the OSHA abatement website.



### [Certification of Abatement](#)

**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.

**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.

**Employer Rights and Responsibilities** – The enclosed booklet (OSHA 3000) outlines additional employer rights and responsibilities and should be read in conjunction with this notification.

**Notice to Employees** – The law gives an employee or his/her representative the opportunity to object to any abatement date set for a violation if he/she believes the date to be unreasonable. The contest must be mailed to the U.S. Department of Labor Area Office at the address shown above and postmarked within 15 working days (excluding weekends and Federal holidays) of the receipt by the employer of this Citation and Notification of Penalty.

**Inspection Activity Data** – You should be aware that OSHA publishes information on its inspection and citation activity on the Internet under the provisions of the Electronic Freedom of Information Act. The information related to these alleged violations will be posted when our system indicates that you have received this citation. You are encouraged to review the information concerning your establishment at [www.osha.gov](http://www.osha.gov). If you have any dispute with the accuracy of the information displayed, please contact this office.



## NOTICE TO EMPLOYEES OF INFORMAL CONFERENCE

An informal conference has been scheduled with OSHA to discuss the citation(s) issued on

06/21/2024. The conference will be held by telephone or at the OSHA office located at 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.



**CERTIFICATION OF CORRECTIVE ACTION WORKSHEET**



**Certification of Abatement**

**Inspection Number: 1718657**

Company Name: Qualawash Holdings, LLC, dba Quala Services, LLC  
Inspection Site: 11110 Highway 225, La Porte, TX 77571  
Issuance Date: 06/21/2024

List the specific method of correction for each item on this citation in this package that does not read "Corrected During Inspection" and return to: **U.S. Department of Labor – Occupational Safety and Health Administration, 17625 El Camino Real, Suite 400, Houston, TX 77058.**

Citation Number \_\_\_\_\_ and Item Number \_\_\_\_\_ was corrected on \_\_\_\_\_  
By (Method of Abatement): \_\_\_\_\_

Citation Number \_\_\_\_\_ and Item Number \_\_\_\_\_ was corrected on \_\_\_\_\_  
By (Method of Abatement): \_\_\_\_\_

Citation Number \_\_\_\_\_ and Item Number \_\_\_\_\_ was corrected on \_\_\_\_\_  
By (Method of Abatement): \_\_\_\_\_

Citation Number \_\_\_\_\_ and Item Number \_\_\_\_\_ was corrected on \_\_\_\_\_  
By (Method of Abatement): \_\_\_\_\_

I certify that the information contained in this document is accurate and that the affected employees and their representatives have been informed of the abatement.

\_\_\_\_\_  
Signature

\_\_\_\_\_  
Date

\_\_\_\_\_  
Typed or Printed Name

\_\_\_\_\_  
Title

**NOTE: 29 USC 666(g)** whoever knowingly makes any false statements, representation or certification in any application, record, plan or other documents filed or required to be maintained pursuant to the Act shall, upon conviction, be punished by a fine of not more than \$10,000 or by imprisonment of not more than 6 months or both.

**POSTING:** A copy of completed Corrective Action Worksheet should be posted for employee review

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

**Inspection Number:** 1718657  
**Inspection Date(s):** 12/24/2023 - 04/04/2024  
**Issuance Date:** 06/21/2024



**Citation and Notification of Penalty**

**Company Name:** Qualawash Holdings, LLC, dba Quala Services, LLC  
**Inspection Site:** 11110 Highway 225, La Porte, TX 77571

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

29 CFR 1910.146(d)(1): Under the permit-required confined space program required by 29 CFR 1910.146(c)(4), the employer did not implement the measures necessary to prevent unauthorized entry:

a) At Bay 4 of the facility, on or about December 23, 2023, the employer did not implement the measures necessary to prevent unauthorized entry to Tank T-21048, exposing employees to explosion, inhalation, and asphyxiation hazards.

**ABATEMENT DOCUMENTATION REQUIRED FOR THIS ITEM**

Date By Which Violation Must be Abated:	Corrected During Inspection
Proposed Penalty:	\$16,131.00

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:** Qualawash Holdings, LLC, dba Quala Services, LLC  
**Inspection Site:** 11110 Highway 225, La Porte, TX 77571

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

29 CFR 1910.146(d)(6): Under the permit-required confined space program required by 29 CFR 1910.146(c)(4), the employer did not provide at least one attendant outside the permit space into which entry was authorized for the duration of entry operations:

- a) At the wash bay areas, on or about December 23, 2023, where an attendant was not provided for employees entering Tank 702696, exposing employees to explosion, inhalation, and asphyxiation hazards.
- b) At the wash bay areas, on or about December 23, 2023, where an attendant was not provided for employees entering Tank T-21012, exposing employees to explosion and asphyxiation hazards.
- c) At the wash bay areas, on or about December 23, 2023, where an attendant was not provided for employees entering Tank TIFU350268-6, exposing employees to explosion and asphyxiation hazards.
- d) At the wash bay areas, on or about December 23, 2023, where an attendant was not provided for employees entering Tank 10299528, exposing employees to explosion and asphyxiation hazards.
- e) At the wash bay areas, on or about December 23, 2023, where an attendant was not provided for employees entering Tank 6080, exposing employees to explosion, inhalation, and asphyxiation hazards.
- f) At the wash bay areas, on or about December 23, 2023, where an attendant was not provided for employees entering Tank 1013, exposing employees to explosion, inhalation, and asphyxiation hazards.
- g) At the wash bay areas, on or about December 23, 2023, where an attendant was not provided for employees entering Tank T-15122, exposing employees to explosion and asphyxiation hazards.
- h) At the wash bay areas, on or about December 23, 2023, where an attendant was not provided for employees entering Tank 65868, exposing employees to inhalation and asphyxiation hazards.
- i) At the wash bay areas, on or about December 22, 2023, where an attendant was not provided for employees entering Tank 749, exposing employees to inhalation and asphyxiation hazards.

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:** 1718657  
**Inspection Date(s):** 12/24/2023 - 04/04/2024  
**Issuance Date:** 06/21/2024



**Citation and Notification of Penalty**

**Company Name:** Qualawash Holdings, LLC, dba Quala Services, LLC  
**Inspection Site:** 11110 Highway 225, La Porte, TX 77571

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**ABATEMENT DOCUMENTATION REQUIRED FOR THIS ITEM**

Date By Which Violation Must be Abated:	Corrected During Inspection
Proposed Penalty:	\$16,131.00

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:** Qualawash Holdings, LLC, dba Quala Services, LLC  
**Inspection Site:** 11110 Highway 225, La Porte, TX 77571

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

29 CFR 1910.146(e)(1): Before entry was authorized, the employer did not document the completion of measures required by 29 CFR 1910.146(d)(3) by preparing an entry permit:

- a) At the wash bay areas, on or about December 22, 2023, the employer did not document the completion of measures required for safe permit space entry. Entry permits were not completed prior to entering the Tank 25019. Employees were exposed to atmospheric and explosion hazards.
- b) At the wash bay areas, on or about December 22, 2023, the employer did not document the completion of measures required for safe permit space entry. Entry permits were not completed prior to entering the Tank 734. Employees were exposed to atmospheric and explosion hazards.
- c) At the wash bay areas, on or about December 22, 2023, the employer did not document the completion of measures required for safe permit space entry. Entry permits were not completed prior to entering the Tank 719. Employees were exposed to atmospheric and explosion hazards.
- d) At the wash bay areas, on or about December 22, 2023, the employer did not document the completion of measures required for safe permit space entry. Entry permits were not completed prior to entering the Tank 6177LD. Employees were exposed to atmospheric and explosion hazards.

Date By Which Violation Must be Abated:  
Proposed Penalty:

Corrected During Inspection  
\$16,131.00

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

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

**Inspection Number:** 1718657  
**Inspection Date(s):** 12/24/2023 - 04/04/2024  
**Issuance Date:** 06/21/2024



**Citation and Notification of Penalty**

**Company Name:** Qualawash Holdings, LLC, dba Quala Services, LLC  
**Inspection Site:** 11110 Highway 225, La Porte, TX 77571

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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 4 a** Type of Violation: **Serious**

29 CFR 1910.146(f)(3): The entry permit that documented compliance and authorized entry to a permit space did not identify the authorized duration of the entry permit:

a) At the wash bay areas, on or about December 23, 2023, where the entry permit for Tank 702696 did not identify the authorized duration of entry, exposing employees to explosion and inhalation hazards.

Date By Which Violation Must be Abated:  
Proposed Penalty:

Corrected During Inspection  
\$16,131.00

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

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

**Inspection Number:** 1718657  
**Inspection Date(s):** 12/24/2023 - 04/04/2024  
**Issuance Date:** 06/21/2024



**Citation and Notification of Penalty**

**Company Name:** Qualawash Holdings, LLC, dba Quala Services, LLC  
**Inspection Site:** 11110 Highway 225, La Porte, TX 77571

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

29 CFR 1910.146(f)(5): The entry permit that documented compliance and authorized entry to a permit space did not identify the personnel, by name, currently serving as attendants:

a) At the wash bay areas, on or about December 23, 2023, where the entry permit for tank 702696 did not identify the personnel, by name, serving as attendants, exposing employees to explosion and inhalation hazards.

Date By Which Violation Must be Abated:  
Proposed Penalty:

Corrected During Inspection  
\$0.00

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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**Issuance Date:** 06/21/2024



**Citation and Notification of Penalty**

**Company Name:** Qualawash Holdings, LLC, dba Quala Services, LLC  
**Inspection Site:** 11110 Highway 225, La Porte, TX 77571

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

29 CFR 1910.146(f)(7): The entry permit that documented compliance and authorized entry to a permit space did not identify the hazards of the permit space to be entered:

a) At the wash bay areas, on or about December 23, 2023, where the entry permit for tank 702696 did not identify the hazards of the permit space, exposing employees to explosion and inhalation hazards.

Date By Which Violation Must be Abated:  
Proposed Penalty:

Corrected During Inspection  
\$0.00

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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**Issuance Date:** 06/21/2024



**Citation and Notification of Penalty**

**Company Name:** Qualawash Holdings, LLC, dba Quala Services, LLC  
**Inspection Site:** 11110 Highway 225, La Porte, TX 77571

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

29 CFR 1910.146(f)(11): The entry permit that documented compliance and authorized entry to a permit space did not identify the rescue and emergency services to be summoned and the means for summoning those services:

a) At the wash bay areas, on or about December 23, 2023, where the entry permit for tank 702696 did not identify the rescue and emergency services to be summoned and the means for summoning those services.

Date By Which Violation Must be Abated:  
Proposed Penalty:

Corrected During Inspection  
\$0.00

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

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

**Inspection Number:** 1718657  
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**Citation and Notification of Penalty**

**Company Name:** Qualawash Holdings, LLC, dba Quala Services, LLC  
**Inspection Site:** 11110 Highway 225, La Porte, TX 77571

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

29 CFR 1910.146(f)(13): The entry permit that documented compliance and authorized entry to a permit space did not identify equipment, such as personal protective equipment, testing equipment, communications equipment, alarm systems, and rescue equipment.

a) At the wash bay areas, on or about December 23, 2023, where the entry permit for tank 702696 did not identify equipment, such as personal protective equipment, communications equipment, alarm systems, and rescue equipment, exposing employees to explosion and inhalation hazards.

Date By Which Violation Must be Abated:  
Proposed Penalty:

Corrected During Inspection  
\$0.00

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

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

**Inspection Number:** 1718657  
**Inspection Date(s):** 12/24/2023 - 04/04/2024  
**Issuance Date:** 06/21/2024



**Citation and Notification of Penalty**

**Company Name:** Qualawash Holdings, LLC, dba Quala Services, LLC  
**Inspection Site:** 11110 Highway 225, La Porte, TX 77571

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

29 CFR 1910.305(b)(1)(i): Conductors entering cutout boxes, cabinets, or fittings were not protected from abrasions:

a) At Bay 4 of the facility, on or about December 23, 2023, where conductors entering an electrical panel box for the pressure washer were not protected from abrasions, exposing employees to electrical hazards.

Date By Which Violation Must be Abated:  
Proposed Penalty:

June 27, 2024  
\$12,676.00

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

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

**Inspection Number:** 1718657  
**Inspection Date(s):** 12/24/2023 - 04/04/2024  
**Issuance Date:** 06/21/2024



**Citation and Notification of Penalty**

**Company Name:** Qualawash Holdings, LLC, dba Quala Services, LLC  
**Inspection Site:** 11110 Highway 225, La Porte, TX 77571

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

29 CFR 1910.305(b)(2)(i): Each outlet box in completed installations did not have a cover, faceplate, or fixture canopy:

a) At Bay 4 of the facility, on or about December 23, 2023, an outlet was missing a cover plate, exposing employees to electrical hazards.

Date By Which Violation Must be Abated:  
Proposed Penalty:

June 27, 2024  
\$7,604.00

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

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

**Inspection Number:** 1718657  
**Inspection Date(s):** 12/24/2023 - 04/04/2024  
**Issuance Date:** 06/21/2024



**Citation and Notification of Penalty**

**Company Name:** Qualawash Holdings, LLC, dba Quala Services, LLC  
**Inspection Site:** 11110 Highway 225, La Porte, TX 77571

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

29 CFR 1910.1000(a)(2): Employee(s) were exposed to an airborne concentration of carbon monoxide listed in Table Z-1 in excess of the 8 hour Time Weighted Average concentration of 50 parts per million (ppm):

a) At Bay 4 of the facility, on or about December 23, 2023, where a tank washer performing cleaning operations inside tank T-21048 was exposed to carbon monoxide concentrations at an 8 hour time weighted average (TWA) of 234.5 ppm.

**ABATEMENT DOCUMENTATION REQUIRED FOR THIS ITEM**

Date By Which Violation Must be Abated:  
Proposed Penalty:

July 18, 2024  
\$16,131.00

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:** Qualawash Holdings, LLC, dba Quala Services, LLC  
**Inspection Site:** 11110 Highway 225, La Porte, TX 77571

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

29 CFR 1910.146(d)(5)(i): The employer did not test conditions in the permit space to determine if acceptable entry conditions existed before entry was authorized:

a) At the wash bay areas, on or about December 23, 2023, the employer did not ensure that the tank washer conducted testing for acceptable permit space entry conditions prior to entering the Tank 702696 for post-wash inspection. The employee was exposed to explosion, inhalation and asphyxiation hazards.

Qualawash Holdings, LLC. was previously cited for a violation of this occupational safety and health standard, which was contained in OSHA inspection number 1453365, citation number 1, item number 3, and was affirmed as a final order on February 8, 2021, with respect to a workplace located at 5100 Underwood Road, Pasadena, Texas.

**ABATEMENT DOCUMENTATION REQUIRED FOR THIS ITEM**

Date By Which Violation Must be Abated:  
Proposed Penalty:

July 18, 2024  
\$88,721.00

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:** Qualawash Holdings, LLC, dba Quala Services, LLC  
**Inspection Site:** 11110 Highway 225, La Porte, TX 77571

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Citation 2 Item 2 Type of Violation: **Repeat - Serious**

29 CFR 1910.146(d)(5)(i): The employer did not test conditions in the permit space to determine if acceptable entry conditions existed before entry was authorized:

a) At the wash bay areas, on or about December 23, 2023, the employer did not ensure that the tank washer conducted testing for acceptable permit space entry conditions prior to entering the Tank 6080 for post-wash inspection. The employee was exposed to explosion, inhalation and asphyxiation hazards.

Qualawash Holdings, LLC. was previously cited for a violation of this occupational safety and health standard, which was contained in OSHA inspection number 1453365, citation number 1, item number 3, and was affirmed as a final order on February 8, 2021, with respect to a workplace located at 5100 Underwood Road, Pasadena, Texas.

**ABATEMENT DOCUMENTATION REQUIRED FOR THIS ITEM**

Date By Which Violation Must be Abated:  
Proposed Penalty:

July 18, 2024  
\$88,721.00

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:** Qualawash Holdings, LLC, dba Quala Services, LLC  
**Inspection Site:** 11110 Highway 225, La Porte, TX 77571

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

29 CFR 1910.146(d)(5)(i): The employer did not test conditions in the permit space to determine if acceptable entry conditions existed before entry was authorized:

a) At the wash bay areas, on or about December 23, 2023, the employer did not ensure that the tank washer conducted testing for acceptable permit space entry conditions prior to entering the Tank 25019 for post-wash inspection. The employee was exposed to explosion, inhalation and asphyxiation hazards.

Qualawash Holdings, LLC. was previously cited for a violation of this occupational safety and health standard, which was contained in OSHA inspection number 1453365, citation number 1, item number 3, and was affirmed as a final order on February 8, 2021, with respect to a workplace located at 5100 Underwood Road, Pasadena, Texas.

**ABATEMENT DOCUMENTATION REQUIRED FOR THIS ITEM**

Date By Which Violation Must be Abated:  
Proposed Penalty:

July 18, 2024  
\$88,721.00

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:** Qualawash Holdings, LLC, dba Quala Services, LLC  
**Inspection Site:** 11110 Highway 225, La Porte, TX 77571

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Citation 2 Item 4    Type of Violation: **Repeat - Serious**

29 CFR 1910.146(d)(5)(i): The employer did not test conditions in the permit space to determine if acceptable entry conditions existed before entry was authorized:

a) At the wash bay areas, on or about December 23, 2023, the employer did not ensure that the tank washer conducted testing for acceptable permit space entry conditions prior to entering the Tank 734 for post-wash inspection. The employee was exposed to explosion, inhalation and asphyxiation hazards.

Qualawash Holdings, LLC. was previously cited for a violation of this occupational safety and health standard, which was contained in OSHA inspection number 1453365, citation number 1, item number 3, and was affirmed as a final order on February 8, 2021, with respect to a workplace located at 5100 Underwood Road, Pasadena, Texas.

**ABATEMENT DOCUMENTATION REQUIRED FOR THIS ITEM**

Date By Which Violation Must be Abated:  
Proposed Penalty:

July 18, 2024  
\$88,721.00

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:** Qualawash Holdings, LLC, dba Quala Services, LLC  
**Inspection Site:** 11110 Highway 225, La Porte, TX 77571

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Citation 2 Item 5 Type of Violation: **Repeat - Serious**

29 CFR 1910.146(d)(5)(i): The employer did not test conditions in the permit space to determine if acceptable entry conditions existed before entry was authorized:

a) At the wash bay areas, on or about December 23, 2023, the employer did not ensure that the tank washer conducted testing for acceptable permit space entry conditions prior to entering the Tank 719 for post-wash inspection. The employee was exposed to explosion, inhalation and asphyxiation hazards.

Qualawash Holdings, LLC. was previously cited for a violation of this occupational safety and health standard, which was contained in OSHA inspection number 1453365, citation number 1, item number 3, and was affirmed as a final order on February 8, 2021, with respect to a workplace located at 5100 Underwood Road, Pasadena, Texas.

**ABATEMENT DOCUMENTATION REQUIRED FOR THIS ITEM**

Date By Which Violation Must be Abated:  
Proposed Penalty:

July 18, 2024  
\$88,721.00

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:** Qualawash Holdings, LLC, dba Quala Services, LLC  
**Inspection Site:** 11110 Highway 225, La Porte, TX 77571

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**Citation 2 Item 6** Type of Violation: **Repeat - Serious**

29 CFR 1910.146(d)(5)(i): The employer did not test conditions in the permit space to determine if acceptable entry conditions existed before entry was authorized:

a) At the wash bay areas, on or about December 23, 2023, the employer did not ensure that the tank washer conducted testing for acceptable permit space entry conditions prior to entering the Tank 6177LD for post-wash inspection. The employee was exposed to explosion, inhalation and asphyxiation hazards.

Qualawash Holdings, LLC. was previously cited for a violation of this occupational safety and health standard, which was contained in OSHA inspection number 1453365, citation number 1, item number 3, and was affirmed as a final order on February 8, 2021, with respect to a workplace located at 5100 Underwood Road, Pasadena, Texas.

**ABATEMENT DOCUMENTATION REQUIRED FOR THIS ITEM**

Date By Which Violation Must be Abated:  
Proposed Penalty:

July 18, 2024  
\$88,721.00

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:** Qualawash Holdings, LLC, dba Quala Services, LLC  
**Inspection Site:** 11110 Highway 225, La Porte, TX 77571

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Citation 2 Item 7 Type of Violation: **Repeat - Serious**

29 CFR 1910.146(j)(2): The employer did not ensure that each entry supervisor verified, by checking that the appropriate entries had been made on the permit, that all tests specified by the permit had been conducted and that all procedures and equipment specified by the permit were in place before endorsing the permit and allowing entry to begin:

a) At the wash bay areas, on or about December 23, 2023, Entry Supervisor #1 did not ensure that all tests specified by the permit had been conducted in Tank 1013 prior to endorsing the permit, exposing employees to explosion, asphyxiation and inhalation hazards.

Qualawash Holdings, LLC. was previously cited for a violation of this occupational safety and health standard, which was contained in OSHA inspection number 1453365, citation number 2, item number 1, and was affirmed as a final order on February 8, 2021, with respect to a workplace located at 5100 Underwood Road, Pasadena, Texas.

**ABATEMENT DOCUMENTATION REQUIRED FOR THIS ITEM**

Date By Which Violation Must be Abated:  
Proposed Penalty:

July 18, 2024  
\$88,721.00

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:** Qualawash Holdings, LLC, dba Quala Services, LLC  
**Inspection Site:** 11110 Highway 225, La Porte, TX 77571

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Citation 2 Item 8 Type of Violation: **Repeat - Serious**

29 CFR 1910.146(j)(2): The employer did not ensure that each entry supervisor verified, by checking that the appropriate entries had been made on the permit, that all tests specified by the permit had been conducted and that all procedures and equipment specified by the permit were in place before endorsing the permit and allowing entry to begin:

a) At the wash bay areas, on or about December 23, 2023, Entry Supervisor #2 did not ensure that all tests specified by the permit had been conducted in Tank TIFU350268-6 prior to endorsing the permit, exposing employees to explosion hazards.

Qualawash Holdings, LLC. was previously cited for a violation of this occupational safety and health standard, which was contained in OSHA inspection number 1453365, citation number 2, item number 1, and was affirmed as a final order on February 8, 2021, with respect to a workplace located at 5100 Underwood Road, Pasadena, Texas.

**ABATEMENT DOCUMENTATION REQUIRED FOR THIS ITEM**

Date By Which Violation Must be Abated:  
Proposed Penalty:

July 18, 2024  
\$88,721.00

*Larissa Ipsen*

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**Larissa Ipsen, M.S.**  
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  
17625 El Camino Real  
Suite 400  
Houston, TX 77058



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**INVOICE /  
DEBT COLLECTION NOTICE**

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**Company Name: Qualawash Holdings, LLC, dba Quala Services, LLC**  
**Inspection Site: 11110 Highway 225, La Porte, TX 77571**  
**Issuance Date: 06/21/2024**

**Summary of Penalties for Inspection Number: 1718657**

Citation 1 Item 1, Serious	\$16,131.00
Citation 1 Item 2, Serious	\$16,131.00
Citation 1 Item 3, Serious	\$16,131.00
Citation 1 Item 4a, Serious	\$16,131.00
Citation 1 Item 4b, Serious	\$0.00
Citation 1 Item 4c, Serious	\$0.00
Citation 1 Item 4d, Serious	\$0.00
Citation 1 Item 4e, Serious	\$0.00
Citation 1 Item 5, Serious	\$12,676.00
Citation 1 Item 6, Serious	\$7,604.00
Citation 1 Item 7, Serious	\$16,131.00
Citation 2 Item 1, Repeat - Serious	\$88,721.00
Citation 2 Item 2, Repeat - Serious	\$88,721.00
Citation 2 Item 3, Repeat - Serious	\$88,721.00
Citation 2 Item 4, Repeat - Serious	\$88,721.00
Citation 2 Item 5, Repeat - Serious	\$88,721.00
Citation 2 Item 6, Repeat - Serious	\$88,721.00
Citation 2 Item 7, Repeat - Serious	\$88,721.00
Citation 2 Item 8, Repeat - Serious	\$88,721.00

**TOTAL PROPOSED PENALTIES: \$810,703.00**

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.

You may also make your payment electronically. Scan the QR code below with your smartphone or barcode scanner to be directed to the pay.gov website. You may also go to the pay.gov website by clicking on the link.



### [Pav.gov - OSHA Payments](#)

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 two 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.

*Larissa Ipsen*

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06/21/2024

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**Larissa Ipsen, M.S.**

Date

Area Director