



Department of Energy
Richland Operations Office
P.O. Box 550
Richland, Washington 99352

APR 03 2015

15-ESQ-0054

Mr. E. Holbrook, Compliance Inspector
Nuclear Waste Program
State of Washington
Department of Ecology
3100 Port of Benton Boulevard
Richland, Washington 99354

Dear Mr. Holbrook:

RESPONSE TO STATE OF WASHINGTON, DEPARTMENT OF ECOLOGY (ECOLOGY)
NOTICE TO COMPLY DATED FEBRUARY 19, 2015, REGARDING PACIFIC
NORTHWEST NATIONAL LABORATORY (PNNL) 300 AREA GENERATOR
LOCATIONS

This letter is responding to your letter dated February 19, 2015, (15-NWP-038 Reissue) regarding the Notice to Comply listing six Violations and one Concern identified during the compliance inspection of October 29, 2014. The letter requested a response within 30 days of receipt of the letter. Since the Notice to Comply deals with activities at the Hanford Site, 300 Area, the U.S. Department of Energy Richland Operations Office (RL) is providing this response. This response includes the information requested in the Notice to Comply to close out the items cited as Violations, as well as a discussion of the Concern noted.

Action #1 (WAC 173-303-180[1]): "Within 30 days of receipt of this inspection report, reconcile uniform hazardous waste manifest discrepancies. When you return the enclosed Compliance Certificate, provide a copy of the original uniform hazardous waste manifest Number(s) 007857355 FLE, 007857356 FLE, and 009851955 JJK and full documentation of reconciliation."

Response #1: A corrected copy of the three manifests requested is enclosed, correctly reflecting the "site address" in Box 5, and a note was inserted in the Unit-Specific Operating Record explaining the change. Corrected manifest copies were also provided to the receiving facilities (Clean Harbors – Aragonite and the Environmental Restoration Disposal Facility at Hanford) on March 3, 2015. A briefing has been prepared for PNNL staff responsible for preparing manifests, reminding them of the requirement to show the correct physical address on the manifest, as well as the mailing address. This briefing has occurred.

Actions #2 (WAC 173-303-200[1][c]) and #3 (WAC 173-303-200[1][d]): No further action is required.

Response #2 and #3: These Observations were corrected on the spot during the inspection.

Action #4 (WAC 173-303-330[2][b]): "Within 30 days upon receipt of this inspection report, PNNL must list the written description of the type and amount of both introductory and continuing training required for the BED and building manager in the training plan, or incorporate into the written training plan, the specific locations of where the training requirements for these positions are located. When you return the enclosed Compliance Certificate, provide a copy of the changes to Ecology."

Response #4: PNNL staff discussed this issue with you on January 15, 2015, subsequent to the inspection, and provided documentation of the Building Emergency Director (BED) and Building Managers Training. As requested, the Environmental and Transportation Management and Operations Programs Training Requirements Document (part of the training plan) was revised on February 26, 2015, to include the specific course titles for the BED (copy enclosed). Note that the training for Building Managers is only included because PNNL typically assigns Building Managers as the primary BED for its 300 Area Facilities.

Action #5 (WAC 173-303-630[3]): "Immediately upon receipt of this inspection report, PNNL must conduct inspections of DW and Mixed Waste containers in accordance with WAC 173-303-630(3). The October 24, 2014, *90-day Accumulation Area Weekly Inspection Log* for 350D must indicate the correction regarding obscured labels. When you return the enclosed Compliance Certificate, provide a copy of the reconciled October 24, 2014, *90-Day Accumulation Area Weekly Inspection Log* for 350D to Ecology."

Response #5: Between February 20 and 24, 2015, PNNL performed inspections of all dangerous and mixed waste containers in 90-day areas and at the 325 Hazardous Waste Treatment Units to confirm conformance with WAC 173-303-630(3) regarding labeling and marking of containers. No nonconformances were noted. RL does not believe that making changes to the inspection form in the operating record is appropriate; see WAC 173-303-320(2)(d) and WAC 173-303-630(6), where the record of inspections is referred to as a "log" indicating Observations are to be recorded at the time noted. Instead, RL has prepared an errata sheet to attach to the inspection log containing the corrections noted in the Notice to Comply, and a copy of the errata sheet is enclosed. On October 29, 2014, the bag with the obscured label was placed in a drum with the correct accumulation date clearly marked, as noted on the errata sheet.

Action #6 (WAC 173-303-630[5][a]): No further action is required.

Response #6: This Observation was corrected on the spot during the inspection.

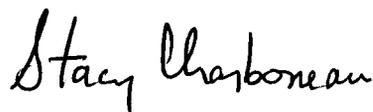
RL wishes to address the Concern Ecology indicated for compliance with WAC 173-303-200(1)(d) regarding major risk labeling at the 90-day area. RL has two issues with Ecology's stated Concern.

First, the U.S. Department of Transportation labeling system, including the Class 9 Label, is an effective major risk identification system for "safety of employees, emergency response personnel, and the public" and meets the requirement of WAC 173-303-200(1)(d). It is universally understood and accepted. This point is elaborated in the supplemental information recently requested by Ecology and provided by the Hanford Site, as a result of the inspection of the 214-T Facility. Please refer to that document for further information on this point.

Ecology also asserts that since the shipment was 13 days away from the date of inspection, the waste could not be staged for shipment and was simply continuing to be accumulated. Ecology's statement was that "Applicable risk labels must remain on the DW or MW containers until shipments have been confirmed." WAC 173-303 does not impose a time limit on how many days in advance of shipment a waste container may be staged for shipment. Further, what constitutes "confirmation" of shipment, which Ecology suggests as the time where one label is removed and a different one applied, is vague and operationally impracticable. Operation of waste accumulation under a 90-day clock requires a very efficient process, particularly at an accumulation area collecting waste from numerous laboratories. As laboratory-scale waste containers are packaged for transportation, those packages are staged for transportation. Since the distinctions referred to in the Concern regarding staging for shipment versus accumulation are not found in the Dangerous Waste Regulations, RL is uncertain as to how the observed practice constitutes a regulatory or safety Concern to Ecology. RL would be happy to discuss this matter with you further at your convenience.

If you have questions, please contact me, or your staff may contact Jeffrey A. Frey, Acting Assistant Manager for Safety and Environment, on (509) 376-7727.

Sincerely,



Stacy Charboneau
Manager

ESQ:ACM

Enclosures:

1. Uniform Hazardous Waste Manifests
(007857333 FLE, 007857356 FLE, and
009851955 JJK)
2. Building Manager/Building Emergency
Director/Delegate

cc w/encls: See page 4

Mr. E. Holbrook
15-ESQ-0054

-4-

APR 03 2015

cc w/encls:

C. M. Andersen, PNNL
D. B. Bartus, EPA
J. L. Boller, EPA
F. W. Bond, Ecology
D. A. Faulk, EPA
E. L. Grohs, PNNL
S. Hudson, HAB
T. M. McDermott, PNSO
K. Niles, ODOE
J. B. Price, Ecology
R. E. Snyder, PNSO
M. J. Stephenson, PNNL
H. T. Tilden, PNNL
Environmental Portal
HF Operating Record (J. K. Perry, MSA, H3-01)
PNNL Correspondence Control
TPA Administrative Record, 300 Area Facilities (H-0-7)

cc w/o encls:

G. Bohnee, NPT
S. Harris, CTUIR
R. Jim, YN
Ecology NWP Library

UNIFORM HAZARDOUS WASTE MANIFEST
 1. Generator ID Number: WA7600005007
 2. Page 1 of 2
 3. Emergency Response Phone: (800) 422-7348
 4. Manifest Tracking Number: 007857355 FLE

5. Generator's Name and Mailing Address
 US DOE Hanford Site
 US DOE Hanford Site PO Box 580
 Richland, WA 99354
 Generator's Site Address (if different than mailing address)
 SAME
 Life Sciences Laboratory - 1 (331 Building)
 331 Cypress Street / 100 Area
 Richland, WA 99354
 9/2/10

6. Transporter 1 Company Name: Clean Harbors Environmental Services Inc
 U.S. EPA ID Number: MA0029322250
 7. Transporter 2 Company Name: SECURED LAND TRANSPORT
 U.S. EPA ID Number: AZP000513770

8. Designated Facility Name and Site Address
 Clean Harbors Arizona LLC
 11800 North Aspen Road
 Chandler, AZ 85025
 U.S. EPA ID Number: UTD081552177

9a. HM	9b. U.S. DOT Description (including Proper Shipping Name, Hazard Class, ID Number, and Packing Group (if any))	10. Containers		11. Total Quantity	12. Unit WL/Vol.	13. Waste Codes	
		No.	Type				
X	UN1950, WASTE AEROSOLS (EACH NOT EXCEEDING 1 L CAPACITY), 2.1	001	DF	00005	P	D001	
X	UN1992, WASTE FLAMMABLE LIQUIDS, TOXIC, N.O.S., (MINERAL SPIRITS, TOLUENE), 3 (6.1), PG II	001	CF	00070	P	D001	U230
X	UN1993, WASTE FLAMMABLE LIQUIDS, N.O.S., (NONANE), 3, PG III	001	DF	00005	P	D001	
X	UN3125, WASTE WATER-REACTIVE SOLID, SELF-HEATING, N.O.S., 4.3 (4.2), PG II (with Sodium, Zinc Acetate)	001	DM	00005	P	D001	D002

14. Special Handling Instructions and Additional Information
 1. LCCRD
 2. LCCRD
 3. CH77374
 ERM126 LK5
 ERG131 LK20
 ERG133 LK3

15. GENERATOR'S CERTIFICATION: I, the undersigned, declare that the contents of this consignment are fully and accurately described above by the proper shipping name, and are classified, packaged, marked and labeled/placarded, and are in all respects in proper condition for transport according to applicable international and national governmental regulations. If export shipment and I am the Primary I certify that the waste minimization statement identified in 40 CFR 262.22(a) (if I am a large quantity generator) or (b) (if I am a small quantity generator) is true.
 Generator's Printed/Typed Name: *Small quantity generator*
 Signature: *[Signature]*
 Month: *09* Day: *03* Year: *10*

16. International Shipments
 Import to U.S. Export from U.S. Port of entry/exit: _____ Date leaving U.S.: _____

17. Transporter Acknowledgment of Receipt of Materials
 Transporter 1 Printed/Typed Name: *[Signature]* Signature: _____ Month: _____ Day: _____ Year: _____
 Transporter 2 Printed/Typed Name: TONY ASHBAKER Signature: *[Signature]* Month: *09* Day: *03* Year: *14*

18. Discrepancy
 18a. Discrepancy Indicator Space
 Quantity Type Residue Partial Rejection Full Rejection
 Manifest Reference Number: _____ U.S. EPA ID Number: _____

18b. Alternate Facility (or Generator)
 Facility's Name: _____ U.S. EPA ID Number: _____
 Facility's Phone: _____
 Signature of Alternate Facility (or Generator): _____ Month: _____ Day: _____ Year: _____

19. Hazardous Waste Report Management Method Codes (i.e., codes for hazardous waste treatment, disposal, and recycling systems)
 1. *H040* 2. *H040* 3. *H04G* 4. *H04C*

20. Designated Facility Owner or Operator Certification of receipt of hazardous materials covered by the manifest except as noted in item 18a
 Printed/Typed Name: *[Signature]* Signature: _____ Month: _____ Day: _____ Year: _____

Clean Harbors has the appropriate permits for and will accept the waste the generator is shipping.

61-10

UNIFORM HAZARDOUS WASTE MANIFEST (Continuation Sheet) 21. Generator ID Number WA7890000967 22. Page 2 of 2 23. Manifest Tracking Number 0078673800

24. Generator's Name MS DOE Hartford Site

25. Transporter 3 Company Name SUT Expressway Inc U.S. EPA ID Number 42R000573770

26. Transporter 4 Company Name [Handwritten Name] U.S. EPA ID Number [Handwritten Number]

27a. HM	27b. U.S. DOT Description (including Proper Shipping Name, Hazard Class, ID Number, and Packing Group (if any))	28. Containers		29. Total Quantity	30. Unit (ML/Vol.)	31. Waste Codes		
		No.	Type					
X	5. UN2825, WASTE SODIUM ALUMINUM HYDRIDE, 4.3, PG II	001	DM	00005	P	D001	D003	
X	6. UN1748, WASTE CALCIUM HYPOCHLORITE, DRY, (CALCIUM HYPOCHLORITE 70%), 5.1, PG II	001	DF	00030	P	WT02	D001	
X	7. UN2810, WASTE TOXIC LIQUIDS, ORGANIC, N.O.S. (CADMIUM FOIL, CHLOROFORM), 6.1, PG II	001	CF	00100	P	WT02	D006	D022
X	8. UN3294, WASTE CORROSIVE LIQUID, BASIC, INORGANIC, N.O.S. (AMMONIUM HYDROXIDE, SODIUM HYDROXIDE), 8, PG II	001	DF	00010	P	WT02	D002	
X	9. UN3054, WASTE CORROSIVE LIQUID, ACIDIC, INORGANIC, N.O.S. (SULFURIC ACID, HYDROCHLORIC ACID), 8, PG II	001	CF	00035	P	D002		
X	10. UN2031, WASTE NITRIC ACID, OTHER THAN RED FUMING, WITH AT LEAST 65 PERCENT, BUT NOT MORE THAN 70 PERCENT NITRIC ACID, 8 (6.1), PG II	001	DF	00005	P	D001	D002	
X	11. UN1701, WASTE HYPOCHLORITE SOLUTIONS, 8, PG II	001	DF	00005	P	WT02	D002	

32. Special Handling Instructions and Additional Information
 5. LCCPA 2001100 1KG 6. LCCPA 2001100 1KG
 7. LCCPA 2001100 1KG 8. LCCPA 2001100 1KG
 9. LCCPA 2001100 1KG 10. LCCPA 2001100 1KG
 11. LCCPA 2001100 1KG

33. Transporter 3 Acknowledgment of Receipt of Materials
 Printed/Typed Name: TONY ASHBAKER Signature: [Signature] Month: 09 Day: 03 Year: 14
 34. Transporter 4 Acknowledgment of Receipt of Materials
 Printed/Typed Name: [Handwritten Name] Signature: [Signature] Month: 09 Day: 14 Year: 14

35. Discrepancy

36. Hazardous Waste Report Management Method Codes (i.e., codes for hazardous waste treatment, disposal, and recycling systems)
 2. H040 3. H040 4. H040 5. H040 6. H040
 10. H040 11. H040

UNIFORM HAZARDOUS WASTE MANIFEST

1. Generator ID Number: **WA7890008957** 2. Page 1 of **2** 3. Emergency Response Phone: **(800) 483-3710** 4. Manifest Tracking Number: **007857356 FLE**

5. Generator's Name and Mailing Address:
US DOE Hanford Site
US DOE Hanford Site PO Box 550
Richland, WA 99354
 Generator's Phone: **800-474-3770**

Generator's Site Address (if different than mailing address):
Life Sciences Laboratory - 1 (331 Building)
331 Lyman Street / 300 Area
Richland, WA 99354 *fb 4/9/15*

6. Transporter 1 Company Name: **Clean Harbors Environmental Services Inc.** U.S. EPA ID Number: **MA0035322250**

7. Transporter 2 Company Name: **SW EXP/IMP/EXP Inc** U.S. EPA ID Number: **AZAC00573770**

8. Designated Facility Name and Site Address:
Clean Harbors LaPorte, LLC
800 Independence Parkway South
Foley, Texas TX 77571

U.S. EPA ID Number: **TXD982290140**

9a. HW	9b. U.S. DOT Description (including Proper Shipping Name, Hazard Class, ID Number, and Packing Group (if any))	10. Containers		11. Total Quantity	12. Unit WL/Vol.	13. Waste Codes		
		No.	Type					
X	UN1956. WASTE COMPRESSED GASES, N.O.S., (FREON 22) 2.2	001	CY	00005	P			OUTS0011
X	UN1956. WASTE COMPRESSED GASES, N.O.S., (FREON 14), 2.2	001	CY	00005	P			OUTS0011

14. Special Handling Instructions and Additional Information:
 1. LACTE ERG# 125
 2. LACTE ERG# 125

15. GENERATOR'S/OFFEROR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by the proper shipping name, and are classified, packaged, marked and labeled/placarded, and are in all respects in proper condition for transport according to applicable international and national governmental regulations. If export shipment and I am the Primary Exporter, I certify that the contents of this consignment conform to the terms of the attached EPA Acknowledgment of Consent. I certify that the waste minimization statement identified in 40 CFR 262.27(a) (if I am a large quantity generator) or (b) (if I am a small quantity generator) is true.

Generator's/Officer's Printed/Typed Name: *Emily M. ...* Signature: *[Signature]* Month: *03* Day: *10* Year: *11*

16. International Shipments: Import to U.S. Export from U.S. Port of entry/exit: _____
 Transporter signature (for exports only): _____ Date leaving U.S.: _____

17. Transporter Acknowledgment of Receipt of Materials

Transporter 1 Printed/Typed Name: *[Name]* Signature: *[Signature]* Month: *03* Day: *20* Year: *11*

Transporter 2 Printed/Typed Name: *Wright Petroleum* Signature: *[Signature]* Month: *03* Day: *20* Year: *11*

18. Discrepancy

18a. Discrepancy Indication Space: Quantity Type Residue Partial Rejection Full Rejection

18b. Alternate Facility (or Generator): _____ Manifest Reference Number: _____ U.S. EPA ID Number: _____

18c. Signature of Alternate Facility (or Generator): _____ Month: _____ Day: _____ Year: _____

19. Hazardous Waste Report Management Method Codes (i.e., codes for hazardous waste treatment, disposal, and recycling systems)

1. *1204* 2. *H101* 3. _____ 4. _____

20. Designated Facility Owner or Operator: Certification of receipt of hazardous materials covered by the manifest except as noted in item 18a

Printed/Typed Name: *Lynette Olson* Signature: *[Signature]* Month: *19* Day: *16* Year: *14*

UNIFORM HAZARDOUS WASTE MANIFEST (Continuation Sheet) 21. Generator ID Number 22. Page 23. Manifest Tracking Number

24. Generator's Name

25. Transporter Company Name U.S. EPA ID Number

26. Transporter Company Name U.S. EPA ID Number

Table with 5 main columns: 27a. U.S. DOT Description (including Proper Shipping Name, Hazard Class, ID Number, and Packing Group (if any)); 28. Containers (No., Type); 29. Total Quantity; 30. Unit (WT/Vol); 31. Waste Codes. A large diagonal line is drawn across the table with the word 'EMPTY' written across it.

32. Special Handling Instructions and Additional Information

33. Transporter Acknowledgment of Receipt of Materials Printed/Typed Name Signature Month Day Year

34. Transporter Acknowledgment of Receipt of Materials Printed/Typed Name Signature Month Day Year

35. Designated Facility

36. Hazardous Waste Report Management Method Codes (i.e., codes for hazardous waste treatment, disposal, and recycling systems)

GENERATOR

TRANSPORTER

DESIGNATED FACILITY

DESIGNATED FACILITY TO GENERATOR

Please print or type. (Form designed for use on elite (12-pitch) typewriter.)

Form Approved. OMB No. 2050-0039

UNIFORM HAZARDOUS WASTE MANIFEST		1. Generator ID Number <i>WA 108 428 9101</i>	2. Page 1 of <i>2</i>	3. Emergency Response Phone <i>206 835 7112</i>		4. Manifest Tracking Number 009851955 JJK			
		5. Generator's Name and Mailing Address <i>U.S. DOE, c/o Hanford</i>		Generator's Site Address (if different than mailing address) <i>RPL, 325 Building 325 Cypress St, 300 Area</i>					
Generator's Phone <i>509 372 1111</i>		6. Transporter 1 Company Name <i>US DOE Hanford Site</i>		U.S. EPA ID Number <i>WA 108 428 9101</i>					
7. Transporter 2 Company Name				U.S. EPA ID Number <i>WA 108 428 9101</i>					
8. Designated Facility Name and Site Address <i>ERDF site, 600-Area</i>		U.S. DOE, c/o Hanford		U.S. EPA ID Number <i>WA 108 428 9101</i>					
Facility's Phone: <i>509 372 1111</i>		ERDF Ave, Bldg 6250 Richland, WA 99354							
GENERATOR	9a. HM	9b. U.S. DOT Description (including Proper Shipping Name, Hazard Class, ID Number, and Packing Group (if any))		10. Containers		11. Total Quantity	12. Unit Wt./Vol.	13. Waste Codes	
		1. <i>HAZARDOUS WASTE</i>		No.	Type			<i>106</i>	
		2.							
		3.							
		4.							
14. Special Handling instructions and Additional Information <i>None</i>									
15. GENERATOR'S/OFFEROR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by the proper shipping name, and are classified, packaged, marked and labeled/placarded, and are in all respects in proper condition for transport according to applicable international and national governmental regulations. If export shipment and I am the Primary Exporter, I certify that the contents of this consignment conform to the terms of the attached EPA Acknowledgment of Consent. I certify that the waste minimization statement identified in 46 CFR 262.27(a) (if I am a large quantity generator) or (b) (if I am a small quantity generator) is true.									
Generator's/Offoror's Printed/Typed Name <i>K. A. ...</i>		Signature <i>[Signature]</i>		Month	Day	Year			
TRANSPORTER INT'L	16. International Shipments		<input type="checkbox"/> Import to U.S.	<input type="checkbox"/> Export from U.S.	Port of entry/exit		Date leaving U.S.		
	17. Transporter Acknowledgment of Receipt of Materials								
	Transporter 1 Printed/Typed Name <i>[Name]</i>		Signature <i>[Signature]</i>		Month	Day	Year		
Transporter 2 Printed/Typed Name		Signature		Month	Day	Year			
DESIGNATED FACILITY	18. Discrepancy								
	18a. Discrepancy indication Space								
	<input type="checkbox"/> Quantity		<input type="checkbox"/> Type		<input type="checkbox"/> Residue		<input type="checkbox"/> Partial Rejection		<input type="checkbox"/> Full Rejection
	18b. Alternate Facility (or Generator)		Manifest Reference Number		U.S. EPA ID Number				
	Facility's Phone:		Signature of Alternate Facility (or Generator)		Month	Day	Year		
19. Hazardous Waste Report Management Method Codes (i.e., codes for hazardous waste treatment, disposal, and recycling systems)									
1		2		3		4			
20. Designated Facility Owner or Operator. Certification of receipt of hazardous materials covered by the manifest except as noted in Item 18a									
Printed/Typed Name		Signature		Month	Day	Year			

3.30 Building Manger/Building Emergency Director/Delegate

In general, each PNNL-managed facility has a Building Emergency Director (BED) and a supporting Building Emergency Response Organization (BERO). The primary BED is usually the assigned Building Manager (BM) or their qualified delegate (e.g., Building Engineer, Facility Safety Specialist, or other). In special cases, where it is impractical for the BM to be the primary BED, another qualified person may be designated as the primary BED with the approval of the Plant Operations Manager.

The BM may be assigned responsibility for more than one facility and will determine appropriate alternate BEDs and BERO members for the facility.

Building Managers, typically the primary BED and their delegates, follow the steps in the BED checklist and are responsible for the following:

- Documenting drill attendance, performance and corrective actions
- Keeping the EP program office informed of changes in the building that may have an effect on EP
- Providing a copy of the BEP or EIP to Alternate BEDs and BERO members
- Ensuring that zone wardens are aware of staff that may require assistance in their zone
- Responding to assessment findings and other identified assessment issues
- Verifying completion of building emergency preparedness drills
- Developing and maintaining BEPs and building EIPs on an annual basis
- Posting the building EIPs near a main building entrance
- If applicable, maintaining a current hardcopy of the BEP in the building
- Maintaining current copies of the BEPs on the PNNL Intranet, and
- Participating in tabletop, operational and evacuation drills as scheduled.

BEDs have authority over incidents that occur in or adjacent to their assigned facilities. They are responsible for managing the incident, overseeing the BERO, completing the appropriate items on the BED checklist, event reporting, requesting resources, and coordinating with the Incident Commander upon his/her arrival when/if the event has outside response by a fire department or police department.

Minimum Training Courses – Low Hazard Facilities

403 Building Emergency Director Training for PNNL Facilities that have Building Emergency Procedures

Minimum Training Courses – RPL

404 Building Emergency Director Training for PNNL Hazardous Facilities

Role-Specific Procedures/Policies

EPIP 3.0: Recovery Plan

EPIP 6.0: Communicator Notification System

EPIP 7.0: Active Shooter Response Procedure

EPIP 9.0: Building Emergency Procedure and Emergency Information Posting Development

ERRATA SHEET

350-D Inspection of October 24, 2014

Observation

During an Ecology inspection on October 29, 2014, errors were discovered in the October 24, 2014 weekly inspection documentation. Specifically, Item 177103, a plastic bag containing cadmium-contaminated personnel protective equipment (PPE), had the accumulation date obscured by the waste operations label applied on 10/22/2014. The waste operations label did not have the accumulation date printed on it. This should have been an observation on the October 24, 2014 weekly inspection, and this errata sheet makes that observation as of 10/29/2014. The accumulation date must be noted on the container and visible for inspection.

Corrective Measures Taken

On October 29, 2014, the bag with the obscured label was placed in container 16786, which is properly labeled with the accumulation date of 9/9/2014.

 Eugene Grohs 3/3/2015

Signature/ Printed Name/Date