

INSPECTION REPORT

Inspection Entry Date/Time	08/17/2023 09:03 AM (PT)	Announced: No	
Inspection Exit Date/Time	08/17/2023 01:50 PM (PT)	Access: Granted	
Regulatory Program	RCRA		
Type of Inspection	Compliance Evaluation Inspection (CEI)		
Company Name	Bradken, Inc.		
Facility or Site Name	Bradken Atlas		
Facility/Site Identifier	WAD009241803		
Facility/Site Physical Address	3021 S Wilkeson St		
City, State, Zip Code	Tacoma, WA 98409		
County/Borough	Pierce County		
Generator Status	Large Quantity Generator (LQG)		
NAICS	331513		
Type of Operation	Steel Foundry		
Geographic Coordinates	47.23238, -122.45875		
Mailing Address/Secondary Address	Ms. Susan Wagner, EHS Coordinator swagner@bradken.com 3021 S Wilkeson Tacoma, WA 98409		
City, State, Zip Code	Tacoma, WA 98409		
Permit Number (If Applicable)	Not Applicable		
Lead Inspector:			
Jon Jones	Jones, Jon	Digitally signed by Jones, Jon Date: 2023.10.25 12:57:52 -08'00'	
	EPA Region 10	jones.jon@epa.gov	(907) 227-4316
Supervisor Review:			
Matt Quarterman	MATTHEW QUARTERMAN	Digitally signed by MATTHEW QUARTERMAN Date: 2023.11.02 11:30:41 -07'00'	
	EPA Region 10	quarterman.matthew@epa.gov	(206) 553-2146

SECTION I – INTRODUCTION

Site Entry and Purpose of the Inspection

Type of inspection: Compliance Evaluation Inspection (CEI)

EPA Region 10 Lead Inspector, Jon Jones, arrived at the Bradken Atlas Facility (the “Site” or “Facility”), located at 3021 S Wilkeson St, Tacoma, WA 98409, at 09:03 AM (PT) on 08/17/2023 for an unannounced inspection. EPA Region 10 Lead Inspector presented credentials to and informed Susan Wagner that this was an EPA Region 10 inspection to determine compliance with Resource Conservation and Recovery Act (RCRA). This report is based on information supplied by Bradken Atlas representatives, observations made by the EPA Region 10 inspector, and records and reports maintained at the facility and its HQ including, but not limited to: direct observations

made by the EPA Region 10 Inspector(s), photographs taken by EPA Region 10 inspector(s), physical evidence collected by the EPA Region 10 inspector(s), measurements or samples taken by EPA Region 10 inspector(s), verbal or written statements made by information supplied by the facility representatives during or subsequent to the on-site Inspection, and materials, processes, data, photographs, or documents shown, demonstrated, or submitted to the EPA Region 10 inspector(s) by the facility representatives during or subsequent to the on-site Inspection. In addition, information gathered prior to or after the inspection from a review of USEPA, state, and public records may be included in this report.

Attendees

Title/Organization	Name	Phone	Email	Opening Conf.	Closing Conf.
Lead Inspector/EPA REGION 10	Jon Jones	(907) 271-6329	Jones.Jon@epa.gov	Yes	Yes
Safety & Wellbeing Business Partner/Bradken Atlas	Dale Spencer	(253) 301-8935	dspencer@bradken.com	Yes	Yes
USEPA	Matt Quarterman			Yes	Yes
EHS Coordinator/Bradken Atlas	Susan Wagner	(253) 448-5692	swagner@bradken.com	Yes	Yes

Opening Conference

We met with Bradken Atlas Security personnel in the office lobby upon arrival and explained the purpose of our visit and asked to see Ms. Susan Wagner, EHS Coordinator. While waiting for Ms. Wagner to arrive, Security personnel at the facility initially did not want to allow us in without providing a copy of a Driver's License and wanted to prevent our use of a camera during the inspection. Once Ms. Wagner arrived, we were allowed to enter the facility by showing our credentials and signing the visitor log. Ms. Wagner also said that the use of a camera during the inspection would be allowed. We were also met by Mr. Dale Spencer, Safety & Wellbeing Business Partner.

I presented my credentials to Ms. Wagner and Mr. Spencer and informed them that this was an EPA RCRA inspection. The table above presents all the inspection opening and closing conference participants.

During the inspection we looked at the facility's processes, in addition to hazardous waste management practices, generation points, and accumulation areas. We looked for wastes that facility representatives had not yet identified or designated as hazardous. We also observed the facility's universal waste and used oil management.

Only those areas in which I observed areas of concern or noted other pertinent issues are discussed in this inspection report.

Facility/Site Information

What type of generator facility verified as?	Ms. Wagner verified that the facility was an LQG
What type of generator facility notified?	Large Quantity Generator
Size of Facility	15 acres
Safety Training Provided to Inspector(s)?	No
Operating Hours	Three shifts - 6:00 a.m. to 2:30 p.m., 3:30 p.m. to midnight, and 11:00 p.m. to 6:00 a.m.
Length of Facility at Location	Since 1899
Number of employees	220

Process Description

According to Ms. Wagner and Mr. Spencer, Bradken Atlas produces steel castings for a wide variety of customers, including government agencies and private industry. The foundry has been located at this site for over a century. Facility processes include pouring metal, making steel castings, grinding, welding, and radiography. The radiography is to ensure that castings have no cracks. There's also a lab that conducts tensile testing and QA for their chemical process for pouring.

During the opening conference we were told that there was one SAA and one CAA. During the walk-through portion of the inspection, we actually observed two SAAs and two active CAAs.

The facility generates the following wastes:

- Waste furnace dust – D007 chromium baghouse dust managed as hazardous waste
- Waste aerosols cans – get punctured onsite
- Waste aerosol can residue – managed as hazardous waste
- Waste fixer – silver is recovered and recycled.
- Waste fluorescent lamps – managed as universal waste
- Waste batteries – managed as universal waste
- Used oil

Building(s)

Building/Area/Sub-area	Process Description	Area of Concern
Cleaning Room		Yes
SAA	Accumulation of waste aerosol cans.	Yes
Maintenance		Yes
CAA Connex	Accumulation area for chromium dust generated in the furnace	Yes
Maintenance Wash Bay		No

Oil Storage		No
Universal Waste Area	Aerosol can popping SAA and accumulation of universal waste lamps	Yes
RE2		No
Area just outside entrance	Holding area for spent processor Fixer	No
Storage Area (Butler Building)		Yes

SECTION II – OBSERVATIONS**Building:** Maintenance/Maintenance Wash Bay

Observation #: JJ1-OB-001 **Date:** 08/17/2023 **Contains AOC:** No **Contains CBI:** No

Person Interviewed: Susan Wagner **Title:** EHS Coordinator

While in the Wash Bay we saw a tote that held approximately 300 gallons of process water for testing. At the time of the inspection, the tote was labeled “Spent Processor Fixer - Waste Pending Analysis.” According to Ms. Wagner, the spent fixer wastewater does not designate as hazardous waste/dangerous waste but will occasionally not meet the City of Tacoma discharge limits. According to Ms. Wagner, the spent processor fixer wastewater was sampled by the City of Tacoma on 7/5/23.

Ms. Wagner told us that the results of the Bradken Atlas analytical showed that the wastewater met discharge limits and the City of Tacoma’s test results indicated the wastewater did not meet discharge limits. Ms. Wagner stated that they would either reprocess the wastewater through their silver recovery system or dispose of the wastewater as a non-regulated waste.

Photo(s)

1. [IMG-2023081709474547453224107.jpg](#)
2. [IMG-2023081709475247523074728.jpg](#)
3. [IMG-202308170948004802439689.jpg](#)

Building: Maintenance/Universal Waste Area

Observation #: JJ1-OB-002 **Date:** 08/17/2023 **Contains AOC:** Yes **Contains CBI:** No

Person Interviewed: Susan Wagner **Title:** EHS Coordinator

While we were in the Maintenance area, I inspected a small, fenced area that the facility was using as a universal waste area. While in this fenced universal waste area, I saw that the facility had a 55-gallon closed-top container that was being used as a satellite accumulation area (SAA) container for aerosol can waste residue, generated from puncturing waste aerosol cans in a drum-top aerosol can popper. At the time of the inspection the lid on the can popper was open, and the SAA container was not closed.

I also saw that there was a hazard/risk indicator on the SAA container that was inaccurate. At the time of the inspection, there was a DOT Class 2 flammable gas hazard/risk label on the SAA container. Mr. Spencer closed the aerosol residue SAA container during the inspection.

I asked how the punctured aerosol cans were being managed and Mr. Spencer said that the punctured aerosol cans are thrown away in the trash. Mr. Spencer then said they may get melted in the furnace. I asked Mr. Spencer to follow up with me regarding the management of the punctured aerosol cans. Following the inspection, I received an email from Mr. Spencer on 8/21/23. In that email, Mr. Spencer stated that, “Our empty paint cans (universal waste) will be recycled through our metal recycling vendor.” I received another

email from Mr. Spencer on 8/21/23 and that email included a photo of the 55-gallon waste aerosol residue SAA container after it had been labeled with a DOT Class 3 flammable liquid hazard/risk indicator.

Document(s)

1. Universal Waste (Flammable Liquid).docx

Photo(s)

1. [IMG-2023081709535153513801109.jpg](#)
2. [IMG-202308170954005402511532.jpg](#)
3. [IMG-202308170954085482906240.jpg](#)
4. [IMG-2023081709542454242950451.jpg](#)
5. [IMG-20230817100905953789338.jpg](#)

Building: Maintenance/Universal Waste Area

Observation #: JJ1-OB-003 **Date:** 08/17/2023 **Contains AOC:** Yes **Contains CBI:** No

Person Interviewed: Susan Wagner **Title:** EHS Coordinator

While in the universal waste area, we saw four cardboard boxes that held four-foot waste fluorescent lamps and one cardboard box that held eight-foot waste fluorescent lamps. At the time of the inspection, none of the five cardboard boxes of waste fluorescent lamps were labeled with either the phrase "Universal Waste-Lamps," "Used lamps," or "Waste Lamps." All five boxes were not closed. There were also three loose bulbs that were not packaged or labeled.

Mr. Spencer had facility personnel package the loose bulbs, close the open boxes, and label each box with the words "Universal Waste-Lamps" during the inspection.

Document(s)

1. Additional Signage added.docx

Photo(s)

1. [IMG-202308171002302303080216.jpg](#)
2. [IMG-202308171002402403453810.jpg](#)
3. [IMG-202308171002472473162521.jpg](#)
4. [IMG-202308171002552553252590.jpg](#)
5. [IMG-20230817100306362775253.jpg](#)
6. [IMG-202308171024032433173969.jpg](#)
7. [IMG-2023081710241524153006764.jpg](#)
8. [IMG-2023081710242124213466775.jpg](#)

Building: Maintenance/CAA Connex

Observation #: JJ1-OB-004 **Date:** 08/17/2023 **Contains AOC:** Yes **Contains CBI:** No

Person Interviewed: Susan Wagner **Title:** EHS Coordinator

While in the central accumulation area (CAA) Connex, we saw five, cubic yard super sacks that, according to labeling, contained waste furnace dust with chromium (D007). At the time of the inspection, all five super sacks

were marked with hazardous waste labels and an accumulation start date (ASD), but none were marked with hazard/risk indicators. At the time of the inspection, all five waste super sacks had been in accumulation for less than 90 days. The words Class 9 N.O.S. were written on each of the hazardous waste labels and I explained to Ms. Wagner and Mr. Spencer that Class 9 N.O.S. was not specific to the hazard/risk.

Mr. Spencer had facility personnel place stickers on each super sack, during the inspection, that contained the word "TOXIC."

Photo(s)

1. [IMG-202308171018061863617465.jpg](#)
2. [IMG-2023081710181418143778742.jpg](#)
3. [IMG-202308171019021922760351.jpg](#)
4. [IMG-2023081710191619162934502.jpg](#)
5. [IMG-2023081711101410143587245.jpg](#)
6. [IMG-2023081711102610263147834.jpg](#)

Building: Storage Area (Butler Building)

Observation #: JJ1-OB-006 **Date:** 08/17/2023 **Contains AOC:** Yes **Contains CBI:** No

Person Interviewed: SW **Title:** EHS

While inspecting the contents of a flammable storage cabinet in the Butler Building, I saw two aerosol cans that were waste aerosol cans. Mr. Spencer verified that the aerosol cans were a waste and should go to the SAA can popper.

Photo(s)

1. [IMG-202308171100560562358569.jpg](#)
2. [IMG-20230817110103132142280.jpg](#)
3. [IMG-202308171101241242702261.jpg](#)

Building: Cleaning Room 1/SAA

Observation #: JJ1-OB-008 **Date:** 08/17/2023 **Contains AOC:** Yes **Contains CBI:** No

Person Interviewed: SW **Title:** EHS

While in Cleaning Room 1, we saw a 55-gallon SAA container that was being used for the accumulation of waste aerosol cans. At the time of the inspection the container was not closed. There was a round hole in the container lid with a waste aerosol can protruding from the hole and four additional waste aerosol cans were on the top of the container.

Photo(s)

1. [IMG-2023081711472147212300436.jpg](#)
2. [IMG-2023081711473147312325177.jpg](#)

SECTION III – RECORDS REVIEW

Record: Inspections		AOC: Yes
Ref #: JJ1-RR-001	Reviewed By: Jon Jones	Reviewed Date: 08/17/2023
During the inspection, I requested weekly hazardous waste inspections for the period covering August 17, 2020, through August 17, 2023 (3 years). At the time of the inspection, Ms. Wagner printed copies of weekly inspections covering the period of January through May of 2023. She stated that she was having problems with the printer and was unable to provide copies of any other weekly inspections. I explained to Ms. Wagner that it was common for facilities to maintain weekly inspection logs electronically and I asked if I could visually inspect them on a company computer. Ms. Wagner told us that she would rather provide them to me following the inspection. I explained to Ms. Wagner that I looked at electronic records on facility computers during the majority of my RCRA inspections and again expressed my interest in viewing the facility's weekly hazardous waste inspection logs prior to leaving the facility. Ms. Wagner again reiterated that she would rather send them to me following the inspection. I told her that would be fine. On 8/21/2023, I received an email from Mr. Spencer that included weekly hazardous waste inspection logs covering the period of August 17, 2020, through July 29, 2023. Inspection logs for the first three weeks of August 2023 were not provided. During my inspection of these weekly logs, I saw that there was no weekly inspection conducted for the following 25 weeks: • 12/27/2020 through 01/02/2021 • 01/23/2022 through 01/29/2022 • 02/13/2022 through 02/19/2022 • 02/20/2022 through 02/26/2022 • 04/03/2022 through 04/09/2022 • 04/10/2022 through 04/16/2022 • 04/17/2022 through 04/23/2022 • 04/24/2022 through 04/30/2022 • 05/01/2022 through 05/07/2022 • 05/08/2022 through 05/14/2022 • 05/15/2022 through 05/21/2022 • 05/22/2022 through 05/28/2022 • 05/29/2022 through 06/04/2022 • 06/19/2022 through 06/25/2022 • 06/26/2022 through 07/02/2022 • 07/03/2022 through 07/09/2022 • 07/10/2022 through 07/16/2022 • 07/17/2022 through 07/23/2022 • 07/24/2022 through 07/30/2022 • 03/05/2023 through 03/11/2023 • 03/12/2023 through 03/18/2023 • 03/19/2023 through 03/25/2023 • 03/26/2023 through 04/01/2023 • 04/02/2023 through 04/08/2023 • 04/09/2023 through 04/15/2023 Additional areas of concern were noted during the inspection of the weekly hazardous waste inspection logs that were provided following the facility inspection. These concerns are as follows: • Lack of attention to detail		

- Inspection log question, Are any drums leaking? The block for this question was continuously marked with a "Y" on almost all inspection logs indicating yes.
- Inspection log question, Are all containers marked with appropriate labeling? The "Yes" block for this question was marked with a check mark for every week that waste super sacks were present in the CAA between 06/12/2023 and 08/17/2023.
- Weekly inspections were also documented as occurring on holidays when the facility was not operating.

Document(s)

1. Haz. Waste Inspection ~ 2020.pdf
2. Haz. Waste Inspection ~ 2021.pdf
3. Haz. Waste Inspection ~ 2022.pdf
4. Haz. Waste Inspection ~ 2022 (2).pdf
5. Haz. Waste Inspection ~ 2023.pdf
6. Haz. Waste Inspection ~ 2023 (2).pdf
7. 2023 ~ Haz Waste Weekly Inspection Checklist.docx
8. Logs obtained during CEI (1).pdf
9. Logs obtained during CEI (2).pdf
10. Logs obtained during CEI (3).pdf
11. Logs obtained during CEI (4).pdf
12. Logs obtained during CEI (5).pdf

SECTION IV – AREA OF CONCERN

The presentation of Area(s) of Concern does not constitute a formal compliance determination or violation.

Building: Maintenance	Area: Universal Waste Area	Sub-area:
JJ1-OB-002		
At the time of the inspection, the lid on the aerosol can popper was open, and the SAA container of waste aerosol can residue was not closed. The hazard/risk indicator on the SAA container of waste aerosol can residue was not accurate.	Regulation:	Sections:
Building: Maintenance	Area: Universal Waste Area	Sub-area:
JJ1-OB-003		
Five cardboard boxes of waste fluorescent lamps were not labeled with either the phrase "Universal Waste-Lamps," "Used Lamps," or "Waste Lamps." All five boxes of waste fluorescent lamps were not closed.	Regulation:	Sections:

There were also three loose bulbs that were not packaged or labeled.		
Building: Maintenance	Area: CAA Connex	Sub-area:
JJ1-OB-004		
Five, cubic yard super sacks that contained waste furnace dust with chromium (D007) were not marked with hazard/risk indicators.	Regulation:	Sections:
Building: Storage Area (Butler Building)	Area:	Sub-area:
JJ1-OB-006		
Two waste aerosol cans that were found inside of a flammable storage cabinet. The aerosol cans were not labeled with the words "Hazardous Waste." Mr. Spencer verified that the aerosol cans were a waste and should go to the SAA can popper.	Regulation:	Sections:
Building: Cleaning Room	Area: SAA	Sub-area:
JJ1-OB-008		
A 55-gallon waste aerosol can SAA container was not closed, and four waste aerosol cans were accumulating on the top of the container. The four waste aerosol cans on top of the SAA container were not labeled with the words, "Hazardous Waste."	Regulation:	Sections:

Record: Inspections		
JJ1-RR-001		
There were no weekly hazardous waste inspections conducted for the following 25 weeks: 12/27/2020 through 01/02/2021 01/23/2022 through 01/29/2022	Regulation:	Sections:

• 02/13/2022 through 02/19/2022 • 02/20/2022 through 02/26/2022 • 04/03/2022 through 04/09/2022 • 04/10/2022 through 04/16/2022 • 04/17/2022 through 04/23/2022 • 04/24/2022 through 04/30/2022 • 05/01/2022 through 05/07/2022 • 05/08/2022 through 05/14/2022 • 05/15/2022 through 05/21/2022 • 05/22/2022 through 05/28/2022 • 05/29/2022 through 06/04/2022 • 06/19/2022 through 06/25/2022 • 06/26/2022 through 07/02/2022 • 07/03/2022 through 07/09/2022 • 07/10/2022 through 07/16/2022 • 07/17/2022 through 07/23/2022 • 07/24/2022 through 07/30/2022 • 03/05/2023 through 03/11/2023 • 03/12/2023 through 03/18/2023 • 03/19/2023 through 03/25/2023 • 03/26/2023 through 04/01/2023 • 04/02/2023 through 04/08/2023 • 04/09/2023 through 04/15/2023		
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SECTION V – CLOSING CONFERENCE AND FOLLOW UP**Closing Conference**

At the conclusion of the inspection, we conducted a closing conference that was attended by those listed in the Attendees table, in Section I of this report. We thanked everyone for their time and cooperation during the inspection and began a review of the areas of concern (listed in Section III – Areas of Concern) that we observed during the inspection of the facility. I then explained the follow-up process that would take place once I finished the report. I explained they would receive a copy of the report as would a case officer. I told them the case officer would review the report to determine if any of my areas of concern documented violations.

SECTION VI – SAMPLING ACTIVITIES AND ANALYTICAL RESULTS - No sampling was conducted.**SECTION VII – LIST OF APPENDICES**

1. Photo Log
2. Document Log

APPENDIX 1: PHOTO LOG



[Title]			IMG-2023081709474547453224107.jpg
08/17/2023 09:47 AM (PT)	No CBI	No PII	Photographer: Jon Jones
Maintenance/Maintenance Wash Bay			47.23214896, -122.45949561
Tote labeled "Pending Analysis."			



[Title]			IMG-2023081709475247523074728.jpg
08/17/2023 09:47 AM (PT)	No CBI	No PII	Photographer: Jon Jones
Maintenance/Maintenance Wash Bay			47.23219649, -122.45955898
Close-up view of the same tote.			



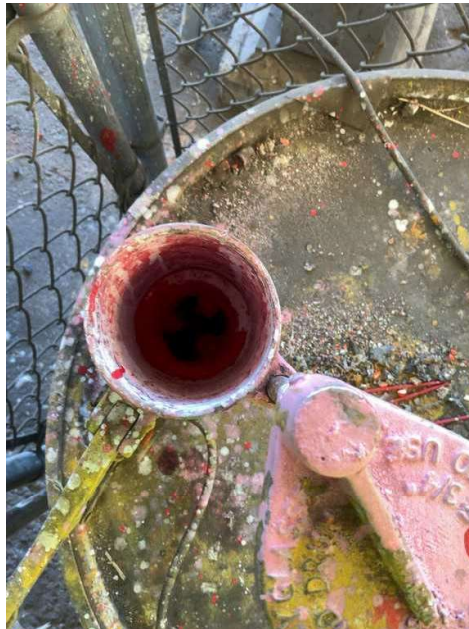
[Title]			IMG-202308170948004802439689.jpg
08/17/2023 09:48 AM (PT)	No CBI	No PII	Photographer: Jon Jones
Maintenance/Maintenance Wash Bay			47.23217662, -122.45956837
Another view of the same tote.			



[Title]			IMG-2023081709535153513801109.jpg
08/17/2023 09:53 AM (PT)	No CBI	No PII	Photographer: Jon Jones
Maintenance/Universal Waste Area			47.23218807, -122.45938078
View of the SAA container holding waste aerosol residue.			



[Title]			IMG-202308170954005402511532.jpg
08/17/2023 09:54 AM (PT)	No CBI	No PII	Photographer: Jon Jones
Maintenance/Universal Waste Area			47.23220014, -122.45935102
Another view of the same waste aerosol residue SAA container, showing that it is not closed.			



[Title]			IMG-202308170954085482906240.jpg
08/17/2023 09:54 AM (PT)	No CBI	No PII	Photographer: Jon Jones
Maintenance/Universal Waste Area			47.23221661, -122.45933694
Another view of the same waste aerosol residue SAA container, showing that it is not closed.			



[Title]			IMG-2023081709542454242950451.jpg
08/17/2023 09:54 AM (PT)	No CBI	No PII	Photographer: Jon Jones
Maintenance/Universal Waste Area			47.23220169, -122.45931909
View of the SAA container with a hazard/risk indicator that is not accurate.			



[Title]			IMG-202308171002302303080216.jpg
08/17/2023 10:02 AM (PT)	No CBI	No PII	Photographer: Jon Jones
Maintenance/Universal Waste Area			47.23231279, -122.4593144
View of the universal waste containers			



[Title]			IMG-202308171002402403453810.jpg
08/17/2023 10:02 AM (PT)	No CBI	No PII	Photographer: Jon Jones
Maintenance/Universal Waste Area			47.23232884, -122.45932873
View of waste bulbs that are not packaged.			



[Title]			IMG-202308171002472473162521.jpg
08/17/2023 10:02 AM (PT)	No CBI	No PII	Photographer: Jon Jones
Maintenance/Universal Waste Area			47.23233718, -122.4592921
View of the universal waste containers that are not closed.			



[Title]			IMG-202308171002552553252590.jpg
08/17/2023 10:02 AM (PT)	No CBI	No PII	Photographer: Jon Jones
Maintenance/Universal Waste Area			47.23231744, -122.45928959
Another view of the universal waste containers that are not closed.			



[Title]			IMG-20230817100306362775253.jpg
08/17/2023 10:03 AM (PT)	No CBI	No PII	Photographer: Jon Jones
Maintenance/Universal Waste Area			47.23231761, -122.45927752
Another view of the universal waste containers that are not closed.			



[Title]			IMG-20230817100905953789338.jpg
08/17/2023 10:09 AM (PT)	No CBI	No PII	Photographer: Jon Jones
Maintenance/Universal Waste Area			47.23245867, -122.45914894
View of the waste aerosol residue SAA container after being closed.			



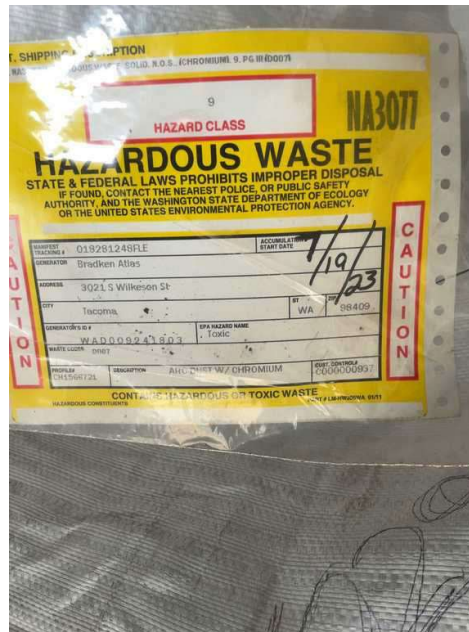
[Title]			IMG-202308171018061863617465.jpg
08/17/2023 10:18 AM (PT)	No CBI	No PII	Photographer: Jon Jones
Maintenance/CAA Connex			47.23262439, -122.4597039
View of supersacks containing waste furnace dust in the CAA, showing that they are not marked with hazard/risk labels.			



[Title]			IMG-2023081710181418143778742.jpg
08/17/2023 10:18 AM (PT)	No CBI	No PII	Photographer: Jon Jones
Maintenance/CAA Connex			47.23262497, -122.45967834
View of supersack containing waste furnace dust in the CAA, showing that it is not marked with a hazard/risk label.			



[Title]			IMG-202308171019021922760351.jpg
08/17/2023 10:19 AM (PT)	No CBI	No PII	Photographer: Jon Jones
Maintenance/CAA Connex			47.23261978, -122.45967004
Another view of supersacks containing waste furnace dust in the CAA, showing that they are not marked with hazard/risk labels.			



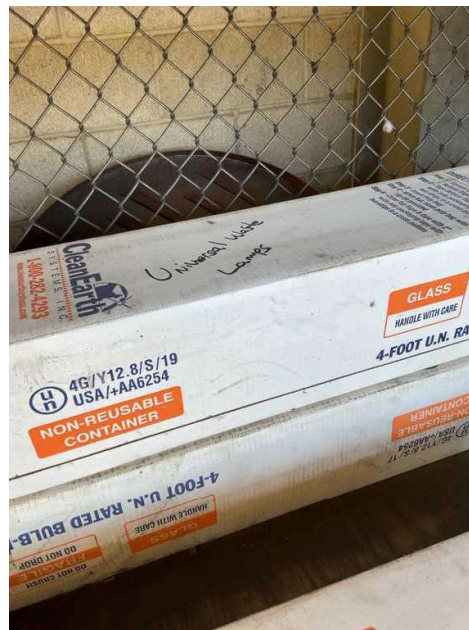
[Title]			IMG-2023081710191619162934502.jpg
08/17/2023 10:19 AM (PT)	No CBI	No PII	Photographer: Jon Jones
Maintenance/CAA Connex			47.2326295, -122.45967845
Close-up view of the label, showing that it is marked as Class 9 N.O.S. Class 9 is not specific to the hazard and cannot be used as a hazard/risk indicator.			



[Title]			IMG-202308171024032433173969.jpg
08/17/2023 10:24 AM (PT)	No CBI	No PII	Photographer: Jon Jones
Maintenance/Universal Waste Area			47.23234095, -122.45943769
View of the universal waste containers after being closed and labeled.			



[Title]			IMG-2023081710241524153006764.jpg
08/17/2023 10:24 AM (PT)	No CBI	No PII	Photographer: Jon Jones
Maintenance/Universal Waste Area			47.23232306, -122.45941565
View of the universal waste containers after being closed and labeled.			



[Title]			IMG-2023081710242124213466775.jpg
08/17/2023 10:24 AM (PT)	No CBI	No PII	Photographer: Jon Jones
Maintenance/Universal Waste Area			47.23231069, -122.45938086
View of the universal waste containers after being closed and labeled.			



[Title]			IMG-202308171100560562358569.jpg
08/17/2023 11:00 AM (PT)	No CBI	No PII	Photographer: Jon Jones
Storage Area (Butler Building)			47.23330152, -122.46108977
View of two waste aerosol cans, seen here on the left, that were found inside the yellow flammable storage cabinet, seen here on the right.			



[Title]			IMG-20230817110103132142280.jpg
08/17/2023 11:01 AM (PT)	No CBI	No PII	Photographer: Jon Jones
Storage Area (Butler Building)			47.23328718, -122.46118381
Close-up view of the waste aerosol cans.			



[Title]			IMG-202308171101241242702261.jpg
08/17/2023 11:01 AM (PT)	No CBI	No PII	Photographer: Jon Jones
Storage Area (Butler Building)			47.23327893, -122.46122363
Another close-up view of the waste aerosol cans.			



[Title]			IMG-2023081711101410143587245.jpg
08/17/2023 11:10 AM (PT)	No CBI	No PII	Photographer: Jon Jones
Maintenance/CAA Connex			47.23262535, -122.45974615
View of the supersacks in the CAA after being labeled with hazard/risk labels.			



[Title]			IMG-2023081711102610263147834.jpg
08/17/2023 11:10 AM (PT)	No CBI	No PII	Photographer: Jon Jones
Maintenance/CAA Connex			47.23261592, -122.45972075
View of the supersacks in the CAA after being labeled with hazard/risk labels.			



[Title]			IMG-20230817111472147212300436.jpg
08/17/2023 11:47 AM (PT)	No CBI	No PII	Photographer: Jon Jones
Cleaning Room/SAA			47.23365335, -122.46004974
View of the waste aerosol SAA container showing that it is not closed with additional waste aerosol cans seen on top of the container.			



[Title]			IMG-2023081711473147312325177.jpg
08/17/2023 11:47 AM (PT)	No CBI	No PII	Photographer: Jon Jones
Cleaning Room/SAA			47.23371269, -122.45986199
Another view of the waste aerosol SAA container showing that it is not closed with additional waste aerosol cans seen on top of the container.			

APPENDIX 2: DOCUMENT LOG

Document Type	Document Name	Contains CBI	Contains PII	Uploaded By	Date Received
Records Review	Haz. Waste Inspection ~ 2020.pdf	No	No	Jon Jones	10/05/2023
Records Review	Haz. Waste Inspection ~ 2021.pdf	No	No	Jon Jones	10/05/2023
Records Review	Haz. Waste Inspection ~ 2022.pdf	No	No	Jon Jones	10/05/2023
Records Review	Haz. Waste Inspection ~ 2022 (2).pdf	No	No	Jon Jones	10/05/2023
Records Review	Haz. Waste Inspection ~ 2023.pdf	No	No	Jon Jones	10/05/2023
Records Review	Haz. Waste Inspection ~ 2023 (2).pdf	No	No	Jon Jones	10/05/2023
Communications	RE Universal Waste .msg	No	No	Jon Jones	10/05/2023
Communications	RE Universal Waste(2) .msg	No	No	Jon Jones	10/05/2023
Communications	Universal Waste(3).msg	No	No	Jon Jones	10/05/2023
Communications	Re Universal Waste(4).msg	No	No	Jon Jones	10/05/2023
Communications	RE Universal Waste(5).msg	No	No	Jon Jones	10/05/2023
Communications	RE Universal Waste (6).msg	No	No	Jon Jones	10/05/2023
Communications	RE Universal Waste(7).msg	No	No	Jon Jones	10/05/2023
Communications	RE Universal Waste(8) .msg	No	No	Jon Jones	10/05/2023
Communications	Re Universal Waste(9) .msg	No	No	Jon Jones	10/05/2023
Records Review	2023 ~ Haz Waste Weekly Inspection Checklist.docx	No	No	Jon Jones	10/05/2023
Other - Updated signage	Additional Signage added.docx	No	No	Jon Jones	10/05/2023
Other - Updated container labeling	Universal Waste (Flammable Liquid).docx	No	No	Jon Jones	10/05/2023
Records Review	Logs obtained during CEI (1).pdf	No	No	Jon Jones	10/05/2023

Records Review	Logs obtained during CEI (2).pdf	No	No	Jon Jones	10/05/2023
Records Review	Logs obtained during CEI (3).pdf	No	No	Jon Jones	10/05/2023
Records Review	Logs obtained during CEI (4).pdf	No	No	Jon Jones	10/05/2023
Records Review	Logs obtained during CEI (5).pdf	No	No	Jon Jones	10/05/2023