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Department of Energy
Carlsbad Field Office
P. O. Box 3090
Carlsbad, New Mexico 88221
OCT 10 2012



Mr. Jon E. Hoff, Manager
Quality Assurance
Nuclear Waste Partnership LLC
P.O. Box 2078
Carlsbad, NM 88221-2078

Subject: Surveillance Report for Surveillance S-12-11, WTS Hazard Communication and Control of Hazardous Chemicals/Gases

Dear Mr. Hoff:

The Carlsbad Field Office conducted a surveillance of Washington TRU Solutions, LLC (WTS) Hazard Communication (HazCom) and Control of Hazardous Chemicals/Gases, September 18 – 20, 2012. The results of the surveillance are documented in the enclosed report.

The surveillance team concluded that the requirements for the areas evaluated are satisfactorily implemented and achieve the desired results.

If you have any questions, please contact me at (575) 234-7459.

Sincerely,

Richard Farrell
Quality Assurance Specialist

Enclosure

cc: w/enclosure

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ED	D. Winters, DNFSB	ED
ED	M. Mager, CTAC	ED
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CBFO SURVEILLANCE REPORT

Surveillance Number: S-12-11 **Date of Surveillance:** September 18 – 20, 2012

Surveillance Title: Hazard Communication (HazCom) and Control of Hazardous Chemicals/Gases

Organization: Washington TRU Solutions, LLC (WTS)

Surveillance Team:

Richard Farrell	Management Representative, Carlsbad Field Office (CBFO) Office of Quality Assurance
Tamara Bowden	Team Leader, CBFO Technical Assistance Contractor (CTAC)
Priscilla Martinez	Team Member, CTAC
Cindi Castillo	Team Member, CTAC
Rich Kalinski	Team Member, CTAC

Surveillance Scope:

The surveillance team reviewed documentation and records, interviewed responsible personnel, and witnessed activities relative to the WTS HazCom and Control of Hazardous Chemicals/Gases Programs at the Waste Isolation Pilot Plant (WIPP) to verify compliance with applicable requirements.

Surveillance Results:

Activities Evaluated:

- Hazard Assessment
- Hazardous Chemical Labeling
- Hazardous Chemical Storage/Handling
- Material Safety Data Sheets (MSDS)
- Hazardous Material Inventories
- Hazardous Waste Storage Area/Satellite Accumulation Area
- Emergency Spill Response
- Ambient Air Monitoring
- Chemical Hygiene

The following documents were used as the basis for this surveillance:

- 30 Code of Federal Regulations (CFR) Part 47, Hazard Communication
- 29 CFR Part 1910.1200, Hazard Communication
- WP 12-IH.01, *Chemical Hygiene Plan*
- WP 12-IH.02, *WIPP Industrial Hygiene Program Manual – Overview*

- WP 12-IH.02-1, *WIPP Industrial Hygiene Program – Hazard Assessment*
- WP 12-IH.02-3, *WIPP Industrial Hygiene Program – Hazardous Waste Operations & Emergency Response*
- WP 12-IH.02-4, *WIPP Industrial Hygiene Program – Hazard Communication & Hazardous Materials Management Plan*
- WP 02-RC3109, *Satellite Accumulation Area, Hazardous Waste Storage Area, and Universal Waste Storage Area Inspections*

Chemical Hygiene Plan, WP 12-IH.01

The WIPP *Chemical Hygiene Plan* is designed to provide a framework for the safe and healthful performance of chemical laboratory activities conducted at WIPP facilities. No laboratory facility at the WIPP site falls under this procedure at this time. WTS maintains this plan ready for implementation as applicable to current operations. Laboratory functions are being performed at the Carlsbad Environmental Monitoring and Research Center (CEMRC) under contract with the Los Alamos National Laboratory Carlsbad Operations (LANL-CO). CEMRC and LANL-CO were previously audited in May 2012 (Audit A-12-07).

WIPP Industrial Hygiene Program Manual - WP 12-IH.02

The surveillance team verified that Industrial Hygiene (IH) staff identify, monitor, and document existing and potential occupational health hazards through a biennial Industrial Hygiene Status Report and Assessment Strategy. The last report was issued on September 12, 2012.

The surveillance team found that IH staff had issued multiple information releases since the last surveillance, including Integrated Safety Management System (ISMS) Performance Monthly Projects for WTS management, with mentoring topics such as Safety News Bulletins, Lessons Learned as a support program with timely response, and emails regarding hearing protection and ergonomics. Quarterly safety meetings are facilitated by the Safety Awareness Committee.

The surveillance team verified that IH personnel continue to investigate concerns, provide adequate program support and prompt response, and conduct unscheduled surveys or inspections. All of these elements were verified as being tracked in the IH database as required.

The IH Program utilizes approved, accredited facilities. The Industrial Hygienist completes workload assessments, utilizes Hazard Communications, and completes respiratory protection processes in accordance with procedure requirements. These elements were verified through review of data entered and stored in the IH database.

The surveillance team examined records relative to the training and qualifications for the Industrial Hygienist and back-up personnel and determined that all required training had been fulfilled.

WIPP Industrial Hygiene Program – Health Hazard Assessment, WP 12-IH.02-1

The surveillance team verified that approved engines are maintained in accordance with 30 CFR 57.5066, Maintenance Standards. Objective evidence reviewed included Work Order #1209692 dated September 8, 2012. The work order demonstrated maintenance performed, testing requirements, and the use of associated measuring and test equipment.

Underground diesel equipment continues to meet the emission standards required by PM 074027, Revision 7, *Quarterly Diesel Emissions Test*. The surveillance team conducted an underground walk-through and examined historical documentation to verify that diesel emission tests are performed in compliance with PM 074027, *Quarterly Diesel Emissions Test*. Tests performed were verified as compliant with approved industrial methods using certified multi-gas testing equipment for carbon monoxide and carbon dioxide.

WIPP Industrial Hygiene Program – Hazardous Waste Operations and Emergency Response, WP 12-IH.02-3

The surveillance team verified that the WIPP IH Program adequately addresses the requirements of 29 CFR 1910.120 through WP 12-IH.02-3, Revision 3, *Hazardous Waste Operations and Emergency Response*. The WIPP ISMS contains elements to assure that workers performing assigned duties are protected from potential health and safety hazards. Required program elements are addressed and flow down to the applicable implementing procedures.

Records selected for review were verified as being retained in accordance with the current Records Inventory and Disposition Schedule dated May 2, 2012. The applicable records, inventories, reports, and monitoring data are easily accessible to Health Services and are located in approved, fire-rated cabinets on the first floor of the Safety Building.

WIPP Industrial Hygiene Program – Hazard Communication and Hazardous Materials Management Plan, WP 12-IH.02-4

The surveillance team verified the IH Program was designed to be a ready resource of material hazard information and a guide for the management of hazardous materials. The hazardous material inventory and the material safety data sheet (MSDS) database were verified to be current and accurate. The MSDS database is accessible to all employees as it resides on the WIPP Intranet.

A random selection of the Hazardous Materials Area Representatives was reviewed for the verification of appropriate training. Hazardous materials inventories are submitted to IH on a quarterly basis. Inspection of containers of hazardous materials verified that the labels contained required information such as material identity, appropriate hazard warning, and manufacturer's name and address.

Waste Accumulation Area Inspections, WP 02-RC3109

The surveillance team verified that inspections of the waste accumulation areas were performed on a weekly basis. These include inspections required by regulation for hazardous waste accumulation areas (<90 day areas), and inspections performed as best management practices for satellite accumulation areas, universal waste accumulation areas, and accumulation areas for used oil, used antifreeze, and lead acid batteries. A walk-through was conducted of the accumulation areas to verify compliance with requirements described in WP 02-RC3109, Attachments 1, 2, and 3. (e.g., condition of SAA containers, compatibility of waste with containers, and SAA container markings, as required by 40 CFR 262) The team verified compliance with the stated criteria.

Conclusion:

No concerns were identified during the surveillance. Based on interviews conducted and objective evidence examined, the results of the surveillance confirm that the requirements applicable to WTS Hazard Communication (HazCom) and Control of Hazardous Chemicals/Gases are effectively implemented and the programs achieve the desired results.

Surveillance Team Leader: Tamara D. Bowden
Tamara D. Bowden

Date: 10/04/12

Assistant Manager/Office Director: N/A

Date: _____

CBFO QA Director/Designee
Approval: Richard Farrell
Richard Farrell

Date: 10/09/2012