



108555 East Highway 36
Deer Trail, CO 80105

July 29, 2010

Jennifer T. Opila, MPA
Unit Leader
Radiation Management Unit
Hazardous Waste and Waste Management Division
Colorado Department of Public Health and Environment
4300 Cherry Creek Drive South
Denver, CO 80246-1530

RE: Compliance Inspection Report Dated 06/30/10

Via: Electronic Transmission and U. S. Postal Service

Dear Ms. Opila,

During a partial inspection of the Deer Trail facility on 06/30/10, three items of noncompliance were identified. This letter identifies corrective actions taken by the facility to address those items.

1. *Monthly ambient clean area radiation surveys and contamination surveys were not completed in January, February, March and April 2010 as required by the SOP on Routine Radiation Surveys.* The new Radiation Safety Officer (RSO) was not completely familiar with the current filing system. Contact with the previous RSO enabled us to locate those documents, which are on file and available for review. However, no routine surveys for the month of April could be located. Significant upgrades to the monthly routine survey element have been implemented beginning with the June, 2010 surveys.
2. *Truck Visual Inspection checklist incorrectly identified truck as clean on 6/30/10.* Employees whose job assignment may require inspection of a truck prior to release were briefed on the SOP on Regulated Waste Landfill Operations, section 6.3, Landfill Exiting Procedure for Trucks Transporting Regulated Waste. The briefing included instruction on proper completion of the Truck Visual Inspection checklist on the Exclusive Use Truck Survey Form. Documentation consists of a training roster, signatures of attendees and associated briefing materials.
3. *Radiation safety officer (Mr. Christman) did not receive General Employee Radiation Protection Training prior to work as required by SOP.* Mr. Christman completed the initial required training, "Basics of Radioactivity and Radiation", on 07/07/10. As the new RSO, Mr. Christman will be responsible for ensuring completion of required radiation safety training by appropriate personnel.

We believe that these actions adequately address the items identified during the inspection. If you have any questions, comments or need additional information, please contact me at (970) 386-2293, extension 223 or christman.clyde@cleanharbors.com.

Sincerely,

A handwritten signature in blue ink that reads "Clyde E. Christman". The signature is written in a cursive style with a large, prominent "C" at the beginning.

Clyde E. Christman
Radiation Safety Officer
Clean Harbors Environmental Services

Cc: Jack Kehoe
David Nielsen
Phil Retallick