

Region 9 Enforcement Division
75 Hawthorne Street
San Francisco, CA 94105
INSPECTION REPORT

Inspection Date(s):	07-29-2020	Inspection Announced: Yes	
Time:	Entry: 09:30 am	Exit: 11:02 am	
Media:	FIFRA		
Regulatory Program(s)	Use/Misuse Inspection		
Company Name:	GEO Group, Inc.		
Facility or Site Name:	Adelanto ICE Processing Center		
Facility/Site Physical Location:	10400 Rancho Rd. and 10250 Rancho Rd.		
(city, state, zip code)	Adelanto, CA 92301		
Geographic Coordinates:			
Mailing address:	10400 Rancho Road		
(city, state, zip code)	Adelanto, CA 92301		
County:	San Bernardino		
Facility/Site Contact:	James Janecka	Facility Administrator	
	jjanecka@geogroup.com		
	760-561-6100		
Facility/Site Identifier:	N/A		
Media Number:	N/A		
NAICS:	N/A		
SIC:	N/A		
Facility/Site Personnel Participating in Inspection:			
James Janecka	GEO Group	Facility Administrator	jjanecka@geogroup.com
Wilson Eaton	Young Law Group	Attorney	wilson@younglawms.com / 228-207-3276
Cheryl Wilke	GEO Group	Attorney	
Inspector(s):			
	{Signature}		
Timothy Hyles	US EPA / ENF-4-1	Inspector	hyles.timothy@epa.gov / 415-972-3801
Matt Salazar	US EPA / ENF-4-1	Enforcement Officer	Salazar.Matt@epa.gov / 415-972-3982
Additional Persons Participating in Inspection:			
Julie Jordan	US EPA	Federal Facilities Program Manager	Jordan.Julie@epa.gov / 415-947-4207

Brian Hughes	California Department of Pesticide Regulation	Special Investigator	Brian.Hughes@cdpr.ca.gov / 916-603-7741
Jose Bueno	California Department of Pesticide Regulation	Senior Environmental Scientist (Specialist)	Jose.Bueno@cdpr.ca.gov / 559-297-5423
Inspection Report Author:			
Timothy Hyles	{Signature}		
	US EPA / ENF-4-1	Inspector	hyles.timothy@epa.gov / 415-972-3801
Supervisor Review:			
Matt Salazar	{Signature}		
	US EPA / ENF-4-1	Manager, Toxics Section	Salazar.Matt@epa.gov / 415-972-3982

SECTION I – INTRODUCTION

Purpose of the Inspection and Authority to Inspect and Collect Records

The purpose of the inspection was to conduct an announced “for cause” inspection by video conference at the Adelanto ICE Processing Center to investigate allegations^{1,2,3} that GEO Group employees were applying HDQ Neutral, an EPA-registered pesticide (EPA registration # 10324-155-5741), in a manner that was making detainees experience illness symptoms, which included headaches, nausea, nosebleeds, fainting, eye irritation, skin irritation, and breathing issues. Specifically, EPA suspected that GEO Group employees at the Adelanto ICE Processing Center may be using HDQ Neutral in a manner inconsistent with its labeling, in violation of the Federal Insecticide, Fungicide, and Rodenticide Act (FIFRA) Section 12(a)(2)(G), 7 U.S.C. Section 136j(a)(2)(G).

FIFRA, 7 U.S.C. § §136- 136(y), authorizes EPA to require the registration of pesticides and to regulate the distribution, sale, and use of pesticides. The term “pesticide” includes disinfectants

¹ Da Silva, Chantal. June 3, 2020. “Over 250,000 Sign Petition to Stop ICE Using Powerful Disinfectant as Detainees Allegedly Suffer Serious Side Effects.” Newsweek. <https://www.newsweek.com/over-250000-sign-petition-stop-ice-using-powerful-disinfectant-detainees-allegedly-suffer-1508326>

² Plevin, Rebecca. June 27, 2020 (updated June 28, 2020). “Immigrants, advocates, members of Congress decry chemical use at ICE facility in Adelanto.” Desert Sun. <https://www.desertsun.com/story/news/politics/immigration/2020/06/27/immigrants-members-congress-decry-chemical-use-ice-facility-adelanto/3273095001/>

³ Nelson, Joe. July 7, 2020. “Congressman pushes for hearing into use of toxic disinfectant at Adelanto ICE center.” The Sun. <https://www.sbsun.com/2020/07/07/congressman-pushes-for-hearing-into-use-of-toxic-disinfectant-at-adelanto-ice-center/>

and sanitizers. In most instances, FIFRA provides for the states to have primary enforcement authority over pesticide use occurring within its boundaries. In this case, GEO Group denied the California Department of Pesticide Regulation (DPR) access to conduct an inspection resulting in DPR referring the matter to EPA for investigation. FIFRA Sections 26(c), 8(b), and 9(a), 7 U.S.C. §§ 136(c), 136f(b), and 136g(a), provide EPA with broad authority to inspect “any applicator who holds or applies pesticides or uses dilutions of pesticides to provide a service of controlling pests” and to require production of documents related to the holding and application of these pesticides.

Under normal circumstances (i.e. without Covid-19 restrictions), this inspection would have been conducted as an unannounced, in-person inspection at the Adelanto ICE Processing Center. However, due to health and safety concerns for EPA staff, GEO Group staff, and detainees, the inspection was conducted virtually, which necessitated giving advanced notice and scheduling the inspection. In general, a virtual inspection is done via video and/or phone conference to conduct interviews with facility staff and view the facility remotely as necessary. Email is used to transmit inspection forms and documents.

Opening Conference

I, Timothy Hyles, led an announced “for cause” virtual inspection of the Adelanto ICE Processing Center (hereafter referred to as Adelanto) via Microsoft Teams on July 29, 2020. Also in attendance from EPA were Matt Salazar and Julie Jordan. Two DPR inspectors were in attendance: Brian Hughes and Jose Bueno. Mr. James Janecka, Facility Administrator, represented GEO Group as the primary spokesman. Mr. Wilson Eaton, Attorney at Young Law Group, provided legal representation to Mr. Janecka. Ms. Cheryl Wilke, Attorney at GEO Group, was also in attendance. During the inspection, everyone except Mr. Eaton had their video cameras turned on and participants were asked to mute their microphones if not actively speaking. Mr. Eaton stated he was experiencing internet connectivity issues that prevented him from turning on his video camera. I agreed that this was okay.

I began by presenting my temporary Federal Credential, over video camera. My temporary Federal Credential was issued on July 17, 2020 and expires 90 days after issuance. Introductions of all in attendance followed. Matt Salazar presented his Federal Credential during the introductions.

I then explained the Notice of Pesticide Use/Misuse Inspection (EPA Form 3540-25) and how we were conducting a “for cause” inspection because EPA suspected that employees at the ICE Processing Center were suspected of using HDQ Neutral in a manner inconsistent with its labeling, in violation of the Federal Insecticide Fungicide and Rodenticide Act (FIFRA) Section

12(a)(2)(G), 7 U.S.C. Section 136j(a)(2)(G). A signature was not obtained on EPA Form 3540-25 during the inspection (Appendix 1) because Mr. Eaton advised Mr. Janecka not to sign.

At the beginning of the inspection, Mr. Eaton expressed two concerns. First, he wanted to make clear that he challenged DPR's jurisdiction to conduct an investigation or inspection at Adelanto regarding the use of HDQ Neutral. He also wanted to confirm that nobody in attendance would be recording the inspection. I confirmed that no recording would be taking place.

Next, I addressed some concerns that Mr. Eaton emailed to me the morning of the inspection (Appendix 2). The previous day, July 28, 2020, I had emailed three documents to Mr. Janecka and Mr. Eaton that were attached to the Microsoft Teams meeting invite: 1.) Notice of Pesticide Use/Misuse Inspection (EPA Form 3540-25), 2.) Receipt for Pesticide Use/Misuse Samples (EPA Form 3540-26), and 3.) A list of records I intended to request during the virtual inspection, which I had titled "Adelanto ICE Processing Center Virtual Inspection Records Requested." In my email, I stated that EPA inspection forms 3540-25 and 3540-26 would need to be filled out during the virtual inspection. I gave Mr. Janecka the option of signing and returning the forms to me prior to the inspection. Neither of the forms was signed prior to the inspection.

To address Mr. Eaton's concern about the documents being emailed on the previous day, I explained that I did this purely in the interest of saving time since the logistics of filling out these forms is more complicated at a virtual inspection. I stated that filling out the forms in advance was not required and made it clear that these forms would normally be filled out during inspection if we had been conducting the inspection in-person.

To address Mr. Eaton's concern that the scope of the inspection appeared to have expanded, I explained that EPA's jurisdiction under FIFRA extends to all pesticides, not only HDQ Neutral. I explained that EPA has authority to inspect and collect records for all pesticides being used at Adelanto and that my intention was to do so.

To address Mr. Eaton's concern about the lack of information provided as to the "samples" EPA intended to collect, I explained that "samples" on EPA Form 3540-26 includes such things as photos, records, and labels requested during an inspection, and did not necessarily mean that EPA intended to collect physical samples of any pesticides. I explained that EPA Form 3540-26 would normally be filled out at the end of the inspection with any records that were either provided during the inspection, or agreed to be provided after the inspection.

To address Mr. Eaton's concern about the ability to provide the list of records requested, I explained that it is not unusual for a company to request additional time to provide records that could not be quickly produced during the inspection. In particular, we discussed the issues

surrounding the request for medical records and the requirement to protect patient privacy under HIPAA. I stated that 10 business days seemed like a reasonable time to submit the non-medical records requested to EPA. Mr. Eaton stated that the records were undergoing internal legal review and none would be provided during the inspection. Mr. Eaton also stated that GEO Group might provide reasons that some of the records requested could not or would not be provided, but that they were willing to work with EPA to provide as many records as possible.

Mr. Eaton stated that any questions that extended beyond HDQ Neutral, or that pertained to the list of records requested undergoing legal review, would not be answered or produced during the inspection. I stated that I would still ask any questions that I originally intended to ask, and would document the answers even if Mr. Janecka declined to answer or was advised not to answer.

Facility/Site Description

The Adelanto ICE Processing Center is an immigration detention center with a capacity of approximately 1,940 detainees. According to GEO Group's website, Adelanto ICE Processing Center was purchased by GEO Group, Inc. in June 2010 from the City of Adelanto. On May 27, 2011, GEO Group entered into contract with U.S. Immigration & Customs Enforcement (ICE), through an intergovernmental service agreement with the City of Adelanto. The facility has two buildings that house detainees. Adelanto East is located at 10400 Rancho Road, Adelanto, CA 92301. Adelanto West is located at 10250 Rancho Road, Adelanto, CA, 92301.

SECTION II – OBSERVATIONS

During the inspection, I primarily interviewed Mr. Janecka and asked various questions. I have listed the conversation in question and answer format.

What disinfectants, sanitizers, or other products to control Coronavirus (SARS-CoV-2) are being used at the facility?

Mr. Eaton and Mr. Janecka stated, the scope of answers provided during the interview would be limited to HDQ Neutral. Matt stated for the record, EPA has authority to inspect and collect records under FIFRA for all pesticides, which includes disinfectants. Mr. Janecka answered, the facility uses HDQ Neutral, which is provided by Spartan Chemical Company.

Were there any reports of adverse health effects by detainees or staff after the applications of these products? If so, please describe.

Mr. Janecka declined to answer about detainees. He stated, there have not been any reports of HDQ Neutral causing adverse health effects to staff. *(At the time of the virtual inspection, EPA*

understood “staff” to mean detention Officers and not detainees who perform janitorial or cleaning work as part of the volunteer worker program. We are not clear if Mr. Janecka’s use of the word “staff” might also have been intended to refer to detainees participating in the volunteer worker program.)

What is the policy that staff or management are directed to follow when detainees become ill?

Mr. Janecka declined to answer.

Who is doing the applications?

Mr. Janecka stated, staff and detainees apply HDQ Neutral.

Which staff are doing the applications?

Mr. Janecka stated, primarily detention Officers and janitors.

In what areas are these disinfectants being applied within the facility? On what objects?

Mr. Janecka stated, HDQ Neutral is applied in the front lobby, admin areas, living areas, corridors, intake unit, and medical unit. He said it is sprayed on high-touch areas and is not used in areas where food is served.

How often are applications being done?

Mr. Janecka stated, approximately every 60 minutes in admin areas and approximately every 30-60 minutes in housing units and living areas.

Did the frequency of applications increase during the Covid-19 pandemic?

Mr. Janecka stated, yes, the frequency has increased.

How long has HDQ Neutral been in use at the facility?

Mr. Janecka stated, approximately 9 years. He has been at the Adelanto facility for 6 years.

What was the frequency of application prior to the Covid-19 pandemic?

Mr. Janecka stated, he was unsure of the frequency prior to the pandemic, but that it was used as needed.

At what dilution is HDQ Neutral being applied?

Mr. Janecka stated, HDQ Neutral is set to dispense at 2 ounces/gallon of water. The concentration is set by Spartan Chemical Company.

Did the facility increase the dilution applied during the Covid-19 pandemic?

Mr. Janecka stated, the concentration has always been 2 ounces/gallon of water. The facility is applying the HDQ Neutral to high touch areas in accordance to CDC guidance.

What was the HDQ Neutral being used for prior to the Covid-19 pandemic?

Mr. Janecka stated, HDQ Neutral has always been the primary disinfectant recommended for use at the facility.

At this point I paused questioning to discuss a concern. I mentioned that the product label for HDQ Neutral directs the user to apply the product at 1 ounce/gallon of water with a 10-minute contact time when used for general disinfection. Mr. Eaton pointed out that the label allows for up to 2 ounces/gallon of water for general deodorization and up to 4.5 ounces/gallon of water for animal premise disinfectant or animal virucidal uses. Julie pointed out that 4.5 ounces/gallon of water is only authorized when being used to kill Canine Parvovirus or Rabies Virus and that, when applied for this purpose, the label directs all animals be removed from the area prior to treatment. I pointed out that Mr. Janecka had already stated that HDQ Neutral was currently being used for disinfection to prevent the spread of Covid-19 and that it was EPA's position that GEO Group should be applying HDQ Neutral at 1 ounce/gallon of water rather than 2 ounces/gallon of water. I then continued asking questions.

How is HDQ Neutral being applied? Using what application method?

Mr. Janecka stated, HDQ Neutral is delivered to Adelanto in 5-gallon buckets of concentrated disinfectant, which are then connected to dispensing equipment that automatically mixes and dilutes the HDQ Neutral to the specified setting, which is 2 ounces/gallon of water. Spartan Chemical Company installed this dispensing equipment at various locations throughout Adelanto. The dispensing equipment is kept locked behind cages, which are further locked behind janitorial closet doors. The diluted HDQ Neutral solution is dispensed into either 32-ounce spray bottles or manual spray pump containers, like the ones people use to spray weeds around their homes, with a capacity of 1-1.5 gallons. HDQ Neutral is applied as a light mist.

Is HDQ Neutral being allowed to air dry or is it being wiped up?

Mr. Janecka stated, staff will either wipe up the spray with a paper towel or allow it to air dry.

How often does Spartan Chemical Company visit the facility?

Mr. Janecka stated, Spartan comes out approximately monthly.

Has Spartan Chemical Company found any issues with the dispensing equipment?

Mr. Janecka stated, Spartan has not notified the facility of any issues with the equipment.

When was Spartan Chemical Company's last visit?

Mr. Janecka stated, the company last visited the first or second week of June 2020.

What does Spartan Chemical Company do during their visits?

Mr. Janecka stated, they calibrate and look for issues with the dispensing equipment. He understands that they perform a systems check to make sure the dispensing equipment is working properly and that the proper dilution is being dispensed.

What steps are being taken to ensure these products are being applied according to label directions?

Mr. Janecka stated, all staff and new hires go through training using training materials provided by Spartan Chemical Company. He mentioned “hazard communication” training and a PowerPoint or video called “Stop the Spread”. Shift briefings are also used to pass on information. Some trainings are quarterly and some are annual. Staff are shown the Safety Data Sheets for HDQ Neutral. There is a “safety notice” posted in various places around the facility, in English and Spanish, with information about how to use HDQ Neutral. Management also quizzes staff about how to safely apply the disinfectant.

I asked Mr. Janecka if he would provide me with a copy of the safety notice for HDQ Neutral and added this to my list of records requested. Mr. Janecka agreed the safety notice could be provided.

Are staff given training in mixing or applying HDQ Neutral?

Mr. Janecka stated, staff doesn’t mix HDQ Neutral. The entire 5-gallon bucket of concentrated disinfectant is connected at the bottom of the dispensing equipment and the machine does everything else based on the settings.

What Personal Protection Equipment (PPE) are staff given during mixing or application?

Mr. Janecka stated, all staff are given nitril gloves, masks, and safety goggles.

What PPE are detainees given?

Mr. Janecka stated, detainees are given surgical masks three times per week, nitril gloves, and have access to safety goggles that are kept inside a closet.

Are detainees required to wear PPE?

Mr. Janecka stated, detainees are encouraged, but not required, to wear PPE.

Are staff required to wear PPE?

Mr. Janecka stated, staff are required to wear PPE, but not required to wear the safety goggles.

Are detainees present during the application of HDQ Neutral?

Mr. Janecka stated, detainees are present in the general areas during application. He explained that Officers do security checks of the day-use areas every 30 minutes where they will wipe down or spray high-touch areas, like door knobs. He described the day room as a large open

room with tables, a bank of 12 telephones along the wall with privacy screens. The kitchenette has a sink and a microwave. There is a legal kiosk and a staircase. He mentioned HDQ Neutral is sprayed on staircase handrails as a light mist or sprayed on a paper towel and then wiped. Staff will skip tables or phones currently being used by detainees. They will also skip the adjacent phone on each side of a detainee. They will skip an area if there are detainees sitting on the floor below (for example at a table). They don't spray the inside of cells or bunks. If HDQ Neutral is wiped up, instead of air dried, it is wiped after a 10-minute contact time.

Which application equipment is used in different parts of the facility?

Mr. Janecka stated, living areas are sprayed with the 32-ounce spray bottles, which has a user-prepared label attached. The intake area, which are large holding rooms, are sprayed with the 1-1.5 gallon spray pump containers. The intake areas hold 32-36 people and have benches inside. The 1-1.5 gallon sprayers are not used if detainees are present. Detainees are not allowed to use the 1-1.5 gallon sprayers.

Are electrostatic sprayers being used to apply HDQ Neutral?

Mr. Janecka stated, electrostatic sprayers are not used.

If not present, how long after applications are detainees brought back into a treated area?

Mr. Janecka stated, if an unoccupied area is sprayed, staff will primarily wipe down the area after a 10-minute contact time before detainees are let back inside. In the evening they may let the spray air dry.

Are detainees given advanced notice before disinfectants are applied?

Mr. Janecka stated, advanced notice is not given.

Who is responsible for purchasing HDQ Neutral?

Mr. Janecka stated, purchasing occurs locally through the business office's warehouse supervisor. The warehouse supervisor tracks the inventory and purchases as necessary.

Are detainees given disinfectants for personal use?

Mr. Janecka stated, detainees can request to use HDQ Neutral and take 32-ounce bottles to use in their living areas. They are not required to use the disinfectant. Detainees may also use 32-ounce bottles of HDQ Neutral during the volunteer work program.

Are detainees given training in how to use HDQ Neutral?

Mr. Janecka stated, detainees that sign up to be volunteer workers go through training for how to safely use HDQ Neutral. They have access to the labels and Safety Data Sheets. Volunteer workers do janitorial work, for pay, where they are authorized to clean and apply HDQ Neutral. The Safety Data Sheets, user-prepared labels, and "safety notice" are available to the detainees in the living areas. Detainees never have access to the concentrated chemical without staff

supervision and can only attach the 5-gallon buckets to the dispensing equipment under staff supervision.

Has Spartan Chemical Company found any issues with the dilution equipment?

Mr. Janecka stated, to his knowledge Spartan hasn't found any issues with the equipment. He has never done a walkthrough with Spartan during their visits.

How long have you had a contract with Spartan Chemical Company to purchase and use HDQ Neutral?

Mr. Janecka stated, at least 9 years.

Are any other chemicals besides HDQ Neutral dispensed from the dilution equipment?

Mr. Janecka declined to answer.

Can you give us a virtual tour of the facility and show us how HDQ Neutral is applied?

Mr. Eaton stated, the question would need to be raised with ICE before we could be shown around the facility.

This concluded my prepared questions. Julie then asked, are the nozzles on the 1-1.5 gallon spray bottles are adjustable? Mr. Janecka stated, he thinks they are adjustable. He said he would check and get back to us.

Closing Conference

I brought up the list of records requested once more and noted that I had added an additional request to the list to include a copy of the "safety notice" for HDQ Neutral that Mr. Janecka stated is posted around the facility. I stated that 10 business days seemed like a reasonable time frame for the records to be submitted to EPA, acknowledging that medical records could take additional time and effort to acquire.

Mr. Eaton again stated that the records request was undergoing legal review, that some records may take longer than 10 business days to acquire, and that some records may be difficult to produce because it may require copying a very large volume of documents that contain confidential and/or personally identifiable information.

I stated that we may want to interview detainees and other staff, but that we would let them know.

No records were collected during the virtual inspection and the Receipt for Pesticide Use/Misuse Samples (EPA Form 3540-26) was not completed (Appendix 3).

SECTION III – AREAS OF CONCERN

Regulatory Concerns

1. HDQ Neutral is being diluted and applied at 2 ounces/gallon of water for disinfection when the label directs the applicator to apply the product at 1 ounce/gallon of water for general or broad spectrum disinfection. It appears that HDQ Neutral is being overconcentrated for the intended use. [FIFRA Section 12(a)(2)(G), 7 U.S.C. Section 136j(a)(2)(G)].
2. Not all applicators are wearing PPE while HDQ Neutral is being applied. Detainees are not required to wear gloves, facemasks or safety goggles, while Adelanto staff are required to wear gloves and facemasks, but not safety goggles.

The HDQ Neutral label's Precautionary Statements (Appendix 7) directs the user "Do not get in eyes, on skin, or on clothing. Wear goggles or face shield and chemical resistant gloves and protective clothing when handling." The HDQ Neutral User-Prepared Ready-to-Use Solution label (Appendix 9, downloaded from Spartan Chemical Company's website) contains the same language.

It is not clear how well detainees can avoid exposure to their eyes, skin, or clothing if they happen not to be wearing PPE during nearby applications by staff or detainees.

3. GEO Group may not be taking sufficient steps to ensure detainees do not breathe HDQ Neutral when it is being applied because detainees are not required to wear facemasks during applications. During the interview, Mr. Janecka stated that HDQ Neutral was being applied by Officers as frequently as every 30 minutes. Although the HDQ Neutral label does not require the use of a facemask or respirator, the label's Directions for Use (Appendix 7) under FOR USE AS A ONE-STEP, GENERAL, HOSPITAL DISINFECTANT, FUNGICIDE, VIRUCIDE*, DEODORIZER, CLEANER, directs the user "Do not breathe spray."

The HDQ Neutral User-Prepared Ready-to-Use Solution label (Appendix 9), under Precautionary Statements, says "Harmful if swallowed, inhaled or absorbed through the skin. Avoid breathing spray mist."

The HDQ Neutral Safety Data Sheet (Appendix 7), provides information about avoiding exposure under Engineering Controls, where it states "Provide good general ventilation. If work practices generate dust, fumes, gas, vapors or mists which expose workers to chemicals above the occupational exposure limits, local exhaust ventilation or other engineering controls should be considered."

It is not clear how well detainees can avoid exposure to their respiratory system if they happen not to be wearing a facemask during nearby applications by staff or detainees. It is not clear whether or not Adelanto has sufficient ventilation to handle such frequent spraying of HDQ Neutral.

SECTION IV – DOCUMENTS REQUESTED AFTER THE INSPECTION

I emailed an updated list of records requested to Mr. Eaton and Mr. Janecka on July 31, 2020 (Appendix 4). I stated that the due date was August 12, 2020 by the end of the day.

Records were not received until August 26, 2020. The response include a letter from Mr. Eaton (Appendix 5) along with eight attachments. Five of the eight attachments made claims of FIFRA Confidential Business Information (CBI) and are thus not included in this report. The three attachments that were not claimed as FIFRA CBI are included as Appendices 6, 7, and 8.

SECTION V – LIST OF APPENDICES

Appendix 1 – Notice of Pesticide Use/Misuse Inspection (EPA Form 3540-25)

Appendix 2 – Pre-inspection email from Mr. Eaton

Appendix 3 – Receipt for Pesticide Use/Misuse Samples (EPA Form 3540-26)

Appendix 4 – Updated list of records requested

Appendix 5 – Records requested response letter from Mr. Eaton

Appendix 6 – Photos of HDQ Neutral containers

Appendix 7 – HDQ Neutral label, Safety Summary Sheets, and Safety Data Sheet

Appendix 8 – HDQ safety notice posting

Appendix 9 – HDQ Neutral user-prepared label