

February 7, 2019

State of Washington, Public Disclosure Commission  
ATTN: Philip Stutzman, Sr. Compliance Officer  
via email: phil.stutzman@pdc.wa.gov

RE: Response to Complaint Against UA Local 598 et al. (Iron Mountain Management, Case 43690)

Dear Mr. Stutzman,

Please accept this letter as our response to the complaint against UA Local 598 et al. (Iron Mountain Management, Case 43690).

I am the president of Iron Mountain Management, LLC; we are a project administration and project management company based in Richland, Washington. We help companies accomplish their goals when we apply our fresh, outsider perspective and offer honest, innovative, expert advice to solve their challenges. We are a certified woman business enterprise through the Washington State Office of Minority and Women's Enterprises, we are an economically disadvantaged woman owned small business through the U.S. Small Business Administration, and we work with our local building trades unions as a signatory contractor to the Hanford Site Stabilization Agreement.

On December 12, 2018, I received notification that my company was named in the complaint that Mr. Nelsen filed with the Public Disclosure Commission. In my email to you on January 8, 2019, I informed you that I have one employee who is a member of UA Local 598, Jason Sprowl.

Mr. Sprowl signed new hire paperwork on February 16, 2018; his first day of work on our client's worksite (Mission Support Alliance on the Hanford site) was February 27, 2018. Under RCW 42.17A.495 and WAC 390-17-100, the annual notice is due no later than June 1st each year. Considering Mr. Sprowl's hire date, was an annual notice required during calendar 2018? Should the annual notice for employees hired between January 1st and June 1st be provided on the employee's anniversary of their hire date?

At the time Mr. Sprowl was hired, I was unaware of the obligation to comply with RCW 42.17A.495 and WAC 390-17-100. I was simply trying to comply with the Hanford Site Stabilization Agreement and UA Local 598 Labor-Management Agreement. After receiving the complaint, I discovered that the dispatch notice and offer letter were not compliant. This is the first time that I've encountered this issue. I would suggest that my ignorance of the notice requirements would be understandable considering the absence of mention of the notice requirements in the Hanford Site Stabilization Agreement and UA Local 598 Labor-Management Agreement. Therefore, on December 21, 2018, I sent Mr. Sprowl an email with a memo providing annual notice and a political contribution withholding form; he returned the signed authorization.

In reviewing your letter of February 4, 2019, it appears that the forms used to notify Mr. Sprowl on December 21, 2019, do not meet your approval. I will work with Mr. Barton to further develop compliant forms for use in the future. Once those forms are compliant, we will provide them to

Mr. Sprowl and update our employee handbook. Alternately, if UA Local 598 is willing to send the annual notice and commits to sending me copies of the initial authorization and annual notices, I would gladly accept their support to help me maintain compliance.

Our intent is to comply with all applicable local, state, and federal laws and the terms and conditions of the agreements we sign. While we unintentionally accepted a non-compliant authorization, we revised our employee handbook (to include a notice of political contribution withholding form) and our annual notice of political contribution withholding form to come into compliance. Our onboarding checklist now also includes a checklist item to add a calendar reminder to send the annual notice of political contribution withholding form to affected employees by January 1 each year.

Attached you will find

- Mr. Sprowl's offer letter (signed February 16, 2018)
- memo sent to Mr. Sprowl providing annual notice and political contribution withholding form (signed December 31, 2018)
- revised pages from our employee handbook
  - notice of political contribution withholding form
  - onboarding checklist
- annual notice of political contribution withholding form

I'm hopeful that UA Local 598 sent you Mr. Sprowl's dispatch notice; if not, please let me know and I will send it to you. We remain committed to compliance and working with your office in good faith. We welcome the PDC's feedback on the revised pages from our employee handbook and annual notice of political contribution withholding form. If you have any questions or need additional information, please contact me at 509.946.3999 or [meghan.chalk@goironmountain.com](mailto:meghan.chalk@goironmountain.com).

Thank you,



Meghan Chalk, President  
Iron Mountain Management, LLC