

START 9513388.1067



Department of Energy
Richland Field Office
P.O. Box 550
Richland, Washington 99352

JUN 02 1993

93-RPA-226



Mr. David C. Nylander, Manager
State of Washington
Department of Ecology
7601 West Clearwater Avenue, Suite 102
Kennewick, Washington 99336

Dear Mr. Nylander:

RESPONSE TO ENFORCEMENT RECOMMENDATION REGARDING ETHYLENE GLYCOL DISCHARGE FROM BUILDING 309E TO THE 300 AREA PROCESS TRENCH

On May 12, 1993, Mr. Steve Moore of your staff forwarded a letter to the U.S. Department of Energy, Richland Operations Office (RL) and Westinghouse Hanford Company (WHC) regarding an enforcement recommendation prepared in response to the discharge of ethylene glycol from the 309E Building to the 300 Area Process Trench. In the same letter, Mr. Moore requested completion of three specific actions. A response to each of these actions follows: 27956

Action 1:

Within twenty-one (21) days of receipt of this letter, RL and WHC should modify or eliminate restrictive procedures for notification, put in place procedures that authorize facilities on Hanford responsible for DW discharges to immediately report to Ecology and other applicable authorities, and provide Ecology with copies of the new procedures.

Response:

The State of Washington Department of Ecology (Ecology) was notified of the ethylene glycol release approximately six hours after the release occurred. The Hanford Occurrence Notification Center (ONC) followed the established procedure in reporting this incident (i.e., waiting until the start of Ecology's normal business hours to notify Ecology of the release). This procedure was consistent with a letter from RL to the State of Washington Department of Community Development, Division of Emergency Management, which specified that oral notifications by RL would be made during the normal business hours (Letter, J. R. Hunter to E. Ackerman, "Notification Matrix for Occurrence Reporting," dated February 20, 1991). ✓



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In a letter from L. Russell (Ecology) to J. D. Bauer (RL), dated May 12, 1993, Ecology notified RL of its new procedure for reporting after-hour emergencies. In response to the concern expressed in your investigation the ONC's procedures to providing Hazmat Release/Spill Notifications (WHC-IP-0858, Section 3.0-B, Revision 4) have been revised to require immediate (within two hours) notification to Ecology in the event of a reportable release of a hazardous material that poses a threat to human health or the environment. A copy of this procedure is attached.

The ONC will continue to be the only organization at the Hanford Site to provide Ecology with formal spill/release notifications. Requirements and procedures are in place at the Hanford Site for notification of the ONC in the event of a release of a hazardous material.

Action 2:

Within twenty-one (21) days of receipt of this letter, RL and WHC should modify or eliminate restrictive internal procedures used to clear requested documents. Procedures should be put in place that authorize appropriate individuals on Hanford responsible for DW management, storage, treatment, disposal, or other activities regulated by outside agencies or authorities to provide records to outside regulatory authorities, when requested, when the regulator is acting within the scope of their statutory authority. Copies of the new procedure should be provided to Ecology.

Response:

Per the requirements of DOE Order 1430.1C, "Management of Scientific and Technical Information," and DOE Order 1430.2B, "Scientific and Technical Information Management Program," RL and its contractors must review any information provided to the public, including regulatory agencies, to assure that classified or sensitive information is not released. Document clearance processes have been established to maintain compliance with these DOE Orders and to assure information is properly reviewed prior to release.

Improving and streamlining the document clearance process is an ongoing effort. For instance, regulatory files are being set up at a number of facilities. These regulatory files include information that has already been cleared by RL and can be provided to a regulator immediately upon request. However, any information that is not part of existing regulatory files must be processed using existing clearance procedures.

Mr. David C. Nylander
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Action 3:

RL, Ecology, and EPA unit managers should immediately meet to determine impacts to in-progress actions like the recent CERCLA Expedited Response Action, planned CERCLA clean up of the process trenches, construction of a 300 Area treatment facility, and Hanford Federal Facility Agreement and Consent Order (HFFACO) milestones (past, present and future) and Consent Order DE-91NM-177.

Response:

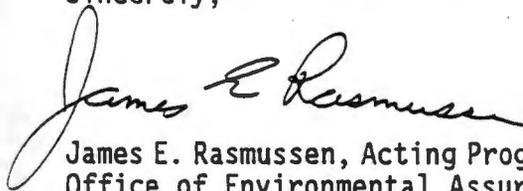
Attempts to reach EPA and Ecology 300 Area Unit Managers were initiated the afternoon of May 13, 1993. On May 14, 1993, a meeting was held to discuss future and ongoing actions to respond to the ethylene glycol release. The 300 Area Process Trenches Unit Managers from Ecology, EPA, and personnel from Pacific Northwest Laboratories, RL, and WHC were present at the meeting. As a result of this meeting, WHC is evaluating the potential for similar spills in other facilities.

The 300-FF-1 and 300-FF-5 Unit Managers discussed the potential impacts of the ethylene glycol discharge on the 300-FF-1 and 300-FF-5 Operable Units at the 300 Area Unit Manager's meeting held on May 27, 1993. The potential impacts concerning the discharge to groundwater will be discussed further as more data becomes available.

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Should you have any questions regarding this transmittal, please call Mr. A. E. Teimouri, RL, on 376-6222, or Mr. E. M. Greager, WHC, on 376-3132.

Sincerely,



James E. Rasmussen, Acting Program Manager
Office of Environmental Assurance
Permits, and Policy

EAP:AET



R. E. Lerch, Deputy Director
Restoration and Remediation
Westinghouse Hanford Company

Enclosure

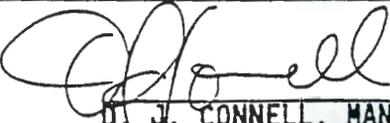
cc w/encl:

~~H. G. Erlandson, WHC~~
E. M. Greager, WHC
G. W. Jackson, WHC

WHC-IP-0858
WESTINGHOUSE HANFORD COMPANY
OCCURRENCE NOTIFICATION CENTER
DESK TOP INSTRUCTIONS

SECTION 3.0-A, REV 4
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MAY 11, 1993

UNUSUAL OCCURRENCE/OFF-NORMAL DUTIES
ORAL OFFSITE AGENCY NOTIFICATIONS


D. J. CONNELL, MANAGER

1.0 INTRODUCTION

The purpose of this desk top instruction is to provide detailed guidance to the ONC staff in completing and documenting oral notifications for unusual (UO) and off-normal occurrences. This includes the required conference call to Department of Energy (DOE) Headquarters (DOE-HQ), notification to offsite agencies, and individual notifications, including press releases. The oral notification requirements listed below include those from DOE Order 5000.3A, MRP5.14, and agreements between DOE and various offsite agencies.

2.0 SCOPE

This desk top instruction is for use by ONC personnel only.

3.0 PROCEDURE

1. The ONC duty officer receiving notification of an unusual occurrence during business hours (800-1600 hours, daily) will complete the following notifications and followup documentation:
 - a. If the original UO call was not from the Facility Manager, ensure he/she is advised of the occurrence, and is aware of the conference call requirement within two hours of event categorization. Establish a telephone number for the conference call.
 - b. Advise the Emergency Duty Officer (EDO) of the occurrence, and complete requested notifications (i.e., WHC Media Relations, if there are offsite implications--refer to the Hanford Site Weekly On-Call Directory).
 - c. Advise the affected RL Facility Representative of the occurrence, and ensure he/she is aware of the two hour conference call requirement. Establish a telephone number for the conference call.
 - d. When the Facility Manager and the RL Facility Representative have agreed upon a time for the call, complete the conference call (within 2 hours for all UOs) by following the Desktop Instruction 12.0-E, "Establishing Conference Call".
 - e. Complete the ONC Conference Call Log during or following the conference call. Ensure all information requested is complete.

NOTE: The conference call time is considered to be the precise time that DOE-HQ EOC answers the phone.

- f. Immediately following the conference call, notify the DOE-HQ Onsite Representative of the UO information. The numbers are listed in

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appendix A. This call will be made on a 24-hour basis. Log the call in the ONC Communications Log.

Note: The exception to waiting until after the conference call, is immediate notification of events involving CERCLA reportable quantities of hazardous material as specified by the Environmental Compliance personnel.

- g. Complete notifications to the following offsite agencies within two (2) hours of DOE-HQ EOC conference call completion and DOE-HQ Onsite Representative notification - unless the event involves a CERCLA reportable quantity of hazardous material. (see appendix A, Offsite Agencies Notification List):

- Washington State Department of Ecology (WDOE)
- Washington State Department of Health (WDOH)
- Oregon Department of Energy (ODOE)
- Environmental Protection Agency (EPA)

Note: If the event is a UO and CERCLA reportable, notify WDOE only once (i.e. a call to WDOE will be made immediately after the Environmental Compliance person requests notification to the NRC).

- g. Notifications to offsite agencies can include any information contained in the information log, BOP macro, and unofficial or official copies of the occurrence report, with the exception of names or telephone numbers of contractor personnel and classified matter. If there are further questions, the ONC duty officer will either provide the offsite agency with the work telephone number of the affected RL Facility Representative/Designee; or contact RL and request they call the offsite agency. These RL contacts shall be done on as "as needed" basis--only work telephone numbers will be utilized.

NOTE: Whenever possible, follow telephone instructions during a "UO" call and attempt to relay the message to a person. If no contact can be made, leave a message to that effect following the "UO" message. Normally, any offshift "UO" message is relayed the next business day.

- h. Complete the State Oral Notification Log, ensuring all information requested is complete, including the date, time, and name of each person notified.

NOTE: If the occurrence (UO or off-normal) involves a hazardous spill or environmental release, a minimum of one additional offsite notification is made to WDOE, at the direction of the affected Environmental Protection (EP) representative. For convenience, the WDOE contact for spills/releases is listed in appendix A. See section 3.8 for the procedure on reporting/documenting spills/releases.

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of occurrence-related press releases concurrent with their release.

4. The ONC duty officer shall log all press release notifications in the State Oral Notification Log.
5. The ONC duty officer shall update the ONC Communications Log.
6. If any ADC classification concerns exist, the ONC duty officer shall notify the WHC Classification Office prior to making any offsite agency notifications. During off-shift hours, the Security Duty Officer (SDO) shall be contacted.

NOTE: Line management (i.e., Originators/Facility Managers) are responsible to ensure that no classified or Unclassified Controlled Nuclear Information (UCNI) are contained in verbal reports provided to the ONC. The ONC provides an extra safeguard to ensure no classified information is released offsite.

4.0 APPENDICES

1. Appendix A Offsite Agencies Notification List

WHC-IP-0858
 WESTINGHOUSE HANFORD COMPANY
 UNUSUAL OCCURRENCE/OFF-NORMAL DUTIES
 ORAL OFFSITE AGENCY NOTIFICATIONS

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Appendix A

OFFSITE AGENCIES NOTIFICATION LIST

TELEPHONE NUMBERS FOR OFFSITE ORAL NOTIFICATIONS:

1. DOE-HQ ONSITE REPRESENTATIVE: AMI B. SIDPARA
 372-2155 (WORK)
 NOTE: CALL IMMEDIATELY AFTER CONFERENCE CALL, 783-1938 (HOME)
 24-HOURS A DAY (LOCAL CALL) 85-8989 (PAGER)

- ALTERNATE DOE-HQ ONSITE REPRESENTATIVE: ROBIE L. MONROE
 372-3523 (WORK)
 627-5319 (HOME)
 85-9424 (PAGER)

2. OREGON "UO" AND PRESS RELEASES (WORKING HOURS): 88-503-378-5544
 MARY LOU BLAZEK

- ALTERNATES: DAVID STEWART-SMITH 88-503-378-4040
 BOB ROBISON 88-503-378-3194
 RALPH PATT 88-503-378-8456
 WILLIAM SANDERSON 88-503-378-4129
 JANET FRANCO 88-503-378-3187

- * OREGON OFF-SHIFT PRESS RELEASE NOTIFICATION: 88-503-373-2785
 (PAGER NUMBER--ENTER THE ONC NUMBER AND HAVE
 THE DUTY OFFICER CONTACT BLAZEK OR ALTERNATE.) ODOE DUTY OFFICER

3. ENVIRONMENTAL PROTECTION AGENCY 376-6623
 "UO" AND PRESS RELEASES (NO OFF-SHIFT NUMBER) PAUL T. DAY (WORK)

- ALTERNATE NUMBER FOR EPA 376-6865
 AUDREY D. DOVE (WORK)

4. WASHINGTON ECOLOGY "UO" AND PRESS RELEASES: 735-7581 (LOCAL)
 THOMAS TEBB

- ECOLOGY OFF-SHIFT PRESS RELEASE NUMBER:
 *735-7581 WILL TRANSFER TO ANSWERING SERVICE
 DURING OFFSHIFT HOURS--REQUEST PHONE CALL.

5. WASHINGTON HEALTH "UO" AND PRESS RELEASES: 88-206-586-0254
 AL CONKLIN (WORK)

- HEALTH OFF-SHIFT PRESS RELEASE NUMBER: 88-206-493-0328
 AL CONKLIN (HOME)

- ALTERNATE NUMBER FOR DEPT. OF HEALTH: 88-206-586-3306
 JOHN ERICKSON (WK)

- ALTERNATE OFF-SHIFT PRESS RELEASE NUMBER: 88-206-786-5090
 JOHN ERICKSON (HM)

9513388.1074

0027956



9303751B

STATE OF WASHINGTON
DEPARTMENT OF ECOLOGY

7601 W. Clearwater, Suite 102 • Kennewick, Washington 99336 • (509) 546-2990

May 12, 1993

CERTIFIED MAIL

Mr. John Wagoner, Manager
U.S. Department of Energy
Richland Operations Office
P.O. Box 550
Richland, Washington 99352

EPA/State
ID Number: (WA7890008967)

Date and Time of Inspection:
April 30, 1993 0900-1400 hours



Mr. Tom Anderson, President
Westinghouse Hanford Company
P.O. Box 1970
Richland, Washington 99352

Dear Messrs. Wagoner and Anderson:

Re: Ethylene Glycol Discharge from Building 309E to the 300 Area Process Trench

On April 30, 1993, I responded to a reported discharge of ethylene glycol from Building 309E (309E) to the 300 Area process trench. I am preparing an enforcement recommendation to Department of Ecology (Ecology) management that will be based on findings from my investigation of the discharge. I want to ensure that both Department of Energy (DOE-RL) and Westinghouse Hanford Company (WHC) are aware of my preliminary concerns from the investigation. This early notification is intended to provide prompt and open communication which may lead to voluntary correction of deficient conditions. Positive action in response to this letter on your behalf may enable me to lessen the severity of any enforcement recommendation I make to Ecology management after completion of my investigation. My preliminary assessment of the discharge event follows:

A leak of 38% ethylene glycol solution from the 309E cooling system was identified at approximately 0125 hours on April 30, 1993 by WHC. Emergency response was initiated and clean-up efforts began inside 309E promptly. At approximately 0200 hours, the IEM sump automatic sump pump in building 309E was turned off. The sump had collected leaked material and the sump pump was discharging the material to the 300 Area

Messrs. Wagoner and Anderson
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process sewer. At approximately 0345 hours, green water was observed in the process trench weir which indicated an ethylene glycol content in the water. Liquid samples from the weir were taken at approximately 0615 hours. Ecology was notified of the spill at 0815 hours by the WHC Occurrence Notification Center (ONC) that approximately 400 gallons of ethylene glycol solution was spilled from the cooling system, that 90 gallons had been retrieved, and that there was potential discharge to the 300 Area process trenches above the CERCLA reportable quantity. Casey Ruud and I responded to the discharge report because there was nearly a seven hour delay in notification, and uncertainty of the environmental impact in the ONC report.

On May 11, 1993, Mr. Bill Retterer (WHC) informed me that approximately 795 gallons of 38% ethylene glycol solution were discharged to the process sewer from 309E. Mr. Retterer also reported laboratory results from samples taken from various points were received and conflicted with field analysis performed on the samples using a hydrometer. The hydrometer results indicated the cooling system contained 38% ethylene glycol. The laboratory results indicated 19% or less ethylene glycol. Mr. Retterer reported that groundwater monitoring wells around the process trenches were sampled on May 8, 1993 and that Battelle-Pacific Northwest Laboratories (PNL) was attempting to acquire an appropriate blank for analysis. He said PNL had obtained "small levels, very close to non-detectable" using Zerex brand automotive anti-freeze and the ethylene glycol used in the 309E cooling system, but he was unable to provide actual values for the groundwater samples.

The process used to determine discharge quantity and the sampling and analysis performed will be presented to Ecology on May 13, 1993 for review.

As discussed with DOE-RL and WHC representatives during my investigation, and subsequent conversations, there are several areas of non-compliance with the Washington State Dangerous Waste Regulations (Chapter 173-303 WAC) which need to be resolved.

Additionally, the impact of the discharge on the CERCLA cleanup of the process trenches and compliance with Consent Order DE-91NM-177, WAC 173-200 (Water Quality Standards for Ground Waters of the State of Washington), and WAC 173-216 (State Waste Discharge Permit Program) are yet to be determined.

My recommendation to Ecology management for formal enforcement will be influenced by the adequacy of the on-going assessments of waste quantity and environmental impact and the DOE-RL and WHC response to this compliance letter.

Messrs. Wagoner and Anderson
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Preliminary violations (violation), problem discussions (discussion), and recommended corrective actions (action) are included below to facilitate resolution:

ITEM 1

Violation:

WAC 173-303-145 (2) Notification. WHC was aware of the Dangerous Waste discharge to the environment by 0200 hours on April 2, 1993. Ecology was notified at 0815 hours. Notification of a discharge that threatens human health or the environment is required to be done immediately.

Discussion

Established DOE-RL orders and WHC notification procedures reportedly prevented immediate notification of the discharge to Ecology. DOE-RL orders and WHC procedures do not provide relief from statutory reporting requirements when there is conflict between them. The requirements of WAC 173-303-145 apply because ethylene glycol is a dangerous waste (DW), it was discharged into the environment, and there is a potential threat to the environment due to the discharge. DOE-RL and WHC did (do) not know the extent of the spill or discharge. No actions were taken to prevent the discharge from the process sewer to the process trench. No actions were taken to retrieve material discharged to the environment. When an assessment of the threat from a discharge cannot be made, or mitigation does not occur, a threat must be assumed until proven otherwise and the discharge must be immediately reported.

Action 1:

Within twenty-one (21) days of receipt of this letter, DOE-RL and WHC should modify or eliminate restrictive procedures for notification, put in place procedures that authorize facilities on Hanford responsible for DW discharges to immediately report to Ecology and other applicable authorities, and provide Ecology with copies of the new procedures. Immediate reporting to Ecology of a DW discharge on Hanford will be satisfied if the report is received by Ecology within two (2) hours after discovery of the discharge. Failure to meet this condition may result in citation for failure to report a non-permitted DW discharge.

ITEM 2

Violation:

WAC 173-303-210 (6) Ecology requested and was denied access to information necessary to assess a reported discharge of potentially large quantities of a dangerous waste to the environment.

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Discussion:

During my investigation of the discharge to the 300 Area process trenches, copies of several documents and records were requested. The emergency response and reporting procedures used by DOE-RL and WHC to respond to the discharge were requested. Copies of some of the records were provided to me after determination that they did not require processing through the DOE-RL and WHC clearance procedures by Mr. Rob Hastings (DOE-RL, Facility Representative) and Mr. Greg Henrie (WHC, RCRA Compliance Support) who were assisting with my investigation. The emergency procedures were not provided as requested. Mr. Brad Erlandson (WHC, Manager Regulatory Field Support) explained the emergency procedures would require clearance because of WHC policy and DOE-RL orders. I informed Mr. Erlandson of the specific authority under which I was making the request, the relationship between the requested documents and the discharge, and my interpretation that there was no justification for denial to the requested records. When my request was again denied, I explained that failure to provide the requested records would be considered a denial of access to those records in my investigation report.

Action 2:

Within twenty-one (21) days of receipt of this letter, DOE-RL and WHC should modify or eliminate restrictive internal procedures used to clear requested documents. Procedures should be put in place that authorize appropriate individuals on Hanford responsible for DW management, storage, treatment, disposal, or other activities regulated by outside agencies or authorities to provide records to outside regulatory authorities, when requested, when the regulator is acting within the scope of their statutory authority. Copies of the new procedures should be provided to Ecology.

Item 3

Violation:

Violations of HFFACO, Consent Order DE-91NM-177, or water quality regulations have not been determined pending investigations by appropriate unit managers responsible for 300 Area and process trench issues.

Observation:

DOE-RL, Ecology, and the Environmental Protection Agency (EPA) have expended significant energies in recent years to identify 300 Area waste streams, reduce 300 Area process waste volume, perform interim measures to minimize the impact of continued discharge to the process trenches until treatment is available, and to upgrade existing 300 Area facilities. These efforts did not successfully prevent this discharge of potentially large quantities of DW.

Messrs. Wagoner and Anderson
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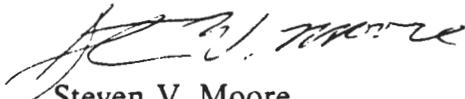
Action 3:

DOE-RL, Ecology and EPA unit managers should immediately meet to determine impacts to in-progress actions like the recent CERCLA Expedited Response Action, planned CERCLA clean up of the process trenches, construction of a 300 Area treatment facility, and Hanford Federal Facility Agreement and Consent Order (HFFACO) milestones (past, present and future) and Consent Order DE-91NM-177.

In order to correct these areas of non-compliance, please complete the suggested actions and return the enclosed "Certification of Compliance" within fourteen (14) days of completion of all actions. If DOE-RL objects (in whole or in part) to the requested actions, notification of the objection is required as described in HFFACO article VIII paragraph 29 within 21 days of receipt of this letter. Please be advised that failure to correct these areas of non-compliance may result in the issuance of an administrative order and/or penalty under RCW 70.105 (Hazardous Waste Management).

Should you have any questions or require clarification on any of the items in this compliance letter, please do not hesitate to call me at (509) 736-3023, or Melodie Selby at (509) 736-3021.

Sincerely,



Steven V. Moore
Dangerous Waste Compliance Inspector
Nuclear and Mixed Waste Management Program

SM:sl

Messrs. Wagoner and Anderson

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May 12, 1993

Please complete and return this form to Steve Moore, Washington State Department of Ecology, 7601 W. Clearwater Avenue, Suite 102, Kennewick, Washington 99336, by June 15, 1993.

CERTIFICATE OF COMPLIANCE

As a legal representative of the U.S. Department of Energy, I certify to the best of my knowledge, the completion of items requested by the Washington State Department of Ecology on May 10, 1993, following investigation of a discharge of dangerous waste to the 300 Area process trenches located on the Hanford Reservation, 300 Areas, Facility ID Number WA7890008967 as shown below.

COMPLIANCE STATUS

(A facility representative shall list the completion date and initial for each item.)

<u>Items of Non-compliance</u>	<u>Due Date</u>	<u>Date Completed</u>	<u>Initials</u>	<u>Comments</u>
Item 1	<u>6/1/93</u>	_____	_____	_____
Item 2	<u>6/1/93</u>	_____	_____	_____
Item 3	<u>Immediate</u>	_____	_____	_____

 Signature of DOE-RL Representative Date

CORRESPONDENCE DISTRIBUTION COVERSHEET

Author SV Moore/Ecology Addressee JD Wagoner/RL
TM Anderson/WHC Correspondence No. Incoming: 9303751B

Subject: ETHYLENE GLYCOL DISCHARGE FROM BUIDLING 309E TO THE 300 AREA PROCESS TRENCH

INTERNAL DISTRIBUTION

Approval	Date	Name	Location	w/att
RECEIVED B. G. ERLANDSON	MAY 1 1993	Correspondence Control	A3-01	
		President's Office		
		LD Arnold	B2-35	
		EJ Bitten	L4-73	
		JG Cassady		
		RF Coté	H6-28	
		RR DiSibio		
		BG Erlandson	H6-20	
		GW Jackson		
		AD Gadeken	B4-52	
		EW Gerber		
		SM Harrington	B4-53	
		MS Holowczak	L0-17	
		GW Jackson		
		JM Knoll Jr		
		MK Korenko (Level 1/Assignee)		
		JA Lauck	B5-20	
		HE McGuire		
		SR Moreno		
		WA Retterer	S2-20	
		WJ Schlauder	R2-34	
		RG Slocum		
		RG Stickney	L0-17	
		DJ Swaim		
		AL Trego		
		JW Tritz	B1-32	
		TB Veneziano		
		EP Vodney		
		GM Wise	B3-70	
		RD Wojtasek		
		Audit Program Adm.	B5-20	
		EDMC	H6-08	
		ESQ Data	L4-86	



CORRESPONDENCE DISTRIBUTION COVERSHEET

Author
J. E. Rasmussen, RL
R. E. Lerch, WHC

Addressee
D. C. Nylander, DOE

Correspondence No.
Incoming: 9303751.1
XRef: 9303751B R1 30418
& 9303751 27956

Subject: RESPONSE TO ENFORCEMENT RECOMMENDATION REGARDING ETHYLENE GLYCOL
DISCHARGE FROM BUILDING 309E TO THE 300 AREA PROCESS TRENCH

INTERNAL DISTRIBUTION

Approval	Date	Name	Location	w/att
		Correspondence Control	A3-01	X
		B. M. Barnes	H6-24	X
		S. M. Belisle	H6-20	X
		R. K. Bhatia	H6-23	X
		R. C. Bowman	H6-24	X
		B. V. Bowersock	S6-19	X
		M. J. Brown	H6-20	X
		L. E. Clay	S6-19	X
		M. B. Enghusen	S6-18	X
		B. G. Erlandson	H6-20	X
		E. M. Greager	H6-30	X
		P. W. Griffin	R2-77	X
		G. W. Jackson, Assignee	H6-20	X
		R. J. Landon	H6-22	X
		J. R. Laws	H6-23	X
		G. J. LeBaron	S6-19	X
		P. J. Mackey	B3-15	X
		M. M. McCarthy	L6-79	X
		H. E. McGuire, Level I	B3-63	X
		S. M. Price	H6-23	X
		F. A. Ruck III	H6-23	X
		C. M. Smith	H6-30	X
		E. H. Smith	H6-22	X
		B. L. Vedder	H6-21	X
		D. E. Wood	H0-32	X
		EDMC	H6-08	X

