



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

08-EMD-0043

JUN 6 2008

Mr. R. Skinnarland, Manager  
Waste Management Section  
Nuclear Waste Program  
State of Washington  
Department of Ecology  
3100 Port of Benton Blvd  
Richland, Washington 99354

**RECEIVED**  
JUN 12 2008  
**EDMC**

Dear Mr. Skinnarland:

RESPONSE TO NOTICE OF CORRECTION FOR THE OPERATION OF TWO DIESEL ENGINES AT THE HANFORD 336 BUILDING SITE AND ASSURANCE OF DISCONTINUANCE – DE06NWP-002

0075098

This is in reference to your letter to me dated January 9, 2008, "Notice of Correction for the Operation of Diesel Engines at the Hanford 336 Building."

The Notice of Correction requires the implementation of "a formal process for assuring the incorporation and implementation of permit requirements in Pacific Northwest National Laboratory (PNNL) project-specific documentation." It also requires "demonstration or documentation of incorporation and implementation of the formalized process, along with an Assurance of Discontinuance," and the Department of Ecology's review and concurrence with the process and Assurance of Discontinuance.

The attachment describes two PNNL processes that have been modified to meet the above requirement, as well as to correct the causes of the permit deviation leading to the notice of correction. The attachment also contains exhibits to demonstrate that these processes have been implemented. Therefore, this letter and its attachment and exhibits are submitted as Assurance of Discontinuance [WAC 173-400-230(3)] for your review and action to close the Notice of Correction.

Mr. R. Skinnarland  
08-EMD-0043

-2-

JUN 6 2008

If you have any questions, or require additional information regarding this submittal, please contact me, or your staff may contact Rob G. Hastings, Acting Assistant Manager for Safety and Environment on (509) 376-9824.

Sincerely,



David A. Brockman  
Manager

EMD:MJF

Attachment

cc w/attach:

B. C. Barfuss, PNNL  
J. M. Barnett, PNNL  
T. G. Beam, FHI  
G. Bohnee, NPT  
J. Bontha, PNNL  
L. J. Brandon, PNNL  
S. D. Cooke, PNNL  
E. G. Damberg, PNNL  
C. J. Duchsherer, PNNL  
B. Erlandson, BNI  
R. D. Haggard, BNI  
S. Harris, CTUIR  
J. A. Hedges, Ecology  
D. W. Hendrickson, Ecology  
N. A. Homan, FHI  
A. K. Ikenberry, PNNL  
R. Jim, YN  
K. A. Peterson, FHI  
D. Powaukee, NPT  
O. S. Wang, Ecology  
R. K. Woodruff, PNNL  
D. Zhen, EPA Region 10

**Administrative Record** [File: Notice of Construction DE06NWP-002; Approval Order DE06NWP-002; 336 Building Diesel Engines Ecology Notice of Violation]  
Environmental Portal, LMSI

## ATTACHMENT

### Pacific Northwest National Laboratory (PNNL) Permit Implementation Processes

PNNL has modified two processes to address the root and contributing causes of the subject permit deviation. The means by which these processes address the causes are discussed below. Exhibits are included as assurance that these processes have been implemented

***Root Cause:***

***There was no formal process at the R&D project or the Management System level for implementing the requirements of the permit.***

**The root cause has been addressed by modifying the Environmental Management Services Division's (EMSD) Permit Implementation Procedure. The modified procedure requires that formal actions to incorporate permit requirements in project-specific implementing documents be assigned to Cognizant Managers, and their completion tracked.**

The modified permit implementation procedure, EMSD-ADMIN-008, Rev. No. 2, (Exhibit 1) requires a permit implementation plan to be prepared, approved, and documented. Upon receipt of a permit, the procedure requires EMSD to determine if the requirements of the permit will be met by existing project-specific documents or by PNNL-wide procedures and policies that apply to all projects. If new procedures or project documents are required, a formal action is created by EMSD in the PNNL Assessment Tracking System (ATS) to prepare the project-specific documents (e.g. Project Management Plan, Standard Operating Procedure, or Test Plan) incorporating the permit requirements. The action is assigned to the Cognizant Manager of the Project Manager conducting the permitted activity. The actions to be completed are documented in a Permit Implementation Matrix (PIM); verified as adequate to meet the permit requirements by the subject matter expert; and reviewed and approved by the Effluent Management Technical Group Lead and the Cognizant Manager.

The approved PIM constitutes the permit implementation plan. Completion of the ATS actions in the PIM is tracked and approved by the Effluent Management Technical Group Lead, after which the permitted activity may start. The project-specific document(s) implementing the permit requirements are uploaded to the ATS database, or cited in the database if too large to upload and then retained in the project files. The PIM will contain the permit requirement for the retention period for any project documents required to demonstrate compliance with the permit.

***First Contributing Cause:***

***The transfer of project management responsibilities between changing project managers was informal and incomplete.***

**This contributing cause is addressed by formal involvement at a higher management level in the permit implementation process.**

The modified permit implementation procedure requires the Cognizant Manager of the Project

Manager to approve the PIM and accept responsibility for the ATS actions required by the project to implement the plan. This involvement makes the Cognizant Manager fully aware of the permit requirements should he/she need to transfer project management responsibility to another person. This contributing cause is also addressed by the fact that a new Project Manager will necessarily be required to understand and apply the requirements contained in the project-specific documents that will include the permit requirement.

***Second Contributing Cause:***

***The receipt inspection process was not comprehensive, and responsibilities not clearly understood or implemented.***

**The modified permit implementation procedure requires and assigns responsibility for receipt inspection.**

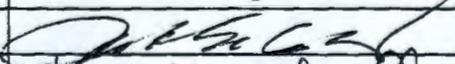
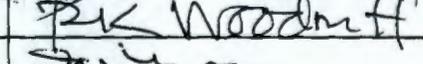
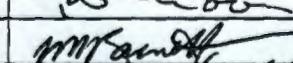
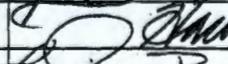
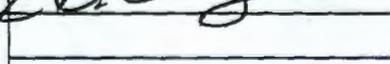
The permit implementation procedure requires that permit conditions, including equipment performance requirements, be incorporated into the PIM. It also requires that an action be created in the ATS system and recorded in the PIM that assigns responsibility for receipt inspection. A briefing is also required so the actions are understood by those responsible for their completion.

***Third Contributing Cause:***

***The responsibilities for the equipment rental acquisition process were not clearly understood or executed.***

**This has been addressed by a modification to the PNNL Acquisition System. The modification causes procurements of equipment or services with potential air emissions to be identified and held until reviewed and approved by the Effluent Management Technical Group Lead.**

PNNL uses a web-based system and database to control the purchase of goods and services. The system uses a mandatory Risk Assessment Checklist (Exhibit 2) to identify procurements that may be subject to special requirements. Question 1 of the Checklist has been modified to more clearly identify procurements potentially subject to air permit or other regulatory requirements, including a Quick Decision Guide (Exhibit 3) to assist the user. A positive response to the question requires review and approval (Exhibit 4) by the Effluent Management Technical Group Lead to verify that requirements are incorporated into procurement specifications. The modified Permit Implementation Procedure requires that deliverables subject to permit requirements be verified for compliance requirements upon delivery.

<b>EMSD Procedure</b>		Page 1 of 8
<b>Title: EMSD Permit Implementation Procedure</b>		<b>Org. Code: D1211</b> <b>Procedure No: EMSD-ADMIN-008</b> <b>Rev. No.: 2</b>
<b>Work Location: Pacific Northwest National Laboratory</b>	<b>Effective Date: March 3, 2008</b>	
<b>Author: Jennifer Su-Coker</b>	<b>Supersedes Date: May 30, 2007</b>	
<b>Identified Hazards:</b> <input type="checkbox"/> Radiological <input type="checkbox"/> Hazardous Materials <input type="checkbox"/> Physical Hazards <input type="checkbox"/> Hazardous Environment <input type="checkbox"/> Other:	<b>Identified Use Category:</b> <input type="checkbox"/> Mandatory Use <input checked="" type="checkbox"/> Reference Use	
<b>Are RPL One-Time Modifications Allowed?</b> <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No If Yes, describe scope/limits:	<b>Are RPL ICNs Allowed?</b> <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No If Yes, describe scope/limits:	
<b>Pre-Job Required</b> <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No If Yes, identify any applicability limits:		
<b>Approvals</b>	<b>Signature</b>	<b>Date</b>
Author: J Su-Coker		2/25/08
User: RK Woodruff		2-25-08
User: TW Moon		26 Feb 08
User: JM Barnett		27 Feb 08
Subject Matter Expert (SME): HT Tilden		2/28/08
Technical Reviewer: LJ Brandon		2/27/08
Responsible Manager: EG Damberg		28 Feb 2008
<b>Concurrence As Appropriate:</b>		
<input type="checkbox"/> Building Manager:		
<input type="checkbox"/> Safety and Health:		
<input type="checkbox"/> Quality Engineer:		
<input type="checkbox"/> Radiological Control:		
<input type="checkbox"/> Other:		

**Note:** The online PDF version is the only official copy of this document. Before using a printed copy, verify that it is the most current version by checking the effective date on the EMSD website.

EXHIBIT 1

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## 1.0 Purpose/Scope

This procedure describes the process for implementing a new or revised regulatory permit that is issued to Pacific Northwest National Laboratory (PNNL) or Battelle. In accordance with the PNNL Standards Based Management System (SBMS), regulations driving regulatory permits have Records of Decision (RODs) that document how the requirements of the regulation are implemented. However, regulatory permits usually contain more specific requirements that implement the driving regulation. According to SBMS, regulatory permits associated with driving requirements are to be referenced in the ROD for the driving regulation, or a ROD can be generated for each regulatory permit.

Because of the fluid nature and complexity of most regulatory permits, the Environmental Management Services Department (EMSD) has elected to generate RODs for a group of regulatory permits (e.g., air permits) and manage the regulatory permit requirements via a Permit Implementation Matrix (PIM). This allows EMSD to document the regulatory-permit implementation method, identify the responsible organization, and indicate the compliance status while keeping all information accurate and up to date.

Therefore, the primary purposes of this procedure are to

- meet the requirements of the SBMS, *Requirements Management* subject area ROD process for managing regulatory permits
- provide a complete and systematic method for documenting how regulatory permit requirements are implemented (subject areas, procedures, project operating procedures and test plans, etc.) and evaluate compliance with these requirements
- document the organization responsible for implementing specific regulatory-permit requirements.

## 2.0 Applicability

This procedure applies to the EMSD Subject Matter Experts (SMEs) responsible for permit compliance and the Effluent Management (EM) Technical Group Lead.

**Note:** In some cases, regulatory permit conditions are the same as the regulatory requirements and hence are covered by RODs for the regulatory requirement. In cases where it is not efficient to generate a PIM for the entire regulatory permit, the management-system owner may elect to complete a ROD for only the requirements that are above and beyond the regulatory requirement (e.g., RCRA permit).

## 3.0 Responsible Staff

**EMSD SME**—The EMSD SMEs are responsible for facilitating and evaluating laboratory compliance with the regulatory permits in their respective areas. SMEs have the primary responsibility under this procedure for completing and finalizing the PIM.

**Technical Group Lead**—The Technical Group Lead of the responsible SMEs is responsible for approving the PIM and ensuring that the required actions are complete and documented.

**4.0 Definitions**

<u>Word</u>	<u>Definition</u>
<i>Standards Based Management System (SBMS)</i>	Online Laboratory-wide policies, standards, procedures and guidelines. Standards, procedures and guidelines are based on input from affected organizations, staff, and other stakeholders; external requirements documents (including orders, directives, and federal, state and local laws); and Battelle policy.
<i>Subject Matter Expert</i>	The EMSD staff members that are qualified and trained to fulfill the assigned role as expert and interpretive authority in a defined regulatory area or discipline.
<i>PIM</i>	Permit Implementation Matrix: A document itemizing the requirements imposed by a regulatory permit and tracking the responsibility and methods for implementing them.
<i>Regulatory Permit</i>	Any liquid-discharge permit, air-discharge permit, notice of construction, Resource Conservation and Recovery Act (RCRA) permit, Department of Health exemption letter, U.S. Environmental Protection Agency approval letter, septic-system registration, or any other environmental permit or authorization issued by an external regulatory agency to PNNL and assigned to the Environmental Management System that specifies requirements for the laboratory to implement.

**5.0 Hazards Assessment/Mitigation Summary**

There are no specific hazards associated with this procedure. Specific hazards associated with regulatory permit implementation will be addressed in the regulatory permit implementation documentation (i.e., procedures, subject areas).

**6.0 Prerequisites**

All SMEs and designated staff must read this procedure before completing the PIM.

**7.0 Work Instructions**

For each regulatory permit issued to PNNL or Battelle and managed by EMSD, the SMEs or designated staff must perform the following activities.

7.1 PIM Preparation and Documentation

Complete the PIM form (see Attachment A) as described below. One PIM is required to be completed for each final regulatory permit.

**Note:** Complete the PIM in a manner and on a schedule that meets the specific permits conditions. For some permits, all implementing documents must be in place and all requirements met before the permitted activities may begin. For other permits, requirements are implemented prior to and during the effective period of the permit.

EXHIBIT 1

- 7.1.1. State the condition or permit requirement number.
- 7.1.2. State the permit requirements or paraphrase as needed. The requirements should be parsed and identified to an appropriate level of detail so it can be linked to regulatory permit implementation documentation (i.e., procedures, subject areas).
- 7.1.3. Perform a Compliance Status Evaluation by comparing the current status of the regulatory permit implementation documentation (processes, procedures, PNNL Standards Based Management System (SMBS) requirements, sampling frequencies, etc.) to requirements in the permit to identify any areas that would not comply or lack implementing documentation.
- 7.1.4. Record compliance status as follows:
  - C—In compliance. Specific project documents or SBMS subject areas are available to implement the requirements.
  - A—Action is required to meet the requirements.
  - N/A—Not applicable. The requirement does not apply to the laboratory.
  - N/R—Compliance determination not required for conditions: 1) that convey a right, 2) are a historical summary or fact, 3) that pertain to actions to be completed in the future (e.g., facility closure), or 4) that pertain to actions required of the agency.
- 7.1.5. Based on the Compliance Status Evaluation enter any actions required to meet permit requirements or document their implementation into the PNNL Assessment Tracking System (ATS) and record the ATS number on the PIM. For example, an action item shall be created if a project procedure or a test plan needs to be prepared or revised to incorporate the permit requirements.

**Note:** The EM Technical Group Lead will be designated as the ATS Assessment Owner and the cognizant manager, e.g. research division's Product Line Manager(s) (PLMs), the Facility and Operations equivalent(s), or Building Manager (BM), as the ATS Condition Owner is required to see the action is completed. ATS actions will be assigned to appropriate staff. ATS entries requiring the preparation of a document to implement permit requirements shall include a requirement to upload the document into the ATS database upon closure of the ATS item, or cite the document(s) if too large to upload.

**Note:** In applicable cases, action items shall include verification that deliverables supplied by external suppliers and subcontractors comply with or will comply with permit requirements. For example, actions shall be created to require verification of receipt of equipment subject to emission performance specifications or certification.

- 7.1.6. List the organizations responsible for implementing the associated requirements. This may be the EMSD, Facilities and Operations, or the research organizations (e.g. National Security Directorate).

## EXHIBIT 1

- 7.1.7. Record the appropriate regulatory permit implementation documentation (i.e., procedures, subject areas) by citing the specific reference or refer to the ATS number where they can be located.
  - 7.1.8. Verify the information provided on the PIM. Record verification by entering the name of the responsible SME or cognizant manager(s) who performed the verification.
  - 7.1.9. Obtain concurrence (e.g. e-mail) from the Technical Group Lead on the PIM.
  - 7.1.10. Conduct a briefing including a summary of the permit, requirements, and relevant action items for the affected cognizant manager (e.g. PLM or BM) and Environmental Compliance Representative (ECR) of the responsible organization. As determined by the EMSD SME, additional staff shall attend the briefing and may include the project managers, the line managers, operations managers, and workers.
  - 7.1.11. Enter any additional action items required, and update existing action items based on inputs obtained during the briefing, as appropriate.
  - 7.1.12. Document the duration, attendees, and description of the briefing on the Briefing Document Form.
  - 7.1.13. Obtain signature approval of the cognizant manager(s) as determined by the EMSD SME.
  - 7.1.14. Obtain signature approval of the EM Technical Group Leader on the PIM.
  - 7.1.15. Attach the completed Briefing Document Form to the briefing materials presented and submit the information to the PNNL Laboratory Training Coordinator. Attendees will receive credit for the briefing in their training records.
  - 7.1.16. Place the approved PIM and applicable supporting documentation into the EMSD Records Inventory and Disposition Schedule/File Index (RIDS), and provide a copy to each cognizant manager for the permitted activity.
  - 7.1.17. Enter the regulatory permit and the PIM in the web-based Permit Information Tracking System (PITS).
- 7.2 Implementing a Permit Modification or Renewal
- Review and update the previously approved PIM by performing steps described in section 7.1 when a permit is modified or renewed.

### 8.0 Records

- The permit
- The completed PIM
- Effluent Management Permit Information Tracking System
- Briefing Document Form

### 9.0 Database/Electronic Media Entry

- PITS entries

EXHIBIT 1

- RODs
- ATS items noted on PIM

**10.0 References**

Standards Based Management System (SBMS), Requirements Management Training, Briefing Document

**11.0 Attachments/Exhibits/Forms**

Attachment A—Permit Implementation Matrix

Attachment A—Permit Implementation Matrix Template

Permit/Project Title: \_\_\_\_\_  
 Permit/Approval No. \_\_\_\_\_  
 Date Approved: \_\_\_\_\_  
 Effective Date: \_\_\_\_\_  
 Expiration Date: \_\_\_\_\_

Permit Condition Number	Permit Requirement	Compliance Status	ATS Number	Responsible Implementing Organization	Implementation Method	Verified by
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State condition/requirement number if identified in the permit.

State the permit condition as noted or paraphrase as needed. The requirement should be parsed/identified to an appropriate level of detail so it can be linked to implementation approaches in the laboratory. Additional guidelines for parsing requirements are in SBMS, *Requirements*

Document any actions required to implement the requirement or improve the implementation method. Also, document the ATS condition number for the corresponding action.

The responsible implementing organization is the organization responsible for implementing the associated requirement. Examples of LCMIT facilities and operations in the research organizations.

Document who verified the information.

C—In compliance  
 A—Action required or recommended.  
 N/A—Not applicable. The requirement does not apply to the laboratory.  
 N/R—Compliance determination not required for conditions that convey a right, are a historical summary or fact, that pertain to actions to be completed in the future, or that pertain to actions

Reference the specific SBMS subject areas, organizational procedures, project procedures, test plans or refer to the ATS

Verification:

EMSD SME / Date \_\_\_\_\_

Cognizant Manager / Date \_\_\_\_\_

Approval:

EM Technical Group Lead / Date \_\_\_\_\_

**Requisition#: 0000066129 Status: Draft Date Saved: 4/8/2008 1:18:26 PM**

Check all boxes applicable to the good or service being purchased. If you do not understand the question or need assistance, SBMS links are provided to assist. When you have completed this, scroll to the bottom of the form and click on the appropriate button.

	<b>Check all that Apply</b>	<b>SBMS Reference(s)</b>	<b>Forms &amp; Tools</b>	<b>Contact</b>	<b>Contact Type</b>
1.	<input type="checkbox"/> Air or Liquid Discharges may be generated	<a href="#">Airborne Emissions</a> <a href="#">Liquid Effluents, Managing</a>	<a href="#">Quick Decision Guide</a>	Effluent Management	Approv
2.	<input type="checkbox"/> Aircraft Services	<a href="#">Aircraft Flight Operations</a>	<a href="#">Flight Operations Request</a>	PNNL Aviation POC	Approv
3.	<input type="checkbox"/> Biological Materials	<a href="#">Biological Material</a>		Biological Safety Officer	Approv
4.	<input type="checkbox"/> Chemicals	<a href="#">Working with Chemicals</a>	<a href="#">Chemical Management System</a> <a href="#">Acquiring and Moving Chemicals</a>	Chemical Management System Manager	Review
5.	<input type="checkbox"/> Compressed Gases	<a href="#">Compressed Gases</a>	<a href="#">Compressed Gas Use Plan</a>	Safety and Health Representative	Review
6.	<input type="checkbox"/> Conferences, Meetings, and Workshops	<a href="#">Conferences and Meetings - Contracting for Non-Battelle Staff Participation</a>	<a href="#">Purchase Requisition Information for Workshop Agreements</a>		
7.	<input type="checkbox"/> Conflict of Interest	<a href="#">Conflict of Interest</a>	<a href="#">Preprocurement Organizational Conflict of Interest Fact Sheet</a>		
8.	<input type="checkbox"/> Controlled Substance	<a href="#">Controlled Substances</a>	<a href="#">Controlled Substance Usage Report Form</a>	Controlled Substance Coordinator	Approv
9.	<input type="checkbox"/> Craft Services Turndown	<a href="#">Labor Relations</a>	<a href="#">Electronic Turndown System</a>		
10.	<input type="checkbox"/> Electrical Equipment	<a href="#">Electrical Equipment: Designating, Purchasing, and Installing</a>	<a href="#">Electrical Safety Design Criteria Checklist</a>	Electrical Safety	Approv
11.	<input type="checkbox"/> Explosives, Use of	<a href="#">Working with Chemicals</a>	<a href="#">Explosive Materials Safety Form</a>	Explosive Safety Engineer	Approv
12.	<input type="checkbox"/> Export Control	<a href="#">Export Control</a>		Export Control Coordinator	Approv
13.	<input type="checkbox"/> Facility Modifications and Construction Services	<a href="#">Service Request Process</a>	<a href="#">Service Request System</a>	Facilities Service Manager	Approv
14.	<input type="checkbox"/> Foreign Travel	<a href="#">Foreign Travel</a>	<a href="#">Request for Approval of Foreign Travel</a>	Foreign Travel	Approv
15.	<input type="checkbox"/> Inspection, Post-Installation and/or Acceptance Testing	<a href="#">Inspection and Acceptance Testing of a Deliverable</a>			
16.	<input type="checkbox"/> Inspection, Quality	<a href="#">Inspection and Acceptance Testing of a Deliverable</a>		Quality Engineer, APMS	Approv
32.	<input type="checkbox"/> Exceptional Patent Situations	<a href="#">Purchasing Goods and Services (Special Requirements)</a>		Technology Commercialization	Approv

I verify that I have read all of the list items and have correctly checked the applicable items to the best of my knowledge.

[Return to Requisition](#)

[Back](#) [Go to Summary](#)



Documents

Permits

Procedures

Training

Helpful Links

Contacts

Frequently Asked  
Questions

RPL  
Rad Air

EMS Home

Effluent  
Management Home

**Pacific Northwest  
National Laboratory**  
Operated by Battelle for the  
U.S. Department of Energy

## ePro Quick Decision Guide

Check the box if you will be procuring, renting or leasing equipment, or procuring a service with potential air or liquid discharges. **For example:**

### AIR DISCHARGES

#### Equipment:

1. That combust a fuel [e.g. engines (excluding on-road vehicles), boilers and furnaces]
2. Cleaning machine using a solvent
3. Ethylene oxide sterilizer
4. Chemical concentration evaporator
5. Heat-treat and burnout oven

#### Services:

1. To build, rebuild, overhaul or modify combustion equipment (such as listed above)
2. That will result in the operation by others of the equipment listed above on or in DOE or Battelle property or facilities

### LIQUID DISCHARGES

#### Equipment:

That will discharge wastewater or cooling water to a sewer system (e.g. glassware washers, garbage disposals, autoclaves, analytical equipment, aquaculture systems, environmental chambers, lasers)

#### Services:

Expected to discharge liquids to the ground or sewers on or in DOE or Battelle property or facilities (e.g., cleaning, construction, installation or maintenance of equipment)

---

Do you have a suggestion for improvement to the Effluent Management Program?  
Submit your comment to [^Effluent Management](#) and we'll get back to you.

---

Pagemaster: [Carol Elledge](#)  
Reviewed: April 2008



**Requisition Approval**

**Req Name:** Continued Rental for May/June  
**Total:** 1600.00 USD **Non B2B Requisition**  
**Requester:** Brawn,David R **Requisition ID:** 0000066983  
**Entered on:** 04/15/2008 **PO to Modify:** 0000057023  
**Status:** Pending **Tech Admin:** Brawn,David R **Priority:** Medium

**Requester's Justification:** [View Risk Assessment](#)  
 Continued rental on small contingency generator due to continuing delays in installation of Transfer Switch to replace damaged unit.

Line Information

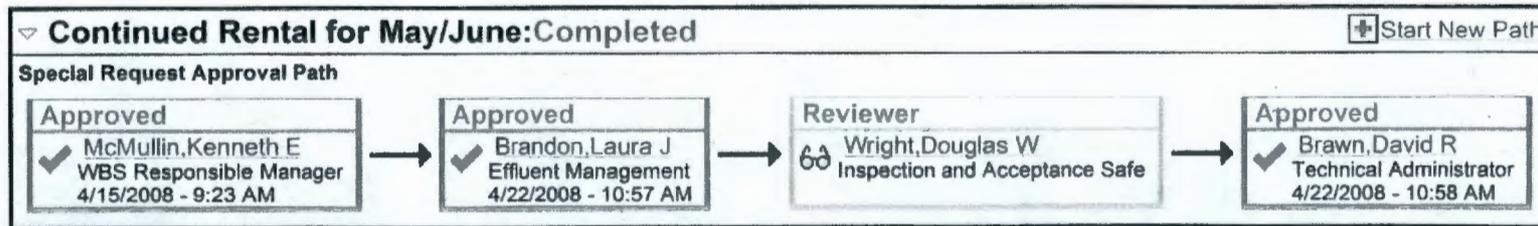
Line	Item Description	Vendor Name	Qty	UOM	Price	Curr	Requester's Comments
<input type="checkbox"/>	1 Equipment Rental on Continge...	WEST-047	1.0000	EA	1,600.00	USD	

Select All / Deselect All

View Line Details

Review/Edit Approvers

**Management Approval**



**Contracts (BSS) Approvals**

