



U.S. Department of Energy

~~Office of Environmental Safety and Quality~~

P.O. Box 450, MSIN H6-60  
Richland, Washington 99352

NOV 28 2007

07-ESQ-213

Mr. W. S. Elkins, Project Director  
Bechtel National, Inc.  
2435 Stevens Center Place  
Richland, Washington 99354

Dear Mr. Elkins:

CONTRACT NO. DE-AC27-01RV14136 – ASSESSMENT REPORT A-07-ESQ-RPPWTP-016  
ASSESSMENT OF INDUSTRIAL HYGIENE (IH) PROGRAM IMPLEMENTATION  
SEPTEMBER 17 THROUGH 21, 2007

This letter forwards the results of the U.S. Department of Energy, Office of River Protection assessment of the Bechtel National, Inc. (BNI) IH program implementation conducted from September 17 through 21, 2007. The Team had four Assessment Follow-up Items and one observation.

In the area of IH, the Team concluded that the program is meeting the intent of 10 Code of Federal Regulations 851, "Worker Safety and Health Program," however the team also found that BNI has not fully implemented the requirements of the regulation. This was especially evident in the implementation of the American Conference of Governmental Industrial Hygienist's Threshold Limit Values related to physical hazards. As noted in previous audits of the BNI program, there is still a weakness in the contractor self-assessment program.

If you have any questions, please contact me, or your staff may contact William J. Taylor, Assistant Manager, Office of Environmental Safety and Quality, (509) 376-7851.

Sincerely,

William J. Taylor, Assistant Manager  
Office of Environmental Safety and Quality

ESQ:PRH

Attachment

cc w/attach:

D. E. Gergely, BNI  
D. E. Kammenzind, BNI  
S. W. Sanders, PAC  
C. R. Ungerecht, PAC  
Administrative Record  
BNI Correspondence

U.S. DEPARTMENT OF ENERGY  
Office of River Protection  
Environmental Safety and Quality

ASSESSMENT: Office of Environmental Safety and Quality Assessment of  
Bechtel National, Inc.'s Waste Treatment and  
Immobilization Plant Industrial Hygiene Program

REPORT: A-07-ESQ-RPPWTP-016

FACILITY: Bechtel National, Inc. Waste Treatment and Immobilization  
Plant

LOCATION: Hanford Site

DATES: September 17 through 20, 2007

ASSESSORS: Paul Hernandez, Lead Assessor  
Stephen Bump, Assessor  
Jim Navarro, U.S. Department of Energy  
Facility Representative

APPROVED BY: Patrick Carier, Team Lead  
Verification and Confirmation Team

The assessors also reviewed closure documentation for findings and observations resulting from Assessment Report A-06-ESQ-RPPWTP-009. The assessors were not able to close any of the remaining findings or observations from that report. The findings related to self-assessment program and hearing conservation and observations related to ergonomics and cold stress need additional management attention and documentation prior to closure.

The ergonomics issue remains open as sections of it are now required by 10 CFR 851.23. There are four ergonomics issues called out by the regulations that need to be addressed by the contractor: Hand Activity Level, Hand-Arm (Segmental) Vibration, Whole-Body Vibration, and Lifting.

## Executive Summary

The U.S. Department of Energy, Office of River Protection (ORP) conducted an assessment of Bechtel National, Inc.'s (BNI) Industrial Hygiene (IH) Program from September 17 through 20, 2007.

The assessors reviewed the Waste Treatment and Immobilization Plant (WTP) Worker Safety and Health Program, IH Plan and implementing procedures, reviewed training lesson plans, and interviewed personnel involved in the IH program to ensure that regulatory requirements as specified in 10 Code of Federal Regulations (CFR) 851, "Worker Safety and Health Program," 29 CFR 1926.1126, "Safety and Health Regulations for Construction," and 29 CFR 1910, "Occupational Safety and Health Standards" were adequately implemented.

The assessors concluded the BNI IH Program met regulatory requirements, except as noted below in the Assessment Follow-up Items (AFI) and observations.

There were four AFIs resulting from this assessment:

A-07-ESQ-RPPWTP-016-AFI01: The contractor has not evaluated the lifting hazards at WTP to determine compliance with the American Conference of Governmental Industrial Hygienists (ACGIH) Threshold Limit Value (TLV) as required by 10 CFR 851.23. The contractor has not taken effective steps to mitigate the hand and arm vibration stresses resulting from concrete cleaning. Although Personal Protective Equipment had been requested, it had not been provided nor was an expected date of arrival provided. Engineering controls were discussed at the time of the assessment. Both of these items are related to the earlier observations on the ergonomics program.

A-07-ESQ-RPPWTP-016-AFI02: The contractor does not have a monitoring plan for noise as required by 29 CFR 1910.95(d)(1) nor has the contractor evaluated the effectiveness of the hearing protection provided to the carpenters. Although BNI has proposed corrective actions related to noise monitoring and hearing conservation, these corrective actions had not been completed at the time of the assessment.

A-07-ESQ-RPPWTP-016-AFI03: BNI does not provide personnel monitoring results to employees as required by the Occupational Safety and Health Administration standards. This has been previously identified by ORP. BNI corrective actions had not been completed at the time of the assessment.

A-07-ESQ-RPPWTP-016-AFI04: BNI has not effectively implemented the ACGIH TLV on Thermal Stress in that monitoring results are not used to implement hazard controls.

There was one observation resulting from this assessment:

A-07-ESQ-RPPWTP-016-O01: The BNI record keeping program does not allow instrumentation to be linked to the work area where it was used.

The assessors also reviewed closure documentation for findings and observations resulting from Assessment Report A-06-ESQ-RPPWTP-009. The assessors were not able to close any of the remaining findings or observations from that report. The findings related to self-assessment program and hearing conservation and observations related to ergonomics and cold stress need additional management attention and documentation prior to closure.

The ergonomics issue remains open as sections of it are now required by 10 CFR 851.23. There are four ergonomics issues called out by the regulations that need to be addressed by the contractor: Hand Activity Level, Hand-Arm (Segmental) Vibration, Whole-Body Vibration, and Lifting.

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## List of Acronyms

ACGIH	American Conference of Governmental Industrial Hygienists
AFI	Assessment Follow-up Items
BNI	Bechtel National Inc.
CFR	Code of Federal Regulations
DOE	U.S. Department of Energy
EJTA	Employee Job Task Analysis
HLW	High-Level Waste
IH	Industrial Hygiene
JHA	Job Hazard Analysis
ORP	Office of River Protection
PPE	Personal Protective Equipment
STARRT	Safety Task Analysis Risk Reduction Talk
TLV	Threshold Limit Value
WTP	Waste Treatment and Immobilization Plant

U.S. Department of Energy (DOE), Office of River Protection (ORP) Office of Environmental Safety and Quality Assessment of Bechtel National, Inc.'s (BNI) Waste Treatment and Immobilization Plant (WTP) Industrial Hygiene (IH) Program

**Scope**

The scope of the BNI WTP IH program assessment was focused on the contractor's implementation of 10 Code of Federal Regulations (CFR) 851, "Worker Safety and Health Programs," as promulgated by DOE. This rule incorporates 29 CFR 1926.1126, "Safety and Health Regulations for Construction," 29 CFR 1910, "Occupational Safety and Health Standards," and the American Conference of Governmental Industrial Hygienists' (ACGIH) "Threshold Limit Values for Chemical Substances and Physical Agents & Biological Exposure Indices," by reference.

The assessors reviewed the IH implementing plans and procedures, performed field walk downs of work areas, reviewed records generated by the program, and interviewed personnel involved in the IH program.

**Details**

The ORP assessors conducted a series of interviews with safety professionals, workers, and a DOE facility representative. At the request of the Safety Assurance Manager, the team reviewed a recent independent assessment of the Safety Assurance Program. The independent assessment included IH program elements. Weaknesses identified in that report were reviewed and where applicable will be referenced as non-cited observations and findings.

Specific IH program areas that were reviewed included:

Program Documentation

The assessors reviewed IH documentation including plans, procedures, and IH records. Specific records reviewed included: Job Hazard Analysis (JHA), Employee Job Task Analysis (EJTA), Medical Placement Evaluations, Baseline Exposure Assessment Plans and Evaluations, Management Assessment Reports, and DOE inspection notes. Program documentation for closure of previous findings and observations was reviewed.

With regard to closure of previous findings and observations, the program documentation would not support closure of the findings on self-assessments and noise nor the observations on ergonomic and cold stress. A Baseline Hazard Evaluation Plan has not been developed for noise or for cold stress. The lack of plans results in the lack of evaluations.

## Exposure Assessment Strategy

BNI is required by 10 CFR 851, Appendix A.6 to implement a comprehensive IH program that includes at least the following elements: Initial or baseline surveys and periodic resurveys and/or exposure monitoring as appropriate of all work areas or operations to identify and evaluate potential worker health risks. BNI has developed an exposure assessment strategy procedure; however the scope of the procedure is limited to airborne chemical hazards. A similar process has not been implemented for other physical hazards such as noise, thermal stress, ergonomics, and non-ionizing radiation.

As a result, weaknesses were identified in evaluation of lifting hazards, control of vibration, and monitoring and mitigation of noise sources.

10 CFR 851.23(a) states "Contractors must comply with the following safety and health standards that are applicable to the hazards at their covered workplace: (9) American Conference of Governmental Industrial Hygienists (ACGIH), 'Threshold Limit Values for Chemical Substances and Physical Agents and Biological Exposure Indices,' (2005) (incorporated by reference, see § 851.27) when the ACGIH Threshold Limit Values (TLV) are lower (more protective) than permissible exposure limits in 29 CFR 1910. When the ACGIH TLVs are used as exposure limits, contractors must nonetheless comply with the other provisions of any applicable expanded health standard found in 29 CFR 1910."

This reference includes TLVs for physical hazards that are either more restrictive than 29 CFR 1910, such as noise, or are not covered by 29 CFR 1910, such as ergonomics and thermal stress. Contrary to this, the contractor has not performed an exposure assessment on lifting, vibration, noise or thermal stress.

During the assessment, work involving placement of re-bar was observed. This task included the movement of 50 to 60 pound sections of re-bar and placement in to a section of a wall in the High-Level Waste (HLW) building. Review of the JHA and Safety Task Analysis Risk Reduction Talk (STARRT) cards for the placement of re-bar only mention use of proper lifting technique, but do not mention weight or repetition limits. The TLV for lifting includes criteria for duration of work, number of lifts per hour, weight limits, and evaluation of the actual lift being performed. Assessment Follow-up Item (AFI) A-07-ESQ-RPPWTP-016-AFI01 was written to document the lack of evaluation of worker health risks associated with lifting.

Work at the Carpenter's shop involving the cleaning and refurbishment of concrete forms was observed. The cleaning process involves the use of an electric hammer and chisel. There is significant noise and vibration present during the work. This area is posted as requiring double hearing protection. When questioned about the posting, the Carpenter's stated that monitoring had been done several years ago and the safety organization had required the double hearing protection. No subsequent monitoring had been performed and there was no evaluation of the effectiveness of the hearing protection. Both are required under 29 CFR 1901.95. AFI A-07-ESQ-RPPWTP-016-AFI02 was written to

document the lack of noise monitoring and evaluation of effectiveness of hearing protection.

During the work observation at the Carpenter's shop, it was noted that the carpenter using the electric chisel was holding the shank. This activity exposed the carpenter to significant hand and arm vibration. The carpenter showed the assessment team the anti-vibration gloves that were available and demonstrated why the gloves were not effective. The carpenter was wearing gloves, but the gloves were not adequate to dampen the vibration exposure. New anti-vibration gloves had been on order for some time, but there was no expected date for delivery. Discussions with the Lead Industrial Hygienist indicated an engineering fix might be possible. However, new tools would need to be procured to implement the change. The lack of adequate Personal Protective Equipment (PPE) was included in A-07-ESQ-RPPWTP-016-AFI01 as this issue also relates to ergonomics.

#### Worker Safety and Health Program

BNI was required by 10 CFR 851 to develop and implement a Worker Safety and Health Program. This program was approved by DOE on May 16, 2007. 10 CFR 851, Appendix A.6 also requires that contractors implement a comprehensive IH program that includes at least the following elements: a) Coordination with planning and design personnel to anticipate and control health hazards that proposed facilities and operations would introduce; b) Coordination with cognizant occupational medical, environmental, health physics, and work planning professionals. As noted in the independent assessment report, BNI has an over reliance on generic JHAs. BNI has attempted to address this through changes to JHA procedure requiring a Safety Assurance review prior to use to ensure the hazards are adequately addressed. At the time of the assessment, it was noted that Safety Assurance often finds out about scheduled work at the plan of the day meeting. This does not give the Safety Assurance representative time to perform an adequate review of the JHA and STARRT card prior to work commencing. Since this has been identified by BNI's own assessment process, this will be a non-cited observation.

#### IH Program

BNI is required by 10 CFR 851, Appendix A.6 to implement a comprehensive and effective IH program to reduce the risk of work-related disease or illness. The IH program was reviewed for compliance with the standard. The program adequately addresses the required aspects. There were no weaknesses identified in the area.

#### Occupational Medicine Program

The occupational Medicine program was reviewed as it relates to determining physical abilities for performing work and response to hazards identified on the EJTA. The physical requirements for performing work as an Ironworker were reviewed in depth given the potential lifting issue identified earlier. A specific protocol has been developed

for personnel required to perform lifting tasks on a regular basis. This includes a "back" evaluation, grip strength evaluation, and a lifting evaluation. Although this does not assure BNI the employee will not be injured performing the lifting task, it does provide assurance the person is physically capable of performing the task safely. No weaknesses were identified in this program.

#### Health and Safety Training Program

Initial health and safety training is provided to all employees. In addition, task specific training is provided. BNI has recently instituted a card system showing the training and qualification status of each employee. This replaces the "hard hat sticker" program that had been in place. Effectiveness of training had been recently assessed by the DOE Facility Representative and was not repeated for this assessment.

#### Record Keeping Program

BNI is required by 10 CFR 851.26.a(1) to establish and maintain complete and accurate records of all hazard inventory information, hazard assessments, exposure measurements, and exposure controls. BNI listed their hazard inventory in the Worker Safety and Health Plan. Although the list is general in nature, it does cover the spectrum of concerns for the construction project. As noted above, the hazard assessment process is not complete for the physical hazards encountered in the IH program. Monitoring records are kept in a database and are retrievable from that standpoint.

Instrumentation use and calibration records cannot be easily tied to the job where the instrument was used. For example, the confined space entry permit had a record that oxygen levels were measured, but did not identify the instrument used for the reading. The instrument check out log showed that instruments were checked and were used, but did not indicate where. Although the IH Technical Lead was aware of the issue, it has not been entered in to the Project Issues Evaluation Reporting system. Observation A-07-ESQ-RPPWTP-016-O01 was written to document the weakness in the record keeping program.

#### Employee Involvement in Safety

BNI continues to use the JHA and STARRT cards to get employee input to hazard identification and mitigation. Notwithstanding the weaknesses inherent in standing JHAs, the JHA process does involve the craft in reviewing the work. The STARRT card process has been previously identified as a good practice. Not only are these cards used for every job, the employees take ownership in the process. On several instances during facility walk downs, the assessment team was asked to review and sign the STARRT card prior to watching work in the area. No weaknesses were identified in this area.

### Workers Rights to receive Monitoring Results

The WTP IH Plan, 24590-WTP-PL-SA-06-0005, states that any monitoring results above 50% of the Permissible Exposure Limit or TLV will be reported to the employee. The exposure standards in 29 CFR 1926 require that all monitoring results be provided to the affected employee in writing within five working days of receiving the results. AFI A-07-ESQ-RPPWTP-016-AFI03 was written to document the incompleteness of corrective actions related to resolving the noncompliance with the rule.

### Non-ionizing Radiation

At the time of the assessment no sources of non-ionizing radiation had been identified at WTP. There is recognition that as large electrical components are installed, this will change. No weaknesses identified in this area.

### Respiratory Protection

The respiratory protection program was reviewed in August 2007 by the DOE Facility Representative, reference inspection note A-07-AMWTP-RPPWTP-03-51. Additional review of this program was not performed.

### Thermal Stress

Monitoring results for heat stress were reviewed. It was apparent that readings were taken in various locations at various times of the day. There were a number of readings that exceeded the TLV which would normally require implementation of a work-rest regimen. However, there was no documentation available to demonstrate any action taken as a result of these readings. BNI has a policy to allow workers to take breaks as necessary. However, this would not meet the requirements defined in the Thermal Stress TLV. AFI A-07-ESQ-RPPWTP-016-AFI04 was written to document the incompleteness of corrective actions with regard to implementing appropriate hazard controls in the Thermal Stress procedure.

### Personal Protective Equipment

The assessment team performed field observations of PPE usage during preparations for and placement of concrete at the HLW Facility during September 19 through 20, 2007. The STARRT cards for these activities to verify the requirement for the different types of PPE required.

Items reviewed included:

- Use of hearing protection – requirement met, with one exception; the operator of the concrete pump truck controls was within the hearing protection yellow tape boundary but did not wear hearing protection. The assessment team discussed this with the Site Safety Manager. He approached the operator, who told him he suffers from hearing

loss, and if he wears standard hearing protection he will not be able to hear the differences in the sound of the pump which warn or indicate him of potential pump issues. They discussed the use of special hearing protection that reduces noise only from a specific noise range, so that he could still hear the sound of the pump but protect the worker from other noises. The Site Safety Manager indicated he will pursue the special hearing protection for these types of applications.

- Hard hat use – requirement met.
- Footwear – requirement met, including the use of rubber boots while working within the concrete.
- Eye protection (Safety glasses and or face shield) – requirement met, including use of face shield while grinding operation.
- Leather gloves – requirement met.
- Rubber gloves – requirement met while placing concrete, although one individual sometimes removed then replaced the rubber gloves, rather than wearing the gloves continuously.
- Use of knee pads – requirement met while working from knees.

The requirements for PPE were properly identified on the STARRT cards reviewed. The activities were preparations for concrete placement and the placement itself. Observations made indicated good adherence to PPE requirements with the minor exceptions noted above.

### Contractor Workplace Inspections

BNI is currently working on a list of required workplace surveillances. Other than sub-contractor oversight assessments, these have not been implemented to date. As an example, 29 CFR 1910.135, "Occupational Safety and health Standard – Respiratory Protection" requires a periodic evaluation of the respiratory protection program. BNI was unable to produce an evaluation of their program. Even though the requirement is "periodic," it is evident that a period of zero is not the intent of the requirement. This is an example of the continued weakness in BNI's assessment program. This issue has been identified by BNI and ORP.

### **Results**

The assessors concluded:

The BNI IH program is weak in terms of documentation of hazard evaluation, hazard identification and mitigation.

### **Assessment Follow-up Items**

**A-07-ESQ-RPPWTP-016-AFI01** BNI has not implemented the ACGIH TLV with regards to lifting. BNI has not effectively mitigated the hand-arm vibration hazard associated with concrete form cleaning.

- A-07-ESQ-RPPWTP-016-AFI02** BNI has not implemented 29 CFR 1910.95 with regards to noise monitoring and evaluation of effectiveness of hearing protection.
- A-07-ESQ-RPPWTP-016- AFI03** BNI does not provide personnel monitoring results to employees as required by Occupational Safety and Health Administration standards.
- A-07-ESQ-RPPWTP-016-AFI04** BNI has not effectively implemented the ACGIH TLV on Thermal Stress in that monitoring results are not used to implement hazard controls.

**Observations**

- A-07-ESQ-RPPWTP-016-O01** The BNI record keeping program does not allow instrumentation to be linked to the work where it was used.

**Good Practices**

None

**Conclusions**

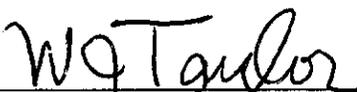
The assessors concluded that although the BNI-WTP IH program meets the intent of 10 CFR 851, corrective actions are necessary to fully implement the standards.

**Closed Items**

None

**Signatures**

  
\_\_\_\_\_  
Paul R. Hernandez  
Assessment Team Leader

  
\_\_\_\_\_  
Patrick P. Carier, Team Leader  
Verification and Confirmation Division

<b>Task# ORP-ESQ-2007-0220</b>
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E-STARS<sup>®</sup> Report  
Task Detail Report  
11/28/2007 1231

**TASK INFORMATION**

<b>Task#</b>	ORP-ESQ-2007-0220		
<b>Subject</b>	CONCUR:07-ESQ-213; ASSESSMENT REPORT A-07-ESQ-RPPWTP-016 ASSESSMENT OF INDUSTRIAL HYGIENE PROGRAM IMPLEMENTATION SEPTEMBER 17 - 21, 2007		
<b>Parent Task#</b>		<b>Status</b>	CLOSED 11/28/2007
<b>Reference</b>	07-ESQ-213	<b>Due</b>	
<b>Originator</b>	Gano, Becky (Gano, Becky)	<b>Priority</b>	High
<b>Originator Phone</b>	(509) 376-6004	<b>Category</b>	None
<b>Origination Date</b>	11/13/2007 1010	<b>Generic1</b>	
<b>Remote Task#</b>		<b>Generic2</b>	
<b>Deliverable</b>	None	<b>Generic3</b>	
<b>Class</b>	Long Term	<b>View Permissions</b>	Normal

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J.L.POLEHN, ESQ  
W.J.TAYLOR, ESQ

RECORD NOTE:

**ROUTING LISTS**

1	Route List	Inactive
	<ul style="list-style-type: none"> <li>● Hernandez, Paul R - Review - Concur - 11/28/2007 1229 <i>Instructions:</i></li> <li>● Carier, Patrick P - Review - Concur - 11/28/2007 1229 <i>Instructions:</i></li> <li>● Taylor, William - Review - Concur - 11/28/2007 0829 <i>Instructions:</i></li> <li>● Eschenberg, John R - Review - Concur with comments - 11/26/2007 1302 <i>Instructions:</i></li> <li>● Olinger, Shirley J - Approve - Cancelled - 11/28/2007 1231 <i>Instructions:</i></li> </ul>	

**RECEIVED****NOV 28 2007****DOE-ORP/ORPCC****ATTACHMENTS**

<b>Attachments</b>	<ol style="list-style-type: none"> <li>1. 07-ESQ-213 att Assessment Report A-07-ESQ-RPPWTP-016.doc</li> <li>2. 07-ESQ-213 BNI LTR Submittal of Assessment Report A-07-ESQ-RPPWTP-016.doc</li> </ol>
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**COLLABORATION**

<b>Task# ORP-ESQ-2007-0220</b>
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**COMMENTS**

<b>Poster</b>	Eschenberg, John R (Perez, Anez) - 11/26/2007 0111
	Concur
	<p>w/comments. Executive Summary Page ii (Attachment)</p> <p>5th paragraph, sentence 1: Remove "on lifting" after (TLV), sentence 2: add the word "stresses" The contractor has not taken effective steps to mitigate the hand and arm vibration "stresses" resulting from concrete cleaning.</p> <p>7th paragraph, Remove space after 016 - "A-07-ESQ-RPPWTP-016" "-AFI03"</p> <p>10th paragraph, 1st sentence add "area" - The BNI record keeping program does not allow instrumentation to be linked to the work "area" where it was used.</p>
<b>Poster</b>	Gano, Becky (Gano, Becky) - 11/28/2007 1211
	CLOSED
	Lori Huffman signed for Bill Taylor, as Acting ESQ, on 11/28/07, per Shirley Olinger.

**TASK DUE DATE HISTORY**

*No Due Date History*

**SUB TASK HISTORY**

*No Subtasks*

-- end of report --

**Task# ORP-ESQ-2007-0220**

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 Task Detail Report  
 11/13/2007 1014

**TASK INFORMATION**

<b>Task#</b>	ORP-ESQ-2007-0220		
<b>Subject</b>	CONCUR:07-ESQ-213; ASSESSMENT REPORT A-07-ESQ-RPPWTP-016 ASSESSMENT OF INDUSTRIAL HYGIENE PROGRAM IMPLEMENTATION SEPTEMBER 17 - 21, 2007		
<b>Parent Task#</b>		<b>Status</b>	Open
<b>Reference</b>	07-ESQ-213	<b>Due</b>	
<b>Originator</b>	Gano, Becky (Gano, Becky)	<b>Priority</b>	High
<b>Originator Phone</b>	(509) 376-6004	<b>Category</b>	None
<b>Origination Date</b>	11/13/2007 1010	<b>Generic1</b>	
<b>Remote Task#</b>		<b>Generic2</b>	
<b>Deliverable</b>	None	<b>Generic3</b>	
<b>Class</b>	Long Term	<b>View Permissions</b>	Normal

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 RECORD NOTE:

**ROUTING LISTS**

1	Route List	Active
	<ul style="list-style-type: none"> <li>Hernandez, Paul R - Review - Awaiting Response - Due Date  <i>Instructions:</i> Paul Hernandez 11/15/07</li> </ul>	
	<ul style="list-style-type: none"> <li>Carrier, Patrick P - Review - Awaiting Response - Due Date  <i>Instructions:</i> WJT 11/18/07</li> </ul>	
	<ul style="list-style-type: none"> <li>Taylor, William - Review - Awaiting Response - Due Date  <i>Instructions:</i> WJT 11/18/07 w/COMMENTS</li> </ul>	
	<ul style="list-style-type: none"> <li>Eschenberg, John R - Review - Awaiting Response - Due Date  <i>Instructions:</i> [Signature] 11/22/07 w/comment [Signature]</li> </ul>	
	<ul style="list-style-type: none"> <li>Olinger, Shirley J - Approve - Awaiting Response - Due Date  <i>Instructions:</i></li> </ul>	

**ATTACHMENTS**

<b>Attachments</b>	<ol style="list-style-type: none"> <li>07-ESQ-213 att Assessment Report A-07-ESQ-RPPWTP-016.doc</li> <li>07-ESQ-213 BNI LTR Submittal of Assessment Report A-07-ESQ-RPPWTP-016.doc</li> </ol>
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**COLLABORATION**

<b>Collaborators</b>	
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**COMMENTS**

<b>Comments</b>	
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