



Fernald Environmental Management Project
P.O. Box 538704
Cincinnati, Ohio 45253-8704

FLUOR DANIEL
FERNALD

2654

29 NOV 1999

Mr. Phillip C. Harris
Division of Hazardous Waste Management
Ohio Environmental Protection Agency
401 East Fifth Street
Dayton, Ohio 45402-2911

DOE-0187-00

Dear Mr. Harris:

**RESPONSE TO THE OHIO ENVIRONMENTAL PROTECTION AGENCY
NOTICE OF VIOLATION**

Reference: Letter, Phillip C. Harris to Mr. Jack Craig and Mr. John Bradburne, "U.S. DOE-FEMP - Notice of Violation (NOV)," dated November 10, 1999.

This letter provides descriptions of corrective actions taken to address violations cited in the referenced letter regarding the two leaking containers that were self-reported by the Department of Energy, Fernald Environmental Management Project (DOE-FEMP). Also, provided are descriptions of actions taken or being implemented to prevent recurrences of the violations. In addition are responses to your request for "Information and Documentation" on seven specific items and comments regarding two "Issues and Concerns" which were received as part of the Notice of Violation.

The following items were requested from the DOE/FEMP and Fluor Daniel Fernald, Inc. (FDF):

Correction of Cited Violations:

The following actions have been completed to correct the cited violations regarding the two reported leaking metal boxes:

- Metal box W170797 was moved from the Plant 1 Pad area west of Building 71 into an approved Resource Conservation and Recovery Act (RCRA) storage area on October 7, 1999. Approximately five inches of liquid remaining in the container was pumped out and transferred to Phase 2 of the site's Advanced Waste Water Treatment facility for treatment through the activated carbon organic treatment system on November 4, 1999.

000001

- The contents of metal box W169457, which had leaked into the TS-6 sump, were pumped from the sump on October 27, 1999 into seven polyethylene-lined 55-gallon drums and placed into RCRA storage in TS-6 awaiting sampling to determine disposition.

Descriptions of additional actions and other information related to these releases are included as parts of other responses that follow.

Actions Taken/Designed to Prevent Recurrences:

In addition to the immediate actions regarding the two leaking boxes, the following actions have been taken or are being implemented to prevent recurrence of these types of incidents:

- A review of the inventory of stored containers on site was conducted in order to check if any additional metal boxes containing RCRA hazardous waste with free liquid were in storage. The inventory check identified 15 additional metal boxes containing RCRA hazardous/mixed waste with free liquid. The contents of these 15 metal boxes, plus the remaining contents of W170797 have all either been treated through the site's Advanced Waste Water Treatment facility or transferred to polyethylene-lined 55-gallon drums and placed in RCRA storage awaiting sampling to determine disposition. These actions are described more fully in the response to item #5 below.
- In addition to the inventory check for metal boxes containing RCRA hazardous waste with free liquid, a check was also conducted to identify any other containers holding this type of waste which were stored outside of RCRA storage areas. The check showed that all RCRA containers containing free liquids are in RCRA storage under cover. One 55-gallon drum, which was recently (11/09/99) characterized as containing this type of waste, was located in Area F of the Plant 1 Pad. Movement of this drum into RCRA storage has been added to an existing Task Order, and it is scheduled to be moved during the week of November 29, 1999
- Future utilization of mixed waste storage containers will be consistent with the provisions of the facility's Part B permit application as required by the Director's Findings and Orders (DF&O).
- The FEMP instituted a written Waste Storage and Sampling Project Long-Term Order on October 21, 1999 requiring that leaking containers be placed in secondary containment within 24 hours, and that supervisory personnel follow-up within five working days on corrective measures. The Order assigns responsibility for identified leaking containers from the time they are found until they have been repaired, overpacked or repacked, and placed into appropriate storage. The Order includes a Deteriorated Container Tracking Sheet, which will

- be utilized to assure that necessary corrective actions are completed for identified leaking containers.
- The FDF Waste Management Projects Division has drafted a new procedure (WM:PKGG-T-0021), which will clarify responsibilities and provide additional control and tracking for repackaging of mixed, low-level, uncharacterized waste, and nuclear material.
- An area in TS-6 has been designated for repackaging leaking and/or deteriorated RCRA containers. Use of this area will eliminate the need to conduct these types of operations in Building 71 in the future, and will provide more consolidated RCRA operations.
- During the period of November 9 through November 19, 1999, DOE-FEMP conducted an assessment of FDF implementation of operations policies, procedures, and training related to waste management operations. The assessment covered areas such as waste container selection and use, waste generation and storage, RCRA inspections/training/spill response, and Quality Assurance/Non-conformance Reports/Corrective Actions. This assessment was initiated in part in response to the leaking metal box incidents. DOE-FEMP and FDF are working jointly to address the issues identified as a result of the assessment.
- FDF personnel involved in inspections, spill response, repacking, movement, and storage have received briefings on the new Long-Term Order and will be retrained as necessary regarding responsibilities and thoroughness of corrective actions.

Information and Documentation:

The following items were requested from DOE-FEMP/FDF:

- *Copies of the TS-6 inspection forms initially reporting the leaking containers, (July 19, 1999 for W169457 and July 7, 1999 for W170797.*

Response: Attachment A contains copies of the weekly HWMU 20 inspection forms for the weeks of July 5, 1999 and July 19, 1999. The HWMU inspection forms are filed in the RCRA Operating Record. As shown in Attachment A, the inspection forms do not make any note of any leakage from the boxes. However, personnel did initially report the leaking metal box incidents for W169547 and W170797 on the TS-6 FEMP Container Inspection form, the Plant 1 Pad Supervisor's Log, and the AEDO Daily Event Logs as shown in Attachment A. The TS-6 Container Inspection Forms are maintained and filed by the Compliance and Inspection Operations Supervisor.

It should be noted that on the TS-6 inspection form for metal box W169457 the inspector noted that the box was to be moved to Building 71 for repair/repack. However, this transfer did not occur.

As a corrective action, the inspectors performing HWMU inspections of Plant 1 Pad will be retrained about the necessity of documenting container releases and associated follow-up actions on the HWMU Inspection Forms.

- *Additional documentation of inspections conducted in the areas where these containers were stored, (e.g., one inspection-log example for TS-6 and for Building 71/contamination area for the months of July, August, September, and October).*

Response: Attachments B and C contain the additional inspection forms requested by the Agency. A summary of the inspection activities that were documented for each metal box is outlined below.

Metal Box: W169457 (Initial leak - July 19, 1999)

On 7/19/99, metal box W169457 was reported leaking at TS-6. Attachment B provides an example of a TS-6 Container Inspection Form for the months of July, August, September, and October, as requested by the Agency. These particular inspection forms were selected by the facility because they display information pertaining to metal box W169457.

Metal Box: W170797 (Initial leak - July 7, 1999)

On 7/7/99, metal box W170797 was transferred from TS-6 to a portion of the Plant 1 pad, located between the West side of Building 71 and the Plant 1 Weather Shelter, 1B, to be repacked. While stationed at Building 71, biweekly container inspections were conducted and documented. On 10/7/99, a movement request was initiated, and metal box W170797 was transferred to TS-6.

Attachment C provides an example of a Container Inspection Form for TS-6 and Building 71 for the months of July, August, September, and October, as requested by the Agency. The inspection forms for TS-6 (dated 7/7/99 and 10/16/99) were selected by the facility because they display information pertaining to metal box W170797. The Building 71 container inspection forms for August and September were chosen at random (Note: No releases in the Building 71 area were observed or documented for metal box W170797.)

- *Relevant copies of the facility's RCRA Operating Record that document the tracking movement and placement of these containers during the period of July 1999 to present.*

Response: Electronic inventory and tracking systems for RCRA hazardous waste are specified in site procedure EW-0015, "FEMP RCRA Operating Record," to be maintained as supporting documents or extensions of the RCRA Operating Record.

The materials inventory system, which is part of the electronic Sitewide Waste Information Forecasting and Tracking System (SWIFTs), maintains a perpetual inventory of all materials on-site. Input to the system consists of the following material transactions: beginning inventory, additions, removals, adjustments, and transfer data. Source records that are generated by operations personnel are entered by Inventory Control personnel into SWIFTs.

For each metal box, tracking printouts from SWIFTs and copies of movement records (for metal box W170797) are displayed in Attachments D and E. Below is a further description of the information provided for each metal box.

Metal Box: W169457 (Initial leak - July 19, 1999)

Referring to Attachment D, the SWIFTs tracking database printout entitled *Container Inquiry*, shows that on 3/25/99, the location of metal box W169457 was inside TS-6. As of 10/27/99, this box shows a container status of "consumed," meaning the box is empty or is designated as a non-active container.

Metal Box: W170797 (Initial leak - July 7, 1999)

On 7/7/99, metal box W170797 was transferred from TS-6 to Building 71. This information is shown on the two copies of MC&A Material Movement Records in Attachment E. Referring to the printouts of the SWIFTs tracking database, metal box W170797 was located in Building 71 on 7/7/99, and was transferred to TS-6 on 10/07/99.

As of 11/4/99, metal box W170797 shows a container status of "consumed," meaning the liquids have been removed from the box, treated, and the box is no longer an active container (refer to SWIFTs printout entitled *Container Inquiry*).

- *Describe the rationale used to conclude that a reportable release had not occurred, including calculations related to RQ's and mass-balance.*

Response: Releases are evaluated in accordance with an established protocol following a checklist which includes information regarding the time and date of the release, who discovered/reported it, the location, material released, quantity, drum/container markings, whether it was released indoors or into the environment, a description of the event, and how the material was cleaned up and dispositioned. The information regarding the release is utilized by the Release Evaluator to determine if a regulated material is involved, the applicable reportable quantity, to calculate the amount of the regulated material released, and if the event is reportable under any applicable regulations. The evaluation

also addresses whether the RCRA Contingency Plan should be implemented and other recommended actions.

The following is a summary of the evaluation calculations for each of the containers that are the subject of the NOV:

Metal Box W170797: A visual inspection of the box on 10/13/99 confirmed that the box held five (5) inches of liquid and sludge, indicating that it lost approximately 4665 pounds of liquid to the Plant 1 Pad and site storm sewer system. This waste is characterized as RCRA hazardous for tetrachloroethylene (RCRA D039) at 41 ppm per Material Evaluation Form (MEF) #3301. Thus, 0.19 pounds (4665 lbs. @ 41 ppm = 0.19 lbs.) of tetrachloroethylene were potentially released into the environment.

Metal Box W169457: Again, complete box drainage was assumed, which is an estimated 5950 pounds of liquid released into the contained sump in TS-6. This was not considered a release to the environment. MEF #3301 applies to this waste also. Thus, 0.24 pounds (5950 lbs. @ 41 ppm = 0.24 lbs.) of tetrachloroethylene were potentially released. It was later determined that 3087 pounds of this liquid were potentially released from the sump to the surrounding soil under TS-6. This was considered a release to the environment, and was evaluated for comparison to the RQ. Calculating 3087 lbs. @ 41 ppm = 0.13 pounds of tetrachloroethylene potentially released into the environment.

For each of the events the estimated amount of uranium released was also calculated. The uranium concentration of the liquid is 0.01% (this is depleted in the isotope U235 @ 0.5%). For container W170797, the uranium released is 0.47 lbs. (4665 lbs. x 0.01%), for container W169457, the uranium released is 0.6 lbs. (5950 lbs. x 0.01%), and for the subsequent release from the TS-6 sump, the uranium released is 0.3 lbs. (3087 lbs. x 0.01%).

The RQ for tetrachloroethylene is 100 pounds. The RQ for uranium at 0.5% U235 is approximately 385 pounds. Thus, none of the potential releases of regulated materials into the environment during these events exceeded an applicable RQ.

- *Identify the quantity and location of hazardous waste liquids currently in storage in containers of this type. Identify the planned disposition and scheduling for any such wastes.*

Response: Fifteen (15) containers of this type in addition to the remaining contents in W170797 were identified which held RCRA hazardous/mixed waste with free liquid. Of these 15 metal boxes, seven (7) contained the same liquid contaminated with tetrachloroethylene as had been in the two boxes that leaked. The contents of these 7 containers and the remaining liquid in W170797 were transferred to Phase 2 of the site's Advanced Wastewater

Treatment (AWWT) system for treatment through the activated carbon organic treatment system. The contents of four (4) of the containers, which contained corrosive liquid, were also transferred to the AWWT for appropriate treatment. The remaining four boxes contained wastewater, which requires further analysis to determine if disposition through the AWWT can be completed. The contents of these four boxes have been transferred into polyethylene-lined 55-gallon drums. The drums are currently in RCRA storage in TS-6 awaiting sampling.

The liquid that was removed from the TS-6 sump was placed in seven polyethylene-lined 55-gallon drums, and is also currently in RCRA storage in TS-6 awaiting sampling.

Concerning whether there are other liquid RCRA containers that are being stored on Plant 1 Pad, a SWIFTS inventory search was performed. Results revealed that there are no other boxes, and all RCRA containers are in appropriate undercover storage. For any material that is characterized as RCRA liquids, the Characterization Change Notice Process currently in place ensures that the containers will be transferred to the appropriate storage location.

- *An evaluation of the integrity of the TS-6 trench drain and sump system, including plans and schedule for repairs if necessary.*

Response: A test plan for performing a hydrostatic test of the TS-6 sump is being developed. The test plan is scheduled to be completed by 11/29/99. It is anticipated that the test can be completed by 12/10/99, with a final report by 12/21/1999. Repairs to the sump, as determined in the test report, will be made as soon as practicable. OEPA will be advised of the schedule for any repairs as soon as it can be developed based on the test report.

- *An evaluation summary of anticipated actions related to RCRA/CERCLA integrated closure activity for the two (2) Hazardous Waste Management Units (HWMU) affected.*

Response: As a point of clarification, it should be noted that only one HWMU was involved in both these release events. Both TS-6, where W169457 leaked, and the area near Building 71, where W170797 leaked, are part of the Plant 1 Pad (HWMU 20).

In accordance with the RCRA/CERCLA DF&O, subsurface contamination associated with HWMU 20 will be addressed through the CERCLA remediation process. Cleanup and closure of the unit will be demonstrated through sampling, as appropriate, to comply with post-remedial levels for constituents of concern consistent with the Director's performance standards for closure of hazardous waste facilities. Plans and schedules for the remediation and final closure of

HWMU 20 will be included in the Area 3B Integrated Remedial Design Package (IRDP), which will be submitted to OEPA by April 1, 2002.

Issues and Concerns

- *Current facility RCRA Operating Log tasking protocols and related communications need to be evaluated and revised where necessary.*

Response: Problems such as the leaks, which are the subject of this NOV, are recorded in both the RCRA inspection logs and in supervisor's logs. The FEMP has implemented a new written Long-Term Order clarifying supervisory personnel responsibility for follow-up within five working days on corrective actions in response to reported leaking containers. Personnel have been briefed on the new Long-Term Order. (See response to Actions Taken/Designed to Prevent Recurrences above)

- *The facility concluded that a CERCLA release did not occur. A parallel, (if not primary) evaluation of release and/or emergency considerations subject to OAC 3745-65-51 and 3745-65-56, and Section G of the application should have also occurred.*

Response: The determination of potential harm to individuals or to the environment is a part of the process that the FEMP utilizes in evaluating events, responding, and reporting. This evaluation of releases for determining any potential immediate harm to individuals or the environment is, in fact, the initial evaluation that is performed at the FEMP for such events. The Assistant Emergency Duty Officer (AEDO), who provides initial response and evaluation of such releases, makes a determination based on all available information (container labels, Material Safety Data Sheets, plant personnel, experience, etc.), as to the potential for harm to personnel or to the environment, and the proper response for the situation. The CERCLA release evaluation follows this initial evaluation and is based in part on the AEDO log of events.

Implementation of the Contingency Plan is based upon classification of the event as an emergency and activation of the Emergency Operations Center (EOC). In these two events, the AEDO determined, based on the material, quantity, and areas in which the leaks occurred, that there was not a release that threatened human health or the environment. It was, therefore, not necessary to implement the Contingency Plan or emergency response procedures for these events.

As noted on the Fact Sheets previously submitted to OEPA, the releases/treatment of the liquids from these two boxes was not considered to have a significant impact on the environment.

Mr. Phillip C. Harris

-9-

2654

For container W170797, it is assumed the material was released to the pad over the three-month period from 7/7/99 to 10/7/99, and that it probably evaporated (during the extremely hot and dry weather) and/or leaked to the controlled storm drain system in this portion of the Plant 1 Pad. Calculations of a "worst case" scenario, involving the release of all the material in question into the controlled storm water drainage system, indicate the concentration of the constituent of concern (tetrachloroethylene) at the point of discharge to the Great Miami river would have been well below the Water Quality Standards in OAC 3745-1 (for aquatic life: Outside Mixing Zone Average = 73 ppb; for human health: based on drinking water = 320 ppb).

For container W169457, it is assumed that the approximately 370 gallons, which were not accounted for in the TS-6 sump, were released to the soil beneath the sump. The mobility of such low concentrations of tetrachloroethylene through the soil is limited, based on past FEMP ground water sampling experience. Concentrations of 500 ppm tetrachloroethylene in soil have been found on site with minimal transport. Any tetrachloroethylene released from the TS-6 sump would not be expected to be available for an off-site receptor.

Based on the above information the FEMP believes no significant environmental or human health impacts occurred from the releases. Further, the corrective actions described above should prevent such events from occurring in the future.

If you have any questions or require additional information, please contact Shannon Kaster of my staff at (513) 648-3157.

Sincerely,



Jack R. Craig, Director
DOE Fernald Area Office



John C. Bradburne, President
FERMCO

Enclosures

cc w/enclosures:

J. Reising, OH/FEMP
J. Sattler, OH/FEMP
T. Hagen, FDF/65-2
T. Walsh, FDF/65-2
C. Tellez, FDF/52-3
AR Coordinator/78

000009

**Attachment A: HWMU Inspection Forms, TS-6 Container Inspection Forms, and
copies of the Plant 1Pad Supervisor's Logs and the AEDO Daily Event Logs**

000010

WED

HWMU 20, PLANT 1 PAD

-- 2654

Active
Container Storage

Inspector's Signature: 	Badge #: 1353	Date: 7-7-99	Time: 1200
HWMU Facility Owner's Signature: 	Badge #: 1052	Date: 7-14-99	Time: 0900

Item No.	Item Description	Acceptable	Unacceptable	Observations/Corrective Actions To Be Completed
1	Signs: -Danger-Authorized Personnel Only -No Smoking or Open Flame -Emergency & Prior to Entry Contact -PCB Warning Label - posted at access points to designated storage facility	✓		
2	Boundary Markers (e.g., chains, rope)	✓		
3	Area Condition	✓		
4	Tension Support Structure Condition	✓		
5	Pad/Secondary Containment Condition	✓		
6	Safety Equipment	✓		
7	Emergency & Spill Response Equipment	✓		
8	Container Management	✓		
9	Reactivity Group Codes (RGCs)	✓		
10	Conditions Of Drums (Evidence Of Leaks Or Spills)	✓		

Comments: _____

Centralized Inspection Group Designee: <i>Gene Price</i>	Date: 1045 7-14-99
--	--------------------

HWMU 20, PLANT 1 PAD

WED

Active
Container Storage

Inspector's Signature: 	Badge #: 1801	Date: 7-21-99	Time: 1515
HWMU Facility Owner's Signature: 	Badge #: 10452	Date: 7-26-99	Time: 0700

Item No.	Item Description	Acceptable	Unacceptable	Observations/Corrective Actions To Be Completed
1	Signs: -Danger-Authorized Personnel Only -No Smoking or Open Flame -Emergency & Prior to Entry Contact -PCB Warning Label - posted at access points to designated storage facility			
2	Boundary Markers (e.g., chains, rope)	✓		
3	Area Condition	✓		
4	Tension Support Structure Condition	✓		
5	Pad/Secondary Containment Condition	✓		
6	Safety Equipment	✓		
7	Emergency & Spill Response Equipment	✓		
8	Container Management	✓		
9	Reactivity Group Codes (RGCs)	✓		
10	Conditions Of Drums (Evidence Of Leaks Or Spills)	✓		

Comments: ^{TS-} Eye Wash 4 ✓
^{TS-} 5 ✓ scale ✓
^{TS-} 6 ✓ scale ✓

Centralized Inspection Group Designee: 	Date: 7-26-99
--	---------------

FEMP CONTAINER INSPECTION FORM

Inspector's signature below verifies that all drums in this location have been inspected.

Inspector (print) [REDACTED] Inspector's Signature [REDACTED] Badge No. 1801 Date 7/19/99

Plant/Location TS6 Supervisor's Signature [REDACTED] Badge No. 10887 Date 7/20/99
CHECK ALL CONTAINERS IN THIS TENT STRUCTURE.

AREA	INVENTORY NO.	ROW/STACK LEVEL	DRUM COND. ACCEPTABLE		INSPECTION TIME	DATE/TIME CORRECTIVE ACTION <small>Type I only</small>	AEDO NOTIFIED Type I and II, Supervisors Initials	CONT. MGT. ACCEPTABLE	
			YES	NO				YES	NO
TS-C	W169457	Box		✓	0830	I 9 ⁰⁰	RD FOR MF		✓
TS-C	W500062	11-6-2		✓	1230	II 1315	RD FOR MF		✓
TS-C	W500030	11-6-2		✓		II 1320	RD FOR MF		✓

Note 1: Type 1 leakers must be corrected within 24 hours. Supervisor annotate Date/Time of Corrective Action.
 Note 2: For any containers that are unacceptable, record inventory number, area, row/stack/level.
 Note 3: Container management includes spacing, stacking, proper postings, label, or any condition which may need corrective action as it applies to material storage operations.

COMMENTS: White Box sent to 7/ for repack.
Drums sent to overpack
Ramp is repaired today.

Distribution: Transmit completed inspection forms to the Central Inspection Group.

-2654

000013

FEMP CONTAINER INSPECTION FORM

Inspector's signature below verifies that all drums in this location

Inspector (print) [REDACTED] Inspector's Signature [REDACTED]

Badge No. 1353 Date 7-7-99

Plant/Location TS6 Supervisor's Signature [REDACTED]

Badge No. 10574 Date 7/8/99

CHECK ALL CONTAINERS IN THIS TENT STRUCTURE.

AREA	INVENTORY NO.	ROW/STACK LEVEL	DRUM COND.		INSPECTION TIME	DATE/TIME CORRECTIVE ACTION <small>Type I only</small>	AEDO NOTIFIED <small>Type I and II, Supervisors initials</small>	CONT. MGT. ACCEPTABLE	
			YES	NO				YES	NO
TS6	170797	R22/S10/L2		✓	0715	7-7-99 <i>TS</i>	<i>TS</i>		✓

- Note 1: Type 1 leakers must be corrected within 24 hours. Supervisor annotate Date/Time of Corrective Action.
- Note 2: For any containers that are unacceptable, record inventory number, area, row/stack/level.
- Note 3: Container management includes spacing, stacking, proper postings, label, or any condition which may need corrective action as it applies to material storage operations.

COMMENTS: WHITE METAL BOX (170797) WAS LEAKING - BOX TRANSFERED TO BLDG #71

Distribution: Transmit completed inspection forms to the Central Inspection Group.

000014

37

PROJECT NAME

2654

NOTEBOOK NO.

7/13/99

ONE TYPE 1 LEAKER WAS FOUND BY BERNARD MAYES IN TS-6 AT 12:45. THE INV # W504962. THE LOT CODE R095-NXA-0068-0019. THE MEF 2000. DRUM # 6. LESS THAN 6 OUNCES OF CRYSTAL MATERIAL WAS FOUND AND CONTAMINATION WAS FOUND. THE WEIGHTS ARE GROSS 268 TARE 85 AND NET 183. THE DRUM WAS PULLED AND SENT TO OVERPACK.

7/14/99

ONE TYPE 2 LEAKER WAS FOUND BY HAROLD STRUNK IN TS-5 AT 2:40. THE INV # 13 W065047. THE LOT CODE IS S125-714-0065-0302. THE DRUM # IS 12. THE MEF IS 2000. NO LEAKAGE WAS FOUND AT THIS TIME. CONTAMINATION ON THE DRUM AND SKID WAS 1.6K. THE WEIGHTS ARE GROSS 548, TARE 76 NET 472. THE AEDO LOG NUMBER IS 99-07-411.

7/15/99

ONE TYPE 1 LEAKER FOUND IN TS-6 BY BERNARD MAYES AT 08:40. INV # W504880, LOT # R095-NXA-0068-0016, DR # 24, MEF # 2000. ABOUT 2% OF LIQUID. 1 PIG USED. NO CONTAMINATION FOUND. TYPE 055 CONTAINER, GROSS 330, TARE 84, NET 246. SENT TO OVERPACK. AEDO LOG # 99-07-476.

7/19/99

ONE TYPE 1 LEAKER WAS FOUND IN BUILDING 71 BY BERNARD MAYES AT 08:30. INV # W504825, LOT # R095-NXA-0068-0016, DR # 17, MEF 2000. ABOUT 3 OZ LIQUID. 1 PIG WAS USED. NO CONTAMINATION WAS FOUND. TYPE 85 GALLON CONTAINER, GROSS 404, TARE 162, NET 242. SENT TO OVERPACK. AEDO LOG 99-07-483.

7/19/99

ONE TYPE 1 LEAKER WAS FOUND IN TS 6 BY DEBBIE PETERS AT 2:30. INV # W169457. LOT # R05D-100-P013-A435. DR # 7. MEF 03301. ABOUT 6 OUNCES OF LIQUID. 4 PIGS WERE USED. NO CONTAMINATION WAS FOUND. TYPE 306 CONTAINER, GROSS 616, TARE 870 NET 546. SENT TO BLDG 71 FOR REPAIR. REPACK, AEDO LOG # 99-07-483.

7/17/99

ONE TYPE 2 LEAKER WAS FOUND IN TS-6 BY BERNARD MAYES AT 12:30. THE INV # W500050. THE LOT CODE R095-735-7015-0306. THE DRUM # 2. MEF 50051. NO LEAKAGE AT THIS TIME. CONTAINER TYPE 085 GAL. GROSS 501 TARE 128 NET 373. NO CONTAMINATION WAS FOUND. AEDO LOG # 09-07-483.

7/19/99

ONE TYPE 2 LEAKER WAS FOUND IN TS-6 BY BERNARD MAYES AT 12:30. THE INV # W500052. THE LOT CODE R095-735-7015-0306. THE DRUM # 2. MEF 50051. NO LEAKAGE AT THIS TIME. GROSS 323 TARE 128 NET 195. NO CONTAMINATION WAS FOUND. CONTAINER IS 085 GALLON. AEDO # 99-07-483. Michael Fahn

7/20/99

ONE TYPE 1 LEAKER WAS FOUND IN TS-5 BY M. LEE AT 9:10. THE INV # 060424. THE LOT CODE S103-FTR-0069-6996. THE MEF 60309. DR # 2. TYPE 55 GALLON. GROSS 188, TARE 87 NET 101. CONTAMINATION FOUND 3K. AEDO LOG NUMBER 99-07-483.

7/20/99

ONE TYPE 1 LEAKER WAS FOUND BY M. LEE IN TS-5 AT 9:45. INV # W060428. LOT # S103-FTR-0069-6996. DR # 2. MEF 60309. CONTAMINATION FOUND 4K. 55 GALLON DRUM. GROSS 193 TARE 81 NET 112. THE AEDO LOG NUMBER IS 99-07-483.

7/21/99

ONE TYPE 1 LEAKER WAS FOUND BY BERNARD MAYES AT 11:30. THE INV # W506023. THE LOT # R125-NXA-0068-0005. THE MEF 2000. DR # 32. NO CONTAMINATION FOUND. G-124 T-85-N-329. 85 GALLON CONTAINER WAS PULLED. AEDO LOG 99-07-483.

SIGNATURE

READ AND UNDERSTOOD

000015

DATE

19

DATE

19

6-17-99 One Type II found in TS-6 by B. Mays
INV# 504968 LOT# R125-HXA-0068-0005
DR#6 MEF 20007 NO CONTAMINATION FOUND
Pulled sent to overpack LOG-99-06-424

6-17-99 one Type II found in TS-6 by B. Mays
INV# W 504874 LOT# R095-HXA-0068-0018
DR#16 MEF-20007 NO CONTAMINATION FOUND
Pulled sent to overpack LOG# 99-06-424

6-17-99 one Type I Leaker found in TS-6 by
C. HONARD INV# W 504954 LOT# R095-HXA-0068-
0017 DR#4 MEF-20007 1 oz. Dry NO CONT-
amination found pulled and sent to
overpack LOG 99-06-426

6-23-99 One Type ONE LEAKER WAS FOUND BY MERRILL LEE IN B(A) AREA. THE INV # IS
W174700, THE LOT CODE IS W 050-100-P042-0435 DRUM # IS THIS
DRUM IS UNCHARACTERIZED LIQUID LESS THAN 1 OZ. NO CONTAMINATION WAS
FOUND. THE CONTAINER IS A 55 GALLON METAL DRUM. DRUM WAS PULLED AND
SENT TO OVERPACK.

6/23/99 THE AEDO LOG NUMBER ON PREVIOUS ENTRY IS 99-06-429

6/30/99 ONE TYPE I LEAKER WAS FOUND IN C-AREA BY MERRILL LEE AT 8:00.
THE INV # IS W30641. THE LOT CODE IS W095-900-V003-0407. DRUM NO
IS 1. LESS THAN 1 OZ. NO CONTAMINATION WAS FOUND. THE AEDO LOG NUMBER
IS 99-06-441. THE DRUM WAS PULLED AND SENT TO OVERPACK.

6/30/99 ONE TYPE I LEAKER WAS FOUND IN TS-6 BY BERNARD MAYS AT 8:40. THE INV #
IS W510081. THE LOT CODE IS X888-620-0061-0295. DRUM NO IS 20.
LESS THAN 1 OZ LIQUID. NO CONTAMINATION WAS FOUND. THE AEDO LOG NUMBER
IS 99-06-442. THE CONTAINER IS 0.5 GALLON.

6/30/99 ONE TYPE I LEAKER WAS FOUND IN TS-6 BY CECIL HEARD AT 12:30. THE INV #
IS W506014. THE LOT CODE IS R125-HXA-0068-0013. DRUM NO 8. MEF #
20007. LESS THAN 1 OZ. NO CONTAMINATION WAS FOUND. THE AEDO NOTIFICATION
NUMBER IS 99-06-444. THE CONTAINER IS 5 GALLON.

7/7/99 One Type I leaker found in TS-6 by Tim Wells at 0740. INV. # W170797,
Lot# R050-100-P013-A435, Dr.#1, MEF# 3301, About 8 oz. of liquid.
16K of contamination found. 2 pigs used. Tube 306 container.
Gross 6075, Tare 870, Net 5205, Sent to Bldg. 71 for repackage.
AEDO Log # 99-07-454.

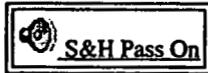
7/13/99 One Type 2 Leaker was found by Bernard Mays in TS-6 at 13:30. THE INV # W502591
THE LOT CODE R037-775-D068-0276. THE MEF # 30010 THE DRUM # ? NO LEAKAGE
AT THIS TIME. THE AEDO # 99-07-469. THE DRUM WAS SENT TO BE OVERPACKED
WEIGHTS ARE GROSS-632 TARE 125 NET 507.

7/13/99 One Type 2 Leaker was found by Bernard Mays in TS-6 at 13:30. THE INV # W506638
THE LOT CODE - R050-100-P039-0350. THE MEF # [REDACTED] THE INV # 2 NO LEAKAGE
AT THIS TIME. THE AEDO # 99-07-469 THE DRUM WAS SENT TO BE OVERPACKED
WEIGHTS ARE GROSS 700 TARE 146 NET 554.

SIGNATURE _____ DATE _____ 19____
READ AND UNDERSTOOD _____ DATE _____ 19____

000016

2654



AEDO'S DAILY EVENT LOG

Created On: 07/20/99 03:21 AM Entered By: Timothy W. Johnson

PERSONNEL:

AEDO: Robert Duckworth AEDO Badge #:
EDO: Stephen Beckman

EVENT:

Event Log Number: 99-07-483

Date Discovered: 07/19/99

Time Discovered: 08:50:00

Type of Event: Loggable Event

Contact Person: M. Fehr

Event Description: Two type 1 containers identified at Plant operations at TS - 6 a 306 container released 6 oz. LOT R050 - 100 - P 013 - A 435, # 7; INV. W 169457, MEF. - 03301. At Bldg. 71 a 085 container released 3 oz. LOT. R 095 - HXA - 0068 - 0016, # 17; INV. W 504875, MEF. 20007.

NOTIFICATION:

Release Evaluator Notified: Yes

Area Monitoring Directed: Yes

Modified By: Timothy W. Johnson/FERMCO On: 07/20/99 03:30 AM

Edit History (Only past five edits are shown)

: Rev. Editor Edit Date

0. Timothy W. Johnson/FERMCO 07/20/99 03:30:39 AM

000017



AEDO'S DAILY EVENT LOG

Created On: 07/08/99 04:33 AM Entered By: Timothy W. Johnson

PERSONNEL:

AEDO: Donald McCool AEDO Badge #:
EDO: Stuart Hinnefeld

EVENT:

Event Log Number: 99-07-454

Date Discovered: 07/07/99

Time Discovered: 07:40:00

Type of Event: Loggable Event

Contact Person: T. Sparks

Event Description: Type 1 306 container at TS - 6 INV. # W170797 LOT R 050 - 100 - P 013 - A
435 # 1 MEF 3301 Approx. 8 oz. liquid 16K dpm per Cm2 beta, Gamma. Sent to Repackaging
station.

NOTIFICATION:

Release Evaluator Notified: Yes

Area Monitoring Directed: Yes

Modified By: Timothy W. Johnson/FERMCO On: 07/08/99 04:39 AM

Edit History (Only past five edits are shown)

: *Rev. Editor Edit Date*

0. Timothy W. Johnson/FERMCO 07/08/99 04:39:08 AM

000018

2654

Attachment B: Examples of TS-6 Container Inspection Forms for Metal Box W169457

000019

FEMP CONTAINER INSPECTION FORM

Inspector's sign [redacted] all drums in this location have been inspected.

Inspector (print) [redacted] Inspector's Signature [redacted] Badge No. [redacted] Date 7/19/99

Plant/Location TS6 Supervisor's Signature [redacted] Badge No. [redacted] Date 7/20/99

CHECK ALL CONTAINERS IN THIS TENT STRUCTURE.

AREA	INVENTORY NO.	ROW/STACK LEVEL	DRUM COND. ACCEPTABLE		INSPECTION TIME	DATE/TIME CORRECTIVE ACTION Type I only	AEDO NOTIFIED Type I and II, Supervisors Initials	CONT. MGT. ACCEPTABLE	
			YES	NO				YES	NO
TS-C	W169457	Box		✓	0830	I 9 ⁰⁰	RD FOR MF		✓
TS-C	W500062	11-6-2		✓	1230	II 1315	RD FOR MF		✓
TS-C	W500030	11-6-2		✓		II 1320	RD FOR MF		✓

- Note 1: Type 1 leakers must be corrected within 24 hours. Supervisor annotate Date/Time of Corrective Action.
- Note 2: For any containers that are unacceptable, record inventory number, area, row/stack/level.
- Note 3: Container management includes spacing, stacking, proper postings, label, or any condition which may need corrective action as it applies to material storage operations.

COMMENTS: White Box sent to 7/ for repack.
Drums sent to overpack
Ramp is repaired today.

Distribution: Transmit completed inspection forms to the Central Inspection Group.

000020

FEMP CONTAINER INSPECTION FORM

Inspector's signature below verifies that all drums in this location

Inspector (print) _____ Inspector's Signature _____

Badge No. _____ Date 8-3-99

Plant/Location TS6 Supervisor's Signature _____

Badge No. _____ 8-4-99

CHECK ALL CONTAINERS IN THIS TENT STRUCTURE.

AREA	INVENTORY NO.	ROW/STACK LEVEL	DRUM COND. ACCEPTABLE		INSPECTION TIME	DATE/TIME CORRECTIVE ACTION Type I only	AEDO NOTIFIED Type I and II, Supervisors Initials	CONT. MGT. ACCEPTABLE	
			YES	NO				YES	NO
<u>TS-6</u>			<input checked="" type="checkbox"/>	<input type="checkbox"/>	<u>0900</u>			<input checked="" type="checkbox"/>	<input type="checkbox"/>

Note 1: Type 1 leakers must be corrected within 24 hours. Supervisor annotate Date/Time of Corrective Action.

Note 2: For any containers that are unacceptable, record inventory number, area, row/stack/level.

Note 3: Container management includes spacing, stacking, proper postings, label, or any condition which may need corrective action as it applies to material storage operations.

COMMENTS: Box no. 7 is leaking w/169457
Row 25 Stack 4 Level 3 A dr needs op.

Distribution: Transmit completed inspection forms to the Central Inspection Group.

8-4-99 will contact P#1 Supervisor to have box moved to #71 for re-work.
will check Row 25.

000021

2654

FEMP CONTAINER INSPECTION FORM

Inspector's signature below verifies that all drums in this location have been inspected.

Inspector (print) [REDACTED] Inspector's Signature [REDACTED] Badge No. [REDACTED] Date 9-14-99
 Plant/Location TS-6 (RCRA) Supervisor's Signature [REDACTED] Badge No. [REDACTED] Date 9-14-99

INSPECT ALL RCRA CONTAINERS IN TS-6

AREA	INVENTORY NO.	ROW/STACK LEVEL	DRUM COND. ACCEPTABLE		INSPECTION TIME	DATE/TIME CORRECTIVE ACTION <small>Type I only</small>	AEDO NOTIFIED <small>Type I and II, Supervisor's Initials</small>	CONT. MGT. ACCEPTABLE	
			YES	NO				YES	NO
TS-6	169458	Row 24 Stack level 3	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	1300		SM	<input checked="" type="checkbox"/>	
TS-6	510622	Row 25 Stack level 1				9/14/99/1430	SM	<input checked="" type="checkbox"/>	

000022

- Note 1: Type 1 leakers must be corrected within 24 hours. Supervisor annotate Date/Time of Corrective Action.
- Note 2: For any containers that are unacceptable, record inventory number, area, row/stack/level.
- Note 3: Container management includes spacing, stacking, proper postings, label, or any condition which may need corrective action as it applies to material storage operations.

COMMENTS: 169458 is 306 Type container, using pigs to catch liquid until it can be patched

Distribution: Transmit completed inspection forms to the Central Inspection Group.

FEMP CONTAINER INSPECTION FORM.

Inspector's signature below verifies that all drums in this location have been inspected

Inspector (print) [redacted] Inspector's Signature [redacted] Badge No. [redacted] Date 10-16-99
 Plant/Location TS- 6 Supervisor's Signature [redacted] Badge No. [redacted] Date 10-17-99

INSPECT ALL NON-RCRA CONTAINERS IN TENT

AREA	INVENTORY NO.	ROW/STACK LEVEL	DRUM COND. ACCEPTABLE		INSPECTION TIME	DATE/TIME CORRECTIVE ACTION Type I only	AEDO NOTIFIED Type I and II, Supervisors Initials	CONT. MGT. ACCEPTABLE	
			YES	NO				YES	NO
			✓		0830			✓	

- Note 1: Type 1 leakers must be corrected within 24 hours. Supervisor annotate Date/Time of Corrective Action.
- Note 2: For any containers that are unacceptable, record inventory number, area, row/stack/level.
- Note 3: Container management includes spacing, stacking, proper postings, label, or any condition which may need corrective action as it applies to material storage operations.

COMMENTS: Pigs that are bagged and affixed with a Rad. Material label need to be disposed or stored. These bags are at the east side of the tent. WMB W169457 has stopped leaking and needs to be moved from the drain

Distribution: Transmit completed inspection forms to the Central Inspection Group.

10-17-99 Plant #1 Supervision will be notified to take care of the above by C.C. mail today (see attached C.C. mail)

000023

2654



Author: Glen Price at FNST-06

Date: 10/17/99 10:25 AM

Normal

TO: Allen Elam at FNST-01, Michael Fehr at FNST-05, Tim E Sparks at FNST-04, John J Fitzgerald at FNST-03,
Kevin Crosson at FNST-02

CC: Glen Price

Subject: USED PIGS AND WMB W169457

----- Message Contents

Hi GUYS:

It was noted on Saturdays inspection of TS-6 by Cecil Heard that there are bags of pigs affixed with rad material labels need to be disposed or stored , these bags are on the eastside of the tent. He also stated that the box has stopped leaking that was sat on the drain and needs to be removed for proper disposal. (W169457).

Glen.....

000024

--2654

Attachment C: Examples of TS-6 and Building 71 Container Inspection Forms for Metal
Box W170797

Handwritten mark

000025

FEMP CONTAINER INSPECTION FORM

Inspector's signature below verifies that all drums in this location have been inspected.

Inspector (print) [REDACTED] Inspector's Signature [REDACTED] Badge No. [REDACTED] Date 7-7-99

Plant/Location TS6 Supervisor's Signature [REDACTED] Badge No. [REDACTED] Date 7/8/99
 CHECK ALL CONTAINERS IN THIS TENT STRUCTURE.

AREA	INVENTORY NO.	ROW/STACK LEVEL	DRUM COND. ACCEPTABLE		INSPECTION TIME	DATE/TIME CORRECTIVE ACTION <small>Type I only</small>	AEDO NOTIFIED <small>Type I and II, Supervisors initials</small>	CONT. MGT. ACCEPTABLE	
			YES	NO				YES	NO
TS6	170797	R22/S10/L2		✓	0715	7-7-99 <i>TS</i>	TS		✓

Note 1: Type 1 leakers must be corrected within 24 hours. Supervisor annotate Date/Time of Corrective Action.

Note 2: For any containers that are unacceptable, record inventory number, area, row/stack/level.

Note 3: Container management includes spacing, stacking, proper postings, label, or any condition which may need corrective action as it applies to material storage operations.

COMMENTS: WHITE METAL BOX (170797) WAS LEAKING - BOX TRANSFERED TO BLDG #71

Distribution: Transmit completed inspection forms to the Central Inspection Group.

000026

FEMP CONTAINER INSPECTION FORM

MON

Inspector's signature below verifies that all drums in this location

Inspector (print)

[Redacted]

Inspector's Signature

[Redacted]

Badge No.

[Redacted]

8-9-99

Plant/Location

BLDG # 71

Supervisor's Signature

Badge No.

[Redacted]

Date

8-10-99

INSPECT, DOCK AREA AND INSIDE BUILDING

AREA	INVENTORY NO.	ROW/STACK LEVEL	DRUM COND. ACCEPTABLE		INSPECTION TIME	DATE/TIME CORRECTIVE ACTION Type I only	AEDO NOTIFIED Type I and II, Supervisors Initials	CONT. MGT. ACCEPTABLE	
			YES	NO				YES	NO
inside			✓		0800			✓	
outside	PaD		✓					✓	

Note 1: Type 1 leakers must be corrected within 24 hours. Supervisor annotate Date/Time of Corrective Action.

Note 2: For any containers that are unacceptable, record inventory number, area, row/stack/level.

Note 3: Container management includes spacing, stacking, proper postings, label, or any condition which may need corrective action as it applies to material storage operations.

COMMENTS:

Distribution: Transmit completed inspection forms to the Central Inspection Group.

000027

FS-F-4174-RV1 (01/21/98)

2654

FEMP CONTAINER INSPECTION FORM

Inspector's signature below verifies that all drums in this location are

Inspector (print) _____ Inspector's Signature _____

Badge No. _____ Date 9/7/99

Plant/Location BLDG # 71 Supervisor's Signature _____

Badge No. _____ Date 9-8-99

INSPECT: DOCK AREA AND INSIDE BUILDING

MONDAYS + FRIDAYS

AREA	INVENTORY NO.	ROW/STACK LEVEL	DRUM COND. ACCEPTABLE		INSPECTION TIME	DATE/TIME CORRECTIVE ACTION Type I only	LEDO NOTIFIED Type I and II, Supervisor's Initials	CONT. MGT. ACCEPTABLE	
			YES	NO				YES	NO
<u>inside</u>			<input checked="" type="checkbox"/>		<u>0800</u>			<input checked="" type="checkbox"/>	
<u>outside</u>			<input checked="" type="checkbox"/>					<input checked="" type="checkbox"/>	

- Note 1: Type I leaks must be corrected within 24 hours. Supervisor annotate Date/Time of Corrective Action.
- Note 2: For any containers that are unacceptable, record inventory number, area, row/stack/level.
- Note 3: Container management includes spacing, stacking, proper postings, label, or any condition which may need corrective action as it applies to material storage operations.

COMMENTS: _____

Distribution: Transmit completed inspection forms to the Central Inspection Group.

000028

FEMP CONTAINER INSPECTION FORM

Inspector's signature below verifies that all drums in this location

Inspector (print)

Inspector's Signature

Badge No.

Date 10-16-99

Plant/Location

TS-6 (RCRA)

Supervisor's Signature

Badge No.

Date 10-27-99

INSPECT ALL RCRA CONTAINERS IN TS-6

AREA	INVENTORY NO.	ROW/STACK LEVEL	DRUM COND. ACCEPTABLE		INSPECTION TIME	DATE/TIME CORRECTIVE ACTION Type I only	AEDO NOTIFIED Type I and II, Supervisor's initials	CONT. MGT. ACCEPTABLE	
			YES	NO				YES	NO
			✓		1200			✓	

Note 1: Type 1 leakers must be corrected within 24 hours. Supervisor annotate Date/Time of Corrective Action.

Note 2: For any containers that are unacceptable, record inventory number, area, row/stack/level.

Note 3: Container management includes spacing, stacking, proper postings, label, or any condition which may need corrective action as it applies to material storage operations.

COMMENTS: WHB # 483048 INV. # 170797 NO SIGN OF LEAKAGE

Distribution: Transmit completed inspection forms to the Central Inspection Group.

000029

FS-F-4174-RV1 (01/21/98)

2654

Attachment D: SWIFTs Tracking Database Printout for Metal Box W169457

000030



2654

Inventory No	W169457	Lot ID	R050	100	P	013	A435	000007	Cont Type	340
Overpack Inv		Material	CONTAMINATED SOLVENT OR ORGANIC						MBA	930
Waste Type	RCRA	Loc/Area	0001	TS6	22	8	1	Gross Wt	870	
Serial No	482734	R/E/S/L							Tare Wt	870
Status	CONSUMED	Cont Commit	WATER CONT. WITH PERCHLORETHYL						Net Wt	0
Requisition No		Inv. Cont	WEIGHT ADJUSTMENT DUE TO THIS CO							
		Project	156	Descr	RESIDUE PACKAGING - PLANT 1					

Detail	Dates	Overpack	Repack	Mel/Epa	Prof/App	Isotopic	RTB
--------	-------	----------	--------	---------	----------	----------	-----

Modification Dates

Status Date	10/27/1999	By	OPSMCAHLC	MBA Date	07/16/1998	By	OPSMCAHLC
Lot ID Date	06/08/1998	By	OPSMCACJS	Prod Date	03/27/1998	By	OPSMCALJL
Ws Type Date	05/04/1998	By	OPSMSECBAS	Cont Issue Date		By	
Overpack Date		By		Cont recd Date	06/05/1997	By	OPSMCAMMC
Location Date	03/25/1999	By	OPSMCAHLC	Ws Accum Date	03/27/1998		

Print Count: 1

**Attachment E: Copies of MC&A Material Movement Records and SWIFTs Tracking
Database Printouts for Metal Box W170797**

000032

Sitewide Waste Information, Forecasting, and Tracking System

November 22, 1999

Loc.	Area	Row	X	St	Lv	Inv No	Serial No	Prod.	Sou	Cl	Mat	Seq	Item No	Loc	Area	Row	St	Lv	Loc Assign Date	
0001	TS6	24		3	1	W170797	483048	R050	100	P	013	A435	000001	0079						
							483048	R050	100	P	013	A435	000001	0079	BAY A	4	1	1	7/16/1998 12:00:00	
							483048	R050	100	P	013	A435	000001	0001	TS6	22	10	2	3/25/1999 12:00:00	
							483048	R050	100	P	013	A435	000001	0071						7/7/1999 12:00:00
							483048	R050	100	P	013	A435	000001	0001	TS6	24	4	1	10/7/1999 3:25:36	

Area Total 1

Grand Total Records Selected 1

000033



Inventory No	W170797	Lot ID	R050	100	P	013	A435	000001	Cont Type	340
Overpack Inv		Material	CONTAMINATED SOLVENT OR ORGANIC						MBA	930
Waste Type	RCRA	Loc/Area	0001	TS6	24	3	1	Gross Wt	870	
Serial No	483048	R/Ex/S/L	WEIGHT ADJUSTMENT DUE TO CONTAI						Tare Wt	870
Status	CONSUMED	inv. Cont	REMAINING CONTENTS(853 LBS) SENT						Net Wt	0
Requisition No	4281	Project	156	Descr						RESIDUE PACKAGING - PLANT 1

Modification Dates

Status Date	11/04/1999	By	OPSS\$MCAHLC	MBA Date	07/16/1998	By	OPSS\$MCAHLC
Lot ID Date	06/08/1998	By	OPSS\$MCACJS	Prod Date	03/27/1998	By	OPSS\$MCALJL
Ws Type Date	05/04/1998	By	OPSS\$SECBAS	Cont Issue Date	12/03/1997	By	
Overpack Date		By		Cont recd Date	08/25/1997	By	OPSS\$MCAMMC
Location Date	10/11/1999	By	OPSS\$MCAHLC	Ws Accum Date	03/27/1998		

Print Count *1