

Exhibit 16

PCB Decontamination Work Plan
Southern Iowa Mechanical Site
3043 Pawnee Drive
Ottumwa, Iowa

Submitted to



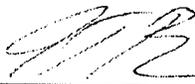
USEPA Region VII
Iowa/Nebraska Remedial Branch
Superfund Division
901 North Fifth Street
Kansas City, Kansas 66101

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Prepared by



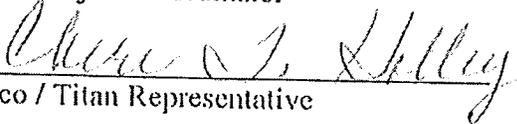
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GES Project Coordinator

May 27, 2009

Date



Dico / Titan Representative

May 27, 2009

Date

EPA Remedial Project Manager (RPM)

Date

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- Attachment 1 – Quality Assurance Project Plan
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1.0 INTRODUCTION

1.1 Purpose

This Work Plan (WP) addresses the cleanup measures for traces of Polychlorinated Biphenyls (PCBs) impacted adhesive areas identified on the metal beams at the Southern Iowa Mechanical Site (Site) in Ottumwa, Iowa. Greenleaf Environmental Services, LLC (GES) has been engaged by Mark Johnson of Stinson Morrison Hecker LLP, whose clients are Dico, Inc., and Titan Tire Corporation (collectively Dico/Titan), to perform removal actions at the Site in accordance with the Unilateral Administrative Order (UAO) for Removal Response Activities issued by the United States Environmental Protection Agency (EPA) Region VII. This WP has been prepared for EPA Region VII by GES and sets forth the procedures to be used by GES and its selected subcontractors in execution of the work. The WP includes details of the PCB remediation measures, including technical approach, project staffing and key responsibilities, equipment and material requirements, and specific operating procedures. Also included in the WP are the proposed project schedule, the Site Specific Health and Safety Plan (HASP), and Quality Assurance Project Plan (QAPP).

It is recognized that during the project it may be necessary to alter procedures to fit existing conditions. All concerned parties, including the EPA Remedial Project Manager (RPM), GES Project Coordinator and GES Health and Safety Officer, will be notified of changes in WP procedures. Modifications to procedures outlined in the WP or its attachments will be implemented after receipt of written approval by the RPM.

1.2 Site Background

Southern Iowa Mechanical (SIM) operates an industrial maintenance contracting business on the Site located at 3043 Pawnee Drive in Ottumwa, Iowa. The Site is situated on approximately 2.6 acres in an industrial park area where the surrounding land use is predominantly industrial. On May 16, 2008, EPA conducted an assessment at the Site. EPA alleged that it found PCB contamination present in the location of adhesion areas of old insulation on identified areas of the steel beams stockpiled on the property at concentrations exceeding the standards (1) applicable to non-liquid PCB contamination on non-porous surfaces in high occupancy areas per 40 CFR 761.61(a)(4)(ii) of 10 ug/100cm² (the low occupancy area standard is 100 ug/100cm²); and (2) in one sample of site soils under the metal beam stockpile areas in excess of 1 mg/kg designated for high occupancy areas per 40 CFR 761.61(a)(4)(i)(A) (the low occupancy area standard is 25 mg/kg). In EPA's Quality Assurance Project Plan ("QAPP") for the May 16, 2008 assessment, EPA declared that the standards for "low occupancy areas" should be applied to the Site. (*Dico/Titan reserve their position that EPA's choice of the high occupancy standards is incorrect*). In June or July 2008 at the EPA's request, SIM installed a temporary fence to restrict access to the metal beam stockpile areas, which constitutes the only previous action taken at the Site.

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EPA's current UAO requires removal of any visible insulation and adhesive residues and decontamination of portions of the metal beams where PCB is believed to be present from the use of adhesive to attach the old insulation backing that EPA tests allegedly showed a concentration exceeding 10 ug/100cm² (the high occupancy standard stated above) as specified in 40 CFR 761.79(b)(3)(i)(B), which is decontamination by scarification for "non-porous surfaces in contact with non-liquid PCBs." (*Dico/Titan reserve their position that EPA's choice of the non-liquid standard is incorrect*) In addition, the soil beneath the current metal beam stockpiles will be sampled to verify they do not exceed the 1 mg/kg PCB cleanup standard for bulk remediation waste in high occupancy areas as specified in 40 CFR 761.61(a)(4)(i)(B).

Dico/Titan desire to include the following disclaimer. Dico/Titan object to the EPA's letter of March 18, 2009, and to the EPA's actions in Dico/Titan letter of January 16, 2009, and previous correspondence, in the administrative record. Dico/Titan deny any liability and object to EPA's selection of the response action, and nothing herein shall be deemed an admission of any fact or a waiver of any right. Dico/Titan formally request that the Work Plan of February 13, 2009 and any subsequent revisions be included in the administrative record.

1.3 Project Objectives

In general, GES will furnish the following services to complete the removal response activities at the Site:

1. Preparation of a project Health and Safety Plan (HASP), Quality Assurance Project Plan (QAPP) and any other required documents prior to mobilization;
2. Mobilization of personnel, supplies and equipment to the Site;
3. Site preparation and establishment of work zones;
4. Set up segregation and decontamination staging areas;
5. Remove metal beams from existing site stockpiles for segregation and decontamination;
6. Visual identification of all areas impacted by adhesive or backing tape on all sides and lengths of the metal beams;
7. Remove visible insulation and adhesives residues from the metal beams;
8. Decontaminate the portions of metal beams identified above in (7) to meet the requirements set in 40 CFR 761.79 for non-porous surfaces in contact with non-liquid PCBs (including non-porous surfaces covered with a porous surface, such as paint), to Visual Standard No. 2, Near-White Blast Cleaned Surface Finish, of the National Association of Corrosion Engineers (NACE). A person shall verify compliance with standard No. 2 by visually inspecting all cleaned areas {40 CFR 761.79(b)(3)(i)(B)};
9. Confirmatory soil sampling under existing metal beam stockpile areas to compare to regulatory low occupancy area defined in 40 CFR 761.61(a)(4)(i)(B);
10. Excavate soils in existing metal beam stockpile areas exceeding 1 mg/kg PCBs;

11. PCBs physically separated from regulated waste during decontamination by abrading or physical removal, are regulated for disposal at their original concentration. {40 CFR 761.79 (g)(2)}
12. Complete consolidation, transportation and disposal of all waste generated during removal activities; and
13. Complete site restoration, cleanup and demobilization.

As project activity is implemented at the site, the Project Manager (PM) will allocate site resources as defined in this Work Plan. GES recognizes that out-of-scope work may be required on the Site and is prepared to add resources as required to complete the removal activity objectives. The PM will ensure that work not planned in the original scope is identified and brought to Dico/Titan and EPA's attention. Such work will only be performed with Dico/Titan's approval and issuance of a proper Change Order. (In emergency cases, where not performing the work will cause a threat to the environment or human health, GES will perform the necessary work and notify the EPA as soon as possible.)

1.4 Regulatory Compliance

Since hazardous substances allegedly exist at the site, it is expected that there will be some requirements for sampling, testing, and disposal of hazardous substances according to TSCA. The QAPP for this Work Plan provides the guidance and directives to ensure that GES performs sampling and analysis tasks in compliance with all EPA protocols. The QAPP is included as **Attachment 1** of this Work Plan. GES sampling activities and laboratory analysis will be performed using methods and techniques developed or recognized by EPA, including sample collection, identification, preservation, chain-of-custody, shipping, and storage procedures. Analytical procedures, including quality control requirements, will be conducted as specified in the EPA reference methods employed. Sampling and analytical methods are presented in the QAPP.

The handling of hazardous materials present at site will be in accordance with applicable Federal and state regulations (i.e., 40 CFR 761.61 and 79). Transportation of potential PCB waste on public roads will be conducted in accordance with applicable Federal and state hazardous waste transportation requirements (i.e., 40 CFR 761.205(a)(2)). Prior to engaging in PCB waste handling activities, all generators, commercial storers, transporters, and disposers shall notify EPA of their PCB waste activities by filing EPA Form 7710-53. Hazardous waste manifests, including any required by the State, will be completed, signed by Dico/Titan as the alleged generator, and accompany each load of PCB waste to its final disposal facility. Any weight or other restrictions on public roads to be used by PCB waste transporters will be verified prior to shipment of any materials off site. All off site waste shipments will comply with the manifesting requirements set forth in 40 CR 761.207 to 209 and 218 for disposal in accordance with 40 CFR 761.61 and 62.

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2.0 MOBILIZATION

GES will mobilize personnel, supplies and equipment necessary to complete this project from various locations. All personnel who are assigned to the project will have completed an OSHA 40-hour initial and annual 8-hour Refresher training in accordance with 29 CFR 1910.120 and will be participants in an approved medical monitoring program. GES will maintain copies of OSHA 40-Hour Hazardous Waste training and 8-Hour Refresher Course training certificates for all assigned team personnel at the Project Site and the corporate office.

2.1 Health and Safety Plan Review

Prior to mobilization, the Site Safety Officer (SSO) will review administrative safety documentation for each assigned individual. Individuals will also provide personal emergency information to the SSO, including emergency contact numbers and current physician. The SSO will maintain copies of all relevant training certificates, current physicals, and other health and safety data for all assigned team personnel at the site.

The Project Manager (PM) and SSO will conduct an initial safety meeting when the team begins the response activities and at the beginning of each work shift thereafter. These meetings will review the WP and each component of the shift's planned work activities. The application of the HASP to each work element will be explained. Questions will be encouraged during these sessions. All team members will document (by signature) that they have reviewed the HASP. On the first shift of the day, review of the HASP will be immediately followed by a reconnaissance of the site. All team members will attend and the RPM will be invited. The HASP is included as **Attachment 2** of this Work Plan.

During safety meetings the following primary health & safety concerns will be addressed:

- Health and well-being of the work crew,
- Heavy Equipment Operations Safety,
- Potential personal injury from slips, trips, falls, strains, and sprains,
- Potential personal injury by being hit or injured by moving equipment or debris,
- Exposure to hazardous chemicals during waste consolidation and transfer,
- Fatigue and heat/cold stress.

The key site precautions addressed will be as follows:

- Ensure proper decontamination when exiting exclusion zones
- Use buddy system at all times
- Use spotter when operating equipment in confined areas or backing
- Visually inspect all temporary waste storage areas on a daily basis
- Avoid any areas cordoned off with caution tape or safety fence unless a specific task is to be completed in that area
- PPE assignments by task

D0573

Each shift's planned work schedule will also be reviewed during the daily safety meeting to point out any precautions associated with the specific tasks.

3.0 SITE PREPARATION

Temporary facilities to support response actions will be set up at the site immediately following mobilization. Site preparation will include:

- Setup of the Removal Team mobile command post and support services;
- Coordinating with local utilities to fully disconnect all utility services that may have an impact to Removal objectives;
- Identify proper emergency evacuation procedures;
- Establish and delineate work zones;
- Establish segregation and decontamination areas; and
- Establish site security.

3.1 Establish Work Zones

GES will establish work zone control at the site as described in detail in the HASP, **Attachment 2**. The zones will be delineated and marked with the appropriate materials (signs, posts, or colored or labeled tape) under the supervision of the SSO or PM.

The Support Zone will be located in a centralized area generally upwind and determined to be free of any source contamination. This will also be designated as the entrance to the site. All support personnel, equipment, and supplies will be maintained in the Support Zone.

The Contamination Reduction Zone (CRZ) is located between the Exclusion Zone (EZ) and the Support Zone, and consists of the decontamination facilities placed and maintained by GES. All personnel, tools, and small equipment will enter and exit the EZ through the CRZ. Within the CRZ, the decontamination station will be the main EZ entrance and exit point.

Several individual EZs may be developed around prominent areas of contamination, based on need. Modified CRZs will accompany each EZ, with major decontamination facilities at EZs where heavy equipment is utilized. Personnel will enter and exit EZs only through the associated CRZ, except in case of emergencies. Only personnel who meet training and medical monitoring requirements may enter an EZ. All personnel will be required to wear the assigned personal protective equipment (PPE) in the EZ. PPE requirements are defined in the HASP.

3.2 Establish Decontamination Areas

Personnel decontamination facilities and an equipment decontamination pad will be established, as necessary. The HASP contains detailed procedures for decontamination of equipment and personnel to ensure that any materials encountered in the EZ are removed in the CRZ. The personnel decontamination facility is also described in detail in the HASP. Fire extinguishers, an emergency eye wash station, and a first-aid kit will be located in this area.

3.3 Establish Site Security

Security at the Site was established when SIM, at the EPA's request, installed temporary fence to restrict access to the metal beam stockpile areas. GES will inspect and monitor the installed fence to prevent access of unauthorized personnel to all areas of on-going remediation. Any situation involving public safety will be reported immediately to Dico/Titan, EPA and the appropriate local authorities.

4.0 SITE REMOVAL ACTIVITIES

The current proposed action at the Site requires removal of any visible insulation and adhesive residues and decontamination of the portions of the metal beams that EPA allegedly tested for PCBs at concentrations exceeding $10 \text{ ug}/100\text{cm}^2$ (the high occupancy standard stated above) as specified in 40 CFR 761.79(b)(3)(i)(B), which is decontamination by scarification for "non-porous surfaces in contact with non-liquid PCBs." In addition, the soil beneath the current metal beam stockpiles will be sampled to verify compliance with the PCB cleanup standard for bulk remediation waste in high occupancy areas as specified in 40 CFR 761.61(a)(4)(i)(B). GES will perform the following tasks immediately after the initial site safety meeting, concurrently with site set up (**Section 3.0**).

4.1 Segregation and Decontamination

The RPM, PM, and SSO will perform a thorough site review to determine the full size and scope of the response and specific hazards that need to be addressed prior to full-scale removal activities. Hazards will be marked on-site with caution tape and flags and also marked on the site layout plan. Worker safety is of the utmost importance; therefore no GES Response Team members will be allowed access to any areas until the situation has been fully assessed and staging areas for metal beam segregation and decontamination operations identified.

Once the segregation and decontamination staging areas have been identified, GES will construct containment by placing properly bermed 6-mil poly sheeting on the ground in the identified staging areas. Tent structures or additional poly sheeting will be erected around the containment areas to enclose the segregation and decontamination areas for site operations. Utilizing construction forklifts, GES personnel will transport metal beams from the stockpiles to the segregation area for visual inspection. At the segregation area each metal beam will be numbered consecutively to create an identification system for Site tracking and documentation purposes. If visual inspection reveals no indication of residual insulation or adhesive, the metal beams will be sampled as identified in the QAPP (Attachment 1) to verify PCB concentrations do not exceed $10 \text{ ug}/100\text{cm}^2$. If a metal beam contains visible residual insulation or adhesive, the beam will be relocated to the decontamination staging area for removal of the visible insulation and adhesive residues and decontamination of the portions of the metal beam that contained the visible insulation and adhesive.

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4.2 Metal Decontamination Activities

Metal beams containing visible residual insulation and adhesive will be relocated from the segregation area to the decontamination staging area. All visible insulation and adhesive residues will be physically removed by hand or power wire brushes, impact tools, grinders, sanders or by a combination of these methods. Those portions of the metal beams will then be decontaminated by abrasives applied through nozzles or centrifugal wheel grinding to remove PCB residues in accordance with the National Association of Corrosion Engineers (NACE) Visual Standard No. 2, Near-White Blast Cleaned Surface Finish. Compliance with this process will be verified by visually inspecting all cleaned areas {40 CFR 761.79(b)(3)(i)(B)}. As stated previously, tent structures or additional poly sheeting will be erected to fully enclose the decontamination areas, which will mitigate the spread of potentially contaminated dust and particulate matter as a result of mechanical grinding or abrasives. Where feasible, additional engineering controls will be implemented for vacuum recovery and immediate containerization of dust and particulate matter resulting from decontamination activities. All waste generated during decontamination activities will be containerized for offsite disposal at their original concentration. {40 CFR 761.79 (g)(2)}.

4.3 Site Soils

Once the soils beneath the existing metal beam stockpile areas have been exposed, GES will conduct site soil sampling activities in as identified in the site QAPP (Attachment 1). Soils exceeding the 1 mg/kg PCB cleanup standard will be excavated in 1" lifts and transported offsite for proper disposal in accordance with 40 CFR 761.61. This process will be repeated until sample analysis verifies the remaining site soils do not exceed the 1 mg/kg PCB concentration. Any excavated areas will be backfilled with clean imported fill material, graded to match existing site elevation and restore natural drainage patterns. Finally, all disturbed areas will receive seed and straw to promote grass growth and minimize erosion.

5.0 SITE SAMPLING

Advance notification of all site sampling activities will be provided so the EPA or the EPA authorized representative may be present. GES anticipates that site sampling will consist of the following elements described in this section.

5.1 Metal Surface Sampling

Utilizing construction forklifts, GES personnel will transport metal beams from the stockpiles to the sampling area for visual inspection. As indicated in the QAPP (Attachment 1), each metal beam will receive a unique identification number at the sampling area for individual tracking purposes.

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If visual inspection reveals no indication of residual insulation or adhesive, the metal beams will be sampled as identified in the QAPP (Attachment 1) to verify PCB concentrations do not exceed 10 ug/100cm².

5.1.1 Metal Sample Identification

Metal beams relocated to the sampling area will each receive a consecutive numeric number followed by an alphabetic number to indicate the top (T), bottom (B), right (R) and left (L) sides of each beam. Since the width and height of the beams is approximately 10 cm, the total length of each beam will be equally divided into 10 cm sections to create individual 100 cm² sample areas. For example, a 10' long beam would be approximately 304 cm long, which would create approximately thirty (30) sample grids along each side of the metal beam. Therefore a PCB wipe sample taken from beam number 1 on the top side, 5' from the labeled end would have the distinct sample identification: **1T15**.

5.2 Soil Sampling

Once exposed, the soils beneath the existing metal beam stockpile areas will be sampled to verify PCBs do not exceed the 1 mg/kg cleanup standard for the Site. Each former metal beam stockpile area will be divided into equal-sized grids, not to exceed 10 by 10 feet. A surface soil sample will be taken at each grid point and combined into composite samples as identified in the QAPP (Attachment 1). Any grid areas where soils exceed the 1 mg/kg PCB cleanup standard will be excavated in 1" lifts and the confirmation sampling repeated until analysis verifies the remaining site soils do not exceed the 1 mg/kg PCB concentration.

5.2.1 Soil Sample Identification

Each former metal beam stockpile area will be identified by a capitalized alphabetic letter with the x and y axis of the sample grids identified by consecutive numeric numbers and consecutive lower case alphabetic letters, respectively. Therefore, a sample collected from the first former metal stockpile area on the grid point of the 3rd column and 3rd row would have the distinct sample identification: **A3c**

Grid point surface samples consolidated into composite samples for laboratory submission and subsequent confirmation analysis will be carefully documented in the site sampling log for tracking and clearance purposes. Composite samples submitted to the lab will be distinguished by the assigned capital letter for the metal beam stockpile area and consecutive numeric numbers. Therefore, the first composite sample submitted from the first former metal beam stockpile area would have the distinct composite sample identification: **A1**

D0577

6.0 LABORATORY ANALYSIS

All waste generated during decontamination activities will be containerized for offsite disposal at their original concentration. {40 CFR 761.79 (g)(2)}. GES will segregate and consolidate any waste samples for submission to an independent EPA-approved laboratory for waste disposal profiling as well as any testing related to PCB cleanup standards. A laboratory accredited under the National Environmental Laboratory Accreditation Program (NELAP) and approved by the EPA will perform analyses required for waste disposal profile approvals. These will include quantitative analyses of waste products, decontamination waste and any other waste generated from removal activities. GES will obtain RPM approval of all parameters to be measured by the off-site laboratory.

- Analytical test parameters will be approved by RPM.
- Testing parameters will be based on aqueous chemical treatment, incineration disposal methods or treatment and landfilling.
- Composite samples will be compiled the same day they are sent to laboratory.
- Data intended for use in characterizing wastes for disposal will meet the QA 1 requirements as specified in "QA/QC Guidance for Removal Activities" (OSWER Directive 9360.4-01)(April 990).
- Composite samples will be submitted for analytical testing required for soil disposal (SW846 - Method 8082A; Aroclors only).

7.0 TRANSPORTATION, AND DISPOSAL

GES will manage and coordinate transportation and disposal (T&D) services for all wastes generated during removal activities at the Site. All waste generated during decontamination activities will be containerized for offsite disposal at their original concentration. {40 CFR 761.79 (g)(2)}. The wastes will be sampled, profiled, categorized, and disposed of in accordance with all applicable regulations and with the approval of the RPM.

7.1 Solids

Uncontaminated waste materials include, but are not limited to, site trash, materials brought on-site, common solid waste and rubbish that have not been contaminated by site activities, and aboveground vegetation. Site trash will be collected on a regular basis and placed into a 4-yard trash dumpster located in the Support Zone. The dumpster will be properly labeled to prevent the introduction of hazardous or other non-hazardous wastes, and will be emptied weekly. Other materials brought on-site and solid waste will be collected on a regular basis, stored in a roll-off, and disposed by GES at a local municipal landfill at the end of the project. The vegetative waste will consist of weeds, brush, and small trees. This material will be cut and placed on-site at an appropriate location or transported to a local municipal landfill as directed by the RPM.

D0578

7.2 Bulk Solid Disposal – Hazardous

Bulk solids are expected to include contaminated soil, insulation and adhesives, solids recovered in decontamination, as well as the PPE utilized during the removal operations. Assuming these materials are classified as PCB waste, the disposal options would include Subtitle D or TSCA designated facility approved by the EPA or incineration at a TSCA incinerator. The disposal facility determination would be made following the receipt of laboratory analytical, completion of waste disposal profiles and waste acceptance approval by the disposal facility. All waste generated during decontamination activities will be containerized for offsite disposal at their original concentration in accordance with 40 CFR 761.79 (g)(2). The following chart reflects potential disposal facilities for the anticipated waste generated during site activities:

Description	Proposed Disposal Facilities
Residual Insulation, & Adhesives	<p><u>TSCA approved SUBTITLE C landfills</u></p> <ol style="list-style-type: none"> 1. EQ - Wayne Disposal, 49350 North I-94 Service Drive, Belleville, MI 48197, EPA ID# MID 048 090 633 Phone # 313-480-8080 2. US Ecology, Hwy 9511 Miles South of Beatty, Beatty, NV 89003 EPA ID # NVT330010000, Phone # 800-239-3943 3. US Ecology, 10.5 miles NW on HWY 78, Lemley Road, Grandview, ID, EPA ID# IDD073114654 Phone # 800-274-1516 4. Waste Management, Highway 17 North, Mile Marker 163, Emelle, AL 35459, EPA ID #ALD000622464 Phone # (205) 652-8156 <p><u>Sub Title D landfill (< 50 ppm PCB)</u></p> <p>Metro Park East Sanitary Landfill, 12181 NE University Avenue in Mitchellville, IA 50169 Phone # 515-967-2076</p> <p><u>TSCA Incinerator</u></p> <p>Clean Harbors, Aragonite, POBOX 22890, Salt Lake City, UT 84122-0890, EPA ID # UTD981552177 Phone # 801-323-8100</p>
PCB Impacted Soils	
Decontamination wastes	

8.0 DECONTAMINATION

All equipment, materials, and personnel will be evaluated for contamination upon leaving the exclusion zone. Equipment and materials will be decontaminated and/or disposed and personnel will be decontaminated as necessary. Decontamination will be performed in the contamination reduction corridor or any designated area such that the potential exposure of uncontaminated employees, equipment, and materials will be minimized. Decontamination of personnel and equipment will be performed in accordance with all requirements of the HASP, **Attachment 2**.

D0579

9.0 SITE RESTORATION AND DEMOBILIZATION

Upon completion of the site response and removal activities, GES will demobilize from the site as soon as the RPM determines that the site has been stabilized and poses no further immediate threat to the public or the environment. The following demobilization activities will be accomplished at the completion of fieldwork.

- All personnel, equipment, and materials will be removed from the site after decontamination is completed.
- All temporary facilities and utilities will be removed.
- GES will perform final site maintenance to remove litter and correct surface features which may present physical hazards (e.g., holes, sharp objects, etc.).
- Any excavated areas will be backfilled with clean imported fill material, graded to match existing site elevation and restore natural drainage patterns.
- All disturbed areas will receive seed and straw to promote grass growth and minimize erosion.
- Perform any reasonable measures to restore property to similar condition as it was prior to response activity.

Once all personnel and equipment have been demobilized from the site, post-remedial activities will begin. The PM, Dico/Titan and RPM will communicate to complete and submit any and all remaining reports to the EPA for final approval. This data will be summarized and stored for a minimum of 10 years.

An Off-Site Disposal Report will be completed for each waste stream shipped from the site. The report will include copies of each manifest and relevant forms as well as Certificates of Disposal for each waste item shipped from the site.

Upon completion of all on- and off-site activities, a final report will be prepared that chronologically documents activity performed by GES at the site, and summarizes and totals all project costs incurred.

10.0 PROJECT MANAGEMENT

This section describes our proven project management approach to meet the EPA requirements for technical performance, schedule performance, cost control and quality assurance. We also describe the resources and management methods we will use to assure effectiveness and efficiency.

10.1 Project Organization

The GES project organization for this task order is presented in **Figure 10-1**. The following paragraphs briefly describe the responsibilities of key project team members. An individual

carefully selected based on education, experience, and expertise in the designated area of responsibility will fill each position.

10.1.1 Project Team and Responsibilities

GES Project Coordinator: The Project Coordinator (PC) is the single point-of-contact for receipt of project orders and communicates directly with Dico/Titan and the EPA. The GES PC will be Mr. Jeff Brown and he will have the overall responsibility for implementation of the project and for the staff identified in **Figure 10-1**. He will provide the project team with necessary support from the GES Buford, Georgia Response Center and other GES Team resources.

Project Manager: The Project Manager (PM) has responsibility for project technical execution, management, cost control, and scheduling. The PM will be selected based on his level of expertise and experience required for this response. The PM will coordinate, direct, and integrate all elements of the project team and serve as the RPM's on-site contact. He will respond directly to the RPM's requirements and communicate directly with the RPM concerning day-to-day project operations.

Site Safety Officer (SSO): The SSO has responsibility and authority to implement and enforce the site-specific Health and Safety Plan (HASP). The SSO will determine personal protection levels based on field conditions; conduct requisite air monitoring; evaluate environmental, physical, and chemical health hazards; conduct daily safety meetings; report any health and safety violations; and assist in the coordination of any emergency response activities. The SSO will also have the authority to suspend work during any on-site emergencies, or if work is not in compliance with the HASP. The SSO will report directly to the Program H&S Manager and indirectly to the PM.

Chemist: The GES Chemist will be on site to direct sampling activities, perform HAZCAT characterization activities, perform consolidation and packaging of waste and provide general technical support. The Chemist will also fill the role of QA/QC Supervisor under the direction of the Program QA Manager. In this role, he will manage on-site implementation of the approved QA Project Plan, including oversight of subcontractor activities to ensure compliance with all EPA and GES requirements.

Field Clerk: The Field Clerk is responsible for collecting and tracking all daily costs and supporting site operations. The Field Clerk duties include reporting daily costs for Dico/Titan approval; reconciling all cost documents prior to invoicing; and providing accurate daily, weekly, and monthly reports on costs to date. Additional duties include maintaining vendor accounts and the logistical integrity of the project through the field procurement of services and materials in accordance with GES procurement procedures. The Field Clerk will also support the PM through ongoing maintenance of accurate cost control information and budget estimates.

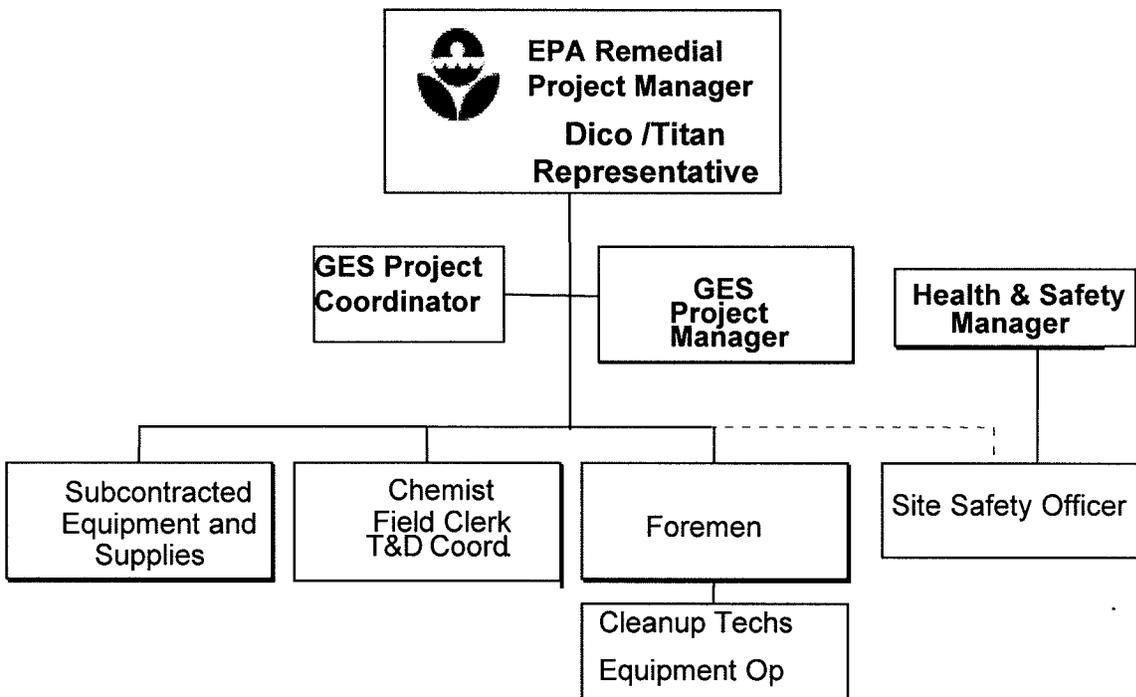
T&D Coordinator: The T&D Coordinator will support the PM by managing T&D activities ensuring they are performed in a compliant manner. The T&D Coordinator will review analytical data and waste characterizations; work with the PM and RPM to develop disposal options; identify qualified and approved facilities and transporters, obtain bids, prepare

documents such as manifests, waste profile sheets, and bills of lading in preparation for Dico/Titan's signature; and provide records of all disposal activities to the EPA as necessary.

Foremen: Foremen are directly responsible for implementation and supervision of field activities. They are also responsible for understanding and complying with the requirements set forth in the HASP and notifying the SSO and PM of any health and safety concerns in their work areas.

Other Team Personnel: All other personnel shown in **Figure 10-1** are responsible for performing field activities assigned to them; understanding and complying with the HASP and QAPP; and conducting themselves in a safe manner, mindful of the inherent hazards associated with work on this site.

Figure 10-1 GES Project Organization



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10.1.2 Project Communications

GES recognizes the importance of excellent communication to ensure that the EPA receives services in an efficient, responsive, and safe manner. Our standards for clear and timely communications, both formal and informal, are an integral part of our operations and contribute significantly to the quality and responsiveness of our services. Open communications between all project team members (Dico/Titan, EPA, GES, and selected subcontractors) are absolutely essential.

Operational efficiency, responsiveness, health and safety, and community relations are all integral elements in achieving good site communications. Elements of the on-site communications network will include a meeting between the RPM and PM each day to discuss progress, implementation and future tasks. At this meeting the PM will present the RPM with the report of planned activities for review and approval.

The PM and RPM will also interact as needed during each day of the project. Every 14 days a written report will be prepared and submitted to the RPM detailing the project progress. In addition, the RPM has complete access to the GES PM as needed. The GES PM will contact the OSC on a regular basis to ensure that the site is being managed according to the RPM's requirements.

Direct communication will occur between all field personnel and the SSO regarding health and safety issues. Health and safety meetings at the start of each day will outline scheduled tasks and hazards associated with those tasks. These meetings will periodically include procedural reviews of such topics such as hand signals, emergency procedures, and other safety protocols. Attendance is mandatory for GES and subcontractor personnel. GES also encourages RPM attendance at these meetings.

10.2 Schedule

GES developed a project time line to arrive at the most efficient use of personnel, equipment, and materials (**Figure 10-2**). Actual progress relative to the schedule is compared weekly to review planned versus actual progress. Analysis of planned versus actual progress aids in estimating cost-to-complete figures. An updated schedule will be submitted to the RPM on a weekly basis.

Figure 10-2 Project Time Line by Task

Description	WEEK	1	2	3	4	5	6	7	8	9	10	11	12
Submittal & Review		■	■	■									
Mobilization					■								
Site Preparation					■								
Site Removal Activities						■	■	■	■	■	■	■	■
Site Sampling												■	■
Laboratory Analysis												■	■
Waste Removal, T & D												■	■
Decontamination													■

