
WORK PLAN

ROCK TENN PAPER MILL SITE OTSEGO, MICHIGAN

Prepared for:



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FIGURES

Figure 1. Site Location Map

Figure 2. Site Layout

APPENDICES

Appendix A Initial Construction Schedule

Appendix B Rock Tenn Site Resource Plan

1. INTRODUCTION

Environmental Quality Management, Inc. (EQM) has been tasked with performing a time-critical removal action (TCRA) at the Rock Tenn Papermill Site (Rock Tenn) in Otsego, Michigan under Emergency Response and Rapid Services (ERRS) Contract No. EP-S4-16-03, Task Order No. 68HE0519F0017 with the United States Environmental Protection Agency (EPA) Region 5. This TCRA will address the removal of asbestos-containing building materials (ACBM) and suspect ACBM (SACBM), powerhouse building demolition, transportation and off-site disposal of ACBM/SACBM at the Rock Tenn Site located at 431 Helen Avenue (see Figure 1, Site Location Map). The complete scope of work for the TCRA is outlined in an Action Memorandum dated February 14, 2019 (EPA Region 5).

The Rock Tenn Site covers approximately 17 acres and includes more than 40 buildings. The site is surrounded with a perimeter fence and is overgrown with vegetation since operations ceased at the facility. The TCRA will address the Power House Building located on the east-central portion of the property (Figure 2). The building has a main 1st level and a basement. The building is in a state of structural decay as evidenced by spalling of the 1st floor concrete slab, severely rusted exposed steel support beams, and cracks in the perimeter wall structure. Both the 1st floor and basement floor are covered with debris. Previous sampling and analyses determined the presence of asbestos-contaminated material (ACM) in the debris located on both floor levels. In addition to the ACM-contaminated floor debris, other structures within the building contain or may contain ACM such as piping wrap, the boiler unit, and several other vessels. Electrical and water service to the building has been disconnected and the building has been boarded up to restrict entry. However, several entrances have been breached for various reasons, and the building's interior is accessible.

2. SITE MANAGEMENT AND COMMUNICATIONS

The EQM Program Manager (PM), Response Manager (RM), and Field Cost Administrator (FCA) will be the primary management points of contact for the EPA. The PM will ensure the RM has the proper resources needed to complete the task order and ensure technical support from the program management office. The RM will be the primary point of contact for the EPA On-Scene Coordinator (OSC) and will direct the field crew in safe day-to-day field operations as well as coordinate with vendors and subcontractors on the timely delivery of goods and services. The FCA will be responsible for task order cost tracking; maintaining project files; and procuring equipment, materials, and subcontracted services.

Site operations will typically be conducted Monday through Friday from 7:00 am to 5:30 pm. This is a 10-hour workday that results in 40 hours per week of straight time and 10 hours per week of overtime.

The EQM RM will manage site activities and provide ongoing communication with field team members, subcontractors, vendors, the START representative, and the EPA OSC on an as-needed basis. The five most common management tools used on a daily or weekly basis will be:

- **Work Order**—The EQM RM will prepare work orders on a daily basis to document planned work activities for the following day and work accomplished on the current day. SCA/DBA work hours, labor, and equipment resources required for each day will be documented. Completion of unscheduled work or the addition of resources will be tracked on the amendment section of the work order form.
- **Safety**—The EQM RM will conduct an initial safety orientation meeting to review the Site Safety Plan and work practices prior to the start of work activities. A daily Tailgate Safety Meeting will be held with the crew to review daily work assignments and safety hazards associated with work activities. The RM will prepare the daily safety briefing agenda, and crew members will sign an acknowledgement form that they attended the meeting and understood the daily safety meeting topics.
- **Cost Tracking**—The EQM FCA will prepare a 1900-55 daily cost report using RCMS cost tracking software. Costs will be compiled from employee work hours, equipment and materials utilized, and subcontractor services performed for each day. The FCA will typically complete the cost report by 10:00 am the following morning for the previous day's work activities and will forward the report to the EPA OSC for his/her review and concurrence. The cost report will be supported by attaching documentation to validate daily

costs such as sign-in/sign-out logs, work orders, vendor and subcontractor invoices, disposal weight tickets and shipping documents, and vendor packing lists.

- **Construction Schedule**—EQM has prepared an initial construction schedule to demonstrate the sequence of work activity completion and the associated time frame and duration of when activities will be performed. Work activities will be reviewed on a weekly basis and the schedule will be updated to track work completed and changes to the work schedule. A copy of the initial construction schedule is in Appendix A.
- **Tracking Logs**—The EQM RM and FCA will prepare the following tracking logs to document site activities. These logs will be kept for work items that relate to project cost or safety.
 - **Disposal Tracking Log**—This log will track truck numbers, manifest/bill of lading numbers, driver arrival/departure times, and volume and/or tonnage.
 - **Site Sign-in/Sign-out Log**—This is a multi-purpose log used to record site billable hours and is a safety form to inventory who is present on site to account for all site workers and subcontractors in case of an emergency.
 - **Green Metrics Log(s)**—These logs are used to track green metrics such as use of alternative fuels, recycled materials, and water usage.

3. SCOPE OF WORK AND TECHNICAL APPROACH

EQM's scope of work and technical approach are crafted to meet regulatory and contract requirements as well as site removal goals and objectives. The scope of work and technical approach presented are for known work determined during the March 22, 2019 site visit. EQM will perform the following tasks:

- Implement sediment- and erosion-control measures to meet the requirements of the Federal Clean Water Act.
- Initially mobilize one Response Manager, one foreman, two equipment operators, and three laborers. EQM's field cost administrator will initially work remotely from the site and may be mobilized as needed throughout the project if the scope of work expands.
- Provide, install, and remove (at project completion) site facilities, utilities, and temporary infrastructure improvements.

3.1 Premobilization Activities

EQM will prepare to mobilize to the Rock Tenn site on April 1, 2019. EQM will complete many activities remotely in preparation for site operations. The following subsections describe premobilization activities.

3.1.1 Plans

In addition to this Site Work Plan, EQM will prepare a Site Safety Plan that will provide:

- Site background information
- General safety procedures and requirements
- Training requirements
- Medical and heat and cold stress monitoring requirements
- Personnel decontamination procedures and requirements
- Levels of protection
- Contaminants of concern information
- Emergency contact information and procedures
- Accident and incident reporting forms
- Activity Hazard Analysis
- Material Safety Data Sheets.

3.1.2 Resource Procurement

The EQM PM, RM, FCA, and program office staff will work to collectively procure the site resources required to sustain site operations and complete the TCRA goals. The EQM PM and RM will identify the labor equipment and material resources required for the task order, and the EQM PM or designate will acquire the necessary resources. EQM will utilize in-house and team subcontractor labor and equipment resources for ACM floor debris removal and subcontract a demolition contractor to demolish the building and load out ACBM debris. Additional equipment resources will be procured from local and regional vendors. EQM will procure site materials as well as subcontractors and other resources from regional and local vendors. These resources include:

- Building demolition subcontractor
- Electrician subcontractor for installation
- Site sanitation facilities
- Sediment- and erosion-control supplies
- Expendable personal protective equipment.

EQM will competitively bid procurements based on best value by using evaluation criteria such as low cost, timely schedule, and experience.

3.2 Mobilization

3.2.1 EQM Labor Mobilization

EQM plans to provide the RM, Foreman, FCA, two equipment operators, and three laborers. These personnel will be mobilized from their respective home offices. Travel time for these employees will be charged up to the equivalent amount of time to mobilize from our Cincinnati office if mobilization travel time exceeds the mobilization travel time from Cincinnati. These employees will require per diem and lodging while working on site. EQM will transport the RM, Foreman, and FCA in company-provided vehicles.

3.2.2 Equipment and Other Resource Mobilization

EQM will locally lease office trailers and a 100-kW generator.

3.3. Site Resource Summary

EQM has prepared the Rock Tenn Resource Plan presented in Appendix B to summarize the type, quantity, origin, and utilization for labor, equipment, and materials.

3.4 Site Preparation

EQM based the type and extent of site preparation requirements on our understanding of the scope of work for this TCRA. EQM expects work activities to be completed within 5 to 8 weeks from initial mobilization.

3.4.1 Facilities and Utilities

The following facilities and utilities will be provided:

- Office Trailers—EQM will mobilize and rent two 10-ft by 40-ft office trailers. One trailer will be for the EPA OSC and START offices, and one trailer will be for EQM offices and the crew break area.
- Electrical Service—EQM will provide electrical service from a rented 50-kW generator. EQM will procure a portable 100-kW generator from a local vendor to supply electrical power for the office trailer and other site needs. Electrical generator power will only be used during site working hours and will be shut down during non-working hours. An electrician subcontractor will be locally procured to make electrical connections.
- Water Service—EQM will arrange with the City of Otsego to utilize water from a local fire hydrant for dust control. The nearest hydrant is located at the perimeter of the papermill facility. A hydrant meter and backflow device will be obtained from the municipality to facilitate accessing fire hydrant water, and additional piping, valving, and fittings will be procured to distribute water service to the work areas. EQM may assemble a piping system or subcontract to a local plumbing contractor.
- Phone and Internet Service—Cellular phones will be used for phone service. EQM will provide Jetpacks for internet service.
- Site Sanitation and Other—EQM will provide two portable toilets and one hand-wash station with twice-weekly service. EQM will provide small-quantity dumpster service for site trash and will provide separate receptacles in the office and break areas to collect recyclable plastic and paper products. Collected products will be taken to the local recycling facility.

3.4.2 Site Controls

EQM will install the following site controls to maintain safety and protect the environment:

- **Work Zone Delineation**—Traffic barricades, barrier tape, and signage will be used to delineate the perimeter of the power plant area work zones and restrict unauthorized entry. Signs such as Keep Out and Authorized Entry Only will be affixed to the fencing to further delineate work areas.
- **Support Zone/Contamination Reduction Area**—EQM will provide a shade tent, tables, and chairs for this area, and store emergency response equipment such as a first-aid kit, eye-wash station, and personal protective equipment. Trash receptacles and plastic sheeting will be provided for dry decontamination of personnel exiting work zones. Disposable personal protective equipment (PPE) will primarily be used to protect site workers from exposure to site hazards. Disposable PPE will consist of Tyvek coveralls, poly-coated Tyvek coveralls (for wet decontamination work), nitrile gloves, and PVC booties.
- **No Idling Policy**—To minimize carbon emissions, EQM will implement, when practical, a no idling policy for site trucks and heavy equipment.
- **Spill Response and Control Kit**—EQM will provide and maintain two spill control and response kits for the site. The kits will consist of an open-top steel or plastic drum that contains several bags of oil dry, adsorbent boom, and pads for cleaning up machinery fluid spills and releases. One kit will be staged near the transition entrance to the work area where daily fueling of equipment will take place. This location has the highest potential for a release occurring. A second kit will be staged near the active work area and will follow the excavator as work progresses. This kit will be used to address minor equipment fluid releases resulting from a damaged hydraulic hose. This is the second most likely potential for release at a work site.
- **Cover for Windows/Doors**—EQM will provide poly or tarp sheeting to cover open windows and doors that can provide a conduit for dust and asbestos fibers to migrate from the building during work activities.

3.4.3 Clearing and Grubbing

To prepare the site for operations, EQM will provide a rubber-tire loader, a skid steer loader with a bush hog attachment, chain saws and wood chipper to clear and grub vegetation and debris from the work areas, traffic routes, and support areas. Debris piles that obstruct work activities will be moved outside work zones and left in place for subsequent operations to be performed by others. Vegetation obstructions will be removed with chain saws and then chipped with a wood chipper or brush hogged.

3.4.4 Illumination and Ventilation Improvements to 1st Floor and Basement Level of Powerhouse Building

The 1st floor and basement level of the Power House building has minimal natural lighting. Temporary supplementary lighting will be needed to enhance safety for site workers. It will be impractical to distribute temporary lighting throughout both floors. EQM will provide

light stands, a portable generator, ground fault circuit interrupters (GFCI), and electrical drop cords to illuminate active work areas and traffic routes for moving ACM debris out of the building. The generator(s) will typically be located outside the building to minimize exhaust accumulations within the building. Generator(s) will be relocated as needed. Drop cords will be fed into the building through openings in the perimeter wall as close as possible to active work areas and traffic routes. When practical, the drop cords will be affixed to structural elements above the floors of the building to minimize cord contact with water accumulations and prevent trip hazards. Drop cord connections will be wrapped with plastic and duct tape to further minimize electrical cord contact with water, and GFCIs will be used to minimize electrical shock hazards.

EQM will provide negative air machines with HEPA filters to circulate air flow in the building when motorized equipment with combustible engines are operated. EQM will provide carbon monoxide (CO) monitors with alarms and distribute them in the basement and areas on the 1st floor where air movement is minimal. CO is heavier than air and tends to migrate to the lowest elevation.

3.4.5 Mitigation of Building Structural Hazards

In addition to poor illumination and ventilation, site workers face multiple types of building structural hazards. These hazards can be classified as:

- Overhead—Various pipelines, conduits, and structural steel have been partially and/or completely dislodged from their installation location and may result in injury or equipment damage.
- Slip, Trip, and Fall—The floors are covered with debris and have depressions and elevation changes. The first phase of the TCRA will address the removal of the ACM debris; preparatory work will be needed to minimize hazards prior to ACM debris removal.
- Structurally Compromised Floor Surfaces and Stairs/Walkways—The concrete slab and floor grating on the 1st floor appear to be structurally compromised in some locations and could result in structural failure and floor collapse in some areas.

These hazards will be assessed, and controls will be implemented prior to conducting ACM debris removal operations. These controls may consist of the following:

- Removal of hanging overhead obstructions using hot and cold cutting techniques such as a metal cutting torch, abrasive wheel, and reciprocating saws. Fire extinguishers and fire watch personnel will be stationed in hot cutting areas in accordance with standard operation procedures presented in the Health and Safety Plan. Scrap metal will be removed from the

work areas and staged on the site in a designated area for future recycling by the property owner (Allegan County).

- Slip, trip, and fall hazards may be dealt with in numerous ways as appropriate for the individual hazard. When possible, removal of the hazard will be the primary method. Hazards will be flagged and/or marked with caution tape, fluorescent spray paint, and signage to draw attention to the hazard.
- Barriers, ramps, and/or decking will be installed to protect workers from contacting or entering areas of structural concern. Construction fencing, barrier tape, and signage will be used to cordon off access to the areas of greatest concern. HDPE and/or timber matting will be used to bridge over smaller areas as appropriate. If ACM debris is present in areas of high structural concern, it will be left in place to be addressed during building demolition and debris removal.

3.5 1st Floor and Basement Floor ACM Debris Removal

EQM's objective is to remove as much ACM debris as possible from the 1st floor and basement floor of the building to minimize the risk of ACM release into the environment during building demolition.

3.5.1 1st Floor ACM Debris Removal

EQM plans to begin removal actions with the 1st floor of the powerhouse building. Various debris materials contaminated with ACM are dispersed over the expanse of the floor. SACBM pipe wrap is also present on pipes and on the floor. EQM equipment operators and laborers may use a mini-skid steer loader, mini-excavator, concrete power buggies, pallet jack, and wheel barrows to remove the ACM debris from the floor and load it into roll-off containers for disposal at a CERCLA Off-Site Rule compliant Subtitle D landfill. ACM debris removal and handling techniques and equipment may vary slightly as work progresses so that conditions can be adjusted within the building to maximize safety and efficiency. Wetting will be performed prior to disturbing any material as standard practice. Whenever possible, ACM debris will be recovered with mini-heavy equipment and transferred to building openings where material will be placed into double-lined roll-off shipping containers. Manual labor may be used to recover ACM debris in areas where mini-heavy equipment cannot be used because of space limitations and/or floor load weight restrictions. ACM debris may be bagged into polybags or 1-cubic-yard

supersacks. Wheel barrows or pallets/pallet jacks may be used to transfer material to the mini-equipment or directly to the loadout location.

The 1st floor will be prepared for the removal effort by covering door and window openings to limit off site dust migration. Roll-off waste shipping containers will be staged in the parking area outside the building. EQM plans to have a rubber-tire loader on site to transfer ACM debris from the building's access points such as loading bays to roll-offs where off-site disposal trucks can access them to transport waste to the landfill. Access ramps may also be installed in several locations where skid steer loaders can directly transfer ACM debris into roll-off containers. Each roll-off will have two liners fitted inside to contain the ACM waste. Liners will be sealed, and labels affixed once the box is loaded prior to being shipped off site for disposal. Plastic sheeting will be placed on the ground on both sides of the boxes to contain spills during box loading. A water conveyance pipeline from one of the local fire hydrants with multiple outlets and hose connects will be used to supply water for dust suppression during ACM handling operations. Several 5-kW generators will be positioned in/or near the work area to provide electrical power for the submersible pumps dispersing water for dust control, electric power tools, and portable lighting.

Workers will complete debris removal work while wearing Level C personal protective clothing/equipment. Debris will be scraped up with the bucket of the tracked skid steer loader and/or hand shoveled. A water mist will be applied to the debris as removal operations are ongoing in order to suppress dust both inside the building and when debris is deposited into roll-off containers. Large debris objects and recyclable scrap metal will be sprayed with water and segregated from debris being sent off site for disposal as ACM-contaminated material. Larger debris objects will be piled in a designated section of the 1st floor. Scrap metal will be staged in a designated area on the paper mill property as mentioned in Section 3.4.4.

3.5.2 Basement Level ACM Removal

Once ACM removal is complete on the 1st floor, ACM debris in the basement level will be removed in a similar manner. Loadout access is believed to be much more restrictive and may require some slight changes in handling and transferring ACM debris into the roll-off containers. EQM believes the primary loadout point will be from a former stairwell located at

the eastern end of the building. A double passage door from the basement into the stairwell can be used to move material out of the building where a small excavator can reach the material and transfer it into a double-lined roll-off container. These double doors may also be the location where the mini-excavation equipment can be rigged and slung into the stairwell where it can enter the basement. Fuel will be added to the mini-equipment in the stairwell by transferring fuel from a pickup truck saddle tank and hose, or 5-gallon safety cans will be used once the equipment is in the basement level.

After the ACM debris is removed, EQM will demobilize most, if not all, field laborers, equipment operators, and equipment used to remove ACM from the 1st floor and basement floor. The RM and foremen will remain on site to oversee demolition activities. Equipment will be decontaminated on site using a high-pressure water washer.

3.6 Building Demolition and Remaining ACM Removal

3.6.1 Building Demolition

EQM will competitively procure a demolition subcontractor to demolish the building and address the remaining ACM. EQM will prepare a request for proposal and provide it to at least three demolition contractors. EQM will arrange for a pre-bid site visit with perspective subcontractors collectively or individually if necessary. EQM plans for the subcontractor to provide a proposal for managing/completing all aspects of the building demolition with the option of providing transportation and disposal of building waste.

3.6.2 Remaining ACM Debris Transport and Disposal

The remaining ACM demolition debris will be loaded and transported off site to an approved disposal facility. Some site layout features may be modified such as relocating the personnel decontamination and support zone and expanding the work zone boundary. Additional facilities may be erected on site at the discretion of the demolition subcontractor, such as installing a tire wash station and multiple sets of scaffolding to accommodate truck dump bed lining and sealing. EQM will permit the subcontractor to utilize scissor-type manlifts.

The ACM debris loading process is generally described below, although the process may be modified as the demolition subcontractor deems.

1. Empty trucks enter site from the east off Helen Avenue.
2. Trucks will proceed to the roadway between the office and engineering building and advance to first set of scaffolding where a plastic liner will be installed in the dump bed.
3. Laborers in Level D PPE will enter the dump bed of trucks from scaffolding to install a plastic liner. Liner will be extended over top of the side walls so that it may be closed after loading.
4. Trucks will then advance past the tire wash station and a second set of scaffolding to loadout area.
5. Trucks will be loaded by an excavator with thumb and/or crane; a clamshell bucket will place material carefully inside dump bed so as not to damage the liner. A water truck will spray water on the pile during the loading process. A skid steer loader will consolidate debris piles in conjunction with loadout.
6. Loaded trucks will proceed to the second scaffolding where laborers in Level C PPE will encapsulate the load by using spray glue to seal the liner over the material. The truck's tarp will then cover the encapsulated load.
7. Trucks will then advance to a tire wash station where sediment will be cleaned from the tires.
8. Trucks will exit hot zone and receive waste shipment manifest and proceed to landfill.
9. Trucks will exit site turning east on W. River Street and follow route to landfill.

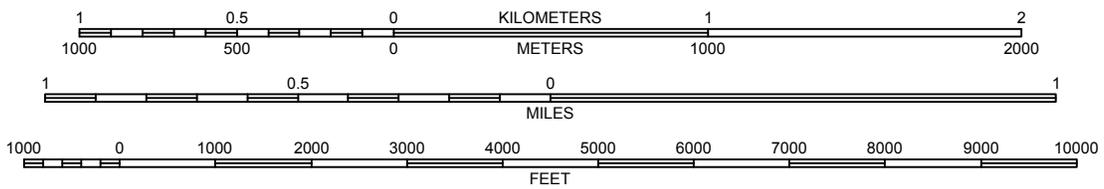
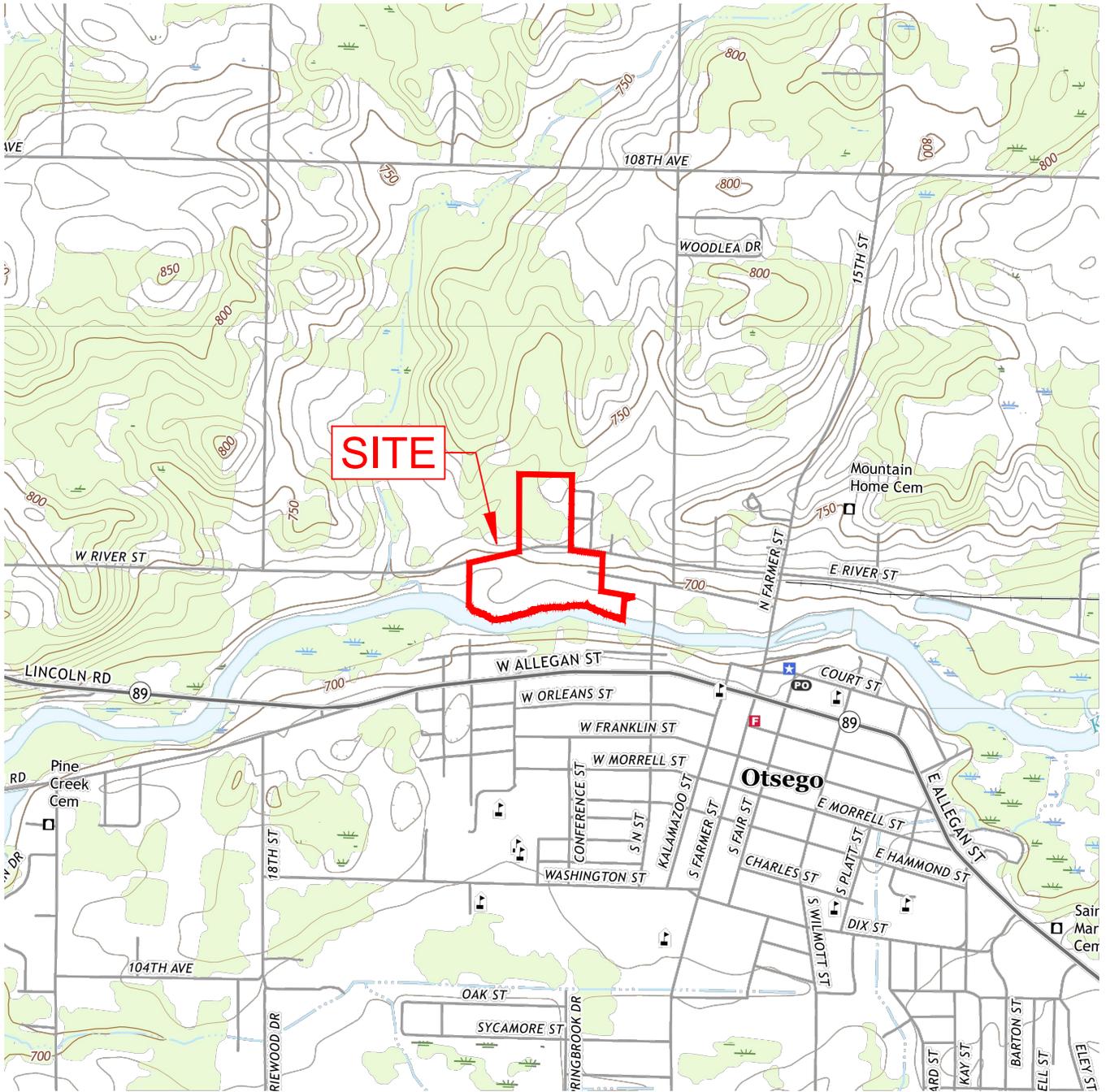
3.7 Site Restoration

The remaining buildings at the Rock Tenn site will be demolished and the site redeveloped. Site restoration will be limited to repairing damage from site operations and/or stabilizing erosion areas caused by EQM's site activities.

3.8 Final Demobilization

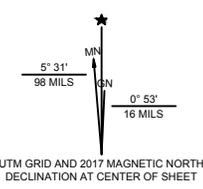
The remaining equipment and temporary infrastructure will be removed from the site upon completion of demolition, debris disposal, site restoration, and repairs. The RM and foremen will be demobilized following demobilization of site equipment, facilities, and infrastructure.

FIGURES



Base Map Source (South): USGS 7 1/2 Minute Topographic Quadrangle Map Otsego, MI, 2017	Reference: Rock Tenn Papermill 431 Helen Avenue Otsego, MI 49078
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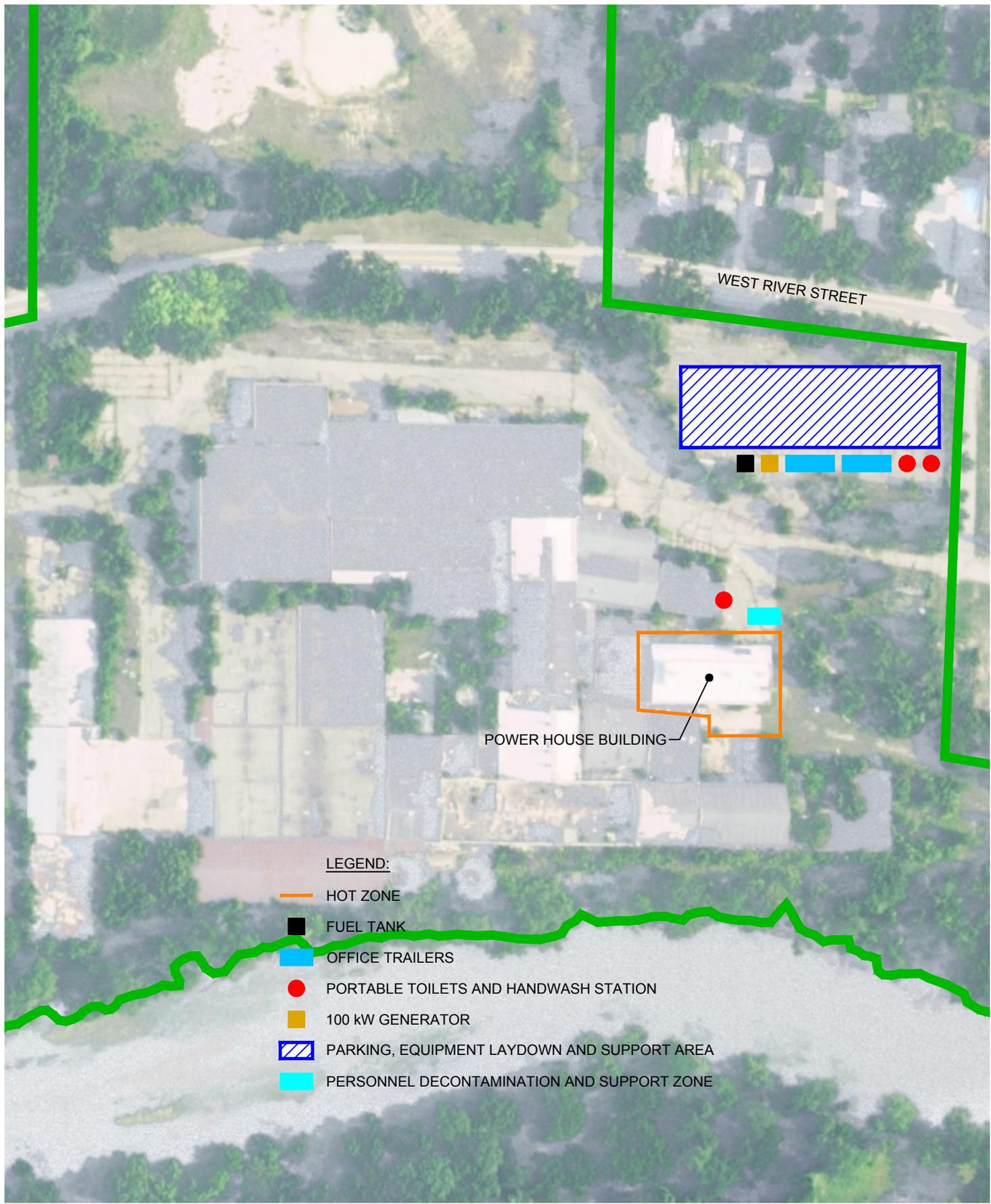
Allegan	Martin	Orangeville
Merson	Otsego	Kalamazoo NE
Gobles East	Kalamazoo SW	Kalamazoo



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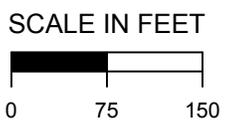
DRAWN	R. RUSSELL	03-18-2019
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APPROVED	E. BOWMAN	03-18-2019
SCALE: 1" = 2000'		

ROCK TENN PAPERMILL OTSEGO, MICHIGAN SITE LOCATION MAP			
SIZE	PROJECT NO.	DWG NO.	REV
A	030325.0069	FIGURE 1	0



LEGEND:

-  HOT ZONE
-  FUEL TANK
-  OFFICE TRAILERS
-  PORTABLE TOILETS AND HANDWASH STATION
-  100 kW GENERATOR
-  PARKING, EQUIPMENT LAYDOWN AND SUPPORT AREA
-  PERSONNEL DECONTAMINATION AND SUPPORT ZONE



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SCALE:	1" = 150'	

ROCK TENN PAPERMILL OTSEGO, MICHIGAN SITE LAYOUT MAP			
SIZE	PROJECT NO.	DWG NO.	REV
A	030325.0069	FIGURE 2	0

APPENDIX A
INITIAL CONSTRUCTION SCHEDULE

APPENDIX B
ROCK TENN SITE RESOURCE PLAN

Rock Tenn Resource Plan
EQM Project Number 30325.0069

Labor- Discription	Quantity	Source	Justification
Response Manager	1	EQM	Site Manager and Site Safety Officer
Field Cost Admin.	1	EQM	EPA Cost Tracking w/RCMS, Resource procurement
Foreman	1	EQM	Site Operations in the field.
Heavy Equipment Operator	2	EQM	Operate Site Equipment.
Laborer	3	EQM	Various Support functions.
Equipment	Quantity	Source	Justification
Office Trailer 10' by 40'	2	PacVan	1 trailer EPA & START; 1 Trailer EQM Management and Crew Break Trailer
100 kW Generator	1	MacAllister CAT	Power supply to office trailers if Hard line power can not be supplied
Excavator 8<10k with thumb	1	MacAllister CAT	Use to scrape floors on the first floor of the power house.
Skidsteer-Mini-6K	1	MacAllister CAT	Use to scrape floors on the first floor of the power house.
Cat 279 Skidsteer	1	MacAllister CAT	Clearing and grubbing operations.
Bush hog attachment for skid steer	1	MacAllister CAT	Clearing and grubbing.
Wheel Loader w/Forks	1	MacAllister CAT	Load and switchout roll-off boxes as needed.
Light Plant	1	MacAllister CAT	Lighting for inside the building.
Pick Up Trucks	4	EQM	Crew Transportation, Site Work
Materials	Quantity	Source	Justification
Rolloff- Liners	50	EQM	Line roll off boxes for ACM.
Heavy Equipment Fuel		EQM Procurement	Fuel for Heavy Equipment and 100 kW Generator
Pickup and Small Equipment Fuel		Gas Station	Fuel for Pickup Trucks and Small Equipment Equipment
PPE (suits,booties etc...		EQM Procurement	PPE
Sampling Supplies		EQM Procurement	Personnel /Perimeter sampling supplies
Subcontractors	Quantity	Source	Justification
Electrician	1	Local Provider	Hook up office trailer to either hard line power or generator
T&D Disposal	1	Local Provider	Asbestos Disposal
Backfill	1	Local Provider	Backfill culvert area, Build ramps into the building.
Labortory	1	Local Provider	Personnel/Perimeter analysis.
Portojon Services	3	Plummers	Toilets and Handwash station.
Demolition Contractor	1	EQM Procurement	Abate Asbestos and Demo the Powerhouse Building.