

## CHAPTER 5

### COST DOCUMENTATION

Successful cost projection, cost control, and cost recovery depend on accurate documentation of important daily site information. The cost management system in this manual focuses on required information necessary to fulfill cost management goals. It does not establish required forms that must be used to document this information. This chapter outlines the six types of cost information that must be documented at every Superfund removal site. It also provides alternative documentation techniques.

The OSC must ensure that the cost management and related information, detailed in Section 5.1, is documented every day when appropriate. The method used to document the information must be consistent from day to day at any one site. The method of documentation, however, may vary from site to site or Region to Region. Each OSC is responsible for ensuring that the required information is documented, and that a Documentation Index is prepared, thus indicating where to retrieve each type of information (see Section 5.3).

#### 5.1 INFORMATION TO BE DOCUMENTED

As mentioned above, the on-scene removal cost management system requires specific removal site information for effective cost management. The on-scene removal cost management system also records and preserves the information for easy retrieval. The following required information is necessary for proper cost documentation:

- o chronology of events and decisions;
- o entry and exit of personnel and equipment;



- o contractor work planned/authorized and contractor work accomplished;
- o contractor costs;
- o site conditions, such as weather; and
- o cumulative intramural and extramural project costs.

On-site information can be documented by the OSC and/or by other personnel who perform the specific job functions of cost manager, and safety and security officer(s). The on-scene cost manager documents the chronology of events and decisions, contractor work planned/authorized and accomplished, contractor costs, cumulative project costs, and prepares the Documentation Index (see Section 5.3 for the Index). The on-scene safety and security officer(s) document site conditions, and entry and exit of personnel and equipment. Each type of on-site information is discussed in the following sections. A matrix outlining the cost documentation system is presented in Exhibit 5-1.

#### **5.1.1 Chronology of Events and Decisions**

A chronology must be kept of dates and times of all key activities and decisions made on site. This record includes the types of actions taken and why they were taken; problems encountered on-site and how they were resolved; activities carried out by on-site personnel; all meetings with EPA managers, the contractor, elected officials, and the public; and any accidents or exposure incidents. A chronology serves as a basis for the pollution report (POLREP) and an account of site activities for EPA management, Congress, and the public. The chronology becomes a historical record that may be useful for future removals. It also serves to verify contractor charges, and for recovery actions, that work completed was not inconsistent with CERCLA and the NCP (40 CFR 300.65).

#### **5.1.2 Entry and Exit of Personnel and Equipment**

The names of all personnel and equipment entering and exiting the removal site as well as the dates and time of entry and exit must be recorded. This information is



instrumental in verifying TAT and ERCS personnel and ERCS equipment usage. In addition, entry and exit information of personnel in the hot zone is recommended for personnel safety and verifying protective equipment usage. In the event of exposure, the recorded entry and exit information can help to identify personnel who might have been exposed, and for what length of time.

#### **5.1.3 Contractor Work Planned and Contractor Work Accomplished**

The contractor work authorized by the OSC must be recorded along with the subsequent detail of what work the contractor accomplished. When recorded, this information can assist in reconciling discrepancies and help to verify the Contractor Cost Report (EPA Form 1900-55). In addition, this information serves as a historical record of daily cleanup progress.

#### **5.1.4 Contractor Costs**

A recorded daily account of all costs incurred by the cleanup contractor, including labor, equipment costs, and subcontractor charges, is required in the ERCS contract. Daily cost information is a tool for cost tracking; it helps the OSC recognize an impending need to increase contractor obligation monies or increase the project ceiling. This information can also uncover inefficient or excessive use of labor and equipment. Daily cost information is instrumental in cost recovery actions.

#### **5.1.5 Site Conditions**

It is important to keep a record of weather, ground conditions, and other physical conditions at a removal site in order to account for delays and other on-site problems resulting from such conditions. Information regarding site conditions can also assist in protecting the health and safety of on-site personnel. Examples of relevant site conditions that should be documented include a lightning storm, which requires that the



use of heavy equipment cease until the storm has passed causing project delays, or topographical conditions that create physical hazards that should be noted by all personnel.

#### 5.1.6 Cumulative Project Costs

All on-site project costs, including those incurred by the ERCS contractor, EPA, other Federal agencies, and TAT must be recorded and documented on a daily basis. Maintaining a daily accounting of project costs provides data that can be used in future cost projections. Because the OSC will have a current record of project costs, daily tracking may allow early identification of the need to increase the project ceiling; this in turn may reduce the chance of incurring delays and costs associated with work stoppage while awaiting approval of a request for a project ceiling increase or exemption from the \$2 million ceiling.

## 5.2 OPTIONS FOR DOCUMENTING COSTS

The information described in Section 5.1 can be recorded and preserved through a variety of cost documentation tools. The preferred documentation tool is the computerized Removal Cost Management System (RCMS). Training on Version 3.0 is available on a regular schedule and as requests are made by the Regions. Use of the RCMS fulfills the requirements to document contractor costs, EPA costs, and cumulative project costs. Using the RCMS to document this information can help standardize documentation among sites nationwide, and make it easier to retrieve accurate, consistent information for future projects, cost recovery, ERCS contract definitization, and audits.

The RCMS, however, does not document all of the required information noted in Section 5.1. The forms listed and described below are currently used at many removal actions:

- o OSC Log/Site Log
- o Detailed Daily POLREP
- o Entry and Exit Logs



- o Work Report
- o Cleanup Contractor's Daily Cost Report -- EPA Form 1900-55
- o Incident Obligation Log

Of these forms, only the Contractor Daily Cost Report, the EPA Form 1900-55, is currently required to be completed. The other forms are optional mechanisms to record required site information. EPA Regions and OSCs have the flexibility to either use the forms presented herein or design their own forms to best meet the needs of cost management and documentation at a particular site. To reiterate, documentation of the information presented in Section 5.1 is required, while the particular documentation techniques presented below (except the EPA Form 1900-55) are optional.

#### 5.2.1 OSC Log/Site Log

The OSC Log/Site Log is a legally defensible record with detailed daily entries which discusses, for example, work accomplished at a CERCLA removal site, meetings held or attended, and decisions made. In some cases, the OSC maintains a personal log book, and a separate site log is maintained by the OSC or designee. The site log will only contain information concerning this particular site; the OSC log may also contain personal records and information regarding other sites. A detailed log can fulfill the following documentation requirements: chronology of events and decisions, entry and exit of personnel and equipment, contractor work planned/authorized and accomplished, and site conditions. An example of an entry in a detailed log is presented in Exhibit 5-2.

It is important to note that for enforcement purposes, pages must not be torn out of the bound log book. This is particularly important for cost recovery and for litigation if the State or EPA pursue criminal prosecution.



### 5.2.2 Detailed Daily POLREP

Pollution Reports (POLREPs) must be prepared at the initiation and closing of an action and be prepared daily, weekly, or as the need arises due to changes at the site. A POLREP can include extensive information about activities on a removal site. A POLREP can also be used to fulfill the following documentation requirements: chronology of events and decisions, contractor work planned/authorized and accomplished, site conditions, and cumulative project costs. An example of a detailed POLREP is presented in Exhibit 5-3. For further guidance on POLREPs, refer to section III-G-1 of the Removal Procedures Manual (Revision #3).

### 5.2.3 Entry and Exit Log

The Site Entry and Exit Log is a record of the entry and exit times of all personnel and equipment on site. Any person or equipment leaving the site for any reason, regardless of the duration of time, must be logged out. A Hot Zone Entry and Exit Log may be used to record all personnel entering and exiting the hot zone and the level of protection worn. These logs satisfy the requirement for documenting the entry and exit of personnel and equipment. An example of a personnel and equipment Site Entry and Exit Log is presented in Exhibit 5-4, and a Hot Zone Entry and Exit Log is shown in Exhibit 5-5.

### 5.2.4 Work Report

The Work Report can be used to document contractor work planned/authorized as well as the contractor work accomplished. The Work Report can be used prospectively to detail work to be performed by the contractor, with a summary of work completed added at the end of the day. It can also be used to summarize oral work orders given to the contractor by the OSC and to identify what work was performed. When used prospectively, the written plans for the day can help avoid misunderstandings concerning OSC expectations and instructions. If the Work Report is used prospectively, it is suggested that the



contractor sign the order. An explanation can also be provided to identify problems and changes in work planned/authorized and work accomplished. A Work Report does not have to be prepared daily if a particular phase or type of work is to be performed over a period of days (e.g., drum staging). An example of a Work Report is presented in Exhibit 5-6.

#### **5.2.5 Contractor Cost Report -- EPA Form 1900-55**

The EPA Form 1900-55, which fulfills the requirement to document cleanup contractor costs, is the only mandatory form in the cost documentation system. The EPA Form 1900-55 includes contractor personnel costs, equipment charges, expendable materials, and subcontractor charges. RCMS can be used to complete the required EPA Form 1900-55 in several ways, depending on the length of the removal. For removal actions lasting three days or less, it may be preferable to utilize RCMS in the office after the field activity has been completed. In longer removal actions, daily use of RCMS in the field is recommended. Data entry will usually be performed by the ERCS contractor, either directly or through a contractor-specific software interface. A copy of an EPA Form 1900-55 is presented in Exhibit 5-7. Note that the 1900-55 module of the RCMS can generate this form, as shown in Exhibit 5-7; OSCs are strongly urged to use the software to document cleanup contractor costs each day.

#### **5.2.6 Incident Obligation Log**

The Incident Obligation Log (IOL) is used to record cumulative costs. It provides daily tracking of all costs that are counted toward the total project ceiling. It also tracks the limits for individual cost categories (e.g., ERCS, TAT, EPA, and other Federal agencies). An example of an Incident Obligation Log is presented in Exhibit 5-8. The columns on the left list the cumulative expenditures for each category (ERCS, support contractors, other Federal agency personnel, and EPA direct and indirect costs). Daily costs are listed in the smaller boxes under the appropriate categories. Cumulative costs



are listed in the larger boxes. Another column also provides space for other costs incurred (e.g., State and local agency assistance, utilities, materials). The columns to the right list daily expenditures, cumulative expenditures, and funds remaining on a daily basis. As stated previously, the RCMS will generate a computerized IOL, which can be much easier and less time consuming than generating the IOL manually.

### 5.3 FULFILLING COST DOCUMENTATION REQUIREMENTS

The OSC is required to document each of the six types of site information at a removal action. The documentation method can incorporate any of the six forms presented here or other forms that the OSC considers effective (but always including the EPA Form 1900-55). The OSC or the designated on-site cost manager must prepare a Cost Documentation Index similar to the one in Exhibit 5-9. This Index serves to ensure that each piece of required information has been documented. It also identifies the documentation method used, and the location of the information. Without a Cost Documentation Index, important site information that has been carefully documented may be difficult to find, and therefore may be rendered useless.

### 5.4 THE SITE FILE KIT

The file structure used at each removal site must be consistent, well-organized, and routinely maintained. Ideally, the site file structure should be consistent with the Regional file system. The OERR Office of Program Management issued a suggested organizational system for Regional CERCLA files. This file structure, however, appears to be more detailed than would be necessary for a command post file at a removal action. However, the amount of detail is dependent on the actual removal. For example, if the removal is simple and does not require months of on-site work, then the file structure will be simple. If the removal action is expected to extend for months (a large drum removal), then a more detailed filing system will assist the OSC and the cost manager to





remain organized during the project and once it is completed.

The Office of Program Management is developing a Site File Kit, outlining a consistent documentation structure for all removal sites. Until the kit is finalized, however, the on-scene cost manager should consider utilizing the abbreviated file structure presented below. The file subjects are:

- o Cost Documentation Index
- o Initial Action Memorandum
- o Request for Project Ceiling Increase Action Memorandum
- o Entry and Exit Logs

- o Site
  - o Personnel
  - o Equipment
- o Hot Zone
  - o Personnel
  - o Equipment

- o EPA Form 1900-55
- o Incident Obligation Log (IOL)
- o OSC/Site Log
- o POLREP
- o Site Safety Plan (and modifications)
- o Work Report

Optional information for the site files include, but are not limited to the following:

- o Air Monitoring Data (daily, if applicable)
- o Sampling Plan
- o Sampling Data Reports
- o Quality Assurance Plan
- o Community Relations Plan
- o Justification memos for subcontractors
- o TDDs and Special Project TDDs (if applicable)



The cost manager will be responsible for maintaining files on a daily basis and maintaining the files in the Regional office. Maintaining all relevant documents in the above orderly file system will facilitate the incorporation of the command post files into the Regional office files. Complete, well-organized Regional files will aid in cost recovery and facilitate review by the Inspector General's Office. The file system will also provide readily accessible documents if an OSC is later called to testify on a particular removal action.



Date 4/88

## Exhibit 5-1 COST DOCUMENTATION MATRIX

Required Information	Frequency	Detail of Necessary Information	Reasons for Need	Options for Documenting Costs
Chronology of events and decisions	Daily	<ul style="list-style-type: none"> <li>• Times and dates of all actions taken, all decisions made:</li> <li>• What actions were decided upon and why</li> <li>• Problems encountered on site and how they were resolved</li> <li>• Activities carried out by all personnel on site</li> <li>• All meetings: management, with contractor, with elected officials, with public</li> <li>• Accidents/exposure</li> </ul>	<ul style="list-style-type: none"> <li>• Accountability to EPA management, Congress, the public</li> <li>• Documentation in support of cost recovery (verification that actions taken were consistent with CERCLA and the RCRA)</li> <li>• Historical records -- useful for future removals</li> <li>• Documentation in case of liability</li> <li>• Documentation to certify contractor invoices</li> </ul>	<ul style="list-style-type: none"> <li>• OSC Log</li> <li>• Detailed Daily RUMREP</li> </ul>
Entry and exit of personnel and equipment	Daily	<ul style="list-style-type: none"> <li>• The date, time and name of all personnel and equipment that enter and exit the site</li> </ul>	<ul style="list-style-type: none"> <li>• Verification of EPA Form 1900-55</li> <li>• Documentation to certify invoices</li> <li>• Documentation to verify non-EMCS costs</li> <li>• Documentation to assist in site safety and security</li> </ul>	<ul style="list-style-type: none"> <li>• OSC Log</li> <li>• Entry/Exit Log</li> </ul>
Contractor work planned/authorized and contractor work accomplished	Per work stage	<ul style="list-style-type: none"> <li>• What contractor work was ordered on site</li> <li>• What contractor work was carried out and how it was accomplished</li> </ul>	<ul style="list-style-type: none"> <li>• Reconciliation of discrepancies</li> <li>• Verification of EPA Form 1900-55</li> <li>• Documentation to certify invoices</li> <li>• Historical record of daily cleanup progress</li> </ul>	<ul style="list-style-type: none"> <li>• RUMREP</li> <li>• OSC Log</li> <li>• Work Report</li> </ul>
Contractor costs	Daily	<ul style="list-style-type: none"> <li>• Daily account of all costs incurred by contractor (salaries, equipment costs, subcontractor costs, etc.)</li> </ul>	<ul style="list-style-type: none"> <li>• Required by contract</li> <li>• Documentation for on-going cost projection</li> <li>• Documentation for cost recovery</li> <li>• Highlights any inefficient or excessive use of resources</li> </ul>	<ul style="list-style-type: none"> <li>• EPA Form 1900-55</li> </ul>
Site conditions	Daily	<ul style="list-style-type: none"> <li>• Weather, ground conditions</li> </ul>	<ul style="list-style-type: none"> <li>• Documentation to justify delays, problems</li> <li>• Information to assist in health and safety of on site personnel</li> </ul>	<ul style="list-style-type: none"> <li>• RUMREP</li> <li>• OSC Log</li> </ul>
Cumulative project costs	Daily	<ul style="list-style-type: none"> <li>• All project costs (EPA, TAF, EMCS, etc.) accrued to date</li> </ul>	<ul style="list-style-type: none"> <li>• Information to assist in cost projection -- to prevent delays and increased costs associated with work stoppage while ceiling is increased or \$1 million exemption is approved</li> </ul>	<ul style="list-style-type: none"> <li>• Incident Obligation Log</li> <li>• Daily RUMREP (with detailed cost accounting)</li> </ul>



the cost manager will be responsible for maintaining files on a daily basis and maintaining the files in the Regional office. Maintaining all relevant documents in the above orderly file system will facilitate the incorporation of the command post files into the Regional office files. Complete, well-organized Regional files will aid in cost recovery and facilitate review by the Inspector General's Office. The file system will also provide readily accessible documents if an OSC is later called to testify on a particular removal action.

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## Exhibit 5-2 (Continued)

1200	All personnel break for lunch	1730	Work ceases. Work completed today: Excavated and staged 200 more drums Sampled 75 drums Bulked and transported off site 3,000 gal. organic solvents. Excavated 156 cu yds. soil from 1 excavation. Team complete.
1230	Site work begins again.	1800	All wastebuster's personnel leave site
1300	OSC calls Tom Bradley, Headquarters Contracting Officer, regarding a discrepancy on the 1900-55 form. Discrepancy involves EAC's contractor overcharging for level B protection. Tom says he will look into the matter and get back to OSC.	1830	OSC and both TATs leave site.
1415	Tank truck leaves site with 5,000 gallons bulked liquid. Liquids are organic solvents. All drum waste has now been removed from warehouse except for 10 drums of PCB liquid. Awaiting results from sampling to select disposal option for PCB material.		
1500	OSC receives call from Jim Squires, EPA Enforcement Attorney. Jim says that RP threatening to deny continued EPA access to site if his demands are not met. OSC to meet with Enforcement staff 4/13 to discuss matter.		
1600	Phase 1 of soil excavation complete. 156 cu yds of soil excavated today. 1180 cu yds total excavated. OSC instructs Wastebusters to put one of the front end loaders on standby until soil sample testing results are received.		



## EXHIBIT 5-3

## EXAMPLE OF A DETAILED POLREP

## POLREP

DATE: NOVEMBER 12, 1986

POLREP NUMBER: 10

NAME OF REMOVAL ACTION: ABC DRUM SITE, ANYTOWN, NEW JERSEY

OSC: BRUCE SPRINGSTEEN, REGION II

SITUATION

- A. Rain showers last night created muddy conditions onsite. Weather today was partly cloudy, temperatures in the 50's. Removal Action continues.
- B. Personnel on-scene on 11/11/86:
  - ERCS contractor - 13
  - TAT - 2
  - EPA - 1 (OSC)
- C. RP has threatened to deny EPA access to site if his demands concerning site conditions are not met.

ACTIONS TAKEN:

- A. Excavated 156 cu. yds soil near lagoon this date. 1780 cu yds total have been excavated to date. Phase 1 of soil excavation now complete. OSC awaiting soil sample results to determine if further excavation is needed.
- B. 3,000 gallons of organic solvents from warehouse were bulked and shipped off site to Firesign Incinerators. All drum waste from the warehouse has now been removed except for 10 drums of PCB liquids.
- C. 200 additional drums were excavated and staged. Drum sampling continues. Estimate that 700 drums remain buried.
- D. OSC met with State geologist to discuss the state's groundwater sampling efforts. Preliminary results should be available within 2 - 3 weeks.



**EXHIBIT 5-3, (continued)****FUTURE PLANS:**

- A. Continue drum excavation, staging and sampling.
- B. OSC and Regional enforcement attorney to meet 11/13 to discuss access. RP's actions have not impeded any cleanup work to date. Enforcement will seek court order granting EPA access to site if necessary.
- C. Await soil sample results to determine if further excavation of soil near lagoon is needed.
- D. Evaluate disposal options for hazardous waste on site, including 10 drums of PCB still in the warehouse.

**COST TO DATE**

	<u>TOTAL PROJECT CEILING</u>	<u>COMMITTED/ OBLIGATED</u>	<u>REMAINING CEILING</u>
Cleanup contractor	\$ 500,000	\$ 250,000	\$ 250,000
TAT	50,000	35,000	15,000
NCLP Analytical Service	100,000	100,000	-0-
EERU	35,000	35,000	-0-
Intramural Direct	45,000	22,000	23,000
Indirect	90,000	40,000	50,000

**OTHER INFORMATION**

Removal action expected to be completed within two weeks, as scheduled.



**EXAMPLE OF A PERSONNEL AND EQUIPMENT  
SITE ENTRY AND EXIT LOG**

SITE ENTRY AND EXIT LOG						
Work Site				Date		
TIME		PERSONNEL	REPRESENTING	TIME		EQUIPMENT
In	Out			In	Out	
Comments						



Exhibit 5-5

EXAMPLE OF A HOT ZONE ENTRY AND EXIT LOG

HOT ZONE ENTRY AND EXIT LOG			
Work Site			Date
TIME		PERSONNEL	LEVEL OF PROTECTION
In	Out		
Comments			

**Exhibit 5-6  
EXAMPLE OF A WORK REPORT**

<b>WORK REPORT</b>	
<b>Work Site</b>	<b>Work Period</b> From    /    /                      To    /    /
<b>Contractor</b> <b>Contractor Rep.</b>	<b>OSC</b>
<b>Work Planned/Authorized</b>	<b>Work Accomplished</b>
<b>Equipment Planned/Authorized</b>	<b>Equipment Used</b>
<b>Comments</b>	
<b>Contractor Signature</b>	<b>OSC Signature</b>
<b>Date</b>	<b>Date</b>



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 HAZARDOUS SUBSTANCE RESPONSE FUND CONTRACTOR COST REPORT PAGE 3

US ENVIRONMENTAL PROTECTION AGENCY SITE NAME: LAKE WINNEMUCCA		CONTRACTOR: ACME ENTERPRISES	CONTRACT # 68-01-1959
CONTRACTOR UNIT RATE MATERIALS EPA STANDARD FORM 1900-55		DELIVERY ORDER # 6801-03-195	DATE 09/12/87

18. MATERIAL	19. PURPOSE	20. UNITS	21. QUANTITY	22. UNIT COST	23. COST
ERCS CONTRACTOR 0001: ACME ENTERPRISES					
DISP. AIR FILTERS VISQUEEN	PRSNL. PROT. COVERING	FILTERS ROLLS	0.0 0.0	23.500 50.000	0.00 0.00
					0.00

24. TOTAL U.R. MATERIAL COST TO DATE: \$ 3152.00	25. TOTAL U.R. MATERIAL COST FOR TODAY: \$ 0.00
TOTAL ERCS COSTS TO DATE: \$ 35914.84	TOTAL DAILY ERCS COSTS: \$ 4097.48

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 HAZARDOUS SUBSTANCE RESPONSE FUND CONTRACTOR COST REPORT PAGE 3

US ENVIRONMENTAL PROTECTION AGENCY SITE NAME: LAKE WINNEMUCCA			CONTRACTOR: ACME ENTERPRISES		CONTRACT # 68-01-1959
CONTRACTOR UNIT RATE MATERIALS EPA STANDARD FORM 1900-55			DELIVERY ORDER # 6801-03-195		DATE 09/12/87
18. MATERIAL	19. PURPOSE	20. UNITS	21. QUANTITY	22. UNIT COST	23. COST
ERCS CONTRACTOR 0001: ACME ENTERPRISES					
DISP. AIR FILTERS VISQUEEN	PRSNL. PROT. COVERING	FILTERS ROLLS	0.0 0.0	23.500 50.000	0.00 0.00 <hr/> 0.00
24. TOTAL U.R. MATERIAL COST TO DATE: \$ 3152.00			25. TOTAL U.R. MATERIAL COST FOR TODAY: \$ 0.00		
TOTAL ERCS COSTS TO DATE: \$ 35914.84			TOTAL DAILY ERCS COSTS: \$ 4097.48		

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 HAZARDOUS SUBSTANCE RESPONSE FUND CONTRACTOR COST REPORT PAGE 2

US ENVIRONMENTAL PROTECTION AGENCY  
 SITE NAME: LAKE WINNEMUCCA

CONTRACTOR:  
 ACME ENTERPRISES

CONTRACT #  
 68-01-1959

CONTRACTOR EQUIPMENT REPORT  
 EPA STANDARD FORM 1900-55

DELIVERY ORDER #  
 6801-03-195

DATE  
 09/12/87

9. EQUIPMENT ITEM	10. EQ ID	11. TOT DAY	12. HOURS	13. WORK STATUS	14. RATE	15. COSTS	
						TODAY'S COST	TOTAL TO DATE
ERCS CONTRACTOR 0001: ACME ENTERPRISES							
041:TRUCK VAC 3500 GAL Mileage Charge	2001	12	9.0	REG	DL	307.50	2460.00
		22.0 Miles @		\$ 0.21/Mile		4.62	
057:TRAIL EMERGENCY RES	5001	10	9.0	REG	DL	142.00	851.50
063:TRAIL OFF APPR 8X40	5002	10	9.0	REG	DL	87.00	520.50
076:BACKHOE CAT 225	2003	11	9.0	REG	DL	577.00	4039.00
086:FRT END LD CAT 966	5003	10	9.0	REG	DL	673.50	4039.50
205:CYANIDE MONITOR	2003	12	9.0	REG	DL	62.00	494.50
298:COMPUTER PORTABLE-PC	5555	12	This item is RENTED				
			9.0	REG	DL	31.00	247.50
G and A Charge						3.10	
800:SWIMMING POOL	6666	11	9.0	REG	DL	15.50	107.50
						<u>1903.22</u>	
16. TOTAL EQUIPMENT COST TO DATE: \$ 12827.59				17. TOTAL EQUIPMENT COST FOR TODAY: \$ 1903.22			



## INCIDENT OBLIGATION LOG

Page 1

From: 09/01/87 To: 09/11/87

Site Name: LAKE WINNEMUCCA

Project Ceiling:

09/01/87 750000

09/11/87 1000000

Date/ TTD	1900-55 Costs	Await Bill Change	EPA Costs	O. Fed Costs	TAT Costs	Add'nl Costs	Total Costs	Balance
09/01/87	4037	176	2004	900	724	500	8341	
	4037	176	2004	900	724	500	8341	741659
09/02/87	2183	165	1494	2050	958	0	6849	
	6220	341	3498	2950	1141	500	15190	734810
09/03/87	3766	0	2952	1966	936	873	10493	
	9986	341	6450	4916	2077	1373	25683	724317
09/04/87	4501	0	2782	1928	1126	0	10337	
	14487	341	9232	6844	3203	1373	36020	713980
09/05/87	3045	258	1464	1437	874	342	7419	
	17532	599	10696	8281	4076	1715	43440	706560
09/06/87	1555	0	594	997	454	127	3727	
	19087	599	11290	9278	4530	1842	47167	702833
09/07/87	1483	0	704	997	454	145	3782	
	20570	599	11994	10275	4984	1987	50949	699051
09/08/87	3595	0	1606	1877	1427	0	8505	
	24165	599	13600	12152	6025	1987	59454	690546
09/09/87	2973	0	1516	1995	1021	0	7504	
	27138	599	15116	14147	7046	1987	66958	683042
09/10/87	4003	0	1516	1995	874	0	8388	
	31141	599	16632	16142	7919	1987	75346	674654
09/11/87	3085	-423	1516	1995	544	0	6717	
	34226	176	18148	18137	8463	1987	82063	917937



## Exhibit 5-9

## EXAMPLE OF A COST DOCUMENTATION INDEX

COST DOCUMENTATION INDEX	
Work Site _____	Period of Removal Action _____
Location _____	OSC _____
INFORMATION REQUIRED	DOCUMENTATION TECHNIQUE
Chronology of Events and Decisions	<input type="checkbox"/> OSC Log <input type="checkbox"/> POLREP <input type="checkbox"/> Other. Specify: _____
Entry and Exit of Personnel and Equipment	<input type="checkbox"/> OSC Log <input type="checkbox"/> Site Entry/Exit Log <input type="checkbox"/> Hot Zone Entry/Exit Log <input type="checkbox"/> Other. Specify: _____
Contractor Work Planned/ Authorized and Contractor Work Accomplished	<input type="checkbox"/> POLREP <input type="checkbox"/> OSC Log <input type="checkbox"/> Work Report <input type="checkbox"/> Other. Specify: _____
Contractor Costs	<input type="checkbox"/> EPA Form 1900-55 (mandatory)
Site Conditions	<input type="checkbox"/> POLREP <input type="checkbox"/> OSC Log <input type="checkbox"/> Other. Specify: _____
Cumulative Project Costs	<input type="checkbox"/> Incident Obligation Log <input type="checkbox"/> POLREP <input type="checkbox"/> Other. Specify: _____

