Site Management Plan

for the

American Creosote Works Project

Formerly known as
American Creosote Works-Winnfield Plant
Winnfield, Louisiana

Prepared for:

EPA Region VI

Prepared by:

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1. Project Management

This Site Management Plan (SMP) presents CH2M HILL's project team, management structure and responsibilities, as well as the procedures to be followed to control site access and security. This document was prepared to fulfil the requirements of EPA WA 035-RARA-06G3 SOW Task 3, Item 3.1 (EPA, March 16, 1999). The original version of this SMP was prepared by IT Corporation in accordance with the U.S. Army Corp of Engineers (USACE) Contract Specification Section 13980: Security, and has been updated to incorporate CH2M HILL's long-term site management strategy.

1.1 Project Leadership Team Responsibilities

EPA's Work Assignment Manager (WAM) for this long-term remedial action (LTRA) is John Meyer. Mr. Meyer is responsible for all project-related actions required of this work assignment. The WAM has review and approval authority for all CH2M HILL deliverables and project activities. Contract administration will be provided by Tom Reilly, Project Officer (PO), and Deborah Ponder, Contract Officer (CO).

CH2M HILL has assigned Bill Faught has the Project Manager. Mr. Faught is based in our Houston, Texas where he has resided for the last 10-years of his 19-year CH2M HILL career. The project's team of technical specialists (see Figure 1) were selected based on their specific qualifications and past experience in each of the assigned areas identified in the SOW. The technical leadership team will include Scott McKinley serving as the Design Manager and Lead Hydrogeologist, Dr. Gary Hickman as the Bio-remediation Technical Lead, and Dan Anderson as the project Data Manager. Scott and Gary are based in Corvallis, Oregon while Dan is based in Houston.

At the project execution level, Richard Hervey (Corvallis, Oregon) will serve as the Project Engineer responsible for issues regarding extraction and treatment system (or PLTS) operations, and Scott Rhodes (Houston, Texas) will be responsible for field sampling and data collection related field tasks. Scott will also serve as assistant to the lead hydrogeologist. Operation of the American Creosote Works Winnfield, LA facilities will be performed by John Nugent, Joe Hambrick and one or two subcontractors. Mr. Nugent serves as the lead operator and maintenance chief, while Mr. Hambrick provides analytical, data collection and administrative systems support. Subcontractors to provide site security, landscape maintenance, laboratory services and hazardous waste disposal are anticipated.

CH2M HILL's Dallas-based RAC 6 Program Support staff, led by Mr. Al Sloan, Program Manager will assist the project staff in project setup, scheduling, accounting, and monthly reporting/invoicing. Don Seward serves as CH2M HILL's RAC 6 Contract Financial/Administrative Manager and Dale Foster, serves as Project Controls Engineer. These staff will provide contract administration and financial project controls support. Each of these team members has extensive experience working on RAC contracts and specifically RAC 6 WA's.

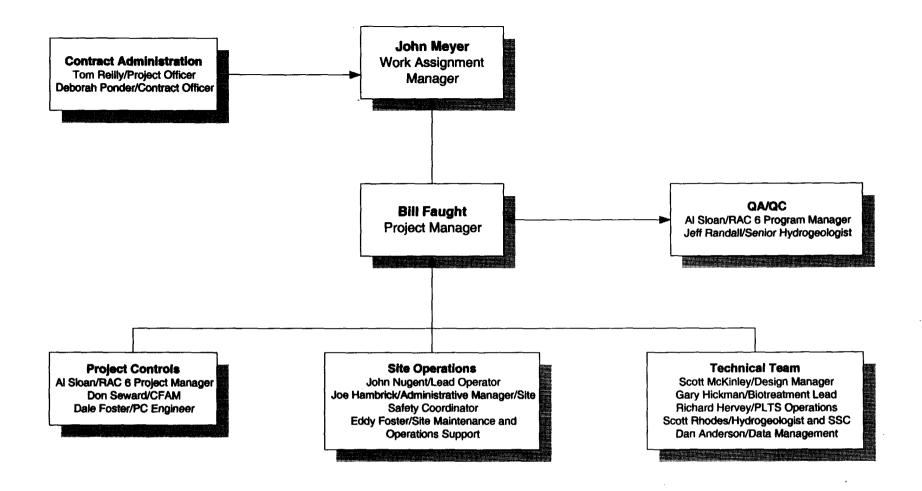


FIGURE 1

Project Organization Chart Site Management Plan American Creosote Works Winnfield, LA

1.2 Quality Control Measures

As is the case for all RAC 6 technical WAs, the project team will be supported by a review team of professionals led by a Review Team Leader (RTL). The RTL for this WA is Jeff Randall, a senior hydrogeologist with LTRA project experience. Jeff Randall is a registered professional engineer with nearly 20 years of experience in design and operations of pump and treat groundwater systems. Jeff brings his most recent experience from CH2M HILL's project at Wycoff-Eagle Harbor to the American Creosote project. The Wycoff project is an operating system for a creosote based Dense Non Aqueous Phase Liquid Pump and Treat (NAPL P&T) located in Seattle, Washington (EPA RAC 10). Jeff, along with the program manager, Al Sloan will be responsible for assisting with technical strategy development and review of major project deliverables prior to EPA submittal. Team members will also serve as a technical resource to the project team throughout the duration of the WA on an as-needed basis. These activities will occur per the quality management system described by the CH2M HILL Quality Management Plan (QMP) provided in the RAC 6 Standard Operating Procedures, submitted to EPA Region VI in October 1994.

The CH2M HILL project manager (PM) is ultimately responsible for ensuring that all project activities are completed in accordance with the requirements set forth in the approved EPA Work Plan and those listed in this document. The PM will visit the site at least monthly and during the visit, he will perform a safety and contaminated materials handling review. The PM is responsible for ensuring all accidents and incidents on the project are reported and thoroughly investigated. The PM must approve in writing any modification the either the Health & Safety Plan, Transportation and Disposal Plan/Waste Handling Plan or this Site Management Plan. The PM along with the EPA WAM will have the authority to stop work on the project and shut down site operations if an imminent hazard exists. The PM also has the authority to dismiss employees and to implement performance improvement programs.

Technical Specialists- The various technical specialists assigned to this project are responsible for providing the expertise necessary to conduct day-to-day operations, and to develop programs to optimize and accelerate the remedial action. These staff include the Lead Hydrogeologist, Bio-Remediation Technical Lead, the Project Engineer/Operations Consultant, Data Manager and/or any associated staff working temporarily at the site for non-PLTS operational WA tasks (e.g. confirmation sampling, RI sample collection, etc.). These staff will be required to be HAZWOPPER trained and current in the medical surveillance program. They will also be required to cooperate fully with the SSC while onsite.

CH2M HILL will have at least 2 operations staff and one grounds-maintenance staff onsite full time during operation of the PLTS. These staff will be fully responsible for operation of the PLTS. Safety operation and continuous improvement of personal and teamwork performance are each and every CH2M HILL employee's responsibility. One of the 3-onsite staff will be defined as the SSC and the others will be participants of the operations team.

The Lead Operator is responsible for routine and unusual operational needs of the PLTS. He also is responsible for ensuring that well field operations are performing as designed. Equipment maintenance and repair/replacement activities are within the lead operator's perview. He will also interface with the PM, the offsite technical staff and CH2M HILL Dallas based support staff.

The Administrative Manager/ Site Safety Coordinator's (AM/SSC) administrative task include responsibility for the financial records management, equipment / supplies purchasing and all reporting activities at the site. He will interface closely with the PM on financial and staffing matters as well as the Dallas based RAC 6 CRAM and PC staff. Weekly and monthly reports on operations and administrative / cost management will be prepared by the AM/SSC. He will also be responsible for

controlling government owned equipment and will serve as the "property control representative". Finally, the AM/SSC will make all decisions on site safety issues.

The AM/SSC's safety tasks include responsibility for conducting daily inspections of the work areas to determine if operations are being conducted in accordance with the H&S Plan and to determine if changes to Personal Protective Equipment or air monitoring program are required. The AM/SSC is also responsible for monitoring routine onsite staff work practices to ensure their approach does not jeapordize the safety of other staff or the environment. The AM/SSC reports directly to the PM in the integration of authority process. The AM/SSC has access to all of CH2M HILL's safety personnel listed in the H&S Plan including the CIH staff, medical doctors and associated consulting specialists.

In addition to his administrative and safety duties, the AM/ provides analytical, data collection and administrative systems support and serves as the back up PLTS operator.

The Site Maintenance / Operations Support role will primarily involve assisting the lead operator with repair and routine maintenance activities for the PLTS, maintaining grounds appearance and will assist with site security, as needed. These actions will include lawn mowing, road repair, and general site dictated repair activities.

2. Security

The site will be patrolled by security personnel using subcontractor (local firm) personnel from dusk to dawn (basically during overnight/dark hours) seven days per week or as necessary to protect the extraction and treatment operations system and all other support equipment. Security personnel will monitor the fence line and patrol the site during the security shift. They will interface with and rely on local law enforcement officials, emergency medical units, local fire departments, and utility emergency teams to ascertain the type of response required, when necessary, and to coordinate the responses of various units. The security firm will not be expected to protect the property in the event of a hazardous waste release, but will ensure that the proper authorities and CH2M HILL project manager are contacted.

Access to the site will be controlled with security fencing, lighting, warning signs, and by security personnel. Entrance to the site will be restricted to specific points controlled and monitored by security personnel (see Figure 2). Only project personnel, subcontractor personnel, and authorized visitors with proper identification will be allowed access to the site. Vehicular control will be provided through the use of proper vehicle identification, with access only through controlled access points. A security log (Figure 3) will be maintained on a 24-hour basis. During the periods when security personnel are not present (day light hours), the operations staff will be responsible for maintaining a safe and secure work area and for keeping the visitors log current.

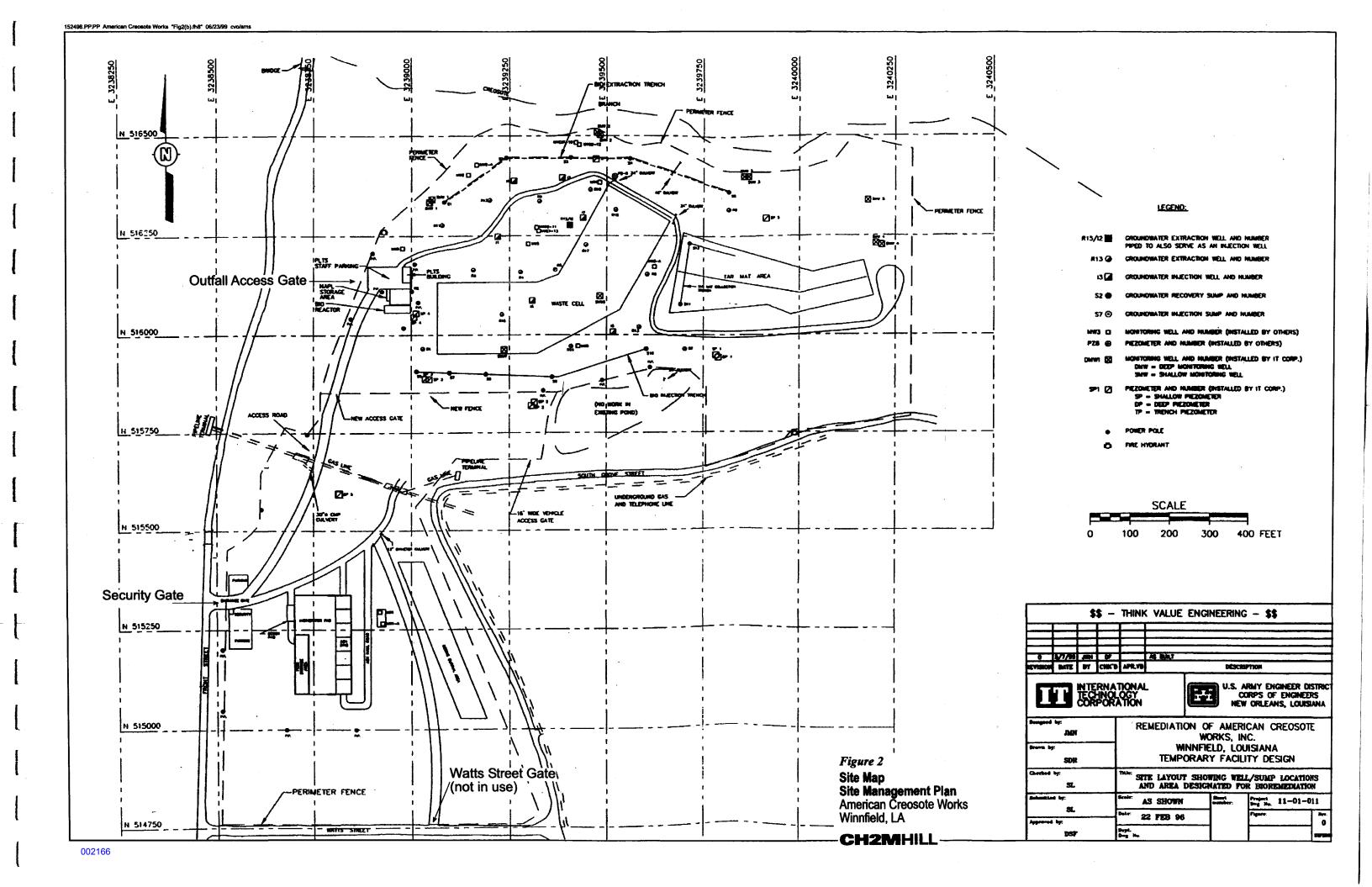
The Security Officer reports to the Site Safety Coordinator (SSC) for routine operations. However, the Security Officer will also interface CH2M HILL's Project Manager, as required, on emergency security matters.

It has not been, in the past, necessary for the security officers to be armed nor have trained guard dogs been used at the American Creosote Works site. This is however subject to change as situations dictate.

2.1 Security Facilities

Control of security operations for the project will be by security personnel conducting their operations from the current office space at the site. This office space is equipped for this service and dedicated to the site.

The security office is located at the contractors entrance gate on Front Street, the primary entrance to the site. The office will be the base from which the security officer monitors and controls site security. In addition to standard office equipment such as a desk, table, and filing cabinet, the security office will have a dedicated telephone circuit with an extension to the PLTS control room.



SECURITY OFFICER'S SHIFT ACTIVITY REPORT

CLIENT - American Creosote Works/CH2M HILL -EPA- Winnfield, LA.

							T	T
Security Officers Name:							CH2M HILL Reviewers Name:	
Date	:							
Time	:							
Start	ing M	ileage	e: Ending Mileag	ţe:	Total	Miles 1	For Shift:	
Inspe	ected I	Ву:						Time of Inspection:
Yes			nber must be checked s checked Yes must be	ПЕМ	TIME	PR	INT PLAINLY - USE BALL POINT PEN ONLY	
		No	Were There Any:					
1.			New Instructions Received					
2.			Rounds Made Stations Missed					
3.			Fire Doors, Fire Lanes, Exits Blocked					
4.			Any Other Fire Hazards					
5.			Defective Security or Exit Lights					
6.			Other Security or Safety Hazards					
7.			Motor, or Equipment Left On					
8.			Doors or Windows Left Open or Unlocked					
9.			Violations of Client's Rules or Policies					
10.			Property Damage or					

FIGURE 3
Security Log
Site Management Plan
American Creosote Works
Winnfield, LA

2.1.1 Perimeter Fencing

Fencing currently exists around the site perimeter. Existing fencing will be repaired and maintained by CH2M HILL when and where needed. In addition, temporary fencing will be installed, relocated, and removed, as necessary, to maintain security. The SSC will supervise the installation of all barricades and warning tape to define any required exclusion zones during periods of potentially hazardous activities. The SSC will also monitor personnel passing through the perimeter access during periods when security is not on duty.

2.1.2 Security Lighting

Temporary outdoor lighting has been installed at perimeter locations for the duration of the project to aid in surveillance activities at night. Additional lighting will be placed on the perimeter fence line in the future as deemed necessary by the SSC. Fixtures will be floodlights controlled by a photoelectric cell. Fixtures will be maintained and operational at all times at the contractors entrance gate.

2.1.3 Security Equipment

The project site will be adequately equipped to ensure that security operations can be sufficiently carried out. The following equipment will be dedicated to security operations:

- Main entrance gate to control traffic at vehicle entry
- Telephone extension at contractor entrance gate
- The existing hand-held radios with a security-dedicated frequency will be issued to the Security personnel include the: 1) Security Officer, 2) Site Safety Coordinator and 3) Control Room Operator

2.1.4 Signs

The current signs will be left in place on the site perimeter as was required by the USACE contract until such time as CH2M HILL personnel are allowed to assess their appropriateness and replace them with the signage reflecting the status of current operations and danger posed by site operations. The security officer shall monitor all the signs to ensure they are remained in place and will notify SSC when replacement is required.

Signs located within the site area will be placed by SSC, as deemed necessary. These signs will, at a minimum, designate contaminated areas, exclusion zones, reduction zones and other zones, as appropriate for the work activities. The Security Officer will monitor these signs and barricades during patrols.

2.2 Security Operations

Access to the project site will continue to be tightly controlled and will be limited to the main gate. Access to exclusion zones and contamination reduction zones will be determined by the SSC and controlled by H&S personnel.

2.2.1 Access Control

The primary responsibility for the contractor's security officer is the control of vehicles and personnel entering and leaving the site. Control to the site is provided by the perimeter security fence, which has specific points, established to gain access to the interior. Access gates will remain locked when unattended.

specific points, established to gain access to the interior. Access gates will remain locked when unattended.

Security personnel will check the fence integrity on a daily basis. Needed repairs will be noted in the security log and reported to the SSC and PM at the end of each shift. The PM will schedule and complete any necessary fence repairs within 72 hours.

Security personnel will continuously monitor the main gate while personnel are on the site. Personnel and vehicles passing through an access gate must have clearance from the PM or SSC and be logged in and out on the visitors form.

Security personnel will conduct periodic patrols around and through the site during shift hours. The gate will be locked while security personnel are on patrol. Personnel on patrol will remain in radio contact with their dispatch office.

2.2.2 Personnel Control

The main gate will be manned by security personnel except when they are on patrol or when PLTS operations personnel are onsite. CH2M HILL employees must have PM or SSC clearance to obtain access to the site and they will be required to be logged in the visitors log form (see Figure 4). Subcontract employees will be logged in/out by company and employee name, as well. No badges will be issued. Visitors must also log in/out by company, name and address. The main access gate will be used for CH2M HILL, EPA and visitor entrance.

Telephone extensions will be installed in the security office at the contractor entrance to allow communication with personnel onsite.

2.2.3 Vehicle Control

Only authorized vehicles will be allowed access past the guardhouse and onto the site. Vehicle access will be granted for only company-owned vehicles, rental cars and authorized personnel vehicles. Subcontractor, service, and delivery vehicles will be logged on/off the site at the contractor's entrance gates.

To prevent loss of government and CH2M HILL property, all vehicles and personal items shall be subject to a search by the Security Officer. Personnel leaving the site shall, at the request of the Security Officer, open their trunk, glove box, toolbox, lunch box, or any other container that could contain EPA or CH2M HILL property. Personnel shall sign the visitor control log prior to entering or leaving the site.

2.2.4 Vehicle Parking

Parking of vehicles onsite will be in designated areas inside the Front Street (main) gate and at the PLTS. The SSC and Operations staff will assist with visitor parking and traffic, as appropriate. Please contact these staff or the security officer if the area is full or if an accident occurs due to onsite travel. Visitor parking will be exterior to the site if the visitor is traveling in a personal (non-company or rental) car. Employee parking will be at the PLTS area.

AMERICAN CREOSOTE WORKS

CH2M HILL Superfund Site

VISITORS/VENDORS REGISTER

DATE:				
NAME/COMPANY	SIGN NAME	TIME IN	TIME OUT	TIME
		· · · · · · · · · · · · · · · · · · ·		

FIGURE 4 Visitor Log Site Management Plan American Creosote Works Winnfield, LA

2.3 Emergency Responses

Security personnel and the SSC will be closely involved with any emergency response resulting from fire, potential chemical agent exposure, potential explosive situations, adverse weather conditions, H&S incidents, or contaminant spills. Procedures to be followed in an emergency are detailed in the Emergency Response section of the Health and Safety Plan developed for this project. In brief however, the SSC and the security official will take control in an emergency. The CH2M HILL SSC will be the primary man in charge if present, if not, the security officer will be until such time as the emergency official or CH2M HILL PM arrive and take control.

2.3.1 Interfacing with Local Law Enforcement and Emergency Organizations

The SSC will coordinate and cooperate with emergency and non-emergency visits by local law enforcement agencies, emergency medical care units, and emergency utility teams. Such visits for the purpose of drills or practice shall be coordinated through the PM.

2.3.2 Security Records

The Security Officer, with support from site administration, is responsible for maintaining and updating a list of authorized project personnel, visitors and subcontractors (all visitors) through the duration of the project.

A log containing names and signatures of all people entering the site will be kept to record entry and exit times.

A complete and detailed description of any breach of security incidents that occur and the resultant actions taken shall be duly documented in the daily log.

2.3.3 Breach of Security

Access by Unauthorized Personnel

If unauthorized personnel are discovered on the site, the security officer shall immediately escort them from the site. In the event unauthorized personnel are uncooperative, local law enforcement will be notified immediately for assistance in removal of the individual(s). The PM will be notified immediately when local law enforcement is contacted.

Unauthorized Access Points

Unauthorized access points are those points other than those designated permanent or temporary. Any discovery of unauthorized access points will be reported immediately to the security officer who will take immediate action to investigate the cause and effect repairs.

Documenting Breach of Security

Any breach of security discovered will be completely documented (see Figure 5). Additionally, the Security Officer investigating the breach will complete a report documenting the breach. The report will be available to the EPA and CH2M HILL PM upon request from the security personnel.

Should unauthorized Individuals enter the Exclusion Zone and/or the Contamination Reduction Zone they will be subject to decontamination prior to being allowed to exit the site.

AMERICAN CREOSOTE WORKS

CH2M HILL Superfund Site

BREACH OF SECURITY REPORT

Breach discovered by:	Date:	Time:
Location:		
Unauthorized Personnel:		
Action to Repair Breach-		
Avoidance Recommendation:		
Other Comments:		
Investigator:	Date:	Time:
cc: CH2M HILL SSC Project Manager		

FIGURE 5
Breach of Security Log
Site Management Plan
American Creosote Works
Winnfield, LA

Attachment 1 Employee Signoff

EMPLOYEE SIGNOFF

The employees listed below have been given a copy of this health and safety plan, have read and understood it, and agree to abide by its provisions.

EMPLOYEE SIGNATURE AND DATE

Attachment 2 Material Safety Data Sheets

Attachment 3 Self Assessment Audit Checklist

Attachment 4 Subcontractor Safety Instructions (To be provided once Security Subcontractor selected)

Attachment 5 List of Trained Personnel

David Mustonen	CVO	Field Team Member	SSC Level D; FA-CPR
Mary Camarata	cvo	Field Team Member	FA
Jay Celorie	cvo	Field Team Member	FA
Barry Collom	cvo	Field Team Member	SSC Level B; FA-CPR
Landon Collom	cvo	Field Team Member	SSC Level C; FA-CPR
Alan Davis	CVO	Field Team Member	SSC Level D; FA-CPR
Jody Farley	cvo	Field Team Member	
Jacqueline Frizenschaf	cvo	Field Team Member	SSC Level D; FA-CPR
Andrew Hoffman	cvo	Field Team Member	SSC Level D; FA-CPR
William McKinley	CVO	Field Team Member	SSC Level B; FA-CPR
Pratt Randy	CVO	Field Team Member	FA
Robin Strauss	CVO	Field Team Member	SSC Level D; FA-CPR
Mike Abbott	PDX	Field Team Member	Level D SSC; FA-CPR
Joel Bowker	PDX	Field Team Member	SSC Level C; FA-CPR
Bruce Brody-Heine	PDX	Field Team Member	SSC Level D; FA-CPR
Pamela Brody-Heine	PDX	Field Team Member	FA-CPR
Phillip Brown	PDX	Field Team Member	FA
Joshua Butler	PDX	Field Team Member	FA-CPR
John Childs	PDX	Field Team Member	FA
Todd Cotten	PDX	Field Team Member	SSC Level D; FA-CPR
Dave Dailer	PDX	Field Team Member	SSC Level D; FA-CPR
Scott Dethloff	PDX	Field Team Member	FA-CPR
Matt Dwyer	PDX	Field Team Member	SSC Level D; FA-CPR
Ivan Gall	PDX	Field Team Member	SSC Level D; FA-CPR
Taylor Gehweiler	PDX	Field Team Member	SSC Level C; FA-CPR
Bill Griffin	PDX	Field Team Member	SSC Level C; FA-CPR
Tim Hemstreet	PDX	Field Team Member	
Joseph Hurliman	PDX	Field Team Member	SSC Level D; FA-CPR
Richard Johns	PDX	Field Team Member	SSC Level C; FA-CPR

James Jordahl	PDX	Field Team Member	********
Mike Keating	PDX	Field Team Member	SSC Level C; FA-CPR
Robert Koster	PDX	Field Team Member	FA-CPR
Marcus Krekos	PDX	Field Team Member	SSC Level B; FA-CPR
Paul LaFrance	PDX	Field Team Member	FA
Aaron Leritz	PDX	Field Team Member	SSC Level D; FA-CPR
Darren Nakata	PDX	Field Team Member	SSC Level D; FA-CPR
Stephen O'Malley	PDX	Field Team Member	SSC Level C; FA-CPR
Gerald Ochs	PDX	Field Team Member	SSC Level D; FA-CPR
Valerie Panek	PDX	Field Team Member	SSC Level D; FA-CPR
John Porcello	PDX	Field Team Member	SSC Level C; FA-CPR
Ross Rieke	PDX	Field Team Member	FA
Dawn Sanders	PDX	Field Team Member	SSC Level C; FA-CPR
Jamie Tielens	PDX	Field Team Member	SSC Level D; FA-CPR
Andrea Volkman	PDX	Field Team Member	
Mark Wiganomicz	PDX	Field Team Member	FA-CPR
Judi Radloff	SEA	Field Team Member	Level C SSC; FA-CPR
Marian Allen-McDermott	SEA	Field Team Member	FA-CPR
Jim Bushnell	SEA	Field Team Member	SEA FA-CPR
Doug Kunkel	SEA	Alternate SSC	Level C SSC; FA-CPR
Ken Scheffler	SEA	Alternate SSC	Level D SSC; FA-CPR
Paul Townley	SEA	Alternate SSC	Level D SSC; FA-CPR
Marshall Carpenter	SEA	Field Team Member	FA-CPR
David Corbett	SEA	Field Team Member	FA
Jim Crawford	SEA	Alternate SSC	Level C SSC; FA-CPR
John Culley	SEA	Alternate SSC	Level D SSC; FA-CPR
Karen Dawson	SEA	Field Team Member	FA-CPR
Stacia Dugan	SEA	Field Team Member	FA-CPR
Marilyn Gauthier	SEA	Alternate SSC	Level D SSC; FA-CPR
Waymon Gay	SEA	Alternate SSC	Level C SSC; FA-CPR
Duane Hicks	SEA	Alternate SSC	Level B SSC; FA-CPR
Doug Holsten	SEA	Alternate SSC	Level D SSC; FA-CPR

Carolyn Kossik	SEA	Field Team Membe	FA-CPR
Kenneth Lilly	SEA	Field Team Member	FA-CPR
Liz Luecker	SEA	Field Team Member	FA
Jim Mavis	SEA	Field Team Member	FA-CPR
Burt Miller	SEA	Alternate SSC	Level D SSC; FA-CPR
Susan Moore	SEA	Alternate SSC	Level D SSC; FA-CPR
Doug Navetski	SEA	Field Team Member	FA-CPR
Rob Piekarz	SEA	Alternate SSC	Level C SSC; FA-CPR
Amanda Pyle	SEA	Field Team Member	
Michael Reimbold	SEA	Alternate SSC	Level C SSC; FA-CPR
Lisa Saban	SEA	Field Team Member	FA-CPR
King Sampaco	SEA	Field Team Member	FA-CPR
Jennifer Schaeffer	SEA	Field Team Member	FA-CPR
Ken Swindaman	SEA	Surveyor	FA-CPR
Alta Turner	SEA	Field Team Member	FA-CPR
Glen Vedera	SEA	Alternate SSC	Level B SSC; FA-CPR
Theo von Wallmenich	SEA	Alternate SSC	Level D SSC; FA-CPR
Dan Winstanley	SEA	Field Team Member	FA-CPR
Natalie Young-Pong	SEA	Field Team Member	FA-CPR
Artemis Antipas	SEA	Field Team Member	FA-CPR
Mike Cooley	SEA	Field Team Member	Level D SSC; FA-CPR
Fred Bauhof	HOU	Field Team Member	FA
Kirk Brandt	HOU	Field Team Member	Level B SSC; FA-CPR
Carroll Burton	HOU	Field Team Member	Level D SSC; FA-CPR
Brian Casey	HOU	Field Team Member	FA
Valeria Collier-Vick	HOU	Field Team Member	CPR
Deborah Danitz	HOU	Field Team Member	· FA
Robert Davis	HOU	Field Team Member	FA-CPR
Michael Dennis	HOU	Field Team Member	FA
Steven Fenney	HOU	Field Team Member	
Justin Harris	HOU	Field Team Member	Level D SSC; FA-CPR
Daniel Hernandez	HOU	Field Team Member	Level C SSC; FA-CPR

Tracy Ingram	HOU	Field Team Member	FA-CPR
Thomas Johnson	HOU	Field Team Member	CPR
Steven Mellon	HOU	Field Team Member	
Terese Moreno	HOU	Field Team Member	Level C SSC; FA-CPR
Timothy Piendel	HOU	Field Team Member	
Hunter Sartain	HOU	Field Team Member	FA-CPR
Susan Spore	HOU	Field Team Member	