

Only Perform “Essential” Activities • Stay Home • Stop the Spread • Save Lives

March 25, 2020

To: Clients of Project Navigator, Ltd., in PNL’s role as a Remediation Site,
Project Coordinator (PC)

From: Ian A. Webster

Subject: Our Company’s reaction to the CV-19 virus threat, and how we will advise our PRP clients in the months ahead; see **Attached Figure**.

During the past 20 years, PRP Groups have employed Project Navigator, Ltd. (PNL) to “project coordinate” some of your sites’ remediation activities; and most fundamentally, manage project and work execution risks. PNL has been proud of using *facts and data to assess situations and drive work actions in the most appropriate, and safety conscious manner*. Today, in the virus situation that we all *personally and together* confront, this same PNL discipline of thought and counsel continues. No doubt, the virus propagation risk, when considered at the level of onsite activities, presents a challenge never before faced in our professional lifetimes.

Within PNL, in addition to *practicing the five habits*¹ to break the virus’s transmission chain across the projects we manage for PRP Groups, and in consultation with the projects’ consultants and EPCs, we are reviewing all ongoing site activities and projected activities for at least the next 3 months. Notably and admirably, this has been specifically requested by some clients.

Via this forecasting, we will be dividing (esp. field) tasks into two buckets, as further described in the **Attached Figure**:

¹ HANDS, Wash them often • ELBOW, Cough into it • FACE, Don’t touch it • SPACE, Keep safe (6ft) distance •, HOME, Stay there and work from there. More here: <https://www.cdc.gov/>

1. Field tasks and work activities which are “**essential**” for the protection of human health and the environment, and must be undertaken and/or continued, *versus*
2. Field activities which may, in the past, have been “administratively broadly classified as essential;” but candidly, when one further reviews the task, today, under a “risk-of-personnel to virus exposure” Vs the “reward of a few more data points” lens, one concludes that the task or event can be delayed for a few months.

We are all receiving notices from consultants, contractors and labs saying they are also practicing the five habits and stand ready to undertake field actions. These notices imply that field work can proceed. At PNL, however, we are advising that each action should only occur based on its specific needs and merits; and not simply because, to use a specific example, routine annual groundwater monitoring has been triggered by a schedule in a long-ago formulated workplan. The environmental services business world is practicing the CDC recommendations, but, such as life is at present, external vectors will exist which our field crews will come into contact with as they simply travel to job sites, eat and possibly sleep in hotel rooms.

In conclusion, realize that the mechanics do exist for you to discuss what actually are **really essential activities** with your regulator; as [John McGahren, Esq., and his colleagues at Morgan Lewis have just described](#). Basically, consider work on a task-by-task, site-by-site basis and discuss the activity with the EPA RPM or designated regulator. This is how PNL will act, advise and consult during the current virus situation.

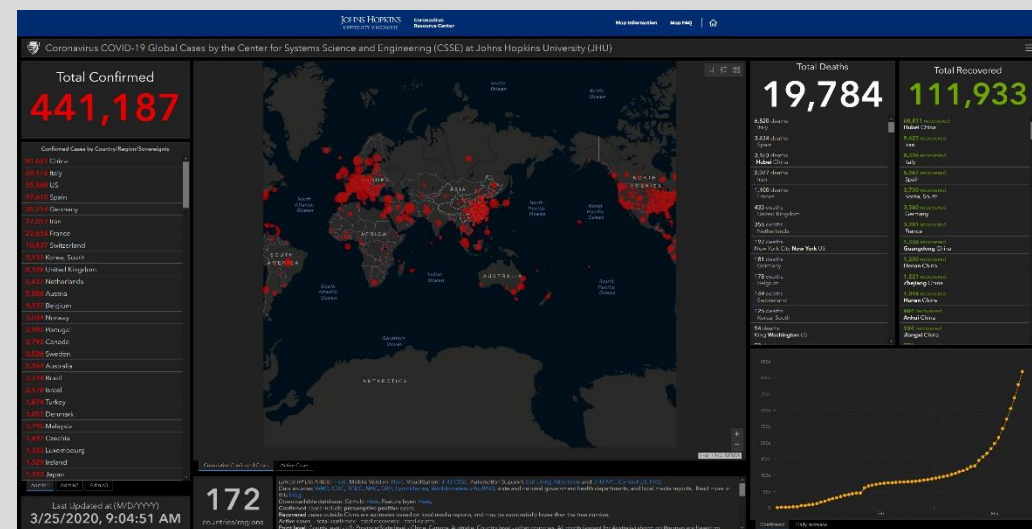
Feel free to contact me directly, should you have any questions or wish to discuss. I’m at 714-863-0483 (mobile) and jwebster@projectnavigator.com. All PNL personnel have openly discussed what is described above, and you are welcome to contact any one of us.

How Project Navigator, Ltd. (PNL) Will Perform Our Project Coordination (PC) Duties, Manage Project Activities, and Advise PRP Clients during the Covid-19 Situation

- To date, in an ever-evolving virus situation, various State and Federal entities have classified our activities in the management of hazardous wastes and spill response as “essential.”
- PNL will advise PRP clients on the need to perform onsite operations and routine OM&M.
- Our Action: Timeline review vs. activity necessity.

PNL’s Immediate Mission & Operating Culture:

Contribute, in any way we can (company practices; advice to clients), to flatten the curves.



<https://coronavirus.jhu.edu/map.html>

- ✓ **Only perform “truly essential activities”**
Work with PRP clients and regulators to define what they are
- ✓ **Stay home**
- ✓ **Stop the spread**
- ✓ **Save lives**

