



**CEMENT PLANTS, MANUFACTURING FACILITIES, AND
OTHER PROCESS PLANT PROJECT EXPERIENCE**

Type of Project	Description of Services Provided	Project Location
Cement Plant	On behalf of the owner, analyzed a \$60 million claim from the general contractor related to alleged project delay, increased scope and loss of labor productivity. The project was for the expansion of an existing cement manufacturing plant in Florida and involved the construction of an additional 2800 ton per day production line from raw material handling through bulk material load out. Performed schedule quality assurance reviews of the contractor's contemporaneous schedules to correctly quantify project delay and disruption from alleged late delivery of owner equipment. Worked closely with the owner to resolve problems contained within the contractor's contemporaneous schedules such as open-end activities, overuse of constraints, missing original scope, incorrect as-built dates, missing as-built dates, and missing logic links.	Florida
Cement Plant	Assisted the owner in the defense of a \$12 million claim on a project involving the design, delivery and construction of a new cement production line from ore receiving to finish mill and product loadout. The EPC contractor claimed for increased costs due to alleged owner-caused delays and disruption arising from late delivery of proprietary design information, and late delivery of materials and equipment, and impacts to labor productivity due to numerous changes to the work and contractor's alleged acceleration to overcome delays.	Florida
Cement Plant	On behalf of the owner, evaluated a piping contractor's claim associated with increased piping quantities for the construction of a cement plant. Prepared an Expert Report and testified in arbitration.	Florida
Cement Plant	On behalf of the equipment manufacturer, analyzed a \$7 million claim by a contractor regarding extra work involving the structural steel installations on a new cement manufacturing plant. The analysis also involved the contractor's claim that it constructively accelerated its work to overcome delays.	Illinois



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Cement Plant	Prepared a detailed evaluation of project costs and schedule, and prepared requests for equitable adjustment against the owner and an equipment supplier relative to the design, procurement, construction and start-up of a cement manufacturing facility. Also provided expert testimony (in arbitration) related to defective design, late and out-of-sequence deliveries, extra work, disruptions to the work, and delayed completion of construction.	Texas
Cement Plant	Assisted the supplier of proprietary equipment in defending against \$20 million claim on a project involving the design, delivery and construction of a new cement production line from ore receiving to clinker storage and loadout. The general contractor claimed for increased costs allegedly due to delays, disruption and labor impact arising from late delivery of design data and proprietary equipment, and a defective design. The case was arbitrated in Texas with client liable for only a portion of disputed extra work.	Texas
Cement Plant	On behalf of the owner, evaluated labor productivity issues and increased costs associated with the construction of a cement plant under a reimbursable contract. Prepared an Expert Report, which facilitated settlement of the dispute.	Texas
CO ₂ Recovery Process Plant	Prepared damages and schedule analyses in support of the owner's defense against a contractor's \$5 million delay and disruption claim on a fast-track CO ₂ recovery process plant facility.	Texas
Condensate Plant	Performed an analysis of an owner's errors and omissions claim against the design contractor on a condensate plant project.	Colorado
Diesel Engine Manufacturing Plant	On behalf of the insurer, evaluated property damage claims associated with flood-damaged industrial buildings and manufacturing facilities following a flood. Prepared comparative cost estimates for the damaged equipment and facilities to test the reasonableness of the damage claims alleged by the owner.	Indiana
Ethanol Plant	On behalf of the design firm, evaluated the technical validity and associated damages associated with alleged defective engineering and equipment design for the Pinal Energy Ethanol Plant Project.	Arizona
Ethanol Plant	On behalf of the owner, analyzed change order claims alleged by the EPC contractor on an Ethanol from corn project at an old brewery site.	New York



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Ethanol Plant	On behalf of the owner, reviewed schedule acceleration and delays associated with the construction of an ethanol plant. Issues involved <i>force majeure</i> , changed site conditions, and defective work by the EPC contractor.	New York
Fiberglass Insulation Plant	On behalf of the owner, evaluated delays and cost overruns on an insulation manufacturing facility in Alberta. Analysis of schedule and cost data in support of the owner's \$28 million counterclaim against the EPC contractor's \$20 million claim. Testified as CPM schedule and cost expert witnesses for the arbitration.	Canada
Food Processing Plant	Represented a general contractor in defending against a \$1 million delay, acceleration and loss of productivity claim on a poultry processing plant. Case was settled during trial with defendant client paying \$150,000.	Alabama
Food Processing Plant	Prepared cost estimates to support a \$5 million insurance claim for food processing building and equipment losses resulting from fire, and provided project management of building stability and safety for examination and documentation of conditions resulting from fire and fire explosion damage. Supported the preparation of detailed CPM schedule analyses. Designated as a construction cost expert in support of the insured's claim.	Georgia
Food Processing Plant	Performed a \$20 million estimate to support a claim for the as-built building cost and replacement cost value resulting from a total loss fire at a poultry processing facility.	Georgia
Food Processing Plant	Prepared a contractor's delay and loss of productivity claim against an owner cooperative on the construction of a \$32 million soybean processing plant. Developed a document database, prepared a detailed schedule analysis, and calculated the contractor's entitlement to delay and loss of productivity damages as a result of the defective design by the process equipment licensor and late delivery of equipment.	South Dakota
Food Processing Plant	Reviewed and analyzed both approved and pending change order costs by a construction manager, for entitlement and reasonability to assist the owner of a food processing facility in Smithfield.	Virginia



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Food Processing Plant	Developed a 1,200-activity master schedule for a new \$98 million sugar beet refinery project. Established the work breakdown structure for the project. With the corporate accounting department, developed the cost code of accounts. Integrated the master schedule activity coding and breakdown with the coding and breakdown created for the job cost system. Prepared graphics and summary schedules for presentation at public and Board of Directors' meetings.	Washington
Glass Bottle Plant	Performed an analysis of a contractor's delay and loss of productivity claim against a Finnish equipment supplier providing a design build materials handling facility for a glass bottle manufacturing plant. Analyzed the contractor's schedules, alleged changes to its scope of work, and cost records supporting its labor cost overruns. The case was resolved in arbitration in favor of the client equipment supplier.	Colorado
Microchip Facility	Prepared an electrical contractor's claim involving engineering delay, errors and omissions resulting in work arounds and construction delays on the installation of Life Safety Systems, and Instrumentation and Control Automation on a Silicone Chip Plant and Cleanroom Facility located in Colorado Springs. Performed a schedule analysis of delay impacts due to engineering rework and added change order work, causing schedule compression and acceleration with trade stacking, over manning of crews with a shortage of qualified labor causing productivity loss due to overtime fatigue, lack of coordinated drawings, late material delivery, and substandard supervisory management and cost controls by the construction manager.	Colorado
Microchip Facility	Provided entitlement and damages analyses on an \$11 million dispute arising from the construction of a semiconductor fabrication facility. Prepared issue analyses related to mechanical and piping design changes and performed estimates on mechanical and piping work to analyze cost overruns.	Maryland
Microchip Facility	On behalf of the construction manager, performed an analysis of a mechanical contractor's contract and quantum meruit claim for disputed changes in scope, delays, and loss of productivity on the installation of piping systems on a computer microchip manufacturing facility. Presented testimony in arbitration.	Virginia



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Nitrogen Plant	Performed an analysis and prepared an Expert Report in support of the owner's entitlement to claims against the EPC contractor involving the standard of care in its management of the design and construction of a nitrogen plant project. Issues involved design life requirements of the plant components, prudent industry practices performance standards, and alleged improper design by the contractor. Prepared an Expert Report and testified in arbitration.	Mexico
Paper Plant	Performed an analysis of a contractor's cost claim for unforeseen conditions for the owner of a paper manufacturing facility.	Texas
Paper Plant	Performed an analysis of a Swedish contractor's delay and disruption claim involving the design and construction of a pulp and paper mill.	Washington
Polyester Chip Facility	Assisted EPC contractor with \$10 million claim against owner for increased costs associated with increased scope of work, project delays and disruption and loss of labor productivity arising from subsequent acceleration on the design, delivery and construction of an additional line for the production of polyester chips for use in manufacture of plastic soda bottles.	South Carolina
Smelters, Furnaces, and Calciners	On behalf of the owner, performed an audit of the EPCM and general contractor's cost records to identify potential billing discrepancies and problems on cost reimbursable contracts for a calciner expansion project.	Canada
Smelters, Furnaces, and Calciners	On behalf of the owner, provided schedule delay analysis, cost analysis, and litigation support of a \$400 million blast furnace and coke oven battery project involving analysis of construction cost and schedule overruns and the adequacy of the engineering design.	Indiana
Smelters, Furnaces, and Calciners	Created an EPC contract and contract exhibits for the owner's use in negotiating the EPC of a \$1 billion aluminum smelter. Recommended clauses to resolve potential inconsistencies, ambiguities, and conflicts. Prepared clauses for cost and schedule control procedures.	Trinidad
Steel Mill	Performed the design/supply and supervision, including managing local subcontracts, and with post-contract control, claims execution, and provision of an advisory role in legal/commercial matters with the client on several Direct Reduction Steel Plants.	Egypt



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Steel Mill	Prepared damages analyses on a dispute on a steel mill expansion project. Responsible for a unit price variance analysis and estimating costs for civil, concrete, mechanical, and electric work.	Illinois
Steel Mill	Performed entitlement and schedule analysis on a \$60 million dispute arising from a steel mill expansion project. Reviewed RFIs, drawing changes, and change orders to identify and apportion schedule impacts.	Oregon

The projects listed above were performed by our consultants in a lead/key expert role for Long International or for other consulting firms.