

Deepwater Horizon (MC 252) Incident Mobile Incident Command Center Plan Approval for Issue Signature Sheet

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Name of Plan: 7777 ;	ENV0005, Solid Waste Management Plan, Mobile Sector, August 25, 2010
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Content owner	Tim Thompson - Planning ENV Regulatory Team Lead

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Mobile Incident Command Center Plan

Document Number ENV 0005
Solid Waste Management Plan,
Mobile Sector
August 25, 2010

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SECTION I INCIDENT BACKGROUND AND PLAN SCOPE

This plan is written at the request of the Incident Commander, the U.S. Coast Guard (USCG) Federal On-Scene Coordinator (FOSC), and the associated State On-Scene Coordinator (SOSC) for Mississippi, Alabama and Florida. It is an updated and extensively revised plan, and is the third Mobile Incident Command (IC)-approved Waste Management Plan.

In response to the Deepwater Horizon rig incident originating in the Mississippi Canyon Block 252 (MC 252) of the Gulf of Mexico, emergency response oil spill cleanup activities are being performed that will result in waste generation, in addition to oil recovery and processing. The anticipated waste generation activities may include: oil skimming, oil collection (e.g., use of absorbents), decontamination of cleanup equipment, shoreline remediation, wildlife rehabilitation, as well as other activities related to oil spill cleanup. These activities will be managed under this Waste Management Plan (WMP).

This WMP outlines the waste management procedures and expectations to support proper waste classification, handling, staging, storage, manifesting, transportation, disposal/recycling of the waste generated from the spill cleanup activities, and potential reuse/recycling opportunities, in the geographical areas under the responsibility of the Mobile Incident Command Center (ICC). This WMP addresses solid waste management; a separate plan will cover the management of liquid waste. The WMP will be implemented in accordance with all applicable local, state and federal laws and regulations.

This plan will be amended as necessary to ensure compliance with applicable laws and regulations. Additional or revised information regarding site-specific waste management activities, procedures, and locations may be provided as revisions to this plan to accommodate the needs of the MC252 response activities. Amendments may occur only upon mutual agreement by BP and federal and state agencies that provided approval of the original plan.

Several entities are involved with implementing this WMP. The roles and contact information are provided below.

Entity	Responsibility	Contact Number
Incident Command Center (ICC)	Development/updates to this WMP	NA
BP Environmental	Waste Management Plan, resources, compliance assurance and oversight	(630) 961-7658
Waste Management (WM)	Providing waste containers, waste handling, transportation, recycle and disposal	Day (251) 583-0804 Night (251) 583-0791
ERM (Environmental Resources Management)	Establish and Manage the Decontamination sites and provide waste tracking and compliance assurance support	<u>(888) 586-9296</u>
CTEH	Waste Sampling and Characterization	(501) 258-0582 (501) 690-5723

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SECTION II REGULATORY AGENCY JURISDICTIONS

The Mobile ICC geographical responsibility includes the states of Mississippi, Alabama and Florida, and the Gulf of Mexico. The regulatory agencies and associated contact information that have jurisdiction within the Mobile ICC geographical responsibility are provided in Table II-A. Every effort will be made to ensure coordination and cooperation with the appropriate federal and state environmental agencies and apprise them of waste management and disposal activities performed as this WMP is implemented. As this WMP is amended to include updated information, potentially including additional management activities, waste staging locations or disposal and recycling facilities, the applicable regulatory contacts will be informed of changes and provided a copy of the revised WMP.

Table II-A: Regulatory Agency Jurisdictions and Point of Contact (POC)

Agency POC	Contact Phone	Email
Alabama (ADEM) Phil Davis	Office: 334-271-7755 Mobile: 334-239-6450	PDD@adem.state.al.us
Florida (FDEP) Mary Jean Yon	Office: 850-245-8697 Mobile: 850-519-7859	Mary.Jean.Yon@dep.state.fl.us
Mississippi (MDEQ) Richard Harrell	Office: 601-961-5343 Mobile: 601-668-0900	Richard_Harrell@deq.state.ms.us
Environmental Protection Agency (EPA, Region 4)	Office: Mobile:	Annicella.Alan@epamail.epa.gov
United States Coast Guard (USCG)	24-hr: 866-448-5816	

Notes:

The entities in Table II-A will be notified in a timely manner if new waste management sites, alternative waste management technologies, or other cleaning solutions are to be used.

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SECTION III WASTE STREAM IDENTIFICATION AND CHARACTERIZATION

The general waste streams that are anticipated from oil spill cleanup activities are described in Table III-a. Estimated generation volume of each reclaimable/recyclable material, recovered oil or cleanup waste type is unknown and will depend on the extent of oil spill impact areas, and containment and collection/cleanup operations. Classification of the recyclable and waste streams will be determined based on generator knowledge and sampling analysis results. All wastes will be characterized in accordance with all requirements of the facilities selected for recycling (primarily oil) or waste disposal, as defined in the facility's permit requirements, and applicable federal and state regulations.

Note: Any material that is located and/or recovered during response operations and that is suspected to be debris or items from the Transocean Deepwater Horizon drill rig or rig personnel will not be designated as waste. This material must be immediately reported to the Transocean Call Center at 1-800-598-3195 in order to provide timely information on location and description of material. Questions may also be directed to the BP Call Center at 1-251-445-3125.

Table III-A: Potential Recycle/Waste Streams and Type

Matrix	Description	Type
Solid	Oil-contaminated material that may include debris, soil, sand, and vegetation collected from the shoreline; solid weathered oil (e.g., tar balls); PPE; disposal equipment; sorbents; etc. Material will be drained of recoverable oil, as practicable [(oil will be collected for potential re-processing or other use (see Liquid))].	Exploration and Production (E&P) and Industrial Waste (solids for disposal); off-spec product; potential for energy recovery, bio-treatment (organics)
	Non-contaminated material that has been recovered from support operations of the cleanup activities, including trash and garbage.	Municipal Waste
	Sharps, syringes, PPE, and other medical-related material generated from operations at wildlife rehabilitation centers.	Medical Waste
	Animal carcasses identified during shoreline cleanup and generated from operations at wildlife rehabilitation centers.	United States Fish and Wildlife Service (USFWS) will be responsible for collecting and disposing of all animal carcasses. Contact the Wildlife Unit (866-557-1401) whenever an animal carcass is encountered. Only trained and licensed contractors are permitted to handle animal carcasses under the direction of the USFWS.
Liquid	Liquids are covered under separate cover in the Liquid Waste Management Plan	

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Matrix	Description	Type
Vessel/tank bottoms	Sludges/solids recovered from oil/water recovery tanks and vessels	Reclaimable/Recyclable Oil/E&P waste
Laboratory Analysis Waste	Offsite laboratory waste from response-related analytical sample analyses	Not generated onsite; de-minimus laboratory waste at offsite labs
Hazardous Waste	Response activities are not anticipated to generate hazardous waste; however, any waste stream not identified in the WMP will be properly characterized for hazardous waste determination	Not anticipated; unknown or suspected hazardous waste not covered under the WMP will be properly characterized for waste determination.
Recyclable materials	Plastic bottles, aluminum cans, scrap metal, glass, cardboard, cleaned non-absorbent boom, etc.	Used materials that can be recycled at licensed/permitted facilities.

Wastes will be managed appropriately from the point of generation until the final disposal or recycle/reuse of the waste. The table below presents the general management of the anticipated waste types from point of generation through the final disposition (i.e. cradle to grave).

Table III-B: Waste Stream “Cradle to Grave” Management

Waste Type	Point of Generation	Contain and Transport	Staging	Disposal
Oil-Contaminated Material	Offshore, inshore, and onshore cleanup activities	Lined containers transported by WM or appropriate designee	Approved WM staging areas	Approved disposal facility (See Appendix B)
Municipal Waste	Any area where personnel associated with the MC 252 Incident are located	Appropriate containers transported by WM or appropriate designee	Approved WM staging areas	Approved disposal facility (See Appendix B)
Medical Waste	Any area where personnel associated with the MC 252 Incident are located	Appropriate containers transported by WM or appropriate designee	Approved WM staging areas	Approved WM disposal facility
Animal Carcass	Offshore, inshore, and onshore cleanup activities	USFWS to appropriately contain and transport	USFWS will stage waste in appropriate areas	Incineration or approved disposal facility
Reclaimable/ Recyclable Oil/E&P Waste	Offshore, inshore, and possibly onshore cleanup activities	Lined containers transported by WM or appropriate designee	Laboratory will manage the disposal of samples material	Appropriate recycling or reclamation facility

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Waste Type	Point of Generation	Contain and Transport	Staging	Disposal
Laboratory Analysis Waste	Sampling location	Laboratory will manage the disposal of sample material		
Hazardous Waste	None anticipated	Appropriate containers, transportation, and disposal in accordance with applicable State and Federal regulations		
Recyclable Materials (non-oil/E&P)	Offshore, inshore, and onshore cleanup activities, IC Center operations, Waste management areas	Appropriate containers transported by <i>WM</i> or appropriate designee	Approved <i>WM</i> staging areas	Appropriate recycling facility

Section III.A. Waste Sampling and Analysis

Although the majority of oil-contaminated waste that is generated from response cleanup action to the MC-252 incident will be classified as E&P exempt from the definition of hazardous waste by federal and state regulatory definition, wastes will also be sampled in order to determine waste characteristics and classifications that can be used by receiving facilities to verify the material meets facility-specific acceptance criteria, and to complete facility-specific Waste Profiles. Sampling and analysis will also provide additional information to response workers and the public regarding the chemical and physical properties of materials that are generated and managed during the response and that may require transportation and disposal.

Samples of off-shore weathered oil and vegetation were first collected and characterized on May 30, 2010. The sampling was conducted in accordance with the IC-approved *Oiled Sargassum Sampling Strategy, Mobile Sector* (May 29, 2010). The following analyses were completed:

- Total/Toxicity Characteristic Leaching Procedure (TCLP) volatile aromatic compounds (VOCs)
SW846 8260C
- Total/TCLP semi-volatile aromatic compounds (SVOCs)
SW846 8270D (8270D SIM for Polycyclic aromatic hydrocarbons (PAHs))
- Total/TCLP Metals
SW846 6000 series
SW846 7471A (mercury)
- Propylene glycol
2-butoxy ethanol
SW846 8015B
- Salinity
SM 2520B

Analytical results confirmed the weathered oil did not exhibit hazardous waste characteristics. In addition, the two chemical markers associated with the dispersant product that was used offshore (propylene glycol, 2-butoxy ethanol) were not detected in the sample.

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Analytical results for this sample, and for all samples that will be collected for waste streams and analyzed for disposal purposes during the MC 252 response, are routinely uploaded to both BP and U.S. EPA external web sites for public access.

On the basis of the initial weathered oil sample results and generator knowledge of crude-contaminated materials that will be generated from emergency response activities, the primary analyses that will be performed on crude oil-contaminated response-related wastes that are generated for disposal include the following:

Analysis	Analytical Method(s)	Data Use
RCRA TCLP: VOCs for benzene	SW846 8260D (solid)	Verify waste classification for disposal; Complete receiving facility Waste Profile
RCRA TCLP: Metals	SW846 6000 series SW846 7471A (mercury-solid)	Verify waste classification for disposal; Complete receiving facility Waste Profile

At a minimum, oil-contaminated debris that is collected for the first time (i.e. a new waste stream), will be sampled and analyzed for the above parameters. Additional laboratory analyses for chemical and physical properties will be performed on specific waste streams, depending on the source of generation, treatment and disposal facility requirements, and use of the data for treatability studies or for testing alternative recovery and reuse technologies.

Information regarding sampling and analysis procedures and quality assurance guidelines are discussed in Section VII.

Section III.B Tar Ball Waste Management, Sampling and Disposal

Because weathered oil in the form of tar balls on a shoreline may be an early indication of impact to land from an offshore crude oil release, a separate document, *Tar Ball Waste Management Sampling and Disposal Plan (Draft)*, was prepared for the MC 252 incident to assist with early shoreline cleanup activities and waste characterization. The plan, included as Appendix H, provides additional detail regarding collection, sampling and analysis, frequency of analysis, management and disposal of tar balls and other solid weathered oil material that is collected from shorelines, from primarily using hand tools and other manual pick up and collection methods.

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SECTION IV WASTE MANAGEMENT APPROACH

The locations where spill cleanup activities may occur include the Gulf Coast and the Gulf of Mexico, and other areas within the Mobile ICC's geographic responsibilities. The waste streams generated during cleanup activities will be collected and routed to pre-determined staging areas that have been approved by the Mobile ICC and applicable federal and state regulatory agencies. The waste will then be segregated, classified, and transported for final disposition to an approved disposal, treatment or recycling facility.

The following preferred hierarchy of waste management will be used, as applicable, during implementation of this WMP:

- Source Reduction ← *Most Preferred*
- Reuse
- Recycling
- Treatment
- Disposal ← *Least Preferred*

Initially, the primary effort will be to collect, contain and remove contaminated materials as quickly as possible. As a result, volumes and logistics may not allow for all potential management options (e.g., reuse/recycling) to be implemented. However, certain materials collected and/or generated as a result of the cleanup may have recovery (e.g., energy recovery) or recycling value. Recovery, reuse or recycling of contaminated and non-contaminated materials will be evaluated and implemented as applicable and practical. As time progresses with spill cleanup activities and understanding of the waste being generated is attained, reuse and recycling of the waste will become more feasible. It is a priority of the IC to implement recycling and reuse for the generated wastes.

The protocols and waste management operations plans for proper waste handling and recovery, staging, tracking, transporting, and final disposition are outlined below. More detailed waste handling and profiling procedures, approved staging and disposal locations, and other waste-stream specific information are provided in Appendix A.

Waste Management (**WM**) has been selected as the primary coordinator for the waste management activities described in this plan. In addition, several support and oversight responsibilities for waste management activities have been delegated to other contractors. The various roles of each of the contractors involved in implementing this WMP are summarized below:

Waste Management (WM):

Day: **251-583-0804**

Day: **251-583-0801**

Night: **251-583-0791** (after 7pm)

- Providing labor, materials, and equipment to contain and transport the waste;
- Segregating, and staging wastes;
- Obtaining profiles at approved disposal facilities, and
- Obtaining data and determining waste classifications.

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Environmental Resources Management (ERM):

Day/night: **251-445-8912**

- Completing waste transportation manifests or bills of lading;
- Signing waste manifests, under BP authorization and designated signature authority; and
- Completing waste tracking documents, including type and volume of waste generated and disposed
- Completing site-specific permits and authorizations for establishing and managing decontamination sites;
- Providing third-party oversight of contractor-operated waste management activities.

Center for Toxicology and Environmental Health (CTEH)

Day/night: **317-473-0688**

- Sampling waste to support characterization and classification. Analysis of samples will be completed by contracted third-party certified laboratories.

Romans Group: Mobile ICC

- Technical assistance for preparing applicable Spill Prevention Control and Countermeasures Plans (SPCC), Storm water Pollution Prevent Plans (SWPPP), Facility Response Plans (FRP) for staging and de-con areas and other permits and authorizations as needed.

To arrange for appropriate recycle/waste transportation and delivery, contact the **WM** single point of contact at **251-583-0804** or **251-583-0801** (day), or **251-583-0791** (after 7pm). **WM** will also coordinate with BP and CTEH personnel for appropriate collection of samples for waste characterization and classification, as needed.

Section IV.A. Handling

In general, solid material generated from oil spill cleanup activities will be handled as follows (more detailed description provided in Appendix A):

- Clean roll-off bins will be stored at designated staging locations. The bins will be lined and transported to the selected area where cleanup activities are occurring as needed.
- Waste will be collected and segregated in appropriate containers that are designated by trained BP (or trained BP-designee) operations personnel in order to segregate oily solid waste from non-oily solid waste. Once filled, the roll-off bins will be covered during transport back to the staging areas. Containers will also be covered during heavy rains in order to minimize rainwater accumulation.
- Upon receipt of the material at the staging areas, the waste will be identified as material for disposal or material for recycling by a trained BP employee or trained BP-designee. The classification will be based on process knowledge (generator knowledge) or analytical results from waste sampling. If analytical samples are required, quick turnaround of analytical data will generally be requested in order to minimize holding time for wastes at staging areas prior to classification and manifesting to receiving facilities.

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- Containers will be designated with regard to waste type either by container labels or locations that are well-signed.
- Once the waste is classified and the container is determined to be full, a manifest or bill of lading (Appendix F) and relevant paperwork will be prepared and reviewed for completeness. The manifest or bill of lading will be signed by BP as generator of the waste or an authorized BP agent (see Appendix G for Waste Manifest Signature Delegation Authority).
- Once approved by the designated **WM** Coordinator, the container will be covered and released for transport to a designated, approved waste disposal or recycling facility (see list of approved facilities in Appendix B).
- Only contracted BP cleanup contractors will be allowed to bring waste to the staging areas. If others attempt to deposit any waste at the staging areas they will be turned away by security personnel.
- Tar balls will be handled in accordance with the Tar Ball Management Plan presented as Appendix H.

Section IV.B. Staging

Strategic staging areas have been identified to support the cleanup operations associated with this incident. The areas are divided by function of the site which includes equipment staging sites, waste staging areas and decontamination (de-con) stations. A potential additional classification of staging site may be beach locations; however, these are not currently listed because their locations will be determined only as needed and with required authorizations and approvals.

Additional staging areas may need to be added for future capacity, as necessary. New staging areas (and recycling/disposal sites) will be added as amendments to the approved waste management plan based on changing conditions of the emergency response. To the extent practicable, waste staging areas are located in existing **WM** business locations. Applicable states are provided information regarding proposed waste staging areas (non-**WM** business locations) and de-con stations for review and concurrence. A list of the staging locations that are currently in place or may be proposed to be located is provided in Appendix C.

BP will comply with all permits and approvals that are required to site and operate temporary staging areas to support the response operations. Consideration for siting will include various location criteria such as presence of wetlands, floodplains, proximity to archeological and historic sites and resources, consideration of local demographics, known threatened and endangered species habitat, logistics to and from the site and availability of the property under consideration.

Each staging area will be equipped with an adequate supply of DOT-approved containers to support forecast cleanup activities. Spill Control and Countermeasures Plans will be developed for any sites subject to 40 CFR 112.1. All **WM** staging areas also have site-specific spill response and notification plans onsite for use by site personnel.

Each staging area will be supported by at least one of the following personnel, and at least one of the personnel will be BP (or designee) or **WM** Waste Coordinator when the site is active and operating:

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- Security personnel: all staging areas will have 24-hour, 7 day a week security personnel on site
- BP personnel (or designated equivalent)
- **WM** Waste Coordinator

At the conclusion of waste staging area use, staging areas will be clean-closed by removing all temporary facilities and equipment, evaluating surface soils for any visible evidence of contamination that resulted from staging activities (followed by remediating impacted soils, if needed), returning the land to original grade as necessary and re-vegetating areas if requested by the landowner.

Section IV.C. Tracking

A data management system will be used to track waste characterization documentation, profiles, waste manifests, and bills of lading. Waste that is collected at each waste staging area is tracked daily by individual state and waste staging area location, and the information is used to update the daily ICS-209 Form. Recyclables are also tracked and documented on a routine basis. (see Appendices D and F for waste manifesting/tracking and ICS-209 forms).

Section IV.D. Transportation

WM has developed a Transportation Plan that mandates that vehicles are operated in a manner that prevents leakage or spillage of waste. A copy of the Transportation Plan is provided in Appendix E.

Section IV.E. Final Disposition

Only licensed or permitted waste management and disposal, re-processing or recycling facilities (with the exception of recycle facilities for common items such as plastic water bottle, aluminum cans, cardboard, etc) that are listed in Appendix B of this WMP will be used. Special arrangements and the required approvals will be obtained for county or municipal disposal facilities (as identified by local and state officials) prior to use, as required. Additional facilities that are approved by BP for potential use will be added to Appendix B as a revision to this WMP.

SECTION V DECONTAMINATION

Onshore decontamination sites will be used to decontaminate personnel, equipment, booms, and other resources, as needed. Offshore decontamination operations will also be conducted during the response. The following IC-approved plans include details regarding de-contamination equipment and procedures, cleaning agents, management of de-con wastewater and health and safety programs in place for the decontamination activities:

- *Decontamination Plan – Boom, Vehicle, Equipment and Personnel – Mississippi Canyon 252 Oil Release (15 May 2010)*
- *Sector Mobile, AL Deep Draft Vessel Evaluation and Cleaning Plan (as amended, 21 May 2010)*

Drivers will conduct visual inspections of empty roll-offs, bins or other equipment being transported from the staging areas to pick-up locations to assure they are free of oil. If necessary, water collected in roll-offs, bins, and other containers located at the staging area will be removed by vacuum truck prior to transportation to pick-up locations. The profiling and transporting requirements outlined in this WMP will be applied when managing the oily

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water and decontamination site waste streams. All management, treatment and disposal of wastes that are generated during decontamination activities will be conducted in compliance with regulatory requirements, this WMP and the receiving facility permits and acceptance criteria.

Besides this plan, each decon site will have available onsite a bound document that includes applicable site-specific documentation such as storm water pollution prevention plans (SWPPP), spill prevention control and countermeasures plans (SPCC), site layout diagrams or design drawings, hurricane preparedness plans, material safety data sheets (MSDSs) and health and safety guidelines.

The Deep Draft de-con plan includes procedures for pre- and post-decontamination operations site sampling to document environmental conditions before and after the sites are used. For land-based de-con sites, due diligence assessments were performed prior to leasing the properties. Similar due diligence assessments will be conducted at the conclusion of de-con activities at each site.

SECTION VI HEALTH AND SAFETY

Health and safety protocols will be administered under each of the entities working under this plan's corporate health and safety programs and project-specific Health and Safety Plans. The ERM health and safety program for project field work to support Mobile ICC response activities are detailed in their *Level 2 Non-Intrusive WARN Health and Safety Plan, GMS Project #0115942*. Site-specific health and safety plans that are applicable to specific waste staging areas and de-con sites have been prepared and are available onsite at the locations.

SECTION VII QUALITY ASSURANCE

Waste management oversight for waste staging area operations will be performed from **WM's** Command Center. Routine call-ins will occur at each staging area to determine waste/recovery volumes, general flow of material, and any other issues that may arise from the operation and management of these Areas as they relate to waste.

WM will perform routine and unscheduled documented inspections to ensure containers are covered when not in use, secondary containment is being used (where appropriate), and that liners are being used. Additionally, third-party oversight personnel (an ERM representative) are stationed at each staging area to ensure the staging areas are managed properly.

Additional information regarding sampling and analysis, quality control and documentation is included in the following MC 252 project plans that are currently final and available for reference or are in progress:

- *Quality Assurance Sampling Plan for British Petroleum Oil Spill* (EPA Region 6/EPA Region 4/EPA Environmental Response Team/EPA ASPECT/Center for Toxicology and Environmental Health, May 2010)
- *Deepwater Horizon (MC-252) Incident Quality Assurance and Data Management Project Plan, Mobile Sector* (DRAFT, May 12, 2010)

SECTION VIII COMMUNITY RELATIONS

BP has a proactive community relations, public information and public outreach program in place throughout the Gulf of Mexico region for the MC 252 emergency response. The

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program is dynamic and adaptable in order to respond to changing conditions during the response. The dissemination of public information regarding response-related waste management activities, including efforts to minimize waste generation, locate waste staging and de-con sites in coordination with state and local governments and residents, and publication of fact sheets, press releases and documents and plans, including this WMP, is included as part of the overall community relations and public information and outreach program.

The principles and concepts for keeping the public informed and for receiving public input during a crisis are described in the National Incident Management System (NIMS), which was originally implemented in 2000 and revised in 2008 to incorporate the lessons learned during Hurricane Katrina. NIMS calls for a collaborative approach among responding agencies, especially during large events that involve multiple local, state, tribal and federal entities, along with non-governmental organizations and the private sector.

Information dissemination from the Mobile sector ICC occurs through two components which support the Unified Command -- the Joint Information Center (JIC) under the direction of the Public Information Officer (PIO), and the Liaison Officer (LO). The PIO is responsible for providing information to the media. The LO is responsible for providing information to agencies, tribes, office holders and other government entities. The PIO and LO share the responsibility for communicating with the public in general.

The primary responsibilities of the Mobile JIC are to gather, package and distribute information, inform the public through the media, anticipate questions, analyze news coverage, and coordinate with the Liaison Office. The responsibilities of the Liaison Office are to provide information to government agencies and community organizations, stay in touch with public concerns and analyze public reaction, provide context on the local economy and culture, and coordinate with the JIC.

Federal and state agencies often develop their own manuals that outline the roles, responsibilities and tasks for various positions in the JIC. For oil spills such as the MC 252 over which the USCG has authority, the NRT (National Response Team) Joint Information Center Model (January 2010) complies with NIMS and provides the structure for communication.

Below are the dissemination tools most frequently used by the Mobile PIO:

- Press releases and fact sheets
- Press conferences
- Websites
- Video and photos
- Press tours
- Frequently asked questions
- Social media like Facebook and Twitter

Although not specifically covered in most JIC manuals, below are the tools for the Mobile LO:

- Community meetings and open houses
- Community bulletin board
- Information centers
- A "hot line"

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- Door-to-door contacts
- Presentations to community groups
- Websites
- Translation services

The Community Outreach section for the Mobile JIC has been established in the three states and 13 counties that comprise the Mobile sector. Each county is staffed with a team of individuals dedicated to building relationships with stakeholders in the community, including commercial fisherman organizations and local business groups; keeping local elected officials and media informed; and monitoring local issues and addressing them, as appropriate. Community Outreach is part of the Liaison Section of the Unified Command/Mobile. A management team at the Mobile ICC provides full support to staff in the field.

WM implements a corporate-endorsed written community relations plan at each of the permitted WM disposal facilities that are listed in this WMP as potential receiving facilities for response-related waste. The community relations plans include public outreach efforts and events, public participation strategies, and commitments for company involvement and assistance with local residents and organizations.

This WMP provides direction to waste staging area and de-con station personnel for interactions with members of the public or stakeholder groups during waste management and decontamination activities. For typical engagement with stakeholders the following guidance is provided:

Internal Mission

- Primary concern is the health and safety of the community, workers and environment.

Stakeholder Engagement

- Request the nature of the stakeholders business
- Be polite and courteous
- Ask for their name and contact number
- Provide the stakeholder a laminated "Public Outreach Information Card". A supply of the cards will be provided to personnel at the waste staging facilities. Information provided on the card is shown below.

Environmental/Community Hotline – to report oil on the beach or shoreline or other environmental or community impacts - **866-448-5816**

Wildlife Hotline – to report and access care for impacted, i.e., oiled wildlife - **866-557-1401**

Volunteers – to request volunteer information - **866-448-5816**

Joint Information – for media and government inquiries - **985-902-5231/985-902-5240**

Services – to register as consultant, contractor, vendor, or submit information on alternative response technology, services, products, etc. - **281-366-5511**

Vessels of Opportunity – to report and register boats available to assist with response – **281-366-5511**

Solid Waste Management Plan

Claims Information – 800-440-0858

To the extent feasible, BP shall consider the impacts on minority and low income populations when selecting future staging areas. BP will demonstrate a strong commitment to address environmental justice challenges and the disproportionate environmental burdens placed on low-income and minority communities as required by applicable legal requirements.

Solid Waste Management Plan

Appendix A

1 Waste Management Best Management Practices – Solids

Best Management Practices (BMP) and guidelines for the staging and routing sites that will ensure proper handling and disposal of waste include:

1. Preparation of bins: lining (for oil-contaminated waste), documentation
 - a. Each container:
 - i. will be identified with a clearly visible, unique numeric or alphanumeric code.
 - ii. will be lined prior to placing any contaminated material into it, to aid in the prevention of spills
2. Prevention of continued contamination: protection from storm water runoff
 - a. The following best management practice will be implemented at each staging and routing site:
 - i. All open top containers will have plastic liners; in addition, containers should also be covered to prevent water accumulation during heavy rain events.
 - ii. During transportation all loaded containers will be tarped utilizing the truck's mechanical tarping system, roll tarp or box cover.
 - iii. Containers will be routinely inspected at the staging areas to assure proper containment of waste.
 - iv. Any damaged containers and liners will be identified and removed from service for required repair prior to returning to service.
 - v. In the event leakage does occur, the following will take place:
 1. Source of leak will be determined and corrected utilizing a visual inspection.
 2. Utilize standard spill cleanup materials and equipment (shovel and absorbents).
 3. Any remaining impacted soil will be excavated, containerized and properly disposed.
 - b. Contaminated containers that could cause impact to the environment; e.g., oil residue on the outside of the container, will be manually cleaned with sorbents or will be transferred to a decontamination station for decontamination.
3. Manifesting/documentation: from cleanup area to staging & routing to disposal site
 - a. **WM Rep** receives call from Trash/Waste collection area and "starts" a new log entry on "Full Container Log" in the **WM** SharePoint server.
 - b. **WM Rep** asks caller for information, and logs the following for each new order:
 - i. Date and time request came in
 - ii. Last name of **WM Rep** taking order
 - iii. Company name of requester
 - iv. Name and BP badge number (if applicable) of contactor requesting service

Solid Waste Management Plan

- v. Phone number of requester
- vi. Name of beach/location (efforts will be made to use geographic coordinates when possible)
- vii. Applicable Staging Area
- viii. Container ID number (identification of the container)
- ix. 3rd party or **WM**-owned container
- x. If 3rd party container, company name and address of where box needs to be returned
- xi. Service requested – either pick up full only and do not replace with an empty (i.e. “DNR” pulldown), or swap (i.e., “Swap” pulldown)
- xii. Description of waste

NOTE: The description of the waste is required to determine the type of equipment for the job.

- c. Once ALL of these **REQUIRED** fields are populated, the **WM** Rep will select “OK” in Share Point, and a “Shipment ID number” will be automatically assigned.
- d. **WM** - Command Center Rep will provide the caller with that Shipment ID number (sequence of order) for future reference.
- e. Based on information above, **WM** Rep populates the following four fields:
 - i. Waste Management Method
 - ii. Disposal Facility
 - iii. Whether Disposal Facility is **WM** or 3rd Party
 - iv. Profile number
- f. Staging Area Manager (SAM) / Staging Area Administrator (SAA) reviews **WM** SharePoint data records for any new orders.
 - i. SAM locates the “Shipment ID Number” on the Full Container Log, and selects driver to perform service.
 - ii. SAA populates the record as follows:
 - a. Shuttle Carrier company name for Service Requested
 - b. Date/time shuttle left Staging Area for Service Requested
 - c. SAM/SAA prints full container log entry as haul ticket
- g. Shuttle truck goes to beach/location to drop off empty container (if a swap) and/or pick up full container (making sure to verify the container number before picking it up). If full box cannot be located, driver will refer to the Routing Slip for the requester’s name and phone number to obtain further directions.

The driver will inspect the area prior to removing the container for any environmental impact. If any impact is noted the driver will notify the **WM** command center to report the occurrence. **WM** will initiate a response as appropriate and also complete required notifications to regulatory agencies.

- h. When the driver arrives with a full container at the Staging Area:
 - i. SAA locates the container number on Shipment Log, and pulls up associated Shipment Record.
 - ii. SAA enters the date/time that the full container arrived at the Staging Area in Shipment (full container) Log
 - 1. If the Log shows that this is a 3rd party container:
 - a. SAM must verify that contents of the bin matches the log “waste description”.

Solid Waste Management Plan

- b. SAM contacts WM Rep (WM – BP Command Center) to obtain approval to move the 3rd party-owned container (*Note, these 3rd party containers will be moved by same WM driver, after being dumped, to the 3rd-party laydown yard address that BP Command Center populated on log*).
 - c. WM service representative will email BP Environmental Waste Rep at the BP command center for approval and report back to SAM when approval has been received to move the container.
 - d. Once BP Command Center calls back to say BP has approved pickup, SAA pulls down “yes” in “Was movement of 3rd Party Container approved by BP” field.
- iii. SAM obtains a driver to pull full container to disposal facility.
 - iv. SAA selects a new pre-printed manifest and enters the following (or makes certain that all of the following information is already contained on it):
 1. Shipment ID number
 2. Staging Area and Beach/Location Information
 3. Management Method
 4. Profile number
 5. Disposal Facility
 6. Unique Manifest number (should be pre-printed)
 7. Size of Container (in CY)
 8. Container ID number
 9. Generator signature block (BP or ERM [environmental consultant authorized to sign manifest on behalf of BP] representative, located at each staging area, will sign)
 10. Carrier company name
 11. Driver name
 12. Truck Identifier (Truck Number)
 13. Whether it is a 3rd party-owned container.
 14. Address of where to return 3rd party (empty) container (after dumping)
 15. Time of departure to disposal facility
 - v. SAM/SAA gives driver the completed manifest; driver signs and dates it (as “transporter”).
 - vi. SAM/SAA prints full container log entry as haul ticket
 - vii. BP or ERM representative will sign manifest at the staging area and hand back to driver.
 - viii. SAA keeps blue (signed by ERM and Driver) copy. This copy will be mailed to National Accounts Sales and Services (NASS) Program Manager for BP).
 - ix. BP or ERM retains gold copy of the manifest for recordkeeping.
 - x. Driver departs for disposal facility with load and completed/signed manifest.
 - xi. SAA completes the Shipment Line item in data record for this container with the following information (found on their copy of manifest):
 1. SAM's last name
 2. Manifest number
 3. Size of container (CY)

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4. Carrier company name
 5. Driver's last name
 6. Truck Identifier (Truck number)
 7. Date/Time truck left to deliver waste to disposal facility
 8. Load was rejected at Landfill and Returned to Staging Area – pull-down "No"
- xii. If load is subsequently rejected at landfill and returns to Staging Area for any reason (e.g. incorrect Profile, arrived after operating hours, or comes up hazardous), SAA will change "No" dropdown to "Yes" dropdown for data field "Load was rejected at Landfill and Returned to Staging Area", and an explanation inserted into "Comments" field (last field in the Record). Then, for these loads:
 1. If load will still be going to landfill (e.g., next day when gate opens again), SAA will modify information populated in item ix. for that same Shipment ID when load departs for landfill again.
 2. If re-routing to alternate disposal facility is necessary, SAA will enter "NA" in all of the subsequent fields up to the "Order Closed" field, and pull down "yes". At that point, SAM notifies Command Center to begin new order in "Full Container Log".
 - xiii. WM submits the "Daily Shipment Log" electronically to ERM, ERM submits to BP on a daily basis.
 - xiv. The Situation Unit completes form ICS-209 from the data presented by ERM.
- i. Disposal Site Steps:
 - i. Driver arrives with load.
 - ii. Destruction/Disposal Facility Receiver signs and dates manifest (as "facility").
 - iii. Load is weighed and info loaded into FastLane (for WM facilities).
 - iv. Destruction/Disposal Facility will generate copy of weight ticket and signed manifest (and any other paperwork which denotes any additional services required, such as solidification, etc.) and forwards to WM Command Center.
 - v. All manifests and other documentation will be sent to BP electronically and/or mailed to the address identified on the manifest.
4. Site storage restrictions: no storage at staging/routing sites or cleanup sites
- a. No containers loaded with crude oil contaminated material will be stored at any location other than the BP-approved WM staging site.
 - b. Containers loaded with crude oil contaminated debris will not be stored at any BP-approved WM staging site longer than 72 hours, with the following exceptions:
 - i. Oil contaminated material may be stored at the WM Pecan Grove Staging Area for up to 45 days in accordance with the provisions provided in Appendix J; the 45-day storage period is intended to allow time to implement and schedule recycling/reuse as an alternative to landfill disposal.

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- ii. The authorizations for certain staging sites (Pensacola and Panama City are examples) specify staging durations shorter than 72 hours. In any instance where a site-specific authorization specifies a staging duration shorter than 72 hours, the site specific staging duration applies.
- c. Each operational BP-approved WM staging site will have 24-hour manned security.

Solid Waste Management Plan

Appendix B

BP-Approved and Other Potential Solid Management and Disposal Facilities

Landfill Sites (Solids)

Location Name	Address
WM Pecan Grove Landfill	9685 Firetower Road, Pass Christian, MS 39571
WM Chemical Waste Management - Lake Charles	7170 John Brannon Road, Sulphur, LA 70665
WM Chastang Landfill	17045 Highway 43, Mount Vernon, AL 36560
WM Springhill Regional Landfill	4945 Hwy 273, Campbelton, FL 32426
Republic Svcs. Colonial Landfill	5328 Hwy 70, Sorrento, LA 70778
Baldwin County Magnolia Landfill	15140 County Rd. 49, Summerdale, AL 36580
Emelle Landfill, Chemical Waste Management	36964 Al Highway 17, Emelle, AL 35459-2300
WM Plantation Oaks Landfill	35 Shiledboro Rd, Sibley, MS 39165
WM Clearview Landfill	2253 Mudline Rd. Pelahatchie, MS 39092
WM Central Landfill	8800 Highway 11 North Mc Neill, MS 39457

Proposed Recycling/Reuse Facilities

Location Name	Address
Alabama Hot Mix (Roads, Inc. of NWF)	17751 Vaughn St, Summerdale, AL
Materials Recovery Corp	1804 Eighth St. Mobile, AL
The Newark Group	1750 9th Street, Mobile, AL
Mitchell Container Services, Inc.	226 Hwy 43 South, Saraland, AL
Environmental Technologies of AL	8390 Segers Road, Madison, AL
Aluminum Scrap Metal, Inc.	701 N Joachim St, Mobile, AL
Southern Recycling	114 Industrial Canal Road E Mobile, AL 36603
Covanta (Okahumpka, FL)	3830 Rogers Industrial Park Okahumpka, FL 34762
Covanta (Tulsa, OK)	2122 South Yukon Avenue, Tulsa, OK 74107-2701
Holcim (US) Inc./Geocycle	3051 Hamilton Boulevard, Theodore, AL 36582-9313
WM Wheelabrator (North Broward, FL)	2600 NW 48th Street, Pompano Beach, FL

As needed other properly permitted facilities may be added to this list. Each facility will be reviewed by BP and contractor to assure that they have the appropriate permits to receive the recovered waste for disposal or reuse/recycle. Any new waste management alternative technologies will also follow this auditing process. The Mobile Joint IC will be notified when any new alternative technologies or disposal/ recycle/reuse sites are identified for use.

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Appendix C

List of Established and Proposed Waste Staging Areas

BP Managed Areas

Location Name	Address
Panama City	1617 Moylan Dr, Panama City Beach, FL 32407
Bayou Chico	700 Myrick Street, Pensacola, FL
NAS Pensacola - (Transitioning Staging to Bayou Chico)	Blue Angel Pwky (Dock), Pensacola Naval Air Station, FL
City Marina Battery Park Boat Landing	Intersection of A Avenue and Water Street, Mobile, AL
Port St. Joe	1624 Grouper, Port St. Joe, FL 32456
Allen's Dockside Marina	292 Graham Drive, Carrabelle, FL 32322
Tallahassee DC	4755 Capital Circle NW, Tallahassee, FL (Capital Circle Commerce Park)
Spud Barge	Will be physically located on the water near Allen's Dockside Marina
Panama City Marina	1 Harrison Avenue, Panama City, FL
USCG Station Destin	200 Miracle Strip Pwky. Destin, FL 32540
Perdido Pass at Orange Beach (Old Outcast Marina)	27555 Larry C Kerry Lane, Orange Beach, AL
Fort Morgan (Gulf Shores Marina)	1577 Highway 180, Gulf Shores, AL 36542
Mobile DC	2455 Michigan Ave, Mobile, AL 36615
Mobile IC	1087 Downtowner Blvd, Mobile, AL
Theodore Industrial Park (Patriot)	2460 Claudia Lane, Theodore, AL 36582
Dauphin Island - Staging	1115 to 1127 Desoto Ave, Dauphin Island, AL 36528
Dauphin Island - Command	421 Albright Drive, Dauphin Island, AL 36528
Bayou La Batre	14805 State Docks Rd, Bayou La Batre, AL
Pascagoula	2210 Petit Bois, Pascagoula, MS 39581
Point Clear Boat Ramp	3134 Graveline Road, Gautier, MS 39553
Point Cadete Marina (Tied to Biloxi Small Craft Harbor)	119 Beach Blvd, Biloxi, MS 39533
Biloxi (de-con)	108 8th Street, Biloxi, MS
Biloxi Small Craft Harbor (Tied to Point Cadete)	679 Beach Blvd, Biloxi, MS 39530
Biloxi DC	13032 Hwy 67 N, Biloxi, MS 39532
Biloxi IC	13061 Hwy 67 N, Biloxi, MS 39532
Gulfport Boat Ramp - public	3215 West Beach Blvd, Gulfport, MS
Pass Christian Harbor	106 Market Street, Pass Christian, MS.
Bay St. Louis (Bayou Caddiy)	5200 Shipyard Road, Bay St. Louis, MS 39520
Stennis Airport	7250 Stennis Airport Road, Kiln, MS 39556
*Others TBD as needed	

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WM Managed Waste Staging Areas*

Location Name	Address
Pecan Grove Staging Area- WM	9685 Firetower Road, Pass Christian, MS 39571
Pascagoula Staging Area - WM	2210 Petit Bois Avenue, Pascagoula, MS 39581
Theodore Staging Area - WM	4770 Hamilton Blvd., Theodore, AL 36582
Foley Staging Area - WM	18110 Eureka Drive, Foley, AL 36535
Pensacola Staging Area - WM	2023 Longleaf Drive, Pensacola, FL 32505
Panama City Staging Area - WM	4217 Cato Road, Panama City Beach, FL 32404
Theodore Dock	Claudia Lane, Port of Theodore, Theodore AL
Fort Walton	630 Martin Luther King Boulevard, Fort Walton Beach, FL., 32548
*Others TBD as needed	

Decontamination Station Areas*

Location Name	Address
Bayou Chico	700 Myrick Street, Pensacola, FL (closed)
Biloxi	108 8th Street, Biloxi, MS
Theodore Industrial Park	2879 Claudia Lane, Theodore, AL 36582
Port St. Joe	Industrial Road, Port St. Joe, FL
Pascagoula	2601 Front St, Pascagoula, MS 39530
Yates Construction (Biloxi)	End of Michael Blvd, Biloxi, MS 39530
*Others TBD as needed	

Maps are maintained (Incident MC252 Deployment and staging) for the BP Mobile IC sector. Additional staging areas will be added to these maps for communication and approval by the Mobile Joint IC.

Solid Waste Management Plan

Appendix E Transportation Plan

1. INTRODUCTION

As part of the response to the Deepwater Horizon incident originating in Mississippi Canyon Block 252 (MC 252) of the Gulf of Mexico, oil spill cleanup activities are being performed that will result in waste generation and subsequent transportation requirements related to these activities. Anticipated wastes requiring transportation include liquids from oil skimming activities liquid decontamination activity waste, and solids from shoreline remediation (e.g. oily debris, damaged booms, absorbents), etc.

This Transportation Plan has been prepared to address the waste transport related materials that will be generated as part of the Waste Management Plan (WMP). All transportation and disposal activities will be performed in accordance with all applicable federal, state, local laws, regulations, and ordinances. Additional standard operating guidelines for vehicle operations related to pre-trip, in-route transportation and post trip activity can found in Waste Management (*WM*) Standard Operating Guidelines for Fleet & Transportation, (available on request from *WM*).

2. WASTE STAGING ACTIVITIES

Strategic staging areas have been identified to support the cleanup operations associated with this incident. The areas are divided by function of the site which includes equipment staging sites and decontamination stations. A third classification of staging site are beach locations but are not listed since those locations will be determined as needed. Also BP and WM reserve the right to add additional staging areas, as needed, in coordination with the applicable federal and state agencies. A list of the staging locations are provided in Appendix D.

3. TRUCK LOADING OPERATIONS

Trucks will be loaded in a designated portion of the staging area as directed by the Staging Area Manager (SAM). Prior to loading of solids, the driver will perform a circle check of the equipment to assure that no contamination is on the outside of the container and appropriate tarps are available if required. In most instances, the solids will be transported in roll-off type containers. Drivers should be aware of the potential for free liquids and appropriate actions should be taken to ensure compliance with receiving facilities' requirements.

4. WASTE PROFILE

All waste that has been generated from activities related to MC 252 operations will require proper classification and profiling into BP-approved, designated facilities prior to shipment so as to avoid delay during offloading procedures. Profiles will be completed on the basis of generator knowledge of the waste and/or Material Safety Data Sheet (MSDS), analytical data or other documentation. WM will work to secure waste material profiles that are generic in nature so that logistical operations will not be impeded. Trucks should not be dispatched unless approved profiles are in place for the proposed destination facility.

5. SHIPMENT DOCUMENTATION

Waste from the emergency response cleanup activity will likely be profiled as non-hazardous waste in most instances, and a proper shipping document (manifest) will be provided to the hauler, which will be used to document and accompany each truck shipment. At a minimum, the shipping document will include the following information:

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- Name and Address of Waste Generation staging area
- Name and Address of Waste Transporter
- Name and Address of Disposal Facility
- Description of the Waste
- Quantity of Waste Shipped (may be estimated in weight or volume at generation site; however, verified quantity at receiving facility is expected in weight)

A copy of the shipping document for each truckload will be retained at **WM** of Alabama-Mobile Hauling Office in Theodore, Alabama, until the MC 252 response is complete, or the staging area is clean-closed, whichever occurs first. All records will be returned to BP at the conclusion of the project or at BP's request. If any waste is suspected to be potentially hazardous waste, sampling for waste characterization and proper waste classification and management will be completed.

6. REQUIREMENTS OF TRANSPORTERS

WM will provide company drivers or hire qualified transporters to haul the waste materials to the appropriate staging area and disposal facility. The selected transporters will be fully licensed and insured at state and federal levels, as needed, to haul the waste material.

7. TRAFFIC CONTROL PROCEDURES

Solids for disposal will be transported in covered roll-off bins or appropriate end dump trailers to the designated disposal facility. As much as possible, trucks will be staged on-site to avoid impacts on the local streets. WM will work to adhere to local conditions and restrictions as required by local ordinance.

While at staging areas, vehicles will be required to maintain slow speeds (i.e., less than five miles per hour) for safety purposes and for dust control.

8. TRANSPORTATION ROUTES

Transportation of waste materials will be on arterial streets and/or freeways, approved for truck traffic, to minimize any potential impact on the local neighborhood and community. WM will work with local officials to identify the routes vehicles will take so as to minimize impact to local communities and activities. Drop-off/Pick-up locations for waste collection containers are planned for road-accessible locations.

9. OFF-SITE LAND DISPOSAL FACILITIES

Based the waste disposal needs, predetermined waste profiles have been established at facilities that are expected to receive waste from activities related to MC 252 activities. Final determination of the selected disposal facility will be based on waste type (solids or liquids), BP-approval status and availability for processing or disposal. Attachment C lists approved disposal facilities and will be updated as required, and as directed by BP.

10. RECORDKEEPING

ERM will be responsible for maintaining documentation for materials that are received and removed at staging areas and de-contamination stations, including "clean de-con" certifications for decontaminated materials, equipment and vehicles/vessels. ERM also maintains an electronic database of waste manifests and waste tracking information.

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11. HEALTH AND SAFETY


Drivers and support personnel will adhere to the site-specific health and safety plan (HASP) that has been prepared for staging areas, collection points or disposal facilities. All personnel working at these sites will be required to be familiar with the HASP.

12. CONTINGENCY PLAN

Each waste hauler is required to have a contingency plan prepared for emergency situations (vehicle breakdown, accident, waste spill, waste leak, fire, explosion, etc.) during transportation of waste material from the Site or designated staging areas to the designated disposal facility. Once the waste hauler is selected, a copy of its contingency plan will be kept on file by WM or approved designee. Each driver will be provided with an emergency response phone number.

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Appendix F Example Non-Hazardous Manifest




#WM 443
N- 1 05

BP America P d t n Comp y
501 ESTAKE PARK BL D Houston TX 77079


B A ERCA
RECON / FILTRATION
AREA 1 FEAL MOBILE
TREATED WELN WATER
5400 GALLONS


P

7455 Rangeline Rd , Theodore, AL 36582
P g

 Agent of 3 6/23/10 8:30 A.M.

BY NS F/E
LP TO Y
PO BOX 1663 L K Charles, LD 70602 5560
FIVE 307

 23/10 0

 6/23/10 0900
D nd T

Solid Waste Management Plan

Appendix G Waste Manifest Signature Delegation Authority

May 11, 2010

Mr. David Sweeten
BP America Production Company
501 Westlake Park Boulevard, 20.106B
Houston, Texas 77079

Project No. 0115942

Subject: Appointment of Agent

Dear Mr. Sweeten:

This letter sets forth our understanding with respect to the execution by Environmental Resources Management ("ERM"), as agent for, and on behalf of BP America Inc. and its affiliates ("Client"), of bills of lading, profiles, manifest documents or related documents relating to transportation and disposal of materials subject to government regulation, including, without limitation, waste and hazardous waste ("Materials") to be removed from sites related to response activities for the Mississippi Canyon Block 252 incident in Alabama, Florida and Mississippi (the "Sites").

As Materials are removed from the Sites, ERM understands that Client will not always have an authorized representative present to execute the documents referred to above. Accordingly, upon execution by Client of this letter, ERM will assist Client in this undertaking by executing such Documents as Client's agent, through ERM's individual on-site representatives. Client will select transportation and disposal vendors. ERM will not be a party to any contracts for transportation or disposition of Materials. Under no circumstances shall ERM be deemed to be the generator of, or to have manifested or arranged for the transportation or disposal of, any Materials.

By executing this letter, Client, as principal, authorizes and appoints ERM as its agent for the sole purpose of executing, as Client's agent, bills of lading, profiles, manifest documents or related documents relating to transportation and disposal of Materials to be removed from the Sites and agrees to indemnify, defend and hold harmless ERM and its officers, directors and employees from any actual or alleged liability, loss, damage, fine, penalty, cost or expense (including reasonable attorney fees) arising out of or connected with any acts undertaken by ERM and its above designated employees within the scope of the agency granted herein by Client to ERM, including, without limitation, any liability derived from any so-called state or federal "Superfund" law.

Environmental
Resources
Management

15810 Park Ten Place
Suite 300
Houston, Texas 77084-
5140
(281) 600-1000
(281) 600-1001 (fax)



Solid Waste Management Plan

May 10, 2010
Mr. David Sweeten
Page 2

Please indicate your acceptance of the foregoing by signing and returning to me the enclosed copy of this letter. Upon your acceptance, this letter shall constitute a binding contract between the parties with no further consideration other than the mutual promises herein contained.

Very truly yours,

Agreed and Accepted:

Environmental Resources Management

BP America Production Company

By: 

By: 

Title: Attorney in fact

Principal

Date: May 11, 2010

MWA/jan

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Solid Waste Management Plan

APPENDIX H

Tar Ball Waste Management, Sampling and Disposal Plan

Purpose

This plan documents the standard procedures that BP and its contractors will use to manage the sampling and disposal of weathered oil tar ball or oiled beach materials (henceforth called tar balls) generated during the Deepwater Horizon Oil Spill (MC-252) cleanup activities in the Mobile Sector. Tar balls are typically highly weathered oil that has disintegrated into small lumps, which can eventually be transported from an offshore source to shorelines and beaches. They may be the first visual indication of oil reaching a shoreline from a distant offshore source. Tar balls come in many forms, shapes and textures and are found in a variety of colors. For purposes of this plan, the term "tar ball" is applicable to non-liquid beached weathered oil that is manually collected during shoreline cleanup activities.

The data collected from the analysis of the tar ball material will be used to verify that this material is non-hazardous waste and acceptable for disposal in local approved and permitted disposal facilities (landfills). It was initially assumed that the weathered tar material will not be suitable for recycling or other treatment and reuse. Disposal was to be the suitable option. However, BP is now exploring other non-disposal management options, such as supplemental use for energy recovery or road material.

The goal is to greatly reduce or eliminate the amount of sand picked up with the tar balls. Field crews must now use screening techniques to minimize the amount of sand collected when the tar balls are collected.

Another goal is reducing or eliminating the use of plastic bags. Tar balls in plastic bags are a hindrance to removing tar balls later for reuse, recycling or biological remediation.

Procedure

Prior to collecting tar balls (or other response-generated oily organic beach cleanup material), BP representatives will contact Waste Management (*WM*) Command Center to request delivery of a lined and roll-top covered container road tarp box (container). *WM* will deliver and position the container at a road-accessible nearby location and record the container delivery and location as a BP staging area for tracking purposes. Several BP staging areas are currently pre-established; additional locations will be established as needed.

- Tar balls will be collected in containers with a removable, reusable plastic liner or clear plastic bags (approximately 4 mil or stronger), or other suitable containers which can be obtained from BP staging locations. Any liners may be reused during the day, if not excessively oiled, and then segregated for proper disposal apart from the tar balls.
- Each container or plastic bag may be filled to approximately 20-30 pounds.
 - Note: Filled containers or bags should not contain free liquids. If liquids are observed, sorbent material should be added to absorb liquids, or liquids should be decanted off and contained for liquids management.
- The tar balls will be delivered in containers or bags to the BP Staging Area.
- The tar balls will be accepted by a BP representative, logged in and placed in *WM* container.
- Once the container is full the BP representative will contact the *WM* Command Center to arrange for pick-up of the container and completed log sheet.

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WM will pick up and transport the container to a **WM** Waste Staging Area and arrange for disposal of the material. Transportation, management and disposal of response-generated oily waste material are discussed in further detail in the *MC-252 Incident Waste Management/Disposal Plan, Mobile Sector*.

Local Maintenance Crews

City or state run maintenance crews who routinely clean the beaches are encouraged to avoid combining free or sticky tar balls with other wastes collected on the beaches. Maintenance crews who have accumulated tar balls may contact the **Environmental/Community number at (866) 448-5816**, who will contact **WM** and arrange for proper disposal of the material.

Security Precautions at Waste Storage Areas

Tar balls collected by BP or its contractors will be stored at a BP or **WM** managed staging area prior to disposal. **WM** has been contracted by BP to manage, transport and dispose of waste materials generated by the MC-252 cleanup activities in the Mobile Sector. Each staging area has a full time Staging Manager and is secured by various combinations of fencing, lights, and local security services.

Tar Ball Waste Characterization Sampling at Waste Storage (Staging) Areas

WM will notify BP and Center for Toxicology and Environmental Health (CTEH), which provides BP-contracted sampling personnel, when the first load of tar balls/beached oil is collected at each established **WM** waste staging area. The objective is to collect and analyze a representative sample of tar balls that initially accumulate at each staging for verification waste characterization sampling. The CTEH sampler will collect a representative sample of the material and submit for laboratory analysis for the following parameters (see Table 1), at a minimum, in order to verify that the material is suitable for disposal as non-hazardous waste and meets facility acceptance criteria at the pre-designated disposal facilities:

- RCRA Toxicity Characteristic Leaching Procedure (TCLP) volatiles (VOCs) for benzene
- RCRA TCLP metals

WM will hold the material on-site pending the results of laboratory analyses. Laboratory analyses will be requested on quick turnaround basis for each initial sampling at the **WM** staging areas. CTEH will forward analytical results to BP waste management specialists for review. BP will contact **WM** to confirm disposal requirements and provide analytical reports to support applicable waste profiles. The *MC-252 Incident Waste Management Plan, Mobile Sector* contains additional detail regarding **WM** waste transporting, onsite management and disposal, including final disposal facilities.

Following the initial sampling for each of the **WM** landfill waste profiles, periodic random sampling (approximately once a month) of tar balls/beached oil that is collected during shoreline cleanup and destined for a **WM** landfill for disposal will be completed in order to provide additional verification for waste profiles.

Solid Waste Management Plan

Analysis and Method	Recommended Container	Preservative	Holding Time
TCLP VOCs (benzene) SW 846 8260D (solids)	8 oz. wide mouth jar	Cool to $\leq 4^{\circ}\text{C}$ in field	TCLP extract: within 14 days, analyze within 28 days
TCLP Metals SW846 6000 series 7471 Mercury (solid)	Liquid: 1000 mL plastic Solid: 8 oz-wide mouth jar	Cool to $\leq 4^{\circ}\text{C}$	Extract within 180 days except mercury (28 days) Prep and analysis of TCLP extract within 180 days except mercury (28 days)

Solid Waste Management Plan

APPENDIX I Air Sampling Plan

This plan addresses air monitoring in the areas near Waste Management sites. Thus, the purpose of this sampling includes the following:

- Monitor the air around the Waste Management sites;
- Monitor in the community to protect the general public; and,
- Monitor specific activities as needed to support safe operations.

1.0 Real-Time Monitoring

Real-time air monitoring for volatile organic compounds (VOCs) will be performed along the gulf, including the areas near staging and decontamination sites and Waste Management designated sites. Real-time air monitoring will be performed using the MultiRAE Plus, UltraRAE, and Gastec colorimetric detector tubes. The MultiRAE Plus will be set up to monitor for volatile organic compounds (VOCs) using a photoionization detector (PID) and hydrogen sulfide using an electrochemical sensor. Real-time air monitoring may also be performed for benzene using the UltraRAE benzene specific PID or Gastec colorimetric tubes. Benzene is not anticipated as a significant constituent. However; concerns have been raised and periodic monitoring is being conducted to address this concern. The PIDs will be used to detect volatile components emitted from the crude oil. Detector tubes and the UltraRAE will be used for periodic chemical specific analysis, and in the event that elevated VOCs are detected using a PID. In addition to chemical monitoring, real-time particulate matter (PM_{2.5}) monitoring will be conducted during in situ burning and at other times, if warranted, using either a TSI AM510 or TSI DRX 8534. The air monitoring equipment being used is listed in the table below.

Real-Time Air Monitoring Equipment

Instrument	Chemical	Detection Limit
MultiRAE	VOCs	0.1 ppm
MultiRAE	H ₂ S	1 ppm
UltraRAE	Benzene	0.1 ppm (0.05 ppm with correction factor)
Gastec	Hydrogen sulfide	0.1 ppm
Gastec	Sulfur dioxide	0.01 ppm
Gastec	Benzene	0.05 ppm
TSI AM510	Particulate Matter (PM _{2.5})	0.001 mg/m ₃
TSI DRX 8534	Particulate Matter (PM _{2.5})	0.001 mg/m ₃

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2.0 Sample Station Locations

Mobile real-time air monitoring is established along the Gulf Coast region. Sample locations will be identified using GPS coordinates and/or location descriptions. The active Waste Management sites will be chosen as a location for daily monitoring along the established mobile community air sampling routes.

3.0 Data Quality and Management

- All real-time instruments will be calibrated according to the manufacturer recommendations.
- Real-time readings will be documented by handwritten notes, on hand-held PDAs, or by the use of data logging capabilities of the instrument, if available.
- Data collected with a hand-held PDA will be quality assured and quality checked by the CTEH data management group. Data will then be included in a SCRIBE database.

4.0 Field Documentation

During the project, the team members will maintain various field books, reports, electronic data collection devices, and/or logs.

5.0 Calibration and Maintenance of Field Instruments

The calibration and maintenance of field equipment and instrumentation will be in accordance with each manufacturer's specifications or applicable test/method specifications, and will be recorded in CTEH calibration logs.

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APPENDIX J

Additional Container Management Measures – Pecan Grove Staging Area

Air Monitoring

Waste Management's (WM's) SOP for managing containers at the Pecan Grove, MS, Waste Staging Area includes the following:

Hydrogen Sulfide (H₂S), Volatile Organic Compounds (VOCs), and Lower Explosive Limits (LEL) all pose a risk to employees when found at high concentrations. The primary concern to WM personnel is the potential presence of H₂S in some of the roll-off containers related to the MC252 Spill Response.

The primary concern comes from containers whose contents are previously deployed absorbent booms that contain oily waste and vegetation (seaweed, etc.). Over time these booms, when left in a closed container, can generate quantifiable levels of H₂S.

The current levels of exposure for H₂S that are permitted are no greater than 20 parts per million (ppm) ceiling limit for a normal work period with the following exception, if no other measurable exposure occurs during the normal work day, exposure may exceed 20 ppm but may not exceed 50 ppm for a single time period of greater than 10 minutes. Based on these numbers, the following steps will be instituted for managing the above hazards at all WM Staging Areas.

1. Containers will be vented 30 minutes prior to shipping to decrease the likelihood of transport truck driver or landfill employee exposure. Staging area employees will wear H₂S personal monitors (BW Crickets or equivalent) within the container storage portion of the Waste Staging Area.
2. Upon request, the Center for Toxicology & Environmental Health (CTEH) will provide support to WM in the form of real-time air monitoring. A request will be made for box testing by the WM Site Safety Officer to the BP Industrial Hygiene representative at the Mobile ICP when any personnel badge indicates an alarm condition. The BP Industrial Hygiene representative will initiate a request to CTEH for testing. Boxes that are tested and determined to pose a risk pertaining to H₂S, VOC, or LEL will be considered as a continuous risk until such time that they reach the point of final disposition.
3. When CTEH arrives to test boxes, WM personnel will accompany them and be prepared to provide further container venting if it is determined that H₂S, LEL, or VOC readings are at or above prescribed limits.

Container Inspections

Each container will be inspected daily by WM and/or the onsite Waste Specialist for the following:

1. Container number
2. Area or Location
3. Evidence of leaks
4. Cover conditions
5. Liner installation condition
6. Notes and/or corrections

Results of the Inspection will be documented on the following form:

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Inventory Control

Inventory control will be managed by use of an electronic spreadsheet and placement of date labels on the containers. The Waste Specialist will log the containers into the electronic spreadsheet upon container arrival at the staging area. The spreadsheet will automatically calculate the departure deadline (45 days from arrival date).

The Waste Specialist will prepare a label for the container that will include arrival date and departure deadline, and place the label on the container.

The Waste Specialist is responsible for completing and maintaining the container inventory form, submitting the form electronically to the ERM Waste Manager and notifying the onsite Waste Management representative in advance of a container's departure deadline

An example of the electronic spreadsheet is provided on the following page.

STAGED CONTAINER INVENTORY FORM

Container ID	Contents (in %)	Location of Origin	Date Received	Label Affixed?	Ship Deadline	Date Shipped	Shipment Destination	Comments
1047RB	SOFT BOOM#50 MSW-15	PASCAGOULA	8/1/2010		9/15/2010	8/19/2010	THEODORE RECYCLING	
N40244	SOFT BOOM#50 MSW-50	PASCAGOULA	8/1/2010		9/15/2010	8/18/2010	THEODORE RECYCLING	
R8042388	HARD BOOM#100	PASS CHRISTIAN	8/3/2010		9/17/2010			
R1013	BAGGED SAND-80 PPE-2	PASCAGOULA	8/3/2010		9/17/2010	8/18/2010	CLEARVIEW LANDFILL MS	
2322	SOFT BOOM#80 BAGGED OILY SAND-40	PASCAGOULA	8/4/2010		9/18/2010	8/18/2010	CLEARVIEW LANDFILL MS	
1822RB	BAGGED PPE-95 BAGGED OILY SAND-5	GULFPORT	8/4/2010		9/18/2010			
2081	BAGGED SAND-100	PASCAGOULA	8/5/2010		9/18/2010			
RT1986	MSW	PASCAGOULA	8/5/2010		9/18/2010			
R80425116	PPE-70/ SOFT BOOM#100 MSW-10 MIXED OILY DEBRIS-10	PASCAGOULA	8/5/2010		9/18/2010			NEEDS TO BE DISPOSED. INCORRECTLY STAGED WITH CONTAMINATED.
R8042362	PPE-80/ SOFT BOOM#40	PASCAGOULA	8/5/2010		9/18/2010			
2610	SOFT BOOM#80	PASCAGOULA	8/5/2010		9/18/2010			
R80825342	BAGGED PPE-80/ SOFT BOOM-20	PASCAGOULA	8/5/2010		9/18/2010			
N46350	SOFT BOOM#75 PPE-20 HARD-5	PASCAGOULA	8/5/2010		9/18/2010			
N47854	SOFT BOOM#100	BAYOU CADDY	8/5/2010		9/20/2010			
2889	PASS CHRISTIAN	BILOXI	8/6/2010		9/20/2010			
N39783	BAGGED PPE-90/ SOFT BOOM#5/ BAGGED OILY SAND-5	BILOXI	8/6/2010		9/20/2010			
RT1975	HARD BOOM#70 OILY ROPE-15/ MSW-15	BILOXI	8/7/2010		9/21/2010			
N48811	HARD BOOM#75/ SOFT BOOM-25	HENDERSON POINT	8/7/2010		9/21/2010			
RT2010	SOFT BOOM#100	HENDERSON POINT	8/7/2010		9/21/2010			
608125	SOFT BOOM#100	PASCAGOULA	8/7/2010		9/21/2010			
N48541	BAGGED SAND AND TAR BALLS-100	PASCAGOULA	8/7/2010		9/21/2010	8/13/2010	THEODORE RECYCLING	
1609RB	BAGGED SAND AND TAR BALLS-100	PASCAGOULA	8/7/2010		9/21/2010	8/18/2010	CLEARVIEW LANDFILL MS	
R829682	SOFT BOOM#80/ BAGGED DEBRIS	PASCAGOULA	8/7/2010		9/21/2010	8/18/2010	CLEARVIEW LANDFILL MS	
2030	BAGGED SAND-80/ SOFT BOOM-20/ MSW-20	PASCAGOULA	8/8/2010		9/22/2010	8/18/2010	CLEARVIEW LANDFILL MS	
N28520	SOFT BOOM#100	PASCAGOULA	8/8/2010		9/23/2010			
2801	SOFT BOOM#100	PASCAGOULA	8/8/2010		9/23/2010			
2579	SOFT BOOM#50/ BAGGED PPE-50	PASCAGOULA	8/8/2010		9/23/2010	8/13/2010	THEODORE RECYCLING	
N37379	HARD BOOM#60/ SOFT BOOM-40	5TH ST DECON	8/9/2010		9/23/2010	8/18/2010	THEODORE RECYCLING	
R80825389	HARD BOOM#80/ SOFT BOOM-20	BAYOU CADDY	8/9/2010		9/23/2010	8/18/2010	CLEARVIEW LANDFILL MS	
N25162	SOFT BOOM#100	HENDERSON POINT	8/9/2010		9/23/2010			
601625	MATERIALS LIST PENDING	BILOXI	8/10/2010		9/24/2010			
RT2030	MATERIALS LIST PENDING	PASCAGOULA	8/10/2010		9/24/2010			
RT2034	MATERIALS LIST PENDING	PASCAGOULA	8/10/2010		9/24/2010			
2134027	MATERIALS LIST PENDING	PASCAGOULA	8/10/2010		9/24/2010			
2134033	MATERIALS LIST PENDING	PASCAGOULA	8/10/2010		9/24/2010			
R829824	SOFT BOOM#80/ BAGGED PPE	LONG BEACH	8/10/2010		9/24/2010			
584125	BAGGED PPE-70/ SOFT BOOM-30	108 8TH ST DECON	8/10/2010		9/24/2010			
2821	MSW-80/ SOFT BOOM-20	BAYOU CADDY	8/11/2010		9/25/2010	8/19/2010	THEODORE RECYCLING	
RT1201	BAGGED TAR BALLS-100	BAYOU CADDY	8/11/2010		9/25/2010			
2134030	HARD BOOM#100	BAYOU CADDY	8/11/2010		9/25/2010			
RT1761	BAGGED PPE-70/ SOFT BOOM-20/ MSW-10	BAYOU CADDY	8/11/2010		9/25/2010			
2825	BAGGED TAR BALLS-85/ BAGGED PPE-5	PASCAGOULA	8/11/2010		9/25/2010			
612725	MSW-85/ BAGGED PPE-15	PASCAGOULA	8/11/2010		9/25/2010			
2134086	MSW-85/ BAGGED PPE-5	PASCAGOULA	8/11/2010		9/25/2010			
R80825385	MSW-85/ BAGGED PPE-5	PASCAGOULA	8/11/2010		9/25/2010			
2134082	MSW-85/ BAGGED PPE-5	PASCAGOULA	8/11/2010		9/25/2010			
2134032	MSW-85/ BAGGED PPE-5	PASCAGOULA	8/11/2010		9/25/2010			
N38885	SOFT BOOM#100	PASS CHRISTIAN	8/12/2010		9/26/2010			
R80825388	SOFT BOOM#60/ BAGGED PPE-10	PASCAGOULA	8/12/2010		9/26/2010			
R8032588	MATERIALS LIST PENDING	PASCAGOULA	8/12/2010		9/26/2010			
RT1916	SOFT BOOM#80/ BAGGED PPE-10	PASCAGOULA	8/12/2010		9/26/2010			
R80425154	BAGGED SAND AND TAR BALLS-80/ BAGGED PPE-20	PASCAGOULA	8/12/2010		9/26/2010			
N48119	SOFT BOOM#40/ SOFT BOOM#80/ BAGGED PPE-20	PASCAGOULA	8/12/2010		9/26/2010			
1742	SOFT BOOM#40/ BAGGED PPE-40 MIXED OILY-20	PASCAGOULA	8/12/2010		9/26/2010			
2122	MSW-65/ BAGGED OILY MATERIAL-5	PASCAGOULA	8/12/2010		9/26/2010			
N24687	SOFT BOOM#70/ BAGGED PPE-30	PASCAGOULA	8/12/2010		9/26/2010			
1507	SOFT BOOM#100	HENDERSON POINT	8/12/2010		9/26/2010			

ELEVATED LEVELS OF H2S FOUND IN CONTAINER. LEL POTENTIAL
ELEVATED LEVELS OF H2S FOUND IN CONTAINER.

ELEVATED LEVELS OF H2S FOUND IN CONTAINER. LEL POTENTIAL

Notes
[a] Waste Specialist will calculate departure deadline (45 days from Arrival Date)
[b] Date label will include container number, arrival date and departure deadline.
[c] Waste Specialist is responsible for compiling and maintaining this form, daily container inventories, submitting form to the ERM Waste Manager and notifying Waste Management representative in advance of departure deadline.

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Revision log

Revision date	Content owner Name / title	Revision details
2 July 2010		
5 August 2010	Tim Thompson	45-day staging time for WM Pecan Grove Staging Area
25 August 2010	Tim Thompson	Incorporate 45-day staging at WM Pecan Grove Staging Area and associated, additional staging measures

