

REQUIREMENTS FOR TECHNICAL COMPLIANCE PLAN

The Contractor shall submit with its bid a Technical Compliance Plan (TCP) which will consist of the following four components: an Environmental Compliance Plan, an Operational Plan, a Business Plan, and a Health and Safety Plan. The TCP is the primary basis for the evaluation of:

- (a) the degree to which the Offeror's claims of performance capability are supported;
- (b) the ability of the Offeror to perform in accordance with the contract requirements; and
- (c) the intent to dismantle the vessels domestically, in accordance with U.S. statutory and regulatory requirements including, but not limited to TSCA, RCRA, OSHAct, as well as international laws, treaties, conventions and agreements, as applicable.
- (d) the intent to dismantle the vessels internationally, in accordance with all laws and regulations as applicable in the country where the dismantlement will occur using methodologies that are equivalent or greater than U.S. EPA statutory and regulatory requirements. The purpose of the TCP is for the Offeror to provide MARAD with sufficient detail that demonstrates a thorough understanding of regulations, production processes and project management associated with the dismantlement of a vessel. The TCP shall be so detailed, specific and complete as to enable Government personnel to make a thorough evaluation of the TCP and a sound determination that the offeror will have a reasonable likelihood of meeting the requirements and objectives of the Government. The TCP shall clearly and fully demonstrate that the prospective offeror has a valid and practical solution to the technical problems inherent in ship dismantling. If accepted, the TCP shall be incorporated as part of the Contract, as an addendum to the statement of work. The technical factors to be considered in evaluating the TCP are included in the Standing Quotations. Offerors are cautioned to pay particular attention to preparing their TCP and to provide sufficient detail in the TCP to demonstrate their complete understanding of the true scope of potential problems and risks involved in dismantling obsolete vessels, and the requirements to perform dismantlement operations in accordance with all laws and regulations.

ELEMENTS OF A TECHNICAL COMPLIANCE PLAN

A Technical Compliance Plan (TCP) shall consist of the following four components: an Environmental Compliance Plan, an Operational Plan, a Business Plan, and a Health and Safety Plan.

The TCP shall contain the following information and be organized as follows:

1. The Environmental Compliance Plan

a. The Environmental Compliance Plan (ECP) shall demonstrate your firm's ability to comply with and understand environmental regulations as they apply to the dismantling of ships and the maintaining of a dismantling facility. The ECP, at a minimum, shall address processes and procedures for identification methods, (sampling/analysis) of hazardous materials, as well as handling, treatment, storage, transportation and disposal methods for hazardous materials and wastes on a per-contaminant basis. The processes and procedures shall describe the interface with ship dismantling activities, and the sequencing of these processes in the overall dismantling performance schedule.

- b. The ECP shall identify the systems and equipment aboard a vessel that potentially contain hazardous materials. Knowledge of the Environmental Protection Agency (EPA) promulgated protocols and test methods, as well as applicable Federal, State and local regulations must be demonstrated. (The ECP shall include your firm's process and procedures to ensure that all proposed subcontractors have proper and valid permits, certifications, and properly trained and experienced personnel.
- c. The ECP shall describe the roles and responsibilities of contractor personnel in processing and disposing of hazardous materials and wastes.
- d. Also included in the ECP are:
- Site permits, registrations, notifications, and plans.
 - Pertinent information of facilities and subcontractors.
 - Sampling and testing of suspect materials.
 - Plans, permits and procedures for mitigating pollution.
 - The facility must identify each and every regulatory agency having potential jurisdiction over the ship dismantling operations at the facility proposed for use in performance of the contract.
- e. The ECP must include a statement of determination whether the facility, any parent companies, subsidiaries or affiliates or proposed subcontractors within the past five years, has received from any Federal, State or local regulatory authority or foreign government, any a) notices of violations, b) fines or proposed fines, c) convictions, or d) citations, or has been or currently is the subject of any judicial or administrative proceeding related to the violation or alleged violation of any applicable law related to environmental compliance.

2. The Operational Plan

a. The Operational Plan (OP) shall demonstrate your firm's proposed production methods for performing the dismantling of a vessel. The OP shall describe the entire process of dismantling a vessel, from, a) preparing the ship for tow, b) management, oversight and emergency response during the tow, c) coordinating the removal, storage, and disposal of hazardous materials and wastes, d) integration of hazardous material and waste remediation with the vessel superstructure and hull dismantlement, to e) recycling of salvageable materials.

At a minimum the following shall be included in the operation plan:

- Methods for mooring and securing the vessel during the dismantling process, including a description of procedures to secure the vessel for severe weather, i.e., storms, hurricanes, etc.
- Production methods to be utilized during the various vessel dismantlement phases, including a description of how the ship will be prepared for and towed to ensure safe transport of the ship to the ship breaking facility.
- If proposing to utilize a dry-dock, slip, marine railway or other method for dismantling the vessel, the OP shall include methods for ensuring ship stability during the dismantlement process, complete dismantlement of the hull, and measures to prevent flooding or sinking.
- A plan view showing the layout of the facility to be used for vessel dismantlement. Provide a description of the facilities to be utilized including available space for mooring ships, piers, dry-docks, and/or marine rails and/or slips and other industrial equipment. Describe the characteristics of the facility such as water depth, accessibility, capacities (monthly tons, annual number of ships) and any maintenance and dredging that has occurred.
- A description of how various hazardous materials/wastes and recyclable materials are processed through the facility.

- A description of the methodology and procedures for identifying and segregating all material, including hazardous material and waste from different vessels so as not to commingle materials from different vessels.
 - A performance schedule that identifies all tasks required for ship dismantling.
 - A description of the methodology and samples of the tools used to monitor the work, including subcontractors. A description of the current workforce including a list of the types of training received.
 - A description of how recycled materials and salvageable items are sold and disposed.
 - Describe the planned arrangement of facilities to accommodate the flow of hazardous material and recyclable materials to support complete dismantling, including:
 - Production flow of recyclable material
 - The facilities and processes used to insure segregation of all materials removed from each MARAD vessel and all other vessels to prevent commingling of hazardous materials and wastes.
 - Identify the locations of the facilities used on the required facility layout drawing.
- b. The Operational Plan (OP) shall demonstrate the complete dismantlement, recycling and disposing of the vessel in its entirety. This includes the removal, abatement and proper disposal of all hazardous materials/wastes found onboard the vessel and deconstruction of the vessel such that no considerable part of the ship is left intact or undisturbed to the extent that it can be reconstructed or readily identified as an existing portion of the original vessel. Dismantlement is defined as reducing the vessel such that it has no value except for its basic material content.

3. The Business Plan

- a. The Business Plan (BP) shall demonstrate your firm's ability to manage costs, personnel, subcontractors and the facility. The BP shall include the following:
- b. The location at the facility where the hazardous material/waste abatement, handling, storage and ship breaking activities will be conducted
- c. A description of the facility's management and organization including names and resumes of all Corporate and Key Personnel. Key Personnel shall have the appropriate level of skill and experience sufficient to accomplish the scope of work. The Contractor shall provide resumes, and descriptions of the experience including certifications as appropriate for the individuals submitted as Key Personnel. Key Personnel shall have the appropriate level of skill and experience sufficient to accomplish the scope of work. The Contractor shall provide resumes, and descriptions of the experience including certifications as appropriate for the individuals submitted as Key Personnel.
- Key Personnel - The Contractor shall provide key management personnel to adequately manage and oversee the below list of ship dismantling functions.
 - Project Management: The Project Manager is a full-time on-site person responsible for the performance of all work required under this Contract. The Project Manager shall be responsible for submitting status reports in accordance with the reporting requirements contained in the Contract. The Project manager shall be the primary point of contact with the MARAD COTR and shall be knowledgeable about the activities and status of all aspects of the project. The Project Manager shall be an employee of the Contractor or a subcontractor hired by the Contractor to perform the Project Manager function. At no time shall the Project Manager be an employee of, or subcontractor to any company hired by the Contractor to perform hazardous waste remediation, disposal and/or ship dismantlement activities. The Project Manager shall have decision making authority for

all issues related to the remediation of hazardous materials and physical dismantlement of the vessel and shall be in attendance at all bi-weekly meetings and teleconferences with the Government COTR.

- Environmental, Safety & Health Management: The ES&H Manager is responsible for all environmental and safety matters relating to the ship dismantlement Contract. The ES&H manager shall be the primary point of contact with the MARAD COTR and shall be knowledgeable about the activities and status of all ES&H aspects of the project. The ES&H Manager shall be an employee of the Contractor or a subcontractor hired by the Contractor to perform the ES&H Manager function. At no time shall the ES&H Manager be an employee of, or subcontractor to any company hired by the Contractor to perform hazardous waste remediation, disposal and/or ship dismantlement activities. The ES&H Manager shall be in attendance at all bi-weekly meetings and teleconferences with the Government COTR.
- Contracting Official – The Contracting Official is responsible for all contract administration activities related to the management and oversight of the MARAD ship dismantling contracts. The Contracting Official shall have the authority to negotiate and bind the company with regard to contract actions such as contract modifications, invoices and official correspondence. The Contracting Official shall be the primary point of contact with the MARAD CO and ACO and shall be knowledgeable about the activities and status of all contractual aspects of the project. The Contracting Official need only participate in those meetings and teleconferences as requested by MARAD. At no time shall the Contracting Official be an employee of, or subcontractor to any company hired by the Contractor to perform hazardous waste remediation, disposal and/or ship dismantlement activities.

The Key personnel identified by the Contractor shall remain in their positions for the duration of the contract. Changes to the Key personnel cannot be made without a minimum of 2 weeks notification and MARAD approval.

c. Evidence of the availability of the proposed dismantlement facilities for the duration of the contract performance, either by ownership, existing lease, or by letter from the facility owner indicating a statement of intent to utilize such facilities for dismantling. Also include evidence that the site-specific permits are currently in effect or can be obtained prior to the start of ship dismantling or hazardous waste/material removal.

d. Previous use of the facility over the past 10 years.

e. A description of dismantling activities to be accomplished by the contractor and those to be subcontracted.

f. A description of the security procedures at the dismantlement facility for the protections of ships and materials.

g. Performance Schedule:

- Provide a schedule for each ship proposed showing the progressive order in which your firm proposes to execute the dismantling work to include the scope of work milestones in attached and the following points:
- Planned completion dates and a timeline for each phase of the Project.
- Identify which work items are considered on the critical path to completion of the Project.

- Identify the milestone date by which all permits and licenses shall be obtained and in effect. Identify all milestones such as the final date of sale of materials that must be accomplished for the completion of the Project.

h. Approach to Cost Control:

- Describe your approach to maximizing recyclable material sale proceeds.
- Define your methodology used to capture cost data to the individual hazmat/waste/ recyclable material /equipment/component/material level

i. Subcontractor Management:

- Describe your processes and procedures used to monitor the work of all subcontractors, including those performing hazardous waste/material removal, disposal, and ship breaking.
- Describe the subcontractors' and the services they will provide regarding the ship dismantlement and hazardous waste/material removal.

NOTE: Offerors' schedules should consider Contract award as the start date for their schedules. Subsequent milestones and events should be tied to this start date.

4. The Health and Safety Plan

a. The Health and Safety Plan (HSP) shall demonstrate your firm's ability to operate and sustain a safe working environment. The HSP shall describe the processes and procedures used by your firm to ensure a safe and healthy working environment, including roles and responsibilities of facility personnel in accomplishment of this function. At a minimum the HSP shall include:

- Procedures for testing and monitoring worker exposure to hazardous materials.
- Diving operations used to dismantle the vessel.
- Confined and enclosed space procedures used during vessel dismantlement.
- Welding, cutting and heating procedures used during vessel dismantling.
- Fire prevention and protection procedures.
- Fall protection procedures.
- Hazardous materials/wastes (PCB, Asbestos, Lead) safety and worker exposure monitoring procedures.
- Personal Protective Program procedures.
- Hazardous Liquid Spill Containment and emergency response procedures.

Performance Schedule Milestones:

The Contractor shall incorporate into the performance schedule the following major contract milestones and their required due dates as listed. Milestone Due Date:

Milestones	Due Date
Deliver Sub-Contractor Listing	3 days after Contract award.
Deliver Key Personnel Roster	3 days after Contract award.
Deliver Certificates of Company Insurance	5 days after Contract award.
Deliver Certificate of Asbestos Abatement Liability	5 days after Contract award.
Deliver Performance Bond	10 days after Contract award.
Deliver Initial Performance Schedule	7 days after Contract Start Date.
Deliver Tug Safety Management Certificate	10 days after Contract Start Date.
Deliver Performance Schedule Activity	7 days after Contract Start Date.
Weighted Average Breakdown	
Deliver Surveyor's Trip in Tow Recommendation Report.	When presented to the USCG.
Deliver Liquid Load /Ballast Plan for towing.	Not later than 7 days prior to tow.
Deliver Vessel Afloat Monitoring Plan	10 days after Contract Start Date, but not later than 3 days prior to the vessel departure from the fleet.
Deliver Towers Insurance not later than:	3 days prior to vessel departure from the fleet.
Deliver Facilities Pollution Insurance	3 days prior to vessel departure from the fleet.
Deliver U.S.C.G. Load line Exemption /Order for Departure	Prior to the vessel departure from the fleet.
Remove Vessel from Fleet	NLT 45 days after the issuance of NTP.
Deliver Pre-Arrival/Arrival Reports	4 days after vessel arrival.
Deliver Hazardous Materials/Wastes	10 days after vessel arrival.
Inventory/Contractor Estimate.	
Deliver Tank Content Verification Report	10 days after vessel arrival.
Deliver Validation of Contractor HM/HW estimates by sampling and analytical results	20 days after vessel arrival.
Complete PCB Abatement	TBD by contractors performance schedule.
Complete Asbestos Abatement	TBD by contractors performance schedule.
Complete all Hazmat Removal/Disposal	TBD by contractors performance schedule.
Begin Vessel Dismantling	TBD by contractors performance schedule.
Remove Last Structural Piece from Slip	TBD by contractors performance schedule.
Complete Vessel Dismantling	TBD by contractors performance schedule.
Complete all Material Sales and Recycling	30 days after removal of last structural piece from the slip.
Complete Facility Cleaning and Restoration	30 days after removal of last structural piece from the slip.
Deliver Certificate of Destruction	30 days after removal of last structural piece from the slip.
Deliver Closeout-Report and Final Schedule	30 days after removal of last structural piece from the slip.