RECOVERED OIL / WASTE MANAGEMENT PLAN HOUMA INCIDENT COMMAND

VERSION 2

INCIDENT NAME: **MC 252**

TYPE & AMOUNT: **CRUDE OIL >77,000 BBLS (as of 5/8/10 on ICS 209)**

SPILL - LOCATION: **MC 252 Incident**

SPILL - DATE/TIME: **22 April 2010 2215**

Approved by: RPIC- Mike Utsler 5/9/2010

Recommend FOSC approval. E.M. Rhodes, Capt USCG FOSCR 5/9/10

FOSC-

SOSC- Roland Guidry

EMC 5/9/10

Section I. Incident Background

This plan is written at the request of the Incident Commander, the U.S. Coast Guard (USCG) FOSC and the State of Louisiana SOSC. This plan will cover over-arching oil recovery and waste management issues relating to the incident which includes the following activities; oil skimmed off of the water, oil collected from absorbents, decontamination, shoreline impact cleanup and wildlife rehabilitation. The Houma incident command center will be the area covered under this plan. This plan is to cover to oil spill clean-up activities associated with the Deepwater Horizon rig incident where the source point originated in Mississippi Canyon Block 252 of the Gulf of Mexico.

The Responsible Party will abide by all applicable state, local and federal laws and regulations while implementing this plan.

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SECTION II. WASTE IDENTIFICATION / CHARACTERIZATION

The following identified categories of material are covered in this plan. Volumes of these types of each collected materials will be difficult to determine and are updating daily due to circumstances associated with the oil spill containment operation and is updated daily on the ICS 209 form.

1. Crude oil skimmed/collected from the water and spill source (Reclaimable/Recyclable oil, E&P Waste)
2. Shore line material collected that is contaminated with crude oil, once drained of practically recoverable oil (E&P Waste/Industrial Waste)
3. Decontaminated fluids from cleaning response vessels, reusable boom, and other such containers contaminated with crude oil (Reclaimable/Recyclable oil, E&P Waste)
4. Non Oil Contaminated general waste such as trash collected from response vessels responding to crude spill event, and material associated with Shore line operation (Municipal Waste)
5. Medical waste associated with wildlife rehabilitation or staging areas (Medical Waste)
6. Dead or Injured Wildlife (United States Wildlife and Fisheries/ and Louisiana Department of Wildlife and Fisheries to coordinate)

SECTION III. WASTE MANAGEMENT APPROACH

Given the complexity of the anticipated landfall of this material and various staging areas the plan is designed to allow for the crude oil contaminated material to be disposed of at E&P exempt facilities under the authority of the Louisiana DNR, and Industrial waste facilities regulated under the authority of the Louisiana DEQ. Each staging area will have predetermined approved locations to take this material. The approved locations, profiling requirements including sampling requirements are included in Appendix A (Houma IC Approved Facilities).

An overall strategy will be employed to reclaim or recycle as much oil as practical prior to having the spill material for disposal.

Heritage Environmental is the selected contractor charged with the proper handling of these recovered material prior to reclaim/recycle or disposal. Heritage has been tasked with the following activities:

- Sourcing waste containers and transportation at the decontamination/staging areas
- Segregating, labeling and correctly storing wastes
- Sampling waste containers in order to characterize wastes, as needed
- Completing profiles at approved disposal sites (BP or waste contractor approved see appendix A)
- Completing Waste Manifests for waste sent offsite for disposal
- Tracking of wastes volumes collected and transported.

SECTION IV. OIL RECOVERING / WASTE HANDLING

The following actions are anticipated to occur in handling this oily recovered material.

1. Segregate oil reclaim/recycle material and waste streams, as much as practical, into the waste/ recovery types listed in Appendix A
2. Individual Staging Area Heritage waste coordinator will label containers appropriately with "BP", MC 252 Event, waste type and start date of accumulation.
3. Waste containers and transportation from the staging area will be provided by Heritage Environmental Services.
4. Upon arrival of waste to the dock or shoreline operations will contact the closest Individual Staging Area HES waste coordinator to request container or location of waste collection area. See Appendix A, and Section V. for details of locations.

5. Industrial wastes/ E&P wastes for disposal in landfill will be profiled and signed by BP Waste coordinator from the Houma IC with the appropriate receiving disposal/recycling facility prior to shipment offsite.
6. All wastes requiring manifesting will be manifested appropriately according to State and Federal requirements and tracked on a spreadsheet Heritage provides to keep the ICS 209 form up to date.
7. Heritage individual staging area waste coordinator will track all manifests on behalf of BP

Each staging area will be equipped with a sufficient supply of DOT-approved containers and with sufficient back-up DOT-approved containers. Each container will be clearly labeled with the appropriate waste stream. Once waste begins to be accumulated within a container, the container shall be labeled with the accumulation start date. The label indicating what is within the container shall remain in place and legible. Once accumulation begins within a container the Heritage Environmental Services representative shall arrange to have the backup container in place. At no time shall we have less than two days worth of containers on site for each waste stream.

Each staging area will be manned with at least one each of the following people during operating periods:

- Security Personnel
- BP Personnel (or the equivalent)
- Heritage Environmental Services Personnel

Upon receiving the waste at the waste segregation area, BP and Heritage personnel will place or supervise the placement of the waste into the appropriate containers. Once a container is considered full, the Heritage personnel shall ensure that the container is properly covered and labeled for transportation. Transportation shall be arranged by the Heritage individual staging area waste coordinator. If the waste is transported under a manifest rather than a Bill of Lading, the manifest shall be signed by BP personnel or their Heritage Environmental designees.

Only known BP clean-up contractors shall be allowed to bring waste to the staging areas. If others attempt to deposit non-spill related waste at the staging areas they shall be immediately turned away by security personnel.

SECTION V. WASTE MANAGEMENT LOCATIONS / STAGING AREAS

The following staging areas are currently identified and may change frequently upon clean-up conditions in the locales needed the most.

Fourchon, Louisiana (site for final vessel decon)
Venice, Louisiana

Hopedale, Louisiana
Slidell, Louisiana
Grand Isle, Louisiana
Cocodrie, Louisiana

The currently approved Oil Recovery/ Recycling and disposal locations are identified in the attached Appendix A.

SECTION VI. TRANSPORTATION

Approved transporters will be used from the staging areas identified in section V. to the approved destination facilities identified in Appendix A. All transporters of recovered oil and solid waste generated as a result of the oil spill will be registered transporters with the LDEQ.

SECTION VII. FINAL DISPOSITION OR DISPOSAL

The ICS 209 form will be used to track the disposition of wastes and recovered product as it relates to this incident. Manifest tracking will be used at each staging area and rolled up to one combined at the Houma Incident Command Environmental Unit by the Waste handling contractor.

SECTION VIII. HEALTH AND SAFETY CONSIDERATIONS

Health and Safety considerations will be covered under the Site Safety Plan at each of the staging areas. Along with the site safety plans, a detailed decontamination plan addresses the concerns of decontamination and the transfer of this material to a recovered product or waste that is addressed in this plan.

Only known BP clean-up contractors shall be allowed to bring waste to the staging areas. If others attempt to deposit non-spill related waste at the staging areas they shall be immediately turned away by security personnel.

SECTION IX. QUALITY ASSURANCE

Oversight of staging area operations will be performed out of the Houma Incident Command Environmental Unit. Daily call in will occur at each site for collection of waste/recovery volumes, general flow of material, and any other issues that may arise from the operations of managing these areas as it relates to waste.

SECTION X. COMMUNITY RELATIONS

Community relations are vital to the handling of this unfortunate situation. With this in mind, a Community Outreach plan has been developed and is being utilized throughout this operation including at the staging areas that address community relations. This plan was also used in the planning and securing of these locations.

Submitted by:

Tracy Dyer/Jerry Harrington **DATE:** 5/8/10

Developed by: Tracy Dyer	Revised: 4/22/10 03:30
Revision 1	
Updated by: Jerry Harrington	Revised: 4/23/10 15:45
Revision 2	
Updated by: Kathy McCormick	Revised: 4/29/10 14:00
Revision 3	
Updated by: Kathy McCormick	Revised: 4/30/10 14:00
Revision 4	
Updated by: Maribeth Dobbins	Revised: 5/02/10 03:00
Revision 5	
Updated by: Tracy Dyer	Revised 5/04/10 18:00
Revision 6	
Updated by: Jerry Harrington	Revised 5/06/10 07:00
Revision 7	
Updated by: Jerry Harrington	Revised 5/08/10 07:30

APPENDIX A

Houma IC Waste Chart with Disposal Facilities

Houma Waste Chart
5_7_10.xls

Potential	Profiled

Waste Disposal Sites

Waste Disposal Plan - last updated 5/7/10

Waste Type	Description	Category	Management/ Containment	Container Labeling	Manifesting	Waste Disposal Location/Contact	Sampling requirements	Profile Number	Landfill restrictions/capacity
Disposable Boom	Oiled disposable boom that has had oil removed to the extent practical. Also containment boom that is no longer usable that has had oil removed to the extent practical.	Special waste	Place in marked container/rolloff box or cutting box that is lined.	Oily Absorbent/boom	Heritage non haz manifest	River Birch Landfill 2000 S Kenner Road Avondale, LA 70094 Contact: Vic Culpepper (504)363-1140	Sampling requirements	5501	Approved DEQ
						Tide Water Landfill LLC (Environmental Operators LLC) Coast Guard Road Venice, LA	Sampling requirements	??	
						Jefferson Davis Parish (Allied) Welch, LA	Sampling requirements	5103-10-6451	
						Colonial Landfill (Allied Waste) Sorrento, LA	Sampling requirements	5098-10-6238	Approved DEQ
		Hazardous waste (pending results from above)	Place in marked container/rolloff box or cutting box that is	Hazardous waste - oily Natural Debris	Uniform Hazardous waste manifest	Chemical Waste Management - Sulphur, LA	No additional sampling required	??	
Decon Water from Containment Boom	Washwater (crude oil, water, non listed **surfactant** resulting from decontaminating boom)	E&P Exempt	Frac tanks	Oily Water	UIC 28 Manifest	Newpark Environmental Fourchon #2 Site Code 2913 228 16th Streeet Fourchon, LA 70357	No sampling required.	NA	
						Newpark Environmental Venice	No sampling required.	NA	
						OMNI energy service Venice and Fourchon	No sampling required.	NA	
						River Birch Landfill 2000 S Kenner Road Avondale, LA 70094 Contact: Vic Culpepper (504)363-1140	No sampling required.	NA	

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Waste Type	Description	Category	Management/ Containment	Container Labeling	Manifesting	Waste Disposal Location/Contact	Sampling requirements	Profile Number	Landfill restrictions/capacity
Oil Contaminated Soils and Vegetative Debris	Oil contaminated natural debris i.e. seaweed, tree limbs, sand, etc.	E&P Exempt waste	Place in marked container/rolloff box or cutting box that is lined.	Oily Natural Debris	UIC 28 Manifest	River Birch Landfill 2000 S Kenner Road Avondale, LA 70094 Contact: Vic Culpepper (504)363-1140	No sampling required.	NA	No hours, no deq 3 day
		Hazardous waste (pending results from above)	Place in marked container/rolloff box or cutting box that is	Hazardous waste - oily Natural Debris	Uniform Hazardous waste manifest	Chemical Waste Management - Sulphur, LA	No additional sampling required		
Oil Contaminated Rags, Gloves, Disposable Personal Protective Equipment etc.	Oil Contaminated Rags, Gloves, Disposable Personal Protective Equipment etc.	Special waste	Place in marked container/rolloff box or cutting box that is lined.	Oily Absorbent/boom	Heritage non haz manifest	River Birch Landfill 2000 S Kenner Road Avondale, LA 70094 Contact: Vic Culpepper (504)363-1140	Sampling requirements	5501	Approved DEQ
						Tide Water Landfill LLC (Environmental Operators LLC) Coast Guard Road Venice, LA	Sampling requirements	??	
						Jefferson Davis Parish (Allied) Welch, LA	Sampling requirements	5103-10-6451	
						Colonial Landfill (Allied Waste) Sorrento, LA	Sampling requirements	5098-10-6238	Approved DEQ
		Hazardous waste (pending results from above)	Place in marked container/rolloff box or cutting box that is	Hazardous waste - oily Natural Debris	Uniform Hazardous waste manifest	Chemical Waste Management - Sulphur, LA	No additional sampling required	??	

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Waste Type	Description	Category	Management/ Containment	Container Labeling	Manifesting	Waste Disposal Location/Contact	Sampling requirements	Profile Number	Landfill restrictions/capacity
Oily Washwater not contaminated with Hazardous Waste	Oil and water collected from decontamination of equipment, vessels	E&P exempt	Frac tank or barge	Oil Spill Waste	UIC 28 Manifest	Newpark Environmental Fourchon #2 Site Code 2913 228 16th Streeet Fourchon, LA 70357	No sampling required.	NA	
						Newpark Environmental Venice	No sampling required.	NA	
						OMNI energy service Venice and Fourchon	No sampling required.	NA	
Dead Wildlife	Deceased wildlife recovered from the oil impacted areas	NA. This will be managed by the Dept. of Wildlife and Fisherie and will only be managed as a waste, if and when directed by that agency	NA	NA	NA	NA	NA	NA	
Oil Removed from Boom	Oil that has been recovered from boom decontamination water	Not a waste (offspec product) - send to oil refiner	Frac tanks	NA	TBD	See Oil Recovery Plan - TBD	Sampling required	NA	
		E&P exempt	Frac tank or barge	Oil Spill Waste	UIC 28 Manifest	Newpark Environmental Fourchon #2 Site Code 2913 228 16th Streeet Fourchon, LA 70357	No sampling required.	NA	

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Waste Disposal Plan - last updated 5/7/10

Waste Type	Description	Category	Management/ Containment	Container Labeling	Manifesting	Waste Disposal Location/Contact	Sampling requirements	Profile Number	Landfill restrictions/capacity
						Newpark Environmental Venice	No sampling required.	NA	
						OMNI energy service Venice and Fourchon	No sampling required.	NA	
						PSC			
Oil contaminated Municipal Trash	Cups, styrofoam containers and other manmade municipal trash that is contaminated with oil	Special Waste	Place in marked container/rolloff box or cutting box that is lined.	Oily Absorbent/boom	Heritage non haz manifest	River Birch Landfill 2000 S Kenner Road Avondale, LA 70094 Contact: Vic Culpepper (504)363-1140	Sampling requirements	5501	Approved DEQ
						Tide Water Landfill LLC (Environmental Operators LLC) Coast Guard Road Venice, LA	Sampling requirements	??	
						Jefferson Davis Parish (Allied) Welch, LA	Sampling requirements	5103-10-6451	

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Waste Disposal Plan - last updated 5/7/10

Waste Type	Description	Category	Management/ Containment	Container Labeling	Manifesting	Waste Disposal Location/Contact	Sampling requirements	Profile Number	Landfill restrictions/capacity
						Colonial Landfill (Allied Waste) Sorrento, LA	Sampling requirements	5098-10-6238	Approved DEQ
Uncontaminated Trash	Food waste, wrappings, paper, cardboard, soda cans, beach pre-cleanup waste	Municipal Waste	Place in marked container/rolloff box	Non oily trash	Heritage non haz manifest	River Birch Landfill 2000 S Kenner Road Avondale, LA 70094 Contact: Vic Culpepper (504)363-1140	No sampling required.	Not applicable	No hours, no deq 3 day
						Tide Water Landfill LLC (Environmental Operators LLC) Coast Guard Road Venice, LA	No sampling required.	Not applicable	
						Colonial Landfill (Allied Waste) Sorrento, LA	No sampling required.	Not applicable	
						Jefferson Davis Parish (Allied) Welch, LA	No sampling required.	Not applicable	
						Woodside Landfill (Waste Management) Walker, LA	No sampling required.	Not applicable	
						Jefferson Parish (Waste Management) Avondale, LA	No sampling required.	Not applicable	
Medical Waste	Bandages and items with possible blood borne pathogens	Special Waste	Placed in Red medical waste container	Medical Waste	Heritage non haz manifest	Stericycle LA	No sampling required	NA	

Potential	Profiled

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Waste Type	Description	Category	Management/ Containment	Container Labeling	Manifesting	Waste Disposal Location/Contact	Sampling requirements	Profile Number	Landfill restrictions/capacity
Oil Contaminated -Other Debris from shoreline clean up (high risk)	Oil contaminated other material not natural debris i.e. drums, paint cans, tires, batteries etc. that may be hazardous or require special approvals/handling	Varies pending content and characterization	Place in marked container/rolloff box that is lined.	TBD	TBD	Varies pending contents and characterization	Representative sample to be pulled and analized for full TCLP and ignitability to determine if waste is hazardous or non-hazardous.	??	
Skimmed crude oil	Oil and water collected from skimmers	Not a waste (offspec product) - send to oil refiner or reclaimer	Frac tank or barge	NA	TBD	See Oil Recovery Plan - TBD	Sampling required	NA	
		E&P exempt	Frac tank or barge	Oil Spill Waste	UIC 28 Manifest	Newpark Environmental Fourchon #2 Site Code 2913 228 16th Streeet Fourchon, LA 70357	No sampling required.	NA	
						Newpark Environmental Venice	No sampling required.	NA	
						OMNI energy service Venice and Fourchon	No sampling required.	NA	

Last Revised

Potential	Profiled

Waste Disposal Sites

Waste Disposal Plan - last updated 5/7/10

Waste Type	Description	Category	Management/ Containment	Container Labeling	Manifesting	Waste Disposal Location/Contact	Sampling requirements	Profile Number	Landfill restrictions/capacity
Tracy Dyer	5/7/2010 18:00								
Venice	Staging								
Slidell	Staging								
Hopedale	Staging								
Grand Island	Staging								
Fourchon	Decon								
Venice	Decon								
		Managed by							
Fort Jackson	Wildlife	Venice							
New Orleans	Wildlife								
	Profile #								
Colonial	5098-10-6238								
Jefferson Davis	5103-10-6451								
River Birch	5501								