

EXAMPLE WASTE MANAGEMENT PLAN

for the Careless Corporation Oil Spill

September 10 - 28, 1997

OBJECTIVES

To handle recovered oil, oily debris, and contaminated sand/dirt resulting from the subject oil spill so that the wastes do not cross-contaminate other areas that are clean. To ensure that all recovered oil and oiled debris are managed in accordance with state and federal regulations, while keeping operating costs down.

GENERATOR:

Name: Careless Corporation

Generator's EPA ID: 000 000 000

COLLECTION SITES

Collection Site Locations:

1. Yahoo Bay Yacht Club
1212 Wave Ave., Long Beach
2. Dolphin Beach Naval Storage Station
9875 Riptide Blvd., Long Beach

Approximately 8 **Vacuum trucks** (with attached skimmers) will recover oil directly from collection points and off-load at the Careless Corp. Terminal (CCT), Tank #11-XTC (130,000 bbl capacity).

The Coastal On-Water (COW) **recovery barge** (45,000 bbl capacity) will be emptied tomorrow morning at the CCT. Four additional tanks are also available with a capacity of 175,000 bbl on an as needed basis. Currently, Tank #12-XTC (130,000 bbl capacity) is available to accept oil from the barge. The recovered oil off-loaded by both the barge and vacuum trucks will later be processed into gasoline at the Careless Corp. Refinery.

WASTE TYPE & MANAGEMENT METHOD

Decanted Water: Water that is decanted from off-shore skimming operations will be released back to the ocean within the operational area, per the MOU between the State Oil Response Agency and the State Water Board.

Recovered Oil: Managed as a recovered product, and not a waste, as it will be used/reused as raw material as part of the process at the Careless Corp. Refinery.

Solid Oily Debris:

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If non-hazardous (oiled dirt/sand, PPE, trash, wood, seaweed, etc.) = No-Waste, Inc. and Action Clean-Up Company will transport waste to the Union Pacific Railroad loading facility (245 Pacific Rim Drive, Wilmington) and shipped to WasteCo (class II landfill) located in-state.

If hazardous = transport to the Union Pacific Railroad loading facility in Wilmington and on to Burn-It Industries (class I Waste Management Facility) in Utah.

No-Waste is currently doing beach pre-cleanup, while Action Clean-Up and Wacco Waste Co. are available to be contracted out by Careless Corp. to do waste sampling, transport to lab, clean-up, and HW transportation, as needed. All three contractors are available for oily debris beach clean-up in the event oil does impact the shoreline.

Oily Sand/Dirt: Sand and/or dirt that is oiled will be placed in bins stored at the temporary waste storage area (if no bins area available, the sand/dirt can be stockpiled at the staging areas - lined and covered with visqueen), until results of the samples reveal whether or not the oiled sand/dirt is hazardous or non-hazardous. If hazardous, will transport to Burn-It Industries; if non-hazardous, it will be transported to Ace Asphalt for use in their asphalt processes.

Waste from Decon Operations: Liquid Waste: Two Baker Tanks (each with a capacity of 500 bbls) will be located at each field staging areas/command posts. Oily water waste will be held in the Baker Tanks and off-loaded by vacuum trucks and transported to Cryer & Underwood in Wilmington for recycling. Solid Waste: Solid wastes resulting from decontamination operations will be placed in the bins labeled "Contaminated Waste" (which are already located at the temporary storage sites, next to the field staging areas/command posts) and will be managed the same way as the solid oily debris.

Waste from Wildlife Rehab Operations: Liquid Waste - All oily water recovered from rehab operations will be stored in a portable tank for further analysis/waste characterization. If the oily water is acceptable for re-use, it will be brought back to the Careless Corp. Refinery and used as a "material" in the refinery process. If not acceptable for re-use, the oily water waste will be discharged to the sewer with an approved NPDES permit (local sanitation district has already given approval). Solid Waste - All solid oily wastes from rehab operations will be placed in visqueen-lined roll-on/roll-off bins and will be managed the same as solid oily debris.

Oiled Animal Carcasses: Any oiled animal carcasses will be handled and managed by state Oil Response Agency wildlife personnel.

WASTE MINIMIZATION:

Careless Corp. will brief field responders and contractors on waste minimization practices (e.g.: minimize use of sorbents and waste segregation), types of waste, labeling, packaging, etc.

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Pre-beach cleanup: Pre-beach cleanup of wood, seaweed and other debris prior to oil impacting the shoreline is being conducted by No-Waste, with Action Clean-Up and Wacco Waste are on stand-by.

Segregation of contaminated and non-contaminated wastes: Roll-off bins will be labeled as either “Contaminated Debris” or “Non-Contaminated Debris”, so as to avoid any cross-contamination.

TEMPORARY STORAGE SITES

Temporary Storage Site Locations: Yahoo Surf State Beach, Parking lot #8; and Dolphin Beach State Park, parking lot # 19. Both temporary storage sites are adjacent to the staging areas, and near the field command posts.

Ten roll-off bins lined with visqueen will be located at each temporary storage site. Each bin will be labeled “Contaminated Debris” and “Non-Contaminated Debris”, so as to avoid any cross-contamination. Each bin will be numbered in a chronological manner as they are received on-site (i.e.: #1 - 10), and letters to identify the site (i.e.: “YS” for Yahoo Surf, “DB” for Dolphin Beach). The identification numbers should, therefore, look as follows: *YS-1, YS-2; DB-1, etc.*

Each bin will be further identified by origin of waste (e.g.: “Yahoo Yacht Club”, etc.). Use duct tape and marker pen w/ indelible ink. Contents of bins will be assessed by Oil Response Agency and Careless Corp. representatives before transporting to an off-site facility. Bins will be marked as “hold” or “OK to transport” by the Oil Response Agency and Careless Corp. representatives. Assessment of bins may take up to 2 weeks, therefore, bins marked hold will be temporarily stored at the Careless Terminal, until the bins are assessed.

A State Oil Response Agency representative will also witness gauges of Baker Tanks containing liquid wastes.

Siting & Construction : Appropriate state agencies (Oil Response, Water Board, Coastal Commission, Toxic Substances) have approved the siting and construction of temporary storage sites prior to storage. All agencies have approved siting of temporary storage areas.

Temporary Storage Site Permits Required: State Toxic Substances Department and the Coastal Commission have granted emergency permits to operate the temporary storage sites as described above.

DECONTAMINATION SITES

Decontamination of response equipment (boat, boom, etc.) and personnel, as well as recreation and fishing boats, will be conducted at the following designated locations:

Yahoo Yacht Club

Ito Industries Dock

Mira Marina

GAUGING OF RECOVERED OIL

Skimmed oil from marine waters:

1. From COW vessels to Barge #119. A state Oil Response Agency representative will be on-scene to witness gauging. Barge #119 to Careless Terminal to off-load into Tank #12-XTC. A state Oil Response Agency representative will witness gauges, watercut, and will sample oil prior to any transfers. Additionally, Marine Terminal Safety Inspectors from the State Lands Commission-Marine Facilities Inspection Division will assist the state Oil Response Agency with gauging and oil transfer operations issues, as needed.
2. During Lightering of the damaged Barge, oil will be skimmed from damaged tanks. This oil will be handled SEPARATE from the recovered skimmed oil, as this is oil that has not been spilled.
3. Oil skimmed from the water at collection points will be transported to Careless Terminal Tank #11-XTC by vacuum truck. A Careless Corp. representative (or designee) will record each load amount and the collection point from which the vacuum truck came from. A state Oil Response Agency Representative will conduct daily spot checks.
4. State Oil Response Agency will witness all final closing gauges when transfers are finished.

Recovered oil from the beaches: State Oil Response Agency will be assessing the amount of oil accumulated in the bins at the temporary storage sites along with the Careless representative (or designee). Bins will not leave the temporary storage sites until this has been completed.

SAMPLING PROTOCOL

Protocol: Sampling of the recovered oil and oily debris will be followed in accordance with the attached Sampling Protocol. Sampling will be conducted by the state Oil Response Agency and/or the Careless representative (or designee). All analytical results will be shared amongst Careless Corp., state Oil Response Agency, U.S. Coast Guard, and NOAA (NRDA Team).

State Certified Hazardous Waste Laboratory: Careless Corp. already has a contract in place with **Del Lago Analytical**. Representative waste samples will be analyzed for flashpoint, state metals, and TCLP EPA Method 8240 to determine whether or not the waste is hazardous.

TRANSPORTATION

Highway: Action Clean-Up and/or No-waste. Both are registered hazardous waste haulers and are certified by the state Toxic Substances Department.

Rail: Union Pacific

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Recovered oil that is considered a hazardous waste does not need a manifest to transport from the spill site to the Careless Refinery or Terminal, as it is a transportation-related spill incident and is exempt from that requirement (per regulation section xxxxx). Recovered oil that is not considered a waste, but a material to be used/reused at the terminal, does not require manifests for transportation from the spill site to the Careless Terminal. Manifests will be used when transporting hazardous wastes (and a Bill of Lading for non-hazardous wastes) from the spill site and/or the Careless Terminal to the Wilmington Railroad transfer facility and then by rail to Burn-It Industries.

OFF-SITE WASTE MANAGEMENT FACILITY

Burn-It Industries, located in Utah.

Ace Asphalt, located in Azusa, California

REQUIRED PERMITS/GOVERNMENT AGENCY CONTACTS

State Toxic Substances Department @ (800) 555-4998. To obtain emergency permits for the temporary storage sites. The Toxic Substances Dept. has granted an emergency permit over the phone for the temporary storage sites.

State Coastal Commission @ (800) 555-3886. For work at the temporary storage sites which occurs within the coastal zone. The Coastal Commission has granted an emergency permit for the temporary storage sites and will hand-deliver it by 5:00 p.m. today.

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