BECKER AND LEGACY WELLS ABANDONMENT AND REMEDIATION PROJECT OIL SPILL CONTINGENCY PLAN

California State Lands Commission

May 2017
# TABLE OF CONTENTS

1.0 Project Description............................................................................................................ 1
2.0 Purpose and use..................................................................................................................... 2
3.0 Pre-project planning and protocols ..................................................................................... 2
4.0 Oil Spill Sources ................................................................................................................ 2
5.0 Spill Response .................................................................................................................... 3
  5.1 Containment and Capture ................................................................................................. 3
  5.2 Recovery and Cleanup ........................................................................................................ 3
  5.3 Initial Response Actions ...................................................................................................... 3
  5.4 Initial Response Team ......................................................................................................... 4
  5.5 Onsite Response Equipment ............................................................................................... 4
6.0 Notifications ....................................................................................................................... 4
  6.1 Communication .................................................................................................................. 5
  6.2 Notification Matrix Table .................................................................................................. 5
  6.3 Agency Notifications ......................................................................................................... 6
  6.4 Emergency Information Checklist ..................................................................................... 8
7.0 Spill Scenarios ................................................................................................................... 8
  7.1 General Spill Scenario ....................................................................................................... 8
  7.2 Onshore Spill Scenario - Minor Oil Spill .......................................................................... 9
  7.3 Fueling Operations/Fuel Staging Area .............................................................................. 10
  7.4 Offshore Spill ................................................................................................................ 11
8.0 Protection of the Environment from Project Waste .......................................................... 12
1.0 PROJECT DESCRIPTION

The Becker and Legacy Wells Abandonment and Remediation Project (Project) proposes to abandon the Becker well to current Division of Oil, Gas, and Geothermal Resources (DOGGR) standards to alleviate oil leaking into the environment. The abandonment methodology for the Becker well shall be used as a model for other potentially leaking nearshore wells (legacy wells) along the Santa Barbara coastline.

A jack-up barge, 80 feet by 100 feet in size, is proposed to provide access to the Project site from the ocean and would be used during all construction activities at the well, including well abandonment. Project construction activities would occur in three main phases:

- Construction of a double-walled cofferdam in the surf zone around the well to isolate it from ocean tides and provide access to the well;
- Well abandonment; and
- Cofferdam removal.

Additional details on the Project is contained in the Project Environmental Impact Report. The Project location is shown below in Figure 1.

**Figure 1. Map Location of Becker Well**
2.0 PURPOSE AND USE

The primary focus of this Spill Contingency Plan is the prevention of incidents which might cause pollution, but in recognition that complete elimination of risk is impossible. This Oil Spill Contingency Plan (OSCP) describes the resources and procedures that would be used to mitigate potential impacts.

Containment generally involves preventing spilled or collected seep oil or seep oil contaminated water from reaching the ocean, as well as preventing oils and hazardous materials used by construction equipment (diesel fuel, hydraulic oils, etc) from reaching the ocean. Containment would involve multiple strategies to address possible spill sources. In the ocean, the primary approach would be the containment of any spills combined with the rapid containment and removal of any materials and to prevent the oil from spreading with the tides, current or wind.

3.0 PRE-PROJECT PLANNING AND PROTOCOLS

A number of preliminary activities shall be implemented prior to the construction phase. These include the following:

- Coordination and contracting with response contractors, such as Clean Seas, to ensure availability during the construction phase;
- Confirmation of equipment availability, including booms on the response boats, response equipment in the response trailer and response equipment located on the barge;
- Coordination with Native American Tribes culturally affiliated with the Project area;
- Training of all construction employees who may be involved in response activities, including those who may only be required to initiate initial spill recognition and evacuations.

Documentation of the above pre-project planning requirements shall be maintained throughout the life of the Project.

4.0 OIL SPILL SOURCES

Sources of oil or other hazardous materials could include the following:

- Surface seep crude oil during excavation (contaminated sands, oil on the beach surface, etc.);
- Sub surface crude oil in saturated sands;
- Crude oil leaking from well or well casing; and
Becker and Legacy Wells Oil Spill Contingency Plan

- Leakage or spillage of fuel, hydraulic oils or lubricants from the equipment used during construction and abandonment activities.

The seep oil may migrate from its shallow source during excavation but is under very low to no pressure since there is no trapping mechanism. Previous excavation of the site in 1994 yielded less than 0.5 barrels of seep oil to the surface.

5.0 SPILL RESPONSE

The containment strategies to be employed in a possible release are as follows:

5.1 CONTAINMENT AND CAPTURE

The construction of a double-walled cofferdam in the surf zone around the well to isolate it from ocean tides and provide access to the well would provide secondary containment for potential spills or seeps of crude oil. Sea water leaking into the cofferdam would be pumped from inside the well sump area onto storage tanks on the barge (as per mitigation measures in the EIR). An oil water separator may be used to remove any oil and allow for the water to be returned to the ocean if the storage capacity on the barge is insufficient.

5.2 RECOVERY AND CLEANUP

Onsite absorbent pads shall be used as necessary to capture the free seep oil in the double-walled cofferdam containment area. Beach sand that is contaminated with seep oil shall be stored in bins or Baker type tanks and removed by supply boats or stored on the barge. A spill response trailer will be stationed at Lookout Park during the Project. Oil spill vessels shall be stationed offshore, with sufficient boom to respond to any spills, during the Project (as per mitigation measures in the EIR).

5.3 INITIAL RESPONSE ACTIONS

The Contractor (TBD) is responsible for maintaining a 24 hour per day watch for oil spill discharges of any magnitude, or security related issues and shall maintain an onsite spill response team for immediate response in the event of a spill. The onsite response team is responsible for reporting, containment, and clean-up of any spills using onsite equipment and established procedures.

The Contractor shall be required to train all employees working at the Project site in the measures specified in the Oil Spill Contingency Plan, verifying that all employees understand the Spill Response Procedures (detailed below) and that all employees understand who to call in the event of a spill of hazardous materials.
5.4 INITIAL RESPONSE TEAM

The onsite team shall act as primary responders and shall be trained to rapidly and effectively respond to any reported spill. The team shall be supervised by the Contractor Supervising Manager (or other appointed supervisor) and will consist of select employees from with specific training. Offshore response support shall consist of staff and vessels from Cleans Seas, or equivalent, in coordination with the Supervising Manager.

5.5 ONSITE RESPONSE EQUIPMENT

A spill response trailer shall be staged at Lookout Park; additional spill response equipment shall be placed on the barge and on the spill response vessels. Table 4-1 below lists typical response equipment that would be available at the Project site.

<table>
<thead>
<tr>
<th>Table 4-1. Equipment Available Spill Response</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Item</strong></td>
</tr>
<tr>
<td>Sorbent Pads</td>
</tr>
<tr>
<td>30&quot;x 60&quot;x6&quot; Plastic Pans/Tubs or other affected material storage items</td>
</tr>
<tr>
<td>Fuel spill kit</td>
</tr>
<tr>
<td>Weighted Buoy</td>
</tr>
<tr>
<td>Covered Barrels 42 Gallon</td>
</tr>
<tr>
<td>Skiff</td>
</tr>
<tr>
<td>Snare Boom</td>
</tr>
<tr>
<td>Boom Tender Vessel</td>
</tr>
<tr>
<td>Oil Spill Response Vessel</td>
</tr>
</tbody>
</table>

6.0 NOTIFICATIONS

An important step in the response procedure is incident notification. Notification is essential to activate response organizations, alert company management, obtain assistance from and cooperation of agencies, mobilize resources, and comply with local, State and Federal regulations. Notification protocol calls for parties to be contacted first which can render assistance most quickly in controlling or minimizing the impacts of an incident and for those that are less easily accessible or are remote from the incident to be contacted next. The notification process encompasses the following categories:

- Contractor (TBD) notification/onsite spill response team activation;
• Agency notification;
• Cleanup contractors (if required);
• Notification of other interested parties; and
• Periodic progress updates and reports (if necessary).

6.1 COMMUNICATION
Personnel on the barge, onshore and on any response vessel shall be equipped with 2-way communication radios which are tested for effectiveness before construction starts as well as daily.

6.2 NOTIFICATION MATRIX TABLE
The emergency response matrix for the Project is listed below in Table 5-1.
### Table 5-1. Emergency Agency Notification Matrix Table

<table>
<thead>
<tr>
<th>Type of Emergency</th>
<th>Agencies to be Notified</th>
<th>Telephone</th>
<th>Notification Criteria</th>
<th>Timeframe</th>
<th>Information to Report</th>
</tr>
</thead>
<tbody>
<tr>
<td>Oil Spill</td>
<td>California Office of Emergency Services (State Warning Center) *</td>
<td>(800) 852-7550</td>
<td>All spills to water</td>
<td>Immediately</td>
<td>Location of release or threatened release Quantity released</td>
</tr>
<tr>
<td></td>
<td>CUPA/AA</td>
<td>(805)346-8460</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td>National Response Center*</td>
<td>(800) 424-8802</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td>USCG - Santa Barbara</td>
<td>(805) 962-7430</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td>State Lands Commission</td>
<td>(562) 590-5201</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td>California Division of Oil and Gas</td>
<td>(805) 937-7246</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td>California Department of Fish and Wildlife</td>
<td>(916) 445-0045</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td>Santa Barbara County of Emergency Management</td>
<td>(805) 681-5526</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td>Tribal Notification as per CSLC Tribal Consultation Policy.</td>
<td>(916) 373-3710</td>
<td>All spills</td>
<td>Within 48 hrs</td>
<td>Location of release or threatened release Quantity released</td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Medical Emergency</td>
<td>Fire Department/ Ambulance</td>
<td>911</td>
<td>Medical assistance and / or transport required</td>
<td>ASAP</td>
<td>Type of injury Location Condition Action taken No. of victims</td>
</tr>
<tr>
<td></td>
<td>Cal OSHA (Call local # first)</td>
<td>(805) 654-4581 (415) 737-2932</td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

*Notification to NRC may be accomplished by calling the State Warning Center and requesting that they notify NRC.

Oiled Wildlife Care Network: (877) 823-6926
Abbreviations used: CUPA= Certified Unified Program Agency; USCG = U.S. Coast Guard; OSPR = Office of Oil Spill Prevention and Response; CalOSHA = California Occupational Safety and Health Administration

### 6.3 AGENCY NOTIFICATIONS

The Lempert-Keene Seastrand Oil Spill Prevention and Response Act (SB 2040) requires notification of the California Office of Emergency Services when oil spills occur or when there is a threat of occurrence from facilities, vessels, or pipelines into
California marine waters. The California Code of Regulations implementing SB 2040 requires that specific information relevant to such spills is given to the appropriate agencies (see Table 5-2 below) when making notifications.

All actions, including agency notification, shall be recorded on the Event Log. A regulatory agency address directory is provided in the Table 5-2 below.

Table 5-2. Regulatory Agencies

<table>
<thead>
<tr>
<th>Regulatory Agency Contact Addresses</th>
<th>California Office of Emergency Services</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>National Response Center</strong></td>
<td>2800 Meadowview Road</td>
</tr>
<tr>
<td>US Coast Guard Headquarters</td>
<td>Sacramento, CA 95832</td>
</tr>
<tr>
<td>2100 Second Street SW</td>
<td></td>
</tr>
<tr>
<td>Washington, DC 20593</td>
<td></td>
</tr>
<tr>
<td><strong>BSEE</strong></td>
<td></td>
</tr>
<tr>
<td>Pacific OCS Regional Office</td>
<td></td>
</tr>
<tr>
<td>&amp; Camarillo District Office</td>
<td></td>
</tr>
<tr>
<td>760 Paseo Camarillo, Suite 102</td>
<td></td>
</tr>
<tr>
<td>Camarillo, CA 93010</td>
<td></td>
</tr>
<tr>
<td><strong>California Division of Safety and Health</strong></td>
<td>2100 East Katella, Suite 140</td>
</tr>
<tr>
<td>Commander U.S. Coast Guard Sector LA/LB</td>
<td>Anaheim, CA 92806</td>
</tr>
<tr>
<td>1001 S Seaside Ave</td>
<td></td>
</tr>
<tr>
<td>San Pedro, CA 90731</td>
<td></td>
</tr>
<tr>
<td><strong>U.S. Coast Guard</strong></td>
<td></td>
</tr>
<tr>
<td>Commander U.S. Coast Guard Sector LA/LB</td>
<td>200 Oceangate, 12th Floor</td>
</tr>
<tr>
<td>1515 West 190th Street, Suite 555</td>
<td>Long Beach Office</td>
</tr>
<tr>
<td>Gardena, CA 90248</td>
<td>200 Oceangate, 12th Floor</td>
</tr>
<tr>
<td><strong>State Lands Commission</strong></td>
<td></td>
</tr>
<tr>
<td>Long Beach Office</td>
<td></td>
</tr>
<tr>
<td>501 West Ocean Boulevard, Suite 4200</td>
<td>5075 South Bradley Road, Suite 221</td>
</tr>
<tr>
<td>Long Beach, CA 90802</td>
<td>Santa Maria Office</td>
</tr>
<tr>
<td><strong>California Division of Oil and Gas</strong></td>
<td>1700 K Street,</td>
</tr>
<tr>
<td>501 West Ocean Boulevard, Suite 4200</td>
<td>Sacramento, CA 95811-4037</td>
</tr>
<tr>
<td>Gardena, CA 90248</td>
<td></td>
</tr>
<tr>
<td><strong>California Department of Fish and Wildlife/ OSPR</strong></td>
<td></td>
</tr>
<tr>
<td>1700 K Street,</td>
<td></td>
</tr>
<tr>
<td>Sacramento, CA 95811-4037</td>
<td></td>
</tr>
</tbody>
</table>

The California Office of Emergency Services and the National Response Center provide additional agency notifications since they also notify related State and Federal agencies.

If a spill impacts navigable waters, notification of the National Response Center is mandatory and normally results in simultaneous notification of the US Coast Guard. However, it is recommended that a call be made to the local U.S. Coast Guard office in Santa Barbara at (805) 962-7430 to expedite their response. If the local U.S. Coast Guard office is unable to be reached, the office in Long Beach at (562) 980-4444 shall be contacted instead.
6.4 EMERGENCY INFORMATION CHECKLIST

An example of an information checklist is provided in Table 5-3 below.

Table 5-3. Information Checklist Information

<table>
<thead>
<tr>
<th>Emergency Information Checklist Items</th>
</tr>
</thead>
<tbody>
<tr>
<td>1. Name of Reporter</td>
</tr>
<tr>
<td>2. Facility Name and Location (Summerland Beach) GPS coordinates</td>
</tr>
<tr>
<td>3. Date and Time of Spill</td>
</tr>
<tr>
<td>4. Cause (if known - (do NOT speculate)) and Location of Spill</td>
</tr>
<tr>
<td>5. Estimate of the volume of oil, or contaminant, spilled and the volume at immediate risk of spillage</td>
</tr>
<tr>
<td>6. Material spilled (e.g., crude oil) and any inhalation hazards or explosive vapor hazards, if known</td>
</tr>
<tr>
<td>7. Prevailing Sea Conditions:</td>
</tr>
<tr>
<td>• Wave Height</td>
</tr>
<tr>
<td>• Size and Appearance</td>
</tr>
<tr>
<td>• Direction of slick movement</td>
</tr>
<tr>
<td>• Speed of Movement, if known</td>
</tr>
<tr>
<td>8. Prevailing Meteorological Conditions:</td>
</tr>
<tr>
<td>• Wind Speed</td>
</tr>
<tr>
<td>• Wind Direction</td>
</tr>
<tr>
<td>• Air Temperature</td>
</tr>
<tr>
<td>9. Measures Taken or Planned by Personnel on Scene:</td>
</tr>
<tr>
<td>• For containment</td>
</tr>
<tr>
<td>• For cleanup</td>
</tr>
<tr>
<td>10. Current condition of the facility</td>
</tr>
<tr>
<td>11. Any Casualties</td>
</tr>
<tr>
<td>12. Additional information if available: chemical name, health effects, medical advice actions taken from the State.</td>
</tr>
</tbody>
</table>

NOTE: When making reports, record the agency, name of person contacted, and the date and time of notification. Reporting of a spill shall NOT be delayed solely to gather all the information noted above.

7.0 SPILL SCENARIOS

This section provides examples of potential spill scenarios along with associated spill response procedures.

7.1 GENERAL SPILL SCENARIO

The following procedures provide general guidelines to respond to a spill.
Close valve or shovel a dike to contain leaking material.
Set traffic cones to keep traffic out of spill area.
Spread absorptive pads to soak up and contain spill.
If spill cannot be contained, evacuate area and call Hazardous Spill Response Center for assistance.
Contractor response trained representative shall survey the spill and determine the extent of the spill and any special materials needed for cleaning.
The Site Superintendent shall record the time, location, type of spilled material, estimated amount of spill, the methods employed to clean the spill, deposition of the reclaimed material and absorptive materials and the name of the person making the notations.
Cleanup shall continue without interruption until it is completed to the satisfaction of the CSLC staff onsite. No attempt shall be made to resume work in the affected area until cleanup is completed.
Disposal of the absorbent pads and other absorptive material (as necessary) shall be placed in disposal bags prior to calling Waste Management Special Waste Services.
Contaminated soils shall be placed in barrels or specialized lined containers for hauling larger amounts and delivered to Waste Management's Special Waste Facility. Replacement of spill kit materials shall be obtained through Waste Management Special Waste Services.
Appropriate spill response materials to be available on site in the spill cleanup kit stated above and shall include fuel resistant gloves, eye protection, absorbent pads, boom, kitty litter, 30-gallon plastic bags, a "non-sparking" shovel, plastic sheeting, and one 55-gallon open top drum.

7.2 ONSHORE SPILL SCENARIO - MINOR OIL SPILL

This scenario consists of spillage of seep oil or seep oily water onto the beach. Response shall consist of deployment of sorbent pads stored on site. The list below provides response procedures for a minor onshore spill.

- Account for all personnel and ensure their safety;
- Determine if there is a threat of fire or explosion. If a threat of fire or explosion exists, suspend all control and/or response operations until the threat is eliminated;
- Assess the spill size and type of material spilled;
- Take action to contain the spill and prevent further spillage;
- Place contaminated beach sand back into excavation site (if applicable);
• Inform the Project Superintendent as soon as possible as to the source of the spill, type of material spilled and status of control operations;
• Mobile containment of spill on the beach using sand berms, if possible;
• Maintain surveillance of source; and
• Assist the onsite response team in implementing clean-up procedures including use of sorbent pads and proper storage and disposal of oily debris and sorbent pads.

7.3 FUELING OPERATIONS/FUEL STAGING AREA

All refueling activities shall take place on the barge and occur within areas with secondary containment and storage for any spilled material. The following procedures provide response guidelines for addressing a spill from fueling operations.

• Stop operations immediately.
• Account for all personnel and ensure their safety;
• Determine if there is a threat of fire or explosion. If a threat of fire or explosion exists, suspend all control and/or response operations until the threat is eliminated;
• Notify the "person in charge," the Hazardous Spill Response Center, California State Lands Commission, and the California Governor's Office of Emergency Services.
• Assess the hazard. If the spill cannot be safely and effectively controlled, direct safe evacuation of the area, and stand by for Hazardous Spill Response Center direction.
• If the spill were to be incidental and could be safely and effectively controlled by the Contractor’s personnel, the following shall occur:
  o Secure the Area;
  o Obtain appropriate spill response equipment and personal protective equipment;
  o Identify the source of the release. Determine the origin of the release: Is the release from a leaking fuel tank? A ruptured hydraulic hose? An overfilled fuel tank?
  o Shut off source / shut off equipment. If the release occurred because of fueling operations, turn off the fuel source. If the release occurred due to faulty equipment, make sure equipment is turned off;
  o Contain the spill;
  o Contain the spill using appropriate spill response equipment provided in the on-site spill response kit;
o Protect Sensitive Areas;
o Ensure that the barge sump are is properly maintained and capable of containing the spill; and
o If there are catch basins in the vicinity of the fuel staging areas, the Contractor shall install drain protectors at the catch basins if they are not already installed.

- Clean-up the Spill: The contaminated materials shall be collected and disposed of in Department of Transportation (DOT) approved containers, if the amount of contaminated soil exceeds the volume of the 55-gallon spill kits.
- The Contractor shall notify the appropriate local, State, and / or Federal agencies of any reportable release.

7.4 OFFSHORE SPILL

An oil spill response contractor, such as Clean Seas, shall provide oil spill response for any spilled material that reaches ocean waters. Onsite response equipment may include the following:

- Containment booms.
- Oil water skimmers.
- Floating storage bags.
- Spill specific support vessels.

This scenario consists of spillage of oil or oily water into the ocean. Response will consist of deployment of an absorbent boom and sorbent pads stored on the Barge or on the response vessels. The following lists response procedures for an offshore spill.

- Account for all personnel and ensure their safety;
- Determine if there is a threat of fire or explosion. If a threat of fire or explosion exists, suspend all control and/or response operations until the threat is eliminated;
- Assess the spill size and type of material spilled;
- Notify Clean Seas, or equivalent, response vessels;
- Take action to contain the spill and prevent further spillage;
- Assess the spill situation to determine the status of response operations, estimate spill volume, estimate speed and direction of oil slick movement and determine resource needs;
- Inform the project superintendent as soon as possible as to the source of the spill, type of material spilled and status of control operations;
- Maintain surveillance of source and oil slick;
• Assist the onsite response team in implementing clean up procedures including deployment of the absorbent boom and sorbent pads and proper storage and disposal of oily debris and sorbent pads;

8.0 PROTECTION OF THE ENVIRONMENT FROM PROJECT WASTE

Disposal of Solid Wastes

Solid wastes, including sanitary wastes, rubbish, debris, waste materials, garbage and other discarded materials shall be placed in containers and disposed of on a regular schedule through the duration of the Project. All handling and disposal shall be conducted to prevent spillage and contamination. Contractor shall transport all solid waste off all construction sites and staging areas and dispose of it in compliance with Federal, State, and local requirements for solid waste disposal.

Waste Generated and Diverted

The total amount of waste generated and diverted would be seep oil soaked materials and PPE disposable protective gear.

Disposal of Contractor Generated Hazardous Waste

Hazardous waste shall be removed from the Project site at the time of Project completion.

Procedures Employed to Determine Appropriate Waste Management

The Contractor could produce hazardous waste from the Project due to the collection of contaminated sands and oily water. These wastes will be collected in tanks and bins and transported off of the barge on the supply vessels. However, for all wastes which are generated related to spill situations, the Project superintendent shall be responsible for waste management on-site and shall fill out a Hazardous Waste Determination Form.

Sampling Analysis Plan

The best way to sample/analyze any waste is to profile it in a lab prior to disposal. The Hazardous Waste Determination Form shall be completed with the data gathered during sampling.

Methods of Hazardous Waste Accumulation

Hazardous wastes shall be stored in corrosion resistant containers, removed from the work area and disposed of in accordance with Federal, State, local regulations. The Contractor shall separate hazardous waste from other materials and wastes and shall
protect it from the weather by placing it in a safe covered location as precautionary measures against accidental spillage. Any contaminated sands shall be covered when not being activity managed (as per EIR mitigation measures).

Management Procedures for Accumulation, Labeling, Containerization, Transportation and Ultimate Disposal of Hazardous Waste

After Completing the Hazardous Waste Determination Form, waste shall be labeled immediately and shall be transported off-site by local waste management specialists equipped for proper transport and disposal of materials.


The Contractor shall follow all Federal, State, local, and USACE regulations including 40 CFR 268 regarding hazardous waste disposal at landfills and provide proper documentation at all times.

Management Procedures for Recycling Hazardous Materials

All recyclable hazardous materials shall be recycled by certified professionals only. The Contractor shall never put recyclable materials in a landfill and shall only turn materials over to legally recognized recycling professionals as applicable.

Used Oil Management Procedures in Accordance with 40 CFR 279

The Contractor shall identify employees involved in fuel and lubricant activities and provide them with appropriate training in the following areas:

- innovation;
- handling and storage (fuels, lubricants, waste oil, and any other regulated substances shall be stored in above ground tanks only);
- integrate fuel efficiency as a requirement for all equipment types during the equipment life cycle, including requirements definition, the MA&S process and operations;
- place all drained lubricants, fuels, etc. in closed containers. Remove them from the site for disposal or recycling according to State and Federal regulations;
- continuous improvement; and
- interoperability.

Pollution Prevention/Hazardous Waste Minimization Procedures

The Contractor shall comply with all State and Federal recycling and waste minimization programs.
Contractor employees shall be directed to recycle glass bottles, aluminum cans and paper products that have been brought to the construction site for personnel consumption or delivery packaging systems. This solid/hazardous waste material shall be dumped per State and City Laws.

*Plans for Disposition of Hazardous Waste by Permitted Facilities*

The Contractor shall schedule regular pick-up dates by local waste management facilities prepared to dispose of hazardous wastes in accordance with the Code of Federal Regulations (CFR).

*Procedures to be Employed to Ensure all Employee Training Records are to be Maintained.*

The Contractor maintains all employee training records for verification purposes. For this reason, should any questions arise as to the training of any employee, ALL records can easily be verified. On-site training sessions, such as tool box safety meetings, shall also be available at the job-site for all attendees.