



3500 Sunrise Highway, Building 200, Suite 200
Great River, NY 11739 U.S.
P 631.224.9141 F 631.224.9082

PROPOSAL

National Response Corporation (NRC)
Emergency Response Resources

MARCH 26, 2021



Virgin Islands
WATER AND POWER AUTHORITY

Prepared for:

Virgin Islands Water and Power Authority
P.O. Box 1450
St. Thomas, USVI

2021 Emergency Response RFP - PR-11-21

Prepared by: Deborah Wick
Director of Client Services

A. Introduction and Executive Summary



National Response Corporation (NRC) is pleased to present the following proposal to Virgin Islands Water and Power Authority (VIWAPA) demonstrating our qualifications and capabilities for Oil Spill Response and Compliance services for VIWAPA's power generation facilities in St. Thomas, St. Croix, and St. John, U.S. Virgin Islands. NRC has been privileged to service VIWAPA since 1997 and look forward to continuing our good relations and services to your company if awarded the PR-11-21 tender offering.

This proposal has been developed to provide VIWAPA with the highest level of response capability to service its power generating facilities and to ensure full compliance with all federal and state requirements, including the US Coast Guard, Environmental Protection Agency (EPA), and Virgin Islands Department of Planning and Natural Resources (DPNR) regulatory requirements throughout your areas of service. Our proposal also includes support for VIWAPA Hazwoper, Incident Command System (ICS), and Preparedness for Response Exercise Program (PREP) requirements.

NRC understands that VIWAPA's scope of work includes coverage for VIWAPA's St. Croix Estate Richmond Facility with a Worst Case Discharge (WCD) capability of 2,230,532 gallons of oil; the Randolph Harley Facility on St. Thomas with a WCD capacity of 2,268,000 gallons; and the St. John Emergency facility in Cruz Bay and Coral Bay with 500 gallons of oil discharge capacity. NRC's expansive presence in the Virgin Islands and Puerto Rico, with Tier 1 and Tier 2 response bases in St. Croix and Puerto Rico, along with our nationwide footprint in the continental U.S. with capacity to rapidly provide an additional Tier 3 response resources in the event of a major oil spill or natural disaster in the VI; makes our company strongly suited to service VIWAPA.

As one of the environmental industry's most reputable and trusted firms, NRC has unsurpassed experience and excellence in service, preparedness, and response to oil spill and hazardous material (HAZMAT) incidents in the Virgin Islands and Puerto Rico and across the globe. We tailor our services to meet specific client requirements while delivering a recognized and proven standard of excellence. As a nationally recognized Oil Spill Removal Organization (OSRO), NRC is committed to providing VIWAPA with the highest quality service across a full spectrum of response services, including supervisory personnel, labor, equipment, and materials in order to mitigate any emergency or multiple emergencies at VIWAPA facilities. NRC response teams are available to manage all levels of response actions: from the initial deployment of equipment to the site, the containment of the release and recovery of product or waste, to the final cleanup operations including, decontamination, remediation, and transportation of waste materials. With a large

response presence in the Virgin Islands and Puerto Rico, NRC is uniquely qualified to provide activation of response resources upon notification meeting VIWAPA's expectation that response resources will be deployed within three (3) to six (6) hours of notification. If of interest, NRC can discuss the placement of some initial response kits at VIWAPA facilities in order to ensure a more rapid response to any spill emergency. Our response procedures to any VIWAPA response incident will be more fully details in this proposal.

Further, NRC can also provide assistance during natural disasters and has been instrumental in providing the delivery of relief packages and emergency response over the past few years in both the Virgin Islands and wider Caribbean area during some of the more recent hurricanes and severe storms in the region.

NRC will provide VIWAPA with full regulatory response compliance. We have reviewed VIWAPA's Professional General Contract Terms and have provided some comments and suggested modifications for your consideration in a separate document attached to this proposal addressing the general conditions. NRC is currently working under VIWAPA agreed to contract and it is our hope that a new agreement will recognize similar agreed to terms.

For this proposal, please note the following primary NRC contacts who will act as primary contract and primary response manager contacts for work with VIWAPA facilities:

Primary Contract Administration

Deborah Wick

Director of Client Services

dwick@nrcc.com

516 658-7358 cell (preferred)

Primary Response Manager

David Aviles

daviles@nrcc.com

787 396-5231

NRC's goal is to continue our long-term strategic partnership with VIWAPA. We believe a strong strategic partnership will provide your company with predictable costs for both existing and future growth opportunities, while benefiting from the security of retaining a reliable national response organization.

NRC will continue to work closely with your environmental team to ensure a comprehensive oil spill preparedness program is in place to respond to any VIWAPA response event. As we look to the future, NRC is eager to enhance our response readiness and to work closely with VIWAPA to ensure the highest quality and most cost-effective response organization and training for your company. This proposal will be valid for a period of ninety (90) days from submission of the proposal.

B. Company Overview

NRC is a leading national provider of environmental, industrial, and emergency response services with operations in the US. Headquartered in Great River, New York. As of November 2019, NRC is proudly part of the US Ecology (USE) group of companies across the US, Mexico, and Canada. NRC is wholly owned by US Ecology but continues to operate under the name of National Response Corporation. Any Agreement with VIWAPA will be under National Response Corporation. A US Ecology and NRC organization chart is provided with this proposal as supporting documentation.

US Ecology is a leading North American provider of environmental and Waste Management facilities, including the operation of 42 treatment, disposal, and recycling facilities. Together, US Ecology and NRC offer a complete service line of emergency response, remediation, industrial, and waste management services on both marine and land events. We offer an extensive variable resume of successful projects and services for the energy and oil and gas industry.

Established in 1992, NRC started as an oil spill response provider following the introduction of the 1990 Oil Pollution Act, 'OPA 90'. Through strategic acquisitions and organic growth, our service lines have since expanded to cover a wide range of industrial and remediation services as well as training, consultancy, and specialized response services. In addition, under USE, we can provide a wide range of waste disposal, transportation, and waste management services. Our focus to VIWAPA will be to provide a highly responsive local service with the highest quality safety standards, modern efficient equipment and dedicated professional employees.

NRC is the largest commercial OSRO in the United States and Internationally with an unyielding commitment to the most stringent operational and safety standards. NRC holds United States Coast Guard (USCG) OSRO Classifications MM, W1, W2, and W3, the highest classification available and recognized under all federal oil spill response agencies, in all US regulatory operating environments in both coastal and inland regions. Since its inception, NRC has responded to more major spills than any other national OSRO.

As a national OSRO, NRC is well suited to provide regulatory compliance to VIWAPA to meet and exceed all USCG, EPA, and DPNR compliance requirements. NRC's operational footprint as a national OSRO will ensure that our vast response resources will assist VIWAPA in meeting its commitment to have a response organization, personnel and response resources in your geographic response zones prepared to respond to any VIWAPA oil spill or natural disaster event. Our response resources and highly trained and experienced personnel enable us to prepare, respond, and perform complex projects with the best resources available.

Global and Domestic Locations

While US Ecology's headquarters is in Boise, Idaho; NRC will continue to operate as National Response Corporation with our home office in Great River, New York. NRC and US Ecology now maintain over 160 operating offices and facilities across the United States and USVI. NRC/USE is well positioned to service VIWAPA in all of its operating areas and, with immediate and direct support from our Virgin Islands and Puerto Rico assets, we can assist with incidents in all VIWAPA's V.I. locations.

As an Oil Spill Response Organization with the broadest offering of global service to over 7,000 customers, US Ecology/NRC has a proven track record of delivering end-to-end preparedness, response, remediation, and waste management solutions even under the most challenging conditions.

Our experienced response teams are in the forefront of managing catastrophic events and absolutely committed to providing cost effective solutions that meet our customer's environmental needs and regulatory obligations, while maintaining the highest safety standards. Our staff of over 4,000 personnel operate from over 160 office locations in 13 countries.

NRC provides emergency and environmental services to more than 15,000 tank and non-tank vessels and an additional 2,000 barges. We cover approximately 700 assorted facilities, refineries and pipelines, as well as railroad companies, power plants and airport fuel farms around the world.



NRC has developed a database system to identify emergency response and hazardous material resources globally. Personnel, materials, equipment, capabilities, and services are incorporated into this database and can be immediately accessed from the office or in the field.

US Ecology/NRC owns a vast array of strategically pre-positioned equipment throughout our areas of service globally. Our resource inventory includes: Oil Spill Response Vessels (OSRV), Oil Spill Response Barges (OSRB), shallow water portable barge sets, high-capacity skimming systems, ocean and inland boom, inland work boats, vacuum transfer units, and mobile communications centers. In addition, through NRC's Marine Resource Network, clients have access to a vessel fleet of more than 2,000 offshore vessels and supply boats worldwide.

US Ecology/NRC & Independent Contractor Network (ICN)

USE/NRC is supported by 130+ ICN members based in over 550 locations throughout our areas of operation and maintains contractual agreements with every member of our ICN. We develop and train our ICN members to ensure the continuous availability of resources to support our clients' response needs. Through this unique system of strategically pre-positioned personnel and equipment, NRC can assemble, at a very rapid rate, a highly trained response force, which is prepared to handle any spill emergency.

In the Virgin Islands, NRC works with the following ICN contractors:

All Environmental Services Inc. - Port of Ponce, Puerto Rico.
Clean Harbors Caribe - Cataño, Puerto Rico
San Juan Towing Waterfront Services, San Juan, Puerto Rico
Cotton – Guaynabo, Puerto Rico
Indutech – Salinas, Puerto Rico
Marine Diving contractors, Arecibo, Puerto Rico
Vivot Equipment Contractors – St. Croix, USVI
National Industrial Services LLC (NIS) – St. Croix, USVI
VI Waste Regulated Management – St. Croix, USVI

While emergency response and time critical work will be conducted primarily with NRC personnel, equipment, and materials, qualified firms, including our local VI and Puerto Rico ICN members, will be used as needed to provide support services and other resources as is expedient for NRC and VIWAPA. Our ICN subcontractors will work under the responsibility and supervision of NRC personnel. Prime subcontractors are capable of rendering emergency response services to hazardous materials incidents in a stand-alone capacity, while other subcontractors used generally involve commercial utility location services, transportation, waste disposal, specialty abatement services, recycling services, equipment rental, temporary housing, consultation, paving, and other support work. These vendors and subcontractors will be managed under the direction of NRC personnel. NRC will maintain responsibility and accountability for the performance of all subcontractors.

Should VIWAPA require a specific type of service provider that is not currently in our network, we will work with your company to identify these needs and work to obtain an agreement with those service providers. We do this as an added service at no additional cost to VIWAPA, to ensure that any perceived gaps can be filled.

NRC and ICN Locations Nationwide:



C. Scope of Work

1.1 NRC USCG OSRO Classification

Qualifications and Capabilities

NRC is one of the few OSROs to maintain full USCG OSRO Classification including Non-Floating Oil and Aerial Dispersant Classification - approved by the USCG to respond to NFO or Group V (heavy sinking) oils and in coordination with the USCG's Dispersant Mission Planner 2 (DMP2) Calculator for approved areas. Attached to this proposal is NRC's USCG OSRO Classification Approval letter (2004 is still valid), USCG Non-Floating Oil Approval Letter and 2021 Dispersant Classification Approval letter.

OSRO Classification

NRC maintains the highest USCG OSRO classification rating in the requisite U.S. Captain of the Port Zones. As such, we will provide VIWAPA with MMPD through Worst Case Discharge Tier 3 Oil Pollution Act 1990 (OPA 90) compliance to fulfill your regulatory requirements for contracted response resources in accordance with EPA and USCG OSRO classification guidelines for all USCG operating environments, including Rivers/Canals, Great Lakes, Inland, Nearshore, Offshore and Open Ocean operating environments. Below is NRC's full USCG OSRO Classification Listing for the COTP Zone District 7 for San Juan and St. Croix:

COTP Zone: San Juan - DISTRICT 7

OSRO Name: NRC/US ecology -#16								
Operating Environment	Facility MMPD	Facility WCD1	Facility WCD2	Facility WCD3	Vessel MMPD	Vessel WCD1	Vessel WCD2	Vessel WCD3
River or Canal	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes
Inland	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes
Ocean	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes
Near Shore	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes
Off Shore	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes

COTP Zone: San Juan(St. Croix) - DISTRICT 7 - High Volume Port

OSRO Name: NRC/US ecology -#16								
Operating Environment	Facility MMPD	Facility WCD1	Facility WCD2	Facility WCD3	Vessel MMPD	Vessel WCD1	Vessel WCD2	Vessel WCD3
River or Canal	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes
Inland	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes
Ocean	~	~	Yes	Yes	Yes	Yes	Yes	Yes
Near Shore	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes
Off Shore	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes

As part of NRC's regulatory compliance to VIWAPA, we will provide the following enhanced regulatory preparedness:

- Full EPA and USCG OSRO Classification in all VIWAPA operating areas, including
 - USCG OSRO Dispersant Classification
 - USCG OSRO Non-Floating Oil Classification
- Maximum Most Probable Discharge (MMPD) through Worst Case Discharge (WCD) Tier 3 > 300,000 gallons and identification of resources to meet WCD planning requirements
- Ensure activation within 3 to 6 hours for all VIWAPA facilities
- Ensure response within 6 hours for High Volume Areas and 12 hours of all other operating areas
- Assist with pre-identified assets for response to VIWAPA operating areas
- Strong knowledge of NCP and ACP (Area Contingency Plans)
- Assistance with PREP (Preparedness for Response Exercise Program)
- Support and/or Facilitation for Drills & Exercises

NRC exceeds the USCG OSRO Classification response equipment capability thresholds for Protection, Containment, Effective Daily Recovery (EDRC), and Temporary Storage Capacity (TSC). Further, NRC exceeds the response timeframe thresholds for Maximum Most Probable Discharge

(MMPD), Worst Case Discharge (WCD) Tier 1, Tier 2, and Tier 3 in all VIWAPA operating environments – Inland, Near Shore, Offshore, and Open Ocean.

Please see the attached **Appendix A**, NRC Equipment Listing, which list all NRC and contracted equipment located in the USVI and Puerto Rico and that could be deployed to a VIWAPA spill incident. The attached **Appendix B**, Resource Cascade Summary, identifies NRC response resources that could be mobilized within six (6) to seventy-two (72) hours to St. Croix, USVI. Please note that the Appendix B report does not include time for mobilization or sea/air transit times. The Cascade Summary is an example and indication of the additional response resources that could be mobilized in the event of a large spill incident at VIWAPA.

1.2 – NRC Response to a Worst Case Discharge at VIWAPA Facilities

NRC will provide VIWAPA with OPA 90 OSRO regulatory compliance to meet VIWAPA's Maximum Most Probable Discharge (MMPD) to Worst Case Discharge (WCD) requirements for the St. Croix Estate Richmond Facility with a WCD capability of 2,230,532 gallons of oil; the Randolph Harley Facility on St. Thomas with a WCD capacity of 2,268,000 gallons; and the St. John Emergency facility in Cruz Bay and Coral Bay with 500 gallons of oil discharge capacity.

NRC's expansive presence in the Virgin Islands and Puerto Rico, with Tier 1 and Tier 2 response bases in St. Croix and Puerto Rico, along with our nationwide footprint in the continental U.S. with capacity to rapidly provide an additional Tier 3 response resources in the event of a major oil spill or natural disaster in the VI; makes our company strongly suited to service VIWAPA.

For your reference, attached in our supporting documentation is a list of NRC response equipment resources located in the USVI and Puerto Rico. This list represents both NRC owned and contracted equipment. NRC has more than sufficient resources to mitigate a large discharge at VIWAPA facilities. Should a catastrophic spill incident occur, NRC would rapidly activate its Tier 3 resources that could be airlifted or sent by sea to the Virgin Islands. For this purpose, we have included in our Supporting documentation a Cascade Resource Summary of additional resources that could be sent to the USVI in the event of a Tier 3 response incident.

We provide here an example of response and approximate costs to a WCD event at VIWAPA's Estate Richmond facility in St. Croix. We note that it is difficult to predict the cost of a spill incident as each incident can vary depending on the amount of product spilled, weather, and specific circumstances at the time of the event. The following example is meant to show the approximate response based on the discharge and under normal or general circumstances. Due to the location of NRC's response base on St. Croix, it is expected that the initial response time for this location would be approximate three to six hours.

Additional response scenarios for VIWAPA St. Thomas and St. John are included in our supporting documents.

Worst Case Discharge

2,230,532 Gallons Spilled, VIWAPA St Croix USVI

Location: Estate Richmond Facility, St CroixResponse Activities:**Fuel Oil Storage Tank**

- 2,230,532 gallons spill at the facility with adequate secondary containment.
- Mobilize within 3 to 6 hours of notification.
- Facility will deploy owned containment boom for pier and intakes.
- NRC STX, VIVOT, NIS, VI Regulated Waste would be activated for initial response of personnel and equipment.
- Vac trucks and storage tanks are available from our ICN network.
- NRC has a stockpile of equipment in St. Croix at LTB Terminals including skimmers (high capacity, other), consumables (absorbents), PPE, portable Temp storage.
- If necessary and beyond the capability of the local ICN, additional NRC personnel from PR and US Mainland could be activated. PR ICN's consist of All Environmental and Clean Harbors. NRC would deploy various deflection booms dependent on the tides, currents, and weather at the time of an incident.
- Waste handling can be performed by ICN personnel utilizing Clean Harbors, All Environmental or VI Regulated.

Resources:

- 30 personnel x 1500 per person = \$45,000
- 4 response boats at 1200 per day they are different sizes= \$4,800
- 1 OSRV 110' for Offshore Support (2,000 feet of 42" ocean boom & 2 skimming systems) with lubes, fuel and captain and 1 mate = \$20,000 per day
- 1 OSRB Temporary Storage Barge \$12,400 per day + towing cost, based on charter hire rates at the time of hire
- 5 oil skimmers x 1000 per day = \$5,000
- 2 Portable Barge sets 11800x2 = \$3,600
- 5,000 feet of nearshore containment boom 18inch to 21 inch x2 dollars per ft = \$10,000

Total estimated costs: \$100,800 per day

Approximate Costs:

- Air mobilization = 30 X \$150 = \$4,500 x 2 = \$9,000 - Commercial or charter one way
- Hotels \$250 per night (2 to a room), 30 personnel - \$7,000
- Car rental \$70/day x 7 cars - \$500 / day

Estimated Mobilization and Lodging: \$16,500 / day estimated 30 persons.

Note: Actual cost will be based on current USE/NRC Price List Time and Material Rate Schedule

1.3 Initial Response and Booming Strategies:

For a response in St. Croix, St. Thomas, or St. John, it is expected that VIWAPA facility personnel would commence an initial response. Upon activation, NRC would rapidly mobilize personnel and response equipment, including containment boom, absorbents, skimmers, work boats and our Oil Spill Response Vessel if needed. NRC supervisory and responder personnel would activate from our St. Croix response base along with additional subcontractor personnel and equipment from St. Croix, St. Thomas, or Puerto Rico locations as needed.

For an incident in St Thomas, NRC would activate Playland Marine for additional personnel and work boats. Playland would also mobilize NRC's two response equipment trailers, which contain 2,000 ft of 18-inch containment boom absorbents, PPE, tools, bladder, pillow tanks and a drum skimmer and compressor. In St. Croix, NRC response equipment and personnel would rapidly be activated from our base of operations at the Limetree Bay Terminal.

Booming strategies will consider best practices to protect nearby sensitive sights, local beaches, marinas and VIWAPA facilities. In general, it is understood that VIWAPA would initially deploy its onsite boom to protect its intakes and to contain the spilled product near the dock facilities. Upon activation in St. Thomas, NRC would immediately activate its contractor Playland Marine, to deploy both boom and vessels to contain any product in Kum Bay. Additional boom would be deployed as deflection to protect needed areas within the harbor.

For response activities at the Estate Richmond facility, VIWAPA personnel will initiate initial actions by deploying their boom reel with containment boom at the dock and to protect facility intakes. Response strategies have shown that spilled oil from this facility will most likely free float toward Christiansted Harbor and nearby beaches. Response in this area will be focused on protecting sensitive sights, beach areas, marinas and VIWAPA facility.

1.4 Response Project Management Support

We believe that NRC is strongly situated to provide VIWAPA with emergency response and project management support. NRC response managers are some of the most experienced responders in the industry. We know that the key to a cost-effective response is the ability to quickly transition from the initial emergency response phase to the project management of the event. This strategy has proven successful in both minimizing the impact to the environment and to providing tight cost controls for our clients. Costs associated with a major spill can be significant. Therefore, it is critical to have the most experienced team possible to coordinate and manage both the response and the physical resources needed to perform the cleanup. Our focus will be to work closely with your spill management team, keep you informed of the cleanup progress, provide daily cost projections, and to continuously provide the most experienced guidance throughout the emergency and management stages of an event.

1.5 Key Staffing from St. Croix, USVI

On-duty Response Supervisors are on call during 24/7 along with Cleanup/Response Technicians. A series of on-call support call-out lists of Response Managers, Supervisors, Technicians, standby

crew members, and specialized task subcontractors and vendors are maintained for each on-duty Supervisor. If needed, further support is available from NRC's resources inventory. Below is a list of Key personnel from our St. Croix base along with additional supervisory personnel from our home office in New York.

David Aviles	Caribbean Regional Manager	San Juan, Puerto Rico
Christian Herold	Operations Manager	St. Croix, USVI
Leeland Chapman	Vessel Manager	St. Croix, USVI
Luis Figueroa	Assistant Vessel Manager	St. Croix, USVI
Jonathan Santiago	Marine Tech	St. Croix, USVI
Demir Aksehirli	Director Support Services	Great River, NY
Ray McCoy	Director of Operations	Great River, NY
Chris Eilers	Logistics Manager	Great River, NY

1.6 PPE and TWIC Certifications

PPE - All NRC and ICN subcontractors will be issued appropriate Personal Protective Equipment (PPE) to minimize exposure to hazards and hazardous materials. NRC strictly follows OSHA standards for personnel responding to oil or other hazardous material spill events. Typically, responders will be provided PPE such as:

- Head and scalp protection
- Respiratory protection
- Eye protection
- Hearing protection
- Hand and arm protection
- Foot and leg protection
- Body protection
- Height and access protection

TWIC – Transportation Worker Identification Credential (TWIC) are required for personnel requiring unescorted access to secure areas of Marine Transportation Security Act (MTSA) facilities and vessels. All Key Personnel deployed to a spill event have TWIC credentials. Non-essential personnel not required to have TWIC credentials will be escorted by assigned personnel who have TWIC credentials.

1.7 24 Hour / 365 Emergency Response Capability

NRC's International Operations Center (IOC) will provide VIWAPA with a "One Call" response activation system through this emergency call center manned twenty-four hours per day, seven days a week and capable of communicating to personnel in the field or directly to members of our contractor network throughout the US. Our duty officers will receive any emergency call and they are responsible for initiating the activation of NRC or ICN personnel and equipment. In the first hours of a spill event, the IOC will maintain constant communication with VIWAPA's Incident

Management Team until NRC supervisory personnel can arrive on scene at the facility or spill location. This organizational structure and pool of available resources allows NRC to mount a massive response, as necessary, through the cascading of personnel and equipment to the site of the incident.

The following is a general guide of NRC'S organization and procedures necessary to respond to emergencies related to an oil spill resulting from our client's operations.

This plan is meant to complement our client's Facility Response Plan and ERAP plans.

Framework

National Response Corporation (NRC) is identified as an Oil Spill Removal Organization in our Client members' Oil Spill Response Plans and can provide equipment and personnel capable of responding to a discharge or a threat of a discharge of oil resulting from our client's operations.

NRC has established a robust team of qualified, experienced and trained offshore and nearshore personnel available to respond to oil spills within the shortest response time from NRC's bases in St. Croix, St. Thomas, Puerto Rico, or the U.S. mainland.

In order to deliver the highest response standards to our customers, NRC's response team is staffed with a leading international NRC Operations Manager located Puerto Rico and St. Croix and supported by a highly experienced local response team conformed by a Base Manager, Response Supervisors, and base responders. In addition to this, the local team shall be backed and supported by the wider NRC and Independent Contractor Network (ICN) structure. This is in line with all of NRC's global operations and is structured to provide proven leadership and the required technical expertise.

The Call Out team, a cohort of NRC trained partner personnel, will be made available in numbers dictated by the scale of the incident to support both offshore and shoreline/port response teams.

Procedures

- NRC may be contacted to initiate oil spill response actions for any size discharge or threat of such discharge.
- Upon discovery of a discharge, the responsible party through the designated Qualified Individual (QI) should notify NRC International Operations Center (IOC) in Great River, NY. Preferred means for initial notification is by voice telephone with written confirmation made by email or facsimile.
- For international notifications, the +1 631 224-9141, Ext 0 telephone number is dedicated to Spill Reports Only. Within the U.S., calls can be made to the +1 (800) 899-4672.
- NRC IOC Duty Officer will communicate the emergency to NRC Caribbean Operations Manager and NRC Base Manager in St. Croix, who will activate NRC response staff, followed by the equipment mobilization procedures.

- If needed, the event is communicated to our subcontractors or other independent groups who oversees the activation and mobilization of NRC's contracted personnel and resources.
- NRC Oil Spill Response Vessel or Barges may be activated from St. Croix, or, if need we will active additional response vessels through our Marine Resource Network and request the number of vessels required.
- Based on the activation from the initial call, response resources will be activated based on general activation of 2 hours after the activation request.
- Transit time of the Oil Spill Response Vessel (OSRV) will depend on the location of the spill incident, weather, and sea conditions at the time.

REPORT SPILLS TO
NRC INTERNATIONAL OPERATIONS CENTER (IOC)
24 HOUR EMERGENCIES
US Calls: (800) 899-4672
International Calls: +1 631 224-9141 – Ext. 0
E-Mail: iocdo@nrcc.com

1.8 Spill Incident Reporting and Performance Review:

As an OSRO service provide to VIWAPA, NRC will work closely with VIWAPA's environmental team to ensure that all spill event reporting is timely and accurate. This will include the following areas of reporting:

- Emergency Response Reports:
 - Expense Reports
 - Sub-Contractor Spend
 - Other reports required by VIWAPA
- Hot Wash and Lessons Learned Reports – NRC will work closely with VIWAPA's HSE team to provide accurate and timely Lessons Learned reports after any relevant VIWAPA incident or training events, including After Action Reports (AAR).
- Incident Reports – Any incident or accident occurring on site during a VIWAPA event will be immediately reported to VIWAPA chain of command and both an assessment and Incident Report will be provided to VIWAPA.
- Health and Safety – NRC adhere to all VIWAPA contractor Health and Safety policies and guidance and provide timely and accurate reports related to HSE. USE and NRC take a "Checking and Corrective Action" action approach to all HSE related areas. That is, we are continuously monitoring and evaluating HSE controls, and take corrective actions whenever needed.

More specifically, NRC will work closely with VIWAPA's HSE team to provide timely reporting of response activities. Once a Hot Wash has been completed for a spill incident and VIWAPA has concluded response activities, NRC will provide an After-Action Report (AAR) after every oil spill event within five (5) business days in coordination with VIWAPA's HSE team. The AAR report will include details such as:

- Spill location
- Spilled material
- Estimated quantity of spilled material – if known or quantified by VIWAPA
- Time and date of spill and remedial actions
- Remedial actions taken
- Follow-up remedial actions
- Transport and disposal manifests
- Photographs (including aerials if available and requested)

Performance Review

NRC looks forward to a strengthening our partnership with VIWAPA and can participate in annual reviews with VIWAPA for the purpose of reviewing and strengthening response process and procedures as they relate to:

- Health and Safety
- Environmental Management
- Lessons Learned Meeting and Programs
- Spill Response Activities
- Key Performance Indicators focused on Safety, Operations, Delivery of Services, and Cost accountability

D. Experience

Response Personnel

With over 28 years of emergency response and time critical removal service experience, USE/NRC has the trained personnel and equipment fleet to provide its clients with full-service coverage 24 hours a day, seven days a week. Qualified and experienced in providing emergency response services to its clients, USE/NRC utilizes a diverse, well trained, and exceptionally experienced staff of professionals and skilled labor to effectively manage and perform small and large emergency response projects. NRC's professionals have experience with federal, state, and local regulations concerning emergency response services and waste disposal.

NRC professionals maintain a variety of professional licenses, certifications, and other registrations relevant to their disciplines and the type of work they perform. These include certified industrial hygienists, hazardous material managers, trainers, UST supervisors, soil matrix supervisors, Assessors, and professional engineers. These professionals not only manage NRC projects but assist NRC field personnel in the successful completion of their emergency response and time critical projects. Despite the high-risk jobs that NRC performs on a near daily basis, NRC's safety

record is commendable and has a Health and Safety (CIH) Manager available to respond on site or on the phone to any emergency if the response warrants those qualifications.

NRC staff members are cross-trained and experienced in serving in multiple roles for various types of hazardous materials projects. On an as-needed basis, personnel serve in additional roles subordinate to their routine position and also serve as alternates to primary personnel they report to.

Currently US Ecology/NRC has approximately 4,000 full time employees. Additionally, an army of on-call ICN and stand-by personnel are available for deployment, as-needed.

As a national OSRO, US Ecology/NRC has office locations in USVI, Puerto Rico and throughout the West, Gulf, and East Coasts and numerous additional resource staging locations throughout our national areas of operations. When needed, immediate response support can also be provided to VIWAPA from one of US Ecology and NRC's many strategically located resource centers. In addition, NRC has teamed with experienced hazardous materials response subcontractors throughout the US.

Recent Emergency Response Events

The following are examples of some of the more significant spill responses from the more than 1,000 responses that NRC has responded to since its inception in 1992. On average, NRC responds to more than 50 spills per year throughout all of our operating areas.

NRC has responded to over a thousand land and marine emergency response events under virtually every possible type of hazardous material release circumstance. NRC has successfully and aggressively managed the comprehensive and effective cleanup of hydrocarbon spills and hazardous materials incidents over large, populated, valuable, and complex geographic areas with its responsive and reliable team of personnel committed to performance.

NRC is capable of handling release events on any scale as well as managing multiple events simultaneously. This capability has been demonstrated in a wide range of events over the years, including the highly publicized Deepwater Horizon event in 2010, where NRC was one of two primary contracted OSROs to respond to the disaster. In addition to deploying our Gulf of Mexico assets, including 6 NRC offshore response vessels and 2 NRC oil spill barges, NRC deployed 400 third party-chartered vessels for skimming and recovery operations. Over the course of the response, over 100 NRC personnel were deployed and were either integrated into ICS positions in the various Unified Command posts or acted as field operation supervisors to more than 1,800 Independent Contractor Network (ICN) personnel. NRC played a large role in the aerial dispersant operations as well as the supervision of 48 decontamination sites throughout the affected area.

NRC has a long history of contracting and working with municipalities and government agencies including but not limited to the USCG, US EPA, BSEE, Bureau of Land Management, and Washington Department of Ecology (WADOE), DPNR, and most state environmental agencies. We understand the complexities of working under multiple stakeholders and regulatory agencies at both the Federal and State levels.

The following examples of emergency response projects describe the events, and the steps NRC took to contain, stop, mitigate and remediate the environmental impact.

- **Capsized RoRo Cargo Ship, St. Simon's Sound, Georgia 2019 – 2020** - 320,000 gallons oil spilled - NRC was the primary OSRO managing response event. This has been a long-protracted event due to fatalities, loss of cargo, and the complexity of the ship grounding. NRC is still on site for this recovery operation.
- **Pipeline release in North Dakota, 2019**
 - NRC provided response services in a remote location in North Dakota for Client. Over 40,000 man-hours were worked with no recordable incidents for health or safety. NRC assisted in coordinating deployment of remote housing and catering services saving time and money for Client in not having to mobilize personnel to deliver meals to sight.
- **Plant fire in Houston, TX 2019**
 - NRC worked for the client in decontaminating equipment and personnel in the "Hot Zone" for this response associated with a large fire. NRC had High-Haz trained personnel on sight for recommendations to the command staff.
- **Pipeline release in Missouri, 2019**
 - NRC worked closely with Client to work in a small space to minimize the impact to the surrounding land. In addition, NRC was able to assist Client in sourcing a large number of traction matts for this project. Upon completion of the event, we worked with Client to pre-identify traction matts and suppliers for any future needs.
- **Fuel Oil Release in New York Harbour, Staten Island, 2019**
- **Crude release impacting lake in Abilene, TX 2018**
- **HFO Release from Cargo Ship into MS River, New Orleans, 2018**
- **ULSD Release in Port Reading NJ, 2018**
- **Large Jet Fuel Release at Miami Int'l Airport, 2018**
- **Pipeline release in South Dakota, 2017**
 - NRC worked with our client to ensure a timely response in a cold weather environment. This event took place during Thanksgiving, and through our contracted vendor, NRC was able to work at the direction of the client to provide a Thanksgiving meal to their response personnel that were deployed away from their families. The client thought this was important to show their team the value they place on the moral of the responders and we were very pleased to be able to assist in providing that service.
- **Barge release in Corpus Christi, TX in 2017**
- **Refugio pipeline rupture, Santa Barbara, CA 2015**
- **Houston Ship Channel, Galveston, TX, 2014.** Ship collision and release of 4,000 bbls of bunker fuel
- **Pipeline rupture and spill in Wellington, OH in January 2012**
 - An underground pipeline rupture caused 120,000 gallons of gasoline to release into a nearby creek. The released caused the evacuation of some town residents. Winter operations included cold weather response dealing with cold temperatures, ice and snow. NRC was the primary OSRO and project managed the event.

- **Uncontrolled offshore subsurface release – GoM 2010** was the largest response in US history to date. NRC was one of two primary OSRO for this Spill of National Significance event
- **Oil Refinery Explosion & Oil Spill - Puerto Rico, 2009**
- **Oil Bulk Storage Facility – Puerto Rico, 2007**

E. Safety

NRC is committed to ensuring the health and safety of our employees in the performance of assigned work, giving full regard to evolving industry practices and regulatory requirements. NRC continuously strives to achieve excellence in health and safety performance and to be recognized as a leader in accident prevention. All employees have the responsibility and accountability for safety performance through active involvement in safety initiatives. Employees are encouraged to raise safety issues and are empowered to make changes.

NRC takes a proactive approach to Health and Safety that reduces Near Misses, first aid injuries, recordable and time loss injuries by tracking and evaluating the variables related to these incidents and formulating new controls to limit them. This is being accomplished by getting **back to safety basics** and empowering our labor force to take ownership in our unified safety program. We are continuing to develop a proactive safety culture to recognize, evaluate and control hazards and/or at-risk behaviors prior to the onset of injuries or incidents. This continues to be accomplished through the following:

- **Provide regular communication to all employees throughout USE /NRC Domestic** in the form of newsletters, safety alerts and monthly All Hands Meetings. Frequent communication will ensure employees are updated on Safety Management System (SMS) procedure changes/additions, safety stand downs, lessons learned and best practices.
- **Emphasize Key Performance Indicators for each Branch/Office.** Monthly summaries will be reviewed by General Managers and executive staff and will be utilized for annual performance criteria. KPIs have been in effect since May 1, 2015. The KPI's are designed to focus on leading or proactive indicators.
- **Conduct Supervisor/Management training** to capture both regulatory requirements as well as injury prevention procedures, including hazard recognition/prevention, daily safety plans and job safety analysis development. All new management staff and employee receive this training as part of their New Employee Orientation process.
- **New Employee Orientation.** From day one, all NRC employees receive a detailed and comprehensive new employee orientation covering all aspects of HR, HSEQ and Production policies and programs.
- **Ensure all employees have timely access to current SMS safety procedures, SOPs, JHAs and alerts.**
Procedures are distributed and discussed in All Hands Meetings and stored on a company accessible share drive to ensure access.
 - **Behavioral Based Safety (PAWS).** The NRC BBS PAWS program has been a viable part of the proactive safety culture throughout NRC Domestic since 2015 and it

will be rolled out to all SWS employees by the end of 2018. Components of the PAWS program consist of the following:

- Training (conducting observations, coaching, feedback, corrective actions).
- Safety observations with subsequent trend analysis.
- Safety suggestions / Near Miss reports.
- Identification and timely follow-up on Corrective Actions identified in audits, incidents, suggestions.
- Reinforcement of employee ownership for safety including **Stop Work Authority (SWA)**.
- Trend analysis, to assist with focused safety training or alerts.
- **Reinforce the NRC Safety recognition program in all Branches/Offices to enhance those employees who go above and beyond the everyday call of duty.** NRC initiated a company-wide program of safety recognition (Go for the Gold) to encourage the submittal of quality safety suggestions from employees. These employees will be recognized for identifying and/or correcting safety hazards, submitting safety suggestions, utilizing SWA or demonstrating an active role in our PAWS program.
- **Company-Wide Implementation of 3rd Party Corrective Action Tracking.** NRC utilizes 3rd party data base to document, assign responsibility and track Corrective Actions that originate from audits, suggestions, root cause analysis and BBS Observations. This tracking system ensures timely completion of potentially unsafe conditions.
- **Consolidate and create a Central Job Hazard Analysis data base available to all Project Managers** to ensure hazards are identified and preventive actions spelled out.
- **The frequency and quality of site safety audits will increase throughout all regions of USE/NRC Domestic.** These audits will be conducted by both NRC HSEQ personnel, as well as NRC Operations/Project Managers, using a standardized format which identifies and tracks corrective actions. By sharing this information across the company, at risk behaviors and all hazards will be more easily identified and then communicated to all employees to mitigate the immediate risks at the functional site. The audit findings and corrective actions are evaluated by the Director of HSEQ and the HSEQ team.

This effort to create a shared governance of safety will be promoted by open and frequent communication between the HSEQ department and its NRC stakeholders. This exchange will help to ensure all stakeholder requirements are met and energies refocused to meet the dynamic needs of NRC personnel.

F. Training, Drills and Exercise Support

NRC offers a variety of emergency response, health and safety, operations, and environmental training programs. Our trainers are highly experienced trainers, who are also very familiar with emergency response events. Our goal is to deliver training courses or to facilitate tabletop exercises that prepare our clients for real emergencies. Our training and exercise programs focus on response management, compliance, command and control, and functional needs. Our expert trainers will provide a training curriculum that emphasizes incident response, recovery, and regulatory compliance. Programs have included small tabletop drills to full scale government led exercises.

For Hazwoper training, NRC offers a fully certified OSHA courses, providing certification for 40 hours, 24, hours (if requested), and 8-hour refresher training. Our Incident Command System (ICS) training adheres to the USCG's Preparedness for Response Exercise Program (PREP) as well as the Department of Homeland Security Homeland Security Exercise and Evaluation Program (HSEEP) guidelines for Oil Pollution Act (OPA90) exercise development. The principal objectives of our programs are as follows:

- Validate and test our client's contingency operations and response plans.
- Provide guidance to our clients that will assist them in building and strengthening relationships and partnerships with stakeholders in the event of an emergency response.
- Refining contingency plans with an emphasis on identifying response resources and response capabilities.
- Provide adequate training and familiarization for exercise participants in their roles and responsibilities for conducting contingency operations.
- Familiarizing players with National Incident Management System/Incident Command System (NIMS/ICS) terminology and processes.

Some of the training programs that NRC can provide to VIWAPA:

- HAZWOPER - 29 CFR 1910.120 – 40 and 8-hour (24 Hour upon request)
- PREP program drills and exercises
 - Tabletop Exercises (TTX)
 - Full Scale SMT TTX Exercises
 - QI notification exercises
 - Equipment deployment exercises
 - Area exercises
- Qualified Individual (QI)
- NIMS based Incident Command System (ICS) - (100 - 400 and Section Specific)

Pricing for Hazwoper exercises is presented in Section 2, Proposed Pricing.

G. Waste Transportation and Disposal

In addition to OSRO services, NRC can assist VIWAPA with its waste management and disposal services. Since the initiation of OPA 90, NRC has been assisting its clients in the decontamination, transport, and disposal of waste as a result of oil spill or natural disaster events. Our focus is on safety, protecting the environment, and ensuring reliable, responsive, and cost-effective solutions to meet your specific waste needs.

Depending on the type of hazardous or non-hazardous waste, NRC or its parent company US Ecology, can assist with the transport and disposal of waste streams. While it is anticipated that VIWAPA will maintain direct ownership of the waste material, NRC can assist with providing certified drums, boxes, or containers for disposal. Some waste materials can be disposed of at

the Bovoni Landfill in St. Thomas; however, non-hazardous, and hazardous waste streams are usually shipped to the U.S. mainland for disposal or recycling. Some smaller quantities of contact water can be recycled in Puerto Rico. For all other disposal work, NRC will use fully licensed and permitted subcontractors that can arrange transport of waste streams from USVI to the US mainland.

Further, our parent company, US Ecology owns and operate five RCRA-permitted hazardous waste disposal facilities located across North America. US Ecology's secure landfills accept several hundred waste codes, feature multilayer disposal design with extensive monitoring systems, and are co-located with state-of-the art waste treatment operations. Their disposal facilities are served by an extensive transportation network featuring ship, barge, truck, and high-volume throughput rail capacities.

US Ecology currently received waste streams from another facility operator in St. Croix. Current available shipping routes include transportation through Puerto Rico. To comply with USDA soil import requirements for shipments containing impacted soil, regulated under APHIS (Animal and Plant Health Inspection Service), waste containers/shipments will require inspection inspected by USDA in Puerto Rico prior to transport to the Port of Houston, TX and then shipped to our US Ecology Texas Robstown landfill in most cases. Depending on the content of APHIS soil, our Robstown facility will be the likely disposal facility for waste streams originating in the USVI. For soils exceeding acceptance criteria at our US Ecology Texas landfill, US Ecology will use one of its subcontractor facilities, such as Clean Harbors in Deer Park, TX or Veolia in Port Arthur, TX to ensure compliance with both EPA and USDA regulations. All US Ecology subcontractors are fully licensed and permitted to accept contaminated or APHIS determined waste.

If needed, US Ecology can assist with special packaging requirements. Our US Ecology teams can provide advice regarding all protocols for APHIS and shipment protocols. All US Ecology disposal facilities, or their subcontractor disposal facilities, are fully licensed and authorized to receive RCRA hazardous waste. US Ecology can manage the receipt of hazardous and non-hazardous waste streams from VIWAP facilities once received from certified third-party transport shippers. US Ecology will provide written authorization for each type of regulated waste stream slated for off-site disposal, treatment, storage, or recycling prior to removal from VIWAPA facilities.

For your reference, we provide in the attached supporting documentation copies of US Ecology Texas Audit Handbook for its Robstown, TX disposal facility along with our USDA Hazardous Waste Permit. Due to the large number of permit documents, all of US Ecology's hazardous waste permits can be downloaded from our company's web page at <http://www.usecology.com>. We have also included our subcontractor, Clean Harbor's Facility Audit Handbook, which includes its operating licenses and permits for your review. Upon request, we can provide copies of permits and certifications from other subcontractors.

Section 2

A. Pricing Proposal

NRC is pleased to present the following lump sum retainer pricing proposal in consideration of a new five-year contract with VIWAPA. Our proposed pricing a full partnership for environmental compliance to VIWAPA operations in the USVI.

For your consideration, we propose the following annual retainer fee for our services:

Five Year Contract Term:

\$8,500 / per annum

Please note that multi-year agreements are subject to Consumer Price Index (CPI) annual adjustments.

NRC will provide VIWAPA with the following contracted OSRO emergency response services:

1. NRC will provide VIWAPA full OPA90 OSRO services including Maximum Most Probable Discharge (MMPD) through Worst Case Discharge (WCD) Tiers 1, 2, and 3 to meet your US regulatory planning requirements. We maintain the nationwide USCG OSRO classification in accordance with USCG OSRO guidelines so you simply site NRC in your FRP plans as your OSRO without the need to list multiple providers for plan approval.
2. 24 Hour / 365 Day Emergency Response Capability:
NRC will provide VIWAPA with a “One Call” response activation system through our International Operations Center (IOC) manned twenty-four hours per day, seven days a week and capable of communicating to personnel in the field or directly to members of our contractor network throughout the US. Our duty officers will receive any emergency call and in turn initiate the activation of NRC or ICN personnel and equipment. In the first hours of a spill or response, the IOC will maintain constant communication with your Incident Management Team or designated representative.
3. NRC will provide experienced personnel necessary to manage an oil spill or natural disaster emergency, provide supervisory management of the response or hazardous release, manage all response activities and maintain OSRO support staffing to sustain a response and for any protracted period with the necessary support personnel.
4. NRC can augment VIWAPA’s Incident Management Team if requested. We will provide your IMT support personnel to assist VIWAPA in the emergency management of oil or hazardous substance spills, or another significant incident. NRC can provide additional trained professionals to support your Incident Management Team in the areas of planning, operations, logistics and finance. In addition, we will mobilize, upon request, a manager to work with your IMT team until a forward command is established and command is handed off.

5. As part of our comprehensive OSRO services, NRC will provide the following:
 - MMPD through WCD Tier 3 response capability for VIWAPA meeting USCG and EPA regulatory requirements. NRC will work with VIWAPA to identify any gap areas where response resources may not be geographically located. If needed, we can assist with the identification of equipment and or contractors needed to provide additional resources in those areas.
 - Mobilization and daily tracking/reporting of response personnel and equipment.
 - Preliminary assessment of any spill response event.
 - Development of a Health and Safety Plan;
 - Protection and countermeasures to protect environmentally sensitive areas;
 - Containment;
 - Recovery;
 - Disposal and waste plan if appropriate and requested;
 - Removal of spilled product from impacted areas;
 - Decontamination of personnel and equipment;
 - Cleanup
 - Demobilization;
 - Daily documentation and cost accounting;
 - Activity or after-action reports as requested.
6. NRC will provide VIWAPA with accurate and daily cost estimates during a response for both NRC and ICN Time and Material costs.
7. NRC can assist VIWAPA with its Incident Management Team Tabletop (IMTT) drills, boom deployment exercises, and PREP requirements, and we would be pleased to work closely with your management team in supporting such programs.
8. NRC will provide VIWAPA with an Annual Preparedness for Response Exercise Program (PREP) Equipment Deployment Summary Report. This report documents OSRO equipment deployment exercise information in compliance with the PREP guidelines for reportable and evaluated on-water equipment deployments during exercises, training, and actual spill responses. This information is necessary for OSRO equipment deployment credit in accordance with the PREP program.
9. NRC can provide logistical support to VIWAPA during emergency and non-emergency responses. NRC's Logistics Department is well known for its expertise in identifying, procuring, and tracking resources during spills or natural disasters.

B. Training Costs:

Per the request of VIWAPA PR-11-21, NRC can provide both refresher and 40 hour Hazwoper training. In general, there are various training levels within HAZWOPER. Training levels should reflect the type of work and the potential hazard involved in the work. For personnel that could be involved in clean up of an oil spill, the industry and OSHA (29 CFR 1910.20) generally suggest personnel have 40 hour, 24 hour, and 8 hour annual refresher training.

- 24-hour HAZWOPER Training: Appropriate training for those who are less directly involved with uncontrolled hazardous waste sites (such as, but not limited to, ground water monitoring, land surveying, or geophysical surveying).
- 40-hour HAZWOPER Training: Those individuals directly involved in the cleaning up of hazardous materials, its storage, or its transportation should take the 40-hour HAZWOPER course. The 40-hour course is required for the safety of workers at uncontrolled hazardous waste sites.
- 8 hours HAZWOPER Training: Managers are required to attain the same level of training (either the 40-hour or 24-hour training) as those they supervise, and an additional 8 hours.

For the purposes of this proposal, NRC provides the following cost estimates based on the task of providing either on site 8-Hour Hazwoper Refresher or 40-Hour Hazwoper training. We have also provided costs for Virtual or remote training should the Pandemic continue to prohibit travel to VIWAPA facilities. Further, NRC will be pleased to provide additional cost estimates for 24-hour training if requested. Based on the following tasks, we provide the following cost estimates for Hazwoper training:

Task	Hrs	Cost per hour	Total	Comment / Assumptions
Task 1 - Conduct On-Site 8 Hour Hazwoper Refresher				
One day of Hazwoper Training; 1 instructor				
Travel Time	2	1500	\$3,000	
Deliver Hazwoper 8-Hour Refresher	1	1500	\$1,500	
Planning Meetings (remote)	2	950	\$1,900	
Per Diem Expenses (3 days)				
Hotel	3	\$250	\$750	
Meals	3	\$150	\$450	
Rental Car	3	\$100	\$300	
Air Fare	1	\$850	\$850	
Misc			\$200	
Training Materials		\$500	\$500	
Sub-total			\$9,450	
Number of trainers	1			
Total 8 Hour			\$9,450	
Task 2 - 40 Hour On-site Hazwoper Training				
Travel Time	2	1500	\$3,000	
Deliver Hazwoper 40-Hour Refresher	5	1500	\$7,500	
Planning Meetings (remote)	2	950	\$1,900	
Per Diem Expenses (3 days)				
Hotel	7	\$250	\$1,750	
Meals	7	\$150	\$1,050	
Rental Car	7	\$100	\$700	
Air Fare	1	\$850	\$850	
Misc			\$200	
Training Materials		\$500	\$500	
Sub-total			\$17,450	
Number of trainers*	2			*40 Hour is based on two trainers.
Total for 40 Hour			\$34,900	
Total Estimated On-Site Costs:			\$44,350	

Task 3 - Conduct Virtual 8 Hour Hazwoper Refresher (Remote Training)				
One day of Hazwoper Training; 1 instructor				
Travel Time	0	1500	\$0	
Deliver Hazwoper 8-Hour Refresher	1	950	\$950	
Planning Meetings (remote)	2	950	\$1,900	
Per Diem Expenses (3 days)				
Misc			\$0	
Training Materials		\$500	\$500	
Sub-total			\$3,350	
Number of trainers	1			
Total 8 Hour			\$3,350	
Task 4 - Conduct Virtual 40 Hour Hazwoper Refresher (Remote Training)				
One day of Hazwoper Training; 1 instructor				
Travel Time	0	950	\$0	
Deliver Hazwoper 40-Hour Refresher	5	950	\$4,750	
Planning Meetings (remote)	2	950	\$1,900	
Misc			\$0	
Training Materials		\$500	\$500	
Sub-total			\$7,150	
Number of trainers	2			
Total 40 Hour			\$7,150	
Total Virtual Hazwoper Training (Remote):				
			\$10,500	
Note: Per Diem costs are estimated costs. Per Diems will be billed at actual Cost + 20%				

Conclusion

We believe the response resources and approach presented in this proposal provides VIWAPA with a complement of response equipment that will meet its USCG, EPA, DPNR and OPA90 regulatory compliance requirements and look forward discussing ways to meet your future response needs.

Throughout the years, NRC has demonstrated its ability to work closely with VIWAPA and to provide the highest quality service and experience to VIWAPA operations. We are fully aware of the strong commitment that VIWAPA has made to Health and Safety, Quality Assurance, and to Cost-effective

operations. We are confident that our partnership with VIWAPA will continue to expand and accelerate both of our companies' emergency response preparedness programs.

Thank you for this opportunity to provide VIWAPA with our emergency response services proposal. We look forward to expanding our cooperation with VIWAPA and to working with your compliance team in cultivating the highest quality response preparedness program in support of VIWAPA operations. We are confident that we can work together to define an outstanding program that will provide VIWAPA with the highest level of oil spill response capability and training and believe we can be of value in assisting you with your planning and response needs.

Please let us know if you have any questions and we look forward to discussing our proposal with you.

Thank you for your interest in NRC.

Deborah Wick
Director of Client Services