

Provide safe work plan to:

- inspect ocean containers, trailer and totes
- inventory all containers and contents
- secure proper storage of all non chemical items
- ensure proper containerization and classification of chemicals
- clean up and containerize any spill residue
- arrange for proper disposition of chemicals

General Operational Procedures

- 1 ensure safe work area and properly equipped personnel (PPE etc). Provide decon area for personnel and equipment
- 2 ensure handling equipment in proper and safe working order
- 3 review and prepare for emergency contingencies (weather, release, injury, etc)
- 4 review of existing Abrachem inventory sheets and any MSDS
- 5 conduct daily prework meeting to review safety, emergency response and operations
- 6 ocean containers (OC) will be secured and moved to ground level
- 7 trailers will be located so as to ensure easy access and egress
- 8 OC, trailers will be marked for identification purposes and given initial inspection. Priority status assigned to each OC/trailer. Highest priority given to OC / trailer situation which presents highest hazardous situation. Each OC/trailer will be addressed per priority list.
- 9 Any chemicals stored within general equipment OC/trailers will be removed and placed with other chemicals
- 10 Trailers containing general equipment, tires etc will placed in one general area and address as secondary priority.

### Chemical Procedures.

Log will be developed to record condition of drums, contents, etc (see attached)  
Work sites TBD by field personnel. Each work site will be properly secured and contained as necessary.

- Chemical containers from each OC / trailer will be removed and inspected against possible inventory, markings, etc.
- Clearly identified material in proper containers will be placed in area 1.
- Containers of "unlabeled" material in proper containers will be placed in area 2
- Containers in poor conditions will address immediately. Procedures will be followed to ensure safe transfer/ overpack into proper containers. Contents to be field tested if necessary. Procedure will take place inside OC/trailers or in area 3. New containers will be secured and labeled per log.
- Any spill residue will be addressed as needed to ensure workplace safety, etc  
Residue will be placed in containers and inventoried.

#### Area 1 -- identified material

Final inventory will be developed.

#### Area 2 -- testing required

Field tests will be conducted to determine basic hazards. Where necessary composite samples will be collected for further analysis

#### Area 3 - work area

Material will be properly containerized and field tested (where necessary)  
Containers will be transferred to either area 1 or 2 as appropriate.

### Disposition of Material

Upon classification / identification of material every effort will be made to identify material per initial Abrachem inventory and tracked back to original project and / or "customer".

Proper DOT and EPA regulations will be followed regarding disposition of material.

Identified "customer " material.

Discussions will be held with original "customer" regarding disposition of material.

Possible logistics include – return to customer as product or disposition as waste.

Material to be removed in timely manner.

Unknown / untrackable material

Final decision / classification of material will be responsibility of Abrachem.

Material will be removed in timely manner.



