U.S. Department of Homeland Security

United States Coast Guard

Commanding Officer
U.S. Coast Guard
National Strike Force
Coordination Center

1461 North Road Street
Elizabeth City, NC 27909
Phone: 252-331-4400

16465

JAN 0 8 2021

NRC/US Ecology
Attn: Ryan McCoy
3500 Sunrise Highway
Suite 200, Building 200
Great River, NY 11739

Dear Mr. McCoy:

This letter is to notify you that your Oil Spill Removal Organization's (OSRO) updated plan application for dispersant classification has been reviewed and evaluated utilizing the Dispersant Mission Planner 2 (DMP2) Calculator, and facility and vessel response plan requirements set forth in 33 CFR 154 and 155, respectively. Based on the data contained within your application, your company has successfully met the criteria for dispersant classification in the Captain of the Port Zones listed in enclosure (1).

You are responsible for informing this office and your clients of any changes to your status. The Response Resource Inventory (RRI) database is currently being modified to capture dispersant data. Once these modifications have been completed, you will receive access notification accompanied by instructions for managing your dispersant data within the RRI.

If you have any questions or would like more information regarding your classifications, please contact my staff using the contact information found in enclosure (2).

Thank you for your participation in the OSRO Classification program.

Sincerely,

T. B. Hutley
Captain, U. S. Coast Guard

Enclosures: (1) NRC Dispersant Classifications
(2) NSFCC Contact List

Copy: COMDT (CG-MER, CG-FAC)
LANT Area
PAC Area
CGD One (dr)
CGD Five (dr)
CGD Seven (dr)
CGD Eight (dr)
CGD Nine (dr)
CGD Eleven (dr)
CGD Thirteen (dr)

CGD Fourteen (dr)
SECTOR Boston
SECTOR Charleston
SECTOR Columbia River
SECTOR Corpus Christi
SECTOR Delaware Bay
SECTOR Honolulu
SECTOR Houston/Galveston
SECTOR Jacksonville
SECTOR Key West
SECTOR Long Island Sound
SECTOR LA/LB
SECTOR Maryland-NCR
SECTOR Miami
SECTOR Mobile
MSU Morgan City
SECTOR New Orleans
SECTOR New York
SECTOR North Carolina
SECTOR Northern New England
MSU Port Arthur
SECTOR Puget Sound
SECTOR San Diego
SECTOR San Francisco
SECTOR San Juan
MSU Savannah
SECTOR Southeastern New England
SECTOR St. Petersburg
SECTOR Virginia
EPA Region 1, 2, 3, 4, 6, 9, 10
BSEE
PHMSA

NRC DISPERSANT CLASSIFICATIONS

COTP ZONE	WCD1	WCD2	WCD3
Boston	X	X	X
Charleston	X	X	X
Columbia River (Portland, OR)	X	X	X
Corpus Christi	X	X	X
Delaware Bay	X	X	X
Honolulu	X	X	X
Houston/Galveston	X	X	X
Jacksonville	X	X	X
Key West	X	X	X
Long Island Sound	X	X	X
LA/LB	X	X	X
Miami	X	X	X
Mobile	X	X	X
Morgan City	X	X	X
New Orleans	X	X	X
New York	X	X	X
North Carolina	X	X	X
Northern New England	X	X	X
Port Arthur	X	X	X
Puget Sound (Seattle, WA)	X	X	X
San Diego	X	X	X
San Francisco	X	X	X
San Juan	X	X	X
Savannah	X	X	X
Southeastern New England	X	X	X
St Petersburg	X	X	X
Virginia	X	X	X

NATIONAL STRIKE FORCE COORDINATION CENTER (NSFCC)

Marine Environmental Response Preparedness Department
(MERPD) Contact List

Phone: (252) 331-4400

Name	Extension	Email
MST1 Aidan Waterbury	X4380	Aidan.J.Waterbury@uscg.mil
Mr. Thomas Boyles	X4360	Thomas.L.Boyles2@uscg.mil
MST2 Robert Thomas	X4381	Robert.T.Thomas@uscg.mil
MK2 Bryan Jones	X4382	Bryan.M.Jones@uscg.mil

ENCLOSURE (2)

AYUNTAMIENTO CONSTITUCIONAL
DEL MUNICIPIO DE PARAÍSO, TABASCO
2018 - 2021

DEPENDENCIA:

DIRECCIÓN *PROTECCIÓN AMBIENTAL Y DESARROLLO SUSTENTABLE*

OFICIO No.: DPAYDS/034/2020.

ASUNTO: ANUENCIA AMBIENTAL

PARAÍSO, TABASCO A 06 DE MARZO DEL 2020.

NATIONAL RESPONSE CORPORATION NRS S. DE R.L. DE C.V.
PRESENTE

EN REFERENCIA A LA SOLICITUD RECIBIDA EL DIA **20 DE FEBRERO DEL 2020** EN LA DIRECCIÓN DE PROTECCIÓN AMBIENTAL Y DESARROLLO SUSTENTABLE DEL AYUNTAMIENTO DE PARAÍSO, TABASCO, CON ASUNTO PARA OBTENER LA ANUENCIA AMBIENTAL, DEL ESTABLECIMIENTO CON RAZÓN SOCIAL: **NATIONAL RESPONSE CORPORATION NRS S.DE R.L. DE C.V.** R.F.C. **JIGE830601Q21.** CON GIRO: **SERVICIOS DE MEDIO AMBIENTE** CON DOMICILIO **CARRETERA VECINAL PARAISO-COMALCALCO S/N, RANCHERIA MOCTEZUMA 1RA SECCIÓN, PARAISO ,TABASCO C.P.86606;** LA CUAL PRESENTÓ EN TIEMPO Y FORMA LA DOCUMENTACIÓN REQUERIDA SOMETIDA A EVALUACIÓN Y RESOLUCIÓN ASI COMO EL PAGO DE DERECHOS CORRESPONDIENTE PARA ESTE FIN Y PARA EFECTOS DE LA PRESENTE, LA DIRECCIÓN DE PROTECCIÓN AMBIENTAL Y DESARROLLO SUSTENTABLE:

OTORGA

ANUENCIA AMBIENTAL

CONSTANCIA DE CUMPLIMIENTO AMBIENTAL

VIGENCIA

06 MARZO DEL 2020 AL 06 MARZO DEL 2021

DE CONFORMIDAD CON EL ARTÍCULO 8 FRACCIÓN III, Y ARTÍCULO 12, FRACCIONES I, II, III, IV, V, VI, VII, X, XI, XIII, XXI, XXII, XXIII, XXIV, XXV, Y CON FUNDAMENTO EN EL CAPÍTULO 12, ARTÍCULO 113, DE LA LEY DE PROTECCIÓN AMBIENTAL DEL ESTADO DE TABASCO Y CAPÍTULO V, ARTÍCULO 31, DEL REGLAMENTO DE PROTECCIÓN AMBIENTAL DEL MUNICIPIO DE PARAÍSO, TABASCO, EN EL QUE INDICA QUE "LAS OBRAS Y ESTABLECIMIENTOS

C.C.P. Archivo

Calle: Ignacio Comonfort Esq. Melchor Ocampo N°100 C.P 86600
Tel. (933) 3330025. Paraíso, Tabasco.

AYUNTAMIENTO CONSTITUCIONAL
DEL MUNICIPIO DE PARAISO, TABASCO
2018-2021
COORDINACION DE PROTECCION CIVIL

NO. DE OFICIO: UMPC/0340/2020

EXPEDIENTE: UMPC/01

FECHA: Paraíso Tab. A 06 de marzo 2020

ASUNTO: CONSTANCIA DE ANUENCIA

NATIONAL RESPONSE CORPORATION MEXICO NRC, S. DE R.L. DE C.V.
P R E S E N T E:

Informo que, siguiendo los alineamientos que marca la ley de protección civil del Estado de Tabasco y su reglamento en sus artículos **4, fracc. I. II, III, IV y Art.6 fracc. I, II, III, IV Y V** y después de haber realizado una visita de inspección a su empresa con giro de **"SERVICIO DE MEDIO AMBIENTE",** Ubicado en la **Carretera Estatal Paraíso – Comalcalco s/n, Moctezuma 1ra. Secc.** del municipio de Paraíso Tabasco, me permito comunicarle que de acuerdo al fundamento jurídico de la ley antes citada, se determina que dicho inmueble cumple con las medidas Preventivas de Seguridad y Protección Civil necesarias por lo que al no existir algún inconveniente o impedimento en esta materia se extiende la presente.

CONSTANCIA DE ANUENCIA

(VIGENTE DEL 12 DE FEBRERO DEL 2020 AL 12 DE FEBRERO DEL 2021)

Exhortándolo para que esta empresa a la cual representa, cumpla con los lineamientos que en materia de Protección Civil esta unidad Municipal emita, con la finalidad de que el personal bajo su cargo, proveedores y sus clientes tengan una cultura de autoprotección y auto cuidado, se extiende la presente para los fines legales que al interesado convenga.

ATENTAMENTE

H. AYUNTAMIENTO CONSTITUCIONAL PARAISO, TABASCO
COORDINACIÓN MUNICIPAL DE PROTECCIÓN CIVIL 2018-2021

TEC. FREDDY MADRIGAL SANCHEZ
COORDINADOR DE UMPC

C.C.P C. ANTONIO ALEJANDRO ALMEIDA. - PRESIDENTE MUNICIPAL. PARA SU SUPERIOR CONOCIMIENTO
LIC. JORGE MIER Y TERAN SUAREZ. - COORDINADOR GENERAL DEL INSTITUTO DE PROTECCIÓN CIVIL
ARCHIVO

QUALITY ASSURANCE PLAN

As a company standard, each office provides an exceptional level of performance, customer service, safety and regulatory compliance. Our customers recognize this commitment and work closely with our technical staff to develop customized solutions for their ongoing waste management needs. This collaboration establishes a mutual understanding of priorities and objectives with respect to costs savings, regulatory compliance, and long-term liability.

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 across the globe. We tailor our services to meet specific client requirements while delivering a recognized and proven standard of excellence. As a globally recognized Oil Spill Removal Organization (OSRO), NRC is committed to providing the highest quality service across a full spectrum of response services, including supervisory personnel, labor, equipment, and materials to mitigate any emergency or multiple emergencies at our clients' 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.

NRC has been rated by the United States Coast Guard (USCG) with the highest possible classifications (MMPD, WCD1, WCD2 and WCD3) for meeting federal oil spill response requirements in the Inland, Rivers/Canals and Ocean environments. NRC also offers approved AMPD services to meet both state and federal requirements for initial response requirements during transfer operations.

PROGRAM / PROJECT MANAGEMENT & QUALITY CONTROL

The Program Manager is the primary point of contact for communications between NRC and the client, and will review and approve paperwork prepared under the contract prior to their submittal. NRC will draft all required manifests and shipping documentation and provide to the client for review. After an approved profile, reviewed manifest and other documents are received, NRC will mobilize to the site, package and label the waste if required and load it on permitted placarded trucks for transportation to the disposal facility.

NRC uses a job number system for the assignment and tracking of project costs. A unique job number is assigned to each project which will be used when recording any costs of a project including labor, equipment, materials, and subcontractors on the Daily Project Report (DPR). These DPRs are reviewed and approved each week by the Project and Branch Managers to assure accuracy. After review by the branch level managers, a macro level review is performed by the Program/Project Manager.

QUALITY CONTROL PROGRAM

NRC has written quality assurance procedures in place. They are not collated as a single sweeping document, but instead are developed and implemented at the department head level of our organization. The purpose of NRC's Quality Control Program (QCP) is to provide a "roadmap" for achieving operational excellence. The QCP is a series of interrelated processes that focus on establishing and achieving the HSEQ Policy and objectives of NRC. The QCP recognizes several important management principles adopted by top management as a framework for guiding the organization towards improved performance:

Customer Focus: Recognition that NRC depends on its customers and it is therefore imperative for current and future requirements to be understood.

Environmental Aspects and Safety Hazards: Environmental and safety impact is taken into consideration when setting objectives for processes and products.

Management Commitment: Not only an initial declaration of commitment but a full understanding of the system.

Employee Involvement: Ensuring that the corporate environment encourages staff to become fully involved in achieving organizational objectives and individual abilities are utilized and nurtured for the company's benefit.

Process Approach: Defining activities necessary to achieve objectives and ensuring that activities are managed as a process including control of outsourced processes.

Continual Improvement: Focuses on enhancing the QCP to achieve improvements in the overall

performance of the business consistent with the HSEQ Policy Statement.

Documented IMS: This identifies the basic methodology by which NRC operates. By evaluating compliance, the company can identify areas that need improvement. NRC routinely develops and implements Quality Assurance Plans (QAPs) as part of both our emergency and planned projects. The overall objective of our QAPs are to establish a framework for regularly confirming that the project's objectives are met. The implementation of the QAP is the responsibility of the entire project execution team, but will be led by the Program Manager.

Field Operations: Project managers are responsible for the execution of work performed by NRC field service teams and technical staff. Specific company requirements and protocols are laid out in Project Managers Manual and in in-house company procedures established for health and safety, equipment/material dispatch, waste management and accounting. Completed projects are reviewed by direct supervisors, typically department heads or branch managers, who follow a Project Checklist to confirm that protocols are being followed and if not, issue a notice of deficiency for open items to be completed before closing out the job.

Health & Safety: NRC shares our client's requirements for quality programs at all levels of our operations. Safety procedures are written by personnel with academic expertise and operational experience. The procedures are translated into Site Specific Safety Plans and Job Hazard Analysis incorporating each client's specific requirements. To ensure these procedures are followed and the client needs are met, NRC has an operational Safety Q.A. program consisting of regular site audits conducted Safety and Project Managers. This audit program is documented on checklists to ensure consistent approaches that are not personality dependent. Results of all the audits are submitted to NRC Safety Director and compiled on a central data base for use in updating safety procedures to address hazard trends.

Risk Management: NRC's Supervisors are responsible for the logistics of scheduling resources for projects. PMs are supported by the Program Manager from an operational and administrative standpoint. When a project requires extraordinary resources to support the remedial objections, the Program Manager works with the PM to ensure deployment of the best available resources. Operations meetings are conducted daily and are focused on short term logistical needs.

Project Managers are responsible for receiving and responding to emergency and non-emergency call-out requests, mobilizing people and equipment, and responding to the incident site. Once assigned to a project, the Project Manager will be the single point of contact and fully dedicated to that response action for the duration of the work.

NRC Response Supervisors proposed for this contract have years of experience in responding to marine and land hazardous materials incidents, including on-water and land based spills, highway spills, railcar incidents, as well as hazardous and non-hazardous waste management. In addition, Response Supervisors prepare hazardous waste shipping papers, labels, LDRs, profiling and packaging, supervising crews for confined space entry projects, and demolition/cleaning projects involving hazardous chemicals.

On-Going Project Management Meetings: NRC's Account/Program Manager will coordinate with the Client Project Coordinator and other Client personnel regularly to follow-up and confirm that the Client's needs are being met. He will schedule follow-up meetings/calls with the Client to update progress on the program and facility events.

Key Performance Indicators (KPIs): Several reporting mechanisms are utilized by NRC to track and maintain the quality of our services. As part of our Key Performance Indicators (KPI), NRC tracks our success in responding to emergencies within two hours. We provide KPI tracking to several private sector clients and utilize internal weekly and monthly project reporting to produce required documentation.

Fleet Maintenance & Warehousing: This particular end of our business is responsible for the procurement, permitting, licensing and upkeep of vehicles, vessels, equipment tools and supplies. Many assurance and control protocols have been created and implemented to assure quality of operation. Most recognizable measures being performed as SOPs are as follows:

- Weekly cross check of completed maintenance assignments by a third-party appraiser (Lead Mechanic). Vehicles are pulled in and inspected to confirm work was completed per specifications. Report card is generated each week and reviewed with inspected mechanics. If deficiencies noted a corrective action plan is implemented to remedy situation.

- Daily startup of equipment and tools being requested by field operations in the morning prior to load out and subsequent tagging as “Checked out/Satisfactory” or pulled from service. Afternoon walk-through of yard to take consumable supply inventory and note any shortages of supply. Actions serve to assure tools and equipment are functioning before deployment to job site and the warehouse is stocked with PPE, absorbents, drums, cleaning supplies, etc.

Additionally, NRC is subject to Bi-Annual Terminal inspection to hold transportation licenses. Inspection covers maintenance records, Drivers Logs, Vehicle Inspection Reports, Drug & Alcohol testing amongst other records or actions required by Department of Transportation. We have received satisfactory rating (best score) at all service center locations.

Diesel Tracking and Reporting: All NRC vehicles are equipped with “Fleetmatics” GPS tracking systems, enabling real time tracking and detailed reporting for each vehicle.

Call-Out Tracking: Following receipt of a Call-Out and review of the Contractor Authorization Form, NRC’s Project Manager will complete a Project Start Form (PSF) which authorizes investments in personnel and resources for the response. The PSF includes specific information regarding the response including but not limited to authorization numbers, address, description of project, approved Call-Out value, identification of which contract or rate the project will be billed, required invoice backup, and NRC’s assigned Project Manager. Once complete, this form is sent to the corporate office with a copy of the Authorization Form. Upon receipt and approval, a unique job number is assigned to the response and utilized to track all aspects of the project including hours worked and resources deployed.

Resource usage on response projects is tracked via NRC’s *Daily Project Reports (DPR*). DPRs are completed prior to the end of each day or shift and accurately detail the hours worked by all employees, equipment type and hours utilized, and material quantities used during that day or shift. The DPR’s include contract billing codes to facilitate billing National Grid upon completion of the work and have been used by NRC on other response projects.

Call-Outs are tracked by NRC Project Managers by phone or meeting with the site Foreman or Supervisor at the end of the day. All DPR’s are approved by NRC’s Project Manager and Branch Manager prior to their submittal to NRC’s billing department to ensure accuracy and consistency with the contract. NRC’s hourly workers are paid based on actual hours worked. Hourly employees are paid time and one-half their normal rate for work performed in excess of forty (40) hours in a work week.

Accounting: The accounting group follows a three-stage process for assuring customer invoices are accurately produced. The first step entails receipt of the project file from the project manager and confirmation that a copy of the contract and a billing directive is contained therein. The billing department prepares the invoice and returns to project manager for review. The project manager confirms the proper template has been used and looks for cell, math or missing data errors in the invoice that may exist as well as confirms copies of all third-party invoices and other pertinent documents are in the file and returns to billing department for revisions or finalization. Billing department adjusts and submits to direct supervisor of the project manager for second review of the invoice package. This procedure has been in place for several years although not yet finalized in a written protocol.

Employee Selection: As a federal contractor, NRC adheres to OFCCP regulations to be an Affirmative Action / Equal Opportunity Employer. All open positions, at a minimum, are posted on state job boards, veteran career sites and diversity jobs boards. All applicants are screened equally to meet the minimum qualifications of the position. Selected candidates are presented to the Hiring Manager for consideration. After reviewing the candidates’ resumes and interviewing those determined to be the most qualified, the Hiring Manager will make the selection and disposition the others for tracking of statistical data.

Business Development: The business development group is comprised of professional sales, marketing, estimating and contracts personnel. Several quality control measures have been put forth in writing to assure business activities are followed in accordance with company standards. Included in this submittal are examples of the proposal/estimate review protocol and the contract file checklist form used to confirm newly executed contract file are 100% complete.