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.