



May
1998

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**Statement
of
Qualifications**

Code 3, Inc.
A Boots and Coots / IWC Company
24 Hour Emergency Response
(800) 421-4911



9761

TABLE OF CONTENTS

1.0 – LOCATION DIRECTORY	5
24 HOUR EMERGENCY RESPONSE.....	5
LOCATION MAP	6
RESPONSE MILEAGE AND ESTIMATED TRAVEL TIME TO MAJOR DESTINATIONS.....	7
2.0 – INTRODUCTION	9
3.0 – COMPANY HISTORY	11
4.0 – SCOPE OF SERVICES.....	12
EMERGENCY RESPONSE SERVICES.....	12
<i>Emergency Response to Transportation Incidents</i>	12
<i>Emergency Response to Facility Incidents</i>	14
<i>Emergency Response to Oil Spills</i>	15
CHEMNET®	15
<i>Emergency Response to Mexico</i>	16
REMEDIATION AND FIELD SERVICES.....	16
<i>Remediation</i>	16
<i>Hazardous Waste Management, Investigation & Remediation</i>	17
<i>Petroleum Storage Tanks (PST)</i>	17
<i>Leaking Petroleum Tank Management (LPST)</i>	17
<i>Monitoring</i>	17
<i>Other Field Services</i>	17
TRAINING SERVICES	20
<i>Incident Command Training (8 Hour) 29 CFR 1910.120 Section q 6 (v)</i>	21
<i>HAZWOPER Technician (40 Hour) 29 CFR 1910.120 Section q</i>	21
<i>HAZWOPER Refresher (8 Hours) 29 CFR 1910.120 Sections e, p, and q</i>	21
<i>Confined Space Entry and Rescue Training (16 Hours) 29 CFR 1910.146</i>	21
ENVIRONMENTAL & OCCUPATIONAL SAFETY AND HEALTH SERVICES	22
<i>Air Monitoring / Industrial Hygiene</i>	22
<i>Safety / Plant Services</i>	23
5.0 – CERTIFICATES AND REGISTRATIONS.....	24
6.0 – SENIOR MANAGEMENT	25
LEE THOMPSON, CSP, CES (PRESIDENT / CEO)	25
TIM O'BRIEN (VICE PRESIDENT OF OPERATIONS)	25
RICK ROARK (VICE PRESIDENT OF SALES AND MARKETING)	26
7.0 – KEY MANAGEMENT / PERSONNEL	27
VINCE S. ABRIGO (RESPONSE COORDINATOR/INSTRUCTOR/FIRE FIGHTER)	27
ESTEBAN (STEVE) ALVARADO (HOUSTON DISTRICT MANAGER)	27
KELLA "PANAMA" BAKER III (FORT WORTH DISTRICT MANAGER)	28
AMADO CANO, JR. (FIREFIGHTER/FORMAN)	28
RITNEY CHAMPOND (SAFETY OFFICER/PROJECT MANAGER, SAN ANTONIO)	28
BRIAN COLE (DISPOSAL MANAGER).....	29
CHESTER CULLEY, CEP, CHMM (GENERAL MANAGER – DENVER)	29
CURTIS DOMINICAK, CEM (PROJECT MANAGER).....	29
BOB GALVAN (LAREDO OPERATIONS MANAGER)	29
JOSE GARCIA (FIREFIGHTER/SUPERVISOR)	29
MARK HENDERSON (HEALTH AND SAFETY SPECIALIST)	30
DON HOLDING (SAN ANTONIO DISTRICT MANAGER).....	30
RICHARD HYDE, CHMM (PROJECT MANAGER).....	30

GARY JOHNSON (PROJECT MANAGER)	31
ERIC KELLY (EL PASO DISTRICT MANAGER).....	31
JOHN LONGEST, CHMM (DENVER DISTRICT MANAGER)	31
JOSE L. MARTINEZ (FOREMAN)	31
PETE MARTINEZ (HEALTH AND SAFETY SPECIALIST)	31
JT PONDER (PROJECT MANAGER)	32
CLAY REID (HARLINGEN DISTRICT MANAGER).....	32
TREY SHAFFER (MANAGER INFORMATION SYSTEMS)	32
ALISA SHELTON (TECHNICAL SERVICES CONSULTANT).....	33
DAVID SOWELL (TECHNICAL SERVICES CONSULTANT).....	33
BUDDY SPRETZ (TECHNICAL SERVICES CONSULTANT)	33
GUALBERTO TORRES (FIREFIGHTER/SUPERVISOR/INSTRUCTOR).....	33
GARY WINN (EMERGENCY RESPONSE MANAGER – HOUSTON).....	33
8.0 – ASSOCIATES	35
MARIBEL BERMUDEZ (ASSOCIATE ENVIRONMENTAL SCIENTIST)	35
JAIME FLORES (ASSOCIATE GEOLOGIST)	35
J. ROBIN GELSTON (SENIOR SCIENTIST/PROJECT MANAGER).....	35
DAVID A. HANAWA, M.S. (CONSULTANT / ENGINEER).....	36
MARC HAWS, P.G., REM, CEA (SENIOR GEOLOGIST/PROJECT MANAGER).....	36
JOHN HINOJOSA (SENIOR SCIENTIST).....	37
HECTOR J. LOPEZ, P.E. (SENIOR ENGINEER)	37
CARLOS M. MARIN, PH.D., P.E. (CONSULTANT / ENGINEER)	37
GLENN C. MILLNER, PH.D. (TOXICOLOGIST)	38
KIM MORGAN (PLANNING SPECIALIST)	38
ALAN C. NYE, PH.D. (TOXICOLOGIST).....	38
JAMES E. RUMBO, P.E. (PROJECT MANAGER).....	39
AUBURN J. STEWARD (INFORMATION SYSTEMS / RESEARCH).....	39
JOSEPH A. TAMAYO, P.E. (SENIOR ENGINEER)	39
MONA A. TARKINGTON (INDUSTRIAL HYGIENIST).....	40
9.0 – INSURANCE COVERAGE / BONDING.....	41
10.0 – PARTIAL LIST OF MAJOR CLIENTS.....	42
TRANSPORTATION / FREIGHT.....	42
SCHOOLS / UNIVERSITIES	43
GOVERNMENT.....	43
UTILITY	43
OIL AND GAS	43
PETROCHEMICAL / INDUSTRIAL	43
MARINE	44
MANUFACTURING.....	44
INSURANCE.....	44
LEGAL.....	44
11.0 – EQUIPMENT AND MATERIALS	45
VEHICLES	45
RESPONSE TRAILERS / VANS	45
SUPERVISOR RESPONSE VEHICLE INVENTORY	45
RESPONSE TRAILER INVENTORY.....	46
TRANSFER EQUIPMENT	46
<i>Pumps / Compressors</i>	46
<i>Hose</i>	46
PATCH TOOLS AND EQUIPMENT.....	46
OIL SPILL EQUIPMENT	46

HEAVY EQUIPMENT 47
SAMPLING EQUIPMENT 47
MISCELLANEOUS EQUIPMENT..... 47
MATERIALS..... 47
12.0 – SPILL MANAGEMENT..... 49
INTRODUCTION AND STATEMENT OF COMMAND CONCEPTS..... 49
ORGANIZATIONAL DEVELOPMENT..... 49
COMMUNICATIONS STANDARD OPERATING PROCEDURES..... 52
GENERAL INCIDENT PROCEDURES AND SITE SAFETY 55
ROLES AND RESPONSIBILITIES OF CODE 3, INC. RESPONDERS..... 59
MAJOR INCIDENT MANAGEMENT SYSTEM..... 60
COMMAND STAFF 61
SAFE WORK PRACTICES..... 66
INCIDENT TERMINATION PROCEDURES 71
POST INCIDENT PROCEDURES 71

1.0 – LOCATION DIRECTORY

24 Hour Emergency Response

(800) 421-4911

Harlingen District

4201 S. Expressway 77/83
Harlingen, TX 78550

Latitude 26 25' / Longitude 97 75'
(956) 421-4911
(956) 421- 3593 FAX

Laredo District

14414 Maquilla Loop
Laredo, TX 78401

Latitude 27 50' / Longitude 99 50'
(956) 729-1911
(956) 729-1277 FAX

San Antonio District

118 E. Turbo Drive
San Antonio, TX 78216

Latitude 29 50' / Longitude 98 50'
(210) 342-0911
(210) 342-3460 FAX

Houston District

509 N. 8th Street
La Porte, TX 77571

Latitude 29 75' / Longitude 95 00'
(281) 470-0444
(281) 470-0534 FAX

Fort Worth District

7719 Sand Street
Fort Worth, TX 76118

Latitude 32 75' / Longitude 98 75'
(817) 595-5714
(817) 595-7646 FAX

El Paso District

6596 Montana Avenue, Suite H
El Paso, TX 79925

Latitude 31 75' / Longitude 107 50'
(915) 781-1100
(915) 781-1199 FAX

Denver District

512 Violet Street
Golden, Colorado 80401

Latitude 39 75' / Longitude 105 00'
(303) 271-9112
(303) 271-9102 FAX

Location Map



Note: Code 3 will open an office in Garland, Texas on April 1, 1998.

Response Mileage and Estimated Travel Time to Major Destinations

Code 3, Inc. Response Location	Destination City	State	Mileage	Estimated Vehicular Travel Time
El Paso District	Tucson	AZ	315	4 Hours 55 Minutes
Denver District	Colorado Springs	CO	89	1 Hour 27 Minutes
Denver District	Denver	CO	14	19 Minutes
Denver District	Grand Junction	CO	226	3 Hours 35 Minutes
Denver District	Pueblo	CO	133	2 Hours 11 Minutes
Dallas District	Shreveport	LA	195	3 Hours 7 Minutes
Denver District	North Platte	NE	272	4 Hours 18 Minutes
El Paso District	Albuquerque	NM	269	4 Hours 18 Minutes
El Paso District	Roswell	NM	216	4 Hours 18 Minutes
Fort Worth District	Lawton	OK	179	3 Hours 20 Minutes
Fort Worth District	Oklahoma City	OK	203	3 Hours 15 Minutes
Fort Worth District	Abilene	TX	151	2 Hours 23 Minutes
El Paso District	Amarillo	TX	458	8 Hours 24 Minutes
San Antonio District	Austin	TX	80	1 Hour 25 Minutes
Houston District	Beaumont	TX	72	1 Hour 10 Minutes
Harlingen District	Brownsville	TX	27	31 Minutes
Fort Worth District	Brownwood	TX	156	2 Hours 41 Minutes
Houston District	Bryan	TX	145	2 Hours 41 Minutes
Harlingen District	Corpus Christi	TX	142	2 Hours 53 Minutes
Dallas District	Dallas	TX	14	21 Minutes
El Paso District	El Paso	TX	5	7 Minutes
Fort Worth District	Fort Worth	TX	15	22 Minutes
Harlingen District	Harlingen	TX	5	7 Minutes
Houston District	Houston	TX	29	39 Minutes
Laredo District	Laredo	TX	5	7 Minutes
Houston District	Lufkin	TX	148	2 Hours 43 Minutes
Harlingen District	McAllen	TX	37	35 Minutes
El Paso District	Midland	TX	306	4 Hours 49 Minutes
Dallas, District	Paris	TX	105	1 Hour 57 Minutes
Houston District	Port Arthur	TX	80	1 Hour 25 Minutes
San Antonio District	San Angelo	TX	214	3 Hours 50 Minutes
San Antonio District	San Antonio	TX	15	22 Minutes
Dallas, District	Sherman	TX	70	1 Hour 41 Minutes
Dallas District	Texarcana	TX	181	2 Hours 37 Minutes
Dallas District	Tyler	TX	103	1 Hour 45 Minutes
Fort Worth District	Waco	TX	88	1 Hour 25 Minutes
Fort Worth District	Wichita Falls	TX	122	2 Hours 26 Minutes
Denver District	Cheyenne	WY	110	1 Hour 48 Minutes

Code 3, Inc.

All estimated travel times are based on travel at 65 miles per hour on interstates and freeways and 50 miles per hour on divided highways and U.S. or state highways. Additionally, actual travel times may vary depending on actual traffic and weather conditions at the time of travel.

Code 3, Inc. maintains contracts with subcontractors throughout the United States. When vehicular response time from a Code 3 response office is extensive, Code 3 may subcontract with the nearest qualified contractor while Code 3 personnel are enroute to the incident.

2.0 – INTRODUCTION

Code 3, Inc. is a full service environmental firm that offers both public and private sector clients effective solutions to challenging environmental problems. Specifically, Code 3 provides its clients with safe, timely and cost-effective hazardous materials and oil spill emergency response, site remediation, remedial design, environmental consulting and engineering. Code 3 also offers tank cleaning, asbestos consulting and abatement, waste management activities, facility contingency planning, occupational safety and health training and consulting, risk and vulnerability analysis, and direct push probe and hollow stem auger drilling services.

Code 3's staff includes experienced civil, environmental and safety engineers, chemists, geologists, hydrogeologists, environmental scientists, emergency planners, industrial hygienists and law enforcement and fire suppression professionals.

Code 3 Strike Teams are vastly diversified with unique environmental and educational qualifications integrated with extensive training and coupled with Code 3's numerous emergency response units equipped with state-of-the-art environmental emergency response equipment and instrumentation. We are strategically located in El Paso, Garland, Fort Worth, Harlingen, Houston, Laredo, San Antonio, Texas and Denver, Colorado to provide 24-hour emergency response services along the United States / Mexico Border from Brownsville to El Paso and throughout Texas, Oklahoma, Louisiana, New Mexico, Arizona and Colorado.

Code 3 has established solid professional relationships with the following organizations:

- Texas Natural Resource Conservation Commission
- Texas General Land Office
- Texas Department of Public Safety
- Texas Department of Transportation
- Texas Railroad Commission
- U.S. Coast Guard
- U.S. Environmental Protection Agency
- U.S. Department of Transportation
- U.S. Customs Service
- U.S. Drug Enforcement Agency
- U.S. General Services Agency
- U.S. Federal Emergency Management Agency
- Local Emergency Response Agency Personnel

Each of these organizations knows our reputation is one that has been earned through handling environmental situations in a cost effective and creative manner within regulatory guidelines. Code 3 has been actively involved in the leadership of Local Emergency Planning Committees (LEPC) throughout the Southwest. Code 3 has also been actively involved with special training for the EPA, the TNRCC and US Customs service in a wide variety of hazardous materials management programs.

Code 3 has been recognized as the leader in the industry when performing Hazardous Material Commodity Flow Studies, Risk and Vulnerability Analysis for communities, and for our professional knowledge of key issues concerning international transportation. Our personnel have made presentations throughout the United States on international transportation issues

relating to the Texas/Mexico Border, including recognition in TIME Magazine (December 11, 1995) for Code 3's expertise and experience in transportation issues along the Texas/Mexico Border. Additionally, Code 3 personnel have been requested to conduct hazardous material training sessions at international hazardous material conferences by the EPA, after being recognized for excellence in the field of training.

Code 3 is the sole source contractor for the Texas Natural Resource Conservation Commission for emergency response services. This contract with the agency was awarded to Code 3 on the merits of the company's capabilities to respond to virtually any chemical emergency within the borders of the State of Texas.

Code 3 combines the best engineering practices and the most practical field experience coupled with the latest technologies available today for investigation, remediation, restoration and management of hazardous material problems, sites and facilities.

3.0 – COMPANY HISTORY

In 1993, Code 3 established its first office in Harlingen, Texas to provide chemical spill emergency response services to the Rio Grande Valley. On September 1, 1993, a week before the founding partners planned to go into business, a leaking tanker of chloromethane spurred the newly organized team into action. Within a short period of time, Code 3's business grew and the company expanded its offices to provide services in Laredo, Texas.

In 1997, after establishing a solid reputation as the premier emergency response company in South Texas, Code 3 embarked on an aggressive expansion plan and opened offices in San Antonio and Houston, Texas. Continued growth and expansion allowed Code 3 to open subsequent offices in Fort Worth and El Paso, Texas as well as Denver, Colorado.

In December of 1997, Code 3's owners signed a letter of intent to sell the company to Boots & Coots / IWC, one of the three principal oil well fire fighting companies in the world. The acquisition was finalized on February 20, 1998 and both Lee Thompson and Tim O'Brien, two of the original owners of Code 3, were retained to provide continued direction and leadership to the company.

In 1997, IWC acquired Boots and Coots and created Boots & Coots / IWC. Personnel from Boots & Coots / IWC are fire fighters who learned the trade with the legendary Red Adair Company. Both Asger "Boots" Hansen and Edward "Coots" continue to serve as consultants to the company. One of the most notable accomplishments of Boots & Coots and IWC was their combined response to hundreds of the more than 500 burning oil well fires left in the wake of the 1991 Gulf War in Kuwait.

In addition to Code 3, Inc., Boots & Coots / IWC has also acquired ITS Environmental Services / ABASCO, a designer and manufacturer of a comprehensive line of rapid response oil/chemical spill containment and reclamation equipment and products. These products include skimmers, containment boom and boom reels, dispersant sprayers, dispersal agents, absorbents, response vessels, industrial products, spill response packages and waste oil recovery and remediation services. Boots & Coots / IWC purchased the logistics and supply division of International Tool and Supply Company, Inc. which has offices in Venezuela, Peru, UAE and the United Kingdom.

4.0 – SCOPE OF SERVICES

Emergency Response Services

Code 3's emergency response division was founded on three basic principals: first, to handle spills safely; second, handle them within the regulatory guidelines and mandates; and third, restore the site or facility to normal operations as soon as possible. When a spill occurs, Code 3 can deliver the equipment and personnel resources to handle any incident. Strike Team members have more than 600 years of cumulative emergency response experience and have responded to over 12,000 hazardous materials incidents across the United States and Mexico. The strike team has earned the admiration and respect of the clients it serves by providing cost-effective solutions to their emergency situations.

Code 3's strike teams are extensively trained and fully equipped to respond to all levels and types of responses rapidly and efficiently. The company is capable of responding to transportation incidents, chemical spills and industrial fires and explosions. In addition, Code 3 can provide hazardous material escort services. Strike team members are on call 24 hours a day, every day of the year and can mobilize and respond in minutes to an incident. Code 3's Strike Team has a strong background in environmental and occupational safety and health response regulations, environmental engineering, chemistry, hazardous material / oil spill emergency response methodologies, remedial technologies, industrial fire suppression, hazardous material and waste management, law enforcement, investigation, rescue, and paramedic operations. Specific emergency response services include:

- Hazardous Material Spill Response and Cleanup
- Inland and Marine Oil Spill Response and Cleanup
- Hazardous Material Transport/Export
- Transfer of High and Low Pressure Liquids
- Industrial Fire Fighting
- Reactive Explosive Disposal and Stabilization
- Confined Space Entry Supervision and Rescue

Code 3 is competent to handle emergency response to all discharges of hazardous materials listed in the hazardous material table and the appendix to the hazardous materials table found in the US Department of Transportation's Hazardous Materials Regulations (49 CFR 172.101).

Emergency Response to Transportation Incidents

Chemical Transfer; Major Railroad Company; March 1997: Code 3 responded to a leaking railcar of a highly flammable solvent. The car, which had been overloaded, was in transit when the product expanded forcing a product release through the safety relief valve. The Strike Team mobilized its chemical transfer equipment and transferred approximately 2,000 gallons of the product into a tank truck. The team also remediated the impacted soils.

Contamination Neutralization; Transportation Company; October 1996: Code 3 provided emergency response, regulatory support and site remediation for a 4,000 gallon release of sulfuric acid into a pond. After accumulating the appropriate product information and analytical data, Code 3 neutralized the acid utilizing proprietary technology and received authority from the Brownsville Public Utility Board, after performing analysis of the impacted water, to discharge

the neutralized material to the sanitary system. This resulted in important disposal savings to the client.

Compressed Gas Transfer; Railroad Company; January 1996: A client contracted Code 3 and requested emergency response and compressed gas transfer services. The Strike Team responded with a transfer pump and stainless steel braided hoses to perform this delicate operation of transferring compressed gas from one railcar to another.

Hydrofluoric Acid Response; Transporter; March 1996: Code 3 mobilized emergency response services in response to leaking containers of hydrofluoric (HF) acid in the back of a van trailer. Strike Team members donned Level A protective gear and entered the trailer. Sixteen drums of hydrofluoric acid were leaking and a HF cloud was present. The hot zone was immediately reevaluated and an appropriate evacuation area was established while team members removed and overpacked the leaking containers. The trailer and contaminated areas were neutralized.

LPG Response/Transfer; Transportation Company; February 1997: A municipal fire department contacted Code 3's emergency response division to respond to an overturned LPG tanker. Code 3's Strike Team responded to a busy highway intersection where the accident had occurred and immediately performed a damage assessment of the tanker. The tank truck suffered only minor damages. Code 3, in conjunction with the transporter, then determined that transferring the product out of the damaged container prior to uprighting was necessary to protect the integrity of the container. Code 3 identified the location of an empty LPG tanker and subcontracted the tanker for use during the transfer of the product. After a successful transfer of over half of the product, Code 3 utilized a twenty-ton crane to upright the tanker. The remainder of the site was cleaned up and the Texas Department of Transportation reopened the highway intersection.

Leaking Drums; Major Railroad Company; March 1997: Code 3 was contracted by the client to perform emergency response and remediation services in response to several leaking drums of Hapatane in a van trailer. The trailer contained 80 drums of the material and nineteen were leaking after rubbing against several nails in the floor of the trailer. Strike Team members patched and overpacked the leaking drums. After abating the emergency, the team began decontamination activities on the inside of the trailer and excavated contaminated soil areas.

Radioactive Materials Response; Major Railroad Company; September 1996: Code 3 was retained to perform radiological monitoring of an area that had been potentially impacted as the result of a train derailment. Strike Team and Industrial Hygiene personnel utilized Geiger counters to identify any release of radioactive material. All monitoring demonstrated that there had been no release of any radioactive materials and Code 3 technicians secured the load for shipment to a permitted facility for repackaging.

Reactive and Explosives Response; Transportation Company; February 1997: Code 3 was called to provide emergency response, remediation and waste disposal services in response to four leaking drums of Nitrocellulose. The containers had rubbed against a sharp object in the wall of the van trailer causing small punctures in each of the drums. Facilitating OSHA required protocols to approach and manage reactive/explosive materials, the team carefully assessed the materials and their containers. Blast protective PPE and portable shields were utilized to position Code 3's remote opening device. The team then patched and overpacked the leaking containers. Code 3 then decontaminated the inside of the trailer and excavated a small area of contaminated soil. Code 3's waste management division ensured proper waste disposal was completed on behalf of the client.

Emergency Response to Facility Incidents

Facility Response; Transportation Company; March 1997: Code 3 was mobilized to provide emergency services in response to a tank trailer leaking Hydrochloric Acid at a major manufacturing facility in Austin, Texas. Upon arrival the Code 3 Strike Team donned Level "A" PPE to make an initial assessment of the size and location of the leak. Once in the hot zone, the entry team located a hole in the steel container approximately 1½" in diameter. A successful second entry was made to place a "Vettor" tank bandage around the container. A second acid tanker was staged on-site for transfer operations. Code 3 personnel set up a double diaphragm pump and chemical resistant hoses while waiting for the tanker for transfer. The team successfully completed the transfer of over 2,000 gallons of product upon arrival of the transfer vessel. The team then began decontamination services of the spill area as well as the parts of the facility that were impacted by the acid gas that was produced during the release.

Class A/B Poison Response; Custom Broker; September 1996: The client contacted Code 3 in response to a punctured drum containing a poisonous liquid in their facility. The Strike Team responded and provided air monitoring as well as overpacking services. The facility was ventilated, decontaminated and the waste generated by the spill was disposed of by Code 3.

Fire Suppression/Response; Major Manufacturing Company; March 1997: Code 3 was contracted by a client to perform emergency actions and remediation services to a fire involving more than two thousand drums of magnesium dross. The drums had been stored outside in the elements for over three years and, when the area received heavy rains, the drums began to react causing a massive chemical fire. The Code 3 Strike Team mobilized with twelve of its industrial firefighters and fire suppression equipment. The fire was brought under control within twenty-four hours utilizing containment and segregation methods and sand to suffocate the fire. Immediately after controlling the fire, the Strike Team brought in over two thousand steel eighty-five gallon overpack drums to repackage the material. The Team worked around the clock to repackage the material and prevent any further reaction of the material. Code 3's waste disposal team also began arrangements to recycle the material at a facility in California. Code 3 is currently performing scheduled remediation services related to this event.

Pesticide Response; Freight Forwarder; November 1996: Code 3 was activated in response to two leaking drums of malathion. Employees of the facility had begun unloading the trailer when a forklift punctured the drums. The facility employees attempted to control the spill without the proper personal protection, grossly contaminating the employees. Strike Team members immediately established a decontamination area to decontaminate the employees and simultaneously entered the facility to mitigate and overpack the drums. The facility and trailer were also decontaminated.

Fire. Suppression/Containment; Major Manufacturing Company; February 1998: Initial activities focused on the immediate containment of firewater runoff from the plant. An earthen dam was constructed at the down stream flow of the runoff stream to prevent continuing flow into a nearby creek. Shortly thereafter, in order to prevent additional runoff, a trench was constructed that encircled the entire facility. Vacuum trucks were mobilized to remove liquids and two 20,000-gallon frac tanks were staged on site to contain the runoff water. Approximately five hours after receiving a contract to initiate work, two toxicologists and one certified industrial hygienist were mobilized to the site to begin air monitoring and site safety work. Additionally,

wipe samples were collected from nearby structures that were potentially impacted by the smoke from the burning facility.

Code 3 personnel continued to work around the clock assisting fire department personnel and National Foam Cushion management with ongoing containment and emergency response activities. Throughout the weekend, Code 3 personnel worked to remove foam residue and foreign material from the creek that had been impacted during the initial fire suppression activities. Additionally, Code 3 personnel excavated approximately 60 cubic yards of contaminated soil from the yards of private residences located on the north side of the plant.

Code 3 personnel conducted a methodical dismantling of the burned structure in order to secure any hazardous chemicals that were present in the rubble. During all site work, Code 3 performed continuous air monitoring. After the facility has been disassembled and the structural members staged, Code 3 will pressure-wash the slab and contain the rinse water. After the slab was washed, it was sampled to ensure that no chemical residue remains. The trench that encircled the facility was sampled and any contaminated areas of the trench and surrounding soil were excavated, staged and sampled for transportation and disposal at an approved facility.

Emergency Response to Oil Spills

Oil Spill Response in Tidal Affected Waters; Texas General Land Office; August 1996: A ship owner contacted Code 3 requesting remediation services. The call was placed in response to 26 miles of oil contaminated shoreline. Code 3 mobilized more than 70 hazardous material technicians, boats, 4x4 trucks, containment boom, oil spill snare, ATV's, roll-off boxes, and heavy equipment during this five day operation. Subsequently, the GLO contracted Code 3 to perform waste disposal activities for over 50 tons of tar balls cleaned up during the operation.

CHEMNET®

In February 1998: Code 3 was awarded a contract with CHEMNET® to serve as an emergency response contractor for approximately two hundred major chemical companies that are associated with the Chemical Manufacturers Association. Code 3 is among a select group of 24 emergency response contractors chosen to fulfill this role throughout the United States.

When 15 sulfuric acid manufacturers concerned about the safe transportation of their product banded together in May 1872, they formed an association that is known today as the Chemical Manufacturers Association (CMA). One hundred and twenty-five years later, CMA's 193 member companies make up the nation's leading export industry, employing 1.015 million people at approximately 12,050 plant sites.

In 1997, CHEMTREC® (the parent organization of CHEMNET®) received a record number of emergency and non-emergency calls which was 13 percent higher than in 1996. The number of calls has been steadily increasing at a rate of about 10% per year. This will become increasingly important to Code 3, Inc. as our customers look for ways to improve the quality of the response contractors they choose. Today, companies utilizing the services of the CHEMNET® response network include Solvay, Exxon Chemical, Rhone Poulenc, Albemarl, BASF, PPG, Eastman Chemical Company, Fina Oil and Chemical, FMC, Georgia Gulf and Phillips Petroleum Company.

CHEMNET[®] is activated when a CHEMNET[®] member company is notified by the CHEMTREC[®] center that a chemical distribution incident involving one of its products has occurred and that expert assistance may be needed at the scene. If the affected company is unable to respond to the scene in a timely manner because of distance or other circumstances, the CHEMTREC[®] emergency center links the shipper with the response team closest to the scene that is able to provide assistance. Code 3's locations in Fort Worth, El Paso, Denver, San Antonio, Laredo, Harlingen and Houston have placed our company in a key position to play a critical role in the CHEMNET[®] response organization.

Emergency Response to Mexico

In 1995, Code 3 personnel met with a group of chemical companies to discuss chemical emergency response options in Mexico. Through the course of significant research (including several trips to Mexico by several elements of the group), it was determined that very limited capabilities and equipment existed in Mexico to make a formidable response to a major emergency. It was also determined that there was no mechanism in place to bring a specialist from the United States to Mexico to assist in an emergency situation and U.S. citizens traveling to Mexico to assist in an emergency response might be subject to arrest or detainment.

Code 3, Inc. has executed a contract with ESEMEX, a Mexican transporter that has responded to a number of chemical emergencies in Mexico. To supplement the capabilities of ESEMEX, Code 3, Inc. trained ESEMEX response personnel in accordance 29 CFR 1910.120. Code 3, Inc. assisted with the fabrication of two response units that are currently staged in Mexico City. In 1998 Code 3, Inc. will establish two additional response locations in central Mexico. Our response capabilities into Mexico are further enhanced by our strong border presence in Harlingen, Laredo and El Paso, Texas.

Remediation and Field Services

Code 3's personnel are experienced in all types of media sampling, analysis and interpretation of environmental data, and the implementation of remedial designs and actions at sites impacted with hazardous materials / waste. Code 3 provides our clients with the latest remediation technology and project management innovations necessary to resolve any environmental situation that may occur in a cost-effective manner. Specific services include:

Remediation

- Implementation of Engineered Remedial Design & Remedial Action Plans
- Facility Decontamination and Demolition
- Facility Closure
- Immobilization and Stabilization
- Bio-Remediation
- Aquifer Restoration
- Soil Excavation
- Asbestos Abatement
- Lab Packing Services
- Soil Oxidation
- Disposal Management

- Post-Disaster Cleanup
- Pond closures

Hazardous Waste Management, Investigation & Remediation

- Compliance Audits
- Development and Implementation of Compliance Plans
- Waste Minimization Programs
- Remedial Investigation/Feasibility
- Remedial Design/Remedial Action (RD/RA)
- Hazardous Waste Classification
- Disposal Management

Petroleum Storage Tanks (PST)

- PST Management
- Limited Site Assessment (LSA)

Leaking Petroleum Tank Management (LPST)

- Pre-approval of Remedial Cost Plans
- Consulting
- Design and Implementation of Remedial Plans
- Waste Management
- Closure Reporting

Monitoring

- Ambient Air Sampling
- Groundwater
- Soils
- Water and Wastewater

Other Field Services

- Environmental Construction
- Site Supervision
- Direct push probe and hollow stem auger drilling

Significant project examples are outlined below:

Civil Engineering/Environmental Science Consulting Services; Major Chemical Company; May 1996: Code 3's civil engineers and hydrogeologists assessed and negotiated Risk Reduction Standard (RRS) 2 closures for a fixed facility in Texas. The project included the closure under Risk Reduction Standard 2 utilizing synthetic characteristic leachate procedure where hydrocarbons and metals were present.

Comprehensive Site Assessment/Site Remediation/ Soil Stabilization; U.S. Government Agency; January 1997: Code 3 was contacted to initially perform a sub-surface investigation at a 4.4-acre construction site. During preliminary construction activities, the general contractor noticed small fragments of lead/acid batteries and subsequently retained professional site investigation and consulting services. Code 3's site investigation team consisting of environmental engineers,

hydrogeologists, and technicians mobilized to the site for an inspection of the location. The team developed an extensive sub-surface design to fully delineate the vertical and horizontal extent of contamination at the site. Code 3, utilizing its direct push drilling rig, began extracting soil samples and establishing monitor wells per the established sampling plan. Analytical results indicated high levels of lead contamination throughout the site; however, the majority of the contamination was located in the subsurface parking garage of the facility. Therefore, the client requested that Code 3 excavate the basement area and other contaminated areas that were above lead background levels. Code 3 excavated approximately 29,000 cubic yards of soil and 19,800 cubic yards were considered to be Class I, II or hazardous. Code 3's remediation division excavated the basement to construction specifications in less than twelve days. During excavation activities, Code 3's industrial hygiene division performed the perimeter and personnel monitoring to ensure that levels of airborne contaminants did not exceed regulatory standards. The contaminated soils were segregated according to hazard class and base line testing was performed to determine the most feasible treatment process to lower the hazard level in the soil. This was done to save the client money during the waste disposal phase of the project. Code 3's bench testing indicated that soil stabilization was the most cost effective approach and the soil was treated and stabilized, leaving less than 500 cubic yards of Class I soil which saved the client hundreds of thousands of dollars in hazardous waste disposal. Code 3 is currently studying water treatment processes and options to mitigate any possible groundwater contamination.

Commodity Flow Studies; Bonding Agency; September 1996: A bonding agency contacted Code 3 to perform a hazardous material route and feasibility study. The purpose of the study was to specifically determine the volume of hazardous material crossing the International Bridges in Laredo, Texas and to determine the feasibility of a private hazardous material toll road.

Monitor Well Installation/Subsurface Investigation; Oil Refinery; March 1997: Code 3 was retained to utilize its direct push rig to install monitoring wells and representative samples from selected areas at the facility to evaluate potential subsurface contamination. Code 3's site investigation team completed ten monitoring wells and extracted sixty-nine 14' borings. The samples were submitted to a laboratory for further analysis.

Lead Facility Decontamination: U.S. Border Patrol; March 1996: Code 3 was awarded a competitive bid for the removal and disposal of bulk lead ammunition and lead dust from interior surfaces of an indoor shooting range. The shooting range was 4,500 sq./ft. facility and required technicians to perform wall washing and steam cleaning. The project was completed under budget.

PCB Remediation; Utility Company; November 1996: Code 3 provided emergency response, regulatory support, and site remediation services for a 25-gallon release of polychlorinated biphenyl's (PCBs). A flatbed trailer transporting 80 transformers was involved in a mishap which caused the transformers to collide, subsequently causing the release of PCB's from five of the transformers. The Strike Team arrived within 16 minutes of notification and began containing the spill. The transformers were then unloaded and transported back to the utility company's yard. The leaking transformers were secured and transported separately. Team members then began immediate excavation of the 40' x 36' affected area. Samples were taken and immediately transported to an environmental laboratory for analysis. Upon confirmation that the spill had been remediated in compliance with the TNRCC guidelines, the excavated area was backfilled and a hot mix was spread over the area.

Soil Oxidation; Major Railroad Company; May 1996: Code 3 was contacted by client to provide remediation services in response to a train derailment that caused gross diesel contamination to an area 200 feet by 200 feet and approximately at a depth of 30 inches. Code 3 mobilized its environmental engineers, technicians, and proprietary delivery system to the site. Upon arrival, personnel developed an in-situ remediation action plan consisting of soil oxidation and the injection of other nutrients to expedite the remediation process. The project duration was approximately 60 days and successfully reduced TPH levels from 350,000 mg./kg. to less than 500 mg./kg. which saved the company thousands of dollars in remediation and disposal costs.

Tank Cleaning/Tank Demolition; Liquid Bulk Storage Facility; February, 1996: A client with two 50,000 barrel tanks containing vacuum gas oil determined that it was necessary to eliminate the tanks to successfully sell the property. Code 3 was requested to mobilize sufficient personnel and equipment to successfully complete the operation within 24 days to meet critical real estate closing criteria. As usual, Code 3 personnel rose to the occasion, completing the project four days ahead of schedule.

Buried Explosives; Property Owner; August 1997 – October 1997: Approximately 400 pounds of nitro-based dynamite was buried at a depth of eight to ten feet in 1987. Nitro-based dynamite is significantly more unstable than ammonium-based dynamite. The buried dynamite was within 500 feet of a multi million dollar ranch home and within ¼ of a mile of a pipeline transporting sour crude oil which contained H₂S gas. Code 3, Inc. was contracted to investigate the site and take necessary remedial activities to remove the hazard.

Code 3, Inc. conducted a subsurface investigation utilizing ground-penetrating radar to identify the exact location of the buried dynamite. Additional subsurface investigation was conducted with a direct push drill rig to evaluate the soil matrix and potential subsurface contamination surrounding the dynamite burial site. Code 3, Inc. also conducted extensive interviews with all personnel working on the ranch that could have potential knowledge of the manufacturer of the dynamite and other relevant information that could assist Code 3, Inc. with the investigation phase of the project.

After a remedial action plan was developed and the precise location of the dynamite was located, Code 3, Inc.'s Reactive and Explosives Disposal (RED) team carefully excavated the dynamite using heavy equipment and hand excavation. After removal, due to the unstable condition of the dynamite, it was transported to a safe location on the ranch and detonated on-site. Prior to excavation, special trenches were excavated around the perimeter of the site to absorb any subsurface shock wave that might result from the accidental detonation of the dynamite during the removal activities. This project was closely coordinated with the Texas Natural Resource Conservation Commission and ATF.

Unknown Material Response (Utilization of Remote Opening Device); Custom Broker; January 1997: A client had sixty-nine (69) 55-gallon drums of unknown substances stored at the facility when the TNRCC conducted an unannounced facility inspection. Subsequently, the TNRCC issued a Notice of Violation (NOV) to the facility for violations of the state's solid waste regulations. The client contracted Code 3 to provide environmental and regulatory consulting and abatement services. In accordance with OSHA regulations governing response to unknown materials (29 CFR 1910.120, section j), Code 3 facilitated remote drum opening of the containers from a distance of 75 feet. Code 3 performed field analysis using field Haz-Cat methods for each of the drums to reduce the amount of laboratory analysis needed. Code 3 identified and

completed waste profiling of the various waste streams. The waste profiles were then submitted to a Treatment Storage and Disposal (TSD) facility for approval. After approval by the TSD and TNRCC, the waste was transported to the TSD for disposal. Code 3 then responded to the NOV on behalf of the client to the satisfaction of the TNRCC.

Training Services

Code 3, Inc. provides a full range of quality environmental training services to support environmental management programs and for compliance with environmental, health and safety regulatory requirements. These programs are oriented toward the “real world” application of environmental technology and provide the student with simulated “hands-on” experience using current standard-of-care equipment. Code 3, Inc.’s professional instructors bring years of field experience into the classroom and provide unique perspectives on environmental management.

As a result of Code 3, Inc.’s extensive environmental experience, it is uniquely qualified to provide occupational safety and health, as well as hazardous materials training that meets or exceeds all federal, state and local regulatory requirements. The training division is staffed with experienced, highly capable instructors that are recognized leaders in the industry. Code 3, Inc. provides trainees with the most up-to-date information, latest technology and hands-on experience. Training programs can be designed to custom fit a specific industry or facility according to the clients specific industrial classification code regulations. Code 3, Inc. offers training programs at our training facility or at our client’s facility.

Code 3, Inc.’s training programs include:

- Hazardous Materials Waste Operations and Emergency Response
- Emergency Response to Haz-Mat Incidents - Awareness Level
- Emergency Response to Haz-Mat Incidents - Operations Level
- Emergency Response to Haz-Mat Incidents - Technician Level
- Emergency Response to Haz-Mat Incidents - Specialist Level
- Incident Command
- Forklift Operators Certification
- Hazardous Materials Refresher
- Oil Spill Response
- HM 181 and 126 F
- Hazard Communication
- Self-Contained Breathing Apparatus
- Confined Space Entry and Rescue
- CPR and First Aid
- Toxicology
- Hazardous Materials Recognition and Identification
- Response Chemistry
- Field Sampling Methodology
- Air Monitoring
- Dangerous Goods Regulations (IATA)
- Use and Maintenance of Personal Protective Equipment
- Industrial Emergency Preparedness

- Workplace Ergonomics
- Accident Investigation and Prevention
- Introduction to RCRA

Summary course descriptions are outlined below:

Incident Command Training (8 Hour) 29 CFR 1910.120 Section q 6 (v)

Code 3, Inc.'s Incident Command System (ICS) training program addresses the following topics: need for a management system; history of the ICS; development of regulations and standards; using the ICS effectively; ICS operating requirements; and ICS structural chart. The major personnel roles of the ICS for general staff, command staff and staging are addressed and include command, operations, planning, logistics and finance. Additional topics include contingency plan activation and the ICS, implementation procedures, response procedures, emergency notification procedures, media considerations and material safety data sheets.

HAZWOPER Technician (40 Hour) 29 CFR 1910.120 Section q

This program meets the requirements of 1910.120 Section q which states that hazardous materials technicians, members of Haz-Mat teams, and all who respond to stop the emergencies involved with hazardous chemical spills shall be competent in these areas: emergency response plan implementation; use of field equipment for classification, identification, and verification of chemicals; selection of personal protective equipment; risk and hazard assessment techniques; incident command system; decontamination; and the chemical and toxicological terminology and behavior.

HAZWOPER Refresher (8 Hours) 29 CFR 1910.120 Sections e, p, and q

This program is for personnel who have previously completed the training in accordance with 29 CFR 1910.120 Sections e and q. This training meets the refresher requirements for site workers, TSDF workers, and emergency response workers. This training addresses site specific health and safety plans, hazards present on site, use of personal protective equipment, work practices for minimizing risk hazards, equipment safety, engineering controls, medical surveillance requirements and other topics addressed in the HAZWOPER 40 hour program.

Confined Space Entry and Rescue Training (16 Hours) 29 CFR 1910.146

Code 3, Inc.'s training program will follow the guidelines set forth in 1910.146. Students will be trained to proficiency in the following areas: duties of entrants including knowledge of hazards, equipment usage, communication system, warning signs and symptoms, exit procedure and alarm system; duties of attendants including knowledge of hazards in space, equipment usage, symptoms associated with hazard, communication system, monitoring system inside/outside space, how to summon the appropriate rescue service, how to guard against unauthorized entry, non-entry rescue; duties of entry supervisors including knowledge of hazards, verification of all on site testing and monitoring equipment, entry termination, verification of available rescue services, removal of unauthorized personnel, determination of appropriate transfer of permit space dictated by hazard and operation; rescue and emergency services to ensure that all members are trained, assigned duties, practice rescue procedures and trained in first aid; communication with outside rescue service to inform of all entry hazards, provide access to

permit space and facilitate all non-entry rescue retrieval systems; and review of pre-entry steps, personal protective clothing, breathing apparatus, emergency response plan and rescue equipment.

Significant project examples are outlined below:

Bilingual Training; Manufacturing Company; February 1997: Code 3's Occupational Safety and Health Training Division developed a specialized hazardous material training program in Spanish for the client. Code 3's bilingual training instructors additionally conducted a one week training program in Mexico for the only private response contractor in Mexico with specially developed courses for transportation incidents. Code 3 has 20 responders who are fluent in Spanish.

Environmental & Occupational Safety and Health Services

Code 3, Inc. provides its clients with proven and tested Environmental and Occupational Safety and Health consulting services for both private and public institutions. Code 3, Inc. assists clients with the difficult task of complying with the numerous regulations in place today. When it comes to providing on-site specialists, no one does it better than Code 3, Inc. Our specialists have assisted clients with the reduction of workers' compensation insurance premiums, responded to TNRCC Notice of Violation letters, emergency contingency planning and expert witness testimony.

Specific services include:

- Job Safety Analysis
- Workplace Ergonomic Studies
- Workplace Hazard Identification
- Hazardous Materials Inventory Management
- Industrial and Hazardous Waste Minimization
- Solid Waste Management Programs
- Emergency Planning Activities
- Fire Protection and Engineering
- Hazard Vulnerability and Risk Assessments
- Workers' compensation analysis
- Health and Safety Plans
- Industrial Contingency Planning
- Accident Investigation
- AHERA Inspections and Management Plans

Significant project examples are outlined below:

Air Monitoring / Industrial Hygiene

Air Monitoring/Health and Safety Evaluation; Fixed Facility; August 1996: Code 3 responded to a leaking tank containing 1,500 lbs. of anhydrous ammonia. An early morning thunderstorm created a power shortage causing the compressors to shut down. This created a build-up of pressure and subsequent release from the tank. A monitoring plan was designed and facilitated via Code 3's CAMEO system. Code 3's Strike Team, working in conjunction with the local fire department and the TNRCC's on-scene coordinator, evacuated a four-block area (approximately

45 residents) based on air monitoring of the area. Team members then donned Level A protective gear and entered the hot zone to close the main leaking valve. The entry team successfully controlled and mitigated the release of ammonia into the atmosphere without injury.

Safety / Plant Services

Safety Team; Fixed Facility; January 1998: Code 3 was selected to provide a three person team to perform general safety services, write work permits and write confined space permits for a major petrochemical facility. Code 3, Inc. personnel office at the facility and work in the plant for 40 hours per week.

5.0 – CERTIFICATES AND REGISTRATIONS

- CHEMNET® Contractor
- State of Texas CMBL Number (1742674917600)
- State of Texas Department of Health Asbestos Consultant Agency (22190)
- US Coast Guard OSRO (96-127)
- State of Texas Solid Waste Registration Number (83064)
- EPA ID Number (TNR000000794)
- Texas General Land Office (96-002)

6.0 – SENIOR MANAGEMENT

Lee Thompson, CSP, CES (President / CEO)

Mr. Thompson has over eleven years of safety and environmental consulting experience. He received his B.S. in Occupational Safety and Health Engineering from the University of Oklahoma. He spent 6 years as the Emergency Management Coordinator, Safety Director, and County Fire Marshal for Counties in South Texas. Specific areas of expertise include workers' compensation (saving Cameron County 1.8 million dollars in a three year period) safety inspections and plans, international transportation of hazardous materials, hazardous waste classification, hazard categorization, confined space rescue, first aid and CPR instruction, all levels of hazardous material response and planning, hazardous materials storage and transportation regulations and OSHA regulatory compliance. He is an accredited Hazardous Material instructor, a Level II Fire Fighting Instructor, an emergency vehicle operations instructor and has received his advanced fire-fighting certificate. Mr. Thompson has accumulated over 1200 hours of hazardous materials training, nationwide and is certified as a Hazardous Materials Incident Commander by OSHA regulation 29 CFR 1910.120. Recent courses completed are the Union Pacific Railcar Safety Course in Pueblo, Colorado, Transportation Test Centers Railcar Specialist Course in Pueblo, Colorado, Texas A&M Universities Hazardous Materials Response School (past 5 years), and the Environmental Protection Agencies Hazardous Material Technician Level Course (6). He the Vice-Chairman of the Cameron County Local Emergency Planning Committee and the Rio Grande Valley Emergency Management Coordinating Council. He has served as Commissioner on the Emergency Services District and is currently retained as the District's consultant. His credentials also include being a Certified Peace Officer and Emergency Medical Technician. Mr. Thompson has served as the Project Manager for a four acre lead contaminated site remediation; numerous hazardous material commodity flow studies and risk and vulnerability analysis performed by Code 3 for Cameron County, Galveston County, City of El Paso, City of McAllen, City of Eagle Pass, City of Del Rio and the City of Laredo, Texas; in-situ soil oxidation remediation projects of hydrocarbon contaminated sites; tank truck roll-overs and transfers; major train derailments; rail car transfers of compressed gases; rail car emergency responses; the development of occupational safety and health plans; and emergency action plans. Mr. Thompson has made presentation across the United States pertaining to hazardous material emergency response and international hazardous material transportation. Most recently he has been selected by the State of Texas Attorney General Office to work on a committee pertaining to international transportation safety issues.

Tim O'Brien (Vice President of Operations)

Mr. O'Brien has over fourteen years of environmental consulting and management experience. He received his B.S. in Chemistry from the University of Wisconsin in 1983. Prior to joining Code 3 Tim spent three years as an environmental chemist and branch manager for USPCI, eight years in various principal roles, including president of Industrial Compliance, Inc. (now Terranext), and for the last three years he was employed by Southern Pacific Lines as a manager of environmental field operations. His specific areas of expertise include all aspects of emergency response, response chemistry, remedial plan development and implementation, project management and oversight, regulatory compliance, waste management program

development and management, compliance and transactional audits, site assessments, management of both CERCLA and RCRA projects, sampling, waste characterization, and project cost containment. Mr. O'Brien has served as the project manager for projects ranging from five hundred thousand to several million dollars. His specific project management duties have included project design, costing, planning, implementation, contractor oversight, QA/QC and site protocols.

Rick Roark (Vice President of Sales and Marketing)

Mr. Roark has over nine years of environmental experience. Prior to joining Code 3, he served as Vice President of EmTech Environmental Services, Inc. Mr. Roark has served in a variety of roles including project manager, project coordinator, and regulatory liaison. In the course of Mr. Roark's career in the environmental industry, he has served as a project manager or project coordinator on major industrial fires, facility explosions, Superfund sites, RCRA closures and remediation projects that have individually surpassed \$3,000,000.00 in costs. Mr. Roark's experience includes more than 500 environmental projects. He works closely with Code 3's major accounts to assure their needs are properly resourced by Code 3's various service divisions. Mr. Roark is a graduate of Texas Christian University and has more than 600 hours of specialized environmental training.

7.0 – KEY MANAGEMENT / PERSONNEL

Vince S. Abrigo (Response Coordinator/Instructor/Fire Fighter)

Mr. Abrigo has over five years of emergency response experience with more than 200 emergency responses. Mr. Abrigo is a Professional Fire Fighter with the McAllen Fire Department. He began his fire fighting career with the Weslaco Fire Department in 1987. His specific areas of expertise include course instruction and practical applications of numerous types of hazardous material response techniques, fire fighting, rescue, safety, flood plane rescue, fire prevention, vehicle rescue, low and high pressure liquid transfer, tank-truck and railcar emergency response, hazard categorization (Haz-Cat), Incident Command, site remediation plan implementation, incident and accident investigation, and self-contained breathing apparatus (SCBA) repair. Mr. Abrigo has over 550 hours of instruction in hazardous waste and emergency response training. Additionally, he has completed the Texas Fire Commission's Fire Inspection and Arson Investigation Course and currently serves as a Senior Instructor for the Rio Grande Valley Fire Academy.

Esteban (Steve) Alvarado (Houston District Manager)

Mr. Alvarado has eight years of experience in oil spill regulation and consultation. Most recently he spent three years as an Area Manager for the Texas General Land Office (TXGLO) - Oil Spill Prevention and Response Division at their Brownsville sector office. His primary duties while with the TXGLO included environmental regulatory enforcement, compliance, facility audits, and inspections of facilities regulated under OSPRA. Also, he was the State On-Scene Coordinator for oil spills and provided on-site expert advice for facilities engaged in oil spill response activities. Mr. Alvarado responded to well over 100 oil spills including two of the four major oil spills in Texas in 1995. Mr. Alvarado's principal responsibilities at Code 3 include the day-to-day operations of the Houston office, project management of oil spills and hazardous material incidents, sales and marketing, hazardous material and oil spill training, facility oil spill prevention and response plans, remedial plan implementation, waste management and disposal, international transportation consulting, and occupational safety and health consulting services. His specific areas of expertise include oil spill management and response, NIIMS incident command system, facility OSPRA plan development, exercise design and implementation, integration of the international unified command system, hazardous material emergency response, identification of unknown hazardous materials/substances and oil spill response training. Mr. Alvarado has served as a project manager for Code 3 during the Buffalo 292 and 286 oil spills in the Houston area and several hazardous material transportation incidents involving low and high-pressure liquid transfers. He has accumulated well over 550 hours of oil spill and hazardous material response training, as well as attending the National Oil Spill Control School - Galveston and the National Oil Spill Control School - Texas A&M- Corpus Christi Texas. He attended the Hazardous Material Highway Specialist course and the Union Pacific Tank Car Specialist course at Transportation Test Center in Pueblo, Colorado. He has conducted emergency response training in Mexico and provided consulting services to US Customs Services along the US/Mexico Border. He is a member of the Cameron County Local Emergency Planning Committee and currently serves as the LaSalle County Emergency Management Coordinator and Precinct 2 Constable.

Donny Anzualda (Project Manager)

Mr. Anzualda has over five years of emergency response and remediation experience as well as extensive oil spill response experience. His specific areas of expertise include the identification of unknown substances, railcar emergency response and large-scale remediation jobs. Mr. Anzualda, formerly of EmTech Environmental Services, Inc. responded to 3 of the 5 major Texas oil spills in 1995. He has personally responded to over 350 chemical emergencies in his career.

Kella "Panama" Baker III (Fort Worth District Manager)

Mr. Baker joined Code 3, Inc. in 1997 and currently serves as a project manager for special projects throughout the company. He has previously served as Operations Manager for Protect Environmental Services and was responsible for oversight of fieldwork, project estimates and client contact. Additionally Mr. Baker held various positions with EmTech Environmental Services, Inc. and was involved in numerous projects including major demolition sites and chemical identification, segregation and stabilization. He has managed emergency response projects that have involved asbestos, PCB's, chemical transfers, chlorine and styrene. Mr. Baker has received training in accordance with 29 CFR 1910.120 e 3 I and 29 CFR 1910.120 q 6 i-iii. Additionally, he has received his asbestos abatement certification and is a Class A CDL with an X endorsement.

Amado Cano, Jr. (Firefighter/Forman)

Mr. Cano has over three years of remedial and emergency response experience, responding to well over 125 hazardous materials responses. He is currently working on his B.S. in Fire Science at Texas A&M University in Kingsville Texas. Areas of study include pre-emergency planning, fire investigation, fire patterns, and arson cause and determination. Mr. Cano began his career with the McAllen Fire Department in 1986, where he currently serves as a shift Lieutenant. His specific areas of expertise include hazard categorization (Haz-Cat), tank truck emergencies, railcar construction and emergency response, and low and high-pressure liquids transfer and resource management. He has successfully completed the American Association of Railroads Tank Car Specialist Course in Pueblo, Colorado, AMOCO's Tank Car Safety Course, the Environmental Protection Agency's 40 hour Hazardous Materials Course at the Technician level and the Texas State Technical College 120 hour Emergency Response Course and currently holds an Advanced Fire Fighting Certificate with the Texas Commission of Fire Protection and a Hazardous Material Specialist under OSHA regulation 1910.120.

Ritney Chapmond (Safety Officer/Project Manager, San Antonio)

Mr. Chapmond joined Code 3 in 1997 and serves as a local safety officer and project manager. Prior to joining Code 3, Ritney served as a hazardous materials technician and project manager for EmTech Environmental Services, Inc. for six years. Mr. Chapmond has an extensive safety background and has completed numerous emergency and remediation projects safely and cost effectively. Mr. Chapmond has completed OSHA required training in accordance with 29 CFR 1910.120 sections e and q as well as 29 CFR 1910.146. In addition, Mr. Chapmond has completed 600 hours of law enforcement training and is eligible to become a licensed Texas Police Officer. Mr. Chapmond has personally responded to dozens of PCB spills for various public utility companies.

Brian Cole (Disposal Manager)

Mr. Cole joined Code 3, Inc. in 1996. He has received specialized hazardous waste management and disposal training from Texas A&M University. Mr. Cole has facilitated disposal activities for over 400 projects during his tenure with Code 3, Inc. In addition, he has provided emergency response support to numerous projects including Code 3, Inc.'s response to a fire involving over 2,000 drums of magnesium dross that ignited at a freight forwarding facility in Hidalgo County. He is currently based in San Antonio, Texas where he also serves as the District Resource Manager. Mr. Cole also served for two years in the US Air Force working with a unit specializing in hyperbaric therapy.

Chester Culley, CEP, CHMM (General Manager – Denver)

Mr. Culley has over 24 years of professional experience directing and managing environmental, hazardous material and environmental emergency response operations. His major project experience includes spill response and remediation; natural resource damage assessment; industrial hygiene programs; industrial wastewater treatment plant design, construction inspection, operations and maintenance; hazardous waste management, treatment and management; superfund site cleanup and assessment; landfill gas recovery design, operation and management; noise control; bio remediation, bioventing and thermal desorption of petroleum contaminated soils; and environmental assessments of leased properties. He has extensive railroad experience. Mr. Culley received a BA in Biology from California State University at Los Angeles.

Curtis Dominicak, CEM (Project Manager)

Mr. Dominicak is based in Code 3, Inc.'s Denver office. He has over 13 years of experience and is a Certified Environmental Manager and a Registered Engineer in Training. He has extensive personnel and project management experience. His project experience includes spill response and cleanup, environmental investigation and remediation reporting, environmental planning, permitting, solid and hazardous waste management and underground storage tank management. He has extensive project experience working with the railroad industry. He received his BS in Chemical Engineering from South Dakota School of Mines and Technology and his MBA from the Graduate School of Business Administration from the University of Colorado at Denver, Colorado.

Bob Galvan (Laredo Operations Manager)

Mr. Galvan has over four years of emergency response and remediation experience. His specific areas of expertise include the identification of unknown substances, waste disposal, railcar emergency response and large-scale remediation projects. Most notably, Mr. Galvan's experience includes work on an EPA Superfund project in Commerce, Texas involving excavation and remediation of approximately 20,000 cubic yards of arsenic contaminated soil. Mr. Galvan has responded to numerous incidents in Mexico and is fluent in Spanish.

Jose Garcia (Firefighter/Supervisor)

Mr. Garcia began his career with the Harlingen fire department in 1984, as a fire fighter. In 1993 he was promoted to the rank of Lieutenant. He serves as an Instructor at the Harlingen Fire Department ARFF Academy and has over 5 years of emergency response and remediation

experience. Mr. Garcia has achieved certification as an Advanced Fire Fighter, Advanced Aircraft rescue, Hazardous Materials Specialist, and an Emergency Medical Technician. He has received over 100 hours of training on incident command and has also attended the National Fire Academy for various training courses. Mr. Garcia's specific areas of expertise include the identification of unknown substances, Hazard Characterization (Haz-Cat), railcar emergency response, low and high-pressure liquid transfer and grid sampling procedures. He also has completed the Texas State Technical College 120-hour Emergency Response Course, the American Association of Railroad Tank Car Specialist Course and AMOCO's Tank Car Safety Course. Mr. Garcia is a member of the Cameron County Local Emergency Planning Committee.

Mark Henderson (Health and Safety Specialist)

Mr. Henderson is based in Houston and supports a major contract with a petroleum storage and distribution facility. He has an extensive safety background. He has received specialized training from the Texas A&M Fire Recruit Training School and is an Emergency Medical Technical (EMT). He received his BS Degree in Safety Engineering from Kennedy Western University and has four years of experience serving as a safety professional for various industrial facilities in the Gulf Coast area including Georgia Gulf, Chevron Chemical Co., and Lyondell Chemical. He is experienced in OSHA regulations regarding safety training, safety documentation, OSHA record keeping and incident reports and investigations.

Don Holding (San Antonio District Manager)

Mr. Holding has over nine years of experience in handling chemical and environmental emergencies. Most recently he spent seven years with EmTech Environmental Services, Inc. as a supervisor in EmTech's Fort Worth Office and subsequently as the manager of EmTech's San Antonio Office. Mr. Holding is a seasoned Project Manager who is experienced in a wide variety of chemical related tasks as well as remediation projects. He is currently Code 3's District Manager for the San Antonio office. His principal responsibilities at Code 3 include the day-to-day operations of the San Antonio office, project management of oil spills and hazardous material incidents, sales and marketing, hazardous material and oil spill training, facility oil spill prevention and response plans, remedial plan implementation, waste management and disposal, and international transportation and occupational safety and health consulting services. His specific areas of expertise include all aspects of hazardous material emergency response; remedial plan implementation; environmental regulatory compliance and hazardous material training.

Richard Hyde, CHMM (Project Manager)

Mr. Hyde is based in Code 3, Inc.'s Denver office. He is responsible for project management, technical oversight, regulatory oversight, health and safety oversight and site supervision for waste management, remediation and industrial service project. His project work includes hazardous waste management for large and small quantity generators, industrial services such as tank and vessel cleaning, decontamination and demolition, UST remediation, and soil and groundwater remediation. Mr. Hyde's regulatory expertise includes RCRA, CERCLA, TSCA, OSHA, and DOT regulations and a good working knowledge of CWA and CAA. He received a BA in Environmental Studies from State University of New York.

Gary Johnson (Project Manager)

Mr. Johnson is based in Code 3, Inc.'s Denver office and has over 14 years of experience in the petroleum and environmental industries. He has extensive project management experience including oversight of a \$2.8 million wood treatment facility remediation project in Portland, Oregon. He has performed RCRA and CERCLA remediation projects, soil and groundwater remediation system installations, underground and aboveground storage tank decommissioning, demolition and decontamination projects, emergency response and hazardous waste management. Mr. Johnson is a candidate for a BS degree from Metropolitan State College of Denver.

Eric Kelly (El Paso District Manager)

Mr. Kelly has more than eight years experience in the supervision of environmental field service operations and has responded to more than 300 emergency incidents for federal, state, public and private clients. Mr. Kelly has removed underground storage tanks and performed site remediation on over two hundred leaking underground storage tank sites. His experience also includes excavation, bioremediation and/or stabilization of over one million tons of contaminated soil.

John Longest, CHMM (Denver District Manager)

Mr. Longest is responsible for the overall management of Code 3, Inc.'s Denver office. He is involved in the project proposal and estimating process and is responsible for the overall business development of the organization. He has substantial experience designing, costing, planning and implementing surface and subsurface contaminant cleanups including the development and management of hazardous materials and waste sampling, handling, transportation and disposal protocols. He is familiar with waste characterization, waste management, on-site supervision of remedial action, emergency response and waste packaging. He received a BS in Industrial Technology from Eastern Illinois University.

Jose L. Martinez (Foreman)

Mr. Martinez received his B.B.A. and M.B.A. from Pan American University, Brownsville, Texas. He has over three years of experience in the management, coordination and supervision of field activities, including all subcontractor work. He has conducted surface water, soil and groundwater sampling and has been involved in remedial investigation of contaminated sites, underground storage tank investigations and air monitoring of fugitive emissions. He is also responsible for computer-assisted drafting and the application of statistical, database, spreadsheet and graphical software packages for project data analysis.

Pete Martinez (Health and Safety Specialist)

Mr. Martinez is based in Houston and supports a major contract with a petroleum storage and distribution facility. Pete Martinez has over twenty years of experience in the chemical, environmental, refining and hazardous waste industries. He has participated in extensive shut-downs and start-ups for a major oil refinery which were conducted without incident. He advised and supervised eight safety inspectors for a plant-wide renovation project in Skida, Algeria

(Africa) and inspected the work site and work force that consisted of 1200 multi-national workers. Additionally, he has supervised critical confined space entry projects. Mr. Martinez speaks Spanish fluently.

JT Ponder (Project Manager)

JT Ponder is a Licensed Underground Storage Tank On-Site Supervisor. He has over 150 hours of specialized hazardous materials and emergency response training including training in accordance with 29 CFR 1910.120 and 29 CFR 1910.146. He has supervised the cleaning, maintenance and piping installation for a large oil/water separator used for the treatment of stormwater runoff and the containment of spilled fuels associated with the off-loading of fuel tankers at a major municipal airport. JT has supervised field projects and crews of up to 30 personnel. He has responded to numerous oil/diesel fuel spills on major water bodies and is personally adept at managing and controlling migration of free hydrocarbon products. He is experienced and familiar with boom deployment techniques. He can operate any heavy equipment and maintains a Class A Commercial Drivers License. JT is knowledgeable and familiar with sample collection techniques and methodologies.

Clay Reid (Harlingen District Manager)

Mr. Reid received his B.S. from Tarleton State University in Stephenville, Texas in 1990. He joined the Code 3 Team in May 1996 as a Project Manager. Previously, Mr. Reid was an Area Operations Manager for ITAPCO (Independent Terminal and Pipeline Company). His responsibilities included customer service and terminal operations for three liquid storage facilities, receipt and distribution of product, inventory control, and served as the liaison between the ITAPCO terminal and U.S. Customs Service. Clay also assisted in the development and implementation of budgets and capital improvements, was accountable for compliance with federal, state and local environmental regulations, reopened a diesel service terminal for PEMEX and participated in a 10 month Management Training Program at the ITAPCO Corporate Office in Houston, Texas. Mr. Reid's principal responsibilities at Code 3 include the day-to-day operations of the Harlingen office, project management of oil spills and hazardous material incidents, sales and marketing, remedial plan implementation, waste management and disposal, and international transportation consulting. Clay's areas of expertise include tank truck, railcar, above ground storage tank and terminal construction, design, and operation. He has served as a project manager for Code 3 on several hazardous material emergencies involving the transfer of high and low pressure liquids, truck roll-overs, railroad emergencies, industrial magnesium fires and subsequent site remediation, in-situ hydrocarbon site remediation using soil oxidation technologies, large and small tank cleanings, and hazardous material transportation compliance measurements. Mr. Reid has received several certifications including hazardous waste operations and emergency response (HAZWOPER), HM-126F, and HM-181, U.S. Coast Guard's Dock Training Course, and Union Pacific Railroad's Understanding Railroad Tank Car Course. Furthermore, Mr. Reid is bilingual in English and Spanish.

Trey Shaffer (Manager Information Systems)

Trey received his Bachelor's degree in Environmental Design from Texas A&M in 1987 and has worked in the environmental industry since that time. Mr. Shaffer's experience includes hazardous material emergency response and project coordination. Mr. Shaffer's specialized

training includes OSHA required Hazardous Materials Training. Formerly, Mr. Shaffer worked with EmTech Environmental Services, Inc. and held several positions including Fort Worth Regional Sales Manager; Assistant General Manager, and Project Estimator. He has produced detailed technical proposals with a combined value of more than \$30 million. Proposed work has included pond closures; site closures; facility decontamination; subsurface remediation and investigation, tank cleaning, UST removals, waste neutralization and processing and emergency response work. He has also formerly served as the Corporate Marketing Manager for Maxim Engineers. Trey's current responsibilities for Code 3, Inc. include management and oversight of all major proposals and overall management of Code 3, Inc.'s information systems.

Alisa Shelton (Technical Services Consultant)

Ms. Shelton has extensive experience supporting chemical and oil spill emergency response projects. She supports Code 3's efforts in Houston Texas and markets petrochemical and transportation clients in the region.

David Sowell (Technical Services Consultant)

David Sowell has broad experience managing and responding to chemical spills on an emergency basis. He has been responsible for all aspects of emergency and remedial actions on projects ranging in value from \$2,000.00 to in excess of \$1,000,000.00. He has extensive disposal management experience and has been responsible for disposing of wastes from all DOT classes of hazardous materials. David has completed OSHA required training in accordance with 29 CFR 1910.120 sections e and q. He has also completed confined space training in accordance with 29 CFR 1910.146.

Buddy Spretz (Technical Services Consultant)

Mr. Spretz has a broad background providing environmental services to the petrochemical industry in the gulf coast area of Texas. Mr. Spretz is a Registered Environmental Manager and has served as a liaison for numerous customers on large scale environmental remediation projects for the petrochemical, oil and gas, and pulp and paper industries.

Gualberto Torres (Firefighter/Supervisor/Instructor)

Mr. Torres has more than 20 years of emergency response experience and over 4 years of remediation experience. He began his career with the Harlingen Fire Department in 1964 where he has served as a Captain for the past eight years. Specific areas of expertise are the recognition and identification of hazardous materials, site safety, radiological monitoring, and Incident Command. Mr. Torres has obtained certification as a Master Fire Fighter, Emergency Medical Technician, and Care Attendant. Recent courses completed are the U.S. Environmental Protection Agency's 40-hour Hazardous Materials Technician Course, AMOCO's Emergency Response to Tank Car Emergencies, Texas A&M's Incident Command Systems Course, Excavation Safety Course, Managing Company Tactical Operations, Confined Space Rescue, and Initial Response to Hazardous Materials Incidents - Concept Implementation.

Gary Winn (Emergency Response Manager – Houston)

Mr. Winn has eight years of experience in emergency response with emphasis on hazardous materials. His responsibilities include response to tanker and pipeline incidents, intermodal

tanks, rail cars, abandoned unidentified drums, hazardous chemical fires, destruction of high-pressure cylinders and other transportation incidents. He has received training in the following areas radiological monitoring, 40 Hour HAZWOPER, cargo tank familiarization (Mission Companies), hazardous materials recognition and identification and marine survival training. Additionally he has received his basic firefighter certification and is currently a Houston Fire Department Hazardous Materials Technician.

8.0 – ASSOCIATES

Maribel Bermudez (Associate Environmental Scientist)

Ms. Bermudez received her B.S. in Biology from the University of Texas at Brownsville in 1994. Maribel has performed Phase I Environmental Site Assessments and has assisted on projects relating to leaking petroleum storage tank investigation, hazardous waste management and emergency hazardous materials response activities. Prior to joining Code 3, she worked for the U.S. Fish and Wildlife Service at Laguna Atascosa National Wildlife Refuge. Her responsibilities included conducting and supervising water sample collection and laboratory analytical testing efforts; planning restoration and conservation of wetland areas; identifying and recording refuge vegetation; surveying of bird migration patterns including bird banding; and performing radio-telemetry investigations of endangered species. Ms. Bermudez also has comprehensive experience with endangered species regulations and their impact on property ownership.

Jaime Flores (Associate Geologist)

Mr. Flores received his B.S. in Geology from Baylor University in 1993. Mr. Flores has conducted Phase I & II Environmental Site Assessments; Limited Site Assessments; environmental and geotechnical logging and sampling for soil, soil vapor and groundwater; monitor well installation; geotechnical engineering investigations; and has assisted on projects relating to leaking petroleum storage tank investigations encompassing plume delineation, hazardous waste management and emergency hazardous materials response activities. Prior to joining Code 3, Jaime worked for an environmental and construction service firm where his duties included geotechnical and environmental sampling; geotechnical engineering; site assessments; petroleum storage tank investigations; monitor well installation; quarterly sampling events; and project management and construction supervision for municipal solid waste Subtitle D landfills.

J. Robin Gelston (Senior Scientist/Project Manager)

Ms. Gelston received her B.A. in Biology from the University of California at San Diego and her M.S. in Environmental Science from the University of Texas at Dallas in 1983. She is a member of the National Society of Environmental Scientists and has received safety certification in Level B Personal Protection and supervisory training in health and safety practices for hazardous material handling and emergency response. Ms. Gelston has been involved in the reclassification of industrial waste at a petroleum refinery, numerous environmental compliance audits, written work plans and quality assurance/quality control plans for remedial investigation, RCRA facility investigations, and performed RCRA feasibility studies. She was previously the State Coordinator for the Texas Superfund program for the U.S. EPA and was responsible for bidding on all Texas federally funded National Priority List (NPL) sites as well as a project manager for an NPL site. Her principal duties included management of design services, supervising field teams, writing and reviewing work plans, conducting treatability studies and overseeing laboratory efforts. Ms. Gelston has conducted hydrogeological site investigations as a member of a project team responsible for writing Phase I Disposal Site Reports and Phase II Site Investigation Work Plans for the metals operable unit of an NPL site under an administrative

order between the EPA, DOE, and DOI. Ms. Gelston is experienced in the performance of environmental impact statements including the identification of endangered species and the impacts on aquatic and terrestrial environments. Additionally, Ms. Gelston has experience in the performance of environmental assessments, biological surveys, and regulatory compliance.

David A. Hanawa, M.S. (Consultant / Engineer)

Mr. Hanawa has over twenty-one years of consulting experience. He received his B.S. and M.S. in Mechanical Engineering from Texas A&M University in College Station, Texas. He spent four years as a principal with Asbestos Technology and six years with Exxon as a facilities engineer of plant design and optimization of facilities containing asbestos. Specific areas of expertise include asbestos inspections and management plans, abatement specifications, project management, air quality monitoring, environmental assessments/audits and underground storage tanks, remedial plan design and implementation, emergency action plan development, exercise design and implementation, computer program design, communication systems and response resource management. He has extensive experience in industrial plants and commercial building construction and has conducted over 250 environmental assessments, audits, asbestos inspections and remedial investigations. Mr. Hanawa is a TDH licensed asbestos consultant and an Asbestos Hazard Emergency Response Act (AHERA) accredited inspector, management planner and project designer. He has served as a project manager on numerous superfund site remediation projects, tank truck and facility emergency response and the development of emergency action plans for numerous facilities. Mr. Hanawa has been active with the Cameron County Local Emergency Planning Committee for over three years and is currently the chairperson. Mr. Hanawa is also a Certified Peace Officer in the State of Texas.

Marc Haws, P.G., REM, CEA (Senior Geologist/Project Manager)

Mr. Haws received his B.S. in Geology from the University of Texas at Austin in 1986. He is a registered Professional Geologist and Environmental Manager, Certified Environmental Manager and Wetlands Delineator. He has eight years of experience in environmental regulatory and environmental consulting fields. His principal responsibilities at Code 3 include the management of projects, including environmental site assessments for commercial property transactions, leaking petroleum storage tank (LPST) assessment and remediation, industrial storm water compliance, hazardous waste management and wetlands delineation. Prior to joining Code 3, Mr. Haws served as an environmental quality specialist for the Texas Water Commission (TWC) District 11 Office in Weslaco (now the Texas Natural Resource Conservation Commission, Region 15). His principal duties at the TWC involved implementing the State of Texas Petroleum Storage Tank (PST) program in South Texas. In addition to PST activities, Mr. Haws participated in the TWC's Hazardous and Solid Waste program and the implementation of federal RCRA regulations for industrial facilities. Other responsibilities included regulatory management, inspection of municipal and industrial wastewater facilities, water quality monitoring of the Rio Grande River and Gulf Coast, and emergency spill response and complaint investigations. Marc's extensive experience gives him valuable insight in dealing with environmental and public health concerns associated with general environmental regulatory compliance issues.

John Hinojosa (Senior Scientist)

Mr. Hinojosa has over thirteen years of experience in the water resource management field. He received his B.S. in Agricultural Economics from Texas A&M in 1982 and served as assistant Rio Grande Watermaster from 1982 to 1985. He was appointed Rio Grande Basin Watermaster by the Executive Director of the Texas Water Commission in 1985. He served as Watermaster for ten years and was responsible for the monitoring, allocation and management of the Rio Grande's water rights appropriations system. During his tenure, Mr. Hinojosa served on a number of state, regional, and local water resource management and planning committees including the Texas Water Bank Committee LRGV (Texas Water Development Board), Lower Rio Grande Basin Study Coordinating Committee (Bureau of Reclamation), Texas Clean Rivers Act Overview Steering Committee (TNRCC), and the Basin Planning and Watershed Management Committee (TNRCC). In an advisory capacity, Mr. Hinojosa served the Valley Water Committee and the Lower Rio Grande Valley Water Policy and Management Council. He has been instrumental in the development and implementation of water resource management policy for the Rio Grande and has testified before administrative agencies and State legislative committees regarding national and international water issues. He is an expert in water resource planning and management, and water rights policy and regulations.

Hector J. Lopez, P.E. (Senior Engineer)

Mr. Lopez has over eight years of environmental and geotechnical consulting experience. He received his B.S. and M.S. degrees in Geology and a B.S. in Civil Engineering from Texas A&M University. Mr. Lopez is a registered professional engineer in the State of Texas. Mr. Lopez has been involved in environmental, hydrogeological, and geotechnical site evaluations for numerous commercial projects. His activities have included proposal preparation, coordination and management of project work, data acquisition and analyses, report writing, and development of remedial action alternatives. He has participated in Superfund projects including development of *in-situ* stabilization and evaluation work plans for remedial designs and preparation of various remedial investigation/feasibility studies (RI/FS) for CERCLA sites. Mr. Lopez has also conducted hydrogeological investigations for industrial facilities and designed remedial action plans (RAP) for several service station sites, including preparation of plans, estimates, and specifications for hydrocarbon recovery systems. In addition, he has prepared closure plans and cost estimates for solid waste management units; prepared State industrial air permits including air modeling of emissions; conducted geotechnical investigations for industrial facility expansions; performed construction surveillance of landfills and foundation pads; and conducted and supervised field activities for surface and subsurface investigations.

Carlos M. Marin, Ph.D., P.E. (Consultant / Engineer)

Dr. Marin has over eighteen years of consulting experience working with both private and public sector clients to identify and limit their environmental liabilities. He received his B.S. in Civil Engineering and M.S. in Environmental Engineering from Rice University in Houston, Texas, and his Ph.D. in Environmental Engineering from Harvard University. Dr. Marin is a registered professional engineer (P.E.) in the State of Texas and was a member of the faculty at Duke University's School of Engineering and Environmental Studies. His specific areas of expertise include: EPA/TNRCC/SEDESOL general regulatory compliance, risk/uncertainty analysis, water resource systems planning and management, waste minimization and environmental

audits, environmental site risk assessments and remediation, statistical sample design and inference, water pollution control, and wastewater planning, operations and management. In addition to his private sector experience, Dr. Marin has worked extensively with the regulatory community. This has included projects for the World Bank and the governments of Venezuela, Mexico and Portugal. He has also been heavily involved in helping communities structure their pretreatment programs, including the development of ordinances, inspection/sampling procedures, waste minimization audits, toxicity reduction evaluations, enforcement response plans and derivation of local limits. Dr. Marin is the author of numerous publications, is invited presentations, and was the U.S. representative to the water quality committee of the International Association of Hydrologic Sciences. Finally, he also and speaks and writes Spanish fluently.

Glenn C. Millner, Ph.D. (Toxicologist)

Mr. Millner received a Ph.D. in Interdisciplinary Toxicology from the University of Arkansas for Medical Sciences in Little Rock Arkansas in 1988. He received a M.A. in Limnology from State University of New York College at Buffalo in 1979. He received a B.S. in Biology (with honors) from State University of New York College at Brockport, New York in 1976. Additionally, he received an A.S. in Biology/Chemistry (with honors) from Nassau Community College in 1974. Mr. Millner has extensive experience in environmental toxicology including risk assessments, endangered species surveys, facility studies and aquatic limnology. He has conducted and assisted in the defense of numerous Risk Assessments for industry, the EPA, the military, state and local agencies, and for various environmental consulting firms. He initiated a systematic study to evaluate the potential differences in the ability of several rodent species to metabolically activate a variety of weak and strong chemical carcinogens using the hepatocyte DNA repair assay. These studies are an important contribution to risk assessment for the selection of the most appropriate animal model, and for extrapolating across species by an appropriate chosen dosage scale.

Kim Morgan (Planning Specialist)

Ms. Morgan received her Bachelor's degree in Emergency Preparedness and Administration from the University of North Texas in Denton in 1993. She has over five years experience in working with federal agencies. Her experience includes managing and directing nationwide emergency response and recovery during federally declared natural disasters, establishing multiple offices in Washington D.C. for FEMA (Federal Emergency Management Agency) and contingency planning under the National Response Plan. Under the EPA (Environmental Protection Agency) she developed new methods of growth for the US/Mexico Border Program as well as working closely with the LEPC (Local Emergency Planning Committee) for local emergency preparedness.

Alan C. Nye, Ph.D. (Toxicologist)

Mr. Nye completed his Post-Doctoral Research, Duke University, Department of Pharmacology, Durham, North Carolina in 1986. Additionally, he received his Ph.D. in Interdisciplinary Toxicology from the University of Arkansas for Medical Sciences in Little Rock, Arkansas in 1986. She received a B.S. in Pharmacy from the University of Cincinnati, College of Pharmacy in Cincinnati, Ohio in 1980. Mr. Nye is an adjunct Instructor, University of Arkansas for Medical Sciences, Department of Pharmacology and Toxicology, Division of Toxicology. He has conducted and assisted in toxicological evaluations and risk assessments of Superfund and

non-Superfund hazardous waste sites for industry, states, and several environmental consulting firms. Also evaluated the health claims of persons exposed to environmental toxicants.

James E. Rumbo, P.E. (Project Manager)

Mr. Rumbo has over 20 years experience in the water resources and water quality field. He holds a Bachelor of Science degree from the University of Texas as well as graduate environmental computer modeling courses from Manhattan College, Bronx, New York. He has performed numerous water supply, water runoff, and water quality studies during his career, including planning and engineering of water/wastewater treatment system permits; reuse systems for municipal and industrial entities; and development of innovative water reuse and wastewater treatment options. As a former project manager for large projects with a major engineering company, Mr. Rumbo has managed water development projects ranging from Kuala Lumpur, Malaysia to Monterrey, Mexico. Central in all of these projects were concerns for source water quality, quantity, and cost effective delivery.

Mr. Rumbo has extensive associations that have fueled new ideas for projects. He is involved with World Water Corporation, a supplier of photovoltaic-powered pumps to the world. He is also past president and active member of the Central Texas Chapter of the Water Environment Federation. This year he was nominated for a seat on the policy committee for the municipal panel of TWCA. He also has been active on the water reuse committee of AWWA and has participated in development of drafts of 30 TAC Chapter 310 rules of TNRCC governing waters for reuse.

Auburn J. Steward (Information Systems / Research)

Ms. Steward received a M.L.I.S. from the University of Arkansas at Little Rock in 1985 and a B.A. in English and Education from Drury College in Springfield, Missouri in 1972. She is a Senior Member in the Academy of Health Information Professionals of the Medical Library Association. Ms. Steward provides information services through online searches of databases and through library research of other appropriate resources. Some of the areas for which information can be provided are: risk assessments, litigation support, medical surveillance, health and safety issues, industrial hygiene, federal regulations and project proposals. She has worked with the regional medical library network and the state library to coordinate participation in library networks that allow retrieval of library materials from all types of libraries throughout the region.

Joseph A. Tamayo, P.E. (Senior Engineer)

Mr. Tamayo has over twelve years of civil engineering experience. He has a B.S. in Civil Engineering from Notre Dame University and is a registered Professional Engineer in the State of Texas. He has developed expertise in a variety of fields by serving as project manager and principal design engineer on numerous civil engineering projects totaling in excess of nine million dollars in construction and design costs. He has extensive experience in dealing with local and State regulatory agencies. Since becoming associated with Code 3, Mr. Tamayo has been involved in managing and designing wastewater compliance projects and in providing technical support to Code 3's environmental assessment and petroleum storage tank projects.

Mona A. Tarkington (Industrial Hygienist)

Ms. Tarkington received a Master of Science in Occupational and Environmental Health from the University of Arkansas for Medical Sciences in 1995. She also received a Bachelor of Science in Biology from University of Central Arkansas in 1991. She is affiliated with the American Industrial Hygiene Association - National and Arkansas Local Section. Ms. Tarkington has experience as the site health and safety officer for a hazardous waste site, performing industrial hygiene sampling, responding to emergency responses, developing Site Health and Safety Plans, developing health and safety training programs, preparing reports for industrial hygiene surveys, and performing Phase I and Phase II Environmental Site Assessments. In addition, Ms. Tarkington has provided assistance in litigation support cases by reviewing, summarizing, indexing, and evaluating environmental and industrial hygiene sampling data. Ms. Tarkington has assisted senior toxicologists in statistical data analysis for Risk Assessment purposes. Ms. Tarkington has also received training in techniques for analyses, interpretations and mathematical modeling using a proprietary Graphical Problem-Solving Environment called PM-DIAMOND. Ms. Tarkington has performed industrial hygiene and environmental air sampling for various projects including the following: air sampling during ballast dumping studies for Southern Pacific Lines in Leadville, Colorado; personal and perimeter ambient air sampling during remediation activities at a superfund project in Houston, Texas; ambient air sampling during production of chemicals at a chemical manufacturing company in Eldorado, Arkansas; personal air sampling during paper processes at a paper company in Pine Bluff, Arkansas; and personal and area sampling during fuel tank storage cleaning activities at the Little Rock Air Force Base, Jacksonville, Arkansas. Ms. Tarkington has also conducted soil sampling at various sites that include: a superfund project, Phase II Environmental site assessment, and emergency responses. She has also performed water monitoring activities at emergency responses. Ms. Tarkington has experience with responding and assisting in emergency situations which involved releases of hazardous chemicals. The emergency responses have included major train derailments in Pando, Colorado and Appleby, Texas and an intermodal yard spill in Memphis, Tennessee for Southern Pacific Lines. Activities at the responses include personal and ambient air monitoring, devising appropriate sampling procedures, collecting meteorological data, and working with federal agencies in collecting air, soil, and water data. Supporting activities have included contacting vendors to obtain appropriate sampling equipment, and contacting laboratories to arrange and coordinate rush analysis of samples.

9.0 – INSURANCE COVERAGE / BONDING

Code 3, Inc. maintains the following insurance coverage:

General Liability	\$5 million per occurrence / aggregate
Professional Liability Including Pollution Legal Liability ...	\$5 million per claim / aggregate
Vehicle	\$5 million / including MCS-90
Workers Compensation	\$1 million

Bid, performance and payment bonds as required.

10.0 – PARTIAL LIST OF MAJOR CLIENTS**Transportation / Freight**

ABF Freight Systems, Inc.
ABI Transportation Company
ADC Forwarding, Inc.
Airborne Express
Alesa Forwarding
American Freightways, Inc.
Amer-Liquid Transport, Inc.
Arrow Transportation Company
Barrios Y Asociados, S.C.
Best Border Cargo, Inc.
Boxers Transfer
Brownsville Rio Grande Railroad Company
Burlington Air Express
C.D.S. Lines, Inc.
Cain Custom Brokers, Inc.
Cannon Express, Inc.
Celadon Trucking
Chem USA Corporation
Chemical Leaman Tank Lines
Coastal States Transportation
D'arri Guerro & Co.
Descargo Tex Forwarding, Inc.
Despachos del Norte
Dragon Equipment and Rentals
DSI Transports
Eagle Coach Corporation
Enterprise Transportation Company
Federal Express
Fidelity Bonded Warehouses
Genesis Forwarding, Inc.
Groendyke Transport, Inc.
Grupo GOR Transportes, S.A. de C.V.
Grupo Trajusa, S.A. de C.V.
Gulf Packing, Inc.
H&H Foods
Highway Transport, Inc.
IMEX Forwarding, Inc.
Interline Services, Inc.
Inter-Mex Transportes, S.A. de C.V.
International Chartering PLC
Inter-Transfer Corporation
Jefferson Forwarding, Inc.
Jett Forwarding, Inc.
Key Trucking, Inc.
King Forwarding Agency, Inc.
Leaseway Logistics
Matlack, Inc.
McKenzie Tank Lines, Inc.
MCX Transport, Inc.
Miller Transporters, Inc.
Mission Petroleum Carriers, Inc.
Overnight Transportation Services
Red Arrow Freight Line
Rich Sea Pack
Rio Grande City Fire Department
Rio Grande Switching Company, Inc.
ROA Forwarding Agency, Inc.
Rohm and Haas Trucking, Inc.
SCHNEIDER National
Service Transport Company
SISTA Forwarding, Inc.
Slay Transportation, Inc.
South Texas Traffic Company, Inc.
Southern Pacific Railroad Company
Southwestern Motor Transport, Inc.
Superior Carriers
TELLEBORG Viking, Inc.
Texas Forwarding Services, Inc.
Texas International Railway System
Texas Mexican Railway Company
Thomas Petroleum, Inc.
Trans Cargo International, Inc.
Transcontinental Forwarding
Transmaritime, Inc.
Transport Service Co.
Transportation Services, Inc.
Transportes Especializados del Altiplano
Trans-State Lines
Trans-Tex Lines
TRW Automotive
Twin City Exports, Inc.
Union Pacific Railroad Company
United Parcel Service
Valley International Airport
Valley Solvents and Chemical Co., Inc.
VIP Freight Forwarders, Inc.

Younger Brothers, Inc.
ZARGO Forwarding, Inc.

Schools / Universities

Brownsville ISD
Donna ISD
Texas State Technical College
Witney ISD

Government

Brownsville Navigation District
Cameron County
Cameron County, LEPC
Cameron County, Park Ranger Division
Cameron County, Sheriff's Department
City of Alamo
City of Alamo, Fire Department
City of Alton, Fire Department
City of Brownsville
City of Brownsville Fire Department
City of Donna
City of Donna Irrigation District
City of Donna, Texas Fire Department
City of Edinburg
City of Edinburg, Fire Department
City of Harlingen
City of Harlingen, Fire Department
City of Laredo
City of Laredo Health Department
City of Laredo, Fire Department
City of McAllen
City of Mercedes
City of Mission
City of Mission Fire Department
City of Pharr
City of San Benito
City of San Benito, Fire Department
City of San Juan
City of Weslaco
Emergency Management, State of Texas
Hidalgo County Health Department
Hidalgo County Sheriff's Department
Lower Rio Grande Valley Dev. Council
Office of Attorney General, State of Texas
Port of Brownsville, Texas
South Padre Island Fire Department
Texas Attorney General Office

Texas Department of Insurance
Texas Department of Public Safety
Texas Department of Transportation
Texas General Land Office
TNRCC
U.S. Coast Guard
U.S. Customs Service
U.S. Department of Agriculture
U.S. Department of Agriculture
U.S. Department of Transportation
U.S. Drug Enforcement Agency
U.S. Environmental Protection Agency
U.S. General Services Agency
U.S. Immigration and Naturalization Service

Utility

Brownsville Public Utilities Board
Central and Southwest Services, Inc.
City Public Service
Mission Hospital

Oil and Gas

CITGO Petroleum Corporation
Coastal Refining and Marketing, Inc.
Diamond M Onshore, Inc.
Discount Oil Company, Inc.
Dowell Slumberger
Duer Wagoner & Company
Halliburton Services, Inc.
Koch Gathering Company
Leyendecker Oil Company, Inc.
Marathon Oil Company
Mobil Exploration & Production U.S. Inc.
Pennzoil Companies, Inc.
Star Enterprise, Inc.
Sun Coast Resources, Inc.
Trans Texas Gas Corporation

Petrochemical / Industrial

Air Liquide
Akzo Nobel
BASF Corporation
Dow Chemical Company
DUPONT, USA / Mexico
EXXON Company, U.S.A
Fina Oil and Chemical Company
Hoechst Celanese

Rhone-Poulenc
Solvay Polymers
Vulcan Chemicals

Marine

Buffalo Marine
C&C Marine
Marine Services, Inc.

Manufacturing

Acetylene Oxygen Company
AMFELS
Asphalt Products, Inc.
Aviall, Inc.
Azteca Milling Co.
Corrpro Industries, Inc.
Dean Foods, Inc.
DIFCO, Inc.
Ewing Battery
Fruit of the Loom
Howell Corporation
Lambda Electronics, Inc.
Lamosa S.A. de C.V.
Lucent Technologies
Magnetek
MFC Corporation
Mid Valley Industries, Inc.
Norton Industries
San Antonio Shoes, Inc.
Sentex Corporation, Inc.
Unique Molded Products
Valley Baptist Medical Center
Valley Regional Medical Center
Zimco Marine, Inc.

Insurance

Universal Claims Service, Inc.

Legal

Constant & Vela Attorney at Law
Garza & Garza - Attorneys at Law
Gustavo T. Quintanilla, Attorney at Law
Kleberg & Head, Attorneys at Law
Willette & Trevino - Attorneys at Law

11.0 – EQUIPMENT AND MATERIALS

Code 3 maintains a broad inventory of equipment, tools, vehicles, and monitoring equipment dedicated to emergency response work.

Vehicles

Vehicle Number	Description	Year	License
101	Ford F350 Crew Cab 4x4	1996	ST3119
102	Ford F350 Crew Cab 4x4	1996	STE118
103	Ford F150 Supercab	1995	KP6010
104	Ford F350 Crew Cab	1996	KJ2449
105	Ford F350 Crew Cab	1995	PL5033
106	Ford F350 Crew Cab	1993	GY9580
107	Ford F250 Crew Cab	1997	VS8588
108	Ford F350 Crew Cab	1996	VS7905
110	Ford F350 Crew Cab Lift Gate		YH1360
007	Ford F350 Crew Cab	1997	TK2321
109	Ford F350 Crew Cab	1997	XZF99J
111	Ford F350 Crew Cab	1997	YK2466
112	Ford F350 Crew Cab	1997	YK2464
	Crown Victoria	1996	

Response Trailers / Vans

Unit Number	Description	Year	License
301	Wells Cargo 40'	1993	76TSJL
302	Wells Cargo 20'	1993	44TMNN
303	Acme Ecology	1995	
304	Big Tex 16'	1996	51VSYP
305	Big Tex 16'	1996	92TSVL
306	GMC Van	1994	4135NK
309	Wells Cargo 24'	1997	86VPPS
310	Well Cargo 24'	1997	20VSVT
311	Trailer, 24' K.P.		37VJNY

Supervisor Response Vehicle Inventory

800 mhz. company radio	Assorted respirator cartridges
Banner tape (Haz-Mat)	Barricade coveralls, hooded (Frontline)
Booties	Broom, Street
Brooms, Corn	Butyl Rubber gloves
Cellular telephone	Decon kits
Direct Reading Sample Pump and Tubes	Drum liners 6 mil.
Full-face respirators	Hand held company radio
Hand tools	Leak repair kit
M.S.A. mini-guard (L.E.L., O2 and CO)	Neoprene gloves
Nitrile gloves	pH paper
Poly Sheeting (20' x 100') roll	PVC coveralls, hooded
PVC gloves	Reference library
S.C.B.A.	Safety glasses
Sample gloves	Sample Jars
Saranex coveralls, hooded	Siphon Pumps (disposable)
Tank car rupture disks asst.	Valve wrenches

Response Trailer Inventory

17-E Drum (poly)	17-H Drum (steel)
20" x 100' Poly Sheeting rolls	250 lbs. Soda Ash (7 bags)
300 lbs. Oil Dry absorbent (10 bags)	8" x 10' Sorbent Booms
85-gallon salvage drum (poly)	85-gallon salvage drum (steel)
Barricade Encapsulated (Level B)	Breathing air (size J bottles)
Brooms	Bung wrench
Decon basin	Decon kit
Drum dolly	Drum liners, 6 mil.
Drum sling	Drum wrench
Duct Tape	Electrical extension cord
Eye and Face wash	Fire extinguisher
Flashlights	Gas cans (5 gallon)
Hand Tools (Shovels, etc.)	Hazardous Material banner tape
Latex Booties	Life Guard Responders (Level A)
M2 Pump	Neoprene Gloves No. 9-92
Nitrile Gloves (Solvex)	pH paper, roll or stick
Poly high density sprayer	PVC (Petroflex) gloves No. 12-214 24
Pylox Gloves	Replacement Air bottles
Respirators and Cartridges	S.C.B.A.
Safety glasses	Sample jar, 32 oz. (glass)
Saranex splash suit (Level C)	Sorbent Pads
Traffic Cones	Trash bags (75 per box)
Trauma kit	Water cooler

Transfer Equipment**Pumps / Compressors**

1" Aluminum diaphragm pump	1" Polyethylene diaphragm pump
1" Teflon lined Corken gas compressor	2" Aluminum diaphragm pump
2" Carbon steel centrifugal pump	2" Polyethylene diaphragm pump
2" Stainless Steel diaphragm pump	3" Carbon steel centrifugal pump
Corken Pump	100 CFM Compressor

Hose

Crosslinked polyethylene	LPG/Ammonia
Monel	Stainless steel braided
Stainless steel braided/teflon line	

Patch Tools and Equipment

"O" ring gasket kit	½" & ¾" drive socket sets
Aqua seal	Assorted pipe tools
Assorted pipe wrenches	Assorted plugs and patch
Chlorine A,B,C kits	Dome clamps
Edwards and Cromwell response kits	Gasket material
Goretex tape	Petro seal
Plug-n-Dike powder	Sheet teflon, neoprene, butyl, rubber, PVC
Teflon tape	

Oil Spill Equipment

3 gallon pump sprayers	4 hp saucer skimmers
Absorbent boom	Absorbent pads

Absorbent sweep	Anchor floats and anchors
Belt adhesion skimmer	Cellulose absorbents
Containment boom	Corn brooms
Floating vacuum saucer skimmers	Floating wash pumps
Leaf blowers	Leaf rakes
Life jackets	Pitch forks
Pressure pumps 2"	Response boats
Roll 500' ¾" rope	Roll banner tape
Roll drum liners	Roll trash bags
Scoop shovels	Skimpak skimmer
Utility work boats	Visqueen
Weed eaters	Weir/suction manta ray skimmers

Heavy Equipment

Case 580 Backhoe/Loader or Equivalent	Case 580 Backhoe/Loader or Equivalent
CAT 215 Excavator or Equivalent	CAT 215 Excavator or Equivalent
CAT 950 Rubber Tire Loader or Equivalent	CAT 950 Rubber Tire Loader or Equivalent
CAT 963 Track Loader or Equivalent	CAT 963 Track Loader or Equivalent
CAT D4H Dozer or Equivalent	CAT D4H Dozer or Equivalent

Sampling Equipment

Haz-Cat Sample Analysis	Area/Personal Air Monitor
Combustible/Oxygen Multiple Gas Detector	Direct Reading Toxic Gas Detector
Photoionization Detector	Mercury Vapor

Miscellaneous Equipment

Air Hammer	Computers
Coppus Fan/Air Driven Blower	Coring Machine
Frac Tank	Generator, 10 Kilowatt or less
Lights, Explosion Proof (Drop)	Lights, Quartz Demolition
Light Plant, 4000 Watt (Trailer)	Phone, Mobile
Pressure Washer – Cold 3,000 PSI	Pressure Washer – 10,000 PSI Hydroblaster
Pressure Washer – Heated 3,000 PSI	Radios, hand-held
Remote Drilling Apparatus	Roll - Off (20-25 yard)
Suit, Fire Repel Protective	Vacuum, HEPA
Vacuum, Mercury	

Materials

Absorbents, All Purpose (Granular)	Absorbents, Boom Oil
Absorbents, Dri-Zorb Hi-BTU	Absorbents, Fiberpearl
Absorbents, Mersorb	Absorbents, Pads Oil
Absorbents, Sawdust	Absorbents, Sweeps Oil
Bags (Hazmat), 6 mil. Clear	Bags (Hazmat), 6 mil. Clear (G.E.)
Booties - Latex - XL Overshoe	Booties - Saranex
Booties - Tyvek	Boxes, D.O.T. Shipping
Broom (Corn)	Broom (Street)
Brush, Decon	Buckets, 5 gal, D.O.T.
Buckets, Metal Open 5 gal	Cartridge - Organic Vapor (3M)
Cartridge - Acid Gas (3M)	Cartridge - Organic Vapor / Acid Gas Combination
Cartridge - Ammonia / Methyl Amine Combination	Cartridge - Multi-gas / Vapor (3M)
Cartridge - Mercury Vapor / Chlorine (3M)	Cartridge - Organic Vapor / P100 (3M)
Cartridge - Acid Gas / P100 (3M)	Cartridge - Organic Vapor/Acid Gas/P100 Combination

Code 3, Inc.

Cartridge - Ammonia/Methylamine/P100 Combination	Cartridge - Formaldehyde / Organic Vapor / P100 (3M)
Cartridge - Multi-gas / Vapor / P100 Combination (3M)	Cartridge - Mercury Vapor / Chlorine / P100 (3M)
Chemicals - Citric Acid (50 lb.)	Chemicals - HCl Acid
Chemicals - Lime (50 lb. Bag)	Chemicals - Mighty Red or Degreaser (Mixed Solution)
Chemicals - Muratic Acid	Chemicals - Soda Ash
Chemicals - Sodium Hypochlorite	Chemicals - Sulfamic Acid (50 lb. bag)
Decon Pools	Drum, 16 gal Poly Open
Drum, 16 gal Poly Closed	Drum, 30 gal Poly Closed
Drum, 30 gal Poly Open	Drum, 55 gal 17E Steel Closed
Drum, 55 gal 17H Steel Open	Drum, 55 gal Poly Closed
Drum, 55 gal Poly Open Top	Drum, 85 gal Poly Salvage
Drum, 85 gal Steel Salvage	Gloves, Liners
Gloves, 4-H	Gloves, Brown Jersey Cotton
Gloves, Butyl Rubber (11")	Gloves, Neoprene (Neox - 14")
Gloves, Nimble Fingers (Sample)	Gloves, Nitrile
Gloves, Petroflex	Gloves- Raw Hide Leather
Jars - 16 oz.	Jars - 32 oz.
Jars - 4 oz.	Jars - 8 oz./6 oz.
Jars - PCB Wipe	pH Sticks
Plastic Sheeting (8' x 100' x 2 mil.)	Plastic Sheeting (20' x 100' x 6 mil.)
PPE - Chem Boots	PPE - Safety Glasses
PPE - Steel Toe Rubber Boots	Pump, Barrel Siphon
Sample Scoops	Suit - Responder (encapsulated), Level A
Suit - CPF4 (encapsulated), Level B	Suit - CPF1 (without feet), Level C
Suit - CPF2 (with feet), Level C	Suit - CPF3 (with feet), Level C
Suit - Splash (PVC 500)	Suit - Tyvek
Suit - Rain Slicker	Tape, Caution (1000')
Tape, Duct	Tape, Haz Mat (1000')
Tubes, Colliwassa	Tubes, Detector
Vermiculite (6 cu ft bag)	Wipes, Disposable

12.0 – SPILL MANAGEMENT

Introduction and Statement of Command Concepts

- 1) **Planning Basis:** In order to carry out the assigned responsibilities delineated in the Department of Emergency Management's Hazardous Material Response Plan (DEM-10) and to comply with standards established by Federal legislation, the Code 3, Inc. Emergency Response Plan for Hazardous Materials is established. This plan will guide and direct the action of all responding Code 3, Inc. personnel at hazardous materials operations.

In the event of a significant accident or other incident involving a toxic or hazardous material where, because of fire, explosion, radioactivity, toxic air release or chemical reaction, there exists danger to the health or safety of emergency personnel or to the general public, a principal or senior representative, referred to as the Incident Commander (IC), at the scene will implement the Code 3, Inc. Emergency Response Plan (ERP) for Hazardous Materials.

- 2) **Agency Coordination:** This plan is built on the fundamental organization and strategy of the Code 3, Inc. Incident Command System (ICS) insuring maximum safety and efficiency of the operating forces while fulfilling our responsibility to the public.

It is assumed that all hazardous material incidents will be managed under the Unified Command principles, because in virtually all cases, fire, police, and public health agencies will have some statutory functional responsibility for incident mitigation.

All mitigation operations at the incident will be managed by Code 3, Inc. The Group/Sector Supervisors will carry out specific tactical objectives. Other needs will be met by staffing ICS positions.

Organizational Development

- 1) **Response Objectives and Strategy:** Any hazardous materials incident represents a potentially dangerous situation. Chemicals that are combustible, explosive, corrosive, toxic, or reactive, along with biological and radioactive materials can affect the general public or the environment. While the response activities needed at each incident are unique, there are similarities. One is that every response requires protecting the health and ensuring the safety of the responders.

This plan identifies the functions necessary to control and mitigate a hazardous materials incident. It also describes the lines of authority, responsibility, and communication between and among the various responders. It defines the interface of Code 3, Inc. with other agencies. Finally, it specifies the authority of each responder in directing specific operations.

This plan will provide instructions on how to accomplish specific tasks in a safe manner. In concept and principle, standard operating safety procedures are independent of the type of incident. Their applicability at a particular incident must be determined and necessary modifications made to match prevailing conditions. However, in the case of hazardous materials operations, the specific requirements of training, equipment, and

competence preclude the generalized statements that might apply to other types of emergency work.

The ERP will provide guidance for Code 3, Inc. responders in areas related to response, site control, entry, and mitigation of hazardous materials incidents.

The guidance is not meant to be comprehensive treatment of each of the subjects discussed. Formal training in these areas will complement this document. Specific training will provide more information for the technical, administrative, and management oriented skills needed to fulfill our mission. This document will provide standard operating guides to develop more specific procedures.

The priority of the instructions in this plan is as follows:

- a. Life Safety and health risks to the public and the emergency responders are the most important concern.
- b. Code 3, Inc. must stabilize the incident scene and prevent further escalation of the incident with minimum personal risk.
- c. Code 3, Inc.'s response efforts should be directed toward protecting property and minimizing or lessening the impact of the event on the environment.

- 2) **Incident Characterization:** In the same way that area fire units now call for additional assistance at a fire, hazardous materials incidents require that a method be established to determine the degree for severity for various types of releases. Response planning, procedures, and notifications to Federal, State, and Local agencies will be determined by the following standard designations.

Level 1: An incident which can be controlled by the responding unit (four technicians and a supervisor) and does not require evacuation of other than the involved structure of the immediate outdoor area. The incident is confined to a small area and does not pose an immediate threat to life or property, such as a diesel fuel spill. Additional resources may be transmitted at the discretion of the Code 3, Inc. On-Scene Commander. This may indicate a need to upgrade the incident to Level 2.

Level 2: An incident involving a greater hazard or a larger area which poses a potential threat to life or property and which may require a limited evacuation of the surrounding area. Generally requiring a response of four to six response technicians, safety officer and an On-Scene Commander.

Level 3: An incident involving a severe hazard or a large area which poses an extreme threat to life and property and will probably require a large-scale evacuation; or an incident requiring the expertise or resources of Local, State, and Federal, or other private agencies and organizations. Generally requiring the response of ten or more response technicians, safety officer, logistics manager, resource manager, operations manager and an On-Scene Commander.

Guidance Table: The following table is presented for guidance in determining these levels. The highest level for any single condition will determine the incident level. For example, poison gas (such as cyanide or phosgene) could initially require a Level 3 response due to the nature of the danger to the public. An incident level and the response

can always be downgraded when additional information or resources become available. However, it is much more difficult to upgrade and obtain control when situations are going beyond the capabilities of the on scene resources.

CONDITION	LEVEL ONE	LEVEL TWO	LEVEL THREE
PRODUCT	No DOT Placard Required ORM, A, B, C, D	DOT Placard PCB's / No Fire EPA Regulated Waste (asbestos) Any Unidentified Substance	Poison A Explosive A/B Organic Peroxide Flammable Solid Chlorine Fluorine Anhydrous Ammonia Radioactive PCB's on fire
NFPA # 704	0 or 1 all Categories	2 for any Category	3 Or 4 any Category Including Special Hazards
CONTAINER SIZE	Small (pail, drum, cylinder, package, bag)	Medium (one ton containers, portable containers, nurse tanks, multiple packages)	Large (tank cars / trucks, stationary tanks, hopper cars / trucks, multiple medium containers)
CONTAINER INTEGRITY	Not Damaged	Damaged but Serviceable for Handling or Transfer of Product	Damaged Catastrophic Rupture Possible
LEAK SEVERITY	No or Small Release Contained or Confined with Available Resources	Not Controllable without Special Resources or "Reportable Quantities"	May not be Controllable even with Special Resources
LIFE SAFETY	No Life Hazard	Local Area Limited Evacuation	Large Area Mass Evacuation
IMPACT ON ENVIRONMENT	Minimal	Moderate	Severe

- 3) **Response Organization:** Under the Incident Command System, the incident organization will develop in a modular progression depending on the exact nature and specific conditions prevailing at the scene. Code 3, Inc. shall operate under the unified command system with the Code 3, Inc. On-Scene Commander making recommendations to a facility or municipal Incident Commander and directing all Code 3, Inc. response operations.

Response Management: A response manager, on the initial call out, will manage the first response for Code 3, Inc. The response manager will be the On-Scene Commander. Responsibility will be transferred to succeeding personnel using the established lines of

authority within Code 3, Inc.'s management structure. All personnel at the response location will be made aware of any command change immediately.

The On-Scene Commander on the first alarm will implement the ERP for hazardous materials and assume responsibility for all command and command staff functions necessary to manage the initial response. The On-Scene Commander will call additional resources, as incident needs dictate.

Unified Command: A more complex operation requires a unified command structure composed of the senior officials of various agencies. They will determine strategies and objectives that will fulfill their individual responsibilities while coordinating the actions of their respective personnel through the On-scene Commander.

Communications Standard Operating Procedures

- 1) **Introduction:** Code 3 has created a 24-hour communications center in response to the need for professional and reliable dissemination of information and personnel notification. Highly trained professionals, who have the latest in communication technology at their disposal, staff Code 3's communication center. This staff responds to our client's request for assistance quickly, efficiently and professionally. Our dispatchers contact an on-call response manager by pager, telephone or provide direct communication patches at the request of our client, while simultaneously notifying on-call response personnel.
- 2) **Answering Telephones:** The telephone will be answered in a professional and courteous manner. Code 3's professionalism will set the tone for customer relations during the project. The following procedures must be adhered to when answering the telephone
 - a. The telephone will be answered within the first two rings.
 - b. The telephone will be answered with this greeting: **"Code 3, do you have an emergency."**
 - c. The telephone operator will speak with a clear, concise manner at a volume level that can be easily understood.
 - d. The telephone operator will be prepared to take notes and messages.
 - e. The conversation of all callers, including personnel will be recorded in a communications log.
 - f. The conversation will be ended with **"Thank You for Calling"** or **"Have a Safe Morning/Day/Evening"**

NOTE: If one telephone line is active and another telephone line begins to ring, the telephone operator will advise the first caller to hold for a brief moment, while the additional line is answered. This request will be made as follows: **"I am sorry, can you please hold for one moment while I answer our other emergency line."** If both calls are emergencies, the telephone operator must react quickly and obtain as much information as possible from both callers before disconnecting the call with either party. Call back telephone numbers for each party will be obtained.

- 3) **Emergency Communications:** An emergency call is the lifeblood of Code 3, Inc. Emergency calls are what Code 3 was founded on and the calls must be managed in a professional, efficient and strategic manner. Once the caller has advised that they do have an emergency, the following information must be obtained:
- a. May I have your name (obtain correct spelling, if it is in question)?
 - b. May I have the name of your company or affiliation?
 - c. What is the call back telephone number?
 - d. May I have the exact City and State of the incident? (obtain the exact location, in order to determine the response manager)
 - e. What is the exact address of the incident?
 - f. Is this a transportation, fixed facility or other type of incident?
 - g. Do you know the chemical or chemicals involved at this time? Obtain the correct spelling of the chemical.
 - h. Advise the caller that you have the initial information sufficient to initiate a response.
 - i. Advise the caller the name of the response manager (see attached response map) and ask them if they would like to be connected directly to the manager or have the manager paged and wait for a call back.
- 4) **Non-Emergency Communication:** A non-emergency call is no less important than an emergency call. Once the caller has advised that this is not an emergency, Code 3, Inc. will respond with:
- a. How may I help you?
 - b. If the caller is requesting a company employee, obtain the callers name, company or affiliation and a call back telephone number. Additionally, obtain the nature of the call (business, project up date, personal, etc.).
 - c. If the caller is requesting information pertaining to services offered by the Company, obtain the same above information and direct the call to Mr. Rick Roark, Lee Thompson or Tim O'Brien.
 - d. If the caller is requesting any other information, do your best to assist them. If you cannot satisfy the caller, contact Lee Thompson immediately.
- All calls or other communications (such as faxes or package deliveries) will be logged.
- 5) **Incident Notification:** After a call for emergency services has been received the following procedures must be implemented.
- a. Notify the appropriate response manager via pager, home or cellular telephone. The manager may provide you with specific notification, such as a telephone number where they are located or hotel, etc. If this is the case, please implement notification as instructed immediately. (The manager should have been identified in step D of emergency communications). For example, if the incident is in Houston, Texas the response manager would Steve Alvarado. If the spill occurs in a location within the State of Texas in which Code 3 does not have a response office, identify the closest

Code 3 response office, within response zones of attached map. If the incident is located in another state or country notify the principal on call (Lee Thompson/Tim O'Brien).

From time to time a caller may have an emergency, but request a specific individual employee, proceed with the notification as requested, but additionally notify the response manager in the specific territory of the situation. If the manager has not responded to you within five minutes of initial notification, begin contacting Lee Thompson or Tim O'Brien, whichever is on call.

- b. When the response manager calls in, provide them with all the information you obtained from the caller.
 - c. Ascertain if the manager would like you to make any other notifications at this time. If the response is yes, identify the location in which the manager is directing his personnel.
 - d. Once all personnel have been notified, advise the response manager via pager. If there are any problems with response personnel, contact the manager immediately.
 - e. After all contact has been made for initial response personnel, send out a group page to the main group (identified in paging software), then to each individual office personnel, office by office. Pager messages should be worded as such:

C3 – (office location) responding to (name of chemical) spill involving a (insert mode, i.e., tank truck, rail car, barge, pipeline or fixed facility) in (city and state). (insert managers name) handling response.
 - f. Continue providing all requested support for the manager as directed.
- 6) **Project Number Issuance:** Once the response manager has advised you that he is responding to the incident, obtain a project number from the project log. The log requires specific information be collected. Utilize the information obtained from the caller to complete the form. Once the form is completed, page the response manager with the Project Number.
- 7) **Purchase Order:** When a manager or other response personnel request a purchase order, you must complete the entire form, which includes:
- a. Name of vendor;
 - b. Address of vendor;
 - c. Description of equipment, services, etc. being purchased;
 - d. Unit price for equipment, services, etc. being purchased;
 - e. Total cost of purchase, if available at the time of issuance; and
 - f. Name of individual requesting the purchase order.

Be sure that you have completed all required information. Questions regarding purchase orders should be directed to Christina Deytz.

General Incident Procedures and Site Safety

- 1) **Hazard Assessment:** Early recognition of incident hazards and potential risk is essential. The initial responsibility for assessment of incident hazards lies with Code 3, Inc. On-Scene Commander.

The Code 3, Inc. On-Scene Commander will gather all pertinent response information regarding the presence or release of hazardous materials or chemicals, when receiving the initial call and while enroute to the incident. The On-Scene Commander must stay in constant contact with the requesting party to receive response updates, direct activities until on-scene, and to provide status reports as to the ETA of response equipment.

Response Information: Since accurate information about the incident or site might not be available when responding, special attention should be focused on the possibility of exposure in the following circumstances:

- Transportation accidents.
- Industrial accidents.
- Leaks, spills, or suspicious odors.
- Medical emergencies involving chemical inhalation.
- Explosion.
- Structural collapses.

On-Site Information: On-site information gathering must be limited to that which can be obtained within the limits of each responder's level of training and protective equipment. It is not in the best interest of the public or the responders to become a part of the emergency problem instead of the solution. The On-Scene Commander will obtain specific information as to the responsible party:

- Name of authorized representative on-site.
- Billing address for responsible party.
- Telephone numbers for the responsible party.
- Purchase Order for emergency response activities.
- Identification numbers or marking of the container(s) involved in the release of hazardous materials.
- Have responsible party sign a contract of services.

If a responsible party representative is not on-site, attempt to contact CHEMTREC and have them contact a company representative. Advise CHEMTREC to have the representative call you back. Once the representative has returned your call, brief the representative on the current status of the spill. Obtain authority to provide response services. If dispatch personnel are available have the dispatcher (Code 3, Inc.) fax a contract of service to the representative.

If a responsible party representative is on-scene, Code 3 will brief them on our contract and identify the scope of work they wish Code 3, Inc. to perform. Once the scope of

work is agreed upon, have the representative sign a response contract prior to beginning response activities.

Environmental Evaluation: The following are environments that must be evaluated before any commitment of personnel for any reason:

- Large containers or tanks that must be entered.
- Confined spaces (manholes, trenches, etc.) that must be entered.
- Potentially explosive or flammable situations indicated by gas generation.
- Presence of extremely hazardous materials such as cyanide, phosgene, or radioactive materials.
- Visible vapor clouds.
- Areas where biological indicators such as "Unconscious persons", dead animals or vegetation are located.

- 2) **Site Security and Control:** An incident generally involves the escape of normally controlled substances and response activities involve actions to minimize and prevent these discharges. Site Control is preventing or reducing the exposure of any person and the transfer of hazardous substances (contaminants) from site by civilians, department members and equipment. Site control involves two major activities: 1) Physical arrangements and control of the site work areas and 2) The removal of contaminants from people and equipment.

Control is needed to reduce the possibility of transport from the site of contaminants, which may be present on personnel and equipment. This can be accomplished in a number of ways including:

- Establishing physical barriers to exclude the public and unnecessary personnel.
- Establishing checkpoints with limited access to and from the site, or areas within the site.
- Minimizing personnel and equipment on-site consistent with effective operations.
- Establishing containment zones.
- Undertaking decontamination procedures.
- Conducting operations in a manner to reduce possibility of contamination.

- 3) **Decontamination:** Decontamination (Decon) is the process of making personnel, equipment and supplies safe by reducing present levels of poisonous or otherwise harmful substances. This process is one of the most important steps in ensuring personal safety at a hazardous materials emergency. The extent of its success depends on the ability of the On-Scene Commander to maintain control of personnel at the site.

The detail of decontamination operations required at an incident depends on the safety and health hazards of the contaminants. An uncontaminated light oil, for example, that presents a minimal hazard can be partially decontaminated by flushing it from protective clothing. In contrast, a poisonous material will require a careful, detailed plan.

- 4) **Emergency Medical Treatment:** Teams from the Emergency Medical Service (EMS) are available to assist in medical treatment, and monitor the response personnel and others exposed to hazardous materials. The On-Scene Commander should identify the telephone number of the local EMS provider and advise them of the response and the substance involved. If the On-Scene Commander deems it necessary to have an EMS unit stand-by at the site, make the request through the local EMS central dispatch.

5) **Personal Protective Equipment (PPE)**

Structural Firefighting Gear: Structural firefighting gear is designed to protect firefighters from heat and flame.

Hazardous materials can contaminate protective clothing, respiratory equipment, tools, vehicles, and other equipment used at an emergency scene. Full firefighting gear and SCBA will be used at all times as a minimum of protection against exposure. Safe work practice WILL MINIMIZE exposure and contamination.

Use of Chemical Protective Clothing: The use of chemical protective clothing and equipment requires specific skill acquired through training. It is only available to members of Code 3, Inc.

This type of special clothing may only protect against one chemical, yet be readily penetrated by other chemicals for which it was not designed. It offers little or no thermal protection in case of fire. No one suit offers protection from all hazardous materials.

When responding to non-hazardous substance Tyvek, gloves, rubber boots and a hard hat will be the minimum PPE worn by personnel. For hydrocarbon products personnel will wear the protection identified above with the exception of Saranex instead of Tyvek and an optional full-face respirator if vapors are present.

Special Protection: The level of special protection required in each zone at an incident will be determined by the On-Scene Commander or Safety Officer based on information available.

Levels of Protection

The levels of protection available include:

Level A - Highest level of protection to the responder.

Level B - High level of protection to the respiratory tract but lower level of skin protection than level A. Level A and B protective equipment is only available for use by members of Code 3, Inc. Emergency Strike Team.

Level C - Does not require maximum skin or respiratory protection. This level presupposes that the types of air contaminants have been identified, concentrations measured, and the atmosphere is not oxygen deficient.

Level D - Provides minimal protection and is used to guard against nuisance contamination only.

Note: Structural firefighter protective clothing, i.e. turnout or bunker gear, is not classified as chemical protective clothing.

- 6) **Rescue:** In most situations, emergency personnel can protect the public by isolating and denying entry to contaminated areas. Initial rescue actions should concentrate on

removing able-bodied persons from immediate danger. Involvement in complicated rescue problems or situations should be evaluated before being attempted.

When the probability is high that the victim cannot be saved or is already dead, rescue should not be attempted if it will place the rescuer at unnecessary risk. The danger of exposure to unknown chemicals or a potential explosion may make the risk unacceptable.

The following should be considered in attempting a rescue during a hazardous materials emergency:

- Has the presence of a victim been confirmed visually or by other credible sources?
- Is the person conscious or responsive?
- How long has the victim been trapped or exposed? Is he/she viable?
- Is the leaking material pooling or vaporizing in the area of the victim?
- What are the properties of the material involved? What is the concentration of the material around the victim?
- What special equipment is available to assist in this effort?

Consideration of these questions will help in weighing the likelihood of a successful rescue against the overall risk to the rescuer.

7) **Evacuation/Sheltering:** There are essentially two ways to protect the public from the effects of hazardous material discharges into the environment.

- Evacuation: involves moving threatened persons to shelter in another area.
- Sheltering in place: involves giving instruction to people to remain where they are until the danger passes.

Evacuation is clearly safer with respect to the hazards, but has certain limitations and may pose new problem. Evacuation takes time and may not be possible if large numbers of persons or a large volume of vapor is present. Evacuation through a toxic atmosphere may actually cause more harm than good in some cases.

Evacuation is best considered when:

- There is an immediate danger of fire or explosion.
- The potential for discharge is great, it has not taken place, and there is time available to relocate people.
- The discharge has taken place but people are sufficiently protected to permit time for evacuation.
- People not yet in the path of a release will be threatened by changing conditions.

Large Scale Evacuation: Large-scale evacuation will be directed by the IC, the Code 3, Inc. On-Scene Commander and will require the coordinated efforts of several agencies.

Sheltering in Place: The decision to shelter in place is appropriate when the hazardous material will not affect the structure of its occupants or the hazard will pass a structure with little infiltration.

Sheltering in Place Alternatives

Sheltering in place is the alternative when:

- Pre-planning has identified options for problem areas such as hospitals, jails, nursing homes, public assemblies, etc.
- Evacuation cannot be properly managed with the manpower, resources, and facilities presently available.
- The hazardous material displays the following characteristics: low to moderate toxicity; totally released and dissipating; small quantity solid or liquid leak; a migrating vapor of low toxicity and quantity and people are safer indoors than outside; and release can be rapidly controlled at the source.

Success: The success of either option will depend on the preplans of effectiveness of communication resources, notification and public information.

Roles and Responsibilities of Code 3, Inc. Responders

The initial call for an emergency response by the client to Code 3's nationwide, 24-hour, 800 line will be picked up by a Code 3 telephone operator. Code 3 does not use an answering service. Code 3's employee will answer the phone 24 hours per day. The operator will document all pertinent information and notify all senior personnel via alpha pager. The nature and location of the incident will be transmitted to all personnel and the respective supervisors will remain on standby until notified by the district manager. After the information has been relayed to the district manager, a page will be sent to all senior personnel clearing the emergency response. This redundant, broad notification system ensures that no response will be delayed while initial contact with the client is taking place. If more information is necessary, the district manager will request the required information from the client representative initiating the response.

The district manager will be advised of each emergency response operation and be kept abreast of changing circumstances as they pertain to additional personnel, equipment or professional staff requirements. As an operation warrants, the district manager or his appointed onsite representative will report to the incident to insure that proper cleanup procedures are followed. The district manager will be held accountable for the entire project. From initial response through billing and report preparation, the district manager will audit all projects under the term of the contract and add or delete personnel necessary to support the contract.

If an emergency response requires the activation of any professional staff, and the specific professional required is not available because of a previous non-emergency assignment, that non-emergency assignment will be placed on hold to accommodate the emergency. The project foreman or supervisor will make the final determination with authority from the district manager.

The project foreman or supervisor is the first person in the actual field operations chain-of-command. The district manager will mobilize the project foreman or supervisor. Depending on the magnitude of the incident, he may request a health and safety officer who will provide health and safety information and specific site safety procedures. The health and safety officer will report directly to the district manager and have the authority to add or change operational procedures. During small emergency response operations, the project foreman or supervisor will

act as site safety officer. If during the course of the cleanup the project magnitude increases, an actual health and safety officer will be assigned.

Code 3's emergency response division has developed and implemented a plan to handle any anticipated emergencies prior to the commencement of control and containment work at a hazardous material release. The format used in this process follows the requirements of 29 CFR 1910.120 Section q (2) "Elements of an Emergency Response Plan". The project foreman or supervisor becomes the incident commander and is responsible to carry out all requirements of the emergency plan. When the response situation is reduced to a hazardous waste operation, the requirements of 29 CFR 1910.120 Section e site-specific health and safety plan "are used."

The project foreman or supervisor will maintain all time logs, equipment usage forms, conduct relations with subcontractors, and provide for the general welfare of the on-site staff. A real time log will be maintained to accurately account for problems encountered and times when equipment, personnel and regulators arrive and depart. The foreman or supervisor will be the point of contact for all client field representatives for answers to questions or requests for additional work to be done. The foreman or supervisor will have the authority to activate any requested equipment or personnel and bind the company at the request of the client representative. Based on the magnitude of the incident, photographs will be taken at the beginning, during and at the completion of the project.

The project foreman or supervisor will direct the on-site operations, but during the absence of the project foreman or supervisor for meetings or interviews, a working team leader will direct the project cleanup. This person will have a minimum of three (3) years of emergency response field experience and will have demonstrated management skills in line with Code 3's practices. The incident command system that Code 3 follows allows for the transfer of command but this will be done only as required to complete the project.

If the magnitude of the project grows to the point where the project foreman or supervisor cannot adequately maintain proper documentation, a technician will be assigned to relieve the paperwork burden.

The final components of the organization are the field technicians who perform the bulk of onsite cleanup activities. These technicians have a minimum of six (6) months to two (2) years of emergency response experience. All response personnel are trained under the 40 hour 29 CFR 1910.120 hazardous waste site operations program. Code 3 also requires this training as a minimum requirement for all subcontract personnel working in contaminated areas.

Code 3's emergency division has staff strength of 60 full-time employees and 90 part-time employees. The response personnel are grouped into response districts in order to limit the time frame from initial call to actual departure from the designated response facility. All employees and subcontractors carry a digital or alphanumeric pager with statewide capability for notification of an emergency. The district manager will maintain a full directory of all subcontract personnel including pager numbers, home numbers and mobile phone numbers for all key personnel.

Major Incident Management System

The intent of Code 3's Major Incident Management System is to provide a comprehensive management structure that satisfies the requirements set forth in OSHA CFR 1910.120. "The

ICS shall be established by those employers for the incidents that will be under their control and shall be interfaced with the other organizations or agencies who may respond to such an incident.”

Command Staff

- 1) **Incident Commander:** The one function that will always be filled at every incident, regardless of size, is the Incident Commander. The IC has the responsibility of overall incident management.

Responsibilities:

- Assess the incident priorities. The IC must consider safety issues for all personnel at an incident. No industrial complex or form of property is worth the risk of even one life. Safety comes before all other considerations. The IC is responsible for determining the strategy that will minimize the impact that an incident may have on the surrounding area. The size and complexity of the command system developed and implemented by the IC should be directly proportional to the magnitude and complexity of the incident. The IC structure must match the complexity of the incident, not the size. Situations that may appear hopeless must be managed and ultimately controlled.
- Determine the incident’s strategic goals and tactical objectives. The efforts of the resources available for handling any incident must be properly directed to minimize the damage. The clocks cannot be turned back. Damage that has already occurred cannot be alleviated, but further damage must be minimized.
- Develop or approve and implement the incident action plan. The IC is the primary developer of the incident action plan. On most simple incidents, the action plan will be organized completely by the IC and may not need to be written down. In more complex incidents, the action plan will be a written document developed by a staff, headed by the IC. Action plans must be flexible and continually assessed.
- Develop an incident command structure appropriate for the incident.
- Assess resource needs and deploy as needed. The IC must continually evaluate and adjust the deployment of resources at all incidents. Initial assessment of the incident and the needed resources is only the first step. As soon as the IC determines the incident’s strategic goals and tactical objectives and then evaluates the resource needs to meet these goals and objectives, one of two actions will occur. Either the initial action plan will be successful or it will need to be revised. Additional resources may be needed, requiring reorganization. If the IC believes he or she has just enough resources for the required work, it is time to order additional help and / or other resources. Per CFR 1910.120 Q (vii), the individual in charge of the ICS shall designate a safety official that is knowledgeable in the operations for the incident at hand. When activities are judged by the safety official to be an IDLH condition and / or to involve an imminent danger condition, the safety official shall have the authority to alter, suspend, or terminate those activities. The safety official shall immediately inform the individual in charge of the ICS of any actions needed to be taken to correct these hazards at an incident site.

- Coordinate overall site activities. Coordination is essential to effective incident management. Without it, resources will be wasted performing tasks that are not necessary to the overall success of the incident. The IC must constantly monitor the incident activities to ensure that the needed degree of coordination is present and that personnel are not working at cross duplication. The goal of the IC is to obtain the maximum productivity from all on-scene resources. Proper coordination will ensure that personnel and equipment are functioning within the action plan.

- 2) **Liaison Responsibilities:** The Liaison individual(s) are the point of contact for assisting or coordinating regulatory agencies. This is essential to avoid the duplication of efforts. Liaison management provides lines of authority, responsibility, and communication. The liaison responsibilities also include media management when required.
- 3) **Operations Responsibilities:** Operations is responsible for management of all tactical operations at the incident. Operations is implemented when the IC is faced with a complex incident having major demands in one or more of the remaining major functional areas. For example, the IC may be faced with a rapidly escalating incident with a significant need to evaluate strategy and to develop alternative tactical options. Faced with a major functional responsibility in addition to management of tactical operations, the IC may need to staff Operations to maintain an effective span of control.

The most common reason for staffing Operations is to relieve span-of-control problems for the IC. A complex incident, in which the IC needs assistance determining strategic goals and tactical objectives, may also require implementing Operations.

- 4) **Planning Responsibilities:** Planning is responsible for the collection, evaluation, dissemination, and use of information about the development of the incident and the status of resources. When faced with a complex or rapidly escalating incident, the IC may require assistance with the ICS Planning function. A wide range of factors may impact incident operations. Planning must include an assessment of the present and projected situation. Proactive incident management is highly dependent on an accurate assessment of the incident's potential and prediction of likely outcomes. In addition to assessment of the situation status, there is a critical need to maintain information about resources committed to the incident and projected resource requirements.
- 5) **Logistics Responsibilities:** Logistics is responsible for providing facilities, services, and materials for the incident. As incidents grow in size, complexity, and duration, the logistical needs of the operating forces also increase. Even in a relatively simple incident, there are requirements for equipment, drinking water, and emergency medical care. When faced with a major incident, the logistical requirements are significant. Long duration incidents of any type require provisions for feeding personnel, toilet facilities, refueling of vehicles / equipment, lodging, and a myriad of other service and support resources. Acquisition and the accurate distribution of material / equipment is a major functional responsibility for this position. This individual(s) works very closely with planning personnel.
- 6) **Finance Responsibilities:** Finance is responsible for tracking all incident costs and evaluating the financial considerations of the incident. It is the responsibility of Finance personnel to insure that all disbursements are documented including but not limited to accurate invoicing for all services and materials used.

Personnel Requirements for Implementation of the Incident Command System

- 1) **Incident Commander:** The Incident Commander shall have a complete understanding of the Incident Command System and be experienced in managing complex incidents.
- 2) **Safety Officer:** The Safety Officer shall have a complete understanding of Code 3's Standard Operating Procedures (SOP's) and be very knowledgeable in the operations being implemented.
- 3) **Liaison Officer:** The Liaison Officer shall be experienced in interfacing with regulatory officials and coordinating the efforts of several agencies during a single incident. A service / people oriented individual is paramount in fulfilling this role.
- 4) **Operations Officer:** The Operations Officer shall have a complete knowledge of the ICS system and be experienced in all phases of the operations being implemented. This individual should have proven management skills and supervisory experience.
- 5) **Planning Officer:** The Planning Officer shall have proven management skills and be capable of coordinating long-range tools and manpower needs. The Planning Officer shall be responsible for coordinating the quantity of company and subcontracted personnel needed during the incident. Logistical experience is desirable.
- 6) **Logistics Officer:** The Logistics Officers shall have resource management skills and prearranged resources available to supplement an incident of any size, twenty-four (24) hours a day.
- 7) **Finance Officer:** The Finance Officer shall have proven financial management skills utilized during a major incident. This individual shall be competent in gathering all cost data and the preparation of invoices / estimates from the field. Additional responsibilities would include but not be limited to, establishing credit accounts for localized vendors and sub-contractors.
- 8) **Foreman or Supervisor:** The project Foreman or Supervisor shall be experienced and competent in performing their assigned tasks. The Foremen shall work under their respective Sector Commander / Supervisor, and relay all communication needs through them. The project foreman or supervisor shall be assigned appropriate work crews and work directly with them insuring the assigned tasks are completed fully.

Emergency Strike Team

The duties of Code 3, Inc.'s emergency strike team requires more directed or specific knowledge of the various substances that the team may be called upon to contain. Team training includes knowledge of procedures for the use of specialized chemical protective clothing, survey equipment, and special procedures for containing a chemical hazard and decontamination.

The purpose of the team concept is to provide for the safety and accountability of all the members. No person involved in the mitigation activities of this team will work alone. The team will incorporate the following:

- 1) **Analysis:** Verify, identify, or classify hazardous materials and determine their concentration; collect and interpret hazard and response information; estimate damage to containment system.

- 2) **Planning:** Select appropriate PPE for incident activities; develop decontamination procedures; develop plan of action consistent with ERP and within the capability of personnel, PPE, and equipment available.
 - 3) **Operations:** Carry out planned activities under the direction of the On-Scene Commander as per the ERP.
 - 4) **Strike Team Supervisor:** On duty team supervisor will supervise the "hands-on" mitigation operation. He/she will coordinate the following activities as directed by a report to the On-Scene Commander or level of supervision assigned by the On-Scene Commander.
 - Obtain briefing for the On-Scene Commander immediately upon arrival at the incident.
 - Confirms the development of Control Zones and Access Control Points and the placement of appropriate control lines.
 - Ensures that a Site Safety Plan is developed and implemented.
 - Participates in the development of the Incident Action Plan; develops the Hazardous Materials portion of the Incident Plan.
 - Evaluates and recommends evacuation, sheltering, and decontamination options to the On-Scene Commander.
 - Conducts safety meeting with the Strike team members. The supervisor is responsible for site safety and operations inside the area bound by the Contamination Control Line including the Exclusion Area or "Hot Zone."
 - Ensures that the proper Personal Protective Equipment is selected and used.
 - Ensures that current weather data and future weather predictions are obtained.
 - Supervises the activities of and maintains communications with: strike team members or on-Scene Commander or operations manager depending on level of response.
 - Establishes environmental monitoring of the hazard site for contaminants.
 - Ensures that appropriate agencies are put in contact with the On-Scene Commander.
 - Terminates operations.
 - Supervises the decontamination of equipment and personnel.
 - Insure that the response unit is restocked and ready for service prior to releasing Strike Team Personnel.
- Entry Team:** The entry team consists of a minimum of two members assigned to Code 3, Inc.'s emergency strike team. One member will be designated the team leader. The team leader will, on orders from the supervisor, perform the following functions:
- Obtain briefing from the supervisor.
 - Supervise entry operations.
 - Recommend actions to mitigate the situation within the Hot Zone.

- Perform actions, as directed by the supervisor, to mitigate the hazardous materials release or threatened release.
- Maintain communications and coordinate operations with: strike team supervisor; decontamination team leader; resource technician/hazardous materials reference; backup team.
- Maintain control of the movement of people and equipment within the Hot Zone, including contaminated victims.
- Direct rescue operations, as needed, in the Hot Zone.
- Terminate operations.

Backup Team: The backup team consists of a minimum two members assigned to Code 3, Inc.'s emergency strike team. One member will be designated the team leader. The team leader will, on orders from the supervisor, perform the following functions:

- Obtain briefing from the supervisor.
- Assist Entry Team in site survey and product identification.
- Carry out actions as directed by the supervisor.
- Ensure all equipment is prepared for use according to action plan.
- Maintain sight contact with Entry Team whenever possible.
- In proper PPE, act as a backup Entry Team safe area. Be prepared to rescue entry team.
- Complete operations in Hot Zone should Entry Team fail to complete assignment.
- Maintain Communications and coordinate operations with: entry team leader; strike team supervisor; resource technician/hazardous materials reference; decon team leader.
- Furnish additional equipment or supplies to the Entry Team as needed. Replace used equipment.
- Terminate operations.

Decontamination Team: The decontamination team consists of a minimum two members assigned to Code 3, Inc.'s emergency strike team. One member will be designated the team leader. The team leader will, on orders from the supervisor, perform the following functions:

- Obtain briefing from the supervisor.
- Manage the Control Zones and Access Control Points and the placement of appropriate control lines.
- Ensure appropriate action is taken to prevent spread of contaminants.
- Set up decontamination area. Implement decontamination process of Haz-Mat Team.
- Decontaminate, as much as possible, all equipment used.

- Maintain communications and coordinate operations with: entry team leader; hazardous materials group supervisor; resource technician/hazardous materials reference; and backup team.
- Overpack exposed equipment for further decontamination or disposal.
- Ensure that all equipment is placed back in service.
- Terminate operations.

Resource Technician: A member of the Haz-Mat Team designated to provide technical information and assistance to the Hazardous Materials Group using various reference sources such as computer data bases, technical library, CHEMTREC, and phone contact with facility representatives.

The Resource Technician may provide product identification using tests kits and/or any other means of identifying unknown materials.

The Resource Technician will, on orders from the Strike Team Supervisor, perform the following functions:

- Obtain briefing from the Strike Team Supervisor.
- Provide support to the Strike Team Supervisor.
- Monitors SCBA use time for suit operations.
- Determines personal protective equipment compatibility to hazardous material.
- Maintain communications and coordinate operations with Entry Team Leader; Strike Team Supervisor; Backup Team Leader; Decontamination Team Leader.
- Provide technical information management with public and private agencies. Interpret environmental monitoring information.
- Provide analysis of hazardous material samples.
- Document operations and notifications; e.g., document serial numbers of chemical protective suit worn by members.
- Provide technical information of the incident for documentation.
- Determine proper decontamination requirements.
- Complete all necessary reports and forms and terminate operations.

Safe Work Practices

- 1) **General Procedures:** The following work practices must be enforced to ensure a safe work site for all personnel.
 - Always consider the possibility that hazardous materials may possess multiple hazards.
 - Use full structural firefighting clothing and SCBA as minimum protection from unnecessary exposure to contaminants.

- Each member should be alert of the signs, evidence and indications of the presence of hazardous substances during fire and emergencies and report such information to the next higher level of command.
- If and when necessary, members may be divided into teams, each team should be equipped with at least one radio. The Officer of the unit will designate team members and radio contact person.
- Mark all work zones and access points with barricade tape, flagging, or traffic cones.
- Access to the site should remain free unnecessary equipment and apparatus to facilitate other types of emergency access to and egress from the site.
- Persons entering or leaving a work zone must check in/out at the access control point.
- Access and means of egress must be secured and protected for the safety of persons in work zones. Doors, stairways and ladders should be secured. Ramps, ditches and excavations should be made as secure as possible in the event that rapid escape is required from the site.
- No eating, drinking, or smoking is allowed in any contaminated area.
- Implement decontamination based on any analysis of the hazards and risks involved.

2) **Work Zones:** The method of reducing the potential for transfer of contamination is to delineate work areas within the incident site based upon expected or known levels of contamination. Within the areas assigned, personnel will utilize appropriate personal protective equipment. Movement between areas is controlled at checkpoints. Three contiguous areas will be established.

HOT ZONE Exclusion area (contaminated)

WARM ZONE Contamination reduction area

COLD ZONE Support area (non-contaminated)

Hot Zone: The Exclusion Area is the innermost area and is considered contaminated or "hot." Within the Exclusion Area, all entering personnel must wear prescribed levels of protection. A checkpoint must be established at the periphery of the Exclusion Area to control the flow of personnel and equipment between contiguous areas and to insure that the procedures established to enter and exit the areas are followed.

The Exclusion Area boundary would be established initially based on the type of released/spilled materials, initial instrument readings, and a safe distance from any potential exposure.

Subsequently, the boundary may be readjusted based on additional observation and/or measurements. The area should be physically secured by barrier tape into well-defined boundaries.

In the event that the public or any emergency responder has been exposed prior to recognition of a hazardous substance, those persons exposed should be isolated to avoid spreading any contamination and so that proper medical treatment and monitoring can be arranged.

Those not exposed must be kept out of the contaminated area. Unless otherwise demonstrated, everything leaving the Exclusion Area should be considered contaminated and appropriate methods established for decontamination should be implemented.

Warm Zone: Between the Exclusion Area and the Support Area is the Contamination Reduction Area. The purpose of this zone is to provide an area to prevent or reduce the transfer of contaminants that may have been picked up by personnel or equipment returning from the Exclusion Area. All decontamination activities occur in this area.

The boundary between the Support Area and the Contamination Reduction Area is the "Contamination Control Line." This boundary separates the possibly contaminated area from the clean zone. Entry into the Contamination Reduction Area from the clean area will be through an access control point. Personnel entering at this location will be wearing the prescribed level of protection for working in the Contamination Reduction Area. Exiting the Contamination Reduction Area to the clean area requires the removal of any suspected or known contaminated protective clothing and/or equipment and the appropriate decontamination procedures be followed.

At the boundary between the Contamination Reduction Area and the Exclusion Area is the "Hot Line" and access control station. Entrance into the Exclusion Area requires the wearing of the prescribed chemical protective clothing that may be different than the equipment requirements for working in the Contamination Reduction Area.

At a point close to the "Hot Line," a personnel and/or equipment decontamination station is established for those exiting the Exclusion Area. Unless otherwise demonstrated, everything leaving the Exclusion Area should be considered contaminated and appropriate methods established for decontamination should be implemented.

Cold Zone: The Support Area is the outermost area of the site and is considered a non-contaminated or "clean" area. It is designated as a controlled area for authorized support personnel and the location for support equipment (Command Post, Equipment, etc.) Since normal firefighting clothing is appropriate within this zone, potentially contaminated personnel clothing, equipment, etc. are not permitted.

Area Dimensions: Considerable judgment is needed to assure safe working distances for each area balanced against practical work considerations. During long-term operations zones may be adjusted.

The following criteria are to be considered in determining the area dimensions:

- Physical and topographical barriers;
- Weather conditions;
- Monitoring measurements;
- Explosion/exposure potential;
- Physical, chemical, toxicological, etc., characteristics of the contaminant(s); and
- Cleanup activities.

Other Considerations: The use of a three-zone system of area designation, access control points and decontamination procedures provides a reasonable assurance against

the translocation of contamination substance. This control system is based on a "worst case" situation. Less stringent site control and decontamination procedures than described may be utilized based upon more accurate information on the types of contaminants involved and the contaminating hazards they present. This information can be obtained through air monitoring, instrument survey, etc., and technical data concerning the characteristics and behavior of material present. Site control requirements can be modified within the limits of safety for specific situations once more reliable data has been analyzed.

- 3) **Decontamination Procedures:** As part of the system to reduce the physical transfer of contaminants by people and/or equipment from the site, procedures will be instituted for decontaminating anything leaving the Exclusion Area and Contamination Reduction Area. These procedures include the decontamination of personnel, protective equipment, monitoring equipment, clean-up equipment, etc.

In the event that the public or any emergency responder has been exposed prior to recognition of a hazardous substance, those persons exposed should be isolated to avoid spreading the contamination and so that proper medical treatment and monitoring can be arranged.

Those not exposed must be kept out of the contaminated area.

Code 3, Inc. maintains a Hazardous Materials Decontamination Unit. The Unit consists of the Decon trailer and a support unit.

The following steps have been designed to deal with personnel decontamination in worst case incidents. In some situations it will not be necessary to go through the entire procedure. The decision to implement all or part of the decontamination process should be based on a field analysis of the hazards and risks of the hazardous materials involved.

Code 3, Inc. Hazardous Materials Unit supplies the toxicological and reactivity information that determines which techniques apply to the situation.

Step 1: An "entry point" will be established and marked in order to guide contaminated personnel into the Decon area.

Step 2: Protective clothing will be removed and isolated. Contaminated coats, helmets, etc. should be placed in plastic bags to isolate contaminants. Bagged clothing should be sealed and placed in recovery drums outside the trailer for further analysis and for transportation to another location for laundering or disposal.

Step 3: Members enter the rear of the Decon Unit. EMS personnel will supervise the decontamination procedures. All personal effects and work clothing are removed and placed in bags and drums.

Step 4: In almost all cases, members will shower for a period determined by the type of substance involved. The exceptions that occur are when the substance involved is one made more active by water.

Step 5: After showering, members are issued towels and clothing to enable them to proceed to areas designated by EMS personnel. Members exit Decon Unit.

Step 6: **EMS** personnel examine members, taking a medical history, checking vital signs,

and follow-up on any physical complaints. This will usually take place in the **EMS MERVAN** on the clean side or Support Zone.

Step 7: Any members that require further evaluation or treatment will be transported by **EMS**.

Step 8: The Decon Unit will disconnect and store the unit's equipment and apparatus.

Step 9: Wastewater from the showers will be analyzed by and appropriate disposition of the wastewater addressed

A member of the Special Operations Command will identify apparatus, equipment, and clothing to be decontaminated. All clothing, personal items, apparatus, tools, and equipment will remain at the site pending this determination. This Special Operations Command (SOC) will arrange for the collection, removal, transportation, storage, cleaning, and temporary replacement of exposed or contaminated clothing and equipment. On receipt of members' original clothing, Company Commanders will contact SOC to arrange return of replacement clothing.

Incident Command System Functions and Responsibilities

These activities are specific to hazardous materials incidents and are in addition to the usual requirements of each position. This does not restrict the IC from staffing other ICS positions or from specifying additional duties that might be required by the incident. **ANY FUNCTIONS NOT DELEGATED REMAIN THE RESPONSIBILITY OF THE ON-SCENE COMMANDER.**

- 1) **Safety** - reports directly to the On-Scene Commander. The Safety Operations Officer will respond to all Level 2 or 3 incidents and as requested by the On-Scene Commander. At a hazardous materials incident, they will monitor conditions and activities in the Support Zone (Cold Zone).

The Safety Operations Officer at the scene is also designated to confirm that all exposed members participate in the decontamination procedure conducted by the Decon Team and the Special Operations Decon Officer. If for any reason the Safety Operations Officer does not respond to the scene, the Special Operations Decon Officer will perform this function.

The Safety Officer is responsible for recording the name, rank, Social Security number and unit identification of all members decontaminated with a description of the decontamination procedures employed.

The Safety Officer designated will, as soon as practicable after the incident, forward a report to the Incident Commander.

The Strike Team Supervisor is responsible for site safety and operations inside the area bounded by the Contamination Control Line including the Exclusion Area or "Hot Zone."

- 2) **Information** - reports directly to the On-Scene Commander. Code 3, Inc.'s Public Information Office will be notified upon a Level 2 or 3 incident.

Employees should not make any statements to anyone outside the Companies chain of command about the character or nature of a hazardous materials incident. Inquiries should be directed to the On-Scene Commander or Information Officer, if the position has been staffed.

Incident Termination Procedures

Incident scene activities include removing the hazardous material, all contaminated debris (including dirt, water, containers, vehicles, tools, and equipment) and returning the scene to as near normal as it existed prior to the incident.

Prior to leaving the scene, the On-Scene Commander shall review the particulars of the incident to make a preliminary information is accurately recorded and that the area has been restored to a reasonable state, prior to receiving analytical verification of clean-up.

Specific incident termination instructions will be listed in the incident checklist.

Post Incident Procedures

1) Incident Analysis

- The On-Scene Commander's responsibility following each hazardous materials operation includes a review of actions taken. Corrective actions should be taken at the lowest possible level. Recommendations regarding procedures or the elements of the response plan should be forwarded through the chain of command with endorsements from the Vice President of Operations for Code 3, Inc.
- As standard part of this Emergency Response Plan, Code 3, Inc. will review all hazardous materials incidents in order to: identify and correct any deficiencies in the response plan and identify trends, patterns, and deficiencies in procedures that need to be addressed in revised operations, safety, or training programs.
- Develop a database to establish profiles for decisions regarding tools and equipment, training, budgeting, operations, hazard prevention legislation etc.
- Document efforts of proactive intervention to reduce losses.
- Findings and recommendations, if any, from any individual review will be forwarded through the chain of command to the Vice President of Operations.

2) Critique Outline: When a formal critique is ordered, the On-Scene Commander for a particular incident shall prepare a narrative report addressed to the Vice President of Operations, containing at least the following information. Include copies of the incident log to reduce preparation time.

1. Identifying information including the date, box number, and location.
2. Description of conditions found and actions taken by the first responding units.
3. Description of conditions found and actions taken by the first supervisory personnel to arrive at the scene.
4. Describe hazard identification and site control measures taken and results.
5. Describe the personal protective equipment and special chemical protective equipment used by each group of responders at the incident. Describe decision made (ie: changes in the levels of protection).
6. A time line describing the notification, change of command, and arrival of special units, outside agencies, etc.

7. Describe the ICS organizational structure developed. (Include positions staffed, command post, sectors/groups, control zones, etc.)
 8. A description of the key phases of the incident including sufficient detail to explain changes in incident activities or other significant events during the life of the incident. Include description of alternative plans considered, if any.
 9. Description of decontamination procedures.
 10. Description of problems encountered and lessons learned.
- 3) **Emergency Response Plan Review:** A formal cyclical review process and a method of keeping this document current with existing laws and standards will be developed and implemented at the time this document is finalized and published. The review process will be developed with the intent described in the Incident Analysis portion of this plan.