United States Coast Guard
U.S. Department of Homeland Security

COUVILLION
Couvillion Group, LLC

COUVILLION

Couvillion Group, LLC
MC 20 Product Removal and Transportation Plan

Document #: Couv-O&M-Doc-00004

3/18/19

Revision	Date	By	Check	Approve	Remarks
Rev. 0	3/18/19	Hoffmann	Kennelley	Couvillion	Initial Document
Rev. 1	7/8/19	Hoffmann	Kennelley	Couvillion	Updates to Rev 0

MC 20 Product Removal and Transportation Plan

USCG Contractor: Couvillion Group
Spilled Material: Crude OIL
Spill Volume (estimate): TBD
Spill Location: MC 20
Date: 01 April 2019

SECTION I; BACKGROUND AND SIGN-OFF

This plan covers the disposal of oily waste debris (including debris, sediment, absorbents, oily water and recovered oil) from the MC 20 site. It addresses the process and documentation for disposal of waste debris after the maintenance vessel has collected the hydrocarbon fluids offshore and begins with the off-loading of these materials into storage tanks or lined storage boxes at the Couvillion Shore Base in Venice, LA. Applicable local, state, and federal laws and regulations will be followed when recycling or disposing of the recovered material. Disposed material will be tracked to provide an accurate documentation of waste generated from the site. All materials will be categorized and itemized for safe and efficient collection, staging, storage and recycling or disposal.

This document is part of the overall MC 20 Subsea Storage Offloading Operations and Maintenance Manual (Doc # 801057641). The plan/procedure may be amended as necessary to ensure compliance with all applicable laws and regulations, as new materials or waste streams are encountered, or alternative means of disposal are needed. Amendment may occur only upon mutual agreement of the Disposal Contractor (NRC), USCG Contractor (Couvillion Group) and the United States Coast Guard (USCG)

Submitted By: Jesse Bridges
Printed Name: Jesse Bridges (985) 502-7190
Date: 07/10/2019

Approved Couvillion Group, LLC:
Printed Name: Timmy Couvillion (504) 329-6004
Date: 07/10/2019

Approved by USCG:
Printed Name: Kristi M Luttrell
Date: 07/10/2019

SECTION II: WASTE MANAGER AND WASTE HANDLERS

This section lists the contractors assigned and key roles staffed to support disposal.

Name of Company	Disposal Functions	Company Rep. (Name, Phone #)
Legacy Industries	Waste Broker	Cliff Collins - (225)-329-8112
Legacy Industries	Waste Hauler	Jack Scruggs - (504)-382-9158
Industrial Response Svcs.	Waste Hauler	Jeremiah Johnson - (504) 416-2828
Evergreen Recyclers	Water Treatment Facility	Hugh Nungesser - (504)-554- 9285
River Birch Subtitle D Landfill	Non-Hazardous Disposal Landfill	Loren Monahan - (504)436-1288

- Note that additional waste haulers may be used due to availability of trucks.
- Additional disposal facilities may be required pending analytical results. List above will be updated once waste classification is made and additional facilities are required.

SECTION III: INTERIM STORAGE, SEGREGATION, PROFILING, AND TRACKING

A. INTERIM STORAGE OF SOLID AND LIQUID MATERIAL

Interim storage will be located at: Couvillion Venice Shore Base;
433 McDermott Rd; Venice, LA 70091; (504) 912-4891 (24 HR)

A special purpose maintenance vessel with the appropriate processing equipment will go to the MC 20 site and take onboard hydrocarbons collected subsea from the Rapid Response System on a nominal frequency of once a month (plus or minus one week). This vessel will then return to the Couvillion Shore Base at Venice where the collected hydrocarbons and associated water will be offloaded into four 390 bbl double wall frac tanks.

Attachment A: The collected hydrocarbons and associated water offloaded to each of the four 390 bbls BBL storage tanks will be measured via strap measurement and recorded in Attachment A. During the initial offloading (Pump-Off #1) there will be no residual fluid in the tanks. However, on subsequent offloadings there may be residual fluid in the tanks from prior operations and this value should be recorded in Column A before any offloading operation begins. The volume of fluid in the tank onboard the vessel prior to commencement of offloading activities should be strap measured by qualified Cypress personnel and recorded in Column B. Once the offloading is complete the onshore frac tanks shall be strap measured and values recorded in Column C. Column D will yield the total fluids offloaded from the vessel and Column E will yield the % difference in measurement between the strap measurements taken onboard the vessel and the measurements acquired from the onshore frac tanks that are being loaded with fluid. If there is a discrepancy of more than 3% then an attempt should be made to explain this discrepancy. After completion of this work the appropriate parties will sign-off on Attachment A.

Attachment B: The fluid in the frac tanks will be allowed to settle out water over a period of approximately 7-8 days and decanting of water from the tanks will be conducted on day 3-4 and at the beginning of any day in which fluids are transported to the recycle/disposal site. The quantity of decanted water is to be recorded via strap measurements and recorded in this attachment. The appropriate parties will sign-off on Attachment B and the Couvillion representative will give approval to begin pump-off operations. After completion of this work the appropriate parties will sign-off on attachment form.

Attachment C: The fluid pumped from the frac tanks into tank trucks is recorded via strap measurements in the oily water and net crude oil form. Once the tank trucks reach the disposal site the buyer will record the total volume of fluid transferred into their storage tanks via strap measurement and this value will be reported in the oily water and net crude oil form as will the net oil value calculed after taking into account temperature and specific gravity. The sales form from the buyer will also be attached to this appendix.

Shipment of collected, segregated and custody transferred metered volumes of oil will be shipped to either Acadiana, PSC, Plains Pipeline or other reputable company.

The residual volume of oily water left in each frac tank after loading a truck will be recorded in Attachment C – Residual Frac Tank Bottoms. Any solids or petroleum contaminated solids will be recorded in the third table of Attachment C- Transportation Tracking of Petroleum Contaimnated Contaminated Solids. Each form in attachment C requires the appropriated sign-off signatures upon completion of the work.

Attachment D: Water that has been decanted from the oil will from time to time be transported to a disposal site. Attachment D should be used to document the volumes along with the appropriate sign-off signatures.

During the operations described above, no truck will leave the yard without written approval from Couvillion Group and without the appropriate paperwork completed and a copy provided to the Couvillion On-Site Representative. All Trucks on site and utilized during these operations will be secured at the end of each shift by inspecting all valves, brakes, gauges, etc., and bleeding pressure from the system to prevent inadvertent opening of pneumatic valves.

B. SEGREGATION

Lined storage boxes delivered to the site will remain on site as interim solid waste storage pending analytical results, profile approval, and load scheduling. Boxes will be secured at the end of each working day to ensure roll tarps are in place preventing rainwater collection inside of box. NRC will seek written approval from the USCG Contractor Couvillion Group for disposal and will provide the appropriate paperwork including Attachment C – Transportation Tracking of Petroleum Contaminated Solids.

All petroleum impacted solids (i.e., absorbents, vegetation, soil, debris, etc.) will be comingled into lined storage boxes for disposal at a landfill pending hazardous waste determination and profile approvals acquired by NRC on behalf of USCG Contractor. An up-to-date Waste Management Tracking form and the appropriate permits will be maintained by NRC and copies provided to USCG Contractor.

C. PROFILING

Waste profiles will be generated by NRC upon proper hazardous waste determination based on the analytical results. All profiles are to be signed by NRC personnel via signed Broker Authorization Letter. Copies of profiles will be provided with billing tickets. Materials sent for recycle will not require a waste profile. Under no circumstances will NRC, OMI or USCG Contractor be listed as the Generator.

D. TRACKING

All waste will be tracked by NRC / Legacy Industries with copies of documentation provided to the USCG Contractor. Tracking will include management of waste manifests with indication of box numbers or truck numbers, dates of shipment, manifested volumes, and scale tickets. Waste load outs will be managed by site supervisors overseeing operations.

SECTION IV: WASTE DISPOSITION

Liquids: Decanted water will be left in the Frac tanks and then periodically disposed of at a waste management site and transported via truck. The collected oil will be sent to a recycle facility by NRC.

Solids: The solid waste will be manifested and shipped to River Birch Subtitle D Landfill for Land Disposal. The RP/UC must make the determination based on analysis and generator knowledge that the waste is below all RCRA hazardous waste limits.

Phase #2 Pumping #4

United States Coast Guard

COUVILLION

Attachment A: Dockside Transfer – Transfer of Liquid and Crude Oil in Accordance with Maintenance

Date: 09/14/2019

Time Transfer Ended: 1645

	Column A Residual Tank Volume From Prior Operation (bbl)	Column B On Board the Vessel Tank Strap Measurement Prior to Start of Offloading (bbl)	Column C Onshore Frac Tank Strap Measurement after Offloading (bbl)	Column D Volume of Fluid (Column C-A) (bbl)	Column E % Difference Column (D-B)/D * 100
Tank 1	0	333.7	304.1		
Tank 2	0	235.2	272.8		
Tank 3	0	323.0	303.5		
Total	0	891.9	880.4	880.4	1.3%

Note: If the % Difference is greater than 3% please attempt to explain the difference: _____

Sign-off by:

USCG Rep Signed Name _____ Printed Name DAMIAN BONIFAY Date: 9/14/2019

Couvillion Rep Signed Name _____ Printed Name Eric Trahan Date 9/14/2019

Cypress Rep Signed Name: _____ Printed Name Shane Stires Date: 9/14/2019

NRC Rep Signed Name: _____ Printed Name Jesse Bailey Date: 9/14/2019

Phase #2 Pump Off #4

United States Coast Guard

COUVILLION

Attachment B: Venice Shore Base On-Site Interim Tank Storage Measurements Before Offloading to Tank Trucks (Decanting of Water)

Date: 9-20-19 **Time:** 0800

Time Measurements begin after Vessel Offloading in hours: _____

	Column A Tank Strap from Offloading (Initially use Column C from Attach A and on subsequent decants use Column D from this form) bbl	Column B Today's Interim Tank Strap Measurement bbl	Column C Tank Strap Measurement after Decanting bbl	Column D Oily Water Mixture Volume Column (B-C) bbl
Tank 1	304.1	304.1	288.4	15.7
Tank 2	272.8	272.8	265.1	7.7
Tank 3	303.5	303.5	285.6	17.9
Total	880.4	880.1	839.1	41.3

Sign-off by: USCG Rep (optional) Signed Name. _____ Printed Name DAMIAN BARTLEY Date 9-23-19

Couvillion Rep Signed Name: _____ Printed Name _____ Date 9-23-19

NRC Rep Signed Name: _____ Printed Name Jesse Bedges Date: 9-23-19

Phase 4-2 Pump Oil #4

United States Coast Guard

COUVILLION

Attachment C: WASTE MANAGEMENT TRACKING FORM

Oily Water Transportation and Net Crude Oil

Start Shipments Date: 9 25 - 19

Manifest Number	Transporter	Truck Number	Date	Receiving Facility	Manifested Volume loaded from Venice Frac Tank into Truck (bbl from Strap)	Volume received by Buyer (bbl by Strap)	Net Crude Oil bbls (Acadiana Oil Ticket)
1	L+B	7573 Trailer 3980	9-23	AOC	138 661		
2	L+B	7585 308780	9-23	AOC	144.3		
3	L+B	7561 300783	9-23	AOC	142.6		
				Total Volumes Shipped by Gallons/bbls			

End of Shipments date: 9-23

Sign-off by: USCG Rep (Optional) Signed Name: _____ Printed Name DAMIAN ROMERO Date _____

Couvillion Rep Signed Name _____ Printed Name _____ Hoffman Date _____

NRC Rep Signed Name _____ Printed Name Jesse Bridges Date 9-23-19

8 19

Phase II 2 Pump # 4

United States Coast Guard

COUVILLION

Attachment C: WASTE MANAGEMENT TRACKING FORM
Residual Frac Tank Bottoms

Date: 09/23/2019

Residual Volume left in Tanks

		Strap Measurement after Trucks Loaded in each tank bbls
Truck	~~Tank~~ 1	28.5
Truck	~~Tank~~ 2	91.4
Truck	~~Tank~~ 3	28.5

Sign-off by: USCG Rep (Optional) Signed Name: _____ Printed Name _____ Date 09-23-19

Couvillion Rep Signed Name: _____ Printed Name D. Hoff Date: 9-23-19

NRC Rep Signed Name _____ Printed Name Jesse Badger Date 9-23-19

Phase 1E Pump 1P #4

United States Coast Guard

COUVILLION

Attachment C: WASTE MANAGEMENT TRACKING FORM

Oily Water Transportation and Net Crude Oil

Start Shipments Date 9-24-19

Manifest Number	Transporter	Truck Number	Date	Receiving Facility	Manifested Volume loaded from Venice Frac Tank into Truck (bbl from Strap)	Volume received by Buyer (bbl by Strap)	Net Crude Oil bbls (Acadiana Oil Ticket)
1	L+B	7573 3980	9/24	AOC	144.4		
2	L+B	7595 [illegible]	9/24	AOC	143.7		
3	L+B	7561 300483	9/24	AOC	55.3		

oil Volume Shipped by Couvillion Inc

End of Shipments date 9-24-19

Sign-off by: USCG Rep (Optional) Signed Name [signature] Printed Name ANDREW SHAW Date 24SEP19

Couvillion Rep Signed Name [signature] Printed Name D. Hoffmann Date 9-24-19

NRC Rep Signed Name [signature] Printed Name Jess (Badge) Date 9 24-19

Doc # Couv O&M Doc 00004

Phase 2 Pumpoff #4

United States Coast Guard

COUVILLION

Attachment C: WASTE MANAGEMENT TRACKING FORM
Residual Frac Tank Bottoms

Date: 9-24-19

Residual Volume left in Tanks

	Strap Measurement after Trucks Loaded in each tank bbls
Tank 1	21.7 bbl
Tank 2	16.2 bbl
Tank 3	16.3 bbl

Sign-off by: USCG Rep (Optional) Signed Name _____ Printed Name KENNETH SHAW Date 24SEP19

Couvillion Rep Signed Name: _____ Printed Name D. Ware Farmer Date 9-24-19

NRC Rep Signed Name: _____ Printed Name Jesse Bayles Date 9-24-19