



Florida Department of Environmental Protection

Bob Martinez Center
2600 Blairstone Road
Tallahassee, Florida 32399-2400

Charlie Crist
Governor

Jeff Kottkamp
Lt. Governor

Michael W. Sole
Secretary

03/05/2009

Rondal Chambers
Environmental Enterprise Of Florida Inc
314 W Landstreet Rd
Orlando, FL 32824-7858

The Florida Department of Environmental Protection has reviewed your application for registration as a transporter or handler for universal waste lamps and devices destined for recycling. Based on the information received, the facility located at **314 W Landstreet Rd # B, Orlando, FL 32824-7803** has been registered through **March 1, 2010** with the following status:

Facility ID # **FLR000006353**
Transporter of Universal Waste Lamps and Devices
Small Quantity Handler Facility for Universal Waste Lamps and Devices
(Less than 2,000kg of Lamps (8,000) and/or 100kg of Devices for 1 Year)

The registration form for the year **2010** will be sent to the contact person on your application.

Chapter 62-737, Florida Administrative Code (F.A.C.), (copy enclosed) specifies several other requirements including packaging, training and record keeping for transporters and handlers of and reverse distribution programs for universal waste lamps or devices destined for recycling. These requirements are simple, flexible and make good business and environmental sense (summarized on enclosed fact sheets).

This registration does not allow you to transport or handle universal waste lamps or devices which are destined for landfill or other disposal. The transportation or handling of universal waste lamps or devices destined for disposal is subject to our hazardous waste management regulations under Chapter 62-730, F.A.C.

If any of your facility's information on the Universal Waste Lamp and Device Transporter and Handler Registration Form changes, please notify me at Mail Stop 4555 at the address above. I can also be contacted at (850) 245-8759 or at Laurie.Tenace@dep.state.fl.us.

Sincerely,

Laurie Tenace
Environmental Specialist
Hazardous Waste Management Section

Enclosures

FACILITY DOCUMENT LOG DETAILS:


[Back to main page](#)

Document Log ID: 5095

ENVIRONMENTAL ENTERPRISE OF FLORIDA INC

City: Orlando ,County: Orange ,Login Name: Sullivan_TA

HWR : hazmatfl@att.net

	Process	Date
Logged		3/3/2009 2:59:38 PM
Completeness Review		3/5/2009 3:38:51 PM or

	Author
Sullivan_TA	

Sullivan_TA

[Add new process](#)

Date	Comment
3/5/2009 2:56:37 PM	Per Michelle Chambers this facility is not a transfer facility for mercury.

[Add new comment](#)

Author

Sullivan_TA

Sullivan_TA

[Add comment](#)



8700-12FL - FLORIDA NOTIFICATION OF REGULATED WASTE ACTIVITY

DEP Waste Management Division-HWRS, MS4560
2600 Blair Stone Rd. Tallahassee, FL 32399-2400
(850) 245-8772

Date Received
(for FDEP Official Use Only)

EPA ID **F L R 0 0 0 0 0 6 3 5 3**

MTS

RCRA Info

1. Reason for Submittal

Mark 'X' in
correct box:

- ☐ To provide **initial notification** (to obtain an EPA ID Number for hazardous waste, universal waste, or used oil activities).
- ☒ To provide **subsequent notification** (to update status and facility identification information).
- ☐ Is this the **final notification** (see instructions) for the facility?

2. Facility or Business Name

ENVIRONMENTAL ENTERPRISES OF FLORIDA, INC.

FEID No.

3 1 1 2 5 5 3 6 3

3. Facility Operator (List additional Operators in the comments section).

Name of Operator:

**ENVIRONMENTAL ENTERPRISES OF FLORIDA,
INC.**

☐ New Operator

Date became Operator: **01 / 03 / 1989**
mm dd yy

Street or P.O. Box:

314-B W. LANDSTREET ROAD

Phone Number:

800.762.9162

City or Town:

ORLANDO

State:

FL

Zip Code:

32824

Operator Type:

☒ Private

☐ Federal

☐ Municipal

☐ State

☐ Other

4. Facility Physical Location Information

Physical Street Address:

314 BLDG B W. LANDSTREET ROAD

City or Town:

ORLANDO

State:

FL

Zip Code:

32824

County:

Orange

If available, please attach a map or sketch of the facility boundaries.

Latitude: **28 43 57.93**

dd mm ss.ssss

Longitude: **81 38 31.52**

dd mm ss.ssss

Method:

Datum:

5. Facility North American Industry Classification System (NAICS) Code(s)

A.

562112

B.

C.

D.

6. Facility or Business Mailing Address

Street Address or P.O. Box:

314 BLDG B W. LANDSTREET ROAD

City or Town:

ORLANDO

State:

FL

Zip Code:

32824

7. Facility or Business Contact Person

First Name:

RONDAL

Last Name:

CHAMBERS

Title:

PRESIDENT

Phone Number:

407-855-0141

Extension:

E-Mail:

hazmatfl@att.net

Street or P.O. Box:

314-B W. LANDSTREET ROAD

City or Town:

ORLANDO

State:

FL

Zip Code:

32824

8. Real Property (Land) Owner of the Facility's Physical Location (List additional real property owners in the comments section.)

Name of Real Property (Land) Owner:

RONDAL G. CHAMBERS

☐ New Owner

Date became Owner: **01 / 03 / 1989**
mm dd yy

Street or P.O. Box:

5170 CYPRESS CREEK DRIVE

Phone Number:

407.352.8140

City or Town:

ORLANDO

State:

FL

Zip Code:

32811

Owner Type: ☒ Private

☐ Federal

☐ Municipal

☐ State

☐ Other

B. Universal Waste (UW) Activities (Mark 'X' in all that apply) ("accumulated" means at any one time):

- ☒ Large Quantity Handler (LQH) = 5,000 kg (11,000 lb) or more of any combination of UW accumulated
- ☐ Small Quantity Handler (SQH) = always less than 5,000 kg accumulated
- ☐ Mercury-containing devices LQH = 100 kg (220 lb) or more accumulated by for-hire handler
- ☒ Mercury-containing devices SQH = less than 100 kg accumulated by for-hire handler
- ☐ Mercury-containing lamps LQH = 2,000 kg (4400 lbs/8,000 lamps) or more accumulated by for-hire handler
- ☒ Mercury-containing lamps SQH = less than 2,000 kg (8,000 lamps) accumulated by for-hire handler
- [Note: 4 lamps = 1 kg, 62-737.200(10)]
- ☒ Pharmaceuticals LQH = 5,000 kg or more of universal pharmaceutical waste (UPW) accumulated
- ☒ Pharmaceuticals LQH = more than 1 kg (2.2 lb) of acutely hazardous ("P-listed") pharmaceutical waste accumulated
- ☐ Pharmaceuticals SQH = always less than 5,000 kg of UPW and always 1 kg or less of acutely hazardous UPW accumulated

(1) For those Managing	Generate/ Accumulate	Transport (see note in instructions)	Handle at Transfer Facility	(2) Enter your estimate of the maximum amount (in pounds) of each type of UW on site or transported at any one time.
a. Batteries	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	1000 LBS
b. Pesticides	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	60 LBS
c. Pharmaceuticals	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	1000 LBS
d. Mercury Containing Devices	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	25 LBS
e. Mercury Containing Lamps	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	1000 LBS

(3) Mercury Recovery and/or Reclamation Facility ☐ [Chapter 62-737, F.A.C.]

Note: A hazardous waste permit is required for this activity. [Rule 62-737.800, F.A.C.]

(4) Reverse Distributor of UW ☐ Pharmaceuticals ☐ Lamps ☐ Devices ☐

(5) Destination Facility for UW ☐ Note: for this activity, a facility must treat, dispose or recycle a UW. A permit is required for storage prior to recycling.

C. Used Oil Activities:**(1) Used Oil Transporter - indicate type(s) of activity(ies):**

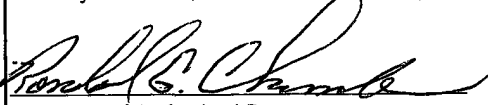
- ☒ a. Transporter
- ☒ b. Transfer Facility

(2) ☒ Collection Center**(3) ☐ Used Oil Processor** (A permit is required for this activity.)**(4) ☐ Off-Specification Used Oil Burner****(5) ☐ Used Oil Fuel Marketer****(6) Used Oil Filter**

- ☒ a. Transporter
- ☒ b. Transfer Facility
- ☐ c. Processor
- ☐ d. End User

(8) Specific Certification to be signed by all Used Oil Transporters

I certify as a Used Oil Transporter that the training program and financial responsibility required under Section 62-710.600, F.A.C., are in place, current and being adhered to. If any modifications have been made to the originally approved training program, they are explained in attachments to this registration form. Evidence of financial responsibility is demonstrated by the attached Used Oil Transporter Certificate of Liability Insurance, DEP form 62-710.901(4), F.A.C.



Signature of Authorized Person

RONDAL G. CHAMBERS

Print Name of Authorized Person

(7) Used Oil Transporters, Transfer Facilities, Collection Centers, Off-Specification Burners and Marketers must pay an annual \$100 registration fee. Used Oil Processors are exempt from this fee. If applicable, enclose a check or money order, in the amount of \$100, payable to Florida Department of Environmental Protection.

☐ A check is enclosed.

RONDAL G. CHAMBERS

(9) The records required under the provisions of Rule 62-710.510, F.A.C., are kept at (check one):

- ☒ our mailing (business) address
- ☒ The site (facility) address

D. Other State Regulated Waste Activities:☐ **Petroleum Contact Water (PCW) Handler** [Chapter 62-740, F.A.C.]

Note: A water facility permit may be required for this activity.

10. Waste Codes for Federally Regulated Hazardous Wastes: List the waste codes of the Federal hazardous wastes handled at your facility. List them in the order they are presented in the regulations (e.g., D001, D003, F007, U112).

Hazardous waste transporters list codes routinely or usually transported. Use an additional page if more spaces are needed.

1 ALLD	2 ALLF	3 ALLP	4 ALLU	5	6	7
8	9	10	11	12	13	14
15	16	17	18	19	20	21
22	23	24	25	26	27	28

11. Other Status Changes (Mark 'X' in all that apply):**A. Non-Handler of Regulated Waste at This Facility**

- ☐ (1) Business no longer generates, transports, treats, stores, or disposes of hazardous waste
- ☐ (2) Waste generated by business has been delisted.
- ☐ (3) Other (explain) _____

B. Facility Closed

- ☐ (1) Closed at this location and **moved or moving** to another - submit a new Form 8700-12FL for the new location if you will be handling regulated waste there.
- ☐ (2) Out of Business - Business closed on _____ (Date). Please provide a contact person, mailing address, and phone number where you can be reached after closing.

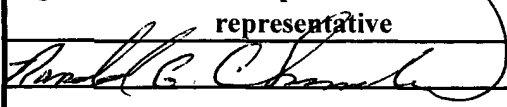
Contact _____ Phone _____

Address _____

City, State, Zip _____

☐ **C. Property Tax Default**☐ **D. Petition for Bankruptcy Protection**

12. Certification: I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. The information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations. If I have notified as a transfer facility, I am aware that transfer facilities must comply with the requirements of Rule 62-730.171, FAC, and Rule 62-730.182, FAC.

Signature of owner, operator, or an authorized representative	Print Name and Title	Date Signed (mm-dd-yyyy)
	RONDAL G. CHAMBERS	02-27-2009

If the person who filled in this form is not the Facility Contact or Operator, please complete the information below:

MICHELLE A. CHAMBERS

800.762.9162

hazmatfl@att.net

(Name of person completing this form)

(Phone Number)

(E-mail Address)

13. Comments:

See attached map of facility and additional information for Longitude and Latitude directions.

The listed waste codes are transported only if the Designated T/S/D/F accepts these waste codes and an approval has been received.



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2600 Blair Stone Road
Tallahassee, Florida 32399-2400

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UNIVERSAL WASTE LAMP AND DEVICE TRANSPORTER AND TRANSFER FACILITY INFORMATION CHECKLIST

The Department requires that all universal waste lamp and device transporters and transfer facilities registered under Rule 62-737.400, F.A.C., complete and sign this Information Checklist. This information will be used to evaluate compliance with subparagraph 62-737.400(1)(b), F.A.C. **Your transporter registration will not be issued until you complete and return the checklist.** Handlers that are not engaging in transport activities need not complete this form.

ENVIRONMENTAL ENTERPRISES OF FLORIDA, INC.		FLR000006353	
314-B W. LANDSTREET ROAD ORLANDO FL		(EPA id)	
32824			
(Street Address)	(City)	(State)	(Zip)
407.855.0141	407.855.0354	hazmatfl@att.net	
(Phone)	(Fax)	(E-mail)	

Section 1: For all transporters and transfer facilities (in-state and out-of-state).

Complete all sections and check all boxes that apply.

- Estimated number of LAMPS handled during the last calendar year. 2751
Types: Fluorescent ☒ HID ☒
- Estimated number of DEVICES handled during the last calendar year. 132
Types: Thermostats ☒ Electric Switches/Relays ☒
Thermometers ☒ Manometers ☐ Other ☐
- Estimated weight of DEVICES handled during the last calendar year. 200 lb.
- Estimated number of lamps or devices you shipped to each lamp recycling facility. Check the boxes for lamps (L) or devices (D). Give the facility name, location, and contact information.

Number	L	D	Facility Name	City	State	Phone
OHD980568992	<input checked="" type="checkbox"/>	<input type="checkbox"/>	ENVIRITE OF OHIO, INC.	CANTON	OH	330.456.6238
OHD083377010	<input type="checkbox"/>	<input checked="" type="checkbox"/>	ENVIRONMENTAL ENTERPRISES	CINCINNATI	OH	513.541.1823
	<input type="checkbox"/>	<input type="checkbox"/>				
	<input type="checkbox"/>	<input type="checkbox"/>				
	<input type="checkbox"/>	<input type="checkbox"/>				
	<input type="checkbox"/>	<input type="checkbox"/>				

Michelle A. Chambers
Print Name of Authorized Agent

Michelle A. Chambers 02/27/2009
Signature of Authorized Agent Date



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2600 Blair Stone Road
Tallahassee, Florida 32399-2400

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Section 2: For out-of-state transporters and transfer facilities only

1. Is any environmental agency in your state aware of your activities as a transporter or transfer facility for universal waste lamps and devices in Florida?

Yes ☒

No ☐

2. If you have not already done the following in previous years, please enclose some written verification from that environmental agency that they are aware of your activities as a transporter for universal waste lamps and devices in Florida and in your state. This verification can be in the form of a letter to you or to the Department, a registration, a permit, etc.

Submitted Previously ☒

Submitted in What Year? 2008

Michelle A. Chambers

Print Name of Authorized Agent

Michelle A. Chambers

Signature of Authorized Agent

02/27/2009

Date

Complete, sign and return this checklist along with your registration form to:

EPA ID Notification Coordinator
Hazardous Waste Regulation Section MS 4560
Department of Environmental Protection
2600 Blair Stone Road
Tallahassee, Florida 32399-2400

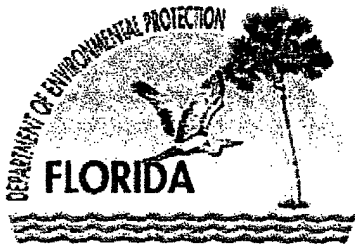
Your transporter registration will not be issued until you complete and return this checklist.

QUESTIONS OR COMMENTS?

If you have any questions or comments, please contact Laurie Tenace at (850) 245-8759 or via e-mail at laurie.tenace@dep.state.fl.us.

Thank you for your cooperation in providing this information.

TransChkl.doc



Florida Department of Environmental Protection

Bob Martinez Center
2600 Blairstone Road
Tallahassee, Florida 32399-2400

Charlie Crist
Governor

Jeff Kottkamp
Lt. Governor

Michael W. Sole
Secretary

HAZARDOUS WASTE TRANSPORTER CERTIFICATE OF APPROVAL

This is to certify that the carrier specified below has been approved as a hazardous waste transporter in Florida. The terms and conditions of this certificate require that the holder comply with all applicable portions of Chapter 62-730, Florida Administrative Code. This certificate shall be rendered null and void if any information contained within becomes obsolete. The certificate shall remain valid through the expiration date specified below.

TRANSPORTER: Environmental Enterprise Of Florida Inc

FACILITY ID NO: FLR000006353

FACILITY ADDRESS: 314 W Landstreet Rd # B
Orlando, FL 32824-7803

INSURANCE CARRIER: GREENWICH INSURANCE

INSURANCE POLICY#: AEC000958807

EFFECTIVE DATE: July 01, 2008

EXPIRATION DATE: July 01, 2009

APPROVED TRANSFER FACILITY: YES

APPROVAL ISSUED BY: Richard Neves DATE: July 29, 2008

Richard Neves

Hazardous Waste Management Section

850/245-8755

Are your services commercially available? _____

STATE OF FLORIDA

HAZARDOUS WASTE TRANSPORTER STATUS FORM

I. Transporter Identification:

Transporter Name: ENVIRONMENTAL ENTERPRISES OF FLORIDA, INC.
Transporter EPA ID: FLR 000 006 353
Location Address: 314-B W. LANDSTREET ROAD
ORLANDO, FL 32824

Contact: MICHELLE CHAMBERS Telephone: 407-855-0141
Mailing Address: SAME AS ABOVE

II. Insurance Information:

Insurance Company: GREENWICH INSURANCE COMPANY
Address: 70 SEAVIEW AVENUE STAMFORD, CT 06902-6040

Contact: FRANK SOLDANO Telephone: 800-327-1414
Policy Number: AEC000958807
Expiration date: 07/01/2009

III. Waste Information:

EPA Waste Codes for Waste Routinely or Usually Transported:

ALL "D" ALL "F" ALL "U" ALL "P"

Comments: THE ABOVE WASTE CODES ARE TRANSPORTED ONLY IF THE T/S/D/F
IS PERMITTED TO ACCEPT THESE CODES.

Poor Original

IV. Certification:

I certify under penalty of law that the above information is true, correct, and complete to the best of my knowledge.

MICHELLE A. CHAMBERS

MANAGER

Print/Type Name

Title

Michelle A. Chambers

06/24/2008

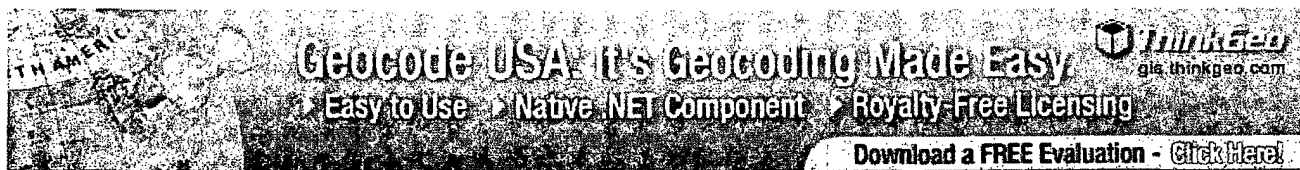
Signature

Date Signed

V. The transporter identified above is in compliance with the financial responsibility requirements for hazardous waste transporters pursuant to Chapter 62-730.170, Florida Administrative Code. The forms submitted by the transporter show compliance with the financial responsibility through 7/01/2009

Date

APPROVED by Sebrina L. Bolton, changes approved by the Certifier by phone 7/29/2008



geocoder.us / geocoder.net

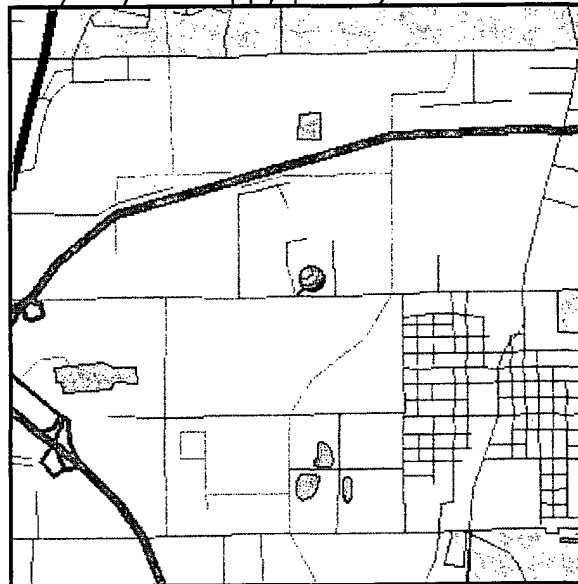
find the latitude & longitude of any US address - for free

Address 314 W Landstreet Rd
FL 32824
(28.435793, -
81.383152)

Latitude 28.435793 °
N 28 ° 26' 8.9"
28 ° 26.1476' (degree
m.mmmm)

Longitude -81.383152 °
W 81 ° 22' 59.3"
-81 ° 22.9891' (degree
m.mmmm)

(it can take a bit for the map to load-
wait for the red circle to turn green.
Stay in your happy place.)



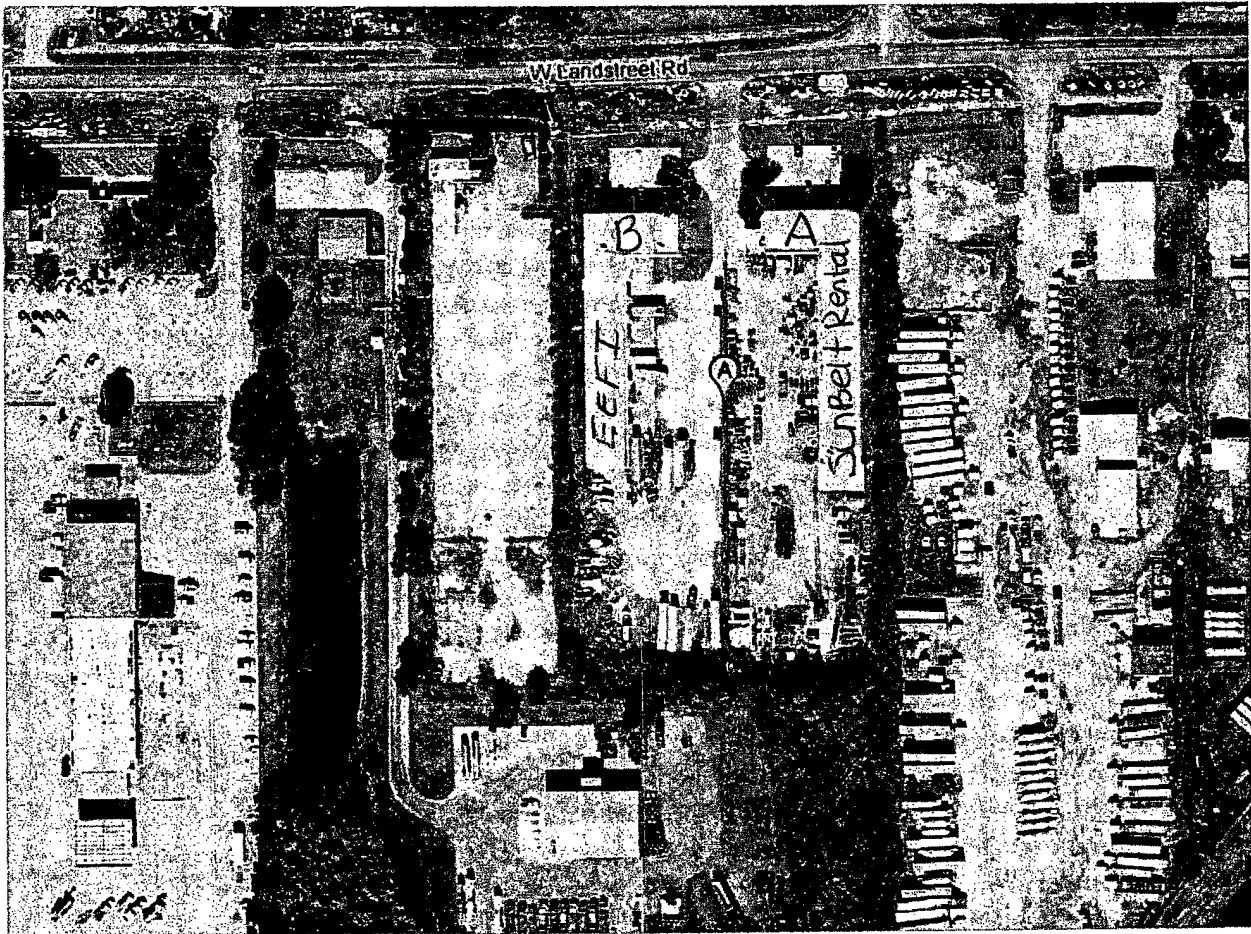
Search for another address:

314 W. LANDSTREET ROAD ORLANDO, FLO

And You might try adding a comma between the street and the city name, as this often helps to disambiguate complex addresses. If you'd like help, drop an e-mail to missing@geocoder.us, and we'll try to help you find your location.

If you want a bunch of addresses geocoded you can send a file (text or Excel work fine) to the same address. They will be geocoded and sent back to you. If you are happy the cost is \$50 per 20,000 records with a minimum cost of \$50, which you can pay via paypal to

Google Maps Address



Poor Original

Google Maps Address



Poor Original

EXCEL
ENGINEERING CONSULTANTS, INC.
Environmental & Civil Engineers

***Hazardous
Waste Transfer Facility
Closure Plan***

Prepared For:
Environmental Enterprises of Florida, Inc.
314 B Landstreet Road
Orlando, Florida 32824

AUGUST 1995

HAZARDOUS WASTE TRANSFER FACILITY CLOSURE PLAN

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 - Closure Schedule*
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 - Changes in Operating Plans of Facility Design Affect of the Closure Plan*
 - Notices of partial or Final Closure*
 - Closure Cost Estimate*
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I. INTRODUCTION

The Closure Plan addresses operations that will be conducted to ensure that all wastes will be properly disposed of, and that all traces of contamination will be removed from the units where hazardous wastes were handled when the facility ceases its operation for an indefinite time and wishes not to be regulated under the Resource Conservation and Recovery Act (RCRA). Submittal of a Closure Plan in accordance with the provisions in 40 CFR Part 265.111, 265.112(c), 265.114 and 265.115 is mandated in the Florida Department of Environmental Protection (FDEP) 62-730.

II. PROJECT DESCRIPTION

Environmental Enterprises of Florida, Inc. (EEFI) is a hazardous waste transfer facility located at 314 B West Landstreet, Orlando, Florida 32824 in Section 2, Township 24 south, Range 29 east, Orange County. The project is located approximately 7,900 feet east of the intersection of US 441 and West Landstreet Road. The project is a permitted hazardous waste transfer facility in accordance with 62-730, FA C. The facility's EPA ID Number is FLR000006353. The facility site is approximately 600 feet by 150 feet with an approximate area of 90,000 square feet (2 acres). The site has one operations building, one temporary storage area for metal roll-off containers, one temporary storage area for tractor trailers, and parking area for the empty trailers and trucks. The temporary storage area is diked in order to contain any discharges (see attached plan).

The site's soils are classified by the United States Geological Survey to be predominantly Smyrna Fine Sands with inclusions of Bassinger sands and Pomello sands. Smyrna Fine Sands have a depth to the water table of approximately one to two feet. These soils are typically silty poorly drained soils.

III. OPERATIONS

The facility is a permitted hazardous waste transporter with an approved Contingency and Emergency Plan. The transporter collects hazardous and non-hazardous waste from various generators. The wastes are stored in sealed 55 gallon drums or sealed roll-off bins which the transporter picks up at the generators site. Trucks and trailers are loaded with the wastes and the wastes are hauled to various permitted TSD facilities for final disposal. Wastes are temporarily stored on site for periods exceeding 24 hours but less than 10 days. The waste is never off-loaded at this site. Therefore there is never any contact between the drums and the site. The drums remain in the trailers until the trailer leaves the site. Furthermore, the drums are never opened on-site.

The trailers which have drums or roll off bins with hazardous waste materials will be parked in the areas designated on the site plan. These areas are paved with 6 inch

thick concrete and bermed with a continuous asphalt berm. Any leaks that may occur will be contained within these designated areas. Any discharges will be remediated in accordance with EEFI's Emergency Plan on file with the FDEP. No trailers with hazardous waste drums or roll off bins will be stored outside the designated impervious and contained areas. The shell staging areas shown on the attached site plan are for storage of empty tractor trailers and for maneuvering the tractor trailers.

Clean drums are stored inside the miscellaneous storage area. These drums are delivered to the generators' location for use by the generator. None of the filled drums are off-loaded at this site. The drums remain in the trailers until final off-site disposal. There is no cleaning of drums, equipment or trailers at the facility. Any leaks or discharges are covered under the approved Emergency And Contingency Plan and the transporter will follow the approved plans in the event than a leak or discharge occurs.

IV. CLOSURE PERFORMANCE STANDARD

Upon final closure of the facility, Environmental Enterprises of Florida, Inc. plans to remove all the waste in storage at that time, conduct a facility inspection to determine if there are any areas which require cleanup and clean any areas that may show signs of contamination. Since the facility does not off load any drums from the trailers there is no drum storage area. Additionally there is no cleaning of drums, trailers or equipment at the facility. Therefore there are no specific areas to decontaminate.

V. CLOSURE PLAN

Expected Year Of Closure

This facility is expected to operate for twenty five years from the start of the operation. Partial closure will not occur because the facility is too small for part of it to be isolated and still allow for the parking of the trailers.

Estimate Of Maximum Inventory

The maximum amount of hazardous waste to be stored at this facility over the facility's 25 year life is expected to be approximately 4, 787,500 gallons of liquid waste stored in 55 gallon drums and 36,250 cubic yards of solid waste stored in roll-off bins and 1 yard. bags.

Removal of Inventory

Inventory of the waste remains in the trailers until its final off-site disposal. The trailers along with the containerized hazardous waste inside the trailers will be moved to another permitted location or taken to its final destination at the time of closure. It appears most likely that the hazardous waste will be transported to the Perma Fix Environmental facility FLD980711071 located in Gainesville, Florida. However, it may

also be transferred to other permitted TSD facilities which EEFI Utilizes. This will be determined at time of closure.

Decontamination Of The Facility

Since there is no off loading of drums at the facility there will not be any specific areas to decontaminate at closure. Leaks and discharges that occur during the operation of the facility are covered under the approved Contingency and Emergency Plan. A site inspection will be performed to determine if there are areas which require cleaning. This will be accomplished in a manner approved by the FDEP. Any areas that have hazardous waste spills will be handled in accordance with the facility's Emergency Plan on file at the FDEP.

Any contaminated soils will be excavated and stored in drums for off-site disposal at a permitted hazardous waste disposal facility.

Closure Schedule

Closure of the facility will be completed within a 30 day period in accordance with the following schedule:

*Inventory Removal 5 days
Inspection Of Facility 5 days
Cleanup 5 days
Certification Of Closure 5 days*

Amendment Of The Closure Plan

The facility will submit a written notification to the regulating agency whenever changes are needed or occur at the facility that affect the closure plan. The notification will contain an amendment to the closure plan reflecting modifications needed because of changes at the facility. The written notification will be submitted whenever of the following occurs:

Changes in operating plans or facility design affect the closure plan.

- 1. There is a change in the expected year of closure.*
- 2. Partial or final closure activities are conducted and unexpected events require a modification of the approved closure plans.*
- 3. The facility will submit the written notification for approval at least 60 days prior to the proposed changes, or no later than 60 days after an unexpected event has occurred that forces changes at the facility, which affect the closure plan.*

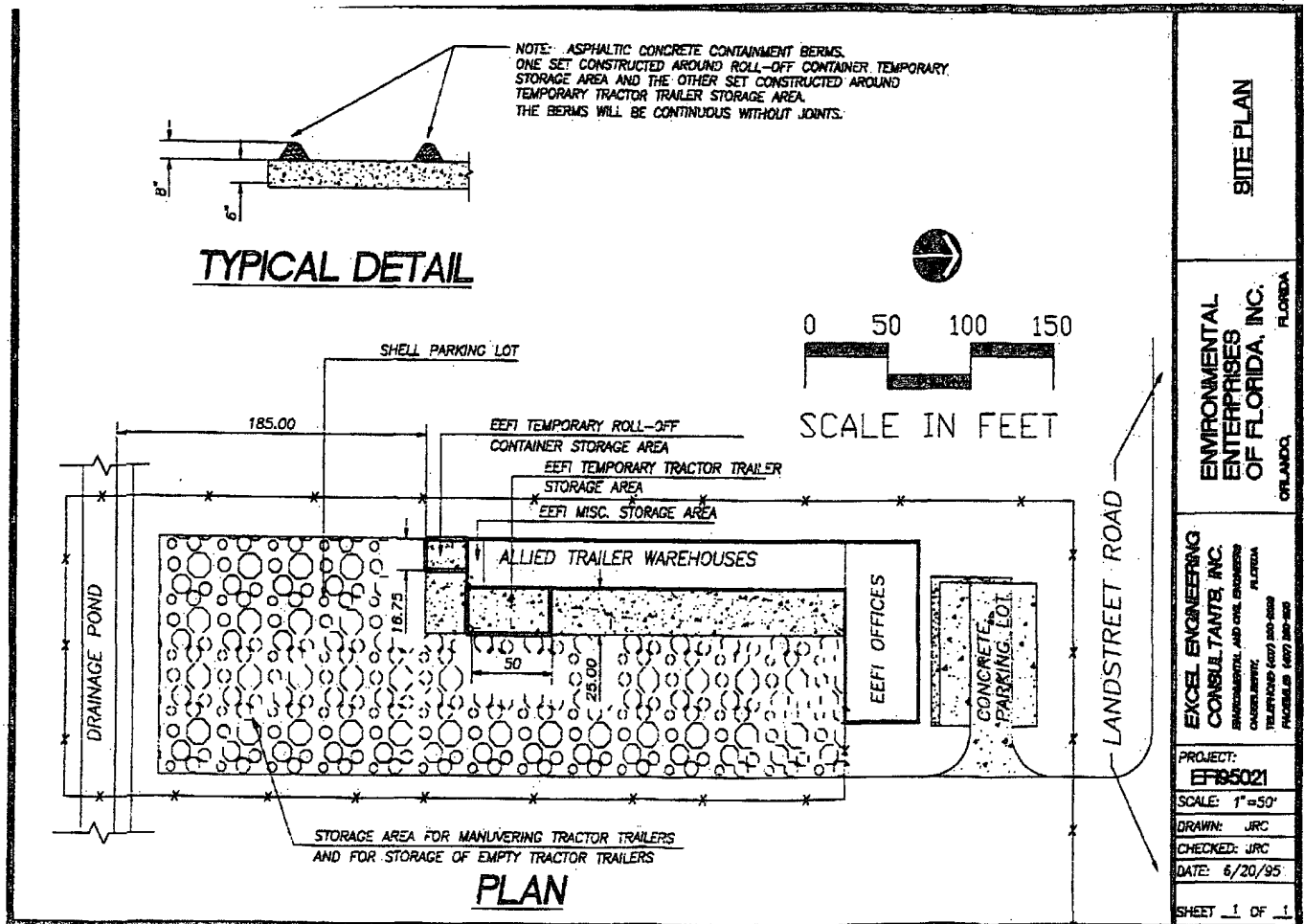
Notification of Final Closure

The facility will notify the regulating agency in writing at least 45 days prior to the date on which it expects to begin partial or final closure at the facility.

Closure Cost Estimate

-Inventory Removal:	500.00
-Inspection of Facility	300.00
-Cleanup (contingency)	1,000.00
-Certification of Closure	500.00
Subtotal:	2,300.00
-Administrative Costs	500.00
Total:	2,800.00

Poor Original



SITE & HIGHWAY SPILL CONTINGENCY PLAN AND CLEAN UP PROCEDURE



SITE & HIGHWAY SPILL CONTINGENCY PLAN AND CLEAN UP PROCEDURE

INTRODUCTION

All personnel involved in the transportation of hazardous waste endeavor to keep an emergency involving those materials from ever taking place. Adhering to strict compliance with regulation set forth by the State and Federal governments will greatly minimize the chance of an emergency situation involving these materials from occurring.

If an emergency does occur, however, there are certain actions that must be taken to protect lives and property. It is essential that all persons who come into frequent contact with hazardous wastes be familiar with emergency procedures. Prompt action on the part of all concerned will enable many emergencies to be controlled and minimize the possibility of injury and property damage.

In the event of a spill of hazardous waste on the highway, the personnel specified are to respond as described in the following procedures:

PROCEDURES

DRIVER RESPONSIBILITIES

- a. Keep unauthorized persons away from spilled materials. Remain with your vehicle and advise pedestrians and motorists of the potential danger. Ask someone to notify the local police and fire departments.
- b. Set up warning devices surrounding your vehicle. When the police or fire department arrives, request the area to be blocked off to both pedestrians and motorist to prevent any injury or damage.
- c. Wearing the appropriate protection (gloves, boots, tyvek suit, respirator, etc.), dam-up or dike off spilled materials using the non-combustible absorbent in your emergency equipment. Use only rubber/plastic shovels to move materials. Protect the spill from entering sewers, ponds, rivers, etc.
- d. Contact the emergency coordinators at E.E.F.I. as soon as possible:

Rondal G. Chambers	(800) 762-9162 (Work)
	(407) 855-0141 (Work)
	(800) 223-8140 (Home)
	(407) 352-8140 (Home)
	(407) 948-2205 (Cell)

**when paging or leaving a message, please indicate if it is an emergency by saying or numerically entering star (*) 911 .*

Michelle Chambers (800) 762-9162 (Work)
(407) 855-0141 (Work)
(407) 466-7869, (Cell)

Robert Chambers (800) 238-3230 (Work)
(478) 944-8011 (Work)
(678) 300-6779 (Cell)

**when paging or leaving a message, please indicate if it is an emergency by saying or numerically entering star (*) 911 .*

Have the following information ready for the emergency coordinators:

- * Report all injuries
- * Product name of material spilled
- * T/S/D profile number, RCRA code, DOT classification
- * Generator name
- * Amount of spill
- * Cause of spill (i.e. leaking container, defective valve, etc.)
- * Exact date, time and location of incident
- * Report your recommendations for equipment needed to clean up or repair damage

EMERGENCY COORDINATOR RESPONSIBILITIES

- a. Emergency coordinators shall notify immediately the following:

XL Environmental WINS# 0000106045
Environmental First Response 1(800) 823-7351
CHEMTREC (chemical info) 1(800) 424-9300
Sunbelt Rental
Emergency Equipment 1(407) 816-8008

State (DEP/District office) Officials (407) 894-7555
DCA STATE WARNING POINT 1-850-413-9911 or 1-800-320-0519
National Response Center 1-800-424-8802
Orange County Florida EPD Local office 1-407-836-1400

In Alabama contact:
Hazardous Materials/Waste Incidents 1(800) 843-0699
U.S. Coast Guard (Mobile, AL) 1(334) 639-6287

Alabama, Continued
Alabama Emergency Management Agency 1(800) 356-9596
1(205) 280-2200
Alabama Dept. of Public Safety 1(334) 242-4378
Alabama Dept. of Environmental Management 1(334) 260-2700

- b. If it is estimated that the material presents an extreme hazard or if more than 500 gallons of any material has spilled, the Emergency Coordinator and a Quality Control Chemist must accompany the clean up crew to the site. It is up to the discretion of management to send a Quality Control Chemist in all other circumstances.
- c. Within fifteen (15) days of any spill, a report must be made by the Emergency Coordinator, in duplicate form, on Form ES800.1 and submitted to the Secretary of Hazardous Materials Regulations Board, Department of Transportation, Washington, DC 20590. A copy of the hazardous waste manifest must be attached to this report.

EMERGENCY EQUIPMENT

Each hazardous waste transporting unit carried the following emergency equipment:

In Driver Emergency Bag:

- a. Gloves
- b. Goggles
- c. Boots
- d. Hard hat
- e. Rubber shovel
- f. Respirator (Full Face)
- g. DOT Emergency Response Guidebook
- h. Skin and eye neutralization solution
- i. First Aid Kit

In Tractor Unit:

- a. Emergency reflectors
- b. 10 lb. ABC fire extinguisher

In Trailer Unit:

- a. Over pack/recovery drum (85 gallon)
- b. Non-combustible absorbent material

NOTE: Van trailers are equipped with a solvent and acid resistant membrane liner that cover the walls and floor of the vehicle and extends beyond the trailer door to allow for self-containment of leaking drums on the trailer.

DECONTAMINATION OF EQUIPMENT FOLLOWING A SPILL OR LEAK

- a. A truck or trailer exposed to a spill or leak will be decontaminated as much as possible at the spill site to prevent further release. All contaminated debris is to be properly packaged for further shipping and disposal. Thorough decontamination/Highway Spill Contingency Plan cleaning of equipment and supplies used will be performed at the receiving T/S/D facility or at a commercial tank cleaning facility.
- b. Notification will include a written report compiled by the driver involved and the emergency coordinators and submitted to the Department of Transportation, Director of Hazardous Materials Registration, Materials Transportation Bureau, Washington, D.C.

20590 including the nature of the incident and response, remediation. All State agencies (such as the Alabama Department of Environmental Management) will be supplied with a copy of this notification.

CLEAN UP RESPONSIBILITIES

- a. If possible, immediately repair the leaking vessel to prevent further leakage.
- b. If on site repair is possible, empty remaining material with a vacuum unit.
- c. Collect spilled materials that have been diked or absorbed, contaminated soil or asphalt, damaged shipping containers, and any other contaminated debris and place in proper shipping containers for proper disposal.
- d. The ground at the spill site must be sampled weekly and returned to the lab for analysis to ensure clean up is complete.

TRAINING OF PERSONNEL

All Employees at Environmental Enterprises of Florida, Inc. are trained upon initial employment 40-hours and December of every year 8-hours refresher. When ever a safety issue or policy or regulatory regulation change occur a retraining is implemented. Drivers have monthly safety meeting with the Dispatch Department, Human Resource Manager and Environmental Safety Compliance Manager are present.

- A. Hazardous waste manifesting DOT 49 CFR 172.704
- B. Container receiving and maintenance
- C. Container inspections
- D. Container Transferring
- E. Container Pickup checklist
- F. Re-use of Containers for Hazardous Waste
- G. Emergency Response Equipment
- H. Emergency Procedures and Contingency Plans for all policies
- I. Hazardous, Non Hazardous and Universal waste Labeling DOT 49 CFR 172.704
- J. Product Compatibility and Lab Packing Procedures 40 CFR 262.00 and 265.00
- K. In-house Maintenance Checks
- L. Emergency Spills
- M. Fire Extinguishers use and recognition (Drivers and warehouse only)
- N. Bloodborne Pathogens and Universal precaution 29 CFR 1910-1030
- O. Forklift Operation (Warehouse only)
- P. Confined Space and Proper fit test on all Respirator usage
- Q. 10 Hour General Industry training 29 CFR OSHA 1910-1200
- R. Homeland Security HM-232
- S. Used Oil Handler Used Filter Handler & Transporter Training
- T. HHW and Universal Waste Transporter and Handler Training

¹Contingencyplan/juleestuff

Environmental Enterprises of Florida, Inc.

FLORIDA OFFICE

314-B Landstreet Road
Orlando, Florida 32824
Tel: (407) 855-0141
Toll free: (800) 762-9162
Fax: (407) 855-0354

GEORGIA OFFICE

162 Town Creek Road
Forsyth, Georgia 31029
Tel: (478) 994-8011
Fax: (478) 994-8197

IN THE EVENT OF AN EMERGENCY: CONTACT

Rondal G. Chambers/President----- (800) 762-9162 (Work)
Orlando, Florida (407) 855-0141 (Work)
(800) 223-8140 (Home)
(407) 352-8140 (Home)
(407) 948-2205 (Cell)

Robert Chambers ----- (800) 238-3230 (Work)
Forsyth, Georgia (478) 944-8011 (Work)
(678) 300-6779 (Cell)

Michelle Chambers ----- (800) 762-9162 (Work)
(407) 855-0141 (Work)
(407) 466-7869, (Cell)

U.S Coast Guard National Response Center: (800) 424-8802

Last update 01/2009

HM-232

HAZARDOUS MATERIALS SECURITY PLAN

September 2003

HAZARDOUS MATERIALS SECURITY PLAN

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HAZARDOUS MATERIALS SECURITY PLAN

SECTION I – INTRODUCTION

Plan Statement

Environmental Enterprises of Florida, Inc. (E.E.F.I.) is committed to the safe and secure handling and transporting of hazardous materials. E.E.F.I. is also committed to ensuring the physical safety of all hazmat employees and to reduce or prevent hazardous materials cargo theft opportunities.

Plan Objectives

The objective of this plan is to ensure the safety of our hazardous materials employees and the security and integrity of hazardous materials from point of origin to final destination.

Scope

E.E.F.I.'s written Hazardous Materials Security Plan contains the following three basic areas:

1. Personnel Security
2. Unauthorized access
3. En Route security

Risk Assessment

E.E.F.I. has completed a Hazmat Transportation Risk Assessment as required.

HAZARDOUS MATERIALS SECURITY PLAN

SECTION II – PERSONNEL SECURITY

2.0 Security Training

E.E.F.I. ensures that all employees are provided with thorough security training. All employees will be trained in, and are expected to be familiar with, the company's security plans and procedures. At a minimum, this training includes detailed instruction regarding our:

- Overall security objectives
- Individual employee security responsibility
- Specific security procedures
- The organization's security structure.

List of general employee security responsibilities:

- **Senior Management** is responsible for establishing and communicating the overall security goals of the organization.
- **Managers and Supervisors** are responsible for being fully knowledgeable of the security issues and concerns of their area(s), departments and employees. In addition, they are responsible for providing detailed information on system operations including daily work processes, activities, and identifying potential security vulnerabilities. Once identified, managers and supervisors are responsible for:
 1. Selecting, prioritizing, developing, and implementing strategies and procedures to meet established security goals;
 2. Measuring and monitoring the effectiveness of the security strategies and procedures; and
 3. Reviewing and when necessary, adjusting the strategies and procedures. If deficiencies or other vulnerabilities are discovered in the security process, appropriate corrective action or adjustments will be made.
- **Employees** are responsible for adhering to and conforming to all security-related work activities, processes, and procedures. In addition, employees are encouraged to provide feedback and suggestions on ways to improve the organization's security program.

HAZARDOUS MATERIALS SECURITY PLAN

2.1 Suspicious Activity

All employees are expected to understand and adhere to the following corporate suspicious activity reporting procedures. They are intended for all employees to following the event any usual or suspicious activity that poses a threat to the safety of our employees and the security of our equipment, facilities, or hazardous materials cargo is observed.

2.1.0 Employer responsibility statement – E.E.F.I. provides a work environment that is reasonably free of hazards and threats of violence that may cause damage to property or harm to people. It is also our policy to establish an effective and continuous safety and security program that incorporates educational and monitoring procedures. All supervisors and managers are responsible for ensuring that their employees are trained in appropriate security and suspicious activity reporting procedures.

2.1.1 Employee responsibility statement – All employees have a responsibility to themselves and to E.E.F.I. to observe and report any suspicious or unusual activity that threatens safety or security.

2.1.2 Reporting procedures – Employees are expected to use common sense and good judgment when assessing the threat potential of any suspicious activity. Depending on the given situation, employees will be expected to report any observed suspicious activity to their immediate supervisor, next level manager, or the local law enforcement official or fire department.

E.E.F.I. defines suspicious activity to include (but not limited to) any of the following situations:

- Unidentified person(s) attempting to gain access to property, equipment, or facilities.
- Unidentified person(s) in any area of the company, office, yard, or parking lot.
- An employee, unescorted vendor, or supplier visiting a part of the office for no known reason.
- Any unescorted or unaccompanied visitor anywhere in the building or wandering around the yard or parking lot.
- Any person (employee or otherwise) who appears to be hiding something or is acting nervous, anxious, or secretive.
- Any employee or visitor making unusual or repeated requests for sensitive or important company documents or information.
- Any person asking an employee to make any unauthorized movement (pick-up or delivery) for cash (motor carrier specific).
- Any person or group loitering outside a company facility or premises.
- Any person claiming to be a representative of a utility (gas, water, electric) but cannot produce valid company identification.

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- Any person carrying a weapon such as a gun or knife
- After hours, any vehicle driving by a company facility with the lights off.
- Any vehicle parked outside a company facility – especially if the vehicle has been sitting for a long period or after normal work hours.
- An unfamiliar vehicle that appears to be abandoned near a company building or parking lot.

The above list is not all-inclusive. It is meant to provide possible examples of suspicious activities. Once, and if, a suspicious activity is identified, the next step is to act. Employees not only need to be able to identify suspicious activity, they also need to know what to do about it.

The following table is a list of Primary Responder phone numbers for each facility location:

	Location	Contact	Phone Numbers	Police Dept.	Fire Dept.
Environmental Enterprises of Florida, Inc.	Orlando, FL	Facility Ron Chambers Michelle Chamber Ismael Jusino	800-762-9162 800-223-8140 407-466-7869 407-466-7868	911	911
Environmental Enterprises of Florida, Inc.	Forsyth, GA	Facility Robert Chambers Ron Chambers	800-238-3230 678-300-6779 800-223-8140	911	911

2.2 HazMat Personnel Screening

All applicants applying for any position involving access to, handling, storing, preparing for transport, and/or transport of hazardous materials for E.E.F.I. shall submit an accurate, complete, signed and dated application for employment. The hiring/screening will continue once the information on the application has been verified as true and accurate.

An inquiry into the previous employment history shall be made for every qualified hazmat employee applicant. Hazmat employee applicants shall provide accurate and complete previous and current employer information upon request, including but not limited to:

1. Names and addresses of previous employers;
2. Names and titles of previous supervisors;
3. Phone numbers or other contact information for both of the above.

The employee hiring/screening process shall not continue until all previous employer information has been verified as true and accurate.

HAZARDOUS MATERIALS SECURITY PLAN

All qualified hazmat employee applicants applying for positions with E.E.F.I. shall be given an in-person interview by responsible company personnel. In-person interviews are used to determine fit for both the applicant and the company. In addition, the in-person interview should be used to verify any gap(s) in employment, reason(s) for job or career changes, or any other important or unexplained behavior or history.

Criminal Background Investigations: A criminal background check shall be made on all qualified applicants applying for any position involving the handling, storing, preparing for transport, and/or transport of hazardous materials. The criminal background check shall be made with regard to convictions of misdemeanors and felonies only.

Proof of Citizenship & Right to Work: All applicants applying for any position involving the handling, storing, preparing for transport, and/or transport of hazardous materials for E.E.F.I. shall be required to provide either proof of U.S. citizenship or proof of their legal right to work in the United States.

2.3 Driving Qualifications and Hiring Standards (motor carrier specific)

E.E.F.I.'s driver qualification and hiring procedures are in compliance with all applicable state and federal regulations, and meet the organization's security standards.

This company shall not consider applicants for employment as drivers unless they meet the following minimum requirements. Persons applying for the position of driver must:

1. Meet our minimum age (21 years) and applicable experience (two years) requirements.
2. Have a driving record that is in line with E.E.F.I.'s safety standards with regard to preventable motor vehicle accidents and violations of motor vehicle laws. (All past driving information provided by applicants shall be verified).
3. Be able to read and speak English sufficiently as required by §391.11(b) (2).
4. Be physically qualified to drive a company vehicle.
5. Possess a current and valid commercial driver's license of the correct type and with the proper endorsement.
6. Not be disqualified to drive a commercial motor vehicle under the rules set forth in §391.15.

HAZARDOUS MATERIALS SECURITY PLAN

All qualified applicants applying for the position of driver with E.E.F.I. shall submit an accurate, complete, signed and dated application for employment. The driver qualification and hiring process **shall not** continue until all information on the application has been verified as true and accurate.

An inquiry into the driving record during the preceding 3 years (10 years for positions requiring a CDL) shall be made for every qualified driver applicant. The inquiry shall be made to the appropriate agency of every state in which the applicant held a motor vehicle operator's license or permit. The driver qualification and hiring process **shall not** continue until all driving record information for the preceding 3 years (10 years for positions requiring a CDL) has been verified as true and accurate.

An investigation into the employment record during the preceding 3 years (10 years for positions requiring a CDL) shall be made for every driver applicant. Driver applicants shall provide accurate and complete previous and current employer information upon request, including but not limited to:

1. Names and addresses of previous employers;
2. Names and titles of previous supervisors;
3. Phone numbers or other contact information for both of the above.

The driver qualification and hiring process **shall not** continue until all previous employer information for the preceding 3 years (10 years for positions requiring a CDL) has been verified as true and accurate.

An investigation into the drug and alcohol history with regard to previous employers shall be made for every driver applicant per §40.25. The driver qualification and hiring process **shall not** continue until drug and alcohol information from previous employers for the preceding 2 years has been obtained and verified.

Responsible company personnel shall give all applicants applying for the position of driver with E.E.F.I. shall be given an in-person interview. In-person interviews are used to determine fit for both the applicant and the company. In addition, the in-person interview should be used to verify any gap(s) in employment, reason(s) for job or career changes, or any other important or unexplained behavior or history.

All applicants applying for the position of CDL driver with E.E.F.I. shall submit to a pre-employment drug screen as required by §382.301, and no driver applicant shall perform any work or activity for the company until a verified negative test result has been obtained for the applicant.

All applicants applying for the position of driver with E.E.F.I. shall be medically examined and certified as physically qualified to operate a commercial motor vehicle by a licensed medical examiner of our choosing.

HAZARDOUS MATERIALS SECURITY PLAN

Criminal Background Investigations: A criminal background check shall be made on all qualified applicants applying for the position driver. The criminal background check shall be made with regard to convictions of misdemeanors and felonies only.

HAZARDOUS MATERIALS SECURITY PLAN

SECTION III – UNAUTHORIZED ACCESS

3.0 External Partnerships

E.E.F.I. has established a partnership and professional working relationship with local law enforcement officials, emergency responders, and other public safety and security agencies. These partnerships include the sharing of E.E.F.I.'s operation, work processes, and hazardous materials stored on-site or transported. We provide basic information regarding hazmat operation, locations, and potential threats.

All suspicious activities or apparent criminal acts affecting the safety or security of E.E.F.I.'s interest shall be reported immediately to the proper law enforcement agencies and appropriate company officials. In addition, a detailed written report shall be made of any security-related incident.

A complete listing of emergency telephone numbers has been provided to all dispatchers, supervisors, and managers. This list includes the numbers for local police and fire departments, regional state police offices, the FBI and company managers and executives.

3.1 Information Security

All information (electronic and hard copy) relating to the storage and/or transporting of hazardous material is restricted to employees on a need-to-know basis. All hazmat related paperwork and other documentation is maintained and retained in a secure area with limited and controlled access.

Dispatch security procedures (motor carrier specific): All work/load assignment sheets (hard copy and/or electronic) involving the transportation of hazardous materials are maintained in a secure location. Access to hazardous materials load information is limited to operations personnel only, including dispatchers, the operation manager, and other designated employees.

Dispatch personnel are responsible for the security and proper issuance of all hazardous materials load-related work assignment documents. When providing load information to drivers, dispatchers shall review the load information to ensure that it is complete and accurate. For security purposes, it is extremely important that:

- The load assignment is clearly communicated;
- Trailer numbers on all work assignments are verified; and
- Shipping documents (i.e. manifests, BOLs) are checked and verified

In the event a trailer containing hazardous material(s) needs to be staged (for any length of time) in a terminal yard or other company facility, all load-related paperwork shall be brought into the dispatch office and maintained there until the driver is scheduled to

HAZARDOUS MATERIALS SECURITY PLAN

complete his run. Drivers failing to abide by this procedure are subject to disciplinary action.

All old operational, compliance-related, and hazardous materials records and documents shall be destroyed before being discarded.

3.2 Security Inspections

E.E.F.I. is committed to providing its employees a safe and secure work environment. We provide adequate security measures to ensure the safety of our employees, equipment, facilities, hazardous materials, and the general public. The following security guidelines cover safety and security issues related to external and internal security inspection procedures.

3.2.0 External Premises Security Inspections

Fences, Gates and Exterior Doors: At facilities where perimeter fencing is in place, safety or facilities maintenance personnel are responsible for establishing and following a written schedule for regular inspection of the fence and associated gate(s). Inspections are conducted at a rate of not less than once per month. All necessary repairs shall be performed as needed. At a minimum, all perimeter fencing shall meet the following specifications:

- Fencing shall be at least six feet high and securely anchored.
- The barrier should be hard to climb over to penetrate, and all fencing shall be installed in such a way so that no gaps are left between the fencing and areas where it butts up against a building.
- An adequate clearing on both sides of the barrier shall be maintained. Eliminate unnecessary gates or doors in the fencing, or secure them tightly.
- Broken fences, walls, and other barriers shall be repaired immediately. Safety or maintenance personnel will be responsible for developing and implementing a regular schedule of inspection.
- Possible entrances that go under the perimeter and could allow an unauthorized person to enter, such as culverts that pass under the perimeter, utility tunnels, or manholes leading into the facility shall be sealed.

Any unusual or suspicious damage to fencing or gates shall be reported to the Maintenance Department immediately.

Facilities maintenance personnel are responsible for ensuring areas adjacent to both sides (inside and outside) of the fence are properly maintained.

All exterior doors of any company building that open to the outside of the fenced perimeter shall remain locked at all times, including evening hours, weekends and holidays. In all cases, such doors are not to be used as main entrances or exits and are marked accordingly.

HAZARDOUS MATERIALS SECURITY PLAN

Terminal Security Signs: A security/warning sign is posted on all exterior doors and entryway gates. All signs used for safety or security purposes shall be conspicuously posted, clearly readable, and easily understood.

Signs posted at gate(s) of fenced terminal areas are recommended to read as follows:

NOTICE

NO ADMITTANCE – UNAUTHORIZED PERSONS OR VEHICLES NOT ALLOWED BEYOND THIS POINT – VIOLATORS WILL BE PROSECUTED

Signs posted on fencing are placed at intervals of not more than 200 feet, and recommended to read as follows:

NO TRESPASSING

Signs posted on building and terminal exterior doors are recommended to read as follows:

**PRIVATE BUILDING
UNAUTHORIZED PERSONS
PROHIBITED FROM ENTERING**

Exterior security lighting: Facility exteriors, grounds, and parking lots shall be well lighted by automatic security lighting devices, which may include:

- Dusk-to-Dawn mercury lighting;
- Motion sensing/detecting floodlights; and/or
- Automatic timer activated exterior lighting

Exterior security lighting shall be so sufficient as to illuminate the entire building exterior and surrounding grounds and to permit easy detection of any unauthorized intruder or trespasser.

Exterior security lighting are inspected at a rate of not less than once per month.

Doors, Windows, and Entryways: Exterior doors, windows and other entryways are inspected and maintained according to the following procedures. All exterior doors are secured with heavy-duty dead bolt-type locks.

All exterior doors are equipped with handle-key locks that must be opened and closed with a key, and will remain locked at all times to prevent easy access by unauthorized persons.

HAZARDOUS MATERIALS SECURITY PLAN

All keys to door locks are maintained in the terminal key control file. Responsible Safety or Operations personnel control this file. Issuance of exterior door keys is restricted to designated personnel.

All exterior windows shall be secured with locking devices that can withstand efforts to pry or force the window open.

All exterior doors and windows shall be inspected at a rate of not less than once per month.

3.2.1 Hazardous Materials Storage Security

All hazardous materials are stored in a locked and secured area with limited and controlled access. Authorized personnel only shall be allowed access to hazardous materials storage areas.

Periodic inventories of all hazardous materials on-site are conducted. Any shortages or discrepancies discovered shall be investigated and/or reconciled immediately.

3.2.2 Visitor, Vendors, and Supplier Security

All visitors, customers, vendors, and suppliers visiting E.E.F.I. shall be directed to park their vehicles in the area of the employee parking lot designated as "Visitor Parking".

Vendors and suppliers needing to make deliveries or pick-ups shall be directed to appropriate pick-up/delivery area by the responsible receiving/shipping personnel. Once the pick-up or delivery has been completed, the vendor/supplier shall immediately leave the company grounds.

All third party transportation must sign in upon arrival and provide proper photo identification (i.e. Driver's License, Company ID). The driver will then be instructed on where to park his vehicle until offloading.

Main entrance guidelines: A single point of entry has been designated for all general visitors to the facility.

All general visitors and customers are required to register upon arriving. Under no circumstances will a visitor to E.E.F.I. be allowed access without first registering at the designated entrance.

A written log is maintained for all general visitors to E.E.F.I. The written log includes:

HAZARDOUS MATERIALS SECURITY PLAN

- The name of the visitor and company he or she represents;
- The date and time of arrival
- Who approved or arranged the visit
- The date and time of departure

The written log is maintained for 3 months.

General visitor guidelines on-premise procedures: After registering, and depending on the reason for the visit, the visitor shall be either:

- Escorted to the appropriate area of E.E.F.I. by the responsible company employee (a copier repairperson being escorted to the broken copier in operations for example); or
- Met by the company employee who arranged the visit in the reception area, and escorted to his or her office or workstation.

Once the work/visit has been completed, the visitor shall be escorted to the main entrance, sign out and leave the company grounds.

Employee and Visitor Parking

Employees and visitors shall park only in areas specifically designated Employee/Visitor Parking. Unauthorized parking near or in a load/unloading dock or platform is strictly prohibited.

E.E.F.I. will be responsible for ensuring that employee-parking areas are adequately lighted, safe and secure.

Loitering on Company Property

E.E.F.I. has adopted a no loitering policy. Loitering in company buildings/terminals and on company grounds by any person(s), including employees is prohibited.

Managers and supervisors have been instructed to confront and question any person(s) observed loitering on company property. This policy applies to unauthorized or unknown person(s) as well as off-duty employees.

Employees (such as drivers waiting for dispatch or other employees on break) may congregate in designated areas only.

HAZARDOUS MATERIALS SECURITY PLAN

SECTION IV – EN ROUTE SECURITY

4.0 En Route Security (shipper specific)

Qualifying Motor Carriers: Before E.E.F.I. uses any motor carrier for the purposes of transporting hazardous materials, each carrier shall be qualified as follows:

- The carrier's current safety rating (SafeStat score) shall be considered, including a detailed review of all relevant safety-related data as found in the carrier's detailed profile summary report (via the web @ www.safersys.org), including
 - The carrier's current safety rating;
 - Recent compliance review/audit data; and
 - A review of all data found in all four Safety Evaluation Areas (SEAs)
- Carriers are responsible for ensuring their drivers remain qualified through a process of **annual review**, and will be asked to provide verification documentation of it upon request to E.E.F.I. At a minimum, carriers must demonstrate they have in place an appropriate and thorough background investigation process for all drivers, that, at a minimum include:
 - Previous employer inquiries;
 - Driving records review

Before loading any hazardous material, the identity of the driver and motor carrier shall be verified. Drivers will be asked to produce photo identification and current operator's or commercial driver's license (CDL).

- Verify that the motor carrier has terminal-to-truck tracking or communication capabilities.

4.1 En Route Security (motor carrier specific)

4.1.0 Point-of-Origin Driver Security Procedures

Upon arrival at the hazmat load's point of origin, all drivers shall check in with the responsible shipping personnel to notify them of arrival and to provide picture proof of identity. Drivers may also be expected to produce their current operator's or commercial driver's license (CDL). While at the shipper, drivers shall follow the loading instructions and obey all customer safety and security rules and procedures.

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At the designated loading location (assigned dock door), the driver shall secure the vehicle. No company vehicle will be left unattended until the driver is confident the vehicle is secured from moving.

4.1.1 Shipper Load & Count

In the event a driver is scheduled to pick-up a trailer pre-loaded with hazardous material(s), he shall verify:

- The load's shipping papers;
- Seal numbers; and
- Trailer numbers

Under no circumstances shall a driver be allowed or permitted to break a seal on a pre-loaded trailer or a trailer moving under a shipper's load and count provision. This guideline applies to outbound loads as well as loads being picked-up and returned to a terminal or spotting/staging area.

In the event of a live load, drivers are expected to supervise the entire loading process. Drivers are responsible to make sure no unauthorized or unscheduled cargo is loaded on any trailer.

When all loading activity has been completed, drivers are responsible for making sure the cargo is secure and to check the bill of lading or the delivery manifest to ensure cargo count is correct.

If a discrepancy is found between the cargo and bill of lading or shipping manifest, drivers shall contact their supervisor immediately for instructions.

Drivers are required to use their padlocks on van box trailers to provide additional cargo security for all loads containing hazardous materials. However, if using a padlock would cause damage to the trailer door seal, attempts to use the padlock should not be made.

Before leaving any shipper, drivers shall make a thorough visual observation of their immediate surroundings and report any unusual or suspicious activity to their supervisor immediately.

4.1.2 En Route Drivers Security Guidelines & Procedures

Dispatch/Operations shall make every effort, such as working with consignees, to arrange hazardous materials deliver schedules that minimize in-transit down time. In most cases, this means that dispatch will schedule loads for delivery as early as possible based on drivers' available hours and the consignee's receiving hours of operation.

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While in transit, drivers are **prohibited** from discussing information related to their load, route, or delivery schedule with any person(s) other than authorized company officials. Drivers failing to abide by this policy are subject to disciplinary action up to and including termination of employment. Drivers are to report any suspicious activity (including load-related inquiries from strangers) to their supervisors immediately.

Drivers are expected to take all reasonable and responsible precautions to prevent damage to company vehicles and theft of hazardous material(s) cargo while in transit.

For personal protection and safety, and the security of the cargo, drivers are expected to park in safe, well lit, designated truck parking locations only (such as reputable truck stops or high-traffic, major rest areas). When possible, trailers loaded with hazardous materials should be parked against a wall, fence, or other stationary/fixed object to enhance cargo security.

In all cases, drivers are required to inspect their vehicle and trailer for evidence of tampering after each stop.

Drivers shall lock their vehicles at all times while in transit – especially during all time spent in urban areas, and parked at truck stops and rest areas.

When possible, dispatch shall contact receivers for the purpose of arranging secure overnight or after hours parking for drivers who can safely and legally arrive at their destinations ahead of schedule.

Drivers are **prohibited** from taking equipment (loaded or empty) to or through home, or parking in any unsecured area. Drivers failing to abide by this policy are subject to disciplinary action up to and including termination of employment.

Drivers are expected to maintain regular communications with E.E.F.I. while in transit. Any incident of drivers failing to check in when required shall be assumed by the company to be suspicious and highly irregular. Immediate action shall be taken in such situations. Drivers are expected to fully understand this procedure and make every effort to maintain regular contact and communication with dispatch.

4.1.3 Hijack or Cargo Theft Driver Guidelines

Drivers who fall victim to vehicle hijackers or cargo thieves are instructed to notify local police as soon as possible. Once the proper authorities have been notified, drivers are required to contact an appropriate company official and follow all subsequent instructions.

HAZARDOUS MATERIALS SECURITY PLAN

Drivers are prohibited from picking up and transporting any unauthorized person.

In the event of an attempted vehicle hijacking or cargo theft situation while the vehicle is in motion, E.E.F.I. has adopted a NO STOP policy. Drivers who believe a vehicle hijacking is, or may be, in progress, are instructed to keep the vehicle moving as safely and responsibly as possible until the attempt has ceased and/or the authorities have notified. However, in any hijack situation, drivers should use their own good judgment (whether to stop or keep moving) based on the degree to which they feel personal safety is at risk. Nothing our drivers do is worth getting hurt over.

4.1.4 Stop Off/Destination Driver Security Procedures

Upon arrival at the destination or stop off, drivers shall check in with the responsible receiving person(s) to notify them of arrival and follow the receiver's unloading instructions, and obey all customer plant safety and security rules and procedures.

Once permission to unload has been given, the driver shall proceed to the unloading location (assigned receiving dock door) and secure the vehicle. No company vehicle shall be left unattended until the driver is satisfied that the vehicle is secure from moving.

Drivers shall supervise the unloading process. In the event of cargo damage, overage, shortage, or any other discrepancy, drivers shall contact their supervisor immediately for instructions and to report the discrepancy.

After the unloading process has been completed, the driver shall get the appropriate paperwork signed by the responsible receiving employee, and contact dispatch for the next assignment or instructions.

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ACKNOWLEDGEMENT FORM

I acknowledge I have been informed, and given a copy, of the company's Hazardous Materials Security Plan. I have read and understand the procedures contained therein, and I accept the policy as a working document that I will support and follow in my daily work.

Employee's Signature	Date:
Supervisor's Signature	Date:
QA/RC Coordinator's Signature:	Date:

HAZARDOUS MATERIALS SECURITY PLAN

ATTACHMENT A

Exterior Security Inspection Form

Date: _____

Time: _____

Inspector Signature: _____

	Observation	Work Order #
Fences		
Gates		
Exterior Doors		
Security Signs		
Exterior Lighting		
Windows		
Other Entryways		

Comments: _____

