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Subject: SPILL PREVENTION CONTROL & COUNTERMEASURE PLAN.			

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Thursday, January 16, 2003

CLIFF BERRY, INC.

Spill Prevention Control & Countermeasure Plan

and

Contingency Plan and Emergency Procedures

MIAMI FACILITY

**3033 Northwest North River Drive
Miami, Florida 33142**

Location:

Latitude: 25° 47' 48" North

Longitude: 80° 14' 42" West

Telephone Numbers:

Miami Facility (305) 638-2030

24 Hr Emergency Response (800) 899-7745

Fort Lauderdale Office (954) 763-3390

Mailing Address:

Post Office Box 13079

Port Everglades Station

Fort Lauderdale, FL 33316

Responsible Person:

Cliff Berry, II

President and QI

RECEIVED

FEB 15 2002

DEPT OF ENV PROTECTION
WEST PALM BEACH

RECEIVED
RCRA

JAN 16 2003

Hazardous Waste Regulation

**MIAMI FACILITY
SPCC AND CONTINGENCY PLAN
DISTRIBUTION LIST**

PLAN NO.	ENTITY
1	Florida Department of Environmental Protection (FDEP)
2	Miami-Dade Department of Environmental Resources Management (DERM)
3	Miami-Dade County Police Department
4	Miami-Dade County Fire Department
5	UM/Jackson Memorial Medical Center
6	Miami Facility Copy
7	Larry Doyle (CBI)
8	Bill Parkes (CBI)

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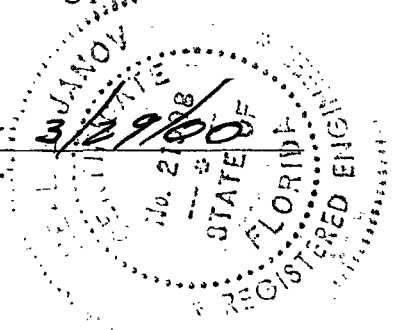
- 15. Inclement Weather**
 - ◆ Inclement Weather and Natural Disaster
 - ◆ Preparations for Hurricanes

CERTIFICATION OF SPCC PLAN

CERTIFICATION

I hereby certify and attest that I am familiar with this facility and the information contained in this plan; that to the best of my knowledge and belief such information is true, complete and accurate. Also, the plan submitted has been prepared in accordance with good engineering practices.

NEAL D. JANOV 
Name, Signature & Seal of Professional Engineer



Approval

The Spill Prevention Control and Countermeasure Plan (SPCCP) is hereby approved for implementation.

Clifford Berry, II
Name of Responsible Officer

President
Title of Responsible Officer


Signature of Responsible Officer

INTRODUCTION

The Miami Facility is owned and operated by Cliff Berry, Inc. It is located at: 25° 47' 48", North Latitude and 80° 14' 42" West Longitude. The facility has a local address of 3033 N.W. North River Drive, Miami, FL 33142.

The person in charge of the facility is Cliff Berry, II. He can be reached twenty-four (24) hours a day at 1-800-899-7745. The facility may be operated twenty-four (24) hours a day seven (7) days a week as needed.

The facility is fully permitted and licensed to handle the following:

- a. Oily wastewater pre-treatment processing and discharge to POTW
- b. Used oil transfer and processing
- c. Oil filters transfer and processing
- d. Non hazardous solid waste transfer and bulking
- e. Hazardous waste transfer (maximum 10 days)

The site of this facility, which covers 3.4 acres, is shown in Figure No. 1 (one line sketch). The terrain is relatively flat throughout. Also, construction details are shown in Figure No. 1.

The Miami Facility has incorporated secondary containment in all areas where during normal operations there is a reasonable potential for an oily wastewater spill. Areas contained are:

Horizontal Tank Farm, Receiving Tanks, Vertical Tank Farm, Oily Wastewater Pretreatment System, Truck Rack, Hose Rack, Warehouse Contaminated Materials Storage Area (Drums), Rail Car Siding, Mixing Tank, Pipe Gallery and Used Oil Filter Crushing Operation.

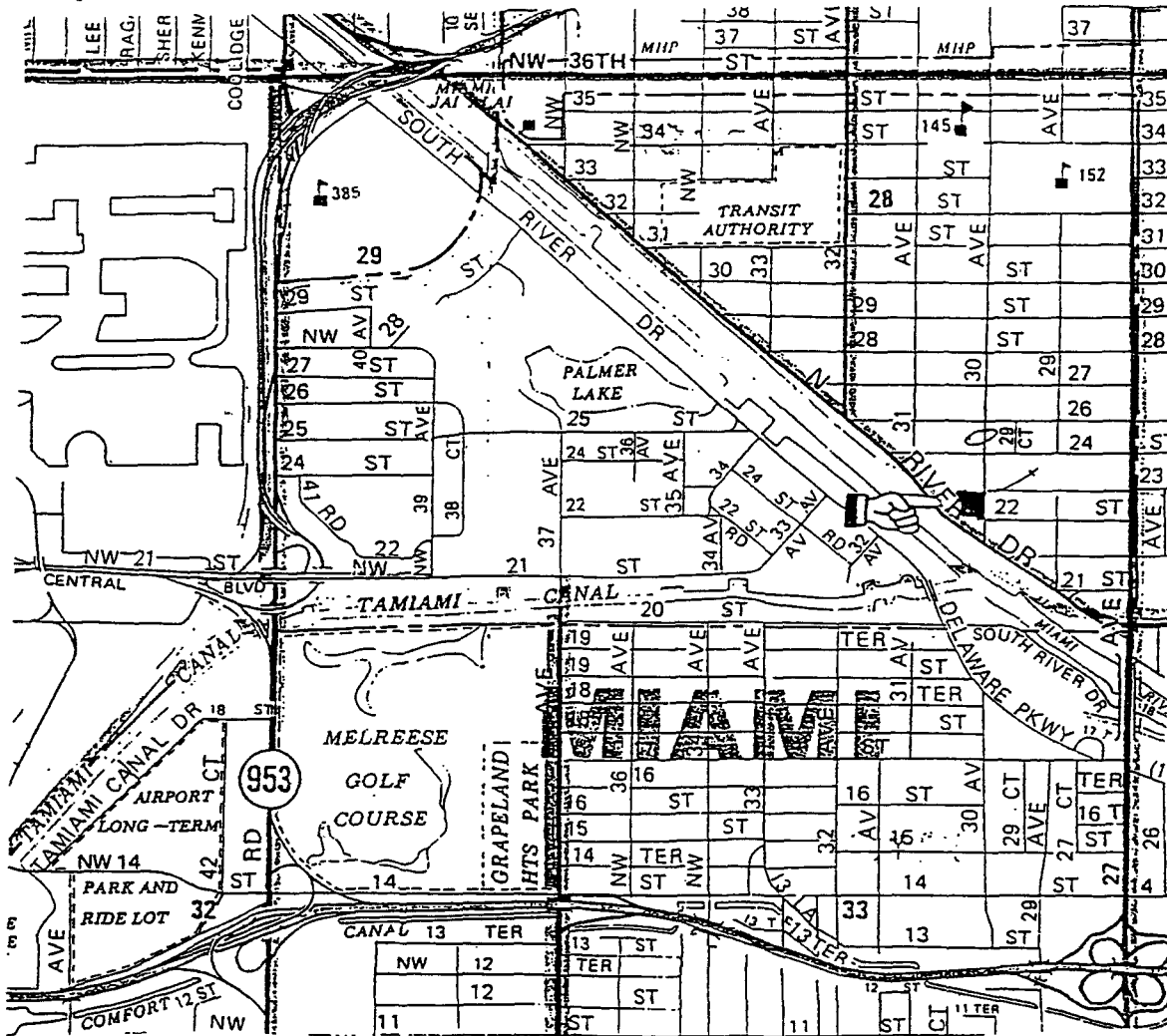
Details of tank size and contents are shown in Table 1.

During normal operations, all products are received/shipped via trucks or railroad cars.

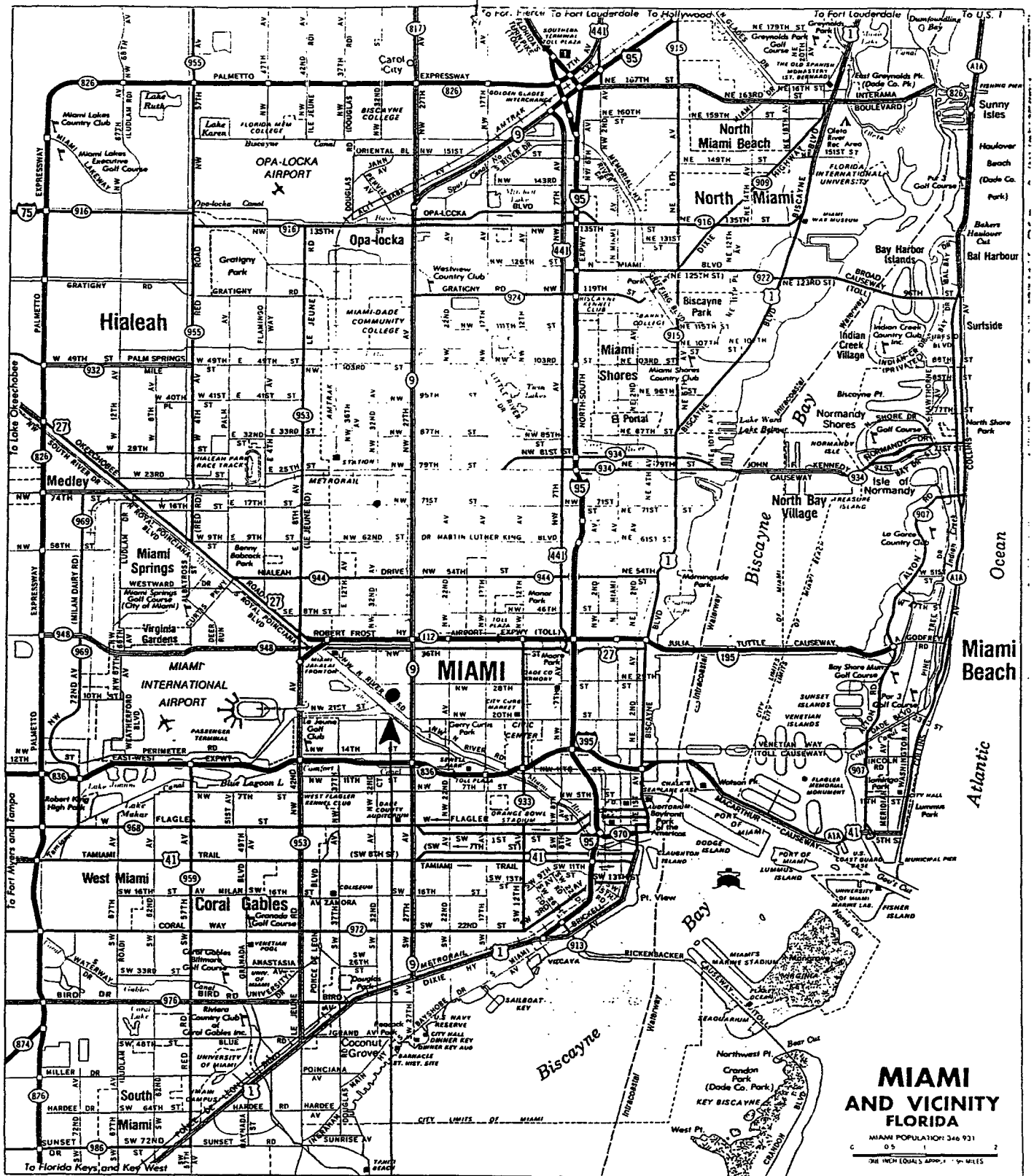


Cliff Berry, Incorporated
Environmental Services

33CFR 154.310 (a) (1) - Geographic Location of the Miami Facility:



CBI
Miami
Collection & Processing Facility
3033 N.W. North River Drive
Miami, FL. 33142



MIAMI AND VICINITY FLORIDA

MIAMI POPULATION 346,931
 C 05 1 2
 THE METROPOLITAN AREA - 1990

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 N
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 P

1 2 3

SITE

**Table #1
Vertical Tanks**

Tank #	Date Installed	Size (Gallons)	Material of Construction	Products
01 (AG)	1946	126,000	Steel	Used Oil
02 (AG)	1946	126,000	Steel	Used Oil
03 (AG)	1946	126,000	Steel	Oily Water
04 (AG)	1946	126,000	Steel	Oily Water
05 (AG)	1946	210,000	Steel	Oily Water
06 (AG)	1946	126,000	Steel	Oily Water
07 (AG)	1946	126,000	Steel	Used Oil

Horizontal Tanks

Tank #	Date Installed	Size (Gallons)	Material of Construction	Products
08 (AG)	1965	20,100	Steel	Treated Water Effluent
09 (AG)	1965	20,100	Steel	Treated Water Effluent
10 (AG)	1965	19,000	Steel	Oily Water
11 (AG)	1965	19,000	Steel	Oily Water
12 (AG)	1965	19,500	Steel	Oily Water
13 (AG)	1965	19,500	Steel	Oily Water
14 (AG)	1965	19,500	Steel	Oily Water
15 (AG)	1965	19,500	Steel	Oily Water
16 (AG)	1965	17,600	Steel	Oily Water
17 (AG)	1965	17,400	Steel	Oily Water
18 (AG)	1965	17,400	Steel	Oily Water

19 (AG)	1965	17,400	Steel	Oily Water
20 (AG)	1965	17,600	Steel	Used Oil
21 (AG)	1965	17,600	Steel	Used Oil
22 (AG)	2000	25,000	Steel	Used Oil
23 (AG)	2000	25,000	Steel	Used Oil
24 (AG)	2000	25,000	Steel	Used Oil
25 (AG)	2000	25,000	Steel	Used Oil

Vertical Tanks

26 (AG)	2000	5,000	Steel	Used Oil
Vertical Tank (mixing AG)	1965	4,000	Steel	Used for mixing Products

Receiving Tanks

Tank #	Date Installed	Size (Gallons)	Material of Construction	Products
Receiving Tank #1	1995	5,000	Steel	Oily Waste Water
Receiving Tank #2	1995	5,000	Steel	Used Oil
Receiving Tank #3	1995	5,000	Steel	Oily Waste Water

DCES

SCALE: N.T.S.
DATE: 3-29-00
DWN. BY: M.K.
CHK. BY: H.B.J.
P.B. PG.

JOB NO.:
732-98

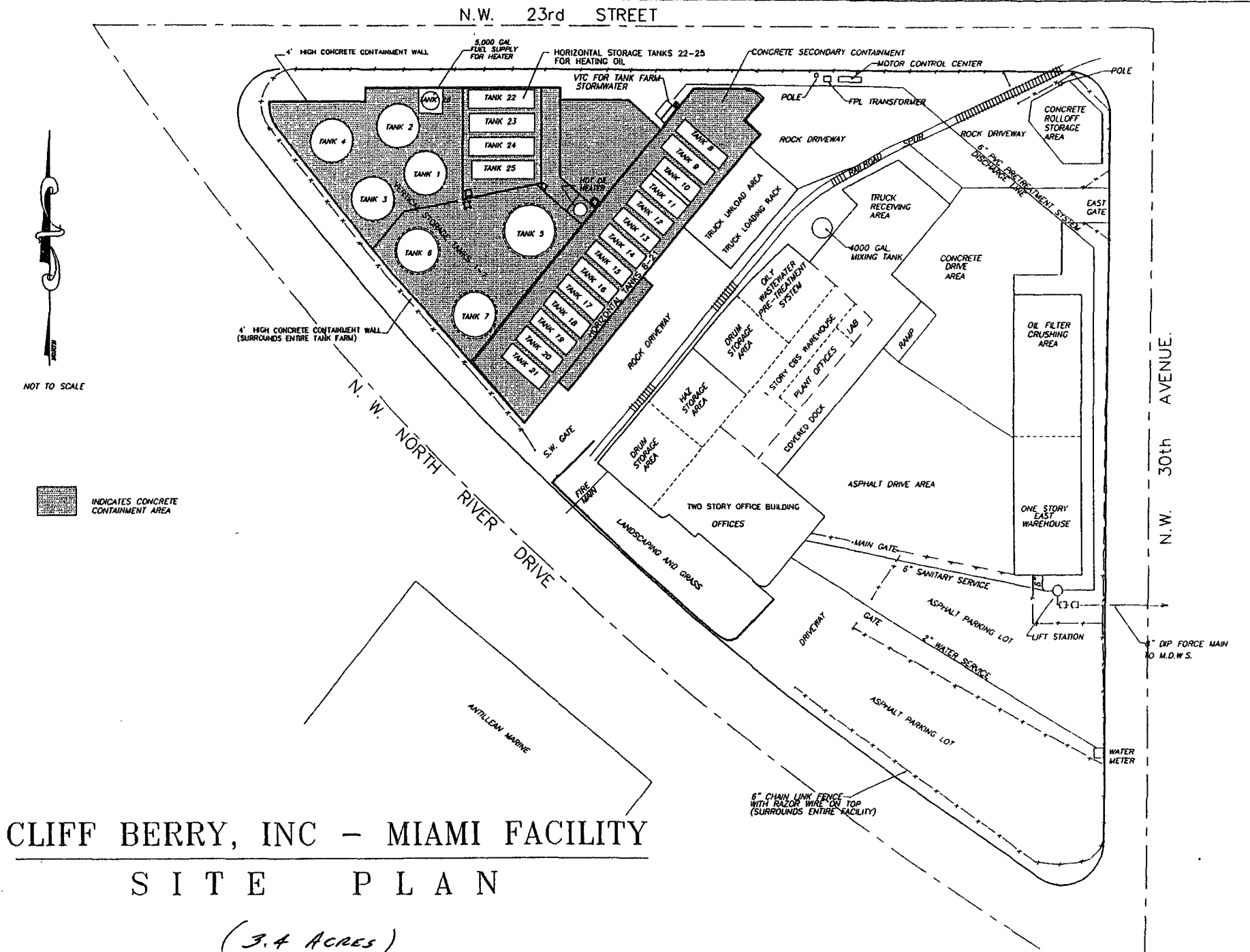
SHEET: 1 OF 1

CLIFF BERRY INC.
MIAMI FACILITY
MIAMI, FLORIDA
SITE PLAN

REVISIONS	DATE	BY	CHK.

Figure No. 1

DIVERSIFIED CONSTRUCTION
DCES
 & ENGINEERING SERVICES
 2847 N. ANDREWS AVENUE FORT LAUDERDALE FL 33311
 954 564-9774 EB 86499 FAX 954 564-9758



CLIFF BERRY, INC - MIAMI FACILITY

S I T E P L A N

(3.4 ACRES)

2A. Spill Events:

This facility was originally constructed in 1946 and previous spill events are as follows:

No spill events have taken place at the facility in the past twelve (12) months.

2B. Prediction of Spill Behavior:

- (a) A spill from any of the bulk storage tanks would be contained in the diked area.
- (b) Any spill from drums stored in the warehouse, would be contained in the concrete curbed area and pumped out for reclaim and/or disposal in an approved site.

2C. Bulk Storage Tanks:

The materials and design of the bulk storage tanks are compatible with the product they hold. A tank integrity inspection will be made of each tank daily and records will be kept of results of inspections in logbooks. All aboveground tanks, their foundations and supports will be visually inspected daily during routine operations. Each aboveground storage tank's contents are measured manually, checked for overfill protection each time the tank is filled. Records of contents are maintained on site. Also, gaskets, pumps, lines, etc. are inspected daily by personnel. Any leakages are reported and recorded.

2D. Inspection Records:

Inspection, their frequency and records are maintained as follows:

Inspection/Test	Frequency	Record
Tank integrity (visual)	Daily	Yes
Tank supports & foundations (visual)	Daily	Yes
Liquid sensing device's	Daily	Yes
Above ground valves, pipe & fittings (visual)	Daily	Yes
Corrective Actions	As Required	Yes

2E. Monitoring Wells:

Figure II Shows location of monitoring wells.

Figure III Shows location of soil borings.

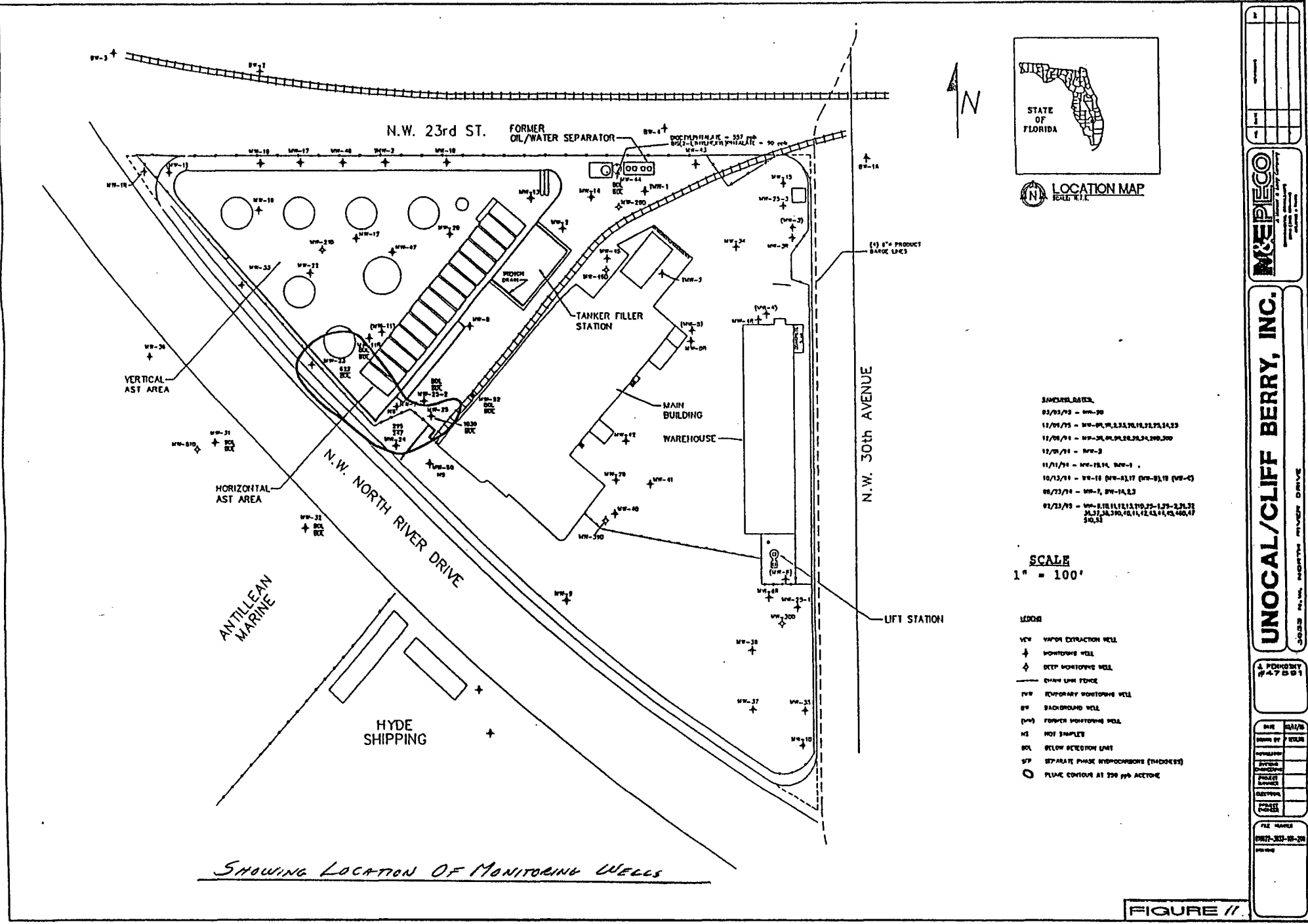
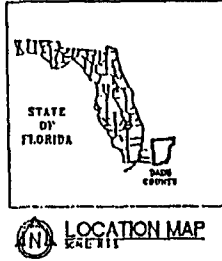
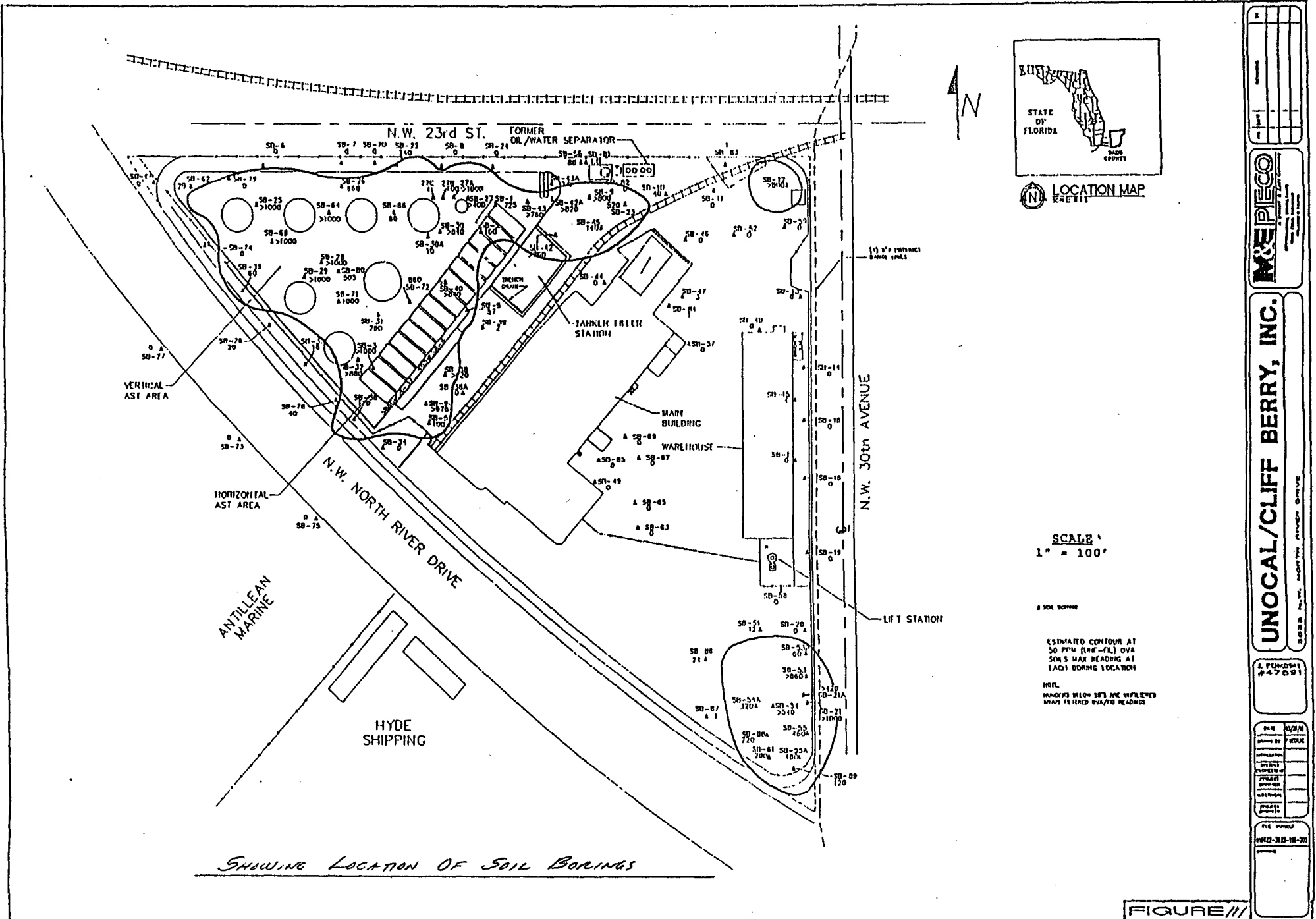


FIGURE //



LOCATION MAP
SCALE 1" = 100'

SCALE
1" = 100'

A SOIL BORING

ESTIMATED CONTOUR AT
50 PPM (LRF-1L) OVA
SOILS MAX READING AT
EACH BORING LOCATION

NOTE:
READINGS BELOW SETS ARE REFLECTED
VALUES AS USED IN DATA READINGS

SHOWING LOCATION OF SOIL BORINGS

NO.	
DATE	
BY	
CHECKED	
APPROVED	



UNOCAL/CLIFF BERRY, INC.
1000 N.W. 30th Ave.
Ft. Lauderdale, FL 33309

2. FISHKOSKI
4-4-7-0-91

DATE	BY	CHKD BY

FILE NUMBER
PMZ-212-18-20

FIGURE //

OILY WASTE WATER AND USED OIL STORAGE TANK FARM

On Shore Storage Tank Farm & Truck Loading Facility

Cliff Berry, Inc.'s oily waste water and used oil storage tank farm and truck loading facility is located at 3033 N.W. North River Drive, Miami, FL 33142. Cliff Berry, Inc.'s mailing address is P.O. Box 13079, Port Everglades Station, Ft. Lauderdale, FL 33316.

All aboveground storage tanks in the vertical and horizontal tank farms have been individually inspected and repaired where applicable and evaluated for their suitability to store the oily waste water and used oil from a materials and construction point of view. In addition, containment for the vertical and horizontal storage tank facilities have been designed to contain the contents for the largest tank plus ten percent (10%). There are no below ground storage tanks at the Miami Facility and there are no bypass valves used in any system that would allow an inadvertent spill outside the storage tank containment facilities.

3A. Dikes, Berms or Retaining Walls Sufficiently Impervious to Contain Spilled Oil:

Cliff Berry, Inc.'s oily waste water and used oil vertical and horizontal tank farm is contained by a concrete wall ranging in height from 36" to 48" and by 8" in thickness; secondary containment is provided by 5 inches thick impervious concrete slab located within the concrete containment wall. Eighteen storage tanks are horizontally situated on steel stands anchored to a concrete pad within the retaining wall. Eight vertical storage tanks are anchored to concrete slabs within the retaining wall. A drum storage area is located in the warehouse. The concrete curbing around the drum storage area is 3 inches high and situated on an impervious concrete slab in the warehouse. A concrete containment curb and slab are also under the mixing tank.

3B. Curbing:

A concrete slab is also located outside the tank farm, in the truck unloading area, there is a second concrete slab located in the truck loading rack area. Both slabs have a slight curb to it in order to prevent run off of spilled material (minimal spills).

3C. Culverting, Gutters or Other Drainage Systems; Sumps:

The tank farm has several concrete impervious sumps which are located inside the retaining walls. Should a spill occur, the sumps would be used to catch spilled materials.

3D. Spill Diversion Ponds:

Cliff Berry, Inc. has no spill diversion ponds at this facility.

3E. Retention Ponds:

Cliff Berry, Inc. has no spill retention ponds at this facility.

3F. Sorbent Materials:

Note: see equipment and sorbent list.

3G. Spill and Rainwater Disposal:

Cliff Berry, Inc. maintains a fleet of vacuum and pump trucks as well as mobile fractanks and also tanker trailers. Should a spill occur at our facility this equipment would be used for recovery, storage and transportation of spilled material to an approved disposal site.

Rainwater in the tank farm containment areas is visually checked for any sheen or contamination. If clean, the water is pumped out of the containment areas through an oil water separator to the french drain system located on the property for disposal as per our DERM permit.

3H. All storage tanks, foundations and structural supports will be visually inspected by operating personnel as a part of everyday operations. Upon the first indication of any degradation the necessary and appropriate action will be taken to correct the problem. Records of visual inspections will be maintained both at the facility and communicated to line management for review and incorporation in the operating files.

3I. Consideration has been given to "Fail Safe" operation where applicable. The receiving tanks (atmospheric storage) are equipped with high-level sensors that are engineered to sound an alarm prior to inadvertently overflowing during discharges from tanker trucks. During transfer operations personnel will physically monitor levels in applicable tanks and be equipped with radios to communicate level status to plant operators. Level sensors and communication equipment will be tested periodically and repaired as required. Spare parts in sufficient quantity will be maintained as recommended by the manufactures.

3J. Operators of vehicles entering the facility will have been trained in safe vehicle operation and have experience at other similar operating tank farms facilities. Warning signs will be posted where appropriate. There is minimum probability of damage to aboveground piping. Operators will be trained in loading/unloading procedures to preclude spills and containment has been provided in this area.

3K. The facility is fully fenced and gates are locked during off hours. Operations personnel are maintained in an On-Call status in the event they are needed to respond to any condition requiring their response.

3L. Storage Tanks and Piping Inspection:

All storage tanks, piping, joints, valve glands and bodies, pipeline supports, metal surfaces and other aboveground equipment and facilities for holding oil and water will be visually checked by each employee as they pursue their daily work. Any and all discrepancies will be reported immediately to the supervisor. Additionally, an entry will be made in the record of any discrepancy and the corrective action taken.

A DETAILED AND SPECIFIC VISUAL CHECK OF THE ENTIRE FACILITY INCLUDING MONITORING WELLS WILL BE MADE ON THE FIRST WORKING DAY OF EACH MONTH. RECORDS OF THESE INSPECTIONS WILL BE MAINTAINED ON-SITE AND AVAILABLE TO DERM'S STAFF.

3M. Hazardous Waste Transfer Facility (62-730.171):

Cliff Berry, Inc. operates a Hazardous Waste Transfer Facility at 3033 N.W. North River Dr., Miami Florida (FLD058560699). Containers of hazardous waste are held in transit at the facility for at least twenty-four (24) hours but no longer than ten (10) days.

Containers of hazardous waste are stored in two locations on the facility grounds. Drums are stored in secondary containment in the section labeled as *Secured Hazmat Storage* on the attached facility diagram. Incompatible wastes are segregated in accordance to 40CFR265.177(c). Additionally drums are stored in trucks loaded in accordance with DOT regulations {40CFR263.10}.

All hazardous waste entering the Hazardous Waste Transfer Facility section are recorded in a log maintained at the facility. The log contains the following information: generators name, address, EPA Identification Number, manifest number, date received, and date shipped off site (see attached log).

All containers of hazardous waste received at the facility are inspected daily during hours of operation. If a container is found to be defective or leaking the contents are transferred or over packed into a new container. All spill cleanup material is collected and disposed of in accordance with all local, state, and federal regulations.

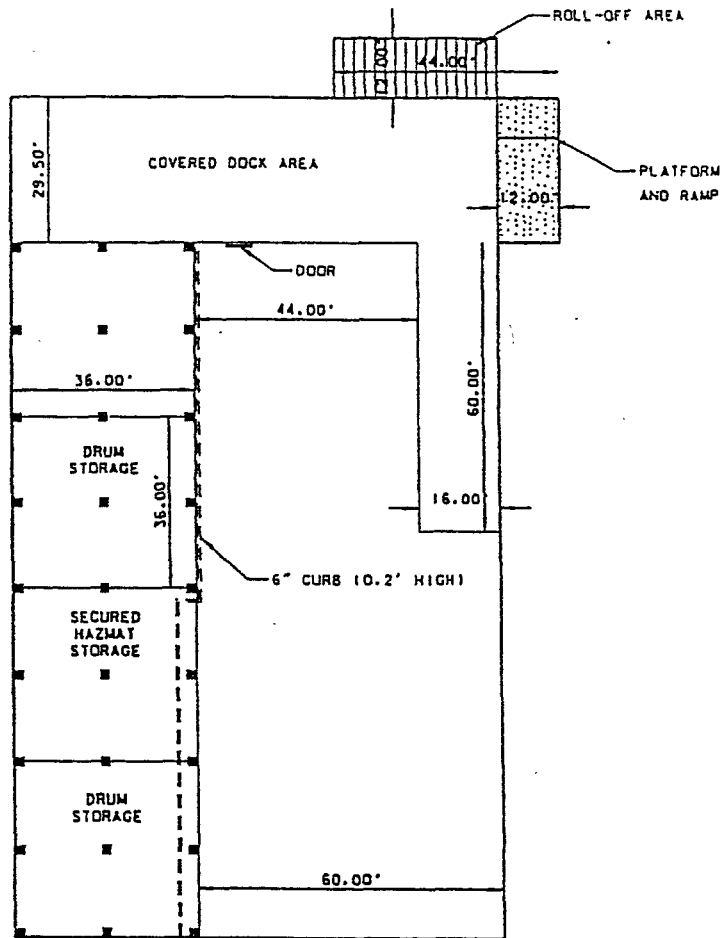


CARNAHAN · PROCTOR · CROSS, INC.

CONSULTING ENGINEERS · SURVEYORS · PLANNERS

8101 WEST ATLANTIC BOULEVARD, MARGATE, FLORIDA 33063

PHONE: 954-972-3959 FAX: 954-972-4178 E-MAIL: margate@carnahan-proctor.com



JOB NO. 990402	DWG BY: HD	SCALE: 1"=40'	MIAMI-DASH FACILITY SQ. ID WASTE CONTROL AREA
CLIFF BARRY INC.	CK'D BY: DMA	DATE: APRIL, 1999	SHEET 1 OF 1 SHEETS

FILE: F:\990402\wd02bsh.dgn
DATE: 22-Apr-99 09:25

SECURITY AT FACILITY

The Cliff Berry, Inc. facility is fully fenced and the entrance gates are locked when the plant is not in use or unattended. The Miami-Dade County Police Department patrols the facility twenty four (24) hours a day, seven days a week.

Facility lighting is maintained and changes made where applicable to enhance visibility during hours of darkness for discovery of spills and to prevent spills by acts of vandalism.

SPILL RESPONSE

Should a spill happen at Cliff Berry, Inc.'s facility the qualified individual (Primary Emergency Coordinator) or alternate qualified individual (Back up Emergency Coordinator) will initiate the following: (see page 9.3 for contact information).

5A. Emergency Spill Response Procedure

Immediate steps for drivers and facility technicians:

- ◆ Stay with the vehicle until help arrives
- ◆ Use emergency numbers in spill plan to contact line management
- ◆ Keep the public away
- ◆ Dike off or use boom to keep liquids from entering sewers, storm sewers or water ways, follow emergency plans for further containment

5B. Emergency Response Plan

This practical emergency response plan is designed to provide a guide to appropriate actions in the event of a spill. The most important is to remain calm and try to get the situation under control as soon as possible.

- ◆ Do not panic, remain calm. If you or anyone else is hurt or incapacitated, call for medical assistance.
- ◆ Evaluate the degree of contamination to the facility and estimate the number of gallons spilled.
- ◆ Pump liquid back into one of the standby storage tanks.

Do your best to dike ahead of the spill to prevent oil from entering sewers and water ways.

5C: Spill Containment Procedures:

Spills on pavement:

Call for booms and pads in amounts' appropriate for the spill. Use booms to contain spill by wiping them in a circular motion. Use vac to skim to remove oil. If spill is too large for booms;

- ◆ Call for sorbents and sand, and contain spreading oil by using sand or Oil Dri to circle the spill.
- ◆ Call for vac truck, visqueen and backhoe. Remove oil-soaked sand and place on plastic visqueen and cover sand with additional visqueen to prevent rain from spreading oil. Stream or power flush pavement or concrete to remove residue.

Spills on Soil:

Call for earth moving equipment (loader, backhoe, dump truck) and sand. Determine direction of oil flow and excavate an area for the oil to flow into. Around the spill contain oil with sand berm. Pump liquid oils to truck. Prepare a plastic tarp and sand berm on an area of clean ground. Remove oil soaked soil to visqueen while making sure that soil is contained by visqueen and berm. Have backhoe remove one foot below the surface of spill, or until visually clean. Call for further assistance to remove soil for treatment. Also, use OVA meter and analysis to determine further removal.

Remove Oil Soaked Sorbent Material:

Place oil used sorbent material in double, heavy gauge plastic bags. Management will have these picked up and legally disposed of at an appropriate facility. Do not make bags heavier than approximately 40 pounds each.

SECURITY ON SPILLS

During a large oil spill when thousands of dollars of clean up equipment is in use or stored at various locations throughout the clean up area, one must establish security over this equipment during the very early stages of the spill. Some of the steps that can be taken to reduce theft and vandalism are shown in the checklist below:

Checklist

- ◆ Contact a security company to provide guards where equipment is being stored or maintained. Make sure these guards can communicate with the Command Center at all times.
- ◆ Contact a fence company to provide fenced security areas for equipment.
- ◆ Local police departments can help in providing security, with off duty officers.
- ◆ Establish equipment and clothing distribution areas so personnel and equipment can be checked in and out.
- ◆ To ensure secure operations provide guards, toilet, and waste disposal facilities in decontamination and food serving areas.
- ◆ Establish First Aid kits or First Aid facilities throughout the clean up area. Consider hiring off duty nurses to attend to general first aid treatment cases. They would also be qualified to determine when and if a person required additional or more intense medical treatment.
- ◆ Provide lighting for security, decontamination, and equipment storage areas. Make sure that cleanup contractors and other involved personnel are provided adequate lighting at night.
- ◆ Issue temporary identification badges to all personnel involved in the cleanup operation. Insure custody control procedures are established for I.D. badges, so they will not fall into the wrong hands.
- ◆ As soon as possible, establish a claims office to handle the daily complaints for shoreline damage, boat damages, and many other claims which are made during the spill. This claims office should be near the spill site, but NOT near the Command Center.
- ◆ Establish a "Right Away" person who can make arrangements to access private property to support the clean up.
- ◆ Establish sign out and return procedures for tools and consumables.

- ◆ Assign a key person to monitor all contractor activities regarding people, equipment in use, and hourly accounting
- ◆ Assign security personnel to report safety infractions in the work place directly to the OSC at the Command Center.

Note: It is very important that adequate communications equipment is readily available for security and related operations.

MATERIALS

SPC OIL SORBENT	SIZE		QUANTITY
SPC 100 Pads	17" x 19" x 3/8"	100 Pads/Bale	40
SPC 200 Pads	17' x 19" x 3/16"	200 Pads/Bale	120
SPC 50 Pads	34" x 38" x 3/8"	50 Pads/Bale	40
SPC 810 Boom	10' x 8"	4 Boom/Bale	70
SPC 510 Boom	10' x 5'	4 Boom/Bale	50
SPC 5510 Boom	10' x 5" (DBL Boom)	4 Boom/Bale	5
SPC 10 Pillow	14" x 25"	10 Pillows/Bale	15
SPC 1900 Sweep	17" x 100'	1 Sweep/Bale	80
SPC 150 Blanket	38" x 144' x 3/8"	1 Blanket/Bale	20
SPC 152 Blanket	19" x 144' x 3/8"	2 Blankets/Bale	10
SPC 27 Particulate		1 Bag/Bale	5

SORBENT INDUSTRIAL RUG & SUPER SIR			
Sir 36 Rug	36" x 300'	1 Rug/Bale	10
Sir 18 Rug	18" x 300'	2 Rugs/Bale	15
Sir 001 Pads	18" x 18"	100 Pads/Bale	10

COBRA COIL			
CC 400 Coils	3" x 48" Long	12 Coils/ Box	15

SPC UNIVERSAL PLUS			
Description			Quantity
UN 915 pillows 9" x 15"	16 pillows/bag	1 bag/case	10
Oil Snare			25 boxes
Plastic sheeting 20' x 100'			5 rolls
Plastic bags			2000 bags

Description	Quantity	
Steel overpack drums	10	drums
Poly overpack drums	5	drums
55 gallon Open Head Drums (DOT approved)	50	drums
Coveralls - Tyvek	100	suits
Coveralls - Saranyx	50	suits
Respirator cartridges	100	sets
Rubber boots (heavy duty)	50	pairs
Rubber gloves (heavy duty)	200	pairs
Water soluble industrial cleaning fluid	55	gallon
Industrial solvent	55	gallon
Industrial scrub brushes	15	
Industrial squeegees	10	
Dip nets (spill equipment)	30	
Tyvek hoods	100	
Clear PVC booties	25	pairs

CLIFF BERRY, INC.

EQUIPMENT LIST

DESCRIPTION

QUANTITY

BOATS & BARGES

ALUM. UTILITY BOAT W/MOTOR 14'	2
ALUM. WORK BOATS W/MOTOR 30,40 & 15HP	4
FIBERGLASS WORK BOAT W/MOTOR 20'	1
LANDING CRAFT - 36'	1
PONTOON BOAT W/MOTOR 85 HP	1

HEAVY EQUIPMENT

BACKHOE/FRONTEND LOADER (COMBO)	1
BOBCAT LOADER	1
BULLDOZER	1
DRUM GRABBER	1
FRONTEND LOADER	2
TRACKHOE	1

LIGHT EQUIPMENT

AIR COMPRESSOR	3
AIR COMPRESSOR W/TRAILER	1
AIR FILLING STATION	1
ATV'S	3
BLOWERS , PORTABLE GAS POWERED	2
BOOM ANCHORS	20
BUOYS, LIGHTED	25
CHAIN SAW	4
COMBUSTIBLE OXYGEN, TOXILOGOLY METER	1
CONTAINMENT BOOM (24", 18" & 12")	10,000'
CUTTING SAW, GAS POWERED	1

DESCRIPTION

QUANTITY

LIGHT EQUIPMENT

DBL DIAPHRAM PUMP 1"	2
DBL DIAPHRAM PUMP 2"	1
DBL DIAPHRAM TRANSFER PUMP 3"	3
FASTANK - 250 GAL	1
FRAC TANK - 20,000 GAL	2
GENERATOR 15KW	1
GENERATOR 3,000 WATT	1
GENERATOR 4,000 WATT	2
GENERATOR 400 WATT	1
GENERATOR 5,000 WATT	1
HOSE 2"	200'
HOSE 3"	200'
HOT WATER PRESSURE CLEANER	3
HYDRAULIC POWER PACKS	2
JACK HAMMER & BIT	1
LIGHT TOWER UNIT	8
OIL MOP SKIMMER	1
OVA METER	1
PORTABLE CUTTING TORCH	1
PORTABLE WELDER	1
PRESSURE CLEANER	2
PUMPS, SUBMERSIBLE 6"	2
RADIO, PORTABLE TWO WAY VHF	10
RED DEVIL BLOWER & HOSE	1
ROLLOFF CONTAINER (20 YDS)	4
ROLLOFF CONTAINER (40 YD)	1
ROPE	1,000'
SCOTT AIR PACK	3
SCOTT AIRLINE CASCADE SYS W/SKA PAK	8
SHOVELS , ROUND POINT	20
SHOVELS , SQUARE POINT	20
SHOVELS, POLY	5

DESCRIPTION

QUANTITY

LIGHT EQUIPMENT

SKID TANK	5
SKIMMER (MADUSO) 2,000 GAL	1
SKIMMER (WEIR) 1,000 GAL	1
SLOAN PUMP 4"	1
STAGING TENT (20'X20')	1
TOOL SET, NON SPARKING	1
WELDER 4 CYCLE (MILLER)	2
WHEELBARROWS	10
YARD RAKES	10

VEHICLES

BOX TRUCKS	2
BUCKET TRUCK (50')	1
CRANE TRUCKS (2 TON)	2
DUMP TRUCK	1
EMERGENCY RESPONSE TRAILER (18'-20')	2
EMERGENCY RESPONSE TRAILER (40' MOBILE)	3
EMERGENCY RESPONSE VAN	2
FLATBED TRAILERS	3
INDUSTRIAL VACUUM UNIT W/ CYCLONE DRUM LOADER	1
MOBILE COMMAND UNIT	2
PUMP TRUCKS	2
ROLLOFF TRUCK	1
SMALL VEHICLES (CARS, 2W DR TRUCKS ETC.)	6
TANK TRAILERS	3
TRACTORS FOR TRAILERS	5
VACUUM TRUCKS (2,500 - 3,600 GAL)	5

PERSONNEL TRAINING AND DRILLS

Operating personnel will be instructed in the proper operation and maintenance of equipment to prevent the discharge of oil and applicable pollution control rules and regulations.

Operating personnel will receive spill prevention briefings at intervals frequent enough to assure adequate understanding of this SPCC Plan.

The training of all appropriate personnel in the prompt and effective response to an oil spill incident is an important aspect of Cliff Berry, Inc.'s (CBI) oil spill preparedness. Training is intended to assure that all personnel clearly understand the contents of this plan and their respective roles. Personnel also receive periodic familiarization training on the plan and training commensurate with their responsibilities to prepare them in carrying out their job responsibilities in a prompt and efficient fashion.

Since CBI also offers a contract service of twenty four (24) hour oil spill response, all personnel receive invaluable on the job training responding to real spill events. This practical application of oil spill mitigation techniques supplements the OSHA mandated HAZWOPER training.

In addition to the above training, CBI has elected to implement the National Preparedness' for Response Exercise Program (PREP) to satisfy exercise requirements under the Oil Pollution Act of 1990 (OPA-90). The PREP is a unified, federal effort which incorporates the exercise requirements of the U.S. Coast Guard (USCG), the Environmental Protection Agency (EPA) and the Research and Special Programs Administration (RSPA) Office of Pipeline Safety under the Department of Transportation.

The following two pages outline the training and drill plans for CBI.

CBI PERSONNEL TRAINING REQUIREMENTS

ON AND OFF SITE EMERGENCY EVENT (by 29 CFR 1910.120)	POST-EMERGENCY CLEANUP (OFF-SITE)
<p style="text-align: center;">TRAINING IS DEPENDENT UPON RESPONSIBILITIES AND THE LEVEL OF RESPONSE</p> <p style="text-align: center;">1. First Responder Operations Level 29 CFR 1920.120 (q) (6) (ii)</p> <p>Personnel who respond to releases or potential releases of hazardous substances as part of the initial response to the site for the purpose of protecting nearby persons, property, or the environment from the effects of the release are trained to respond in a defensive fashion without actually trying to stop the release. Their function is to contain the release from a safe distance, keep it from spreading and prevent exposures.</p> <p>These personnel receive at least eight hours of training or have had sufficient experience to objectively demonstrate competencies as outlined in 29 CFR 1910.20(q) (6) (iii) (A)-(F).</p> <p style="text-align: center;">2. Hazardous Materials Technician 29 CFR 1920.120 (q)(6)(ii)</p> <p>Personnel who respond to releases or potential releases for the purpose of stopping the release assume a more aggressive role than a first responder at the operations level in that they approach the point of release in order to plug, patch or otherwise stop the release of a hazardous substance.</p> <p>Personnel responding to an emergency off site receive at least 24 hours of training equal to the first responder operations level and have additional competencies as outlined 29 CFR 1910.20(q) (6) (iii) (A)-(I)</p> <p style="text-align: center;">3. Hazardous Material Specialist 29 CFR 1920.120(q)(6)(iv)</p> <p>Personnel who respond with and provide support to hazardous material technicians have a more specific knowledge of the various substances they may be called upon to contain. They receive at least 24 hours or training equal to the technician level and have additional competencies as outlined in 29 CFR 1920.120 (q)(6)(iv)(A)-(I)</p> <p style="text-align: center;">4. On Scene Incident Commander 29 CFR 1910.120 (q)(6)(V)</p> <p>Personnel receive at least 24 hours of training equal to the first responder operations level and have additional competencies as outlined in 29 CFR 1920.120(q)(6)(v)(A)-(F).</p> <p style="text-align: center;">5. Refresher Training 229 CFR 1910.120(q)(8)(I)</p> <p>Personnel who are trained in accordance with paragraph (q)(6) shall receive annual refresher training of sufficient content and duration to maintain their competencies, or shall demonstrate competency in those areas at least yearly.</p>	<p style="text-align: center;">Personnel Osha Instruction CPL-2-2.5(11/05/99)</p> <p>Minimum of 4 hours for job duties with low magnitude of risk.</p> <p style="text-align: center;">29 CFR 1910.120(c)(3)</p> <p>For a high magnitude of risk job, 40 hours of initial training and three days of supervised field experience under the direct supervision of a trained, experienced supervisor. Annual 8 hour refresher training.</p> <p>For a limited task or fully characterized area worker, 24 hours of initial instruction and the minimum of one day actual field experience under the direct supervision of a trained, experienced supervisor. Annual 8 hours of refresher training.</p> <p style="text-align: center;">2. Management and Supervisor 29 CFR 1910.120(e)(4)</p> <p>40 hours of initial training, three days of supervised field experience and at least eight additional hours of specialized training at the time of job assignment on such topics as, but not limited to the employer's safety and health program and the associated employee training program.</p> <p style="text-align: center;">3. Refresher Training</p> <p>Personnel specified in (c)(1) and (c)(4) above shall receive 8 hours of refresher training annually and any critiques of incidents that have occurred in the past year that can serve as training examples of related work, and other relevant topics.</p> <p style="text-align: center;">4. Equivalent Training (29) CFR 1910.120(e)(9)</p> <p>Employers who can show by documentation or certification that an employee's work experience and/or training has resulted in training equivalent to the training required in 1 & 2 above, shall not be required to prove the initial training requirements. Employer shall provide a copy of the certification or documentation the employee upon request.</p> <hr style="border: 1px solid black;"/> <p style="text-align: center;">POST-EMERGENCY ON SITE</p> <hr style="border: 1px solid black;"/> <p style="text-align: center;">1. Site Employees, Management and Supervision 29 CFR 1910.120 (q)-(11)-(iii)</p> <p>Employees are trained according to the requirements of 29 CFR 1910.38(a) emergency action plan; 1910.134 respiratory protection; 1910.1200 hazard communication and other appropriate safety and health training made necessary by the tasks that they are expected to perform</p> <p style="text-align: center;">2. Refresher Training 29 CFR 1910.38 (a)(5)(iii)(A)-(C)</p> <p>Emergency plan training is required initially when the plan is developed, whenever the employee's responsibilities or designated actions under the plan change, or whenever the plan is changed.</p> <p style="text-align: center;">29 CFR 1910.1200(h)</p> <p>Employers shall provide employees with information and training on hazardous chemicals in their work area at the time of initial assignment, and whenever a new hazard is introduced into their work area.</p>

**OPA 90
PREP TRIENNIAL DRILL SCHEDULE**

Triennial Drills must include the following exercises:

TERMINAL AND PIPELINE DRILLS

DRILL TYPE	FREQUENCY	DRILLS/3 YR. PERIOD	AGENCY	INITIATING AUTHORITY
Q1 Notification	Quarterly	12	USEPA, USCG RSPA	Facility Response Team/OSRO (6)
Response Team Notification	Quarterly	12 (5)	RSPA	Facility Response Team/OSRO
Equipment Deployment	Semi-Annual	6 (1)	USEPA, USCG	Facility Response Team/OSRO
Exercise Entire Response Plan	All Components Every 3 years	1	USEPA, USCG RSPA	Facility Response Team/OSRO

CORPORATE RESPONSE TEAM DRILLS

Table Top Exercise	Annual	3 (3.4)	USEPA, USCG	Corporate Team/OSRO
Equipment Deployment	Annual	3 (4)	USEPA, USCG	Corporate Team/OSRO
Exercise Entire Response Plan	All components Every 3 years	1	USEPA, USCG RSPA	Corporate Team/OSRO

AGENCY INITIATED DRILLS

DRILL TYPE	FREQUENCY	ADVANCED NOTICE	INITIATING AUTHORITY	RESPONSE TEAM AFFECTED
Unannounced Tabletop Exercise	When Announced	10 Days Prior	RSPA	Corp and/or Facility Team/OSRO
Unannounced Equipment Deployment	When Announced	None	USEPA, USCG	Facility/Team OSRO
Area Exercise	When Announced	20 (2)	USEPA, USCG	Facility and/or Corporate Team/OSRO

1. Three Drills must be announced.
2. 20 exercises total nationwide per year.
3. One drill must include a worst case discharge scenario.
4. Must have six months minimum lapse between exercises
5. Notification of response team applies to Facility Response Team or Prearranged Response Contractors.
6. OSRO = Oil Spill Removal Organization
 USEPA = Environmental Protection Agency
 USCG = United States Coast Guard
 RSPA = Research and Special Programs Administration

FACILITY EMERGENCY RESPONSE PLAN

Name of Facility: Miami Facility
Type of Facility: Oily Wastewater Processing Facility
Location of Facility: 3033 N.W. North River Drive
Miami, FL 33142

Name and Address of Owner or Operator:

Name: Cliff Berry, Inc.
Address: P.O. box 13079
Ft. Lauderdale, FL 33316

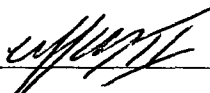
Person accountable for spill prevention, emergency procedures, reporting and employee training:

Name: Cliff Berry, II
Title: President

MANAGEMENT APPROVAL

The individuals designated as Emergency Coordinators in the absence of the emergency coordinator are authorized to commit the resources needed to carry out this plan.

Signature



Name: Cliff Berry, II
Title: President

Review and Update

This contingency plan will be reviewed, and immediately amended, if necessary, whenever:

1. Applicable regulations are revised;
2. The plan fails in an emergency;
3. The facility changes in its design, construction, operation, maintenance, or other circumstances- in a way that materially increases the potential for fires, explosions, or releases of used oil, or changes the response necessary in an emergency;
4. The list of emergency coordinators changes;
5. The list of emergency equipment changes.

Emergency Response Arrangements

1. Fire Department: Miami Dade Fire Department
Copy of contingency plan: (see next page)
Emergency Response Arrangements: _____

2. Police Department: Miami Dade Police Department
Copy of a contingency plan: (see next page)
Emergency Response Arrangements: _____

3. Hospital: UM/Jackson Memorial Medical Center
Copy of a contingency plan: (see next page)
Emergency Response Arrangements: _____

4. Emergency Response Contractor: Cliff Berry, Inc.



ENVIRONMENTAL RESOURCES MANAGEMENT
WATER AND SEWER DIVISION
33 S.W. 2nd AVENUE
SUITE 500
MIAMI, FLORIDA 33130-1540
(305) 372-6500

January 29, 1997

William E. Parkes, Jr.
Cliff Berry, Inc.
3033 N.W. North River Drive
Miami, Florida 33142

RE: Spill Prevention Control and Countermeasures Plan and Contingency Plan.

The Department of Environmental Resources Management received a copy of the updated SPCCP and Contingency plan on January 29, 1997. The submitted document will be reviewed for approval.

SINCERELY,

A handwritten signature in cursive script, appearing to read "Julian Hope".

Julian Hope
Wastewater Section

cc: Fernando Bestard
Roy Patrick

Metropolitan Dade County, Florida
Fire Rescue Department
6000 S.W. 87th Avenue
Miami, Florida 33173-1698
(305) 596-8600



February 19, 1997

Mr. William E. Parkes, Jr.
Miami Facility Manager
Cliff Berry, Inc.
Environmental Services
P.O. Box 13079
Port Everglades Station
Fort Lauderdale, FL 33166

Dear Mr. Parkes:

This is to acknowledge the receipt of your Facilities' Spill Control and Emergency Plan. I will review this valuable information with the firefighters at my fire station and then forward the plans to our Hazardous Materials Response Team.

We thank you for your interest in promoting a good working relationship between your employees and the Fire Department.

Sincerely,

A handwritten signature in cursive script that reads "Bill Gustin".

Bill Gustin, Captain
Fire Station 2
6460 N.W. 27th Avenue
Miami, FL 33127
(305) 836-1766

Always Ready, Proud to Serve

Northside Station



FAX COVER SHEET

Confidential requires immediate pick up

TO: Bill Portes

PHONE: _____

FAX: 638-2030

FROM: Officer Gilbert

PHONE: (305) _____

FAX: (305) 693-7704

SUBJECT: CBI - Contingency Plan/Emergency Proc.

_____ Pages, Including Cover Sheet

REMARKS: _____

The information contained in this facsimile message is CONFIDENTIAL information intended only for the use of the individual or entity named above. If the reader of this message is not the intended recipient, you are hereby notified that any dissemination, distribution or copy of this communication is strictly PROHIBITED and will be considered as a tortious interference in our confidential business relationships. Additionally, unauthorized dissemination of this confidential information subjects you to criminal and civil penalties. If you have received this communication in error, please immediately notify us by telephone and return the original message to us at the above address via the U.S. Postal Service. Thank you.

CBI

Cliff Berry, Inc.

Spill Prevention Control & Countermeasurement Plan

And

Contingency Plan and Emergency Procedures

Miami Terminal Facility



JACKSON MEMORIAL HOSPITAL

1611 N.W. 12th AVENUE MIAMI, FLORIDA 33136-1094

February 12, 1997

William E. Parkes, Jr.
Miami Facility Manager
Cliff Berry, Incorporated (CBI)
P.O. Box 13079
Port Everglades Station
Ft. Lauderdale, FL 33316

RE: CBI-Spill Prevention Control & Countermeasurement
Plan and Contingency Plan-Emergency Procedures-
Miami Terminal Facility

Mr. Parkes:

This is to acknowledge receipt of the CBI procedure manual revised November 1996 which you provided to our office 2/5/97.

Pursuant to our recent telephone conversation, please be advised that with respect to Section 9: Facility Emergency Response Plan and Section 14: Medical Emergency, at this time Jackson Memorial Hospital is not equipped to receive/handle persons who may be chemically contaminated-including flammable and organic products. As this service limitation changes, we will notify the appropriate emergency response agencies.

Should you have any questions of this communication, please advise by calling our office at (305)585-2582.

Thank you for your attention.

Sincerely,

Richard Williams
Safety Manager
Risk Management-Env. Health & Safety

RW/ho

cc: Gerard Kaiser, MD, Sr.V.P. Medical Affairs
George Hill, Administrator, Risk Management
Francisco Fuentes, Safety Officer, Risk Management
Ron Bogue, Administrator, Engineering Services
Jeff Katz, Assistant Admin., Emergency Care Center
John E. Mitchell, Dade County Fire & Rescue Depart.
Physical Plant Life Safety Sub-Committee
File

Emergency Coordinators

1. Primary Emergency Coordinator

Name: Cliff Berry, II
Title: President
Address: 738 N.E. 16th Ave.
Ft. Lauderdale, FL 33304
Phone: Office (954) 763-3390 or (954) 763-5455
Home: (954) 525-3810
Beeper: (954) 307-4881
Mobile: (954) 325-7392

2. Back Up Emergency Coordinator

Name: Phillip Pierre-Louis
Title: Facility Manager
Address: 17714 S.W. 19th Street
Miramar, FL 33029
Phone: Office: (954) 763-3390 or (954) 763-5455
Home: (954) 433-8039
Beeper: (954) 244-9689
Mobile: (954) 410-9572

3. Back Up Emergency Coordinator

Name: Dean Sullivan
Title: Plant Operations Supervisor
Address: 862 N.W. 89th Avenue
Plantation, FL 33324
Phone: Office: (954) 763-3390 or (954) 763-5455
Home: (954) 747-6700
Beeper: (954) 307-8219
Mobile: (954) 410-0628

Miami Facility Fax Number: (305) 638-0610

Emergency Procedure - Responsibilities of the Emergency Coordinator or Designee

1. Activate the Miami Facility alarm/communication system to notify all facility personnel by:
 - a. Announce the emergency situation over the plant PA system (press intercom 89).
 - b. Also, notify facility personnel by word of mouth.

2. Notify appropriate State or Local Agencies with designated response roles if their help is needed. In the case of fire or explosion:
 - a. Pull fire alarm pull switch for plant alarm system (found inside front doors of plant operation office). This will notify plant personnel as well as notify the alarm company.
 - b. Call 911 to notify fire department.

3. Identify the character, exact-source, amount and extent of any released materials. This may be done by observation, review of facility records and/or chemical analysis.

4. Assess possible hazards to human health or the environment that may result from the release, fire, or explosion. This assessment must consider both direct and indirect effects of the release, fire or explosion. If assessment indicates that evacuation of local areas may be advisable, immediately notify appropriate local authorities. Be available to help local authorities decide whether local areas should be evacuated.

5. Notify immediately the government official designated as the on scene coordinator of the National Response Center using their twenty-four (24) hour toll free number (800) 424-8802.

The report must include:

 - a. Name and telephone number of person reporting;
 - b. Name and address of facility;
 - c. Time and type of incident (release, fire, etc.);
 - d. Name and quantity of material(s) involved;
 - e. The extent of injuries, if any;
 - f. The possible hazards to human health, or the environment, outside the facility.

6. Take all reasonable actions necessary to ensure that releases, fires and explosions do not occur, recur, or spread to other used oil or waste at the facility.

7. After the emergency is over, provide for the recycling, storing or disposal of recovered materials or materials that result from a release, fire or explosion. In the affected area(s) of the facility make sure that no waste or used oil that may be incompatible with the released material is recycled, treated, stored or disposed of until cleanup procedures are

completed. All emergency equipment listed in the contingency plan need to be cleaned and fit for its intended use before operations are resumed.

8. Notify the Regional Administrator and appropriate State and Local Authorities that the facility is in compliance with 40 CFR part 279.52 before resuming operations in the affected area(s) of the facility.
9. Note in the operating record the time, date and detail of any incident that requires implementing the contingency plan.
10. Submit a written report within fifteen (15) days after the incident to the Regional Administrator. The report must include:
 - a. Name, address, and telephone number of the owner or operator;
 - b. Name, address and telephone number of the facility;
 - c. Date, time, and type of incident (release fire, etc.);
 - d. Name and quantity of materials involved;
 - e. The extent of injuries, if any;
 - f. An assessment of actual or potential hazards to human health or the environment, where applicable;
 - g. Estimated quantity and disposition of recovered material that resulted from the incident.

Requirements for Notification

1. Name and telephone number of person making notification.
2. Name and address of the facility.
3. Type and time of incident.
4. Name and quantity of materials involved.
5. The extent of injuries if any.
6. The possible hazards to human health, or the environment, outside the facility.
7. The name and telephone number of the person or persons to be contacted for more information. List on page 9.3.
8. Wait for the other party to hang up, do not hang up first.

Emergency Contact Phone Numbers

1. Fire (Miami Dade County Fire Department) 911
2. Police (Miami Dade County Police Department) 911
3. Ambulance 911
4. Nearest Emergency Medical Facility
 Keisler Occupational Medical Services
 1025 E. 25th Street, Hialeah, FL 33013 (305) 585-6901
5. Nearest Hospital
 UM/Jackson Memorial Medical Center
 1611 N.W. 12th Avenue, Miami, FL
 Emergency Care Center (305) 585-6901
6. National Response Center (800) 424-8802
7. Federal - U.S. EPA, Region IV (404) 562-8357
8. State -Florida DEP (561) 681-6673
 Emergency Response (800) 320-0519
9. Local -DERM (305) 372-6789
10. Chemtrec (800) 424-9300
11. U.S. Coast Guard (305) 535-8705

GENERAL RESPONSIBILITIES

Personnel Assignments

- A. Coordination (Emergency Coordinator)
 - 1. Cliff Berry, II (Leader)
 - 2. Phillip Pierre-Louis (Back UP)
 - 3. Dean Sullivan (Back UP)

- B. Communication
 - 1. Phillip Pierre-Louis (Leader)
 - 2. Cliff Berry, II (Back Up)
 - 3. Dean Sullivan (Back Up)

- C. Evacuation
 - 1. Dean Sullivan (Leader-plant)
 - 2. Dean Sullivan (Leader office)
 - 3. Julio Espailat (Back up for 1)
 - 4. Julio Espailat (Back up for 2)

- D. Emergency Situation
 - 1. Emergency Assessment
 - Cliff Berry, II (Leader)
 - Phillip Pierre-Louis (Back Up)
 - Dean Sullivan (Back Up)

 - 2. Spill Containment
 - Cliff Berry, II (Leader)
 - Phillip Pierre-Louis (Back Up)
 - Dean Sullivan (Back Up)

- E. Emergency Team
 - 1. Fire Fighting Dean Sullivan and Joel Blanco
 - 2. Spill Containment Dean Sullivan and Joel Blanco

- F. First Aid
 - 1. Dean Sullivan
 - 2. Julio Espailat

Description of Personnel Assignments

- A. Emergency Coordinator: Assess all possible hazards for severity. Responds to, coordinates and aids in Remediation of all hazards. Coordinates all evacuation and return to normal operation. In the event that the communication leader is out of the office the coordinator's first backup becomes the communication leader.
- B. Communication Leader: Responsible for informing the office and plant personnel of hazards. Informs the evacuation leaders of need to evacuate. Informs the main office of the situation. Handles media communication. In the event that the coordinator is out of the office, then the communication leader becomes the coordinator.
- C. Evacuation: Responsible for guiding personnel to staging area. Makes sure that all personnel are out of the office in an evacuation. Assist's coordinator in his tasks. Conducts head count at the staging area.
- D. First Aid: Responsible for cardio pulmonary resuscitation and first aid to the other employees in case of accidents.

FIRE RESPONSE

Fire Control Systems and Equipment

1. The Miami Facility has a PA system for internal communication capable of giving immediate emergency instruction to facility personnel.
2. All plant operation personnel have 2-way radios so that they are in constant communication with each other at all times.
3. The facility is equipped with a fire alarm system consisting of an emergency pull switch located in the operations office. This pull switch activates the local plant alarms as well as the security company. The facility fire alarm system pull switch is monitored twenty four (24) hours a day by ADT security company. ADT 24 hour operations center phone number is (305) 377-4541. The location code is 34-14-411.
4. Fire Control Equipment consist of :
 - a. Numerous fire extinguishers are locating around the plant. They are inspected and certified (tagged) on an annual basis. (See figure IV for location of fire extinguishers).
 - b. The main warehouse has a supervised automatic fire sprinkler system which is also monitored twenty-four (24) hours a day by ADT security company. (See phone number and location code above) the fire sprinkler system is inspected, tested and certified on an annual basis. (See next page for inspection/test report).
5. Water for the fire sprinkler system comes in on a separate fire main and adequate volume and pressure is available at all times.

Emergency Procedures

Fire

1. Upon initial sighting, activate fire alarm system. If fire is in its incipient stage, respond with extinguishers.
2. Immediately alert emergency coordinator by word of mouth.
3. Emergency coordinator will assess danger and will initiate response to fire, shutdown procedure, and/or evacuation.
4. All nonessential personnel should evacuate as soon as the alarm sounds. Once off the property, Antillean Marine will be used as a communication center.

Emergency personnel will be given the following information:
(See notification Page 9.4 & 9.5)

5. If trapped by a fire in area:
 - a. Close all doors between you and the fire.
 - b. Seal all door cracks and vents the best you can.
 - c. Use the telephone to call the fire department and give your situation.
 - d. Sit on the floor calmly as far away as possible from the fire.

Emergency Evacuation

- Upon encountering a fire or smoke, immediately alert the coordinator, sound the alarm and commence evacuating the plant and office areas.
- Depending on the location of the emergency, personnel should evacuate via the front or rear of the building and proceed to the southeast corner of the main parking lot for the head count. Do not stay near any of the buildings.
- CBI management, under direct orders from the fire chief, will permit re-entry into the building after resetting the fire alarm. At that time the emergency coordinator will instruct CBI personnel and all tenants to return to their offices.

Shutdown of Operation

- Shut down all pumps.
- Close man ways, and access ports to tanks and railcars.
- Close all valves.
- Remove vehicles from site if it can be done safely.
- Shut down power to product movement areas.
- Close warehouse doors after confirming employees have evacuated.
- Open perimeter access gate for emergency crews.
- Move fire extinguishers to the location for the emergency crews.
- All nonessential personnel are to evacuate the premises immediately. Personnel should report to the southeast corner of the front parking lot so they can be accounted for.

- Plant personnel will provide security for site until emergency crews arrive.
- **UNDER NO CIRCUMSTANCE IS ANYONE TO ENDANGER THEMSELVES IN ORDER TO PROTECT EQUIPMENT AND/OR PRODUCT. IF YOU ARE IN DOUBT SACRIFICE THE EQUIPMENT AND/OR THE PRODUCT.**

Fire and Explosion

- Do not attempt to fight a fire unless you have been trained to do so.
- If a fire is too large or the first attempt to extinguish it is unsuccessful, do not attempt a second try - EVACUATE.
- Attempts at fire fighting should only be made during the fires incipient stage.
 1. Only hand held portable extinguishers will be used by company employees when responding to fires. No hose lines will be used by company employees.
 2. Company employees will not attempt to extinguish any large fires or small fires with the potential to change rapidly.
 - a. Pump seal fires on a pressurized system
 - b. Ground fire in excess of 100 square feet in a congested process area.

EXPLOSION RESPONSE

Bomb Threat Procedure

- I. Purpose
To provide for the orderly gathering of information during a potentially stressful situation.
- II. Responsibility
Anyone receiving a bomb threat has the responsibility to gather as much information as possible and report the facts to plant management. Use the attached checklist.
- III. Safety
Remain calm. This will allow the maximum amount of information to be exchanged. Do not antagonize the other party.

The caller may have definite knowledge or believes that an explosive or incendiary device has been or will be placed. They want to minimize personal injury or property damage. They may, or may not, be the person who placed the device. The caller wants to create an atmosphere of anxiety and panic. This could result in a disruption of the normal activities at the facility.

- IV. Procedure
Handling the Call

- a. Try to keep the caller on the line and make notes.
- b. Get specific information on what is going to happen.
 1. When will it go off?
 2. Where is it placed?
 3. What does it look like? Describe it.
 4. When was it put there?
 5. How do you know about this?
 6. Ask caller to repeat information.
- c. Notice as much about the caller as possible.
 1. Ask for their name.
 2. Age.
 3. Sex.
 4. Mental condition - joking, angry, etc.
 5. General condition - drunk, on drugs, etc.
 6. Voice characteristics - accent, speech defects.
 7. Ethnic origin.
- d. What background noises are present? - trucks, music, etc.

- e. Immediately notify the emergency coordinator.
 1. If the threat is considered genuine, the emergency coordinator will notify the local police. Dial 911
 2. Shut down and evacuate the plant. Refer to the evacuation procedure on page 11.2.
 3. If there is time, organize a search with a minimum of employees. Stop the search and evacuate thirty (30) minutes prior to scheduled detonation.

Search - Overt Type

Potential bombs have no standard appearance. Be alert for any boxed (cardboard, metal or wood), suitcases, cans sections of pipe or other objects which appear out of place.

- a. Begin the search around the outside of each building and work in. The employees most familiar with a building should search that building.
- b. Inside buildings begin along the outside walls and work to the center. Ground floors first and upper levels following.
- c. Start with easily accessible places.
- d. Look for recently disturbed items or items out of place.
- e. Any suspicious objects should be reported to the person in charge. **DO NOT HANDLE OR DISTURB ANY SUSPECTED BOMB.** Write on a piece of paper any information that would identify the suspicious object, i.e., size and type of container, and exact location. Also, note the route of egress from the object.
- f. If one suspected bomb is located, continue the search, if it appears reasonably safe, until completed. More than one may have been set.
- g. Open all doors and windows in the building and evacuate to a minimum of 300 feet.
- h. The employee in charge and the person receiving the call should meet the police when they arrive. Tell the police the exact location of any suspicious objects and the egress routes from the object.
- i. In the event of detonation, activate the emergency response plan.
- j. Do not return to the building or location until the all clear is received.

Publicity

- a. All persons involved in the incident should be encouraged to keep the incident confidential.
- b. All inquires from the public news media should be handled by the communication leader.

If the communication leader is not available, take a number and state that a return call will be made.

Bomb Threat Call Checklist

Questions To Ask

Exact Wording of Threat

- 1. When is bomb going to explode? _____
- 2. Where is it right now? _____
- 3. What does it look like? _____
- 4. What kind of bomb is it? _____
- 6. Did you place the bomb? _____
- 7. Why? _____
- 8. What is your address? _____
- 9. What is your name? _____

Sex of caller _____ Age _____ Race _____ Length of call _____

Caller's Voice:

- | | | | |
|----------------------------------|-----------------------------------|---|--|
| <input type="checkbox"/> Calm | <input type="checkbox"/> Nasal | <input type="checkbox"/> Loud | <input type="checkbox"/> Deep Breathing |
| <input type="checkbox"/> Angry | <input type="checkbox"/> Laughing | <input type="checkbox"/> Lisp | <input type="checkbox"/> Clearing throat |
| <input type="checkbox"/> Excited | <input type="checkbox"/> Crying | <input type="checkbox"/> Raspy | <input type="checkbox"/> Disguised |
| <input type="checkbox"/> Slow | <input type="checkbox"/> Normal | <input type="checkbox"/> Deep | <input type="checkbox"/> Accent |
| <input type="checkbox"/> Rapid | <input type="checkbox"/> Distinct | <input type="checkbox"/> Ragged | <input type="checkbox"/> Familiar |
| <input type="checkbox"/> Soft | <input type="checkbox"/> Slurred | <input type="checkbox"/> Cracking Voice | <input type="checkbox"/> Stutter |

If voice is familiar, who did it sound like? _____

Background Sounds:

- | | |
|--|--|
| <input type="checkbox"/> Street noises | <input type="checkbox"/> Factory machinery |
| <input type="checkbox"/> Crockery | <input type="checkbox"/> Animal noises |
| <input type="checkbox"/> Voices | <input type="checkbox"/> Office machinery |
| <input type="checkbox"/> PA System | <input type="checkbox"/> Static |
| <input type="checkbox"/> House noises | <input type="checkbox"/> Local |
| <input type="checkbox"/> Motor | <input type="checkbox"/> Clear |
| <input type="checkbox"/> Long distance | <input type="checkbox"/> Booth |
| <input type="checkbox"/> Music | <input type="checkbox"/> Other |

Threat Language:

- | | |
|---|-------------------------------------|
| <input type="checkbox"/> Well Spoken (educated) | <input type="checkbox"/> Irrational |
| <input type="checkbox"/> Message read by threat maker | <input type="checkbox"/> Incoherent |
| <input type="checkbox"/> Foul | <input type="checkbox"/> Taped |

Remarks: _____

Report call immediately to _____ Dial 911.

Fill out completely, immediately after bomb threat: Date: _____ Time: _____

Person receiving call _____ Position: _____

Phone number call received on: _____

Phone call taped: Yes No

ALL CLEAR

All Clear Procedure

- The only people allowed to issue the all clear are:

The emergency coordinator

The communicator

- Before an "All Clear" can be issued the following conditions must be met:

No readily apparent dangers to life or health can be present.

If outside emergency response personnel (i.e., fire department, police, etc.) have been involved, they must also give the all clear.

This information will be communicated verbally to the employees.

Once the "all clear" has been given by the local fire chief and police, only then will CBI personnel return to the plant. Entry to the facility will be led by the coordinator with at least one other person in attendance. Minimum safety equipment required is as follows:

Hard Hats
Safety Glasses
Safety Shoes

The following additional equipment may be required depending on what type of emergency transpired.

Cartridge respirators

Vapor detector and/or meter

No access will be permitted to CBI employees if any life support apparatus is required.

It is the responsibility of the coordinator to ensure that all local emergency response personnel has received all the information they require and are adequately prepared to respond again if necessary. It is also the responsibility of the coordinator to insure that the surrounding community is assisted in any deficiencies for which CBI is culpable.

MEDICAL EMERGENCY

Medical Emergency Procedure

- Initial report is to be made to the Plant Manager and/or the Operations Manager.
- An assessment will be made as to the severity of the incident determining if medical assistance is to be called. In general if the employee is unable to walk on his own, he/she is to be kept at the scene while an ambulance is called.
- If the incident does not require an ambulance, the employee is to be transported to the applicable medical facility by supervisory personnel. Details of the incident along with other information, i.e., MSDS are to be provided to medical personnel. The supervisor will remain at said facility until a report on the employee's condition can be obtained.
- Any plant personnel trained in first aid and/or CPR should perform it until relieved by Fire Rescue Personnel.

Fire Rescue 911

Keisler Occupational Medical Services (305) 696-0842
1025 E. 25th Street
Hialeah, FL 33013

Um/Jackson Memorial Medical Center (305) 585-6901
1611 N.W. 12th Avenue
Miami, FL

Rescue

Rescue operations are to be performed by outside emergency personnel whenever possible. CBI personnel will respond to rescue situations only when no outside assistance is available and there is no immediate danger to life and/or health.

All rescues will be directed by the coordinator.

Rescue Criteria

- Rescue is to be attempted when location of the employee is known.
- Rescue will not be attempted when the structure involved is on fire.
- Rescue activities involved with product releases will fall within the parameters of the SPCC Plan.

- No rescue efforts are to be made with less than three employees. One employee is to remain outside the hazard area at all times. If rescue is clearly a medical emergency and no hazardous environment exists, rescue may be attempted by less than three people.
- Communication must be maintained at all times. This is to be accomplished through the use of two-way radios.

INCLEMENT WEATHER

Inclement Weather and Natural Disaster

1. In the event of inclement weather (hurricane, electrical storm, tornado), the emergency coordinator will make the assessment of the danger.
2. If the assessment is severe, the emergency coordinator will notify the communication leader to cancel the work day. If the assessment is not severe, operations may simply be suspended until the storm passes. The emergency coordinator will give a verbal "all clear" to employees once the inclement weather has passed. This covers incidents such as thunder storms and sporadic heavy rains which interfere with safe operations. During these times, shelter will be sought in the plant and offices.
3. If the work day has not started, the communication leader will call the plant personnel and inform them. He will call the main office and inform them.
4. If the workday is already underway, the communication leader will inform the plant to shut down. He will call the main office and inform them.

Natural Disaster

1. As soon as a dangerous situation is assessed, the emergency coordinator will be notified.
2. The emergency coordinator will decide from the severity of the danger whether to remain in the office or to evacuation.
3. If evacuation is necessary, then the emergency coordinator will announce this to the communication leader and/or to the evacuation leaders.
4. The office will evacuate through the evacuation routes. Evacuation will be done in an orderly manner to the southeast corner of the warehouse and everyone will remain in the southeast corner of the warehouse until the danger has passed.
5. If the imminent danger does not permit for evacuation, try to inform the emergency coordinator, search for an inside corner of a wall away from glass windows and product storage and remain there in a sitting position until the danger has passed.

Preparations for Hurricanes

When a hurricane warning is announced for the South Florida area, the following preparations will be made by CBI personnel.

- a. All items which are not securely anchored will be moved into the warehouse. These include empty and full containers, all hoses and fittings, wall mounted extinguisher units, fork lifts, pallets and all other loose objects around the plant.
- b. All empty trailers are to be moved as far away from the building as possible. This includes all bulk trailers, box trailers and drum trailers.
- c. Secure plywood sheets and lag into the walls effectively covering the windows.
- d. Move as much equipment as possible above ground floor level. An ideal height for water sensitive items is five (5) feet.
- e. All mats, antennas, or other high flying apparatus should be dismantled and lowered to ground level. Any removable parts should be placed inside the main building warehouse.
- f. All vertical storage tanks should be filled with at least three (3) feet of product or water to keep the tanks from lifting off their foundations should the stormwater in the secondary containment area rise a couple of feet during storm.