



**Spill Prevention Control &
Countermeasures Plan (SPCC)**

CORPORATE EMERGENCY COORDINATOR

STEVE OBST – 210 Southwest 44th Ave, Plantation, FL 33317
(954) 650-6853 Cell (954) 583-0185 Home

CORPORATE BACK-UP EMERGENCY COORDINATOR

J.P. BLUTEAU – 21261 SAWMILL CT, BOCA RATON FL 33498
(954) 465-0504 Cell (561) 483-6288 Home

RECEIVED

APR 20 2011

**FL DEP
WEST PALM BEACH**

**SPILL PREVENTION CONTROL &
CONUNTERMEASURES PLAN (SPCC)**

AND

CONTINGENCY PLAN & EMERGENCY PROCEDURES

RAIDER ENVIRONMENTAL FACILITY

4103 Northwest 132nd Street

Opa Locka, FL 33054

Location: Latitude: 25-53-41 North Longitude: 80-15-51 West

Telephone Number: (305) 994-9949

24 Hour Emergency Response Number: (954) 605-6853

Mailing Address

4103 Northwest 132nd Street

Opa Locka, FL 33054

RECEIVED

APR 20 2011

**FL DEP
WEST PALM BEACH**

Date of Preparation: January 2011

TABLE OF CONTENTS

	<u>Page</u>
SPCC DISTRIBUTION LIST	1
SPCC PLAN CERTIFICATION	2
SECTION I – INTRODUCTION	1
Figure 1 – Facility Location	5
Table 1 – Tank Sizes and Contents	7
A. Spill Events	9
B. Prediction of Spill Behavior	9
C. Storage Tanks	9
D. Inspection Records	9
SECTION II – OILY WASTEWATER AND USED OIL STORAGE TANK FARM	9
A. Sumps	10
B. Spill Diversion Ponds	10
C. Retention Ponds	10
D. Sorbent Materials	10
E. Spill and Rainwater Disposal	10
F. Visual Inspection	14
G. Safe Vehicle Operation	14
H. Operation On-Call Status	15
I. Daily Inspection	15
SECTION III – SECURITY AT FACILITY	15
SECTION IV – SPILL RESPONSE	15
A. Emergency Spill Response Procedures	15
B. Emergency Response Plan	15
SECTION V – SECURITY AT SPILLS	17
SECTION VI – MATERIALS	17
SECTION VII – PERSONNEL TRAINING AND DRILLS	18
SECTION VII – FACILITY EMERGENCY RESPONSE PLAN	18
A. Review and Update	19

B. Emergency Response Arrangements.....	20
C. Emergency Procedures – Responsibilities of the ER Coordinator	20
D. Requirements for Notification.....	22
E. Emergency Contact Phone Numbers	23
F. Raider Environmental Services, Inc. Emergency Phone List.....	24
 SECTION IX – GENERAL RESPONSIBILITIES.....	 25
A. Personnel Assignments.....	25
B. Emergency Procedures & Actions.....	26

Plan No.	Entity
1	Florida Department of Environmental Protection (FDEP)
2	Miami-Dade Department of Environmental Resources Management (DERM)
3	Opa Locka Police Department
4	Opa Locka Public Works Department
5	Miami-Dade Fire Department
6	Hialeah Hospital
7	Steve Obst – Raider Environmental Services, Inc.
8	JP Bluteau – Raider Environmental Services, Inc.

Spill Prevention Control & Countermeasures Plan

I. Introduction

The Raider Environmental Facility is owned and operated by Raider Environmental Services, Inc. The Facility is located at 25° - 53 - 41 North Latitude and 80° - 15 - 51 West Longitude. The Facility has a local address of 4103 Northwest 132nd Street, Opa Locka, FL 33054.

The person in charge of the Facility is **Steve Obst**. He can be reached twenty-four (24) hours a day at **(954) 605-6853**. The Facility maybe 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. Non-Hazardous Industrial Wastewater Pre-Treatment and Discharge to POTW
- C. Used Oil Transfer and Processing
- D. Used Oil Filters Transfer and Processing
- E. Non-Hazardous Solid Waste Transfer and Bulking

The site of this Facility, which covers 1.22 acres, is shown in **Figure 1**. The terrain is relatively flat throughout.

The Raider Environmental Facility has incorporated secondary containment in all areas where during normal operations there is a reasonable potential for an oily or industrial wastewater spill. Area contained are:

- A. Horizontal and Vertical Tank Farm
- B. Wastewater Pre-Treatment System
- C. Drum Bulking Area

Details of the tank sizes and contents are shown in **Table 1**.

Tank #	Date Installed	Size (Gallons)	Material of Construction	Contents
1	2007	35,000	Carbon Steel	Oily Water (Influent)
2	2007	35,000	Carbon Steel	Oily Water (Influent)
3	2007	35,000	Carbon Steel	Oily Water (Influent)
4	2007	35,000	Carbon Steel	Oily Water (Influent)
5	2007	25,000	Carbon Steel	Used Oil / Oily Water
6	2007	25,000	Carbon Steel	Used Oil / Oily Water
7	2007	25,000	Carbon Steel	Used Oil Processing Tank
8	2007	3,000	Carbon Steel	Heater Fuel (Oil)
9	2007	3,000	Carbon Steel	Used Oil / Oily Water Process Tank
10	2007	3,000	Carbon Steel	Used Oil / Oily Water Process Tank
11	2007	3,000	Carbon Steel	Heater Fuel (Diesel)
12	2007	3,000	Carbon Steel	Carbon Polishing Tank
13	2007	20,000	Fiberglass	Equalization Tank
14	2007	20,000	Fiberglass	Processed Water Tank
15	2007	20,000	Fiberglass	Final Effluent Tank

A. Spill Events

The Raider Environmental Facility was constructed in 2007 and no spill events have taken place at the Facility.

B. Prediction of Spill Behavior

A spill from any of the storage tanks would be contained in the tank farm diked area.

C. Storage Tanks

The materials and design of the storage tanks are compatible with the product they hold. A tank integrity inspection will be made on each tank daily and records will be kept of inspections in the Facility Office. Any leakage is reported and recorded.

D. 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
Tank Integrity (Visual)	Daily	Yes

II. Oily Wastewater and Used Oil Storage Tank Farm

The Raider Environmental Services, Inc., oily water and used oil storage tank farm is located at 4103 Northwest 132nd Street, Opa Locka, FL 33054.

All storage tanks in the tank farm have been individually inspected and repaired where applicable and evaluated for their suitability to store oily waste water and used oil from a materials point of view. In addition, containment for the storage tanks has been designed to contain the contents for the largest plus ten percent

(10%). there are no below ground tanks at the Raider Environmental Facility and there are no bypass valves used in any system that would allow an inadvertent spill outside the storage tank containment facilities.

A. Sumps

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

B. Spill Diversion Ponds

Raider Environmental Services, Inc. does not have any diversion ponds at this Facility.

C. Retention Ponds

Raider Environmental Services, Inc. does not have any retention ponds at this Facility.

D. Sorbent Materials

See Equipment and Sorbent List

E. Spill and Rainwater Disposal

Raider Environmental Services, Inc. maintains a fleet of vacuum and pump trucks as well as mobile frac tanks and 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 are visually checked for any sheen or contamination and then pumped to an oil/water separator.

1. Oil/Water Separator

Oil/water separators are devices commonly used for wastewater discharges. The effluent from oil/water separators is typically discharged to either a sanitary sewer system or a storm sewer. Properly designed, installed and operated, oil/water separators provide a treatment system for handling oily wastewater that prevents the entry of unacceptable levels of contamination to a storm sewer or sanitary sewer.

According to Stoke's Law, a 100-micron diameter oil droplet will rise approximately six (6) inches in water every ten minutes. A 20-micron oil droplet will take over two hours to rise the same distance. Because an oil droplet must rise approximately 48 inches to reach the water surface in a

typical gravity – type oil/water separator, smaller droplets may pass through uncollected. Coalescing (binding together) the smaller oil droplets makes them larger and more buoyant, causing them to rise faster. Coalescing oil/water separators may use inclined plates placed within the separation chamber, which provide only a short vertical distance (1/4") for the small droplets to travel before they encounter a fixed surface. Here they can coalesce with other droplets and continue to rise along the plates to the water's surface. Another coalescing method uses a filter made of oleophilic (oil "loving") fibers such as polypropylene. The fine oil droplets attach to the fibers as the wastewater flows through. As the droplets get larger, they become buoyant enough to detach from the fibers and rise to the surface, where they can be collected.

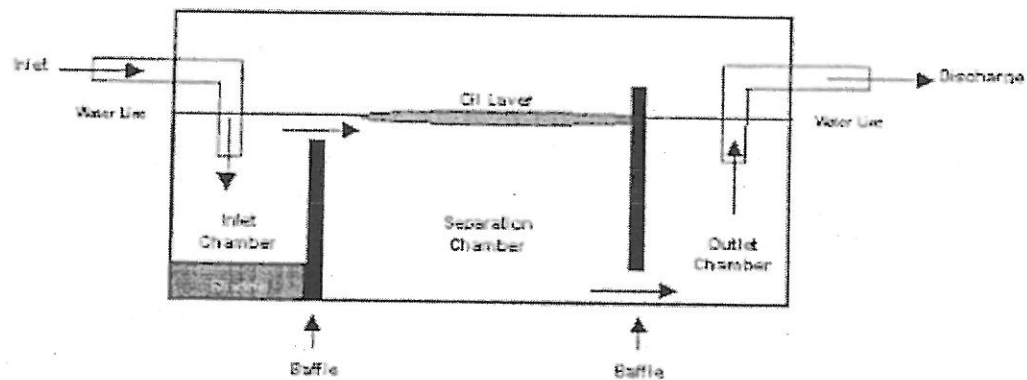


Figure 2. Conceptual Diagram of a Simple Gravity Oil/Water Separator. In a gravity operated OWS, the oil wastewater is introduced through the system inlet. Water turbulence is calmed in the inlet chamber behind the first baffle, where solids settle out and form sludge on the bottom of the chamber. As the wastewater flows over the first baffle to the middle, or separation, chamber, oil droplets rise to surface and are trapped behind a second, higher baffle, which has an opening along its edge. The remaining water passes under the second baffle into the outlet chamber, where it is diverted to a discharge point. Consequently, solid sludge's can be collected from the bottom of the inlet chamber and oil droplets that accumulate at the water's surface in the separation chamber can be skimmed off or otherwise routed to a separate holding tank.

a. Operations and Maintenance

- i. Eliminate unpermitted pollutants and prohibit discharge of wastewater from industrial operations containing hazardous wastes and heavy metals.
- ii. Implement dry cleanup procedures and only use floor drains to carry residual amounts of floating petroleum pollutants. Plug floor drains to oil/water separators that carry industrial wastewater from maintenance shops. Collect, treat and dispose of industrial waste separately.
- iii. Establish a primary office of responsibility (to include the functional organization for the management of pollutants discharged and Civil engineering for maintenance of oil/water separators) which understands and has direct control over respective functions.

-
- iv. Remove and test oil/water separator sludge regularly prior to disposal to ensure compliance with sludge disposal requirements. If sludge is hazardous, take immediate actions to identify and eliminate sources of hazardous pollutants. Dispose of sludge as a hazardous waste and retest wastewater from oil/water separator to assure compliance.

b. **General Considerations**

O/WSs are typically very simple devices. However, several factors that could potentially affect safety, efficiency and proper management must be given careful consideration prior to the installation or modification of any O/WS.

- i. **Flow Rate** – In general, the effectiveness of an O/WS in separating out the oil phase is increased by slower wastewater flow rates into the separator and longer “residence times” (i.e., the period of time that the wastewater remains in the oil/water separator). When the wastewater enters the receiving chamber of the separator, the velocity and turbulence of the fluid is reduced allowing heavier-than-water solids to settle, while larger oil droplets rise to the water’s surface. Further separation continues in the middle chamber (see Figure 2) where smaller droplets of oil rise (more slowly) to the water’s surface and join the larger droplets. The remaining wastewater, once it has passed under the second baffle to the outlet chamber, is discharged (with proper authorization and/or permitting) to a local storm water or sanitary sewer system.
- ii. **Design Capacity** – An O/WS has upper limits to the amounts of oil and sludge that can effectively accumulate while it is in operation. If too much oil accumulates in the receiving and middle chambers, it may flow into the wastewater outlet and end up being discharged to the environment. Proper O/WS design will ensure the separator capacity is sized to meet the needs of the process.
- iii. **Emulsifying Agents** – Detergents and soaps designed to remove oily grime from equipment, weapon systems, vehicles or other components can adversely affect the operation of a gravity O/WS. These types of emulsifying agents are specifically formulated to increase the dispersal of oil into tiny drops in water, which is why they are such good cleaners. When these soapy wastewaters enter the O/WS, it takes significantly longer for the oil to separate, if it can, from the water. Excessive use of detergents can render an O/WS inefficient by completely emulsifying oils into the wastewater stream and allowing it to pass through the system. Low-emulsifying soaps are available that allow oil separation to occur more quickly after the soapy water enters the O/WS. (**NOTE:** Personnel must not use low-emulsifying soaps on weapon system components)

unless they are specifically approved by the weapon system's single manager.)

- iv. **Maintenance Practices** – the ability of oil/water separators to function properly depends upon the timely performance of required service and maintenance. Oil/water separators must be monitored and maintained by competent personnel who understand how the systems operate. O/WSs should be given the same close attention given to any other important piece of equipment. The operators, users and maintainers of the O/WS must clarify who will be responsible for monitoring, inspecting, maintaining and servicing the system. Frequent inspections should be made of the system and all associated piping, valves, etc. to prevent operational and mechanical failures or inefficiencies. Sludges and oils that are not periodically removed from O/WSs can render it inoperative. Additionally, leaks from oil/water separators can result in environmental pollution, which can trigger costly investigative studies and cleanups. Rigorous implementation of an O/WS inspection and maintenance plan can prevent discharges from the oil/water separator that may contaminate the environment.

c. Oil/Water Separators Used to Meet SPCC Secondary Containment Requirements

Oil/water separators can be used to meet the SPCC requirements for secondary containment in §§ 112.7(c), 112.7(h)(1), 112.8(c)(2), 112.8(c)(11), 112.12(c)(2) and/or 112.12(c)(11). Additionally, §§ 112.8(b), 112.9(b) and 112.12(b) set forth design specifications and/or drainage associated with secondary containment provisions at the facility. Properly designed, maintained and operated oil/water separators may be used as part of a facility drainage system to meet the secondary containment requirements of the rule.

Standard gravity and enhanced gravity separators or other types of oil/water separators (separator designs may vary), may be used to meet secondary containment requirements. In this application, the separators are expected to have oil and water present in the system when there is oil discharge or oil-contaminated precipitation runoff within the drainage area. Generally, these separators should be monitored on a routine schedule and collected oil should be removed as appropriate in accordance with procedures in the SPCC Plan.

Many oil/water separators used for secondary containment are installed in areas where they may receive considerable flow from precipitation. If the flow rate exceeds the maximum design rate of the separator, the separator may discharge accumulated oil and/or untreated wastewater; therefore, it may be an inappropriate choice for

secondary containment and may result in a discharge to navigable waters and adjoining shorelines. The specifications from the oil/water separator manufacturer outline these and other design factors as important items to consider when specifying the use of a given oil/water separator for a given application. Additionally, the manufacturer specifies the maintenance requirements for these separators that would ensure proper operation of these devices.

When oil/water separators are used to meet SPCC requirements they must be properly operated and maintained to ensure that the unit will perform correctly and as intended under the potential discharge scenarios it is aimed to address (e.g., §§ 112.7(c), 112.8(c)(2) and 112.12(c)(2)). The required oil/water separator capacity should always be available (i.e., oil should not continually accumulate in the separator over a period of time such that the required storage capacity would not be available if an oil release were to occur within the drainage area). The use of oil/water separators as a method of containment may be risky as they have limited drainage controls to prevent a discharge of oil and rely heavily on proper maintenance.

The capacity of an oil/water separator used to meet secondary containment requirements does not count toward a facility's overall storage capacity. Any volume of oil that would flow into the oil/water separator would come from another source within the drainage area that is already generally counted in the facility storage capacity determination. Containers used to store recovered oil after oil/water separation, however, represent additional oil storage and count toward a facility's total storage capacity. These include slop tanks or other containers used to store waste.

F. Visual Inspection

All storage tanks, foundations will be visually inspected by operating personnel as a part of everyday operations. Upon 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 incorporated in the operating file.

G. Safe Vehicle Operation

Operators of vehicles entering the facility will have been trained in safe vehicle operation and have experience at other similar operating tank farms. Warning signs will be posted where appropriate.

H. Operation On-Call Status

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.

I. Daily Inspection

All storage tanks, piping, joints, valve and bodies will be visually inspected by plant employee's as they pursue their daily work. Any and all discrepancies will be reported immediately to their supervisor. Additionally, an entry will be made in the record of any discrepancy and the corrective action taken.

III. Security At Facility

Raider Environmental Facility is fully fenced and the entrance gates are locked when the Facility is not in use or unattended. The Opa Locka Police Department patrols the Facility twenty-four (24) hours a day, seven (7) 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.

IV. Spill Response

Should a spill happen at Raider Environmental Services, Inc.'s Facility, the Qualified Individual (Primary Emergency Coordinator) or Alternate Qualified Individual (Back-Up Emergency Coordinator) will initiate the following: (See Page for Contact Information)

A. 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.

B. 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 thing to remember is to remain calm and try to get the situation under control as soon as possible.

-
- ↓ Don 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.

Spill Containment Procedures

Spills on Pavement:

Call for booms and pads in amounts' appropriate for the spill. Use booms to contain spill. Use a vacuum truck to skim and remove oil. If the spill is too large for booms:

- ↓ Call for sorbents and sand to contain the spreading oil or by using oil dri to circle the spill.
- ↓ Call for a vacuum truck, visqueen and backhoe. Remove oil-soaked sand and place on plastic visqueen and cover sand with additional visquuen to prevent rain from spreading the oil. Steam or pressure wash the pavement or concrete to remove residue.

Spills on Soil:

Call for earth moving equipment (loader, backhoe, dump truck, etc.) 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 oil to vacuum trucks. 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 the backhoe remove one foot below the surface spill, or until visually clean. Call for further assistance to remove soil for treatment. Also, use OVA meter and analysis to determine if further removal is required.

Removal of 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 disposal Facility. Do not make bags heavier than approximately forty (40) pounds each.

V. Security at 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:

- ✚ 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 with toilets and waste disposal facilities in the 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 clean-up contractors and other involved personnel are provided adequate lighting at night.
- ✚ Issue temporary identification badges to all personnel involved in the clean-up 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.
- ✚ Establish 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.

VI. Materials

Item	Size	Count	Quantity	Location
Pads	17"x19"x3/8"	100pads/bale	20	Supply Cage
Boom	10'x8'	4boom/bale	10	Trailer
Boom	10'x5'	4boom/bale	5	Trailer
Rug	36"x300'	1rug/bale	2	Trailer
Rug	18"x30'	2rug/bale	2	Trailer
Pads	18"x18"	100pads/bale	1	Supply Cage
Pillows	9"x15"	16pillows/bag	2	Trailer
Snare		10/box	5	Trailer
Visqueen	20'x100'	1/roll	5	Supply Cage
Plastic Bags	33"x60"	75bags/roll	10	Supply Cage

VII. 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 Raider Environmental Services 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 Raider Environmental Services also offers a contract service of twenty-four (24) hour 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.

VIII. Facility Emergency Response Plan

Name of Facility: Raider Environmental Services, Inc.

Type of Facility: Oily Waste Water Processing Plan

Location of Facility: 4103 Northwest 132nd Street, Opa-Locka, FL 33054

Name and Address of Owner:

Name: Steve Obst

Address: P.O. Box 19645, Plantation, FL 33318

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

Name: J.P. Bluteau

Title: Operations Manager

Name and Address of Emergency Coordinators"

Primary Emergency Coordinator: Steve Obst
210 Southwest 44th Ave, Plantation, FL 33317

Alternate Emergency Coordinator: JP Bluteau
21261 Sawmill Ct, Boca Raton FL 33498

Management Approval

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

Steve Obst
President

A. Review and Update

This Contingency Plan will be reviewed and immediately amended, if necessary, whenever:

- ✦ Applicable regulations are revised;
- ✦ The Plan fails in an emergency;
- ✦ The Facility changes in its design, construction, operation, maintenance or other circumstances, in a way that materially increases the potential for fires, explosions, releases of used oil or changes in the response necessary in an emergency;
- ✦ The list of emergency coordinators changes; and
- ✦ The list of emergency equipment changes.

B. Emergency Response Arrangements

Fire Department: Miami-Dade Fire Department
Emergency Response Arrangements:
Personnel from the responding station toured Raider Environmental Services Facility and are acquainted with the Facility operations and layout. The fire station has a key to the fire box located at the entrance gate.

Police Department: Opa Locka Police Department
Emergency Response Arrangements:
Uniformed personnel have been acquainted with the Facility layout and are familiar with the operations. Police personnel would assume charge of any traffic control issues that should arise in the event of an emergency.

Hospital: Hialeah Hospital
Emergency Response Arrangements:
Telephone conversations have been conducted with hospital representatives confirming the purpose of the contingency plan and the potential hazards associated with Raider Environmental Services processes. Copies of the material safety data sheets for chemicals used in Raider Environmental Services processes are included in the hospital copy of the contingency plan.

C. Emergency Procedure – Responsibilities of the Emergency Coordinator of Designee

1. **Activate** Raider Environmental Services Facility alarm/communication system to notify all Facility personnel by:
 - a. 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. This will notify Plant personnel as well as notify the Alarm Company.
 - b. Call 911 to notify the Fire Department.
3. **Identify** the character, exact-source, amount and extent of any released material. This may be done by observation, review of Facility records and/or chemical analysis.
4. **Access** 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 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 Commander 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 the 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; and
 - f. The possible hazards to human health, the environment or outside the Facility.
6. **Take** all responsible actions necessary to ensure that releases, fires and explosions do not occur, recur or spread to other oil or waste at the Facility.
7. **After** the emergency is over, provide for the recycling, storing or disposal facility of the recovered materials or materials that result from the release, fire or explosion. In 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 the clean-up procedures are completed. All emergency equipment listed in this 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 this 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 types 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; and

-
- g. Estimated quantity and disposition of recovered material that resulted from the incident.

D. 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, the environment or outside the Facility.
7. The name and telephone number of the person or persons to be contacted for more information. List on Page
8. Wait for the other party to hang up, **do not hang up first.**

E. Emergency Contact Phone Numbers

Miami-Dade County Fire Department	Emergency	911
	Local	(786) 331-4259
Opa Locka Public Works Department	Emergency	911
	Local	(305) 953-2828
Opa-Locka Police Department	Emergency	911
	Local	(305) 476-5423
Medics Ambulance Service	Emergency	911
	Local	(305) 687-4040
Hialeah Hospital	Local	(305) 693-6100
National Response Center		(800) 424-8802
US EPA – Region IV		(404) 562-8357
Florida Department of Env. Protection	Emergency	(800) 320-0519
	Local	(561) 681-6600
Dade County Env. Resource Mgmt.		(305) 372-6789
Chemtrec		(800) 424-9300
U.S. Coast Guard		(305) 535-8705

F. Raider Environmental Services, Inc. Emergency Phone List



COMPANY PHONE LIST

Name	Title	Home	Cell
Aragon, Vicente	Field Tech - East Coast	(954) 325-2691 ©	
Archer, Tony	Driver - A - East Coast (U/O Driver)	(786) 229-9895 ©	(305) 494-7683
Barrera, Denys	Mechanic	(786) 219-8733 ©	
Bluteau J P	Ops Manager - East Coast		(954) 465-0504
Burden, Darryl	Driver - A - East Coast	(786) 587-3769 ©	(954) 465-1735
Burns, Craig	West Coast Sales	(813) 349-2770 ©	(813) 520-6179
Carter-Klein, Judy	Accounts Receivable	(954) 401-2309 ©	
Castillo, Roel (Roy)	Driver - A - West Coast (U/O Driver)		(727) 254-7362
Cevallos, Kathy	A.P./H.R. Manager	(305) 785-7327 ©	(954) 594-4879
Dean, Rick	Driver - A - West Coast (U/O Driver)		(941) 586-1760
Dusoc, Eloy			
Gables, Joshua	Driver - A - West Coast (U/O Driver)		(941) 232-8085
Huff, Avery	Driver - A - East Coast (U/O Driver)	(954) 204-4422	(954) 300-6194
Leclair, Bobby	Field Supervisor - East Coast		(954) 543-2862
Machado, Susan	Driver - A - West Coast (U/O Driver)		(727) 254-7212
Machado, Tony	U/O Supervisor - West Coast	(727) 224-6295 ©	(941) 961-9862
McIntyre, Kevin	Driver - B - East Coast		(954) 300-9178
Morales, Luis	Driver - A - East Coast (U/O Driver)		(954) 873-6430
Moya, Alex	Driver - A - East Coast (U/O Driver)	(954) 861-8824 ©	(305) 345-4199
Obst, Steve	President		(954) 605-6853
Obst, Tavia	Controller		(954) 914-8414
Olmeda, Ernesto	Driver - A - East Coast	(305) 244-5648 ©	(954) 393-6140
Pullido, Ivan	Driver - A - East Coast	(786) 537-6164 ©	(954) 529-5257
Rojas, Luciano	Driver - A - East Coast	(305) 305-3430 ©	(954) 594-4036
Ross, Steve	Driver - A - East Coast	(305) 360-5753 ©	(954) 931-8821
Ruiz, Ray	Driver - B - East Coast	(305) 778-5090 ©	(305) 494-6110
Santana, Lazaro	Water Treatment	(786) 897-2634 ©	
Stevens, Rick	Oil Processing		(954) 594-7055
Tamayo, Mario	Field Supervisor - West Coast	(941) 623-5849 ©	(954) 275-1778
Trinka, Kenneth	Driver - A - West Coast	(727) 384-0244 ©	(941) 232-8042
Varela, Toni	Administrative Assitant/Oil	(305) 397-4554 ©	

IX. General Responsibilities

A. Personnel Assignments

1. Emergency Coordinator
 - Steve Obst – Leader
 - JP Bluteau – Back-Up
2. Communications
 - JP Bluteau – Leader
 - Steve Obst – Back-Up
3. Evacuation
 - Rick Stevens– Leader
 - JP Bluteau – Back-Up
4. Emergency Situation
 - Emergency Assessment
 - i. Steve Obst – Leader
 - ii. Bobby Leclaire – Back-Up
 - Spill Containment
 - iii. Steve Obst – Leader
 - iv. Bobby Leclaire – Back-Up
5. Emergency Team
 - Fire Fighting & Spill Containment
 - v. Bobby Leclaire, Rick Stevens, Kevin McItyre
6. First Aid
 - Steve Obst & JP Bluteau

B. Emergency Procedures & Actions

In the event of an emergency situation the emergency coordinator must be notified immediately. If the emergency coordinator cannot be contacted, secondary contacts are provided, see Appendix A of this attachment.

The emergency coordinator will act according to the following procedures:

1. Determine the nature of the emergency; fire, explosion potential, or spill. Identify the source.
2. The Emergency Response Coordinator (ERC) will conduct the response from the primary Emergency Operations Center (EOC) or Command Post. The primary Command Post is located in the main operations building conference room. The laboratory is designated as the alternate Command Post.
3. Determine whether help is required from outside agencies. Call and inform agencies of the situation and solicit their help if necessary.

If the emergency is within the company's scope of service to respond – in-house personnel will be directed for cleanup. If the emergency is beyond the facility's capability, spill containment procedures will be implemented and the proper authorities notified for response.

4. Determine the nature and quantity of materials involved by:
 - i. physical observation/label identification
 - ii. inventory records
 - iii. chemical analysis and/or material profiles
5. Decide what should be done immediately to keep the situation from worsening:

a. Explosion Hazard

Determine whether any reactive substances in the area need to be relocated. If explosion has occurred which does not result in a fire, remove any hazardous obstacles that can be safely retrieved.

b. Spill

If a spill has occurred; determine the source, contain it by using the emergency equipment and absorbent material and initiating any product transfers that may be deemed necessary to minimize the spill.

Obtain the following information:

- a) the material released
- b) location of the material
- c) quantity of material released
- d) any injury from the release

c. Fire Hazard

If fire has occurred, use the fire extinguishers to control the fire, if possible. Do not attempt to control a blaze that appears to be out of control; rely on the proper authority response. Ensure that all storage areas are accessible to fire fighters. If a fire should break out, concentration will be placed on preventing the fire from spreading. The emergency coordinator will monitor for leaks and pressure build-up while awaiting the proper fire-fighting agency.

d. Inclement Weather

In the event of inclement weather (hurricane, electrical storm, tornado), the Emergency Coordinator will make the assessment of the danger.

If the assessment is severe, the Emergency Coordinator will notify the Communications 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 had 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 Facility and offices.

If the work day has not started, the Communication Leader will call the Facility personnel and inform them and then call the main office and inform them.

If the work day is already underway, the Communication Leader will inform the Facility to shut down all operations and then call the main office and inform them.

i. Natural Disaster

As soon as a dangerous situation is assessed, the Emergency Coordinator will be notified. The Emergency Coordinator will decide from the severity of the danger whether to remain in the office or to evacuate.

If evacuation is necessary, then the Emergency Coordinator will announce this to the Communication Leader and/or to the Evacuation Leader. 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.

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.

ii. Hurricanes

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 fire extinguishers units, forklifts, pallets and all other loose objects around the Facility. All empty trailers are to be moved as far away the building as possible. This includes all bulk trailers, box trailers and drum trailers. Secure all plywood sheets and lag bolt into the walls effectively covering window and door openings.

Move as much equipment as possible above ground floor level. An ideal height for water sensitive items is five (5)

feet. 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.

All vertical storage tanks should be filled with at least three (3) feet of product or water to keep tanks from lifting off their foundations should the storm-water in the secondary containment area rise a couple of feet during storm.

e. Evacuation Procedure

i. Purpose

Plan for a safe evacuation of an emergency

ii. Responsibilities

The Emergency Coordinator is responsible for implementing the evacuation procedure.

Each employee is responsible for escorting any visitors from his/her work area to the proper exit.

iii. Procedures

The Emergency Coordinator will notify Management in the event an evacuation becomes necessary.

The Emergency Coordinator will order the evacuation and any other actions required.

When an evacuation is announced, stop work. Exit your work area in accordance with the evacuation routes. All employees must leave the Facility unless instructed otherwise by the Emergency Coordinator. Do not run and do not linger in the hallways or doorways.

Each employee must report to his/her Manager once outside the Facility and each Manager must report to the Emergency Coordinator. All personnel must be accounted for.

The Emergency Coordinator will notify the Managers when it is safe to re-enter the Facility. All employees will stay outside the Facility until notified by the Manager it is safe to re-enter.

f. All Clear

-
- i. Before the facility may be brought back into production following an emergency event, the emergency coordinator must:

Have the facility declared safe for re-entry by any outside organizations responding.

All involved materials must be accounted for and properly stored.

Emergency equipment has been cleaned and is ready for use

NOTE: In the event of an emergency all personnel will discontinue any telephone conversations. Personnel escorting visitors must accompany the visitor to the nearest safe exit. All workstations will be shutdown.