From: Snyder, Bernard F [bernard.

snyder@fccenvironmental.com]

Sent: Tuesday, February 18, 2014 8:06 AM

To: Winston, Kathy

Cc: Fuoco, Anthony

Subject: RE: draft inspection reports for Ft. Pierce and

Pompano Beach facilities

Attachments: Contingency Plan with site attachment Pompano February 2014.pdf; Contingency Plan with diagram Fort Pierce February 2014.pdf

Corrected contingency plans for Ft. Pierce and Pompano Beach branches.

From: Winston, Kathy [mailto:Kathy.Winston@dep.state.fl.us]

Sent: Wednesday, February 05, 2014 2:24 PM

To: Snyder, Bernard F

Subject: draft inspection reports for Ft. Pierce and Pompano Beach facilities

Bernie, Please find attached these draft inspection reports for the recent inspections of the facilities mentioned above. The reports spell out more clearly what records I am requested and any corrective actions that are required to return your facilities to compliance. The citations related to any of the issues brought up during our debriefing are also provided within these draft reports. If you have any questions concerning these reports, please feel free to contact me either by phone or by email at the information provided below.

Kathy Winston Environmental Consultant Hazardous Waste Compliance/Enforcement (561)681-6756 Fax (561)681-6770 Kathy.Winston@dep.state.fl.us

Work Hours - 7 am to 5 pm Monday to Thursday I am not in the office on FRIDAYS

Florida's Water - Ours to Protect: Check out the latest information on Florida Water Issues at http://www.protectingourwater.org/ presented by the Florida Department of Environmental Protection.

FCC ENVIRONMENTAL, LLC POMPANO BEACH, FLORIDA ATTACHMENT 6 PREPAREDNESS AND PREVENTION CONTINGENCY PLAN

The purpose of the contingency plan is to minimize hazards to human health or the environment from fires, explosions, or any unplanned sudden or non-sudden releases of hazardous wastes or hazardous material and constituents to the air, soil, or surface waters.

The Preparedness and Prevention Contingency Plan is a combination of the facility Spill Prevention, Control and Countermeasures (SPCC) Program and the Emergency Action Plan (EAP), as permitted under 40 CFR 279.52 (b)(2)(ii)). Requirements pertaining to the Preparedness and Prevention Contingency Plan are being addressed by including both the SPCC and EAP Plans as tabbed sections at the end of this attachment.

The Plan must be implemented immediately whenever there is a fire, explosion, or unplanned release of hazardous material that could threaten human health or the environment. The original document is located in the main office.

During an emergency situation, the emergency coordinator must be notified immediately. The individuals designated as Emergency Coordinators and their contact information is listed in the SPCC Plan and in this attachment. The primary Emergency Operations Center (EOC) or Command Post is located in the main office building conference room.

The EOC is the communications hub, staffed by the Emergency Coordinator and members of the emergency response teams who are responsible for coordinating the emergency incident. If the Emergency Coordinator cannot be contacted, secondary contacts are provided in both the SPCC and EAP Plans. Detailed descriptions of emergency procedures are outlined in the attached SPCC and EAP Plans.

PREPAREDNESS AND ARRANGEMENTS WITH LOCAL AUTHORITIES

Plan copies will be distributed to the local sheriff's office, fire department, and hospitals. MSDS information for materials that are handled at the FCC Pompano facility (providing first aid toxicological, possible injury/illness due to fire and exposure information) will be provided to the local hospital and all potential first responders.

Emergency Equipment

In the event of an emergency, the procedures to be implemented are outlined in the Emergency Action Plan (EAP). Procedures required during a possible release of material are outlined in the SPCC Plan. Equipment that can be used during an emergency is listed at the end of this attachment, and detailed instructions are included in both plans. An updated figure has been provided showing the location of all emergency equipment.

During a power outage, communications can be maintained by direct connect cellular phones. Many personnel have direct connect cellular phones that can be used if the facility phone system is not operational.

All emergency equipment in all plants, such as fire monitors, emergency eyewash/showers, is inspected and flushed monthly. Equipment that operates on independent power is properly charged prior to storage.

Fire extinguishers, eyewash stations, showers, and spill kits are strategically located throughout the facility. Locations have been determined by area usage and the potential for harm. Fire extinguishers are checked and tagged in accordance with fire safety practices. Annual inspections of the fire extinguishers are performed by an outside contractor.

Secondary containment is also provided to contain released materials. Any sealant to be used is chosen based on its resistance to petroleum products.

A facility map that shows the location of emergency equipment, spill containment equipment, and emergency communication equipment is attached.

Fire Response

Should personnel discover a fire or smell smoke, they would contact 911 immediately and follow the procedures outlined in the EAP. The responding fire station has been provided with the FCC Environmental, LLC's facility Plans and is acquainted with the facility operations and layout. The fire station has permission to cut the lock on the gate for access to the facility in the event of an emergency after hours. An emergency contact number is posted for reponders to contact regarding inventory records. In the event of a fire, the EAP contains in Section 4.1 detailed measures to be undertaken by facility personnel.

Evacuation

All personnel, including visitors and contractors, must leave the building through the proper exit. All tank farm/drum storage area personnel will evacuate north and proceed north past the fleet maintenance building. Personnel located in the water treatment area will evacuate north through the main gate. Personnel working in the drum handling areas

will evacuate to the west and then north through the main gate. All personnel will assemble across the street from the parking area located on NE 48th Street. An evacuation route diagram is provided in Appendix A of the Emergency Action Plan (EAP).

RECORD KEEPING AND REPORTING

The Emergency Coordinator must keep a record of any and all emergency events. Verbal reports are to be presented within 24 hours of each incident, with written reports submitted within seven days. Reports are to be filed with the following agencies:

Florida Department of Environmental Protection

Physical Address:

Southeast District Office Phone: (561) 393-5877

7251 West Palmetto Park Road, Suite 303

Boca Raton, FL 33433

State & Local Agencies

FDEP – Tallahassee (normal business hours)

Phone: (850) 245-8707

National Response Center

Phone: (800) 424-8802

State Warning Point (24 hour- spill contact)

Phone: (800) 320-0519

(Emergency Management, State of Florida)

EPA Emergency Response (Atlanta) Phone: (404) 562-8700

Broward County Department of Planning and

Environmental Protection Phone: (954) 519-1270

Broward County Department of Compliance

And Monitoring Section Phone: (954) 831-3076

The report will include the following information:

- a) Name, address, and telephone number of the emergency coordinator
- b) Name, address, and telephone number of the facility
- c) Date, time, and type of incident
- d) Name, type and quantity of materials involved
- e) Any injuries that may have occurred
- f) An assessment of the actual or potential harm to human health and the environment

g) Estimated quantity and disposition of any materials recovered

The contingency plan will be maintained at the facility and submitted to local emergency response authorities, which are identified in this plan. Copies of return receipts will serve to verify receipt of the plan by the local response authorities. The plan will be amended when necessary (i.e., regulations change; plan fails upon use; the facility owner, process, or contingency plan is modified; etc.).

Emergency Contacts for FCC Environmental, LLC Pompano Beach, FL Facility

1) Bernie Snyder, Branch Manager Home: 7639 Mardell Court, Orlando, FL 32835

Work / Mobile: 813-638-7009

2) Angelo Pousa, Area Manager Home: 5639 Superior Drive, Lakeland, FL 33805

Work: 813-754-1504 ext.3117 Mobile: 954-868-1376

3) Scott Crandall, EHS Director Home: 3600 Tenth Street, St. Petersburg, FL 33704

Work: 813-754-1504 Mobile: 813-335-5341

4) Oil Spill Contractor- SWS Environmental First Response

Emergency Contact number: 877-742-4215

Note: Emergency contacts 1-3 have authority to commit funds for cleanup.

SECURITY

In accordance with 40 CFR Part 265.14 (b) there is a barrier around the active portions of the facility and a means to control entry. The facility is secured by steel chain-link fencing and/or concrete security wall on all sides. In addition, the main entrance gate is an automatic gate monitored by the office. The exit gate is also an automatic gate, normally closed. The facility typically operates 7:00 AM to 6:00 PM Monday through Friday. However the facility may occasionally be in operation 24 hours a day.

At the facility, visitors check in with the on-duty dispatcher and are required to sign in and review general safety guidelines.

