CBI
Cliff Berry, Incorporated
Environmental Services

October 1998

Mr. Vincent Peluso
Florida Dept. of Environmental Protection
P.O. Box 15425
West Palm Beach, Florida 33416

Re: SPCC/Contingency Plan

Dear Plan Holder,

Please find attached the latest revisions to the Cliff Berry, Inc. SPCC/Contingency plan for our Fort Pierce facility.

If you have any questions, please call me at (954)763-5455.

Sincerely,

William E. Parkes, Jr.
Miami Facility Manager

P.O. Box 13079 Port Everglades Station Fort Lauderdale, Florida 33316 (954) 763 3390 fax (954) 763 8375

CBI

Cliff Berry, Inc.

Spill Prevention Control & Countermeasurement Plan

And

Contingency Plan and Emergency Procedures

Fort Pierce Facility

CLIFF BERRY, INC.

Spill Prevention Control & Countermeasure Plan

And

Contingency Plan and Emergency Procedures

FORT PIERCE FACILITY

400 Angle Road
Fort Pierce, Florida 34946

Location: Latitude: 27° 03' 94" North
Longitude: 80° 32' 57" West

Telephone Numbers:

Fort Pierce Facility	(561) 466-4063
Fort Lauderdale Facility	(954) 763-3390
24 Hr Emergency Response	(800) 899-7745
Miami Terminal Facility	(305) 638-2030

Mailing Address:

Post Office Box 13079
Port Everglades Station
Fort Lauderdale, Florida 33316

Responsible Person:

Cliff Berry II
President and QI

Revised October 1998

Plan No. ___/___

FORT PIERCE FACILITY
SPCC AND CONTINGENCY PLAN
DISTRIBUTION LIST

PLAN NO.	ENTITY
1	Florida Department of Environmental Protection (DEP)
2	St. Lucie County Health Department
3	St. Lucie County Sheriff's Department
4	St. Lucie County Fire Department
5	Lawnwood Regional Medical Center
6	Fort Pierce Facility
7	Larry Doyle (CBI)
8	Bill Parkes (CBI)

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Spill Prevention Control & Countermeasure Plan

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(continued.)
Contingency Plan and Emergency Procedures

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(Continued)

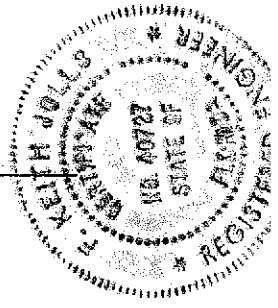
1.

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.

7/16/97

Name, Signature & Seal of Professional Engineer



Approval

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

CLIFF BERRY II

Name of Responsible Officer

PRESIDENT

Title of Responsible Officer

Signature of Responsible Officer

2.

Introduction

The Fort Pierce Facility is owned and operated by Cliff Berry, Inc. It is located at: 27° 03' 94", North Latitude and 80° 32' 57" West Longitude. The facility has a local address at 400 Angle Road, Fort Pierce, Florida 34946

The person in charge of the facility is Rob McGinness, Sr. He can be reached 24 hours a day at 1-800-899-7745. The facility is operated 8 (eight) hours a day, 5 (five) days a week. May be operated 24 (twenty-four) hours a day as needed.

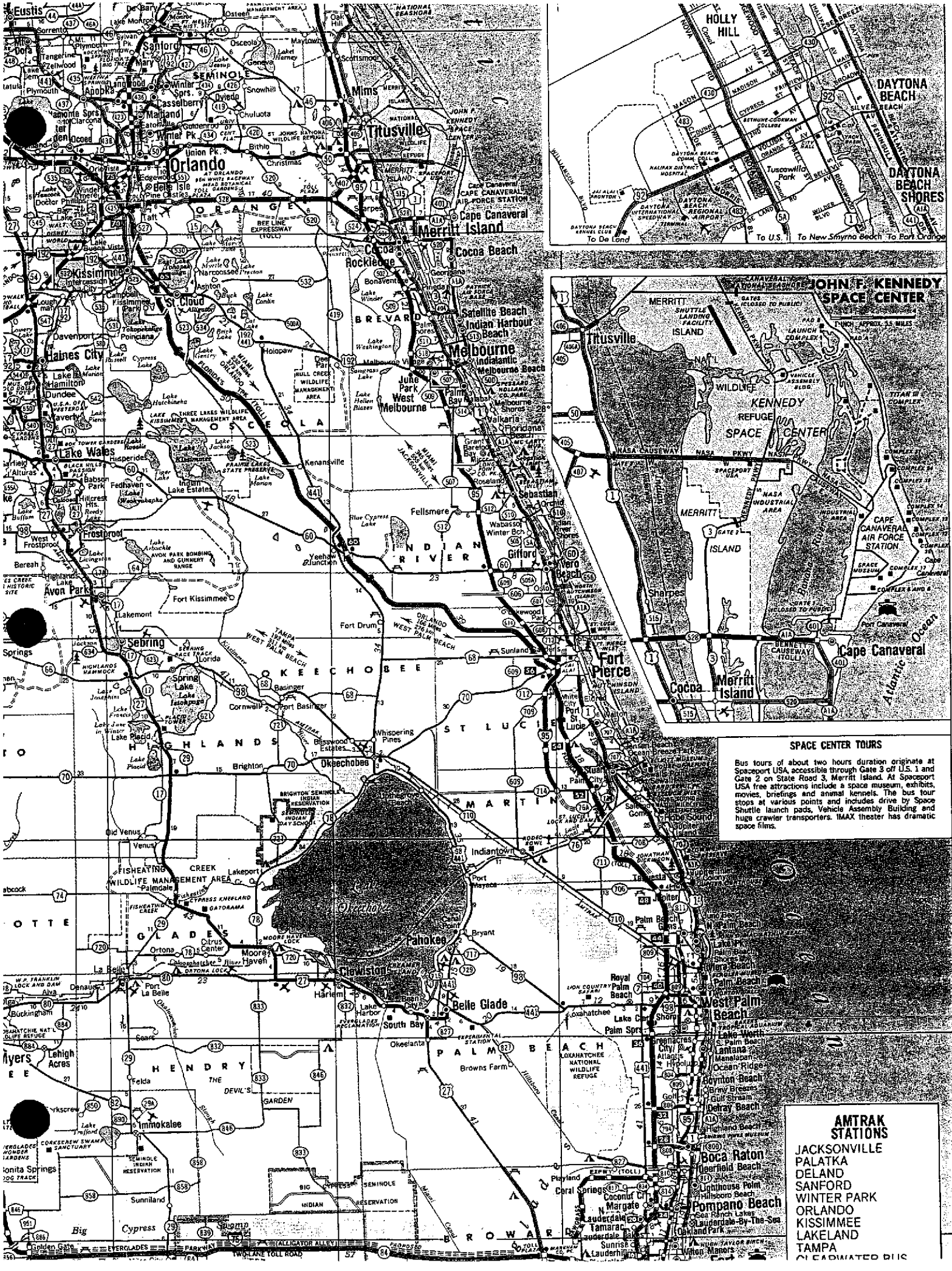
The facility does not accept Haz Waste and has not had a spill in the past 12 (twelve) months.

The site of this facility, which covers 1.5 acres, is shown in Figure No. 1 (one line sketch). The terrain is relatively flat throughout.

The Fort Pierce Facility has incorporated secondary containment in all areas where during normal operations there is a reasonable potential for an oily wastewater spill.

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

During normal operations, all products are received from trucks.

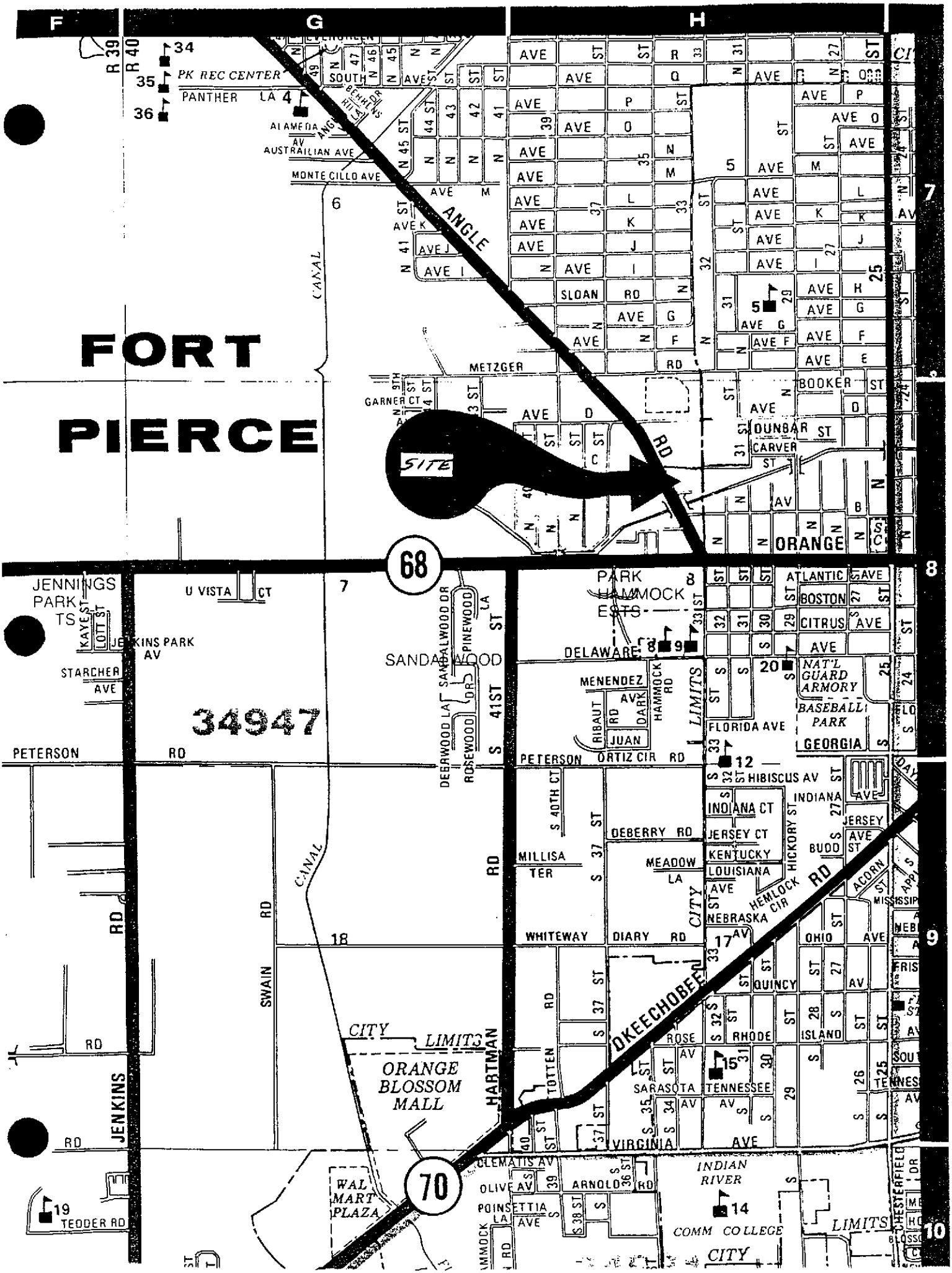


SPACE CENTER TOURS

Bus tours of about two hours duration originate at Spaceport USA, accessible through Gate 3 off U.S. 1 and Gate 2 on State Road 3, Merritt Island. At Spaceport USA free attractions include a space museum, exhibits, movies, briefings and animal kennels. The bus tour stops at various points and includes drive by Space Shuttle launch pads, Vehicle Assembly Building and huge crawler transporters. IMAX theater has dramatic space films.

AMTRAK STATIONS

JACKSONVILLE
PALATKA
DELAND
SANFORD
WINTER PARK
ORLANDO
KISSIMMEE
LAKELAND
TAMPA
CLEARWATER PLUS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CARVER ST
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JENNINGS PARK TS
U VISTA CT
JENKINS PARK AV
STARCHER AVE
34947
PETERSON RD
SANDALWOOD
41ST ST
PARK HAMMOCK ESTS
DELAWARE
MENENDEZ AVE
RIBAUT RD
DARK HAMMOCK RD
JUAN ORTIZ CIR
FLORIDA AVE
NAT'L GUARD ARMORY
BASEBALL PARK
GEORGIA
ATLANTIC AVE
BOSTON
CITRUS AVE
HIBISCUS AV
INDIANA CT
JERSEY CT
KENTUCKY
LOUISIANA AVE
NEBRASKA
HEMLOCK CIR
OKEECHOBEE RD
DEBERRY RD
MILLISA TER
MEADOW LA
WHITEWAY
DIARY RD
CANAL
SWAIN RD
JENKINS RD
HARTMAN RD
CITY LIMITS
ORANGE BLOSSOM MALL
WAL MART PLAZA
70
QUINCY
ROSE
RHODE ISLAND
SARASOTA
TENNESSEE
VIRGINIA AVE
CLEMATIS AV
OLIVE AV
POINSETTIA AVE
ARNOLD RD
INDIAN RIVER
COMM COLLEGE
CITY
LIMITS
TEDDER RD
PK REC CENTER
PANTHER LA
ALAMEDA AV
AUSTRALIAN AVE
MONTE CILLO AVE
SOUTH AVE
GARNER CT
9TH ST
DEERWOOD LA
ROSEWOOD DR
SANDALWOOD DR
PINEWOOD LA
LOTT ST
KAYE ST
BUDD AVE
ACORN ST
HICKORY ST
TOTTEN RD
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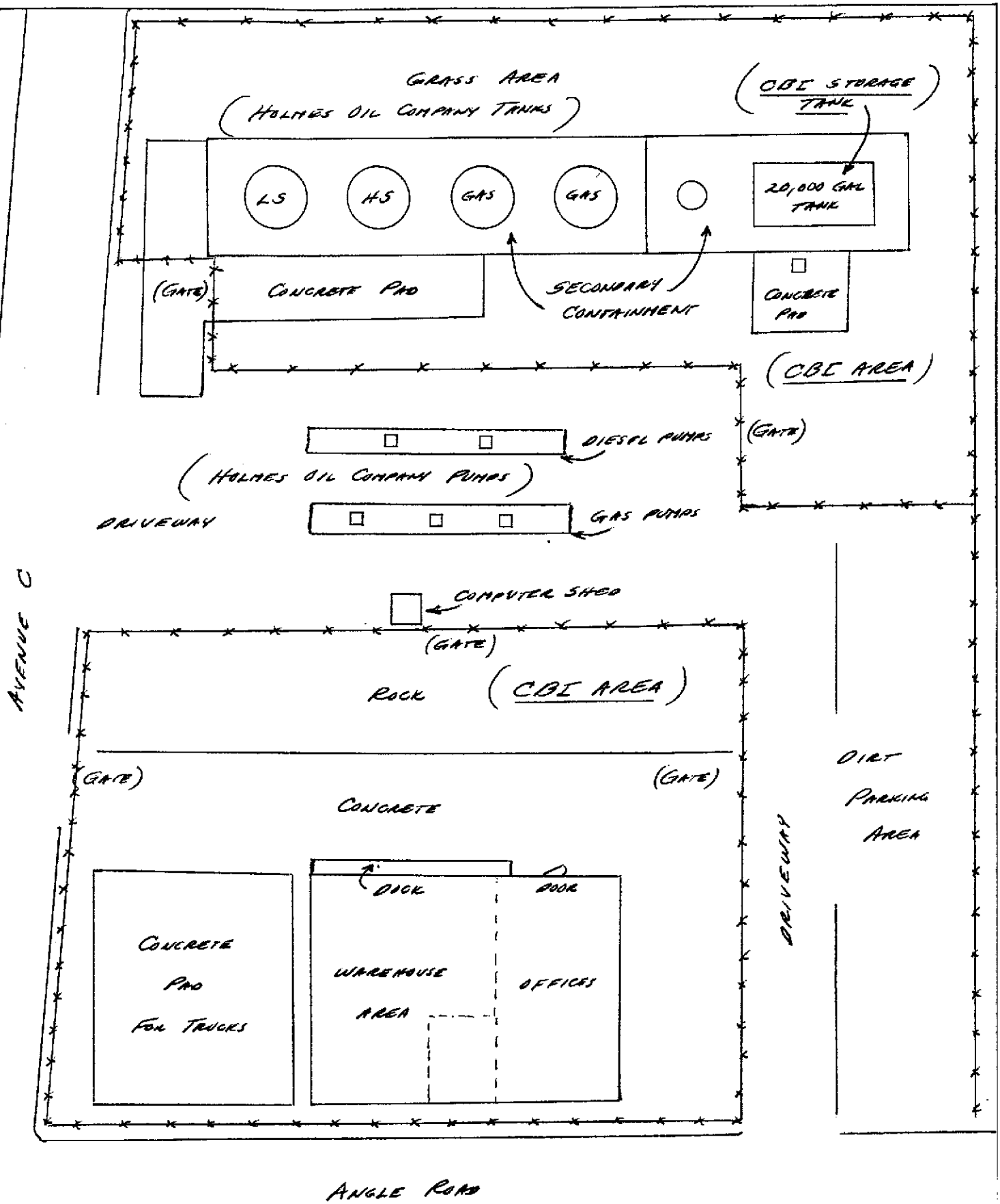


FORT PIERCE TERMINAL FACILITY

CHEFF BERRY, INC.

SITE PLAN

← NORTH

(NOT TO SCALE)

FIGURE No. 1

Table # 1

Horizontal Tank

Tank #	Date Installed	Size (Gallons)	Material of Construction	Products
FP1	9-95	20,000	Steel	Waste oil / Water

2A. Spill Events:

This facility was originally constructed in 1985 and previous spill events are as follows:

NO spill events have taken place since Cliff Berry, constructed the facility.

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 on the concrete containment area would be contained in the diked area and pumped out for reclaim and/or disposal in an approved site.

2C. Bulk Storage Tank:

The materials and design of the bulk storage tank are compatible with the product it holds. A tank integrity inspection will be made of the tank daily and records will be kept of results of inspections in logbooks. The tank's foundations and supports will be visually inspected daily during routine operations. The 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 devices	Daily	Yes
Aboveground valves, pipe & fittings (visual)	Daily	Yes
Corrective actions	As Required	Yes

3.
On Shore Storage Tank Farm & Truck Loading Facility

Cliff Berry, Inc.'s waste oil storage tank farm and truck loading facility is located at 400 Angle Road, Fort Pierce, Florida 34946. Cliff Berry, Inc.'s mailing address is: P. O. Box 13079, Port Everglades Station, Fort Lauderdale, Florida 33316

The storage tank has been individually inspected and repaired where applicable and evaluated for its suitability to store the oily waste waters collected from a materials and construction point of view. In addition, containment for the tank facilities has been designed to contain the holdings in the tank plus ten percent (10%). There are no by-pass valves used in any system that would allow an inadvertent spill outside the storage tank containment facilities.

3A. Dikes, beams or retaining walls sufficiently impervious to contain spilled oil:

Cliff Berry, Inc.'s waste oil tank facility is contained by a concrete wall approximately 32 inches high by 8 inches in thickness; secondary containment is provided by an 8 inch thick impervious concrete slab located within the concrete containment wall. One storage tank used for waste oil storage and oily water is situated on steel stands anchored to an 8 inch concrete pad within the retaining wall.

3B. Curbing:

A 15' x 15' concrete slab is also located outside the tank farm, in the truck unloading area. The slab is sloped inward toward the retaining wall and also has a curb around it, in order to prevent run off of spilledmaterials. (Minimal spills)

3C. Culverting, gutters or other drainage systems; sumps:

The tank farm has one (1) concrete impervious sump located within the sloped concrete pad at the truck unloading area. Should a spill occur, this sump 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 retention ponds at this facility.

3F. * Sorbent materials:

Note: see equipment and Sorbent list.

3G. Spill and rain water 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 materials to an approved disposal site.

Similarly rain water will be pumped out of the containment area and disposed of with our other waste water.

3 H. Visual Inspection:

The storage tank, 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.

3 I. Fail Safe Operation:

Consideration has been given to "Fail Safe" operation where applicable. The receiving tanks (atmospheric storage) are gauged and recorded daily to prevent inadvertent over-filling 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. Communication equipment will be tested periodically and repaired as required. Spare parts in sufficient quantity will be maintained as recommended by the manufacturers.

3 J. Safe Vehicle Operation:

Operators of vehicles entering the facility will have been trained in safe vehicle operation and have several years experience at other similar operating tank farm 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. Containment has been provided in this area.

3K. Operation On-Call Status:

The facility is fully fenced and gates are locked when it is unattended. 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.

3 L. Storage tanks and piping inspection:

Procedure;

The storage tank, 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 WILL BE MADE ON THE FIRST WORKING DAY OF EACH MONTH. RECORDS OF THESE INSPECTIONS WILL BE MAINTAINED ON-SITE.

4.

Security at The Facility

The Cliff Berry, Inc. Facility is fully fenced and the entrance gates locked when the facility is not in use or unattended. A vigilant guard dog is employed to preclude unwanted intruders from the office warehouses and vehicle storage area. The St. Lucie County Sheriff's Department patrol's the facility 24 hours a day, seven days a week.

The facility lighting has been improved where applicable to enhance visibility during hours of darkness enabling greater awareness of operations and the added prevention of acts of vandalism.

5.

Spill Response

Should a spill happen at Cliff Berry, Inc.'s facility, the Qualified individual or Alternate Qualified individual will initiate the following:

5A. Emergency spill response procedure

Immediate steps for drivers and facility technicians:

- stay with vehicle until help arrives
- use emergency numbers in spill plan to contact line management
- keep the public away
- dike off or boom liquids from entering sewers, storm sewers or water ways, follow emergency plan 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 thing is to remain calm and try to get the situation under control as much as possible.

Do not panic, remain calm. If you or anyone else is hurt or incapacitated, call for medial 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 waterways.

5C. Spill containment procedures

Spills on pavement:

Call for booms and pads in amounts appropriate for 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;

a. Call for sorbents and sand, and contain spreading oil by using sand or Oil Dri to circle the spill.
b. Call for vac truck, visqueen and backhoe. Remove oil-soaked sand onto plastic visqueen and cover sand with additional visqueen to prevent rain from spreading oil. Steam 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 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 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 all 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.

6.

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 officials.

- Establish equipment and clothing distribution areas so personnel and equipment can be checked in and out.

- To insure secure operations provide guards, toilet, and waste disposal facilities in decontamination and food serving areas.

- Establish First Aid kits or 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 sites. 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 in procedures for tools and/or 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 to security and related operation.

7.

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
Steel over pack drums	10	drums
Poly over pack 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	gal.
Industrial solvent	55	gal.
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

LIGHT EQUIPMENT

DESCRIPTION	QUANTITY
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

8. 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 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 Cliff Berry, Inc. also offers a contract service of 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 Cliff Berry, Inc.

CBI PERSONNEL TRAINING REQUIREMENTS

ON AND OFF SITE EMERGENCY EVENT (by 29 CFR 1910.120)

TRAINING IS DEPENDENT UPON RESPONSIBILITIES AND THE LEVEL OF RESPONSE

1. First Responder Operations Level
29 CFR 1920.120 (q)(6)(ii)

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.

These personnel receive at least eight hours of training or have had sufficient experience to objectively demonstrate competencies as outlined in 29 CFR 1910.120(q)(6)(iii)(A)-(F).

2. Hazardous Materials Technician
29 CFR 1910.120(q)(6)(iii)

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.

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 in 29 CFR 1910.120(q)(6)(iii)(A)-(I)

3. Hazardous Materials Specialist
29 CFR 1910.120(q)(6)(iv)

Personnel who respond with and provide support to hazardous materials 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 1910.120(q)(6)(iv)(A)-(I).

4. On Scene Incident Commander
29 CFR 1910.120(q)(6)(v)

Personnel receive at least 24 hours of training equal to the first responder operations level and have additional competencies as outlined in 29 CFR 1910.120(q)(6)(v)(A)-(F).

5. Refresher Training
229 CFR 1910.120(q)(8)(i)

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.

POST-EMERGENCY CLEANUP (OFF SITE)

1. Personnel
OSHA Instruction CPL 2-2.51(11/05/90)

Minimum of 4 hours for job duties with a low magnitude of risk.

29 CFR 1910.120(e)(3)

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.

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.

2. Management and supervisor
29 CFR 1910.120(e)(4)

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.

3. Refresher Training
29 CFR 1910.120(e)(8)

Personnel specified in (e)(1) and (e)(4) above shall receive 8 hours of refresher training annually and any critiques of incidents that have occured in the past year that can serve as training examples of related work, and other relevant topics.

4. Equivalent Training
29 CFR 1910.120(e)(9)

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 provide the initial training requirements. Employer shall provide a copy of the certification or documentation to the employee upon request.

POST-EMERGENCY ON SITE

1. Site Employees, Management and Supervision
29 CFR 1910.120(q)(11)(iii)

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.

2. Refresher Training
29 CFR 1910.38(a)(5)(iii)(A)-(C)

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.

29 CFR 1910.1200(h)

Employers shall provide employees with information and training on hazardous chemicals in thier work area at the time of initial assignment, and whenever a new hazard is introduced into their work area.

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
OI 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 Yrs	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 Yrs	1	USEPA, USCG RSPA	Corporate Team/ OSRO
AGENCY INITIATED DRILLS				
DRILL TYPE	FREQUENCY	ADVANCED NOTICE	INITIATING AUTHORITY	RESPONSE TEAM AFFECTED
Unannounced Talbetop 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 unannounced.
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

CBI Cliff Berry Incorporated
Environmental Services

Rev: 10/15/98

TRAINING RECORDS TRACKING

Name	Position	Hire Date	Fit Test	Respirator Issue Date & Size	1st Responder Ops Level Training	40 Hour HazWoper	24 Hour HazWoper	8 Hour Hazmat recert.	8 Hour Haz waste Supv.	8 Hour HM 181, 126F, 215	8 Hour IC	Confined Space	Haz. Waste Mgmt.	ReCert Due
Arabitg, Arnoldo	Miami Facility Supervisor	12/05/95	Y			11-04-96		2/12/98				11/08/96		2/99
Armstrong, Louis	Field Tech	3/05/97	Y	4/30/98 L	5/01/97	6/20/97		6-25-98				2-26-98		6/99
Benitez, Eduardo	Tank Farm Oper.	1-14-98			3/18/98									3/99
Berry, Cliff II	President	----------	Y			06/08/90	08/11/89	6-25-98	02/15/95 02/15/95	01/13/95	11/15/93 02/16/95	05/04/91	11/14/91	6/99
Brown, Steve **CDL**	Driver	4/21/97	Y	4/28/98 L	5/01/97	6/20/97				8/27/97		2-26-98		6/98
Brenner, Craig	Driver	5/26/98								4/23/96				
Camacho, Jose ** CDL **	Driver	9/23/98				10-9-98						10/7/98		11/99
Cerna, Jackson	Field Tech	10/3/96	Y		10/3/96	11-04-96		2/12/98		8/27/97		11/08/96		2/99
Cerna, Louis ** CDL**	Driver	10-20-97	Y	4/28/98 L	10/24/97	2-27-98						2-26-98		2/99
Church, Don **CDL**	Used Oil Manager	06/14/91				03/27/92		6/08/97	02/15/95	01/13/95	11/15/93 02/16/95		1-16-97	6/99
Courtney, Samuel	Field Tech	10/3/96	Y	4/17/98 L	10/3/96	11-04-96		11-25-97		8/27/97		11/08/96		11/98

Name	Position	Hire Date	Fit Test	Respirator Issue Date & Size	1st Responder Ops Level Training	40 Hour HazWoper	24 Hour HazWoper	8 Hour Hazmat recert	8 Hour Haz waste Supv.	8 Hour HM 181, 126F, 215	8 Hour IC	Confined Space	Haz Waste Mgmt	ReCert Due
** CDL **														
Datiz, Jaime ** CDL **	Field Tech	3-25-98	Y	4/17/98 L	10-26-96	11-04-96		11-25-97				11/08/96		11/98
Davis, John	Mechanic/Heavy Equip Operator Field Tech	06/16/84					05/10/90	1/30/96 5/01/97						5/98
Davis, Ralph	Field Tech.	4/15/98			4/16/98	4/25/98								4/99
Devlin, Bernie	Project Manager	01/25/93	Y			12/11/87 06/30/89		6/08/98	12/16/90 02/15/95	01/12/95	02/20/95 2/21/96	11/04/94		6/99
Dotchin, James	Asst. Haz Waste Coordinator	4/27/98			HazCom	5/22/98								6/99
Dow, Brandon ** CDL **	Proj. Manager	2-2-98	Y	4/28/98 L		1/8/93		6-25-98		12/13/96		2-26-98		12/99
Doyle, Larry	Exec. V. P.	09/18/95				12/7/80 6/3/96		3/18/98 6-25-98		8/27/97	2/20/96	11/08/96 2-26-98	1/98	6/99
Dubois, Jean Reginal	Field Tech	11/13/95	Y	4/15/98 L		1/30/96		6/25/98				6/15/96		6/99
Forehand, Daniel **CDL **	Systems Coord.	06/03/96			6/3/96	11-04-96	6/14/96	4/16/98				6/15/96 11/08/96		4/99
Francis, Jason	Field Tech	2-23-98	Y			2-27-98						2-26-98		2/99
Freeman, Ronald	Tank Farm Operator	9-28-98												
Gilot, Jean	Miami Fac. Tech.				2-12-98									2-99
Gladd, Kevin	Supv. Operations	07/23/90				01/11/91	09/20/90	6/14/96	02/15/95		02/16/95			9/98

Name	Position	Hire Date	Fit Test	Respirator Issue Date & Size	1st Responder Ops Level Training	40 Hour HazWoper	24 Hour HazWoper	8 Hour Hazmat recert	8 Hour Haz waste Supv.	8 Hour HM 181, 126F, 215	8 Hour IC	Confined Space	Haz. Waste Mgmt	ReCert Due
CDL								9/9/97			2/20/96			
Gonzalez, Lorenso **CDL**	Driver/Field Tech	3/12/98	Y	4/16/98 L		2-19-98		4/16/98				4/9/98		4/99
Goren, Richard	Field Tech	4/27/98			HazCom	5/22/98								6/99
Hoover, Mark	Haz Waste Coord.	9/16/97		L		1-20-95		6/20/97 6/25/98		7-5-95			1-16-97	6/99
Hudson, Steve	Welder	12/15/97			3-18-98									3/99
Izydorczak, Gerald	Project Manager	02/19/96	Y			05/19/95		6/14/96 8-15-97		11/93	02/20/96	6/15/96		8/98
Johnson, Frank **CDL**	Field Tech	10/17/95				1/30/96	1/18/96	11-25-97						11/98
Katzor, John **CDL**	Driver, Ft. Pierce	07/20/98			7/31/98					7/30/98		7/29/98		8/99
Lippreindt, David **CDL**	Field Tech	03/07/95	Y	L		07/16/93	11/04/92	6/08/98				11/15/93		6/99
Magnuson, Richard **CDL*	Field Tech	01/03/96	Y			1-30-96	1/18/96	8-15-97				6/15/96		8/98
McClendon, Jimmy **CDL**	Driver	05/20/96				11-04-96		4/16/98		8/27/97		6/15/96		4/99
McEady, Adrian **CDL**	Driver	08/15/97			9/9/97					8/27/97				9/98
McGinness Jr., Rob	Driver, Ft. Pierce	10-20-97	Y			6/2/95		6/08/98				6/15/97		6/99
McGinness SR, Rob														

Name	Position	Hire Date	Fit Test	Respirator Issue Date & Size	1st Responder Ops Level Training	40 Hour HazWoper	24 Hour HazWoper	8 Hour Hazmat revert	8 Hour Haz waste Supv.	8 Hour HM 181, 126F, 215	8 Hour IC	Confined Space	Haz. Waste Mgmt	ReCert Due
CDL	Supv. Ft. Pierce	10/04/94	Y				11/04/94	7/30/96 8-15-97	02/15/95	01/13/95	02/16/95	6/15/96		8/98
Mills, Paula	Receptionist	9/22/98												
Miranda, Eric ** CDL **	Ft Lauderdale Facility Operator	09/09/97				9-18-92		4/16/98		9-25-93				4/99
Moll, Glen	Regional Coordinator	03/18/96				6/6/94		8/19/98						8/99
Morgan, Elmer *** CDL ***	Field Tech	4/29/98				11/4/94								
Morgan, Fredrick	Field Tech	7/14/98				11/20/97		10/7/98				10/7/98		11/99
Myers, Amy	Lab Tech	09/11/95						8/15/97						8/98
Oceguera,Mitchell *** CDL ***	Driver	09/29/97						11-25-97						11/98
Owens, John	Field Tech	09-28-98				10/9/98						10/7/98		11/99
Parkes, Bill	Manager-Miami	12/28/93				07/22/94		6/14/96 8-15-97	02/15/95		02/16/95 2/20/96			8/98
Pierson, Robert **CDL**	Driver	4/04/97			5/01/97									5/98
Pringle, Gene	Welder	07/24/95				11/15/94		5/01/97						5/98
Randolph, Ernie ** CDL **	Driver	8/04/96			3/27/92			6/25/98						6/99
Richard, James	Miami Fac. Tech.	8-29-97			9-9-97									9-98

Name	Position	Hire Date	Fit Test	Respirator Issue Date & Size	1st Responder Ops Level Training	40 Hour HazWoper	24 Hour HazWoper	8 Hour Hazmat recert	8 Hour Haz waste Supv.	8 Hour HM 181, 126F, 215	8 Hour IC	Confined Space	Haz. Waste Mgmt	ReCert Due
Rivera, Jose	Field Tech.				HazCom	10/9/98						10/7/98		11/99
Rivera, Santos	Filter Crusher	9/23/98												
Rodriguez, Carlos **CDL**	Driver Field Tech.	3/10/98	Y	4/15/98 L	3/18/98	4/25/98						4/9/98		4/99
Roe, Nicole	Operations Asst.	1/6/97			1/24/97			6/08/98						6/99
Rolon, Isrido **CDL**	Field Tech.	07/01/97			2-12-98	5/22/98								6/99
Sanchez, Gustavo **CDL**	Field Tech./Driver	3/9/98	Y	4/15/98 L	3/18/98	4/25/98						4/9/98		4/99
Shell, Dan **CDL**	Driver	10/02/95				1/30/96		8-15-97						8/98
Sica, Mike **CDL**	Foreman	4/13/98		4/17/98 L		9/28/90	3/26/93	2/18/98 6/25/98	2/26/93	1/14/95		7/29/98		6/99
Sills, David **CDL**	Foreman	09/12/89	Y	4/17/98 L		07/16/93	06/14/90	6/14/96 9/9/97		01/13/95	11/05/93 02/16/95	11/04/93 11/04/94		9/98
Smith, Jeff	Dir. Facility Operations	12/02/91	Y			03/27/92	N/A	6/25/98	02/15/95		02/16/95 2/21/96	11/15/93 11/04/94		6/99
Smothers, Ileana	Operations Coord	04/16/90	Y			07/22/94	11/15/93	11-95-97			2/20/96			11/98
Smothers, Jay **CDL**	Foreman	09/12/92	Y	4/27/98 L		07/16/93	07/14/93	6/08/98 6/25/98	02/15/95	01/12/95	02/16/95	11/04/94 2-26-98		6/99
Stevens, Richard	Field Tech.	10/17/97			11-25-97							2-26-98		11/98

Name	Position	Hire Date	Fit Test	Respirator Issue Date & Size	1st Responder Ops Level Training	40 Hour HazWoper	24 Hour HazWoper	8 Hour Hazmat recert	8 Hour Haz waste Supv.	8 Hour HM 181, 126F, 215	8 Hour IC	Confined Space	Haz Waste Mgmt.	ReCert Due
Veles, Jean Gilot,	Miami Fac. Maint.	1/14/98			2-12-98									2/99
Williams, Eustace **CDL**	Field Tech	01/10/96	Y			05/02/93		8-15-97 6/25/98				6/15/96		6/99
Williamson, Jay **CDL**	Driver	12/27/97				yes								
Womack, Melvin ** CDL**	Driver	8/24/98				10/9/98						10/7/98		11/99
Wood, Charles	Facility Operator	9/16/96	Y			7-22-94		9/18/96 10/24/97		1-13-95		11-3-94		10/98

9.

Facility Emergency Response Plan

Name of Facility: Fort Pierce Terminal Facility

Type of Facility: Oily Wastewater Transfer Facility

Location of Facility: 400 Angle Road
Ft. Pierce, FL 34946

Name and address of Owner or Operator:

Name: Cliff Berry, Inc.

Address: P.O. Box 13079
Ft. Lauderdale, FL 33316

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

Name and Title: Rob McGinness, Sr
Fort Pierce Facility Manager

MANAGEMENT APPROVAL

The individual designated as the Emergency Coordinator and the individuals designated as Alternate 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 continency 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: St. Lucie County Fire Department
   Copy of contingency plan: _____(see next page)_____
   Emergency Response Arrangements:_____
   _____
   _____

2. Police Department: St. Lucie County Sheriff's Department
   Copy of Contingency plan: _____(see next page)_____
   Emergency Response Arrangements: _____
   _____
   _____

3. Hospital: Lawnwood Regional Medical Center
   Copy of contingency plan: _____(see next page)_____
   Emergency Response Arrangements: _____
   _____
   _____

4. Emergency Response Contractor:_____Cliff Berry, Inc._____

Emergency Coordinators

1. Primary Emergency Coordinator

Name:	Rob McGinness, Sr.
Title:	Fort Pierce Facility Manager
Address:	1578 SE Tiffany Club Place
	Port St. Lucie, Fl 34952
Phone:	Office (800)556-8389 or (561) 466-4063
	Home (561) 337-4367
	Beeper (888) 450-9753
	Mobile (954) 325-7406

2. Back Up Emergency Coordinator

Name:	John Katzor
Title	Field Tech./Driver
Address:	640 18th Ave
	Vero Beach, FL 32962
Phone:	Office (800) 556-8389 or (561)466-4063
	Home (561) 770-0586
	Beeper (561) 357-1699

Fort Pierce Fax Number (561) 466-3507

Emergency Procedures
Responsibilities of the Emergency Coordinator or Designee

1. Activate the Ft. Pierce Facility alarm/communication system to notify all facility all facility personnel by:

    A. Notify facility personnel by word o mouth.

    B. Notify headquarters in Ft. Lauderdale

2. Notify appropriate State or Local agencies with designated response roles if their help is is needed. In the case of fire or explosion:

    A. Call 911 to notify fire department.

3. Identify the character, exact-source, amount and extent of any released materials. This may be done by oberservation, 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 local authorities. Be available to help local authorities decide whether local areas should be evacuated.

Emergency Procedures
(Continued)

5. Notify immediately the government official designated as the on scene coordinator or the National Response Center, using their 24 hour toll free number (800)424-8802. The report must include:

    A. Name and telephone number o 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 froma release, fire or explosion. In the affected areas(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 o until cleanup procedures are completed. All emergency equipment listed in the continency plan needs 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 40CFR part 279.52 before resuming operations in the affected area(s) of the facility.

9. Note in the operating record the time, date and details of any incident that requires implementing the continency plan.

Emergency Procedures
(Continued)

10. Submit a written report within 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;

B. 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 material(s) 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 9.4)

8. Wait for the other party to hang up, do not hang up first.

Emergency Contacts Phone Numbers

1. Fire.....(St. Lucie County Fire Department).....911

2. Police...(St. Lucie County Sheriff's Department).....911

3. Ambulance 911

4. Nearest emergency medical facility
   Lawnwood Regional Medical Center.....(407)461-4000
   1700 S. 23rd Street
   Fort Pierce, Florida

5. National Response Center.....(800)424-8802

6. Federal - U.S. EPA, Region IV.....(770)347-3016

7. State - Florida DEP.....(561)433-2650
   Emergency Response.....(305)467-5970

8. Local - St. Lucie County Environmental Health Department.(561)462-3939

9. Chemtrec.....(800)424-9300

10. U.S. Coast Guard.....(305)535-8705

Revised July 1997

CBI
Cliff Berry, Incorporated
Environmental Services

EMERGENCY RESPONSE PHONE LISTING

Please call 1-800-899-7745 for 24 hour response.

To expedite, please provide the following information:

* NAME
* TYPE OF MATERIAL
* ACTUAL AREA, SPECIFY LAND OR SEA
* AMOUNT OF MATERIAL (APPROX.)

FOR NON-EMERGENCIES

(954) 763-3390 or 1-800-899-7745
Office hours: 8:00 am - 5:00 pm

If calling after 5:00 p.m., please leave message with answering service

EMERGENCY RESPONSE PERSONNEL

NAME	TITLE	HOME#	BEEPER #	MOBILE#
Cliff Berry II	President	(954)525-3810	(954)307-4881	(954)325-7392
Jeff Smith	Dir. Environ. Services	(954)846-7483	(954)469-0596	(954)325-7415
Gerald Izydorczak	Project Manager	(954)845-0241	(954)244-3406	(954)325-7400
Bernie Devlin	Project Manager	(954)389-8330	(954)244-3564	(954)325-7397
Brandon Dow	Project Manager	(954)963-8117	(954)244-3765	(954)325-9525
Ileana Smothers	Operations Coordinator	(954)746-9220	(954)244-1667	(954)325-7419
Don Church	Dir. Used Oil/Haz Waste	(954)522-7147	(954)244-7134	(954)325-7395
*Rob McGinness	Facility Manager	(561)337-4367	(888)450-9753	(954)325-7406

* Fort Pierce Facility

P.O. Box 13079 Port Everglades Station Fort Lauderdale, Florida 33316 (954) 763 3390 fax (954) 763 8375

10.

Personnel Assignments

A. Coordination (Emergency Coordinator)

1. Rob McGinness, Sr.(Leader)
2. John Katzor (Back Up)

B. Communication

1. Rob McGinness, Sr.(Leader)
2. John Katzor (Back Up)

C. Evacuation

1. Rob McGinness, Sr. (Leader)
2. John Katzor (Back Up)

D. Emergency Situation

1. Emergency Assessment - Rob McGinness, Sr. (Leader)
   John Katzor (Back Up)

2. Spill Containment - Rob McGinness, Sr. (Leader)
   John Katzor (Back Up)

E. Emergency Team

1. Fire Fighting - Rob McGinness, Sr.
2. Spill Containment - John Katzor

F. First Aid

1. Rob McGinness, Sr.
2. John Katzor

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 operations. In the event that the communication leader is out of the office, then 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.

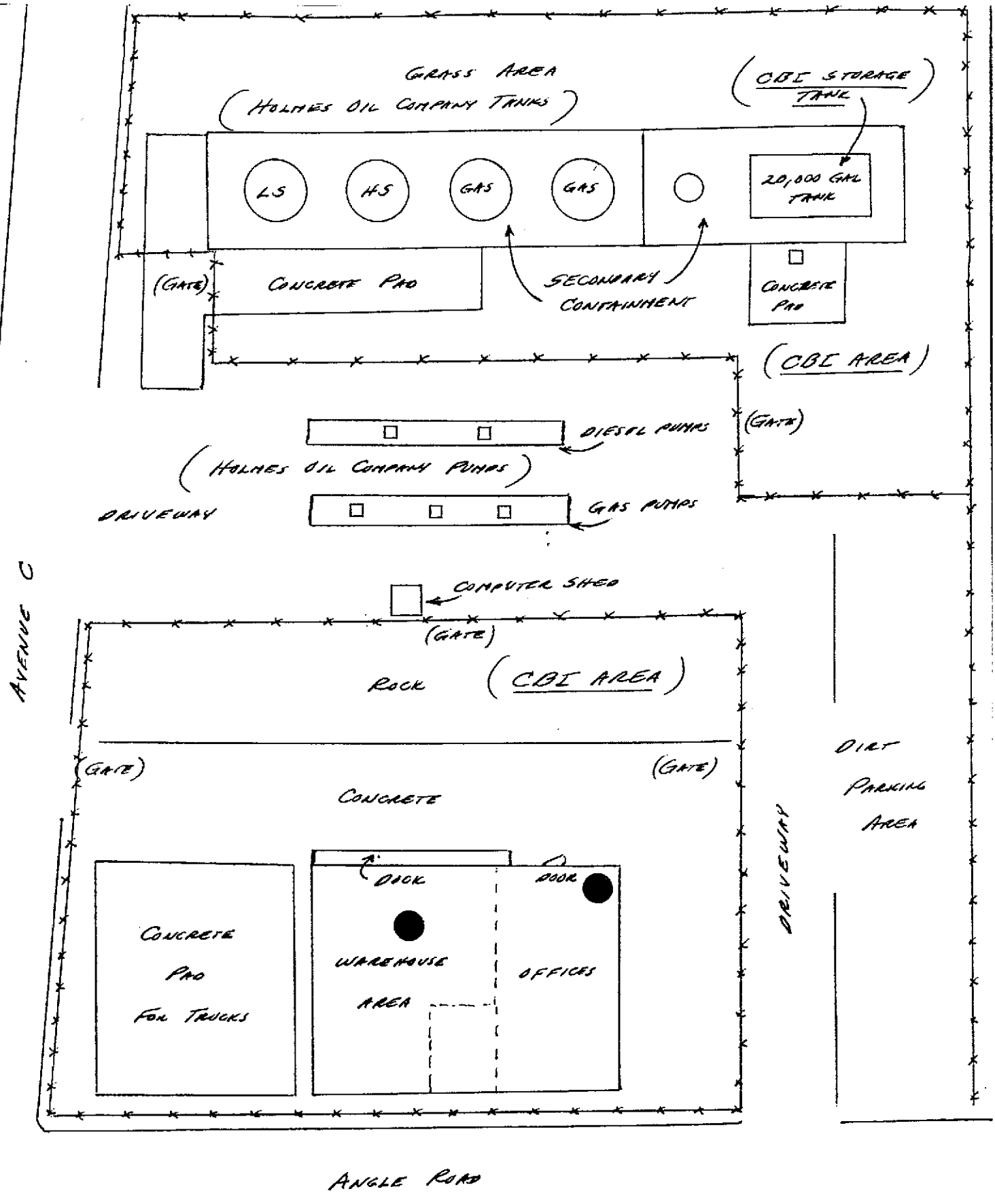
C. Evacuation - Responsible for guiding personnel to staging area. Makes sure that all personnel are out of the plant in an evacuation. Assist's coordinator in his tasks. Conducts head count at the staging area.

D. First Aid - Responsible for cardio pulmonary resuscitation and first aid to the other employees in case of accidents.

11. Fire Control Systems and Equipment

1. Fire control equipment consists of:

   Two dry chemical fire extinguishers in office and warehouse. They are inspected and certified (tagged) on an annual basis.



FORT PIERCE TERMINAL FACILITY

CHEFF BERRY, INC.

SITE PLAN

← NORTH

● LOCATION OF FIRE EXTINGUISHERS

(NOT TO SCALE)

Emergency Procedures

Fire

1. Upon initial sighting, notify all personnel by word of mouth and notify Fire Department immediately by calling 911. 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 notified.

   Emergency personnel will be given the following information:

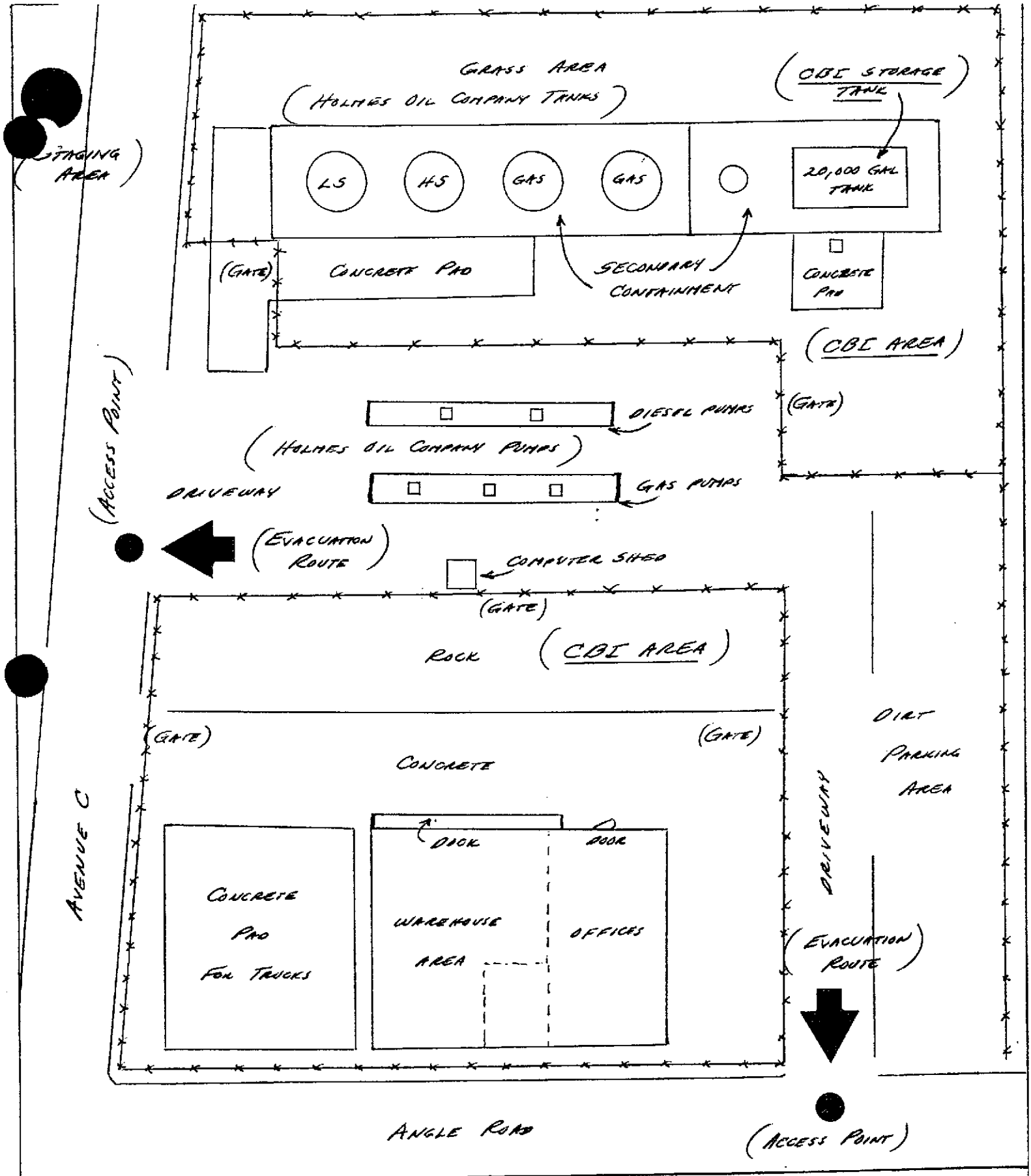
(See notification Page 9.8)

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.
- Depending on the location of the plant, personnel should evacuate via the front or rear of the plant and proceed to the Staging Area.
- CBI management, under direct orders from the fire chief, will permit re-entry into the plant when safe.



FORT PIERCE TERMINAL FACILITY

CHEF BERRY, INC.

SITE PLAN

EVACUATION ROUTES

(NOT TO SCALE)

Shutdown of Operation

- Shut down all pumps.
- Close man ways, access ports to tank.
- Close all valves.
- Remove vehicles from sit e if it can be done safely.
- Shut down power to product movement areas.
- Open perimeter access gate for emergency crews.
- Move fire extinguishers to the location of the emergency crews.
- All nonessential personnel are to evacuate the premises immediately. Personnel should report to the staging area so they can be accounted for.
- Plant personnel will provide security of site until emergency crews arrive.
- UNDER NO CIRCUMSTANCES 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 be 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.

12

Bomb Threat Procedures

1. Purpose

   To provide for the orderly gathering of information during a potentially stressful situation.

2. 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.

3. Saftey

   Remain calm. This will alow the maximum amount information to be be exchanged. Do not antagonize the other party.

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

4. Procedure

   A. Handling the Call:

      a. Try to keep the caller on the line and make notes.

      b. Get spcific information on what is going to happen.
         1. When will it go off?
         2. Were 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 the 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 Conditon-drunk, on drugs, etc.
         6. Voice characteristics-accent, speech defects
         7. Ethnic Origin

Bomb Threat Procedure
(continued)

(Handling the Call-Con'd from page 12.1)

d. What background noises are present? Truck, 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 11.3.
3. If there is time, organize a search with a minimum of employees. Stop the search and evacuate thiry (30) minutes prior to scheduled detonation.

5. Search - Overt Type

Potential bombs have nostandard appearance. Be alert for any boxes (cardboard, metal or wood), suitcases, cans, sections of pipe or toher objects whcih appear out of place.

A. Begin the search around the outside of each building and work in. The employee most familiar with a building should search that building.

B. Inside buildings begin along the outside walls and work to the center. Grond 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 AN 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.

Bomb Threat Procedure
(contiuned)

(Search-Con'd from page 12.2)

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 fromt he object.

I. In the event of a detonation, activate the emergency response plan.

J. Do not return to the building or location until the all clear is received.

6. Publicity

A. All persons involved in the incident should be encouraged to keep the incident confidential.

B. All inquiries from the public news media should be handled by the communication leader. If communication leader is not available, take a number and state that a return call will be made.

Bomb Threat Call Checklist

Question 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 o fbomb is it?	_____
5. What will cause it to explode?	_____
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:

____Calm	____Laughing	____Lisp	____Disguised
____Angry	____Crying	____Raspy	____Accent
____Excited	____Normal	____Deep	____Familiar
____Slow	____Distinct	____Ragged	____Stutter
____Rapid	____Slurred	____Cracking Voice	____Soft
____Loud	____Deep Breathing	____Clearing throat	

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

Background Sounds:

____Street noises	____House noises	____Factory	____Local
____Crockery	____Motor	____Animal noises	____Clear
____Voices	____Long Distance	____Office Machinery	____Booth
____PA System	____Music	____Static	

Other (explain): _____

Threat Language:

_____Well Spoken (educated)	_____Foul	___Incoherent
_____Message read by threat maker	_____Irrational	___Taped

Remarks:_____

Report call immediately to: _____
(DIAL 911)

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

Person Receving the call: _____ Position: _____

Phone number call received on: - -

Phone call taped: Y / N

13

All Clear

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

  1. The Emergency Coordinator
  2. The Communicator

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

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

  2. If outside emergency repsonse 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.

All Clear

On 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 additonal equipment may be required depending on what type on emergency transpred.

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 have 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 cupable.

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Medical Emergency

- 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 determing 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 otherinformation 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.

- All office and plant personnel are to be trained in first aid and CPR. This training is to be used until relieved by fire Rescue personnel.

Fire/Rescue	911
1. Lakewood Regional Medical Center 1700 S 23rd Street, Fort Pierce, FL	(407) 461-4000

The following personnel have been trained in CPR and First Aid:

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 employee is known.
- Rescue will not ebe attempted when the structure involved is on fire.
- Rescue activities involved with product releases will fall within the paameteres of the SPCC Plan.
- No rescue efforts ar eto 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.

15.

Inclement Weather

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 workday. 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 thunderstorms and sporadic heavy rains which interfere with safe operations. During these times, shelter will be sought in the plant and main offices.

3. If the workday has not started, the communication leader will call the other office personnel and inform them. He will call the main office and inform them.

4. If the workday is already underway, then the communication leader will inform the office to shut down. The receptionist will inform the main office.

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 evacuate.

3. If evacuation is necessary, then the emergency coordinator will announce this to the communication leader and/or to the evacuation leaders.

Natural Disaster (continued from page 15.1)

4. The plant will evacuate through the evacuation routes. Evacuation will be done in an orderly manner.

5. If the imminent danger does not permit time 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, forklifts, 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 drums trailers.

C. If there is ample time, 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 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 one foot of product or water to keep tank from blowing over in hurricane force winds. This procedure only needs to be done if hurricane winds will be in excess of 100 M.P.H.

Note: It is best if tanks can be filled to safe max fill levels to weather the hurricane.