



Cliff Berry, Inc.
Environmental Services

May 31, 2016

Certified Mail: 7015 0640 0002 1213 2158

Kathy Winston
Florida Department of Environmental Protection
400 North Congress Ave, Suite 200
West Palm Beach, FL 33401
Kathy.Winston@dep.state.fl.us
(561)681-6756

RECEIVED

JUN 20 2016

FL DEP
WEST PALM BEACH

Re: Response to Compliance Inspection 5/18/16

Dear Ma'am,

Cliff Berry, Inc. (CBI) is in receipt of the notice of Potential Hazardous Waste Non-Compliance form related to the inspection you performed at 400 Angle Road, Fort Pierce, FL on May 18, 2016. CBI has addressed the issues as described below:

1. The four vertical tanks in question are storage tanks for on-spec fuels (vehicular diesel or unleaded gasoline) that are not sourced from petroleum storage tank systems and therefore do not fall under the PCW exemption rule. The tanks are registered with the FDEP on Placard No.: 456487. We do not believe we are out of compliance on this item.
2. The general facility inspection log has been re-introduced in the form of the Standard Diary (ie. red inspection book) and will be kept daily beginning May 23, 2016. In order to ensure this book is maintained, it is the responsibility of the Area Manager to monitor the inspections and recordation each week.
3. The SPCC Plan (Contingency Plan) for the Fort Pierce location has been updated and enclosed here for the FDEP's records. The language that reflects the purpose of the contingency plan is found on page 1 of Section 2: Introduction. In regards to the ability to commit funds, all Emergency Coordinators have the ability to commit resources to fully implement the Contingency Plan. CBI is unique in that we self-perform emergency response and cleanup measures as strategized in the Contingency Plan, which is performed by our in-house 24-hour emergency response team. We do not believe we are out of compliance with this item.
4. The training records were emailed to the Department on May 19, 2016.

Thank you for the opportunity to respond to the potential non-compliance issues from the inspection. We hope this response satisfies the Department's inquiries, and we urge you to please contact our compliance department at compliance@cliffberryinc.com if you have any further questions or concerns. We appreciate the partnership we have with the Department and always strive to be good stewards of our environment.

Name
Date
Page 2 of 2

RECEIVED

JUN 20 2016

FL DEP
WEST PALM BEACH

Sincerely,

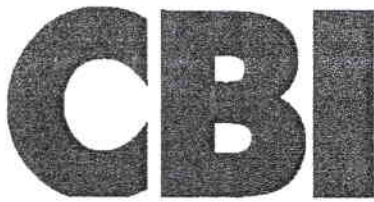
A handwritten signature in blue ink, appearing to read "Cliff Berry, II.", is written over the word "Sincerely,".

Cliff Berry, II.
CEO

compliance@cliffberryinc.com

Cc: Paul Meding, Steve Collins, Kelly Brandenburg

Enclosure: Updated SPCC Plan – Fort Pierce



RECEIVED

JUN 20 2016

FL DEP
WEST PALM BEACH

Spill Prevention Control & Countermeasure Plan
And
Contingency Plan and Emergency Response
Fort Pierce Facility

CLIFF BERRY, INC. (CBI)
SPILL PREVENTION CONTROL & COUNTERMEASURE PLAN (SPCC)
AND
CONTINGENCY PLAN AND EMERGENCY PROCEDURES

PORT EVERGLADES FACILITY

3400 S.E. 9TH Avenue, Dania Beach, Florida 33316

EPA ID Number: FLR000009266

Location: Latitude 27 – 03 – 94 North Longitude: 80 – 32 – 57 West

Telephone Numbers:	Fort Pierce Facility	(772) 466-4063
	24 Hour Emergency Response	(800) 899-7745
	Fort Lauderdale (Main Office)	(954) 763-3390

Mailing Address: PO Box 13079, Fort Lauderdale, FL 33316

Responsible Person: Cliff Berry II CEO and Qualified Individual (QI)
Paul Meding Facility Manager (cell) (772) 519-6015

Plan No. _____

**FORT PIERCE FACILITY
SPCC AND CONTINGENCY PLAN
DISTRIBUTION LIST**

PLAN NO.	ENTITY
1	Florida Department of Environmental Protection
2	St. Lucie County Health Department
3	St. Lucie County Sheriff's Office
4	St. Lucie County Fire Department
5	Lawnwood Regional Medical Center
6	Fort Pierce Facility Copy
7	Cliff Berry II (CBI)
8	Steve Collins (CBI)

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Record of Changes

Change No.	Date of Change	Section	Description of policy	Initials
01	4.27.16	0	Update to QI and Distribution List	RSC
02	4.27.16	9	Update Emergency Contact	RSC
03	5.20.16	1	Add Purpose and Disclaimer	RSC
04	5.20.16	All	Amend footer to Cliff Berry, Inc.	RSC
05	5.26.16	2 & 3	Revised and moved Tank Table to Sec. 3	RSC
06	5.26.16	2 & 11	Updated Site Plan Sketches	RSC
07	5.26.16	7	Updated Materials table	RSC

Note: Make all changes upon receipt.

CERTIFICATION OF SPCC PLAN

CERTIFICATION

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

DAVID M. AMBROSE, 3/16/2015 David M. Ambrose

Name, Date, Signature & Seal of Professional Engineer

Approval

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

Richard E. Gathright

President and COO

Name of Responsible Officer

Title of Responsible Officer


Signature of Responsible Officer

CLIFF BERRY, INC. – FORT PIERCE FACILITY
SPILL PREVENTION CONTROL AND COUNTERMEASURES PLAN (SPCC)
AND
CONTINGENCY PLAN AND EMERGENCY PROCEDURES

EPA REGULATIONS FOR STORAGE TANK PERIODIC INTEGRITY TESTING
PER 40 CFR 112.7(d)

1. The five (5) shop-erected above ground storage tanks (AST) are located within concrete secondary containment. The above referenced tanks are visually inspected daily by facility personnel for integrity and leakage during normal facility operations. The above referenced ASTs were inspected and certified by CBI's professional engineer at the time of their installation in 1994. The next inspection and certification by CBI's professional engineer will be in 2020.
2. All facility valves and piping are above ground and located within concrete secondary containment. The above referenced valves and piping are visually inspected daily by facility personnel for integrity and leakage during normal facility operations.

INTRODUCTION

Purpose: The purpose of this plan is to provide guidance in the event of a fire, explosion, or spill of hazardous waste or hazardous constituents. The plan describes the facility, response equipment, descriptions of response positions and provides contact information for CBI personnel and emergency responders as well as medical and governmental offices that might also respond to the emergency or provide medical care.

Disclaimer: This is a planning document and cannot foresee all emergencies or describe all types of responses and should be used given the limitations inherent in planning documents and guidance.

Facility:

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

The person in charge of the facility is Facility Manager noted in Section 9. He can be reached twenty-four (24) hours a day at 1-800-899-7745. The facility is operated eight (8) hours a day, five (5) days a week. It may be operated twenty-four (24) hours a day as needed.

The facility does not accept hazardous waste.

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, Section 3

During normal operations, all products are received from trucks.

Spill Events:

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

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

Prediction of Spill Behavior:

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

Bulk Storage Tanks:

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

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
Above ground valves, pipe & fittings (visual)	Daily	Yes
Corrective Actions	As required	Yes



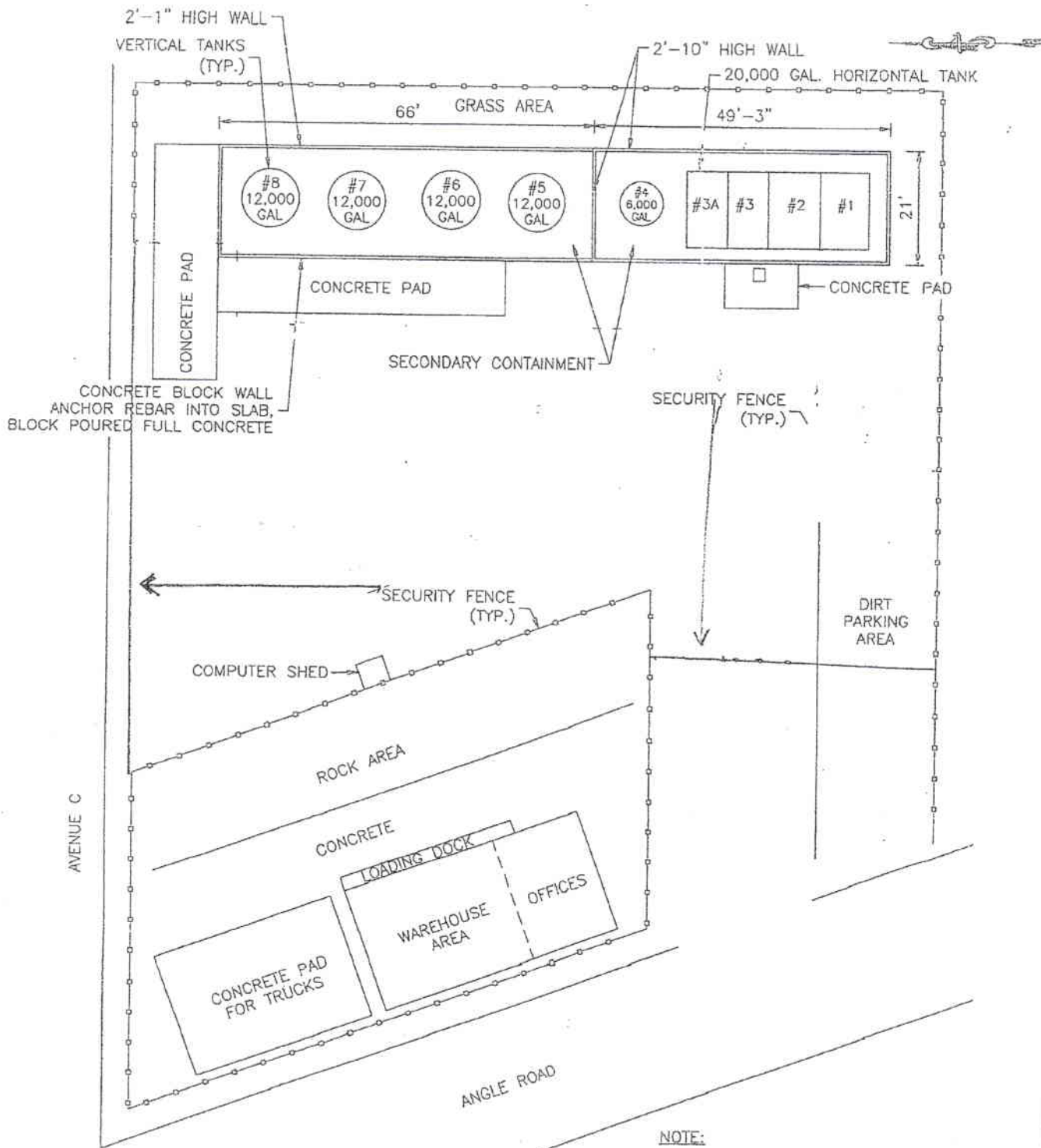
Cliff Berry, Incorporated
Environmental Services

33CFR 154.310 (a) (1) -
Ft Pierce Facility:

Geographic Location of the



CBI
Ft. Pierce
Transfer Facility
400 Angle Road
Ft. Pierce, FL. 34946



NOTE:

TANKS #1, #2, #3, AND #3A IS A SINGLE HORIZONTAL CYLINDRICAL PARTITIONED UNIT ON A SADDLE.

REVISED: 5/21/15

D.M. AMBROSE, P.E. FLORIDA REGISTRATION NO. 12331	SCALE:	N.T.S.	D.M. AMBROSE, CIVIL ENGINEER CONSULTING ENGINEER P.A. NOTED ON PLANS FOR THIS PROJECT PHONE: 888-666-4444 - (FLORIDA)	CBI FORT PIERCE FACILITY
	DATE:	5/1/15		
	DRAWN BY:	ROW		SITE PLAN SKETCH
	CHECKED BY:	DMA		
DESIGNED BY:	DMA			

SEAL

OILY WASTE WATER AND USED OIL STORAGE TANK FARM

On Shore Storage Tank Farm & Truck Loading Facility

Cliff Berry, Inc.'s oily waste water and used oil storage tank farm and truck loading facility is located at 400 Angle Road, Fort Pierce, FL 34946. Cliff Berry, Inc.'s mailing address is PO Box 13079, Fort Lauderdale, Florida 33316.

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

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

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

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 slight curb to it in order to prevent run off of spilled material (minimal spills.)

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, the sump would be used to catch spilled material.

Spill Diversion Ponds:

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

Retention Ponds:

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

Sorbent Materials:

Note: see equipment and sorbent list.

Spill and Rainwater Disposal:

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

Similarly, rainwater will be pumped out of the containment area and disposed of with the facility's other waste water.

Inspections

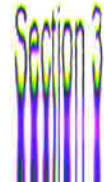
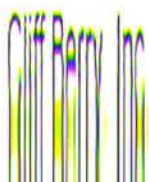
All storage tanks, foundations and structural supports will be visually inspected by operating personnel as part of everyday operations. Upon the first indication of any degradation the necessary and appropriate action will be taken to correct the problem. Records of visual inspections will be maintained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

Fail Safe Operations

Consideration has been given to "Fail Safe" operation where applicable. The receiving tanks (atmospheric storage) are equipped with high-level sensors that are engineered to sound an alarm prior to inadvertently 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. Level sensors and communication equipment will be tested periodically and repaired as required. Spare parts in sufficient quantity will be maintained as recommended by the manufacturers.

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 facilities. Warning signs will be posted where appropriate. There is minimum probability of damage to above ground piping. Operators will be trained in loading/unloading procedures to preclude spills and containment has been provided in this area.



Security Response

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.

Storage Tanks and Piping Inspections

All storage tanks, piping, joints, valve glands and bodies, pipeline supports, metal surfaces and other above ground 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 AND AVAILABLE TO DERM'S STAFF.

Table #1

Horizontal Tanks

Tank #	Date Installed	Size (Gallons)	Material of Construction	Products
01/2/3/3A	9/95	20,000	Steel	Four compartments Used Oil/Water

Vertical Tanks

Tank #	Date Installed	Size (Gallons)	Material of Construction	Products
04	3/96	6,000	Steel	Other non-regulated
05	3/94	12,000	Steel	Vehicular diesel
06	3/94	12,000	Steel	Unleaded gas
07	3/94	12,000	Steel	Unleaded gas
08	3/94	12,000	Steel	Vehicular diesel

SECURITY AT FACILITY

The Cliff Berry, Inc. facility is fully fenced and the entrance gates are locked when the plant is not in use or unattended.

The St. Lucie County Sheriff's Department patrols the facility twenty-four (24) hours a day, seven days a week.

Facility lighting has been installed to enhance visibility during hours of darkness enabling greater awareness of operations and the added prevention of acts of vandalism.

SPILL RESPONSE

Should a spill happen at Cliff Berry, Inc.'s facility, the qualified individual (Primary Emergency Coordinator) or alternate qualified individual (Back-up Emergency Coordinator) will initiate the following: (See section 9 for contact information)

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 boom liquids from entering sewers, storm sewers or water ways, follow emergency plans for further containment

Emergency Response Plan

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

- ◆ Do not panic, remain calm. If you or anyone else is hurt or incapacitated, call for medical assistance.
- ◆ Evaluate the degree of contamination to the facility and estimate the number of gallons spilled.
- ◆ Pump liquid back into one of the standby storage tanks
- ◆ Do your best to dike ahead of the spill to prevent oil from entering sewers and water ways.

Spill Containment Procedures:

Spills on pavement:

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

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

Spills on soil:

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

Remove Oil Soaked Sorbent Material:

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

SECURITY ON SPILLS

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

Checklist

- ◆ Contact a security company to provide guards where equipment is being stored and 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 toilets and waste disposal facilities in decontamination and food serving areas.
- ◆ Establish First Aid kits or First Aid facilities throughout the clean-up area. Consider hiring off duty nurses to attend to general first aid treatment cases. They would also be qualified to determine when and if a person requires 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.
- ◆ Assign a key person to monitor all contractor activities regarding people, equipment in use, and hourly accounting.
- ◆ Assign security personnel to report safety infractions in the work place directly to the OSC at the Command Center.

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

MATERIALS

SPC OIL SORBENT			
NAME	SIZE	PACKING	QUANTITY
SPC 100 Pads	17" x 19" x 3/8"	100 Pads/Bale	10
SPC 200 Pads	17" x 19" x 3/16"	200 Pads/Bale	10
SPC 50 Pads	34" x 38" x 3/8"	50 Pads/Bale	0
SPC 810 Boom	10' x 8"	4 Booms/Bale	10
SPC 510 Boom	10' x 5'	4 Booms/Bale	10
SPC 5110 Boom	10' x 5' (DBL Boom)	4 Booms/Bale	0
SPC 10 Pillow	14" x 25"	10 Pillows/Bale	0
SPC 1900 Sweep	17" x 100'	1 Sweep/Bale	15
SPC 150 Blanket	38" x 144' x 3/8"	1 Blanket/Bale	0
SPC 152 Blanket	19" x 144' x 3/8"	2 Blankets/Bale	6
SPC 27 Particulate		1 Bag/Bale	0

SORBENT INDUSTRIAL RUG & SUPER SIR			
NAME	SIZE	PACKING	QUANTITY
Sir 36 Rug	36" x 300'	1 Rug/Bale	0
Sir 18 Rug	18" x 300'	2 Rugs/Bale	0
Sir 001 Pads	18" x 18"	100 Pads/Bale	0

COBRA COIL			
NAME	SIZE	PACKING	QUANTITY
CC 400 Coils	3" x 48" Long	12 Coils/Box	0

SPC UNIVERSAL PLUS			
NAME	SIZE	PACKING	QUANTITY
UN 915 Pillow	9" x 15"	16 Pillows/Bag	10
Oil Snare		1 Snare/Box	6
Plastic Sheeting	20' x 100'	1 Roll/Box	5
Plastic Bags		Bags	500
Steel overpack drums	65 gallon	Drum	4
Poly overpack drums	65 gallons	Drum	2
Open head steel drum	55 gallon	DOT approved Drum	50

SPC UNIVERSAL PLUS (continued)			
NAME	SIZE	NUMBER	QUANTITY
Coveralls, Tyvek	Assorted		12
Coverall, Saranyx	Assorted		20
Respirator cartridges	Assorted	Pair	50
Rubber boots (heavy duty)	Assorted	Pair	50
Rubber gloves (heavy duty)	Assorted	Pair	50
Water soluble industrial cleaning fluid		Gallons	200
Industrial solvent		Gallons	55
Industrial scrub brushes			5
Industrial squeegees			4
Dip nets (spill equipment)			4
Tyvek hoods			20
Clear PVC booties		Pair	10

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, including but not limited to:

- Fla. Stat. Chapter 403; § 403.031(12); § 403.061; § 403.088; § 403.121; § 403.131; § 403.161(1)(a), (b); § 403.182; § 403.412; § 403.413; § 403.855
- Fla. Stat. § 373.400 series (Part 4); § 373.430(1)(a), (b)
- Fla. Stat. § 386.041(1)
- Fla. Stat. § 387.07, 08
- Regulations at FAC 62-65

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

The training of all appropriate operating personnel (managers, supervisors and field technicians) 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. Training includes periodic familiarization with the plan and training commensurate with their responsibilities to prepare them in carrying out their job responsibilities in a prompt and efficient fashion. Employees with USDOT responsibilities receive hazardous materials training at least every three years.

Since Cliff Berry Inc. also offers a contract service of twenty-four (24) hour oil spill response, all response personnel (managers, supervisors and field technicians) receive invaluable on the job training responding to real spill events. This practical application of oil spill mitigation techniques supplements 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 that 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 and the Department of Transportation.

The following 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 & USDOT HazMat)	POST-EMERGENCY CLEANUP (OFF-SITE)
<p>Training is dependent upon responsibilities and the level of response</p> <p>1. First Responder Operations Level (29 CFR 1910.120 (q)(6)(ii))</p> <p>Personnel who respond to releases or potential releases of hazardous substances as part of the initial response to the site for the purpose of protecting nearby persons property, or the environment from the effects of the release are trained to respond in a definitive fashion without actually trying to stop the release. Their function is to contain the release from a safe distance, keep it from spreading and prevent exposures.</p> <p>2. Hazardous Materials Technician 29 CFR 1910.120 (q)(6)(ii)</p> <p>Personnel who respond to releases or potential releases for the purpose of stopping the release assume a more aggressive role than a first responder at the operations level in that they approach the point of release in order to plug, patch or otherwise stop the release of a hazardous substance.</p> <p>Personnel responding to an emergency off site receive at least 24 hours of training equal to the first responder operations level and have additional competencies as outlined in 29 CFR 1910.120 (q)(6)(iii)(A)-(I).</p> <p>3. Hazardous Material Specialist 29 CFR 1910.120 (q)(6)(iv)</p> <p>Personnel who respond with and provide support to hazardous material technicians have a more specific knowledge of the various substances they may be called upon to contain. They receive at least 24 hours of training equal to the technician level and have additional competencies as outlined in 29 CFR 1910.120 (q)(6)(iv)(A)-(I).</p> <p>4. On Scene Incident Commander 29 CFR 1910.120 (q)(6)(V)</p> <p>Personnel receive at least 24 hours of training equal to the first responder operations level and have additional competencies as outlined in 29 CFR 1910.120 (q)(6)(v)(A)-(F).</p> <p>5. Refresher Training 29 CFR 1910.120 (q)(6)(I)</p> <p>Personnel who are trained in accordance with paragraph (q)(6) shall receive annual refresher training of sufficient content and duration to maintain their competencies or shall demonstrate competency in those areas at least yearly.</p> <p>6. USDOT Hazardous Materials 49 CFR 130, 172, 173 & 177</p> <p>Personnel who are trained in accordance with the sections noted above shall receive refresher training of sufficient content and duration to maintain their competencies or shall demonstrate competency in those areas at least every three years.</p>	<p style="text-align: center;">Personnel OSHA Instruction CPL-2-2.5(11/05/99)</p> <p>1. General and Occasional Site Workers 29 CFR 1910.120(e)(3)</p> <p>For a high magnitude of risk job, 40 hours of initial training and three days of supervised field experience under the direct supervision of a trained, experienced supervisor. Annual 8 hour refresher training.</p> <p>For a limited task or fully characterized area worker, 24 hours of initial instruction and the minimum of one day actual field experience under the direct supervision of a trained, experienced supervisor. Annual 8 hours of refresher training.</p> <p>2. Management and Supervisor 29 CFR 1910.120(e)(4)</p> <p>40 hours of initial training, three days of supervised field experience and at least eight additional hours of specialized training at the time of job assignment on such topics as, but not limited to the employer's safety and health program and the associated employee training program.</p> <p>3. Refresher Training 29 CFR 1910.120(e)(8)</p> <p>Personnel specified in 1. and 2. above shall receive 8 hours of refresher training annually and any critiques of incidents that have occurred in the past year that can serve as training examples of related work, and other relevant topics.</p> <p>4. Equivalent Training 29 CFR 1910.120(e)(9)</p> <p>Employers who can show by documentation or certification that an employee's work experience and/or training has resulted in training equivalent to the training required in 1 & 2 above, shall not be required to prove the initial training requirements. Employer shall provide a copy of the certification or documentation to the employee upon request.</p>
	<p style="text-align: center;">POST-EMERGENCY ON SITE</p> <p>1. Site Employees, Management and Supervision 29 CFR 1910.120 (q)(11)(ii)</p> <p>Employees are trained according to 29 CFR 1910.38(a) emergency action plan; 1910.34 respiratory protection; 1910.1200 hazard communication and other training made necessary by the task.</p> <p>2. Refresher Training 29 CFR 1910.38 (a)(5)(iii)(A)-(C)</p> <p>Emergency plan training is required initially with the plan is developed, whenever the employee's responsibilities or designated actions under the plan change, or whenever the plan is changed.</p> <p style="text-align: center;">29 CFR 1910.120(h)</p> <p>Employers shall provide employees with information and training on hazardous chemicals in their work area at the time of initial assignment, and whenever a new hazard is introduced into their work area.</p>

**OPA 90
PREP TRIENNIAL DRILL SCHEDULE**

Triennial Drills must include the following exercises: (1)

Terminal and Pipeline Drills

DRILL TYPE	FREQUENCY	DRILLS 3 YR PERIOD	AGENCY	INITIATING AUTHORITY
QI Notification	Quarterly	12	USEPA, USCG RSPA (6)	Facility Response Team/OSRO (6)
Response Team Notification	Quarterly (3)	12 (5)	RSPA	Facility Response Team/OSRO
Equipment Deployment	Semi-Annual (4)	6 (1)	USEPA, USCG	Facility Response Team/OSRO
Exercise Entire Response Plan	All Components Every 3 years	1	USEPA, USCG RSPA	Facility Response Team/OSRO

Corporate Response Team Drills

Table Top Exercise	Annual	1	USEPA, USCG	Corporate Team/OSRO
Unannounced Equipment Deployment	When Announced	None	USEPA, USCG	Facility Team/OSRO
Area Exercise	When Announced	20 (2)	USEPA, USCG	Facility and/or Corporate Team/OSRO

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

FACILITY EMERGENCY

Name of Facility: Fort Pierce Facility
Type of Facility: Oily Wastewater Transfer Facility
Location of Facility: 400 Angle Road
Fort Pierce, FL 34946

Name and Address of Owner or Operator:

Name: Cliff Berry, Inc.
Address: PO Box 13079
Fort Lauderdale, FL 33316

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

Name: Cliff Berry II
Title: CEO

MANAGEMENT APPROVAL

The individuals designated as Primary Emergency Coordinator, or in the absence of the Primary Emergency Coordinator the Back-up Emergency Coordinators, are authorized to commit the resources needed to carry out this plan.

Signature 

Name: Cliff Berry II
Title: CEO

Review and Update

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

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

Emergency Response Arrangements

- | | | |
|----|--------------------------------|-----------------------------------|
| 1. | Fire Department: | St. Lucie County Fire Department |
| 2. | Police Department: | St. Lucie County Sheriff's Office |
| 3. | Hospital: | Lawnwood Regional Medical Center |
| 4. | Emergency Response Contractor: | Cliff Berry, Inc. |

EMERGENCY COORDINATORS

Emergency Coordinators have the authority to commit resources to fully implement the Contingency Plan to response closure.

1. Primary Emergency Coordinator

Name: Paul Meding

Title: Area Manager – Port Canaveral, Fort Pierce and Orlando

Address: 3404 S.W. Catskill Drive
Fort Pierce, FL 34953

Phone: Office: (772) 466-4063
Home: (772) 879-0128
Cell: (772) 519-6015

2. Back-up Emergency Coordinator

Name: John Katzor

Title: Assistant Facility Manager

Address: 1316 Roulette Street
Sebastian, Florida 32958

Phone: Office: (772) 466-4063
Home: (772) 589-2258
Cell: (772) 201-4407

3. Back-up Emergency Coordinator

Name: Steve Collins

Title: ESOH Director

Address: 4871 NE 2nd Ave
Fort Lauderdale, FL 33334

Phone: Office: (954) 763-3390
Home: (954) 594-3873
Cell: (954) 594-3873

Fort Pierce Fax Number: (772) 466-3507

24 Hour Emergency Number: (800) 899-7745

Emergency Procedures – Responsibilities of the Emergency Coordinator or Designee

1. Activate the Facility alarm/communication system to notify all facility personnel by:
 - a. Announce the emergency situation using cellular phones.
 - b. Notify facility personnel by word of mouth.
2. Notify appropriate State and Local Agencies with designated response roles if their help is needed. In the case of fire or explosion:
 - a. Call 911 to notify the fire department.
3. Identify the character, exact source, amount and extent of any released materials. This may be done by observation, review of facility records or chemical analysis.
4. Assess possible hazards to human health of the environment that may result from the release, fire, or explosion. This assessment must consider both direct and indirect effects of the release, fire or explosion. If assessment indicates that evacuation of local areas may be advisable, immediately notify appropriate local authorities. Be available to help local authorities to decide whether local area should be evacuated.
5. Notify immediately the government official designated as the On Scene Coordinator (OSC) 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 the material(s) involved,
 - e. The extent of injuries, if any, and
 - 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 material or material that results from a release, fire or explosion. In the affected area(s) of the facility make sure that no waste or used oil that may be incompatible with the release material is recycled, treated, stored or disposed of until clean-up procedures are completed. All emergency equipment listed in the contingency plan need to be cleaned and fit for its intended use before operations are resumed.

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

Requirements for Notification

1. Name and telephone number of person making the notification
2. Name and address of the facility
3. Type and time of incident
4. Name and quantity of the material 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. See list of Emergency Coordinators in this section.
8. Wait for the other party to hang up – do not hang up first.

Emergency Contact Phone Numbers

1. Primary Emergency Contact Person – Paul Meding (772) 519-6015
Office Phone: (772) 466-4063
Office Address: 400 Angle Road, Fort Pierce, FL
Home Address: 3404 S.W. Catskill Drive, Fort Pierce, FL
Secondary Emergency Contact Person – John Katzor (772) 201-4407
Office Phone: (772) 466-4063
Office Address: 400 Angle Road, Fort Pierce, FL
Home Address: 1316 Roulette St. Sebastian FL 32958
2. Fire 911
St. Lucie County Fire Department (772) 621-3400
3. Police 911
St. Lucie County Sheriff's Office (772) 462-7300
4. Ambulance 911
5. Nearest Emergency Medical Facility
Lawnwood Regional Medical Center
1700 S. 23rd Street, Fort Pierce, FL 34950 (772) 461-4000
6. Nearest Hospital
Lawnwood Regional Medical Center
1700 S. 23rd Street, Fort Pierce, FL 34950 (772) 461-4000
7. National Response Center 1(800) 424-8802
8. Federal – U.S. EPA, Region IV 1(404) 562-8357
9. State – Florida DEP 1(561) 681-6600
Emergency Response 1(800) 320-0519
10. Local – St. Lucie County Dept. of Environmental Resources (772) 462-2526
11. Chemtrec 1(800) 424-9300
12. U.S. Coast Guard (772) 461-7606
13. 3E Company 1(800) 360-3220

GENERAL RESPONSIBILITIES

Personnel Assignments

A. Coordinator (Emergency Coordinator)

- a. Paul Meding (Leader)
- b. Steve Collins (Back-up)
- c. John Katzor (Back-up)

B. Communications

- a. Paul Meding (Leader)
- b. Steve Collins (Back-up)
- c. John Katzor (Back-up)

C. Evacuation

- a. Paul Meding (Leader plant and office)
- b. John Katzor (Back-up plant and office)

D. Emergency Situation

- a. Emergency assessment
 - i. Steve Collins (Leader)
 - ii. Paul Meding (Back-up)
 - iii. John Katzor (Back-up)
- b. Spill containment
 - i. Paul Meding (Leader)
 - ii. John Katzor (Back-up)
 - iii. Steve Collins (Back-up)

E. Emergency Team

- a. Fire fighting and spill containment
 - i. Paul Meding
 - ii. John Katzor

F. First Aid

- i. Paul Meding
- ii. 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 operation. In the event the Communication Leader is out of the office the coordinator's first back-up 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 Emergency Coordinator is out of the office, then the Communication Leader becomes the Emergency Coordinator.
- C. Evacuation Leader: Responsible for guiding personnel to staging area. Makes sure that all personnel are out of the office in an evacuation. Assists coordinator in his/her tasks. Conducts head count at the staging area.
- D. First Aid Provider: Responsible for cardio pulmonary resuscitation and first aid to employees in the case of accidents.

FIRE RESPONSE

Fire Control Systems and Equipment

1. All plant operation personnel have cellular phones so that they are in constant communication with each other at all times.
2. Fire control equipment consists of:
 - a. Two dry chemical fire extinguishers are located in the office and warehouse. They are inspected and certified (tagged) on an annual basis.

Emergency Procedures

Fire

1. Upon initial sighting, notify all personnel via cellular phones and notify the Fire Department immediately by calling 911. If fire is in its incipient stage, respond with fire extinguishers.
2. Immediately alert emergency coordinator by best available means.
3. Emergency coordinator will assess danger and will initiate response to fire, shut down procedure, and evacuation, as necessary.
4. All non-essential personnel should evacuate as soon as the alarm sounds.
5. Emergency personnel will be given the following information in order to make reports:
 - 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 the material(s) involved,
 - e. The extent of injuries, if any, and
 - f. The possible hazards to human health or the environment outside the facility.
6. If trapped by a fire in area:
 - a. Close all doors between you and the fire and seek alternate exit including breaking windows or walls, and if not available,
 - b. Seal all door cracks and vents the best you can,
 - c. Use the telephone to call the fire department and give your situation, and
 - d. Sit on the floor calmly as far away as possible from the fire.

Emergency Evacuation

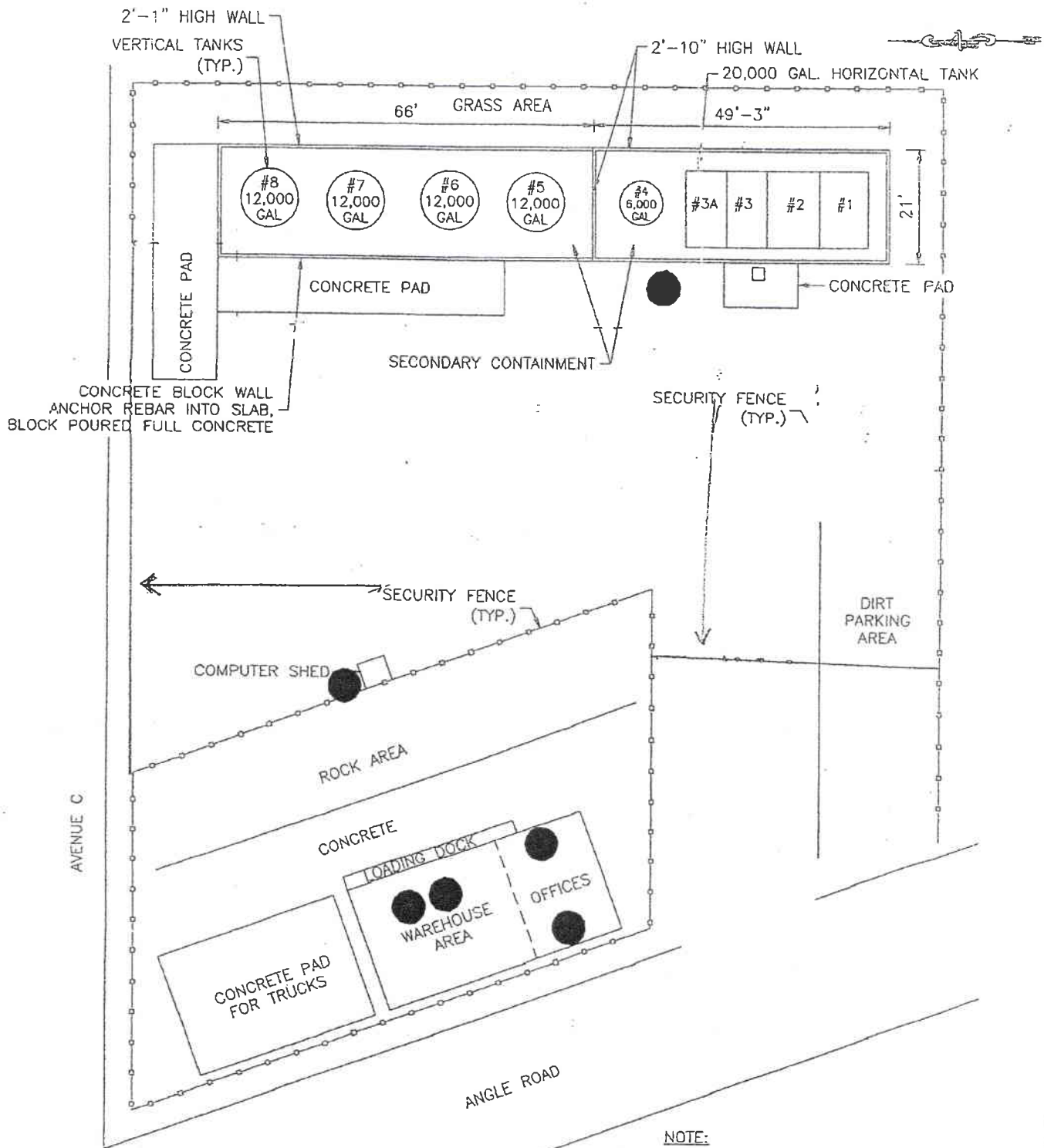
- ◆ Upon encountering fire or smoke immediately alert the Coordinator, sound the alarm and commence evacuating the plant, property and office areas.
- ◆ Depending on the location of the emergency, personnel should evacuate via the front or rear of the building and proceed to the staging area.
 - The staging area at this facility is at the front gate to the main parking lot.
- ◆ CBI management, under direction from the Fire Chief, will permit re-entry into the building after resetting the fire alarm. At that time the emergency coordinator will instruct CBI personnel and all tenants to return to their office.

Shutdown of Operation

- ◆ Shut down all pumps or other source, if it can be done safely
- ◆ Close man ways and access ports to tanks and rail cars, as appropriate,
- ◆ Close all valves if it can be done safely
- ◆ Remove vehicles from the site if it can be done safely,
- ◆ Shut down power to product movement areas,
- ◆ Close warehouse doors after confirming employees have evacuated,
- ◆ Open perimeter access gate for emergency crew,
- ◆ Move fire extinguishers to the location for the emergency crews,
- ◆ All nonessential personnel are to evacuate to the premises immediately. Personnel should report to the staging area so they can be counted.
- ◆ Plant personnel will provide security for the site until emergency crews arrive, and
- ◆ UNDER NO CIRCUMSTANCES IS ANYONE TO ENDANGER THEMSELVES OR OTHERS IN ORDER TO PROTECT EQUIPMENT OR PRODUCT. IF YOU ARE IN DOUBT SACRIFICE THE EQUIPMENT AND 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 is unsuccessful, do not attempt a second try – EVACUATE.
- ◆ Attempts at fire fighting should only be made during the fire's incipient stage.
 - Only hand held portable fire extinguishers will be used by company employees when responding to fires. No hose lines will be used by company employees.
 - Company employees will not attempt to extinguish small or large fires with the potential to change rapidly, for example:
 - Pump seal fires on a pressurized system, or
 - Ground fires in excess of 100 square feet in a congested process area.



NOTE:

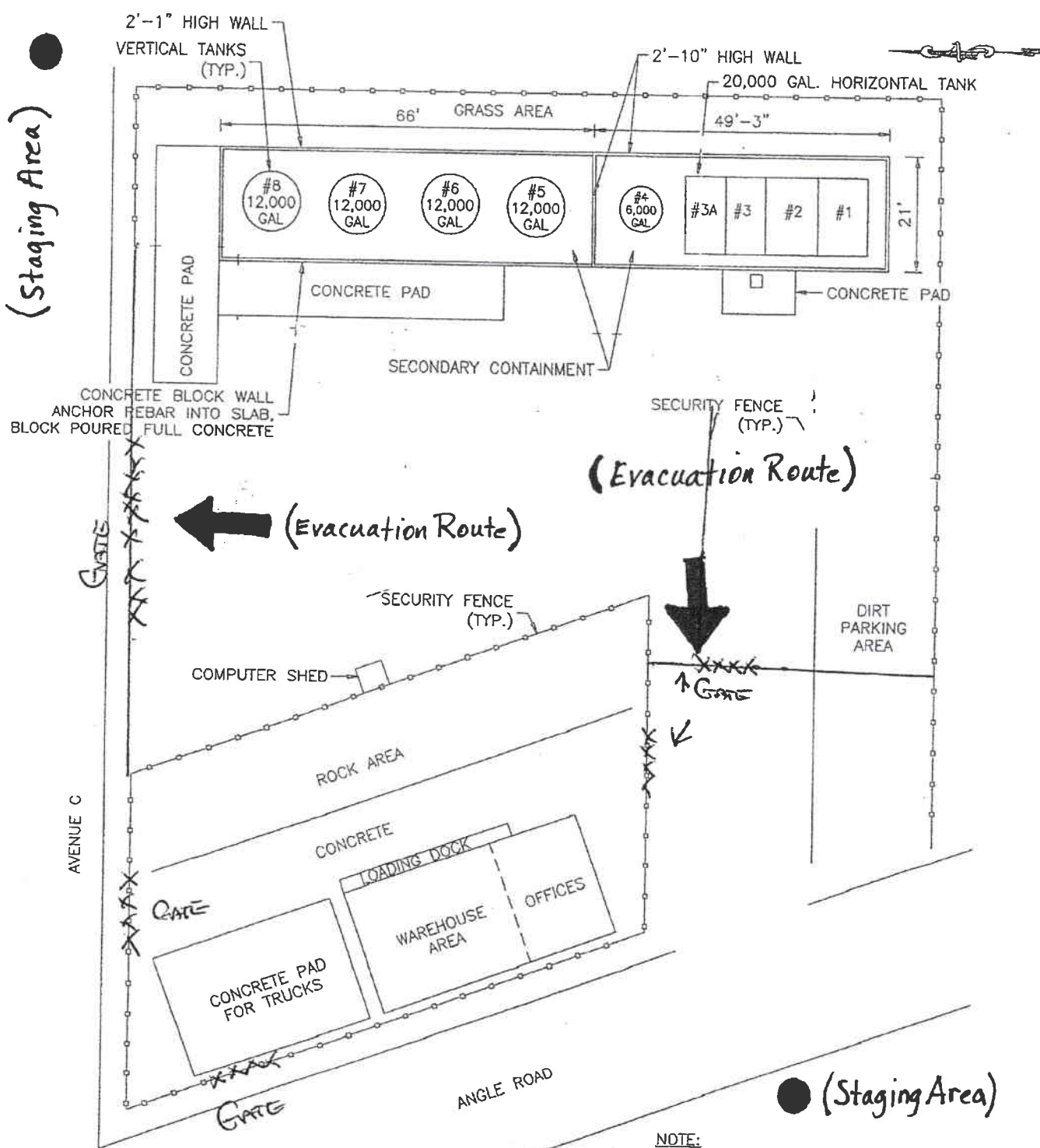
TANKS #1, #2, #3, AND #3A IS A SINGLE HORIZONTAL CYLINDRICAL PARTITIONED UNIT ON A SADDLE.

● Location of Fire Extinguishers

REVISED: 5/21/15

D.M. AMBROSE, P.E. FLORIDA REGISTRATION NO. 12031	SCALE: N.T.S. DATE: 04/15	D.M. AMBROSE, CIVIL ENGINEER CONSULTING ENGINEER P.O. BOX 680 • FORT PIERCE, FLORIDA 34945 PHONE: 888-333-3333 • FAX: 888-333-3334	CBI FORT PIERCE FACILITY
	DRAWN BY: RDW CHECKED BY: DWA DESIGNED BY: DWA		SITE PLAN SKETCH
SEAL	SHEET 1 OF 4		

(Staging Area)



NOTE:

TANKS #1, #2, #3, AND #3A IS A SINGLE HORIZONTAL CYLINDRICAL PARTITIONED UNIT ON A SADDLE.

REVISED: 5/21/15

D.M. AMBROSE, P.E. FLORIDA REGISTRATION NO. 12031	SCALE: N.T.S.	D.M. AMBROSE, CIVIL ENGINEER CONSULTING ENGINEER P.O. BOX 2800, FORT PIERCE, FL 34945 PHONE: 888-644-6444	CBI FORT PIERCE FACILITY
	DATE: 5/1/15		
	DRAWN BY: RGW		SITE PLAN SKETCH
	CHECKED BY: DSA		
DESIGNED BY: DSA	SHEET 1 OF 4		

SEAL

EXPLOSION RESPONSE

Bomb Threat Procedure

1. Purpose:
 - a. To provide for the orderly gathering of information during a potentially stressful situation.
2. Responsibility
 - a. 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. Safety
 - a. Remain calm. This will allow the maximum amount of information to be exchanged. Do not antagonize the other party.
4. Procedure – Handling the Call
 - a. Try to keep the caller on the line.
 - b. Try to alert office mates to notify the Emergency Coordinator to come to you
 - c. Make notes and COMPLETE THE BOMB THREAT CALL CHECKLIST
 - d. Get specific information on what is going to happen.
 - i. When will it go off?
 - ii. Where is it placed?
 - iii. What does it look like? Describe it.
 - iv. When was it put there?
 - v. How do you know about this?Note: Ask caller to repeat the information, if you did not get it all.
 - e. Take notes on additional information about the caller:
 - i. Name
 - ii. Age
 - iii. Sex
 - iv. Mental condition – joking, angry, etc.
 - v. General condition – calm, frantic?
 - vi. Voice characteristics – accent (hint of ethnicity?), speech defect, slurred?

- f. What background noises are present?
 - i. Music?
 - ii. Trucks?
 - iii. Freeway?
 - iv. Trains?
- g. Show your notes to Emergency Coordinator
 - i. If the threat is considered genuine the Emergency Coordinator will notify the local police (dial 911).
 - ii. Shut down and evacuate the plant. Refer to the evacuation procedures in Section 11. Move the staging area as needed if it is in conflict with the described location of the device.
 - iii. If there is time and a search can be performed safely, organize a search with a minimum of employees. Stop the search and evacuate thirty (30) minutes prior to scheduled detonation.

5. Search – Overt type

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

- a. Begin the search around the outside of each building and work inward. The employees most familiar with a building should search that building.
- b. Inside each building, begin along the outside walls and work to the center. Ground floors first then upper floors.
- 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 Emergency Coordinator. **DO NOT ATTEMPT TO HANDLE OR DISTURB ANY SUSPECTED BOMB.** Write on a piece of paper any information that would identify the suspicious object (size, type of container) and its exact location. Also note the route of egress from the object.
- f. If one suspected bomb is located, continue the search, if it appears this can be done reasonably safely, until completed. More than one device may have been set.

- g. Open all doors and windows in the building and evacuate to a minimum of 300 feet. This may entail moving the staging area.
- h. The employee in charge (Emergency Coordinator or other higher authority) and the person receiving the call should meet with the police when they arrive (however, do not hang up on the caller if they are still on the line.) Tell the police the exact location of any suspicious objects and the egress routes from the object.
- i. In the event of detonation activate the emergency response plan. See section 9.
- j. Do not return to the building or location until the “All Clear” is received from competent authority. See Section 13 for “All Clear” procedures.

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 directed to and handled by the Communications Leader. If the Communications Leader is not available, take a number and state that a return call will be made.

Bomb Threat Call Checklist

Questions to Ask

1.

2.

3.

4.

5.

6.

7.

8.

Exact Wording of Threat

When is the bomb going to explode?

Where is it right now?

What does it look like:

What kind of bomb is it?

Did you place the bomb?

Why:

What is your address?

What is your name?

Sex of caller _____

Age _____

Race _____

Length of call _____

Caller's Voice:

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

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

Background sounds:

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

Threat Language

<input type="checkbox"/> Well spoken (educated)	<input type="checkbox"/> Irrational
<input type="checkbox"/> Message read by threat maker	<input type="checkbox"/> Incoherent
<input type="checkbox"/> Foul language	<input type="checkbox"/> Tapered

Report call immediately to Emergency Coordinator

If threat is considered valid DIAL 911

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

Person receiving call _____ Position/Title: _____

Phone number call received on: _____

Phone call taped: ____ Yes ____ No.

Contact phone system administrator to determine if other details can be retrieved from the phone system, such as threat maker's originating phone number _____.

Remarks: _____

End of Bomb Threat Call Checklist

ALL CLEAR

All Clear Procedure

The only people allowed to issue the “All Clear” are:

- ◆ The Emergency Coordinator
- ◆ The Communication Leader

Before an “All Clear” can be issued the following conditions must be met:

- ◆ No readily apparent dangers to life or health can be present (not IDLH).
- ◆ If outside emergency response personnel (fire department, police) have been involved, they must also give the “All Clear”
- ◆ This information can be communicated verbally to all employees. If employees have been sent home the Communication Leader will pass the “All Clear” through the best available means.

Once the “All Clear” has been given (by the Communication Leader, Fire Chief, Police) only then will CBI personnel be allowed to return to the plant, property or facility. Entry to the facility will be led by the Emergency Coordinator.

If additional work is needed prior to reoccupying the plant, property or facility, a team will be assembled to conduct clean-up or other work. The team will follow all prescribed safety procedures, including personal protective equipment (PPE), necessary to perform the task, which may include:

- ◆ Hard hat
- ◆ Safety glasses
- ◆ Safety shoes (reinforced toe)
- ◆ Respirator with appropriate cartridge
- ◆ Coveralls
- ◆ Air monitor suitable for the conditions

Note: No CBI employee will enter the space if the conditions are Immediately Dangerous to Life and Health (IDLH) or if any life support apparatus is required for entry.

It is the responsibility of the Emergency 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 (e.g. do not send the emergency responders away if hazardous conditions persist.)

MEDICAL EMERGENCY

Medical Emergency Procedure

- ◆ Initial report is to be made to the Facility Manager or the Operations Manager
- ◆ An assessment will be made as to the severity of the incident determining if medical assistance it to be called. In general if the employee is unable to walk on his/her own, he/she is to be kept at the scene while an ambulance is called.
- ◆ If the incident does not require an ambulance the employee is to be transported to the applicable medical facility by supervisory personnel. Details of the incident along with other information such as a Material Safety Data Sheet (MSDS) can be provided to medical personnel. The supervisor will remain at the facility until a report on the employee's condition can be obtained.
- ◆ At least one office or plant personnel are to be trained in First Aid and CPR if the facility is not within a short response time from emergency response personnel. This training is to be used until relieved by rescue personnel. See Section 9 for a phone list.

Rescue

Rescue operations are to be performed by outside emergency response 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 or health.

- ◆ All rescues will be directed by the Emergency Coordinator.

Rescue Criteria

- ◆ Rescue is to be attempted when the location of the employee is known.
- ◆ Rescue will not be attempted when the structure is involved in a fire.
- ◆ Rescue activities involved with a product release will fall within the parameters of this SPCC plan.
- ◆ No rescue efforts are to be made with less than three employees. On 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 or other secure means. If a hazardous atmosphere is present only the employee remaining outside the hazardous environment will be tasked with communications, and if a choice exists, by means of an intrinsically safe radio.

INCLEMENT WEATHER

Inclement Weather and Natural Disaster

1. In the event of severe inclement weather (hurricane, electrical storm, tornado) the Emergency Coordinator will make the assessment of the danger.
2. If the assessment is not severe, operations may simply be suspended until the storm passes. The Emergency Coordinator will give a verbal "All Clear" to employees once the inclement weather has passed. This covers incidents such as thunder storms and sporadic heavy rains which interfere with safe operations. During these times shelter will be sought in the plant and main offices.
3. If the assessment is severe, the Emergency Coordinator will discuss the assessment with senior management, and as a result, notify the Communication Leader to cancel the work day.
4. If the work day has not started the Communication Leader will communicate with facility personnel, whether at home or in the office, and inform them through the best available means.
5. If an order to evacuate and go home is given facility personnel will check out with the Communication Leader prior to exiting the facility to ensure all are counted.
6. If the imminent danger does not permit for evacuation, inform the Emergency Coordinator (who will inform the Communication Leader), search for an inside corner or wall away from glass windows and product storage and remain there in a seated position until the danger has passed. In all cases the Communication Leader shall remain informed as to where facility personnel are staying during the inclement weather.

Preparations for Hurricanes

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

1. All items which are not securely anchored will be moved into the warehouse on a space available basis. These include empty containers, hoses, mats, pallets and then full containers, fittings, wall mounted extinguishers, boats, other loose objects and vehicles, in order of probability that these objects could become airborne.
2. All empty trailers are to be moved as far away from the building as possible. This includes all bulk trailers, box trailers, emergency response trailers, spill trailers and drum trailers.
3. If there is ample time to conduct preparations, secure plywood sheets and lag into the walls effectively covering windows.
4. Move as much equipment as possible above ground floor level. An ideal height for water sensitive items is five (5) feet.
5. All antennas or other high flying apparatus should be dismantled and lowered to ground level. Any removable parts should be placed inside the main building or warehouse.
6. All vertical storage tanks should be filled with at least one (1) foot of product or water to keep the tank from blowing over in hurricane force winds. This procedure only needs to be followed if hurricane winds in excess of 100 miles per hour are predicted.