



Port of Palm Beach District

One East 11th Street, Suite 400
Riviera Beach, FL 33404
Tel: (561) 842-4201 Fax: (561) 881-0367

Accidental Hazardous Material Release Response Action Plan

Effective Date: August 20th, 2005

Expiration Date: Until Amended

PURPOSE

The purpose of this plan is to provide steps and procedures that will be taken during an accidental Hazardous Material release or spill on the Ports property to reduce and eliminate the threat to personal safety and the surrounding environment.

GENERAL

The Port will follow the United States Coast Guard (USCG) policies and procedures established per 33 CFR 105, 153, and 154 (F), and the EPA standards for identifying and classifying hazardous materials. These operating procedures will govern the actions of the Port of Palm Beach District in the event of unintentional release of hazardous material from its authorized containment vessel and or container, or at an authorized transfer station.

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Record of Changes

[illegible]

Notification Procedures:

Depending on the nature of the spill incident, below is a list of numbers that will normally be called.

Emergency Contact Numbers (Must be called for any hazardous material discharge)

1. Local Emergency Organizations (First responders):
 - a. Riviera Beach Fire Department: 911
 - b. Riviera Police Department: 911
2. Main Security Gate: (561) 383-4144
3. U.S. Coast Guard Marine Safety Detachment Palm Beach (561) 848-8868 or 844-5030
4. National Response Center (800) 424-8802
5. US Coast Guard Miami Sector (Regional MSO) (305) 535-8701
6. Port Director (Director of Operations): (561) 383-4132 or (561) 779-1062 (Mobile)

Contact Numbers (Depending on circumstances of discharge)

7. Florida Power and Light (FPL): (561) 691-2815 & (561) 307-7196 (Mobile)
8. Tropical Shipping Hazardous Response Specialist: (561) 371-7596, 307-5426
9. Florida Sugar and Molasses Response Specialist: Sugar: (561) 844-2062
Molasses: (561) 848-3301
10. Palm Beach Pilots Assn. (561) 845-2628
11. Riviera Beach Marina (561) 842-7806
12. Cliff Berry Environmental Services Inc. (800) 899-7745 or (954) 763-3390 (Ft Lauderdale FL Office)
13. Tow Boat US (Cleanup and boom deployment operations) (561) 842-1525 or Ch. 16 VHF-FM.

Responsibilities:

1. Tenants Responsibilities:

It is the responsibility of every port tenant to have positive control of their leased property, their vessels, and equipment to ensure a clean and safe working environment is maintained. In the event of an emergency, it is the tenants responsibility to notify Port Operations and or Port Security of the nature, location, and extent (how much) hazardous material is spilled or released. Tenants will have an emergency hazardous material response action plan per 33 CFR 105, 153, and 154 in place and established for their respective areas, and made available to the port for coordination and review purposes.

2. Port Of Palm Beach District Responsibilities:

- a. Establish procedures to follow for the varying potential accidental hazardous material release scenarios present on the port.
- b. Provide training to port employees in the disciplines associated with emergency response actions for accidental hazardous material release and or spills.
- c. Make available clean up and response equipment to qualified personnel to respond to incident as required.
- d. Make available containment booms for each slip of the port and a method for expeditious deployment.

3. Actions:

- a. Upon report of a hazardous material spill/release, on duty security and operations officer will ensure that 911 is called to local fire department and emergency response units.
- b. On scene security and operations officers will determine wind speed and direction and secure a 300 foot security perimeter up wind of the incident and restrict access to this area until hazardous material response units arrive on scene. Assist as needed. Note: Area must be secured to any persons who are not part of the initial response team (Fire department, Coast Guard, until it is determined safe for unprotected access to the area.)
- c. Ascertain from a distance (300 ft up wind) the nature and type of material that has been released (using binoculars) sighting hazardous material placards.
- d. Record incident as per Information Discharge Form (Page 5)
- e. Deploy containment booms if circumstances warrant.
- e. Implement Port emergency evacuation if circumstances warrant.

4. Follow up:

- a. Coordinate and investigate cause of incident with local response teams.
- b. Review response actions and its effectiveness to mitigate damage and harm.
- c. Conduct hot wash briefing with all responders of the actions and events that occurred.
- d. Estimate total costs of the incident, (Response, cleanup, damage, etc...)

Information on discharge form:

(A) Reporting party

Name

Phones () -

Company

Position

Address

City

State

Zip

(B) Suspected responsible party

Name

Phones () -

Company

Organization Type:

Address

City

State

Zip

*** It is not necessary to wait for all information before calling NRC.
National Response Center_1-800-424-8802.**

Were materials Discharged (Y/N)?

Calling for Responsible Party (Y/N)

Incident Description

Source and/or Cause of Incident:

Date / Time:

Incident Address/Location:

Nearest City : Riviera Beach, Florida

Distance from City:

Storage Tank/Container Type:

Above ground (Y/N)

Below ground (Y/N)

Unknown

Facility Capacity

Tank Capacity

Latitude Degrees

Longitude Degrees

Materials

Discharge Unit or Quantity:

(Gals / Bbls) Discharged Material:

Quantity in Water

Response Action

Actions Taken to Correct or Mitigate Incident:

Impact

Number of Injuries

Number of Fatalities

Were there Evacuations (Y/N/U)?

Number Evacuated

Was there any Damage (Y/N/U)?

Damage in Dollars

Additional Information

Any information about the Incident not recorded elsewhere in the report

Notifications made: (Circle the calls made):

Riviera Beach Fire Department; Main Gate Security; USCG; Port Director (Operations); FPL; CBI;

Riviera Beach Marina; Palm Beach Pilots Assn; NRC;



A. Statement of Policy

It is a primary objective of Tropical Shipping to prevent hazardous material leaks and/or spills to avoid employee exposure to harmful concentrations of these substances and to prevent environmental damage to our equipment, property, and the environment. This will be accomplished through the utilization of acceptable practices for handling, storing, loading, unloading, and shipping of hazardous materials. When these practices fail, or other outside factors lead to a leak or spill of hazardous materials, qualified employee teams will be mobilized to control the initial incident and clean up spills within their capabilities. Outside emergency response contractors will be responsible for the cleaning up of spills and leaks outside the magnitude of our training and equipment.

B. Application of Policy

This policy applies to all Tropical Shipping employees in the United States, St. Thomas and St. Croix.

C. Objective

1. The company's objective is to provide safe, rapid response to emergencies involving leaks/spills of hazardous materials by creating and maintaining specialty, in-house teams trained to deal with hazardous materials emergencies.
2. The company's primary concern is the health and safety of our employees and others in our communities. Our secondary concern shall be to minimize the effect the leak or spill has on our surrounding environment.
3. After safety and environmental concerns are under control, protection and cleanup of company property shall be undertaken, and waste/cleanup materials shall be disposed of according to applicable regulations.

D. Definition

Leak/spill is defined as any unplanned or unapproved discharge of solid, liquid, or gas, that could adversely affect an employee's or the community's safety through contamination of air, water, soil, or through personal contact.

E. Emergency Response Team Organization & Training

1. Hazardous Materials Emergency Response Teams of trained employees will be formed in West Palm Beach, Miami, St. Thomas, and St. Croix.
2. The number of response teams at each location will vary based on workforce size.
West Palm Beach will maintain three teams, structured to represent common work areas as follows:
 - a) Cargo Handling (MLK Warehouse, Import, TL Rail)
 - b) Port Operations (Interchange, Stevedoring, Marine)
 - c) Support Operations (Chassis Maintenance, Container Repair, Automotive, Port Maintenance, Trucking, Security, Refrigeration, and Fleet Purchasing)

The Cargo Handling and Port Operations Teams will be the primary responders for cargo leak and spill incidents and will assist in other responses, as required.

The Support Operations Team will be the primary responder for equipment/vehicle/facility leak and spill incidents and will assist in other responses, as required.



Administration: Human Resources Policies

Emergency Response Procedures for Hazardous Materials

Miami, St. Thomas, and St. Croix will each have one team, comprised of employees from several work areas, to represent the work location.

3. All Emergency Response Team members who are selected to respond to releases or potential releases, for the purpose of stopping the release, or who will assume control of the incident scene beyond the first responder level, will initially receive a minimum of 32 hours of OSHA approved/certified training in leak and spill management. Annually, thereafter, members will receive a minimum of 8 hours refresher training.
4. Team members will meet annually to participate in continuing training.
5. All time spent by team members in training and spill response will be paid time.
6. All training will be coordinated by the Safety Department.
7. In the event of an incident, an incident commander will be established according to the order established in the section, On-Scene Incident Commander.
8. In addition to the Emergency Response Team, additional employees may be trained in basic spill management and the details of our First Responder procedures.

F. Emergency Response Team

1. The members of the Emergency Response Team are under the sole direction of the incident commander, in the event they are called upon to respond to an incident.
2. The members of the Emergency Response Team must be immediately released from their normal assigned duties to participate in an incident response.
3. All members of the Emergency Response Team established for an area will respond to incidents within their area when called upon to do so by the incident commander.
4. In the event an incident occurs in an area that is not a participant in the Emergency Response Team, the Incident Commander will select the team which is best trained to handle the particular type of incident involved.
5. Based on their knowledge of our response capabilities, and the extent of the liability associated with a particular incident, the incident commander has authority to appropriate additional company resources beyond the scope of the Emergency Response Team to bring an incident under control.
6. At no time shall employees put their own personal safety in jeopardy to protect physical property.
7. In the event outside support is needed in any Florida facility, **Cliff Berry Inc.** will be mobilized by calling the Emergency Response Hotline **1-800-899-7745**.

G. Emergency Response Team Responsibilities

1. First Responders

First responders are employees who are likely to witness or discover a release of hazardous materials and are trained to initiate the company's "Emergency Response Procedure for Hazardous Materials" as follows:

- a) Evacuate all persons from the spill and affected areas.
- b) Secure the spill in the affected area from accidental entry and disconnect any ignition sources.



Administration: Human Resources Policies

Emergency Response Procedures for Hazardous Materials

- c) Begin first aid treatment to exposed personnel, referring to labels and Safety Data Sheets for first aid procedures.
- d) Obtain the following information, if conditions permit:
 - 1) the trade name and chemical name of the substance and the identification number
 - 2) volume of spill (i.e. gallon, 5 gallons, drum, tank, etc.)
 - 3) hazards of substance (i.e. flammable, corrosive, toxic or reactive with water)
 - 4) other chemicals in the spill and affected areas
 - 5) whether the spill or leak is near a well, ditch, canal, or storm sewer
 - 6) determine the nature and extent of injuries, fire and damages
- e) Immediately report the leak/spill to their supervisor and/or the Safety Department so that a decision regarding what additional emergency action must be taken can be made. It is the responsibility of the department supervisor of the area in which the spill actually occurred to notify the Safety Department. An immediate report of a leak/spill is essential so response team efforts can be organized.
- f) Not allow anyone to re-enter evacuated areas until they are declared safe, and necessary equipment is restored to full working order.
- g) Refer all questions from news reporters to the office of the Director of Government and Public Affairs in Riviera Beach.
- h) Document all leaks/spills, using a Safety Incident Report form. It is important that this form be filled out completely so that the proper information can be passed on to regulatory agencies and disposal companies.

2. Hazardous Material Technician

Hazardous Material Technicians are Emergency Response Team members who assume a more aggressive role, and who will respond to releases for the purpose of containing, stopping the release, and performing site cleanup. Team members will be trained and required to:

- a) Interpret basic hazardous product information in order to make a risk assessment.
- b) Select and use appropriate protective equipment available for the type of incident.
- c) Use field survey instruments to identify the hazardous materials and/or perform risk assessment.
- d) Perform advanced control and containment operations with the resources and equipment available.
- e) Function in an assigned role in the Incident Command System.
- f) Be knowledgeable of the Local Emergency Planning Committee (LEPC) and local response procedures.
- g) Implement decontamination procedures.
- h) Develop a site safety and control plan.
- i) Refer all questions from news reporters to the office of the Director of Government and Public Affairs in Riviera Beach.



3. On-Scene Incident Commander

- a) The senior emergency response employee responding to an incident will become the individual in charge of a site-specific Incident Command System (ICS). All emergency responders and their communications shall be coordinated and controlled through the incident commander, assisted by the senior management representative present.
- b) The senior emergency response employee will be the most senior employee trained in emergency response procedures and who has working knowledge of the operations at the site. As more experienced and/or senior emergency responders arrive (Health, Safety and Environmental Manager, Safety Engineer, Coast Guard, Fire Department, outside HazMat contractor) the position will be passed up the line of authority.
- c) Tropical hierarchy of Incident Commanders is as follows:
 - 1) Safety Engineer
 - 2) Emergency Responders (Hazardous Materials Technicians)
 - 3) Directors
 - 4) Managers/Supervisors
- d) Tropical will relinquish the control of the Incident Command to outside agencies as required under the state and/or federal regulations (i.e., Fire Department, Coast Guard, HazMat contractor), and/or as dictated by the severity of the incident.
- e) Employees at this level will be trained and required to:
 - 1) Implement the company's Emergency Response Procedures for Hazardous Materials.
 - 2) Implement the company's incident command system.
 - 3) Understand the hazards and risks associated with employees working in chemical protective clothing.
 - 4) Identify, to the extent possible, all hazardous substances present, and address as required with a site analysis, maximum exposure limits, and determine the appropriate control and containment procedures to be utilized.
 - 5) Assure that the personal protection used is appropriate for the hazards to be encountered.
 - 6) Determine when a decreased level of protective clothing and/or respiratory protection will not result in hazardous exposures to employees.
 - 7) Limit the number of emergency response personnel at the emergency site (areas of potential or actual exposure to hazards) to those who are actively performing emergency operations.
 - 8) Secure additional company manpower or resources outside the emergency response team in order to mitigate or control the incident to alleviate or reduce the company liability/risk.
 - 9) Terminate emergency response activities if determined that further response may subject the team to Immediately Dangerous to Life and Health (IDLH) conditions.
 - 10) Implement appropriate decontamination procedures at the completion of the emergency operations.
 - 11) Coordinate and assure the disposal of all remaining hazardous materials/cleanup materials are completed according to applicable state and federal regulations.

- 12) Refer all questions from news reporters to the office of the Director of Government and Public Affairs in Riviera Beach.
- 13) Document all leak/spill, using a Safety Incident Report form. It is important that this form be filled out completely so that the proper information can be passed on to regulatory agencies and disposal companies.

H. Medical Care

For injuries requiring medical treatment beyond first aid, employees should refer to the Emergency Calling Procedures for their location. The following treatment facilities will be utilized for non-life-threatening or after-hours injuries:

West Palm Beach Area

Concentra Urgent Care

4455 Medical Center Way
West Palm Beach, FL 33407
561-881-0066

St. Mary's Medical Center

901 45th St.
West Palm Beach, FL 33407

Miami Area

Concentra Urgent Care

7800 NW 25th St., Ste 4
Doral, FL 33122
305-593-2174

Kendal Regional Medical Center

11750 SW 40th St.
Miami, FL 33175
305-223-3000

I. Reporting

The Safety Department must be contacted for any chemical spills, including hazardous waste, that enter a storm drain, contact soil, or potentially leave the site. The Safety Department will immediately notify the following agencies:

National Response Commission

1-800-424-8802

Florida Department of Environmental Protection

DEP State Watch Office
1-800-320-0519

Department of Transportation

Form F 5800.1
(Unless exempted per 49 CFR 171.16(d))



J. Disposal

All hazardous/non-hazardous waste must be properly disposed of in accordance with state and federal regulations. Waste generated from any chemical spill must be properly cleaned-up, neutralized, containerized in DOT-approved drums, and properly labeled. The hazardous/non-hazardous waste labels are located in the Central Accumulation Area near Shop 2 in the Port of Palm Beach.

K. Relationship to Other Policies

1. For details on Safety and Environmental Responsibility, see the Safety & Environmental Responsibility.
2. For details on our environmental program, see the Environmental Policy.
3. For details on our Emergency Calling Procedures, see the Emergency Calling Procedures for West Palm Beach and Miami.

Matthew King

From: Matthew King
Sent: Tuesday, March 3, 2020 2:10 PM
To: Srozier@rbpublicsafety.org
Cc: Chad Nelson
Subject: RE: notification of HazMat Waste Shipments
Attachments: PPB Tropical Map.pdf; Emergency Response Procedures for Hazardous Materials.pdf

Spencer,

It's a pleasure to e-meet you. I'm Matt King, Tropical Shipping's Health, Safety and Environmental Manager. In accordance with the federal and state hazardous waste regulations, Tropical Shipping is required to notify you of our facility's hazardous waste activities. Tropical Shipping is required to give local police, fire departments, hospitals, and state or local emergency response teams a layout of the facility, so they may become familiar with entrances to roads inside the facility, and possible evacuation routes. A copy of the facility layout is enclosed for your review and should be kept on file at your organization.

Tropical Shipping is also required to familiarize local hospitals with the properties of hazardous waste handled at the facility and the types of injuries or illnesses that could result from fires, explosions, or releases at the facility. Tropical Shipping deals with the following hazardous wastes:

- UN 1993 Waste Flammable Liquid N.O.S. (Isopropanol, Dimethylformamide) Class 3, PG II, FP 22.7 C
- UN1993 Waste Flammable Liquid N.O.S. (Isopropyl Ether, Acetone) Class 3, PG II, FP 12 C
- UN1993 Waste Flammable Liquid N.O.S. (Ethyl Acetate) Class 3, PG II, FP 11.7 C
- UN1993 Waste Flammable Liquid N.O.S. (Ethyl Acetate, Toluene) Class 3, PG II, FP 22.7 C
- UN1993 Waste Flammable Liquid N.O.S. (Isopropanol) Class 3, PG II, FP 22.7 C
- UN1993 Waste Flammable Liquid N.O.S. (Isopropyl Ether) Class 3, PG II, FP 12 C
- UN1993 Waste Flammable Liquid N.O.S. (Isopropyl Ether, Isopropyl Alcohol) Class 3, PG II, FP 12 C
- UN1993 Waste Flammable Liquid N.O.S. (Isopropyl Ether, Acetone) Class 3, PG II, FP 12 C
- UN1993 Waste Flammable Liquid N.O.S. (N-Methyl-2-Propolidone) Class 3, PG II, FP 22.7 C

These types of waste are flammable and have the potential to cause burns to employees in the event of an accidental release in which catches fire. A list of all the chemicals handled is maintained at the facility and a Safety Data/Technical Sheet for each can be supplied at your request.

We have also enclosed a copy of our Emergency Response Procedures. The plan is designed to minimize hazards to human health and the environment from fires, explosions or any unplanned sudden or non-sudden release of hazardous waste to the air, soil or surface water. Please review and retain this plan in your files in the event of an emergency.

Thank you for your cooperation in this matter. Should you have any questions or desire to visit the facility, please contact me at (561) 882-2556.

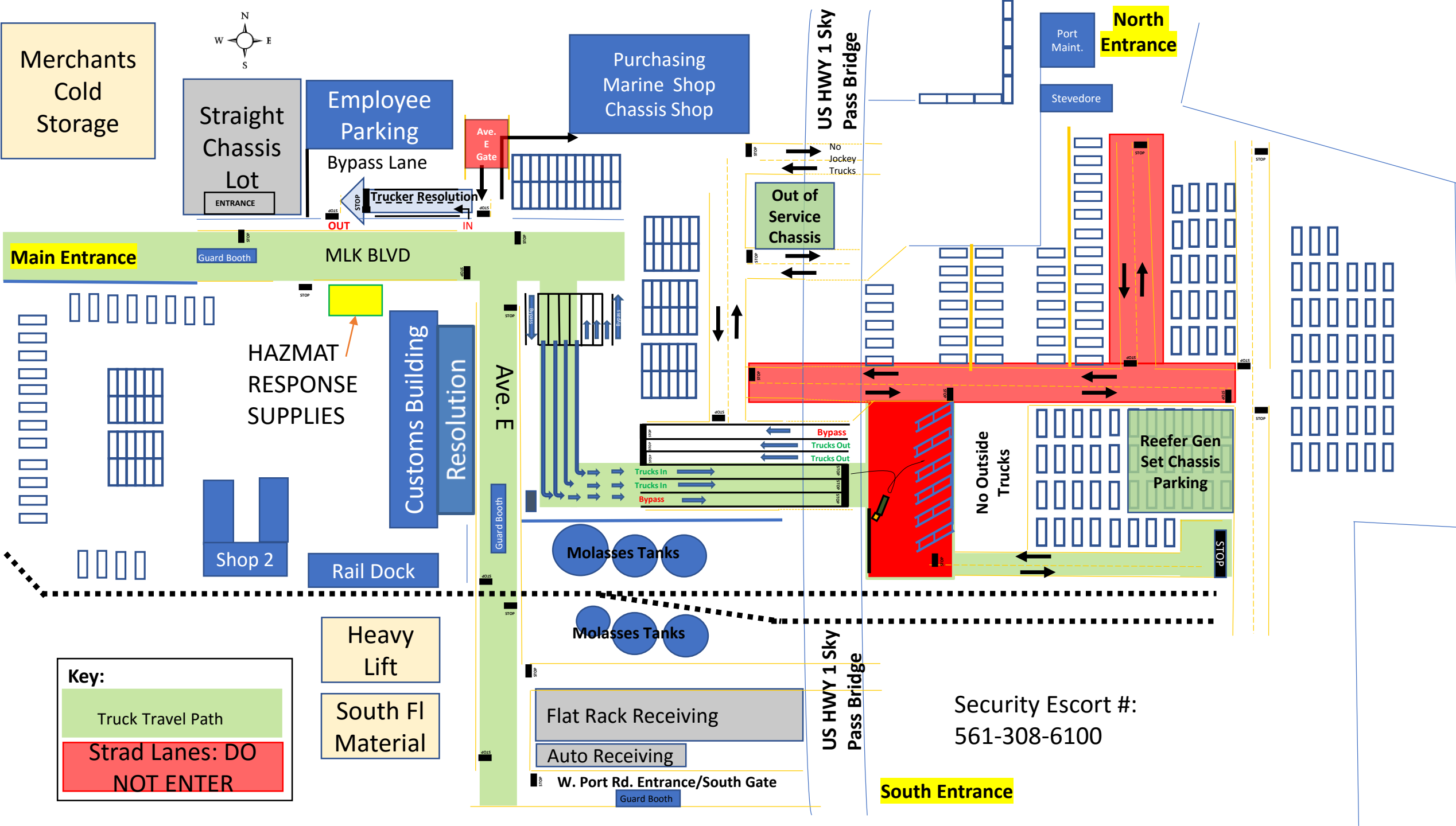
Sincerely,

Matthew S. King, CSP, SMS | Health, Safety & Environmental Manager | Tropical Shipping | Mailstop: MLK 01-12 | 501 Avenue P |
Riviera Beach, FL 33404 | Office: (561) 882-2556 | mking@tropical.com



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This information is intended to provide interpretative information in regard to the subject matter covered as a service to our clients and has been answered to the best of our ability based on the information provided to us. We do not guarantee the accuracy or completeness of any such interpretation or information, nor do we warrant that compliance with any advice we provide will guarantee compliance with any legal or regulatory requirements. Our statements or opinions do not convey legal interpretation and government authorities or legal counsel should be contacted for such a response.





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2. The company's primary concern is the health and safety of our employees and others in our communities. Our secondary concern shall be to minimize the effect the leak or spill has on our surrounding environment.
3. After safety and environmental concerns are under control, protection and cleanup of company property shall be undertaken, and waste/cleanup materials shall be disposed of according to applicable regulations.

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Administration: Human Resources Policies

Emergency Response Procedures for Hazardous Materials

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4. Team members will meet annually to participate in continuing training.
5. All time spent by team members in training and spill response will be paid time.
6. All training will be coordinated by the Safety Department.
7. In the event of an incident, an incident commander will be established according to the order established in the section, On-Scene Incident Commander.
8. In addition to the Emergency Response Team, additional employees may be trained in basic spill management and the details of our First Responder procedures.

F. Emergency Response Team

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2. The members of the Emergency Response Team must be immediately released from their normal assigned duties to participate in an incident response.
3. All members of the Emergency Response Team established for an area will respond to incidents within their area when called upon to do so by the incident commander.
4. In the event an incident occurs in an area that is not a participant in the Emergency Response Team, the Incident Commander will select the team which is best trained to handle the particular type of incident involved.
5. Based on their knowledge of our response capabilities, and the extent of the liability associated with a particular incident, the incident commander has authority to appropriate additional company resources beyond the scope of the Emergency Response Team to bring an incident under control.
6. At no time shall employees put their own personal safety in jeopardy to protect physical property.
7. In the event outside support is needed in any Florida facility, **Cliff Berry Inc.** will be mobilized by calling the Emergency Response Hotline **1-800-899-7745**.

G. Emergency Response Team Responsibilities

1. First Responders

First responders are employees who are likely to witness or discover a release of hazardous materials and are trained to initiate the company's "Emergency Response Procedure for Hazardous Materials" as follows:

- a) Evacuate all persons from the spill and affected areas.
- b) Secure the spill in the affected area from accidental entry and disconnect any ignition sources.



Administration: Human Resources Policies

Emergency Response Procedures for Hazardous Materials

- c) Begin first aid treatment to exposed personnel, referring to labels and Safety Data Sheets for first aid procedures.
- d) Obtain the following information, if conditions permit:
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 - 2) volume of spill (i.e. gallon, 5 gallons, drum, tank, etc.)
 - 3) hazards of substance (i.e. flammable, corrosive, toxic or reactive with water)
 - 4) other chemicals in the spill and affected areas
 - 5) whether the spill or leak is near a well, ditch, canal, or storm sewer
 - 6) determine the nature and extent of injuries, fire and damages
- e) Immediately report the leak/spill to their supervisor and/or the Safety Department so that a decision regarding what additional emergency action must be taken can be made. It is the responsibility of the department supervisor of the area in which the spill actually occurred to notify the Safety Department. An immediate report of a leak/spill is essential so response team efforts can be organized.
- f) Not allow anyone to re-enter evacuated areas until they are declared safe, and necessary equipment is restored to full working order.
- g) Refer all questions from news reporters to the office of the Director of Government and Public Affairs in Riviera Beach.
- h) Document all leaks/spills, using a Safety Incident Report form. It is important that this form be filled out completely so that the proper information can be passed on to regulatory agencies and disposal companies.

2. Hazardous Material Technician

Hazardous Material Technicians are Emergency Response Team members who assume a more aggressive role, and who will respond to releases for the purpose of containing, stopping the release, and performing site cleanup. Team members will be trained and required to:

- a) Interpret basic hazardous product information in order to make a risk assessment.
- b) Select and use appropriate protective equipment available for the type of incident.
- c) Use field survey instruments to identify the hazardous materials and/or perform risk assessment.
- d) Perform advanced control and containment operations with the resources and equipment available.
- e) Function in an assigned role in the Incident Command System.
- f) Be knowledgeable of the Local Emergency Planning Committee (LEPC) and local response procedures.
- g) Implement decontamination procedures.
- h) Develop a site safety and control plan.
- i) Refer all questions from news reporters to the office of the Director of Government and Public Affairs in Riviera Beach.



3. On-Scene Incident Commander

- a) The senior emergency response employee responding to an incident will become the individual in charge of a site-specific Incident Command System (ICS). All emergency responders and their communications shall be coordinated and controlled through the incident commander, assisted by the senior management representative present.
- b) The senior emergency response employee will be the most senior employee trained in emergency response procedures and who has working knowledge of the operations at the site. As more experienced and/or senior emergency responders arrive (Health, Safety and Environmental Manager, Safety Engineer, Coast Guard, Fire Department, outside HazMat contractor) the position will be passed up the line of authority.
- c) Tropical hierarchy of Incident Commanders is as follows:
 - 1) Safety Engineer
 - 2) Emergency Responders (Hazardous Materials Technicians)
 - 3) Directors
 - 4) Managers/Supervisors
- d) Tropical will relinquish the control of the Incident Command to outside agencies as required under the state and/or federal regulations (i.e., Fire Department, Coast Guard, HazMat contractor), and/or as dictated by the severity of the incident.
- e) Employees at this level will be trained and required to:
 - 1) Implement the company's Emergency Response Procedures for Hazardous Materials.
 - 2) Implement the company's incident command system.
 - 3) Understand the hazards and risks associated with employees working in chemical protective clothing.
 - 4) Identify, to the extent possible, all hazardous substances present, and address as required with a site analysis, maximum exposure limits, and determine the appropriate control and containment procedures to be utilized.
 - 5) Assure that the personal protection used is appropriate for the hazards to be encountered.
 - 6) Determine when a decreased level of protective clothing and/or respiratory protection will not result in hazardous exposures to employees.
 - 7) Limit the number of emergency response personnel at the emergency site (areas of potential or actual exposure to hazards) to those who are actively performing emergency operations.
 - 8) Secure additional company manpower or resources outside the emergency response team in order to mitigate or control the incident to alleviate or reduce the company liability/risk.
 - 9) Terminate emergency response activities if determined that further response may subject the team to Immediately Dangerous to Life and Health (IDLH) conditions.
 - 10) Implement appropriate decontamination procedures at the completion of the emergency operations.
 - 11) Coordinate and assure the disposal of all remaining hazardous materials/cleanup materials are completed according to applicable state and federal regulations.

- 12) Refer all questions from news reporters to the office of the Director of Government and Public Affairs in Riviera Beach.
- 13) Document all leak/spill, using a Safety Incident Report form. It is important that this form be filled out completely so that the proper information can be passed on to regulatory agencies and disposal companies.

H. Medical Care

For injuries requiring medical treatment beyond first aid, employees should refer to the Emergency Calling Procedures for their location. The following treatment facilities will be utilized for non-life-threatening or after-hours injuries:

West Palm Beach Area

Concentra Urgent Care

4455 Medical Center Way
West Palm Beach, FL 33407
561-881-0066

St. Mary's Medical Center

901 45th St.
West Palm Beach, FL 33407

Miami Area

Concentra Urgent Care

7800 NW 25th St., Ste 4
Doral, FL 33122
305-593-2174

Kendal Regional Medical Center

11750 SW 40th St.
Miami, FL 33175
305-223-3000

I. Reporting

The Safety Department must be contacted for any chemical spills, including hazardous waste, that enter a storm drain, contact soil, or potentially leave the site. The Safety Department will immediately notify the following agencies:

National Response Commission

1-800-424-8802

Florida Department of Environmental Protection

DEP State Watch Office
1-800-320-0519

Department of Transportation

Form F 5800.1
(Unless exempted per 49 CFR 171.16(d))



J. Disposal

All hazardous/non-hazardous waste must be properly disposed of in accordance with state and federal regulations. Waste generated from any chemical spill must be properly cleaned-up, neutralized, containerized in DOT-approved drums, and properly labeled. The hazardous/non-hazardous waste labels are located in the Central Accumulation Area near Shop 2 in the Port of Palm Beach.

K. Relationship to Other Policies

1. For details on Safety and Environmental Responsibility, see the Safety & Environmental Responsibility.
2. For details on our environmental program, see the Environmental Policy.
3. For details on our Emergency Calling Procedures, see the Emergency Calling Procedures for West Palm Beach and Miami.

Matthew King

Subject: FW: Notification of Hazardous Waste Shipments
Attachments: PPB Tropical Map.pdf; Emergency Response Procedures for Hazardous Materials.pdf

From: Matthew King
Sent: Tuesday, March 3, 2020 3:30 PM
To: Mark Johnson <mjohnson@rbpublicsafety.org>
Subject: Notification of Hazardous Waste Shipments

Captain Johnson,

It's a pleasure to e-meet you. I'm Matt King, Tropical Shipping's Health, Safety and Environmental Manager. In accordance with the federal and state hazardous waste regulations, Tropical Shipping is required to notify you of our facility's hazardous waste activities. Tropical Shipping is required to give local police, fire departments, hospitals, and state or local emergency response teams a layout of the facility, so they may become familiar with entrances to roads inside the facility, and possible evacuation routes. A copy of the facility layout is enclosed for your review and should be kept on file at your organization.

Tropical Shipping is also required to familiarize local hospitals with the properties of hazardous waste handled at the facility and the types of injuries or illnesses that could result from fires, explosions, or releases at the facility. Tropical Shipping deals with the following hazardous wastes:

- UN 1993 Waste Flammable Liquid N.O.S. (Isopropanol, Dimethylformamide) Class 3, PG II, FP 22.7 C
- UN1993 Waste Flammable Liquid N.O.S. (Isopropyl Ether, Acetone) Class 3, PG II, FP 12 C
- UN1993 Waste Flammable Liquid N.O.S. (Ethyl Acetate) Class 3, PG II, FP 11.7 C
- UN1993 Waste Flammable Liquid N.O.S. (Ethyl Acetate, Toluene) Class 3, PG II, FP 22.7 C
- UN1993 Waste Flammable Liquid N.O.S. (Isopropanol) Class 3, PG II, FP 22.7 C
- UN1993 Waste Flammable Liquid N.O.S. (Isopropyl Ether) Class 3, PG II, FP 12 C
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- UN1993 Waste Flammable Liquid N.O.S. (Isopropyl Ether, Acetone) Class 3, PG II, FP 12 C
- UN1993 Waste Flammable Liquid N.O.S. (N-Methyl-2-Propolidone) Class 3, PG II, FP 22.7 C

These types of waste are flammable and have the potential to cause burns to employees in the event of an accidental release in which catches fire. A list of all the chemicals handled is maintained at the facility and a Safety Data/Technical Sheet for each can be supplied at your request.

We have also enclosed a copy of our Emergency Response Procedures. The plan is designed to minimize hazards to human health and the environment from fires, explosions or any unplanned

sudden or non-sudden release of hazardous waste to the air, soil or surface water. Please review and retain this plan in your files in the event of an emergency.

Thank you for your cooperation in this matter. Should you have any questions or desire to visit the facility, please contact me at (561) 882-2556.

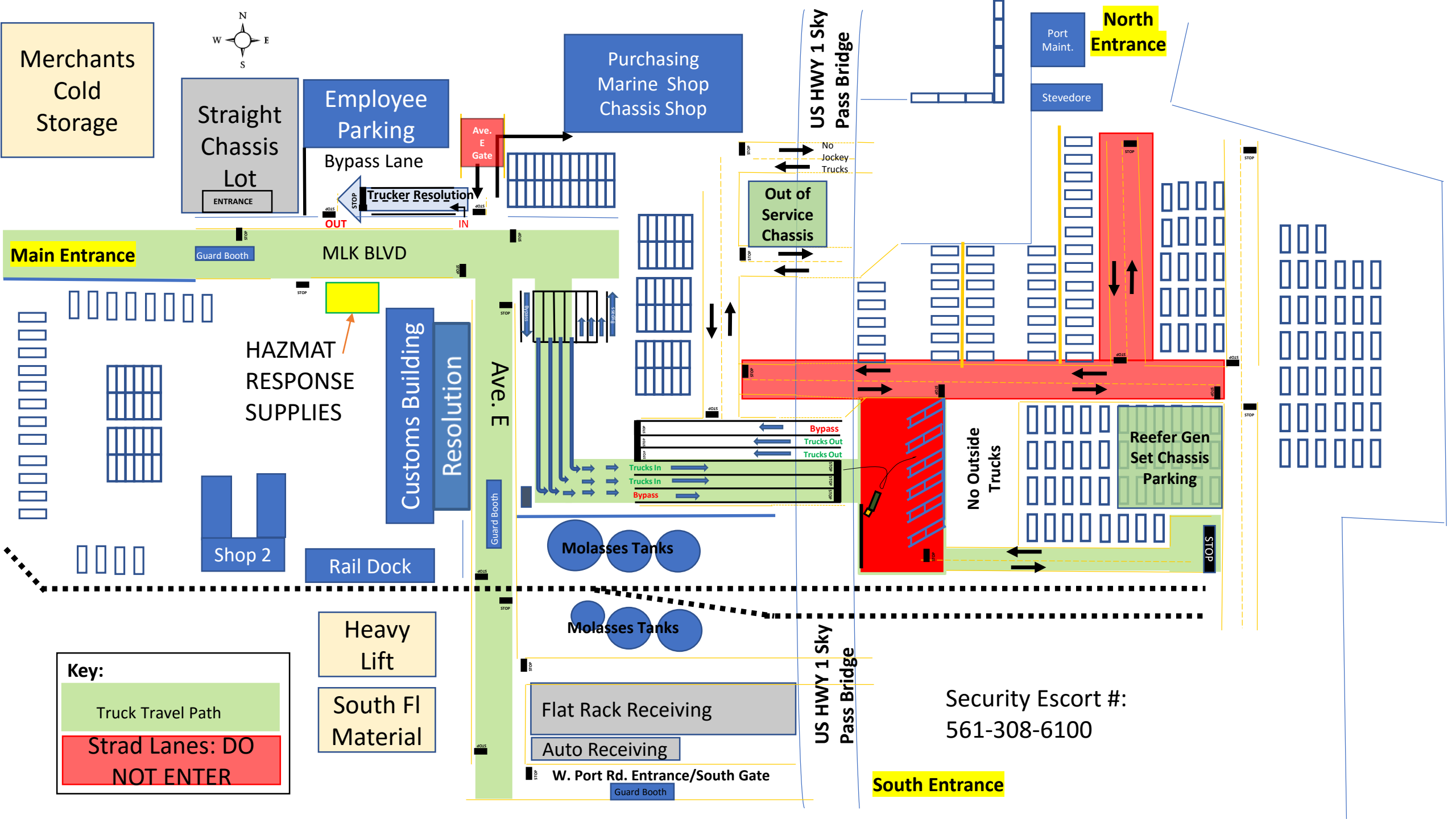
Sincerely,

Matthew S. King, CSP, SMS | Health, Safety & Environmental Manager | Tropical Shipping | Mailstop: MLK 01-12 | 501 Avenue P |
Riviera Beach, FL 33404 | Office: (561) 882-2556 | mking@tropical.com



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This information is intended to provide interpretative information in regard to the subject matter covered as a service to our clients and has been answered to the best of our ability based on the information provided to us. We do not guarantee the accuracy or completeness of any such interpretation or information, nor do we warrant that compliance with any advice we provide will guarantee compliance with any legal or regulatory requirements. Our statements or opinions do not convey legal interpretation and government authorities or legal counsel should be contacted for such a response.





A. Statement of Policy

It is a primary objective of Tropical Shipping to prevent hazardous material leaks and/or spills to avoid employee exposure to harmful concentrations of these substances and to prevent environmental damage to our equipment, property, and the environment. This will be accomplished through the utilization of acceptable practices for handling, storing, loading, unloading, and shipping of hazardous materials. When these practices fail, or other outside factors lead to a leak or spill of hazardous materials, qualified employee teams will be mobilized to control the initial incident and clean up spills within their capabilities. Outside emergency response contractors will be responsible for the cleaning up of spills and leaks outside the magnitude of our training and equipment.

B. Application of Policy

This policy applies to all Tropical Shipping employees in the United States, St. Thomas and St. Croix.

C. Objective

1. The company's objective is to provide safe, rapid response to emergencies involving leaks/spills of hazardous materials by creating and maintaining specialty, in-house teams trained to deal with hazardous materials emergencies.
2. The company's primary concern is the health and safety of our employees and others in our communities. Our secondary concern shall be to minimize the effect the leak or spill has on our surrounding environment.
3. After safety and environmental concerns are under control, protection and cleanup of company property shall be undertaken, and waste/cleanup materials shall be disposed of according to applicable regulations.

D. Definition

Leak/spill is defined as any unplanned or unapproved discharge of solid, liquid, or gas, that could adversely affect an employee's or the community's safety through contamination of air, water, soil, or through personal contact.

E. Emergency Response Team Organization & Training

1. Hazardous Materials Emergency Response Teams of trained employees will be formed in West Palm Beach, Miami, St. Thomas, and St. Croix.
2. The number of response teams at each location will vary based on workforce size.
West Palm Beach will maintain three teams, structured to represent common work areas as follows:
 - a) Cargo Handling (MLK Warehouse, Import, TL Rail)
 - b) Port Operations (Interchange, Stevedoring, Marine)
 - c) Support Operations (Chassis Maintenance, Container Repair, Automotive, Port Maintenance, Trucking, Security, Refrigeration, and Fleet Purchasing)

The Cargo Handling and Port Operations Teams will be the primary responders for cargo leak and spill incidents and will assist in other responses, as required.

The Support Operations Team will be the primary responder for equipment/vehicle/facility leak and spill incidents and will assist in other responses, as required.



Administration: Human Resources Policies

Emergency Response Procedures for Hazardous Materials

Miami, St. Thomas, and St. Croix will each have one team, comprised of employees from several work areas, to represent the work location.

3. All Emergency Response Team members who are selected to respond to releases or potential releases, for the purpose of stopping the release, or who will assume control of the incident scene beyond the first responder level, will initially receive a minimum of 32 hours of OSHA approved/certified training in leak and spill management. Annually, thereafter, members will receive a minimum of 8 hours refresher training.
4. Team members will meet annually to participate in continuing training.
5. All time spent by team members in training and spill response will be paid time.
6. All training will be coordinated by the Safety Department.
7. In the event of an incident, an incident commander will be established according to the order established in the section, On-Scene Incident Commander.
8. In addition to the Emergency Response Team, additional employees may be trained in basic spill management and the details of our First Responder procedures.

F. Emergency Response Team

1. The members of the Emergency Response Team are under the sole direction of the incident commander, in the event they are called upon to respond to an incident.
2. The members of the Emergency Response Team must be immediately released from their normal assigned duties to participate in an incident response.
3. All members of the Emergency Response Team established for an area will respond to incidents within their area when called upon to do so by the incident commander.
4. In the event an incident occurs in an area that is not a participant in the Emergency Response Team, the Incident Commander will select the team which is best trained to handle the particular type of incident involved.
5. Based on their knowledge of our response capabilities, and the extent of the liability associated with a particular incident, the incident commander has authority to appropriate additional company resources beyond the scope of the Emergency Response Team to bring an incident under control.
6. At no time shall employees put their own personal safety in jeopardy to protect physical property.
7. In the event outside support is needed in any Florida facility, **Cliff Berry Inc.** will be mobilized by calling the Emergency Response Hotline **1-800-899-7745**.

G. Emergency Response Team Responsibilities

1. First Responders

First responders are employees who are likely to witness or discover a release of hazardous materials and are trained to initiate the company's "Emergency Response Procedure for Hazardous Materials" as follows:

- a) Evacuate all persons from the spill and affected areas.
- b) Secure the spill in the affected area from accidental entry and disconnect any ignition sources.



Administration: Human Resources Policies

Emergency Response Procedures for Hazardous Materials

- c) Begin first aid treatment to exposed personnel, referring to labels and Safety Data Sheets for first aid procedures.
- d) Obtain the following information, if conditions permit:
 - 1) the trade name and chemical name of the substance and the identification number
 - 2) volume of spill (i.e. gallon, 5 gallons, drum, tank, etc.)
 - 3) hazards of substance (i.e. flammable, corrosive, toxic or reactive with water)
 - 4) other chemicals in the spill and affected areas
 - 5) whether the spill or leak is near a well, ditch, canal, or storm sewer
 - 6) determine the nature and extent of injuries, fire and damages
- e) Immediately report the leak/spill to their supervisor and/or the Safety Department so that a decision regarding what additional emergency action must be taken can be made. It is the responsibility of the department supervisor of the area in which the spill actually occurred to notify the Safety Department. An immediate report of a leak/spill is essential so response team efforts can be organized.
- f) Not allow anyone to re-enter evacuated areas until they are declared safe, and necessary equipment is restored to full working order.
- g) Refer all questions from news reporters to the office of the Director of Government and Public Affairs in Riviera Beach.
- h) Document all leaks/spills, using a Safety Incident Report form. It is important that this form be filled out completely so that the proper information can be passed on to regulatory agencies and disposal companies.

2. Hazardous Material Technician

Hazardous Material Technicians are Emergency Response Team members who assume a more aggressive role, and who will respond to releases for the purpose of containing, stopping the release, and performing site cleanup. Team members will be trained and required to:

- a) Interpret basic hazardous product information in order to make a risk assessment.
- b) Select and use appropriate protective equipment available for the type of incident.
- c) Use field survey instruments to identify the hazardous materials and/or perform risk assessment.
- d) Perform advanced control and containment operations with the resources and equipment available.
- e) Function in an assigned role in the Incident Command System.
- f) Be knowledgeable of the Local Emergency Planning Committee (LEPC) and local response procedures.
- g) Implement decontamination procedures.
- h) Develop a site safety and control plan.
- i) Refer all questions from news reporters to the office of the Director of Government and Public Affairs in Riviera Beach.

3. On-Scene Incident Commander

- a) The senior emergency response employee responding to an incident will become the individual in charge of a site-specific Incident Command System (ICS). All emergency responders and their communications shall be coordinated and controlled through the incident commander, assisted by the senior management representative present.
- b) The senior emergency response employee will be the most senior employee trained in emergency response procedures and who has working knowledge of the operations at the site. As more experienced and/or senior emergency responders arrive (Health, Safety and Environmental Manager, Safety Engineer, Coast Guard, Fire Department, outside HazMat contractor) the position will be passed up the line of authority.
- c) Tropical hierarchy of Incident Commanders is as follows:
 - 1) Safety Engineer
 - 2) Emergency Responders (Hazardous Materials Technicians)
 - 3) Directors
 - 4) Managers/Supervisors
- d) Tropical will relinquish the control of the Incident Command to outside agencies as required under the state and/or federal regulations (i.e., Fire Department, Coast Guard, HazMat contractor), and/or as dictated by the severity of the incident.
- e) Employees at this level will be trained and required to:
 - 1) Implement the company's Emergency Response Procedures for Hazardous Materials.
 - 2) Implement the company's incident command system.
 - 3) Understand the hazards and risks associated with employees working in chemical protective clothing.
 - 4) Identify, to the extent possible, all hazardous substances present, and address as required with a site analysis, maximum exposure limits, and determine the appropriate control and containment procedures to be utilized.
 - 5) Assure that the personal protection used is appropriate for the hazards to be encountered.
 - 6) Determine when a decreased level of protective clothing and/or respiratory protection will not result in hazardous exposures to employees.
 - 7) Limit the number of emergency response personnel at the emergency site (areas of potential or actual exposure to hazards) to those who are actively performing emergency operations.
 - 8) Secure additional company manpower or resources outside the emergency response team in order to mitigate or control the incident to alleviate or reduce the company liability/risk.
 - 9) Terminate emergency response activities if determined that further response may subject the team to Immediately Dangerous to Life and Health (IDLH) conditions.
 - 10) Implement appropriate decontamination procedures at the completion of the emergency operations.
 - 11) Coordinate and assure the disposal of all remaining hazardous materials/cleanup materials are completed according to applicable state and federal regulations.

- 12) Refer all questions from news reporters to the office of the Director of Government and Public Affairs in Riviera Beach.
- 13) Document all leak/spill, using a Safety Incident Report form. It is important that this form be filled out completely so that the proper information can be passed on to regulatory agencies and disposal companies.

H. Medical Care

For injuries requiring medical treatment beyond first aid, employees should refer to the Emergency Calling Procedures for their location. The following treatment facilities will be utilized for non-life-threatening or after-hours injuries:

West Palm Beach Area

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West Palm Beach, FL 33407
561-881-0066

St. Mary's Medical Center

901 45th St.
West Palm Beach, FL 33407

Miami Area

Concentra Urgent Care

7800 NW 25th St., Ste 4
Doral, FL 33122
305-593-2174

Kendal Regional Medical Center

11750 SW 40th St.
Miami, FL 33175
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I. Reporting

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Matthew King

From: Matthew King
Sent: Tuesday, March 3, 2020 3:47 PM
To: 'gregory.cotes@tenanthealth.com'
Subject: Notification of Hazardous Waste Shipments
Attachments: PPB Tropical Map.pdf; Emergency Response Procedures for Hazardous Materials.pdf

Greg,

I'm Matt King, Tropical Shipping's Health, Safety and Environmental Manager and in accordance with the federal and state hazardous waste regulations, Tropical Shipping is required to notify you of our facility's hazardous waste activities. Tropical Shipping is required to give local police, fire departments, hospitals, and state or local emergency response teams a layout of the facility, so they may become familiar with entrances to roads inside the facility, and possible evacuation routes. A copy of the facility layout is enclosed for your review and should be kept on file at your organization.

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Thank you for your cooperation in this matter. Should you have any questions or desire to visit the facility, please contact me at (561) 882-2556.

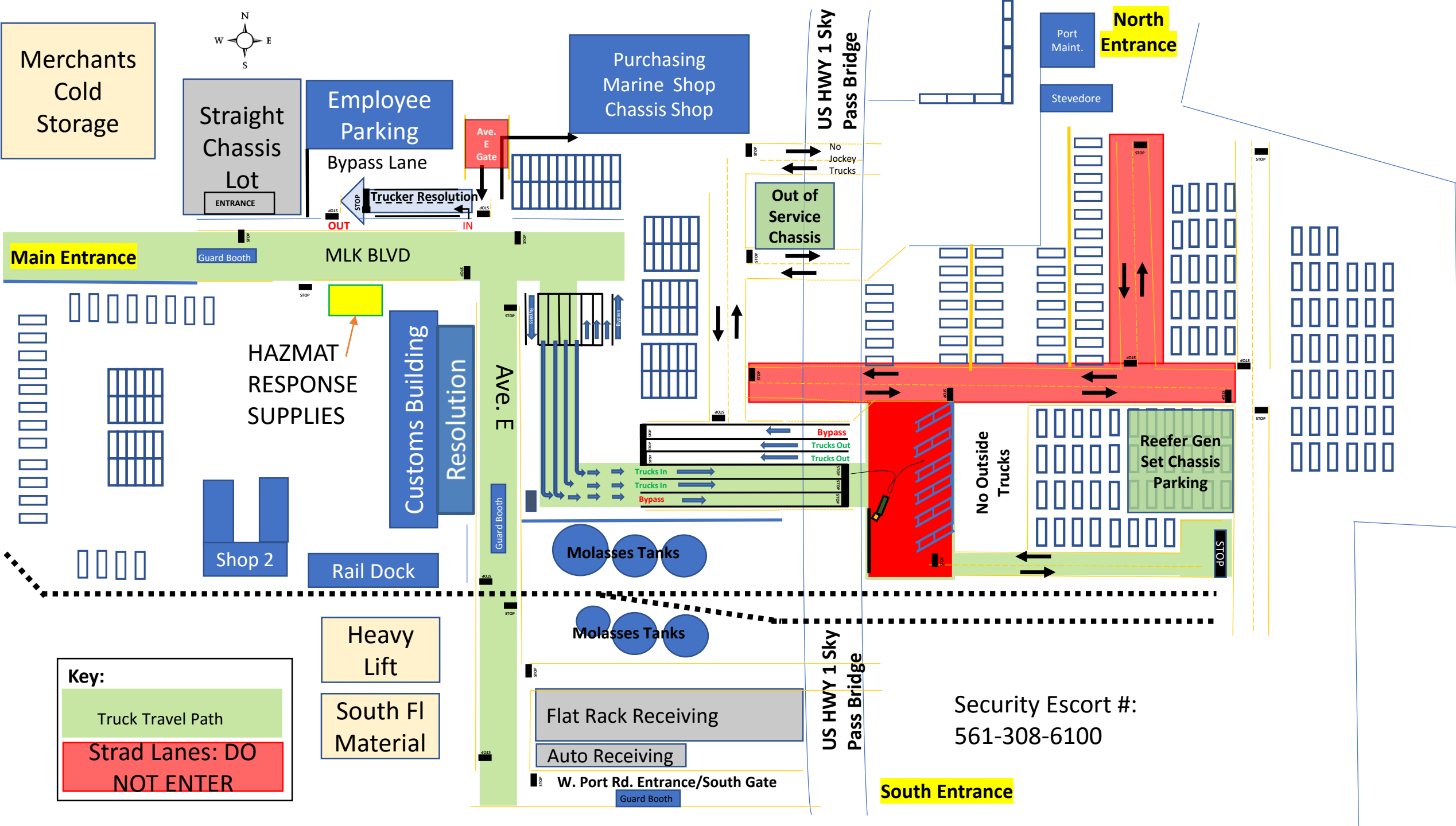
Sincerely,

Matthew S. King, CSP, SMS | Health, Safety & Environmental Manager | Tropical Shipping | Mailstop: MLK 01-12 | 501 Avenue P |
Riviera Beach, FL 33404 | Office: (561) 882-2556 | mking@tropical.com



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all copies of this message.





A. Statement of Policy

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3. After safety and environmental concerns are under control, protection and cleanup of company property shall be undertaken, and waste/cleanup materials shall be disposed of according to applicable regulations.

D. Definition

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Administration: Human Resources Policies

Emergency Response Procedures for Hazardous Materials

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5. Based on their knowledge of our response capabilities, and the extent of the liability associated with a particular incident, the incident commander has authority to appropriate additional company resources beyond the scope of the Emergency Response Team to bring an incident under control.
6. At no time shall employees put their own personal safety in jeopardy to protect physical property.
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G. Emergency Response Team Responsibilities

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First responders are employees who are likely to witness or discover a release of hazardous materials and are trained to initiate the company's "Emergency Response Procedure for Hazardous Materials" as follows:

- a) Evacuate all persons from the spill and affected areas.
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Administration: Human Resources Policies

Emergency Response Procedures for Hazardous Materials

- c) Begin first aid treatment to exposed personnel, referring to labels and Safety Data Sheets for first aid procedures.
- d) Obtain the following information, if conditions permit:
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 - 6) determine the nature and extent of injuries, fire and damages
- e) Immediately report the leak/spill to their supervisor and/or the Safety Department so that a decision regarding what additional emergency action must be taken can be made. It is the responsibility of the department supervisor of the area in which the spill actually occurred to notify the Safety Department. An immediate report of a leak/spill is essential so response team efforts can be organized.
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Matthew King

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Attachments: PPB Tropical Map.pdf; Emergency Response Procedures for Hazardous Materials.pdf

Daniel,

In accordance with the federal and state hazardous waste regulations, Tropical Shipping is required to notify you of our facility's hazardous waste activities. Tropical Shipping is required to give local police, fire departments, hospitals, and state or local emergency response teams a layout of the facility, so they may become familiar with entrances to roads inside the facility, and possible evacuation routes. A copy of the facility layout is enclosed for your review and should be kept on file at your organization.

Tropical Shipping is also required to familiarize local hospitals with the properties of hazardous waste handled at the facility and the types of injuries or illnesses that could result from fires, explosions, or releases at the facility. Tropical Shipping deals with the following hazardous wastes:

- UN 1993 Waste Flammable Liquid N.O.S. (Isopropanol, Dimethylformamide) Class 3, PG II, FP 22.7 C
- UN1993 Waste Flammable Liquid N.O.S. (Isopropyl Ether, Acetone) Class 3, PG II, FP 12 C
- UN1993 Waste Flammable Liquid N.O.S. (Ethyl Acetate) Class 3, PG II, FP 11.7 C
- UN1993 Waste Flammable Liquid N.O.S. (Ethyl Acetate, Toluene) Class 3, PG II, FP 22.7 C
- UN1993 Waste Flammable Liquid N.O.S. (Isopropanol) Class 3, PG II, FP 22.7 C
- UN1993 Waste Flammable Liquid N.O.S. (Isopropyl Ether) Class 3, PG II, FP 12 C
- UN1993 Waste Flammable Liquid N.O.S. (Isopropyl Ether, Isopropyl Alcohol) Class 3, PG II, FP 12 C
- UN1993 Waste Flammable Liquid N.O.S. (Isopropyl Ether, Acetone) Class 3, PG II, FP 12 C
- UN1993 Waste Flammable Liquid N.O.S. (N-Methyl-2-Propolidone) Class 3, PG II, FP 22.7 C

These types of waste are flammable and have the potential to cause burns to employees in the event of an accidental release in which catches fire. A list of all the chemicals handled is maintained at the facility and a Safety Data/Technical Sheet for each can be supplied at your request.

We have also enclosed a copy of our Emergency Response Procedures. The plan is designed to minimize hazards to human health and the environment from fires, explosions or any unplanned sudden or non-sudden release of hazardous waste to the air, soil or surface water. Please review and retain this plan in your files in the event of an emergency.

Thank you for your cooperation in this matter. Should you have any questions or desire to visit the facility, please contact me at (561) 882-2556.

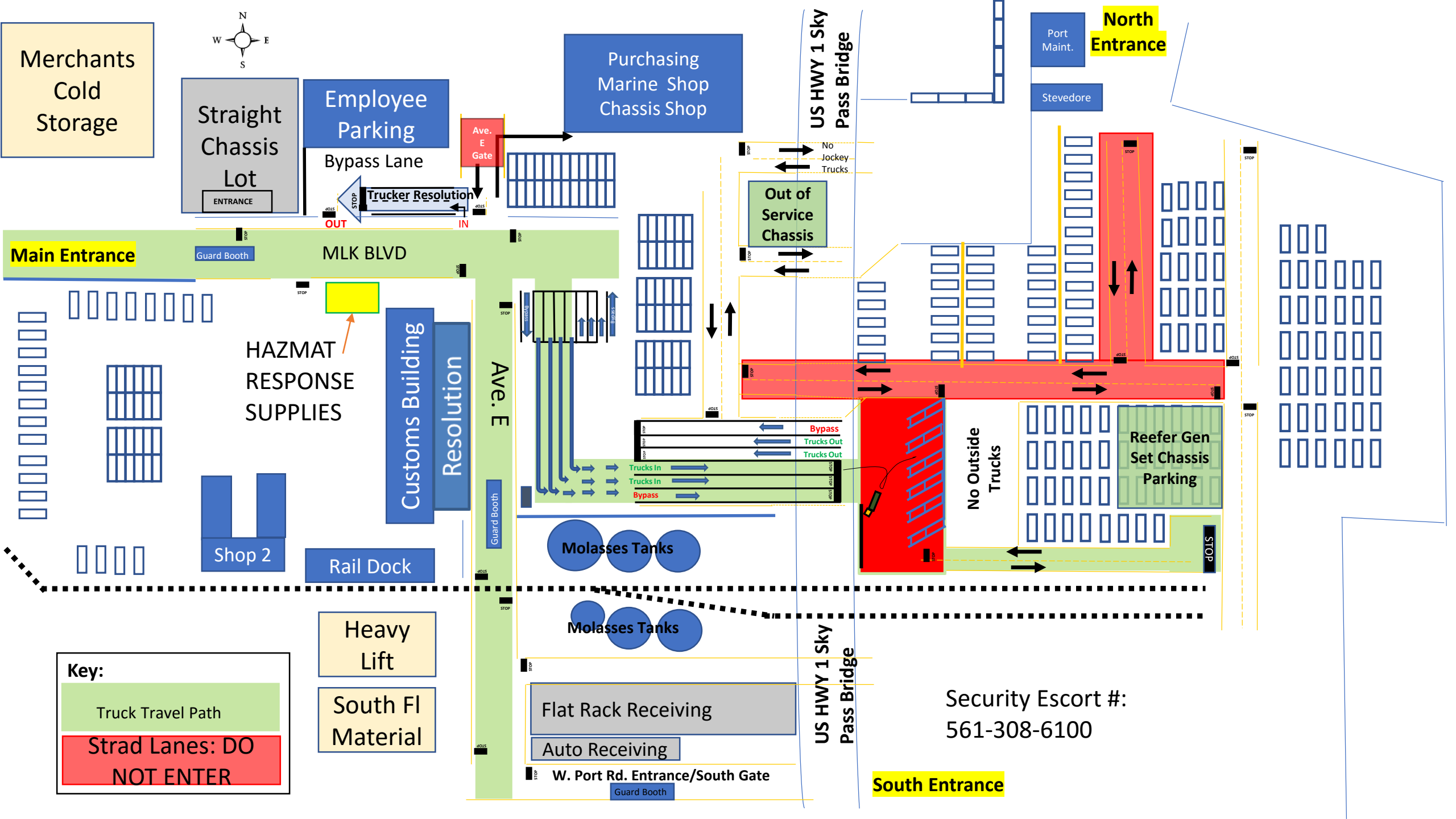
Sincerely,

Matthew S. King, CSP, SMS | Health, Safety & Environmental Manager | Tropical Shipping | Mailstop: MLK 01-12 | 501 Avenue P |
Riviera Beach, FL 33404 | Office: (561) 882-2556 | mking@tropical.com



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This information is intended to provide interpretative information in regard to the subject matter covered as a service to our clients and has been answered to the best of our ability based on the information provided to us. We do not guarantee the accuracy or completeness of any such interpretation or information, nor do we warrant that compliance with any advice we provide will guarantee compliance with any legal or regulatory requirements. Our statements or opinions do not convey legal interpretation and government authorities or legal counsel should be contacted for such a response.





A. Statement of Policy

It is a primary objective of Tropical Shipping to prevent hazardous material leaks and/or spills to avoid employee exposure to harmful concentrations of these substances and to prevent environmental damage to our equipment, property, and the environment. This will be accomplished through the utilization of acceptable practices for handling, storing, loading, unloading, and shipping of hazardous materials. When these practices fail, or other outside factors lead to a leak or spill of hazardous materials, qualified employee teams will be mobilized to control the initial incident and clean up spills within their capabilities. Outside emergency response contractors will be responsible for the cleaning up of spills and leaks outside the magnitude of our training and equipment.

B. Application of Policy

This policy applies to all Tropical Shipping employees in the United States, St. Thomas and St. Croix.

C. Objective

1. The company's objective is to provide safe, rapid response to emergencies involving leaks/spills of hazardous materials by creating and maintaining specialty, in-house teams trained to deal with hazardous materials emergencies.
2. The company's primary concern is the health and safety of our employees and others in our communities. Our secondary concern shall be to minimize the effect the leak or spill has on our surrounding environment.
3. After safety and environmental concerns are under control, protection and cleanup of company property shall be undertaken, and waste/cleanup materials shall be disposed of according to applicable regulations.

D. Definition

Leak/spill is defined as any unplanned or unapproved discharge of solid, liquid, or gas, that could adversely affect an employee's or the community's safety through contamination of air, water, soil, or through personal contact.

E. Emergency Response Team Organization & Training

1. Hazardous Materials Emergency Response Teams of trained employees will be formed in West Palm Beach, Miami, St. Thomas, and St. Croix.
2. The number of response teams at each location will vary based on workforce size.
West Palm Beach will maintain three teams, structured to represent common work areas as follows:
 - a) Cargo Handling (MLK Warehouse, Import, TL Rail)
 - b) Port Operations (Interchange, Stevedoring, Marine)
 - c) Support Operations (Chassis Maintenance, Container Repair, Automotive, Port Maintenance, Trucking, Security, Refrigeration, and Fleet Purchasing)

The Cargo Handling and Port Operations Teams will be the primary responders for cargo leak and spill incidents and will assist in other responses, as required.

The Support Operations Team will be the primary responder for equipment/vehicle/facility leak and spill incidents and will assist in other responses, as required.



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Emergency Response Procedures for Hazardous Materials

Miami, St. Thomas, and St. Croix will each have one team, comprised of employees from several work areas, to represent the work location.

3. All Emergency Response Team members who are selected to respond to releases or potential releases, for the purpose of stopping the release, or who will assume control of the incident scene beyond the first responder level, will initially receive a minimum of 32 hours of OSHA approved/certified training in leak and spill management. Annually, thereafter, members will receive a minimum of 8 hours refresher training.
4. Team members will meet annually to participate in continuing training.
5. All time spent by team members in training and spill response will be paid time.
6. All training will be coordinated by the Safety Department.
7. In the event of an incident, an incident commander will be established according to the order established in the section, On-Scene Incident Commander.
8. In addition to the Emergency Response Team, additional employees may be trained in basic spill management and the details of our First Responder procedures.

F. Emergency Response Team

1. The members of the Emergency Response Team are under the sole direction of the incident commander, in the event they are called upon to respond to an incident.
2. The members of the Emergency Response Team must be immediately released from their normal assigned duties to participate in an incident response.
3. All members of the Emergency Response Team established for an area will respond to incidents within their area when called upon to do so by the incident commander.
4. In the event an incident occurs in an area that is not a participant in the Emergency Response Team, the Incident Commander will select the team which is best trained to handle the particular type of incident involved.
5. Based on their knowledge of our response capabilities, and the extent of the liability associated with a particular incident, the incident commander has authority to appropriate additional company resources beyond the scope of the Emergency Response Team to bring an incident under control.
6. At no time shall employees put their own personal safety in jeopardy to protect physical property.
7. In the event outside support is needed in any Florida facility, **Cliff Berry Inc.** will be mobilized by calling the Emergency Response Hotline **1-800-899-7745**.

G. Emergency Response Team Responsibilities

1. First Responders

First responders are employees who are likely to witness or discover a release of hazardous materials and are trained to initiate the company's "Emergency Response Procedure for Hazardous Materials" as follows:

- a) Evacuate all persons from the spill and affected areas.
- b) Secure the spill in the affected area from accidental entry and disconnect any ignition sources.



Administration: Human Resources Policies

Emergency Response Procedures for Hazardous Materials

- c) Begin first aid treatment to exposed personnel, referring to labels and Safety Data Sheets for first aid procedures.
- d) Obtain the following information, if conditions permit:
 - 1) the trade name and chemical name of the substance and the identification number
 - 2) volume of spill (i.e. gallon, 5 gallons, drum, tank, etc.)
 - 3) hazards of substance (i.e. flammable, corrosive, toxic or reactive with water)
 - 4) other chemicals in the spill and affected areas
 - 5) whether the spill or leak is near a well, ditch, canal, or storm sewer
 - 6) determine the nature and extent of injuries, fire and damages
- e) Immediately report the leak/spill to their supervisor and/or the Safety Department so that a decision regarding what additional emergency action must be taken can be made. It is the responsibility of the department supervisor of the area in which the spill actually occurred to notify the Safety Department. An immediate report of a leak/spill is essential so response team efforts can be organized.
- f) Not allow anyone to re-enter evacuated areas until they are declared safe, and necessary equipment is restored to full working order.
- g) Refer all questions from news reporters to the office of the Director of Government and Public Affairs in Riviera Beach.
- h) Document all leaks/spills, using a Safety Incident Report form. It is important that this form be filled out completely so that the proper information can be passed on to regulatory agencies and disposal companies.

2. Hazardous Material Technician

Hazardous Material Technicians are Emergency Response Team members who assume a more aggressive role, and who will respond to releases for the purpose of containing, stopping the release, and performing site cleanup. Team members will be trained and required to:

- a) Interpret basic hazardous product information in order to make a risk assessment.
- b) Select and use appropriate protective equipment available for the type of incident.
- c) Use field survey instruments to identify the hazardous materials and/or perform risk assessment.
- d) Perform advanced control and containment operations with the resources and equipment available.
- e) Function in an assigned role in the Incident Command System.
- f) Be knowledgeable of the Local Emergency Planning Committee (LEPC) and local response procedures.
- g) Implement decontamination procedures.
- h) Develop a site safety and control plan.
- i) Refer all questions from news reporters to the office of the Director of Government and Public Affairs in Riviera Beach.

3. On-Scene Incident Commander

- a) The senior emergency response employee responding to an incident will become the individual in charge of a site-specific Incident Command System (ICS). All emergency responders and their communications shall be coordinated and controlled through the incident commander, assisted by the senior management representative present.
- b) The senior emergency response employee will be the most senior employee trained in emergency response procedures and who has working knowledge of the operations at the site. As more experienced and/or senior emergency responders arrive (Health, Safety and Environmental Manager, Safety Engineer, Coast Guard, Fire Department, outside HazMat contractor) the position will be passed up the line of authority.
- c) Tropical hierarchy of Incident Commanders is as follows:
 - 1) Safety Engineer
 - 2) Emergency Responders (Hazardous Materials Technicians)
 - 3) Directors
 - 4) Managers/Supervisors
- d) Tropical will relinquish the control of the Incident Command to outside agencies as required under the state and/or federal regulations (i.e., Fire Department, Coast Guard, HazMat contractor), and/or as dictated by the severity of the incident.
- e) Employees at this level will be trained and required to:
 - 1) Implement the company's Emergency Response Procedures for Hazardous Materials.
 - 2) Implement the company's incident command system.
 - 3) Understand the hazards and risks associated with employees working in chemical protective clothing.
 - 4) Identify, to the extent possible, all hazardous substances present, and address as required with a site analysis, maximum exposure limits, and determine the appropriate control and containment procedures to be utilized.
 - 5) Assure that the personal protection used is appropriate for the hazards to be encountered.
 - 6) Determine when a decreased level of protective clothing and/or respiratory protection will not result in hazardous exposures to employees.
 - 7) Limit the number of emergency response personnel at the emergency site (areas of potential or actual exposure to hazards) to those who are actively performing emergency operations.
 - 8) Secure additional company manpower or resources outside the emergency response team in order to mitigate or control the incident to alleviate or reduce the company liability/risk.
 - 9) Terminate emergency response activities if determined that further response may subject the team to Immediately Dangerous to Life and Health (IDLH) conditions.
 - 10) Implement appropriate decontamination procedures at the completion of the emergency operations.
 - 11) Coordinate and assure the disposal of all remaining hazardous materials/cleanup materials are completed according to applicable state and federal regulations.

- 12) Refer all questions from news reporters to the office of the Director of Government and Public Affairs in Riviera Beach.
- 13) Document all leak/spill, using a Safety Incident Report form. It is important that this form be filled out completely so that the proper information can be passed on to regulatory agencies and disposal companies.

H. Medical Care

For injuries requiring medical treatment beyond first aid, employees should refer to the Emergency Calling Procedures for their location. The following treatment facilities will be utilized for non-life-threatening or after-hours injuries:

West Palm Beach Area

Concentra Urgent Care

4455 Medical Center Way
West Palm Beach, FL 33407
561-881-0066

St. Mary's Medical Center

901 45th St.
West Palm Beach, FL 33407

Miami Area

Concentra Urgent Care

7800 NW 25th St., Ste 4
Doral, FL 33122
305-593-2174

Kendal Regional Medical Center

11750 SW 40th St.
Miami, FL 33175
305-223-3000

I. Reporting

The Safety Department must be contacted for any chemical spills, including hazardous waste, that enter a storm drain, contact soil, or potentially leave the site. The Safety Department will immediately notify the following agencies:

National Response Commission

1-800-424-8802

Florida Department of Environmental Protection

DEP State Watch Office
1-800-320-0519

Department of Transportation

Form F 5800.1
(Unless exempted per 49 CFR 171.16(d))



J. Disposal

All hazardous/non-hazardous waste must be properly disposed of in accordance with state and federal regulations. Waste generated from any chemical spill must be properly cleaned-up, neutralized, containerized in DOT-approved drums, and properly labeled. The hazardous/non-hazardous waste labels are located in the Central Accumulation Area near Shop 2 in the Port of Palm Beach.

K. Relationship to Other Policies

1. For details on Safety and Environmental Responsibility, see the Safety & Environmental Responsibility.
2. For details on our environmental program, see the Environmental Policy.
3. For details on our Emergency Calling Procedures, see the Emergency Calling Procedures for West Palm Beach and Miami.