

From: Bill Parkes [BParkes@cliffberryinc.com]
Sent: Monday, June 22, 2009 12:31 PM
To: Winston, Kathy
Cc: Dupuy, Didier
Subject: CBI RESPONSE TO THE FDEP USED OIL / HAZ
WASTE INSPECTION OF THE CBI - PORT EVERGLADES FACILITY ON MAY
19, 2009

Kathy -

Please see below - Item No. 4 from your inspection document has been completed.

We have reviewed our internal manifesting procedures and have provided CBI personnel with revised training. We have also added additional QA/QC supervision to manifest documentation recording as follows:

All manifests will be reviewed by department supervisor to ensure accuracy of all items, and specifically:

1. Generator EPA ID number. If the facility does not have a registered EPA ID number in accordance with all governmental regulations, then the generator will be considered a Conditionally Exempt Small Quantity Generator and in lieu of said number, the acronym: "CESGQ" will be placed in block 1 of all said Manifests/Bills of Lading.
2. Designated facility will be reviewed for accuracy. Should an error be found, the incorrect facility will be lined out of blocks 9 and 10 respectfully, initialed and the correct facility information, including the facility's EPA ID number, will be annotated in block 19, designated for discrepancy indication.
3. All manifests/bills of lading will be reviewed for all necessary signatures, including generator, transporter and receiving facility.
4. Repeat offenders caught during the review process will be counseled and recommended for retraining of course HM181.

Thanks,

Bill

From: Bill Parkes [BParkes@cliffberryinc.com]
Sent: Monday, June 22, 2009 3:16 PM
To: Winston, Kathy
Cc: Dupuy, Didier
Subject: ITEM #3
Attachments: scan20090622144215.pdf

Kathy -

Please find attached a copy of a General Facility Inspection Log that CBI created based on 40 CFR 279.52 (2) thru (5).

Remember in our tank farm logbook we will still continue to verify and sign off on a weekly basis: Tank Integrity, Tank Supports & Foundations, Liquid Sensing Devices, Above Ground Valves, Pipe and Fittings as we have done since the beginning.

If the General Facility Inspection Log attached meets with your approval, we will implement immediately and forward filled out copies to you as requested in your inspection document.

I look forward to hearing from you.

Thanks,

Bill

From: Bill Parkes [BParkes@cliffberryinc.com]
Sent: Monday, June 22, 2009 4:57 PM
To: Winston, Kathy
Cc: Dupuy, Didier
Subject: ITEM #3
Attachments: scan20090622165417.pdf

Kathy -

Please find attached our Revised General Facility Inspection Log which is appropriate for our facility.

Please let me know if ok.

Thanks,

Bill

General Facility Inspection Log

Name

Date

Done?	Item	Date	Notes
	Fire extinguisher (10 lb min)		Exp Date:
	Cell phone/communications		
	Spill controll Equipment		
	Fire hydrant access and pressure		
	Decontamination supplies		
	Second tech for all transfers		
	Tank farm locked and secured		
	Tank farm lighting functioning		
	Tank farm fencing in tact		

Done?	Item	Date	Notes
	Fire extinguisher (10 lb min)		Exp Date:
	Cell phone/communications		
	Spill controll Equipment		
	Fire hydrant access and pressure		
	Decontamination supplies		
	Second tech for all transfers		
	Tank farm locked and secured		
	Tank farm lighting functioning		
	Tank farm fencing in tact		

Done?	Item	Date	Notes
	Fire extinguisher (10 lb min)		Exp Date:
	Cell phone/communications		
	Spill controll Equipment		
	Fire hydrant access and pressure		
	Decontamination supplies		
	Second tech for all transfers		
	Tank farm locked and secured		
	Tank farm lighting functioning		
	Tank farm fencing in tact		

Done?	Item	Date	Notes
	Fire extinguisher (10 lb min)		Exp Date:
	Cell phone/communications		
	Spill controll Equipment		
	Fire hydrant access and pressure		
	Decontamination supplies		
	Second tech for all transfers		
	Tank farm locked and secured		
	Tank farm lighting functioning		
	Tank farm fencing in tact		

Done?	Item	Date	Notes
	Fire extinguisher (10 lb min)		Exp Date:
	Cell phone/communications		
	Spill controll Equipment		
	Fire hydrant access and pressure		
	Decontamination supplies		
	Second tech for all transfers		
	Tank farm locked and secured		
	Tank farm lighting functioning		
	Tank farm fencing in tact		

Emergency Response Plan:

This Emergency Response Plan is not all inclusive, but designed to provide a guide for appropriate actions in the event of a spill. The most important thing to remember is to remain calm and try to get the situation under control as soon as possible.

A. DO NOT PANIC, REMAIN CALM. Examine your own condition first. If you or anyone with you is injured, call for medical assistance.

B. Assess the extent of rupture or damage to the tank or hoses. CLOSE OFF any valves, hatches or hose connections; secure out flow.

C. Evaluate the degree of contamination to the environment and estimate the number of gallons spilled.

D. If possible, pump liquid back into the tank, even if the is ruptured. This will recycle the spilled oil to the truck's tank rather tan spreading it onto the ground.

E. Do your best to dike ahead of the spill to prevent oil from entering storm sewers and/or waterways.

Emergency Contact Numbers:

- Fire/injury/police: 911
- Oil spill response: (800)899-7745
- Cliff Berry, II (QI):(954)325-7392
- Larry Doyle (AQI):(954)444-5816

Oil Spill Reporting Requirements:

1. Name, address and phone of person reporting the incident
2. Exact location of the spill
3. Date & time the spill occurred
4. Name of material spilled (if other than oil)
5. Estimated quantity spilled
6. Source of spilled material
7. Cause of spill (if known)
8. Containment & clean-up actions taken

General Facility Inspection Log

Facility:

Month:

Initials	Item	Date	Notes
	Fire extinguisher(10 lb min)/hydrant		Exp Date:
	Cell phone/communications		
	Spill controll Equipment		
	Decontamination supplies		
	DangerUnauthorized Personnel Keep Out		
	Facility surveillence by security patrol		
	Facility access locked and secured		
	Facility lighting functioning		
	Facility 6' perimeter fencing secure		

Initials	Item	Date	Notes
	Fire extinguisher(10 lb min)/hydrant		Exp Date:
	Cell phone/communications		
	Spill controll Equipment		
	Decontamination supplies		
	DangerUnauthorized Personnel Keep Out		
	Facility surveillence by security patrol		
	Facility access locked and secured		
	Facility lighting functioning		
	Facility 6' perimeter fencing secure		

Initials	Item	Date	Notes
	Fire extinguisher(10 lb min)/hydrant		Exp Date:
	Cell phone/communications		
	Spill controll Equipment		
	Decontamination supplies		
	DangerUnauthorized Personnel Keep Out		
	Facility surveillence by security patrol		
	Facility access locked and secured		
	Facility lighting functioning		
	Facility 6' perimeter fencing secure		

Initials	Item	Date	Notes
	Fire extinguisher(10 lb min)/hydrant		Exp Date:
	Cell phone/communications		
	Spill controll Equipment		
	Decontamination supplies		
	DangerUnauthorized Personnel Keep Out		
	Facility surveillence by security patrol		
	Facility access locked and secured		
	Facility lighting functioning		
	Facility 6' perimeter fencing secure		

Emergency Response Plan:

This Emergency Response Plan is not all inclusive, but designed to provide a guide for appropriate actions in the event of a spill. The most important thing to remember is to remain calm and try to get the situation under control as soon as possible.

A. DO NOT PANIC, REMAIN CALM. Examine your own condition first. If you or anyone with you is injured, call for medical assistance.

B. Assess the extent of rupture or damage to the tank or hoses. CLOSE OFF any valves, hatches or hose connections; secure out flow.

C. Evaluate the degree of contamination to the environment and estimate the number of gallons spilled.

D. If possible, pump liquid back into the tank, even if the is ruptured. This will recycle the spilled oil to the truck's tank rather than spreading it onto the ground.

E. Do your best to dike ahead of the spill to prevent oil from entering storm sewers and/or waterways.

Emergency Contact Numbers:

- Fire/injury/police: 911
- Oil spill response: (800)899-7745
- Cliff Berry, II (QI):(954)325-7392
- Larry Doyle (AQI):(954)444-5816

Oil Spill Reporting Requirements:

1. Name, address and phone of person reporting the incident
2. Exact location of the spill
3. Date & time the spill occurred
4. Name of material spilled (if other than oil)
5. Estimated quantity spilled
6. Source of spilled material
7. Cause of spill (if known)
8. Containment & clean-up actions taken