



625 HIGHWAY 33 EAST • P.O. BOX 5010 • FREEHOLD, NJ 07728-5010 • 732-462-1001 • FAX 732-409-7243

HAZARDOUS MATERIALS/HAZARDOUS WASTE TRAINING POLICY

BARTOW, FLORIDA TERMINAL

It is the policy of Freehold Cartage, Inc. to ensure all personnel assigned to the Bartow, Florida terminal receive the following training:

Upon hire, (within the first 90 days of employment) and annually thereafter, all personnel, to include managers, supervisors, dispatchers, drivers and mechanics, are provided with 24 hours of initial training in compliance with OSHA requirements for First Responder, US DOT requirements for Hazmat Employees and FL DEP requirements for Used Oil and Universal Wastes.

Refresher training (8 hours) is also provided annually to each of these employees.

A copy of the training outline is available upon request.

FREEHOLD CARTAGE INC.

DRIVER TRAINING CLASS, BARTOW, FLORIDA – 02/27/10
Barry Olsen, Michael Hirst

Barry Olsen

- 8:00 AM** CSA 2010 discussion, Vigillo score card demonstration
- 9:30 AM** DOT Hours of Service update discussion, GPS audits, electronic logs
- 10:30 AM** Defensive driving/road rage, accident procedures
- 11:30 PM** Recent accidents/incidents, ATA DVD
- 1:00 PM** Hazmat transportation security, FCI security plan
- 1:30 PM** Manifests, US & Canadian

Mike Hirst

- 2:00 PM** Used Oil testing, record keeping
- 2:30 PM** Universal waste, mercury spills

Barry Olsen

- 3:00 PM** HM 126f, hazwoper, OSHA, written test
- 5:00 PM** Review



INITIAL DRIVER TRAINING PROGRAM - 24 HOURS

I. Introduction

A. Background Information and Reasons Leading To Government Regulation of Hazardous Waste.

Company Developed Slide Presentation - 30 minutes.

B. Hazardous Materials Regulations Overview.

1. U. S. Department of Transportation
2. Federal Motor Carrier Safety Regulations
3. Canadian Transport of Dangerous Goods
4. U. S. Environmental Protection Agency
5. Environment Canada
6. U. S. Occupational Safety & Health Administration

C. Hazardous Waste Regulations Overview

1. R.C.R.A.
2. E.P.A.
3. Environmental Concerns
4. N.J.D.E.P. and Foreign States
5. Manifests and L.D.R.'s
6. State/Provincial Permitting

D. Used Oil Transportation Regulations Overview

1. Federal and State Regulations
2. Delivery Sites
3. Halogen Testing
4. Contingency Plans/Spill Response

II. Hazardous Materials Training (HM 126f, HM 181, HM 232)

- A. Training Film - American Trucking Association, Washington, D.C. - "Hazardous Materials"
- B. Training Film - J.J. Keller, Neenah, WI - "HM-126F"
- C. Hazardous Materials Security Awareness
- D. FCI Security Plan In-Depth Training
- E. Recap Hazardous Materials and Waste Regulations

III. "Hands On" Equipment Training

- A. Vacuum Operations (Vacuum and Pressure)
- B. Hoses, Fittings, Screens, Drum Wands
- C. Drum Operations
- D. Flammable Materials Operations, Grounding and Bonding Procedures
- E. Drum Shipments (Blocking and Bracing, Labels, Drum Condition)
- F. Rolloff And Dump Trailer Operations
- G. Spill Containment and Control Procedures
- H. Spill Equipment
- I. Personal Protective Equipment
- J. Used Oil Halogen Testing

IX. Question and Answer Period

Upon completion of the Training Program, each driver is given the following material:

1. Emergency Response Guidebook (Signed Receipt Required)
2. Hazardous Materials Pocket Guide (Signed Receipt Required)
3. Federal Motor Carrier Safety Regulations (Signed Receipt Required)
4. Handling Hazardous Materials (ATA Department of Safety)
5. Hazardous Waste Manifest Template (FCI)
6. Certificate of Training
7. Photo ID Card with Certifications / Qualifications listed

FREEHOLD CARTAGE, INC.
EMERGENCY SPILL MANAGEMENT
FACILITY PLAN

I. FACILITY IDENTIFICATION

Type of Facility:	Truck Terminal with 10 day Storage and Transfer Facility Portion of a Waste Control Firm.
Location of Facility:	175 Bartow Municipal Airport Bartow, FL 33830 Phone: (863) 533-4599 Latitude: 27, 57', 15" Longitude: 81, 46', 40"
EPA Designation:	NJD 054 126 164 FLD 984 187 831
Owner/Operator:	Thomas J. Blanchet II President
Address of Owner/Operator:	P.O. Box 5010 Freehold, NJ 07728
Designated Person Accountable for Spills/Emergencies:	Michael Hirst 439 Archaic Drive Winter Haven, FL 33880 Cell Phone: (863) 287-1830
2nd Designated Person Accountable for Spills/Emergencies:	John Peterson 243 Eagle Lake Loop Drive East Winter Haven, FL 33880 Cell Phone (863) 287-9109

RECORD OF AMENDMENTS

As set forth in 40 CFR 112.5 (b) and 264.54, this SPCC/Emergency Management Plan shall be reviewed and/or amended, if necessary, when ever:

1. Required by the Environmental Protection Agency (EPA) after review of the plan which was submitted after an incident.
2. Applicable regulations are revised.
3. The plan fails in an emergency.
4. There is a change in the design of the facility, construction, operations, or maintenance which materially affects the potential for an incident.
5. The list of Responsible Persons or Coordinators changes.
6. The list of Emergency Equipment changes.

The plan shall be reviewed at least once every 3 years and shall be amended if such review indicates more effective control and prevention technology will significantly reduce the likelihood of an incident. Future amendments to this plan shall be recorded in this section as follows:

ACTION TAKEN	REASON	DATE	REMARKS
Revised SPCC/Emergency Management	Additional Information Needed	02/13/92	
Additional Record Requirements	Change in Regulation	02/13/92	Logging Into & Off Site
Revised Pollution Control Equipment	Change in Equipment	02/13/92	
Change in Responsible Party	Retirement	04/07/94	
Changes in Responsible Party	Reorganization	01/30/95	
Add Responsible Party	Review of Plan	01/30/97	

ACTION TAKEN	REASON	DATE	REMARKS
Revised Site Plan	Addition of New Containment Pad	08/07/97	
Revised Site Plan	Addition of New Loading Dock & Canopy	11/30/98	
Change in Responsible Party	Reorganization	04/01/99	
Revision of Primary Emergency Responder	As Requested	04/01/99	
Revised Site Plan	Addition of New Office Building	11/01/99	
Revised Secondary Emergency Contact	Reorganization	03/01/00	
Revised Secondary Emergency Contact & Telephone Numbers	Reorganization	09/09/01	
Revised Emergency Telephone Numbers	As Requested	09/19/01	
Revised Site Plan	Addition to Containment Pad	01/15/02	
Revised Primary & Secondary Emergency Contacts & Telephone Numbers	Reorganization	09/18/03	
Revised Primary Contact & Telephone Number	Personnel Change	10/21/04	
Revised Responsible Party	Personnel Change	11/01/04	Requested After Review
Revised Secondary Contact Added 3 rd Contact	Personnel Change	11/05/04	

Revised 3 rd Contact	Personnel Change	10/30/07
Revised Emergency Contact List	Personnel Change	10/01/08
Revised Secondary Contact	Personnel Change	08/13/09
Revised Paragraph III (A)(2)	Additional Notification	08/06/10

ENVIRONMENTAL POLICY

The purpose of this policy statement is to reaffirm the policy of our Corporation, with regard to the protection of the environment.

It is hereby, the policy of Freehold Cartage, Inc.

To take all practical measures necessary to prevent or abate air, water, and solid waste pollution resulting from its operation.

To insure that qualified personnel, with clearly defined responsibilities and commensurate authority, are assigned to bring and keep pollution under control.

To cooperate fully with all Government Agencies in pollution abatement activities.

To conduct appropriate research and engineering investigations in air and water quality control, and to encourage such research by others outside the Company.

To contribute to the development of sound, equitable, and realistic standards, laws and ordinances.

To maintain a close liaison with organizations involved in pollution abatement, with a view toward improving the Company's environmental program and relationship with its neighbors.

To participate with other companies, organizations and the public in efforts to enhance the quality of the environment in our Community.

To inform our Employees and the Public of our Company's efforts toward environmental control.

To maintain close liaison with organizations and regulatory agencies engaged in the abatement of pollution problems, with a view toward constantly improving the Company's environmental program.

It is the obligation of every Employee of Freehold Cartage, Inc. to adhere to the spirit as well as the letter of this Environmental Control/Emergency Management procedure.

DESCRIPTION OF OPERATION

Freehold Cartage, Inc. is in the business of transporting hazardous and non-hazardous waste from the generators of these wastes to regulated recovery or disposal facilities. In the process of transporting this material, Freehold Cartage, Inc., utilizes van trailers, tank trailers, roll-off trailers and straight trucks. All trucks are equipped with a spill kit where absorbent pads, sealant, shovels and other safety gear is stored.

Normal operation is for a truck to leave the site and pick up waste from one or multiple generators. In some instances, the waste may be brought to the yard. Drums may be transferred from one truck to another for shipment to the facility that has been designated by the generator to receive the waste. At no time will a drum be placed on the ground.

Freehold Cartage, Inc. has permits to pick up and transport waste hazardous materials in forty-eight states. 85% of its business is interstate. Waste transported includes:

ALL RCRA WASTE CODES
POLYCHLORINATED BIPHENYLS
UNIVERSAL WASTE
USED OIL

II. INTRODUCTION AND INTENT OF THIS SPCC/EMERGENCY MANAGEMENT PLAN

The purpose of this plan is to develop, document, implement, and maintain a thoroughly engineered facility designed not only to prevent hazardous substance spills, but in the event of a spill, to minimize the loss of product and subsequent damage to the environment. Contingency plans incorporated in this document will outline the response steps to be taken to minimize the impact of a spill in the environment and to facilitate cleanup.

The Freehold Cartage, Inc., facility is located within the confines of Bartow Air Base, Bartow, Florida. The site is 2.75 acres with a concrete containment parking pad, one office trailer and a storage shed. Incorporated with the containment pad is a 12 x 42 covered loading dock. The lot size is approximately 500' x 225'. The address is 175 Bartow Municipal Airport.

Hazardous and non-hazardous wastes are occasionally stored on trucks for shipment to disposal sites. Any loaded truck containing hazardous waste is parked on the containment pads while it is in this facility. No drums are placed in ground storage nor is bulk material placed in holding tank for transfer.

This maintenance and contingency plan includes programs for employee training, regularly scheduled inspections, and the incorporation of fail safe systems.

It is the intent of Freehold Cartage, Inc. to take all practical measures to prevent or abate air, water, and solid waste pollution resulting from its operation. It should further be noted that management will comply and cooperate fully with all Governmental Agencies charged with pollution control. Qualified, Trained Personnel, with clearly defined responsibilities and commensurate authority are assigned to administer this program and to prevent any environmental incidents.

INSPECTIONS AND RECORDS

Inspections of the site are conducted each week by Mr. Michael Hirst or his designate according to the attached written procedures. A log of these inspections is kept in the Main Office and entries are initialed by the inspector.

Reports of environmental incidents, personnel training, regulatory agency inspections, and efforts made to enhance environmental control are also kept in the Main Office.

A log of all materials coming onto the site prior to shipment to a disposal facility will be maintained with the following information:

Generator	Date In
Manifest Number	Number of Containers
Destination	Trailer Number
Date Out	

A copy of this Contingency Plan will be located in the Drivers trailer and in the Main Office Building.

III. INTERNAL CALL LIST/EMERGENCY PROCEDURES

U.S. EPA Regulations define a hazardous substance release as the discharge of any material which could create a potential human health or environmental hazard outside of the facility. This would include the discharge of an oily or hazardous material into any navigable waterways and/or the contamination of any drinking water supply by a hazardous substance. Contaminated ground water could also seep, leach or flow into navigable water.

An important facet of an effective response procedure during a substance release incident is to keep it separated from water and/or to minimize its spreading and the resulting increase in human/environmental exposure. Every effort should be made to emphasize substance containment at

the source rather than to have to resort to separation of the materials from expanded portions of the environment or downstream water.

A proper cleanup of any spill will usually involve the following procedures:

A. DETECTION

1. Upon the detection of a release, the PLAN environmental coordinator or his designate, shall be notified as soon as the immediate measures necessary are taken to prevent the spread of pollution to the environment.

PRIORITIZED CALL LIST

Michael Hirst	(863) 533-4599	Office
	(863) 287-1830	Cell Phone
John Peterson	(863) 519-5013	Office
	(863) 287-9109	Cell Phone

2. Mr. Hirst shall then notify the proper agencies listed on the external call list as deemed necessary according to the written reporting procedures. If neither the Coordinator, his designate, or person in charge of the office can be reached, the proper authorities and/or response center shall be notified by the person on the Scene according to this spill plan. Additionally, the Primary Spill Contractor, American Compliance Technologies, Bartow, FL will also be notified and requested to respond to the spill.

B. STOP SPILL SOURCE

If not already done as part of the 1st line response, assure that the source of the leak or spill is determined and additional spillage curtailed. Utilize personal protective equipment as necessary for the job.

C. CONTAIN SPILL

Rapid containment of the spill will hasten and simplify cleanup. Absorbent material floor dry, oil booms, shovels, dirt, etc. shall be utilized as appropriate.

D. PICK UP POLLUTANTS

After containment, the pollutant shall be picked up utilizing a vacuum truck if one is on site. Otherwise, portable pumps, or other appropriate means, shall be used to transfer the material to 55 gallon steel drums or other proper containers for disposal.

E. CLEANUP

After as much of the pollutant as possible has been picked up, the spill residue will be cleaned up utilizing available absorbent materials. Contaminated soils shall be removed and disposed of at an authorized disposal site, and other surfaces shall be decontaminated.

IV. EXTERNAL CALL LIST/REPORTING PROCEDURES

REPORTING PROCEDURES

All possible information shall be obtained so no delay in notification will result. The following information is required:

1. Name, title, telephone number, and address of reporter.
2. Name, telephone number, and address of facility/spill.
3. Time and type of incident.
4. Amount and type of materials involved.
5. The extent of injuries/illness if known.
6. The possible hazards to human health and environment.
7. Any bodies of water involved.
8. Cause of accident/spill.
9. Action taken or proposed by facility/personnel.

R.Q. Spills, National Response Center	(800) 424-8802
Disaster Response Center, Florida	(904) 488-1320
Decontamination Information, Chemtrec	(800) 424-9300
FCI Division Office, Bartow, Florida	(863) 533-4599
FCI Corporate Office, Freehold, NJ	(732) 462-1001
American Compliance Technologies	(800) 226-0911 Primary
O & H Materials, Inc.	(904) 394-2196
Polk County Firehouse (District #2)	(863) 534-1557

Florida State Police	(863) 686-2164
Polk Sheriff's Office	(863) 533-0344
Public Safety Division	(863) 533-2105
DEP, Temple Terrace, Florida	(813) 632-7600
U.S. Coast Guard	(305) 350-5276

V. POTENTIAL SPILL SOURCES

SOURCE	CAUSE	QUANTITY	DIRECTION OF FLOW	MATERIAL
Truck (Load)	Rupture/Leak Valve Damage	Less than 7,000 gallons per Truck	Containment Pad	Hazardous & Non-hazardous Wastes
Truck (Fuel)	Rupture/Leak Line Damage	Less than 200 gallons per Truck	Variable	Diesel Fuel Gasoline
Drum	Leak/Damage	less than 55 55 gallons	Truck Liner Containment Pad	Hazardous & Non-hazardous

VI. SPILL PROTECTION MEASURES FOR SPECIFIC SOURCES

Area 1 – Containment Pad 10,000 Gallon Capacity
 Area 2 – Containment Pad 15,600 Gallon Capacity

Past Spills – None

Possible Cause of Future Spills: Leakage, Rupture

Existing Protection Measures:

1. Always 2 Personnel in Area
2. Visual Inspections of Trucks
3. Spill Control Supplies in Area
4. Emergency Warning Horn

5. Employee Training
6. 1,100 Gallon Holding Tank
7. Pumping Truck

Area 2 – Truck Parking

Past Spills – None

Possible Cause of Future Spills: Fuel Tank Rupture or Leak

Existing Control Measures:

1. Strict rules ensure loaded Hazardous Waste trucks are on pad. Employee Training backed with corrective discipline.

Area 3 – On the Road During Pick Up/Deliveries

Existing Control Measures:

1. Contingency Plan on all vehicles and in office In-transit contingency plan on all vehicles and in Office.

VII. FIRE OR EXPLOSION

All drums collected from Generator for shipment to disposal facilities remain inside trailers. No drums at any time are removed from that unit to be placed on the ground. In the event of a fire, it should be contained in that unit.

The Standard operational procedures in the event of a fire will be as follows:

- a. Notify all personnel on site and contact the base fire department, informing them of the materials on the trailer. The Sheriff's Office will be informed for traffic control.
- b. Emergency Coordinator will make an immediate assessment of the situation and utilize available fire fighting equipment to extinguish the fire if possible.
- c. Concurrently, the coordinator will have any other trailers removed from the site using the evacuation routes as previously determined and have all nonessential personnel leave the site.
- d. The Coordinator will inform the incident Commander upon arrival of the materials in the trailer and any other information to assist in determining possible hazards to human health or the environment that may result from the incident and require evacuation of surrounding areas.
- e. Immediately after an emergency, the emergency coordinator must provide for treatment, storing or disposing of the recovered waste, contaminated soil or surface water.

- f. All emergency equipment used on the incident is cleaned and fit for its intended use.
- g. Reporting procedures will be completed as outlined on EXTERNAL CALL LIST/REPORTING PROCEDURES.

EVACUATION PLAN

In the event that it is necessary to leave the facility, a warning will be given over the P.A. system to begin evacuation. Trucks will immediately leave through either the east or west gate on First Street. The Primary route will be east on First Street to Ben Durrance Road and the Secondary Route will be going west on First Street and park all vehicles on the west side of the air base.

Office Personnel will evacuate on the same routes upon the sounding of an alarm. (Pages 11, 12, 13)

VIII. POLLUTION CONTROL EQUIPMENT ON SITE

EQUIPMENT	STORAGE LOCATION
Shovels and Rakes	Storage Shed and Loading Dock
Floor Dry Absorbent	Storage Shed and Loading Dock
Vacuum Truck, One Minimum 3,000 Gallons	
First Aid Kits	In All Trucks, Main Office, Loading Dock
Absorbent Pads, 24"x24"x3/4 (Sorbent-Silicate)	Storage Shed and Loading Dock
Tri-reflectors, Miscellaneous Safety Equipment	On All Trucks
Personal Protective Equipment	On All Trucks, Drivers Office, and Loading Dock
Boots	On All Trucks and Storage Shed
Fire Extinguishers 10lb. ABC	1 - Containment Pad, 1 - Drivers Office, 1 - Main Office, 1 - Loading Dock
Respirators and Filters, APR (Organic Vapors, Acid, Ammonia)	Loading Dock, All Trucks, Storage Shed
85 Gallon Steel Recovery Drums	Containment Pad and All Trailers

Safety Shower and Eyewash

Loading Dock

Person responsible for maintenance of Spill/Emergency Response Materials: Mr. Michael Hirst

IX. SITE SECURITY

Freehold Cartage, Inc, is located on a corner lot at the Bartow Air Base, Bartow, FL. A six foot high security fence surrounds the facility with entrance and exit gates. The fence is posted with signs that read: "DANGER: UNAUTHORIZED PERSONNEL KEEP OUT". And "HAZARDOUS MATERIALS STORAGE". Two pole lights provide adequate lighting in the evening and night time hours. A Security Guard patrols all areas of the base between the hours of 3:00 P.M. and 7:00 A.M. and the site is located within a mile of Polk County Fire District #2 Firehouse located on the air base.

X. PERSONNEL TRAINING IN ENVIRONMENTAL PROCEDURES

All Freehold Cartage, Inc. employees are properly trained in the following:

- a. Operation and maintenance of equipment they must use, and equipment necessary to the prevention or cleanup of environmental spills.
- b. Location of pollution abatement equipment.
- c. Content of all applicable Safety, Health, Personnel Training, and Environmental Regulations.
- d. All Safety, Health and Environmental procedures in effect at Freehold (these include emergency response procedures).
- e. Methods used to avoid environmental incidents/emergencies and the contents of the Emergency/Spill Management Plan.

NOTE: ALL GENERAL FACILITY RULES ARE STRICTLY ENFORCED, SUCH AS:

No Smoking in Operations area or around trucks
All Drivers **MUST** complete pre-trip inspection before all trips
All Employees **MUST** attend safety and environmental control meetings
All trucks loaded with Hazardous Waste **MUST** be parked on the containment pad.
All spills of any kind **MUST** be immediately attended to and reported to management
Wearing of proper personal protective equipment for job is mandatory
And similar rules as noted on rules poster

ALL FACILITY RULES ARE STRICTLY ENFORCED THROUGH THE USE OF DAY TO DAY SUPERVISION, GUIDANCE, AND CORRECTIVE DISCIPLINE.



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Refresher training is also provided annually to each of these employees and includes: 8-hour Hazwoper Training, review of Hazardous Waste regulations and FL DEP requirements for Used Oil and Universal Wastes.

A copy of the training outline is available upon request.

FREEHOLD CARTAGE INC.