ADVANCED ENVIRONMENTAL TECHNOLOGY CORPORATION

CONTINGENCY PLAN AND EMERGENCY PROCEDURES

4317 L Fortune Place

West Melbourne, Florida

The following Contingency Plan has been prepared for the AETC Transfer Facility located at 4317 L Fortune Place and is designed to minimize hazards to human health and the environment from fires, explosions, or any unplanned sudden or nonsudden release of hazardous waste to air, soil, or water. A copy of the contingency plan and all revisions will be maintained at the facility and will be submitted to all local police departments, fire departments, and state and local emergency response teams.

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I. IMPLEMENTATION OF THE CONTINGENCY PLAN

The provisions of the Contingency Plan shall be implemented whenever emergency situations arise which endanger public health and safety or the environment.

II. REVISIONS TO THE CONTINGENCY PLAN

The Contingency Plan shall be periodically reviewed and updated as necessary. As a minimum, this shall occur when:

1. Applicable regulations are revised;
2. The plan fails in an emergency;
3. The mode of operation changes in a manner that materially increases the potential for fires, explosions or releases of hazardous constituents, or changes the response necessary in an emergency;
4. The list of emergency coordinators changes;
5. The list of emergency equipment changes; or
6. As required by the Department.

III. EMERGENCY REPORTING

In the event of an emergency or a hazardous waste spill during transportation, the transporter will immediately notify the Florida Department of Environmental Regulation and the National Response Center with the following information:

1. Name of the person reporting the incident;
2. Name, address, and the EPA identification number of the transporter;
3. Phone number where the person reporting the incident can be reached;
4. Date, time, and location of the incident;
5. Mode of transportation and type of transport vehicle;
6. A brief description of the incident, including the type of incident;

7. Any injuries involved.

8. For each waste involved in the spill:

   a. The name and EPA identification number of the generator of the waste;

   b. Shipping name, hazard class and UN or NA number of the waste;

   c. Estimated quantity of the material or the waste spilled;

   d. The extent of the contamination of land, water, or air;

9. Shipping name, hazard class, and the UN or NA number of any other material carried.

In the event of an emergency or hazardous waste spill during transportation, the transporter will immediately notify the affected municipality of the occurrence and the nature of the spill.

The transporter will submit a report of the incident in writing as required by 49 CFR 171.16 to the Chief, Information System Division, Transportation Programs Bureau, Department of Transportation, Washington, DC 20590, and send copies of the report to the Florida Department of Environmental Regulations.

IV. LIST OF EMERGENCY RESPONSE AGENCIES

Florida Department of Environmental Regulation
(904) 488-0300

National Response Center
(800) 424-8802

Florida Local Police and Fire Departments
911 or O (Operator)

V. LIST OF EMERGENCY COORDINATORS

The following is the list of emergency coordinators who have been given the responsibility for coordinating all emergency response measures and will have the authority to commit the resources to carry out the Contingency Plan. Listed in the descending order upon which they would be called, each coordinator will be thoroughly familiar with all aspects of the Contingency Plan, all operations and activities at the site, the location and characteristics of waste handled, and the location of all records within the site and the site layout.

At all times there will be at least one employee either on the facility's premises or on call with the responsibility for coordinating all emergency response measures.

EMERGENCY COORDINATORS:

PRIMARY:
Roger Thomas
(407) 722-2455 (work)
(407) 773-6970 (home)

SECONDARY:
Barry Hamilton
(407) 722-2455 (work)
(407) 722-3826 (home)
(407) 763-4574 (pager)

DUTIES AND RESPONSIBILITIES OF EMERGENCY COORDINATOR

Whenever there is an imminent or actual emergency situation, the emergency coordinator must immediately:

1. Activate alarms or communication systems where applicable to notify site personnel;

2. Notify local emergency response agencies.

Whenever there is an emission, discharge, fire or explosion, the emergency coordinator must immediately identify the character, exact source, amount and extent of emitted or discharged materials. He may do this by observation or review of records and, if necessary, by chemical analysis.

At the same time, the emergency coordinator must assess possible hazards to human health and the environment that may result from the emission, discharge, fire or explosion. If the determination is made that human health or environment are threatened, the emergency coordinator must immediately notify the **FLDER (904) 488-0300** and the **National Response Center (800) 424-8802** by telephone and report the information listed in Section III.

During an emergency, the emergency coordinator must take all measures necessary to ensure that the emission, discharge, fire or explosion does not occur, re-occur, or spread to other materials at the facility. These measures shall include, where applicable, stopping operations, collecting and containing released materials and removing or isolating containers. The emergency coordinator must ensure that adequate monitoring is conducted for leaks, pressure build up, gas generation or ruptures of containers wherever appropriate.

Immediately after an emergency, the emergency coordinator with approval from FLDER, must provide for treating, storing, or disposing of residues, contaminated soil, etc., resulting from the incident. The emergency coordinator must ensure that, in the affected areas, no incompatible materials are treated, stored, or disposed of until clean-up procedures are completed, and all emergency equipment is cleaned and fit for its intended use prior to resuming operations.

CHAIN OF COMMAND:

1. Facility Branch Manager
2. Facility Operations Manager
3. V.P. Corporate Operations
4. V.P. Corporate Regulatory Affairs

VI. LIST OF EMERGENCY RESPONSE CONTRACTORS

Provided below is a list of emergency response contractors with whom arrangements have been made for the performance of contractual services on short notice:

OHM Corporation
13400 Mohawk Road
Clermont, FL 34711
(904) 394-8601 or (800) 537-9540
Services: Spill Response/Clean Up, Hazardous Waste

Advanced Environmental Technology Corporation
2176 Will Suitt Road
Creedmoor, NC 27522
(919) 528-3996
Services: Spill Response/Clean Up, Hazardous Waste Transportation

Environmental Transfer Corporation
3 Gold Mine Road
Flanders, NJ 07836
(201) 347-7111
Services: Hazardous Waste Transportation

It should be noted that both AETC and ETC are well known and respected emergency response contractors. As response contractors, personnel are fully trained in emergency response procedures and emergency clean-up operations. Therefore, in the event of an emergency situation, qualified personnel would be readily available and equipped to respond.

VII. LIST OF EMERGENCY EQUIPMENT

The following is a list of emergency equipment, along with their location, that will be maintained at the AETC transfer facility in the event of a spill or emergency. Protective clothing including a filter mask or a respirator and a first aid kit with eyewash apparatus will be carried on the transport vehicle. Absorbent material or mats will be carried on the transport vehicle when liquids are transported. It should be noted that only containers of 119 gallons or less will be transported through the AETC Transfer facility.

All equipment shall be tested and maintained as necessary to assure its proper operation in time of an emergency. After an emergency, all equipment shall be decontaminated, cleaned, and fit for its intended use before normal operations resume.

EQUIPMENT	PHYSICAL DESCRIPTION
Vermiculite	A non-combustible inert packaging and adsorption material used to assist in spill containment and spill clean-up.
Speedi-Dry	A non-combustible inert packaging and absorbent material used to assist in spill containment and spill clean-up.
Absorbent Pads, Booms & Sweeps	A synthetic fiber material specifically designed to absorb oils and hydrocarbons. Used for spill containment and clean-up.
Telephone	Used to report a fire, spill, or other emergencies to proper authorities
Portable Generator	In the event of loss of power, the generator would provide lights and power for pumps and tool used during an emergency such as a leak spill, fire, etc.
First Aid Kits	Used for the treatment of minor injuries
Disposable Protective Clothing	Acid and solvent resistant disposable clothing to protect personnel from hazardous material and provide for easy decontamination
Portable Lighting	To provide lighting in the event of a power outage or electrical malfunction
Shovels, Brooms	Used for spill clean-up materials or spill solid

VIII. EMERGENCY RESPONSE PROCEDURES

Potential accidents fall under two general classifications: Fire and/or explosions; and spills or material release.

FIRE AND/OR EXPLOSION

Container storage areas can be easily accessed by fire-fighting and other emergency vehicles and equipment. The trailer parking areas will be kept clear at all times. Site personnel receive training in fire-fighting as part of the overall personnel training program.

During times of power failure or severe weather, fire prevention personnel will be assigned to protect AETC personnel and property. If a fire should break out, efforts will be placed on preventing the fire from spreading to nearby areas. AETC personnel will attempt to reduce the hazards of the fire until outside assistance arrives.

The following actions will be taken in the areas affected by the fire or explosion:

1. Operations will be shut down immediately;
2. The emergency coordinator will be contacted;
3. The area will be cleared of all personnel;
4. All injured personnel will be removed and medical treatment will be administered by qualified personnel.

Fire-fighting will not be done at the risk of injury to the persons involved; however, early containment of fires can significantly decrease total damage. Area evacuation will be necessary in case of major fire or explosion. Specifics are outlined under general evacuation procedures. All personnel have been trained in evacuation procedures and means of exit from their respective work areas.

Until evacuation is signaled, personnel who are not in an affected area will stay in their respective work areas. Contract personnel and visitors will be cleared from the area and instructed to report to a designated meeting place.

When the fire has been extinguished and the safety of personnel is no longer endangered, an "all clear" signal will be given verbally by the emergency coordinator. All emergency equipment used in the emergency will be cleaned and fit for use prior to resumption of operations in the affected areas.

SPILL OR MATERIAL RELEASE

If an employee discovers a chemical spill, he or she will immediately report it to the area supervisor. The area supervisor will contact the emergency coordinator at the time of the incident.

When contacted, the emergency coordinator will obtain the following information:

1. The material spilled or released and its location;
2. An estimate of quantity released and the site at which it is being released;
3. The direction in which the spill, vapor or smoke release is heading;
4. Any injuries involved;
5. Fire and/or explosion or possibility thereof;
6. The areas affected and the intensity of the fire or explosion.

From this information, the emergency coordinator will assess the magnitude and potential seriousness of the spill or release. If the accident is determined to be within AETC's emergency response capabilities, the necessary site personnel will be contacted and deployed. If the accident is beyond AETC capabilities, the emergency coordinator will contact the appropriate authorities.

In the event of a leak or spill, released materials will be contained by booms located along the perimeter of the site. Container storage areas and the booms will be inspected daily for the signs of release.

Since only containers will be handled at the facility, the spill most likely to occur would be that involving a single container. The initial response to such an emergency would be to identify, isolate, contain and treat the leaking container and spilled material. For spills occurring on a trailer, the trailer will be emptied of all containers to assist in the clean-up and decontamination process.

Most small spills and leaks will be easily contained within the immediate area. Upon direction of the emergency coordinator, clean-up personnel will use absorbent pads, booms, or other inert materials to contain and clean up a small spill. All containment and clean-up materials will be placed in drums for proper disposal.

Since materials are accepted in non-bulk containers only (less than 119 gallons and typically not over 55 gallons) and containers are never opened, the chance of a large spill is remote. However, should a spill occur it would be contained within the trailer containment system. Spilled material will be collected either by a portable suction pump or absorbed in pads , booms or other inert materials. All clean-up areas including the trailer and the emergency equipment will be decontaminated and fit for use following a spill incident.

The emergency coordinator is responsible for determining which emergency situations require facility evacuation. A telephone system will be used to notify key facility personnel as the nature of the emergency and the recommended plan of action. Both automatic and manual fire alarms will be located at critical areas in the site. All applicable employees will be familiar with alarm box locations.

In the event a site evacuation is called for by the emergency coordinator, the following actions will be taken:

1. The call for evacuation will be given. This will be achieved either with the use of the internal communications systems or by voice, whichever is most expedient.

2. All personnel, visitors and contractors will immediately leave through the designated evacuation routes.

3. No further entry of visitors, contractors, or trucks will be permitted. All vehicle traffic within the facility will cease to allow safe evacuation.

4. All persons will be accounted for by their immediate supervisors. No attempt to find persons not accounted for will involve endangering lives of others by re-entry into emergency areas.

5. Re-entry into emergency areas will be made only after clearance is given by the emergency coordinator. At his direction, a notification will be given for re-entry into the site.

IX. EXTERNAL COMMUNICATIONS

The telephones which are located at the AETC Transfer facility would be used to contact emergency response agencies if an emergency situation should arise. Additionally, the transporter will use public phones and/or CB radios to contact the emergency coordinator and/or notify the emergency response agencies.

X. ROUTINE DECONTAMINATION PROCEDURES

Routine decontamination procedures are not required for the transfer facility. The terminal and transportation is managed in such a way that there is no routine decontamination of storage containers, processing equipment, trucks and loaders. The reasons for this are as follows:

1. No containers are opened at the transfer facility or on any of the trailers.

2. No pumps, vacuum trucks or roll-offs are utilized. Everything is handled in manageable containers which are DOT acceptable.

3. All materials go through quality control to ensure that all containers are in good condition and that the materials are compatible with the container in which they are stored.

4. A majority of containers are packaged laboratory chemicals (pack labs). Pack labs are DOT specified drums or other containers, containing inside packages of waste chemicals, chemical compounds and samples which are packaged in enough absorbent material to absorb all the liquids contained in the inside packages.

5. Any empty storage containers which would become contaminated would be handled as a hazardous waste. There would be no decontamination of containers.

XI. EMPLOYEE TRAINING PROGRAM

It is AETC's policy that each employee handling chemical substances respect them and be aware of their potential hazards. In keeping with that objective, a training program has been developed to ensure transportation personnel can perform their duties safely and are able to respond to emergencies.

During the training program, new and existing employees receive instruction on the following:

1. Knowledge of the materials being transported;

2. Safety and health hazards associated with materials being transported;

3. Practices for preventing spills;

4. Procedures for responding properly and rapidly to spills;

5. Emergency procedures (i.e., use of contingency plan, first aid);

6. Use of emergency equipment.

Additional training is given in the compliance of environmental regulations, proper identification, classification and packaging of wastes, and proper handling and storage procedures.

AETC's comprehensive training program consists of the following:

1. New personnel complete a 4 1/2 day, 36-hour program, which covers the topics discussed above.

2. A 4 day, 32-hour follow up is given eight (8) weeks after the initial orientation.

3. Weekly training sessions reviewing all areas are given to all personnel.

AETC CLOSURE PLAN

4317 L Fortune Place, West Melbourne

This closure plan has been prepared in accordance with Florida Hazardous Waste Rules 17-730.171(2)(b) for the transfer facility at 4317 L Fortune Place, West Melbourne, Florida. AETC operations at this facility involve the temporary storage of hazardous wastes in DOT approved containers in trailers. These materials are under manifest and intransit to an authorized hazardous waste disposal facility. There are no treatment or storage activities inside the warehouse in conjunction with the transfer facility operations. All waste materials remain in closed containers inside trailers while at the facility.

Closure Performance Standard

AETC, as the operator of the 4317 L Fortune Place facility will implement closure under the following procedures:

A. Notify the Florida Department of Environmental Regulation of AETC's intent to close the facility.

B. Cease acceptance of shipments of hazardous waste at the facility by redirection of materials to an alternate hazardous waste facility.

C. Transport the current inventory of waste materials on the trailers in which they are contained to the treatment facility as designated on the manifest. This will occur within the maximum 10 day intransit time allowed. The maximum inventory of containers intransit at the facility will be two hundred sixty-four (264), 55 gallon drum equivalents. These DOT approved containers will be stored in a maximum of 3 trailers.

D. Inspect the concrete paved area where the trailers were parked for evidence of spills. This visual inspection will be followed by sampling, should there be evidence of a spill or release.

E. Upon detection of contaminants from sample analysis, AETC will remediate the contaminated area. The remediation activities utilized will depend on the extent of the contaminated area as well as the type of contaminants detected. Surface contamination will be removed by steam washing. All wash waters will be collected, sampled, analyzed and disposed in accordance with applicable state and federal regulations. Should subsurface contamination exist, all contaminated concrete and/or soil will be removed, containerized and transported off-site for disposal in accordance with all applicable state and federal regulations. Following remediation, resampling and analysis of the affected area will be performed to assure the contamination has been reasonably removed.

F. Remove all empty trailers and vehicles from the property along with the warehoused packaging materials, empty containers and miscellaneous equipment.

G. Remove all permanently mounted warning signs.

H. Submit the appropriate certification of closure activities to the Florida Department of Environmental Regulation.

Amendments to the Closure Plan

Should AETC deem it necessary to amend the closure plan due to changes in operations or facility design, the department will first be notified in writing of such modifications. The written notification will include a copy of the amended closure plan for approval. Closure plan changes will not be implemented until department approval is obtained.

Certification of Closure

Upon completion of closure of the transfer facility, AETC will notify the department in writing. This written notification will include a certification that the transfer facility has been closed in accordance with the specifications in the approved closure plan. The certification will be signed by the operator of the facility and an independent registered professional engineer.