CBI

Cliff Berry, Incorporated
Environmental Services

December 11, 2017

Bryan Baker, P.G.
Hazardous Waste Regulation
Florida Department of Environmental Protection (FDEP)
Twin Towers Office Building
2600 Blair Stone Road
Tallahassee, Florida 32399-2400

RE: Cliff Berry, Inc. – Canaveral Facility
EPA ID Number: FLR 000 119 792
Renewal of Used Oil Processing Facility Permit Number: 249477–HO-002

Dear Mr. Baker,

Please find enclosed, CBI's renewal request to Used Oil Processing Facility Permit Number 249477–HO-002. We look forward to your review and approval. I am still awaiting Engineer approval due to the fact that our historical engineer, David M. Ambrose has retired. I had to interview several engineers and have settled on a new firm to review our documents. The engineer is visiting our facilities this week to confirm that my application is true and correct. Therefore, the engineer's certification is not enclosed at this time, but will be sent as soon as it is complete.

The following is a list of documents contained herein:

- Payment of $2,000 renewal fee
- Application for Used Oil Processing Facility Permit & Attachments
- SPCC Plan
- Financial Assurance
- Site Drawings

Please contact me if you have any further needs or requests for information.

Sincerely,

Kelly Brandenburg
Manager - Regulatory Affairs and Special Projects
Fort Lauderdale, FL 33316
(954) 763-3390 Office Ext 1005
(954) 763-8375 Fax
compliance@cliffberryinc.com

USED OIL PROCESSING FACILITY PERMIT APPLICATION

Part I

TO BE COMPLETED BY ALL APPLICANTS (*Please type or print*)

A. General Information

1. New_____ Renewal X _____ Modification _____ **Date current permit expires** 2/5/2018

2. Revision number 3

3. NOTE: Used Oil Processors must also meet all applicable subparts, **(describe compliance in process description for applicable standards)** if they are:

_____ Generators (Subpart C of Part 279)
X Transporters (Subpart E)
_____ Burners of off-spec used oil (Subpart G)
X Marketers (Subpart H)
_____ are disposing of used oil (Subpart I)

4. Date current operation began: 2/5/2008

5. Facility name: CLIFF BERRY, INC. - CANAVERAL FACILITY 5855 Industrial Dr, Cocoa, FL 32927

6. EPA identification number: FLR 000 119 792

8. Facility mailing address:

PO BOX 13079	FORT LAUDERDALE	FL	33316
Street or P.O. Box	City	State	Zip Code

9. Contact person: KELLY BRANDENBURG Telephone: (954) 763-3390

Title: REGULATORY AFFAIRS Email compliance@CLIFFBERRYINC.COM

Mailing Address:

PO BOX 13079	FORT LAUDERDALE	FL	33316
Street or P.O. Box	City	State	Zip Code

10. Operator's name: CLIFF BERRY, II Telephone: (954) 763-3390

Mailing Address:

PO BOX 13079	FORT LAUDERDALE	FL	33316
Street or P.O. Box	City	State	Zip Code

11. Facility owner's name: CLIFF BERRY, II Telephone: (954) 763-3390

Mailing Address:

PO BOX 13079	FORT LAUDERDALE	FL	33316
Street or P.O. Box	City	State	Zip Code

12. Legal structure:

X Corporation (indicate state of incorporation) FLORIDA
_____ Individual (list name and address of each owner in spaces provided below)
_____ Partnership (list name and address of each owner in spaces provided below)
_____ Other, e.g., government (please specify) _____

If an individual, partnership, or business is operating under an assumed name, enter the county and state where the name is registered: County ~~Brevard~~ N/A State _____

Name: _____
Mailing Address: _____
Street or P.O. Box City State Zip Code

Name: _____
Mailing Address: _____
Street or P.O. Box City State Zip Code

Name: _____
Mailing Address: _____
Street or P.O. Box City State Zip Code

Name: _____
Mailing Address: _____
Street or P.O. Box City State Zip Code

13. Site ownership status: [ ] owned [ ] to be purchased [ ] to be leased ____ years
[✓] presently leased; the expiration date of the lease is: Dec 31, 2019

If leased, indicate: Land owner's name: C-2 Holdings, Inc.
Mailing Address: PO Box 350123 FORT LAUDERDALE FL 33335
Street or P.O. Box City State Zip Code

14. Name of professional engineer _____ Registration No. _____
Mailing Address: _____
Street or P.O. Box City State Zip Code
Associated with: _____

B. SITE INFORMATION

1. Facility location:
County: Brevard
Nearest community: Cocoa
Latitude: 28° 27' 24.8" N Longitude: 80° 46' 17.8" W
Section: _____ Township: _____ Range: _____
UTM # _____/_____/_____/_____

2. Facility size (area in acres): 3.63

3. Attach a topographic map of the facility area and a scale drawing and photographs of the facility showing the location of all past, present and future material and waste receiving, storage and processing areas, including size and location of tanks, containers, pipelines and equipment. Also show incoming and outgoing material and waste traffic pattern including estimated volume and controls.

The facility's detailed process description is labeled as Attachment SEE C4, PAGE 3

C. OPERATING INFORMATION

1. Hazardous waste generator status (SQG, LQG, Etc.) N/A

2. List applicable EPA hazardous waste codes:

NONE

3. Attach a brief description of the facility operation, nature of the business, and activities that it intends to conduct, and the anticipated number of employees. No proprietary information need be included in this narrative.

A brief description of the facility operation is labeled as Attachment 1

4. A detailed description of the process flow should be included. This description should discuss the overall scope of the operation including analysis, treatment, storage and other processing, beginning with the arrival of an incoming shipment to the departure of an outgoing shipment. Include items such as size and location of tanks, containers, etc. A detailed site map, drawn to scale, should be attached to this description. [See item four (4), page four (4) of the instructions.]

The facility's detailed process description is labeled as Attachment 2

5. The following parts of the facility's operating plan should be included as attachments to the permit application. [See item five (5), page four (4) of the instructions.]

   a. An analysis plan which must include:
   (i) a sampling plan, including methods and frequency of sampling and analyses;
   (ii) a description of the fingerprint analysis on incoming shipments, as appropriate; and
   (iii) an analysis plan for each outgoing shipment (one batch/lot can equal a shipment provided the lots are discreet units) to include: metals and halogen content

   The analysis plan is labeled as Attachment 3

   b. A description of the management of sludges, residues and byproducts. This must include the characterization analysis as well as the frequency of sludge removal.

   Sludge, residue and byproduct management description is labeled as Attachment 4

   c. A tracking plan which must include the name, address and EPA identification number of the transporter, origin, destination, quantities and dates of all incoming and outgoing shipments of used oil.

   The tracking plan is included as Attachment 5

6. Attach a copy of the facility's preparedness and prevention plan. This requirement may be satisfied by modifying or expounding upon an existing SPCC plan. Describe how the facility is maintained and operated to minimize the possibility of a fire, explosion or any unplanned releases of used oil to air, soil, surface water or groundwater which could threaten human health or the environment. [See item six (6), page five (5) of the instructions.]

The preparedness and prevention plan is labeled as Attachment 6

7. Attach a copy of the facility's Contingency Plan. This requirement should describe emergency management personnel and procedures and may be met using a modifying or expounding on an existing SPCC plan or should contain the items listed in the Specific Instructions. [See item seven (7), page five (5) of the instructions.]

   The contingency plan is labeled as Attachment 7

8. Attach a description of the facility's unit management for tanks and containers holding used oil. This attachment must describe secondary containment specifications, inspection and monitoring schedules and corrective actions. This attachment must also provide evidence that all used oil process and storage tanks meet the requirements described in item 8b on page 6 of the specific instructions, and should be certified by a professional engineer, as applicable.

   The unit management description is labeled as Attachment 8

9. Attach a copy of the facility's Closure plan and schedule. This plan may be generic in nature and will be modified to address site specific closure standards at the time of closure. [See item nine (9), page six (6) of the instructions.]

   The closure plan is labeled as Attachment 9

10. Attach a copy of facility's employee training for used oil management. This attachment should describe the methods or materials, frequency, and documentation of the training of employees in familiarity with state and federal rules and regulations as well as personal safety and emergency response equipment and procedures. [See item ten (10), page seven (7) of the instructions.]

    A description of employee training is labeled as Attachment 10

APPLICATION FORM FOR A USED OIL PROCESSING PERMIT

PART II - CERTIFICATION

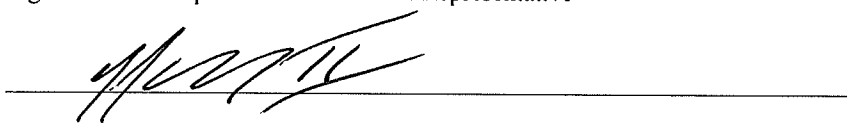
TO BE COMPLETED BY ALL APPLICANTS

Form 62-710.901(6) Operator Certification

Facility Name: CLIFF BERRY, INC. - Canaveral FACILITY EPA ID# FLR 000 119 792

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gathered and evaluated the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment or knowing violations. Further, I agree to comply with the provisions of Chapter 403, Florida Statutes, Chapters 62701 and 62-710, F.A.C., and all rules and regulations of the Department of Environmental Protection

Signature of the Operator or Authorized Representative*



Cliff Berry, II. - Chief Executive Officer

Name and Title (Please type or print)

Date: 12/11/17 Telephone: (954) 763-3390

* If authorized representative, attach letter of authorization.

APPLICATION FROM FOR A USED OIL PROCESSING PERMIT

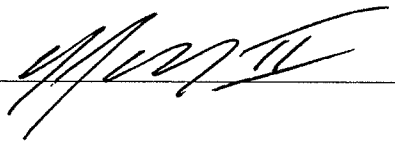
PART II - CERTIFICATION

Form 62-710.901(6) Facility Owner Certification

Facility Name: CLIFF BERRY, INC. - CANAVERAL FACILITY EPA ID# FLR 000 119 792

This is to certify that I understand this application is submitted for the purpose of obtaining a permit to construct, or operate a used oil processing facility. As the facility owner, I understand fully that the facility operator and I are jointly responsible for compliance with the provisions of Chapter 403, Florida Statutes, Chapters 62-701 and 62-710, F.A.C., and all rules and regulations of the Department of Environmental Protection.

Signature of the Operator or Authorized Representative*



Cliff Berry, II. - Chief Executive Officer

Name and Title (Please type or print)

Date: 12/11/17 Telephone: (954) 763-3390

* If authorized representative, attach letter of authorization.

APPLICATION FROM FOR A USED OIL PROCESSING PERMIT

PART II - CERTIFICATION

Form 62-710.901(6) Land Owner Certification

Facility Name: CLIFF BERRY, INC. - CANAVERAL FACILITY EPA ID# FLR 000 119 792

This is to certify that I, as land owner, understand that this application is submitted for the purpose of obtaining a permit to construct, or operate a used oil processing facility on the property as described.

Signature of the Operator or Authorized Representative*

Cliff Berry, II. - Chief Executive Officer

Name and Title (Please type or print)

Date: 12/11/17 Telephone: (954) 763-3390

* If authorized representative, attach letter of authorization.

APPLICATION FORM FOR A USED OIL PROCESSING PERMIT

PART II - CERTIFICATION

Form 62-710.901(6) P. E. Certification [Complete when required by Chapter 471, F.S. and Rules 62 - 4.050, 62-761, 62-762, 62-701 and 62-710, F.A.C.]

Use this form to certify to the Department of Environmental Protection for:

1. Certification of secondary containment adequacy (capacity), structural integrity (structural strength), and underground process piping for storage tanks, process tanks, and container storage.
2. Certification of leak detection.
3. Substantial construction modifications.
4. Those elements of a closure plan requiring the expertise of an engineer.
5. Tank design for new or additional tanks.
6. Recertification of above items.

Please Print or Type

_____ Initial Certification X _____ Recertification

1. DEP Facility ID Number: FLR 000 119 792 2. Tank Numbers: 1, 2, 3, 4, 5, 6, 7, 8, 9, 10, 11, 12, 13, 14, 15, 16

3. Facility Name: CLIFF BERRY, INC. - CANAVERAL FACILITY

4. Facility Address: 5855 INDUSTRIAL DR, COCOA, FL 32927

This is to certify that the engineering features of this used oil processing facility have been designed/examined by me and found to conform to engineering principles applicable to such facilities. In my professional judgment, this facility, when properly constructed, maintained and operated, or closed, will comply with all applicable statutes of the State of Florida and rules of the Department of Environmental Protection.

_____
Signature

_____
Name (please type)

Florida Registration Number: _____

Mailing Address: _____
Street or P. O. Box

_____
City State Zip

Date: _____ Telephone (___) _____

[PLEASE AFFIX SEAL]

Attachment 1

CLIFF BERRY INC. (CBI) – CANAVERAL FACILITY BUSINESS AND OPERATIONS PLAN

1 - The CBI Canaveral Facility currently operates in the Canaveral area as a Used Oil Transporter Facility and Transporter for Hazardous and Non-hazardous Waste, Oil and Chemical Spill Emergency Response, Tank Cleaning Services, Remediation Services and is currently registered with the Florida Department of Environmental Protection (FDEP) as such.

2 – Upon completion of the storage tank farm expansion, we will fully utilize our FDEP Used Oil Processing Facility Permit.

The following wastes will be accepted at the Canaveral Facility with their corresponding management method.

Waste	Volume (g/mos.)	Management Method	Testing	Generator type	Time at Facility
Used Oil	10,000	Stored, bulked and transferred waste without treating. Destined for recycling.	Halogen (sniffer or Q1000 test kits to check for <1000 ppm halogens)	Oil change operators. Gas stations. Garages. Other used oil generators. Self generated.	Several days, but <30 days
Petroleum Contact Water (PCW)	1,000	Stored, bulked and transferred waste without treating, or recovery.	Generator knowledge from source that meets definition of PCW.	Gas stations. Oil terminal operators. Bulk tanks. Other PCW generators.	Several days, but <30 days
Oily Water	280,000	Stored, bulked and transferred waste without treating.	Generator knowledge/ process knowledge	Ships, vessels, tug bilges, shops.	Several days, but <30 days

3 – CBI operates five other locations in Florida:

The CBI Miami Facility serves as CBI's main processing facility for Wastewater and Used Oil. The facility operates under EPA regulations as a Wastewater Pretreatment Subpart D Multiple Wastestream Subcategory Centralized Waste Treatment Facility (CWT) for (Metals, Oils and Organics). The facility is permitted by the Miami-Dade County Permitting, Environment and Regulatory Affairs (PERM) and discharges to the Miami-Dade County Water and Sewer Department POTW. The Miami Facility also operates as a Used Oil Processing Facility recycling used oil into an on spec burner fuel for shipment to various asphalt and cement plants. The facility has a FDEP Used Oil Processing Facility Permit and has 26 registered storage tanks.

The CBI Port Everglades Facility is a Used Oil Transfer Facility with an FDEP used Oil Processing Facility permit and has eleven (11) registered storage tanks.

The CBI Fort Pierce Facility is registered with FDEP as a Used Oil Transfer Facility and has one (1) registered storage tank.

The CBI Tampa Facility is a Used Oil Transfer Facility with an FDEP Used Oil Processing Facility Permit and has five (10) registered storage tanks.

The CBI Jacksonville Facility is a Used Oil Transfer Facility with an FDEP Used Oil Processing Facility Permit and has nine (9) registered storage tanks.

4 – All oily water, used oil and used oil filters and PCW picked up by the CBI Canaveral Facility is ultimately transported to the CBI Miami Facility for recycling and petroleum recovery. Testing in Miami is conducted consistent with the Waste Analysis SOP for the CBI Miami Facility.

5 – Training for Used Oil Drivers includes FDEP Used Oil Handling and Transportation Requirements.

6 – All waste-streams, including soils, handled by CBI Facilities are profiled using lab analysis and generator knowledge to determine whether they are hazardous or non-hazardous and proper disposal methods.

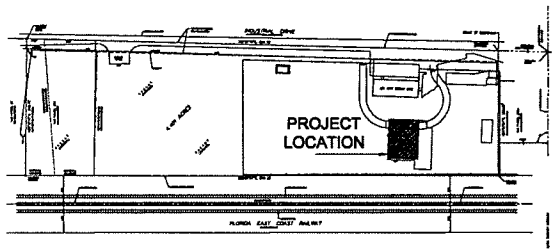
7 – Response to any spills will be per the P.E. Certified "SPCC Plan and Contingency Plan and Emergency Procedures." All sludges and solids removed from the storage tanks will be characterized, using laboratory analysis including TCLP and EPA methods 8240 and 8260, and disposed per EPA guidelines in 40 CFR Hazardous Waste Regulations.

Table #1
Horizontal Tanks

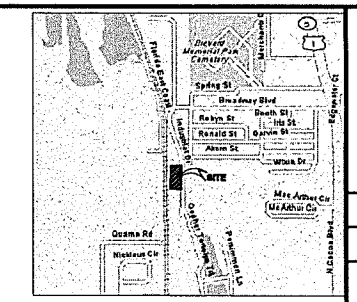
Tank #	Date Installed	Size (Gallons)	Material of Construction	Products
01	10/06	8,300	Steel	Used Oil/Water
02	10/06	8,300	Steel	Used Oil/Water
03	10/06	8,300	Steel	Used Oil/Water

Vertical Tanks

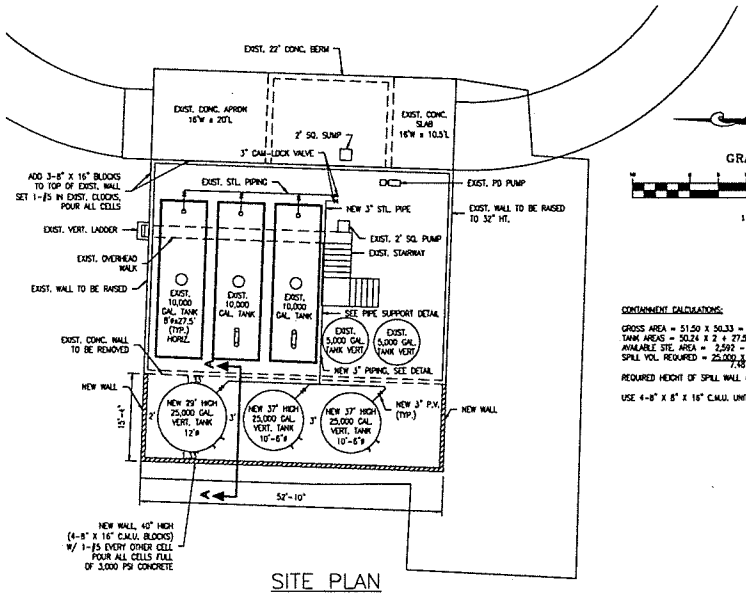
04	10/06	5,000	Steel	Used Oil
05	10/06	5,000	Steel	Used Oil
06	2020	25,000	Steel	Used Oil
07	2020	25,000	Steel	Used Oil
08	2020	25,000	Steel	Used Oil



AREA MAP
SCALE: 1"=100'



LOCATION MAP
SCALE: 1"=100'



SITE PLAN
SCALE: 1"=10'

GRAPHIC SCALE

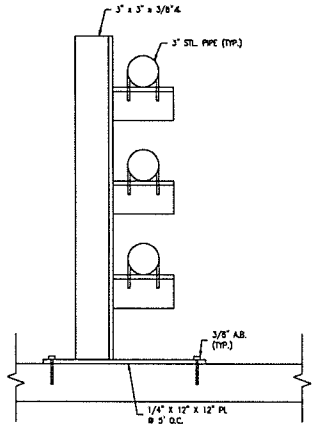
(IN FEET)
1 inch = 10 ft.

CONTAINMENT CALCULATIONS:

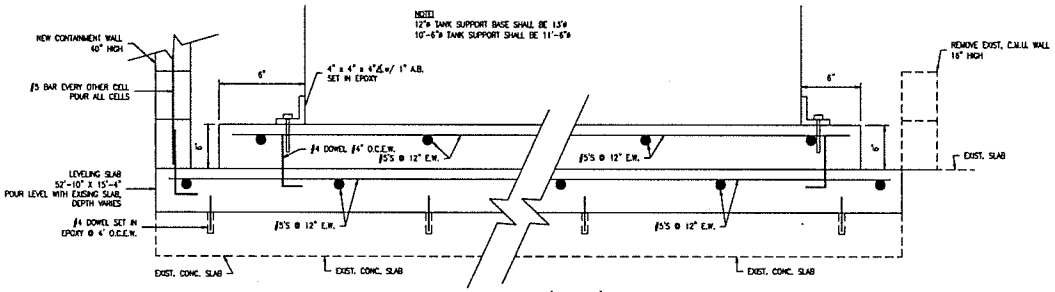
GROSS AREA = 51.50 X 50.33 = 2,592 SQ FT.
TANK AREAS = 50.24 X 3 + 27.5 X 3 + 113.10 + 85.58 X 2 + 35 = 1,081.76
AVAILABLE STE. AREA = 2,592 - 1,081.76 = 1,510.24 SQ. FT.
SPILL VOL. REQUIRED = $\frac{25,000 \times 1.10}{7.48}$ = 3,676.47

REQUIRED HEIGHT OF SPILL WALL = $\frac{3,676.47}{1,510.24}$ = 2.43' = 29.23"

USE 4-8" X 8" X 16" C.M.U. UNITS, 32" HIGH



PIPE SUPPORT DETAIL
SCALE: N.T.S.



SECTION 'A-A'
SCALE: N.T.S.

NO	DATE	BY	CKD	REVISIONS

CBI CANAVERAL FACILITY
6855 INDUSTRIAL DRIVE COCOA, FLORIDA

D.M. AMBROSE, CIVIL ENGINEER
CONSULTING ENGINEER
[illegible]

SCALE:	AS NOTED
DATE:	11/28/12
DRAWN BY:	RCW
CHECKED BY:	DMA
DESIGNED BY:	DMA

C1 OF 1

D.M. AMBROSE, P.E.
FLORIDA REGISTRATION NO. 12831

SEAL

DATE: Nov 30, 2012 - 10:01pm C:\Users\Rob\Desktop\Rob Work\DMA\CBI Canaveral\Working Set\CBI Canaveral ENG Plan.dwg

Attachment 2

4. *Attach a detailed description of the process flow should be included. The description should discuss the overall scope of the operation including analysis, treatment, storage and other processing, beginning with the arrival of an incoming shipment to the departure of an outgoing shipment. Include items such as size and location of tanks, containers, etc. A detailed site map, drawn to scale, should be attached to this description. (See item 4, page 4)*

Cliff Berry Incorporated (CBI) provides used oil transportation and disposal for a range of clients from independent gas stations to multinational oil companies. The process and procedures are identical for all clients. Upon request from the client the material is profiled, including notification to the client that we don not pick up materials with halogens above 1.000 parts per million (ppm). CBI uses separate trucks to pick-up Used Oil and PCW and CBI does not co-mingle Used Oil and PCW in the same truck. Upon arrival at the client site the driver samples the used oil for halogens. If halogens are found the material is refused and the company is notified. If the material passes the halogens test it is pumped into the truck and manifested to the Canaveral storage facility or to the CBI Miami Facility or an approved third party. If sent to the storage facility it is stored within the permit limits then manifested to the CBI Miami Facility or other approved facility for processing. Use of storage is often necessary to ensure quick turnaround for clients with multiple loads or it allows for the accumulation of smaller loads into a cost effective load to the CBI Miami Facility or other approved facility. No processing occurs at the Canaveral storage facility except for gravity separation that occurs naturally as the material waits to be transported to the CBI Miami Facility or other approved facility. No additives, nor heating, are used to aid in gravity separation.

Attachment 2:
The following process description is consistent with the CBI Waste Analysis Plan which answers the questions as to "analysis, treatment, storage or other processing, beginning with the arrival of an incoming shipment to the departure of an outgoing shipment."

The Canaveral Facility does not have a lab and all testing is performed with field instruments. The pick-up of waste streams is coordinated in advance and those waste streams for which generator knowledge or process knowledge is used to profile the waste, a phone call is initiated with the generator to discuss the origin and process from which the waste is generated so that a proper profile can be developed.

Used Oil

A representative sample of the used oil will be collected and tested for halogens at each client location prior to pick-up using a sniffer (initially) or a Q1000 test kit (if warranted by a high reading on the sniffer). If the test results are <1000 ppm for halogens the load is allowed to be managed by CBI. Only used oil will be loaded into Used Oil designated tanks and kept separated from PCW tanks. As noted above all loads of used oil are eventually transported to the CBI Miami Facility and upon arrival a representative sample is brought to the lab for the following tests to be performed prior to offloading of

the waste or by product. The Miami Facility lab will perform several tests including water by distillation, treatability, halogens, flash point, solids content and PCB scan when applicable. After all testing has been performed to ensure that it meets the approved profile the used oil load will then be offloaded in Miami. Approval will be given to the Miami Facility offload technician, offload manager and/or oil processing manager to accept the load into the facility. All loads not meeting the approved profile's criteria must be reported to the Facility Manager immediately. The Facility Manager will contact either the sales manager or the generator directly to discuss the problem with acceptance of the waste stream. If it is confirmed that the facility cannot treat and process the waste stream, the load will be rejected.

Petroleum Contact Water (PCW)

Only PCW will be loaded into PCW designated tanks and kept separated from Used Oil tanks. As noted above loads of PCW may be transported to the CBI Miami Facility or an approved third party disposal facility. If placed into storage at the Canaveral facility the technician will test for pH to ensure the material is non-hazardous for pH. If taken to the Miami Facility, upon arrival a representative sample is brought to the Miami Facility lab for the following tests to be performed prior to offloading of the waste or by product. The lab may perform several tests including, pH, water by distillation, treatability, halogens, flash point, solids content and PCB scan when applicable. After all testing has been performed to ensure that it meets the approved profile the PCW load will then be offloaded. Approval will be given to the offload technician, offload manager and/or oil processing manager to accept the load into the facility. All loads not meeting the approved profile's criteria must be reported to the Facility Manager immediately. The Facility Manager will contact either the sales manager or the generator directly to discuss the problem with acceptance of the waste stream. If it is confirmed that the facility cannot treat and process the waste stream, the load will be rejected.

Grit Trap/Sump Waste

The Canaveral Facility uses a grit trap as a crude filter to drop out sand and other solids prior to pumping Used Oil into a permitted storage tank. The volume of material build-up is minimal and may only be cleaned a couple of times a year. The sludge is typically placed into 55 gallon steel drums for disposal. Prior to disposal a representative sample of the grit trap/sump waste will be collected and brought to a third party lab for analysis for TCLP and EPA test methods 8240 and 8260. Based upon the results of testing arrangements will be made for appropriate disposal.

Attachment 3

5. *The following parts of facility's operating plan should be included as attachments to the permit application.*

a. An analysis plan which must include:

i. a sampling plan, including methods and frequency of sampling and analysis:

Sampled material	Sampling method	Frequency
Used Oil	Halogen (sniffer or Q1000 test kits to check for <1000 ppm halogens)	At each pick-up or upon arrival at the facility
PCW	Generator knowledge from source that meets definition of PCW. Test for pH.	For each pick-up
Oily Water	Generator knowledge/ process knowledge	For each pick-up

II. *a description of the fingerprint analysis on incoming shipments, as appropriate:*

Halogen and pH testing, as appropriate, are performed at the Canaveral facility using field instruments.

iii. *an analysis plan for each outgoing shipment (on batch/lot can equal shipment, provided the lots are discreet units) to include metals and halogens:*

The Canaveral Facility does not perform additional testing on outgoing shipments except for grit trap waste. Additional analysis may be performed for loads transported to the Miami Facility as described earlier or a sample may be sent out to a third party laboratory to establish a profile for an approved third party disposal facility. The Canaveral Facility will perform tests on sludges, residues and byproducts upon cleaning of grit traps as noted earlier (see question 4 responses). The Canaveral Facility does not have a lab and all testing is performed with field instruments.

Canaveral Waste Analysis Plan

Background:

CBI Canaveral Facility is a small satellite branch of Cliff Berry Incorporated, sited in the Canaveral, Florida area. The branch receives used oil, oily water and petroleum contact water for storage and transport to the CBI Miami Facility.

Purpose:

The purpose of this plan is to identify various waste streams that may be accepted into the CBI Canaveral Facility and then later into the CBI Miami Facility.

Discussion:

The Waste Analysis Plan will ensure compliance of the facility by detailing the minimum testing requirements for all wastes received into the facility and covers the following waste streams:

- Used Oil,
- Petroleum Contact Water (PCW),
- Oily Water, and
- Grit Trap/Sump Waste.

Methods and Equipment:

The Canaveral Facility does not have a lab and all testing is performed with field instruments. The pick-up of waste streams is coordinated in advance and those waste streams for which generator knowledge or process knowledge is used to profile the waste, a phone call is initiated with the generator to discuss the origin and process from which the waste is generated so that a proper profile can be developed.

<u>Used Oil</u>

A representative sample of the used oil will be collected and tested for halogens at each client location prior to pick-up using a sniffer (initially) or a Q1000 test kit (if warranted by a high reading on the sniffer). If the test results are <1000 ppm for halogens the load is allowed to be managed by CBI. Only used oil will be loaded into Used Oil designated tanks and kept separated from PCW tanks. As noted above all loads of used oil are eventually transported to the CBI Miami Facility and upon arrival a representative sample is brought to the lab for the following tests to be performed prior to offloading of the waste or by product. The Miami Facility lab will perform several tests including water by distillation, treatability, halogens, flash point, solids content and PCB scan when applicable. After all testing has been performed to ensure that it meets the approved profile the used oil load will then be offloaded in Miami. Approval will be given to the Miami Facility offload technician, offload manager and/or oil processing manager to accept the load into the facility. All loads not meeting the approved profile's criteria must be reported to the Facility Manager immediately. The Facility Manager will contact either the sales manager or the generator directly to discuss the problem with acceptance of the waste stream. If it is confirmed that the facility cannot treat and process the waste stream, the load will be rejected.

Petroleum Contact Water (PCW)

Only PCW will be loaded into PCW designated tanks and kept separated from Used Oil tanks. As noted above loads of PCW may be transported to the CBI Miami Facility or an approved third party disposal facility. If placed into storage at the Canaveral facility the technician will test for pH to ensure the material is non-hazardous for pH. If taken to the Miami Facility, upon arrival a representative sample is brought to the Miami Facility lab for the following tests to be performed prior to offloading of the waste or by product. The lab may perform several tests including, pH, water by distillation, treatability, halogens, flash point, solids content and PCB scan when applicable. After all testing has been performed to ensure that it meets the approved profile the PCW load will then be offloaded. Approval will be given to the offload technician, offload manager and/or oil processing manager to accept the load into the facility. All loads not meeting the approved profile's criteria must be reported to the Facility Manager immediately. The Facility Manager will contact either the sales manager or the generator directly to discuss the problem with acceptance of the waste stream. If it is confirmed that the facility cannot treat and process the waste stream, the load will be rejected.

Grit Trap/Sump Waste

The Canaveral Facility uses a grit trap as a crude filter to drop out sand and other solids prior to pumping Used Oil into a permitted storage tank. The volume of material build-up is minimal and may only be cleaned once or twice a year. The sludge is typically placed into 55 gallon steel drums for disposal. Prior to disposal a representative sample of the grit trap/sump will be collected and brought to a third party lab for analysis for TCLP and EPA test methods 8240 and 8260. Based upon the results of testing arrangements will be made for appropriate disposal.

Attachment 4

5. b. *A description of the management of sludges, residues and byproducts. This must include the characterization analysis as well as the frequency of sludge removal.*

Attachment 4

Sludges, residues and byproducts are managed using the same processes as detailed in Attachment 3 – Waste Analysis Plan. The Canaveral Facility will perform TCLP and EPA methods 8240 and 8260 analysis on grit trap waste/sludge when generated. The Canaveral Facility generates approximately 165 gallons of grit trap waste/sludge per year. The trap is typically cleaned three times per year.

Attachment 5

5. c. *A tracking plan which must include the name, address and EPA identification number of the transporter, origin, destination, quantities and dates of all incoming and outgoing shipments of used oil.*

Attachment 5

CBI facilities use manifests in tracking transportation of materials. The information from each manifest is transferred to our electronic database (Desert Micro ®) and the following information can be tracked: manifest number, name, address, EPA identification number of the transporter, origin, quantities and dates of all incoming shipments, plus the destination of all outgoing shipments of used oil.

The type and quantity of Used Oil and Petroleum Contact Water (PCW) is tracked in a log book annotating the number of the tank into which it was loaded and later removed. The tank farm is inspected weekly and certified by stamp and signature.

Used Oil and Petroleum Contact Water (PCW) are stored in separate tanks.

Attachment 6

6. *Attach a copy of the facility's preparedness and prevention plan. This requirement may be satisfied by modifying or expounding upon an existing SPCC plan. Describe how the facility is maintained and operated to minimize the possibility of a fire, explosion of any unplanned releases of used oil to air, soil, surface water or groundwater which could threaten human health of the environment.*

Facility preparedness and prevention planning:

Please refer to the Canaveral Facility SPCCP and Contingency Plan which contains the information sought by this item.

– Attachment 7

7. *Attach a copy of the facility's Contingency Plan. This requirement should describe emergency management personnel and procedures and may be met by using a modifying or expounding on an existing SPCC plan or should contain the items listed in the Specific Instructions.*

Contingency Plan:

Please refer to the Canaveral Facility SPCCP and Contingency Plan which contains the information sought by this item.

Attachment 8

8. *Attach a description of the facility's unit management for tanks and containers holding used oil. This attachment must describe secondary containment specifications, inspection and monitoring schedules and corrective actions. This attachment must also provide evidence that all used oil process and storage tanks meet the requirements described in item 8b on page 6 of the specific instructions, and should be certified by a professional engineer, as applicable.*

Tank Management and Secondary Containment Certification:

Please refer to the Canaveral Facility SPCCP and Contingency Plan which contains the information sought by this item.

ATTACHMENT NO. 9

Attachment 9

Cliff Berry Inc.
Canaveral Facility Closure Plan
Revised: July, 2017

Introduction:

Cliff Berry, Inc. (CBI) is operating a used oil transfer facility in the Canaveral area that receives used oil, oily water and petroleum contact water (PCW) which are generated by retail gasoline stations, oil companies, automobile dealerships, airports and marine interests. All products are delivered to the CBI plant by over the road transport vehicles. The facility has the capacity of storing approximately 109,900 gallons of used oil, oily waste or PCW.

The facility operates under licenses issued by Brevard County, and the State of Florida Department of Environmental Protection (FDEP). Company owned transport vehicles are licensed by Broward County Environmental Protection Department (EPD), and Miami-Dade County Department of Permitting, Environment and Resource Management (PERM). All oily liquids and sludges will be transferred and stored within containment areas which have been designed to meet rules and regulations current at the time of installation. All oily liquids delivered to the facility will be handled under manifests issued by the generators.

General Provisions:

As required by the Florida Administrative Code (FAC) Rule 63-710.800 (9), CBI has adopted this document to be used as required, during the closure of the facility.

At closure, CBI will institute the following steps:

1. Remove all standing liquids, waste and waste residues from the facility. All stored liquids will be tested, if POTW standards are met, discharge will be made to the sewer system. All liquids which do not meet POTW standards will be sent off-site for proper disposal.
2. Current plans require that the closure event will result in the complete cessation of all operations at the CBI transfer facility. Management does not contemplate partial operation of the facility. There will be no need for further facility maintenance.
3. If monitoring wells have been installed prior to closing, all on site monitoring wells will be sampled in accordance with an approved Quality Assurance Plan and analyzed for US EPA approved mixed product analytical group parameters – Volatile Halocarbons (601), volatile aromatics in water (602), 1,2 dibromomethane (EDB), Methly ter-buty ether (MTBE), all eight RCRA Metals.
4. A split spoon coring device will be used for the extraction of composite soil samples (taken from the surface to groundwater). Soil samples will be taken from areas immediately adjacent to where trucks are stored and will include sample points on all sides of the facilities property, and at least at two depths (non-composite). Visual inspection of soils adjacent to the containment area will determine the location of soil sampling. An OVA/FID instrument will be used for the detection of organic contamination at levels greater than 50 parts per million. The samples

identified as being the most contaminated will be submitted to an approved laboratory for analysis and identification of individual constituents. Should contamination be found, CBI will submit a Contamination Assessment Plan (CAP). After approval and implementation of the CAP a Contamination Assessment Report (CAR) and Remedial Action Plan (RAP) will be developed.

5. All tanks, piping, secondary containment and ancillary equipment will be emptied, cleaned and decontaminated. Filter sand, sludge and treatment process residues will be tested for hazardous characteristics; disposal of these items will be consistent with the results of the analysis. Contaminated surfaces will be high pressure washed with appropriate detergents. The effectiveness of all decontamination steps will be assessed by using swab samples of the formerly contaminated surfaces. Decontamination will be confirmed through the analysis of final rinsate liquids.

All assessment and remedial work will be done in accordance with the Florida Administrative Code (FAC) Rules 62-762, 62-710.510 and 62-780.

Should material or containerized soils be encountered during the closure, steps will be taken to control mitigation of hazardous waste and hazardous waste constituents from the affected area into ground or surface water.

These steps will include:

1. Contaminated materials will be containerized and sealed prior to their proper disposal to prevent runoff due to rainfall.
2. Isolation of contaminated areas and materials from contact with personnel. Closed covered containers will be utilized for soils.
3. Separation of decontaminated material from non-contaminated materials.
4. Containment of all wash water and decontamination materials. Such will be handled as appropriate, either as a hazardous waste through a manifest or will be discharged to the PORW. Approval from the POTW will be obtained prior to release.

During execution of the above steps, the following factors will provide the basis of action:

1. Should disposal of closure generated materials require land treatment, the type an amount of hazardous waste and hazardous waste constituents along with the mobility and expected rate of migration of the material will be evaluated prior to implementing a remedial plan.
2. Factors such as location, topography, surround land use, climate (frequency) and pH of precipitation and biological characteristics of potential disposal sites will be performed.
3. Site specific studies involving unsaturated zone monitoring, type, concentration and depth of migration of hazardous waste constituents in the soil as compared to their background concentrations will be performed, if indicated.

Prior to initiating site closure, the following will be done:

1. Contaminated soil and liquids will be manifested off site to a permitted TSD facility.

2. Tanks, piping and machinery will either be removed or decontaminated.
3. Placement of final cover considering the following:
    a. Functions of the cover.
    b. Characteristics of the cover including material, final surface contours, thickness, porosity/permeability, slope, length of run of slope and type of area vegetation.
    c. Monitoring of groundwater.

Final Closure:

Sixty (60) days prior to the scheduled date of closing of the Canaveral Facility, CBI will submit an updated and detailed closure plan to the FDEP.

A revised final plan will be submitted and CBI shall provide a written notice seven (7) days prior to initiating closure. This plan will be issued during a closure event and will identify the steps necessary to perform final closure of the facility. The amended closure plan will include:

1. A description of how each waste management unit at the facility will be closed.
2. A description of how final closure of the facility will be conducted. The description will identify the maximum extent of operations conducted during the active life of the facility.
3. A projection of the maximum inventory of waste stored on site over the active life of the facility; and a detailed description of the methods to be used during final closure including but not limited to procedures for cleaning equipment and removing contaminated soils, methods for sampling and testing surrounding soils, and criteria for determining the extent of contamination necessary to satisfy the closure performing standards.
4. A detailed description of the steps necessary to remove or decontaminate all waste residues of concern and contaminated material system components, equipment, structures, and soil during final closure including but not limited to procedures for cleaning equipment and removing contaminated soils, methods for sampling and testing surrounding soils, and criteria for determining the extent of contamination necessary to satisfy the closure performing standards.
5. A detailed description of other activities necessary during the final closure period to insure that all closure activities satisfy the closure performance standards including but not limited to groundwater monitoring, leachate collection, and run-on and run-off control.
6. A schedule for closure of each waste management unit and for final closure of the facility. The schedule will include the total time required to close each waste management unit and the time required for final closure.

Within thirty (30) days of final closure of the Canaveral Facility, CBI will submit a certification of closure completion to the FDEP demonstrating that the facility was closed in substantial compliance with the detailed Closure Plan.

ATTACHMENT NO. 10

USED OIL
DRIVER TRAINING
2012

ATTACHMENT 11
SPCC Plan

CBI

Spill Prevention Control & Countermeasure Plan

And

Contingency Plan and Emergency Response

Canaveral Facility

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CLIFF BERRY, INC. (CBI)

SPILL PREVENTION CONTROL & COUNTERMEASURE PLAN (SPCC)

AND

CONTINGENCY PLAN AND EMERGENCY PROCEDURES

CANAVERAL FACILITY

5855 Industrial Drive, Cocoa, Florida 32927

EPA ID Number: FLR000119792

Location: Latitude 28 – 27 – 24.8 North Longitude: 80 – 46 – 17.8 West

Telephone Numbers:	**Canaveral Facility**	**(321) 639-4199**
	24 Hour Emergency Response	**(800) 899-7745**
	Fort Lauderdale (Main Office)	**(954) 763-3390**
Mailing Address:	**PO Box 13079, Fort Lauderdale, FL 33316**	
Responsible Person:	**Cliff Berry II**	**CEO and Qualified Individual (QI)**
	Paul Meding	**Facility Manager (cell) (772) 519-6015**

Plan No. _____

CLIFF BERRY, INC. CAPE CANAVERAL
SPCC AND CONTINGENCY PLAN
DISTRIBUTION LIST

PLAN NO.	ENTITY
1	Florida Department of Environmental Protection
2	Brevard County Department of Environmental Remediation and Compliance
3	Brevard County Police Department
4	Brevard County Fire Department
5	Wuesthoff Medical Center
6	Canaveral Facility Copy
7	Cliff Berry II (CBI)
8	Steve Collins (CBI)

TABLE OF CONTENTS

Spill Prevention Control & Countermeasure Plan

TABLE OF CONTENTS
(Continued)

Contingency Plan and Emergency Procedures

TABLE OF CONTENTS
(Continued)

Contingency Plan and Emergency Procedures

16. Biomedical Waste Operating Plan

- Training for Personnel
- Definition, identification and segregation of biomedical waste
- Containment
- Labeling
- Storage
- Transport
- Procedure for decontamination biomedical waste spills
- Contingency plan
- Branch and Corporate Offices
- Miscellaneous

Record of Changes

Change No.	Date of Change	Section	Description of policy	Initials

Note: Make all changes upon receipt.

CERTIFICATION OF SPCC PLAN

CERTIFICATION

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

DAVID M. AMBROSE, 2/12/2017, DMAmbrose

Name, Date, Signature & Seal of Professional Engineer

Approval

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

Cliff Berry, II	**CEO**
Name of Responsible Officer	**Title of Responsible Officer**

Signature of Responsible Officer

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CLIFF BERRY, INC. – CANAVERAL FACILITY

SPILL PREVENTION CONTROL AND COUNTERMEASURES PLAN (SPCC)

AND

CONTINGENCY PLAN AND EMERGENCY PROCEDURES

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

1. The five (5) shop erected above ground storage tanks (AST) are located within concrete secondary containment. The above referenced tanks are visually inspected daily by facility personnel for integrity and leakage during normal facility operations. The above reference ASTs were inspected and certified by a professional engineer at the time of their installation in 2006. The next inspection and certification by CBI's professional engineer will be performed in 2026.

2. Three (3) additional AST's are planned for the future as noted in the Tank Table in Section 3.

3. All facility valves and piping are above ground and located within concrete secondary containment. The above referenced valves and piping are visually inspected daily by facility personnel for integrity and leakage during normal facility operations.

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INTRODUCTION

The Canaveral Facility is owned by C-2 Holdings and operated by Cliff Berry, Incorporated (CBI). It is located at: 28° 27' 24.8" North Latitude and 80° 46' 17.8" West Longitude. The facility has a local address of 5855 Industrial Drive, Cocoa, Florida 32927.

The person in charge of the facility is the Facility Manager noted in Section 9 however, Natalie Hood is the Primary Emergency Contact who resides in the area and can be reached twenty-four (24) hours a day at 1-800-899-7745. The facility may be opened twenty-four (24) hours a day seven (7) days a week as needed.

The Canaveral Facility has incorporated secondary containment in all areas where during normal operations there is a reasonable potential for an oily wastewater spill.

Details of tank size and contents are shown in Table 1 in Section 3.

During normal operations, all products are received from trucks.

Spill Events:

This facility was originally constructed in 2002 and previous spill events are as follows:

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

Prediction of Spill Behavior:

(a) A spill from any of the bulk storage tanks would be contained in the diked area.

(b) Any spill from drums stored on the concrete containment area, would be contained in the diked area and pumped out for reclamation and/or disposal at an approved site.

Bulk Storage Tanks:

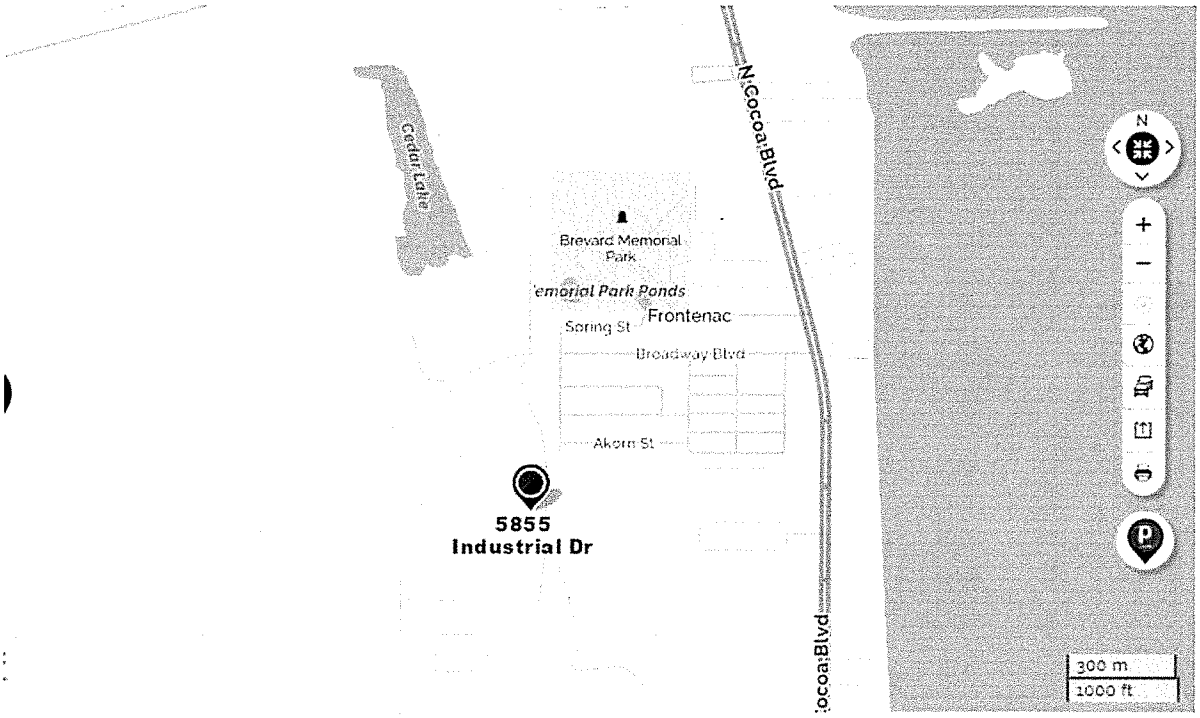
The materials and design of the bulk storage tanks are compatible with the product they hold. A tank integrity inspection will be made of each tank daily and records will be kept of the results of inspections in logbooks. All above ground tanks, their foundations and supports will be visually inspected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

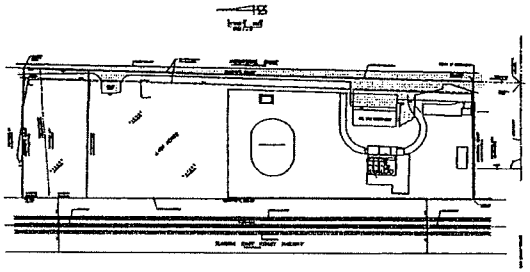
Inspection Records:

Inspection, their frequency and records are maintained as follows:

Inspection/Test	Frequency	Record
Tank integrity (visual)	Daily	Yes
Tank supports & foundations (visual)	Daily	Yes
Liquid sensing device's	Daily	Yes
Above ground valves, pipe & fittings (visual)	Daily	Yes
Corrective Actions	As required	Yes

Cliff Berry, Inc.
5855 Industrial Drive
Cocoa, FL 32927-4608





LOCATION MAP
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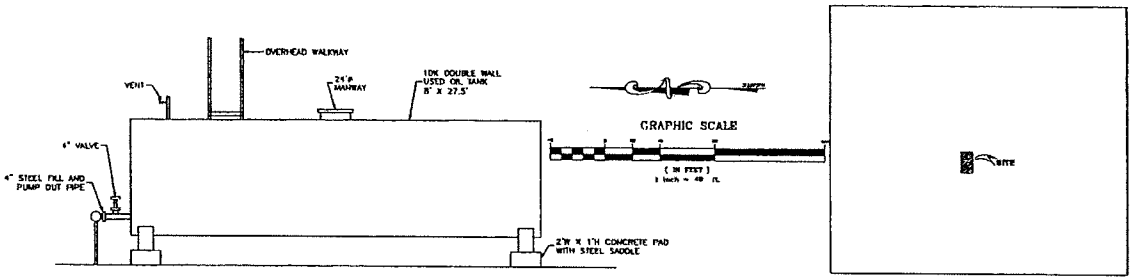
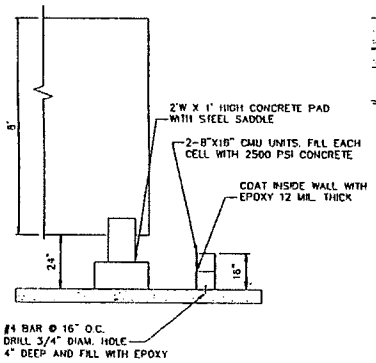
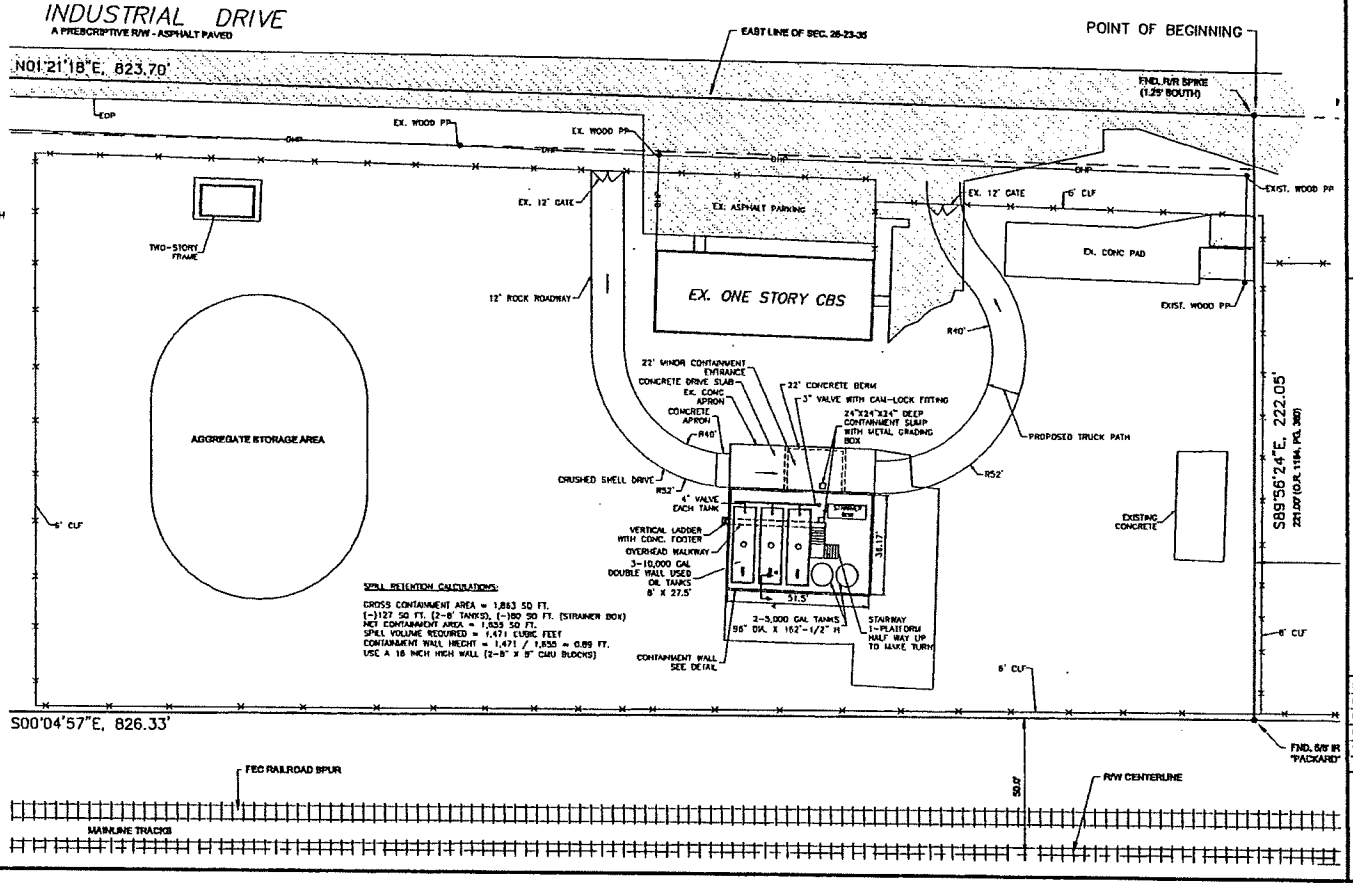


TYPICAL TANK ELEVATION



SECTION A–A
1"=2'



CBI CANAVERAL FACILITY
5855 INDUSTRIAL DRIVE
COCOA, FLORIDA

AS-BUILT ENGINEERING PLAN
FOR USED OIL STORAGE

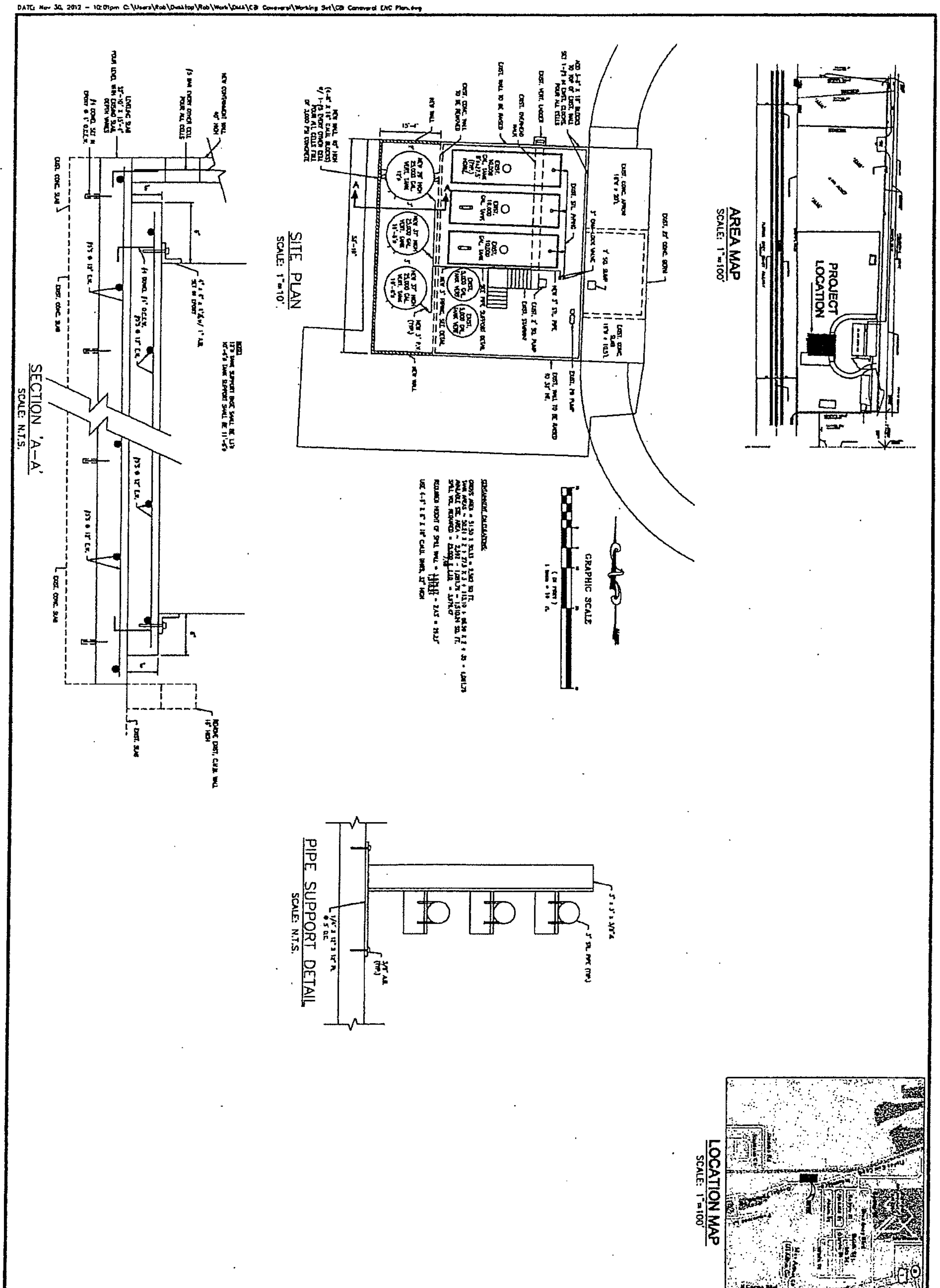
CARNAHAN · PROCTOR · CROSS, INC.
CONSULTING ENGINEERS · SURVEYORS · PLANNERS

SCALE:	1"=20'
DATE:	8/23/05
DRAWN BY:	RCW
CHECKED BY:	DMA
DESIGNED BY:	DMA

C1 OF 1

D.M. AMBROSE, P.E.
FLORIDA REGISTRATION
NO. 12501

SEAL



SEAL	SCALE: AS NOTED DATE: DRAWN BY: RCM CHECKED BY: DMA DESIGNED BY: DMA C1 OF 1	**D.M. AMBROSE, CIVIL ENGINEER** CONSULTING ENGINEER
		CBI CANAVERAL FACILITY 5855 INDUSTRIAL DRIVE COCOA, FLORIDA X

NO	DATE	BY	CKD	REVISIONS

Cliff Berry Incorporated

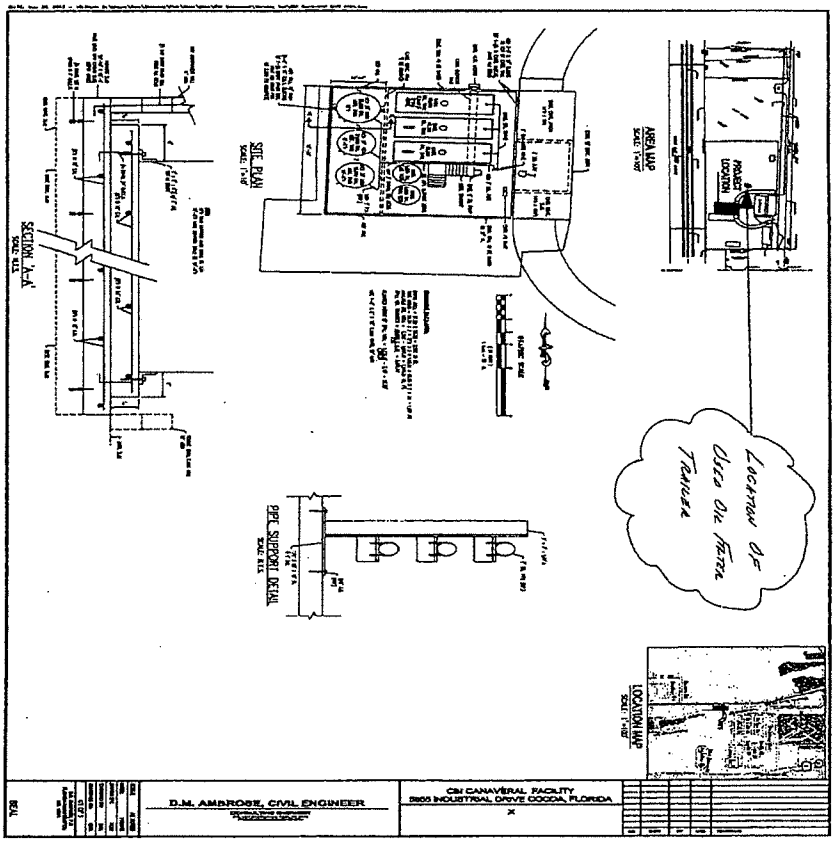
1.2

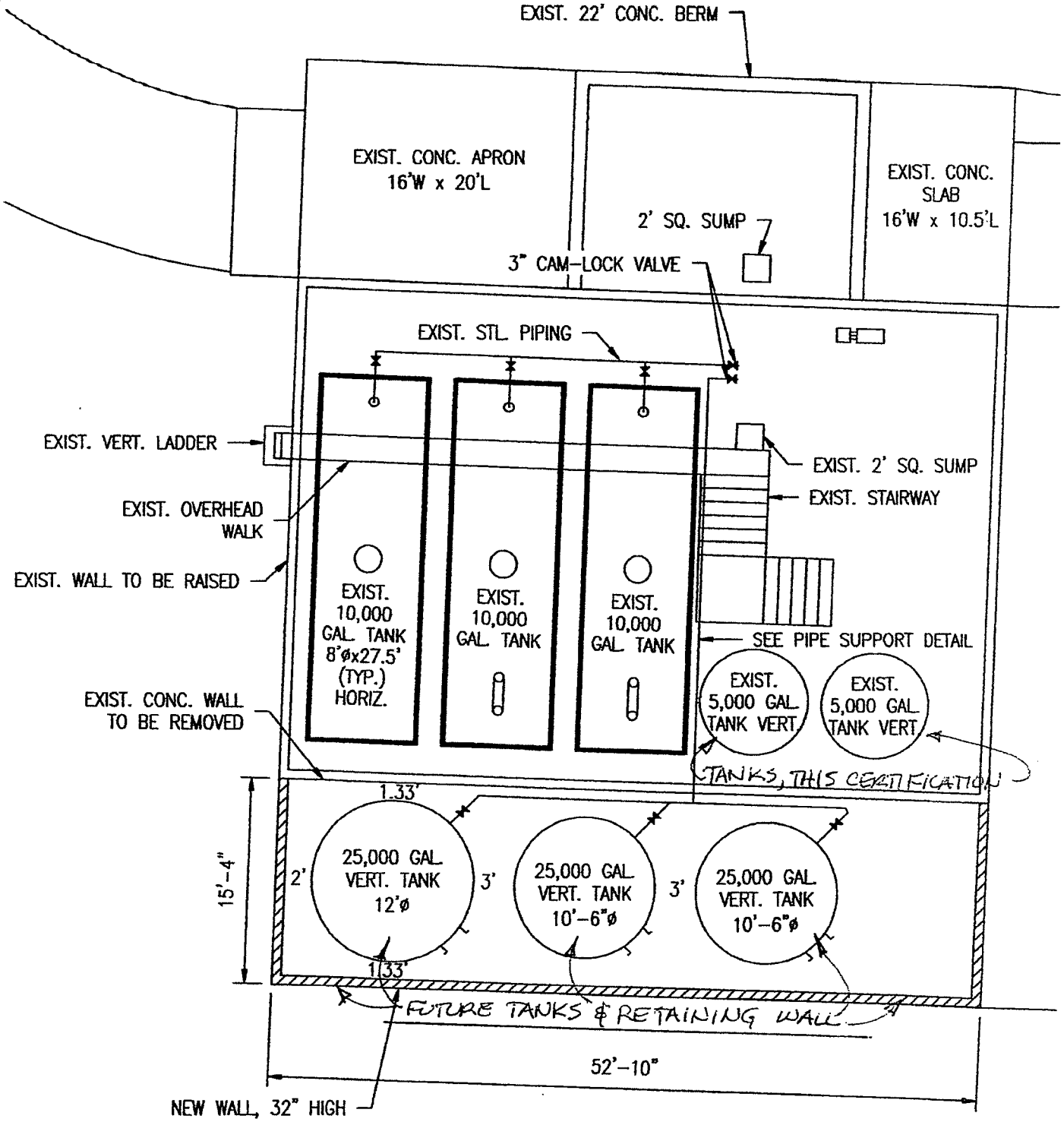
Section 2

Cliff Berry, Inc.- Canaveral Facility
5855 Industrial Drive
Cocoa, FL 32927

I. D. Number : FLR 000 119 792
Permit No : 249477-HO-002
Expiration Date : February 5, 2018

Site Map





D.M. AMBROSE, P.E. FLORIDA REGISTRATION NO. 12891 SEAL	SCALE: N.T.S. DATE: 2/1/15 DRAWN BY: RCW CHECKED BY: DMA DESIGNED BY: DMA	**D.M. AMBROSE, CIVIL ENGINEER** CONSULTING ENGINEER	**CBI CANAVERAL FACILITY** **SITE PLAN SKETCH**

DATE: Feb 13, 2015 - 10:23pm C:\Users\Rob\Documents\projects\Rob\Work\CBI\ACAD\CBI Canaveral\Working Set\CBI-CO-DWG.dwg

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ON SHORE STORAGE TANK FARM AND TRUCK LOADING FACILITY

On Shore Storage Tank Farm & Truck Loading Facility

Cliff Berry, Inc.'s waste oil storage tank farm and truck loading facility is located at 5855 Industrial Drive, Cocoa, Florida 32928. Cliff Berry, Inc.'s mailing address is PO Box 13079, Fort Lauderdale, Florida 33316.

All storage tanks have been individually inspected and repaired where applicable and evaluated for their suitability to store the oily waste water collected from a materials and construction point of view. In addition, containment for the tank facilities are designed to contain the contents for the largest tank plus ten percent (10%). There are no known below ground storage tanks at the Canaveral Facility.

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

Cliff Berry, Inc.'s oily used oil vertical tank facility is contained by a concrete wall approximately sixteen inches (16") high by eight (8) inches in thickness; secondary containment is provided by 5 inches thick impervious concrete slab located within the concrete containment wall. Three storage tanks used for used oil storage and oily water storage are anchored to the concrete pad within the retaining wall.

Note: the three (3) storage tanks are double walled tanks and therefore do not need secondary containment.

Curbing:

A concrete slab is also located outside the tank farm, in the truck unloading area. The slab has a slight curb to it in order to prevent run off of spilled material (minimal spills.)

Culverting, Gutters or Other Drainage Systems; Sumps:

The tank farm has one sump within the sloped concrete pad at the truck unloading area. Should a spill occur this sump would be used to catch spilled materials..

Spill Diversion Ponds:

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

Retention Ponds:

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

Sorbent Materials:

Note: see equipment and sorbent list.

Spill and Rainwater Disposal:

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

Similarly rain water will be drained out of the containment area. If the rain water is contaminated it will be pumped out and disposed with our other wastewater.

Visual Inspection:

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

Fail Safe Operation:

Consideration has been given to "Fail Safe" operation where applicable. The receiving tanks (atmospheric storage) are equipped with high-level sensors that are engineered to sound an alarm prior to inadvertently over filling during discharges from tanker trucks. During transfer operations personnel will physically monitor levels in applicable tanks and be equipped with radios to communicate level status to plant operators. Level sensors and communication equipment will be tested periodically and repaired as required. Spare parts in sufficient quantity will be maintained as recommended by the manufacturers.

Safe Vehicle Operation:

Operators of vehicles entering the facility will have been trained in safe vehicle operation and have experience at other similar operating tank farms facilities. Warning signs will be posted where appropriate. There is minimum probability of damage to above ground piping. Operators will be trained in loading/unloading procedures to preclude spills and containment has been provided in this area.

Security Response

The facility is fully fenced and gates are locked. During off hours, Operations personnel are maintained in an On-Call status in the event they are needed to respond to any condition requiring their response.

3L Storage Tanks and Piping Inspections

All storage tanks, piping, joints, valve glands and bodies, pipeline supports, metal surfaces and other above ground equipment and facilities for holding oil and water will be visually checked by each employee as they pursue their daily work. Any and all discrepancies will be reported immediately to the supervisor. Additionally, an entry will be made n the record of any discrepancy and the corrective action taken.

A DETAILED AND SPECIFIC VISUAL CHECK OF THE ENTIRE FACILITY WILL BE MADE ON THE FIRST WORKING DAY OF EACH MONTH. RECORDS OF THESE INSPECTIONS WILL BE MAINTAINED ON-SITE.

Table #1
Horizontal Tanks

Tank #	Date Installed	Size (Gallons)	Material of Construction	Products
01	10/06	10,000	Steel	Used Oil/Water
02	10/06	10,000	Steel	Used Oil/Water
03	10/06	10,000	Steel	Used Oil/Water

Vertical Tanks

04	10/06	5,000	Steel	Used Oil
05	10/06	5,000	Steel	PCW
06	TBD	25000	Steel	Used Oil
07	TBD	25000	Steel	Used Oil
08	TBD	25000	Steel	Used Oil

SECURITY AT FACILITY

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

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

Facility lighting is maintained and changes have been made where applicable to enhance visibility during hours of darkness enabling greater awareness of operations and the added prevention of acts of vandalism.

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SPILL RESPONSE

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

Emergency Spill Response Procedure

Immediate steps for drivers and facility technicians:

- Stay with the vehicle until help arrives
- Use emergency numbers in spill plan to contact line management
- Keep the public away
- Dike off or boom liquids from entering sewers, storm sewers or water ways, follow emergency plans for further containment

Emergency Response Plan

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

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

Spill Containment Procedures:

Spills on pavement:

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

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

Spills on soil:

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

Remove Oil Soaked Sorbent Material:

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

SECURITY ON SPILLS

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

Checklist

- Contact a security company to provide guards where equipment is being stored and maintained. Make sure these guards can communicate with the Command Center at all times.
- Contact a fence company to provide fenced security areas for equipment.
- Local police departments can help in providing security, with off duty officers.
- Establish equipment and clothing distribution areas so personnel and equipment can be checked in and out.
- To ensure secure operations provide toilets and waste disposal facilities in decontamination and food serving areas.
- Establish First Aid kits or First Aid facilities throughout the clean-up area. Consider hiring off duty nurses to attend to general first aid treatment cases. They would also be qualified to determine when and if a person requires additional or more intense medical treatment.
- Provide lighting for security, decontamination, and equipment storage areas. Make sure that clean-up contactors and other involved personnel are provided adequate lighting at night.
- Issue temporary identification badges to all personnel involved in the clean-up operation. Insure custody control procedures are established for I.D. badges, so they will not fall into the wrong hands.
- As soon as possible, establish a claims office to handle the daily complaints for shoreline damage, boat damages, and many other claims which are made during the spill. This claims office should be near the spill site, but NOT near the Command Center.
- Establish a "Right Away" person who can make arrangements to access private property to support the clean-up.
- Establish sign out and return procedures for tools and consumables.
- Assign a key person to monitor all contractor activities regarding people, equipment in use, and hourly accounting.
- Assign security personnel to report safety infractions in the work place directly to the OSC at the Command Center.

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

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MATERIALS

SPC OIL SORBENT			
NAME	**SIZE**	**PACKING**	**QUANTITY**
SPC 100 Pads	17" x 19" x 3/8"	100 Pads/Bale	40
SPC 200 Pads	17" x 19" x 3/16"	200 Pads/Bale	120
SPC 50 Pads	34" x 38" x 3/8"	50 Pads/Bale	40
SPC 810 Boom	10' x 8"	4 Booms/Bale	70
SPC 510 Boom	10' x 5'	4 Booms/Bale	50
SPC 5110 Boom	10' x 5' (DBL Boom)	4 Booms/Bale	5
SPC 10 Pillow	14" x 25"	10 Pillows/Bale	15
SPC 1900 Sweep	17" x 100'	1 Sweep/Bale	80
SPC 150 Blanket	38" x 144' x 3/8"	1 Blanket/Bale	20
SPC 152 Blanket	19" x 144' x 3/8"	2 Blankets/Bale	10
SPC 27 Particulate		1 Bag/Bale	5

SORBENT INDUSTRIAL RUG & SUPER SIR			
NAME	**SIZE**	**PACKING**	**QUANTITY**
Sir 36 Rug	36" x 300'	1 Rug/Bale	10
Sir 18 Rug	18" x 300'	2 Rugs/Bale	15
Sir 001 Pads	18" x 18"	100 Pads/Bale	10

COBRA COIL			
NAME	**SIZE**	**PACKING**	**QUANTITY**
CC 400 Coils	3" x 48" Long	12 Coils/Box	15

SPC UNIVERSAL PLUS			
NAME	**SIZE**	**PACKING**	**QUANTITY**
UN 915 Pillow	9" x 15"	16 Pillows/Bag	10
Oil Snare		1 Snare/Box	25
Plastic Sheeting	20' x 100'	1 Roll/Box	5
Plastic Bags		Bags	2000
Steel overpack drums	65 gallon	Drum	10
Poly overpack drums	65 gallons	Drum	5
Open head steel drum	55 gallon	DOT approved Drum	50

SPC UNIVERSAL PLUS (continued)			
NAME	**SIZE**	**NUMBER**	**QUANTITY**
Coveralls, Tyvek	Assorted		100
Coverall, Saranyx	Assorted		50
Respirator cartridges	Assorted	Pair	100
Rubber boots (heavy duty)	Assorted	Pair	50
Rubber gloves (heavy duty)	Assorted	Pair	200
Water soluble industrial cleaning fluid		Gallons	55
Industrial solvent		Gallons	55
Industrial scrub brushes			15
Industrial squeegees			10
Dip nets (spill equipment)			30
Tyvek hoods			100
Clear PVC booties		Pair	25

PERSONNEL TRAINING AND DRILLS

Operating personnel will be instructed in the proper operation and maintenance of equipment to prevent the discharge of oil and applicable pollution control rules and regulations, including but not limited to:

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

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

The training of all appropriate operating personnel (managers, supervisors and field technicians) in the prompt and effective response to an oil spill incident is an important aspect of Cliff Berry Inc.'s oil spill preparedness. Training is intended to assure that all personnel clearly understand the contents of this plan and their respective roles. Training includes periodic familiarization with the plan and training commensurate with their responsibilities to prepare them in carrying out their job responsibilities in a prompt and efficient fashion. Employees with USDOT responsibilities receive hazardous materials training at least every three years.

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

In addition to the above training, CBI has elected to implement the National Preparedness for Response Exercise Program (PREP) to satisfy exercise requirements under the Oil Pollution Act of 1990 (OPA-90). The PREP is a unified federal effort that incorporates the exercise requirements of the U.S. Coast Guard (USCG), the Environmental Protection Agency (EPA) and the Research and Special Programs Administration (RSPA) Office of Pipeline Safety and the Department of Transportation.

The following pages outline the training and drill plans for Cliff Berry, Inc.

CBI PERSONNEL TRAINING REQUIREMENTS

ON AND OFF SITE EMERGENCY EVENT
(by 29 CFR 1910.120 & USDOT HazMat)

Training is dependent upon responsibilities and the level of response

1. **First Responder Operations Level**
(29 CFR 1910.120 (q)(6)(ii)

Personnel who respond to releases or potential releases of hazardous substances as part of the initial response to the site for the purpose of protecting nearby persons property, or the environment from the effects of the release are trained to respond in a definitive fashion without actually trying to stop the release. Their function is to contain the release from a safe distance, keep it from spreading and prevent exposures.

2. **Hazardous Materials Technician**
29 CFR 1910.120 (q)(6)ii)

Personnel who respond to releases or potential releases for the purpose of stopping the release assume a more aggressive role than a first responder at the operations level in that they approach the point of release in order to plug, patch or otherwise stop the release of a hazardous substance.

Personnel responding to an emergency off site receive at least 24 hours of training equal to the first responder operations level and have additional competencies as outlined in 29 CFR 1910.120 (q)(6)(iii)(A)-(I).

3. **Hazardous Material Specialist**
29 CFR 1910.120 (q)(6)(iv)

Personnel who respond with and provide support to hazardous material technicians have a more specific knowledge of the various substances they may be called upon to contain. They receive at least 24 hours of training equal to the technician level and have additional competencies as outlined in 29 CFR 1910.120 (q)(6)(iv)(A)-(I).

4. **On Scene Incident Commander**
29 CFR 1910.120 (q)(6)(V)

Personnel receive at least 24 hours of training equal to the first responder operations level and have additional competencies as outlined in 29 CFR 1910.120 (q)(6)(v)(A)-(F).

5. **Refresher Training**
29 CFR 1910.120 (q)(6)(I)

Personnel who are trained in accordance with paragraph (q)(6) shall receive annual refresher training of sufficient content and duration to maintain their competencies or shall demonstrate competency in those areas at least yearly.

6. **USDOT Hazardous Materials**
49 CFR 130, 172, 173 & 177

Personnel who are trained in accordance with the sections noted above shall receive refresher training of sufficient content and duration to maintain their competencies or shall demonstrate competency in those areas at least every three years.

POST-EMERGENCY CLEANUP
(OFF-SITE)

Personnel
OSHA Instruction CPL-2-2.5(11/05/99)

1. **General and Occasional Site Workers**
29 CFR 1910.120(e)(3)

For a high magnitude of risk job, 40 hours of initial training and three days of supervised field experience under the direct supervision of a trained, experienced supervisor. Annual 8 hour refresher training.

For a limited task or fully characterized area worker, 24 hours of initial instruction and the minimum of one day actual field experience under the direct supervision of a trained, experienced supervisor. Annual 8 hours of refresher training.

2. **Management and Supervisor**
29 CFR 1910.120(e)(4)

40 hours of initial training, three days of supervised field experience and at least eight additional hours of specialized training at the time of job assignment on such topics as, but not limited to the employer's safety and health program and the associated employee training program.

3. **Refresher Training**
29 CFR 1910.120(e)(8)

Personnel specified in 1. and 2. above shall receive 8 hours of refresher training annually and any critiques of incidents that have occurred in the past year that can serve as training examples of related work, and other relevant topics.

4. **Equivalent Training**
29 CFR 1910.120(e)(9)

Employers who can show by documentation or certification that an employee's work experience and/or training has resulted in training equivalent to the training required in 1 & 2 above, shall not be required to prove the initial training requirements. Employer shall provide a copy of the certification or documentation to the employee upon request.

POST-EMERGENCY ON SITE

1. **Site Employees, Management and Supervision**
29 CFR 1910.120 (q)(11)(ii)

Employees are trained according to 29 CFR 1910.38(a) emergency action plan; 1910.34 respiratory protection; 1910.1200 hazard communication and other training made necessary by the task.

2. **Refresher Training**
29 CFR 1910.38 (a)(5)(iii)(A)-(C)

Emergency plan training is required initially with the plan is developed, whenever the employee's responsibilities or designated actions under the plan change, or whenever the plan is changed.

29 CFR 1910.120(h)
Employers shall provide employees with information and training on hazardous chemicals in their work area at the time of initial assignment, and whenever a new hazard is introduced into their work area.

OPA 90
PREP TRIENNIAL DRILL SCHEDULE

Triennial Drills must include the following exercises: (1)

Terminal and Pipeline Drills

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

Corporate Response Team Drills

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

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

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FACILITY EMERGENCY

Name of Facility:	Canaveral Facility
Type of Facility:	Oily Wastewater Transfer Facility
Location of Facility:	5855 Industrial Drive Cocoa, Florida 32927

Name and Address of Owner or Operator:

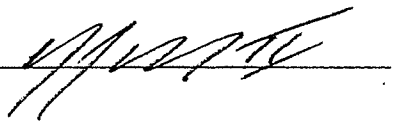
Name:	Cliff Berry, Inc.
Address:	PO Box 13079 Fort Lauderdale, FL 33316

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

Name:	Cliff Berry, II
Title:	President

MANAGEMENT APPROVAL

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



Signature

Name: Cliff Berry, II
Title: President

Review and Update

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

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

Emergency Response Arrangements

1.	Fire Department:	Brevard County Fire Department
2.	Police Department:	Brevard County Sheriff's Office
3.	Hospital:	Wuesthoff Medical Center
4.	Emergency Response Contractor:	Cliff Berry, Inc.

EMERGENCY COORDINATORS

1.	Primary Emergency Coordinator	
Name:	Mark Groothouse	
Title:	Assistant Facility Manager	
Address:	8089 Windover Way	
	Titusville, Florida 32780	
Phone:	Office:	(321) 639-4199
	Home:	(772) 466-2678
	Cell:	(321) 578-4450
2.	Back-up Emergency Coordinator	
Name:	Paul Meding	
Title:	Area Manager – Port Canaveral, Fort Pierce and Orlando	
Address:	3404 S.W. Catskill Drive	
	Fort Pierce, FL 34953	
Phone:	Office:	(321) 639-4199
	Home:	(772) 879-0128
	Cell:	(772) 519-6015
3.	Back-up Emergency Coordinator	
Name:	Steve Collins	
Title:	ESOH Director	
Address:	4871 NE 2nd Ave	
	Fort Lauderdale, FL 33334	
Phone:	Office:	(954) 763-3390
	Home:	(954) 594-3873
	Cell:	(954) 594-3873

Canaveral Facility Fax Number: (321) 639-4164

24 Hour Emergency Number: (800) 899-7745

Emergency Procedures – Responsibilities of the Emergency Coordinator or Designee

1. Activate the Facility alarm/communication system to notify all facility personnel by:
   a. Announce the emergency situation using cell phones.
   b. Notify facility personnel by word of mouth.

2. Notify appropriate State and Local Agencies with designated response roles if their help is needed. In the case of fire or explosion:
   a. Call 911 to notify the fire department.

3. Identify the character, exact source, amount and extent of any released materials. This may be done by observation, review of facility records or chemical analysis.

4. Assess possible hazards to human health of the environment that may result from the release, fire, or explosion. This assessment must consider both direct and indirect effects of the release, fire or explosion. If assessment indicates that evacuation of local areas may be advisable, immediately notify appropriate local authorities. Be available to help local authorities to decide whether local area should be evacuated.

5. Notify immediately the government official designated as the On Scene Coordinator (OSC) of the National Response Center using their twenty-four (24) hour toll free number (800) 424-8802. The report must include:
   a. Name and telephone number of person reporting,
   b. Name and address of the facility
   c. Time and type of incident (release, fire, etc.),
   d. Name and quantity of the material(s) involved,
   e. The extent of injuries, if any, and
   f. The possible hazards to human health or the environment outside the facility.

6. Take all reasonable actions necessary to ensure that releases, fires and explosions do not occur, recur, or spread to other used oil or waste at the facility.

7. After the emergency is over, provide for the recycling, storing or disposal of recovered material or material that results from a release, fire or explosion. In the affected area(s) of the facility make sure that no waste o used oil that may be incompatible with the release material is recycled, treated, stored or disposed of until clean-up procedures are completed. All emergency equipment listed in the contingency plan need to be cleaned and fit for its intended use before operations are resumed.

8. Notify the Regional Administrator and appropriate State and Local Authorities that the facility is in compliance with 40 CFR part 279.52 before resuming operations in the affected area(s) of the facility.

9. Note in the operating record the time, date and detail of the incident that requires implementing the contingency plan.

10. Submit a written report within fifteen (15) days after the incident to the Regional Administrator. The report must include:
    a. Name, address and telephone number of the owner or operator,
    b. Name, address and telephone number of the facility,
    c. Date, time and type of incident (release, fire, etc.),
    d. Name and quantity of materials involved,
    e. The extent of injuries, if any,
    f. An assessment of actual or potential hazards to human health or the environment, where applicable, and
    g. Estimated quantity and disposition of recovered material that resulted from the incident.

Requirements for Notification

1. Name and telephone number of person making the notification

2. Name and address of the facility

3. Type and time of incident

4. Name and quantity of the material involved

5. The extent of injuries, if any

6. The possible hazards to human health or the environment outside the facility

7. The name and telephone number of the person or persons to be contacted for more information. See list of Emergency Coordinators in this section.

8. Wait for the other party to hang up – do not hang up first.

Emergency Contact Phone Numbers

1. Primary Emergency Contact Person – Mark Groothouse ..... (321) 578-4450
   Office Phone: (321) 639-4199
   Office Address: 5855 Industrial Drive, Cocoa, Florida 32927
   Home Address: 8089 Windover Way, Titusville, Florida 32780

   Secondary Emergency Contact Person – Paul Meding ..... (772) 519-6015
   Office Phone: (772) 466-4063
   Office Address: 400 Angle Road, Fort Pierce, FL
   Home Address: 3404 S.W. Catskill Drive, Fort Pierce, FL
2. Fire 911
   Brevard County Fire Department ..... (321) 868-3330
3. Police 911
   Brevard County Sheriff's Office ..... (321) 264-2501
4. Ambulance 911
5. Nearest Emergency Medical Facility

   Wuesthoff Medical Center
   110 Longwood Avenue, Rockledge, Florida ..... (321) 636-2211
6. Nearest Hospital

   Wuesthoff Medical Center
   110 Longwood Avenue, Rockledge, Florida ..... (321) 636-2211
7. National Response Center ..... 1(800) 424-8802
8. Federal – U.S. EPA, Region IV ..... 1(404) 562-8357
9. State – Florida DEP ..... 1(407) 897-4100
   Emergency Response ..... 1(800) 320-0519
10. Local – Brevard County Environmental Remediation and Compliance ..... (321) 633-2017
11. Chemtrec ..... 1(800) 424-9300
12. U.S. Coast Guard ..... (321) 784-6780
13. 3E Company ..... 1(800) 360-3220

GENERAL RESPONSIBILITIES

Personnel Assignments

A. Coordinator (Emergency Coordinator)
    a. Mark Groothouse (Leader)
    b. Paul Meding (Back-up)
    c. Steve Collins (Back-up)

B. Communications
    a. Paul Meding (Leader)
    b. Steve Collins (Back-up)
    c. Mark Groothouse (Back-up)

C. Evacuation
    a. Mark Groothouse (Leader plant and office)
    b. Paul Meding (Back-up plant and office)

D. Emergency Situation
    a. Emergency assessment
        i. Steve Collins (Leader)
        ii. Paul Meding (Back-up)
        iii. Mark Groothouse (Back-up)

    b. Spill containment
        i. Paul Meding (Leader)
        ii. Mark Groothouse (Back-up)
        iii. Natalie Hood (Back-up)

E. Emergency Team
    a. Fire fighting and spill containment
        i. Paul Meding
        ii. Mark Groothouse

F. First Aid
        i. Paul Meding
        ii. Natalie Hood

Description of Personnel Assignments

A. Emergency Coordinator: Assess all possible hazards for severity. Responds to, coordinates and aids in remediation of all hazards. Coordinates all evacuation and return to normal operation. In the event the Communication Leader is out of the office the coordinator's first back-up becomes the Communication Leader.

B. Communication Leader: Responsible for informing the office and plant personnel of hazards. Informs the evacuation leaders of need to evacuate. Informs the main office of the situation. Handles media communication in the event that the Emergency Coordinator is out of the office, then the Communication Leader becomes the Emergency Coordinator.

C. Evacuation Leader: Responsible for guiding personnel to staging area. Makes sure that all personnel are out of the office in an evacuation. Assists coordinator in his/her tasks. Conducts head count at the staging area.

D. First Aid Provider: Responsible for cardio pulmonary resuscitation and first aid to employees in the case of accidents.

FIRE RESPONSE

Fire Control Systems and Equipment

1. All plant operational personnel have cellular phones so that they are in constant communication with each other at all times

2. Fire control equipment consists of:
    a. Numerous fire extinguishers are located around the plant and property. They are inspected and certified (tagged) on an annual basis.

Emergency Procedures

Fire

1. Upon initial sighting, notify all personnel via cellular phones and notify Fire Department immediately by calling 911. If fire is in its incipient stage, respond with fire extinguisher.

2. Immediately alert emergency coordinator by best available means.

3. Emergency coordinator will assess danger and will initiate response to fire, shut down procedure, and evacuation, as necessary.

4. All non-essential personnel should evacuate as soon as the alarm sounds.

5. Emergency personnel will be given the following information in order to make reports:
    a. Name and telephone number of person reporting,
    b. Name and address of the facility
    c. Time and type of incident (release, fire, etc.),
    d. Name and quantity of the material(s) involved,
    e. The extent of injuries, if any, and
    f. The possible hazards to human health or the environment outside the facility.

6. If trapped by a fire in area:
    a. Close all doors between you and the fire and seek alternate exit including breaking windows or walls, and if not available,
    b. Seal all door cracks and vents the best you can,
    c. Use the telephone to call the fire department and give your situation, and
    d. Sit on the floor calmly as far away as possible from the fire.

Emergency Evacuation

- Upon encountering fire or smoke immediately alert the Coordinator, sound the alarm and commence evacuating the plant, property and office areas.

- Depending on the location of the emergency, personnel should evacuate via the front or rear of the building and proceed to the staging area.
    - The staging area at this facility is the northeast corner of the parking area.

- CBI management, under direction from the Fire Chief, will permit re-entry into the building after resetting the fire alarm. At that time the emergency coordinator will instruct CBI personnel and all tenants to return to their office.

Shutdown of Operation

- Shut down all pumps or other source, if it can be done safely

- Close man ways and access ports to tanks and rail cars, as appropriate,

- Close all valves if it can be done safely

- Remove vehicles from the site if it can be done safely,

- Shut down power to product movement areas,

- Close warehouse doors after confirming employees have evacuated,

- Open perimeter access gate for emergency crew,

- Move fire extinguishers to the location for the emergency crews,

- All nonessential personnel are to evacuate to the premises immediately. Personel should report to the staging area so they can be counted.

- Plant personnel will provide security for the site until emergency crews arrive, and

- UNDER NO CIRCUMSTANCES IS ANYONE TO ENDANGER THEMSELVES OR OTHERS IN ORDER TO PROTECT EQUIPMENT OR PRODUCT. IF YOU ARE IN DOUBT SACRIFICE THE EQUIPMENT AND PRODUCT.

Fire and Explosion

- Do not attempt to fight a fire unless you have been trained to do so.

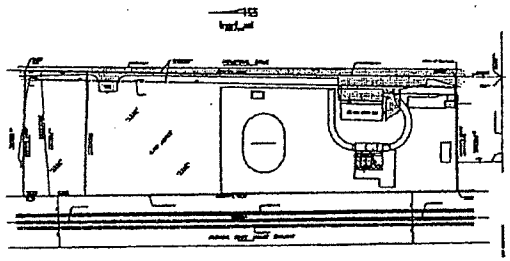
- If a fire is too large or the first attempt to extinguish is unsuccessful, do not attempt a second try – EVACUATE.

- Attempts at fire fighting should only be made during the fires incipient stage.

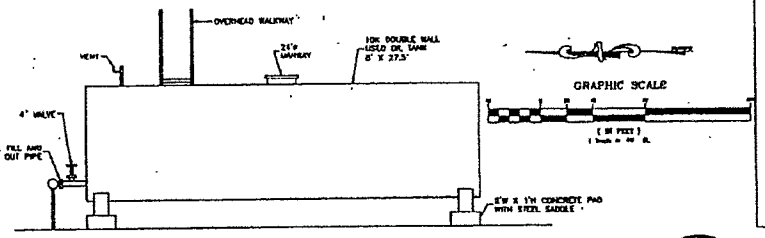
    - Only hand held portable fire extinguishers will be used by company employees when responding to fires. No hose lines will be used by company employees.

    - Company employees will not attempt to extinguish small or large fires with the potential to change rapidly, for example:
        - Pump seal fires on a pressurized system, or
        - Ground fires in excess of 100 square feet in a congested process area.

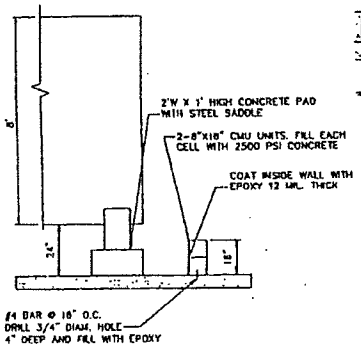
– CBI – Canaveral Facility – Evacuation Routes –



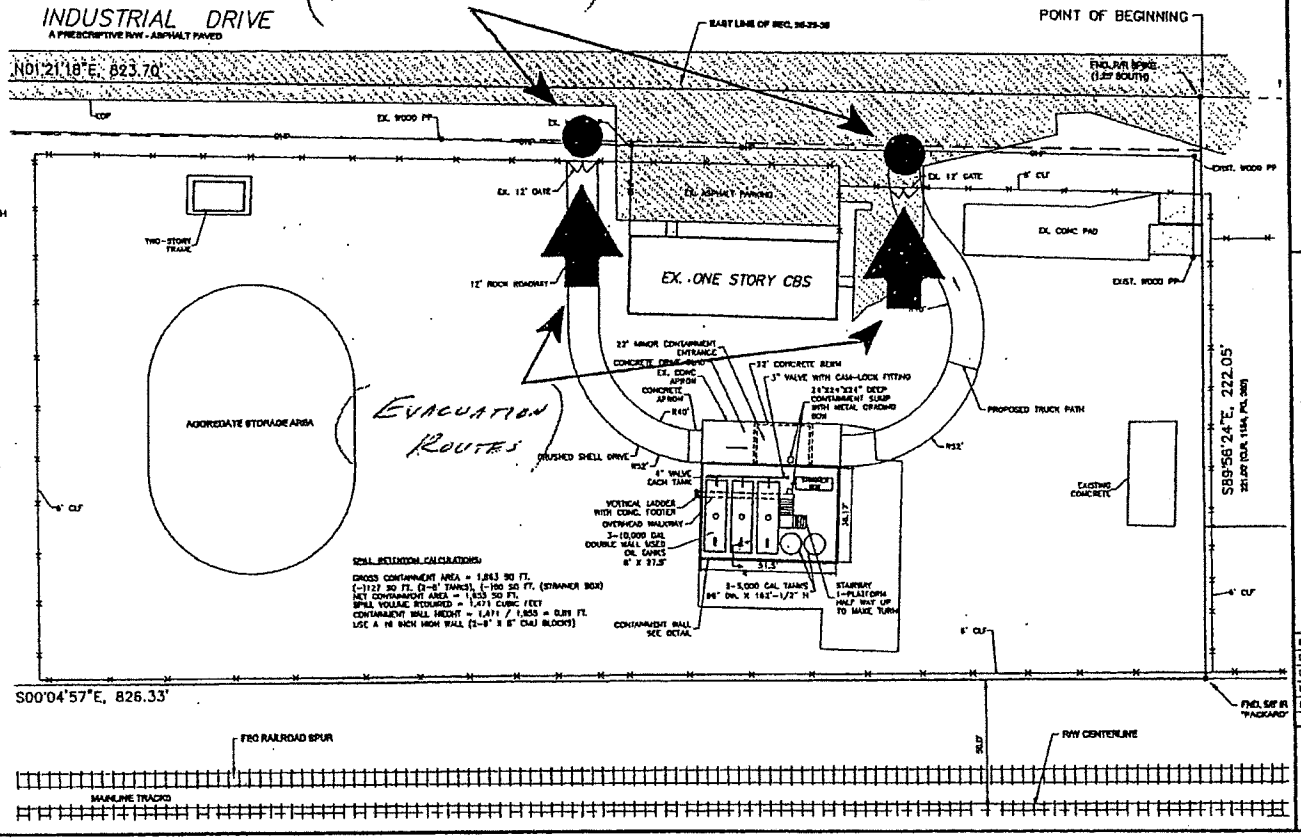
LOCATION MAP
SCALE: 1"=100'



TYPICAL TANK ELEVATION



SECTION A–A
1"=2'



CBI CANAVERAL FACILITY
5855 INDUSTRIAL DRIVE
COCOA, FLORIDA

AS-BUILT ENGINEERING PLAN
FOR USED OIL STORAGE

CARNAHAN-PROCTOR-CROSS, INC.
CONSULTING ENGINEERS · SURVEYORS · PLANNERS

SCALE:	1"=30'
DATE:	6/28/95
DRAWN BY:	RCW
CHECKED BY:	DMA
DESIGNED BY:	DMA

C1 OF 1

DAL AMBROSE, P.E.
FLORIDA REGISTRATION NO. 12601

SEAL

EXPLOSION RESPONSE

Bomb Threat Procedure

1. Purpose:
    a. To provide for the orderly gathering of information during a potentially stressful situation.

2. Responsibility
    a. Anyone receiving a bomb threat has the responsibility to gather as much information as possible and report the facts to plant management. Use the attached checklist.

3. Safety
    a. Remain calm. This will allow the maximum amount of information to be exchanged. Do not antagonize the other party.

4. Procedure – Handling the Call
    a. Try to keep the caller on the line.

    b. Try to alert office mates to notify the Emergency Coordinator to come to you

    c. Make notes and COMPLETE THE BOMB THREAT CALL CHECKLIST

    d. Get specific information on what is going to happen.
        i. When will it go off?
        ii. Where is it placed?
        iii. What does it look like? Describe it.
        iv. When was it put there?
        v. How do you know about this?
        Note: Ask caller to repeat the information, if you did not get it all.

    e. Take notes on additional information about the caller:
        i. Name
        ii. Age
        iii. Sex
        iv. Mental condition – joking, angry, etc.
        v. General condition – calm, frantic?
        vi. Voice characteristics – accent (hint of ethnicity?), speech defect, slurred?

f. What background noises are present?
    i. Music?
    ii. Trucks?
    iii. Freeway?
    iv. Trains?

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

5. Search – Overt type
Potential bombs have no standard appearance. Be alert for any boxed (cardboard, metal o wood), suitcases, cans, sections of pipes or other objects that appear to be out of place.
    a. Begin the search around the outside of each building and work inward. The employees most familiar with a building should search that building.

    b. Inside each building, begin along the outside walls and work to the center. Ground floors first then upper floors.

    c. Start with easily accessible places.

    d. Look for recently disturbed items or items out of place.

    e. Any suspicious objects should be reported to the Emergency Coordinator. DO NOT ATTEMPT TO HANDLE OR DISTURB ANY SUSPECTED BOMB. Write on a piece of paper any information that would identify the suspicious object (size, type of container) and its exact location. Also note the route of egress from the object.

    f. If one suspected bomb is located, continue the search, if it appears this can be done reasonably safely, until completed. More than one device may have been set.

g. Open all doors and windows in the building and evacuate to a minimum of 300 feet. This may entail moving the staging area.

h. The employee in charge (Emergency Coordinator or other higher authority) and the person receiving the call should meet with the police when they arrive (however, do not hang up on the caller if they are still on the line.) Tell the police the exact location of any suspicious objects and the egress routes from the object.

i. In the event of detonation activate the emergency response plan. See section 9.

j. Do not return to the building or location until the "All Clear" is received from competent authority. See Section 13 for "All Clear" procedures.

6. Publicity
   a. All persons involved in the incident should be encouraged to keep the incident confidential.

   b. All inquiries from the public news media should be directed to and handled by the Communications Leader. If the Communications Leader is not available, take a number and state that a return call will be made.

Bomb Threat Call Checklist

Questions to Ask Exact Wording of Threat

1. When is the bomb going to explode?

   _____

2. Where is it right now? _____
3. What does it look like: _____
4. What kind of bomb is it? _____
5. Did you place the bomb? _____
6. Why: _____
7. What is your address? _____
8. What is your name? _____

Sex of caller _____ Age _____ Race _____ Length of call

Caller's Voice:

☐ Calm	☐ Nasal	☐ Loud	☐ Deep Breathing
☐ Angry	☐ Laughing	☐ Lisp	☐ Clearing throat
☐ Excited	☐ Crying	☐ Raspy	☐ Disguised
☐ Slow	☐ Normal	☐ Deep	☐ Accent
☐ Rapid	☐ Distinct	☐ Ragged	☐ Familiar
☐ Soft	☐ Slurred	☐ Cracking voice	☐ Stutter

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

Background sounds:

☐ Street noises	☐ House noises	☐ Factory machinery	☐ Local
☐ Crockery	☐ Motor	☐ Animal noises	☐ Clear
☐ Voices	☐ Long distance	☐ Office machinery	☐ Booth
☐ PS System	☐ Music	☐ Static	☐ Other

Threat Language

☐ Well spoken (educated	☐ Irrational
☐ Message read by threat maker	☐ Incoherent
☐ Foul language	☐ Tapered

Report call immediately to Emergency Coordinator

If threat is considered valid DIAL 911

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

Person receiving call _____ Position/Title: _____

Phone number call received on: _____

Phone call taped: ___ Yes ___ No.

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

Remarks: _____

_____

_____

_____

_____

_____

_____

End of Bomb Threat Call Checklist

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ALL CLEAR

All Clear Procedure

The only people allowed to issue the "All Clear" are:

- The Emergency Coordinator
- The Communication Leader

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

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

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

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

- Hard hat
- Safety glasses
- Safety shoes (reinforced toe)
- Respirator with appropriate cartridge
- Coveralls
- Air monitor suitable for the conditions
  Note: No CBI employee will enter the space if the conditions are Immediately Dangerous to Life and Health (IDLH) or if any life support apparatus is required for entry.

It is the responsibility of the Emergency Coordinator to ensure that all local emergency response personnel have received all the information they require and are adequately prepared to respond again if necessary (e.g. do not send the emergency responders away if hazardous conditions persist.)

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MEDICAL EMERGENCY

Medical Emergency Procedure

- Initial report is to be made to the Facility Manager or the Operations Manager

- An assessment will be made as to the severity of the incident determining if medical assistance it to be called. In general if the employee is unable to walk on his/her own, he/she is to be kept at the scene while an ambulance is called.

- If the incident does not require an ambulance the employee is to be transported to the applicable medical facility by supervisory personnel. Details of the incident along with other information such as a Safety Data Sheet (SDS) can be provided to medical personnel. The supervisor will remain at the facility until a report on the employee's condition can be obtained.

- At least one office or plant personnel are to be trained in First Aid and CPR if the facility is not within a short response time from emergency response personnel. This training is to be used until relieved by rescue personnel. **See Section 9 for a phone list.**

Rescue

Rescue operations are to be performed by outside emergency response personnel whenever possible. CBI personnel will respond to rescue situations only when no outside assistance is available and there is no immediate danger to life or health.

- All rescues will be directed by the Emergency Coordinator.

Rescue Criteria

- Rescue is to be attempted when the location of the employee is known.

- Rescue will not be attempted when the structure is involved in a fire.

- Rescue activities involved with a product release will fall within the parameters of this SPCC plan.

- No rescue efforts are to be made with less than three employees. On employee is to remain outside the hazard area at all times. If rescue is clearly a medical emergency and no hazardous environment exists, rescue may be attempted by less than three people.

- Communication must be maintained at all times. This is to be accomplished through the use of two way radios or other secure means. If a hazardous atmosphere is present only the employee remaining outside the hazardous environment will be tasked with communications, and if a choice exists, by means of an intrinsically safe radio.

INCLEMENT WEATHER

Inclement Weather and Natural Disaster

1. In the event of severe inclement weather (hurricane, electrical storm, tornado) the Emergency Coordinator will make the assessment of the danger.

2. If the assessment is not severe, operations may simply be suspended until the storm passes. The Emergency Coordinator will give a verbal "All Clear" to employees once the inclement weather has passed. This covers incidents such as thunder storms and sporadic heavy rains which interfere with safe operations. During these times shelter will be sought in the plant and main offices.

3. If the assessment is severe, the Emergency Coordinator will discuss the assessment with senior management, and as a result, notify the Communication Leader to cancel the work day.

4. If the work day has not started the Communication Leader will communicate with facility personnel, whether at home or in the office, and inform them through the best available means.

5. If an order to evacuate and go home is given facility personnel will check out with the Communication Leader prior to exiting the facility to ensure all are counted.

6. If the imminent danger does not permit for evacuation, inform the Emergency Coordinator (who will inform the Communication Leader), search for an inside corner or wall away from glass windows and product storage and remain there in a seated position until the danger has passed. In all cases the Communication Leader shall remain informed as to where facility personnel are staying during the inclement weather.

Preparations for Hurricanes

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

1. All items which are not securely anchored will be moved into the warehouse on a space available basis. These include empty containers, hoses, mats, pallets and then full containers, fittings, wall mounted extinguishers, boats, other loose objects and vehicles, in order of probability that these objects could become airborne.

2. All empty trailers are to be moved as far away from the building as possible. This includes all bulk trailers, box trailers, emergency response trailers, spill trailers and drum trailers.

3. If there is ample time to conduct preparations, secure plywood sheets and lag into the walls effectively covering windows.

4. Move as much equipment as possible above ground floor level. An ideal height for water sensitive items is five (5) feet.

5. All antennas or other high flying apparatus should be dismantled and lowered to ground level. Any removable parts should be placed inside the main building or warehouse.

6. All vertical storage tanks should be filled with at least one (1) foot of product or water to keep the tank from blowing over in hurricane force winds. This procedure only needs to be followed if hurricane winds in excess of 100 miles per hour are predicted.

CBI

BIOMEDICAL WASTE OPERATING PLAN

Cliff Berry, Incorporated
Applicable to all CBI facilities where biomedical waste is stored or transported.

TABLE OF CONTENTS

I. PURPOSE

a. The purpose of this Biomedical Waste Operating Plan is to provide guidance and describe requirements for the proper management of biomedical waste at our facility. Guidelines for management of biomedical waste are found in Chapter 64E-16, Florida Administrative Code (F.A.C) and in section 381.0098, Florida Statutes.

II. TRAINING OF PERSONNEL

a. Biomedical waste training will be scheduled as required by paragraph 64E-16.003(2)(a) F.A.C.. Training sessions will detail compliance with this operating plan and with chapter 64E-16 F.A.C.. Training Sessions will include all of the following activities that are carried out in our facility:
    i. Definition and identification of biomedical waste
    ii. Segregation
    iii. Storage
    iv. Labeling
    v. Transport
    vi. Procedure for decontamination biomedical waste (if performed at the facility)
    vii. Contingency plan for emergency transport
    viii. Procedure for containment
    ix. Treatment method (if performed at the facility)

b. Training for activities performed at the facility is outlined in Attachment A.

c. Our facility must maintain records of employee training. These records are kept at the corporate headquarters and copies may also be kept at this facility. Training records will be kept for participants in all training sessions for a minimum of three (3) years and will be available for review by Department of Health (DOH) inspectors. An example of an attendance record is appended as Attachment B.

III. DEFITION, IDENTIFICATION AND SEGREGATION OF BIOMEDICAL WASTE

a. Biomedical waste is any solid or liquid waste which may present a threat of infection to humans. Biomedical waste is further defined in subsection 64E-16.002(2) F.A.C..

b. Biomedical waste is not generated at this facility, however, it is transported to this facility for temporary storage and may include red bag waste and sharps containers and related packaging. Biomedical waste will be stored in an area specifically designated and with appropriate biomedical waste signage.

IV. CONTAINMENT

a. Red bags and sharps containers for containment of biomedical waste shipped to this facility will comply with the required physical properties. CBI personnel will obtain assurance from the generator that the biomedical waste containers used are in compliance. Filled red bags and sharps containers will be sealed at the point of origin. Red bags, sharps containers and outer containers of biomedical waste, when sealed, will not be opened in this facility. Ruptured or leaking packages of biomedical waste will be placed into a larger container without disturbing the original seal.

V. LABELING

a. All sealed biomedical waste red bags and sharps containers will be labeled with the originating facility's name and address prior to offsite transport. If a sealed red bag or sharps container is placed into a larger red bag prior to transport, placing the facility's name and address only on the exterior of the bag is sufficient.
b. Outer containers must be labeled with the next transporter's name, address, registration number and 24-hour phone number.

VI. STORAGE

a. When sealed, red bags, sharps containers and outer containers will be stored in areas that are restricted through the use of locks, in addition to signs or location. The 30-day storage time limit period will commence when the first biomedical waste item is placed into storage.
b. Biomedical waste storage areas will be constructed of smooth, easily cleanable materials that are impervious to liquids. These areas will be regularly maintained in a sanitary condition. The storage area will be vermin/insect free. Storage areas will be conspicuously marked with a six-inch international biomedical hazard symbol and will be secure from vandalism.

VII. TRANSPORT

a. Transport to our facility is provided by CBI employees in accordance with our transporter permit. In the event CBI uses a subcontractor we will negotiate for the transport of biomedical waste only with a DOH-registered company. If we transport the materials ourselves we will maintain a log of all biomedical waste transported by any employee and the log will contain waste amounts, dates, and documentation that the waste was accepted by our permitted facility. If we use a subcontractor we will have on file the pick-up receipts provide to us for the last three (3) years. Only those employees completing the training outlines in this plan are authorized to transport biomedical waste. Transport out of our facility will be performed by the contracted vendor within the 30-day requirement for our facility permit.

VIII. PROCEDURE FOR DECONTAMINATING BIOMEDICAL WASTE SPILLS

a. Surfaces contaminated with spilled or leaked biomedical waste will be decontaminated as part of the cleaning process. If spilled onto the truck the driver will wear appropriate personal protective equipment (PPE) and scrape, absorb, remove or wash the truck as needed to remove bulk material then follow up with disinfectant. All solid material including absorbent will be placed into red bags or sharps containers as appropriate and sealed. Rinse material will be solidified with absorbent or drained to a sewage connection. The disinfectant utilized by this facility is a bleach solution of at least 100 parts per million (ppm) free chlorine, that will be used for at least three minutes. Common household bleach (3 – 6% sodium hypochlorite) may be diluted up to 300 times to achieve 100 ppm concentration. PPE should include a pair of examination gloves, a face shield and a N95 mask/half face respirator or full face respirator with particulate filter and may include an apron or other clothing providing splash protection.

IX. CONTINGENCY PLAN

a. If CBI is unable to transport the waste to this facility CBI will then contact a registered biomedical waste transporter. This should be coordinated through CBI corporate offices and include the Disposal Services Manager and Accounting.

X. BRANCH AND CORPORATE OFFICES

a. CBI operates several branch offices that are permitted for the management of biomedical waste.

b. The CBI corporate offices may be reached at (954) 763-3390 and a manager is on call 24/7 via an answering service after normal business hours.

XI. MISCELLANEOUS

a. This plan is incorporated into the "Spill Prevention Control and Countermeasure Plan and Emergency Procedures" for this facility and a copy is located at the CBI corporate offices, 851 Eller Drive, Fort Lauderdale, FL 33316 and at this facility.

Attachment A: BIOMEDICAL WASTE TRAINING OUTLINE

I. Biomedical waste transport regulations 64E-16.008 Florida Administrative Code (F.A.C)
   a. Acceptance criteria
   b. Receipts
   c. No leaking or compacting
   d. Transfer between vehicles is not allowed unless at a permitted facility, except in an emergency
   e. Transport only to permitted facilities
   f. Vehicle markings and international biological hazard symbol
   g. Vehicle fully enclosed and secured when unattended
   h. Accident procedures and contact with DOH, including use of rental vehicles
   i. Decontamination of rental vehicles

II. Registration of biomedical waste transporters 64E-16.009 F.A.C.
   a. Registration is required at and above 25 pounds of biomedical waste generated every 30 days
   b. Submission of registration on form DH 4106
   c. Expiration of permit annually on September 30 unless renewed and accompanied by annual report on form DH 4109.
   d. Not more than 30-day notice to DH of any changes to registration form currently on file
   e. False information or hindrance of inspection may result in revocation of permit

III. Permits 64E-16.011
   a. Annual permit required
   b. Exemption for generation of less than 25 pounds every 30 days
   c. Permits are not transferrable to another person/entity
   d. Permits are only effective for the facility (branch office) to which they are written

IV. Spill clean-up and over-packing
   a. Recognizing insufficient packing, segregation or pre-spill issues
   b. Use of absorbents and tools to clean up a spill
   c. Disinfection and dilution of bleach
   d. Over-packing and repacking
   e. Selection and use of personal protective equipment (PPE)

Attachment B: BIOMEDICAL WASTE TRAINING ATTENDANCE

(Example)

FACILITY NAME: Cliff Berry, Incorporated
NAME OF TRAINER: _____
DURATION OF TRAINING: _____ HOURS
TRAINING DATE: _____
PURPOSE OF TRAINING: ____Initial Assignment ____ Annual Refresher ____Update

TRAINING ROSTER

PARTICIPANT'S NAME	SIGNATURE

Attachment C: PLAN FOR TREATMENT OF BIOMEDICAL WASTE

CBI does not engage in the treatment of biomedical waste and acts only as a transfer facility.

Attachment D: STATE OF FLORIDA DEPARTMENT OF HEALTH REGULATIONS 64E-16

I. State of Florida, Bureau of Community Environmental Health Chapter 64E-16, Florida Administrative Code Biomedical Waste
II. State of Florida, Florida Statutes Chapter 381 Public Health: General Provisions, 381.0098 Biomedical Waste

ATTACHMENT 12
Financial Assurance

Florida Department of Environmental Protection

Bob Martinez Center
2600 Blair Stone Road MS 4548
Tallahassee, Florida 32399-2400

Rick Scott
Governor

Carlos Lopez-Cantera
Lt. Governor

Jonathan P. Steverson
Secretary

January 24, 2017

Via e-mail: KBrandenburg@CliffBerryInc.com

Ms. Kelly Brandenburg
Regulatory Affairs Manager
Cliff Berry, Inc.
P. O. Box 13079
Fort Lauderdale, Florida 33316-3079

Re: FLR 000 119 792 – Cliff Berry, Inc. - Canaveral Facility
FLD 000 831 156 – Cliff Berry, Inc. - Fort Lauderdale
FLR 000 119 784 – Cliff Berry, Inc. - Jacksonville Facility
FLD 058 560 699 – Cliff Berry, Inc. - Miami Facility
FLR 000 083 071 – Cliff Berry, Inc. - Port Everglades Facility
FLR 000 013 888 – Cliff Berry, Inc. - Tampa Facility

Dear Ms. Brandenburg:

I reviewed the documentation submitted to demonstrate financial assurance for the above referenced facilities and find it is in order. U.S. Bank National Association standby trust fund agreement, entered into as of January 23, 2017 and for account number 801871400, is acceptable as to form and content. In addition, Florida Community Bank, National Association letter of credit number 7200000139 remains adequate. Therefore, the above referenced facilities are in compliance with the financial assurance requirements of 40 CFR Part 264, Subpart H, as adopted by reference in Rule 62-701.630, Florida Administrative Code, at this time.

Increased financial assurance associated with recently submitted estimates is due by April 30, 2017. Please contact me at (850) 245-8743 if you have any questions.

Sincerely,

Tor JM Bejnar

Tor JM Bejnar
Environmental Specialist
Financial Assurance Working Group

cc: Bheem Kothur, DEP/Used Oil Program

ATTACHMENT 13
Site Drawings