PORT EVERGLADES FRANCHISE APPLICATION

An application will not be deemed complete and ready for processing until all required documents and fees are received.

A separate application must be filed for each type of franchise applied for.

FRANCHISE TYPE
CHECK ONE

[ ] STEAMSHIP AGENT [ ] STEVEDORE

[ ] CARGO HANDLER [ ] TUGBOAT & TOWING [X] VESSEL BUNKERING

[ ] VESSEL OILY WASTE REMOVAL [ ] VESSEL SANITARY WASTE WATER REMOVAL

[ ] MARINE TERMINAL SECURITY FIREARMS CARRYING SECURITY PERSONNEL

[ ] MARINE TERMINAL SECURITY NON-FIREARMS CARRYING SECURITY PERSONNEL

Note: Applicant is the legal entity applying for the franchise. If the Applicant is granted the franchise, it will be the named franchisee. All information contained in this application shall apply only to the Applicant, and not to any parent, affiliate, or subsidiary entities.

Applicant's
Name Tropic Oil Company
(Name as it appears on the certificate of incorporation, charter, or other legal documentation as applicable, evidencing the legal formation of the Applicant)

Applicant's Business Address 9970 NW 89th CT, Miami, Florida, 33178
Number / Street City/State/Zip

Phone # (305) 888 - 4611 E-mail address sgorey @ tropicoil.com

Fax #: (305) 887 - 3166

Name of the person authorized to bind the Applicant (This person's signature must appear on Page 13.)

Name Stephen Gorey

Title President

Business Address 9970 NW 89th CT, Miami, Florida, 33178
Number / Street City/State/Zip

Phone # (305) 888 - 4611 E-mail address sgorey @ tropicoil.com

Fax #: (305) 887 - 3166

Provide the Name and Contact Information of Applicant's Representative to whom questions about this application are to be directed (if different from the person authorized to bind the Applicant):

Representative's Name Osvaldo Roche

Representative's Title Plant Manager

Representative's Business Address 9970 NW 89th CT, Miami, Florida, 33178
Number / Street City/State/Zip

Representative's Phone # (305) 888 - 4611

Representative's E-mail address oroche @ tropicoil.com

Representative's Fax #: (305) 887 - 3166

PLEASE COMPLETE THIS APPLICATION AND LABEL ALL REQUIRED BACKUP DOCUMENTATION TO CLEARLY IDENTIFY THE SECTION OF THE APPLICATION TO WHICH THE DOCUMENTATION APPLIES (I.E...., SECTION A, B, C, etc.).

Section A

1. List the name(s) of Applicant's officers, including, CEO, COO, CFO, director(s), member(s), partner(s), shareholder(s), principal(s), employee(s), agents, and local representative(s) active in the management of the Applicant.

Officers:

Title C.E.O
First Name George Middle Name
Last Name LeVasser
Business Street Address 9970 NW 89th CT
City, State, Zip Code Miami, Florida, 33178
Phone Number (305) 888 - 4611 Fax Number (305) 887 - 3166
Email Address glevasser @ tropicoil.com .

Title President
First Name Stephen Middle Name
Last Name Gorey
Business Street Address 9970 NW 89th CT
City, State, Zip Code Miami, Florida, 33178
Phone Number (305) 888 - 4611 Fax Number (305) 887 - 3166
Email Address sgorey @ tropicoil.com .

Title C.F.O
First Name Carlos Middle Name
Last Name Oro
Business Street Address 9970 NW 89th CT
City, State, Zip Code Miami, Florida, 33178
Phone Number (305) 888 - 4611 Fax Number (305) 887 - 3166
Email Address coro @ tropicoil.com .

Title Vice President
First Name David Middle Name
Last Name Gurney
Business Street Address 9970 NW 89th CT
City, State, Zip Code Miami, Florida, 33178
Phone Number (305) 888 - 4611 Fax Number (305) 887 - 3166
Email Address dgurney @ tropicoil.com .

Attach additional sheets if necessary.

2. RESUMES: Provide a resume for each officer, director, member, partner, shareholder, principal, employee, agent, and local representative(s) active in the management of the Applicant, as listed above.

PLEASE COMPLETE THIS APPLICATION AND LABEL ALL REQUIRED BACKUP DOCUMENTATION TO CLEARLY IDENTIFY THE SECTION OF THE APPLICATION TO WHICH THE DOCUMENTATION APPLIES (I.E...., SECTION A, B, C, etc.).

Section A

1. List the name(s) of Applicant's officers, including, CEO, COO, CFO, director(s), member(s), partner(s), shareholder(s), principal(s), employee(s), agents, and local representative(s) active in the management of the Applicant.

Officers:

Title Vice President
First Name James Middle Name _____
Last Name Stapleton
Business Street Address 9970 NW 89th CT
City, State, Zip Code Miami, Florida, 33178
Phone Number (305) 888 - 4611 Fax Number (305) 887 - 3166
Email Address jstapleton @ tropicoil.com .

Title _____
First Name _____ Middle Name _____
Last Name _____
Business Street Address _____
City, State, Zip Code _____
Phone Number (___) _____ Fax Number (___) _____
Email Address _____ @ _____ .

Title _____
First Name _____ Middle Name _____
Last Name _____
Business Street Address _____
City, State, Zip Code _____
Phone Number (___) _____ Fax Number (___) _____
Email Address _____ @ _____ .

Title _____
First Name _____ Middle Name _____
Last Name _____
Business Street Address _____
City, State, Zip Code _____
Phone Number (___) _____ Fax Number (___) _____
Email Address _____ @ _____ .

Attach additional sheets if necessary.

2. RESUMES: Provide a resume for each officer, director, member, partner, shareholder, principal, employee, agent, and local representative(s) active in the management of the Applicant, as listed above.

Section B

1. Place checkmark to describe the Applicant:
   ( ) Sole Proprietorship (X) Corporation ( ) Partnership ( ) Joint Venture ( ) Limited Liability Company

2. Provide copies of the documents filed at the time the Applicant was formed including Articles of Incorporation (if a corporation); Articles of Organization (if an LLC); or Certificate of Limited Partnership or Limited Liability Limited Partnership (if a partnership). If the Applicant was not formed in the State of Florida, provide a copy of the documents demonstrating that the Applicant is authorized to conduct business in the State of Florida. ATTACHED

Section C

1. Has there been any change in the ownership of the Applicant within the last five (5) years? (e.g., any transfer of interest to another party)
   Yes___ No_X_ If "Yes," please provide details in the space provided. Attach additional sheets if necessary.

2. Has there been any name change of the Applicant or has the Applicant operated under a different name within the last five (5) years?
   Yes___ No_X_ If "Yes," please provide details in the space provided, including: Prior name(s) and Date of name change(s) filed with the State of Florida's Division of Corporations or other applicable state agency. Attach additional sheets if necessary.

3. Has there been any change in the officers, directors, executives, partners, shareholders, or members of the Applicant within the past five (5) years?
   Yes_X_ No___ If "Yes," please provide details in the space provided, including:
   Prior officers, directors, executives, partners, shareholders, members
   Name(s) Marlin Everson, Joe Rodriguez, Donald Babb, Roger Mackintosh, Steven Johnson
   New officers, directors, executives, partners, shareholders, members
   Name(s) Carlos Oro, James Stapleton
   Also supply documentation evidencing the changes including resolution or minutes appointing new officers, list of new principals with titles and contact information, and effective date of changes. Attach additional sheets if necessary. ATTACHED

Section D

Provide copies of all fictitious name registrations filed by the Applicant with the State of Florida's Division of Corporations or other State agencies. If none, indicate "None" None.

Section E

1. Has the Applicant acquired another business entity within the last five (5) years?
   Yes___ No X If "Yes," please provide the full legal name of any business entity which the Applicant acquired during the last five (5) years which engaged in a similar business activity as the business activity which is the subject of this Port Everglades Franchise Application.
   If none, indicate "None" None.

2. Indicate in the space provided the date of the acquisition and whether the acquisition was by a stock purchase or asset purchase and whether the Applicant herein is relying on the background and history of the acquired firm's officers, managers, employees and/or the acquired firm's business reputation in the industry to describe the Applicant's experience or previous business history. Attach additional sheets if necessary.

3. Has the Applicant been acquired by another business entity within the last five (5) years?
   Yes___ No X If "Yes," provide the full legal name of any business entity which acquired the Applicant during the last five (5) years which engaged in a similar business activity as the business activity which is the subject of this Port Everglades Franchise Application.
   If none, indicate "None" None.

4. Indicate in the space provided the date of the acquisition and whether the acquisition was by a stock purchase or asset purchase and whether the Applicant herein is relying on the background and history of the parent firm's officers, managers, employees and/or the parent firm's business reputation in the industry to describe the Applicant's experience or previous business history. Attach additional sheets if necessary.

Section F

Provide the Applicant's previous business history, including length of time in the same or similar business activities as planned at Port Everglades.

Section G

1. Provide a list of the Applicant's current managerial employees, including supervisors, superintendents, and forepersons.

2. List the previous work history/experience of the Applicant's current managerial employees, including their active involvement in seaports and length of time in the same or similar business activities as planned at Port Everglades.

Section H

List all seaports, including Port Everglades (if application is for renewal), where the Applicant is currently performing the services/operation which is the subject of this Franchise application. **Use this form for each seaport listed. Photocopy additional pages as needed (one page for each seaport listed).**

If none, state "None" _____.

Seaport Tampa Number of Years Operating at this Seaport 25

List below all of the Applicant's Clients for which it provides services at the seaport listed above.

Client Name (Company)	Number of Years Applicant has Provided Services to this Client
ExxonMobil	57
Shell	10
Royal Caribbean	5

Section H

List all seaports, including Port Everglades (if application is for renewal), where the Applicant is currently performing the services/operation which is the subject of this Franchise application. **Use this form for each seaport listed. Photocopy additional pages as needed (one page for each seaport listed).**

If none, state "None" _____.

Seaport Canaveral Number of Years Operating at this Seaport 20

List below all of the Applicant's Clients for which it provides services at the seaport listed above.

Client Name (Company)	Number of Years Applicant has Provided Services to this Client
Disney Cruise Lines	20
Royal Caribbean	10
World Fuels	10
Toyota Tsusho	10

Section H

List all seaports, including Port Everglades (if application is for renewal), where the Applicant is currently performing the services/operation which is the subject of this Franchise application. **Use this form for each seaport listed. Photocopy additional pages as needed (one page for each seaport listed).**

If none, state "None" _____.

Seaport Miami Number of Years Operating at this Seaport 55

List below all of the Applicant's Clients for which it provides services at the seaport listed above.

Client Name (Company)	Number of Years Applicant has Provided Services to this Client
Celebrity Cruises	20
Norwegian Cruise	10
Royal Caribbean Cruises	20
Seaboard Marine	20
Maersk Group	15
Bernuth Agencies	25
Biscayne Bay Pilots	20
Bunnell Fundation	15
Hyde Shipping	20
Port of Miami Crane	15
US Coast Guard	5

Section H
List all seaports, including Port Everglades (if application is for renewal), where the Applicant is currently performing the services/operation which is the subject of this Franchise application. **Use this form for each seaport listed. Photocopy additional pages as needed (one page for each seaport listed).**

If none, state "None" _____.

Seaport Everglades Number of Years Operating at this Seaport 45

List below all of the Applicant's Clients for which it provides services at the seaport listed above.

Client Name (Company)	Number of Years Applicant has Provided Services to this Client
Crowley	30
Royal Caribbean	20
Carnival Cruises	10
Princess Cruises	10
Holland America	10

Section I

1. Provide a description of all past (within the last five (5) years) and pending litigation and legal claims where the Applicant is a named party, whether in the State of Florida or in another jurisdiction, involving allegations that Applicant has violated or otherwise failed to comply with environmental laws, rules, or regulations or committed a public entity crime as defined by Chapter 287, Florida Statutes, or theft-related crime such as fraud, bribery, smuggling, embezzlement or misappropriation of funds or acts of moral turpitude, meaning conduct or acts that tend to degrade persons in society or ridicule public morals.

The description must include all of the following:
a) The case title and docket number
b) The name and location of the court before which it is pending or was heard
c) The identification of all parties to the litigation
d) General nature of all claims being made
If none, indicate "None" ____None____.

2. Indicate whether in the last five (5) years the Applicant or an officer, director, executive, partner, or a shareholder, employee or agent who is or was (during the time period in which the illegal conduct or activity took place) active in the management of the Applicant was charged, indicted, found guilty or convicted of illegal conduct or activity (with or without an adjudication of guilt) as a result of a jury verdict, nonjury trial, entry of a plea of guilty or nolo contendere where the illegal conduct or activity (1) is considered to be a public entity crime as defined by Chapter 287, Florida Statutes, as amended from time to time, or (2) is customarily considered to be a white-collar crime or theft-related crime such as fraud, smuggling, bribery, embezzlement, or misappropriation of funds, etc. or (3) results in a felony conviction where the crime is directly related to the business activities for which the franchise is sought.

Yes___ No__X

If you responded "Yes," please provide all of the following information for each indictment, charge, or conviction:
a) A description of the case style and docket number
b) The nature of the charge or indictment
c) Date of the charge or indictment
d) Location of the court before which the proceeding is pending or was heard
e) The disposition (e.g., convicted, acquitted, dismissed, etc.)
f) Any sentence imposed
g) Any evidence which the County (in its discretion) may determine that the Applicant and/or person found guilty or convicted of illegal conduct or activity has conducted itself, himself or herself in a manner as to warrant the granting or renewal of the franchise.

Section J ATTACHED

The Applicant must provide a current certificate(s) of insurance. Franchise insurance requirements are determined by Broward County's Risk Management Division and are contained in the Port Everglades Tariff No. 12 as amended, revised or reissued from time to time. The Port Everglades Tariff is contained in the Broward County Administrative Code, Chapter 42, and is available for inspection on line at: http://www.porteverglades.net/development/tariff.

Section K ATTACHED

1. The Applicant must provide its most recent audited or reviewed financial statements prepared in accordance with generally accepted accounting principles, or other documents and information which demonstrate the Applicant's creditworthiness, financial responsibility, and resources, which the Port will consider in evaluating the Applicant's financial responsibility.

2. Has the Applicant or entity acquired by Applicant (discussed in Section E herein) sought relief under any provision of the Federal Bankruptcy Code or under any state insolvency law filed by or against it within the last five (5) year period?
   Yes___ No_X_
   If "Yes," please provide the following information for each bankruptcy or insolvency proceeding:
   a) Date petition was filed or relief sought
   b) Title of case and docket number
   c) Name and address of court or agency
   d) Nature of judgment or relief
   e) Date entered

3. Has any receiver, fiscal agent, trustee, reorganization trustee, or similar officer been appointed in the last five (5) year period by a court for the business or property of the Applicant?
   Yes___ No_X_
   If "Yes," please provide the following information for each appointment:
   a) Name of person appointed
   b) Date appointed
   c) Name and address of court
   d) Reason for appointment

4. Has any receiver, fiscal agent, trustee, reorganization trustee, or similar officer been appointed in the last five (5) year period by a court for any entity, business, or property acquired by the Applicant?
   Yes___ No_X_
   If "Yes," please provide the following information for each appointment:
   a) Name of person appointed
   b) Date appointed
   c) Name and address of court
   d) Reason for appointment

Section L ATTACHED

List four (4) credit references for the Applicant, one of which must be a bank. Use this format:
Name of Reference _____ Nature of Business _____
Contact Name _____ Title _____
Legal Business Street Address _____
City, State, Zip Code _____
Phone Number (___)_____
(Provide on a separate sheet.)

Section M

1. Security: Pursuant to Port Everglades Tariff 12, Item 960, all Franchisees are required to furnish an Indemnity and Payment Bond or Irrevocable Letter of Credit drawn on a U.S. bank in a format and an amount not less than $20,000 as required by Broward County Port Everglades Department.

2. Has the Applicant been denied a bond or letter of credit within the past five (5) years?

   Yes___ No__X__

   If "Yes," please provide a summary explanation in the space provided of why the Applicant was denied. Use additional sheets if necessary.

Section N ATTACHED

1. Provide a list and description of all equipment currently owned and/or leased by the Applicant and intended to be used by the Applicant for the type of service(s) intended to be performed at Port Everglades including the age, type of equipment and model number.

2. Identify the type of fuel used for each piece of equipment.

3. Indicate which equipment, if any, is to be domiciled at Port Everglades.

4. Will all equipment operators be employees of the Applicant, on the payroll of the Applicant, with wages, taxes, benefits, and insurance paid by the Applicant?

   Yes_X_ No___

   If "No," please explain in the space provided who will operate the equipment and pay wages, taxes, benefits, and insurance, if the franchise is granted. Use additional sheets if necessary.

Section O ATTACHED

Provide a copy of the Applicant's current Broward County Business Tax Receipt (formerly Occupational License).

Section P

1. Provide a copy of Applicant's safety program.
2. Provide a copy of Applicant's substance abuse policy.
3. Provide a copy of Applicant's employee job training program/policy.
4. Provide information regarding frequency of training.
5. Include equipment operator certificates, if any.

Section Q

1. Has the Applicant received within the past five (5) years or does the Applicant have pending any citations, notices of violations, warning notices, or fines from any federal, state, or local environmental regulatory agencies?
   Yes___ No_X_

2. Has the Applicant received within the past five (5) years or does the Applicant have pending any citations, notices of violations, warning notices, or civil penalties from the U.S. Coast Guard?
   Yes___ No_X_

3. Has the Applicant received within the past five (5) years or does the Applicant have pending any citations, notices of violations, warning notices, or fines from the Occupational Safety and Health Administration?
   Yes___ No_X_

If you responded "Yes" to any of this section's questions 1, 2, or 3 above, please provide a detailed summary for each question containing the following information:
a) Name and address of the agency issuing the citation or notice
b) Date of the notice
c) Nature of the violation
d) Copies of the infraction notice(s) from the agency
e) Disposition of case
f) Amount of fines, if any
g) Corrective action taken
Attach copies of all citations, notices of violations, warning notices, civil penalties and fines issued by local, state, and federal regulatory agencies, all related correspondence, and proof of payment of fines.

4. Provide a statement (and/or documentation) which describes the Applicant's commitment to environmental protection, environmental maintenance, and environmental enhancement in the Port. ATTACHED

Section R

Provide written evidence of Applicant's ability to promote and develop growth in the business activities, projects or facilities of Port Everglades through its provision of the services (i.e., stevedore, cargo handler or steamship agent) it seeks to perform at Port Everglades. For first-time applicants (stevedore, cargo handler and steamship agent), the written evidence must demonstrate Applicant's ability to attract and retain new business such that, Broward County may determine in its discretion that the franchise is in the best interests of the operation and promotion of the port and harbor facilities. The term "new business" is defined in Chapter 32, Part II of the Broward County Administrative Code as may be amended from time to time.

If you have checked an Applicant box for VESSEL BUNKERING, VESSEL OILY WASTE REMOVAL, VESSEL SANITARY WASTE WATER REMOVAL, OR MARINE TERMINAL SECURITY, then the following additional information is required:

[X] **VESSEL BUNKERING**

Section T- A Letter of Adequacy from the U.S. Coast Guard and a copy of the applicant's operations manual approved by the U.S. Coast Guard.
Section V- A copy of the applicant's Oil Spill Contingency Plan for Marine Transportation Related Facilities approved by the U.S. Coast Guard.
Section W- A Terminal Facility Discharge Prevention and Response Certificate with a copy of an approved Oil Spill Contingency Plan from the Florida Dept. of Environmental Protection.
Section Z- An approved Discharge Cleanup Organization Certificate from the Florida Dept. of Environmental Protection which has been issued to the applicant or to its cleanup contractor with a copy of the cleanup contract showing the expiration date.

[ ] **VESSEL OILY WASTE REMOVAL**

Section S - Certificate of Adequacy in compliance with the Directives of MARPOL 73/75 and 33 CFR 158, if applicable.
Section T- A Letter of Adequacy from the U.S. Coast Guard and a copy of the Applicant's operations manual approved by the U.S. Coast Guard.
Section U- A Waste Transporter License from the Broward County Environmental Protection Department identifying the nature of the discarded hazardous (or non-hazardous) material to be transported.
Section V- A copy of the Applicant's Oil Spill Contingency Plan for Marine Transportation Related Facilities approved by the U.S. Coast Guard.
Section W- A Terminal Facility Discharge Prevention and Response Certificate with a copy of an approved Oil Spill Contingency Plan from the Florida Dept. of Environmental Protection.
Section X- A Used Oil Collector, Transporter, and Recycler Certificate from the Florida Dept. of Environmental Protection.
Section Y- An Identification Certificate from the U.S. Environmental Protection Agency.
Section Z- An approved Discharge Cleanup Organization Certificate from the Florida Dept. of Environmental Protection which has been issued to the Applicant or to its cleanup contractor with a copy of the cleanup contract showing the expiration date.

[ ] **VESSEL SANITARY WASTE WATER REMOVAL**

Section U- A Waste Transporter License from the Broward County Environmental Protection Department identifying the nature of the discarded hazardous (or non-hazardous) material to be transported.
Section Z1- A copy of the Applicant's operations manual.
Section Z2- A Septage Receiving Facility Waste Hauler Discharge Permit from the Broward County Water and Wastewater Services Operations Division.

[ ] **MARINE TERMINAL SECURITY**

Section N1- A list of all metal detection devices, walk-through and hand held, as well as all luggage and carryon x-ray machines owned or leased, to be used or domiciled at Port Everglades. Listing must include brand name and model.
Section N2- A copy of all manufacturers recommended service intervals and name of company contracted to provide such services on all aforementioned equipment.
Section N3- A description of current method employed to assure all equipment is properly calibrated and functioning.
Section N4- current training requirements and training syllabus for employees operating

x-ray equipment. Highlight emphasis on weapon and contraband identification.
Include equipment operator certificates, if any.

Section O1- Provide copies of all local, state and federal licenses, including:

a. A copy of the Applicant's State of Florida Business License.

b. A copy of security agency's Manager's "M" or "MB" License and a copy of the security agency's "B" or "BB" License issued by the Florida Department of Agriculture and Consumer Services.

Section P3- SECURITY GUARDS / SUPERVISORS

a. Provide Applicant's background requirements, education, training etc., for personnel hired as security guards.

b. Provide historic annual turnover ratio for security guards.

c. Provide a copy of Applicant's job training program/policy including a copy of training curriculum and copies of all manuals and take-home materials made available to security guards. Include information regarding frequency of training.

d. Provide background requirements, experience, licensing and any and all advanced training provided to supervisory personnel.

e. Provide present policy for individual communication devices either required of security guards or supplied by the employer.

f. Provide procurement criteria and source as well as Applicant's certification requirements for K-9 workforce.

g. Provide information on the number of security guards / supervisors currently employed or expected to be employed to provide security services at Port Everglades.

Supervisors _____
Class D Guards_____
Class G Guards_____
K-9 Handlers _____

Port Everglades Tariff 12

References to the Port Everglades Tariff 12 as amended or reissued: http://www.porteverglades.net/development/tariff

Application Fees

The following fees have been established for franchised businesses at Port Everglades. Initial processing fees are nonrefundable. A franchise is required for each category of business.

Stevedore
Initial processing fee, assignment fee, or reinstatement fee $ 11,000.00
Annual Fee
$ 4,000.00

Cargo Handler
Initial processing fee, assignment fee, or reinstatement fee $ 11,000.00
Annual Fee
$ 4,000.00

Steamship Agent
Initial processing fee, assignment fee, or reinstatement fee $ 4,000.00
Annual Fee
$ 2,250.00

Tugboat and Towing
Initial processing fee, assignment fee, or reinstatement fee $ 26,000.00
Annual Fee
By Contract

Vessel Bunkering, Vessel Oily Waste Removal, Vessel Sanitary Waste Water Removal
Initial processing fee, assignment fee, or reinstatement fee $ 4,000.00
Annual Fee
$ 2,250.00

For first-time franchise Applicants, both the initial application fee and the annual fee must be submitted at time of application. Thereafter, annual franchise fees are due and payable each year on the franchise anniversary date, which is defined as the effective date of the franchise.

Note: Check(s) should be made payable to:
BROWARD COUNTY BOARD OF COUNTY COMMISSIONERS and be mailed with this application to:
Port Everglades Business Administration Division
1850 Eller Drive, Fort Lauderdale, FL 33316

Required Public Hearing

Staff review of this application will not commence until such time as all of the above requested information and documentation has been provided and the franchise application has been determined by staff to be complete. All of the above requested information and Sections are required to be completed prior to the scheduling of the public hearing. Staff will request that the Broward County Board of County Commissioners set a public hearing to consider the franchise application and hear comments from the public. The Applicant will be notified of the Public Hearing date and must plan to attend the Public Hearing.

By signing and submitting this application, Applicant certifies that all information provided in this application is true and correct. Applicant understands that providing false or misleading information on this application may result in the franchise application being denied, or in instances of renewal, a franchise revoked. Applicant hereby waives any and all claims for any damages resulting to the Applicant from any disclosure or publication in any manner of any material or information acquired by Broward County during the franchise application process or during any inquiries, investigations, or public hearings.

Applicant further understands that if there are any changes to the information provided herein (subsequent to this application submission) or to its officers, directors, senior management personnel, or business operation as stated in this application, Applicant agrees to provide such updated information to the Port Everglades Department of Broward County, including the furnishing of the names, addresses (and other information as required above) with respect to persons becoming associated with Applicant after its franchise application is submitted, and any other required documentation requested by Port Everglades Department staff as relating to the changes in the business operation. This information must be submitted within ten (10) calendar days from the date of any change made by the Applicant.

Applicant certifies that all workers performing functions for Applicant who are subject to the Longshore and Harbor Workers' Act are covered by Longshore & Harbor Workers' Act, Jones Act Insurance, as required by federal law.

This application and all related records are subject to Chapter 119, F.S., the Florida Public Records Act.

By its execution of this application, Applicant acknowledges that it has read and understands the rules, regulations, terms and conditions of the franchise it is applying for as set forth in Chapter 32, Part II, of the Broward County Administrative Code as amended, and agrees, should the franchise be granted by Broward County, to be legally bound and governed by all such rules, regulations, terms and conditions of the franchise as set forth in Chapter 32, Part II, of the Broward County Administrative Code as amended.

The individual executing this application on behalf of the Applicant, personally warrants that s/he has the full legal authority to execute this application and legally bind the Applicant

Signature of Applicant's Authorized Representative _____ Date Signed 8/21/18

Signature name and title - typed or printed Stephen Gorey - President

Witness Signature (*Required*) _____

Witness name-typed or printed David Gurney

Witness Signature (*Required*) _____

Witness name-typed or printed Osvaldo Roche

If a franchise is granted, all official notices/correspondence should be sent to:

Name Osvaldo Roche Title Plant Manager

Address 9970 NW 89th CT, Miami, Florida, 33178 Phone (305) 888 - 4611

TROPIC OIL COMPANY

Mobil

George E. LeVasser

C.E.O.

July 31, 2018

Resume

George E. LeVasser

Education:

- High School graduate in Miami, Florida
- Graduated of University of Florida, Bachelor of Science degree in Pharmacy.

Employment:

- Employed with Drug Fair as Pharmacist from 1968 - 1973
- Tropic Oil Company 1973 and is currently Chief Executive Officer.

9970 NW 89th Court | Medley, FL 33178 | O: 305.888.4611 | Fx: 305.887.9428 | TF: 866.645.3835
www.tropicoil.com

TROPIC OIL COMPANY

Mobil™

Stephen Gorey

President.

July 31, 2018

Resume

Stephen Gorey

Education:

- Graduated Troy State University 1990 with Bachelor's Degree in Business Management.

Employment:

- Tropic Oil Company 1990 as warehouseman, truck driver, sales representative and currently President.

9970 NW 89th Court | Medley, FL 33178 | O: 305.888.4611 | Fx: 305.887.9428 | TF: 866.645.3835
www.tropicoil.com

TROPIC OIL COMPANY

Mobil™

Carlos Oro

Chief Financial Officer

July 31, 2018

Resume

Carlos Oro

Education:

- High School graduate in Orlando, Florida
- Graduate University of Central Florida, Bachelor of Science degree in Accounting

Employment:

- IBM, Finance Business Consultant 2005-2012
- Datawatch Corporation, Financial Applications and Product Management 2012-2017
- Tropic Oil Company 2017 to present – Chief Financial Officer

9970 NW 89th Court | Medley, FL 33178 | O: 305.888.4611 | Fx: 305.887.9428 | TF: 866.645.3835
www.tropicoil.com

TROPIC OIL COMPANY

Mobil™

David H. Gurney

Vice President

July 31, 2018

Resume

David H. Gurney

Education:

- BA/BS California Polytechnic University, San Luis Obispo; 1980
- MS USAF School of Advanced Air and Space Studies, Air University; 1997
- MS Eisenhower School for National Security and Resource Strategy; 2003

Employment:

- US Marine Corps: 1980 – 2006; Marine Officer, 2nd Lieutenant – Colonel.
- National Defense University: 2006 – 2010: Senior Research Fellow, Institute for National Strategic Studies; Director, National Defense University Press; Editor Joint Force Quarterly national security journal for Chairman, Joint Chiefs of Staff.
- Tropic Oil Company: 2010 – Present. Vice President of Operations.

TROPIC OIL COMPANY

Mobil

James M Stapleton

Brief Bio

Education:

High School Graduate: Glynn Academy High School, Brunswick, Ga
College Graduate: United States Merchant Marine Academy, Kings Point, NY
Bachelor of Science in Marine Transportation

Work History:

3rd Mate (Cargo and Navigation Officer) American Maritime Officers Union
Del Monte Fresh Produce/Network Shipping
Dolphin Chemical
Innospec Fuel Specialties
Tropic Oil: Currently serving as Vice President, Sales

TROPIC OIL COMPANY

Mobil™

Osvaldo Roche

Plant Manager

July 31, 2018

Resume

Osvaldo Roche

Education:

- High School graduate in Havana, Cuba

Employment:

- Tropic Oil Company 2001 as truck driver, dispatch and currently Plant Manager.

State of Florida

Department of State

I certify the attached is a true and correct copy of the Articles of Incorporation, as amended to date, of TROPIC OIL COMPANY, a corporation organized under the laws of the State of Florida, as shown by the records of this office.

The document number of this corporation is 167934.

Given under my hand and the
Great Seal of the State of Florida
at Tallahassee, the Capitol, this the
Fifteenth day of November, 2007

Kurt S. Browning
Secretary of State

CR2EO22 (01-07)

WRITTEN CONSENT IN LIEU OF SPECIAL JOINT MEETING OF SHAREHOLDERS AND DIRECTORS OF TROPIC OIL COMPANY

The undersigned being all of the Shareholders and Directors of TROPIC OIL COMPANY, a Florida Corporation (the "Corporation"), hereby adopt the following resolutions by Written Consent in lieu of a special meeting of the Shareholders and Board of Directors:

BE IT RESOLVED: That the Annual Report of the President, as submitted, be approved.

BE IT FURTHER RESOLVED: That the Annual Report of the Treasurer, as submitted, be approved.

BE IT FURTHER RESOLVED: That all of the actions of the Directors and Officers of the Corporation undertaken in the conduct of the affairs of the Corporation since the last meetings of the Shareholders and the Board of Directors be, and in all respects they hereby are, approved, ratified and confirmed as of the dates taken or done respectively.

BE IT FURTHER RESOLVED: That the following individuals are hereby elected as Directors until the next annual meeting:

George E. LeVasser
Stephen J. Gorey

BE IT FURTHER RESOLVED: That the following individuals are hereby elected as Officers until the next annual meeting:

George E. LeVasser – Chief Executive Officer
Stephen J. Gorey – President
James Stapleton – Vice President (Sales)
David H. Gurney – Vice President (Operations)
Carlos Oro – Chief Financial Officer, Treasurer, Secretary

IN WITNESS WHEREOF, the undersigned Shareholders and Directors of TROPIC OIL COMPANY each execute this written consent as of the 1st day of January, 2018.

George E. LeVasser, Shareholder/Director

Stephen J. Gorey, Shareholder/Director

From: Ryan Meade
To: Osorno-Belleme, Angela
Cc: Osvaldo F. Roche
Subject: Additional information for Tropic Oil Company Application
Date: Thursday, September 27, 2018 1:21:30 PM
Attachments: image001.png

Good afternoon it was great talking to you Angela,

I spoke to Osvaldo and I told me has sent you some of the items we discussed on the phone, the additional required info is below:

Business History:
Tropic Oil Company was founded in 1952

- Wholesaler / Distributor of fuel and lubricants
- Licensed ExxonMobil and Shell Marine Distributorship
- Fuel supplier for many of the cruise line vessels at PE to included: Royal Caribbean, Carnival Cruise Lines, Norwegian

Managerial Employees that do business in PE:
President: Stephen Gorey
Vice President of Operations: David Gurney
Vice President of Sales: James Stapleton
Director of Marine Department: Matt Davis
Plant Manager: Osvaldo Roche
Lead Dispatcher: Jose Crespo
All of our Drivers

If there are any other questions that you need info for the application please let me know, thank you and have a wonderful day.

TROPIC OIL COMPANY
I visit our website I

Ryan Meade I Tropic Oil
Executive Manager
9970 NW 89th Court Miami, FL 33178
O: 305.888.4611 F: 305.887.3166
TF: 866.645.3835 C: 786.527.1359
Mobil Distributor

ACORD®

CERTIFICATE OF LIABILITY INSURANCE

DATE (MM/DD/YYYY) 8/6/2018

THIS CERTIFICATE IS ISSUED AS A MATTER OF INFORMATION ONLY AND CONFERS NO RIGHTS UPON THE CERTIFICATE HOLDER. THIS CERTIFICATE DOES NOT AFFIRMATIVELY OR NEGATIVELY AMEND, EXTEND OR ALTER THE COVERAGE AFFORDED BY THE POLICIES BELOW. THIS CERTIFICATE OF INSURANCE DOES NOT CONSTITUTE A CONTRACT BETWEEN THE ISSUING INSURER(S), AUTHORIZED REPRESENTATIVE OR PRODUCER, AND THE CERTIFICATE HOLDER.

IMPORTANT: If the certificate holder is an ADDITIONAL INSURED, the policy(ies) must be endorsed. If SUBROGATION IS WAIVED, subject to the terms and conditions of the policy, certain policies may require an endorsement. A statement on this certificate does not confer rights to the certificate holder in lieu of such endorsement(s).

PRODUCER Gulfshore Insurance, Inc. 4100 Goodlette Rd N Naples FL 34103-3303	**CONTACT NAME:** Karla Castro **PHONE (A/C, No, Ext):** 239 263-4527 **FAX (A/C, No):** 239 213-2803 **E-MAIL ADDRESS:** kcastro@gulfshoreinsurance.com
INSURED TROOI Tropic Oil Company Tropic Transportation LLC 10002 NW 89th Ave Miami FL 33178	**INSURER(S) AFFORDING COVERAGE** — **NAIC #** **INSURER A :** HDI Global Insurance Company **INSURER B :** Amerisure Insurance Company **INSURER C :** Landmark American Insurance Company **INSURER D :** **INSURER E :** **INSURER F :**

COVERAGES **CERTIFICATE NUMBER:** 1672950505 **REVISION NUMBER:**

THIS IS TO CERTIFY THAT THE POLICIES OF INSURANCE LISTED BELOW HAVE BEEN ISSUED TO THE INSURED NAMED ABOVE FOR THE POLICY PERIOD INDICATED. NOTWITHSTANDING ANY REQUIREMENT, TERM OR CONDITION OF ANY CONTRACT OR OTHER DOCUMENT WITH RESPECT TO WHICH THIS CERTIFICATE MAY BE ISSUED OR MAY PERTAIN, THE INSURANCE AFFORDED BY THE POLICIES DESCRIBED HEREIN IS SUBJECT TO ALL THE TERMS, EXCLUSIONS AND CONDITIONS OF SUCH POLICIES. LIMITS SHOWN MAY HAVE BEEN REDUCED BY PAID CLAIMS.

INSR LTR	TYPE OF INSURANCE	ADDL INSR	SUBR WVD	POLICY NUMBER	POLICY EFF (MM/DD/YYYY)	POLICY EXP (MM/DD/YYYY)	LIMITS	
A	**GENERAL LIABILITY** X COMMERCIAL GENERAL LIABILITY CLAIMS-MADE X OCCUR GEN'L AGGREGATE LIMIT APPLIES PER: X POLICY PRO-JECT LOC	Y	Y	EGGCD000012517	1/1/2017	10/1/2018	EACH OCCURRENCE DAMAGE TO RENTED PREMISES (Ea occurrence) MED EXP (Any one person) PERSONAL & ADV INJURY GENERAL AGGREGATE PRODUCTS - COMP/OP AGG $	$ 2,000,000 $ 100,000 $ 0 $ 2,000,000 $ 2,000,000 $ 2,000,000 $
A	**AUTOMOBILE LIABILITY** X ANY AUTO ALL OWNED AUTOS SCHEDULED AUTOS X HIRED AUTOS X NON-OWNED AUTOS X MCS-90 X Pollution Li	Y	Y	EAGCD000012517	1/1/2017	10/1/2018	COMBINED SINGLE LIMIT (Ea accident) BODILY INJURY (Per person) BODILY INJURY (Per accident) PROPERTY DAMAGE (Per accident) $	$ 2,000,000 $ $ $ $
A	**UMBRELLA LIAB** X OCCUR X **EXCESS LIAB** CLAIMS-MADE DED X RETENTION $ 0			EXAGD000012517	1/1/2017	10/1/2018	EACH OCCURRENCE AGGREGATE $	$ 3,000,000 $ 3,000,000 $
B	**WORKERS COMPENSATION AND EMPLOYERS' LIABILITY** Y / N ANY PROPRIETOR/PARTNER/EXECUTIVE OFFICER/MEMBER EXCLUDED? N **(Mandatory in NH)** If yes, describe under DESCRIPTION OF OPERATIONS below	N / A	Y	WC208014707	1/1/2018	1/1/2019	X WC STATU-TORY LIMITS OTH-ER E.L. EACH ACCIDENT E.L. DISEASE - EA EMPLOYEE E.L. DISEASE - POLICY LIMIT	 $ 1,000,000 $ 1,000,000 $ 1,000,000
C	Excess Liability 2nd Layer			LHA077956	1/1/2017	10/1/2018	Each Occurrence Aggregate	$8,000,000 $8,000,000

DESCRIPTION OF OPERATIONS / LOCATIONS / VEHICLES (Attach ACORD 101, Additional Remarks Schedule, if more space is required)

Certificate Holder is included as Additional Insured on a primary and noncontributory basis with respects to General Liability per form ENAIPNC 0411; completed operations per form CG2037 0413 and ongoing operations per form CG2010 0413 only as required by written contract, Waiver of Subrogation per form CG2404 0509. Additional Insured in regards to the Auto Liability on a primary and noncontributory basis per form ENCAAIPNC 0911 and Waiver of Subrogation per FLCA0444 0312 only as required by written contract. Waiver of subrogation in regards to the Workers Compensation only as required by written contract per form WC000313 0484.

CERTIFICATE HOLDER

BROWARD COUNTY BOARD OF COUNTY COMMISIONERS PORT EVERGLADES DEPT
1850 ELLER DRIVE
FORT LAUDERDALE FL 33316

CANCELLATION

SHOULD ANY OF THE ABOVE DESCRIBED POLICIES BE CANCELLED BEFORE THE EXPIRATION DATE THEREOF, NOTICE WILL BE DELIVERED IN ACCORDANCE WITH THE POLICY PROVISIONS.

AUTHORIZED REPRESENTATIVE

Timothy A. Spear

HLB Gravier, LLP
Certified Public Accountants

TROPIC OIL COMPANY AND
TROPIC TRANSPORTATION, LLC

COMBINED FINANCIAL STATEMENTS AND
INDEPENDENT ACCOUNTANTS' REVIEW REPORT

DECEMBER 31, 2017 and 2016

TABLE OF CONTENTS

HLB GRAVIER, LLP
CERTIFIED PUBLIC ACCOUNTANTS

INDEPENDENT ACCOUNTANTS' REVIEW REPORT

To the Shareholders of
Tropic Oil Company and Tropic Transportation, LLC
Miami, Florida

We have reviewed the accompanying combined financial statements of Tropic Oil Company and Tropic Transportation, LLC, which comprise the combined balance sheets as of December 31, 2017 and 2016, and the related combined statements of income and retained earnings and cash flows for the years then ended and the related notes to the combined financial statements. A review includes primarily applying analytical procedures to management's financial data and making inquiries of company management. A review is substantially less in scope than an audit, the objective of which is the expression of an opinion regarding the combined financial statements taken as a whole. Accordingly, we do not express such an opinion.

Management's Responsibility for the Financial Statements
Management is responsible for the preparation and fair presentation of these combined financial statements in accordance with accounting principles generally accepted in the United States of America; this includes the design, implementation, and maintenance of internal control relevant to the preparation and fair presentation of the combined financial statements that are free from material misstatement whether due to error or fraud.

Accountant's Responsibility
Our responsibility is to conduct the review engagements in accordance with Statements on Standards for Accounting and Review Services promulgated by the Accounting and Review Services Committee of the AICPA. Those standards require us to perform procedures to obtain limited assurance as a basis for reporting whether we are aware of any material modifications that should be made to the combined financial statements for them to be in accordance with accounting principles generally accepted in the United States of America. We believe that the results of our procedures provide a reasonable basis for our conclusion.

Accountant's Conclusion

Based on our reviews, we are not aware of any material modifications that should be made to the accompanying combined financial statements in order for them to be in accordance with accounting principles generally accepted in the United States of America.

HLB Gravier, LLP
CERTIFIED PUBLIC ACCOUNTANTS

Coral Gables, Florida
March 19, 2018

Tropic Oil Company and Tropic Transportation, LLC
COMBINED BALANCE SHEET
(Read Independent Accountants' Review Report)

Assets

	December 31, 2017	December 31, 2016
Current assets:		
Cash	$ 203,618	$ 45,053
Accounts Receivable, net	19,289,116	13,193,985
Other Receivables	283,548	181,540
Inventories	8,525,101	8,520,763
Prepaid Expenses	166,367	415,630
Total current assets	28,467,750	22,356,971
Property and equipment, net	5,656,605	2,009,232
Goodwill, net	487,500	562,500
Other Assets	72,260	208,392
	$ 34,684,115	$ 25,137,095

Liabilities and Stockholders Equity/Members Capital

Current liabilities:		
Accounts payable and accrued expenses	$ 10,230,375	$ 6,814,683
Lines of credit and current portion of note payable	9,285,484	5,978,394
Note payable stock purchase agreement - current	218,919	210,481
Current portion of capital lease obligation	231,399	-
Intercompany payable to related entity	-	84,671
Distribution payable to stockholders	654,653	730,150
Total Current Liabilities	20,620,830	13,818,379
Note Payable, long-term portion	81,306	164,648
Long-term capital lease obligation	2,514,511	-
Note Payable, stock purchase agreement	227,695	446,615
Total Liabilities	23,444,342	14,429,642
Stockholders equity/members capital:		
Common stock	5,716	5,716
Members capital	1,500,000	1,500,000
Treasury stock	(2,400,000)	(2,400,000)
Retained earnings	12,134,057	11,601,737
Total stockholders equity/members capital	11,239,773	10,707,453
	$ 34,684,115	$ 25,137,095

The accompanying notes are an integral part of these combined financial statements.

Tropic Oil Company and Tropic Transportation, LLC
COMBINED STATEMENT OF INCOME AND RETAINED EARNINGS
(Read Independent Accountants' Review Report)

	For the Years Ended December 31, 2017	2016
Net sales	$ 202,335,927	$ 151,496,728
Cost of sales	185,024,669	136,217,632
Gross margin	17,311,258	15,279,096
Operating expenses:		
Selling, general and administrative	14,400,775	12,648,323
Interest expense	236,491	149,036
Depreciation and amortization	706,874	610,367
	15,344,140	13,407,726
Income from operations	1,967,118	1,871,370
Other income (expense):		
Gain (loss) on disposition of property and equipment	105,718	5,000
Other expenses, net	(47)	72,046
	105,671	77,046
Net income	2,072,789	1,948,416
Retained earnings, beginning	11,601,737	10,938,790
Distributions	(1,540,469)	(1,285,469)
Retained earnings, end	$ 12,134,057	$ 11,601,737

The accompanying notes are an integral part of these combined financial statements.

Tropic Oil Company and Tropic Transportation, LLC
COMBINED STATEMENT OF CASH FLOWS
(Read Independent Accountants' Review Report)

Cash flows from operating activities:	For the Years Ended December 31, 2017	2016
Net income	$ 2,072,789	$ 1,948,416
Adjustments to reconcile net income to net cash provided by operating activities:		
Depreciation and amortization	706,874	610,367
Gain on sale of property and equipment	(105,718)	(5,000)
Provision for bad debts	55,000	-
Net change in assets and liabilities:		
(Increase) decrease in accounts receivable	(6,150,131)	(5,350,916)
(Increase) decrease in other receivables	(102,008)	(6,734)
(Increase) decrease in inventory	(4,338)	681,433
(Increase) decrease in prepaids and other assets	275,085	(56,912)
(Increase) decrease in intercompany receivable	(84,671)	267,660
Increase (decrease) in accounts payable and accrued expenses	3,415,692	2,355,195
Net cash provided by operating activities	78,574	443,509
Cash flows from investing activities:		
Purchase of property and equipment	(1,477,452)	(139,953)
Proceeds from sale of property and equipment	228,291	5,000
Net cash used in investing activities	(1,249,161)	(134,953)
Cash flows from financing activities:		
Change in line of credit	3,386,569	905,589
Repayment of term-loans	(162,821)	(170,391)
Payments under capital leases	(68,148)	-
Repayments under stock purchase agreement	(210,482)	(202,368)
Distributions	(1,615,966)	(1,059,260)
Net cash provided by financing activities	1,329,152	(526,430)
Net increase in cash during the year	158,565	(217,874)
Cash at the beginning of the year	45,053	262,927
Cash at the end of the year	$ 203,618	$ 45,053

The accompanying notes are an integral part of these combined financial statements.

TROPIC OIL COMPANY AND TROPIC TRANSPORTATION, LLC
NOTES TO COMBINED FINANCIAL STATEMENTS
(Read Independent Accountants' Review Report)
December 31, 2017 and 2016

NOTE 1 - SUMMARY OF SIGNIFICANT ACCOUNTING POLICIES

Nature of Business
Tropic Oil Company is primarily engaged in the wholesale and retail distribution of petroleum products and ancillary items. It has marine lubricant distributor agreements with ExxonMobil and Shell Oil, as well as general lubricant distributor agreements with ExxonMobil, and ConocoPhillips. These contracts establish a marketing area of all of Florida, south of Orlando.

Tropic Oil Company also operates seven unmanned commercial fueling sites (d/b/a Tropic Fleet Services) as a Pacific Pride franchisee (Pacific Pride has approximately 4,000,000 card holders). It also purchases fuel on the spot market for resale to marine and commercial customers.

Tropic Transportation, LLC is primarily engaged in the holding, maintenance and management of a fleet of trucks and truck drivers for Tropic Oil Company.

These financial statements combine the accounts of both entities referred to above (collectively referred to as "the Company") because they are controlled by the same individuals. All significant inter-company transactions have been eliminated.

Revenue Recognition
The Company generally recognizes revenues upon shipment to customers or at the time that services are provided and revenues are earned.

Statement of Cash Flows
Interest and financing expenses paid for the years ending December 31, 2017 and 2016 were $238,291 and $156,383, respectively.

Trade Accounts Receivable
Trade accounts receivable are stated at the amount the Company expects to collect. The Company maintains allowances for doubtful accounts for estimated losses resulting from the inability of its customers to make required payments. Management considers the following factors when determining the collectibles of specific customer accounts: customer credit-worthiness, past transaction history with the customer, current economic industry trends, and changes in customer payment terms. If the financial condition of the Company's customers were to deteriorate, adversely affecting their ability to make payments, additional allowances would be required. Based on management's assessment, the Company provides for estimated uncollectible amounts through a charge to earnings and a credit to a valuation allowance. Balances that remain outstanding after the Company has used reasonable collection efforts are written off through a charge to the valuation allowance and a credit to accounts receivable. A majority of the Company's customers are located in the South Florida area. The Company's accounts receivable are generally not collateralized. The allowance for doubtful accounts at December 31, 2017 and 2016 is $485,623 and $512,588, respectively.

Inventories
Inventory, consisting of lubricants, petroleum specialties, gasoline and diesel fuels, is stated at the lower of cost (average cost) or market.

NOTE 1 - SUMMARY OF SIGNIFICANT ACCOUNTING POLICIES (Continued)

Property and Equipment

Property and equipment is recorded at cost and depreciated over its estimated useful life using the straight-line method. The cost of major additions and improvements is capitalized and the cost of maintenance and repairs which do not extend the life of the asset is charged to expense in the period. Upon sale or retirement, the asset and related accumulated depreciation are removed from the accounts and any resulting gain or loss is reflected in income.

Goodwill

During 2014, Tropic Transportation, LLC acquired a business segment from an unrelated entity that included a fleet of trucks and drivers. In this transaction, goodwill was recognized as the excess of the cost of the acquisition over the fair value of the net identifiable assets acquired at the date of acquisition. In accordance with the provisions set forth in ASU 2014-02, Intangibles – Goodwill, Tropic Transportation, LLC elected to amortize goodwill over a 10-year period. Subsequent testing of goodwill impairment is required when a triggering event occurs indicating the fair value of the entity may be below its carrying value. If required, goodwill would be tested using a two-step process: the first step is to identify if a potential impairment exists, while the second step of the goodwill impairment test measures the amount of the impairment loss, if any. A review was not performed as of December 31, 2017 as there was no triggering event. Accumulated goodwill amortization as of December 31, 2017 and 2016 was $262,500 and $187,500, respectively.

Impairment of Long-Lived Assets

The Company assesses whether there has been impairment in the value of its long-lived assets whenever events or changes in circumstances indicate the carrying amount of an asset may not be recoverable. Recoverability of assets to be held and used is measured by a comparison of the carrying amount of an asset to future net cash flows expected to be generated by the asset. If such assets are considered to be impaired, the amount of impairment to be recognized is measured by the amount by which the carrying amount of the asset exceeds the estimated fair value of the asset.

Income Taxes

The Company is not subject to income taxes, as it has elected to be taxed as an S Corporation under Internal Revenue Code provisions, whereby the stockholders are liable for individual taxes on the taxable income of the Company. Tax years that remain subject to a U.S. Federal Income tax examination are 2013 through 2017. The Company is not subject to state income tax in any jurisdiction. There are no interest and penalties recognized in the statement of operations.

The Company has adopted *"Accounting for Uncertainties in Income Taxes"* as prescribed by the *Accounting Standards Codification,* which provides guidance for financial statement recognition and measurement of uncertain tax positions taken or expected to be taken in a tax return for open tax years (generally a period of three years from the later of each return's due date or the date filed) that remain subject to examination by the Company's major tax jurisdictions. Under that guidance the Company assesses the likelihood, based on technical merit, that tax positions will be sustained upon examination based on the facts, circumstances and information available at the end of the each period. Adoption had no effect on the Company's financial statements.

NOTE 1 - SUMMARY OF SIGNIFICANT ACCOUNTING POLICIES (Continued)

Use of Estimates
The preparation of financial statements in conformity with accounting principles generally accepted in the United States of America requires management to make estimates and assumptions that affect the reported amounts of assets and liabilities and disclosure of contingent assets and liabilities at the dates of the financial statements and the reported amount of revenues and expenses during the reporting period. Actual results could differ from estimates.

Capital Leases
Leases that transfer substantially all of the benefits and risks of ownership to the Company are accounted for as the acquisition of assets and assumption of obligations (see Note 5). Accordingly, capitalized lease assets are recorded as property and equipment and the present value of the minimum lease payments are recorded as capital lease obligations. Amortization expense is computed using the straight-line method over the shorter of the estimated useful lives of the assets or the period of the related lease.

Subsequent Events
In accordance with ASC 855, the Company has evaluated subsequent events and transactions for potential recognition or disclosure through March 19, 2018, which is the date the financial statements were available to be issued.

NOTE 2 – DEPOSIT POLICY AND CREDIT RISK

It is Tropic Oil's policy to maintain its cash and cash equivalents in major banks and in high grade investments. As of December 31, 2017, the carrying amount of total deposits was $203,618 and the respective bank balances totaled $178,804.

The Company maintains its cash in bank deposit accounts which, at times, may exceed federally insured limits. The balances are insured by the Federal Deposit Insurance Corporation (FDIC) up to $250,000. At December 31, 2017, the Company had no balances in excess of insured limits.

NOTE 3 – ACCOUNTS RECEIVABLE

Accounts receivable at December 31, 2017 consists of the following:

Trade accounts receivable	$19,774,739
Less allowance for doubtful accounts	(485,623)
Accounts receivable, net	$19,289,116

Accounts receivables allowances include allowance for doubtful accounts. The activity in the allowance account for the year ended December 31, 2017 is as follows:

Allowance at beginning of the year	$(512,588)
Write-offs during the year	81,965
Current year allowances	(55,000)
Allowance at end of the year	$(485,623)

TROPIC OIL COMPANY AND TROPIC TRANSPORTATION, LLC
NOTES TO COMBINED FINANCIAL STATEMENTS
(Read Independent Accountants' Review Report)
December 31, 2017 and 2016

NOTE 4 - PROPERTY AND EQUIPMENT

	2017	2016	Estimated Useful Life
Non-depreciable assets:			
Land	$711,596	$711,596	
Transportation equipment	417,560	-	
Depreciable assets:			
Vehicles	4,182,919	4,174,061	5-7 years
Vehicles under capital lease	2,814,058	-	5 years
Building and improvements	1,007,370	1,007,370	15 years
Cardlock fueling sites	1,368,736	1,391,801	15 years
Storage tanks	1,115,310	962,610	10 years
Office furniture and equipment	463,429	234,942	5-7 years
Warehouse equipment	460,260	388,829	5 years
	12,541,238	8,871,209	
Accumulated depreciation	(6,884,633)	(6,861,977)	
	$5,656,605	$2,009,232	

NOTE 5 – CAPITAL LEASES – FUTURE MINIMUM LEASE PAYMENTS

The Company leases certain of its vehicles under agreements that are classified as capital leases. The cost of vehicles under capital leases is included in the balance sheet as property and equipment and was $2,814,058 and zero at December 31, 2017 and 2016, respectively. Accumulated amortization of the leased vehicles at December 31, 2017 and 2016 was $39,819 and zero, respectively. Amortization of capital leases is included in depreciation expense.

The future minimum lease payments required under the capital leases and the present value of the net minimum lease payments as of December 31, 2017, are as follows:

	Year Ending December 31	Cost
	2018	$482,848
	2019	482,848
	2020	482,848
	2021	482,848
	2022	1,638,373
Total minimum lease payments		3,569,765
Less: Amount representing interest		(823,855)
Present value of net minimum lease payments		2,745,910
Less: Current maturities of capital leases		(231,399)
Long-term capital lease obligations		$2,514,511

NOTE 6 - RELATED PARTY TRANSACTIONS AND GUARANTEES

In 2010, the Company entered into a Stock Purchase Agreement with a shareholder for the acquisition of the shareholder's outstanding shares for $2,400,000. Pursuant to the terms of the agreement, the Company made a payment of $480,000 on the closing date and entered into a promissory note with the shareholder for the remainder of $1,920,000 (See Note 8). The Company will continue to make payments under the agreement through 2019.

The Company is a guarantor on a $6,000,000 term loan to Tropic Real Property Holding, LLC, a company owned by the shareholders of Tropic Oil Company and Tropic Transportation, LLC. The term loan is secured by a warehouse and office facility that is leased to the Company and other unrelated tenants. Rent paid to the affiliate during 2017 was $365,940.

The Company is a guarantor on a $1,200,000 term loan to Tropic Cocoa, LLC, a company owned by the shareholders of Tropic Oil Company and Tropic Transportation, LLC. The term loan is secured by a warehouse and office facility that is leased to the Company and other unrelated tenants. Rent paid to the affiliate during 2017 was $11,057.

NOTE 7 - LINE OF CREDIT

The Company has entered into a credit and security agreement with a financial institution. The facility provides revolving credit loans and letters of credit under a borrowing base up to a maximum of $15,000,000. The amount outstanding under the line of credit facility was $9,194,571 at December 31, 2017. Outstanding principal bears interest at an interest rate equal to the LIBOR market index rate (as defined) plus 1.75%. The revolving credit facility agreement matures September 29, 2019.

Under the terms of the revolving credit agreement, the Company is entitled to borrow a percentage of accounts receivable based on the following: 100% of insured domestic accounts; 90% of uninsured domestic accounts; 90% of insured foreign accounts; and the lesser of 75% of pre-approved uninsured foreign accounts or $3,000,000. In addition, the Company may borrow a percentage of inventory measured at the lower of cost or fair market value as follows: 80% of pre-sold eligible inventory and 75% of non-pre-sold eligible inventory aged up to 90 days. Advances against inventory shall not exceed $8,000,000.

The revolving credit facility is collateralized by all personal property of the Company including accounts receivable, inventory, intangibles, and equipment. Additionally, under the terms of the credit agreement, the Company has agreed to restrictions regarding, among others, acquisition of additional indebtedness, and maintenance of certain leverage ratios.

NOTE 8 - NOTES PAYABLE

Long-term debt consists of the following obligations at December 31:

	2017	2016
Note payable in monthly principal and interest installments aggregating $7,584 through 2017. Interest is calculated at approximately 3.39%. *	$7,572	$89,473
Note payable under stock purchase agreement in quarterly principal and interest installments aggregating $58,336 through 2019. Interest is calculated at approximately 3.95%.	446,614	657,096
Note payable in monthly principal and interest installments aggregating $567 through 2019. *	9,072	15,877
Note payable in monthly principal and interest installments aggregating $6,702 through 2019. Interest is calculated at approximately 3.22%.*	155,575	229,690
	618,833	992,136
Less: Current portion	309,832	380,873
Long-term portion	$309,001	$611,263

Annual maturities of the notes payable are as follows:

2018	$309,832
2019	309,001
	$618,833

* Notes are collateralized by underlying equipment purchased.

NOTE 9 - COMMON STOCK

Tropic Oil Company has 259.842 shares of voting common stock and 259.842 shares of non-voting common stock authorized, of which 202.401 voting and 189.961 non-voting shares are issued and outstanding with a stated value of $5,716.

NOTE 10 - PENSION PLAN

Company employees twenty-one (21) years of age with six months of employment are eligible to participate in the Company's defined contribution 401k pension plan. The Company may match up to fifty (50) percent of an employee's elective deferral which does not exceed six (6) percent of the employee's compensation.

The Company's contribution for the year ended December 31, 2017 and 2016 amounted to $87,053 and $113,229, respectively.

TROPIC OIL COMPANY

Mobil

Tropic Oil Company was incorporated in the State of Florida in April, 1952

Executive officers: George E. LeVasser: CEO
Stephen J. Gorey: President

Federal I.D. # 59-0667006
Dun & Bradstreet Number: 03-257-0111

BANKING REFERENCES

Mercantil Bank N.A.
Matthew Bruno
Sr. Relationship Manager
Phone: 305-999-1475

CREDIT REFERENCES

Baro Hardware
Barbara Baro, Credit Manager
7230 NW 72 Ave.
Miami, FL 33166
Phone: 305-885-3371

Miami Tiresoles, Inc.
Abby Stafford, Credit Manager
7800 NW 103 St.
Hialeah Gardens, FL 33016
Phone: 305-821-2121

Oilmen's Truck Tanks Inc.
Trey Hill, President
140 Cedar Spring Rd.
Spartanburg, SC 29302
Phone: 800-859-8265

Nextran Truck Center
Christina Bermudez, Credit Mgr.
6801 NW 74 Ave.
Miami, FL 33166
Phone: 305-883-8506

Flow Master Services
Ted Schafer, Credit Manager
P O Box 607068
Orlando, FL 32860
Phone: 407-291-9636

In addition, we have credit with most of the major oil refiners and would be happy to furnish information upon request.
For further assistance, please contact Carlos Oro, CFO at (305) 888-4611.

Fidelity and Deposit Company of Maryland
Home Office: 600 Red Brook Boulevard, Suite 600, Owings Mills, MD 21117
Mailing Address: 1400 American Lane, T2-3, Schaumburg, IL 60196

Bond No. 30552605

CONTINUATION CERTIFICATE
For Miscellaneous Terms Bonds

Principal: Tropic Oil Company, Inc.

and the Fidelity and Deposit Company of Maryland, as Surety in a certain Bond No. 30552605 , with an effective date of the 1st day of January , 1995 in the penalty of :

Twenty Thousand and No/100 Dollars ($20,000.00)

In Favor of: Broward County
do hereby continue said bond in force for the further term(s) of one year(s) beginning on the 1st day of January , 2018 and ending on the 1st day of January , 2019 .

PROVIDED, however, that said bond, as continued hereby, shall be subject to all its terms and conditions, except as herein modified, and that the liability of the said Fidelity and Deposit Company under said bond and any and all continuations thereof shall in no event exceed the aggregate in the above named penalty, and that this certificate shall not be valid unless signed by said Principal.

Signed, sealed and dated this 7th day of August, 2018 .

Witness:

Tropic Oil Company, Inc.

_____ _____(SEAL)
Principal

_____ _____(SEAL)
Principal

_____ _____(SEAL)
Principal

FIDELITY AND DEPOSIT COMPANY OF MARYLAND

By: _____
Warren M. Alter, Attorney-in-Fact

Power of Attorney
FIDELITY AND DEPOSIT COMPANY OF MARYLAND
COLONIAL AMERICAN CASUALTY AND SURETY COMPANY

KNOW ALL MEN BY THESE PRESENTS: That the FIDELITY AND DEPOSIT COMPANY OF MARYLAND, and the COLONIAL AMERICAN CASUALTY AND SURETY COMPANY, corporations of the State of Maryland, by FRANK E. MARTIN JR., Vice President, and ERIC D. BARNES, Assistant Secretary, in pursuance of authority granted by Article Vl, Section 2, of the By-Laws of said Companies, which are set forth on the reverse side hereof and are hereby certified to be in full force and effect on the date hereof, does hereby nominate, constitute and appoint **Warren M. ALTER, David T. SATINE and Dawn AUSPITZ, all of Miami Lakes, Florida, EACH** its true and lawful agent and Attorney-in-Fact, to make, execute, seal and deliver, for, and on its behalf as surety, and as its act and deed: **any and all bonds and undertakings,** and the execution of such bonds or undertakings in pursuance of these presents, shall be as binding upon said Companies, as fully and amply, to all intents and purposes, as if they had been duly executed and acknowledged by the regularly elected officers of the Company at its office in Baltimore, Md., in their own proper persons.

The said Assistant Secretary does hereby certify that the extract set forth on the reverse side hereof is a true copy of Article VI, Section 2, of the By-Laws of said Companies, and is now in force.

IN WITNESS WHEREOF, the said Vice-President and Assistant Secretary have hereunto subscribed their names and affixed the Corporate Seals of the said FIDELITY AND DEPOSIT COMPANY OF MARYLAND, and the COLONIAL AMERICAN CASUALTY AND SURETY COMPANY, this 23rd day of November, A.D. 2010.

ATTEST:

FIDELITY AND DEPOSIT COMPANY OF MARYLAND
COLONIAL AMERICAN CASUALTY AND SURETY COMPANY

By:

Eric D. Barnes *Assistant Secretary* *Frank E. Martin Jr.* *Vice President*

State of Maryland }
City of Baltimore } ss:

On this 23rd day of November, A.D. 2010, before the subscriber, a Notary Public of the State of Maryland, duly commissioned and qualified, came FRANK E. MARTIN JR., Vice President, and ERIC D. BARNES, Assistant Secretary of the FIDELITY AND DEPOSIT COMPANY OF MARYLAND, and the COLONIAL AMERICAN CASUALTY AND SURETY COMPANY, to me personally known to be the individuals and officers described in and who executed the preceding instrument, and they each acknowledged the execution of the same, and being by me duly sworn, severally and each for himself deposeth and saith, that they are the said officers of the Companies aforesaid, and that the seals affixed to the preceding instrument is the Corporate Seals of said Companies, and that the said Corporate Seals and their signatures as such officers were duly affixed and subscribed to the said instrument by the authority and direction of the said Corporations.

IN TESTIMONY WHEREOF, I have hereunto set my hand and affixed my Official Seal the day and year first above written.

Maria D. Adamski *Notary Public*
My Commission Expires: July 8, 2011

Power of Attorney
FIDELITY AND DEPOSIT COMPANY OF MARYLAND
COLONIAL AMERICAN CASUALTY AND SURETY COMPANY

KNOW ALL MEN BY THESE PRESENTS: That the FIDELITY AND DEPOSIT COMPANY OF MARYLAND, and the COLONIAL AMERICAN CASUALTY AND SURETY COMPANY, corporations of the State of Maryland, by FRANK E. MARTIN JR., Vice President, and ERIC D. BARNES, Assistant Secretary, in pursuance of authority granted by Article VI, Section 2, of the By-Laws of said Companies, which are set forth on the reverse side hereof and are hereby certified to be in full force and effect on the date hereof, does hereby nominate, constitute and appoint **Warren M. ALTER, David T. SATINE and Dawn AUSPITZ, all of Miami Lakes, Florida, EACH** its true and lawful agent and Attorney-in-Fact, to make, execute, seal and deliver, for, and on its behalf as surety, and as its act and deed: **any and all bonds and undertakings,** and the execution of such bonds or undertakings in pursuance of these presents, shall be as binding upon said Companies, as fully and amply, to all intents and purposes, as if they had been duly executed and acknowledged by the regularly elected officers of the Company at its office in Baltimore, Md., in their own proper persons.

The said Assistant Secretary does hereby certify that the extract set forth on the reverse side hereof is a true copy of Article VI, Section 2, of the By-Laws of said Companies, and is now in force.

IN WITNESS WHEREOF, the said Vice-President and Assistant Secretary have hereunto subscribed their names and affixed the Corporate Seals of the said FIDELITY AND DEPOSIT COMPANY OF MARYLAND, and the COLONIAL AMERICAN CASUALTY AND SURETY COMPANY, this 23rd day of November, A.D. 2010.

ATTEST:

FIDELITY AND DEPOSIT COMPANY OF MARYLAND
COLONIAL AMERICAN CASUALTY AND SURETY COMPANY

By:

Eric D. Barnes *Assistant Secretary* *Frank E. Martin Jr.* *Vice President*

State of Maryland }
City of Baltimore } ss:

On this 23rd day of November, A.D. 2010, before the subscriber, a Notary Public of the State of Maryland, duly commissioned and qualified, came FRANK E. MARTIN JR., Vice President, and ERIC D. BARNES, Assistant Secretary of the FIDELITY AND DEPOSIT COMPANY OF MARYLAND, and the COLONIAL AMERICAN CASUALTY AND SURETY COMPANY, to me personally known to be the individuals and officers described in and who executed the preceding instrument, and they each acknowledged the execution of the same, and being by me duly sworn, severally and each for himself deposeth and saith, that they are the said officers of the Companies aforesaid, and that the seals affixed to the preceding instrument is the Corporate Seals of said Companies, and that the said Corporate Seals and their signatures as such officers were duly affixed and subscribed to the said instrument by the authority and direction of the said Corporations.

IN TESTIMONY WHEREOF, I have hereunto set my hand and affixed my Official Seal the day and year first above written.

Maria D. Adamski *Notary Public*
My Commission Expires: July 8, 2011

Make	Model	Year	VIN Number	Style	Location	Company
Peterbilt	330	2003	2NPNHD7XX3M809160	Box Truck	Cocoa	TT
Peterbilt	385	2005	1XPGDU9X85N874731	Day Cab	Cocoa	TT
Mack	CXU613	2018	1M1AW09Y8JM088575	Sleeper	Cocoa	Ryder Lease
Mack	CXU613	2018	1M1AW09Y3JM088578	Sleeper	Cocoa	Ryder Lease
Mack	CX613	2000	1M1AE06Y8YW002946	Sleeper	Cocoa	TO
Mack	GU813	2017	1M2AX13C8HM037650	TANKWAGON	Cocoa	TT
Peterbilt	340	2008	2NPRLN9X58M758886	TANKWAGON	Cocoa	TT
Freightliner	M2	2005	1FVHC5DAX5HN49406	TANKWAGON	Cocoa	TT
Polar	Tank Trailer	2005	1PMA2432855004306	Trailer	Cocoa	TT
Polar	Tank Trailer	2005	1PMA2432455004299	Trailer	Cocoa	TT
Heil	Tank Trailer	2001	5HTAB442727H66091	Trailer	Cocoa	TT
FRUEHAUF	Tank Trailer	1987	1H4T04520HL026007	Trailer	Cocoa	TO
HEIL	Double Pump Tank Trailer	2000	5HTAB4328Y7H63453	Trailer	Cocoa	TO
PJ Car Trailer	Flat bed	2007	4P5CC202071095428	Trailer	Cocoa	TO
BGFT	Tank Trailer	2017	4B9BF2022HM163053	Trailer	Medley	TO
International	4900	2001	1HTSDAAN81H344906	Box Truck	Medley	TO
International	4700	1996	1HTSCAAN5TH315076	Box Truck	Medley	TO
International	4900	1990	1HTSDZZN9LH252855	Box Truck	Medley	TO
Mack	GU713	2013	1M2AX04C0DM017931	Box Truck	Medley	TO
International	4400 SBA 4X2	2018	1HTMKTAN5JH100849	Box Truck	Medley	Ideal Lease
Mack	CXU613	2018	1M1AW02Y5JM088592	Day Cab	Medley	Ryder Lease
Mack	CXU613	2018	1M1AW02Y3JM088591	Day Cab	Medley	Ryder Lease
Mack	CXU613	2008	1M1AW02Y88N001370	Day Cab	Medley	TO
Mack	CXU613	2018	1M1AW02Y2JM088582	Day Cab	Medley	Ryder Lease
Mack	CXU613	2018	1M1AW02Y5JM088589	Day Cab	Medley	Ryder Lease
Mack	CXU613	2018	1M1AW02Y1JM088587	Day Cab	Medley	Ryder Lease
Mack	CXU613	2018	1M1AW02Y8JM088585	Day Cab	Medley	Ryder Lease
Mack	CXU613	2018	1M1AW02Y7JM088593	Day Cab	Medley	Ryder Lease
Mack	CXU613	2018	1M1AW02Y4JM088583	Day Cab	Medley	Ryder Lease
Mack	CXU613	2018	1M1AW02Y2JM089859	Day Cab	Medley	Ryder Lease
Mack	CXU613	2018	1M1AW02Y0JM089858	Day Cab	Medley	Ryder Lease
Mack	CXN613	2007	1M1AK06Y77N015300	Day Cab	Medley	TO
Mack	CXU612	2011	1M1AW01Y7BM002735	Day Cab	Medley	TO

Mack	CXU613	2018	1M1AW09Y6JM088574	Sleeper	Medley	Ryder Lease
Mack	CXU613	2018	1M1AW09Y5JM088579	Sleeper	Medley	Ryder Lease
Mack	CXU613	2018	1M1AW09Y1JM088580	Sleeper	Medley	Ryder Lease
Mack	CXU613	2018	1M1AW09Y3JM088581	Sleeper	Medley	Ryder Lease
Mack	CXU613	2018	1M1AW09Y1JM088577	Sleeper	Medley	Ryder Lease
Mack	CV713	2005	1M2AG11C05M025992	TANKWAGON	Medley	TO
Mack	RD688S	1998	1M2P267C5WM034816	TANKWAGON	Medley	TO
Ford	L8000	1995	1FDXS82E2SVA12278	TANKWAGON	Medley	TO
Mack	GU713	2015	1M2AX07C1FM023607	TANKWAGON	Medley	TT
Mack	GU713	2013	1M2AX04CXDM017449	TANKWAGON	Medley	TO
Mack	RD688S	2001	1M2P267CX1M059705	TANKWAGON	Medley	TO
Mack	CV713C	2007	1M2AG11CX7M067945	TANKWAGON	Medley	TO
FRUEHAUF	Tank Trailer	1988	1H4T04322JK019011	Trailer	Medley	TO
LBT	Tank Trailer	2006	4J8T042257T005603	Trailer	Medley	TO
LBT	Tank Trailer	2007	4J8T042277T005604	Trailer	Medley	TO
FRUEHAUF	Tank Trailer	1987	1H4T04228HL001604	Trailer	Medley	TT
Heil	Tank Trailer	1996	5HTAB4320T7H60202	Trailer	Medley	TT
FRUEHAUF	Tank Trailer	2003	4J8T042253T002503	Trailer	Medley	TT
FRUEHAUF	Tank Trailer	1988	1H4T04322JL034005	Trailer	Medley	TO
FRUEHAUF	Tank Trailer	1989	1H4T04220KL012104	Trailer	Medley	TO
FRUEHAUF	Tank Trailer	1990	1H4T04228LL014006	Trailer	Medley	TO
HEIL	Tank Trailer	1999	5HTAB4320X7H63302	Trailer	Medley	TO
STOUGHTON	Box Trailer	2011	1DW1A3221BS271801	Trailer	Medley	TO
HEIL	Tank Trailer	2002	5HTAB442X27H6120	Trailer	Medley	TT
FRUEHAUF	Tank Trailer	1989	1H4T04221KL021801	Trailer	Medley	TT
Monn	53ft box trailer	1994	1NNVX5327RM213031	Trailer	Medley	TO
Heil	Tank Trailer	1998	5HTAB4324W7H62250	Trailer	Medley	TT
WOLV	Flat bed		5BXH1CA21HJ041785	Trailer	Medley	TO
HEIL	Tank Trailer	2004	5HTAB442X447H66184	Trailer	Medley	TT
Mack	CXU613	2018	1M1AW02Y1JM088590	Day Cab	North	Ryder Lease
Mack	CXU613	2018	1M1AW02YXJM088586	Day Cab	North	Ryder Lease
Mack	CXU613	2018	1M1AW02Y3JM088588	Day Cab	North	Ryder Lease
Peterbilt	385	2005	1XPGDU9X55N874735	Day Cab	North	TT
Peterbilt	385	2005	1XPGDU9X15N874733	Day Cab	North	TT

Peterbilt	385	2005	1XPGDU9XX5N874732	Day Cab	North	TT
International	LT625 6X4	2018	3HCDZAPR9JL100851	Day Cab	North	Ideal Lease
Mack	CXU613	2018	1M1AW09YXJM088576	Sleeper	North	Ryder Lease
Heil	Tank Trailer	2014	5HTAB4321E7H79246	Trailer	North	TO
LBT	Tank Trailer	2015	4J8T04228FT004901	Trailer	North	TT
FRUEHAUF	Tank Trailer	1987	1H4T04223HL001610	Trailer	North	TT
Heil	Tank Trailer	1986	A3A7B6G7H53144	Trailer	North	TT
Polar	Tank Trailer	2005	1PMA2432655004305	Trailer	North	TT
Polar	Tank Trailer	2005	1PMA2432455004304	Trailer	North	TT
Polar	Tank Trailer	2005	1PMA2432755004300	Trailer	North	TT
Polar	Tank Trailer	2005	1PMA2432255004303	Trailer	North	TT
Polar	Tank Trailer	2005	1PMA2432055004302	Trailer	North	TT
Polar	Tank Trailer	2005	1PMA2432955004301	Trailer	North	TT
FRUEHAUF	Tank Trailer	1979	UNZ610515	Trailer	North	TT
FRUEHAUF	Tank Trailer	1979	UNV636001	Trailer	North	TT
HEIL	Tank Trailer	1981	1HLA3A7B4B7G51561	Trailer	North	TT
HEIL	Tank Trailer	1981	A3A7B6B7G51562	Trailer	North	TT
HEIL	Tank Trailer	1979	950290	Trailer	North	TT
HEIL	Tank Trailer	1979	950291	Trailer	North	TT
HEIL	Tank Trailer	1976	927768	Trailer	North	TT
FRUEHAUF	Tank Trailer	1988	1H4T04326JL034007	Trailer	North	TO
FRUEHAUF	Tank Trailer	1997	4J8T04221VT013601	Trailer	North	TO
FRUEHAUF	Tank Trailer	1994	1H4T04320RL004402	Trailer	North	TO
Trai	12ft Enclosed	1996	40LUB1428TP032505	Trailer	North	TO
HEIL	Tank Trailer	1979	950293	Trailer	North	TT

BROWARD COUNTY LOCAL BUSINESS TAX RECEIPT

115 S. Andrews Ave., Rm. A-100, Ft. Lauderdale, FL 33301-1895 – 954-831-4000

VALID OCTOBER 1, 2018 THROUGH SEPTEMBER 30, 2019

DBA:
Business Name: TROPIC OIL CO

Receipt #: 372-135595
Business Type: WHOLESALE PETROLEUM (WHOLESALE PETROLEUM PRODUCTS)

Owner Name: GEORGE E LE VASSER/PRESIDENT
Business Location: 10002 NW 89 AVE
MIAMI DADE COUNTY
Business Phone: 763-7347

Business Opened: 10/01/1983
State/County/Cert/Reg:
Exemption Code:

Rooms	Seats	Employees	Machines	Professionals

	For Vending Business Only					
	Number of Machines:			Vending Type:		
Tax Amount	Transfer Fee	NSF Fee	Penalty	Prior Years	Collection Cost	Total Paid
112.50	0.00	0.00	0.00	0.00	0.00	112.50

THIS RECEIPT MUST BE POSTED CONSPICUOUSLY IN YOUR PLACE OF BUSINESS

THIS BECOMES A TAX RECEIPT

WHEN VALIDATED

This tax is levied for the privilege of doing business within Broward County and is non-regulatory in nature. You must meet all County and/or Municipality planning and zoning requirements. This Business Tax Receipt must be transferred when the business is sold, business name has changed or you have moved the business location. This receipt does not indicate that the business is legal or that it is in compliance with State or local laws and regulations.

Mailing Address:

TROPIC OIL CO
10002 NW 89 AVE
MIAMI, FL 33178

Receipt #032-17-00001164
Paid 07/23/2018 112.50

2018 - 2019

HEALTH, SAFETY, SECURITY, AND ENVIRONMENT

I. Preserving Human Assets
II. Responsibilities
III. Health
IV. Potential Plant Hazards
V. Organizational Safety
VI. Emergency Procedures
VII. Personal Protective Equipment (PPE)
VIII. General Safety Instructions
IX. Environment

Preserving Human Assets

As in quality, occupational health, operational safety, workplace security, and environmental management (HSSE) is a leadership function, and failures in either realm harbor immediate implications for the other. HSSE is a universal responsibility throughout the Company and is symptomatic of a professional atmosphere characterized by clear communications, candor, and personal responsibility. Every member of the Tropic Oil team is empowered to halt ***any*** process in the name of safety or quality. This is what makes Tropic Oil Company ***the*** recognized leader in quality assurance within ExxonMobil, inviting entry into their elite "Quality Circle" in 2011.

The success of our company is based upon the marketability of our products and services. Securing and extending this marketability depends upon Quality and Reliability. The Work Environment, Health and Safety of our staff (as well as third parties) are important factors in all of our operations. These principles are also stipulated in the Tropic Oil Company philosophy.

- **Our operations focus on our customers**
- **We are committed to Quality, Work Safety, and Environmental Excellence**
- **Collaboration in a spirit of trust and confidence is universal**
- **The jobs that Tropic Oil Company provides are secured by economic success.**

Our efficiency and our objectives are demonstrated - among other things - by the fulfillment of the following principles:

- **We move heaven and earth to meet all agreements made with the Client, considering all legal considerations and supplier quality standards.**

- **Quality, Work Safety, Health and Environmental Protection together lead to economic success.**
- **The behavior of Management regarding safety and environment is the most influential element of our HSSE program.**
- **Careful planning and performance prevent mishaps and incidents.**
- **Quality, Work Safety, Health and Environmental Protection require continual Improvement.**
- **We operate at all times with all means in an environmentally-friendly manner.**
- **Reducing waste also prevents pollution.**

Tropic Oil Company's Integrated Management System is consonant with ISO 9001, ISO 14001 and OHSAS 18001; we guarantee our clients that we carry out operations with quality, safety, and reliability. These systems make company processes clear to all staff members and consequently improve cooperation. They establish a relationship of personal confidence between Tropic Oil and its partners on the one hand, and the client on the other. Every member of this Company is responsible for the quality of his work and for observing the regulations of work safety as well as health and environmental protection. In doing so, the Employee supports the Management in their overall responsibility to realize the company objectives.

- The responsibility for Safety lies with each individual employee, from management through to labor. We achieve our target of zero workplace accidents by promoting personnel safety awareness, safety training, and mitigation of unsafe work practices through our Quality Assurance and Operations Management personnel.
- The main objective of Safety Regulations is to avoid human suffering from injuries and damage to material assets. All these regulations are to be complied within a strict manner. Safety is as important as other business activities. Accidents and injuries are unacceptable.

- We shall conduct our activities in a manner that ensures the health and safety of our staff, our subcontractor employees and other persons whom our activities affect. We shall protect the environment and wherever possible, return surroundings to their natural state.

- No personnel shall be under the influence nor partake of any alcohol/drugs any time during his duty hours. This admonition can also be found in our employee handbook. Drivers of our vehicles must be randomly tested per DOT regulations.
- We shall ensure the protection and safe operation of the plant, all sites, and equipment.
- We shall comply fully with all federal, state, and local laws and statutes.
- All Tropic Oil personnel do everything possible to prevent accidents, thereby creating a safe environment in which to work.

This H.S.S.E. chapter prescribes minimum standards of safety and environment. It is the duty of all personnel to comply with the procedures laid down in this SOP, but also to observe any other relevant regulation prescribed by the competent authorities who have control over our work execution at their sites, ports, and places of business.

Responsibilities

Tropic Oil Quality Assurance is responsible for maintaining 'Health, Safety and Environmental Protection' at the main plant in Medley. All operations personnel bear responsibility for safety in their areas of activity away from the main plant.

Each individual staff member has responsibility and accountability within his work assignment and within his level of expertise. Every colleague is his own safety officer and has a duty to intervene in his fellow workers' health and safety.

VP, Quality Assurance

VPQA exercises overall control over, and responsibility for Tropic Oil Company's HSSE planning and policies. He will arrange for the necessary budgeting provisions to meet the requirements of Health, Safety, Security and Environment planning. He also has full responsibility for all Health, Safety, Security and Environment matters associated with all contracting operations. He will:

- Ensure that all supervisors are made aware and accountable for implementing this Health, Safety, Security and Environment plan.
- Ensure that the work on all contracts conform to Health, Safety, Security and Environment Legislation and other overlapping regulatory requirements.

- Ensure that all subordinate staff adheres to the requirements of the Tropic Health Safety and Environment policy and that client's procedures/regulations are followed.

- Monitor compliance of this Health, Safety, Security and Environment policy with respect to Supervisors and contract co-coordinators.

- Ensure that all employees are provided with the necessary safety equipment and protective clothing and are made available for safety training as required.

- Ensure that all new personnel receive mandated safety training.

- Review supplier hazard advisories and statistics and ensure that HAZREP and Mishap Report recommendations are reviewed and closed out.

- Promote an awareness of emerging hazards and that a safe working environment and mishap prevention are integral parts of individual responsibilities.

- Obtain budgeting resources for compliance with the rules of regulatory agencies and the demands of our clients' unique local equipment and behavioral requirements.

- Ensure that all employees are fully aware and implement Waste Management properly.

- Issue clear, specific and timely instructions on Health, Safety, Security and Environment Policy when directing operations.

- Ensure the use of SOP guidelines and checklists found in this SOP.

- Ensure plant infrastructure and equipment is properly maintained and that inspections and preventive maintenance have been carried out as prescribed.

- At all times set a personal example. Ensure that items that threaten the safety of Company personal (e.g. explosives) are not brought on to company premises.

Plant Manager

- Be fully conversant with client's relevant H.S.S.E documents and emergency procedures.
- Provide advice to Drivers on unique client H.S.S.E matters.
- Ensure familiarity of operations personnel with emergency response plans, procedures, and evacuation drills.
- Prepare, program, and carry out regular inspections of all plant infrastructure and vehicles.
- Carry out in-house H.S.S.E audits in cooperation with VP Quality Assurance.
- Report accidents/near misses to Quality Assurance.
- Maintain daily inspection sheets for all vehicles and make it available for inspection by VPQA.
- Obtain material for use in safety training.
- Prepare training plan.
- Give orientation briefings and assign specific training & licensing courses.
- Ensure that mandatory meetings are attended by the required personnel.
- Maintain records for Driver qualifications and safety training, equipment inspection and audits.
- Ensure that all equipment records are kept updated.

Subcontractors' Responsibility/Accountability

Before any subcontracting organization is permitted to perform any works for Tropic Oil Company, they must submit their Safety Manual for approval to the VP Quality Assurance, to establish that their company policies conform to those of Tropic Oil. Tropic Oil Company expects that all of its subcontractor's personnel comply with this its Health, Safety, Security and Environment interests as well as those of the client. Tropic is responsible for every one of its employees as well as those of its subcontractor(s).

- If the subcontractor's Safety Manual is not in conformance with this SOP and our HSSE plan, the subcontractor will be provided with excerpts of the more restrictive of the two and directed to adjust their procedures, if necessary.

- This conformance must be presented and approved prior to any subcontract work commencement.
- The subcontractor must provide evidence that he is adequately insured in compliance with the terms and Conditions of the contract with Tropic Oil.
- The subcontractor's responsibilities will be specified related to the works to be subcontracted.

Health

First-Aid Training A schedule for First Aid Training is prepared annually and the training program is conducted quarterly over the ensuing year.

- The first aid training is documented and the names of the CPR-qualified are displayed in conspicuous places.

Occupational Health Procedures Plant health hazards are identified during new employee orientation. In the case of client facilities, a site survey is conducted by Quality Assurance and identified hazards are mitigated before employees are exposed to new substances or threatening environments.

- Job sites/work areas are inspected regularly to manage potential risks.
- Emergency facilities, first aid points, medical clinics, eye wash stations, emergency showers are identified/provided where required.
- Personal protective equipment and essential communications equipment are made available.
- Personnel are monitored for regular medical examinations to ensure general well-being and to identify possible long-term developing problems.
- Personnel who are exposed to any health hazards, are immediately given first aid and referred to a nearby clinic/hospital as early as possible. The accumulative effects of even low-risk exposure can be hazardous.
- Tropic Oil personnel are sometimes exposed to the danger of fuel, oil, or solvent splashes on their clothes, particularly Drivers and Warehousemen. Changing rooms and wall lockers are provided to eliminate prolonged exposure to contaminated clothes.
- Washing facilities with soap are provided to prevent skin irritation or chemical burns.

- Cool drinking water and ice are provided at work area to avoid contamination.
- Humidity and associated sweating makes heat casualties a reality in South Florida, even during winter. Supervisors must be on guard for "can-do" employees who show signs of heat fatigue or failure to observe protective measures.
- Supervisors will ensure that Tropic and client health and hygienic standards are complied with at work sites. The Plant Manager will audit the Drivers daily on their standards of health and hygiene.
- 'No Smoking' signs will be placed at all flame critical locations.
- Warehouse and storage areas shall have a minimum of one dry powder type fire extinguisher per section.
- All staff handling hazardous materials shall have proper clothing, masks, gloves, etc. to avoid skin contact.
- All safety procedures on site will be followed strictly. Personal safety items are not optional.

Potential Plant Hazards

Materiel Handling and Storage

- **Risk:** Physical injury, property or material loss due to incorrect use, handling or storage of material.
- **Persons at Risk:** Warehousemen and Drivers involved in the use of forklift and pallet jack equipment.
- **Precautions:**
    - All materials will be stored, handled and used in a safe and proper manner.
    - Offloading and storage will be properly controlled / supervised at all times.
    - Tag lines/chocks will be used to control material during loading and offloading.
    - Personnel will be properly trained/licensed in safe methods of material handling.
    - No material is allowed to be dropped into seawater or fresh waterways.

- Storage areas are identified and unauthorized entry will be controlled by use of barriers, warning signs, video surveillance, and close supervision.
- Appropriate personal protective equipment, such as steel-toed boots, gloves and hard hats will be worn at all times.
- Personnel will be advised of new risks prior to commencement of work.
- The use of cell phones, pagers, iPods, and PDAs is expressly prohibited while operating machinery.

Welding / Grinding Operations

- **Risk:** Fire, explosion, electrocution, and other physical injury caused by equipment malfunction or unsafe working methods.
- **Persons at Risk:** All personal involve in garage & maintenance operations
- **Precautions**:
  - All welding equipment will conform to safe standards as outlined in the manufacturers' best practices guide.
  - Suitable types and quantities and fire extinguishers will be available to cover all areas of work.
  - All flammable liquids shall be kept away at least 15 meter from hot work areas.
  - Personal protective equipment, such as eye protection, shall be worn at all times
  - Work will be properly supervised at all times.
  - Good housekeeping policy is enforced; fire blankets will be used to contain sparks.
  - Personnel will be advised of new risks by supervisors prior to commencement of work.

Working at Height / Scaffolding

- **Risk:** Physical injury caused by falling from height, or being struck by falling objects.
- **Persons at Risk:** All persons engaged on scaffolding erection and warehouse personnel operating in the mezzanine.

- **Precautions:**
    - Scaffolding will be erected / constructed per recognized and approved standard with particular reference to working in proximity to moving vehicles.
    - Only properly trained / competent scaffolders will erect structures and always under supervision from the Maintenance Supervisor.
    - Fall protection equipment will be used by individuals at all times (full body harness and safety lanyards).
    - Area should be secured from moving traffic (including forklifts) and only authorized personnel are allowed to work on scaffolds.
    - Personnel will be advised of unique risks through supervisor talks prior to commencement of work.
    - Safety netting and booms are employed to prevent product or equipment from falling into water.
    - Mezzanine operations will be concluded with the replacement of all safety rails fully seated in their brackets.

Working at Height / Mobile Scaffolding

- This is not to be used until approved by the VP Quality Assurance.
- When performing work involving any risk of falling due to structural changes to scaffolding, all necessary safety precautions must be taken (e.g. scaffolding modification, safety belts, safety ropes, etc.).
- Mobile scaffolding is to be put up in accordance with the manufacturer's instructions, checked for damage before every use, and released for use only by the Maintenance Manager.
- They may only be assembled and dismantled by maintenance staff familiar with the relevant instructions and information regarding these procedures.
- Damaged components may not be used.
- Only original parts per manufacturer's labeling may be used.

- The surface on which the platform is to be moved must have the strength to take the load.
- No materials or persons may be on the platform when it is moved.
- Mobile working platforms may only be moved manually on solid flat surfaces with no obstructions. The normal walking pace may not be exceeded when moving such platforms.
- Check that the platform has been completely and correctly assembled according to the manufacturer's instructions and is standing completely with wheels locked before use.
- Installing bridging between mobile platforms and any building(s) is not permissible.
- Make sure that all safety precautions against unintentional movement of the platform have been taken (application of chocks or spindle brakes before use.
- Stepping on and off the working surface is only permissible via the accesses installed.
- Jumping on the working surface is not permitted. Wherever possible, working platforms outside buildings should be secured to buildings.

Working at Height / Railcar and Loading Rack Operations

- **Risk:** Physical injury caused by falling from height, or being trapped between structures.
- **Persons at Risk:** All persons engaged in railcar off-loading and warehouse personnel conducting loading operations on the loading rack.
- **Precautions:**
    - Safely climbing to the top of a railcar requires harnessing up in fall arrest equipment.
    - A spotter shall be present when climbing any railcar.
    - All Company personnel and clients shall wear in fall arrest equipment whenever stepping on the boarding ladders or mounting vehicles, ISO tanks, or trailers.

- Personnel will be advised of unique risks through supervisor talks prior to commencement of work.

Confined Space Operations

- **Risk:** Asphyxiation, chemical inhalation, chemical burns through eye or skin contact.
- **Persons at risk:** Maintenance personnel involved in the cleaning of product storage tanks, drains, and oil-water separators.
- **Precautions:**

a) Inhalation

Air quality shall be tested and appropriate respiratory equipment shall be donned before work. Equipment failure or failing to wear respiratory equipment may cause respiratory duress, respiratory tract irritation, and wheezing. Remove person from source of exposure without risking additional casualties and move to fresh air. If not breathing performs CPR and get medical attention.

b) Eye Contact

Do not wrap eyes. Get medical attention if irritation persists beyond a short period. Flush immediately with large amount of clear water for at least 15 minutes. Eyelids should be held away from the eyeball to ensure thorough rinsing.

c) Skin Contact

Slight-to-moderate irritation, inflammation and rash. If skin becomes irritated, remove contaminated clothing, do not rub or scratch the exposed skin, wash area of contact thoroughly with soap and water. Get medical attention if irritation persists beyond a short period.

Organizational Safety

The Plant Manager and all site managers have a duty to carry out daily safety inspections. To avoid human suffering from mishap injuries and to prevent damage of plant infrastructure and equipment, safety orientation training will be given to each employee before engaging him in any work. He will be taught within his discipline about the safety regulations and emergency procedures to be followed in case of fires, fuel spills, explosions, etc., depending upon site conditions. Employees will be given further safety training as their responsibilities increase to

ensure that they have the technical skills and safety awareness necessary to perform their assigned jobs properly and safely. Workers involved in special assignments, e.g. driving tank wagons, working at heights, working in confined spaces, etc., where additional skills are needed will be given specialized training and licensing per the job requirement.

All employees will be deputed to mandatory safety training courses, as for example:

SI -No.	Course Title	Mandatory to	Frequency
1	Tropic Oil H.S.S.E Introduction	All staff	Prior to work
2	Oil and fuel spill remediation	Drivers and Warehousemen	Annually.
3	Basic fire extinguisher	All staff	Annually
4	Industrial First Aid	10 % of work force	Annually
5	Supervising Safety	All supervisors	Assumption of duties
6	Gas tester	All Maintenance Personnel	Annually
7	Forklift Safety & Standardization	All Warehouse and Maintenance	Every 3 years
8	Hazardous Materials	All Drivers	Every 3 years

Position-relevant instruction/training

- Safety instruction with the following content is to be given to all new employees:
    - Fire alarm, extinguishers, evacuation routes, assembly area
    - Personal safety equipment
    - Quality Assurance safety plan:

    - Plant layout and access routes.

    - Mishap/hazard reporting,

    - Waste disposal

    - Spill remediation

- Environmental awareness

- Anonymous safety reports ("Anymouse")

- This is to be done by the Plant Manager / VPQA, documented on the Tropic Oil employee training form and kept in the employee's training record.

- Project-specific training priorities are identified from the risk analysis conducted by Quality Assurance and courses given and repeated regularly as conditions demand.

Emergency Procedures

An emergency is an abnormal occurrence which cannot be handled or controlled by the equipment or personnel available in the immediate area.

Emergency Response Procedures An emergency may occur at the Main Plant or at a work site due to the following:

- Fuel leak at site
- Fire at Plant/site
- Fall from height
- Collapse of scaffolding
- Electric shock
- Falling off of a dock/pier into the sea

Fuel Leak at Plant

1- Issue an alarm and close the emergency shut-off valve.

2- If you are in a vehicle, switch off the engine and evacuate the cab.

3- Ensure all pumps and vehicles are shut down

4- Check the flag pole (wind direction) and depart the area away from the fumes.

5- Inform the Plant Manager of the leak and follow his instructions.

6- If you have observed any person affected/unconscious, inform the Plant Manager. If you were trained in first aid, help the Plant Manager to rescue any victims until EMTs arrive.

7- Inform the first responders of the emergency and affected person(s).

B. Fire at Main Plant

1. Shout "fire, fire" to alert personnel in vicinity and call 911.

2. Leave the area at once. If you are in a room, close the doors and windows before you come out.

3. Break the glass at the fire alarm point.

4. If the fire is small. Pick up the correct type of fire extinguisher, take the correct position and extinguish the fire.

5. If the fire is big, leave the area and assemble at assembly point inside front gate.

6. Wait for instructions at the fire assembly point.

7. Do not re-enter the area unless instructed.

8. Be patient and do not panic.

C. Fall from Height

1. Assess the situation. Call 911 and give information to the operator regarding the victim.

2. Check whether the victim is conscious/unconscious. Comfort him and assure him that he will be alright. Do not move victim absent impending danger.

3. If victim is unconscious, check for breathing and pulse.

4. If breathing and pulses are not normal, give CPR, if you are trained.

5. Call the Plant Manager immediately and follow his instructions.

6 In case of heavy bleeding, apply pressure at the right point, or per the instructions of those with first aid training.

7. Keep close eye on the victim and wait until the medical assistance arrives on site.

D. Collapse of Scaffolding

1. Assess the situation; check if anybody is trapped under the scaffolding.

2. Try to remove him from trapped condition, without further damaging the scaffolding or injuring the victim.

3. Call 911 & Plant Manager and give information regarding the help required.

4. Give first aid to the victim.

6. Switch off power to any damaged electrical systems to avoid electrocution.

7. Do not allow anybody to cross under overhanging portion of scaffolding.

8. If breathing and pulse are not normal, give CPR if you are trained.

9 Keep close eye on the victim and wait until the medical assistance arrives on site.

10. Barrier the endangered area, actively limit exposure to danger as fast as possible.

E. Electric Shock

1. Assess the situation.

2. Switch off all the electrical system(s).

3. Try to remove the victim if he is trapped, with the help of wood planks or poles.

4. Call Plant Manager & 911; give information to the operator regarding the help required.

5. Call those with first aid training quickly and check breathing/pulse of the victim.

7. If breathing and pulse are not normal, give CPR if you are trained.

8. Ask site electrician to check all power tools/electrical systems to isolate fault.

9. Keep close eye on the victim and wait until EMTs arrive on scene.

F. Falling into the sea

1. Shout to alert persons in the vicinity.

2. Call the ship's/USCG emergency number, inform the Chief Engineer to arrange rescue boat.

3. Check whether the victim is conscious/unconscious.

4. If victim is unconscious, check for breathing and pulse.

5. Call for first aid immediately and follow first responder instructions.

6. If breathing and pulse are not normal, give CPR, if you are trained.
7. Stay with victim and wait until EMTs arrive on site

Personal Protective Equipment (PPE)

Tropic Oil Company's Employee Handbook obligates all personnel to care for and use the safety equipment issued to them. This includes:

- Hearing protection
- Eyesight protection
- Face protection
- Work uniforms and headgear
- Respiratory protection (dust, gasses, fumes)
- Hand protection
- Skin protection
- Foot protection
- Safety harness (on rack or scaffolding)
- Life Jackets / Life Preserver per USCG regulations

General Safety Instructions

- All work areas shall be well maintained and adequately protected from accidents and health hazards.
- Every employee shall know about the hazards involved and safety precautions to be taken in the job he is entrusted with.
- New employees shall be made aware of the hazards involved in the jobs in which they are engaged.
- Proper warning notices shall be posted where danger exists to make persons conscious of hazards.
- Unauthorized persons are not allowed to enter any work areas without escort.

- After work is completed, the area will be thoroughly cleaned and all debris is removed to the places allocated for this purpose.
- Good housekeeping is to be maintained throughout the duration of work.
- Smoking is strictly prohibited except in designated areas.
- All employees wear proper working attire for the job they are engaged in.
- Every non-administrative employee must wear safety shoes while at work.
- Safety devices and personal protective equipment must be used invariably where directed.
- Any hazard observed should be promptly brought to the attention of all personnel in the area and then management for necessary corrective action.
- There shall be proper communication and co-operation between departments when they work in the same area so no one creates hazardous conditions for the others.
- If in doubt, one should contact Quality Assurance for necessary clarification.
- Nobody is allowed to indulge in "horseplay" at any site or on the Main Plant.

Environment

All staff and subcontractors will fully comply with the environmental legislation as issued by the Miami-Dade Department of Environmental Resource Management, the State of Florida Department of Environmental Protection, the Environmental Protection Agency, and those more stringent guidelines issued by the Company.

Waste Management and Effluent Control/Reduction

- All Company staff and subcontractors will fully comply with client's program for waste and effluent control.
- Each supervisor shall be responsible for the activity of each member of their crew.
- All staff and subcontractors will fully comply with the Tropic Oil Company Spill Prevention, Control, and Countermeasure Plan (SPCC).
- Waste Management and Effluent Control/Reduction is the responsibility of each individual, however each crew supervisor must ensure that the SPCC and Tropic Oil policies are followed.

- All waste materials and the containers in which they are to be disposed of must be listed on this form for each project / site.

Serial No.	Waste description	Container Color
1	Metal Waste	Red
2	Glass Waste	Green
3	Plastic	Blue
4	Paper	White
5	Fluorescent bulb Waste	Yellow

TROPIC TRANSPORTATION, LLC

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COMMERCIAL MOTOR VEHICLE DRIVER SAFETY POLICY

(Supplement to Employer's Drug-Free Workplace Policies)

The purpose of this policy is to help prevent accidents and injuries resulting from the misuse of alcohol or controlled substances by Drivers of commercial motor vehicles. All employees and owner-operators, if required to have a commercial Driver's license (CDL) under 49 CFR Part 383 (hereinafter referred to as "Drivers"), are subject to these controlled substance and alcohol testing rules established by the Federal Highway Administration (FHWA) under the Omnibus Transportation Employee Testing Act of 1991 (revised February 1994), in accordance with 49 CFR. Parts 40, 382, and § 395.2. With the exception of sanctions for violations of State or local criminal laws applicable to the general public, including Drivers and employers, § 382.109 of these Federal Motor Carrier Safety Regulations preempts any other State or local laws, rules, regulations, or orders which could otherwise obstruct compliance.

Regulatory penalties for infractions described herein are in addition to disciplinary consequences, including possible termination of employment, which may also be imposed by employers for workplace abuse of drugs or alcohol.

ALCOHOL PROHIBITIONS: Drivers shall not report for duty or remain on safety sensitive duties [a] with a breath alcohol concentration of 0.04 or greater, [b] if in possession of alcohol, unless it is listed on the transport manifest, [c] if using alcohol on duty, or [d] if having used alcohol *from any source* within 4 hours of reporting for duty. Drivers found to have breath alcohol concentration of 0.02 or greater, *but less than* 0.04, shall not perform or be permitted to continue to perform safety-sensitive functions until the start of the Driver's next regularly scheduled duty period, but not less than 24 hours following administration the positive alcohol test, unless an interim alcohol test has been administered which registers a breath or saliva alcohol concentration below 0.02.

CONTROLLED SUBSTANCES PROHIBITIONS: Drivers shall not report for duty or remain on safety sensitive duties when using any controlled substance, except when such use is pursuant to the instructions of a licensed physician *who has advised the Driver that the substance does not adversely affect the Driver's ability to safely operate a commercial motor vehicle.* Drivers shall not report for duty, remain on duty or perform safety-sensitive functions when tested positive for illegal controlled substances, until released for return-to-duty by a Substance Abuse Professional, as hereinafter provided. Drivers are prohibited from having bodily concentrations of drugs exceeding threshold levels listed below unless prescribed by a physician.

Amphetamines 500 ng/mL	Opiates 2000 ng/mL
Benzoylecgonine (Cocaine) 300 ng/mL	Phencyclidine (PCP) 25 ng/mL
Cannabinoids (Marijuana) 50 ng/mL	MDMA (Ecstasy) 500 ng/mL

REQUIRED TESTS: Drivers are required to submit to controlled substances testing under the following conditions; [1] Pre-employment (§ 382.301), unless a Driver has been tested under Part 382 Rules within 6 months or subject to Random testing for 12 months preceding application and verification is obtained from previous employer(s) that violations haven't occurred within 6 months preceding application, [2] Post-accident, (§ 382.303), (a) when either a fatality has resulted, or (b) after receiving a moving vehicle citation linked to an accident *and* bodily injury to a person has *also* occurred requiring immediate medical treatment away from the scene of the accident *and/or* one or more of the vehicles involved incurred disabling damage requiring transport or towing away from the accident scene. [3] Random (§ 382.305), at an initial annualized rate of 25% of all Drivers for controlled substances testing and 10% of all Drivers for alcohol testing, [4] Reasonable Suspicion (§ 382.307), when ordered by a supervisor or company official trained under § 382.603, [5] Return-to-duty (§ 382.309), after engaging in alcohol or controlled substance prohibitions stated in Part 382, Subpart B, and [6] Follow-up (§ 382.311), for a period of up to five (5) years after return to duty, if ordered by a Substance Abuse Professional (SAP).

Pre-employment alcohol testing is no longer required. Subject to certain restrictions, alcohol testing may be performed for any of the other reasons listed for which controlled substance testing may also be required. Alcohol testing may only be performed during periods just before, during, or immediately after Drivers perform safety sensitive functions which are defined by § 395.2 *(On-Duty Time)* as driving, inspecting, servicing, unloading or loading a motor vehicle.

Both controlled substances and alcohol testing must be performed for all Drivers subject to Post-accident testing. Drivers are to secure a controlled substances test within a maximum of up to 32 hours and an alcohol test within up to 2 hours following the accident. If the required alcohol test cannot be performed within 2 hours, up to a maximum of 8 hours is permitted providing reasons for delay are recorded for review by FHWA upon request. Drivers subject to Post-accident testing may not use alcohol for 8 hours following the accident or until a Post-accident alcohol test has been completed, whichever occurs first. If controlled substance tests cannot be collected within 32 hours and alcohol testing cannot be completed within 8 hours, further attempts to complete the delayed test(s) must cease and the reasons testing was not administered must be documented by the employer for review by the FHWA upon request.

Random testing for controlled substances or alcohol must be performed *immediately* after notification of selection unless a Driver is then performing safety-sensitive functions defined by § 395.2. *(On-Duty Time),* in which event, the employer must ensure the Driver safely ceases performing said functions and proceeds for testing as soon as possible.

REFUSAL TO TEST: Drivers *refusing* tests required by DOT Regulations will be subject to the same disciplinary consequences as may otherwise be imposed by an employer for positive test results, and in addition, employers must not permit Drivers refusing to submit to testing to continue to perform safety- sensitive functions. In addition to overt actions or statements, a Driver's refusal to submit to an alcohol or controlled substances test may be determined by [1] failure to provide adequate breath (or saliva) for testing *without a valid medical explanation* after he or she has received notice of the 49 CFR Part 382 requirements for alcohol testing, [2] failure to provide adequate urine for controlled substances testing *without a valid medical explanation* after he or she has received written notice of 49 CFR Part 382 requirements for urine testing, or [3] engaging in conduct that clearly obstructs the testing process.

LAB QUALIFICATIONS: All testing for controlled substances performed in conjunction with this Policy must be conducted in accordance with 49 CFR Part 40. Only laboratories certified by the Substance Abuse and Mental Health Services Administration (SAMHSA) will perform analysis of urine specimens. Specimen collections will only be performed by qualified collectors trained to follow authorized collection and chain-of-custody protocols.

MEDICAL REVIEW OFFICER PURPOSE/APPEALS: An experienced physician/Medical Review Officer (MRO) will review all negative and confirmed positive lab reports. Positive results may only be reported to employees after the MRO has ascertained that personal prescriptions or other legal substances do not account for the lab findings. Investigations may include, as appropriate, telephone contact with the tested Driver and any prescribing physicians and/or pharmacies identified. Drivers wishing to dispute a controlled substances test result may, at their own expense, within 72 hours of notification of a verified positive test result, request the MRO to order a retest of a split of the original specimen by any SAMHSA certified lab of their choosing.

ALCOHOL TESTING/VERIFICATION: Breath alcohol testing of Drivers must be administered by a Certified Breath Alcohol Technician (BAT) using a calibrated NHTSA approved Evidentiary Breath Testing (EBT) device. Saliva alcohol testing, conducted by a Saliva Testing Technician (STT), has also been approved for initial testing. If positive by *either* method, verification testing, *only using an EBT device* must be performed, within 30 minutes, as required by Part 40.65.

CONSEQUENCES FOR INFRACTIONS: In addition to employer-mandated disciplinary consequences detailed by separate written policy, under Subpart E, Drivers violating alcohol and controlled substances prohibitions stated in Part 382, Subpart B, will be subject to regulatory constraints, including immediate removal from safety sensitive functions such as driving commercial motor vehicles. A Substance Abuse Professional (SAP) who shall determine what assistance, if any, the Driver needs in resolving problems associated with alcohol misuse and/or illegal controlled substance use must evaluate the offending Driver. The SAP shall follow the explicit instructions stated in Subpart F, § 382.605 regarding evaluation, referral, and follow up of counseling or treatment for Drivers in violation. Restoration of driving privileges after a negative Return-to-duty test is at the SAP's discretion, which could also require successful completion of treatment and Follow-up controlled substances and/or alcohol tests for up to 5 years.

EMPLOYEE ASSISTANCE PROGRAM: An Employee Assistance Program (EAP) is utilized to assist with the implementation of Subpart F -Alcohol Misuse and Controlled Substances Use, Information, Training, and Referral. The EAP also provides a free, professional, and (by Federal law) *confidential* counseling resource for employee-Drivers with problems concerning alcohol or drugs which could be interfering with their work performance and/or places them in possible violation of Federal Motor Carrier Safety Regulations. Under § 382.601 (b) (11), the EAP will provide information to employees concerning effects of alcohol and controlled substances use on an individual's health, work, and personal life; signs and symptoms of alcohol or controlled substance problems; and available methods of intervening, confronting and referring. In addition, under § 382.603, persons designated by the employer to determine whether reasonable suspicion exists to require a Driver to undergo testing under § 382.307, will receive at least 60 minutes of training on alcohol misuse and an additional 60 minutes on controlled substances abuse.

The employer's EAP is:

Total Compliance Services
3822 W 12 Avenue
Hialeah, Florida 33012
(786) 369-5969

Health Care Center of Miami
7911 N.W. 72 Avenue, Ste 111
Miami, FL 33166
(305) 888-6959

PREVIOUS EMPLOYMENT HISTORY: Under § 382.413, Driver-applicants must provide a prior employment history for a 10-year period preceding application. Drivers must also provide prospective employers with written consent to obtain information from prior employer(s) regarding all positive alcohol and controlled substances test results or refusals to test *covering a 2 year period preceding application.* The prospective employer must obtain this information, by any confidential means, within 14 days of allowing Drivers to assume safety-sensitive positions.

ACKNOWLEDGMENT: By signing below, the Driver acknowledges receiving and understanding this Policy and, under § 382.601, of having also received a copy of Federal Motor Carrier Safety Regulations. Part 382, upon which this Commercial Motor Vehicle Driver Safety Policy is based. Drivers with any questions regarding employer policies or applicable DOT Regulations are encouraged to contact the employer's DOT Information Supervisor, whose name will be posted on employee bulletin board(s) or, alternatively, the EAP may be called. This acknowledgment also authorizes all health care providers to release any information requested by the Medical Review Officer to verify prescription use following a positive controlled substances lab finding.

_____
Driver Name (Print)

_____
Driver Signature

_____
Date

Truck Driving Operations

I. Drivers Are Company Ambassadors
II. Orientation, Training and Qualifications
III. Defueling Procedures
IV. End of Duty Procedures
V. Dockside Procedures
VI. Vehicle Operation and Maintenance
VII. Retain Samples, Collection, & Storage

Drivers Are Company Ambassadors

The most important interface between Tropic Oil Company and its customers is neither the knowledgeable sales staff, nor our superb receptionists and business coordinators. Rather, it is the professionalism, courtesy, and punctuality of our truck drivers and dispatchers that leave the strongest lasting impressions on customers, potential customers, and the general public. When you wear a Tropic Oil Company uniform, those you encounter take for granted your technical competence. On the downside, all behavioral deficiencies are Company deficiencies. Consequently, the intangibles of professional deportment, a cooperative attitude, and physical appearance (including vehicle and equipment condition) resonate strongest. These are the details that separate Tropic Oil Company from its competitors. Even if Tropic Oil Company were universally perceived to distribute the highest-quality fuels, lubes, and specialties, we would ***still*** lose market share if our drivers were sloppy, rude, and tardy.

One can therefore understand why Tropic Oil Company goes to such great lengths to carefully screen, train, certify and retain drivers of the highest caliber. Tropic Oil drivers must live up to exacting standards of standardization, safety, and vocational excellence that promote customer confidence and brand loyalty.

Orientation, Training and Qualifications

New driver orientation is a critical communication and retention tool. When hiring drivers, the Company's strategic goal is to invest in them as long-term partners in customer confidence and retention. New employees are evaluating Tropic Oil Company every bit as much as we are evaluating them. There is no second chance to make a professional first impression for either party. Statistics reveal that first impressions are lasting among professional truck drivers. Thus, the first impression that we impart as a company is critical to improving retention beyond the historic 90-day drop-out point, when industry-wide, 60 percent of new driver turnover occurs.

All new employees are subject to a 3 month training period. During these 3 months the new employee is placed with the most senior driver instructors who have received instructor standardization training. The new employee is schooled in safe driving techniques, equipment operations, use of safety equipment, hose handling, fire prevention and fire extinguishers, boom deployment and correct transfer procedures as outlined in 33 CFR and our Declaration of Inspection. Additionally, on a monthly basis safety and training meetings are held for all drivers for standardization and discussion on safety procedures, orientation on new customer facilities, D.O.T. updates, and post accident and incident reviews.

Due to the high investment cost of training new drivers, Tropic Oil Company has developed a hiring, orientation, and development process called Tropic for Life (TFL). TFL is a comprehensive process of interviewing, hiring, welcoming, orienting, training, and engaging drivers for the long haul. The objectives of TFL include:

- Making new drivers feel welcome, valuable, and motivated
- Reinforcing the driver's decision to sign on with Tropic
- Mitigating the fear and uncertainty of a new job in an unfamiliar place
- Providing the driver with the standards, information and knowledge to succeed
- Partnering with drivers to improve operational and administrative procedures
- Investing in each driver's career commitment at Tropic Oil Company

The first day of a new job is rife with potential for embarrassment, from forgetting important paperwork to not knowing the rules (both stated and unspoken). Usually, any new employee hopes for a new start and a pathway to greater success and security. However, transitions are often filled with nervousness because the new employee lacks established relationships and a detailed understanding of his or her new role.

Because all drivers come with unique skills and experience levels, a tailored training program with waivers for demonstrated competence is employed. However, most administrative procedures, rules, regulations, and benefits are universal to all employees, therefore Company orientation attendance is not waiverable. Overall, the TFL process for drivers addresses five issues:

- A clear description of the job, chain of command, and performance evaluation.
- Tropic Oil Company culture; the do's and don'ts, the employee handbook, and HR.

- Monthly continuing education, standardization, and training prerequisite to safety and QA.
- Rewards and incentives tied to safety, productivity, and beneficial suggestions.
- Opportunities for long-term engagement and retention beyond service as a driver.

During orientation, the new driver will build connections with the Dispatchers and Plant Manager to ensure a productive relationship. Further, a primary Driver-Instructor should be introduced as the new driver's mentor/buddy who will be his source of information and confidential support. The TFL orientation will then shift to OJT in the warehouse for a specified period of time, depending upon experience. The first tasks are intended to be welcoming, anxiety-reducing, build professional relationships and reinforce our culture of teamwork.

From orientation to the end of the new employee probation period, the new driver is supported with ongoing communication, training, monthly drivers meetings, and reviews to help him settle in as an important, productive member of Tropic Oil Co. In the end, it's all about building a stronger team of highly qualified, accomplished drivers who will collaborate to help increase revenue (and reduce error) per truck.

Tropic Oil Co. Orientation Syllabus

- Key Personnel Introductions (including primary Driver-Instructor)
- HR benefits, time cards, employee handbook, time off, sick leave, et al.
- QA Program (safety bonuses, safety, standardization, discipline, checklists, urinalysis, surveillance cameras, etc.)
- Confirmation of CDL & essential "H" endorsement & TWIC
- Facility tour, company policies & general housekeeping
- Training Plan & Points of Contact
- Hurricane conditions employment
- Things that will get you fired (poor driving record, felony convictions, drug or alcohol abuse, permanent disability, punctuality, etc.)
- Uniforms & personal grooming

- Provide answers to new employees' questions
- Shake hands with President & CEO

Warehouse Orientation (1 Week)

- Facility Tour: both warehouses & mezzanine
- Safety & safety equipment
- Product recognition
- Repackaging techniques
- Rack orientation & safety harnesses
- Rack ladder stowage
- Spill procedures
- Retain sample rack organization & disposal
- Meter ticket procedures & log book
- Fuel additives
- Box truck loading, shrink-wrap, & pallet jacks
- Dispatcher desk & work prioritization
- Maintenance action & reporting malfunctions

Box Truck Training Syllabus (2 Weeks)

- Forklift operations
- Pump operations, cam locks, & line clearing
- Securing loads
- Tailgate functioning
- North & South delivery regions
- Pre-trip vehicle inspections
- Driver logs & hours of service
- Sales order completion
- USCG manual contents & immediate-action emergency procedures
- Cooper pile recognition (customer drum credit determination)
- Uniform & safety equipment
- Preventive maintenance, maintenance action, & highway emergency procedures
- Cargo documentation
- Vehicle competence & courtesy
- Dispatcher communications
- Local hazards
- Box truck unique emergency procedures
- Accident procedures & reporting

Tank Wagon Training Syllabus (3 Weeks)

- Pre-trip inspection (3 different models)
- Dual pumping operations
- Fueling & defueling procedures
- Parking & maneuvering
- Line clearing
- Gas in lines
- Three types of Tropic tank wagons (orientation)
- Changing compartments (multiple compartment deliveries)
- Tank wagon emergency procedures
- Comingling avoidance
- Cam locks & adapters
- Booming
- Terminal operations and evacuation procedures
- Tank wagon emergency procedures

Tractor (Transport) Training Syllabus (3 Weeks)

- 5th wheel coupling
- Landing gear use
- Weight distribution (CG)
- Inspecting hoses & flanges
- Delivery equipment (cam locks & adapters)
- Pre-trip inspections
- Routing & map reading
- Switching compartments & releasing pressure
- Multiple Tropic vehicle operations
- Road test & DOT issues
- Rack & tank farm procedures
- Yard parking
- Port procedures
- Chevron terminal training
- ISO tanks & chassis inspections
- Skid Control
- Tractor-trailer Emergency procedures

Driver-Instructor Training Syllabus (1 Meeting)

Driver syllabus review
Role & responsibilities
Trainee performance evaluations

Instructional time reporting/remuneration

Defueling Procedures

Fuel must be removed from the tanks of generators and vehicles when maintenance is to be done on their fuel systems, when the fuel level gages are to be calibrated, and when work on the system requires use of electrical equipment or other equipment that might generate heat or sparks. The tank must also be defueled if the system is to be shipped or stored. Defueling is more dangerous than fueling because, even though relatively small amounts of fuel are involved, the procedure is more difficult and drainage provisions are usually inconvenient. All Tropic Oil Company safety precautions must be observed. The general rule of defueling is that it must be done outdoors (with caution exercised to prevent damage to adjacent components or the fuel system), without fuel waste, and without safety violations. Generator and many vehicle fuel tanks must be defueled by power or by gravity. For speed and efficiency, only power defueling is done by Tropic Oil Company (this should remove most of the fuel) and only the customer or his contractor can conduct final draining by gravity.

Power Defueling

The bulk of the fuel in the vehicle's tanks should be removed by suction. A pump/engine assembly on a box truck or the pump of a refueler provides the power. The tank can be defueled either with a defueling tube or by using a flushed suction hose. Always check the remaining capacity of the refueler/defueler compartment to make sure there is adequate room to hold the product being defueled.

- Defueling tube. A defueling tube is fitted onto the suction hose. The tube is inserted into the tank and most of the fuel is pumped out.
- Suction hose. A clean/flushed suction hose may also be used to defuel a tank. If a temporary hose is used, the end that will be inserted into the tank is cut at an angle so that the reinforcing wire is cut only once. The cut end of the reinforcing wire is also rounded to keep it from damaging the fuel tank. The hose is inserted into the tank and most of the fuel is pumped out.

Outdoor Defueling Procedures

When defueling is done outdoors, general safety precautions must be followed. Defueling may be into a tank vehicle or into a certified container. Prior to starting the defuel operation, take samples of the fuel to be defueled and visually inspect for contamination (under the

observation of the customer, when possible). Determine the status of the fuel (whether it is suspect or non-suspect—a Driver responsibility). The customer requesting the defueling operation will confirm that the fuel is or is not suspect. Fuel is considered suspect if the system has malfunctioned and the fuel is believed to have contributed to the problem (or the fuel is thought to be of the wrong type). Determine the amount of fuel to be removed (Driver responsibility). Again, the client requesting the defueling operation will provide an estimate as part of the work request.

General Safety Precautions

The general safety precautions for outdoor defueling are as follows:

- Fuel tank openings must be at least 50 feet from any garage, hangar, or building. They must be the proper minimum distance from radio transmission or radar equipment.
- No vehicle, electrical equipment, open-flame device, or any other spark generator must be allowed to operate within 50 feet of gasoline defueling.
- No smoking is allowed within 50 feet of the tanks (source and receiving).
- Vehicle engines (aside from the defueler and PTO), boost pumps, and radios must be shut down.
- Only those personnel actually required to conduct the defueling operation and to operate the fire equipment are allowed within 50 feet of the tanks.
- All defueling operations must be stopped if there is an electrical storm in the immediate area or if there is a fire, fuel spill, or accident at the refueling point or site.
- The customer's quality assurance or safety officer will decide when a defueling operation warrants a fire truck and personnel present. Tropic Oil Drivers will man their own assigned fire extinguisher(s) for all defueling operations.
- Fueling and defueling operations are discontinued when visible lightning within 3 miles.

Tank Wagon Defueling

The procedures for defueling into a tank wagon are as follows:

- Drive the tank wagon into the same position as when refueling, but park it as far from the source tank as the length of the hose will permit. Park the tank wagon so that there is a clear and open route to drive away from the source tank in an emergency.

- Ground the tank wagon by connecting one clip of the ground cable to a ground connection.
- Ground the generator or source vehicle by connecting the clip at the other end of the cable to an unpainted surface.
- Unless holding it, bond the defueling tube to the tank aperture with a bonding plug or clip. A suction hose may be used if a defueling tube is not available.
- Remove the cap/plug from the fuel tank and place it where it cannot be contaminated.
- Insert the defueling tube or length of suction hose into the tank. If the tank has a drain port, attach the suction hose to the system's drain port using the required adapters.
- Start the pump and pump the fuel out. Supervise closely and shut down the pump as soon as the flow stops.
- Remove the defueling tube or suction hose from the tank, and close the tank.
- Remove the bond and reel up the hose.
- Remove the ground connection to the source tank, then the ground connection between the tank wagon and the ground rod. Store the grounding cable.
- Drive the tank wagon away after client inspection and approval.

Indoor Defueling Procedures

When a vehicle or generator is scheduled for maintenance, the fuel system may have to be drained. Whenever possible, it should be defueled outdoors before it is moved into a maintenance facility. However, during routine maintenance disassembly, an unexpected condition can be discovered that makes defueling necessary. If the generator or vehicle is in a jig or on jacks when the discovery is made, moving the system outdoors is probably impossible. All alternatives to indoor defueling should be considered, but if the client determines that indoor defueling is necessary, follow the procedures described below.

Preparing to Defuel

A number of procedures must be followed when preparing to defuel indoors. These are as follows:

- Move all systems that have not been defueled out of the facility and park them at least 50 feet away.

- Open the main doors of the facility, and close any office or shop doors that open into it. Opening the main external doors to provide maximum ventilation and allow the force of a potential explosion to dissipate.
- Turn off all engines, electrical equipment, or other possible spark sources within 50 feet. Do not start or continue the operation if there is an electrical storm in the immediate area or a fuel spill, fire, or any other emergency is present.
- Clear at least a 50 foot radius of all personnel and equipment that are not required for defueling.

Grounding

In a building, a water pipe or a buried grid usually provides the ground connection. In a tent or industrial shelter, a ground rod provides this ground connection.

Defueling

Procedures to defuel indoors are the same as those for defueling into a tank vehicle or container outdoors.

Drained Fuel Disposition

Drained fuel should be disposed of properly at the main plant in Medley.

End of Duty Procedures

At the end of your work day, you should prepare the vehicle for its next shift. The recommended procedures are listed below. They are a general guide and sound judgment must be exercised in execution. When in doubt, contact the Dispatcher.

Refuel the vehicle

If the vehicle is to be left standing overnight, the fuel tanks should be completely filled. This prevents cold, moist air being drawn in to the tank as the temperature drops, leading to water condensing and collecting in the bottom of the tank. Water in the fuel can seriously damage the injection system of a diesel engine.

Select a safe parking place

Position the vehicle in a safe parking place where it will not be a danger to plant operations or block known access points. Always try to park on level ground where there is no risk of the

vehicle moving should it be tampered with or if the brakes fail. When away from the Medley plant, choose a place where the vehicle is easily visible both day and night (a well lit and highly visible area will also lessen the risk of theft or vandalism). You should switch on the parking lights if the vehicle is parked on the road at night. Other items to consider:

- Switch off all systems
- Switch off the lights (except parking lights if needed), air conditioner, radio, etc.
- If the vehicle is fitted with a battery isolation switch and no electrical components need to be left operating, turn it off
- Air tanks should be drained several times per day to eliminate moisture, oil and other contaminants from the system. After you have parked for the night is a good time.
- Clean the cab
- Remove trash, bottles, unnecessary papers, etc. from the cab to get it ready for the next day
- Perform a walk-around check
- Walk around the vehicle and as you do so, check:

- the wheels and tires
- for leaks beneath the vehicle
- that the wheel chocks are in place
- that the load is secure and that the cargo doors are locked
- that the parking lights and reflectors are clean and that the parking lights are switched on if necessary

- Fill out log book and report problems per maintenance action procedures
- Complete your driving log for the day and complete the vehicle log noting anything unusual which has occurred
- If you have found any vehicle problem which needs attention, make a special note of it in the vehicle log and notify our mechanic or Plant Manager in writing

- Lock the vehicle, unless it is inside the plant perimeter, in which case it must remain unlocked in case of fire
- Close all windows and doors
- Leave the Bill of Lading or note of present cargo with an itemized list of each compartment's contents on the visor
- Turn in all paperwork and take retain samples to the warehouse
- Check mailbox & white board for messages and possible morning delivery schedules
- When all else is completed, clock out

Dockside Procedures

These procedures augment those contained in your Coast Guard manual and they should be exercised in concert with sound judgment.

Refueling Vessels

In most cases there is direct voice communications between our Drivers and the ship's P.I.C. In the event radio communications are necessary, the radios are supplied by the ship. The ship's P.I.C. and our Drivers are required to ensure that the radios are intrinsically safe.

Drip containment receptacles are carried on all vehicles and are to be placed at all connections of hoses and pumps. Any product captured is transferred to a sealable five gallon container and returned to the plant for disposal. Furthermore, each trailer is equipped with oil absorbent pads and/or booms.

NOTE: The emergency shutdown equipment on each trailer/tank wagon enables the Driver to stop operations immediately in the event of an emergency. The Driver is required to position himself where he can best communicate AND effect an emergency shutdown.

Marine Safety Procedures

All Tropic Oil vehicles carry two 12' long by 17" wide flexible booms and at least one bundle (bag of 100 count) of absorbent pads for use in day-to-day operations. Drip containment receptacles are carried on all vehicles and are to be placed at all connections of hoses and pumps. These receptacles under the hose connections must be of sufficient capacity. Any product captured is transferred to a sealable 5 gallon container and returned to the plant for disposal.

Oil Spill Response Organizations (OSROs) play an integral role in Tropic Oil Company's planned response to any dockside oil spill incident. The OSRO (Cliff Berry Inc.) is contracted to be at the scene of booming delivery. From the moment a hazardous spill is reported or a service is requested, Cliff Berry, Incorporated mobilizes its hazardous materials personnel to respond to the situation. The OSRO team assesses the situation and determines the best course of action to solve the problem safely and effectively. They are able to remediate oil and chemical releases, but the Tropic Oil Driver(s) are expected to assist at their direction if an incident occurs.

Prior to transferring product, the driver (P.I.C.) contacts the vessel's Chief Engineer, or his representative. Together they will fill out the Declaration of Inspection and discuss product quantities, descriptions, and available tank space (ullage). After hoses are connected and the containment receptacles are in place, the driver walks the length of the hose to double check that there is no obstruction and/or loose connections. Once the driver has established direct communications with the ship's P.I.C., he opens the valve and engages the power take off (PTO) to begin the pumping operation. (Note: Warning signs are displayed in ports where required.)

When the pumping operation is completed, the ship's P.I.C. caps the hose and lowers it back to the driver. The driver will then load his equipment back on his truck and has the requisite paperwork signed off.

In case of emergency, the driver is instructed to act safely and professionally to minimize injury to himself, surrounding personnel, the environment, and his equipment. Immediately following his best effort to get the situation under control, he is to consult Section 7 of his onboard USCH manual to notify the proper authorities.

In case of an oil discharge:

1. Stop pumping procedure immediately, shut down source of leak/spill by employing Emergency Shutdown Procedures
2. Contain spill immediately using booms in the water and absorbent pads on the dock to plug scuppers and storm drains.
3. Notify receiver of product of emergency situation
4. Notify appropriate personnel listed in Emergency Contact List, then notify the Tropic Dispatcher.

Vehicle Equipment

1. Each truck has 2 fire extinguishers
2. Each Extinguisher is type BC
3. The location for each is inside the cab and on trailer
4. Instructions for use:
    a) Pull pin in handle, hold upright
    b) Stand back 8 feet from flame
    c) Aim at base of fire, squeeze handle, use sweeping motion
5. Warning signs are to be displayed during coupling, transfer, and uncoupling.
6. All transfer hoses are to be marked on one of the stainless steel bands (or stenciled on the hose proper) with an identifying number.

Florida Department of Environmental Protection

Hazardous Waste Facility Compliance History

Activity History Listing

Activity History for:

EPAID: FLR000217265, Tropic Oil Company

Note: ETA links to Enforcement Tracking Activity

Date Done	Activity Type	Activity Comments	ETA Link
11/10/2015	Site Inspection	Complaint; CESQG (<100 kg/month) - Complaint; VSQG (<100 kg/month) - Complaint; Used Oil-Other	
12/8/2015	Department Comments	Finished-12/08/2015	
7/22/2016	Project Closed Letter	Generated for PROJECT CLOSED LETTER-12/03/2015 - Finished-07/22/2016	

This pulls the Violation History

Violation History

Vio#	Area	Regulation	Opened By	Date Determined	Completed	ETA	Act	Act Date	Regulation Text Excerpt (mouse over for more text)
1	273.B	273.13(d)(1)	Gierczak_M	11/10/2015	11/10/2015		176523	11/10/2015	A small quantity handler of universal waste must contain any lamp in containers or packages that are structurally sound, adequate to prevent breakage, and compatible with the contents of the lamps. Such containers and packages must remain closed and

Kantor, Karen E.

From: Perrigan, Glen
Sent: Thursday, December 3, 2015 3:49 PM
To: Kantor, Karen E.
Cc: Gierczak, Magdalena; Smith, Jennifer K.; Scarborough, Jill R.; Bahr, Tim
Subject: RE: Request for Case Classification Review - Tropic Oil EPA ID#TBA
Attachments: CaseReview_Tropic Oil.pdf; Tropic oil guidelines.xlsx; Tropic Oil IR draft.pdf

Karen,
The Division has conducted a case specific classification review for Tropic Oil and concludes that an enforcement response is not appropriate at this time.

Glen Perrigan
Environmental Manager
Waste Compliance Assistance Program
2600 Blair Stone Road, MS4560
Tallahassee, FL 32399-2400
glen.perrigan@dep.state.fl.us
850-245-8749

From: Kantor, Karen E.
Sent: Thursday, December 03, 2015 10:30 AM
To: Perrigan, Glen <Glen.Perrigan@dep.state.fl.us>
Cc: Gierczak, Magdalena <Magdalena.Gierczak@dep.state.fl.us>; Smith, Jennifer K. <Jennifer.K.Smith@dep.state.fl.us>
Subject: Request for Case Classification Review - Tropic Oil EPA ID#TBA

Glen: please find attached the documents for a case classification review for a complaint inspection.

Maddie: ok to submit for approval pending DWM review.

From: Gierczak, Magdalena
Sent: Thursday, December 3, 2015 10:13 AM
To: Kantor, Karen E. <Karen.E.Kantor@dep.state.fl.us>
Subject: Tropic Oil Complaint - Case Review Docs

Please see attached.

IR draft not yet submitted for approval but all adjustments implemented as suggested.

Magdalena Gierczak, MS
Environmental Specialist III
Hazardous Waste Division
Florida Department of Environmental Protection

3301 Gun Club Road
MSC 7210-1
West Palm Beach, FL 33406
E-Mail: Magdalena.Gierczak@DEP.State.FL.US
Phone: (561) 681-6718
Fax.: (561) 681-6755

Florida Department of

Environmental Protection

Hazardous Waste Inspection Report

FACILITY INFORMATION:

Facility Name: Tropic Oil Company

On-Site Inspection Start Date: 11/10/2015 **On-Site Inspection End Date:** 11/10/2015

ME ID#: 118865 **EPA ID#:** FLR000217265

Facility Street Address: 10002 NW 89th Ave, Medley, Florida 33178-1409

County Name: Miami-Dade

NOTIFIED AS:

N/A

INSPECTION TYPE:

Complaint Inspection for CESQG (<100 kg/month) facility

Complaint Inspection for Used Oil facility

INSPECTION PARTICIPANTS:

Principal Inspector: Magdalena Gierczak, Inspector

Other Participants: Osvaldo Roche, Dispatcher; David Gurney , VP of Operations

LATITUDE / LONGITUDE: Lat 25° 51' 55.5768" / Long 80° 20' 32.1252"

SIC CODE:

TYPE OF OWNERSHIP: Private

Introduction:

A complaint investigation was performed at Tropic Oil Company (TOC) on 11/10/2015. The complaint alleged improper disposal of oil-saturated absorbents. Potential violations of OSHA regulations were also alleged in the complaint, for which the complainant was advised to file directly with OSHA.

TOC is a bulk distributor for oil and petroleum lubricant products. The company was established in 1952, and has been operating at this location since 1995.

The Tropic Oil compound is located on a 236,966 Sq.Ft lot which houses TOC's corporate offices (16,418 Sq.Ft 2-story building), a tank farm (42 tanks, largest tank capacity is 30,000 gallons), and three large warehouses stocked with lubricants as well as fuels for a variety of applications in the commercial, industrial, aviation and marine industries.

TOC has its own rail spur, enabling it to receive up to five 23,000-gallon rail cars of bulk oil simultaneously.

TOC currently employs about 30 employees and uses city utilities.

INSPECTION HISTORY:
- facility has never been inspected by the SED FDEP

VIOLATION HISTORY:
- no violation history on file

Process Description:

TOC is a bulk distributor for oil and petroleum lubricant products. Tropic Oil Company owns its

own truck fleet and performs basic maintenance of their trucks on site. Major repairs are outsourced to off-site vendors.

The following waste streams are generated from occasional tank clean-out and routine vehicle maintenance operations:
- used oil - stored in one (1) 300-gal AST, located inside the service building, sheltered from elements, on impervious surface; properly closed and labeled at time of inspection; managed by Ricky's Oil
- used oil filters - stored in one (1) 60-gal plastic bin, located inside the service building, sheltered from elements, on impervious surface; properly closed and labeled at time of inspection; managed by Ricky's Oil
- oily water - stored in one (1) 175-gal tote, located inside the storage building, sheltered from elements, on impervious surface; properly closed and labeled at time of inspection; managed by Ricky's Oil
- oily absorbents - granular and cloth (rags, pads, socks) stored in one (1) 55-gal drum, located inside the service building, sheltered from elements, on impervious surface; properly closed and labeled at time of inspection; managed by Jam Environmental Services
- spent parts washer solvent - generated from one (1) 10-gal parts washer, located inside the service building, sheltered from elements, on impervious surface; properly closed and labeled at time of inspection; waste is mixed with oil; CESQG amounts; tracking record provided via e-mail on day of inspection

At time of inspection seven (7) intact mercury-containing lamps were observed discarded with non-regulated solid waste. Operator removed the lamps from trash bin and placed them inside a cardboard box with proper labels provided by the inspector.

Operator was advised on proper spent lamp management, handling, storage and disposal regulations and agreed to obtain a contract with appropriate handler/transporter to ensure proper future disposals.

New Potential Violations and Areas of Concern:

Violations

Type:	Violation
Rule:	273.13(d)(1)
Question Number:	39.10
Question:	Are lamps managed in a manner to prevent breakage or the release of universal waste or components of universal waste and are the packages or containers structurally sound, adequate to prevent breakage, and compatible with the contents of the lamps?
Explanation:	Seven (7) 4' lamps were observed discarded with non-regulated solid waste.
Corrective Action:	Operator placed the lamps in a closed, properly labeled box awaiting proper disposal. Violation was resolved at time of inspection.

Photo Attachments:

Before

After

Conclusion:

Facility was inspected for HW, UW and UO requirements. Operator provided proper disposal records for all petroleum wastes generated on site.
The facility appeared to be properly collecting oily absorbents and oily rags in compliant containers, and had documentation demonstrating proper disposal/recycling. The inspector did not observe any improperly discarded oily absorbents in the trash, or evidence of past improper disposal (no staining or residues).
Complaint was determined to be invalid.
The complainant was provided with OSHA contact information to follow up with alleged violations occupational safety and health violations.

Signed:

A hazardous waste compliance inspection was conducted on this date, to determine your facility's compliance with applicable portions of Chapters 403 & 376, F.S., and Chapters 62-710, 62-730, 62-737, & 62 -740 Florida Administrative Code (F.A.C.). Portions of the United States Environmental Protection Agency's Title 40 Code of Federal Regulations (C.F.R.) 260 - 279 have been adopted by reference in the state rules under Chapters 62-730 and 62-710, F.A.C. The above noted potential items of non-compliance were identified by the inspector(s).

This is not a formal enforcement action and may not be a complete listing of all items of non-compliance discovered during the inspection.

Magdalena Gierczak	Inspector
PRINCIPAL INSPECTOR NAME	**PRINCIPAL INSPECTOR TITLE**
PRINCIPAL INSPECTOR SIGNATURE	11/23/2015 **DATE**

Supervisor: Karen Kantor

NOTE: By signing this document, the Site Representative only acknowledges receipt of this Inspection Report and is not admitting to the accuracy of any of the items identified by the Department as "Potential Violations" or areas of concern.

TROPIC OIL COMPANY

Mobil™

August 6, 2018

Department of Port Everglades
Business Administration Division
Enterprise Director of Administration
1850 Eller Drive
Fort Lauderdale, Florida 33316

Subject: Developing growth in Port Everglades

Dear: Mr. Jorge Hernandez

Tropic Oil Company just celebrated it's 66th Anniversary as an ExxonMobil Distributor of fuels and lubricants throughout central and southern Florida. Our relationship with Port Everglades goes back over 45 years and during those years Tropic Oil has grown along with Port Everglades. Tropic Oil Company is one of the Port's largest delivery agents of fuel and lubes for shipping traffic in Ports Everglades, Miami, Palm Beach, Canaveral, Jacksonville, and Tampa.

Along with our partners, Exxon Mobil & Shell Oil, Tropic Oil Company has developed relationships with the largest cargo and cruise operators within Port Everglades. More than few of these were developed decades ago; accounts such as Princess, Carnival, Holland America, and Royal Caribbean underline commercial confidence that our commitment to safety, quality assurance, and customer satisfaction is second to none.

Sincerely,

Osvaldo F. Roche
Plant Manager, Tropic Oil Company
Miami, Florida

U.S. Department of Homeland Security
United States Coast Guard

Commander
United States Coast Guard
Sector Jacksonville

10426 Alta Drive
Jacksonville, FL 32226-2302
Phone: (904) 714-7500

16610/FAC 17-027

OCT 3 0 2017

Tropic Oil Company
Attn: David H. Gurney
10002 NW 89th Avenue
Medley, FL 33172

Dear Mr. Gurney:

We have determined the Operations Manual you submitted on June 19, 2017, meets the requirements of the Oil Pollution Act of 1990 and Title 33 Code of Federal Regulations § 154, and is hereby examined by the Coast Guard.

As a reminder, your Operations Manual is voided if the facility operator amends the manual without following the procedures outlined in 33 Code of Federal Regulations § 154.320, fails to amend the manual when required by the Captain of the Port (COTP), or notifies the COTP in writing that the facility will be placed in caretaker status.

If you have any questions, contact our Facility Inspections Branch at (904) 714-7500 ext. 7760.

Sincerely,

P. C. BURKETT
Commander, U.S. Coast Guard
Chief, Prevention Department
By direction

U.S. Department of Homeland Security
United States Coast Guard

Supervisor
United States Coast Guard
Marine Safety Detachment
Port Canaveral

9235 Grouper Road
Cape Canaveral, FL 32920
Phone: (321) 784-6780
Fax: (321) 784-7694
Email:MSDPortCanaveral@uscg.mil

16610
September 05, 2014
MSD 14-052/ 4968640
FIN SYS- 100086121

Tropic Oil Company
Attn: Michael A. Corr
10002 NW 89 Ave
Miami, FL 33178

Dear Mr. Corr:

We have determined the Operations Manual you submitted meets the requirements of the Oil Pollution Act of 1990 and Title 33 Code of Federal Regulations § 154, and is hereby examined by the Coast Guard.

As a reminder, your Operations Manual is voided if the facility operator amends the manual without following the procedures outlined in 33 Code of Federal Regulations § 154.320, fails to amend the manual when required by the Captain of the Port (COTP), or notifies the COTP in writing that the facility will be placed in caretaker status.

If you have any questions, contact Marine Safety Detachment Port Canaveral, FL at (321) 784-6780.

Sincerely,

S. E. WEST
Lieutenant Commander, U.S. Coast Guard
By Direction of the Captain of the Port

MARINE DELIVERY OPERATIONS MANUAL

(Local, State and federal regulations supersede this manual)

TABLE OF CONTENTS

1 INTRODUCTION

1.1 About this Document

This document describes Tropic Oil Company's minimum requirements and expectations for employees who deliver fuel and lubricants to marine vessels. These delivery procedures are informed by Tropic Oil Company's Quality Assurance SOP and also comply with all applicable legislative or regulatory requirements. Where there is any inconsistency or conflict between the various standards, regulations or requirements in this document or between the provisions of this document and any applicable legislative or regulatory requirements, the more stringent requirements must be applied. Nothing in this document shall be interpreted as requiring employees to act in non-compliance with any applicable legislative or regulatory requirement(s).

This document focuses on requirements at the point of delivery (both bulk & packaged), specifically, transport/tankwagon/boxtruck to ship transfers.

1.2 Statement of Business Principles

Since 1952, Tropic Oil Company has insisted on honesty, integrity and fairness in all aspects of business and expects the same from all employees, contractors, and business partners. The direct or indirect offer, payment, soliciting or acceptance of a bribe in any form is wholly unacceptable.

1.3 Health, Safety and the Environment

Tropic Oil Company observes a Health Safety & Environment (HSE) policy that has a systematic approach to ensure compliance with the law and to achieve continuous improvement. This involves identifying Health Safety and Environment hazards, assessing the risks, implementing effective controls, and putting in place recovery measures in case of controls failure. Well-understood procedures – that meet minimum requirements stated herein - are in place to minimize health safety and environment risks. The elements of a Tropic's HSE management system framework are summarized under the following headings:

- Demonstrable Management Leadership, Planning, Commitment and Review
- Policy and Strategic Objectives
- Organization and Responsibilities

- Hazards and Effects Management Process
- Standards, Procedures and Document Control
- Employee Training
- Implementation, Monitoring and Corrective Action
- Audit

1.4 Staff and Personnel

Training and staff competence:
Before being allowed to load/discharge or operate any road vehicle, marine vessel, crane, or forklift truck, delivery personnel must be:

- Fully trained in the safe handling of petroleum products;
- Aware of safety precautions and standard operating procedures (QA SOP); and
- Tested to ensure a sound knowledge of the safety precautions and operational procedures

The Vice President, Quality Assurance must ensure:

- The training records of all personnel involved in such loading / discharge activities are maintained.
- Drivers, crane operators, and forklift operators only operate vehicles for which they have been trained and certified.
- All operators are fully trained and competent in the tasks they are to perform and appreciate the need for the prevention of spillage, injuries, and protection of health.

Drugs and Alcohol

Tropic Oil Company an active drug and alcohol policy, located in the employee handbook which:

- Identifies drug/ alcohol abuse through pre-employment screening;

• Includes routine medical examinations and automatic testing of all personnel involved in delivery operations and at the time of any HSE incident;

• Includes random testing for HSE critical staff;

• Specifies consumption limits, periods of abstinence, and maximum allowances;

• Provides awareness programs for all personnel; and

• Assures the chain of custody of any samples

Working Hours

Personnel fatigue is often a contributory factor to major health safety and environment incidents. Supervisors and Dispatchers are charged to minimize fatigue by managing the working hours and rest periods of all personnel under their purview. Maximum shift lengths, rest and recovery periods, staff rotation and shift hand-over requirements must be strictly enforced.

1.5 Standard Terms and Conditions

Sale of product

Products are sold to the customer subject to Supplier's Terms and Conditions.

Risk & title: Bulk Deliveries

Risk and title of marine lubricants passes to the buyer, once the product passes the flange connecting the delivery facilities to the receiving facilities provided by the vessel.

Risk & title: Package Deliveries

Risk and title of marine lubricants in packages passes to the buyer, upon connection of ships lifting gear, if such gear is used, or when the lubricant passes the ship's rail, or when the Delivery Receipt is signed on behalf of the buyer, whichever is sooner. Title changes when the ship's personnel or representative takes control of the product.

1.6 Agents

The Customer's accredited representative in a port is the vessel's Agent as advised at the time of nomination. If Supplier has not provided the Agent's name, the Marine Department should confirm the Agent by contacting the Port Authority.

It is usually the Agent's responsibility to:

- Advise the Marine Department of the vessel's final Estimated Time of Arrival
- Provide any relevant information i.e. size and type of hose couplings, location of the vessel, and length of stay.

The Marine Department must:

- Maintain close contact with the local Agent at all times for schedule changes.
- Maintain a log of communications with the agent for each vessel delivery.

2 DELIVERY PROCEDURES

2.1 Delivery Vehicles

All vehicles, regardless of size, employed to carry out deliveries must have been positively vetted by an inspector and found suitable for the intended purpose. Suitability for employment is required prior to use. The assessment of suitability is carried out in accordance with the supplier's individual requirements (DPIM or DPQA). All delivery vehicles used for Supplier's delivery activities must be approved for use and comply with Federal, State, and Local standards, relevant DOT regulations, and be designed and equipped for local environments and intended range of operations.

These requirements include:

- The compulsory fitting and use of seatbelts;
- Vehicles being fully roadworthy, safe, and in good clean condition;
- Vehicles complying with all local transport legislation;
- Regular vehicle safety checks and inspections;
- Pumps achieving maximum transfer rates without any leaks;

• Bulk road vehicles being capable of delivering petroleum products without cross contamination between grades;

• Journey management systems monitoring driving/resting hours, speed violations etc.;

• Route hazards identification;

• Drivers holding appropriate licenses, TWIC, and Port ID passes;

• Periodic driver medical examinations;

• Driver training in defensive driving techniques and safety awareness;

• Incident and near miss reporting; and

• Safety meetings with drivers.

2.2 Bulk Delivery Procedures

2.2.1 Declaration of Inspection(DOI) and Pre-Delivery Safety Checklist

Before commencing transfer operations, the Tropic PIC and nominated receiving vessel representative must discuss, agree, and document the completion of mandatory safety checks and precautions, and confirm details of the actual transfer operation. Gratuities must not be paid to Masters, Chief Engineers or other Officers and the VP of Operations (via the Dispatcher) must be advised immediately of any such activity.

Declaration of Inspection (DOI)

When the vessel is moored at the product delivery point, the lead driver, or person in charge of transfer operations under 33 CFR 154.710 (PIC), must confirm the following information with the nominated receiving vessel's Chief Engineer or Authorized Representative (PIC);

Before conducting the transfer,

• The specific product(s) name and quantity of product(s) required. All verbal & written communications should reflect the **actual product name** as indicated in the Supplier's Safety Data Sheet (SDS) and delivery nomination;

• The order in which they are to be supplied;

• The type of hose connection (fittings required) and length of hose required; and

• The rate and pressure at which product should be pumped.

The above items must be confirmed by completing the Declaration of Inspection (see Appendix B for specimen DOI). In completing the DOI, the following points should be noted:

• The Receiving Vessel's Chief Engineer or Authorized Representative in charge of the receiving operations must be requested not to close any valves during the operation without giving ample warning to the personnel operating the delivering vehicle or pump. In the event of such warning not being given in sufficient time, the receiving ship is solely responsible for any damage caused by excess pressure to Tropic Oil Company's delivery equipment or any resulting spillage or overflow of oil or fuel.

• The statement regarding declaration of responsibility for premature closing of the ships valves must be completed by the Chief Engineer or Authorized Representative

• The signature of the Chief Engineer, or Authorized Representative, must be obtained, in duplicate, on the completed DOI;

• The form should be carefully completed and signed before delivery commences, and care taken in carrying out the customer's instructions;

• The duplicate signed copy should be handed to the Chief Engineer or his Authorized Representative who signs the form;

• If the vessel's requirements are altered, the DOI must be amended and the amendment initialed by the master or his representative; and

• The original of this form should be kept for a period of 1 years or as required local regulations.

Pre-Delivery Checklist

The responsibility for ensuring the safety of transfer operations is a joint one shared between the Supplier, Tropic Oil, and the receiver (Customer). In order to facilitate a safe and effective delivery operation, a Predelivery checklist shall be employed prior to commencing product transfer.

The following requirements apply:

• The VP, Quality Assurance shall ensure that all personnel are trained to meet the requirements of the Pre-delivery checklist.

• The PIC and the Chief Engineer or Authorized representative must jointly complete the checklist confirming that they both comply with its requirements;

• The signature of the Chief Engineer, or Authorized Representative, must be obtained, in duplicate, on the completed Pre-delivery Checklist form.

• The joint declaration must not be signed until mutual assurance is guaranteed;

• The original completed checklist should be kept by the Marine Department for a period of 3 months, or as required local regulations.

• If the vessel's requirements are altered, the requisition form must be amended and the amendment initialed by the Master or his representative.

Appendix C contains a specimen Pre-Delivery Checklist.

Appendix D contains detailed guidance for completing this form.

2.2.2 Hose Connections

The Chief Engineer or his representative is responsible for identifying the point of delivery and connections for each grade of fuel and lubricant. If the connections are incorrectly identified, any resultant contamination is the responsibility of the vessels' owners, as per the in Standard Terms and Condition of Sale.

Tropic Oil may provide the adapters necessary to make a secure hose connection to the vessel's reception facilities. In the event that product connections are considered unsuitable, the PIC may refuse to begin delivery until suitable

connections are provided and, after consulting with Dispatch or the Marine Department, point out that any additional expenses incurred are the customer's responsibility.

In making hose connections, the following requirements apply:

• Hoses should be properly fitted and rigged to prevent strain and stress beyond design limitations.

• Lifting/bridging gear on the vessel or on shore should be used to support hoses and to assist in connecting.

• Excessive weight on the ship's manifold should be avoided, however, Tropic personnel are only required to advise this, not to board the vessel and inspect.

• Flange connections should be fully bolted and cam lock levers secured.

• All hoses used shall have been pressure-tested within the past 12 months and properly logged in the Tropic Coast Guard manual.

• Hoses shall be tagged/identified to match testing documentation. Documentation shall include Maximum Allowable Working Pressure, date of manufacture, and the latest required test date.

2.2.3 Hose and Pump Grade Sequence and / or Dedication Lubricants

When more than one grade of lubricant is delivered, the compatibility requirements set forth by the appropriate Supplier Member must be followed. Sensitive oils must be kept separate from incompatible oils by using dedicated tanks, hoses, and pumps. Supply should be in drums or separate vehicles if segregation cannot be guaranteed. Common pumps and delivery hoses may be used when several diesel engine oils (e.g. system and cylinder oil, but **EXCLUDING ZINC FREE OILS**) are delivered in bulk. To minimize cross-contamination, drain hoses and flush pumps frequently between grades, and fill with the **most viscous** (thickest) oil last.

Lubricant Grade Segregation

While some grades of marine lubricant may tolerate minor contamination by other grades, sensitive oils may be rendered unusable by cross contamination at levels as low as 2ppm. When stored and delivered in bulk, each grade must be securely segregated from other grades.

A guide to the intercompatiblity of marine lubricants and sensitivities of each grade is provided by the applicable Supplier.

2.2.3 Invitation to Witness Measurement and Sampling

The Chief Engineer or his representative must be invited to:

• Witness meter readings or, where no meter is used, the measurements of the road tanker compartment(s) by "sticking" the compartment(s).

• Check the sampling procedures, and witness sealing of all retain samples.

2.2.4 Typical Delivery Procedure

The following operational steps must take place in a typical delivery procedure:

• Agree to the sequence and grades to be delivered with a responsible ship's officer.

• Ensure the officer identifies the correct onboard connection(s) for the product(s) to be delivered.

• Delivery arm, hose flanges, and delivery vessel manifold flanges should be connected by bolts. All bolt holes should be used and presentation flanges correctly aligned/orientated.

• Ensure ship's officer is offered the opportunity to witnesses the meter reading or the vehicle/shore tank "stick" if no meter is used, and document whether or not the offer is accepted.

• Ensure the ship is aware of the quantity of product to be delivered.

• Ensure:

- Delivery hose(s) that are only handled as far as the side of the ship are correctly connected to the ship's product tank by seeking specific assurances from the ship's crew.
- That confirmation is received from the ship's crew that valves are open on the ship.
- Safe flow rates or pressures are not exceeded.
- Ship's crew stands-by to check the reception tank does not overflow
- Samples are taken (refer to section on Sampling)
- Pump is switched off when the correct quantity has been delivered.
- Hose is drained into the ship's tank or the delivery tank as planned.
- Signatures and stamp(s) for receipt are obtained.

2.3 Package Product Deliveries

As with bulk deliveries, the Tropic PIC and nominated receiving vessel officer must discuss, agree and document the completion of mandatory safety checks and precautions, and confirm details of the actual transfer operation. The following documentation and checks must be completed prior to commencing product transfer:

- Masters Requisition (or DOI), and
- Pre-Delivery Safety Checklist.

Details are given in sections 2.1 & 2.2 of this document, and in ***Appendices A, B, C & D.***

2.3.1 Packed Product Handling

For deliveries solely of packed lubricants, the Tropic PIC must deliver the products to the point nearest to the vessel if the vessel is unable to berth alongside a jetty accessible to the Tropic vehicle, or remains at anchor. Any additional delivery costs are to be passed on to the supplier.

Vehicle unloading

All staff involved in handling drums and packages must have received training in manual handling techniques including hazards associated with handling half-empty drums. To prevent drums and packages being damaged by hitting the ground, handling aids including forklift trucks, power or manual hoists or wooden skids should be used. Tropic box trucks that are regularly used to deliver drums and packages shall be fitted with an electrohydraulic tail lift.

Pallets

Flat timber pallets should allow four-way entry by forklifts. Only new, not reconditioned pallets are suitable for marine deliveries. Damaged pallets must be scrapped. Pallets handled by crane should only be lifted if they have an attachment suitable for the pallet design.

Forklift trucks

The preferred method for offloading drums or packages is by forklifts. Forklifts should have a safe working load applicable to the operation that must not be exceeded, and must only be driven by authorized staff. Riding on the pallet or forklift points is not permitted. Any "lifting accessory" used on a forklift, such as an extension boom or sleeves, must either be specifically designed or certified by an engineer for use with that forklift.

Pallet jacks/trucks

These are hand operated and allow the user to pick up and transport a loaded pallet over a level surface.

Free rolling

Drums should **never** be allowed to roll freely down a slope as they gain speed rapidly (particularly when full) and may injure personnel, cause damage to walls and buildings, or damage the product & other drums.

Controlled rolling

Drums may be rolled over a short distance if there is no other way of handling them. Before rolling they should be protected against rough ground by the use of wooden stringers or wooden rails.

2.3.2 Pumping Drums into Vessel Tanks

Some port authorities do not permit the pumping of product from drums into vessel tanks, as it increases the risk of spillage. However, there are occasions when it may be necessary to undertake this procedure, and the following requirements apply:

- The number of drums must be kept to the minimum and should be inspected for leaks before lifting.
- There must be written procedures detailing the operation issued to all staff involved.
- The operation must be supervised and carried out with adequate supplies of absorbent materials readily available.
- The pump must be flushed with the product being pumped and drained.
- All other openings on the vessel should be secured and all nearby sources of ignition prohibited.
- When transitioning from the evacuated drum to the next drum, every effort must be made to limit the amount of spillage.
- As soon as each drum is emptied their bungs must be securely fitted and product on the top of drum absorbed with rags (which must be disposed of properly).
- At the end of the operation, all drums must be inspected to ensure their bungs are secured and then removed from the vessel.
- The pump must be drained into the last drum before it is removed from the vessel.
- Adequate personal protective equipment shall be worn, including goggles, impervious apron, and gloves / gauntlet.

2.3.3 Precautions during Loading of Drums and Packages onto a Vessel

Drum and hose lifting operations are a major hazard and sources of serious injury and fatalities.

Additional Pre-Delivery checks (refer Appendix C) are necessary for lifting operations involving cranes. The following steps are essential if these risks are to be kept as low as reasonably practicable.

• Cranes, lifting blocks, slings, wire ropes and other lifting tackle are usually subject to specific local legislation, which must be complied with.

• Every crane and lifting block must have the maximum working load marked clearly on it and this must not be exceeded.

• Heavy loads must never be left suspended on a crane and lifting operations should not take longer than necessary.

• All chains, rings, hooks, slings, ropes, etc., must be inspected by a responsible person before use.

They must be tested every six months and records kept.

• Any parts of lifting equipment which show signs of wear which may endanger personnel should not be used until certified safe.

The handling of packaged petroleum products must be planned, supervised and carried out in a safe manner to prevent risk of injury—primarily—from equipment or the load falling or striking those involved.

Crane lifting operations

• Cranes may only be operated by designated and trained personnel.

• Fiber rope slings, cargo nets or drum hooks on wire rope or chain slings should be used for handling loose drums.

• Drums should be palletized and secured. Pallets should be lifted with pallet lifting gear with safety nets.

• If drums are not presented on pallets, cargo trays or fiber rope slings may be used. Cargo nets are liable to cause damage.

• During lifting operations, all staff involved must not stand directly under the lift or load at any time, but stand at a remote safe distance.

• Drums and packages should not be dragged across the deck of the vessel and should not be allowed to slide or roll free.

Use of (third party) cranes

• Extra precautions and care should be taken when the client finds it is necessary to use third party cranes or lifting equipment.

• If necessary, make a trial lift and landing.

• If there is any doubt over the suitability and condition, the equipment must be checked by a competent person before use.

Handling of Small Packages

For small packages (containers up to 25 liters) for regular operations, standard flat deck pallets should be used. Pallets used to store, lift or transport packaged products must be adequate in size for the load they are expected to carry. Loaded pallets can be handled by forklift truck. Wing type pallets should only be used when the full pallets have to be lifted by crane onto vessels or barges.
The stacking of all plastic containers (even in cardboard boxes) should be limited to no more than 2 meters in height; they should be separated from other products, and kept under cover.

2.3.4 Drum Storage

Drum Secondary Containment

• All containers of 55-gallons or more that contain product must be stored in accordance with all applicable local, state & federal regulations.

Drums on pallets

• Stacked drums should have a pallet, sheet of plywood, or stringers between each layer of drums.

• Approved stacking patterns should be used to ensure stability of pallet loads.

• If pallet loads are stacked on each other, the defined limit on the number of layers is three. There should be adequate head space between the top drum and the warehouse ceiling or other overhead obstructions. Drum pallets should be suitably stacked according to applicable regulations and supplier policies.
• Adequate supplies of absorbent materials should be co-located with all drum and package storage.

Horizontal stacking

• Drum stacking should be undertaken in an area designed to contain any spillage.
• Full drums should be stacked horizontally only when mechanical means for stacking are not available.
• Depending upon ground conditions, horizontal stacks should not exceed two layers in height.
• All layers should be separated by wooden runners including the bottom layer.
• Runners should be not less than 2 meters in length and adjoining lengths should overlap by at least one drum space. Only wooden chocks should be used for restraining end drums.
• Bungs should be fully tightened and aligned in the horizontal plane so as to reveal leaks should the bungs become defective.
• Drums should be un-stacked carefully to avoid damaging them.
• Where drums are expected to be stored for a long period they should be kept under cover.

Off-Spec, outdated and/or damaged drums

• Off-spec, outdated, or damaged drums shall be segregated and quarantined

2.4 Management of Hoses

Type of Flexible Hose

Hose types for oil service are detailed in the International Safety Guide for Oil Tankers and Terminals (ISGOTT). Delivery hoses should conform to Coast Guard regulations or equivalent recognized standards and is of a grade and type suitable for the service and operating conditions of use.

Care of Hoses

Hose strings should be of sufficient length to safely allow for the rise and fall of the ship and must be suitable for the product to be delivered. Hoses should be:

- In good condition, visually checked prior to use, properly fitted and rigged.
- Fitted with end covers when not in use.
- Moved by rollers, dollies or cranes using spreaders.
- Used with chafing mats or other protective material when necessary.
- Fitted with the correct gaskets / washers to prevent leakage.

Hoses must not be:

- Put into forcible contact with the ship's side and deck, particularly at the ship's rail where the hose may bend through 90° towards the ship's receiving connection.
- Left lying in pools of water/petroleum products or dragged or rolled;
- Stored until they have been drained completely and kept clean and free from oil externally.

Inspection of Delivery Hoses

A Hose Record shall be kept by the Plant Manager, detailing the dates of hose purchases, manufacturer, and all testing records.

- All hoses or hose ends shall be marked or stamped for easy identification during testing.

Markings should clearly identify the hose test status, and where the test or operations have resulted in failure, the hoses must be marked accordingly, and scrapped.

• All hoses must be visually inspected by a PIC prior to each use and pressure tested at intervals not exceeding twelve months.

• All hoses in operation must have current test records.

• A hose must be rejected when the external examination shows:

- Severe kinks, shown by a hinge action when the hose is lifted or permanent deformation of the hose body
- Exposed carcass with broken reinforcing wires or torn fabric
- Severe corrosion of reinforcing wires or nipples by exposure to sea water
- Damage, wear or abrasion to the cover
- Cracks in flanges or sample nipples

For additional guidance refer to ISGOTT

Testing of Delivery Hoses

Hoses must be tested annually according to the applicable regulatory requirements. When contractors are used for hose testing they must be informed of the standards and procedures required.

Draining of Delivery Hoses

After completing a delivery operation, the contents of the delivering hoses should be drained into the receiving vessel's tanks or back into the supply vessel or road tanker to ensure product spillage does not occur during disconnection. Blank flanges must then be fitted and fully bolted and loading arms securely stowed. Hoses should be drained before the final delivery measurement is taken. Where delivery is metered, the metering unit should be isolated before draining back the contents of the hoses through the by-pass provided, unless the meter is fitted with a reversing counter.

Air Blowing

If lines or arms have to be cleared to the ship using compressed air or inert gas, the following precautions should be strictly observed and the procedure agreed between the ship and the delivery vehicle (facility):

- There must be adequate ullage and venting in the reception or delivery tank.
- The operation must be stopped immediately after the line has been cleared.
- A competent person must continuously supervise the line clearing operation.

For additional guidance refer to Section 7.11 of ISGOTT.

3 Product Quantity, Quality and Sampling
3.1 Quantity Measurement Standards

Quantity measurements must be calculated in accordance with Petroleum measurement tables.

Part 1: Tables based on reference temperatures of 15.C and 60.F. ISO 91-1:1992 or I.P.200/92 or

ASTM-D 1250-90. Methods from other recognized standards authorities may only be used with agreement of Supplier Company. Such measurements are accepted as conclusive evidence of the quantities delivered.

Tank Gauging / Meters

Procedures employed, equipment used, and equipment installation should be in accordance with the latest edition of any one of the appropriate Institute of Petroleum (IP), American Petroleum Institute (API) or International Organization for Standardization (ISO), Standards or Codes of practice. The quantity of product delivered may be expressed as standard volume and/or weight (tons/kgs) depending upon the agreement with the supplier. Where temperature compensated meters are used, care must be taken to select and set the correct coefficient of expansion on the dial of the compensator. The delivery receipt should be endorsed with the words "Delivery made by temperature compensated meter" (see example of a Marine Petroleum Products Receipt Form in **Appendix E**).

Meters must be:

• Checked for accuracy at least annually or according to applicable regulations by the Marine Distributor and records kept.

• Certified annually by a national or international standardization body and these records must be kept.

In order to determine the quantity of product over-delivered due to meter wear, it is essential that good meter proving records are kept and analyzed. A log detailing all receipts and issues shall be maintained by the Plant Manager for all road tankers (transports). All road tankers should be correctly calibrated by a recognized authority.

Disputes

Quantity Dispute

The supplier's quantity measurements provide conclusive proof of the amount delivered, but the Chief Engineer or his representative should always be allowed to check the measurements and calculations. Disputes require a full examination of all documentation which may include previous product deliveries to the vessel, other product deliveries made by the same delivery transport on the same day, terminal logs, and all transfer documentation.

Letter of Protest

In the event of any dispute, the Chief Engineer of the vessel should raise a letter of protest. This must be signed by both parties and sent to Tropic Marine Group. Ideally, the dispute should be resolved to mutual satisfaction before the vessel's departure. If the dispute is not resolved, the Tropic VP Sales shall be notified immediately. If a quantity dispute is noted, the delivery agent should sign the document "for receipt only" so as to acknowledge the dispute but not to agree with it.

Quantity Control

It is essential that the PIC rely solely on his own measurements to control the delivery. The requisitioned quantity must never be exceeded without written authority from the Marine Department point of contact.

Avoiding Air Entrapment

When meters are used for measurement, precautions must be taken to avoid entraining air that would result in a meter reading in excess of the quantity delivered. In addition to the air-bleed connections fitted to the line, connections should be fitted to the meter and strainer. The line should be pressurized, and the air-bleeds opened before delivery commences. For road tanker low level pumping, made via a meter, the pumping rate should be slowed down and stopped near, but definitely before, the point at which vortex formation and air entrapment occurs. The use of low-level alarms can also help prevent this.

Temperature Correction

When correcting meter readings to standard temperature, the temperature gauge mounted in the line adjacent to the meter or in the meter strainer should be read at regular intervals throughout the delivery, and the average of the readings obtained used for calculation. Where temperature compensated meters are used, the correct coefficient of expansion on the dial of the compensator must be selected and set. To avoid quantity disputes, the counters of temperature-compensated meters should be clearly marked "Volume at standard temperature" i.e. 15C or 60F as appropriate. The delivery receipt should be endorsed with the words "Delivery made by temperature compensated meter" (see example of a Marine Petroleum Products Receipt Form in **Appendix F**).

3.2 Quality Complaints

Quality complaints do not usually arise until after the vessel has sailed. It is essential to secure quickly all pertinent information and data, including analysis of the first retained loading sample (not the MARPOL sample). In the event of disagreement about analysis, the second retained sample is reserved for use by an independent expert or arbiter. Supplier Company must be immediately advised of all quality complaints by the VP Quality Assurance.

3.3 Sampling

It is critical that samples of bulk products are taken, as delivery takes place outside of the closely monitored control of the blending and packing processes. Meticulous cleanliness is essential when taking samples, as any contamination may give inaccurate results and samples MUST be taken as close as possible to the point of delivery to the customer. As a guide, the total quantity samples should be at least 6 ounces for lubricants. Each supplier may have specific requirements for

sampling. For fuel deliveries, one MARPOL sample must be taken for each terminal sourcing the fuel.

Sampling Procedures

To ensure the credibility of retained samples, they must be taken in an approved manner, and whenever possible, in the presence of the Chief Engineer or Authorized Person. Samples should be drawn midway through the delivery, and the sampling apparatus sealed throughout the period of supply.
The Ship's Representative (Chief Engineer or nominee) must be invited to witness the sampling. After sampling, each sample should be securely sealed and labeled with the following information:

- Place at which sample is drawn
- Date and time of sampling
- Name of supply tanker or vessel
- Name of receiving vessel
- Name of product
- Name of person taking sample
- Terminal from which fuel was sourced (use Tropic terminal codes)

Sampling Safety and Hygiene

When taking samples, operators should:

- Wear appropriate PPE.
- Do not use solvents, gasoline and kerosene to remove lubricants from the skin.

Further details are available on the product's Safety Data Sheet.

Sample Distribution and Retention

After labeling and signing, one sample should be handed to the ship's representative. The other sample (plus MARPOL in the case of fuel) should be carefully returned to the Plant, where it is stored for six (6) calendar months, except for turbine oil, which must be retained for twelve (12) months. This is done

for each product/load delivered, but only one MARPOL sample is taken for fuel, unless the fuel was sourced at more than one terminal.

3 POLLUTION PREVENTION AND GENERAL SAFETY

4.1 Oil Spills in Water

Action in the event of Release or Spillage

The procedures for dealing with spills should be detailed in the Facility Response Plan on each Tropic delivery vehicle. When deliveries are made via truck, the Mobile Facility Operations Plan should be followed. This should include the site-specific response plans and co-operation with the relevant Port or USCG authorities. Plans shall be tested at least once a year and include delivery vessels to the greatest degree possible.

In the event of an operational spill:

- Stop all product flow and close all valves according to procedures.
- Assess the extent and location of spill.
- Containment & cleanup of spills are initially accomplished by the PIC
- Make calls according to the spill response plan notification list in the Coast Guard manual.
- Dispose of all materials used in a safe manner, per the manual.
- Conduct an immediate investigation of the facts to identify the causes of the spill & take corrective action. The VP Quality Assurance shall participate in the investigation.

All spills and other delivery incidents shall be reported to the Supplier by the VP, Quality Assurance after local regulatory authority notifications are made by the PIC. A completed incident investigation report shall include follow-up actions to prevent re-occurrence, and should be forwarded to the Supplier.

All spills to the water MUST be reported regardless of size; spills less than 25 gallons to a pavement or containment are considered loss of primary containment (LOPC) and can be cleaned up without damage to the environment and as such

reported as LOPC to the supplier and arrangements made to pay for the amount of product lost. All LOPC incidents and near misses around any petroleum transfer should be investigated for root cause and that report shared with the supplier.

Tiered Response

In recognition that different spill scenarios merit different responses Tropic Oil Company undertakes a contingency planning process that embraces the concepts of tiered response and maximum credible spill size. This involves the establishment of a series of site-specific response plans in cooperation with the relevant authorities that are backed by manpower and equipment resources for three tiers or levels of incident. This concept of "tiered response" has been accepted internationally and embraces the following incident and response scenarios:

Level 1

A small spill typically associated with an operational incident during loading operations, discharging or bunkering. The response is within the capability of, and should be organized by, Tropic PICs and Dispatchers using on-site resources that can be effectively deployed within an hour. Tropic maintains a mobile spill response kit for this purpose.

Level 2

A moderate spill, possibly resulting from a minor marine accident within a port, or close to it. Since the spill will affect more than one party and is of a size beyond response of a single party, the response is best organized by the appropriate local authority and involves combined local resources, deployed typically within 1 hour. Tropic has Oil Spill Response Organization (OSRO) agreements in place with a certified response company (e.g. Cliff Berry) to handle a spill at this level.

Level 3
A large spill often resulting from a major marine incident, such as a high-energy collision, explosion, or grounding. The response is best organized by national authorities and involves the mobilization and deployment of national and international resources, which may take up to 24 hours to arrive on the scene.

Liability

In the event of escape or spillage, the Master / Chief Engineer should be advised that the Standard Terms & Conditions of Sale between the Buyer and Supplier Company requires that:

The Buyer or his Agent shall promptly take, and shall assist and cooperate with the Seller or its delivering affiliate or agent in taking any necessary action to minimize the consequences of any spillage. The Buyer or his Agent shall supply the Seller or its delivering affiliate or its agent with all such documents and information concerning the spillage or any program for the prevention thereof, as are requested by the Seller or its delivering affiliate or its agent, or are required by law or regulations applicable at the delivery port.

4.2 General Safety Items

Fire Extinguishers

Fire extinguishers provided are chosen on the basis that they are suitable for use on the type fire, which may occur, and are capable of being used by the staff.
A fire extinguisher of suitable size (at least 20 lbs.) shall be ready for use when lubricants are being delivered. Fire extinguishers are inspected monthly.
Fire extinguisher maintenance must be carried out at least once a year.
All delivery personnel are regularly trained in the use of fire extinguishers.

Lamps and Flashlights

Only lamps and flashlights of an approved type and are in good condition are used.

Smoking

Smoking is forbidden, except in places specifically designated as safe.

5 Storage and Handling Procedures

The design of facilities installations is governed by international, national and local regulations, codes of practice and design criteria, which must be complied with.

5.1 Bulk products

A. GENERAL REQUIREMENTS

1. All bulk oil products shall be stored in dedicated tanks.

2. Tanks are clearly marked with the product stored, tank capacity and any other information that may be required by federal, state and local laws.

3. All tanks and totes shall meet all federal, state and local requirements, and are registered with the Florida Department of Environmental Protection (DEP) vis the Miami Department of Environmental Resource Management (DERM).

4. Tanks and totes that have held product are considered to be "confined spaces." As such, appropriate confined space signage shall be in place and employees shall be trained on the facility confined space program. If employees or contractors enter a confined space, a confined space permit program shall be utilized. Tropic Oil Company **does not** permit employees to enter confined spaces; only licensed contractors may do so.

5. All permanent tanks, portable tanks, and totes that contain any amount of bulk product must be within secondary containment capable of holding the contents of the largest individual tank/tote plus anticipated precipitation accumulation.

6. All tanks must be able to be accurately gauged.

7. API Table 6D shall be the standard reference in determining net volumes.

8. All tanks have a means of taking a representative sample.

9. Product temperature may not exceed 120 degrees F.

10. Standard tank change-over procedure is required from one manufacturer to another (tanks are to be drained dry, and internally inspected prior to changeover).

11. If the change-over is of a similar product family from the same manufacturer, the tank needs only to be drained and internally inspected.

B. RECEIPT FROM BLEND PLANT

1. Tank truck compartment manifolds must be inspected visually to ensure that they are clean, clear and free of retain products prior to load at blend plant.

2. No lubricant products will be loaded into compartments that previously carried gasoline or other chemicals, which could alter the characteristic of the product being loaded, without being thoroughly cleaned and dried.

3. No sensitive lubricant products, such as Zinc Free Oils, Hydraulic Oils, Turbine Oils, etc. shall be loaded prior to the compartments being thoroughly cleaned and flushed to industry tank cleaning standards.

4. Nomination paper work will be reviewed with Blend Plants nomination papers to confirm product names, and volumes to be loaded.

5. Truck operators must comply with all applicable safety precautions and regulations at the loading facility (driver safety equipment).

6. Monitor loading to ensure that compartments are not overfilled.

7. The product quantity shall be determined by weight scale or temperature corrected meter (using gravity charts) and should be verified by truck tank gauging.

8. Each tank compartment will be recorded as to product and amount on driver/company forms.

9. After completion of loading, all delivery receipts from Blend Plant will be checked with nomination paper work to ensure that the load is correct.

C. HOSES, PIPING, PUMPS, METERS, SCALES AND MANIFOLDS

1. Hoses used shall be dedicated to similar product groups or drained dry/flushed prior to use.

2. All hoses shall be drained or blown empty after each transfer, extreme care should be taken to ensure against contamination with other products.

3. Piping to tanks should be dedicated, if common piping is used it shall be dedicated to similar product groups and be able to be drained or pumped dry between product transfers.

4. Pumps shall be dedicated to similar product groups, and have the capability to be drained or pumped dry between product transfers.

5. Common manifolds shall be able to be drained or pumped dry between product transfers.

7. Common manifolds shall only be used with the similar product groups.

8. When common manifolds are used there should be redundant valves to ensure against contamination with other product lines and tanks.

9. Meters and scales shall be certified of their accuracy, and be re-certified annually. Certifications shall be maintained in the vehicle, or Medley Plant.

10. Meters should have air eliminators before the meter and provisions for temperature correction for net gallon calculations.

D. UNLOADING TO STORAGE TANKS

1. Review shipping papers to confirm product name and quantity to be unloaded.

2. The receiving tank ullage should be checked against the shipping papers to ensure there is sufficient room for the product off loaded.

3. When unloading from a tankwagon or tank trailer, the vehicle must be place in the rack area, where secondary containment is sufficient to contain any potential spill.

4. The bulk receiving log shall be completed, with the following information recorded:

Date and time
Name of product
Quantity of product
Vehicle compartment
Receiving tank
Receiving tank gauge before transfer
Receiving gauge after transfer
Name of PIC (Person in charge).
BOL

5. All valve alignments shall be checked before starting the transfer. Where a common manifold is used extra care should be made to ensure that the proper valves need for the receiving tank is open and that second person sighting is available and documented.

6. A sample should be taken before start of transfer and visually inspected. If the quality of the product appears questionable, **Do Not Unload** and notify Dispatch.

7. When a product of the same family group within a tank or container is changed, the tank or container must be drained, and visually inspected.

8. When a product of a different family within a tank or container is changed, the tank or container is drained, flushed and visually inspected.

E. SAMPLES

1. Sample containers shall be clean and made of clear plastic with leak resistant lids.

2. Sample containers shall be a minimum of 6 ounces.

3. Samples shall be kept for a minimum of six months for lubs and three months for fuel.

4. A sample shall be taken from the transfer system at the start of each product transferred.

5. A representative tank sample should be taken at the completion of product transfer.

6. All samples will be clearly labeled with the following:

Date and time
Vehicle number
Compartment number
Product name
Receiving tank number
Person taking sample
BOL

APPENDIX A: MASTER'S REQUISITION – LUBRICANTS

To: Supplier.....
Port.....
Vessel.....
Date.....
Dear Sirs,
Please supply my vessel the SS/MV.....with the following lubricants:
Item No.
(Note 1)
Lubricant Name Quantity
Gal or Lbs
Delivery Mode
(Note 2)
Bulk Deliveries
(Note 3)
Maximum
Pumping rate
(gals/minute)
Maximum
Pumping
Pressure
(psi)
Flange
Size (mm)
Note (1):- Please list bulk deliveries in the sequence the lubricants are to be pumped into the vessel's tanks. The least viscous grade should be pumped last where possible.
Note (2):- Please enter the container type e.g. drums, pails, or bulk delivery.
Note (3): - Please describe below if the location of the filling flange is likely to cause problems.
.....
The charges for the delivery should be sent to:

Bulk Deliveries

I will/will* not appoint a representative to witness and check the opening and closing reading/calculations, or if meters are not available, the opening and closing tank dips/calculations on my behalf.
I will/will* not appoint a representative to witness the sampling procedure, and sealing of samples.
The *Ship/Shore will give the final "stop pumping" signal. In the event that ship's valves are closed on board without giving ample warning to the Tropic Oil PIC, I recognize that the ship is solely responsible for any damage caused by excess pressure to supplier's pumping equipment or any resulting spillage/overflow of oil.
In the event that I am unable to accommodate the full quantity (ies) ordered above, I accept that my Principals will be liable for handling charges and any other expenses incurred on the shutout quantity, if it is found necessary to return this to the Tropic Oil Company plant.
**** Delete if NOT applicable***
Signature (Master/Chief Engineer).....
Print name in block letters with rank.....

Appendix B: Declaration of Inspection (DOI) Prior To Bulk Cargo Transfer

RECEIVING UNIT_____
DELIVERING UNIT_____
LOCATION _____
The following list refers to the requirements set forth in detail in 33 CFR 156.150, 156.120 and 46 CFR 35.35-30 (printed on reverse). The spaces adjacent to items on the list are provided to indicate that the detailed requirement has been met.

RELIEF (if needed)
RECEIVING DELIVERING RECEIVING DELIVERING
1. Communication System/Language Fluency. (156.120 (q) (v))
2. Warning Signs and red Warning Signals. (35.35-30)
3. Vessels Moorings. (156.120 (a) (b))
4. Transfer System Alignment. (156.120 (d))
5. Transfer System; unused components. (156.120 (c) (d) (e))
6. Transfer System; fixed piping. (156.120 (f) (g))
7. Overboard Discharges/Sea Suction Valves. (156.120 (u))
8. Hoses or Loading Arms condition. (156.120 (i)) (156.170)
9. Hoses; length and support. (156.120 (j)) (154.500)
10. Connections. (156.120 (p))
11. Discharge Containment System. (156.120 (m) (n))
12. Scuppers or Drains. (156.120 (o))
13. Emergency Shutdown. (156.120 (r) (q))
14. Repair Work Authorization. (35.35-30)
15. Boiler and Galley Fires Safety. (35.35-30)
16 Hoses and loading arms; test marking (156.120) (j)
17 Connections; gaskets, bolts (156.120) (k)
18 Monitoring devices (where required) 156.120 (i)
19 Communications; established and operable (156.120) (q)
20 Person in Charge 156.120 (s) (t)
21 Fires or Open Flames. (35.35-30)
22 Lighting (sunset to sunrise). (156.120 (y) (z))
23 Safe Smoking Spaces. (35.35-30)
24 Unused hoses and loading arms blanked (156.120) (f)
25 Sufficient Personnel. (156.120 (o) (s) (t))
26 Transfer Conference. (156.120 (w))
27 Agreement to begin transfer. (156.120 (w) (x))

Product Pumping Sequence Quantity: US Gallons Liters (1 USG=3.7854 L) Initials

1_____/_____
2_____/_____
3_____/_____
4_____/_____

I certify that I am qualified to act as a PIC for this vessel/facility. I also certify that I have personally inspected my facility with reference to the requirements set forth and have placed my initials in the space provided to indicate compliance with the regulation. I also acknowledge that I am required to remain at the site of the transfer and be immediately available. If I leave the site for any reason, I will inform the transferring vessel personnel and be properly relieved.

Signatures:
Person in Charge – Delivery Unit TITLE TIME & DATE
Person in Charge – Receiving Unit TITLE TIME & DATE

Appendix C: Marine LUBRICANT PRE-DELIVERY SAFETY CHECKLIST

Receiving Ship's Name .....
Tropic Oil Company PIC Name .....
Receiving Ship's Owner .....
Agent .....
Berth .....
Port ..... **Date** .....

The safety of operations requires that all questions should be answered affirmatively by clearly ticking (ü) the appropriate box. The responsibility for completing the checklist is a joint one and each question requires answering by representatives of the Tropic Oil PIC and receiving vessel, unless both parties agree to a 'N.A.' entry.
Both the receiving vessel and the supplier should retain a copy of the completed checklist.

Part A - Transfer Procedures Receiving

Vessel
Delivery
Supplier
Remarks
1. Have volumes to be transferred been agreed?
State volumes:
Lub Oil .....vol ..... Gal @ 60F
2. Have the transfer sequence and rates been agreed?
State sequence and rates:
Grade Initial Max Topping-
Rate Off Rate
.....
.....
.....
3. Has the maximum line pressure been agreed?
State pressure: ..... (bar)
4. Has the notice required for completion of transfer been agreed?
State period: ..... (Minutes)
5. Has agreement been reached on responsibility for stopping transfer?
Supplier or Receiving Vessel [delete as necessary]
6. Has the emergency shut down procedure been agreed?
State procedure:.....
7. Has the procedure for draining delivery hoses on completion of transfer been agreed?

Appendix C (CONT): ADDITIONAL PRE-DELIVERY CHECKS FOR CRANES

These additional checks should be completed in along with the full Pre-Delivery Checklist.

Part C – Additional checks for Vehicles: Supplier (tick if ok)

Comments

8. Is the vehicle parked safely nearest the vessel?
9. Are restrictions on lifting operations above the delivery working area in place?
10. Is the handbrake on and wheel chocks in place to prevent unnecessary vehicle movement?
11. Is the vehicle driver wearing personal protective equipment?
12. Are delivery hoses laid out to avoid damage by passing traffic?
13. Are hose connections in good order and in an area where any spillage or leakage can be contained?
14. Is access and movement around the vehicle and delivery area controlled?

Part D – Additional checks for Cranes: Supplier (tick if ok)

Comments

15. Is the crane secure?
16. Is the safe (maximum) working load clearly marked on the crane?
17. Are the hooks, wires, runners, slings and nets suitable and in good condition??
18. Are signals for using the crane agreed and understood by all parties?
19. Have delivery staff been instructed they should not stand under the load?

APPENDIX D: COMPLETING THE PRE-DELIVERY SAFETY CHECKLIST

Part A - Transfer Procedures

1. Have volumes to be transferred been agreed?
Clear agreement must be reached on the volumes of marine lubricants to be delivered.
Nominated grades and quantities should be confirmed, together with the order of transfer. Details entered on the checklist should conform to those on the Master's Requisition.
In confirming these details, the receiver's representative provides assurance that sufficient ullage exists within the receiving tanks to safely accept agreed volumes.

2. Have the transfer sequence and rates been agreed?
The procedures for the intended operation should be pre-planned. They should be discussed and agreed upon by representatives of the receiver and supplier prior to the start of the operations.
When multiple grades are being handled, the transfer sequence must be agreed. The initial and maximum loading rates, topping off rates and normal stopping times should be agreed, having regarded to:

- the arrangement and capacity of the ship's lines and tank venting arrangements.
- the maximum allowable pressure and flow rate in the transfer hoses or loading arms.
- any other flow control limitations.

Agreed rates should be detailed on the checklist.

3. Has the maximum line pressure been agreed?
Maximum line pressure should be established and entered on the checklist.
The receiver's representative will agree not to close valves on board during the transfer operation without giving ample warning to the supplier. In the event of such warning not being given in sufficient time, the supplier will hold the receiver solely responsible for any damage caused by excess pressure to equipment or any resulting spillage or overflow.

4. Has the notice required for completion of transfer been agreed?
Supplier and receiver should agree on the time required for notice for completion of transfer and ensure that details are inserted on the checklist.

5. Has agreement been reached on responsibility for stopping transfer?
Supplier and receiver must agree as to who has the responsibility for stopping pumping once the agreed volumes have been transferred.

6. Has the emergency shut down procedure been agreed?
An emergency shutdown procedure should be agreed between supplier and receiver and formally recorded on the checklist. Where fitted, a remote emergency stop pendant may be passed from the supply point to the receiving vessel.

Appendix D (CONT.)

Due regard should be given to the possible introduction of dangers associated with the emergency shutdown procedure.

7. Has the procedure for draining delivery hoses on completion of transfer been agreed?
On completion of transfer, it will be necessary to drain the contents of the hoses or loading arms prior to disconnection to ensure there will not be any spillage. Agreement must be reached as to where the contents will be drained. If possible, it is preferable to drain the contents into the ship's tanks or, if this is not possible, procedures will have to allow for draining into the delivery barge's tanks or to a slop facility on the wharf. Once the hoses or arms have been drained and disconnected, blank flanges should be fitted and fully bolted. For accurate measurement of delivered quantity, it is essential that the pipelines, hoses, meters, etc. are in the same condition i.e. full or empty of product, when the 'before' and 'after' measurements are taken.

Part B - Safety of Operations

8. ***Is the agreed communication system operative?***
Communication should be maintained in the most efficient way between the responsible officer on duty on the receiving ship and the person responsible for the supply. When telephones are used, the telephone both on board and ashore should be continuously manned by a person who can immediately contact his respective supervisor. Additionally, the supervisor should have a facility to override all calls. When RT/VHF systems are used, the units should preferably be portable and carried by the supervisor or a person who can get in touch with his respective supervisor immediately. Where fixed systems are used the guidelines for telephones should apply. The selected system of communication, together with the necessary information on telephone numbers and/or channels to be used, should be recorded on the checklist.
The telephone and portable RT/VHF systems should comply with the appropriate safety requirements. If at any stage of the operation, communication problems are being experienced or there is doubt as to whether communications are being understood, the transfer operation should be stopped and only resumed once satisfactory communication has been re-established.

9. Has the emergency signal to be used been agreed?
The agreed signal to be used in the event of an emergency arising ashore or on board should be clearly understood by shore and ship personnel and recorded on the checklist. A common emergency signal for the ship to use consists of a series of blasts on the ship's whistle. Should any doubt exist as to the meaning of a signal, the transfer operation should be stopped.

10. Is a person in constant attendance at both the delivery and receiving hose connections?
The operation should be under constant supervision and control, both on the receiving ship and at the shore or supply vessel. Persons should be in attendance at the hose connections throughout the transfer. Supervision should be aimed at preventing the development of hazardous situations. However, if such a situation arises, the controlling personnel should have adequate means available to take corrective action. Supply and receiver controlling personnel should maintain effective communications with their respective supervisors.

Appendix D (CONT.)

All personnel connected with the operations should be familiar with the dangers of the substances handled.

11. Are delivery hoses in good condition, properly rigged with all flange holes fully bolted?
The supervisor on the receiving vessel, normally the Chief Engineer or his representative, is responsible for identifying the point of delivery and the connections for reception of each grade of fuel or lubricants. Tropic Oil Company is responsible for providing the necessary adapters and reducers for making a secure connection to the vessel's reception facilities. Hoses should be in a good condition and properly fitted and rigged so as to prevent strain and stress beyond design limitations. All flange connections should be fully bolted and any other types of connections should be properly secured. If camlock connectors are used, levers should be secured in the closed position with tape, a rope, or wire lashing. Transfer hoses should be constructed of materials that are suitable for the products being handled, taking into account working temperatures and the maximum operating pressure. All hoses should be marked or stamped to enable easy identification. Hoses should be subjected to annual pressure testing and examined at intervals not exceeding six months. Test records or certificates are available for examination.

12. Is fire fighting equipment positioned and ready for immediate use?
Fire-fighting equipment, both on board and at the point of supply, should be correctly positioned and ready for immediate use. Adequate units of fixed or portable equipment should be stationed.

13. Is emergency oil spill response equipment positioned adjacent to both hose connections?
A quantity of absorbent material should be available on board and at the supply point to provide an immediate response to minor spills or leaks. Procedures for dealing with spills should be detailed in the vessels 'Shipboard Oil Pollution Emergency Plan' (SOPEP) and in the Tropic Oil Coast Guard Manual.

14. Are hand torches and portable radios of approved types?
Battery operated hand torches and VHF radiotelephone sets should be of a safe type which is approved by a competent authority. VHF radiotelephone sets may operate in the internationally agreed wave bands only. All equipment should be well maintained. Damaged units, even though they may be capable of operation, should not be used. The use of cell phones and pagers should be strictly controlled.

15. Is adequate lighting available to perform operations during hours of darkness?
The manifold areas both on board and ashore should be safely and properly illuminated during periods of darkness.

16. Are restrictions on smoking and the use of naked lights being observed?
No smoking is allowed on the jetty in the immediate vicinity of the supply connection.
A naked light or open fire comprises the following: flame, spark formation, naked electric light or any surface with a temperature that is equal to or higher than the minimum ignition temperature of the products handled in the operation. Naked lights should be prohibited during

Appendix D (CONT.)

bunker transfer operations within a radius of 25 meters from supply connections or bunker tank vents.

17. Are required delivery warning notices in position?
Notices stating 'Danger, Delivery in Progress - No Smoking' should be prominently displayed adjacent to the supply point.

18. Declaration
Must be signed and dated by the Receiving Vessel's Representative and the Tropic PIC. This should take place prior to commencing product transfer when all assurances that the operation is safe have been guaranteed.

Additional Pre-delivery checks – Trucks

19. Is the vehicle parked safely nearest the vessel?
The vehicle should park close to the vessel and should be on level ground. It should face the exit to enable ease of movement in the event of an emergency.

20. Are restrictions on lifting operations above the delivery working area in place?
Non-delivery related lifting operations such as movement of goods or freight containers should not be taking place directly over the vehicle or the delivery working area. If they are taking place, the activity should be stopped, or the vehicle moved to a safer area.

21. Is the handbrake on and wheel chocks in place to prevent unnecessary vehicle movement?
The handbrake should be applied and wheel chocks used during deliveries to ensure the vehicle cannot move during the delivery operation.

22. Is the driver wearing personal protective equipment?
Gloves, safety boots, protective clothing and hard hats should be worn for all deliveries.

23. Are delivery hoses laid out to avoid damage by passing traffic?
Hoses should be laid out so there is no risk of damage from passing traffic.

24. Are hose connections in good order and in an area where any spillage or leakage can be contained?
Whenever possible, a single length of hose should be used for the delivery. A delivery hose of at least 100 feet should normally be sufficient to meet this requirement. Where the delivery necessitates the use of two hoses, all hose coupling and joints must be in good condition and the couplings fully tightened with appropriate tools. Joins in hoses must not be located over water. All hose connections, at either end of any intermediate joins, should be made in an area in which any spillage or leakage from the coupling can be contained. Drip trays should be used where no local containment exists; the driver's own spill control kit may be used to meet this requirement. All joins in hoses should be inspected at the start of discharge and at regular, short intervals during the delivery.

Appendix D (CONT.)

25. Is access and movement around the vehicle and delivery area controlled?
In addition to prominently displayed notices stating 'Danger, Delivery in Progress - No Smoking', access and movement around the vehicle and working area should be controlled. This includes people, vehicles and moving equipment. Care should be taken to prevent introduction of ignition sources, particularly in public areas or where other activities are taking place. Activities that may introduce ignition sources include welding, cutting, grinding and smoking, and must not take place within 25 meters of the vehicle.

Additional Pre-delivery checks – Cranes

26. Is the crane secure?
Mobile cranes should be secured and immobilized so it is not possible for the crane to move unnecessarily. Movement and access around the crane should be controlled to prevent people or vehicles entering the work area.

27. Is the safe working load clearly marked on the crane?
Each crane must have the maximum (safe) working load marked clearly on it. The Products to be lifted must never exceed the maximum or safe working load.

28. Are the hooks, wires, runners, slings and nets suitable as well as, in good condition?
Chains, rings, hooks, slings, nets and ropes should be checked prior to use. Wires should be greased and not frayed. Hooks and runners should be of a suitable type and should not show signs of wear. Slings and nets should be complete, in good condition and secured.
Equipment that shows signs of wear that may endanger staff must not be used until certified safe by a competent person.

29. Are signals for using the crane agreed and understood by all parties?
Standard signals should be used for the lifting operation. It should be clear to all parties who are directing the operation, and what the signals are. Only a licensed crane operator may operate the crane

30. Have delivery staff been instructed they should not stand under the load?
At no time should delivery staff stand under a load as it is being lifted. Hard hat must be worn during the operation.

APPENDIX E: MARINE LUBRICANT PRODUCTS RECEIPT GUIDELINES

Provision should be made on every Marine Petroleum Products Receipt for the following information:

- Port of Delivery
- Date and Time of delivery
- Point of Delivery (Jetty No, Name of Anchorage if applicable, etc.)
- Name of Vessel
- Name and Address of owner/account name
- Grade(s) to be delivered
- Mode of Delivery for each Grade (*Bulk, Type of Packages) (*Barge, Truck, Pipeline)
- Quantity of each Grade to be delivered. (Clearly stating the units used.)

For bulk deliveries, provision should be made for inclusion of the following details for each grade delivered:

- Density @ Standard Temperature (e.g. 15°C)
- Delivered Temperature
- Density at Delivered Temperature
- Volume Correction Factor

In addition, the Delivery Receipt should contain the following declaration:

DELIVERY RECEIPT DECLARATION

Package Deliveries

I have taken delivery of the above mentioned grades and quantities of marine lubricants and certify that the seals on each package have been inspected and found intact. I accept the additional charges, itemized below, incurred during this delivery (if any).

Bulk Deliveries

I have taken delivery of the above mentioned grades and quantities of marine *Lubricants by Truck/tankwagon.

Sample of Bulk Delivered Product

I confirm that a sealed sample of the product delivered was accepted

Condition of Product

I confirm that the product was checked for water contamination and received in good condition.
Signed by Owners Representative

Remarks

Obviously, ports which never take bulk deliveries have no need to include provisions for them on their receipts. Ports that take bulk deliveries should endeavor to include the relevant data as prescribed above on a standard lubricant receipt or alternatively produce a separate receipt for bulk deliveries.

APPENDIX F: EXAMPLE OF A MARINE LUBRICANTS RECEIPT FORM

Nomination No.:
Vessel Name:
Date:
Purchaser:
Port of Delivery:
Jetty No./Anchorage point
Name and Address of Owner:
Name: Phone:
Street: Fax:
Town e-mail:
State
Post Code
Country
Product Name
e.g.
Requested Quantity
Measured Quantity (liters)
Delivered
Temp °C
Correction Factor
Density at 15°C
Corrected Quantity (Kgs)
Delivery Receipt Declaration
Package Deliveries:
I have taken delivery of the above mentioned grades and quantities of Lubricants delivered by truck and certify the seals on each package have been inspected and found to be intact.
Signature of Receiving Ship's Representative:
Name (block capitals):
Position (block capitals):
Bulk Deliveries:
I have taken delivery of the above mentioned grades and quantities of marine lubricants by truck. I confirm that a sealed sample of the product delivered was provided for me. I confirm that the product was checked for water contamination and received in good condition.
Signature of Receiving Ship's Representative:
Name (block capitals):
Position (block capitals):

APPENDIX G: EXAMPLE OF TRANSPORT/WAGON DELIVERY PROCEDURE

When delivering and measuring the volume delivered by vehicle compartment dip or loaded meter reading.

• Confirm nominated product and quantity availability
• Confirm vehicles, staff and facilities available to perform delivery
• Commence pre-delivery checks.
• Visit vessel, contact Master/Chief Engineer, and confirm products required as per nomination, complete all necessary paperwork e.g. Masters Requisition.
• Check type of hose connection (fittings required) and distance from point where vehicle will be able to park (length of hose required).
• Advise local authorities (Port Authority, Customs)
• Confirm vehicle, where necessary, has been suitably flushed for product to be loaded
• Park vehicle (reserved or safe area) at wharf
• Earth the vehicle
• Connect hoses (wired camlock levers)
- confirm that firefighting and Oil Spill cleanup gear is available and positioned ready for use
- "Danger, Delivery in Progress - No Smoking" signs positioned
- Drip trays empty under connections (with drain valves closed).
• Check two-way communication systems
• Take opening dip
• Complete the Pre-Delivery checklist (see Appendix C, and extra checks for vehicles)
• When advised by Ship's Officer commence delivery - low pressure/slow rate, check for any leaks
• Driver stays by vehicle, controls vehicles pump/valves to Ship's Officer requests.
• Arrange for samples to be taken and sealed (Ship's Representative to witness if required--see section on Sampling).
• On completion shut down vehicle pump/valves (Ship's Representative to witness vehicle compartments)
• Drain hoses
• Disconnect hoses and remove from wharf
• Remove all Oil Spill and Fire Fighting equipment from wharf
• Complete Receipt for delivery
• Obtain Ship's Representative signature on Receipt for Product

Vessel given Ship's copy of receipt and one (1) sealed and labeled sample, then store the sealed, labeled, retain samples for transport to Medley.

• Clean, service and store all equipment ready for re-use.

REFERENCES

External Publications

• The International Safety Guide for Oil Tankers and Terminals 4th Edition (ISGOTT) (Published by Witherby & Co LTD Fax: +44-2071-251-1296). ISBN1 85609 081 7

• Petroleum measurement tables- Part 1: Tables based on reference temperatures of 15.C and 60.F.

ISO 91-1:1992 or I.P.200/92 or ASTM-D 1250-90.

• BS1435 / EN1765 Hose Standards

• Recommendations on Safe Transport, Handling and Storage of Dangerous Substances in Port Areas (IMO)

U.S. Department of Homeland Security

United States Coast Guard

Commander
United States Coast Guard
Sector Miami

100 MacArthur Causeway
Miami Beach, FL 33139-5101
Staff Symbol: sp
Phone(786) 777-0775
Fax: (786) 777-0791

16619/ 14-0859
September 17, 2014

MISLE #: 4980544
FIN #: MIAMOB29

FACILITY RESPONSE PLAN APPROVAL LETTER

Tropic Oil Company
Attn: Mr. Michael Corr
10002 NW 89th Ave.
Miami, FL 33316

Dear Mr. Corr,

My staff has determined that the Tropic Oil Company Facility Response Plan meets Title 33 Code of Federal Regulations Part 154 (33 CFR 154) and it is hereby approved. **This approval is valid until September 17, 2019.**

You are reminded that the Tropic Oil Company is prohibited from handling, storing, transporting, transferring, or lightering oil unless it is operating in full compliance with this plan. Compliance includes ensuring that the required resources are in place and available through contract or other approved means.

You are required to resubmit an updated plan every five years in accordance with 33 CFR 154.1030 and 33 CFR 154.1060. If you make any changes outlined in 33 CFR 154.1065(b), such as changing the types of oil handled or your OSRO, you must submit revisions to this office within 30 days. Finally, you must notify this office if you make revisions to personnel and telephone number lists included in the response plan.

Please refer to the facility identification number MIAMOB029 in any future correspondence. If you have any questions, please contact the Sector Miami Facilities and Containers Branch at (786) 777-0775.

Sincerely,

T. M. HOWARD
Commander, U. S. Coast Guard
Captain of the Port
By direction

U.S. Department of Homeland Security
United States Coast Guard

Commander
United States Coast Guard
Sector Jacksonville

10426 Alta Drive
Jacksonville, FL 32226-2302
Phone: (904) 714-7500

16610/FAC 17-026
OCT 3 0 2017

Tropic Oil Company
Attn: David H. Gurney
10002 NW 89th Avenue
Medley, FL 33172

Dear Mr. Gurney:

We have determined the Facility Response Plan (FRP) you submitted June 19, 2017, meets the requirements of the Oil Pollution Act of 1990 and Title 33 Code of Federal Regulations § 154, and is hereby approved.

The expiration date of your approved FRP will be five years from the date of this letter. You are required to resubmit your FRP to the Coast Guard for approval prior to this date in accordance with 33 Code of Federal Regulations § 154.1060(e)(2).

Please note that future submissions of your approved FRP must be consistent with the applicable Area Contingency Plans in effect, no more than 6 months prior to the date your FRP is to be resubmitted. In addition, any revisions that significantly affect the information included in your FRP shall be resubmitted for review and approval, as appropriate.

If you have any questions, contact our Facility Inspections Branch at (904) 714-7500 ext 7760.

Sincerely,

P. C. BURKETT
Commander, U.S. Coast Guard
Chief, Prevention Department
By direction

U.S. Department of Homeland Security
United States Coast Guard

Commander
United States Coast Guard
Sector St. Petersburg

155 Columbia Drive
Tampa, FL 33606
Staff Symbol: sp
Phone: 813-228-2191

16611
FIN: MIAMOB29
MISLE: 6061799
JAN 0 1 2017

Tropic Oil Company
Attn: Mr. Osvaldo Roche
9970 NW 89th Court
Medley, FL 33178

Dear Sir:

The Facility Response Plan (FRP) submitted by Tropic Oil Company in accordance with Title 33 Code of Federal Regulations (CFR) Part 154.1017 is hereby approved for a five-year period from the date of submission, December 19, 2016.

Tropic Oil Company is prohibited from handling, storing, transporting, transferring, or lightering oil unless it is operating in full compliance with this plan. Compliance includes ensuring that oil spill response resources are in place or are available through contract or other approved means. The FRP must be reviewed annually, within one month of the anniversary date of your FRP submission, and resubmitted to the Coast Guard for approval at the end of this five-year period. Annual review requirements are described in 33 CFR 154.1065.

I commend your efforts in developing an FRP that reflects your company's operating procedures and organizational structure. Your plan is a vital working document and implementation of the plan will help ensure effective oil spill response and mitigation. Please be sure all parties with responsibilities under the plan are familiar with the plan's procedures and requirements.

Keep a copy of this letter with the facility response plan. If you have any questions, please contact the Facility Compliance Branch at (813) 228-2191, ext. 8304.

Sincerely,

E. C. ALLEN
Commander, U.S. Coast Guard
Captain of the Port
By direction

TROPIC OIL COMPANY

SPILL PREVENTION, CONTROL, AND COUNTERMEASURE PLAN (SPCC)

Tropic Oil Company

10002 NW 89th Avenue
Medley, Florida 33178

Revised October 2, 2017

SPILL PREVENTION CONTROL AND COUNTERMEASURE PLAN FOR

TROPIC OIL COMPANY

Designated person accountable for spill prevention

David H. Gurney VP Operations
Name & Title

CERTIFICATION

I hereby certify that I have examined the facility, and being familiar with the provisions of 40 CFR Part 112, attest that this SPCC Plan has been prepared in accordance with good engineering practices and EPA requirements in final rule dated July 1,2002

Robert W. Marshall PE
Print Name and Title
Registration Number: 37820

Signature and Date: 10/2/17

SPILL PREVENTION CONTROL AND COUNTERMEASURE COMPLIANCE INSPECTION PLAN

REVIEW PAGE

In accordance with 40 CFR PART 112.5 (b) a review and evaluation of this SPCC plan is conducted at least once every five years. As a result of this review and evaluation, Tropic Oil Company will amend the SPCC Plan within six months of the review to include more effective prevention and control technology if: (1) such technology will significantly reduce the likelihood of a spill event from the facility, and (2) if such technology has been field-proven at the time of review. Any amendment to the SPCC Plan shall be certified by a Professional Engineer within six months after a change in the facility design, construction, operation or maintenance occurs which materially affects the facility's potential for the discharge of oil into or on the navigable waters of the United States or adjoining shorelines. The plan must be reviewed every five years and if no amendments are made P.E. certification is not required. See review letter to be used in appendix "D".

REVIEW DATES

Year	Month	Day	Signature
2015			
2020			
2025			

MANAGEMENT APPROVAL

Tropic Oil Company is committed to the prevention of discharges of oil to the navigable waters and the environment and maintains the highest standards for spill prevention control and countermeasures through regular review, updating, and implementation of this Spill Prevention Control and Countermeasure Plan for the Bulk Fueling facility.

Authorized Representative: David H Gurney Vice President Signature_____

SPILL PREVENTION CONTROL AND COUNTERMEASURE- COMPLIANCE INSPECTION PLAN- continued...

This plan is prepared following the sequence specified in 40 CFR Part 112 Section 112.7. In the appendix at the end of this plan can be found:

Appendix A: facility layout and location map
Appendix B: procedures for reporting a spill
Appendix C: substantial harm certification
Appendix D: sample forms

Facility Description

This ON SHORE facility is a both (A) a bulk storage facility with a tank truck loading rack and receives product via rail car and tanker and (B) a fleet fueling facility for corporate clients with a capacity of 45,000 gallons. The bulk facility is separated from the fleet facility by a chain link fence.

(A) BULK STORAGE FACILITY WITH TANK TRUCK LOADING/ UNLOADING FACILITY

1. This facility contains gasoline, diesel fuel, No. 2 fuel oil, motor oil and marine oil.
2. The piping is single wall steel above ground.
3. The product is delivered to the bulk storage tanks by transport and rail car.
4. Tank trucks withdraw the fuel from the tanks via a loading area for transportation to other facilities.

Secondary containment is provided by a curbed fueling slab sloped to a catch basin and piped to an oil/ water separator through a normally closed valve for the tanker unloading/ loading rack area. See drawing in appendix A.

6. These trucks are driven by CDL certified drivers with HAZMAT certification.
7. The tanks have a combined capacity of 917,500 gallons.
8. All piping and tanks are inside a containment dike or above the contained fueling area except a small aboveground run from the rail car unloading area to the dike.

Section 112.7

(a) This facility has not experienced a spill within the previous 12 months.
(b) The existing tanks and piping, except a small aboveground run from the rail car unloading area to the dike, are enclosed in a containment dike designed to contain a minimum of 110% of the largest tank capacity. The secondary containment system for the loading area is designed to contain the largest compartment on the transport truck (3100 gal) in case of a failure. It is therefore unreasonable to have a discharge, which would exceed the secondary containment systems.

(c) (1) onshore facility: both the piping and tanks are secondarily contained in a concrete dike or above fueling retention slab, except a small aboveground run from the rail car unloading area to the dike.

(d) N/A

(e) (1) Facility drainage:

Drainage from the existing dike is controlled by locking ball valves.
Rainwater from the loading area gravity flows to the separator tank.
The valves are kept locked in the closed position.
Inspection of the run-off rainwater by the person authorized for spill prevention will be performed and logged before draining the rain water from the dike.
The valves will be closed and locked after draining.

(e) (2) Bulk storage tanks:

(I) All tanks are compatible with the material stored.

(ii) The piping and tanks are enclosed in a concrete containment dike, except a small aboveground run from the rail car unloading area to the dike.
The dike is capable of retaining at least 110% of the capacity of the largest tank.

(iii) Drainage from the existing dike is controlled by locking ball valves.
The valves are kept locked in the closed position.
Inspection of the rainwater run-off by the person authorized for spill prevention will be performed and logged before draining the rainwater from the dike.
The valves will be closed and locked under supervision immediately after draining.

(iv) Bulk storage tanks are above ground.

(v) Bulk storage tanks are above ground.

(vi) The tanks are above ground vertical single wall steel tanks subject to periodic integrity testing, visual inspections by operating personnel for signs of deterioration, leaks and oil accumulation inside the dike. The piping, tanks and dikes will be frequently observed by operating personnel for signs of deterioration and leaks.

(vii) There are no internal heating coils in the tanks.

(viii) Tank gages are located adjacent to each tank within the dike. The empty volume of the proposed tank will be verified to be in excess of the tanker compartment volume before filling is commenced.

(ix) N/a

(x) All visible product leaks which result in a loss of product from tank seams, gaskets, rivets and bolts sufficiently large to cause the accumulation of oil in the dike will be promptly corrected.

(xi) N/a

(e)(3) Facility transfer operations:

(I) N/A All piping is above ground

(ii) The transfer piping is capped when not in use.

(iii) The piping supports minimize abrasion and corrosion and allow for expansion and contraction.

(iv) All valves, piping and associated parts are inspected regularly by operating personnel. All valves and piping are located inside the containment dike or above the fueling slab, except a small aboveground run from the rail car unloading area to the dike.
(v) All aboveground piping is located inside the containment dike and above the fueling area, and a small aboveground run from the rail car unloading area to the dike and cannot be endangered by vehicular traffic.

(e)(4) Facility tank car and tank truck loading/ unloading rack (onshore)
(I) Tank car and tank truck loading/ unloading procedures exceed the minimum DOT requirements and regulations.
(ii) The rack area drainage flows into a catch basin then through a normally closed valve to an oil/ water separator. The containment area was designed to hold a minimum of 3,100 gallons, which is the largest single compartment/ truck size.
(iii) Warning signs will be posted in the loading/ unloading areas to prevent vehicle departure before complete disconnection of the flexible transfer lines.
(iv) Prior to filling and departure of the tank car and tank truck outlets and lower-most drain are closely examined for leakage, and if necessary, tightened, adjusted or replaced to prevent leakage while in transit.

(e)(5) N/A

(e)(6) N/A

(e)(7) N/A

(e)(8) Inspections and records:
A visual inspection will be made daily of the tanks, piping, valves, containment dike, and loading area containment system. Sample forms are provided at the end of this plan. All records will be kept at least three years. The tanks and piping system will be tested hydrostatically and after any work has been done on any part of the system that could cause a leak. Tank inspectors will meet STI or API certification.

(e)(9) Security:
(I) The bulk facility is fully enclosed with a chain link fence. The access gates are locked when the bulk facility is unattended.
(ii) The filling, withdrawal, dike and tank drain valves are locked in the closed position or capped when in non-operating or non-standby status.
(iii) The starter control on all oil pumps are kept in the off position and located at a site accessible only to authorized personnel when the pumps are in the non-operating or non-standby status.
(iv) The loading/ unloading connections of oil pipelines will be securely capped when not in service or standby service for an extended time.
(v) The facility has commensurate with the type and location of the facility. Consideration was given to: (A) the discovery of spills occurring during hours of darkness, both by operating

personnel and by non-operating personnel and (B) prevention of spills occurring through acts of vandalism.

(e)(10) Personnel, training and spill prevention procedures:
(I) The owners will properly instruct their personnel in the operation and maintenance of equipment to prevent the discharges of oil and applicable pollution control laws, rules and regulations.
(ii) The designated person accountable for oil spill prevention is:
(iii) The owners will schedule and conduct spill prevention briefing and demonstrate spill prevention procedures for their operating personnel at intervals frequent enough to assure adequate understanding of the this SPCC Plan. These briefing will highlight and describe known spill events or failures, malfunctioning components, and recently developed precautionary measures.
This plan is to be available at the facility as it staffed more than 8 hours 5 days a week.

(B) FLEET FUELING FACILITY

1. This facility contains both gasoline and diesel fuel.
2. The piping is double wall fiberglass installed underground.
3. The product is delivered to the above ground tanks by transport.
4. The fills are contained inside the containment dike
5. These trucks are driven by CDL certified drivers with HAZMAT certification.
6. The tanks have a combined capacity of 45,000 gallons.
7. The physical layout of this facility is as shown on the drawing on page XX.
8. The tanks are compatible with the product in them.
9. The tanks and piping are tested annually.
10. The piping leads to approved vehicle dispensers.

Sections (e)(8) through (e)(10) above apply in part to this portion of the facility.

Section 112.20 Facility Response plan:

A facility response plan is not required for this facility based on the criteria of appendix c to part 112- substantial harm criteria. A checklist and certification form is included in the appendix.

Section 112.21 Facility response training and drills/ exercises:

Not required for this facility, see 112.20.

(B) BULK LUBRICANT STORAGE AREA

Section 112.7

(a)(1)

1. **This facility contains gear oil, hydraulic oil, motor oil and marine oil.**
2. The piping is single wall steel above ground and runs from the top of the tank to an adjacent spill container.
3. The product is delivered to the tanks by transport.
4. Tank trucks withdraw the lubricants from the tanks for transportation to other facilities while parked on compacted shell rock surrounded on three side by an earthen berm with a movable boom which is installed during transfer operation. The area is designed to contain the largest compartment on the transport truck (3100 gal) in case of a failure. It is therefore unreasonable to have a discharge, which would exceed the containment systems.
6. These trucks are driven by CDL certified drivers with HAZMAT certification.
7. The tanks have a combined capacity of 108,000 gallons.
8. All tanks are double wall with only a small above ground piping run from the top of the tank to the adjacent spill container.

(b) Facility drainage:

Drainage from the existing dike is controlled by a berm and removable boom.
Rainwater from the loading area percolates into the ground.
The boom is installed when fuel transfer occurs.
The existing tanks are double wall.
Only a small above ground piping run exists between the top of the tank and the containment box.
The loading area is surrounded by a berm and boom system designed to contain a minimum of 110% of the largest tank capacity. The secondary containment system for the loading area **is designed to contain the largest compartment on the transport truck (3100 gal) in case of a failure. It is therefore unreasonable to have a discharge, which would exceed the secondary containment systems.**

(c) **(1) Onshore facility: the** tanks are double wall with only a small aboveground run from the top of the tank to the containment box.
(2) n/a

(d) n/a

(e) Inspections and records:

In case of a spill

Small spill caused by disconnecting hoses:

Contain spill and soak up fuel with absorbent gravel and absorbent rags.
Place rags and kitty litter in drum for proper disposal

Spill due to tank car/ tanker failure:

Use emergency stop switch to shut off power to the pumps.
Try to stop leak
Install booms around storm drains.
Call Fire Department (911) and Emergency First Response provider (1-954-763-3590).
Notify National Response Center (1-800-424-8802)

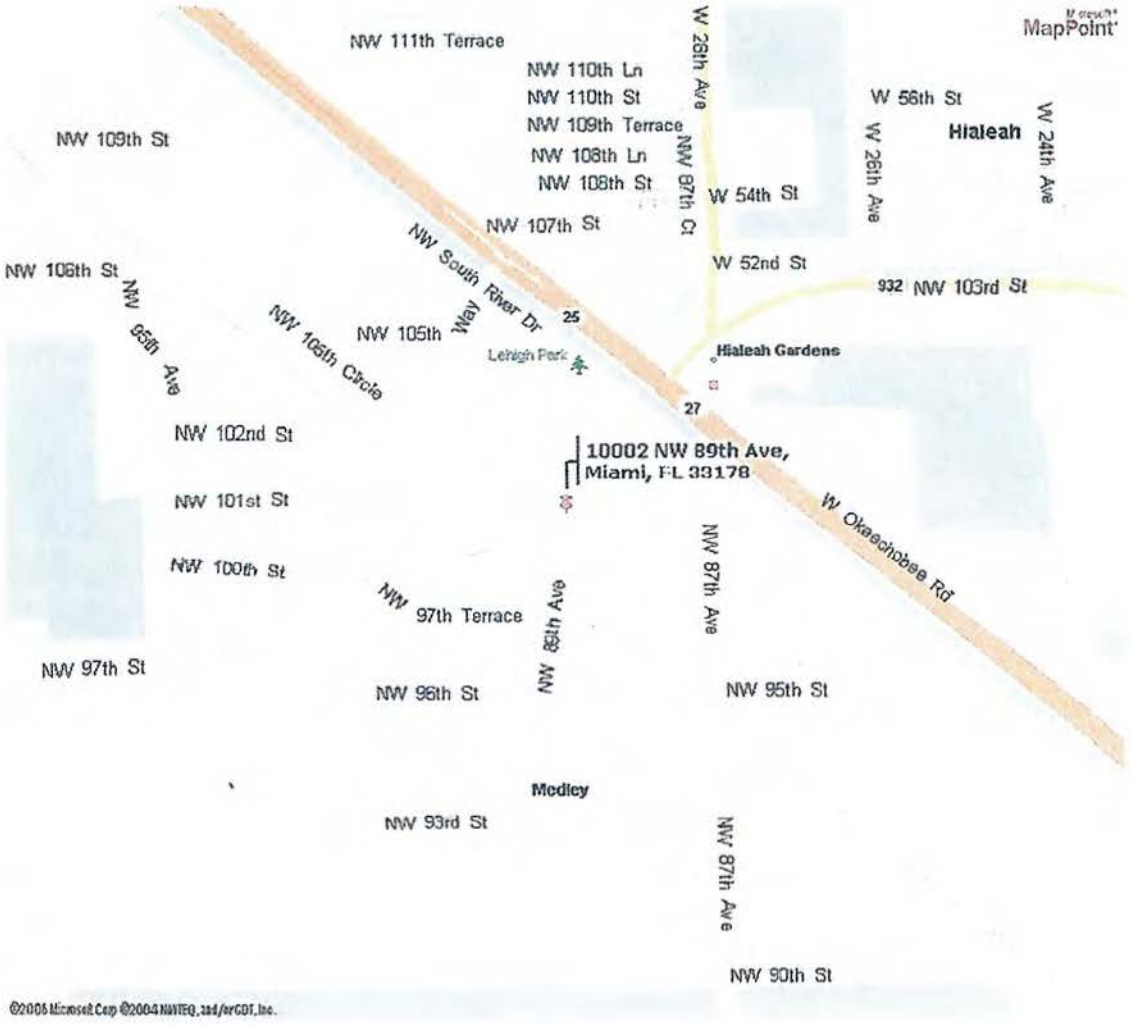
Spill due to piping or tank failure:

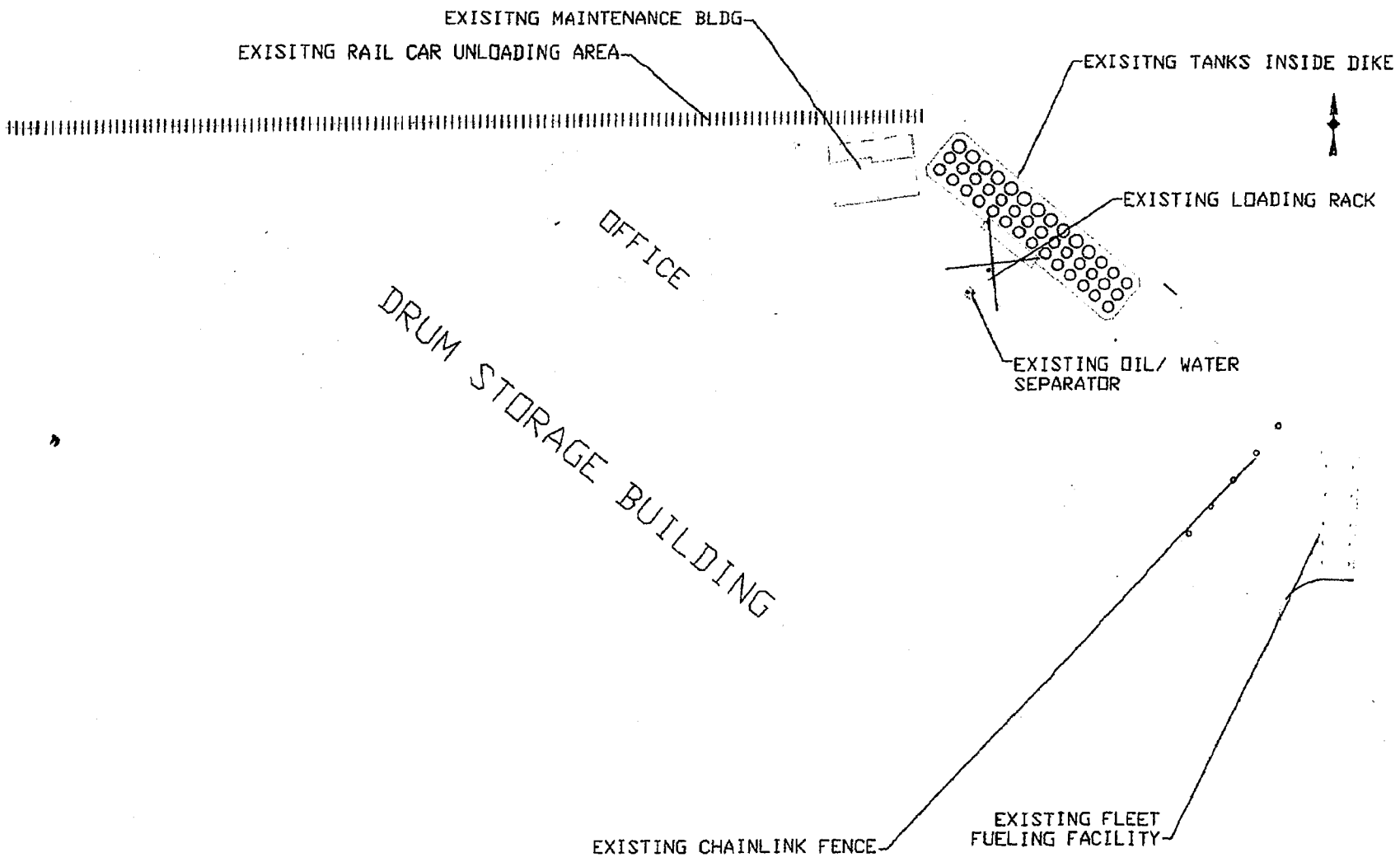
Use emergency stop switch to shut off power to the pumps.
Verify if the dike drain are closed, if not close them.
Try to stop leak.
Call Fire Department (911) and Emergency First Response provider (1-800-732-7745.
Notify National Response Center (1-800-424-8802)
Install booms around storm drains if the spill might exceed the capacity of the dike.

LIST OF OUTSIDE MANPOWER, EQUIPMENT & MATERIALS

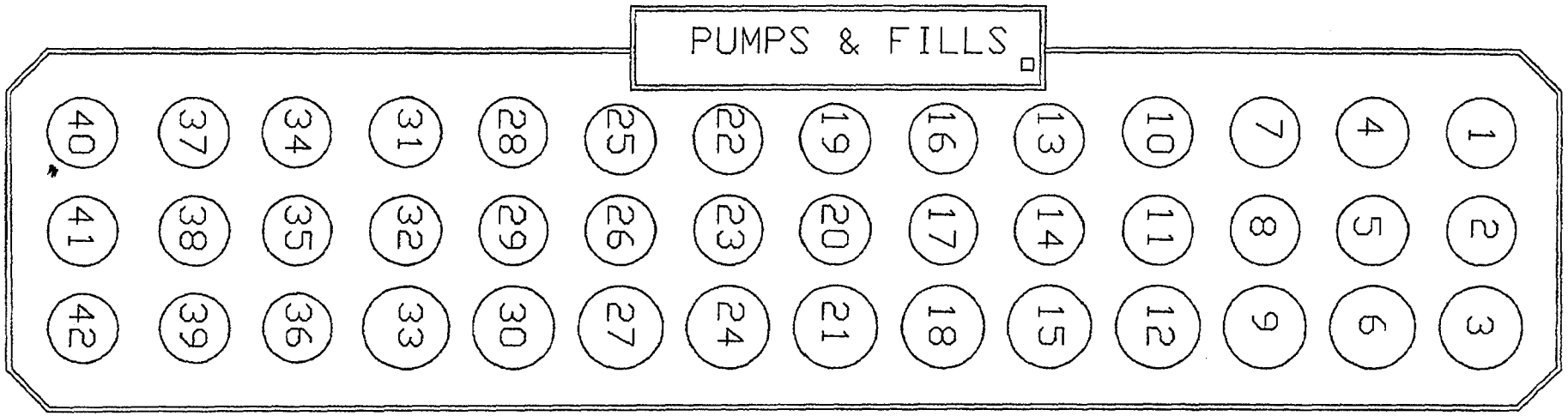
NAME	PHONE #	TYPE OF SERVICE
POLICE	911	**Security**
FIRE	911	**Fire Prevention**
Cliff Berry Enterprises	1-954-763-3590	**Industrial waste hauler**
Cliff Berry enterprises	1-954-763-3590	**Emergency first response provider for all spills**
Branching out	1-305-258-8101	**Fuel system repairs**

Appendix A
Site Plan and Facility Diagram





FACILITY LAYOUT

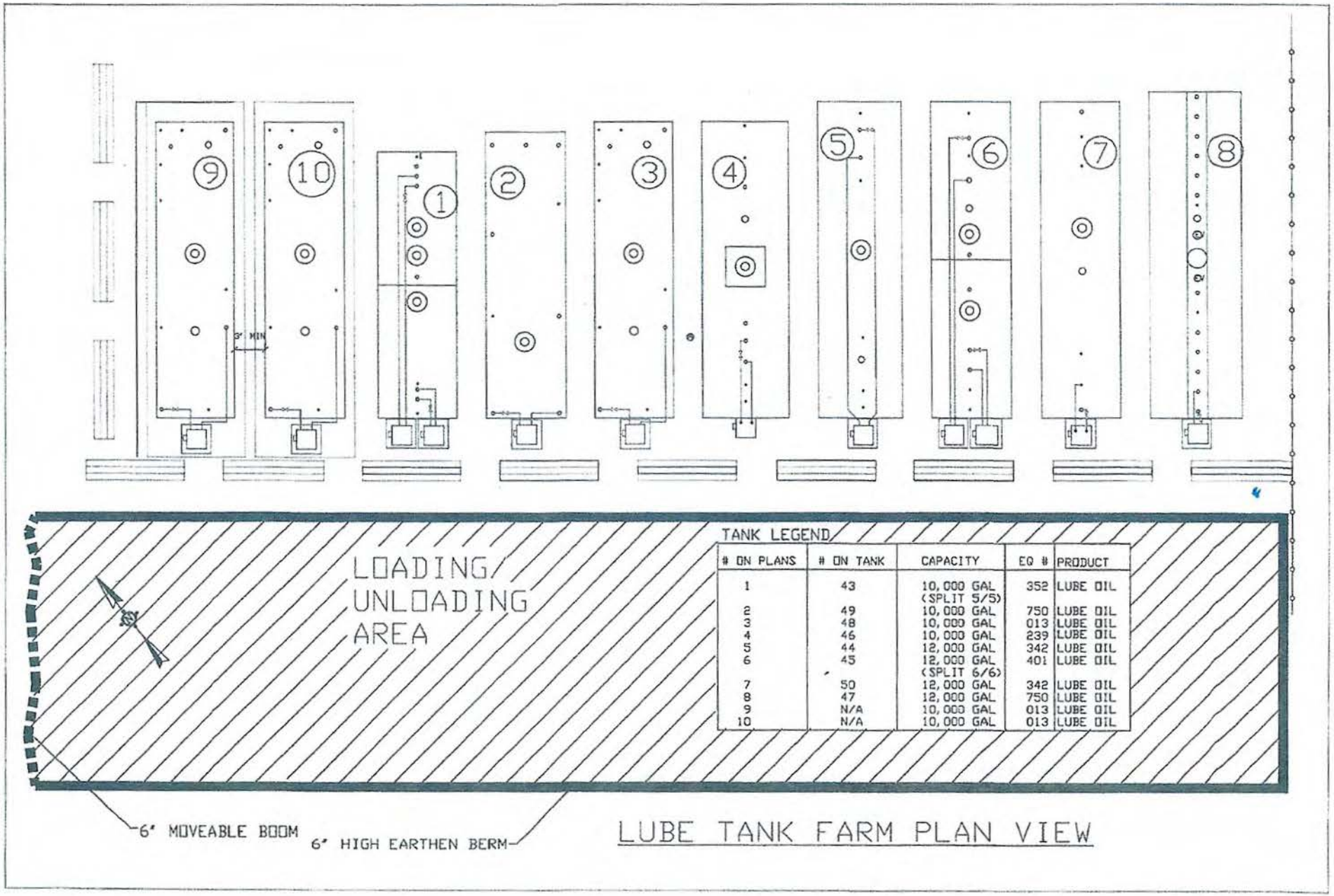


EXISTING DIKE AND TANKS

NUMBERS CORRESPOND TO THOSE ON THE NEXT TWO PAGES

Tank	Location	Type (Construction Standard)	Capacity (gallons)	Content	Discharge Prevention & Containment
1	Tank Farm	AST vertical (UL142)	15,000	Marine Oil	Concrete dike.
2	Tank Farm	AST vertical (UL142)	20,000	Marine Oil	Concrete dike.
3	Tank Farm	AST vertical (UL142)	30,000	Marine Oil	Concrete dike.
4	Tank Farm	AST vertical (UL142)	15,000	Marine Oil	Concrete dike.
5	Tank Farm	AST vertical (UL142)	20,000	Marine Oil	Concrete dike.
6	Tank Farm	AST vertical (UL142)	30,000	Marine Oil	Concrete dike.
7	Tank Farm	AST vertical (UL142)	20,000	Marine Oil	Concrete dike.
8	Tank Farm	AST vertical (UL142)	20,000	Marine Oil	Concrete dike.
9	Tank Farm	AST vertical (UL142)	30,000	Marine Oil	Concrete dike.
10	Tank Farm	AST vertical (UL142)	20,000	Marine Oil	Concrete dike.
11	Tank Farm	AST vertical (UL142)	20,000	Marine Oil	Concrete dike.
12	Tank Farm	AST vertical (UL142)	30,000	Marine Oil	Concrete dike.
13	Tank Farm	AST vertical (UL142)	20,000	Marine Oil	Concrete dike.
14	Tank Farm	AST vertical (UL142)	20,000	Marine Oil	Concrete dike.
15	Tank Farm	AST vertical (UL142)	30,000	Marine Oil	Concrete dike.
16	Tank Farm	AST vertical (UL142)	15,000	Motor Oil	Concrete dike.
17	Tank Farm	AST vertical (UL142)	15,000	Motor Oil	Concrete dike.
18	Tank Farm	AST vertical (UL142)	30,000	Marine Oil	Concrete dike.
19	Tank Farm	AST vertical (UL142)	15,000	Motor Oil	Concrete dike.
20	Tank Farm	AST vertical (UL142)	15,000	Motor Oil	Concrete dike.
21	Tank Farm	AST vertical (UL142)	30,000	Marine Oil	Concrete dike.
22	Tank Farm	AST vertical (UL142)	15,000	Motor Oil	Concrete dike.
23	Tank Farm	AST vertical (UL142)	20,000	Motor Oil	Concrete dike.
24	Tank Farm	AST vertical (UL142)	30,000	Marine Oil	Concrete dike.
25	Tank Farm	AST vertical (UL142)	20,000	Hydraulic Oil	Concrete dike.
26	Tank Farm	AST vertical (UL142)	20,000	Marine Oil	Concrete dike.
27	Tank Farm	AST vertical (UL142)	30,000	Marine Oil	Concrete dike.
28	Tank Farm	AST vertical (UL142)	20,000	Diesel	Concrete dike.
29	Tank Farm	AST vertical (UL142)	20,000	Diesel	Concrete dike.
30	Tank Farm	AST vertical (UL142)	30,000	Diesel	Concrete dike.

31	Tank Farm	AST vertical (UL142)	20,000	Hydraulic Oil	Concrete dike.
32	Tank Farm	AST vertical (UL142)	20,000	Diesel	Concrete dike.
33	Tank Farm	AST vertical (UL142)	30,000	Diesel	Concrete dike.
34	Tank Farm	AST vertical (UL142)	15,000	Motor Oil	Concrete dike.
35	Tank Farm	AST vertical (UL142)	20,000	Diesel	Concrete dike.
36	Tank Farm	AST vertical (UL142)	20,000	Diesel	Concrete dike.
37	Tank Farm	AST vertical (UL142)	15,000	Hydraulic Oil	Concrete dike.
38	Tank Farm	AST vertical (UL142)	15,000	Gasoline	Concrete dike.
39	Tank Farm	AST vertical (UL142)	15,000	Gasoline	Concrete dike
40	Tank Farm	AST vertical (UL142)	20,000	Low Sulfur Diesel	Concrete dike
41	Tank Farm	AST vertical (UL142)	15,000	Low Sulfur Diesel	
42	Tank Farm	AST vertical (UL142)	15,000	Low Sulfur Diesel	Concrete dike



TANK LEGEND

# ON PLANS	# ON TANK	CAPACITY	EQ #	PRODUCT
1	43	10,000 GAL (SPLIT 5/5)	352	LUBE OIL
2	49	10,000 GAL	750	LUBE OIL
3	48	10,000 GAL	013	LUBE OIL
4	46	10,000 GAL	239	LUBE OIL
5	44	12,000 GAL	342	LUBE OIL
6	45	12,000 GAL (SPLIT 6/6)	401	LUBE OIL
7	50	12,000 GAL	342	LUBE OIL
8	47	12,000 GAL	750	LUBE OIL
9	N/A	10,000 GAL	013	LUBE OIL
10	N/A	10,000 GAL	013	LUBE OIL

LUBE TANK FARM PLAN VIEW

Appendix B

PROCEDURES FOR REPORTING A SPILL

This appendix contains the following:

1. **Reporting procedure for leaks, spills, and overfills of refined oil.**
2. **What to say when reporting 1. Above to NRC & DNR.**
3. **Follow up spill reporting procedure.**
4. **A. Spill history form.**
   B. Notification Checklist

REPORTING PROCEDURE FOR
LEAKS, SPILLS, AND OVERFILLS OF REFINED OILS

The reporting for The Company is to be inserted by the owner following this page. Also a laminated copy of this procedure is posted where all can see and read it. The owner needs to keep this page updated as personnel change, move and change phone numbers and phone companies are changing area codes.

REPORT IMMEDIATELY ANY LEAK, SPILL OR OVERFILL TO:

NATIONAL RESPONSE CENTER (NCR) 1-800-424-8802

Follow the company guidelines on next page and posted laminated page.

WHAT TO SAY WHEN REPORTING LEAK, SPILL, OR OVERFILL TO NCR AND MDNR

ALWAYS TELL THE TRUTH. GIVING FALSE INFORMATION OR ATTEMPTING TO COVER UP IS A CRIMINAL ACT AND SUBJECT TO SEVERE PENALTIES.

FOLLOW THE EXHIBIT "A" ON NEXT PAGE AND ON THE LAMINATED PAGE POSTED WHERE ALL CAN SEE AND READ.

FOLLOW UP REPORTING

THE HOME OFFICE PEOPLE WILL NEED THE FOLLOWING FROM THE FACILITY:

1. TYPE OF PRODUCT INVOLVED.

2. QUANTITY SPILLED.

3. TYPE OF SPILL.LEAK, OVERFILL, HOSE BREAK.

4. EXACT LOCATION OF SPILL ON PROPERTY, IF NOT DIRECTION OF FLOW.

5. IS PRODUCT CONTAINED IN CONTAINMENT DIKE.

6. THE NEAREST DITCH, CREEK, LAKE OR RIVER.

7. STEPS BEING TAKEN TO COMMENCE THE CLEAN UP.

8. WRITE DOWN WHO YOU CALLED, WHO YOU TALKED TOO, TIME OF CALL AND WHAT WAS SAID. KEEP A WRITTEN RECORD OF EVERYTHING YOU DO.

Mobile Facility Emergency Action Plan

As required by 33 CFR 154.1035

33 CFR 154.1035 (A)

(1)

Introduction

Tropic Transportation LLC
2550 Eisenhower Blvd #4
Port Everglades, Florida 33316
954-779-7275

Tropic Oil Company
9970 NW 89th CT.
Miami, Florida 33178
305-888-4611 (P)
305-887-3166 (F)
GPS 80.343695 x 25.865757

660 South Industry Rd.
Cocoa, Florida 32926
321-632-7172

(2, 3)

The main facility for TROPIC OIL COMPANY (hereafter "Tropic") is located approximately ¼ mile south of the intersection of NW South River Drive on 89 Ave. in the township of Medley, Florida. Mobile facilities may be located throughout South Florida at the Ports of Miami, Fort Lauderdale, Key West, Canaveral, Jacksonville, Tampa, Manatee, and Sutton as well as multiple marinas serviced by Tropic. Tropic Transportation LLC (hereafter "Tropic Trans") has 38 tractor trailers with a capacity of 9200 – 9400 US gallons, 1 tank wagon of 2800 US gallons, 1 tank wagon of 4500 gallons, 2 tanks wagons of 4400 gallons and 6 tank wagons of 5100 US gallons, and 5 van trucks. All vehicles are equipped with fire safety equipment and spill containment devices.

The main facility, addressed above, is equipped with a 24 hour answering machine for after hours and weekend operations containing a message of emergency contacts should the need arise. The main contact for after hour's emergencies shall be the President, **Stephen Gorey**, with a 24 hour contact number of 305-345-8775. Plant Manager, **Osvaldo Roche**, with a 24 hour contact number of 786-298-8632, shall be point of contact two. Vice President **David Gurney**, with a 24 hour contact number of 305-506-5484 is point of contact three. Every mobile facility will be manned by at least one Tropic Trans employee properly trained in the transfer of bulk fuel and oils, as well as in the procedures delineated in this manual.

Bunkering operations may be performed 24 hours per day, 7 days per week.

(4)
Table of Contents
33 CFR 154.1035 (A)

(5)
N/A

(6)

Record of Changes

33 CFR 154.1035 (B)
(1) (a, b)

EMERGENCY CONTACT NUMBERS

Contact	Name	Phone
A. Facility - Tropic		305-888-4611
B. Q.I. (President.)	Steve Gorey	305-345-8775 (24 Hr)
C. Alt. Q.I. (Vice-President)	David Gurney	305-506-5484 (24 Hr)
Alt. Q.I. (Foreman)	Osvaldo Roche	786-298-8632 (24 Hr)
Alt. Q.I. (Foreman)	Jarred Allinson	321-288-7071 (24 Hr)
Alt. Q.I. (Owner)	George LeVasser	305-756-6395 (RES)
D. Local Police/Fire/Medical		911
Key West Police Department		305-809-1111
Monroe County Sheriff Office		305-296-2424
Key West Fire Department		305-292-8284
E. National Response Center		**800-424-8802**
		202-267-2675
F. EPA Region 4		404-562-8700 / 9900
G. State Warning Point		800-320-0519
H. USCG Port Canaveral (24 Hr)		321-868-4200
USCG Miami (24 Hr)		305-535-8700
USCG Key West (24 Hr)		305-292-8727
USCG St. Petersburg (24 Hr)		727-824-7534
I. MSO Canaveral		321-784-6780
MSO Miami		305-535-8709
MSO Key West		786-295-9057
MSO St. Petersburg		813-228-2191
J. USCG Sector (7) Jacksonville (24 Hr)		904-714-7500 / 7557
USCG Sector (7) Miami (24 Hr)		305-535-4472 / 4520
USCG Sector (7) Key West (24 Hr)		305-292-8809
USCG Sector (7) St. Petersburg (24 Hr)		813-228-2192
K. Cliff Berry Inc. (OSRO)		800-899-7745

33 CFR 154.1035 (B)
(1) (ii)

See Enclosure A for Notice of Discharge Form

(2) (i)
Products Transferred

All products transferred are petroleum-based and generally classified as: diesel fuels, motor gasoline, or lubricating oils. Items (ii) A – F is contained in the SDS (formerly MSDS) which are in (Enclosure F) and are on file at the physical plant at the main Tropic facility defined above.

In the event of an **average most probable** discharge from:

(1) Tractor/trailer combination with a maximum capacity of 9,400 US gallons and the maximum capacity of the largest single compartment being 9,200 US gallons the discharge would be 92 US gallons.
(2) For a tank wagon with a maximum capacity of 5,100 gallons and the maximum capacity of the largest single compartment being 2,100 US gallons, the discharge would be 21 US gallons.

In the case of the **maximum most probable** discharge from:

(1) Tractor/trailer combination with a maximum capacity of 9,400 US gallons and the maximum capacity of the largest single compartment being 9,200 US gallons the discharge would be 920 US gallons.
(2) For a tank wagon with a maximum capacity of 5,100 gallons and the maximum capacity of the largest single compartment being 2,100 US gallons the discharge would be 210 US gallons.

In the event of a **worst-case discharge** where an entire vehicle is lost:

(1) Tractor/trailer combination have a maximum capacity of 9,400 US gallons
(2) For a tank wagon, the maximum capacity is 5,100 gallons.

2 (ii)
Procedures to mitigate discharges

All Tropic Trans vehicles carry flexible booms and bundles of absorbent pads for use in day-to-day operations; see (Enclosure B) for a detailed description of equipment carried. Drip containment receptacles are carried on all vehicles and are to be placed at all connections of hoses and pumps. These receptacles under the hose connections and pumps are more than 5 gallons each in capacity. A flexible, non-perforated hose sleeve may be employed to enclose connections near the water for the purpose of guiding any leaks to a receptacle. Any product captured is transferred to a sealable 5 gallon container and returned to the plant for proper disposal. Prior to transferring product, the driver (P.I.C.) contacts the Chief Engineer or his representative. Together they will fill-out the Declaration of Inspection (Enclosure I) and discuss product quantities, descriptions, available tank space, and emergency procedures in the event of a discharge in either's area of responsibility. After hoses are connected and containment receptacles are in place, the driver shall walk the length of the hose to double-check that there is no obstruction and/or loose connections. Once the driver has established direct communications with the ship's P.I.C., he opens the valve and engages the power take off (PTO) to begin the pumping operation. Note: warning signs are displayed in ports where required.

(A)

In the event of a **hose discharge**, the P.I.C. has several options to mitigate the discharge. The P.I.C. (driver) has been trained and knows the locations of all emergency shut-off systems on his facility. He has the option(s) of:
A: Product discharge lever-operated valve for compartment, right side, center, of trailer/tank wagon
B: Emergency shut-off valves for all compartments in box, right side, center, of trailer/tank wagon
C: Single remote control lever on left front of trailer/tank wagon
D: Power take off control for pump located in cab of tractor/tank wagon
NOTE: The four locations of the shut down equipment on each trailer/tank wagon enables the P.I.C. to stop operations immediately in the event of an emergency, regardless of where he may be positioned around the vehicle. Once the shut down procedure is completed, the driver will contain any spill immediately, using booms in the water and absorbent pads on the dock to plug scuppers and/or storm drains. He shall identify the exact source of the release. If the source is within the control of Tropic Trans P.I.C., the P.I.C. shall make the best effort to mitigate any further discharge after initial release.

(B)

In the event of a **tank overfill** on the receiving facility, once noticed or notified, the P.I.C. (driver) has been trained and knows the locations of all emergency shut-down systems on his facility. He has the options of:
A: Product discharge lever-operated valve for compartment, right side, center, of trailer/tank wagon
B: Emergency shut-off valves for all compartments in box, right side, center, of trailer/tank wagon
C: Single remote control lever on left front of trailer/tank wagon
D: Power take off control for pump located in cab of tractor/tank wagon
NOTE: The four locations of the shut down equipment on each trailer/tank wagon enables the P.I.C. to stop operations immediately in the event of an emergency regardless of where he may be positioned around the vehicle. The driver will then wait for instruction from the vessel's P.I.C.
In the event of a **tank overfill** on our facility; the P.I.C. has several courses of action to mitigate the discharge. The P.I.C. (driver) has been trained in and knows the locations of all emergency shut down systems on his facility. He has the options of:
A: Product discharge lever operated valve for compartment, right side, center, of trailer/tank wagon
B: Emergency shut-off valves for all compartments in box, right side center of trailer/tank wagon
C: Single remote control lever on left front of trailer/tank wagon
D: Power take off control for pump located in cab of tractor/tank wagon

NOTE: The four locations of the shut down equipment on each trailer/tank wagon enable the P.I.C. to stop operations immediately in the event of an emergency, regardless of where he may be positioned around the vehicle. Once the shut-down procedure is completed, the driver will contain spill immediately using booms in the water and absorbent pads on the dock to plug scuppers and/or storm drains. The driver will then begin mitigation procedures outlined in section **(3) (i)**

(C)

In the event of a **tank failure** on our facility during the transfer, the driver shall immediately cease all transfer operations by employing the shut down procedures in (A) & (B). He will then deploy booms and absorbents around the facility to best contain the product from the ruptured compartment(s). The driver will then connect a hose to the auxiliary fitting on the pump discharge line and route the product from the ruptured tank into an empty compartment.

(D, E)

In a **facility piping rupture and piping leak discharge** the P.I.C. has several options to mitigate the discharge. The P.I.C. (driver) has been trained in and knows the locations of all emergency shut down systems on his facility. He has the option(s) of:
A: Product discharge lever operated valve for compartment, right side, center, of trailer/tank wagon
B: Emergency shut-off valves for all compartments in box, right side, center, of trailer/tank wagon
C: Single remote control lever on left front of trailer/tank wagon
D: Power take off control for pump located in cab of tractor/tank wagon
NOTE: The four locations of the shut-down equipment on each trailer/tank wagon enable the P.I.C. to stop operations immediately in the event of an emergency, regardless of where he may be positioned around the vehicle. Once the shut-down procedure is completed, the driver will contain any spill immediately, using booms in the water and absorbent pads on the dock to plug scuppers and/or storm drains.

(F)

In the event of a facility fire or explosion the P.I.C. has several options to mitigate the discharge. The P.I.C. (driver) has been trained in and knows the locations of all emergency shut down systems on his facility. He has the options of:
A: Product discharge lever operated valve for compartment, right side, center, of trailer/tank wagon
B: Emergency shut down valves for all compartments in box, right side, center, of trailer/tank wagon
C: Single remote control lever on left front of trailer/tank wagon
D: Power take off control for pump located in cab of tractor/tank wagon
NOTE: The four locations of the shut-down equipment on each trailer/tank wagon enable the P.I.C. to stop operations immediately in the event of an emergency, regardless of where he may be positioned around the vehicle. Once the shut-down procedure is completed, the driver will, if conditions permit, contain any spill immediately using booms in the water and absorbent pads on the dock to plug scuppers and/or storm drains. If life-threatening conditions exist, the driver will evacuate to a safe area and then notify appropriate emergency personnel listed in Emergency Contact List, then notify his supervisor.

(3) (i)

Spill Mitigation Procedures

Upon determination of a discharge, P.I.C. (driver) of transfer will act as first level of response, he will supervise containment procedures contained in Section (2) (ii) page 5-6 until the QI has arrived on scene, at which point the QI will assume supervision responsibilities. During the initial event the driver shall:
A: Stop pumping procedure immediately by employing Emergency Shutdown Procedures, page 5-6, (2) (ii) (A - D).
B: Contain spill immediately using booms in the water and absorbent pads on the dock to plug scuppers and/or storm drains. Identify exact source of release. If the source is within the sphere of his control, the P.I.C. shall make a best effort to mitigate any further discharge. This is to include, but not be limited to, removal of any hose involved.
C: Notify product receiver of emergency situation.
D: Notify appropriate personnel listed in Emergency Contact List, page 4, then notify supervisor.
E: See (Enclosure B) for a list of response equipment located on tank wagons or trailers.
F: For Environmentally-sensitive areas, see (Enclosure C)

(3) (ii)

The Tropic Trans qualified individual and alternate will:

(1) Be legal residents or citizens of the United States

(2) Speak fluent English

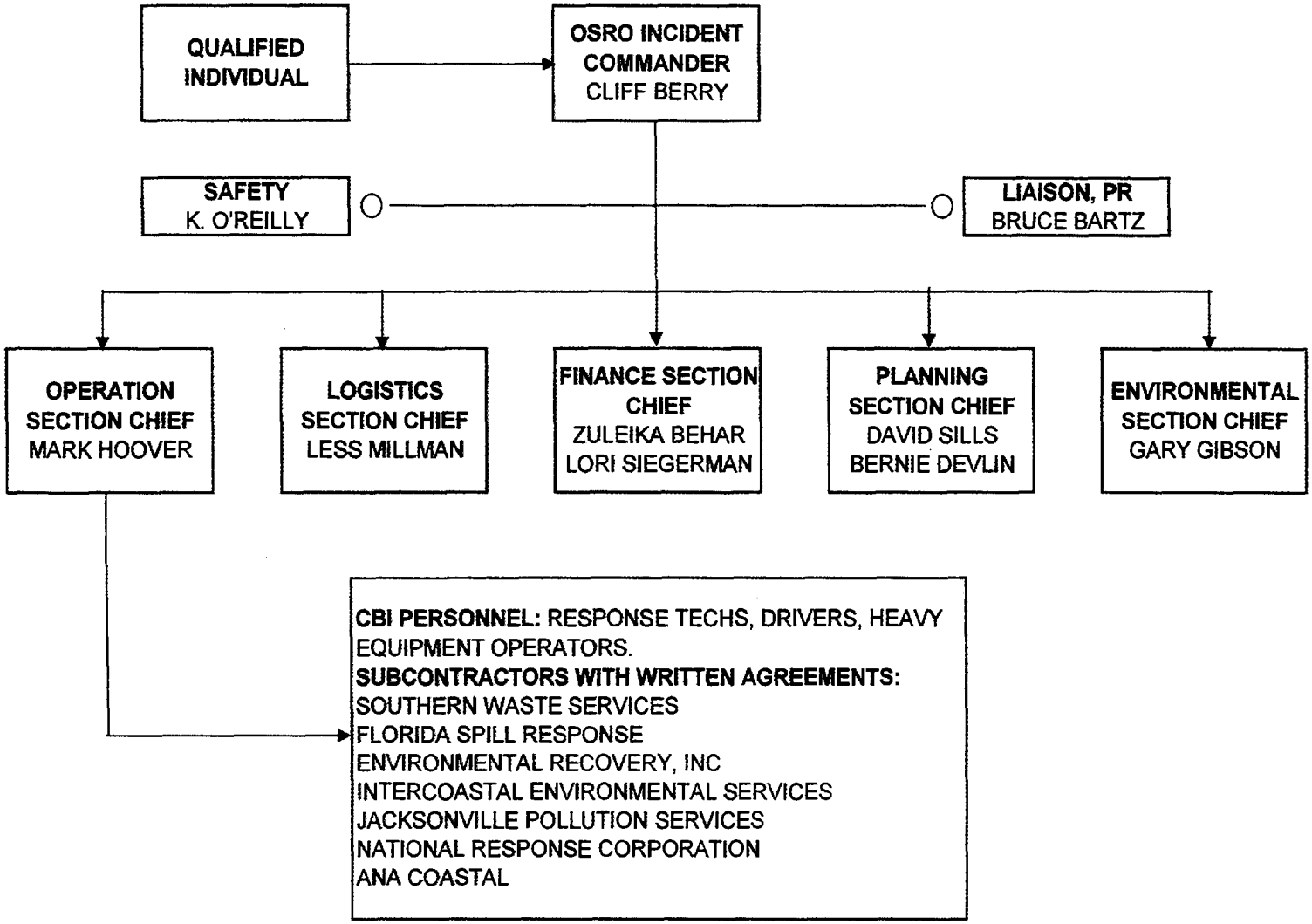
(3) Be familiar with the implementation of the Facility Response Plan.
(See 33CFR 154.1035 (c) pages 10-11, Training and Exercises.)

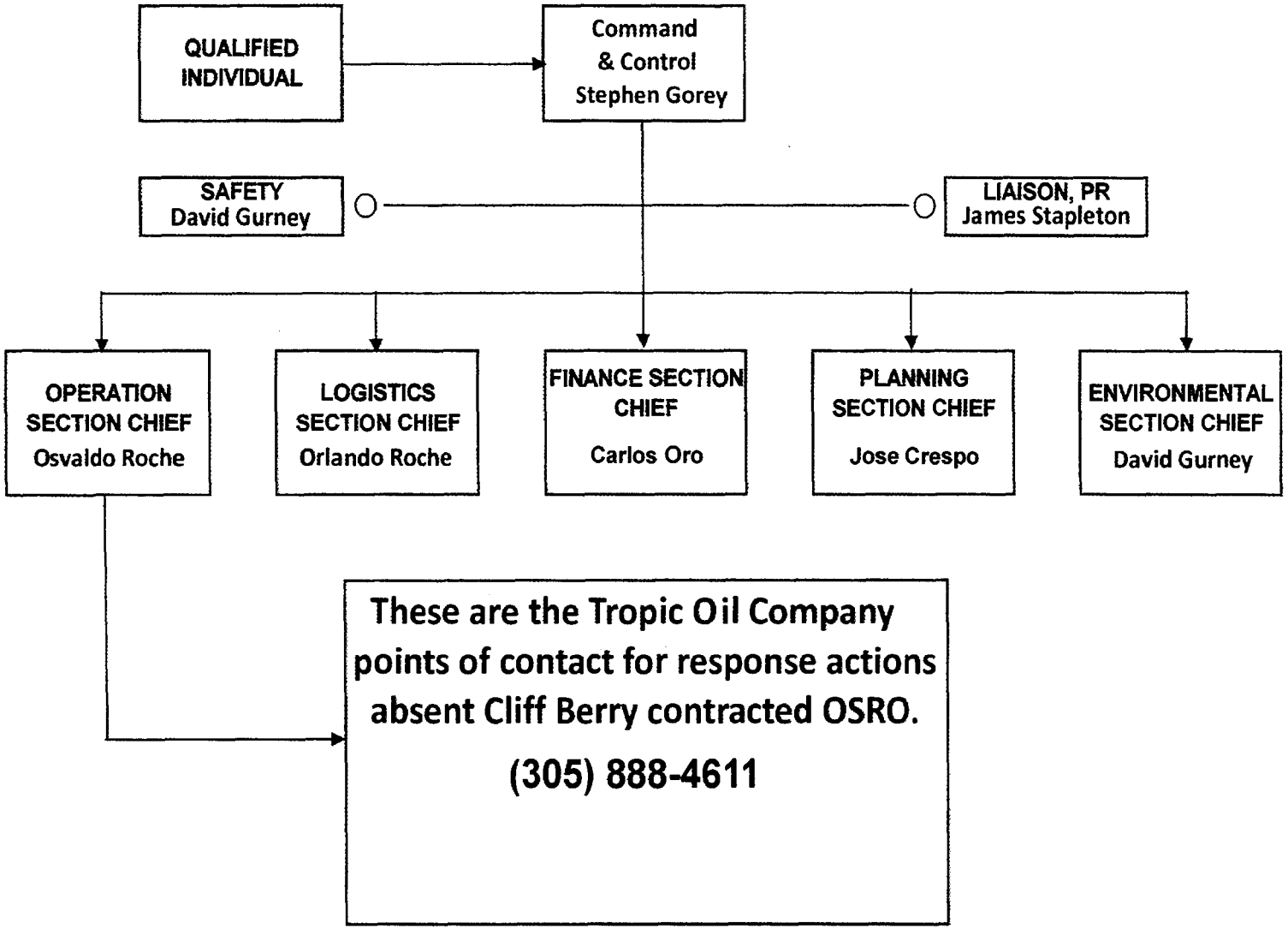
(4) Be trained in the responsibilities of the qualified Individual under the response plan.
(See 33CFR 154.1035 (c) pages 10-11, Training and Exercises)

(5) Tropic Trans provides each qualified individual and alternate qualified individual identified in the plan with a document designating them as a qualified individual and specifying their full authority to:

(a) Activate and engage in contracting with oil spill removal organization(s);
(b) Act as a liaison with the pre-designated Federal On-Scene Coordinator (OSC); and
(c) Obligate funds required to carry out response activities.
(d) Tropic may designate the OSRO contracted to fulfill the role of the qualified individual and the alternate qualified individual. The OSRO contracted will then identify a qualified individual and at least one alternate qualified individual who meet the requirements of this section.

E: For ORSO contract/contact see (Enclosure B), for Organizational Structure, see page 8


QUALIFIED INDIVIDUAL
OSRO INCIDENT COMMANDER
CLIFF BERRY
SAFETY
K. O'REILLY
LIAISON, PR
BRUCE BARTZ
OPERATION SECTION CHIEF
MARK HOOVER
LOGISTICS SECTION CHIEF
LESS MILLMAN
FINANCE SECTION CHIEF
ZULEIKA BEHAR
LORI SIEGERMAN
PLANNING SECTION CHIEF
DAVID SILLS
BERNIE DEVLIN
ENVIRONMENTAL SECTION CHIEF
GARY GIBSON
CBI PERSONNEL: RESPONSE TECHS, DRIVERS, HEAVY EQUIPMENT OPERATORS.
SUBCONTRACTORS WITH WRITTEN AGREEMENTS:
SOUTHERN WASTE SERVICES
FLORIDA SPILL RESPONSE
ENVIRONMENTAL RECOVERY, INC
INTERCOASTAL ENVIRONMENTAL SERVICES
JACKSONVILLE POLLUTION SERVICES
NATIONAL RESPONSE CORPORATION
ANA COASTAL


QUALIFIED INDIVIDUAL
Command & Control
Stephen Gorey
SAFETY
David Gurney
LIAISON, PR
James Stapleton
OPERATION SECTION CHIEF
Osvaldo Roche
LOGISTICS SECTION CHIEF
Orlando Roche
FINANCE SECTION CHIEF
Carlos Oro
PLANNING SECTION CHIEF
Jose Crespo
ENVIRONMENTAL SECTION CHIEF
David Gurney
These are the Tropic Oil Company points of contact for response actions absent Cliff Berry contracted OSRO.
(305) 888-4611

(iii) (3)

(IV) (A,B)

In the event of an "average most probable discharge," the mobile facility has adequate equipment on hand (see Enclosure B). However, in the event of a discharge that cannot be contained by the response equipment provided on the mobile facility, the OSRO defined in (Enclosure B) will be dispatched. OSRO is equipped with at least 200 feet of boom available within one hour of notification. For listing of equipment provided by the OSRO (see Enclosure B).

(4) (i, ii)

Fish and Wildlife Sensitive Areas

4 (A, C) See (Enclosure C) for map of area and species involved
4 (B) See (2) (ii) page 5-7 and section 3 this page for compliance to section B,
See (Enclosure B) for OSRO contact
See Enclosure C for special spill mitigation procedures

(4) (iii) (C)

40 CFR 112, appendix c, attachment c-iii

The facility operator will use the following formula or a comparable formula as described in Sec. 112.20(a) (3) to calculate the planning distance for oil transport on moving navigable water:
d=v x t x c
Where;
d: the distance downstream from a facility within which fish and wildlife and sensitive environments could be injured or a public drinking water intake would be shut down in the event of an oil discharge (in miles)
v: the velocity of the river/navigable water of concern (in ft/sec) as determined by Chezy-Manning's equation (see below and in Tables 1 and 2 of this attachment)
t: the time interval specified in Table 3 based upon the type of water body and location (in hours)
c: constant conversion factor 0.68 sec [omega] mile/hr [omega] ft (3600 sec/hr / 5280 ft/mile).

Chezy-Manning's equation is used to determine velocity:

v=1.5/n x r\2/3\ x s\1/2\;

Where;

v=the velocity of the river of concern (in ft/sec)
n=Manning's Roughness Coefficient from Table 1 of this attachment
r=the hydraulic radius; the hydraulic radius can be approximated for parabolic channels by multiplying the average mid-channel depth of the river (in feet) by 0.667

(5)

Disposal Plan

In the event of a minor, non-OSRO spill event, the materials used to mitigate any spill shall be gathered and placed within impermeable disposal containers (plastic bags, polymer drums, sealed pails, etc.) to prevent further contamination. Boom shall be wiped-down and stored for transport and final cleaning at the main facility. The Tropic main facility is co-located with a Ryder maintenance garage which is serviced daily by a certified waste disposal contractor (Jam Environmental & Vacuum Services, LLC, Fort Lauderdale, Florida). In the case of a major event, the OSRO contractor (Cliff Berry Inc.) is obligated to remove both, the mobile facility's spill mitigation materials as well as the additional material and equipment transported by them to the scene. In all scenarios, state-certified contractors complete the final disposition of contaminated material.

33CFR 154.1035 (C)
Training and Exercises
(1)

All new employees are subject to a 3 month training period. During these 3 months the new employee is placed with the most senior driver instructors. The new employee is schooled in safe driving techniques, equipment operations, use of safety equipment, hose handling, fire prevention and fire extinguishers, boom deployment and correct transfer procedures as outlined in 33 CFR and our Declaration of Inspection.
Additionally, on a monthly basis, safety and training meetings are held for all personnel for training and discussion on the Operations Manual and Facility Response Plan, safety procedures, orientation on new customer facilities, D.O.T. updates, and post-mishap and industry incident reviews. Training conducted complies with the hazard communication programs required by the Occupational Safety and Health Administration (OSHA) of the Department of Labor (DOL) (29 CFR 1910.1200), or the Environmental Protection Agency (EPA) (40 CFR 311.1).

Tropic certifies that our P.I.C. has had at least 48 hours of experience in transfer operations at a facility in operations to which this part applies. The person also has sufficient experience at the facility for which qualification is granted to enable Tropic to certify that the person's experience is adequate. The person has completed a training and qualification program established by Tropic and described in the Operations Manual in accordance with Sec. 154.310(a) (21), which provides the person with the knowledge and training necessary to properly operate the transfer equipment at the facility, perform the duties described below, follow the procedures required by this part, and fulfill the duties required of a person in charge during an emergency.
Tropic certifies that each P.I.C. has the knowledge of, and skills necessary to:

(1) Safely transfer each product assigned;
(2) Execute facility operating procedures as described in the Operations Manual;
(3) Employ vessel transfer systems, in general;
(4) Operate vessel transfer control systems, in general;
(5) Operate each facility transfer control system to be used.

Under this section, Tropic shall ensure the maintenance of records sufficient to document training of facility personnel and shall make them available for inspection upon request by the U.S. Coast Guard. Records for facility personnel will be maintained at the main facility for 3 years. Tropic, where applicable, shall ensure that our OSRO identified in this response plan shall meet the requirements of this subpart to maintain records sufficient to document training for the organization's personnel and shall make them available for inspection upon request by the facility's management personnel, the qualified individual, and U.S. Coast Guard Records must be maintained for 3 years following completion of training. The OSRO will also be checked that response personnel are trained to meet the Occupational Safety and Health Administration (OSHA) standards for emergency response operations in 29 CFR 1910.120.

(2)

The following will be adhered to by Tropic personnel:
(1) Qualified individual notification exercises (quarterly).
(2) Spill management team tabletop exercises (annually). In a 3-year period, at least one of these exercises will include a worst case discharge scenario.
(3) Equipment deployment exercises will occur semiannually for our facility owned and operated equipment.
(4) Emergency procedures exercise.
(5) The 1st and 2nd listed Q.I.'s make unannounced visits to dockside transfers at least 6 times per year. These visits are designed to test the P.I.C. of the transfer operation in deployment of booming devices and other equipment designed to mitigate any discharge and review the plan.
(6) Tropic designs the exercise program so that all components of the response plan are exercised at least once every 3 years. After participating in an Area exercise, Tropic shall ensure that adequate records of all required exercises are maintained at the facility for 3 years. Records shall be made available to the Coast Guard upon request.

(3)

During the annual hose testing and certification, all personnel are present for review of procedures for handling the hose connections from the mobile facility, hose-to-hose, and hose-to-receiver of product. Flanges and other equipment used during the transfer of product are checked and certified for continued use.

33 CFR 154.1035 (D)

Plan Review

On the first day of each fiscal year (1 October), the Tropic Oil Company Vice President, Operations, convenes an Operations Manual Review Board, which governs four pollution control documents:

- Spill Prevention, Control, and Countermeasure Plan (SPCC) [40 CFR Part 112]
- Oil Spill Removal Organization (OSRO) Emergency Response Agreement [OPA 90]
- Facility Response Plan (FRP) [40 CFR 112.20]
- FRP Operations Manual [33 CFR 154.310]

The FRP Operations Manual Review includes lessons-learned from each monthly Driver Standardization Meeting transcript, changes to listings of fish and wildlife and sensitive environments since last annual review, updates to local laws and regulations for all six ports served, and changes to emergency procedures or OSRO practices impacting training and equipment.

Upon approval of revisions, the VP, Operations, saves updates to the master file, records the completion of the annual review on the record of changes page, and submit the revisions to the response plan to the COTPs in the Tropic area of operations: Canaveral, Jacksonville, Key West, Miami, Everglades, and Tampa within 30 days.

Ad hoc FRP Operations Manual Reviews may be triggered at any time by legislative changes, OSRO notification, or to remedy inadequacies noted during a GIUE, an actual pollution incident, or annual spill response exercise. In such circumstances, the annual Operations Manual Review Board must still be convened.

33 CFR 154.1035 (E)

(1)

For a complete list of mobile facilities see (Enclosure D). Tropic Trans facilities are capable of transferring product to vessels ranging from motor yachts in excess of 30 feet in length and commercial freighters, cargo vessels and cruise ships up to 600 feet in length. A complete diagram of the piping and location of emergency equipment for the mobile facilities is located in (Enclosure D). **S**afety **D**ata **S**heets for all products transferred by the mobile facilities are located in (Enclosure F).

(2)

List of 24 hour contacts is located on page 4 of this manual.

(3)

Equipment lists and records, All Tropic Transportation fuel and lube delivery vehicles carry an immediate-action average most probable discharge package, which includes boom, plastic bags, absorbent pads, pails, lids, and tools. See (Enclosure B) and/or page (5) (2) (ii), for **equipment stored** on Tropic Trans vehicles. All marine-qualified drivers (P.I.C.) are trained in immediate-action procedures and receive monthly standardization training and evaluation. See page 4, (1) (a), for a list of Q.I.'s and P.I.C. (Enclosure G). Tropic is also contracted with Cliff Berry, Inc. (Enclosure B), which is classified by the U. S. Coast Guard and is listed as number 48 in the OSRO Classification Listing.

CBI (Cliff Berry, Inc.) is contracted with NRC (National Response Corporation), which means CBI can deploy their local assets. Specifically, CBI have access to NRC's 1000 feet of harbor boom, a 48-inch drum skimmer (1400 bbl EDRC), 300 bbls or temporary storage, a 20 foot work boat and a portable barge set located at Key West Pipeline at the USCG base. Additionally, there is 2000 feet of harbor boom at the Dolphin Research Center in Marathon. In order to deploy these assets, CBI have contracted with Key West Harbor Services, who is located in Key West and also has access to NRC's staged equipment.

(4)
Communication Plan

There is virtually always direct voice communication between the Tropic P.I.C. and the vessel's P.I.C. during the transfer. In the event where direct voice communication is not possible, the secondary means shall be radio communication, which is supplied by the vessel. In the case of a worst-case spill event, communication is supplied by the ORSO.

(5)
Health and Safety

Each mobile facility is equipped with safety equipment, including--but not limited to--rain gear, gloves, ear & eye protection, hard hats, and boots. Employees are trained to mitigate any accidental discharge, but in cases where their personal safety and the safety of others are in question, they are to move to a safe area and begin the emergency contact procedure. Training is conducted monthly and complies with the hazard communication programs required by the Occupational Safety and Health Administration (OSHA) of the Department of Labor (DOL) (29 CFR 1910.1200) or the Environmental Protection Agency (EPA) (40 CFR 311.1). In these monthly safety and standardization meetings, testing and discussion on the Operations Manual, Facility Response Plan, safety procedures, orientation on new customer facilities, D.O.T. updates, and post-mishap and incident reviews is documented.

(6)

ACRONYM	DEFINITION
AC	Area Committee
ACP	Area Contingency Plan
ActBalt	Activities Baltimore, U.S. Coast Guard
AIRSTA	Coast Guard Air Station
AOR	Area of Responsibility
ART	Alternative Response Technologies
ATSDR	Agency for Toxic Support and Disease
BNTM	Broadcast Notice to Mariners
CERCLA	Comprehensive Environmental Response, Compensation and Liability Act of 1980
CFR	Code of Federal Regulations
COTP	Captain of the Port
CWA	Clean Water Act
DNR	Maryland Department of Natural Resources
DOI	Department of the Interior
DRAT	District Response Advisory Team (Coast Guard)
DRG	District Response Group (Coast Guard)
EEZ	Exclusive Economic Zone
EMT	Emergency Medical Technician
EOC	Emergency Operations Center
EPA	Environmental Protection Agency
ERT	Emergency Response Teams
ESI	Environmentally Sensitive Index
FOG	Field Operations Guide
FOSC	Federal On-Scene Coordinator
FRP	Facility Response Plan
FWPCA	Federal Water Pollution Control Act
GIS	Geographic Information System
HASP	Health and Safety Plan
HAZWOPER	Hazardous Waste Operations and Emergency Response
HHS	Health and Human Services
IAP	Incident Action Plan
IC	Incident Commander
ICP	Incident Command Post
ICS	Incident Command System
IO	Information Officer
JIC	Joint Information Center
LO	Liaison Officer

MAC	Multi-Agency Coordination (Unit)
MACS	Multi-Agency Coordination System
MDE	Maryland Department of the Environment
MOA	Memorandum of Agreement
MOU	Memorandum of Understanding
MSC	Marine Safety Center
NCP	National Contingency Plan
NIIMS	National Interagency Incident Management System
NOAA	National Oceanic and Atmospheric Administration
NPFC	National Pollution Fund Center
NRDA	Natural Resource Damage Assessment
NRT	National Response Team
OPA 90	Oil Pollution Act of 1990
OPS	Office of Pipeline Safety
OSC	On Scene Coordinator
OSHA	Occupational Safety and Health Administration
OSP	Office of Oil Spill Prevention
OSROS	Oil Spill Removal Organizations
POLREP	Pollution Report
QI	Qualified Individual
RP	Responsible Party
RCP	Regional Contingency Plan
RRT	Regional Response Team
SAV	Submerged Aquatic Vegetation
SO	Safety Officer
SONS	Spill of National Significance
SOSC	State On Scene Commander
SSC	NOAA Scientific Support Coordinators
SUPSALV	US NAVY Supervisor Salvage
UC	Unified Command
USC	United States Code
VRP	Vessel Response Plan

Appendices

For the purpose of identifying appendices quoted in this FRP, please refer to the Tropic Operations manual for the following:

(i)	Notice of Discharge Form	A
(ii)	OSRO Contract & Equipment List	B
(iii)	List and Maps of Sensitive Areas	C
(iv)	Physical Description of Facility & Piping Diagram	D
(v)	Sizes, Types of Vessels	E
(vi)	SDS	F
(vii)	List of Personnel (P.I.C.)	G
(viii)	Cargo Information	H
(ix)	Declaration of Inspection	I
(x)	Digest of Pollution Laws	J
(xi)	Hose Testing Log	K
(xii)	Correspondence	L

Florida Department of Environmental Protection

Marjory Stoneman Douglas Building
3900 Commonwealth Boulevard
Tallahassee, Florida 32399-3000

Rick Scott
Governor

Carlos Lopez-Cantera
Lt. Governor

Noah Valenstein
Secretary

6/19/2018

Cliff Berry, Inc.
Mr. Cliff Berry Sr.
851 Eller Drive
Fort Lauderdale, FL 33316

RE: Renewal of Certificate for Discharge Cleanup Organization

Dear Mr. Berry:

You are currently listed as an Approved Discharge Cleanup Organization (DCO) for the State of Florida. We are extending the expiration date of your DCO Certificate to ***June 30, 2019.*** Please notify this office of any significant changes in your capabilities as a DCO, as well as, changes in addresses, phone numbers, or contacts.

Retain a copy of this letter with your most current DCO certificate as evidence of your certification status. If you have any questions, or wish to provide updates, please contact Mr. Shane Gibbs at (850) 245-2872 or via email at Shane.Gibbs@dep.state.fl.us. You may also contact your District Emergency Response Manager to address any questions or issues regarding this program.

Sincerely,

John Johnson, Director
Office of Emergency Response

CBI Cliff Berry, Inc. Environmental Services

July 20, 2018

EMERGENCY RESPONSE AGREEMENT

24 HOUR EMERGENCY NUMBER
800.899.7745

By and Between

CBI

CLIFF BERRY, INC.
P.O. Box 13079
Port Everglades Station
Fort Lauderdale, FL 33316
Office: 954.763.3390
Fax: 954.764.0415

And

TROPIC OIL COMPANY
10002 Northwest 89th Avenue
Miami, FL 33178
ATTN: Osvaldo Roche
ORoche@tropicoil.com
305-888-4611

CUSTOMER NUMBER #: 12045

CLIFF BERRY, INC.
EMERGENCY RESPONSE SERVICES

This agreement for Emergency Response Services (the "Agreement") is made this **20th day of July, 2018** between **CLIFF BERRY, INC.** with its principal offices located at 851 Eller Drive, Fort Lauderdale, FL 33316 and **TROPIC OIL COMPANY** (hereafter referred as the "Client") with its principal offices located at 10002 Northwest 89th Avenue, Miami, FL 33178.

RECITALS

WHEREAS Cliff Berry, Inc. has been awarded a contract to perform emergency response services on an as-called basis for certain companies (hereinafter referred to as the "Client"); and whereas Cliff Berry, Inc. shall be hereinafter referred to as CBI; and

WHEREAS CBI represents that it is capable of providing additional emergency response resources to Client which services include, but may not be limited to, emergency response services reasonably required to mitigate oil, chemical and other hazardous or non-hazardous substances released into the environment on an as-called basis, twenty-four (24) hours per day, seven (7) days per week; and

WHEREAS CBI wishes to establish in advance the terms and procedures whereby the Client may, from time to time, contract emergency response services under the Prime Agreement.

NOW THEREFORE, in consideration of the mutual covenants contained herein and for other good and valuable consideration, the receipt and sufficiency of which are hereby acknowledged, the Parties, intending to be legally bound, do hereby agree as follows:

SCOPE OF WORK

The scope of work to be performed by CBI shall be determined by the Parties at the time the Client requests the services and as authorized by the Client's authorized representative. A request from the Client for CBI to perform services under this agreement constitutes an "ORDER" placed for these services. The Client acknowledges and agrees that CBI may, at its sole discretion, expand, modify, and/or discontinue the services with appropriate notice to the Client. If such changes result in an increase or decrease in costs, these costs adjustments shall be documented in a written change order, signed by the Parties.

Should the Client discontinue the request for services once the ORDER has been placed and authorization to proceed has been given, the Client concedes that CBI has deployed equipment, personnel and managerial staff in support of the service order. Accordingly, the Client agrees to mobilization charges equivalent to a four hour minimum that will be applied to the service order. In the event that CBI cannot respond due to uncontrollable circumstances, CBI shall notify the Client in a judicious manner.

The services to be provided by CBI include, but are not limited to:

- Site evaluation, decontamination and restoration
- Containment, recovery, repackaging and removal of Hazardous & Non-Hazardous substances
- Transportation, storage, treatment or disposal of recovered wastes
- Technical services, including sampling, laboratory analysis, and other related services
- Training and mock spill drill deployments

EMERGENCY NOTIFICATION

The Client may request the services of CBI by telephone - 24 hours/day - 7 days/week - by calling its emergency number **800.899.7745**. When the Client requests CBI take action in an Emergency Response, such a request shall constitute an "ORDER" which may be accepted or rejected by CBI.

When the ORDER has been placed, CBI shall provide the Client with a written "JOB AUTHORIZATION, ACCEPTANCE OF TERMS AND CONDITIONS FORM" either in person or via fax to be signed by an authorized agent of the Client empowering CBI to perform the scope of work.

When placing an ORDER, the Client shall identify the location and preliminary scope of services requested. Initial information may include, to the extent practicable:

- ✓ The surface impacted (soil, concrete, pavement, storm drains, etc.)
- ✓ The substance released
- ✓ The products chemical name and trade name
- ✓ Amount of release
- ✓ Name of Party's on-scene representative

Client is responsible for advising all federal, state, local, and any other governing authorities of the spill event occurrence. (See Emergency Response Spill – Reporting & Notification Requirements)

CHANGE ORDER

CBI may, at any time, **by verbal order followed by a written change order** make specific changes in the scope of work under any ORDER accepted by CBI. Should such changes involve additional services on the part of CBI, then CBI shall submit an estimate of the amounts of additional personnel and equipment it expects to be utilized for such changes. CBI will not proceed with the changes until it has received written authorization from the Client unless the ORDER is issued under emergency conditions, whereby a verbal ORDER followed by a written fax to CBI's corporate office (954-763-8375) shall control.

In an emergency where the safety of persons or property is threatened, CBI shall act, at its sole discretion, to prevent threatened damage, injury or loss to persons or property. Any such actions must be prudent, cost effective and justifiable. Such actions will be compensated in accordance with this agreement.

SITE ACCESS

The Client shall be responsible for securing all necessary approvals, judicial and/or administrative orders necessary to ensure CBI legal access to the site.

RETAINER

CBI shall charge a yearly retainer fee of **$ 450.00** which shall be prepaid before any services, equipment, or materials are made available to the Client. The retainer is required to offset the cost of storage, maintenance, training and administrative fees. If CBI is called upon to respond to a spill, the annual fee shall be credited to the cleanup charge.

LICENSING

CBI warrants that it is properly licensed and has the requisite skills and related expertise to provide the services described or reasonably implied in this agreement.

SUPPLEMENTARY TERMS AND CONDITIONS

MANIFEST AND PRODUCT PROFILING:
CBI will provide the Client a manifest for all waste removed from the spill site. CBI reserves the right to determine the exact amount of waste transported and disposed thereof. Costs are determined based on the generator's waste material profile sheet and certification of the representative sample submitted. Should the waste be different from the sample submitted, the Client will be responsible for any additional disposal surcharges assessed by the disposal facility or incurred during subsequent transportation.

PERSONNEL:
All personnel sent on-site from CBI are technical personnel with the capacity of performing the entire operation on a given job. If, for any reason, due to the Client's collective bargaining agreements, or if the Client deems it necessary to utilize other personnel in the performance of the work, such personnel shall be furnished by and at the sole expense of the Client. Such additional personnel shall work under the direction and supervision of the Client and shall not be employees of CBI.

INSURANCE:
CBI shall observe and comply with all applicable laws in the state where such work is performed relating to Worker's Compensation and Longshoreman's and Harbor Worker's Insurance coverage for its employees and shall carry public liability insurance.

TAXES:
Unless otherwise indicated, all applicable federal, state, local taxes and tariffs are to be added to the quoted price(s).

RENTAL:
The Client assumes and agrees to be liable for all risks of physical loss or damage (other than ordinary wear and tear due to use) to the equipment after delivery to the Client's work site until returned to CBI's possession at point of origin. If such equipment is lost or damaged so as to be unrepairable, the Client shall pay CBI its replacement cost.

TERMS OF PAYMENT:
Unless otherwise stated, terms are **NET UPON RECEIPT OF INVOICE**. The parties further acknowledge making payment for all services provided by CBI as outlined under the terms set forth in this agreement. Failure to make timely payment will result in a 1.5% monthly interest penalty which is to be added to the outstanding balance, as well as any cost incurred during the process of securing payment, including but not limited to attorney's fees and the cost of collection.

PROPOSAL ACCEPTANCE

By my signature below I acknowledge that I have read the proposal and agree to its terms, including all those set forth above.

COMPANY NAME: **TROPIC OIL COMPANY**

CLIENT SIGNATURE:

CLIENT PRINTED: Ronaldo Rocha

TITLE: PORT MANAGER

DATE: 07/20/18

Witnessed: **CLIFF BERRY, INC.**

Authorized Signature:

Signature Printed: Jon Hines

Title: Area Manager for South Florida

Florida Department of State

DIVISION OF CORPORATIONS

Detail by Entity Name

Florida Profit Corporation
TROPIC OIL COMPANY

Filing Information

Document Number	167934
FEI/EIN Number	59-0667006
Date Filed	02/06/1952
State	FL
Status	ACTIVE
Last Event	AMENDMENT
Event Date Filed	01/06/1989
Event Effective Date	NONE

Principal Address

10002 N W 89TH AVENUE
MIAMI, FL 33178-8497

Changed: 06/24/1992

Mailing Address

10002 N W 89TH AVENUE
MIAMI, FL 33178-8497

Changed: 01/20/2010

Registered Agent Name & Address

LEVASSER, GEORGE E
10002 NW 89TH AVENUE
MIAMI, FL 33178

Name Changed: 06/12/1996

Address Changed: 06/12/1996

Officer/Director Detail

Name & Address

Title D

LEVASSER, GEORGE E
967 NE 99 ST.
MIAMI SHORES, FL

Title D

GOREY, STEPHEN J
1880 NW 103 AVE
PLANTATION, FL 33322

Annual Reports

Report Year	Filed Date
2016	03/08/2016
2017	01/10/2017
2018	03/06/2018

Document Images

03/06/2018 -- ANNUAL REPORT	View image in PDF format
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05/16/1995 -- ANNUAL REPORT	View image in PDF format

Florida Department of State, Division of Corporations

ENVIROS

Warning Notice - WRN04-0054

Warning Notice - Details | Location | Documents

Warning Notice #:	WRN04-0054	Status:	Complied
Warning Type:	NOV Warning	Violation Date:	Nov 19, 2003
Respondent Name:	Peterson Fuel CorporationTropic Oil Company	Completed Date:	Nov 17, 2004
Facility:	Peterson Fuel Corporation		
Issuing Officer:	Norris B. Taylor		
Issuing Officer Phone:	(954) 519-1457		
Division:	Pollution Prevention & Remediation		
Division Section:	Environmental Response		

Violations

Code Section Number	Section Excerpt Name	Excerpt Text	Violation Description	Corrective Action
27-353(g)(2)	Before 3/5/08 Haz Mat discharge	"(g) No person shall cause, permit, suffer, or allow the usage, storage, abandonment or disposal of hazardous material: (2) In a manner which causes, or may cause, an unauthorized release, discharge or disposal of hazardous material."	Respondents allowed the discharge of approximately 50 gallons of diesel fuel to the New River from a fueling barge.	Respondents shall review fueling and transfer procedures and provide a copy to DPEP for review and comment.
27-355(a)(1)	Before 3/5/08 Notification: Release of Haz Mat or Discovery of Contamination	"... In the event of an unauthorized release of a hazardous material to the environment in an amount that is above the reportable quantity threshold, or the discovery of the presence of any contaminant in the air, waters, soils or other natural resource in Broward County at a level which exceeds applicable federal, state or local regulatory cleanup target level or for which EPGMD has determined poses an actual threat or potential risk to water supplies, the environment or to health and safety, the responsible party shall take the necessary measures to stabilize the situation and shall immediately report such incidents by telephone to EPGMD. Written notification of verbal reports to EPGMD must be provided within seven (7) calendar days. Written notification shall include at a minimum the location of the release, a brief description of the incident that caused the release or discovery, a brief description of the action taken to stabilize the situation, and any laboratory analysis ..."	Respondents caused the release of approximately 50 gallons of diesel fuel into the New River in the general area of 413 SW 3 Ave and 430 SW 3 Ave in Fort Lauderdale. During the clean-up phase the facility (Peterson Fuel Corporation) lacked adequate clean up resources.	Respondents shall prepare and submit to DPEP, within 30 days, a spill contingency plan that is designed to immediately notify DPEP of any release; provide containment for impacted vessels; and initiate adequate and appropriate clean up.

DEPARTMENT OF LABOR

OSHA English | Spanish

Find it in OSHA

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Establishment Search

Reflects inspection data through 09/18/2018

This page enables the user to search for OSHA enforcement inspections by the name of the establishment. Information may also be obtained for a specified inspection or inspections within a specified SIC.

⚠ **Note**: Please read important information below regarding interpreting search results before using.

Search By:

Your Establishment search returned 0 results.

Establishment: Tropic Oil Company

(This box can also be used to search for a State Activity Number for the following states: NC, SC, KY, IN, OR and WA)

State: All States | Fed & State

OSHA Office: All Offices

Case Status: ◉ All ○ Closed ○ Open

Violation Status: ◉ All ○ With Violations ○ Without Violations

Inspection Date

Start Date: September 1 2013

End Date: September 20 2018

Submit Reset

Can't find it?

Wildcard use %
Basic Establishment Search Instructions
Advanced Search Syntax

NOTE TO USERS

The Integrated Management Information System (IMIS) was designed as an information resource for in-house use by OSHA staff and management, and by state agencies which carry out federally-approved OSHA programs. Access to this OSHA work product is being afforded via the Internet for the use of members of the public who wish to track OSHA interventions at particular work sites or to perform statistical analyses of OSHA enforcement activity. It is critical that users of the data understand several aspects of the system in order to accurately use the information.

events occur in the course of agency activities. Until cases are closed, IMIS entries concerning specific OSHA inspections are subject to modification and correction and updating, particularly with regard to citation items, which are subject to modification by amended citations, settlement agreements, or as a result of contest proceedings. THE USER SHOULD ALSO BE AWARE THAT DIFFERENT COMPANIES MAY HAVE SIMILAR NAMES AND CLOSE ATTENTION TO THE ADDRESS MAY BE NECESSARY TO AVOID MISINTERPRETATION.

The Integrated Management Information System (IMIS) is designed and administered as a management tool for OSHA to help it direct its resources. When IMIS is put to new or different uses, the data should be verified by reference to the case file and confirmed by the appropriate federal or state office. Employers or employees who believe a particular IMIS entry to be inaccurate, incomplete or out-of-date are encouraged to contact the OSHA field office or state plan agency which originated the entry.

UNITED STATES
DEPARTMENT OF LABOR

Occupational Safety and Health Administration
200 Constitution Ave NW
Washington, DC 20210
800-321-6742 (OSHA)
TTY
www.OSHA.gov