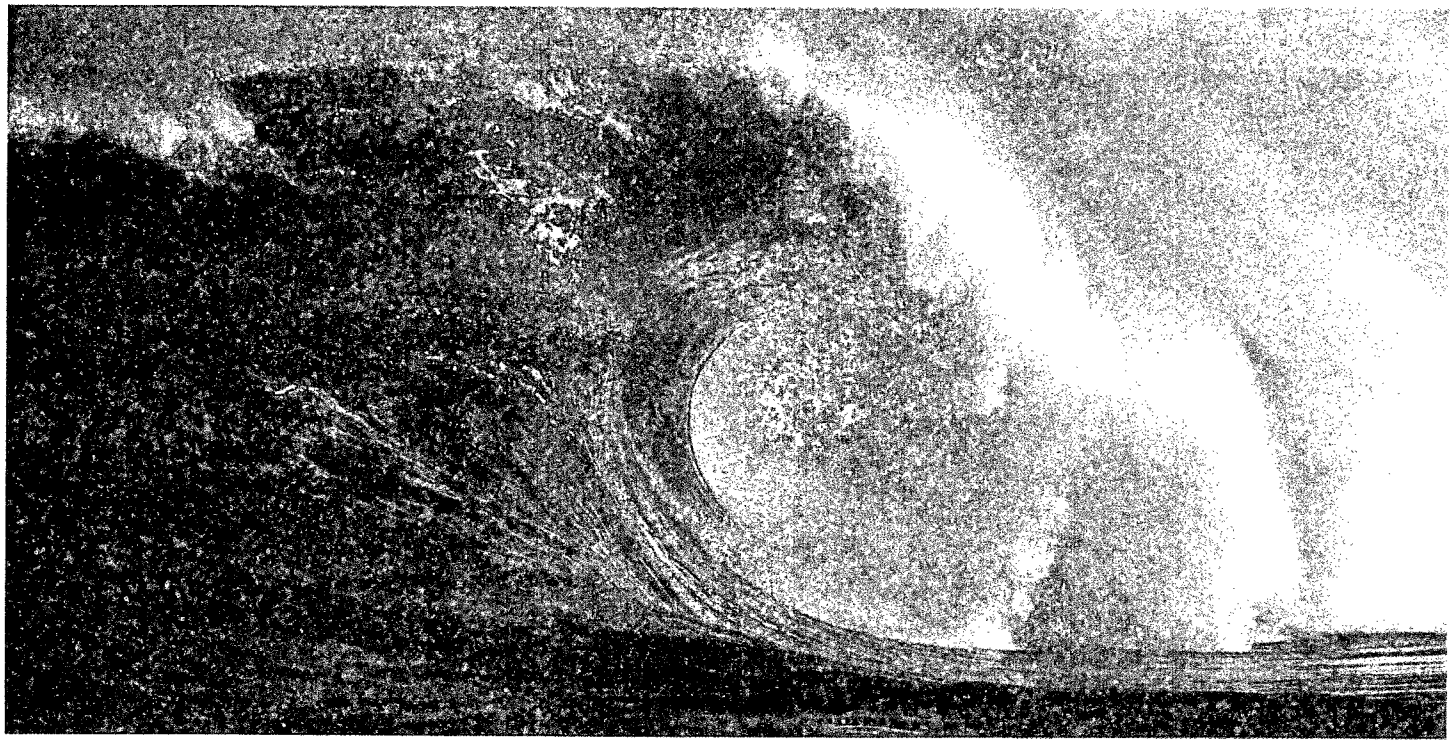


USFilter

USED OIL PROCESSING PERMIT APPLICATION
POMPANO BEACH FACILITY

USFILTER RECOVERY SERVICES MID-ATLANTIC INC.
POMPANO BEACH, FLORIDA

SEPTEMBER 2002

a VIVENDI water company

USFilter

RECOVERY SERVICES
1105 NORTH POINT BOULEVARD
SUITE 310
BALTIMORE, MD 21224

TELEPHONE 410-284-1717
FACSIMILE 410-285-8264

September 30, 2002

Florida Department of Environmental Protection
Bureau of Solid and Hazardous Waste
Hazardous Waste Regulation Section
Attn: Environmental Administrator – MS 4560
2600 Blairstone Road
Tallahassee, FL 32399-2400

Re: Application for Permit Renewal
USFilter Recovery Services Mid-Atlantic, Inc.
Pompano Beach Used Oil Processing Facility

USFilter Recovery Services Mid-Atlantic is pleased to submit two copies of our application for renewal of the Used Oil Processing Permit for our Pompano Beach Facility. One copy is marked as the original, the second is marked as a copy. As required, an additional copy has been sent to the FLDEP Southeast District Office in West Palm Beach. As a separate part of the application procedure, a copy of the Closure Cost Estimate, stamped by a Florida PE, has been previously submitted to Mr. O.J. Carlo at the Southeast District Office.

Any questions concerning this application may be directed as follows:

Ms. Lisa Sendek
USFilter Engineering & Construction
250 Airside Drive
Moon Township, PA 15108
Tel: 412-809-6737

Thank you for your attention to this submittal.

Sincerely,
USFilter Recovery Services Mid-Atlantic

Sammy Cooper
Sr. Vice President, Southeast Region

CC: FLDEP Southeast District – Certified Mail 7099 3400 0017 3349 9833
Cathy Porthouse
Tim Ford
Steve McGuire / Lisa Sendek

USFilter

USED OIL PROCESSING PERMIT
FOR USFILTER RECOVERY SERVICES MID-ATLANTIC INC.

USFILTER RECOVERY SERVICES MID-ATLANTIC INC.
POMPANO BEACH, FLORIDA

SEPTEMBER 2002

PREPARED BY:
LISA GIBBONS

APPROVED BY:
STEVE MCGUIRE

6109-03

USFilter

Engineering & Construction
Airside Business Park
250 Airside Drive
Moon Township, PA 15108
412.809.6000 phone
412.809.6075 fax

VIVENDI water company

STATE OF FLORIDA
DEPARTMENT OF ENVIRONMENTAL PROTECTION

REQUEST FOR TRANSFER OF PERMIT

PERMIT NUMBER H006-307677 **DATE ISSUED** Oct. 20 1997 **DATE EXPIRES** Oct. 20 2002

SOURCE NAME: USFilter Recovery Services Mid-Atlantic Inc. - Pompano Beach

APPLICANT NAME: Mr. Timothy Ford

TITLE: VP ES&H

MAILING ADDRESS: 1105 North Point Blvd. Suite 310

Baltimore, MD. 21224

TELEPHONE: (410)284-1717

PROJECT ENGINEER'S NAME: Mr. Sammy Cooper

PROJECT ENGINEER'S MAILING ADDRESS: 1280 Northeast 48th Street

Pompano Beach, Fl. 33064

PROJECT ENGINEER'S TELEPHONE: (954)785-2320

The undersigned hereby notifies the Department of his having acquired title to this pollution source. He further states that he has examined the application and documents submitted by the current permittee the basis on which Permit Number H006-307677 was issued by the Department, and states that they accurately and completely describe the permitted activity or project. He further states that he is familiar with the permit, agrees to comply with its terms and conditions, and agrees to assume the rights and liabilities contained therein. He also agrees to promptly notify the Department of any future change in ownership of, or responsibility for, the permitted activity or project.

Sworn to and subscribed before me at Baltimore

County, Maryland.

this 12th **day of** July, **20**02.

Timothy Ford
Signature of Applicant*

V.P. ES&H
Title

Madonna M. Thomas
Notary Public

Date: 12 July 2002

My commission expires 4/1/06

MADONNA M. THOMAS
NOTARY PUBLIC STATE OF MARYLAND
My Commission Expires April 1, 2006

***Attach letter of authorization if other than owner or corporate officer.**

DEP Form 62-1.201(1), effective November 30, 1982.

STATE OF FLORIDA
DEPARTMENT OF ENVIRONMENTAL PROTECTION

APPLICATION OF TRANSFER OF PERMIT

PERMIT NUMBER H006-307677 **DATE ISSUED** Oct. 20 1997 **DATE EXPIRES** Oct. 20 2002

NOTIFICATION OF SALE OR LEGAL TRANSFER

SOURCE NAME: Magnum Environmental Services **COUNTY: Broward**

SOURCE LOCATION: 1280 Northeast 48th Street **CITY: Pompano Beach, Fl. 33064**

PERMITTEE NAME: Magnum Environmental Services **TITLE: NA**

MAILING ADDRESS: 1280 Northeast 48th Street
Pompano Beach, Fl. 33064

The undersigned hereby notifies the Department of the sale or legal transfer of this pollution source. He further agrees to assign his rights as permittee to the applicant in the event the Department agrees to the transfer of permit.

Sworn to and subscribed before me at Plant City, FL

County, Hillsborough.

this 12 **day of** July, **20** 02.

Signature of Permittee

Director of Operations
Title

Notary Public

Date: 07-12-02

My commission expires _____.

TERESA A. HANDLEY
Notary Public, State of Florida
My comm. expires Oct. 1, 2002
Comm. No. CC781204

DEP Form 62-1.201(1), effective November 30, 1982.

APPLICATION FORM FOR A USED OIL PROCESSING FACILITY PERMIT

Part I

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

A. General Information

1. New_____ Renewal X Modification _____ **Date old permit expires** 10/20/2002

2. Revision number 1

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

- _ generators (Subpart C)
- X transporters (Subpart E)
- _____ burners of off-spec used oil (Subpart G)
- _____ marketers (Subpart H)

or

- X are disposing of used oil (Subpart I)

4. Date current operation began: June 21, 2002

5. Facility name: USFilter Recovery Services Mid-Atlantic, Inc.

6. EPA identification number: FLD984262410

7. Facility location or street address: Pompano Beach, 1280 Northeast 48th Street

8. Facility mailing address: 1280 Northeast 48th Street, Pompano Beach, FL 33064
   Street or P.O. Box City State Zip Code

9. Contact person: Mr. Dennis Williams Telephone: (954) 785-2320
   Title: _____
   Mailing Address: 1280 Northeast 48th Street, Pompano Beach, FL 33064
   Street or P.O. Box City State Zip Code

10. Operator's name: USFilter Recovery Services Mid-Atl Telephone: (401) 284-1717
    Mailing Address: 1105 Northpoint Boulevard, Suite 310, Baltimore, MD 21224
    Street or P.O. Box City State Zip Code

11 Facility owner's name: USFilter Recovery Services Mid- Telephone: (401) 284-1717
   Mailing Address: 1105 Northpoint Boulevard, Suite 310, Baltimore, MD 21224
   Street or P.O. Box City State Zip Code

12 Legal structure:

- X corporation (indicate state of incorporation) Delaware
- _____ individual (list name and address of each owner in spaces provided below)
- _____ partnership (list name and address of each owner in spaces provided below)
- _____ other, e.g. government (please specify) _____

If an individual, partnership, or business is operating under an assumed name, enter the county and state where the name is registered: County_____ State _____

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

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

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

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

13 Site ownership status: **X**]owned [ ]to be purchased [ ]to be leased ____ years
[ ]presently leased; the expiration date of the lease is:_____

If leased, indicate:
Land owner's name:_____
Mailing Address:
_____
Street or P.O. Box City State Zip Code

14 Name of professional engineer **Norbert J. Lindner,** Registration No. **50903**
Mailing Address: **Moon Township, PA 15108**
_____
Street or P.O. Box City State Zip Code
Associated with: **250 Airside Drive**

B. SITE INFORMATION

1. Facility location:
County: Broward
Nearest community: Pompano Beach, Fl
Latitude: 26°17'21"N Longitude: 80°06'23"w
Section: 13 Township: 48 South Range: 42 East
UTM # 17 /589150/ 2907850/ /

2. Facility size (area in acres): 2.45

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

C. OPERATING INFORMATION

1. Hazardous waste generator status (SQG, LQG) LQG

2. List applicable EPA hazardous waste codes:

F001	D001	D018
F003	D002	
F005	D006	
F006	D007	
F007	D008	

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

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

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

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

5. The following parts of the facility's operating plan should be included as attachments to the permit application. (See item 5 on pages 4 and 5):
   a. An analysis plan which must include:
      (i) a sampling plan, including methods and frequency of sampling and analyses;
      (ii) a description of the fingerprint analysis on incoming shipments, as appropriate; and
      (iii) an analysis plan for each outgoing shipment (one batch/lot can equal a shipment, provided the lots are discreet units) to include: metals and halogen content.

   The analysis plan is labeled as Attachment 3

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

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

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

   The tracking plan is included as Attachment 5

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

   The preparedness and prevention plan is labeled as Attachment 6

7. Attach a copy of the facility's Contingency Plan. This requirement should describe emergency management personnel and procedures and may be met using a modifiying or expounding on an existing SPCC plan or should contain the items listed in the Specific Instructions. (see item 7 on pages 5 and 6).

The contingency plan is labeled as Attachment 6

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

The unit management description is labeled as Attachment 7

9. Attach a copy of the facility's Closure plan and schedule. This plan may be generic in nature and will be modified to address site specific closure standards at the time of closure. (See item 9, pages 6 and 7).

The closure plan is labeled as Attachment 8

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

A description of employee training is labeled as Attachment 9

DEP Form#	62-710.901(a)
Form Title	Used Oil Processing Facility Permit Application
Effective Date	December 23, 1996

APPLICATION FORM FOR A USED OIL PROCESSING PERMIT

PART II - CERTIFICATION

TO BE COMPLETED BY ALL APPLICANTS

Form 62-710.901(a). Operator Certification

USFilter Recovery Services Mid-Atlantic, Inc.

Facility Name:_____ EPA ID# **FLD984262410**

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gathered and evaluated the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment or knowing violations. Further, I agree to comply with the provisions of Chapter 403, Florida Statutes, Chapters 62-701 and 62-710, F.A.C., and all rules and regulations of the Department of Environmental Protection

Signature of the Operator or Authorized Representative*

Sammy Cooper

Sammy Cooper, Sr. Vice President, Southeast Region USFRSMA

Name and Title (Please type or print)

Date: 10-1-02 Telephone: **(954) 785-2320**

* If authorized representative, attach letter of authorization.

DEP Form#	62-710.901(b)
Form Title	Used Oil Processing Facility Permit Application
Effective Date	December 23, 1996

APPLICATION FROM FOR A USED OIL PROCESSING PERMIT

PART II - CERTIFICATION

Form 62-710.901(b). Facility Owner Certification

USFilter Recovery Services Mid-Atlantic, Inc.
Facility Name: _____ EPA ID# **FLD984262410**

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

Sammy Cooper

Signature of the Facility Owner or Authorized Representative*

Sammy Cooper, Sr. Vice President, Southeast Region USFRSMA

Name and Title (Please type or print)

Date: 10-1-02 Telephone: **(954) 785-2320**

* If authorized representative, attach letter of authorization.

DEP Form#	62-710.901(c)
Form Title	Used Oil Processing Facility Permit Application
Effective Date	December 23, 1996

APPLICATION FROM FOR A USED OIL PROCESSING PERMIT

PART II - CERTIFICATION

Form 62-710.901(c) Land Owner Certification

Facility Name: **USFilter Recovery Services Mid-Atlantic. Inc.** EPA ID# **FLD984262410**

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

Signature of the Land Owner or Authorized Representative*

Sammy Cooper , Sr. Vice President, Southeast Region USFRSMA

Name and Title (Please type or print)

Date: 10-1-04 Telephone: **(954) 785-2320**

* If authorized representative, attach letter of authorization.

DEP Form#	62-710.901(d)
Form Title	Used Oil Processing Facility Permit Application
Effective Date	December 23, 1996

APPLICATION FORM FOR A USED OIL PROCESSING PERMIT

PART II - CERTIFICATION

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

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

1. Certification of secondary containment adequacy (capacity), structural integrity (structural strength), and underground process piping for storage tanks, process tanks, and container storage.
2. Certification of leak detection.
3. Substantial construction modifications.

X 4. Those elements of a closure plan requiring the expertise of an engineer.

5. Tank design for new or additional tanks.

Y 6. Recertification of above items.

Please Print or Type

X Initial Certification Y Recertification

1. DEP Facility ID Number: **FLD984262410** 2. Tank Numbers: **See Tank List**

3. Facility Name: **USFilter Recovery Services Mid Atlantic-Pompano Beach**

4. Facility Address: **1280 NE 48th Street, Pompano Beach, FL 33064**

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

Norbert J. Lindner

Signature **Norbert Joseph Lindner, P.E.**

Name (please type)

Florida Registration Number: **50903**

Mailing Address: **250 Airside Drive**

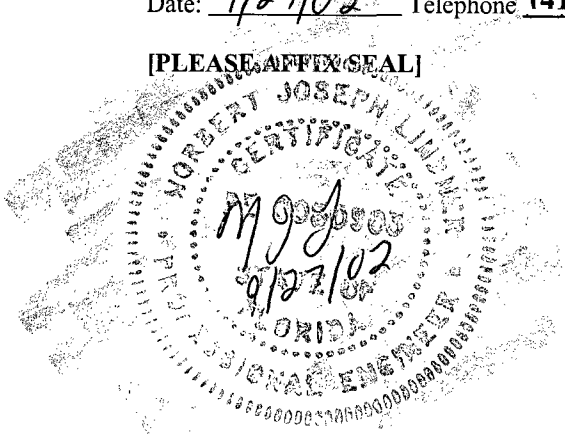
Street or P. O. Box

Moon Township, PA 15108

City State Zip

Date: 9/27/02 Telephone **(412) 809-6160**

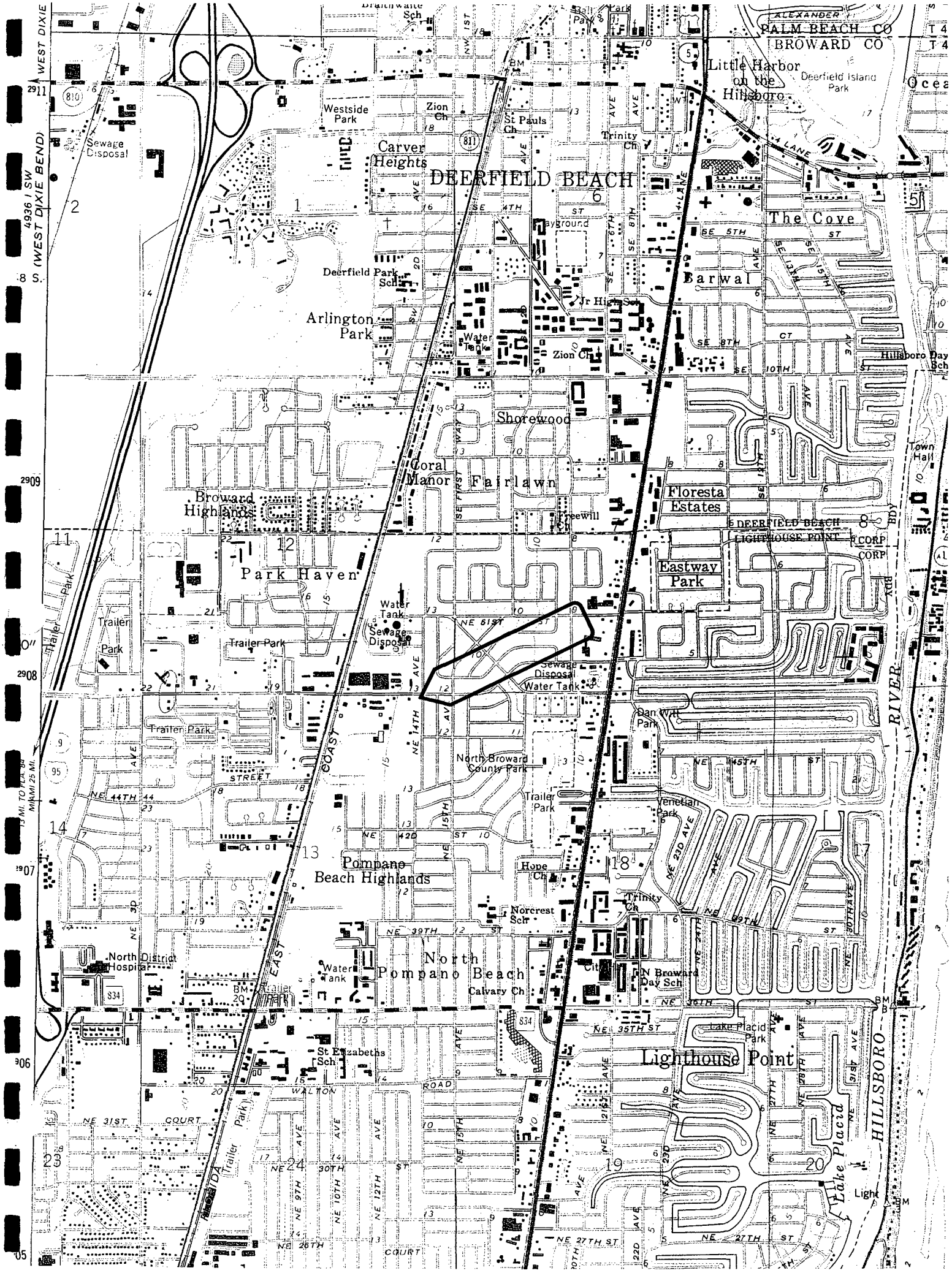
[PLEASE AFFIX SEAL]



PART 1

Section B

Attachments


PALM BEACH CO
BROWARD CO
Little Harbor on the Hillsboro
Deerfield Island Park
Westside Park
Zion Ch
St Pauls Ch
Trinity Ch
Carver Heights
DEERFIELD BEACH
The Cove
Barwal
Sewage Disposal
Deerfield Park Sch
Jr High Sch
Arlington Park
Water Tank
Zion Ch
Hillsboro Day Sch
Shorewood
Coral Manor
Fairlawn
Broward Highlands
Floresta Estates
Town Hall
Park Haven
Eastway Park
Trailer Park
Water Tank
Sewage Disposal
Dan Witt Park
North Broward County Park
Venetian Park
Pompano Beach Highlands
Hope Ch
Norcrest Sch
North District Hospital
North Pompano Beach
Calvary Ch
N Broward Day Sch
Lake Placid Park
St Elizabeths Sch
Lighthouse Point
Lake Placid
EAST COAST
HILLSBORO RIVER
WEST DIXIE
4936 I SW (WEST DIXIE BEND)
MIAMI 25 MI.
13 MI. TO FLA. 84
NE 44TH STREET
NE 39TH ST
NE 36TH ST
NE 35TH ST
NE 31ST COURT
NE 26TH COURT
NE 27TH ST
WALTON ROAD
SE 4TH ST
SE 5TH ST
SE 8TH CT
SE 10TH ST
NE 61ST ST
NE 45TH ST
NE 42ND ST
NE 30TH ST
4 LANE


GlobeXplorer™
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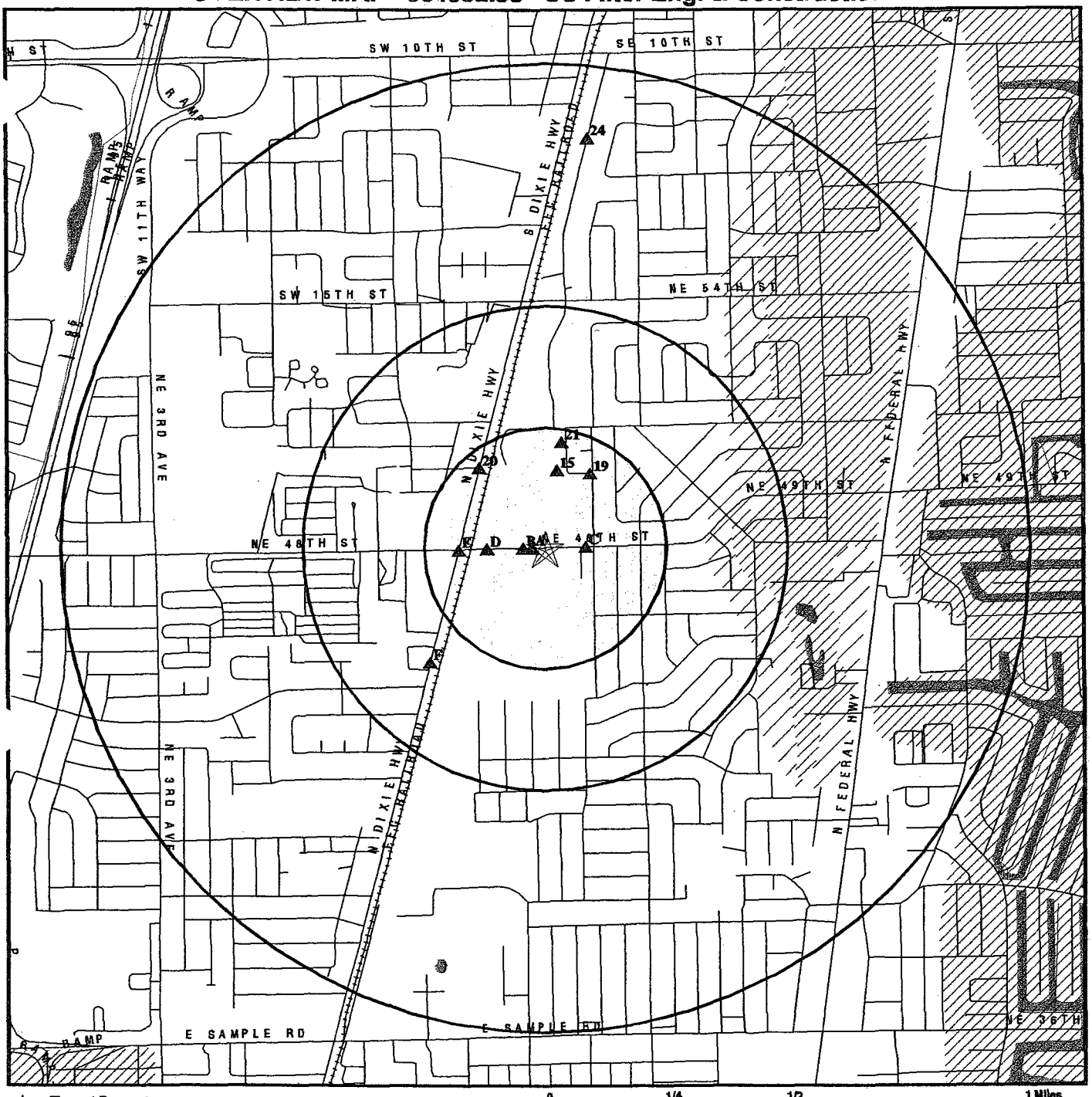
OVERVIEW MAP - 664532.3s - US Filter Eng. & Construction



- ★ Target Property
- ▲ Sites at elevations higher than or equal to the target property
- ◆ Sites at elevations lower than the target property
- ♟ Coal Gasification Sites (if requested)
- National Priority List Sites
- Landfill Sites
- Power transmission lines
- Oil & Gas pipelines
- 100-year flood zone
- 500-year flood zone
- Wetlands

TARGET PROPERTY:	Project Sunshine	CUSTOMER:	US Filter Eng. & Construction
ADDRESS:	1280 NE 48th Street	CONTACT:	Lisa Gibbons
CITY/STATE/ZIP:	Pompano Beach FL 33064	INQUIRY #:	664532.3s
LAT/LONG:	26.2900 / 80.1066	DATE:	August 06, 2001 7:27 am

PART 1

Section C

Attachments 1-9

USFILTER RECOVERY SERVICES MID-ATLANTIC, INC.
POMPANO BEACH, FLORIDA
ATTACHMENT 1
FACILITY DESCRIPTION

USFilter Recovery Services Mid-Atlantic, Inc. (USFRSMA) is a full service environmental remediation company specializing in a complete array of extraction, decontamination, transport, and treatment services. USFilter Recovery Services Mid-Atlantic Inc., an affiliate of USFilter, was incorporated in Delaware in 1997 and obtained a Florida business registration in 2002. The USFRSMA Pompano Beach facility is a registered used oil transporter, transfer facility, processor, and marketer with the Florida Department of Environmental Protection (FDEP). In addition, the Pompano Beach facility is a registered filter transporter, transfer facility and processor with FDEP.

USFRSMA manages a wide variety of wastes at this facility. The majority of the waste is petroleum related. Used oil constitutes the majority of the waste entering USFRSMA. Used oil includes used automotive oil, used industrial oil, and mixed used oil as defined by the State of Florida. USFRSMA also handles automotive, industrial, and mixed oil waters. Used oil filters are processed by compacting the filters into compressed metal cubes, drained of remaining oil and transferred to a holding tank. The metal cubes will then be transferred to a metal recycling facility. Oily waters are transported from Pompano Beach to primarily Plant City for treatment. Fuel/water/sludge mixtures are brought into the Pompano Beach facility and processed to render an off-specification fuel that is marketed for consumption in steam generation equipment.

Another major category of wastes are fuels which include combustible fuels, flammable fuels, and petroleum contact water, (PCW). The fuels are used to make the specification fuel, which is marketed.

USFRSMA also treats various wastewater streams including petroleum-contaminated groundwater, process wastewaters, and stormwater. The wastewaters are treated primarily at USFRSMA's Plant City industrial pre-treatment plant prior to discharge to the POTW.

need details on antifreeze "recycling" landfilling liquids?

Antifreeze is picked up and transported to the Pompano Beach facility where it is recycled. Other non-petroleum related and non-regulated industrial liquids and solids are also handled by USFRSMA. The industrial liquids and solids are profiled, sampled, and disposed of in a landfill.

Petroleum contaminated soils and sludges are another waste source. They are either treated in a licensed thermal facility or landfill depending on the analytical data. Debris

including personal protective equipment (PPE) is also handled by USFRSMA and is usually disposed of in a landfill.

USFRSMA is also a hazardous waste transporter and the Pompano Beach facility is an approved hazardous waste transfer facility. Hazardous wastes are stored at the facility for less than ten days and then transported to an approved hazardous waste treatment, storage, and disposal facility (TSDF).

USFRSMA is also an FDEP-approved abandoned drum (less than 10 drums) contractor.

The USFRSMA Pompano Beach facility has 28 aboveground storage tanks. All are aboveground storage tanks constructed of steel and equipped with both overfill protection and secondary containment. A table summarizing USFRSMA's aboveground tanks is provided in this attachment. Storage tank registrations under the new owner USFRSMA have been submitted and upon receipt the registration placard will be kept on file at the facility.

The USFRSMA fleet is comprised of the following vehicles: 12 pick-up trucks, 29 waste oil trucks, 10 vacuum trucks, 5 combination vacuum/box trucks, 15 tractors, 13 box trucks, 3 emergency vehicles, 11 roll-off boxes, 2 dump trailers, 5 box trailers, 23 oil tank trailers, 2 roll-off trailers, 5 vacuum trailers, 2 backhoes, 1 loader, and 9 trailers.

The following vehicles are usually parked at the Pompano Beach facility: 7 pick-up trucks, 2 dump trailers, 2 box truck, 3 tractors, 5 vacuum truck, 4 waste oil trucks, 3 box trailers, 1 loader, 1 backhoes, 2 vacuum trailers, 3 trailers and 6 roll-off boxes.

USFilter Recovery Services Mid-Atlantic, Inc. currently has 30 employees. The names of the Pompano Beach employees as well as their classifications are provided in tabular form and presented in Attachment 9 along with USFRSMA's training requirements.

USFILTER RECOVERY SERVICES MID-ATLANTIC, INC.
POMPANO BEACH, FLORIDA
ATTACHMENT 2
PROCESS DESCRIPTION

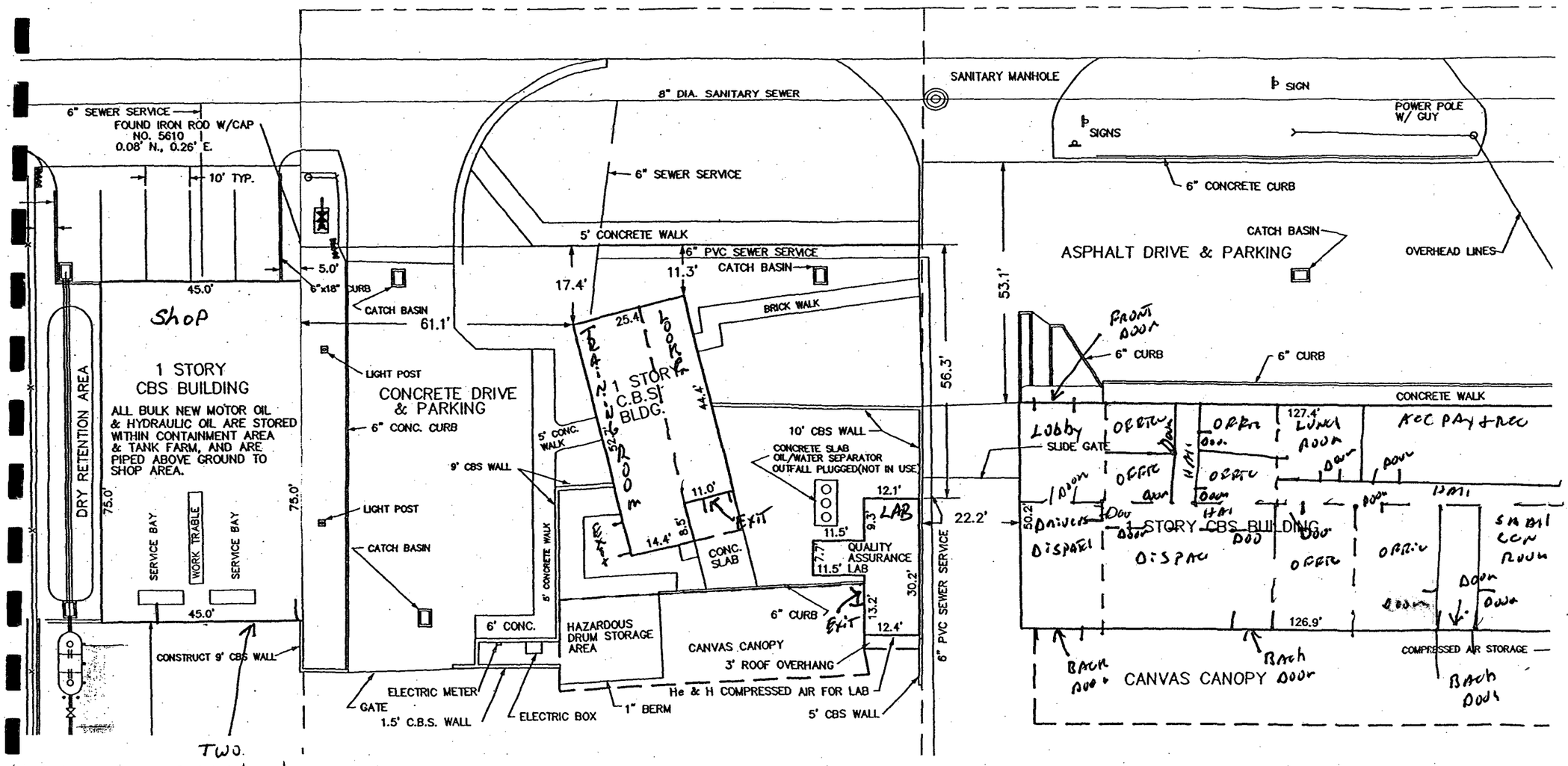
All petroleum fuels and oils are first checked in the field using halogen-screening equipment prior to acceptance into the Pompano Beach facility. Upon arrival to USFRSMA and prior to offloading, materials are checked for percent water, flash, and halogen content. Upon delivery to Pompano Beach, incoming materials are isolated in day tanks and analyzed for the presence of Polychlorinated Biphenyls (PCB's). Only when analytical results have been received showing that the material contains no PCB's will the material be further processed. Upon approval, fuel mixtures are filtered and then treated with chemicals and heat to remove excess water and to break emulsions. Fuel and sludge removed are off-loaded directly into the fuel blending area or into the sludge processing area. The lighter fuel is transferred into separate storage tanks for subsequent blending with other materials to meet the range specifications for "off-specification" fuel. The processed oil is stored and tested for on-specification parameters. After receipt of the analytical data from a certified laboratory, the specification fuel is marketed to various customers.

A piping schematic is presented at the end of this attachment.

A detailed site map, drawn to scale, is attached.

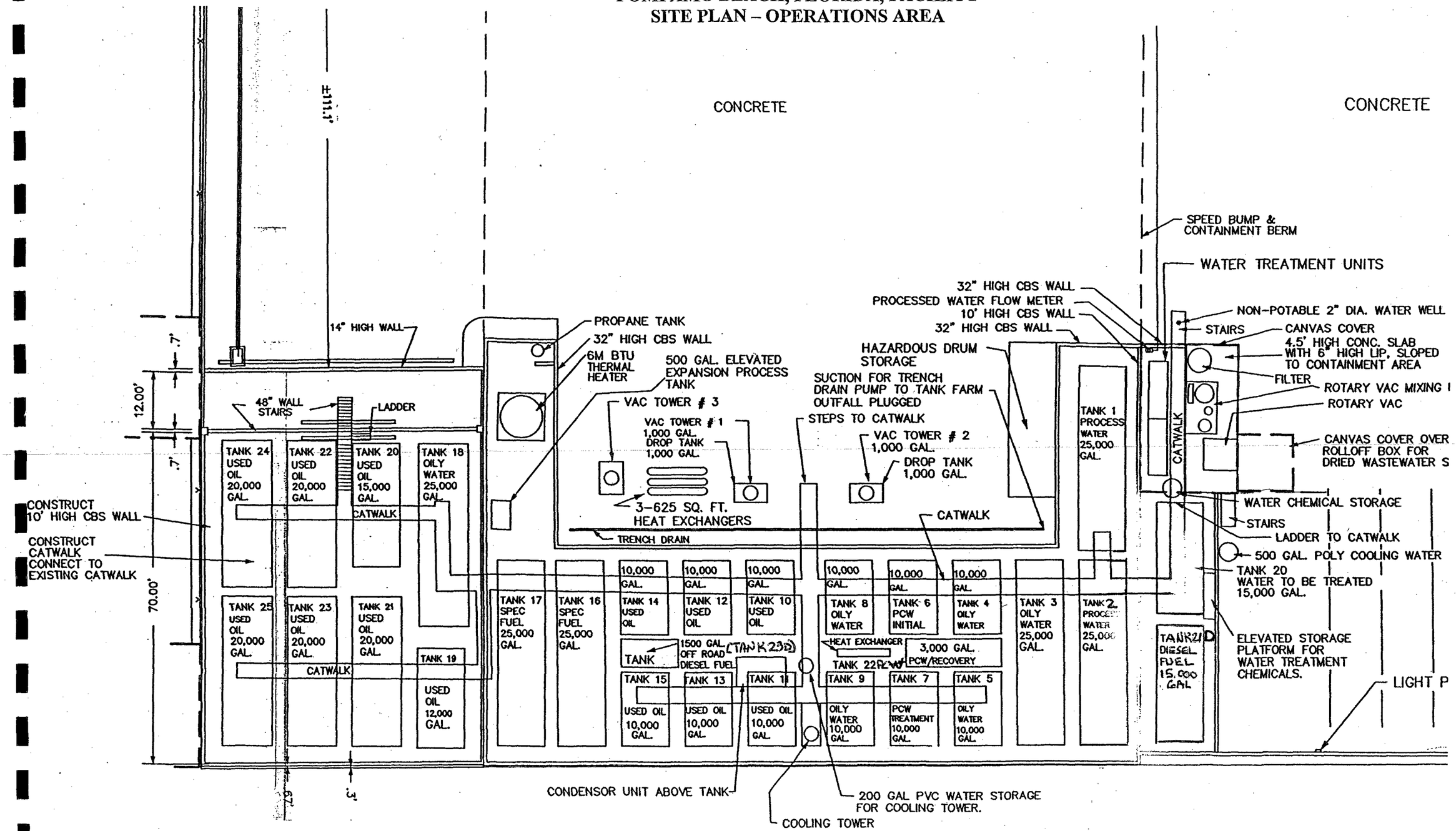
USFLITER RECOVERY SERVICES MID-ATLANTIC
POMPAMO BEACH, FLORIDA, FACILITY

SITE PLAN – ADMINISTRATIVE AREA



NOTE: SCALE AS NOTED ON DRAWING

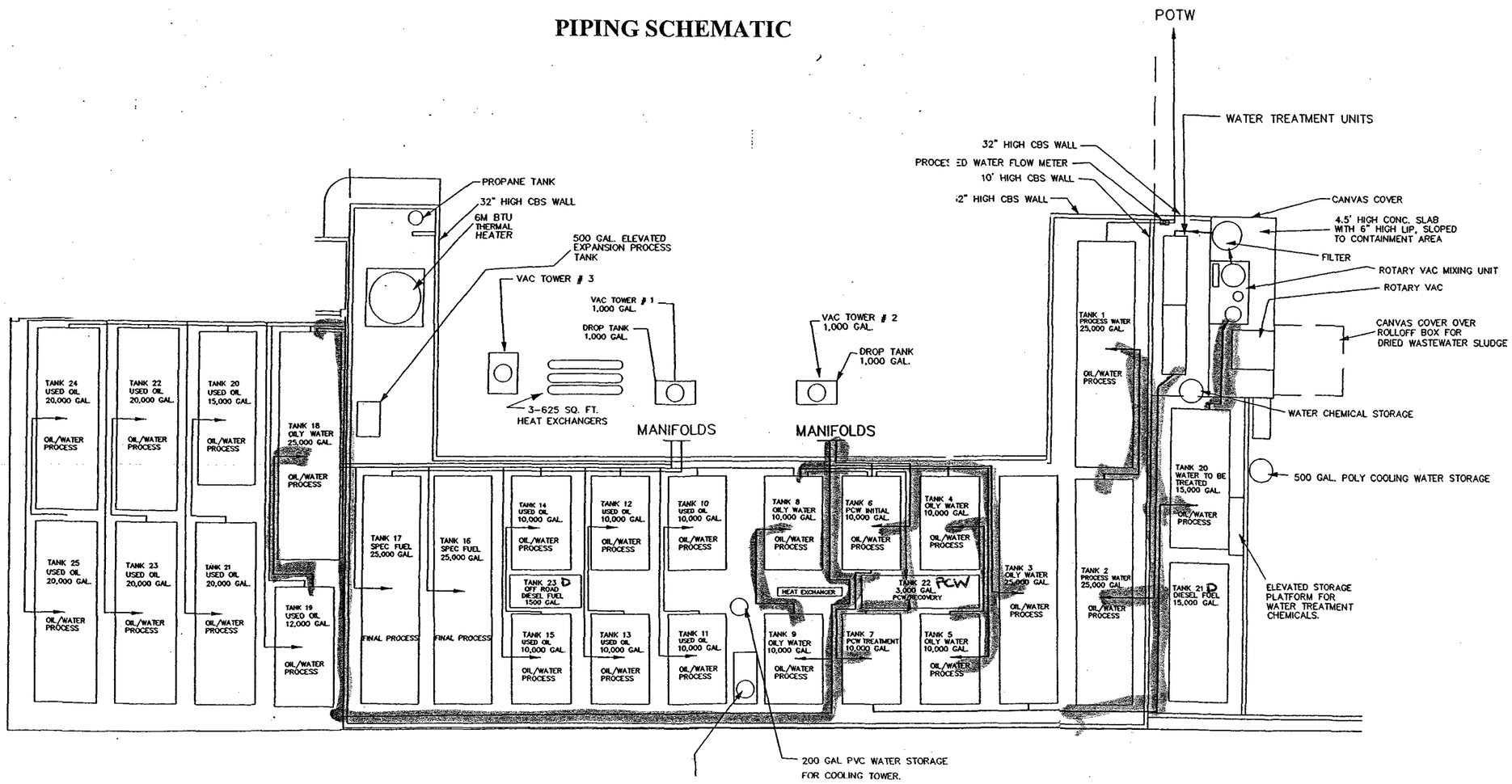
USFLITER RECOVERY SERVICES MID-ATLANTIC
POMPAMO BEACH, FLORIDA, FACILITY
SITE PLAN – OPERATIONS AREA



NOTE: SCALE AS NOTED ON DRAWING

USFLITER RECOVERY SERVICES MID-ATLANTIC
POMPAMO BEACH, FLORIDA, FACILITY

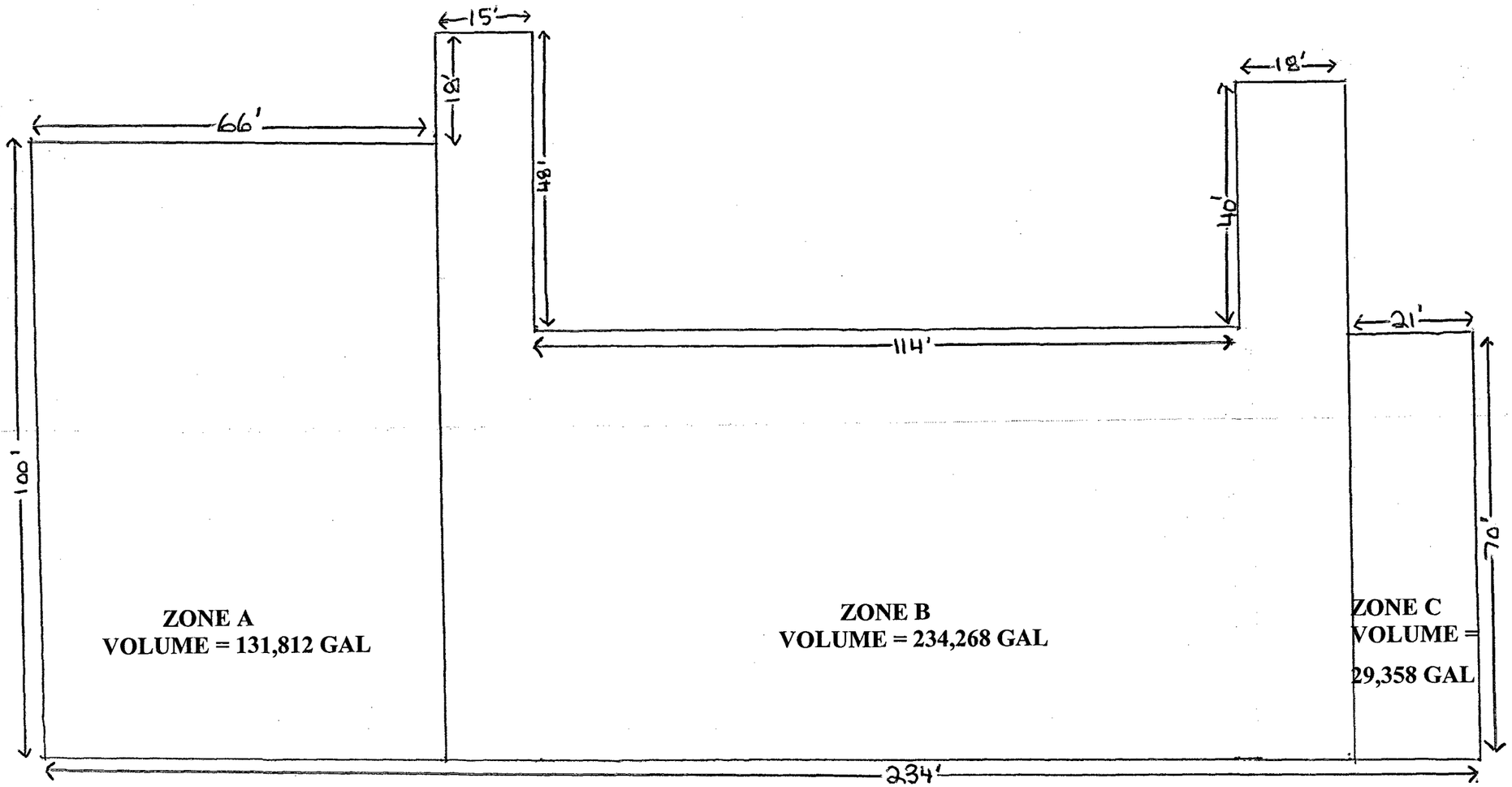
PIPING SCHEMATIC



NOTE: WATER SIDE PIPING IS SHADED
REMAINDER IS FOR OIL AND SPECIFICATION FUEL

USFLITER RECOVERY SERVICES MID-ATLANTIC
POMPAMO BEACH, FLORIDA, FACILITY

SITE PLAN – TANK CONTAINMENT AREA DETAILS



CONTAINMENT WALLS ARE 32 INCHES HIGH
TOTAL CONTAINMENT VOLUME = 395, 438 GALLONS

NOTE: SCALE AS NOTED ON DRAWING
APPROXIMATE SCALE 1 IN = 20 FEET

USFILTER RECOVERY SERVICES MID-ATLANTIC, INC.
POMPANO BEACH, FLORIDA
ATTACHMENT 3
WASTE ANALYSIS PLAN

USED OIL OPERATING PROCEDURES AND WASTE ANALYSIS PLAN PER 40 CFR 279

USFilter Recovery Services Mid-Atlantic, Inc. (USFRSMA) accepts used oil and non-hazardous oily wastes as defined under 40 CFR 279 and FAC 62.710.200. This plan addresses the following non-hazardous materials recycled, reclaimed, and/or managed by USFRSMA, including:

- Industrial and non-industrial used oil and oily-water mixtures
- Waste oil and waste oil-water mixtures managed as used oil
- Non-industrial used oil filters (UOFs)
- Absorbents and industrial filters
- Other petroleum contaminated debris as defined under FAC 62.710.200
- Used antifreeze

USED OIL AND OILY-WASTES

All used oil, oily-wastes and oily water must:

1. Correspond with the definition of used oil; "any oil that has been refined from crude oil or any synthetic oil that has been used and as a result of such use is contaminated by physical and chemical impurities."
2. Not have been mixed with hazardous waste as defined in 40 CFR 261 Subpart D.

FAC 62.710.200 defines oily wastes as those materials that are mixed with used oil and have been separated from that used oil. Oily wastes include wastewaters, centrifuge solids, filter residues or sludge, bottom sediments, tank bottoms, and sorbents which have come in contact with, and have been contaminated by, used oil and may be appropriately tested and discarded in a manner which is in compliance with other state and local requirements.

WASTE CHARACTERIZATION

Generators must provide USFRSMA with a complete characterization including analytical analysis or certification of generator process knowledge of the waste prior to acceptance. While analytical data provides the most definitive information regarding the concentration levels of hazardous constituents and other characteristics of the waste, we may accept a waste stream at our facility based, in whole or in part, on detailed waste specific information that we obtain from the generator of that waste. When a generator wishes to use process knowledge in characterizing it's waste USFRSMA requires the generator to state its claim in writing prior to accepting that waste.

PICKUP/PUMP OUT

The driver/operator of a USFRSMA vehicle used in the transport of a used oil or oily-waters must at each pickup/pump out:

1. Verify that the material being removed conforms to the physical properties of used oil or contain an oily sheen.
2. Identify the used oil category as industrial, automotive, or mixed as described by State of Florida Regulations.
3. Screen the material with a halogen meter and/or Dexsil Q1000 (or other equivalent testing) to determine if the used oil contains chlorinated compounds. Any stream that fails the halogen meter screen will be tested with a Dexsil Q1000 (or equivalent).
    a. Results of the halogen screen will be recorded on the shipping document along with the required generator information.
    b. Any stream that fails both the halogen meter screen and Dexsil Q1000 (or equivalent), will not be picked up until a retain sample can be tested for TOX (Total Organic Halide) and/or GC (as applicable) at one of USFRSMA's labs or when the generator supplies certified laboratory results and/or process knowledge sufficient to rebut the hazardous waste presumption as outlined in 40 CFR 279.

FACILITY OFFLOADING

The following will be conducted on each shipment of used oil and oily waters received at USFRSMA:

1. Sample at the terminal using a tank thief prior to unloading. The sample will be checked to verify that the material conforms to the physical properties of used oil as defined under 40 CFR 279 and FAC 62.710.200

2. The sample will be screened for chlorinated compounds content using a Dexsil Q4000 (or other equivalent testing kit) and %water by distillation.

   a. Any stream that fails the Dexsil Q4000 (or equivalent) will be segregated until sufficient information is obtained necessary to rebut the hazardous waste presumption as outlined in 40 CFR 279.44.

   b. If a load cannot successfully be rebutted, the material will be rejected as non-conforming and will be managed by doing one of the following:

      1) Returned to the generator

      2) Laboratory analysis will be conducted to identify hazardous constituents and other characteristics that may classify the material as a hazardous waste. The load will be profiled to the proper disposal facility and upon acceptance will be transported to the designated TSDF in accordance with 40 CFR Subtitle C.

ABSORBENTS, FILTERS & OILY WASTES

The driver/operator of a USFRSMA vehicle used in the transport of industrial and non-industrial absorbent, filter streams and other incoming oil-contaminated solids must at each pickup/pump out:

1. Verify that the material contains visible free flowing oil.

Note: Used oil recovered from drum loads will be screened for halogens prior to unloading into USFRSMA processing facilities.

Because storage patterns and the use of high powered vacuum equipment do not always lend recognition of oily wastes contained or confined by used oil, any such materials will be treated as part of the used oil shipment and segregation shall take place at the facility as part of the process. These wastes include:

1. Heel from offloading, primary phase separation at the tower and residue from truck decontamination procedures.
2. Tank bottom sludge from tank cleaning performed on the process tanks as part of facility maintenance.

The two categories of materials are stored and tested separately.

USED ANTI-FREEZE

The driver/operator of a USFRSMA vehicle used in the transport of antifreeze must at each pickup/pump out:

1. Verify that the material conforms to the physical description provided by the generator's waste characterization.
   a. Any significant difference between the samples physical characteristics and those presented during the pre-approval process will not be picked up until a sample can be tested and the material profiled and handled accordingly.

MATERIAL STORAGE

All materials are stored in aboveground tanks registered with the FDEP, where required by FAC 62-762, or DOT-approved shipping containers. The tanks are labeled USED OIL and have the appropriate NFPA labels affixed. Drums are labeled with non-hazardous shipping labels that contain generator information, date, and material description.

ON-SPECIFICATION CLAIM

Used oil fuels are processed at USFRSMA's facility using chemical and physical means to obtain an on-specification used oil fuel. Sampling and analysis performed by a USFRS lab or state certified laboratory is used to verify the on-specification claim. The used oil fuel is produced in batches. The physical properties of the material are monitored in-house using an on-site laboratory. However, once a load is accumulated in a 25,000-gallon storage tank, a representative sample is obtained using a tank thief, and the sample is sent for analysis. The following table defines the parameters and methods used for testing:

need to verify

Parameter	Method
Total Halogens, ppm	SW 9076
Organic Halogens, ppm	UO-588
Inorganic Halogens, ppm	UOP-588
Gravity API @ 60 degrees F	D-287
Heat of combustion, BTU/gallon	D-240
Viscosity SUS @ 100 degrees F	D-445
Flashpoint, degrees F	SW 1010
Ash, wt. %	D-482
PCBs, ppm	SW 8080
Sulfur, wt. %	D-4294
Total Arsenic, ppm	SW 3050/7061
Total Cadmium, ppm	SW 3050/7130
Total Chromium, ppm	SW 3050/7190
Total Lead, ppm	SW 3050/7420

USFILTER RECOVERY SERVICES MID-ATLANTIC, INC.
POMPANO BEACH, FLORIDA
ATTACHMENT 4
SLUDGE, RESIDUE, AND BYPRODUCT MANAGEMENT DESCRIPTION

Solid material or residue that accumulates over time in the bottom of the separation vessel, pump trucks or tankers is removed and analyzed for TCLP constituents. Solids that are within the TCLP limits are stabilized with kiln dust in a roll-off box and sent for disposal at a secured landfill. Solids that exceed the criteria for classification as a characteristic waste are containerized and disposed of at the off-site licensed Treatment, Storage and Disposal facility (TSDF) operated by Onyx Environmental Services in Morrow, Georgia. Each material sent to the TSDF facility is accompanied by a hazardous waste manifest. A tank farm sludge management plan is currently being developed however, the plan will include provisions for removal of residue from used oil tanks and final specification oil tanks every nine to twelve months. Testing shall include, at a minimum, TCLP 8 RCRA Metals, TCLP Volatiles, TRPH, Flashpoint, and TOX. Other test parameters may be performed when deemed appropriate.

USFILTER RECOVERY SERVICES MID-ATLANTIC, INC.
POMPANO BEACH, FLORIDA
ATTACHMENT 5
TRACKING PLAN

USFRSMA Environmental Services maintains records of all materials transported from and received at the USFRSMA facility for a minimum of three years. Tracking of incoming used oil material (used oil and oily water) is done by completion of both daily control log and weekly metric spreadsheets. Each driver must submit a daily control log to accompany the daily work orders and manifests. Work orders and manifests will be kept on-site in a customer file at the facility. The daily control log information is then entered into USFilter's electronic weekly performance metrics report system. This report is an electronic spreadsheet that determines the total weekly amounts of material received at the facility. Copies of the reports generated on a weekly basis will be retained at the facility for a least three years. Copies of both the daily control log and the weekly performance metric report are included as part of this section. Tank inventory records are filed daily and an additional copy is sent for filing to the USFRSMA facility in Plant City. These records are also retained for a three-year timeframe.

operation log?

ENDING MILES							
STARTING MILES							
TOTAL MILES							

USFilter Recovery & Services

DRIVERS DAILY LOG

Corporate Office: *105 South Alexander St.*
Plant City, Florida 33566
Phone: (813) 754-1304
Fax: (813) 754-3789

FUEL - GAL	
TRUCK #	
DATE	

*ONE- HALF HOUR LUNCH IS MANDATORY UNLESS OTHERWISE INSTRUCTED.

REP. NAME JOHN LUCARELLI

	CUSTOMER NAME & ADDRESS	MANIFEST NUMBER	OIL FILTERS	WASTE OIL	WATER	CONTAM. SOIL	FUEL	ANTI FREEZE	SLUDGE	MISC.	TIME IN	TIME OUT	NEXT PICKUP	PAYMENT Charge	Check	Cash
1																
2																
3																
4																
5																
6																
7																
8																
9																
10																
COMMENTS		TOTALS														

US FILTER HYDROCARBON GROUP

Weekly Performance Metrics

Location: Pompano Beach

Week Ending: _____

	Friday	Saturday	Sunday	Monday	Tuesday	Wednesday	Thursday	Total
Wastewater/Oily Water (gals) received[1]		-	-	-		-		
UST/PST (gals) received	-	-	-				-	
EG Gallons Shipped, from Rockville	N/A	N/A	N/A	N/A	N/A	N/A	N/A	
SureTemp Gallons Loaded, from Rockville	N/A	N/A	N/A	N/A	N/A	N/A	N/A	
Finished Oil Shipped (gal)		-	-		-			
Transportation Hours Billable	-	-	-			-	-	
Used Oil Filters Collected (drum equiv.)		-	-					
Agreement Fees Paid for	N/A	N/A	N/A	N/A	N/A	N/A	N/A	
Route truck oil collected (net gals.)		-	-					
Used antifreeze collected (gals)		-	-				-	

Note - [1] wastewater received is that material which is invoicable, and not internal transfers

Remarks: _____

USFILTER RECOVERY SERVICES MID-ATLANTIC, INC.
POMPANO BEACH, FLORIDA
ATTACHMENT 6
PREPAREDNESS AND PREVENTION CONTINGENCY PLAN

The purpose of the contingency plan is to minimize hazards to human health or the environment from fires, explosions or any unplanned sudden or non-sudden releases of hazardous wastes or hazardous material and constituents to the air, soil or surface waters.

This plan is designed to comply with **40 CFR 265-52** and incorporates a Spill Prevention, Control and Countermeasures Plan as required by **Florida Statute 403-74** per **40 CFP Part 112.**

The Plan must be implemented immediately whenever there is a fire, explosion or unplanned release of hazardous material that could threaten human health or the environment. The original is located in the main office. Copies are located in the general manager's office and in the lab. Copies will be distributed to the following agencies after approval from the FDEP:

1. FIRE DEPARTMENT
2. POLICE DEPARTMENT
3. HOSPITAL

EMERGENCY PROCEDURES & ACTIONS

In the event of an emergency situation the emergency coordinator must be notified immediately. If the emergency coordinator cannot be contacted, secondary contacts are provided, see Appendix A of this attachment.

The emergency coordinator will act according to the following procedures:

1. Determine the nature of the emergency; fire, explosion potential, or spill. Identify the source.
2. Utilize the telephone paging/p.a. system to notify all personnel that an emergency situation exists and to issue any special instructions by **dialing *9**.
3. Determine whether help is required from any of the outside agencies listed in Appendix B of this document. Call and inform agencies of the situation and solicit their help if necessary.

   In the event that emergency agencies are called to assist, the gated entrances to the facility are locked in the open position so as not to impede the response team. The gates must be open prior to any power shutdown, however in the

event that power fails, the gates can be opened manually using a hand crank. The facility manager has primary responsibility for power shutdown of the tank farm and gate control. It is the emergency coordinator's responsibility to ensure that the above tasks are completed.

If the emergency is within the company's scope of service to respond – in-house personnel will be directed for cleanup. If the emergency is beyond the facility's capability, spill containment procedures will be implemented and the proper authorities notified for response.

4. Determine the nature and quantity of materials involved by:
   - physical observation/label identification
   - inventory records
   - chemical analysis and/or material profiles
5. Decide what should be done immediately to keep the situation from worsening:

   A. Explosion Hazard

   Determine whether any reactive substances in the area need to be relocated. If explosion has occurred which does not result in a fire, remove any hazardous obstacles that can be safely retrieved.

   B. Spill

   If a spill has occurred; determine the source, contain it by using the emergency equipment and absorbent material and initiating any product transfers that may be deemed necessary to minimize the spill.

   Obtain the following information:

   a) the material released

   b) location of the material

   c) quantity of material released

   d) any injury from the release

   C. Fire Hazard

   If fire has occurred, use the fire extinguishers to control the fire, if possible. Do not attempt to control a blaze that appears to be out of control; rely on the proper authority response. Ensure that all storage areas are accessible to fire fighters. If a fire should break out, concentration will be placed on preventing the fire from spreading. The emergency coordinator will monitor for leaks and pressure build-up while awaiting the proper fire-fighting agency.

6. Before the facility may be brought back into production following an emergency event, the emergency coordinator must:

   A.) Have the facility declared safe for re-entry by any outside organizations responding.

   B.) All involved materials must be accounted for and properly stored.

   C.) Emergency equipment has been cleaned and is ready for use

---

NOTE: In the event of an emergency all personnel will discontinue any telephone conversations. Personnel escorting visitors must accompany the visitor to the nearest safe exit. All workstations will be shutdown.

PREPAREDNESS AND ARRANGEMENTS WITH LOCAL AUTHORITIES

EMERGENCY EQUIPMENT: An equipment list is included as Appendix D of this attachment. Equipment is cleaned and checked after each use. Equipment that operates on independent power is properly charged prior to storage. Fire extinguishers are checked and tagged in accordance with fire safety practices. Fire extinguisheres, eyewash stations, showers and spill kits are strategically located throughout the facility. Locations have been determined by area usage and the potential for harm.

FIRE RESPONSE: Personnel from the responding station toured USFRSMA's facility as recently as July 1996 and are acquainted with the facility operations and layout. The fire station has key and code access to USFRSMA's facility. Inventory records are kept in a designated box located outside the gate in the event of an emergency after hours.

POLICE RESPONSE: Uniformed personnel have been acquainted with the facility layout and are familiar with operations. Police personnel would assume charge of any traffic control issues that should arise in the event of an emergency.

HOSPITALS: Telephone conversations have been conducted with hospital representatives confirming the purpose of the contingency plan and the potential hazards associated with USFRSMA's processes. Copies of material safety data sheets for chemicals used in USFRSMA's processes are included in the hospital copy of the contingency plan.

See Appendix B for Emergency Response Contacts

EMERGENCY PRECAUTIONS

1.) KEEP CALM, THINK, AVOID PANIC AND CONFUSION.

2.) KNOW ALL EXIT LOCATIONS: BE SURE YOU KNOW THE SAFEST AND QUICKEST WAY OUT OF THE BUILDING.

3.) DO NOT LOCK DOORS WHEN VACATING THE FACILITY, THE EMERGENCY COORDINATOR AND EMERGENCY SUPPORT PERSONNEL MUST HAVE ACCESS TO ALL PARTS OF THE FACILITY.

4.) DO NOT USE VOICE PAGING SYSTEM. THE LINES MUST REMAIN CLEAR FOR THE EMERGENCY COORDINATOR

5.) WHEN EVACUATING THE FACILITY, WALK TO THE NEAREST SAFE EXIT. REPORT TO SAFE AREAS AWAY FROM THE BUILGING AND WAIT.

6.) DO NOT RE-ENTER THE FACILITY UNLESS INSTRUCTED TO DO SO.

7.) KEEP OUT OF THE WAY OF EMERGENCY RESPONSE PERSONNEL.

EVACUATION PROCEDURES

A. PURPOSE:

1. Plan for safe evacuation in the event of an emergency.

B. RESPONSIBILITIES:

1. The emergency coordinator is responsible for implementing the evacuation procedure.
2. Each employee is responsible for escorting any visitors from his/her work area to the proper exit.

C. PROCEDURES:

1. The emergency coordinator will notify management in the even an evacuation becomes necessary.
2. The emergency coordinator will order the evacuation and any other actions required.
3. When an evacuation is announced, **stop work**. Exit your work area in accordance with the evacuation routes.
4. All employees must leave the facility unless instructed otherwise by the emergency coordinator. Do not run. Do not linger in the hallways or doorways.

5. Each employee must report to his/her manager once outside the facility.
6. Each manager must report to the emergency coordinator. All personnel must be accounted for.
7. The emergency coordinator will notify the managers when it is safe to re-enter the facility.
8. Stay outside the facility until notified by the manager it is safe to re-enter.

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*Evacuation Routes: Floor diagrams in APPENDIX C show each section of the facility and the best routes for evacuation. Fire extinguishers are also shown in the appendix.

RECORD KEEPING AND REPORTING

1. The emergency coordinator must keep a record of any and all emergency events. Verbal reports are to be presented within 24 hours of each incident with written reports submitted within seven days. Reports are to be filed with the following agencies:

   A) **FLORIDA DEPARTMENT OF ENVIRONMENTAL PROTECTION**

   Physical Address:

   400 N. Congress Ave. Phone: (561) 681-6600 ← business hrs only

   Southeast District Office ↙ 6770

   West Palm Beach, FL 33401 Fax: (561) 681-6755

   Mailing Address:

   P.O. Box 15424

   West Palm Beach, FL 33416-5425

   B) **Local Agencies**

   Broward County Department of

   Planning and Environmental Protection Phone: (954) 519-1270

   Broward County Department of

   Compliance and Monitoring Section Phone: (954) 831-3076

   C) **State Agencies**

FDEP – Tallahassee	Phone: (850) 488-0300
National Response Center	Phone: (800) 424-8802
State Warning Point	Phone: (850) 413-9911
(Emergency Management State of Florida)	
EPA Emergency Response	Phone: (404) 562-8700

2. The report must include the following information:

24 hr.
800 320-0519

a) Name, address, and telephone number of the emergency coordinator.

b) Name, address, and telephone number of the facility.

c) Date, time, and type of incident.

d) Name, type and quantity of materials involved.

e) Any injuries that may have occurred.

f) An assessment of the actual or potential harm to human health and the environment.

g) Estimated quantity and disposition of any materials recovered.

The contingency plan will be maintained at the facility and submitted to local emergency response authorities, which are identified in this plan. Copies of return receipts will serve to verify receipt of the plan with the local response authorities. The plan will be amended when necessary i.e. regulations change, plan fails upon use, the facility owner, process, or contingency plan is modified, etc.

APPENDIX A

EMERGENCY COORDINATOR

PRIMARY:	**Dennis Williams**	**954-785-2320**	**Site**
	1280 NE 48th Street	**954-214-3703**	**Mobil**
	Pompano Beach, FL	**954-344-8790**	**Home**

ALTERNATE:	**Catherine Porthouse** **2167 SW Danford Circle** **Palm City, FL 34990**	**561-216-9265**	**Mobil** **Home**

APPENDIX B

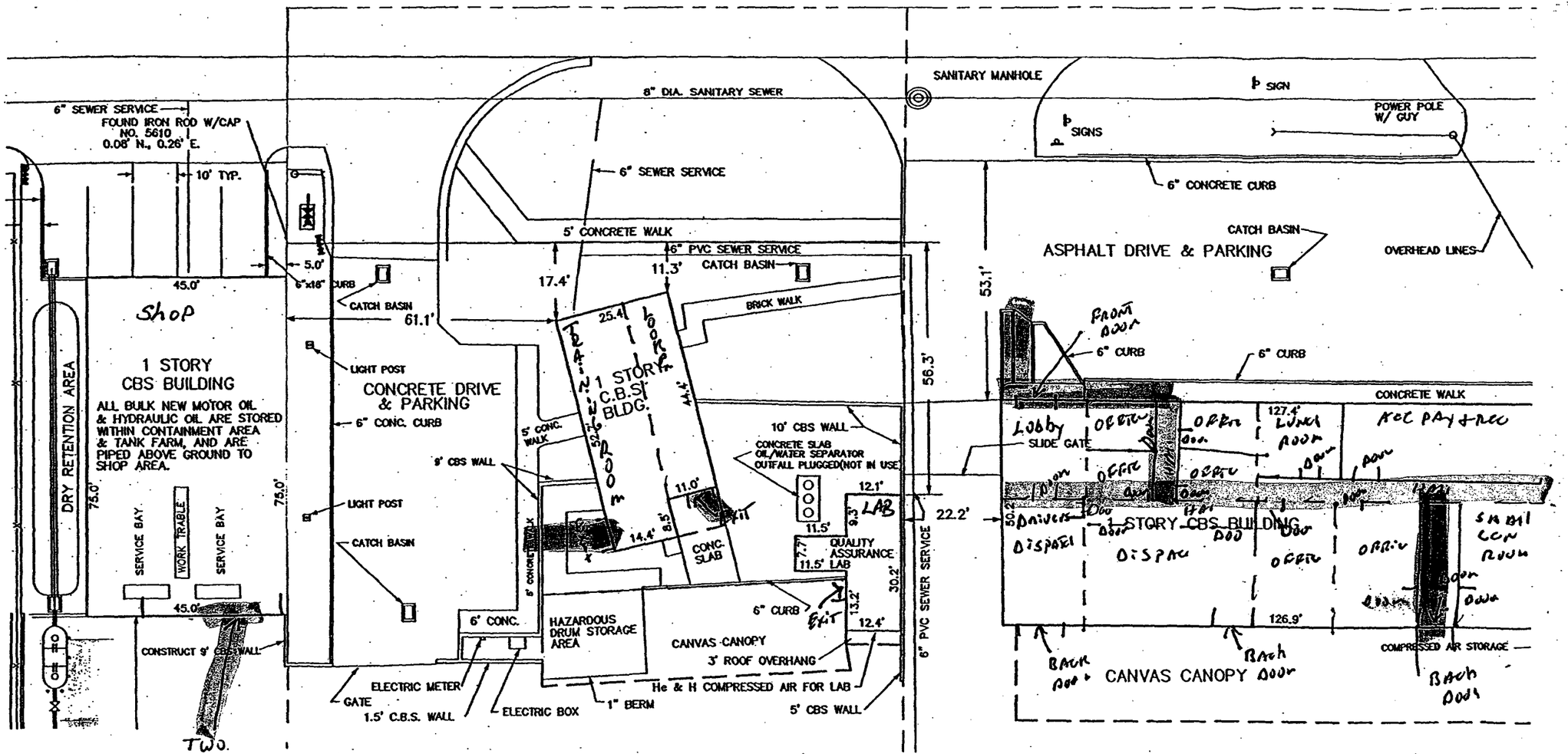
EMERGENCY		
FIRE	DISPATCH OFFICE Responding Station 2800 Rhode Island Ft. Pierce, FL 34982 **Responds to fires and hazardous material spills: personnel are cross trained EMS*	 911 561-462-2312 - business office
INJURY	LIFE THREATENING *In the event of trauma, EMS personnel will make all decisions regarding care handler facilities.	911
	HOSPITAL & 24 HOUR EMERGENCY SERVICES: Columbia-Lawnwood Regional Medical Center 1700 South 23rd Street Ft. Pierce, FL 34950	 561-461-4000
	NON LIFE THREATENING Minor Emergicenter 750 S. Federal Highway Deerfield Beach, FL 33441 Contact: Joy Egan	561-461-4000 954-426-2967
SPILL		
	DEP/West Palm Beach	561-433-2650
	Chem Trec	800-434-9300

← no

APPENDIX C

USFLITER RECOVERY SERVICES MID-ATLANTIC
POMPAMO BEACH, FLORIDA, FACILITY

Evacuation Plan



NOTE: SCALE AS NOTED ON DRAWING

APPENDIX D

USFILTER RECOVERY SERVICES MID-ATLANTIC, INC.

Equipment List

DESCRIPTION

DESCRIPTION	QUANTITY	DESCRIPTION	QUANTITY
Absorbant (loose-25 lb)	25 bags	Box Trucks (22 ft)	2
Visqueen	30 rolls	Box Trailers	2
Oil Dry	10 bags	Roll Offs (20 yds)	2
Absorbant Pads (200 count)	50 bales	Roll Offs (30 yds)	1
Rags	50 lbs	Pump Trucks (2200-3500)	5
Cellular Phones	16	Vac. Trucks (2100 gals)	1
Radios (vehicle mounted)	27	Vac. Trucks (3000 gals)	1
Tyvex Suits	80 cases	Vac. Trucks (3500 gals)	3
Base Radio Stations	2	Vac. Trailers (6000 gals)	3
Protective Goggles	25 Sets	Vac. Trailers (6500 gals)	1
17-H DOT drums (55 gals)	200	Dump Trailers (40 yds)	3
DOT Overpack Drums (Steel)	50	Tank Trailers (7000 gals)	6
Flashing Barricades	6	Flat Bed Trailer (45 ft)	1
Barricade Tape	10 rolls	Tractors	8
Protective Gloves	10 cases	Low Boy Trailer	1
Protective Boots	30 pairs	Fully Equipped Response Van	1
Portable Air Blower	2	Fully Equipped Response Trailers	2
Portable Generator	3	Loader/Backhoe (case 580)	1
Absorbant Boom (50 ft bag)	50	Rubber Tire Loader (cat 930)	1
Hard Hats	30	Pickup Trucks (1/2 ton)	7
Vests	30	Utility Trucks	2
Portable Fire Extinguishers	20	Shovels (round head)	10
Inner Harbor Containment Boom (18 inch)	2500 ft	Lighted Buoys	20
Anchors (22 lbs)	20	Nylon Line (1/2 inch)	1000
Portable Lights	4 bars	Portable Pump (2 inch)	2
Portable Pump (3 inch)	2	Level A Suits	6
Level B Suits	10	Breathing Apparatus (self contained)	8 sets
Shovels (flat head)	10	Saranex Suits	7 cases
DOT Overpack (Poly)	50		

USFILTER RECOVERY SERVICES MID-ATLANTIC, INC.
POMPANO BEACH, FLORIDA
ATTACHMENT 7
UNIT MANAGEMENT PLAN

If a container holding waste is not in good condition (e.g. severe rusting, apparent structural defects) or if it begins to leak, USFRSMA personnel will transfer the waste from this container to a container that is in good condition. At least weekly, USFRSMA personnel inspect areas where containers are stored, looking for leaking containers, and for deterioration of containers. USFRSMA maintains aisle space to allow the unobstructed movement of personnel, fire protection equipment, spill control equipment, and decontamination equipment to any area of the facility operation in an emergency. Hazardous waste containers are placed in accordance with the 50-ft. setback rule and with adequate aisle space.

All of USFRSMA's aboveground storage tanks are located within a containment area. The containment system is free of cracks or gaps and is sufficiently impervious to contain leaks, spills, and accumulated precipitation until the material is removed. The containment system has sufficient capacity greater than 110% of the volume of the largest container. The containment system capacity is approximately 395,438 gallons and the calculations are presented as part of this attachment. The precipitation, which enters the tank storage area and the secondary containment area, is pumped into the onsite water storage tanks for treatment. A description of the drainage facilities at the Pompano Beach facility is presented as part of this attachment.

line/seal?

All aboveground used oil process and storage tanks are properly labeled with the words "Used Oil." All tanks at USFRSMA are steel aboveground storage tanks equipped with overfill protection. All oil piping is aboveground so there is no contact with the soil. A table listing the storage tank volumes, material stored, and installation dates is included in this attachment. Photographs documenting the hazard diamonds and the labeling were presented previously.

Any new aboveground storage tanks constructed of steel will meet or exceed the requirements found in UL No. 142, API Standard No. 620, API Standards No. 650, API Standard No. 12B, API Standard No. 12D, or API Standard No. 12F.

USFRSMA inspects the aboveground tanks and piping for leaks as part of a release detection-monitoring program. At least once a month, USFRSMA personnel inspect the exterior of each tank and the secondary containment area for wetting, discoloration, blistering, corrosion, cracks, or other sign of structural damage or leakage.

In the event any component of USFRSMA's storage tank system is discovered to have discharged or contributed to the discharge of a pollutant, USFRSMA personnel will isolate that component from the system, if possible, and not utilize that component until it is correctly repaired or replaced. If the storage tank system or any component of the system cannot be operated in compliance with Chapter 62-762 F.A.C., the storage tank system will not be operated until the component has been repaired or replaced. If a tank has discharged or contributed to the discharge of a pollutant, that tank will be taken out of service until the tank is repaired or replaced. All repairs to storage tanks will be made in a manner preventing any discharge from the storage tank system due to structural failure or corrosion for the remaining life of the storage tank system. All repairs to damage or defective storage tank system components shall be made to restore the structural integrity of the storage tank system. All pipe sections and fittings from which a pollutant has been discharged or which is otherwise damaged or defective will be repaired in accordance with the manufacturer's specifications or in accordance with Rule 62-762.210 F.A.C.

62-761

The secondary containment system will be repaired as necessary to maintain product tightness and containment volume of the system, including, but not limited to sealing cracks in concrete, repairing punctures, and maintaining containment walls. USFRSMA records of repairs, excluding routine maintenance, to the storage tank system.

USFILTER RECOVERY SERVICES MID-ATLANTIC, INC.
POMPANO BEACH, FLORIDA
ATTACHMENT 8
CLOSURE PLAN

USFRSMA's Pompano Beach facility is designed, constructed, and operated to minimize any threat to the environment. The closure plan will be updated whenever significant operational changes occur or design changes are made. The closure plan will be maintained with records required under Rules 62-701 and 62-710, Florida Administrative Codes (FAC).

The Closure Plan is based upon a scheduled and orderly shutdown of the facility. USFRSMA will submit an updated and detailed closure plan to the FDEP at least 60 days prior to the scheduled date of closing the facility. At this time, there is no scheduled closure date for the facility. The intent is to operate the facility for the indefinite future. Within 30 days after closing the facility, USFRSMA will submit a certification of closure completion to the FDEP, which demonstrates that the facility was closed in substantial compliance with the detailed closure plan.

CLOSURE PERFORMANCE STANDARD

Should closure become necessary, USFRSMA will comply with the requirements of 40 CFR, Part 279.54(h) and Chapter 62-710, FAC. The intent is to decommission the facility to an environmentally safe and secure state such that:

- There will be no need for further facility maintenance;
- Used oil will not contaminate surface or groundwater;
- All tanks, piping, secondary containment and ancillary equipment will be emptied, cleaned and decontaminated, and all storage materials removed and managed; and
- All aboveground storage and process tanks will be closed pursuant to Rule 62-761.800(2)(c), FAC.

The demolition of the facilities is not a part of the basic closure decommissioning process. If demolition becomes necessary to achieve the Closure Performance Standard, such demolition would be considered a contingency item. Demolition activities after achieving closure certification are a business item not within the scope of this Closure Plan.

VERIFICATION OF CLOSURE PERFORMANCE STANDARD

The Florida regulations do not contain any specific guidelines for determining whether equipment, tanks, and containment have been successfully decontaminated. Although the facility does not process hazardous wastes, in most cases, the applicable decontamination standards are those identified in 40 CFR 268, Table 1 for the decontamination of material to a clean debris surface. Table 1, Option A(1)(e) for high-pressure steam or water and Option A(2)(a) for water wash, including the use of additives to remove hazardous contaminants, are the most readily available. These performance standards do not require analytical confirmatory testing, as the objective standard is a visual inspection. QA/QC confirmatory tests using wipes or rinsates can be utilized if desired. Rinsates would be assessed for the presence of 40 CFR 261 hazardous characteristics.

CLOSURE OF TANK STORAGE

Maximum tank storage is 416,500 gallons. A list of the storage tanks present at the Pompano Beach location is presented in Table 8-1.

Table 8-1
Aboveground Storage Tank Information
Pompano Beach Facility

Tank Number	Volume (Gallons)	Material Stored in Tank	Installation Date
1	25,000	Other Non Regulated	6/1/93
2	25,000	Other Non Regulated	6/1/93
3	25,000	Used Oil	6/1/93
4	10,000	Oily Water	6/1/93
5	10,000	Oily Water	6/1/93
6	10,000	Other Non Regulated	6/1/93
7	10,000	Other Non Regulated	6/1/93
8	10,000	Oily Water	6/1/93
9	10,000	Oily Water	6/1/93
10	10,000	Used Oil	6/1/93
11	10,000	Used Oil	6/1/93
12	10,000	Used Oil	6/1/93
13	10,000	Used Oil	6/1/93
14	10,000	Used Oil	6/1/93
15	10,000	Used Oil	6/1/93
16	25,000	Spec. Oil	6/1/93
17	25,000	Spec. Oil	6/1/93
18	25,000	Used Oil	6/1/99
19	12,000	Used Oil	6/1/99
20	15,000	Used Oil	6/1/99
21	20,000	Used Oil	6/1/99
22	20,000	Used Oil	6/1/99
23	20,000	Used Oil	6/1/99
24	20,000	Used Oil	6/1/99
25	20,000	Used Oil	6/1/99
23D	1,500	Diesel	6/1/93
21D	15,000	Diesel	6/1/93
22PCW	3,000	Other Non Regulated	6/1/93
Total	416,500		

Containment Area Storage Capacity

Zone A		Zone B		ZoneC	
Length (ft.)	66	Length (ft.)	234	Length (ft.)	21
Width (ft.)	100	Width (ft.)	70-118	Width (ft.)	70
Height (ft.)	2.67	Height (ft.)	2.67	Height (ft.)	2.67
Volume (gal)	131,812	Volume (gal)	234,268	Volume (Gal)	29,358

TOTAL CONTAINMENT VOLUME 395,438

Upon closure, all tanks will be emptied. Any inventory that meet or can be processed to meet marketing specifications for used oil will be processed and marketed as such. All material will be characterized in accordance with 40 CFR 279.54(h) and Part 261. Characterization will be based on process knowledge and chemical analysis for TCLP constituents. Upon closure of the tank system in accordance with 40 CFR Part 279, USFRSMA will remove or decontaminate used oil residues in tanks, contaminated secondary containment system components, contaminated soils, structures, and equipment. USFRSMA will manage these materials as hazardous waste, unless the materials are not hazardous waste as determined by chemical analysis. The wastes will be properly contained and shipped to a permitted disposal facility.

Liquid wastes will be removed via the tank piping system and handled as an oily waste. Material that cannot be removed via the piping system will be accessed via the tank manways or hatches. Confined space entry procedures will be followed. Residual liquid and sludge material at the bottom of each tank will be removed via pumping and handled as an oily sludge. Solid material at the bottom of the tank that cannot be removed as sludge will be removed and handled as an oily solid.

After the tanks are emptied, they will be first saturated with steam for up to 24 hours to loosen any hardened material. The steam condensate and generated solids will be handled as an oily sludge. Manual scraping will be performed to remove any further hardened material. The tanks will then be pressure washed until the visual inspection performance standard is achieved. Final rinsate samples will be collected as QA/QC confirmation of decontamination status.

As a contingent measure, if the tanks cannot be successfully decontaminated in place, the tanks will be cut up and further decontamination will be attempted. Upon achievement of the decontamination standard, the tanks would then be disposed as scrap. If decontamination cannot be successfully achieved, it would then be necessary to appropriately dispose of the tanks as a solid waste.

Ancillary piping within the tank farm will be decontaminated in a complementary manner.

As part of an orderly shutdown procedure, oily water will be processed through the facility treatment system. Oily sludges and solids will be placed in appropriate containers and shipped off-site for proper disposal.

CLOSURE OF TANK FARM CONTAINMENT

Once tanks within the tank farm have been successfully decontaminated, the containment area will be addressed. Manual scraping will be performed to remove any hardened material. The containment area will then be pressure washed until the visual inspection performance standard is achieved. Final rinsate samples will be collected as QA/QC

confirmation of decontamination status to ensure that all hazardous compounds have been removed.

CLOSURE OF CONTAINER STORAGE AREA

Maximum container storage:	non-hazardous drums:	1,000
	hazardous drums:	60
	30-yard roll off boxes:	1
	20-yard roll off boxes	5

Upon closure, any container in storage will be tested as necessary to confirm hazardous waste classification status, removed, and shipped to a proper disposal facility. Once all containers are removed, decontamination of the container storage will take place. Manual scraping will be performed to remove any hardened material. The containment area will then be pressure washed until the visual inspection performance standard is achieved. Final rinsate samples will be collected as QA/QC confirmation of decontamination status to ensure that all hazardous compounds have been removed.

All materials used in the decontamination will be either processed through the facility waste treatment system, or contained and shipped off-site to the proper disposal facility.

DECONTAMINATION OF WASTE TREATMENT SYSTEM

Once wastewater generated by the decontamination of the tanks and containment areas has been processed, the waste treatment system will be decontaminated. Tanks will be decontaminated in a manner similar to the storage tanks. Manual scraping will be performed to remove any hardened material. The waste treatment equipment and associated containment areas will then be pressure washed until the visual inspection performance standard is achieved. Final rinsate samples will be collected as QA/QC confirmation of decontamination status to ensure that all hazardous compounds have been removed.

VISUALLY CONTAMINATED SOILS

The facility is designed to prevent the contamination of surrounding soils. At the time of the closure, any surficial soils exhibiting obvious contamination will be excavated and tested prior to appropriate disposal.

CLOSURE ASSESSMENT

Rule 761.800(4) requires the completion of a Closure Assessment. The closure assessment may be implemented either in parallel with or at the conclusion of the general

decontamination of the facility. Waste material generated through investigation will be managed to the maximum possible extent through the facility waste management and treatment systems. Otherwise, investigative wastes will be separately managed, tested, and appropriately disposed.

The Closure Assessment is based upon a reconnaissance-level soil and groundwater investigation to determine whether the facility has impacted soils and groundwater. As such, the initial Closure Assessment will not provide a complete horizontal and vertical characterization of any discovered contamination. The comprehensive development of a Site Conceptual Model and Site Characterization would be addressed as a contingent item.

A specific investigation plan will be developed at the time of closure. A Site Specific Health and Safety Plan will be developed in accordance with OSHA 1910.120. The Florida One-Call utility notification procedure will be followed. Requirements for the use of Florida registered Professional Engineers, Geologists, and Certified Laboratories will be addressed. The intent will be to generate information that will meet the Florida Brownfields Program information requirements.

The reconnaissance Closure Assessment investigative procedure is based on the use of Geoprobe techniques where groundwater is above the soil/bedrock interface. If groundwater is below the soil/bedrock, other drilling techniques appropriate to the site geology will be required.

Soil sampling will be accomplished by either grab samples from Geoprobe liners or samples from auger split-spoon sampling. Soils samples will be selected for testing based upon visual and field meter evidence of contamination status. Samples will be obtained from the 0-2 foot Direct Contact interaction zone. If obvious contamination extends to the soil/bedrock interface, samples will be obtained at the interface. Intervening samples at depth will also be collected based on observed site conditions.

Geoprobe?

Groundwater status will be determined by installing temporary monitoring wells in the Geoprobe or auger test borings. Test borings will not be completed as permanent monitoring wells unless site-specific conditions observed during the investigation warrant.

Petroleum product contaminants of concern are defined in Table A of 62-770 FAC. Soil and groundwater samples will be tested for the specified constituents using the specified or any proposed alternative analytical methods. The regulations at 40CFR279.54(h)(1)(i) require facility decontamination and management of wastes. For the purposes of this closure plan, a determination of whether soil and/or groundwater contamination is present will be made by reference to Florida Clean-up Target Levels as defined at 62-777-170 FAC. Additional samples may be analyzed for a broader range of constituents to evaluate the site status with respect to Soil Clean-up Target Levels under both the residential and commercial/industrial land use scenarios. The exact number of samples

will be determined at the time of closure activities. Sufficient samples will be collected to ensure statistical significance. Additional TCLP analysis may be required for the D-listed constituents, as per 40 CFR Part 261.

If soil and/or groundwater are determined to be contaminated by the reconnaissance Closure Assessment, it will be necessary to implement a more comprehensive Site Characterization and Groundwater Quality Assessment Plan as required by 40 CFR 265.93 utilizing the administrative procedures of the Florida Brownfield Program. A Site Investigation Plan to establish the horizontal and vertical extent of contamination will be prepared and submitted to FLDEP for approval. The Groundwater Quality Assessment Plan will include the number, location, and depth of wells; sampling and analytical methods for those hazardous wastes or hazardous waste constituents in the facility; evaluation procedures, including any use of previously-gathered groundwater quality information; and a schedule of implementation. The resulting Site Characterization Report will include, at a minimum, the calculated or measured rate of migration of hazardous waste or hazardous waste constituents in the groundwater. If necessary, a Corrective Action Program will be proposed and implemented to achieve the soil and groundwater Clean-up Target Levels. If it proves to be impractical to satisfactorily decontaminate the site, then the Closure and Post-Closure Care requirements of 40 CFR 265.310 apply. These include requirements for any long-term soil and groundwater monitoring.

If groundwater is monitored, USFRSMA will keep records throughout the closure and post-closure period. In addition, USFRSMA will annually submit to the Regional Administrator, a report containing the results of the groundwater assessment and/or monitoring program that will include, at a minimum, the calculated or measured rate of migration of hazardous waste or hazardous waste constituents in the groundwater during the reporting period. This information will be submitted no later than March 1 following each calendar year.

Facility closure will be performed in a timely fashion. All accumulated materials will be characterized for proper disposal. Material shipments will take place within 10 working days of final characterization. Tanks and equipment will be decontaminated within 60 calendar days.

CLOSURE COST ESTIMATE

The Closure Plan is based on an orderly planned shutdown of the facility by USFRSMA. FLDEP requires, however, that the Closure Cost estimate be based on a worst-case scenario. That scenario is generally considered to be an unplanned situation in which the State will be responsible for implementing site closure using contractors hired by the State. It assumes that all tanks are full of material and that all contents of all tanks must be characterized to determine hazardous waste classification status. It also assumes that

the on-site treatment processing equipment is not operational and that all materials must be transported off site for processing and appropriate disposal. The demolition of facilities is not considered to be a requirement for decontamination.

The Closure Cost Estimate is presented as Table 8-2 at the end of this attachment. The cost estimate utilizes Year 2001 Florida Prevailing Wage Rates with typical Contractor Billing Rate Multipliers. The Cost Estimate includes the Closure Assessment reconnaissance soil and groundwater investigation. A cost allowance is included for the clean-up of areas of surficially stained soil as part of the basic site decontamination. The cost estimate includes a Contingency of 15 percent and an Administrative Cost of 10 percent. Should contamination be discovered, the Cost Estimate does not include any costs for a more comprehensive Site Characterization, Groundwater Assessment, Corrective Action, or long-term monitoring.

The total closure Decontamination Cost Estimate for the USFRSMA Pompano Beach facility is $592,952.

USFILTER RECOVERY SERVICES MID-ATLANTIC
POMPANO BEACH, FLORIDA FACILITY
TABLE 8-2
CLOSURE DECONTAMINATION COST ESTIMATE

Unit Transportation and Disposal Costs

Oily water	$0.16	$/Gal
Oily Sludge Liquid	$1.44	$/Gal
Oily Solids (Non-Haz)	$42.00	$/Ton
Oily liquids (Haz)	$1.25	$/Gal
Oily Solids (Haz)	$350.00	$/Ton
Virgin vehicle fuels	$0.00	$/Gal (may assume zero cost with salvage value)

NOTE:
ALL COSTS REPRESENT COMMERCIAL THIRD PARTY COSTS FOR SITE AT FULL CAPACITY

		Lump Sum
Site Safety and Operations Plan	10000	$10,000

TANKS - DISPOSAL OF INVENTORY AND DECONTAMINATION

		$/Sample	
Total Number of Tanks	31		
Tank Content Characterization TCLP+PCB		$1,200	$37,200

Maximum Inventory Tank Liquids		% vol. Pumpable	Pump volume	$/Gal Disposal cost as oily water	Total Disposal Cost
Total Number of Tanks	31				
Total tank volume, gal	405,000	90	364500	$0.16	$58,320
vehicle diesel, gal	16500	95	15675	$0.00	$0

Liquid/sludge by Vac Truck		% vol.Vac Truck	Vac volume	$/Gal Disposal cost as oily sludge	Total Disposal Cost
Total Number of Tanks	31				
Total tank volume, gal	405000	3	12150	$1.44	$17,496
vehicle diesel, gal	16500	5	825	$1.44	$1,188

Note: Confined Space Procedures for Tank Entry-PPE Level C if Required

Solids Removal		% vol. Solids	Tons Solids volume	$/Ton Disposal cost as oily solids	Total Disposal Cost
Total Number of Tanks	31				
Total tank volume, gal	405000	7	138.915	$42.00	$5,834
vehicle diesel, gal	16500	0	0	$42.00	$0

Initial Tank Cleaning for 24 Hours with Steam Condensate (as % tank volume)		% vol. Vac Truck	Gal Vac Volume	$/Gal Disposal cost as oily sludge	Total Disposal Cost
Total Number of Tanks	31				
Total tank volume, gal	405000	2	8100	$1.44	$11,664
vehicle diesel, gal	16500	0	0	$1.44	$0

High Pres. Steam Clean (as % tank volume)		% vol. Vac Truck	Gal Vac Volume	$/Gal Disposal cost as oily water	Total Disposal Cost
Total Number of Tanks	31				
Total tank volume, gal	405000	3	12150	$0.16	$1,944
vehicle diesel, gal	16500	2	330	$0.16	$53
(includes associated piping, appurtances, etc)					

Containment Steam Clean (as % tank volume)		% vol. Vac Truck	Gal Vac Volume	$/Gal Disposal cost as oily water	Total Disposal Cost
Total Number of Tanks	31				
Total tank volume, gal	405000	2	8100	$0.16	$1,296
vehicle diesel, gal	16500	0	0	$0.16	$0

Closure cost estimate date: 09/29/02

Container Storage Areas	Number Units	Gal or Tons total volume	Gal or Tons $/Unit T&D)	
Non-Haz Drums, solids	750	195	$42.00	$8,190
Non-Haz Drums, liquids	250	13750	$0.16	$2,200
Haz Drums, Liquids	30	1650	$1.25	$2,063
Haz Drums, solids	30	7.8	$350.00	$2,730
Roll-off boxes (@20cy/box)	5	130	$42.00	$5,460
Surficial stained soil boxes	2 General cleanup	52	$42.00	$2,184
Container Characterization - 10% of Drums + rolloff boxes				
Number analytical samples	113		TCLP cost $1,200.00	$135,600

Inventory & Decontamination Manpower Costs

Classification	Florida 2001 Prevailing Wage Rate	Contractor Billing Rate Multiplier	Total Cost for 8-hr day
Engineer, Manager	33.76	3.5	945.28
Project Engineer	21.46	3.5	600.88
Haz Waste Laborer	13.35	3.2	341.76

Assume 40 Work Days for Disposal of Material Inventory and
Labor Crew Size 5 Decontamination of Tanks and Site Equipment

Classification	Man-days	Daily Cost	Total Cost	
Engineer, Mgr @33%time	13	945.28	$12,478	
Project Engineer, Site Supervisor	40	600.88	$24,035	
Haz Waste Laborer	200	341.76	$68,352	
			$104,865	**$104,865**
Summary Report of Decontamination Activities		Lump Cost	$10,000	**$10,000**

	Number days	Cost		
Equipment Rental Costs, Supplies, Safety, Etc.	40	$500	Per day	**$20,000**
Cleanup Verification Samples (#tanks + 30%)	40	$250	Per sample	**$10,075**

Soil and Groundwater Site Assessment

	Lump Costs	
Drilling (Geoprobe)	$5,000	(Initial Phase II Reconnaissance Level)
Analytical (20 samples)	$9,000	(includes investigative material disposal)
Geoscience Labor	$12,000	(PPE at Level D)
Total	$26,000	**$26,000**

Total Decommissioning Cost		**$474,362**
Contingency %	15	$71,154
Administrative %	10	$47,436
TOTAL CLOSURE DECONTAMINATION COST ESTIMATE		**$592,952**

NOTE: Cost Estimate is based upon removal of inventory and the decontamination of the facility to a safe clean condition suitable for further ordinary business usage of the facility or disposition of the facility through ordinary bankruptcy proceedings. The Cost Estimate does not include demolition of any tanks or structures to a greenfield condition.

USFILTER RECOVERY SERVICES MID-ATLANTIC, INC.
POMPANO BEACH, FLORIDA
ATTACHMENT 9
EMPLOYEE TRAINING

A schedule of USFRSMA's training is included as part of this attachment. This spreadsheet lists every employee along with the dates they received various types of training. The type of training an individual receives is directly related to their defined job responsibilities. The various types of training available to Pompano Beach personnel are Confined Space Entry, CPR, Personal Protective Equipment, Respiratory Fit and Usage, Department of Transportation Requirements, HAZCOM training, OSHA 40-hour training and 8-hour annual refresher classes.

Pompano Beach-Training

NAME	HAZCOM	40 HOUR OSHA	24 HOUR OSHA	8 HOUR ANNUAL*	DOT TRI-ANNUAL	CONFINED SPACE	CPR	FIRST AID	HAZ-PHY DUE	DOT-PHY DUE	DRUG Awareness	Respirator Fit	Forklift
Penny Fulton													
Sammy Cooper													
Joanne Goodwin													
Kellie Roberts													
Bridget Woodward													
Jennifer Rodgers													
Maria Santora													
Tony Castronovo													
JP Bluteau													
Steve Higgins													
Peter Ciocio													
Alan Aldrich													
Bill Alverson													
Fritz Cyril													
Alton (Corkey) Hummel													
Andre Vassor													
Bill Adams (William)													
Edwin Delgado													
Frank Langella													
Gary Smith													
Jerome Watson													
Jerry Durden													
Jose Ramirez													
Mike Organ													
Rene Rodriguez													
Shane Herbold													
Son Vassor													
Ron Herbst													
Ed Council													
Warren Neff													
Steve Skripp													

*Includes a review of the Marine Operating Spill Plan