USED OIL PROCESSING PERMIT APPLICATION
POMPANO BEACH FACILITY

FCC ENVIRONMENTAL, LLC
POMPANO BEACH, FLORIDA

AUGUST 2012

FCC Environmental, LLC
1280 NE 48th Street
Pompano Beach, Florida 33064
954.785.2320 phone
954.783.6913 fax

August 20, 2012

Mr. Bheem Kothur, PE
Hazardous Waste Section
Florida Department of Environmental Protection
2600 Blair Stone Rd
Tallahassee, FL 32399-2400

RE: **FCC Environmental, LLC, Pompano Beach Florida Facility**
EPA ID No. FLD 984 262 410
Used Oil Processor Permit 51348-HO-005
Permit Renewal Applications

Dear Mr. Kothur:

Please find the enclosed application package for the above referenced permit. One original and one copies have been included. Also please find the enclosed checks for the permit fee.

Should you have questions please contact me at 813-335-5341 or email at scott.crandall@fccenvironmental.com.

Respectfully
FCC Environmental, LLC

Scott Crandall, PE
Regional EH&S Director

Cc: FDEP Southeast District Office

FCC Environmental
Pompano Beach, FL
Index

APPLICATION FORM FOR A USED OIL PROCESSING FACILITY PERMIT

Part 1

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

A. General Information

1. New_____ Renewal _XX_ Modification_____ **Date old permit expires 10/20/2012**

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)
_XX_ transporters (Subpart E) under EPA ID TXR 000 078 094
_____ burners of off-spec used oil (Subpart G)
_XX_ marketers (Subpart H)
or
_XX_ disposing of used oil (Subpart I)

4. Date current operation began: __July 15, 1993

5. Facility Name: FCC Environmental, LLC

6. EPA identification number: FLD 984 962 410

7. Facility location or street address: 1280 NE 48th Street, Pompano Beach, FL 33064

8. Facility mailing address: 1280 NE 48th Street, Pompano Beach, FL 33064

9. Contact person: Bernie Korzekwinski: (954)-785-2320 Title: Branch Manager

Mailing address: 1280 NE 48th Street, Pompano Beach, FL 33064

10. Operator's name: FCC Environmental. LLC Telephone: 281-668-3300

Mailing address: 523 N. Sam Houston Parkway East, Suite 400, Houston, TX 77060

11. Facility owner's name: FCC Environmental, LLC Telephone: 281-668-3300

Mailing address: 523 N. Sam Houston Parkway East, Suite 400, Houston, TX 77060

12. Legal Structure:

XX 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: _____

Name: _____

Mailing Address: _____

Name: _____

Mailing Address: _____

Name: _____

Mailing Address: _____

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

If leased, indicate:
Landowner's name: NA
Mailing address: NA

14. Name of professional engineer: Scott Crandall Registration No.: 44650

Mailing Address: 105 South Alexander Street, Plant City, FL 33563

Associated with: FCC Environmental, LLC

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: 48S Range: 42E
UTM # : 17 589150 2907850

2. Facility size(area in acres): 2.45

3. Attach a topographic map of the facility area and 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) CESQG

2. List Applicable EPA hazardous waste codes:

D001, D004, D006, D007, D008, D018, D039, F001, F003, F005, F006 and F007 (Tank bottoms may be characteristic)

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 modifying 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 the 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(6)(a)
Form Title	Used Oil Processing Facility Permit Application
Effective Date	June 9, 2005

APPLICATION FORM FOR A USED OIL PROCESSING PERMIT

PART II - CERTIFICATION

TO BE COMPLETED BY ALL APPLICANTS

Form 62-710.901(a). Operator Certification

Facility Name: FCC Environmental, LLC EPA ID# FLD 984 262 410

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*

_____

Scott Crandall, Director of EHS

Name and Title (Please type or print)

Date:_____ Telephone: (813) 335-5341

* If authorized representative, attach letter of authorization.

DEP Form#	62-710.901(6)(b)
Form Title	Used Oil Processing Facility Permit Application
Effective Date	June 9, 2005

APPLICATION FROM FOR A USED OIL PROCESSING PERMIT

PART II - CERTIFICATION

Form 62-710.901(b). Facility Owner Certification

Facility Name: FCC Environmental, LLC EPA ID# FLD 984 262 410

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

_____
Signature of the Facility Owner or Authorized Representative*

Scott Crandall, Director of EHS
_____
Name and Title (Please type or print)

Date:_____ Telephone: (813) 335-8341

* If authorized representative, attach letter of authorization.

DEP Form#	62-710.901(6)(c)
Form Title	Used Oil Processing Facility Permit Application
Effective Date	June 9, 2005

APPLICATION FROM FOR A USED OIL PROCESSING PERMIT

PART II - CERTIFICATION

Form 62-710.901(c) Land Owner Certification

Facility Name: FCC Environmental, LLC EPA ID# FLD 984 262 410

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*

Scott Crandall, Director EHS

Name and Title (Please type or print)

Date:_____ Telephone: (813) 335-5341

* If authorized representative, attach letter of authorization.

DEP Form#	62-710.901(6)(d)
Form Title	Used Oil Processing Facility Permit Application
Effective Date	June 9, 2005

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.
4. Those elements of a closure plan requiring the expertise of an engineer.
5. Tank design for new or additional tanks.
6. Recertification of above items.

Please Print or Type

_____ Initial Certification X_____ Recertification

1. DEP Facility ID Number: FLD 984 262 410 2. Tank Numbers: Table 1

3. Facility Name: FCC Environmental, LLC

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.

_____
Signature

Scott Crandall
Name (please type)

Florida Registration Number: 44650

Mailing Address: 105 South Alexander St.
Street or P. O. Box

Plant City FL 33563
City State Zip

Date: _____ Telephone (813) 335-5341

[PLEASE AFFIX SEAL]

REVOCATION AND DELEGATION
BY AN OFFICER OF FCC ENVIRONMENTAL LLC TO AN EMPLOYEE
OF LIMITED SIGNATORY AUTHORITY

April 25, 2011

FCC Environmental, LLC (previously known as Hydrocarbon Recovery Services Inc.) (the "Company") engages in a number of business activities that require the permitting and licensing by State and/or Federal agencies or authorities. As specified by applicable permit conditions or federal, state or local law, it is important to ensure that the appropriate personnel have been designated authority to sign all environmental permits, licenses, or other related documentation or certifications.

I, Aurelio Blasco Lazaro, hereby certify that I am President of the Company and that as such I am authorized to sign documents and to certify on behalf of the Company the accuracy and completeness of information in such documents. Pursuant to the power vested in me, I hereby

REVOKE a delegation of limited signatory authority granted on July 31, 2008, on behalf of Ken Cherry and John Coyne, a copy of which is enclosed herein.

DELEGATE, to the extent indicated below, a portion of that authority to the person listed below. This delegation is effective until revoked in writing. Authority delegated to:

> Each of Ken Cherry and Scott Crandall as signatory below (each, a "Grantee") and independent of one another, all the powers and duties assigned to make, execute, authenticate, acknowledge and deliver any environmental permit, license, or other related documentation or certifications, or renewals thereof, that the Grantee may deem necessary or proper in connection with the business and affairs for the Company.

The Grantee shall have no authority hereunder to further delegate such powers and duties. This delegation may be rescinded at any time by the President of the Company or the board of directors of the Company.

Grantee:

Aurelio Blasco Lazaro, its President

Ken Cherry, as Grantee

Scott Crandall, as Grantee

FCC ENVIRONMENTAL, LLC
POMPANO BEACH, FLORIDA
ATTACHMENT 1
FACILITY DESCRIPTION

FCC Environmental, LLC. (FCC) is a full service environmental remediation company specializing in a complete array of extraction, decontamination, transport, and treatment services. FCC Environmental, LLC, incorporated in Delaware in 2010. The FCC Pompano Beach facility is a registered used oil processor, and marketer and filter transfer facility with the Florida Department of Environmental Protection (FDEP).

The company was also previously known as USFilter Recovery Services (Mid-Atlantic), Inc., an affiliate of US Filter Corporation that incorporated in Delaware in 1997 and obtained a Florida business registration in 2002. Siemens Corporation ("Siemens") acquired the stock of US Filter Corporation in August 2004. On August 31, 2006, USFilter Recovery Services (Mid-Atlantic), Inc. merged into its immediate parent company, Siemens Water Technologies Corp. On October 1, 2007 a legal reorganization created the new legal entity, Hydrocarbon Recovery Services, Inc., a wholly-owned subsidiary of Siemens Water Technologies Corp. Fomento de Construcciones Y Contratas S.A. acquired Hydrocarbon Recovery Services Inc. (HRSI) and the International Petroleum Corporation of Delaware (IPC) in January of 2008 from the Siemens Water Technologies Corporation. On July 1, 2010 HRSI changed its legal name to FCC Environmental, LLC.

The 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 registered with the FDEP as a filter transporter and transfer facility, and material processing facility. Solid waste storage is limited to 377 tons of solids in drums and roll off containers plus 13,750 gallons of liquids in drums. In addition the Pompano Beach facility is also an approved hazardous waste ten-day transfer facility. The company also currently is an FDEP-a (less than 10 drums) contractor.

The Pompano Beach facility is comprised of an oil treatment plant, a wastewater treatment facility, tank farm, drum handling and solids handling area, garage (for in-house truck maintenance), laboratory, locker room, and office buildings. Materials are brought to the facility primarily by FCC Environmental, LLC however; third party deliveries from common carriers or independent used oil transporters may be accepted in accordance with the Waste Analysis Plan (see Attachment 3). FCC Environmental, LLC is a registered used oil and used oil filter transporter, as well as a State approved hazardous waste transporter.

Primary plant operations include oil recycling, wastewater treatment, and truck unloading and loading. Used oil filters are received and transferred off-site for crushing, oil extraction, and bulking of scrap metals for recycling. Recycled oils are eventually sold as burner fuel (for energy recovery) and/or flotation oils (for recovery of phosphates), thus completing the full recycling of used oil. The Pompano Beach facility is also an approved hazardous waste ten-day transfer facility.

The FCC Environmental, LLC Pompano Beach facility has four tank batteries for a total of 31 registered tanks. All are aboveground storage tanks constructed of steel and equipped with overfill protection. All tanks and associated piping are located within secondary containment. The storage tank registration placard is kept on file at the facility.

The facility tank farm consists of eight (8) tanks with a combined capacity of 152,000 gallons in the West containment area; nineteen (19) tanks with a combined capacity of 249,000 gallons in the Central containment area; two (2) tanks with a combined capacity of 30,000 gallons in the East containment area; and two (2) tanks with a combined capacity of 60,000 gallons in the Wastewater Treatment Area as shown in Figure 2: Site Plan.

The FCC Environmental, LLC fleet in Florida is comprised of the following vehicles: 12 pick-up trucks, 27 waste oil trucks, 14 vacuum trucks, 5 combination vacuum/box trucks, 11 tractors, 12 box trucks, 3 emergency vehicles, 17 roll-off boxes, 3 dump trailers, 12 box trailers, 19 oil tank trailers, 2 roll-off trailers, 5 vacuum trailers, 3 backhoes, and 2 loaders. The FCC Environmental, LLC fleet resources will vary over time in response to changing business conditions, material handling requirements, and vehicle replacement schedules.

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

FCC Environmental, LLC Pompano Beach currently has 27 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 FCC Environmental, LLC's training requirements.

Table 1.1 – Summary of Aboveground Storage Tanks
FCC Environmental, LLC – Pompano Beach Facility
Pompano Beach, Florida

Tank ID Number	Volume (Gallons)	Primary Material Stored	Alternate Material(s) Stored*	Construction Date
West Tank Battery (Zone A)				
18	12,000	Used Oil	Diesel	6/1/93
19	25,000	Used Oil	Oil – Spec Fuel	6/1/93
22	20,000	Used Oil	Oil – Spec Fuel	6/1/99
23	20,000	Used Oil	Oil – Spec Fuel	6/1/99
24	20,000	Used Oil	Oil – Spec Fuel	6/1/99
25	20,000	Used Oil	Oil – Spec Fuel	6/1/99
26	20,000	Used Oil	Oil – Spec Fuel	6/1/99
27	20,000	Used Oil	Oil – Spec Fuel	6/1/99
Central Tank Battery (Zone B)				
1	25,000	Treated Water		11/1/2003
2	25,000	Process Waste Water	Oily Water	6/1/93
3	25,000	Oily Water		6/1/93
4	10,000	PCW	Oily Water	6/1/93
5	10,000	PCW	Antifreeze	6/1/93
6	10,000	PCW	Oily Water	6/1/93
7	10,000	Antifreeze	Oily Water	6/1/93
8	10,000	Used Oil	Oily Water	6/1/93
9	10,000	Used Oil	PCW	6/1/93
10	10,000	Used Oil	Oily Water	6/1/93
11	10,000	Used Oil	Oily Water	6/1/93
12	10,000	Used Oil	Oily Water	6/1/93
13	10,000	Used Oil	Oil – Spec Fuel	6/1/93
14	10,000	Used Oil	Oil – Spec Fuel	6/1/93
15	10,000	Used Oil	Oil – Spec Fuel	6/1/93
16	25,000	Used Oil	Oil – Spec Fuel	6/1/93
17	25,000	Used Oil	Oil – Spec Fuel	6/1/93
23D	1,500	Diesel		6/1/96
22PCW	3,000	PCW		6/1/94
East Tank Battery (Zone C)				
20	15,000	Oily Water	Oily Water	6/1/94
21	15,000	Diesel	Oily Water	6/1/94
Wastewater Treatment Area (Zone D)				
30	30,000	Process Waste Water		2008
31	30,000	Process Waste Water		2008

*Tank may be cleaned and used to alternate materials as needed. Tank labeling is changed when materials stored are changed.

MATERIALS PROCESSSED

Materials processed at the Pompano Beach facility include used oil and contaminated petroleum products, used oil filters, petroleum contact waters, used antifreeze, and petroleum contaminated material. These materials are further discussed below.

Used Oil and Contaminated Petroleum Products

Used oil and contaminated petroleum products, including off-specification virgin fuels, are recycled into an on-specification fuel oil (as defined by 40 CFR 279.11). Oily waters/wastewaters are treated, the recovered oil is recycled, and the treated wastewater is discharged to the Broward County POTW (under permit number BCWWS-0171-06).

Used Oil Filters

Used oil filters are received in containers (usually 55-gallon drums) and sent off-site to either the FCC Environmental, LLC Plant City or Ft Pierce facility for processing and subsequent recycling. FCC Environmental, LLC may receive uncrushed or pre-crushed used oil filters.

Petroleum Contact Waters

Per Florida Statute 376.303, 403.721, and Florida Administrative Code 62-740.030 (Definitions) "Petroleum Contact Water" or "PCW" mean water-containing product. "Product" means petroleum product as defined in Section 376.301(16), F.S. By definition it is a product, or water in contact with product which displays a visible sheen contained in spill containment and secondary containment areas associated with petroleum tank storage, petroleum transportation, and petroleum distribution systems. Other examples of PCW (as defined by F.A.C.) include: 1) Condensate from underground and aboveground petroleum storage tanks. 2) Water bottoms or drawdown water from a petroleum tank system as defined in 62-761/762 F.A.C. 3) Petroleum tank filler sump and dispenser sump water. 4) Recovered product or water in contact with product, which does not contain hazardous constituents other than petroleum, from first response action to petroleum spills or from petroleum contaminated site cleanups under Chapter 62-770 F.A.C. 5) Aboveground petroleum tank seal leakage water. 6) Pumpable liquids from petroleum tank cleaning operations. FCC Environmental, LLC receives all six different above referenced PCW type water/product. PCW is treated on-site prior to discharge to Broward County POTW. Product recovered during pretreatment is recycled with other recovered used oil. Alternately, PCW's may be sent to the Plant City facility for treatment, or to another properly permitted treatment facility meeting the requirements of 62-740 F.A.C.

Used and Waste Antifreeze (Glycol and Water Mixtures)

Used antifreeze and antifreeze contaminated with used oil is received by the Pompano Beach facility for recycling. FCC Environmental, LLC does not accept used antifreeze for disposal that fails a TCLP or that is RCRA regulated. Used antifreeze is segregated and bulked prior to being sent off-site for recycling to Crossroads Chemicals in Miami, FL or to another properly permitted treatment facility. Bulked antifreeze is sent via tanker truck or rail car to a licensed recycle facility. Antifreeze contaminated with used oil is processed with used oil.

Petroleum Contaminated Material: (oily wastes per 62-701.200(85), FAC)

Oily wastes, defined in 62-701.200(85), F.A.C., are those materials that are mixed with used oil and have become separated from that used oil. Oily wastes also means materials, including wastewaters, centrifuge solids, filter residues or sludges, bottom sediments, tank bottoms, and absorbents which have come in contact with, and have been contaminated by, used oil. This definition includes materials such as oily rags, granular absorbent, absorbent clay and other organic absorbent material.

Petroleum-related wastewater streams including non-hazardous groundwater, process wastewaters, and petroleum-impacted stormwaters are treated on-site prior to discharge to the POTW. Alternately, these streams may be sent to the FCC Environmental, LLC Plant City facility for treatment, or to another properly permitted wastewater treatment facility.

Oily wastes such as soils, sludges, absorbents and other materials containing recoverable used oil are received in DOT approved containers (usually 55-gallon drums). Any free-flowing oil recovered from this material is handled in the facility's used oil process. The recovered solids are profiled, sampled as needed, and either disposed in a landfill or thermally treated.

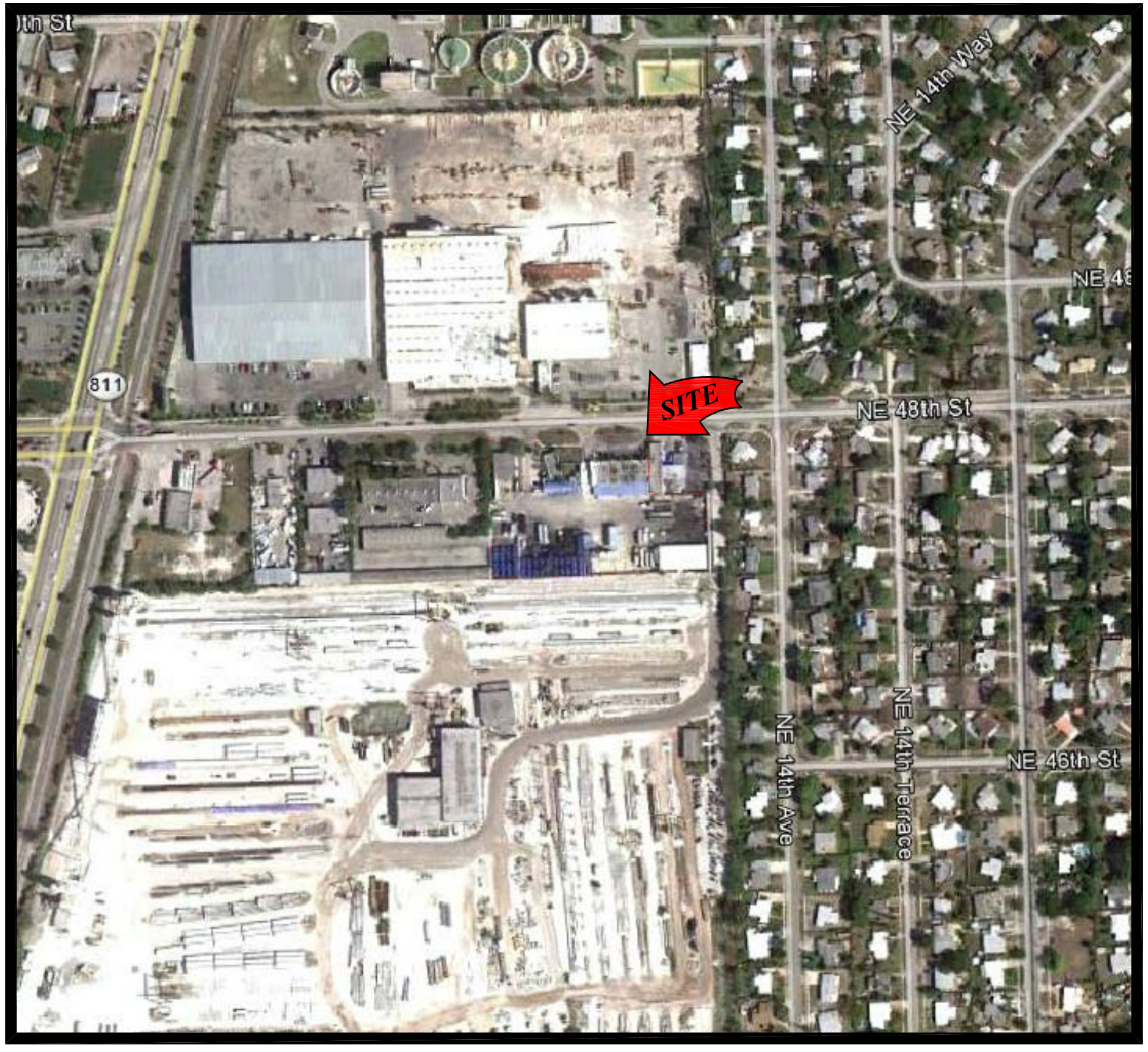
Petroleum-contaminated soils and sludges are sent either to a licensed thermal facility for treatment or disposed in a landfill, depending on the analytical data for the waste.

Non-hazardous petroleum contaminated soils, sludge, debris, personal protective equipment (P.P.E.) or other non-hazardous waste streams, not containing recoverable used oil are received in containers (usually 55-gallon drums). These materials are bulked and/or sent directly to Waste Management in Pompano Beach, FL or a permitted Solid Waste Disposal/Treatment facility.

The facility also receives non-regulated, non-hazardous liquids that may be solidified by a non-regulated, non-hazardous media (e.g. sawdust), and then sent for disposal at an approved landfill.

Hazardous Wastes

FCC Environmental, LLC is a hazardous waste transporter, and the Pompano Beach facility is an approved hazardous waste ten-day 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).



LEGEND:

SUBJECT PROPERTY

IMAGE SOURCE: GOOGLE EARTH

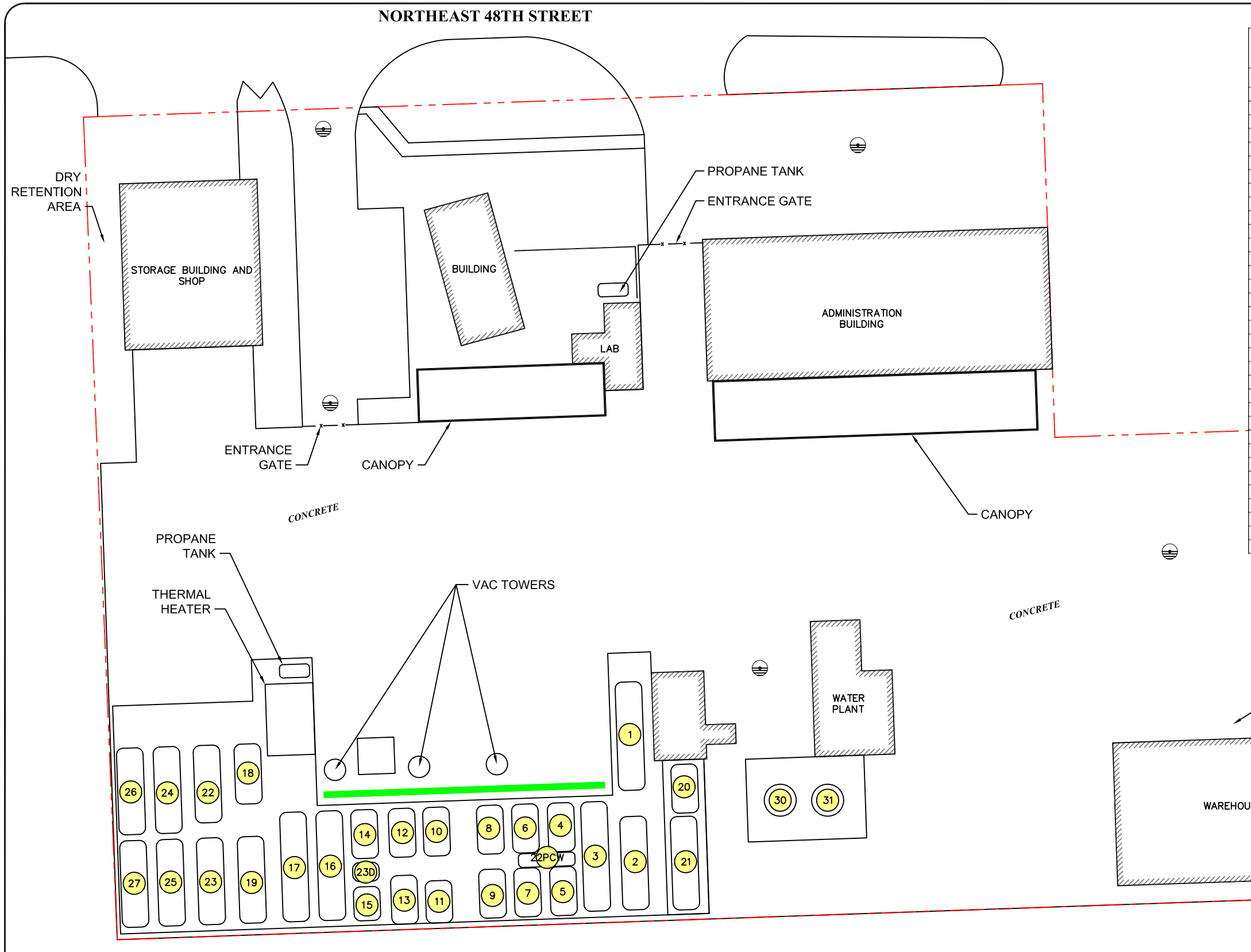
N

fcc environmental

FIGURE 1
LOCATION DIAGRAM

PROJ:
1280 NE 48TH STREET
POMPANO BEACH, FLORIDA

THIS IS NOT A LEGAL SURVEY	DRN BY: MW	DATE: 8/17/2012
VERIFY SCALE 0 1" IF NOT 1" ON THIS SHEET, ADJUST SCALES ACCORDINGLY.	CHKD BY: SC	SCALE: NTS
	FILE NAME: 1280 NE 48TH STREET POMPANO BEACH FLORIDA FI	



Tank ID Number	Volume (Gallons)	Primary Material Stored	Alternate Material(s) Stored*	Construction Date
West Tank Battery (Zone A)				
18	12,000	Used Oil	Diesel	6/1/93
19	25,000	Used Oil	Oil – Spec Fuel	6/1/93
22	20,000	Used Oil	Oil – Spec Fuel	6/1/99
23	20,000	Used Oil	Oil – Spec Fuel	6/1/99
24	20,000	Used Oil	Oil – Spec Fuel	6/1/99
25	20,000	Used Oil	Oil – Spec Fuel	6/1/99
26	20,000	Used Oil	Oil – Spec Fuel	6/1/99
27	20,000	Used Oil	Oil – Spec Fuel	6/1/99
Central Tank Battery (Zone B)				
1	25,000	Treated Water		11/1/2003
2	25,000	Process Waste Water	Oily Water	6/1/93
3	25,000	Oily Water		6/1/93
4	10,000	PCW	Oily Water	6/1/93
5	10,000	PCW	Antifreeze	6/1/93
6	10,000	PCW	Oily Water	6/1/93
7	10,000	Antifreeze	Oily Water	6/1/93
8	10,000	Used Oil	Oily Water	6/1/93
9	10,000	Used Oil	PCW	6/1/93
10	10,000	Used Oil	Oily Water	6/1/93
11	10,000	Used Oil	Oily Water	6/1/93
12	10,000	Used Oil	Oily Water	6/1/93
13	10,000	Used Oil	Oil – Spec Fuel	6/1/93
14	10,000	Used Oil	Oil – Spec Fuel	6/1/93
15	10,000	Used Oil	Oil – Spec Fuel	6/1/93
16	25,000	Used Oil	Oil – Spec Fuel	6/1/93
17	25,000	Used Oil	Oil – Spec Fuel	6/1/93
23D	1,500	Diesel		6/1/96
22PCW	3,000	PCW		6/1/94
East Tank Battery (Zone C)				
20	15,000	Oily Water	Oily Water	6/1/94
21	15,000	Diesel	Oily Water	6/1/94
Wastewater Treatment Area (Zone D)				
30	30,000	Process Waste Water		2008
31	30,000	Process Waste Water		2008

LEGEND:

- SUBJECT PROPERTY
- TRENCH DRAIN
- CATCH BASIN

fcc environmental

FIGURE 2
SITE PLAN

PROJ:
1280 NE 48TH STREET
POMPANO BEACH, FLORIDA

THIS IS NOT A LEGAL SURVEY	DRN BY: MW	DATE: 8/17/2012
VERIFY SCALE 0 — 40' IF NOT 1" ON THIS SHEET, ADJUST SCALES ACCORDINGLY.	CHKD BY: SC	SCALE: 1" = 40'
	FILE NAME: 1280 NE 48TH STREET POMPANO BEACH FLORIDA F2	

FCC ENVIRONMENTAL, LLC
POMPANO BEACH, FLORIDA
ATTACHMENT 2
PROCESS DESCRIPTION

The following is a detailed description of the facility process operations. The description includes the overall scope of operation including treatment, storage, and other processing.

FCC Environmental, LLC occupies the address at 1280 NE 48th Street (see Figure 1: Site Location Map) and operates the FCC Environmental, LLC fleet. The FCC Environmental, LLC fleet is used to collect used oils, oily wastes, PCWs, off-specification fuels, used oil filters and antifreeze from generators and transport them to the facility. The same fleet is used to deliver recycled/refined products to customers. The Waste Analysis Plan, Attachment 3, describes the sampling and analysis of used oils, oily wastes, antifreeze, products and byproducts.

Figure 2, the Site Plan shows the legal boundaries of the facilities, access points and access controls, buildings and structures, tanks and containment areas, and unloading areas.

The FCC Environmental, LLC Pompano Beach facility has a Broward County Surface Water Management License (SWM-1992-001-0), and a Multi-Sector Generic Permit for Stormwater Discharge No. FLR05F749.

When first entering FCC Environmental, LLC (off NE 48th Street in Pompano Beach), the operations office is located on the left. Through the entrance gate, at the east end of the facility, is the drum and solids handling area. In addition to drums of materials that are in some stage of transfer (e.g. used oil filters) or processing (bulking/solidification), roll-offs used for bulking of solid waste such as sludges and absorbents are staged in the drum and solids handling area.

Directly across the yard from the entrance gate is the water treatment area. A roll-off is staged by the water treatment platform to collect filter cake generated by the process, spent carbon, and other debris such as empty paper filter aid bags. Currently Tanks 31 and 32 are the water treatment feed tank and Tank #1 is the effluent collection tank. A planned expansion to the water treatment facility at Pompano Beach would add two additional water treatment feed tanks #31 and #32. The tank farm, truck loading and unloading areas, and laboratory are to the right once one has passed through the entrance gate.

All used oil and oily wastes picked up by FCC Environmental, LLC are first checked in the field using halogen-screening equipment prior to acceptance into the Pompano Beach facility (see Waste Analysis Plan, Attachment 3). All third party deliveries will be

checked at the facility for halogen content (per the Waste Analysis Plan) prior to offloading.

Upon arrival at the facility and prior to offloading, the halogen content may again be checked by facility personnel (per the Waste Analysis Plan). In addition, the materials may be checked for percent water. After checking shipping documentation and verification the material conforms to the acceptance criteria, it is cleared for transfer to the designated AST.

All petroleum and processing piping is aboveground. Incoming materials are transferred via aboveground piping to the storage tanks in secondary containment. Valves in the piping distribution system are positioned to direct the flow to the proper storage tank and the pump is started. Piping is inspected to ensure there is no leakage during the loading/unloading process. The pumping system is equipped with filter baskets to remove the large particles up to 40 Mesh. (Filter media or lint is periodically cleaned out, drummed or bulked, characterized and sent for disposal.)

Incoming materials that are particularly heavy in solids, for example tank bottom cleanings, may alternately be offloaded first through a larger and coarser screen, then pumped to the piping distribution system. (Collected solids are then shoveled into drums or bulked, characterized, and sent for disposal.)

OIL PROCESSING

Petroleum materials may be allowed to phase/gravity separate in the aboveground storage tanks. Sludges/solids may be allowed to phase/gravity separate inside the ASTs. Recovered petroleum materials are then processed on-site or, in some cases, sent off-site to the FCC Environmental, LLC Plant City facility or other properly permitted facility for subsequent processing. Materials processed on-site are filtered and treated with heat to break emulsions and evaporate excess water. The evaporated vapors are condensed and are treated on-site and discharged to POTW. Alternately heat and demulsifying chemicals may be used to break emulsions and remove excess water where necessary.

In the heat-only process, used oil is heated to around 250 degrees F in a series of shell-and-tube heat exchangers (See Figure 3). The heating media is thermal oil which travels in a closed circuit loop and is heated within the 4 MMBTU per hour fired heater. A 370 gallon elevated expansion tank allows for expansion and contraction of the thermal oil as it heats and cools down in the closed circuit. The heated used oil is then pumped to a process vessel called “Vacuum Tower #1”, and steam and light distillate vapors are pulled from the vessel’s vapor space and condensed. The condensed water and distillate (collectively called “distillate water”) drain from the condenser into Tank #9. Eventually the distillate water is transferred to the water treatment plant. The dehydrated oil is collected at the bottom of the vessel and pumped to the appropriate storage tank.

The alternate process typically involves heating a batch of used oil (generally 25,000-gallons) in one of the two processing tanks, which are Tanks #3 and #19. These two tanks are heated by passing heated thermal oil through heating coils inside the tanks. The thermal oil is isolated in its own circuit, and is heated within the 4 MMBTU per hour fired heater. Once the used oil reaches optimum treatment temperature, aprproximalety 180 degrees F, a pre-determined dosage of demulsifier is mixed into the used oil and the batch is allowed to react and separate. The separated wastewater is transferred to a Water/Oily Water tank and the processed oil is transferred to a Spec Fuel tank.

FCC Environmental, LLC produces two primary re-processed oil products; fuel oil that is equivalent to virgin No. 5 Fuel Oil, and a flotation oil for the phosphate mining industry. Both products meet the USEPA criteria for on-specification used oil fuel. The No. 5 Fuel Oil may be blended with other virgin fuels to make a variety of customer specific fuels. Any petroleum directly marketed out of the Pompano Beach facility will be sampled according to the Waste Analysis Plan to ensure it meets the on-specification criteria.

Wastewaters generated from oil processing are treated on-site by our permitted CWT subcategory B pretreatment water plant and then discharged to local Broward County POTW.

USED OIL FILTERS

Used oil filters are received crushed or un-crushed in 55-gallon drums or other approved DOT containers. The drummed oil filters are stored in the drum handling area, please see the Site Map, Figure 2. Used oil filters are stored in above ground containers which are clearly labeled "Used Oil Filters" and which are in good condition. The storage containers are sealed (by keeping bung caps closed) and stored on an impermeable surface (concrete). Any discharge is stopped, contained, managed and the container repaired or replaced. The use of granular absorbent, absorbent pads and booms in the area assure immediate response to any spill that may occur. Used oil filters are normally transferred to the FCC Environmental, LLC Plant City or Ft Pierce facilities for processing and subsequent recycling. Alternately used oil filters may be transferred to another properly permitted facility for processing and subsequent recycling.

WASTEWATER

Wastewater including petroleum contact water, industrial water, facility generated waters (including impacted secondary containment waters, process wastewaters, phase separated wasters, decanted waters, etc.) are treated on-site and discharged to the Broward County POTW (under permit number BCWWS-0171-06). Any oil recovered by gravity separation is handled with the other petroleum streams for recycling.

ANTIFREEZE

Used antifreeze intended for recycling is directly offloaded to the designated AST located within the tank farm for segregation and bulking prior to being sent off-site for recycling. Bulked antifreeze is sent via tanker truck or rail car to a licensed recycle facility. Used antifreeze that contains a high water content or waste antifreeze containing oil may be processed as non-hazardous material along with the used oil provided it is determined to be non-hazardous (see Waste Analysis Plan, Attachment 3).

OILY WASTES

Oily Wastes, such as solids containing recoverable free flowing used oil are received in drums and processed on-site. The bulked solids are transported off-site to a State permitted landfill or thermal treatment facility. Recovered petroleum is bulked and recycled with other used oils.

PETROLEUM CONTAMINATED SOLID WASTE

Petroleum Contaminated Solid Waste (not containing free-flowing liquids), determined to be non-hazardous, is bulked and sent directly to a permitted Solid Waste Disposal/Treatment facility.

All FCC Environmental, LLC generated solids are sent off site and disposed of according to State & Federal solid and hazardous waste regulations.

FCC ENVIRONMENTAL, LLC
POMPANO BEACH, FLORIDA
ATTACHMENT 3
WASTE ANALYSIS PLAN

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

FCC Environmental, LLC accepts used oil and non-hazardous oily wastes as defined under 40 CFR 279, and 62.701.200 (85) FA.C. This plan addresses the following non-hazardous materials recycled, reclaimed, and/or managed by FCC Environmental, LLC, 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 F.A.C. 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.

F.A.C. 62.701.200 (85) 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 that have come in contact with, and have been contaminated by, used oil and may be appropriately tested and discarded in a manner that is in compliance with other state and local requirements.

GENERAL WASTE CHARACTERIZATION

Prior to acceptance of the waste, generators must provide FCC Environmental, LLC with a complete characterization, including analytical results, or certification of generator process knowledge of the waste. While analytical data provide the most definitive information regarding the concentration levels of hazardous constituents and other characteristics of the waste, FCC Environmental, LLC may accept a waste stream at the facility based, in whole or in part, on detailed waste-specific information obtained from the generator of that waste. When a generator wishes to use process knowledge in characterizing its waste, FCC Environmental, LLC requires the generator to state its claim in writing prior to accepting that waste. Any claim of process knowledge must be detailed and provide supporting documentation where applicable (such as MSDSs, chemical handling descriptions, published waste analysis or studies, etc.).

FCC Environmental, LLC may require an initial laboratory analysis be conducted for a proper RCRA hazardous waste determination. If material is determined to be non-conforming or the generator has changed the generating process, FCC Environmental, LLC may require additional analysis.

PICK-UP/PUMP OUT

The driver/operator of an FCC Environmental, LLC vehicle utilized to transport used oil or oily water at each pick-up/pump out will take a retain sample. Retain samples are collected in a poly sample container and labeled with the customers name, date, container ID (if more than one retain is taken at a site). The retain samples are held for two weeks and then managed as used oil. The driver/operator must then:

1. Verify that the material being removed conforms to the physical properties of used oil or contains 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 hand held 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 (a positive reading for the hand held halogen meter calibrated 900ppm) will be tested with 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) test will not be picked up until the retained sample (accompanied by a Chain-of-Custody) can be tested for TOX (Total

Organic Halide) and/or Gas Chromatography (as applicable) at one of FCC Environmental, LLC's laboratories, or until the generator supplies certified laboratory results and/or process knowledge sufficient to rebut the hazardous waste presumption, as outlined in 40 CFR 279.44.

FACILITY OFF-LOADING

The following steps will be conducted for each shipment of used oil and oily waters received at FCC Environmental, LLC:

1. Collect a 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 in 40 CFR 279 and F.A.C. 62.710.200.
2. The sample will be screened by the on-site laboratory for chlorinated compounds content using a Dexsil Q1000 (EPA Method 9077) or other equivalent testing kit, and for percent water by distillation. The results will be recorded on the incoming load log (this includes third party deliveries). Used oil that passes the halogen screening is unloaded to one of the designated ASTs.
    a. Should a stream fail the Dexsil Q1000 (or equivalent) test, it will be segregated in an effort to obtain sufficient information necessary to rebut the hazardous waste presumption, as outlined in 40 CFR 279.44 or the load is rejected.
    b. If the hazardous waste presumption for a load cannot be rebutted successfully, the material will be rejected as non-conforming and will be managed by doing one of the following:
        1) The shipping document will be marked as non-conforming, and the load will be returned to the generator on the original shipping document it was received on.
        2) Laboratory analyses 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. The retain samples will be used to determine which customer is the generator if the used oil/oily water is found to be a hazardous waste.

ABSORBENTS, FILTERS, AND OILY WASTES

The driver/operator of an FCC Environmental, LLC vehicle used to transport industrial and non-industrial absorbent, filter streams, and other incoming oil-contaminated solids must at each pick-up/pump out verify that the material contains visible free-flowing oil so it can be managed under the used oil regulations.

Note: Used oil recovered from drum loads will be screened for halogens prior to unloading into FCC Environmental, LLC 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 off-loading, primary phase separation, 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 may be stored and tested in separate containers. The waste will be sent to a permitted treatment facility under their specific prescreening requirements.

USED ANTIFREEZE

To ensure compliance with the Florida DEP's January 2006 Antifreeze Guidance "Best Management Practices for Managing Used Antifreeze at Vehicle Repair Facilities", FCC Environmental, LLC will require an initial analysis for lead, benzene, trichloroethylene and tetrachloroethylene for used antifreeze to be processed with used oil. FCC Environmental, LLC will not require any analytical on used antifreeze that is sent for recycling.

The driver/operator of an FCC Environmental, LLC vehicle used to transport antifreeze must at each pick-up/pump out verify that the material conforms to the physical description provided by the generator's waste characterization and/or MSDS. The driver may field test the antifreeze for pH. Any significant difference between the sample's 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.

Prior to unloading any antifreeze, the antifreeze may be sampled and tested for pH. Used antifreeze for recycling is off-loaded and bulked in the aboveground storage tank designated for used antifreeze. Once a bulk load of antifreeze is accumulated, the used antifreeze is sent off site for recycling. Non-hazardous antifreeze may be processed with the used oil.

PETROLEUM CONTACT WATER (PCW)

Upon pickup/pump-out the driver will collect a representative sample of the PCW, with the proper equipment (drum or tank thief) and conduct a field pH test. PCW is pretreated prior to discharge to the POTW. Product recovered during the pre-treatment phase is recycled with other recovered used oil.

INDUSTRIAL WASTEWATER

Industrial wastewater is other wastewater which may or may not contain used oil. Upon pick-up / pump-out, the driver will collect a representative sample using a drum or tank thief and conduct a field pH test. Industrial wastewater is pretreated prior to discharge to the POTW.

PETROLEUM CONTAMINATED MATERIALS

FCC Environmental, LLC will only accept materials that are determined to meet landfill or thermal treatment criteria and are not regulated under 40 CFR Chapter 1 Part 261 (62-730 F.A.C.) as a hazardous waste. Generators must provide FCC Environmental, LLC with a complete characterization including analytical results or certification of generator process knowledge of the waste prior to the acceptance. While analytical data provide the most definitive information regarding the concentration levels of hazardous constituents and other characteristics of the waste, FCC Environmental, LLC may accept a waste stream based, in whole or part, on detailed waste-specific information obtained from the generator of that waste. When a generator wishes to use process knowledge in characterizing its waste, FCC Environmental, LLC requires the generator to state its claim in writing prior to accepting that waste. Any claim of process knowledge must be detailed and provide supporting documentation where applicable (such as MSDSs, chemical handling descriptions, published waste analysis or studies, etc.).

The driver upon pick-up will verify the material conforms to the characteristics provided by the generator during the pre-approval process.

MATERIAL STORAGE

All materials are stored in aboveground tanks registered with the FDEP, as required by F.A.C. 62-762, or in DOT-approved shipping containers. The tanks are labeled USED OIL and have the appropriate NFPA labels affixed. Tanks containing antifreeze are labeled “Antifreeze” and have the appropriate NFPA label. Drums are labeled with non-hazardous shipping labels (or other approved FCC Environmental, LLC label that contain generator information, date, and material description). Drums that contain used oil need to be labeled “used oil”.

ON-SPECIFICATION CLAIM

Used oil fuels directly marketed by FCC Environmental, LLC Pompano Beach facility will be sampled for the on-specification parameters prior to sale or further blending. The sample will be collected and analyses performed by a NELAC-certified laboratory and used to verify the conformance with the on-specification used oil requirements in 40 CFR 279.11. The used oil fuel is produced in batches. The physical properties of the material are monitored in-house using an on-site laboratory. However, a sample is collected for off-site analysis approximately every 100,000-gallons to verify that the process is resulting in a fuel oil that meets the federal on-specification parameters. The representative sample is obtained from a 25,000-gallon tank using a tank thief. The sample is taken after the oil has been processed and prior to transportation, and sent off-site for analysis.

The on-specification oil will be kept separate from any incoming used oil in a separate tank. If analysis indicates that the on-specification parameters have been exceeded, the material will not be marketed until further recycling/blending has been conducted. The table on the following page lists the parameters and methods used for testing.

Analysis conducted by NELAC certified lab	
Parameter	**Method**
Total Halogens *	EPA 9075
Organic Halogens	EPA 8021B
Gravity API @ 60°F	ASTM D-287
Heat of combustion, BTU/gallon	By calculation
Viscosity SUS @ 100°F	Visgage
Flashpoint, °F *	EPA 1010/ASTM D-93
Ash, wt. %	ASTM D-482
PCBs *	EPA 8082
Sulfur, wt. %	ASTM D-4294
Total Arsenic *	EPA 3040A/6010B
Total Cadmium *	EPA 3040A/6010B
Total Chromium *	EPA 3040A/6010B
Total Lead *	EPA 3040A/6010B
Water, vol. %	ASTM D-95

** Required for each on-specification analysis, other analysis is performed as needed.*

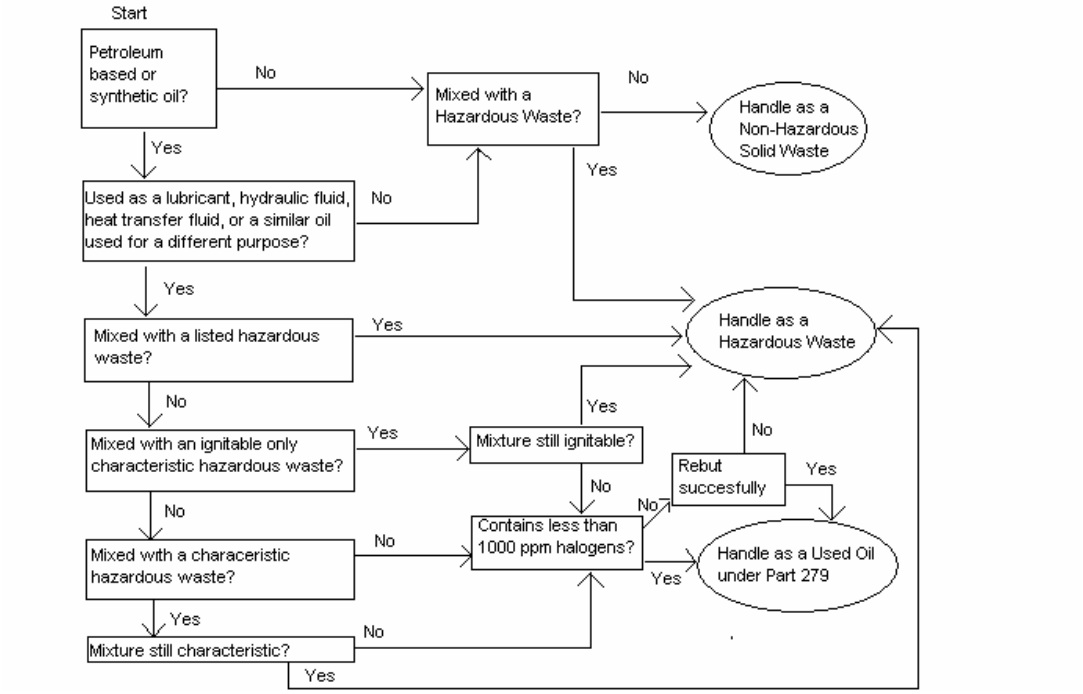
Note: Methods may be changed according to laboratory capabilities, but will be an approved equivalent.

40CFR 279.11 On-Specification Criteria		
Parameter	**Value/Units**	**Limit**
Flashpoint	100 °F	Minimum
Total Halogens	1,000ppm	Maximum
Total Halides	4,000ppm	Maximum
Total Arsenic	5ppm	Maximum
Total Cadmium	2ppm	Maximum
Total Chromium	10ppm	Maximum
Total Lead	100ppm	Maximum
PCB	2ppm	Maximum
Sulfur	0.4%	Maximum

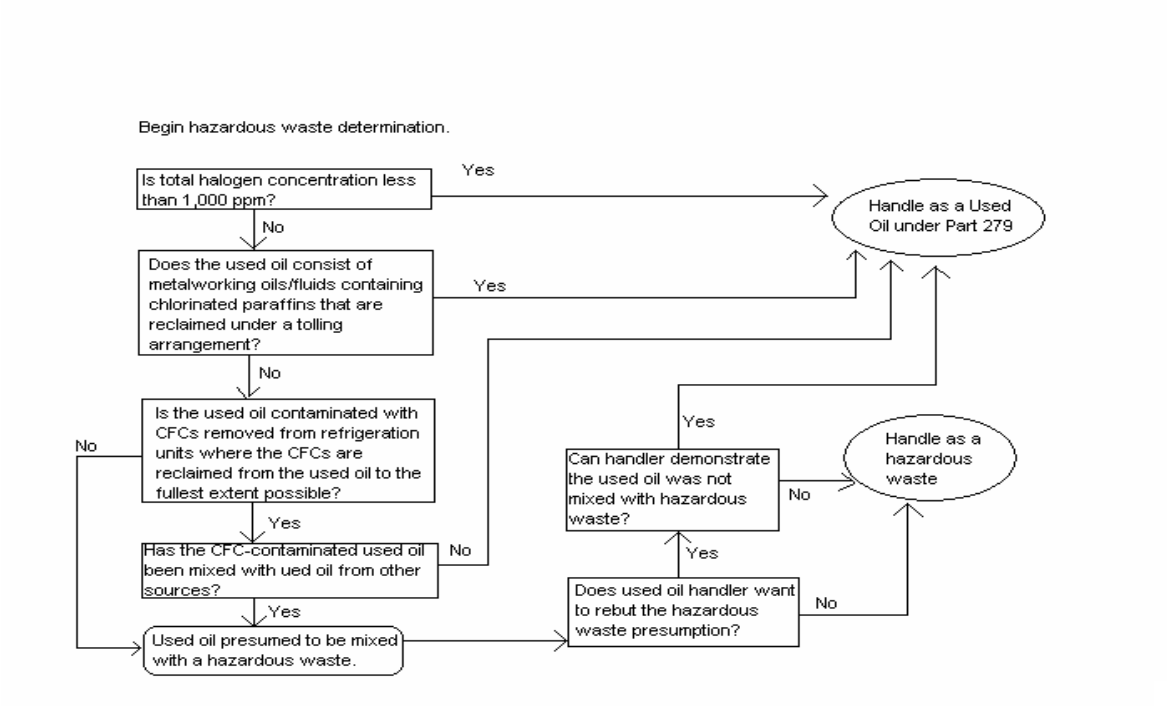
RECORDS

Analytical results performed by a state-certified laboratory to verify the on-specification claim will be maintained until closure of the facility, in accordance with 40 CFR 279.57. Analyses concerning rebuttal materials (materials that did not meet the waste acceptance procedure requirements) will also be maintained in accordance with 40 CFR 279.57. Any analysis not pertaining to this criteria will be kept for three years.

USED OIL DETERMINATION FLOW CHART



REBUTTABLE PRESUMPTION ANALYSIS FLOW CHART



FCC ENVIRONMENTAL, LLC
POMPANO BEACH, FLORIDA
ATTACHMENT 4
SLUDGE, RESIDUE, AND BYPRODUCT MANAGEMENT DESCRIPTION

SLUDGE AND FILTER SOLIDS

Sludge, residue and by-products from filters, tank bottoms and or storage tank, etc., are removed as needed, on a frequency which depends on volumes (layer) less specific on frequency of oil and oily waste received and processed at the facility.

The sludge and sump solids come from filter baskets, shaker screens, and pump sumps. These materials are commingled and taken to the filter screen and may be washed with hot water and or/or light oil such as kerosene/diesel. This washing procedure minimizes the quantity of waste that must be shipped off-site for disposal and eliminates any free liquid that may have been with the solids. Filtrate from the filter screen is collected and pumped to the designated AST for recycling with the other used oil. A hazardous waste determination is made biannually to verify any changes in the documented TCLP parameters (primarily benzene, cadmium, chromium, arsenic, lead, and others as needed). Sludge residues, filter basket solids, and other residues are shipped to a State permitted landfill or thermal treatment (waste to energy) facility. Any wastes that contain free liquids will be tested for flashpoint and TCLP parameters, prior to shipment. If found not to be characteristic, these materials may be sent to a State permitted facility for solidification and/or ultimate disposal at a permitted TSDF.

Solid material or residue that accumulates over time in the bottom of separation vessels, tanks, pump trucks, or tankers. Solids that are within the 40 CFR 261 limits are solidified and sent for disposal as a non-hazardous waste at a secured landfill or sent for thermal treatment. Solids that exceed the 40 CFR 261 criteria for classification as a characteristic hazardous waste are containerized and disposed at an off-site licensed Treatment, Storage and Disposal Facility (TSDF). Any material sent to a TSDF is accompanied by a hazardous waste manifest.

Typically, when the sludge quantity is more than 10 percent of the total tank volume, the tank will be cleaned and a sample of the sludge will be collected for analysis. The analytical testing will include, at minimum, TCLP 7 RCRA Metals (excluding mercury), TCLP Volatiles, PCB's, Flashpoint and Percent Solids. Other parameters may be analyzed when deemed appropriate. Any solids determined to exceed the 40 CFR 261 criteria for classification as a characteristic hazardous waste are disposed at an off-site licensed Treatment, Storage and Disposal Facility (TSDF). Each material sent to the TSDF is accompanied by a hazardous waste manifest.

FCC ENVIRONMENTAL, LLC
POMPANO BEACH, FLORIDA
ATTACHMENT 5
TRACKING PLAN

FCC Environmental, LLC maintains records of all materials transported from and received at the FCC Environmental, LLC facility for a minimum of three years. Incoming materials (used oil, oily water, oily wastes, antifreeze, PCW, and industrial wastewater) are tracked by completion of "Service Activity Report" (completed by driver), "Permanent Daily Report Sheet" and "Weekly Metric Report" (completed by facility).

Each driver must submit a daily "Service Activity Report" to accompany the shipping documents. Shipping documents are in accordance with the requirements specified in 40 CFR 279.56(a). The corresponding information is then entered into the facility's "Permanent Daily Report". Shipping documents will be kept on site and are filed by driver, by month at the facility. On occasion, an independent used oil hauler may deliver materials to the facility. A service order is generated for each independent hauler and the information is entered into "Permanent Daily Report" spreadsheet (hardcopy generated daily).

The "Permanent Daily Report" information is entered into FCC Environmental, LLC's electronic tracking system, which generates electronic reports that determines the total weekly amounts of material received at the facility (including independents and virgin). Copies of the reports generated on a weekly basis will be retained at the facility for at least three years. Copies of the "Service Activity Report", "Permanent Daily Report" are included as part of this section.

Transportation of materials from the FCC Environmental, LLC facilities will be conducted by FCC Environmental, LLC (EPA ID No. TXR 000 078 094), located at 523 N. Sam Houston Pkwy E. Suite 400, Houston, TX 77060. A shipping document is generated for each outgoing shipment. The shipping documents are then summarized and included on the "Permanent Daily Report" under the "unfinished product shipped out" line. The shipping document is in accordance with the requirements specified in 40 CFR 279.74. A copy of the shipping document is attached as part of this section.

The "Daily Tank Inventory" record is completed daily, and is included as part of this section. These records are also retained for a three-year period. Analytical results performed by a state-certified laboratory to verify the on-specification claim will be maintained until closure of the facility, in accordance with 40 CFR 279.57. Analyses concerning rebuttal materials (materials that did not meet the waste acceptance procedure requirements) will also be maintained in accordance with 40 CFR 279.57. Reports and

records concerning the implementation of the contingency plan will be maintained for the life of the facility.

FCC ENVIRONMENTAL, LLC
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.

The Preparedness and Prevention Contingency Plan is a combination of the facility Spill Prevention, Control and Countermeasures (SPCC) Program and the Emergency Action Plan (EAP), as permitted under 40 CFR 279.52 (b)(2)(ii)). Requirements pertaining to the Preparedness and Prevention Contingency Plan are being addressed by including both the SPCC and EAP Plans as tabbed sections at the end of this attachment.

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 document is located in the main office.

During an emergency situation, the emergency coordinator must be notified immediately. The individuals designated as Emergency Coordinators and their contact information is listed in the SPCC Plan and in this attachment. The primary Emergency Operations Center (EOC) or Command Post is located in the main office building conference room.

The EOC is the communications hub, staffed by the Emergency Coordinator and members of the emergency response teams who are responsible for coordinating the emergency incident. If the Emergency Coordinator cannot be contacted, secondary contacts are provided in both the SPCC and EAP Plans. Detailed descriptions of emergency procedures are outlined in the attached SPCC and EAP Plans.

PREPAREDNESS AND ARRANGEMENTS WITH LOCAL AUTHORITIES

Plan copies will be distributed to the local sheriff's office, fire department, and hospitals. MSDS information for materials that are handled at the FCC Ft Pierce facility (providing first aid toxicological, possible injury/illness due to fire and exposure information) will be provided to the local hospital and all potential first responders.

Emergency Equipment

In the event of an emergency, the procedures to be implemented are outlined in the Emergency Action Plan (EAP). Procedures required during a possible release of material are outlined in the SPCC Plan. Equipment that can be used during an emergency is listed at the end of this attachment, and detailed instructions are included in both plans.

During a power outage, communications can be maintained by direct connect cellular phones. Many personnel have direct connect cellular phones that can be used if the facility phone system is not operational.

All emergency equipment in all plants, such as fire monitors, emergency eyewash/showers, is inspected and flushed monthly. Equipment that operates on independent power is properly charged prior to storage.

Fire extinguishers, 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 extinguishers are checked and tagged in accordance with fire safety practices. Annual inspections of the fire extinguishers are performed by an outside contractor.

Secondary containment is also provided to contain released materials. Any sealant to be used is chosen based on its resistance to petroleum products.

A facility map that shows the location of emergency equipment, spill containment equipment, and emergency communication equipment is attached.

Fire Response

Should personnel discover a fire or smell smoke, they would contact 911 immediately and follow the procedures outlined in the EAP. The responding fire station has been provided with the FCC Environmental, LLC's facility Plans and is acquainted with the facility operations and layout. The fire station has permission to cut the lock on the gate for access to the facility in the event of an emergency after hours. An emergency contact number is posted for reponders to contact regarding inventory records. In the event of a fire, the EAP contains in Section 4.1 detailed measures to be undertaken by facility personnel.

Evacuation

All personnel, including visitors and contractors, must leave the building through the proper exit. All tank farm/drum storage area personnel will evacuate north and proceed north past the fleet maintenance building. Personnel located in the water treatment area will evacuate north through the main gate. Personnel working in the drum handling areas will evacuate to the west and then north through the main gate. All personnel will

assemble across the street from the parking area located on NE 48th Street. An evacuation route diagram is provided in Appendix A of the Emergency Action Plan (EAP).

RECORD KEEPING AND REPORTING

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:

Florida Department of Environmental Protection

Physical Address:

Southeast District Office (normal business hours) 400 N. Congress Ave, Suite 200 West Palm Beach FL 33401	Phone: (561) 681-6600 Fax: (561) 681-6770

Mailing Address:

P.O. Box 15424
West Palm Beach, FL 33416-5425

State & Local Agencies

FDEP – Tallahassee (normal business hours)	Phone: (850) 245-8707
National Response Center	Phone: (800) 424-8802
State Warning Point (24 hour- spill contact) (Emergency Management, State of Florida)	Phone: (800) 320-0519
EPA Emergency Response (Atlanta)	Phone: (404) 562-8700
Broward County Department of Planning and Environmental Protection	Phone: (954) 519-1270
Broward County Department of Compliance And Monitoring Section	Phone: (954) 831-3076

The report will include the following information:

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 by 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.).

Emergency Contacts for FCC Environmental, LLC Fort Pierce, FL Facility

1) Bernie Korzekwinski, Branch Manager- 272 Ponce De Leon St. Royal Palm Beach, FL 33411 Work: 772-462-2300 Mobile: 954-931-9338 Home: 561-736-2428

2) Juan Canas, Transportation Supervisor- 168 NW Pleasant Grove Way, Port St. Lucie, FL 34981 Work: 772-468-2300 Mobile: 954-658-6445

3) Wayne Behrsin, Regional Vice President- Jensen Beach, FL 34871
Work: 772-468-2300 Mobile: 813-478-7835

4) Scott Crandall, EHS Director- 105 S. Alexander Street, Plant City, FL 33563
Work: 813-754-1504 x 3129 Mobile: 813-335-5341 Home: 863-224-5151

5) Oil Spill Contractor- SWS Environmental First Response
Emergency Contact number: 877-742-4215

SECURITY

In accordance with 40 CFR Part 265.14 (b) there is a barrier around the active portions of the facility and a means to control entry. The facility is secured by steel chain-link fencing and/or concrete security wall on all sides. In addition, the main entrance gate is an automatic gate monitored by the office. The exit gate is also an automatic gate, normally closed. The facility typically operates 7:00 AM to 6:00 PM Monday through Friday. However the facility may occasionally be in operation 24 hours a day.

At the facility, visitors check in with the on-duty dispatcher and are required to sign in and review general safety guidelines.

Fire Protection and Emergency Action Plan

This program supersedes any existing programs.

BRANCH/FACILITY LOCATION:

Pompano Bch.

February 2012

Fire Protection & Emergency Action Plan

Table of Contents

STATEMENT OF POLICY

We are all aware of the devastation that a serious fire can cause. Our main concern is for personal safety, but fires can create loss of assets and jobs and incur large business interruption losses.

This manual is intended to provide a source of basic information to establish, improve, and maintain an effective property conservation and loss control program. The manual is based upon the policies and practices of organizations such as the National Fire Protection Association (NFPA), Underwriters Laboratory (UL), various insurance companies and insurance brokerage companies, and where applicable, OSHA Regulations.

This manual may not address all situations which may arise concerning loss prevention. When confronted with matters that are beyond the scope of this manual, other sources are available for use such as insurance company and brokerage engineering groups. These organizations can provide valuable assistance in solving those unique loss prevention problems presented.

FCC Environmental is committed to addressing an on-going loss prevention effort to protect employees and assets. While each employee is responsible for working in a safe manner and maintaining his or her aspect of the organization, management is ultimately responsible for the operations under their direction.

The project/branch/facility may substitute their own site specific manual which has been completed due to another regulatory agreement or meets the minimum requirements in this program.

Bernard Korzekwinski

Facility Manager

1.0 Purpose

The purpose of this plan is to provide procedures or guidelines for the responding to fires, and various other emergency situations.

2.0 Scope/Applicability

This program, in whole or part, applies to all FCC Environmental facilities to include administrative buildings.

3.0 Definitions

An impairment occurs any time fixed fire protection systems are removed from service. There are three types of impairments:

- Planned Impairment: Occurs when it is necessary to shut down a fire protection system for maintenance or modification. Examples: Shutting down a halon fire suppression system to relocate discharge nozzles or shutting off a sprinkler system during remodeling.

- Emergency Impairment: Occurs when an unforeseen incident or accident partially or totally impairs the protective system. Examples: Sudden break in an underground water main, forklift damages a sprinkler system facility line.

- Hidden Impairment: Occurs when it is not known that an impairment has occurred. Examples: System is shut down and inadvertently left out of service upon completion of work, shut down without proper notification, or maliciously impaired.

4.0 References

29 CFR 1910.37, 1910.38, 1910.157

5.0 Responsibility

5.1 Project/Branch Manager

The project/branch manager ensures that this procedure is implemented and followed and monitors the project's/facilities fire prevention and emergency action program to ensure that the program is in place and that it complies with this procedure.

5.2 EHS Manager

The EHS Manager monitors and audits compliance with this program.

5.3 Supervisors

Foremen, general foremen, subcontractor supervisors, and project supervisors ascertain compliance with every facet of this procedure relative to employees adhering to and understanding the fire prevention and emergency action program as it relates to their individual task assignment.

5.4 Employees

Employees will follow all rules and programs as it relates to the fire prevention and emergency action program.

6.0 Requirements

6.1 Training

All employees are to receive fire prevention and emergency action plan training upon being hired, or whenever an employee's duties or a process/procedure changes. The training must include the following:

- Review of the combined EAP/FPP
- Emergency escape procedures and emergency route assignments
- Procedures for any employees who remain to operate critical project/facility operations prior to evacuation
- Procedures to account for all employees (including visitors) after an evacuation has been completed
- The means of communicating fires and other emergencies
- Additionally under the plan and for projects/facilities that may use fire extinguishers for incipient type small contained fires or have fire extinguishers available on site, employees must be trained on the FCC Environmental Fire Extinguisher Training Topic (Exhibit IV).

6.2 Drills

Emergency evacuation drills are conducted annually for all shifts.

6.3 Plan Updates

The combined FPP/EAP must be reviewed and if necessary, updated annually or as changes occur.

6.4 Emergency Operations Center/Emergency Coordinator

Each branch project is required to establish an Emergency Operations Center (EOC). The EOC will serve as the communications hub in the event a fire or emergency incident occurs at the project/branch.

Additionally the EOC must be staffed by the branch/project appointed Emergency Coordinator and members of the emergency response teams, who are responsible for coordinating the emergency incident.

6.5 Communication Systems

In the event of an emergency the project/branch must have an established communication system to alert employees. Additionally, the project/branch must establish an emergency communication system in the event normal communication channels are knocked out or unavailable.

6.6 Emergency Escape Procedures and Routes

Escape procedures and routes must be posted conspicuously around the facility.

6.7 Assembly areas and accounting for employees

In the event of an emergency, employees must be told where to assemble after evacuating the facility. It is the responsibility of the project/branch to establish a means of accounting for all employees, visitors, contractors, etc at the established assembly area.

6.8 Procedure to shut down processes, equipment, etc.

FCC Environmental employees will shut down processes, equipment and utilities if this can be done without jeopardizing their safety.

Facility specific procedures for both shutdown and startup must be developed as a component of this plan. The personnel responsible for the shutdown and startup processes must also be trained in these procedures.

6.9 Emergency Procedures

6.9.1 Fire

IF YOU DISCOVER A FIRE OR SMELL SMOKE:

- Stay calm!
- Call the Fire Department
- State the facility name and address
- State the type of emergency
- State the exact location inside the building where the emergency has occurred.
- Answer any questions asked.

- Stay on the telephone until the responding agency states that it is okay to hang up.
- Notify your supervisor.
- Alert all others in the immediately vicinity.
- **DO NOT PLACE YOURSELF IN JEOPARDY!**
- Quickly make sure no one is left in the immediate area of the fire and close all doors.
- If you have received fire extinguisher training, use a fire extinguisher to extinguish or control the fire only in its incipient stage until the Fire Department arrives. **DO NOT FIGHT A FIRE THAT APPEARS TO BE OUT OF CONTROL**!
- Never enter a smoke-filled room.
- Touch doors before opening them. If the door is warm, DO NOT open the door as there may be fire behind the door which will spread if the door is opened. If the door is cool, open the door carefully, a little at a time, to prevent injury and the spread of smoke.
- Evacuate the building and report to your assembly area for head count.
- Report to your supervisor the names and locations of any people you know still remain in the building or are missing.
- Remain outside until directed to return by management.

6.9.2 Medical

Do not attempt to move the injured person unless the person's life is threatened by remaining in the area.

Call immediately for medical attention:

- State the facility name and address.
- State the type of medical emergency.
- State the exact location inside the building where the emergency has occurred.
- Answer any questions asked.
- Stay on the telephone until the responding agency states that it is okay to hang up.

- Contact your supervisor. (The supervisor will have someone meet the responding agency and direct them to the incident site.)
- Remain with the person until help arrives.
- Be prepared to answer questions and describe the circumstances of the medical incident.

NOTE: Follow your Post Injury Management Plan for reporting and injury management.

6.9.3 First Aid/CPR

First aid/CPR response is limited to the following:

- control external bleeding
- aid pain
- splint fractures
- provide comfort
- perform CPR

Only those employees who have had first aid/CPR training are authorized to administer first aid/CPR.

All first aid responders receive Bloodborne Pathogen control training annually.

If you would like to become First Aid/CPR certified please contact your Divisional or Regional HSE Manager.

6.9.4 Tornado

- REMAIN CALM! Don't panic or run. Think before reacting.
- Always move away from windows and if unable to reach one of the designated areas, take shelter under a bench or desk.
- Listen for instructions from your supervisor.
- If an evacuation is ordered, proceed to your shelter area for a head count.
- Remain in shelter area until directed to return by management.

6.9.5 Bomb Threat

ANY PERSON RECEIVING A BOMB THREAT CALL SHOULD:

- Keep the caller on the line as long as possible. Ask the caller to repeat the message. Record every word.
- Pay particular attention to peculiar background noises such as motors running, background music, and any other clue as to where the call is being made.
- Notify your supervisor.
- Complete the Bomb Threat Checklist. (See Exhibit III)
- Supervisors will notify the Emergency Coordinator.
- The Emergency Coordinator will:
  - Notify the Police Department.
  - Notify the Fire Department.
  - Begin an area search.
  - Announce an evacuation. (The decision to evacuate the building should be made in consultation with the police and fire departments and senior management).

IF YOU OBSERVE OF RECEIVE A SUSPICIOUS LOOKING LETTER OR PACKAGE:

- Do not try to open it.
- Notify your supervisor.
- Do not put the article in water or a confined space such as a desk or filing cabinet.
- If possible, open windows in the immediate area to assist venting potential explosive gases.
- Supervisors will notify the Emergency Coordinator.
- The Emergency Coordinator will:
  - Isolate the object and evacuate everyone in the vicinity to a safe distance.
  - Notify the Police Department.
  - Notify the Fire Department.
  - Coordinate response activities.

6.9.6 Hazardous Materials

Accidental spills or releases of hazardous materials require special response. Each project/branch that has hazard materials that may spill is required to have an Emergency Response and Contingency

Plan. The plan musts address how the project will handle hazardous material spills. Specialized training is required for any project/branch that requires its employees to actively handle spills. Additionally, other projects/branches may be required to have a Spill Prevention Control and Countermeasures Plan (SPCC). In the event of a spill, consult and initiate the plan. Report all spills immediately to your supervisor. If a spill occurs that may harm facility personnel initiate your emergency alarm system.

6.9.7 Earthquake

- REMAIN CALM! Don't panic or run. If you can stay calm, you will be better able to assess your situation. Think through the consequences of any action you plan to take.
- If you are inside a building, stay there. If you are in danger:
  - Seek cover under a sturdy desk or table.
  - Brace yourself in an inside corner away from windows.
  - Move to an inner wall or hallway.
- Choose shelter that will provide an air space, if it collapses. Watch for falling objects - plaster, bricks, light fixtures and other objects.
- Stay away from tall bookcases, high shelves, cabinets and other furniture or equipment that might slide or topple.
- Stay away from windows, sliding doors, mirrors and chimneys.
- Grab anything handy (coat, purse, newspaper, magazine, etc.) to shield your head and face from falling debris and splintering glass. If none of the above is nearby, cover your head with your hands and arms.
- DO NOT RUSH OUTSIDE!
- If you are outside, stay there. Move away from high buildings, walls, power poles, lamp posts, trees, etc. Stay away from electrical power lines. If possible, proceed cautiously to an open area.

6.9.8 Power Failure

- Stay calm!
- Stay where you are. The more persons move about in the dark greatly increases the number of potential injuries and interferes with repair crews.
- If you have a flashlight at your work area, use it.

- Without risking injury, turn off electrical power to non-critical office machines and appliances. Computer equipment should be powered down in accordance with established procedures.
- Refrain from using the telephone unless absolutely necessary.
- Follow your supervisor's instructions.
- Evacuate the building when it is safe to do so.
- Assemble in your pre-assigned areas outside the building for a head count.
- Use the 'buddy system' to account for co-workers. Report missing co-workers to your supervisor.
- Remain outside until directed to return by management.

6.9.9 Civil Disturbance/Strike

IF THERE IS A CIVIL DISORDER OCCURRENCE:

- Remain calm!
- Stay in your work area. Continue to perform your work duties until instructed otherwise.
- Do not leave the building or structure until the Emergency Coordinator instructs you to do so.
- If participants enter the building:
  - Be courteous and do not provoke an incident.
  - Notify your supervisor.
- Avoid using the telephone unless there is an emergency.
- Do not become a spectator. Leave or avoid the area to prevent injury or possible arrest.
- Do not argue or debate with a participant.
- Avoid all window areas.
- Close drapes or blinds.
- Lock doors only if it does not jeopardize evacuation in case of fire.

6.9.10 Hurricane

Hurricanes are generally slow moving systems, which allow for adequate planning and response. During hurricane season (August through November) all personnel should keep abreast of hurricane advisories and warnings.

The National Weather Service provides timely summaries of storm movements, tracks, and warning areas. Generally, the decision for work will be made 24-48 hours prior to expected landfall or in adequate time for employee response. Your supervisor will notify you of facility heavy weather actions.

In the event that landfall of a hurricane in imminent (within 24 hours) for the area of the facility, heavy weather procedures will be initiated. These will include:

- Only designated personnel will report to work. Designated personnel will initiate shutdown activities. All drums or other loose containers will be moved to safe interior locations or secured for hurricane for winds within containment.
- Trucks and other company vehicles will be moved inland by convoy.
- Once heavy weather procedures are complete, all personnel should anticipate difficult entry and a potential for downed power lines and other utilities.
- After storm passing (for an expected 24 to 48 hours) only designated personnel should report to work. Designated personnel should anticipate difficult entry and a potential for downed power lines and other utilities.
- Start-up procedures should only be initiated after verification of safe utility services, mechanical integrity, and plant operations.

All personnel should contact the facility within 24 hours of storm passing to determine the post-storm work schedule.

6.10 General Procedures

6.10.1 Cutting, Welding, And Other Hot Work

REFER TO THE FCC ENVIRONMENTAL HOT WORK PROGRAM.

6.10.2 Electrical Fire Safety

REFER TO THE FCC ENVIRONMENTAL ELECTRICAL SAFETY PROGRAMS.

6.11 Housekeeping

Proper housekeeping procedures will reduce the potential for a fire. Management is responsible for maintaining high standards for housekeeping and ensuring that all staff support and comply with good housekeeping practices.

Poor housekeeping contributes to greater loss potential by increasing fire and explosion hazards. Proper housekeeping procedures will reduce the potential for a fire, reduce maintenance costs, and present a positive reflection of management's concern for high standards.

Exits and Exit Corridors: A clear path, at least 36 inches wide, and 7.5' high for exits shall be maintained at all times.

Aisles: Aisles in storage areas and warehouses shall be maintained free and clear of storage and obstructions.

Smoking: Smoking shall only be allowed in designated areas.

Debris Disposal: Waste materials shall be removed from the buildings on a daily basis.

Fire Extinguishers: Clear access to portable fire extinguishers shall be maintained at all times.

Electrical Panels: There shall be no storage, even on a temporary basis, within 3 feet of any electric circuit breaker, fuse, motor control center or electrical panel.

Electrical Equipment Rooms: Storage is not permitted inside electrical equipment rooms.

Flammable Liquids: Areas where flammable liquids are stored and handled shall be kept clean.

Aerosols: Store aerosols inside locked metal cabinets or rooms specifically designed for aerosol storage.

Oil Soaked Rags: Rags which have been used with oily products such as linseed oil, motor oil, paint thinner, gasoline, etc. must be kept in a metal UL listed or Factory Mutual (FM) approved safety can equipped with a self-closing lid. Clean rags shall be stored in a metal container, such as a garbage pail with a lid.

Cutting and Welding: A "Hot Work" permit shall be issued for any cutting, welding, or other hot work which is conducted outside of designated maintenance areas.

Compressed Gas Cylinders: Secure compressed gas cylinders, using chains near the top and bottom of each individual cylinder. The protective cap shall be installed on any compressed gas cylinder that is not in service. Store compressed gas cylinders in specially designated areas.

Loading Docks: Stock and pallets shall not be left overnight on loading docks or where accessible to the public.

Automatic Sprinkler Systems: Sprinkler risers, control valves, etc. shall be accessible at all times. Stock, furniture, or equipment shall not be stored against sprinkler controls. Maintain a 3 feet wide path to sprinkler equipment, especially sprinkler system shut-off valves.

Sprinkler Clearance: To allow for proper water distribution from sprinkler systems, all storage and other obstructions should be at least 18-inches on a continuous plane below the sprinkler heads.

Vegetation or Grass: Remove or trim vegetation away from chimneys, buildings, transformers, and the like.

Heat Producing Appliances: Maintain a safe clearance around heat producing appliances such as boilers, heaters, cook-tops, and Bunsen burners.

6.12 Smoking

Smoking is permitted only out of doors or in the designated smoking area.

6.13 Spray Finishing

All spray painting is to be performed in an approved paint booth with the ventilation system operating. Filters and floor covering paper are to be replaced on a regular basis and disposed of in an acceptable manner.

6.14 Flammable and Combustible Liquids

All flammable and combustible liquids are to be stored approved rooms or cabinets.

6.15 Fire Doors

All fire doors shall be maintained in good operating condition. Fire doors are one of the most widely used and accepted means for protecting vertical and horizontal openings from spreading smoke and fire in a structure fire. Fire doors are manufactured to specifications designed to withstand various degrees of fire exposure for a specified amount of time.

6.16 New Construction

A fire prevention plan review shall be conducted for additions, renovations, or new construction.

A critical examination of the plans for construction or renovation will provide for adequate fire protection, avoid costly retrofitting or redesign and insurance penalties and/or extra charges as a result of inadequacies.

- FCC Environmental management shall be notified whenever there are plans to alter the fire protection, type of storage, or similar changes that may effect the fire protection, insurance program, etc.
- FCC Environmental insurance broker shall be notified of any proposed changes that will effect the property protection.
- A designee of the broker will review the proposed changes to determine if they require further review by the insurance carriers and expedite the carrier review process, if applicable.

6.17 Insurance Company Loss Prevention Surveys

Insurance property loss prevention surveys will be periodically conducted. Recommendations developed as a result of these surveys shall be carefully evaluated by senior management.

These surveys are mainly for the purpose of evaluating loss prevention programs and features to determine whether adequate protection is provided. The surveys also reinforce good fire prevention practices and provide a means of reporting conditions, recommendations and progress to management.

6.18 Fire Protection Equipment

6.18.1 Fire Protection Equipment Approvals

All fire protection equipment shall be UL listed and/or Factory Mutual approved.

6.18.2 Fire Protection System Impairments

Management is responsible for ensuring that automatic fire protection systems are in good operating condition. Special precautions shall be taken during an impairment. It is important hat the impairment be corrected as soon as possible, even if overtime labor is needed. Fire protection systems are provided to enhance life safety and property protection and to assure the continuation of operations without unnecessary interruption. Fire protection systems have a proven record of successfully extinguishing or controlling fires. However, these fire protection systems cannot be

expected to perform their intended function if they have been removed from service.

Management shall take appropriate steps to minimize and control fire protection impairments by:

- Limiting the frequency, extent, and duration of all impairments.
- Working continuously on impaired equipment until it is restored to service.
- Reducing the chance of fire by shutting down hazardous operations.
- Increasing surveillance and fire fighting capabilities.
- Restoring all systems promptly.
- Verifying by test that the systems have been properly restored.

6.18.2.1 Planned Impairment Procedures

- Notify FCC Environmental. Contact Business Unit or Regional HSE manager.
- Complete a Fire Protection Impairment Report (if required).
- Notify casualty insurance carrier as required:
  - Notify the Central Station or other agency furnishing fire protection signaling service.
  - Notify the public fire department, and in-house security and emergency response organization.
- Keep a record of the shut valve(s) or other piece of impaired equipment.
- Have everything ready (i.e., completion of excavation operations, repair parts) before shutting any valves or systems.
- The restoration operations should be on a continuous 24-hour basis. Impairments should be as short in duration as practical.
- If possible, perform the work when the facility is not operating. Restoration operations should

begin immediately if this is not considered practical.

- Shut down hazardous processes.
- Prohibit smoking throughout the affected area.
- Patrol areas where protection is out of service.
- Have extra fire extinguishers available and/or charged hose lines laid out where protection is out of service.
- Telephone or fax FCC Environmental' safety office and casualty insurance company as required and advise when protection has been restored.

6.18.2.2 Red Tag Alert System

- Attach a tag to the main shutoff valve of all inoperative sprinkler systems or other impaired equipment.
- Complete the front of the tag before attaching the tag to the valve.
- Follow the notification procedures above.
- Maintain a completed tags file.

6.18.2.3 Emergency Impairment Procedures

It may not be practical in an emergency to follow the standard procedures above. However, all of the steps should be taken as soon as possible.

Upon discovery of an impairment to sprinkler system piping or breaks in water mains to sprinkler systems, the control valve or valves will need to be closed. FCC Environmental. Management and casualty insurance company shall be advised and all other emergency precautions implemented.

6.18.2.4 Hidden Impairment Procedures

- Restore protection immediately.
- Report the discovery to the appropriate supervisor.
- Attempt to learn the reason for the occurrence.
- If the automatic sprinkler system shut-off valve(s) is monitored by a central station or proprietary

alarm system and the valve closure was not confirmed by the monitoring agency, identify the reason for the failure and implement immediate corrective measures.

- Notify FCC Environmental Management and casualty insurance company.

6.18.2.5 Restoring System

After a sprinkler valve is reopened, a 2-inch drain test shall be conducted. Observe the drop in pressure to verify that it is normal. If the pressure drop is extreme and does not build up, the system is impaired and immediate investigation is necessary.

6.19 Self Inspections/Maintenance/Testing for Automatic Sprinkler Systems

Automatic sprinkler systems shall be tested monthly. Testing will help to ensure that sprinkler systems are in good operating order. Drain tests are used to determine whether water supplies are unobstructed and clean. Inspector's tests verify the operation of the local water flow alarm, receipt of off site supervision of the alarm, where applicable, and verification of a free and unobstructed flow of water through the sprinkler system piping to the inspector's test valve discharge outlet.

Verification and procedures for testing for the following must be taken into consideration, based on the system type at your project/branch.

If the sprinkler system is monitored on site or by an outside agency such as a central station, verify that they received an alarm, what type(s), and when.

6.19.1 Monthly Inspection Reports (MIR)

FCC Environmental requires each operating facility to complete a monthly self inspection and keep on file at the facility.

6.20 Media Relations/Crisis Management

No one ever anticipates a crisis, but crises inevitably occur. And when they do, media are generally the first to call attention to them. Accidents, leaks, fires can receive instantaneous, widespread coverage, especially from television. The Facility Manager is the key contact in these crises.

The FCC Environmental Corporate Public Relations Team should be notified immediately in these situations.

The Corporate Public Relations Team has developed a crisis management program and guide in an effort to train employees of how to deal with media during crisis situations.

7.0 Records Retention

This program must be current at all times.

8.0 Forms Required

See Exhibits

9.0 Exhibits

Exhibit I – Evacuation Routes Diagram

Exhibit II - Assembly Area Diagram

Exhibit III – Bomb Threat Checklist

Exhibit IV – Fire Extinguisher Training

Exhibit V – Fire prevention and emergency action plan Annual Certification and Revision Table

10.0 Program Information (to be completed by project/branch)

10.1 Enter the type(s) of emergency alarm system(s) at the project/branch:

Sound Horn (air horn)

10.2 The testing frequency for the above alarm system(s) is/are:

Semi-Annually

10.3 Emergency numbers for fire, police and medical are posted at each phone and (enter location(s)):

Yes /Dispatch, Lab and Offices

10.4 Emergency phone numbers for:

Fire: 911

Police 911

EMT 911

Hazardous Materials Clean-up Contractor: FCC or SWS

10.5 The primary Emergency Operations Center (EOC) or Command Post is located (enter location):

FCC Environmental

1289 NE 48th St.

Pompano Bch. Fl. 33064

10.6 The alternate EOC is (enter location):

SWS

6205 nw 12TH St. Ft. Lauderdale Fl.

10.7 The project/branch Emergency Coordinator is (enter name and all applicable phone numbers):

Alton Hummel: Office 954-785-2320 Cell 954-214-2314

10.8 The alternate Emergency Coordinator(s) are (enter name(s) and all applicable phone numbers):

Anthony Fuoco: Office 954-785-2320 Cell 954-275-0456

10.9 List other types of communication systems available and the locations the equipment is stored in an emergency situation (i.e. 2-way radios, cell phones, air horns, etc):

DIRECT CONNECT, CELL PHONES

10.10 An Evacuation Route diagram is included in Exhibit I and is posted in the following locations (included on the diagram is the location of fire protection equipment, i.e. fire extinguishers, hoses, fire hydrants, standpipes etc.):

DRIVERS WINDOW, OFFICE

10.11 An Assembly Areas diagram is included in the Exhibit II and is posted in the following locations:

DRIVERS WINDOW , OFFICE

10.12 List the personnel responsible for accounting for personnel at the assembly areas:

Anthony Fuoco

10.13 First aid kits and supplies are located: (enter location(s) of first aid kits and person responsible for ensuring they are stocked):

OFFICE CLOSET, LOCKER ROOM

10.14 The following areas are designated as tornado shelter areas:

OFFICE BATHROOMS

10.15 The Facility designated smoking area(s) is:

BEHIND MAIN OFFICE AND IN OF FRONT LOCKER ROOM

10.16 The facility does have an automatic sprinkler system (list the type of system):

NA

10.17 All sprinkler control valves are locked open and are equipped with tamper alarms monitored by (write in name of company and address if applicable):
NA

10.18 Sprinkler testing and alarm monitoring records can be obtained from (list alternates):

NA

10.19 The following are the Corporate Communications contact personnel and phone numbers (list all available phone numbers for each person):
SCOTT CRANDELL 813 335-5341

KEN CHERRY 714-854-3303

10.20 Annual fire extinguisher inspections are performed by (enter name of company):

FLORIDA FLAME

10.21 Monthly fire extinguisher inspections are performed by FCC Environmental personnel (list responsible individuals):

THOMAS STORY, WILL GAUTNEY

10.22 Training records can be obtained from (list alternates):

ALTON HUMMEL, ANTHONY FUOCO

10.23 The annual evacuation drill will be held (enter date):

FEB OF EACH YEAR

EXHIBIT I

EVACUATION ROUTES DIAGRAM

Insert Facility Specific Evacuation Diagram Here

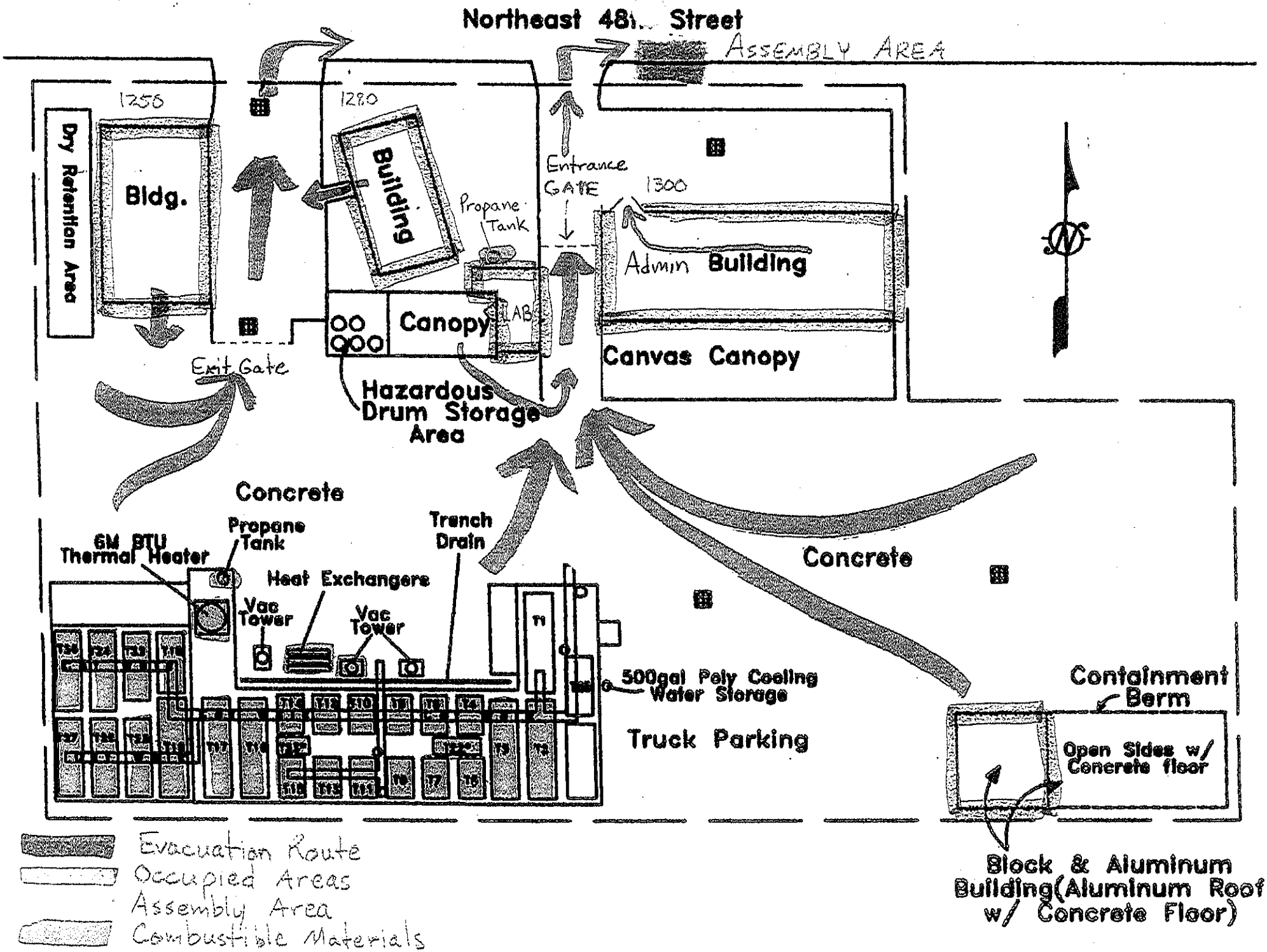

Northeast 48th Street
ASSEMBLY AREA
1250
1280
Dry Retention Area
Bldg.
Building
Propane Tank
Entrance GATE
1300
Admin Building
Canopy
LAB
Canvas Canopy
Exit Gate
Hazardous Drum Storage Area
Concrete
6M BTU Thermal Heater
Propane Tank
Trench Drain
Heat Exchangers
Vac Tower
Vac Tower
Concrete
500gal Poly Cooling Water Storage
Truck Parking
Containment Berm
Open Sides w/ Concrete floor
Block & Aluminum Building(Aluminum Roof w/ Concrete Floor)
Evacuation Route
Occupied Areas
Assembly Area
Combustible Materials

EXHIBIT II

ASSEMBLY AREA DIAGRAM

Insert Facility Specific Assembly Area Diagram Here

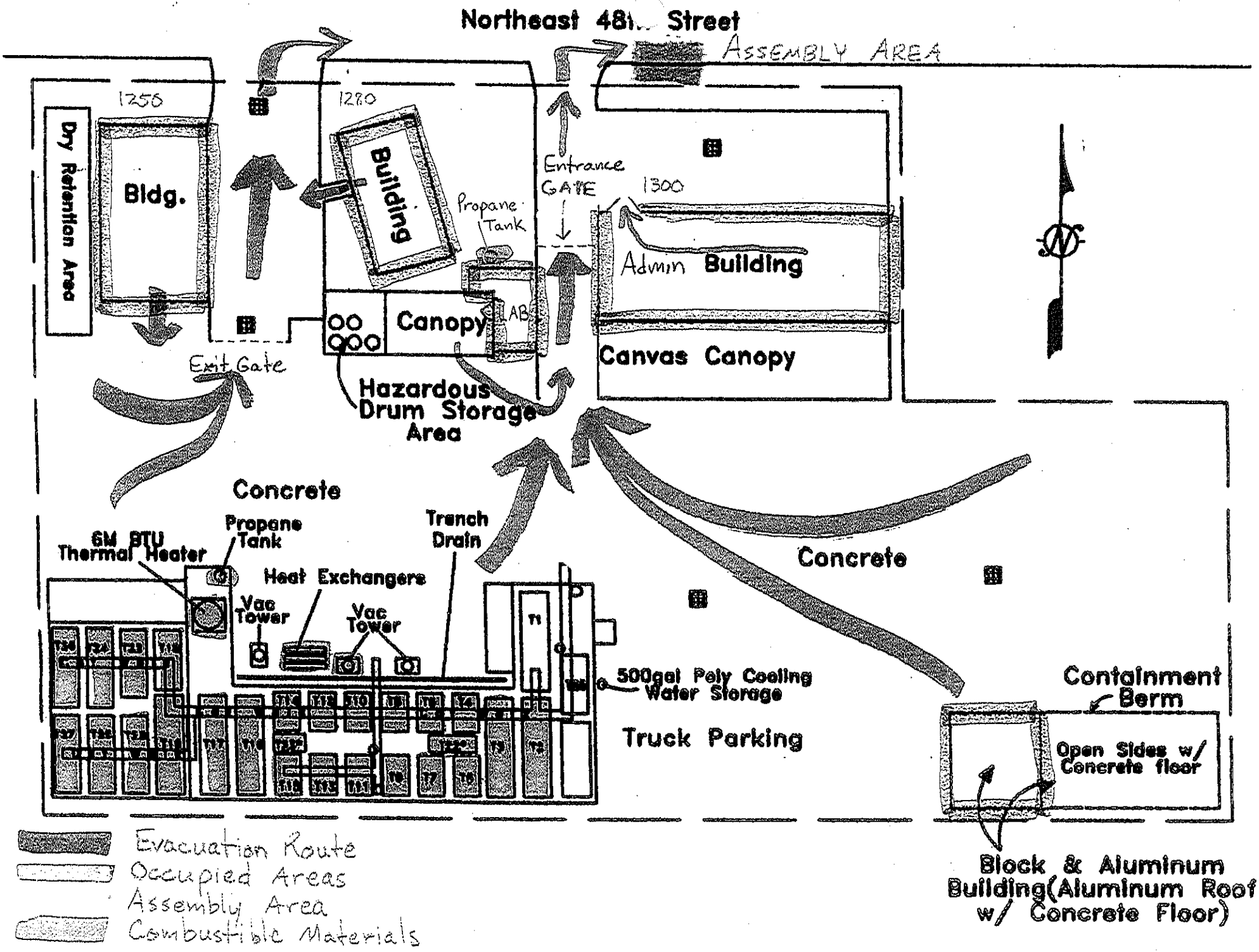

Northeast 48[illegible] Street
ASSEMBLY AREA
1250
1280
1300
Dry Retention Area
Bldg.
Building
Propane Tank
Entrance GATE
Admin Building
Canopy
AB
Canvas Canopy
Exit Gate
Hazardous Drum Storage Area
Concrete
6M BTU Thermal Heater
Propane Tank
Trench Drain
Heat Exchangers
Vac Tower
Vac Tower
T1
500gal Poly Cooling Water Storage
Truck Parking
Concrete
Containment Berm
Open Sides w/ Concrete floor
Block & Aluminum Building(Aluminum Roof w/ Concrete Floor)
Evacuation Route
Occupied Areas
Assembly Area
Combustible Materials

EXHIBIT III

B💣MB THREAT CHECKLIST

Name of operator, or person receiving call_____

Date of Call _____ Time _____ ☐ a.m. ☐ p.m.

Origin of Call: (If Known)

Local ☐ Long Distance ☐ Phone Booth ☐ Internal ☐

Identity of Caller:

Voice
- ☐ Loud ☐ Soft
- ☐ High Pitch ☐ Deep
- ☐ Raspy ☐ Pleasant
- ☐ Intoxicated ☐ _____ Other

Speech
- ☐ Fast ☐ Slow
- ☐ Distant ☐ Distorted
- ☐ Stutter ☐ Nasal
- ☐ _____ Other

Language
- ☐ Good
- ☐ Foul
- ☐ Poor

Accent
- ☐ Local ☐ Foreign
- ☐ Racial ☐ Regional

_____ Type

Manner
- ☐ Calm ☐ Angry
- ☐ Rational ☐ Irrational
- ☐ Coherent ☐ Incoherent
- ☐ Deliberate ☐ Emotional
- ☐ Righteous ☐ Nervous Laugh

Sex
- ☐ Male
- ☐ Female

Background Noise
- ☐ Office Machines ☐ Trains
- ☐ Factory Machines ☐ Music
- ☐ Animals ☐ Quiet
- ☐ Airplanes ☐ Voices
- ☐ Street Traffic ☐ _____ Other

Who did you inform about the call?_____

_____

_____

If caller seemed familiar with our facility, building or operation indicate how._____

_____

_____

_____

As well as you can, write what the caller said._____

_____

_____

BMB THREAT CHECKLIST

Questions To Ask

1. When is the bomb going to explode?_____
2. Where is the bomb?_____
3. What does it look like?_____
4. What kind of bomb is it?_____
5. What will cause it to explode?_____
6. Did you place the bomb?_____
7. Why?_____
8. Where are you calling from?_____
9. What is your address?_____
10. What is your name?_____

Remarks:_____

Person receiving call:_____

Telephone number call received at:_____

Date:_____

EXHIBIT IV

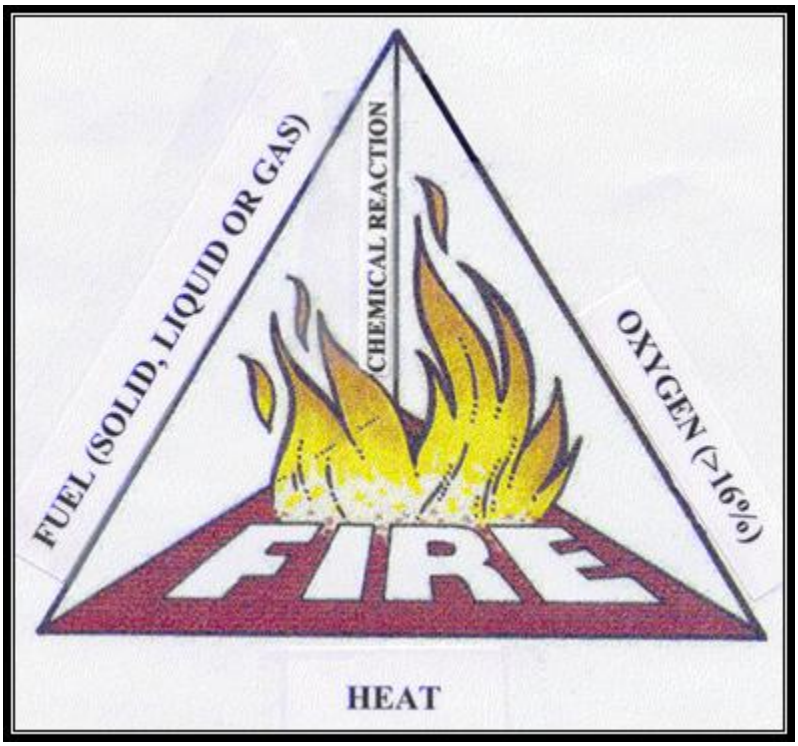
MONTHLY SAFETY TOPIC

FIRE EXTINGUISHER TRAINING

FCC Environmental has a policy of supplying fire extinguishers in all its facilities, to be used for fighting incipient stage fires. Fire extinguisher training is to be conducted for new hires and annually thereafter.

Fire Chemistry

To understand how to fight a fire, it is important to know the four elements necessary to have a fire – fuel, heat, oxygen and a chemical chain reaction. If any one of these is removed, the fire will go out.



Classifications of Fires:

All fires are grouped according to the type of fuel involved.
Class A – ordinary combustibles – wood, paper, cloth
Class B – liquids or gases
Class C – energized electrical equipment
Class D – combustible metals – magnesium, sodium, lithium

Fire Extinguishers

There are two main reasons for having fire extinguishers readily available:

- To suppress a fire along an escape route so trapped personnel can exit a burning structure; and
- To extinguish or contain a fire from the time it is discovered until the arrival of fire department personnel.

At FCC Environmental, class A, B and C fires are addressed in training. If there were ever materials present which could be involved in a Class D fire, special fire extinguishers will be brought in and training conducted.

Only incipient stage (wastebasket size) fires are to be fought.

Most fire extinguishers provided are A – B – C dry chemical. These fire extinguishers stop the chemical chain reaction, or halon. Some CO_2 extinguishers may be present. Discuss the types of extinguishers at your location and the fires they can fight.

Fire Fighting Techniques

Fire fighting at FCC Environmental is restricted to incipient stage (wastebasket size) fires.
If the fire is larger than this size, evacuate the building and then call the fire department.

If the fire is of the size that you can fight, follow this procedure:

1. Approach the fire from upwind, if applicable. Never position yourself so that the fire is between you and the nearest exit.
2. Pull the pin that locks the handle in place.
3. Test the extinguisher before getting close.
4. Aim at the base of the fire, spray with a sweeping motion to cover the entire fire.
5. Back away from the fire just before the extinguisher is exhausted.

Remember P.A.S.S.

Pull the pin
Aim at the base of the fire
Squeeze the handle
Sweep from side to side

Demonstrate fire extinguisher techniques (if you choose to actually discharge a fire extinguisher, make arrangements to have it recharged that day).

If the fire is not out, evacuate the building and call the fire department.

If the fire is out, call the fire department non-emergency number and report that you have an extinguished fire. They will probably send someone out to investigate.

Call the fire extinguisher servicing company to recharge the fire extinguisher.

Caution! Fighting a fire can be dangerous!

- Use care when lifting and carrying a fire extinguisher.
- Stay far enough back so that you don't get burned.
- Never turn your back on a fire.
- If at any time, you feel the fire is getting out of control, leave the area immediately, evacuate the building and call the fire department.

Inspection, Maintenance and Testing

Obviously, it's very important that an extinguisher is in working condition should you ever need to use one. If you have extinguishers at your facility, then you are required to:

- Inspect portable fire extinguishers each month.
- Portable fire extinguishers must be given an annual maintenance check. We must record the annual maintenance date and retain the record of inspection for one year after the entry or for life of the shell, whichever is shorter.

Other Helpful Tips for Workplace Fire Safety

- Each workplace must have at least two means of escape remote from each other to be used in a fire emergency. Know where the escape routes are in your facility.
- Fire doors must not be blocked or locked to prevent emergency use when employees are in the building.
- Exit routes from the building must be clear and free of obstructions with properly marked signs designating exits.
- All facilities must have an emergency evacuation alarm system, know yours and always evacuate when you hear it.
- All FCC Environmental facilities are required to have a current Fire Prevention and Emergency Action Plan, be familiar with yours.

What's wrong with these pictures?

Fire Extinguisher Quiz

Name _____ Date _____

What are the four elements necessary to have a fire?

a. _____
b. _____
c. _____
d. _____

What types of fires are fought by FCC Environmental employees?

a. Chemical
b. Incipient Stage (wastebasket size)
c. Building (large engulfing fires)

List the classification of fires:

1. _____
2. _____
3. _____
4. _____

List the steps to be taken to fight an incipient stage fire?

1. _____
2. _____
3. _____
4. _____
5. _____

T or F If the fire is not out, you should evacuate the building and call the fire department.

T or F If a fire extinguisher is discharged, it should be replaced to the location it was removed from?

T or F Fire extinguishers must be visually inspected each month.

The emergency evacuation alarm system at my facility is:

_____

Fire Extinguisher Quiz Key

Name _____

What are the four elements necessary to have a fire?

a. **fuel**
b. **heat**
c. **oxygen**
d. **chemical chain reaction**

What types of fires are fought by FCC Environmental employees?

a. Chemical
b. Incipient Stage (wastebasket size)
c. Building (large engulfing fires)

List the classification of fires:

1. **Class A – ordinary combustibles – wood, paper, cloth**
2. **Class B – liquids or gases**
3. **Class C – energized electrical equipment**
4. **Class D – combustible metals – magnesium, sodium, lithium**

List the steps to be taken to fight an incipient stage fire?

1. **Approach the fire from upwind if applicable**
2. **Pull the pin that locks the handle in place**
3. **Test the fire extinguisher before getting close**
4. **Aim at the base of the fire, spray with a sweeping motion to cover entire fire**
5. **Back away from the fire just before the extinguisher is exhausted**

T or F If the fire is not out, you should evacuate the building and call the fire department.

T or **F** If a fire extinguisher is discharged, it should be replaced to the location it was removed from.

T or F Fire extinguishers must be visually inspected each month.

The emergency evacuation alarm system at my facility is:

Each facility must supply the correct answer

EXHIBIT V

FIRE PREVENTION AND EMERGENCY ACTION PLAN ANNUAL CERTIFICATION AND REVISION TABLE

Fire Prevention and Emergency Action Plan Annual Certification and Revision Table		
Section	**Revision/Annual Certification**	**Date**
	x	**FEB 2012**

Spill Prevention, Control, and Countermeasure Plan
Pompano Beach Facility

FCC Environmental, LLC
Pompano Beach, Florida

Originally prepared by:
Blair D. Burgess, Jr., P.E.
Senior Engineer
ENSR International
July 2003
Project No.: 06953-024-100

Revised and Recertified By:
Carol Beth Jones, P.E.
FCC Environmental
October 2008

Revised and Recertified By:
Scott S Crandall, P.E.
FCC Environmental
August 2012

FCC Environmental, LLC
1280 Northeast 48th Street
Pompano Beach, Florida 33064
(954) 785-2320

SPILL REPORTING PROCEDURES

FCC ENVIRONMENTAL, LLC
POMPANO BEACH FACILITY
POMPANO BEACH, FLORIDA

If an oil spill occurs outside the aboveground storage tank containment system or truck loading/unloading containment system, the following procedures should be initiated:

- Determine if an emergency condition exists, defined as follows:

  Any condition which could reasonably be expected to endanger the health and safety of the public, cause significant adverse impact to the land, water or air environment, or cause severe damage to property.

  If such a condition exists, a verbal report must be provided to the City of Pompano Beach Fire Department immediately after learning of the discharge. The 24-hour number is:

  911, or (954) 786-4200

- For spills of oil to the waters of the U.S. (e.g. any volume that causes a sheen on the water surface or the adjoining shoreline), the State Warning Point, Florida Department of Environmental Protection (FDEP), U.S. Environmental Protection Agency (U.S. EPA) regional office, and National Response Center (NRC) must be notified immediately after learning of the spill, as follows:

  National Response Center (24-hour): ..... 1 – 800-424-8802

  U.S.EPA Region iv-Atlanta (24-hour): ..... 1 – 404-562-8700

  And one of the following State Reporting Divisions

  Florida State Warning Point (24-hour): ..... 1 - 800-320-0519

  FDEP-Ft. Lauderdale Office (8AM to 5 PM) ..... 1 - 954-958-5575

- The FDEP must be notified as soon as possible but not later than 24 hours after the discovery of the spill or discharge at the Ft. Lauderdale Office (number above) for spills of oil greater than 25-gallons on a pervious surface, 100-gallons on an impervious surface, and 500-gallons inside the secondary containment.
- For spills for which a fire or explosion potential exist, immediately contact the City of Pompano Beach Fire and Police Departments:

  Local Emergency: 911

- In the event of a spill outside of containment, Pompano Beach Facility Personnel will contact FCC Environmental EH&S Department as soon as possible to assist in agency notifications and spill response. Contact names and telephone numbers are provided on Page iv.
- Written reports are discussed in Section I.

SPILL RESPONSE PROCEDURES

FCC Environmental, LLC
POMPANO BEACH FACILITY
POMPANO BEACH, FLORIDA

Upon detection of a release of oil to the environment, facility personnel perform the following cleanup steps:

1. notify the Facility Manager or alternate;

2. take whatever steps are necessary to stop the release (in accordance with OSHA health and safety requirements)

3. contain the spill onsite (utilize onsite spill kits and absorbent materials);

4. assess site conditions including the potential for the release to extend beyond the property boundary and report to the Facility Manager your observations;

5. clean up (utilize onsite equipment to recover liquids and excavate shallow impacted soils/gravel) and manage properly the recovered materials including oil and affected media; and

6. if necessary, repair or replace any leaking oil storage containers or tanks prior to returning them to service.

EMERGENCY CONTACTS

FCC ENVIRONMENTAL, LLC
POMPANO BEACH FACILITY
POMPANO BEACH, FLORIDA

1. Bernie Korzekwinski, Branch Manager

   Work: 954-785-2320 x1104 Mobile: 954-931-9338

2. Alton Hummel, Operations Manager

   Work: 954-785-2320 x1121 Mobile: 954-214-2314

3. Ken Cherry, Executive VP & GM

   Work: 281-668-3311 Mobile: 713-854-3303

4. Scott Crandall, EH&S Director

   Work and Mobile: 813-335-5341

5. Oil Spill Response Contractor
   Southern Waste Services (SWS) Environmental First Response
   Emergency Contact Number 800-852-8878

CONTENTS

TABLES

FIGURES

ATTACHMENTS

1.0 INTRODUCTION

Section 311 of the Federal Water Pollution Control Act/Clean Water Act establishes the authority upon which the Environmental Protection Agency (EPA) issued regulations entitled Oil Pollution Prevention (40 CFR 112).

U. S. Environmental Protection Agency (U. S. EPA) regulations (40 CFR 112, dated July 17, 2002) require owners or operators of non-transportation related onshore and offshore facilities to prepare and implement a Spill Prevention, Control, and Countermeasure (SPCC) Plan if they have discharged or, due to their location, could reasonably be expected to discharge oil in harmful quantities into or upon the navigable waters of the United States or adjoining shorelines.

40 CFR 112.2 defines oil to include "…oil of any kind on in any form, including, but not limited to petroleum, fuel oil, sludge, synthetic oils, mineral oils, oil refuse or oil mixed with wastes other than dredged spoil."

"Navigable Waters" as defined under the Clean Water Act Section 502(7), has been interpreted to include all surface waters, including any waterway within the United States. In addition, groundwater may also be included under the definition of navigable waters, if groundwater is directly connected hydrogeologically with surface waters.

"Discharge" includes, but is not limited to, any spilling, leaking, pumping, pouring, emitting, emptying or dumping of oil (112.2(4)).

"Spill" or a "Spill Event" means a discharge of oil into or upon the navigable waters of the United States or adjoining shorelines in harmful quantities, as defined at 40 CFR 110.

Therefore, a discharge may occur without resulting in a spill. This difference can be significant as it relates to regulatory reporting responsibilities (40 CFR 112.2).

The SPCC regulations apply whenever oil storage capacities at a facility exceed the following thresholds (40 CFR 112.1 (d)(2); 112.3(a):

- single above-ground container or multiple above-ground containers equaling-1,320 gallons aggregate capacity (counting containers 55-U.S. gallons or greater); can reasonably expect a discharge to reach navigable waters of the United States; or
- underground buried storage containers-42,000 gallons aggregate capacity and are not subject to the technical requirements of 40 CFR 280 or approved State Program.

This SPCC Plan includes provisions for controls, containment and diversionary structures, monitoring equipment, personnel training, inspection and record keeping, security and spill cleanup procedures. This plan is prepared using good engineering practices, has the full approval of management to commit the resources necessary to implement the Plan, was designed in general accordance with the applicable industry standard, and details those engineering design and operations, procedures and practices in place at the site to prevent and/or contain a potential spill.

Owners or operators of a facility for which a SPCC Plan is required must maintain a complete copy of the Plan at the site if the facility is normally attended at least eight hours per day. The Plan must be available for review during normal working hours.

The SPCC Plan must be reviewed and certified by a Registered Professional Engineer. By means of this certification, the engineer or his agent, having examined the facility and being familiar with SPCC requirements, must attest the Plan has been prepared in accordance with good engineering practices (40 CFR 112.5 (b)).

The SPCC Plan must be amended within six months and implemented immediately whenever there is a change in facility design, construction, operation, or maintenance that materially affects the facility's potential to discharge oil (40 CFR 112.5 (a)). Changes include installation, removal, replacement, reconstruction, or movement of oil-containing equipment. The Plan must be reviewed once every five years and amended to include more effective prevention and control technology, if such technology will significantly reduce the likelihood of a spill event and has been proven in the field. A Registered Professional Engineer must certify all changes (40 CFR 112.3 (c)). All changes must be documented in the Plan Review and Amendment Log (40 CFR 112.5 (b)).

It is not necessary to submit the Plan to the U.S. EPA unless requested, or unless one of the following events occur (40 CFR 112.4):

- The facility discharges more than 1,000 gallons of oil into or upon navigable waters of the United States or adjoining shorelines in a single event; or
- The facility discharges 42 gallons of oil on or upon the navigable waters of the United States or adjoining shorelines during two spill events within any twelve-month period (see the Spill Reporting Procedures section at the beginning of the Plan).

Within 60 days following the occurrence of either of these events, the owner or operator of the facility must submit a written report to <u>both</u>:

U.S. EPA Regional Administrator U.S. EPA – Region IV 61 Forsyth Street Atlanta, Georgia, 30303	and	FDEP – Southeast District Bureau of Emergency Response 7251 West Palmetto Park Rd., Suite 201 Boca Raton, FL 33433 (561) 393-5877

The report must contain the following information (40 CFR 112.4):

1. name of the facility;
2. name of the owner/operator of the facility;
3. location of the facility;
4. date and year of initial facility operations;
5. maximum storage or handling capacity of the facility and normal daily throughput;
6. description of the facility, including a site plan, flow diagrams, and topographical maps;
7. a complete copy of the SPCC Plan with any amendments;
8. the cause(s) of the spill(s), including a failure analysis of the system or sub-system in which the failure occurred;
9. corrective actions and/or countermeasures taken including adequate description of equipment repairs and/or replacements;
10. additional preventive measures taken or contemplated to minimize the possibility of recurrence; and
11. other pertinent information the Regional Administrator may reasonably require regarding the Plan or spill event.

2.0 GENERAL INFORMATION

Facility Name: FCC Environmental, LLC
Pompano Beach Facility

Street Address: 1280 Northeast 48th Street
Pompano Beach, Florida, 33064

Mailing Address: 1280 Northeast 48th Street
Pompano Beach, Florida, 33064

2.1 Facility Description

The FCC Enivornmental, LLC (FCC) Pompano Beach Facility is a used oil and oily water processing plant. Used oil filters are received and transferred to other FCC facilities for processing. Petroleum contaminated solids and sludges are bulked at the facility. The facility is also a 10-day hazardous waste transfer facility.

The Pompano Beach facility consists of an office building, laboratory, miantenance shop, locker room, tank farm, water treatment plant, oil treatment plant, and solids/drum handling facility. The facility is located in the City of Pompano Beach, Broward County, Florida. The plant is located within an industrial area with some residential development.

The site began operations on July 15, 1993. The current operators acquired the facility in July 24, 2002 and ran it under the name USFilter Recovery Services Mid Atlantic, Inc. USFilter was acquired by Siemens in 2004, and the facility began operating under the name Siemens Water Technologies Corp. on August 31, 2006. On October 1, 2007, a legal reorganization created Hydrocarbon Recovery Services Inc., a wholly owned subsidiary of Siemens Water Technologies Corp. On March 1, 2008, Hydrocarbon Recovery Services, Inc. was acquired by FCC. The company changed names on July 1, 2010 to FCC Environmental, LLC.

The site is bounded on the north by Northeast 48th Street. American Paver Company is located to the north of Northeast 48th Street. Precast Specialties is located to the South of the Facility. Rain Soft Water Treatment Systems, Inc. abuts the eastern boundary of the facility. A light commercial/office building abuts the western boundary of the site. A site plan and drainage map is presented as Figure 2.

Used oil and oily water mixtures are transported to the facility by trucks of varying sizes (2600 gallons – 9200 gallons), and stored in 27 Aboveground Storage Tanks (ASTs). Used oil filters and other oily wastes such as petroleum contaminated soilds are stored and bulked at the facility. Recovered oil is processed to specification and shipped out to customers. The generated wastewater is pretreated and discharged to the Broward County Public Work Department's POTW. Recovered solids are sent off site to a non-hazardous industrial waste landfill or sent for thermal treatment. Any recovered soilds determined to be hazardous are sent to a RCRA permitted TSDF. Recovered metals are recycled offsite.

Loading and unloading is conducted within the concrete area adjacent to the concrete containment structure. The facility uses spill collection containers as primary containment to catch leaks from the valves beneath trucks during transfer procedures while loading/off-loading station.

2.2 Fixed Storage

The Pompano Beach Facility has three tank batteries, West (Zone A), Central (Zone B), and East (Zone C), which contain a total of 29 ASTs. The collected used oils may be stored in up to eight (five 20,000-gallon, one-25, 000-gallon, one 15,000-gallon, and one 12,000-gallon) ASTs in the west tank battery, nineteen (five 25,000-gallon, twelve 10,000-gallon, one 3,000-gallon, and one 1,500-gallon) ASTs in the central tank battery, and two (15,000-gallon each) ASTs in the east tank battery.

Some of the tanks are not registered with the Florida Department of Environmental Protection because they are not currently used for storing petroleum products or are considered a processing tank. The ASTs and their associated piping are constructed of steel and located in a concrete, secondary containment structures.

The location of these tanks is shown in Figure 2; the volume and contents of each tank is listed in Tables 1. The facility does not meet substantial harm criteria as defined by 40 CFR 112. Certification is provided in Attachment A.

The materials and construction of all tanks used for the storage of petroleum are compatible with the materials stored and conditions of storage. The facility is manned daily and the facility will be observed by facility employees. Abnormal conditions are noted and appropriate measures taken.

Monthly inspections are performed and documented (Attachment C). Visible oil leaks from tank seams, gaskets, rivets, and bolts sufficiently large to cause an accumulation of oil in containment areas are promptly corrected.

Total Regulated Substance Stored:

The Pompano Beach Facility may have the following approximate volume of regulated substances stored per day:

16,500-gallons Diesel
287,000 gallons Used Oil/ Specification Fuel Oil (RFO)
10,000-gallons Used Antifreeze
40,000-gallons Oily Water
33,000-gallons Petroleum Contact Water (PCW)
85,000-gallons Process waste water (Water Plant Not Regulated by 40CFR112-SPCC)
25,000-gallons Treated waste water (Water Plant Not Regulated by 40 CFR112-SPCC)

486,500-gallons Total

Tank Construction:

All the ASTs are constructed of steel meeting the standards of the Underwriter Laboratories UL142 Standards or American Petroleum Institute (API) Standards.

Containment:

Concrete containment around fixed ASTs and concrete containment at the loading/unloading area. The Pompano Beach Facility is constructed atop a liner. The loading/unloading east side is bermed and the west side is walled. The loading/unloading area has slight decline to the south where a trench drain is equipped with a pump leading to the tank farm.

West Tank Battery (Zone A)

Approximately 66 feet x 100 feet x 32 inches = 17,600 cu. ft. x 7.48 g/cu.ft.
v= 131,648 gallons
Piping and Tank Displacement with 10% margin for error = 27,615-gallons
Total AST Secondary Containment = 131,648 – 27,615 = 104,033-gallons
Net Capacity ~ 104,033 gallons vs. 25,000-gallon maximum capacity

Central Tank Battery (Zone B)

Approximately 114 feet x 70 feet x 32 inches = 21,280 cu. ft. x 7.48 g/cu.ft.
v= 159,174 gallons

Approximately 15 feet x 118 feet x 32 inches = 4,720 cu. ft. x 7.48 g/cu.ft.
v= 35305 gallons

Approximately 18 feet x 110 feet x 32 inches = 5,280 cu. ft. x 7.48 g/cu.ft.
v= 39495 gallons
Total Volume = 159,174 + 35305 + 39495 = 233,974-gallons

Piping and Tank Displacement with 10% margin for error = 49286-gallons
Total AST Secondary Containment = 233,974 – 49286 = 184,688-gallons
Net Capacity ~ 184,688 gallons vs. 25,000-gallon maximum capacity

East Tank Battery (Zone C)

Approximately 21 feet x 70 feet x 32 inches = 3,920 cu. ft. x 7.48 g/cu.ft.
v= 29,322 gallons
Piping and Tank Displacement with 10% margin for error = 5816-gallons
Total AST Secondary Containment = 29,322 – 5816 = 23,506-gallons
Net Capacity ~ 23,506 gallons vs. 15,000-gallon maximum capacity

Water Treatment Plant (Zone D) Non Regulated Waste Waters under 40 CFR 112

Approximately 22 feet x 42 feet x 6 inches = 3,920 cu. ft. x 7.48 g/cu.ft.
v= 3,455 gallons. Piping and Tank Displacement = 458-gallons
Total AST Secondary Containment = 3,455 – 458 = 2,997-gallons
Double Walled Tanks
Net Capacity ~ 35,997 gallons vs. 30,000-gallon maximum capacity

Vehicles:

4 Vacuum Trucks (3500 gallons)

1 Tanker Truck (6000 gallons)

4 Tank Trailers (7000 gallons)

1 Vacuum Truck (6000 gallons)

4 Box Trucks (5280 gallons)

2.3 Portable Storage

The facility is not using temporary storage onsite at this time.

Table 1 – West Tank Battery (Zone A)
Summary of Aboveground Storage Tank Characteristics
FCC Environmental – Pompano Beach Facility
Pompano Beach, Florida

Tank ID Number	Volume (Gallons)	Material Stored	Installation Date	Displacement (Gallons)*
18	12,000	Used Oil	6/1/1999	2860
19	25,000	Used Oil	6/1/1999	3971
22	20,000	Used Oil/RFO***	6/1/1999	2444
23	20,000	Used Oil/RFO***	6/1/1999	3166
24	20,000	Used Oil/RFO***	6/1/1999	3166
25	20,000	Used Oil/RFO***	6/1/1999	3166
26	20,000	Used Oil/RFO***	6/1/1999	3166
27	20,000	Used Oil/RFO***	6/1/1999	3166
Piping	N/A	N/A	N/A	2095

*Total height of the secondary containment wall is 32 inches. A gap of 5 inches is present between the containment floor and the tank bottom. Tank displacement was measured as the volume of the remaining 27 inches of tanks plus the tank supports for all other tanks in the containment.
*** Tanks 22 through 27 are registered and regulated to store used oil if necessary, but currently is labeled as and used to store spec fuel oil.

Table 1 (Continued)– Central Tank Battery (Zone B)
Summary of Aboveground Storage Tank Characteristics
FCC Environmental – Pompano Beach Facility
Pompano Beach, Florida

Tank ID Number	Volume (Gallons)	Material Stored	Installation Date	Displacement (Gallons)*
1	25,000	Treated Water	11/1/2003	3971
2	25,000	Process Water	6/1/1993	3971
3	25,000	Oily Water	6/1/1993	3971
4	10,000	Oily Water	6/1/1993	1628
5	10,000	Antifreeze	6/1/1993	1628
6	10,000	PCW	6/1/1993	1628
7	10,000	Oily Water	6/1/1993	1628
8	10,000	Oily Water	6/1/1993	1628
9	10,000	PCW	6/1/1993	1628
10	10,000	Used Oil	6/1/1993	1628
11	10,000	Used Oil	6/1/1993	1628
12	10,000	Used Oil	6/1/1993	1628
13	10,000	Used Oil	6/1/1993	1628
14	10,000	Used Oil	6/1/1993	1628
15	10,000	Used Oil	6/1/1993	1628
16	25,000	Spec Fuel Oil ***	6/1/1993	3971
17	25,000	Spec Fuel Oil ***	6/1/1993	3971
23D	1,500	Diesel	6/1/1993	603
22PCW	3,000	PCW	6/1/1993	1047
Piping	N/A	N/A	N/A	3765

*Total height of the secondary containment wall is 32 inches. A gap of 5 inches is present between the containment floor and the tank bottom. Tank displacement was measured as the volume of the remaining 27 inches of tanks plus the tank supports for all other tanks in the containment.
** Tanks 7 through 17 are registered and regulated to store used oil, but may at alternate times be used to store oily water, spec fuel oil, or used antifreeze. The tanks will be cleaned and relabeled for changes in service. Table 1 reflects the material being stored in the tank at the time

Table 1 (Continued)– East Tank Battery (Zone C)
Summary of Aboveground Storage Tank Characteristics
FCC Environmental – Pompano Beach Facility
Pompano Beach, Florida

Tank ID Number	Volume (Gallons)	Material Stored	Installation Date	Displacement (Gallons)*
20	15,000	Oily Water (Water Plant Feed Tank)	6/1/1993	2444
21	15,000	Diesel	6/1/1993	2444
Piping	N/A	N/A	N/A	400

*Total height of the secondary containment wall is 32 inches. A gap of 5 inches is present between the containment floor and the tank bottom. Tank displacement was measured as the volume of the remaining 27 inches of tanks plus the tank supports for all other tanks in the containment.

Table 1 (Continued)– Water Plant (Zone D)
Summary of Aboveground Storage Tank Characteristics
FCC Environmental – Pompano Beach Facility
Pompano Beach, Florida

Tank ID Number	Volume (Gallons)	Material Stored	Installation Date	Displacement (Gallons)*
30	30,000	Water Plant Feed Tank- Not Regulated under 40 CFR 112	2008	Double Walled Tanks Containment
31	30,000	Water Plant Feed Tank- Not Regulated under 40 CFR 112	2008	Doubled Walled Tank
Piping	N/A	N/A	N/A	400

3.0 SPILL HISTORY (40 CFR 112.7[A])

All spills occurring within the containment are documented in the facility operations log. All spills occurring outside the containment are documented in a separate spill log including a written description of each spill, corrective action taken, and plans for preventing recurrence as required by 40 CFR 112.7(a). No reportable spills have occurred at this facility in the 12 months prior to certification of this SPCC plan.

4.0 POTENTIAL SPILL VOLUMES, DIRECTION AND RATES (40 CFR 112.7[B])

Table 2 presents spill direction, volumes, and flow rates as determined for several potential types of failure at the Pompano Beach Facility.

Table 2
Potential Spill Volumes and Rates
FCC Environmental – Pompano Beach Facility
Pompano Beach, Florida

Potential Type of Failure	Quantity	Rate	Direction of Flow
Complete failure of full tank	up to 25,000 gallons	Instantaneous	Contained by secondary containment
Partial failure of full tank	> 1 to 25,000 gallons	Gradual to Instantaneous	Contained by secondary containment
Tank Overfill	> 1 to 9,2000 gallon (truck transport)	Up to 5 gallons per minute	Contained by secondary containment
Leaking pipe or valve packing	Up to 25,000 gallons	Up to 5 gallons per minute	Contained by secondary containment
Tank Truck leak or failure, Frac Tank leak or failure	Up to 9200 gallons	Gradual to Instantaneous	Spill Collection Containers
Hose leaking during truck loading/unloading (Tank Battery A)	Up to several gallons	Up to 5 gallons per minute	Secondary containment on concrete spill ramp.
Pump rupture or failure	Up to several gallons	Up to 5 gallons per minute	Contained by secondary containment

5.0 CONTAINMENT, DIVERSIONARY STRUCTURES OR EQUIPMENT (40 CFR 112.7[C])

Concrete dikes are provided around the AST tanks in each of the separate tank batteries. All concrete secondary containment systems are sufficiently sized to hold the entire volume of the largest tank (25,000-gallons) with proper allowances for precipitation. The system serves to confine any spill inside the facility tank operation areas. The loading and unloading areas for tank trucks are also curbed and engineered to control typical spills. As needed, spilled liquids may be pumped in the treatment systems by vacuum trucks. Typically spilled materials are recovered for processing. Absorbents are managed with other petroleum-contaminated waste streams at the facility.

The vessels are visually inspected daily when in use. Spills will be cleaned up with on-site vacuum units assigned to the Pompano Beach facility. In addition, sorbent materials, and shovels are on the site, if needed. Spill Response Reporting Procedures are presented in Page i of this document.

Truck drivers and/or plant operators are required to attend all material transfers, thus reducing the risk of a release. In the event of a major spill outside the secondary containment system, the truck driver and/or operator would make the necessary notification upon discovery.

FCC Environmental has spill response equipment and personnel stationed at the Pompano Beach Facility that can respond to the spill immediately. The on-duty dispatcher will immediately contact the Facility Manager and local operations personnel to contain the spill. Additional equipment can be summoned from other FCC Environmental facilities or from local emergency response contractors, as needed, including Southern Waste Services, with whom SWS maintains an Oil Spill Response Contract.

Company policy requires that a report detailing remediation procedures and efficiencies be forwarded to the EH&S Department in the event of a spill or release. A sample release report form is shown as Attachment B. The EH&S Department will prepare and submit written reports to state, federal, and local agencies when required.

Spill notification procedures are outlined at the beginning of this Plan. The Deerfield Beach Fire & Rescue will also be notified of any major spill that occurs at the Pompano Beach Facility. The Deerfield Beach Fire & Rescue is familiar with the facility layout in the event of a major spill or fire.

6.0 DEMONSTRATION OF PRACTICABILITY (40 CFR 112.7[D])

Facility management has determined that the use of containment and diversionary structures or readily available equipment to prevent discharged oil from reaching navigable waters is practical and effective at this facility for the fixed storage. Equipment and supplies available to address facility spills is presented in Section XIII.

When the use of temporary storage is required, the facility has determined that the installation of structures or equipment listed in §112.7(c) to prevent discharged oil from reaching the navigable waters is not always practicable given the frequency and length of time the use occurs. Spill kits and vacuum trucks are present at the facility for oil removal. Consequently, the facility has developed a strong oil spill contingency plan. FCC Environmental maintains a current Combined Contingency Plan for its operations that include a designated Spill Response Team, spill response procedures, and well-defined and specific actions to be taken after discovery and notification of an oil discharge. FCC Environmental maintains ongoing contracts with several oil spill response organizations capable of expeditiously mobilizing all necessary manpower, equipment and materials required to control and remove any harmful quantity of oil discharged.

7.0 FACILITY DRAINAGE (40 CFR 112.8[B])

Drainage from the facility's fixed tank operations area is completely confined by concrete containment structures to prevent a spill or other leakage of oil from entering the site drainage system. The containment areas do not have outlets or valves for drainage. In addition, the solid waste handling area at the east end of the facility is diked to contain spills and contact storm water. On-site vacuum units or sump pumps are utilized to clear containment areas of accumulated storm water. All contact storm water is managed as an industrial oil/water or fuel/water mixture.

There are some engineered controls to retain or return any spilled oil to the facility within the tank farm loading/unloading area. The loading/unloading area is slightly declined to a trench drain that is then pumped into the tank farm. Spills that occur outside the containment will be cleaned up with on-site vacuum units assigned to the Pompano Beach facility. In addition, sorbent materials, and shovels are on the site, if needed (40 CFR 112.7(c)). Spill Response Procedures are presented in Page i of this document.

Natural drainage at the facility is divided into three Drainage Basins. Drainage Basin No. 1 includes employee parking areas and the buildings at the North end of the facility. A series of catch basins and culverts directs stormwater to exfiltration trenches for stormwater quality treatment. Drainage Basin No. 2 includes the western end of the facility, outside of the tank farm containment area. Stormwater is directed to a 2000 gallon oil/sand/water interceptor, then to an 1800 cubic ft dry retention area. Drainage Basin No. 3 includes south central parking and yard areas outside of containment areas. Stormwater from Drainage Basin No. 3 flows to two (2) catch basins and exfiltration trenches. Emergency valves on the discharge of the catch basins can be closed in an emergency to contain spills to the concrete-paved yard area until cleanup is completed.

If a worst-case discharge were to occur, it is predicted that much of the oil would be contained onsite or in retention areas. When discovered, oil discharges are promptly collected, contained, and/or pumped into on-site tanks. A log will be kept at the facility documenting spills that occur outside the secondary containment area and clean up procedures that are implemented.

8.0 BULK STORAGE TANKS (40 CFR 112.8.[C])

Each aboveground storage tank is of steel construction and is compatible with the oils they contain and conditions of storage. There are internal heating coils present in the two oil processing tanks at the Pompano Beach Facility (Tanks #3 and #19), and tanks are equipped with high level alarm (indicator lights). By policy and practice, operations measures tank usage (inventory) routinely. Venting capacity is suitable for the fill and withdrawal rates.

All aboveground tanks are surrounded by a concrete containment system that provides secondary containment with a volume greater than 110 percent of the largest single tank, plus sufficient freeboard to accommodate accumulated storm water. Contact storm water is not released to open waterways. It is managed as an industrial oil/water or fuel/water mixture and pumped to the appropriate tank. There are no underground or partially buried storage tanks at the Pompano Beach Facility.

In accordance with 40 CFR 112, all aboveground tanks are periodically inspected to ensure integrity. Aboveground tanks, tank supports, and foundations are inspected in conjunction with a monthly facility inspection program. Operations personnel conduct a visual inspection of the facility and complete a checklist. A copy of monthly facility inspection report is included in Attachment C of this Plan.

All oil containing bulk storage containers shall be integrity tested per API Standard 653 or other applicable industry standards. No facility effluent discharges to open waterways. Leaks that result in a loss of oil from tank seams, gaskets, rivets, and bolts are promptly corrected.

9.0 TRANSFER OPERATIONS, PUMPING, AND IN-PLANT PROCESSES (40 CFR 112.8[D])

All pipelines and valves are examined monthly to assess their condition. Aboveground piping is pressured tested and non-destructive testing is conducted on the tanks as warranted by facility engineers.

All transfer operations are conducted in accordance with Department of Transportation (DOT) procedures (49 CFR 177.834). Warning signs are posted at facility entrances and other locations as needed to prevent vehicles from damaging aboveground pipelines. Signs are also provided near loading and unloading areas to warn drivers to make sure that hoses are disconnected and capped as appropriate prior to exiting the area.

All pipe supports are designed to minimize abrasion and corrosion and to allow for expansion and contraction.

No buried piping is utilized at the Pompano Beach Facility.

10.0 TANK CAR AND TRUCK LOADING/UNLOADING RACK (40 CFR 112.7[H])

The transfer of petroleum products between tank truck and the bulk tank is considered an oil transfer operation. Such operations shall be conducted in accordance with appropriate U.S. Department of Transportation provisions (**49 CFR 177.834**) as follows:

1. Prior to commencement of loading or unloading from a tank truck/railcar:
    a. By the way of a physical barrier system **(per 112.7(e)(4)(iii))**, the cargo tank wheels shall be securely choked to prevent vehicular departures before complete disconnect of lines; and,
    b. If the vehicle cab remains attached, the vehicle handbrake shall be securely set.

2. A cargo tank must be attended at all times during the loading or unloading transfer process. The attendee shall be a contractor or Siemens employee familiar with tank truck/railcar loading and unloading procedures.

3. Due to the bulk storage tanks not having high liquid level alarms, high liquid level pump cutoff devices, or a fast response system (i.e. digital computers, telepulse, or direct vision gauges) for determining liquid levels, direct audible or code signal communications must be used between the tank gauges and the tank truck personnel during each bulk transfer operation.

4. During the loading or unloading transfer process, the cargo tank attendee must:
    a. Be alert;
    b. Have an unobstructed view of the cargo tank;
    c. Be within 25 feet of the cargo tank; and
    d. Be familiar with procedures to be followed in an emergency.

5. Upon completion of the loading or unloading transfer process, the tank truck/railcar attendee shall ensure that:
    a. All manhole closures on the truck/railcar are closed and secured; and
    b. All valves and other closures in liquid discharge systems are closed and free of leaks.

6. Prior to departure of any tank truck/railcar, the lowest drain and all outlets of such vehicle shall be closely examined for leakage; and, if necessary, tightened, adjusted, or replaced to prevent liquid spillage while in transit.

11.0 INSPECTION AND RECORDS (40 CFR 112.7[E])

In practice and policy, operations personnel on a monthly basis conduct a facility-wide inspection. These inspections include all aboveground tanks and appurtenances. A copy of the monthly checklist is provided in Attachment C. Once completed, the inspection reports are signed by the inspector and the facility manager and are maintained in the office for three years.

In addition to the monthly facility inspections, undocumented daily visual inspections are conducted. These inspections consist of a complete walk through of the facility property to check

for tank damage or leakage, stained or discolored soils, and excessive accumulation of water in containment areas.

12.0 SECURITY (40 CFR 112.7[G])

The facility is secured by steel fencing or concrete security wall on all sides. Entrance gates are locked when the facility is unattended. Typical facility operations are from 7:00 AM to 6:00 PM Monday through Friday; however, the facility may be in operation 24 hours a day for unusual events.

Drain valves are locked and always kept in closed position when facility is unattended.

Oil pumping equipment starter controls are maintained in the "off" position when the facility is unattended. Access valves are locked to prevent unauthorized access to the tanks.

Loading and unloading connections of oil pipelines are capped when not in service or when in standby service for an extended period of time.

Area lighting is located to illuminate the office and storage areas. Consideration was given to providing the ability to discover spills at night and prevent spills occurring through vandalism.

At the facility, visitors check in with the on-duty dispatcher and are required to sign in and review general safety guidelines, as well as emergency and spill control procedures.

13.0 PERSONNEL, TRAINING, AND SPILL PREVENTION PROCEDURES (40 CFR 112.7[F])

Pompano Beach Facility personnel have been instructed by management in the operation and maintenance of oil pollution prevention equipment and pollution control laws and regulations. The Pompano Beach Facility Manager is accountable for oil spill prevention at the facility. The Facility Manager is responsible for ensuring the SPCC plan is implemented and that this plan is maintained and kept up to date.

Management provides spill prevention briefings for all oil-handling operations personnel to ensure adequate understanding of the SPCC Plan at least annually. These briefings highlight any past spill events or failures and recently developed precautionary measures. Training has been held on spill prevention, containment, and retrieval methods. Records of spill briefings and training are kept at the Facility and in employee personnel files. Instructions and phone numbers regarding the reporting of a spill to the NRC and FDEP are listed in the Spill Response Procedures on Page iii of this document and have been posted in the office.

Spill prevention equipment maintained onsite for facility operations include:

- Vacuum Truck #54 (3500-gallons single compartment), approx 80-gpm pumping rate (varies with fluid viscosity, hose length),

- Vacuum Truck #55 (3000-gal rear compartment, 1100-gal front compartment), approx 80-gpm pumping rate (varies with fluid viscosity, hose length),
- 100 – 16” x 18”, oil-only absorbent pads, 0.2 gal per pad,
- 50 feet of 5” absorbent boom, oil-only, 0.80 gal/ft,
- 300 lbs. of dry absorbent, clay “litter” type, 0.4 gal per pound,
- 50 - fifty-five gallon waste containers (drums),
- 6 overpack drums, 65-gal size,
- miscellaneous shovels, squeegees and brooms.

Summary of oil retaining capacity of Spill Prevention Equipment maintained on-site:

Item	Capacity (gallons)
Vac Truck #54	3500
Vac Truck #55	4100
Absorbent Pads	20
Absorbent Boom	40
Dry Absorbent	120
Drums	2750

Additional inventory of equipment and supplies is normally available onsite in support of FCC Environmental’s Field Services operations.

14.0 MANAGEMENT APPROVAL AND ENGINEER'S CERTIFICATION (40 CFR 112.3[D])

Management Approval

I hereby certify that the information provided in this document is to the best of my knowledge true and accurate. The SPCC Plan is fully approved by the management of FCC Environmental, LLC and will be implemented as described (40 CFR 112.7). A copy of this plan will be maintained at the facility and a second copy with the authorized facility response coordinator.

Bernie Korzekwinski, Branch Manager

8/24/12

Date

Engineering Certification

I hereby certify that I or my representative has examined the facility, and being familiar with the provisions of 40 CFR Part 112, attest that this Spill Prevention, Control, and Countermeasure (SPCC) plan has been prepared in accordance with good engineering practice in accordance with the requirements of 40 CFR Part 112, the procedures for required inspection and testing have been established, and this Plan is adequate for the facility consideration of applicable standards.

Scott S. Crandall P.E.

8/20/12

Date

Registration Number: 44650, State: Florida

15.0 SPCC PLAN REVIEW (40 CFR 112.5[B])

15.1 Amendment of SPCC Plan by Regional Administrator [40 CFR 112.4]

A written report shall be submitted to the USEPA Administrator – Region IV within 60 days of a discharge of more than 1,000 gallons of oil into or upon the navigable waters of the United States or adjoining shorelines in a single spill event, or discharges of 42 gallons of oil into or upon the navigable waters of the United States or adjoining shorelines in two spill events occurring within any twelve month period. The USEPA may require amendment of the SPCC Plan as a result of the written report submitted pursuant to this paragraph.

The information required in the subject written report, and the potential actions, which may result, as described in [40 CFR 112.4], are in Section 4.14 Spill Reporting Requirements of this Plan.

15.2 Amendment of SPCC by Owner/Operator [40 CFR 112.5(a)]

This SPCC Plan shall be amended by FCC Environmental, LLC whenever there is a change in facility design, construction, operation, or maintenance, which materially affects the facility's potential for a discharge of oil upon the navigable waters of the United States or adjoining shorelines. Examples of changes that may require amendment of the Plan include, but are limited to: installation, removal, replacement, reconstruction, or movement of oil containing equipment. Such amendments made under this section must be prepared within six months and be fully implemented as soon as possible, but not later than six months after such changes occur. A certified Professional Engineer must certify any technical amendment to this Plan in accordance with [40 CFR 112.3(d)].

Any such change shall be noted on the Review and Amendment Log (Attachment E) of the SPCC Plan. Entries made in the Review and Amendment Log will include the following information:

- The date of the change at the facility;
- A general description of those changes requiring amendment of the existing SPCC Plan (an additional description of changes can be inserted as an attachment to the log, if necessary);
- A listing of those pages of the SPCC Plan which were modified and/or affected;
- The signature of the person responsible for amending the plan; and,
- A notation as to whether the changes were significant enough to warrant re-certification by a Professional Engineer.

Any pages of the existing SPCC Plan that require revision will be noted on the Review and Amendment Log (Attachment E) with the date of the change. The revisions documented on the Review and Amendment Log (Attachment E) will supersede those SPCC Plan pages noted in the Review and Amendment Log (Attachment E) .

15.3 Plan Review [40 CFR 112.5(b)]

The SPCC Plan shall be reviewed and evaluated for its consistency with the facility's operations and discharge potential at least once every five years. Completion of this review will be noted with an entry in the SPCC Plan Review and Amendment Log (Attachment E). If, as a result of this review, it is determined that this SPCC Plan accurately reflects the current (as of the time of the review) facility operations, spill potential, and spill response and prevention measures, then the entry made in the SPCC Plan Review and Amendment Log shall indicate that no changes were made. This entry will include the signature of the SPCC Plan reviewer.

15.4 Technical Amendment Certification [40 CFR 112.5(c)]

Amendments made to the SPCC Plan as a result of any technical amendments to the Plan, such as a change in facility design, construction, operation, or maintenance that materially affects the facility's potential for a discharge of oil, require certification of the SPCC Plan by a Professional Engineer. This certification must include signature and seal of a Professional Engineer and must be duly noted in the Review and Amendment Log. The new certification page must then be inserted into the SPCC Plan.

Minor changes, such as name changes of facility personnel or general facility information, do not require certification of the SPCC Plan by a Professional Engineer. However, these must still be noted in the Review and Amendment Log.

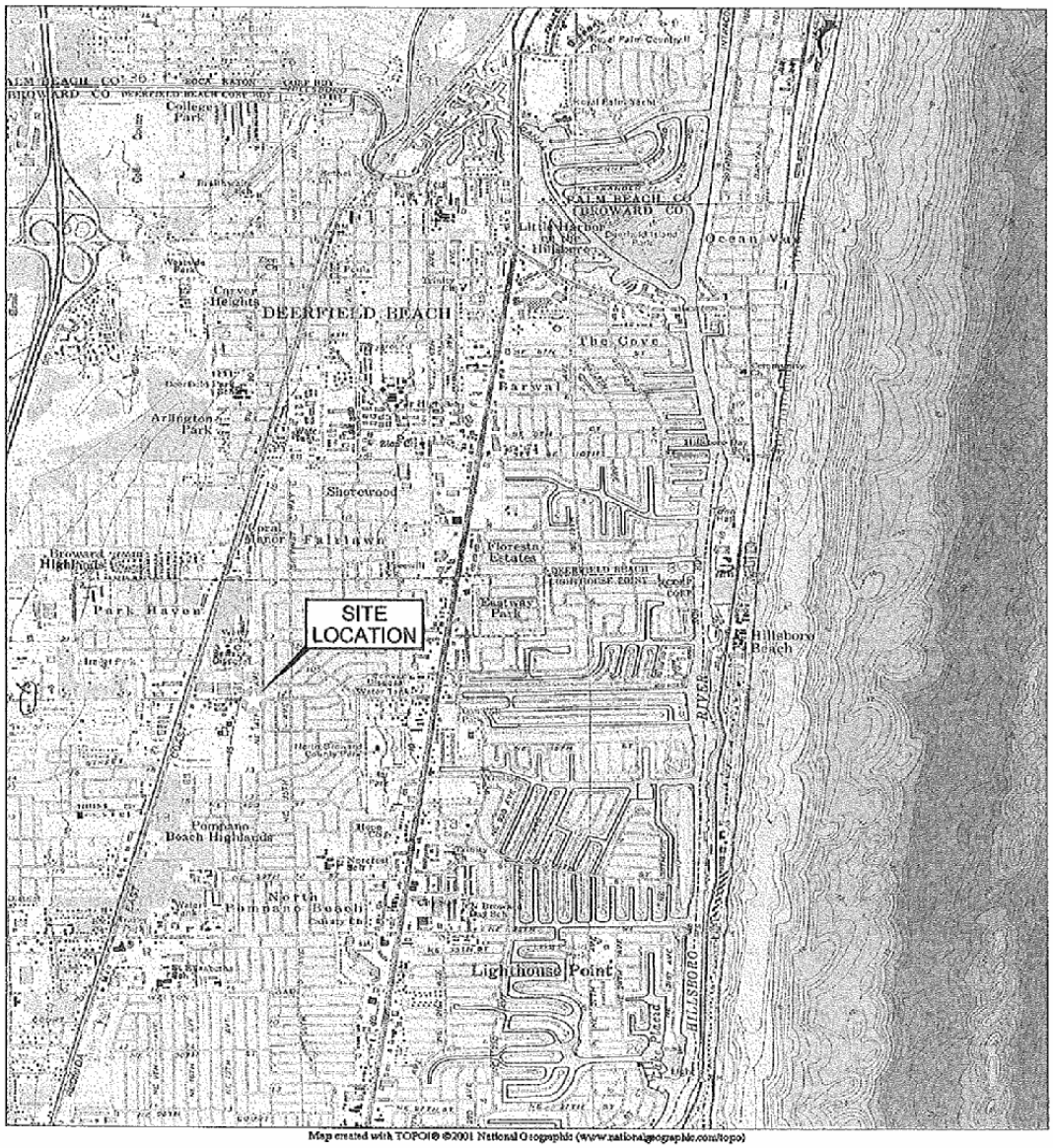
16.0 LIMITATIONS

This plan and all supporting data and notes (collectively referred to hereinafter as "information") were gathered and/or prepared in accordance with generally accepted engineering and scientific practices in effect at the time of the assessment of the site. The information described herein is derived from oral information provided by the facility representatives, physical observations, and ENSR's interpretation of applicable regulations. ENSR shall not be held responsible for conditions or consequences arising from relevant facts that were concealed, withheld, or not fully disclosed by facility or site representatives at the time this plan was prepared. This plan was solely prepared or collected for FCC Environmental. FCC Environmental may release the information to other third parties, who may use and rely upon the information at their discretion. However, any use of or reliance upon the information by a party other than specifically named above shall be solely at the risk of such third party and without legal recourse against ENSR, its parent company, or its subsidiaries and affiliates, or their respective employees, officers or directors, regardless of whether the action in which recovery of damages is sought is based upon contract, tort (including the sole, concurrent or other negligence and strict liability of ENSR), statute, or otherwise. This information shall not be used or relied upon by a party that does not agree to be bound by the above statement.

FIGURES

FIGURE #1

VICINITY MAP
FCC ENVIRONMENTAL, LLC
POMPANO BEACH, FLORIDA

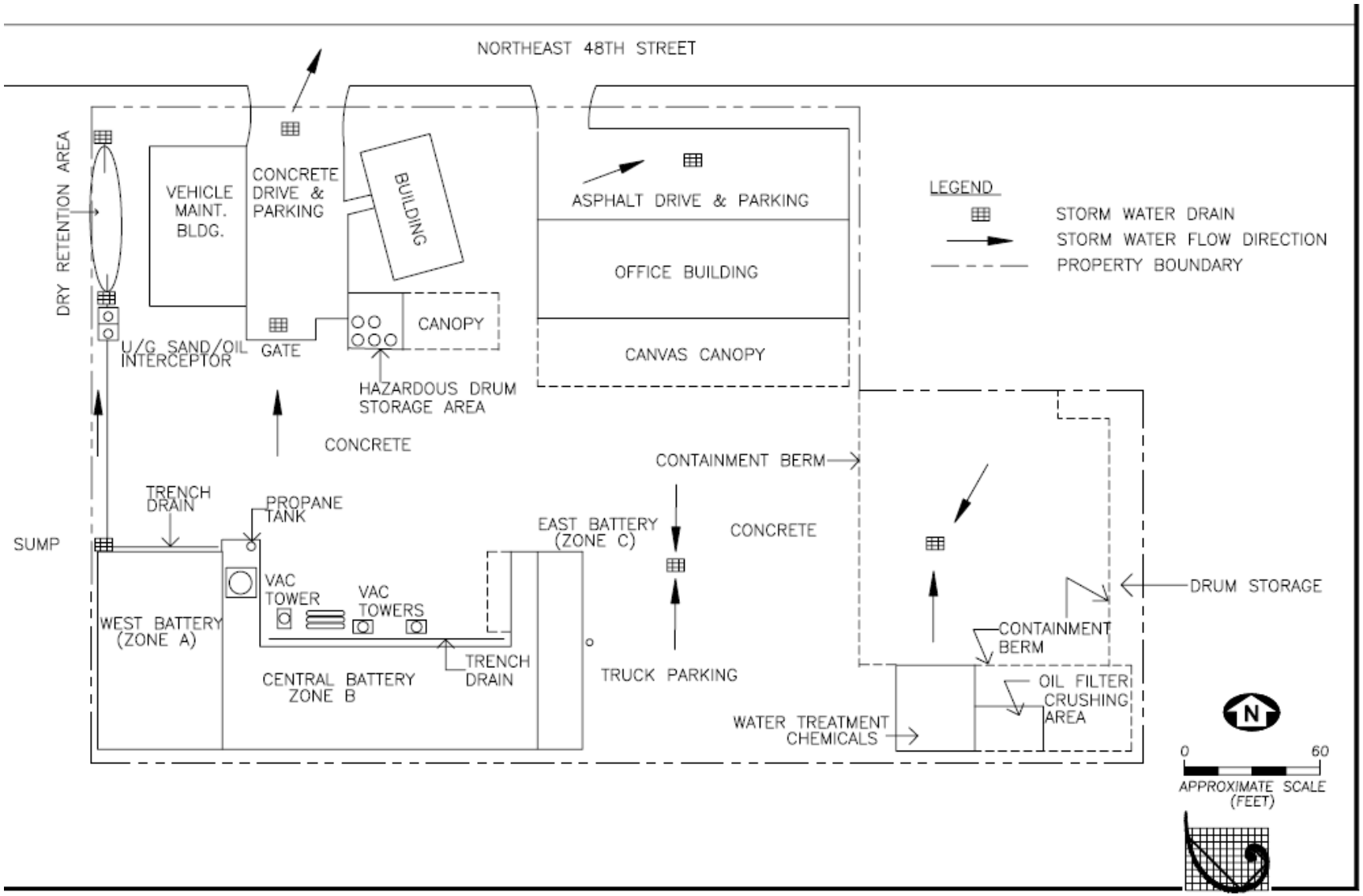


	Spill Prevention Control and Countermeasure Plan (SPCC) USGS Quadrangle: Boca Raton, Florida SCALE: 1:24,000	**Site Location Map** Pompano Beach Facility 1280 Northeast 48th Street Pompano Beach, Florida, 33064 April 2003 Job No. 06953-024-100	Figure 1 ENSR INTERNATIONAL

FIGURE #2

SITE PLAN AND DRAINAGE MAP

FCC ENVIRONMENTAL, LLC
POMPANO BEACH, FLORIDA


NORTHEAST 48TH STREET
DRY RETENTION AREA
VEHICLE MAINT. BLDG.
CONCRETE DRIVE & PARKING
BUILDING
ASPHALT DRIVE & PARKING
OFFICE BUILDING
CANVAS CANOPY
CANOPY
U/G SAND/OIL INTERCEPTOR
GATE
HAZARDOUS DRUM STORAGE AREA
CONCRETE
CONTAINMENT BERM
TRENCH DRAIN
PROPANE TANK
SUMP
EAST BATTERY (ZONE C)
CONCRETE
VAC TOWER
VAC TOWERS
WEST BATTERY (ZONE A)
CENTRAL BATTERY ZONE B
TRENCH DRAIN
TRUCK PARKING
DRUM STORAGE
CONTAINMENT BERM
OIL FILTER CRUSHING AREA
WATER TREATMENT CHEMICALS
LEGEND
STORM WATER DRAIN
STORM WATER FLOW DIRECTION
PROPERTY BOUNDARY
N
0
60
APPROXIMATE SCALE (FEET)

ATTACHMENT A

CERTIFICATION OF THE APPLICABILITY OF SUBSTANTIAL HARM CRITERIA

FCC ENVIRONMENTAL, LLC
POMPANO BEACH, FLORIDA

Attachment A
Certification of the Applicability of the Substantial Harm Criteria
(40 CFR 112.2)

FCC Environmental, LLC
Pompano Beach, Florida

1. Does the facility transfer oil over water to or from vessels and does the facility have a total oil storage capacity greater than or equal to 42,000 gallons?

   Yes [ ] No [X]

2. Does the facility have a total oil storage capacity greater than or equal to 1 million gallons and does the facility lack secondary containment that is sufficiently large to contain the capacity of the largest aboveground oil storage tank plus sufficient freeboard to allow for precipitation within any aboveground oil storage tank area?

   Yes [ ] No [X]

3. Does the facility have a total oil storage capacity greater than or equal to 1 million gallons and is the facility located at a distance (as calculated using the appropriate formula in Attachment C-III to this appendix or a comparable formula ^1) such that a discharge from the facility could cause injury to fish and wildlife and sensitive environments? For further description of fish and wildlife and sensitive environments, see Appendices I, II, and III to DOC/NOAAs "Guidance for Facility and Vessel Response Plans: Fish and Wildlife and Sensitive Environments" (see Appendix E to this part, section 10, for availability) and the applicable Area Contingency Plan.

   Yes [ ] No [X]

3. Does the facility have a total oil storage capacity greater than or equal to 1 million gallons and is the facility located at a distance (as calculated using the appropriate formula in Attachment C-III to this appendix or a comparable formula) such that a discharge from the facility would shut down a public drinking water intake?

   No. 1 - If a comparative formula is used, documentation of the reliability and analytical soundness of the comparable formula must be attached to this form.

   No. 2 - For the purposes of 40 CFR part 112, public drinking water intakes are analogous to public water systems as described at 40 CFR 143.2(c).

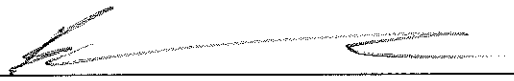
   Yes [ ] No [X]

4. Does the facility have a total oil storage capacity greater than or equal to 1 million gallons and has the facility experienced a reportable oil spill in an amount greater than or equal to 10,000 gallons within the last 5 years?

   Yes [ ] No [X]

Certification:

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this document, and that based on my inquiry of those individuals responsible for obtaining this information, I believe that the submitted information is true, accurate, and complete.

Signature: 

Name Bernie Korzekwinski
(Please type or print)

Title: Branch Manager, Pompano Beach Florida Facility

Date: 5/4/12

ATTACHMENT B

RELEASE REPORTING FORM

FCC ENVIRONMENTAL, LLC
POMPANO BEACH, FLORIDA

ATTACHMENT B
RELEASE REPORTING FORM
FCC ENVIRONMENTAL, LLC POMPANO BEACH, FLORIDA

RECORD OF SPILLS					Completed by:_____ Date:_____	
Instructions:	**Record all *SPILLS* and *SPILL EVENTS* (as defined in 40 CFR 112.2) of oil that have occurred at the facility since the effective date of this SPCC Plan.**					
Date	**Location**	**Description**			**Response Procedures**	
		Type of Material	**Quantity (units)**	**Source/Reason**	**Amount of Material Recovered (units)**	**Preventive Measures Taken (include date measures taken)**

ATTACHMENT C

MONTHLY FACILITY INSPECTION REPORT

FCC ENVIRONMENTAL, LLC
POMPANO BEACH, FLORIDA

ATTACHMENT C
MONTHLY FACILITY INSPECTION REPORT

FCC ENVIRONMENTAL, LLC
POMPANO BEACH, FLORIDA

Instructions:
An SPCC Plan Site Inspection shall be conducted annually. This record of the inspection shall be maintained at Responsible Service Center with the SPCC Plan for at least 5 years.

1. Facility:_____

2. Date of Inspection:_____

3. Any unrecorded changes to facility? Yes____ No___

   See SPCC Plan for definition of "unrecorded changes." If "yes," describe below and give recommendations, if any.

   _____

   _____

   _____

4. Adequate Inventory of Spill Cleanup Materials? Yes____ No____

5. Adequate condition of oil absorbent barriers, berms, and/or other SPCC measures? Yes____ No____

   If "no" (e.g., clogging with sediment, plugging, deterioration, etc.), identify below and give recommendation: _____

   _____

6. Any evidence of leakage or spills? Yes____ No____
   If "yes," describe below and give recommendations.

   _____

   _____

   _____

7. _____ 8. _____
   Name of Inspector (print) Signature

ATTACHMENT D

SPCC PLAN REVIEW AND AMENDMENT LOG

FCC ENVIRONMENTAL, LLC
POMPANO BEACH, FLORIDA

ATTACHMENT D

SPCC PLAN REVIEW AND AMENDMENT LOG

FCC ENVIRONMENTAL, LLC
POMPANO BEACH, FLORIDA

DATE	PURPOSE			LOCATION	P.E. RECERTIFICATION
	REVIEW	AMENDMENT	MODIFICATION		
9/17/07	√	√	√	ALL PAGES	YES
12/20/07			√	2 (Address Change)	
10/25/08	√	√	√	5 year review. All pages – company name change, Page iii – contact updates Page 11 – updated drainage description Page 15 – updated spill control equipment inventory and spec Att. A - recertification	√
08/15/12	√	√	√	5 year review. All pages – company name change, Page iii – contact updates Att. A – recertification Tank Schedule update	YES

FCC ENVIRONMENTAL, LLC
POMPANO BEACH, FLORIDA
ATTACHMENT 7
UNIT MANAGEMENT PLAN

USED OIL

Used oil and mixtures containing used oil are only stored in above ground steel tanks and DOT approved containers. All used oil storage and process tanks and containers are maintained in good condition with no severe rust, apparent structural or deterioration and are not visibly leaking.

Container and storage tanks that store used oil are labeled "Used Oil". Tanks that store used oil, or may contain mixtures containing used oil, at FCC Environmental, LLC are summarized in a table listing the storage tank volumes, material stored, and installation dates is included in this attachment.

All used oil containers are stored with adequate aisle space in secondary containment 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. Oily waste drums are managed within the drum handling area. This area is underlain with concrete. At least weekly, FCC Environmental, LLC personnel visually inspect areas where containers are stored, looking for leaking containers and for deterioration of containers. If any container holding waste is not in good condition (e.g., if severe rusting or structural defects are apparent) or if it begins to leak, FCC Environmental, LLC personnel will transfer the waste from this container to another container that is in good condition or over-pack to prevent release.

All used oil storage tanks meet the conditions for existing aboveground tanks in 40 CFR 279.54(d) and 62-762 F.A.C. The secondary containment for these tanks includes retaining walls of concrete block and reinforced concrete. The entire area inside the retaining walls is underlain with concrete, free of cracks, and which is sufficiently impervious to used oil to prevent any release of used oil in the containment system from migrating to the soil, groundwater, or surface water. The containment areas have also been sealed with epoxy. In addition, the facility was constructed atop a liner.

All aboveground used oil process and storage tanks are properly labeled with the words "Used Oil." All tanks at FCC Environmental, LLC are steel aboveground storage tanks. 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.

The facility contains four tank batteries: West, Central and East and Water Plant. The storage tanks and piping are constructed of steel, and located within the secondary containment area. The secondary containment system has sufficient capacity plus freeboard, greater than 110 percent of the volume of the largest container. The volume calculations are presented in the attached Spill Prevention, Control and Countermeasure (SPCC) Plan.

Impacted stormwater (displaying signs of petroleum) that enters the secondary containment area is pumped (within 24 hours of discovery) into the on-site storage tanks for eventual on-site treatment. As allowed under 62-762.701(2)(6)1.a. F.A.C., accumulated stormwater will be drawn off within one-week after a rainfall event. A description of the drainage facilities at the Pompano Beach facility is presented as Section 7 of the SPCC Plan.

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

In the event that any component of FCC Environmental, LLC's storage tank system is discovered to have discharged or contributed to the discharge of a pollutant, facility 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 damaged 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 F.A.C.. 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. FCC Environmental, LLC records repairs to the storage tank system, excluding routine maintenance.

Table 7.1 – Summary of Aboveground Storage Tanks
FCC Environmental, LLC – Pompano Beach Facility
Pompano Beach, Florida

Tank ID Number	Volume (Gallons)	Primary Material Stored	Alternate Material(s) Stored*	Construction Date
West Tank Battery (Zone A)				
18	12,000	Used Oil	Diesel	6/1/93
19	25,000	Used Oil	Oil – Spec Fuel	6/1/93
22	20,000	Used Oil	Oil – Spec Fuel	6/1/99
23	20,000	Used Oil	Oil – Spec Fuel	6/1/99
24	20,000	Used Oil	Oil – Spec Fuel	6/1/99
25	20,000	Used Oil	Oil – Spec Fuel	6/1/99
26	20,000	Used Oil	Oil – Spec Fuel	6/1/99
27	20,000	Used Oil	Oil – Spec Fuel	6/1/99
Central Tank Battery (Zone B)				
1	25,000	Treated Water		11/1/2003
2	25,000	Process Waste Water	Oily Water	6/1/93
3	25,000	Oily Water		6/1/93
4	10,000	PCW	Oily Water	6/1/93
5	10,000	PCW	Antifreeze	6/1/93
6	10,000	PCW	Oily Water	6/1/93
7	10,000	Antifreeze	Oily Water	6/1/93
8	10,000	Used Oil	Oily Water	6/1/93
9	10,000	Used Oil	PCW	6/1/93
10	10,000	Used Oil	Oily Water	6/1/93
11	10,000	Used Oil	Oily Water	6/1/93
12	10,000	Used Oil	Oily Water	6/1/93
13	10,000	Used Oil	Oil – Spec Fuel	6/1/93
14	10,000	Used Oil	Oil – Spec Fuel	6/1/93
15	10,000	Used Oil	Oil – Spec Fuel	6/1/93
16	25,000	Used Oil	Oil – Spec Fuel	6/1/93
17	25,000	Used Oil	Oil – Spec Fuel	6/1/93
23D	1,500	Diesel		6/1/96
22PCW	3,000	PCW		6/1/94
East Tank Battery (Zone C)				
20	15,000	Oily Water	Oily Water	6/1/94
21	15,000	Diesel	Oily Water	6/1/94
Wastewater Treatment Area (Zone D)				
30	30,000	Process Waste Water		2008
31	30,000	Process Waste Water		2008

*Tank may be cleaned and used to alternate materials as needed. Tank labeling is changed when materials stored are changed.

USED OIL FILTERS

Used Oil Filters are managed in DOT approved containers and kept closed and stored inside the warehouse protecting them from inclement weather. Containers storing used oil filters are marked "Used Oil Filters".

INDUSTRIAL WATERS

The same inspection program and management standards for containers and tanks as described in the Used Oil section of this Attachment are applicable for the industrial water manifested to the facility.

PETROLEUM CONTACT WATERS

The same inspection program and management standards for containers and tanks as described in the Used Oil section of this Attachment are applicable for petroleum contact waters manifest to the facility.

OILY WASTE

The same inspection program and management standards for containers and tanks as described in the Used Oil/Used Oil Filter section of this Attachment are applicable for oily waste manifest to and from the facility.

HAZARDOUS WASTE

Hazardous waste containers are placed in accordance with the 50-foot setback rule and with adequate 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. At least weekly, FCC Environmental, LLC personnel visually inspect areas where containers are stored, looking for leaking containers and for deterioration of containers. If any container holding waste is not in good condition (e.g., if severe rusting or structural defects are apparent) or if it begins to leak, facility personnel will transfer the waste from this container to another container that is in good condition or over-pack to prevent release.

FCC ENVIRONMENTAL, LLC
POMPANO BEACH, FLORIDA
ATTACHMENT 8
CLOSURE PLAN

The FCC Environmental, LLC Pompano Beach facility located at 1280 Northeast 48th Street 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). Solid waste operations are limited to the container storage areas. As requested by the Florida Department of Environmental Protection (FDEP), an overall facility Closure Cost Estimate, for which financial assurance is required, is presented.

The Closure Plan is based upon a scheduled and orderly shutdown of the facility. FCC Environmental, LLC 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, FCC Environmental, LLC 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, FCC Environmental, LLC will comply with the requirements of 40 CFR, Part 279.54(h) and Chapter 62-710, F.A.C. 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 62-762.801(3) and (4), F.A.C and FDEP's *Storage Tank System Closure Assessment Requirements* guideline.

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 Final Closure of the FCC Environmental, LLC Fort Pierce facility may require characterization of soil and groundwater quality conditions. The relevant Clean-up Target Levels for soil and groundwater, if required are contained in F.A.C. Rule 62-777. Petroleum Product Contaminants of Concern are defined in F.A.C. Rule 62-770 Table A. Sampling and analytical protocols will be in accordance with U.S. EPA SW-846 Methods and will include the Florida Petroleum Residual Organic Method for Total Recoverable Petroleum Hydrocarbons. In general, disposal analyses will be required for Florida pre-burn constituents. Metals will be analyzed by Method 6010 or Graphite Furnace Method 7470 for mercury; volatile and semi-volatile organics will be analyzed by Methods 8260/8270. The laboratory will use other U.S. EPA-approved methods appropriate to the sample matrix and analytical requirements

CLOSURE OF TANK STORAGE

Maximum tank storage is 496,500 gallons (including 13,500 gallons of vehicular diesel; 60,000 gallons future oily water storage tanks; 358,000 used oil/spec oil/oily water/PCW; 25,000 gallons treated water; 40,000 gallons process/water plant feed water). A list of the storage tanks that could contain petroleum-related substances at the Pompano Beach location is presented in Table 8.1.

Table 8.1 – Summary of Aboveground Storage Tanks
FCC Environmental, LLC – Pompano Beach Facility
Pompano Beach, Florida

Tank ID Number	Volume (Gallons)	Primary Material Stored	Alternate Material(s) Stored*	Construction Date
West Tank Battery (Zone A)				
18	12,000	Used Oil	Diesel	6/1/93
19	25,000	Used Oil	Oil – Spec Fuel	6/1/93
22	20,000	Used Oil	Oil – Spec Fuel	6/1/99
23	20,000	Used Oil	Oil – Spec Fuel	6/1/99
24	20,000	Used Oil	Oil – Spec Fuel	6/1/99
25	20,000	Used Oil	Oil – Spec Fuel	6/1/99
26	20,000	Used Oil	Oil – Spec Fuel	6/1/99
27	20,000	Used Oil	Oil – Spec Fuel	6/1/99
Central Tank Battery (Zone B)				
1	25,000	Treated Water		11/1/2003
2	25,000	Process Waste Water	Oily Water	6/1/93
3	25,000	Oily Water		6/1/93
4	10,000	PCW	Oily Water	6/1/93
5	10,000	PCW	Antifreeze	6/1/93
6	10,000	PCW	Oily Water	6/1/93
7	10,000	Antifreeze	Oily Water	6/1/93
8	10,000	Used Oil	Oily Water	6/1/93
9	10,000	Used Oil	PCW	6/1/93
10	10,000	Used Oil	Oily Water	6/1/93
11	10,000	Used Oil	Oily Water	6/1/93
12	10,000	Used Oil	Oily Water	6/1/93
13	10,000	Used Oil	Oil – Spec Fuel	6/1/93
14	10,000	Used Oil	Oil – Spec Fuel	6/1/93
15	10,000	Used Oil	Oil – Spec Fuel	6/1/93
16	25,000	Used Oil	Oil – Spec Fuel	6/1/93
17	25,000	Used Oil	Oil – Spec Fuel	6/1/93
23D	1,500	Diesel		6/1/96
22PCW	3,000	PCW		6/1/94
East Tank Battery (Zone C)				
20	15,000	Oily Water	Oily Water	6/1/94
21	15,000	Diesel	Oily Water	6/1/94
Wastewater Treatment Area (Zone D)				
30	30,000	Process Waste Water		2008
31	30,000	Process Waste Water		2008

*Tank may be cleaned and used to alternate materials as needed. Tank labeling is changed when materials stored are changed.

Upon closure, all tanks will be emptied. Any inventory that meets 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/or chemical analysis for TCLP

constituents. Upon closure of the tank system in accordance with 40 CFR Part 279, FCC Environmental, LLC will remove or decontaminate used oil residues in tanks, contaminated secondary containment system components, contaminated soils, structures, and equipment. FCC Environmental, LLC 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.

As part of an orderly shutdown procedure, oily water will be sent to a sister FCC Environmental, LLC facility for processing 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.

CLOSURE OF CONTAINER STORAGE AREA

Maximum container storage:

non-hazardous drums:	**1000**
hazardous drums:	**60**
30-yard roll-off boxes:	**0**
20-yard roll-off boxes	**5**

Upon closure, containers 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. All materials used in the decontamination will be either sent and processed through a FCC Environmental, LLC facility wastewater treatment system, or shipped off site to a proper disposal facility.

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 762.801(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 reconnaissance Closure Assessment investigative procedure is based on near surface soil sampling and field screening with a FID to determine the presence of hydrocarbons if any. Groundwater sampling will be performed in areas where soil shows evidence of petroleum hydrocarbons. Soil sampling will be accomplished by either grab samples from Geoprobe liners or samples from hand auger 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- to 2-foot Direct Contact interaction zone. Additional samples will also be collected at other depth intervals based on observed site conditions.

Groundwater status will be determined by installing temporary monitoring wells. 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 F.A.C. Soil and groundwater samples will be tested for the specified constituents using the specified or any proposed alternative analytical methods. At a minimum, constituents defined

within F.A.C. 62-770 Table C will be used as the basis for selecting constituents. The regulations at 40 CFR 279.54(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 F.A.C. 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. For initial estimation purposes, approximately twenty soil samples will be evaluated. The exact number of samples will be determined at the time of closure activities and will be reflective of actual site conditions at that time.

If soil and/or groundwater are determined to be contaminated by the reconnaissance Closure Assessment, it will be necessary to implement a more comprehensive closure plan. Any remaining soil or groundwater contamination will be assessed and remediated in accordance with the requirements of Rule 62-780 F.A.C. Contaminated Site Cleanup Criteria. The closure plan will be modified to incorporate the requirements of Rule 62-780, if necessary, including applicable public notice requirements.

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 FCC Environmental, LLC FDEP 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 facility-wide Closure Cost Estimates have been presented to FDEP, as identified in Table 2, for which there is a financial assurance requirement. The cost estimate utilizes Year 2008 Florida Prevailing Wage Rates with typical Contractor Billing Rate Multipliers, but has been updated utilizing the provided FDEP Inflation Factors. 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. Vertical and horizontal soil sampling around all waste handling areas will be sampled to determine if any contamination exists. Groundwater sampling may be contingent upon the results of soil sampling.

The total current closure Decontamination Cost Estimate for the FCC Environmental, LLC Pompano Beach facility is **$663,591.00**

Print Form

Florida Department of Environmental Protection

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

DEP Form #62-710.901(7)
Form Title Used Oil Facility Financial Assurance Closing Cost Estimate Form
Effective Date June 9, 2005

Used Oil Processing Facility Closing Cost Estimate Form

Date: Jan 12, 2012 Date of DEP Approval: _____

I. GENERAL INFORMATION: Latitude: 26/17/21 Longitude: 80/06/23 EPA ID Number: 984 262 410

Facility Name: FCC Environmental, LLC Permit Number: 5138 4 HO 004

Facility Address: 1280 NE 48TH St Pompano Beach FL 33064

Mailing Address: SAME

Contact Person's Name: Bernie Korzekwinski Phone Number: 954-785-2320

Email: Bernard.Korzekwinski@fccenvironmental.com Fax Number: 954-783-6913

II. TYPE OF FINANCIAL ASSURANCE DOCUMENT (Check Type)

X Letter of Credit*	____ Performance Bond*	____ Guaranty Bond*	*Indicate mechanisms that require use of a Standby Trust Fund Agreement
____ Insurance Certificate	____ Financial Test	____ Trust Fund Agreement	

III. ESTIMATE ADJUSTMENT: (check and use either box a or b, below)

40 CFR Part 264, Subpart H, as adopted by reference in Rule 62-701.630, Florida Administrative Code, sets forth the method of annual cost estimate adjustment. Cost estimates may be adjusted by using an inflation factor or by recalculating the maximum costs of closing in current dollars. Estimates are due annually between January 1 and March 1. Select one of the methods of cost estimate adjustment below.

☒ **(a) Inflation Factor Adjustment**

Inflation adjustment using an inflation factor may only be made when a Department approved closing cost estimate exists and no changes have occurred in the facility operation which would necessitate modification to the closure plan. The inflation factor is derived from the most recent Implicit Price Deflator for Gross National Product published by the U.S. Department of Commerce in its survey of Current Business. The inflation factor is the result of dividing the latest published annual Deflator by the Deflator for the previous year. The inflation factor may also be obtained from the Solid Waste Financial Coordinator at (850) 245-8732 or be found online at http://www.dep.state.fl.us/waste/categories/swfr/

This adjustment is based on the Department approved closing cost estimate dated: Apr 5, 2011

657,021	x	1.010	=	$663,591
Latest DEP approved Closing Cost Estimate		Current Year Inflation Factor		Inflation Adjusted Annual Closing Cost Estimate

Signature: _____ Phone: 813 335-5341

Name and Title: Scott Crandall Dir EHS E-Mail: scott.crandall@fccenvironmental.com

If you have questions concerning this form, please contact the Used Oil Coordinator at the address below, by phone at (850) 245-8755, or by E-Mail at: Aprilia.Graves@dep.state.fl.us

Please mail this completed cost estimate to:

Used Oil Permit Coordinator
MS4560
FDEP
2600 Blair Stone Road
Tallahassee, FL 32399-2400

Please mail a copy of the cost estimate to:

Solid Waste Financial Coordinator
MS 4565
FDEP
2600 Blair Stone Road
Tallahassee, FL 32399-2400

FCC ENVIRONMENTAL, LLC
POMPANO BEACH, FLORIDA
ATTACHMENT 9
EMPLOYEE TRAINING

A schedule of FCC Environmental, LLC's training is included as part of this attachment. This spreadsheet lists every employee, along with the various types of training they've received. 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 Federal/State Hazardous Waste and Used Oil regulations, Confined Space Entry, Personal Protective Equipment, Respiratory Fit and Usage, Department of Transportation Requirements, HAZCOM training, OSHA 40-hour training and 8-hour annual refresher classes. Written training records including the name of the employee, date and type of training will be kept at the site.

SAFETY TRAINING MATRIX

Facility Name:Pompano	January - Avoiding Turning Collisions	February - Defensive Driving	March - CSA Three point rule	April - Power Industrial Lift Trucks/Fork lift	May - Fires Extinguisher Use/Hot Works	June - Blood Borne Pathogens and EHS Handbook	July - Five Star Driver Training Incident Reporting	August - Fall Prevention, Slips Trips and Falls SPCC Plan	September - CSA Distracted Driving	October -Safety, Incindent Recognition	November - Hazardous Materials Awareness	December - SOP Cell Phone Bans	
Field Services													
Shane Herbold (GAG)	1/22/2011	2/18/2011	3/18/2011	4/29/2011	5/27/2011	6/24/2011	7/16/2011	8/19/2011	9/23/2011	10/21/2011	11/18/2011	12/16/2011	
Edwin DelGado (GAG)	1/22/2011	2/18/2011	3/18/2011	4/29/2011	5/27/2011	6/24/2011	7/16/2011	8/19/2011	9/23/2011	10/21/2011	11/18/2011	12/16/2011	
Alton R. Hummel FLD SVC Supervisor (G	1/22/2011	2/18/2011	3/18/2011	4/29/2011	5/27/2011	6/24/2011	7/16/2011	8/19/2011	9/23/2011	10/21/2011	11/18/2011	12/16/2011	
Gary L Smith (GAG)	1/22/2011	2/18/2011	3/18/2011	4/29/2011	5/27/2011	6/24/2011	7/16/2011	8/19/2011	9/23/2011	10/21/2011	11/18/2011	12/16/2011	
Santiago Rodriguez (GAG)	1/22/2011	2/18/2011	3/18/2011	4/29/2011	5/27/2011	6/24/2011	7/16/2011	8/19/2011	9/23/2011	10/21/2011	11/18/2011	12/16/2011	
Bruce Smith (GAG)	1/22/2011	2/18/2011	3/18/2011	4/29/2011	RESIGNED								
Administration													
Bernie Korsekwinski Branch Manager (GA	1/22/2011	2/18/2011	3/18/2011	4/29/2011	5/27/2011	6/24/2011	7/16/2011	8/19/2011	9/23/2011	10/21/2011	11/18/2011	12/16/2011	
Kelli Roberts (GAA)	1/22/2011	2/18/2011	3/18/2011	4/29/2011	5/27/2011	6/24/2011	7/16/2011	8/19/2011	9/23/2011	10/21/2011	11/18/2011	12/16/2011	
Anabel Gray (GAA)	1/22/2011	2/18/2011	3/18/2011	4/29/2011	5/27/2011	6/24/2011	7/16/2011	8/19/2011	9/23/2011	10/21/2011	11/18/2011	12/16/2011	
Adriane Ward (GAA)	1/22/2011	2/18/2011	3/18/2011	4/29/2011	5/27/2011	6/24/2011	7/16/2011	8/19/2011	9/23/2011	10/21/2011	11/18/2011	12/16/2011	
Oil Exchange													
Frank Langella (GAF)	1/22/2011	2/18/2011	3/18/2011	4/29/2011	5/27/2011	6/24/2011	7/16/2011	8/19/2011	9/23/2011	10/21/2011	11/18/2011	12/16/2011	
William Adams (GAF)	1/22/2011	2/18/2011	3/18/2011	4/29/2011	5/27/2011	6/24/2011	7/16/2011	8/19/2011	9/23/2011	10/21/2011	11/18/2011	12/16/2011	
Oil Collections													
Jason Gipe (GAB)	1/22/2011	2/18/2011	3/18/2011	4/29/2011	5/27/2011	6/24/2011	7/16/2011	8/19/2011	9/23/2011	10/21/2011	11/18/2011	12/16/2011	
David Lopez (GAB)			3/18/2011	4/29/2011	5/27/2011	6/24/2011	7/16/2011	8/19/2011	9/23/2011	10/21/2011	11/18/2011	12/16/2011	
Michael Organ (GAB)	1/22/2011	2/18/2011	3/18/2011	4/29/2011	5/27/2011	6/24/2011	7/16/2011	8/19/2011	9/23/2011	10/21/2011	11/18/2011	12/16/2011	
Anthony Fuoco(Trans Manager)	1/22/2011	2/18/2011	3/18/2011	4/29/2011	5/27/2011	6/24/2011	7/16/2011	8/19/2011	9/23/2011	10/21/2011	11/18/2011	12/16/2011	
Filter Collections													
Tchaly Leandre	1/22/2011	2/18/2011	3/18/2011	4/29/2011	5/27/2011	6/24/2011	7/16/2011	8/19/2011	9/23/2011	10/21/2011	11/18/2011	12/16/2011	
Chris Feliciano	1/22/2011	2/18/2011	3/18/2011	4/29/2011	5/27/2011	6/24/2011	7/16/2011	8/19/2011	9/23/2011	10/21/2011	11/18/2011	12/16/2011	
Bill Picone								8/19/2011	9/23/2011	10/21/2011	11/18/2011	12/16/2011	
Oil Plant/ Yard													
Tyrone Halfhill (GAL)	1/22/2011	2/18/2011	3/18/2011	4/29/2011	5/27/2011	6/24/2011	7/16/2011	8/19/2011	9/23/2011	10/21/2011	11/18/2011	12/16/2011	
Son Vasser (GAL)	1/22/2011	2/18/2011	3/18/2011	4/29/2011	5/27/2011	6/24/2011	7/16/2011	8/19/2011	9/23/2011	10/21/2011	11/18/2011	12/16/2011	
Thomas Story	1/22/2011	2/18/2011	3/18/2011	4/29/2011	5/27/2011	6/24/2011	7/16/2011	8/19/2011	9/23/2011	10/21/2011	11/18/2011	12/16/2011	
Water Plant													
William Gautney	1/22/2011	2/18/2011	3/18/2011	4/29/2011	5/27/2011	6/24/2011	7/16/2011	8/19/2011	9/23/2011	10/21/2011	11/18/2011	12/16/2011	
Sales													
Chris Davidson													
David Donnelley													
Warren Neff	1/22/2011	2/18/2011	3/18/2011										
Total Number trained	**21**	**21**	**21**	**20**	**20**	**20**	**20**	**21**	**21**	**21**	**21**	**21**	**248**
Total Number Required to be trained	**23**	**23**	**23**	**23**	**23**	**23**	**23**	**23**	**23**	**23**	**23**	**23**	**276**
Percentage training complete													**90%**