MITTAUER
& ASSOCIATES, INC.
CONSULTING ENGINEERS &
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December 11, 2012

Mr. Bheem Kothur, P.E., DEE
Division of Waste Management
Florida Department of Environmental Protection
2600 Blair Stone Road
Tallahassee, Florida 32399-2400

RE: Used Oil Processing Facility Permit Renewal &
Solid Waste Management Facility Operation Application - Revision No. 1
FLD 981-928-484
Used Oil Processing Facility Permit No. 72815-HO-009 (Expires Nov. 20, 2012)
Solid Waste Management Facility Permit No. 72815-SO-010 (Expires Nov. 20, 2012)
Duval County - Used Oil Processor
Liquid Environmental Solutions of Florida, LLC
Mittauer & Associates, Inc. Project No. 9122-34-1

Dear Mr. Kothur:

In response to your Request for Additional Information letter dated October 19, 2012, on behalf of Liquid Environmental Solutions of Florida, LLC, Mittauer & Associates, Inc. provides the following responses to your comments:

General Comments:

Comment No. 1: **Please provide the Table of Contents for the permit application.**

Response No. 1: The revised Permit Renewal Application Packet includes a Table of Contents.

Comment No. 2: **Submittal Summary & Five-Year Modification Plan, Submittal Summary, Used Oil Permit renewal, Items 1, 2, and 3: Please provide the closure dates and reports for these items. Also, please paginate the submittal summary & five-year modification plan.**

Response No. 2: Item 1, which addresses the closure of the Sludge Dryer-Tank 48, was closed on October 30, 2007. The closure report for this Sludge Dryer-Tank 48 is attached as Appendix A. Items 2 and 3, which address the reopening of Tank 17 as Virgin Fuel storage and the conversion of Tank 47 from a DAF clarifier

to a Caustic Soda storage tank, respectively, were only re-designated and remained in service. Neither of these were ever closed and/or removed.

The revised Submittal Summary & Five Year Modification Plan is paginated, per DEP request.

Comment No. 3: **Five Year Plant Modification Plan: Please provide the schedule for such modifications in this renewal. Also provide the revised closure cost estimates and financial assurance documents to these modifications to be implemented. The permit renewal cannot be issued until all required financial assurance is in place.**

Also on this Modification Plan (#1) it says the facility is going to close hazardous waste tanks 6 and 81-87. Facility should provide the notification and closure (conversion) schedule to the department at least seven (7) days prior to closing the tanks.

Response No. 3: Liquid Environmental Solutions of Florida, LLC (LES) intends to implement each of the modification items listed in the Modification Plan within the permit renewal period of five (5) years. At this time, LES does not have a firm date as to when each of these modifications will occur. When dates are confirmed for these modifications, LES will provide FDEP with a 30-day notification to allow FDEP sufficient time to prepare for the modifications.

The revised Closure Cost Estimate Summary incorporating these modifications is included as an attachment to the Closing Cost Estimate Form section - DEP Form 62-710.901(7). The updated financial assurance document, a Letter of Credit, was amended November 8, 2012 to include the proposed modifications and is also included as an attachment to the Closing Cost Estimate Form section.

For Item 1 of the Five-Year Plant Modification Plan, LES will provide notification and closure schedule 30 days prior to the closure (conversion) of these tanks.

Comment No. 4: **DEP Form 62-710.901(6), A. General Information, Item 2, Page 8: Please indicate the revision number.**

Response No. 4: The revised DEP Form 62-710.901(6) includes the Revision Number, No. 1, is Section A.2. on Page 8.

Comment No. 5: **Attachment B.3, C.4, C.6 &7, and C.9 (Maps B-3C, B-3d, C-4a, C-9a, and C-9b), Section C-Oil Storage Tank List, Page 9: Please review the tank storage capacities and be consistent throughout the document.**

Response No. 5: The tank storage capacities on the various figures and attachments have all been reviewed and revised to reflect the accurate capacity of each tank.

Comment No. 6: **Attachment C.3, Operating Information, Last Paragraph, Page 1: If you have any other permits Please provide for our records.**

Response No. 6: LES has a Categorical Industrial User Discharge Permit #019 through JEA which became effective February 1, 2009 and expires February 1, 2013. Permit Renewal has been applied for. The cover sheet of the existing permit is attached as Appendix B.

Comment No. 7: **Attachment C.5, Analysis plan, 1.0 Introduction, Third Paragraph, Last but one Sentence, Page 1: The halogen test for Used Oil (UO) to determine if it is on-spec or off-spec (Halogens over 1000 PPM) is not acceptable for Petroleum Contact Water (PCW). A hazardous waste determination must be made for PCW.**

Response No. 7: The revised Attachment C.5 includes a Section 4.0 - PCW Acceptance, which specifically addresses Petroleum Contact Water handling, testing, and acceptance.

Comment No. 8: **Attachment C.5, Analysis Plan, Section 2.0 Acceptance Protocol, Last Paragraph, Last Sentence, Page 5: Please clarify that LES Laboratory is NELAC certified Lab?.**

Response No. 8: The LES laboratory is not a NELAC certified lab. Used Oil and PCW acceptance and export analyses are performed by the LES Laboratory. Any outgoing Used Oil is exported strictly as off-specification Used Oil. All quarterly solids analyses are performed by Test America, which is a NELAC certified laboratory.

Comment No. 9: **Please clarify if UO and PCW will be picked up from generators in one truck or separate trucks.**

Response No. 9: The revised Attachment C.5 states that separate trucks are used to pick up UO and PCW from generators.

Comment No. 10: **UO: LES intends to test load upon arriving at the facility. How does it intend to keep each generator's waste separate if it picks up waste from multiple generators in one truck? The citation in 40 CFR 279.44(a) requires to make determination on each load.**

Response No. 10: The revised Attachment C.5 indicates that LES does not pick up waste from multiple generators with one truck. Each load from every generator is transported separately, with one truck per load.

Comment No. 11: **PCW: Finger printing analysis for PCW should be modified to include pH and halogen testing.**

Response No. 11: The revised Attachment C.5 has added Section 4.0 - PCW Acceptance and incorporates pH and halogen testing in the PCW finger printing analysis.

Comment No. 12: **LES has provided information for incoming waste instead of outgoing waste.**

Response No. 12: The revised Attachment C.5 provides additional information regarding outgoing waste.

Comment No. 13: **Item 2 - Attachment 4: Every quarter complete TCLP and EPA methods 8240 and 8260 analysis should be conducted on at least two loads of sludges being sent for disposal.**

Response No. 13: The revised Attachment C.5 calls for quarterly TCLP and EPA methods 8260 and 8270 analysis to be conducted on a minimum of two loads of sludge being sent for disposal.

Comment No. 14: **Attachment C.6, and 7, Section 4. Certification review and Amendments, Page 4: please review this page, sign and certify.**

Response No. 14: The enclosed LES Spill Prevention, Control and Countermeasure Plan ("SPCC") Section 4 - Certification, Review and Amendments has been reviewed, signed and certified as required.

Comment No. 15: **Attachment C.6, and 7, section 6.0 Facility Description, Second Paragraph, Last two Sentences, Page 8: Please review the total storage capacities and revise as appropriate.**

Response No. 15: The enclosed SPCC has been reviewed and revised to reflect the accurate existing tank storage capacities.

Comment No. 16: **Attachment C.9, Closure Plan: The closure plan should be modified to address the following items:**

a. **All of the waste must be properly characterized, including hazardous waste determination, prior to shipping it off-site.**

b. **Submit a map showing monitoring wells on a map. Also, include their construction details.**

c. **Soil sampling plan should be revised to collect adequate soil samples from all around the permitted tanks and container storage areas. The plan should also list the parameters for analysis and justification for their selection. Additional soil samples should be done near sumps, rack 1 and 3.**

d. **Explain how completion of decontamination will be determined for tanks, pipes and secondary containment, specifically, list parameters for analysis and justification for their selection.**

e. **Does the term "residue" include the rinse waters used in the closure process? The rinse waters from cleaning of the secondary containment and the tanks/piping/etc. should be tested to determine that are non-hazardous.**

f. **LES should state that if all contaminated soils cannot be practically removed or decontaminated, at the time of closure, then it will close the tank system and perform post-closure care requirements that apply to hazardous waste landfills in 40 CFR 265.310, in accordance with 40 CFR 179.54(h)(ii).**

g. **LES shall provide a written notice seven days prior to initiating closure.**

h. **There is inconsistent information in the closure plan regarding closure process, sampling and analytical parameters. The plan should be revised to provide consistent information.**

Response No. 16:

a. Noted. The revised Attachment C.9 - Closure Plan requires that all waste must be properly characterized prior to being shipped off-site.

b. The revised Attachments C-9A & C-9B show the monitoring well locations. Construction details for these monitoring wells were not readily available.

c. The revised soil sampling plan sufficiently collects adequate soil samples from both the interior and the perimeter of the LES site. An additional soil sample location, S12, has been added in between Rack 1 and Rack 3. The revise Closure Plan lists the analysis parameters and provides justification for the selection.

d. The revised Attachment C.9 - Closure Plan provides decontamination completion procedures for tanks, pipes and secondary containment.

e. The term "residue" does include the rinse waters used in the closure process. The Closure Plan requires the rinse waters to be tested to determine that it is non-hazardous.

f. The revised Attachment C.9 - Closure Plan states on Page 2 that if all contaminated soils cannot be removed or decontaminated at time of closure, then LES will close the tank system and perform post-closure care required that apply to hazardous waste landfills in 40 CFR 265.310 and in accordance with 40 CFR 179.54(h)(ii).

g. LES will provide a written notice to DEP thirty (30) days prior to initiating closure.

h. The revised Attachment C.9 - Closure Plan provides consistent information in regards to the closure process, sampling, and analytical parameters.

Comment No. 17: **Please revise the closure cost estimates to address the proposed future tanks (102 through 109) oily water and soil sampling and decontamination process comments for the closure plan above.**

Response No. 17: The revised Closure Cost Estimate Summary includes the proposed future tanks (102 through 109) and additional sampling as part of the revised Closure Plan.

Comment No. 18: **Attachment C.10, used Oil Training, Page 1: This section need to be expanded to include the actual content of the training. Also state that writer training records including name of the employee, date, and type of training will be kept at the site.**

Response No. 18: The revised Attachment C.10 - Used Oil Training Plan includes the actual content of the training and all written training records of the employee, date, and training type will be kept on site for LES records.

Comment No. 19: **Tanks Inspection: LES (f.k.a IWS) facility is in operation since 1986. The facility must provide the documentation of each Tank's last detailed inspection and certification to the Department.**

Response No. 19: No such documentation pertaining to detailed tank inspection/certifications exist. However, all LES tanks with the exception of Tanks 1, 2, 6, & 53 were shop-fabricated and should be not subject to the requirement of Integrity Assessments and Thickness Tests. The SPCC Addendum No. 1, located at the end of Attachment C.6&7, states that repairs, modifications or alterations to existing field-fabricated tanks shall be subject to Brittle Fracture Testing in accordance with API Standard 653 - Tank Inspection, Repair, Alteration and Reconstruction.

Comment No. 20: **Facility need to submit a site map in an electronic format (pdf preferred) so that this map can inserted into the permit.**

Response No. 20: The Site Map was submitted as part of the pdf-formatted electronic copy included within the Permit Renewal Application submittal packet. The revised submittal packet also includes a pdf-formatted electronic copy of the Site Map and includes any applicable revisions.

Comment No. 21: **Facility needs to submit a tank table in an electronic format (pdf preferred) so that this table can be inserted in to the permit.**

Response No. 21: A tank table was submitted as part of the pdf-formatted electronic copy included within the Permit Renewal Application submittal packet. The revised submittal packet also includes a pdf-formatted electronic copy of the tank table and includes any applicable revisions.

Comment No. 22: **Solid Waste Renewal Permit Application, DEP Form 62-701.900(1): Please delete this Form in its entirety and resubmit the DEP form 62-701.900(4), found at www.dep.state.fl.us/waste/quick_topics/forms/documents/62-701/62-701.900(4).pdf)**

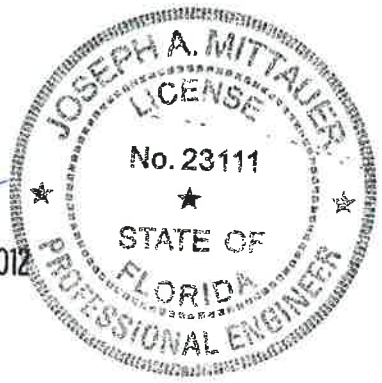
Response No. 22: The revised Permit Renewal Application submittal packet replaces the DEP Form 62-701.900(1) with the fully executed DEP Form 62-701.900(4) - "Application to Construct, Operate, or Modify a Waste Processing Facility".

Comment No. 23: **Please identify non-hazardous and solid waste activities conducted at the site and address the quantities of solid waste stored on site at any given time per day and per month.**

Response No. 23: A description of the non-hazardous and solid waste activities conducted on site can be found as an attachment to the DEP Form 62-701.900(4).

Please contact me via telephone at 904.278.0030 or email at admin@mittauer.com if you need additional information. Thank you for your assistance in expediting the permitting process.

Sincerely yours,
Mittauer & Associates, Inc.



Joseph A. Mittauer, P.E.
President

DEC 10 2012

JAM/KAL/kl

Enclosures

cc: Ed Jesus., LES with encl.
Yuri Turovsky, LES with encl.
Ashwin Patel, FDEP Jacksonville District Office with encl. (4 copies of Form 62-701.900(4))

liquid
ENVIRONMENTAL
SOLUTIONS

Used Oil Processing Facility
Permit Renewal Application
Facility ID No. FLD 981-928-484
Florida Department of Environmental Protection

&

Solid Waste Management Facility
Operation Application
Florida Department of Environmental Protection

Revision No. 1

Submitted by:

MITTAUER & ASSOCIATES, INC.
CONSULTING ENGINEERS
Orange Park, Florida
Project No. 9122-34-1
November 2012

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Attachment C.8

Attachment C.9

Attachment C.10

DEP Form 62-701.900(4)

DEP Form 62-710.901(7)

APPENDICES

SUBMITTAL SUMMARY & FIVE-YEAR MODIFICATION PLAN
LIQUID ENVIRONMENTAL SOLUTIONS OF FLORIDA, LLC
DEP USED OIL PROCESSING FACILITY PERMIT RENEWAL
DEP WASTE PROCESSING FACILITY OPERATION APPLICATION
DEP USED OIL FACILITY CLOSING COST ESTIMATE FORM
Project No. 9122-34-1
Dated: November 2012

Submittal Summary

Liquid Environmental Solutions of Florida, LLC (LES) is enclosing the Used Oil Processing Facility Permit Renewal, the Waste Processing Facility Operation Application and the Used Oil Facility Closing Cost Estimate Form as part of this submittal. We are submitting the Used Oil and Waste Processing applications concurrently as suggested and agreed upon with Mr. Bheem Kothur of the FDEP, Division of Waste Management.

Below you will find an overview and items of note for each Application that should be of use in the review process of these Applications.

Used Oil Permit Renewal

The LES-Jacksonville facility has undergone only minor changes since the last permit renewal issued in 2008 and are described below:

1. LES properly closed and removed Tank 48, a sludge dryer, from the facility site on October 30, 2007. The closure report for Tank 48 is attached in Appendix A.

2. LES reopened Tank 17 and is being used as a fuel-feeding tank to the "boiler" and is only storing Virgin Fuel.

3. LES converted Tank 47 from a DAF clarifier to a Caustic Soda storage tank

These minor changes are reflected on the enclosed existing LES facility site plans and piping diagrams as well as on any Used Oil Permit Renewal attachments related to these changes.

Waste Processing Facility Operation Application

The LES-Jacksonville facility is not a terminal receiver of solid waste as it only processes spent industrial waste streams with the resulting solid waste being transported to a landfill. Therefore, the Revision 1 submittal has included the Waste Processing Facility Application in lieu of the Solid Waste Application, as the majority of this form does not apply to the LES-Jacksonville facility.

Used Oil Facility Closing Cost Estimate Form

The Used Oil Facility Closing Cost Estimate Form is included with this submittal. We intend that this closing cost estimate will be sufficient to provide for the requirements of the Used Oil Facility Permit Renewal as well as the Waste Processing Facility Operation Application. You will find the Closing Cost Estimate Form as well as copies of all required information attached along with the Form.

Five-Year Plant Modification Plan

As LES continues to improves its operations and facilities within the next five years, expansion and various modifications are expected to occur throughout. The following list identifies and describes the modifications LES intends to make:

1. The closure of all facility Hazardous Waste Tanks 6 & 81-87. Tanks 6 & 83-87 will be converted to oily water (OW) tanks and Tanks 81 & 82 will be converted to petroleum contact water (PCW) tanks. The closure process for these tanks has already begun and LES is working with DEP to ensure the proper steps are being taken.

2. The addition of up to eight (8) new vertical 14,000 gallon OW tanks, Tanks 102-109. These tanks will be located just south of the existing Tanks 1 & 2.

3. The removal and closures of Tanks 3A, 3B, 4A & 4B. These tanks and associated piping/equipment will be removed from the site and a drum storage/handling area will located in place of the tanks.

4. A new offloading area, Rack 5 Used Oil/Oilywater Unloading Area, will be constructed immediately north of Tank 54. The Maintenance Shop will be relocated to the panhandle area of the existing property adjacent to 7th Street and Talleyrand Avenue.

5. Additional adjacent property is expected to be leased/purchased for use as a transportation yard as well as for temporary off-spec fuel storage in three (3) 20,000 gallon frac tanks. The frac tanks are slated to be located at the southern end of the expanded property. The Preliminary Expansion Aerial Map, **Figure 1**, reflects this proposed expansion and immediately follows this page.

These modifications are reflected within Attachments **B-3d** and **C-9b**. LES has revised its existing Closure Cost Estimate and updated its Financial Assurance documents to include these planned modifications. LES will provide FDEP 30 days notice prior to implementing any of these modifications and/or closures.

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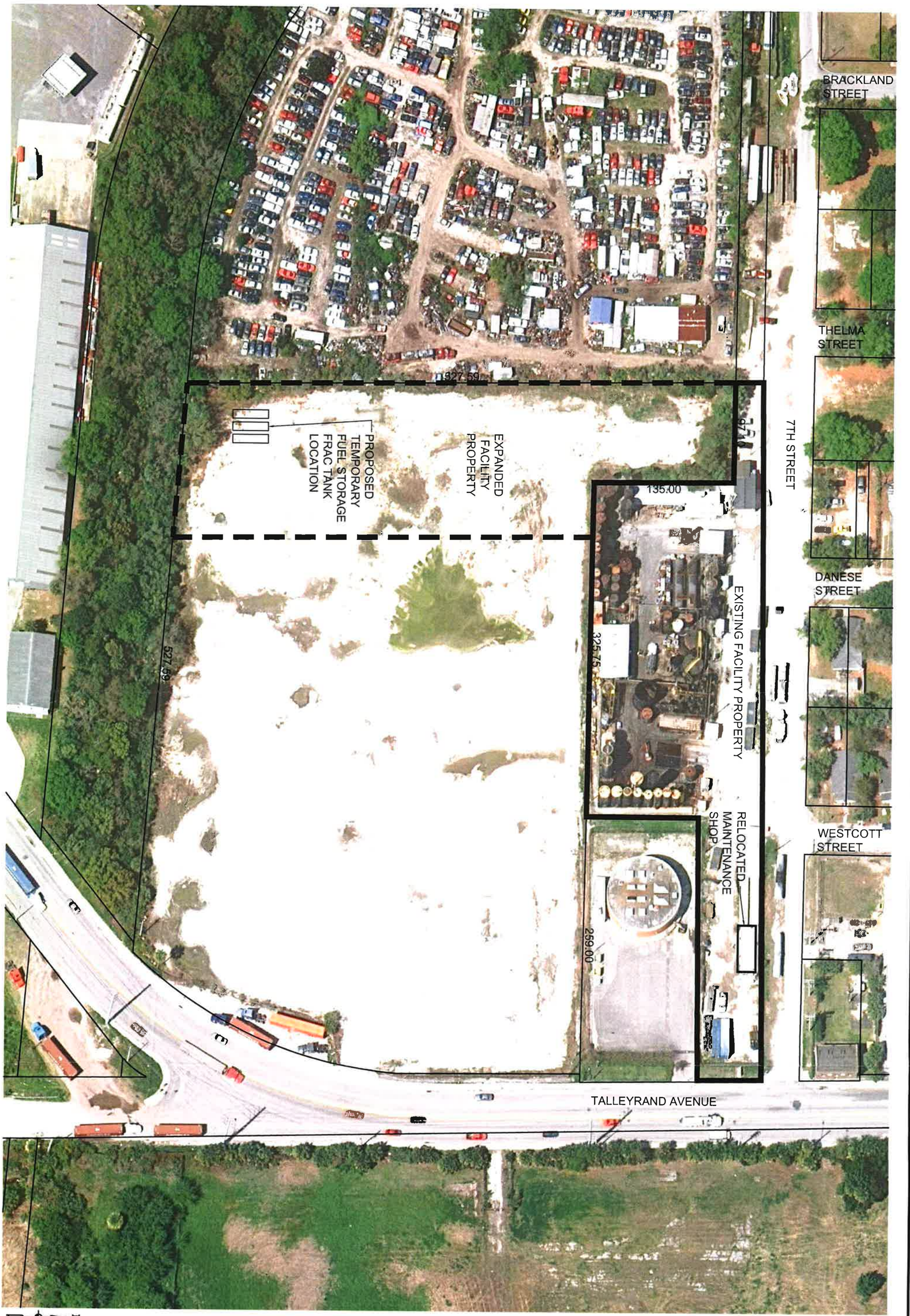

JOB NO. 9122-34-1
FIGURE 1

LIQUID ENVIRONMENTAL SOLUTIONS OF FLORIDA, LLC
Used Oil Processing Facility Permit
Preliminary Aerial Expansion Map
Duval County, Florida

MITTAUER & ASSOCIATES, INC.
CONSULTING ENGINEERS
580-1 WELLS ROAD, ORANGE PARK, FLORIDA 32073
TEL. (904) 278-0030 FAX. (904) 278-0840 FLORIDA CA NO. 6569

DESG	***
DRWN	***
PROJ MGR.	***
DATE	9/13/12
1 INCH	

NO	DATE	BY	REVISION DESCRIPTION

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

Department of Environmental Protection (DEP)

Used Oil Processing Facility Permit Application Form and Instructions

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GENERAL INSTRUCTIONS TO APPLY FOR A USED OIL PROCESSING FACILITY PERMIT

APPLICANTS ARE ENCOURAGED TO ARRANGE FOR A PRE-APPLICATION MEETING

WHO MUST FILE (40 CFR, Part 279.50)
All persons involved in the processing of used oil as defined in Chapter 40, Part 279 of the Code of Federal Regulations (CFR) and Rule 62-710 of the Florida Administrative Code (F.A.C.).

WHERE TO FILE
Send the original permit application package with all attachments, along with one copy of the application package and amendments to:

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

Include a Certification (DEP Form 62-710.901(d), F.A.C.) with the original signature.

The Department will review and comment on the completeness of the application within 30 days of receipt of the application. If it is not complete, the Department will send the applicant a Notice of Deficiency (NOD) within the prescribed time and will ask the applicant to send additional information or correct apparent errors or omissions. The applicant must send the original plus one copy with the additional information within the time specified in the NOD. Again, include a Certification (DEP Form 62-710.901(d), F.A.C.) with each copy. Provide a header with the revision number, page number and date on each page of the additional information so that it can be inserted into the application at its proper place.

RENEWALS
The fee for a permit renewal is $2,000. The owner or operator must apply for a renewal of the permit prior to 60 days before the expiration of a facility operating permit. If a facility has operated under the existing permit without any facility or regulatory changes, then the owner or operator must submit (1) a letter demonstrating how the facility will comply with any applicable new or revised laws and rules relating to its operation (NOTE: information submitted to the Department in support of the expiring permit, and which is still valid, does not need to be re-submitted but must be accurately referenced to the effective dates of the existing documents); (2) the Certification (DEP Form 62-710.901(d), F.A.C.); and (3) the permit renewal fee, payable to the Florida Department of Environmental Protection.

However, if there are any major modifications to the facility plan, its operation, or regulatory changes that substantially affect its operation, then the owner or operator must submit a new application for a permit.

COMPLETION OF THE APPLICATION
Type or print (in ink) the application. Answer all questions in all parts of the application which apply to the facility. Provide a header with revision number, date, and page number on each page of the application. Mark any questions that are not applicable "N/A." Type, print or sketch (in ink) all necessary attachments on 81/2" x 11" paper (except for any required maps or scale drawings). The application must be bound and clearly presented with correlated attachments in the exact format described in these instructions.

Incomplete applications will delay the permit process and could affect the continued operation of existing facilities.

SPECIFIC INSTRUCTIONS TO APPLY FOR A USED OIL PROCESSING FACILITY PERMIT

The fee for a Used Oil Processing Facility Permit is $2,000. A check for this amount, payable to the Florida Department of Environmental Protection, should be included with this application.

The Used Oil Processor Permit Application consists of two parts:

PART I - Application

This part includes items regarding general information about the siting and ownership of the facility, and operating information (including process descriptions, operating plans, preparedness and prevention, contingency plans, unit management, closure and training). The standards applicable to this information are found in Chapter 40, Part 279 Subpart F of the Code of Federal Regulations (CFR) and in Rule 62-710.800, F.A.C.

PART II - Certification

This part contains the facility operator's, facility owner's, land owner's and professional engineer's certification of the application and all attachments as required in Rule 62-710.800, F.A.C. Include a new certification with original signatures plus one copy with each new submittal.

Confidential Information

Information submitted to the Department relating to secret processes, methods of manufacture or production, or confidential records may be claimed by the applicant to be of a confidential nature. Claims of confidentiality must be submitted as described in 403.11 and 403.73, Florida Statutes.

LINE BY LINE INSTRUCTIONS FOR COMPLETING PART I OF THE APPLICATION FOR A USED OIL PROCESSING FACILITY PERMIT

PART I - Application and Used Oil Processing Facility Requirements

A. General Information

1. Place an "X" in the appropriate box for the type of permit application.
2. Enter the revision number (the initial application revision number is 0).
3. Processors involved in other regulated activities must comply with applicable subparts of 40 CFR, Part 279. Mark an "X" in the boxes applicable to the facility's operation. (40 CFR, Part 279.50(b))
4. Enter the date operation began, or the proposed date of the start of an operation.
5. Enter the full legal name of the company. (40 CFR, Part 279.50(b)(2)(i))
6. Enter the facility's EPA identification number. If you do not have an identification number, attach a completed EPA Form 8700-12 "Notification of Regulated Waste Activity" to this application. (40 CFR, Part 279.51(a))
7. Enter the location or street address of the facility. If the facility lacks a street name or route number, give the most accurate alternative geographic information. (40 CFR, Part 279.51(b)(2)(vi))
8. Enter the complete mailing address of the facility. (40 CFR, Part 279.51(b)(2)(iii))
9. Enter the name, title, mailing address and telephone number of a contact person (an employee who is thoroughly familiar with the operation of the facility and whom the Department can contact regarding this application). (40 CFR, Part 279.51(b)(2)(iv))
10. Enter the full legal name, address and telephone of the operator if different from number 9.
11. If the facility owner and operator are not the same person, enter the name, address and telephone number of the owner. (40 CFR, Part 279.51(b)(2)(ii))
12. Enter an "X" in the appropriate block to indicate the facility's legal structure and provide other appropriate information relating to the legal structure of the facility.
13. Enter an "X" into the appropriate block and provide other appropriate information relating to facility ownership. (40 CFR, Part 279.51(b)(2)(ii))
14. Provide the name, registration number, and address of the professional engineer who will certify the appropriate parts of the application. (Rule 62-710.800(3), F.A.C.) If the engineer is associated with a firm, provide the name of the firm.
    These parts include:
    a) Certification of secondary containment adequacy (capacity), structural integrity (structural strength), and underground process piping for storage tanks, process tanks, and container storage
    b) Certification of leak detection
    c) Certification of any substantial construction modifications
    d) Certification of the closure plan
    e) Certification of tank design for new or additional tanks
    f) Recertification of any of the above items

Note: When completing this application, the applicant should be aware of any other federal, state and local permit requirements applicable to the facility. Some requirements of this application may be satisfied using other permit requirements as background or baseline information (e.g. stormawater management, contingency plans, employee safety and training).

B. Site Information

1. Enter the county and name of the community nearest to the facility. Provide the latitude, longitude, section, township and range to approximate geographic center of the facility. Take this information from the most recent USGS topographic map available. Also provide the Universal Transverse Mercator Grid number (UTM #). This is a 15 digit number in the following format: 00/000000/0000000. the first 2 digits are the zone number, the middle 6 digits are the easting and final 7 digits are the northing.

2. Enter the area (in acres) of the facility site. A facility site includes all contiguous land and structures, other appurtenances, and improvements on the land used for used oil processing operations.

3. Attach a standard USGS contour map extending 2,000 feet beyond the property boundaries of the facility site. The map should indicate:
   a) The map scale and date
   b) Any 100-year flood plain area (include a copy of the FIA or FEMA map)
   c) The orientation of the map

C. Operating Information

Note: Applicants are strongly encouraged to arrange a pre-application meeting with their local district office to address sensitive information and description details prior to preparing the permit application.

1. Indicate the facility's hazardous waste generator status.

2. List the applicable EPA hazardous waste codes as identified in 40 CFR, Part 261.

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

4. A detailed description of the used oil 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. The map should indicate the legal boundaries of the facility showing:
   a) Access control (fences and gates)
   b) Buildings and other structures (equipment, recreational areas; access and internal roads; storm, sanitary and process sewerage systems; fire control facilities; etc.)
   c) Tanks and containers
   d) Loading and unloading areas
   e) Drainage or flood control barriers
   g) Runoff control system (or refer to the facility's stormwater permit)

5. Attach copies of the operating plan which must include the following information:
   a) An analysis plan which must include at a minimum (40 CFR, Parts 279.53 and 279.55):
      (i) Sampling plan, including methods and frequency of sampling and analyses;
      (ii) Fingerprint analysis on incoming shipments, as appropriate; and
      (iii) Representative analyses on outgoing shipments (one batch/lot can equal a shipment, provided the lots are discreet units), to include: metals and halogen content.
   b) A description of the management of sludges, residues and byproducts. This should include the characterization analysis as well as the frequency of the removal of the sludge. (40 CFR, Parts 279.10(e) and 279.59)
   c) An explanation or copies of the forms used for the purposes of tracking and recording shipments of used oil into and out of the facility. Note: These records must be retained for at least three years and must include (40 CFR, Part 279.56):
      (i) For incoming shipments: the name, address and EPA ID number of the delivering transporter, the name, address and EPA ID number (if applicable) of the origin of the used oil, the quantity of used oil accepted, and the date of acceptance; and
      (ii) For outgoing shipments: The name, address and EPA ID number of the transporter and end user of the outgoing shipment, the quantity of used oil shipped, and the date of shipment.

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 sudden or non-sudden releases of used oil to air, soil, surface water, or groundwater which could threaten human health or the environment. This description must show evidence of (40 CFR, Part 279.52(a)):

a) An internal communications or alarm system capable of giving immediate emergency instruction to facility personnel

b) A communication device capable of summoning assistance from local emergency response groups (fire, law enforcement, emergency response)

c) Fire and spill control equipment: inventories and maps (including fire extinguishers appropriate in type, size and location; adequate spill control equipment; decontamination equipment)

d) Water at adequate volume and pressure for all fire control equipment

e) Testing and maintenance schedules for all emergency equipment

f) Access to a communication or alarm device, either directly or by visual or auditory (voice) contact with another employee, wherever used oil is being handled

g) Immediate access to a device capable of summoning external emergency assistance in the event only one employee is on the premises

h) Proper aisle space for containers and equipment

i) Arrangements with local authorities, to include:

(i) Familiarization of fire departments and emergency response teams with the layout of the facility, properties of used oil handled at the facility and all associated hazards, normal employee work areas, entrances and evacuation routes;

(ii) At facilities scheduled for possible multiple emergency response units, agreements designating both primary and supporting authorities;

(iii) Agreements with State emergency response teams, emergency responses contractors and emergency equipment suppliers;

(iv) Familiarization of local hospitals with the properties of the materials handled at the facility and the possible injuries/illnesses resulting from fires, explosions, or releases at this facility; and

(v) Documentation of any refusal of any of the described entities to enter into an agreement with the facility (to be noted in operating record).

j) Corrective actions taken in response to spills/leaks. (Rules 62-761.700 and 62-762.700, F.A.C.)

7. Attach a copy of the contingency plan and emergency procedures. This requirement may be satisfied by modifying or expounding upon an existing SPCC plan required under 40 CFR 112, (279.52(b)(2)(ii)) or should contain (40 CFR, Part 279.52(b):

a) Specific actions/procedures to follow in response to fire, explosion, or sudden releases.

b) A description of the emergency response arrangements required in the Preparedness and Prevention plan.

c) Names, addresses, phone numbers and qualifications of the primary emergency response coordinator (ERC) as well as designated subordinate ERCs.

d) Procedures used by the ERC to activate the emergency response plan (notify employees and appropriate authorities), assess the situation, and to commit resources to properly contain, manage and clean-up the situation.

e) Descriptive inventory and location (map) all emergency response equipment (fire extinguishing systems, spill control equipment, internal and external communications and alarm systems, and decontamination equipment) including location (map).

f) Identify containers and/or tanks available to hold any released material.

g) Describe how equipment will be replaced/cleaned for future use.

h) Facility personnel evacuation plan, describing signals and both primary and alternate routes.

i) Copies of this plan must be maintained at the facility and submitted to local emergency response authorities identified in the preparedness and prevention plan.

j) The plan must be amended when needed (i.e., regulations change, plan fails upon use, the facility process or contingency plan is modified).

k) Incidents must be reported to appropriate agencies.

8. Attach a description of the facility's unit management plans. Submit documentation demonstrating that all aboveground used oil process and storage tanks and containers as well as fill pipes for

underground storgage tanks are properly labeled with the words "Used Oil." In addition, the management plan description must include documentation which shows that all used oil storage and process tanks and containers meet the following requirements:

a) For containers:
   (i) Adequate aisle space;
   (i) Adequate secondary containment, including design, capacity and specifications; and
   (ii) Inspections and corrective actions.

b) For tanks:
   (i) All aboveground storage and process tanks must meet the requirements of Rules 62-762.500 (Performance Standards for New Storage Tank Systems), 62-762.510 (Performance Standards for Existing Shop-Fabricated storage Tank Systems), 62-762.520 (Performance Standards for Existing Field-Erected Storage Tank Systems), 62-762.600 (General Release Detection Standards), and 62-762.700 (Repairs to Storage Tank Systems). All underground storage and process tanks must meet the requirements of Rules 62-761.500 (Performance Standards for New Storage Tank Systems), 62-761.520 (Performance Standards for Other Existing Petroleum and Petroleum Product storage Systems Non-Vehicular Fuels), 62-761.600 (General Release Detection standards), 62-761.620 (Release Detection Standards for Other Regulated Substance Storage Tanks), 62-761.630 (Release Detection Standards for Integral Piping), and 62-761.700 (Repairs to Storage Tank Systems).
   (ii) All storage and process tanks must have a closure plan that meets the requirements of Rules 62-761.800 (Underground Storage Tank Systems: Out of Service and Closure Requirements) and 62-762.800 (Aboveground Storage Tank Systems: Out of Service and Closure Requirements).
   (iii) All storage and process tanks must have an inspection or monitoring plan that meets the requirements of Rules 62-761.600 (Underground Storage Tank Systems: General Release Detection Standards) and 62-762.600 (Aboveground Storage Tank Systems: General Release Detection Standards).
   (iv) A plan for the removal of released material and accumulated precipitation from secondary containment

9. Attach a copy of the facility's Closure plan (40 CFR, Part 279.54(h). At time of closure, the permit will be modified to address site specific closure standards. The attached plan may be generic in nature and should include, at a minimum:

a) A closure schedule;
b) A listing of tanks, piping and other equipment that will be cleaned/closed;
c) Procedures for decontamination of tanks, containers, pipes, equipment and other process areas;
d) A listing and justification of sampling methods (including number of samples), sampling parameters, and analytical methods. All sampling and analysis must be in accordance with SW-846 or equivalent methods;
e) A description of the characterization and disposal of rinsewaters and residues generated from clean-up and closure activities;
f) A description of the characterization and disposal of solid wastes generated from clean-up and closure activities;
g) A description of soil sampling near secondary containment. Also describe how the following will be adressed at time of closure, in accordance with 40 CFR, Part 279.54(h)(ii):
   (i) A description of how, if soil is contaminated, the groundwater will be sampled; and
   (ii) A description of how, if groundwater is contaminated, the facility will meet the closure requirements of 40 CFR, Part 265.310, Closure and Post-Closure Permit.

10. Attach a description of the facility's employee training program. This description should document:

a. The methods and/or materials used to familiarize employees with all state and federal rules and regulations.
b. The method of documenting that employees have been trained to use emergency equipment.

c. How the employee education program is updated to address changes in applicable regulations or facility operations.

APPLICATION FORM FOR A USED OIL PROCESSING FACILITY PERMIT

Part I

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

A. General Information

1. New____ Renewal X ⊞ Modification _____ **Date old permit expires** 11/20/2012

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)
X transporters (Subpart E)
_____ burners of off-spec used oil (Subpart G)
X marketers (Subpart H)
or
_____ are disposing of used oil (Subpart I)

4. Date current operation began: 1986

5. Facility name: Liquid Environmental Solutions of Florida , LLC

6. EPA identification number: FLD-981-928-484 ⊞

7. Facility location or street address: 1640 Talleyrand Avenue, Jacksonville, FL 32206 ⊞

8. Facility mailing address:
1640 Talleyrand Avenue | Jacksonville | FL | 32206
Street or P.O. Box | City | State | Zip Code

9. Contact person: Yuri Turovsky Telephone: 904 438-2138
Title: Plant Manager
Mailing Address:
1640 Talleyrand Avenue | Jacksonville | FL | 32206
Street or P.O. Box | City | State | Zip Code

10. Operator's name: Yuri Turovsky Telephone: (904) 438-2138
Mailing Address:
1640 Talleyrand Avenue | Jacksonville | FL | 32206
Street or P.O. Box | City | State | Zip Code

11 Facility owner's name: Liquid Environmental Solutions of Florida, LLC Telephone: (904) 438-2138
Mailing Address:
1640 Talleyrand Avenue | Jacksonville | FL | 32206
Street or P.O. Box | City | State | Zip Code

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

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

Name: N/A
Mailing Address:

Street or P.O. Box City State Zip Code

Name:
Mailing Address:

Street or P.O. Box City State Zip Code

Name:
Mailing Address:

Street or P.O. Box City State Zip Code

Name:
Mailing Address:

Street or P.O. Box City State Zip Code

13 Site ownership status: [owned [ ]to be purchased [ ]to be leased ____ years
[X]presently leased; the expiration date of the lease is: 12/31/2030

If leased, indicate:
Land owner's name: A. Thomas Dudley, Sr.
Mailing Address: 1010 E. Adams Street Jacksonville FL 32202

Street or P.O. Box City State Zip Code

14 Name of professional engineer Joseph A. Mittauer Registration No. 23111
Mailing Address:
580-1 Wells Road Orange Park FL 32073

Street or P.O. Box City State Zip Code
Associated with: Mittauer & Associates, Inc.

B. SITE INFORMATION

1. Facility location:
County: Duval
Nearest community: Jacksonville
Latitude: 30°20'36"N Longitude: 81°37'46"W
Section: 8 Township: 2S Range: 27E
UTM # 17 / 439460E / 33568 / 50N

2. Facility size (area in acres): 1.6

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

See Attachment B.3

C. OPERATING INFORMATION

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

2. List applicable EPA hazardous waste codes:
   D001, D002, D006, D0007, D009, F003, D011
   All hazardous waste is generated from Laboratory Activities: clor-d-tect kits, xylene and COD test waste

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 C.3

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 C.4

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 C.5 ☐

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

   Sludge, residue and byproduct management description is labeled as Attachment C.5 ☐

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

   The tracking plan is included as Attachment C.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 C. 6 & 7

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

   The contingency plan is labeled as Attachment C. 6 & 7

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

   The unit management description is labeled as Attachment C.8

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

   The closure plan is labeled as Attachment C.9

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

    A description of employee training is labeled as Attachment C.10

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: Liquid Environmental Solutions of Florida, LLC EPA ID# FLD-981-928-484

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*
Liquid Environmental Solutions of Florida, LLC

Yuri Turovsky, Plant Manager

Name and Title (Please type or print)

Date: DEC 10 2012 Telephone: (904) 438-2138

* 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: Liquid Environmental Solutions of Florida, LLC EPA ID# FLD-981-928-484

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*
Liquid Environmental Solutions of Florida, LLC

Ed Jesus, Regional Vice President
Name and Title (Please type or print)

Date: DEC 10 2012 Telephone: (904) 438-2138

* 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: Liquid Environmental Solutions of Florida, LLC EPA ID# FLD-981-928-484

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.

A Thomas Dudley

Signature of the Land Owner or Authorized Representative*
Liquid Environmental Solutions of Florida, LLC

A. Thomas Dudley, Sr.

Name and Title (Please type or print)

Date: DEC 10 2012 Telephone: (904) 438-2138

* 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-981-928-484 2. Tank Numbers: See Listing on Topographic Map

3. Facility Name: Liquid Environmental Solutions of Florida, LLC

4. Facility Address: 1640 Talleyrand Avenue, Jacksonville, FL 32203

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

Joseph A. Mittauer, P.E.
Name (please type)

Florida Registration Number: 23111

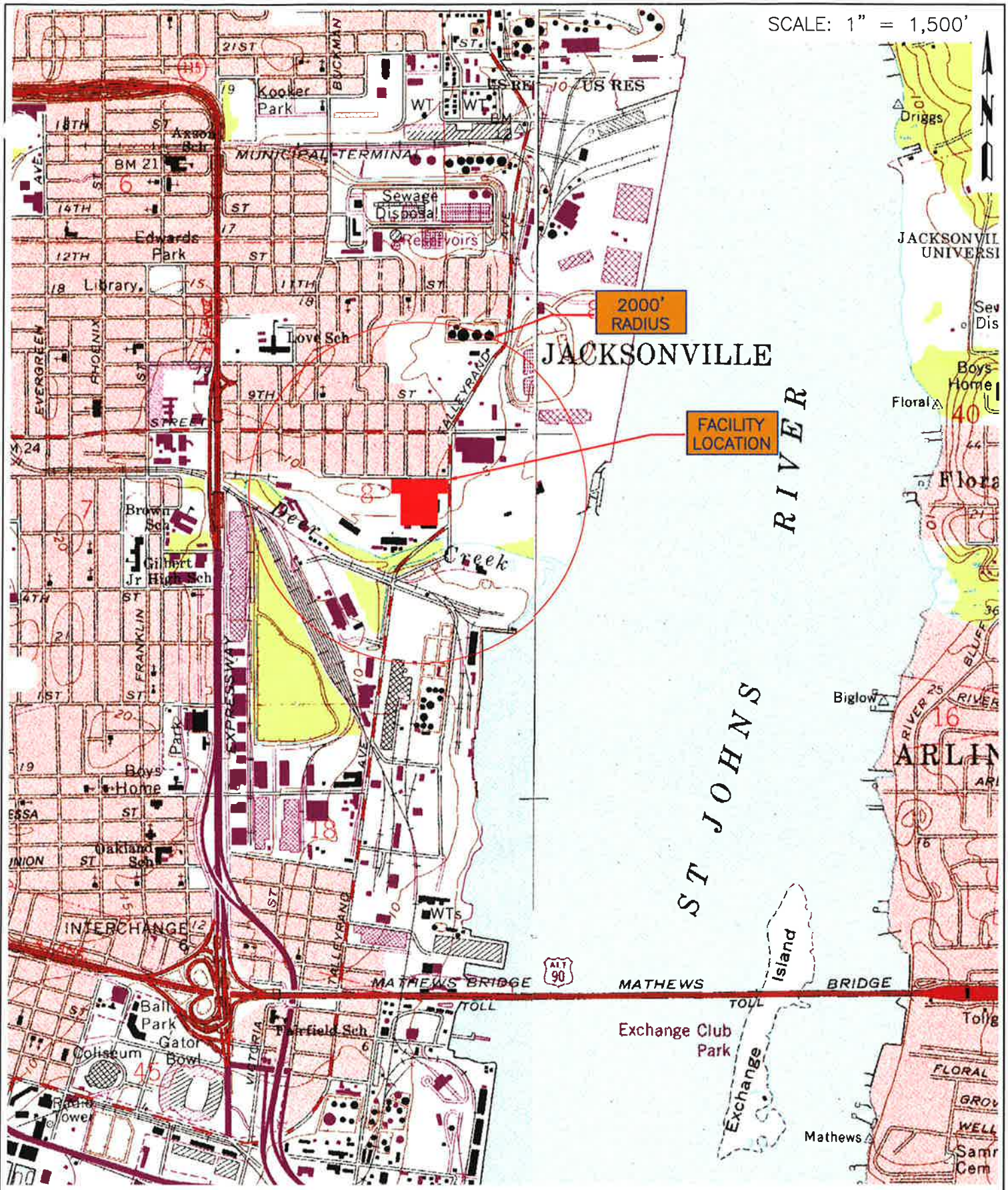
Mailing Address: 580-1 Wells Road
Street or P. O. Box

Orange Park FL 32073
City State Zip

Date: DEC 10 2012 Telephone (904) 278-0030

JOSEPH A. MITTAUER LICENSE No. 23111 STATE OF FLORIDA PROFESSIONAL ENGINEER

[PLEASE AFFIX SEAL]



MITTAUER & ASSOCIATES, INC.
CONSULTING ENGINEERS
580-1 WELLS ROAD, ORANGE PARK, FLORIDA 32073
TEL. (904) 278-0030 FAX. (904) 278-0840 FLORIDA CA NO. 6569

LIQUID ENVIRONMENTAL SOLUTIONS OF FLORIDA, LLC
Used Oil Processing Facility Permit
USGS Contour Map
Jacksonville, FL

Attachment
B-3a
September 2012
Project No.
9122-34-1

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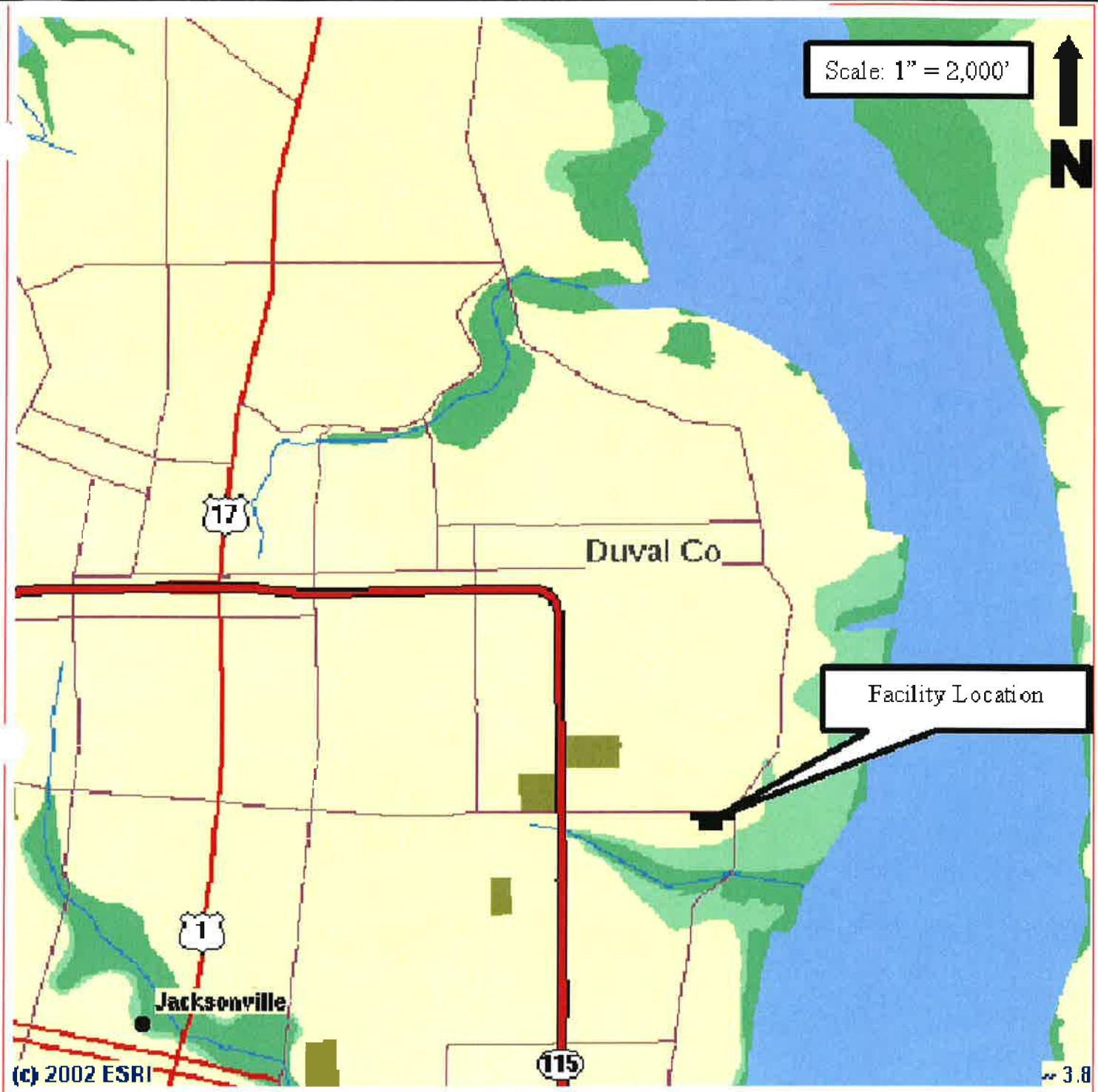

100 – Year Flood Plain

500 – Year Flood Plain

Water Bodies

Above 500-Year Flood Plain

MITTAUER & ASSOCIATES, INC.
CONSULTING ENGINEERS
580-1 WELLS ROAD, ORANGE PARK, FLORIDA 32073
TEL. (904) 278-0030 FAX. (904) 278-0840 FLORIDA CA NO. 6569

LIQUID ENVIRONMENTAL SOLUTIONS OF FLORIDA, LLC
Used Oil Processing Facility Permit
100–Year Flood Plain Area
Jacksonville, FL

Attachment
B–3b
September 2012
Project No.
9122–34–1

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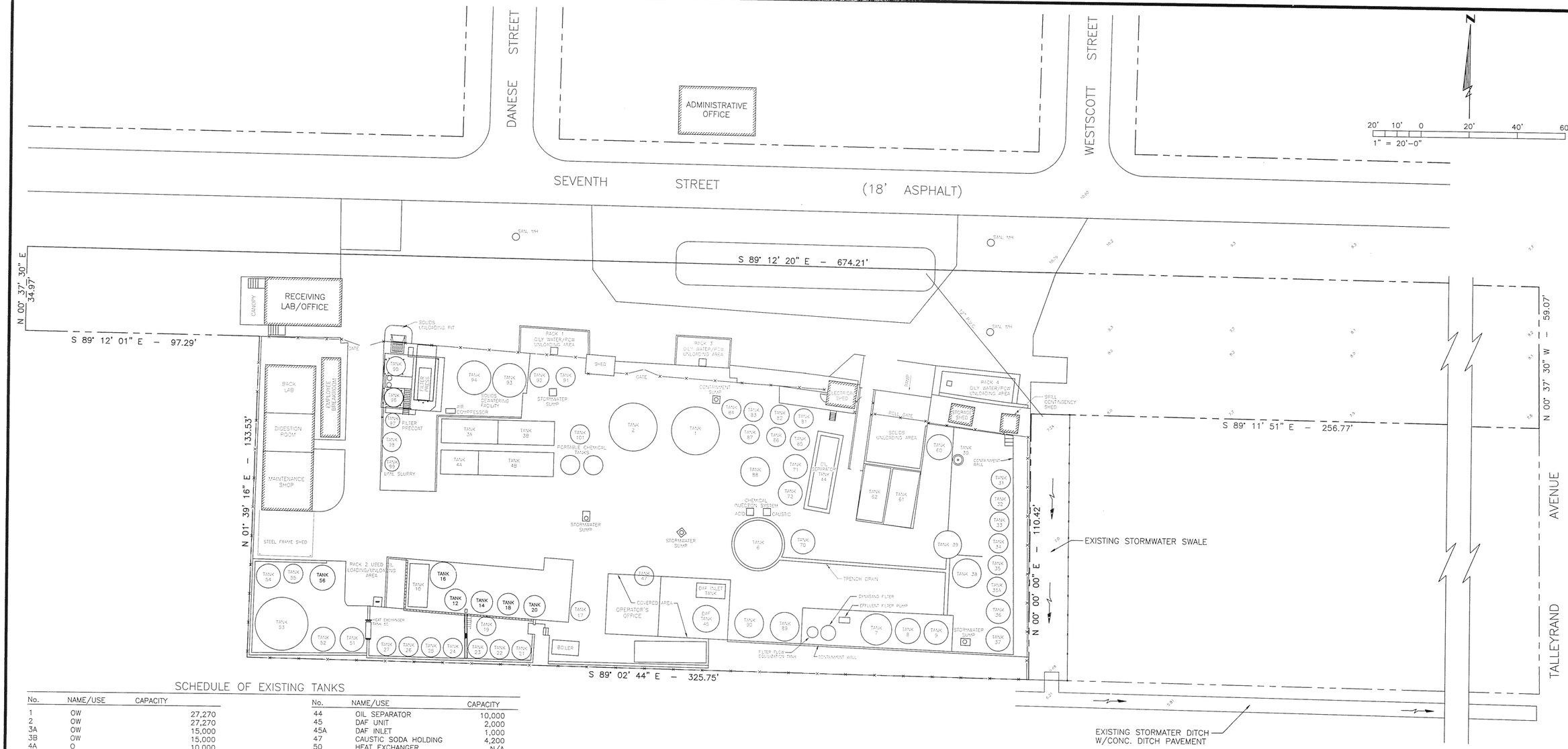

SCHEDULE OF EXISTING TANKS

No.	NAME/USE	CAPACITY
1	OW	27,270
2	OW	27,270
3A	OW	15,000
3B	OW	15,000
4A	O	10,000
4B	O	20,000
6	HAZ WASTE	62,000
7	W	22,000
8	W	22,000
9	W	23,000
10	O	4,800
12	O	7,800
14	O	9,750
16	O	16,075
17	VIRGIN FUELS	1,200
18	O	9,950
19	O	7,800
20	O	7,800
21	VIRGIN FUELS	8,000
22	O	7,800
23	O	9,950
24	O	15,000
25	O	15,000
26	O	15,000
27	O	15,700
30	W	500
31	W	10,000
32	W	12,000
33	W	12,000
34	W	12,000
35	W	10,000
35A	W	11,650
36	W	20,000
37	W	20,000
38	W	30,000
39	W	30,000
40	HEAT EXCHANGER	N/A

No.	NAME/USE	CAPACITY
44	OIL SEPARATOR	10,000
45	DAF UNIT	2,000
45A	DAF INLET	1,000
47	CAUSTIC SODA HOLDING	4,200
50	HEAT EXCHANGER	N/A
51	O	15,000
52	O	15,000
53	O	85,000
54	O	19,000
55	O	9,750
56	O	20,000
60	S	12,000
61	S	8,000
62	S	8,000
70	S/OW	9,500
71	OW	6,500
72	OW	6,500
81	HAZWASTE–PCW	5,000
82	HAZWASTE–PCW	5,000
83	HAZ WASTE	5,500
84	HAZ WASTE	5,500
85	HAZ WASTE	6,000
86	HAZ WASTE	6,000
87	HAZ WASTE	6,000
88	OW	6,000
89	S	10,000
90	S	10,000
91	OW	5,000
92	OW	5,000
93	S/OW	12,000
94	S/OW	12,000
95	S	4,000
96	S	4,000
97	FILTER PRECOAT	1,000
98	W	12,000
99	LIME SLURRY	1,000
101	O	6,000

TANK LEGEND

O	–	OIL MANAGEMENT UNIT
OW	–	OILY WATER
PCW	–	PETROLEUM CONTACT WATER
S	–	SLUDGE OR SOLIDS
W	–	WATER

NO	DATE	BY	REVISION DESCRIPTION
6	10/05/07	WF	REMOVED TANK 48, NEW TANKS 17 & 35A
5	10/17/06	JZ	REMOVED TANKS 45 & 46, NEW TANK 45
4	4/1/03	JZ	REVISED TANK 11, 12, 13, 14, 15, 16, 17, 18, 18a, 20, 28,
3	4/1/03	JZ	REVISED SECOND TANK 11, 12, 13, 14, 15, 16, 17, 18 & 20
2	12/27/02	JZ	RELABELED TANKS 6, 38, 39, 81 & 82, DELETED TANK 29
1	11/1/02	JZ	REMOVED TANKS 11, 12, 13, 14, 15, 16, 17, 18, 18a 20, 28 & 29

DESG
DRWN
CHKD
APRV
DATE 9/13/12

MITTAUER & ASSOCIATES, INC.
CONSULTING ENGINEERS
580-1 WELLS ROAD, ORANGE PARK, FLORIDA 32073
TEL: (904) 278-0030 FAX: (904) 278-0840
FLORIDA CA No. 6569

LIQUID ENVIROMENTAL SOLUTIONS OF FLORIDA, LLC
Used Oil Processing Facility Permit
Existing Topographic Map
Jacksonville, Florida

JOB NO. 9122-34-1
SHEET NO. B–3c

JOSEPH A. MITTAUER LICENSE No. 23111 STATE OF FLORIDA PROFESSIONAL ENGINEER

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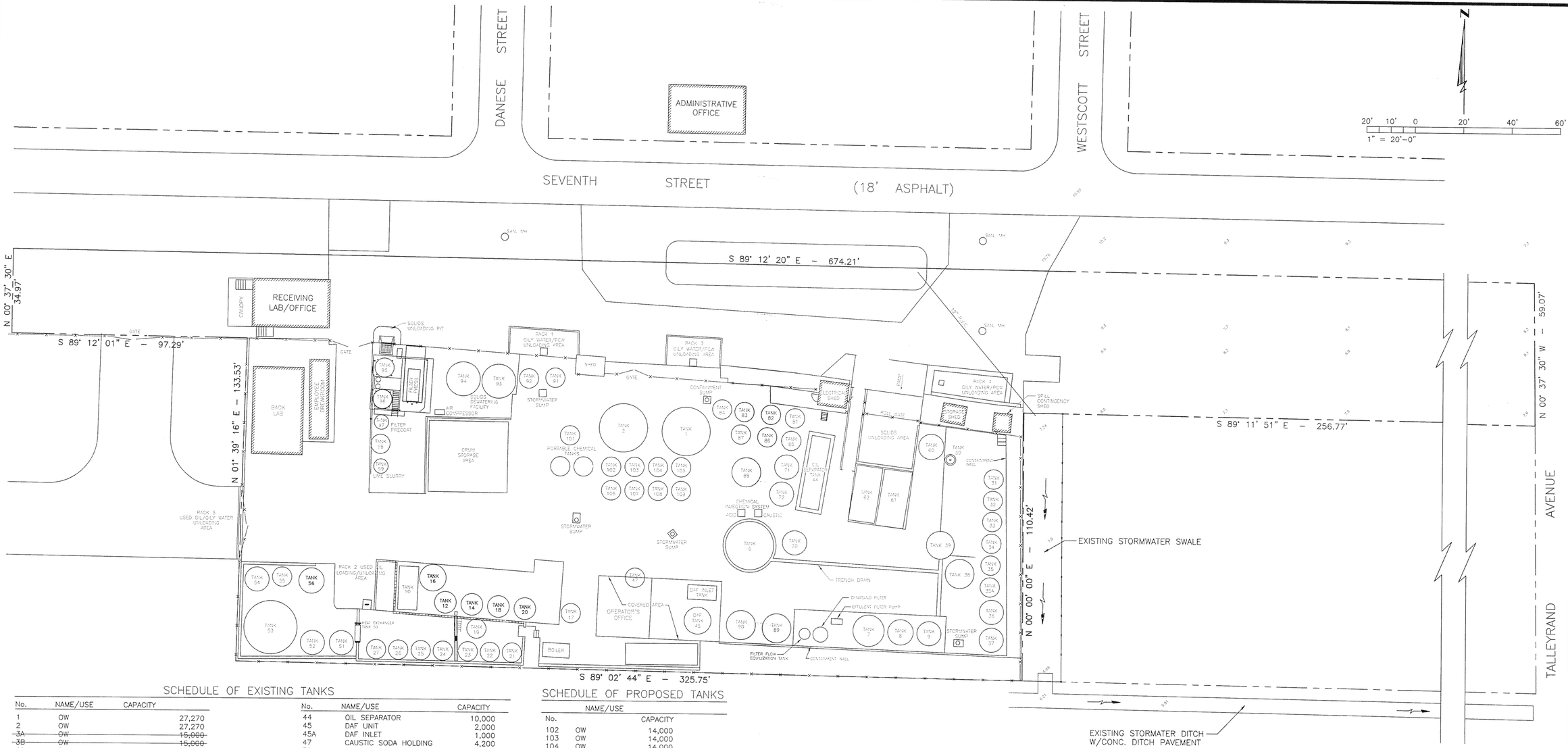

SCHEDULE OF EXISTING TANKS

No.	NAME/USE	CAPACITY
1	OW	27,270
2	OW	27,270
~~3A~~	~~OW~~	~~15,000~~
~~3B~~	~~OW~~	~~15,000~~
~~4A~~	~~O~~	~~10,000~~
~~4B~~	~~O~~	~~20,000~~
6	~~HAZ WASTE~~ OW	62,000
7	W	22,000
8	W	22,000
9	W	23,000
10	O	4,800
12	O	7,800
14	O	9,750
16	O	16,075
17	VIRGIN FUELS	1,200
18	O	9,950
19	O	7,800
20	O	7,800
21	VIRGIN FUELS	8,000
22	O	7,800
23	O	9,950
24	O	15,000
25	O	15,000
26	O	15,000
27	O	15,700
30	W	500
31	W	10,000
32	W	12,000
33	W	12,000
34	W	12,000
35	W	10,000
35A	W	11,650
36	W	20,000
37	W	20,000
38	W	30,000
39	W	30,000
40	HEAT EXCHANGER	N/A
44	OIL SEPARATOR	10,000
45	DAF UNIT	2,000
45A	DAF INLET	1,000
47	CAUSTIC SODA HOLDING	4,200
50	HEAT EXCHANGER	N/A
51	O	15,000
52	O	15,000
53	O	85,000
54	O	19,000
55	O	9,750
56	O	20,000
60	S	12,000
61	S	8,000
62	S	8,000
70	S/OW	9,500
71	OW	6,500
72	OW	6,500
81	~~HAZWASTE~~ PCW	5,000
82	~~HAZWASTE~~ PCW	5,000
83	~~HAZ WASTE~~ OW	5,500
84	~~HAZ WASTE~~ OW	5,500
85	~~HAZ WASTE~~ OW	6,000
86	~~HAZ WASTE~~ OW	6,000
87	~~HAZ WASTE~~ OW	6,000
88	OW	6,000
89	S	10,000
90	S	10,000
91	OW	5,000
92	OW	5,000
93	S/OW	12,000
94	S/OW	12,000
95	S	4,000
96	S	4,000
97	FILTER PRECOAT	1,000
98	W	12,000
99	LIME SLURRY	1,000
101	O	6,000

SCHEDULE OF PROPOSED TANKS

No.	NAME/USE	CAPACITY
102	OW	14,000
103	OW	14,000
104	OW	14,000
105	OW	14,000
106	OW	14,000
107	OW	14,000
108	OW	14,000
109	OW	14,000

TANK LEGEND

O	–	OIL MANAGEMENT UNIT
OW	–	OILY WATER
PCW	–	PETROLEUM CONTACT WATER
S	–	SLUDGE OR SOLIDS
W	–	WATER

NO	DATE	BY	REVISION DESCRIPTION
7	9/13/12	JZ	REMOVED TANKS 3A, 3B, 4A, 4B ADDED TANKS 102–109
6	10/05/05	WF	REMOVED TANK 48, NEW TANKS 17 & 35A
5	12/9/04	JZ	REMOVED TANKS 45 & 46, NEW TANK 45
4	4/1/03	JZ	REVISED TANK 11, 15, 16, 17, 18, 18a, 20, 28.
3	4/1/03	JZ	REVISED TANK 11 AS TANK 101 DELETED TANK 11
2	12/27/02	JZ	RELABELED TANKS 6, 38, 39, 81 & 82, DELETED TANK 29
1	11/1/02	JZ	REMOVED TANKS 12, 13, 14, 15, 16, 17, 18 & 20 ADDED TANKS 11, 12, 13, 14, 15, 16, 17, 18, 18a 20, 28 & 29

DESG ——— DRWN ——— CHKD ——— APRV 9/13/12 DATE

MITTAUER & ASSOCIATES, INC.
CONSULTING ENGINEERS
580-1 WELLS ROAD, ORANGE PARK, FLORIDA 32073
TEL. (904) 278-0030 FAX. (904) 278-0840
FLORIDA CA NO. 6569

LIQUID ENVIROMENTAL SOLUTIONS OF FLORIDA, LLC
Used Oil Processing Facility Permit
Proposed Topographic Map
Jacksonville, Florida

JOB NO. 9122–34–1
SHEET NO. B–3d

JOSEPH A. MITTAUER LICENSE No. 23111 STATE OF FLORIDA PROFESSIONAL ENGINEER

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C. OPERATING INFORMATION

3. Description of facility operation.

Liquid Environmental Solutions of Florida, LLC (LES) processes industrial wastewater and recovers hydrocarbons associated with this material. Typically, hydrocarbon recovery represents about 5% of the total volume of material received.

LES accepts only non-hazardous, non-biological industrial wastewater, primarily from the following sources: petroleum contact water (PCW) consisting almost entirely of gasoline/diesel/water mixtures from petroleum storage facilities; industrial process wastewater; landfill leachate; wastewater from tank cleaning, transportation, and environmental remediation sources.

All prospective wastewater and wastewater/hydrocarbon mixtures are carefully examined before acceptance. LES requires material profile information and may require a sample for review prior to acceptance. In addition, LES lab personnel perform treatability studies to determine whether we can treat the proposed wastestream effectively.

Accepted wastewater is transported to the LES facility by common carriers, contract carriers, or customer arranged carriers. Virtually all material received at the LES facility is received in bulk quantities transported in tank trucks or vacuum trucks. LES handles drums of this material on an occasional basis. The waste is sampled before unloading to determine conformity with previously reviewed samples and waste profile information and to be sure the material passes screening tests. Accepted waste is then unloaded to specified tanks for treatment.

Treatment involves the following steps:

1. Separation of free oil and other hydrocarbons. Wastewater/hydrocarbon mixtures are pumped to specified tanks for either gravity or thermal separation. Separated wastewater is pre-treated, analyzed and discharged to the Jacksonville Electric Authority (JEA) publically owned treatment works (POTW). Hydrocarbons are routed to specified tanks for de-watering using gravity, heat, and/or de-emulsifying chemicals. Processed hydrocarbons are sold for energy recovery to end users or fuel blenders. Wastewater from used oil processing is returned to the wastewater-handling portion of the facility for further treatment and discharge to the POTW.

2. Wastewater is treated chemically using prescriptions developed by laboratory personnel. Typically, the chemical treatment involves pH adjustment, coagulation, and flocculation. The treated water is held for analysis, and then discharged to the JEA POTW at Buckman Street. The solids removed from the water are de-watered by filter press or centrifuge and sent off-site to an appropriate disposal facility.

LES employs twenty-five people at the Jacksonville plant: seven plant operators; three in the receiving/process lab; four in maintenance; two in administrative/customer service; one plant manager; one transportation manager and seven truck drivers.

C. OPERATING INFORMATION

4. Used oil process flow.

The attached plant diagram shows location and size of tanks used for management of used oil, PCW, and oily wastewater.

Incoming shipments of oily wastewater, PCW, or used oil are sampled and checked for acceptability at the receiving lab following the procedures set forth in the used oil analysis plan.

Acceptable loads are routed to specific tanks as follows:

1) Oily wastewater. This material is managed in Tanks 1 or 2 if the material is found to be compatible with other, similar material. It is routed to the cone bottom tanks if it requires segregated handling.

2) Used oil. Loads, which consist largely of used oil, are usually unloaded directly to one of the tanks in the oil processing portion of the facility.

3) PCW. Shipments received as PCW are unloaded to Tanks 81 and 82.

Processing involves the following:

1) Oily wastewater. Free oil is removed by phase separation and transferred to Tanks 4A, 4B or to the oil processing tanks. Wastewater is treated by dissolved air flotation, held in the discharge tanks, analyzed for various parameters as required by IDUP #019 (JEA) and discharged to the POTW.

Material requiring segregated treatment is managed in the cone bottom tanks. Treatment consists in the use of heat and/or chemicals to break emulsions. Treated water is transferred to discharge holding tanks for analysis and discharge. Oil is transferred to the oil management tanks for further processing. Solids are transferred to holding tanks for evaluation and de-watering, primarily by filter press and occasionally by centrifuge.

2) PCW. Product is phase separated, transferred to the oil processing tanks and sent off-site for energy recovery either separately or as a blend with processed used oil. Water associated with product is treated as necessary, held, analyzed and discharged to the POTW.

3) Used Oil. Used oil and used oil associated with wastewater are routed to the oil processing portion of the facility either directly, or through the intermediate holding tanks identified above. The oil is staged in Tanks 10, 12, 14, 18, 19, 20, 21, 22, 23 51, 52, and 53. Samples are taken to determine characteristics of the oil including water content, solids levels, viscosity, and any other factors affecting treatment. Bench testing may be done to determine the most effective treatment. Once a treatment has been selected, the oil is transferred to Tank 16 where it is

heated to 180 degrees Fahrenheit, agitated, and treated with de-emulsifying chemicals. The treated oil is then transferred to cool-down tanks 24, 25, 26, or 27, and held for two to four days. During that period, a water break occurs. The water is transferred to the cone bottom tanks for further treatment, if necessary, and eventual discharge to the POTW. The treated oil is then combined with other oil to make a batch of approximately 13,000 gallons or more in tanks 54, 55, and 56. Samples are taken of the batch of treated oil. These samples are sent to an outside lab where they are tested for arsenic, cadmium, lead, and chromium. These analyses may be performed in-house at the discretion of the Laboratory Manager. Once the analytical results are received, the oil is ready for shipment to end users or other used oil processors. Each batch is assigned a lot number for tracking purposes.

LES primarily handles bulk loads of oily water, used oil, and PCW. However, we occasionally handle drum quantities of these materials. The drums are staged at a designated point within the contained portion of the plant. Each set of drums is evaluated for acceptability pursuant to the used oil analysis plan. The drums are pumped off to oily water tanks, used oil tanks, or the solids holding tanks where the material is managed along with similar material from bulk loads. The empty drums are cleaned and either recycled or scrapped. LES is also considered a used oil transport and transfer facility.

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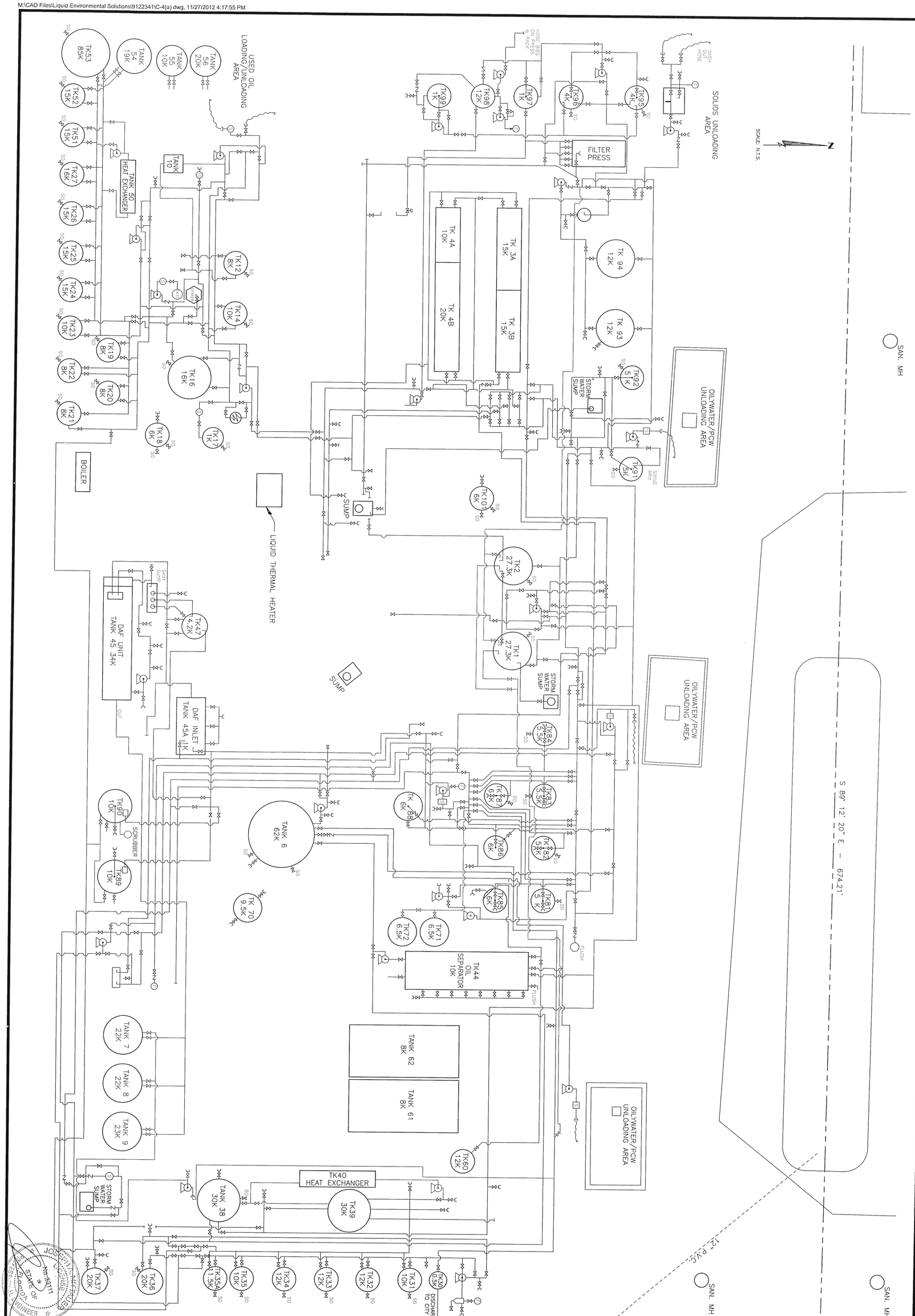


JOSEPH A. MITTAUER
No. 9411
STATE OF FLORIDA
REGISTERED PROFESSIONAL ENGINEER

DEC 10 2012

C-4a

JOB NO. 9122-34-1
ATTACHMENT

LIQUID ENVIRONMENTAL SOLUTIONS
Used Oil Processing Facility Permit
General Piping Schematic
Jacksonville, Florida

MITTAUER & ASSOCIATES, INC.
CONSULTING ENGINEERS
580-1 WELLS ROAD, ORANGE PARK, FLORIDA 32073
TEL. (904) 278-0030 FAX. (904) 278-0840 FLORIDA LICENSE EB-6569

DESG	KAL
DRWN	JPZ
CHKD	KAL
APRV	JAM
DATE	SEPT. 2012

NO	DATE	BY	REVISION DESCRIPTION

C. OPERATING INFORMATION

5. Analysis Plan.

The LES Used Oil Analysis Plan is attached. Included within the plan are sections covering the management of residues, used oil and PCW acceptance, and the tracking system for used oil.

USED OIL ANALYSIS PLAN

Liquid Environmental Solutions of Florida, LLC (LES)

1640 Talleyrand Avenue
Jacksonville, Florida 32206

TABLE OF CONTENTS

1.0 INTRODUCTION

This plan is intended for compliance with the requirements of 40 CFR § 279.55 and Chapter 62-710, F.A.C. This plan covers all used oil received, processed, and marketed by Liquid Environmental Solutions of Florida, LLC (LES). LES engages in transactions involving used oil, off-specification used oil fuel and on-specification used oil fuel.

This plan also covers the management of Petroleum Contact Water (PCW). The procedures covered by this plan are designed to comply with the requirements of Chapter 62-740, F.A.C.

LES has complied with the notification requirements of RCRA section 3010. LES' USEPA ID number is FLD981928484.

2.0 USED OIL ACCEPTANCE

2.1. Used Oil Acceptance Protocol

LES processes used oil and oily wastes generated by a wide variety of marine and industrial sources. Since there is a high degree of variability among these different sources, LES employs a combination of both process knowledge and sample analyses of halogen content to comply with the analysis requirements of 40 CFR § 279.53. However, at a minimum, LES samples and screens each used oil or oily waste shipment for Total Organic Halogens (TOH) using EPA Method 9077 (Dexsil Chlor-D-Tect). No hazardous wastes or hazardous waste fuels are accepted by LES.

LES is occasionally engaged in transportation of Used Oil from generator sites to the LES plant. In doing so, LES does not pick up and transport any Used Oil from multiple generators on the same truck. When accepting Used Oil for processing from a third party transporter, LES does not accept Used Oil from multiple generators on the same manifest.

Before any oil or oily waste is accepted by LES, the generator must complete a Material Profile Form (MPF). The MPF is a document that provides LES with the generator's name, name of the material, volume, process generating the material, the characteristics of the material, if the material is or has been mixed with a hazardous waste, and a generator's certification. Generators may provide their own analyses, LES may have analyses performed by an outside laboratory, the LES Laboratory may perform in-house analyses or any combination of these will be used to support the generator's determination of the regulatory status of the material destined for LES. Samples accompany the MPF in some instances. The LES Laboratory makes the determination whether or not wastes or materials are acceptable under the permits issued to the facility. Once the LES Laboratory has approved the MPF, the generator is granted approval to deliver the material to the LES facility. As each shipment of

used oil or oily waste arrives at the facility, it is sampled at a vehicle staging area outside the LES Receiving Station. Receiving Station Personnel perform a visual inspection of the load and, depending on the physical nature of the load, select an appropriate sampling technique. A coliwasa is usually employed for bulk or drum sampling. A dipper or equivalent device may be used where the material is judged to be homogenous. At this point receiving personnel match the sample from the load to the initial profile. Each sample is screened using EPA Method 9077 at a minimum. No shipment is allowed to be offloaded until it is determined that the TOH content does not exceed 1,000 ppm, or in the case of materials exceeding that limit, the presumption that the used oil has been mixed with hazardous waste has been successfully rebutted and that it matches the initial profile. Oil and oily waste destined for LES that fails to meet the acceptable criteria are refused according to the procedure outlined in Section 2.4.

Parameters other than TOH may be analyzed at the laboratory's discretion for quality control purposes and assurance that no hazardous waste is accepted. All data recorded by laboratory personnel on incoming shipments of used oil and oily waste are entered in a Receiving Document Database (RecvDoc), referenced by generator name, manifest number, and date. Waste or materials received in drums or totes will be managed in the same manner. If other regulated compounds are expected to be present, samples of the oily waste will be sent to an outside laboratory to be analyzed. The oil or oily waste will not be unloaded until the LES Laboratory is satisfied that the material is not a hazardous waste or hazardous waste fuel. Approved EPA methods found in SW-846 are used.

The parameters applicable to oily waste acceptance that the LES Laboratory has the ability to perform onsite are listed in the table below.

Parameter	Method
pH	EPA 150.1
Flash Point	EPA 1010
TOH	EPA 9077
Metals (except Mercury)	EPA 6010

2.2 Rebuttable Presumption

Where TOH values exceed 1,000 ppm, it remains the responsibility of the generator of the presumed hazardous waste/used oil mixture to rebut the presumption. However, LES personnel will assist clients in this process through a number of means, including the gathering and analysis of process knowledge, sample preparation techniques, in-house laboratory analyses, and outside laboratory analyses.

2.2.1 Process Knowledge

Process knowledge alone may be sufficient to rebut the presumption if it is sufficiently well documented. Usually, process knowledge is used as a basis for determining the type(s) and scope of analytical testing to perform in order to rebut the presumption.

In the case of a chlorinated paraffin or other compounds not on the Appendix VIII list (40 CFR Part 261), it may be possible for the generator to demonstrate that the measured TOH level is due solely to the presence of the non-Appendix VIII compound based on process knowledge alone. LES may elect to accept and process mixtures of used oil and conditionally exempt small quantity generator's waste as referenced in 40 CFR 261.5(j) and 40 CFR 279.10 (b)(3). In any case, process knowledge serves to reduce the scope of analytical testing required to rebut the presumption by ruling out potential sources of contamination by Appendix VIII compounds.

2.2.2 Sample Preparation

Many TOH analysis techniques rely on the conversion of organically bound halogens to free halides with subsequent quantification of the free halide content by titration. The amount of free halide measured is then used to calculate the amount of organically bound halogens originally present.

Much of the used oil and oily waste brought to LES is derived from maritime sources and is likely to contain various concentrations of seawater. Since seawater contains a relatively high concentration of free halide (specifically, chloride), analysis of seawater-contaminated oil by many common techniques will yield falsely high values (false positives) for TOH. EPA Method 9077, the method employed by LES for used oil TOH analysis, will yield false positives with seawater-contaminated materials. Therefore, where process knowledge indicates free halide contamination, it is necessary to prepare the sample in order to remove as much of the contaminant as possible prior to analysis.

LES has developed a Standard Operating Procedure (SOP) for performing this sample preparation technique, which involves extracting the free halides with purified water after diluting the sample with iso-octane. Care must be taken through quality control measures to insure that the sample preparation technique does not unintentionally remove significant quantities of any organically bound halogens. This may be checked by comparing an analysis of the prepared sample with an analysis of a control sample containing a known concentration of a halogenated organic compound.

2.2.3 In-house Laboratory Analyses

LES employs EPA Method 9077 (Dexsil, Chlor-D-Tect) for all in-house TOH analyses. This technique has been proven by experience to correlate well with analytical techniques involving elaborate equipment and time-consuming methods. The method relies on the use of metallic sodium to strip organically bound halogens from the hydrocarbon molecule and convert them to free halides. The free halides are subsequently titrated using a mercuric compound to an end-point denoted by a colorimetric indicator. The amount of the mercuric compound consumed is proportional to the amount of free halide present which, in turn, is proportional to the amount of organically bound halogens originally present in the sample. The test yields virtually no false negatives but can yield false positives where there is free halide contamination of the sample (e.g. seawater). Thus, the method is suited to the screening of samples for regulatory purposes as it is unlikely to allow true hazardous waste contamination to go undetected.

2.2.4 Outside Laboratory Analyses

Occasionally, the presumption may be rebutted only through qualitative and quantitative analyses. For these procedures, LES employs an outside laboratory to perform EPA 8260. This data is then used to determine the presence or absence of halogenated compound on the Appendix VIII list. A 100-ppm threshold is used to determine the presence of a compound. In other words, a level of 100 ppm or greater is taken as evidence that the used oil is contaminated with the compound in question.

2.3 Acceptance Records

LES maintains records of each used oil shipment accepted for processing. These records consist of entries in a computer database in conjunction with filed copies of invoices, manifests, bills of lading, and other shipping documents. The following information is recorded for each load of used oil accepted:

(1) The name and address of the transporter who delivers the used oil;
(2) The name and address of the generator or processor/re-refiner from which the used oil was sent;
(3) The EPA identification number of the transporter who delivered the used oil;
(4) The EPA identification number (if applicable) of the generator or processor from whom the used oil was sent;
(5) The quantity of used oil accepted;
(6) The type of oil accepted (per 62-710.510(1)(c), F.A.C.); and
(7) The date of acceptance.

The above records will be maintained on-site and available for inspection for at least three years.

2.4 Used Oil Refusal Procedure

In response to screening procedures by LES Laboratory Personnel, or for other reasons, a load of used oil arriving at the LES facility may be refused (for example, when the presumption that the used oil has been mixed with a hazardous waste cannot be satisfactorily rebutted). When a load of used oil is refused, LES Laboratory personnel will immediately inform Processing personnel that the used oil is not to be off-loaded. LES Laboratory personnel will then inform the appropriate LES Account Manager, regarding the status of the load. If the appropriate Account Manager is not available, the LES Sales Manager will be contacted. Once a member of the LES Sales Department has been alerted, the representative will contact the customer as soon as possible to convey the information that the load has been refused for acceptance by LES.

3.0 USED OIL EXPORT

3.1 Off-specification Used Oil

As a marketer of used oil, LES maintains a record of each shipment of used oil originating from its facility to used oil burners. These records take the form of a computer database in conjunction with filed hard copies of invoices, manifests, bills of lading, and other shipping documents.

LES records or may cross-reference the following information on each shipment of off-specification used oil:

(1) The name and address of the transporter who delivers the off-specification used oil to the recipient;
(2) The name and address of the recipient of the off-specification used oil;
(3) The EPA identification number of the transporter who delivers the off-specification used oil to the recipient;
(4) The EPA identification number of the recipient;
(5) The quantity of off-specification used oil shipped;
(6) The end use of the oil (per 62-710.510(1)(e), F.A.C.); and
(7) The date of the shipment.

LES will only ship off-specification used oil to recipients who have notified the EPA of their activities according to the requirements of RCRA section 3010 and who possess an EPA identification number.

3.2 On-specification Used Oil Fuel

This section documents the policies and procedures employed by LES to meet the requirements of 40 CFR Part 279 Subpart H - "Standards for Used Oil Fuel Marketers" § 279.72, "On-specification used oil fuel".

Sample analyses are used to make specification determinations. The sampling method used for drums, tanks, or bulk loads are by coliwasa, or grab samples from an agitated (homogenous) tank.

Used oil is processed by LES in production lots; each is assigned a unique Oil Production Lot (OPL) number automatically by the OPL database. A completed OPL is sequestered in an individual storage tank prior to shipment off-site. LES analyzes oil production lots according to the following schedule:

METHOD	PARAMETER	SITE	FREQUENCY
EPA 6010	Metals	on	each batch sent to a burner
ASTM D93	Flash Point	on	each batch
EPA 9077	TOH	on	each batch
EPA 8080	PCB's	off	quarterly

Each OPL is analyzed according to the destination of the material. Each OPL destined for a burner will be analyzed for metals. OPL destined for other used oil processors or marketers will be analyzed at the discretion of the Laboratory Manager. OPL destined for other used oil processors or marketers will be deemed off-specification unless metals data is available to support an on-specification determination.

LES records or may cross-reference the following information on each shipment of on-specification used oil fuel:

(1) The name and address of the transporter who delivers the on-specification used oil to the recipient;
(2) The name and address of the recipient of the on-specification used oil;
(3) The EPA identification number of the transporter who delivers the on-specification used oil to the recipient;
(4) The EPA identification number of the recipient;
(5) The quantity of on-specification used oil shipped;
(6) The end use of the oil (per 62-710.510(1)(e), F.A.C.);
(7) The date of the shipment; and
(8) A cross-reference to the record of used oil analysis or other information used to make the determination that the oil meets the specification as required under § 279.72(a). As described above, this cross-reference consists of recording the oil production lot number on the appropriate shipping document(s).

The Used Oil export records will be maintained on-site and available for inspection for at least three years.

3.3 Additional Used Oil Analyses

Other used oil analyses are performed by LES for quality control purposes according to the following schedule:

METHOD	PARAMETER	FREQUENCY
ASTM D-95	% Water	each batch
ASTM D-4294/EPA 6010	% Sulfur	as required
ASTM D-1298	API Gravity	as required

These additional quality control tests may be performed either on-site or off-site at the discretion of the Laboratory Manager.

4.0 PCW ACCEPTANCE

LES accepts and processes PCW in compliance with the requirements of Chapter 62-740, F.A.C. Before any PCW is accepted by LES, the generator must complete a Material Profile Form (MPF). Included in this form is a written certification by the generator that that the PCW does not contain levels of hazardous constituents above those found in the source of the PCW.

As each shipment of PCW arrives at the facility, it is sampled and analyzed to ensure the waste load matches the approved MPF. The finger print analysis includes the pH testing for the water phase and the TOH and Flash Point testing for the recoverable product phase. Solids from tank cleaning operations are not accepted as PCW.

LES does not mix or commingle PCW with any other material when accepting waste for transportation to the LES facility. When accepting material for processing from a third party transporter, LES does not accept PCW commingled with any other material not defined as PCW.

LES maintains records for each shipment of PCW received including the following:

(1) Name and address of the PCW generator.
(2) Name and address of the PCW transporter.
(3) Date of receipt of the PCW shipment.
(4) Volume of the PCW received.
(5) A copy of the manifest used for transportation of the PCW.

The PCW records will be maintained on-site and available for inspection for at least three years.

APPENDIX A

HANDLING CONTAMINATED MEDIA AND RESIDUES

HANDLING CONTAMINATED MEDIA AND RESIDUES

At the LES facility, oil contaminated media and residues fall into four categories: tank bottom solids, shaker solids and strainer basket debris, oil contaminated media and disposable items and other oil contaminated items such as non-disposable tools and equipment.

A.1 Tank Bottom Solids

LES manages its used oil operations to minimize the accumulation of tank bottom solids. However, it is conceivable that tank bottom solids might accumulate to a depth that could have an adverse impact on tank usefulness. If this should occur, at the discretion of the General Manager, the tank will be drained and the bottom solids pumped or otherwise removed to a suitable container. Should confined space entry be required to accomplish this task, a commercial tank-cleaning contractor may be employed.

Once the tank bottom solids have been removed, LES will attempt to reclaim as much oil as possible through various treatment methods including, but not necessarily limited to, heating, shaking, sieving, centrifugation, pressing, washing, and extraction. Reclaimed oil will be returned to processing.

Oil contaminated solids will usually be rich in BTU value and may be burned as fuel. Analytical testing establishing the tank bottom solids' suitability as fuel will be undertaken as specified by the prospective burner.

The solids generated at the plant and destined for disposal are randomly sampled twice per quarter and analyzed by an independent laboratory to determine if the material exhibits any characteristics of hazardous waste identified in Subpart C of 40 CFR Part 261. The samples are analyzed for the TCLP Metals, EPA Methods 6010 and 7470, and TCLP Organics, EPA Methods 8260 and 8270. Depending on the outcome of the analyses, the material will be disposed of at an appropriate hazardous waste or non-hazardous waste disposal facility.

A.2 Shaker Solids and Strainer Basket Debris

Strainer baskets catch debris as it is being pumped and thereby protect pumps from damage. A shaker is also employed to remove solids from oil. Every attempt is made to reclaim as much free oil from these materials as is possible. The remaining material will then be classified according to the nature of the substrate and a determination made as to the proper management pathway.

As described above, such materials may be suitable for use as fuel to recover energy. If this management pathway is selected, analytical testing to establish the material's suitability as fuel will be undertaken as specified by the prospective burner. If the oil contaminated materials must be disposed of as a waste, a sample will be analyzed by an independent laboratory to determine if the material exhibits any characteristics of

hazardous waste identified in Subpart C of 40 CFR Part 261. Depending on the outcome of the analyses, the material will be disposed of at an appropriate hazardous waste or non-hazardous waste disposal facility.

A.3 Contaminated Media and Disposable Items

Absorbent media such as clay, pads, booms, and disposable personal protective equipment will be treated to reclaim absorbed oil. Such treatment methods may include, but are not necessarily limited to heating, sieving, centrifugation, pressing, washing, and extraction. When all reclaimable oil has been removed the media will be placed into a covered accumulation drum labeled "Oily Waste". When this drum is filled, its contents will be sampled and analyzed by an independent laboratory to determine if the material exhibits any characteristics of hazardous waste identified in Subpart C of 40 CFR Part 261. Depending on the outcome of the analyses, the material will be disposed of at an appropriate hazardous waste or non-hazardous waste disposal facility.

A.4 Other Oil Contaminated Materials

Reusable items such as non-disposable personal protective equipment, tools, and equipment will be washed with detergent and water to remove oil. Free oil will be decanted or otherwise separated and returned to used oil processing. The rinseate will be treated to meet City of Jacksonville industrial user permit standards and discharged to the sanitary sewer.

C. OPERATING INFORMATION

6. & 7. Preparedness and Prevention.

A copy of the LES SPCC Plan is attached. The LES Contingency Plan is included as an appendix to the plan.

The LES facility is operated and maintained to minimize the possibility of a fire, explosion, or other unplanned release of any pollutant or potentially hazardous material. All plant and lab personnel are trained for emergency response, fire control, first aid, and routine operating procedures. Operators and maintenance personnel clean the plant routinely. A meeting is held every morning to discuss operating and maintenance matters. In preparation for this meeting, all tanks are inventoried, maintenance items listed, and corrective action planned.

a) The LES plant is equipped with an alarm device and a paging system, which will be activated in the event of an emergency.

b) Phones are located at several points around the plant where they are immediately available for emergency response.

c) Fire extinguishers are located throughout the plant. Spill control equipment is located in the spill response shed at the east end of the facility.

d) A high-pressure water system runs throughout the facility and is available for emergency purposes.

e) Emergency response systems and materials are inspected at least monthly.

f) All operating personnel have either direct contact or two-way radio contact with other plant personnel at all times.

g) The phone system is available at all times for emergency response needs.

h) Proper aisle space is maintained at all times in the vicinity of tanks and containers.

I) All local authorities have received a copy of the latest approved SPCC plan and will receive any revised plan.

j) Corrective actions taken in response to spills/leaks will be recorded as required in the pertinent regulations.

SPILL PREVENTION, CONTROL AND COUNTERMEASURE PLAN

liquid
ENVIRONMENTAL SOLUTIONS

1640 Talleyrand Avenue
Jacksonville, Florida 32206

Prepared by:

MITTAUER & ASSOCIATES, INC.
CONSULTING ENGINEERS
CERTIFICATE OF AUTHORIZATION NO. 6569

Orange Park, Florida
Project No. 9122-32-1
June 1, 2011

SPILL PREVENTION, CONTROL AND COUNTERMEASURE PLAN

Liquid Environmental Solutions of Florida, LLC (LES)

Physical Address:

1640 Talleyrand Avenue
Jacksonville, Florida 32206

Mailing Address:

1640 Talleyrand Avenue
Jacksonville, Florida 32206

TABLE OF CONTENTS

1.0 BASIC INFORMATION

BASIC INFORMATION

LOCATION:	Talleyrand Avenue and Seventh Street, Duval County, Florida
TYPE OF FACILITY:	Industrial wastewater pretreatment and hydrocarbon recycling
FACILITY ADDRESS:	1640 Talleyrand Avenue, Jacksonville, Florida 32206
RIVER BASIN:	St. Johns River
DESIGNATED FACILITY CONTACT:	Process Supervisor
ALTERNATE FACILITY CONTACT:	Plant Manager

EMERGENCY ACTION

In the event of a spill or leak from any tank or pipe, the senior responsible person at the site should carry out the following actions until he is relieved by someone with higher authority.

SAFETY FIRST

Take all actions necessary to protect the life and health of all persons in the area.

CALL FOR HELP

Notify local emergency authorities (fire, police, ambulance) as necessary. Call Liquid Environmental Solutions of Florida (LES) management and notify them of the situation.

STOP THE LEAK

Take actions to stop the flow of liquid if such can be done safely.

NOTIFY REGULATORY AGENCIES

In the event of a potentially dangerous situation, call the federal and state hotlines immediately to report the spill. If the situation is under control, fill out the questions on the spill form in Section 14 of this plan prior to calling the regulatory agencies. The information on the spill form is what the agencies will want to know.

2.0 PURPOSE

PURPOSE

The Federal Water Pollution Control Act (FWPCA) Amendments of 1972 required the administrator of the Environmental Protection Agency (EPA) to prevent, reduce or eliminate pollution of the navigable waters of the United States. On December 11, 1973, the EPA published regulations for the prevention of pollution of these waters by oil emanating from non-transportation related on-shore and off-shore facilities which store, use, or transfer oil. The National Oil Spill Prevention, Control, and Countermeasures (SPCC) Program became effective on January 10, 1974, under the authority of Section 311 of the 1970 Federal Water Pollution Control Act, as amended, (33 U.S.C. 1251 et seq.), also known as the Clean Water Act (CWA). The regulations are codified in Title 40, Code of Federal Regulations, Part 112 (40 CFR 112). "Oil Pollution Prevention-Non-Transportation related On-Shore and Off-shore Facilities".

The regulations require, among other things, the preparation and implementation of a Spill Prevention Control and Countermeasure (SPCC) Plan for all applicable non-transportation related facilities, which could reasonably be expected to discharge a harmful quantity of oil into or upon navigable waters of the United States or their adjoining shorelines.

The Purpose of the SPCC Plan includes the means to identify and describe the potential sources of spills, the facilities and procedures utilized to prevent a spill, and the control and cleanup procedures used by facility personnel. Proper implementation of the plan will reduce the spill potential and minimize the adverse consequences a spill might have on the environment.

3.0 AVAILABILITY OF SPCC PLAN

SPCC PLAN AVAILABILITY

As required by law and to be of use in an emergency situation, complete copies of the Plan are maintained in the following locations:

LOCATION	CONTACT
Administrative Office	Plant Manager
Process Supervisor's Office	Process Supervisor
Laboratory	Laboratory Manager

4.0 CERTIFICATION, REVIEW AND AMENDMENTS

CERTIFICATION, REVIEW AND AMENDMENTS

Management Responsibility/Approval

In accordance with 40 CFR 112.7, the responsibility for spill prevention, control, and countermeasures has been placed with the Process Supervisor and, in his absence, the Plant Manager.

By signature, the above management personnel certify that they have approved this SPCC Plan and have the authority to commit the resources required for its implementation:

Signed: _____

Signed: _____

Certification of Original Plan

Having examined the LES facility located at 1640 Talleyrand Avenue, Jacksonville, Florida, and being familiar with provisions of the Code of Federal Regulations Title 40, Chapter 1, Subchapter D Part 112, I certify that this SPCC Plan satisfies the requirements of 40 CFR Part 112 and has been prepared in accordance with good engineering practices.

Signed: _____

Licensed Professional Engineer

Registration #: 23111

Date: DEC 10 2012

Review and Certification Due: June 1, 2014

Amendments

1. Review Engineer

Name: _____ Affiliation: _____

Signed: _____ Registration #: _____

Address: _____ Date: _____

_____

2. Review Engineer

Name: _____ Affiliation: _____

Signed: _____ Registration #: _____

Address: _____ Date: _____

_____

3. Review Engineer

Name: _____ Affiliation: _____

Signed: _____ Registration #: _____

Address: _____ Date: _____

_____

4. Review Engineer

Name: _____ Affiliation: _____

Signed: _____ Registration #: _____

Address: _____ Date: _____

_____

Amendment by Owners / Operators

This SPCC Plan will be reviewed as required by law or when engineering or operational changes occur. It will be updated regularly with regard to names and telephone numbers. If significant changes in the facility are made that substantially affect this Contingency Plan, then this plan will be updated as soon as practicable or within six months. Minor changes in the facility affecting this plan should be recorded and filed with this plan, and should be incorporated in the Plan at the three year update. Any amendment will be inspected and certified by a registered professional engineer.

Amendment By Regional Administrator

If a spill event occurs resulting in the release of greater than 1,000 gallons to a navigable water or adjoining shoreline in a single spill or event, or discharge of harmful quantities to navigable water or adjoining shorelines occurs, a written report is required to be submitted to the Regional Administrator within 60 days (see Section 8, "Notification and Response Procedures"). Upon receipt of this report the Regional Administrator may require the owner or operator to amend the SPCC Plan, if he finds that the plan does not meet the requirements of Part 112, or that the amendment is necessary to prevent and contain discharges of oil from the facility. When the Regional Administrator proposes to require an amendment, he shall notify the facility operator and specify the terms. The facility owner or operator shall respond within 30 days of receipt of notice and submit written information regarding the amendment notice.

5.0 SPILL HISTORY

SPILL HISTORY

Since LES, Jacksonville Facility has been in operation (November, 1986), there have been no reportable spills of oil released from within the confines of the facility.

If a spill should occur, this SPCC Plan will be amended to include a written description of the spill, the corrective action taken and a plan for preventing recurrence of a spill.

6.0 FACILITY DESCRIPTION

FACILITY DESCRIPTION

Liquid Environmental Solutions (LES) is an industrial wastewater pretreatment facility located at 1640 Talleyrand Avenue near the intersection of Talleyrand and 7th Street. The size of the facility is approximately 1.6 acres and the facility operates according to the following schedule:

Mon.— Fri.	7:00 a.m.— 11:00 p.m.
Sat.	7:00 a.m.— 7:00 p.m.

A site location map and site plan drawing are located in Section 13 of this plan.

LES accepts petroleum contaminated industrial wastewater and used oil from marine, petroleum, environmental and industrial sources. Oil is separated from oily wastewater by physical, mechanical, and chemical means and subsequently processed at a designated section of the LES facility, the Oil Dock, for marketing as used oil fuel. Wastewaters are then treated by various techniques including gravity separation, dissolved air floatation, heat treatment, and chemical batch treatment to meet JEA discharge permit standards and discharged to the Buckman Wastewater Treatment Facility. The Oil Dock area consists of 21 storage tanks and one treatment tank with a total oil storage capacity of 315,375 gallons. Tanks designated as wastewater storage tanks comprise a total volume of approximately 758,215 gallons.

There is no long-term storage of any material at LES. As a recycler of used oil, it is the policy of LES to separate this material as quickly as possible, refine it, and market it for use as fuel. Wastewater is also treated as soon as can feasibly be scheduled and once the effluent can be shown to meet the requirements of the discharge permit, it is discharged to the Buckman Wastewater Treatment Facility. A small stock of treatment chemicals is kept on hand to meet ongoing treatment needs.

Drainage

Stormwater from the facility is contained within the facility by berms, concrete filled block walls, and a concrete slab barrier. Stormwater is contained and drains to a sump located in the southeast corner of the facility that transfers the stormwater to an Oil Separator (Tank 44); from there it is treated and discharged to the Buckman Wastewater Treatment Facility.

A drainage ditch runs along the perimeter of the north end of LES. It flows into a ditch that runs along the east side of the property. This ditch empties into a concrete paved ditch at the southwest corner of the LES property. The concrete paved ditch flows east from that point and ultimately empties into the St. Johns River.

OIL STORAGE TANK LIST

TANK NO.	CAPACITY (gallons)	USE
10	4,800	Oil/Solids
12	7,800	Specialty Oil
14	9,750	Low Flash Diesel
16	16,075	Heating Oil
17	1,200	Diesel
18	9,950	Low Flash Diesel
19	7,800	Low Flash Diesel
20	7,800	Low Flash Diesel
21	8,000	Low Flash Diesel
22	7,800	Low Flash Diesel
23	9,950	Low Flash Diesel
24	15,000	Cooldown Staging Area
25	15,000	Cooldown Staging Area
26	15,000	Cooldown Staging Area
27	15,700	Cooldown Staging Area
51	15,000	Raw Oil
52	15,000	Raw Oil
53	85,000	Raw Oil
54	19,000	Retail Oil
55	9,750	Retail Oil
56	20,000	Retail Oil
TOTAL: 21 Tanks	**315,375**	

7.0 POTENTIAL SPILL SOURCES,

CONTAINMENT & CONTROL EQUIPMENT

POTENTIAL SPILL SOURCES, CONTAINMENT, & CONTROL EQUIPMENT

Potential Spill Sources

Potential spill hazards identified at the LES facility include releases due to accidents, equipment failure releases, or overflows from aboveground treatment and storage tanks for wastewater and waste oil. All ancillary equipment in conjunction with these tanks such as pipes, pumps and valves are also potential spill sources. Another potential spill source is from the loading/unloading of tankers at the designated off-loading sites. Potential spill sources have been thus categorized:

Area 1 - Bulk storage for oil and wastewater

Area 2 - Truck loading and offloading

Each area that has been identified as a potential spill source, and the maximum total quantity of material which could be discharged at one time as a result of a major failure is listed below.

Area 1 - 85,000 gallons (Tank 53)

Area 2 - 7,000 gallons (fully loaded tanker)

Containment and Diversionary Structures

The LES facility has been designated and constructed for maximum containment to prevent any discharge from reaching a navigable water course.

The entire facility has been designed and constructed for complete containment safety and is fully lined with concrete. Tanks 3, 4 and the oil dock lie at the high end of the plant. Berms to the west and north of tanks 3 and 4 serve to contain and redirect potential spills toward the system of moats and dikes found within the perimeter containment wall. The Oil Dock is set within a walled enclosure which drains to a sump at a lower point within the plant.

The walled enclosure has been calculated to be of sufficient volume to contain the largest storage tank (85,000 gallons), and provide for sufficient freeboard to allow for precipitation. The walled enclosure and concrete slab barrier is sufficiently impervious to allow for containment of spilled material.

The truck loading/off-loading areas are bordered by curbs. At the center of each loading/off-loading area are drains which flow to a sump within the plant. These areas are designed to contain minimal amounts of spillage which may occur during hose changing. In the unlikely event a tanker developed a major leak, the containment curbing would be supplemented with sandbags, sorbent booms, and pads as necessary to stop the flow of oil. Appropriate control measures would then be implemented depending on the magnitude of the spill.

Spill Control Equipment

The following spill control materials are kept in the spill shed and inventoried every two months for replacement of items consumed in minor cleanup jobs; the entire inventory will be restocked as soon as possible following a major spill event:

TYPE OF EQUIPMENT	QUANTITY	AREA STORED
Sorbent Pads	100	Spill Shed
Pounds of Kitty Litter	100	" "
Pair of Tyvek Coveralls	6	" "
Pair of Splash Goggles	6	" "
Pair of PVC Gloves	6	" "
Pair of Large Over Shoes	1	" "
Poly Bags	10	" "
Filled Sand Bags	20	" "
Hazardous Waste Labels	10	" "
Squeegies	2	" "
Shovel	2	" "
Rake	2	" "
Box of Rags	1	" "
Bung Wrench	1	" "
Roll of Plastic	1	" "
Soda Ash	50 lbs.	" "
85 gallon Overpack	1	" "

Five Gallon Pails	2	"	"
Pair of Channel Lock Pliers	1	"	"
Roll of pH paper	1	"	"
Roll of Barricade Tape	1	"	"
Danger Sign	2	"	"
Roll of Duct Tape	1	"	"
Blank copies of This Inventory	10	"	"
Flashlights	5	"	"

Equipment Specifications

The following table lists purposes and specifications of LES spill control equipment.

EQUIPMENT	PURPOSE	SPECIFICATIONS (where relevant)
Sorbent Booms	Diking , diversion, absorption	-
Absorbent Particulate	Absorption	-
Poly Bags	Package contaminated materials	chemically resistant
Sand Bags	Diking, diversion	-
Labels	Labeling contaminated materials	-
Squeegies	Spill cleanup	-
Shovel	Constructing emergency earthen berms or dikes, transferring contaminated soil or debris to container	-
Tyvek Coveralls	PPE, protect clothing and skin from spilled material	chemically resistant
Splash Goggles	PPE, protect eyes from spilled material	chemically resistant
Latex Gloves	PPE, protect hands from spilled material	impervious to liquids
Gorman Rupp pump at filter press	material transfer	200 gpm
3" diaphragm pump at filter press	material transfer	200 gpm
Gorman Rupp pump at classifier	material transfer	200 gpm
silver 3" portable diaphragm pump	material transfer	200 gpm
Rack #1 Gorman Rupp pump	material transfer	220 gpm
Gorman Rupp pump between Tanks #1 and #2	material transfer	200 gpm
Rack #3 Gorman Rupp	material transfer	200 gpm
Portable diaphragm pump	material transfer	200 gpm
Gorman Rupp at separator	material transfer	200 gpm
Gorman Rupp at Tank #6 for DAF influent	material transfer	200 gpm
Pond pump	material transfer	150 gpm
Gorman Rupp pump at Tank #9	material transfer	220 gpm
Submersible pump at pit	material transfer	180 gpm
Diaphragm pump for lime at press	material transfer	140 gpm
Submersible pump at Tank #5	material transfer	180 gpm
Plant Vacuum Truck 524	Material transfer	3,000-gal tank capacity

Heavy Equipment

LES has pumps and equipment that can be used for transferring spilled material to a suitable storage vessel. Refer to the table above for a listing of these items.

Personal Safety Equipment

Personal safety equipment is provided to all LES plant employees. Instruction on the proper use of this equipment is provided by the supervisors. Each employee is responsible for issued equipment and usually maintains this equipment at work stations or in personal lockers. Standard issue equipment includes protective gloves, safety glasses and ear plugs. Additional safety equipment available includes disposable clothing, non-disposable chemically resistant clothing, face shields, splash goggles, special purpose gloves, respirators (for suitably trained employees) and various other disposable coverings which are provided as needed and stored in the shop area.

Fire Fighting Equipment

Fire extinguishers of various types and capacities are located throughout the facility.

FIRE EXTINGUISHER INFORMATION

UNIT NUMBER	LOCATION	TYPE
1	Receiving Lab	ABC
2	Receiving Lab	ABC
3	Back Lab	ABC
4	Digestion Room	ABC
5	Maintenance Shop	ABC
6	Portable Welding Machine	ABC
7	Tk 95	ABC
8	Filter Press, upper level	ABC
9	Oil Dock Tk 27	Foam
10	Oil Dock Backside Tk 16	ABC
11	Stormwater Sump Pit 5	ABC
12	Hot Oil Boiler	ABC
13	DAF, ground level	ABC
14	DAF, upper level	ABC
15	Tk 38	ABC
16	Spill Shed, backside	ABC
17	Rack #4	ABC
18	Box 61/62, east side	Foam
19	Electric Shed, west side	ABC
20	Tk 81, upper level	ABC
21	Tk 87, upper level	ABC
22	Tk 84, ground level	ABC
23	Rack Shed	ABC
24	Admin Office	ABC
25	Spare, maintenance shop	ABC
26	Spare, maintenance shop	ABC

Equipment Suppliers and Emergency Response Contractors

This section lists telephone numbers of commercial sources for equipment, supplies and assistance that can be quickly obtained in the event of an emergency:

- Jacksonville Pollution Control, 355-4164
- Environmental Remediation Services, 791-9992

8.0 NOTIFICATION AND RESPONSE PROCEDURES

NOTIFICATION AND RESPONSE PROCEDURES

This section addresses the emergency countermeasures developed for the facility in the event that a spill or discharge of oil should occur. This countermeasure plan includes a description of responding facility personnel, their responsibilities and qualifications, the procedures to be followed in the event of a spill, and the role of local emergency response.

Facility Notification and Response Procedures

Should any oil spill occur, the person detecting the spill should:

1. Immediately notify the Process Supervisor. The Process Supervisor should attempt to provide initial containment of the spill, if the spill does not pose a harmful or unsafe situation. The Process Supervisor or his designee shall serve as the Spill Team Coordinator who is responsible for communication with, and coordination of all applicable personnel to insure proper response to a spill event. In order to provide adequate initial response, the Spill Team Coordinator shall begin by assessing the situation and implementing the following:

2. Verification of the type of spill, its exact location and quantities released.

3. Determine whether spilled material may reach the St. Johns River or adjoining shorelines, and whether initial containment efforts are adequate to prevent a release to the environment.

4. Establish cause of spill and time of occurrence.

5. Determine the presence or potential for injuries, fire, etc. and assess the need for additional safety or security measures.

6. Assess what cleanup and emergency procedures are to be taken.

7. Immediately activate the Spill Control Team, if needed.

8. Stop the source of the spill or leakage.

9. Assess the need for assistance. Request for outside assistance must be coordinated with management personnel.

10. Determine and record the exact type of material, approximate amount of spill, duration of discharge and cause of incident. Record the information on the Spill Report Form located in Section 14 of this Plan.

11. Complete proper cleanup and prepare for the disposal of the spilled material.

12. Report any spill event or potential spill to management personnel to ensure compliance with environmental regulations.

Major Spill Events

In response to major spill events which may pose significant danger to life or property, immediately notify the Fire Department and at least one of the following members of the LES Spill Control Team:

NAME	TITLE	CELL PHONE	HOME PHONE
* Keith Adams	Process Supervisor	(904) 509-2717	(904) 683-4596
Yuri Turovsky	Plant Manager	(904) 509-2032	(904) 886-7997
Ed Jesus	Division Manager	(904) 430-3847	

* Primary Emergency Response Coordinator

The above personnel will notify the Governing State and Federal regulatory agencies in the event the release goes beyond the confines of the facility boundaries.

- National Response Center: (800) 424-8802
- Florida Department of Environmental Protection: (904) 256-1700
- State Warning Point: (904) 413-9911 & (800) 320-0519

In case of a major spill that requires evacuation of the operating facility, take the following actions in order listed:

1. Sound the evacuation/emergency alarm located at the north side of DAF unit. Direct all personnel to leave the area.

2. If possible, contain and isolate the source of the spill to minimize the volume of material to be cleaned up.

3. Be prepared and standby for organized spill cleanup.

In the event that a discharge reaches the St. Johns River of such magnitude that water quality standards may be violated, the release may be harmful to human health or the environment, or which may cause a sheen or discoloration of the water surface and/or adjacent shoreline or

creates a sludge accumulation, notification of the U.S. Coast Guard is required. Such notification should be made as soon as the scope and magnitude of the spill event can be assessed. Notification of regulatory agencies will occur at the discretion of the Spill Team Coordinator in consultation with other management personnel as he considers appropriate. Should the Process Supervisor be unavailable to function as Spill Team Coordinator, his role shall be assumed by the Process Supervisor's designee or an alternate Process Supervisor.

If considered necessary by management personnel, the initial verbal report should be filed with the U.S. Coast Guard National Response Center in Washington, D.C. at (800) 424-8802. The reporter should obtain the name of the Coast Guard Duty Officer, note the time of the report, and furnish the following information:

U.S.C.G. SPILL NOTIFICATION REPORT SUMMARY

1. Time and location of the spill event
2. Estimate of the quantity of material spilled and pertinent chemical data if appropriate
3. Specific location and condition of the spill
4. Cleanup and emergency procedures being taken
5. Other agencies which will be notified
6. Assistance which may be required or requested

The Spill Team Coordinator should follow up with notification to other agencies as appropriate to the nature of the spill event.

Following satisfactory resolution of the spill event, the Spill Team Coordinator must prepare one or more written reports. A facility report should be prepared summarizing the spill event and all aspects of its resolution as an aid to management and training for future response situations, SPCC Plan improvements, and facility needs.

If the spill event resulted in the release of more than 1,000 gallons to navigable waters or adjoining shorelines in a single spill event, or discharged "harmful quantities" to navigable waters or adjoining shorelines in two events within a twelve month period, a written report is also required to the Regional Administrator of the Environmental Protection Agency. This written report must be submitted within 60 days of qualifying under these requirements and must include the following:

WRITTEN REPORT TO EPA REGIONAL ADMINISTRATOR SUMMARY

1. Name of the facility;
2. Name of the owner or operator of the facility;
3. Location of the facility;

4. Date and year of initial facility operation;

5. Maximum storage or handling capacity of the facility and normal daily use;

6. Description of the facility, including maps, flow diagrams, and topographical maps;

7. A complete copy of the facility SPCC Plan and amendments;

8. The cause of such spill, including a failure analysis of the system or subsystem in which the failure occurred;

9. The corrective actions and/or countermeasures taken, including an adequate description of equipment repairs and/or replacements;

10. Additional preventative measure(s) taken or contemplated to minimize the possibility of recurrence; and

11. Any additional information as considered appropriate by the Regional Administrator pertinent to the SPCC Plan or spill event.

Should a written report to the EPA Regional Administration be required, duplicate copies of all information submitted shall be sent to the Florida Department of Environmental Protection and/or the U.S. Coast Guard for review. If the spill extends beyond the boundaries of the facility, but does not reach the waterway (stream, canal, river, marsh or tributary), FDEP will be notified. If the spill discharges to a waterway, then the U.S. Coast Guard will be notified.

9.0 SPILL TEAM RESPONSIBILITY,

TRAINING & QUALIFICATIONS

SPILL TEAM RESPONSIBILITY, TRAINING & QUALIFICATIONS

Organization

It is the responsibility of the Process Supervisor to act as the facility's Spill Team Coordinator (STC) and to become familiar with the contents of the SPCC Plan. The Process Supervisor shall organize and maintain a Spill Control Team (SC Team).

Spill Team Coordinator

The STC will be notified immediately at the time the spill is discovered. The STC will go directly to the spill and will provide direction for the SC Team. The STC will then oversee and control all activities required to manage the spill and its subsequent cleanup. The STC is authorized to use any means necessary (engineering, maintenance, contractors or consultants) to stop, minimize, cleanup and analyze spill damage.

Spill Team Coordinator Responsibilities

- Assure preparation and update of the SPCC Plan as required by law. This Plan will be updated every three years or when a change occurs in the facility
- Respond to all spills, evaluate the environmental impact and advise management personnel
- Communicate with regulatory agencies
- Participate on countermeasure committee to develop and initiate further prevention plans
- Prepare required reports
- Conduct periodic training sessions to ensure SC Team members are familiar with the SPCC Plan and the techniques described therein.
- Conduct a quarterly inspection of the facility to ensure that all parts of the plan are functional
- Accompany regulatory officials on inspection tours
- Inform Management of any exceptions or deficiencies in the SPCC Plan or facilities
- Maintain necessary inventory of spill control equipment and supplies at the facility site

- Maintain a current list of contractors available to aid in the control, cleanup and disposal of spills

- If the facility has discharged more than 1,000 gallons of oil in a single spill or a harmful quantity of oil (as defined in the regulations) in two spill events within a twelve month period, the STC is responsible for submitting a report containing information, as designated in the regulations, to the EPA Regional Administrator and the appropriate State agencies

Spill Team Coordinator Qualifications

- Must be thoroughly familiar with all aspects of this Plan, all operations and activities at this facility, the location and characteristics of the materials handled, the location of all associated records within the facility and the facility layout

- Must have the authority to commit the resources needed to carry out the Emergency Response Plan

- Must be trained in the use of all emergency control and safety equipment

Spill Team Member Responsibilities

- Undergo periodic training to acquire and maintain proficiency in the practices and procedures for handling oil spills

- Leave normal assigned job immediately (if the task at hand may be safely set aside) upon alert of a spill, proceed to the spill location, and take up assigned position

- Use appropriate equipment to assist in stopping, containing, removing and disposing of the spilled material as directed

Spill Control Team Member Qualifications

- Must be trained in response procedures and in the use of the necessary control and safety equipment

- Must be familiar with the potential dangers or hazards of oil spills

- Must be familiar with each potential spill area and its daily management as described in this plan

Personnel Training

All facility personnel involved in the daily management practices and emergency procedures described in this plan, shall be instructed in the procedures to follow as written in this plan. They shall be continuously updated with any new information regarding the procedures and techniques outlined in this plan. In addition to the procedures described herein, training will include an

appropriate discussion on general rules and regulations, security, and safety practices which comply with both LES corporate policy and regulatory statutes. Additionally, should spills occur, their causes will be analyzed and discussed along with new spill prevention and abatement technologies and techniques. Initial training and semi-annual reviews of the required training shall be conducted by the Process Supervisor working in conjunction with other LES personnel.

Local Emergency Response Agencies

After determining the severity of a spill or emergency event, the STC may decide to request assistance from local emergency response agencies. When notifying the local response agency, the STC shall provide them with the best route to the site and all other information needed to efficiently respond.

Upon their arrival at the site, the STC shall immediately establish communication with the response agency unit leader and provide him or her with any information or assistance needed.

The following is a list of local response agencies and their emergency telephone numbers:

Fire Department	911
Police	911

In addition to the local response agencies, additional safety equipment and/or manpower may be obtained through the following commercial emergency response provider:

Jacksonville Pollution Control	355-4164
Environmental Remediation Services	791-9992

10.0 SPILL PREVENTION CONTROL

& COUNTERMEASURE PROCEDURES

SPILL PREVENTION, CONTROL & COUNTERMEASURE PROCEDURES

The prompt containment of a spill, as well as the safe cleanup and disposal of spill contaminated materials, depends on the successful implementation of the SPCC Plan.

In order to provide a comprehensive and effective SPCC Plan, a description of the facility's potential spill areas, probable spill routes and characteristics and related hazards of the potential spill materials is required.

The LES facility has two areas where a spill potential exists:

Area 1 - Bulk Storage Tanks for Wastewater and Oil

Area 2 - Loading Docks (three stations)

AREA 1

Potential Releases

Possible sources of materials release from the bulk storage areas include:

1. Catastrophic failure of tanks
2. Development of leaks in tanks, piping, pumps and valves
3. Accidental overflow of tanks due to operator error

Catastrophic Failure

In the event of a catastrophic failure, the site shall be inspected by the Plant Manager prior to the commencement of cleanup activities. This inspection shall be conducted to determine if the containment system has been breached resulting in a spill outside the confines of the facility. In the event material escapes the containment system, appropriate notification and response procedures will be implemented.

Although the probability of a catastrophic tank failure within a well-maintained facility is low, there are three potential scenarios for oil to escape the facility via catastrophic tank failure:

1. a wave of oil might splash into the secondary containment wall, possibly sloshing outside
2. a portion of the tank itself (and its contents) might fall over the side of the secondary containment wall

3. tank explosion ejects might be thrown outside the confines of the facility

In any of these cases, appropriate control measures shall be immediately brought to bear depending on the magnitude of the spill. Return of released material to an appropriate storage vessel shall proceed at the discretion of the STC, or in his absence, the STC's designee or the Plant Manager.

Spills of oil via catastrophic tank failure would be primarily (if not entirely) contained within the secondary containment system. Once the STC has deemed the area safe for workers, cleanup efforts would begin using the submersible sump pump at the low point of the yard. Depending on the amount and physical consistency of the spill, other means of cleanup such as the use of portable pumps and the facility's vacuum truck could be used to transfer the material to a suitable storage vessel.

Leaks

If a leak is detected, the tank, the pipe, pump or valve will be immediately voided and taken out of service until it can be repaired. Any leaks from tanks or ancillary equipment are primarily contained by concrete moats and curbs and secondarily contained by the concrete slab and perimeter barrier.

Operator Error

The potential exists for accidental overflow of tanks and/or failure to close valves resulting in a release of oil or wastewater. Oil storage tanks are equipped with gauges for determining the exact amount of material in the tank (alarms or indicators). In the event of an overflow or release from a valve, the material is primarily contained by moats and curbs and secondarily by the concrete slab and perimeter barrier.

AREA 2

Potential Releases

The greatest potential for a spill in Area 2 is during off-loading operations from tanker trucks to the storage tanks and the loading/off-loading of tankers at the Oil Dock. Potential types of material released are oily wastewater and oil.

All loading and off-loading operations will take place strictly in designated areas where rack drainage flows into the facility catch basin. A facility representative is present during all loading/off-loading operations. Employee safety is of paramount concern; leaks must be immediately stopped or otherwise controlled, but never at the risk of employee safety.

Tanks engaged in loading/unloading operations shall be moved only after the rack attendant has completed a walk-around inspection to insure all connections have been secured and that all outlets have been examined for leakage. If necessary, such outlets should be tightened, adjusted or replaced to prevent leakage while in transit. Warning signs are posted in rack areas to remind personnel to execute the above procedure.

The loading dock areas are surrounded by a containment curb and the area drains to a sump within the plant. The containment area is designed for small amounts of spillage which may occur while changing hoses.

Response to a Spill Event

Besides minor amounts of material which drip or are spilled within the containment curbs in Area 2 during normal operations, the most likely potential cause of a spill event at the loading rack is operator error. Failure to properly close valves, disconnect hoses, and secure hatches can result in spills of varying degrees of severity. Another potential cause of spills at the loading rack is equipment failure (fittings, hoses, valves or pumps). Should this type of spill occur at the loading rack, the rack employees, who are not necessarily members of the SC Team, will take appropriate steps to stop or control the spill. If immediate measures to control the leak or spill are not successful the STC, or his designee shall be notified without delay. In any case, the STC shall ultimately be notified of the incident.

A large spill of oil or oily water in Area 2 could overwhelm the capacity of the sump within the plant to which the rack areas drain. At that point, spilled material would begin to accumulate within the containment curb until its capacity had been reached. It would essentially require a badly broken fixture, a catastrophic failure of the tanker, or an otherwise very large breach in the tanker wall (i.e., a collision or explosion) to overwhelm the first two lines of defense (sump and curbing). However, should the rack containment system be overwhelmed, oil would flow north toward the perimeter ditch outside of the facility. In this unlikely event, the following will be implemented:

1. Immediate containment of the spilled material using sand, sand bags, absorbent clay, or sorbent booms and pads.

2. If material begins to drain into the perimeter ditch, shovels should be employed to dig a berm, preventing any material from draining into the east ditch.

3. Cleanup of the spilled material will begin immediately under the direction of the STC.

SECURITY

Facility Security

The perimeter of the LES facility is fenced and gates are posted with signs prohibiting entry of unauthorized personnel. Yard security lights are operational during all hours of darkness, providing sufficient light to deter vandalism and allowing yard personnel to observe spills should they occur.

Equipment

All master flow and drain valves and any other valves that permit direct outward flow of a tank's contents are securely locked in the closed position when not operating or in non-standby status. Starter controls on all oil pumps are either in the locked position or only accessible by authorized personnel when the pumps are not operating or in non-standby status. The loading/unloading connections of oil pipelines are securely capped or blank flanged when not in service for an extended time.

11.0 FACILITY INSPECTION AND RECORDS

FACILITY INSPECTION AND RECORDS

Weekly Inspection

A formal visual inspection of tanks, piping systems and oil loading/unloading facilities will be conducted on a weekly basis. The results of the visual inspection will be recorded on the Inspection Report Log. The individual performing the inspections will be designated by the Plant Manager. The designated inspector will observe and document the following:

1. Oil leaks or potential oil leaks from:
    - Tank Shells
    - Valves
    - Flanges
    - Pipe Joints
2. Unlocked valves, pump/valve electrical starter controls
3. Open ended/uncapped pipes and open valves
4. Malfunctioning equipment, level and temperature indicators, valves, pumps, etc.
5. Condition of containment systems
6. Quantity (inventory) and condition of equipment and or materials necessary to properly control oil spills in accordance with the SPCC Plan
7. Warning signs and other safety-related items

The inspector will complete, date, sign, and submit the weekly inspection report form to the Plant Manager, who shall determine appropriate corrective action.

Periodic Inspections

Periodic inspections of the facility will be conducted at least once a year or more often as deemed necessary by the Plant Manager.

The inspector shall examine the following:

1. External condition of tanks, pumps, piping, etc.
2. Internal tank inspections as necessary (pitting, corrosion, etc.)

3. Defects or flaws in support structures

4. Condition of external protective coatings

5. Tank wall thickness shall be measured as deemed necessary

The inspector shall complete, date, and sign the Periodic Inspection Report and submit it to the Plant Manager who shall then make a timely report of corrective action as required

The inspector shall perform follow-up inspections as required to effect compliance and enter a report of performance to the records file.

Testing

A hydrostatic pressure test, interior visual inspection, ultrasonic wall test or other relevant measure of tank integrity will be performed as determined by the Plant Manager and inspector.

Records

Records of all Weekly Inspection Reports, Periodic Inspection Reports and related records shall be retained on file for a minimum of three years.

12.0 FACILITY CONFORMANCE WITH 40 CFR PART 112

FACILITY CONFORMANCE WITH 40 CFR PART 112

This section lists principles which have been adopted by Liquid Environmental Solutions of Florida, LLC to insure facility conformance with the requirements of 40 CFR Part 112.

Facility Drainage

- Drainage from diked areas will be restrained by valves or other positive means to prevent a spill or leakage of oil into drainage treatment system (except where systems are designed to handle such leakage).

- Flapper-type drains will not be used to drain diked areas. Such areas will be drained by valves of manual open-and-closed design.

- Plant drainage systems from undiked areas will flow into secondary containment systems designed to retain oil or return it to the facility.

- Where drainage waters are treated in more than one treatment unit, natural hydraulic flow is used wherever possible.

- Drainage systems will be adequately engineered to prevent oil from reaching navigable waters in the event of equipment failure or human error at the facility.

Bulk Storage Tanks

- No tank will be used for the storage of oil unless its material and construction are compatible with the material stored and conditions of storage such as pressure and temperature, etc.

- All bulk storage tanks will be constructed so that a secondary means of containment is provided for the entire contents of the largest single tank plus sufficient freeboard to allow for precipitation. Diked areas will be sufficiently impervious to contain spilled oil.

- Aboveground tanks will be subject to periodic integrity testing, taking into account tank design and using such techniques as hydrostatic testing, visual inspection or a system of non-destructive shell thickness testing.

- Comparison records will be kept, where appropriate, and tank supports and foundations included in inspections. The outside of tanks will be frequently observed by operating personnel for signs of deterioration, leaks that might cause a spill, or accumulation of oil.

- New and old tank installations will, as far as is practical, be fail-safe engineered or updated to avoid spills. There will be direct audible or code signal communication between the tank gauges and pumping station.

- Where liquid transfer operations cannot be monitored by be direct audible or code signal communication between the tank gauges and pumping station, a high liquid pump cut-off device will be set to stop flow at a predetermined tank content level.

- Liquid level sensing devices will be regularly inspected to insure proper operations.

- Visible oil leaks which result in loss of oil from tank seams, bolts, gaskets, or rivets large enough to cause accumulation of oil will be promptly repaired.

Facility Piping

- Pipeline out of service or on standby for an extended period will be capped or blank-flanged and marked as to origin.

- Pipe support will be properly designed to minimize abrasion and corrosion, and allow for expansion and contraction.

- All aboveground valves and pipelines will be subjected to regular examinations by operation personnel at which time the general condition will be assessed. Additionally, periodic pressure testing may be performed for piping in areas where failure might lead to a spill.

- Vehicular traffic granted entry into the facility will be warned verbally or by appropriate signs to insure it will not endanger aboveground piping.

Tank Truck Loading/Unloading

- Loading/unloading procedures will meet the minimum requirements established by DOT.

- Rack drainage will flow into the treatment facility via a catchment basin.

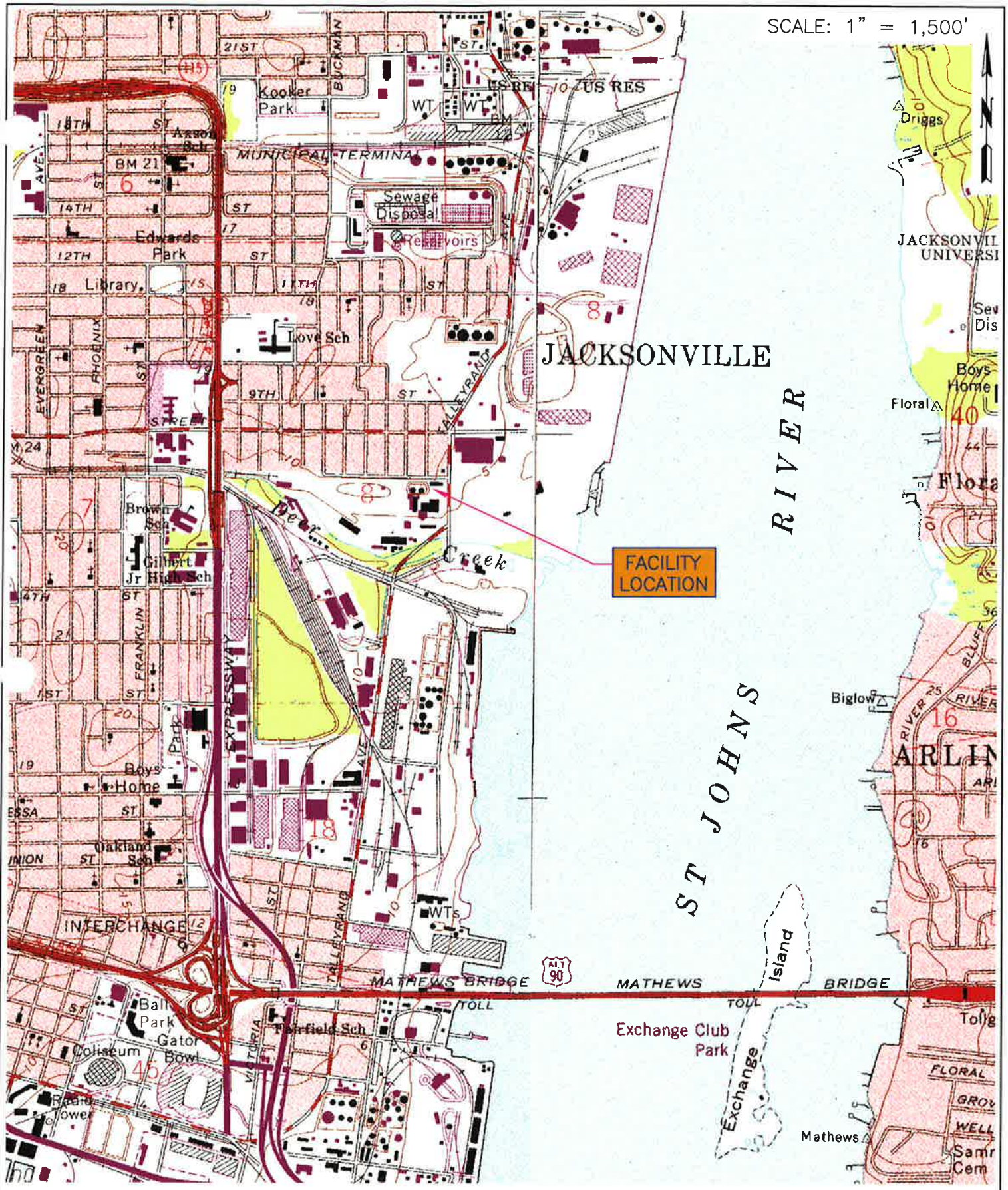
- Where rack containment systems are not engineered to provide containment to the maximum capacity of any single compartment of a tank truck loaded or unloaded at the plant, backup containment measures such as sandbagging, sorbent booms, and temporary shoveled berms will be employed in the event of a significant spill, to prevent oil from reaching navigable waters and to allow its return it to the facility.

- A physical barrier system or warning signs will be provided in loading/unloading areas to prevent vehicular departure before complete disconnect of flexible or fixed transfer lines.

- Prior to departure of any tank truck, the lower most drain and all outlets of such vehicles will be closely examined for leakage and tightened or adjusted to prevent liquid leakage while in transit.

13.0 FACILITY LOCATION MAP AND SITE PLAN

A Facility Location Map follows this page as Attachment C-7e.1 and a Facility Site Plan follows as Attachment C-7e.2



MITTAUER & ASSOCIATES, INC.
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LIQUID ENVIRONMENTAL SOLUTIONS OF FLORIDA, LLC
Used Oil Processing Facility Permit
SPCC Plan – Facility Location Map
Jacksonville, FL

Attachment
C–7e.1
September 2012
Project No.
9122–34–1

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30' 0 30' 60'
1" = 30'

N

ADMINISTRATIVE OFFICE

SEVENTH STREET (18' ASPHALT)

SAN. MH

S 89° 12' 20" E – 674.21'

N 00° 37' 30" E 34.97'

S 89° 12' 01" E – 97.29'

12" P.V.C.

N 00° 37' 30" W – 59.07'

S 89° 11' 51" E 256.77'

N 01° 39' 16" E – 133.53'

N 00° 00' 00" E – 110.42'

S 89° 02' 44" E – 325.75'

RECEIVING LAB/OFFICE
CANOPY
BACK LAB
EMPLOYEE BREAKROOM
DIGESTION ROOM
MAINTENANCE SHOP
STEEL FRAME SHED
GATE
SOLIDS UNLOADING PIT
FILTER PRESS
TANK 95
TANK 96
TANK 97 FILTER PRECOAT
TANK 98
TANK 99 LIME SLURRY
PRIMARY EVACUATION ROUTE
TANK 94
TANK 93
SOLIDS DEWATERING FACILITY
AIR COMPRESSOR
STORMWATER SUMP
TANK 92
TANK 91
RACK 1 OILY WATER/PCW UNLOADING AREA
SHED
GATE
RACK 3 OILY WATER/PCW UNLOADING AREA
TANK 3A
TANK 3B
TANK 4A
TANK 4B
TANK 101
PORTABLE CHEMICAL TANKS
TANK 2
TANK 1
CONTAINMENT SUMP
TANK 84
TANK 83
TANK 82
TANK 81
TANK 87
TANK 86
TANK 85
TANK 88
TANK 71
TANK 72
OIL SEPARATOR TANK 44
CHEMICAL INJECTION SYSTEM
ACID
CAUSTIC
STORMWATER SUMP
STORMWATER SUMP
TANK 6
TANK 70
ELECTRICAL SHED
RAMP
ROLL GATE
SECONDARY EVACUATION ROUTE
SOLIDS UNLOADING AREA
TANK 62
TANK 61
RACK 4 OILY WATER/PCW UNLOADING AREA
STORAGE SHED
SPILL CONTINGENCY SHED
TANK 60
TANK 30
CONTAINMENT WALL
TANK 31
TANK 32
TANK 33
TANK 34
TANK 35
TANK 35A
TANK 36
TANK 37
TANK 39
TANK 38
TRENCH DRAIN
DYNASAND FILTER
EFFLUENT FILTER PUMP
TANK 7
TANK 8
TANK 9
STORMWATER SUMP
TANK 90
TANK 89
FILTER FLOW EQUILIZATION TANK
CONTAINMENT WALL
TANK 47
COVERED AREA
OPERATOR'S OFFICE
DAF INLET TANK
DAF TANK 45
BOILER
RACK 2 USED OIL LOADING/UNLOADING AREA
HEAT EXCHANGER TANK 50
TANK 53
TANK 54
TANK 55
TANK 56
TANK 52
TANK 51
TANK 27
TANK 26
TANK 25
TANK 24
TANK 23
TANK 22
TANK 21
TANK 10
TANK 16
TANK 12
TANK 14
TANK 18
TANK 20
TANK 19
TANK 17
SECONDARY EVACUATION ROUTE

LEGEND

- F – FIRE EXTINGUISHING EQUIPMENT
- SC – SPILL CONTROL EQUIPMENT
- IC – INTERNAL COMMUNICATIONS & ALARM SYSTEM
- EC – EXTERNAL COMMUNICATIONS & ALARM SYSTEM
- D – DECONTAMINATION EQUIPMENT
- PRIMARY EVACUATION ROUTE
- SECONDARY EVACUATION ROUTE

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Liquid Environmental Solutions of Florida, LLC

Used Oil Processing Facility Permit
SPCC Plan – Existing Site Plan
Jacksonville, Florida

JOSEPH A. MITTAUER LICENSE No. 23111 STATE OF FLORIDA PROFESSIONAL ENGINEER
DEC. 7, 2012

Project No. 9122-34-1
ATTACHMENT
C-7e.2
AUGUST 2002
REV. 10/05/07
REV. 9/13/12

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14.0 INSPECTION AND REPORTING FORMS

SPCC ANNUAL INSPECTION LOG

EQUIPMENT	INSPECTION	YES	NO
TANKS PUMPS PIPING	EXTERNAL CONDITION SATISFACTORY		
TANK	INTERNAL INSPECTION CONDUCTED		
SUPPORT STRUCTURES	DEFECT OR FLAW FREE		
EXTERNAL PROTECTIVE COATINGS	GOOD CONDITION		
TANK WALL THICKNESS	ADEQUATE		
TANK TESTING REQUIRED	TANK NUMBERS TYPE TEST		
INSPECTOR:	DATE:		
SUBMITTED TO GENERAL MANAGER			

SPCC Monthly Spill Contingency Inventory

Minimum Count	Item	Actual Count
100	Sorbent Pads	
100	Pounds of Kitty Litter	
6	Pair of Tyvek Coveralls	
6	Pair of Splash Goggles	
6	Pair of PVC Gloves	
1	Pair of Large Over Shoes	
10	Poly Bags	
20	Filled Sand Bags	
10	Hazardous Waste Labels	
2	Squeegees	
2	Shovel	
2	Rake	
1	Box of Rags	
1	Bung Wrench	
1	Roll of Plastic	
50	Pounds of Soda Ash	
1	85 Gallon Overpack	
2	Five Gallon Pails	
1	Pair of Channel Lock Pliers	
1	Roll of pH Paper	
1	Roll of Barricade Tape	
2	Danger Signs	
1	Roll of Duct Tape	
10	Blank Copies of This Inventory	
5	Flashlights	
	Month:	
	Date:	

SPCC WEEKLY INSPECTION LOG

EQUIPMENT	INSPECTION	YES	NO
TANKS VALVES FLANGES PIPES JOINTS	LEAK FREE		
VALVES	SECURED		
OVERFILL/SPILL PROTECTION	FUNCTIONING		
DIKES AND CONTAINMENT	INTACT AND IMPERMEABLE		
SPILL CONTROL EQUIPMENT	IN PLACE AND IN ADEQUATE SUPPLY		
INSPECTOR:	DATE:		
SUBMITTED TO GENERAL MANAGER			

LES
SPILL REPORT FORM

Date:_____ Time: _____ Quantity:_____

Material released: _____
_____
_____

Where was it released?: _____
_____
_____

Containment: When: _____ Where: _____

How was it contained?: _____
_____

Emergency Actions: _____
_____

Chemical Hazards: _____
_____

Impact to human health or environment: _____
_____
_____

Weather conditions: Temperature: _____ Precipitation: _____
Wind speed: _____ Wind direction: _____

Agency notified (note time of call and person(s) contacted): _____
_____
_____

Cleanup action: _____
_____
_____

Additional comments: _____
_____
_____

Completed by:_____ Signature:_____
Date completed:_____

APPENDIX A

ROSTER OF PERSONNEL

ROSTER OF PERSONNEL January 10, 2008

NAME	TITLE	HOME PHONE	CELL PHONE	ADDRESS
* Keith Adams	Process Supervisor	(904)-683-4596	(904) 509-2717	4435 Crossbow Road Jacksonville, FL 32208
Yuri Turovsky	Plant Manager	(904) 886-7997	(904) 509-2032	11549 Sedgemoore Dr S. Jacksonville, FL 32223
Ed Jesus	Division Manager		(904) 430-3847	

* Primary Emergency Response Coordinator

APPENDIX B

40 CFR PART 279 CONTINGENCY PLAN

TABLE OF CONTENTS

SECTION B-I

INTRODUCTION

INTRODUCTION

The purpose of this appendix to the LES SPCC plan is to satisfy the requirements under 40 CFR Part 279 that used oil processing and re-refining facilities develop a contingency plan. This contingency plan will address only those used oil management provisions not already addressed in the SPCC plan.

SECTION B-II

FIRE RESPONSE PROCEDURES

FIRE RESPONSE PROCEDURE

The potential for a fire hazard exists at the LES facility due to the treatment and storage of certain flammable and ignitable wastes containing petroleum, petroleum solvents, xylene, and gasoline. Explosion is also a potential hazard when organic vapors come in contact with heat or an ignition source.

Small fires may be immediately extinguished by selecting and using the appropriate fire extinguisher. New LES personnel working in the plant receive instruction on the proper selection and application of fire extinguishers during initial job orientation, as well as familiarization with potential fire hazards and location of fire extinguishers within the facility. This is supplemented with periodic hands-on training in. Table B-II-1 lists LES fire extinguishers:

TABLE B-II-1

FIRE EXTINGUISHER INFORMATION

UNIT NUMBER	LOCATION	TYPE
1	Receiving Lab	ABC
2	Receiving Lab	ABC
3	Back Lab	ABC
4	Digestion Room	ABC
5	Maintenance Shop	ABC
6	Portable Welding Machine	ABC
7	Tk 95	ABC
8	Filter Press, upper level	ABC
9	Oil Dock Tk 27	Foam
10	Oil Dock Backside Tk 16	ABC
11	Stormwater Sump Pit 5	ABC
12	Hot Oil Boiler	ABC
13	DAF, ground level	ABC
14	DAF, upper level	ABC
15	Tk 38	ABC
16	Spill Shed, backside	ABC
17	Rack #4	ABC
18	Box 61/62, east side	Foam
19	Electric Shed, west side	ABC
20	Tk 81, upper level	ABC
21	Tk 87, upper level	ABC
22	Tk 84, ground level	ABC
23	Rack Shed	ABC
24	Admin Office	ABC
25	Spare, maintenance shop	ABC
26	Spare, maintenance shop	ABC

The positions of these fire extinguishers are represented diagrammatically in Section B-VII, Facility Site Plan.

Potential hazards from chemical spills exist from the storage, transfer and usage of a variety of chemicals in the plant. In the event of a fire at the LES facility the following procedure will be followed:

The fire alarm will be activated indicating evacuation is necessary within the compounds of the plant. The fire alarm is located within the plant next to the DAF unit and the triggering of this alarm will alert all employees within the compounds of the plant to evacuate immediately. Upon activation of the fire alarm, the fire department will be contacted from a telephone by dialing 911.

All personnel will evacuate the plant area via the described evacuation routes shown in Section B-VII, Facility Site Plan. The diagram indicates several evacuation routes in the event that one route may be blocked. After plant evacuation, the Emergency Coordinator will ensure all personnel are accounted for and out of the endangered area.

In the event contracted emergency response teams or state emergency response teams assistance is required, the Emergency Coordinator will coordinate their assistance from a telephone located in the administrative office or sales office.

Local authorities arriving at the scene will receive a copy of this Plan and be advised on the current situation by the Emergency Coordinator.

SECTION B-III

SPILL RESPONSE PROCEDURES

SPILL RESPONSE PROCEDURES

Oil spill response procedures are given in Section 10 of the SPCC plan.

SECTION B-IV

EXPLOSION RESPONSE PROCEDURES

EXPLOSION RESPONSE PROCEDURES

An explosion at the LES facility would constitute a major event requiring immediate evacuation of the facility. In the event of an explosion the LES Evacuation Plan will be immediately put into effect (refer to Section B-VI of this plan for a description of the LES Evacuation Plan). In the case of an explosion at the LES facility emergency responders will be immediately contacted by dialing 911. After assessing the situation, the Emergency Coordinator will notify the appropriate agencies as required by the nature and scope of the incident.

SECTION B-V

HANDLING CONTAMINATED MEDIA AND RESIDUES

HANDLING CONTAMINATED MEDIA AND RESIDUES

Depending on an assessment by the Emergency Coordinator, and based upon the type(s) and amount of materials involved, contaminated media and residues from emergency response actions to spills, fire, or explosions will be containerized in drums or roll-offs.

Unless oil-contaminated media has been designated to be managed by burning for energy recovery, it will be properly disposed. Such media will be analyzed by laboratory testing as specified by the receiving disposal facility. In most cases this will involve TCLP metals and volatiles, pH, and flash point, at a minimum, although different facilities may have more stringent analytical requirements depending on the ultimate fate of the disposed material (incineration, landfilling, etc.)

Residues form emergency response actions may comprise fire fighting foam or chemicals, tank bottom residues, or other materials which may have become involved in an emergency incident and are not simply contaminated with used oil. Such material will be containerized in drums or roll-offs, depending on its physical nature and volume, and properly disposed. Analytical testing requirements vary from one disposal facility to another, but in most cases will involve, at a minimum, TCLP metals and volatiles, pH, and flash point.

Should analytical testing of contaminated media or residues reveal that the material is a hazardous waste, the material will be transported from the point of generation to an appropriate disposal facility within ninety days.

If it can be cleaned effectively, soiled personal protective equipment, tools, and spill control equipment will be washed with mild detergent and returned to service. Wash water from this decontamination process will be treated in the wastewater portion of the facility to meet JEA discharge standards and disposed via the sanitary sewer. Disposable personal protective equipment or reusable items which cannot be cleaned will be containerized, analytically tested, and properly disposed.

SECTION B-VI

EVACUATION PLAN

EVACUATION PLAN

Potential emergencies which may require evacuation from the LES are limited primarily to fire hazards from the storage or spillage of ignitable or flammable materials and large scale chemical spills.

Evacuation routes from the LES facility are shown in Section B-VII. Copies of the site plan with evacuation routes identified are posted in the following locations:

- Administrative Office
- Rack Shed
- Laboratory
- Operator's Office

The criteria for implementing a facility evacuation are fires, potential explosion hazards and chemical spills that may be immediately dangerous to life or health or a potentially dangerous to human health.

Fires

All LES employees have been trained and authorized to activate fire alarms in the event of an emergency. In the event of a fire, the following events will occur:

1. The fire alarm will be activated indicating plant evacuation is necessary. The fire alarm is located within the plant next to the DAF unit and the triggering of this alarm will alert all employees within the compounds of the plant to evacuate immediately. Upon activation of the fire alarm, the fire department will be contacted from a telephone by dialing 911.

2. All personnel will evacuate the plant area via the described evacuation routes detailed in the diagram located in Section B-VII of this plan. The diagram indicates several evacuation routes in the event that one route may be blocked by releases of hazardous waste or fires.

3. After plant evacuation, the Emergency Coordinator will ensure all personnel are accounted for and out of the endangered area.

4. In the event contracted emergency response teams or state emergency response teams assistance is required, the Emergency Coordinator will coordinate their assistance from a telephone located in the administrative office or sales office.

5. Local authorities arriving at the scene will receive a copy of this Plan and be advised on the current situation by the Emergency Coordinator.

Explosions

In the event of an explosion, the following events will occur:

1. If it can be safely activated, the fire alarm will be triggered indicating plant evacuation is necessary. The fire alarm is located within the plant next to the DAF unit and the triggering of this alarm will alert all employees within the compounds of the plant to evacuate immediately. Upon activation of the fire alarm, the fire department will be contacted from a telephone by dialing 911.

2. All personnel will evacuate the plant area via the described evacuation routes detailed in the diagram located in Section B-VII of this plan. The diagram indicates several evacuation routes in the event that one route may be blocked by releases of hazardous waste or fires.

3. After plant evacuation, the Emergency Coordinator will ensure all personnel are accounted for and out of the endangered area.

4. In the event contracted emergency response teams or state emergency response teams assistance is required, the Emergency Coordinator will coordinate their assistance from a telephone located in the administrative office or sales office.

5. Local authorities arriving at the scene will receive a copy of this Plan and be advised on the current situation by the Emergency Coordinator.

Chemical Spills

In the event of a chemical spill in quantities which may require an evacuation, the Emergency Coordinator will activate the internal alarm system and order an evacuation until the type and amounts of material spilled can be assessed. If more than one type of chemical is involved, situations may arise regarding incompatibilities. In the event this occurs the Laboratory Manager will be contacted to assess the situation.

If the spill can be handled safely by the LES spill team, clean up procedures will be implemented. In the event, the situation cannot be accurately assessed and safely handled by the LES spill team, the Emergency Coordinator will contact the fire department and outside emergency response contractors for immediate response. During an assessment or actual response to spill with potential exposure hazards present, all spill team personnel will be required to don the appropriate personal protection equipment to prevent the exposure to hazardous materials.

The command post area, the LES Operations Office is located across the street from the physical plant, is the area to convene for assessing any emergency response actions to take place.

Facility Evacuation Route Plan
follows Page 31 as Attachment C-7e.2

SECTION B-VII

FACILITY SITE PLAN

Facility Site Plan follows Page 31
as Attachment C-7e.2

SECTION B-VIII

ARRANGEMENTS WITH LOCAL AUTHORITIES

ARRANGEMENTS WITH LOCAL AUTHORITIES

The following local authorities and businesses have received copies of the LES SPCC Plan and Appendices:

1. Jacksonville Pollution Control (commercial emergency environmental services)
2. Environmental Remediation Services (commercial emergency environmental services)
3. State Emergency Planning Council
4. Local Emergency Planning Committee
5. Jacksonville Fire Department
6. Shands Jacksonville (Hospital)

ADDENDUM NO. 1

SPILL PREVENTION, CONTROL AND COUNTER MEASURE PLAN

Liquid Environmental Solutions of Florida, LLC

Effective Date: November 18, 2011

Repairs, modifications or alterations to existing field fabricated tanks shall be subject to Brittle Fracture Testing in accordance with API Standard 653, Tank Inspection, Repair, Alteration, and Reconstruction.

C. OPERATING INFORMATION

8. Unit Management Plan.

a) Containers:

LES manages drums and totes containing used oil, oily wastewater, and oily residues. Acceptance of containers of this material is handled pursuant to the LES Used Oil Analysis Plan.

Drums and totes containing used oil, oily wastewater, or oily residues, are managed within the contained portions of the facility. The containers are labeled used oil when accepted within the facility. Used oil and oily wastewater are pumped off to appropriate tanks within the facility. The containers are washed thoroughly and are either recycled or scrapped. Rinse water is managed in the facility along with other oily wastewater. Residues are pumped from the containers through Tank #10 to remove grit and debris. Remaining residue slurries are filter pressed along with similar material from other processes within the plant.

All containers are inspected weekly, pursuant to the facility inspection plan, to be certain that aisle space is adequate, that containers are appropriately labeled, not leaking or otherwise unsuitable for handling the contents and that they are being managed within the contained area of the facility.

b) Tanks and related equipment:

Tanks and related pipelines, valves, pumps and other ancillary equipment are shown in the plant diagram. All tanks are either carbon or stainless steel, inspected routinely pursuant to the facility inspection plan, and maintained in sound condition. All tanks are labeled used oil, oil/wastewater, PCW, wastewater, or wastewater/solids.

Pipelines are welded steel, with flanged connections for pumps, valves, and other equipment. The pipelines and related equipment are inspected regularly and necessary action taken to repair leaks, blockage, or malfunctions.

The secondary containment for the facility has a total calculated capacity of approximately 278,600 gallons. The largest tank at the facility, Tank 53, has a capacity of 85,000 gallons. The minimum secondary containment capacity required for the facility is 110% of 85,000 or 93,500 gallons.

The containment floor is a reinforced concrete slab. The walls are either concrete block filled with concrete or formed reinforced concrete. The slab is sloped to a sump located in the southeast corner of the contained area. The sump is equipped with a level actuated submersible pump, which transfers stormwater and any released material to holding tanks.

All stormwater and any releases within the contained area are managed within the facility pursuant to the process procedures outlined in C.4, above.

C. OPERATING INFORMATION

9. CLOSURE PLAN

INTRODUCTION

This plan is intended to fulfill the requirements of 40 CFR 279.54(h) and Chapter 62-710.800(9), F.A.C. The plan outlines the procedures necessary for closure of the used oil management portions of the LES facility. The attachments include a schematic plant diagram, schedule of analytical methods required for closure, rinseate and residues characterization, soils sampling and analysis protocol, and groundwater sampling and analysis protocol.

LES will maintain a copy of an approved closure plan on site until the Department has accepted certification of closure. LES will submit an updated and detailed closure plan to the Department at least 60 days prior to the scheduled closing of the facility. LES will provide written notice to the Department at least 30 days prior to the date final closure is to begin. Within 30 days of completion of closure, LES will submit to the Department a certification signed by an officer of LES and by an independent registered professional engineer stating that the portion of the facility subject to used oil regulation has been closed in accordance with the specifications and procedures set forth in the closure plan.

CLOSURE PROCEDURES

The management units to be closed pursuant to this plan include the tanks and containers used to manage used oil, PCW and oily wastewater; pipelines, valves, pumps and other associated equipment and the related secondary containment. The various units to be closed are shown on the attached diagram.

Upon closure, all the tanks, containers and associated equipment will be emptied and cleaned to remove all liquids and any residual solids. All material removed from the units will be processed on-site with treated wastewater discharged to the POTW, recovered hydrocarbons sent off-site to an end user or used oil processor and solids sent off-site to an appropriate disposal facility. All material will be properly characterized as described in the attachment and either processed on-site or sent off-site for disposal at an appropriate disposal facility.

All tanks, containers and associated equipment will be rinsed and cleaned using an appropriate detergent and pressure washed or otherwise cleaned as necessary. After cleaning, the units will be triple rinsed. When cleaned to acceptable standards, tanks, containers and associated equipment will be sold, scrapped or placed in other service. Acceptable standards will be determined by the facility(ies) accepting the tanks, containers and associated equipment. This will be documented by LES. All rinseate and cleaning residuals will be managed on-site or sent off-site for appropriate disposal.

When the tanks, containers and associated equipment have been cleaned to acceptable standards, the entire secondary containment of the facility will be pressure washed using water and appropriate detergents. When the pressure washing has been completed, a final rinse will be done and the rinseate tested using the applicable analytical methods. Rinseate and cleaning residuals will be managed on-site or sent off-site for appropriate disposal.

When the management units and the secondary containment have been cleaned to acceptable standards, soils near the secondary containment will be sampled and tested as described in the attachment covering soils sampling and testing.

Should soils testing indicate the presence of contaminants at unacceptable levels, groundwater will be tested by way of monitoring wells installed for that purpose as described in the attachment covering groundwater sampling.

Any contaminated soils will be removed from the site and sent to an appropriate disposal site. When any contaminated soils have been removed, groundwater will be further tested to determine levels of contamination, if any.

Should groundwater show unacceptable levels of contamination following facility closure and removal of any contaminated soils and if contaminated soils cannot be practically removed or decontaminated at time of closure, LES will close the tank system and proceed with appropriate post closure steps pursuant to 40 CFR 265.310, in accordance with 40 CFR 179.54(h)(ii).

LES Closure Plan

Attachments C.9a, C.9b, and C.9c

The Closure Plan – The Existing and Proposed Site Plans follows this page as Attachment C-9a and Attachment C-9b, and the Closure Plan – General Piping Schematic follows as Attachment C-9c.

LES Closure Plan

Attachment C.9.2

Schedule of Analytical Methods

Material	Metals	TRPH	Volatiles	Semi-volatiles	EOX / TOX
Residues *	EPA 6010B	EPA 8015B	EPA 8260B	EPA 8270C	EPA 9023
Groundwater	EPA 6010B	EPA 8015B	EPA 8260B	EPA 8270C	EPA 9020B
Soils	EPA 6010B	EPA 8015B	EPA 8260B	EPA 8270C	EPA 9023

* Tank residues will be analyzed according to the nature of the material. If the residue contains significant amounts of recoverable oil, analysis may be limited to EPA 8023.

LES Closure Plan

Attachment C. 9.3

Soils and Groundwater Sampling Protocol

Soils

Sample holes will be prepared at the locations shown in the attached plant diagram. Soils will be sampled at two different depths at each sampling location. The first soil sample will be collected at a depth of 6 to 12 inches below grade. The second sample will be collected at a depth of between 24 and 30 inches below grade or 6 inches above groundwater level if groundwater is not more than 3 feet deep. The soils will be analyzed using the analytical method listed in the parameters and methods schedule attached.

Groundwater

If soils contamination is found, groundwater-sampling wells will be placed to a depth of twenty feet in the vicinity of the contaminated soil. The groundwater will be sampled using the method listed in the attached schedule.

LES Closure Plan

Attachment C.9.4

Closure Schedule

1.	Removal of tank and container contents:	30 days.
2.	Cleaning of tanks, containers, pipelines, pumps, and other related equipment:	60 days.
3.	Cleaning of secondary containment:	30 days.
4.	Analysis of rinseate :	15 days.
5.	Soils sampling and analysis:	45 days.

SCALE: 1" = 30'

N

ADMINISTRATIVE OFFICE

SEVENTH STREET (18' ASPHALT)

SAN. MH

S 89° 12' 20" E – 674.21'

N 00° 37' 30" E 34.97'

S 89° 12' 01" E – 97.29'

CANOPY

RECEIVING LAB/OFFICE

BACK LAB

OFFICE TRAILER

DIGESTION ROOM

MAINTENANCE SHOP

MW-1

STEEL FRAME SHED

N 01° 39' 16" E – 133.53'

GATE

SOLIDS UNLOADING PIT

TANK 95

FILTER PRESS

TANK 96

TANK 97 FILTER PRECOAT

TANK 98

TANK 99 LIME SLURRY

TANK 94

TANK 93

SOLIDS DEWATERING FACILITY

AIR COMPRESSOR

TANK 92

TANK 91

STORMWATER SUMP

RACK 1 OILY WATER/PCW UNLOADING AREA

SHED

TANK 3A

TANK 3B

TANK 4A

TANK 4B

TANK 101 PORTABLE CHEMICAL TANKS

TANK 2

TANK 1

CONTAINMENT SUMP

RACK 3 OILY WATER/PCW UNLOADING AREA

TANK 84

TANK 83

TANK 82

TANK 81

TANK 87

TANK 86

TANK 85

TANK 88

TANK 71

TANK 72

OIL SEPARATOR TANK 44

ELECTRICAL SHED

RAMP

ROLL GATE

SOLIDS UNLOADING AREA

TANK 62

TANK 61

RACK 4 OILY WATER/PCW UNLOADING AREA

STORAGE SHED

SPILL CONTINGENCY SHED

TANK 60

TANK 30

TANK 31

TANK 32

TANK 33

TANK 34

TANK 35

TANK 35A

TANK 36

TANK 37

HEAT EXCHANGER TANK 40

S 89° 11' 51" E 256.77'

MW-3

N 00° 37' 30" W – 59.07'

N 00° 00' 00" E – 110.42'

MW-4

12" P.V.C.

CHEMICAL INJECTION SYSTEM

ACID CAUSTIC

STORMWATER SUMP

STORMWATER SUMP

TANK 6

TANK 70

MW-2

TRENCH DRAIN

TANK 39

TANK 38

CONTAINMENT WALL

TEMPORARY LOCATION OF NEW DAF UNIT

TANK 47

DAF INLET TANK 45A

PERMANENT LOCATION OF DAF TANK 45

DYNASAND FILTER

EFFLUENT FILTER PUMP

TANK 90

TANK 89

TANK 7

TANK 8

TANK 9

STORMWATER SUMP

FILTER FLOW EQUILIZATION TANK

CONTAINMENT WALL

MW-6

MW-5

S 89° 02' 44" E – 325.75'

TANK 54

TANK 55

TANK 56

TANK 53

TANK 52

TANK 51

RACK 2 USED OIL LOADING/UNLOADING AREA

TANK 10

TANK 16

TANK 12

TANK 14

TANK 18

TANK 20

TANK 19

HEAT EXCHANGER TANK 50

TANK 27

TANK 26

TANK 25

TANK 24

TANK 23

TANK 22

TANK 21

TANK 17

BOILER

S1 S2 S3 S4 S5 S6 S7 S8 S9 S10 S11 S12

SCHEDULE OF EXISTING TANKS

No.	NAME/USE	CAPACITY
1	OW	27,270
2	OW	27,270
3A	OW	15,000
3B	OW	15,000
4A	O	10,000
4B	O	20,000
6	HAZ WASTE	62,000
7	W	22,000
8	W	22,000
9	W	23,000
10	O	4,800
12	O	7,800
14	O	9,750
16	O	16,075
17	VIRGIN FUELS	1,200
18	O	9,950
19	O	7,800
20	O	7,800
21	VIRGIN FUELS	8,000
22	O	7,800
23	O	9,950
24	O	15,000
25	O	15,000
26	O	15,000
27	O	15,000
30	W	500
31	W	10,000
32	W	12,000
33	W	12,000
34	W	12,000
35	W	10,000
35A	W	11,650
36	W	20,000
37	W	20,000
38	W	30,000
39	W	30,000
40	HEAT EXCHANGER	N/A
44	OIL SEPARATOR	10,000
45	DAF UNIT	2,000
45A	DAF INLET	1,000
47	CAUSTIC SODA STORAGE	4,200
50	HEAT EXCHANGER	N/A
51	O	15,000
52	O	15,000
53	O	85,000
54	O	19,000
55	O	9,750
56	O	20,000
60	S	12,000
61	S	8,000
62	S	8,000
70	S/OW	9,500
71	OW	6,500
72	OW	6,500
81	HAZWASTE–PCW	5,000
82	HAZWASTE–PCW	5,000
83	HAZ WASTE	5,500
84	HAZ WASTE	5,500
85	HAZ WASTE	6,000
86	HAZ WASTE	6,000
87	HAZ WASTE	6,000
88	OW	6,000
89	S	10,000
90	S	10,000
91	OW	5,000
92	OW	5,000
93	S/OW	12,000
94	S/OW	12,000
95	S	4,000
96	S	4,000
97	FILTER PRECOAT	1,000
98	W	12,000
99	LIME SLURRY	1,000
101	O	6,000

TANK LEGEND

- O – OIL MANAGEMENT UNIT
- OW – OILY WATER
- PCW – PETROLEUM CONTACT WATER
- S – SLUDGE OR SOLIDS
- W – WATER

CLOSURE SOIL SAMPLING LOCATIONS

SAMPLES (S1) – (S5) INTERIOR SAMPLES

SAMPLES (S6) – (S12) PERIMETER SAMPLES

MITTAUER & ASSOCIATES, INC.
CONSULTING ENGINEERS
580-1 WELLS ROAD, ORANGE PARK, FLORIDA 32073
TEL. (904) 278-0030 FAX. (904) 278-0840 FLORIDA CA No. 6569

JOSEPH A. MITTAUER LICENSE No. 23111 STATE OF FLORIDA PROFESSIONAL ENGINEER

2012

LIQUID ENVIRONMENTAL SOLUTIONS OF FLORIDA, LLC

Used Oil Processing Facility Permit

Closure Plan – Existing Site Plan

Jacksonville, Florida

Project No. 9122-34-1
ATTACHMENT
C-9a
AUGUST 2002
REV. 10/05/07
REV. 9/13/12

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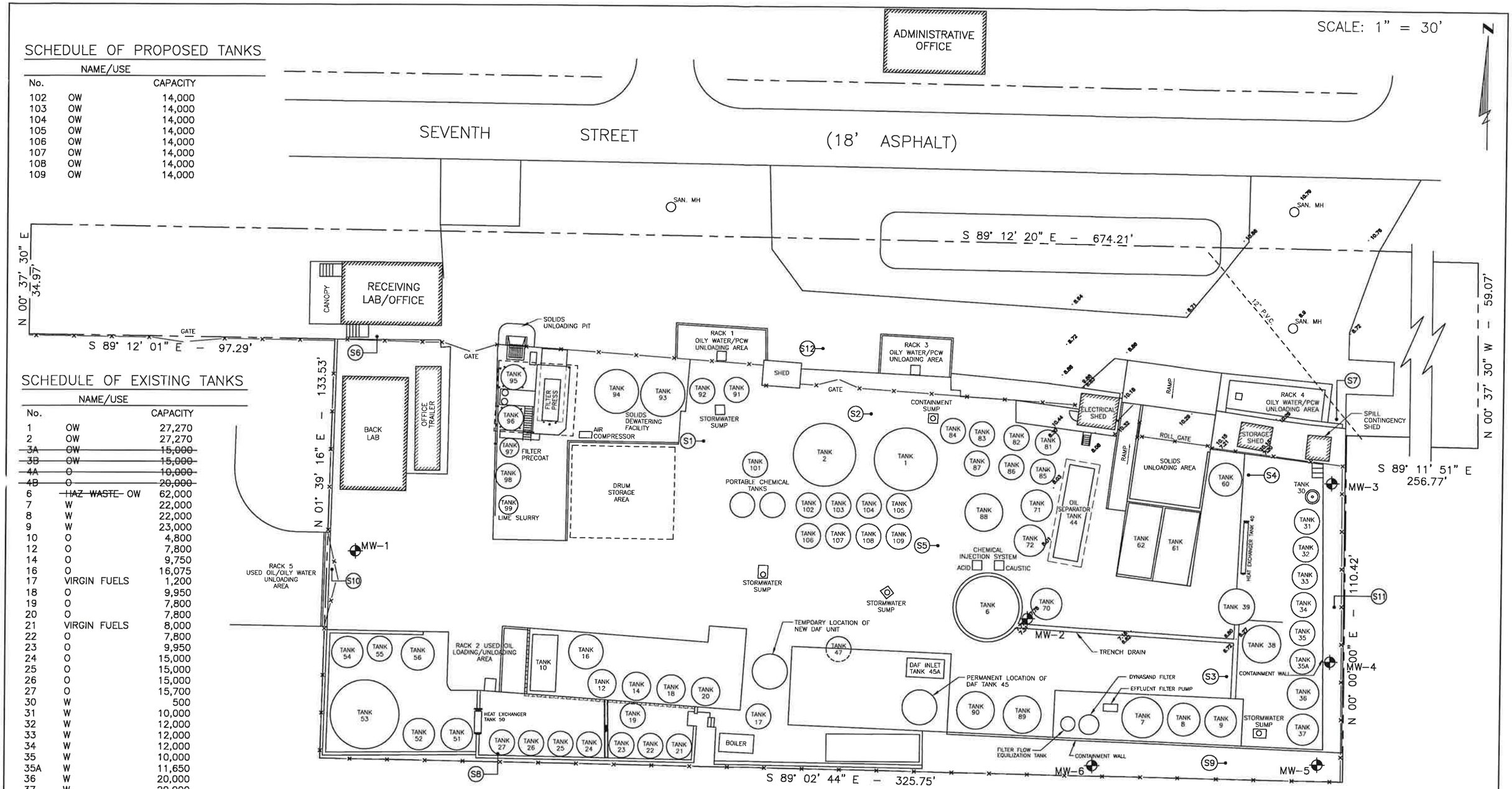
SCHEDULE OF PROPOSED TANKS

No.	NAME/USE	CAPACITY
102	OW	14,000
103	OW	14,000
104	OW	14,000
105	OW	14,000
106	OW	14,000
107	OW	14,000
108	OW	14,000
109	OW	14,000

SCHEDULE OF EXISTING TANKS

No.	NAME/USE	CAPACITY
1	OW	27,270
2	OW	27,270
~~3A~~	~~OW~~	~~15,000~~
~~3B~~	~~OW~~	~~15,000~~
~~4A~~	~~O~~	~~10,000~~
~~4B~~	~~O~~	~~20,000~~
6	~~HAZ WASTE~~ OW	62,000
7	W	22,000
8	W	22,000
9	W	23,000
10	O	4,800
12	O	7,800
14	O	9,750
16	O	16,075
17	VIRGIN FUELS	1,200
18	O	9,950
19	O	7,800
20	O	7,800
21	VIRGIN FUELS	8,000
22	O	7,800
23	O	9,950
24	O	15,000
25	O	15,000
26	O	15,000
27	O	15,700
30	W	500
31	W	10,000
32	W	12,000
33	W	12,000
34	W	12,000
35	W	10,000
35A	W	11,650
36	W	20,000
37	W	20,000
38	W	30,000
39	W	30,000
40	HEAT EXCHANGER	N/A
44	OIL SEPARATOR	10,000
45	DAF UNIT	2,000
45A	DAF INLET	1,000
47	DAF CLARIFIER	4,200
50	HEAT EXCHANGER	N/A
51	O	15,000
52	O	15,000
53	O	85,000
54	O	19,000
55	O	9,750
56	O	20,000
60	S	12,000
61	S	8,000
62	S	8,000
70	S/OW	9,500
71	OW	6,500
72	OW	6,500
81	~~HAZWASTE~~ PCW	5,000
82	~~HAZWASTE~~ PCW	5,000
83	~~HAZ WASTE~~ OW	5,500
84	~~HAZ WASTE~~ OW	5,500
85	~~HAZ WASTE~~ OW	6,000
86	~~HAZ WASTE~~ OW	6,000
87	~~HAZ WASTE~~ OW	6,000
88	OW	6,000
89	S	10,000
90	S	10,000
91	OW	5,000
92	OW	5,000
93	S/OW	12,000
94	S/OW	12,000
95	S	4,000
96	S	4,000
97	FILTER PRECOAT	1,000
98	W	12,000
99	LIME SLURRY	1,000
101	O	6,000



TANK LEGEND

O	–	OIL MANAGEMENT UNIT
OW	–	OILY WATER
PCW	–	PETROLEUM CONTACT WATER
S	–	SLUDGE OR SOLIDS
W	–	WATER

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LIQUID ENVIRONMENTAL SOLUTIONS OF FLORIDA, LLC
Used Oil Processing Facility Permit
Closure Plan – Proposed Site Plan
Jacksonville, Florida

JOSEPH A. MITTAUER LICENSE No. 39811 STATE OF FLORIDA PROFESSIONAL ENGINEER

Project No. 9122-34-1
ATTACHMENT
C-9b
AUGUST 2002
REV. 10/05/07
REV. 9/13/12

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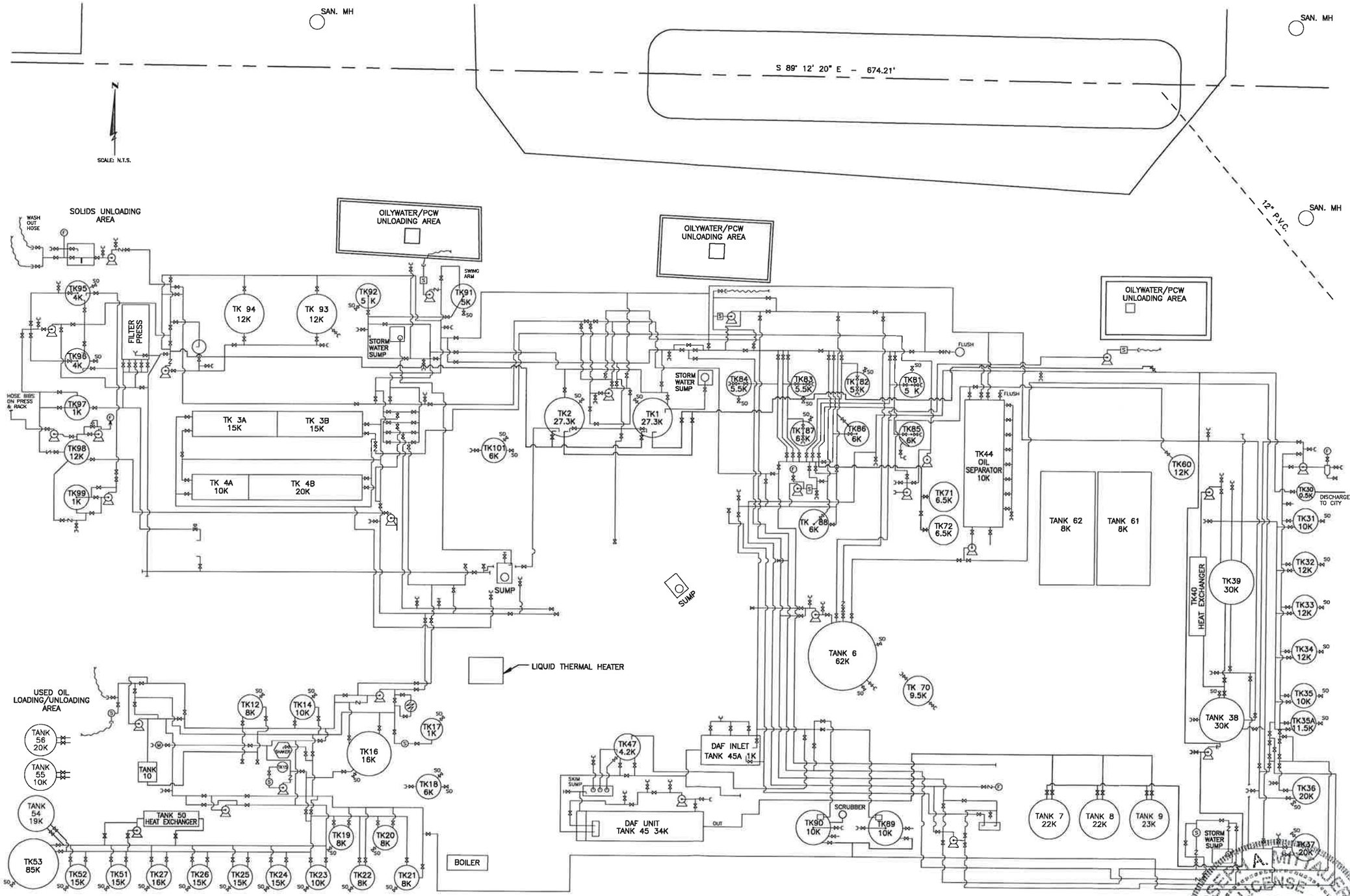

MITTAUER & ASSOCIATES, INC.
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TEL. (904) 278-0030 FAX. (904) 278-0840 FLORIDA CA NO. 6569

LIQUID ENVIRONMENTAL SOLUTIONS OF FLORIDA, LLC
Used Oil Processing Facility Permit
Closure Plan – General Piping Schematic
Jacksonville, Florida

JOSEPH A. MITTAUER LICENSE No. 23111 STATE OF FLORIDA PROFESSIONAL ENGINEER 2012

Project No. 9122-34-1
ATTACHMENT
C-9c
AUGUST 2002
REV. 10/05/07
REV. 9/13/12

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C. OPERATING INFORMATION

10. Used Oil Training.

a) Training sessions include review of the state and federal used oil regulations. The used oil training manual includes copies of these regulations. In addition, all employees required to have used oil training are also trained for emergency response. This includes review of the SPCC and contingency plans, training in the use of alarm and communication devices, contact of emergency response personnel within the organization and outside responders, if necessary. These personnel are also trained in fire fighting and spill response.

b) All training is documented in writing and placed in the respective employees' personnel file. The general manager maintains a cumulative record of each employee's training.

c) Training is updated to address changes in regulations or in facility operations. The general manager and process supervisors review training requirements at least annually.

LIQUID ENVIRONMENTAL SOLUTIONS OF FLORIDA, LLC (LES)

USED OIL TRAINING MANUAL

2012

Table of Contents

1.0 Introduction

1.1 Background of Regulations

Emphasis on used oil recycling. Florida has used oil regulations which were primarily for reporting used oil activity. Federal regulation was issued July 1, 1993 in 40 CFR 279. This rule was a compromise which regulated used oil activity but not as hazardous waste. The rule was revised to incorporate the federal rule and to extend some of the existing Florida regulations.

1.2 Basic Objective of Regulations

1. To identify all operators who are handling used oil.
2. To set minimum standards for used oil management.
3. To set reporting requirements for used oil activity.

1.3 LES Used Oil Activity

Liquid Environmental Solutions handles a wide variety of used oil, primarily in association with wastewater. The materials we handle include:

Fuel

- Gasoline – primarily PCW from fuel storage tanks.
- Jet fuel – this is an occasional item.
- Diesel – from a variety of sources.
- Bunker – mostly from ships or power plants.

Lube oils

- Crank case oil – from a variety of sources.
- Cutting oil – from metal working sources.
- Other lubricating oils – usually associated with wastewater.

Other hydrocarbons

- Various materials including, for example, mineral oils such as contained in Revlon products.

We are not generally a generator of used oil since we recycle used oil as an important part of our activity. Occasionally, we generate used oil filters.

Keep in mind that the rules are designed to be sure that permitted facilities handle used oil appropriately so that we avoid releases and protect people, including ourselves, and the environment.

2.0 Summary of Regulations

2.1 Federal Used Oil Rule – 40 CFR 279

This rule is divided into sections which are applicable to different categories of used oil management. Our Mobile activities are subject to regulation under Subpart F – Standards for Used Oil Processors, Subpart E - Standards for Used Oil Transporters, Subpart H – Standards for Used Oil Fuel Marketers.

2.2 Florida Used Oil Rule

This rule incorporated the federal rule by reference. The bulk of the Florida rule is concerned with applicability, notification, reporting, and permitting.

There is a section of the Florida rule which applies to the management of used oil filters. This part of the rule prohibits disposal of oil filters in landfills. Liquid Environmental Solutions uses oil or fuel filters in equipment such as the diesel diaphragm pump and the boilers. When these filters are replaced, the used filter is placed in a drum with an appropriate label. When this drum is filled, we will send it off site for disposal to a registered used oil filter processor such as Clark Environmental. Alabama has no regulation regarding disposal of used oil filters. Liquid Environmental Solutions does manage accordingly.

2.3 Florida PCW Rule

The PCW rule is a Florida rule which allowed the management of petroleum contact water (PCW) outside RCRA. This rule took effect at the end of 1995. To handle PCW, a facility must either be a RCRA permitted operation or be permitted as a used oil management facility. Liquid Environmental Solutions handles PCW as a permitted used oil processor. ADEM does not regulate PCW or has a rule regarding PCW.

2.4 Other Requirements

Pursuant to the regulations, Liquid Environmental Solutions is required to have a used oil analysis plan and an SPCC plan (refer to 4.2). Copies of these are available from your supervisor.

2.5 Summary of the Rules and Regulations Applicable to Used Oil

New and current drivers need to understand the federal and state regulations governing used oil. Attached at the end of this Manual is a brief summary of these regulations, referenced from FDEP's website.

3.0 Used Oil Analysis Plan

This Plan sets forth the specific procedures Liquid Environmental Solutions must follow to analyze used oil to be sure it is acceptable to us, to record our used oil activities, track shipments of used oil, and manage residues associated with our used oil activity. Drivers, Lab and oil dock personnel deal with these requirements on a daily basis. Process personnel should be aware these requirements exist. You will get hands on experience with at least some of the requirements in connection with receiving lab work.

This Plan can be located in Attachment C.5 of the Used Oil Processing Facility Permit Renewal Application.

4.0 SPCC and Contingency Plans

4.1 Spill Avoidance and Emergency Response Procedures

Attached at the end of this Manual are procedures for spill avoidance and emergency response in the case of a release of used oil on company premises or during transport or while at the customer site, also referenced from FDEP's website.

4.2 SPCC and Contingency Plans

Liquid Environmental Solutions has had an emergency response plan since 1991. The old plan was developed to meet RCRA requirements. It has been modified to meet the requirements of the new used oil rules. Most Liquid Environmental Solutions plant and lab employees have had emergency response training. We will update this training from time to time to be sure everyone who requires this training has it.

These Plans can be located in Attachment C.6&7 of the Used Oil Processing Facility Permit Renewal Application.

5.0 Documentation of Training

The regulations require that Liquid Environmental Solutions receive acknowledgement of training from all employees who are required to have this training. This training becomes part of your personnel records and is a part of your formal training.

Each new employee will be trained within one month of employment on federal and state rules governing used oil, spill control and halogen testing. New drivers transporting used or reprocessed oil will be trained on the applicable laws and rules before unsupervised driving of a used oil transportation vehicle.

All employees will be trained once per year on federal and state rules governing used oil, spill control and halogen testing.

Records of the training with employee name, date of training, and signatures of the employee and trainer will be kept with the company records for a minimum of 3 years and will be available for inspection by the FDEP.

LES USED OIL TRAINING

This certifies that the LES employee whose name and signature appear below has completed the used oil training pursuant to the LES Used Oil Training Manual.

Employee: _____

Signature: _____

Date: _____

This training was conducted by

Name: _____

Title: _____

Signature: _____

6.0 Closing Remarks

In recent years, Liquid Environmental Solutions has had an excellent record of operating in a manner which has safeguarded both Liquid Environmental Solutions employees and the environment.

Liquid Environmental Solutions personnel are responsible for appropriate handling of millions of gallons of material each year. Some of this material is potentially harmful to human health and the environment. Our success in handling this material appropriately results from having conscientious, responsible employees who have the experience and training necessary to handle the materials safely and effectively.

We commend you for your past efforts and look forward to many more years of safe, sound work together.

A Brief Summary of the Rules and Regulations Applicable to a Used Oil Transporter Training Program

Note: The following summary is provided in an attempt to simplify some of the legal language found in the Laws, Rules and Regulations pertaining to the management of used oil in Florida. This summary is incomplete and not comprehensive. Only certain parts of the applicable citations are summarized here. This is not a substitute for and does not replace the actual language found in the Laws, Rules and Regulations cited. For copies of the original documents, please contact the Used Oil Coordinator, FDEP, 2600 Blair Stone Road, MS 4560, Tallahassee, FL, 32399-2400; or phone (850) 245-8755.

Both State and federal regulations apply to the management of used oil. The federal regulations are found in Chapter 40, Part 279 of the Code of Federal Regulations (CFR) (to view go to http://www.gpoaccess.gov/cfr/index.html). The State laws regarding used oil are found in Chapter 403.75 through 403.769 of the Florida Statutes (F.S.) (Florida Statutes can be found at http://www.leg.state.fl.us/Statutes/index.cfm?Tab=statutes&submenu=-1&CFID=56371064&CFTOKEN=21118445). The specific management standards for used oil in Florida are found in Chapters 62-701 (Solid Waste Management Facilities) and 62-710 (Used Oil Management) of the Florida Administrative Code (F.A.C) (to view these rules go to http://www.dep.state.fl.us/waste/quick_topics/rules/default.htm).

A. Federal Rules (Code of Federal Regulations, C.F.R.)

1. **40 CFR, Part 279.40** This section (Subpart E) describes the used oil management standards which are applicable to used oil transporters (persons who transport used oil) and transfer facilities (facilities which store used oil for over 24 hours, but less than 35 days).

2. **40 CFR, Part 279.41** Transporters cannot process used oil.

3. **40 CFR, Part 279.42** Transporters must have an EPA identification number.

4. **40 CFR, Part 279.43** Transporters must deliver used oil to another transporter, processor or burner which has an EPA identification number. All discharges of used oil must be managed by taking immediate action to protect human health and the environment.

5. **40 CFR, Part 279.44** The transporter must use either product knowledge or testing to determine whether the halogen content of the used oil to be picked up is above or below 1,000 parts per million.

6. **40 CFR, Part 279.45** Used oil transporters are subject to all applicable Spill Prevention, Control and Countermeasures (40 CFR Part 112) in addition to the requirements of this subpart..

Used oil must be stored at a transfer facility which has notified (has an EPA identification number) and has secondary containment. Used oil cannot be stored at a transfer facility for longer than 35 days. (40 CFR, Part 279.45(a))

Containers and aboveground tanks used to store used oil at transfer facilities must be labeled clearly with the words "Used Oil"(40 CFR, Part 279.45(g))

7. **40 CFR, Part 279.46** Transporters must keep records of all used oil accepted and delivered for three years. The records must include the name, address, EPA identification number and signature of the person who provided or accepted the used oil, the quantity of used oil handled and the date of delivery.

B. Florida Law (Florida Statutes, FS.)

1. **§403.121** DEP may recover damages for any injury to the air, waters, or property of the State. DEP may impose a $10,000 penalty for each offense (**each day of violation is a separate offense**).

2. **§403.141** Anyone who pollutes may be held jointly and severally liable (anyone involved in the chain of custody, from the generator through the final destination can be held liable for the pollution).

3. **§403.161** It is a violation of state law to cause pollution, fail to comply with any laws or rules, make false statements regarding these laws and rules or fail to report discharges. There are three types of violations: a) anyone who willfully pollutes is guilty of a third degree felony, punishable by $50,000 and/or 5 years imprisonment for each offense; b) anyone who pollutes, due to reckless indifference or gross careless disregard, is guilty of a second degree misdemeanor, punishable by $5,000 and/or 60 days in jail for each offense; and c) anyone who fails to comply with any laws or rules is guilty of a first degree misdemeanor, punishable by $10,000 and/or 60 months in jail.

4. **§403.708 (1)** No person shall deposit any solid waste in or on the land or waters located within the State. **(14)** No person shall dispose of used oil in landfills.

5. **§403.751** No person may manage used oil in any manner which endangers public health or welfare. No person may discharge used oil into any storm drain, sewer, septic tank or body of water. No person may mix used oil with solid waste that is to be disposed of in a landfill. No person may mix used oil with a hazardous substance. Used oil shall not be used for road oiling, dust control, weed abatement or other similar activities that have the potential to harm the environment.

6. **§403.754** Used oil transporters and transfer facilities must register annually, keep appropriate records and report to the Department

7. **§403.7545** Nothing shall prohibit the Department from regulating used oil as hazardous waste. (If violations occur, and the used oil portion of the mismanagement, spill, or contaminated site is considered a hazardous waste, fines are automatically $50,000 per offense).

8. **§403.767** Anyone who transports more than 500 gallons of used oil over public highways must be certified by the Department. Certification includes demonstration of adequate training and insurance.

C. Department Rules (Florida Administrative Code, F.A.C.), found in:

62-701, F.A.C., Solid Waste Management Facilities/62-710, F.A.C., Used Oil Management

1. **62-701. 200** Training should include definitions of **(85)** oily wastes and **(129)** used oil.

2. **62-701.300 (8b)** No person shall dispose of used oil in a landfill. **(11)** No person may commingle used oil with solid waste that is to be disposed of in a landfill.

3. **62-710.401 (4)(5)** Prohibitions: No person may mix or comingle used oil with hazardous substances (exception found in 40 C.F.R.279.10(b)(3)); used oil shall not be used for pavement oiling for dust control, weed abatement, or other similar uses that have the potential to release used oil into the environment.

4. **62-710.500** Used oil transporters and transfer facilities must register with the Department.

5. **62-710.510** Used oil transporters must, on the appropriate forms, keep records (for three years) and provide an annual report to the Department. Any shipment of used oil which is refused pick-up due to

suspected mixing with hazardous waste (halogens above 1,000 parts per million) must be recorded; a copy of this record must be left with the generator.

6. **62-710.600** Used oil transporters who transport over 500 gallons per year over public highways must be Certified by the Department by showing evidence of adequate training and insurance.

7. **62-710.850** Persons involved in the management of used oil filters must comply with this section.

8. **62-710.901(2)** This Used Oil Record Keeping form, or another form with the same information, must be used and maintained on-site for three years.

SPILL AVOIDANCE AND EMERGENCY RESPONSE PROCEDURES FOR RELEASES OF USED OIL

Spill avoidance is best approached from a common sense viewpoint. Use your best judgment to determine the action to take. It is strongly recommended that all containers and tanks used to collect used oil be placed on a curbed, oil-impervious surface to contain any release of oil. **In the event of a release of oil (spill or leak) the owner or operator must do the following:**

1. Attempt to stop the source of the spill and begin initial containment procedures. The presence of an impervious liner beneath the collection/storage container may allow much of the spill to be contained and recovered. Containment may also be initiated using sorbent materials such as "kitty litter" , oil pads, or oil socks. If a small amount of oil should spill on the ground, the procedure which is usually advised is to remove the affected soil by shoveling it out into a container until no more oil is present. Check with your local landfill and ask if they will accept the material.

2. If the amount of oil spilled is more than 25 gallons, immediately contact the State Warning Point by phone at (850) 413-9911, or (800)320-0519.

3. Contact the DEP District Office nearest you and report the spill. The DEP would appreciate all spills be reported, even though the legal reportable quantity is 25 gallons. Ask the State Warning Point for technical assistance from the DEP representative if it is after normal business hours.

4. Technical guidelines will then be followed on a case-by-case basis during the cleanup.

Phone numbers for reporting spills are:

FEDERAL

National Response Center (24 hour)	(800) 424-8802 or (202) 267-2675
U.S. Coast Guard	check with the U.S. Coast Guard Office in your area

STATE

State Warning Point (24 hour)	(850) 413-9911 or (800) 320-0519

REPORT THE FOLLOWING INFORMATION:

1. Name, address and telephone number of person reporting.
2. Exact location of the spill.
3. Company name and location.
4. Material spilled.
5. Estimated quantity.
6. Source of the spill.
7. Cause of the spill.
8. Name of body of water involved, or the body of water nearest the spill area.
9. Action taken for containment and clean-up.

Florida Department of Environmental Protection

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

DEP Form #: 62-701.900(4), F.A.C.
Form Title: Application to Construct, Operate, or Modify a Waste Processing Facility
Effective Date: August 12, 2012
Incorporated in Rule: 62-701.710(2), F.A.C.

APPLICATION TO CONSTRUCT, OPERATE, OR MODIFY A WASTE PROCESSING FACILITY

GENERAL REQUIREMENT: Solid Waste Management Facilities shall be permitted pursuant to Section 403.707, Florida Statutes (F.S.) and in accordance with Florida Administrative Code (F.A.C.) Chapter 62-701. A minimum of four copies of the application shall be submitted to the Department District Office having jurisdiction over the facility. The appropriate fee in accordance with subsection 62-701.315(4), F.A.C., shall be submitted with the application by check made payable to the Department of Environmental Protection (DEP). Complete appropriate sections for the type of facility for which application is made and include all additional information, drawings, and reports necessary to evaluate the facility.

Please Type or Print in Ink

A. GENERAL INFORMATION

1. Type of facility (check all that apply):

☐ Transfer Station:

☐ C&D ☐ Class III ☐ Class I

☐ Other Describe: _____

☐ Materials Recovery Facility:

☐ C&D Recycling ☐ Class III MRF ☐ Class I MRF

☐ Other Describe: _____

☑ Other Facility That Processes But Does Not Dispose Of Solid Waste On-Site:

☐ Storage, Processing or Disposal for Combustion Facilities (not addressed in another permit)

☑ Other Describe: Industrial Solid Waste

NOTE: C&D Disposal facilities that also recycle C&D shall apply on DEP Form 62-701.900(6), F.A.C.

2. Type of application:

☐ Construction/Operation

☑ Operation without Additional Construction

3. Classification of application:

☐ New ☐ Substantial Modification

☑ Renewal ☐ Intermediate Modification

☐ Minor Modification

4. Facility name: Liquid Environmental Solutions of Florida, LLC

5. DEP ID number: FLD981928484 County: Duval

6. Facility location (main entrance): 1640 Talleyrand Avenue

Jacksonville, Florida 32206

7. Location coordinates:

Section: 8 Township: 2S Range: 27E

Latitude: 30 ° 20 ' 36 " Longitude: 81 ° 37 ' 46 "

Datum: _____ Coordinate Method: _____

Collected by: _____ Company/Affiliation: _____

8. Applicant name (operating authority): Liquid Environmental Solutions of Florida, LLC

Mailing address: 1640 Talleyrand Avenue (Street or P.O. Box) Jacksonville (City) FL (State) 32206 (Zip)

Contact person: Yuri Turovsky Telephone: (904) 438-2138

Title: Plant Manager yuri.turovsky@liquidenviro.com (E-Mail address (if available))

9. Authorized agent/Consultant: Mittauer & Associates, Inc.

Mailing address: 580-1 Wells Road (Street or P.O. Box) Orange Park (City) FL (State) 32073 (Zip)

Contact person: Kellen A. Lindsey Telephone: (904) 278-0030

Title: Project Engineer admin@mittauer.com (E-Mail address (if available))

10. Landowner (if different than applicant): A. Thomas Dudley, Sr.

Mailing address: 1010 E. Adams Street (Street or P.O. Box) Jacksonville (City) FL (State) 32202 (Zip)

Contact person: A. Thomas Dudley, Sr. Telephone: (904) 438-2138

_____ (E-Mail address (if available))

11. Cities, towns and areas to be served: N/A

12. Date site will be ready to be inspected for completion: _____

13. Estimated costs:

Total Construction: $_____ Closing Costs: $ _____

14. Anticipated construction starting and completion dates:

From: _____ To: _____

15. Expected volume of waste to be received: _____ yds^3/day _____ tons/day

16. Provide a brief description of the operations planned for this facility: Liquid Environmental Solutions of Florida, LLC has several treatment and storage tanks, a dissolved flotation, filter press unit and heat treatment capabilities to treat incoming wastewater and used oil. All units may be operated independently to achieve appropriate removal of solids. All tanks and auxiliary equipment are connected by steel piping.

B. ADDITIONAL INFORMATION

Please attach the following reports or documentation as required. See Attachment A

1. Provide a description of the operation of the facility that shall include (62-701.710(2)(a), F.A.C.):
   a. The types of materials, i.e., wastes, recyclable materials or recovered materials, to be managed or processed;
   b. The expected daily average and maximum weights or volumes of materials to be managed or processed;
   c. How the materials will be managed or processed;
   d. How the materials will flow through the facility including locations of the loading, unloading, sorting, processing and storage areas;
   e. The types of equipment that will be used;
   f. The maximum time materials will be stored at the facility;
   g. The maximum amounts of wastes, recyclable materials, and recovered materials that will be stored at the facility at any one time; and
   h. The expected disposition of materials after leaving the facility.

2. Attach a site plan, signed and sealed by a professional engineer registered under Chapter 471, F.S., with a scale not greater than 200 feet to the inch, which shows the facility location, total acreage of the site, and any other relevant features such as water bodies or wetlands on or within 200 feet of the site, potable water wells on or within 500 feet of the site (62-701.710(2)(b), F.A.C.).

3. Provide a boundary survey and legal description of the property (62-701.710(2)(c), F.A.C.).

4. Provide a construction plan, including engineering calculations, that describes how the applicant will comply with the design requirements of subsection 62-701.710(3), F.A.C. (62-701.710(2)(d), F.A.C.).

5. Provide an operation plan that describes how the applicant will comply with subsection 62-701.710(4), F.A.C. and the recordkeeping requirements of subsection 62-701.710(8), F.A.C. (62-701.710(2)(e), F.A.C.).

6. Provide a closure plan that describes how the applicant will comply with subsection 62-701.710(6), F.A.C. (62-701.710(2)(f), F.A.C.).

7. Provide a contingency plan that describes how the applicant will comply with subsection 62-701.320(16), F.A.C. (62-701.710(2)(g), F.A.C.).

8. Unless exempted by subparagraph 62-701.710(1)(d)1., F.A.C., provide the financial assurance documentation required by subsection 62-701.710(7), F.A.C. (62-701.710(2)(h), F.A.C.).

9. Provide a history and description of any enforcement actions by the applicant described in subsection 62-701.320(3), F.A.C. relating to solid waste management facilities in Florida. (62-701.710(2), F.A.C. and 62-701.320(7)(i), F.A.C.)

10. Provide documentation that the applicant either owns the property or has legal authorization from the property owner to use the site for a waste processing facility (62-701.710(2), F.A.C. and 62-701.320(7)(g), F.A.C.)

C. CERTIFICATION BY APPLICANT AND ENGINEER OR PUBLIC OFFICER

1. Applicant:

The undersigned applicant or authorized representative of Liquid Environmental Solutions of Florida, LLC is aware that statements made in this form and attached information are an application for a Solid Waste _____ Permit from the Florida Department of Environmental Protection and certifies that the information in this application is true, correct and complete to the best of his/her knowledge and belief. Further, the undersigned agrees to comply with the provisions of Chapter 403, Florida Statutes, and all rules and regulations of the Department. It is understood that the Permit is not transferable, and the Department will be notified prior to the sale or legal transfer of the permitted facility.

Signature of Applicant or Agent

Yuri Turovsky / Plant Manager
Name and Title (please type)

yuri.turovsky@liquidenviro.com
E-Mail address (if available)

1640 Talleyrand Avenue
Mailing Address

Jacksonville, Florida 32206
City, State, Zip Code

(904) 438-2138
Telephone Number

DEC 10 2012
Date

Attach letter of authorization if agent is not a governmental official, owner, or corporate officer.

2. Professional Engineer registered in Florida (or Public Officer if authorized under Sections 403.707 and 403.7075, Florida Statutes):

This is to certify that the engineering features of this waste 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 maintained and operated, will comply with all applicable statutes of the State of Florida and rules of the Department. It is agreed that the undersigned will provide the applicant with a set of instructions of proper maintenance and operation of the facility.

Signature

Joseph A. Mittauer, P.E. / President
Name and Title (please type)

23111
Florida Registration Number
(please affix seal)

JOSEPH A. MITTAUER LICENSE No. 23111 STATE OF FLORIDA PROFESSIONAL ENGINEER

580-1 Wells Road
Mailing Address

Orange Park, Florida 32073
City, State, Zip Code

admin@mittauer.com
E-Mail address (if available)

(904) 278-0030
Telephone Number

DEC 10 2012
Date

ATTACHMENT A – SOLID WASTE PROCESSING FACILITY DESCRIPTION

LIQUID ENVIRONMENTAL SOLUTIONS OF FLORIDA, LLC

Project No. 9122-34-1

Dated: November 2012

Liquid Environmental Solutions of Florida, LLC (LES) Jacksonville Facility (DEP ID No. FLD 981-928-484) generates industrial solid waste onsite from a variety of wastewater treatment processes, including: gravity separation, dissolved air flotation, filter press dewatering, and solidification. The solid waste generates from these processes is placed into 20-yard roll-off containers and shipped to an industrial landfill for disposal.

The quantity of solid waste generated and shipped offsite is approximately 150 tons per month. LES does not store any solid waste onsite.

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: November 19, 2012 Date of DEP Approval: _____

I. GENERAL INFORMATION: Latitude: 30°20'36"N Longitude: 81°37'46"W EPA ID Number: FLD 98 192848 4

Facility Name: Liquid Environmental Solutions of Florida, LLC Permit Number: 72815- HO-009

Facility Address: 1640 Talleyrand Avenue, Jacksonville, Florida 32206

Mailing Address: 1640 Talleyrand Avenue, Jacksonville, Florida 32206

Contact Person's Name: Yuri Turovsky Phone Number: (904) 438-2138
Fax Number: (904) 353-0374

Email: yuri.turovsky@liquidenviro.com

II. TYPE OF FINANCIAL ASSURANCE DOCUMENT (Check Type)

X Letter of Credit* ____ Performance Bond* ____ Guaranty Bond*

____ Insurance Certificate ____ Financial Test ____ Trust Fund Agreement

*Indicate mechanisms that require use of a Standby 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: _____

_____	X	_____	=	_____
Latest DEP approved Closing Cost Estimate		Current Year Inflation Factor		Inflation Adjusted Annual Closing Cost Estimate

Signature: _____ Phone: (904) 438-2138

Name and Title: Yuri Turovsky / Plant Manager E-Mail: yuri.turovsky@liquidenviro.com

If you have questions concerning this form, please contact the Used Oil Permitting Coordinator at the address below, by phone at (850) 245-8781, or by E-Mail at: Bheem.Kothur@dep.state.fl.us

Please mail this completed cost estimate to:

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

Please email or mail a copy of the cost estimate to:

Solid.Waste.Financial.Coordinator@dep.state.fl.us
Solid Waste Financial Coordinator
MS 4565
FDEP
2600 Blair Stone Road
Tallahassee, FL 32399-2400

☒ **(b) Recalculated Cost Estimates (complete items IV and V)** See Attachments

/. RECALCULATIONS OF CLOSING COSTS

For the time period in the facility's operation when the extent and manner of its operation makes closing **most expensive**.

Third Party Estimate/Quote must be provided for each item.
Costs must be for a third party providing all materials and labor.

DESCRIPTION	UNIT	QUANTITY	UNIT COST	TOTAL
1. Decontamination and Disposal Note: These costs must be broken down by individual waste stream. If contamination is found, the cost estimate must be recalculated to include remediation costs.				
a. Used Oil tanks, containers, piping, equipment and secondary containment decontamination				
waste characterization				
disposal				
b. Wash water waste characterization				
disposal				
c. Sludges/ sediment waste characterization				
disposal				
d. Used oil filter management waste characterization				
disposal				
e. Petroleum Contaminated Water (PCW), tanks, containers, piping, equipement and secondary containment waste characterization				
disposal				
f. Mobilization Costs				
g. other_____				
Subtotal (1) Decontamination/Disposal:				

2. Engineering (on-site inspections and Quality Assurance are to be included in this item).

a. Closure sampling and analysis plan implementation as described in the permit application _____

b. Closure Certification Report _____

Subtotal (2) Professional Services: _____

Subtotal of (1) and (2) Above: _____

3. Contingency (10% of the Subtotal) _____

Closing Cost Subtotal: _____

TOTAL CLOSING COST: _____

V. CERTIFICATION BY ENGINEER and OWNER/OPERATOR

This is to certify that the Financial Assurance Cost Estimates pertaining to the engineering features of the this solid waste management facility have been examined by me and found to conform to engineering principals applicable to such facilities. In my professional judgment, the Cost Estimates are a true, correct and complete representation of the financial liabilities for closing of the facility, and comply with the requirements of Florida Administrative Code (F.A.C.), Rule 62-701.630 and all other Department of Environmental Protection rules, and statutes of the State of Florida. It is understood that the Financial Assurance Cost Estimates shall be submitted to the Department **annually** between January 1 and March 1of each year and revised, adjusted and updated as required by Rule 62-701.630(4), F.A.C.

DEC 10 2012

Signature of Engineer

Joseph A. Mittauer, P.E./President

Engineer's Name and Title (please print or type)

23111

Florida Registration Number (please print or type)

580-1 Wells Road, Orange Park, FL 32073

Engineer's Mailing Address

(904) 278-0030

Engineer's Telephone Number

admin@mittauer.com

Engineer's email address

Signature of Owner/Operator

Ed Jesus / Regional Vice President

Owner's Name and Title (please print or type)

(904) 438-2138

Owner/Operator's Telephone Number

ed.jesus@liquidenviro.com

Owner/Operator's E-Mail Address

Closure Cost Estimate Summary - Liquid Environmental Solutions of Florida, LLC

Tank Description	Assembly/Line	Quantity	Unit	Unit Cost	Local Cost Factor	Total
Decon Tanks	33 17 0823					
66 Regulated Tanks	01957 3106%	640	Hour	$41.70	$0.81	$22,000.00
High Pressure Wash						
Sludge/Wash Loading	33 19 0101	14	Each	$365.59	$0.81	$4,000.00
110,000 Gallons	02083 6152					
5,000 gallon tanker						
Transport to Treatment Facility	33 19 0207	1,400	Miles	$1.81	$0.81	$2,000.00
100 Miles Round Trip	02083 7304					
Treatment (OW) Liquid Disposal	33 19 7103	682,394	Gallons	$0.22	$0.81	$122,000.00
Diesel Tank # 21 (for Hot Oil Heater)		7,840	Gallons	$0.00	$0.81	$0.00
Liquid = 90% of Total Volume	2560 8031					
Disposal Sludges	33 19 7265	75,822	Gallons	$0.75	$0.81	$46,000.00
Diesel Tank # 21 (for Hot Oil Heater)		7,840	Gallons	$0.00	$0.81	$0.00
Sludges = 10% of Total Volume	13278 1213					
Sample Analysis						
Soils (Closure Plan 12 Samples)		12	Each	$300.00	$0.81	$3,000.00
Sludges (1 Sample)		66	Each	$300.00	$0.81	$16,000.00
Washwater/Contact Water		66	Each	$300.00	$0.81	$16,000.00
Closure Plan, 1 Sample in Each Tank						
Decon Containment	33 17 0823	640	Hour	$41.70	$0.81	$22,000.00
by High Pressure Wash	01957 3106					
Total (10,000 Square Feet)						

SUBTOTAL	$253,000.00
Supervision and Administration (S&A) - 20%	$51,000.00
SUBTOTAL with S&A	$304,000.00
Contingency - 10%	$30,000.00
TOTAL CLOSING COST (2008 Costs):	$330,000.00
2012 TOTAL CLOSING COST (Adjusted for Inflation):	$363,000.00

Tank	Closure Capacity	Purpose	Regulated	Regulated Capacity	Less 2% (Overflow)	Man Hours
1	27,270	OW	Yes	27,270	26,725	10
2	27,270	OW	Yes	27,270	26,725	10
3A	15,000	OW	Yes	15,000	14,700	10
3B	15,000	OW	Yes	15,000	14,700	10
4A	10,000	O	Yes	10,000	9,800	10
4B	20,000	O	Yes	20,000	19,600	10
6	**62,000**	**OW**	**Yes**	**62,000**	**60,760**	**10**
7	22,000	W	No			
8	22,000	W	No			
9	23,000	W	No			
10	4,800	O	Yes	4,800	4,704	10
12	7,800	O	Yes	7,800	7,644	10
14	9,750	O	Yes	9,750	9,555	10
16	16,075	O	Yes	16,075	15,754	10
17	1,200	VIRGIN FUELS	Yes			10
18	9,950	O	Yes	9,950	9,751	10
19	7,800	O	Yes	7,800	7,644	10
20	7,800	O	Yes	7,800	7,644	10
21	8,000	VIRGIN FUELS	Yes			10
22	7,800	O	Yes	7,800	7,644	10
23	9,950	O	Yes	9,950	9,751	10
24	15,000	O	Yes	15,000	14,700	10
25	15,000	O	Yes	15,000	14,700	10
26	15,000	O	Yes	15,000	14,700	10
27	15,700	O	Yes	15,700	15,386	10
30	500	W	No			
31	10,000	W	No			
32	12,000	W	No			
33	12,000	W	No			
34	12,000	W	No			
35	10,000	W	No			
35A	11,650	W	No			
36	20,000	W	No			
37	20,000	W	No			
38	30,000	W	No			
39	30,000	W	No			
51	15,000	O	Yes	15,000	14,700	10
52	15,000	O	Yes	15,000	14,700	10
53	85,000	O	Yes	85,000	83,300	10
54	19,000	O	Yes	19,000	18,620	10
55	9,750	O	Yes	9,750	9,555	10
56	20,000	O	Yes	20,000	19,600	10
60	12,000	S	Yes	12,000	11,760	10
61	8,000	S	Yes	8,000	7,840	10
62	8,000	S	Yes	8,000	7,840	10
70	9,500	S/OW	Yes	9,500	9,310	10
71	6,500	OW	Yes	6,500	6,370	10
72	6,500	OW	Yes	6,500	6,370	10
81	**5,000**	**PCW**	**Yes**	**5,000**	**4,900**	**10**
82	**5,000**	**PCW**	**Yes**	**5,000**	**4,900**	**10**
83	**5,500**	**OW**	**Yes**	**5,500**	**5,390**	**10**
84	**5,500**	**OW**	**Yes**	**5,500**	**5,390**	**10**
85	**6,000**	**OW**	**Yes**	**6,000**	**5,880**	**10**
86	**6,000**	**OW**	**Yes**	**6,000**	**5,880**	**10**
87	**6,000**	**OW**	**Yes**	**6,000**	**5,880**	**10**
88	6,000	OW	Yes	6,000	5,880	10
89	10,000	S	Yes	10,000	9,800	10
90	10,000	S	Yes	10,000	9,800	10
91	5,000	OW	Yes	5,000	4,900	10
92	5,000	OW	Yes	5,000	4,900	10
93	12,000	S/OW	Yes	12,000	11,760	10
94	12,000	S/OW	Yes	12,000	11,760	10
95	4,000	S	Yes	4,000	3,920	10
96	4,000	S	Yes	4,000	3,920	10
98	12,000	W	No			
101	6,000	O	Yes	6,000	5,880	10
102	**14,000**	**OW**	**Yes**	**14,000**	**13,720**	**10**
103	**14,000**	**OW**	**Yes**	**14,000**	**13,720**	**10**
104	**14,000**	**OW**	**Yes**	**14,000**	**13,720**	**10**
105	**14,000**	**OW**	**Yes**	**14,000**	**13,720**	**10**
106	**14,000**	**OW**	**Yes**	**14,000**	**13,720**	**10**
107	**14,000**	**OW**	**Yes**	**14,000**	**13,720**	**10**
108	**14,000**	**OW**	**Yes**	**14,000**	**13,720**	**10**
109	**14,000**	**OW**	**Yes**	**14,000**	**13,720**	**10**
		Ancillary Equipment		**758,215**	**743,051**	
40	N/A	Heat Exchanger	N/A		N/A	
44	10,000	Oil Separator	Yes	10,000	9,800	10
45	2,000	DAF Unit	Yes	2,000	1,960	10
45A	1,000	DAF Inlet	Yes	1,000	980	10
47	4,200	DAF Clarifier	Yes	4,200	4,116	10
50	N/A	Heat Exchanger	Yes	N/A	N/A	N/A
97	1,000	Filter Press Precoat	Yes	1,000	980	10
99	1,000	Lime Slurry	No			
Totals	**1,033,765**			**776,415**	**760,887**	**640**
Tanks	**80**			**66**	**66**	

Tank Legend	Number of Tanks	Total Volume	Less 2%
O	22	342,175	335,332
FUEL	2		
OW	23	316,540	310,209
PCW	2	10,000	9,800
S	7	56,000	54,880
S/OW	3	33,500	32,830
W	15		
	74	758,215	743,051

DEP Permitted Tanks

Wells Fargo Bank, N.A.
U. S. Trade Services
Standby Letters of Credit
MAC D4004-012
401 Linden Street, 1st Floor
Winston-Salem, NC 27101
Phone: 1(800) 776-3862 Option 2
E-Mail: sblc-new@wellsfargo.com

Amendment To
Irrevocable Standby Letter Of Credit

Number : IS0009130
Amendment Number : 001
Amend Date : November 8, 2012

BENEFICIARY	APPLICANT
DIRECTOR, DIVISION OF WASTE MANAGEMENT FLORIDA DEPARTMENT OF ENVIRONMENTAL PROTECTION BOB MARTINEZ CENTER 2600 BLAIR STONE ROAD MS 4565 TALLAHASSEE, FLORIDA 32399-2400	LIQUID ENVIRONMENTAL SOLUTIONS OF FLORIDA, LLC 1640 TALLEYRAND AVENUE JACKSONVILLE, FLORIDA 32206

LADIES AND GENTLEMEN:

AT THE REQUEST AND FOR THE ACCOUNT OF THE ABOVE REFERENCED APPLICANT, WE HEREBY AMEND OUR IRREVOCABLE STANDBY LETTER OF CREDIT (THE "WELLS CREDIT") IN YOUR FAVOR AS FOLLOWS:

- THE AMOUNT IS INCREASED BY $96,345.00 TO A NEW TOTAL AMOUNT OF $363,000.00.

.

- IN ACCORDANCE WITH THE AUTO-RENEW PROVISION CONTAINED IN THE LETTER OF CREDIT, THE EXPIRATION DATE HAS BEEN EXTENDED TO DECEMBER 31, 2013.

ALL OTHER TERMS AND CONDITIONS REMAIN UNCHANGED.

THIS AMENDMENT IS TO BE ATTACHED TO THE ORIGINAL WELLS CREDIT AND IS AN INTEGRAL PART THEREOF.

Very Truly Yours,

WELLS FARGO BANK, N.A.

By: _____
Authorized Signature

The original of the Letter of Credit contains an embossed seal over the Authorized Signature.

Please direct any written correspondence or inquiries regarding this Letter of Credit, always quoting our reference number, to **Wells Fargo Bank, National Association,** Attn: U.S. Standby Trade Services

at either One Front Street
MAC A0195-212,
San Francisco, CA 94111

or 401 Linden Street
MAC D4004-017,
Winston-Salem, NC 27101

Phone inquiries regarding this credit should be directed to our Standby Customer Connection Professionals

1-800-798-2815 Option 1
(Hours of Operation: 8:00 a.m. PT to 5:00 p.m. PT)

1-800-776-3862 Option 2
(Hours of Operation: 8:00 a.m. EST to 5:30 p.m. EST)

Appendix A

Liquid Environmental Solutions of Florida, LLC
DEP Used Oil Processing Facility Permit Renewal
Mittauer & Associates, Inc. Project No. 9122-34-1

Sludge Dryer Closure Report

SLUDGE DRYER CLOSURE REPORT

USED OIL PROCESSING FACILITY PERMIT
72815-HO-007

FOR

INDUSTRIAL WATER SERVICES, INC.

JACKSONVILLE, FLORIDA

Submitted by:

SHAUNTE STALLWORTH, COMPLIANCE MANAGER
INDUSTRIAL WATER SERVICES, INC.
Jacksonville, Florida
November 28, 2007

Sludge Dryer Closure Report
Used Oil Processing Facility Permit # 72815-HO-007
Industrial Water Services, Inc.
Jacksonville, Florida

Closure of Tank 48, Sludge Dryer

Background

Industrial Water Services, Inc. (IWS) owns and operates an industrial used oil/wastewater pretreatment facility in Jacksonville, Florida. The IWS facility is permitted by the Department of Environmental Protection to operate as a used oil processor through the Used Oil Processing Facility Permit No. 72815-HO-007. The closing of tank 48 in this permit is defined by 40 CFR 279.54(h) and 62-710.800(9), F.A.C.

IWS, Inc. submitted an initial written request to Mr. Bheem Kothur of FDEP, Division of Waste Management to close tank 48 in Attachment A of the Used Oil Processing Facility Permit on September 14, 2007. Upon approval, the completion date of the closing of tank 48 was agreed to be October 30, 2007. On October 12, 2007, IWS, Inc. had to request an extension on the approved closure schedule to properly dispose of entrapped oil discovered in various parts of the dryer. Mr. Kothur approved the new completion date of the closing of the dryer to be November 30, 2007.

Analytical Review

Industrial Water Services, Inc submitted composite rinseate samples to Summit Environmental Technologies, Inc. after each piece of equipment was tripled rinsed required in Part V: Closure Requirements of the Used Oil Processing Facility Permit. In

reviewing the report, the data showed that there were no hazardous constituents present and IWS deemed the material to be non-hazardous waste. There were presence of Barium at a level of 0.046 ppm, however it posed no threat to be potentially classified as D005 per 40 CFR 261.24 (b). Since we are appropriately permitted non-hazardous waste water pretreatment facility, it was cost effective for us to process our own non-hazardous waste water from the closure of the unit.

Disposal of Metallic Contents of Dryer

IWS, Inc. is submitting copies of weight tickets of the scrap metal from the Sludge Dryer unit to meet the requirement of Part V- Closure Requirement for recordkeeping. The Sludge Dryer Unit metal was intentionally sold to a scrap dealer, Berman Brothers, Inc., to keep the material from being used for application, such as drinking water tanks. Table 1 below illustrates the characteristics of the metal sold or disposed of, and provide an inventory of certain equipments/parts that was retained for future application in the plant.

Table 1: Disposal Table for the Dryer Closure

Item Description	**Net Weight (lbs)**	**Quantity**	**Retained or Disposed/Sold**	**Disposal Date**
Red Brass	240	----------	Disposed/sold	11/14/07
Steel	8520	----------	Disposed/sold	11/14/07
Steel	6960	----------	Disposed/sold	11/14/07
Steel	5960	----------	Disposed/sold	11/14/07
Steel	10780	----------	Disposed/sold	11/15/07
Steel	3420	----------	Disposed/sold	11/16/07

Electric motor	----------	2	Retained	11/14/07
Control switch	----------	2	Retained	11/14/07
8-in. diameter schedule 20 pipe (stack)	----------	1	Retained	11/14/07

Industrial Water Services, Inc has completely removed the dryer and its ancillary equipment. All parts that were not retained for future use in the facility were sold to Berman Brothers, Inc. for scrap. Throughout the process of dismantling the unit, photographs were taken to document the process of the closure procedures. The Used Oil Processing Facility Permit has been modified to reflect the closure of the dryer stated in this report. Analytical reports and weight tickets have been provided to reflect that IWS, inc. has met all the requirements stated in Part V- Closure Requirement listed in the Used Oil Processing Facility Permit No. 72815-HO-007.

Appendix B

Liquid Environmental Solutions of Florida, LLC
DEP Used Oil Processing Facility Permit Renewal
Mittauer & Associates, Inc. Project No. 9122-34-1

JEA Categorical Industrial User Discharge Permit #019

Industrial Pretreatment

CATEGORICAL
INDUSTRIAL USER DISCHARGE PERMIT #019

In accordance with the provisions of JEA's *Industrial Pretreatment Regulation*:

Liquid Environmental Solutions of Florida LLC
(hereinafter referred to as "Permittee"), located at
1640 Talleyrand Avenue

is hereby authorized to discharge industrial wastewater from the above location into the District I (Buckman) Publicly Owned Treatment Works (POTW), in accordance with the conditions set forth in this permit. Compliance with this permit does not relieve Permittee of its obligation to comply with any or all applicable pretreatment regulations, standards or requirements under local, State and Federal laws, including any such regulations, standards, requirements, or laws that may become effective during the term of this permit. Noncompliance with any term or condition of this permit shall constitute a violation of JEA's *Industrial Pretreatment Regulation* and may subject Permittee to enforcement action pursuant thereto.

This permit shall become effective on: **February 01, 2009**.

This permit shall expire at midnight on: **February 01, 2013**.

The deadline to apply for permit reissuance is: **October 01, 2012**.

This permit was modified on: **January 1, 2010**.

Daniel Parnell, Manager
Industrial Pretreatment