



June 17, 2013

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

RE: **FCC Environmental, LLC, Pompano Beach Florida Facility**  
**EPA ID No. FLD 065 680 613**  
**Used Oil Processor Permit 0030676-HO-005**  
**Permit Renewal Applications**

Dear Mr. Kothur:

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

Should you have questions please contact me at 813-335-5341 or email at [scott.crandall@fccenvironmental.com](mailto:scott.crandall@fccenvironmental.com).

Respectfully  
FCC Environmental LLC



Scott Crandall, PE  
Regional EH&S Director

Cc: FDEP Southwest District Office

105 South Alexander St, Plant City Florida 33563

**FCC Environmental  
Plant City, FL  
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# APPLICATION FORM FOR A USED OIL PROCESSING FACILITY PERMIT

## Part 1

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

### A. General Information

1. New \_\_\_\_\_ Renewal XX Modification \_\_\_\_\_ **Date old permit expires 08/20/2013**
2. Revision number   1
3. NOTE: Processors must also meet all applicable subparts, **(describe compliance in process description for applicable standards)** if they are:
  - generators (Subpart C)
  - XX transporters (Subpart E) under EPA ID TXR 000 078 094
  - burners of off-spec used oil (Subpart G)
  - XX marketers (Subpart H)
  - or
  - XX disposing of used oil (Subpart I)
4. Date current operation began: 5/1/1980
5. Facility Name: FCC Environmental, LLC
6. EPA identification number: FLD 065 680 613
7. Facility location or street address: 105 S. Alexander Street, Plant City, FL 33563
8. Facility mailing address: 105 S. Alexander Street, Plant City, FL 33563
9. Contact person: Angelo Pousa: (813)-754-1504 Title: Area Manager  
Mailing address: 105 S. Alexander Street, Plant City, FL 33563
10. Operator's name: FCC Environmental, LLC Telephone: 281-668-3300  
Mailing address: 523 N. Sam Houston Parkway East, Suite 400, Houston, TX 77060
11. Facility owner's name: FCC Environmental, LLC Telephone: 281-668-3300  
Mailing address: 523 N. Sam Houston Parkway East, Suite 400, Houston, TX 77060
12. Legal Structure:
  - XX corporation (indicate state of incorporation) Delaware
  - individual (list name and address of each owner in spaces provided below)
  - partnership (list name and address of each owner in spaces provided below)
  - other, e.g. government (please specify) \_\_\_\_\_

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

Name: \_\_\_\_\_

Mailing Address: \_\_\_\_\_

Name: \_\_\_\_\_

Mailing Address: \_\_\_\_\_

Name: \_\_\_\_\_

Mailing Address: \_\_\_\_\_

Name: \_\_\_\_\_

Mailing Address: \_\_\_\_\_

13. Site ownership status: ☒ owned ☐ to be purchased ☐ to be leased \_\_\_\_\_  
[ ] presently leased; the expiration date of the lease is:

If leased, indicate:

Landowner's name: NA

Mailing address: NA

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

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

Associated with: FCC Environmental, LLC

## **B. SITE INFORMATION**

1. Facility location: 105 S. Alexander Street, Plant City, FL 33563

Co unty: Hillsboro

Nearest community: Plant City, FL

Latitude: 28° 0'42.8" N Longitude: 82° 08' 21.1" W

Section: 30 Township: 28S Range: 22E

UTM # : 17 387997.0 3098871.8

2. Facility size(area in acres): 10.0

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

**C. OPERATING INFORMATION**

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

2. List Applicable EPA hazardous waste codes:

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

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

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

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

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

5. The following parts of the facility's operating plan should be included as attachments to the permit application. (See item 5 on pages 4 and 5):

a. An analysis plan which must include:

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

**The analysis plan is labeled as Attachment 3**

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

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

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

**The tracking plan is included as Attachment 5**

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

**The preparedness and prevention plan is labeled as Attachment 6**

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

**The contingency plan is labeled as Attachment 6**

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

**The unit management description is labeled as Attachment 7**

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

**The closure plan is labeled as Attachment 8**

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

**A description of employee training is labeled as Attachment 9**

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

## APPLICATION FORM FOR A USED OIL PROCESSING PERMIT

### PART II - CERTIFICATION

TO BE COMPLETED BY ALL APPLICANTS

#### Form 62-710.901(a). Operator Certification

Facility Name: FCC Environmental, LLC EPA ID# FLD 065 680 613

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

Signature of the Operator or Authorized Representative\*



Scott Crandall, Director of EHS

Name and Title (Please type or print)

Date: 06/17/13 Telephone: 813 335-5341

\* If authorized representative, attach letter of authorization.

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

## APPLICATION FROM FOR A USED OIL PROCESSING PERMIT

### PART II - CERTIFICATION

#### Form 62-710.901(b). Facility Owner Certification

Facility Name: FCC Environmental, LLC EPA ID# FLD 065 680 613

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

  
 Signature of the Facility Owner or Authorized Representative\*

Scott Crandall, Director of EHS

Name and Title (Please type or print)

Date: 06/17/13 Telephone: 813 335-8341

\* If authorized representative, attach letter of authorization.



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

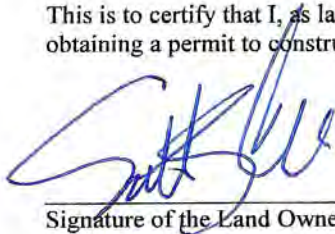
## APPLICATION FROM FOR A USED OIL PROCESSING PERMIT

### PART II - CERTIFICATION

#### Form 62-710.901(c) Land Owner Certification

Facility Name: FCC Environmental, LLC EPA ID# FLD 065 680 613

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



\_\_\_\_\_  
Signature of the Land Owner or Authorized Representative\*

Scott Crandall, Director EHS

\_\_\_\_\_  
Name and Title (Please type or print)

Date: 06/17/13 Telephone: 813 335-5341

\* If authorized representative, attach letter of authorization.

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

## APPLICATION FORM FOR A USED OIL PROCESSING PERMIT

### PART II - CERTIFICATION

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

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

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

Please Print or Type

\_\_\_\_\_ Initial Certification        X   \_\_\_\_\_ Recertification

1. DEP Facility ID Number: FLD 065 680 613      2. Tank Numbers: Table 1

3. Facility Name: FCC Environmental, LLC

4. Facility Address: 105 S. Alexander St., Plant City, FL 33563

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

  
\_\_\_\_\_  
Signature

Scott Crandall

\_\_\_\_\_  
Name (please type)

Florida Registration Number: 44650

Mailing Address: 105 South Alexander St.

Street or P. O. Box		
Plant City	FL	33563
City	State	Zip

Date: 06/17/13      Telephone 813 335-5341

**[PLEASE AFFIX SEAL]**

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

April 25, 2011

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

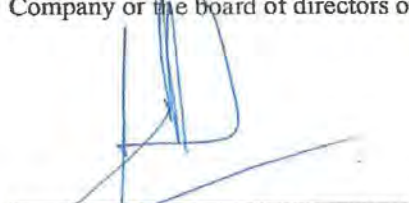
I, Aurelio Blasco Lazaro, hereby certify that I am President of the Company and that as such I am authorized to sign documents and to certify on behalf of the Company the accuracy and completeness of information in such documents. Pursuant to the power vested in me, I hereby

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

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

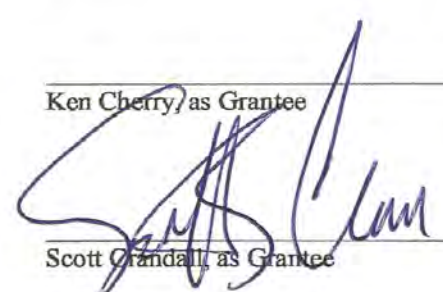
Each of Ken Cherry and Scott Crandall as signatory below (each, a "Grantee") and independent of one another, all the powers and duties assigned to make, execute, authenticate, acknowledge and deliver any environmental permit, license, or other related documentation or certifications, or renewals thereof,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

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

  
\_\_\_\_\_  
Aurelio Blasco Lazaro, its President

Grantee:

  
\_\_\_\_\_  
Ken Cherry, as Grantee

  
\_\_\_\_\_  
Scott Crandall, as Grantee

---

**FCC ENVIRONMENTAL, LLC  
PLANT CITY, FLORIDA  
ATTACHMENT 1  
FACILITY DESCRIPTION**

FCC Environmental, LLC (FCC) is a full service environmental remediation company specializing in a complete array of extraction, decontamination, transport, and treatment services. Fomento de Construcciones y Contratas, S.A. of Spain acquired Hydrocarbon Recovery Services Inc. (HRSI) and the International Petroleum Corporation of Delaware (IPC) in March of 2008 from the Siemens Water Technologies Corporation. HRSI changed its legal name to FCC on July 1, 2010. The FCC Plant City facility, located in Hillsborough County, is registered with the Florida Department of Environmental Protection (FDEP) as a used oil/used oil filter transfer facility, processor, marketer and off-specification fuel oil burner. In addition, the facility had a solid waste transfer station permit issued on May 7, 2009.

The Plant City facility is comprised of a used oil recycler, an industrial water pretreatment facility and storage tanks for the handling of used oil, used oil filter crushing operations, petroleum contact water and oily wastewater business. Materials are brought to the facility primarily by FCC; however, third party deliveries from common carriers or independent used oil transporters may be accepted in accordance with the Waste Analysis Plan (see Attachment 3). FCC is a registered used oil and used oil filter transporter in addition to a State approved hazardous waste transporter.

The main plant operations are oil recycling, which includes atmospheric and vacuum distillation, industrial water pretreatment using a dissolved air flotation (DAF) unit, and truck and railcar unloading and loading. Used oil filter management is also performed at the site, which includes crushing, oil extraction, and bulking of scrap metals for recycling. Recycled oils processed in the facility are sold as burner fuel (for energy recovery) and flotation oils (for recovery of phosphates), thus completing the full recycling of used oil.

The FCC Plant City facility has 23 registered and regulated tanks: 14 in the South Tank Farm (1, 2, 3, 4, 5, 6, 7, 8, 9, 10, 11, 12, 20V, 24k); 8 in the West Tank Farm (C1, C2, C3, 552, 20KV, 30KV, 10k, D5k); and 1 self-contained (630). In addition there are two (2) non-regulated tanks sharing the West Tank Farm area (10V, 82V) and a refinery/water treatment containment area with process equipment including 2 non-regulated tanks (SKE, SKW). All are aboveground storage tanks constructed of steel and equipped with secondary containment. Storage tank registrations have been obtained by





FCC and are kept on file at the facility. All tanks are kept in compliance with 62-762 Florida Administrative Code.

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

The following vehicles are usually parked at the Plant City facility: 8 tanker trailers, 6 tanker trucks, 4 vacuum trucks, 5 box trucks, 6 tractors, 4 storage trailers, 3 pick ups, and 1 flatbed.

FCC-Plant City currently has 35 employees related to the oil business (including sales or accounting staff). The names of the Plant City employees are provided in tabular form in Attachment 9, along with FCCs training requirements.

### **MATERIALS PROCESSED**

The materials processed at the Plant city facility are discussed below.

#### **Used Oil and Contaminated Petroleum Products**

Used oil and contaminated petroleum products including off-specification virgin fuels, are processed for recycling as an on-specification (as defined by 40 CFR 279.11) fuel oil using a multi-stage distillation system (See Process Description, Attachment 2). Water that is distilled from the used oil is pretreated in the wastewater pre-treatment unit prior to discharge to the Plant City POTW (under Industrial User effluent Permit No. 05-2008). The light distillate, comprised of primarily naptha, is burned in the furnace on-site to provide energy for the recycling process (see Waste Analysis Plan, Attachment 3, and Tracking Plan, Attachment 5).

#### **Used Oil Filters**

Used oil filters are drained, crushed/cubed and shipped off-site for metal recycling. FCC may receive uncrushed or pre-crushed filters from customers or other FCC Florida facilities for processing and subsequent recycling activities. The oil recovered from the used filters is recovered and recycled with the used oil that is received from off-site generators (see Tracking Plan, Attachment 5).

#### **Petroleum Contact Waters**

Per Florida Statute 376.303, 403.721, and Florida Administrative Code 62-740.030 (Definitions) “Petroleum Contact Water” or “PCW” means water-containing product.



“Product” means petroleum product as defined in Section 376.301(16) F.S. By definition, PCW is a product, or water in contact with product which displays a visible sheen contained in spill containment and secondary containment areas associated with petroleum tank storage, petroleum transportation, and petroleum distribution systems. Other examples of PCW (as defined by F.A.C.) include:

1. Condensate from underground and above ground petroleum storage tanks;
2. Water bottoms or drawdown water from a petroleum tank system as defined in Chapters 62-761 and 62-762 F.A.C.;
3. Petroleum tank filler sump and dispenser sump water;
4. Recovered product or water in contact with product, which does not contain hazardous constituents other than petroleum, from first response action to petroleum spills or from petroleum contaminated site cleanups under Chapter 62-770 F.A.C.;
5. Above ground petroleum tank seal leakage water; and
6. Pumpable liquids from petroleum tank cleaning operations.

FCC receives all six different above referenced PCW type water/product. PCW is pretreated in the wastewater pre-treatment unit (D.A.F.) prior to discharge to Plant City POTW. Product recovered during pretreatment is recycled with other recovered used oil.

#### **Waste Antifreeze (Glycol and Water Mixtures)**

Used antifreeze and antifreeze contaminated with used oil is received by the Plant City facility for recycling. FCC does not accept used antifreeze that fails a TCLP or that is RCRA regulated. Antifreeze contaminated with used oil may be processed with used oil in the distillation system. Recovered antifreeze is bulked prior to being transported for off-site recycling. Bulked antifreeze is sent via tanker truck or rail car to a licensed recycle facility.

#### **Petroleum Contaminated Material: (oily wastes per 62-710.201, FAC)**

Oily wastes, as defined in 62-710.201, FAC, are materials that are mixed with used oil and have become separated from that used oil. Oily wastes also means materials, including wastewaters, centrifuge solids, filter residues or sludges, bottom sediments, tank bottoms, and absorbents which have come in contact with, and have been contaminated by, used oil. This definition includes materials such as oily rags, granular absorbent, absorbent clay and other organic absorbent material (from Florida fact sheet, 06-02-97, management of used oil and used oil filters).

Other oily wastes such as soils, sludges, absorbents and other materials containing recoverable used oil are processed by FCC. Any oil recovered from this material is handled in the facility's used oil process. The recovered solids are bulked, profiled, sampled as needed, transported for disposal in either a State permitted landfill or thermal treatment facility.

Petroleum contaminated soils, sludge, debris, personal protective equipment (P.P.E.) or other non-hazardous waste streams are managed by FCC under the Solid Waste Transfer Station Permit. Solid wastes, that do not contain recoverable used oil are received in drums and offloaded at the solid waste transfer station (southeast area). (Drums containing oil filters are separated and handled according to the Used Oil Filter process.)

Table 1

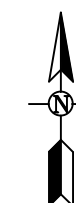
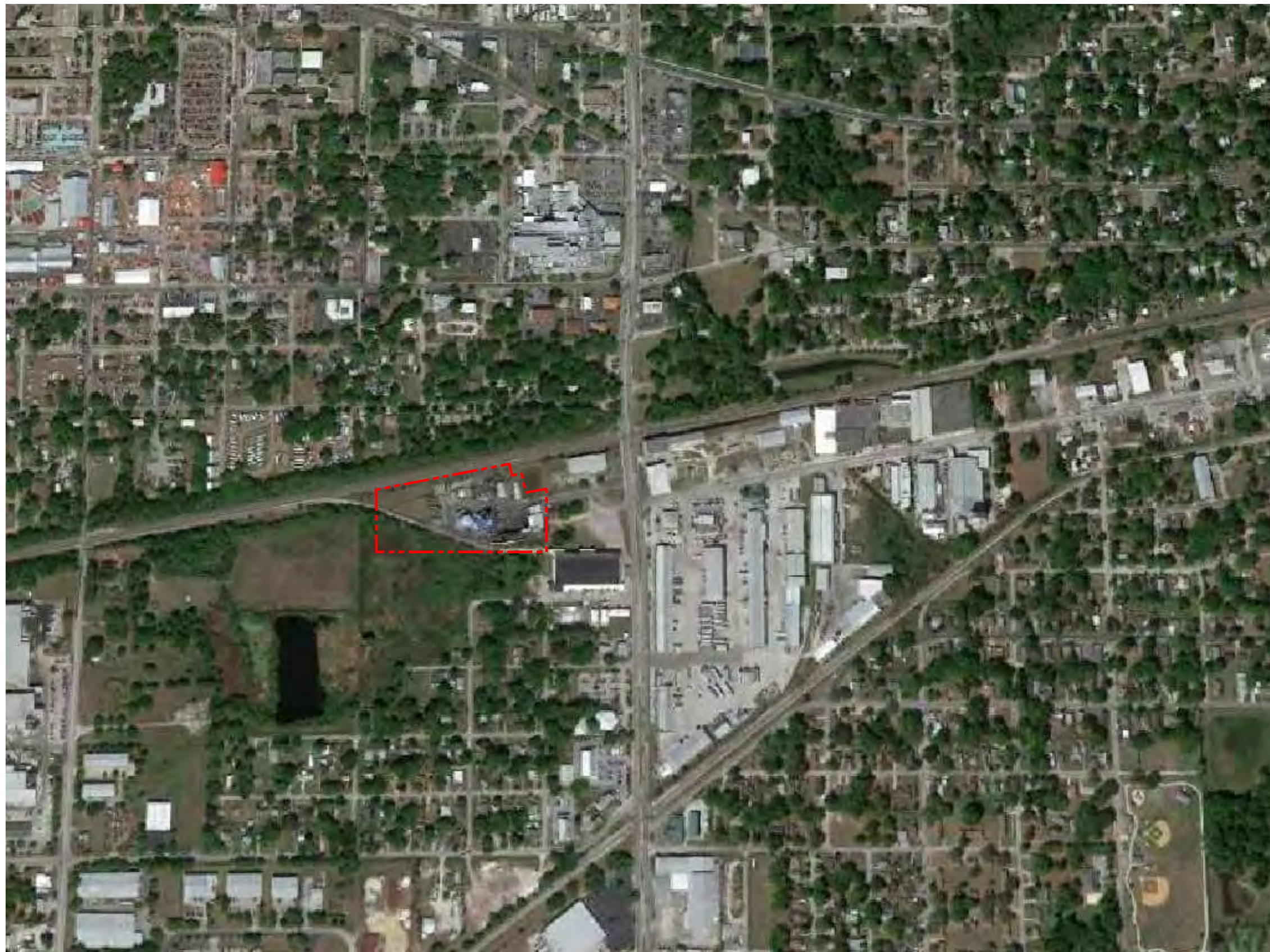
**Summary of Aboveground Storage Tanks  
FCC Environmental – Plant City Facility  
Plant City, Florida**

<b>Tank ID Number</b>	<b>Volume (Gallons)</b>	<b>Material Stored</b>	<b>Alternate Material Stored*</b>	<b>Date Installed</b>
<b><i>South Tank Farm</i></b>				
1	14,700	Residual Oils, 5	Antifreeze	5/1980
2	14,700	Used Oil	Residual Oils, 5	5/1980
3	15,000	Used Oil	Residual Oils, 5	5/1980
4	15,000	Used Oil	Residual Oils, 5	5/1980
5	15,000	Used Oil	Residual Oils, 5	5/1980
6	18,800	Used Oil	Residual Oils, 5	5/1980
7	14,100	Used Oil	Residual Oils, 5	5/1980
8	14,100	Used Oil	Residual Oils, 5	5/1980
9	14,700	Used Oil	Residual Oils, 5	5/1980
10	14,700	Used Oil	Residual Oils, 5	5/1980
11	18,800	Used Oil	Residual Oils, 5	5/1980
12	24,000	Used Oil	Residual Oils, 5	5/1980
20V	20,700	Antifreeze	Used Oil	5/1980
24K	24,000	Used Oil	Residual Oils, 5	5/1980
<b><i>West Tank Farm</i></b>				
C1	30,000	Used Oil	Residual Oils, 5	6/2005
C2	30,000	Used Oil	Residual Oils, 5	6/2005
C3	30,000	Used Oil	Residual Oils, 5	6/2005
552	500,000	Number 5 Oil		7/1989
20KV	20,000	Used Oil	Residual Oils, 5	7/1989
30KV	30,000	Used Oil	Residual Oils, 5	5/1989
10K	10,000	Truck Diesel	Residual Oils, 5	7/1989
D5K	5,000	Oily Water	Residual Oils, 5	1/1999
10V	10,000	Rainwater (non-regulated)		7/1989
82V	8,200	Rainwater (non-regulated)		7/1989
<b><i>Refinery Area</i></b>				
SK-W	44,650	Oily Water (non-regulated, wastewater treatment/processing)		7/1987
SK-E	44,650	Oily Water (non-regulated, wastewater treatment/processing)		9/1987
<b><i>Tank T-630 “Tank within a Tank”</i></b>				
T-630	630,000	Used Oil	Residual Oils, 5	9/1999

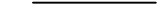
\*Tank may be cleaned and used to alternate materials as needed. Tank labeling is changed when materials stored are changed.







**LEGEND:**



SUBJECT PROPERTY

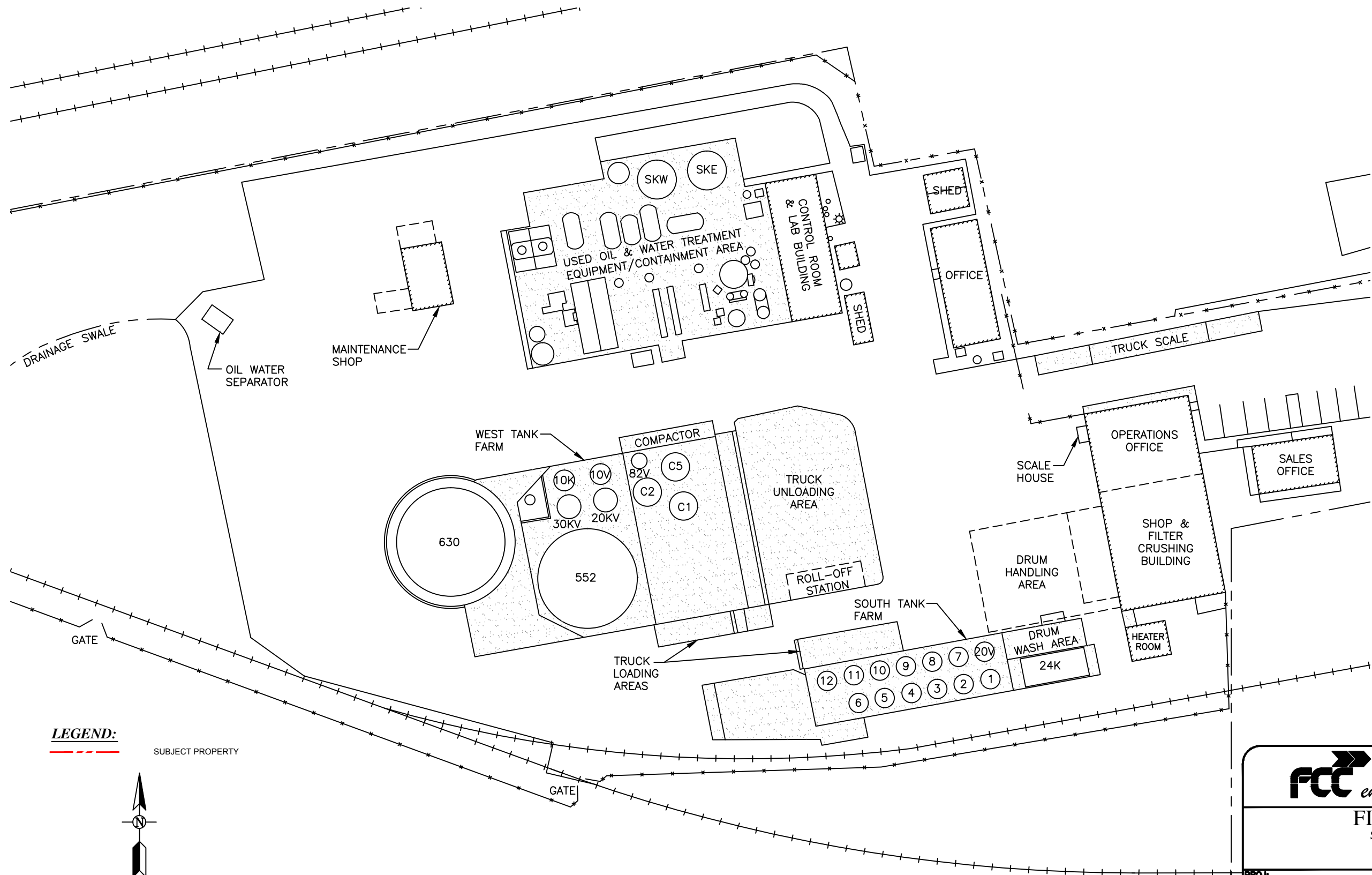


**FIGURE 1**  
SITE VICINITY MAP

PROJ: PLANT CITY SOLID WASTE  
MANAGEMENT FACILITY  
PLANT CITY, FLORIDA

THIS IS NOT A LEGAL SURVEY VERIFY SCALE 0 NTS IF NOT 1" ON THIS SHEET, ADJUST SCALES ACCORDINGLY.	DRN BY: DCB	DATE: 6/5/13
	CHKD BY: SC	SCALE: N.T.S.
	FILE NAME: SITE PLAN 1	





**LEGEND:**

--- SUBJECT PROPERTY

0' 50' 100' 200'

SCALE : 1" = 100'

**FIGURE 2**  
SITE PLAN

<b>PROJ:</b> PLANT CITY SOLID WASTE MANAGEMENT FACILITY PLANT CITY, FLORIDA			
THIS IS NOT A LEGAL SURVEY VERIFY SCALE 0 50'	DRN BY: DCB CHKD BY: SC FILE NAME:	DATE: 6/5/13 SCALE: 1" = 50' SITE PLAN 1	



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**FCC ENVIRONMENTAL, LLC  
PLANT CITY, FLORIDA  
ATTACHMENT 2  
PROCESS DESCRIPTION**

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

FCC occupies the address at 105 South Alexander Street and operates the fleet, under the same business name, which collects used oils, oily wastes, PCWs, off-specification fuels, used oil filters and antifreeze from generators and transports them to the facility. The same fleet is used to deliver recycled/refined products to customers. The Waste Analysis Plan describes the sampling and analysis of used oils, oily wastes, antifreeze, products and byproducts.

When first entering FCC (off Alexander Street in Plant City), the operations office/garage is located on the left (see attached Site Maps presented as Figure 1 and 2). On the left (to the south) are the storage tanks 24K, 1-12 and 20V, some of which are used as day tanks and some of which are used for blending of virgin petroleum products with recycled on-specification used oil. The west tank farm, across from the facility's entrance, is where tanks C1, C2 and C3 cone-bottom day tanks are located. The West Tank Farm contains tanks 552, C1, C2, C3, 30 KV, 20 KV, 10K, D5K and non-regulated tanks 10V and 82V. Tank 552 on the south side of the west tank farm stores the recycled on-specification No. 5 fuel oil. Day tanks C1, C2 and C3 store used oil and oily water. Tank 630 is located behind the west tank farm and is the primary storage of used oil (Tanks 2, 3, 4, 7, 8, and 9 may serve as day tanks). On the north side of the property is the oil processing area, which includes the water treatment plant, laboratory and control room. The petroleum tank storage areas are illustrated in the Spill Prevention, Countermeasure and Control Plan (see Attachment 6), which shows the tanks, locations, identification numbers, and a corresponding table identifying capacity.

For materials picked up by FCC, all used oil and oily wastes are first checked in the field using halogen-screening equipment prior to acceptance into the Plant City facility (see Waste Analysis Plan, Attachment 3). All third party deliveries are checked for halogen content again upon arrival at the facility and prior to offloading. Upon arrival at the facility, and prior to offloading, the halogen content may again be checked by facility personnel (per the Waste Analysis Plan). In addition, the materials may be checked for percent water and flashpoint. Upon delivery to Plant City, incoming materials may be transferred via above ground piping to isolated day tanks, Tanks C1, C2, C3, 2, 3, 4, 6, 7,

8, 9, 10, 11 or 12 (all marked “Used Oil”), and analyzed for the presence of Polychlorinated Biphenyls (PCBs) as a composite sample daily. Only when analytical results showing that the material contains no PCBs have been received will the material be transferred to Tank T-630 (marked “Used Oil”).

All petroleum and processing piping is aboveground. Off-loading may be conducted via a pumping system equipped with filter baskets to remove the large particles (up to 40 Mesh). Filter media or lint is periodically cleaned out, drummed or bulked, characterized and sent for disposal.

## ***OIL PROCESSING***

Flow of the oil in tank T-630 comes from a pipeline at the dead bottom or 2-1/2 foot elevation and is sent to the oil processing area. Since tank T-630 utilizes a circulating pump, the oil is distributed and mixed uniformly from the bottom to the top (resulting in a homogenous mixture). When oil first enters the processing area, it goes through an atmospheric column, then through a vacuum distillation column, and is pumped to tank 30 KV. The operators monitor water by distillation and flash point of the dehydrated oil during production. The processed oil is then transferred (typically once a day) from tank 30 KV to tank 552, where it is sampled and tested daily for the used oil on-specification criteria (see Waste Analysis Plan). After the oil has met all of the on-specification criteria, the oil in the tank is released for shipment or further blending.

FCC produces two primary re-processed oil products; a fuel oil that is equivalent to virgin No. 5 Fuel Oil, and a flotation oil for the phosphate mining industry. Both products meet the USEPA criteria for on-specification used oil fuel. The No. 5 Fuel Oil may be blended with other virgin fuels to make a variety of customer-specific fuels.

Water distilled from the used oil is pumped to tanks SKW and SKE. This water is pretreated prior to discharge according to the Industrial User Effluent Permit.

Any vapor that is not condensed is combusted in the thermal oil heater that provides heat for the recycling process. The light hydrocarbons that are condensed (comprised mostly of naptha) are low flashpoint, distillate that is utilized as the primary fuel in the heater. These distillates are a byproduct of used oil processing to produce recycled fuel oil and are often burned onsite as fuel as a co product. While there is not explicit regulatory definition of the term “co-product,” the preamble of the 1985 definition of solid waste considered a co-product, as distinct from a by-product, under RCRA. The preamble describes co-products as “materials produced intentionally, and which in their existing state are ordinarily used as commodities in trade by the general public” (50 FR 625, January 4, 1985). The heater is operated under a FDEP-approved Hillsborough County EPC Air Operating Permit (0570296-006-AO). The application for the air permit included a detailed description of both the liquid fuels and the non-condensed vapor



burned in the heater. Annual air stack monitoring is performed on the heaters emissions, as required by the air permit.

### ***USED OIL FILTERS***

Used oil filters are received crushed or un-crushed in 55-gallon drums or other approved DOT containers. The drummed oil filters are stored in or outside the garage area (southeast area of property, please see the Site Maps at the end of this attachment). Drums of uncrushed filters are dumped onto a conveyor and are mechanically processed to produce “cubes”. The filter processor has a sump area that collects the oil drained during the process. Crushed filters are visually inspected and are either drained and dumped directly into bins or are mixed with uncrushed filters and mechanically cubed. Deliveries of crushed filters are manually searched for any uncrushed filters, which are removed and mechanically cubed. The cubes are deposited in bins that are shipped off site for metal recycling. Oil recovered from this process is screened (see Waste Analysis Plan) and transferred to Tank T-630 for recycling. Used oil filters are stored in aboveground containers that are clearly labeled “Used Oil Filters” and are in good condition. The storage containers are sealed (by keeping the bung caps closed) and stored on an impermeable surface (concrete in the garage or sealed asphalt outside the garage). Any discharge is stopped, contained, and managed, and the container is repaired or replaced as necessary. Granular absorbent, absorbent pads, and booms are available in the area to ensure immediate response to any spill that may occur.

### ***WASTEWATER***

Wastewater including petroleum contact water, industrial water, facility-generated secondary containment waters (displaying a sheen), and water distilled out of the used oil is accumulated in tanks SKW and SKE prior to pretreatment in the wastewater treatment unit and ultimate treatment by the Plant City POTW. The wastewater treatment process consists of composition equalization (in SKE and SKW), gravity separation, chemical treatment, flocculation, coagulation, and dissolved air flotation. Any oil recovered by gravity separation or dissolved air flotation is pumped to Tank-630 for recycling along with the used oil.

### ***ANTIFREEZE***

Waste antifreeze with a low water/oil concentration may be directly off-loaded and sent to Tank 1 or Tank 20V. Phase separation may be conducted prior to further processing, recovered antifreeze is sent to Tank 1 or 20V. The recovered water fraction containing a *de minimus* amount of the glycol is treated and sent to the POTW. The glycol in the

water discharged to the POTW is easily biodegraded and does not pass through the POTW. The majority of the glycol and any oil, additives, or heavy metals contained in the glycol remain with the re-refined oil product.

### ***OILY WASTES***

Oily Wastes, such as solids containing recoverable oil, may be received in drums and processed to recover any petroleum. Drums containing a large amount of free flowing oil may be directly vacuumed/pumped out. Drums containing a low amount of free flowing oil may be bulked in a roll-off box and drained by gravity or bulked in a compactor to enhance oil recovery. The roll-off box is located on an impervious surface (concrete), which is contained (with curbing), and equipped with a sump/pump (which is connected to the tank farm) to recover any residuals. The remaining facility-generated solid waste is bulked and transported off site to a State-permitted landfill for disposal or thermal treatment facility. Recovered petroleum is recycled with the other used oils.

### ***PRODUCT BLENDING***

Tested, on-specification used oil may be blended or stored in Tanks 5, 6, 10, 11, 12 or 24K with other virgin fuels to make a variety of different viscosity and sulfur content fuels to meet customer demands. Circulation pumps are used for mixing high viscosity virgin fuels with lighter recycled oils in Tanks 6, 10, 11, 12 and 24K.

### ***PETROLEUM CONTAMINATED SOLID WASTE***

Petroleum-contaminated solid waste determined to be non-hazardous is handled by the facility on a consolidation bulking basis under the facility's Solid Waste Transfer Station Permit. In some cases, a covered roll off may be used for bulk products such as petroleum contaminated soil.

### ***DECANTING***

The amount of solids accumulated in Tanks T-630, 30 KV, 552, SKE and SKW is controlled by decanting a fraction of the shipments of oily water, waste oil or used oil that the facility receives. Tanks D5K (5,000 gallon capacity) and C1 (30,000 gallon capacity) serve as decanting tanks and are registered as containing oily water and used oil, respectively.

Those incoming shipments that are high in solids (approximately 10 percent or greater by volume) are unloaded into Tank D5K or C3. Typical shipments may include materials from petroleum spill sites, pits, sumps, or fluid from oil/water separators, as defined by

62-761 and 62-770 F.A.C. The shipments will be screened as identified by the waste analysis plan.

After the shipment of oily water, used oil or waste oil has had the opportunity to stabilize or separate in Tank D5K, the location of the different phases of oil, water and solids will be determined. Sampling and materials removal connections are located approximately 4 inches, 10.5 inches, 25 inches, 41.5 inches, 64.5 inches, 88.5 inches and 113 inches above the tank bottom. The oil phase will be pumped to Tank T-630, and the water phase to Tanks SKE and SKW. Solids (e.g., sediment, twigs, leaves) will be allowed to accumulate on the tank bottom until such time ready for bulking and shipping to a State-permitted landfill or thermal treatment unit. In some rare cases, a customer may opt to have the solids returned and be the agent for the proper disposal of the cited solids.

Stormwater discharge associated with industrial activity requires a permit under 40 CFR Part 122.23(a)(ii). FCC – Plant City discharges stormwater to surface waters by virtue of a Multi-Sector Generic Permit for Stormwater Discharge Associated with Industrial Activity (FLR05F746).



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**FCC ENVIRONMENTAL, LLC  
PLANT CITY, FLORIDA  
ATTACHMENT 3  
WASTE ANALYSIS PLAN**

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

FCC accepts used oil and non-hazardous oily wastes as defined under 40 CFR 279, and 62-710.201 FA.C. This addresses the following non-hazardous materials recycled, reclaimed, and/or managed by FCC, including:

- Industrial and non-industrial used oil and oily-water mixtures
- Waste oil and waste oil-water mixtures managed as used oil
- Non-industrial used oil filters (UOFs)
- Absorbents and industrial filters
- Other petroleum-contaminated debris, as defined under FAC 62-710.201
- Used antifreeze

***USED OIL AND OILY WASTES***

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

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

FAC 62-710.201 defines oily wastes as those materials that are mixed with used oil and have been separated from that used oil. Oily wastes include wastewaters, centrifuge solids, filter residues or sludge, bottom sediments, tank bottoms, and sorbents that have come in contact with, and have been contaminated by, used oil and may be appropriately tested and discarded in a manner that is in compliance with other state and local requirements. Any oil wastes or sludge generated at the facility that cannot be managed for energy recovery will require a hazardous waste determination and the materials shall be managed in accordance with 40 CFR Part 279.10 (c) and (e).



## **WASTE CHARACTERIZATION**

Prior to acceptance of the waste, generators must provide FCC with a complete characterization, including analytical results, or certification of generator process knowledge of the waste. While analytical data provide the most definitive information regarding the concentration levels of hazardous constituents and other characteristics of the waste, FCC may accept a waste stream at the facility based, in whole or in part, on detailed waste-specific information obtained from the generator of that waste. When a generator wishes to use process knowledge in characterizing its waste, FCC requires the generator to state its claim in writing prior to accepting that waste.

## **PICK-UP/PUMP OUT**

The driver/operator of a FCC vehicle utilized to transport used oil or oily waters may take a retain sample at each pick-up/pump. Retain samples are collected in a poly sample container and are labeled with the customers name, date, container ID (if more than one retain is taken at a site). The driver must then:

1. Verify that the material being removed conforms to the physical properties of used oil or contains an oily sheen.
2. Identify the used oil category as industrial, automotive, or mixed, as described by State of Florida Regulations.
3. Screen the material with a hand held halogen meter and/or Dexsil Q1000 (or other equivalent testing) to determine if the used oil contains chlorinated compounds. Any stream that fails the halogen meter screen (a positive reading for the hand held halogen meter calibrated 900ppm) will be tested with Dexsil Q1000 (or equivalent). Halogen meters are calibrated conservatively to 900 PPM. In the event of a positive reading on the halogen meter, the used oil will be tested with a Dexsil Q-1000 or equivalent to confirm or refute the reading over 1,000 PPM halogens.
  - a. Results of the halogen screen will be recorded on the shipping document, along with the required generator information.
  - b. Any stream that fails both the halogen meter screen and Dexsil Q1000 (or equivalent) test will not be picked up until the retained sample (accompanied by a Chain-of-Custody) can be tested for TOX (Total Organic Halide) by either an Oxford LabX3500 (known as XRF or EPA Method 9075) or Gas Chromatograph (GC), as required, at one of FCC's laboratories, or until the generator supplies certified laboratory results and/or process knowledge sufficient to rebut the hazardous waste presumption, as outlined in 40 CFR 279.44.



## ***FACILITY OFF-LOADING***

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

1. Collect a sample at the terminal using a tank thief prior to unloading. The sample will be checked to verify that the material conforms to the physical properties of used oil, as defined in 40 CFR 279 and FAC 62.710.200.
2. The sample will be screened by the on-site laboratory for chlorinated compounds content using either Oxford LabX3500 (known as XRF or EPA Method 9075) or Dexsil Q1000 (EPA Method 9077) or other equivalent testing kit, and for percent water by distillation. The results will be recorded on the incoming load log for all material received, including third-party deliveries. Used oil that passes the halogen screening is unloaded to either one of the day tanks (Tanks C1, C2, C3, 2, 3, 4, 7, 8, or 9) or tank T-630.
  - a. Any stream that fails either the XRF or the Dexsil Q1000 (or equivalent) test will be segregated until sufficient information is obtained necessary to rebut the hazardous waste presumption, as outlined in 40 CFR 279.44.
  - b. If the hazardous waste presumption for a load cannot be rebutted successfully, the material will be rejected as non-conforming and will be managed by doing one of the following:
    - 1) The shipping document will be marked as non-conforming, and the load will be returned to the generator.
    - 2) In the event of commingled oil from route collections, if determined to be hazardous waste, lab waste analysis will be conducted to identify the hazardous constituents that may classify the material as hazardous waste. The material will remain on the route oil truck and will not be offloaded into the facility. The load will be profiled to the proper disposal facility and upon acceptance will be transported to the designated TSDF in accordance with 40 CFR Subtitle C. The retain samples will be used to determine which customer is the generator of the hazardous waste oil. The customer will be the generator of the hazardous waste will sign the manifest and work with FCC Environmental to ensure proper disposal.



## **ABSORBENTS, FILTERS, AND OILY WASTES**

The driver/operator of a FCC vehicle used to transport industrial and non-industrial absorbent, filter streams, and other incoming oil-contaminated solids must at each pick-up/pump out verify that the material contains visible oil.

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

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

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

The two categories of materials may be stored and tested separately. Waste characterization completed for absorbents and oily wastes testing include generator process knowledge and analytical chemistry for RCRA 8 metals and 8260 volatiles. All freely recoverable oil is removed from the containers prior to shipping for disposal.

## **USED ANTIFREEZE**

To ensure compliance with the Florida DEP's May 2012 Antifreeze Guidance Best Management Practices for Managing Used Antifreeze at Vehicle Repair Facilities, FCC will not require any analytical on used antifreeze that is sent for recycling. FCC will require analytical on used antifreeze that is sent for disposal for lead, benzene, trichloroethylene and tetrachloroethylene.

The driver/operator of a FCC vehicle used to transport antifreeze must at each pick-up/pump out verify that the material is examined for pH, visual color and odor. Any significant difference, then the antifreeze will not be loaded on the truck.

Prior to unloading any antifreeze, the antifreeze may be sampled and tested for pH, visual color and odor. Used antifreeze is off-loaded and bulked in an aboveground storage tank. Once a bulk load of antifreeze is accumulated, the used antifreeze is sent off site for recycling.

## **PETROLEUM CONTACT WATER (PCW)**

Upon pick-up/pump-out, the driver will take a representative sample of the petroleum contact water (PCW), which is a mixture of virgin fuel and water, with a drum or tank



thief and test for pH. PCW does not meet the definition of used oil since it has not been used.

### ***INDUSTRIAL WASTEWATER***

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

Industrial wastewater is the other wastewater (in addition to PCW) which may or may not contain used oil. Prior to pick-up/pump-out, the driver will take a representative sample using a drum or tank thief and conduct a field pH test. Upon receipt at the facility, the laboratory may resample and conduct a bench top simulation of the wastewater pretreatment process to determine if an individual stream can successfully be treated directly in the wastewater treatment process. Samples that result in clarified water are said to respond well. Shipments that respond well in the bench top test are unloaded into Tanks SKE or SKW. Those samples that do not respond well in the bench top test are unloaded into the used oil feed tank, T-630, and the water is steam-stripped out of the emulsion along with the other used oil.

Large solids in the wastewater are removed by strainers as the truck is unloaded. Fine solids are recovered along with any petroleum in the DAF and are blended with the used oil for recycling.

### ***PETROLEUM CONTAMINATED MATERIALS***

FCC will only accept materials that are determined to meet landfill or thermal treatment criteria and are not regulated under 40 CFR Chapter 1 Part 261 (62-730 FAC) as a hazardous waste. Generators must provide FCC with a complete characterization including analytical results or certification of generator process knowledge of the waste prior to the acceptance. While analytical data provide the most definitive information regarding the concentration levels of hazardous constituents and other characteristics of the waste, FCC may accept a waste stream based, in whole or part, on detailed waste-specific information obtained from the generator of that waste. When a generator wishes to use process knowledge in characterizing its waste, FCC requires the generator to state its claim in writing prior to accepting that waste. When generator knowledge is used, backup documentation will be obtained from the customer such as MSDSs, chemical handling descriptions, published waste analysis or studies, etc. will be obtained to verify the generator knowledge is correct. Upon pick-up, the driver will verify that the material conforms to the characteristics provided by the generator during the pre-approval process.



## ***MATERIAL STORAGE***

All materials are stored in aboveground tanks registered with the FDEP, as required by FAC 62-762, or in DOT-approved shipping containers. The tanks are labeled “Used Oil” and have the appropriate NFPA labels affixed. Tanks containing antifreeze are labeled “Antifreeze” and have the appropriate NFPA label. Drums are labeled with non-hazardous shipping labels (or other approved FCC labeling that contain generator information, date, and material description).

## ***ON-SPECIFICATION CLAIM***

Used oil fuels are processed at the FCC facility using chemical and physical means to obtain an on-specification used oil fuel. The used oil fuel is constantly being processed and is not produced in specific batches. The finished product is sent to Tank 552 where it is sampled daily for on-specification parameters daily prior to sale or further blending. The sample is collected and analyses performed by a FCC laboratory or an outside NELAC-certified laboratory and used to verify the conformance with the on-specification used oil requirements in 40 CFR 279.11. The on-specification oil is kept separate from any used oil. If analysis indicates that the on-specification parameters have been exceeded, the process is stopped, and the oil is transferred back to the used oil feed tank for further recycling. A copy of the sample analysis report for on-specification oil is included as part of this attachment. The table on the following page lists the parameters and methods used for testing.

### **Methods of Analysis**

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



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

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

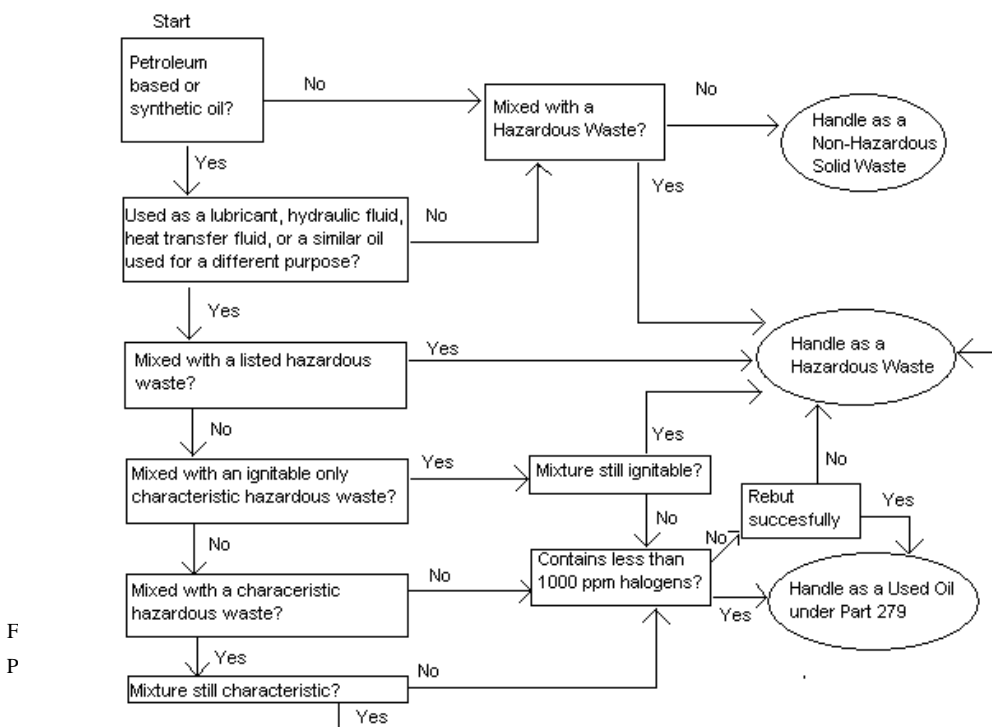
### 40CFR 279.11 On-Specification Criteria

Parameter	Value/Units	Limit
Flashpoint	100 °F	Minimum
Total Halogens	4000ppm	Maximum
Total Arsenic	5ppm	Maximum
Total Cadmium	2ppm	Maximum
Total Chromium	10ppm	Maximum
Total Lead	100ppm	Maximum
PCB	2ppm	Maximum

### RECORDS

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

### Used Oil Determination Flow Chart



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**FCC ENVIRONMENTAL, LLC  
PLANT CITY, FLORIDA  
ATTACHMENT 4  
SLUDGE, RESIDUE, AND BYPRODUCT MANAGEMENT  
DESCRIPTION**

***SLUDGE AND FILTER SOLIDS***

Sludge, residue and by-products from filters, tank bottoms and or storage tank, etc., are removed as needed, on a frequency dependent upon the volumes (layers) in the tanks rather than the frequency of oil and oily waste received and processed at the facility. The sludge and sump solids come from filter baskets and pump sumps. These materials are commingled and taken to the shaker screen, and may be washed with hot water and/or light oil such as kerosene. This washing procedure minimizes the quantity of waste that must be shipped off-site for disposal and eliminates any free liquid that may have been with the solids. Filtrate from the shaker screen is collected and pumped to Tank T-630 for recycling with the other used oil. In 1993, the facility conducted TCLP (8 RCRA) metals analysis of the resulting solid waste over a five-month period, and determined the waste stream to be non-hazardous. The process has not changed; therefore, the hazardous waste determination is made only annually to verify any changes in the documented TCLP parameters.

Sludge residues, filter basket solids, and other residues are shipped in bulk to a State permitted landfill or thermal treatment (waste to energy) facility. Any wastes that contain free liquids will be tested for flashpoint prior to shipment. If the flashpoint results show that the material is not a characteristic hazardous waste, it may be sent to a State-permitted facility for solidification and/or ultimate disposal at a Treatment, Storage, and Disposal Facility (TSDF).

Solid material or residue that accumulates over time in the bottom of separation vessels, pump trucks, or tankers is removed and analyzed for Florida pre-burn constituents, as defined in FAC Chapter 62.713.501(4). Solids that are within the 40 CFR 261 limits are stabilized with an inert organic material (such as saw dust, granular/clay absorbent, etc.) and are sent for disposal as a non-hazardous waste at a secured landfill or sent for thermal treatment. Solids that exceed the 40 CFR 261 criteria for classification as a characteristic hazardous waste are placed in appropriate containers disposed at an off-site licensed TSDF. Any material sent to a TSDF is accompanied by a hazardous waste manifest.

A tank farm sludge management plan has been developed whereby three tanks (under 40,000-gallons) containing regulated petroleum products will be investigated every six months for the quantity of sludge present. When the sludge quantity is more than 10-20





percent of the total tank volume, the tank will be cleaned and a sample of the sludge will be collected for analysis. The analytical testing will include, at minimum, TCLP 8 RCRA Metals, TCLP Volatiles. Other parameters may be analyzed when deemed appropriate. Any tanks over 40,000-gallons will be addressed when emptied for integrity testing.

Any solids determined to exceed the 40 CFR 261 criteria for classification as a characteristic hazardous waste are disposed at an off-site licensed TSDF. Each material sent to the TSDF is accompanied by a hazardous waste manifest.

#### ***CRUSHED OIL FILTERS***

Oil filter scrap steel is bulked into approximately 4,500-5,000-pound bins, loaded onto trailer/roll-off boxes, and shipped off site for metal recycling. US Foundries is utilized by the Plant City branch for oil filter recycling. Plant City may subcontract crushing operations to third parties such as Kellen in Mulberry, FL.

#### ***PRETREATED WASTEWATER DISCHARGED TO POTW***

Wastewater is pretreated by FCC prior to discharge to the Plant City POTW for final treatment. Analyses are conducted as required by the Industrial User Effluent Permit. Flow rate, pH, and conductivity are continuously monitored, recorded, and transmitted by telemetry to the POTW. Samples of the pretreated wastewater are collected weekly by the POTW using an ISCO automatic sampler and are tested by the Plant City Wastewater Laboratory for BOD, total suspended solids, total nitrogen, and total phosphorus. Semi-annually, FCC conducts analyses for 12 CWT metals, 5 CWT semi-volatiles, oil & grease, cyanide and mercury.

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**FCC ENVIRONMENTAL, LLC  
PLANT CITY, FLORIDA  
ATTACHMENT 5  
TRACKING PLAN**

FCC maintains records of all materials transported from and received at the FCC facility for a minimum of three years. Incoming materials (used oil, oily water, oily wastes, antifreeze, PCW, and industrial wastewater) are tracked by handheld units through the ERP system “Service order hand held tickets” (completed by driver). ERP is FCC's Enterprise Resource Program (ERP), a computer accounting and resource tracking program.

Shipping documents are in accordance with the requirements specified in 40 CFR 279.56(a). The corresponding information is then entered into the facility's ERP system. Shipping documents will be kept on site and are filed by driver, by month at the facility. On occasion, an independent used oil hauler may deliver materials to the facility. A manifest is generated for each independent hauler and the information is entered into the facilities ERP system. Virgin petroleum products bought for blending are also tracked on the facilities ERP system.

The ERP system generates a “Route Report” daily related to what the driver with their handhelds. An example is included.

Transportation of materials from the FCC facility will be conducted by the FCC fleet (US DOT 1688621). Corporate headquarters are located at 523 N. Sam Houston Pkwy E, Suite 400, Houston, TX, 77060. A shipping document is generated for each outgoing shipment. The shipping documents are in accordance with the requirements specified in 40 CFR 279.56(b).

Tank inventory records are filed daily (see “Physical Inventory” sheet at the end of this attachment). These records are also retained for a three-year period. Analytical results performed by a state-certified laboratory to verify the on-specification claim will be maintained until closure of the facility, in accordance with 40 CFR 279.57. Analyses concerning rebuttal materials (materials that did not meet the waste acceptance procedure requirements) will also be maintained in accordance with 40 CFR 279.57. Reports and records concerning the implementation of the contingency plan will be maintained for the life of the facility.





Service Order ID: 2591243  
Work Date: 06/03/2013  
Vehicle: 961390 - S251 335 335  
Trailer:  
Contact Name: FORD OF CLERMONT,  
Contact Phone: 3523946161  
PO Number:  
Job Complete: YES

Service Location: FORD OF CLERMONT  
1101 E HWY 50

CLERMONT, FL 34711  
EPA ID: FLD053394920

#### NOTES

#### Collected

Description	UM	Quantity	HM
Shipping Description			
BSW	# Containers		Type
Glycol	pH	BRIX	Sniffer
Color	Odor		C-D-T
SERVICE - USED OIL	GA	276	
Non DOT Regulated Used Oil			
		PASS	

#### Parts Cleaners

Service Object	UM Quantity	Serial #	Asset #
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#### Deliveries

Description	UM Quantity	Service Object
-------------	-------------	----------------

#### Payments

Method	Total
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Transporter: FCC ENVIRONMENTAL LLC  
523 SAM HOUSTON PARKWAY EAST SUITE 400  
HOUSTON, TX 77032

US DOT ID: 1688621  
EPA ID: TXR 000078094  
Emergency Contact: CHEMTREC (800) 424-9300

105 S ALEXANDER ST

PLANT CITY, FL 33563-4833

Phone: (813) 754-1504  
EPA ID: FLD065680613

The GENERATOR hereby certifies that the material collected from the GENERATORS facility by FCC Environmental, LLC does not contain any PCBs as defined in 40 CFR 761 and is not hazardous waste or been mixed with a listed or characteristic hazardous waste as defined in 40 CFR 261. If the material collected is a used oil defined in 40 CFR part 279, the GENERATOR certifies that the total halogen content is less than 1,000 ppm, or the GENERATOR hereby certifies that the rebuttable waste presumption under 40 CFR Part 279 has been rebutted. This GENERATOR will be responsible for any and all costs including, but not limited to, proper disposal, testing, and transportation if the material contains PCBs or is determined to be a hazardous waste. I certify that to the best of my knowledge, the information presented herein is correct and accurate, and I am authorized to sign on behalf of the GENERATOR.

I agree to pay for the above services and/or products and to be bound by the terms and conditions set forth in FCC Environmental, LLC Standard Terms of Service Order, which has been previously provided and is available on FCC Environmental, LLC's website [www.fccenvironmental.com](http://www.fccenvironmental.com) or from the driver upon request.

Conditionally Exempt Small Quantity Generator as defined in 40 CFR 261.5

Do-It-Yourself Collection Center

Technician:

*Wallace Andrus*  
*Andrus*

Name: WALLACE ANDRUS  
Date: 06/03/2013 03:10 PM

Customer:

*Mike*

Name: mike  
Date: 06/03/2013 03:10 PM

Printed on Jun 3, 2013 at 3:11 PM

ERP generated service order example



## SPECIAL NOTES

# SERVICE ORDER

NUMBER  
2519260

PAGE OF

CALL TYPE	PROBLEM CODE	ORDER ORIGIN
--------------	-----------------	-----------------

**PRIORITY**  
**Medium**

D. NUMBER

## ASSIGNED TECH

**Organ, Michael Thomas**  
M/A NUMBER PROMISE DATE, TIME

[illegible]

By signing this document, I hereby certify that I understand the used FCC Environmental, LLC degreasing fluid is a Mineral Spirits, petroleum naphthal, returned to FCC Environmental, LLC for inclusion in the FCC Environmental, LLC Reuse Program will be utilized as an effective substitute for chemical product, for the purpose of qualifying to participate in the Program, I further certify that any used degreasing fluid so returned to FCC Environmental, LLC has not been mixed with hazardous waste or other objectionable substances.

All constituents that may be present in the degreasing fluid are contaminants resulting from, and incidental to, normal use of the solvent as a degreaser or cleaner. I have reviewed our physical facilities, administrative practices, and operational procedures and based on this review do willing make this true, accurate and complete certification.

<b>Yes</b>	<b>No</b>	<b>Rep Initials</b>
------------	-----------	---------------------

☐ ☐ Light assembly is in good working order

☐ ☐ Lid is unobstructed

☐ ☐ Parts Cleaner is properly grounded

---

I agree to pay for the above services and/or products and to be bound by the terms and conditions set forth above and on the reverse side of this document.

PRINT CUSTOMER NAME Mr. Fink

CUSTOMER SIGNATURE / DATE

051811

ORIGINAL

DRIVER SIGNATURE / DATE

RECEIVED AT PLANT / DATE

LF-070 Rev B

Initial if Conditionally Exempt Small Quantity Generator

Initial if Do-it-yourself collection center  
as defined in 40 CFR 261.5

Generator  
EPA ID# FLR000059469

The GENERATOR hereby certifies that the material collected from the GENERATOR's facility by FCC Environmental, LLC does not contain any PCBs as defined in 40 CFR 761 and is not hazardous waste or been mixed with a listed or characteristic hazardous waste as defined in 40 CFR 261. If the material collected is a used oil as defined in 40 CFR part 279, the GENERATOR certifies that the total halogen content is less than 1,000 ppm, or the GENERATOR certifies that the recoverable waste presumpingly under 40 CFR Part 279 has been recycled, and all costs for recycling, but not limited to, proper disposal, testing, and transportation, if the material contains PCB's or is determined to be a hazardous waste, I certify that the GENERATOR, to the best of my knowledge, the information presented herein is correct and accurate, and I am authorized to sign on behalf of the GENERATOR.

**Shipping Declaration:**

This is to certify that the above-named materials are properly classified, described, packaged, marked and labeled, and are in proper condition for transportation according to the applicable regulations of the Department of Transportation.

**Transporter Information:**

**ACC Environmental,**

5230N Sam Houston Parkway East, Suite 400 US DOT ID#: 1688621  
Houston, TX 77060 EPA ID#: TXR000078094

EPA ID#: TXR000078094

**Designated Facility**  
5690 W. Midway Road  
Fort Pierce, FL 34981  
(800) 368-0180 Ext 2

EMERGENCY CONTACT/CHEMTREK (800) 424-9300

EB# ID#: F1 00000346304

## Daily Route Report Example

Route	SOBJ Id	SOBJ Name	Recurring Visit	Serv. Date	Day	Calendar Name	Serv. Loc	SOBJ Location Name	SOBJ Street	SOBJ City
356-BXEH	SOBJ-00160200	COL-OF55GADM	CAUSEWAY MOBIL LUBE EXPRESS: COLL - Used Oil Filters/Absorbents	6/2/2013	Sun	EST - Every 4 Weeks (Monthly)	SID-010263	CAUSEWAY MOBIL LUBE EXPRESS	11210 CAUSEWAY BLVD	BRANDON
	SOBJ-00117334	PC COL-SOLVUSED55GADM	TIRES CHOICE 38: SVCS - Parts Cleaner	6/3/2013	Mon	EST - Every 12 Weeks	56198701	TIRES CHOICE 38	10742 BIG BEND RD	RIVERVIEW
356-BXEH	SOBJ-00117335	PC PC-BCASS	TIRES CHOICE 38: SVCS - Parts Cleaner	6/3/2013	Mon	EST - Every 12 Weeks	56198701	TIRES CHOICE 38	10742 BIG BEND RD	RIVERVIEW
356-BXEH	SOBJ-00117336	PC PS-SOLV105GAFPI	TIRES CHOICE 38: SVCS - Parts Cleaner	6/3/2013	Mon	EST - Every 12 Weeks	56198701	TIRES CHOICE 38	10742 BIG BEND RD	RIVERVIEW
356-BXEH	SOBJ-00126435	FIL COL-OF55GADM	BINGHAM ONSITE SEWERS INC: COLL - Used Oil Filters/Absorbents	6/3/2013	Mon	EST - Every 12 Weeks	56423101	BINGHAM ONSITE SEWERS INC	3640 SUMNER RD	DOVER
356-BXEH	SOBJ-00167092	FIL COL-OF55GADM	FOCUS 4 INC: COLL - Used Oil Filters/Absorbents	6/3/2013	Mon	EST - Every 2 Weeks	SID-012989	FOCUS 4 INC	700 RITCHIE RD	DAVENPORT
356-BXEH	SOBJ-00152038	FIL COL-OF55GADM	RING POWER HEAVY EQUIP BLDG: COLL - Used Oil Filters/Absorbents	6/3/2013	Mon	EST - Every 1 Week	SID-006917	RING POWER HEAVY EQUIP BLDG	10421 FERNHILL DR	RIVERVIEW
356-BXEH	SOBJ-00152667	FIL COL-OF55GADM	RING POWER CAT RENTAL BLDG: COLL - Used Oil Filters/Absorbents	6/3/2013	Mon	EST - Every 1 Week	SID-007179	RING POWER CAT RENTAL BLDG	10421 FERNHILL DR	RIVERVIEW
356-BXEH	SOBJ-00152670	FIL COL-OF55GADM	RING POWER TRUCK SHOP BLDG: COLL - Used Oil Filters/Absorbents	6/3/2013	Mon	EST - Every 1 Week	SID-007181	RING POWER TRUCK SHOP BLDG	10421 FERN HILL DR	RIVERVIEW

FCC Environmental LLC

105 South Alexander St.

Plant City, FL 33563

813-754-1504 x3133

## CERTIFIED ANALYSIS

Project ID:	Finished Product	Company Name:	FCC Environmental LLC
Site Address:	Plant City	Company Address:	105 South Alexander Street
Sample Time:	0800	City, State, Zip:	Plant City, FL 33563
Sample Date:	05/13/13	Phone:	813-754-1504
Tank:	552	Report Date:	05/16/13
Matrix:	Oil	Sampled By:	Jason Bowers
Sample Location:	3 Foot line		

Parameter	Method	Results / Initials	Analysis Date	Prep Date	Units	MDL	PQL	Dilution Factor	Regulatory Limit
Viscosity	Visgage	165 AS	05/13/13	05/13/13	SSU@100°F	10	N/A	1	N/A
Flash Point	EPA 1010A	230 AS	05/13/13	05/13/13	°F	30	N/A	1	>100°F
API Gravity	D287	30.7 AS	05/13/13	05/13/13	N/A	0	N/A	1	N/A
Percent Water	D95	0.3 AS	05/13/13	05/13/13	%	0.1	N/A	2	N/A
Percent Ash	D482	0.7697 AS	05/13/13	05/13/13	%	0.01	N/A	1	N/A
Total Halides (TX)	EPA 9075	16 AS	05/13/13	05/13/13	mg/Kg	20	50	1	1000
Percent Sulfur	D4294-03	0.2784 AS	05/13/13	05/13/13	%	0.05	0.05	1	N/A
PCB's Aroclor 1016	EPA 8082	ND *	05/14/13	05/14/13	mg/Kg	2.0	2.0	4	2
PCB's Aroclor 1242	EPA 8082	ND *	05/14/13	05/14/13	mg/Kg	2.0	2.0	4	2
PCB's Aroclor 1254	EPA 8082	ND *	05/14/13	05/14/13	mg/Kg	2.0	2.0	4	2
PCB's Aroclor 1260	EPA 8082	ND *	05/14/13	05/14/13	mg/Kg	2.0	2.0	4	2
Pounds per gallon	CALC	7.264 AS	05/14/13	05/14/13	Lbs/gal	N/A	N/A	N/A	N/A
BTU per gallon	CALC	142,592 AS	05/14/13	05/14/13	BTU/gal	N/A	N/A	N/A	N/A
Arsenic	EPA 6010B	0.19 U*	05/15/13	05/14/13	mg/Kg	0.19	2.0	10	5
Cadmium	EPA 6010B	0.07 U*	05/15/13	05/14/13	mg/Kg	0.07	0.10	10	2
Chromium	EPA 6010B	0.04 U*	05/15/13	05/14/13	mg/Kg	0.04	0.10	10	10
Lead	EPA 6010B	5.28 *	05/15/13	05/14/13	mg/Kg	0.16	0.10	10	100

BTX levels = Below Contracted Maximum

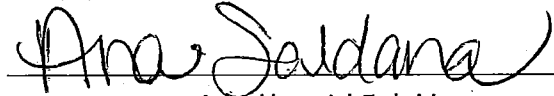
\*Analysis performed by Phoslab Environmental (Lakeland, Florida)

I = Value is between the MDL and the PQL

PQL = Practical Quantitation Limit

ND = Analyte was analyzed for but not detected above reporting limit

U = Under the minimum detection limit



Ana Saldana – Lab Technician



Angelo Pousa – Facility Manager

\*The regulatory limit above reflects the Federal EPA limit for on-specification fuel as defined in 40 CFR 279.11. The on-specification limit for PCB's is imposed by 40 CFR 761.20 (e). These regulatory limits may be less stringent than those required by site-specific permit requirements that may be held by the consumer. Please reference any applicable permits prior to acceptance of this material to ensure compliance.

# TYPICAL DAILEY INVENTORY SHEET

Date: 5-23-13

Day: THU

Plant City

Total Inventory:

1 MSMT: 10-0  
GALS:   
PROD: Antifreeze

2 MSMT: 17-0  
GALS:   
PROD: oil

3 MSMT: 18-0  
GALS:   
PROD: oil

4 MSMT: mt  
GALS:   
PROD:

5 MSMT: mt  
GALS:   
PROD:

6 MSMT: 29-0  
GALS:   
PROD:

24 MSMT:   
GALS:   
PROD:

20V MSMT: 12-0  
GALS:   
PROD: Antifreeze

7 MSMT: 11-0  
GALS:   
PROD: oil

8 MSMT: mt  
GALS:   
PROD:

9 MSMT: mt  
GALS:   
PROD:

10 MSMT: mt  
GALS:   
PROD:

11 MSMT: mt  
GALS:   
PROD:

12 MSMT: 15-0  
GALS:   
PROD: 552

552 MSMT: 4-0  
GALS:   
PROD: Finished Oil

10K MSMT: 1-0  
GALS:   
PROD: DIESEL

20,000 MSMT: 16-0  
GALS:   
PROD: RAIN

20KV MSMT: 19-7 1/2  
GALS:   
PROD: Refinery Fuel

30KV MSMT: mt  
GALS:   
PROD: Finished Oil

630 MSMT: 41-2  
GALS:   
PROD: Feed Oil

C-1 MSMT: 9-11  
GALS:   
PROD: oil

C-2 MSMT: 21-0  
GALS:   
PROD: oil

C-3 MSMT: mt  
GALS:   
PROD:

CONE MSMT: 5-0  
GALS:   
PROD: High Cond

Trailer #

Trailer #

Trailer #

Trailer #

Trailer #

Trailer #

Trailer #

Railcar # 10C FX 78365

98' C-3

Railcar #

Railcar #

Railcar #

Railcar #

Railcar #

Railcar #

Railcar #

Railcar #

Railcar #

Railcar #

Street Truck #

Street Truck #

Street Truck #



---

**FCC ENVIRONMENTAL, LLC  
PLANT CITY, FLORIDA  
ATTACHMENT 6  
PREPAREDNESS AND PREVENTION CONTINGENCY PLAN**

The purpose of the contingency plan is to minimize hazards to human health or the environment from fires, explosions, or any unplanned sudden or non-sudden releases of hazardous wastes or hazardous material and constituents to the air, soil, or surface waters. The Preparedness and Prevention Contingency (PPC) Plan is a combination of the facility Spill Prevention, Control and Countermeasures (SPCC) Program and the Emergency Action Plan (EAP), as permitted under 40 CFR 279.52 (b)(2)(ii)). Requirements pertaining to the PPC Plan are being addressed by including both the SPCC and EAP Plans as tabbed sections at the end of this permit application.

The Plan must be implemented immediately whenever there is a fire, explosion, or unplanned release of hazardous material that could threaten human health or the environment. The original document is located in the main office, and copies are located in the Branch Manager's office. Plan copies will be distributed to the local sheriff's office, fire department, and hospitals upon approval from the FDEP.

During an emergency situation, the Branch Manager must be notified immediately. The individuals designated as Emergency Contacts, including the Branch Manager, and their contact information are listed in the SPCC Plan and in this attachment. The primary Emergency Operations Center (EOC) or Command Post is located in the main operations building conference room. The laboratory is designated as the alternate EOC.

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

***PREPAREDNESS AND ARRANGEMENTS WITH LOCAL  
AUTHORITIES***

***Emergency Equipment***

---

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





The Branch Manager will test the alarm system the first week of every month. During a power outage, the alarm system will utilize its back-up power system, or communications can be maintained by direct connect cellular phones. Many personnel have direct connect cellular phones that can be used if the facility phone system is not operational.

All emergency equipment in all plants, such as fire monitors, emergency eyewash/showers, is inspected and flushed monthly. Equipment that operates on independent power is properly charged prior to storage. A record of the emergency alert test and emergency equipment inspections is maintained in the Plant Operations Book.

Fire extinguishers, eyewash stations, showers, and spill kits are strategically located throughout the facility. Locations have been determined by area usage and the potential for harm. Fire extinguishers are checked and tagged in accordance with fire safety practices. The Branch Manager is responsible for monthly inspection and maintenance of fire protection equipment. Annual inspections of the fire extinguishers are performed by an outside contractor.

Secondary containment is also provided to contain released materials. This sealant on the secondary containment was chosen based on its resistance to not only petroleum products but also caustic materials where there is exposure risk.

A facility map that shows the location of emergency equipment, spill containment equipment, and emergency communication equipment, as well as traffic flow, is included in Exhibit II of the Emergency Action Plan.

### ***Fire Response***

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Should personnel discover a fire or smell smoke, they would contact 911 immediately and follow the procedures outlined in the EAP. The responding fire station has toured FCC's facility and is acquainted with the facility operations and layout. The fire station has a key and code access to FCC's facility. Inventory records are kept in a designated box located outside the gate in case of an emergency after hours. In the event of a fire, the EAP contains in Section 4.1 detailed measures to be undertaken by facility personnel.

### ***Evacuation***

---

All personnel, including visitors and contractors, must leave the building through the proper exit. All tank farm personnel will evacuate east and proceed north past the operations building. Personnel located in the water treatment area will evacuate east past the quality assurance lab. Personnel working in the drum processing or loading/unloading areas will evacuate to the east and then north past the operations building. All personnel will assemble across the street from the parking area located on Alexander St. An evacuation route diagram is provided in Exhibit 1 of the Emergency



Action Plan (EAP). The appropriate supervisors will take a headcount and report this information to the appropriate managers, who will in turn report to the Branch Manager. All personnel shall remain outside until directed to return by the manager.

### ***RECORD KEEPING AND REPORTING***

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

#### **Florida Department of Environmental Protection**

##### Physical Address:

Southwest District Office  
13051 N. Telecom Parkway  
Temple Terrace, FL 33637-0926

Phone: (813) 632-7600

Fax: (813) 632-7664

##### Mailing Address:

13051 N. Telecom Parkway  
Temple Terrace, FL 33637-0926

#### **State & Local Agencies**

FDEP – Tallahassee (normal business hours)

Phone: (850) 245-2118

National Response Center

Phone: (800) 424-8802

State Warning Point (24 hour- spill contact)  
(Emergency Management, State of Florida)

Phone: (850) 413-9969

EPA Emergency Response (Atlanta)

Phone: (404) 562-8520

## **Local Agencies**

Hillsborough County EPC	Phone: (813) 627-2600
Plant City Pretreatment Coordinator (bus hours) 240	Phone: (813) 757-9289 x.
Plant City POTW (after hours)	Phone: (813) 757-9288

## **Local Emergency Services**

Plant City Fire Rescue	Phone: 911
Plant City Fire Rescue (non-emergency)	Phone: (813) 757-9131
Plant City Police Department	Phone: 911
Plant City Police Department (non-emergency)	Phone: (813) 757-9200

The report will include the following information:

- a) Name, address, and telephone number of the Branch Manager
- b) Name, address, and telephone number of the facility
- c) Date, time, and type of incident
- d) Name, type and quantity of materials involved
- e) Any injuries that may have occurred
- f) An assessment of the actual or potential harm to human health and the environment
- g) Estimated quantity and disposition of any materials recovered

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

## **EMERGENCY CONTACTS**

### **FCC Environmental, LLC**

#### **PLANT CITY PLANT**

1. Angelo Pousa, Area Manager  
Work: 813-754-1504 ext.3117                      Mobile: 954-868-1376
2. Mike Bisson, Transportation Manager  
Work: 813-754-1504 ext. 3126                      Mobile: 813-478-5342
3. Scott Crandall, EHS Director  
Mobile: 813-335-5341

**SPILL PREVENTION, CONTROL, AND  
COUNTERMEASURE PLAN**

**PLANT CITY FACILITY**

**FCC ENVIRONMENTAL, LLC  
PLANT CITY, FLORIDA**

FCC Environmental, LLC  
May 2013

---

**Spill Prevention, Control, and Countermeasure Plan  
Plant City Facility**

**FCC Environmental, LLC  
(Formerly Hydrocarbon Recovery Services, Inc.)  
Plant City, Florida  
Prepared by**



ENSR International Project No.: 06953-024-500

Blair D. Burgess, Jr., P.E.  
Senior Engineer

Sultan Anjum  
Project Manager

Amended and Certified by  
Carol Beth Kessler, P.E.  
Senior Engineer  
USFilter Recovery Services  
June 2005

Amended and Certified by  
Carol Beth Jones, P.E.  
Senior Engineer  
Hydrocarbon Recovery Services, Inc.  
February 2008

Five Year Review  
Jack Thornburgh  
Branch Manager  
Hydrocarbon Recovery Services, Inc.  
July 2008

Five Year Review  
Vinnie Glorioso  
Environmental Health and Safety Manager  
FCC Environmental, LLC  
May 2013



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**SPILL REPORTING PROCEDURES**  
**FCC Environmental, LLC**  
**PLANT CITY FACILITY**  
**PLANT CITY, FLORIDA**

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

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

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

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

**911, or (813) 757-9131**

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

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

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

And one of the following State Reporting Divisions

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

**FDEP-Tampa Office (8AM to 5 PM)**.....1 - 813-632-7600

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

**Local Emergency: 911**

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

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## **SPILL RESPONSE PROCEDURES**

### **FCC Environmental, LLC PLANT CITY FACILITY PLANT CITY, FLORIDA**

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

1. notify the Emergency Coordinator or alternate;
2. take whatever steps are necessary to stop the release (in accordance with OSHA health and safety requirements)
3. contain the spill onsite (utilize onsite spill kits and absorbent materials);
4. assess site conditions including the potential for the release to extend beyond the property boundary and report to the Emergency Coordinator your observations;
5. clean up (utilize onsite equipment to recover liquids and excavate shallow impacted soils/gravel) and manage properly the recovered materials including oil and affected media; and
6. if necessary, repair or replace any leaking oil storage containers or tanks prior to returning them to service.

---

## **EMERGENCY CONTACTS**

### **FCC Environmental, LLC PLANT CITY FACILITY PLANT CITY, FLORIDA**

1. Angelo Pousa, Area Manager and primary emergency coordinator  
Work: 813-754-1504 x 3117      Mobile: 954-868-1376
2. Mike Bisson, Transportation Manager and alternate emergency coordinator  
Work: 813-754-1504 x 3126      Mobile: 813-478-5342
3. Scott Crandall, EH&S Director  
Mobile: 813-335-5341
4. John Goelz, Field Service Regional Manager  
Work: 407-854-1620      Mobile: 407-466-4085
5. Oil Spill Response Contractor  
Southern Waste Services (SWS) Environmental First Response  
Emergency Contact Number 800-852-8878

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Release Reporting Form	B
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SPCC Plan Review and Amendment Log	D
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## INTRODUCTION

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

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

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

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

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

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

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

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

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

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



engineering design and operations, procedures and practices in place at the site to prevent and/or contain a potential spill.

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

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

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

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

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

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

U.S. EPA	FDEP	– Southwest District
Regional Administrator		Emergency Response Unit
U.S. EPA – Region IV	and	13051 North Telecom Parkway
61 Forsyth Street		Temple Terrace, Florida 33637-0926
Atlanta, Georgia, 30303		

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

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

## **GENERAL INFORMATION**

Facility Name: FCC Environmental, LLC  
Plant City Facility

Street Address: 105 South Alexander Street  
Plant City, Florida, 33563

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

### **2.1 Facility Description**

The FCC Environmental, LLC (FCC) Plant City Facility is a used oil, and oily water processing plant. This facility also processes wastes from other FCC plant facilities. Typical facility operating hours are from 7:00 AM to 6:00 PM, Monday through Friday. The Plant City facility consists of an office building, laboratory, maintenance shop, locker room, and storage/drum processing operation. The facility is located in Plant City, Hillsborough County, Florida, in a commercial/light industrial area. This facility has been under US Filter operation from July 24, 2002 until August 31, 2006 when USFilter Recovery Services (Mid-Atlantic) Inc. merged into its immediate parent company, Siemens Water Technologies Corp. On October 1, 2007 a legal reorganization created

the legal entity, Hydrocarbon Recovery Services, Inc. On July 1, 2010, the company changed legal names to FCC.

The site is bounded on the north by CSX Railroad line. Alexander Street abuts the eastern perimeter of the facility. Light industrial facilities are present north of the CSX Railroad and east of Alexander Street. Americold Storage and vacant land abuts the southern boundary of the site. Vacant land abuts the western perimeter of the site. A site plan and drainage map is presented as Figure 2.

Used oil and oily water mixtures are transported to the facility by trucks of varying sizes (1800 gallons – 10,000 gallons). Regulated materials may be stored in 25 Aboveground Storage Tanks (ASTs). Used oil and oily filters are processed, and any resulting waters are treated on site by a centralized wastewater treatment plant. Used oil filters and other oily wastes such as petroleum contaminated solids are stored and processed at the facility. Recovered oil is processed to specification and shipped out to customers. The generated wastewater is discharged to the City of Plant City POTW. Recovered solids are disposed offsite for further treatment.

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

## **2.2 Fixed Storage**

The collected hydrocarbon fluids may be stored in up to 25 ASTs, including 2 that are non-regulated under Florida Administrative Code 62-762.301. Oily water is stored in three ASTs (Tanks SKE, SKW, and D5K). Diesel is stored in a 10,000-gallon AST (Tank 10K). Used oil is stored in Tank 630, C-1, C-2, C-3, and Tanks #2, 3, 4, 5, 6, 7, 8, 9, 10, 11, 12, 24K, 20KV and 30KV. Spec fuel (No. 5 oil) is stored in Tank 552. Used Antifreeze is stored in a 20,000-gallon AST (Tank 20V) and a 14,700-gallon AST (Tank 1). Used oil filters are stored in 55-gallon drums. The ASTs and their associated piping are constructed of single-wall steel, with the exception of Tank 630, which is of double-wall steel construction. Except for Tank 630, the tanks are located in concrete, secondary containment structures. (Note: AST 10V and 82V contain non-regulated waters, but are included in containment calculations.)

The location of these tanks is shown in Figure 2; the volume and contents of each tank is listed in Table 1. Due to oil storage capacity exceeding one million gallons and its proximity to waters of the United States, the facility meets the substantial harm criteria as defined by 40 CFR 112 and is subject to the requirements of a Facility Response Plan (40 CFR 112.20). Certification is provided in Attachment A.

The materials and construction of all tanks used for the storage of petroleum are compatible with the materials stored and conditions of storage. Overfill protection is provided by fail-safe engineering controls. An outside level-gauge is provided for Tanks 1 through 12, 20V, T-83, T-630, 552, 10K, 20KV, 30KV, D5K, SKE, and SKW. Tanks C-1, C-2 and C-3 are equipped with high level alarms in addition to level gauges. The facility is manned daily and the facility will be observed by facility employees. Abnormal conditions are noted and appropriate measures taken.

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

A tertiary containment area is constructed to collect and treat stormwater runoff from buildings and parking lot areas, and noncontact stormwater from storage tanks and oil loading areas by means of settling tank/ oil separation system with effluent water flowing to a grassed area and design for a flow of 0.1–25 million gallons per day (MGD). The facility is designed to contain process water and a rainfall event from a 24 hour–25 year storm.

Total Regulated Substance Stored:

552,000-gallon Refined oil/On-Specification oil  
1,067,300-gallon Used oil/oily water  
10,000-gallon Vehicular Diesel  
34,700-gallon Used Antifreeze  
1,664,000-gallons Total

Total Regulated Tank Volume:

One 552,000-gallon Refined/On-Specification Oil AST (Note: holds 500,000-gallon of product)  
Three 14,700-gallon Used Oil ASTs  
Two 14,100-gallon Used Oil ASTs  
Three 15,000-gallon Used Oil ASTs  
Two 18,800-gallon Used Oil ASTs  
One 20,000-gallon Used Oil AST  
Two 24,000-gallon Used Oil ASTs  
One 30,000-gallon Used Oil AST  
Three 30,000-gallon Used Oil ASTs  
One 630,000-gallon Used Oil AST  
One 5,000-gallon Oily Water AST  
Two 44,700-gallon Oily Water ASTs (Note: non-regulated in Florida, exempt under F.A.C. 62-762.301)  
One 10,000-gallon Diesel AST  
One 20,000-gallon Used Antifreeze  
One 14,700-gallon Used Antifreeze

Tank Construction:

All the ASTs are constructed of steel meeting the standards of the American Petroleum Institute (API). With the exception of Tank T-630 which is of double wall construction, all the ASTs are single walled.

### Containment:

#### South Tank Farms (14 ASTs)

Approximately 42.33 feet x 15.33 feet x 3.33 feet = 2,160.89 cu. ft. x 7.48 g/cu.ft.  
v= 16,164 gallons

Approximately 98.67 feet x 28.67 feet x 3.33 feet = 9,420.13 cu. ft. x 7.48 g/cu.ft.  
v= 70,463 gallons

Total Volume = 16,164 + 70,463 = 86,627-gallons

Total Tank Volume Displaced = 25,833-gallons

Total AST Secondary Containment = 86,627 – 25,833 = 60,794-gallons

Net Capacity ~ 60,794 gallons vs. 24,000-gallon maximum capacity

#### West Tank Farm (10 ASTs)

Approximately 83.92 feet x 43.66 feet x 2.81 feet = 10,298 cu. ft. x 7.48 g/cu.ft.  
v= 77,029 gallons

Approximately 83.66 feet x 35 feet x 3.17 feet = 9,282 cu. ft. x 7.48 g/cu.ft.  
v= 69,430 gallons

Approximately 0.5 x 137.66 feet x 18.66 feet x 3.17 feet = 4,071.44 cu. ft. x 7.48 g/cu.ft.  
v= 30,454.42 gallons

Total Volume = 77,029 + 69,430 + 30,454.42 = 176,913-gallons

Total Tank Volume Displaced = 60,221-gallons (including Tank 552 displacement)

Total Tank Volume Displaced = 13,712-gallons (not including Tank 552 displacement)

Total AST Secondary Containment = 176,913 – 60,221 = 116,692-gallons

Total AST Secondary Containment for 552 failure = 176,913 – 13,712 = 163,201-gallons

Net Capacity ~ 116,692-gallons vs. for a maximum spill of 30,000-gallons from the second largest AST.

Note: Tank Number 552 is the largest tank in the west tank farm area and holds approximately 500,000-gallons of ASTM Grade 5 Residual Fuel Oil . West Tank farm area has a net secondary containment volume of 179,022-gallons, which is not sufficient to contain the volume of Tank Number 552. Tank Number 552 stores ASTM Grade 5 Residual Fuel Oil, therefore it is exempted from the State of Florida secondary containment requirements in accordance with 62-762, FAC. The Florida Administrative Code (FAC), 62-762.201.34, and 62-762.501.(2)(c)1(g) acknowledges that due to physical characteristics, some oils pose less risk of impacting nearby water bodies. In this case, Grade 5 Fuel Oil has a viscosity of over 30 Centistokes and is exempted from Florida secondary containment and release detection requirements.

In addition to the physical limitations of Grade 5 Residual Fuel Oil, FCC has a very strong contingency plan for responding to catastrophic releases. In the event of a catastrophic release from Tank 552, FCC has sufficient internal resources to prevent the release from entering the nearest waterbody located approximately 400 feet southwest from the site. FCC's internal resources include but are not limited to several Vacuum and Tanker Trucks, Mechanical Pumps, and large quantity of absorbent pads. Additionally, FCC has a contract with SWS Environmental for emergency response services required at the site.

Due to the physical properties of Grade 5 Fuel oil, the onsite stormwater treatment system and FCC's contingency plan for addressing a catastrophic release, it is the engineer's opinion that in accordance with 40 CFR 112.7 (c) and (d), secondary containment for Tank Number 552 is not warranted.

#### Containment (continued):

##### Refinery Area (3 ASTs)

Approximately 129.25 feet x 41.08 feet x  $0.5 + 0.75/2$  feet = 3,318.50 cu. ft. x 7.48 g/cu.ft.  
v= 24,823 gallons

Approximately 129.25 feet x 26.42 feet x  $0.58 + 0.75/2$  feet = 2,270.8 cu. ft. x 7.48 g/cu.ft.  
v= 16,986 gallons

Approximately 67 x 24.50 feet x  $0.50 + 0.58/2$  feet = 886.41 cu. ft. x 7.48 g/cu.ft.  
v= 6,631 gallons

Approximately 10 feet x 10 feet x  $0.50 + 0.53/2$  feet = 51.5 cu. ft. x 7.48 g/cu.ft.  
v= 386 gallons

Containment Volume of Holding Tank = 2,424-gallons

Containment Volume of Collection Grate = 34-gallons

Containment Volume of Separator = 72-gallons

Containment Volume of 8" diameter U pipe = 248-gallons

Total Volume = 24,823 + 16,986 + 6,631 + 386 + 2,424 + 34 + 72 + 248 = 51,604-gallons

Total Tank Volume Displaced = 1,294-gallons

Total AST Secondary Containment = 51,604 – 1,294 = 50,310-gallons

Net Capacity ~ 50,310-gallons vs. 44,650-gallon maximum capacity.

Note: Only one tank displacement has been used for calculation due to the impossibility of a total evacuation of a tank. Settling within the tank is expected to occur.



Containment (continued):

Tank T-630 AST

Containment Volume =  $(22/7)/4 \times 64 \text{ feet-dia.} \times 64 \text{ feet-dia.} \times 29 \text{ feet} = 93,292.74 \text{ cu. ft.} \times 7.48 \text{ g/cu.ft.} = 697,830 \text{ gallons}$

Total Volume = 697,830-gallons

Total Tank Volume Displaced = 496,795-gallons

Volume Available if Tank T-630 spills = 697,830-gallons

Volume Needed if Tank T-630 spills = 693,000-gallons

Surplus or Excess Volume =  $697,830 - 693,000 = 4,830\text{-gallons}$

Note: Tank T-630 is a double-walled AST.

Vehicles:

8 Tanker Trailers

6 Tanker Trucks

5 Office Vehicles

4 Vacuum Trucks

5 Box Trucks

6 Tractors

4 Storage Trailers

3 Trucks

1 Flatbed Combo Truck

## **2.3 Portable Storage**

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

**Table 1 – South Tank Farm**  
**Summary of Aboveground Storage Tank Characteristics**  
**FCC Environmental, LLC – Plant City Facility**  
**Plant City, Florida**

Tank ID Number	Volume (Gallons)	Material Stored	Displacement (Gallons)
1	14,700	Antifreeze	1956
2	14,700	Used Oil	1956
3	15,000	Used Oil	1956
4	15,000	Used Oil	1956
5	15,000	Used Oil	1956
6	18,800	Used Oil	1956
7	14,100	Used Oil	1956
8	14,100	Used Oil	1956
9	14,700	Used Oil	1956
10	14,700	Used Oil	1956
11	18,800	Used Oil	1956
12	24,000	Used Oil	2157
20V	20,700	Antifreeze	2157
24K	24,000	Used Oil	0

**Table 1 (Continued)– West Tank Farm**  
**Summary of Aboveground Storage Tank Characteristics**  
**FCC Environmental, LLC – Plant City Facility**  
**Plant City, Florida**

Tank ID Number	Volume (Gallons)	Material Stored	Displacement (Gallons)
552	500,000	Number 5 Oil	46,509
20KV	20,000	Used Oil	2,679
C-1	30,000	Used Oil	668
C-2	30,000	Used Oil	668
C-3	30,000	Used Oil	668
30KV	30,000	Used Oil	2,679
10K	10,000	Vehicular Diesel	2,051
D5K	5,000	Oily Water	1,191
10V	10,000	Non-Regulated Water	2,051
82V	8,200	Non-Regulated Water	1,057

Note: Tank 552 is exempted from 62-762 F.A.C. as the contents are Grade 5 Residual Fuel Oil.

**Table 1 (Continued)– Refinery Area  
Summary of Aboveground Storage Tank Characteristics  
FCC Environmental, LLC – Plant City Facility  
Plant City, Florida**

Tank ID Number	Volume (Gallons)	Material Stored	Displacement (Gallons)
SK-W	44,650	Oily Water	1,175
SK-E	44,650	Oily Water	1,175
TANK NOT IN USE	2,900	Empty	238

**Table 1 (Continued)– Tank T-630  
Summary of Aboveground Storage Tank Characteristics  
FCC Environmental, LLC – Plant City Facility  
Plant City, Florida**

Tank ID Number	Volume (Gallons)	Material Stored	Displacement (Gallons)
T-630	630,000	Used Oil	496,795

### **SPILL HISTORY (40 CFR 112.7[A])**

All spills occurring within the containment are documented in the facility operations log. All spills occurring outside the containment are documented in a separate spill log including a written description of each spill, corrective action taken, and plans for preventing recurrence as required by 40 CFR 112.7(a). Due to a break-in in November 2007, roughly 4000 gallons of used oil was released onto asphalt. The incident was reported to the local police department, as well as local and state agencies. The spill was cleaned and corrective actions were identified. Those corrective actions were to install more lighting and research the effectiveness and applicability of a video surveillance system. (NOTE: On 9/24/99, the previous owners of the facility had a reportable spill of more than 1,000 gallons.)

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

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

**Table 2**  
**Potential Spill Volumes and Rates**  
**FCC Environmental, LLC – Plant City Facility**  
**Plant City, Florida**

Potential Type of Failure	Quantity	Rate	Direction of Flow
Complete failure of full tank	up to 630,000 gallons	Instantaneous	Contained by secondary containment
Partial failure of full tank	> 1 to 630,000 gallons	Gradual to Instantaneous	Contained by secondary containment
Tank Overfill	> 1 to 10,000 gallon (truck transport)	Up to 5 gallons per minute	Contained by secondary containment
Leaking pipe or valve packing	Up to 630,000 gallons	Up to 5 gallons per minute	Contained by secondary containment
Tank Truck leak or failure, Frac Tank leak or failure	Up to 10000 gallons	Gradual to Instantaneous	Spill Collection Containers
Hose leaking during truck loading/unloading (Tank Battery A)	Up to several gallons	Up to 5 gallons per minute	Spill Collection Containers
Hose leaking during truck loading/unloading (Tank Battery E)	1 to several gallons	Up to 5 gallons per minute	Secondary containment on concrete spill ramp.
Pump rupture or failure	Up to several gallons	Up to 300 gallons per minute	Contained by secondary containment

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

Concrete dikes are provided around the ASTs (except tank 630 is contained by steel). All concrete and steel secondary containment systems are sufficiently sized to hold the entire volume of the largest tank (630,000-gallons) with proper allowances for precipitation. The system serves to confine any spill inside the facility tank operation areas. The loading and unloading areas for tank trucks are also curbed and engineered to control typical spills. As needed, spilled liquids may be pumped in the treatment systems by vacuum trucks.

ASTs in the refinery area meet the secondary containment requirements for freeboard in the case of a release during precipitation events. Any overflow from the secondary containment in the refinery area is directed towards the settling tank/oil water separator system acting as a tertiary containment. The effluent from the settling tank/oil water separator system is directed to a grassed retention area. The facility is designed to contain process water and a rainfall event from a 24 hour-25 year storm.

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

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

FCC has spill response equipment and personnel stationed at the Plant City Facility, that can respond to the spill immediately. The on-duty dispatcher will immediately contact the Emergency Coordinator and local operations personnel to contain the spill. Additional equipment can be summoned from other facilities or from local emergency response contractors, as needed.

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

Spill notification procedures are outlined at the beginning of this Plan. The City of Plant City Fire Department will also be notified of any major spill that occurs at the Plant City Facility.

The City of Plant City Fire Department is familiar with the facility layout in the event of a major spill or fire.

### **DEMONSTRATION OF PRACTICABILITY (40 CFR 112.7[D])**

Facility management has determined that the use of containment and diversionary structures or readily available equipment to prevent discharged oil from reaching navigable waters is practical and effective at this facility for the fixed storage. Secondary containment is provided for all storage tanks with the exception of Tank Number 552. Discharged oil from Tank Number 552 will be prevented from reaching Navigable waters using the available secondary containment capacity, readily available equipment and response actions by facility personnel. ASTs in the refinery area meet the secondary containment requirements for freeboard to contain a release during a precipitation event. Any overflow from the secondary containment in the refinery area is directed towards the settling tank/oil water separator system acting as tertiary containment. The effluent from the settling tank/oil water separator system is directed to a grassed retention area. The facility is designed to contain process water and a rainfall event from a 24 hour-25 year storm. Equipment and supplies available to address facility spills is presented in Section XIII.

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

### **FACILITY DRAINAGE (40 CFR 112.8[B])**

Stormwater runoff from outside the containment around the storage tanks will gravity flow to the settling tank / oil-water separator. Stormwater from within the containment areas is inspected for sheen, and then discharged through valves which otherwise remain closed. The stormwater runoff from the truck loading/unloading areas also gravity flows to the oil-water separator.

There are two sump areas outside the containment areas to retain and/or return any spilled oil to the facility. Spills that occur outside the containment will be cleaned up with on-site vacuum units assigned to the Plant City facility. In addition, sorbent materials, and shovels are on the site, if needed (40 CFR 112.7(c)). Spill Response Procedures are presented in Page i of this document.

If a worst-case discharge were to occur, it is predicted that much, if not all of the oil would be contained within the containment areas. What occurs outside of the containment or for areas where containment may be insufficient, the oil would be contained by the stormwater treatment system or in onsite retention areas.

When discovered, oil discharges are promptly collected, contained, and/or pumped into on-site tanks. A log will be kept at the facility documenting spills that occur outside the secondary containment area and clean up procedures that are implemented.

### **BULK STORAGE TANKS (40 CFR 112.8[C])**

Each aboveground storage tank is of steel construction and is compatible with the oils they contain and conditions of storage. With the exception of Tank 24K, there are no internal heating coils present in the tanks at the Plant City Facility. Tanks C1, C2 and C3 are equipped with high level alarms and a level gauge. Tanks 1 through 12, 20V, T-83, T-630, 552, 10K, 20KV, 30KV, D5K, SKE, and SKW are also equipped with level gauges. By policy and practice, operations measures tank usage (inventory) routinely. Venting capacity is suitable for the fill and withdrawal rates.

All aboveground tanks are surrounded by a concrete containment system (except tank 630 secondary containment is constructed of steel) that provides secondary containment. The South



Tank Farm has secondary containment with a volume greater than 110 percent of the largest single tank and freeboard to accommodate precipitation events. The West Tank Farm has secondary containment sufficient to contain greater than 110% of any single tank except for T-552 which contains highly viscous fuel oil number 5 (refer to Section 6, Practicability), plus sufficient freeboard to accommodate precipitation events. The Refinery tank area has secondary containment sufficient to contain greater than 110% of the largest single tank and sufficient freeboard to accommodate precipitation event. Any overflow from the secondary containment area is directed towards the oil/water separator system (which serves as tertiary containment). The facility is designed to contain process water and a rainfall event from a 24-hour 25-year storm. Contact storm water is not released to open waterways. It is managed as an industrial oil/water or fuel/water mixture and pumped to the appropriate tank. There are no underground or partially buried storage tanks at the Plant City Facility.

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

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

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

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

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

All pipe supports are designed to minimize abrasion and corrosion and to allow for expansion and contraction. No buried piping is utilized at the Plant City Facility.

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

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

1. Prior to commencement of loading or unloading from a tank truck/railcar:
  - a. By the way of a physical barrier system (**per 112.7(e)(4)(iii)**), the cargo tank wheels shall be securely chocked to prevent vehicular departures before complete disconnect of lines; and,
  - b. If the vehicle cab remains attached, the vehicle handbrake shall be securely set.
2. A cargo tank must be attended at all times during the loading or unloading transfer process. The attendee shall be a contractor or FCC employee familiar with tank truck/railcar loading and unloading procedures.
3. For transfer to bulk storage tanks not having high liquid level alarms, high liquid level pump cutoff devices, or a fast response system (i.e. digital computers, telepulse, or direct vision gauges) for determining liquid levels, direct audible or code signal communications must be used between the tank gauges and the tank truck personnel during each bulk transfer operation.
4. During the loading or unloading transfer process, the cargo tank attendee must:
  - a. Be alert;
  - b. Have an unobstructed view of the cargo tank;
  - c. Be within 25 feet of the cargo tank; and
  - d. Be familiar with procedures to be followed in an emergency.
5. Upon completion of the loading or unloading transfer process, the tank truck/railcar attendee shall ensure that:
  - a. All manhole closures on the truck/railcar are closed and secured; and
  - b. All valves and other closures in liquid discharge systems are closed and free of leaks.
6. Prior to departure of any tank truck/railcar, the lowest drain and all outlets of such vehicle shall be closely examined for leakage; and, if necessary, tightened, adjusted, or replaced to prevent liquid spillage while in transit.

## **INSPECTION AND RECORDS (40 CFR 112.7[E])**

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

In addition to the monthly facility inspections, undocumented daily visual inspections are conducted. These inspections consist of a complete walk through of the facility property to check for tank damage or leakage, stained or discolored soils, and excessive accumulation of water in containment areas.

### **SECURITY (40 CFR 112.7[G])**

The facility is secured by steel chain-link fencing wall on all sides. Entrance gates are locked when the facility is unattended.

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

Loading and unloading connections of oil pipelines are capped when not in service or when in standby service for an extended period of time. Area lighting is located to illuminate the office and storage areas. Consideration was given to providing the ability to discover spills at night and prevent spills occurring through vandalism. At the facility, visitors check in with the on-duty dispatcher and are required to sign in and review general safety guidelines, as well as emergency and spill control procedures.

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

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

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

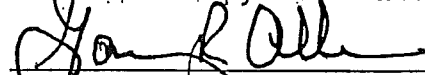
Spill prevention equipment maintained onsite include four vacuum trucks, six tanker trucks, eight tanker trailers, and one hundred 55-gallon waste containers. The facility maintains a spill cabinet inventory of 120 feet of absorbent boom, 600 – 18" x 18" absorbent pads, 600 lbs. of dry absorbent, five sets of Tyvek suits, rubber gloves, protective boots, and eye protection, and miscellaneous shovels, squeegees and brooms. The spill cabinet inventory is inspected weekly

and restocked as needed. Additional quantities of absorbent boom and absorbent pads are kept in bulk storage onsite.

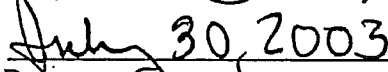
#### 14.0 MANAGEMENT APPROVAL AND ENGINEER'S CERTIFICATION (40 CFR 112.3[D])

##### Management Approval

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



Gary R. Allen, Facility Manager



Date

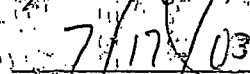
##### Engineering Certification

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

My agent, Sultan Anjum, performed an onsite SPCC inspection, and reviewed pertinent documents and information provided by U.S Filter Recovery Services for the purpose of verifying that proper management for oil use, storage, handling, and disposal are implemented at this site.



Blair D. Burgess, Jr. P.E.



Date

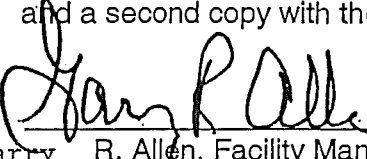
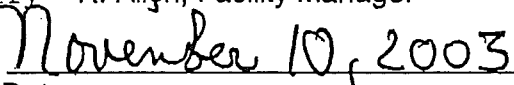
EMBOSSED METALLIC

Registration Number: 45460, State: Florida

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

### Management Approval


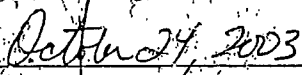
I hereby certify that the information provided in this document is to the best of my knowledge true and accurate. The SPCC Plan is fully approved by the management of USFRS-MA and will be implemented as described (40 CFR 112.7). A copy of this plan will be maintained at the facility and a second copy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

  
\_\_\_\_\_  
Garry R. Allen, Facility Manager  
  
\_\_\_\_\_  
Date

### Engineering Certification

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My agent, Sultan Anjum, performed an onsite SPCC inspection, and reviewed pertinent documents and information provided by U.S Filter Recovery Services for the purpose of verifying that proper management for oil use, storage, handling, and disposal are implemented at this site.

  
\_\_\_\_\_  
Blair D. Burgess, Jr. P.E.  
  
\_\_\_\_\_  
Date

EMBOSSSED METALLIC

Registration Number: 45460, State: Florida

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

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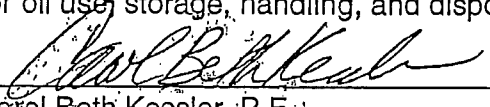
  
\_\_\_\_\_  
Gary R. Allen, Facility Manager

  
\_\_\_\_\_  
Date

### Engineering Certification

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

I performed an onsite SPCC inspection, and reviewed pertinent documents and information provided by U.S. Filter Recovery Services for the purpose of verifying that proper management for oil use, storage, handling, and disposal are implemented at this site.

  
\_\_\_\_\_  
Carol Beth Kessler, P.E.

  
\_\_\_\_\_  
Date

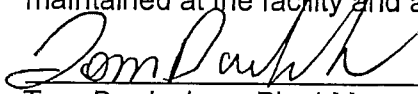
Registration Number: 60598, State: Florida

---

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

### Management Approval

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



Tom Burdeshaw, Plant Manager

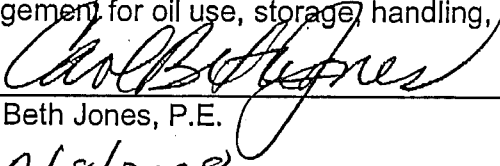
02/11/08

Date

### Engineering Certification

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I performed an onsite SPCC inspection, and reviewed pertinent documents and information provided by Hydrocarbon Recovery Services, Inc. for the purpose of verifying that proper management for oil use, storage, handling, and disposal are implemented at this site.

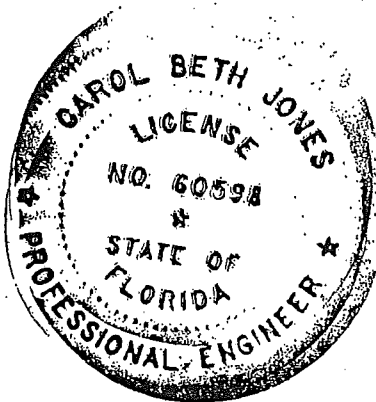


Carol Beth Jones, P.E.

2/8/2008

Date

Registration Number: 60598, State: Florida





## **SPCC PLAN REVIEW (40 CFR 112.5[B])**

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

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

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

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

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

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

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

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

### **15.3 Plan Review [40 CFR 112.5(b)]**

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

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

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

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

## **LIMITATIONS**

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

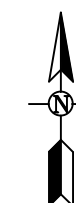
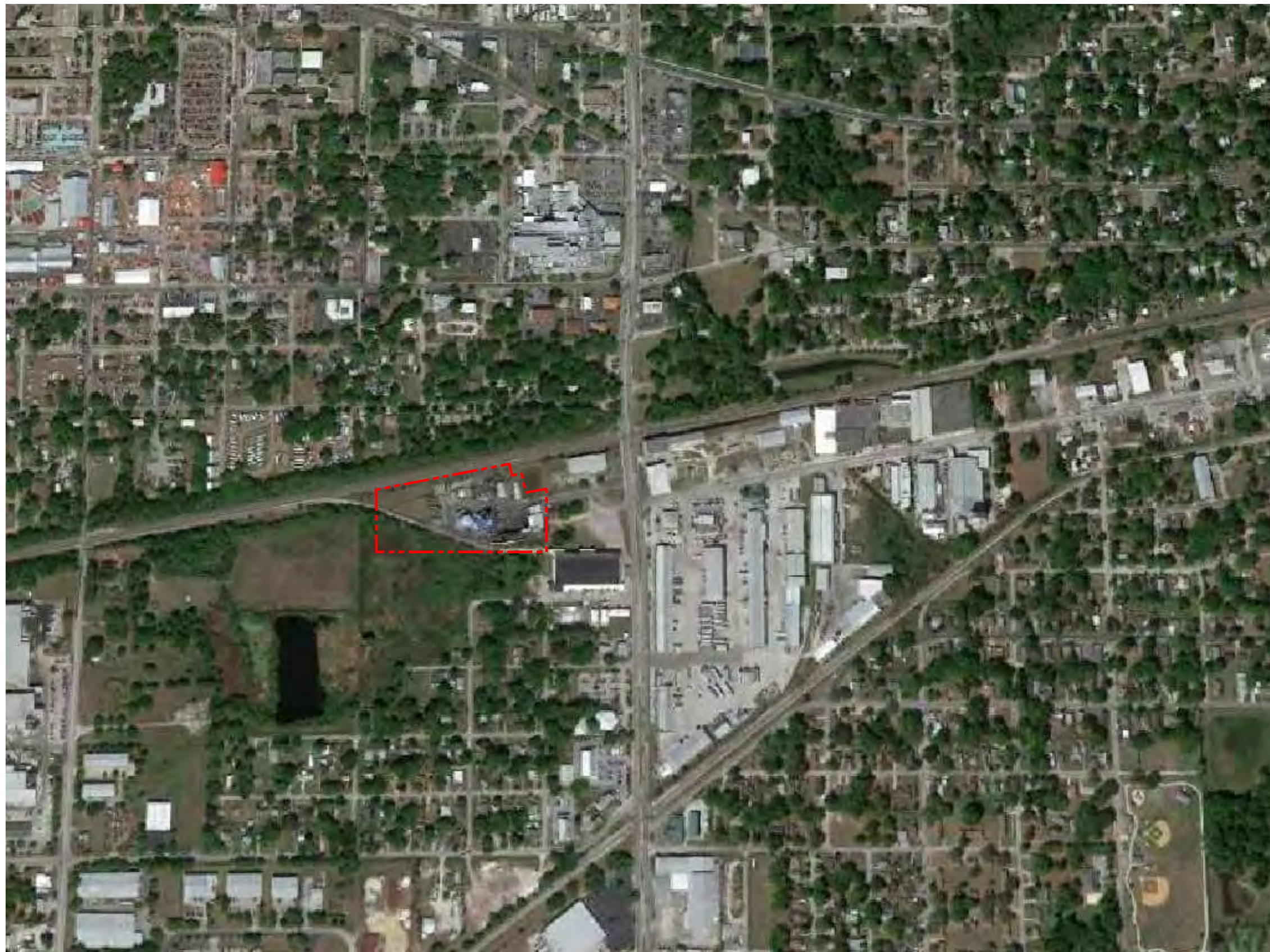
## FIGURES

**FIGURE #1**

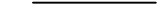
**VICINITY MAP**

**FCC ENVIRONMENTAL, LLC  
PLANT CITY, FLORIDA**





**LEGEND:**



SUBJECT PROPERTY



**FIGURE 1**  
SITE VICINITY MAP

PROJ: PLANT CITY SOLID WASTE  
MANAGEMENT FACILITY  
PLANT CITY, FLORIDA

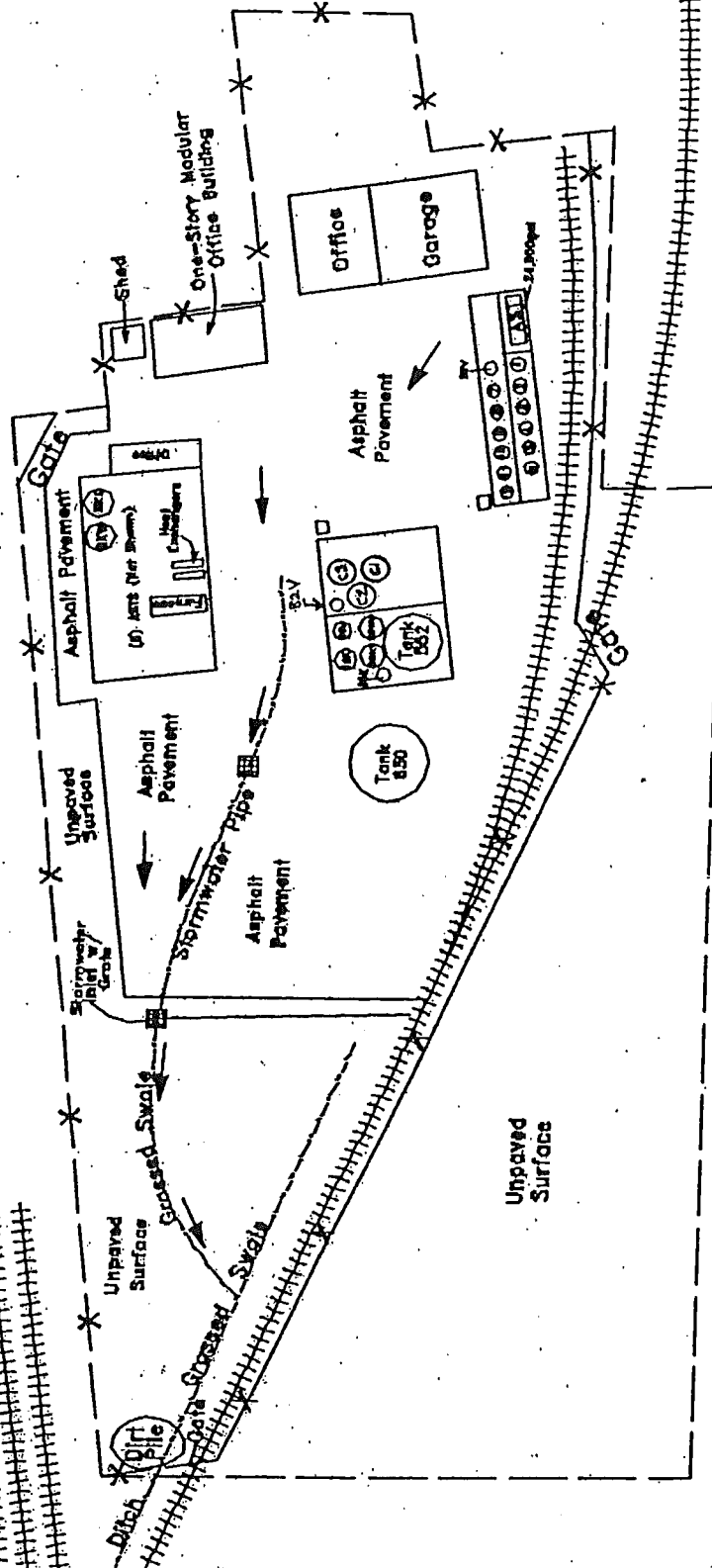
THIS IS NOT A LEGAL SURVEY VERIFY SCALE 0 NTS IF NOT 1" ON THIS SHEET, ADJUST SCALES ACCORDINGLY.	DRN BY: DCB	DATE: 6/5/13
	CHKD BY: SC	SCALE: N.T.S.
	FILE NAME: SITE PLAN 1	



**FIGURE #2**  
**SITE PLAN AND DRAINAGE MAP**  
**FCC ENVIRONMENTAL, LLC**  
**PLANT CITY, FLORIDA**

Commercial

C.S.X. TRANSPORTATION RAILROAD



Commercial

Vacant Land

# LEGEND

- Property Boundary
- Stormwater Drain
- Surface Flow
- Sumps

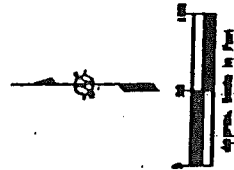


FIGURE 2: SITE MAP  
HYDROCARBON RECOVERY SERVICES, INC.  
Plant City Facility  
105 South Alexander Street  
Plant City, Florida 33566

DRAWN: KW	DATE: 3/28/03	PROJECT NUMBER: 00033-024-900	REV:
APPROV: SA			

**ATTACHMENT A**  
**CERTIFICATION OF THE APPLICABILITY OF SUBSTANTIAL HARM**  
**CRITERIA**

**FCC ENVIRONMENAL, LLC**  
**PLANT CITY, FLORIDA**



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

**FCC Environmental, LLC**  
**Plant City, Florida**

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

Yes ☐ No ☒

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

Yes ☒ No ☐

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

Yes ☒ No ☐

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

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

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

Yes ☐ No ☒

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

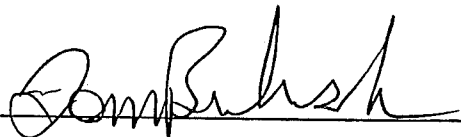
Yes ☐ No ☒

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**Certification:**

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

Signature: \_\_\_\_\_



Name \_\_\_\_\_

TOM BURDESHAW

(Please type or print)

Title: \_\_\_\_\_

PLANT MANAGER

Date: \_\_\_\_\_

020808

**ATTACHMENT B**  
**RELEASE REPORTING FORM**  
**FCC ENVIRONMENTAL, LLC**  
**PLANT CITY, FLORIDA**

**ATTACHMENT B  
RELEASE REPORTING FORM  
FCC Environmental, LLC PLANT CITY, FLORIDA**

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

DATE	LOCATION	VOLUME	CAUSE/COUNTERMEASURE
8-1-2012	MAIN CONTAINMENT TANK C-1	75-80 GL	PLANT OPERATOR FAILED TO SEE THAT TANK C-1 WAS FULL AND STARTED TO MAKE A TRANSFER TANK C-1 OVERFLOWED OIL WAS WASHED INTO SUMPS AND RECOVERED INSIDE THE CONTAINMENT AREA
10-4-2012	PARKING LOT DRUM STORAGE	10-15 GL	SEVERAL RAIN FILLED A DRUM OF USED OIL FILTERS UP WITH WATER CAUSING SOME OIL + WATER TO SPILL OVER THE TOP ONTO THE PARKING LOT WAS CLEANED UP AT ONCE WITH PADS PADS WERE PLACED IN COMPACTOR FOR DISPOSAL 5
11-7-2012	TANK # 11 IN CONTAINMENT	40-50 GL	WHILE DAVE BRANCH WAS LOADING TANK # 11 THE GAGE BECAME STUCK AND THE TANK OVERFLOWED HE WAS ABLE TO SHUT THE PUMP OFF AND APPLY DE-GRADER AND HOSE THE TANK DOWN ALL OIL WAS INSIDE THE CONTAINMENT
12-14-2012	FILTER BASKET SOUTH TANK FARM	20-6AL	WHILE JASON BOWERS WAS TRANSFERRING OIL IN THE SOUTH TANK FARM HE MAY HAVE CLOSED A VALVE AND CAUSE PRESSURE TO BUILD UP IN THE FILTER BASKET THIS CAUSED OIL TO LEAK OUT INTO THE CONTAINMENT AREA, ALL OIL WAS WASHED DOWN INTO THE SUMP AND PUMPED INTO T-630

DATE	LOCATION	VOLUME	CAUSE/COUNTERMEASURE
01/29/11	Drum Area	10 gallons	Drum of solvent partially spilled. Initially applied absorbent for the first part of the clean up followed by Quick-Dry. All material recovered and properly disposed of.
02/24/11	Railside	5 gallons	A hose, partially filled with oil, fell from a railcar. Degreaser was applied followed by hosing with water into the railside sump. All oil was recovered into the water plant.
03/02/11	Drum Area	20 gallons	Drum of AF partially spilled. Initially applied absorbent for the first part of the clean up followed by Quick-Dry. All material recovered and properly disposed of.
5-18-11	DRUM AREA	8-GALLON	DRUM OF USED OIL FILTERS TIPED OVER ALL OIL + FILTERS CLEANED UP WITH ABSORBENTS
9-21-11	SOUTH LOAD RACK CONTAINMENT AREA	10-GALLON	HOSE WAS FULL ON TRAILER #557 WITH PLUG WAS REMOVED OIL CAME OUT WAS WASHED INTO MAIN SUMP AREA SMALL AMOUNT OF DEGREASER WAS APPLIED AS WELL.
3-14-12	FRONT LINE PAD	10-15 GALLON	TRUCK 434 LEFT ONE OF HIS HOSES FULL PLANT OPERATOR REMOVED IT FOR USE PULLED PLUG AND THE HOSE DISCHARGED USED OIL ON TO OUR PAD / OIL WAS WASHED INTO SUMPS WITH PRESSURE WASHER NO ABSORBENTS USED
4-2-2012	RAIL SPUR CAR # 25045	20-GALLON	WHILE LOADING RAIL CAR WITH FINISHED OIL OVER THE TOP THE 3" LINE CAME LOSE FROM THE CAR FOR A MOMENT SPLASHING OIL ON TOP OF CAR OIL RAN DOWN SIDES OF CAR ONTO ASPHALT OIL WAS CLEANED UP WITH A VAC TRUCK / DEGREASER WAS USED WITH PRESSURE WASHER TO CLEAN ASPHALT STAINS AS GOOD AS POSSIBLE BIG BUGS WERE ALSO USED
8-1-2012	RAIL CAR SPUR	5-GALLON	WHILE LOADING RAIL CAR # GATX-43846 PLANT OPERATOR SAW THE CAR WAS FULL AND TURNED OFF THE PUMP BUT FAILED TO CLOSE THE VALVE ON TRUCK C-100 AND THE VALVE ON THIS CAR. OIL CONTINUED TO FILL THE CAR UNTIL IT STARTED TO OVER FLOW APPROX 5-GALLONS WAS SPILLED ONTO ASPHALT AND CLEANED UP WITHIN MINUTES. WITH ABSORBENT PADS



# SPILL LOG

ONE GALLON OR MORE

DATE	LOCATION	VOLUME	CAUSE/COUNTERMEASURE
03/23/09	Front Line Asphalt area	2 gal	Hose left hooked to truck when moved. Cleaned with absorbents and dusted with Portland cement.
5/22/09	Front Line sump - power outage	5 gal	Breacher broke out, pump went off. Oil in sump overflowed and went to OWS. OWS stopped oil. Cleaned up (skinned) w/ vac truck. Very heavy rains. 3" / day. Looking at separating electrical service for this sump.
5/5/10	Shaker pump / tub	5 gal	Shaker pump stopped, but feed pump did not. Oil overflowed tub, ran to sump (contained). Monarch driver ran, throw oil in trench, went to sump, tracked oil, outside containment, onto asphalt. Cleaned up with absorbents + Portland cement.
8-11-10	Tank #5	< 5 gal	Tank #5 overflowed during filling. Oil cleaned & recovered through sump.
8-16-10	Drum P-20	2 gal	Drum slipped off drum lifter. Cleaned with absorbents & dusted with portland cement.
1/18/11	Plant Sumps	10-15 gal	Plant sumps overflowed during downhill. Some oil flowed to OWS and was recovered. Slight sheen observed in ditch was treated with tobacco "bags."

**ATTACHMENT C**  
**MONTHLY FACILITY INSPECTION REPORT**  
**FCC ENVIRONMENTAL, LLC**  
**PLANT CITY, FLORIDA**



**ATTACHMENT C  
MONTHLY FACILITY INSPECTION REPORT**

**FCC Environmental, LLC  
PLANT CITY, FLORIDA**

Instructions:

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

1. Facility: \_\_\_\_\_

2. Date of Inspection: \_\_\_\_\_

3. Any unrecorded changes to facility? Yes\_\_\_\_ No\_\_\_\_

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

\_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

4. Adequate Inventory of Spill Cleanup Materials? Yes\_\_\_\_ No\_\_\_\_

5. Adequate condition of oil absorbent barriers, berms, and/or other SPCC measures? Yes\_\_\_\_ No\_\_\_\_

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

\_\_\_\_\_

6. Any evidence of leakage or spills? Yes\_\_\_\_ No\_\_\_\_

If "yes," describe below and give recommendations.

\_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

7. \_\_\_\_\_  
Name of Inspector (print)

8. \_\_\_\_\_  
Signature

**ATTACHMENT D**  
**SPCC PLAN REVIEW AND AMENDMENT LOG**  
**FCC ENVIRONMENTAL, LLC**  
**PLANT CITY, FLORIDA**



**ATTACHMENT E**

**SPCC PLAN FIVE YEAR REVIEW AND EVALUATION**

**FCC ENVIRONEMNTAL, LLC**  
**PLANT CITY, FLORIDA**

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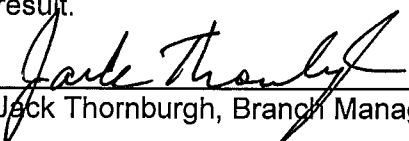
**ATTACHMENT E**

**SPCC PLAN FIVE YEAR REVIEW AND EVALUATION [40 CFR 112.5(B)]**

**HYDROCARBON RECOVERY SERVICES INC.**

**PLANT CITY, FL**

I have completed a review and evaluation of the SPCC Plan for the Hydrocarbon Recovery Services, Inc. Plant City Florida facility on July 14, 2008 and will not amend the Plan as a result.

  
\_\_\_\_\_  
Jack Thornburgh, Branch Manager

7/14/08  
\_\_\_\_\_  
Date

**ATTACHMENT E**  
**SPCC PLAN FIVE YEAR REVIEW AND EVALUATION [40 CFR 112.5(B)]**  
**FCC ENVIRONEMNTAL, LLC**  
**PLANT CITY, FL**

I have completed a review and evaluation of the SPCC Plan for the FCC Environmental, LLC Plant City Florida facility on May 14, 2013. There were administrative changes, but not any engineering changes according to my knowledge that would require a PE certification and stamp. This was reviewed with Angelo Pousa, Area Manager and Scott Crandall, EHS Director.



\_\_\_\_\_  
Vinnie N. Glorioso

5/14/2013

Date

# **Fire Protection and Emergency Action Plan**

This program supersedes  
any existing programs.



**BRANCH/FACILITY LOCATION:**

**105 S. Alexander Street, Plant City, FL 33563**

May 2013

# Fire Protection & Emergency Action Plan

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## **STATEMENT OF POLICY**

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

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

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

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

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

Angelo Pousa  
Facility Manager

## **1.0 Purpose**

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

## **2.0 Scope/Applicability**

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

## **3.0 Definitions**

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

- **Planned Impairment:** Occurs when it is necessary to shut down a fire protection system for maintenance or modification. Examples: Shutting down a halon fire suppression system to relocate discharge nozzles or shutting off a sprinkler system during remodeling.
- **Emergency Impairment:** Occurs when an unforeseen incident or accident partially or totally impairs the protective system. Examples: Sudden break in an underground water main, forklift damages a sprinkler system facility line.
- **Hidden Impairment:** Occurs when it is not known that an impairment has occurred. Examples: System is shut down and inadvertently left out of service upon completion of work, shut down without proper notification, or maliciously impaired.

## **4.0 References**

29 CFR 1910.37, 1910.38, 1910.157

## **5.0 Responsibility**

### **5.1 Project/Branch Manager**

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

### **5.2 EHS Manager**

The EHS Manager monitors and audits compliance with this program.

### **5.3 Supervisors**

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

### **5.4 Employees**

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

## **6.0 Requirements**

### **6.1 Training**

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

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

### **6.2 Drills**

Emergency evacuation drills are conducted annually for all shifts.

### **6.3 Plan Updates**

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

### **6.4 Emergency Operations Center/Emergency Coordinator**

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

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

## **6.5 Communication Systems**

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

## **6.6 Emergency Escape Procedures and Routes**

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

## **6.7 Assembly areas and accounting for employees**

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

## **6.8 Procedure to shut down processes, equipment, etc.**

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

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

## **6.9 Emergency Procedures**

### **6.9.1 Fire**

IF YOU DISCOVER A FIRE OR SMELL SMOKE:

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

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

#### **6.9.2 Medical**

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

##### **Call immediately for medical attention:**

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

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

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

### **6.9.3 First Aid/CPR**

First aid/CPR response is limited to the following:

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

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

All first aid responders receive Bloodborne Pathogen control training annually.

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

### **6.9.4 Tornado**

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

### **6.9.5 Bomb Threat**

ANY PERSON RECEIVING A BOMB THREAT CALL SHOULD:

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

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

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

**6.9.6 Hazardous Materials**

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



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

#### **6.9.7 Earthquake**

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

#### **6.9.8 Power Failure**

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

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

#### **6.9.9 Civil Disturbance/Strike**

IF THERE IS A CIVIL DISORDER OCCURRENCE:

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

#### **6.9.10 Hurricane**

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

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

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

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

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

## **6.10 General Procedures**

### **6.10.1 Cutting, Welding, And Other Hot Work**

REFER TO THE FCC ENVIRONMENTAL HOT WORK PROGRAM.

### **6.10.2 Electrical Fire Safety**

REFER TO THE FCC ENVIRONMENTAL ELECTRICAL SAFETY PROGRAMS.

## **6.11 Housekeeping**

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

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

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

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

**Smoking:** Smoking shall only be allowed in designated areas.

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

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

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

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

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

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

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

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

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

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

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

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

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

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

#### **6.12 Smoking**

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

#### **6.13 Spray Finishing**

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

#### **6.14 Flammable and Combustible Liquids**

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

#### **6.15 Fire Doors**

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

#### **6.16 New Construction**

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

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

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

#### **6.17 Insurance Company Loss Prevention Surveys**

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

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

#### **6.18 Fire Protection Equipment**

##### **6.18.1 Fire Protection Equipment Approvals**

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

##### **6.18.2 Fire Protection System Impairments**

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

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

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

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

#### **6.18.2.1 Planned Impairment Procedures**

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

begin immediately if this is not considered practical.

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

#### **6.18.2.2 Red Tag Alert System**

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

#### **6.18.2.3 Emergency Impairment Procedures**

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

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

#### **6.18.2.4 Hidden Impairment Procedures**

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



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

- Notify FCC Environmental Management and casualty insurance company.

#### **6.18.2.5 Restoring System**

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

### **6.19 Self Inspections/Maintenance/Testing for Automatic Sprinkler Systems**

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

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

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

#### **6.19.1 Monthly Inspection Reports (MIR)**

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

### **6.20 Media Relations/Crisis Management**

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

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

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

## **7.0 Records Retention**

This program must be current at all times.

## **8.0 Forms Required**

See Exhibits

## **9.0 Exhibits**

Exhibit I – Evacuation Routes Diagram

Exhibit II - Assembly Area Diagram

Exhibit III – Bomb Threat Checklist

Exhibit IV – Fire Extinguisher Training

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

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

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

Evacuation Siren

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

Monthly

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

Yes

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---

10.4 Emergency phone numbers for:

Fire: 911 \_\_\_\_\_

Police 911 \_\_\_\_\_

EMT 911 \_\_\_\_\_

Hazardous Materials Clean-up Contractor: SWS \_\_\_\_\_

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

Main Office \_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

10.6 The alternate EOC is (enter location):

Sales office \_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

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

Angelo Pousa 813-754-1504 x 3117 Cell 954-868-1376 \_\_\_\_\_

5639 Superior Drive Lakeland FL 33805 \_\_\_\_\_

\_\_\_\_\_

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

Mike Bisson 813-754-1504 x 3126 \_\_\_\_\_

6521 Clair Shore Dr. Apollo Beach FL 33572 \_\_\_\_\_

\_\_\_\_\_

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

Cell Phones \_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

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

All buildings

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

All buildings

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

Angelo Pousa or Mike Bisson

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

Front Office, Lab, Sales Office, Field Service Office

- 10.14 The following areas are designated as tornado shelter areas:

N/A

- 10.15 The Facility designated smoking area(s) is:

West outside corner of the Sales Office, and slightly North of Scale House

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

Does not have an automatic sprinkler system.

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

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

- 10.19 The following are the Corporate Communications contact personnel and phone numbers (list all available phone numbers for each person):  
Angelo Pousa 954-868-1376  
Mike Bisson 813-478-5342  
Scott Crandall 813-335-5341

- 10.20 Annual fire extinguisher inspections are performed by (enter name of company):  
4<sup>th</sup> Element Fire and Safety  
503 Dundee Road Dundee FL

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

- 10.22 Training records can be obtained from (list alternates):  
Angelo Pousa, Mike Bisson, Alan Stinson

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

Every Year in August

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**EXHIBIT I**

**EVACUATION ROUTES DIAGRAM**

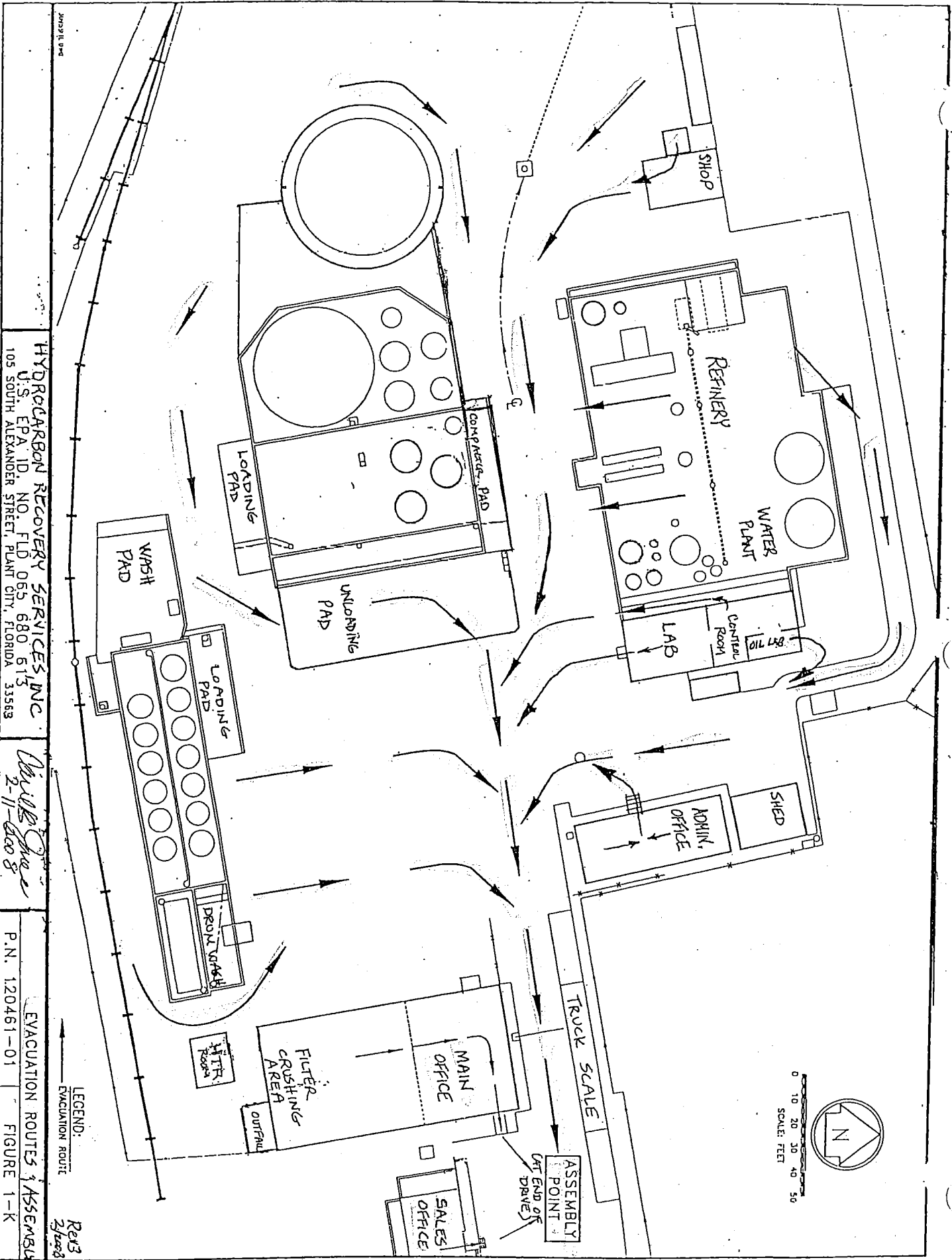
**Insert Facility Specific Evacuation Diagram Here**

**EXHIBIT II**

**ASSEMBLY AREA DIAGRAM**

**Insert Facility Specific Assembly Area Diagram Here**





HYDROCARBON RECOVERY SERVICES INC.  
 U.S. EPA ID, NO. FLD 065 680 613  
 105 SOUTH ALEXANDER STREET, PLANT CITY, FLORIDA 33568

*David S. Jones*  
 2-11-88

P.N. 120461-01

EVACUATION ROUTES  
 FIGURE 1-K

Rev 3  
 2/11/88  
 AEC4

**EXHIBIT III**

**BOMB THREAT CHECKLIST**

Name of operator, or person receiving call \_\_\_\_\_

Date of Call \_\_\_\_\_ Time \_\_\_\_\_ ☐ a.m. ☐ p.m.

Origin of Call: (If Known)

Local ☐ Long Distance ☐ Phone Booth ☐ Internal ☐

Identity of Caller:

Voice

- ☐ Loud
- ☐ High Pitch
- ☐ Raspy
- ☐ Intoxicated

Speech

- ☐ Soft
- ☐ Deep
- ☐ Pleasant

☐ \_\_\_\_\_  
Other

Language

- ☐ Fast
- ☐ Distant
- ☐ Stutter
- ☐ \_\_\_\_\_

- ☐ Slow
- ☐ Distorted
- ☐ Nasal

Other

- ☐ Good
- ☐ Foul
- ☐ Poor

Accent

- ☐ Local
- ☐ Foreign
- ☐ Racial
- ☐ Regional

\_\_\_\_\_  
Type

Manner

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

Sex

- ☐ Male
- ☐ Female

Background Noise

- ☐ Office Machines
- ☐ Factory Machines
- ☐ Animals
- ☐ Airplanes
- ☐ Street Traffic
- ☐ Trains
- ☐ Music
- ☐ Quiet
- ☐ Voices

☐ \_\_\_\_\_  
Other

Who did you inform about the call? \_\_\_\_\_

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

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

**BOMB THREAT CHECKLIST**

**Questions To Ask**

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

Remarks: \_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

Person receiving call: \_\_\_\_\_

Telephone number call received at: \_\_\_\_\_

Date: \_\_\_\_\_

## EXHIBIT IV

### MONTHLY SAFETY TOPIC

#### FIRE EXTINGUISHER TRAINING

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

#### Fire Chemistry

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



#### Classifications of Fires:

All fires are grouped according to the type of fuel involved.

Class A – ordinary combustibles – wood, paper, cloth

Class B – liquids or gases

Class C – energized electrical equipment

Class D – combustible metals – magnesium, sodium, lithium

## Fire Extinguishers

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

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

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

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

Most fire extinguishers provided are A – B – C dry chemical. These fire extinguishers stop the chemical chain reaction, or halon. Some CO<sub>2</sub> extinguishers may be present. Discuss the types of extinguishers at your location and the fires they can fight.



## Fire Fighting Techniques

Fire fighting at FCC Environmental is restricted to incipient stage (wastebasket size) fires.

If the fire is larger than this size, evacuate the building and then call the fire department.

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

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

### **Remember P.A.S.S.**

**P**ull the pin

**A**im at the base of the fire

**S**queeze the handle

**S**weep from side to side

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

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

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

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

### **Caution! Fighting a fire can be dangerous!**

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

### **Inspection, Maintenance and Testing**

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

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

### Other Helpful Tips for Workplace Fire Safety

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

### What's wrong with these pictures?



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## Fire Extinguisher Quiz



Name \_\_\_\_\_ Date \_\_\_\_\_

What are the four elements necessary to have a fire?

- a. \_\_\_\_\_
- b. \_\_\_\_\_
- c. \_\_\_\_\_
- d. \_\_\_\_\_

What types of fires are fought by FCC Environmental employees?

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

List the classification of fires:

1. \_\_\_\_\_
2. \_\_\_\_\_
3. \_\_\_\_\_
4. \_\_\_\_\_

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

1. \_\_\_\_\_
2. \_\_\_\_\_
3. \_\_\_\_\_
4. \_\_\_\_\_
5. \_\_\_\_\_

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

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

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

The emergency evacuation alarm system at my facility is:

\_\_\_\_\_



## Fire Extinguisher Quiz **Key**

Name \_\_\_\_\_



What are the four elements necessary to have a fire?

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

What types of fires are fought by FCC Environmental employees?

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

List the classification of fires:

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

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

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

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

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

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

The emergency evacuation alarm system at my facility is:

**Each facility must supply the correct answer**

## FIRE PREVENTION AND EMERGENCY ACTION PLAN ANNUAL CERTIFICATION AND REVISION TABLE

[illegible]

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**FCC ENVIRONMENTAL, LLC  
PLANT CITY, FLORIDA  
ATTACHMENT 7  
UNIT MANAGEMENT PLAN**

***USED OIL***

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

Container and storage tanks that store used oil are labeled “Used Oil”. Tanks that store used oil, or that may contain mixtures containing used oil, are listed in a table included at the end of this attachment. The table shows the storage tank volumes, material stored, and installation dates. (Please note tanks T-83 and T-150 have been properly closed/removed according to 62-761 F.A.C.; please see letter included at the end of this attachment).

All used oil containers are stored with adequate aisle space to allow the unobstructed movement of personnel, fire protection equipment, spill control equipment, and decontamination equipment to any area of the facility operation in an emergency. The block walls and floors have been epoxy painted so that they are sufficiently impervious to used oil, thus preventing any used oil released into the containment system from migrating outside its boundary to the soil, groundwater, or surface water. Oily waste drums are stored in or outside the garage area. This area is underlain with epoxy-coated concrete and meets the requirements for secondary containment. If any container holding waste is not in good condition (e.g., if severe rusting or structural defects are apparent) or if it begins to leak, FCC personnel will transfer the waste from this container to another container that is in good condition or overpack to prevent release. At least daily, FCC personnel visually inspect areas where containers are stored, looking for leaking containers and for deterioration of containers. (Any facility generated hazardous waste containers are placed in accordance with the 50-foot setback rule and with adequate aisle space.)

All used oil storage tanks met the conditions for existing aboveground tanks in 40 CFR 279.54(d) and 62-762 F.A.C. The secondary containment for these tanks includes retaining walls of concrete blocks and reinforced concrete. The entire area inside the retaining walls is underlain with concrete that is free of cracks and sufficiently impervious to prevent any used oil released into the containment system from migrating



to the soil, groundwater, or surface water. The containment areas have also been sealed with epoxy.

The facility contains three batteries (South, West and Refinery) and one “tank within a tank” (T-630). The storage tanks and piping are constructed of steel, and all of FCC’s aboveground storage tanks are located within a containment area. The secondary containment systems have sufficient capacity, greater than 110 percent of the volume of the largest container. The containment system capacity for South Tank Battery is approximately 60,794 gallons, the West Tank Battery is approximately 116,692 gallons, Refinery is approximately 50,310 gallons, and Tank T-630 is approximately 697,837 gallons. The volume calculations are presented in the attached Spill Prevention, Control and Countermeasure (SPCC) Plan. Precipitation that enters the tank storage area and the secondary containment area is pumped into the on-site water storage tanks for treatment. A description of the drainage facilities at the Plant City facility is presented as Section 7 of the SPCC Plan.

All aboveground used oil process and storage tanks are properly labeled with the words “Used Oil.” All tanks at FCC are steel aboveground storage tanks equipped with overfill protection. All oil piping is aboveground, so there is no contact with the soil. Any new aboveground storage tanks constructed of steel will meet or exceed the requirements found in UL No. 142, API Standard No. 620, API Standards No. 650, API Standard No. 12B, API Standard No. 12D, or API Standard No. 12F (or as required by 62-762 F.A.C.).

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

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



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

#### ***USED OIL FILTERS***

Used Oil Filters are managed in DOT-approved containers and kept properly closed to protect them from inclement weather. The drums are stored in or near the southeast garage area. The final crushed or “cubed” filters are stored and transported in 4,500-to 5,000-pound bins.

#### ***INDUSTRIAL WATERS***

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

#### ***PETROLEUM CONTACT WATERS***

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

#### ***OILY WASTE***

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

Table 1

**Summary of Aboveground Storage Tanks  
FCC Environmental, LLC – Plant City Facility  
Plant City, Florida**

<b>Tank ID Number</b>	<b>Volume (Gallons)</b>	<b>Material Stored</b>	<b>Alternate Material Stored*</b>	<b>Date Installed</b>
<i>South Tank Farm</i>				
1	14,700	Residual Oils, 5	Antifreeze	5/1980
2	14,700	Used Oil	Residual Oils, 5	5/1980
3	15,000	Used Oil	Residual Oils, 5	5/1980
4	15,000	Used Oil	Residual Oils, 5	5/1980
5	15,000	Used Oil	Residual Oils, 5	5/1980
6	18,800	Used Oil	Residual Oils, 5	5/1980
7	14,100	Used Oil	Residual Oils, 5	5/1980
8	14,100	Used Oil	Residual Oils, 5	5/1980
9	14,700	Used Oil	Residual Oils, 5	5/1980
10	14,700	Used Oil	Residual Oils, 5	5/1980
11	18,800	Used Oil	Residual Oils, 5	5/1980
12	24,000	Used Oil	Residual Oils, 5	5/1980
20V	20,700	Antifreeze	Used Oil	5/1980
24K	24,000	Used Oil	Residual Oils, 5	5/1980
<i>West Tank Farm</i>				
C1	30,000	Used Oil	Residual Oils, 5	6/2005
C2	30,000	Used Oil	Residual Oils, 5	6/2005
C3	30,000	Used Oil	Residual Oils, 5	6/2005
552	500,000	Number 5 Oil		7/1989
20KV	20,000	Used Oil	Residual Oils, 5	7/1989
30KV	30,000	Used Oil	Residual Oils, 5	5/1989
10K	10,000	Truck Diesel	Residual Oils, 5	7/1989
D5K	5,000	Oily Water	Residual Oils, 5	1/1999
10V	10,000	Rainwater (non-regulated)		7/1989
82V	8,200	Rainwater (non-regulated)		7/1989
<i>Refinery Area</i>				
SK-W	44,650	Oily Water (non-regulated, wastewater treatment/processing)		7/1987
SK-E	44,650	Oily Water (non-regulated, wastewater treatment/processing)		9/1987
<i>Tank T-630 “Tank within a Tank”</i>				
T-630	630,000	Used Oil	Residual Oils, 5	9/1999

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



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**FCC ENVIRONMENTAL, LLC  
PLANT CITY, FLORIDA  
ATTACHMENT 8  
CLOSURE PLAN**

The FCC Plant City facility located at 105 South Alexander Street is designed, constructed, and operated to minimize any threat to the environment. The closure plan will be updated whenever significant operational changes occur or design changes are made. The closure plan will be maintained with records required under Rules 62-701 and 62-710, Florida Administrative Codes (FAC). A Solid Waste Closure Cost Estimate, for which financial assurance is required, is presented for those aspects of the facility engaged in the handling of solid wastes. Solid waste operations are limited to the container storage areas.

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

***CLOSURE PERFORMANCE STANDARD***

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

- There will be no need for further facility maintenance;
- Used oil will not contaminate surface or groundwater;
- All tanks, piping, secondary containment, and ancillary equipment will be emptied, cleaned, and decontaminated, and all storage materials removed and managed; and
- All aboveground storage and process tanks will be closed pursuant to Rule 62-762.801(3) and (4).

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



achieving closure certification are a business item not within the scope of this Closure Plan.

#### ***VERIFICATION OF CLOSURE PERFORMANCE STANDARD***

The Final Closure of the FCC Plant City facility will require characterization of soil and groundwater quality conditions. The relevant Clean-up Target Levels for soil and groundwater are contained in FAC Rule 62-777.170. Petroleum Product Contaminants of Concern are defined in Rule 62-770. Sampling and analytical protocols will be in accordance with U.S. EPA SW-846 Methods. In general, disposal analyses will be required for Florida pre-burn constituents. Metals will be analyzed by Method 6010c or Graphite Furnace Method (7470A for liquids, 7471B for solids) for mercury; volatile and semi-volatile organics will be analyzed by Methods 8260/8270. The laboratory will use other U.S. EPA-approved methods appropriate to the sample matrix and analytical requirements.

The Florida regulations do not contain any specific guidelines for determining whether equipment, tanks, and containment have been successfully decontaminated. A visual inspection of all tanks will be performed to insure that no solids, sludges or residual oils are present.

#### ***CLOSURE OF TANK STORAGE***

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

Liquid wastes will be removed via the tank piping system and handled as an oily waste. Material that cannot be removed via the piping system will be accessed via the tank manways or hatches. Confined space entry procedures will be followed. Residual liquid and sludge material at the bottom of each tank will be removed via pumping and handled as an oily sludge. Solid material at the bottom of the tank that cannot be removed as sludge will be removed and handled as an oily solid. FCC shall make a proper waste determination to include TCLP testing for 8260 and metals.

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





## ***CLOSURE OF TANK FARM CONTAINMENT***

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

## ***CLOSURE OF CONTAINER STORAGE AREA***

Maximum container storage:

<b>non-hazardous drums:</b>	<b>400</b>
<b>hazardous drums:</b>	<b>20</b>
<b>30-yard roll-off boxes:</b>	<b>1</b>
<b>20-yard roll-off boxes</b>	<b>3</b>

Upon closure, containers in storage will be tested as necessary to confirm hazardous waste classification status, removed, and shipped to a proper disposal facility. Once all containers are removed, decontamination of the container storage will take place. Manual scraping will be performed to remove any hardened material. Mechanical scrubbing will be used if necessary. The containment area will then be pressure-washed until the visual inspection performance standard is achieved. All materials used in the decontamination will be either processed through the facility waste treatment system, or contained and shipped off site to the proper disposal facility.

## ***DECONTAMINATION OF WASTE TREATMENT SYSTEM***

Once wastewater generated by the decontamination of the tanks and containment areas has been processed, the waste treatment system will be decontaminated. Tanks will be decontaminated in a manner similar to the storage tanks. Manual scraping will be performed to remove any hardened material. The waste treatment equipment and associated containment areas will then be pressure-washed until the visual inspection performance standard is achieved.

## ***VISUALLY CONTAMINATED SOILS***

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

## ***CLOSURE ASSESSMENT***

Rule 62-762.801(4) requires the completion of a Closure Assessment. The closure assessment may be implemented either in parallel with or at the conclusion of the general decontamination of the facility. Waste material generated through investigation will be managed to the maximum possible extent through the facility waste management and



treatment systems. Otherwise, investigative wastes will be separately managed and tested if has impacted soils and groundwater. As such, the initial Closure Assessment will not provide a complete horizontal and vertical characterization of any discovered contamination. The comprehensive development of a Site Conceptual Model and Site Characterization would be addressed as a contingent item.

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

Soil sampling will be accomplished by either grab samples from Geoprobe liners, hand augers or samples from auger split-spoon sampling. Soils samples will be selected for testing based upon visual and field meter evidence of contamination status. Samples will be obtained from the 0- to 2-foot Direct Contact interaction zone. If obvious contamination extends, samples will be obtained.

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

FCC anticipates 30-40 shallow borings will be required to perform the site closure assessment. Of course if contamination is determined to be present in soil and or ground water additional sampling and assessment would be required. The 30-40 borings is based on 10 boring around the three tank farm, and 10 borings throughout other areas of the site of potential concern. The soil borings are proposed to be 2 feet below ground surface, unless contamination is observed and a deeper boring is necessary. Samples showing visual indications of contamination shall be sampled and tested for total petroleum hydrocarbons (TPH), 8 RCRA metals and organic volatiles by EPA Method 8260. Groundwater status will be determined by installing temporary monitoring wells. Test borings will not be completed as permanent monitoring wells unless site-specific conditions observed during the investigation warrant.

Six temporary groundwater wells are contemplated as part of the closure assessment. Additional temporary wells could be needed based on soil sampling results. These temporary monitoring wells shall be sampled for TPH, 8 RCRA Metals and volatiles by EPA Method 8260.

If soil and/or groundwater are determined to be contaminated by the reconnaissance Closure Assessment, it will be necessary to implement a more comprehensive closure plan. Any remaining soil or groundwater contamination will be assessed and remediated in accordance with the requirements of Contaminated Site Cleanup Criteria found at F.A.C. Rules 62-770, 62-777, and 62-780, as appropriate. The closure plan will be modified to incorporate the requirements of the Rules 62-770, 62-777, and 62-780, as appropriate, if necessary, including applicable public notice requirements.



## ***CLOSURE COST ESTIMATE***

The Closure Plan is based on an orderly planned shutdown of the facility by FCC. FDEP requires, however, that the Closure Cost Estimate be based on a worst-case scenario. That scenario is generally considered to be an unplanned situation in which the State will be responsible for implementing site closure using contractors hired by the State. It assumes that all tanks are full of material and that all contents of all tanks must be characterized to determine hazardous waste classification status. It also assumes that the on-site treatment processing equipment is not operational and that all materials must be transported off site for processing and appropriate disposal. The demolition of facilities is not considered to be a requirement for decontamination.

The total closure Decontamination Cost Estimate, as of 2013, for the FCC Plant City facility is **\$964,991**.



# FLORIDA DEPARTMENT OF ENVIRONMENTAL PROTECTION

BOB MARTINEZ CENTER  
2600 BLAIRSTONE ROAD MS 4565  
TALLAHASSEE, FLORIDA 32399-2400

RICK SCOTT  
GOVERNOR

HERSCHEL T. VINYARD JR.  
SECRETARY

May 7, 2013

Via e-mail: [scott.crandall@fccenvironmental.com](mailto:scott.crandall@fccenvironmental.com)

Scott Crandall, PE  
EH&S Manger  
FCC Environmental, LLC  
105 S. Alexander Street  
Plant City, FL 33563

Re: FLD 984 262 410 FCC Environmental, LLC (Pompano Beach)  
FLO 000 346 304 FCC Environmental, LLC (Ft. Pierce)  
FLD 065 680 613 FCC Environmental, LLC (Plant City)  
FLR 000 069 088 FCC Environmental, LLC (Orlando)  
FLR 000 031 393 FCC Environmental, LLC (Jacksonville)  
WACS 42485 FCC Environmental, LLC (Plant City MRF)

Dear Mr. Crandall:

A review of the documentation submitted to demonstrate financial assurance for the above referenced facilities finds it is in order. Zurich American Insurance Company/Fidelity and Deposit Company of Maryland performance bond number PRF09110927, effective April 12, 2013, in the amount of \$2,629,174, adequately covers the approved closing cost estimates submitted in February 2013 for the above referenced facilities. Therefore, the above referenced facilities are in compliance with the financial assurance requirements of 40 CFR Part 264, Subpart H, as adopted by reference in Rule 62-701.630, Florida Administrative Code, at this time.

Please contact me at (850) 245-8740 if you have any questions.

Sincerely,

Susan Eldredge  
Environmental Specialist  
Solid Waste Section

cc: Financial Assurance Coordinator, DEP/Tallahassee  
Susan Pelz, DEP/Orlando  
Bheem Kothur, DEP/Used Oil Program

**FCC Environmental, LLC  
POMPAÑO BEACH, FLORIDA FACILITY**

**TABLE 2  
CLOSURE DECONTAMINATION COST ESTIMATE**

**Unit Transportation and Disposal Costs**

Oily water	\$0.16	\$/Gal
Oily Sludge Liquid	\$1.44	\$/Gal
Oily Solids (Non-Haz)	\$42.00	\$/Ton
Oily liquids (Haz)	\$1.25	\$/Gal
Oily Solids (Haz)	\$150.00	\$/Ton
Virgin vehicle fuels	\$0.00	\$/Gal (may assume zero cost with salvage value)

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

<b>Site Safety and Operations Plan</b>	10000	Lump Sum
		\$10,000

**TANKS - DISPOSAL OF INVENTORY AND DECONTAMINATION**

Total Number of Tanks	27	\$/Sample	
Tank Content Characterization TCLP+PCB		\$1,200	\$32,400

**Maximum Inventory**

**Tank Liquids**

Tank Liquids			% vol. Pumpable	Pump volume	Disposal cost	Disposal Cost
Total Number of Tanks	27				as oily water	
Total tank volume, gal	1623700	90		1461330	\$0.16	\$233,813
vehicle diesel, gal	10,000	95		9500	\$0.00	\$0

**Liquid/sludge by Vac Truck**

Liquid/sludge by Vac Truck	% vol.Vac Truck	Vac volume	Disposal cost as oily sludge	Disposal Cost
Total Number of Tanks	27			
Total tank volume, gal	1623700	3	\$1.44	\$70,144
vehicle diesel, gal	10000	5	\$1.44	\$720

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

**Solids Removal**

Solids Removal	% vol. Solids	Solids volume	Disposal cost	Disposal Cost
Total Number of Tanks	27		as oily solids	
Total tank volume, gal	1633700	7	560.3591	\$42.00
vehicle diesel, gal	10000	0	0	\$42.00
				\$23,535
				\$0

**Initial Tank Cleaning for 24 Hours with Pressure Cleaning (as % tank volume)**

Initial Tank Cleaning for 24 Hours with Pressure Cleaning (as % tank volume)	% vol. Vac Truck	Gal Vac Volume	\$/Gal Disposal cost as oily sludge	Total Disposal Cost
Total Number of Tanks	27			
Total tank volume, gal	1623700	2	32474	\$1.44
vehicle diesel, gal	10000	0	0	\$1.44
				\$46,763
				\$0

**High Pres. Clean (as % tank volume)**

High Pres. Clean (as % tank volume)		% vol. Vac Truck	Gal Vac Volume	\$/Gal	Disposal cost	Disposal Cost
Total Number of Tanks	27				as oily water	
Total tank volume, gal	1623700	3	48711	\$0.16		\$7,794
vehicle diesel, gal	10000	2	200	\$0.16		\$32
(includes associated piping, appurtances, etc)						

(includes associated piping, appurtances, etc)

**Containment Pressure Clean (as % tank volume)**

Containment Pressure Clean (as % tank volume)		% vol. Vac Truck	Vac Volume	Disposal cost	Disposal Cost
Total Number of Tanks	27			as oily water	
Total tank volume, gal	1623700	2	32474	\$0.16	\$5,196
vehicle diesel, gal	10000	0	0	\$0.16	\$0

Container Storage Areas	Number Units	Gal or Tons total volume	Gal or Tons \$/Unit T&D)	
Non-Haz Drums, solids	200	52	\$42.00	\$2,184
Non-Haz Drums, liquids	200	11000	\$0.16	\$1,760
Haz Drums, Liquids	10	550	\$1.25	\$688
Haz Drums, solids	10	2.6	\$150.00	\$390
Roll-off boxes (@20cy/box)	4	104	\$42.00	\$4,368
Surficial stained soil boxes	1	26	\$42.00	\$1,092
General cleanup				
<b>Container Characterization - 10% of Drums + rolloff boxes</b>		TCLP cost		
Number analytical samples	35		\$1,200.00	\$42,000

### Inventory & Decontamination Manpower Costs

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

Assume 43 Work Days for Disposal of Material Inventory and  
Labor Crew Size 5 Decontamination of Tanks and Site Equipment

Classification	Man-days	Daily Cost	Total Cost
Engineer, Mgr @33%time	14	945.28	\$13,414
Project Engineer, Site Supervisor	43	600.88	\$25,838
Haz Waste Laborer	215	341.76	\$73,478
			\$112,730
			\$112,730

<b>Summary Report of Decontamination Activities</b>	Lump Cost	\$10,000	\$10,000
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	Number days	Cost	
<b>Equipment Rental Costs, Supplies, Safety, Etc.</b>	43	\$500	Per day \$21,500
<b>Cleanup Verification Samples (#tanks + 30%)</b>	36	\$250	Per sample \$9,000

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

<b>Total Decommissioning Cost</b>	<b>\$662,107</b>
Contingency %	15 \$99,316
Administrative %	10 \$66,211
<b>TOTAL CLOSURE DECONTAMINATION COST ESTIMATE</b>	<b>\$827,634</b>

2003 Cost Estimate x 1.015 = 2004 Cost Estimate	\$827,634	1.015	\$840,048
2004 Cost Estimate x 1.020 = 2005 Cost Estimate	\$840,048	1.02	\$856,849
2005 Cost Estimate x 1.030 = 2006 Cost Estimate	\$856,849	1.03	\$882,555
2006 Cost Estimate x 1.030 = 2007 Cost Estimate	\$882,555	1.03	\$909,032
2007 Cost Estimate x 1.030 = 2008 Cost Estimate	\$909,032	1.03	\$936,302
2008 Cost Estimate x 1.030 = 2009 Cost Estimate	\$936,303	1.025	\$956,261

2009 Cost Estimate x 1.030 = 2010 Cost Estimate	\$956,261	1.02	<b>\$976,220</b>
2010 Cost Estimate x 1.030 = 2011 Cost Estimate	\$976,220	1.01	<b>\$996,179</b>
2011 Cost Estimate x 1.030 = 2012 Cost Estimate	\$996,179	1.01	<b>\$1,016,138</b>
2013 Cost Estimate x 1.030 = 2012 Cost Estimate	\$1,016,138	1.02	<b>\$1,036,098</b>

**201' TOTAL CLOSURE DECONTAMINATION COST ESTIMATE                      \$1,036,098**

NOTE: This cost estimate includes the costs for used oil and solid waste.

In the most recent year: Used oil (964,991) + Solid Waste (71,107) = Total (1,036,098)

Cost Estimate is based upon removal of inventory and the decontamination of the facility to a safe clean condition suitable for further ordinary business usage of the facility or disposition of the facility through ordinary bankruptcy proceedings.

The Cost Estimate does not include demolition of any tanks or structures to a greenfield condition.





# Florida Department of Environmental Protection

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

SOLID WASTE  
SECTION

FEB 19 2013

Print Form

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: Feb 4, 2013

Date of DEP Approval: Feb 21, 2013

I. GENERAL INFORMATION: Latitude: 27.9869 Longitude: -82.1236 EPA ID Number: <sup>FLD</sup> 065 680 613 ✓

Facility Name: FCC Environmental, LLC Permit Number: 30676 HO 005 ✓

Facility Address: 105 S. Alexander Street, Plant City, FL 33563

Mailing Address: Same as above

Contact Person's Name: Angelo Pousa

Phone Number: 813-754-1504

Fax Number: 813-754-3789

Email: angelo.pousa@fccenvironmental.com

### II. TYPE OF FINANCIAL ASSURANCE DOCUMENT (Check Type)

☒ 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: 01/01/2013

946,070 ✓ x 1.020 = 964,991 ✓  
Latest DEP approved Closing Cost Estimate Current Year Inflation Factor Inflation Adjusted Annual Closing Cost Estimate

Signature: [Signature] Phone: 410-284-1717 x 236

Name and Title: Vinnie Glorioso, EHS Manager E-Mail: Vinnie.Glorioso@fccenvironmental.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





# Florida Department of Environmental Protection

Southwest District  
13051 North Telecom Parkway  
Temple Terrace, Florida 33637-0926  
Telephone: 813-632-7600

Rick Scott  
Governor

Herschel T. Vinyard Jr.  
Secretary

Transmitted via email only to

[Vinnie.glorioso@fccenvironmental.com](mailto:Vinnie.glorioso@fccenvironmental.com)

Mr. Vinnie Glorioso, Env. Health and Safety Manager  
FCC Environmental, LLC  
105 South Alexander Street  
Plant City, FL 33563

May 3, 2013

Re: FCC Environmental, LLC Waste Processing Facility  
Financial Assurance Cost Estimates  
Permit No. 137964-006-SO/30, Hillsborough County  
WACS #: 42485

Dear Mr. Glorioso:

This letter is to acknowledge receipt of the inflation-adjusted cost estimates dated January 10, 2012 (received January 12, 2012), for closing the Hydrocarbon Recovery Services, Inc. Waste Processing Facility. The cost estimates received January 12, 2012 (total for closure \$71,107.26), are **APPROVED for 2013.** The approved estimates are for the maximum quantities of materials and closure activities provided in the Estimated Solid Waste Management Area Closure Costs – 2009 Dollars table in Attachment 5. The next annual update (revised or inflation-adjusted estimates) is due no later than **March 1, 2014.**

A copy of these estimates will be forwarded to Financial Coordinator, Solid Waste Section, FDEP, 2600 Blair Stone Road, MS 4565, Tallahassee, Florida 32399-2400. Please work with him directly to assess the facility's compliance with the funding mechanism requirements of Rule 62-701.630, F.A.C. If you have any questions, you may contact me at (813) 632-7600 ext. 385.

Sincerely,

Nancy D. Gaskin  
Solid Waste Section  
Southwest District

ndg

Cc: Ron Cope, HCEPC (e-mail)  
Solid Waste Financial Coordinator, FDEP Tallahassee, [Solid.Waste.Financial.Coordinator@dep.state.fl.us](mailto:Solid.Waste.Financial.Coordinator@dep.state.fl.us)  
Susan Pelz, FDEP Tampa (e-mail)

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**FCC ENVIRONMENTAL, LLC  
PLANT CITY, FLORIDA  
ATTACHMENT 9  
EMPLOYEE TRAINING**

A schedule of FCC's training is included as part of this attachment. This spreadsheet lists every employee, along with the dates they received various types of training. The type of training an individual receives is directly related to their defined job responsibilities. The various types of training available to Plant City personnel are Used Oil Transportation, Personal Protective Equipment, and HAZCOM training.

# Plant City 2012 Training Matrix

Name	Position	Used Oil Florida	Hazcom	Pers Prot Eqt	Notes
Jeff Andrews	Maintenance	7/13/2012	1/25/2012	2/22/2012	
Eddie Dennett	Plant Operations		1/25/2012	2/22/2012	
Chris Bowers	Oil Collections	7/13/2012	1/25/2012	2/22/2012	
Jason Bowers	Filter Plant	7/13/2012	1/25/2012	2/22/2012	
David Branch	Plant Operator		1/25/2012	2/22/2012	
William Bridges	Plant Operator	7/13/2012	1/25/2012	2/22/2012	
Eric Cellabos	Sales		1/25/2012	2/22/2012	
Larry Davis	Oil Exchange		1/25/2012	2/22/2012	
Jesse Giddens	Plant Operator		1/25/2012	2/22/2012	
Mike Bisson	Transport Mgr		1/25/2012	2/22/2012	
Joanne Wright	Administration		1/25/2012	2/22/2012	
James Marterson	Box Truck	7/13/2012	1/25/2012	2/22/2012	
Beth Mobley	Administration		1/25/2012	2/22/2012	
Joshua Morales	Field Services		1/25/2012	2/22/2012	
Steven Nash	Field Services		1/25/2012	2/22/2012	
James Phillips	Oil Collections	7/13/2012	1/25/2012	2/22/2012	
Alton Goldon	Box Truck	7/13/2012	1/25/2012	2/22/2012	
Larry Rypkema	Oil Exchange		1/25/2012	2/22/2012	
Ana Saldana	Lab Tech		1/25/2012	2/22/2012	
Eugene Sciulli	Sales		1/25/2012	2/22/2012	
Denise Smith	Administration		1/25/2012	2/22/2012	
Alvin Mathis	Field Services		1/25/2012	2/22/2012	
Alan Stinson	Field Services		1/25/2012	2/22/2012	
Terry Sumner	Oil Exchange	7/13/2012	1/25/2012	2/22/2012	
Jesus Moran	Box Truck	7/13/2012	1/25/2012	2/22/2012	
Nick Tortorici	Oil Collections	7/13/2012	1/25/2012	2/22/2012	
Lucretia Trim	Administration		1/25/2012	2/22/2012	
Jesus Valencia	Plant Operator	7/13/2012	1/25/2012	2/22/2012	
Michael Chason	Box Truck	7/13/2012	1/25/2012	2/22/2012	
Angelo Pousa	Area Manager				
Tommy Skirvin	Field Services		1/25/2012	2/22/2012	Employee transfer
Kimberly Cruz	Administration		1/25/2012	2/22/2012	Employee resigned
Elaine Felts	Temporary		1/25/2012	2/22/2012	Temp released
John Sumner	Temporary		1/25/2012	2/22/2012	Temp released
Deborah Dowd	Sales				Hired later in 2012
Wally Andrus	Utility Driver				Hired later in 2012
Tammi Cullifer	Temporary		1/25/2012	2/22/2012	Temp released
Jeremy Copeland	Oil Collections	7/13/2012	1/25/2012	2/22/2012	Employee released
James Kennedy	Oil Exchange	7/13/2012	1/25/2012	2/22/2012	Employee resigned
Richard LeFan	Oil Collections	7/13/2012	1/25/2012	2/22/2012	Employee released
Heather Tomlinson	Temporary		1/25/2012	2/22/2012	Temp released



## Safety Meeting Report ☐

Location: PLANT CITY

Subjects: HAZ- COM PROGRAM

Instructor: ANGELO FOUSA

## Safety Training Report ☐

Date: 1-25-2012

Time: 7:00 AM, 8:00 AM, 4:00 PM

Hours: 1 EACH

PRINT NAME	SIGNATURE	
1. Alan Stinson	Alan Stinson	<u>SAFETY TOPICS DISCUSSED</u> HAZ-COM PROGRAM MOBILE ABOVE POLICY COMING FROM OFFICE ACCIDENT THAT HAPPEND IN OUR POMPANO BEACH
2. Eddie Dennett	Eddie Dennett	
3. Bill BRIDGES	Bill Bridges	
4. Jesse Giddens	Jesse Giddens	
5. Nick Tortorelli	Nick 2	<u>SAFETY SUGGESTIONS</u>
6. Jesus MORAN CJ	Jesus Moran	
7. Jason Bowers	Jason Bowers	
8. Alfredo Torres	Alfredo Torres	
9. Jeff Andrews	Jeff Andrews	<u>ADDITIONAL COMMENTS</u>
10. Domingo Anellano	Domingo Anellano	
11. Michael Chason	Michael Chason	
12. Terry W. Sumner	Terry Sumner	
13. Ana Saldana	Ana S	
14. Mike Bowers	Mike Bowers	
15. Beth Mobley	Beth Mobley	
16. Tamara Cullifer	Tamara Cullifer	
17. Kim Cruz	Kim Cruz	
18. JoAnne Wright	JoAnne Wright	
19. Katie Trim	Katie Trim	
20. Elaine Felts	Elaine Felts	
21. Heather Tomlinson	Heather Tomlinson	
22. Denise Smith	Denise Smith	
23. Richard LeFay	Richard LeFay	
24. Tommy Skirvin	Tommy Skirvin	



## Safety Meeting Report ☐

Location: PLANT CITY

Subjects: HAZ-COM PROGRAM

Instructor: ANGELO PASA

## Safety Training Report ☐

Date: 1-25-2012

Time: 7:00 AM - 8:00 AM - 4:00 PM

Hours: 1 EACH

PRINT NAME	SIGNATURE	<u>SAFETY TOPICS DISCUSSED</u>
1. JAMES KENNEDY		<u>HAZ-COM PROGRAM</u> MOBILE PHONE POLICY COMING FROM FCC ACCIDENT THAT HAPPENED IN ARNOLD
2. JESUS VALENCIA	J-V	
3. LARRY EDWARDS		
4. James Phillips		
5. James Marterson		
6. Jeremy Copeland		
7. Alton Golden		
8. DAVE BRUCH		
9. Nick		
10. Steven Nash		
11. Alvin Mathis		
12. JOSHUA MORRIS		
13.		<u>SAFETY SUGGESTIONS</u>
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## Safety Meeting Report ☐

Location: Plant City

Subjects: HAZ-CAN PROGRAM

Instructor: Angelo Posa

## Safety Training Report ☐

Date: 1-25-2012

Time: 4:00 PM

Hours: 1

PRINT NAME	SIGNATURE	<u>SAFETY TOPICS DISCUSSED</u>
1. Eugene G. Sciulli	E G Sciulli III TS2	
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SAFETY SUGGESTIONS

ADDITIONAL COMMENTS



## Safety Meeting Report ☐

Location: PLANT CITY

Subjects: ITAZ- COM


Instructor: ANGELO POUSA

## Safety Training Report ☐

Date: 1-25-2012

Time: 4:00 PM

Hours: 1

PRINT NAME	SIGNATURE	<u>SAFETY TOPICS DISCUSSED</u>
1. ERIC CERILLOS		
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SAFETY SUGGESTIONS

ADDITIONAL COMMENTS



## Safety Meeting Report ☐

Location: PLANT CITY FL

Subjects: FORKLIFT TRAINING

Instructor: ANGELO POUSA

## Safety Training Report ☐

Date: 1-20-2012

Time: 10:00 AM / 3:00 PM

Hours: 1.5

PRINT NAME	SIGNATURE	<u>SAFETY TOPICS DISCUSSED</u>
1. Bill BRIDGES		
2. Eddie Dennett		
3. Alfredo Torres		
4. Jeff Andrews		<u>SAFETY SUGGESTIONS</u>
5. JASON BOWERS		
6. Mike R...		
7. Domingo Ant...		
8. DAVE BRANCH		
9. JESUS VALENTA		
10. Jesse Giddens		<u>ADDITIONAL COMMENTS</u>
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## Safety Meeting Report ☐

Location: PLANT CITY FL

Subjects: WASTE ACCEPTANCE PLAN/ SPCC TRAINING

Instructor: ANGELO POUSA

## Safety Training Report ☐

Date: 2-28-2012/

Time: 2:00 PM

Hours: 3.5

PRINT NAME	SIGNATURE	<u>SAFETY TOPICS DISCUSSED</u>
1. Bill BRIDGES	Bill Bridges	
2. JESUS VALENCIA	J-V	
3. Jesse Giddens	Jesse Giddens	
4. Jeff Andrews	Jeff Andrews	
5. Domingo Arellano	Domingo Arellano	
6. Jason Bawans	Jason Bawans	
7. Dale Branch	Dale Branch	
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SAFETY SUGGESTIONS

ADDITIONAL COMMENTS



## Safety Meeting Report ☐

Location: PLANT CITY FL.

Subjects: PPE

Instructor: ANGELO POUSA

## Safety Training Report ☐

Date: 2-22-2012

Time: 7:00 AM + 4:00 PM

Hours: 1

PRINT NAME	SIGNATURE	SAFETY TOPICS DISCUSSED
1. Jesus Monahan ✓	[Signature]	1. TRAY SUMMONS NEAR MISS
2. James Phillips ✓	[Signature]	2. SERVICE ORDER SIGNATURE + INFO PRINT SIGN # SCHEDULED STOPS #
3. Jason Bowers ✓	[Signature]	3. PPE
4. Jeremy Copeland ✓	[Signature]	<u>SAFETY SUGGESTIONS</u>
5. Alan Stinson ✓	[Signature]	
6. Mike Bowers ✓	[Signature]	
7. Jesse Giddens ✓	[Signature]	
8. Eddie Darnett ✓	[Signature]	
9. Bill BRIDGES ✓	[Signature]	
10. Joshua March ✓	[Signature]	
11. Larry Rypkema ✓	[Signature]	
12. Jeff Andrews ✓	[Signature]	<u>ADDITIONAL COMMENTS</u>
13. Domingo Arellano ✓	[Signature]	
14. Nick Tartaric ✓	[Signature]	
15. Alfredo Torres ✓	[Signature]	
16. Michael Chason	[Signature]	
17. Ana S. ✓	[Signature]	
18. Richard Letan ✓	[Signature]	
19. Jesus VALENIA	[Signature]	
20. DAVE BRANCH ✓	[Signature]	
21. Mike Bisson ✓	[Signature]	
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## Safety Meeting Report ☐

Location: PLANT CITY FL.

Subjects: PPE

Instructor: ANGELO POUSA

## Safety Training Report ☐

Date: 2-23-2012

Time: 7:00 AM + 4:00 PM

Hours: 1

PRINT NAME	SIGNATURE	
1. Alvin Mathis ✓	[Signature]	<u>SAFETY TOPICS DISCUSSED</u> 1- SERVICE ORDER SIGNATURES 2- PPE
2. Terry W. Sumner ✓	[Signature]	
3. James Kennedy ✓	[Signature]	<u>SAFETY SUGGESTIONS</u>
4. Larry Davis ✓	[Signature]	
5. Steven Nash ✓	[Signature]	<u>ADDITIONAL COMMENTS</u>
6. Alton Golden ✓	[Signature]	
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## Safety Meeting Report ☐

## Safety Training Report ☐

Location: PLANT CITY FL

Date: 3-27-2012

Subjects: LOCK OUT TAG OUT / FIELD SAMPLING CLOSED QUINS Time: 7:00 AM

Instructor: ANGELO POUSSA

Hours: 1.5

PRINT NAME	SIGNATURE	SAFETY TOPICS DISCUSSED
1. Alton Golden		LOCK OUT TAG OUT AP. FIELD SAMPLING CLOSED DRUMS
2. Jeff Andrews		
3. Jesse Giddens		SAFETY SUGGESTIONS
4. Bill BRIDGES		
5. James Phillips		ADDITIONAL COMMENTS
6. Mike Bisson		
7. Alan Stinson		
8. Krister Danvers		
9. Larry Rypkema		
10. Rueland LeFau		
11. Larry Edwards		
12. Joseph Marden		
13. Terry Sumner		
14. Alvin		
15. Alfredo		
16. Jason Bowers		
17. Vick Tortorello		
18. Steven Nash		
19. James Bennett		
20. Michael Chasen		
21. Jeremy Copeland		
22. Dominic Alvaro		
23. Jesus Moea		
24. James Martenson		



## Safety Meeting Report ☐

Location: PLANT CITY FL

Subjects: LOCK OUT TAG OUT / FIELD SAMPLING CLOSED Dumps Time: 7:00 AM + 4:00 PM  
FOR SOME EMPLOYEES


Instructor: ANGELO ROUSA

# Safety Training Report ☐

Date: 3-27-2012

Time: 7:00 AM + 4:00 PM

Hours: 1.5

PRINT NAME	SIGNATURE	SAFETY TOPICS DISCUSSED
1. Jo Anne Wright		LOCK OUT TAG OUT FIELD SAMPLING CLOSED DRUMS FOR NON-ADMIN EMPLOYEES
2. Heather Tomlinson		
3. Elaine Felts		
4. Tami Cullifer		<u>SAFETY SUGGESTIONS</u>
5. Jodie Trum		
6. Denise Smith		
7. Ana Soudana		<u>ADDITIONAL COMMENTS</u>
8. JESUS VALENCIA	J-V	
9. DAVE BRANCH	DB	
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## Safety Meeting Report ☐

Location: Plant City FL

Subjects: Lock Out / Tag Out

Instructor: Angelo Pousa

## Safety Training Report ☐

Date: 3/26/12

Time: 7:00 AM

Hours: 1.5

PRINT NAME	SIGNATURE	
1. Bath Mobley	Bath Mobley	<u>SAFETY TOPICS DISCUSSED</u> LOCK OUT TAG OUT
2. Kimberly Cruz	Kimberly Cruz	
3.		
4.		<u>SAFETY SUGGESTIONS</u>
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14.		<u>ADDITIONAL COMMENTS</u>
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# Safety Training Report ☐

Date: 4-24-2012

**Time:** 7:00 AM - 4:00 PM

Hours: 1.5

PRINT NAME	SIGNATURE	SAFETY TOPICS DISCUSSED
1. Nick Tortorelli	Nick Tortorelli	FLEET SAFETY MANUAL
2. James Phillips	James Phillips	INTERSECTION SAFETY
3. Steven Nash	Steven Nash	SMIFFERS LOG
4. Jeff Andrew	Jeff Andrew	DEXEL RITS
5. C. J. Moran	C. J. Moran	
6. Richard Lefran	Richard Lefran	
7. Domingo Anellano	Domingo Anellano	
8. Alton Golden	Alton Golden	
9. Michael Chudron	Michael Chudron	
10. Alan Stinson	Alan Stinson	
11. Bob Bowers	Bob Bowers	
12. Terry W. Sumner	Terry W. Sumner	
13. Larry Ruppema	Larry Ruppema	
14. Larry Davis	Larry Davis	
15. Bill BRIDGES	Bill Bridges	
16. Jesse Giddens	Jesse Giddens	
17. Catalie Duncanson	Catalie Duncanson	
18. Jason Bowers	Jason Bowers	
19. A. Piotrowski	A. Piotrowski	
20. JAMES Kennedy	JAMES Kennedy	
21. Jeremy Copeland	Jeremy Copeland	
22. Mike Bisson	Mike Bisson	
23. ANAS	ANAS	
24. James Markerson	James Markerson	

**SAFETY SUGGESTIONS**

**ADDITIONAL COMMENTS**



## Safety Meeting Report ☐

Location: PLANT CITY FL

Subjects: FLEET SAFETY MANUAL +

Instructor: ANGELO POUSA

## Safety Training Report ☐

Date: 4-24-2012

Time: 7:00 AM + 4:00 PM

Hours: 1.5

PRINT NAME	SIGNATURE	
1. Kimberly Cruz		<u>SAFETY TOPICS DISCUSSED</u> FLEET SAFETY INTERSECTION SAFETY
2. TAMARA J. Cullifer		
3. Beth Mobley		<u>SAFETY SUGGESTIONS</u>
4. Denise Smith		
5. JoAnne Wright		<u>ADDITIONAL COMMENTS</u>
6. Elaine Fells		
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# Safety Meeting Report ☐

Location: PLANT CITY FL

Subjects: FLEET STAFFORY MANUAL +

**Instructor:**

# Safety Training Report ☐

**Date:** 4-24-2012

**Time:** 4:00 PM

Hours: 1.5

PRINT NAME	SIGNATURE
1. DAVE BRINCH	[Signature]
2. JESUS VALENCIA	J-V
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**SAFETY TOPICS DISCUSSED**

FIRST SAFETY MANUAL  
INTERSECTION SAFETY

**SAFETY SUGGESTIONS**

**ADDITIONAL COMMENTS**

### Training Record and Certification

Company/Corporation: FCC Environmental  
Address: City Plant City State FL Zip 33563  
Employee Name: First Jenny Last COPELAND Middle \_\_\_\_\_  
Employee ID Number: 1856  
Position Description: Oil Collections

### TRAINING REGULATIONS

49 CFR 172.700 Purpose and Scope  
49 CFR 172.702 Applicability and Responsibility for Training and Testing  
49 CFR 172.704 Training Requirements

49 CFR 172.704 (a) Hazmat employees training shall include:

- (1) General awareness/familiarization training
- (2) Function Specific training
- (3) Safety training
- (4) Security awareness training
- (5) In-depth security training

#### 49 CFR 172.704 (d) RECORDKEEPING

(a) Most recent training completion date inclusive of the preceding three years of the hazmat employee's training. Training at least once every three years

Previous Date \_\_\_\_\_ Current Date 5/9/12

(b) A description, copy or the location of the training materials used to meet training requirements. \_\_\_\_\_

(c) Name and address of person providing training

Name: \_\_\_\_\_

Address: \_\_\_\_\_

(d) Certification that the hazmat employee has been trained and tested

Test date: \_\_\_\_\_

(e) Certification from Instructor:

This is to certify that the above named employee has been trained and tested in accordance with DOT 49 CFR 172.700 thru 172.704: Signature \_\_\_\_\_

**This is not a mandatory FEDERAL RAILROAD ADMINISTRATION FORM, but may be used to comply with the training regulations.**

### Training Record and Certification

Company/Corporation: FCC  
Address: City Plant City State FL. Zip \_\_\_\_\_  
Employee Name: First Nick Last Tortorici Middle Phillip  
Employee ID Number: 272-563  
Position Description: Oil Collection Driver

### TRAINING REGULATIONS

**49 CFR 172.700** Purpose and Scope  
**49 CFR 172.702** Applicability and Responsibility for Training and Testing  
**49 CFR 172.704** Training Requirements

**49 CFR 172.704 (a)** Hazmat employees training shall include:

- (1) General awareness/familiarization training
- (2) Function Specific training
- (3) Safety training
- (4) Security awareness training
- (5) In-depth security training

### **49 CFR 172.704 (d) RECORDKEEPING**

(a) Most recent training completion date inclusive of the preceding three years of the hazmat employee's training. Training at least once every three years

Previous Date \_\_\_\_\_ Current Date 5-9-12

(b) A description, copy or the location of the training materials used to meet training requirements. \_\_\_\_\_

(c) Name and address of person providing training

Name: \_\_\_\_\_

Address: \_\_\_\_\_

(d) Certification that the hazmat employee has been trained and tested

Test date: \_\_\_\_\_

(e) Certification from Instructor:

This is to certify that the above named employee has been trained and tested in accordance with DOT 49 CFR 172.700 thru 172.704: Signature \_\_\_\_\_

**This is not a mandatory FEDERAL RAILROAD ADMINISTRATION FORM, but may be used to comply with the training regulations.**

**Training Record and Certification**

Company/Corporation: F.C.C. Environmental  
Address: City Plant City State FL Zip 33556  
Employee Name: First James Last Phillips Middle Michael  
Employee ID Number: 307643  
Position Description: Oil Collections

**TRAINING REGULATIONS**

49 CFR 172.700 Purpose and Scope  
49 CFR 172.702 Applicability and Responsibility for Training and Testing  
49 CFR 172.704 Training Requirements

49 CFR 172.704 (a) Hazmat employees training shall include:

- (1) General awareness/familiarization training
- (2) Function Specific training
- (3) Safety training
- (4) Security awareness training
- (5) In-depth security training

**49 CFR 172.704 (d) RECORDKEEPING**

(a) Most recent training completion date inclusive of the preceding three years of the hazmat employee's training. Training at least once every three years

Previous Date \_\_\_\_\_ Current Date 5-9-18

(b) A description, copy or the location of the training materials used to meet training requirements. \_\_\_\_\_

(c) Name and address of person providing training

Name: \_\_\_\_\_

Address: \_\_\_\_\_

(d) Certification that the hazmat employee has been trained and tested

Test date: \_\_\_\_\_

(e) Certification from Instructor:

This is to certify that the above named employee has been trained and tested in accordance with DOT 49 CFR 172.700 thru 172.704: Signature \_\_\_\_\_

**This is not a mandatory FEDERAL RAILROAD ADMINISTRATION FORM, but may be used to comply with the training regulations.**

### Training Record and Certification

Company/Corporation: FCC  
Address: City Plant City State FL Zip 33563  
Employee Name: First Michael Last Chason Middle Edwards  
Employee ID Number: 001040  
Position Description: Utility

### TRAINING REGULATIONS

49 CFR 172.700 Purpose and Scope

49 CFR 172.702 Applicability and Responsibility for Training and Testing

49 CFR 172.704 Training Requirements

49 CFR 172.704 (a) Hazmat employees training shall include:

- (1) General awareness/familiarization training
- (2) Function Specific training
- (3) Safety training
- (4) Security awareness training
- (5) In-depth security training

#### 49 CFR 172.704 (d) RECORDKEEPING

(a) Most recent training completion date inclusive of the preceding three years of the hazmat employee's training. Training at least once every three years

Previous Date \_\_\_\_\_ Current Date 5-8-2012

(b) A description, copy or the location of the training materials used to meet training requirements. \_\_\_\_\_

(c) Name and address of person providing training

Name: \_\_\_\_\_

Address: \_\_\_\_\_

(d) Certification that the hazmat employee has been trained and tested

Test date: \_\_\_\_\_

(e) Certification from Instructor:

This is to certify that the above named employee has been trained and tested in accordance with DOT 49 CFR 172.700 thru 172.704: Signature \_\_\_\_\_

**This is not a mandatory FEDERAL RAILROAD ADMINISTRATION FORM, but may be used to comply with the training regulations.**

**Training Record and Certification**

Company/Corporation: FCC Environmental  
Address: City Plant City State FL. Zip 33563  
Employee Name: First Terry Last Sumner Middle Wayne  
Employee ID Number: 000692  
Position Description: Utility Driver

**TRAINING REGULATIONS**

**49 CFR 172.700** Purpose and Scope  
**49 CFR 172.702** Applicability and Responsibility for Training and Testing  
**49 CFR 172.704** Training Requirements

**49 CFR 172.704 (a)** Hazmat employees training shall include:

- (1) General awareness/familiarization training
- (2) Function Specific training
- (3) Safety training
- (4) Security awareness training
- (5) In-depth security training

**49 CFR 172.704 (d) RECORDKEEPING**

(a) Most recent training completion date inclusive of the preceding three years of the hazmat employee's training. Training at least once every three years

Previous Date \_\_\_\_\_ Current Date 5/9/2012

(b) A description, copy or the location of the training materials used to meet training requirements. \_\_\_\_\_

(c) Name and address of person providing training

Name: \_\_\_\_\_

Address: \_\_\_\_\_

(d) Certification that the hazmat employee has been trained and tested

Test date: \_\_\_\_\_

(e) Certification from Instructor:

This is to certify that the above named employee has been trained and tested in accordance with DOT 49 CFR 172.700 thru 172.704: Signature \_\_\_\_\_

**This is not a mandatory FEDERAL RAILROAD ADMINISTRATION FORM, but may be used to comply with the training regulations.**

**Training Record and Certification**

Company/Corporation: FCC Environmental  
Address: City Plant City State Fla Zip 33563  
Employee Name: First Christopher Last Bowers Middle m  
Employee ID Number: 690704  
Position Description: CSR Driver

**TRAINING REGULATIONS**

**49 CFR 172.700** Purpose and Scope  
**49 CFR 172.702** Applicability and Responsibility for Training and Testing  
**49 CFR 172.704** Training Requirements

**49 CFR 172.704 (a)** Hazmat employees training shall include:

- (1) General awareness/familiarization training
- (2) Function Specific training
- (3) Safety training
- (4) Security awareness training
- (5) In-depth security training

**49 CFR 172.704 (d) RECORDKEEPING**

(a) Most recent training completion date inclusive of the preceding three years of the hazmat employee's training. Training at least once every three years

Previous Date \_\_\_\_\_ Current Date 5-09-2012

(b) A description, copy or the location of the training materials used to meet training requirements. \_\_\_\_\_

(c) Name and address of person providing training

Name: \_\_\_\_\_

Address: \_\_\_\_\_

(d) Certification that the hazmat employee has been trained and tested

Test date: \_\_\_\_\_

(e) Certification from Instructor:

This is to certify that the above named employee has been trained and tested in accordance with DOT 49 CFR 172.700 thru 172.704: Signature \_\_\_\_\_

**This is not a mandatory FEDERAL RAILROAD ADMINISTRATION FORM, but may be used to comply with the training regulations.**

**Training Record and Certification**

Company/Corporation: FCC Enclaves, 105 S. Alexander St  
Address: City PLANT CITY State FL Zip 33563  
Employee Name: First Tom Last LEFAN Middle Richard  
Employee ID Number: 000783  
Position Description: CSR

**TRAINING REGULATIONS**

49 CFR 172.700 Purpose and Scope  
49 CFR 172.702 Applicability and Responsibility for Training and Testing  
49 CFR 172.704 Training Requirements

49 CFR 172.704 (a) Hazmat employees training shall include:

- (1) General awareness/familiarization training
- (2) Function Specific training
- (3) Safety training
- (4) Security awareness training
- (5) In-depth security training

**49 CFR 172.704 (d) RECORDKEEPING**

(a) Most recent training completion date inclusive of the preceding three years of the hazmat employee's training. Training at least once every three years.

Previous Date \_\_\_\_\_ Current Date 5-9-12

(b) A description, copy or the location of the training materials used to meet training requirements. \_\_\_\_\_

(c) Name and address of person providing training

Name: \_\_\_\_\_

Address: \_\_\_\_\_

(d) Certification that the hazmat employee has been trained and tested

Test date: \_\_\_\_\_

(e) Certification from Instructor:

This is to certify that the above named employee has been trained and tested in accordance with DOT 49 CFR 172.700 thru 172.704: Signature \_\_\_\_\_

**This is not a mandatory FEDERAL RAILROAD ADMINISTRATION FORM, but may be used to comply with the training regulations.**



# FCC Environmental, LLC

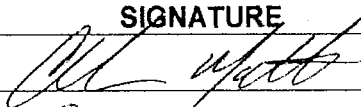

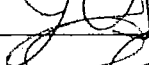


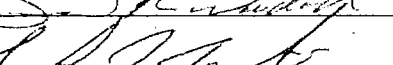
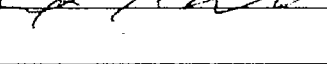
## CLASS SIGN-IN SHEET

INSTRUCTOR: John Goelz

DATE: June 9, 2012

### COURSE SELECTION:

HAZMAT Orientation	XX	Confined Space ENTRY Per 29CFR 1910.146
	XX	Confined Space ENTRY & RESCUE Per 29CFR 1910.146
40 HR. HAZWOPER 29CFR 1910.120		
8 HR. HAZWOPER Supervisor Per 29CFR 1910.120	XX	OTHER-Blood Born Pathogen
First Aid		
CPR		

PERSONNEL (Please Print)	SIGNATURE				
Alvin Mathis		6-9-12			
Steven Nash		6-9-12			
Jeff Andrews					
Ismael Vazquez		6-9-12			
Joshua Morales		6-9-12			
Scott Woodward		6-9-12			
Anthony Prociowski		6-9-12			



## Safety Meeting Report ☐

Location: PLANT CITY FC

Subjects: BLOOD BORNE PATHOGENS

Instructor: ANGELO POUSSA

## Safety Training Report ☐

7-5-2012

Date: 7-2-2012 / FOR JUNE

7-12-2012 OUT SICK 6-29-12

Time: 8:00AM

Hours: (1)

PRINT NAME	SIGNATURE	SAFETY TOPICS DISCUSSED
1. Ana Saldana ✓	Ana S	
2. Deborah Dowd ✓	Deborah Dowd	
3. Eddie Dennett ✓	Eddie Dennett	
4. Domingo Arellano	Domingo Arellano	
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7-12-12

SAFETY SUGGESTIONS

ADDITIONAL COMMENTS



## Safety Meeting Report ☐

Location: PLANT CITY FL

Subjects: ☒ BLOOD BORNE PATHOGENS

Instructor: ANGELO FOUSA

## Safety Training Report ☐

Date: 6-29-2012

Time: 9:00 AM

Hours: (1)

PRINT NAME	SIGNATURE	<u>SAFETY TOPICS DISCUSSED</u>
1. Kimberly Cruz ✓	<i>Kimberly Cruz</i>	
2. Beth W. Mabley ✓	<i>Beth W. Mabley</i>	<u>SAFETY SUGGESTIONS</u>
3. Denise Smith ✓	<i>Denise Smith</i>	
4. Katie Train ✓	<i>Katie Train</i>	<u>ADDITIONAL COMMENTS</u>
5. Tami Cunniff ✓	<i>Tami Cunniff</i>	
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## Safety Meeting Report ☐

Location: PLANT CITY FL

Subjects: BLOOD BORNE PATHOGENS

Instructor: ANGELO POUSA

## Safety Training Report ☐

Date: 6-29-2012

Time: 7:00 AM 8:00 AM 4:00 PM

Hours: 1<sup>st</sup>

PRINT NAME	SIGNATURE	
1. Alton Gordon ✓	<i>Alton Gordon</i>	<u>SAFETY TOPICS DISCUSSED</u> SAFETY SUGGESTION BOX NEAR MISS WITH BACK HOLE LARRY RYPKEMA NEAR MISS BBP AWARENESS
2. Terry Sumner ✓	<i>Terry Sumner</i>	
3. Larry Dancy ✓	<i>Larry Dancy</i>	
4. Alan Johnson	<i>Alan Johnson</i>	
5. Bill Bridges ✓	<i>Bill Bridges</i>	<u>SAFETY SUGGESTIONS</u>
6. Mike Chason ✓	<i>Mike Chason</i>	
7. Mike Reeves ✓	<i>Mike Reeves</i>	<u>ADDITIONAL COMMENTS</u>
8. James Phillips ✓	<i>James Phillips</i>	
9. Jesse Giddens ✓	<i>Jesse Giddens</i>	
10. Joshua Murden ✓	<i>Joshua Murden</i>	
11. James Marterson ✓	<i>James Marterson</i>	
12. Jeremy Copeland ✓	<i>Jeremy Copeland</i>	
13. Jesus Morales CT ✓	<i>Jesus Morales</i>	
14. Scott Ward	<i>Scott Ward</i>	
15. Jason Bowers ✓	<i>Jason Bowers</i>	
16. Mike Bisson ✓	<i>Mike Bisson</i>	
17. LARRY RYPKEMA ✓	<i>LARRY</i>	
18. JESUS VALENCIA	<i>J-V</i>	
19. Nick Tostawu ✓	<i>Nick</i>	
20. JAMES KENNEDY ✓	<i>James Kennedy</i>	
21. DAVE BRANCH ✓	<i>Dave Branch</i>	
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## Safety Meeting Report ☐

Location: PLANT CITY FL.

Subjects: EAP DRILL/FIRE PROTECTION PLAN

Instructor: ANGELO POUSA

## Safety Training Report ☐

Date: 9-11-2012

Time: 12:00 PM

Hours: 1.30 MIN

PRINT NAME	SIGNATURE	<u>SAFETY TOPICS DISCUSSED</u> PERFORM EAP DRILL GATHER ALL EMPLOYEES AT GATHERING POINT GO OVER THE ACTION PLAN POINTS. THE Q + A <u>SAFETY SUGGESTIONS</u>  <u>ADDITIONAL COMMENTS</u>
1. Bill Bridges	[Signature]	
2. Domingo Arellano	[Signature]	
3. Justin Beaus	[Signature]	
4. [Signature]	[Signature]	
5. Danny Stephens	[Signature]	
6. Tom Burdick	[Signature]	
7. Kane Wright	[Signature]	
8. Kimberly Cruz	[Signature]	
9. Tony Piotrowski	[Signature]	
10. Jeff Andrews	[Signature]	
11. Ana Saldana	[Signature]	
12. Katie Tim	[Signature]	
13. Eddie Danner	[Signature]	
14. Kammie L'ulley	[Signature]	
15. Beth Mobley	[Signature]	
16. Mike Bisson	[Signature]	
17. Dennis Evans	[Signature]	
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## Safety Meeting Report ☐

Location: PLANT CITY FL

Subjects: 5-STAR DRIVER TRAINING

Instructor: ANGELO PUGH

## Safety Training Report ☐

Date: 7-27-2012 / 7-30-2012

Time: 7:00 AM 4:00 PM

Hours: 2.5

PRINT NAME	SIGNATURE	SAFETY TOPICS DISCUSSED
1. Alton Golden ✓	Alton Golden	SAFETY SUGGESTIONS
2. Alan Stinson ✓	Alan Stinson	
3. JESUS VALENCIA ✓	JV	
4. Jeff Andrews ✓	Jeff Andrews	
5. LARRY RYKEMA ✓	Larry Rykema	
6. Domingo Arellano ✓	Domingo Arellano	
7. Joshe Morde ✓	Joshe Morde	
8. Alvin Mathis ✓	Alvin Mathis	
9. Michael Chason ✓	Michael Chason	
10. Nick Testa ✓	Nick Testa	
11. Richard Lefan ✓	Richard Lefan	
12. Terry Sumner ✓	Terry Sumner	
13. Larry Davis ✓	Larry Davis	
14. James Marterson ✓	James Marterson	
15. James Phillips ✓	James Phillips	
16. Jesse Giddens ✓	Jesse Giddens	
17. Jason Bowers ✓	Jason Bowers	
18. Mike Bisson ✓	Mike Bisson	
19. JAMES/SENNETT ✓	James/Sennett	
20. Jeremy Copeland ✓	Jeremy Copeland	
21. DAVE BRANCH ✓	Dave Branch	
22. Mike Bowers ✓	Mike Bowers	
23.		
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## Safety Meeting Report ☐

Location: PLANT CITY

Subjects: FL USED OIL TRANSPORTER MANUAL

Instructor: ANGELO POUSS

## Safety Training Report ☐

Date: 7-13-2012

Time: 7:00 AM

Hours: 2.0

PRINT NAME	SIGNATURE	SAFETY TOPICS DISCUSSED
1. Nick Teytorici	<i>Nick Teytorici</i>	* FL USED OIL TRANSPORTER MANUAL
2. Michael Chason	<i>Michael Chason</i>	* STOP WORK AUTHORITY PROGRAM
3. James Phillips	<i>James Phillips</i>	LABELS ON CUSTOMER TRAILERS
4. Jason Bowers	<i>Jason Bowers</i>	* RE-CAP LARRY R. ACCIDENT
5. Mike Bowers	<i>Mike Bowers</i>	<u>SAFETY SUGGESTIONS</u>
6. Richard Le-FAN	<i>Richard Le-FAN</i>	
7. Allen Golden	<i>Allen Golden</i>	
8. Jeff Andrews	<i>Jeff Andrews</i>	
9. Terry W. Sumner	<i>Terry W. Sumner</i>	
10. JAMES HANNEY	<i>JAMES HANNEY</i>	
11. Domingo Arellano	<i>Domingo Arellano</i>	
12. Bill BRIDGES	<i>Bill Bridges</i>	<u>ADDITIONAL COMMENTS</u>
13. Jeremy Copeland	<i>Jeremy Copeland</i>	* NEW PROCEDURES FOR PLACING
14. James Martensson	<i>James Martensson</i>	DAWMS INTO TRAILER
15. Jesus MORAN	<i>Jesus MORAN</i>	ENSURE WALKING ROOM / ISLE SPACE
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# Safety Meeting Report ☐

**Location:** PLANT CITY FL

**Subjects:** STOP WORK AUTHORITY

Instructor: ANGELO ROUSA

# Safety Training Report ☐

**Date:** 7-16-2012

**Time:** 3:00 PM

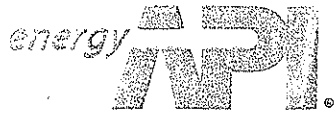
Hours: 2

PRINT NAME	SIGNATURE	SAFETY TOPICS DISCUSSED
1. JESUS VALENCIA	J-V	STOP WORK AUTHORITY (X)
2. LARRY RYKEMA	LAR	FL. USED OIL TRANSPORT (X)
3. DAVE BRANCH	Dave Branch	
4. Lanny Daun	Lanny Daun	
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SAFETY SUGGESTIONS

ADDITIONAL COMMENTS





AMERICAN PETROLEUM INSTITUTE  
INDIVIDUAL CERTIFICATION PROGRAMS

## API Individual Certification Programs

certifies that

*Drew Kenneth Frye*

has met the requirements to be a certified

*API-653 Above Ground Storage Tank Inspector*

Certification Number *23993*

Original Certification Date *October 31, 2002*

Current Certification Date *October 31, 2011*

Expiration Date *October 31, 2014*

*Tina Briskin*

Manager, Individual Certification Programs



MS 5/16/2013

Plant City, FL

not yet performed and not based upon date of manufacture  
(based upon SPCC regulation effective date)

Note: 1950 used as age for all riveted tanks.  
Note: 1990 used as age for welded tanks of uncertain age.  
(older portion of plant circa 1989)

Tank ID	Gallons	Contents	Internal	External	Thickness
1	14,700	Antifreeze	1.14.2015	10.6.2014	10.6.2024
2	14,700	Used oil	1.14.2015	10.6.2014	10.6.2024
3	15,000	Used oil	1.14.2015	10.6.2014	10.6.2024
4	15,000	Used oil	1.14.2015	10.6.2014	10.6.2024
5	15,000	Oil	1.14.2015	10.6.2014	10.6.2024
6	18,800	Oil	1.14.2015	10.6.2014	10.6.2024
7	14,100	Used oil	1.14.2015	10.6.2014	10.6.2024
8	14,100	Used oil	1.14.2015	10.6.2014	10.6.2024
9	14,700	Used oil	1.14.2015	10.6.2014	10.6.2024
10	14,700	Oil	1.14.2015	10.6.2014	10.6.2024
10k	10,000	Diesel fuel	1.14.2015	10.6.2014	10.6.2024
11	18,800	Oil	1.14.2015	10.6.2014	10.6.2024
12	24,000	Oil	1.14.2015	10.6.2014	10.6.2024
20KV	20,000	Oil	1.14.2015	10.6.2014	10.6.2024
20V	20,700	Antifreeze	1.14.2015	10.6.2014	10.6.2024
24	24,000	Oil	1.14.2015	10.6.2014	10.6.2024
30KV	30,000	Oil	1.14.2015	10.6.2014	10.6.2024
552	500,000	RFO	7.31.2016	7.31.2016	7.31.2016
630	630,000	Used oil	11.31.2029	11.31.2014	11.31.2014
C1	30,000	Oil		10.6.2014	3.6.2021
C2	30,000	Oil		10.6.2014	3.6.2021
C3	30,000	Oil		10.6.2014	3.6.2021
SKE	47,000	Oily water	1.30.2009	5.8.2018	5.8.2018
SKW	47,000	Oily water	10.30.2012	5.8.2018	5.8.2018
Towers				5.8.2028	5.8.2028
Capacity	1,612,300				

Inspections by outside contractor per FL law  
Inspections by outside contractor per FL law

Tank is unsuitable for any hazardous materials use. Water only.  
Tank is unsuitable for any hazardous materials use. Water only.

# Tank Integrity Testing Program

# FCC Environmental

Attach drawings if available

## Tank Data Sheet

Facility **Plant City, FL**

Date Completed **8/28/2007** By **Tom Burdeshaw**

Tank Identification **T # 1**

Date of Construction **1950** riveted Date of Installation **(not used in calculations)**

Material **CS** Other

Thickness lowest course/shell **0.3125**  
 (original, in floor center) **0.3125** Annular ring (if applicable) **na**  
 roof/head **0.25**

Code (mark) **NA**

Nominal Capacity (mark units) **GAL** **14,700**

Normal Contents (mark) **Used oil**

Dimensions (Height/Dia), ft. **25** **10**  
 Orientation **vert.**

Foundation type (mark) **concrete**  
 If concrete, mark ring or solid **solid**  
 elevated or ground contact **ground**  
 Double bottom or release prevention barrier? **no**

Insulation type (mark if none) **none**

Coils - describe (mark if none) **none**

### Notes on repair or modification history

	1st	sign	date	2nd	sign	date	3rd	sign	date	4th	sign
Formal external inspection	2009	Drew Frye	10/6/2009	2014			2019			2024	
Shell thickness testing	2009	Drew Frye	10/6/2009	2024			2024			#DIV/0!	
Internal inspection, floor& shell	2009			2025			2035			2040	

The below applies to API 650, API 12F, and UL 142 (only if welds not corroded) tanks.  
 Double Treq for UL 142 tanks if welds are affected.

### Roof

Year	Tmin (this test)	Tmin (last test)	time int	Corr rate	Treq cal	Treq min	Calc Intrv	Min Int	Year of next test
2009	0.23	0.25	59	0.0003	0.05	0.09	103	15	2024
2024	0.177	0.23	15	0.0035	0.05	0.09	6	15	2030
2030	0.158	0.177	6	0.0031	0.05	0.09	6	15	2036
2036	0.141	0.158	6	0.0031	0.05	0.09	4	15	2040

### Floor

Year	Tmin (this test)	Tmin (last test)	Corr rate	Treq cal	Treq min	Calc Intrv	Min Int	Year of next test
2005	0.16	0.25	55	0.0016	0.1	0.1	18	2025
2025	0.13	0.16	20	0.0015	0.1	0.1	10	2035
2035	0.115	0.13	10	0.0015	0.1	0.1	5	2040
2040	0.114	0.14	5	0.0052	0.1	0.1	1	2041

(0.05 if lined)

### Shell

Year	Tmin (this test)	Tmin (last test)	Corr rate	Treq cal	Treq min	Calc Intrv	Min Int	Year of next test
2009	0.29	0.3125	59	0.0004	0.0378	0.1	125	2024
2024	0.11	0.29	15	0.0120	0.0378	0.1	0	2024
2024	0.11	0.11	0	0.0000	0.0378	0.1	#DIV/0!	15 #DIV/0!
#DIV/0!	0.11	0.11	#DIV/0!	#DIV/0!	0.0378	0.1	#DIV/0!	15 #DIV/0!

## Tank Integrity Testing Program

## FCC Environmental

Attach drawings if available

## Tank Data Sheet

Facility Plant City, FL.

Date Completed

8/28/2007By Tom Burdeshaw

Tank Identification

T # 2

Date of Construction

1950

Date of Installation

 (not used in calculations)

Material

CSThickness lowest course/shell  
(original, in floor center)  
roof/head0.3125  
0.3125  
0.25

Annular ring (if applicable)

na

Code (mark)

na riveted

Nominal Capacity (mark units)

Gal 14,700

Normal Contents (mark)

Used oil

Dimensions (Height/Dia), ft.

25 10

Orientation

vert.

Foundation type (mark)

concreteIf concrete, mark ring or solid  
elevated or ground contactsolid  
ground

Double bottom or release prevention barrier?

no

Insulation type (mark if none)

none

Coils - describe (mark if none)

none

Notes on repair or modification history

Formal external inspection

1st  
2009

sign

date

2nd

sign

date

3rd

sign

date

4th

sign

Shell thickness testing

2009

Drew Frye

10/6/2009

2014

Internal inspection, floor &amp; shell

2009

Drew Frye

10/6/2009

20242019  
2024  
20352024  
#DIV/0!  
2040

The below applies to API 650, API 12F, and UL 142 (only if welds not corroded) tanks.

Double Treq for UL 142 tanks if welds are affected.

## Roof

Year Tmin (this test)	Tmin (last test)	time int	Corr rate	Treq cal	Treq min	Calc Intrv	Min Int	Year of next test
2009	0.23	59	0.0003	0.05	0.09	103	15	2024
2024	0.177	15	0.0035	0.05	0.09	6	15	2030
2030	0.158	6	0.0031	0.05	0.09	6	15	2036
2036	0.141	6	0.0031	0.05	0.09	4	15	2040

## Floor

Year	Tmin (this test)	Tmin (last test)	Corr rate	Treq cal	Treq min	Calc Intrv	Min Int	Year of next test	
2005	0.16	0.25	55	0.0016	0.1	0.1	18	20	2025
2025	0.13	0.16	20	0.0015	0.1	0.1	10	20	2035
2035	0.115	0.13	10	0.0015	0.1	0.1	5	20	2040
2040	0.114	0.14	5	0.0052	0.1	0.1	1	20	2041

(0.05 if lined)

## Shell

Year	Tmin (this test)	Tmin (last test)	Corr rate	Treq cal	Treq min	Calc Intrv	Min Int	Year of next test	
2009	0.23	0.3125	59	0.0014	0.0378	0.1	23	15	2024
2024	0.11	0.23	15	0.0080	0.0378	0.1	0	15	2024
2024	0.11	0.11	0	0.0000	0.0378	0.1	#DIV/0!	15	#DIV/0!
#DIV/0!	0.11	0.11	#DIV/0!	#DIV/0!	0.0378	0.1	#DIV/0!	15	#DIV/0!

# Tank Integrity Testing Program

# FCC Environmental

Attach drawings if available

## Tank Data Sheet

Facility

Date Completed  By

Tank Identification

Date of Construction  uncertain Date of Installation  (not used in calculations)

Material   
 Thickness lowest course/shell   
 (original, in floor center)   
 roof/head   
 Annular ring (if applicable)

Code (mark)

Nominal Capacity (mark units)    
 Normal Contents (mark)

Dimensions (Height/Dia), ft.    
 Orientation

Foundation type (mark)   
 If concrete, mark ring or solid   
 elevated or ground contact   
 Double bottom or release prevention barrier?

Insulation type (mark if none)   
 Coils - describe (mark if none)

### Notes on repair or modification history

	1st	sign	date	2nd	sign	date	3rd	sign	date	4th	sign
Formal external inspection	<input type="text" value="2009"/>	<input type="text" value="Drew Frye"/>	<input type="text" value="10/6/2009"/>	<input type="text" value="2014"/>			<input type="text" value="2019"/>			<input type="text" value="2024"/>	
Shell thickness testing	<input type="text" value="2009"/>	<input type="text" value="Drew Frye"/>	<input type="text" value="10/6/2009"/>	<input type="text" value="2024"/>			<input type="text" value="2024"/>			<input type="text" value="#DIV/0!"/>	
Internal inspection, floor & shell	<input type="text" value="2009"/>			<input type="text" value="2017"/>			<input type="text" value="2023"/>			<input type="text" value="2025"/>	

The below applies to API 650, API 12F, and UL 142 (only if welds not corroded) tanks.  
 Double Treq for UL 142 tanks if welds are affected.

### Roof

Year	Tmin (this test)	Tmin (last test)	time int	Corr rate	Treq cal	Treq min	Calc Intrv	Min Int	Year of next test
2009	0.23	0.25	39	0.0005	0.05	0.09	68	15	2024
2024	0.177	0.23	15	0.0035	0.05	0.09	6	15	2030
2030	0.158	0.177	6	0.0031	0.05	0.09	6	15	2036
2036	0.141	0.158	6	0.0031	0.05	0.09	4	15	2040

### Floor

Year	Tmin (this test)	Tmin (last test)	Corr rate	Treq cal	Treq min	Calc Intrv	Min Int	Year of next test	
2005	0.16	0.25	35	0.0026	0.1	0.1	12	20	2017
2017	0.13	0.16	12	0.0026	0.1	0.1	6	20	2023
2023	0.115	0.13	6	0.0026	0.1	0.1	3	20	2025
2025	0.114	0.14	3	0.0089	0.1	0.1	1	20	2026
(0.05 if lined)									

(0.05 if lined)

### Shell

Year	Tmin (this test)	Tmin (last test)	Corr rate	Treq cal	Treq min	Calc Intrv	Min Int	Year of next test	
2009	0.23	0.25	39	0.0005	0.0393	0.1	63	15	2024
2024	0.11	0.23	15	0.0080	0.0393	0.1	0	15	2024
2024	0.11	0.11	0	0.0000	0.0393	0.1	#DIV/0!	15	#DIV/0!
#DIV/0!	0.11	0.11	#DIV/0!	#DIV/0!	0.0393	0.1	#DIV/0!	15	#DIV/0!

## Tank Integrity Testing Program

## FCC Environmental

Attach drawings if available

## Tank Data Sheet

Facility **Plant City, FL.**Date Completed **8/28/2007** By **Tom Burdeshaw**Tank Identification **T # 4**Date of Construction **1970** Date of Installation  (not used in calculations)

Material **CS**

Thickness lowest course/shell **0.25**

(original, in floor center) **0.25** Annular ring (if applicable) **na**

roof/head **0.25**

Code (mark) **UL 142**Nominal Capacity (mark units) **Gal 15,000**Normal Contents (mark) **Used oil**

Dimensions (Height/Dia), ft. **26 10**

Orientation **vert.**

Foundation type (mark) **concrete**

If concrete, mark ring or solid **solid**

elevated or ground contact **ground**

Double bottom or release prevention barrier? **no**Insulation type (mark if none) **none**Coils - describe (mark if none) **none**

## Notes on repair or modification history

Long thin patch ~ 5' up. Not a repair - coil removal?

1st sign date 2nd sign date 3rd sign date 4th sign

Formal external inspection **2009** Drew Frye **4/6/2009** **2014**

Shell thickness testing **2009** Drew Frye **10/6/2009** **2024**

Internal inspection, floor & shell **2009** **2017** **2019** **2023** **2024** **#DIV/0!** **2025**

The below applies to API 650, API 12F, and UL 142 (only if welds not corroded) tanks.

Double Treq for UL 142 tanks if welds are affected.

## Roof

Year	Tmin (this test)	Tmin (last test)	time int	Corr rate	Treq cal	Treq min	Calc Intrv	Min Int	Year of next test
2009	0.23	0.25	39	0.0005	0.05	0.09	68	15	2024
2024	0.177	0.23	15	0.0035	0.05	0.09	6	15	2030
2030	0.158	0.177	6	0.0031	0.05	0.09	6	15	2036
2036	0.141	0.158	6	0.0031	0.05	0.09	4	15	2040

## Floor

Year	Tmin (this test)	Tmin (last test)	Corr rate	Treq cal	Treq min	Calc Intrv	Min Int	Year of next test
2005	0.16	0.25	35	0.0026	0.1	0.1	12	20
2017	0.13	0.16	12	0.0026	0.1	0.1	6	20
2023	0.115	0.13	6	0.0026	0.1	0.1	3	20
2025	0.114	0.14	3	0.0089	0.1	0.1	1	20

(0.05 if lined)

## Shell

Year	Tmin (this test)	Tmin (last test)	Corr rate	Treq cal	Treq min	Calc Intrv	Min Int	Year of next test
2009	0.23	0.25	39	0.0005	0.0393	0.1	63	15
2024	0.11	0.23	15	0.0080	0.0393	0.1	0	15
2024	0.11	0.11	0	0.0000	0.0393	0.1	#DIV/0!	15
#DIV/0!	0.11	0.11	#DIV/0!	#DIV/0!	0.0393	0.1	#DIV/0!	15

## Tank Integrity Testing Program

## FCC Environmental

Attach drawings if available

## Tank Data Sheet

Facility Plant City, FL

Date Completed

8/28/2007

By Tom Burdeshaw

Tank Identification

T # 5

Date of Construction

1970

Date of Installation

(not used in calculations)

Material

CS

Thickness lowest course/shell  
(original, in floor center)  
roof/head0.25  
0.25  
0.25

Annular ring (if applicable)

na

Code (mark)

UL 142

Nominal Capacity (mark units)

Gal 15,000

Normal Contents (mark)

Used oil

Dimensions (Height/Dia), ft.  
Orientation26 10  
vert.

Foundation type (mark)

concrete

If concrete, mark ring or solid  
elevated or ground contactsolid  
ground

Double bottom or release prevention barrier?

no

Insulation type (mark if none)

none

Coils - describe (mark if none)

none

Notes on repair or modification history

Long thin patch ~ 5' up. Not a repair - coil removal?

Formal external inspection

1st sign date  
2009 Drew Frye 10/6/2009

2nd 2014

sign

date

3rd 2019

sign

date

4th 2024

sign

Shell thickness testing

2009 Drew Frye 10/6/2009

2024

2024

#DIV/0!

Internal inspection, floor &amp; shell

2009

2017

2023

2025

The below applies to API 650, API 12F, and UL 142 (only if welds not corroded) tanks.

Double Treq for UL 142 tanks if welds are affected.

## Roof

Year	Tmin (this test)	Tmin (last test)	time int	Corr rate	Treq cal	Treq min	Calc Intrv	Min Int	Year of next test
2009	0.23	0.25	39	0.0005	0.05	0.09	68	15	2024
2024	0.177	0.23	15	0.0035	0.05	0.09	6	15	2030
2030	0.158	0.177	6	0.0031	0.05	0.09	6	15	2036
2036	0.141	0.158	6	0.0031	0.05	0.09	4	15	2040

## Floor

Year	Tmin (this test)	Tmin (last test)	Corr rate	Treq cal	Treq min	Calc Intrv	Min Int	Year of next test	
2005	0.16	0.25	35	0.0026	0.1	0.1	12	20	2017
2017	0.13	0.16	12	0.0026	0.1	0.1	6	20	2023
2023	0.115	0.13	6	0.0026	0.1	0.1	3	20	2025
2025	0.114	0.14	3	0.0089	0.1	0.1	1	20	2026

(0.05 if lined)

## Shell

Year	Tmin (this test)	Tmin (last test)	Corr rate	Treq cal	Treq min	Calc Intrv	Min Int	Year of next test	
2009	0.23	0.25	39	0.0005	0.0393	0.1	63	15	2024
2024	0.11	0.23	15	0.0080	0.0393	0.1	0	15	2024
2024	0.11	0.11	0	0.0000	0.0393	0.1	#DIV/0!	15	#DIV/0!
IV/0!	0.11	0.11	#DIV/0!	#DIV/0!	0.0393	0.1	#DIV/0!	15	#DIV/0!

## Tank Integrity Testing Program

## FCC Environmental

Attach drawings if available

## Tank Data Sheet

Facility Plant City, FL.

Date Completed

8/28/2007By Tom Burdeshaw

Tank Identification

T # 6

Date of Construction

1950

Date of Installation

 (not used in calculations)

Material

CSThickness lowest course/shell  
(original, in floor center)  
roof/head0.3125  
0.3125  
0.25

Annular ring (if applicable)

na

Code (mark)

na riveted

Nominal Capacity (mark units)

Gal 18,800

Normal Contents (mark)

Used oil

Dimensions (Height/Dia), ft.

32 10

Orientation

vert.

Foundation type (mark)

concreteIf concrete, mark ring or solid  
elevated or ground contactsolid  
ground

Double bottom or release prevention barrier?

no

Insulation type (mark if none)

none

Coils - describe (mark if none)

none

Notes on repair or modification history

Formal external inspection

1st

sign

date

2nd

sign

date

3rd

sign

date

4th

2009  
2009  
2009Drew Frye  
Drew Frye  
10/6/2009  
10/6/2009  
2014  
2024  
20252019  
2024  
20352024  
#DIV/0!  
2040

The below applies to API 650, API 12F, and UL 142 (only if welds not corroded) tanks.

Double Treq for UL 142 tanks if welds are affected.

## Roof

Year	Tmin (this test)	Tmin (last test)	time int	Corr rate	Treq cal	Treq min	Calc Intrv	Min Int	Year of ne:
2009	0.23	0.25	59	0.0003	0.05	0.09	103	15	2024
2024	0.177	0.23	15	0.0035	0.05	0.09	6	15	2030
2030	0.158	0.177	6	0.0031	0.05	0.09	6	15	2036
2036	0.141	0.158	6	0.0031	0.05	0.09	4	15	2040

## Floor

Year	Tmin (this test)	Tmin (last test)	Corr rate	Treq cal	Treq min	Calc Intrv	Min Int	Year of ne	
2005	0.16	0.25	55	0.0016	0.1	0.1	18	20	2025
2025	0.13	0.16	20	0.0015	0.1	0.1	10	20	2035
2035	0.115	0.13	10	0.0015	0.1	0.1	5	20	2040
2040	0.114	0.14	5	0.0052	0.1	0.1	1	20	2041

(0.05 if lined)

## Shell

Year	Tmin (this test)	Tmin (last test)	Corr rate	Treq cal	Treq min	Calc Intrv	Min Int	Year of ne
2009	0.24	0.3125	59	0.0012	0.0488	0.1	28	15 2024
2024	0.11	0.24	15	0.0087	0.0488	0.1	0	15 2024
2024	0.11	0.11	0	0.0000	0.0488	0.1	#DIV/0!	15 #DIV/0!
#DIV/0!	0.11	0.11	#DIV/0!	#DIV/0!	0.0488	0.1	#DIV/0!	15 #DIV/0!



# Tank Integrity Testing Program

# FCC Environmental

Attach drawings if available

## Tank Data Sheet

Facility **Plant City, FL.**

Date Completed **8/28/2007** By **Tom Burdeshaw**

Tank Identification **T # 7**

Date of Construction **1970** Date of Installation **(not used in calculations)**

Material **CS**  
 Thickness lowest course/shell **0.25**  
 (original, in floor center) **0.25** Annular ring (if applicable) **na**  
 roof/head **0.25**

Code (mark) **UL 142**

Nominal Capacity (mark units) **Gal 14,100**  
 Normal Contents (mark) **Used oil**

Dimensions (Height/Dia), ft. **24 10**  
 Orientation **vert.**

Foundation type (mark) **concrete**  
 If concrete, mark ring or solid **solid**  
 elevated or ground contact **ground**  
 Double bottom or release prevention barrier? **no**

Insulation type (mark if none) **none**  
 Coils - describe (mark if none) **none**

Notes on repair or modification history

	1st	sign	date	2nd	sign	date	3rd	sign	date	4th
Formal external inspection	2009	Drew Frye	10/6/2009	2014			2019			2024
Shell thickness testing	2009	Drew Frye	10/6/2009	2024			2024			#DIV/0!
Internal inspection, floor & shell	2009			2017			2023			2025

The below applies to API 650, API 12F, and UL 142 (only if welds not corroded) tanks.  
 Double Treq for UL 142 tanks if welds are affected.

### Roof

Year	Tmin (this test)	Tmin (last test)	time int	Corr rate	Treq cal	Treq min	Calc Intrv	Min Int	Year of ne
2009	0.16	0.25	39	0.0023	0.05	0.09	8	15	2017
2017	0.177	0.16	8	-0.0022	0.05	0.09	-10	15	2007
2007	0.158	0.177	-10	-0.0020	0.05	0.09	-9	15	1998
1998	0.141	0.158	-9	-0.0020	0.05	0.09	-7	15	1992

### Floor

Year	Tmin (this test)	Tmin (last test)	Corr rate	Treq cal	Treq min	Calc Intrv	Min Int	Year of ne
2005	0.16	0.25	35	0.0026	0.1	0.1	12	20
2017	0.13	0.16	12	0.0026	0.1	0.1	6	20
2023	0.115	0.13	6	0.0026	0.1	0.1	3	20
2025	0.114	0.14	3	0.0089	0.1	0.1	1	20

(0.05 if lined)

### Shell

Year	Tmin (this test)	Tmin (last test)	Corr rate	Treq cal	Treq min	Calc Intrv	Min Int	Year of ne
2009	0.21	0.25	39	0.0010	0.0362	0.1	27	15
2024	0.11	0.21	15	0.0067	0.0362	0.1	0	15
2024	0.11	0.11	0	0.0000	0.0362	0.1	#DIV/0!	15
#DIV/0!	0.11	0.11	#DIV/0!	#DIV/0!	0.0362	0.1	#DIV/0!	15

## Tank Integrity Testing Program

## FCC Environmental

Attach drawings if available

## Tank Data Sheet

Facility **Plant City, FL>**

Date Completed

**8/29/2007**By **Tom Burdeshaw**

Tank Identification

**T # 8**

Date of Construction

**1950**

Date of Installation

**(not used in calculations)**

Material

**CS**Thickness lowest course/shell  
(original, in floor center)  
roof/head**0.25**  
**0.375**  
**0.375**

Annular ring (if applicable)

**na**

Code (mark)

**na** riveted

Nominal Capacity (mark units)

**Gal 14,100**

Normal Contents (mark)

**Used oil**Dimensions (Height/Dia), ft.  
Orientation**24 10**  
**vert.**

Foundation type (mark)

**concrete**If concrete, mark ring or solid  
elevated or ground contact**solid**  
**ground**

Double bottom or release prevention barrier?

**no**

Insulation type (mark if none)

**none**

Coils - describe (mark if none)

**none**

Notes on repair or modification history

Formal external inspection

1st sign date **2009 Drew Frye 10/6/2009**2nd sign date **2014 1957**

Shell thickness testing

**2009 Drew Frye 10/6/2009****2025**

Internal inspection, floor &amp; shell

**2009**3rd sign date **2019 1957****2035**

4th sign date

**2024****#DIV/0!****2040**

The below applies to API 650, API 12F, and UL 142 (only if welds not corroded) tanks.

Double Treq for UL 142 tanks if welds are affected.

## Roof

Year	Tmin (this test)	Tmin (last test)	time int	Corr rate	Treq cal	Treq min	Calc Inrv	Min Int	Year of next test
2009	0.23	0.375	59	0.0025	0.05	0.09	14	15	2023
2023	0.177	0.23	14	0.0037	0.05	0.09	6	15	2029
2029	0.158	0.177	6	0.0033	0.05	0.09	5	15	2034
2034	0.141	0.158	5	0.0033	0.05	0.09	4	15	2038

## Floor

Year	Tmin (this test)	Tmin (last test)	Corr rate	Treq cal	Treq min	Calc Inrv	Min int	Year of next test	
2005	0.16	0.25	55	0.0016	0.1	0.1	18	20	2025
2025	0.13	0.16	20	0.0015	0.1	0.1	10	20	2035
2035	0.115	0.13	10	0.0015	0.1	0.1	5	20	2040
2040	0.114	0.14	5	0.0052	0.1	0.1	1	20	2041

(0.05 if lined)

## Shell

Year	Tmin (this test)	Tmin (last test)	Corr rate	Treq cal	Treq min	Calc Inrv	Min Int	Year of next test	
2009	0.31	0.25	59	-0.0010	0.0362	0.1	-52	15	1957
1957	0.11	0.31	-52	-0.0039	0.0362	0.1	-1	15	1957
1957	0.11	0.11	-1	0.0000	0.0362	0.1	#DIV/0!	15	#DIV/0!
IV/0!	0.11	0.11	#DIV/0!	#DIV/0!	0.0362	0.1	#DIV/0!	15	#DIV/0!

# Tank Integrity Testing Program

# FCC Environmental

Attach drawings if available

## Tank Data Sheet

Facility Plant City, FL.

Date Completed 8/29/2007

By Tom Burdeshaw

Tank Identification T #9

Date of Construction 1950

Date of Installation  (not used in calculations)

Material CS

Thickness lowest course/shell  
(original, in floor center)  
roof/head

0.375  
0.375  
0.25

Annular ring (if applicable) na

Code (mark) na riveted

Nominal Capacity (mark units) Gal 14,700 gal.  
Normal Contents (mark) Used oil RFO Fuel H2O

Dimensions (Height/Dia), ft.  
Orientation 25 10  
vert.

Foundation type (mark) concrete  
If concrete, mark ring or solid  
elevated or ground contact solid  
ground

Double bottom or release prevention barrier? no

Insulation type (mark if none) none  
Coils - describe (mark if none) none

Notes on repair or modification history

	1st	sign	date	2nd	sign	date	3rd	sign	date	4th	sign
Formal external inspection	<span>2009</span>	Drew Frye	10/6/2009	<span>2014</span>			<span>2019</span>			<span>2024</span>	
Shell thickness testing	<span>2009</span>	Drew Frye	10/6/2009	<span>2024</span>			<span>2024</span>			<span>#DIV/0!</span>	
Internal inspection, floor & shell	<span>2009</span>			<span>2025</span>			<span>2035</span>			<span>2040</span>	

The below applies to API 650, API 12F, and UL 142 (only if welds not corroded) tanks.  
Double Treq for UL 142 tanks if welds are affected.

### Roof

Year	Tmin (this test)	Tmin (last test)	time int	Corr rate	Treq cal	Treq min	Calc Intrv	Min Int	Year of next test
2009	0.23	0.25	59	0.0003	0.05	0.09	103	15	2024
2024	0.177	0.23	15	0.0035	0.05	0.09	6	15	2030
2030	0.158	0.177	6	0.0031	0.05	0.09	6	15	2036
2036	0.141	0.158	6	0.0031	0.05	0.09	4	15	2040

### Floor

Year	Tmin (this test)	Tmin (last test)	Corr rate	Treq cal	Treq min	Calc Intrv	Min Int	Year of next test
2005	0.16	0.25	55	0.0016	0.1	0.1	18	2025
2025	0.13	0.16	20	0.0015	0.1	0.1	10	2035
2035	0.115	0.13	10	0.0015	0.1	0.1	5	2040
2040	0.114	0.14	5	0.0052	0.1	0.1	1	2041

(0.05 if lined)

### Shell

Year	Tmin (this test)	Tmin (last test)	Corr rate	Treq cal	Treq min	Calc Intrv	Min Int	Year of next test
2009	0.37	0.375	59	0.0001	0.0378	0.1	796	2024
2024	0.11	0.37	15	0.0173	0.0378	0.1	0	2024
2024	0.11	0.11	0	0.0000	0.0378	0.1	#DIV/0!	15 #DIV/0!
#DIV/0!	0.11	0.11	#DIV/0!	#DIV/0!	0.0378	0.1	#DIV/0!	15 #DIV/0!

# Tank Integrity Testing Program

# FCC Environmental

Attach drawings if available

## Tank Data Sheet

Facility **Plant City, FL.**

Date Completed **8/29/2007** By **Tom Burdeshaw**

Tank Identification **T # 10**

Date of Construction **1950** Date of Installation **(not used in calculations)**

Material **CS**  
 Thickness lowest course/shell **0.375**  
 (original, in.) floor center) **0.375** Annular ring (if applicable) **na**  
 roof/head **0.25**

Code (mark) **na** riveted

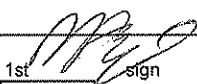
Nominal Capacity (mark units) **Gal 14,700**  
 Normal Contents (mark) **Used oil RFO Fuel H2O**

Dimensions (Height/Dia), ft. **25 10**  
 Orientation **vert.**

Foundation type (mark) **concrete**  
 If concrete, mark ring or solid **solid**  
 elevated or ground contact **ground**  
 Double bottom or release prevention barrier? **no**

Insulation type (mark if none) **none**  
 Coils - describe (mark if none) **none**

Notes on repair or modification history

1st  sign date 2nd sign date 3rd sign date 4th  
 Formal external inspection **2009** Drew Frye **10/6/2009** **2014** **2019** **2024**  
 Shell thickness testing **2009** Drew Frye **10/6/2009** **2024** **2035** **#DIV/0!**  
 Internal inspection, floor & shell **2009** **2025** **2035** **2040**

The below applies to API 650, API 12F, and UL 142 (only if welds not corroded) tanks.  
 Double Treq for UL 142 tanks if welds are affected.

Roof	Year	Tmin (this test)	Tmin (last test)	time int	Corr rate	Treq cal	Treq min	Calc Intrv	Min Int	Year of ne:
	2009	0.23	0.25	59	0.0003	0.05	0.09	103	15	2024
	2024	0.177	0.23	15	0.0035	0.05	0.09	6	15	2030
	2030	0.158	0.177	6	0.0031	0.05	0.09	6	15	2036
	2036	0.141	0.158	6	0.0031	0.05	0.09	4	15	2040

Floor	Year	Tmin (this test)	Tmin (last test)	Corr rate	Treq cal	Treq min	Calc Intrv	Min Int	Year of ne:	
	2005	0.16	0.25	55	0.0016	0.1	0.1	18	20	2025
	2025	0.13	0.16	20	0.0015	0.1	0.1	10	20	2035
	2035	0.115	0.13	10	0.0015	0.1	0.1	5	20	2040
	2040	0.114	0.14	5	0.0052	0.1	0.1	1	20	2041
						(0.05 if lined)				

(0.05 if lined)

Shell	Year	Tmin (this test)	Tmin (last test)	Corr rate	Treq cal	Treq min	Calc Intrv	Min Int	Year of ne:
	2009	0.355	0.375	59	0.0003	0.0378	0.1	188	15 2024
	2024	0.11	0.355	15	0.0163	0.0378	0.1	0	15 2024
	2024	0.11	0.11	0	0.0000	0.0378	0.1	#DIV/0!	15 #DIV/0!
#DIV/0!		0.11	0.11	#DIV/0!	#DIV/0!	0.0378	0.1	#DIV/0!	15 #DIV/0!

# Tank Integrity Testing Program

# FCC Environmental

Attach drawings if available

## Tank Data Sheet

Facility **Plant City, FL.**

Date Completed

**8/29/2007**

By **Tom Burdeshaw**

Tank Identification

**T # 10K**

Date of Construction

**1989**

Date of Installation

**Jul-89** (not used in calculations)

Material

**CS**

Thickness lowest course/shell  
(original, in floor center)  
roof/head

**0.2**  
**0.2**  
**0.1875**

Annular ring (if applicable)

**na**

Code (mark)

**UL 142**

Nominal Capacity (mark units)

**Gal 10,000**

Normal Contents (mark)

**over the road diesel fuel Fuel diesel**

Dimensions (Height/Dia), ft.  
Orientation

**16 10.5**  
**vert.**

Foundation type (mark)

**concrete**

If concrete, mark ring or solid  
elevated or ground contact

**solid**  
**ground**

Double bottom or release prevention barrier?

**no**

Insulation type (mark if none)

**none**

Coils - describe (mark if none)

**none**

Notes on repair or modification history

Formal external inspection

1st	sign	date	2nd	sign	date	3rd	sign	date	4th
2009	Drew Frye	10/6/2009	2014			2019			2024
2009	Drew Frye	10/6/2009	2024			2024			#DIV/0!
2009			2010			2013			2014

Shell thickness testing

Internal inspection, floor & shell

The below applies to API 650, API 12F, and UL 142 (only if welds not corroded) tanks.

Double Treq for UL 142 tanks if welds are affected.

### Roof

Year	Tmin (this test)	Tmin (last test)	time int	Corr rate	Treq cal	Treq min	Calc Intrv	Min Int	Year of ne:
2009	0.23	0.1875	20	-0.0021	0.05	0.09	-16	15	1993
1993	0.177	0.23	-16	-0.0032	0.05	0.09	-7	15	1986
1986	0.158	0.177	-7	-0.0028	0.05	0.09	-6	15	1980
1980	0.141	0.158	-6	-0.0028	0.05	0.09	-5	15	1975

### Floor

Year	Tmin (this test)	Tmin (last test)	Corr rate	Treq cal	Treq min	Calc Intrv	Min Int	Year of ne:	
2005	0.16	0.25	16	0.0056	0.1	0.1	5	20	2010
2010	0.13	0.16	5	0.0056	0.1	0.1	3	20	2013
2013	0.115	0.13	3	0.0056	0.1	0.1	1	20	2014
2014	0.114	0.14	1	0.0195	0.1	0.1	0	20	2015

(0.05 if lined)

### Shell

Year	Tmin (this test)	Tmin (last test)	Corr rate	Treq cal	Treq min	Calc Intrv	Min Int	Year of ne
2009	0.195	0.2	20	0.0003	0.0248	0.1	95	15 2024
2024	0.11	0.195	15	0.0057	0.0248	0.1	0	15 2024
2024	0.11	0.11	0	0.0000	0.0248	0.1	#DIV/0!	15 #DIV/0!
IV/0!	0.11	0.11	#DIV/0!	#DIV/0!	0.0248	0.1	#DIV/0!	15 #DIV/0!

# Tank Integrity Testing Program

# FCC Environmental

Attach drawings if available

## Tank Data Sheet

Facility

Date Completed  By

Tank Identification

Date of Construction  Date of Installation  (not used in calculations)

Material

Thickness lowest course/shell (original, in floor center)  Annular ring (if applicable)

roof/head

Code (mark)

Nominal Capacity (mark units)

Normal Contents (mark)

Dimensions (Height/Dia), ft.

Orientation

Foundation type (mark)

If concrete, mark ring or solid

elevated or ground contact

Double bottom or release prevention barrier?

Insulation type (mark if none)

Coils - describe (mark if none)

### Notes on repair or modification history

*Drew Frye*

	1st	sign	date	2nd	sign	date	3rd	sign	date	4th
Formal external inspection	2009	Drew Frye	10/6/2009	2014			2019			2024
Shell thickness testing	2009	Drew Frye	10/6/2009	2024			2024			#DIV/0!
Internal inspection, floor & shell	2009			2025			2035			2040

The below applies to API 650, API 12F, and UL 142 (only if welds not corroded) tanks.

Double Treq for UL 142 tanks if welds are affected.

### Roof

Year	Tmin (this test)	Tmin (last test)	time int	Corr rate	Treq cal	Treq min	Calc Intry	Min Int	Year of ne
2009	0.23	0.25	59	0.0003	0.05	0.09	103	15	2024
2024	0.177	0.23	15	0.0035	0.05	0.09	6	15	2030
2030	0.158	0.177	6	0.0031	0.05	0.09	6	15	2036
2036	0.141	0.158	6	0.0031	0.05	0.09	4	15	2040

### Floor

Year	Tmin (this test)	Tmin (last test)		Corr rate	Treq cal	Treq min	Calc Intry	Min Int	Year of ne
2005	0.16	0.25	55	0.0016	0.1	0.1	18	20	2025
2025	0.13	0.16	20	0.0015	0.1	0.1	10	20	2035
2035	0.115	0.13	10	0.0015	0.1	0.1	5	20	2040
2040	0.114	0.14	5	0.0052	0.1	0.1	1	20	2041

(0.05 if lined)

### Shell

Year	Tmin (this test)	Tmin (last test)	Corr rate	Treq cal	Treq min	Calc Intry: Min Int	Year of ne
2009	0.27	0.3125	59	0.0007	0.0488	0.1 59	15 2024
2024	0.11	0.27	15	0.0107	0.0488	0.1 0	15 2024
2024	0.11	0.11	0	0.0000	0.0488	0.1 #DIV/0!	15 #DIV/0!
#DIV/0!	0.11	0.11	#DIV/0!	#DIV/0!	0.0488	0.1 #DIV/0!	15 #DIV/0!

## Tank Integrity Testing Program

## FCC Environmental

Attach drawings if available

## Tank Data Sheet

Facility **Plant City, FL.**

Date Completed

**8/29/2007**By **Tom Burdeshaw**

Tank Identification

**T # 12**

Date of Construction

**1996**

Date of Installation

**May-80** (not used in calculations)

Material

**CS**Thickness lowest course/shell  
(original, in floor center)  
roof/head**0.25****0.25****0.25**

Annular ring (if applicable)

**na**

Code (mark)

**UL 142**

Nominal Capacity (mark units)

**Gal****24,000**

Normal Contents (mark)

**Used oil****RFO****Fuel****H2O**

Dimensions (Height/Dia), ft.

**37****10.5**

Orientation

**vert.**

Foundation type (mark)

**concrete**If concrete, mark ring or solid  
elevated or ground contact**solid****ground**

Double bottom or release prevention barrier?

**no**

Insulation type (mark if none)

**none**

Coils - describe (mark if none)

**none**

Notes on repair or modification history

Formal external inspection

1st

**2009**

sign

**Drew Frye**

date

**10/6/2009**

2nd

**2014**

sign

date

3rd

**2019**

sign

date

4th

**2024**

sign

Shell thickness testing

**2009****Drew Frye****10/6/2009****2024****2024****#DIV/0!**

Internal inspection, floor &amp; shell

**2009****2008****2010****2010**

The below applies to API 650, API 12F, and UL 142 (only if welds not corroded) tanks.

Double Treq for UL 142 tanks if welds are affected.

## Roof

Year	Tmin (this test)	Tmin (last test)	time int	Corr rate	Treq cal	Treq min	Calc Intrv	Min Int	Year of next test
2009	0.23	0.25	13	0.0015	0.05	0.09	23	15	2024
2024	0.177	0.23	15	0.0035	0.05	0.09	6	15	2030
2030	0.158	0.177	6	0.0031	0.05	0.09	6	15	2036
2036	0.141	0.158	6	0.0031	0.05	0.09	4	15	2040

## Floor

Year	Tmin (this test)	Tmin (last test)	Corr rate	Treq cal	Treq min	Calc Intrv	Min Int	Year of next test	
2005	0.16	0.25	9	0.0100	0.1	0.1	3	20	2008
2008	0.13	0.16	3	0.0100	0.1	0.1	2	20	2010
2010	0.115	0.13	2	0.0100	0.1	0.1	1	20	2010
2010	0.114	0.14	1	0.0347	0.1	0.1	0	20	2010

(0.05 if lined)

## Shell

Year	Tmin (this test)	Tmin (last test)		Corr rate	Treq cal	Treq min	Calc Intrv	Min Int	Year of next test
2009	0.245	0.25	13	0.0004	0.0595	0.1	94	15	2024
2024	0.11	0.245	15	0.0090	0.0595	0.1	0	15	2024
2024	0.11	0.11	0	0.0000	0.0595	0.1	#DIV/0!	15	#DIV/0!
#DIV/0!	0.11	0.11	#DIV/0!	#DIV/0!	0.0595	0.1	#DIV/0!	15	#DIV/0!

## Tank Integrity Testing Program

## FCC Environmental

Attach drawings if available

## Tank Data Sheet

Facility **Plant City, FL.**

Date Completed

**8/29/2007**By **Tom Burdeshaw**

Tank Identification

**T # 20KV**

Date of Construction

**1990**

Date of Installation

**Jul-89** (not used in calculations)

Material

**CS**Thickness lowest course/shell  
(original, in floor center)  
roof/head**0.2**  
**0.25**  
**0.185**

Annular ring (if applicable)

**na**

Code (mark)

**UL 142**

Nominal Capacity (mark units)

**Gal 20,000**

Normal Contents (mark)

**Used oil RFO Fuel H2O**Dimensions (Height/Dia), ft.  
Orientation**24 12**  
**vert.**

Foundation type (mark)

**concrete**If concrete, mark ring or solid  
elevated or ground contact**solid**  
**ground**

Double bottom or release prevention barrier?

**no**

Insulation type (mark if none)

**none**

Coils - describe (mark if none)

**none**

Notes on repair or modification history

*[Signature]*

Formal external inspection

1st	sign	date	2nd	sign	date	3rd	sign	date	4th	sign
2009	Drew Frye	10/6/2009	2014			2019			2024	
2009	Drew Frye	10/6/2009	2024			2024			#DIV/0!	
2009			2010			2013			2014	

Shell thickness testing

Internal inspection, floor &amp; shell

The below applies to API 650, API 12F, and UL 142 (only if welds not corroded) tanks.

Double Treq for UL 142 tanks if welds are affected.

## Roof

Year	Tmin (this test)	Tmin (last test)	time int	Corr rate	Treq cal	Treq min	Calc Intrv	Min Int	Year of next test
2009	0.16	0.185	19	0.0013	0.05	0.09	13	15	2022
2022	0.177	0.16	13	-0.0013	0.05	0.09	-17	15	2005
2005	0.158	0.177	-17	-0.0011	0.05	0.09	-15	15	1990
1990	0.141	0.158	-15	-0.0011	0.05	0.09	-11	15	1979

## Floor

Year	Tmin (this test)	Tmin (last test)	Corr rate	Treq cal	Treq min	Calc Intrv	Min Int	Year of next test
2005	0.16	0.25	15	0.0060	0.1	0.1	5	20
2010	0.13	0.16	5	0.0060	0.1	0.1	3	20
2013	0.115	0.13	3	0.0060	0.1	0.1	1	20
2014	0.114	0.14	1	0.0208	0.1	0.1	0	20

(0.05 if lined)

## Shell

Year	Tmin (this test)	Tmin (last test)	Corr rate	Treq cal	Treq min	Calc Intrv	Min Int	Year of next test
2009	0.195	0.2	19	0.0003	0.0434	0.1	90	15
2024	0.11	0.195	15	0.0057	0.0434	0.1	0	15
2024	0.11	0.11	0	0.0000	0.0434	0.1	#DIV/0!	15
#DIV/0!	0.11	0.11	#DIV/0!	#DIV/0!	0.0434	0.1	#DIV/0!	15



## Tank Integrity Testing Program

## FCC Environmental

Attach drawings if available

## Tank Data Sheet

Facility Plant City, FL.

Date Completed 8/29/2007

By Tom Burdeshaw

Tank Identification T # 20V

Date of Construction 1990

Date of Installation May-80 (not used in calculations)

Material

Thickness lowest course/shell  
(original, in floor center)  
roof/headCS  
0.25  
0.25  
0.25

Annular ring (if applicable)

na

Code (mark)

UL 142

Nominal Capacity (mark units)

Gal 20,700

Normal Contents (mark)

Used oil Antifreeze Fuel H2O

Dimensions (Height/Dia), ft.

32 10.5

Orientation

vert.

Foundation type (mark)

concrete

If concrete, mark ring or solid  
elevated or ground contact

solid

ground

Double bottom or release prevention barrier?

no

Insulation type (mark if none)

none

Coils - describe (mark if none)

none

Notes on repair or modification history

Formal external inspection

1st 2009

sign

date

2nd 2014

sign

date

3rd 2019

sign

date

4th 2024

Shell thickness testing

2009

Drew Frye 10/6/2009

2024

2024

#DIV/0!

Internal inspection, floor &amp; shell

2009

2010

2013

2014

The below applies to API 650, API 12F, and UL 142 (only if welds not corroded) tanks.

Double Treq for UL 142 tanks if welds are affected.

## Roof

Year	Tmin (this test)	Tmin (last test)	time int	Corr rate	Treq cal	Treq min	Calc Intrv	Min Int	Year of ne:
2009	0.23	0.25	19	0.0011	0.05	0.09	33	15	2024
2024	0.177	0.23	15	0.0035	0.05	0.09	6	15	2030
2030	0.158	0.177	6	0.0031	0.05	0.09	6	15	2036
2036	0.141	0.158	6	0.0031	0.05	0.09	4	15	2040

## Floor

Year	Tmin (this test)	Tmin (last test)	Corr rate	Treq cal	Treq min	Calc Intrv	Min Int	Year of ne:
2005	0.16	0.25	15	0.0060	0.1	0.1	5	20
2010	0.13	0.16	5	0.0060	0.1	0.1	3	20
2013	0.115	0.13	3	0.0060	0.1	0.1	1	20
2014	0.114	0.14	1	0.0208	0.1	0.1	0	20

(0.05 if lined)

## Shell

Year	Tmin (this test)	Tmin (last test)	Corr rate	Treq cal	Treq min	Calc Intrv	Min Int	Year of ne:
2009	0.23	0.25	19	0.0011	0.0512	0.1	31	15
2024	0.11	0.23	15	0.0080	0.0512	0.1	0	15
2024	0.11	0.11	0	0.0000	0.0512	0.1	#DIV/0!	15
#DIV/0!	0.11	0.11	#DIV/0!	#DIV/0!	0.0512	0.1	#DIV/0!	15

# Tank Integrity Testing Program

# FCC Environmental

Attach drawings if available

## Tank Data Sheet

Facility Plant City, FL.

Date Completed 8/29/2007 By Tom Burdeshaw

Tank Identification T # 24

Date of Construction Unknown Date of Installation May-80 (not used in calculations)

Material CS  
 Thickness lowest course/shell 0.250"  
 (original, in floor center) 0.375" Annular ring (if applicable) na  
 roof/head 0.375"

Code (mark) UL 142

Nominal Capacity (mark units) Gal 24,000 gal.  
 Normal Contents (mark) Used oil RFO Fuel H2O

Dimensions (Height/Dia), ft. 37.2" 10.5"  
 Orientation Horz

Foundation type (mark) concrete  
 If concrete, mark ring or solid Frame  
 elevated or ground contact elevated  
 Double bottom or release prevention barrier? yes

Insulation type (mark if none) Foam  
 Coils - describe (mark if none) 2" Pipe over-temperature control is functional (tested).

### Notes on repair or modification history

No detectable thinning. Limited test areas, due to insulation.  
 Condition poor because insulation is holding moisture. However, tank is heated, and this helps with drying.

*[Signature]*

	1st	sign	date	2nd	sign	date	3rd	sign	date	4th
Formal external inspection	<span>2009</span>	<span>Drew Frye</span>	<span>10/6/2009</span>	<span>2014</span>			<span>2019</span>			<span>2024</span>
Shell thickness testing	<span>2009</span>	<span>Drew Frye</span>	<span>10/6/2009</span>	<span>2014</span>			<span>0</span>			<span>0</span>
Internal inspection, floor& shell	<span>exempt</span>			<span>exempt</span>			<span>exempt</span>			<span>exempt</span>

# Tank Integrity Testing Program

# FCC Environmental

Attach drawings if available

## Tank Data Sheet

Facility

Date Completed  By

Tank Identification

Date of Construction  Date of Installation  (not used in calculations)

Material   
 Thickness lowest course/shell   
 (original, in floor center)   
 roof/head

Annular ring (if applicable)

Code (mark)

Nominal Capacity (mark units)     
 Normal Contents (mark)

Dimenitions (Height/Dia), ft.    
 Orientation

Foundation type (mark)   
 If concrete, mark ring or solid   
 elevated or ground contact   
 Double bottom or release prevention barrier?

Insulation type (mark if none)   
 Coils - describe (mark if none)

Notes on repair or modification history

	1st	sign	date	2nd	sign	date	3rd	sign	date	4th
Formal external inspection	2009	Drew Frye	10/6/2009	2014			2019			2024
Shell thickness testing	2009	Drew Frye	10/6/2009	2024			2024			#DIV/0!
Internal inspection, floor& shell	2009			2010			2013			2014

The below applies to API 650, API 12F, and UL 142 (only if welds not corroded) tanks.  
 Double Treq for UL 142 tanks if welds are affected.

### Roof

Year	Tmin (this test)	Tmin (last test)	time int	Corr rate	Treq cal	Treq min	Calc Intrv	Min Int	Year of ne:
2009	0.23	0.25	19	0.0011	0.05	0.09	33	15	2024
2024	0.177	0.23	15	0.0035	0.05	0.09	6	15	2030
2030	0.158	0.177	6	0.0031	0.05	0.09	6	15	2036
2036	0.141	0.158	6	0.0031	0.05	0.09	4	15	2040

### Floor

Year	Tmin (this test)	Tmin (last test)	Corr rate	Treq cal	Treq min	Calc Intrv	Min Int	Year of ne	
2005	0.16	0.25	15	0.0060	0.1	0.1	5	20	2010
2010	0.13	0.16	5	0.0060	0.1	0.1	3	20	2013
2013	0.115	0.13	3	0.0060	0.1	0.1	1	20	2014
2014	0.114	0.14	1	0.0208	0.1	0.1	0	20	2014

(0.05 if lined)

### Shell

Year	Tmin (this test)	Tmin (last test)	Corr rate	Treq cal	Treq min	Calc Intrv	Min Int	Year of ne:
2009	0.245	0.25	19	0.0003	0.0661	0.1	138	15 2024
2024	0.11	0.245	15	0.0090	0.0661	0.1	0	15 2024
2024	0.11	0.11	0	0.0000	0.0661	0.1	#DIV/0!	15 #DIV/0!
#DIV/0!	0.11	0.11	#DIV/0!	#DIV/0!	0.0661	0.1	#DIV/0!	15 #DIV/0!

# Tank Integrity Testing Program

## FCC Environmental

Attach drawings if available

### Tank Data Sheet

Facility

Date Completed  By

Tank Identification

Date of Construction  Date of Installation  (not used in calculations)

Material   
 Thickness lowest course/shell   
 (original, in floor center)   
 roof/head   
 Annular ring (if applicable)

Code (mark)

Nominal Capacity (mark units)    
 Normal Contents (mark)

Dimensions (Height/Dia), ft.    
 Orientation

Foundation type (mark)   
 If concrete, mark ring or solid   
 elevated or ground contact   
 Double bottom or release prevention barrier?

Insulation type (mark if none)   
 Coils - describe (mark if none)

Notes on repair or modification history

	1st	sign	date	2nd	sign	date	3rd	sign	date	4th	sign
Formal external inspection	1996	Inspections by outside		2002	Inspections by outside		2007	Inspections by outside		2012	
Shell thickness testing	2012	Inspections by outside		2016			#VALUE!			#VALUE!	
Internal inspection, floor& shell	2012	Inspections by outside		2016			#VALUE!			#VALUE!	

The below applies to API 650, API 12F, and UL 142 (only if welds not corroded) tanks.  
 Double Treq for UL 142 tanks if welds are affected.

#### Roof

Year	Tmin (this test)	Tmin (last test)	time int	Corr rate	Treq cal	Treq min	Calc Intrv	Min Int	Year of next test
2007	0.15	0.375"	#VALUE!	#VALUE!	0.05	0.09	#VALUE!	15	#VALUE!
#VALUE!	0.14	0.15	#VALUE!	#VALUE!	0.05	0.09	#VALUE!	15	#VALUE!
#VALUE!	0.13	0.14	#VALUE!	#VALUE!	0.05	0.09	#VALUE!	15	#VALUE!
#VALUE!	0.12	0.13	#VALUE!	#VALUE!	0.05	0.09	#VALUE!	15	#VALUE!

#### Floor

Year	Tmin (this test)	Tmin (last test)	Corr rate	Treq cal	Treq min	Calc Intrv	Min Int	Year of next test
2007	0.15	0.375"	#VALUE!	#VALUE!	0.1	0.1	#VALUE!	20
#VALUE!	0.149	0.15	#VALUE!	#VALUE!	0.1	0.1	#VALUE!	20
#VALUE!	0.13	0.149	#VALUE!	#VALUE!	0.1	0.1	#VALUE!	20
#VALUE!	0.12	0.14	#VALUE!	#VALUE!	0.1	0.1	#VALUE!	20

(0.05 if lined)

#### Shell

Year	Tmin (this test)	Tmin (last test)	Corr rate	Treq cal	Treq min	Calc Intrv	Min Int	Year of next test
2007	0.18	0.250"	#VALUE!	#VALUE!	#VALUE!	#VALUE!	#VALUE!	15
#VALUE!	0.17	0.18	#VALUE!	#VALUE!	#VALUE!	#VALUE!	#VALUE!	15
#VALUE!	0.16	0.17	#VALUE!	#VALUE!	#VALUE!	#VALUE!	#VALUE!	15
#VALUE!	0.15	0.16	#VALUE!	#VALUE!	#VALUE!	#VALUE!	#VALUE!	15

(0.1 min)

# Tank Integrity Testing Program

## FCC Environmental

Attach drawings if available

### Tank Data Sheet

Facility Plant City, FL.

Date Completed 8/29/2007 By Tom Burdeshaw

Tank Identification T # 630

Date of Construction Sep-99 Date of Installation Sep-99 (not used in calculations)

Material CS  
 Thickness lowest course/shell 0.250"  
 (original, in floor center) 0.375"  
 roof/head 0.375"  
 Annular ring (if applicable) na

Code (mark) API 650

Nominal Capacity (mark units) Gal 630,000  
 Normal Contents (mark) Used oil Fuel Distillate oily water

Dimensions (Height/Dia), ft. 37' 54'  
 Orientation vert.

Foundation type (mark) concrete  
 If concrete, mark ring or solid elevated solid pad  
 elevated or ground contact ground  
 Double bottom or release prevention barrier? yes

Insulation type (mark if none) none  
 Coils - describe (mark if none) none

Notes on repair or modification history

	1st	sign	date	2nd	sign	date	3rd	sign	date	4th	sign
Formal external inspection	2009			2014			2019			2024	
Shell thickness testing				2014			#VALUE!			#VALUE!	
Internal inspection, floor& shell				2029			#VALUE!			#VALUE!	

The below applies to API 650, API 12F, and UL 142 (only if welds not corroded) tanks.  
 Double Treq for UL 142 tanks if welds are affected.

#### Roof

Year	Tmin (this test)	Tmin (last test)	time int	Corr rate	Treq cal	Treq min	Calc Intrv	Min Int	Year of next test
2007	0.15	0.375"	-34397	#VALUE!	0.05	0.09	#VALUE!	15	#VALUE!
#VALUE!	0.14	0.15	#VALUE!	#VALUE!	0.05	0.09	#VALUE!	15	#VALUE!
#VALUE!	0.13	0.14	#VALUE!	#VALUE!	0.05	0.09	#VALUE!	15	#VALUE!
#VALUE!	0.12	0.13	#VALUE!	#VALUE!	0.05	0.09	#VALUE!	15	#VALUE!

#### Floor

Year	Tmin (this test)	Tmin (last test)	Corr rate	Treq cal	Treq min	Calc Intrv	Min Int	Year of next test
2007	0.15	0.375"	-34397	#VALUE!	0.1	0.1	#VALUE!	20
#VALUE!	0.149	0.15	#VALUE!	#VALUE!	0.1	0.1	#VALUE!	20
#VALUE!	0.13	0.149	#VALUE!	#VALUE!	0.1	0.1	#VALUE!	20
#VALUE!	0.12	0.14	#VALUE!	#VALUE!	0.1	0.1	#VALUE!	20

(0.05 if lined)

#### Shell

Year	Tmin (this test)	Tmin (last test)	Corr rate	Treq cal	Treq min	Calc Intrv	Min Int	Year of next test
2007	0.18	0.250"	-34397	#VALUE!	#VALUE!	#VALUE!	#VALUE!	15
#VALUE!	0.17	0.18	#VALUE!	#VALUE!	#VALUE!	#VALUE!	#VALUE!	15
#VALUE!	0.16	0.17	#VALUE!	#VALUE!	#VALUE!	#VALUE!	#VALUE!	15
#VALUE!	0.15	0.16	#VALUE!	#VALUE!	#VALUE!	#VALUE!	#VALUE!	15

(0.1 min)

# Tank Integrity Testing Program

# FCC Environmental

Attach drawings if available

## Tank Data Sheet

Facility **Plant City, FL.**

Date Completed

**8/29/2007**

By **Tom Burdeshaw**

Tank Identification

**T # C-1**

Date of Construction

**6-Mar**

Date of Installation

**Mar-06** (not used in calculations)

Material

**CS**

Thickness lowest course/shell  
(original, in floor center)  
roof/head

**0.250"**  
**0.250"**  
**0.250"**

Annular ring (if applicable)

**na**

Code (mark)

**API 650**

Nominal Capacity (mark units)

**Gal 30,000**

Normal Contents (mark)

**Used oil RFO Fuel H2O**

Dimensions (Height/Dia), ft.

**31' 12'**

Orientation

**vert.**

Foundation type (mark)

**concrete**

If concrete, mark ring or solid

**solid elevated pads**

elevated or ground contact

**4 legs**

Double bottom or release prevention barrier?

**yes**

Insulation type (mark if none)

**none**

Coils - describe (mark if none)

**none**

Notes on repair or modification history

2009 - like new in all regards

Formal external inspection

1st	sign	date	2nd	sign	date	3rd	sign	date	4th
2009	Drew Frye	10/6/2009	2014			2019			2024
2009			#VALUE!			#VALUE!			#VALUE!
2009			-10376			-16566			-19661

Shell thickness testing

Internal inspection, floor & shell

The below applies to API 650, API 12F, and UL 142 (only if welds not corroded) tanks.

Double Treq for UL 142 tanks if welds are affected.

### Roof

Year	Tmin (this test)	Tmin (last test)	time int	Corr rate	Treq cal	Treq min	Calc Intrv	Min Int	Year of ne
2009	0.23	0.250"	-37138	#VALUE!	0.05	0.09	#VALUE!	15	#VALUE!
#VALUE!	0.177	0.23	#VALUE!	#VALUE!	0.05	0.09	#VALUE!	15	#VALUE!
#VALUE!	0.158	0.177	#VALUE!	#VALUE!	0.05	0.09	#VALUE!	15	#VALUE!
#VALUE!	0.141	0.158	#VALUE!	#VALUE!	0.05	0.09	#VALUE!	15	#VALUE!

### Floor

Year	Tmin (this test)	Tmin (last test)	Corr rate	Treq cal	Treq min	Calc Intrv	Min Int	Year of ne
2005	0.16	0.25	-37142	0.0000	0.1	0.1	-12381	20
-10376	0.13	0.16	-12381	0.0000	0.1	0.1	-6190	20
-16566	0.115	0.13	-6190	0.0000	0.1	0.1	-3095	20
-19661	0.114	0.14	-3095	0.0000	0.1	0.1	-833	20

(0.05 if lined)

### Shell

Year	Tmin (this test)	Tmin (last test)	Corr rate	Treq cal	Treq min	Calc Intrv	Min Int	Year of ne
2009	0.29	0.250"	-37138	#VALUE!	#VALUE!	0.1	#VALUE!	15
#VALUE!	0.11	0.29	#VALUE!	#VALUE!	#VALUE!	0.1	#VALUE!	15
#VALUE!	0.11	0.11	#VALUE!	#VALUE!	#VALUE!	0.1	#VALUE!	15
#VALUE!	0.11	0.11	#VALUE!	#VALUE!	#VALUE!	0.1	#VALUE!	15

# Tank Integrity Testing Program

# FCC Environmental

Attach drawings if available

## Tank Data Sheet

Facility Plant City, FL.

Date Completed 8/29/2007 By Tom Burdeshaw

Tank Identification T # C-2

Date of Construction 6-Mar Date of Installation 6-Mar (not used in calculations)

Material CS  
 Thickness lowest course/shell 0.250"  
 (original, in floor center) 0.250"  
 roof/head 0.250"  
 Annular ring (if applicable) na

Code (mark) API 650

Nominal Capacity (mark units) Gal 30,000  
 Normal Contents (mark) Used oil RFO Fuel H2O Solids

Dimensions (Height/Dia), ft. 31' 12'  
 Orientation vert.

Foundation type (mark) concrete  
 If concrete, mark ring or solid solid elevated pads  
 elevated or ground contact 4 legs  
 Double bottom or release prevention barrier? yes

Insulation type (mark if none) none  
 Coils - describe (mark if none) none

### Notes on repair or modification history

2009 - like new in all regards

	1st	sign	date	2nd	sign	date	3rd	sign	date	4th	sign
Formal external inspection	2009	Drew Frye	10/6/2009	2014			2019			2024	
Shell thickness testing	2009			#VALUE!			#VALUE!			#VALUE!	
Internal inspection, floor& shell	2009			-10376			-16566			-19661	

The below applies to API 650, API 12F, and UL 142 (only if welds not corroded) tanks.  
 Double Treq for UL 142 tanks if welds are affected.

### Roof

Year	Tmin (this test)	Tmin (last test)	time int	Corr rate	Treq cal	Treq min	Calc Intrv	Min Int	Year of next test
2009	0.23	0.250"	-37138	#VALUE!	0.05	0.09	#VALUE!	15	#VALUE!
#VALUE!	0.177	0.23	#VALUE!	#VALUE!	0.05	0.09	#VALUE!	15	#VALUE!
#VALUE!	0.158	0.177	#VALUE!	#VALUE!	0.05	0.09	#VALUE!	15	#VALUE!
#VALUE!	0.141	0.158	#VALUE!	#VALUE!	0.05	0.09	#VALUE!	15	#VALUE!

### Floor

Year	Tmin (this test)	Tmin (last test)	Corr rate	Treq cal	Treq min	Calc Intrv	Min Int	Year of next test
2005	0.16	0.25	-37142	0.0000	0.1	0.1	-12381	20 -10376
-10376	0.13	0.16	-12381	0.0000	0.1	0.1	-6190	20 -16566
-16566	0.115	0.13	-6190	0.0000	0.1	0.1	-3095	20 -19661
-19661	0.114	0.14	-3095	0.0000	0.1	0.1	-833	20 -20494

(0.05 if lined)

### Shell

Year	Tmin (this test)	Tmin (last test)	Corr rate	Treq cal	Treq min	Calc Intrv	Min Int	Year of next test
2009	0.29	0.250"	-37138	#VALUE!	#VALUE!	0.1	#VALUE!	15 #VALUE!
#VALUE!	0.11	0.29	#VALUE!	#VALUE!	#VALUE!	0.1	#VALUE!	15 #VALUE!
#VALUE!	0.11	0.11	#VALUE!	#VALUE!	#VALUE!	0.1	#VALUE!	15 #VALUE!
#VALUE!	0.11	0.11	#VALUE!	#VALUE!	#VALUE!	0.1	#VALUE!	15 #VALUE!

# Tank Integrity Testing Program

# FCC Environmental

Attach drawings if available

## Tank Data Sheet

Facility Plant City, FL.

Date Completed 8/29/2007 By Tom Burdeshaw

Tank Identification T # C-3

Date of Construction 6-Mar Date of Installation 6-Mar (not used in calculations)

Material CS  
 Thickness lowest course/shell 0.250"  
 (original, in floor center) 0.250"  
 roof/head 0.250"

Annular ring (if applicable) na

Code (mark) API 650

Nominal Capacity (mark units) Gal 30,000  
 Normal Contents (mark) Used oil RFO Fuel H2O Solids

Dimensions (Height/Dia), ft. 31' 12'  
 Orientation vert.

Foundation type (mark) concrete  
 If concrete, mark ring or solid elevated or ground contact solid elevated pads  
 Double bottom or release prevention barrier? 4 legs yes

Insulation type (mark if none) none  
 Coils - describe (mark if none) none

### Notes on repair or modification history

2009 - like new in all regards

	1st	sign	date	2nd	sign	date	3rd	sign	date	4th
Formal external inspection	2009	Drew Frye	10/6/2009	2014			2019			2024
Shell thickness testing	2009			#VALUE!			#VALUE!			#VALUE!
Internal inspection, floor& shell	2009			-10376			-16566			-19661

The below applies to API 650, API 12F, and UL 142 (only if welds not corroded) tanks.

Double Treq for UL 142 tanks if welds are affected.

### Roof

Year	Tmin (this test)	Tmin (last test)	time int	Corr rate	Treq cal	Treq min	Calc Intrv	Min Int	Year of ne
2009	0.23	0.250"	-37138	#VALUE!	0.05	0.09	#VALUE!	15	#VALUE!
#VALUE!	0.177	0.23	#VALUE!	#VALUE!	0.05	0.09	#VALUE!	15	#VALUE!
#VALUE!	0.158	0.177	#VALUE!	#VALUE!	0.05	0.09	#VALUE!	15	#VALUE!
#VALUE!	0.141	0.158	#VALUE!	#VALUE!	0.05	0.09	#VALUE!	15	#VALUE!

### Floor

Year	Tmin (this test)	Tmin (last test)	Corr rate	Treq cal	Treq min	Calc Intrv	Min Int	Year of ne	
2005	0.16	0.25	-37142	0.0000	0.1	0.1	-12381	20	-10376
-10376	0.13	0.16	-12381	0.0000	0.1	0.1	-6190	20	-16566
-16566	0.115	0.13	-6190	0.0000	0.1	0.1	-3095	20	-19661
-19661	0.114	0.14	-3095	0.0000	0.1	0.1	-833	20	-20494

(0.05 if lined)

### Shell

Year	Tmin (this test)	Tmin (last test)	Corr rate	Treq cal	Treq min	Calc Intrv	Min Int	Year of ne	
2009	0.29	0.250"	-37138	#VALUE!	#VALUE!	0.1	#VALUE!	15	#VALUE!
#VALUE!	0.11	0.29	#VALUE!	#VALUE!	#VALUE!	0.1	#VALUE!	15	#VALUE!
#VALUE!	0.11	0.11	#VALUE!	#VALUE!	#VALUE!	0.1	#VALUE!	15	#VALUE!
#VALUE!	0.11	0.11	#VALUE!	#VALUE!	#VALUE!	0.1	#VALUE!	15	#VALUE!



# Tank Integrity Testing Program

# FCC Environmental

Attach drawings if available

## Tank Data Sheet

Facility Plant City, FL.

Date Completed 8/29/2007 By Tom Burdeshaw

Tank Identification SKE

Date of Construction 1970 assume Date of Installation Jul-87 (not used in calculations)

Material CS

Thickness lowest course/shell 0.25  
(original, in.) floor center 0.25 Annular ring (if applicable) na  
roof/head 0.1875 (new roof in 2006)

Code (mark) API 650

Nominal Capacity (mark units) Gal 44,650

Normal Contents (mark) Oily water

Dimensions (Height/Dia), ft. 19 20  
Orientation vert.

Foundation type (mark) concrete  
If concrete, mark ring or solid solid  
elevated or ground contact ground  
Double bottom or release prevention barrier? no

Insulation type (mark if none) none Formerly foam with serious corrosion under.  
Coils - describe (mark if none) none

### Notes on repair or modification history

July 2006 - new roof and wind girder installed (top of shell trimmed during girder replacement).  
Aug 2006 - new 0.125" patch plates at south axis near top of shell and at stair connection.  
T required =  $(2.6)(18)(20)/(16,520) = 0.057"$  therefore 0.10" minimum by API 653.  
May 2013. New holes visible near the rim. Limited UT test indicates no real change in general thicknesses.  
Not at risk of collapse but not suitable for service re. API 653.

**Tank is unsuitable for any hazardous materials**

	1st	sign	date	2nd	sign	date	3rd	sign	date	4th	sign
Formal external inspection	2009	Carol Jones	1/7/2009	2013	Drew Frye	5/8/2013	2018			2023	
Shell thickness testing	2009	Carol Jones	1/7/2009	2013	Drew Frye	5/8/2013	2014			2014	
Internal inspection, floor& shell	2009			2017			2023			2025	

The below applies to API 650, API 12F, and UL 142 (only if welds not corroded) tanks.

Double Treq for UL 142 tanks if welds are affected.

### Roof

Year	Tmin (this test)	Tmin (last test)	time int	Corr rate	Treq cal	Treq min	Calc Intrval	Min Int	Year of next test
2009	0.182	0.1875	2.5	0.0022	0.05	0.09	10	15	2011
2011	0.177	0.182	2	0.0025	0.05	0.09	9	15	2020
2020	0.158	0.177	9	0.0022	0.05	0.09	8	15	2027
2027	0.141	0.158	8	0.0022	0.05	0.09	6	15	2033

### Floor

Year	Tmin (this test)	Tmin (last test)	Corr rate	Treq cal	Treq min	Calc Intrval	Min Int	Year of next test	
2005	0.16	0.25	35	0.0026	0.1	0.1	12	20	2017
2017	0.13	0.16	12	0.0026	0.1	0.1	6	20	2023
2023	0.115	0.13	6	0.0026	0.1	0.1	3	20	2025
2025	0.114	0.14	3	0.0089	0.1	0.1	1	20	2026

(0.05 if lined)

### Shell

Year	Tmin (this test)	Tmin (last test)	Corr rate	Treq cal	Treq min	Calc Intrval	Min Int	Year of next test	
2009	0.11	0.25	39	0.0036	0.0567	0.1	1	15	2010
2013	0.105	0.11	4	0.0013	0.0567	0.1	1	15	2014
2014	0.11	0.105	1	-0.0050	0.0567	0.1	0	15	2014
2014	0.11	0.11	-1	0.0000	0.0567	0.1	#DIV/0!	15	#DIV/0!

use. Water only.

date

(new roof installed in July 2006 = 2.5 years. Set next interval to 2 years to get a more accurate corrosion rate for first 5 years of new roof, especially near fill and v



**Atmospheric Tower**

1st	sign	date
2013	Drew Frye	5/8/2013
2nd		
2028		

Skirt thickness  
Shell thickness

0.42"  
Variable, 0.62-0.63" in all areas except in the  
Because of the age and the original design pr  
engineering structural evaluation ur

Height 50'  
Dia. 4'  
Build date pre 1975

Nominal thickness in. 0.625 body  
0.425 skirt

**Vacuum Tower**

1st	sign	date
2013	Drew Frye	5/8/2013
2nd		
2028		

Because of insulation, detailed UT inspection not practice  
Reinspection recommended in 15 years, base

Height 50'  
Dia. 4'  
Build date pre 1975

Nominal thickness in. UK body  
UK skirt

area just past (within 30") of the tangential entry, where it is 0.50-0.52"  
essure rating > 250 psi and safety valve setting (2 psi) this unit will not require  
until the thickness reaches 0.25". Reinspection recommended in 15 years, bases up[on API practice.

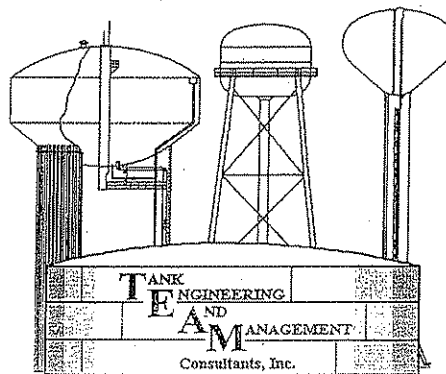
il or needed, based upon inspection of atmospheric tower.  
as up[on API practice.

# ABOVEGROUND TANK INSPECTION REPORT

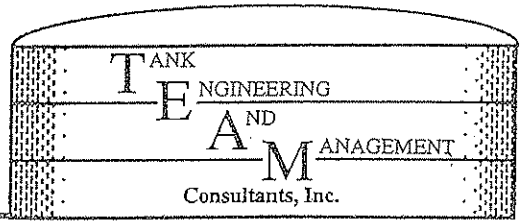
FCC ENVIRONMENTAL  
PLANT CITY, FL

TANK 630  
54'-0" DIAMETER x 37'-0" HIGH FBCR  
15,000 BBL

NOVEMBER 2009



PO Box 889 ♦ 4000 STATE ROAD 60 EAST  
MULBERRY, FLORIDA 33860  
(863) 354-9010 ♦ (863) 648-4988 Fax



ABOVEGROUND STORAGE TANK  
OUT-OF-SERVICE INSPECTION REPORT

NOVEMBER 2009

**TANK 630**  
54' DIAMETER x 37' HIGH - 15,000 BBL's  
PLANT CITY FACILITY  
PLANT CITY, FLORIDA

PREPARED FOR:

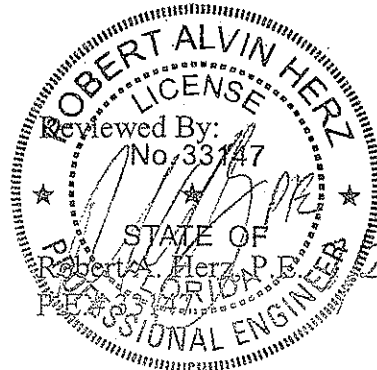
**FCC ENVIRONMENTAL**

PRESENTED BY:

TANK ENGINEERING AND MANAGEMENT CONSULTANTS, INC.  
PO Box 889  
Mulberry, Florida 33860

By:

Christopher L. Moore  
API-653 Certified Inspector #33610



## EXECUTIVE SUMMARY

RE: **API-653 OUT -OF-SERVICE INSPECTION REPORT**  
Tank 630 - 54'Ø x 37' - FBCR – 15,000 BBL's  
Plant City Facility, Plant City, Florida  
TEAM Project No: 09-1062

An Interior Out-of-Service inspection was performed on the above referenced tank by *Tank Engineering And Management Consultants, Inc. (TEAM)*, on November 23, 2009. The purpose of the inspection was to determine the condition of the tank in reference to:

- a. Suitability for service per API-653 Standards.
- b. Conformance with Florida's Department of Environmental Protection Rule 62-762.

This inspection was performed to meet the requirements of Florida Department of Environmental Protection (FDEP) Rule 62-762 and was performed in accordance with American Petroleum Institute (API) Standard 653. TEAM performed an engineering evaluation according to the API-653 requirements.

This inspection was performed by Christopher L. Moore, API-653 Certified Aboveground Tank Inspector. This report was reviewed by Robert A. Herz, P. E.

Tank 630 is used to store used oil, and was found to be in good overall condition. Minor corrosion found on the chime, isolated areas of the roof and stairs. These areas should be repaired in the near future to prevent further corrosion. **At this time this tank complies with API-653 requirements.**

Tank 630 is defined as a "Category- C Tank System", per FDEP 62-762.201(4). FDEP Rule 62-762.511 provides standards for Category-C storage tank systems in accordance with Rule 62-762.501, F.A.C. with respect to:

- **Exterior Coating** 62-762.501(1)(b): *Exterior portions of aboveground tanks and aboveground integral piping, excluding double-walled systems, shall be coated or otherwise protected from external corrosion. The coating shall be designed and applied to resist corrosion, deterioration, and degradation of the exterior wall. SSPC-PA 1, Paint Application Specification No. 1 may be used to protect storage tank systems from external corrosion.*

At the time of this inspection, the exterior of this tank was found to be in overall good condition.

- **Secondary Containment** 62-762.511 Table AST T (1) - *By January 1, 2000: With the exception of siting and material construction standards, Category-A and Category-B systems shall meet the performance standards of Rule 62-762.501, F.A.C.*



**62-762.501(2)(c) 1, 2 - Secondary containment:**

1. *All tanks installed or constructed at a facility after July 13, 1998, shall have secondary containment beneath the tank and within the dike field area...*
2. *Release prevention barriers such as double-bottoms, liners, or other under-tank secondary containment systems for field-erected tanks shall be designed and constructed in accordance with API Standard 650.*

This tank is equipped with a steel secondary containment tank. The secondary containment is sized to hold at least 110% of the primary tank volume.

- **Cathodic Protection** 62-762.511 Table AST T (1)(a) - By January 1, 2000: *Storage tank system construction standards that include cathodic protection remain applicable; and FDEP 62-761.501(2)(b)(4): Steel tanks in contact with soil shall have a cathodic protection system...*

The tank rests on a concrete slab. Therefore, cathodic protection is not required.

- **Overfill Protection** 62-762.501(2)(d)(2) - *Overfill protection shall be performed in accordance with API RP 2350 and FDEP 62-762.501 section (2)(d)(4). Which states all tanks must have at least an overflow safety feature.*

This tank is equipped with a high level alarm. Therefore, this tank meets the requirements for overfill protection as required by FDEP 62-762.501(2)(d) 4 a & b.

- **Release Detection** 62-762.611(1)(a): *Category-A and Category-B systems. Release detection methods shall be one of the methods specified in this section, and shall meet the performance standards contained in Rule 62-762.641, F.A.C.*

The primary tank rests within a steel Secondary Containment Tank. Any release from the Primary Tank would be visible inside the Secondary Containment Tank.

**ANTICIPATED INSPECTION CYCLE**

This tank was found suitable for current service. As required by API-653, an In-Service inspection is Due in the fourth quarter of 2014 and an Out-of-Service (Internal) inspection is due in the fourth quarter of 2029.

**CONCLUSION**

This tank meets the requirements of API-653 "Suitability for Service" and State of Florida Department of Environmental Protection Rule 62-762.

## INSPECTION METHODOLOGY AND PROCEDURES

### **DEFINITIONS**

Throughout this report, certain subjective terms will be used to describe the condition of various items. These terms are typically meant to imply the following definitions:

Good – Currently in nearly new condition. Minor defects may be present, but do not present a hindrance to the operation of the item.

Fair – Slightly less than ideal condition. This item has not failed, but is in a state of degradation that will likely result in failure in the near future.

Poor – The item has failed, or is near failure.

The tank inspection consisted of two parts:

- 1) **Field Inspection**
- 2) **Engineering Evaluation**

### **FIELD INSPECTION**

The field inspection was performed in general accordance with API Standard 653, (Second Edition, December 1995, Addendum 4, December, 1999) entitled "Tank Inspection, Repair, Alteration, and Reconstruction", and TEAM Out-of-Service, Aboveground Storage Tank Inspection Procedure, Revision (1) dated August, 2003.

### **INSPECTION PERSONNEL**

The field inspection was performed by Christopher L. Moore, Certified API-653 #33610, Aboveground Tank Inspector.

### **INSPECTION PROCEDURES AND EQUIPMENT**

The inspection procedures follow the recommendations of API-653 as required, including:

1. Tank layout and physical measurements.
2. Visual inspection of the Roof, Shell, Bottom, Structural and Accessories.
3. A visual inspection of the site and the tank exterior surface was performed, checking for: proper drainage, leaks, shell distortions, signs of settlement, corrosion, and condition of the foundation, coatings, accessories, and appurtenances.
4. Ultrasonic Thickness Measurements (UTM's) were taken on the nozzles, shell, and roof. UTM's were taken with a Panametrics 26DL Plus instrument operating on a dual transducer, "pulse echo" technique with "coating eliminator" software. The instrument calibration was verified before and after the testing was performed.
5. Color photographs were taken on the tank exterior and interior of all essential structures, appurtenances and deficiencies.
6. The tank bottom was scanned with an MFE Enterprises 2412MKII tank floor scanner.

## ENGINEERING EVALUATION EVALUATION STANDARDS

1. API Standards
2. Florida DEP Rule 62-762
3. *Tank Engineering And Management Consultants, Inc.*, Standards

## ENGINEERING PERSONNEL & QUALIFICATIONS

1. An evaluation of the tank structure in order to determine the suitability of continued service is performed by personnel experienced in the design and construction of Aboveground Storage Tanks.
2. Robert A. Herz, P.E., Florida Professional Engineer License No. 33147.

## EVALUATION PROCEDURES

The engineering evaluation follows the recommendations of API-653 including:

1. Internal corrosion due to the product stored or water bottoms.
2. External corrosion due to environmental exposure.
3. Stress levels and allowable stress levels.
4. Properties of the stored product such as specific gravity, temperature, and corrosively.
5. Metal design temperatures at the service location of the tank.
6. External roof live load, wind, and seismic loading.
7. Tank foundation, soil and settlement conditions.
8. Chemical analysis and mechanical properties of the materials of construction.
9. Distortions of the existing tank.
10. Operating conditions such as filling/emptying rates and frequency.

## TANK HISTORY

Tank No. 630 was built by Fisher Tank at this site in 1999. This tank is built inside of a steel secondary containment tank which measures 64'-0" diameter x 29'-0" tall. This is the first Out-of-Service inspection on this tank.

## STRUCTURE DESCRIPTION

The following information was furnished to us or observed:

<b>Manufacturer:</b>	Fisher Tank
<b>Year Re-constructed:</b>	1999
<b>Capacity:</b>	15,000 BBL Nominal
<b>Tank Diameter:</b>	54' -0"
<b>Tank Height:</b>	37'
<b>No. Shell Courses:</b>	5
<b>Rim Angle:</b>	3" x 3" x 1/4" Angle Out
<b>Type Floor:</b>	1/4" Lap Welded Plate
<b>Type Fixed Roof:</b>	Single Column Supported Cone/Lap Welded Plate

**Material:** Carbon Steel  
**Design:** API-650 – 9<sup>th</sup> Ed.  
**Specific Gravity:** 1.0  
**Product Stored:** Used Oil

## INSPECTION OBSERVATIONS

### **Tank Shell**

UTM's were taken on the tank shell at five readings per plate on the bottom course and three readings per course on the upper courses. All readings are similar to the original construction.

### **Tank Bottom**

The tank bottom was constructed with a 1/4" thick steel bottom. An MFE scan was performed on the bottom during this inspection and there were no indications of underside corrosion. The tank bottom appears to be in good condition.

### **Roof/Structural**

Ultrasonic Thickness Measurements (UTM's) were taken on the roof. The original roof thickness was 1/4" (0.250") nominal. The roof plate thicknesses taken during this inspection ranged from 0.234" to 0.259" with an average reading of 0.246". It appears that the roof has suffered very little, if any, metal loss, and is in good overall condition.

### **Accessories**

See the attached shell and roof layouts attached to this report for a schedule and locations of all attached appurtenances.

All accessories were found to be in good condition. Minor corrosion was found on the stairs and platforms. These areas should be prepared and repainted in the near future.

### **Foundation and Site**

The Secondary Tank rests on a concrete slab foundation. The Primary Tank rests inside the Secondary Tank. An elevation survey was performed inside the Primary Tank. The results of the survey are shown on the attached chart entitled "Radial Elevations" and "Perimeter Elevations". The elevations were analyzed and found to be within the limits of API-653.

### **Coating Condition**

The exterior coating is in good overall condition.

## ENGINEERING EVALUATION

### Tank Shell Design Analysis

According to the manufacturer's nameplate, this tank was built using A36 carbon steel. As presented in API Standard 653, an allowable stress of 23,595 pounds per square inch (psi) for tank courses 1 and 2 allowable stress of 25,960 psi for tank courses 3 through 6 and a joint efficiency of 85% (.85) was used in the following formula to calculate the minimal required shell thickness for each shell course.

$$t_{\min} = \frac{(2.6)(D)(H)G}{SE}$$

Where:

- $t_{\min}$  = Shell Thickness
- H = Datum Height to bottom of ring
- S = Allowable Stress per API-653 (23,600 psi Course 1-2, 26,000 psi Course 3-5)
- D = Nominal Tank Diameter (54 feet)
- G = Specific Gravity (1.0)
- E = Joint Efficiency (85%)

The results of the tank shell design analysis are presented below.

### SHELL DESIGN DATA

Shell Course No.	Shell course Height (inches)	Datum Height (feet) (h)	Original Plate Material	API-653 Min. Thick. (inches) (E=1.0)	Original Thickness (inches)	2007 Average Measured Thickness (inches)	2009 Average Measured Thickness (inches)
1 Btm	72	34	Unknown	0.228	¼" Nominal	0.253	0.256
2	72	28	Unknown	0.188	¼" Nominal	0.247	0.247
3	72	22	Unknown	0.147	¼" Nominal	0.253	0.252
4	72	16	Unknown	0.107	¼" Nominal	0.248	0.250
5 Top	72	10	Unknown	0.100	¼" Nominal	0.255	0.252

\*API-653 Standard requires no shell course be less than 0.100"

As presented above, this tank exceeds the API Standard 653 minimum allowable shell thickness for all courses.

### Roof Analysis

Isolated coating failure is allowing corrosion to form on a few areas and should be repaired to mitigate corrosion rate. With the exception of the few areas of corrosion, this roof appears to be in good condition.

### Dimensional Tolerance Analysis

No significant non-conformance's to API Construction Standards were found.

### **Brittle Fracture Analysis**

This tank has demonstrated the ability to withstand the combined effects of maximum liquid level and lowest operating temperatures without failing for at least ten (10) years. Based on the location of the tank in Central Florida, the risk of failure due to brittle fracture with continued service is minimal.

Further evaluation is required if there is a change in service, or if additional repairs/alterations are made that do not meet the requirements of API-653, or if deterioration of the tank has occurred.

### **Tank Settlement Analysis**

Elevation readings were taken inside the tank and the readings are within the range of API-653 Appendix B requirements. See attached elevation charts for more detail.

### **CONCLUSION**

This tank meets the requirements of API-653 "Suitability for Service" and State of Florida Department of Environmental Protection Rule 62-762. **This tank is suitable for continued service.**

The next inspection required by API 653 and the FDEP is an In-Service Inspection, which must be done by the fourth quarter of 2014. API 653 and FDEP require the Owner to inspect the tank monthly. If the tank is taken out of service at any time prior to the next required Out of Service Inspection, an Out of Service Inspection must be performed at that time.

## **RECOMMENDATIONS**

### **Mandatory Repairs/Renovations Required To Meet API-653 and/or FDEP Requirements:**

1. None at this time.

### **Non-Mandatory Recommendations:**

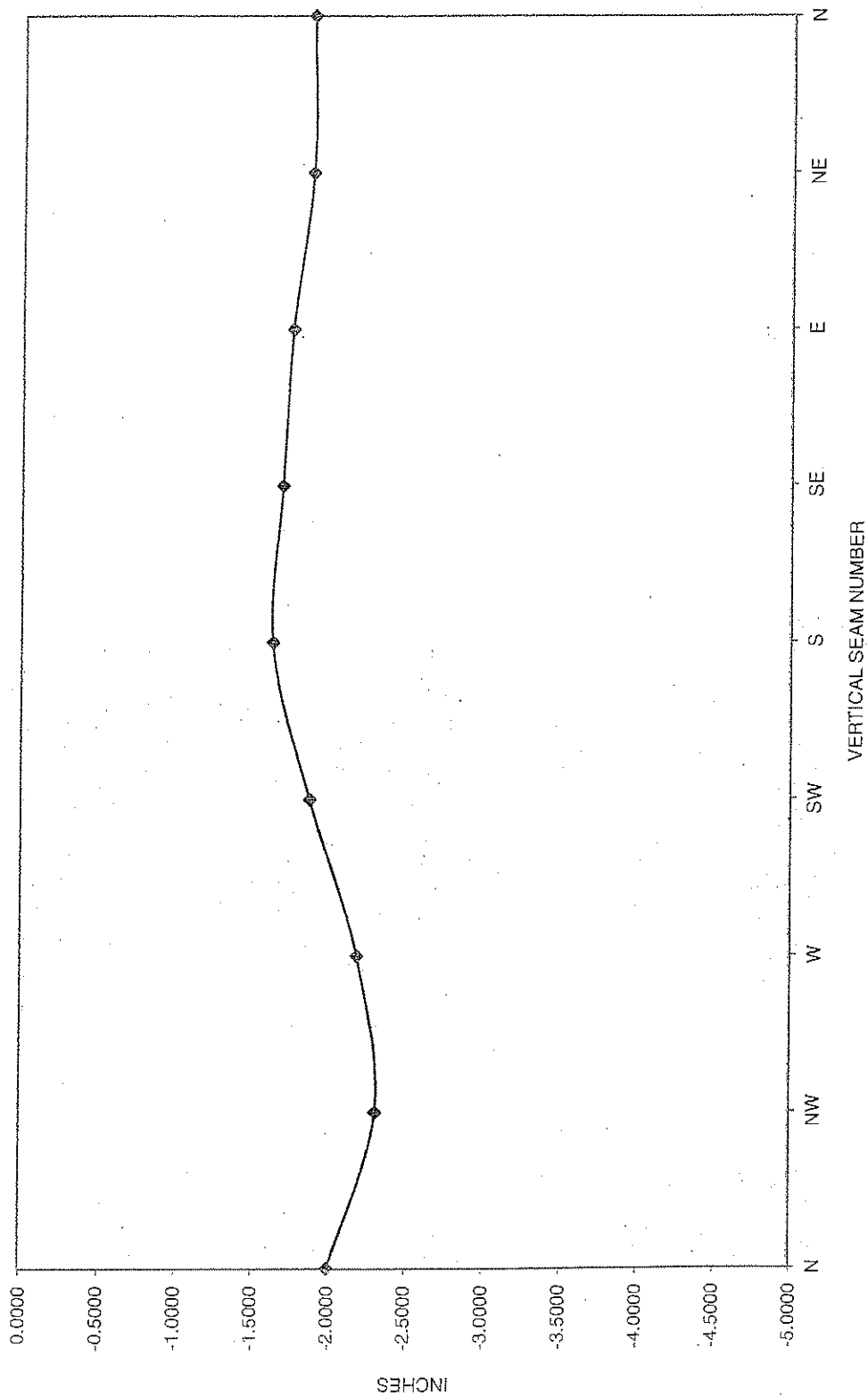
1. Mitigate corrosion on the chime, exterior roof, stairs and platforms.

We appreciate the opportunity of performing this inspection service for you. Should you have any questions regarding the information contained herein, please do not hesitate to contact us.

**-END OF REPORT -**

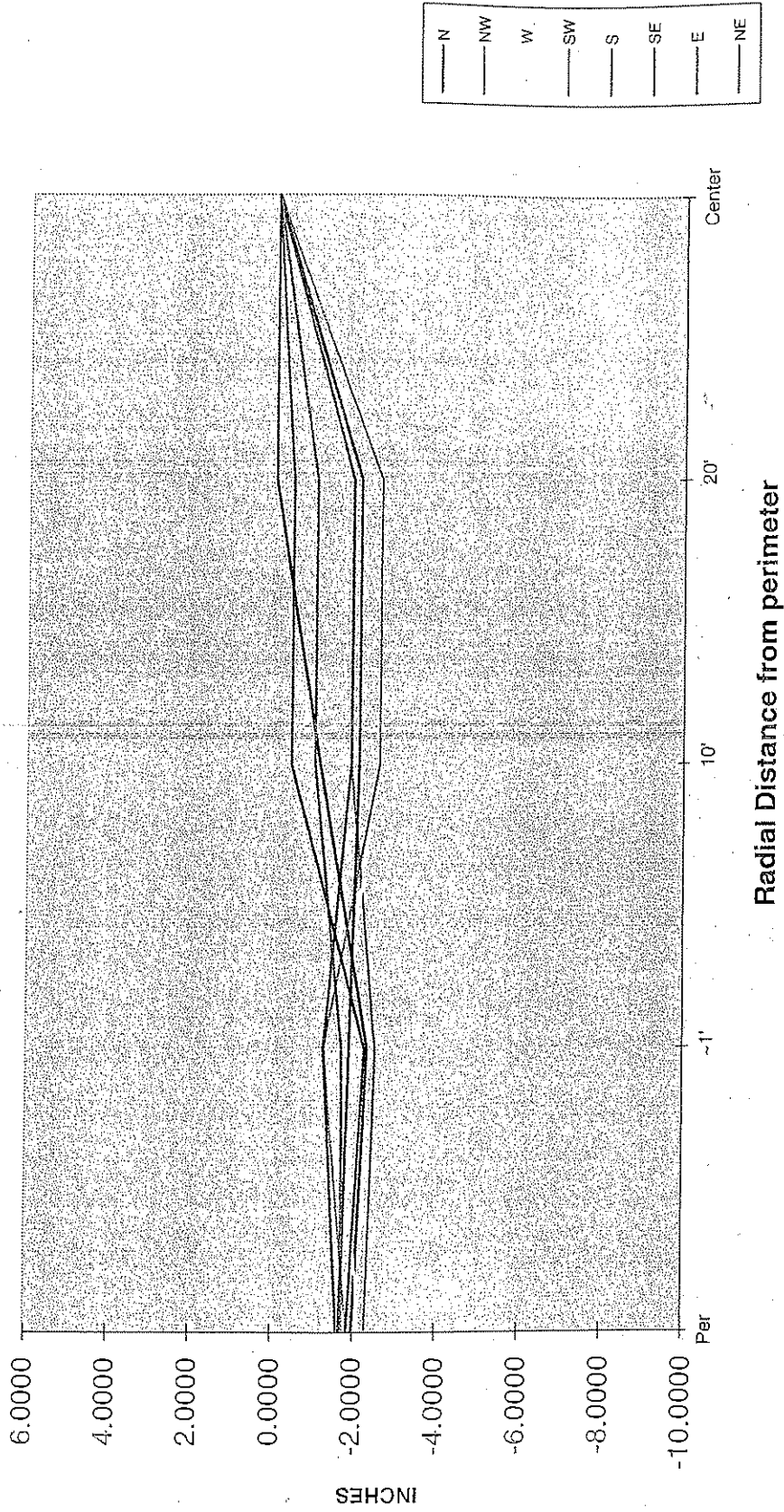
FCC ENVIRONMENTAL  
PLANT CITY, FL  
TANK 630

PERIMETER ELEVATIONS

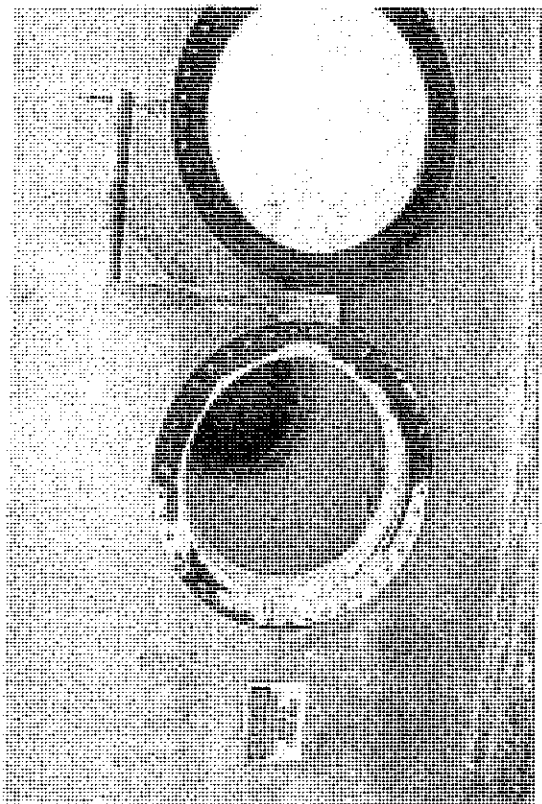


FCC ENVIRONMENTAL  
PLANT CITY, FL  
TANK 630

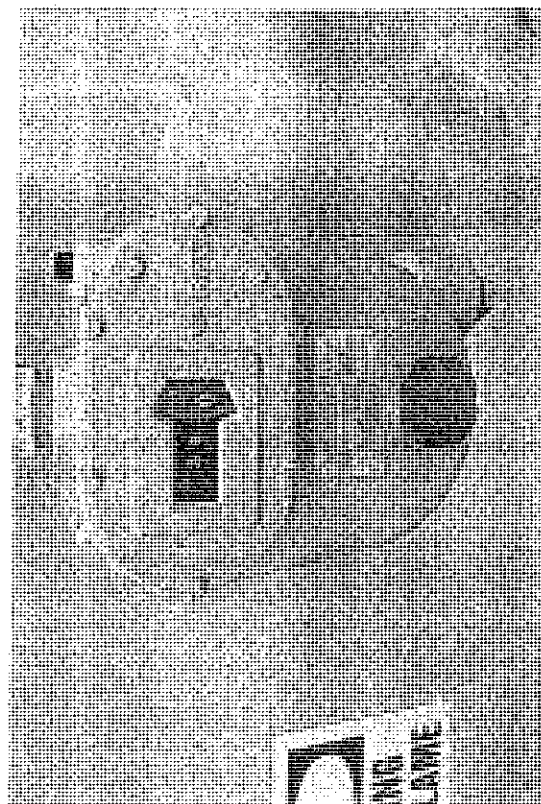
RADIAL ELEVATION DIFERENTIALS



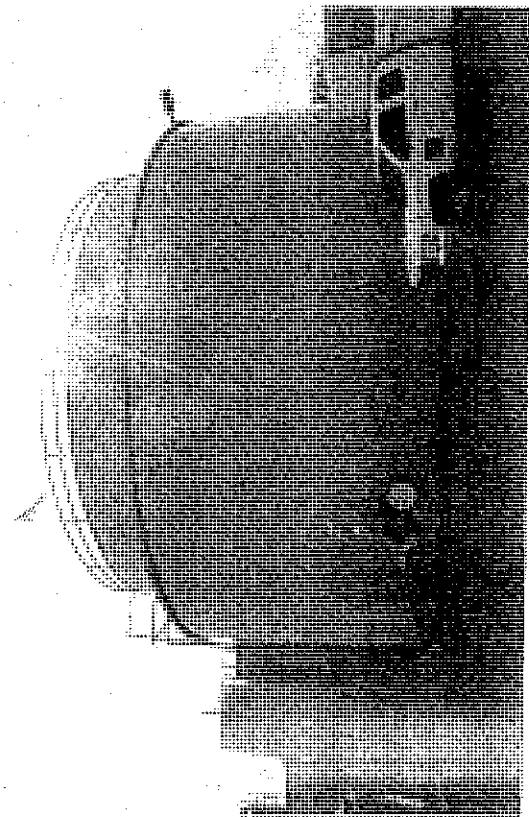




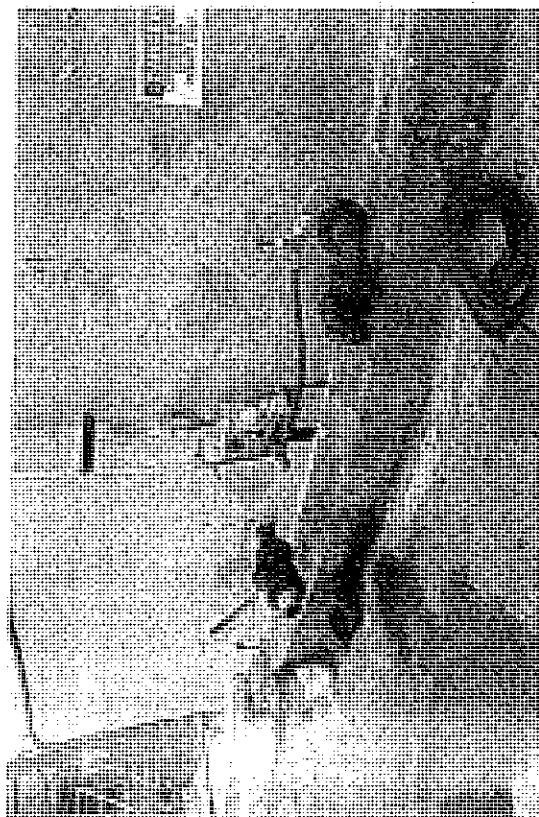
2. Tank Manway.



4. Tank Liquid Level Indicator.



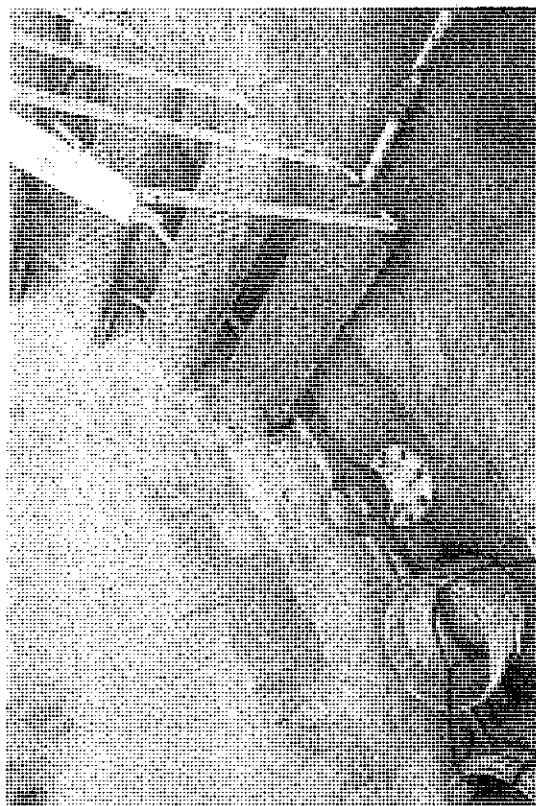
1. Tank Overall.



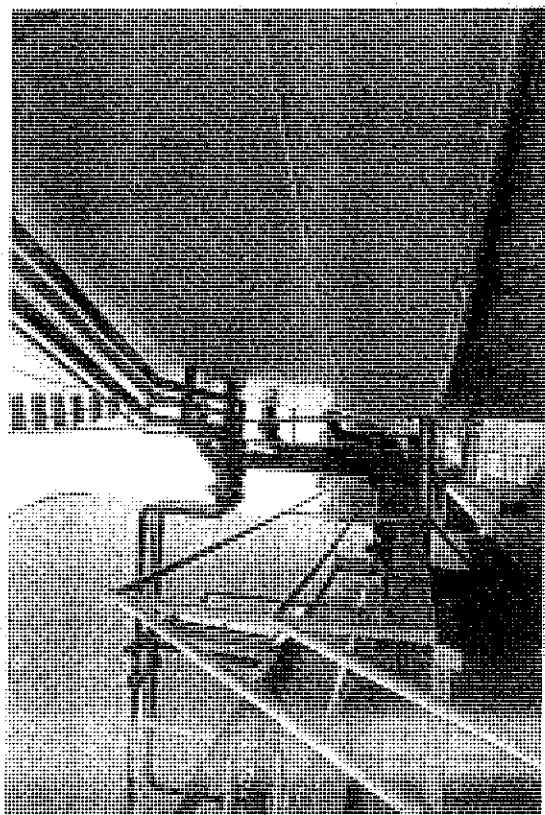
3. Tank Nozzles.



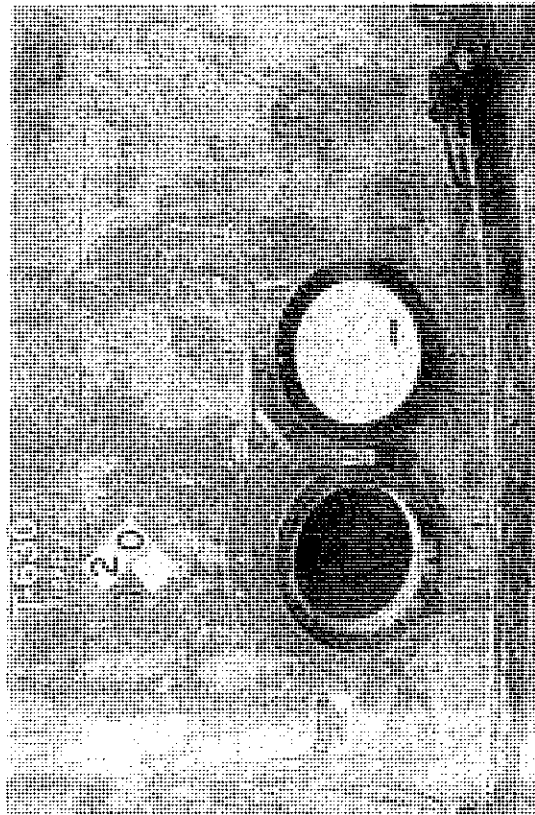
6. Tank Nozzles 3.



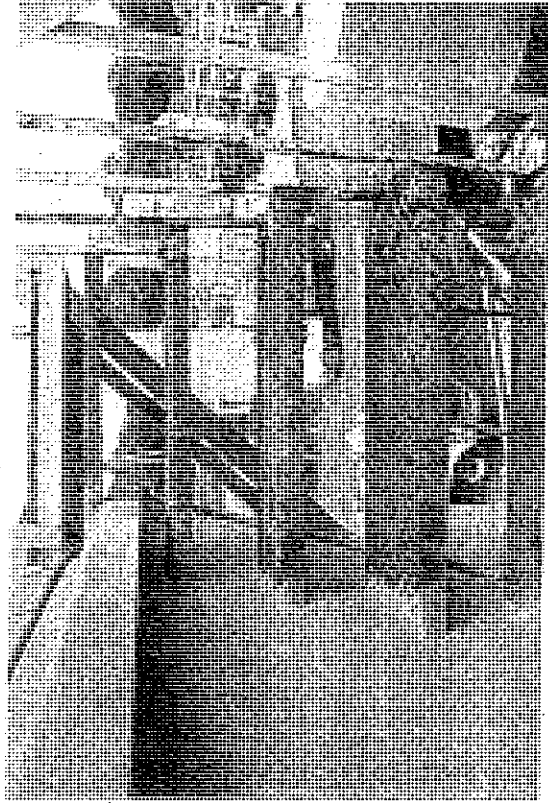
8. Base of Stairs.



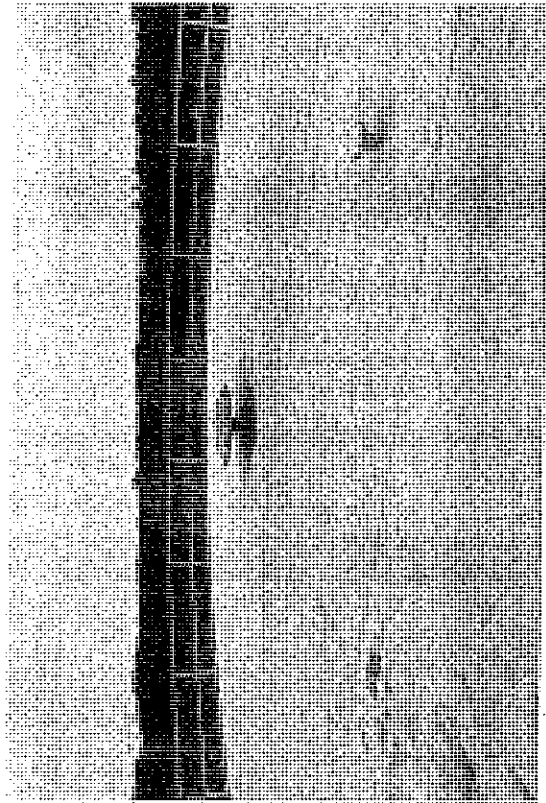
5. Tank Nozzles 2.



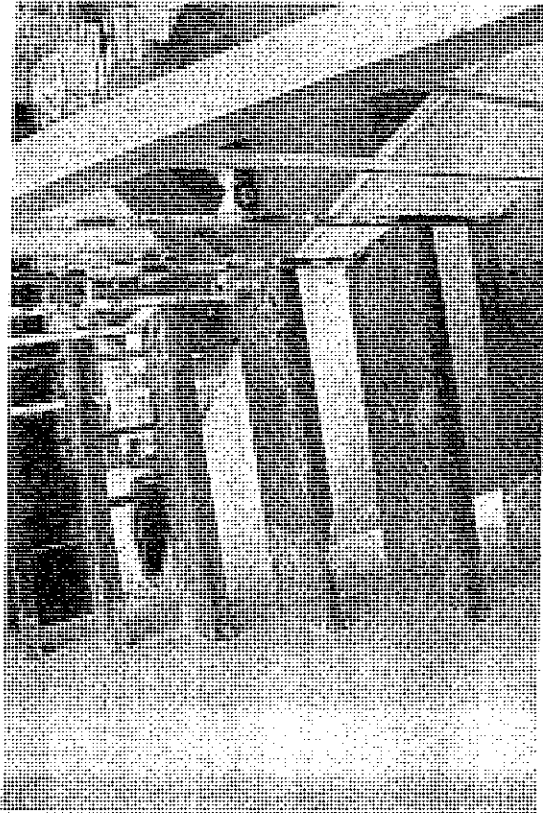
7. Tank Manway 2.



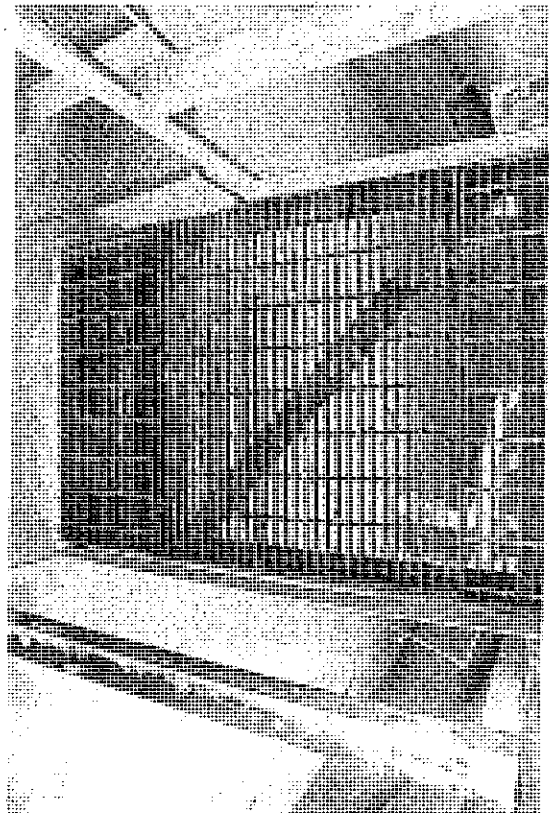
10. Stairs with Corrosion 2.



12. Roof Overall.

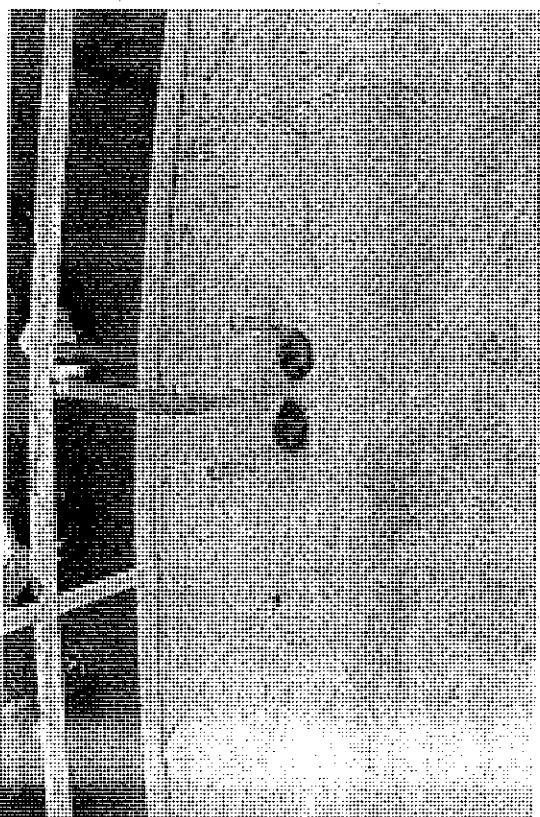


9. Stairs with Corrosion.

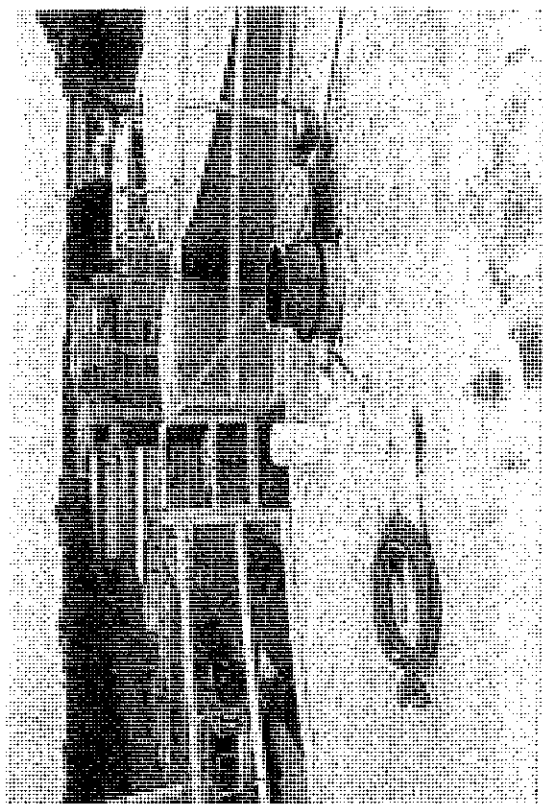


11. Catwalk.

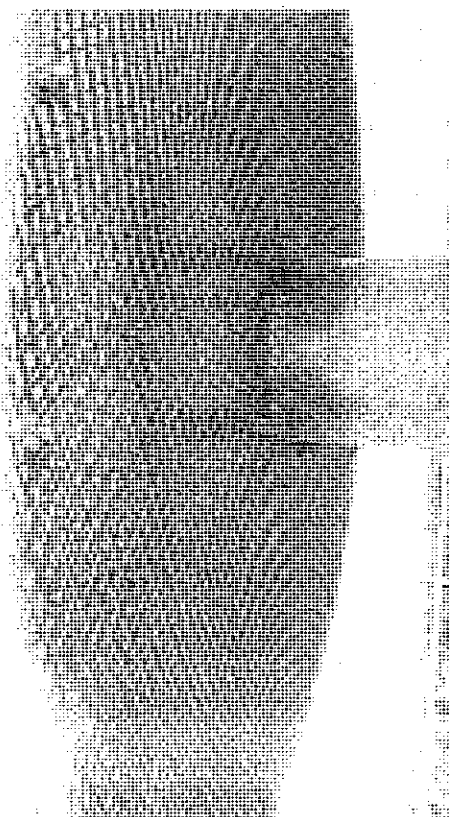




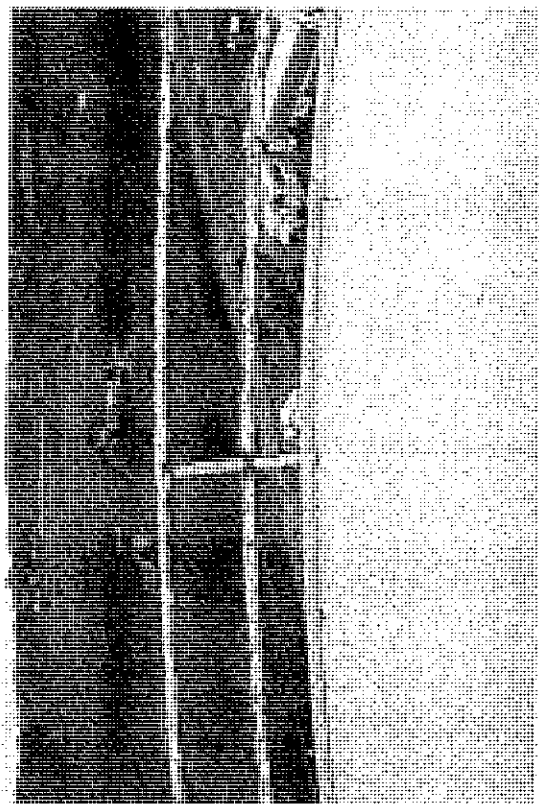
13. Roof Liquid Level Indicator.



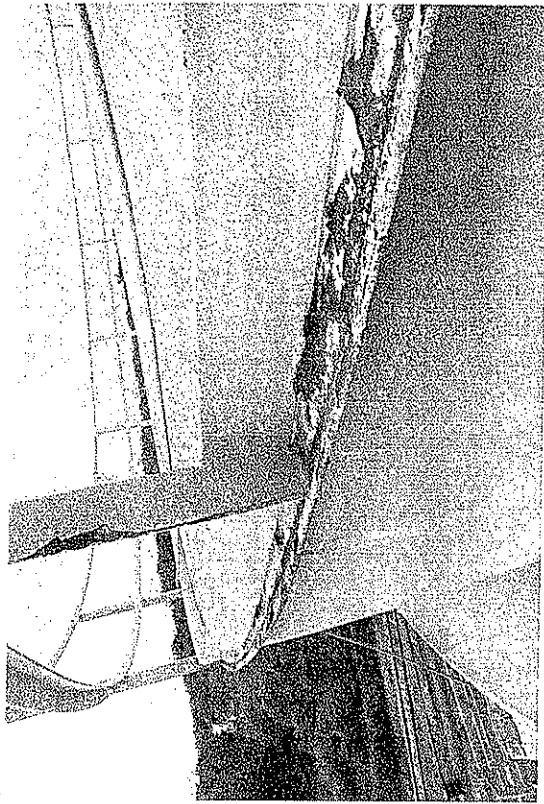
14. Roof Manway and Rails.



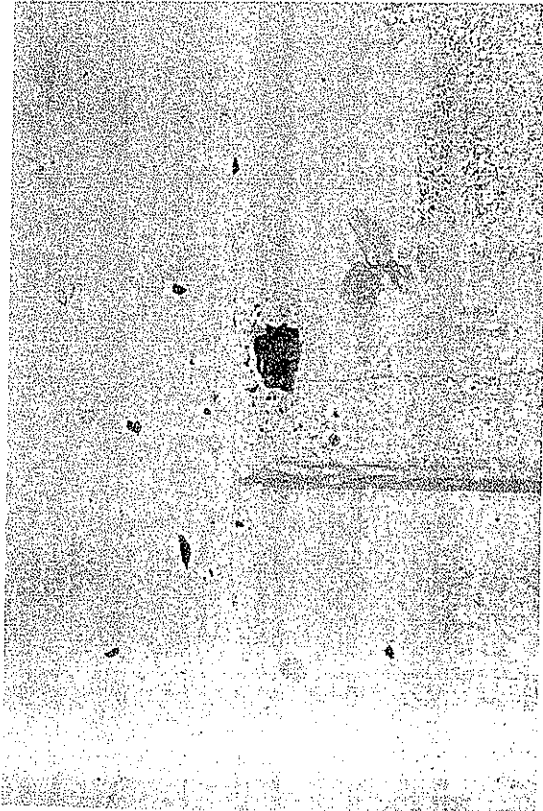
15. Center Vent Screen.



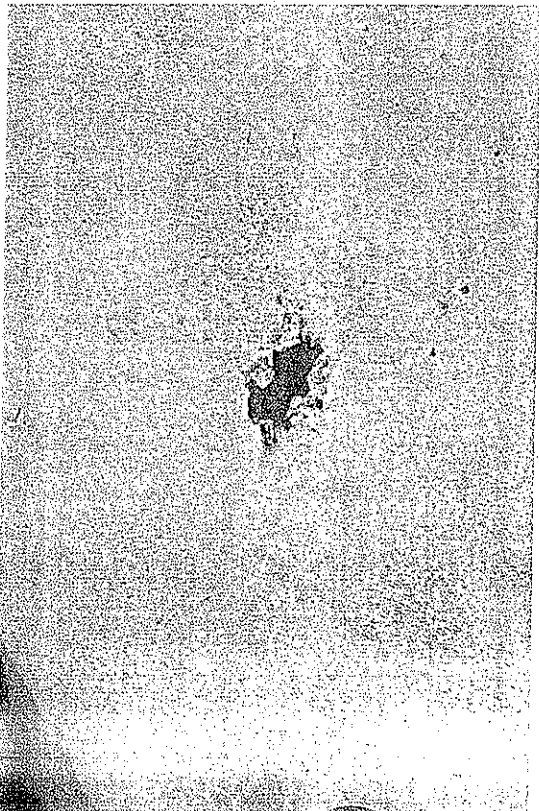
16. Roof Hand Rails with Corrosion.



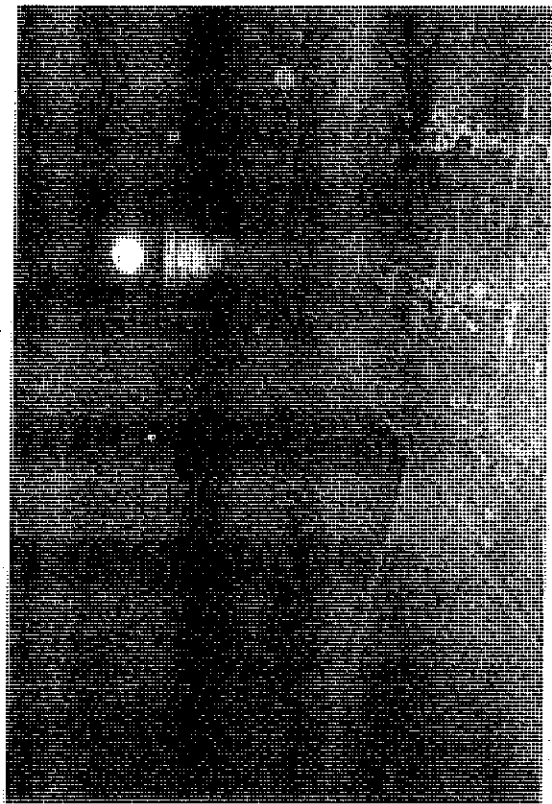
18. Rim Angle with Corrosion.



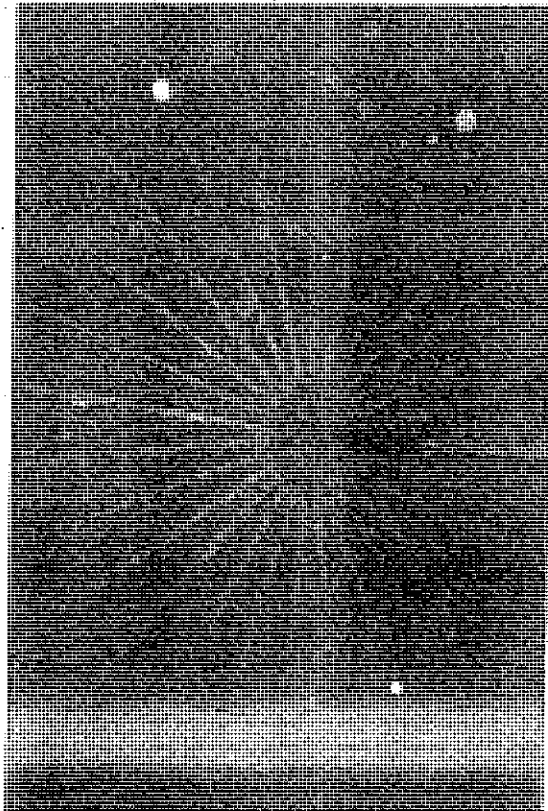
17. Roof Coating Failure and Corrosion.



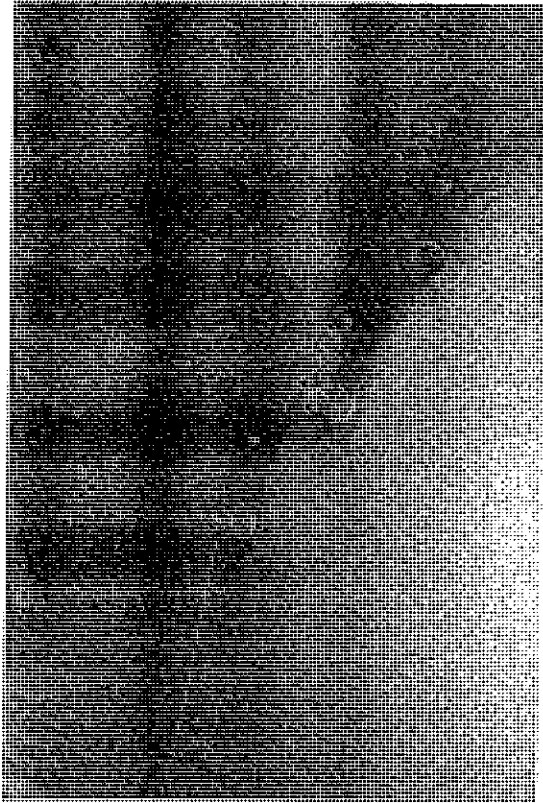
19. Roof Coating Failure with Corrosion 2.



20. Interior Overall.



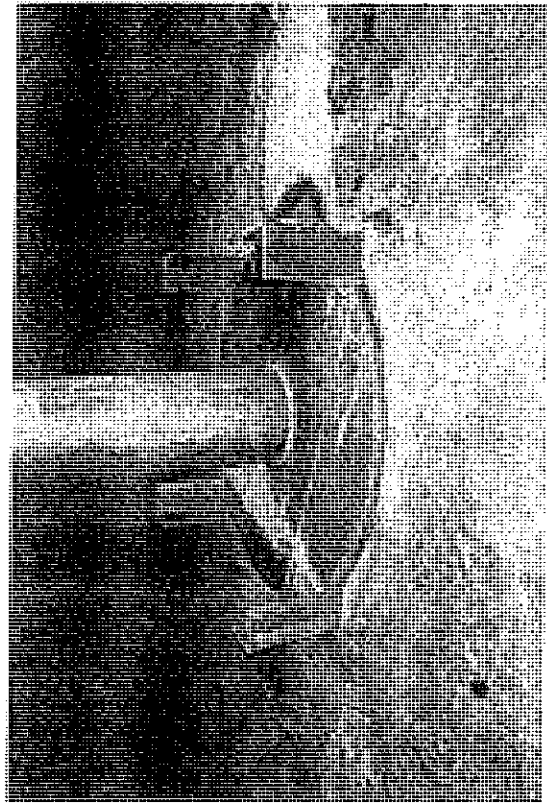
21. Interior Rafters.



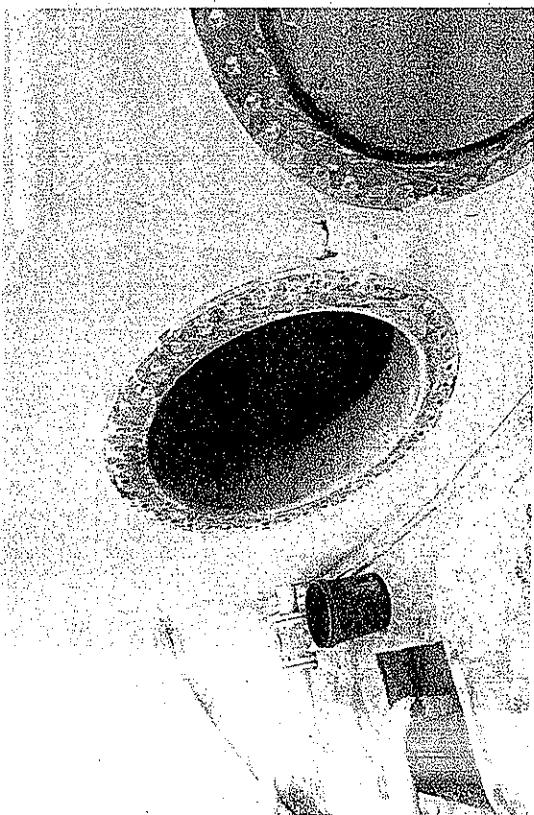
22. Interior Inlets.



23. Interior Nozzles.



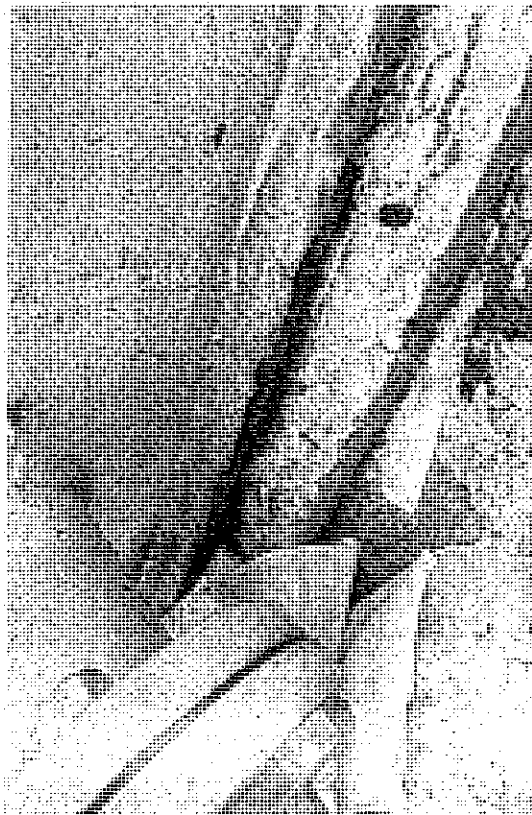
24. Interior Center Column.



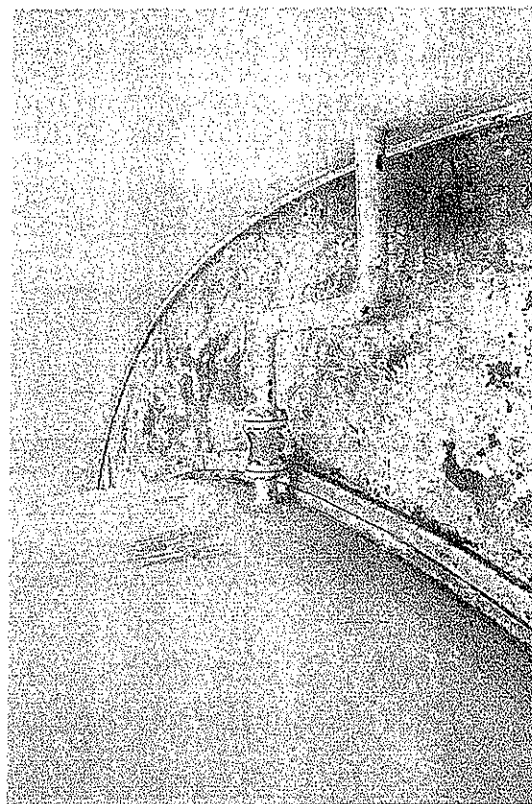
25. Inner Manway.



26. Tank Chime Corrosion.



27. Tank Chime Corrosion.



28. Tank Shell with Standing Water Stains.

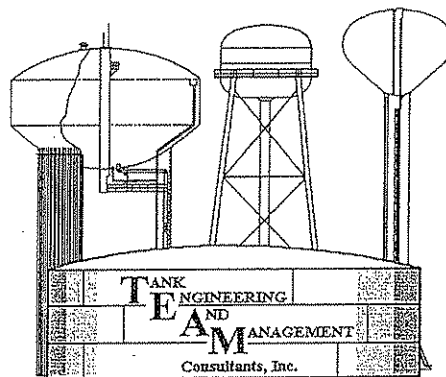


# ABOVEGROUND TANK INSPECTION REPORT

FCC ENVIRONMENTAL  
PLANT CITY, FL

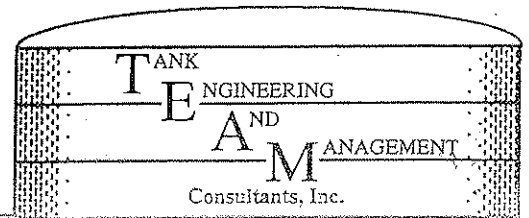
TANK 552  
50'-0" DIAMETER x 34'-0" HIGH FBCR  
12,000 BBL'S

JULY 2012



PO Box 889 ♦ 4000 STATE ROAD 60 EAST  
MULBERRY, FLORIDA 33860  
(863) 354-9010 ♦ (863) 648-4988 Fax





ABOVEGROUND STORAGE TANK  
IN-SERVICE INSPECTION REPORT

JULY 2012

**TANK 552**  
50'-0" DIAMETER x 34'-0" HIGH - 12,000 BBL's  
PLANT CITY FACILITY

PREPARED FOR:

**FCC ENVIRONMENTAL**  
Plant City, FL

PRESENTED BY:

**TANK ENGINEERING AND MANAGEMENT CONSULTANTS, INC.**

PO Box 889  
Mulberry, Florida 33860  
Phone (863) 354-9010 Fax (863) 648-4988

By:

Christopher L. Moore  
API Certification No. 33610

Reviewed By:

  
Victor G. Garaycochea, P.E.  
P.E. No. 71208  
7/24/12

## EXECUTIVE SUMMARY

RE: API-653 IN-SERVICE INSPECTION REPORT  
Tank 552 - 50'Ø x 34' - FBCR – 12,000 BBL's  
Plant City Facility, Plant City, Florida  
TEAM Project No: 12-0792

An external In-Service inspection was performed on the above referenced tank by *Tank Engineering And Management Consultants, Inc. (TEAM)*, on July 19<sup>th</sup>, 2012. The purpose of the inspection was to determine the condition of the tank in reference to:

- a. Suitability for service per API-653 Standards.
- b. Conformance with Florida's Department of Environmental Protection Rule 62-762.

This inspection was performed to meet the requirements of Florida Department of Environmental Protection (FDEP) Rule 62-762 and was performed in accordance with American Petroleum Institute (API) Standard 653. TEAM performed an engineering evaluation according to the API-653 requirements.

This inspection was performed by Christopher L. Moore, API-653 Certified Aboveground Tank Inspector. This report was reviewed by Victor G. Garaycochea, P. E.

Tank 552 is used to store #5 fuel oil, and was found to be in good overall condition. Corrosion was found on the rim angle of the tank. This corrosion should be mitigated to prevent further metal loss. The roof coating is in poor condition and should be recoated. The roof should be recoated in the next three to five years. **At this time this tank complies with API-653 requirements.**

Tank 552 is defined as a "Category- A Tank System", per FDEP 62-762.201(4). FDEP Rule 62-762.511 provides deadlines for Category-A and Category-B storage tank systems to meet the standards for Category-C storage tank systems in accordance with Rule 62-762.501, F.A.C. with respect to:

- **Exterior Coating** 62-762.501(1)(b): *Exterior portions of aboveground tanks and aboveground integral piping, excluding double-walled systems, shall be coated or otherwise protected from external corrosion. The coating shall be designed and applied to resist corrosion, deterioration, and degradation of the exterior wall. SSPC-PA 1, Paint Application Specification No. 1 may be used to protect storage tank systems from external corrosion.*

At the time of this inspection, the exterior of this tank was found to be in overall fair condition. The roof coating is in poor condition.

- *Secondary Containment 62-762.511 Table AST T (1) - By January 1, 2000: With the exception of siting and material construction standards, Category-A and Category-B systems shall meet the performance standards of Rule 62-762.501, F.A.C.*

**62-762.501(2)(c) 1, 2 - Secondary containment:**

1. *All tanks installed or constructed at a facility after July 13, 1998, shall have secondary containment beneath the tank and within the dike field area...*
2. *Release prevention barriers such as double-bottoms, liners, or other under-tank secondary containment systems for field-erected tanks shall be designed and constructed in accordance with API Standard 650.*

This tank is used to store high viscosity products. Therefore, the above requirements for secondary containment do not apply.

- **Cathodic Protection** 62-762.511 Table AST T (1)(a) - By January 1, 2000: *Storage tank system construction standards that include cathodic protection remain applicable; and FDEP 62-761.501(2)(b)(4): Steel tanks in contact with soil shall have a cathodic protection system...*

This tank rests on a concrete slab. Therefore, cathodic protection is not required.

- **Overfill Protection** 62-762.501(2)(d)(2) - *Overfill protection shall be performed in accordance with API RP 2350 and FDEP 62-762.501 section (2)(d)(4). Which states all tanks must have at least one overflow safety feature.*

This tank is equipped with a high level alarm. Therefore, this tank meets the requirements for overfill protection as required by FDEP 62-762.501(2)(d) 4 a & b.

- **Release Detection** 62-762.611(1)(a): *Category-A and Category-B systems. Release detection methods shall be one of the methods specified in this section, and shall meet the performance standards contained in Rule 62-762.641, F.A.C.*

This tank is used to store a high viscosity product, so release detection requirements do not apply. However, any release would be visible between the tank bottom and the concrete slab.

**ANTICIPATED INSPECTION CYCLE**

This tank was found suitable for current service. As required by API-653, an Out-of-Service (Internal) inspection is due by January 2016.

**CONCLUSION**

This tank meets the requirements of API-653 "Suitability for Service" and State of Florida Department of Environmental Protection Rule 62-762.

## INSPECTION METHODOLOGY AND PROCEDURES

### **DEFINITIONS**

Throughout this report, certain subjective terms will be used to describe the condition of various items. These terms are typically meant to imply the following definitions:

Good – Currently in nearly new condition. Minor defects may be present, but do not present a hindrance to the operation of the item.

Fair – Slightly less than ideal condition. This item has not failed, but is in a state of degradation that will likely result in failure in the near future.

Poor – The item has failed, or is near failure.

The tank inspection consisted of two parts:

- 1) **Field Inspection**
- 2) **Engineering Evaluation**

### **FIELD INSPECTION**

The field inspection was performed in general accordance with API Standard 653, (Second Edition, December 1995, Addendum 4, December, 1999) entitled "Tank Inspection, Repair, Alteration, and Reconstruction", and TEAM Out-of-Service, Aboveground Storage Tank Inspection Procedure, Revision (1) dated August, 2003.

### **INSPECTION PERSONNEL**

The field inspection was performed by Christopher L. Moore, API-653 Aboveground Tank Inspector.

### **INSPECTION PROCEDURES AND EQUIPMENT**

The inspection procedures follow the recommendations of API-653 as required, including:

1. Tank layout and physical measurements.
2. Visual inspection of the Roof, Shell, Bottom, Structural and Accessories.
3. A visual inspection of the site and the tank exterior surface was performed, checking for: proper drainage, leaks, shell distortions, signs of settlement, corrosion, and condition of the foundation, coatings, accessories, and appurtenances.
4. Ultrasonic Thickness Measurements (UTM's) were taken on the nozzles, shell, and roof. UTM's were taken with an Olympus MG2-XT instrument operating on a dual transducer, "pulse echo" technique with "coating eliminator" software. The instrument calibration was verified before and after the testing was performed.
5. Color photographs were taken on the tank exterior and interior of all essential structures, appurtenances and deficiencies.

## ENGINEERING EVALUATION EVALUATION STANDARDS

1. API Standards
2. Florida DEP Rule 62-762
3. *Tank Engineering And Management Consultants, Inc.*, Standards

## ENGINEERING PERSONNEL & QUALIFICATIONS

1. An evaluation of the tank structure in order to determine the suitability of continued service is performed by personnel experienced in the design and construction of Aboveground Storage Tanks.
2. Victor G. Garaycochea, P.E., Florida Professional Engineer License No. 71208.

## EVALUATION PROCEDURES

The engineering evaluation follows the recommendations of API-653 including:

1. Internal corrosion due to the product stored or water bottoms.
2. External corrosion due to environmental exposure.
3. Stress levels and allowable stress levels.
4. Properties of the stored product such as specific gravity, temperature, and corrosively.
5. Metal design temperatures at the service location of the tank.
6. External roof live load, wind, and seismic loading.
7. Tank foundation, soil and settlement conditions.
8. Chemical analysis and mechanical properties of the materials of construction.
9. Distortions of the existing tank.
10. Operating conditions such as filling/emptying rates and frequency.

## TANK HISTORY

Tank No. 552 was originally built at another site and was cut down and re-erected at International Petroleum in 1989. It is 50' in diameter and 34' in height. Product is limited by the shell height to 34' -0" nominal height. The nominal liquid storage capacity is 12,000 barrels. This tank has a flat bottom and a single column supported fixed cone roof. TEAM performed an Out-of-Service Baseline Inspection on this tank in October 1996, and an In-Service Inspections in June 2002 and 2007.

## STRUCTURE DESCRIPTION

The following information was furnished to us or observed:

<b>Manufacturer:</b>	Unknown
<b>Year Re-constructed:</b>	1989
<b>Capacity:</b>	12,000 BBL Nominal
<b>Tank Diameter:</b>	50' -0"
<b>Tank Height:</b>	34'
<b>No. Shell Courses:</b>	6
<b>Rim Angle:</b>	2 1/2" x 2 1/2" x 3/8" Angle Out

Type Floor:	1/4" Lap Welded Plate
Type Fixed Roof:	Single Column Supported Cone/Lap Welded Plate
Material:	Unknown-Carbon Steel
Design:	Unknown
Specific Gravity:	Unknown
No. of Columns:	1
No. of Rafters:	24
Insulation:	None
Product Stored:	No.5 Fuel Oil

## **INSPECTION OBSERVATIONS**

### **Tank Shell**

UTM's were taken on the tank shell at five readings per plate on the bottom course and three readings per course on the upper courses. All readings are similar to those taken at the last inspection. This tank was originally built at another site and was cut down and re-erected at this site in 1989. The cuts were made at the original weld seams and the plates were butt welded together again. Shell plate peaking, banding, buckling and flat spots are apparent, as is common with a re-erected tank. Although unsightly, these deformities should not affect the structural integrity of the tank.

### **Roof/Structural**

Ultrasonic Thickness Measurements (UTM's) were taken on the roof. The 2007 roof thickness ranged from 0.208" to 0.248" with an average of 0.230". The roof plate thicknesses taken during this inspection ranged from 0.189" to 0.227" with an average of 0.206". It appears that the roof has suffered some metal loss, and should be monitored. There are some areas of corrosion present on the rim angle. The roof appears to be in fair overall condition.

### **Accessories**

See the attached shell and roof layouts attached to this report for a schedule and locations of all attached appurtenances.

All accessories were found to be in good condition.

### **Foundation and Site**

The tank rests on a concrete slab foundation. An elevation survey was performed on this tank around the exterior. The results of the survey are shown on the attached chart entitled "Perimeter Elevations". The elevations were analyzed and found to be within the limits of API-653.

### **Coating Condition**

The exterior coating is in fair overall condition. Corrosion was found on the rim angle of the tank. This corrosion should be mitigated to prevent further metal loss. The roof coating is in poor condition. The roof should be recoated in the next two to three years.

## ENGINEERING EVALUATION

### Tank Shell Design Analysis

Since original information is unavailable, we must assume the lowest grade of steel was used, which is A-283 Gr. C. As presented in API Standard 653, an allowable stress of 23,595 pounds per square inch (psi) for tank courses 1 and 2 allowable stress of 25,960 psi for tank courses 3 through 6 and a joint efficiency of 85% (.85) was used in the following formula to calculate the minimal required shell thickness for each shell course.

$$t_{\min} = \frac{(2.6)(D)G}{SE}$$

Where:

- $t_{\min}$  = Shell Thickness
- $h$  = Datum Height to bottom of ring
- $S$  = Allowable Stress per API-653 (23,595 psi Course 1-2, 25,960 psi Course 3-5)
- $D$  = Nominal Tank Diameter (50 feet)
- $G$  = Specific Gravity (1.0)
- $E$  = Joint Efficiency (85%)

The results of the tank shell design analysis are presented below.

### SHELL DESIGN DATA

Shell Course No.	Shell course Height (inches)	Datum Height (feet) (h)	Original Plate Material	API-653 Min. Thick. (inches) (E=0.85)	2002 Average Measured Thickness (inches)	2007 Average Measured Thickness (inches)	2012 Average Measured Thickness (inches)
1 Btm	72	34	Unknown	0.220	0.250	0.249	0.252
2	72	28	Unknown	0.181	0.249	0.252	0.255
3	72	22	Unknown	0.129	0.242	0.242	0.245
4	72	16	Unknown	0.100*	0.240	0.243	0.239
5	72	10	Unknown	0.100*	0.242	0.241	0.242
6 Top	48	4	Unknown	0.100*	0.237	0.237	0.245

\*API-653 Standard requires no shell course be less than 0.100"

As presented above, this tank exceeds the API Standard 653 minimum allowable shell thickness for all courses.

### Roof Analysis

No external pitting or corrosion was found on the roof plates during this inspection. The tank has experienced some thinning since the last inspection. This roof appears to be in fair condition.

#### Dimensional Tolerance Analysis

No significant non-conformance's to API Construction Standards were found.

#### Brittle Fracture Analysis

This tank has demonstrated the ability to withstand the combined effects of maximum liquid level and lowest operating temperatures without failing for at least twenty-three (23) years. Based on the location of the tank in Central Florida, the risk of failure due to brittle fracture with continued service is minimal.

Further evaluation is required if there is a change in service, or if additional repairs/alterations are made that do not meet the requirements of API-653, or if deterioration of the tank has occurred.

#### Tank Settlement Analysis

Elevation readings were taken around the tank perimeter. The tank elevation readings are within the range of API-653 App B requirements. See attached elevation charts for more detail.

#### CONCLUSION

This tank meets the requirements of API-653 "Suitability for Service" and State of Florida Department of Environmental Protection Rule 62-762. **This tank is suitable for continued service.**

The next Out of Service inspection required by API 653 and the FDEP will be required at or prior to January 2016. The API 653 and FDEP require the Owner to inspect the tank monthly. If the tank is taken out of service at any time prior to the next required Out of Service Inspection, an Out of Service Inspection must be performed.

### RECOMMENDATIONS

#### Mandatory Repairs/Renovations Required To Meet API-653 and/or FDEP Requirements:

1. None at this time.

#### Non-Mandatory Recommendations:

1. Mitigate corrosion on chime and rim angle.
2. Blast and Recoat the roof.

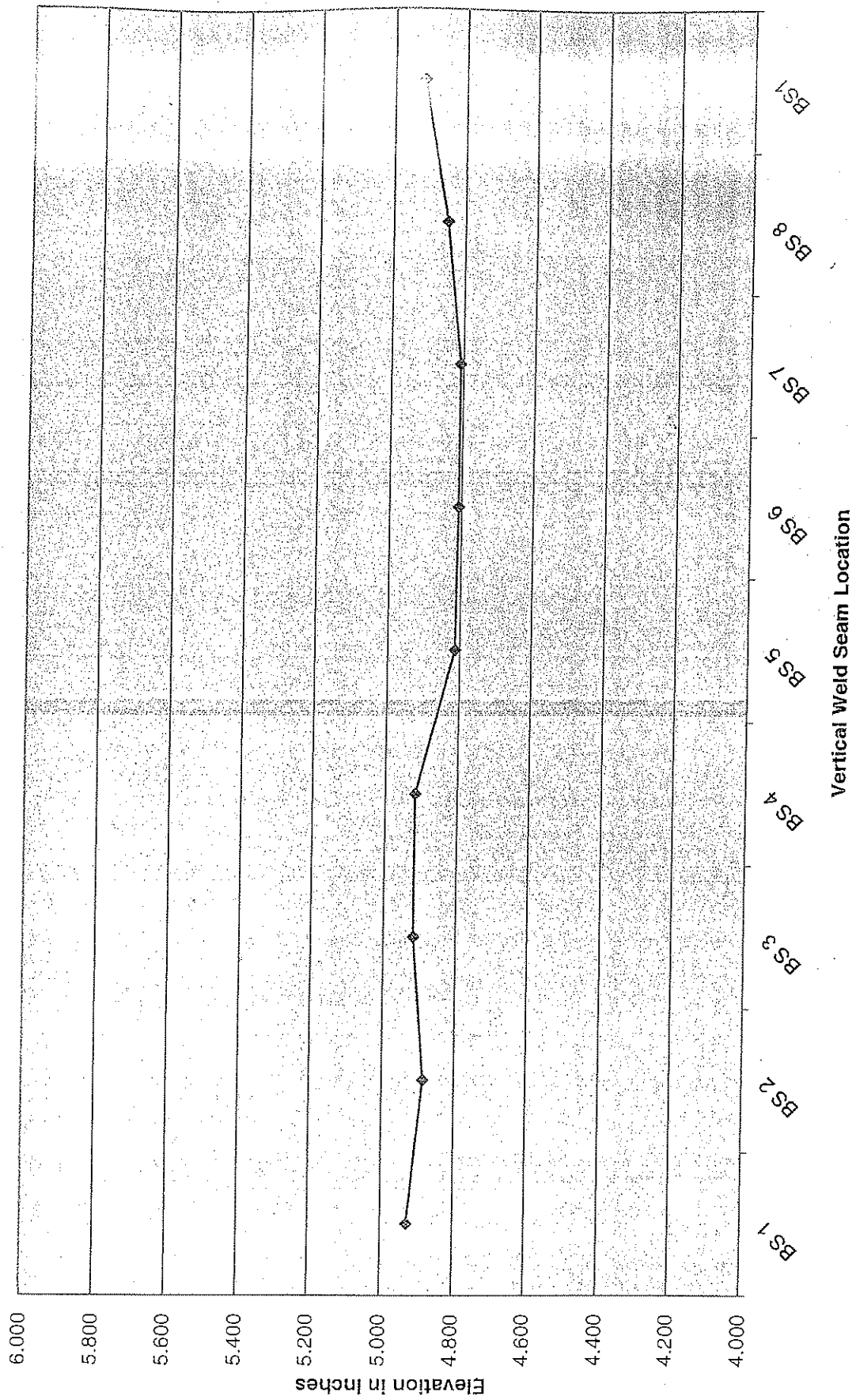
This report of In-Service Inspection should be placed in the notebook provided with the Baseline inspection.

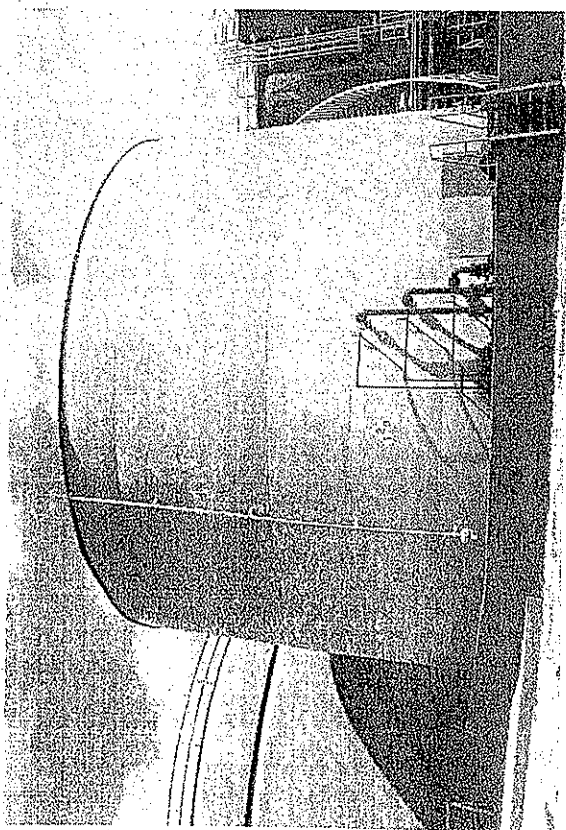
We appreciate the opportunity of performing this inspection service for you. Should you have any questions regarding the information contained herein, please do not hesitate to contact us.



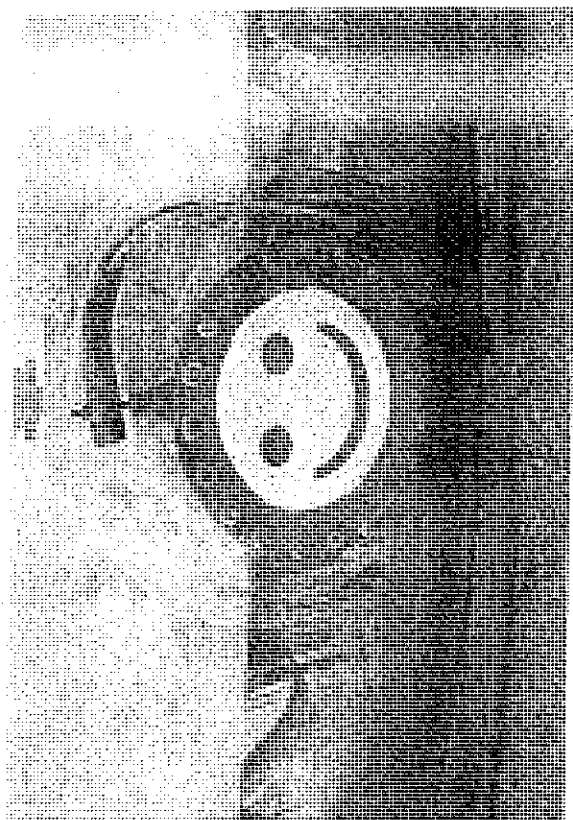
-END OF REPORT -

Perimeter Elevation Readings  
Tank 552

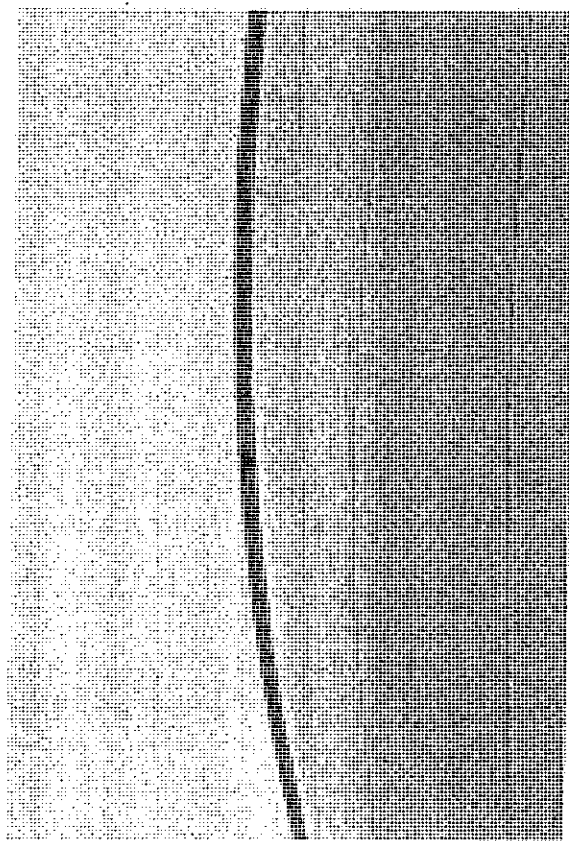




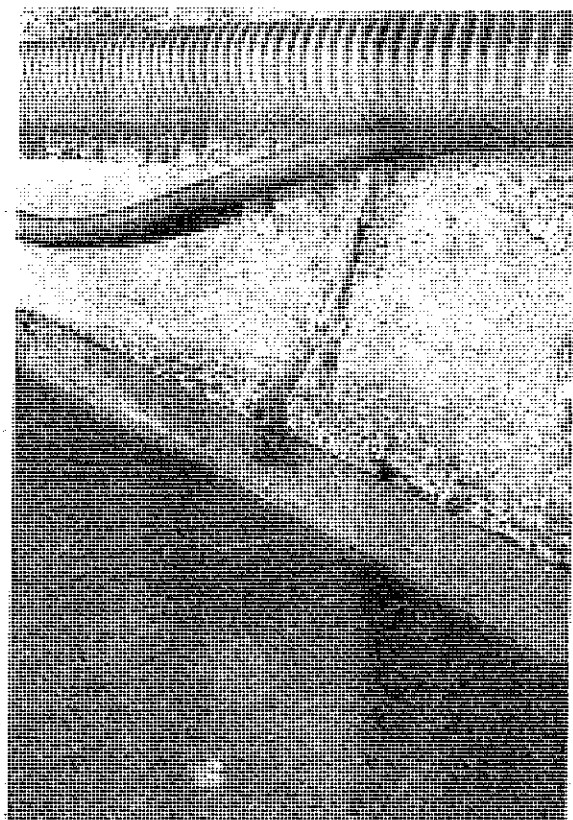
1. Tank Overall.



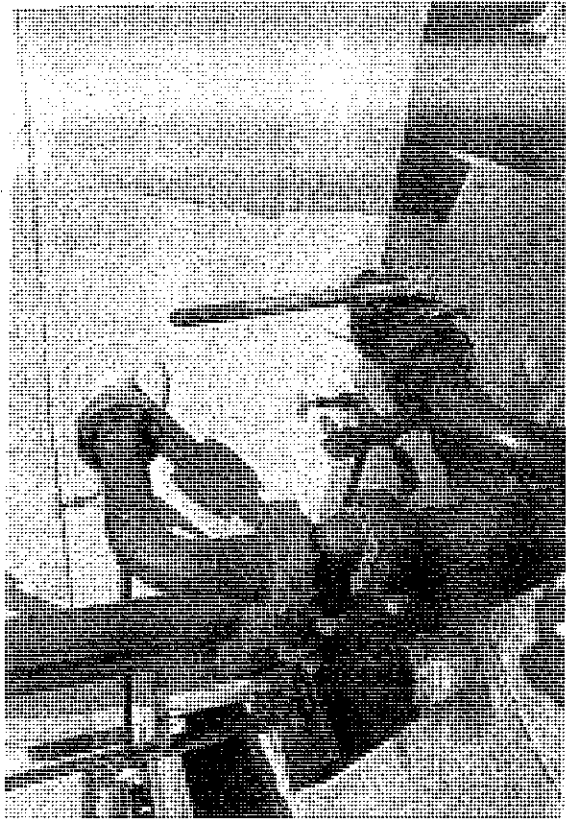
2. Tank Manway.



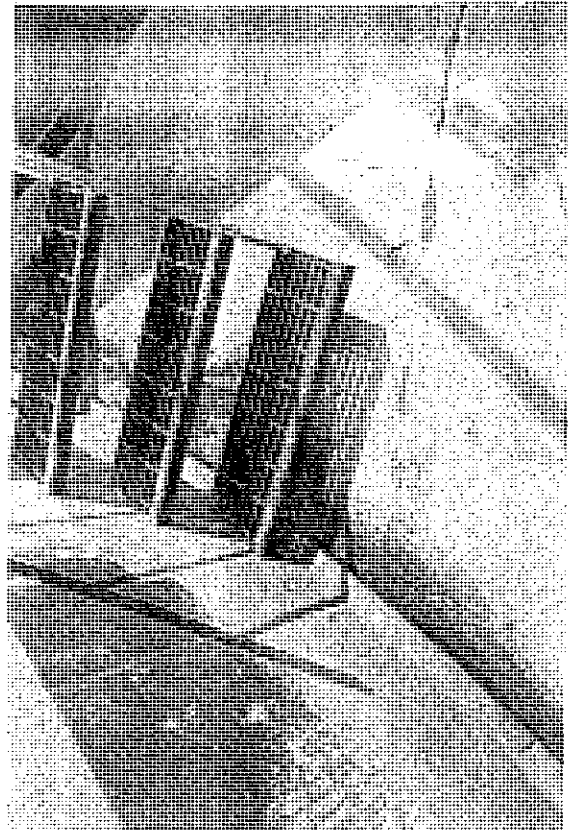
3. Corrosion on Rim Angle.



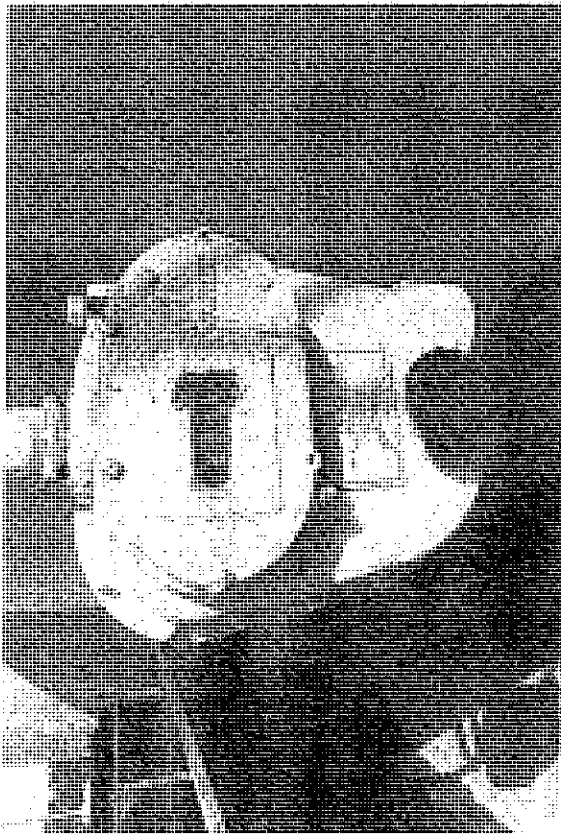
4. Tank Ground.



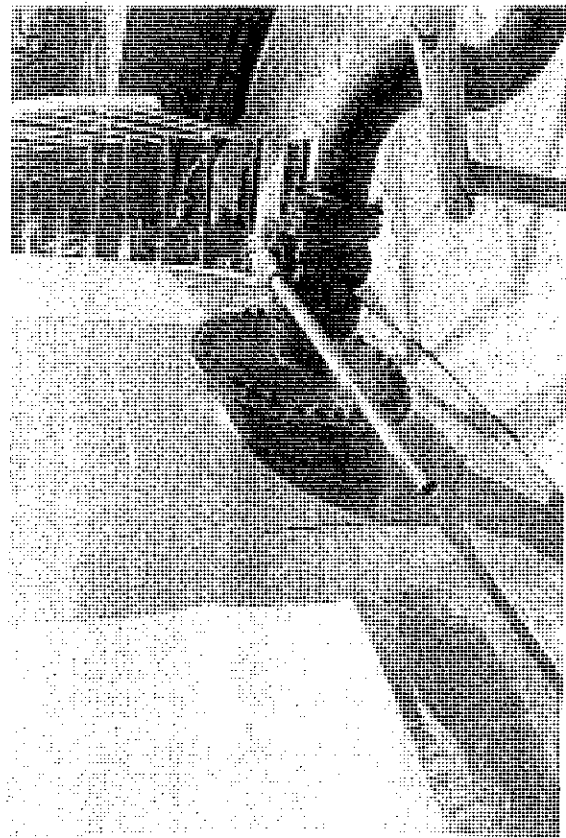
6. Tank Nozzles.



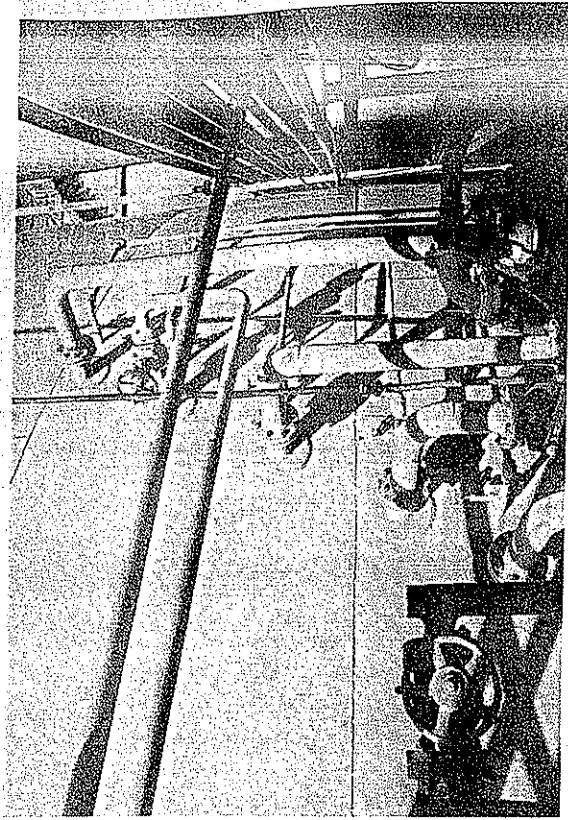
8. Base of Stairs.



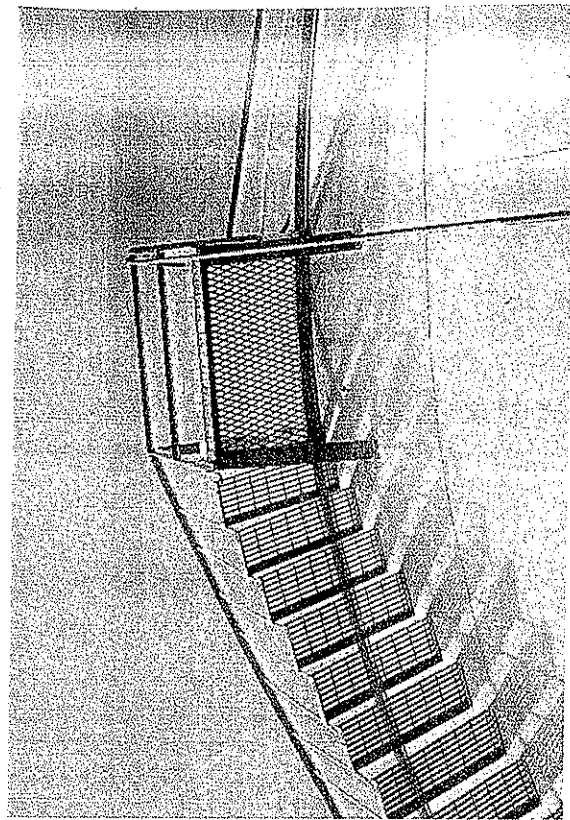
5. Liquid Level Indicator.



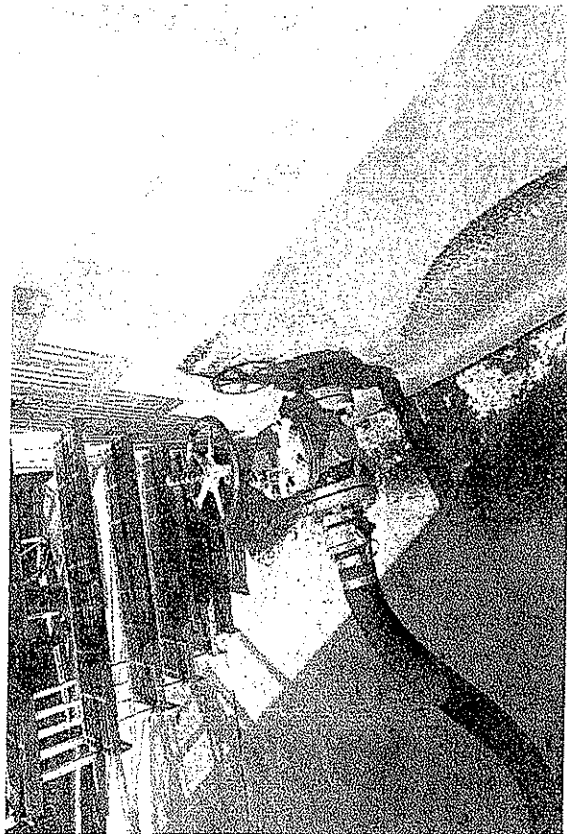
7. Tank Manway.



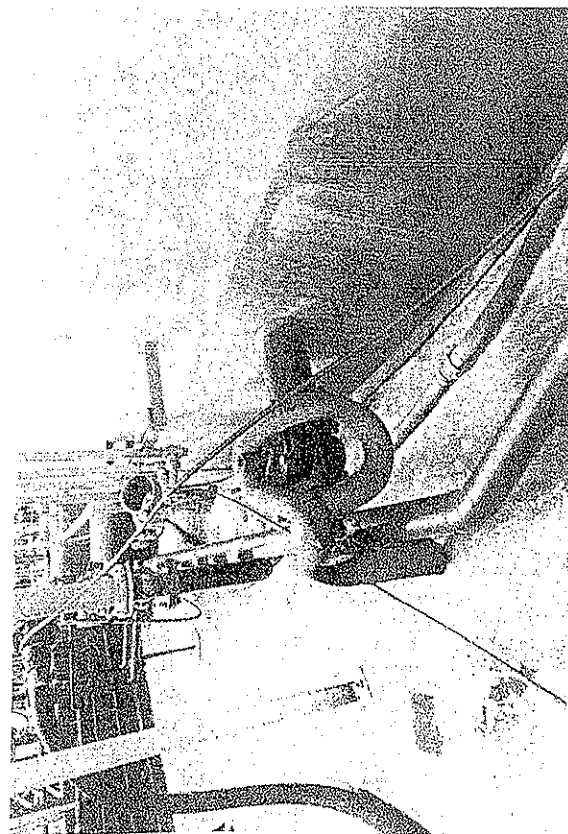
10. Tank Nozzles.



12. Top of Stairs.

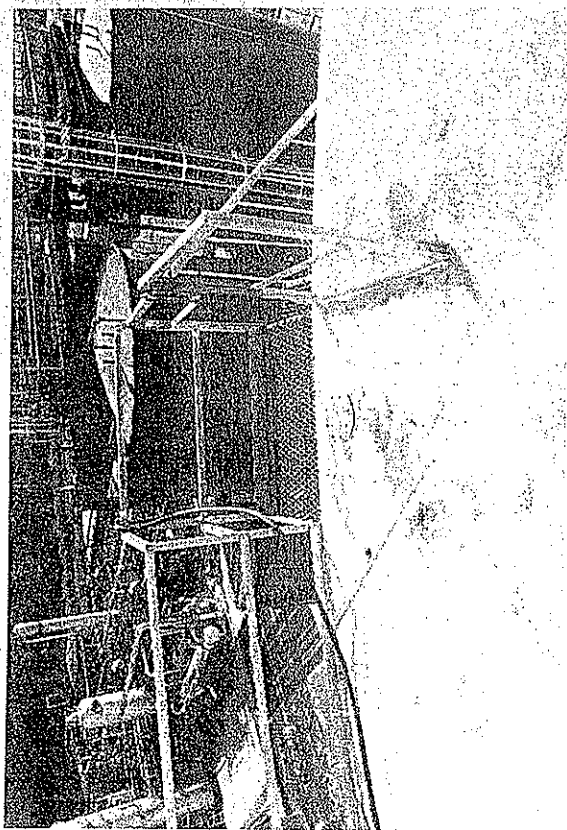


9. Tank Nozzle.

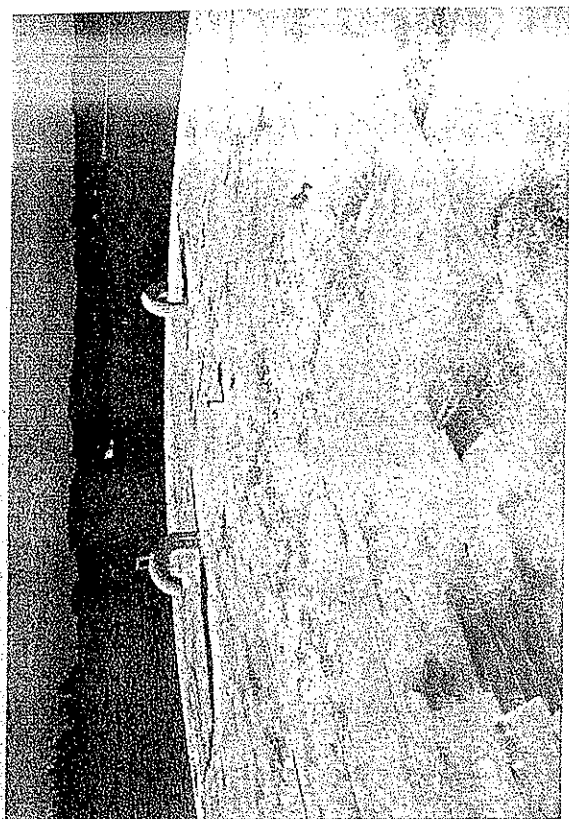


11. Tank Nozzle.

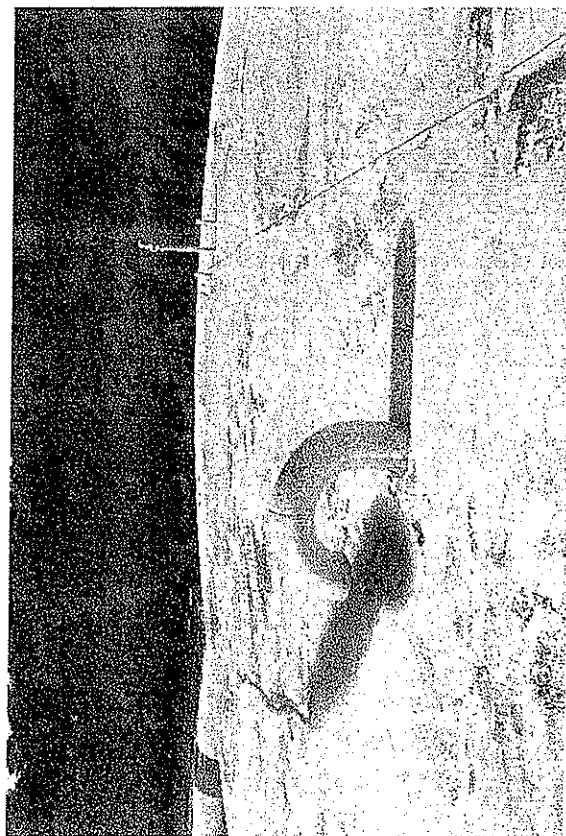




13. Top of Stairs.



14. Roof Overall.



15. Roof Vent and Isolated Area of Corrosion.



16. Roof Manway and Blind Nozzle.



**USED OIL PROCESSING PERMIT APPLICATION**

PLANT CITY FACILITY

FCC ENVIRONMENTAL, LLC

PLANT CITY, FLORIDA

JUNE 2013

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USED OIL PROCESSING PERMIT APPLICATION  
PLANT CITY FACILITY

FCC ENVIRONMENTAL, LLC  
PLANT CITY, FLORIDA

JUNE 2013

PREPARED BY:  
SCOTT CRANDALL, P.E.

APPROVED BY:  
ANGELO POUSA, AREA MANAGER





**FCC Environmental, LLC**  
**PLANT CITY, FLORIDA**

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