

### Petroleum Recovery, Used Oil & Environmental Services

October 7, 2013

Florida Department of Environmental Protection Hazardous Waste Program and permitting Bob Martinez Center 2600 Blair stone Road Tallahassee, Florida 32399-2400 Bheem Kothur, P.E. III

RE: World Petroleum Corp

EPA I.D. No: FLD 980 709 075

Permit Number: 54228-HO-005/54228-SO-006

Used Oil and Material Processing Facility Permit Application

**Notice of Deficiency** 

Dear Mr. Kothur,

Pursuant to our phone conversation on Friday October 4, 2013, please find attached the following.

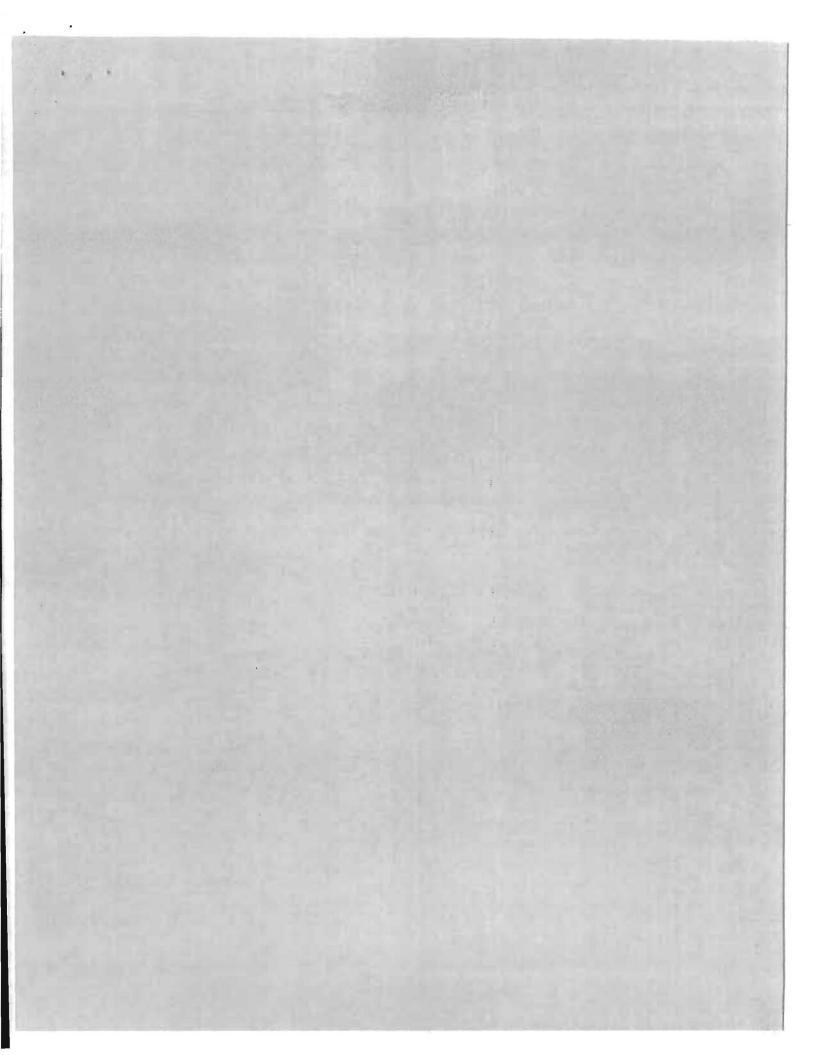
- I. Correspondences between Broward County Pollution, Prevention and Air Quality Division, Town of Davie Fire Department and Broward County Storage Tank Section.
- II. World Petroleum Corp tanks will be tested in accordance with API 653 procedures.
- III. Site Plan pages numbered (#12 & #45).
- IV. World Petroleum Corp SPCC Plan page #54 lists the location of the emergency response equipment and the quantities.
- V. See enclosed employee training by position and list of classes.
- VI. Page #51 of World Petroleum Corp Used Oil application has the FDEP Southeast District correct address.
- VII. Page #70 typo correction (rinsing not rising).
- VIII. Page #70 correct rules citation 62-762 (aboveground storage tanks) and not 62-761 (underground storage tanks).

- IX. Page #76 Regulatory and Economic Resources (Environmental Resources Management), replaces DERM.
- X. Hazwoper replaces Hazwopper in the Solid Waste application (page #5).
- XI. Breakdown of roll-off and drums in the solid processing area **Solid Waste** application (page #6).
- XII. Listing of analytes as part of the Solid Waste application (page #8)

Sincerely,

Philip Pierre-Louis General Manager

World Petroleum Corp



### Jones Ecosystem Management

Mr. Alfred Reid
Storage Tank Section
Broward County Pollution Prevention, Remediation and Air Quality Division
1 North University Drive
Suite 102
Plantation, Florida 33324

December 6, 2009

RE: Revised World Petroleum Storage Tank Application

Dear Mr. Reid:

Per our recent conversations, and your e-mail dated December 9, 2009, World Petroleum Corp. (WPC) has revised its plans for the used oil storage tank farm. Please find attached a revised Storage Tank Application form reflecting the proposed revisions (Attachment 1). This application includes the following changes from the storage tank facilities which were already in use:

- Two each 4,000 gallon tanks and two each 8,000 gallon tanks (designated as 8-F, 8-B, 4-F, and 4-B on the diagram titled PAST ARRANGEMENT) have been removed and replaced with two each 20,000 gallon tanks (designated as #5 and #6 on the diagram titled FUTURE ARRANGEMENT). The old tanks were cleaned and sent to a scrap metal recycler. A Closure Assessment Report is attached to this letter (Attachment 2).
- 2. Two each 10,000 gallon tanks (designated as 10-F and 10-B on the diagram titled PRESENT ARRANGEMENT) will be closed and removed. These tanks are noted as Closed on the Storage Tank Application form.
- 3. Tank anchor details, wind loading, and construction details for the containment walls are depicted in the attached drawings. (Drawings A1.1, A1.2, A1.3, A2.1, and A3.1, prepared by Engel and Associates.
- 4. Repairs to the cracks noted during the site inspection will be made using grout or an epoxy resin. Choice of material will depend upon the location and size of the cracks. Any material chosen for repairs will be resistant to the contents of the tank farm.
- 5. Secondary containment will be provided for the 1,000 gallon tank supplying fuel to the process heating tank. Details are included in Drawing A1.1.
- 6. Secondary containment will be provided around the Process Heating Tank. Details of the containment construction are shown in Drawing A2.1.
- 7. A "secondary containment hump" will be established around the truck unloading area, as shown in Drawing A2.1.

Phone (479) 353-1368

e-mail: johnmjonespe@sbcglobal.net

Drawing A2.1 depicts the overall tank farm layout, including the aforementioned removal of 4 tanks (capacity decrease of 24,000 gallons), the installation of two tanks (capacity increase of 40,000 gallons), and the proposed closure and removal of two additional tanks (capacity decrease of 20,000 gallons). Please find attached the Storage Tank Summary, which confirms that the total capacity of 191,700 gallons is less than the 195,700 gallons capacity recognized by Broward County.

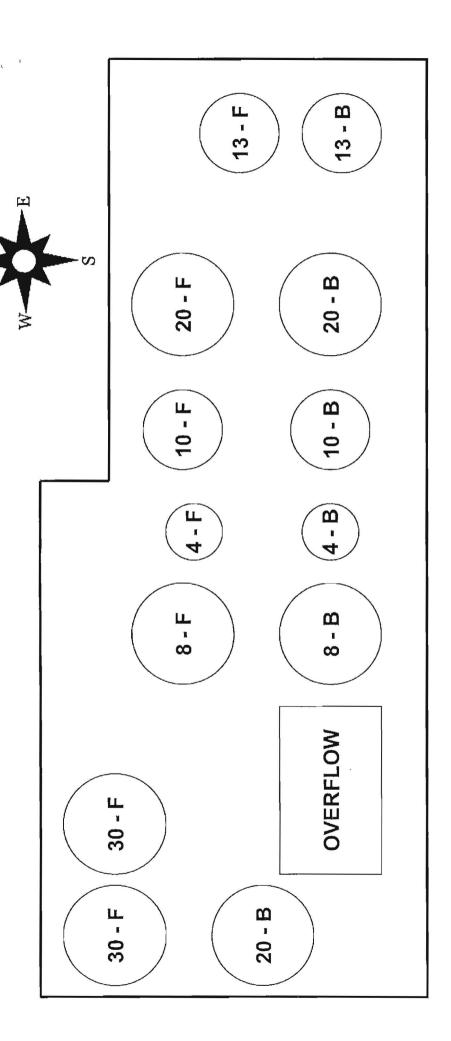
As-built drawings, including piping, will be submitted following the construction activities. All piping will be schedule 40 Carbon Steel.

WPC is committed to compliance with all environmental regulations and standards. We appreciate the PPRAQ's assistance and prompt review of the attached information. If you need any additional information, please contact me at (479) 353-1368.

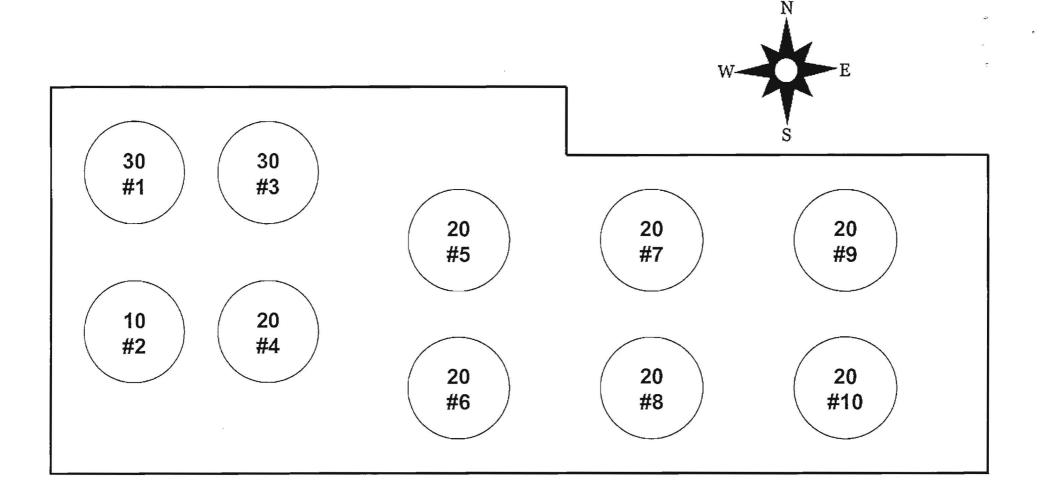
Sincerely,

John M. Jones, P.E. Florida Registration 50227

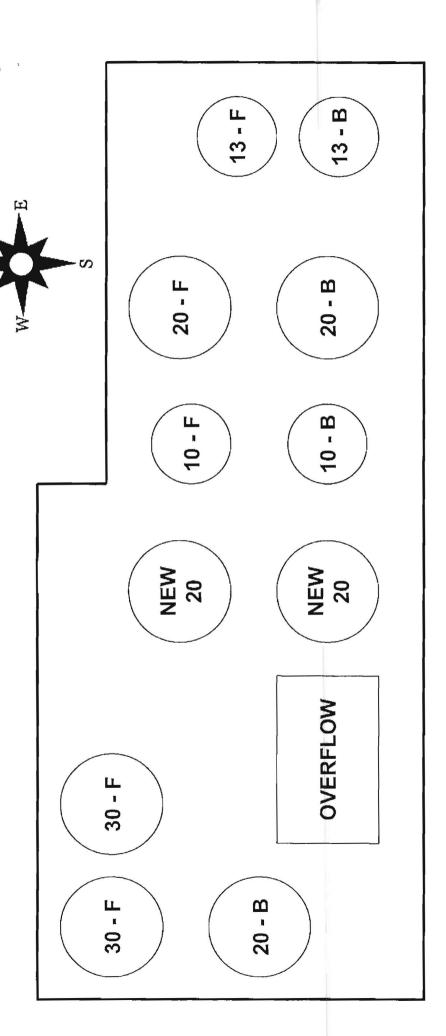
cc: Mr. Didier DuPuy- Broward County Mr. Eric Miranda



# PAST ARRANGEMENT



# **FUTURE ARRANGEMENT**



# PRESENT ARRANGEMENT

### Limited Closure Assessment Report

### World Petroleum Corporation

3650 SW 47th Avenue

Davie, Florida 33314

World Petroleum (Facility ID # 9300963) closed four above-ground tanks that had been used to store used oil and oily water. The four tanks are designated as B-4, F-4 (4,000 gallons capacity each), B-8 and F-8 (8,000 gallons capacity each) on the attached Florida Department of Environmental Protection summary sheet. The tanks were cleaned and solids removed prior to the transfer of ownership from Petroleum Management Inc. to World Petroleum Corporation in December, 2007. The tanks have been used intermittently since WPC assumed ownership of the facility.

The contents of the tanks were processed and the tanks opened and inspected. No solid residues were found in the tanks.

The interior of the tanks were rinsed with water. The rinsewater was managed as oily water by WPC.

The tanks were then removed from the secondary containment area and transported to a scrap metal recycler. The shipping document for transport of the tanks and confirmation that the metal was recycled is attached. Visual inspection of the secondary containment area around the tanks following their removal revealed no evidence of leakage. Since the tanks were operated inside concrete secondary containment, there was no release of pollutants to the ground. Accordingly, there is no need for further assessment.

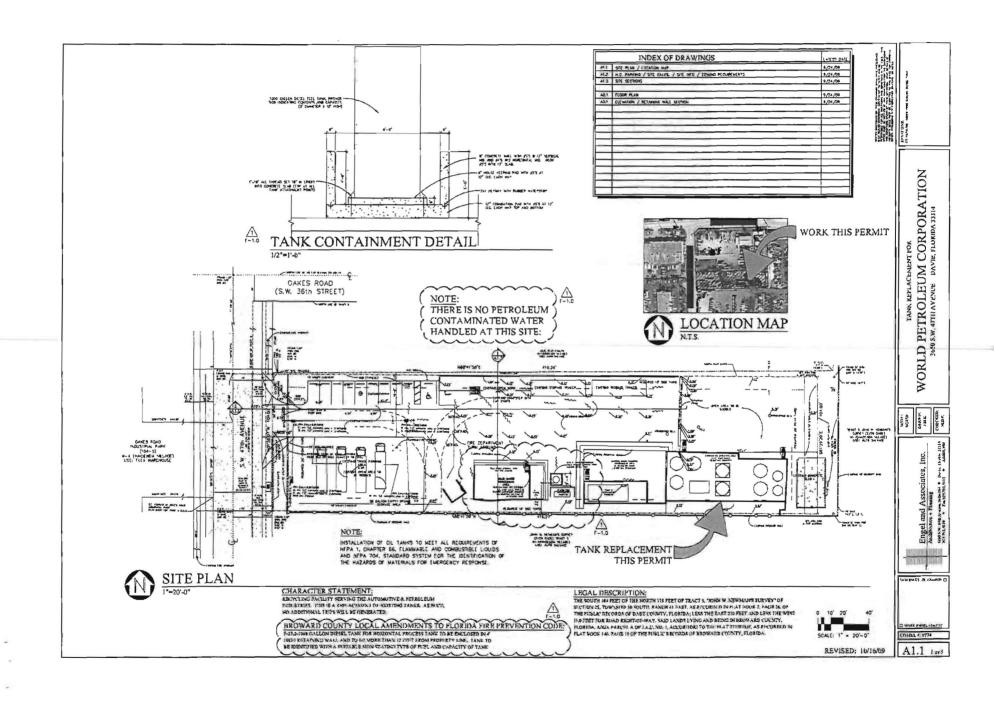
I certify that the tanks were closed in accordance with 62-762.800, F.A.C.

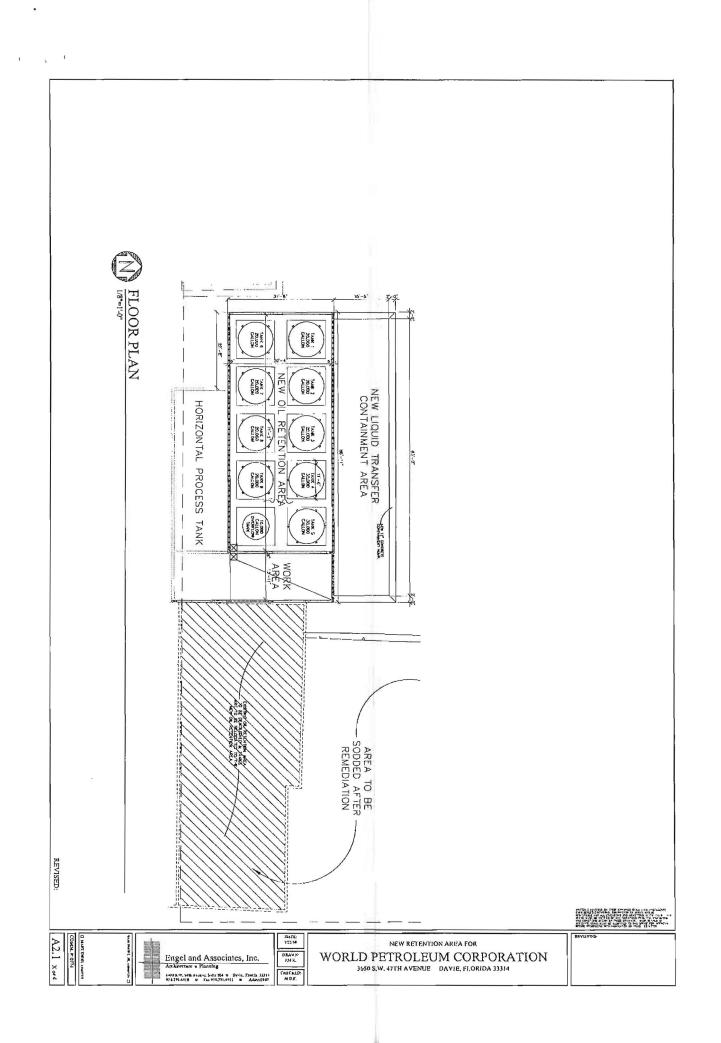
John M. Jones

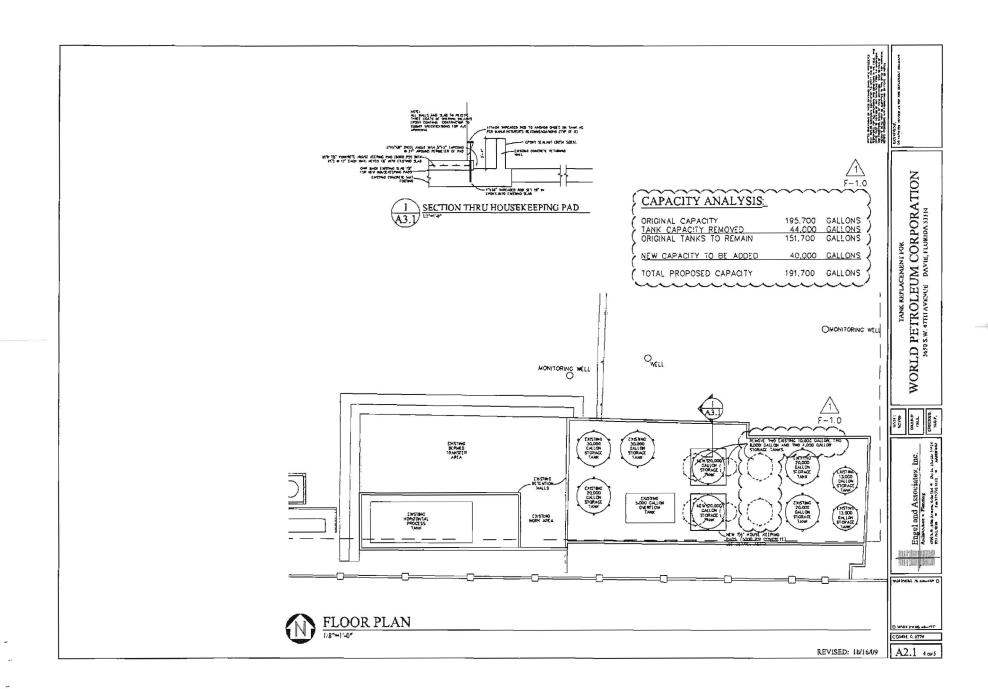
Jones Ecosystem Management

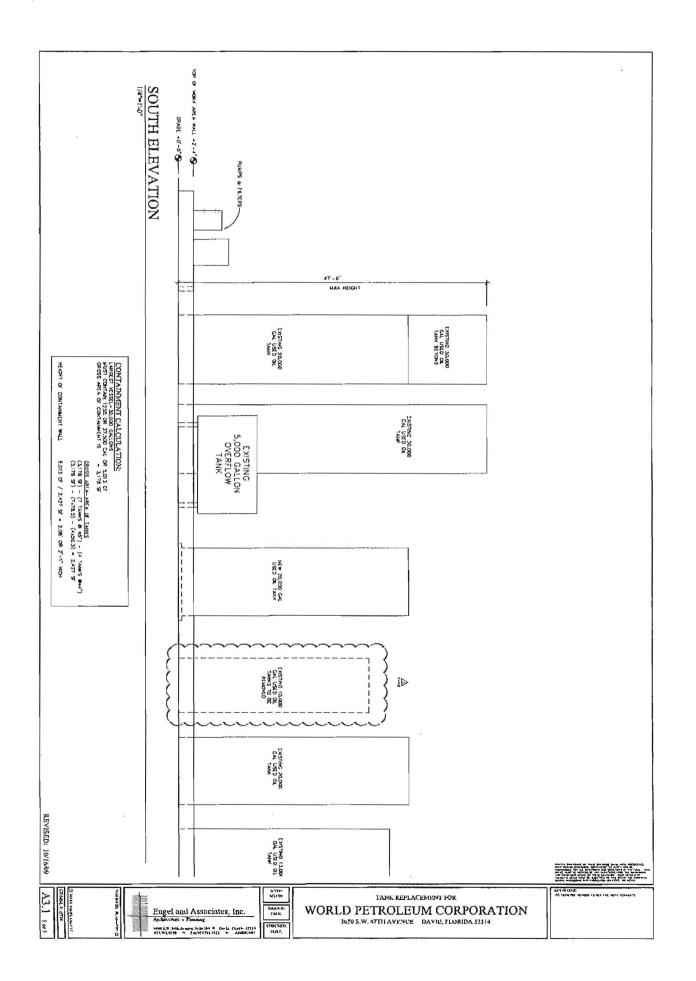
Professional Engineer Registration Number 50227

e-mail: johnmjonespe@sbcglobal.net



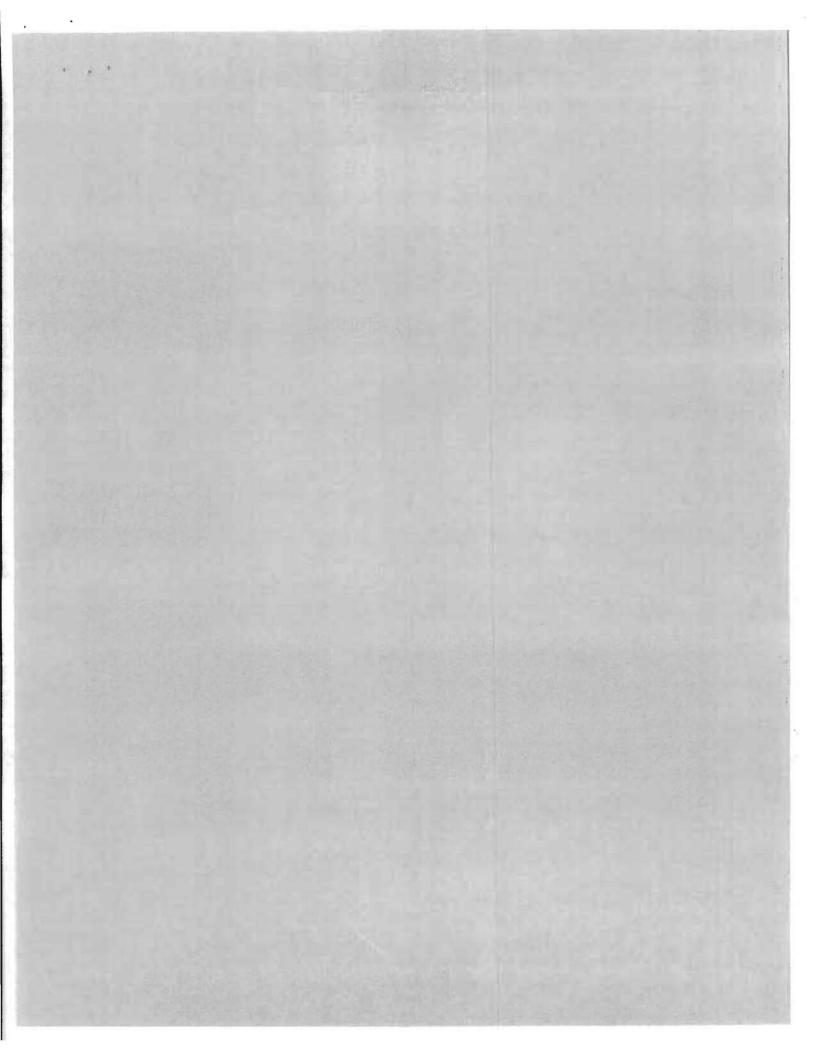






### OIL STORAGE LOCATIONS

EQUIPMENT/	TYPE	CAPACITY	Contents
LOCATIONS		(gallons)	
Overflow	Above-Ground	4700	Waste Oil
F-4	Above-Ground	4000	Waste Oil
B-4	Above-Ground	4000	Waste Oil
B-8	Above-Ground	8000	Waste Oil
F-8	Above-Ground	8000	Waste Oil
F-10	Above-Ground	10000	Misc. Petrol-Base
B-10	Above-Ground	10000	Waste Oil
F-13	Above-Ground	13000	Waste Oil
B-13	Above-Ground	13000	Waste Oil
B-20	Above-Ground	20000	Waste Oil
F-20	Above-Ground	20000	Waste Oil
F-30	Above-Ground	30000	Misc. Petrol-Base
B-20	Above-Ground	20000	Waste Oil
F-30	Above-Ground	20000	Waste Oil
	TOTAL	194,700	



	STORAGE TAN	K SCHED	ULE				
MARK	CAPACITY (GALLONS)	CONSTRUCTION	CHAMETER	NEIGHT	THICKNESS	INSTALLED DATE	CONTENT
T-1	30,000	STEEL	או מפו	360 IN	1/4 INCH	SEPT-94	ONLY WATER/PROCESS ON /PCW
T-2	6,000	STEEL	120 IN	156 IN	1/4 NCH	TN-83	ANTIFREEZE
T-3	30,000	STEEL	180 IN	380 N	1/4 INCH	SEPT-94	DILY WATER/PROCESS CA
T4	20,000	STEEL	160 IN	240 IN	1/4 INCH	MAR-09	O'LY WATER/PROCESS OIL
T-5	20,000	STEEL	160 IN	240 IN	1/4 INCH	MAR-09	OLY WATER/PROCESS OF
T-6	20,000	STEEL	160 IN	240 IN	1/4 INCH	OCT-09	DILY WATER/PROCESS OFL
T-7	20,000	STEEL	160 IN	240 IN	1/4 INCH	OCT-D9	DILY WATER/PROCESS OIL
T-8	20,000	STEEL	160 W	240 IN	1/4 INCH	JUN-94	ONLY WATER/PROCESS OIL
T-9	20,000	STEEL	160 W	240 M	1/4 INCH	JAN-B3	OILY WATER/PROCESS OIL
T-10	20,000	STEEL	160 M	240 N	1/4 INCH	JAN-B3	OILY WATER/PROCESS OIL
PROCESSING TANK	30,000	STEEL	180 EV	360 N	1/4 INCH	E8-MAL	OILY WATER/PROCESS OIL
TOTAL	238,000 GALL	ONS					



LOCATION MAP

5' CHAIN UNK FENCE-5' CHAIN LINK FENCE-N88'41'58'E 419.24 PRECIAST Ġ 10' MASONRY WALL MPSTER WITH DUTDOOR WORK AREA UNDER SHADE CANOPY 104,00 104.00 SLIDING SECURITY ENTRANCE GATES EVACUATION ROUTE EVACUATION ROUTE EVACUATION ROUTE -FIRE HYDRANT LIQUID TRANSFER CONTAINMENT AREA SOLID PROCESSING/DRUM STORAGE AREA MACTIVE WATER TREATMENT PLANT G, E PROCESS TANK E C.B. S88'41'58"W 419.27 9 PRECAST WALL PRECAST WALL

 $\frac{\text{SITE PLAN}}{N,T.S}$ 

LEGAL DESCRIPTION:
THE SOUTH IN FEET OF THE NORTH 375 FEET OF TRACT 5, 'JULIA' W, NEWMAN'S SURVEY' OF
SECTION 33, 'DOWNSIMP'S SOUTH, RANGE 31 EAST, AS RECORDED IN PLAT BOOK 2, NAGE 24, OF
THE PUBLIC SECONDS OF DADE COUNTY, FLORIDA; LESS THE EAST 110 FEET AND LESS THE WEST
IN SPET FOR ROAD BUILT, "ANY, "AND LANDS LYHING AND SIGNS IN BROWARD COUNTY,
FLORIDA, AVIAN PARCEL A OF LAG, NO. 1, ACCORDING TO THE PLAT THEREOF, AS RECORDED IN
FLAT BOOK 144, ANGEL BOY THE SUILLE RECORDED OF BROWARD COUNTY, FLORIDA.

CHARACTER STATEMENT:
RECYCLING FACILITY SERVING THE
AUTOMOTIVE & FETROLEUM INDUSTRIES

REVISED:

A1.1 1071

A CANADA CANADA

PROCESS YARD FOR WORLD PETROLEUM CORPORATION 3650 S.W. 47TH AVENUE DAVIE, FLORIDA 33314

DATE POUR ALAL

Engel and Associates, Inc.
Architectus # Plancing
1001511-840 Architectus # Date Inch.
1001511-840 Architectus # Salvanton # Automen

THIS SITE

12

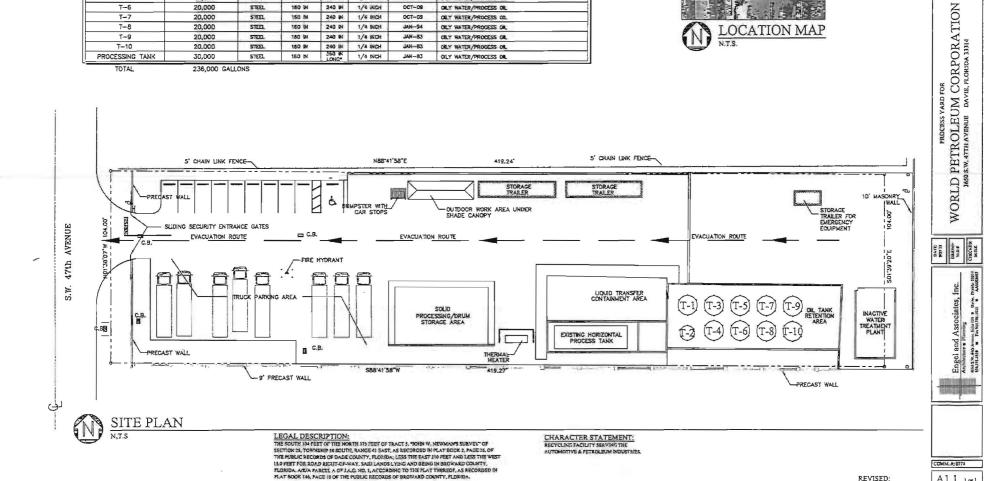
S.W. 47th AVENUE

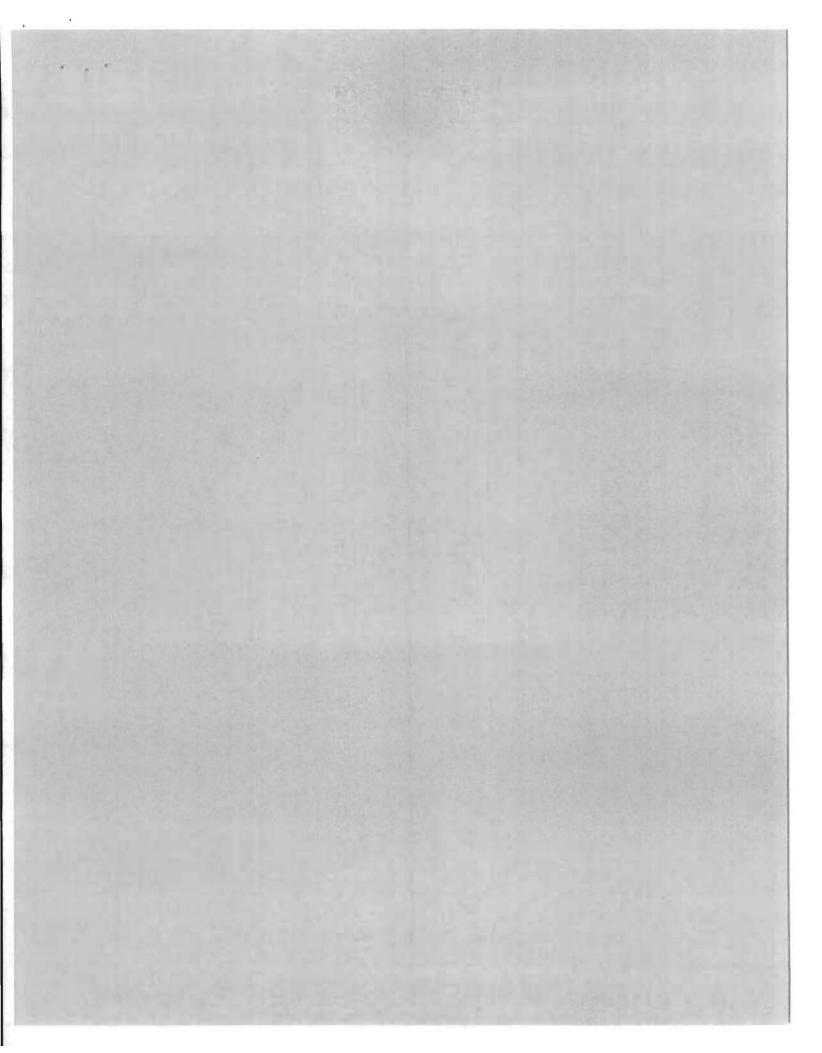
	STORAGE TAN	K SCHED	ULE				
MARK	CAPACITY (GALLONS)	CONSTRUCTION	DIAMETER	HEICHT	THIONNESS	DISTALLED DATE	CONTENT
T-1	30,000	STEEL	160 N	360 IN	1/4 INOH	SEPT-94	ONLY WATER/PROCESS OIL/PCW
T-2	6,000	STEEL	120 IN	156 IN	1/4 INCH	JAN-83	ANTIFREEZE
7-3	30,000	STEEL	160 D	360 IN	1/4 INCH	SEPT-94	OILY WATER/PROCESS OIL
T-4	20,000	ETEL	160 DK	240 W	1/4 INCH	UAR-00	OILY WATER/PROCESS OIL
T-5	20,000	STEEL	180 W	240 IN	1/4 INCH	WAR-09	OLY WATER/PROCESS OIL
T-6	20,000	STEEL	150 W	240 IN	1/4 INCH	OCT-09	OILY WATER/PROCESS OIL
T-7	20,000	STEEL	160 N	240 IN	1/4 INCH	OCT-09	OLLY WATER/PROCESS OfL
T-8	20,000	STEEL	160 W	240 IN	1/4 DICH	JAN-94	OILY WATER/PROCESS OIL
T-9	20,000	STEEL	180 W	240 IN	1/4 INCH	JAN-83	CILY WATER/PROCESS CIL
T-10	20,000	STEEL	150 PM	240 IN	1/4 INCH	TWH-82	OILY WATER/PROCESS OIL
PROCESSING TANK	30,000	STEEL	150 IN	TONG.	1/4 INCH	28-NAT	OLY WATER/PROCESS OIL
TOTAL	236,000 GALL	ONS					



REVISED:

A1.1 1001

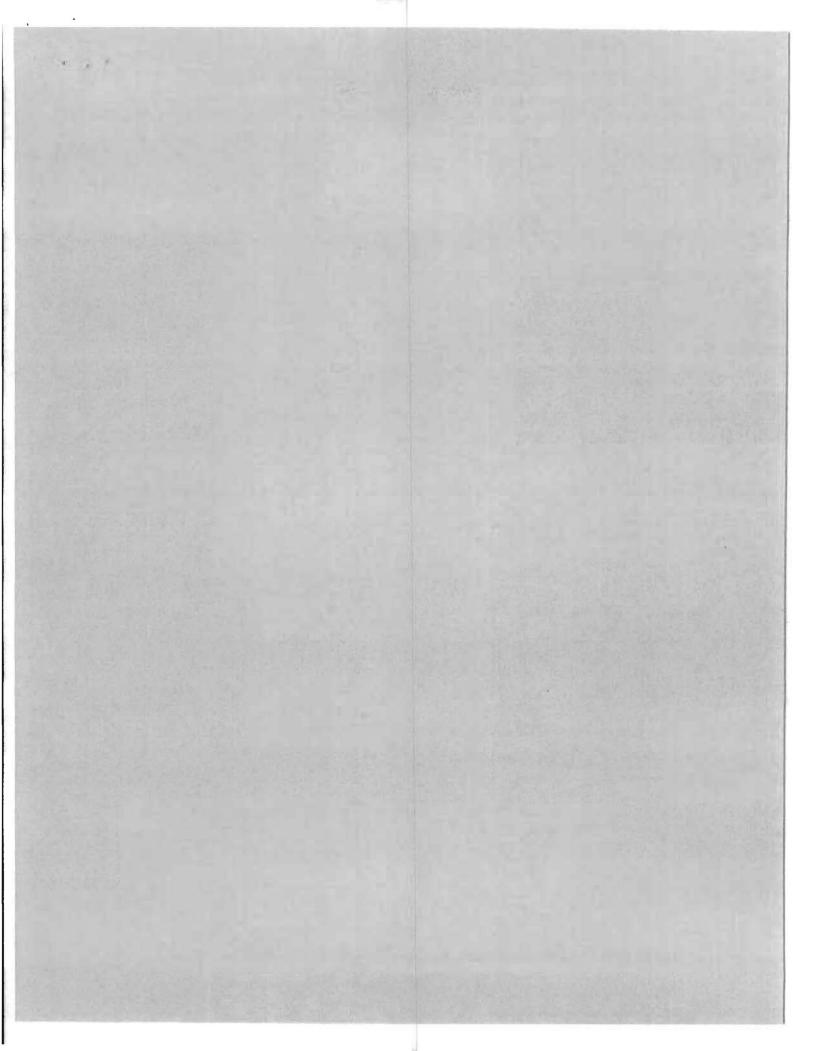




# Appendix J Discharge Response Equipment Inventory

The discharge response equipment inventory is verified during the monthly inspection and must be replenished as needed. The spill trailer is located in the Northeast corner of the facility.

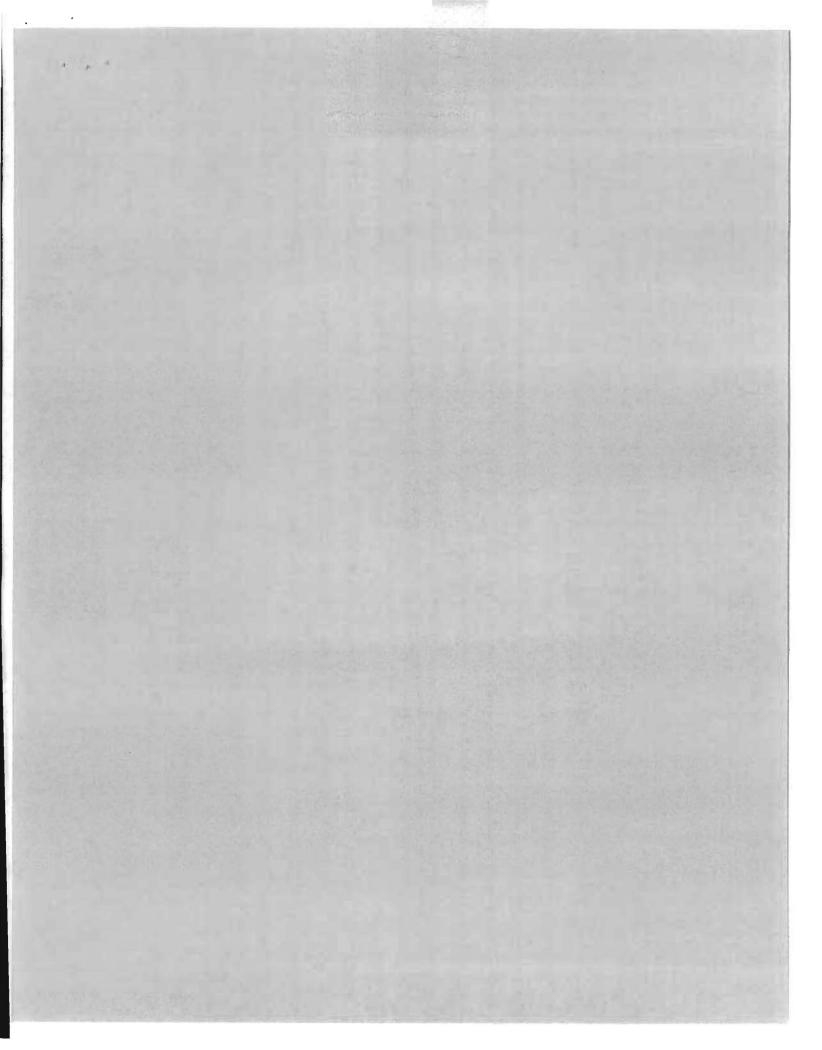
<u>ITEM</u>	Quantity	Location
Empty 55-gallons drums to hold contaminated material	2	Spill Trailer
Loose absorbent material	100 pounds	Spill Trailer
Absorbent pads	3 boxes	Spill Trailer
Nitrile gloves	6 pairs	Spill Trailer
Neoprene gloves	6 pairs	Spill Trailer
Vinyl/PVC pull-on overboots	6 pairs	Spill Trailer
Non-sparking shovels	3	Spill Trailer
Brooms	3	Spill Trailer
Drain seals or mats	2	Spill Trailer
Sand bags	12	Spill Trailer



Name	Position	Hire Date	First Aid/ CPR	Haz Waste Mgmt.	Fire Extinguisher	Shpyard Compete	Drug and Alcohol	ForkLift Operation	8 Hr. Refresher	USDOT Haz. Matı	WPC Orientation
Andrea Miranda	Administration	11/12/2007	12/17/07	12/17/07	12/17/07	x	12/17/07	×	12/17/12	x	11/12/2007
Angela Miranda	Administration	11/11/2008	1/21/08	1/21/08	1/21/08	x	1/21/08	×	12/17/12	×	11/11/2008
Pablo Borghi	Driver	9/22/2010	12/14/10	12/14/10	12/14/10	4/2/11	12/14/10	12/17/12	12/17/12	12/18/12	9/22/2010
Antonio Estrada	Driver	6/8/2007	12/17/07	12/17/07	12/17/07	12/17/12	12/17/07	12/17/12	12/17/12	12/18/12	6/8/2007
James Giglio	Driver	5/1/2012	12/17/12	12/17/12	12/17/12	12/17/12	5/1/12	12/17/12	12/17/12	12/18/12	5/1/2012
Ruben Diaz	Driver	4/22/2012	12/17/12	12/17/12	12/17/12	12/17/12	4/22/12	12/17/12	12/17/12	12/18/12	4/22/2012
Chad Gregory	Plant Ops	7/30/2007	12/17/07	12/17/07	12/17/07	12/17/12	12/17/07	12/17/12	12/17/12	12/18/12	7/30/2007
Chris Northey	Driver	6/8/2009	12/14/10	12/14/10	12/14/10	12/17/12	6/8/09	12/17/12	12/17/12	12/18/12	6/8/2009
Eric Miranda	President	inception	12/17/07	12/17/07	12/17/07	12/17/12	12/17/07	12/17/12	12/17/12	12/18/12	6/22/2002
Luis Paulino	Driver	11/29/2011	2/13/12	2/13/12	2/13/12	12/17/12	11/29/11	12/17/12	12/17/12	12/18/12	11/29/2011
Mark Nickerson	Project Manager	12/10/2007	12/17/07	12/17/07	12/17/07	12/17/12	12/17/07	12/17/12	12/17/12	12/18/12	12/10/2007
Mario Vergara	Supervisor	4/22/2012	12/17/07	12/17/07	12/17/07	12/17/12	12/17/12	12/17/12	12/17/12	12/18/12	4/22/2012
Philip Pierre-Louis	Compliance	3/1/2011	2/13/12	2/13/12	2/13/12	12/17/12	12/17/12	12/17/12	12/17/12	12/18/12	3/1/2011
Sauver Verminal	Driver	1/29/2007	12/17/07	12/17/07	12/17/07	12/17/12	12/17/07	12/17/12	12/17/12	12/18/12	1/29/2007
Roel Castillo	Driver	3/5/2012	12/17/12	12/17/12	12/17/12	12/17/12	3/5/12	12/17/12	12/17/12	12/18/12	3/5/2012
Vickie Miranda	Vice- President	inception	12/17/07	12/17/07	12/17/07	x	12/17/07	x	12/17/12	×	6/22/2002
Tony Madamba	Plant Ops	7/7/2011	2/13/12	2/13/12	2/13/12	x	7/7/11	12/17/12	12/17/12	12/18/12	7/7/2011
Jasmy Metayer	Driver	1/26/2011	2/13/12	2/13/12	2/13/12	12/17/12	1/26/11	12/17/12	12/17/12	12/18/12	1/26/2011

Position	Hire Date	First Aid/ CPR	Haz Waste Mgmt.	Fire Extinguisher	Shpyard Compete	Drug and Alcohol	ForkLift Operation	8 Hr. Refresher	USDOT Haz. Mat	WPC Orientation
Plant Ops	3/13/2012	12/17/12	12/17/12	12/17/12	12/17/12	3/13/12	3/13/12	12/17/12	12/18/12	3/13/2012
Supervisor	12/3/2012	12/17/12	12/17/12	12/17/12	12/17/12	12/3/12	5/7/12	12/17/12	12/18/12	12/3/2012
Administration	5/7/2012	12/17/12	12/17/12	12/17/12	x	5/7/12	5/7/2012	12/17/12	x	5/7/2012
Driver	5/30/2013	×	x	x	×	5/30/13	×	12/17/12	×	5/30/2013
Driver	6/27/2013	x	x	×	x	6/27/13	×	12/17/12	×	6/27/2013
Plant Ops	3/18/2013	x	x	x	X	3/18/13	x	12/17/12	x	3/18/2013
	Plant Ops Supervisor Administration Driver Driver	Plant Ops 3/13/2012 Supervisor 12/3/2012 Administration 5/7/2012 Driver 5/30/2013 Driver 6/27/2013	Plant Ops       3/13/2012       12/17/12         Supervisor       12/3/2012       12/17/12         Administration       5/7/2012       12/17/12         Driver       5/30/2013       x         Driver       6/27/2013       x	Plant Ops 3/13/2012 12/17/12 12/17/12 Supervisor 12/3/2012 12/17/12 12/17/12 Administration 5/7/2012 12/17/12 12/17/12 Driver 5/30/2013 x x Driver 6/27/2013 x x	Plant Ops 3/13/2012 12/17/12 12/17/12 12/17/12 Supervisor 12/3/2012 12/17/12 12/17/12 12/17/12 Administration 5/7/2012 12/17/12 12/17/12 12/17/12 Driver 5/30/2013 x x x x  Driver 6/27/2013 x x x x	Plant Ops   3/13/2012   12/17/12   12/17/12   12/17/12   12/17/12   12/17/12   12/17/12   12/17/12   12/17/12   12/17/12   12/17/12   Administration   5/7/2012   12/17/12   12/17/12   12/17/12   x   Driver   5/30/2013   x   x   x   x   x   x     Driver   6/27/2013   x   x   x   x   x   x     x	Plant Ops   3/13/2012   12/17/12   12/17/12   12/17/12   12/17/12   3/13/12     Supervisor   12/3/2012   12/17/12   12/17/12   12/17/12   12/17/12   12/3/12     Administration   5/7/2012   12/17/12   12/17/12   12/17/12   x   5/7/12     Driver   5/30/2013   x   x   x   x   x   5/30/13     Driver   6/27/2013   x   x   x   x   x   6/27/13	Plant Ops 3/13/2012 12/17/12 12/17/12 12/17/12 12/17/12 3/13/12 3/13/12 Supervisor 12/3/2012 12/17/12 12/17/12 12/17/12 12/17/12 12/3/12 5/7/2012 Administration 5/7/2012 12/17/12 12/17/12 12/17/12 x 5/7/12 5/7/2012 Driver 5/30/2013 x x x x x x 6/27/13 x  Driver 6/27/2013 x x x x x x 6/27/13 x	Plant Ops   3/13/2012   12/17/12   12/17/12   12/17/12   12/17/12   3/13/12   3/13/12   12/17/12   12/17/12   12/17/12   12/17/12   12/3/12   5/7/12   12/17/12   12/17/12   12/3/12   5/7/12   12/17/12   12/3/12   12/3/12   12/17/12   12/3/12   12/3/12   12/17/12   12/3/12   12/3/12   12/17/12   12/3/12   12/3/12   12/17/12   12/3/12	Plent Ops   3/13/2012   12/17/12   12/17/12   12/17/12   12/17/12   3/13/12   3/13/12   12/17/12   12/18/12     Supervisor   12/3/2012   12/17/12   12/17/12   12/17/12   12/17/12   12/3/12   5/77/12   12/17/12   12/18/12     Administration   5/7/2012   12/17/12   12/17/12   12/17/12   x   x   x   x   x   x   x   x   x

.



### Appendix H **Emergency Contacts**

Designated person responsible for spill prevention: Eric Miranda

### **EMERGENCY TELEPHONE NUMBERS:**

**Facility** 

Fort Lauderdale Fire Rescue

(954) 828-6800 (954) 415-3999

Florida Department of Environmental Protection

Physical Address:

Southeast District Office (normal business hours) 400 N. Congress Ave, 3<sup>rd</sup> Floor

West Palm Beach FL 33401

Phone: (561) 681-6600

Fax: (561) 681-6770

Phone: (850) 245-8707

State & Local Agencies

FDEP - Tallahassee (normal business hours)

(800) 424-8802

National Response Center Phone:

EPA Emergency Response (Atlanta)

State Warning Point (24 hour-spill contact)

(Emergency Management, State of Florida)

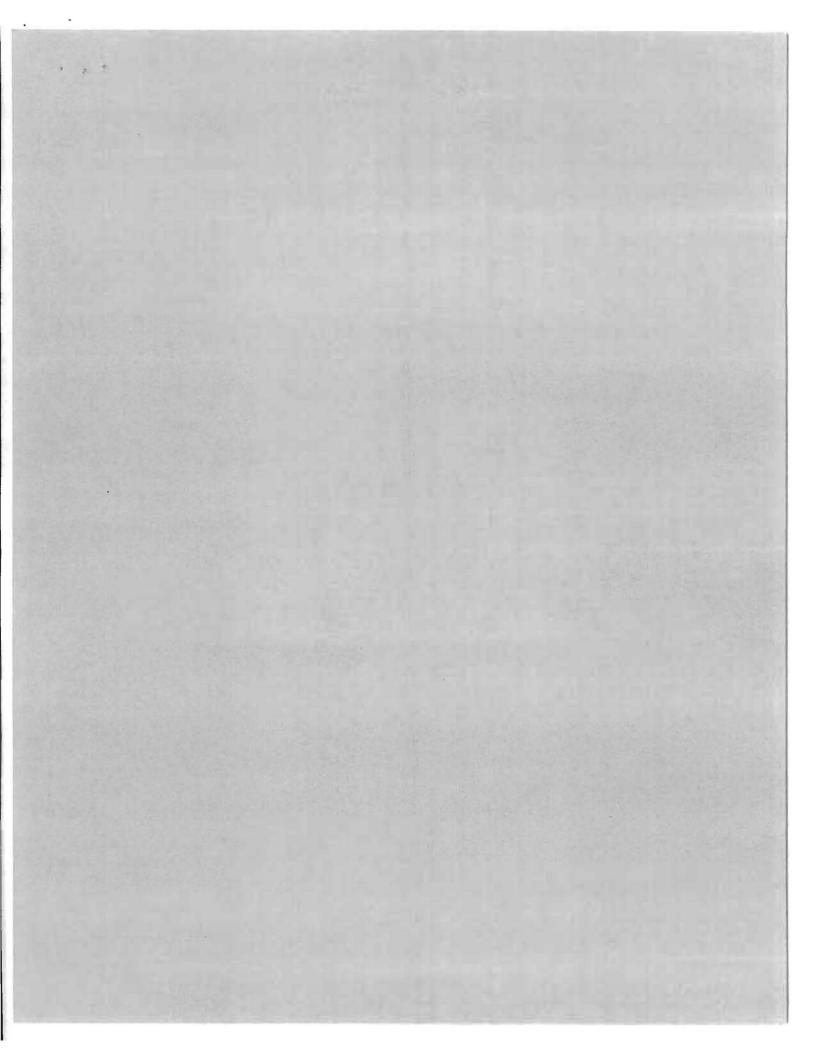
Phone: (404) 562-8700

Phone: (800) 320-0519

Broward County Department of Planning and

**Environmental Protection** 

Phone: (954) 519-1400



### INTRODUCTION

World Petroleum Corp is a company engaged in the collection, transport, storage and processing of used oil and oily wastewater and other products as listed in **Attachment A**. The facility is located at 3650 S.W. 47<sup>th</sup> Ave, Davie Florida 33314. The site is situated in latitude 25 D 50 M N, Longitude 80 D 18 M W, range 40 Easting, Section 14, Township 53 South. A Location Map for the site is included in **Attachment A**. The following Closure Plan has been prepared for World Petroleum Corp pursuant to the permitting requirements set forth in Rule 62-710.800(9)(a), Florida Administrative Code (FAC). A copy of this Closure Plan will also be maintained on file at the World Petroleum Corp, corporate office located at 3701 SW 47<sup>th</sup> Ave, Suite 101, Davie, FL 33314, in accordance with the record keeping requirements set forth in Rule 62-710.510(4), FAC. The Closure Plan is based upon a scheduled and orderly shutdown of the facility. World Petroleum Corp will submit an updated and detailed closure plan to the FDEP at least 30 days prior to the scheduled date of closing the facility.

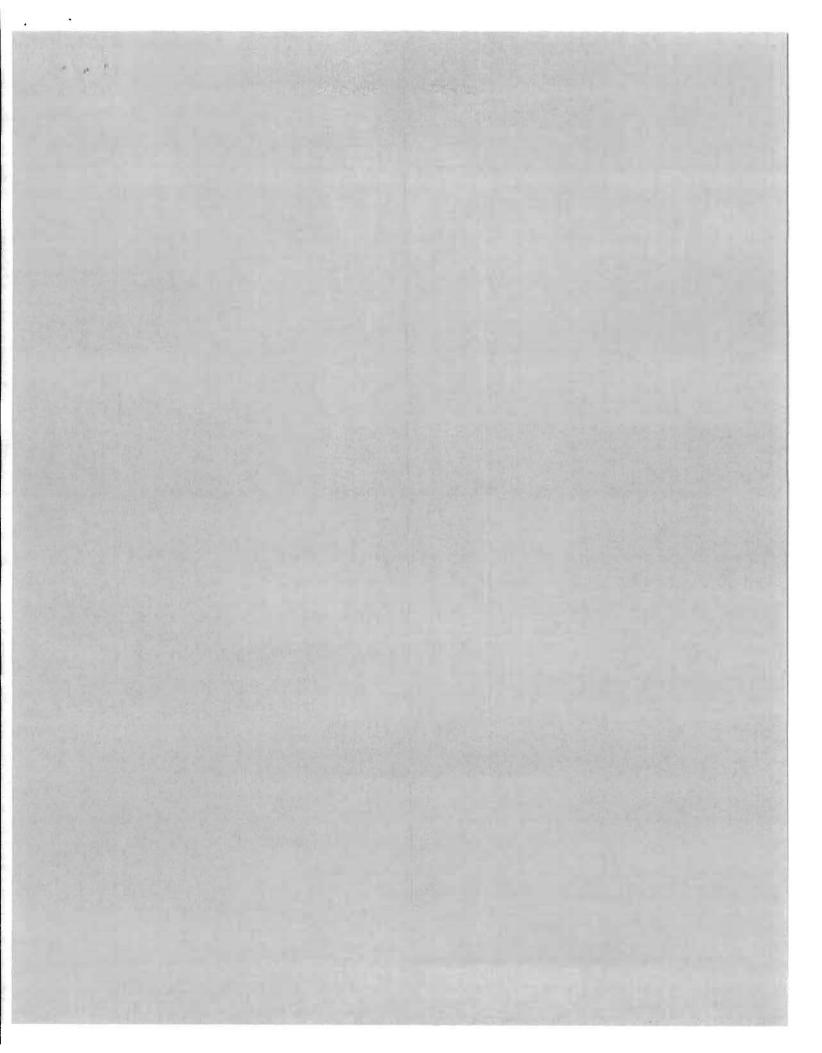
### FACILITY CLOSURE PROCEDURES

In accordance with Rule 62-710.800(9)(a) FAC, in the event that the World Petroleum Corp, facility is closed, steps will be taken to ensure that: (1) there will be no need for further facility maintenance; (2) used oil will not contaminate surface or groundwater; (3) all tanks, piping, secondary containment and ancillary equipment including the storage pad for oily rags/absorbents and drums will be emptied, cleaned and decontaminated, and all materials removed and managed; and (4) aboveground storage and process tanks and all integral piping will be closed pursuant to Rule 62-762.801, FAC.

The above requirements will be met by closing the aboveground storage tank system and assessing the site in accordance with Rule 62-762.801 FAC. These activities will include:

- Notification of local authorities and FDEP at least 30 days prior to closure of the storage tank system,
- Removal of all liquid and sludge from the tanks and integral piping and off-site disposal of the contents at properly licensed and permitted disposal/recycling facilities,
- Pressure wash rinsing of all containment areas and the storage pad, and
- Collection of representative soil samples from around and beneath the tank area, and visual
  inspection for evidence of contamination. Should evidence of contamination be present, then soil
  and groundwater contamination assessment and possibly remedial activities will be conducted in
  accordance with Rule 62-780, FAC, and Rule 62-770, FAC (Petroleum contamination site cleanup
  criteria).

A closure certification report will be submitted to certify closure was completed in accordance with the closure plan. Soil sample locations will identify and FDEP approval for the sampling locations prior to implementing the sampling plan. All liquid and solid samples will be analyzed for the same constituents as the sampling for used oil or sludge's managed at the facility with the addition of TRPH for soil samples.



## EMPLOYEE TRAINING MANUAL APPLICABLE STATE AND FEDERAL USED OIL REGULATIONS

The following information is provided to you as part of the certification program implemented by the Florida Department of Environmental Protection.

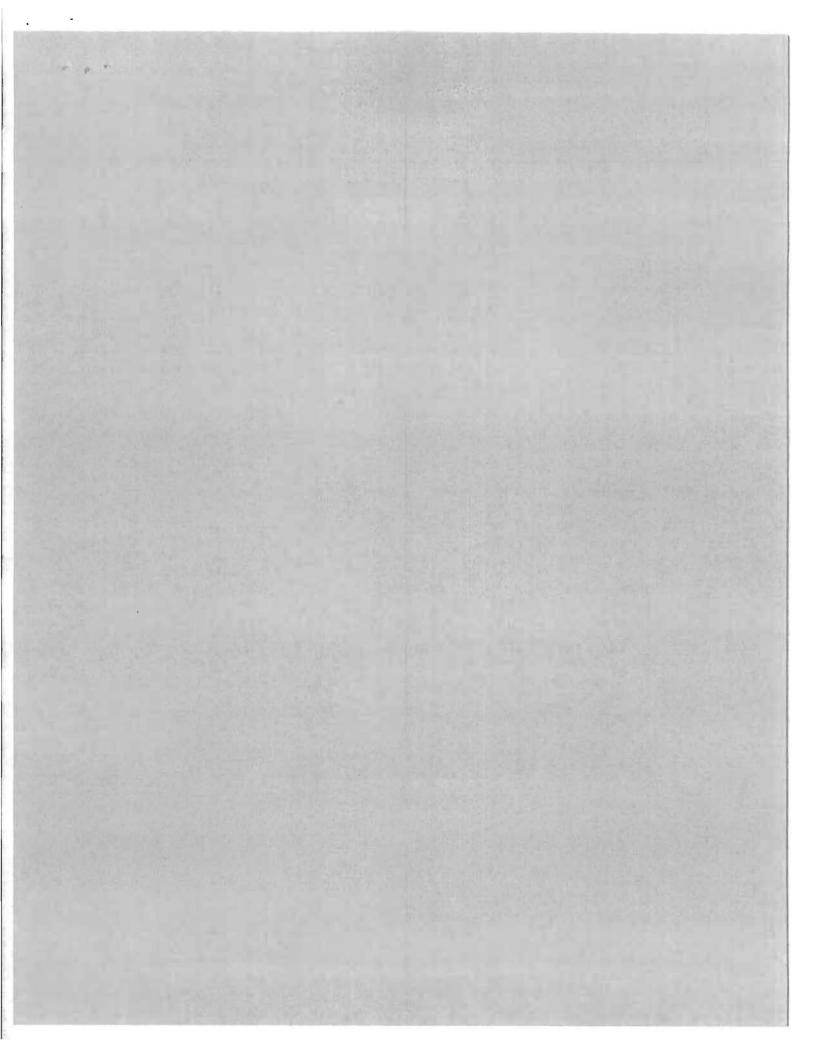
As an employee of World Petroleum Corp you will be responsible for learning and understanding this information. The company has interpreted the relevant information you will need to learn in this manual.

The Federal Environmental Protection Agency located in Washington, D.C. (EPA). The EPA is lead agency in determining rules and regulations pertaining to used oil and other environmental subjects. Regulations that are adopted by the EPA are written into the Code of Federal Regulations (CFR). The Federal Register is a printed manual that is released to the public and first contains the proposed or adopted regulations. The CFR sections that apply to our business are 40 CFR Part 279.

The Florida Department of Environmental Protection (FDEP) located in Tallahassee, Florida. The FDEP must implement regulations for the State of Florida that have been adopted by the Florida Legislature and the Federal EPA. The FDEP must enforce the state and federal regulations and can also impose stronger regulations than the federal EPA.

The Dade County Regulatory and Economic Resources (Environmental Resources Management) in Miami, Florida. This agency also assists the Florida Department of Environmental Protection to enforce both EPA and FDEP regulations. In addition, Regulatory and Economic Resources may impose its own regulations pertaining to local environmental matters.

Most used oil sold in Florida, as "on-specification" or "off-specification". Used-oil fuel is filtered, dewatered, and sometimes blended with new fuel to meet federal and end-user specifications. The end-user (usually an industrial burner) will substitute used oil fuels only if there are cost effective, as compared to compatible virgin fuels such as diesel fuel # 2 and black fuel #4 through # 6.



### SOLID WASTE CLOSURE PLAN INTRODUCTION

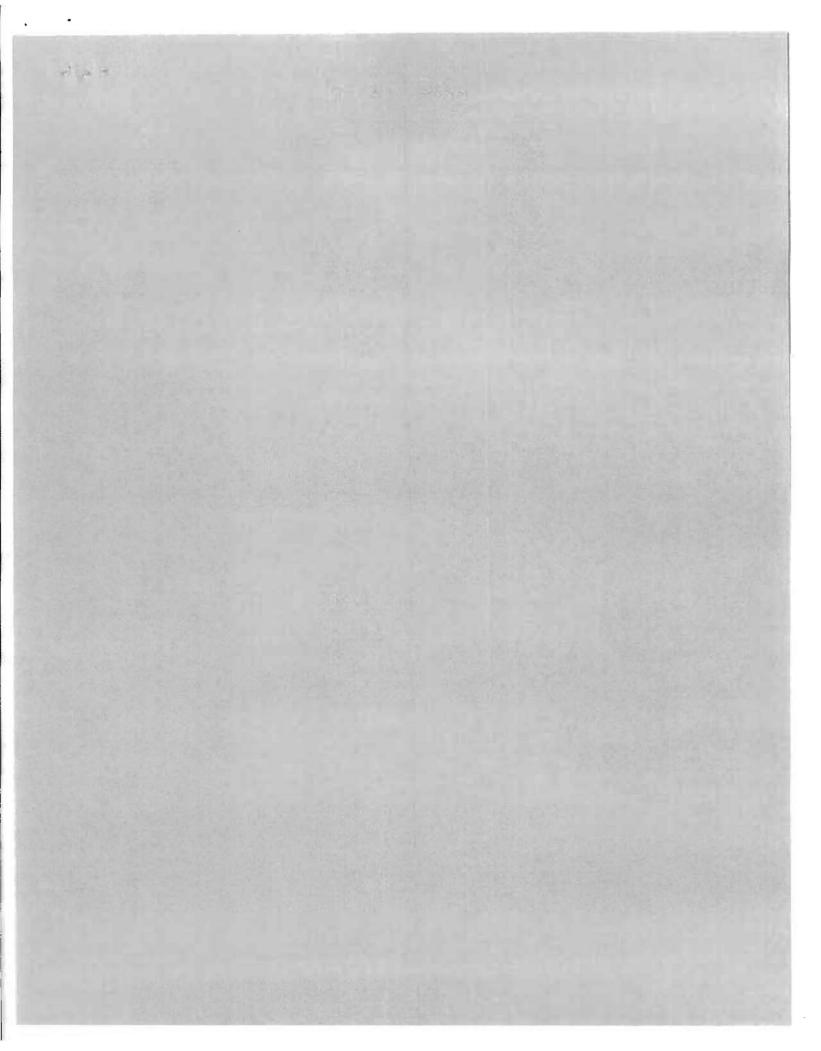
World Petroleum Corp. is a company engaged in the collection, transport, storage and processing of used oil, oily wastewater, and solid wastes. At the Davie facility, solid wastes are accepted in either 55-gal drums or roll-off containers. The 55-gal drum wastes are unloaded in the solid waste storage area, process into roll-off containers. Each drum is manifested listing original generator address and content. The emptied drums are cleaned and shipped out as scrap metal. The process wastes are shipped to a permitted landfill or State approved incinerator for proper disposal. The facility is located at 3650 SW 47<sup>th</sup> Avenue, Davie, Florida. The following Closure Plan has been prepared for World Petroleum Corp. pursuant to the requirements set forth in Rule 62-701.710(6), Florida Administrative Code (FAC). A copy of this Closure Plan will also be maintained on file at the World Petroleum Corp. facility.

### PROCESS DESCRIPTION

World Petroleum Corp. operates a waste oil collection, transportation, processing and recycling business with serves a variety of automotive commercial and industrial businesses throughout Florida. The Davie facility is a registered used oil transporter, transfer facility, processor, material processing facility and marketer with the Florida Department of Environmental Protection (FDEP). Solid waste quantities received daily will vary between zero (0) and thirty (30) tons. Since the processes generating the waste are episodic, it is impractical to calculate daily averages. The waste types are contaminated petroleum products, used oil filters, and petroleum contaminated material. World Petroleum Corp. requires the generator to perform waste characterization or utilize process knowledge to demonstrate that the waste is not hazardous, as defined in Florida Administrative Code 62-730. All plant employees engage in the solid operations have received the 40 hour hazwoper (29 CFR 1910.120) class. In addition plant employee follows WPC procedures to ensure all wastes are removed and placed in the appropriate containers for proper disposal at a State permitted facility. These materials are further discussed below:

### **Used Oil Filters**

Used oil filters are received in containers (usually 55-gallon drums) and off-loaded in the solid area, as shown in the site diagram. Secondary containment is provided by asphalt curbs. The drums are cleaned crushed and manifested into a roll-off and shipped off to US Foundry in Miami as scrap metal.



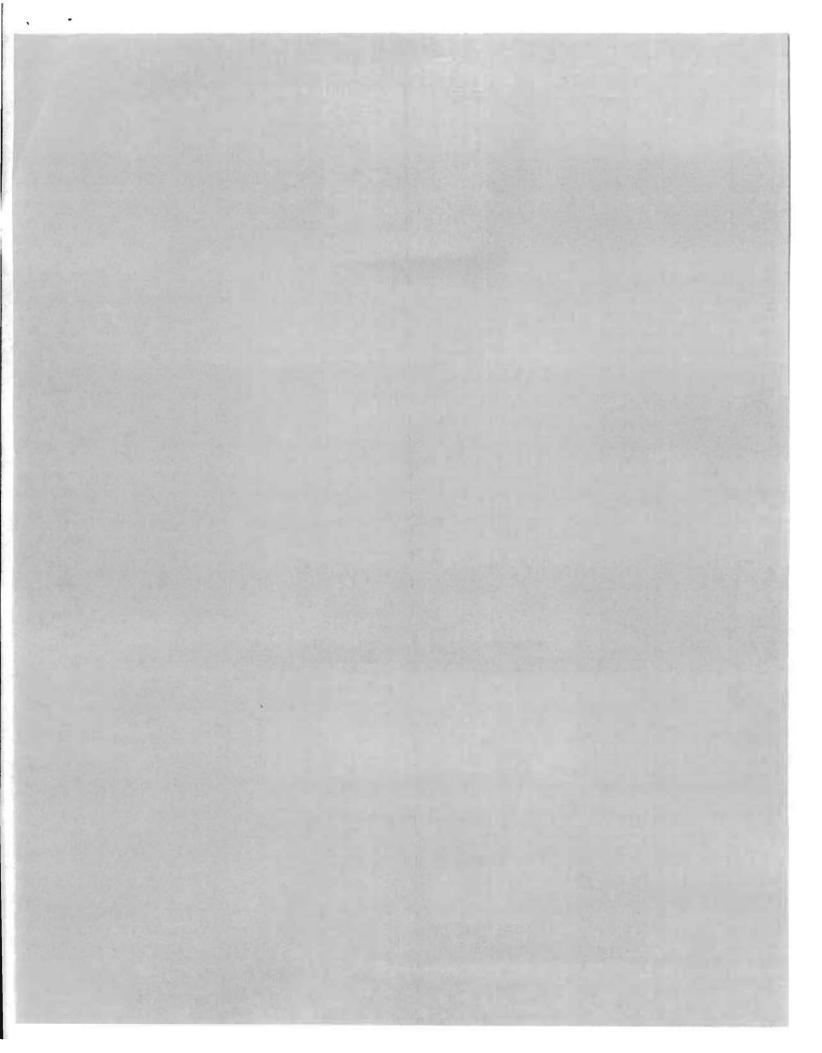
For purposes of calculating the volume of solid waste at the facility, a full roll-off container will contain 20 tons. Each drum will represent 450 pounds. As an example, if there is a roll-off container 50% full and 100 drums present, then the amount of solid waste on-site would be:

Maximum container storage:

 $0.50 \times 20 + (100 \times 450)/2000 = 10 + 22.5 = 32.5 \text{ tons}$ 

### **Petroleum Contaminated Material**

Oily wastes materials such as sludge's, bottom sediments, tank bottoms, and absorbents which have come in contact with, and have been contaminated by, used oil. In addition to the above list are non-hazardous petroleum contaminated soils, sludge, debris, personal protective equipment (P.P.E.) are processed. These materials are bulked and/or sent directly to Waste Management in Pompano Beach, FL or a permitted Solid Waste Disposal/Treatment facility (Cemex in Miami).



### **FACILITY CLOSURE PROCEDURES**

In the event that the World Petroleum Corp. facility is closed, steps will be taken to ensure that: (1) there will be no need for further facility maintenance; (2) hazardous constituents will not contaminate surface or groundwater; (3) secondary containment and ancillary equipment including the storage area for drums will be emptied, cleaned and decontaminated, and all materials removed and managed.

The above requirements will be met by closing the waste storage area and assessing the site. These activities will include:

- 1. Notification of Broward County and FDEP at least 30 days prior to closure of the solid waste storage area.
- 2. Shipment of all containers of solid waste to permitted facilities.
- 3. Pressure wash rinsing of all containment areas and the storage area.
- 4. A representative sample of the rinse water will be sampled and analyzed for hazardous constituents based on the material that was managed in the solid waste storage area. The rinse water will be managed in accordance with all applicable regulations.
- 5. In the event there is evidence of spillage or contamination outside the containment area, representative soil samples in the suspected area will be taken. In addition, groundwater contamination assessment and possibly remedial activities will be conducted in accordance with Rule 62-780, FAC.

A closure certification report will be submitted to certify closure was completed in accordance with the closure plan. Soil sample locations will be identified and FDEP approval for the sampling locations will be obtained prior to implementing the sampling plan. The relevant Clean-up Target Levels for soil and groundwater, if required are contained in F.A.C. Rule 62-777. Petroleum Product Contaminants of Concern are defined in F.A.C. Rule 62-770 Table A. Sampling and analytical protocols will be in accordance with U.S. EPA SW-846 Methods and will include the Florida Petroleum Residual Organic Method for Total Recoverable Petroleum Hydrocarbons. In general, disposal analyses will be required for Florida preborn constituents. Metals will be analyzed by Method 6010 or Graphite Furnace Method 7470 for mercury; volatile and semi-volatile organics will be analyzed by Methods 8260/8270. The laboratory will use other U.S. EPA-approved methods appropriate to the sample matrix and analytical requirements