

Fellabaum, Pamela

From: Hughes, Jonas <Jonas.Hughes@Crystal-Clean.com>
Sent: Monday, August 25, 2014 1:06 PM
To: tam.stanley@epa.gov
Cc: Fellabaum, Pamela
Subject: FW: FL inspection - Jacksonville
Attachments: Closure plan.pdf; Copy of FL_HAZ_Shipments_March1.xlsx; Halogen screening.pdf; Job descriptions.pdf; Notification to local authorities.pdf; HCC HW container inspection form.pdf

Please see attached. Let me know if you need anything else. Thank you

From: Walper, Michelle
Sent: Friday, August 01, 2014 10:22 AM
To: Hughes, Jonas; McCord, Catherine
Cc: Pendry, Anita; Hurin, Billy
Subject: Fwd: FL inspection - Jacksonville

Here is the information in response to the inspection from late June at the Jacksonville branch.
I can send a letter to the inspector if necessary. I do not have the contact information.
Thanks
Michelle

- > Here are the things the EPA needs documents on.
- > 1) Job title and description of position 265.16(d) - Attached job descriptions
- > 2) Copy of the inspection plan 265.15(b)(2) - Attached copy of container inspection form
- > 3) Confirmation of notification to local authorities in response to
- > haz materials on site 265.37 - Attached copies of notifications
- > 4) Copy of closure requirements for drums submitted to Tallahassee - Attached copy of closure plan
- > 5) Copy of waste log for all haz waste entering and leaving the branch
- > (10 Day Rule) - Jonas you will need to supply the waste log, please find attached the FL Haz shipment report from IT for March HW
- > (He wants it for the month of March 2014 (just haz waste)
- > 6) Report showing transporter determine whether the used oil has total
- > halogen content above or below 1,000 PPM - Attached halogen screening summary

I believe the attached FL Haz shipments for March includes all info except manifest number.
Since there were only a few shipments this should be fairly easy to add.

They are looking for haz waste only with this information.

- > A) Manifest number for each shipment that enters and leaves the
- > facility
- > B) The date when all Hazardous waste enters and leaves the facility
- > C) The generator's name and the EPA/DEP identification number
- > D) Amounts of hazardous waste and hazardous waste codes associated
- > with each shipment into and out of the facility,

> Is there a report we can run to obtain this information? The waste log
> doesn't contain this information.

Michelle Walper
Compliance Manager
Heritage - Crystal Clean, LLC
2175 Point Blvd., Suite 375
Elgin, IL 60123-2911

(847) 783-5355
(847) 836-6169 (fax)
(630) 740-0932 (cell)

From: Hughes, Jonas
Sent: Thursday, July 31, 2014 1:33 PM
To: Walper, Michelle
Cc: Pendry, Anita
Subject: Re: [#WMC-301-64677]: Fwd: FL inspection

I haven't receive anything yet

On Jul 31, 2014, at 2:30 PM, "Walper, Michelle" <Michelle.Walper@Crystal-Clean.com> wrote:

Did you get any of the information from IT that you requested back in June (see IT note below)? I'm putting together the information I have together, but not sure about the report that might be run on items below.

They are looking for haz waste only with this information.

- > A) Manifest number for each shipment that enters and leaves the
- > facility
- > B) The date when all Hazardous waste enters and leaves the facility
- > C) The generator's name and the EPA/DEP identification number
- > D) Amounts of hazardous waste and hazardous waste codes associated
- > with each shipment into and out of the facility,
- > Is there a report we can run to obtain this information? The waste log
- > doesn't contain this information.

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(630) 740-0932 (cell)

From: Tiger Liu [<mailto:helpdesk@crystal-clean.com>]
Sent: Tuesday, July 29, 2014 2:05 PM
To: Hurlbut, Brian
Cc: Walper, Michelle; Liu, Luyang (Tiger)
Subject: [#WMC-301-64677]: Fwd: FL inspection
Importance: High

Michelle,
Do you still need any assistance for this one?

Thanks,

Tiger Liu
Applications Programmer
Heritage - Crystal Clean, LLC

> Begin forwarded message:

>

> From: "Hughes, Jonas"

> Subject: RE: FL inspection

> Date: June 23, 2014 3:32:17 PM CDT

> To: "Walper, Michelle"

> Cc: "Hurin, Billy" , "Hurlbut, Brian"

> >, "Pendry, Anita"

>

> Hey Michelle,

> They are looking for haz waste only with this information.

> A) Manifest number for each shipment that enters and leaves the
> facility

> B) The date when all Hazardous waste enters and leaves the facility

> C) The generator's name and the EPA/DEP identification number

> D) Amounts of hazardous waste and hazardous waste codes associated
> with each shipment into and out of the facility,

> Is there a report we can run to obtain this information? The waste log

> doesn't contain this information.

>

> From: Walper, Michelle

> Sent: Friday, June 20, 2014 1:40 PM

> To: Hughes, Jonas

> Cc: Hurin, Billy; Hurlbut, Brian; Pendry, Anita

> Subject: RE: FL inspection

>

> Hi Jonas

> I'm working on the other documents but an you get the waste log for
> March? I've copied Brian in case we need to get that information
> from IT.
> I'm not sure how long this information is kept and if you will need
> help to run some type of report to obtain it.
> Thanks
> Michelle
>
> Copy of waste log for all haz waste entering and leaving the branch (
> 10 Day Rule)
> (He wants it for the month of March 2014 (just haz waste)
>
> From: Hughes, Jonas
> Sent: Friday, June 20, 2014 8:45 AM
> To: Hurin, Billy; Pendry, Anita; McCord, Catherine; Walper, Michelle
> Subject: RE: FL inspection
>
> Here are the things the EPA needs documents on.
> 1) Job title and description of position 265.16(d)
> 2) Copy of the inspection plan 265.15(b)(2)
> 3) Confirmation of notification to local authorities in response to
> haz materials on site 265.37
> 4) Copy of closure requirements for drums submitted to Tallahassee
> 5) Copy of waste log for all haz waste entering and leaving the branch
> (10 Day Rule)
> (He wants it for the month of March 2014 (just haz waste)
> 6) Report showing transporter determine whether the used oil has total
> halogen content above or below 1,000 PPM
>
> I don't believe I left anything out, but refer to the checklists
> attached, these where the ones they used during the inspection.
> Just let me know if you need anything. Thanks
> From: Hurin, Billy
> Sent: Friday, June 20, 2014 9:14 AM
> To: Pendry, Anita; Hughes, Jonas
> Cc: Walper, Michelle
> Subject: Re: FL inspection
>
> Okay. Thanks Anita. If you need anything from me please let me know.
>
> Jonas be sure to cc me on what EPA is requesting.
>
> Billy Hurin
> Crystal Clean
> Regional Mgr.
> 704.905.7430
>
> On Jun 19, 2014, at 2:45 PM, "Pendry, Anita" wrote:

> FYI – Michelle is going to try to get this handled. She is going to
> try to work with Jonas directly.
>
> Anita Pendry
> Director, DOT, Waste Approvals, Compliance
> Heritage-Crystal Clean, LLC
>
> Office: 847-783-5924
> Cell: 630-688-3303
>
> From: Walper, Michelle
> Sent: Thursday, June 19, 2014 11:07 AM
> To: Hughes, Jonas
> Cc: Pendry, Anita
> Subject: FL inspection
>
> Hi Jonas
> Catherine indicated you have a list of the information that the FL DEP
> was requesting before they issue any paperwork. Could you provide me
> with that list so I can start working on some of the things that are
> needed?
> Thanks
> Michelle
>
> Michelle Walper
> Compliance Manager
> Heritage - Crystal Clean, LLC
> 2175 Point Blvd., Suite 375
> Elgin, IL 60123-2911
>
> (847) 783-5355
> (847) 836-6169 (fax)
> (630) 740-0932 (cell)
>
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- > intended recipient shall not be deemed a waiver of any rights of
- > confidentiality.
- >
- >

Ticket Details

Ticket ID: WMC-301-64677

Department: Application Support

Type: Issue

Status: In Progress

Priority: High

Support Center: <http://ccsupport.helpserve.com>

The information contained in this e-mail communication and any attached documentation is intended only for the exclusive use of the designated recipient(s). If the reader or recipient of this e-mail and any attached documentation is not the intended recipient or an employee or agent of the intended recipient who is responsible for delivering it to the intended recipient, you are hereby notified that any dissemination, distribution or copying of this e-mail and any attached documentation is strictly prohibited. If you have received this e-mail in error, please immediately notify the sender by return e-mail and promptly delete the e-mail and any attached documentation. This e-mail and any attached documentation may contain information that is privileged, confidential, proprietary or otherwise protected by law. This notice serves as a confidentiality marking for the purpose of any confidentiality or nondisclosure agreement. Receipt of this e-mail and the attached documentation by anyone other than the intended recipient shall not be deemed a waiver of any rights of confidentiality.

**HERITAGE-CRYSTAL CLEAN, LLC
CLOSURE COST ESTIMATE AND CLOSURE PLAN**

11643 103rd St.
Jacksonville, Florida
10-day transfer operation

The 10-day transfer regulations in Florida link closure requirements to these operations.

40 CFR 265.111 states:

§ 265.111 Closure performance standard.

The owner or operator must close the facility in a manner that:

- (a) Minimizes the need for further maintenance, and
- (b) Controls, minimizes or eliminates, to the extent necessary to protect human health and the environment, post-closure escape of hazardous waste, hazardous constituents, leachate, contaminated run-off, or hazardous waste decomposition products to the ground or surface waters or to the atmosphere, and
- (c) Complies with the closure requires of this subpart, including, but not limited to, the requirements of §§ 265.197, 265.228, 265.258, 265.280, 265.310, 265.351, 265.381, 265.404, and 265.1102.

Heritage-Crystal Clean, LLC ("Crystal Clean") operates its 10-day transfer facility by collecting containerized hazardous waste, conditionally exempt waste, non-hazardous waste, and solvent product from its customers. Containers are transported from customers to the branch on small route trucks. At the branch, containers are moved from route trucks to a semi-trailer (tail gate to tail gate). No containers are opened.

The closure performance requires closure to minimize further maintenance and minimize contamination and migration of contamination. 40 CFR 265.111(c) specifically references certain interim status waste management units. 10-day transfer facilities are not included in these unit specific standards.

In order to meet the closure performance requirements of 40 CFR 265.111(a) and (b), Crystal Clean will address any soil (and possible groundwater) contamination at the time of any spill event, where material leaked from a container and went beyond the secondary containment systems found in both our route trucks and box trailers. At the time of closure, there will be a visual inspection of the facility to determine if any staining from site operations has occurred, as well as a review of any spill and spill clean-up history. If either evaluation reveals unremediated staining resulting from site activities, Crystal Clean will take appropriate action. This approach would also allow for the targeting of specific constituents of concern from a specific container, since all containers are labeled as to their contents.

This approach minimizes the possibility of migration of contamination by addressing contaminants at the time of the release, not later at the time of closure.

§ 265.112 Closure plan; amendment of plan.

Crystal Clean will notify FL DEP at least 180 days prior to the date it expects to start closure. There may be circumstances where the notification will be less because of changes in the lease or business needs would require moving to another location. Crystal Clean will submit a notification and closure plan at least 60 days prior to closure.

§ 265.114 Disposal or Decontamination of Equipment, Structures or Soil

No disposal or decontamination is anticipated by closure of this truck-to-truck transfer operation. This closure plan will be modified if circumstances warrant a change during closure.

§ 265.115 Certification of Closure

Crystal Clean will certify closure upon completion of removal of the transfer containers from the location.

The closure certification required pursuant to 40 CFR 265.115 will include, as applicable, manifest(s) showing disposal of the final volume of waste, a brief report detailing observations made for the presence of contamination from any spills and releases, and any necessary corrective measures for the removal of contaminated soils, including sampling data, if any.

Closure Cost Estimates

No waste is ever treated, stored, or disposed at the Jacksonville 10-day transfer facility. The waste is transferred from truck-to-truck. Closure activities would include removal of all waste from the 10-day trailer. An estimate of these costs are provided below. No verification sampling is required. If there would ever be a spill at the 10-day transfer location, any resulting contamination would be dealt with as part of that spill response. Crystal Clean would notify the FL DEP if another situation would arise.

Current RCRA hazardous waste inventory is approximately 2 55-gallon drums every 10 days. To accommodate business growth, we are basing the closure cost estimate on 40 55-gallon drums of hazardous waste at the 10-day facility at one time. This is a conservative estimate of the volume.

40 55-gallons drums

Breakdown

5 incinerate	\$400/drum	=	\$ 2,000
30 fuel blending	\$ 75/drum	=	\$ 2,250
5 wastewater treatment or neutralization	\$130/drum	=	\$ 650

	\$ 4,900
Transportation	\$ 3,000

Total	\$ 7,900
-------	----------

Revised 3-19-09 CAM
Revised 6-14-10 MW
Revised 12-16-10 MW

Branch Manager

ARE YOU READY TO SHARE IN THE EXCITEMENT OF BEING ON THE WINNING TEAM?

Heritage - Crystal Clean LLC, a leader in the environmental services industry, is looking for a self-motivated team player to join our rapidly growing organization. Responsibilities include sales and service of parts cleaner equipment and environmental waste services to automotive and industrial businesses. Experience in route sales or service helpful but not necessary.

Specific Duties:

- **Overall responsibility for sales, growth and facility operations within a specific geographic area as defined by the Company.**
- **Plan, direct and monitor activities of all sales personnel.**
- **Responsible for the quality, on-time performance of all customer services assigned to the branch each sales period.**
- **Training of all branch personnel including Branch Service Representatives and Branch Sales Managers.**
- **Assist or accompany SSR/BSM during sales activities as necessary.**
- **Tabulate and report daily, weekly and period sales results to management.**
- **Maintain inventory of solvent, allied products and equipment.**
- **Adhere to all corporate policies and standards including but not limited to environmental and regulatory, human resources, facility, equipment, operations and maintenance.**
- **Performs other related duties as assigned.**

We are willing to provide complete training.

Benefits:

- **Medical and Dental**
- **401K & Stock Purchase Plan**
- **Competitive salary plus commission**
- **Car Allowance**
- **Paid time off**
- **Short-term disability**
- **Life and accident insurance**
- **Advancement opportunities**

Please e-mail resume to:

Jeff Roche
Regional Manager
Heritage – Crystal Clean
1005 Richards Rd. Unit O
Hartland, WI 53029

Email: Jeff.Roche@crystal-clean.com

Phone: (262) 613-3661

Fax: (262) 367-2162

Heritage Crystal Clean LLC is an Equal Opportunity Employer. We strongly encourage women, minorities, individuals with disabilities and veterans to apply.

Requirements:

Must have or be qualified to obtain a class "B" C.D.L. license. All applicants must pass the company paid physical exam including substance abuse screening. It is also required that you complete the *Employee Agreement* prior to the start of your employment with Heritage-Crystal Clean.

ROUTE SALES & SERVICE REPRESENTATIVE – OIL SERVICES

ARE YOU READY TO SHARE IN THE EXCITEMENT OF BEING ON THE WINNING TEAM?

A leader in the environmental services industry is looking for a self-motivated team player to join our rapidly growing organization. Responsibilities include sales and service of used oil and used oily water collection and environmental waste services to automotive and industrial businesses. Experience in route sales or service helpful but not necessary.

Specific Duties:

- Responsible for customer service and new business development in a certain geographic area as assigned by the Company.
- Aligns work orders to minimize mileage and travel time.
- Inspects vehicle and equipment for safe operation.
- Services customers by pumping approved used oil and oily water waste from customer containment into truck.
- Provides allied products as needed and pursues additional services with existing accounts.
- Assess potential customer needs, present products and services and develop new customers.
- Complete all required paperwork accurately and neatly. Maintain driving log for D.O.T.
- Develop sales leads for Data-Marketing.
- Adhere to all corporate policies and standards including but not limited to environmental and regulatory, human resources, facility, equipment, operations and maintenance.
- Performs other related duties as assigned.

Benefits:

- Medical and Dental
- Vision
- 401K
- Competitive salary plus commission
- Paid time off
- Short-term disability
- Life and accident insurance
- Employee stock purchase plan
- Advancement opportunities

Please e-mail resume to:

Joe Rehe
Division 2 Oil/Vac Sales Manager
Heritage-Crystal Clean
590 Northland Blvd.
Cincinnati, OH 45240

Email: Joe.Rehe@crystal-clean.com

Phone: (513) 200-9851

Fax: (513) 821-4622

Heritage Crystal Clean LLC is an Equal Opportunity Employer. We strongly encourage women, minorities, individuals with disabilities and veterans to apply.

Requirements:

Must have or be qualified to obtain a class "B" C.D.L. license, plus Hazmat. All applicants must pass the company paid physical exam including substance abuse screening.

VACUUM ROUTE SALES & SERVICE REPRESENTATIVE

ARE YOU READY TO SHARE IN THE EXCITEMENT OF BEING ON THE WINNING TEAM?

Heritage - Crystal Clean LLC, a leader in the environmental services industry, is looking for a self-motivated team player to join our rapidly growing organization. Responsibilities include providing environmental waste services to automotive and industrial businesses. Experience in route sales or service helpful but not necessary.

Job Description:

Using state of the art vacuum trucks Vacuum Sales and Service Representatives pump and remove liquids containing sediment, oil and sludge from pits, separators, traps and sumps.

Specific Duties:

- Responsible for customer service and new business development in a certain geographic area as assigned by the Company.
- Aligns work orders to minimize mileage and travel time.
- Inspects vehicle and equipment for safe operation.
- Delivers service to customers by vacuuming approved oily/water waste sludge from customer containment into truck.
- Provides allied products as needed and pursues additional services with existing accounts.
- Assess potential customer needs, present HCC products and services and develop new customers.
- Complete all required paperwork accurately and neatly. Maintain driving log for D.O.T.
- Achieve sales quotas for total revenue and new customer development.
- Develop sales leads for Data-Marketing.
- Adhere to all corporate policies and standards including but not limited to environmental and regulatory, human resources, facility, equipment, operations and maintenance.
- Performs other related duties as assigned.

We are willing to provide complete training.

Benefits:

- Medical and Dental
- 401K
- Employee Stock Purchase Plan
- Competitive salary plus commission
- Paid time off
- Short-term disability
- Life and accident insurance
- Advancement opportunities

Please e-mail resume to:

Joe Kriczky
Divisional Oil & Vacuum Sales Manager

Email: Joe.Kriczky@crystal-clean.com

Fax: (302) 376-1299

Heritage Crystal Clean LLC is an Equal Opportunity Employer. We strongly encourage women, minorities, individuals with disabilities and veterans to apply.

Requirements:

Must have or be qualified to obtain a class "B" C.D.L. license. All applicants must pass the company paid physical exam including substance abuse screening.

Administrative Assistant

ARE YOU READY TO SHARE IN THE EXCITEMENT OF BEING ON THE WINNING TEAM?

Heritage - Crystal Clean LLC, a leader in the environmental services industry, is looking for a self-motivated team player to join our rapidly growing organization.

Specific duties:

- Sort and file all of the daily control sheets from prior day's work
- Update branch sales board
- Check sample status on company intranet
- Create service packs with labels and manifest for Sale Service Team
- Make up list of customers that have not been serviced
- Order office and sales supplies
- Clean up the office
- Call manufactures to get contact names and fill out lead sheets
- Adhere to all corporate policies and departmental processes
- Perform other related duties as assigned.

Required Skills:

- Detail oriented and well organized
- Professional phone manner
- Works well with others

Please send resume to:

Jay Slonske
Heritage – Crystal Clean
800 Transfer Rd, Suite 10
St. Paul, MN 55114

Fax: (651) 646-8417

Email: Jay.Slonske@crystal-clean.com

Heritage Crystal Clean LLC is an Equal Opportunity Employer. We strongly encourage women, minorities, individuals with disabilities and veterans to apply.

Requirements:

All applicants must pass the company paid substance abuse screening

Heritage-Crystal Clean, LLC - March Hazardous Waste 11643 103rd St., Jacksonville, FL 32210

STATUS	RECEIVED DATE	WORK ORDER NBR	WASTESTREAM NBR	WASTESTREAM	ORIG LOCATION	DEST LOCATION	SHIP DATE	RECEIVED TOTAL UNITS	OUT TOTAL UNITS	TYPE	TRAILER NBR	INVENT CONTAINER	RECEIVED ACTIVITY DATE	GENERATOR ID	GENERATOR	EPA_ID	AMOUNT
SHIPPED	3/26/2014	00-0068W2V	159416-2	RQ, UN1950, WASTE AEROSOLS, FLAMMABLE, 2.1, (D001) ERG# 126 (WASTESTREAM - 1060-PROCESSABLE AEROSOL CANS)	JACKSONVILLE	ATLANTA HUB	3/26/2014	2	2	LBS	9932873RU	DM (55G)	3/26/2014 9:20	159416	CARMAX STORE #7148	FLR000118455	6
SHIPPED	3/26/2014	00-0068W2V	159416-4	UN1993, WASTE FLAMMABLE LIQUIDS, N.O.S., 3, PG II, (ACETONE, ETHYLBENZENE) (D001) ERG# 128 (WASTESTREAM - 1020 - AQUEOUS BASED PAINT WASTE)	JACKSONVILLE	ATLANTA HUB	3/26/2014	4	4	LBS	9932873RU	DM (55G)	3/26/2014 9:20	159416	CARMAX STORE #7148	FLR000118455	6
SHIPPED	3/19/2014	00-0067VLB	266456-3	RQ, UN1263, WASTE PAINT RELATED MATERIAL, 3, PG II, (F003,F005,D001,D007,D008, D035) ERG# 128 (WASTESTREAM - 1011-NON-HALO. WASTE PAINT SLUDGE)	JACKSONVILLE	ATLANTA HUB	3/26/2014	3	3	LBS	9932873RU	DM (55G)	3/19/2014 9:45	266456	VERITAS STEEL, LLC	FLD984210344	3

Jul-14



June 20, 2014

Via UPS

City of Jacksonville Fire and Rescue
515 N Julia St
Jacksonville, FL 32202

RE: Heritage Crystal Clean Emergency Procedures

Dear Sir/Madam:

Heritage-Crystal Clean, LLC provides waste management and transportation services to customers in Florida. We are required by regulation to provide a copy of our Emergency Response Plan to local authorities. Please find enclosed a copy of our updated Contingency Plan/ Emergency Response Plan for our facility located at 11643 103rd St., Jacksonville, FL 32210. There has been an update to our emergency coordinator. Our new contact is Jonas Hughes and John Varnadore has been moved to our secondary emergency contact.

Please feel free to contact me with any questions.

Sincerely,

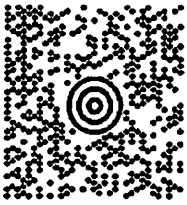

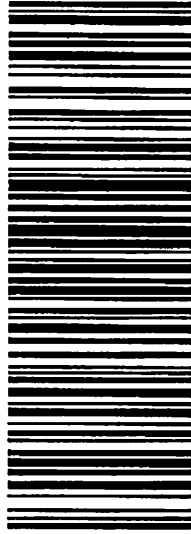

A handwritten signature in black ink that reads 'Michelle Walper'.

Michelle R. Walper
Compliance Manager

(847) 783-5355
Michelle.walper@crystal-clean.com

Attachment

2175 Point Boulevard – Suite 375, Elgin, IL 60123-2911
Phone: (847) 836-5670 Fax: (847) 836-5677 Toll Free: (877) WE TRY 4 U

MICHELLE WALPER 847-791-5150 HERITAGE CRYSTAL CLEAN 2175 POINT BLVD ELGIN IL 60123		0.0 LBS LTR	1 OF 1
SHIP TO: CITY OF JACKSONVILLE FIRE & RESCUE 515 N. JULIA STREET JACKSONVILLE FL 32202-4128			
		FL 322 9-22 	
UPS 2ND DAY AIR TRACKING #: 1Z 41A 2R6 02 9751 6570 2			
			
BILLING: P/P			
Reference # 2: /pa		CS 16.203. WNTZD51.0A 04/2014 	



Dear Customer,

This notice serves as proof of delivery for the shipment listed below.

Tracking Number: 1Z 41A 2R6 02 9751 657 0
Reference Number(s): /PA
Service: 2ND DAY AIR
Shipped/Billed On: 06/20/2014
Delivered On: 06/25/2014 5:10 P.M.
Delivered To: 515 N JULIA ST
 JACKSONVILLE, FL, US 32202
Signed By: CURLING

Signed By:

Warden

Location: FRONT DESK

Thank you for giving us this opportunity to serve you.

**Sincerely,
UPS**

Tracking results provided by UPS: 06/27/2014 4:07 P.M. ET



June 20, 2014

Via UPS

City of Jacksonville Police
501 E Bay St
Jacksonville, FL 32202-2927

RE: Heritage Crystal Clean Emergency Procedures

Dear Sir/Madam:

Heritage-Crystal Clean, LLC provides waste management and transportation services to customers in Florida. We are required by regulation to provide a copy of our Emergency Response Plan to local authorities. Please find enclosed a copy of our updated Contingency Plan/ Emergency Response Plan for our facility located at 11643 103rd St., Jacksonville, FL 32210. There has been an update to our emergency coordinator. Our new contact is Jonas Hughes and John Varnadore has been moved to our secondary emergency contact.

Please feel free to contact me with any questions.

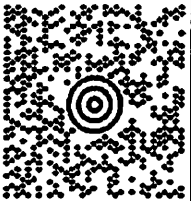

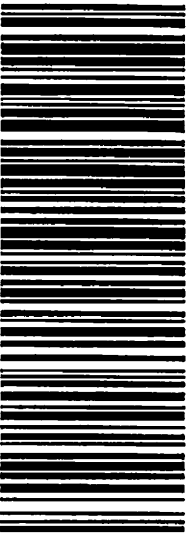

Sincerely,

A handwritten signature in cursive script that reads 'Michelle Walper'.

Michelle R. Walper
Compliance Manager

(847) 783-5355
Michelle.walper@crystal-clean.com

Attachment

MICHELLE WALPHER 847.791.5150 HERITAGE CRYSTAL CLEAN 2175 POINT BLVD ELGIN IL 60123		0.0 LBS LTR	1 OF 1
SHIP TO: CITY OF JACKSONVILLE POLICE 501 E. BAY STREET JACKSONVILLE FL 32202-2927			
		FL 322 9-22 	
UPS 2ND DAY AIR 2 TRACKING #: 1Z 41A 2R6 02 9945 7783			
			
BILLING: P/P			
Reference # 2: /pa		CS 16.2.01. VNTIE70 57.0A 04/2014  TM	



Dear Customer,

This notice serves as proof of delivery for the shipment listed below.

Tracking Number: 1Z 41A 2R6 02 9945 778 3
Reference Number(s): /PA
Service: 2ND DAY AIR
Shipped/Billed On: 06/20/2014
Delivered On: 06/25/2014 12:23 P.M.
Delivered To: 501 E BAY ST
 JACKSONVILLE, FL, US 32202

Signed By: EDWARDS

Handwritten text: *Handwritten signature*

Location: DOCK

Thank you for giving us this opportunity to serve you.

**Sincerely,
UPS**

Tracking results provided by UPS: 06/27/2014 4:06 P.M. ET



June 20, 2014

Via UPS

Shands Jacksonville Hospital
655 W 8th St Ste 1
Jacksonville, FL 32209

RE: Heritage Crystal Clean Emergency Procedures

Dear Sir/Madam:

Heritage-Crystal Clean, LLC provides waste management and transportation services to customers in Florida. We are required by regulation to provide a copy of our Emergency Response Plan to local authorities. Please find enclosed a copy of our updated Contingency Plan/ Emergency Response Plan for our facility located at 11643 103rd St., Jacksonville, FL 32210. There has been an update to our emergency coordinator. Our new contact is Jonas Hughes and John Varnadore has been moved to our secondary emergency contact.

Please feel free to contact me with any questions.

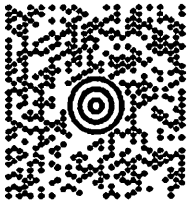

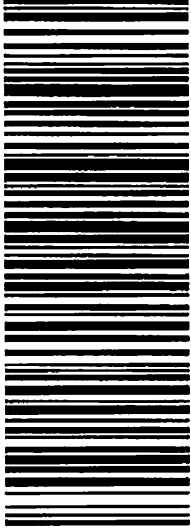

Sincerely,

A handwritten signature in cursive script that reads 'Michelle Walper'.

Michelle R. Walper
Compliance Manager

(847) 783-5355
Michelle.walper@crystal-clean.com

Attachment

MICHELLE WALPER 847-791-5150 HERITAGE CRYSTAL CLEAN 2175 POINT BLVD ELGIN IL 60123	0.0 LBS LTR 1 OF 1
SHIP TO: SHANDS JACKSONVILLE HOSPITAL 655 W. 8TH STREET, SUITE 1 JACKSONVILLE FL 32209-6511	
	FL 322 9-22 
UPS 2ND DAY AIR TRACKING #: 1Z 41A 2R6 02 9907 0191 2	
	
BILLING: P/P	
Reference # 2: /pa	CS 16.2.03. WNTF70 51.0A 04/2014  TM



Dear Customer,

This notice serves as proof of delivery for the shipment listed below.

Tracking Number: 1Z 41A 2R6 02 9907 019 1
Reference Number(s): /PA
Service: 2ND DAY AIR
Shipped/Billed On: 06/20/2014
Delivered On: 06/25/2014 9:31 A.M.
Delivered To: 655 W 8TH ST
JACKSONVILLE, FL, US 32209
Signed By: RODNEY

Signed By: **RODNEY**

Location: INSIDE DELIV

Thank you for giving us this opportunity to serve you.

**Sincerely,
UPS**

Tracking results provided by UPS: 06/27/2014 4:05 P.M. ET

Heritage-Crystal Clean, LLC
Used Oil Halogen Screening

Used oil, including oily water, are collected from customers in two ways. One is our bulk truck collection program. The second is our containerized waste program. The screening approach differs between these two programs.

Bulk Oil Services and Vacuum Services Truck:

Some of our branches have a 3,300 gallon oil route truck or vacuum service truck, or both.

Our vacuum truck picks up oily water, with a focus on oil-water separator materials. Vacuum trucks pick up materials with high solids.

For the oil truck, used oil from an engine repair shop can be picked up without a prequalification sample. For other types of customers, all wastes have a waste stream survey form completed and a sample would be collected and sent to a commercial lab that we contract with. Every load of oil from SQGs and LQGs is also field tested with a Chlor-D-Tect Chlor-1000 field test kit.

For the vacuum services truck, oily water from an engine repair shop can be picked up without a prequalification sample. For other types of customers, all wastes have a waste stream survey form completed and a sample is collected and sent to a commercial lab that we contract with.

For all oil and vac customers, a retain sample is collected at the time of each service. This retain is typically held for 90 days.

All transportation and customer transaction paperwork is scanned and indexed at the corporate office. All analytical and waste approval information is retained in our company computer system. Access to these records can be obtained from any company computer.

Containerized Used Oil:

Containerized used oil can be qualified in our system through a Standard Waste Profile and customer oil certification. Oil containers from our Florida facilities are transported to our Atlanta hub. Current logistics have these containers trans-shipped to our Indianapolis hub. These containers are currently bulked into an oily water tank. The oily water is then sent to a waste water treatment facility for recycling and treatment.

CRYSTAL CLEAN PARTS WASHER SERVICE
HAZARDOUS WASTE
CONTAINER STORAGE INSPECTION CHECKLIST

	M	T	W	TH	F
NO VISIBLE SIGN OF LEAKS OR CORROSION					
CONTAINER PLACED IN CORRECT STORAGE AREA					
ALL CONTAINERS HAVE LIDS AND ARE SEALED PROPERLY					
CONTAINERS LABELED CORRECTLY					
IS ACCUMULATION TIME CLEARLY MARKED ON EACH CONTAINER					
IS EACH WASTE CONTAINER CLEARLY MARKED WITH THE WORDS "HAZARDOUS WASTE"					
COMMENTS:					