USED OIL PROCESSING FACILITY PERMIT APPLICATION

For the Property located at

U. S. LUBRICANTS, LLC
7855 WEST 2ND COURT, BAY 2
HIALEAH, FLORIDA 33012
(PROPERTY FOLIO: 04-2130-040-0010)
EPA I.D. No. FLR 000 213 777
(SITE)

Prepared For

BUSINESS OWNER: MR. JOSE L. FERNANDEZ
U. S. Lubricants, LLC
3636 NW 48 Terrace
Miami, Florida 33142
(CLIENT)

&

MR. BHEEM R. KOTHUR, P.E., DEE
PROFESSIONAL ENGINEER III
HAZARDOUS WASTE PROGRAM AND PERMITTING
FLORIDA DEPARTMENT OF ENVIRONMENTAL PROTECTION
BOB MARTINEZ CENTER
MS# 4560, 2600 BLAIR STONE ROAD
TALLAHASSEE, FLORIDA 32399-2400
TEL: 850-245-8781, FAX: 850-245-8810

Prepared By

GEOTECH ENVIRONMENTAL
Creating Value for Our Clients by Building Relationships Through Integration, Since 1993
7737 N. University Drive, Suite 206, Tamarac, Florida 33321
T: 954 597 9100 F: 954 597 9191
www.GeoTech-usa.com

March 27, 2015

File No. 021503

PROFESSIONAL ENGINEER CERTIFICATION

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.

GEOTECH ENVIRONMENTAL, INC
Irving E. Abcug, P.E. (Florida License No: 28376)

Nilesh Lakhlani

Digitally signed by Nilesh Lakhlani
DN: cn=Nilesh Lakhlani, o=GeoTech Environmental, Inc, ou=Environmental, email=nilesh@geotech-usa.com, c=US
Date: 2015.03.31 11:45:35 -04'00'

GEOTECH ENVIRONMENTAL, INC
Nilesh Lakhlani, Project Manager

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GEOTECH ENVIRONMENTAL, INC
Irving E. Aberg, P.E. (Florida License No: 28376)

GEOTECH ENVIRONMENTAL, INC
Nilesh Lakhlani, Project Manager

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March 27, 2015
File No. 021503
Sent Via: email (Bheem.kothur@dep.state.fl.us) and **U.S. Mail**

Mr. Bheem R. Kothur, P.E., DEE
Professional Engineer III
Hazardous Waste Program and Permitting
Florida Department of Environmental Protection (FDEP/Department)
MS# 4560, 2600 Blair Stone Road
Tallahassee, Florida 32399-2400
Tel: 850-245-8781, FAX: 850-245-8810

Subject: **Used Oil Processing Facility Permit Application for U. S. Lubricants, LLC located at 7855 West 2nd Court. Bay 2, Hialeah, Florida 33012 (EPA I.D. No. FLR 000 213 777)**

Dear Mr. Kothur:

On behalf of Mr. Jose L. Fernandez, Manager with U. S. Lubricants, LLC (Client), GeoTech Environmental, Inc. (GeoTech) is pleased to submit the following documents for the Department review and approval:

1. FDEP Used Oil Processing Facility Permit Application for the operating permit for the U. S. Lubricants, LLC Hialeah, Florida facility (FDEP Application Form 62-710.901(6))
2. FDEP Application Form 62-710.901(7), Used Oil Processing Facility Closing Cost Estimate Form.

The above-mentioned documents are provided in response to the Departments letter dated January 28, 2015 concerning the permit application dated December 08, 2014 (received by the Department on December 30, 2014) and submitted by the Client to operate a Used Oil Processing Facility in Hialeah, Florida. Therefore, these documents constitute further clarification and serve as supplemental information to the original permit application. Our responses that follow are identified with the Department's comment (italic) followed by GeoTech's response. As requested, all documents are provided as one (1) hard copy and one (1) electronic copy in optical media format (CD).

The following items that are not included in the Application are (1) Lease agreement, as the Client has indicated that it has already been provided earlier, (2) Proof that the Contingency Plan has been submitted to all appropriate local agencies, which Client will forward direct to the Department.

Thank you for taking the time to discuss this project with GeoTech and processing this application. Should you have any questions, or require any additional information, please do not hesitate to contact me at 954 597 9100, ext. 24 or via electronic mail at neil@geotech-usa.com.

Very truly yours,

GEOTECH ENVIRONMENTAL, INC

Nilesh Lakhlani
Project Manager

Digitally signed by Nilesh Lakhlani
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Date: 2015.03.31 11:45:08 -04'00'

Pc: Mr. Jose L. Fernandez, Manager, U.S. Lubricants, LLC (joseF@us-lubes.com)

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ATTACHMENTS

DEFINITIONS

1. **CERCLA** - The EPA Comprehensive Environmental Response, Compensation and Liability Act (CERCLA) Information System (CERCLIS) serves to track sites that have come to EPA's attention as having potential for releasing hazardous substances into the environment.
2. **Contamination** means a non-permitted release of a hazardous substance, petroleum substance or product, or polychlorinated biphenyls in sufficient quantity to cause damage to natural resources.
3. **Environmental Site Assessment** is a report usually prepared for a real estate transaction, which identifies potential or existing environmental contamination associated with the property.
4. **Hazardous Substance** means those substances as defined by the Comprehensive Environmental Response, Compensation and Liability Act (CERCLA), 42 U.S.C. 9601(14), and includes any material that is toxic, flammable, explosive, or corrosive as these terms are defined by CERCLA. Excluded from this definition are petroleum substances or products as defined below; and asbestos or asbestos-containing material.
5. **Petroleum Substance or Product** means any material containing refined or crude oil, or any fraction thereof, and includes natural gas and synthetic gas. Hazardous materials are defined above are excluded.
6. **RCRIS** - The EPA Resource Conservation and Recovery Information System serves to track the status of registrations, permits, reports, inspections, enforcement activities, and financial data of those regulated under the Resource Conservation and Recovery Act (RCRA). This system covers RCRA TSD (Treatment, Storage and Disposal) as well as both Large and Small Quantity Generators of hazardous waste.
7. **Release Occurrences -** as defined by CERCLA, 42 U.S.C. 9601 (10), and includes any intentional or accidental discharging, spilling, leaking, pumping, pouring, emitting, injecting, escaping, leaching, dumping, or disposing or emitting into the environment.
8. **Reported -** contamination was documented by interview or in records reviewed.
9. **AST** – Aboveground Storage Tank
10. **UST** - Underground Storage Tanks (UST) serves to track registered USTs within the state.
11. **RCRA-CESQG –** Resource Conservation and Recovery Act and Conditionally Exempt Small Quantity Generators.

ENVIRONMENTAL ACRONYMS

AA	Administering Agency
ACM	Asbestos Containing Materials
AHERA	Asbestos Hazard Emergency Response Act, 1986
AHM	Acutely Hazardous Materials
AQMD	Air Quality Management District
CEG	Certified Engineering Geologist
CERCLA	Comprehensive Environmental Response, Comprehensive Liability Act of 1980 (Federal Superfund), 42 USC 9601 et seq.
CERCLIS	Comprehensive Environmental Response, Compensation, and Liability Information System
CFR	Code of Federal Regulations
EIR	Environmental Impact Report
EIS	Environmental Impact Statement
EPA	Environmental Protection Agency (Federal)
EPA #	Generator # for RCRA manifesting
HMBP	Hazardous Materials Business Plans, H&S Code 25504
HWIS	Hazardous Waste Information System
LUFT	Leaking Underground Fuel Tank
LUST	Leaking Underground Storage Tank
MSDS	Material Safety Data Sheet
NEPA	National Environmental Policy Act
NIOSH	National Institute for Occupational Safety & Health
NPDES	National Pollution Discharge Elimination System (CWA)
NPL	National Priority List (Federal Superfund)
OEA	Office of Environmental Affairs
OSHA	Occupational Safety and Health Administration (Federal)
PCB	Polychlorinated biphenyl
POTW	Publicly-Owned Treatment Works
ppb	part per billion
ppm	part per million
PRP	Potentially Responsible Party (in Superfund site)
RAP	Remedial Action Plan
RCRA	Resource Conservation and Recovery Act (Federal) 42 USC 6902, 40 CFR
R&D	Research and Development
REA	Registered Environmental Assessor
RG	Registered Geologist
RI/FS	Remedial Investigation/Feasibility Study
ROD	Record of Decision (CERCLA)
RP	Responsible Party (CERCLA) 42 UCF 9607(a)
RQ	Reportable Quantity (under DOT CERCLA and SARA Title III)
RWQCB	Regional Water Quality Control Board
SARA	Superfund amendments and Reauthorization Act of 1986 SARA Title III
SB	Senate Bill
SIC	Standard Industrial Classification (company description)
SOP	Standard Operating Procedures
SWA	Solid Waste Act (a/k/a RCRA)
SWMU	Solid Waste Management Unit
TPCA	Toxic Pits Cleanup Act H&S Code 25208 et seq.
TSCA	Toxic Substance Control Act (Federal) 15 USC 2601 et seq.
TSD	Treatment, Storage, and Disposal Facilities (permitted by RCRA) H&S Code 25123.3
TSDF	Treatment, Storage, Disposal Facility (hazardous waste)
UBC	Uniform Building Code
UFC	Uniform Fire Code
UST	Underground Storage Tank
UM	Uniform Manifest
UST	Underground Storage Tanks
VOC	Volatile Organic Compound H&S 25123.6
WDR	Waste Discharge Requirements
WWTP	Wastewater Treatment Plant

SECTION 1

1.0 RESPONSE TO THE DEPARTMENT LETTER DATE JANUARY 28, 2015

Department Comment

1. *Permit Renewal Application Cover Letter dated December 08, 2014: The subject facility I.D. should be identified as "FLR 000 213 777". Please review and correct the subject cover letter as appropriate in future correspondence.*

Response

The subject facility I.D has been identified correctly as "FLR 000 213 777" in this document and will include this information in all future correspondence to the Department. Refer to **Attachment A** for the Used Oil Processing Facility Permit Application (DEP Form 62-710.901(6), incorporated in Rule 62-710.800(3), F.A.C. Effective Date 4-23-13).

2. *Used Oil Processing Facility Permit Application, Part I, Item 4, Date current operation began, Page 1 of 8: It appears that the facility identified as "30 days from January 08, 2015". Please make a note that the facility can begin operation only upon issuing the final permit. Upon issuing the permit, please update and re-submit the 8700-12 FL Form.*

Response

The Client has noted the Department's comment and is affirming that although all equipment have been installed at the facility, it has not begun operations, and will only do so upon obtaining final permit approval from the Department. Upon receiving permit approvals, we will re submit the FDEP form 8700-12FL FDEP Form 62-730.900(1)(b), adopted by reference in Rule 62-730.150(2)(a), 62-710.500(1), and 62-737.400(3)(a)2., F.A.C. (Effective Date 04-23-2013)

3. *Used Oil Processing Facility Permit Application, Part I, Item 5, Page 1 of 8: Please revise the Facility Name to "U.S. Lubricants, LLC" not "U.S. Lubricant, LLC".*

Response

The facility name has been revised as shown in the Used Oil Processing Facility Permit Application in **Attachment A**.

4. *Used Oil Processing Facility Permit Application, Part I, Item 13, Site Ownership Status, Page 2 of 8: Please update the lease expiration date upon lease agreement.*

Response

The Client is leasing the premises from Commercial Management Group, Inc. (Landlord) from June 2014 to June 2016. Client has indicated that a copy of the lease agreement was provided to the Department by USL in their previous submittal.

5. Used Oil Processing Permit Application, Part I, B. Site Information, Item 2. Facility size: Please review the facility size (1500 SF or 1383 SF), and revise as appropriate.

Response

The facility leased by the Client from the Landlord is approximately, 0.03 acres, which has been revised in the permit application.

6. Application form for a Used Oil Processing Permit, Part II-Certification, Pages 5 through 8: Please revise the Facility Name to "U.S. Lubricants, LLC" not "U.S. Lubricant" throughout. Also, identify the EPA ID Number on all the Certification Pages.

Response

The company name, "U.S. Lubricants, LLC" has been revised in all required documents. The EPA ID Number is included on all certification pages.

7. Attachment # 1, Detailed Facility Site Plan and Processes Description: Please provide the Facility Process Flow Diagram, USGS Topographic Map (Site location map), and FEMA Flood Zone Map.

Response

The Department should refer to the "List of Figures" titled **Figure 1** for the USGS Topographic Map, **Figure 2** for the Facility Site Plan, **Figure 3** for the Process Flow Diagram, and **Figure 4** for the FEMA Flood Zone Map. The process description is described in **Attachment B**. A brief description of the facility operation is labeled as **Attachment C**.

8. Attachment #1, Facility Detailed Processes Description Sheet 1 of 1, Process Flow Map: Please provide the detailed calculations for estimating secondary containment for the Tank Storage Area. The Processes Flow Map should also identify Evacuation Routes and gathering places during an emergency situation.

Response

The two ASTs; 295-gallon double-walled used oil (Tank #1 & Photos 3 & 12) and 295-gallon double-walled New Oil AST (Tank #2 & Photos 3 & 4) shown in **Figure 2** are shop fabricated double-walled storage tanks and as per Rule 62-762, F.A.C. do not require secondary containment. As an added precaution, the Client has elected to place these ASTs within the secondary containment area as shown in **Figure 2** and **Photos 16** & **17**. Refer to **Table 1** for the Storage Tank information. Refer to **Attachment D** for the facility detailed process description and **Attachment E** for the Site Photographs taken by GeoTech on January 29, 2015 and subsequently on March 18, 2015.

The LYE-1000 regeneration system is a mobile system that consists of a 300-gallon single-walled reaction tank (Tank #3 and Photo7), oil pumps, piping flow lines, vacuum pumps, filters, and filter presses, which could have the potential to leak and discharge oil to the existing 6-inch concrete slab. The SPCC regulations in 40 CFR §112.7(c) require facilities to provide appropriate containment or diversionary structures or equipment to prevent discharges as described in §112.1(b). GeoTech has determined that the general containment (areas with potential for discharge, such as piping–including flow lines, bulk storage containers, oil-filled operating and manufacturing equipment) is required for the area designated as the Used Oil Processing/Regenerating Area and shown in **Figure 3**, the Facility Process Flow Map.

A secondary containment system will provide an essential line of defense in the event of a failure of the primary containment, such as a bulk storage container, a mobile or portable container, piping, or oil-filled equipment (see **Figure 5** for the Secondary Containment). The system provides temporary containment of discharged oil until the appropriate actions are taken to abate the source of the discharge and remove oil from areas where it has accumulated to prevent it from reaching soil, navigable waters or groundwater. Refer to **Table 2** for the secondary containment calculation for this area. The dimensions of the secondary containment area is 20-feet long by 8 feet wide by 0.5 feet high. Refer to **Figures 5** that show details of the secondary containment**,** evacuation routes, and gathering places during an emergency situation. A secondary containment berm, approximately thirteen (13) feet long by three (3) inches wide by three (3) inches high has been constructed with concrete to encapsulate the any oil escaping site via the existing Rolling Door area as shown in **Figure 2** and Photo 18. The interior walls and the subfloor of both containments are sealed with a compatible epoxy and/or sealer for positive protection from used oil penetrating the concrete pores. Refer to Photos 16, 17, & 18 showing the containments present at the site.

9. Attachment #2, Types of Products Collected: Please identify storage of used automotive coolants on Sheet 1 of 1.

Response

At the Hialeah facility, USL will only accept used oil[1]. Common examples of used oil will include used crankcase (engine) oil. USL will not collect automotive coolant.

10. Attachment #2, Detailed Process Flow Description: The facility should include details of petroleum contact water (PCW) management practices, including descriptions of product receipt, water separation and shipment of reclaimed product to the ultimate user or to another recycler. Compliance is a concern regarding identification of gasoline/diesel mixtures. Please see Comment 29 in this document regarding information for compliance and training per US Department of Transportation (USDOT) regulations.

Response

In accordance to the definition of Petroleum Contact Water (PCW) in the Rule 62-740, F.A.C, USL will not receive any PCW at the Hialeah facility as the LHE-1000 cannot treat PCW. However, it is possible that used oil may be in contact with or become contaminated with some residual water, however, this minimal amount of water will be removed thru evaporation during the oil regeneration process. Therefore, there is no reason for USL to store any PCW on site.

The Department's Comment 29 regarding information for compliance and training per US Department of Transportation (USDOT) regulations is noted. USL employee training program will include the USDOT hazardous materials training program. Refer to **Attachment F** for the Employee Training Program.

11. Attachment #3, Waste Analysis plan, and Sampling Plan, On-Specification Claim: The 40 Code of Federal Regulations (CFR) 279.11, on-Specification Criteria, Analytical Testing: Waste analysis plan is inadequate. Every batch of recycled oil generated by the processor equipment shall be tested to demonstrate that the following criteria are met: Arsenic 5 ppm maximum, Cadmium 2 ppm maximum, Chromium 10 ppm maximum, Lead 100 ppm maximum, Sulfur 0.4% maximum, Flash Point 100 degrees Fahrenheit (F) minimum, Total Halogens 1,000 ppm maximum, PCB 2 ppm maximum, and maximum Halides 4,000 ppm. The waste analysis plan does not specify

[1] The term "used oil" means any oil refined from crude oil or synthetic oil, that: (A) has been used and as a result of such use is contaminated by physical or chemical impurities; or (B) is no longer suitable for the services for which it was manufactured due to the presence of impurities or a loss of original properties. This includes both used and unused oils that are being discarded.

frequency or the parameters that will be analyzed by the lab. Marketing of On-Specification Oil: All on-specification certified used oil sold by U.S. Lubricants, LLC shall be analyzed by a Department of Health (DOH) Environmental Laboratory Certification Program (ELCP) certified laboratory in solid and chemical matrix for the analytical and test combinations to be performed. U.S. Lubricants, LLC shall be in receipt of the laboratory analytical results before selling the selected batch of used oil as "on-specification" oil. Also, please clarify that the Cliff Berry Inc. Environmental Services Laboratory is certified by the National Environmental Laboratory Accreditation Program (NELAP). Also, there is no discussion of testing for water content amount. Also, the sample sent to a lab for on–specification used oil determination should be sampled for the parameters indicated in 40 CFR Part 279.11, and 279.55. Please add Sulfur, and Total Halides parameters to the analytical list. Please explain and or provide Rebuttable Presumption Analysis Flow Chart to the Application.

Response

Refer to the Waste Analysis and Sampling Plan in **Attachment G** that discusses how the used oil received and new on-specification certified oil sold by USL will be analyzed. **Table 3** provides for the used oil not exceeding any allowable level limits and **Table 4** summarizes the sampling parameters that may be required for the oil & sludge analysis.

USL will only use the Department of Health (DOH) Environmental Laboratory Certification Program (ELCP) certified laboratory in solid and chemical matrix for the analytical and test combinations to be performed. Also, all analytical testing will be conducted and certified by laboratories such as PACE Environmental Laboratory, Inc. and/or Advanced Environmental Laboratory, Inc. that are accredited under the National Environmental Laboratory Accreditation Program (NELAP).

12. Attachment #4, Sludge And Residue Management: A hazardous waste determination will be conducted for any oily wastes or sludge generated at the facility that cannot be managed for energy recovery, and the materials will be managed in accordance with 40 CFR Part 279.10(c) and (e). Also, correct the spelling of "sludge" from "slude".

Response

As discussed in the Waste Analysis and Sampling Plan in **Attachment G**, USL will make a hazardous waste determination for any oily waste or sludge generated at the facility that cannot be managed for energy recovery, and all such materials will be managed in accordance with 40 CFR Part 279.10(c) and (e). The spelling of "sludge" has been corrected in all documents.

13. Attachment 5, Tracking Plan, Record Keeping and Reporting Requirements: Please correct the company name as "U. S. Lubricants, LLC" not "U. S. Lubricant, LLC" on Uniform Waste Transporters Manifest Form.

Response

Refer to **Attachment H** for the Tracking Plan prepared in accordance to the Title 40 Code of Federal Regulations Chapter 1 Subchapter 1 Part 279 subpart F 279.56.

The business name, "U. S. Lubricants, LLC" has been corrected on the Uniform Waste Transporters Manifest Form and included as **Table 5**. The Uniform Waste Transporters Manifest will be used to keep a record of each used oil shipment accepted for processing. These records will be maintained at the site for three (3) years. USL may also utilize (if necessary), the Departments' Used Oil and Used Oil Filter Record Keeping Form 62-710.901(2) and incorporated in Rule 62-710.510, F.A.C listed as **Table 6**.

14. Attachment #6, Preparedness and Prevention Plan, Contingency Plan and SPCC Plan: Please add Hazardous Materials Clean-up Contractor and Alternate Emergency Coordinator Cell phone numbers. Also, add the Emergency Agencies address to the list.

Response

Refer to the Preparedness and Prevention Plan included as **Attachment I**, Contingency Plan included as **Attachment J**, and the SPCC Plan included as **Attachment K**. The Hazardous Materials Clean-up Contractor and Alternate Emergency Coordinator Cell phone numbers, and the Emergency Agencies addresses has been added as shown in **Table 9**.

15. Attachment #6, Waste Tracking Documents: Facility must provide a sample field documentation form that you will use for sampling and recordkeeping. Also, the facility must maintain a sample log noting the date and time of sampling, the name of the sampler, the containers or tanks sampled, analytes, the lab analysis number for cross reference, etc. This is so that every sample can be tracked to its analysis, and every analysis can be tracked to a specific sample. Please see Chapter 62-160, Florida Administrative Code (F.A.C.), for quality assurance, methodological and reporting requirements required by the Florida Department of Environmental Protection (DEP).

Response

Refer to **Table 5** for a sample of USL's used oil manifest for sampling and recordkeeping utilized for the receipt of Used Oil to track the collection and delivery of used from and to their clients. Additionally, and if required, USL will also use the Departments Used Oil and Used Oil Filter Record Keeping Form shown as **Table 6.**

USL will maintain this log for each client noting the date and time of sampling, the name of the sampler, the containers or tanks sampled, analytes, the lab analysis number for cross reference, etc. **Table 5** provides for specific sample tracked to its analysis and by each client. Field sampling will be performed in accordance to the Chapter 62-160, Florida Administrative Code (F.A.C.), for quality assurance, methodological and reporting requirements required by the Florida Department of Environmental Protection (DEP). All laboratory analysis if required, will be attached to this table for record keeping for a minimum of three years.

16. Attachment 7, Contingency Plan, SPCC Plan: Facility has listed contact numbers for the police and EMTs. In addition to this, please provide the DEP-24 hour emergency numbers (850) 413-9911, and (800) 320-0519. During

normal business hours, the DEP district office may be contacted at (561) 681-6600. Facility may list both and instruct their personnel which number to call, but both numbers need to be there. Also need to include your outside cleanup contractor information here. Facility's primary and secondary emergency coordinators phone numbers and home mailing address must be included. Please review and revise as appropriate.

Response

Refer to **Table 9** that provides all emergency contact list for this facility. The Department and outside cleanup contractor information has been updated in **Table 9**. Also, the facility's primary and secondary emergency coordinators phone numbers and home mailing address is included.

17. Attachment 7, Contingency Plan/SPCC Plan/ Spill Prevention Control, and Counter Measure Plan: The plan should be prepared and Certified by a Professional Engineer Registered in the State of Florida. Please refer to 40 CFR Part 112.7

Response

The Contingency Plan shown in **Attachment J** and the Spill Prevention Control, and Counter Measure Plan included in **Attachment K** were prepared under the direction of and Certified by Irving E. Abcug, P.E. (Florida License No: 28376), a Professional Engineer registered in the State of Florida. The cover page attests to this certification.

18. Attachment 7, Contingency Plan/SPCC Plan: A proper Contingency Plan needs to be prepared and submitted to the Department that meets the standards in 40 CFR Part 279.52(b). These are some of the missing items: The address of the secondary emergency coordinator is not provided; there is no statement indicating that the emergency coordinators are authorized to commit funds in the event a spill they cannot handle without outside help occurs. Any spill over 25 gallons on a pervious surface should be reported to DEP within 24 hours and a written report should be submitted to DEP within 15 days, not 60 days. A copy of the updated Contingency Plan needs to be sent to all the appropriate departments and agencies upon approval this application. The receipts showing delivery of the previous Contingency Plan to the local authorities were provided; however, since the previous Contingency Plan was deficient, the facility needs to provide receipts of delivery to the local authorities of the revised compliant Contingency Plan.

Response

The Department should refer to the Contingency Plan shown in **Attachment J** that meets the standards discussed in the 40 CFR Part 279.52(b). In addition, additional information requested above by the Department has been included in the Contingency Plan. A copy of the updated Contingency Plan will be sent to all the appropriate departments and agencies upon approval this application and receipts showing delivery of the revised compliant Contingency Plan will be provided by the Client as a separate document.

19. Attachment 7, Contingency Plan and SPCC Plan: Please show the location of all emergency equipment on a map.

Response

The Department should review **Figure 5** indicating the location of the emergency equipment listed in **Table 7**.

20. Attachment 7, Contingency Plan, SPCC Plan, Record Keeping And Reporting, State & Local Agencies: Please update the FDEP Tallahassee (normal business hours) phone number to read (850) 245-8707; the State Warning Point (24–hour spill contact) phone number to read: (800) 320-0519; and EPA Emergency Response (Atlanta) phone number to read: (404) 562-8700.

Response

The FDEP Tallahassee (normal business hours) phone number (850) 245-8707; the State Warning Point (24–hour spill contact) phone number: (800) 320-0519; and EPA Emergency Response (Atlanta) phone number: (404) 562-8700 have been included in **Table 9**.

21. Attachment 7, Contingency Plan, SPCC Plan: Please provide the physical mailing addresses for all agencies.

Response

Table 9 provides the physical mailing addresses for all agencies.

22. Attachment 7, Contingency Plan, SPCC Plan, Emergency Contacts: Please add the Oil Spill Contractor name and their emergency contact phone numbers. Also, add local addresses for all Emergency Contacts to the list.

Response

Table 9 shows the Oil Spill Contractor's name and their emergency contact phone numbers. Also, the local addresses for all Emergency Contacts is added to the list in **Table 9**.

23. Attachment 7, Spill Prevention, Control, And Countermeasure Plan, Fire Protection And Emergency Action Plan, Statement Of Policy: The policy statement must be signed by the appropriate facility manager.

Response

The Spill Prevention, Control, And Countermeasure Plan, And Emergency Action Plan, Statement of Policy is signed by U.S. Lubricants, LLC, Owner/Operator/Manager.

24. Attachment #8, Unit Management Description: The facility and tank inspection indicates only monthly inspections. Please also provide the documentation for daily/weekly and annually performed inspections. Also, please explain how you check for the presence of water at the lowest possible points inside the tanks and how water found in these tanks is removed and handled.

Response

Refer to **Table 12** for a summary of the facility's Weekly and Monthly tanks, equipment, and secondary containment inspections. Based on The Clients information, water is not anticipated to be found inside the tanks, LYE-1000, and the secondary containment.

25. Attachment 9, Closure plan: The closure plan does not provide an adequate time table. The Department should be notified at least 30 days before closure begins. The plan must provide a better description of the decontamination procedure. The plan must indicate that all waste will be shipped off-site before closure begins. It also needs to indicate where samples will be taken to ensure proper decontamination of the facility. The facility shall propose vertical and horizontal soil sampling (including parameters) around all waste handling areas to determine if any contamination exists. Also, propose groundwater sampling which may be contingent upon results of soil sampling. The closure cost estimates should address these items.

Response

The Closure Plan is included in **Attachment L** that addresses the Department's comments discussed above. Please note that the cost estimate and the forms is included in **Table 11** of this report.

26. Attachment 9, Closure Plan- Closure Cost Estimates: Facility must provide the detailed closure cost estimates Form, accessible at http://www.dep.state.fl.us/waste/quick_topics/forms/pages/62-710.htm. The cost estimate form must be certified by Engineer and Owner/Operator as appropriate.

Response

The Department should refer to **Table 11** for a copy of the detailed Closure Cost Estimates Form, which is certified by GeoTech Engineer and the U.S. Lubricants, LLC Owner/Operator.

27. Attachment #9, Closure Plan, Closure of Tank Storage: All wastes need to be tested for hazardous waste characteristics. Please revise as appropriate.

Response

The Closure Plan in **Attachment L** describes how the hazardous waste and other materials will be characterized and analyzed for proper storage, handling and disposal purposes. **Table 11** provides detailed closure cost estimates for such activities.

28. Attachment #9, Closure Plan, Closure Cost Estimate: The facility shall propose vertical and horizontal soil sampling (including parameters) around all waste handling areas to determine if any contamination exists. Also, propose groundwater sampling which may be contingent upon results of soil sampling. The closure cost estimate should address these items. The cost estimates should be prepared and certified by a Professional Engineer (P.E.) registered in State of Florida.

Response

The Closure Plan in **Attachment L** describes the soil assessment activities to determine the horizontal and vertical extent of soil contamination, if any. **Table 11** provides detailed closure cost estimates for such activities. Should soil contamination be found, groundwater assessment may be required, which is also discussed in the Closure Plan and costs are summarized in **Table 11**.

29. Attachment #10, Personnel Training or Employee Training: This Section needs to be expanded to include the training records, including name of the employee, date, and type of training. The employee training program does not include USDOT hazardous materials training. Used Oil is commonly contaminated with gasoline, and the mixture may be flammable. U. S. Lubricants, LLC used oil screening procedure from the waste analysis plan only includes halogen screening. Chlor-D-tect kits will not assess the flammability of the materials that U. S. Lubricants, LLC may be called upon to transport. Please modify the employee training program to include USDOT hazardous materials training.

Response

The Department should refer to **Attachment F** for the Employee Training information. Currently, as indicated in **Table 7**, only one employee; Howard Sanchez is involved in the facility operations and no training records exist for anyone. This section will be amended to include the training records, including name of the employee, date, and type of training.

30. Attachments #1 through #10: Please paginate all these attachments as appropriate.

Response

The Departments comment above has been noted and appropriate pages have been paginated.

31. Addendum #1, LYE-1000 Engine Oil Recycling System, Operation Manual, LYE-1000 Flow Chart: The flow chart is not legible. Please review and resubmit as appropriate.

Response

The Department should refer to **Figure 6** for The LYE-1000 Engine Oil Recycling System flow chart and additional information on the system.

32. Facility needs to submit a site map in an electronic format (pdf preferred) so that this map can be added to the permit.

Response

All Figures 1 thru 6 in this document are provided in an electronic format (pdf) for the Department's use as appropriate.

33. Facility needs to submit a used oil tank table in an electronic format (pdf preferred) so that this table can be added to the permit.

Response

The Department should refer to **Table 1** in this document that is provided in an electronic format (pdf) for Department's use as appropriate.

34. Solid Waste Permit Application: The facility expressed their interest, through a conference call on January 16, 2015, to obtain a combined Used Oil/Solid Waste permit to operate solid waste operations such as bulking and solidification of oily waste and petroleum impacted soil and groundwater, citing reference to the used oil application for the further required details. However, the details provided in the used oil application with respect to the bulking, solidification, and management of non-hazardous oily wastes were not adequate to address the items for that type of permit application. Therefore, DEP explained about the Solid Waste Permit Application, Short Version, 62-701.900(4), F.A.C., and the permit fee of $2,000.00 required to process. Please review and let me know your thoughts and decisions.

Response

U.S. Lubricants, LLC will not be requiring a Solid Waste Permit at this time.

35. Please provide a Table of Content to identify all the Attachments.

Response

The Table of Content that identifies all the Attachments is included in this document.

36. All submittals in response to this NOD shall be provided as one (1) hard copy and one (1) electronic copy in optical media format (CD/DVD) sent to:

Response

On behalf of U.S. Lubricants, LLC, GeoTech will be mailing via US mail one (1) hard copy and one (1) electronic copy in optical media format (CD/DVD) to the Department.

LIST OF FIGURES

FIGURE 1

SITE TOPOGRAPHIC MAP

3-D TopoQuads Copyright © 1999 DeLorme Yarmouth, ME 04096

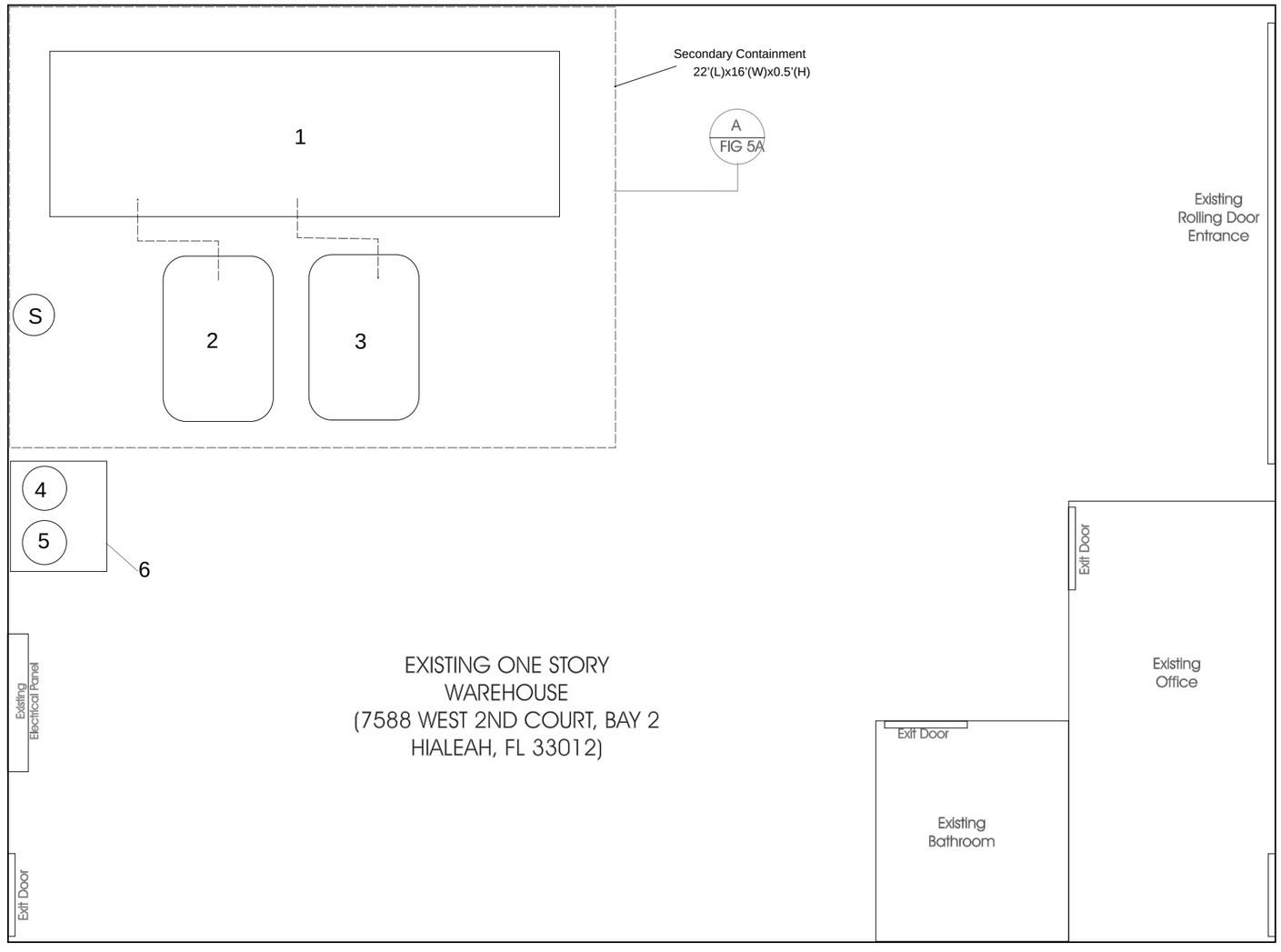
1000 ft Scale: 1 : 34,375 Detail: 12-4 Datum: WGS84

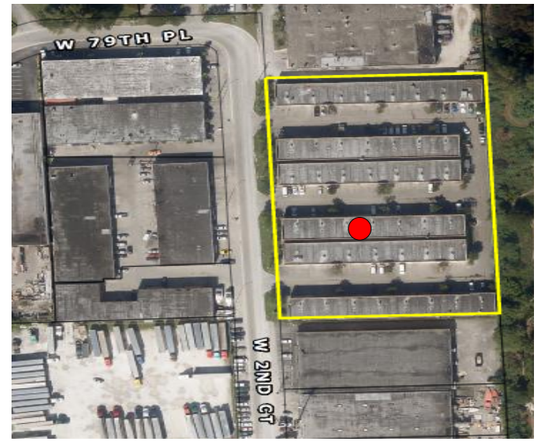
File Name/Path: U.S. LUBRICANTS, LLC\021503

GEOTECH ENVIRONMENTAL	CLIENT: U.S. LUBRICANTS, LLC 3636 NW 48 TERRACE MIAMI, FL 33142	SITE ADDRESS: U.S. LUBRICANTS, LLC 7855 WEST 2ND COURT, BAY 2 HIALEAH, FL 33012	SHEET NAME: SITE TOPOGRAPHIC MAP	PROJECT No.: 021503 DATE: 02-4-15 SHEET NO.: FIGURE 1

FIGURE 2

SITE LAYOUT MAP





PROPERTY INFORMATION

Folio: 04-2130-040-0010
Sub-Division:
KRISTINAS TRACT
Property Address
7805 W 2 CT
Hialeah , FL 33014-4309
Owner
COMMERCIAL MGMT GROUP LLC
Mailing Address
7901 W 25 AVENUE BAY 3 & 4
HIALEAH , FL 33016
Primary Zone
7100 INDUSTRIAL - LIGHT MFG
Primary Land Use
4837 WAREHOUSE TERMINAL OR STG : WAREHOUSE

LEGEND

1 - LYE-1000 Engine Oil Recycling System
2 - 295-Gallon Double-walled Used Oil AST
3 - 295-Gallon Double-walled New Oil AST
4 - 55-Gallon FDOT drums for storage of residual sludge from LYE-1000
5 - 55-Gallon drums for chemical additives (Chemical Storage)
6 - Spill Containment Pallet

(S) Spill Kit

File Name/Path

REVISIONS:
DATE:
BY:

GEOTECH ENVIRONMENTAL

CLIENT NAME:
U.S. LUBRICANTS, LLC
3636 NW 48 TERRACE
MIAMI, FL 33142

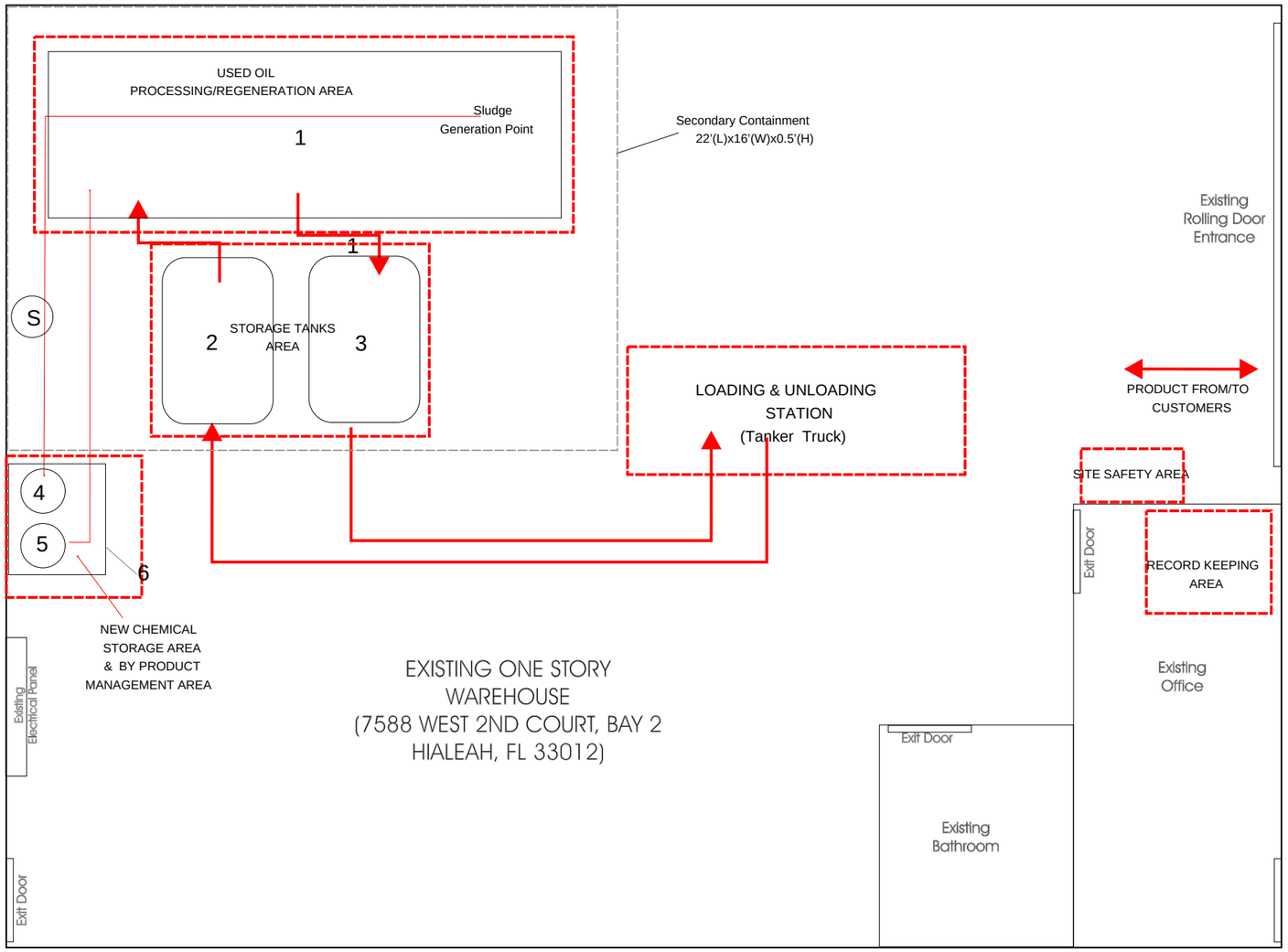
SITE ADDRESS:
U.S. LUBRICANTS, LLC
7855 WEST 2ND COURT, BAY 2
HIALEAH, FL 33012

SHEET TITLE:
FACILITY SITE PLAN

PROJECT NO.: 021503
DATE: 02-06-15
SHEET NO.: FIGURE 2

FIGURE 3

PROCESS FLOW DIAGRAM



LEGEND

1 - LYE-1000 Engine Oil Recycling System
2 - 295-Gallon Double-walled Used Oil AST
3 - 295-Gallon Double-walled New Oil AST
4 - 55-Gallon FDOT drums for storage of residual sludge from LYE-1000
5 - 55-Gallon drums for chemical additives (Chemical Storage)
6 - Spill Containment Pallet

NOTE: THE FACILITY PROCESS FLOW IS DISCUSSED IN ATTACHMENT B

File Name/Path

REVISIONS:	
DATE:	
BY:	

GEOTECH ENVIRONMENTAL

CLIENT NAME:
U.S. LUBRICANTS, LLC
3636 NW 48 TERRACE
MIAMI, FL 33142

SITE ADDRESS:
U.S. LUBRICANTS, LLC
7855 WEST 2ND COURT, BAY 2
HIALEAH, FL 33012

SHEET TITLE:
FACILITY PROCESS
FLOW MAP

PROJECT NO.:	021503
DATE:	02-06-15
SHEET NO.:	FIGURE 3

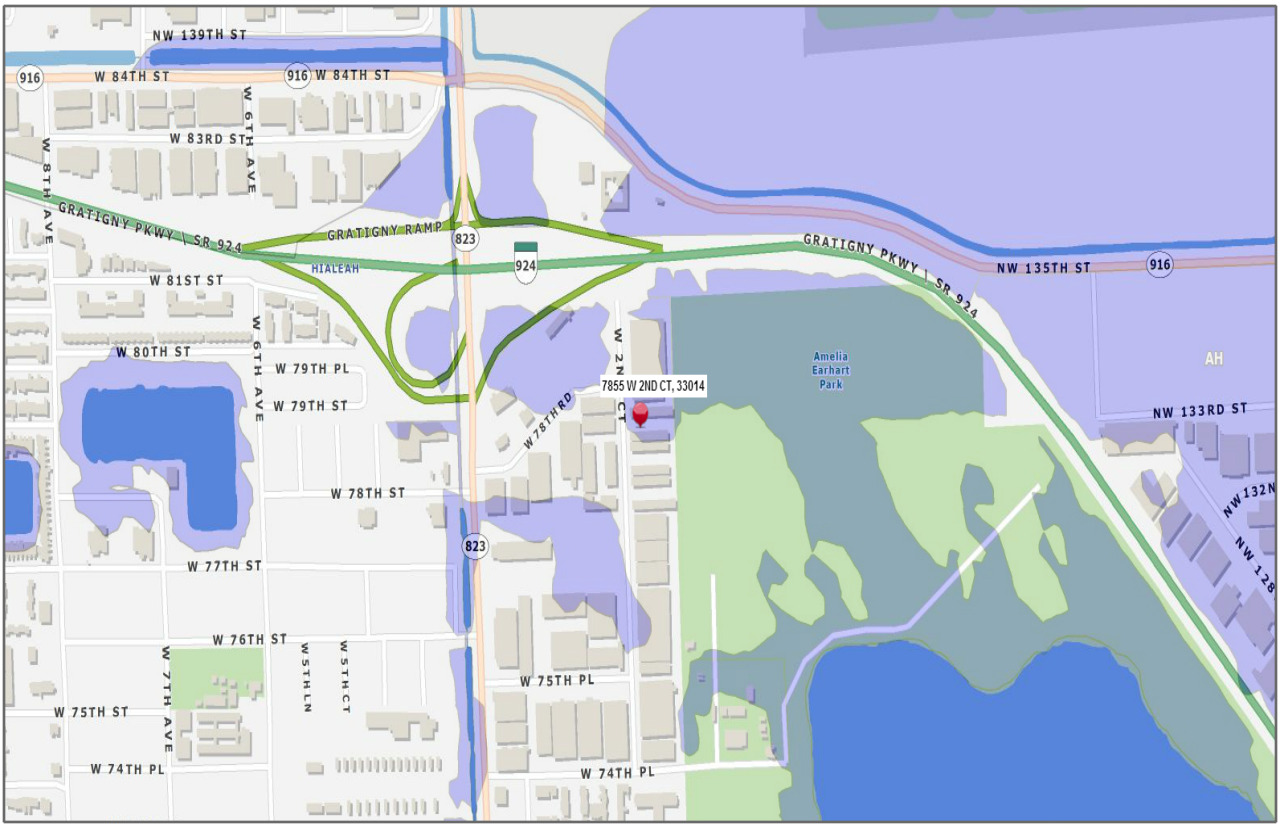
FIGURE 4

FEMA FLOOD ZONE MAP

FIGURE 4. FLOOD ZONE MAP

Flood Zones

Flood Zone for:7855 W 2ND CT, 33014



ZONE	Elevation
AH	7
Total Flood Zones	1

Designations:

Flood Zones	What does it mean?*
0.2 PCT ANNUAL CHANCE FLOOD HAZARD	An area inundated by 2% annual chance flooding. No Base Flood Elevations or depths are shown within this zone. Insurance purchase is not required in these zones.
A	Zone A is the flood insurance rate zone that corresponds to the 100-year floodplains that are determined in the Flood Insurance Study by approximate methods. Because detailed hydraulic analyses are not performed for such areas, no Base Flood Elevations (BFEs) or depths are shown within this zone. Mandatory flood insurance purchase requirements apply.
AE	Zone AE is the flood insurance rate zone that corresponds to the 100-year floodplains that are determined in the Flood Insurance Study by detailed methods. In most instances, Base Flood Elevations (BFEs) derived from the detailed hydraulic analyses are shown at selected intervals within this zone. Mandatory flood insurancepurchase requirements apply.
AH	Zone AH is the flood insurance rate zone that corresponds to the areas of 100-year shallow flooding with a constant water-surface elevation (usually areas of ponding) where average depths are between 1 and 3 feet. The Base Flood Elevations (BFEs) derived from the detailed hydraulic analyses are shown at selected intervals within this zone. Mandatory flood insurance purchase requirements apply.

printed: 2/19/2015

Flood Zones

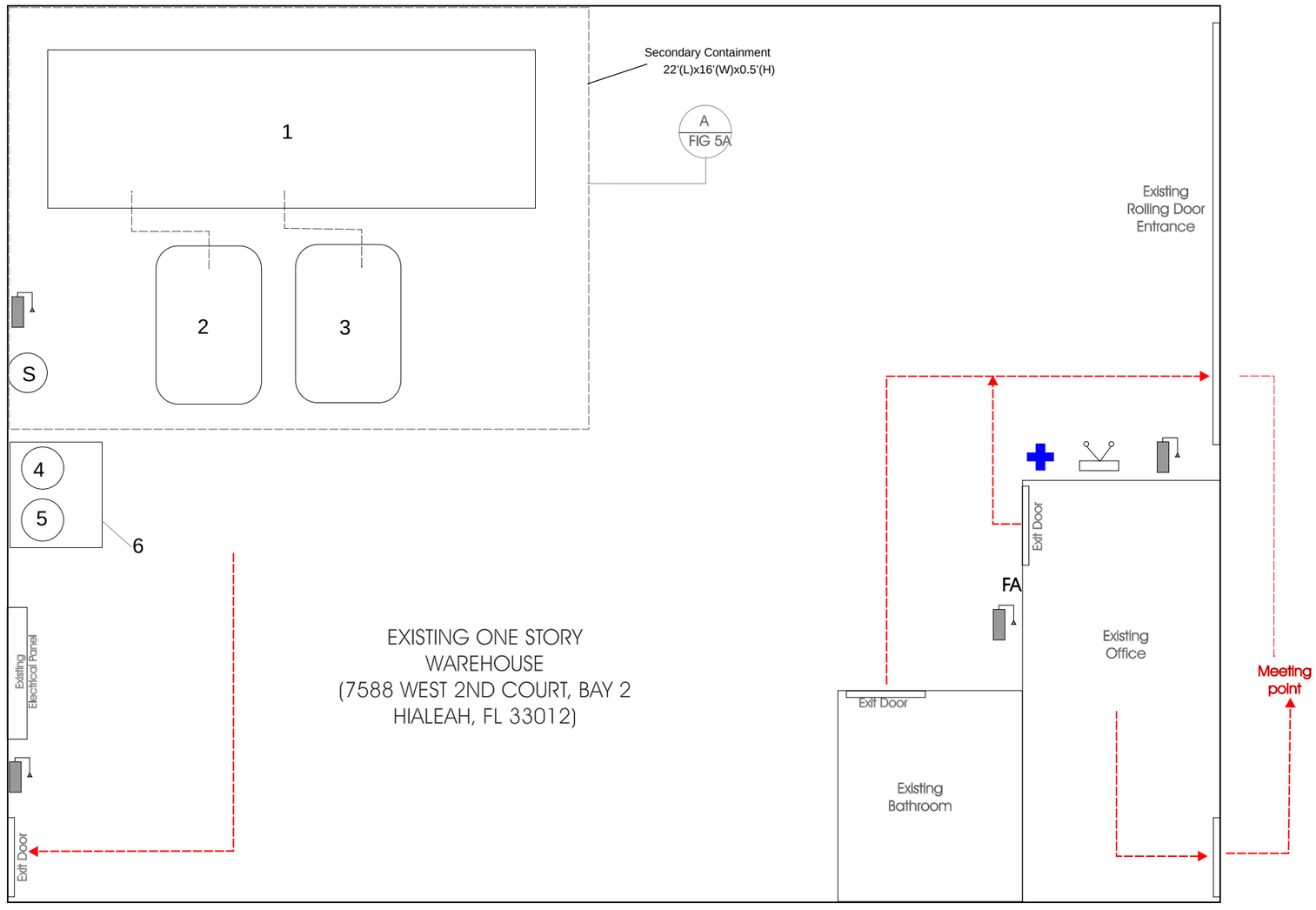
D	Areas with possible but undetermined flood hazards. No flood hazard analysis has been conducted. Flood insurance rates are commensurate with the uncertainty of the flood risk.
Open water	Open Water: large lakes, bay, ocean.
VE	Zone VE is the flood insurance rate zone that corresponds tothe 100-year coastal floodplains that have additional hazards associated with storm waves.Base Flood Elevations (BFEs) derived from the detailed hydraulic analyses are shown at selected intervals within this zone. Mandatory flood insurance requirements apply.
X	Zone X is the flood insurance rate zone that corresponds to areas outside the 100-year floodplains, areas of 100-year sheet flow flooding where average depths are less than 1 foot, areas of 100-year stream flooding where the contributing drainage area is less than 1 square mile, or areas protected from the 100-year flood by levees. No Base Flood Elevations (BFEs) or depths are shown within this zone.

* Definitions were provided by the Federal Emergency Management Agency (FEMA -->http://www.fema.gov).

printed: 2/19/2015

FIGURE 5

EVACUATION MAP



LEGEND

- Eye Wash Station
- First Aid Kit
- Evacuation Route
- Fire Extinguisher
- (S) Spill Kit
- FA Fire Alarm

1 - LYE-1000 Engine Oil Recycling System
2 - 295-Gallon Double-walled Used Oil AST
3 - 295-Gallon Double-walled New Oil AST
4 - 55-Gallon FDOT drums for storage of residual sludge from LYE-1000
5 - 55-Gallon drums for chemical additives (Chemical Storage)
6 - Spill Containment Pallet

File Name/Path:

REVISIONS:	
DATE:	
BY:	

GEOTECH ENVIRONMENTAL

CLIENT NAME:
U.S. LUBRICANTS, LLC
3636 NW 48 TERRACE
MIAMI, FL 33142

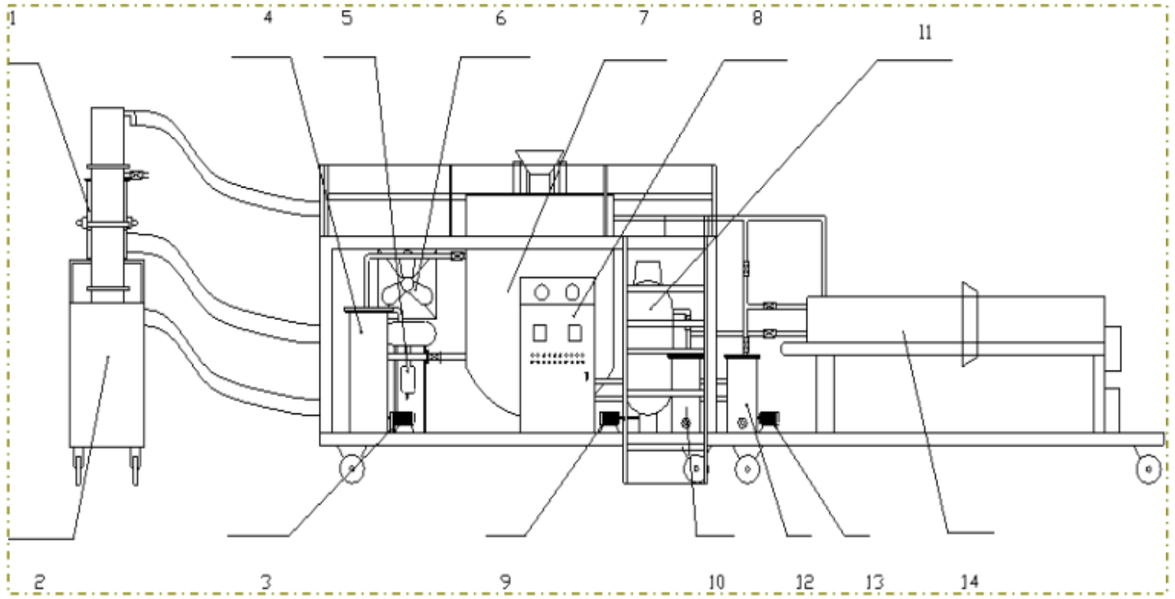
SITE ADDRESS:
U.S. LUBRICANTS, LLC
7855 WEST 2ND COURT, BAY 2
HIALEAH, FL 33012

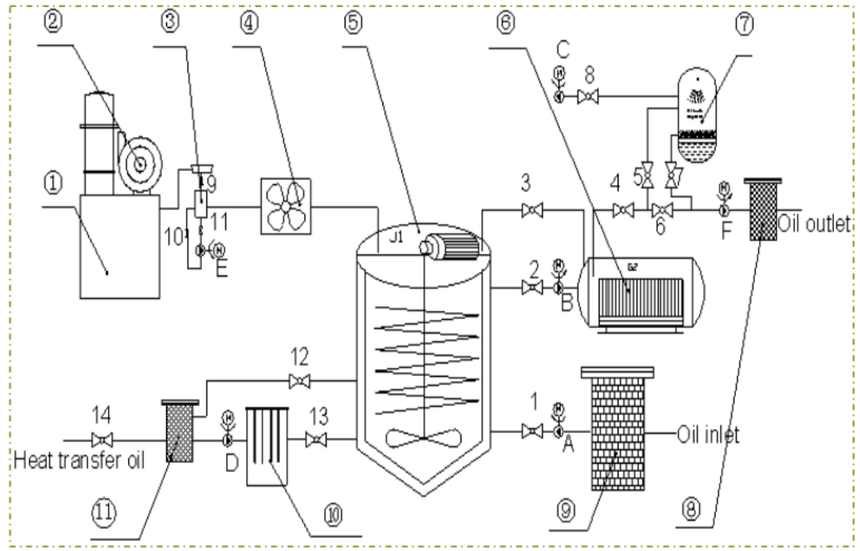
SHEET TITLE:
EVACUATION MAP

PROJECT NO.:	021503
DATE:	02-06-15
SHEET NO.:	FIGURE 5

FIGURE 6

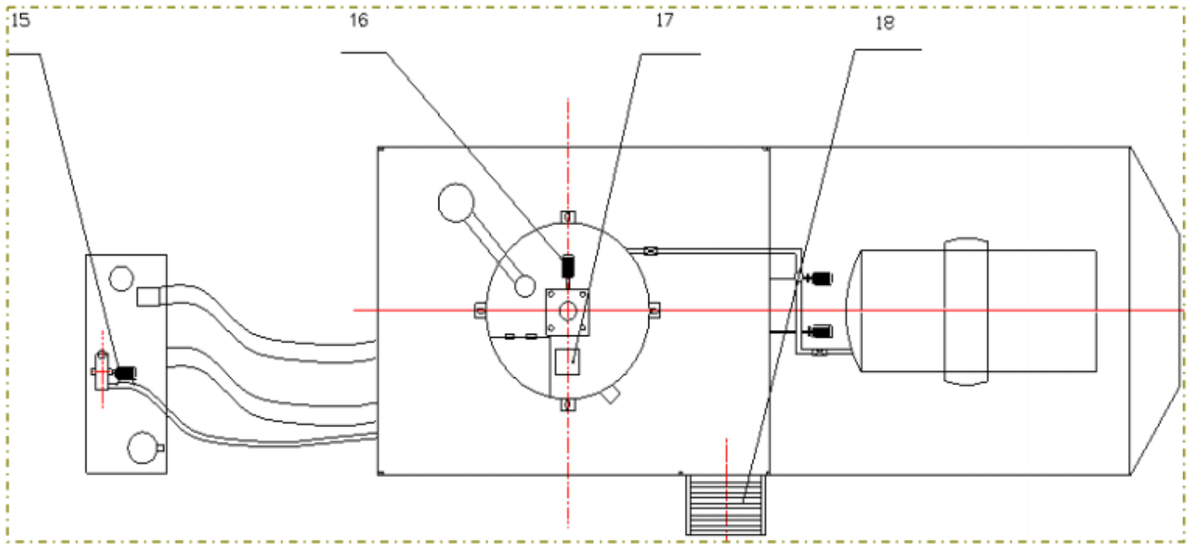
PROCESS FLOW MAP

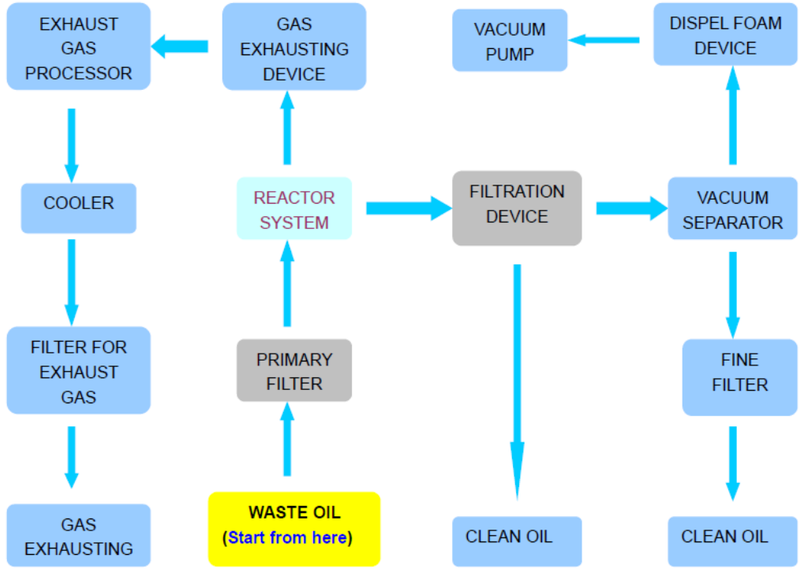




LYE-1000 FLOW CHART

1. Draught fan 2. Oil inlet 3. Oil Pump 4. Heater 5. Cooler 6. Fan
7. Reaction Tank 8. Distribution Box 9. Oil Pump 10. Fine Filter
11. Vacuum Pump 12. Primary Filter 13. Oil Pump 14. Filter Press
15. Motor 16. Motor 17. Feed Opening 18. Ladder





File Name/Path

REVISIONS:	
DATE:	
BY:	

GEOTECH ENVIRONMENTAL

CLIENT NAME:
U.S. LUBRICANTS, LLC
3636 NW 48 TERRACE
MIAMI, FL 33142

SITE ADDRESS:
U.S. LUBRICANTS, LLC
7855 WEST 2ND COURT, BAY 2
HIALEAH, FL 33012

SHEET TITLE:
PROCESS FLOW MAP

PROJECT NO.:	021503
DATE:	02-06-15
SHEET NO.:	FIGURE 6

LIST OF TABLES

TABLE 1

STORAGE TANK INFORMATION

TANK CAPACITY (GALLONS)	TANK MATERIAL	ABOVE GROUND UNDERGROUND	MATERIAL STORED IN TANK	TANK INSTALLATION
Tank # 1 295	STEEL	AG Double-walled	Used Oil	2014
Tank # 2 295	STEEL	AG Double-walled	New Processed Oil	2014
Tank # 3 300	STEEL	AG Single-walled	Used Oil for processing	2014

TABLE 2

SECONDARY CONTAINMENT CALCULATION FOR THE USED OIL PROCESSING OR REGENERATION AREA

Containment Basin:	***Actual***	***Increase***	***Total***			
Width	16		16	feet		
Length	22		22	feet		
Min. Depth	0.5		0.5	feet		
Area	352.0	sq. ft.				
Volume	176.0	cu. Ft.				
	1,316.5	**gallons**				
Volume of the Largest Tank & piping:	**400**	**gallons**				
Volume occupied by Equipment:	5.0%	% (estimate percentage - use 5% as default)				
	65.8	gallons				

TABLE 3

USED OIL NOT EXCEEDING ANY ALLOWABLE LEVEL SHOWN BELOW IS NOT SUBJECT TO THIS PART WHEN BURNED FOR ENERGY RECOVERY

(E-CFR 2/19/2015, TITLE 40 → CHAPTER I → SUBCHAPTER I → PART 279 → SUBPART B → §279.11)

Constituent/property	Allowable level
Arsenic	5 ppm maximum.
Cadmium	2 ppm maximum.
Chromium	10 ppm maximum.
Lead	100 ppm maximum.
Flash point	100 °F minimum.
Sulfur	0.4% maximum
Total Halogens	1,000 ppm maximum
PCB	2 ppm maximum
Maximum Halides	4,000 ppm maximum.

TABLE 4

SAMPLING PARAMETERS THAT MAY BE REQUIRED FOR THE OIL & SLUDGE ANALYSIS

CONSTITUENT	USEPA METHOD FOR OIL AND SLUDGE
Arsenic	200.7/6010B (ICP)
Cadmium	200.7/6010B (ICP)
Chromium	200.7/6010B (ICP)
Lead	200.7/6010B (ICP)
Flash point	1010A (ASTM D-93/96)
Sulfur	Modified ASTM D 2622 (or equivalent)
Total Halogens	8010B
PCB	8082
Maximum Halides	8010B
OTHER CONSTITUENTS (IF REQUIRED)	
Volatile Organic Compounds (VOCs) - BTEX	8260 B
Semi Volatile Organic Compounds – PAHs	8270C
Total Recoverable Petroleum Hydrocarbons (TRPH)	FL-PRO
8 RCRA Metals (As, Ba, Cd, Cr, Pb, Hg, Se, Ag)	6010B/7470A
TCLP/SPLP Package	40 CFR 261.24 (Table 1)
TCLP Arsenic	1311/7060
TCLP Barium	1311/7080
TCLP Cadmium	1311/7131
TCLP Chromium	1311/7191
TCLP Lead	1311/7421
TCLP Mercury	1311/7471
TCLP Selenium	1311/7740
TCLP Silver	1311/7761
TCLP Organics	1311/624 Refer to 40 CFR 261.24
TCLP Organics	1311/625 Refer to 40 CFR 261.24
TCLP Organics	1311/608 Refer to 40 CFR 261.24
TCLP Organics	1311/615 Refer to 40 CFR 261.24

Note: Disposal companies that will receive sludge from the LHE-1000 may also require additional analysis in addition to Table 3. USL will inquire with each disposal firm for proper analysis and acceptance procedures. Sludge will be analyzed for 8 RCRA metals and organic constituents in accordance with the Toxicity characteristic Leaching Procedure (TCLP). Additional testing for ignitability and corrosivity may be required. If process knowledge is available indicating the nature and/or physical characteristics of the waste, then the above mentioned analytical requirements may be reduced.

U.S. LUBRICANTS, LLC

7855 West 2nd Court, Bay 2, Hialeah, Florida 33012

TABLE 5. UNIFORM WASTE TRANSPORTERS MANIFEST

NO HAZARDOUS MIXTURES ACCEPTED - READ BOTTON OF MANIFEST

	Generator's Name and Mailing Address:		**PO#:**		**Manifest Document#**			
	Generator's Phone:		**County of Origin:**		**Generator's ID #s EPA**		**Generator's ID #s STATE**	
	Transporter 1 Company Name:	**U.S. Lubricant, LLC 3636 NW 48th Terrace, Miami, FL 33142**	**US EPA ID Number**		**State Transporters ID**		**Transporter's Phone**	
	Designated Facility Name and Site Address:						**Dade County ID:**	
							Facility's Phone:	

	Waste Shipping & Name Description HM	**Containers**	**Total Quantity**	**Unit Wt/Volume**	**Price**	**Charges**
GENERATOR						
	Additional Descriptions for Materials Listed Above			**Total Due**		

GENERATOR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately describe above by proper shipping name and classified, packed, marked, and labeled, and are all in respects in proper condition for transport by highway according to applicable international and national government regulations. I also confirm that the contents of this consignment contains no hazardous materials. (In the event that these products/material are found to be Hazardous, I accept the responsibility for its proper disposal under Federal and State Regulations, including any contamination caused though commingling).

Printed Type Name	**Signature**	**Month**	**Day**	**Year**

TRANSPORT	**Transporter 1 Acknowledgement of Receipt of Materials**			
	Printed Type Name	**Signature**	**Month**	**Day**	**Year**

FACILITY	**Facility Owner or Operator: Certification of Receipt of Waste Material covered by this Manifest**				
	Printed Type Name	**Signature**	**Month**	**Day**	**Year**

ANALYTICAL TEST DATA

SAMPLED BY:_____

FIELD CHLOR-D-TECT 1000 SCREENING ANALYSIS:

Halogen Levels: _____

Below 1000 ppm: _____

Above 1000 ppm: _____

DATE:_____

TIME:_____

SAMPLING POINT LOCATION:

_____

LABORATORY PARAMETER	**USEPA METHOD**	**LABORATORY PARAMETER**	**USEPA METHOD**
Water Content:		Viscosity	
PCB:		Pb	
Odor:		Cr	
Color:		Cd	
API:		As	
Combustion:		Cl	
Flashpoint:		Other	

Dear Generator: The following chemicals contain hazardous substance which when mixed with used oil reduces the recycling potential and can cause harmful effects to the environment.

DO NOT MIX WITH USED OIL

Antifreeze Freon - Solvents - Thinner - Degreasers - Detergents - Cleaners - Radiator Fluid - Leaded Gasoline - Cutting Oil.

CAN MIX USED OIL

Motor Oil - Diesel Fuel - Grease - Break Fluids - Hydraulic Fluid - Transmission Fluid

These lists are based on current information and may be expanded as more data becomes available, THANK YOU.

WHITE - Original YELLOW- Transporter PINK - Transporter GOLDENROD - Generator

TABLE 6

FDEP RECORD KEEPING FORM

TABLE 6

DEPARTMENT OF ENVIRONMENTAL PROTECTION
Mail Station 4560, 2600 Blair Stone Road, Tallahassee, Florida 32399-2400

DEP Form #62-710.901(2)
Form Title Used Oil and Used Oil Filter Record Keeping Form
Effective Date 4-23-13
Incorporated in Rule 62-710.510(1)

Used Oil and Used Oil Filter Record Keeping Form and Instructions

Rule 62-710.510 of the Florida Administrative Code requires each registered person to maintain records on either this or a substantially equivalent form which contains the same information. This information must be kept on-site for three (3) years and be available for inspection by DEP during normal business hours. Used oil filter information is optional (but recommended). The used oil from filter management must be recorded and reported.

A. Used Oil Source Name, Street Address, City, State, Zip Code, EPA ID Number, if applicable	B. Date	C. Number of Filters	D. Gallons of Used Oil	E. Type Code	F. End Use Code	G. Destination of Used Oil/Used Oil Filters Name, Street Address, City, State, Zip Code, EPA ID Number, if applicable	H. State Mark "X" if not Florida

I. TOTAL Collected

	Automotive	Industrial	Mixed
In State			
Out of State			

J. TOTAL Managed

End Use Code	N	O	F	I	B	D
In State						
Out of State						

Page 1 of 2

TABLE 6A
FDEP RECORD KEEPING FORM (continued)

DEP Form #62-710.900(2)
Form Title Used Oil and Used Oil Filter Record Keeping Forms
Effective Date 4-23-13
Incorporated in Rule 62-710.510(1)

Instructions for Completing the Used Oil and Used Oil Filter Record Keeping Form

Use this form to comply with the Used Oil Management Rule, Chapter 62-710.510, Florida Administrative Code.

Column A. Used Oil/Filter Source: Print the described information required for each location (including EPA ID number, if the location has one) where used oil, oily waste, and used oil filters (optional) are collected or the name and registration number of the transporter from whom such material is received. List only one source per line. If you are sending such materials off-site, then print the name of your business in this space.

Column B. Date: Fill in the date used oil (filters optional) is collected from source or shipped to a destination

Column C. (Optional) Number of Filters: Enter the number of filters handled by direct count, or from the following table:

One **55**-gallon drum of **crushed** used oil filters = approximately **400** used oil filters
One **55**-gallon drum of **uncrushed** used oil filters = approximately **250** used oil filters
One **ton** of drained used oil filters = approximately **2,350** used oil filters

Column D. Gallons of Used Oil: Enter the total number of gallons received from each used oil source or shipped to a destination in Column G.

Column E. Type Code: Enter the type code (from the table below) of the used oil.

Column F. End Use Code: Enter the end use code (from the table below) of the used oil.

Column G. Destination of Used Oil/Filters: Print the listed information for each location to which used oil/filters are delivered. If the used oil/waste/filters are stored, processed or end-used at your facility, then print your company information here.

Column H. State: Record whether the used oil/filters were picked up/delivered to a facility outside of Florida by marking the box. If the facility was located within Florida, leave this box empty.

Box I. Total Collected: Record the total number of gallons (from this page) collected, by type and source.

Box J. Total Managed: Record the total number of gallons (from this page) Managed, by type and source.

TYPE CODE
A - Automotive: Includes spent engine oil from cars, trucks, trains, boats, planes, farm equipment and other off-road automotive engines as well as such related automotive lubricants as transmission fluids, brake fluids, and gear lubricants. **I - Industrial:** Includes spent oils from industrial operations such as compressor turbine and bearing oils, hydraulic oils, metalworking oils, gear oils, electrical oils, refrigeration oils, tank bottoms, industrial process oils, and oil from ships. **M -Mixed:** means a mixture of industrial and automotive oils. This term should be used only when it is impossible to determine the type of oil when its source is considered

END USE CODE
N - Shipment transferred to another facility for storage or processing (not an end use). **O** - Marketed as an on-specification used oil fuel. **F** - Marketed as an off-specification used oil fuel. **I** - Marketed for an industrial process (includes processing into asphalt, use in phosphate mining beneficiation, processing lube base stocks by re-refining, and use a form or chain oil). **B** - Burned as an off-specification used oil fuel. **D** – Disposed of by being landfilled, treated at a wastewater treatment unit, or incinerated (includes disposal of bottom sediments, water, or other oily wastes).

Any questions concerning this form may be referred to the Used Oil Coordinator, MS 4555, Department of Environmental Protection, 2600 Blair Stone Road, Tallahassee, FL 32399-2400, Phone (850) 245-8707.

Page 2 of 2

TABLE 7

FACILITY EMERGENCY EQUIPMENT

Equipment	Quantity	Type	Capabilities
Communication System	2	Telephone	Call Emergency Responders/Numbers. Alert workers
Fire Alarm (A)	1	Horn	Warn in case of Fire
Fire Extinguisher	4	ABC (dry chemical)	Put out fire
Eye Wash Station (EW)	1	Water	Clean in case of emergency
Respirators ®	2	Full face with cartridges	Purify air
Spill Pads (S)	1 roll	Synthetic	Clean up spill
Spill Kits (S)	2 drums	Clay	Clean up spill
Empty Drums	2	1A1 Steel	Clean up spill, store material
Spill Pumps	1	Diaphragm	Pump up material
First Aid Kit	1	Industrial	Provide First AID
Pressure Washer (P)	1	2,500 psi	Clean up area/spill

Refer to **Figure 5,** for the location of the above referenced equipment.

TABLE 8

WEEKLY & MONTHLY INSPECTION CHECKLIST FORM

Equipment Identification	Date		Condition								Notes
	Weekly	Monthly	Leaks		Corrosion		Wear		Other		
			Y	N	Y	N	Y	N	Y	N	
Aboveground Storage Tanks											
Tank 1 (double-walled)											
Tank 2 (double-walled)											
Tank 3 (Single walled)											
Equipment											
LYE Equipment											
Process Piping											
Valves											
Secondary Containment											
Safety Equipment: Fire extinguishers, First Aid Kit, etc											
Drums											

Notes:
Place a check mark in the appropriate column to indicate a yes/no response. Corrective actions should be described in the Notes column.

Name: _____

Signature:_____

TABLE 9
EMERGENCY CONTACT LIST

Local Authority / Agency	Phone Numbers	Contact Period
Miami Dade Police Department 9105 NW 25 St. Doral, FL 33172 Phone: 305-4-POLICE (Non-Emergencies)	911 305 476 5423	Immediately
Miami Dade Office of Emergency Management 9300 NW 41st St, Doral, FL 33178	911 305 468 5400	Immediately
Miami Dade Fire Department Department of Fire-Rescue 1151 NW 7th St. Miami, Florida 33136	(305) 416-5400	Immediately
Emergency Medical Service	911	As Needed
Miami Dade Department of Regulatory & Economic Resources (DERM) 33 SW 2nd Ave, Miami, FL 33130	(305) 372-6789	Within 24 hours
Florida Department of Environmental Protection – Southeast District Office 3301 Gun Club Rd, West Palm Beach, FL 33406	*Normal Business Hours: (561) 681-6600	Within 24 hours
Florida Department of Environmental Protection Bob Martinez Center 2600 Blair Stone Tallahassee, Florida, 32399-2400	Normal Business Hours Office:(850) 245-8707 24 hour Emergency Number: (850) 413-9911 FDEP State Watch Office: (800) 320-0519	Within 24 hours
Florida Division of Emergency Management (aka Florida State Warning Point) 2555 Shumard Oak Boulevard Tallahassee, Florida 32399-2100	FDEP State Watch Office: (800) 320-0519	Within 24 hours
U.S. EPA Office of Emergency Management Ariel Rios Building (5104A) 1200 Pennsylvania Avenue, NW Washington, DC 20460	(404) 562-8700	As Needed
Palmetto General Hospital (Primary) 2001 W 68th St, Hialeah, FL 33016	305 823 5000	As Needed
EPA Emergency Hotline	404 562 8700	As Needed
Primary Emergency Coordinator Jose L. Fernandez Manager/USL Address: 748 East 51 Street, Hialeah, Florida 33013	Office - (305) 477 7338 Cell - 786 229 0144 Email: joseF@US-lubes.com	Immediately
Alternate Emergency Coordinator Howard Sanchez, USL Address: 7855 West 2nd Ct, #2, Hialeah, Florida 33012	786 459 7335	Immediately
Emergency Planning Council	954 985 4416	As Needed
Hazardous Materials Clean-up Contractor: Cliff Berry Inc., 851 Eller Drive P.O. Box 13079 Port Everglades, FL 33316	(954) 763-3390	As Needed

Notes: *USL has instructed their personnel which numbers to call in case of emergencies.

TABLE 10

CLOSURE COST ESTIMATE SUMMARY & LIST OF ACTIVITIES

Florida Department of Environmental Protection

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

DEP Form #62-710.901(7)
Form Title Used Oil Processing Facility Closing Cost Estimate Form
Effective Date 4-23-13
Incorporated in Rule 62-710.800(6)(b)

Used Oil Processing Facility Closing Cost Estimate Form

Date: 3/20/2015 Date of DEP Approval: _____ (DEP use only)

I. GENERAL INFORMATION: Latitude: 25° 53' 38.77" N Longitude: 80° 17' 18.98" W EPA ID Number: FLR 000 213 777

Facility Name: U.S. LUBRICANTS, LLC Permit Number: _____

Facility Address: 7855 WEST 2ND COURT, BAY 2, HIALEAH, FL 33012

Mailing Address: P.O. BOX 523212, MIAMI, FLORIDA 33152

Contact Person's Name: JOSE L. FERNANDEZ Phone Number: 305 477 7338

E-mail: JOSEF@US-LUBES.COM Fax Number: NA

II. TYPE OF FINANCIAL ASSURANCE DOCUMENT (Check Type)

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

*Indicate mechanisms that require use of a Standby Trust Fund Agreement

____ Insurance Certificate ____ Financial Test ____ Trust Fund Agreement

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

Rule 62-710.800(6)(c), Florida Administrative Code, sets forth the method of annual cost estimate adjustment. Cost estimates may be adjusted by using an inflation factor or by recalculating the maximum costs of closing in current dollars. Estimates are due annually between January 1 and March 1. Select one of the methods of cost estimate adjustment below.

☐ **(a) Inflation Factor Adjustment**

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

This adjustment is based on the Department approved closing cost estimate dated: _____

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

Signature: _____ Phone: 305 477 7338

Name and Title: JOSE L. FERNANDEZ, MANAGER E-mail: JOSEF@US-LUBES.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
Florida Department of Environmental Protection
2600 Blair Stone Road MS 4560
Tallahassee, FL 32399-2400

Please e-mail or mail a copy of the cost estimate to:

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

☒ (b) Recalculated Cost Estimates (complete items IV and V) SEE TABLE 10

IV. RECALCULATIONS OF CLOSING COSTS

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

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

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

TABLE 10. CLOSURE COST ESTIMATE SUMMARY & LIST OF ACTIVITIES FOR THE U.S. LUBRICANTS, LLC USED OIL PROCESSING FACILITY CLOSURE PLAN				
DESCRIPTION/ACTIVITY	**QUANTITY**	**UNIT**	**UNIT COST ($)**	**TOTAL COST ($)**
Task 1 - LYE-1000 Regeneration Equipment & Tanks Closure				
Contractor Services	900	GAL.	$0.30	$270.00
Cleaning & Decontamination of the tanks, piping, LYE 1000	750	GAL.	$1.80	$1,350.00
Equipment, and Secondary Containment(s)				
Waste charaterization	4	EA.	$350.00	$1,400.00
Sludge disposal	55	GAL.	$1.80	$99.00
Transportation to CBI or Triumvirate	100	MILE	$0.75	$75.00
Disposal of LYE-1000 equipment	1	EA.	$2,500.00	$2,500.00
Consulting Services	40	HR.	$95.00	$3,800.00
Construction Monitoring	40	HR.	$95.00	$3,800.00
Equipment costs	1	LS	$1,000.00	$1,000.00
Misc. Direct costs	1	LS	$500.00	$500.00
Subtotal cost ($)				$14,794.00
Task 2 - LYE-1000 Secondary Containment Area & Concrete Floor Closure				
Cleaning & decontamination of LYE-1000 sec. containment area & concrete floor	1000	GAL.	$0.30	$300.00
Labor	36	HR.	$75.00	$2,700.00
Consulting Services				
Construction Monitoring	24	HR.	$95.00	$2,280.00
Equipment Costs	3	DAY	$200.00	$600.00
Misc. Direct Costs	1	LS	$500.00	$500.00
Subtotal cost ($)				$6,380.00
Task 3 - Soil Investigation				
Consulting Services				
Construction Monitoring	20	HR.	$95.00	$1,900.00
Concrete coring (Driller)	4	EA.	$180.00	$720.00
Driller Mobilization	1	EA.	$1,000.00	$1,000.00
Equipment Costs	3	DAY	$200.00	$600.00
Misc. Direct Costs	1	LS	$500.00	$500.00
Subtotal cost ($)				$4,720.00

TABLE 10. CLOSURE COST ESTIMATE SUMMARY & LIST OF ACTIVITIES FOR THE U.S. LUBRICANTS, LLC USED OIL PROCESSING FACILITY CLOSURE PLAN (cont)				
DESCRIPTION/ACTIVITY	**QUANTITY**	**UNIT**	**UNIT COST ($)**	**TOTAL COST ($)**
Task 4 - Groundwater Investigation				
Consulting Services				
Construction Monitoring	25	HR.	$95.00	$2,375.00
Installation of four shallow monitoring wells (Driller)	4	EA.	$675.00	$2,700.00
Driller Mobilization	1	EA.	$1,500.00	$1,500.00
Equipment Costs	3	DAY	$200.00	$600.00
Misc. Direct Costs	1	LS	$500.00	$500.00
Subtotal cost ($)				$7,675.00
Task 5 - Analytical				
Final Rinsate Blanks (tanks, piping, equip, concrete floor)				
Used Oil Group Analysis - 62-780, FAC	8	EA.	$550.00	$4,400.00
8 RCRA Metals	8	EA.	$160.00	$1,280.00
Sludge Analysis				
TCLP Organics	8	EA.	$225.00	$1,800.00
TCLP Metals	6	EA.	$116.00	$696.00
Soil Analysis				
Used Oil Group Analysis - 62-780, FAC	8	EA.	$550.00	$4,400.00
8 RCRA Metals	8	EA.	$160.00	$1,280.00
Total Halogens	8	EA.	$60.00	$480.00
Subtotal cost ($)				$14,336.00
Task 6 - Data Evaluation, Certification & Closure Report				
Professional Engineer, P.E.,	4	EA.	$150.00	$600.00
Professional Geologist, P.G.,	12	EA.	$115.00	$1,380.00
Project Manager	16	EA.	$95.00	$1,520.00
Draftsman/Cadd	8	EA.	$75.00	$600.00
Field Technician/Sampler	36	EA.	$70.00	$2,520.00
Editor	5	EA.	$65.00	$325.00
Admin/Clerical	8	EA.	$45.00	$360.00
Misc. Direct Costs	1	EA.	$1,000.00	$1,000.00
Subtotal cost ($)				$8,305.00
SUBTOTAL CLOSING COSTS (Task 1 thru 6)				$97,626.00
Contingency (10%)				$9,762.60
TOTAL CLOSING COSTS (Task 1 thru 6)				**$107,388.60**
Notes:				
Engineering (On-site inspections and QA are included in the estimate above)				

ATTACHMENT A

A: USED OIL PROCESSING FACILITY PERMIT APPLICATION

USED OIL PROCESSING FACILITY PERMIT APPLICATION

Part I

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

A. General Information

1. New x Renewal _____ Modification _____ **Date current permit expires** _____

2. Revision number _____

3. NOTE: Used Oil Processors must also meet all applicable subparts, **(describe compliance in process description for applicable standards)** if they are:
   - _____ Generators (Subpart C of Part 279)
   - x Transporters (Subpart E)
   - _____ Burners of off-spec used oil (Subpart G)
   - x Marketers (Subpart H)
   - _____ are disposing of used oil (Subpart I)

4. Date current operation began: NOT IN OPERATION, AWAITING DEPARTMENT APPROVAL

5. Facility name: U.S. LUBRICANTS, LLC

6. EPA identification number: FLR 000 213 777

8. Facility mailing address:

7855 WEST 2 COURT, BAY 2	HIALEAH	FL	33012
Street or P.O. Box	City	State	Zip Code

9. Contact person: JOSE L. FERNANDEZ Telephone: (305) 477 7338

Title: MANAGER Email joseF@us-lubes.com

Mailing Address:

P.O. BOX 523212	MIAMI	FL	33152
Street or P.O. Box	City	State	Zip Code

10. Operator's name: JOSE L. FERNANDEZ Telephone: (305) 477 7338

Mailing Address:

P.O. BOX 523212	MIAMI	FL	33152
Street or P.O. Box	City	State	Zip Code

11. Facility owner's name: JOSE L. FERNANDEZ Telephone: (305) 477 7338

Mailing Address:

P.O. BOX 523212	MIAMI	FL	33152
Street or P.O. Box	City	State	Zip Code

12. Legal structure:
   - _____ Corporation (indicate state of incorporation) _____
   - X 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 MIAMI DADE State FLORIDA

Name: JOSE L. FERNANDEZ
Mailing Address:
P.O. BOX 523212 | MIAMI | FL | 33152
Street or P.O. Box | City | State | Zip Code

Name:
Mailing Address:
Street or P.O. Box | City | State | Zip Code

Name:
Mailing Address:
Street or P.O. Box | City | State | Zip Code

Name:
Mailing Address:
Street or P.O. Box | City | State | Zip Code

13. Site ownership status: [ ] owned [ ] to be purchased [ ] to be leased 2 years
[X] presently leased; the expiration date of the lease is: JUNE 2016

If leased, indicate: Land owner's name: COMMERCIAL MGMT GROUP LLC
Mailing Address:
7901 W 25 AVENUE BAY 3 & 4 | HIALEAH | FL | 33012
Street or P.O. Box | City | State | Zip Code

14. Name of professional engineer IRVING E. ABCUG Registration No. 28376
Mailing Address:
7737. N. UNIVERSITY DRIVE, STE 206 | TAMARAC | FL | 33321
Street or P.O. Box | City | State | Zip Code
Associated with: GEOTECH ENVIRONMENTAL, INC

B. SITE INFORMATION

1. Facility location:
County: MIAMI DADE
Nearest community: MIAMI
Latitude: 25° 53' 38.77" N Longitude: 80° 17' 18.98" W
Section: 30 Township: 52 Range: 41 EAST
UTM # 571252.99 / 2864150.33 / 17R /

2. Facility size (area in acres): 0.03 ACRES

3. Attach a topographic map of the facility area and a scale drawing and photographs of the facility showing the location of all past, present and future material and waste receiving, storage and processing areas, including size and location of tanks, containers, pipelines and equipment. Also show incoming and outgoing material and waste traffic pattern including estimated volume and controls. (see Figure 1 & 2)

The facility's detailed process description is labeled as Attachment D

C. OPERATING INFORMATION

* 1 - Conditionally Exempt Small Quantity Generators (CESQG) generate 100 kilograms or less per month of hazardous waste, or 1 kilogram or less per month of acutely hazardous waste. Requirements for CESQGs include (see also 40 CFR 261.5):

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

2. List applicable EPA hazardous waste codes:

D001, D004, D005, D006, D007, D008, D018, D021, D022, D039, D040

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

A brief description of the facility operation is labeled as Attachment C

4. 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 four (4), page four (4) of the instructions.]

The facility's detailed process description is labeled as Attachment B

5. The following parts of the facility's operating plan should be included as attachments to the permit application. [See item five (5), page four (4) of the instructions.]

   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 G

   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 G

   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 H

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 six (6), page five (5) of the instructions.]

The preparedness and prevention plan is labeled as Attachment I

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 seven (7), page five (5) of the instructions.]

The contingency plan is labeled as Attachment J

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 _____

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 nine (9), page six (6) of the instructions.]

The closure plan is labeled as Attachment N

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

A description of employee training is labeled as Attachment F

APPLICATION FORM FOR A USED OIL PROCESSING PERMIT

PART II - CERTIFICATION

TO BE COMPLETED BY ALL APPLICANTS

Form 62-710.901(6) Operator Certification

Facility Name: U.S. LUBRICANTS, LLC EPA ID# FLR 000213777

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 62701 and 62-710, F.A.C., and all rules and regulations of the Department of Environmental Protection

Signature of the Operator or Authorized Representative*

JOSE L. FERNANDEZ, MANAGER

Name and Title (Please type or print)

Date: 2/23/15 Telephone: (305) 477 7338

* If authorized representative, attach letter of authorization.

APPLICATION FROM FOR A USED OIL PROCESSING PERMIT

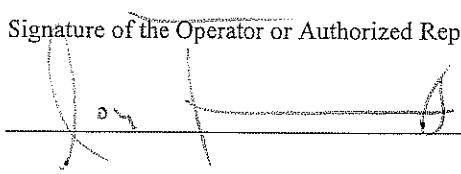
PART II - CERTIFICATION

Form 62-710.901(6) Facility Owner Certification

Facility Name: U.S. LUBRICANTS, LLC EPA ID# FLR 000213777

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 Operator or Authorized Representative*



JOSE L. FERNANDEZ, MANAGER

Name and Title (Please type or print)

Date: 2/23/15 Telephone: (305) 477-7338

* If authorized representative, attach letter of authorization.

APPLICATION FROM FOR A USED OIL PROCESSING PERMIT

PART II - CERTIFICATION

Form 62-710.901(6) Land Owner Certification

Facility Name: U.S. LUBRICANTS, LLC EPA ID# FLR 000213777

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 Operator or Authorized Representative*

*2

RICHARD RAFELS, MG MEMBER

Name and Title (Please type or print)

Date: 2/23/15 Telephone: (305) 383 8881

* If authorized representative, attach letter of authorization.

*2. The Land Owners signature page is missing, which will be provided by U.S. Lubricants, LLC as a separate cover to the Department.

APPLICATION FORM FOR A USED OIL PROCESSING PERMIT

PART II - CERTIFICATION

Form 62-710.901(6) 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

X _____ Initial Certification _____ Recertification

1. DEP Facility ID Number: FLR 000213777 2. Tank Numbers: 3

3. Facility Name: U.S LUBRICANTS, LLC

4. Facility Address: 7855 WEST 2ND COURT, HIALEAH, FL 33012

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

IRVING E. ABCUG, P.E
Name (please type)

Florida Registration Number: 28376

Mailing Address: 7737 N. UNIVERSITY DR, STE 206
Street or P. O. Box

TAMARAC	FL	33321
City	State	Zip

Date: 2/23/15 Telephone ( ) 954 597 9100

[PLEASE AFFIX SEAL]

ATTACHMENT B

PROCESS FLOW

B: DESCRIPTION OF PROCESS FLOW

B1 General

Upon Department approval, U.S. Lubricants, LLC, (USL) is planning to operate a used oil processing facility at 7855 West 2nd Court, Bay 2, Hialeah, Florida 33012 (see **Figure 1** for the Site Topographic Map and **Figure 2** for the Site Layout Map included in the List of Figures. The facility entrance is shown in **Photos 1** and **2**. The goal of the processing is aimed at making regenerated used oil offered for purchase more amenable for distribution back into the market. As a used oil processor, transporter, and marketer, USL is subject to all Federal, in particular the 40 CFR Part 279 - Standards for the Management of Used Oil, State, and local regulations governing used oil management.

Currently, USL is a licensed liquid waste transporter (#00823- expires 3/2015) with the Miami Dade County Department of Environmental Resources Management (DERM) to transport used oil, waste water, and non-hazardous waste at the 3636 NW 48th Terrace, Miami, Florida 33142 facility (hence also known as Miami Facility). USL has a registered EPA FLR I.D. 000 213 777 and is designated as a Conditionally Exempt Small Quantity Generator (CESQG) that generates in any calendar month 100 kg/mo or less (220 lbs.) of non-acute hazardous waste and 1 kg (2.2 lbs.) or less of acute hazardous waste. At the Miami facility, USL accepts all used oil, coolants, oil filters, industrial non-hazardous waste, oily wastewater, petroleum contact water, and non-hazardous investigative derived wastewater.

At the Hialeah facility, USL will only accept used oil[2]. Refer to **Figure 3** for the Facility Process Flow Diagram included in the List of Figures. Description of how used oil will be managed at the facility is discussed below by task or activity. Process flow will include waste stream designation, characterization, storage and processing from incoming material to shipment departure.

B1 Waste Stream Designation (Used Oil)

Types of clients that USL will serve will include business that service motor vehicles. Prior to scheduling a load of used oil to be received, USL will determine the proper designation of the waste stream generated by the Client as follows:

USL will develop a signed and completed Uniform Waste Transporters Manifest (**Table 5**), any applicable Safety Data Sheets (SDS), laboratory approval number(s), and any associated analytical data for the material to be collected. An example of a waste stream laboratory approval number is show below. Each of the alpha/numeric fields has a tracking significance.

HC101-1052-UA-022315-01 (Manifest/Approval Number)

i. The first section of the waste stream laboratory approval number contains the USL customer code. For example, Hialeah Containers = HC101
ii. The second section of the approval number contains the waste profile form number, which is either preprinted on the USL waste profile forms or is assigned by the laboratory. The waste stream approvals are to be filed according to the waste profile number in the USL laboratory or designated analytical testing laboratory.

[2] The term "used oil" means any oil refined from crude oil or synthetic oil, that: (A) has been used and as a result of such use is contaminated by physical or chemical impurities; or (B) is no longer suitable for the services for which it was manufactured due to the presence of impurities or a loss of original properties. This includes both used and unused oils that are being discarded.

iii. The third section of the approval number is the generic waste stream classification as defined below. The generic waste stream classification uses a two-letter classification system.

   a. U = USED OIL
   b. UA = AUTOMOTIVE USED OIL

iv. The fourth approval number section contains the waste stream approval date. The waste stream approvals are good for a period of one year. The waste stream approval numbers are to be placed on the incoming USL shipment bill of lading or nonhazardous waste manifest. The USL Operator can tell at a glance by checking the approval date and comparing it to the shipment date if the waste stream approval is currently valid.

v. The fifth approval number section contains the sequential number of waste streams approved on a given date at USL. The waste stream approvals will be filed sequentially by the approval date in the office area.

B3 Acceptance Information

In accordance to 40 CFR 279.56, USL will keep a record of each used oil shipment accepted for processing. These records such as the manifest discussed above. Records for each shipment will include at a minimum the following acceptance and delivery information:

1. The name and address of the transporter who delivered the used oil to the processor/re-refiner.
2. The name and address of the generator or processor/re-refiner from whom the used oil was sent for processing/re-refining.
3. The EPA identification number of the transporter who delivered the used oil to the processor/re-refiner.
4. The EPA identification number (if applicable) of the generator or processor/re-refiner from whom the used oil was sent for processing/re-refining.
5. The quantity of used oil accepted; and the date of acceptance.

B4 Delivery Information

USL will keep a record of each shipment of used oil that is shipped offsite. These records may take the form of a log, invoice, manifest, bill of lading or other shipping documents. Records for each shipment must include the following information:

1. The name and address of the transporter who delivers the used oil to the burner, processor/re-refiner or disposal facility.
2. The name and address of the burner, processor/re-refiner or disposal facility who will receive the used oil.
3. The EPA identification number of the transporter who delivers the used oil to the burner, processor/re-refiner or disposal facility.
4. The EPA identification number of the burner, processor/re-refiner, or disposal facility who will receive the used oil
5. The quantity of used oil shipped; and the date of shipment.

The records described above will be maintained for at least three years.

B5 Waste Characterization

Verification analysis will be performed prior to and following each treatment process. All incoming material will be sampled according to current USL company procedures to determine oil quality. Upon completion of the documentation discussed above, USL trained pump truck operator will collect one sample from each batch of used oil at the Client's facility and test for the halogen content in the field. To ensure that used oil managed at the processing facility is not hazardous waste under the rebuttable presumption of § 279.10(b)(1)(ii), USL will determine whether the total halogen content of used oil is above or below 1,000 parts per million (ppm).

The operator will make this determination by (1) Testing the used oil; or (2) by applying knowledge of the halogen content of the used oil in light of the materials or processes used. If the used oil contains greater than or equal to 1,000 ppm total halogens, it is presumed to be a hazardous waste because it has been mixed with halogenated hazardous waste listed in subpart D of part 261 of 40 CFR. Total halogens testing may be conducted either by a TIP Instruments Halogen Detector and/or Dexsil Halogen Test Kit. It should be noted that USL may rebut[3] the presumption by demonstrating that the used oil does not contain hazardous waste (for example, by showing that the used oil does not contain significant concentrations of halogenated hazardous constituents listed in appendix VIII of part 261 of 40 CFR).

B6 Transportation

All used oil accepted by USL vehicles will be delivered to the USL facility for processing using the one 2800-gallon pump truck currently owned by the firm. USL will comply with all USDOT regulations as described in 40 CFR, which are applicable to USL standard operation(s). Each USL vehicle utilized for transporting used oil will contain a Spill Contingency Plan, cellular/two-way radiophone, fire extinguisher and Spill Containment Kit. All drivers will be trained as per the SPCC Plan and in accordance to the 40 CFR Part 112. If a spill occurs, USL will take immediate action as described within the SPCC Plan and as required under 40 CFR Part 279.43 (2 through 5).

B7 Unloading and Loading Station

The loading and unloading areas are located inside the warehouse building as shown in **Figure 2** for liquid wastes that arrive in the pump truck. The product transfer will occur inside the building as shown in **Photos 2** and **3**. The interior floor of the entire warehouse building consists of six (6) inch reinforced concrete slab structure and has been sealed using epoxy sealant and the entrance area bermed to contain potential spill overflowing outside the building.

B8 Storage Tanks

In accordance to Rule 62-762, Florida Administrative Code (F.A.C), the ASTs double-walled shop-fabricated tanks (in this case Modern Welding Tank) approved in accordance with subsection 62-762.851(2), F.A.C., do not have to be installed in a dike field area (see Photos **12**, **13**, & **14**) but are for added containment. Used oil from the tanker trucks will be transferred via 4-inch flex hoses directly into the one 295-gallon Used Oil double-walled aboveground storage tank (AST) located centrally inside the warehouse building and in an enclosed area (See **Figure 2**, Site Layout Map and **Photos 3 & 12**). The top of the ASTs consist of a 7.5-gallon spill buckets for

[3] (1) The rebuttable presumption does not apply to metalworking oils/fluids containing chlorinated paraffins, if they are processed, through a tolling agreement, to reclaim metalworking oils/fluids. The presumption does apply to metalworking oils/fluids if such oils/fluids are recycled in any other manner, or disposed. (2) The rebuttable presumption does not apply to used oils contaminated with chlorofluorocarbons (CFCs) removed from refrigeration units where the CFCs are destined for reclamation. The rebuttable presumption does apply to used oils contaminated with CFCs that have been mixed with used oil from sources other than refrigeration units.

collection of possible spills (**Photo 14**). The same process of loading will occur for the new regenerated oil developed from the LYE-1000 Engine Oil Recycling System.

All tanks implemented for used oil storage within the USL facility meet the requirements of 40 CFR Parts 264 and 265, as applicable. All secondary containment meet the requirements of 40 CFR Part 279.45. All tanks and/or containers utilized for used oil storage are labeled accordingly. USL will address any spill, leak or other discharge as described within the Spill Prevention, Control and Countermeasure (SPCC) Plan.

B9 Used Oil Processing/Regeneration

LYE-1000 used engine oil regeneration system is located to the northwest corner of the building. The system is approximately, 18.5 feet long by 6 feet wide by 10 feet high and is mobile (on wheels) as shown in **Figures 2** and **4**. (Refer to **Photos 3** thru **11** in Attachment **D**). Chongqing Zhongneng Oil Purifier Manufacture Co., Ltd is the manufacturer of the engine oil regeneration system. The system is designed to remove impurities, water, organic and inorganics, and including carbon particulate matter. Wastewater present in the used oil is evaporated during the regeneration process. LYE-1000 consists of the following components as shown in **Figure 6**:

1. Reaction system (reactor, blender, oil pump)
2. Heating system (heater, circulation oil pump, heat exchanger)
3. Filtering system (filtering equipment, strainer / filter plate).
4. Gas exhaust processing system (gas exhausting machine, radiator, cooler, water container, exhaust gas processor, exhaust gas filtration, fan)
5. Electrical control system (Motors, Electrical control cabinet, cables/ wires)

The process flow diagram of how the used oil is regenerated into new oil is shown in **Figure 6**. Waste oil is pumped into primary filter via the 4-inch flex pipe from the 295-gallon waste oil AST to remove big size particles, then it goes into the reaction system through oil pump, where certain amounts of flocculants and de-coloring additives are added manually by the USL technician. The oil is then mixed and heated causing the electric-charged particulates enlarge under the effect of phase separation (coacervation) by physical, chemical, and sorption effects. Harmful gas is removed via the exhausting system and residual water evaporated. The oil is now passed through the effect of degassing, dewatering, cooling, and finally filtering to remove tiny impurities resulting into clean oil pumped out by oil outlet pump to the 295-gallon double-walled new oil AST. The entire batch treatment process takes approximately, eight (8) hours based on use of 300-gallons of used oil. USL plans to operate the system based on maximum rate of one batch per day, or as needed. All outbound oil will be analyzed by certified laboratory to determine the quality of the new oil after treatment.

B10 Byproduct Management

Minimal amount of sludge (+/-1 pound/batch) is generated from the treatment of 300-gallon of used oil, which is removed via a filtration device and discharged into a separate holding tray. The sludge from the filter tray is manually placed into the 55-gallon drums located in the Waste Material Storage Area as shown in **Figure 2** and **Photos 5** and **15**. The waste sludge drums will be profiled, characterized for disposal parameters required by recycling facilities.

B11 Facility Standards

USL will maintain an internal communications system consisting of telephones, pagers, cellular phones, audible alarms and electrical alarms. Fire extinguishers (portable type) are located within the control booth and at each exit/entrance and every 50 linear feet. All facility equipment is tested and/or inspected regularly. Copies of inspection/testing documentation are provided in the SPCC Plan. Housekeeping is implemented as required by USL personnel to ensure adequate aisle space for the unobstructed movement of spill personnel and equipment. All local authorities have received a copy of USL's SPCC Plan. USL will clean close the facility as per 40 CFR Part 265 Subparts G and J.

U.S. LUBRICANTS, LLC – OWNER/OPERATOR APPROVAL

U.L. Lubricants. LLC is committed to the abiding by the Used Oil Processing Permit Application and all applicable regulatory standards for the facility located at 7855 West 2nd Court, Bay 2, Hialeah, Florida 33012. By signing below, I Jose L. Fernandez, Owner/Operator/Manager acknowledge that I have agree, have read, and understood with the above statements discussed in the Process Flow included in Attachment B.

U.S. Lubricants, LLC

_____

Name: Jose L. Fernandez, Owner/Operator/Manager

Signature Date: _____

B11 Facility Standards

USL will maintain an internal communications system consisting of telephones, pagers, cellular phones, audible alarms and electrical alarms. Fire extinguishers (portable type) are located within the control booth and at each exit/entrance and every 50 linear feet. All facility equipment is tested and/or inspected regularly. Copies of inspection/testing documentation are provided in the SPCC Plan. Housekeeping is implemented as required by USL personnel to ensure adequate aisle space for the unobstructed movement of spill personnel and equipment. All local authorities have received a copy of USL's SPCC Plan. USL will clean close the facility as per 40 CFR Part 265 Subparts G and J.

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U.S. Lubricants, LLC

Name: Jose L. Fernandez, Owner/Operator/Manager

Signature Date: 03/30/15

ATTACHMENT C

DESCRIPTION OF FACILITY OPERATIONS

C: DESCRIPTION OF FACILITY OPERATIONS

This portion of the application shall serve as an overview of facility process and the general intentions of U.S. Lubricants, LLC (USL) to process used oil to on-specification oil at the 7855 West 2nd Court, Hialeah, Florida facility for specific vendors.

C1Miami Facility

USL is licensed as a used oil collector, transporter, and recycler at their main facility located at 3636 NW 48 terrace, Miami, Florida 33142. The facility has been in business for three years. Currently, USL is a licensed liquid waste transporter with the Miami Dade County DERM and the Department to receive automotive and industrial used oil, oily wastewater, used oil filters, oily rags/absorbents, and automotive coolants:

* Industrial Waste 5 Annual Operating Permit (IW5 – 019743-2014-2015)

The Miami facility has one office and warehouse building that consists of a 3,000 gallon AST containing used oil not in service, a and drum storage area (inside the warehouse). The nature of the USL business is to (1) receive, store, and transport used oil to a specific client, H&J Asphalt. Waste oil is currently received from auto shops and auto dealerships. Waste oil that's too contaminated to meet U.S. Environmental Protection Agency (EPA) guidelines for recycling is not received at their facility. USL employs approximately, four (4) people at the facility and does expect to increase the number of employees after the used oil processing begins. Existing employees will be properly trained in the various procedures that will take place during the used oil processing.

C2 Hialeah Facility

Upon Department approval, USL will operate a used oil processing facility at 7855 West 2nd Court, Bay 2, Hialeah, Florida 33012. The goal of processing is to regenerate used oil offered for purchase and make it more amenable for distribution back into the market. USL has a registered EPA FLR I.D. 000 213 777 and is designated as a Conditionally Exempt Small Quantity Generator (CESQG) that generates in any calendar month 100 kg/mo or less (220 lbs.) of non-acute hazardous waste and 1 kg (2.2 lbs.) or less of acute hazardous waste.

At the Hialeah facility, USL will only accept used oil[4]. Refer to **Figure 2** for the Site Plan and Site Photos in **Attachment E**. The activities that USL intends to conduct include used oil storage, used oil processing, used oil treatment, and used oil marketing. USL used oil storage including the +/-300-gallon LYE-1000 regeneration system, two 295-gallon ASTs (Tank 1 & 2), stored inside the +/- 1384 square feet and 20 feet high enclosed warehouse building will not exceed +/- 900-gallons total oil. Used oil will be stored in Tank 1 and inside secondary containment.

[4] The term "used oil" means any oil refined from crude oil or synthetic oil, that: (A) has been used and as a result of such use is contaminated by physical or chemical impurities; or (B) is no longer suitable for the services for which it was manufactured due to the presence of impurities or a loss of original properties. This includes both used and unused oils that are being discarded.

C3 Facility Operations

All loading and unloading of oil will take place centrally within the warehouse building and on the 6-inch thick concrete slab located throughout the warehouse facility. Refer to **Attachment B** for a detailed description of the proposed process flow.

C4 LYE-1000 Oil Regeneration System

The LYE-1000 is a mobile processor that encompasses approximately, 18.5 feet long by 6 feet wide by 10 feet high situated to the west of warehouse building and within a secondary containment berm and sealed concrete floor area. The entire system area is in-doors, walled on all sides, and with one overhang roll-off door to the north and a small exit door to the south. The existing floor is constructed of six (6) inch thick reinforced concrete. The secondary containment around the LYE-1000 and the two ASTs consists of 8 gauge stainless steel welded plates encompassing an area of approximately, 22 feet long by 16 feet wide by 6-inces high, and the interior walls and floor of the containment is sealed with oil compatible epoxy sealer. Further the existing concrete slab area is also sealed with an epoxy sealer and the roll off door bermed to prevent an accidental discharge outside the building. The roof cover is reinforced beam.

C5 Tank Farm Storage Area

Situated near the center of the warehouse building are the two 295-gallon shop fabricated double-walled aboveground storage tanks (ASTs; Tank 1 & 2). These ASTs were installed by USL upon approval from the Miami Dade County DERM and Building Department for the use discussed above. Double-walled ASTs are approved in accordance with subsection 62-762.851(2), F.A.C., do not have to be installed in a dike field area but are as discussed above for added safety.

C6 New Chemical Storage and Sludge Area

The chemical storage area is located along the southern wall section of the warehouse and two or three 55-gallon drums containing sodium silicate and tetraethylenepentamine will be placed on spill containment pallets. One 55-gallon drum will also be placed on a spill containment pallet for storage of sludge recovered from the LYE-1000 system. Volclay 50-lb bags will be placed on top of the LYE-1000. Refer to the MSDS for the used oil, sodium silicate, tetraethylenepentamine, and volclay in **Attachment M**.

C7 Human Resources

The USL anticipates employing approximately, 4 staff members. The variability in the work force is dependent on business growth and will be most likely change in 2015. The types of employees proposed for the facility may include approximately, 2 office staff and 2 field personnel.

ATTACHMENT D

DESCRIPTION OF PROCESS DESCRIPTION

D: FACILITY'S DETAILED PROCESS DESCRIPTION

D1 General Description

As discussed in the Facility Operations included in Attachment D, U.S. Lubricants, LLC (USL) plans to process used oil to on-specification oil at the 7855 West 2nd Court, Hialeah, Florida facility for specific vendors.

USL will only accept used oil and will utilize the LYE-1000 regeneration system (contains 300-gallon tank) and two 295-gallon double-walled ASTs (Tank 1 & 2) for processing purposes. Refer to **Figure 2** for the Site Plan and Site Photos in **Attachment E**. The LYE-1000 can process approximately, 300 gallons of used in an 8 hour batch treatment. USL plans to conduct one batch treatment per day and therefore, will not exceed +/- 900-gallons total oil at any given time. Used oil will be stored in Tank 1 and processed oil in Tank 2 also located inside the secondary containment.

D2 Process Flow Area

The Department should refer to **Figure 3** for a description of the process flow areas and also **Figure 5** for the process flow of how used oil is processed in the LYE-1000 system. As shown in **Figure 3**, the key facility process operation areas consists of four (4) distinct activities designated by area as the unloading/loading of oil area, the AST tank farm area, the LYE-1000 process regeneration area, and the chemical storage area.

D3 Analysis

Prior to receiving the oil, USL will conduct all verification chemical analysis of the oil offsite using Halogen screening per the proposed Hazardous Waste Analysis Plan to ensure there is no transport, receipt, transfer or processing of material with Halogen content greater than 1,000 ppm will be received at the facility. Further verification analysis if required, will be performed prior to and following each treatment process. All incoming material will be sampled according to USL chemical analysis plan procedures to determine oil quality by Gas Chromatography (GC) via certified analytical laboratory.

D4 Unloading/Loading Area

Oil will be received in the tanker truck and loading and unloading of oil will take place centrally within the warehouse building and on the 6-inch thick concrete slab located throughout the warehouse facility. The entrance area near the overhead roll off door is protected with a 13 feet long by 3-inches high by 4-inch wide berm and the floor is sealed with a compatible epoxy sealant (see **Photo 17** and **18** in **Attachment E**). Any collection of oil for analysis will occur inside the secondary containment area.

D5 Tank Farm Storage Area

Two 295-gallon shop fabricated double-walled aboveground storage tanks (ASTs; Tank 1 & 2) are located within a secondary containment. Prior to processing, used oil will be transferred via 4-inch flex hoses directly from the tanker truck to one 295 gallon aboveground horizontal storage tank (Tank 1) for temporary storage (See **Figure 2**, Site Layout Map and **Photos 3 & 12**). The same process of loading will occur for the new regenerated oil developed from the LYE-1000 Engine Oil Recycling System.

D6 Processing via LYE-1000

Processing will include the use of LYE-1000 regeneration system located within a secondary containment berm and sealed concrete floor area as shown in **Figures 2** and **4**. The will remove impurities, water, organic and inorganics, and including carbon particulate matter. Minimal quantities of water present, if any in the used oil will be evaporated during the regeneration process. The process flow diagram of how the used oil is regenerated into new oil is shown in **Figure 6**. Waste oil is pumped into primary filter via the 4-inch flex pipe from the 295-gallon waste oil AST to remove big size particles, then enters the reaction system, where flocculants and de-coloring additives are added manually. The oil is then mixed and heated and oil is passed through the filter pump (to remove any impurities) resulting into clean oil, which is pumped by oil outlet pump to the 295-gallon double-walled new oil AST (Tank 2). The entire batch treatment process will take approximately, eight (8) hours based on 300-gallons of used oil. USL plans to operate the system based on maximum rate of one batch per day, or as needed.

D7 Chemical Storage and Sludge Area

The Chemical storage area contains two 55-gallon drums containing sodium silicate and tetraethylenepentamine on a spill containment pallet (**Figure 3**). The spill containment pallet will also have one 55-gallon drum for storage of waste sludge recovered from the LYE-1000 system. Volclay 50-lb bags used as a flocculant, will be placed on top of the LYE-1000. Approximately, +/-1 pound/batch of sludge will be generated from the treatment of 300-gallon of used oil, which is removed via a filtration device and discharged into a separate holding tray. The sludge from the filter tray is manually placed into the 55-gallon drums located in the Waste Material Storage Area as shown in **Figure 2** and **Photos 5** and **15**. The waste sludge drums will be profiled, characterized for disposal parameters required by recycling facilities.

U.S. LUBRICANTS, LLC – OWNER/OPERATOR APPROVAL

U.L. Lubricants. LLC is committed to the abiding by the Used Oil Processing Permit Application and all applicable regulatory standards for the facility located at 7855 West 2nd Court, Bay 2, Hialeah, Florida 33012. By signing below, I Jose L. Fernandez, Owner/Operator/Manager acknowledge that I have agree, have read, and understood with the above statements discussed in the Process Description included in Attachment D.

U.S. Lubricants, LLC

_____

Name: Jose L. Fernandez, Owner/Operator/Manager

Signature Date: _____

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The Chemical storage area contains two 55-gallon drums containing sodium silicate and tetraethylenepentamine on a spill containment pallet (**Figure 3**). The spill containment pallet will also have one 55-gallon drum for storage of waste sludge recovered from the LYE-1000 system. Volclay 50-lb bags used as a flocculant, will be placed on top of the LYE-1000. Approximately, +/-1 pound/batch of sludge will be generated from the treatment of 300-gallon of used oil, which is removed via a filtration device and discharged into a separate holding tray. The sludge from the filter tray is manually placed into the 55-gallon drums located in the Waste Material Storage Area as shown in **Figure 2** and **Photos 5** and **15**. The waste sludge drums will be profiled, characterized for disposal parameters required by recycling facilities.

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U.S. Lubricants, LLC

_____

Name: Jose L. Fernandez, Owner/Operator/Manager

Signature Date: _____

ATTACHMENT E

SITE PHOTOGRAPHS

Description: View of the 7855 NW 2nd Ct Bay 2 Unit showing Overhang Roll off Door facing South

Site Photo No: 1	Project Name: U.S. Lubricants, LLC	Date: 01/29/15

Description: View of Overhang Roll off Door showing AST and LYE-1000 Regeneration System facing South

Site Photo No: 2	Project Name: U.S. Lubricants, LLC	Date: 01/29/15

Description: View of the 295-gallon ASTs and the LYE-1000 Regeneration System facing West

Site Photo No: 3	Project Name: U.S. Lubricants, LLC	Date: 01/29/15

Description: View of the LYE-1000 Regeneration System showing Filter Press Tray for sludge collection facing South

Site Photo No: 4	Project Name: U.S. Lubricants, LLC	Date: 01/29/15

Description: Detailed view of the LYE-1000 Regeneration System Filter Press Tray for sludge collection

Site Photo No: 5	Project Name: U.S. Lubricants, LLC	Date: 01/29/15

Description: Side view of the LYE-1000 Regeneration System facing Southwest

Site Photo No: 6	Project Name: U.S. Lubricants, LLC	Date: 01/29/15

Description: View of the LYE-1000 Regeneration System & 300-gallon Reactor Tank facing Southeast

Site Photo No: 7	Project Name: U.S. Lubricants, LLC	Date: 01/29/15

Description: View of the LYE-1000 Regeneration System & Vacuum Pump facing Southeast

Site Photo No: 8	Project Name: U.S. Lubricants, LLC	Date: 01/29/15

Description: View of the Primary Filter just before New Oil enters the 295-Gallon AST

Site Photo No: 9	Project Name: U.S. Lubricants, LLC	Date: 01/29/15

Description: View of the Fine Filter, 4-inch flex line from 295-Gallon Used Oil AST & Electrical Controller facing Northwest

Site Photo No: 10	Project Name: U.S. Lubricants, LLC	Date: 01/29/15

Description: View of Drought Fan for the LYE-1000 Regeneration System facing West

Site Photo No: 11	Project Name: U.S. Lubricants, LLC	Date: 01/29/15

Description: Side view of 295-Gallon Double-walled Used Oil AST, 7.5 gallon spill bucket, 4-inch flex hose, Kruger Gauge, & Vents

Site Photo No: 12	Project Name: U.S. Lubricants, LLC	Date: 01/29/15

Description: Close up view of 295-Gallon Double-walled Used Oil AST, 7.5 gallon spill bucket, 4-inch flex hose, Kruger Gauge, & Vents

Site Photo No: 13	Project Name: U.S. Lubricants, LLC	Date: 01/29/15

Description: View of 7.5 gallon Spill Bucket with 4-inch Flex Hose to Fine Filter of LHE-100 system

Site Photo No: 14	Project Name: U.S. Lubricants, LLC	Date: 01/29/15

Description: View of New Chemical Storage & Waste Material Containment Area for 55-gallon Drums

Site Photo No: 15	Project Name: U.S. Lubricants, LLC	Date: 01/29/15

Description: View of Used Oil Processing/Regeneration Containment Area facing West. Note the concrete floor has been sealed with epoxy sealant

Site Photo No: 16	Project Name: U.S. Lubricants, LLC	Date: 03/18/15

Description: View of Used Oil Processing/Regeneration Containment Area facing South.

Site Photo No: 17	Project Name: U.S. Lubricants, LLC	Date: 03/18/15

Description: View of secondary containment Berm around the Roll off Entrance Door

Site Photo No: 18	Project Name: U.S. Lubricants, LLC	Date: 03/18/15

ATTACHMENT F

EMPLOYEE TRAINING PROGRAM

F: EMPLOYEE TRAINING PROGRAM

U.S. Lubricants, LLC employee training program will consist of the following:

1. Facility Spill Prevention Control and Countermeasure Plan
   - 40 CFR Part 112.
   - Overview of SPCC plan and its purpose.
   - Operation and maintenance of equipment to prevent petroleum discharge.
   - Applicable pollution control laws, rules and regulations.
   - Fluid level monitoring in tanks.
   - Material delivery monitoring/observations
   - Inspection/recordkeeping requirements
   - Spill Response Procedures
2. Hazard Communication
   - Hazardous Materials Identification System
   - Scope, purpose and utilization
3. Container Labeling
   - 40 CFR Part 279 - Standards for the Management of Used Oil
   - Storage, condition, labeling and response to Release of Material stored in containers.
   - Storage locations for empty, used and new storage containers
4. Emergency Preparedness and Contingency Plan
   - Emergency Action Plan
   - Scope, purpose and utilization
5. USDOT Hazardous Materials Handling and Transportation
   - 49 CFR Part 172
   - General awareness/familiarization training
   - Function-specific training
   - Safety training
   - Security awareness training

These training presentations are maintained by the Jose L. Fernandez, Owner/Operator and each employee who work or is involved in the facility operations, will attend and participate in the required training. Documentation of training will be kept in each employee file and a description of the training provided.

U.S. LUBRICANTS, LLC – OWNER/OPERATOR APPROVAL

U.L. Lubricants. LLC is committed to the abiding by the Used Oil Processing Permit Application and all applicable regulatory standards for the facility located at 7855 West 2nd Court, Bay 2, Hialeah, Florida 33012. By signing below, I Jose L. Fernandez, Owner/Operator/Manager acknowledge that I have agree, have read, and understood with the above statements discussed in the Employee Training Program included in Attachment F.

U.S. Lubricants, LLC

_____

Name: Jose L. Fernandez, Owner/Operator/Manager

Signature Date: _____

F: EMPLOYEE TRAINING PROGRAM

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   - Material delivery monitoring/observations
   - Inspection/recordkeeping requirements
   - Spill Response Procedures
2. Hazard Communication
   - Hazardous Materials Identification System
   - Scope, purpose and utilization
3. Container Labeling
   - 40 CFR Part 279 - Standards for the Management of Used Oil
   - Storage, condition, labeling and response to Release of Material stored in containers.
   - Storage locations for empty, used and new storage containers
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   - Emergency Action Plan
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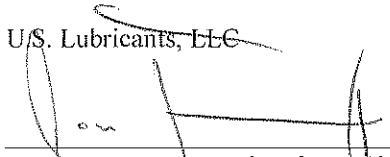
U.S. Lubricants, LLC



Name: Jose L. Fernandez, Owner/Operator/Manager

Signature Date: _____

ATTACHMENT G

WASTE ANALYSIS & SAMPLING PLAN

G: WASTE ANALYSIS PLAN & MATERIAL PROFILING

G1 INTRODUCTION

U.S. Lubricants, LLC (USL) will be collecting only used oil for recycling and is therefore, subject to 2012 Title 40 Volume 28 Section 279-55 and applicable State and Local regulations governing used oil management. As a used oil processing facility, USL will prepare, maintain, and adhere to a Waste Analysis Plan that describes procedures for the analytical requirements as stipulated in 40 CFR 279.53, the rebuttable presumption, and 40 CFR 279.72, the determination of on-specification used oil. The waste analysis plan is also designed to ensure compliance with RCRA waste characterization and management regulations.

G2 Used Oil

As stated in 40 CFR 279.10(b)(ii), used oil containing or thought to contain more than 1000 ppm total halogens is presumed to be a hazardous waste because it has been mixed with halogenated hazardous wastes listed in Subpart D of 40 CFR 261. USL may rebut this presumption by demonstrating that the used oil does not contain hazardous waste (for example, by showing that the used oil does not contain significant concentrations of halogenated hazardous constituents listed in appendix VIII of part 261 of this chapter).

Pursuant to 40 CFR 279.72, a generator, transporter, processor, re-refiner, or burner may determine that used oil that is to be burned for energy recovery meets the regulatory criteria and specifications of the **Table 3** and **Table 4** by performing analyses or obtaining copies of analyses or other information documenting that the used oil meets the above specifications. Every batch of recycled oil generated by the processor equipment shall be tested to demonstrate that the **Table 3** criteria and required parameter listed in **Table 4** analysis are met.

G3 Waste Analysis Plan

Waste oil which has had chlorinated solvent inadvertently mixed with it is considered a hazardous waste by definition. USL will not collect oil that is contaminated with 1000 ppm or greater amounts of chlorinated solvents. USL will conduct analysis of each Client's product by means of halogen content at the Clients facility and before it arrives and processes the oil at their facility.

USL will use the CLOR-D-TECT field screening test kit to perform the analysis. Subsequent used oil from the same generators are screened for halogens using a Tekmate halogen tester or other equivalent halogen sniffer. Results of halogen screening are shown on the used oil manifest. USL will utilize the ASTM D-5384 and USEPA SW-846 Method 9077 using Clor-D-Tect 1000 sample kits provided by Dexsil Corporation. Clor-D-Tect is used to provide a presence of chlorinated organics (halogens) at a level of 1,000 ppm. See attached description and kit instructions.SW-846 Method 9077 "Test for Chlorine in New and Used petroleum Products" and other equivalent method(s) to determine halogen content. If oil contains less than or equal to 999 ppm total halogens, USL will accept the material for processing. If the halogen tester detects no halogens, the used oil is accepted. Refer to **Attachment M** for the Material Safety Data Sheet (MSDS) for the Clor-D-Tect 1000 Chlorine/Halogen Test Kit that complies with OSHA's Hazard Communication Standard, 29 CFR 1910.1200. Also, USL will utilize on-site, contract laboratories, and/or laboratory capabilities of its affiliate companies to satisfy the requirements of its waste analysis plan. All laboratories shall utilize the methodologies and procedures found in USEPA publications SW-846, most current edition. If analysis is required, USL will forward the sample to an Environmental Services Laboratory that is certified by the National Environmental Laboratory Accreditation Program (NELAP) for analysis shown in **Table 4**.

G4 New Processed Oil

All processed oil will be tested to ensure meeting the requirements of 40CFR Part 279.11. The processed oil will be placed into the 295 gallon New Oil AST (Tank #2) until it is full or the production run is decided to be finished. The AST will be sampled and analyzed in accordance with this waste analysis plan (**Table 4**). The AST will remain tagged out of service for the addition of new product until the management decision has been made to begin filling the tank and new analysis is conducted. The analytical results are assigned a Laboratory Analytical Number by the USL in house or contract laboratory. The Laboratory Analytical Number will be recorded on the shipping document and on the Outgoing Used Oil Shipment Log. At a minimum, the processed oil destined for shipment by USL for energy recovery or industrial use will be analyzed for the regulatory allowable limits listed in **Table 3** and the USEPA parameters listed in **Table 4**. Only processed oil, which is under the allowable levels described in 40 CFR Part 279.11 will be shipped for energy recovery or industrial use. All documentation associated with the analysis plan will fall under FDEP SOP requirements for record retention and therefore be addressed as per FDEP SOP.

G5 Hazardous Waste Determination

In accordance to Title 40 of the Code of Federal Regulations (CFR) at Part 262, (262.11), USL will determine if the sludge generated from the LHE-1000 regeneration system is a hazardous waste using the following method(s):

(a) Determine if the waste is excluded from regulation under 40 CFR 261.4.
(b) Determine if the waste is listed as a hazardous waste in subpart D of 40 CFR part 261. Even if the waste is listed, the generator still has an opportunity under 40 CFR 260.22 to demonstrate to the Administrator that the waste from his particular facility or operation is not a hazardous waste.
(c) For purposes of compliance with 40 CFR part 268, or if the waste is not listed in subpart D of 40 CFR part 261, the generator must then determine whether the waste is identified in subpart C of 40 CFR part 261 by either: (1) Testing the waste according to the methods set forth in subpart C of 40 CFR part 261, or according to an equivalent method approved by the Administrator under 40 CFR 260.21; or (2) Applying knowledge of the hazard characteristic of the waste in light of the materials or the processes used. Any waste sludge generated by USL processes will be tested for hazardous waste determination in accordance with 40 CFR Part 261 Subpart C as follows:

Parameter	**Method No.**	**Allowable Limit**
TCLP Arsenic	1311/7060	5.0 mg/L
TCLP Barium	1311/7080	100.0 mg/L
TCLP Cadmium	1311/7131	1.0 mg/L
TCLP Chromium	1311/7191	5.0 mg/L
TCLP Lead	1311/7421	5.0 mg/L
TCLP Mercury	1311/7471	0.2 mg/L
TCLP Selenium	1311/7740	1.0 mg/L
TCLP Silver	1311/7761	5.0 mg/L
TCLP Organics	1311/624	Refer to 40 CFR 261.24
TCLP Organics	1311/625	Refer to 40 CFR 261.24
TCLP Organics	1311/608	Refer to 40 CFR 261.24
TCLP Organics	1311/615	Refer to 40 CFR 261.24

All outgoing hazardous wastes will be transported by a licensed hazardous waste transporter. Designated disposal facilities will be RCRA approved. All analyses will be requested via USL's Chain of Custody (COC) Document. Each sample submitted for analyses will be recorded on USL's Sample Receiving Log, inventory logs and/or the Material Profile Form. All analytical results will be recorded in USL's computer database and hard copies will be provided for generator file. All used oil will be stored in accordance with the facilities SPCC plan and inside a secondary containment. Documentation of the waste analysis will be through facility.

G6 Sampling Frequency

Sampling will be completed as mentioned above on all incoming shipments of used oil prior to processing. After the material has been transferred to the 295-gallon Used Oil AST (Tank 1), a sample will be retrieved to determine the halogen content of the oil prior to processing. Analysis will also be completed on every batch processed and prior to preparing the oil for shipment to determine the quality of the new oil and to verify that the halogen content is below 1,000 ppm. All on-specification certified oil sold by USL shall be analyzed by a Department of Health (DOH) Environmental Laboratory Certification Program (ELCP) certified laboratory in solid and chemical matrix for the analytical and test combinations to be performed. USL shall be in receipt of the laboratory analytical results before selling the selected batch of used oil as "on-specification" oil. All sludge removed from LYE-1000 Regeneration System will be handled according to existing facility wide product transfer procedures to take all necessary precautions to avoid any material release. Sludge removed from the Filter Tray will be emptied after each batch and placed into the 55-gallon drum located in the Waste Storage Area within the secondary containment area for proper profiling, characterization, and disposal to licensed hazardous waste disposal companies as per the parameters discussed in **Table 4** or as required by disposal companies. Based on evaluation of the LHE-1000 process and anticipated 300 gallons of used oil anticipated to be treated per day, USL will generate less than 100 kilograms of hazardous waste per month and therefore, is referred to as "Conditionally Exempt Small Quantity Generator (CESQG)". As per 40 CFR 262.34, onsite accumulation time of hazardous waste (<1000 kg) in a calendar month will remain at the facility 180 days or less.

G7 Record Keeping

USL will be responsible for the completion of the **Table 5** Uniform Waste Transporters Manifest and may also utilize the FDEP Form #62-710.901(2) Titled "Used Oil and Used Oil Filter Record Keeping Form to maintain records to indicate the source of used oil and amount supplied and transported on a daily basis. The laboratory result of the halogen content will accompany the Manifest/bill of lading when filed. All bulk shipments of all oil, received or supplied, will be documented. All analysis of used oil halogen content will be filed within the respective customer folder. The sludge accumulation time will be recorded on the date upon which each period of accumulation began and will be clearly marked and visible on the drums for inspection on each container. While being accumulated on-site, each container and tank is labeled or marked clearly with the words, ''Hazardous Waste''. USL will ensure that all employees are thoroughly familiar with proper waste handling and emergency procedures, relevant to their responsibilities during normal facility operations and emergencies.

U.S. LUBRICANTS, LLC – OWNER/OPERATOR APPROVAL

U.L. Lubricants. LLC is committed to the abiding by the Used Oil Processing Permit Application and all applicable regulatory standards for the facility located at 7855 West 2nd Court, Bay 2, Hialeah, Florida 33012. By signing below, I Jose L. Fernandez, Owner/Operator/Manager acknowledge that I have agree, have read, and understood with the above statements discussed in the Waste Analysis Plan & Material Profiling included in Attachment G.

U.S. Lubricants, LLC

_____

Name: Jose L. Fernandez, Owner/Operator/Manager

Signature Date: _____

provided for generator file. All used oil will be stored in accordance with the facilities SPCC plan and inside a secondary containment. Documentation of the waste analysis will be through facility.

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U.S. Lubricants, LLC

Name: Jose L. Fernandez, Owner/Operator/Manager

Signature Date: _____

ATTACHMENT H

TRACKING PLAN

H: TRACKING PLAN

This management procedure covers the tracking requirements as described in Title 40 Code of Federal Regulations (CFR) Parts 279.56, USL will conduct business in accordance with this tracking plan when receiving used oil or shipping processed new oil. Refer to **Table 5** for a copy of the Uniform Waste Transporters Manifest. The tracking plan will 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.

Records for each shipment will include the following information:

1. The name and address of the transporter who delivered the used oil to the processor/re-refiner;
2. The name and address of the generator or processor/re-refiner from whom the used oil was sent for processing/re-refining;
3. The EPA identification number of the transporter who delivered the used oil to the processor/re-refiner;
4. The EPA identification number (if applicable) of the generator or processor/re-refiner from whom the used oil was sent for processing/re-refining;
5. The quantity of used oil accepted; and
6. The date of acceptance.

USL will keep a record of each shipment of used oil that is shipped to the end user facility. These records will be maintained as shown in **Table 5** and/or **Table 6** if necessary. Records for each shipment will include the following information:

1. The name and address of the transporter who delivers the used oil to the burner, processor/re-refiner or disposal facility;
2. The name and address of the burner, processor/re-refiner or disposal facility who will receive the used oil;
3. The EPA identification number of the transporter who delivers the used oil to the burner, processor/re-refiner or disposal facility;
4. The EPA identification number of the burner, processor/re-refiner, or disposal facility who will receive the used oil;
5. The quantity of used oil shipped; and
6. The date of shipment.

The records described above will be maintained for at least three years.

ATTACHMENT I

PREPAREDNESS AND PREVENTION PLAN

I: PREPAREDNESS AND PREVENTION PLAN

I1 INTRODUCTION

This plan demonstrates USL's intent to comply with the requirements of 40 CFR 279.52 General facility standards. USL will operate the used oil processing facility with an EPA ID number FLR 000 213 777

I2 Maintenance and Operation of Facility

USL as owner and/or operator will maintain and operate the facility in a manner that minimizes the possibility of a fire, explosion, or any unplanned sudden or non-sudden release of used oil to air, soil, or surface water which could threaten human health or the environment.

I3 Required Equipment

Refer to **Table 7** for a list of all emergency preparedness and prevention equipment. USL will maintain an adequate on-site supply of fire extinguishers, fire control equipment, spill equipment, decontamination equipment, and adequate water pressure.

USL maintains internal communications or an alarm system to provide emergency communication and instruction (voice or personnel) to facility personnel. They also have a telephone, cellular system and two way radio capable of summoning inside and outside emergency assistance from local police, fire department, hospital, and other local emergency response organizations.

Portable fire extinguishers, fire control equipment (including special extinguishing equipment, such as that using foam, inert gas, or dry chemicals), spill control equipment and decontamination equipment is shown in **Figure 5** Evacuation Map. The facility has water at adequate volume and pressure to supply water hose streams, or foam producing equipment, or automatic sprinklers, or water spray systems.

I4 Testing and Maintenance of Equipment

The facility communications and alarm system, fire protection equipment, spill control equipment, decontamination equipment shall be checked daily for proper operation in time of an emergency. Refer to **Table 8** for a copy of the Monthly Inspection Checklist.

I5 Access to Communication or Alarm System

If used oil is poured, mixed, spread, or otherwise handled, all USL personnel involved in the operation will have immediate access to an internal alarm or emergency communication device, either directly or through visual or voice contact with another employee. Since USL may have one employee on the premises while the facility is operating, the employee will have immediate access to a device, such as a telephone (immediately available at the scene of operation) or a hand-held two-way radio, capable of summoning external emergency assistance.

I6 Required Aisle Space

USL facility has and will maintain aisle space to allow the unobstructed movement of personnel, fire protection equipment, spill control equipment, and decontamination equipment to any area of facility operation in an emergency.

I7 Communication and Notification with Local Authorities

USL has provided a copy of the facility's contingency plan and emergency procedures to the local fire department, police, hospital, or any other local agency who may be called upon for assistance in case of an emergency at the facility. Each agency is invited to visit the facility to familiarize the agency of the facility operations and emergency procedures. **Table 9** below and also in the list of Tables provides agencies that may be contacted for potential emergencies.

U.S. LUBRICANTS, LLC – OWNER/OPERATOR APPROVAL

U.L. Lubricants. LLC is committed to the abiding by the Used Oil Processing Permit Application and all applicable regulatory standards for the facility located at 7855 West 2nd Court, Bay 2, Hialeah, Florida 33012. By signing below, I Jose L. Fernandez, Owner/Operator/Manager acknowledge that I have agree, have read, and understood with the above statements discussed in the Preparedness And Prevention Plan included in Attachment I.

U.S. Lubricants, LLC

_____

Name: Jose L. Fernandez, Owner/Operator/Manager

Signature Date: _____

I6 Required Aisle Space

USL facility has and will maintain aisle space to allow the unobstructed movement of personnel, fire protection equipment, spill control equipment, and decontamination equipment to any area of facility operation in an emergency.

I7 Communication and Notification with Local Authorities

USL has provided a copy of the facility's contingency plan and emergency procedures to the local fire department, police, hospital, or any other local agency who may be called upon for assistance in case of an emergency at the facility. Each agency is invited to visit the facility to familiarize the agency of the facility operations and emergency procedures. **Table 9** below and also in the list of Tables provides agencies that may be contacted for potential emergencies.

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U.S. Lubricants, LLC

_____

Name: Jose L. Fernandez, Owner/Operator/Manager

Signature Date: _____

ATTACHMENT J

CONTINGENCY PLAN

J: CONTINGENCY PLAN

The contingency plan and emergency procedures are prepared on behalf of USL that proposes to operate a used oil processing facility at 7855 West 2nd Court, Bay 2, Hialeah, Florida 33012. It complies with the requirements of the Title 40 Chapter I Subchapter I Part 279 Subpart F §279.52s.

J1 PURPOSE

The purpose and implementation of the contingency plan is designed to minimize hazards to human health or the environment from fires, explosions, or any unplanned sudden or non-sudden release of used oil to air, soil, or surface water. If required, the plan shall be carried out immediately whenever there is a fire, explosion, or release of used oil which could threaten human health or the environment.

The plan describes processes agreed to by local police departments, fire departments, hospitals, contractors, and State and local emergency response teams to coordinate emergency services, pursuant to paragraph (a)(6) of Subpart F §279.52s. **Table 9** lists names, addresses, and phone numbers (office and home) of all persons qualified to act as emergency coordinator(s) which will be kept up to date by USL. **Table 5** lists all emergency equipment at the facility (such as fire extinguishing systems, spill control equipment, communications and alarm systems (internal and external), and decontamination equipment) and **Figure 5** identifies the area each equipment is located. USL will keep this list updated at all times.

All copies of contingency plan and all revisions to the plan will be maintained at the above-mentioned facility and submitted to all local police departments, fire departments, hospitals, and State and local emergency response teams that may be called upon to provide emergency services. Any amendment of contingency plan and the evacuation plan will be reviewed immediately, and whenever applicable regulations are revised, facility changes[5] and/or if the plan fails in an emergency. This report also includes an evacuation procedures for facility personnel to address all possibilities for an evacuation, if necessary. **Figure 5** describes evacuation routes and alternate evacuation routes (in cases where the primary routes could be blocked by releases of used oil or fires).

J2 Emergency Coordinator Responsibilities

Jose L. Fernandez, is the designated as the Primary Emergency Coordinator (EC) and will assume all responsibilities concerning the use and management of the plan, facility operations and in accordance to all County, State, or Federal regulations. The EC contact information is included in **Table 9**. The EC or his designee(s) are responsible for the implementation of this plan in the event of an emergency and/or accidental release of all material stored at the facility. The EC is responsible to commit funds in the event a spill USL cannot handle and that requires outside help. The EC is responsible for ensuring that all employees are familiar with the content of this plan and are able to implement it, if needed. The EC is responsible for ensuring that this plan is posted and accessible to all employees. In the absence of the EC, Howard Sanchez, Secondary Emergency Coordinator (SEC) is responsible for implementing the plan in the event of an emergency and/or accidental release all materials stored at the facility.

At all times, there will be at least one EC/SEC at the facility or on call to respond to an emergency by reaching the facility within a short period of time (1 hour drive) and has the responsibility of coordinating all emergency response activities. The EC will be familiar with all aspects of this plan, all operations, and activities at the facility, the location and characteristics of the waste handled, the location of all records within the facility, and the facility

[5] The facility changes in its design, construction, operation, maintenance, or other circumstances—in a way that materially increases the potential for fires, explosions, or releases of used oil, or changes the response necessary in an emergency.

layout. Additionally, the EC has the authority to commit the resources needed to carry out this plan. All employees are responsible for reading, understanding, and implementing this plan in the event of an emergency and/or accidental release of all material.

J3 Notification to Local Emergency

USL will provide a copy of this contingency plan needs to all the appropriate departments and agencies listed in **Table 9** upon approval this application. A receipts showing delivery of the plan to the local authorities will be forward to the Department by USL. Any spill over 25 gallons on a pervious surface will be reported to the Department and Miami Dade DERM within 24 hours and a written report will be submitted to these authorities within 15 days of the discharge or incident.

J4 Amendments to Contingency Plan

This plan will be revised, if necessary, whenever:

- ✓ Applicable ordinances or regulations are revised;
- ✓ The plan fails in an emergency;
- ✓ The facility changes in a manner that materially increases the potential for fires, explosions, or the release of hazardous materials / waste, or changes the response necessary in an emergency,
- ✓ The Emergency Coordinators change,
- ✓ The list of emergency equipment changes.

In the event of revisions to this plan, a revised copy will be submitted to the authorities identified in **Table 9**.

J5 Emergency Procedures

J6 Releases and Hazards

Whenever there is a release, fire, or explosion, the EC will immediately identify the characteristics, exact source, amount, and a real extent of any released material / waste. The EC will do this by observation or review of facility records/manifests and, if necessary, by chemical analyses. Concurrently, the EC will assess possible hazards to human health or the environment that may result from a release, fire, or explosion. This assessment will consider both direct and indirect effect of a release, fire, or explosion such as toxic gases, and the effect of any hazardous surface water runoff from water or chemical agents used to control the situation. In addition, USL will also provide a copy of all chemical Material Safety Data Sheets (MSDS) for this facility. A revised copy of this plan will also be maintained at the facility.

J7 Notification and Reporting

In case of an imminent or actual emergency, the EC or his designee, will immediately activate the facility communication system and notify all facility personnel. The facility communication system includes a telephone communication system. The EC will also notify the appropriate agencies listed in **Table 9.**

If the EC has determined that the facility has had a release, fire, or explosion which could threaten human health or the environment outside the facility boundaries, he will report his findings as follows:

- ✓ If the EC's assessment indicated that the evacuation of the local area may be advisable, he will notify the local authorities identified above. Additional assistance from local authorities listed in Table 9 may be obtained as deemed necessary by the EC. The EC will be available to assist local authorities in deciding whether evacuation of the immediate area is needed.

- ✓ The EC will immediately notify the National Response Center at 800/424-8802 and report the following information:

    1. Name and telephone number;
    2. Name and address of facility;
    3. Time and type of accident;
    4. Name and quantity of material involved and to the extent known;
    5. Possible hazards to human health and the environment, outside the facility boundaries.

J8 Emergency Action

During an emergency, the EC will take all reasonable measures necessary to ensure that fires, explosions, and releases do not occur, or spread to other hazardous material / waste at the facility. These measures may include stopping operation, collecting and containing released material / waste, and removing or isolating containers. If the facility stops operating, the EC will monitor for leaks, pressure build up, or rupture in valves, pipes, etc…

After an emergency, the EC will provide for treatment, storage, and disposal of recovered material. The treatment, storage, and disposal of recovered material will be conducted in accordance with applicable local, state, and federal regulations. Waste management companies utilized in the treatment, storage, and disposal of recovered material will be chosen at the EC's discretion. The EC will ensure that, in the affected areas of the facility, no material/waste is incompatible with the released materials until clean-up procedures are completed. All emergency equipment listed in this plan (Table 5) will be cleaned, if necessary, and fit for its intended use before operations are resumed.

J9 Evacuation of Facility

The EC is responsible for determining which emergencies require evacuation. The EC may deviate from the evacuation procedures identified below if necessary to bring the situation under control. An evacuation route map and a site location map are illustrated in **Figure 5**. In the event of a plant evacuation, the following steps will be taken:

a. The signal for evacuation will be given which consists of three long blasts of the air horn. The phone system will be used to notify/divert incoming drivers.

b. All vehicle traffic within the facility will cease. Visitors, contractors, and customers will no longer be allowed in the facility.

c. All personnel, visitors, contractors, and customers will immediately leave through the main gate.

d. No persons will be allowed to enter the plant without authorization from the EC and senior fire department representative.

e. All persons evacuating the facility will assemble the "Meeting Point" located north of the facility as shown in **Figure 5** or a point chosen by the EC if there is danger to the persons at the meeting point area.

f. The EC will conduct a head count to confirm that all persons within the facility are present. Any person not accounted for will be immediately reported to the senior fire department representative.

g. After the emergency, no personnel will be allowed to re-enter the facility until authorization is obtained from the senior fire department representative and the EC.

J10 Recordkeeping

The EC will submit a written closure plan to the Miami Dade DERM and the Department within 5 days of the incident. The EC will also notify the Department in writing before operations resumes of the following:

a. In the affected area(s) of the facility, no material/waste is incompatible with the released material, and
b. All emergency equipment listed in this plan is clean and fit for its intended use.

The EC will document in the facility's operating record the time, date, and details of any incident that required the implementation of this plan. Within 15 days after the incident, the EC will submit a written report on the incident to the Department. The report will include the following information:

a. Name, address, and telephone number of the owner/operator.
b. Name, address, and telephone number of the facility,
c. Date, time, and type of incident,
d. Name and quantity of materials involved,
e. The extent of injuries, if any,
f. An assessment of actual or potential hazards to human health and the environment, if any,
g. Estimated quantity and disposition of recovered material resulting from the incident.

U.S. LUBRICANTS, LLC – OWNER/OPERATOR APPROVAL

U.L. Lubricants. LLC is committed to the abiding by the Used Oil Processing Permit Application and all applicable regulatory standards for the facility located at 7855 West 2nd Court, Bay 2, Hialeah, Florida 33012. By signing below, I Jose L. Fernandez, Owner/Operator/Manager acknowledge that I have agree, have read, and understood with the above statements discussed in the Contingency Plan included in Attachment J.

U.S. Lubricants, LLC

_____

Name: Jose L. Fernandez, Owner/Operator/Manager

Signature Date: _____

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f. The EC will conduct a head count to confirm that all persons within the facility are present. Any person not accounted for will be immediately reported to the senior fire department representative.

g. After the emergency, no personnel will be allowed to re-enter the facility until authorization is obtained from the senior fire department representative and the EC.

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The EC will submit a written closure plan to the Miami Dade DERM and the Department within 5 days of the incident. The EC will also notify the Department in writing before operations resumes of the following:

a. In the affected area(s) of the facility, no material/waste is incompatible with the released material, and
b. All emergency equipment listed in this plan is clean and fit for its intended use.

The EC will document in the facility's operating record the time, date, and details of any incident that required the implementation of this plan. Within 15 days after the incident, the EC will submit a written report on the incident to the Department. The report will include the following information:

a. Name, address, and telephone number of the owner/operator.
b. Name, address, and telephone number of the facility,
c. Date, time, and type of incident,
d. Name and quantity of materials involved,
e. The extent of injuries, if any,
f. An assessment of actual or potential hazards to human health and the environment, if any,
g. Estimated quantity and disposition of recovered material resulting from the incident.

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U.S. Lubricants, LLC

_____

Name: Jose L. Fernandez, Owner/Operator/Manager

Signature Date: _____

ATTACHMENT K

SPILL PREVENTION, CONTROL, COUNTER MEASURE PLAN

K: SPILL PREVENTION, CONTROL, COUNTERMEASURE PLAN

K1 INTRODUCTION

The Spill Prevention, Control, And Countermeasure Plan (SPCCP) is prepared on behalf of U.S. Lubricants, LLC (USL) that proposes to operate a used oil processing facility at 7855 West 2nd Court, Bay 2, Hialeah, Florida 33012. It complies with the requirements of the Title 40 Chapter I Subchapter D Part 112

The regulations apply to owners or operators of non-transportation-related facilities that:

- Drill, produce, store, process, refine, transfer, distribute, use, or consume oil or oil products; and
- Could reasonably be expected to discharge oil to U.S. navigable waters or adjoining shorelines.
- Facilities are subject to the rule if they meet at least one of the following capacity thresholds: Aboveground oil storage capacity greater than 1,320 U.S. gallons, or completely buried oil storage capacity greater than 42,000 U.S. gallons.

This SPCCP has been prepared for the petroleum storages within the USL facility as shown in **Figure 1**, Site Topographic Map and **Figure 2** Site Layout Map indicating petroleum storage areas. **Table 1** provides a summary of the petroleum product storage tanks at the facility.

K2 Facility Identification

FACILITY NAME & LOCATION:	U.S. Lubricants, LLC 7855 West 2nd Court, Bay 2, Hialeah, Florida 33012
FACILITY PHONE NO.	305 477 7338
NAME OF RESPONSIBLE PERSON AT THE FACILITY:	Jose L. Fernandez, Owner/Operator/Manager
DESCRIPTION OF ACTIVITIES:	Facility conducts used oil processing.
PETROLEUM STORAGE CAPACITY:	900 gallons, largest tank is 300 gallons
GEOGRAPHIC LOCATION:	Latitude 25° 53' 38.77"N Longitude 80° 17' 18.98"W
DESCRIPTION OF NEARBY NAVIGABLE WATER THAT COULD BE IMPACTED:	No navigable waters of the United States are located nearby that could be impacted by this facility. Two lakes are located to the west and southeast of the facility.
DATE OF INITIAL OPERATION	Not in Operation. Awaiting Department approval.

K3 Facility Description

USL is located within a light commercial area of Hialeah, Florida. It leases a +/- 1384 square feet and 20 feet high enclosed warehouse building from Commercial management Group, LLC. The Bay 2 is an enclosed building with a concrete subfloor. The remaining outside portion of the facility consists of asphalted parking area.

USL operation will primarily consist of used oil[6] storage, used oil processing, used oil treatment, and used oil marketing subject to 40 CFR 279 of the Resource Conservation and Recovery Act (RCRA). The goal of processing is to regenerate used oil offered for purchase and make it more amenable for distribution back into the market. USL has a registered EPA FLR I.D. 000 213 777 and is designated as a Conditionally Exempt Small Quantity Generator (CESQG) that generates in any calendar month 100 kg/mo or less (220 lbs.) of non-acute hazardous waste and 1 kg (2.2 lbs.) or less of acute hazardous waste. Refer to **Figure 2** for the Site Plan and Site Photos in **Attachment E**.

Used oil storage will be within the +/-300-gallon LYE-1000 regeneration system, two 295-gallon double-walled ASTs (Tank 1 & 2), with a total capacity of +/- 900-gallons oil. All tanks are within a secondary containment.

K4 Facility Operations

Upon entering the facility, a +/-2800-gallon tanker will be staged inside Bay 2 of the facility while awaiting access to the loading/unloading station (see **Figure 3**, Facility Process Flow Map). Used oil will be off-loaded directly via 4-inch flex pipes into Tank 1, a double-walled AST and also within a secondarily containment consisting of a 8 gauge stainless steel welded plates encompassing an area of approximately, 22 feet long by 16 feet wide by 6-inces high, with the interior walls and floor of the containment sealed with oil compatible epoxy sealer. The outside and existing concrete slab area is also sealed with an epoxy sealer and the roll off door bermed to prevent an accidental discharge outside the building. All loading and unloading of oil will take place centrally within the warehouse building and on the 6-inch thick concrete slab located throughout the warehouse facility. Refer to **Figure 3** and **Attachment B** for a detailed description of the proposed process flow.

The used oil will be transferred via 4-inch flex pipes to the LYE-1000 mobile regeneration processor (18.5 feet long by 6 feet wide by 10 feet high). Processing consists of the conversion of used oil into useable oil for their select Client. The process flow diagram of how the used oil is regenerated into new oil is shown in **Figure 6**. Treated oil is pumped by oil outlet pump to the 295-gallon double-walled new oil AST (Tank 2). The entire batch treatment process will take approximately, eight (8) hours based on 300-gallons of used oil. USL plans to operate the system based on maximum rate of one batch per day, or as needed.

The Chemical storage area contains two 55-gallon drums containing sodium silicate and tetraethylenepentamine on a spill containment pallet (**Figure 3**). Minimal quantities of waste sludge is manually recovered from the LYE-1000 system and stored in a 55-gallon drum on the spill containment pallet (**Photos 5** and **15**), profiled, and properly disposed for recycling to approved industrial landfills or incinerators.

The USL anticipates employing approximately, 4 staff members. The variability in the work force is dependent on business growth and will be most likely change in 2015. The types of employees proposed for the facility may include approximately, 2 office staff and 2 field personnel.

K5 Potential Spill Concerns

[6] The term "used oil" means any oil refined from crude oil or synthetic oil, that: (A) has been used and as a result of such use is contaminated by physical or chemical impurities; or (B) is no longer suitable for the services for which it was manufactured due to the presence of impurities or a loss of original properties. This includes both used and unused oils that are being discarded.

The source for potential spills are summarized below

Source of Spill	Location	Potential Type Of Failure	Estimated Quantity (gallons)	Rate of Spill (gal/hr)	Direction of Spill	Secondary Containment	Potential for Occurrence
55-gallon Drums	Chemical Storage Area inside Building	Complete spillage or rupture of drum	5 to 55	5 to 55	Inside building containment area	Spill Containment, & concrete is bermed & sealed	Low as drums are secured
		Leak/puncture	5 to 55	Less than 55			Low to moderate as drums/containers are secured when moved around and are inspected daily
Loading and Unloading Tanker	loading/unloading Area	Transfer hose uncoupling or breakage	Varies	Varies	Concrete Containment	Bermed area at entrance & concrete is sealed	Low to personnel must be present at all times
Aboveground Storage	Two ASTs (Tank 1&2)	Overfilling or hose breakage	300	Varies	Secondary Containment	Double-walled tanks, spill buckets, & secondary containment	Low as personnel are present during filling, double-walled ASTs, and daily volume checks conducted
Transfer Pumps	At LYE-1000 Regeneration System	Discharge/leaking valves or pipes	Varies	Varies	Sec. Concrete Containment	secondary containment	Low as personnel are always present & daily valve & piping checks conducted

As indicated in **Table 2**, "Secondary Containment Calculation for the Used oil Processing or Regeneration Area", the secondary containment is as follows:

Containment No.	Description	Gross Capacity	Net Capacity	Largest Tank (assume oil in piping)	Freeboard
1	#8 Gauge Steel 22-feet long by 16-feet wide by 6-inches high	1316.50	1316.5	400	NA - Indoors

Calculation of secondary containment area:

Containment Basin:	***Actual***	***Increase***	***Total***		
Width	16		16	feet	
Length	22		22	feet	
Min. Depth	0.5		0.5	feet	
Area	352.0	sq. ft.			
Volume	176.0	cu. Ft.			
	1,316.5	**gallons**			
Volume of the Largest Tank:	**400**	**gallons**			
Volume occupied by Equipment:	5.0%	% (estimate percentage - use 5% as default)			
	65.8	gallons			

Therefore, gross capacity of the secondary containment area 3.2 times the volume of the largest tank of 300 gallons plus 100-gallons of potential used oil in the piping. Therefore, the design is adequate.

K6 Facility Conformance

USL attests the following:

1. Section 112.4 requires certain notifications be made if a facility has a discharge of more than 1,000 gallons of oil in a single discharge or more than 42 gallons of oil in each of two discharges. This section also requires a facility amend the Plan if the Regional Administrator requests amendments to the Plan.

This facility will make required notification when appropriate and will either amend the Plan when requested by the Regional Administrator or will appeal.

2. Section 112.5(a) requires the amendment of the SPCC Plan when there is a change to the facility design, construction, operation, or maintenance that materially affects its potential for discharge. This includes adding, moving and decommissioning of containers (including tanks) piping and secondary containment. This also includes a change in product or service or the revision of a standard operating or maintenance procedure.

The SPCC Plan shall be updated:

- within six months after significant changes occur in the facility operations;
- if the Plan fails to provide the desired degree of protection;
- when a period of five (5) years has elapsed since the last revision(s) and the review indicates that a revision is necessary; or as required by changes in the 40 CFR 112 regulations

3. Section 112.5 (b) requires a review and evaluation of the SPCC Plan at least once every five years. The completion of the review must be documented and a statement as to whether the Plan will be amended.

USL has acknowledge the five-year review requirement above and has signed the signed statement for this review.

4. Section 112.5(e) requires a Professional Engineer certify any Technical Amendments to this Plan.

Any Technical Amendments to this Plan will be certified by a Professional Engineer.

5. Section 112.7(a)(1) requires a discussion of the facility's conformance with SPCC Plan requirements.

The Plan developed herein shall conform to the regulatory format provided by the regulation.

6. Section 112.7(a)(2) requires a description of non-conforming issues, the reasons for non-conformance and the measures to achieve equivalent environment protection adopted by the facility.

Any issues of non-conformance are described in the discussion provided in response to the specific requirement.

7. Section 112.7(a)(3) requires a physical description of the facility, including site diagrams showing container storage locations and contents, transfer stations, piping, and buried tanks;

This information is provided in this document with specific reference to **Figure 2** and **Figure 3**. There are no buried petroleum storage tanks at this facility.

i) Information defining the types and capacities of oil storage;

This information is provided by **Table 1** of the report.

ii) A procedure for the prevention of discharge during routine handling procedures;

This information is provided below titled as "Oil Transfer Procedure"

1. Smoking is prohibited while offloading petroleum or fueling vehicles.

2. Verify that all valves in the secondary containment berm are closed. Move the truck into the unloading area, stop the engine, (unless required to operate a pump), set the hand brake, place wheel chocks, and connect a grounding cable between the tank and the truck frame. Verify sufficient volume in tank (if unloading truck) or in the truck (if loading truck) prior to starting transfer.

3. Drivers must be present during all petroleum transfers. No petroleum will be transferred to or from a storage tank unattended. The driver must be awake, have an unobstructed view of the tank and be within 25 feet of the truck. All transfer operations must be shut down if the driver leaves area.

4. All employees and all drivers must have knowledge of the nature of the materials they are handling and must have been trained on the procedures to be followed in an emergency.

5. Hose connections, valves, and pumps must be visually inspected continually during transfers to check for leaks or drips. All leaks must be stopped immediately or contained in a drip pan.

6. All areas, including loading/unloading area, truck parking area, etc. are to be kept free of petroleum materials and excessive residue.

7. To minimize the release of any material during transfer operations, drip pans or buckets should be used under all hose connections. Drip pans and buckets must be cleaned up before leaving the area. Oil dry, rags, shovels, etc. are available at the facility for cleanup in the event of a spill or drip.

8. The available capacity in the storage tank must be checked and confirmed before material is transferred from a truck to the tank to ensure the storage tank is not overfilled.

9. All spills must be reported to the facility manager.

10. Drivers have the responsibility to keep the transfer area clean and free of petroleum materials, to prevent spills from occurring, to immediately and thoroughly cleanup any material spilled, and to report spills to the facility operator.

11. After unloading or unloading is finished, disconnect and secure all hoses, disconnect the grounding cable, assure that the vehicle's lowermost drain and outlets are closed and secured, and assure that tank valves and other closures are closed and free of leaks before removing the wheel chocks and driving the truck from the transfer area.

Container Handling Procedure

1. Company policy prohibits smoking in petroleum product container storage areas.

2. All containerized materials must be secured prior to moving.

3. During loading and unloading containers from a truck, the truck should be moved into the unloading area with the engine stopped and hand brake set.

4. Personnel using or handling containers must be aware of the materials they are handling and must be trained in the procedures to follow in an emergency, such as rupture or puncture of the container.

5. All containers must be labeled as to content.

6. All areas, including concrete containment and storage rooms or trailers, are to be kept free of spilled material.

7. All spills must be reported to the facility manager.

iii) A description of secondary containment around storage sites;

This information is discussed earlier in subsection K1.5 and provided by **Table 2**

iv) Procedures for the discovery of, control of, and response to a discharge;

SPILL RESPONSE PROCEDURES

Response to spills is conducted according to the procedures detailed in the following subsections. It must be noted that, if several personnel respond to an incident, many of the following procedures can be conducted concurrently. For example, while one person is following the emergency notification procedures, other personnel could be implementing actions to contain the spill.

I. Spill Notification Procedure

Upon the discovery of a spill, the following notifications must be made.

1. The Facility Manager (Primary Emergency Coordinator) must be notified immediately. If he/she cannot be located, then one of the Alternate Emergency Coordinators or the Company Environmental Coordinator should be called. (See Table 9 for phone numbers.) The person who discovers the spill should be prepared to give the following information:

- his/her name and position with the company;
- material spilled and estimated amount;
- source and cause of the spill, if known;
- area affected;
- time the spill was first observed; and
- actions initially taken.

2. The Primary Emergency Coordinator (Facility Manager), First Alternate Emergency Coordinator (Operations Manager), and the Designated Company Environmental Coordinators are the only persons authorized to make agency notifications. If the facility has released petroleum materials off site in harmful quantities as defined in 40 CFR 110.3 (i.e., it has caused a sheen or discoloration on any water body), an authorized person shall report the incident to the regulatory agencies listed in the Emergency Notification Sheet in Appendix B. In reporting, the authorized person shall be prepared to give the following information:

- his/her name and position with the company;
- facility name, location, and phone number;
- material spilled and amount;
- source and cause of the spill, if known (do not speculate);
- area affected;
- time the spill was first observed;
- extent of injuries, if any;
- any evacuation precautions taken;
- response actions conducted, including containment and cleanup underway;
- estimated time to complete remediation;

- potential hazards to human health or the environment; and
- names of other individuals and organizations contacted.

3. For a release greater than 42 gallons into the environment (i.e., soil, water), the authorized person shall determine if the emergency response contractor should be contacted for cleanup assistance.

4. If the facility has discharged oil into or onto the navigable waters of the United States in any of the following quantities:

- more than 1,000 gallons in a single spill event, or
- more than 42 gallons in each of two spill events within a 12-month period,

an authorized company representative must submit a written report as described in subsection IV of this Section.

5. Florida has specific reporting requirements:

a) A discharge of any amount of a pollutant (this includes oil) that enters, or threatens to enter, waters of the state must be reported as soon as possible, but no later than one hour after the discovery of the occurrence to the NRC and the FL State Warning Point phone number in Appendix B.

b) A discharge of 25 gallons of oil or more to a "pervious" surface must be reported as soon as possible, but no later than 24 hours.

II. Response Preparation

Appropriate containment/spill response equipment is kept in close proximity to all potential spill areas. A sufficient supply of this material should be available to all locations to ensure that potential off-site migration pathways can be adequately protected. The materials to be located near potential spill areas include:

- a small (20 to 30-gallon) drum containing:
  - materials suitable for absorbing petroleum products (e.g. kitty litter, corn cobs, oil-dri, absorbant socks or pads, etc);
  - plastic (or other non-sparking material) shovel or scoop;
  - chemical resistant gloves, protective aprons, safety glasses or goggles, and/or other appropriate personal protective equipment;
- sandbags;
- fire extinguishers;
- shovels; squeegees, and brooms, pipe wrench, drum plug wrench;
- salvage drums and overpacks.

III. Response Procedure

Upon detection of a spill, personnel responding will immediately:

- put on proper personal protective equipment, which, at a minimum, includes chemical-resistant gloves and a rubber apron (or equivalent);

- identify the source and cause of the spill;
- take appropriate measures to stop the flow of material (e.g., reconnect hose, plug hole, shut valve, transfer liquid to an empty drum, etc.);
- quickly estimate the magnitude of the spill;
- using absorbent material, sandbags, or similar material, block drainage ways, if there is a potential for material to flow off the property;
- contain any material, using cleanup and containment equipment, that may have escaped the storage vessel;
- recover and containerize spilled material (as much as possible) into a drum or container and dispose of properly to a landfill permitted for such material, to a recycler capable of processing off-specification oil, or to a recycler permitted for disposal;
- decommission the tank (if the spill was from a tank) and schedule it for repair after the cause of the spill or failure has been determined; and
- obtain assistance from a spill cleanup contractor if it is determined that a spill is uncontrollable and/or contamination outside the facility has occurred.

After the spill has been contained and cleaned up, the Primary Emergency Response Coordinator (Facility Manager), the Alternate Emergency Response Coordinator (Operations Manager), or the designated Company Environmental Coordinator must ensure that all spill response equipment is restocked and ready for usage.

IV. Written Agency Notification

If the facility has released petroleum materials off site in harmful quantities, which means it has caused a sheen or discoloration on any navigable waters of the United States, the Company Environmental Coordinator should report the incident to the National Response Center using one of the forms provided in Table 9.

If the facility has discharged oil into or on the navigable waters of the United States in any of the following quantities:

- more than 1,000 gallons in a single spill event, or
- more than 42 gallons in each of two spill events within a 12-month period,

The Company Environmental Coordinator (or designee) must submit a written report to the Regional Administrator of the Environmental Protection Agency, Region IV within 60 days. The report shall contain the information provided by the form in Table 9.

Florida has specific reporting requirements. These include:
a) A discharge of any amount of a pollutant (this includes oil) that enters, or threatens to enter, waters of the state, and
b) A discharge of 25 gallons or more of oil to a "pervious" surface.
The written report must be submitted on Florida Discharge Report Form 62-761.900(1), which is provided in Table 9. A copy of any report sent to the Regional Administrator must also be submitted to the Florida Department of Environmental Protection.

v) Methods of disposal of recovered materials; and

Methods for disposal of recovered material has been discussed above.

vi) And, a contact list and phone numbers for appropriate individuals and agencies to be notified in the event of a spill.

This contact list is provided in **Table 9** and may be copied and laminated for posting in key areas.

8. Section 112.7(a)(4) Unless facility has submitted a response plan under 112.20, provide information and procedures to enable person to accurately report a discharge.

Refer to the forms below that addresses each required data subject. Facility personnel are trained in completing the form and communicating to the relevant agencies. Use of this form is discussed above.

FLORIDA DISCHARGE REPORTING FORM 62-761.900(1)
SPILL RESPONSE NOTIFICATION FORM

Reporter's Full Name: _____
Position: _____
Phone Numbers: Day _____
Evening _____
Company:
Address:
City, State, Zip:

Facility Longitude: Facility Latitude:

INCIDENT DESCRIPTION
Incident Address/Location: _____
Container Type: _____
Date and Time of Discharge: _____ _____AM/PM
Material Discharged: _____
Discharged Quantity: _____ Gallons
Did Material Reach Water? _____ (Y/N) If so, What Quantity? _____ Gallons
Media Affected? Air? Y or N Water? Y or N Land? Y or N
Description of Medium Affected: _____
_____
Source and/or Cause of Incident: _____
_____
_____
_____
_____
_____

RESPONSE ACTION AND IMPACTS
Actions Taken to Correct, Control, or Mitigate Incident: _____
_____
_____
_____
_____
_____

Number of Injuries: _____ Number of Deaths: _____
Evacuation Required? _____ (Y/N) Number Evacuated: _____
Damage Incurred: _____ (Y/N) Damage Cost Estimate: $_____

NOTIFICATIONS
USEPA? _____ (Y/N) STATE? _____ (Y/N) Other? See Notification List

ADDITIONAL INFORMATION: _____
_____
_____

Discharge Reporting Form

PLEASE PRINT OR TYPE

DEP Form # 62-761.900(1)
Form Title Discharge Reporting Form
Effective Date _____

Instructions are on the reverse side. Please complete all applicable blanks

1. Facility ID Number (if registered):_____ **2. Date of form completion**:_____

3. General information
Facility name:_____
Facility Owner or Operator: _____
Facility Contact Person_____Telephone number: ( )_____County: _____
Faciility Mailing address: _____
Location of discharge (facility street address):_____
Latitude and Longitude of discharge (If known.)_____

4. Date of receipt of test results or discovery of confirmed discharge: _____month/day/year

5. Estimated number of gallons discharged:_____

6. Discharge affected: [ ] Air [ ] Soil [ ] Ground water [ ] Drinking water well(s) [ ] Shoreline [ ] Surface water (water body name) _____

7. Method of discovery (check all that apply)

[ ] Liquid detector (automatic or manual)	[ ] Internal inspection	[ ] Closure/Closure Assessment
[ ] Vapor detector (automatic or manual)	[ ] Inventory control	[ ] Groundwater analytical samples
[ ] Tightness test	[ ] Monitoring wells	[ ] Soil analytical tests or samples
[ ] Pressure test	[ ] Automatic tank gauging	[ ] Visual observation
[ ] Statistical Inventory Reconciliation	[ ] Manual tank gauging	[ ] Other _____

8. Type of regulated substance discharged: (check one)

[ ] Unknown	[ ] Used/waste oil	[ ] Jet fuel	[ ] Heating oil	[ ] New/lube oil
[ ] Gasoline	[ ] Aviation gas	[ ] Diesel	[ ] Kerosine	[ ] Mineral acid

[ ] Hazardous substance - includes CERCLA substances from USTs above reportable quantities, pesticides, ammonia, chlorine, and derivatives (write in name or Chemical Abstract Service (CAS) number)_____
[ ] Other_____

9. Discharge originated from a: (check all that apply)

[ ] Dispensing system	[ ] Pipe	[ ] Barge	[ ] Pipeline	[ ] Vehicle
[ ] Tank	[ ] Fitting	[ ] Tanker ship	[ ] Railroad tankcar	[ ] Airplane
[ ] Unknown	[ ] Valve failure	[ ] Other Vessel	[ ] Tank truck	[ ] Drum

[ ] Other_____

10. Cause of the discharge: (check all that apply)

[ ] Loose connection	[ ] Puncture	[ ] Spill	[ ] Collision	[ ] Corrosion
[ ] Fire/explosion	[ ] Overfill	[ ] Human error	[ ] Vehicle Accident	[ ] Installation failure

[ ] Other_____

11. Actions taken in response to the discharge: _____

12. Comments: _____

13. Agencies notified (as applicable):

[ ] State Warning Point ***(904) 488-1320***	[ ] National Response Center ***1-800-424-8802***	[ ] Fire Department. _____	[ ] County Tanks Program _____	[ ] DEP (district/person) _____

14. To the best of my knowledge and belief all information submitted on this form is true, accurate, and complete.

_____ Printed Name of Owner, Operator or Authorized Representative

_____ Signature of Owner, Operator or Authorized Representative.

9. Section 112.7(a)(5) requires Plan organization that describes procedures to be used when a discharge occurs in a way that makes them readily usable in an emergency, and include appropriate supporting material as appendices.

This Plan incorporates training and the use of one-page sections that can be easily referenced and used. USL will use an electronic training database to manage personnel training requirements. Training certificates documenting training activities are will be provided as they become available.

10. Section 112.7(b) requires a prediction of spill flow direction, rates of flow, and quantities that could be discharged.

Experience indicates there is a low potential of tank failure (such as overflow, rupture, and leakage) at the facility. This can be attributed to several factors:

1. Tanks operate at ambient temperature and pressure and are equipped with the level gauges and an overflow alarm and secondary containment.
2. Piping and valves are not in areas exposed to vehicular traffic.
3. The tanks, pumps, valves, and piping are inspected daily with inspection findings recorded in facility inspection logs.
4. All tanks were thickness tested by a professional engineer in 2002.

Spillage of material is most likely to occur during tank transfer. However, the quantity of material that would typically be spilled is small. Personnel are required to be present during transfer, and transfer activities are conducted in contained areas provided with concrete barriers and elevation controls to prevent migration and to facilitate cleanup. In the unlikely event of a release of material and failure of the secondary containments, it appears that a spill would flow toward the retention pond to the southwest.

11. Section 112.7(c) requires provision of containment system and/or diversionary structures or equipment capable of containing a spill and must be constructed so that any discharge from a primary containment system will not escape the containment system before cleanup occurs. At a minimum, you must use one of the following or its equivalent: dikes, berms, retaining walls, curbing, drip pans, sumps and collection systems, culverting, gutters, weirs, booms, other barriers, spill diversion ponds, retention ponds, or sorbent materials.

This facility provides secondary containment as follows:

- Tanks 1, 2 are double-walled ASTs, & Tank 3 is a single-walled AST served by a secondary containment #1.
- drum storage area " Chemical Storage Area" is served by containment pallet.

12. Section 112.7(d) requires a clear explanation if you determine that installation of certain specified structures or equipment is not practicable. For bulk containers, conduct both periodic integrity testing of the containers, conduct periodic integrity and leak testing of valves and piping, development of an oil spill contingency plan in cooperation with local authorities, and a written commitment of adequate response resources if structural secondary containment cannot be provided.

This action is considered unnecessary due to the secondary containment provided.

13. Section 112.7(e) requires written procedures and records for periodic inspection and tests of the storage areas and containers.

INSPECTION PROCEDURE FOR SPCC PLAN

The following items, if present, must be inspected by trained personnel:

OBSERVE for puddles of product or an oil sheen on any standing water.

ABOVEGROUND PIPING: Liquid bulk fill lines will be inspected for leaks, evidence of leaks, and evidence of potential leaks.

TANKS and PARKED TRUCKS: All bulk storage containers and associated piping will be visually inspected for leaks, overflows, and signs of potential problems. Special emphasis will be placed on the inspection of seams, patches, piping connections, sight glasses, and other openings. Valves should be in their proper position and locked or sealed, if required.

SECONDARY CONTAINMENT: Secondary containment areas will be inspected for adequate capacity and leaks, cracks, or other signs of failure.

TRANSFER PUMPS: Transfer pumps will be inspected for leaks around the housing. Associated piping will be inspected for leaks at the pump connections.

DRUMS: Drums will be inspected when received for condition. Drums will not be accepted if there is evidence of leaks or mishandling. Drums in storage will be examined for leaks, with special attention given to the bottom seam.

DRAINS: There are no drains present at the facility

TANK OVERFILL ALARMS: Overfill alarm systems should be tested periodically for proper function.

DISPENSING HOSES: Dispensing hoses should be inspected for leaks and hose deterioration.

SPILL RESPONSE EQUIPMENT: Check spill response equipment to make sure that it is fully stocked and in good condition. Replace or upgrade as needed.

Table 8 provides an inspection form for conducting inspections aimed at preventing and detecting spill threats. Records of inspections are kept on file for a minimum of three years. Similarly, records of tests such as container integrity tests are kept on site for a minimum of three years. The General Manager is responsible for implementation of the inspection program, as well as directing corrective measures.

The inspection program is intended to provide a mechanism to prevent and detect system malfunctions, equipment deterioration, and operator errors, and to provide early warning of the potential for such events in order that corrective and preventative actions may be taken. The inspection program focuses on safety, emergency equipment, and environmental monitoring. The program is intended to be implemented by qualified and trained individuals assigned the responsibility to detect any unsafe conditions at the facility and to help prevent adverse consequences. The designated individuals have the training and authority to:

1. Implement the required inspections;
2. Perform necessary evaluations and hazard assessments; and
3. Recommend appropriate corrective or remedial actions.

The inspection is performed daily. Each item listed on the inspection form is evaluated in such a manner and on such a frequency necessary to alert facility personnel prior to the development of a serious problem. The level of response to a problem is determined by the nature and seriousness of the problem identified, with the protection of personnel and the prevention of adverse impact on the environment being of paramount concern.

14. Section 112.7(f)(1), (2), and (3) require training of oil-handling personnel at least annually and designation of a person at the facility accountable for discharge prevention.

Jose L. Fernandez, Owner/Operator/Manger is the designated person accountable for discharge prevention. Newly hired operational personnel participate in the USL spill prevention and control training program. All employees participate in a regularly scheduled review of the SPCC Plan and its procedures. Facility personnel are trained in general orientation and operation of the facility. An on-the-job training program related to the specific duties of each job function is specifically provided in combination with the standardized written, visual, and audible training. In addition, every operational employee participates in the continuing training to maintain proficiency, to learn new techniques and procedures, and to reinforce safety and quality consciousness.

USL will conduct annual employee meetings that are used as a forum to reinforce understanding of SPCC Procedures. Past spill events (if applicable) and failures are described, malfunctioning components are discussed, and recently developed or changed precautionary measures are addressed. The following summarizes the training program:

<u>Spill Prevention and Countermeasures Plan:</u> Appropriate oil-handling personnel have been instructed in the following spill prevention and countermeasure requirements.

- No tanks, drums, or compartments are to be filled without first checking levels.
- No bulk product deliveries are to be conducted unattended.
- Documented inspections of containers (drums, totes and tanks) used for oil storage or transfer are to be conducted monthly on any appropriate form.
- Accumulated precipitation shall be inspected for the presence of an oil sheen prior to removing pumping accumulation into drum or tank for disposal.
- Containers are to be checked daily for any signs of leaks, deterioration, or vandalism. Visual daily checks of piping, valves, pumps, and hoses are to be made for signs of leaks.
- No phase of material transferring or processing shall be conducted unattended by personnel.

All personnel are trained in:

- The location of emergency response materials;
- Containment procedures;
- Fire and explosion response;
- Shutdown of liquid handling equipment; and
- Spill notification procedures.

15. Section 112.7(g)(1) requires facilities handling, processing, and storing oil to be fully fenced with entrance gates locked or guarded, when the facility is unattended.

All waste-handling and storage facilities are located within the general perimeter of the facility. The facility has one overhead door which is locked at all times. Normal and routine access to the facility is monitored by USL personnel.

16. Section 112.7(g)(2) requires the securing of valves, which may permit direct outward flow of the containers contents to the surface, to assure remaining in the close position when not in operation.

No water draws or drain valves for the secondary containment exist at the facility.

17. Section 112.7(g)(3) requires the pump starter controls to be locked in the "off" position and to be located at a site accessible only to authorized personnel when the pump is not operating.

All containment systems, valves, piping, and electrical control systems are located within the Bay 2 and enclosed. There are no special delivery pipelines to the facility.

18. Section 112.7(g)(4) requires adequate lighting to prevent vandalism and to aid in the discovery of discharges during night hours.

Adequate lighting is provided inside Bay 2 at normal operating daytime hours.

19. Section 112.7(h)(1) requires use of quick drainage systems when drainage from loading/unloading areas not provided with catchment.

The LYE-1000 is located in secondary containment, which provides approximately 1316 gallons of secondary containment.

20. Section 112.7(h)(2) requires measures to prevent vehicles from departing before complete disconnection of transfer lines.

Loading and unloading procedures meet the requirements of the Department of Transportation (DOT) for the transfer of hazardous and non-hazardous materials. Personnel are trained in accordance with DOT and OSHA requirements..

21. Section 112.7(h)(3) requires inspection of the lower-most drain and all outlets prior to filling and departure of any tank truck to prevent spillage on site or during transit from the site.

The load/unloading procedures have been discussed earlier in this section.

22. Section 112.7(i) requires evaluation of a container for risk of failure due to brittle fracture upon repair, alteration, reconstruction, or change of service.

If an aboveground tanks undergoes a repair or alteration that might affect the risk of a discharge due to brittle failure, the tanks will be evaluated prior to being placed back in service. Repairs, alterations, and evaluations are typically conducted by a qualified contractor rather than facility maintenance personnel.

23. Section 112.7(j) requires discussion of more stringent State rules.

The Florida DEP's regulation 62-762.501(2)(c)3.b states, *"Dike field areas with secondary containment shall...contain a minimum of 110% of the maximum capacity of the tank or of the largest single walled tank within the dike field area."*

All secondary containment areas are of sufficient size to contain at minimum 110% of the maximum capacity of the largest tank within the containment area.

24. Section 112.8(a) requires compliance with Sections 112.7 provisions.

As previously addressed, compliance with Section 112.7 provisions has been established.

25. Section 112.8(b)(1) requires control of drainage from diked storage areas.

No outfalls are present at the facility. Pumps are manually activated. All containments are indoors.

26. Section 112.8(b)(2) limits valve use to manual, open-and-closed design valves. Flapper-type drain valves are not allowed.

No drain valves are provided for the containments.

27. Section 112.8(b)(3) requires design of facility drainage systems for undiked areas subject to discharge to flow into catchment basins. Catchment basins may not be located in areas subject to periodic flooding.

This section is not applicable to the facility.

28. Section 112.8(b)(4) requires that a diversion system be provided if Section 112.8(b)(3) cannot be met.

This section is not applicable to the facility.

29. Section 112.8(b)(5) requires fail-safe design for systems requiring pumped transfer within treatment systems for drainage waters.

All pumped transfer systems are manually activated and controlled.

30. Section 112.8(c)(1) requires the use of containers constructed of oil-compatible materials.

All tanks are constructed of carbon steel, which is an oil-compatible material. Stored materials are stored at ambient temperature and pressure.

31. Section 112.8(c)(2) requires provision of secondary containment for bulk storage tank installations for the capacity of the largest container to be stored plus precipitation freeboard.

Secondary containment structures constructed of steel are provided at the facility for the oil storage tanks and containment area is of sufficient size to contain the contents of the largest tank. Loading/unloading areas are located inside the containment. The drum storage area is also on spill containment and the building is roofed and is not subjected to the precipitation freeboard.

32. Section 112.8(c)(3) requires all dike water discharges to be controlled by: keeping bypass valve closed, inspecting retained rainwater prior to discharge, open and close the valve under responsible management, and keep records of such events.

Dike wall drain valves are maintained in the closed position when not in use.

33. Section 112.8(c)(4)&(c)(5) require protection of buried and partially buried metallic storage tanks from corrosion by coatings or cathodic protection backed by periodic leak testing.

There are no underground tanks used for the storage of oil at this facility.

34. Section 112.8(c)(6) requires integrity testing of aboveground containers by frequent visual inspections and by regularly scheduled non-destructive methods. All inspections and test must be recorded.

All tanks are inspected on a regular basis to assess tank integrity by the Owner/Operator or other qualified personnel to assess tank integrity. Formal daily inspections record include the following:

- Evidence of leaks or spills;
- Condition of tanks;
- Condition of piping and pumps; and
- Condition of secondary containment areas.

These inspections utilize the form provided in **Table 8**.

35. Section 112.8(c)(7) requires monitoring for oil contamination of internal heating coil discharges to open watercourses or the provision of pre discharge storage or treatment.

This section is not applicable to the facility.

36. Section 112.8(c)(8) requires engineering of containers to provide for high level alarms, high liquid level pump cutoff, or manning direct level reading devices. Regular testing of liquid level sensing devices is required.

The possibility of a significant discharge is reduced by the following equipment/processes:

- Direct visual tank level gauges;
- Audible overflow alarm and ancillary overflow containment tank;
- Manned transfer operations; and,
- Regular inspections of tanks and ancillary equipment.

37. Section 112.8(c)(9) requires observation of effluent treatment facilities frequently enough to detect possible system upsets that could cause a harmful discharge.

This section is not applicable to the facility

38. Section 112.8(c)(10) requires prompt correction of visible discharges.

If it is determined that the integrity of a tank or ancillary equipment is compromised, the tank or equipment will be taken out of service, the problem evaluated, and appropriate steps taken to correct the deficiencies.

39. Section 112.8(c)(11) requires provision of secondary containment for mobile containers.

Tanker trucks containing waste materials are parked inside the building that is served by containment.

40. Section 112.8(d)(1) requires cathodic protection and protective wrapping and coating of piping installed or replaced on or after 8/16/02. Inspection for corrosion of buried piping exposed for any reason is required. Corrosion damage must be repaired.

The facility uses no underground piping for petroleum materials.

41. Section 112.8(d)(2) requires capping or blank flanging of transfer piping when not in service. The transfer piping must also be marked as to the origin.

Out-of-service piping shall be removed, capped, or blank flanged.

42. Section 112.8(d)(3) requires proper design of piping supports to minimize abrasion and corrosion and allow for expansion and contraction.

Piping supports are designed to allow for expansion and contraction while minimizing abrasion and corrosion.

43. Section 112.8(d)(4) requires regular inspection of valves, piping, and appurtenances.

All valves and fittings are periodically inspected for leaks (Table 8). Valves and piping are manned during material transfers.

44. Section 112.8(d)(5) requires signs warning vehicles entering the facility of the presence of overhead piping.

No overhead piping in traffic ways is present at the facility.

45. Section 112.20(a) requires the owner or operator of a facility that, because of its location, could reasonably be expected to cause substantial harm to the environment by discharging oil into navigable waters to

submit a facility response plan to the Regional Administrator. Section 112.(f)(1) and Attachment C-1 provide criteria to determine if the facility "could reasonably be expected to cause substantial harm."

The "Certification of Substantial Harm Determination Form" completed below demonstrates that a Facility Response Plan is not required for this facility.

CERTIFICATION OF SUBSTANTIAL HARM DETERMINATION FORM

FACILITY NAME: U.S. Lubricants, LLC
FACILITY ADDRESS: 7855 West 2nd Court, Bay 2, Hialeah, Florida 33012

1. Does the facility have a maximum storage capacity greater than or equal to 42,000 gallons and do the operations include over water transfer of oil to or from vessels?

   Yes _____ No __X__

2. Does the facility have a maximum storage capacity greater than or equal to one million (1,000,000) gallons and is the facility without secondary containment for each aboveground storage area sufficiently large to contain the capacity of the largest aboveground storage tank and precipitation within the storage area?

   Yes _____ No __X__

3. Does the facility have a maximum storage capacity greater than or equal to one million (1,000,000) gallons and is the facility located at a distance (as calculated using the appropriate formula in Attachment C-III or an alternative formula* considered acceptable by the RA) such that a discharge from the facility could cause injury to fish, wildlife, and sensitive environments?

   Yes _____ No __X__

4. Does the facility have a maximum storage capacity greater than or equal to one million (1,000,000) gallons and is the facility located at a distance (as calculated using the appropriate formula in Attachment C-III or an alternative formula* considered acceptable by the RA) such that a discharge from the facility would shut down a public drinking water intake?

   Yes _____ No __X__

5. Does the facility have a maximum storage capacity greater than or equal to one million (1,000,000) gallons and, within the past 5 years, has the facility experienced a reportable spill in an amount greater than or equal to 10,000 gallons?

   Yes _____ No __X__

*If an alternative formula is used, documentation of the reliability and analytical soundness of the alternative formula must be attached to this form.

CERTIFICATION – INCLUDES ALL SUBSTATIONS

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.

_____	Owner/Operator
Signature	Title
Jose L. Fernandez	_____
Name (please type or print)	Date

CERTIFICATION OF SUBSTANTIAL HARM DETERMINATION FORM

FACILITY NAME: U.S. Lubricants, LLC
FACILITY ADDRESS: 7855 West 2nd Court, Bay 2, Hialeah, Florida 33012

1. Does the facility have a maximum storage capacity greater than or equal to 42,000 gallons and do the operations include over water transfer of oil to or from vessels?

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   Yes _____ No ___X___

3. Does the facility have a maximum storage capacity greater than or equal to one million (1,000,000) gallons and is the facility located at a distance (as calculated using the appropriate formula in Attachment C-III or an alternative formula* considered acceptable by the RA) such that a discharge from the facility could cause injury to fish, wildlife, and sensitive environments?

   Yes _____ No ___X___

4. Does the facility have a maximum storage capacity greater than or equal to one million (1,000,000) gallons and is the facility located at a distance (as calculated using the appropriate formula in Attachment C-III or an alternative formula* considered acceptable by the RA) such that a discharge from the facility would shut down a public drinking water intake?

   Yes _____ No ___X___

5. Does the facility have a maximum storage capacity greater than or equal to one million (1,000,000) gallons and, within the past 5 years, has the facility experienced a reportable spill in an amount greater than or equal to 10,000 gallons?

   Yes _____ No ___X___

*If an alternative formula is used, documentation of the reliability and analytical soundness of the alternative formula must be attached to this form.

CERTIFICATION – INCLUDES ALL SUBSTATIONS

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.

_____ Owner/Operator
Signature Title

Jose L. Fernandez _____
Name (please type or print) Date

ATTACHMENT L

CLOSURE PLAN

L: CLOSURE PLAN

L1 INTRODUCTION

This closure plan identifies steps necessary to perform final closure of the USL facility at any point during its active life. Although, there is no intent for closure of the facility at this time, it includes a description of how each hazardous waste management unit(s), the LYE-1000 regeneration system, two 295-gallon ASTs (Tank 1 & 2), piping, and associated containment area(s) will be closed in future and in accordance with 40 CFR, Part 265.111; Closure and Post Closure of Tank Systems, and Rule 62-761.800, F.A.C; Aboveground Storage Tank Systems.

This Closure Plan and the associated financial assurance for closure is prepared in accordance with the requirements of 40 CFR Part 279.54(h) - Used Oil Management; Closure, FAC 62710.800(5) - Permits for Used Oil Processing Facilities; Closure. The procedures described herein is intended to minimizes the need for further maintenance, 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 finally comply with the closure requirements of the regulations discussed above.

The Closure Plan is applicable to testing, decontamination and disposal of the LYE-1000 regeneration system, ASTs, piping, and equipment and all associated byproduct or waste. The majority of the work at the time of closure will be performed using USL personnel under the supervision of a third-party consultant. This Closure Plan addresses the shipment offsite for treatment/disposal of waste items and materials as well as decontamination of the process area and equipment. The USL facility intends to begin processing oil upon Department's approval of the permit application. Therefore, no waste or oil has been received at the facility. The Used Oil Processing Facility Closure Cost Estimate Form (DEP Form#62-710.901(7) is provided in Table 11 that also includes the closure cost estimate summary sheets for six tasks listed and discussed below:

- Task 1 - LYE-1000 Regeneration Equipment & Tanks Closure
- Task 2 - LYE-1000 Secondary Containment Area & Concrete Floor Closure
- Task 3 - Soil Investigation
- Task 4 - Groundwater Investigation
- Task 5 - Analytical Services
- Task 6 - Data Evaluation, Certification & Closure Report

The Closure Cost Estimate found in **Table 10** is based on maximum amounts for any given expenditure. For example, initial disposal and removal of material for closure will be calculated as if all three (3) tanks are completely full of material to be emptied. Other items will include the disposal of sludge byproduct removed from the equipment during processing (i.e. a maximum of the 55 gallon drum containing sludge). These items are detailed in **Table 10**.

L2 Facility Location

USL Facility is located at 7855 West 2nd Court, Bay 2, Hialeah, Florida 33012. A vicinity map is presented in **Figure 1**. A site plan depicting the location(s) of the waste treatment/storage units is presented in **Figure 2**.

L3 Permits

USL has a registered EPA FLR I.D. 000 213 777 and is designated as a Conditionally Exempt Small Quantity Generator (CESQG) that generates in any calendar month 100 kg/mo or less (220 lbs.) of non-acute hazardous waste and 1 kg (2.2 lbs.) or less of acute hazardous waste. The facility has an IW5 permit with DERM. Any waste determined to be hazardous is returned to the generator or transported to a RCRA facility. As of the date of this plan, USL has not begun operations and therefore, not generated or received any hazardous waste.

L4 Facility Contact

During closure the facility contact will be the following:

Mr. Jose L. Fernandez, Manager
U.S. Lubricants, LLC
Site address: 7855 West 2nd Court, Bay 2, Hialeah, Florida 33012
Mailing Address: P.O. Box 523212, Miami, Florida 33152
Telephone: 305 477 7338

L5 Notification of Closure

At least 60 days before initiation of closure activities, USL will notify the Department and provide a written schedule of activities to clean close the facility. USL anticipates to complete closure activities within 90 days of the notification upon which it will submit a Certification of Closure within 30 days following completion of closure activities. The closure activity is described by task below and the closure fee estimate for each activity is included in **Table 11**. USL intends to characterize all waste proposed to be received in according to its waste analyses plan discussed in Attachment G.

USL intends to perform a clean closure in accordance with the provisions of 40 CFR Part 265, Subpart G, 40 CFR Part 265, Subpart J, and FAC 62-761.800. Runoff/runon will be controlled by the existing secondary containment structures at each unit. It will be disposed of in the same manner as decontamination rinsate as described in the following tasks:

L6 Task 1 - LYE-1000 Equipment & Tanks Closure

This Closure Plan is for the cleaning and closure of the LYE-1000 regeneration system containing a 300-gallon aboveground used oil storage tank (AST), two 295-gallon double-walled horizontal ASTs, secondary containment system, associated piping, and ancillary equipment used for or involved in the transfer and processing of used and new oil at the USL facility. The LYE-1000 regeneration system will be processing used oil only from spent automotive engines for reuse to specific commercial sources. The LHE-1000 is a mobile processor situated to the west of warehouse building.

The ASTs are made of carbon steel with paint and/or epoxy coating. The piping is mostly galvanized steel with some f1exible hose piping connections. There are four 55-gallon metal drums used for chemical and solid waste (sludge) storage for disposal. The secondary containment system around the LYE-1000 is made of stainless steel bermed area, which is placed on six (6) inch thick reinforced concrete slab throughout the entire building floor area. The entire system area is in-doors, walled on all sides, and with one overhang roll-off door to the north and a small exit door to the south. The secondary containment around the LYE-1000 and the two double-walled ASTs consists of 8 gauge stainless steel welded plates encompassing an area of approximately, 22 feet long by 16 feet wide by 6-

inces high, and the interior walls and floor of the containment is sealed with oil compatible epoxy sealer. Further the existing concrete slab area is also sealed with an epoxy sealer and the roll off door bermed to prevent an accidental discharge outside the building. As part of the used oil processing, two or three 55-gallon drums containing sodium silicate and tetraethylenepentamine will be placed on spill containment pallets located along the southern wall section of the warehouse. Sludge recovered from the LHE-100 system will be placed in one 55-gallon drum on a secondary containment pallet also located in the general area discussed above and shown in **Figure 2**.

L7 Cleaning & Decontamination

This closure procedure is primarily to insure that no hazardous constituents exist in the tanks and/or ancillary pipes. The objective of the Closure Plan is to decontaminate the equipment with minimizing waste generation. Upon USL determining that all used oil processing activities are stopped, all processing equipment will be placed out of service. Clean-up will begin by evacuating all residual oil with the LYE-1000 regeneration AST, piping and the two used oil and new oil ASTs. Arrangements will be made for pickup of the used oil by approved vendors for the transfer of the material to the Department or Miami Dade DERM approved facilities for recycling. All processed material at the time of closure will be transferred to the appropriate vendor so that all aboveground storage tanks will be empty for commencement of closure activities. All byproduct and solid waste for disposal generated from processing activities will be analyzed for proper characterization as per **Table 3** and **Table 4** and arranged for pick up by the appropriate disposal facility.

All tanks, open or closed, shall be cleaned by the same procedures outlined below. The piping will be decontaminated by flushing with water and a solvent based degreasing agent compatible with the waste. The tanks will be decontaminated using a solvent based degreasing agent compatible with the waste and the steam cleaner. All waste generated during the closure activities will be pumped into a mobile tanker for storage and subsequently to be transported off-site for disposal.

L8 Equipment Decontamination

An equipment decontamination staging area will be established at a central location. All equipment used during the closure activities other than sampling equipment, (e.g., brushes, shovels, tank cleaning equipment) will be decontaminated by steam cleaning with an Alconox wash solution. All rinsate water will be contained by portable berrning and collected in the pump/vacuum tanker, and tested and disposed of as previously described in the closure procedures. A final decontamination equipment rinsate blank will be collected and tested via USEPA Method 8021 and the 8 RCRA metals. Materials used to construct the decontamination pad (e.g., plastic sheeting and lumber) will be drummed and disposed of at a permitted facility based on the results of the decontamination blank.

The test methods identified to determine the effectiveness of all decontamination procedures are consistent with the possibility of hazardous waste being introduced into the system at least once, and on the criteria for hazardous waste determination according to Chapter 62-730.030 FAC. All of the procedures for sampling and analyses will be performed in accordance with the applicable requirements specified in Test Methods for Evaluating Solid Waste-Physical/Chemical Methods SW-846.

L9 Waste Characterization & Disposal

The criteria used to determine if the tank and piping system has been properly decontaminated are that no visible residues remain in the piping rinsate or tank and an analyses of a final rinsate sample collected from the tank and piping will be analyzed for the following parameters in accordance with methods in SW 846 that are current at the time of closure:

- TRPH via FL PRO Method
- 8 RCRA Metals
- VOAs & VOHs by USEPA Method 8021
- Total Halogens
- PCBs

The decontamination criteria is based on those hazardous constituents "possibly present" in the wastes managed in the facility by USL since its inception. Should the rinsate not meet the criteria, the respective unit(s) will be further decontaminated as described above and additional samples of rinsate will be collected until the decontamination criteria is met. Equipment decontamination will be completed in a manner that to render all equipment, tanks and piping can be reused at a later date or offered for recycling. Upon completion of closure activities, a representative sample per waste stream generated during closure will be collected and analyzed for hazardous waste characteristics and for TCLP volatiles, semi-volatiles, and metals to determine if off-site disposal as a hazardous waste at a permitted facility is appropriate. All waste to be shipped off-site, as a hazardous waste, will have a waste classification code, supplied by the DEP/EPA Notification and Waste Classification Unit, and will be manifested prior to shipment.

L10 Task 2 - LYE Secondary Containment Area & Concrete Floor Closure

Both the LYE-1000 secondary containment and the building floor concrete slab area will be visually inspected before and after decontamination for evidence of cracks and spills. If cracks and spillage are identified, soil and/or groundwater sampling will be conducted as discussed in Task 3 and 4.

The secondary containment and building floor area will be decontaminated as discussed earlier using a low pressure water rinse and scrub brushing with a solvent based degreasing agent compatible with oil. Wastewater will be contained by existing curbing and collected in the mobile pump or vacuum truck using a portable pump and portable wet vacuum system. Representative samples of decontamination rinsate will be collected from the tanker and tested for hazardous waste characteristics and for TCLP volatiles, semi-volatiles and metals to determine if off-site disposal as a hazardous waste or non-hazardous waste at a permitted facility is appropriate. All waste to be shipped off-site, as a hazardous waste, will have a waste classification code, supplied by the DEP/EPA Notification and Waste Classification Unit, and will be manifested prior to shipment. Separate, final rinsate samples (minimum two samples) will be collected from the secondary containment floor area and the building floor concrete and submitted for laboratory analyses. The analytical parameters will be as those previously listed for the waste characterization. The criteria for clean closure will be that the parameter concentrations are below the cleanup levels in F.A.C. 62-777 or equivalent rule in effect at closure.

L11Task 3 - Soil Investigation

The soil investigation may be necessary to verify that clean closure of the facility has been obtained. The concrete pads underlying the LYE-1000 and the tank systems will be inspected before and after decontamination for evidence of cracks and spills. If cracks and spillage are identified, soil samples will be collected from beneath the concrete pad(s) at the location of each crack or spillage. If cracks of length greater than ten feet (10) are found, a soil sample will be collected every ten feet (10) along the crack. No soil sample will be collected within ten feet (10') of any other soil sample location.

If soil sampling becomes necessary, a licensed driller will be retained to drill a three inch (3") core through the concrete containment pad(s). This Closure Plan assumes that four soil samples will be collected from a depth of 0-12 inches using a 2-inch diameter stainless steel auger at various locations. All sampling and analyses will comply with the applicable requirements of Chapter 62-160, F.A.C. procedures specified in Test Methods for Evaluating Solid Waste - Physical/Chemical Methods, SW-846. Analytical parameters will be in accordance to the Table D for used oil, as defined in Rule 62-780.200(50), F.A.C., for identified products not listed in the Gasoline or Kerosene Analytical Groups. One background soil sample will be collected from an area of the facility not affected by facility operations and analyzed for the same parameters. The data that will be used to determine if the soil underlying the concrete pad has been contaminated by oil. The area will be deemed to be clean if the parameters are below FDEP Clean Soil Guidance Criteria as stated in FAC 62-777, except for parameters that are equal to or are lower than the natural background concentration.

Soil samples will be collected from a depth of 0 to 12 inches below land surface (bls) using a stainless steel 2-inch diameter auger bit using a hand held auger. The soil samples will be placed in glass sample containers provided by the contract laboratory. All sample containers will be labeled with the facility name, sampling location, sample identification number, and date and time of sample collection. All sample containers will be placed in plastic bags on ice in an insulated cooler. Appropriate chain-of-custody forms will be completed and sent to the analytical laboratory with the samples. All used sampling equipment will be decontaminated on site. All decontamination rinsate and any other waste generated during sampling activities will be collected and tested to determine if it is disposed of offsite at a permitted facility as a hazardous waste or a non- hazardous waste.

If results of analyses of sample collected from beneath the secondary containment area and the building floor concrete slab indicate concentrations of contaminants above background levels, a soil investigation work plan will be developed and submitted under separate cover, and a soil boring program will be implemented to determine the extent of contamination. The soil investigation work plan will include, but not limited to establishing a grid system and defining sample locations and sampling procedures. Once the extent of contamination, if any is defined, a plan for remediation of contaminated subsoil will be submitted to the Department and the Miami-Dade DERM under separate cover. Therefore this plan does not address soil remediation.

L12 Task 4 - Groundwater Investigation

If soil contamination is not found then groundwater assessment will not be conducted. Should soil contamination be found and there is evidence that the contaminated soil may have impacted the groundwater, and regulatory agencies concur with the findings, ground water investigation will be conducted in the area of soil contamination.

It is assumed in this closure plan that soil contamination is found and that limited groundwater assessment will be required during closure activities. Therefore, four groundwater monitoring wells will be required to assess for groundwater contamination, if any. Four samples will be obtained from each of four monitoring wells. One monitoring well will be placed at the point of highest soil contamination, while one monitoring well will be placed

up gradient and two monitoring wells will be placed down gradient direction. Ground water samples will be obtained from each well using approved sampling requirements of Chapter 62-160, F.A.C., Groundwater samples will be analyzed for the analytical parameters listed in Table D for used oil, as defined in Rule 62-780.200(50), F.A.C. The analytical parameters may be modified to include additional constituents under local, state or federal regulations. It should be noted that this Closure Plan does not address groundwater assessment or additional delineation beyond the findings of the four monitoring sample results required to define a contamination plume.

L13 Task 5 - Analytical

The sampling protocol for Task 5 has been addressed throughout each task discussed earlier and is not discussed further.

L14 Data Evaluation, Certification, and Closure Report

The cost estimate to complete the closure activities is estimated at $107,388.60 as presented in **Table 10**. The estimate is based on clean closure of each unit. The LYE-1000, tanks, secondary containment, and concrete pad decontamination will be performed by a professional tank cleaning service and continually monitored by a professional engineer's (P.E.) representative. The P.E., will make periodic site inspections for collecting samples and verifying the decontamination procedures. The sequence for closing the equipment and units will be determined by the P.E. Site visits will be conducted by an independent registered professional engineer or engineer's representative during the closure activities. The engineer will verify that wastes have been removed, tanks and pads have been cleaned, and samples have been collected and analyzed for the appropriate analytes. The engineer will be responsible for collecting any soil samples and evaluating/validating all analytical data. A final closure report will be prepared by the engineer's representative and certified by the P.E.

All hazardous wastes will be disposed of within 90 days after approval of the closure plan or within 90 days after receiving the final volume of hazardous waste at a permitted hazardous waste facility. The Department will be notified 60 days prior to initiating closure activities. The clean closure will be completed within 180 days of commencing work. A final report verifying that the facility has been closed in accordance with the approved closure plan will be certified by the registered Professional Engineer. Closure certification will be completed and submitted by registered mail within 30 days after completion of the closure activities.

U.S. LUBRICANTS, LLC – OWNER/OPERATOR APPROVAL

U.L. Lubricants. LLC is committed to the abiding by the Used Oil Processing Permit Application and all applicable regulatory standards for the facility located at 7855 West 2nd Court, Bay 2, Hialeah, Florida 33012. By signing below, I Jose L. Fernandez, Owner/Operator/Manager acknowledge that I have agree, have read, and understood with the above statements discussed in the Closure Plan included in Attachment M.

U.S. Lubricants, LLC

JOSE L. FERNANDEZ, OWNER

Name: Jose L. Fernandez, Owner/Operator/Manager

Signature Date: 3-31-15

ATTACHMENT M

MATERIAL SAFETY DATA SHEETS

MATERIAL SAFETY DATA SHEET

Prepared in accordance with OSHA Hazard communication Standard 29 CFR 1910.1200 Section (g)(c)(1)

Manufacturer's Name:	Environmental Specialists Inc.	**Emergency Telephone Number**
	243 East Marshall Road	***PERS (888) 633 – 8253***
	McDonald, OH 44437	**Information Telephone Number**
Date of Preparation:	December 18, 2008	***(888) 331 – 3443***

SECTION 1: PRODUCT IDENTIFICATION

Product Name: On-Spec Used Oil

Synonym: Used Oil, Used Oil Fuel, #4 Oil, Waste Oil

Product Number: UO-001

Formula: Hydrocarbon mixture

SECTION 2: COMPOSITION INFORMATION

Components	CAS Number	Weight %
Used Oils	Mixture	80 – 100%
Water	NA	0 – 20%
Diesel Fuel	68476-34-8	0 – 5%
Gasoline	6474-46-4	0 – 1%
Aromatic Hydrocarbons (solvents)	NA	0 – 1%
Chlorinated Paraffins	NA	< 0.5%
Ethylene glycol	NA	Trace

SECTION 3: HAZARDS IDENTIFICATION

Eye Contact: Not expected to cause prolonged or significant eye irritation.

Skin: Contact with the skin is not expected to cause prolonged or significant irritation or allergic skin response. This material is not expected to be harmful to internal organs if absorbed thorough the skin.

Ingestion: Not expected to be harmful if swallowed.

Inhalation: Not expected to be harmful if inhaled. Contains petroleum-based mineral oil. May cause respiratory irritation or other pulmonary effects following prolonged or repeated inhalation of oil mist at airborne levels above the recommended mineral oil mist exposure limit. Symptoms of respiratory irritation may include coughing and difficulty breathing.

Medical Conditions Aggravated: Pre-existing dermatitis may be aggravated.

SECTION 4: FIRST AID MEASURES

Eye Contact: Flush eye immediately with fresh water. Remove contact lenses if worn. Eyelids should be held away from the eyeball to ensure thorough rinsing. This material is not expected to cause prolonged or significant eye irritation. In the event irritation persists, seek medical attention.

Skin: No specific first aid measures are required. As a precaution, remove clothing and shoes if contaminated. To remove material from skin, use soap and water. Discard contaminated clothing and shoe or thoroughly clean before reuse.

Ingestion: No specific first aid measure required. Do not induce vomiting. As a precaution get medical advice.

Inhalation: No specific first aid measures are required. If exposed to excessive levels of material in the air, move the exposed person to fresh air. Get medical attention if coughing or respiratory discomfort occurs.

SECTION 5: FIRE FIGHTING MEASURES

Flammable Properties: Not classified by OSHA as flammable or combustible material.

Flash Point: Tag Closed Cup = 210 °F - 275 °F

Flammable Limits: LEL – Not Applicable UEL – Not applicable

Autoignition: No data available

Hazardous Combustion Products: Carbon dioxide, carbon monoxide, unburned hydrocarbons and oxides of sulfur, zinc and/or nitrogen.

Extinguishing Media: Use dry chemical, carbon dioxide, water fog, or foam to extinguish all fires.

Fire Fighting Instructions: This material will burn although it is not easily ignited. For fires involving this material, do not enter any enclosed or confined fire space without proper protective equipment, including self-contained breathing apparatus.

Use a smothering technique to extinguish a combustible liquid fire. Do not force water stream directly on oil fires, as this will scatter the fire. Use a water fog to cool fire-exposed containers, structures, and to protect personnel.

MATERIAL SAFETY DATA SHEET

Prepared in accordance with OSHA Hazard communication Standard 29 CFR 1910.1200 Section (g)(c)(1)

SECTION 6: ACCIDENTIAL RELEASE MEASURES

Protective Measures: Eliminate all source of ignition in vicinity of spilled material.

Spill Management: Stop the source of the release if it can be done without risk. Contain release to prevent further contamination of soil, surface water or groundwater. DO NOT flush down public sewers or other drainage systems. Place contaminated materials in appropriate containers and dispose of in accordance with local, state, and federal regulations. Store in a cool, dry, well-ventilated area away from heat, sources of ignition and incompatibles.

Spill Reporting: The Clean Water Act requires the reporting of any discharge of oil or petroleum (in any form) into surface waters. **Immediately** call the national Emergency Response Center at 1-800-424-8802.

SECTION 7: HANDLING AND STORAGE

Handling: To avoid contamination of product keep containers closed when not in use. Empty containers retain product residues (solid, liquid, and/or vapor) that can be dangerous. Do not pressurize, cut, weld, braze, solder, drill, grind or expose containers to flames, sparks, heat or other potential ignitions sources. Empty containers should be completely drained, properly closed, and promptly returned to drum reconditioner or disposed of properly.

Storage: Keep containers closed when not in use. Store in a cool, dry well-ventilated area. Do not store with strong oxidizing agents. Keep away from open flames and high temperatures.

SECTION 8: EXPOSURE CONTROLS AND PERSONAL PROTECTION

Engineering Controls: Use in a well-ventilated area. Provide exhaust ventilation or other engineering controls to keep the airborne concentrations of mists and/or vapors below the recommended exposure limits (see below). Have an eye wash station readily available where eye contact can occur.

Personal Protective Equipment: Personal protective equipment (PPE) selections vary based on the potential exposure conditions such as handling practices, concentration and ventilation. At a minimum safety glasses and skin protection should be worn. Additional PPE may be required based on specific working conditions.

Eye Protection:  Safety glasses equipped with side shields are recommended for minimal protection. Wear goggles if splashing or spraying for added protection in the event splashing or spraying is expected.

Hand Protection:  Incidental contact with oil does not require hand protection. If frequent or prolonged exposure is expected chemical resistant gloves should be worn. Gloves should be nitrile, neoprene, or vinyl.

Skin Protection: 

Uniforms or coveralls should provide adequate protection under normal working conditions. If prolonged contact is unavoidable, wear protective clothing made of polyvinyl alcohol (PVA), polyvinyl chloride (PVC), neoprene, or nitrile. Remove oil contaminated clothing and launder before reuse. Heavily contaminate clothing and leather goods should be removed promptly and cleaned or discarded.

Respiratory Protection: 

Under normal use, respiratory protection is not required. If the engineering controls do not maintain airborne concentrations at a level which is adequate to protect the health of the employee, a NIOSH-approved organic vapor respirator equipped with a dust/mist prefilter should be worn. Respirator selection, use, and maintenance should be in accordance with the requirements of the OSHA Respiratory Protection Standard, 29 CFR 1910.134.

Occupational Exposure Guidelines:

Substance	Applicable Workplace Exposure Levels	
	ACGIH	OSHA
Oil Mist, Mineral	TWA: 5 mg/m^3 STEL: 10 mg/m^3	TWA: 5 mg/m^3
Diesel Fuel Mist	TWA: 5 mg/m^3 STEL: 10 mg/m^3	TWA: 5 mg/m^3
Gasoline	TWA: 300 ppm STEL: NE	NE

NE = Not Established

SECTION 9: PHYSICAL AND CHEMICAL PROPERTIES

Color:	Light brown to black	**Physical State:**	Liquid
Odor:	Mild petroleum hydrocarbon	**Vapor Pressure:**	<0. 1 mmHg @ 68 °F
pH:	NA	**Vapor Density**	>1.0 (H_2O = 1)
Boiling Point:	180 – 220 °F	**Solubility:**	Insoluble in water
Freezing Point:	NA	**Specific Gravity:**	0.85 – 0.88 (H_2O = 1)

SECTION 10: STABILITY AND REACTIVITY

Chemical Stability: Stable

Hazardous Polymerization: Not expected to occur.

Conditions to Avoid: Keep away form extreme heat, sparks, open flames, and strong oxidizers.

Incompatibility with Other Materials:	May react with strong acids or strong oxidizing agents such as chlorates, nitrates, peroxides, etc.
Hazardous Decomposition Products:	No additional hazardous decomposition products other than those identified in Section 5 of this MSDS.

SECTION 11: TOXICOLOGICAL INFORMATION

Acute Symptoms of Exposure:

Inhalation:	High concentrations of aerosol or mist may be generated at high temperatures and may be irritating to the respiratory tract, including nose and throat, and may cause difficulty breathing. This may be particularly true with people who have a high level of sensitivity and allergic reactions.
Ingestion:	May cause mild irritation of the digestive tract, including cramping, diarrhea, nausea, and vomiting. Aspiration into the lungs – by initial ingestion or vomiting – may cause mild to severe pulmonary injury.
Skin:	Prolongs and/or repeated exposure may cause mil skin irritation, including redness, burning, temporary drying/cracking, and acute dermatitis. Contact with hot material may cause burns.
Eyes:	Contact may cause slight to moderate irritation, including burning, redness, and tearing. Contact with hot oil may cause thermal burns.

Chronic Symptoms of Exposure:

Inhalation:	Exposure to high levels of oil mist concentration may lead to chronic pulmonary conditions such as chronic bronchitis, pneumonia, and emphysema.
Skin:	Cracking, drying, and chronic dermatitis.

SECTION 12: ECOLOGICAL INFORMATION

This material may be harmful to human, animal, and aquatic life is spilled on soil or in water. Petroleum products can be harmful or fatal to aquatic life and waterfowl. Oil is persistent and does not readily biodegrade.

SECTION 13: DISPOSAL CONSIDERATIONS

Disposal of collected material must comply with federal, state and local regulations. The material, if spilled or discarded may be a regulated waste. Refer to federal, state and local regulations for regulated waste transport and disposal. The responsibility for proper waste disposal lies with the owner of the waste. Contact your ESI representative regarding proper recycling or disposal.

MATERIAL SAFETY DATA SHEET

Prepared in accordance with OSHA Hazard communication Standard 29 CFR 1910.1200 Section (g)(c)(1)

SECTION 14: TRANSPORTATION INFORMATION

This material is not regulated by the US DOT and therefore not subject to the regulations in 49 CFR Parts 171 – 180. This product is oil and regulated under 49 CFR 130. If shipped by rail or highway in a tank with a capacity of 3500 gallons or more. it is subject to these requirements. Mixtures or solutions containing 10% or more of this product may also be subject to this rule.

SECTION 15: REGULATORY INFORMATION

TSCA Inventory

Components of this material are listed on the Toxic Substances Control Act Inventory.

SARA 302/304 Emergency Planning and Notification

The Superfund Amendments and Reauthorization Act of 1986 (SARA) Title III requires facilities subject to Subparts 302 and 304 to submit emergency planning and notification information based on Threshold Planning Quantities (TPQs) and Reportable Quantities (RQs) for "Extremely Hazardous Substances" listed in 40 CFR 302.4 and 40 CFR 355.

There are no components in this product on the SARA 302 list.

SARA 311/312 Hazard Identification

The Superfund Amendments and Reauthorization Act of 1986 (SARA) Title III requires facilities subject to Subparts 311 and 312 to submit aggregate information on chemical by "Hazard Category" as defined in 40 CFR 370.2. This material would be classified under the following hazard categories:

Immediate Acute Health Effects:	No
Delayed (Chronic) Health Effects:	Yes
Fire Hazard:	Yes
Sudden Release of Pressure Hazard:	No
Reactivity Hazard:	No

SARA 313 Toxic Chemical Notification and Release Reporting

This product contains no SARA 313 reportable chemicals.

CERCLA

The Comprehensive Environmental Response, Compensation, and Liability Act of 1980 (CERCLA) requires notification of the National Response Center concerning release of quantities of "hazardous substances" equal to or greater than the reportable quantities (RQs) including petroleum, including crude oil or any fraction thereof which is not otherwise specifically designated in 40 CFR 302.4. Chemical substances that may present in this product are subject to CERCLA, these include the components of gasoline (benzene, toluene, xylene, ethylbenzene, and 1,2,4-trimethylbenzene. The concentration of each regulated material is expected to be <1%. Zinc and zinc compounds may also be present in concentrations <0.1%.

MATERIAL SAFETY DATA SHEET

Prepared in accordance with OSHA Hazard communication
Standard 29 CFR 1910.1200 Section (g)(c)(1)

SECTION 16: OTHER INFORMATION

NFPA Ratings:		Health:	0	Flammability:	1	Reactivity:	0
HMIS Ratings:		Health:	1	Flammability:	1	Reactivity:	0

0 – Least, 1 – Slight, 2 – Moderate, 3 – High, 4 – Extreme

These values are obtained using the guidelines or published evaluations by the National Fire Protection Association (NFPA) of the National Paint and Coating Association (for HMIS ratings).

LABEL RECOMMENDATION: ON-SPEC USED OIL

NOTICE: The information herein is based on data considered to be accurate at date of preparation. No warranty is made as to the accuracy or completeness of the foregoing data and safety information. No responsibility can be assumed by vendor for any damage or injury resulting from abnormal use or from any failure to adhere to recommended practices, or from any hazards inherent in the nature of the product.

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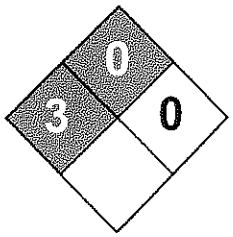

Health	3
Fire	0
Reactivity	0
Personal Protection	

Material Safety Data Sheet
Sodium Silicate, 40 Be' MSDS

Section 1: Chemical Product and Company Identification

Product Name: Sodium Silicate, 40 Be'

Catalog Codes: SLS2599

CAS#: Mixture.

RTECS: Not applicable.

TSCA: TSCA 8(b) inventory: Sodium silicate; Water

CI#: Not applicable.

Synonym:

Chemical Name: Not applicable.

Chemical Formula: Not applicable.

Contact Information:

Sciencelab.com, Inc.
14025 Smith Rd.
Houston, Texas 77396

US Sales: **1-800-901-7247**
International Sales: **1-281-441-4400**

Order Online: ScienceLab.com

CHEMTREC (24HR Emergency Telephone), call:
1-800-424-9300

International CHEMTREC, call: 1-703-527-3887

For non-emergency assistance, call: 1-281-441-4400

Section 2: Composition and Information on Ingredients

Composition:

Name	CAS #	% by Weight
Sodium silicate	1344-09-8	40
Water	7732-18-5	60

Toxicological Data on Ingredients: Sodium silicate LD50: Not available. LC50: Not available.

Section 3: Hazards Identification

Potential Acute Health Effects:
Extremely hazardous in case of skin contact (corrosive, irritant), of eye contact (irritant), of ingestion, of inhalation. Liquid or spray mist may produce tissue damage particularly on mucous membranes of eyes, mouth and respiratory tract. Skin contact may produce burns. Inhalation of the spray mist may produce severe irritation of respiratory tract, characterized by coughing, choking, or shortness of breath. Inflammation of the eye is characterized by redness, watering, and itching. Skin inflammation is characterized by itching, scaling, reddening, or, occasionally, blistering.

Potential Chronic Health Effects:
Extremely hazardous in case of skin contact (corrosive, irritant), of eye contact (irritant), of ingestion, of inhalation. Non-sensitizer for skin. Non-permeator by skin. CARCINOGENIC EFFECTS: Not available. MUTAGENIC EFFECTS: Not available. TERATOGENIC EFFECTS: Not available. DEVELOPMENTAL TOXICITY: Not available. Repeated or prolonged contact with spray mist may produce chronic eye irritation and severe skin irritation. Repeated or prolonged exposure to spray mist may produce respiratory tract irritation leading to frequent attacks of bronchial infection. Repeated or prolonged inhalation of vapors may lead to chronic respiratory irritation.

Section 4: First Aid Measures

Eye Contact:
Check for and remove any contact lenses. Immediately flush eyes with running water for at least 15 minutes, keeping eyelids open. Cold water may be used. Do not use an eye ointment. Seek medical attention.

Skin Contact:
If the chemical got onto the clothed portion of the body, remove the contaminated clothes as quickly as possible, protecting your own hands and body. Place the victim under a deluge shower. If the chemical got on the victim's exposed skin, such as the hands : Gently and thoroughly wash the contaminated skin with running water and non-abrasive soap. Be particularly careful to clean folds, crevices, creases and groin. Cold water may be used. If irritation persists, seek medical attention. Wash contaminated clothing before reusing.

Serious Skin Contact:
Wash with a disinfectant soap and cover the contaminated skin with an anti-bacterial cream. Seek medical attention.

Inhalation: Allow the victim to rest in a well ventilated area. Seek immediate medical attention.

Serious Inhalation: Not available.

Ingestion:
Do not induce vomiting. Loosen tight clothing such as a collar, tie, belt or waistband. If the victim is not breathing, perform mouth-to-mouth resuscitation. Seek immediate medical attention.

Serious Ingestion: Not available.

Section 5: Fire and Explosion Data

Flammability of the Product: Non-flammable.

Auto-Ignition Temperature: Not applicable.

Flash Points: Not applicable.

Flammable Limits: Not applicable.

Products of Combustion: Not available.

Fire Hazards in Presence of Various Substances: Not applicable.

Explosion Hazards in Presence of Various Substances:
Risks of explosion of the product in presence of mechanical impact: Not available. Risks of explosion of the product in presence of static discharge: Not available.

Fire Fighting Media and Instructions: Not applicable.

Special Remarks on Fire Hazards: Not available.

Special Remarks on Explosion Hazards: Not available.

Section 6: Accidental Release Measures

Small Spill:
Dilute with water and mop up, or absorb with an inert dry material and place in an appropriate waste disposal container. If necessary: Neutralize the residue with a dilute solution of acetic acid. Finish cleaning by spreading water on the contaminated surface and dispose of according to local and regional authority requirements.

Large Spill:
Corrosive liquid. Stop leak if without risk. Absorb with DRY earth, sand or other non-combustible material. Do not get water inside container. Do not touch spilled material. Use water spray curtain to divert vapor drift. Prevent entry into sewers, basements or confined areas; dike if needed. Call for assistance on disposal. Neutralize the residue with a dilute solution of acetic acid. Finish cleaning by spreading water on the contaminated surface and allow to evacuate through the sanitary system.

Section 7: Handling and Storage

Precautions:
Keep container dry. Do not breathe gas/fumes/ vapour/spray. Never add water to this product In case of insufficient ventilation, wear suitable respiratory equipment If you feel unwell, seek medical attention and show the label when possible. Avoid contact with skin and eyes Keep away from incompatibles such as oxidizing agents, acids.

Storage: Corrosive materials should be stored in a separate safety storage cabinet or room.

Section 8: Exposure Controls/Personal Protection

Engineering Controls:
Provide exhaust ventilation or other engineering controls to keep the airborne concentrations of vapors below their respective threshold limit value.

Personal Protection:
Face shield. Full suit. Vapor respirator. Be sure to use an approved/certified respirator or equivalent. Gloves. Boots.

Personal Protection in Case of a Large Spill:
Splash goggles. Full suit. Vapor respirator. Boots. Gloves. A self contained breathing apparatus should be used to avoid inhalation of the product. Suggested protective clothing might not be sufficient; consult a specialist BEFORE handling this product.

Exposure Limits: Not available.

Section 9: Physical and Chemical Properties

Physical state and appearance: Liquid. (Oily liquid.)

Odor: Odorless.

Taste: Not available.

Molecular Weight: Not applicable.

Color: Clear Colorless.

pH (1% soln/water): Basic.

Boiling Point: The lowest known value is 100°C (212°F) (Water).

Melting Point: Not available.

Critical Temperature: Not available.

Specific Gravity: Weighted average: 1.15 (Water = 1)

Vapor Pressure: The highest known value is 17.535 mm of Hg (@ 20°C) (Water).

Vapor Density: The highest known value is 0.62 (Air = 1) (Water).

Volatility: Not available.

Odor Threshold: Not available.

Water/Oil Dist. Coeff.: Not available.

Ionicity (in Water): Not available.

Dispersion Properties: See solubility in water, methanol, diethyl ether.

Solubility:
Easily soluble in cold water, hot water. Partially soluble in methanol, diethyl ether.

Section 10: Stability and Reactivity Data

Stability: The product is stable.

Instability Temperature: Not available.

Conditions of Instability: Not available.

Incompatibility with various substances:
Highly reactive with acids. Reactive with oxidizing agents.

Corrosivity:
Slightly corrosive to corrosive in presence of steel, of aluminum, of zinc, of copper. Non-corrosive in presence of glass.

Special Remarks on Reactivity: Not available.

Special Remarks on Corrosivity: Not available.

Polymerization: No.

Section 11: Toxicological Information

Routes of Entry: Eye contact. Inhalation. Ingestion.

Toxicity to Animals:
LD50: Not available. LC50: Not available.

Chronic Effects on Humans: Not available.

Other Toxic Effects on Humans: Extremely hazardous in case of skin contact (corrosive, irritant), of ingestion, of inhalation.

Special Remarks on Toxicity to Animals: Not available.

Special Remarks on Chronic Effects on Humans: Not available.

Special Remarks on other Toxic Effects on Humans: Not available.

Section 12: Ecological Information

Ecotoxicity: Not available.

BOD5 and COD: Not available.

Products of Biodegradation:
Possibly hazardous short term degradation products are not likely. However, long term degradation products may arise.

Toxicity of the Products of Biodegradation: The products of degradation are as toxic as the original product.

Special Remarks on the Products of Biodegradation: Not available.

Section 13: Disposal Considerations

Waste Disposal:

Section 14: Transport Information

DOT Classification: Not a DOT controlled material (United States).

Identification: Not applicable.

Special Provisions for Transport: Not applicable.

Section 15: Other Regulatory Information

Federal and State Regulations: TSCA 8(b) inventory: Sodium silicate; Water

Other Regulations: OSHA: Hazardous by definition of Hazard Communication Standard (29 CFR 1910.1200).

Other Classifications:

WHMIS (Canada): CLASS D-2B: Material causing other toxic effects (TOXIC).

DSCL (EEC): R35- Causes severe burns.

HMIS (U.S.A.):

Health Hazard: 3

Fire Hazard: 0

Reactivity: 0

Personal Protection:

National Fire Protection Association (U.S.A.):

Health: 3

Flammability: 0

Reactivity: 0

Specific hazard:

Protective Equipment:
Gloves. Full suit. Vapor respirator. Be sure to use an approved/certified respirator or equivalent. Wear appropriate respirator when ventilation is inadequate. Face shield.

Section 16: Other Information

References: Not available.

Other Special Considerations: Not available.

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Last Updated: 05/21/2013 12:00 PM

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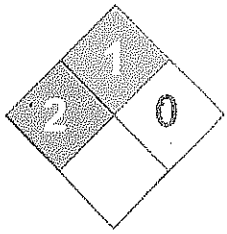

Health	2
Fire	0
Reactivity	0
Personal Protection	

Material Safety Data Sheet
Tetraethylenepentamine MSDS

Section 1: Chemical Product and Company Identification

Product Name: Tetraethylenepentamine

Catalog Codes: SLT3595

CAS#: 112-57-2

RTECS: KH8585000

TSCA: TSCA 8(b) inventory: Tetraethylenepentamine

CI#: Not available.

Synonym: 1,4,7,10,13-Pentaazatridecane; DEH 26; Tetren; Tetraethylpentylamine

Chemical Name: 1,2-Ethanediamine, N-(2-aminoethyl)-N'-(2-((2-aminoethyl)amin)ethyl)-

Chemical Formula: C8-H23-N5

Contact Information:

Sciencelab.com, Inc.
14025 Smith Rd.
Houston, Texas 77396

US Sales: 1-800-901-7247
International Sales: 1-281-441-4400

Order Online: ScienceLab.com

CHEMTREC (24HR Emergency Telephone), call: 1-800-424-9300

International CHEMTREC, call: 1-703-527-3887

For non-emergency assistance, call: 1-281-441-4400

Section 2: Composition and Information on Ingredients

Composition:

Name	CAS #	% by Weight
Tetraethylenepentamine	112-57-2	100

Toxicological Data on Ingredients: Tetraethylenepentamine: ORAL (LD50): Acute: 3990 mg/kg [Rat]. DERMAL (LD50): Acute: 0.66 mg/kg [Rabbit].

Section 3: Hazards Identification

Potential Acute Health Effects:
Very hazardous in case of skin contact (irritant), of ingestion, of inhalation. Hazardous in case of skin contact (corrosive, sensitizer, permeator), of eye contact (irritant, corrosive). Liquid or spray mist may produce tissue damage particularly on mucous membranes of eyes, mouth and respiratory tract. Skin contact may produce burns. Inhalation of the spray mist may produce severe irritation of respiratory tract, characterized by coughing, choking, or shortness of breath.

Potential Chronic Health Effects:
Slightly hazardous in case of skin contact (sensitizer), of inhalation (sensitizer) CARCINOGENIC EFFECTS: Not available. MUTAGENIC EFFECTS: Mutagenic for bacteria and/or yeast. TERATOGENIC EFFECTS: Not available. DEVELOPMENTAL TOXICITY: Not available. Repeated or prolonged contact with spray mist may produce chronic eye irritation and severe skin irritation. Repeated or prolonged exposure to spray mist may produce respiratory tract irritation leading to frequent attacks of bronchial infection.

Section 4: First Aid Measures

Eye Contact:
Check for and remove any contact lenses. In case of contact, immediately flush eyes with plenty of water for at least 15 minutes. Cold water may be used. Get medical attention immediately.

Skin Contact:
In case of contact, immediately flush skin with plenty of water for at least 15 minutes while removing contaminated clothing and shoes. Cover the irritated skin with an emollient. Cold water may be used.Wash clothing before reuse. Thoroughly clean shoes before reuse. Get medical attention immediately.

Serious Skin Contact:
Wash with a disinfectant soap and cover the contaminated skin with an anti-bacterial cream. Seek immediate medical attention.

Inhalation:
If inhaled, remove to fresh air. If not breathing, give artificial respiration. If breathing is difficult, give oxygen. Get medical attention immediately.

Serious Inhalation:
Evacuate the victim to a safe area as soon as possible. Loosen tight clothing such as a collar, tie, belt or waistband. If breathing is difficult, administer oxygen. If the victim is not breathing, perform mouth-to-mouth resuscitation. WARNING: It may be hazardous to the person providing aid to give mouth-to-mouth resuscitation when the inhaled material is toxic, infectious or corrosive. Seek immediate medical attention.

Ingestion:
Do NOT induce vomiting unless directed to do so by medical personnel. Never give anything by mouth to an unconscious person. If large quantities of this material are swallowed, call a physician immediately. Loosen tight clothing such as a collar, tie, belt or waistband.

Serious Ingestion: Not available.

Section 5: Fire and Explosion Data

Flammability of the Product: May be combustible at high temperature.

Auto-Ignition Temperature: Not available.

Flash Points: Not available.

Flammable Limits: Not available.

Products of Combustion: These products are carbon oxides (CO, CO2), nitrogen oxides (NO, NO2...).

Fire Hazards in Presence of Various Substances:
Slightly flammable to flammable in presence of heat. Non-flammable in presence of open flames and sparks, of shocks.

Explosion Hazards in Presence of Various Substances:
Risks of explosion of the product in presence of mechanical impact: Not available. Risks of explosion of the product in presence of static discharge: Not available Slightly explosive in presence of heat.

Fire Fighting Media and Instructions:
SMALL FIRE: Use DRY chemical powder. LARGE FIRE: Use water spray, fog or foam. Do not use water jet

Special Remarks on Fire Hazards: Combustible. It may burn, but it does not ignite readily.

Special Remarks on Explosion Hazards:
When heated, vapors may form explosive mixtures with air. Some may polymerize explosively when heated or involved in a fire

Section 6: Accidental Release Measures

Small Spill:
Dilute with water and mop up, or absorb with an inert dry material and place in an appropriate waste disposal container.

Large Spill:
Corrosive liquid. Stop leak if without risk. Absorb with DRY earth, sand or other non-combustible material. Do not get water inside container. Do not touch spilled material. Use water spray curtain to divert vapor drift. Prevent entry into sewers, basements or confined areas; dike if needed. Eliminate all ignition sources. Call for assistance on disposal.

Section 7: Handling and Storage

Precautions:
Keep locked up.. Keep container dry. Keep away from heat. Keep away from sources of ignition. Empty containers pose a fire risk, evaporate the residue under a fume hood. Ground all equipment containing material. Do not ingest. Do not breathe gas/ fumes/ vapor/spray. Never add water to this product. In case of insufficient ventilation, wear suitable respiratory equipment. If ingested, seek medical advice immediately and show the container or the label. Avoid contact with skin and eyes. Keep away from incompatibles such as oxidizing agents, metals.

Storage: Keep container tightly closed. Keep container in a cool, well-ventilated area.

Section 8: Exposure Controls/Personal Protection

Engineering Controls:
Provide exhaust ventilation or other engineering controls to keep the airborne concentrations of vapors below their respective threshold limit value. Ensure that eyewash stations and safety showers are proximal to the work-station location.

Personal Protection:
Face shield. Full suit. Vapor respirator. Be sure to use an approved/certified respirator or equivalent. Gloves. Boots.

Personal Protection in Case of a Large Spill:
Splash goggles. Full suit. Vapor respirator. Boots. Gloves. A self contained breathing apparatus should be used to avoid inhalation of the product. Suggested protective clothing might not be sufficient; consult a specialist BEFORE handling this product.

Exposure Limits: Not available.

Section 9: Physical and Chemical Properties

Physical state and appearance: Liquid. (Viscous liquid.)

Odor: Ammoniacal. Disagreeable. Penetrating

Taste: Not available.

Molecular Weight: 189.31 g/mole

Color: Not available.

pH (1% soln/water): Not available.

Boiling Point: 340.3°C (644.5°F)

Melting Point: -30°C (-22°F)

Critical Temperature: Not available.

Specific Gravity: 0.998 (Water = 1)

Vapor Pressure: Not available.

Vapor Density: 6.53 (Air = 1)

Volatility: Not available.

Odor Threshold: Not available.

Water/Oil Dist. Coeff.: The product is more soluble in oil; log(oil/water) = 1.5

Ionicity (in Water): Not available.

Dispersion Properties: See solubility in water.

Solubility:
Soluble in cold water, hot water. Soluble in most organic solvents

Section 10: Stability and Reactivity Data

Stability: The product is stable.

Instability Temperature: Not available.

Conditions of Instability: Incompatible materials, excess heat, moisture

Incompatibility with various substances: Reactive with oxidizing agents, metals.

Corrosivity: Not available.

Special Remarks on Reactivity:
Contact with metals may evolve flammable hydrogen gas. Hygroscopic: keep container tightly closed.

Special Remarks on Corrosivity: Not available.

Polymerization: Will not occur.

Section 11: Toxicological Information

Routes of Entry: Absorbed through skin. Dermal contact. Eye contact. Inhalation. Ingestion.

Toxicity to Animals: Acute oral toxicity (LD50): 3990 mg/kg [Rat].

Chronic Effects on Humans: MUTAGENIC EFFECTS: Mutagenic for bacteria and/or yeast.

Other Toxic Effects on Humans:
Very hazardous in case of skin contact (irritant), of ingestion. . Hazardous in case of skin contact (corrosive, sensitizer, permeator), of eye contact (corrosive), of inhalation (lung corrosive).

Special Remarks on Toxicity to Animals: LD50 [Rabbit] - Route - Skin; Dose: 660 ul/kg

Special Remarks on Chronic Effects on Humans: May affect genetic material (mutagenic)

Special Remarks on other Toxic Effects on Humans:
Acute Potential Health Effects: Skin: Causes severe skin irriation and causes skin burns. It can be absorbed through the skin. Harmful if absorbed through skin! Eyes: Causes eye irritation and burn. May cause corneal injury which may result in permanent impairment of vision, even blindness Inhalation: Causes respiratory tract irritation and chemical burns. Ingestion: Causes digestive tract irritation and burns. May cause severe and permanent damage to the digestive tract. Chronic Potential Health Effects: Skin: Prolonged or repeated skin contact may cause allergic skin reation. Inhalation: Prolonged or repeated inhalation may cause allergic respiratory reaction.

Section 12: Ecological Information

Ecotoxicity: Not available.

BOD5 and COD: Not available.

Products of Biodegradation:

Possibly hazardous short term degradation products are not likely. However, long term degradation products may arise.

Toxicity of the Products of Biodegradation: The products of degradation are less toxic than the product itself.

Special Remarks on the Products of Biodegradation: Not available.

Section 13: Disposal Considerations

Waste Disposal:
Waste must be disposed of in accordance with federal, state and local environmental control regulations.

Section 14: Transport Information

DOT Classification: Class 8: Corrosive material

Identification: Tetraethylenepentamine UNNA: 2320 PG: III

Special Provisions for Transport: Not available.

Section 15: Other Regulatory Information

Federal and State Regulations:
Pennsylvania RTK: Tetraethylenepentamine Massachusetts RTK: Tetraethylenepentamine New Jersey: Tetraethylenepentamine TSCA 8(b) inventory: Tetraethylenepentamine

Other Regulations:
OSHA: Hazardous by definition of Hazard Communication Standard (29 CFR 1910.1200). EINECS: This product is on the European Inventory of Existing Commercial Chemical Substances.

Other Classifications:

WHMIS (Canada):
CLASS D-1B: Material causing immediate and serious toxic effects (TOXIC). CLASS E: Corrosive liquid.

DSCL (EEC):
R21/22- Harmful in contact with skin and if swallowed. R34- Causes burns. R43- May cause sensitization by skin contact. R51/53- Toxic to aquatic organisms, may cause long-term adverse effects in the aquatic environment. S26- In case of contact with eyes, rinse immediately with plenty of water and seek medical advice. S36/37/39- Wear suitable protective clothing, gloves and eye/face protection. S45- In case of accident or if you feel unwell, seek medical advice immediately (show the label where possible). S61- Avoid release to the environment. Refer to special instructions/Safety data sheets.

HMIS (U.S.A.):

Health Hazard: 3

Fire Hazard: 0

Reactivity: 0

Personal Protection:

National Fire Protection Association (U.S.A.):

Health: 2

Flammability: 1

Reactivity: 0

Specific hazard:

Protective Equipment:

Gloves. Full suit. Vapor respirator. Be sure to use an approved/certified respirator or equivalent. Wear appropriate respirator when ventilation is inadequate. Face shield.

Section 16: Other Information

References: Not available.

Other Special Considerations: Not available.

Created: 10/10/2005 12:02 AM

Last Updated: 05/21/2013 12:00 PM

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MATERIAL SAFETY DATA SHEET

AMERICAN COLLOID COMPANY

1. Product and Company Identification

Material name	**VOLCLAY® SPV**
Version #	18
Revision date	22-June-2011
CAS #	1302-78-9
Synonym(s)	SMECTITE CLAY
Manufacturer information	American Colloid Company Industrial Specialties Group 2870 Forbs Avenue Hoffman Estates, IL 60192 US safetydata@amcol.com http://www.colloid.com/ISG/ General Information (800) 426-5564 CHEMTREC® (800) 424-9300

2. Hazards Identification

Emergency overview	Material can be slippery when wet
Potential health effects	
Routes of exposure	Inhalation. Eye contact.
Eyes	Dust or powder may irritate eye tissue.
Skin	Non-irritating to the skin.
Inhalation	Repeated or prolonged inhalation may cause toxic effects. For additional information on inhalation hazards, see Section 11 of this safety data sheet.
Ingestion	No significant adverse effects are expected upon ingestion of the product.
Target organs	Lungs.
Chronic effects	This product has the potential for generation of respirable dust during handling and use. Dust may contain respirable crystalline silica. Overexposure to dust may result in pneumocononiosis, a respiratory disease caused by inhalation of mineral dust, which can lead to fibrotic changes to the lung tissue, or silicosis, a respiratory disease caused by inhalation of silica dust, which can lead to inflammation and fibrosis of the lung tissue. Occupational exposure to nuisance dust (total and respirable) and respirable crystalline silica should be monitored and controlled.

3. Composition / Information on Ingredients

The manufacturer lists no ingredients as hazardous according to OSHA 29 CFR 1910.1200.

Constituents	CAS #	Percent
QUARTZ	14808-60-7	

Composition comments This product contains trace levels (<0.1%) of a potential carcinogen. Occupational Exposure Limits for constituents are listed in Section 8.

4. First Aid Measures

First aid procedures

Eye contact	Flush eyes immediately with large amounts of water. Get medical attention if irritation develops or persists.
Skin contact	No special measures required. Get medical attention if irritation develops or persists.
Inhalation	If symptoms are experienced, remove source of contamination or move victim to fresh air. If the affected person is not breathing, apply artificial respiration. If breathing is difficult, give oxygen. Call a physician if symptoms develop or persist.
Ingestion	No special measures required. If ingestion of a large amount does occur, seek medical attention.
Notes to physician	Provide general supportive measures and treat symptomatically.

5. Fire Fighting Measures

Flammable properties The product is not flammable. This material will not burn.

Extinguishing media

Suitable extinguishing media	Use any media suitable for the surrounding fires. Dry chemical, CO2, water spray or regular foam.

Protection of firefighters

Protective equipment and precautions for firefighters	As in any fire, wear self-contained breathing apparatus pressure-demand, MSHA/NIOSH (approved or equivalent) and full protective gear.
Fire fighting equipment/instructions	Material can be slippery when wet.
Hazardous combustion products	None known.

6. Accidental Release Measures

Personal precautions	Material can be slippery when wet. Forms smooth, slippery surfaces on floors, posing an accident risk. Wear a dust mask if dust is generated above exposure limits.
Environmental precautions	No special environmental precautions required.
Methods for containment	None necessary.
Methods for cleaning up	Avoid the generation of dusts during clean-up. Collect dust or particulates using a vacuum cleaner with a HEPA filter. Reduce airborne dust and prevent scattering by moistening with water.

7. Handling and Storage

Handling	Keep formation of airborne dusts to a minimum. Provide appropriate exhaust ventilation at places where dust is formed. In case of insufficient ventilation, wear suitable respiratory equipment.
Storage	Guard against dust accumulation of this material. No special storage conditions required. No special restrictions on storage with other products.

8. Exposure Controls / Personal Protection

Occupational exposure limits

US. ACGIH Threshold Limit Values

Constituents	Type	Value	Form
INERT OR NUISANCE DUSTS (SEQ250)	TWA	10.0000 mg/m3	Inhalable particles.
		3.0000 mg/m3	Respirable particles.
QUARTZ (14808-60-7)	TWA	0.0250 mg/m3	Respirable fraction.

US. OSHA Table Z-1 Limits for Air Contaminants (29 CFR 1910.1000)

Constituents	Type	Value	Form
INERT OR NUISANCE DUSTS (SEQ250)	PEL	15.0000 mg/m3	Total dust.
		5.0000 mg/m3	Respirable fraction.
	TWA	5.0000 mg/m3	Respirable fraction.
		15.0000 mg/m3	Total dust.
		50.0000 mppcf	Total dust.
		15.0000 mppcf	Respirable fraction.
QUARTZ (14808-60-7)	TWA	0.3000 mg/m3	Total dust.
		2.4000 mppcf	Respirable.
		0.1000 mg/m3	Respirable.

Exposure guidelines	Occupational exposure to nuisance dust (total and respirable) and respirable crystalline silica should be monitored and controlled.
Engineering controls	If material is ground, cut, or used in any operation which may generate dusts, use appropriate local exhaust ventilation to keep exposures below the recommended exposure limits. If engineering measures are not sufficient to maintain concentrations of dust particulates below the OEL, suitable respiratory protection must be worn.

Personal protective equipment

Eye / face protection	Wear dust goggles.
Skin protection	No special protective equipment required.
Respiratory protection	Use a particulate filter respirator for particulate concentrations exceeding the Occupational Exposure Limit.
General hygiene considerations	Eye wash fountain is recommended. Use good industrial hygiene practices in handling this material.

9. Physical & Chemical Properties

Appearance	Not available.
Physical state	Solid.
Form	Granular. Pellets. Powder. Chips.
Color	Various.
Odor	None.
Odor threshold	Not available.
pH	9 In presence of water, forms translucent suspension with pH approx. 9.0
Vapor pressure	3.6e-006 kPa at 25°C
Vapor density	Not available.
Boiling point	Not available.
Melting point/Freezing point	Not available.
Solubility (water)	Negligible
Specific gravity	Not available.
Relative density	Not available.
Flash point	Not flammable
Flammability limits in air, upper, % by volume	Not explosive
Flammability limits in air, lower, % by volume	Not explosive
Auto-ignition temperature	Not available.
VOC	0 % estimated
Percent volatile	0 % estimated
Molecular formula	UNKNOWN

10. Chemical Stability & Reactivity Information

Chemical stability	Stable at normal conditions.
Conditions to avoid	None known.
Incompatible materials	None known.
Hazardous decomposition products	None known.
Possibility of hazardous reactions	Will not occur.

11. Toxicological Information

Toxicological data

Constituents	Test Results
QUARTZ (14808-60-7)	Acute Oral LD50 Rat: 500 mg/kg

Acute effects Mild irritant to eyes (according to the modified Kay & Calandra criteria).

Chronic effects

In 1997, IARC (the International Agency for Research on Cancer) concluded that crystalline silica inhaled from occupational sources can cause lung cancer in humans. However in making the overall evaluation, IARC noted that "carcinogenicity was not detected in all industrial circumstances studied. Carcinogenicity may be dependent on inherent characteristics of the crystalline silica or on external factors affecting its biological activity or distribution of its polymorphs." (IARC Monographs on the evaluation of the carcinogenic risks of chemicals to humans, Silica, silicates dust and organic fibres, 1997, Vol. 68, IARC, Lyon, France.)

In June 2003, SCOEL (the EU Scientific Committee on Occupational Exposure Limits) concluded that the main effect in humans of the inhalation of respirable crystalline silica dust is silicosis. "There is sufficient information to conclude that the relative risk of lung cancer is increased in persons with silicosis (and, apparently, not in employees without silicosis exposed to silica dust in quarries and in the ceramic industry). Therefore, preventing the onset of silicosis will also reduce the cancer risk..." (SCOEL SUM Doc 94-final, June 2003)

According to the current state of the art, worker protection against silicosis can be consistently assured by respecting the existing regulatory occupational exposure limits. Occupational exposure to nuisance dust (total and respirable) and respirable crystalline silica should be monitored and controlled.

Carcinogenicity

ACGIH Carcinogens

QUARTZ (CAS 14808-60-7)	A2 Suspected human carcinogen.

IARC Monographs. Overall Evaluation of Carcinogenicity

QUARTZ (CAS 14808-60-7)	1 Carcinogenic to humans.

US NTP Report on Carcinogens: Known carcinogen

QUARTZ (CAS 14808-60-7)	Known carcinogen.

12. Ecological Information

Ecotoxicity This product is not expected to produce significant ecotoxicity upon exposure to aquatic organisms and aquatic systems. The product is not expected to be hazardous to the environment.

Environmental effects Based on the physical properties of this product, significant environmental persistence and bioaccumulation would not be expected.

Persistence and degradability Not available.

13. Disposal Considerations

Disposal instructions Dispose in accordance with all applicable regulations. Material should be recycled if possible.

14. Transport Information

DOT

Not regulated as dangerous goods.

15. Regulatory Information

US federal regulations OSHA Process Safety Standard: This material is not known to be hazardous by the OSHA Highly Hazardous Process Safety Standard, 29 CFR 1910.119.

Drug Enforcement Administration (DEA). List 2, Essential Chemicals (21 CFR 1310.02(b) and 1310.04(f)(2)

Not regulated

DEA Essential Chemical Code Number

Not regulated

Drug Enforcement Administration (DEA). List 1 & 2 Exempt Chemical Mixtures (21 CFR 1310.12(c))

Not regulated

DEA Exempt Chemical Mixtures Code Number

Not regulated

CERCLA (Superfund) reportable quantity

None

Superfund Amendments and Reauthorization Act of 1986 (SARA)

Hazard categories Immediate Hazard - No
Delayed Hazard - Yes
Fire Hazard - No
Pressure Hazard - No
Reactivity Hazard - No

Section 302 extremely hazardous substance	No
Section 311 hazardous chemical	No
Food and Drug Administration (FDA)	Total food additive Direct food additive GRAS food additive

Inventory status

Country(s) or region	Inventory name	On inventory (yes/no)*
Australia	Australian Inventory of Chemical Substances (AICS)	Yes
Canada	Domestic Substances List (DSL)	Yes
Canada	Non-Domestic Substances List (NDSL)	No
China	Inventory of Existing Chemical Substances in China (IECSC)	Yes
Europe	European Inventory of Existing Commercial Chemical Substances (EINECS)	Yes
Europe	European List of Notified Chemical Substances (ELINCS)	No
Japan	Inventory of Existing and New Chemical Substances (ENCS)	No
Korea	Existing Chemicals List (ECL)	Yes
New Zealand	New Zealand Inventory	Yes
Philippines	Philippine Inventory of Chemicals and Chemical Substances (PICCS)	Yes
United States & Puerto Rico	Toxic Substances Control Act (TSCA) Inventory	Yes

*A "Yes" indicates that all components of this product comply with the inventory requirements administered by the governing country(s)

State regulations WARNING: This product contains a chemical known to the State of California to cause cancer.

US - California Proposition 65 - CRT: Listed date/Carcinogenic substance

QUARTZ (CAS 14808-60-7) Listed: October 1, 1988 Carcinogenic.

US - Pennsylvania RTK - Hazardous Substances: Listed substance

QUARTZ (CAS 14808-60-7) Listed.

16. Other Information

Recommended restrictions Workers (and your customers or users in the case of resale) should be informed of the potential presence of respirable dust and respirable crystalline silica as well as their potential hazards. Appropriate training in the proper use and handling of this material should be provided as required under applicable regulations.

Further information This safety datasheet only contains information relating to safety and does not replace any product information or product specification.

HMIS® ratings
Health: 1*
Flammability: 0
Physical hazard: 0

NFPA ratings
Health: 1
Flammability: 0
Instability: 0

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Issue date 22-June-2011

This data sheet contains changes from the previous version in section(s):	Composition / Information on Ingredients: Additional Components Composition / Information on Ingredients: Composition comments Fire Fighting Measures: Fire fighting equipment/instructions

Univar USA Inc Material Safety Data Sheet

For Additional Information contact MSDS Coordinator during business hours, Pacific time: (425) 889-3400

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INSTRUCTIONS FOR

CLOR-D-TECT® 1000

Used Oil Screening Kit

Test kit for chlorine contamionation in used oil

EACH KIT CONTAINS:

1. Tube #1 - A plastic test tube with a white dispensing cap containing a colorless ampule (bottom) and a yellow-dotted, gray ampule (top).
2. Tube #2 - A plastic test tube with yellow cap containing 7 ml of buffer solution, a yellow-dotted ampule (bottom) and a red-green ampule (top).
3. A 1 ml polypropylene sampling syringe and a tissue wipe.
4. A plastic filtration funnel.
5. A glass ampule contained in a cardboard sleeve and plastic tube designated as "Disposal Ampule".

READ CAUTION AND INFORMATION SECTIONS ON BACK BEFORE PERFORMING TEST. WEAR RUBBER GLOVES AND SAFETY GLASSES.

DIRECTIONS

1. PREPARATION Remove contents from box. Check contents to ensure that all items are present and intact. Place the two plastic tubes into the holder at the front of the box.

2. SAMPLE PREPARATION Unscrew the white dispensing cap from Tube #1. Work the plunger on the empty sampling syringe a few times to ensure that it slides easily. Place the tip of the syringe into the oil sample to be tested and slowly pull back on the plunger until it reaches the stop and cannot be pulled further. Remove the syringe from the oil sample and wipe any excess oil from the outside of the syringe with the enclosed tissue. Place the tip of the syringe in Tube #1 and dispense the oil sample by depressing the plunger. Replace the white dispensing cap securely.

3. REACTION Break the bottom (colorless) ampule in the tube by compressing the sides of the tube. Mix thoroughly by shaking the tube vigorously for about 30 seconds. Break the top (gray) ampule in the tube and shake thoroughly for about 20 seconds. Allow the reaction to proceed for an additional 40 seconds (total of one minute), while shaking intermittently several times.

4. EXTRACTION Remove the caps from both tubes and pour the clear buffer solution from Tube #2 (yellow cap) into Tube #1. Replace the white cap tightly on Tube #1 and shake vigorously for about 10 seconds. Vent the tube carefully by partially unscrewing the dispensing cap. Close securely and shake well for an additional 10 seconds. Vent again, tighten cap and stand tube upside down on its cap. Allow the phases to separate for a full two minutes.

5. ANALYSIS Place the plastic filtration funnel into Tube #2. Position Tube #1 over funnel and open nozzle on the dispensing cap. Be sure to point the nozzle away from the operator while opening it, and check that the nozzle is open completely before dispersing the clear solution. Dispense 5 ml of the clear solution through the filter into Tube #2 (up to the 5 ml line) by squeezing the sides of Tube #1. Close the nozzle on the dispensing cap on Tube #1 and remove the filter funnel from Tube #2. Replace the yellow cap on Tube #2 and break the bottom (colorless, yellow-dot) ampule and shake for 10 seconds. Break the top (colored) ampule and shake for 10 seconds.

6. RESULTS Observe the resultant color immediately and compare to the color chart below for chlorine determination.

7. DISPOSAL Open the "Disposal Ampule" container and drop the ampule into Tube #2. Replace the cap on the test tube. Crush the ampule by squeezing the sides of the tube. Shake for 5 seconds. This reagent immobilizes the mercury so that the kit passes the EPA's TCLP test. See caution section below for additional information on disposal.

SUGGESTIONS FOR USING THE CLOR-D-TECT® 1000 TEST KIT

- To test at 500 ppm chlorine instead of 1000, double the oil sample size by filling the sampling syringe twice.

- The kit is designed for testing used oils, and is not intended for use on water/oil mixtures that contain more than 20% water. For samples that contain more than 20% water, contact Dexsil about our Hydroclor-Q® kit designed for testing samples for chlorinated organic compounds in water.

- The kit works well on all types of waste and used oils including crankcase, hydraulic, diesel, lubricating, fuel oils and kerosene. It is designed for use only on oils which are hydrocarbon-based. Some oil, such as cutting oils which contain more that 3 or 4% sulfur, may give false positive results, false negatives are, however, unlikely. For any questions regarding the applicability of the kit on your sample, contact Dexsil's technical service department.

- The kit should be examined upon opening to see that all of the components are present and that all the ampules (5) are in place and not leaking. The liquid in Tube #2 (yellow cap) should be approximately ½ inch (1 cm) above the 5 ml line and the tube should not be leaking. The ampules are not intended to be completely full.

- Perform the test in a warm, dry area with adequate light. In cold weather, a truck cab is sufficient. If a warm area is not available, Step 3 should be performed while warming Tube #1 in palm of hand.

- Always crush the clear ampule in each tube first. If this sequence has not been followed, stop the test immediately and start over using another complete kit. When an incorrect testing sequence is followed, a false negative may result which may allow a contaminated sample to pass without detection.

- In Step 4, tip Tube #2 to an angle of only 45° to prevent the ampule holder from sliding out.

CAUTION

- When crushing the glass ampules, press firmly in the center of the glass ampule **ONCE**. Never attempt to recrush broken glass as it may come through the plastic and cut fingers.

- In case of accidental breakage or spillage onto skin or clothing, wash immediately with large amounts of water. All the ampules are poisonous and should not be taken internally.

- Do not carry kits on passenger aircraft.

- The gray ampule in the white-capped test tube contains metallic sodium. Metallic sodium is a flammable solid and is water reactive.

- Wear rubber gloves and safety glasses while performing test.

- Dispose of used kits properly. The mercury in Tube #2 is made insoluble by the disposable ampule and used kits will pass the USEPA TCLP test for land disposal. More stringent state and local regulations may apply. Contact Dexsil if you have any specific questions concerning disposal procedure.

- Read the Material Safety Data Sheet before performing the test.

- Keep Out of Reach of Children.

MANUFACTURER'S WARRANTY

This kit is warranted to be free of defects in material and workmanship until the expiration date stamped on the box. Manufacturer's sole and exclusive liability under this warranty shall be limited to replacement of any kit that is proven to be defective. Manufacturer shall not be liable for any incidental or consequential damages.

Reliable test results are highly dependent upon the care with which the directions are followed and, consequentially, cannot be guaranteed.

This kit is manufactured by DEXSIL® Corporation
One Hamden Park Drive, Hamden, Connecticut 06517
(203) 288-3509 FAX: (203) 248-6523
http:\\www.dexsil.com

Printed on recycled paper

Revision 4, ver.1, 6/04

Product Specification

Epoxy Floor Binder

Description:

Superstone's Epoxy Flooring Binder is a 100% solid, two component epoxy binder system. The product will satisfy USDA requirements for incidental food contact on floors, it is very user friendly, providing high chemical resistance and displaying the versatility of being used as a coating, as a binder to develop broadcast floors, chip floors, slurry/broadcast and trowel down.

Where to use:

The product was designed for application to warehouse and garage floors, workshops and manufacturing facilities, institutions such as hospitals and schools, loading docks and production areas, kitchens, lavatories and showers.

Surface Preparation:

All surfaces must be clean and free from dust, fully dried and completely cured. There should not be any presence of curing agents, form release agents, efflorescence, scale or any foreign substance that will interfere with adhesion.

New concrete should be allowed to cure for a minimum of 28 days and must be structurally sound and free of contaminants as described above. Any surface laitance should be removed by abrasive blasting. Eliminate surface defects such as honeycombs, cavities or similar by routing to a sound material. Sometimes surface repair has to be performed to enable a satisfactory job.

If required consult with Superstone for the Concrete Crack and Patch Repair. Confirm that there is no moisture coming out of the concrete prior to application. This can be done using plastic or polyethylene sheet taped on a test area where application will be performed. Allow to sit for 24-48 hours then check for sweating underneath the plastic or polyethylene sheet. If sweating occurs then it is not recommended to apply the product until the source of moisture has been eliminated. Do not apply to areas subjected to hydrostatic pressure.

All steel surfaces should be blasted in accordance with SSPC-SP10 or NACE #2 to a near white finish using clean dry blasting media.

Application:

Pre-mix each component, Part A and Part B before blending. Blending is performed by combining 2 parts by volume of Part A to one Part by volume of Part B. Thoroughly mix with a low speed drill motor or jiffy type mixer. Try not to incorporate air in the blend.

Product is estimated to provide a varying coverage rate depending on the type of binder system application. Actual coverage will be determined by surface temperatures, porosity, texture and thickness of the applied product.

EPOXY FLOOR BINDER SYSTEM	Sq. Ft/Gal
Floor Coating (20-30 mils)	
Primer Epoxy Floor Binder Clear	200-225
Basecoat	100
Seal Coat (optional)	150
Broadcast Floor (1/16"-1/8")	
Basecoat Epoxy Binder	100
Aggregate, lbs/sq. ft	0.5-1.0
Seal coat of Epoxy Floor binder	100-150
Broadcast Vinyl Chip Floor (1/32"-1/16')	
Basecoat	75-120
Vinyl chip, lb/sq. ft	0.25-0.50
Seal Coat (Epoxy binder Clear)	150
Slurry/ Broadcast	
Primer Epoxy floor binder Clear	200-225
Basecoat (1 gal resin to 12 lbs aggregate)	20
Seal coat (Epoxy floor binder)	150
Trowel Down	
Primer epoxy floor binder Clear	200-225
Basecoat @ 1/8" (1 gal resin to 40 lbs trowel grade aggregate)	40-45
Seal coat (Epoxy Floor binder)	100-150

Do not apply product when surface temperature is below 50°F. Do not apply to slabs on grade unless a heavy uninterrupted vapor barrier has been installed under the slab. Thinning is not recommended. It is advisable to apply a small test area to ensure proper application technique, adhesion and aesthetics.

PRODUCT DATA

Resin type: Two component epoxy resin and hardener system
Solids content: 100% ± 0.1% by weight
Gel time: 35-45 minutes
Tack-Free time: 4-5 hours
Weight per gallon: 8.5 lbs
Tensile Strength: 4500-5200 psi in accordance to ASTM D638
Elongation: 20-30% in accordance to ASTM D638
Compressive Strength, neat resin: 7500 psi @ 24 hours
9800 psi @ 7days
(in accordance to ASTM D695)
Bond Strength: >concrete in accordance to ASTM D4541
Flammability: Self Extinguishing according to ASTM D635
Hardness: Shore D 85-90 in accordance with ASTM D2240
Water Absorption: <0.5% after 24 hrs according to ASTM D570
Abrasion Resistance: 36 mg in accordance with ASTM D4060
Monolithic Surfacing: Passes in accordance with ASTM C722

Colors:

Product is available in Clear, Light gray, Dark Gray and Tile Red. Custom colors are available but subject to minimum quantity orders.

It is recommended to store material between 50°F and 90°F. Material has a useable shelf life of 24 months in original container and recommended storage conditions.

Caution:
Keep out of reach of children. Keep away from moist conditions and freezing. For safety and environmental precautions, review the MSDS sheets for this product.