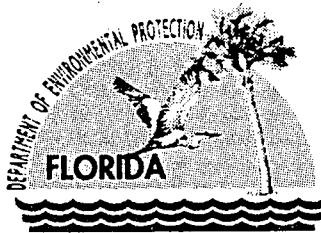


View/Act

Prog Area	Activity	Date Done	Date Due	Date Completed	E V	
HW	CWOE	COMPLIANCE W/O FORMAL ENFORCEMENT	10/21/2002		10/21/2002	
HW	CCD	CASE CLOSED BY DISTRICT	10/21/2002		10/21/2002	
HW	SRVC	SUBMITTAL RECEIVED BY DEPARTMENT	09/23/2002			
HW	WLI	WARNING LETTER ISSUED	08/06/2002		08/06/2002	
HW	CEI	COMPLIANCE EVALUATION INSPECTION	03/20/2002		03/20/2002	Y

Press [PAGE DOWN] for Activity Details (Change View)

PROJECT # 256531



Jeb Bush
Governor

Department of Environmental Protection

Southwest District
3804 Coconut Palm Drive
Tampa, Florida 33619

David B. Struhs
Secretary

October 21, 2002

Mr. Gary R. Allen
US Filter MidAtlantic, Inc.
105 South Alexander Street
Plant City, FL 33566

RE: International Petroleum Corporation
EPA ID# FLD 065 680 613
Warning Letter # 256531
Hillsborough County

Dear Mr. Allen:

The Department has reviewed your response to Warning Letter # 256531. Since the violations cited in the referenced warning letter have been corrected, this file is being closed. We appreciate your prompt attention to the resolution of this matter.

Sincerely,

William Kutash
Administrator
Division of Waste Management

SET
WK/afg

cc: Steven Ray, HWR Section, FDEP-Tallahassee
Compliance File

E'C Teaks

Guy COWDEN

Mike McKelvy

Stephanie Wickham
from EPC

Cathy Porthouse
CATHY

772-

468-2300

U.S. Filter



Jim - If attached paper work
is OK. I'll write up
The closure letter
APP

5690 West Midway Road
Ft. Pierce, FL 34981
(561) 468-2300 Main
(561) 468-9328 Fax

FAX TRANSMISSION

To: Jim Dregne / Al Gephart

From: USFilter

Attn: FDEP - Tampa

Sender: Catherine Porthouse

Fax: (813) 744-6125

Ext. _____

Date: 9/20/02

Pages: 4 (includes cover)

☒ Urgent

☐ For Review

☐ Please Comment

☐ Please Reply

COMMENTS:

Jim,

I was under the impression the 24th was
the deadline per our conversation. Sorry for the
inconvenience

Cathy

7002 1000 0004 9269 6260

U.S. Postal Service
CERTIFIED MAIL RECEIPT
(Domestic Mail Only; No Insurance Coverage Provided)

OFFICIAL USE

Postage	\$ 1.52
Certified Fee	\$2.30
Return Receipt Fee (Endorsement Required)	\$1.75
Restricted Delivery Fee (Endorsement Required)	\$0.00
Total Postage & Fees	\$ 5.57

0270
05 Postmark
Here

09/20/2002

Sent To
F. FL DEP - AL GEPHART
Street, Apt. No.,
or PO Box No. 3804 Coconut Palm Drive
City, State, ZIP+4
Tampa, FL 33619

PS Form 3800, Apr 1992

See Reverse for Instructions



RECOVERY SERVICES
5690 WEST MIDWAY ROAD
FORT PIERCE, FL 34981

TELEPHONE 772-468-2300
FACSIMILE 772-468-9328

September 17, 2002

Certified Mail/Return Receipt Requested: 7002 1000 0004 9269 6280

Al Gephart, Engineer IV
Florida Department of Environmental Protection
3804 Coconut Palm Drive
Tampa, FL 33619

RE: International Petroleum Corporation
EPA ID# FLD 065 680 613
Warning Letter#256531
Hillsborough County

Dear Mr. Gephart:

The purpose of this letter is to advise you of USFilter Recovery Services MidAtlantic's (USFilter) position in response to your Warning Letter, dated August 6, 2002, of possible violations of law for which International Petroleum Corporation of Florida Inc. (IPC) may have been responsible. USFilter acquired IPC via Court auction as a result of bankruptcy proceedings. The alleged violations observed during the hazardous waste program field inspection conducted on March 20, 2002 were prior to USFilter's acquisition of IPC on June 21, 2002. Although the alleged violations occurred prior to the acquisition of IPC, USFilter is acting in good faith by submitting the following for review in response to your letter.

The August 6 letter provided recommendations in response to two alleged violations, noting that the third was corrected. Following your Department's recommendations for the first violation (40CFR 262.42), as best as we can determine, the attached documents involve the tracing of the shipment of manifests #82155, #85120 and #84551. The second violation (62-710.850(6)(a)) has been addressed by providing our drivers Halogen Determination and Documentation training on September 5 and 12 of 2002. The training covered proper use of gas meters and Dexsil; proper documentation on the manifest and what to do if a contaminated load is encountered.

We hope that this information answers any questions you may have regarding this matter. For further assistance, please contact me in the Ft. Pierce USFilter Recovery Services office at (772) 468-2300.

Sincerely,

Catherine A. Porthouse
Environmental Health & Safety Manager
USFilter Recovery Services MidAtlantic Inc.

Page 2

Department of Environmental Protection
September 12, 2002

CP/bms

Cc: Tim Ford, USFilter MidAtlantic Inc.
Garry Allan, USFilter MidAtlantic Inc.

Attachments: Timeline of Manifests #82155, #85120, and #84551
Non-Hazardous Waste Manifest #82155
CSX TransFlo Work Order #009918-000002
CSX TransFlo Weigh Bill dated 04 Jan 02
Non-Hazardous Waste Manifest #84551
CSX TransFlo Work Order #009918-000004
CSX TransFlo Weigh Bill dated 21 Jan 02
Non-Hazardous Waste Manifest #85120
CSX TransFlo Work Order #009918-000007
CSX TransFlo Weigh Bill dated 25 Jan 02
International Services Inc. Certified Analysis for PLMX 2818
Giant Resource Recovery Material Profile Number 2180
Uniform Hazardous Waste Manifest #22120
Giant Cement Co./GRR Land Disposal Restriction Notification Form
Giant Cement Company Certificate of Material Reuse
Federal Railroad Report for PLMX 2818 (1/24/02-6/17/02)

September 17, 2002

Certified Mail/Return Receipt Requested: 7002 1000 0004 9269 6280

Al Gephart, Engineer IV
Florida Department of Environmental Protection
3804 Coconut Palm Drive
Tampa, FL 33619

RE: International Petroleum Corporation
EPA ID# FLD 065 680 613
Warning Letter#256531
Hillsborough County



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We hope that this information answers any questions you may have regarding this matter. For further assistance, please contact me in the Ft. Pierce USFilter Recovery Services office at (772) 468-2300.

Sincerely,

A handwritten signature in cursive script, appearing to read "Catherine A. Porthouse".

Catherine A. Porthouse
Environmental Health & Safety Manager
USFilter Recovery Services MidAtlantic Inc.

Rec'd FAXED copy on 9-20-02

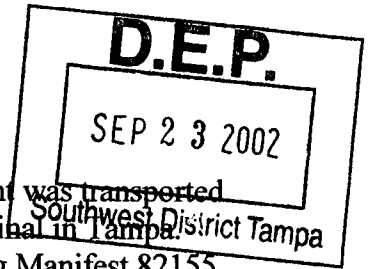
CP/bms

Cc: Tim Ford, USFilter MidAtlantic Inc.
Garry Allan, USFilter MidAtlantic Inc.

Attachments: Timeline of Manifests #82155, #85120, and #84551
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Giant Cement Company Certificate of Material Reuse
Federal Railroad Report for PLMX 2818 (1/24/02-6/17/02)

Timeline of Manifests #82155, #85120, 84551

Manifest #82155 – On 01/04/02, 681 Gallons destined for Giant Cement was transported by IPC and received by the secondary transporter, CSX TransFlo Terminal in Tampa. Work Order # 009918-000002 (accompanied by weigh bill), identifying Manifest 82155, indicates 681 Gallons “of oil delivered to railcar# PLMX2818” by CSX TransFlo.



Manifest #84551 – On 01/21/02, 619 Gallons destined for Giant Cement was transported by IPC and received by the secondary transporter, CSX TransFlo Terminal in Tampa. Work Order # 009918-000004 (accompanied by weigh bill), identifying Manifest 84551, indicates 615 Gallons (weigh bill notes 619) “of oil delivered to railcar# PLMX2818” by CSX TransFlo.

Manifest #85120 – On 1/25/02, 622 Gallons destined for Giant Cement was transported by IPC and received by the secondary transporter, CSX TransFlo Terminal in Tampa. Work Order # 009918-000007 (accompanied by weigh bill), identifying Manifest 85120, indicates 622 Gallons “of oil delivered to railcar# PLMX2818” by CSX TransFlo.

Sample was taken on 01/31/02 – Certified Analysis from International Services, Inc. for PLMX2818 indicating sample taken and analyzed for Metals, PCBS and Solvents (see analysis for results)

2/9/02 – Railcar# PLMX2818 was released from the CSX TransFlo Terminal destined for Norwood, North Carolina according to Federal Railroad Report

2/12/02 – Profile, LDR and Uniform Hazardous Waste Manifest #22120 generated for Railcar# PLMX2818

2/15/02 – Railcar# PLMX2818 arrived at AquaDale/Solite (owned by Giant Cement) in Norwood, North Carolina according to Federal Railroad Report

3/14/02 – Giant Resource Recovery (GRR) gives corporate approval and receives State of South Carolina approval per phone conversation (8/29/02) with Sandra Chzasz with GRR

5/6/02 - Railcar# PLMX2818 released from AquaDale/Solite in North Carolina destined for Giant Resource Recovery in South Carolina

5/10/02 – Railcar# PLMX2818 arrived at Giant Resource Recovery in South Carolina

5/20/02 – Giant Resource Recovery signs Hazardous Waste Manifest #22120

Please print or type. (Form designed for use on 12-pitch typewriter.)

Form Approved. OMB No. 2050-0039.

7:200 19123

UNIFORM HAZARDOUS WASTE MANIFEST		1. Generator's US EPA ID No. <i>F.L.D.0656806.1322120</i>		Manifest Document No.		2. Page 1 of		Information in the shaded areas is not required by Federal law.	
3. Generator's Name and Mailing Address <i>INTERNATIONAL PETROLEUM 105 S Alexander Plant City, FL 33560</i>				State Manifest Document Number		State Generator's ID			
4. Generator's Phone <i>813-754-1504</i>				State Transporter's ID		Transporter's Phone			
5. Transporter 1 Company Name <i>CSX TRANSPORTATION</i>				6. US EPA ID Number <i>F.L.D.006921340</i>		State Transporter's ID		Transporter's Phone <i>904-633-1673</i>	
7. Transporter 2 Company Name				8. US EPA ID Number		State Transporter's ID		Transporter's Phone	
9. Designated Facility Name and Site Address <i>GIANT RECOVERY Resource Recovery 482 Seven miles Rd Hartsville, SC 29448</i>				10. US EPA ID Number <i>SC.D.003351699</i>		State Facility's ID		Facility's Phone <i>803-446-2200</i>	
11. US DOT Description (Including Proper Shipping Name, Hazard Class and ID Number)				12. Containers		13. Total Quantity		14. Unit Wt/Vol	
a. <input checked="" type="checkbox"/> HM <i>HAZARDOUS WASTE LIQUID NOS. 9, NA 3082, PG III</i>				No. Type		22403		Waste No.	
b.						182406		<i>1015 F015 F015 D001 D001 J013</i>	
c.									
d.									
Additional Descriptions for Materials Listed Above <i>OFF SPEC FUEL OIL</i>				Handling Code for Wastes Listed Above					
15. Special Handling Instructions and Additional Information									
<p>16. GENERATOR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national government regulations.</p> <p>If I am a large quantity generator, I certify that I have a program in place to reduce the volume and toxicity of waste generated to the degree I have determined to be economically practicable and that I have selected the practicable method of treatment, storage, or disposal currently available to me which minimizes the present and future threat to human health and the environment; OR, if I am a small quantity generator, I have made a good faith effort to minimize my waste generation and select the best waste management method that is available to me and that I can afford.</p>									
Printed/Typed Name <i>STEPHEN HANCOCK</i>				Signature <i>[Signature]</i>				Month Day Year <i>10/21/2012</i>	
17. Transporter 1 Acknowledgement of Receipt of Materials									
Printed/Typed Name <i>GARY R. ALLEN for CSX RR</i>				Signature <i>[Signature]</i>				Month Day Year <i>10/21/2012</i>	
18. Transporter 2 Acknowledgement of Receipt of Materials									
Printed/Typed Name				Signature				Month Day Year	
19. Discrepancy Indication Space <i>Section 13 should Read 22403 G</i>									
20. Facility Owner or Operator: Certification of receipt of hazardous materials covered by this manifest except as noted in Item 19.									
Printed/Typed Name <i>Judith Boler</i>				Signature <i>[Signature]</i>				Month Day Year <i>10/22/2012</i>	

Style CF 17 LABELMASTER, AN AMERICAN LABELMARK CO., CHICAGO, IL 60646 (800)621-5800

EPA Form 8700-22 (Rev. 9-88) Previous editions are obsolete.

ORIGINAL-RETURN TO GENERATOR

GIANT CEMENT CO./GRR LAND DISPOSAL REST TION NOTIFICATION FORM

GENERATOR NAME/LOCATION: International Petroleum Corporation 105 S. Alexander
 MANIFEST #: 22120 PROFILE#: 2180
 WASTE CODES: F001, F003, F005, D004, D006, D018

This form must be completed to comply with the rules set forth by the Environmental Protection Agency in 40 CFR Part 268. An original signed copy of this form must accompany the manifest for all waste shipments to Giant. Please note that for the purpose of complying with these regulations, which require notification of the treatability group (wastewater or non-wastewater) of each waste, Giant states that all hazardous wastes received will be in the non-wastewater category as defined in 40 CFR 268.2 (d).

I. If this waste is contains any of the waste codes D001, D002, D012-D043, F001-F005, F039, OR any wastes prohibited from land disposal under 40 CFR 268.32 (California List Wastes) or RCRA Section 3004 (d), the underlying hazardous constituents must be identified.

Please check the applicable underlying hazardous constituent(s) on the reverse side of this form. An underlying hazardous constituent is defined in 40 CFR Part 268.2 (f) as "...any constituent listed in 268.48...Table UTS—Universal Treatment Standards, except zinc, which can reasonably be expected to be present at the point of generation of the hazardous waste, at a concentration above the constituent specific UTS...". Please note that this is not the complete UTS table, but has been edited to omit those constituents not accepted at Giant.

II. If this waste contains D001-D011 or any other F, U, P, or K codes, please list the codes and all other applicable data in the table below. Attach additional sheets if necessary.

WASTE CODE	DESCRIPTION OR SUBCATEGORY	TREATMENT STANDARD: STEEPER 804 CODE OR CONCENTRATION
F001	Halogenated Solvents	602.3 mg/kg
F003	Non Halogenated Solvents	543.6 mg/kg
F005	Non Halogenated Solvents	441.3 mg/kg
D004	Arsenic	.1745 mg/kg
D006	Cadmium	.047 mg/kg
D018	Benzene	63.01 mg/kg

III. NOTIFICATION STATEMENTS (Please check one.)

I notify that I am familiar with the waste through analysis and testing or through knowledge of the waste to support this notification that the waste is not restricted as specified in 40 CFR part 268, Subpart D or any applicable prohibitions set forth in 40 CFR 268.32 or RCRA Section 3004 (d).

I notify that I am familiar with the waste through analysis and testing or through knowledge of the waste to support this notification that the waste is subject to treatment standards specified in 40 CFR Subpart D and all applicable prohibitions set forth in 40 CFR 268.32 or RCRA Section 3004 (d).

SIGNATURE: [Signature] TITLE: Superior
 PRINTED NAME: STEPHEN HARRIS DATE: 2/12/02

GIANT IMPERMISSIBLE DILUTION/BENZENE NESHAPS CERTIFICATION FORM

MANIFEST NUMBER: 22120
 APPROVAL NUMBER: #2180

GENERATOR NAME: IPC / MAGNUM
 LOCATION: PLANT CITY, FL

IMPERMISSIBLE DILUTION CERTIFICATION

I hereby certify that the wastestream corresponding to the above Manifest and Approval Numbers has sufficient organic or cyanide content to justify combustion and thus has not been impermissibly diluted with regard to the following EPA hazardous waste codes (if any are present) for metal-bearing wastes. I also certify that this material does not contain impermissibly diluted PCB's.

Please check each code that applies to your wastestream or indicate that none are present in this shipment:

☒ D004 ☐ D005 ☒ D006 ☐ D007 ☐ D008
☐ D009 ☐ D010 ☐ D011 ☐ F006 ☐ F007
☐ F008 ☐ F009 ☐ F010 ☐ F011 ☐ F012
☐ K002 ☐ K003 ☐ K004 ☐ K005 ☐ K006
☐ K007 ☐ K008 ☐ K009 ☐ K100 ☐ P029
☐ P074 ☐ P120 ☐ U145 ☐ U151 ☐ U204
☐ U205 ☐ U216 ☐ U217

THIS SHIPMENT DOES NOT CONTAIN ANY OF THE ABOVE WASTE CODES.

Signature: Stephen Harris

Printed Name: STEPHEN HARRIS

Title: Supervisor Date: 2/12/02

BENZENE NESHAPS CERTIFICATION

Please check the item below which indicates your status in regard to the reporting requirements under 40 CFR Part 61, Subpart FF. This statement must accompany each shipment regardless of whether the referenced regulation is applicable to your operation.

☐ This waste does not contain benzene.
☒ This waste contains benzene which is not subject to 40 CFR Part 61, Subpart FF.

Concentration: 63.01 ppm or % (CIRCLE ONE)

☐ This waste contains benzene which is required to be controlled, and is treated in accordance with the provisions of 40 CFR Part 61, Subpart FF [61.342(f)(2)].

Concentration: _____ ppm or % (CIRCLE ONE)

I certify under penalty of law that the above information is true, accurate, and complete with regard to the wastestream corresponding to the above Manifest and Approval Numbers. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

Signature: Stephen Harris

Printed Name: STEPHEN HARRIS

Title: Supervisor Date: 2/12/02

GIANT CEMENT CO./GRR PARTIAL LIST OF UNIVERSAL TREATMENT STANDARDS (UTS) FOR UNDERLYING HAZARDOUS CONSTITUENTS

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY (USEPA) STANDARD METHODS FOR THE DETERMINATION OF HAZARDOUS WASTE CONCENTRATIONS (MCLs) FOR UNDERLYING HAZARDOUS CONSTITUENTS									
(Check all that apply)									
Acenaphthene	3.4	Dibromomethane	15.0	Heptachlor epoxide	0.066	Propionitrile	1.5		
Acenaphthene	3.4	2,4-D	10.0	Hexachlorobenzene	19.0	Pyrene	8.2		
Acetone	160.0	Dibenz(a,h)anthracene	8.2	Hexachlorobutadiene	5.6	Pyridine	16.0		
Acetonitrile	1.8	Dibenz(a,l)pyrene	N/A	Hexachlorocyclopentadiene	2.4	Sabla	22.0		
Acetophenone	9.7	m-Dichlorobenzene	6.0	Hexachloromethane	30.0	Silvex (2,4,5-TP)	7.9		
2-Acetylaminofluorene	140.0	o-Dichlorobenzene	6.0	Hexachloromethylene	30.0	2,4,5-T (2,4,5-Trichlorophenoxyacetic acid)	7.9		
Acrylamide	23.0	p-Dichlorobenzene	6.0	Indenol (2,3-o)luorene	3.4	1,2,4,5-Tetrachlorobenzene	14.0		
Acrylonitrile	84.0	Dibromodifluoromethane	7.2	Iodobenzene	65.0	1,1,1,2-Tetrachloroethane	6.0		
4-Aminobiphenyl	N/A	1,1-Dichloroethane	6.0	Isobutanol	170.0	1,1,2,2-Tetrachloroethane	6.0		
Aniline	14.0	1,2-Dichloroethane	6.0	Isosorbite	2.8	Tetrachloroethylene	6.0		
Anthracene	3.4	1,1-Dichloroethylene	6.0	Isosorbite	0.13	2,3,4,5-Tetrachlorophenol	7.4		
gamma-BHC	0.066	trans-1,2-Dichloroethylene	30.0	Methacrylonitrile	84.0	Toluene	10.0		
Benzene	10.0	2,4-Dichlorophenol	14.0	Methanol	~0.75	Toxaphene	2.6		
Benz(a)anthracene	3.4	2,6-Dichlorophenol	14.0	Methoxybenzene	1.5	Bromobenzene (Tribromomethane)	15.0		
Benzal chloride	6.0	1,2-Dichloropropane	18.0	Methoxychlor	0.18	1,2,4-Trichlorobenzene	19.0		
Benzobifluoranthene	6.8	cis-1,3-Dichloropropane	18.0	3-Methoxychlorobenzene	15.0	1,1,1-Trichloroethane	6.0		
Benzobifluoranthene	6.8	trans-1,3-Dichloropropane	18.0	4-Methylstyrene (2-chlorostyrene)	30.0	1,1,2-Trichloroethane	6.0		
Benzofluoranthene	1.8	Difluorophthalate	28.0	Methyl chloride	30.0	Trichloroethylene	6.0		
Benzofluorene	3.4	2,4-Dimethylphenol	14.0	Methyl ethyl ketone	35.0	Trichlorofluoromethane	30.0		
Bromodichloromethane	15.0	Dimethyl phthalate	28.0	Methyl isobutyl ketone	33.0	2,4,5-Trichlorophenol	7.4		
Methyl bromide	15.0	Di-n-butyl phthalate	28.0	Methyl methacrylate	160.0	2,4,6-Trichlorophenol	7.4		
4-Bromocyclohexene	15.0	1,4-Dinitrobenzene	2.3	Methyl methanesulfonate	N/A	1,2,3-Trichloropropane	30.0		
n-Butyl alcohol	2.6	2,4-Dinitrophenol	160.0	Naphthalene	5.6	1,1,2-Trichloro-1,2,2-trifluoroethane	30.0		
Butyl benzyl phthalate	28.0	2,4-Dinitrotoluene	140.0	2-Naphthylamine	N/A	tris-(2,3-Dibromoisopropyl) phosphite	0.10		
Carbon disulfide	~4.8	2,6-Dinitrotoluene	28.0	o-Nitroaniline	14.0	Vinyl chloride	6.0		
Carbon tetrachloride	6.0	Dio-n-butyl phthalate	28.0	p-Nitroaniline	28.0	Xylenes (sum of o-, m-, & p-isomers)	30.0		
Chlordane	0.26	Dinitroaminobenzene	N/A	Nitrobenzene	14.0	Anilmony	~2.1		
o-Chloroaniline	18.0	Di-n-propylthiosamine	14.0	5-Nitro-o-toluidine	28.0	Arsenic	~5.0		
Chlorobenzene	6.0	1,4-Dioxane	170.0	o-Nitrophenol	13.0	Barium	~7.8		
2-Chloro-1,3-butadiene	0.26	Ophenylamine	13.0	p-Nitrophenol	29.0	Beryllium	~0.014		
Chlorodibromomethane	15.0	Diphenylamine	13.0	N-Nitrosodiphenylamine	2.3	Cadmium	~0.19		
Chloroethane	6.0	Diphenylhydrazine	N/A	N-Nitroso-d-n-butylamine	17.0	Chromium (total)	~0.85		
Bis-(2-Chloroethyl) methane	7.2	Endosulfan I	0.066	N-Nitrosomethylamine	2.3	Cyanides (total)	590.0		
Bis-(2-Chloroethyl) ether	6.0	Endosulfan II	0.13	N-Nitrosomorpholine	2.3	Cyanides (amenable)	30.0		
Chloroform	6.0	Endrin	0.13	N-Nitrosopyrrolidine	35.0	Fluoride	N/A		
Bis-(2-Chloroisopropyl) ether	7.2	Endrin aldehyde	0.13	N-Nitrosopyrrolidine	35.0	Lead	~0.37		
o-Chloro-m-cresol	14.0	Ethyl acetate	33.0	PCBs (total sum of all isomers)	10.0	Mercury (non-wastewater from refineries)	~0.20		
2-Chloroethylvinyl ether	N/A	Ethyl benzoate	380.0	Pentachlorobenzene	10.0	Mercury (all others)	~0.025		
Chloromethane (Methyl chloride)	30.0	Ethyl ether	160.0	Pentachloroethane	6.0	Nickel	~5.0		
2-Chloromethylalane	5.6	Bis-(2-ethylhexyl) phthalate	28.0	Pentachloronitrobenzene	4.8	Selenium	~0.16		
2-Chlorophenol	5.7	Ethyl methacrylate	162.0	Pentachlorophenol	7.4	Silver	~0.30		
3-Chloropropane	30.0	Ethylene oxide	N/A	Phenacetin	16.0	Sulfide	N/A		
Chrysene	3.4	Fluorene	3.4	Phenanthrene	5.6	Therium	~0.078		
o-Cresol	5.6	Fluorene	3.4	Phenol	6.2	Vanadium	~0.22		
m-Cresol	5.6	Fluorene	3.4	Phthalic acid	28.0				
Cyclohexanone	~0.75	Heptachlor	0.066	Phthalic anhydride	28.0				

Grr!

PO Box 352
Highway 453 North at I-26
Hawthorne, SC 29448

MATERIAL PROFILE FORM

GIANT RESOURCE RECOVERY COMPANY, INC.

(800) 786-0477 (803) 496-2200 Fax (803) 496-2228

Profile Number: 2180

Approval/HV Number: 2180

GENERATOR INFORMATION

GENERATOR NAME: IPC/MAGNUM

PHYSICAL ADDRESS: 105 SOUTH ALEXANDER STREET

MAILING ADDRESS: SAME

CITY/STATE/ZIP: PLANT CITY, FLORIDA 33566

EPA ID#: FLD 065 680 613

CONTACT: GARRY ALLEN / DEBBIE MULLEN

TELEPHONE: 813-754-1504

FAX #: 813-754-6174

BILLING INFORMATION

COMPANY NAME: IPC/MAGNUM

ADDRESS: 105 SOUTH ALEXANDER STREET

CITY/STATE/ZIP: PLANT CITY, FLORIDA 33566

CONTACT: GARRY ALLEN / DEBBIE MULLEN

TELEPHONE: 813-754-1504

FAX #: 813-754-6174

BROKER INFORMATION (If different from above)

COMPANY NAME: N/A

ADDRESS: _____

CITY/STATE/ZIP: _____

CONTACT: _____

TELEPHONE: _____

FAX #: _____

SECTION I MATERIAL IDENTIFICATION

NAME OF MATERIAL: OFF SPECIFICATION USED OIL

GENERATING PROCESS: USED OIL RECYCLING

ANNUAL QUANTITY GENERATED: VARIES 60 TO 80 THOUSAND PER YR.
gallons tons pounds (Circle one)

FREQUENCY: MONTHLY

CONTAINER TYPE (Circle all that apply):

☒ tankers ☒ rail cars ☐ tote bins ☐ roll-offs ☐ dump trucks ☐ super sacks ☐ drums
other (please specify) _____

EPA WASTE CODES (If applicable):

F001 F005 - F003-D00
D018-D006

SECTION II MATERIAL COMPOSITION

CONSTITUENT	TLV/PEL (units)	CONC. (units)	CONSTITUENT	TLV/PEL (units)	CONC. (units)
TETRACHLORETHENE	NE	576.8 ppm			
TRICHLOROETHENE	NE	25.5 ppm			
PCB		1.64 ppm			

SECTION III DOT SHIPPING INFORMATION

SHIPPING NAME PETROLEUM OIL

HAZARD CLASS: 3

UN/NA NO.: 1270 PACKAGING GROUP: III RQ: NA

1. A representative sample must be submitted with this profile form in order to obtain approval.
2. Any applicable analytical data and/or MSDS's should be attached.
3. Hazardous wastes require submission of a South Carolina Authorization Request Form/Notice of Acceptance Form (ARF/NOA) and an Air Toxics Survey Form. (Some non-hazardous wastes may also require these forms).

SECTION IV. PHYSICAL CHEMICAL DATA

COLOR: BROWNISH - YEI ' W

ODOR (Describe): MILD PE...OLEUM

pH: 6 TO 9

FLASHPOINT (°F): 132°F

PHYSICAL STATE (70°F) FLUID

SPECIFIC GRAVITY 0.893 sp. grav

VISCOSITY 80 ssu @ 100°F

BTUS 19,182

WATER (%): 8.0%

SOLIDS (%): 0.8%

ASH (%): 0.193%

HALOGENS: 518 ppm

NITROGEN

SULFUR: <1.0%

SECTION V. ADDITIONAL CONSTITUENTS CHARACTERISTICS

TOTAL METALS (Indicate concentration in ppm.)

ANTIMONY (Sb):	NICKEL (Ni):
ARSENIC (As): 0.745 ppm	SELENIUM (Se):
BARIUM (Ba): 17.7 ppm	SILVER (Ag):
BERYLLIUM (Be):	THALLIUM (Tl):
CADMIUM (Cd): 0.047 ppm	ZINC (Zn):
CHROMIUM (Cr): 0.479 ppm	OTHERS:
COPPER (Cu): 13.0 ppm	
LEAD (Pb): 3.95 ppm	
MERCURY (Hg):	

OTHER INFORMATION

	YES	NO	CONC.
PCB'S:	X		1.64%
CYANIDES:		X	
SULFIDES:		X	
PESTICIDES:		X	
DIOXINS:		X	
CARCINOGENS:		X	
INFECTIOUS/BIOLOGICAL:		X	N/A
RADIOACTIVE:		X	N/A
REACTIVE (Specify water, air, etc.)		X	Specify:

SECTION VI. FIRE AND EXPLOSIVE DATA

(List any special precautions and/or conditions to avoid, Lower Explosion Limit (LEL), Upper Explosion Limit (UEL), fire fighting equipment, etc.)

SECTION VII. REACTIVITY DATA

Note any incompatible materials, polymerization initiators, and results of contact with any of these materials

SECTION VIII. HEALTH HAZARD/SPECIAL PROTECTION INFORMATION

Note if material is toxic by inhalation, ingestion, skin absorption, etc., and any special personal protective equipment (ppe) required for handling.

SECTION IX. ADDITIONAL INFORMATION

SECTION X. GENERATOR'S CERTIFICATION

I hereby certify that the information contained in this form and any attached document(s) is true and accurate to the best of my knowledge and all relevant information regarding known or suspect hazards has been disclosed.

SIGNATURE:

PRINTED NAME:

BARRY R. ARUED

TITLE:

DATE:

2-12-02

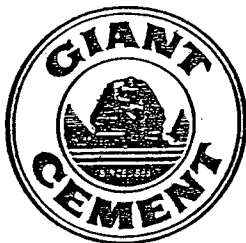
PROFILE #: P0227
GENERATOR: CHEMSOURCE
APPROVAL #: F0620

**GRR! MATERIAL PROFILE FORM
ADDENDUM 1**

PHOSGENE (CARBONYL CHLORIDE)
ACROLEIN
p-AMINODIPHENYL
BENZIDINE
BIS (CHLOROMETHYL) ETHER
DIAZOMETHANE
KETENE
METHYL ISOCYANATE
a-NAPHTHYLAMINE
b-NAPHTHYLAMINE
NICKEL CARBONYL
4-NITROBIPHENYL
p-NITROPHENOL
NITROSODIMETHYLAMINE
p-NITROSOPHENOL
PHOSPHINE

I hereby certify that none of the compounds listed above are contained in the wastestream identified on the attached Grr! Profile and its corresponding SC Air Toxics Survey Form.

PRINTED NAME: GARY R. ALLEN DATE: 2-12-02
SIGNATURE: [Signature] TITLE: President



GIANT CEMENT COMPANY

Post Office Box 218
Harleyville, South Carolina 29448

Plant:
(803) 496

Fax:
(803) 496

* CERTIFICATE OF MATERIAL REUSE *

June 11, 2002

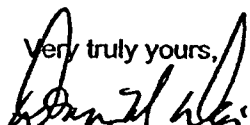
This certificate is to serve as evidence of total reuse of waste fuel materials received from your company as follows:

	<u>DATE</u>	<u>MANIFEST</u>	<u>QUANTITY</u>	<u>POUNDS</u>
2180				
IPC MAGNUM				
	05/22/2002	22120	22,403.00	163,098.32

TOTAL		1	22,403.00	163,098.32

This material was received by our facility and will be utilized as fuel in our rotary cement kilns, resulting in its destruction, and this meets all requirements as defined in 40 CFR Part 268, Subpart D.

Very truly yours,


Donna M. Davis
Facility Sales Manager

DMD/ssb
cc: Grrl

PLMX 002B18	E	JACKSONVI FL	8/17/2002 06:46 PM	CSX Transportation	Actual Place	JACKSONVI FL	Y22517	0
	E	JACKSONVI FL	8/16/2002 11:20 PM	CSX Transportation	Const Place	JACKSONVI FL		530
	E	JACKSONVI FL	8/16/2002 12:06 AM	CSX Transportation	Arrival Destin	JACKSONVI FL	Q45715	629
	E	WAYCROSS GA	8/15/2002 09:00 PM	CSX Transportation	Departure	JACKSONVI FL	Q45715	628
	E	WAYCROSS GA	8/15/2002 02:20 AM	CSX Transportation	Arrival	JACKSONVI FL	Q60414	527
	E	BALDWIN FL	8/14/2002 06:50 PM	CSX Transportation	Departure	JACKSONVI FL	Q60414	526
	E	BALDWIN FL	8/14/2002 05:10 PM	CSX Transportation	Arrival	JACKSONVI FL	Q60414	625
	E	WINSTON FL	8/14/2002 10:10 AM	CSX Transportation	Departure	JACKSONVI FL	Q60414	524
	E	WINSTON FL	8/5/2002 05:54 PM	CSX Transportation	B/O Release	PLANTCITY FL		523
	E	WINSTON FL	8/4/2002 04:48 PM	CSX Transportation	Bad Order	PLANTCITY FL	L 024	622
	E	WINSTON FL	8/4/2002 12:30 PM	CSX Transportation	Arrival Destin	PLANTCITY FL	Q60304	521
	E	BALDWIN FL	8/4/2002 05:30 AM	CSX Transportation	Departure	PLANTCITY FL	Q60304	520
	E	BALDWIN FL	8/4/2002 05:10 AM	CSX Transportation	Arrival	PLANTCITY FL	Q60304	519
	E	WAYCROSS GA	8/4/2002 01:00 AM	CSX Transportation	Departure	PLANTCITY FL	Q60304	518
	E	WAYCROSS GA	8/2/2002 10:30 PM	CSX Transportation	Arrival	PLANTCITY FL	Q49102	517
	E	EASSAVANN GA	8/2/2002 07:05 PM	CSX Transportation	Departure	PLANTCITY FL	Q49102	516
	E	EASSAVANN GA	8/2/2002 08:20 PM	CSX Transportation	Arrival	PLANTCITY FL	Q49102	515
	E	FLORENCE SC	8/2/2002 11:20 AM	CSX Transportation	Departure	PLANTCITY FL	Q49102	514
	E	FLORENCE SC	8/2/2002 08:00 AM	CSX Transportation	Arrival	PLANTCITY FL	Q49102	513
	E	HAMLET NC	8/2/2002 04:30 AM	CSX Transportation	Departure	PLANTCITY FL	Q49102	512
	E	CHARLESTO SC	8/1/2002 03:20 AM	CSX Transportation	Arrival	PLANTCITY FL	F75031	511
	E	HAMLET NC	8/1/2002 02:46 AM	CSX Transportation	Arrival	PLANTCITY FL	Q49431	510
	E	FLORENCE SC	5/31/2002 09:55 PM	CSX Transportation	Departure	PLANTCITY FL	Q49431	509
	E	FLORENCE SC	5/31/2002 08:05 PM	CSX Transportation	Arrival	PLANTCITY FL	F70431	508
	E	CHARLESTO SC	5/31/2002 04:05 PM	CSX Transportation	Departure	PLANTCITY FL	F79431	507
	E	GIANT SC	5/31/2002 12:10 PM	CSX Transportation	Departure	PLANTCITY FL	F75031	506
	E	GIANT SC	5/31/2002 12:00 PM	CSX Transportation	Pull	PLANTCITY FL	F75031	505
	E	CHARLESTO SC	5/31/2002 08:35 AM	CSX Transportation	Arrival	PLANTCITY FL	F75031	504
	E	GIANT SC	5/30/2002 10:06 PM	CSX Transportation	Departure	PLANTCITY FL	F75030	503
	E	GIANT SC	5/30/2002 10:00 PM	CSX Transportation	Pull	PLANTCITY FL	F75030	502
	E	GIANT SC	5/30/2002 08:59 PM	CSX Transportation	Released	PLANTCITY FL		501
	E	GIANT SC	5/29/2002 02:38 PM	CSX Transportation	Released	PLANTCITY FL		500
	L	GIANT SC	5/11/2002 07:30 AM	CSX Transportation	Const Place	GIANT SC		499
	L	GIANT SC	5/10/2002 12:36 PM	CSX Transportation	Actual Place	GIANT SC	F75010	498
	L	GIANT SC	5/10/2002 12:30 PM	CSX Transportation	Arrival Destin	GIANT SC	F75010	497
	L	SEVENMILE SC	5/10/2002 10:15 AM	CSX Transportation	Departure	GIANT SC	F75010	496
	L	CHARLESTO SC	5/10/2002 07:43 AM	Norfolk Southern	Jct Delivery	GIANT SC		494
	L	SEVENMILE SC	5/10/2002 07:43 AM	CSX Transportation	Jct Recv	GIANT SC		495
	L	CHARLESTO SC	5/9/2002 08:02 AM	Norfolk Southern	Arrival	GIANT SC	337	493
	L	GADSDEN YSC <N/A>	5/9/2002 08:02 AM	Norfolk Southern	Departure	GIANT SC	337	492
	L	COLUMBIA SC	5/9/2002 05:35 AM	Norfolk Southern	Departure	GIANT SC	337	491
	L	COLUMBIA SC	5/8/2002 08:44 PM	Norfolk Southern	Arrival	GIANT SC	337	490
	L	BLITHEWOODY SC <N/A>	5/8/2002 08:14 PM	Norfolk Southern	Departure	GIANT SC	337	489
	L	ROCHILL SC	5/8/2002 06:40 PM	Norfolk Southern	Departure	GIANT SC	337	488
	L	ROCHILL SC	5/8/2002 04:28 PM	Norfolk Southern	Arrival	GIANT SC	337	487
	L	FORTMILL YSC <N/A>	5/8/2002 04:08 PM	Norfolk Southern	Departure	GIANT SC	337	486
	L	LINWOOD NC	5/8/2002 01:17 PM	Norfolk Southern	Departure	GIANT SC	337	485
	L	LINWOOD NC	5/7/2002 01:25 PM	Norfolk Southern	Arrival	GIANT SC	172	484
	L	CHARLOTTE NC	5/7/2002 11:20 AM	Norfolk Southern	Departure	GIANT SC	172	483
	L	SOLITE NC	5/6/2002 03:47 PM	Norfolk Southern	Released	UNKNOWN	RELS	482
	L	CHARLOTTE NC	5/6/2002 12:06 PM	Norfolk Southern	Jct Recv	UNKNOWN		481
	L	CHARLOTTE NC	5/6/2002 12:06 PM	ACWR	Jct Delivery	HARLEYVIL SC		480
	E	SOLITE NC	5/2/2002 05:12 PM	ACWR	Released	UNKNOWN		479
					Actual Place	NORWOOD NC		478

AUG 28 2002 16:5

HP LASERJET 3200

Train ID Set Set

PLMX 002818	L	AQUADALE NC	2/15/2002 09:15 AM	ACWR	Const Place	NORWOOD NC		477
	L	NORWOOD NC	2/12/2002 08:55 PM	ACWR	Jct Recv	NORWOOD NC		478
	L	NORWOOD NC	2/12/2002 08:55 PM	CSX Transportation	Jct Delivery	NORWOOD NC		475
	L	NORWOOD NC	2/12/2002 08:48 PM	CSX Transportation	Arrival Destin	NORWOOD NC	221212	474
	L	WADESBORO NC	2/12/2002 07:15 PM	CSX Transportation	Arrival	NORWOOD NC	F70112	473
	L	HAMLET NC	2/12/2002 05:35 PM	CSX Transportation	Departure	NORWOOD NC	F70112	472
	L	HAMLET NC	2/11/2002 08:11 AM	CSX Transportation	Released	NORWOOD NC		471
	L	HAMLET NC	2/11/2002 08:10 AM	CSX Transportation	Arrival	NORWOOD NC	Q49210	470
	L	FLORENCE SC	2/11/2002 03:00 AM	CSX Transportation	Departure	NORWOOD NC	Q49210	468
	L	FLORENCE SC	2/10/2002 08:05 PM	CSX Transportation	Arrival	NORWOOD NC	Q49210	468
	L	EASSAVANN GA	2/10/2002 12:30 PM	CSX Transportation	Departure	NORWOOD NC	Q49210	467
	L	EASSAVANN GA	2/10/2002 08:15 AM	CSX Transportation	Arrival	NORWOOD NC	Q49210	468
	L	WAYCROSS GA	2/10/2002 04:20 AM	CSX Transportation	Departure	NORWOOD NC	Q49210	465
	L	WAYCROSS GA	2/8/2002 12:40 PM	CSX Transportation	Arrival	NORWOOD NC	Q85209	464
	L	BALDWIN FL	2/8/2002 08:15 AM	CSX Transportation	Departure	NORWOOD NC	Q65209	463
	L	BALDWIN FL	2/8/2002 08:00 AM	CSX Transportation	Arrival	NORWOOD NC	Q85209	462
	L	TAMPA FL	2/8/2002 01:55 AM	CSX Transportation	Departure	NORWOOD NC	Q86209	461
	L	TAMPA FL	2/7/2002 10:55 PM	CSX Transportation	Pull	NORWOOD NC	Y22407	460
	L	TAMPA FL	2/6/2002 07:47 AM	CSX Transportation	Released	NORWOOD NC	020206	459
	L	TAMPA FL	2/6/2002 03:40 PM	CSX Transportation	Released	NORWOOD NC		458
	L	TAMPA FL	1/24/2002 05:18 PM	CSX Transportation	Released	NORWOOD NC		457

009918-000002

**NON-HAZARDOUS
WASTE MANIFEST**

1. Generator's US EPA ID No.

FLD 065680613

Manifest
Document No.
00021552. Page 1
of 1

IPC/MAGNUM-PLANT CITY

3. Generator's Name and Mailing Address

IPC/MAGNUM PLANT CITY
105 S ALEXANDER ST
PLANT CITY FL 33566
813-754-1504

4. Generator's Phone ()

5. Transporter 1 Company Name

IPC/MAGNUM PLANT CITY

7. Transporter 2 Company Name

CSX

9. Designated Facility Name and Site Address

GIANT CEMENT
HWY SOUTH CAROLINA 453/I-26
HARLEYVILLE SC 29448

6. US EPA ID Number

FLD 065-680 613

8. US EPA ID Number

FLD006421340

10. US EPA ID Number

SCD003351699

A. Transporter's Phone

813-754-1504

B. Transporter's Phone

904-633-1673

C. Facility's Phone

12. Containers

No.

Type

13. Total
Quantity14. Unit
Wt/Vol

001

TT

1081

G

11. Waste Shipping Name and Description

a. COMBUSTIBLE LIQUIDS, N.O.S., N.A.1993, PGIII
(CONTAINS: USED OIL)

b.

c.

d.

D. Additional Descriptions for Materials Listed Above

OFF SPEC USED OIL

E. Handling Codes for Wastes Listed Above

PROFILE 11a: 01108

PROFILE 11b: _____

PROFILE 11c: _____

PROFILE 11d: _____

15. Special Handling Instructions and Additional Information

I CERTIFY THAT THIS MATERIAL IS REGULATED AS USED OIL AS
DEFINED IN 40 CFR 279 AND 62-710 F.A.C. THIS MATERIAL DOES
NOT CONTAIN AND NEVER HAS BEEN MIXED WITH ANY HAZARDOUS
WASTE'S. (INITIALS) _____ FOR EMERGENCY CALL 1-800-424-9300CHLORINE SCREENING METHOD: < THAN 1000 PPM HALOGEN BEPPER
< THAN 1000 PPM DEXSIL KIT

16. GENERATOR'S CERTIFICATION: I certify the materials described above on this manifest are not subject to federal regulations for reporting proper disposal of Hazardous Waste.

Printed/Typed Name

Signature

Month Day Year

Stephanie Stephens

Stephanie Stephens

10/10/02

17. Transporter 1 Acknowledgement of Receipt of Materials

Printed/Typed Name

Signature

Month Day Year

William Spitzer Sr

William Spitzer Sr

10/10/02

18. Transporter 2 Acknowledgement of Receipt of Materials

Printed/Typed Name

Signature

Month Day Year

19. Discrepancy Indication Space

20. Facility Owner or Operator: Certification of receipt of waste materials covered by this manifest except as noted in Item 19.

MO# 009918-000002

Month Day Year

GIANT CEMENT

Signature

Printed/Typed Name

ORIGINAL - RETURN TO GENERATOR

GENERATOR

TRANSPORTER

FACILITY

D.E.P.
SEP 23 2002
HILLSBOROUGH
Southwest
of Tampa

Div: 010 IPC/MAGNUM PLANT CITY TERR: STOP: Wk: Strt: Rpts: PAGE 01

Work Order#: 009918-000002 BOBB Cust No: 000000025034
 Printed : 12/30/2001 Sched: 00/00/0000 GIANT CEMENT
 Terms : NET 10 Time: 00:00 P O BOX 218
 Truck Num: HARLEYVILLE SC 29448
 Salesman : 710 PLANT CITY HOUSE ACCOUNT US
 Cust. PO#:

=====Site Information=====Generator Information=====

IPC/MAGNUM PLANT CITY	IPC/MAGNUM PLANT CITY
105 S ALEXANDER ST	105 S ALEXANDER ST
PLANT CITY FL 33566	PLANT CITY FL 33566
HILLSBOROUGH 813-754-1504	HILLSBOROUGH 813-754-1504

=====DESTINATION=====

GIANT CEMENT	HWY SOUTH CAROLINA 453/I-26
HARLEYVILLE SC 29448	800-637-4023

===== Work Description =====

ONE LOAD OF OIL DELIVERED TO RAILCAR# PLMX 2818

TYPE Manifest	BOL#	Product Description	Product Desig	Rte.
OIL 0082155		USED OIL	0110B	OUT

Equip	Description	Technician	Quantity	UM	*- A C T U A L -*	
					Rate	Cost
0110B	USED OIL	<i>Philip</i>	1681	GA		

Manifest#: _____ Manifest#: _____ AMOUNT DUE---> _____

DESCRIPTION OF WORK COMPLETED: _____

Owner/agent further agrees to be responsible for all costs of collection, including reasonable attorney's fees and charged the maximum interest rate permitted by law on invoices past due 30 days or longer. Upon acceptance, please sign and approve quote. Final cost may vary based on job completion.

Stephen Stephens
 Owner or Agent of Owner



5040

18620 LB

Friday 08:13 04JAN02

681

13580 LB

Friday 09:32 04JAN02

TRUCK I.D. IPC 13
(TRAILER I.D.)

() ON
DRIVER (X) OFF

AUDIT I.D.# 3559 Stephen Tyler
(QUALIFIED WEIGHER)

NON-HAZARDOUS WASTE MANIFEST

009918-000004

1. Generator's US EPA ID No.

FLD 065600613

Manifest
Document No.
0004551

2. Page 1
of 1

IPC/MAGNUM-PLANTCITY

3. Generator's Name and Mailing Address

IPC/MAGNUM PLANT CITY
105 S ALEXANDER ST
PLANT CITY
813-754-1504

4. Generator's Phone ()

FL 33566

5. Transporter 1 Company Name

IPC/MAGNUM PLANT CITY

6. US EPA ID Number

FLD 065-680 613

7. Transporter 2 Company Name

CSX

8. US EPA ID Number

FLD006421340

9. Designated Facility Name and Site Address

GIANT CEMENT
HWY SOUTH CAROLINA 453/I-26
HARLEYVILLE SC 29448

10. US EPA ID Number

SCD003351699

11. Waste Shipping Name and Description

a. COMBUSTIBLE LIQUIDS, N.O.S., N.A.1993, PGIII
(CONTAINS: USED OIL)

12. Containers

No.

Type

13.
Total
Quantity

14.
Unit
Wt/Vol

001

TT

619

G

b.

c.

d.

D. Additional Descriptions for Materials Listed Above

E. Handling Codes for Wastes Listed Above

PROFILE 11a: 0110B

PROFILE 11b:

PROFILE 11c:

PROFILE 11d:

15. Special Handling Instructions and Additional Information

I CERTIFY THAT THIS MATERIAL IS REGULATED AS USED OIL AS
DEFINED IN 40 CFR 279 AND 62-710 F.A.C. THIS MATERIAL DOES
NOT CONTAIN AND NEVER HAS BEEN MIXED WITH ANY HAZARDOUS
WASTE'S. (INITIALS) FOR EMERGENCY CALL 1-800-424-9300

CHLORINE SCREENING METHOD: < THAN 1000 PPM HALOGEN BEEPER
< THAN 1000 PPM DEXSIL KIT

16. GENERATOR'S CERTIFICATION: I certify the materials described above on this manifest are not subject to federal regulations for reporting proper disposal of Hazardous Waste.

Printed/Typed Name

Ron de Montmoulin

Signature

Ron de Montmoulin

Month Day Year

01/21/02

17. Transporter 1 Acknowledgement of Receipt of Materials

Printed/Typed Name

Ron de Montmoulin

Signature

Ron de Montmoulin

Month Day Year

01/21/02

18. Transporter 2 Acknowledgement of Receipt of Materials

Printed/Typed Name

Stephanie Stephens

Signature

Stephanie Stephens

Month Day Year

1/21/02

19. Discrepancy Indication Space

20. Facility Owner or Operator: Certification of receipt of waste materials covered by this manifest except as noted in Item 19.

GIANT CEMENT

Printed/Typed Name

Signature

NO# 009918-000004

Month Day Year

ORIGINAL - RETURN TO GENERATOR

Div: 010 IPC/MAGNUM PLANT CITY TERR: STOP: Wk: Strt: Rpts: PAGE 0

Work Order#: 009918-000004 BOBB Cust No: 000000025034
Printed : 01/20/2002 Sched: 00/00/0000 GIANT CEMENT
Terms : NET 10 Time: 00:00 P O BOX 218
Truck Num: FL-92 Rod HARLEYVILLE
Salesman : 710 PLANT CITY HOUSE ACCOUNT US SC 29448
Cust. PO#:

=====Site Information=====Generator Information=====
IPC/MAGNUM PLANT CITY IPC/MAGNUM PLANT CITY
105 S ALEXANDER ST 105 S ALEXANDER ST
PLANT CITY FL 33566 PLANT CITY FL 33566
HILLSBOROUGH 813-754-1504 HILLSBOROUGH 813-754-1504
=====DESTINATION=====

GIANT CEMENT HWY SOUTH CAROLINA 453/I-26
HARLEYVILLE SC 29448 800-637-4023

===== Work Description =====
ONE LOAD OF OIL DELIVERED TO RAILCAR# PLMX 2818

TYPE Manifest	BOL#	Product Description	Product Desig	Rte
OIL	0084551	USED OIL	0110B	OU

Equip	Description	Technician	Quantity	UM	*- A C T U A L -*
					Rate Cost
0110B	USED OIL	<i>R. de M...</i>	615.00	GA	

Manifest#: _____ Manifest#: _____ AMOUNT DUE--->

DESCRIPTION OF WORK COMPLETED: *Pumped off front tank*

Owner/agent further agrees to be responsible for all costs of collection, including reasonable attorney's fees and charged the maximum interest rate permitted by law on invoices past due 30 days or longer. Upon acceptance, please sign and approve quote. Final cost may vary based on job completion.

Stephen Stephens
Owner or Agent of Owner



4580

17940 LB

Monday 08:14 21 JAN 02

619

13360 LB

Monday 08:54 21 JAN 02

TRUCK I.D. IPC 3870
(TRAILER I.D.)

DRIVER ☒ ON ☐ OFF

AUDIT I.D.# FL92 Ulewanick
(QUALIFIED WEIGHER)

NON-HAZARDOUS WASTE MANIFEST

009918-000007

1. Generator's US EPA ID No.

FLD 065680613

Mani.
Document No.
0005120

2. Page 1
of 1

IPC/MAGNUM-PLANTCITY

3. Generator's Name and Mailing Address

IPC/MAGNUM PLANT CITY
105 S ALEXANDER ST
PLANT CITY
813-754-1504

4. Generator's Phone ()

FL 33566

5. Transporter 1 Company Name

IPC/MAGNUM PLANT CITY

6.

US EPA ID Number

FLD 065-680 613

7. Transporter 2 Company Name

CSX

8.

US EPA ID Number

FLD006421340

9. Designated Facility Name and Site Address

GIANT CEMENT
HWY SOUTH CAROLINA 453/I-26
HARLEYVILLE SC 29448

10.

US EPA ID Number

SCD003351699

HILLSBOROUGH

A. Transporter's Phone

813-754-1504

B. Transporter's Phone

904-633-1673

C. Facility's Phone

11. Waste Shipping Name and Description

12. Containers
No. Type

13. Total
Quantity

14. Unit
Wt/Vol

a. COMBUSTIBLE LIQUIDS, N.O.S., N.A.1993, PGIII
(CONTAINS: USED OIL)

001

TT

622

G

b.

c.

d.

D. Additional Descriptions for Materials Listed Above

E. Handling Codes for Wastes Listed Above

PROFILE 11a: 0110B

PROFILE 11b:

PROFILE 11c:

PROFILE 11d:

15. Special Handling Instructions and Additional Information

I CERTIFY THAT THIS MATERIAL IS REGULATED AS USED OIL AS
DEFINED IN 40 CFR 279 AND 62-710 P.A.C. THIS MATERIAL DOES
NOT CONTAIN AND NEVER HAS BEEN MIXED WITH ANY HAZARDOUS
WASTE'S. (INITIALS) FOR EMERGENCY CALL 1-800-424-9300

CHLORINE SCREENING METHOD: < THAN 1000 PPM HALOGEN BEEPER
< THAN 1000 PPM DEXSIL KIT

16. GENERATOR'S CERTIFICATION: I certify the materials described above on this manifest are not subject to federal regulations for reporting proper disposal of Hazardous Waste.

Printed/Typed Name

DAVID BELL

Signature

David Bell

Month Day Year

11/25/02

17. Transporter 1 Acknowledgement of Receipt of Materials

Printed/Typed Name

DAVID BELL

Signature

David Bell

Month Day Year

11/25/02

18. Transporter 2 Acknowledgement of Receipt of Materials

Printed/Typed Name

Stephanie Stephens

Signature

Stephanie Stephens

Month Day Year

11/25/02

19. Discrepancy Indication Space

20. Facility Owner or Operator: Certification of receipt of waste materials covered by this manifest except as noted in Item 19.

GIANT CEMENT

Printed/Typed Name

Signature

NO# 009918-000007

Month Day Year

11/25/02

ORIGINAL - RETURN TO GENERATOR

Div: 010 IPC/MAGNUM PLANT CITY TERR: STOP: Wk: Strt: Rpts: PAGE 0

Work Order#: 009918-000007 BOBB Cust No: 000000025034
Printed : 01/25/2002 Sched: 00/00/0000 GIANT CEMENT
Terms : NET 10 Time: 00:00 P O BOX 218
Truck Num: HARLEYVILLE SC 29448
Salesman : 710 PLANT CITY HOUSE ACCOUNT US
Cust. PO#:

=====Site Information=====Generator Information=====
IPC/MAGNUM PLANT CITY IPC/MAGNUM PLANT CITY
105 S ALEXANDER ST 105 S ALEXANDER ST
PLANT CITY FL 33566 PLANT CITY FL 33566
HILLSBOROUGH 813-754-1504 HILLSBOROUGH 813-754-1504
=====DESTINATION=====
GIANT CEMENT HWY SOUTH CAROLINA 453/I-26
HARLEYVILLE SC 29448 800-637-4023

===== Work Description =====
ONE LOAD OF OIL DELIVERED TO RAILCAR# PLMX 2818

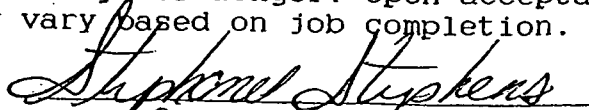
TYPE Manifest	BOL#	Product Description	Product Desig	Rte
OIL 0085120		USED OIL	0110B	OU'

Equip	Description	Technician	Quantity	UM	*- A C T U A L -*
					Rate Cost
0110B	USED OIL		622	GA	

Manifest#: _____ Manifest#: _____ AMOUNT DUE---> _____

DESCRIPTION OF WORK COMPLETED: _____

Owner/agent further agrees to be responsible for all costs of collection, including reasonable attorney's fees and charged the maximum interest rate permitted by law on invoices past due 30 days or longer. Upon acceptance, please sign and approve quote. Final cost may vary based on job completion.


Owner or Agent of Owner



18060 LB

Friday 14:37 25JAN02

13460 LB

Friday 16:49 25JAN02

TRUCK I.D.

JPC

FL90

(TRAILER I.D.)

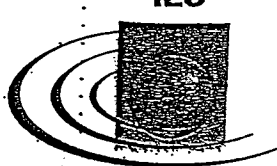
DRIVER

() ON
(X) OFF

AUDIT/I.D.#

4056

Michael Steiner
(QUALIFIED WEIGHER)



International
Environmental Services, Inc.
an EarthLiquids Company

BEST AVAILABLE COPY

CERTIFIED ANALYSIS

105 S. Alexander Str
Plant City, FL 33566
(800)282-9585
(813)754-1504
(813)754-3789 Fax

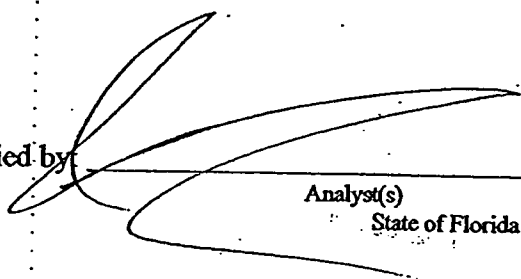
CLIENT INFORMATION

CLIENT NAME: IPC, GARRY ALLEN
CLIENT SAMPLE ID: PLMX 2818
SAMPLED BY: Steve Harris
SAMPLE DATE: 1/31/02
SAMPLE TIME: 11:00hrs
SAMPLE TYPE: Used Oil
IES CONTROL NUMBER: 02-0135

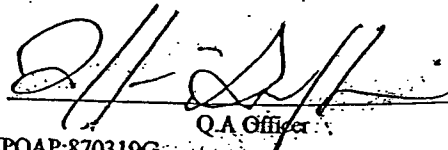
RESULT INFORMATION

ANALYTE	METHOD	DATE ANALYZED	RESULTS	MDL*	UNITS
ARSENIC	EPA-6010B	02/04/02	0.745	0.3	mg/Kg
BARIIUM	EPA-6010B	02/04/02	17.7	0.05	mg/Kg
CADMIUM	EPA-6010B	02/04/02	0.047	0.04	mg/Kg
COPPER	EPA-6010B	02/04/02	13.0	0.1	mg/Kg
CHROMIUM	EPA-6010B	02/04/02	0.479	0.03	mg/Kg
LEAD	EPA-6010B	02/04/02	3.95	0.03	mg/Kg
MANGANESE	EPA-6010B	02/04/02	0.4937	0.05	mg/Kg
SILVER	EPA-6010B	02/04/02	BDL	0.05	mg/Kg

MDL*: METHOD DETECTON LIMIT
BDL: BELOW DETECTION LIMIT

Certified by: 

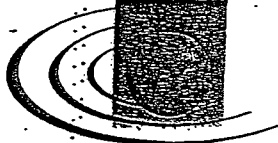
Analyst(s)

Certified by: 

Q.A. Officer

State of Florida Certification: E84160

COMPQAP:870319G



International
Environmental Services, Inc.
an EarthLiquids Company

105 S. Alexander Street
Plant City, FL 33566
(800)282-9585
(813)754-1504
(813)754-3789 Fax

CERTIFIED ANALYSIS

CLIENT INFORMATION

CLIENT NAME:	IPC- PLANT CITY
CLIENT SAMPLE ID:	PLMX 2818
SAMPLED BY:	Steve Harris
SAMPLE DATE:	01/31/02 11:00am
SAMPLE TYPE:	Used oil
IES CONTROL NUMBER:	02-0135

RESULT INFORMATION

ANALYTE	METHOD	Date Analyzed	RESULTS	MRL*	UNITS
Aroclor 1016	EPA-608	02/04/02	BRL	2.00	mg/Kg
Aroclor 1221	EPA-608	02/04/02	BRL	2.00	mg/Kg
Aroclor 1232	EPA-608	02/04/02	BRL	2.00	mg/Kg
Aroclor 1242	EPA-608	02/04/02	BRL	2.00	mg/Kg
Aroclor 1248	EPA-608	02/04/02	BRL	2.00	mg/Kg
Aroclor 1254	EPA-608	02/04/02	BRL	2.00	mg/Kg
Aroclor 1260	EPA-608	02/04/02	BRL	2.00	mg/Kg

0.500 ppm Aroclor 1260 QA/QC Standard: 95.3% recovery
MRL*: METHOD REPORTING LIMIT
BRL: BELOW REPORTING LIMIT

Certified by: _____

Analyst(s)

State of Florida Certification: E84160

Certified by: _____

COMPQAP:870319G

Q.A Officer



105 S. Alexander Stre
Plant City, FL 33566
(800)282-9585
(813)754-1504
(813)754-3789 Fax

CERTIFIED ANALYSIS

CLIENT INFORMATION

CLIENT NAME:
CLIENT SAMPLE ID:
SAMPLED BY:
SAMPLE DATE & TIME:
SAMPLE TYPE:
IES CONTROL NUMBER:

IPC-PLANT CITY
PLMX 2818
Steve Harris
01/31/02 11:00am
Used oil
02-0135

RESULT INFORMATION

Dilution Factor: 1:10,000

ANALYTE	METHOD #	ANALYSIS DATE	RESULTS	MRL	UNITS
FREON 113	EPA-8021B	02/06/02	BRL	10.00	mg/Kg
Allyl Chloride	EPA-8021B	02/06/02	BRL	10.00	mg/Kg
Methyl-tert-butyl-ether	EPA-8021B	02/06/02	BRL	10.00	mg/Kg
Chloroprene	EPA-8021B	02/06/02	BRL	10.00	mg/Kg
2,2-dichloropropane	EPA-8021B	02/06/02	BRL	10.00	mg/Kg
Benzene	EPA-8021B	02/06/02	63.01	10.00	mg/Kg
Toluene	EPA-8021B	02/06/02	441.3	10.00	mg/Kg
Ethylbenzene	EPA-8021B	02/06/02	99.19	10.00	mg/Kg
M & P-Xylene	EPA-8021B	02/06/02	313.7	10.00	mg/Kg
O-Xylene	EPA-8021B	02/06/02	130.7	10.00	mg/Kg
1,2,3-trichloropropane	EPA-8021B	02/06/02	BRL	10.00	mg/Kg
1,1,1,2-tetrachloroethane	EPA-8021B	02/06/02	BRL	10.00	mg/Kg
Isopropylbenzene	EPA-8021B	02/06/02	BRL	10.00	mg/Kg
n-propylbenzene	EPA-8021B	02/06/02	BRL	10.00	mg/Kg
bromobenzene	EPA-8021B	02/06/02	13807	10.00	mg/Kg
2-chlorotoluene	EPA-8021B	02/06/02	BRL	10.00	mg/Kg
4-chlorotoluene	EPA-8021B	02/06/02	BRL	10.00	mg/Kg
Tert-butylbenzene	EPA-8021B	02/06/02	BRL	10.00	mg/Kg
1,2,4-trimethylbenzene	EPA-8021B	02/06/02	5231	10.00	mg/Kg
1,3,5-trimethylbenzene	EPA-8021B	02/06/02	303.2	10.00	mg/Kg
Sec-butylbenzene	EPA-8021B	02/06/02	BRL	10.00	mg/Kg
p-isopropyltoluene	EPA-8021B	02/06/02	20.57	10.00	mg/Kg
n-butylbenzene	EPA-8021B	02/06/02	BRL	10.00	mg/Kg
1,2,4-trichlorobenzene	EPA-8021B	02/06/02	106.4	10.00	mg/Kg
1,2,3-trichlorobenzene	EPA-8021B	02/06/02	BRL	10.00	mg/Kg
Naphthalene	EPA-8021B	02/06/02	BRL	10.00	mg/Kg
Methyl Ethyl Ketone	EPA-8021B	02/06/02	139.2	10.00	mg/Kg
Hexachlorobutadiene	EPA-8021B	02/06/02	112.0	10.00	mg/Kg
			BRL	10.00	mg/Kg

4-bromochlorobenzene surrogate: 109.2% recovery
MRL*: METHOD REPORTING LIMIT
BRL: BELOW REPORTING LIMIT

60ppb HVOC QA/QC standard: 89.4% recovery

Certified by: _____

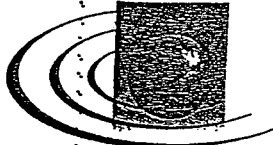
Analyst(s)

Certified by: _____

Q.A. Officer

State of Florida Certification: E84160

COMPQAP:870319G



International
Environmental Services, Inc.
an EarthLiquids Company

BEST AVAILABLE COPY

CERTIFIED ANALYSIS

105 S. Alexander Street
Plant City, FL 33566
(800)282-9585
(813)754-1504
(813)754-3789 Fax

CLIENT INFORMATION

CLIENT NAME:
CLIENT SAMPLE ID:
SAMPLED BY:
SAMPLE DATE & TIME:
SAMPLE TYPE:
IES CONTROL NUMBER:

IPC-PLANT CITY
PLMX 2818
Steve Harris
01/31/02 11:00am
Used oil
02-0135

RESULT INFORMATION

Dilution Factor: 1:10,000

ANALYTE	METHOD #	ANALYSIS DATE	RESULTS	MRL	UNITS
Dichlorodifluoromethane	EPA-8021B	02/04/02	BRL	10.00	mg/Kg
Chloromethane	EPA-8021B	02/04/02	BRL	10.00	mg/Kg
Vinyl Chloride	EPA-8021B	02/04/02	BRL	10.00	mg/Kg
Bromomethane	EPA-8021B	02/04/02	BRL	10.00	mg/Kg
Chloroethane	EPA-8021B	02/04/02	BRL	10.00	mg/Kg
Trichlorofluoromethane	EPA-8021B	02/04/02	BRL	10.00	mg/Kg
1,1-Dichloroethene	EPA-8021B	02/04/02	BRL	10.00	mg/Kg
Methylene Chloride	EPA-8021B	02/04/02	BRL	10.00	mg/Kg
trans-1,2-Dichloroethene	EPA-8021B	02/04/02	BRL	10.00	mg/Kg
1,1-Dichloroethane	EPA-8021B	02/04/02	BRL	10.00	mg/Kg
cis-1,2-Dichloroethene	EPA-8021B	02/04/02	BRL	10.00	mg/Kg
Chloroform	EPA-8021B	02/04/02	BRL	10.00	mg/Kg
1,1,1-Trichloroethane	EPA-8021B	02/04/02	BRL	10.00	mg/Kg
Carbon tetrachloride	EPA-8021B	02/04/02	BRL	10.00	mg/Kg
1,2-Dichloroethane	EPA-8021B	02/04/02	BRL	10.00	mg/Kg
Trichloroethene	EPA-8021B	02/04/02	25.51	10.00	mg/Kg
1,2-Dichloropropane	EPA-8021B	02/04/02	BRL	10.00	mg/Kg
Bromodichloromethane	EPA-8021B	02/04/02	BRL	10.00	mg/Kg
2-chloroethylvinyl ether	EPA-8021B	02/04/02	BRL	10.00	mg/Kg
cis-1,3-Dichloropropene	EPA-8021B	02/04/02	BRL	10.00	mg/Kg
trans-1,3-Dichloropropene	EPA-8021B	02/04/02	BRL	10.00	mg/Kg
1,1,2-Trichloroethane	EPA-8021B	02/04/02	BRL	10.00	mg/Kg
Tetrachloroethene	EPA-8021B	02/04/02	576.8	10.00	mg/Kg
Dibromochloromethane	EPA-8021B	02/04/02	BRL	10.00	mg/Kg
Chlorobenzene	EPA-8021B	02/04/02	BRL	10.00	mg/Kg
Bromoform	EPA-8021B	02/04/02	BRL	10.00	mg/Kg
1,1,2,2-Tetrachloroethane	EPA-8021B	02/04/02	BRL	10.00	mg/Kg
1,3-Dichlorobenzene	EPA-8021B	02/04/02	BRL	10.00	mg/Kg
1,4-Dichlorobenzene	EPA-8021B	02/04/02	BRL	10.00	mg/Kg
1,2-Dichlorobenzene	EPA-8021B	02/04/02	BRL	10.00	mg/Kg

4-bromochlorobenzene surrogate: 110.4% recovery

MRL*: METHOD REPORTING LIMIT

BRL: BELOW REPORTING LIMIT

60ppb HVOC QA/QC standard: 108.8% recovery

Certified by:

TG

Analyst(s)

Certified by:

Q.A. Office

State of Florida Certification: E84160

COMPQAP: 870319G

ENFORCEMENT/COMPLIANCE COVER MEMO

TO: ☐ Deborah A. Getzoff, Director of District Management

FROM/THROUGH: *WJ* William Kutash, Environmental Administrator
SCT Stanley Tam, Program Manager
AK Elizabeth Knauss, Environmental manager
AG Al Gephart, Engineer IV
JD Jim Dregne, Environmental Specialist III

DATE: July 23, 2002

FILE NAME: International Petroleum Corporation

PROJECT #: 256531

PROGRAM: Hazardous Waste

COUNTY: Hillsborough

TYPE OF DOCUMENT:

☐ Draft or ☒ Final ☐ NOV ☐ Consent Order
☐ Final Order ☐ Case Report ☐ Penalty Authorization
☒ Warning Letter ☐ Other:

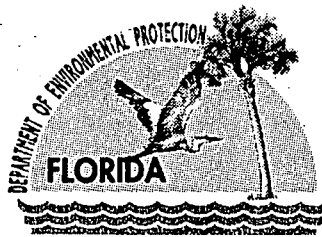
DESCRIPTION OF VIOLATIONS:

Failure to operate the facility in a manner that minimizes the possibility of a release of hazardous constituents, failure to properly mark containers of used oil filters, failure to seal containers of used oil filters, failure to document field testing results for halogens and failure to submit an exception report, within 45 days of the date a waste is accepted by the transporter, if a signed manifest sheet is not returned by the destined TSD facility.

SUMMARY OF CORRECTIVE ACTIONS:

The facility is to provide the Department with the complete records of waste shipments on manifests #82155, #85120 and #84551 and provide a description of actions to ensure all halogen testing by its drivers is documented in the daily records.

PENALTY SUMMARY: N/A



Jeb Bush
Governor

Department of Environmental Protection

Southwest District
3804 Coconut Palm Drive
Tampa, Florida 33619

David B. Struhs
Secretary

August 6, 2002

Mr. Garry R. Allen
International Petroleum Corporation
105 South Alexander Street
Plant City, FL 33566

RE: International Petroleum Corporation
EPA ID# FLD 065 680 613
Warning Letter #256531
Hillsborough County

Dear Mr. Allen:

The purpose of this letter is to advise you of possible violations of law for which you may be responsible, and to seek your cooperation in resolving the matter. A hazardous waste program field inspection conducted on March 20, 2002, indicates that violations of Florida Statutes and Rules may exist at the above referenced facility. Department of Environmental Protection personnel made observations described in the attached inspection report. Section 10 of the report lists a summary of alleged violations of Department Rules.

Section 403.727, Florida Statutes (F.S.) provides that it is a violation to fail to comply with rules adopted by the Department. The activities observed during the Department's field inspection and any other activities at your facility that may be contributing to violations of Florida Statutes or Department Rules should cease.

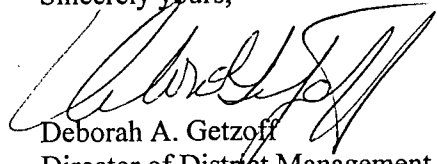
You are requested to respond in writing within thirty (30) days with documentation that all alleged violations have been corrected. Alternatively, you may contact Mr. Al Gephart at (813) 744-6100, extension 372, within fifteen (15) days of receipt of this Warning Letter to arrange a meeting to discuss this matter. The Department is interested in reviewing any facts you may have that will assist in determining whether any violations have occurred. You may bring anyone with you to the meeting that you feel could help resolve this matter.

Please be advised that this Warning Letter is part of an agency investigation, preliminary to agency action in accordance with Section 120.57(4), F.S. In accordance with the United States Environmental Protection Agency's (EPA) RCRA Civil Penalty Policy of 1990, the penalties which could be assessed in hazardous waste cases are up to \$25,000 per day per violation. If this matter cannot be resolved within 90 days, under the Department's agreement with the United States Environmental Protection Agency (EPA),

14 DAY EXTENSION
GRANTED BY J. DREBNE
ON Aug 27, 2002

a formal administrative complaint or "Notice of Violation" (NOV) must be issued against you within 150 days of the date of the attached inspection report. We look forward to your cooperation in completing the investigation and resolution of this matter.

Sincerely yours,



Deborah A. Getzoff
Director of District Management
Southwest District

DAG/afg

Enclosure

cc: Steven Ray, HWR Section, FDEP, Tallahassee
Bill Parker, HWR Section, FDEP, Tallahassee
Kelley Boatwright, Hillsborough EPC
Compliance File



Jeb Bush
Governor

Department of Environmental Protection

Southwest District
3804 Coconut Palm Drive
Tampa, Florida 33619

David B. Struhs
Secretary

HAZARDOUS WASTE INSPECTION REPORT

1. INSPECTION TYPE: ☒ Routine ☐ Complaint ☐ Follow-Up ☒ Permitting ☐ Pre-Arranged

FACILITY NAME: International Petroleum Corporation DEP/EPA ID #: FLD 065 680 613

STREET ADDRESS: 105 South Alexander Street, Plant City, FL 33566

MAILING ADDRESS: 105 South Alexander Street, Plant City, FL 33566

COUNTY: Hillsborough PHONE: (813) 754-1504 DATE: 03/20/02 TIME: 9:40 am

NOTIFIED AS: ☐ N/A

CURRENT STATUS:

- ☐ non-handler
- ☐ CESQG (<100 Kg per month)
- ☐ SQG (100 Kg - 1000 Kg per month)
- ☐ LQG (>1000 Kg per month)
- ☒ transporter
- ☐ transfer facility
- ☐ interim status TSDF
- ☐ permitted TSDF
- ☐ unit types:
- ☐ exempt treatment facility
- ☒ used oil: Processor, Transporter, Marketer
- ☒ used oil filter: Processor, Transporter

- ☐ non-handler
- ☐ CESQG (<100 Kg per month)
- ☐ SQG (100 Kg - 1000 Kg per month)
- ☒ LQG (>1000 Kg per month)
- ☒ transporter
- ☐ transfer facility
- ☐ interim status TSDF
- ☐ permitted TSDF
- ☐ unit types:
- ☐ exempt treatment facility
- ☒ used oil: Processor, Transporter, Marketer
- ☒ used oil filter: Processor, Transporter

2. APPLICABLE REGULATIONS:

- | | | | |
|--|---|--|--------------------------------------|
| <input type="checkbox"/> 40 CFR 261.5 | <input checked="" type="checkbox"/> 40 CFR 262 | <input checked="" type="checkbox"/> 40 CFR 263 | <input type="checkbox"/> 40 CFR 264 |
| <input checked="" type="checkbox"/> 40 CFR 265 | <input type="checkbox"/> 40 CFR 266 | <input checked="" type="checkbox"/> 40 CFR 268 | <input type="checkbox"/> 40 CFR 273 |
| <input checked="" type="checkbox"/> 40 CFR 279 | <input checked="" type="checkbox"/> 62-710, FAC | <input type="checkbox"/> 62-737, FAC | <input type="checkbox"/> 62-740, FAC |

3. RESPONSIBLE OFFICIAL:

Garry Allen - President

4. INSPECTION PARTICIPANTS:

Al Gephart - FDEP
Jim Dregne - FDEP

Garry Allen - IPC
Stanley Tam - FDEP

5. LATITUDE/LONGITUDE: 28°00'30"/ 82°08'00"

6. SIC Code: 2999

7. TYPE OF OWNERSHIP: PRIVATE FEDERAL STATE COUNTY MUNICIPAL

8. PERMIT #: 93015-HO06-001 ISSUE DATE: 08/20/98 EXP. DATE: 08/20/03

"More Protection, Less Process"

Printed on recycled paper.

9. PROCESS DESCRIPTION:

International Petroleum Corporation (IPC) is a used oil processor and marketer of on-spec used oil. IPC produces a fuel oil that is equivalent to No. 5 Fuel Oil and a flotation oil for the phosphate industry. The IPC eight-acre site contains an oil re-refinery facility, an industrial wastewater pre-treatment facility, storage tanks, maintenance garage and two administration buildings. According to Mr. Allen, the facility does not intentionally accept off-spec used oil or hazardous waste. On occasion, IPC may act as a broker for the disposal of hazardous waste for some clients or receive used oil that it must manage as hazardous waste because they are not able to rebut the presumption. The hazardous waste that is brokered is not transported by IPC, but is transported directly from the generator to the disposal facility. The used oil that is managed as hazardous is normally transported by IPC tanker to Safety Kleen-24th Avenue in Tampa.

The IPC tank farm consists of 27 aboveground storage tanks. Seventeen (17) of these tanks (approximate capacity of 1,397,600 gallons) are used to store used and re-refined used oil. The tanks have secondary containment consisting of concrete walls and floor designed to contain oil spills. Overall, the containment areas were clean and in good condition. Extra care should be taken to ensure that the secondary containment area in the product tank farm, next to the rail spur is kept clean.

Used oil and petroleum contaminated products, including off-spec virgin fuels, are processed into an on-spec used oil fuel using a multi-stage distillation system. Water that is distilled from the used oil is pretreated in the company's wastewater treatment plant prior to being discharged to the Plant City POTW. The light distillates from the distillation process are burned on-site in the Born hot oil furnace to provide thermal energy for the re-refinery process. The Born furnace is operated under a FDEP Air Permit. The containment in this area was clean and in good condition.

The majority of the used oil, used oil filters and oily wastes are brought into the facility by tanker trucks owned by IPC, common carriers, independent oil transporters and tanker rail cars. A rail spur is located along the south side of the facility. Used oil delivered by rail only stays at the facility for a few days depending on the time it is staged at the spur. The spur has a small containment curb running parallel to the rails that provides some secondary containment capacity for small spills and leaks for rail cars staged at the spur. In the rail car unloading area, there was a hose that was possibly leaking used oil. In addition, the area was very dirty and "oily". Facility personnel were advised to check the hoses. In the future, employees should place the hoses on the grating or in a bucket to contain leaks or drips of used oil, and improve on the housekeeping in the area.

Used oil arriving at the facility is sampled and analyzed in the facility's on-site laboratory, using a Dohrmann MC120/130 analyzer before it is off loaded from any truck or rail car. If the analysis indicates the total halogen concentration is less than 1,000 ppm, the used oil is accepted and pumped into the tank farm. Used oil containing 1000 ppm or more total halogens is presumed to be hazardous. The used oil may be accepted if a rebuttable presumption is made or if not, is rejected. The truck drivers use a sniffer to check the total halogens at customer facilities prior to picking up the used oil. The truck drivers log the results of these analyses on the bill of lading or manifest. A review of these used oil pickup receipts for the period October 1, 2001 to March 29, 2002, showed that some drivers were not recording all sniffer test results on all receipts. Failure to maintain records of information used to determine if the used oil is above or below 1,000-ppm halogens is a violation of 40 CFR 279.44(d). A document review of used oil analyses conducted at the facility between October 1, 2001 and March 20, 2002, showed eleven samples that had used oil exceeding 1000-ppm halogen content. Seven of these loads were successfully rebutted. Shipments that could not be rebutted were either rejected or handled as hazardous waste.

Used oil, oily water or used antifreeze from tanker trucks are first pumped through a 40-mesh filter basket to remove silts and other solids before they enter any tank in the tank farm. The filtered material is pumped to a 630,000-gallon aboveground storage tank, T-630. The tank was properly labeled, "Used Oil". Used oil from tank T-630 is fed by aboveground piping to the processing area where it is processed through an atmospheric distillation column and a vacuum distillation column. The re-refined oil is then transferred to tank 30KV. Normally, the re-refined oil in tank 30KV is transferred to tank 552 once per day. The processed oil in tank 552 is sampled and tested to determine if the processed used oil meets the used oil fuel specifications. If the used oil meets the specifications, it is released by IPC for shipment to, or is further blended for, its customers. Water distilled from the used oil is pumped to tanks SKW and SKE.

Crushed and uncrushed used oil filters are received in 55-gallon drums and stored in a drum storage area adjacent to the maintenance building. At the time of the inspection, there were two (2) drums of used oil filters next to the Administration Office that were not properly labeled and one was missing the bung. This is a violation of 62-710.850(6)(a), FAC. Following the inspection, IPC instituted a procedure that made drivers inspect all crushed filter drums prior to being off loaded from trucks to insure that labels and bungs were on each drum. IPC does not regularly crush filters at the Plant City facility but on occasions, may perform crushing operations. The uncrushed filters are shipped to Fort Pierce for crushing. Crushed filters are smelted at the U.S. Foundry in Medley, Florida. Next to the used oil filter crusher is a 250 gallon tank used to contain the used oil from the crushing of filters. The facility has secondary containment for the tank, but the secondary containment contained used oil. Mr. Allen was advised that he must keep the secondary containment clean.

Crushed used oil filters were also stored in totes behind the solid waste transfer area. The labels on the totes were faded and illegible. The condition of the totes was also questionable. Specifically, oil appeared to be leaking from the seams on one of the totes. These are violations of 62-710.850(6)(a), FAC. Facility personnel put new labels on the totes, removed them and shipped them off-site during the inspection.

Empty 55-gallon drums are collected in a drum washing area located at the west end of the product oil tank farm. The drums are pressure washed with water. Diesel fuel or kerosene is used to "cut" the oil. The oily waste from the drum cleaning operation drains to a sump next to the wash area. The oily waste is then pumped from the sump, via aboveground piping, to T-630. If the waste generated at the wash area is water, a valve can be used to route the wastewater to tanks SKE and SKW.

Wastewater, including petroleum contact water (PCW), industrial wastewater, rainwater collected in secondary containment areas and water distilled from the re-refining of used oil is accumulated in two 47,000 gallon aboveground storage tanks SKE and SKW. The wastewater is treated in a pre-treatment system consisting of gravity separation, chemical treatment, flocculation, coagulation and dissolved air flotation. Any oil recovered from the tanks by gravity separation or dissolved air flotation is pumped to T-630 for re-refining. Following pre-treatment of the wastewater, the water is discharged to the Plant City POTW.

Used antifreeze is placed in a separate compartment in the tanker trucks. When the truck arrives at IPC the used antifreeze is transferred to T-630 for processing with the used oil or it may be pumped to tank 20V (or alternate tanks) for recycling. The destination of the incoming used antifreeze is dependent on the glycol content of the antifreeze. Antifreeze containing greater than 30% glycol (high value glycol) typically goes to tank 20V. IPC stores the antifreeze in tank 20V until it has enough to fill a rail car. Rail cars of used antifreeze are shipped to the Magnum - Ft. Pierce facility for recycling. Antifreeze with low glycol value normally goes to T-630. According to Mr. Allen, IPC requires a hazardous waste

determination be made prior to the acceptance of any used antifreeze that is not destined for recycling. A separate waste determination is necessary for each facility. A review of IPC's records showed that each client providing antifreeze to IPC had a TCLP analysis performed for four contaminants of concern; benzene, lead, trichloroethene and tetrachloroethene. Any client's antifreeze that tests hazardous is not accepted by IPC.

Solid waste managed at the facility includes oily solid waste generated by IPC and its clients. Oil contaminated solid waste is picked-up by IOS as a service to its clients. The solid waste handled by IPC includes filter basket debris, sludge absorbents, contaminated soil and rags. The waste is managed as non-hazardous waste. The solid wastes are bulked and sent to an approved thermal facility or a licensed landfill for disposal.

A large amount of the solid waste generated by IPC comes from the cleaning of lint traps and sumps. The Company has done extensive testing of these waste streams. The analyses from these tests indicate that the waste is non-hazardous. A review of the records at IPC for the previous twelve months showed that the lint trap and sump waste had been managed properly.

Before the processed oil is shipped off-site, a composite sample is collected from tank 552 using the All-levels sampling procedure or, depending on tank level, a sample may be drawn from a six-foot high sample port. The sample is taken to the facility's on-site laboratory for analysis. If the analytical results indicate that the processed oil meets the on-spec criteria, the oil is released for shipment or further blending. Re-refined oil may be blended or stored in tanks 1, 2, 3, 4, 5, 6, 7, 8, 9, 10, 11, 12, 20V or 24K with other virgin fuels to make a variety of different fuel blends to meet customer demands. An inspection of the analytical results indicated that the re-refined oil meets the specification for No. 5 Fuel Oil and the on-spec criteria listed in 40 CFR 279.11.

Incoming and outgoing manifests for used oil, used oil filters, crushed oil filters, petroleum contact water and antifreeze are kept by IPC for at least three years. Records for the previous eight months were reviewed for completeness and accuracy. The facility did not have the returned manifest sheets for three manifests (#82155, #85120 and #84551). Failure to submit an Exception Report to the EPA Regional Administrator for the Region within 45 days of the date the waste was accepted by the transporter is a violation of **40 CFR 262.42(a)(2)**. There was one shipment of hazardous waste (11-21-01) from the laboratory since the last compliance inspection. The manifest was filled-out properly.

The Company had copies of its current registrations (dated 8-17-01) for used oil transporter, processor and marketer, and used oil filter transporter, transfer facility and processor. IPC asked for an extension of time to submit its 2001 report. The extension was granted and the 2001 report was submitted.

Fire extinguishers at the facility are being serviced annually. The last service date was July 2001. The fire and emergency equipment are inspected monthly. The facility is equipped with spill kits consisting of absorbents, blankets and booms. Inspection records from June 4, 2001, thru March 15, 2002, were reviewed and found to be complete.

IPC employees receive training as outlined in the company's "Used Oil Training and Certification Manual". The company's truck drivers are provided driver training and an orientation program. All personnel are to receive annual refresher training. The last annual refresher training was conducted on May 4,7,8,14,15 and September 15, 2001.

The records of six drivers were reviewed upon their return to the facility. Each driver was maintaining an updated copy of his driver's license, medical certification and training documents. Each vehicle was equipped with a functioning sniffer.

10. SUMMARY OF ALLEGED VIOLATIONS:

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| 40 CFR 262.42 | Failure to submit an Exception Report to the Department when a return copy of the manifest with the handwritten signature of the owner or operator of the designated facility has not been received within 45 days of shipment. |
| 40 CFR 279.44(d) | Failure to maintain records of analyses or information used to determine if used oil being picked-up has above or below 1,000-ppm halogens. |
| 62-710.850(6)(a), FAC | Failure to properly seal and label containers of used oil filters. <i>(Repeat)(Corrected)</i> |

11. RECOMMENDATIONS:

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| 40 CFR 262.42 | Effective immediately, IPC shall provide the Department with all documentation involving the shipment of the waste cited in manifests #82155, #85120 and #84551. Documentation must include the return manifests and any documents involving the tracing of the shipment by IPC. |
| 40 CFR 279.44(d) | Effective immediately, IPC shall provide the Department with a description of the actions taken to ensure that drivers are documenting the test results for halogens prior to picking-up a customer's used oil. |

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