

ATTACHMENT 2
PROCESS DESCRIPTION

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Cliff Berry Incorporated (CBI) provides used oil transportation and disposal for a range of clients from independent gas stations to multinational oil companies. The process and procedures are identical for all clients. Upon request from the client the material is profiled, including notification to the client that we do not pick up materials with halogens above 1,000 parts per million (ppm). CBI uses separate trucks to pick-up Used Oil, Bunker Oil, Oily Water and PCW and CBI does not co-mingle oil and PCW in the same truck. Upon arrival at the client site the driver samples the used oil for halogens. If halogens are found the material is refused and the company is notified. If the material passes the halogens test it is pumped into the truck and manifested to a CBI transfer facility, directly to the CBI Miami Facility or an approved third party. If sent to the transfer facility it is stored within the permit limits then manifested to the CBI Miami Facility or other approved facility for processing. Use of storage is often necessary to ensure quick turnaround for clients with multiple loads or it allows for the accumulation of smaller loads into a cost effective load to the CBI Miami Facility or other approved facility. No processing occurs at the CBI transfer facilities except for gravity separation that occurs naturally as the material waits to be transported to the CBI Miami Facility or other approved facility. No additives, nor heating, are used to aid in gravity separation.

The following process description is consistent with the CBI Waste Analysis Plan which answers the questions as to "analysis, treatment, storage or other processing, beginning with the arrival of an incoming shipment to the departure of an outgoing shipment." The Miami Facility has a lab and all testing is performed with professional laboratory instruments. The pick-up of waste streams is coordinated in advance and those waste streams for which generator knowledge or process knowledge is used to profile the waste, a phone call is initiated with the generator to discuss the origin and process from which the waste is generated so that a proper profile can be developed.

Used Oil

A representative sample of the used oil will be collected and tested for halogens at each client location prior to pick-up using a sniffer (initially) or a Q1000 test kit (if warranted by a high reading on the sniffer). If the test results are <1000 ppm for halogens the load is allowed to be managed by CBI. Only used oil will be loaded into Used Oil designated tanks and kept separated from PCW tanks. As noted above all loads of used oil are eventually transported to the CBI Miami Facility and upon arrival a representative sample is brought to the lab for the following tests to be performed prior to offloading of the waste or by product. The Miami Facility lab will perform several tests including water by distillation, treatability, halogens, flash point, solids content and PCB scan when applicable. After all testing has been performed to ensure that it meets the approved profile the used oil load will then be offloaded in Miami. Approval will be given to the Miami Facility offload technician, offload manager and/or oil processing manager to accept the load into the facility. All loads not meeting the approved profile's criteria must be reported to the Facility Manager immediately. The Facility Manager will contact either the sales manager or the generator directly to discuss the problem with acceptance of the waste stream. If it is confirmed that the facility cannot treat and process the waste stream, the load will be rejected.

The requested permit modification does not change the current operations of the Miami Facility. The modification includes installation of four additional process tanks of approximately 30,000 gallon capacity each, totaling approximately 120,000 gallons of total storage. A downstream filtration system will be added to the current processing technology to further clean the finished used oil product.

Petroleum Contact Water (PCW)

Only PCW will be loaded into PCW designated tanks and kept separated from Used Oil tanks. As noted above loads of PCW may be transported to the CBI Miami Facility or an approved third party disposal facility. If placed into storage at a CBI facility the technician will test for pH to ensure the material is non-hazardous for pH. If taken to the Miami Facility, upon arrival a representative sample is brought to the Miami Facility lab for the following tests to be performed prior to offloading of the waste or by product. The lab may perform several tests including, pH, water by distillation, treatability, halogens, flash point, solids content and PCB scan when applicable. After all testing has been performed to ensure that it meets the approved profile the PCW load will then be offloaded. Approval will be given to the offload technician, offload manager and/or oil processing manager to accept the load into the facility. All loads not meeting the approved profile's criteria must be reported to the Facility Manager immediately. The Facility Manager will contact either the sales manager or the generator directly to discuss the problem with acceptance of the waste stream. If it is confirmed that the facility cannot treat and process the waste stream, the load will be rejected.

Grit Trap/Sump Waste

The Miami Facility uses a grit trap as a crude filter to drop out sand and other solids prior to pumping Used Oil into a permitted storage tank. The volume of material build-up is proportional to the amount of oil and cleaned as required. The sludge is typically placed into 55 gallon steel drums for disposal. Prior to disposal a representative sample of the grit trap/sump waste will be collected and analyzed using TCLP and EPA test methods 8240 and 8260. Based upon the results of testing arrangements will be made for appropriate disposal.

Table #1
Vertical Tanks

| Tank # | Date Installed | Size (Gallons) | Material of Construction | Products |
|-------------|----------------|----------------|--------------------------|--------------------------|
| 01 (AG) | 1946 | 126,000 | Steel | Used Oil |
| 02 (AG) | 1946 | 126,000 | Steel | Used Oil |
| 03 (AG) | 1946 | 126,000 | Steel | Oily Water |
| 04 (AG) | 1946 | 126,000 | Steel | Oily Water |
| 05 (AG) | 1946 | 126,000 | Steel | Oily Water |
| 06 (AG) | 1946 | 126,000 | Steel | Oily Water |
| 07 (AG) | 1946 | 126,000 | Steel | Used Oil |
| 10A (AG) | 2015 | 44,000 | Steel | Clean Water |
| 10B (AG) | 2015 | 44,000 | Steel | Clean Water |
| 11A (AG) | 2015 | 50,000 | Steel | Finished Product |
| 11B (AG) | 2015 | 50,000 | Steel | Finished Product |
| 12A (AG) | 2015 | 50,000 | Steel | Used Oil |
| 12B (AG) | 2015 | 50,000 | Steel | Used Oil |
| 26 | TBD | 29,000 | Steel | Used Oil |
| 27 | TBD | 29,000 | Steel | Used Oil |
| 28 | TBD | 29,000 | Steel | Used Oil |
| 29 | TBD | 29,000 | Steel | Distillate |
| Mixing Tank | 1965 | 4,000 | Steel | Used for mixing Products |

Horizontal Tanks

| Tank # | Date Installed | Size (Gallons) | Material of Construction | Products |
|----------|----------------|----------------|--------------------------|-------------|
| 13H (AG) | 1965 | 19,500 | Steel | Oily Water |
| 14 (AG) | 1965 | 19,500 | Steel | Oily Water |
| 15 (AG) | 1965 | 19,500 | Steel | Oily Water |
| 16 (AG) | 1965 | 17,600 | Steel | Diesel Fuel |
| 17 (AG) | 1965 | 17,600 | Steel | PCW |
| 18 (AG) | 1965 | 17,400 | Steel | Oily Water |
| 19 (AG) | 1965 | 17,400 | Steel | Oily Water |
| 20 (AG) | 1965 | 17,600 | Steel | Used Oil |
| 21 (AG) | 1965 | 17,600 | Steel | Used Oil |
| 22 (AG) | 2009 | 25,000 | Steel | Used Oil |
| 23 (AG) | 2009 | 25,000 | Steel | Used Oil |
| 24 (AG) | 2009 | 25,000 | Steel | Used Oil |
| 25 (AG) | 2009 | 25,000 | Steel | Used Oil |