From:
 hjasph

 To:
 Choi, Juchan

 Cc:
 Winston, Kathy

Subject: Re: Notification of failure to follow up on compliance requests - H&J Asphalt Inc. FLD984205765

Date: Thursday, February 18, 2016 10:13:36 AM

Attachments: <u>20160218100944065.pdf</u>

20160218092641217.pdf

Mr. Choi.

Please see attached all manifest bills from May 2015 through January 2016. Please keep in mind that they come out every 3 to 4 months. I have also included the approved analysis report for US Lubricants.

Any additional questions please feel free to contact us via email. We are finishing up with the cleaning and I soon as I have the pictures I will send over to you. Thank you for your time.

Regards,

Jorge Lorenzo

On Wednesday, February 17, 2016 5:20 PM, "Choi, Juchan" < Juchan. Choi@dep.state.fl.us> wrote:

Good afternoon Lilly,

Please note that the non-compliance letter with request of corrective action was given to your facility on the day of inspection.

Used oil burner requirements is specified in 40 CFR 279, Subpart G. The tracking requirement in the 40 CFR 279.65 says, "Used oil burners must keep a record of each used oil shipment accepted for burning. These records may take the form of a log, invoice, manifest, bill of lading, or other shipping documents."

The records must be maintained for at least three years and must include for each shipment the following information:

- Name, address and FDEP/EPA identification number of the transporter who delivered the used oil to the burner;
- Name, address and FDEP/EPA identification number (if applicable) of the used oil generator, processor or marketer from whom the used oil was received:
- Quantity of used oil accepted
- Date of acceptance of the used oil.

The documents you have provided to us on the day of inspection were portion of manifest showing used oil acceptance, ship out and other clean-ups. Provided documents were time between July, 2014 and January, 2015. I am requesting you to provide to the department all manifest records for the year 2015 (January – December).

According to state of Florida Administrative Code 62-710.510 "Record Keeping and Reporting" states that "each registered person shall maintain records on DEP Form 62-710.901 or on substantially equivalent forms which contain at least the same information as the Department form." And 62-710.510(1)(c) specifies that the total number of gallons of used oil received from each source, including any oily wastes which may be an integral part of the used oil shipment must be documented.

You are required to establish a log for disposer from the parts washer being added to used oil and the record must be kept for at least 3 years. Please use attached file "62-710.901 Used Oil and Used Oil Filter Record Keeping Form" to establish log and send us a copy.

Please proceed all other requests concerning violation and send photos retuned in compliance. Try to compete these requests by March 2nd, send us everything you have by this date. If you still need more time, please let me know. We will need to discuss your circumstances. Thank you.

Jay,

From: hjasph [mailto:hjasph@bellsouth.net]
Sent: Wednesday, February 17, 2016 10:00 AM

To: Choi, Juchan **Cc:** Winston, Kathy

Subject: Re: Notification of failure to follow up on compliance requests - H&J Asphalt Inc.

FLD984205765

Good morning Mr. Choi,

We are in receipt of your email. We never received any emails in regards what we needed to clean until yesterday 2/16/2016. We are requesting an extension of time to be able to clean out all areas properly. If you have any additional questions please feel free to call us. This email has been forward to our Plant QC for proper handling. I also want to remind you that we submitted documents to yourself that same day you came for the inspection. What other documents are you needing

On Tuesday, February 16, 2016 5:39 PM, "Choi, Juchan" < Juchan. Choi@dep.state.fl.us > wrote:

Dear Mr. Jorge Lorenzo,

This is Jay Choi with Department of Environmental Protection. Introducing myself, I joined FDEP's Hazardous Waste program in last July. Inspector Kathy Winston and I have visited your facility site H & J Asphalt Inc. for a follow up inspection to ensure that the previous violations are corrected and inspection recommendations are carried out as expected. However, during follow-up inspection we have noted number of deficiencies and observed the same violations as before.

The following items were discussed at the time of inspection:

- Several major and minor used oil spills or used oil staining spots were still visible as they were observed from last inspection. Please promptly address these spills in the area. Also establish a container for dirty oil dry.
- Inspector observed a spot of antifreeze spill and several used oil spilled areas. Please promptly address these spills in the area.
- The shop had one 30-gallon parts washer that contained diesel fuel. Next to the parts washer, three 5-gallon buckets and two non-measurable buckets were placed without proper closure. These buckets were unlabeled but filled with used oil. Please label any transfer pans and buckets for used oil
- In the asphalt production area, a place where appeared to be control area located between baghouse and supply oil tank, there were heavy equipment system with motor pump, heater, and control panel installed approximately 1 ft. above the ground. A strong evidence of notable oil leaks on the pump area was found, two 5-gallon buckets were placed underneath the pump. Both buckets were full of oil and rest were overflowing onto the ground created spill size of approximately 1 sq. yd. Please promptly address these spills in the area address the area where used oil pipes being leaked and ensure that no release occurs.
- A 5,000-gallon black used oil supplier tank labeled #3 was located south of control area. An inspector observed the leakage in the pipe joints and found a 5-gallon bucket filled with oily water in full. Please promptly address these spills in the area address the area where used oil pipes being leaked and ensure that no release occurs.
- Another 5,000-gallon used oil tank contained with secondary containment was located little further south to the first observed 5,000-gallon black used oil supplier tank labeled #3. An oil leak was observed where the pipe is connected. There was area where three 5-gallon buckets contained with small amounts of used oil, it

appeared to be buckets had been placed to capture leaks from equipment and hoses. Please promptly address these spills in the area address the area where used oil pipes being leaked and ensure that no release occurs.

- Oil tanker truck labeled 947 was placed in opposite side of asphalt production area along the west fenced wall. There was evidence showing oil leaks from the top of oil tanker, which created a small puddle beneath the tanker. Behind the tanker truck had five 5-gallon buckets and one black 55-gallon drum containing oily water. Please promptly address these spills in the area and remove the five 5-gallon bucks and one black 55-gallon drum of oily water behind the same tanker.
- There was a location where trucks unload asphalt materials in the area between secondary containment for 5,000-gallon used oil tank and the tanker truck on east facility fence. Inspectors observed approximately 2 x 5 ft. paved pit area in front of the conveyor belt filled with oily liquid inside. Please pump out the pit in front of conveyor belt.
- East entrance along the fence line, there was pile of oily rags left on the ground. Please remove pile of oily lags next the back gate and properly dispose it. Please provide a copy of receipts for proper disposal.
- During review of Hazardous Waste document, the facility could not provide recent used oil acceptance log and parts washer disposal log. The facility has provided copies of manifest for the time between July, 2014 and January, 2015. But rest of records were unable since January 23, 2015. Please provide the Department with records the facility has pertaining to the used oil that has been accepted in the year 2015.
- The facility was unable to provide disposal records for the parts washer being added to used oil. Please establish a log for disposer from the parts washer being added to used oil.

** Please to provide all copies of document and photos returned in compliance.

During exit interview, all mentioned above were notified to facility personnel Mr. Marvin Mondragon (operations plant manager) to provide all copies of document and photos returned in compliance within the 21 days response time provided (by 1/6/2016). The time has passed more than a month now for the due. The department still hasn't received any documents nor photos returned in compliance. Mr. Lorenzo, please understand that the Department noted identical violations found during two consecutive inspections and are identified as repeats. This is a failure to prevent the recurrence of violation. I would like to help you with my best to resolve these matter. Please understand it is time for you to actively involve and resolve these issues beforehand. Please promptly respond this email by end of this week (2/21/2016). If you need to request extension of time or have any concern or question please let me know. I look forward to your response. Thank you.

Jay,

Juchan (Jay) Choi Florida Department of Environmental Protection Southeast District Office 3301 Gun Club Road MSC 7210-1 West Palm Beach, FL 33406 Phone: (561)681.6632







EMC Oil Corporation

P.O. Box 520882 - Miami, FL 33152

Toll Free (800) 344-8688



UNIFORM WASTE TRANSPORTERS MANIFEST

NO HAZARDOUS MIXTURES ACCEPTED - READ BOTTOM OF MANIFEST



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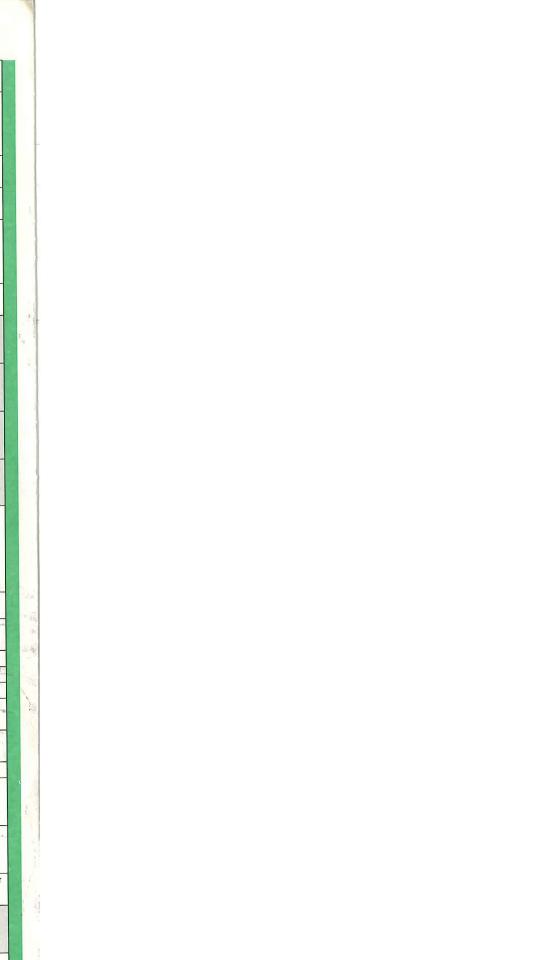
Dear Generator: The following chemicals contain hazardous substances which when mixed with used oil reduces the recycling potential and can cause harmful effects to the environment.

DO NOT MIX WITH USED OIL

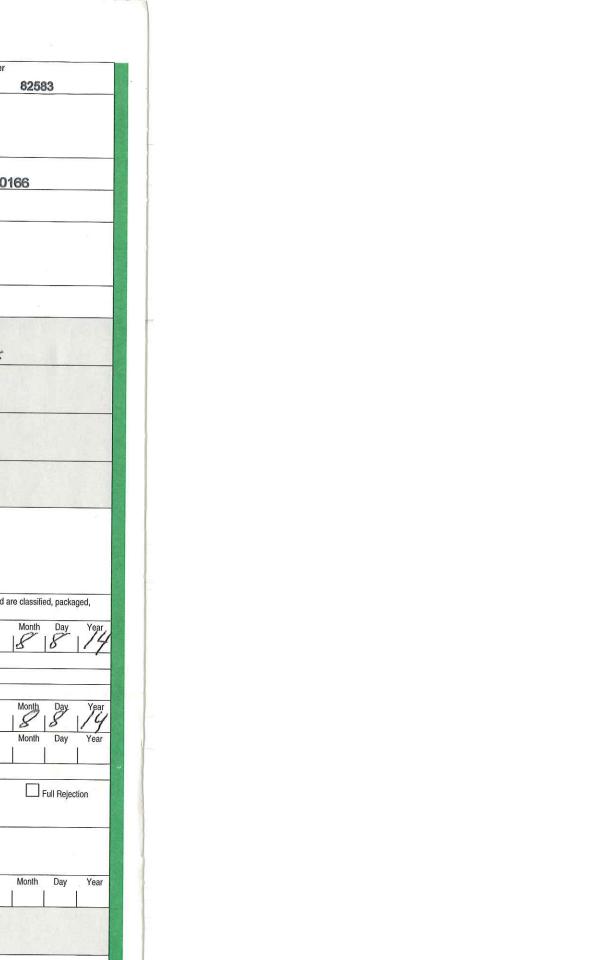
Antifreeze - Freon - Solvents - Thinner - Degreasers - Detergents - Cleaners - Radiator Fluid - Leaded Gasoline - Cutting Oil

CAN MIX WITH USED OIL

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Dade (305) 477-7497

EMC Oil Corporation

P.O. Box 520882 - Miami, FL 33152

Toll Free (800) 344-8688



UNIFORM WASTE TRANSPORTERS MANIFEST NO HAZARDOUS MIXTURES ACCEPTED - READ BOTTOM OF MANIFEST



	1.0	Generator's Name and Mailing Address PO#		A Manifort Desame	
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		4310 NW 35 AVE, MIAM! FL 33142 Generator's Phone (305) 635-8110 County of Origin	(DADE)	EPA STATE	
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Dear Generator: The following chemicals contain hazardous substances 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 WITH USED OIL
Motor Oil - Diesel Fuel - Grease - Brake Fluids - Hydraulic Fluids - Transmission Fluids

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EMC Oil Corporation

P.O. Box 520882 - Miami, FL 33152

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UNIFORM WASTE TRANSPORTERS MANIFEST

NO HAZARDOUS MIXTURES ACCEPTED - READ BOTTOM OF MANIFEST



	Generator's Name and Mailing Address Generator's Phone ()	PO# County of Orig	do 1 h	x1/	A. Manifes B. Genera EPA	tor's ID #'	1497	15	
	EMC Oil Corporation 8470 N.W. 68th Street, Miami, FL 33166	4. US EPA ID N		3	D. Transpo	orter's Ph	r's ID FLR0000		
	5. Designated Facility Name and Site Address).			F. Facility's	4.4	SW-01124 LW-00227 LW-00233		
	7. Waste shipping & name description HM		8. Conta	Iners Type	9. Total Quantity	10. Unit Wt./Vol	11, Price	G CHAR	GES
	USED OIL								R* C
	USED OIL FILTERS			De		2	4	45	
C	OILY WATER RADIATOR FLUID								
G E N E	NON REG. ABSORBENT MATERIAL								1
R A T	OTHER: SPECIFY					8-			
OR	H. Additional Descriptions for Materials Listed Above	IMPORTANT: Payment A service charge of 1 charged on over 30 de event it shall become herein above sums or a agrees to pay all the re	1/2% (18% per days past due ne necessary any part therec	annum) wi balance in to collect of, the purch	Il be the the Please r	ay on thi	s invoice within	15 days.	
	GENERATOR'S CERTIFICATION: I hereby declare that packed, marked, and labeled, and are all in respects in proper I also confirm that the contents of this consignment contains no its proper disposal under Federal and State Regulations, included.	condition for transport b o hazardous materials. (I	y highway acco n the event tha	ording to app t these prod	olicable internation ucts/material are f	al and natio	nal government re	gulations.	12.
Į.	Printed Typed Name	1010	1	(V	Signature		Mo	onth Day	Year
TRANSPT	13. Transporter 1 Acknowledgment of Receipt of Mate	rials (Signature		V /		Mo	onth Dov	Year
	14. Facility Owner or Operator: Certification of receipt	of waste material or		1	<u> </u>		Mid	onth Day	/ (
FAC-L-HY	Printed Typed Name	o, waste material of	Signature				Mo 	onth Day	Year
1	Below 1000 ppm	Halogen Levels	3			Above 100	00 ppm		

Dear Generator: The following chemicals contain hazardous substances 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 WITH USED OIL

Dade (305) 477-7338

U.S. Lubricant, LLC

3636 N.W. 48th Terrace, Miami, Florida 33142

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	Generator's Name and Mailing Address		DOTTON OF M	ANIFEST	
	PO#		A. Manifest	Document #	
	2. Generator's Phone () County of Orig	jin (B. Generato	r's ID #'s	-15-15 = 02 ATE
	Transporter 1 Company Name 4. US EPA ID	Number			
	U.S. Lubricant, LLC 3636 NW 48th Terrace, Miami, FL 33142	300.000.000.000	C. State Tra	nsporter's ID	205281
	e post	, /	D. Transport	er's Phone	186-229-0146
	1 H 2 T 0 11			New	000 282
_	H310 Nai 35 aug 331	HY	F. Facility's F	מחסחי	
	7. Waste Shipping a Name Description	8. Containers	9.	10. 1	- <i>H177</i> - <i>733</i> \$ 1. Price G
-	HM		Total Quantity	Unit Wt./Vol	CHARGES
	USED OIL	1848.2			CHARGES
G	3				
E	100 m and 100 mm and 1				
N					
E					
R		-			
Α					
Т	H Additional Descriptions for Male			-	
0	H. Additional Descriptions for Materials Listed Above		I. Total Due		
R					
1	 GENERATOR'S CERTIFICATION: I hereby declare that the contents of this corpacked, marked, and labeled, and are all in respects in proper condition for transport. 	nsignment are fully and	accurately describe abo	ove by proper s	higging name and classified
	packed, marked, and labeled, and are all in respects in proper condition for transp I also confirm that the contents of this consignment contains no hazardous materials. (I for its proper disposal under Federal and State Regulations, including any contamination of			ational and national and to be Hazardo	onal government regulations.
F	Printed Typed Name	Signature	illigj.		
_	H&T Asphalt	V		*	Month Day Year
T 1	Transporter 1 Acknowledgment of Receipt of Materials				1/2 10 10
TRANSPT	rinted Typed Name	R	$\vec{\gamma}$		
P ,	Jose' Santill	Signature			Month Day Year
F 1	4. Facility Owner or Operator: Certification of Receipt of Waste Material covered by	by this manifest			12 15 15
. —		y uno manjest.	1-0		
ĪF	rinted Typed Name	Signature /	1-/3	el >	Month Day Year
1 \	Below 1000 ppm Halogen Levels	greek -	FCC		12 15 15
	rialogen Levels		Above 100	0 ppm	
					1

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Dade (305), 477-7497

EMC Oil Corporation

P.O. Box 520882 - Miami, FL 33152

Toll Free (800) 344-8688



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to to the comment of the control of the		1738			st Docum	orte ii	9973	31	
4310 NW 35 AVE, MIAMI FL 33142 2, Generator's Phone (305) 635-8110 County of Origin (DADE)			B. Genera	B. Generator's ID #'s EPA STATE					
Transporter 1 Company Name 4. EMC Oil Corporation	US EPA ID Nu	mber		C, State	Fransporte	r's ID FLR000	00016	6	tira 2 241
8470 N.W. 68th Street, Miami, FL 33166		0000166	r Čv				77-74	197	
o. Designated Facility Name and Site Address						LW-00227 LW-00233			
7 Waste shinning & name description		8 Contai	nere I			11 Price		G	
HM		No.	Туре	Total Quantity	Unit Wt./Vol	TI. FIICE			GES
NON REGUSED OIL FILTERS	F	1) L	.(<-	1/	35.0	0		
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	3.	<u>)</u>)							
			-12) V.	
							12		
A c e h	A service charge of 11/29 charged on over 30 day event it shall become derein above sums or any	% (18% per s past due necessary part thereo	annum) v balance to collect the pure	will be in the ct the chaser	pay on thi	s invoice withi	in 15 d	days.	
packed, marked, and labeled, and are all in respects in proper or I also confirm that the contents of this consignment contains no	ondition for transport by h hazardous materials. (In t	ighway acco	rding to a these pro	pplicable internatio ducts/material are	nal and natio	nal government r	egulatio	ons.	
Printed Typed Name		×	1	Signature	4	N	onth	Day C/	Year
13. Transporter 1 Acknowledgment of Receipt of Materi	als								
Printed Typed Name	- T	Signature	- A.	222		M	lonth	Day	Year
14. Facility Owner or Operator: Certification of receipt o	f waste material cov	ered by th	s manif	est.					
Printed Typed Name		Signature				M	lonth	Day	Year
	To Designated Facility Name and Site Address To Waste shipping & name description NON REG USED OH. FILTERS H. Additional Descriptions for Materials Listed Above 12. GENERATOR'S CERTIFICATION: I hereby declare that the packed, marked, and labeled, and are all in respects in proper of also confirm that the contents of this consignment contains no its proper disposal under Federal and State Regulations, including Printed Typed Name 13. Transporter 1 Acknowledgment of Receipt of Materials Typed Name 14. Facility Owner or Operator: Certification of receipt of the printed Typed Name 15. Designated Facility Name and Site Address 16. Designated Facility Name and Site Address 18. Additional Descriptions for Materials Listed Above 19. Additional D	To Designated Facility Name and Site Address 7. Waste shipping & name description NON REG USED OIL FILTERS H. Additional Descriptions for Materials Listed Above A service charge of 11% charged on over 30 day event it shall become herein above sums or any agrees to pay all the rep 12. GENERATOR'S CERTIFICATION: I hereby declare that the contents of this consignated, marked, and labeled, and are all in respects in proper condition for transport by I also confirm that the contents of this consignment contains no hazardous materials. (in Its proper disposal under Federal and State Regulations, including any contamination cause Printed Typed Name 13. Transporter 1 Acknowledgment of Receipt of Materials Printed Typed Name 14. Facility Owner or Operator: Certification of receipt of waste material coverinted Typed Name	5. Designated Facility Name and Site Address 6. 7. Waste shipping & name description 8. Contain No. NON REG USED OIL FILTERS H. Additional Descriptions for Materials Listed Above A service charge of 1½% (18% per charged on over 30 days past due event it shall become necessary herein above sums or any part thereof agrees to pay all the replaceable cost of the packed, marked, and labeled, and are all in respects in proper condition for transport by highway accollates on the packed, marked, and labeled and are all in respects in proper condition for transport by highway accollates on the packed marked, and labeled and set all in respects in proper condition for transport by highway accollates on the packed marked and set all in respects in proper condition for transport by highway accollates on the packed marked and set all in respects in proper condition for transport by highway accollates the packed marked and set all the packed marked and set all in respects in proper condition for transport by highway accollates the packed marked and set all in respects in proper condition for transport by highway accollates the packed marked and set all in respects in proper condition for transport by highway accollates the packed marked and set all the pa	5. Designated Facility Name and Site Address 6. 7. Waste shipping & name description 8. Containers No. Type NON REG USED OIL FILTERS A service charge of 11/5% (18% per annum) or a service charge	F. Facility T. Waste shipping & name description H. Additional Descriptions for Materials Listed Above No. Type N	6. E. Dade County ID F. Facility's Phone 7. Waste shipping & name description 8. Containers No. Type Total Quantity Wit/Vol NON REG USED OIL FILTERS H. Additional Descriptions for Materials Listed Above A service charge of 11/9/8 (18% per annum) will be charged on over 30 days past due balance in the event that the replaceable cost thereof. 12. GENERATOR'S CERTIFICATION: I hierary dealers that the contents of this consignment contains no hazardous materials, fin the event that these products/material are found to be its proper disposal under Federal and State Regulations, including any contamination caused through commingling.) Printed Typed Name Signature E. Dade County ID F. Facility's Phone In Total Due A service charge of 11/9/8 (18% per annum) will be charged on over 30 days past due balance in the event that the replaceable content thereof. Please pay on this hard the replaceable content thereof. 12. GENERATOR'S CERTIFICATION: I hierary dealers that the contents of this consignment contains no hazardous materials, fin the event that these products/material are found to be its proper disposal under Federal and State Regulations, including any contamination caused through commingling.) Printed Typed Name Signature 14. Facility Owner or Operator: Certification of receipt of waste material covered by this manifest. Printed Typed Name Signature	E. Dade County ID SW-01124 LW-00227 LW-00223 . F. Facility's Phone 7. Waste shipping & name description 8. Containers No. Type Quantity NON REG USED OIL FILTERS 9. 10. 11. Price Quantity NON REG USED OIL FILTERS 1. Total Due Assarce charge of 1195% (1896 per annum) will be charged on over 30 days bad due balance in the event it shall become necessary to collect the here a base to pay all the explanations and national government in also confirm that the contents of this consignment confidence of the system of	E. Dade County ID SW-01124 LW-00237 F. Facility's Phone 7. Waste shipping & name description 8. Containers 9. 10. Unit Wu.Avoi No. Type Quantity Wi.Avoi 11. Price A service charge of 1195% (185% per annum will be charged on over 30 days past due belance in the brewin above sums or any pat thereof, the patchaser agrees to pay all the replaceable cost thereof. 12. GENERATOR'S CERTIFICATION: I hereby declare that the centers of this consignment are fully and accurately developed and received and seed of this consignment are fully according to applicable international and national government regulations to proper condition for transport by highway according to applicable international and national government regulations to proper descriptions or has account the proper designment or fully and secure in the proper designment or fully and condition to the transport by highway according to applicable international and national government regulations to proper designment or fully and secure in the proper designment or fully and secure in the proper design and red deals regulation, including any contamination conditions in hazardous materials. (in the event that these products material are found to be Hazardous, lacecept the proper decided freety) commitment and the Propletion for transport by highway according to applicable international and national government regulations. 9. International and national government regulation in the description of the contents of this consignment confairs to hazardous materials. (in the event that these products material are found to be Hazardous, lacecept the proper description and the description in the description. Fortification of receipt of waste material covered by this manifest. Printed Typed Name Signature Month 1. Total Due 1. Tot	E. Dade County ID SW-01124 LW-00233 F. Facility's Phore 7. Waste shipping & name description 8. Containers 9. Total No. Type Quantity Wt.Vol Annon REG USED OIL FILTERS MPORTANT Payment due upon receipt of involce. A service charge of 1½% (18% per annum) will be to service charge of 1½% (18% per annum) will be to service charge of 1½% (18% per annum) will be to service charge of 1½% (18% per annum) will be to service charge of 1½% (18% per annum) will be to service that all become present to constitute the puchaser agrees to pay all the replaceable cont thereof. 12. GENERATOR'S CERTIFICATION: I hierary deviation that the contents of this consignment are fully not descurably described and service charge in 1½% (18% per annum) will be served to the service charge of 1½% (18% per annum) will be served to the service charge of 1½% (18% per annum) will be served to the service charge of 1½% (18% per annum) will be served to the service charge of 1½% (18% per annum) will be served to the serve

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CAN MIX WITH USED OIL



REFINER

PANAIR LABORATORY.

LABORATORY NO.

5881L

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	_		

OIL ANALYSIS REPORT

Delivered

CUSTOMER TYPE ORIGIN U.S. Lubricants Used Oil Miami, Fl. TEST COMPLETED RECEIVED AT LAB DATE SAMPLED 1/20/16 1/20/16 Not shown

REFINER'S DESIGNATION Processed Lube

SAMPLED FROM Processed Oil

This report relates to the sample tested and does not guarantee the bulk of the material to be of equal

METALS BY EMISSION SPECTROMETRY (D5185) COLOR (D 1500) OR VISUAL (PARTS PER million ELEMENT GRAVITY API @ 60 F (D4052) WEAR METALS SPECIFIC GRAVITY @ 60 F 59 380/193 IRON FLASH POINT COC (D92) ° F/C 1 CHROMIUM FLASH POINT PM (D93) ° F/C 29 MOLYBEDENUM FIRE POINT COC (D92) ° F/C 26 ALUMINUM CARBON RESIDUE % wgt (D189) 11 COPPER 0.764 ASH % wgt (D482) 9 LEAD SULFATED ASH % wgt. (D874) 0 TIN TOTAL ACID No. mg KOH/gm (D974) 0 SILVER TOTAL ACID No. mg KOH/gm (D664) 0 NICKEL TOTAL ACID BASE No. mg KOH/mg (D664) VANADIUM TOTAL BASE No. mg KOH/gm (D5984) TITANIUM VISCOSITY CONTAMINANT METALS CST KINEMATIC (D445) 93 SILICON 37.8 C (100 F) 328 SODIUM 78.139 40 C (104 F) 15 POTASSIUM · 50 C (122 F) BORON 98.9 C (210 F) 11.4 100 C (212 F) ADDITIVE METALS VISCOSITY INDEX (D2270) 113 MAGNESIUM 0.15 WATER BY DISTILLATION % wgt. (D95) 1667 CALCIUM PENTANE INSOLUBLES % wgt (D893) BARIUM PROCEDURE A 721 **PHOSPHORUS** PROCEDURE B (COAGULATED) 476 ZINC

PROCEDURE A

PROCEDURE B (COAGULATED)

TOLUENE INSOLUBLES % wgt. (D893)

BORDERLINE PUMP TEMP ° C (D3829)

BROOKFIELD VISCOSITY @____°C, cP, (D2983)

NITROGEN, % MASS, (K)

PHOSPOROUS, %MASS (D4047)

SAPONIFICATION No., mg KOH/gm (D94) 0.3376

SULPHUR, % MASS, (D4294)

VISCOSITY, (APPARENT), @____°C,cP (D2602)

Water by K. F. % wgt. / ppm

ADDITIONAL TESTS

BTU (D240_)

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19.672	

CARL E. JOHNSON, PRESIDENT

PAL-0190 Issued 8-3-05 Revision 1