

[illegible]

MEETING AGENDA
JANUARY ENVIRONMENTAL SERVICES, FLD982162943
October 27, 2017, 1:00 PM TO 2:30 PM

1. Introductions.

2. Chronology.

02/16/2017 Permit renewal due for Permit Numbers 307171-HO-003 and 307171-SO-002
 (60 days prior to expiration)

04/13/2017 Permit renewal submitted (56 days late)

05/23/2017 Initial inspection site visit - physical site inspection

05/31/2017 Second inspection site visit – records review

07/18/2017 Compliance Assistance Offer Letter issued with the inspection attached.

09/29/2017 Warning Letter #WL17-29HW53SWD issued

3. Non-compliance Issues.

Failure to timely renew permit (Application and fee have been submitted)
72-710.800(4) FAC

2016 and 2017 training & training records not available
62-710.600(2)(b)

Secondary containment not provided for oil trailer storing used oil
279.54(c), CFR

No halogen monitoring device or test kit was in the pump truck (violation of specific condition 45
of the facility permit.)
403.161(1)(b), F.S.

4. Corrective Actions.

Verification of used oil transporter training for each employee for 2016 and 2017;

Disposal receipts for the used oil that was being stored in T-43, which indicates the date and
amount that was hauled off *or* alternatively, photographic evidence that shows that T-43 is now
secondarily contained; and

Proof that all used oil trucks are equipped with halogen monitoring devices or test kits.

5. Settlement of Department Enforcement Action.

Discussion of Consent Order.
Discussion of penalties and costs.

6. Conclusions.

MEETING AGENDA
JANUARY ENVIRONMENTAL SERVICES, FLD982162943
October 27, 2017, 1:00 PM TO 2:30 PM

1. Introductions.

- LJ arrived 1:11 pm & meeting started
- Attendees:
 - FDEP: Kelley Boatwright, Shannon Kennedy, Elizabeth Knauss, Leslie Pedigo
 - Respondent: Loren January Dowart

2. Chronology.

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contained; and

Proof that all used oil trucks are equipped with halogen monitoring devices or test kits.

5. Settlement of Department Enforcement Action.

Discussion of Consent Order.

Discussion of penalties and costs.

6. Conclusions.

- LJ – submit copy of employee training booklet.
- LJ – will send receipt for used oil sludge rolloff from May/June 2017.
- LP – will issue SFCO w/in two weeks.

7. Meeting Notes:

- Meeting start time 1:11pm.
- BK – Intros & opening remarks; overview of mtg; SFO vs LFCO; ELRA vs non-ELRA.
- LJ – No questions at this time.
- BK – Final permit has not been issued yet?
- LJ – Just submitted financial assurance.
- BK – Training documents?
- LJ – Submitted hard copies of training documents for Leonado Torres (4/8/16), J. Cruz Torres
- BK – Date training received?
- LJ – Gave employees booklet/manual to review & used the date the employees completed as the “review date”. LJ will copy & scan the booklet & send it to us.
- BK – Ensure that confidential info is redacted.
- LJ – Understands.
- BK – Tanker status?
- LJ – Old rail car oil was transferred to t-43 and then T-43 was emptied into the tank farm, thus no receipts; the contents were emptied soon after our May 2017 inspection; submitted hard copy of black & white photo of inside of T-43.
- BK – Sludge went where?
- LJ – Roll off for sludge; will provide receipt.
- LJ – Submitted black & white photo of sniffer kit, that is on each truck.
- BK – Back up test kits?
- LJ – One in room; drivers only test or refuse pick up if they think something is fishy.
- BK – Each truck has a kit?
- LJ – No, only truck 15 picks up used oil; the others are vacuum trucks.
- BK – since LJ will submit paperwork receipt showing that sludge was removed, SFCO will suffice; explained penalties & reviewed pen calc
 - Untimely renewal
 - Records existed, but LJ was unable to find; DEP will consider penalty reduction (need copy of training booklet)
 - Secondary containment, serious violation
 - No test kits, corrected, penalty
 - Department costs, went with minimum allowed
- LJ – Halogen sniffer was being used, but her workers said they would transport the used oil first & then use sniffer that was in the lab.
- BK – The one we observed in the lab was clean & did not look like it had been used;
- KB – Sniffer should be used in the field
- BK – Each customers pick up should be checked prior to transport
- LJ – Truck compartmentalized; only do about 2 customers per load so no concern for cross contamination.
- BK – If not field checking, difficult to reject once transported.

- LJ – Told all employees that sniffer must be used in the field & no longer waiting until returning to facility.
- BK – Caucus?
- KB – Anything else for LJ to add?
- LJ – Wiggle room on fees?
- LP – Any further info to mitigate fees will be considered.
- LJ – There are multiple halogen kits on site, just not always used in field.

CAUCUS

- BK – Will not seek a penalty for training as the training records have now been proved. Not using the test kits will be reduce from \$2,000 to \$500 based on failure to comply with rule under 403.121(5); Would like to enter into a SFCO for \$6,500 plus \$250 costs.
- LJ – Agreeable to the \$6,750.
- BK – Alternative is issuing formal NOV, civil settlement; SFCO is more agreeable; overview of SFCO & process; electronic submission & payment due w/in 30.
- LJ – How long does the SFCO take to process?
- LP – Within 2 weeks.
- BK – Who is responsible officer for January Environmental Services, Inc.?
- LJ – I am the Vice president of the corporation & can sign; but will review with Cris Sr. prior to sign; Cris Sr. will possibly sign after review.
- LJ – Do you want copy of book?
- BK – Will review permit & let you know; still need sludge receipts.
- LJ – Will submit receipts & keep eye out for SFCO by mail.

8. Post Enforcement Meeting

- KB – Good faith reduction slight possibility if requested & more info supplied; draft SFCO & get it out.



Florida Department of Environmental Protection

Southwest District Office
13051 North Telecom Parkway, Suite 101
Temple Terrace, FL 33637-0926

Rick Scott
Governor

Carlos Lopez-Cantera
Lt. Governor

Noah Valenstein
Secretary

July 18, 2017

Mr. Cris January, Owner
January Environmental Services, Inc.
1920 State Road 60 West
Bartow, FL 33830
Cris@januaryservices.com

Re: Compliance Assistance Offer
January Environmental Services, Inc.
HW Facility ID #FLD982162943
Polk County

Dear Mr. January:

A Hazardous Waste inspection was conducted at your facility on May 31, 2017. During this inspection, potential non-compliance was noted. The purpose of this letter is to offer compliance assistance as a means of resolving these matters.

Specifically, potential non-compliance with the requirements of Chapter 376 and 403, F.S., Chapter 62-730, Florida Administrative Code (F.A.C.), and Title 40, Code of Federal Regulation (CFR) Parts 262, 265, 279 were observed. Please see the attached inspection report for a full account of Department observations and recommendations.

We request you review the item(s) of concern noted and respond in writing within **15 days** of receipt of this Compliance Assistance Offer. Your written response should include one of the following:

1. Describe what has been done to resolve the non-compliance issue or provide a schedule describing how/when the issue will be addressed.
2. Provide the requested information, or information that mitigates the concerns or demonstrates them to be invalid, or
3. Arrange for the case manager to visit your facility to discuss the item(s) of concern.

It is the Department's desire that you are able adequately address the aforementioned issues so that this matter can be closed. Your failure to respond promptly may result in the initiation of formal enforcement proceedings.

January Environmental Services, Inc.; Facility ID #FLD982162943
Compliance Assistance Offer
Page 2 of 2
July 18, 2017

Please address your response and any questions to Leslie Pedigo of the Southwest District Office at (813)470-5870 or via e-mail at Leslie.Pedigo@dep.state.fl.us . We look forward to your cooperation with this matter.

Sincerely,

A handwritten signature in black ink, appearing to read 'S. Kennedy', written over a horizontal line.

Shannon Kennedy
Interim Environmental Manager
Compliance Assurance Program
Southwest District

SK/lep

Enclosure: Inspection report

ec: Shannon Kennedy, FDEP; Shannon.Kennedy@dep.state.fl.us
Leslie Pedigo, FDEP; Leslie.Pedigo@dep.state.fl.us
SWD_clerical@dep.state.fl.us



**Florida Department of
Environmental Protection
Hazardous Waste Inspection Report**

FACILITY INFORMATION:

Facility Name: January Environmental Services Inc
On-Site Inspection Start Date: 05/23/2017 **On-Site Inspection End Date:** 05/31/2017
ME ID#: 46304 **EPA ID#:** FLD982162943
Facility Street Address: 1920 Hwy 60 W Main St, Bartow, FL 33830-0000
Contact Mailing Address: 1920 Highway 60 West, Bartow, FL 33830
County Name: POLK **Contact Phone:** (863) 534-8478

NOTIFIED AS:

Non-Handler
Used Oil

INSPECTION TYPE:

Routine Inspection for Used Oil Processor facility

INSPECTION PARTICIPANTS:

Principal Inspector: Leslie Pedigo, Inspector
Other Participants: Elizabeth Knauss, Environmental Consultant; Shannon Kennedy, Environmental Specialist II; Cruz Torres, Driver; Loren January, Secretary

LATITUDE / LONGITUDE: Lat 27° 53' 51.5901" / Long 81° 51' 47.2672"

SIC CODE: 4212 - Trans. & utilities - local trucking, without storage

TYPE OF OWNERSHIP: Private

Introduction:

January Environmental Services (January) was inspected to determine the facility's compliance with used oil transporter and transfer facility rules. The facility was originally notified as a small quantity generator on March 25, 1988, under the name Ashland Chemical Company. The 5.18-acre property was sold to January Environmental on October 20, 2004 and the notification was changed to Used Oil Transporter, Transfer Facility, Marketer and Filter Transporter. The company obtained a used oil processor permit (307171-HO-001) on April 16, 2012 due to problems related to storing collected oil more than 35 days. The permit expired April 16, 2017, and January failed to timely file an application to renew the permit. The Department has conducted a number of Hazardous Waste inspections of this facility, most recently on February 20, 2015. Cruz Torres accompanied the inspectors during the facility inspection conducted on May 23, 2017. A follow-up visit was conducted on May 31, 2017; Loren January was available during the second site visit for the paperwork review and to answer additional questions.

Process Description:

January is a used oil, used oil filter and oily waste transporter and processor. The facility does not have full time office employees and there are currently two drivers that work out of this location. The facility picks up waste products from its customers, consolidates and stores the waste and arranges for final treatment and disposal. January does not accept used oil or oily water from other transporters, except for one company that was required to notify as a transporter as it transports more than 55 gallons of self-generated oil at a time. The facility does not collect public used oil.

During the last inspection of the facility conducted on February 20, 2015, it was discovered that January was processing used oil through the use of a centrifuge and a vibratory screen filter. As this was not authorized in the permit, January was required to submit an application for a major permit modification. Submittals were received on October 15, 2015, November 12, 2015 and November 17, 2015. The major permit modification was approved by the Department on February 11, 2016. The facility was required to submit an application for

Inspection Date: 05/23/2017

permit renewal by February 16, 2017; however, the application was not received until April 13, 2017. The Department issued a Request for Additional Information (RAI) on April 21, 2017; a response was due by May 22, 2017; however, an extension was granted until July 3, 2017.

The facility is no longer processing the used oil it receives from customers and has not been for the past several months. During this inspection, the centrifuge had been removed from the treatment system and per Mr. Torres, will be sent to January's Oklahoma facility.

At the time of this inspection, two of the company vehicle operating out of this location were present onsite. A Wastewater Truck was located next to the building. Used Oil Truck #15, which was empty at the time of the inspection, was located at the rail car loading rack. Per Mr. Torres, January uses TIF XL-1A meters to screen used oil for halogen content prior to accepting the used oil from their customers. At the time of the inspection, neither a TIF instrument nor a Dexsil Test Kit was present in Used Oil Truck #15.

In addition to Used Oil Truck #15, one rail car was located at the loading rack. A track pan is located under the rail car loading area. The facility is not currently receiving or shipping used oil via rail. The rail car contained used oil solids as the liquids from this vessel had been placed into Tanker Trailer T-43. January is in the process of getting the solids removed from this railcar. The railcar will be re-certified and will then be sent to January's facility in Oklahoma. A second railcar, which was empty, was sent to January's Oklahoma facility within the past few months.

The facility is currently using six white 24,000-gallon aboveground storage tanks (ASTs) to store used oil. These ASTs are registered with the Department's Storage Tank Program, facility ID # 53/ 9101026. According to the electronic gauge, tank 101 contained 7,741-gallons of liquid, tank 102 contained 22,898-gallons of liquid, tank 103 contained 10,480-gallons of liquid, tank 104 contained 2,566-gallons of liquid, tank 105 contained 1,700-gallons of liquid, and tank 106 contained 22,694-gallons of liquid at the time of the inspection. A green AST has been installed in a separate containment area attached to the existing containment; at the time of the inspection this tank was empty. A second empty green AST and another silver AST were observed laying on their sides in the yard, both are empty. Please note that if any of these ASTs is to be used to store regulated materials they must comply with all regulatory requirements. Regulated tanks are required to be registered 30 days prior to installation, or within 30 days of changing from a waste water or process tank to a regulated used oil storage tank. In addition, a permit modification may be needed if storage capacity is increased. At the time of the inspection the containment around the tank farm was in good repair, did not contain any free liquids, and appeared to be adequate to contain the volume of the tanks.

Three tanker trailers were present at the facility at the time of the inspection. Tankers T-45 and T-120 were both empty. Tanker T-43 contained approximately 5,000-gallons of poor quality oil (high in both sediment and water content) from the railcar. Secondary containment was not provided for Tanker T-43.

Six used oil bins, all empty, were stored in the yard between Tankers T-43 and T-45. Two roll-off containers were located in the yard. The roll-off immediately north of Tanker T-43 contained solids collected from the used oil operations. The last shipment of solids to the landfill in Okeechobee took place in August of 2015. The analytical analysis from the August 2015 shipment, which did not include TCLP for volatiles, documents that the material was not characteristically toxic for any RCRA metals. The second roll-off contained solid waste from the facility: buckets, soil and plant debris.

A number of containers of oily water, used oil and used oil filters were observed in the building. According to Ms. January, some of their clients collect these wastes in drums which are brought back to the facility. Used oil will be pumped out of the drums to the used oil tanks, PCW will be routed to Aqua Clean and used oil filter will be collected until there are enough for a shipment.

Paperwork review included looking at incoming and outgoing bills of lading for 2015 through 2017. All outgoing shipments of used oil are going to Aaron Oil, Saraland, Alabama (EPA ID #ALD983180233). EPA identification numbers of the oil provider or designated facility were typically included on the bill of lading. Used oil filters are being sent to US Foundry in Miami.

Four drivers have worked at this facility in 2015, 2016 and 2017: Leandro Torres, Cruz Torres, Socrates Torres and Lynn Harris. Training records have not been provided as requested during the records review. No verification of training was provided for 2016 or 2017. Daily inspections were present for days when the facility is open and monthly storage tank inspection records are maintained.

Inspection Date: 05/23/2017

New Potential Violations and Areas of Concern:**Violations**

Type: Violation
Rule: 62-710.800(4)
Explanation: The permit expired April 16, 2017, and January failed to timely file an application to renew the permit
Corrective Action: Ensure that all required submittals are made to properly renew the permit.

Type: Violation
Rule: 62-710.600(2)(c)
Explanation: No verification of employee training was provided for 2016 or 2017.
Corrective Action: Immediately provide documentation that the required training has occurred or immediately provide the required training if it has not occurred and provide the documentation to the Department.

Type: Violation
Rule: 279.54(c)
Explanation: Secondary containment was not provided for the trailer storing used oil.
Corrective Action: Immediately provide secondary containment for this trailer or remove the oil to a container which has secondary containment.

Photo Attachments:

Tanker T-45 and T-43 are stored in the paved part of the yard.



Stormwater drain next to Trailer T-43 which contains used oil.



Type: Violation
Rule: 403.161(1)(b)
Explanation: Neither a halogen monitoring device or test kit was present in the Used Oil Truck #15.
Corrective Action: Ensure that all used oil trucks are provided with a halogen monitoring device or test kit.

Inspection Date: 05/23/2017

Conclusion:

The facility is not in compliance with state and federal hazardous waste regulations at the time of the inspection.

Inspection Date: 05/23/2017

1.0 - Pre-Inspection Checklist**Requirements:**

The requirements listed in this section provide an opportunity for the Department's inspector to indicate the conditions found at the time of the inspection. A "Not Ok" response to a requirement indicates either a potential violation of the corresponding rule or an area of concern that requires more attention. Both potential violations and areas of concern are discussed further at the end of this inspection report.

Item No.	Pre-Inspection Review	Yes	No	N/A
1.1	Has the facility notified with correct status? 262.12	✓		
1.2	Has the facility notified of change of status? 62-730.150(2)(b)	✓		
1.3	Did the facility conduct a waste determination on all wastes generated? 262.11	✓		

Inspection Date: 05/23/2017

Signed:

A hazardous waste compliance inspection was conducted on this date, to determine your facility's compliance with applicable portions of Chapters 403 & 376, F.S., and Chapters 62-710, 62-730, 62-737, & 62 -740 Florida Administrative Code (F.A.C.). Portions of the United States Environmental Protection Agency's Title 40 Code of Federal Regulations (C.F.R.) 260 - 279 have been adopted by reference in the state rules under Chapters 62-730 and 62-710, F.A.C.

Leslie Pedigo

PRINCIPAL INSPECTOR NAME

Inspector

PRINCIPAL INSPECTOR TITLE**PRINCIPAL INSPECTOR SIGNATURE**

DEP

ORGANIZATION

07/18/2017

DATE

Elizabeth Knauss

Inspector NAME

Environmental Consultant

Inspector TITLE

FDEP/SWD

ORGANIZATION

Shannon Kennedy

Inspector NAME

Environmental Specialist II

Inspector TITLE

DEP/SWD

ORGANIZATION

Cruz Torres

Representative NAME

Driver

Representative TITLE

January Environmental Services, Inc.

ORGANIZATION

NOTE: By signing this document, the Site Representative only acknowledges receipt of this Inspection Report and is not admitting to the accuracy of any of the items identified by the Department as "Potential Violations" or areas of concern.

Loren January

Representative NAME

Secretary

Representative TITLE

January Environmental Services, Inc.

ORGANIZATION

NOTE: By signing this document, the Site Representative only acknowledges receipt of this Inspection Report and is not admitting to the accuracy of any of the items identified by the Department as "Potential Violations" or areas of concern.

Report Approvers:**Approver:**

Shannon Kennedy

Inspection Approval Date:

07/18/2017

PENALTY COMPUTATION WORKSHEET

Violator's Name: January Environmental Services, Inc.

Identify Violator's Facility: FLD982162943

Name of Department Staff Responsible for the Penalty Computations: Leslie Pedigo

Date: 6/27/2017

	Violation Type	Manual Guide	ELRA Schedule	ELRA Amount	Multi Day	Other Adjustment	Total
1.	62-710.800(4) FAC – failure to timely renew permit (Application and fee have been submitted)	UO 91	403.121(3)(e)	\$2,000.00			\$2,000.00
2.	62-710.600(2)(b) – training & training records not available	UO 62	403.121(4)(e)	\$1,000.00			\$1,000.00
3.	279.54(c) – Secondary containment not provided for oil trailer storing oil	UO 102	403.121(4)(b)	\$4,000.00			\$4,000.00
4.	403.121(5) FS- 403.121(4)(b) – Violation of specific condition 45 of the facility permit. No halogen monitoring device or test kit was in the pump truck. An unused device was in the laboratory	UO 125	403.121(4)(d)	\$2,000.00			\$2,000.00 500.00
SUB-TOTAL							\$9,000.00 6500.00
DEPARTMENT COSTS							250.00

Total Penalties Including Department Costs

\$9,250.00 6750
~~9000.00~~

Mary E. Yeargan, P.G.
Southwest District Director
Florida Department of Environmental Protection

Date _____

WORKSHEET
ELRA PENALTY DETERMINATION

FACILITY NAME: January Environmental Services, Inc. Date: July 6, 2017

EPA ID No.: FLD982162943 Case #: _____

403.121(3)(e) For solid waste violations, the department shall assess a penalty of \$2,000 for the unpermitted or unauthorized disposal or storage of solid waste; plus \$1,000 if the solid waste is Class I or Class III (excluding yard trash) or if the solid waste is construction and demolition debris in excess of 20 cubic yards, plus \$1,000 if the waste is disposed of or stored in any natural or artificial body of water or within 500 feet of a potable water well, plus \$1,000 if the waste contains PCB at a concentration of 50 parts per million or greater; untreated biomedical waste; friable asbestos greater than 1 cubic meter which is not wetted, bagged, and covered; used oil greater than 25 gallons; or 10 or more lead acid batteries.

The department shall assess a penalty of \$3,000 for ...; unauthorized burning; ...

The department shall assess a penalty of \$2,000 for failure to construct or maintain a required stormwater system.

403.121(4) In an administrative proceeding, in addition to the penalties that may be assessed under subsection (3), the department shall assess administrative penalties according to the following schedule:

- (a) For failure to satisfy financial responsibility requirements or for violation of s. 377.371(1), \$5,000.
- (b) For failure to install, maintain, or use a required pollution control system or device, \$4,000.
- (c) For failure to obtain a required permit before construction or modification, \$3,000.
- (d) For failure to conduct required monitoring or testing; failure to conduct required release detection; or failure to construct in compliance with a permit, \$2,000.
- (e) For failure to maintain required staff to respond to emergencies; failure to conduct required training; failure to prepare, maintain, or update required contingency plans; failure to adequately respond to emergencies to bring an emergency situation under control; or failure to submit required notification to the department, \$1,000.
- (f) ... for failure to prepare, submit, maintain, or use required reports or other required documentation, \$500.

403.121(5) ..\$500 for failure to comply with any other departmental regulatory statute or rule requirement not otherwise identified

403.121(6) For each additional day during which a violation occurs, the administrative penalties in subsection (3), subsection (4), and subsection (5) may be assessed per day per violation.

403.121(7) The history of noncompliance of the violator ... resulting in an executed consent order, final order or judgment, ... involving the imposition of \$2,000 or more in penalties shall be taken into consideration in the following manner:

- (a) + 25% -One previous such violation within 5 years prior to the filing of the notice of violation
- (b) +50% Two previous such violations within 5 years prior to the filing of the notice of violation.
- (c) +1--% Three or more previous such violations within 5 years prior to the filing of the notice of violation

403.121(8) The direct economic benefit gained by the violator from the violation..., shall be added to the scheduled administrative penalty. The total administrative penalty, ...(still) shall not exceed \$10,000.

403.121(9) The administrative penalties assessed for any particular violation shall not exceed \$5,000 against any one violator, unless the violator has a history of noncompliance, the economic benefit of the violation as described in subsection (8) exceeds \$5,000, or there are multiday violations. The total administrative penalties shall not exceed \$10,000 per assessment for all violations attributable to a specific person in the notice of violation.

ECONOMIC BENEFIT WORKSHEET

FACILITY NAME: January Environmental Services, Inc. Date: July 6, 2017

EPA ID No.: FLD982162943 Case #:

Violation: 279.54(c) – Secondary Containment not provided for a trailer holding used oil

The avoided costs for providing secondary containment are negligible as the facility's storage tanks had the available capacity to hold the used oil in the tank trailer. The facility could have moved the oil stored in one of their six tanks to another tank to hold the material separately. No extra tank capacity or secondary containment capacity was required for the facility to be operating in compliance, therefore the avoided or delayed costs are negligible, and consist of only staff time to switch pumps.

EB = Avoided Costs (1-C) + Delayed Costs (T)

C = Current Corporate Tax Rate = .34 (2017 values - Check items in RED for current rates)

T = IRS Interest Rate = 3% per year

Violation:

Avoided Costs = Estimated to be less than \$300

Delayed Costs = Estimated to be less than \$300

EB = assessment is not required per guidelines

https://fdcploc.dep.state.fl.us/appdata/rcra_epa/Guidance/Econ_Benefit_Calc_Guide.pdf



Employee Training Manual

Employee Leandro Torres

Training Manual has been given on the following:

- ☒ Used Oil Transporter Training Program
- ☒ Management Standards of Used Oil, Used Oil Filters, and Antifreeze

I certify that I have read and familiar with the material listed above.

Employee Signature: [Signature]

Printed Name: Leandro Torres

Received
04.08.16
[Signature]



Employee Training Manual

Employee J. Cruz Torres

Training Manual has been given on the following:

- ☒ Used Oil Transporter Training Program
- ☒ Management Standards of Used Oil, Used Oil Filters, and Antifreeze

I certify that I have read and familiar with the material listed above.

Employee Signature: [Signature]

Printed Name: J. Cruz Torres

Received
04.08.16
[Signature]



Employee Training Manual

Employee Leandro Torres

Training Manual has been given on the following:

- ☒ Used Oil Transporter Training Program
- ☒ Management Standards of Used Oil, Used Oil Filters, and Antifreeze

I certify that I have read and familiar with the material listed above.

Employee Signature: [Signature]

Printed Name: Leandro Torres

Received:
04.24.17

[Signature] Dowart



Employee Training Manual

Employee J. Cruz Torres

Training Manual has been given on the following:

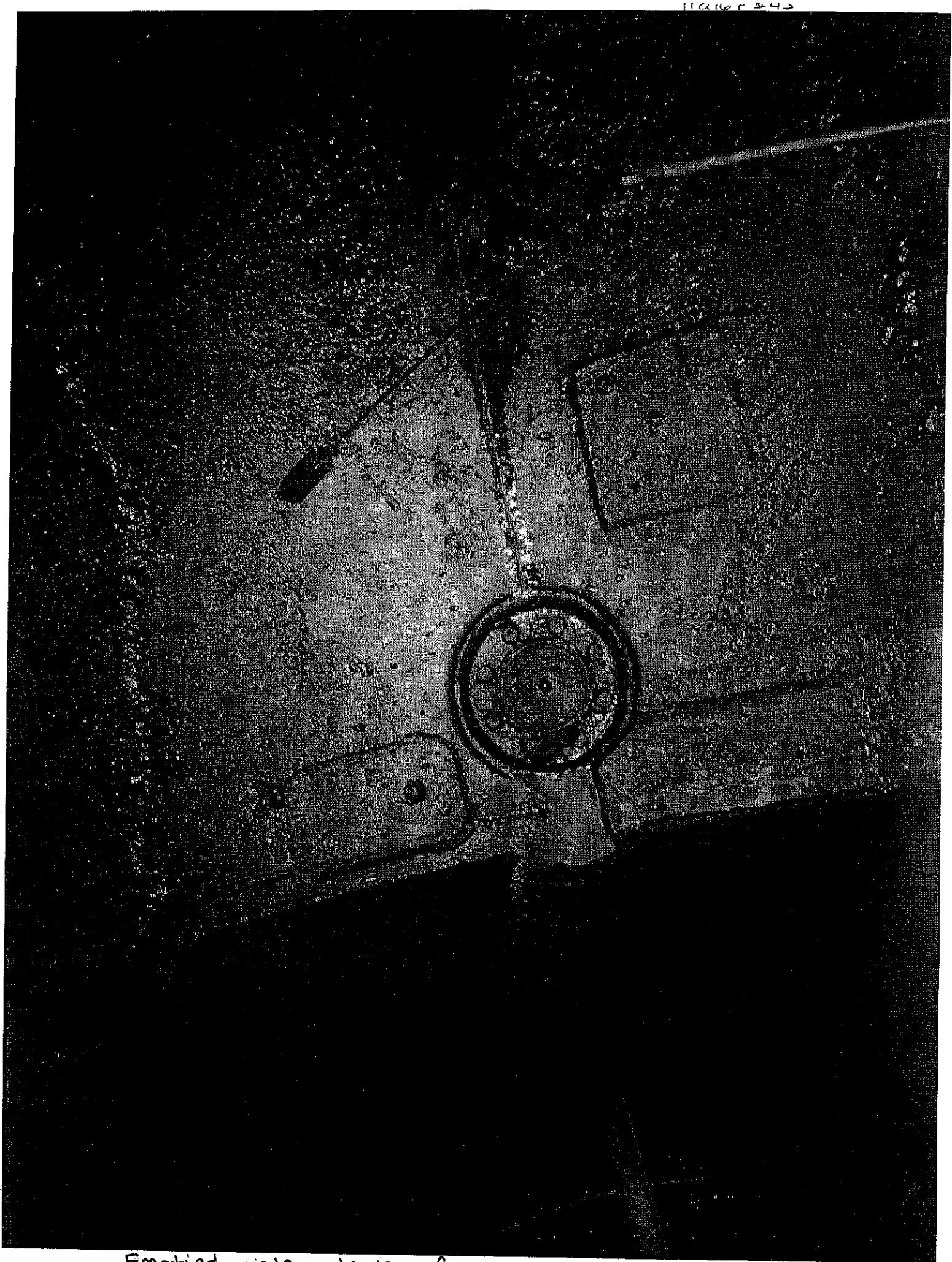
- ☒ Used Oil Transporter Training Program
- ☒ Management Standards of Used Oil, Used Oil Filters, and Antifreeze

I certify that I have read and familiar with the material listed above.

Employee Signature: J. Cruz

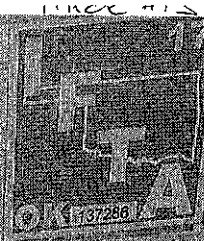
Printed Name: J Cruz Torres

Received
04.26.2017
L Dowant



Emotied into tank farm

KYU 149924



VIN.VD436843

