



MITTAUER
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December 4, 2017

Mr. Bryan Baker, P.G.
Environmental Administrator
Florida Department of Environmental Protection
2600 Blair Stone Road
Tallahassee, Florida 32399-2400

RE: **Response to First Request for Additional Information (RAI)**
Duval County – Hazardous Waste
Facility Name: Liquid Environmental Solutions of Florida, LLC
EPA I.D. No.: FLD 981 928 484
Current Permit Number: 72815-016-HO; 72815-017-SO
DEP Application No.: 72815-017-HO; 72815-018-SO
Duval County - Used Oil Processor
Liquid Environmental Solutions of Florida, LLC
Mittauer & Associates, Inc. Project No. 9122-42-1

Dear Mr. Baker:

In response to your Request for Additional Information letter dated October 6, 2017, on behalf of Liquid Environmental Solutions of Florida, LLC, Mittauer & Associates, Inc. provides the following responses to your comments:

1. Tab 1, DEP Form 62-710.901(6):

Comment No. 1a: Part I, Page 1 of 8, #12, Legal Structure: Please list the state of incorporation and resubmit this page electronically for our records.

Response No. 1a: Part I, Page 1 of 8, #12 is revised to include the state of incorporation. Revised page(s) are included on the enclosed DVD.

Comment No. 1b: Part I, Page 2 of 8, #12, Legal Structure: Please list the state where the name is registered, if operating under an assumed name and resubmit this page electronically for our records.

Response No. 1b: Part I, Page 2 of 8, #12, The applicant is not operating under an assumed name. Revised page(s) are included on the enclosed DVD.

Comment No. 1c: Part I, Page 3 of 8, C. Operating Information, 2: Please add the following EPA hazardous waste codes: F003, F005 and D002 and resubmit this page electronically for our records.

Response No. 1c: LES no longer generates the type of waste covered by codes F003, F005 or D002. Please reference the LES Annual Report 8700-12FL Florida Notification of Regulated Waste Activity.

Comment No. 1d: Part II, Certifications, page 5 of 8, Operator Certification: No date is included. Please submit a dated form.

Response No. 1d: Part II, Certifications, page 5 of 8 is revised to include signature date. Revised page(s) are included on the enclosed DVD.

2. Tab 2, Attachment B.3:

Comment No. 2a: Design Sheet B-3c: Please explain why tank #30 is depicted using a different symbol than other tanks. Resubmittal of the design sheet is not necessary.

Response No. 2a: The symbol depicting Tank #30 is different for no known reason. The symbol has been changed to represent an existing tank, consistent with the drawing legend.

Comment No. 2b: Design Sheet B-3d: Design Sheet B-3c states that Tanks 3A, 3B, 4A, and 4B will be removed in 2017; whereas, this sheet does not say when. In light of the fact that we are in the 10th month of 2017, when are these tanks scheduled to be removed? Resubmittal of the design sheet is not necessary.

Response No. 2b: Tanks 3A, 3B, 4A, and 4B are still scheduled for removal this calendar year, and this goal is expected to be met before the year's end.

3. Tab 4, Attachment C.4:

Comment No. 3ai: Page 1, Operating Information:
Oily Wastewater: In the section on processing under Oily Wastewater, free oil will be removed and transferred to tanks 4A, 4B, or the oil processing tanks. Tanks 4A and 4B are scheduled to be removed. How will this process change when the tanks are removed?

Response No. 3ai: Tank 101 will be used to replace tanks 4A and 4B.

Comment No 3aii: **Used Oil (last paragraph):** Tank 21 is listed as Virgin Fuel and not Used Oil, and Used Oil tank 101 is not listed. Please review and revise this section accordingly. Please submit any revised pages electronically for our records.

Response No. 3aii: Tank No. 21 has been removed from section C.5 as a used oil container, and Tank No. 101 has been included as a used oil container. Revised page(s) are included on the enclosed DVD.

4. Tab 5, Attachment C.5:

Comment No. 4a: **Page 4, 2.1 Used Oil Acceptance Protocol:** For future permit application renewals, please note that the spelling of (Dexsil Chlor-D-Tect) should read (Dexsil Clor-D-Tect).

Response No. 4a: Nomenclature has been revised to correct typo. Revised page(s) are included on the enclosed DVD.

Comment No. 4b: **Page 5, 1st paragraph:** Please note that the word "coliwasa" is an abbreviation for "Composite Liquid Waste Sampler." For future note, abbreviations should be spelled out the first time the abbreviation is used in a document.

Response No. 4b: The full terminology has been incorporated with the abbreviation following in parentheses. Revised page(s) are included on the enclosed DVD.

Comment No 4bi: **Page 7, 2.3 Acceptance Records:** Per Rule 62-710.510(1), F.A.C., the information recorded for each accepted used oil load should include the following in addition to what is listed on this page of Attachment C.5. The telephone number of the transporter,

Response No. 4bi: Attachment C.5 ACCEPTANCE RECORDS criteria are revised to include the telephone number of the transporter. Revised page(s) are included on the enclosed DVD.

Comment No. 4bii: The destination or end use of used oil and oily wastes, including the name and street address of each destination or end user, the EPA identification number if applicable, and the end use code designation found in the form instructions; and

Response No. 4bii: Attachment C.5 ACCEPTANCE RECORDS criteria are revised to include the destination or end use of used oil and the end use code. Revised page(s) are included on the enclosed DVD.

Comment No. 4biii: Documentation of halogen screening in accordance with the requirements of 40 CFR Part 279 [as adopted in subsection 62-710.210(2), F.A.C.].

Please review and revise this section accordingly. Please submit any revised pages electronically for our records.

Response No. 4biii: Attachment C.5 ACCEPTANCE RECORDS criteria are revised to include documentation of halogen screening. Revised page(s) are included on the enclosed DVD.

5. Tab 6, Attachment C.6 & 7:

Comment No. 5a: Page 1, Spill Prevention, Control and Countermeasure Plan: Please add Emergency Coordinator and name.

Response No. 5a: PRIMARY EMERGENCY RESPONSE COORDINATOR added to Page No. 1 of section, with coordinator's name & title. Revised page(s) are included on the enclosed DVD.

Comment No. 5b: Page 4: The Certification page for the SPCC Plan is dated June 1, 2014 but is not signed. Please sign, update the date, and resubmit electronically for our records.

Response No. 5b: Certification page for the SPCC Plan with required signatures & dates completed. Revised page(s) are included on the enclosed DVD.

Comment No. 5c: Page 8 & 9, 6.0 Facility Description: In the second paragraph, please review the storage capacities listed for oil and wastewaters tanks and revise, if needed. Why does the table on page 9 exclude Tank #101? Please submit any revised pages electronically for our records.

Response No. 5c: Storage capacities are reviewed. Tank No. 101 included, and capacities revised. Additionally, Tank Nos. 17 & 21 revised from "Virgin Fuels" to "Fuel Products" on all materials. Revised page(s) are included on the enclosed DVD.

Comment No. 5d: Page 10, Containment and Diversionary Structures: Please provide the secondary containment calculations for the facility and reference them in this section.

Response No. 5d: Secondary containment calculations were performed in January 2017. The secondary containment capacity is specified on Page No. 10 of this section, and are incorporated into the SPCC as Appendix C. Revised page(s) are included on the enclosed DVD.

Comment No. 5e: Page 16, 8.0 Notification and Response Procedures, Major Spill Events: Addresses for the emergency coordinators must also be provided in the Contingency Plan for the facility per 40 CFR 279.52(b)(2)(iv). Please either provide that information here or refer to the information in Appendix A.

Response No. 5e: Addresses for primary and alternate Emergency Response Coordinators added. Revised page(s) are included on the enclosed DVD.

Comment No. 5f: Page 25, 11.0 Facility Inspection and Records: Add the following tank inspection requirements; Document weekly PCW container and/or tank inspections per Rule 62-740.100(2)(e), F.A.C.

Response No. 5f: PCW Tank/Container added to Weekly Inspection requirements on Page No. 25. Revised page(s) are included on the enclosed DVD.

Comment No. 5g: Page 31, 14.0 Inspection and Reporting Forms: Add a separate section for PCW Tanks per Rule 62-740.100(2)(e), F.A.C.

Response No. 5g: Section for weekly PCW inspections added to the reporting form. Revised page(s) are included on the enclosed DVD.

Comment No. 5h: Page 44, Chemical Spills: The command post area, the LES Operations Office, is identified as the area to convene for assessing any emergency response actions. Please identify this location on the Evacuation Map, Design Sheet C-7e.2. Note that the word "evacuation" is misspelled in the legend.

Response No. 5h: Revised Attachment C.6 & 7 Page No. 44 command post area from "OPERATIONS OFFICE" to "ADMINISTRATIVE OFFICE" to be consistent with plan exhibits.
Revised the SPCC Plan- Existing Site Plan (Evacuation Map, Design Sheet C-7e.2) to include the identification of the COMMAND POST AREA.
Revised the SPCC Plan- Existing Site Plan (Evacuation Map, Design Sheet C-7e.2) to corrected misspelling of the word "evacuation" in the legend.
Revised page(s) are included on the enclosed DVD.

Comment No. 5i: Appendix A: Roster of Personnel: This roster is dated January 10, 2008. Please update the date on the roster and verify that the information provided is still accurate as that was nearly 10 years ago.

Response No. 5i: Reviewed Roster of Personnel to verify current information, and update the Roster review date. Revised page(s) are included on the enclosed DVD.

Comment No. 5ii: List the names, addresses, and phone numbers (office and home) of all persons qualified to act as an emergency coordinator (EC) per 40 CFR 265.55 for EC requirements. Where more than one person is listed, the facility must name a primary EC and others must be listed in the order in which they will assume responsibility as alternates.

Response No. 5ii: Roster of Personnel names, addresses and phone number are verified to be current. Phone numbers shown are used as 24/7 contact for home, office & mobile for these personnel.
Revised ROSTER OF PERSONNEL to identify the Primary & Alternate Emergency Response Coordinators.
Revised page(s) are included on the enclosed DVD.

Comment No. 5j: In light of recent Hurricane Irma, please add a section in your SPCC Plan addressing hurricane preparation/response.

Response No. 5j: LES has prepared HURRICANE PROCEDURES and have incorporated this as a section in the STANDARD OPERATING PROCEDURES.
Revised page(s) are included on the enclosed DVD.

6. Tab 7, Attachment C.8:

Comment No. 6a: Page 1, Tanks and Related Equipment: Please provide the secondary containment calculations for the facility and reference them in this section.

Response No. 6a: Secondary containment calculations are added to Attachment. Revised page(s) are included on the enclosed DVD.

7. Tab 8, Attachment C.9:

Comment No. 7a: Page I, Closure Plan, Introduction: Written notification to the Department should be made within 60 days, not 30 days, prior to the scheduled date of closing, per Rule 62-710.800(5)(d), F.A.C. Please revise and resubmit this page electronically for our records.

Response No. 7a: Closure Plan, Introduction revised to indicate that written notification to the Department should be made within 60 days prior to the scheduled date of closing. Revised page(s) are included on the enclosed DVD.

Comment No. 7b: Page 4, Schedule of Analytical Methods: The footnote cites to EPA Method 8023. Did you mean EPA Method 9023? Please revise if needed and resubmit this page electronically for our records.

Response No. 7b: Schedule of Analytical Methods footnote revised to indicate EPA Method 9023. Revised page(s) are included on the enclosed DVD.

Comment No. 7c: **Page 5, Soil and Groundwater Sampling Protocols:** Upon closure, soil and groundwater sampling should be conducted per Rule 62-780, F.A.C. Per this rule, samples should be collected from land surface to 6", 6" to 2', and so on until the water table is reached. Are each of the proposed locations covered by concrete, asphalt or bare soil? Please review this section, revise and provide more detail. Please submit this page electronically for our records. Note that the Department inspector may request different and/or additional soil sampling locations at closure depending on the site conditions existing at that time.

Response No. 7c: A search of the Rule 62-780, F.A.C. for keywords associated with the statement above was conducted, and regulation on the information above could not be identified. We request your assistance with more specific Rule information such as section & paragraph. At this time no revision has been made to the submitted Attachment C.9 on this subject.

Comment No. 7d: **Design Sheet C-9b:** Please explain why Tank #47 is partially dashed on this design sheet. According to the legend, dashed tanks have not been constructed. Please verify that Tank #47 is existing. Resubmittal of the design sheet is not necessary.

Response No. 7d: In drafting standards, a dashed line is used for items that are hidden from view from the point of view of the drawing (overhead in this case). For the purposes of this plan this standard should not have been used. The tank is revised to represent an existing tank, consistent with the legend. Revised page(s) are included on the enclosed DVD.

Comment No. 7e: **Appendix C: Tank Inspection & Integrity Test Plan:** Add the following tank inspection requirements; Document weekly PCW container or tank inspections per Rule 62-740.100(2)(e), F.A.C.

Response No. 7e: The following paragraph is added to Page No. 47 of Appendix C: Tanks containing Petroleum Contact Water (PCW) require weekly inspection. Weekly inspections shall be documented using the STI SP001 Monthly Inspection Checklist, which is attached at the end of this Appendix. The record of inspection shall be retained for 3 years per 62-740.100(2)(e) and 62-740.100(6)(f). Revised page(s) are included on the enclosed DVD.

8. Attachment C.10, Page 5:

Comment No. 8a,b: a. **2.2 Florida Used Oil Rule:** Change to read: 2.2 Florida Used Oil Rule- 62-710, F.A.C.

b. 2.3 Florida PCW Rule: Change to read: 2.3 Florida PCW Rule-62-740, F.A.C.

Response No. 8a,b: Revised F.A.C. rules referenced in paragraphs 2.2 & 2.3 as requested. Revised page(s) are included on the enclosed DVD.

9. Attachment C.10, C. Department Rules (Florida Administrative Code F.A.C.), found in: Add the following PCW 62-740, F.A.C Rules:

- Comment No. 9a-g:**
- a. 62-740.010 Declaration of Intent.**
 - b. 62-740.020 Applicability.**
 - c. 62-740.030 Definitions.**
 - d. 62-740.040 General.**
 - e. 62-740.100 Management Practices for Producers of PCW for Product Recovery.**
 - f. 62-740.200 Management Practices for Transporters Shipping PCW for Product Recovery.**
 - g. 62-740.300 Management Practices for Recovery Facilities.**

Response No. 9a-g: Revised Attachment C.10 to include additional F.A.C. rules as requested. Revised page(s) are included on the enclosed DVD.

10. Tab 10, DEP Form 62-701.900(4):

Comment No. 10a: Page 4 of 4, C – Certification by Applicant and Engineer or Public Officer: Signature of the Applicant/Plant Manager is not dated. Please submit a dated signed page for our records.

Response No. 10a: Added date of signature to certification. Revised page(s) are included on the enclosed DVD, and an original is included in the package.

Review Comments for Application for Renewal Material Processing Facility Permit:

The renewal application for a material processing facility has been reviewed with respect to the applicable requirements in 62-701.710, F.A.C. The following items are provided:

Comment No. 1: Section B of DEP Form # 62-701.900(4), electronic document page 113 contains a list of reports and documentation required. The application indicated “See Attachment A”, which was submitted as part of the previous application on March 18, 2013. It is recommended the applicant revise Section B to reflect that Attachment A was previously submitted on March 13, 2013, and is still applicable. Rule reference: 62-701.710(2)(a).

Response No. 1: Attachment A was inadvertently omitted from the permit renewal package. Please find Attachment A included on the enclosed DVD.

Comment No. 2: **The application did not include a site plan that shows the facility location, total acreage of the site, and other relevant features such as water bodies, or wetlands within 200 feet of the site, and potable wells within 500 feet of the site. The site plan should have a scale not greater than 200 feet to one inch, and be signed and sealed by a professional engineer pursuant to Chapter 471, Florida Statutes. A site plan that meets these requirements should be submitted. Rule reference: 62-701.710(2)(b).**

Response No. 2: A new Exhibit (2)(b) is prepared for the purpose of the referenced F.A.C requirements. A copy of the Exhibit is included on the enclosed DVD.

Comment No. 3: **The application did not include information regarding record keeping of the materials associated with the materials processing portion of the permit. Operational records are required to be maintained to include a daily log of the quantity of solid waste received, processed, stored, and removed from the site for recycling or disposal, and the county of origin of the waste, if known. These records shall include each type of solid waste, recovered materials, residuals, and unacceptable waste which is processed, recycled, and disposed. Such records shall be compiled on a monthly basis and shall be available for inspection by the Department. Records shall be retained at the facility for three years. Additional information regarding how the record keeping requirements will be met should be submitted. Rule reference: 62-701.710(2)(e) and 62-701.710(8)(a).**

Response No. 3: Attachment A is revised to include a discussion of record keeping policies and practices. Please find Attachment A included on the enclosed DVD for Review Comments Item No. 1 above.

Comment No. 4: **It is recommended that the first sentence of the Closure Plan in Attachment C.9 (electronic document page 88) be revised to reflect that the closure plan is also intended to fulfill the requirements in Chapter 62-701.710(6). Rule reference: 62-701.710(2)(f) and 62-701.710(6).**

Response No. 4: Attachment C.9 is revised to include all of the Rules referenced in comment. Revised page(s) are included on the enclosed DVD. Please note that 62-701.710(6) is cited twice in the above comment. Please let us know if there was another rule that was supposed to be referenced.

Comment No. 5: **No specific information was provided by the applicant regarding the financial assurance requirements specified in 62-701.710(7), F.A.C. Additional information regarding how the financial assurance**

requirements will be met should be submitted. Rule reference: (62-701.710(2)(h), F.A.C.).

Response No. 5: The Financial Assurance letter was included with the 62-710.901(7) Used Oil Processing Facility Closing Cost Estimate form. A copy is now included with the 62-701.900(4) form. Revised page(s) are included on the enclosed DVD.

Citation Errors: Please note that the following citation errors were observed in the permit application. Please review, revise and resubmit the appropriate pages electronically for our records:

1. Tab 5, Attachment C.5:

Comment No. 1a: Page 6, 2.2.1 Process Knowledge: Incorrect Reference. Reference 40 CFR 261.5(j) is listed as reserved. Did you mean 40 CFR 261.3(v)?

Response No. 1a: 40 CFR 261.5(j) is the correct reference reading:
(j) If a conditionally exempt small quantity generator's wastes are mixed with used oil, the mixture is subject to part 279 of this chapter. Any material produced from such a mixture by processing, blending, or other treatment is also so regulated.

Comment No. 1b: Page 7, 2.3 Acceptance Records: Incorrect Reference. Rule 62-710.510(1)(c), F.A.C. should read Rule 62-710.510(1)(d), F.A.C.

Response No. 1b: Revised reference. Revised page(s) are included on the enclosed DVD.

Comment No. 1c: Page 8, 3.1 Off-specification Used Oil: Incorrect Reference in (6), end use of the oil. The reference (Rule 62-710.510(1)(e), F.A.C.) should read Rule 62-710.510(1)(f), F.A.C.

Response No. 1c: Revised reference. Revised page(s) are included on the enclosed DVD.

2. Tab 8, Attachment C.9:

Comment No. 2a: Page 1, Closure Plan, Introduction: Incorrect citation. Chapter 62-710.800(9), F.A.C. should read Chapter 62-710.800(5), F.A.C.

Response No. 2a: Revised reference. Revised page(s) are included on the enclosed DVD.

Mr. Bryan Baker
December 4, 2017
Page 11

Comment No. 2b: Page 2, Closure Procedures: Incorrect citation. 40 CFR 179.54(h)(ii) should read 40 CFR 279.54(h)(ii).

Response No. 2b: Revised reference. Revised page(s) are included on the enclosed DVD.

3. Tab 9, Attachment C.10: There are a few citation errors within your document titled, "A Brief Summary of the Rules and Regulations Applicable to a Used Oil Transporter Training Program."

Comment No. 3a: Under B, Florida Law, #4: §403.708(14) should read §403.708(12)(b).

Response No. 3a: Revised reference. Revised page(s) are included on the enclosed DVD.

Comment No. 3bi: Under C, Department Rules:
#1: "(85) oily wastes and (129) used oil" should read "(78) oily wastes and (122) used oil."

Response No. 3bi: Revised reference. Revised page(s) are included on the enclosed DVD.


Comment No. 3bii: #2: Rule 62-701.300(8b) should read Rule 62-701.300(8)(a).

Response No. 3bii: Revised reference. Revised page(s) are included on the enclosed DVD.

Document requiring original signatures will be transmitted via USPS. These Include response item nos. 2 & 7

Please contact me via telephone at (904) 278-0030 or email at dhodges@mittauer.com if you need additional information. Thanks again for your assistance in expediting the permitting process.

Sincerely yours,
Mittauer & Associates, Inc.



David S. Hodges
Project Engineer

DSH/lw

cc: Yuri Turovsky (Liquid Environmental Solutions of Florida, LLC)

RAI RESPONSE INDEX

FDEP REQUEST FOR ADDITIONAL INFORMATION LETTER

Florida Department of Environmental Protection Letter of October 6, 2017 – Request for Additional Information for the Permit Renewal of Liquid Environmental Solutions

RESPONSES

<u>ITEM #</u>	<u>RAI ITEM</u>	<u>REFERENCE</u>
1	RAI 1,a,b,&c	62-710.901(6)
2	RAI 1,d	62-710.901(6)
3	RAI 3,a,ii	C4
4	RAI 4 (all)	C5
5	RAI 5,a	C6&7, pg 1
6	RAI 5,b	C6&7, pg 4
7	RAI 5,c	C6&7, pgs 8&9
8	RAI 5,d	C6&7, pg 10
9	RAI 5,d	C6&7, SPCC Appendix C, Secondary Containment Calcs
10	RAI 5,e	C6&7, pg 16
11	RAI 5,f	C6&7, pgs 25-26
12	RAI 5,g	C6&7, pg 31
13	RAI 5,h	C6&7, pg 44 & SPCC Exhibit
14	RAI 5,h,i & ii	C6&7, Roster
15	RAI 5,j	C6&7, Hurricane Preparedness SOP
16	RAI 6,a	C8, Containment Calcs
17	RAI 7,a	C9, pg 1
18	RAI 7,b	C9, pg 4
19	RAI 7,e	C6&7, Appendix C
20	RAI 8,a&b	C10, pg 5
21	RAI 9 a-g	C10, Chapter 2 - Summary of Regulations
22	RAI Review Comments 1	Attachment A
23	RAI Review Comments 2	Exhibit (2)(b)
24	RAI Review Comments 3	Attachment A
25	RAI Review Comments 4	C9, pg 1
26	RAI Review Comments 5	Financial Assurance Letter
27	RAI Citation Errors 1,b	C5 Para. 2.3
28	RAI Citation Errors 1,c	C5 Para. 3.1
29	RAI Citation Errors 2,a	Introduction
30	RAI Citation Errors 2,b	Closure Procedures
31	RAI Citation Errors a,bi,bii	Summary



Florida Department of Environmental Protection

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

Rick Scott
Governor

Carlos Lopez-Cantera
Lt. Governor

Noah Valenstein
Secretary

REQUEST FOR ADDITIONAL INFORMATION

October 6, 2017

Mr. Yuri Turovsky, Plant Manager
Liquid Environmental Solutions of Florida, LLC
1640 Talleyrand Avenue
Jacksonville, Florida 33314
Yuri.turovsky@liquidenviro.com

RE: **First Request for Additional Information (RAI)**
Duval County – Hazardous Waste
Facility Name: Liquid Environmental Solutions of Florida, LLC
EPA I.D. No.: FLD 981 928 484
Current Permit Number: 72815-016-HO; 72815-017-SO
DEP Application No.: 72815-017-HO; 72815-018-SO

Dear Mr. Turovsky:

Thank you for your application for renewal of the Used Oil and Solid Waste Operating Permit for the above referenced Facility. The Department has assigned DEP Application No. 72815-017-HO; 72815-018-SO to the application. A Department staff review of the application and supporting documentation submitted on August 21, 2017 and September 25, 2017 indicates the application is incomplete. Pursuant to the provisions of Rule 62-730.220 F.A.C. and Rule 62-730.220(6), F.A.C., please provide the information in the attached document and refer to this correspondence in your response. The response to this correspondence must be signed, sealed, and dated by a registered Florida Professional Engineer.

In order for the Department to continue processing your application, please submit the requested information as soon as possible. The Department must receive a response within 30 days of the date of this letter, November 6, 2017, unless a written request for additional time to provide the requested information is submitted and approved. Pursuant to Rule 62-730.220(6), F.A.C. and Section 120.60, F.S., failure of an applicant to provide the timely requested information by the applicable deadline may result in denial of the application. You are encouraged to contact this office to discuss the items requested to assist you in developing a complete and adequate response.

Mr. Yuri Turovsky

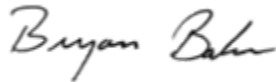
Page 2 of 7

October 6, 2017

Please submit the response in electronic format to HWPP@dep.state.fl.us, with a copy to Dawn.Cinquino@dep.state.fl.us. If the file is very large, you may post it to a folder on this office's ftp site at: [ftp://ftp.dep.state.fl.us/pub/incoming/DWM/\[name of folder\]](ftp://ftp.dep.state.fl.us/pub/incoming/DWM/[name of folder]). After posting the document, send an e-mail to HWPP@dep.state.fl.us, with a copy to Dawn.Cinquino@dep.state.fl.us, alerting us that it has been posted.

If you have any questions, please contact Dawn Cinquino by telephone at 850-245-8766 or by e-mail at Dawn.Cinquino@dep.state.fl.us.

Sincerely,



Bryan Baker, P.G.
Environmental Administrator
Florida Department of Environmental Protection

Attached: List of Requested Information

cc:

Pam Fellabaum, DEP Northeast, pam.fellabaum@dep.state.fl.us

Homer Butler, DEP Northeast, homer.butler@dep.state.fl.us

Ashanti McBride, DEP OGC, ashanti.mcbride@dep.state.fl.us

Bheem Kothur, DEP Headquarters, bheem.kothur@dep.state.fl.us

Bradley Buselli, DEP Headquarters, bradley.buselli@dep.state.fl.us

James Jarmolowski, DEP Headquarters, james.jarmolowski@dep.state.fl.us

Susan Eldredge, DEP Headquarters, susan.f.eldredge@dep.state.fl.us

Joseph Mittauer, Mittauer & Associates, admin@mittauer.com

Attachment: List of Requested Information

Facility Name: Liquid Environmental Solutions of Florida, LLC
EPA I.D. No.: FLD 981 928 484
Current Permit Number: 72815-016-HO; 72815-017-SO
DEP Application No.: 72815-017-HO; 72815-018-SO

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- b. Part I, Page 2 of 8, #12, Legal Structure: Please list the state where the name is registered, if operating under an assumed name and resubmit this page electronically for our records.
- c. Part I, Page 3 of 8, C. Operating Information, 2: Please add the following EPA hazardous waste codes: F003, F005 and D002 and resubmit this page electronically for our records.
- d. Part II, Certifications, page 5 of 8, Operator Certification: No date is included. Please submit a dated form.

2. Tab 2, Attachment B.3:

- a. Design Sheet B-3c: Please explain why tank #30 is depicted using a different symbol than other tanks. Resubmittal of the design sheet is not necessary.
- b. Design Sheet B-3d: Design Sheet B-3c states that Tanks 3A, 3B, 4A, and 4B will be removed in 2017; whereas, this sheet does not say when?. In light of the fact that we are in the 10th month of 2017, when are these tanks scheduled to be removed? Resubmittal of the design sheet is not necessary.

3. Tab 4, Attachment C.4:

- a. Page 1, Operating Information:
 - i. Oily Wastewater: In the section on processing under Oily Wastewater, free oil will be removed and transferred to tanks 4A, 4B, or the oil processing tanks. Tanks 4A and 4B are scheduled to be removed. How will this process change when the tanks are removed?
 - ii. Used Oil (last paragraph): Tank 21 is listed as Virgin Fuel and not Used Oil, and Used Oil tank 101 is not listed. Please review and revise this section accordingly. Please submit any revised pages electronically for our records.

4. Tab 5, Attachment C.5:

- a. Page 4, 2.1 Used Oil Acceptance Protocol: For future permit application renewals, please note that the spelling of (Dexsil **Chlor**-D-Tect) should read (Dexsil **Clor**-D-Tect).
- b. Page 5, 1st paragraph: Please note that the word “coliwasa” is an abbreviation for “Composite Liquid Waste Sampler.” For future note, abbreviations should be spelled out the first time the abbreviation is used in a document.
 - i. Page 7, 2.3 Acceptance Records: Per Rule 62-710.510(1), F.A.C., the information recorded for each accepted used oil load should include the following in addition to what is listed on this page of Attachment C.5. The telephone number of the transporter,

- ii. The destination or end use of used oil and oily wastes, including the name and street address of each destination or end user, the EPA identification number if applicable, and the end use code designation found in the form instructions; and
- iii. Documentation of halogen screening in accordance with the requirements of 40 CFR Part 279 [as adopted in subsection 62-710.210(2), F.A.C.].

Please review and revise this section accordingly. Please submit any revised pages electronically for our records.

5. Tab 6, Attachment C.6 & 7:

- a. Page 1, Spill Prevention, Control and Countermeasure Plan: Please add Emergency Coordinator and name.
- b. Page 4: The Certification page for the SPCC Plan is dated June 1, 2014 but is not signed. Please sign, update the date, and resubmit electronically for our records.
- c. Page 8 & 9, 6.0 Facility Description: In the second paragraph, please review the storage capacities listed for oil and wastewaters tanks and revise, if needed. Why does the table on page 9 exclude Tank #101? Please submit any revised pages electronically for our records.
- d. Page 10, Containment and Diversionary Structures: Please provide the secondary containment calculations for the facility and reference them in this section.
- e. Page 16, 8.0 Notification and Response Procedures, Major Spill Events: Addresses for the emergency coordinators must also be provided in the Contingency Plan for the facility per 40 CFR 279.52(b)(2)(iv). Please either provide that information here or refer to the information in Appendix A.
- f. Page 25, 11.0 Facility Inspection and Records: Add the following tank inspection requirements; Document weekly PCW container and/or tank inspections per Rule 62-740.100(2)(e), F.A.C.
- g. Page 31, 14.0 Inspection and Reporting Forms: Add a separate section for PCW Tanks per Rule 62-740.100(2)(e), F.A.C.
- h. Page 44, Chemical Spills: The command post area, the LES Operations Office, is identified as the area to convene for assessing any emergency response actions. Please identify this location on the Evacuation Map, Design Sheet C-7e.2. Note that the word “evacuation” is misspelled in the legend.
- i. Appendix A: Roster of Personnel:
 - i. This roster is dated January 10, 2008. Please update the date on the roster and verify that the information provided is still accurate as that was nearly 10 years ago.
 - ii. List the names, addresses, and phone numbers (**office and home**) of all persons qualified to act as an emergency coordinator (EC) per 40 CFR 265.55 for EC requirements. Where more than one person is listed, the facility must name a **primary** EC and others must be listed in the order in which they will assume responsibility as **alternates**.

- j. In light of recent Hurricane Irma, please add a section in your SPCC Plan addressing hurricane preparation/response.
- 6. **Tab 7, Attachment C.8:**
 - a. Page 1, Tanks and Related Equipment: Please provide the secondary containment calculations for the facility and reference them in this section.
- 7. **Tab 8, Attachment C.9:**
 - a. Page 1, Closure Plan, Introduction: Written notification to the Department should be made within 60 days, not 30 days, prior to the scheduled date of closing, per Rule 62-710.800(5)(d), F.A.C. Please revise and resubmit this page electronically for our records.
 - b. Page 4, Schedule of Analytical Methods: The footnote cites to EPA Method 8023. Did you mean EPA Method 9023? Please revise if needed and resubmit this page electronically for our records.
 - c. Page 5, Soil and Groundwater Sampling Protocols: Upon closure, soil and groundwater sampling should be conducted per Rule 62-780, F.A.C. Per this rule, samples should be collected from land surface to 6", 6" to 2', and so on until the water table is reached. Are each of the proposed locations covered by concrete, asphalt or bare soil? Please review this section, revise and provide more detail. Please submit this page electronically for our records. Note that the Department inspector may request different and/or additional soil sampling locations at closure depending on the site conditions existing at that time.
 - d. Design Sheet C-9b: Please explain why Tank #47 is partially dashed on this design sheet. According to the legend, dashed tanks have not been constructed. Please verify that Tank #47 is existing. Resubmittal of the design sheet is not necessary.
 - e. Appendix C: Tank Inspection & Integrity Test Plan: Add the following tank inspection requirements; Document weekly PCW container or tank inspections per Rule 62-740.100(2)(e), F.A.C.
- 8. **Attachment C.10, Page 5:**
 - a. 2.2 Florida Used Oil Rule: Change to read: **2.2 Florida Used Oil Rule-62-710, F.A.C.**
 - b. 2.3 Florida PCW Rule: Change to read: **2.3 Florida PCW Rule-62-740, F.A.C.**
- 9. **Attachment C.10, C. Department Rules (Florida Administrative Code F.A.C.), found in:** Add the following PCW 62-740, F.A.C Rules:
 - a. 62-740.010 Declaration of Intent.
 - b. 62-740.020 Applicability.
 - c. 62-740.030 Definitions.
 - d. 62-740.040 General.
 - e. 62-740.100 Management Practices for Producers of PCW for Product Recovery.
 - f. 62-740.200 Management Practices for Transporters Shipping PCW for Product Recovery.
 - g. 62-740.300 Management Practices for Recovery Facilities.
- 10. **Tab 10, DEP Form 62-701.900(4):**
 - a. Page 4 of 4, C – Certification by Applicant and Engineer or Public Officer: Signature of the Applicant/Plant Manager is not dated. Please submit a dated

signed page for our records.

Review Comments for Application for Renewal Material Processing Facility Permit:

The renewal application for a material processing facility has been reviewed with respect to the applicable requirements in 62-701.710, F.A.C. The following items are provided:

1. Section B of DEP Form # 62-701.900(4), electronic document page 113 contains a list of reports and documentation required. The application indicated "See Attachment A", which was submitted as part of the previous application on March 18, 2013. It is recommended the applicant revise Section B to reflect that Attachment A was previously submitted on March 13, 2013, and is still applicable. Rule reference: 62-701.710(2)(a).
2. The application did not include a site plan that shows the facility location, total acreage of the site, and other relevant features such as water bodies, or wetlands within 200 feet of the site, and potable wells within 500 feet of the site. The site plan should have a scale not greater than 200 feet to one inch, and be signed and sealed by a professional engineer pursuant to Chapter 471, Florida Statutes. A site plan that meets these requirements should be submitted. Rule reference: 62-701.710(2)(b).
3. The application did not include information regarding record keeping of the materials associated with the materials processing portion of the permit. Operational records are required to be maintained to include a daily log of the quantity of solid waste received, processed, stored, and removed from the site for recycling or disposal, and the county of origin of the waste, if known. These records shall include each type of solid waste, recovered materials, residuals, and unacceptable waste which is processed, recycled, and disposed. Such records shall be compiled on a monthly basis and shall be available for inspection by the Department. Records shall be retained at the facility for three years. Additional information regarding how the record keeping requirements will be met should be submitted. Rule reference: 62-701.710(2)(e) and 62-701.710(8)(a).
4. It is recommended that the first sentence of the Closure Plan in Attachment C.9 (electronic document page 88) be revised to reflect that the closure plan is also intended to fulfill the requirements in Chapter 62-62-701.710(6). Rule reference: 62-701.710(2)(f) and 62-701.710(6).
5. No specific information was provided by the applicant regarding the financial assurance requirements specified in 62-701.710(7), F.A.C. Additional information regarding how the financial assurance requirements will be met should be submitted. Rule reference: (62-701.710(2)(h), F.A.C.).

Citation Errors: Please note that the following citation errors were observed in the permit application. Please review, revise and resubmit the appropriate pages electronically for our records:

1. Tab 5, Attachment C.5:

- a. Page 6, 2.2.1 Process Knowledge: Incorrect Reference. Reference 40 CFR 261.**5(i)** is listed as reserved. Did you mean 40 CFR 261.**3(v)**?

- b. Page 7, 2.3 Acceptance Records: Incorrect Reference. Rule 62-710.510(1)(**c**), F.A.C. should read Rule 62-710.510(1)(**d**), F.A.C.
 - c. Page 8, 3.1 Off-specification Used Oil: Incorrect Reference in (6), end use of the oil. The reference (Rule 62-710.510(1)(**e**), F.A.C.) should read Rule 62-710.510(1)(**f**), F.A.C.
2. **Tab 8, Attachment C.9:**
- a. Page 1, Closure Plan, Introduction: Incorrect citation. Chapter 62-710.800(**9**), F.A.C. should read Chapter 62-710.800(**5**), F.A.C.
 - b. Page 2, Closure Procedures: Incorrect citation. 40 CFR **1**79.54(h)(ii) should read 40 CFR **2**79.54(h)(ii).
3. **Tab 9, Attachment C.10:** There are a few citation errors within your document titled, “A Brief Summary of the Rules and Regulations Applicable to a Used Oil Transporter Training Program.”
- a. Under B, Florida Law, #4: §403.708(**14**) should read §403.708(**12**)(**b**).
 - b. Under C, Department Rules:
 - i. #1: “(**85**) oily wastes and (**129**) used oil” should read “(**78**) oily wastes and (**122**) used oil.”
 - ii. #2: Rule 62-701.300(8**b**) should read Rule 62-701.300(8)(**a**).

USED OIL PROCESSING FACILITY PERMIT APPLICATION

Part I

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

A. General Information

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

2. Revision number _____

3. NOTE: Used Oil Processors must also meet all applicable subparts, (**describe compliance in process description for applicable standards**) if they are:

- _____ Generators (Subpart C of Part 279)
- _____ Transporters (Subpart E)
- _____ Burners of off-spec used oil (Subpart G)
- _____ Marketers (Subpart H)
- _____ are disposing of used oil (Subpart I)

4. Date current operation began: _____

5. Facility name: _____

6. EPA identification number: _____

8. Facility mailing address:

Street or P.O. Box City State Zip Code

9. Contact person: _____ Telephone: (____) _____

Title: _____ Email _____

Mailing Address:

Street or P.O. Box City State Zip Code

10. Operator's name: _____ Telephone: (____) _____

Mailing Address:

Street or P.O. Box City State Zip Code

11. Facility owner's name: _____ Telephone: (____) _____

Mailing Address:

Street or P.O. Box City State Zip Code

12. Legal structure:

- _____ Corporation (indicate state of incorporation) _____
- _____ Individual (list name and address of each owner in spaces provided below)
- _____ Partnership (list name and address of each owner in spaces provided below)
- _____ Other, e.g., government (please specify) _____

If an individual, partnership, or business is operating under an assumed name, enter the county and state where the name is registered: County _____ State _____

Name: _____

Mailing Address: _____

Street or P.O. Box City State Zip Code

Name: _____

Mailing Address: _____

Street or P.O. Box City State Zip Code

Name: _____

Mailing Address: _____

Street or P.O. Box City State Zip Code

Name: _____

Mailing Address: _____

Street or P.O. Box City State Zip Code

13. Site ownership status: ☐ owned ☐ to be purchased ☐ to be leased ____ years
☐ presently leased; the expiration date of the lease is: _____

If leased, indicate: Land owner's name: _____

Mailing Address: _____

Street or P.O. Box City State Zip Code

14. Name of professional engineer _____ Registration No. _____

Mailing Address: _____

Street or P.O. Box City State Zip Code

Associated with: _____

B. SITE INFORMATION

1. Facility location:

County: _____

Nearest community: _____

Latitude: _____ Longitude: _____

Section: _____ Township: _____ Range: _____

UTM # _____/_____/_____

2. Facility size (area in acres): _____

3. Attach a USGS contour map of the facility area, a 100 year flood plain exhibit, and scale drawings of the facility showing the location of all past, present and future material and waste receiving, storage and processing areas, including size and location of tanks, containers, pipelines and equipment. Also show incoming and outgoing material and waste traffic pattern including estimated volume and controls.

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

C. OPERATING INFORMATION

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

2. List applicable EPA hazardous waste codes:

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

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

4. A detailed description of the process flow should be included. This description should discuss the overall scope of the operation including analysis, treatment, storage and other processing, beginning with the arrival of an incoming shipment to the departure of an outgoing shipment. Include items such as size and location of tanks, containers, etc. A detailed site map, drawn to scale, should be attached to this description. [See item four (4), page four (4) of the instructions.]

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

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

- a. An analysis plan which must include:
- (i) a sampling plan, including methods and frequency of sampling and analyses;
 - (ii) a description of the fingerprint analysis on incoming shipments, as appropriate; and
 - (iii) an analysis plan for each outgoing shipment (one batch/lot can equal a shipment provided the lots are discreet units) to include: metals and halogen content

The analysis plan is labeled as Attachment _____

- b. A description of the management of sludges, residues and byproducts. This must include the characterization analysis as well as the frequency of sludge removal.

Sludge, residue and byproduct management description is labeled as Attachment _____

- c. A tracking plan which must include the name, address and EPA identification number of the transporter, origin, destination, quantities and dates of all incoming and outgoing shipments of used oil.

The tracking plan is included as Attachment _____

6. Attach a copy of the facility's preparedness and prevention plan. This requirement may be satisfied by modifying or expounding upon an existing SPCC plan. Describe how the facility is maintained and operated to minimize the possibility of a fire, explosion or any unplanned releases of used oil to air, soil, surface water or groundwater which could threaten human health or the environment. [See item six (6), page five (5) of the instructions.]

The preparedness and prevention plan is labeled as Attachment _____

APPLICATION FORM FOR A USED OIL PROCESSING PERMIT

PART II - CERTIFICATION

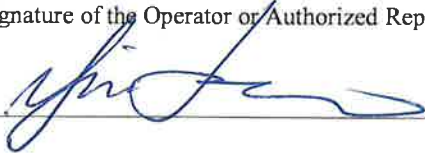
TO BE COMPLETED BY ALL APPLICANTS

Form 62-710.901(6) Operator Certification

Facility Name: Liquid Environmental Solutions of Florida, LLC EPA ID# FLD-981-928-484

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gathered and evaluated the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment or knowing violations. Further, I agree to comply with the provisions of Chapter 403, Florida Statutes, Chapters 62701 and 62-710, F.A.C., and all rules and regulations of the Department of Environmental Protection

Signature of the Operator or Authorized Representative*



Yuri Turovsky, Plant Manager
Name and Title (Please type or print)

Date: AUG 11 2017 Telephone: (904) 438-2138

* If authorized representative, attach letter of authorization.

C. OPERATING INFORMATION

4. Used oil process flow.

The attached plant diagram shows location and size of tanks used for management of used oil, PCW, and oily wastewater.

Incoming shipments of oily wastewater, PCW, or used oil are sampled and checked for acceptability at the receiving lab following the procedures set forth in the used oil analysis plan.

Acceptable loads are routed to specific tanks as follows:

- 1) Oily wastewater. This material is managed in Tanks 1 or 2 if the material is found to be compatible with other, similar material. It is routed to the cone bottom tanks if it requires segregated handling.
- 2) Used oil. Loads, which consist largely of used oil, are usually unloaded directly to one of the tanks in the oil processing portion of the facility.
- 3) PCW. Shipments received as PCW are unloaded to Tanks 81 and 82.

Processing involves the following:

- 1) Oily wastewater. Free oil is removed by phase separation and transferred to Tanks 4A, 4B or to the oil processing tanks. Wastewater is treated by dissolved air flotation, held in the discharge tanks, analyzed for various parameters as required by IDUP #019 (JEA) and discharged to the POTW.

Material requiring segregated treatment is managed in the cone bottom tanks. Treatment consists in the use of heat and/or chemicals to break emulsions. Treated water is transferred to discharge holding tanks for analysis and discharge. Oil is transferred to the oil management tanks for further processing. Solids are transferred to holding tanks for evaluation and de-watering, primarily by filter press and occasionally by centrifuge.

- 2) PCW. Product is phase separated, transferred to the oil processing tanks and sent off-site for energy recovery either separately or as a blend with processed used oil. Water associated with product is treated as necessary, held, analyzed and discharged to the POTW.

- 3) Used Oil. Used oil and used oil associated with wastewater are routed to the oil processing portion of the facility either directly, or through the intermediate holding tanks identified above. The oil is staged in Tanks 10, 12, 14, 18, 19, 20, 22, 23 51, 52, 53, and 101. Samples are taken to determine characteristics of the oil including water content, solids levels, viscosity, and any other factors affecting treatment. Bench testing may be done to determine the most effective treatment. Once a treatment has been selected, the oil is transferred to Tank 16 where it is heated to 180 degrees Fahrenheit, agitated, and treated with de-emulsifying

chemicals. The treated oil is then transferred to cool-down tanks 24, 25, 26, or 27, and held for two to four days. During that period, a water break occurs. The water is transferred to the cone bottom tanks for further treatment, if necessary, and eventual discharge to the POTW. The treated oil is then combined with other oil to make a batch of approximately 13,000 gallons or more in tanks 54, 55, and 56. Samples are taken of the batch of treated oil. These samples are sent to an outside lab where they are tested for arsenic, cadmium, lead, and chromium. These analyses may be performed in-house at the discretion of the Laboratory Manager. Once the analytical results are received, the oil is ready for shipment to end users or other used oil processors. Each batch is assigned a lot number for tracking purposes.

LES primarily handles bulk loads of oily water, used oil, and PCW. However, we occasionally handle drum quantities of these materials. The drums are staged at a designated point within the contained portion of the plant. Each set of drums is evaluated for acceptability pursuant to the used oil analysis plan. The drums are pumped off to oily water tanks, used oil tanks, or the solids holding tanks where the material is managed along with similar material from bulk loads. The empty drums are cleaned and either recycled or scrapped. LES is also considered a used oil transport and transfer facility.

USED OIL ANALYSIS PLAN

Liquid Environmental Solutions of Florida, LLC (LES)

1640 Talleyrand Avenue
Jacksonville, Florida 32206

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1.0 INTRODUCTION

This plan is intended for compliance with the requirements of 40 CFR § 279.55 and Chapter 62-710, F.A.C. This plan covers all used oil received, processed, and marketed by Liquid Environmental Solutions of Florida, LLC (LES). LES engages in transactions involving used oil, off-specification used oil fuel and on-specification used oil fuel.

This plan also covers the management of Petroleum Contact Water (PCW). The procedures covered by this plan are designed to comply with the requirements of Chapter 62-740, F.A.C.

LES has complied with the notification requirements of RCRA section 3010. LES' USEPA ID number is FLD981928484.

2.0 USED OIL ACCEPTANCE

2.1. Used Oil Acceptance Protocol

LES processes used oil and oily wastes generated by a wide variety of marine and industrial sources. Since there is a high degree of variability among these different sources, LES employs a combination of both process knowledge and sample analyses of halogen content to comply with the analysis requirements of 40 CFR § 279.53. However, at a minimum, LES samples and screens each used oil or oily waste shipment for Total Organic Halogens (TOH) using EPA Method 9077 (Dexsil Clor-D-Tect). No hazardous wastes or hazardous waste fuels are accepted by LES.

LES is occasionally engaged in transportation of Used Oil from generator sites to the LES plant. In doing so, LES does not pick up and transport any Used Oil from multiple generators on the same truck. When accepting Used Oil for processing from a third party transporter, LES does not accept Used Oil from multiple generators on the same manifest.

Before any oil or oily waste is accepted by LES, the generator must complete a Material Profile Form (MPF). The MPF is a document that provides LES with the generator's name, name of the material, volume, process generating the material, the characteristics of the material, if the material is or has been mixed with a hazardous waste, and a generator's certification. Generators may provide their own analyses, LES may have analyses performed by an outside laboratory, the LES Laboratory may perform in-house analyses or any combination of these will be used to support the generator's determination of the regulatory status of the material destined for LES. Samples accompany the MPF in some instances. The LES Laboratory makes the determination whether or not wastes or materials are acceptable under the permits issued to the facility. Once the LES Laboratory has approved the MPF, the generator is granted approval to deliver the material to the LES facility. As each shipment of

used oil or oily waste arrives at the facility, it is sampled at a vehicle staging area outside the LES Receiving Station. Receiving Station Personnel perform a visual inspection of the load and, depending on the physical nature of the load, select an appropriate sampling technique. A composite liquid waste sampler (coliwasa) is usually employed for bulk or drum sampling. A dipper or equivalent device may be used where the material is judged to be homogenous. At this point receiving personnel match the sample from the load to the initial profile. Each sample is screened using EPA Method 9077 at a minimum. No shipment is allowed to be offloaded until it is determined that the TOH content does not exceed 1,000 ppm, or in the case of materials exceeding that limit, the presumption that the used oil has been mixed with hazardous waste has been successfully rebutted and that it matches the initial profile. Oil and oily waste destined for LES that fails to meet the acceptable criteria are refused according to the procedure outlined in Section 2.4.

Parameters other than TOH may be analyzed at the laboratory's discretion for quality control purposes and assurance that no hazardous waste is accepted. All data recorded by laboratory personnel on incoming shipments of used oil and oily waste are entered in a Receiving Document Database (RecvDoc), referenced by generator name, manifest number, and date. Waste or materials received in drums or totes will be managed in the same manner. If other regulated compounds are expected to be present, samples of the oily waste will be sent to an outside laboratory to be analyzed. The oil or oily waste will not be unloaded until the LES Laboratory is satisfied that the material is not a hazardous waste or hazardous waste fuel. Approved EPA methods found in SW-846 are used.

The parameters applicable to oily waste acceptance that the LES Laboratory has the ability to perform onsite are listed in the table below.

Parameter	Method
pH	EPA 150.1
Flash Point	EPA 1010
TOH	EPA 9077
Metals (except Mercury)	EPA 6010

2.2 Rebuttable Presumption

Where TOH values exceed 1,000 ppm, it remains the responsibility of the generator of the presumed hazardous waste/used oil mixture to rebut the presumption. However, LES personnel will assist clients in this process through a number of means, including the gathering and analysis of process knowledge, sample preparation techniques, in-house laboratory analyses, and outside laboratory analyses.

2.2.1 Process Knowledge

Process knowledge alone may be sufficient to rebut the presumption if it is sufficiently well documented. Usually, process knowledge is used as a basis for determining the type(s) and scope of analytical testing to perform in order to rebut the presumption.

In the case of a chlorinated paraffin or other compounds not on the Appendix VIII list (40 CFR Part 261), it may be possible for the generator to demonstrate that the measured TOH level is due solely to the presence of the non-Appendix VIII compound based on process knowledge alone. LES may elect to accept and process mixtures of used oil and conditionally exempt small quantity generator's waste as referenced in 40 CFR 261.5(j) and 40 CFR 279.10 (b)(3). In any case, process knowledge serves to reduce the scope of analytical testing required to rebut the presumption by ruling out potential sources of contamination by Appendix VIII compounds.

2.2.2 Sample Preparation

Many TOH analysis techniques rely on the conversion of organically bound halogens to free halides with subsequent quantification of the free halide content by titration. The amount of free halide measured is then used to calculate the amount of organically bound halogens originally present.

Much of the used oil and oily waste brought to LES is derived from maritime sources and is likely to contain various concentrations of seawater. Since seawater contains a relatively high concentration of free halide (specifically, chloride), analysis of seawater-contaminated oil by many common techniques will yield falsely high values (false positives) for TOH. EPA Method 9077, the method employed by LES for used oil TOH analysis, will yield false positives with seawater-contaminated materials. Therefore, where process knowledge indicates free halide contamination, it is necessary to prepare the sample in order to remove as much of the contaminant as possible prior to analysis.

LES has developed a Standard Operating Procedure (SOP) for performing this sample preparation technique, which involves extracting the free halides with purified water after diluting the sample with iso-octane. Care must be taken through quality control measures to insure that the sample preparation technique does not unintentionally remove significant quantities of any organically bound halogens. This may be checked by comparing an analysis of the prepared sample with an analysis of a control sample containing a known concentration of a halogenated organic compound.

2.2.3 In-house Laboratory Analyses

LES employs EPA Method 9077 (Dexsil, Clor-D-Tect) for all in-house TOH analyses. This technique has been proven by experience to correlate well with analytical techniques involving elaborate equipment and time-consuming methods. The method relies on the use of metallic sodium to strip organically bound halogens from the hydrocarbon molecule and convert them to free halides. The free halides are subsequently titrated using a mercuric compound to an end-point denoted by a colorimetric indicator. The amount of the mercuric compound consumed is proportional to the amount of free halide present which, in turn, is proportional to the amount of organically bound halogens originally present in the sample. The test yields virtually no false negatives but can yield false positives where there is free halide contamination of the sample (e.g. seawater). Thus, the method is suited to the screening of samples for regulatory purposes as it is unlikely to allow true hazardous waste contamination to go undetected.

2.2.4 Outside Laboratory Analyses

Occasionally, the presumption may be rebutted only through qualitative and quantitative analyses. For these procedures, LES employs an outside laboratory to perform EPA 8260. This data is then used to determine the presence or absence of halogenated compound on the Appendix VIII list. A 100-ppm threshold is used to determine the presence of a compound. In other words, a level of 100 ppm or greater is taken as evidence that the used oil is contaminated with the compound in question.

2.3 Acceptance Records

LES maintains records of each used oil shipment accepted for processing. These records consist of entries in a computer database in conjunction with filed copies of invoices, manifests, bills of lading, and other shipping documents. The following information is recorded for each load of used oil accepted:

- (1) The name, address, and phone number of the transporter who delivers the used oil;
- (2) The name and address of the generator or processor/re-refiner from which the used oil was sent;
- (3) The name and address of the destination or processor/re-refiner where the used oil was received;
- (4) The EPA identification number of the transporter who delivered the used oil;
- (5) The EPA identification number (if applicable) of the generator or processor from whom the used oil was sent;

- (6) The EPA identification number (if applicable) of the destination or processor/re-refiner where the used oil was received;
- (7) The end use code designation;
- (8) The quantity of used oil accepted;
- (9) The type of oil accepted (per 62-710.510(1)(d), F.A.C.);
- (10) The date of acceptance; and
- (11) Documentation of halogen screening (per 62-710-210(2), F.A.C.)

The above records will be maintained on-site and available for inspection for at least three years.

2.4 Used Oil Refusal Procedure

In response to screening procedures by LES Laboratory Personnel, or for other reasons, a load of used oil arriving at the LES facility may be refused (for example, when the presumption that the used oil has been mixed with a hazardous waste cannot be satisfactorily rebutted). When a load of used oil is refused, LES Laboratory personnel will immediately inform Processing personnel that the used oil is not to be off-loaded. LES Laboratory personnel will then inform the appropriate LES Account Manager, regarding the status of the load. If the appropriate Account Manager is not available, the LES Sales Manager will be contacted. Once a member of the LES Sales Department has been alerted, the representative will contact the customer as soon as possible to convey the information that the load has been refused for acceptance by LES.

3.0 USED OIL EXPORT

3.1 Off-specification Used Oil

As a marketer of used oil, LES maintains a record of each shipment of used oil originating from its facility to used oil burners. These records take the form of a computer database in conjunction with filed hard copies of invoices, manifests, bills of lading, and other shipping documents.

LES records or may cross-reference the following information on each shipment of off-specification used oil:

- (1) The name and address of the transporter who delivers the off-specification used oil to the recipient;
- (2) The name and address of the recipient of the off-specification used oil;
- (3) The EPA identification number of the transporter who delivers the off-specification used oil to the recipient;
- (4) The EPA identification number of the recipient;
- (5) The quantity of off-specification used oil shipped;
- (6) The end use of the oil (per 62-710.510(1)(f), F.A.C.); and
- (7) The date of the shipment.

LES will only ship off-specification used oil to recipients who have notified the EPA of their activities according to the requirements of RCRA section 3010 and who possess an EPA identification number.

3.2 On-specification Used Oil Fuel

This section documents the policies and procedures employed by LES to meet the requirements of 40 CFR Part 279 Subpart H - "Standards for Used Oil Fuel Marketers" § 279.72, "On-specification used oil fuel".

Sample analyses are used to make specification determinations. The sampling method used for drums, tanks, or bulk loads are by coliwasa, or grab samples from an agitated (homogenous) tank.

Used oil is processed by LES in production lots; each is assigned a unique Oil Production Lot (OPL) number automatically by the OPL database. A completed OPL is sequestered in an individual storage tank prior to shipment off-site. LES analyzes oil production lots according to the following schedule:

METHOD	PARAMETER	SITE	FREQUENCY
EPA 6010	Metals	on	each batch sent to a burner
ASTM D93	Flash Point	on	each batch
EPA 9077	TOH	on	each batch
EPA 8080	PCB's	off	quarterly

Each OPL is analyzed according to the destination of the material. Each OPL destined for a burner will be analyzed for metals. OPL destined for other used oil processors or marketers will be analyzed at the discretion of the Laboratory Manager. OPL destined for other used oil processors or marketers will be deemed off-specification unless metals data is available to support an on-specification determination.

LES records or may cross-reference the following information on each shipment of on-specification used oil fuel:

- (1) The name and address of the transporter who delivers the on-specification used oil to the recipient;
- (2) The name and address of the recipient of the on-specification used oil;
- (3) The EPA identification number of the transporter who delivers the on-specification used oil to the recipient;
- (4) The EPA identification number of the recipient;
- (5) The quantity of on-specification used oil shipped;
- (6) The end use of the oil (per 62-710.510(1)(e), F.A.C.);

- (7) The date of the shipment; and
- (8) A cross-reference to the record of used oil analysis or other information used to make the determination that the oil meets the specification as required under § 279.72(a). As described above, this cross-reference consists of recording the oil production lot number on the appropriate shipping document(s).

The Used Oil export records will be maintained on-site and available for inspection for at least three years.

3.3 Additional Used Oil Analyses

Other used oil analyses are performed by LES for quality control purposes according to the following schedule:

METHOD	PARAMETER	FREQUENCY
ASTM D-95	% Water	each batch
ASTM D-4294/EPA 6010	% Sulfur	as required
ASTM D-1298	API Gravity	as required

These additional quality control tests may be performed either on-site or off-site at the discretion of the Laboratory Manager.

4.0 PCW ACCEPTANCE

LES accepts and processes PCW in compliance with the requirements of Chapter 62-740, F.A.C. Before any PCW is accepted by LES, the generator must complete a Material Profile Form (MPF). Included in this form is a written certification by the generator that the PCW does not contain levels of hazardous constituents above those found in the source of the PCW.

As each shipment of PCW arrives at the facility, it is sampled and analyzed to ensure the waste load matches the approved MPF. The finger print analysis includes the pH testing for the water phase and the TOH and Flash Point testing for the recoverable product phase. Solids from tank cleaning operations are not accepted as PCW.

LES does not mix or commingle PCW with any other material when accepting waste for transportation to the LES facility. When accepting material for processing from a third party transporter, LES does not accept PCW commingled with any other material not defined as PCW.

LES maintains records for each shipment of PCW received including the following:

- (1) Name and address of the PCW generator.
- (2) Name and address of the PCW transporter.
- (3) Date of receipt of the PCW shipment.
- (4) Volume of the PCW received.

(5) A copy of the manifest used for transportation of the PCW.

The PCW records will be maintained on-site and available for inspection for at least three years.

APPENDIX A
HANDLING CONTAMINATED MEDIA AND RESIDUES

HANDLING CONTAMINATED MEDIA AND RESIDUES

At the LES facility, oil contaminated media and residues fall into four categories: tank bottom solids, shaker solids and strainer basket debris, oil contaminated media and disposable items and other oil contaminated items such as non-disposable tools and equipment.

A.1 Tank Bottom Solids

LES manages its used oil operations to minimize the accumulation of tank bottom solids. However, it is conceivable that tank bottom solids might accumulate to a depth that could have an adverse impact on tank usefulness. If this should occur, at the discretion of the General Manager, the tank will be drained and the bottom solids pumped or otherwise removed to a suitable container. Should confined space entry be required to accomplish this task, a commercial tank-cleaning contractor may be employed.

Once the tank bottom solids have been removed, LES will attempt to reclaim as much oil as possible through various treatment methods including, but not necessarily limited to, heating, shaking, sieving, centrifugation, pressing, washing, and extraction. Reclaimed oil will be returned to processing.

Oil contaminated solids will usually be rich in BTU value and may be burned as fuel. Analytical testing establishing the tank bottom solids' suitability as fuel will be undertaken as specified by the prospective burner.

The solids generated at the plant and destined for disposal are randomly sampled twice per quarter and analyzed by an independent laboratory to determine if the material exhibits any characteristics of hazardous waste identified in Subpart C of 40 CFR Part 261. The samples are analyzed for the TCLP Metals, EPA Methods 6010 and 7470, and TCLP Organics, EPA Methods 8260 and 8270. Depending on the outcome of the analyses, the material will be disposed of at an appropriate hazardous waste or non-hazardous waste disposal facility.

A.2 Shaker Solids and Strainer Basket Debris

Strainer baskets catch debris as it is being pumped and thereby protect pumps from damage. A shaker is also employed to remove solids from oil. Every attempt is made to reclaim as much free oil from these materials as is possible. The remaining material will then be classified according to the nature of the substrate and a determination made as to the proper management pathway.

As described above, such materials may be suitable for use as fuel to recover energy. If this management pathway is selected, analytical testing to establish the material's suitability as fuel will be undertaken as specified by the prospective burner. If the oil contaminated materials must be disposed of as a waste, a sample will be analyzed by an independent laboratory to determine if the material exhibits any characteristics of

hazardous waste identified in Subpart C of 40 CFR Part 261. Depending on the outcome of the analyses, the material will be disposed of at an appropriate hazardous waste or non-hazardous waste disposal facility.

A.3 Contaminated Media and Disposable Items

Absorbent media such as clay, pads, booms, and disposable personal protective equipment will be treated to reclaim absorbed oil. Such treatment methods may include, but are not necessarily limited to heating, sieving, centrifugation, pressing, washing, and extraction. When all reclaimable oil has been removed the media will be placed into a covered accumulation drum labeled "Oily Waste". When this drum is filled, its contents will be sampled and analyzed by an independent laboratory to determine if the material exhibits any characteristics of hazardous waste identified in Subpart C of 40 CFR Part 261. Depending on the outcome of the analyses, the material will be disposed of at an appropriate hazardous waste or non-hazardous waste disposal facility.

A.4 Other Oil Contaminated Materials

Reusable items such as non-disposable personal protective equipment, tools, and equipment will be washed with detergent and water to remove oil. Free oil will be decanted or otherwise separated and returned to used oil processing. The rinseate will be treated to meet City of Jacksonville industrial user permit standards and discharged to the sanitary sewer.

1.0 BASIC INFORMATION

BASIC INFORMATION

LOCATION: Talleyrand Avenue and Seventh Street, Duval County, Florida

TYPE OF FACILITY: Industrial wastewater pretreatment and hydrocarbon recycling

FACILITY ADDRESS: 1640 Talleyrand Avenue, Jacksonville, Florida 32206

RIVER BASIN: St. Johns River

DESIGNATED
FACILITY CONTACT: Joel Williams, Process Supervisor

ALTERNATE
FACILITY CONTACT: Yuri Turovsky, Plant Manager

PRIMARY EMERGENCY
RESPONSE COORDINATOR: Joel Williams: Process Supervisor

EMERGENCY ACTION

In the event of a spill or leak from any tank or pipe, the senior responsible person at the site should carry out the following actions until he is relieved by someone with higher authority.

SAFETY FIRST

Take all actions necessary to protect the life and health of all persons in the area.

CALL FOR HELP

Notify local emergency authorities (fire, police, ambulance) as necessary. Call Liquid Environmental Solutions of Florida (LES) management and notify them of the situation.

STOP THE LEAK

Take actions to stop the flow of liquid if such can be done safely.

NOTIFY REGULATORY AGENCIES

In the event of a potentially dangerous situation, call the federal and state hotlines immediately to report the spill. If the situation is under control, fill out the questions on the spill form in Section 14 of this plan prior to calling the regulatory agencies. The information on the spill form is what the agencies will want to know.

4.0 CERTIFICATION, REVIEW AND AMENDMENTS

CERTIFICATION, REVIEW AND AMENDMENTS

Management Responsibility/Approval

In accordance with 40 CFR 112.7, the responsibility for spill prevention, control, and countermeasures has been placed with the Process Supervisor and, in his absence, the Plant Manager.

By signature, the above management personnel certify that they have approved this SPCC Plan and have the authority to commit the resources required for its implementation:

Signed: Earl A. Williams
Signed: [Signature]

Certification of Original Plan

Having examined the LES facility located at 1640 Talleyrand Avenue, Jacksonville, Florida, and being familiar with provisions of the Code of Federal Regulations Title 40, Chapter 1, Subchapter D Part 112, I certify that this SPCC Plan satisfies the requirements of 40 CFR Part 112 and has been prepared in accordance with good engineering practices.

Signed: [Signature] NOV 14 2017
Licensed Professional Engineer
Registration #: 23111

Date: NOV 14 2017
Review and Certification Due: June 1, 2014

NOV 14 2022



6.0 FACILITY DESCRIPTION

FACILITY DESCRIPTION

Liquid Environmental Solutions (LES) is an industrial wastewater pretreatment facility located at 1640 Talleyrand Avenue near the intersection of Talleyrand and 7th Street. The size of the facility is approximately 1.6 acres and the facility operates according to the following schedule:

Mon.— Fri.	7:00 a.m.— 11:00 p.m.
Sat.	7:00 a.m.— 7:00 p.m.

A site location map and site plan drawing are located in Section 13 of this plan.

LES accepts petroleum contaminated industrial wastewater and used oil from marine, petroleum, environmental and industrial sources. Oil is separated from oily wastewater by physical, mechanical, and chemical means and subsequently processed at a designated section of the LES facility, the Oil Dock, for marketing as used oil fuel. Wastewaters are then treated by various techniques including gravity separation, dissolved air floatation, heat treatment, and chemical batch treatment to meet JEA discharge permit standards and discharged to the Buckman Wastewater Treatment Facility. The Oil Dock area consists of 22 storage tanks and one treatment tank with a total oil storage capacity of 321,375 gallons. Tanks designated as wastewater storage tanks comprise a total volume of approximately 724,890 gallons.

There is no long-term storage of any material at LES. As a recycler of used oil, it is the policy of LES to separate this material as quickly as possible, refine it, and market it for use as fuel. Wastewater is also treated as soon as can feasibly be scheduled and once the effluent can be shown to meet the requirements of the discharge permit, it is discharged to the Buckman Wastewater Treatment Facility. A small stock of treatment chemicals is kept on hand to meet ongoing treatment needs.

Drainage

Stormwater from the facility is contained within the facility by berms, concrete filled block walls, and a concrete slab barrier. Stormwater is contained and drains to a sump located in the southeast corner of the facility that transfers the stormwater to an Oil Separator (Tank 44); from there it is treated and discharged to the Buckman Wastewater Treatment Facility.

A drainage ditch runs along the perimeter of the north end of LES. It flows into a ditch that runs along the east side of the property. This ditch empties into a concrete paved ditch at the southwest corner of the LES property. The concrete paved ditch flows east from that point and ultimately empties into the St. Johns River.

OIL STORAGE TANK LIST

TANK NO.	CAPACITY (gallons)	USE
10	4,800	Oil/Solids
12	7,800	Specialty Oil
14	9,750	Low Flash Diesel
16	16,075	Heating Oil
17	1,200	Fuel Products
18	9,950	Low Flash Diesel
19	7,800	Low Flash Diesel
20	7,800	Low Flash Diesel
21	8,000	Fuel Products
22	7,800	Low Flash Diesel
23	9,950	Low Flash Diesel
24	15,000	Cooldown Staging Area
25	15,000	Cooldown Staging Area
26	15,000	Cooldown Staging Area
27	15,700	Cooldown Staging Area
51	15,000	Raw Oil
52	15,000	Raw Oil
53	85,000	Raw Oil
54	19,000	Retail Oil
55	9,750	Retail Oil
56	20,000	Retail Oil
101	6,000	Raw Oil
TOTAL: 21 Tanks	321,375	

7.0 POTENTIAL SPILL SOURCES, CONTAINMENT & CONTROL EQUIPMENT

POTENTIAL SPILL SOURCES, CONTAINMENT, & CONTROL EQUIPMENT

Potential Spill Sources

Potential spill hazards identified at the LES facility include releases due to accidents, equipment failure releases, or overflows from aboveground treatment and storage tanks for wastewater and waste oil. All ancillary equipment in conjunction with these tanks such as pipes, pumps and valves are also potential spill sources. Another potential spill source is from the loading/unloading of tankers at the designated off-loading sites. Potential spill sources have been thus categorized:

Area 1 - Bulk storage for oil and wastewater

Area 2 - Truck loading and offloading

Each area that has been identified as a potential spill source, and the maximum total quantity of material which could be discharged at one time as a result of a major failure is listed below.

Area 1 - 85,000 gallons (Tank 53)

Area 2 - 7,000 gallons (fully loaded tanker)

Containment and Diversionary Structures

The LES facility has been designated and constructed for maximum containment to prevent any discharge from reaching a navigable water course.

The entire facility has been designed and constructed for complete containment safety and is fully lined with concrete. Tanks 3, 4 and the oil dock lie at the high end of the plant. Berms to the west and north of tanks 3 and 4 serve to contain and redirect potential spills toward the system of moats and dikes found within the perimeter containment wall. The Oil Dock is set within a walled enclosure which drains to a sump at a lower point within the plant.

The walled enclosure has been calculated to be of sufficient volume to contain the largest storage tank (85,000 gallons), and provide for sufficient freeboard to allow for precipitation. The walled enclosure and concrete slab barrier is sufficiently impervious to allow for containment of spilled material.

Secondary containment capacity of the plant is 273,380 U.S. Gallons. Secondary Containment Calculation are included in the Spill Prevention, Control and Countermeasure Plan (SPCC) as Appendix C.

SPCC APPENDIX C

SECONDARY CONTAINMENT CALCULATIONS

for

Jax - Fat-Oil-Grease (FOG) Tanks 112, 113, 114 & 115

Liquid Environmental Solutions of Florida, LLC

M&A Project No.: 9122-41-1



Joseph A. Mittauer, P.E.

FL Registration No. 23111

JAN 31 2017



MITTAUER
& ASSOCIATES, INC.
CONSULTING ENGINEERS &
PROJECT FUNDING SPECIALISTS
CERTIFICATE OF AUTHORIZATION NO. 6569



MITTAUER
& ASSOCIATES, INC.
CONSULTING ENGINEERS

580-1 Wells Road Phone: (904) 278-0030
Orange Park, FL 32073 Fax: (904) 278-0840

Subject: Updated Secondary Containment Calc.
Project: Fet. Oil/Grease (FOG) Storage Tanks
Client: Liquid Environmental Solutions, Inc.
Job No.: 9122-41-1 Sheet No.: 1 of 2
Designed By: JAM Date: 1-30-17

HISTORICAL INFORMATION

Reference Updated Secondary Containment Volume Calculation, dated 2-7-15 under project 9122-38-1, Sheets 1-4 which also reference the original containment calculations prepared 3-26-01 under project 9122-15-1, Sheets 1-10, (Revised 11-1-02).

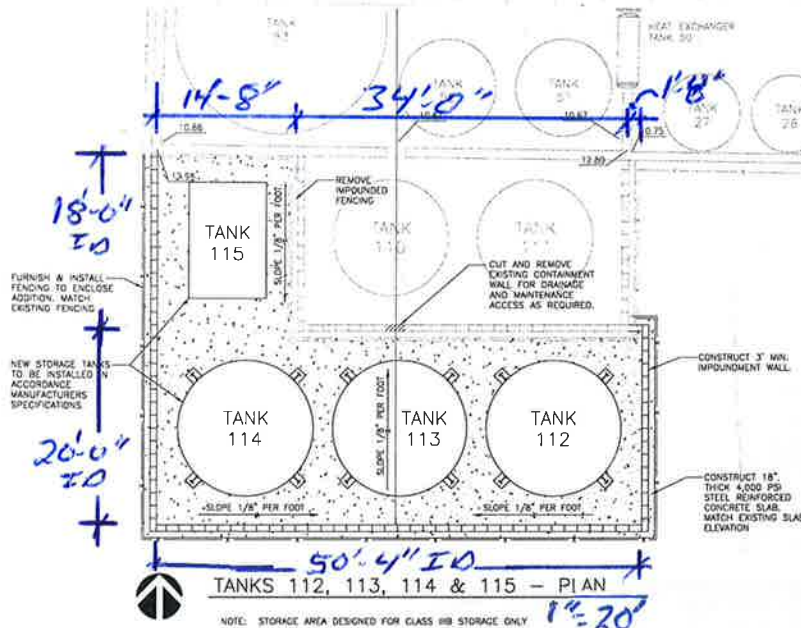
CHANGES IN CONTAINMENT VOLUME

As part of this project (9122-41-1) FOG Tanks 112, 113, 114 & 115 are being added.

The Containment Area for these tanks will be incorporated into the overall plant containment.

The added containment area has an inside footprint of 14'8" x 18'5" = 271 SF. The new finish floor elevation will be 10.88' and higher, which is above the top of the containment wall at the lowest of the plant tanks is elev. 10.0'.

-NO NET CHANGE-





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580-1 Wells Road Phone: (904) 278-0030
Orange Park, FL 32073 Fax: (904) 278-0840

Subject: Updated Secondary Containment Vol. Cal.
Project: FOG Tanks 112, 113, 114 & 115
Client: Lig. Env. Solutions, Inc.
Job No.: 9122-44 Sheet No.: 2 of 2
Designed By: JAR Date: 1-30-17

REQUIRED CONTAINMENT CAPACITY

Reference Sheet 4 of 9122-38-1 calculations

The available secondary containment capacity is 273,380 gallons.

The required capacity was 93,500 gallons at 12,500 cfs.
Based on 11072 at the largest tank, which is an 85,000 gallon tank.
Tanks 112-115 will not change this. Therefore,

Available Capacity: 273,380 gallons > 93,500 gallons required.

∴ OK as is.



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580-1 Wells Road Phone: (904) 278-0030
Orange Park, FL 32073 Fax: (904) 278-0840

Subject: Updated Secondary Containment ^{TVd.}
Project: Used Oil Facility
Client: Liquid Env. Solutions (prev. IWS)
Job No.: 9122-381 Sheet No.: 1 of 4
Designed By: JAM Date: 2-7-15

HISTORICAL INFORMATION

Reference Updated Secondary Containment Volume Calculations Dated 3-26-01, Revised 11-1-02, sheets 1-10, as attached. These are the original containment calculations made for the prior (original) owner Industrial Waste Services, Inc. (IWS). Since the 11-1-02 calculations were prepared, several tank replacements were made along w/ an increase in the containment area which is part of this permit modification.

CHANGES IN CONTAINMENT CAPACITY - Secondary

7	9/13/12	JZ	REMOVED TANKS 3A, 3B, 4A, 4B ADDED TANKS 102-109
6	10/05/07	WF	REMOVED TANK 48, NEW TANKS 17 & 35A
5	10/17/05	JZ	REMOVED TANKS 45 & 46, NEW TANK 45
4	7/9/04	JZ	REVISED TANK 5, 11, 13, 15, 16, 17, 18a, 20, 28,
3	4/1/03	JZ	REVISED SECOND TANK 11 AS TANK 101
2	12/27/02	JZ	RELABELED TANKS 6, 38, 39, 81 & 82, DELETED TANK 29
1	11/1/02	JZ	REMOVED TANKS 12, 13, 14, 15, 16, 17, 18 & 20 ADDED TANKS 11, 12, 13, 14, 15, 16, 17, 18, 18a, 20, 28 & 29
NO	DATE	BY	REVISION DESCRIPTION

CHANGES IN CONTAINMENT #1 & 2

Tank 11 was included 1-10-02 calculations the 1-8-02 set, pg. 9 of 10. Tanks 12, 13, 14, 15, 16, 17, 18 & 20 were replacements with less capacity tanks. The diameters were the same but they were not as tall. Because they were taller than the containment wall, there was no change in containment volume. Tanks 18a, 28 & 29 were added, but later removed.
- No Net Change -

CHANGES IN CONTAINMENT #3 & 4

This was further relabeling of tanks w/ - No Net Change -



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580-1 Wells Road Phone: (904) 278-0030
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Subject: Updated Secondary Containment Vol.
Project: Ward Oil Facility
Client: Liquid Environmental Solutions
Job No.: 9122-381 Sheet No.: 2 of 4
Designed By: JTK Date: 2-7-15

CHANGES IN CONTAINMENT #5

This was the removal & replacement of the DAF unit, Tank 45 & 44. Also removal of the centrifuge, Tr 46. Generally, there are elevated liquids & the changes are minimal, with a slight gain in containment available which will be issued.
- No Net Change -

CHANGES IN CONTAINMENT #6

Remove Tank 48. Skid Dryer, Scrubber & Hyd. Unit

$$29' \times 6' + 4' \times 6' + 3' \times 3' = 207 \text{ SF area}$$

General Finish Floor Elev = 8.3

$$\text{Increase in Volume available} = (10' - 8.3') \times 207 \text{ SF} =$$

$$+ 352 \text{ CF}$$

Add Tank 17

This is a 1,300 gallon tank 8' Ø at FF Elev of 9.5'

$$\text{Loss of available Volume} = (10.0' - 9.5') \left(\pi \left(\frac{8'}{2} \right)^2 \right) =$$

$$- 25 \text{ CF}$$

Add Tank 35A

This is an 11,650 gallon tank 8' Ø at FF Elev of 6.3'

$$\text{Loss of available Volume} = (10' - 6.3') \left(\pi \left(\frac{8'}{2} \right)^2 \right) =$$

$$- 186 \text{ CF}$$

$$\text{Net change} = + 141 \text{ CF}^{\text{gain}}$$

CHANGES IN CONTAINMENT #7

Remove Tanks 3, 3A, 4 & 4A (note this yet to be done)

$$(47' \times 16' \times 2) \text{ (Elev } 10.0' - 9.0') = \text{Increase in Vol. available} =$$

$$+ 940 \text{ CF}$$

Add Tanks 102-109

$$8 \text{ tanks @ } \left(\pi \left(\frac{8'}{2} \right)^2 \right) \times (10.0' - 8.5') = \text{Loss of Vol. available} =$$

$$- 503 \text{ CF}$$

$$\text{Net Change} = + 337 \text{ CF}^{\text{gain}}$$



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580-1 Wells Road Phone: (904) 278-0030
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Subject: Updated Secondary Containment Vb1
Project: Wood O.I. Facility
Client: Liquid Environmental Solutions
Job No.: 9122381 Sheet No.: 3 of 4
Designed By: JAM Date: 2-8-15

CHANGES IN CONTAINMENT #8 (Current Modification)

Add **FOG** Tanks 110 & 111, Also add additional containment area.
Add Containment Area

Min 33' x 18' (Elev. B.O. - 10.88)

Note Finish Floor is above Top of Containment Wall at lower end, there for added area provides no additional storage volume. Likewise, the two new 12' tanks do not displace any of the containment volume because they are above the 100' wall ft at the lower end of the plant.
- No Net Change -

Changes In Containment - Tank #5

Note Tank No. 5 was removed after the 3-26-01 411-102 codes & revisions. This had been the largest Oil tank at 210,000 gallons. New Tank 53, with capacity of 85,000 gallons, has the largest capacity as a regulated tank.

Remove Tank 5

36' ϕ , Avg. H.F. Elev = 8.5'

Increase in Containment Vol cap: $\pi \left(\frac{36}{2}\right)^2 (10.0 - 8.5) = +1527 \text{ CF}$

NEW CONTAINMENT CAPACITY BASED ON TANK CHANGES

Containment Capacity per Codes revised 11-102 (Pg. D-110) 34,543 CF

Change in Capacity Due to Change #1-5

- No Change -

Change in Capacity due to Change #6

+ 141 CF

Change in Capacity due to Change #7

+ 337 CF

Change in Capacity due to Change #8

- No Change -

Change in Capacity due to Elimination of Tank #5

+ 1527 CF

Total Provided Containment 36,548 CF

OR 273,380 gallons



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580-1 Wells Road Phone: (904) 278-0030
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Subject: Updated Secondary Containment Val.
Project: Ureod Oil Facility
Client: Liquid Environmental Solutions
Job No.: 9122-381 Sheet No.: 4 of 4
Designed By: JAN Date: 2-8-15

REQUIRED CONTAINMENT CAPACITY

Note Tank No 5 (210,000 gallons) is no longer at the facility. The largest capacity regulated tank is No. 53 with capacity of 85,000 gallons.

40 CFR, part 279, Subpart F - Standards for Ureod Oil Producers and Refiners requires secondary containment but does not have specifics. A standard in the industry is to provide 110% of the largest tank.

$$\text{Reqd capacity} = 110\% \times 85,000 \text{ gallons} = 93,500 \text{ gallons} \\ \text{or } 12,500 \text{ CF}$$

Available Capacity 273,380 gallons \gg 93,500 gallons
is OK as is.

MITTAUER & ASSOCIATES, INC.
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4611-4 U.S. Highway 17
Orange Park, FL 32073
Tel: (904) 278-0030
Fax: (904) 278-0840

Subject: Updated Secondary Containment
Project: Used Oil Facility
Client: Industrial Water Services
Job No.: 9122-15-1 Sheet No.: 1 of 10
Calculated By: JAS Date: 3-26-01
Revised 11-1-02

HISTORICAL INFORMATION

Reference 7-31-97 "Secondary Containment Volume" calculations.
by M&A Job No. 9122-15-1 sheets 1-4 > sheets 1-10
(& M&A Job No. 9122-21-1)

The required containment Volume is 110% of the largest Tank
Tank #5 = 210,000 gallons

$$\text{Req'd. Vol.} = 110\% \times 210,000 \text{ gallons}$$

$$= 231,000 \text{ gallons or } 30,900 \text{ CF}$$

$$\text{Vol. Provided} = 270,000 \text{ gallons or } 36,090 \text{ CF}$$

The top of the containment wall is Elev. 10.0'
any additional tanks or equipment in the containment
area that is below elev. 10.0 will reduce
the available containment volume as provided
in the 7-31-97 calculations.

CHANGES IN CONTAINMENT CAPACITY

1 May 3, 1999 M&A letter to DEP

Modify Tank No. 27 (add to height), relocate tank No. 44,
Add Tank Nos. 30, 47, 51, 52, 53, 54, 60, 61, 62.

2 March 13, 2000 M&A letter to DEP

Remove Tank Nos. 8, 10, 11, 28, 40, 82B
Add Tank Nos. 10, 54, 55, 70, 71 & 72

3 February 14, 2001 M&A letter to DEP

Remove Tank No. 9, Add Tank Nos. 7, 8, 9 & 56

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CONSULTING ENGINEERS

4611-4 U.S. Highway 17

Orange Park, FL 32073

Tel: (904) 278-0030

Fax: (904) 278-0840

Subject: Updated Secondary ContainmentProject: Wood 01 For: 1.6Client: ILUSJob No.: 9122-15-1 Sheet No.: 2 of 10Calculated By: JAY Date: 1-8-02CHANGES IN CONTAINMENT CAPACITY (CONTINUED)

4 January 10, 2002 M&A letter to DEP
Add Tank No. 11

5 November 1, 2002 M&A letter to DEP
Remove Tanks 12, 13, 14, 15, 16, 17, 18, 20
Add New Tanks 11, 12, 13, 14, 15, 16, 17, 18, 20, 28, 29

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CONSULTING ENGINEERS

4611-4 U.S. Highway 17

Orange Park, FL 32073

Tel: (904) 278-0030

Fax: (904) 278-0840

Subject: Updated Secondary Containment Vol. Calcs.

Project: Used Oil Facility

Client: I.W.S.

Job No.: 9122-151 Sheet No.: 3 of 10

Calculated By: JAW Date: 3-26-01

1 MAY 3, 1999 TANK CHANGES

Modify Tank No. 27

The capacity of the tank was increased by raising and adding on to the top of the tank. No changes occurred below elevation 10.0'

Change in Tank Displacement = -0-

Relocate Tank No. 44

This tank is an elevated oil-water separator. No changes were made in the volume of displacement below elevation 10.0'

Change in tank displacement = -0-

Add Tank No. 30

This is a 500 gallon tank which is elevated on legs. The body of the tank is above elev. 10.0'

Change in displacement = -0-

Add Tank No. 47

This is an 8'0" ϕ , 4,200 gallon DAF clarifier which is elevated on legs. The body of the tank is above elev. 10.0'

Change in displacement = -0-

Add Tank No. 51

This is a 10'0" ϕ , 15,000 gallon tank with a finish floor elev. of $\pm 10.65'$. The body of the tank is above elev. 10.0'

Change in displacement = -0-

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CONSULTING ENGINEERS

4611-4 U.S. Highway 17

Orange Park, FL 32073

Tel: (904) 278-0030

Fax: (904) 278-0840

Subject: Updated Secondary ContainmentProject: Used Oil FacilityClient: IWSJob No.: 9122-15-1 Sheet No.: 4 of 10Calculated By: JAY Date: 3-26-01Add Tank No. 52

This is a 10'-0" ϕ , 15,000 gallon tank with a finish floor elev. of $\approx 10.65'$ (same as #51). The body of the tank is above Elev. 10.0'

Change in displacement - 0

Add Tank No. 53

This is a 22'-0" ϕ 85,000 gallon tank with a finish floor elevation of $\approx 10.75'$. The body of the tank is above elev. 10.0'

Change in displacement - 0

Add Tank No. 54

This is an elevated, horizontal cyclind type heat exchanger. The body of the tank is above elev. 10.0'.

Change in displacement - 0

Add Tank No. 60

This is a 10'-6" ϕ , 12,000 gallon vertical tank with a finish floor elev. $\approx 7.2'$

Area of tank = 86.59 SF Depth = $10.0 - 7.2 = 2.8'$

Volume of displacement = $86.59 \times 2.8 = 242.5 \text{ cf}$
(loss of containment vol. capacity)

Add Tank No. 61

This is an 11' x 23' rectangular tank, 8,000 gallon cap. with a finish floor elev. $\approx 7.4'$

Area of Tank = $11 \times 23 = 253 \text{ sf}$, Depth = $10.0 - 7.4 = 2.6'$

Volume of displacement = $253 \text{ sf} \times 2.6' = 657.8 \text{ cf}$

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CONSULTING ENGINEERS

4611-4 U.S. Highway 17

Orange Park, FL 32073

Tel: (904) 278-0030

Fax: (904) 278-0840

Subject: Updated Secondary ContainmentProject: Wood O.I. FacilityClient: IWSJob No.: 9122-15-1 Sheet No.: 5 of 10Calculated By: JAM Date: 3-26-01Add Tank No. 62

This also is an 11'x23' rectangular tank 8000 gallon cap.
with a finish floor elev. $\approx 7.5'$

Area of tank = $11 \times 23 = 253 \text{ sf}$, Depth = $10.0 - 7.5 = 2.5'$

Volume of Displacement: $253 \text{ sf} \times 2.5' = -632.5 \text{ cf}$

TOTAL LOSS OF CONTAINMENT CAPACITY

$-242.5 - 657.8 - 632.5 \text{ cf} = -1,532.8 \text{ cf loss}$

Z MARCH 13, 2000 TANK CHANGESRemove Tank No. 8

This is an 8'-0" ϕ tank which is laying horizontal and is 43' long. It is on 11,000 gallon tank with a finish floor elev. $\approx 9.0'$

Area based on 1' depth = 3.62 sf , length = 43'

Volume of displacement: $3.62 \text{ sf} \times 43' = +155.7 \text{ cf}$

Remove Tank No. 10

This is an 8'-0" ϕ , 6,000 gallon tank with a finish floor elev. $\approx 7.9'$

Area of tank 50.27 sf , Depth = $10.0 - 7.9 = 2.1'$

Volume of Displacement = $50.27 \text{ sf} \times 2.1' = +105.6 \text{ cf}$

Remove Tank No. 11

This is an 8'-0" ϕ , 6,000 gallon tank with a finish floor elev. $\approx 7.92'$

Area of tank = 50.27 sf Depth = $10.0 - 7.92 = 2.08'$

Volume of Displacement = $50.27 \text{ sf} \times 2.08' = +104.6 \text{ cf}$

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Orange Park, FL 32073

Tel: (904) 278-0030

Fax: (904) 278-0840

Subject: Updated Secondary ContainmentProject: Used Oil FacilityClient: IWSJob No.: 9122-15-1 Sheet No.: 6 of 10Calculated By: JAA Date: 3-27-01Remove Tank No. 28

This is a 3'x8' rectangular 360 gallon tank with a finish floor elev. $\approx 10.0'$. The body of the tank is above elev. 10.0'.

Change in displacement = -0-

Remove Tank No. 40

This is an 8'-0" ϕ tank with a finish floor elev. of $\approx 8.1'$

Area of tank = 50.27 sq ft Depth = 10.0 - 8.1 = 1.9'

Volume of displacement = 50.27 sq ft \times 1.9' = + 95.5 cu ft

Remove Tank No. 82B

This is an 8'-0" ϕ , 1,000 gallon tank with a finish floor elev. $\approx 8.0'$.

Area of tank = 50.27 sq ft, Depth = 10.0 - 8.0 = 2.0'

Volume of displacement = 50.27 \times 2.0 = + 100.5 cu ft

Add Tank No. 10 (New tank #10)

This is a rectangular tank 8'x18', 4,800 gallon with a finish floor elev. $\approx 7.9'$

Area of tank = 144 sq ft, Depth = 10.0 - 7.9 = 2.1'

Volume of displacement = 144 sq ft \times 2.1' = - 302.4 cu ft

Add Tank No. 54

This is a 10'-0" ϕ , 19,000 gal. Tank with a finish floor elev. $\approx 10.9'$. The body of the tank is above elev. 10.0'

Change in displacement = -0-

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Orange Park, FL 32073

Tel: (904) 278-0030

Fax: (904) 278-0840

Subject: Updated Secondary ContainmentProject: Used Oil FacilityClient: IWSJob No.: 9122-151 Sheet No.: 7 of 10Calculated By: JAN Date: 3-27-01Add Tank No. 55

This is an 8'0" ϕ , 10,000 gallon tank w/o
finish floor elev. $\approx 10.9'$. The body of the tank
is above elev. 10.0'.

Change in displacement: -0-

Add Tank No. 70

This is a 10'0" ϕ , 9,500 gallon tank w/o
finish floor elev. $\approx 7.78'$

Area of Tank: 78.54 sq ft, Depth: $(10.0 - 7.78) = 2.22$

Volume of Displacement: $78.54 \text{ sq ft} \times 2.22' = 174.4 \text{ CF}$

Add Tank No. 71

This is a 10'0" ϕ , 6,500 gallon tank with a
finish floor elev. $\approx 8.02'$. This is a cone bottom
tank where the body of the tank is above elev. 10.0'.

Change in displacement -0-

Add Tank No. 72

This is also a 10'0" ϕ , 6,500 gallon tank that
is a cone bottom tank where the body of the
tank is above elev. 10.0'.

Change in displacement -0-

TOTAL GAIN OF CONTAINMENT CAPACITY

+ 155.7 + 105.6 + 104.6 + 95.5 + 100.5 - 302.4 - 174.4 CF

= + 85.1 CF gain.

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4611-4 U.S. Highway 17

Orange Park, FL 32073

Tel: (904) 278-0030

Fax: (904) 278-0840

Subject: Updated Secondary ContainmentProject: Used Oil FacilityClient: IWSJob No.: 9122-15-1 Sheet No.: 8 of 10Calculated By: JAN Date: 3.27.013 FEBRUARY 14, 2001 TANK CHANGESRemove Tank No. 9

This is an 11'6" rectangular 40,000 gallon tank with a finish floor elev. of 7.0'

Area of tank: 701.5 sq ft, Depth = 10.0' - 7.0' = 3.0'

Volume of Displacement: 701.5 sq ft x 3.0' = +2,104.5 CF

Add Tank No. 7

This is a 13'0" dia, 23,000 gallon tank with a finish floor elev. of 7.0'

Area of Tank = 132.73 sq ft, Depth = 10.0' - 7.0' = 3.0'

Volume of Displacement = 132.73 sq ft x 3.0' = -398.2 CF

Add Tank No. 8

This is a 10'6" dia, 23,000 gallon tank with a finish floor elev. of 7.0'

Area of tank = 86.59 sq ft, Depth = 10.0' - 7.0' = 3.0'

Volume of Displacement = 86.59 sq ft x 3.0' = -259.8 CF

Add Tank No. 9

This is a 10'0" dia, 22,000 gallon tank with a finish floor elev. of 7.0'

Area of tank = 78.54 sq ft, Depth = 10.0' - 7.0' = 3.0'

Volume of Displacement = 78.54 sq ft x 3.0' = -235.6 CF

Add Tank No. 56

This is a 8'0" dia, 6,000 gallon tank with a finish floor elev. of 10.68'. The body of the tank is above elev. 10.0'

Change in Displacement

-0-

TOTAL GAIN OF CONTAINMENT CAPACITY

+2,104.5 - 398.2 - 259.8 - 235.6 CF =

1,210.9 CF Gain

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CONSULTING ENGINEERS

4611-4 U.S. Highway 17

Orange Park, FL 32073

Tel: (904) 278-0030

Fax: (904) 278-0840

Subject: Updated Secondary Containment

Project: Used Oil Facility

Client: IWS

Job No.: 9122-151 Sheet No.: 9 of 10

Calculated By: JAY Date: 1-8-02

4 JANUARY 10, 2002 TANK CHANGES

Add Tank No. 11

This is an 8'0" dia tank, 6,000 gallon tank with a finish floor elevation of ≈ 9.0

Area of tank = 50.3 sq ft Depth = $10.0 - 9.0 = 1.0$

Volume of Displacement = $50.3 \text{ sq ft} \times 1.0' = -50.3 \text{ CF}$

5 NOVEMBER 1, 2002 TANK CHANGES

IWS will be filling in the entire used oil tank pit. In the original notes, we used a volume of 1,260 CF for this area. Since we will fill it up to the surrounding elev. which is an avg. elev. of 9.80, we will ignore the minimal storage between elev. 10.00 and 9.80, which would have been reduced by the tank footprints anyway. Thus the loss of containment volume is 1,260 CF.

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CONSULTING ENGINEERS

4611-4 U.S. Highway 17

Orange Park, FL 32073

Tel: (904) 278-0030

Fax: (904) 278-0840

Subject: Updated Secondary Containment Calc.

Project: Used Oil (Fac. 11)

Client: IWS

Job No.: 9122-15-1 Sheet No.: 10 of 10

Calculated By: JAM Date: 3-27-01

NEW CONTAINMENT CAPACITY BASED ON TANK CHANGES

Initial Containment Volume Capacity as of 7-31-97 36,090 CF

Loss of Capacity due to May 3, 1999 Tank Changes - 1,533 CF

Gain in Capacity due to March 13, 2000 Tank Changes + 85 CF

Gain in Capacity due to Feb. 14, 2001 Tank Changes + 1,211 CF

Loss in Capacity due to Jan 10, 2002 Tank Changes - 50 CF

Loss in Capacity due to Nov, 1, 2002 Containment Changes - 1,260

New Containment Capacity = 34,543 CF

OR 258,400 gallons

REQUIRED CONTAINMENT CAPACITY

Tank No. 5 is still the largest tank (OW) or (O) at the facility. Tank 5 has a capacity of 210,000 gallons.

Required Secondary Capacity = $110\% \times 210,000 \text{ gallons}$

= 231,000 gallons

OR 30,900 CF

Available Capacity = 258,400 gallons > Req'd. Cap. = 231,000 gallons

Therefore Secondary Containment Capacity is adequate.

10. Determine and record the exact type of material, approximate amount of spill, duration of discharge and cause of incident. Record the information on the Spill Report Form located in Section 14 of this Plan.
11. Complete proper cleanup and prepare for the disposal of the spilled material.
12. Report any spill event or potential spill to management personnel to ensure compliance with environmental regulations.

Major Spill Events

In response to major spill events which may pose significant danger to life or property, immediately notify the Fire Department and at least one of the following members of the LES Spill Control Team:

<u>NAME</u>	<u>TITLE</u>	<u>PHONE</u>	<u>ADDRESS</u>
* Joel Williams	Process Supervisor	(904) 349-5352	6507 Blue Leaf Ln. Jacksonville, FL 32244
** Yuri Turovsky	Plant Manager	(904) 509-2032	11549 Sedgemoore Drive S. Jacksonville, FL 32223

* denotes Primary Emergency Response Coordinator

** denotes Alternate Emergency Response Coordinator

The above personnel will notify the Governing State and Federal regulatory agencies in the event the release goes beyond the confines of the facility boundaries.

- National Response Center: (800) 424-8802
- Florida Department of Environmental Protection: (904) 256-1700
- State Warning Point: (904) 413-9911 & (800) 320-0519

In case of a major spill that requires evacuation of the operating facility, take the following actions in order listed:

1. Sound the evacuation/emergency alarm located at the north side of DAF unit. Direct all personnel to leave the area.
2. If possible, contain and isolate the source of the spill to minimize the volume of material to be cleaned up.
3. Be prepared and standby for organized spill cleanup.

In the event that a discharge reaches the St. Johns River of such magnitude that water quality standards may be violated, the release may be harmful to human health or the environment, or

11.0 FACILITY INSPECTION AND RECORDS

FACILITY INSPECTION AND RECORDS

Weekly Inspection

A formal visual inspection of tanks, piping systems and oil loading/unloading facilities will be conducted on a weekly basis. The results of the visual inspection will be recorded on the Inspection Report Log. The individual performing the inspections will be designated by the Plant Manager. The designated inspector will observe and document the following:

1. Oil leaks or potential oil leaks from:
 - Tank Shells
 - Valves
 - Flanges
 - Pipe Joints
2. Unlocked valves, pump/valve electrical starter controls
3. Open ended/uncapped pipes and open valves
4. Malfunctioning equipment, level and temperature indicators, valves, pumps, etc.
5. Condition of containment systems
6. Quantity (inventory) and condition of equipment and or materials necessary to properly control oil spills in accordance with the SPCC Plan
7. Warning signs and other safety-related items
8. Tanks/containers used for petroleum contact water (PCW) shall be inspected for leaks and deterioration per 62-740.100(2)(e).

The inspector will complete, date, sign, and submit the weekly inspection report form to the Plant Manager, who shall determine appropriate corrective action.

Periodic Inspections

Periodic inspections of the facility will be conducted at least once a year or more often as deemed necessary by the Plant Manager.

The inspector shall examine the following:

1. External condition of tanks, pumps, piping, etc.

2. Internal tank inspections as necessary (pitting, corrosion, etc.)
3. Defects or flaws in support structures
4. Condition of external protective coatings
5. Tank wall thickness shall be measured as deemed necessary

The inspector shall complete, date, and sign the Periodic Inspection Report and submit it to the Plant Manager who shall then make a timely report of corrective action as required

The inspector shall perform follow-up inspections as required to effect compliance and enter a report of performance to the records file.

Testing

A hydrostatic pressure test, interior visual inspection, ultrasonic wall test or other relevant measure of tank integrity will be performed as determined by the Plant Manager and inspector.

Records

Records of all Weekly Inspection Reports, Periodic Inspection Reports and related records shall be retained on file for a minimum of three years.

14.0 INSPECTION AND REPORTING FORMS

SPCC ANNUAL INSPECTION LOG

EQUIPMENT	INSPECTION	YES	NO
TANKS PUMPS PIPING	EXTERNAL CONDITION SATISFACTORY		
TANK	INTERNAL INSPECTION CONDUCTED		
SUPPORT STRUCTURES	DEFECT OR FLAW FREE		
EXTERNAL PROTECTIVE COATINGS	GOOD CONDITION		
TANK WALL THICKNESS	ADEQUATE		
TANK TESTING REQUIRED	TANK NUMBERS TYPE TEST		
INSPECTOR:	DATE:		
PETROLEUM CONTACT WATER	LEAKS OR DETERIORATION		
SUBMITTED TO GENERAL MANAGER			

Explosions

In the event of an explosion, the following events will occur:

1. If it can be safely activated, the fire alarm will be triggered indicating plant evacuation is necessary. The fire alarm is located within the plant next to the DAF unit and the triggering of this alarm will alert all employees within the compounds of the plant to evacuate immediately. Upon activation of the fire alarm, the fire department will be contacted from a telephone by dialing 911.
2. All personnel will evacuate the plant area via the described evacuation routes detailed in the diagram located in Section B-VII of this plan. The diagram indicates several evacuation routes in the event that one route may be blocked by releases of hazardous waste or fires.
3. After plant evacuation, the Emergency Coordinator will ensure all personnel are accounted for and out of the endangered area.
4. In the event contracted emergency response teams or state emergency response teams assistance is required, the Emergency Coordinator will coordinate their assistance from a telephone located in the administrative office or sales office.
5. Local authorities arriving at the scene will receive a copy of this Plan and be advised on the current situation by the Emergency Coordinator.

Chemical Spills

In the event of a chemical spill in quantities which may require an evacuation, the Emergency Coordinator will activate the internal alarm system and order an evacuation until the type and amounts of material spilled can be assessed. If more than one type of chemical is involved, situations may arise regarding incompatibilities. In the event this occurs the Laboratory Manager will be contacted to assess the situation.

If the spill can be handled safely by the LES spill team, clean up procedures will be implemented. In the event, the situation cannot be accurately assessed and safely handled by the LES spill team, the Emergency Coordinator will contact the fire department and outside emergency response contractors for immediate response. During an assessment or actual response to spill with potential exposure hazards present, all spill team personnel will be required to don the appropriate personal protection equipment to prevent the exposure to hazardous materials.

The Command Post Area, located at the LES Administrative Office, is located across the street from the physical plant, is the area to convene for assessing any emergency response actions to take place.

**Facility Evacuation Route Plan
follows Page 31 as Attachment C-7e.2**

APPENDIX A
ROSTER OF PERSONNEL

ROSTER OF PERSONNEL

November 6, 2017

NAME	TITLE	PHONE	ADDRESS
* Joel Williams	Process Supervisor	(904) 349-5352	6507 Blue Leaf Ln. Jacksonville, FL 32244
** Yuri Turovsky	Plant Manager	(904) 509-2032	11549 Sedgemoore Dr S. Jacksonville, FL 32223

* Primary Emergency Response Coordinator

** Alternate Emergency Response Coordinator



 <p>liquid ENVIRONMENTAL SOLUTIONS <i>Clean. Reliable. Innovative.</i></p>	Standard Operating Procedure	Doc	OPL-1506-03
	Title: Hurricane Procedures	Version	1.0
		Effective Date	1/1/2015
Group: Ops (Plant)	Owner: VP Operations	jeff.pocisk@liquidenviro.com	

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 <p>liquid ENVIRONMENTAL SOLUTIONS <i>Clean. Reliable. Innovative.</i></p>	Standard Operating Procedure		Doc	OPL-1506-03
	Title: Hurricane Procedures		Version	1.0
			Effective Date	1/1/2015
Group: Ops (Plant)	Owner: VP Operations		jeff.pocisk@liquidenviro.com	

Description

- Hurricane Preparation is to make sure that all equipment is either locked up in a safe place or moved to a location of less of a threat for damage and to secure buildings and property as best as possible prior to a hurricane.

Roles

- LES Plant Personnel

Systems

- None

Tools

- None

Definitions

- None

Standard Operating Procedure

Section 1

5-7 Days Out


1. Monitor Track of Hurricane, keep all employees updated on the track

72 Hours Out

1. Meet with supervisors and management to re-interact the drills and procedures that we have in place
2. Identify loose and potentially dangerous items around the plant and have them tied down or moved.

48 Hours Out

1. Make sure that all process tanks are filled to the 1/2 full level and all tanks are secure and valves are closed off, pumps are disconnected and secured in Maintenance Shed and power is shutoff to any equipment not in use.
2. Hatches are closed and secured on rail cars
3. All non-essential employees are relieved to take care of families/homes.

 liquid ENVIRONMENTAL SOLUTIONS <i>Clean. Reliable. Innovative.</i>	Standard Operating Procedure		Doc	OPL-1506-03
	Title: Hurricane Procedures		Version	1.0
			Effective Date	1/1/2015
Group: Ops (Plant)	Owner: VP Operations		jeff.pocisk@liquidenviro.com	

24 Hours Out

1. All office equipment is taken off the floors, computers taken home by each employee.
2. Any company paperwork that could not be replaced or duplicated is taken home by whomever the General Manager designates.
3. Equipment that is too large to remove is covered in plastic and taped up and placed away from windows.
4. All computer information is backed up by the corporate office
5. All rolling equipment is driven to higher ground; forklifts are put in the warehouse.
6. All office windows are boarded, facility is secured.
7. Final walk thru and meeting between managers and supervisors to ensure facility is properly secure
8. Everyone leaves the plant.

After the hurricane the general manager or alternate safety coordinator will allow employees back to the plant to start an assessment of the plant facilities.

Required Approvals

List the team members responsible for approving the process

Approver	Title	Initials
Gene Cookson	COO	

Revision History

List the version, effective date, a description of the version (sections revised) and the name of the person responsible for the changes

Version	Effective Date	Description	Initials
1.0	11/3/2014	Original Version	Jeff Pocisk

C. OPERATING INFORMATION

8. Unit Management Plan.

a) Containers:

LES manages drums and totes containing used oil, oily wastewater, and oily residues. Acceptance of containers of this material is handled pursuant to the LES Used Oil Analysis Plan.

Drums and totes containing used oil, oily wastewater, or oily residues, are managed within the contained portions of the facility. The containers are labeled used oil when accepted within the facility. Used oil and oily wastewater are pumped off to appropriate tanks within the facility. The containers are washed thoroughly and are either recycled or scrapped. Rinse water is managed in the facility along with other oily wastewater. Residues are pumped from the containers through Tank #10 to remove grit and debris. Remaining residue slurries are filter pressed along with similar material from other processes within the plant.

All containers are inspected weekly, pursuant to the facility inspection plan, to be certain that aisle space is adequate, that containers are appropriately labeled, not leaking or otherwise unsuitable for handling the contents and that they are being managed within the contained area of the facility.

b) Tanks and related equipment:

Tanks and related pipelines, valves, pumps and other ancillary equipment are shown in the plant diagram. All tanks are either carbon or stainless steel, inspected routinely pursuant to the facility inspection plan, and maintained in sound condition. All tanks are labeled used oil, oil/wastewater, PCW, wastewater, or wastewater/solids.

Pipelines are welded steel, with flanged connections for pumps, valves, and other equipment. The pipelines and related equipment are inspected regularly and necessary action taken to repair leaks, blockage, or malfunctions.

The secondary containment for the facility has a total calculated capacity of approximately 278,600 gallons. The largest tank at the facility, Tank 53, has a capacity of 85,000 gallons. The minimum secondary containment capacity required for the facility is 110% of 85,000 or 93,500 gallons. Calcs. are included in the SPCC, Appendix C.

The containment floor is a reinforced concrete slab. The walls are either concrete block filled with concrete or formed reinforced concrete. The slab is sloped to a sump located in the southeast corner of the contained area. The sump is equipped with a level actuated submersible pump, which transfers stormwater and any released material to holding tanks.

All stormwater and any releases within the contained area are managed within the facility pursuant to the process procedures outlined in C.4, above.

C. OPERATING INFORMATION

9. CLOSURE PLAN

INTRODUCTION

This plan is intended to fulfill the requirements of 40 CFR 279.54(h), Chapters 62-710.800(5), 62-701.710(6), and 62-701.710(2)(f). The plan outlines the procedures necessary for closure of the used oil management portions of the LES facility. The attachments include a schematic plant diagram, schedule of analytical methods required for closure, rinseate and residues characterization, soils sampling and analysis protocol, and groundwater sampling and analysis protocol.

LES will maintain a copy of an approved closure plan on site until the Department has accepted certification of closure. LES will submit an updated and detailed closure plan to the Department at least 60 days prior to the scheduled closing of the facility. LES will provide written notice to the Department at least 60 days prior to the date final closure is to begin. Within 30 days of completion of closure, LES will submit to the Department a certification signed by an officer of LES and by an independent registered professional engineer stating that the portion of the facility subject to used oil regulation has been closed in accordance with the specifications and procedures set forth in the closure plan.

CLOSURE PROCEDURES

The management units to be closed pursuant to this plan include the tanks and containers used to manage used oil, PCW and oily wastewater; pipelines, valves, pumps and other associated equipment and the related secondary containment. The various units to be closed are shown on the attached diagram.

Upon closure, all the tanks, containers and associated equipment will be emptied and cleaned to remove all liquids and any residual solids. All material removed from the units will be processed on-site with treated wastewater discharged to the POTW, recovered hydrocarbons sent off-site to an end user or used oil processor and solids sent off-site to an appropriate disposal facility. All material will be properly characterized as described in the attachment and either processed on-site or sent off-site for disposal at an appropriate disposal facility.

All tanks, containers and associated equipment will be rinsed and cleaned using an appropriate detergent and pressure washed or otherwise cleaned as necessary. After cleaning, the units will be triple rinsed. When cleaned to acceptable standards, tanks, containers and associated equipment will be sold, scrapped or placed in other service. Acceptable standards will be determined by the facility(ies) accepting the tanks, containers and associated equipment. This will be documented by LES. All rinseate and cleaning residuals will be managed on-site or sent off-site for appropriate disposal.

LES Closure Plan

Attachment C.9.2

Schedule of Analytical Methods

<u>Material</u>	<u>Metals</u>	<u>TRPH</u>	<u>Volatiles</u>	<u>Semi-volatiles</u>	<u>EOX / TOX</u>
Residues *	EPA 6010B	EPA 8015B	EPA 8260B	EPA 8270C	EPA 9023
Groundwater	EPA 6010B	EPA 8015B	EPA 8260B	EPA 8270C	EPA 9020B
Soils	EPA 6010B	EPA 8015B	EPA 8260B	EPA 8270C	EPA 9023

* Tank residues will be analyzed according to the nature of the material. If the residue contains significant amounts of recoverable oil, analysis may be limited to EPA 9023.

APPENDIX C

TANK INSPECTION & INTEGRITY TEST PLAN

TANK INSPECTION & INTEGRITY TEST PLAN

The Tank Inspection & Integrity Test Plan (Plan) for Liquid Environmental Solutions of Florida, LLC (LES) Jacksonville Plant is designed to meet the requirements of 40 CFR 112. The Plant's petroleum storage tanks are listed in Section 6.0 of the SPCC plan. All tanks are above ground storage tanks (AST) located within the concrete secondary containment which meets the definition of release prevention barrier (RPB). The tanks are elevated above the concrete slab so that the facility operator can visually detect release.

Based on the individual tank capacity, configuration, type of construction, and the continuous release detection method employed by the Plant, LES petroleum storage tanks are subject to the Steel Tank Institute SP001 Tank Inspection & Integrity Test Standards, Category 1.

Tanks containing Petroleum Contact Water (PCW) require weekly inspection. Weekly inspections shall be documented using the STI SP001 Monthly Inspection Checklist, which is attached at the end of this Appendix. The record of inspection shall be retained for 3 years per 62-740.100(2)(e) and 62-740.100(6)(f).

All tanks require monthly visual inspections conducted in accordance with STI SP001 Section 6. The monthly inspections shall be documented using the STI SP001 Monthly Inspection Checklist, which is attached at the end of this Appendix. The record of the inspection shall be retained for 3 years.

In addition, all petroleum storage tanks require the periodic formal inspections as listed below.

Tank No.	Capacity, gallons	Construction	Age, yrs	Formal External Inspection (SP001 Section 7)	Formal Internal Inspection (SP001 Section 8)	Leak Test (SP001 Section 9)
10	4,800	Shop Fabricated	>20	Every 20 years	Not required	Not required
12	7,800	Shop Fabricated	>20	Every 20 years	Not required	Not required
14	9,750	Shop Fabricated	>20	Every 20 years	Not required	Not required
16	16,075	Shop Fabricated	>20	Every 20 years	Not required	Not required
17	1,200	Shop Fabricated	>20	Every 20 years	Not required	Not required
18	9,950	Shop Fabricated	>20	Every 20 years	Not required	Not required
19	7,800	Shop Fabricated	>20	Every 20 years	Not required	Not required
20	7,800	Shop Fabricated	>20	Every 20 years	Not required	Not required
21	8,000	Shop Fabricated	>20	Every 20 years	Not required	Not required
22	7,800	Shop Fabricated	>20	Every 20 years	Not required	Not required
23	9,950	Shop Fabricated	>20	Every 20 years	Not required	Not required

24	15,000	Shop Fabricated	>20	Every 20 years	Not required	Not required
25	15,000	Shop Fabricated	>20	Every 20 years	Not required	Not required
26	15,000	Shop Fabricated	>20	Every 20 years	Not required	Not required
27	15,700	Shop Fabricated	>20	Every 20 years	Not required	Not required
51	15,000	Shop Fabricated	15	Every 20 years	Not required	Not required
52	15,000	Shop Fabricated	15	Every 20 years	Not required	Not required
53	85,000	Field Erected	15	Every 5 years	Every 10 years	Not required
54	19,000	Shop Fabricated	>20	Every 20 years	Not required	Not required
55	9,750	Shop Fabricated	>20	Every 20 years	Not required	Not required
56	20,000	Shop Fabricated	>20	Every 20 years	Not required	Not required
101	6,000	Shop Fabricated	>20	Every 20 years	Not required	Not required

Formal tank inspections were conducted on June 2013 by KB Inspection Services, Jacksonville, FL. Job No. LQ0530135J

Additionally, Tank 4A and Tank 4B are not included or covered by this Plan, as these tanks are currently slated for closure.

2.0 Summary of Regulations

2.1 Federal Used Oil Rule – 40 CFR 279

This rule is divided into sections which are applicable to different categories of used oil management. Our Mobile activities are subject to regulation under Subpart F – Standards for Used Oil Processors, Subpart E - Standards for Used Oil Transporters, Subpart H – Standards for Used Oil Fuel Marketers.

2.2 Florida Used Oil Rule 62-710 F.A.C.

This rule incorporated the federal rule by reference. The bulk of the Florida rule is concerned with applicability, notification, reporting, and permitting.

There is a section of the Florida rule which applies to the management of used oil filters. This part of the rule prohibits disposal of oil filters in landfills. Liquid Environmental Solutions uses oil or fuel filters in equipment such as the diesel diaphragm pump and the boilers. When these filters are replaced, the used filter is placed in a drum with an appropriate label. When this drum is filled, we will send it off site for disposal to a registered used oil filter processor such as Clark Environmental. Alabama has no regulation regarding disposal of used oil filters. Liquid Environmental Solutions does manage accordingly.

2.3 Florida PCW Rule 62-740 F.A.C.

The PCW rule is a Florida rule which allowed the management of petroleum contact water (PCW) outside RCRA. This rule took effect at the end of 1995. To handle PCW, a facility must either be a RCRA permitted operation or be permitted as a used oil management facility. Liquid Environmental Solutions handles PCW as a permitted used oil processor. ADEM does not regulate PCW or has a rule regarding PCW.

2.4 Other Requirements

Pursuant to the regulations, Liquid Environmental Solutions is required to have a used oil analysis plan and an SPCC plan (refer to 4.2). Copies of these are available from your supervisor.

2.5 Summary of the Rules and Regulations Applicable to Used Oil

New and current drivers need to understand the federal and state regulations governing used oil. Attached at the end of this Manual is a brief summary of these regulations, referenced from FDEP's website.

3.0 Used Oil Analysis Plan

2.0 Summary of Regulations

2.1 Federal Used Oil Rule – 40 CFR 279

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2.4 Other Requirements

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2.5 Summary of the Rule and Regulations Applicable to Used Oil

New and current drivers need to understand the federal and state regulations governing used oil. Attached is a brief summary.

referenced from <http://www.dep.state.fl.us>

A Brief Summary of the Rules and Regulations Applicable to a Used Oil Transporter Training Program

Note: The following summary is provided in an attempt to simplify some of the legal language found in the Laws, Rules and Regulations pertaining to the management of used oil in Florida. This summary is incomplete and not comprehensive. Only certain parts of the applicable citations are summarized here. This is not a substitute for and does not replace the actual language found in the Laws, Rules and Regulations cited. For copies of the original documents, please contact the Used Oil Coordinator, FDEP, 2600 Blair Stone Road, MS 4560, Tallahassee, FL, 32399-2400; or phone (850) 245-8755.

Both State and federal regulations apply to the management of used oil. The federal regulations are found in Chapter 40, Part 279 of the Code of Federal Regulations (CFR) (to view go to <http://www.gpoaccess.gov/cfr/index.html>). The State laws regarding used oil are found in Chapter 403.75 through 403.769 of the Florida Statutes (F.S.) (Florida Statutes can be found at <http://www.leg.state.fl.us/Statutes/index.cfm?Tab=statutes&submenu=-1&CFID=56371064&CFTOKEN=21118445>). The specific management standards for used oil in Florida are found in Chapters 62-701 (Solid Waste Management Facilities) and 62-710 (Used Oil Management) of the Florida Administrative Code (F.A.C) (to view these rules go to http://www.dep.state.fl.us/waste/quick_topics/rules/default.htm).

A. Federal Rules (Code of Federal Regulations, C.F.R.)

- 1. 40 CFR, Part 279.40** This section (Subpart E) describes the used oil management standards which are applicable to used oil transporters (persons who transport used oil) and transfer facilities (facilities which store used oil for over 24 hours, but less than 35 days).
- 2. 40 CFR, Part 279.41** Transporters cannot process used oil.
- 3. 40 CFR, Part 279.42** Transporters must have an EPA identification number.
- 4. 40 CFR, Part 279.43** Transporters must deliver used oil to another transporter, processor or burner which has an EPA identification number. All discharges of used oil must be managed by taking immediate action to protect human health and the environment.
- 5. 40 CFR, Part 279.44** The transporter must use either product knowledge or testing to determine whether the halogen content of the used oil to be picked up is above or below 1,000 parts per million.
- 6. 40 CFR, Part 279.45** Used oil transporters are subject to all applicable Spill Prevention, Control and Countermeasures (40 CFR Part 112) in addition to the requirements of this subpart.

Used oil must be stored at a transfer facility which has notified (has an EPA identification number) and has secondary containment. Used oil cannot be stored at a transfer facility for longer than 35 days. (40 CFR, Part 279.45(a))

Containers and aboveground tanks used to store used oil at transfer facilities must be labeled clearly with the words "Used Oil" (40 CFR, Part 279.45(g))

- 7. 40 CFR, Part 279.46** Transporters must keep records of all used oil accepted and delivered for three years. The records must include the name, address, EPA identification number and signature of the person who provided or accepted the used oil, the quantity of used oil handled and the date of delivery.

B. Florida Law (Florida Statutes, FS.)

1. **§403.121** DEP may recover damages for any injury to the air, waters, or property of the State. DEP may impose a \$10,000 penalty for each offense (**each day of violation is a separate offense**).
2. **§403.141** Anyone who pollutes may be held jointly and severally liable (anyone involved in the chain of custody, from the generator through the final destination can be held liable for the pollution).
3. **§403.161** It is a violation of state law to cause pollution, fail to comply with any laws or rules, make false statements regarding these laws and rules or fail to report discharges. There are three types of violations: a) anyone who willfully pollutes is guilty of a third degree felony, punishable by \$50,000 and/or 5 years imprisonment for each offense; b) anyone who pollutes, due to reckless indifference or gross careless disregard, is guilty of a second degree misdemeanor, punishable by \$5,000 and/or 60 days in jail for each offense; and c) anyone who fails to comply with any laws or rules is guilty of a first degree misdemeanor, punishable by \$10,000 and/or 60 months in jail.
4. **§403.708 (1)** No person shall deposit any solid waste in or on the land or waters located within the State. **(12)(b)** No person shall dispose of used oil in landfills.
5. **§403.751** No person may manage used oil in any manner which endangers public health or welfare. No person may discharge used oil into any storm drain, sewer, septic tank or body of water. No person may mix used oil with solid waste that is to be disposed of in a landfill. No person may mix used oil with a hazardous substance. Used oil shall not be used for road oiling, dust control, weed abatement or other similar activities that have the potential to harm the environment.
6. **§403.754** Used oil transporters and transfer facilities must register annually, keep appropriate records and report to the Department
7. **§403.7545** Nothing shall prohibit the Department from regulating used oil as hazardous waste. (If violations occur, and the used oil portion of the mismanagement, spill, or contaminated site is considered a hazardous waste, fines are automatically \$50,000 per offense).
8. **§403.767** Anyone who transports more than 500 gallons of used oil over public highways must be certified by the Department. Certification includes demonstration of adequate training and insurance.

C. Department Rules (Florida Administrative Code, F.A.C.), found in:

62-701, F.A.C., Solid Waste Management Facilities

62-710, F.A.C., Used Oil Management

62-740, F.A.C., Petroleum Contact Water

1. **62-701.200** Training should include definitions of **(78)** oily wastes and **(122)** used oil.
2. **62-701.300 (8a)** No person shall dispose of used oil in a landfill. **(11)** No person may commingle used oil with solid waste that is to be disposed of in a landfill.
3. **62-710.401 (4)(5)** Prohibitions: No person may mix or commingle used oil with hazardous substances (exception found in 40 C.F.R.279.10(b)(3)); used oil shall not be used for pavement oiling for dust control, weed abatement, or other similar uses that have the potential to release used oil into the environment.
4. **62-710.500** Used oil transporters and transfer facilities must register with the Department.
5. **62-710.510** Used oil transporters must, on the appropriate forms, keep records (for three years) and provide an annual report to the Department. Any shipment of used oil which is refused pick-up due to

suspected mixing with hazardous waste (halogens above 1,000 parts per million) must be recorded; a copy of this record must be left with the generator.

6. **62-710.600** Used oil transporters who transport over 500 gallons per year over public highways must be Certified by the Department by showing evidence of adequate training and insurance.
7. **62-710.850** Persons involved in the management of used oil filters must comply with this section.
8. **62-710.901(2)** This Used Oil Record Keeping form, or another form with the same information, must be used and maintained on-site for three years.
9. **62-740**, Declaration of Intent
10. **62-740**, Applicability
11. **62-740**, Definitions
12. **62-740**, General
13. **62-740**, Management Practices for Producers of PCW Product Recovery
14. **62-740**, Management Practices for Transporters Shipping PCW for Product Recovery
15. **62-740**, Management Practices for Recovery Facilities

ATTACHMENT A – SOLID WASTE PROCESSING FACILITY DESCRIPTION

LIQUID ENVIRONMENTAL SOLUTIONS OF FLORIDA, LLC

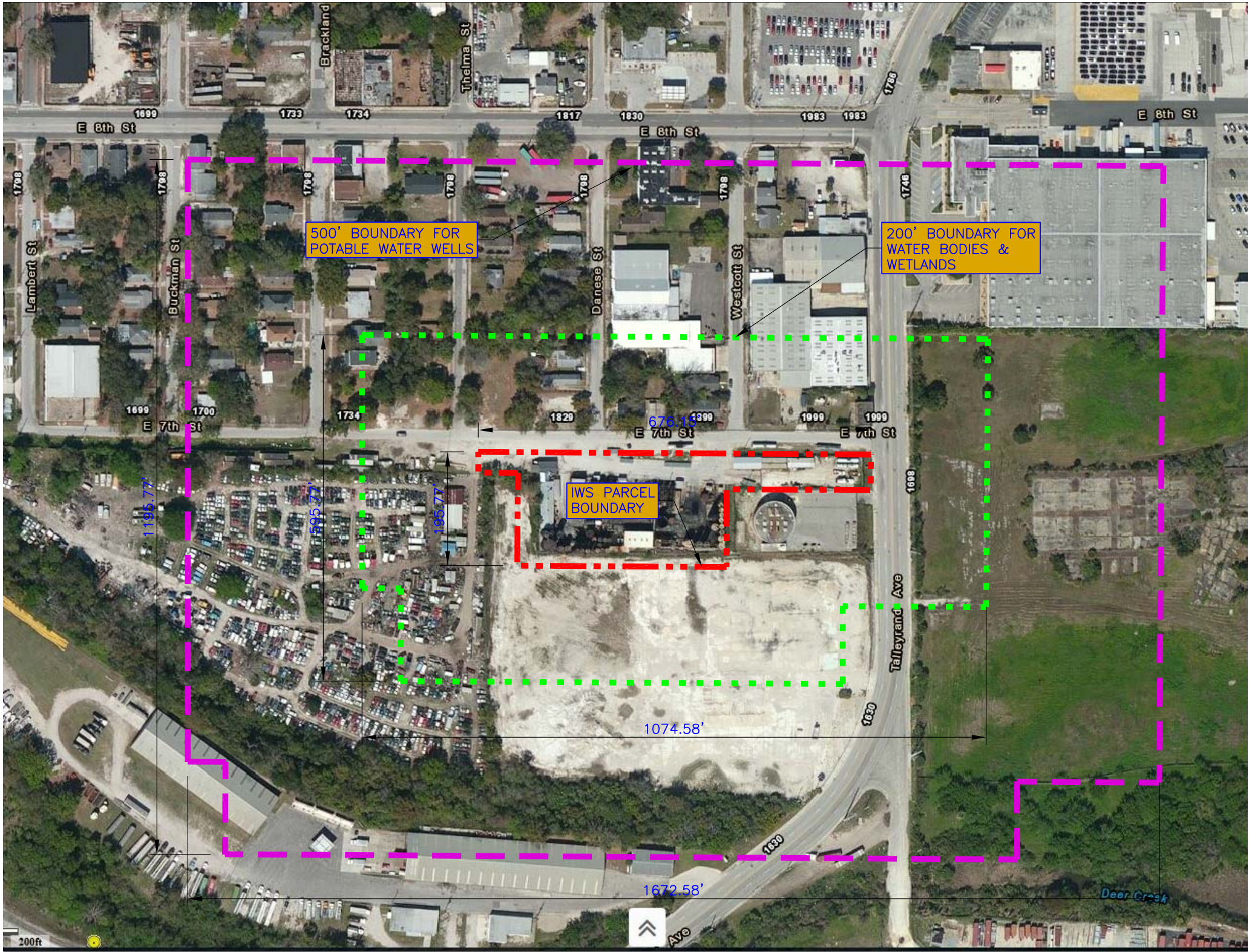
Project No. 9122-34-1

Dated: August 2017

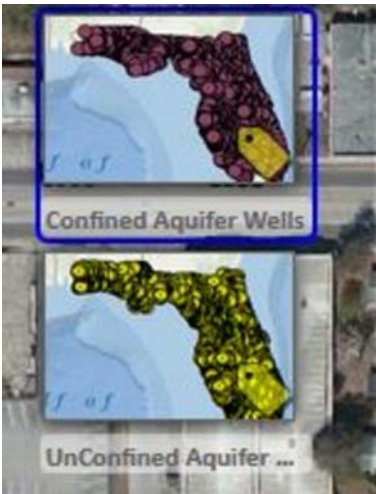
Liquid Environmental Solutions of Florida, LLC (LES) Jacksonville Facility (DEP ID No. FLD 981-928-484) generates industrial solid waste onsite from a variety of wastewater treatment processes, including: gravity separation, dissolved air flotation, filter press dewatering, and solidification. The solid waste generated from these processes is placed into 20-yard roll-off containers and shipped to an industrial landfill for disposal.

The quantity of solid waste generated and shipped offsite is approximately 150 tons per month. LES does not store any solid waste onsite.

Operational records include a daily log of the quantity of solid waste received, processed, stored, and removed from the site for recycling or disposal, and the county of origin of the waste, if known. These records include each type of solid waste, recovered materials, residuals, and unacceptable waste which is processed, recycled, and disposed. Records are stored digitally and are available for inspection by the Department. Records are retained at the facility for three years minimum, and back up records are maintained, and updated on a regular schedule.



MAP EXHIBIT LAYERS SHOWING



WATER BODIES & WETLANDS WITHIN 200' – NONE
POTABLE WATER WELLS WITHIN 500' – NONE

MAP SOURCE: FLORIDA DEPARTMENT OF ENVIRONMENTAL PROTECTION GIS STANDARD MAP WITH CONFINED & UNCONFINED POTABLE WATER WELLS DISPLAYED.
<https://ca.dep.state.fl.us/mapdirect/?focus=standard>

Parcels

Real Estate #: 115338 0030
Owner: INDUSTRIAL WATER SERVICES INC
Address: 1640 TALLEYRAND AVE
City: JACKSONVILLE
Zip Code: 32206
Acres: 1.6



MITTAUER
 & ASSOCIATES, INC.
 CONSULTING ENGINEERS

580-1 WELLS ROAD, ORANGE PARK, FLORIDA 32073
TEL. (904) 278-0030 FAX. (904) 278-0840 FLORIDA CA No. 6569

LIQUID ENVIRONMENTAL SOLUTIONS OF FLORIDA, LLC
Used Oil Processing Facility Permit
Site Plan for Water & Wells Locations
Jacksonville, Florida

ATTACHMENT A – SOLID WASTE PROCESSING FACILITY DESCRIPTION

LIQUID ENVIRONMENTAL SOLUTIONS OF FLORIDA, LLC

Project No. 9122-34-1

Dated: August 2017

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C. OPERATING INFORMATION

9. CLOSURE PLAN

INTRODUCTION

This plan is intended to fulfill the requirements of 40 CFR 279.54(h), Chapters 62-710.800(5), 62-701.710(6), and 62-701.710(2)(f). The plan outlines the procedures necessary for closure of the used oil management portions of the LES facility. The attachments include a schematic plant diagram, schedule of analytical methods required for closure, rinseate and residues characterization, soils sampling and analysis protocol, and groundwater sampling and analysis protocol.

LES will maintain a copy of an approved closure plan on site until the Department has accepted certification of closure. LES will submit an updated and detailed closure plan to the Department at least 60 days prior to the scheduled closing of the facility. LES will provide written notice to the Department at least 60 days prior to the date final closure is to begin. Within 30 days of completion of closure, LES will submit to the Department a certification signed by an officer of LES and by an independent registered professional engineer stating that the portion of the facility subject to used oil regulation has been closed in accordance with the specifications and procedures set forth in the closure plan.

CLOSURE PROCEDURES

The management units to be closed pursuant to this plan include the tanks and containers used to manage used oil, PCW and oily wastewater; pipelines, valves, pumps and other associated equipment and the related secondary containment. The various units to be closed are shown on the attached diagram.

Upon closure, all the tanks, containers and associated equipment will be emptied and cleaned to remove all liquids and any residual solids. All material removed from the units will be processed on-site with treated wastewater discharged to the POTW, recovered hydrocarbons sent off-site to an end user or used oil processor and solids sent off-site to an appropriate disposal facility. All material will be properly characterized as described in the attachment and either processed on-site or sent off-site for disposal at an appropriate disposal facility.

All tanks, containers and associated equipment will be rinsed and cleaned using an appropriate detergent and pressure washed or otherwise cleaned as necessary. After cleaning, the units will be triple rinsed. When cleaned to acceptable standards, tanks, containers and associated equipment will be sold, scrapped or placed in other service. Acceptable standards will be determined by the facility(ies) accepting the tanks, containers and associated equipment. This will be documented by LES. All rinseate and cleaning residuals will be managed on-site or sent off-site for appropriate disposal.

JPMorgan Chase Bank, N.A.
Global Trade Services
131 South Dearborn, 5th Floor
Mail Code: IL1-0236
Chicago, IL 60603-5506

APR 6, 2017
OUR L/C NO.: CTCS-725791

AMENDMENT NO.: 2

TO:
DIRECTOR, DIV. OF WASTE MANAGEMENT
FLORIDA DEPARTMENT OF ENVIRONMENTAL
PROTECTION, BOB MARTINEZ CENTER
2600 BLAIRSTONE ROAD, MS 4548
TALLAHASSEE, FL 32399-2400

APPLICANT:
LIQUID ENVIRONMENTAL SOLUTIONS OF
FLORIDA, LLC
1640 TALLEYRAND AVENUE
JACKSONVILLE, FL 32206

IN ACCORDANCE WITH INSTRUCTIONS RECEIVED, THE ABOVE REFERENCED STANDBY
LETTER OF CREDIT HAS BEEN AMENDED AS FOLLOWS:

RECEIVER'S REFERENCE: NONREF

THE LETTER OF CREDIT IS HEREBY AMENDED IN ITS ENTIRETY AS FOLLOWS:

QUOTE

ISSUING INSTITUTION:

JPMORGAN CHASE BANK, NATIONAL ASSOCIATION
GLOBAL TRADE SERVICES / MAIL CODE: IL1-0236
131 SOUTH DEARBORN STREET, 5TH FLOOR
STANDBY LETTER OF CREDIT UNIT
CHICAGO, IL 60603-5506

BENEFICIARY:

DIRECTOR, DIVISION OF WASTE MANAGEMENT
FLORIDA DEPARTMENT OF ENVIRONMENTAL PROTECTION
BOB MARTINEZ CENTER
2600 BLAIRSTONE ROAD MS 4548
TALLAHASSEE, FLORIDA 32399-2400

RE: STATE OF FLORIDA SOLID WASTE FACILITY IRREVOCABLE LETTER OF
CREDIT TO DEMONSTRATE FINANCIAL ASSURANCE FOR CLOSING

DEAR SIR OR MADAM:

JPMorgan Chase Bank, N.A.
Global Trade Services
131 South Dearborn, 5th Floor
Mail Code: IL1-0236
Chicago, IL 60603-5506

APR 6, 2017
OUR L/C NO.: CTCs-725791

AMENDMENT NO.: 2

WE HEREBY ESTABLISH OUR IRREVOCABLE STANDBY LETTER OF CREDIT NO. CTCs-725791 IN YOUR FAVOR, AT THE REQUEST AND FOR THE ACCOUNT OF LIQUID ENVIRONMENTAL SOLUTIONS OF FLORIDA, LLC (HEREINAFTER THE "OWNER OR OPERATOR"), 1640 TALLEYRAND AVENUE, JACKSONVILLE, FL 32206 UP TO THE AGGREGATE AMOUNT OF THREE HUNDRED NINETY-ONE THOUSAND FORTY-THREE AND NO/100 UNITED STATES DOLLARS (U.S. \$391,043.00), AVAILABLE UPON PRESENTATION OF

(1) YOUR SIGHT DRAFT, BEARING REFERENCE TO THIS LETTER OF CREDIT NO. CTCs-725791, AND

(2) YOUR SIGNED STATEMENT READING AS FOLLOWS:

"I CERTIFY THAT THE AMOUNT OF THE DRAFT IS PAYABLE PURSUANT TO THE REQUIREMENTS OF RULE 62-701.630(6) OR 62-711.500(3), FLORIDA ADMINISTRATIVE CODE."

THIS LETTER OF CREDIT IS EFFECTIVE AS OF JUNE 21, 2016 AND SHALL EXPIRE ON JUNE 21, 2017, BUT SUCH EXPIRATION DATE SHALL BE AUTOMATICALLY EXTENDED FOR A PERIOD OF ONE YEAR ON JUNE 21, 2017 AND ON EACH SUCCESSIVE EXPIRATION DATE, UNLESS, AT LEAST 120 DAYS BEFORE THE CURRENT EXPIRATION DATE, WE NOTIFY BOTH YOU AND THE OWNER OR OPERATOR BY CERTIFIED MAIL THAT WE HAVE DECIDED NOT TO EXTEND THIS LETTER OF CREDIT BEYOND THE CURRENT EXPIRATION DATE. IN THE EVENT YOU ARE SO NOTIFIED, ANY UNUSED PORTION OF THE CREDIT SHALL BE AVAILABLE UPON PRESENTATION OF YOUR SIGHT DRAFT FOR 120 DAYS AFTER THE DATE OF RECEIPT BY BOTH YOU AND THE OWNER OR OPERATOR AS SHOWN ON THE SIGNED RETURN RECEIPTS.

WHENEVER THIS LETTER OF CREDIT IS DRAWN ON UNDER AND IN COMPLIANCE WITH THE TERMS OF THIS CREDIT, WE SHALL DULY HONOR SUCH DRAFT UPON PRESENTATION TO US, AND WE SHALL DEPOSIT THE AMOUNT OF THE DRAFT DIRECTLY INTO THE STANDBY TRUST FUND OF THE OWNER OR OPERATOR, IN ACCORDANCE WITH YOUR INSTRUCTIONS.

THE PERSON WHOSE SIGNATURE APPEARS BELOW HEREBY CERTIFIES THAT THEY ARE AUTHORIZED TO EXECUTE THIS LETTER OF CREDIT AND THAT THE WORDING OF THIS LETTER OF CREDIT IS IDENTICAL TO THE WORDING AS ADOPTED AND INCORPORATED BY REFERENCE IN RULE 62-701.630(6) (A), FLORIDA ADMINISTRATIVE CODE.

JPMorgan Chase Bank, N.A.
Global Trade Services
131 South Dearborn, 5th Floor
Mail Code: IL1-0236
Chicago, IL 60603-5506

APR 6, 2017
OUR L/C NO.: CTCS-725791

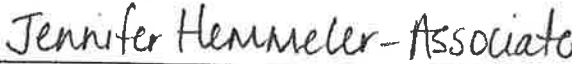
AMENDMENT NO.: 2

THIS LETTER OF CREDIT IS SUBJECT TO THE UNIFORM CUSTOMS AND PRACTICE FOR
DOCUMENTARY CREDITS (2007 REVISION), INTERNATIONAL CHAMBER OF COMMERCE -
PUBLICATION NO. 600.
UNQUOTE

ALL OTHER TERMS AND CONDITIONS OF THE CREDIT REMAIN UNCHANGED.

JPMORGAN CHASE BANK, NATIONAL ASSOCIATION


AUTHORIZED SIGNATURE


NAME AND TITLE
1-800-634-1969
STANDBYLC.CHI.MM@JPMCHASE.COM

THE ABOVE AMENDMENT IS IN ACCORDANCE WITH BENEFICIARY'S LETTER DATED MARCH
29, 2017 SIGNED BY KIMBERLY A. WALKER.

PLEASE ADDRESS ALL CORRESPONDENCE REGARDING THIS LETTER OF CREDIT TO THE
ATTENTION OF THE STANDBY LETTER OF CREDIT UNIT, 131 SOUTH DEARBORN, 5TH
FLOOR, MAIL CODE: IL1-0236, CHICAGO, IL 60603-5506, INCLUDING LETTER OF
CREDIT NUMBER CTCS-725791. FOR TELEPHONE ASSISTANCE, PLEASE CONTACT THE
STANDBY CLIENT SERVICE UNIT AT 1-800-634-1969, OR 1-813-432-1210, AND HAVE
THIS LETTER OF CREDIT NUMBER AVAILABLE.

2.2.3 In-house Laboratory Analyses

LES employs EPA Method 9077 (Dexsil, Clor-D-Tect) for all in-house TOH analyses. This technique has been proven by experience to correlate well with analytical techniques involving elaborate equipment and time-consuming methods. The method relies on the use of metallic sodium to strip organically bound halogens from the hydrocarbon molecule and convert them to free halides. The free halides are subsequently titrated using a mercuric compound to an end-point denoted by a colorimetric indicator. The amount of the mercuric compound consumed is proportional to the amount of free halide present which, in turn, is proportional to the amount of organically bound halogens originally present in the sample. The test yields virtually no false negatives but can yield false positives where there is free halide contamination of the sample (e.g. seawater). Thus, the method is suited to the screening of samples for regulatory purposes as it is unlikely to allow true hazardous waste contamination to go undetected.

2.2.4 Outside Laboratory Analyses

Occasionally, the presumption may be rebutted only through qualitative and quantitative analyses. For these procedures, LES employs an outside laboratory to perform EPA 8260. This data is then used to determine the presence or absence of halogenated compound on the Appendix VIII list. A 100-ppm threshold is used to determine the presence of a compound. In other words, a level of 100 ppm or greater is taken as evidence that the used oil is contaminated with the compound in question.

2.3 Acceptance Records

LES maintains records of each used oil shipment accepted for processing. These records consist of entries in a computer database in conjunction with filed copies of invoices, manifests, bills of lading, and other shipping documents. The following information is recorded for each load of used oil accepted:

- (1) The name, address, and phone number of the transporter who delivers the used oil;
- (2) The name and address of the generator or processor/re-refiner from which the used oil was sent;
- (3) The name and address of the destination or processor/re-refiner where the used oil was received;
- (4) The EPA identification number of the transporter who delivered the used oil;
- (5) The EPA identification number (if applicable) of the generator or processor from whom the used oil was sent;

- (6) The EPA identification number (if applicable) of the destination or processor/re-refiner where the used oil was received;
- (7) The end use code designation;
- (8) The quantity of used oil accepted;
- (9) The type of oil accepted (per 62-710.510(1)(d), F.A.C.);
- (10) The date of acceptance; and
- (11) Documentation of halogen screening (per 62-710-210(2), F.A.C.)

The above records will be maintained on-site and available for inspection for at least three years.

2.4 Used Oil Refusal Procedure

In response to screening procedures by LES Laboratory Personnel, or for other reasons, a load of used oil arriving at the LES facility may be refused (for example, when the presumption that the used oil has been mixed with a hazardous waste cannot be satisfactorily rebutted). When a load of used oil is refused, LES Laboratory personnel will immediately inform Processing personnel that the used oil is not to be off-loaded. LES Laboratory personnel will then inform the appropriate LES Account Manager, regarding the status of the load. If the appropriate Account Manager is not available, the LES Sales Manager will be contacted. Once a member of the LES Sales Department has been alerted, the representative will contact the customer as soon as possible to convey the information that the load has been refused for acceptance by LES.

3.0 USED OIL EXPORT

3.1 Off-specification Used Oil

As a marketer of used oil, LES maintains a record of each shipment of used oil originating from its facility to used oil burners. These records take the form of a computer database in conjunction with filed hard copies of invoices, manifests, bills of lading, and other shipping documents.

LES records or may cross-reference the following information on each shipment of off-specification used oil:

- (1) The name and address of the transporter who delivers the off-specification used oil to the recipient;
- (2) The name and address of the recipient of the off-specification used oil;
- (3) The EPA identification number of the transporter who delivers the off-specification used oil to the recipient;
- (4) The EPA identification number of the recipient;
- (5) The quantity of off-specification used oil shipped;
- (6) The end use of the oil (per 62-710.510(1)(f), F.A.C.); and
- (7) The date of the shipment.

2.2.3 In-house Laboratory Analyses

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- (4) The EPA identification number of the transporter who delivered the used oil;
- (5) The EPA identification number (if applicable) of the generator or processor from whom the used oil was sent;

- (6) The EPA identification number (if applicable) of the destination or processor/re-refiner where the used oil was received;
- (7) The end use code designation;
- (8) The quantity of used oil accepted;
- (9) The type of oil accepted (per 62-710.510(1)(d), F.A.C.);
- (10) The date of acceptance; and
- (11) Documentation of halogen screening (per 62-710-210(2), F.A.C.)

The above records will be maintained on-site and available for inspection for at least three years.

2.4 Used Oil Refusal Procedure

In response to screening procedures by LES Laboratory Personnel, or for other reasons, a load of used oil arriving at the LES facility may be refused (for example, when the presumption that the used oil has been mixed with a hazardous waste cannot be satisfactorily rebutted). When a load of used oil is refused, LES Laboratory personnel will immediately inform Processing personnel that the used oil is not to be off-loaded. LES Laboratory personnel will then inform the appropriate LES Account Manager, regarding the status of the load. If the appropriate Account Manager is not available, the LES Sales Manager will be contacted. Once a member of the LES Sales Department has been alerted, the representative will contact the customer as soon as possible to convey the information that the load has been refused for acceptance by LES.

3.0 USED OIL EXPORT

3.1 Off-specification Used Oil

As a marketer of used oil, LES maintains a record of each shipment of used oil originating from its facility to used oil burners. These records take the form of a computer database in conjunction with filed hard copies of invoices, manifests, bills of lading, and other shipping documents.

LES records or may cross-reference the following information on each shipment of off-specification used oil:

- (1) The name and address of the transporter who delivers the off-specification used oil to the recipient;
- (2) The name and address of the recipient of the off-specification used oil;
- (3) The EPA identification number of the transporter who delivers the off-specification used oil to the recipient;
- (4) The EPA identification number of the recipient;
- (5) The quantity of off-specification used oil shipped;
- (6) The end use of the oil (per 62-710.510(1)(f), F.A.C.); and
- (7) The date of the shipment.

- (6) The EPA identification number (if applicable) of the destination or processor/re-refiner where the used oil was received;
- (7) The end use code designation;
- (8) The quantity of used oil accepted;
- (9) The type of oil accepted (per 62-710.510(1)(d), F.A.C.);
- (10) The date of acceptance; and
- (11) Documentation of halogen screening (per 62-710-210(2), F.A.C.)

The above records will be maintained on-site and available for inspection for at least three years.

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- (7) The date of the shipment.

C. OPERATING INFORMATION

9. CLOSURE PLAN

INTRODUCTION

This plan is intended to fulfill the requirements of 40 CFR 279.54(h), Chapters 62-710.800(5), 62-701.710(6), and 62-701.710(2)(f). The plan outlines the procedures necessary for closure of the used oil management portions of the LES facility. The attachments include a schematic plant diagram, schedule of analytical methods required for closure, rinseate and residues characterization, soils sampling and analysis protocol, and groundwater sampling and analysis protocol.

LES will maintain a copy of an approved closure plan on site until the Department has accepted certification of closure. LES will submit an updated and detailed closure plan to the Department at least 60 days prior to the scheduled closing of the facility. LES will provide written notice to the Department at least 60 days prior to the date final closure is to begin. Within 30 days of completion of closure, LES will submit to the Department a certification signed by an officer of LES and by an independent registered professional engineer stating that the portion of the facility subject to used oil regulation has been closed in accordance with the specifications and procedures set forth in the closure plan.

CLOSURE PROCEDURES

The management units to be closed pursuant to this plan include the tanks and containers used to manage used oil, PCW and oily wastewater; pipelines, valves, pumps and other associated equipment and the related secondary containment. The various units to be closed are shown on the attached diagram.

Upon closure, all the tanks, containers and associated equipment will be emptied and cleaned to remove all liquids and any residual solids. All material removed from the units will be processed on-site with treated wastewater discharged to the POTW, recovered hydrocarbons sent off-site to an end user or used oil processor and solids sent off-site to an appropriate disposal facility. All material will be properly characterized as described in the attachment and either processed on-site or sent off-site for disposal at an appropriate disposal facility.

All tanks, containers and associated equipment will be rinsed and cleaned using an appropriate detergent and pressure washed or otherwise cleaned as necessary. After cleaning, the units will be triple rinsed. When cleaned to acceptable standards, tanks, containers and associated equipment will be sold, scrapped or placed in other service. Acceptable standards will be determined by the facility(ies) accepting the tanks, containers and associated equipment. This will be documented by LES. All rinseate and cleaning residuals will be managed on-site or sent off-site for appropriate disposal.

When the tanks, containers and associated equipment have been cleaned to acceptable standards, the entire secondary containment of the facility will be pressure washed using water and appropriate detergents. When the pressure washing has been completed, a final rinse will be done and the rinseate tested using the applicable analytical methods. Rinseate and cleaning residuals will be managed on-site or sent off-site for appropriate disposal.

When the management units and the secondary containment have been cleaned to acceptable standards, soils near the secondary containment will be sampled and tested as described in the attachment covering soils sampling and testing.

Should soils testing indicate the presence of contaminants at unacceptable levels, groundwater will be tested by way of monitoring wells installed for that purpose as described in the attachment covering groundwater sampling.

Any contaminated soils will be removed from the site and sent to an appropriate disposal site. When any contaminated soils have been removed, groundwater will be further tested to determine levels of contamination, if any.

Should groundwater show unacceptable levels of contamination following facility closure and removal of any contaminated soils and if contaminated soils cannot be practically removed or decontaminated at time of closure, LES will close the tank system and proceed with appropriate post closure steps pursuant to 40 CFR 265.310, in accordance with 40 CFR 279.54(h)(ii).

A Brief Summary of the Rules and Regulations Applicable to a Used Oil Transporter Training Program

Note: The following summary is provided in an attempt to simplify some of the legal language found in the Laws, Rules and Regulations pertaining to the management of used oil in Florida. This summary is incomplete and not comprehensive. Only certain parts of the applicable citations are summarized here. This is not a substitute for and does not replace the actual language found in the Laws, Rules and Regulations cited. For copies of the original documents, please contact the Used Oil Coordinator, FDEP, 2600 Blair Stone Road, MS 4560, Tallahassee, FL, 32399-2400; or phone (850) 245-8755.

Both State and federal regulations apply to the management of used oil. The federal regulations are found in Chapter 40, Part 279 of the Code of Federal Regulations (CFR) (to view go to <http://www.gpoaccess.gov/cfr/index.html>). The State laws regarding used oil are found in Chapter 403.75 through 403.769 of the Florida Statutes (F.S.) (Florida Statutes can be found at <http://www.leg.state.fl.us/Statutes/index.cfm?Tab=statutes&submenu=-1&CFID=56371064&CFTOKEN=21118445>). The specific management standards for used oil in Florida are found in Chapters 62-701 (Solid Waste Management Facilities) and 62-710 (Used Oil Management) of the Florida Administrative Code (F.A.C) (to view these rules go to http://www.dep.state.fl.us/waste/quick_topics/rules/default.htm).

A. Federal Rules (Code of Federal Regulations, C.F.R.)

- 1. 40 CFR, Part 279.40** This section (Subpart E) describes the used oil management standards which are applicable to used oil transporters (persons who transport used oil) and transfer facilities (facilities which store used oil for over 24 hours, but less than 35 days).
- 2. 40 CFR, Part 279.41** Transporters cannot process used oil.
- 3. 40 CFR, Part 279.42** Transporters must have an EPA identification number.
- 4. 40 CFR, Part 279.43** Transporters must deliver used oil to another transporter, processor or burner which has an EPA identification number. All discharges of used oil must be managed by taking immediate action to protect human health and the environment.
- 5. 40 CFR, Part 279.44** The transporter must use either product knowledge or testing to determine whether the halogen content of the used oil to be picked up is above or below 1,000 parts per million.
- 6. 40 CFR, Part 279.45** Used oil transporters are subject to all applicable Spill Prevention, Control and Countermeasures (40 CFR Part 112) in addition to the requirements of this subpart.

Used oil must be stored at a transfer facility which has notified (has an EPA identification number) and has secondary containment. Used oil cannot be stored at a transfer facility for longer than 35 days. (40 CFR, Part 279.45(a))

Containers and aboveground tanks used to store used oil at transfer facilities must be labeled clearly with the words "Used Oil" (40 CFR, Part 279.45(g))

- 7. 40 CFR, Part 279.46** Transporters must keep records of all used oil accepted and delivered for three years. The records must include the name, address, EPA identification number and signature of the person who provided or accepted the used oil, the quantity of used oil handled and the date of delivery.

B. Florida Law (Florida Statutes, FS.)

1. **§403.121** DEP may recover damages for any injury to the air, waters, or property of the State. DEP may impose a \$10,000 penalty for each offense (**each day of violation is a separate offense**).
2. **§403.141** Anyone who pollutes may be held jointly and severally liable (anyone involved in the chain of custody, from the generator through the final destination can be held liable for the pollution).
3. **§403.161** It is a violation of state law to cause pollution, fail to comply with any laws or rules, make false statements regarding these laws and rules or fail to report discharges. There are three types of violations: a) anyone who willfully pollutes is guilty of a third degree felony, punishable by \$50,000 and/or 5 years imprisonment for each offense; b) anyone who pollutes, due to reckless indifference or gross careless disregard, is guilty of a second degree misdemeanor, punishable by \$5,000 and/or 60 days in jail for each offense; and c) anyone who fails to comply with any laws or rules is guilty of a first degree misdemeanor, punishable by \$10,000 and/or 60 months in jail.
4. **§403.708 (1)** No person shall deposit any solid waste in or on the land or waters located within the State. **(12)(b)** No person shall dispose of used oil in landfills.
5. **§403.751** No person may manage used oil in any manner which endangers public health or welfare. No person may discharge used oil into any storm drain, sewer, septic tank or body of water. No person may mix used oil with solid waste that is to be disposed of in a landfill. No person may mix used oil with a hazardous substance. Used oil shall not be used for road oiling, dust control, weed abatement or other similar activities that have the potential to harm the environment.
6. **§403.754** Used oil transporters and transfer facilities must register annually, keep appropriate records and report to the Department
7. **§403.7545** Nothing shall prohibit the Department from regulating used oil as hazardous waste. (If violations occur, and the used oil portion of the mismanagement, spill, or contaminated site is considered a hazardous waste, fines are automatically \$50,000 per offense).
8. **§403.767** Anyone who transports more than 500 gallons of used oil over public highways must be certified by the Department. Certification includes demonstration of adequate training and insurance.

C. Department Rules (Florida Administrative Code, F.A.C.), found in:

62-701, F.A.C., Solid Waste Management Facilities

62-710, F.A.C., Used Oil Management

62-740, F.A.C., Petroleum Contact Water

1. **62-701.200** Training should include definitions of **(78)** oily wastes and **(122)** used oil.
2. **62-701.300 (8a)** No person shall dispose of used oil in a landfill. **(11)** No person may commingle used oil with solid waste that is to be disposed of in a landfill.
3. **62-710.401 (4)(5)** Prohibitions: No person may mix or commingle used oil with hazardous substances (exception found in 40 C.F.R.279.10(b)(3)); used oil shall not be used for pavement oiling for dust control, weed abatement, or other similar uses that have the potential to release used oil into the environment.
4. **62-710.500** Used oil transporters and transfer facilities must register with the Department.
5. **62-710.510** Used oil transporters must, on the appropriate forms, keep records (for three years) and provide an annual report to the Department. Any shipment of used oil which is refused pick-up due to

suspected mixing with hazardous waste (halogens above 1,000 parts per million) must be recorded; a copy of this record must be left with the generator.

6. **62-710.600** Used oil transporters who transport over 500 gallons per year over public highways must be Certified by the Department by showing evidence of adequate training and insurance.
7. **62-710.850** Persons involved in the management of used oil filters must comply with this section.
8. **62-710.901(2)** This Used Oil Record Keeping form, or another form with the same information, must be used and maintained on-site for three years.
9. **62-740**, Declaration of Intent
10. **62-740**, Applicability
11. **62-740**, Definitions
12. **62-740**, General
13. **62-740**, Management Practices for Producers of PCW Product Recovery
14. **62-740**, Management Practices for Transporters Shipping PCW for Product Recovery
15. **62-740**, Management Practices for Recovery Facilities