UNIVERSAL ENVIRONMENTAL SOLUTIONS

Letter of Transmittal

Date:	February 19, 2019
Bheem R. Kothur, P.E., DEE	
Hazardous Waste Program and Permitting	File: UES Process Permit Re:UES Used Oil Processing Facility
	Permit FLR000199802 Permit Update -
	Revision 4

Enclosed please find:

<u>X</u> herewith <u>under separate cover: drawings</u> descriptive literature <u>letters</u>

If all information listed is not received, please contact us immediately.

Quantity	Т	Comments
1 PDF	UES Used Oil Processing Facility	
(Upload)	Permit Update -FLR000199802 Revision 4, February 1, 2018	Y

*Comment letter code:

R-Reviewed N-Reviewed and Noted I-For your Information Y-For your approval

The attached UES Used Oil Processing Facility Permit Modification (Permit) – Revision 4 is being submitted to respond to a request for additional information letter recieved by UES on December 18, 2018. The December 18, 2018 letter detailed the FDEP review of the Used Oil Processing Facility Permit Modification Revision 3 submitted by UES on November 1, 2018.

To avoid confusion and document completeness the original November 1, 2018 transmittal letter is included with this submission as well as any additional requested documents included and referenced in that November 1, 2018 transmittal letter. The following four modifications and information requests were taken form the attached December 18, 2018 FDEP Request for Additional Infomation Letter. UES has provided a comment in red below each of items that details the resolution.

1.a. Part II, Page 7 of 8, Land Owner Certification It is the Department's understanding that the current land owner is Hendry Holdings, as indicated in the DEP Form 8700-12FL (Item #8, Page 1 of 5) and Part I.A of the Modification Application (Item #13, Page 2 of 8). The current Land Owner Certification form is not signed by the land owner. If Ed Kinley is an authorized representative, please attach a letter of authorization; if not, please resubmit this page of the application with the current land owner's signature. UES Response 1.a.- A revised and updated FDEP Form 8700-12FL has been attached to the Revision 4 submission. This document is included after page 8 of 8 of the permit applcation. The Form includes the authorization letter, special deed waranty and legal desecription of the property.

- 1.b. Application, DEP Form 62-710.901(6): Part II, Page 8 of 8, P.E. Certification, Item #2, Tank Numbers. This item indicates there are 27 total tanks, 16of which are noted as Oil Bearing. The DEP Form 8700-12FL (Item #13, Page 3 of 5) and other parts of the Modification Application also indicate that PCW Recovery and Transport are performed on site as well as stored in several tanks. Please activities provide clarification regarding omission of these tanks from the Tank N Numbers item description on the P.E. Certification form. Revision resubmittal of this form is not required. Also, please verify if there are any PC designated tanks the facility. If not review and revise the documents as appropriate. at UES Response 1.b. - The verbiage 16oilbearing was included to delineate between oil bearing tanks subjected to specific SPCC requirements. The Part II certification covers all 27 tanks to avoid confusion the verbiage was removed and a new P.E. certication page as well as a tank summary table attachment to the Part II certification has been included in this Revision 4 submission.
- 2. Attachment 8, Contingency Plan / SPCC Plan: Pages 100, 125, and 126 within this attachment are missing the P.E. Certification and management approval signature from Universal Environmental Solutions, LLC, as applicable. The Department acknowledges that these certifications signatures are provided on Page 112 of this attachment, however these forms must be completed and resubmitted. UES Response 2. Pages 100, 125 and 126 were removed and replaced with the pages containing the appropriate signatures.
- 3. Attachment 10, Closure Plan, Table 10.2-1, Waste Management Unit Information (Page 173) This table indicates that there are four (4) 21,000 Gal Frac Tanks; however, these tanks are identified elsewhere in the Modification Application as 20,000 gallons each. Please provide clarification and revision as appropriate throughout the document. UES Response 3. - A review of all references to the frac tanks sizes have been completed and all references to the frac tank sizes have been changed to 20,000 gallons.
- 4. Attachment 11, Employee Training Plan, Revision 3, and Page 192: The Training plan in this attachment seems to be specific to SPCC requirements, and does not address the Used oil Rule 62-710, training. Additional annual training is needed for employees involved in transporting used oil. Also, DEP recommend that the training plan include specifics on the tank and container management, labeling and recordkeeping. UES Response 4 Specific waste handling procedures and training materials are included in Section 4 Waste Analyses and Sampling Plan.Employees are trained utilizing Section 4 procedures during Waste Handling Training classes. An additional Standard Operating Waste Assessment Training and reference guide has been included in Section 11 of this Revision 4 submission. The document includes training of personnel on the use and operation of the TIF P-1A Halogen Detector.

Transmittal FDEP February 19, 2019 Page 3

To allow for ease of review and to note differences between Rev 3 and Rev 4, a list in red text of pages within each attachemnt section that have been modified or edited is listed below the title header on each of the 11 attachment title pages. To note the differences between Rev 3 and Rev 4 of the permit a list in blue text of pages within each attachment section that have been modified or edited is listed below the title header on each of the 11 attachment section that have been modified or edited is listed below the title header on each of the 11 attachment title pages. An updated table of contents has been provided as well. If you have any questions, comments or concerns please contact me at your earliest convenience.

Regards,

E.K.-IM

Ed Kinley, President

DISTRIBUTION: Sean McGinnis, P.E. (FDEP) Elizabeth Knauss (FDEP) Anthony Tripp (FDEP) Bryan Baker (FDEP) Keith Coats (P.E.) Jim Seavy (Consultant)

TABLE OF CONTENTS

	TABLE OF CONTENTS	тос
<u>Permit</u>	Forms & RAI Letter Documents	Revision 4
Transmi	ttal Letter - Permit Modification Submission Rev 4 Dated 02/19/19	3 of 3
Table of	Contents	1 of 1
FDEP RA	I Request Letter Re: Permit Modification Rev 3 Dated 12/18/18	1 of 1
Transmi	ttal Letter - Permit Modification Submission Rev 3 Dated 11/01/18	2 of 2
Transmi	ttal Letter Rev 3 Attachment - Rev 3 Offloading Area Design Figure P.E Stamped	1 of 1
FDEP Fo	rm 62-710-901(6) Used Oil Processing Facility Permit Application Rev 4	8 of 8
Charecte	eristic of Containers Tank Summary Table - RAI Rev 4 Clarification Table	1 of 1
FDEP Fo	rm 8700 FL-12 Florida Notification of Regulated Waste Activity- Updated for Rev 4 -RAI Rev 4	5 of 5
FDEP Fo	rm 8700 FL12 Attachments - Proof of Agent Letter, Special Warranty, Property Decrription RAI	Rev 4 5 of 5
<u>Permit</u>	Attachments	PAGE #
1.	Permit Attachment Structure & Facility Detailed Process Description	1
2.	Facility Description	13
3.	Detailed Process Flow Description	16
4.	Waste Analysis and Sampling Plan	29
5.	Sludge, Residue & Byproduct Management Plan	68
6.	Tracking Plan	69
7.	SWPPP	87
8.	Contingency Plan / SPCC Plan	94
9.	Unit Management Plan	134
10.	Closure Plan	172
11.	Employee Training Plan Page i	192

FDEP REQUEST FOR ADDITIONAL INFORMATION (RAI) LETTER DATED 12/18/18 Re: UES Used Oil Processing Facility Permit FLR000199802 Permit Update - Revision 3

Page 3 of 4 RAI Request Only

Attachment: List of Requested Information

Facility Name: Universal Environmental Solutions, LLC – Tampa Facility ID: FLR 000 199 802 Current Permit Number: 330300-001-HO DEP Application Number: 330300-002-HO

<u>Review Comments</u>: The modification application has been reviewed with respect to the applicable requirements in 62-710.800, F.A.C; comments are included below. Please submit any necessary revisions electronically for our record, unless a physical copy is otherwise noted or requested.

1. Application, DEP Form 62-710.901(6),

- a. <u>Part II, Page 7 of 8, Land Owner Certification</u>: It is the Department's understanding that the current land owner is Hendry Holdings, as indicated in the DEP Form 8700-12FL (Item #8, Page 1 of 5) and Part I.A of the Modification Application (Item #13, Page 2 of 8). The current Land Owner Certification form is not signed by the land owner. If Ed Kinley is an authorized representative, please attach a letter of authorization; if not, please resubmit this page of the application with the current land owner's signature.
- b. Part II, Page 8 of 8, P.E. Certification, Item #2, Tank Numbers: This item indicates there are 27 total tanks, 16 of which are noted as "Oil Bearing." The DEP Form 8700-12FL (Item #13, Page 3 of 5) and other parts of the Modification Application also indicate that PCW Recovery and Transport activities are performed on site as well as stored in several tanks. Please provide clarification regarding omission of these tanks from the Tank Numbers item description on the P.E. Certification form. Revision / resubmittal of this form is not required. Also, please verify if there are any PCW designated tanks at the facility? If not review and revise the documents as appropriate.
- 2. <u>Attachment 8, Contingency Plan / SPCC Plan</u>: Pages 100, 125, and 126 within this attachment are missing the P.E. Certification and management approval signature from Universal Environmental Solutions, LLC, as applicable. The Department acknowledges that these certifications / signatures are provided on Page 112 of this attachment, however these forms must be completed and resubmitted.
- 3. <u>Attachment 10, Closure Plan, Table 10.2-1, Waste Management Unit</u> <u>Information (Page 173)</u>: This table indicates that there are four (4) "21,000 Gal Frac Tanks;" however, these tanks are identified elsewhere in the Modification Application as 20,000 gallons each. Please provide clarification and revision as appropriate throughout the document.
- 4. <u>Attachment 11, Employee Training Plan, Revision 3, and Page 192</u>: The Training plan in this attachment seems to be specific to SPCC requirements, and does not address the Used oil Rule 62-710, training. Additional annual training is needed for employees involved in transporting used oil. Also, DEP recommend that the training plan include specifics on the tank and container management, labeling and recordkeeping.

UNIVERSAL ENVIRONMENTAL SOLUTIONS

Letter of Transmittal

Date:	November 01, 2018
Bheem R. Kothur, P.E., DEE	
Hazardous Waste Program and Permitting	File: UES Process Permit
	Re:UES Used Oil Processing Facility
	Permit FLR000199802 Draft Permit
	Update - Revision 3
Englosed plage find:	

Enclosed please find:

X herewith __under separate cover: __drawings __descriptive literature __letters

If all information listed is not received, please contact us immediately.

Quantity	Т	Comments
1 Hard Copy /	UES Used Oil Processing Facility	
1 PDF	Permit Update	
(Electronic Disk)	-FLR000199802 Revision 3, November 2018	Y

R-Reviewed **N**-Reviewed and Noted **I**-For your Information **Y**-For your approval The attached UES Used Oil Processing Facility Permit Modification – Draft Revision 3 is being submitted to address the additional of new and modification of several tanks and the addition of oil and wastewater clarification process that were installed at the facility as well as updates to the plan submissions contained within the permit submission. This permit revision includes an updated and signed Used Oil Processing Facility Application and a revised version of the approved permit submission attachments contained in the approved Used Oil Processing Facilty Permit Application - Revision 2 (Rev 2) submitted on March 6, 2015 and approved on April 7 2015. The draft permit is being reviewed by our P.E for final signature and approval. We would like to incorporate your comments in this draft before final P.E. signature and submission. The following items have been updated to include permit was submitted to address the UES facility located at 1650 Hemlock St Tampa Fl.

- The concrete frac tank containment pad area, frac tanks, filtration bo es and piping identified in attachment 1, page 8 as Figure 1.3.1 in the Rev 2 submission as future have been installed and have been placed in service at the facility. The frac tanks are utilized for primary segration, storage, filtration and settling of oily water streams prior to entering the bulk storage tanks contained on in the tank pad area. All of the figures, tables, facility capacity calculations and process descriptions in Attachments 1,2,3,8, ,10 and 11 have been updated in this Revision 3 submission to include these systems.
- To assist in further clarification of the recovered oils post Dissolved AIr Floatation (DAF) separation an additional thermal treatment process was installed. A diesel powered steam boiler was added at the facility and the bulk storage tank identified as Tank 3 on the tank containment pad was repurposed for batch post treatment of recovered oils. Tank 3 was insulated and fitted with steam heat e change piping.

P.O. Box 76105, Tampa, FL 33675 ~ Phone (813) 241-9206 ~ Fax (813) 241-9215

Post processed oils are heated to induce water separation. The water is returned to the bulk storage tanks for retretment and disposal to the POTW. Figures, tables and text containment within Attachments 1,2,3,8,9,10 and 11 have been modified to reflect the addition of this equipment and process.

- To meet reduced target wastewater requirements by the City of Tampa POTW and additional post wastewater clarification process was added to treat the wastewater stream post DAF processing. A batch metals precipitation and ionic excahnge system was installed in the Tank Farm Pad area. Bulk storage tank 4 was repurposed and utilized for hydroxide percipitation of metals from the post processed wastewater. The treated wastewater is then filtered and pumped through an ionic exchange system before discharge to the POTW. Figures, tables and text containment within Attachments 1,2,3,8,9,10 and 11 have been modified to reflect the addition of this equipment and process.
- UES had requested and recieved an exemption to utilize a 10,000 gallon Polyproplene tank for used oil storage. This exemption letter was included in the Rev 2 submission. The 10,000 gallon tank has been repurposed for use in storing clarified wastewater post DAF and percipitation/ionic exchange processing. UES has submitted an exemption for temporary storage of recycled oil in Tank #6 Frac Tank 4, the exemption submission is included in Attachment 9 Section 9.3.
- The Offloading Pad permit design figure is attached prior to the Table of Contents page to this permit modification submittal for your records.

To allow for ease of review and to note differences between Rev 2 and Rev 3 a list of pages within each attachemnt section that have been modified or edited is listed below the title header on each of the 11 attachment title pages. An updated table of contents has been provided as well.

This Rev 3 submission does not include the initial facility inspection deficiency documents and Revision 1 comments, responses and letters that were included and accepted in the Rev 2 submission.

If you have any questions, comments or concerns please contact me at your earliest convenience.

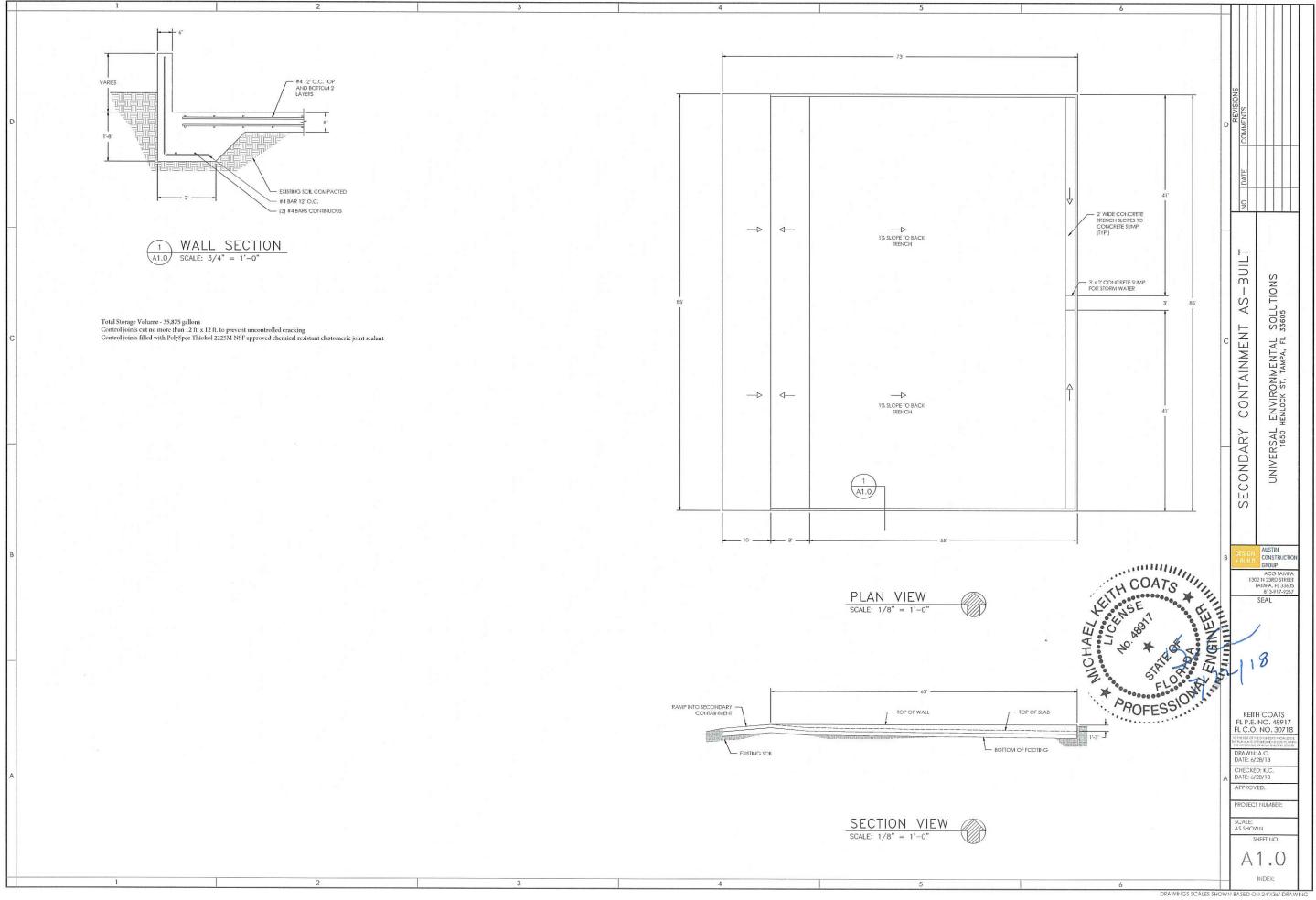
Regards,

E.K.-IM

Ed Kinley, President

DISTRIBUTION: Sean McGinnis, P.E. (FDEP) Elizabeth Knauss (FDEP) Anthony Tripp (FDEP) Bryan Baker (FDEP) Keith Coats (P.E.) Jim Seavy (Consultant)

P.O. Box 76105, Tampa, FL 33675 ~ Phone (813) 241-9206 ~ Fax (813) 241-9215



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 4___

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)
 Maulastana (Calanant II)

_____ Marketers (Subpart H) are disposing of used oil (Subpart I)

 are	dispo	osing	of	used	01l	(Sub	part	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
O. Contact person:	Telep	hone: ()	
Title:	Email		
Mailing Address:			
Street or P.O. Box	City	State	Zip Code
10. Operator's name: Mailing Address:	Te	lephone: ()_	
Street or P.O. Box	City	State	Zip Code
1. Facility owner's name:		Telephone: ()	
Mailing Address:			
Street or P.O. Box	City	State	Zip Code
2. Legal structure: Corporation (indicate stat Individual (list name and	e of incorporation) address of each owner in spac	es provided below	v)
Partnership (list name and Other, e.g., government (ces provided belo	ow)

Mailing Address:				
Street or P.O. Box	City		State	Zip Code
Name:				
Mailing Address:				
Street or P.O. Box	City	State	Zip Co	de
Name:				
Mailing Address:				
Street or P.O. Box	City	State	Zip Co	de
Name: Mailing Address:				
Street or P.O. Box	City	State	Zip Co	de
If leased, indicate: Land	owned [[]] to be purcha presently leased; the expir 1 owner's name:	ation date of the leas	e is:	
	presently leased; the expir	ation date of the leas	e is:	
[D] If leased, indicate: Land Mailing Address: Street or P.O. Box	presently leased; the expir 1 owner's name: City	ation date of the leas	e is: State	Zip Code
[[]] If leased, indicate: Land Mailing Address:	presently leased; the expir 1 owner's name: City	ation date of the leas	e is: State	Zip Code
[]] If leased, indicate: Land Mailing Address: Street or P.O. Box Name of professional engine	presently leased; the expir d owner's name: City eer City	ation date of the leas	e is: State	Zip Code
[D] If leased, indicate: Land Mailing Address: Street or P.O. Box Name of professional engine Mailing Address: Street or P.O. Box	presently leased; the expir d owner's name: City eer City	ation date of the leas	e is: State	Zip Code
[□] If leased, indicate: Land Mailing Address: Street or P.O. Box Name of professional engine Mailing Address: Street or P.O. Box Associated with: SITE INFORMATION Facility location:	presently leased; the expir 1 owner's name: City eer City	ation date of the leas	e is: State	Zip Code
[]] If leased, indicate: Land Mailing Address: Street or P.O. Box Name of professional engine Mailing Address: Street or P.O. Box Associated with: SITE INFORMATION Facility location: County: Nearest community:	presently leased; the expir 1 owner's name: City eer City	ation date of the leas	State Zip Cod	Zip Code
[]] If leased, indicate: Land Mailing Address: Street or P.O. Box Name of professional engine Mailing Address: Street or P.O. Box Associated with: SITE INFORMATION Facility location: County: Nearest community:	presently leased; the expir 1 owner's name: City eer City	ation date of the leas	State Zip Cod	Zip Code
If leased, indicate: Land Mailing Address: Street or P.O. Box Name of professional engine Mailing Address: Street or P.O. Box Street or P.O. Box Associated with: SITE INFORMATION Facility location: County:	presently leased; the expir 1 owner's name: City eer City	ation date of the leas	State Zip Cod	Zip Code

If an individual, partnership, or business is operating under an assumed name, enter the county and state

where the name is registered: County_____ State _____

3. Attach a topographic map of the facility area and a scale drawing and photographs 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

7. Attach a copy of the facility's Contingency Plan. This requirement should describe emergency management personnel and procedures and may be met using a modifying or expounding on an existing SPCC plan or should contain the items listed in the Specific Instructions. [See item seven (7), page five (5) of the instructions.]

The contingency plan is labeled as Attachment ______

8. Attach a description of the facility's unit management for tanks and containers holding used oil. This attachment must describe secondary containment specifications, inspection and monitoring schedules and corrective actions. This attachment must also provide evidence that all used oil process and storage tanks meet the requirements described in item 8b on page 6 of the specific instructions, and should be certified by a professional engineer, as applicable.

The unit management description is labeled as Attachment

9. Attach a copy of the facility's Closure plan and schedule. This plan may be generic in nature and will be modified to address site specific closure standards at the time of closure. [See item nine (9), page six (6) of the instructions.]

The closure plan is labeled as Attachment _____

10. Attach a copy of facility's employee training for used oil management. This attachment should describe the methods or materials, frequency, and documentation of the training of employees in familiarity with state and federal rules and regulations as well as personal safety and emergency response equipment and procedures. [See item ten (10), page seven (7) of the instructions.]

A description of employee training 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: UES, LLC

FLR 000199802

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*

K-I

ED KINLEY / PRESIDENT

* If authorized representative, attach letter of authorization.

APPLICATION FROM FOR A USED OIL PROCESSING PERMIT

PART II - CERTIFICATION

Form 62-710.901(6) Facility Owner Certification

	UES, LLC	FLR 000199802
Facility Name:		EPA ID#

This is to certify that I understand this application is submitted for the purpose of obtaining a permit to construct, or operate a used oil processing facility. As the facility owner, I understand fully that the facility operator and I are jointly responsible for compliance with the provisions of Chapter 403, Florida Statutes, Chapters 62-701 and 62-710, F.A.C., and all rules and regulations of the Department of Environmental Protection.

Signature of the Operator or Authorized Representative*

ED KINLEY / PRESIDENT Name and Title (Please type or print) 813 241-9206 Date: 02 19 19 Telephone: (

* If authorized representative, attach letter of authorization.

APPLICATION FROM FOR A USED OIL PROCESSING PERMIT

PART II - CERTIFICATION

Form 62-710.901(6) Land Owner Certification

Facility Name: UES, LLC EPA ID# FLR 000199802

This is to certify that I, as land owner, understand that this application is submitted for the purpose of obtaining a permit to construct, or operate a used oil processing facility on the property as described.

Signature of the Operator or Authorized Representative*

=.K.-16 ED KINLEY / PRESIDENT Name and Title (Please type or print) 813 241-9206 Date: 02/19/19 Telephone: (

* If authorized representative, attach letter of authorization.

APPLICATION FORM FOR A USED OIL PROCESSING PERMIT PART II - CERTIFICATION

Form 62-710.901(6) P. E. Certification [Complete when required by Chapter 471, F.S. and Rules 62 - 4.050, 62-761, 62-762, 62-701 and 62-710, F.A.C.]

Use this form to certify to the Department of Environmental Protection for:

1. Certification of secondary containment adequacy (capacity), structural integrity (structural strength), and underground process piping for storage tanks, process tanks, and container storage.

Please Print or Type

- 2. Certification of leak detection.
- 3. Substantial construction modifications.
- 4. Those elements of a closure plan requiring the expertise of an engineer.
- 5. Tank design for new or additional tanks.
- 6. Recertification of above items.

NO	Initial Certification	YES	Recertification	
			27 Total See attached table for list of tank	xs.
3. Facility Name: UNIVERSAL	ENVIRONMEN	NTAL SOLUTI	ONS, LLC	
4. Facility Address:	OCK STREET	T / TAMPA, FL	33605	

33605 Zip

This is to certify that the engineering features of this used oil processing facility have been designed/examined by me and found to conform to engineering principles applicable to such facilities. In my professional judgment, this facility, when properly constructed, maintained and operated, or closed, will comply with all applicable statutes of the State of Florida and rules of the Department of Environmental Protection.

Signature

MICHAEL	K.	COATS
---------	----	-------

Name (please typ	e)	
Florida Registrati	on Number:	
Mailing Address:	1302 N. 23RD STREET	ſ
Ū	Street or P. O. Box	
TAMPA		FLORIDA
City	HIIIIIIIIIIIIIIIIIIIIIIIIIIIIIIIIIIIII	State

Telephone (B17

Page 8 of 8 DEP Form 62-710.901(6), incorporated in Rule 62-710.800(3), F.A.C. Effective Date 4-23-13

917 9267

Universal Environmental Solutions, LLC. Spill Prevention, Control, and Industrial Wastewater Pretreatment Facility Countermeasure (SPCC) Plan

Tank ID#	Tank Type	Pre-Update Process Use	Post-Update Process Use	Containment Area	Name / Primary Content / Purpose	Capacity (Barrels)	Capacity (Gals)
1	Steel	New	OWS/DAF	Offloading Pad	Open topped steel box for oily water offloading gross filtration.	12	500
2	Steel	New	OWS/DAF	Offloading Pad	Open topped steel box for oily water offloading gross filtration.	12	500
3	Steel	New	OWS/DAF	Offloading Pad	Frac Tank 1 / Olly water clarification and storage prior to OWS/DAF separation.	477	20,000
4	Steel	New	OWS/DAF	Offloading Pad	Frac Tank 2 / Oily water clarification and storage prior to OWS/DAF separation.	477	20,000
5	Steel	New	OWS/DAF	Offloading Pad	Frac Tank 3 / Oily water clarification and storage prior to OWS/DAF separation.	477	20,000
6	Steel	New	RO Thermal Treatment	Offloading Pad	Frac Tank 4 / Recycled oil storage final settling & clarification prior to shipment.	477	20,000
7	Steel	OWS/DAF	OWS/DAF	Tank Farm	Oily bilge water separator tank 1 / Oily bilge water gravity separation.	1,646	69,115
8	Steel	OWS/DAF	OWS/DAF	Tank Farm	Oily bilge water separator tank 2 / Oily bilge water open topped gravity separation tank.	1 ,6 46	69,115
9	Steel	OWS/DAF	RO Thermal Treatment	Tank Farm	Post processed oil storage and thermal treatment closed topped square tank.	1,646	69,115
10	Steel	OWS/DAF	Wastewater Clarification	Tank Farm	Wastewater polishing tank 1. Post processed wastewater storage and clarification.	1,646	60,318
11	Steel	Temp Fuel Storage	Temp Fuel Storage	Tank Farm	Diesel storage tank 1 / Temporary storage of virgin diesel prior to recycling.	120	5,000
12	Steel	Temp Fuel Storage	Temp Fuel Storage	Tank Farm	Diesel storage tank 2 / Temporary storage of virgin diesel prior to recycling.	120	5,000
13	Steel	Temp Fuel Storage	Temp Fuel Storage	Tank Farm	Gasoline storage tank 1 / Temporary storage of virgin gasoline prior to recycling.	120	5,000
14	Poly	OWS/DAF	Wastewater Clarification.	Tank Farm	Final wastewater settling tank 1. / Hydroxide precipitation settling tank.	240	10,000
15	Poly	New	Wastewater Clarification	Tank Farm	Conical bottom tank 1. Ionic exchange supernate containment tank.	24	1,000
16	Poly	New	Wastewater Clarification	Tank Farm	Round tank with removable lid. Water softener mixing tank	2.5	100
17	Poly	New	Wastewater Clarification	Tank Farm	Wastewater precipitation Sodium Hydroxide storage tank.	24	1,000
18	Poly	New	Wastewater Clarification	Tank Farm	Wastewater precipitation Sulfuric Acid storage tank.	24	1,000
19	Steel	New	Oil Thermal Treatment	Containment Not Required	Conical bottom steam settling tank. Boller steam condensate.	2	80
20	Poly	OWS/DAF	OWS/DAF	inside Bidg.	DAF Sodium Hydroxide storage tank.	24	1,000
21	Poly	OWS/DAF	OWS/DAF	Inside Bidg.	DAF Flocculant storage tank.	24	1,000
22	Poly	OWS/DAF	OWS/DAF	Inside Bldg.	DAF Coagulant storage tank.	24	1,000
23	Poly	OWS/DAF	OWS/DAF	Inside Bldg.	DAF separated oil collection tank.	48	1,200
25	Steel	OWS/DAF	OWS/DAF	Inside Bidg.	DAF Sludge collection and settling tank.	24	1,000
26	Steel	OWS/DAF	OWS/DAF	Inside Bidg.	Open topped square cone bottom tank for	18	750
27	Steel	OWS/DAF	OWS/DAF	Inside Bidg.	Wastewater coarse sand filtration. Open topped square cone bottom tank for wastewater fine sand filtration.	18	750
Dahr	Polvethyle	ne tank not used	l for olly water or o	oil storage.	CAPACITY TOTALS	9,420.5	384,743

Table 1-2: Characteristics of Containers

Updated 8700-12FL Rev Permit Modification Submission 02/19/19

FLORIDA		12FL - FLO REGULATE EP Waste Manag 2600 Blair Stone (8	D WASTE ement Division-	ACTIVIT HWRS, MS45	Y 560	(f	Date Received or FDEP Official Use Only)
EPA ID: F L	R 0 0 0 1	9980	2 Please	use the instruc	ctions docume	ent to comp	lete this form
1. Reason for Submittal (all submitters must complete pages 1 and 2 and sign page 5. Pages 3 and 4, - com- plete as applicable)	Mark 'X' in the correct box: (must choose one if a notification) FL Registration(s)	 To provide su To provide the 	il waste, used oil a ibsequent notific	activities, or PCV action (to updat	W activities). e status and fac	cility identific	cation information). s—must complete pages 1,2,5)
2. Facility or	11	NIVERSAL					
Business Name	Name of Operator:						
3. Facility Operator	ED KINLEY				Date t	became Ope	erator: <u>07 /03 / 2013</u>
(List additional Opera- tors in the comments section).	Street or P.O. Box: P.O. BOX # 7	6105				Number: 241-9206	
,	City or Town: TAMPA			State: FL	Zip C 3367		Country (if not USA):
	Operator Type:	Private Fe	deral 🖬 Muni	cipal State	e County	Other_	
4. Facility Physical Location	Physical Street Adda 1650 HEMLOC City or Town:				State:	Zi	Vessel
Information (No P.O. Boxes)	TAMPA				FL.		3605
Same address as #3 above or:	County: HILLSBOROU	JGH		Country (if r	not USA):		
5. Facility North An Classification Sys Code(s) (at least 5	tem (NAICS)		<u> 2 1 1 </u> 2 9 9		в. _ D.	<u>5 6 2</u>	<u> 9 1 0 </u>
6. Facility or	Same address as	# <u>3</u> above or: Str	eet or P.O. Box:				
Business Mailing Address	City or Town:			State:	Zip/Postal Co	ode:	Country (if not USA):
7. Facility or Business	First Name:		Last Name:		Title:		
RCRA Contact Person	Phone Number: (813)241-9206		Extension:	E-Mail:			Fax:
	Street or P.O. Box:						•
Same address as # <u>3</u> above or:	City or Town:			State:	Zip Co	ode:	Country (if not USA):
8. Real Property	Name of Owner:				Date b	ecame Own	er: 01 / 27 / 15
(FL Land) Owner of the Facility's	Port Hendry Street or P.O. Box:	У			Phone Nu	New Own	er mm dd yy
Physical Location (List additional	1800 GRANT STRE	ET		La			
owners in the com- ments section.)	City or Town: TAMPA			State: FL.	Zip Co 3360		Country (if not USA):
Same address as # <u>3</u> above or:	Owner Type:	Private Grede	ral 🛛 Munici	pal State	County	Other	

DEP Form 62-730.900(1)(b), adopted by reference in rule 62-730.150(2)(a), 62-710.500(1), and 62-737.400(3)(a)2., F.A.C. Effective Date April 23,2013 Page 1 of 5

RCRA Hazardous	Waste Status No	tification or Out of	Business Notificat	ion	EPA ID No. FL	R000199802
9. RCRA Hazar	dous Waste Act	ivities at this Fac	ility: (Mark 'X'	in all that	apply):	
(A) (1)Generator o	of Hazardous Wast	3	For Items	2 through	7, mark 'X' in all	that apply.
🖬 Yes 📮 No	(Do not include Univ	versal Waste or Used Oil)) (2) Trea	ter, Storer	, or Disposer of H	azardous Waste
	only one of the follow uantity Generator	wing three categories.	(a	t your facil	ity) Note: A hazaro may be	dous waste permit required for this activity.
Generate greater p hazardou	es in any calendar m	onth 1,000 kilograms o 2,200 lbs.) of non-acuto than 1 kg (2.2 lbs)		 b. Op c. Not 	erating Commercia erating Non-Comm n-Operating: Postc mit or Order (HSW	nercial TSD losure or Corrective Action
Generate 100kg/m Ibs.) of r (2.2 Ibs) (at least c. Conditio Generate	non-acute hazardous or less of acute haza once a year) nally Exempt SQG es in any calendar mo	onth greater than) kg/mo (>220 to <2,2 waste and/or 1 kg urdous waste (CESQG): onth 100 kg/mo or less	00 N (4)	Recycler o pecify: lote: A per Exempt B a. Sm b. Sm	f Hazardous Wast Commercial mit is required for sto oiler and/or Indus all Quantity On-sit elting, Melting, and	te (at your facility) INOn-Commercial. Drage prior to recycling.
(220 lbs. (2.2 lbs) In addition, indic: d. Short-Term e. Episodic: N) of non-acute hazar or less of acute hazar ate other generator n Generator (one-tin Not more than one-ti	dous waste and 1 kg irdous waste activities that apply. ne, not on-going) me per year:SQG	(6)	Waste Ge Choose th EITHER OR the au Receives I	enerated at Other his management act a copy of your app uthorization you rea Hazardous Waste	Facilities tivity ONLY if you attach lication for such authorization ceived from FDEP. from Off-Site
_	tes Importer of hazar ste (hazardous and r	dous waste adioactive) Generator	(7)	Undergro	und Injection Con	itrol
your facility. L Hazardous	ist them in the order waste transporters l	they are presented in ist codes routinely or u	the regulations (e.g., 1 isually transported. U	D001, D00 Jse comme	3, F007, K019, P01 nts or an additional	l page if more spaces are needed.
	² D002		4	5	6	7
				12	13	14
15	16	17	18	19	20	21
 (A) Non-Handler (1) Busine (B) Facility Closed (1) Closed 	of Regulated Wast ess no longer general d (Complete this se	longer handling waste e at This Facility (Se ess, transports, treats, s ction only if <u>all</u> busine moved or moving to a s closed on	ctions 9, 10 and 12-10 tores, disposes of, or ss activities at this fac	5 should be otherwise l ility have o	blank.) handles any regulat ceased.) 00-12FL for the new	ed waste.
(C) Property	Tax Default		(D) Pet	tion for B	ankruptcy Protect	tion
12-14 — Registra		Contact Informat		nission is a	a registration or reg	istration information update):
Same as Facility Ro Contact on page 1 or	enter:	hau	Last Name:	I E M T		Title:
Contact for: HW Transporter	Phone Num Street or P.0		Extension:	E-Mail:		
Used Oil Handler Universal Waste	City or Tow	n:		State:(Co	ountry):	Zip Code:

DEP Form 62-730.900(1)(b), adopted by reference in rule 62-730.150(2)(a), 62-710.500(1), and 62-737.400(3)(a)2., F.A.C. Effective Date April 23,2013 Page 2 of 5

Universal Waste Notification and Mercury Transporter/Handler Registration EPA ID No. FLR000	199802
12. Universal Waste (UW) Activities (Mark 'X' and complete all that apply) :	
A. Federal Image: Federally Defined Large Quantity Handler (LQH) = Generate/Accumulate: 5,000 kg (11,000 of any combination of UW accumulated (at any one time)	<u>lb) or more</u>
Accumulates: 🗖 a. UW Batteries 🗖 b. Pesticides 🗖 c. Pharmaceu	ticals
d. Mercury Containing Devices 🛛 e. Mercury Contain	ning Lamps
Destination Facility for UW Note: For this activity, a facility must treat, dispose or recycle a U A permit is required for storage prior to recycling.	W.
B. Florida Universal Pharmaceutical Waste (UPW): one-time registration	
Pharmaceuticals LQH = 5,000 kg or more of Universal Pharmaceutical Waste (UPW) accumulated (at any one time)	
Pharmaceuticals Acute LQH = more than 1 kg (2.2 lb) of acutely hazardous ("P-listed") pharmaceutical waste (UPW) accumulated
Reverse Distributor of Universal Pharmaceutical Waste (UPW) (must be registered with the Florida Department of Health	th [DOH])
C. Florida Annual Mercury Handler Registration:	
For-hire transporters, transfer facilities, handlers, reclamation and recovery facilities of Mercury-Contain Devices operating in the State of Florida are required to register annually with the Department using this form [Chapter 62-737, F.A.C.]. A one-time fee of \$1,000 is required for first time registration as a Large Quanti of Mercury-Containing Lamps and Devices as detailed in 62-737.400(3)(a)3. (please contact FDEP first). If you <u>only</u> generate lamps and/or devices or manage pharmaceuticals, do not register or complete the in	section of the ty for-hire Handler
 (1) This form is being submitted as a Florida Registration of Universal Waste Transporter/Handler for-h First time registering Renewal One-time \$1,000 fee for Mercury for-hire first time LQH registering 	
For-hire Transporter of Universal Waste Mercury-Containing Lamps or Devices	
For-hire Transfer Facility of Universal Waste Mercury-Containing Lamps or Devices	Annual Registration
Mercury-Containing Devices (thermostats, etc) SQH = less than 100 kg accumulated by for-hire handler	Required
Mercury-Containing Lamps SQH = less than 2,000 kg (8,000 lamps) accumulated by for-hire handler	
 Mercury-Containing Devices LQH = 100 kg (220 lb) or more accumulated at any one time by for-hire handler Mercury-Containing Lamps LQH = 2,000 kg (4400 lbs/8,000 lamps) or more accumulated by for-hire handler 	Annual Registration + one- time \$1,000 fee+ More Requirements (contact FDEP)
(2) Mercury Recovery and/or Reclamation Facility (A <u>hazardous waste permit</u> is required for this activity) First time registering Renewal	Annual Registration Required
Briefly Describe your Universal Waste Activities:	op Bulb Crusher(s).
13. Other State Regulated Waste Activities: Petroleum Contact Water (PCW) 🖬 Recovery 🖬 Transpo	e
Note: A water facility permit may be required for this activity. An annual report is required for a recovery facility pursuant to Ru	le [62-740.300(5)]

DEP Form 62-730.900(1)(b), adopted by reference in rule 62-730.150(2)(a), 62-710.500(1), and 62-737.400(3)(a)2., F.A.C. Effective Date April 23,2013 Page 3 of 5

Hazardous Waste and Used Oil Transporter Registrati	ons	EPA ID No. FLR000199802
14. HW Transporter Activities: (Mark 'X' and complete all t	hat apply if you need	to register your HW Transporter activities)
Transporters of and Transfer Facilities for Hazardous Wass renew their registration. Evidence of casualty/liability insurance Transfer facilities must submit several additional documents as detaile changes. Registered transporters and transfer facilities may only begin Generators of hazardous waste who transport waste only within t	e pursuant to 62-730.17 ed on page 5 the first ti n operations after recei	70(2)(a) is required in addition to this registration. ime they register and when the information ving approval from the Department.
A. HW Transporter Registration Information (must be	completed annually	and when this information changes)
This facility is a registered transporter of hazard	lous waste.	
This form is: 🗖 Initial Registration 🛛 Renewal	Notification of c	changes 🛛 Cancel Registration
□ 1. For own waste only □ 2. For commercial	purposes 🛛 3. E	Both commercial and own waste
4. Transportation Mode 🗖 Air 🗖 Rail 🗖 Highwa	y 🛛 Water 🔲 Of	ther - specify
B. HW Transfer Facility Registration Information (m This facility is a Hazardous Waste Transfer Fac	cility: (at this locatio	on) Storage Volume
This form is: 🗅 Initial Registration 🛛 Renewal 🕻	Notification of ch	anges 🖵 Cancel Registration
Note: Hazardous Waste transfer facilities must comply with the	e requirements of Ru	le 62-730.171, F.A.C., and Rule 62-730.182, F.A.C.
The Transfer Facility records required under the provis Our mailing (business) address	tions of Rule 62-730.1	
Please enter the EPA ID Number of the HW Transporter who carries th	e insurance for this Tr	ansfer Facility:
Please see the top of page 5 for additional items that must be Transfer Facilities [Rule 62-730.171(3), Florida Administrativ		on to the above registration for Hazardous Waste
15. Used Oil and Oil Filter Activities: : (Mark 'X' and com	plete all that apply if	you need to register your used oil activities),
Transporters (exemptions in 40 CFR 279.40(a)(1-4), transfer facil annually register with the Department using this form. All except Flo \$100 registration fee. This form is: Initial Registration Renewal	orida used oil (UO) Pro	ocessors and collection centers must pay an annual
If applicable, a check or money order, in the amount of \$100	, payable to Florida D	epartment of Environmental Protection is enclosed.
(1) Used Oil Transporter - mark activities: (occurring in Florida)	(6) Used Oil Filter	r Management (must annually register)
a. Transporter (off-site) and noncontiguous locations	a. Transpo	orter
□ b. Transfer Facility	D b. Transfe	•
(2) Collection Center (From businesses, <u>no more than</u> 55 gal per shipment)	c. Process	sor (Annual Report Required) ser
(3) Used Oil Processor (A permit is required.)	(7) The records rec	quired under the provisions of Rule 62-710.510,
(4) D Off-Specification Used Oil Burner	FAC, are kept	at (check one):
(5) Used Oil Fuel Marketer 🔲 On-Spec 🖬 Off-Spec	U Our mailin	ng (business) address 🔲 The site (facility) address
Please see the top of page 5 for additional items that must be subm exempt Used Oil Transporters.	nitted in addition to t	he above registration and fees required for non-

Transfer Facility and Used Oil Transporter requiren	nents and required signature page	EPA ID No. FLR0001	99802
(14 cont.) Hazardous Waste Transfer Facilities: Following items are required to be submitted with the in subsequent submission [Rule 62-730.171(3), Florida Ad	itial notification for a transfer facility a		
Certification by a responsible corporate officer	• • • • • • • • • • • • • • • • • • • •		
	tes (F.S.) [Rule 62-730.171(3)(a)1., F.A		
Evidence of the transporter's financial responsi			
A brief general description of the transfer facil		, F.A.C.]	
A copy of the facility closure plan [Rule 62-73			
A copy of the contingency and emergency plan			
A map or maps of the transfer facility [Rule 62	-/30.1/1(3)(a)/., r.A.C.]		
5 cont.) Used Oil Transporters: (Exemptions in			
In addition to the requirements on Page 4 Sect			
 ALL registered UO Handlers must submi their own company. 	it an annual report except generators tra	insporting UO from noncontigu	ious operations within
• UO transporters transporting off-site over	r public highways only within their own	n company must submit proof o	of insurance.
• UO transporters transporting more than 5			
submission as a certified used oil transport	rter in section 17 (except those exempted	by Rule 62-710.600(1), F.A.C.):.	
The used oil annual report is attached	Evidence of Liability Insurance pu	rsuant to 62-710.600(2)(e)., F.A	A.C. is attached.
7. Certification: I certify under penalty of law that accordance with a system designed to assure that que submitted is, to the best of my knowledge and belie false information, including the possibility of fine a	alified personnel properly gather and e f, true, accurate, and complete. I am av	evaluate the information submit ware that there are significant po	ted. The information
I certify as a Used Oil Transporter that I am tation and have an annual and new employee trainin bility is demonstrated by the Used Oil Transporter (ng program in place covering the applic	cable used oil rules. Evidence o	
			f financial responsi-
Signature of owner, operator, or an	Print Name and	Title Use Oil	f financial responsi-
Signature of owner, operator, or an authorized representative	Print Name and	Title Oil	f financial responsi-
	Print Name and ED KINLEY (PRE	Oil	f financial responsi-
			f financial responsi- Date Signed (mm-dd-yyyy)
			f financial responsi-
			f financial responsi-
	ED KINLEY (PRE		f financial responsi- d Date Signed (mm-dd-yyyy)

DEP Form 62-730.900(1)(b), adopted by reference in rule 62-730.150(2)(a), 62-710.500(1), and 62-737.400(3)(a)2., F.A.C. Effective Date April 23,2013 Page 5 of 5

1800 Grant Street Tampa, Florida 33605 Ph: (813) 247-3153 Fax: (813) 319-3567

HENDRY HOLDINGS, LLC PORT HENDRY, LLC

January 4, 2019

Mr. Bheem Kothur F.D.E.P. 2600 Blair Stone Road Tallahassee, FL. 32399

Re: Universal Environmental Solutions (FLR 000 199 802)

Dear Mr. Kothur,

Please be advised that Port Hendry, LLC is the owner of a 30 plus acre facility at 1650 Hemlock Street, Tampa, Florida 33605 (the "**Property**"). Hendry Holdings, LLC is the parent company of Port Hendry, LLC.

Further, please be advised that Mr. Ed Kinley, President of Universal Environmental Solutions, LLC, is authorized to represent Port Hendry, LLC in all matters as they relate to the Used Oil Recovery and Pre-treatment wastewater facility on the Property. Mr. Kinley serves as Port Hendry's authorized agent for all matters related to this operation on the Property.

For your information, we have attached a deed vesting Port Hendry, LLC with title to the Property.

Respectfully Submitted,

Port Hendry, LLC By: Dennes & Manelli

Dennis E. Manelli Vice President

Hendry Holdings, LLC Sole Member of Port Hendry, LLC

Mane Bv:

Dennis E. Manelli Vice President

INSTRUMENT#: 2015077677, O BK 23114 PG 1838-1841 02/27/2015 at 04:36:54 PM, DOC TAX PD(F.S.201.02) \$0.70 DEPUTY CLERK: MTERRELL Pat Frank, Clerk of the Circuit Court Hillsborough County

Prepared by and return to: Ellen M. Macfarlane Macfarlane Ferguson & McMullen P.O. Box 1531 Tampa, FL 33602 This deed was prepared without benefit of a title search.

Folio Number: 198755-1100 Consideration: \$10.00 Doc Stamps \$0.70

35.50 .70 35

SPECIAL WARRANTY DEED

THIS INDENTURE, made this 27th day of January, 2015, between HENDRY CORPORATION, a Florida corporation ("**Grantor**"), whose mailing address is 1800 Grant Street, Tampa, Florida 33605, and PORT HENDRY, LLC, a Florida limited liability company ("**Grantee**"), whose mailing address is 1800 Grant Street, Tampa, Florida 33605.

WITNESSETH:

Grantor, for and in consideration of the sum of Ten and No/100 Dollars (\$10.00), to it in hand paid, the receipt whereof is hereby acknowledged, has granted, bargained, sold and transferred and by these presents does grant, bargain, sell and transfer unto Grantee and its heirs, successors and assigns forever, all that certain real property in the County of **Hillsborough** and State of Florida, including all appurtenances thereto (the "**Property**"), more particularly described as follows:

See Exhibit A attached hereto and incorporated herein.

TOGETHER WITH all the tenements, hereditaments and appurtenances, with every privilege, right, title, interest and estate, dower and right of dower, reversion, remainder and easement thereto belonging or in anywise appertaining: TO HAVE AND TO HOLD the same in fee simple forever.

And Grantor covenants with Grantee that the Property is free from all encumbrances except the following: (i) the lien of all taxes and assessments for the year 2014 and subsequent years, and (ii) all easements, liens, encumbrances, covenants, conditions, restrictions, reservations and limitations of record, if any, and that Grantor does hereby warrant the title to the Property, and will defend the same, against the lawful claims of all persons claiming by, through or under Grantor, but against none other.

4

2. 1. 1. 1. 1.

WITNESS the execution hereof as of the date first written above.

Signed in the presence of:

SD

(printed name of witness)

B60

HENDRY CORPORATION, a Florida corporation

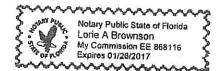
By

Aaron W. Hendry, President

(printed name of witness)

STATE OF FLORIDA COUNTY OF HILLSBOROUGH

The foregoing instrument was acknowledged before me this <u>27</u>^H day of <u>JANNEY</u>, 2015 by Aaron W. Hendry, as President of Hendry Corporation, on behalf of the corporation, who is <u>personally known to me</u> or who has produced as identification.



Notary Public Printed Name: <u>Locie A. Beau and</u> My Commission Expires: <u>EE 868116</u> Commission No. 1/26/17

Exhibit A

LEGAL DESCRIPTION OF THE PROPERTY BEING CONVEYED

A parcel of land in the Southeast 1/4, of Section 19, Township 29 South, Range 19 East, Hillsborough County, Florida. Said parcel of land also being part of Government Lot 5 and is more particularly described as follows:

Commencing at the Southeast corner of said Section 19; thence along the South line of said Section 19, North 89°26'25" West, 2003.04 feet to the Point of Beginning of the herein described parcel; thence continuing along said South section line, North 89°26'25" West, 1060.04 feet to a point on the Easterly pierhead and bulkhead line of the Sparkman Channel as shown on U.S. Army Corps. of Engineers Drawing of U.S. Harbor Lines, file #45-20641, dated June 1952; thence departing said South section line and along said Easterly pierhead and bulkhead line, North 20°49'13" East, 741.42 feet; thence departing said Easterly pierhead and bulkhead line, South 89°26'25" East, 964.30 feet; thence North 00°12'25" West, 664.18 feet to the South line of Tampa Electric Company Ingress-Egress Easement as recorded in the Official Records of Hillsborough County, Florida in Book 7718, Page 1129; thence along the South line of said Easement South 89°26'25" East, 517.22 feet; thence North 64°01'30" East, 111.92 feet to the North line of the South 1/2 of Government Lot 5; thence departing said South Easement line and along the North line of Government Lot 5, South 89°26'25" East, 45.00 feet to a point on the West railroad right of way, which is 30.00 feet West of the centerline of existing railroad tracks as located on March 17, 2004; thence departing the North line of the South 1/2 of Government Lot 5 and along said West railroad right of way, South 00°09'36" East, 954.80 feet to the beginning of a non-tangent curve, concave Southeasterly, and the Northwesterly railroad right of way, which is 10.00 feet Northwesterly of the centerline of existing railroad tracks as located on March 17, 2004; thence departing said Westerly railroad right of way and along said Northwesterly railroad right of way, 145.47 feet along the arc of said non-tangent curve, having a radius of 577.64 feet, a central angle of 14°25'46" and a chord bearing and distance of South 20°37'59" West 145.09 feet; thence departing said Northwesterly railroad right of way, North 89°03'38" West, 456.60 feet; thence North 30°31'48" West, 38.10 feet; thence North 89°26'25" West, 300.66 feet; thence South 00°33'35" West, 334.31 feet to the Point of Beginning.

TOGETHER WITH:

1. Ingress/egress easement created under Grant of Non-Exclusive Ingress-Egress Easement dated March 30, 2005, and recorded in Official Records Book 14912, Page 558, of the Public Records for Hillsborough County, Florida on April 21, 2005, as amended by Amended and Restated Grant of Non-Exclusive Ingress-Egress Easement recorded in Book 21902, Page 197. ("Easement Parcel #1").

2. Ingress/egress easement created under Fee Simple Deed With Reservations and Grant of Easement dated March 17, 1995, and recorded in Official Records Book 7718, Page 1129, of the Public Records of Hillsborough County, Florida reserving however unto the Grantor in common with the Grantee a non-exclusive right of use thereof. ("Easement Parcel #2").

3. Perpetual, non-exclusive utility easement created under Grant of Non-exclusive Utility Easement dated May 24, 2013, recorded in Official Records Book 21902, Page 208, Public records of Hillsborough County, Florida. ("Easement Parcel #3").

More particularly described as follows:

ALL MORE PARTICULARLY DESCRIBED AS FOLLOWS:

A parcel of land lying in Government 5, SECTION 19, TOWNSHIP 29 SOUTH, RANGE 19 EAST, Hillsborough County, Florida.

Commencing at the Southeast corner of said Section 19; thence North 89°26'25" West along the South boundary of said Section 19, a distance of 2003.04 feet to an Iron Rod 5/8" capped LB4636 for the Point of Beginning; thence continuing North 89°26'25" West along said South boundary of said Section 19 a distance of 1060.04 feet to a point on the Easterly pierhead and bulkhead line of Sparkman Channel as shown on U.S. Army Corps. of Engineers Drawing of U.S. Harbor Lines, File #45-20641, dated June 1952; thence North 20°49'13" East along said Easterly pierhead and bulkhead line a distance of 741.42 feet to a point in Southslip Channel; thence South 89°29'03" East near the center of said Southslip Channel a distance of 963.86 feet to a 2 inch pinched Iron Pipe; thence North 00°09'36" West, a distance of 643.66 feet calculated, 643.70 feet old descriptions and old maps, to a point 50.00 feet South of the North boundary of said Government Lot 5, Section 19, said point also being on the South boundary of Tampa Electric Company Ingress-Egress Easement as recorded in the Official Records for Hillsborough County, Florida in Book 7718, Page 1129; thence South 89°25'06" East, Deed Call in said Book 7718, Page 1129, South 89°26'25" East, Deed Call in Book 14912, Page 551 along the South boundary of said Easement, a distance of 517.22 feet; thence North 64°01'00" East, a distance of 111.80 feet to the North boundary of said Government Lot 5, Section 19; thence South 89°26'25" East Deed Call in Book 14912, Page 551, South 89°25'06" East, Deed Call in said Book 7718, Page 1129 along the North boundary of Government Lot 5 in said Section 19, a distance of 45.00 feet to a point on the West railroad right of way, which is 30.00 feet West of the centerline of existing railroad tracks as located on March 17, 2004; thence South 00°09'36" East along said West right of way a distance of 954.80 feet to a point of curve of a non-tangent curve, thence along a curve to the right, said curve being on the Westerly railroad spur right of way, which is 10.00 feet Northwesterly of the centerline of existing railroad tracks as located on March 17, 2004, an arc distance of 145.47 feet, having a radius of 577.64 feet, a central angle of 14°25'46" and a chord bearing of South 20°37'59" West and a chord distance of 145.09 feet; thence North 89°03'38" West, 456.60 feet; thence North 30°31'48" West, 38.10 feet; thence North 89°26'25" West, 300.66 feet; thence South 00°33'35" West, 334.31 feet to the Point of Beginning.

TOGETHER WITH :

1. Ingress/egress easement created under Grant of Non-Exclusive Ingress-Egress Easement dated March 30, 2005, and recorded in Official Records Book 14912, Page 558, of the Public Records for Hillsborough County, Florida on April 21, 2005, as amended by Amended and Restated Grant of Non-Exclusive Ingress-Egress Easement record in Book 21902, Page 197. ("Easement Parcel #1").

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3. Perpetual, non-exclusive utility easement created under Grant of Non-exclusive Utility Easement dated May 24, 2013, recorded in Official Records Book 21902, Page 208, Public records of Hillsborough County, Florida. ("Easement Parcel #3").

ATTACHMENT 1 – PERMIT ATTACHMENT STRUCTURE & FACILITY'S DETAILED PROCESS DESCRIPTION

1.0 UES Used Oil Processing Permit Submission Attachment Structure The following pages have been replaced in Revision 3 - PPage 7,8,9,10,11,12 and 113. TThe following pages have been modified - PPage 11. Revision 4 Updates - None

The attachments contained in this submission package are to be utilized as one document designed to meet the requirements for information about the UES facility, facility process, operators, owners, best management practices, and historical data and surrounding properties. This Revision submission includes updated text, tables and figures. The following Attachments are included in the submission:

Attachment #	Page #
ATTACHMENT 1 – PERMIT ATTACHMENT STRUC	TURE & FACILITY'S DETAILED PROCESS DESCRIPTION1
ATTACHMENT 2 – FACILITY DESCRIPTION	
ATTACHMENT 3- DETAILED PROCESS FLOW DES	CRIPTION16
ATTACHMENT 4 - WASTE ANALYSES AND SAMP	LING PLAN
ATTACHMENT 5- DETAILED PROCESS FLOW DES	CRIPTION
ATTACHMENT 6 – TRACKING PLAN	69
ATTACHMENT 7 – SWPPP	
ATTACHMENT 8 – CONTINGENCY PLAN / SPCC P	2LAN
ATTACHMENT 9 – UNIT MANAGEMENT PLAN	
ATTACHMENT 10 – CLOSURE PLAN	
ATTACHMENT 11 – EMPLOYEE TRAINING PLAN	

1.1 Detailed Facility Process Figures

The following scaled figures, and site photos depict the site location, facilities location of all past, present and future material and waste receiving, storage and processing areas. Process flow information is included in Section 1.3

1.1.0 Figure -1 - USGS Site Information and 100 Year Flood Plane Map The USGS map depicts the site location and 2000 foot radius. General Notes include UTM, site coordinates, neighborhood name, elevation data and plat map data. The Palmetto Beach neighborhood is located approximately 2,000 feet to the east of the facility and the Sparkman Channel is located approximately 800 feet to the west.

1.2 Aerial Site Photo Maps 2002, 2012, and 2014

Aerial photos taken from 2002, 2012 and 2014 depict the sites transition from a TECO power plant into a support area for shipbuilding and maintenance activities. The 2014 aerial photo shows the completed plant and details site features.

<u>1.3 Permit Reference Figures and Maps</u>

The Following site plan and map is included to detail information in Attachment 1 through 10.Waste Management Unit Designators are included on Figure 1.3.1. Emergency evacuation routes and meeting places as well as the location emergency safety and spill equipment is included on Figure 1.3.2. Incoming and outgoing material and waste traffic pattern is located in Figure 1.3.3. Containment capacity volumes and controls are located in Figure 1.3.4 and Figure 1.3.5. These figure and maps (1.3.1a, 1.3.1b, 1.3.1c, 1.3.1 and 1.3.1e) will be referenced throughout this permit submission document are provided to differentiate between figures provided within attachments that contain stand-alone document figures contained within these permit attachment.

<u>1.3.0.1 Site Location Map</u> – The Site Location Figure depicts the site area including the pretreatment system area of extents, and acreage estimates. Surveyor's contour data is included in this figure.

<u>1.3.0.2 Site Plan</u> – The site details location of buildings and structures onsite. Process Flow information is detailed in **Section 1.3** and process flow figure depicts waste management area unit designators, dimensioned containment areas, tank labels and sizes, process piping and flow direction as well as fencing, fence gate, pipeline flow direction and equipment identifiers.

Attachment 1 Revision 4 Page 3

Figure -1.1.0 - USGS Site Information and 100 Year Flood Plane Map

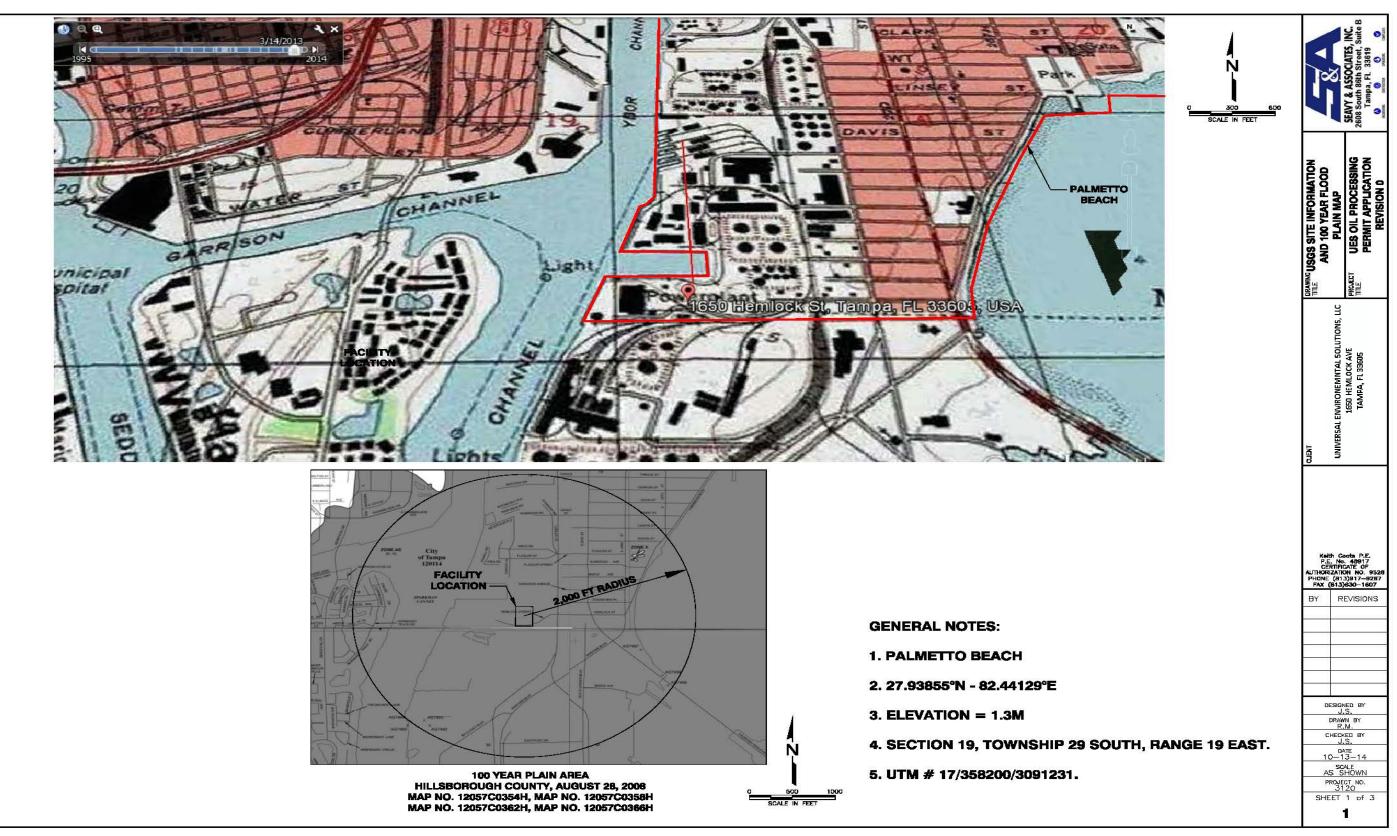


Figure 1.2 Aerial Site Photo Maps 2002



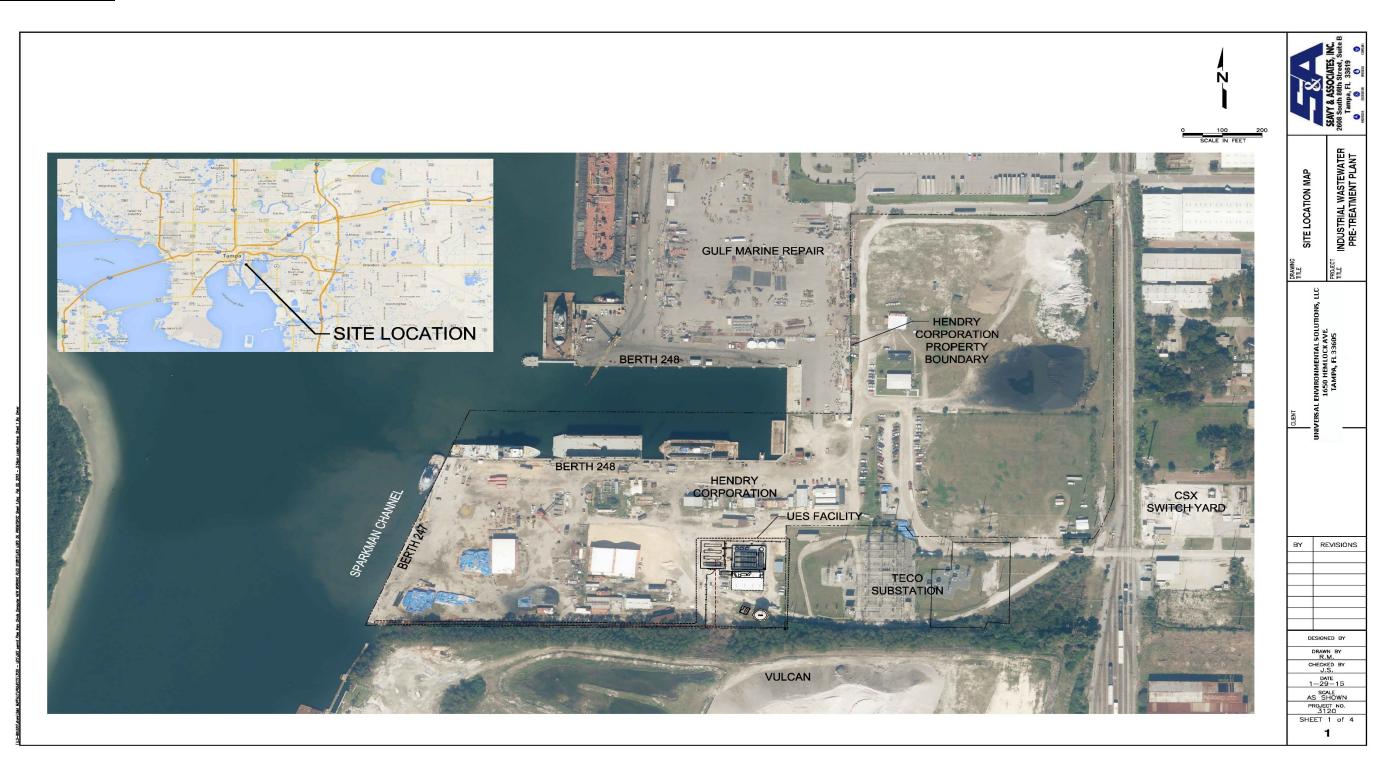
Figure 1.2 - Aerial Site Photo Maps 2012



Figure 1.2 Aerial Site Photo Maps 2014

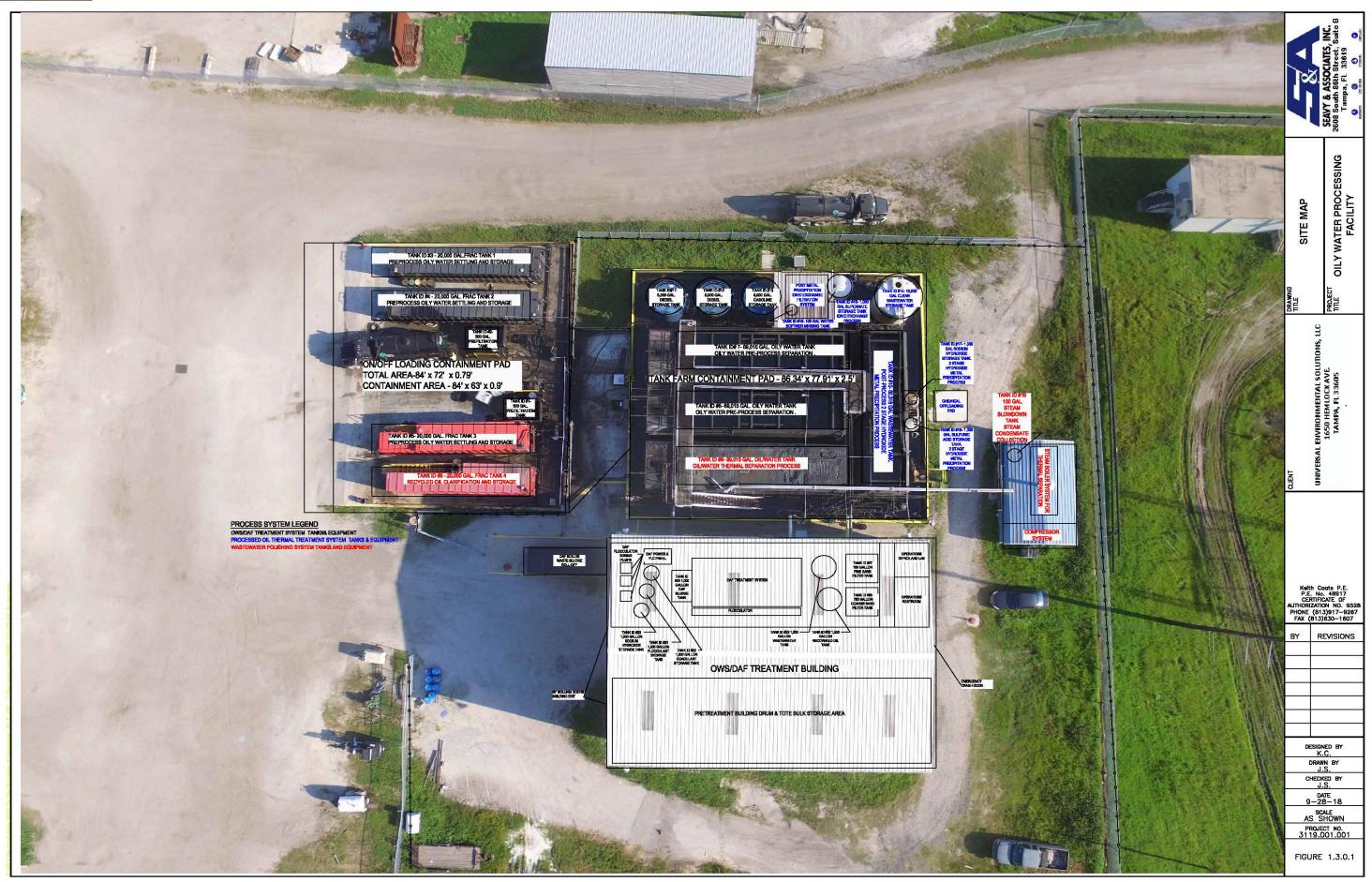


<u>1.3.0.1 Site Location Map –</u>



Attachment 1 Revision 4 Page 7

<u>1.3.0.2 Site Map –</u>



02/19/19

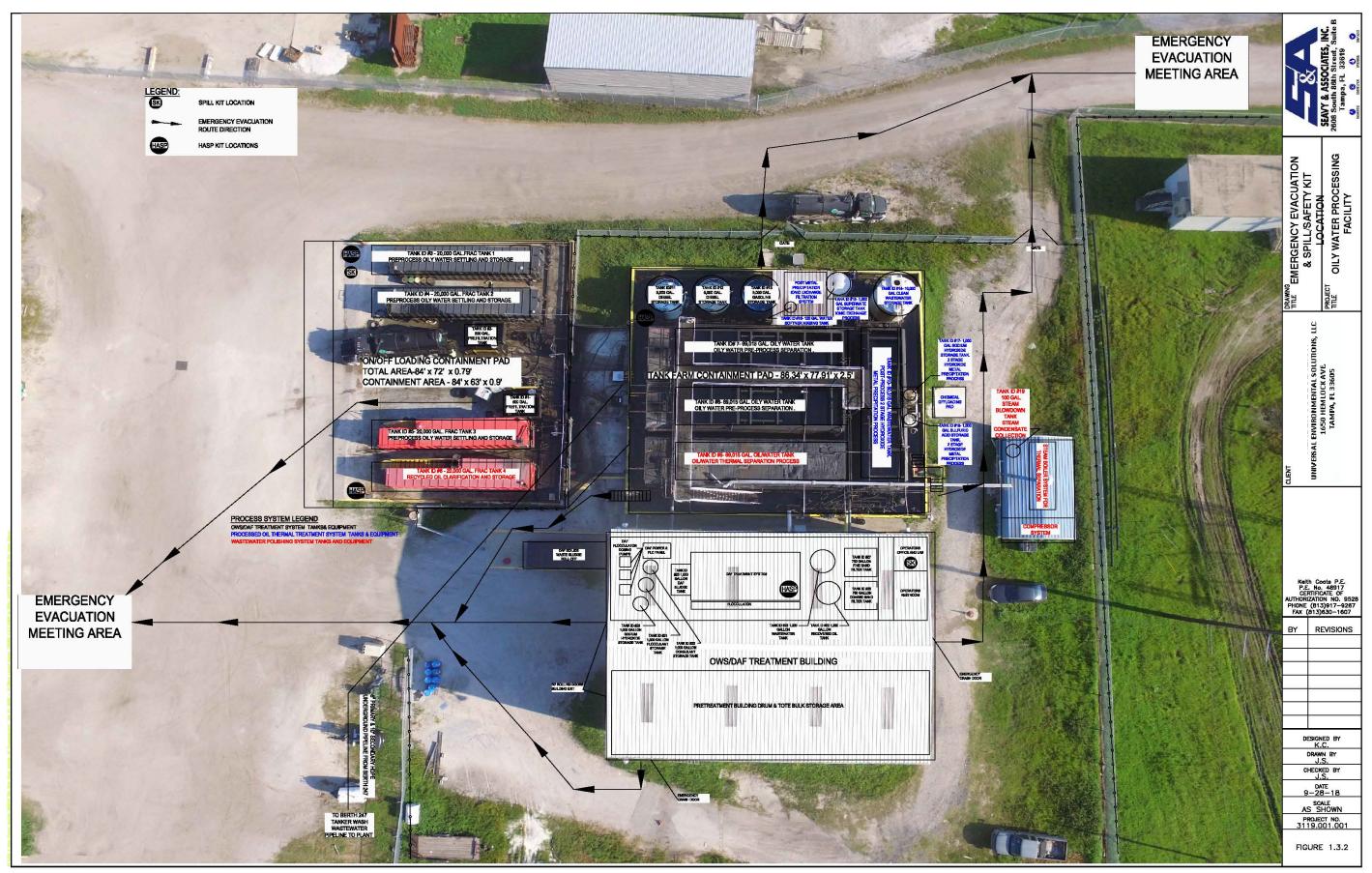
Figure 1.3.1 Permit Reference Figure – Unit Designators



DRAWNG TLE UNIT DESIGNATORS LIC DRAWG UNIT DESIGNATORS	133605 PROLECT OILY WATER PROCESSING TITLE OILY WATER PROCESSING
CUENT UNIVERSAL ENVIRONMENTAL SOLUTIONS, LLC ASSEGUENTIONS AND	TAMPA, FL 33605
Keith Ca P.E. No. CERTIFIC AUTHORIZATI FAX (813)	icta P.E. 48817 ATE OF NO. 9528 3917–95267 630–1807 EVISIONS
9-28	C. N BY S. ED BY S. TE 3-18 NE HOWN

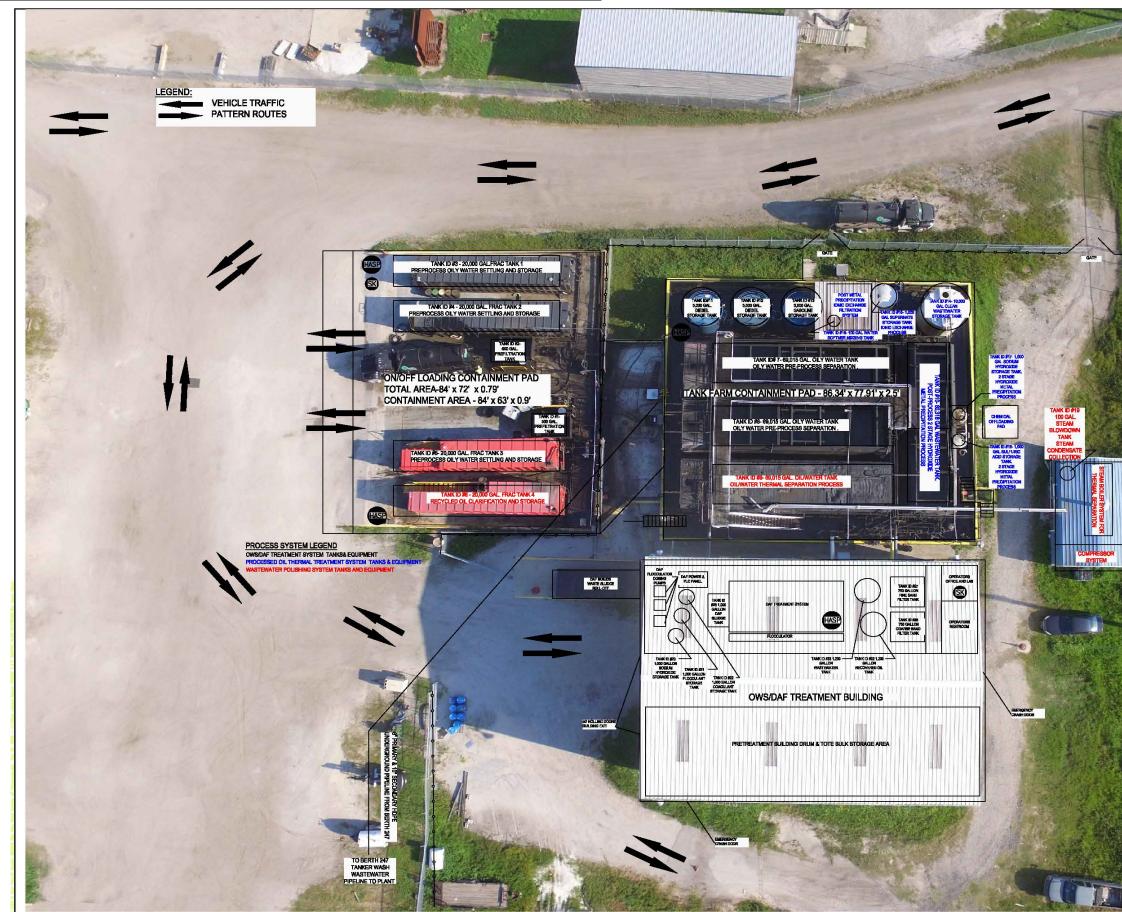
02/19/19

Figure 1.3.2 Permit Reference Figure – Emergency Evacuation Route and Emergency Spill Kit / Safety Kit Locations



02/19/19

Figure 1.3.3 Permit Reference Figure – Traffic Flow Patterns & Containment Capacity Summary



L & L	SEAVY & ASSOCIATES, INC. 2608 South Stein Street, Suite B Tampa, FL 33619 60 0 0 0 00000000000000000000000000000
DEXMINS TILE TRAFFIC FLOW PATTERNS	PROJECT TILE OILY WATER PROCESSING FACILITY
QUENT UNIVERSAL ENVIRONMENTAL SOLUTIONS, LLC	1000 TEM LUCK AVE TAM PA, FL 33605
PHONE (813) FAX (813)	ada P.E. 248917 248917 240.9528 2917-9287 630-1607 EVISIONS
K. DRAW J. CHECK J. DA 9-28 SC AS S	IN BY S. ED BY
	SP LENT LENT LENT LENT SP LENT LENT LENT LENT SP LENT LENT LENT

02/19/19

Attachment 1

Revision 2

Page 11

Figure 1.3.4 Permit Reference Figure – Tank Farm Containment Pad Capacity Calculations

Unit Designator Fuel Farm Pad		
Calculation Type Multiple Tanks and Types	63	
Date of Dike Construction	3/1/2014	
is containment protected from min?	No sumps collect and process rainwater	

	9/28/2018
ID of largest tank?	Tank ID # 7
Capacity of largest tank (gais)	69,118

	Tank Pad Capacity	Quick Conversions
Containment Dimensions Inside	Containment Part 1	1*=.08
Length (ft)	85.34	2"=.16
Width (ft)	77.91	3"=.24
Height (ft)	2.5	4"=.33
/olume (gals.)	124,333	5"=.42
Total Volume (gals.)	124,333	6*=.50

	Round Flat-Bottom Ta	nks *		Rectangle or Square			
Tank ID and Size (Gallons from Table 1-1) Exclude largest tank	Tank Diameter (ft)	Height of cylinder below wall (ft)	Cylinder displacement volume (gal)	Length (ft)	Width (ft)	Height of tank below wall (ft)	Total Tank displacement volume (gals)
TankID# 7 : 69,115		1 1		Excluded**	Excluded**	Excluded**	Excluded
TankID# 8 : 69,116				55.00	14.00	2.50	14,399
TankiD# 9 : 69,117				55.00	14.00	2.50	14,399
TankID# 10 : 60,318				48.00	14.00	2.50	12,566
TankID# 11 : 5,000	10.00	2.50	1468.65	C. 279230100		100.000	1,469
TankID# 12 : 5,000	10.00	2.50	1468.65				1,469
TankID# 13 : 5,000	10.00	2.50	1468.65				1,469
TankiD# 14 : 10,000	12.00	2.50	2114.86				2,115
TankID# 15 : 1,000	5.00	2.50	367.16				367
TankiD# 16 : 100	3.00	2.50	132.18				132
FankID# 17 : 1,000	5.00	2.50	367.16				367
Tank ID# 18 : 80	5.00	2.50	367.16				367

* Conical bottom tanks assumed flat bottom for ease of calculation.

**Largest tank excluded capacity already included in 110% calculation.

Capacity Calaculations	Gross Dike Capacity	110 % of Largest Tank (68,118 *110%)	Displacement of Remaining Tanks	Required Dike Capacity	Remaining Dike Capacity After Tank Displacement	Available Capacity	Remaining Volume OK
	124,333	76,030	49,119	123,909	76,451	424	1

8.00

Width (ft)

8.00

8.00

Excluded**

8.00

8.00

TankID# 6 : 20,000 * Conical bottom tanks assumed flat bottom for ease of calculation.

**Largest tank excluded capacity already included in 110% calculation.

*** These filtration tanks are raised 6" off of the so no reduction in capacity will included in capacity

Round Flat-Bottom Tanks *

Tank Diameter (ft)

The following results are in gallons:							
Capacity Calculations	Gross Dike Capacity	110 % of Largest Tank (20,000 *110%)	Displacement of Remaining Tanks	Required Dike Capacity	Remaining Dike Capacity After Tank Displacement	Available Capacity	Remaining Volume OK
	35,875	22,000	4,039	26,039	31,836	0,836	

ES Used Oil Processing Facility Permit Application

Containment Dimensions Inside

Tank ID and Size

(Gallons from Table 1-1)

Exclude largest bok

TankID# 1 : 500 (Raised 6")

TenkID# 3 : 20,000

TankID# 4 : 20,000

TankID# 5 : 20,000

TankID# 2 : 500 (Raised 6")***

Length (ft)*

Height (ft)**

Volume (gala.)

Total Volume (gais.)

Width (ft)

Page 12

Tank Pad Capacity (See Figure 1-3 for design size)

Containment Part 1

84

63

0.9

35,975

36,875

Rectangle or Square

Length (ft)

22.00

22.00

Excluded**

45.00

45.00

45.00

* Ped floor meets well height prior to end of ped to allow truck exiting and entry on concrete ramp without loss on containment liquids. Ped length on design figure includes concrete ramp that is not included in the capacity calculations.

** Pad floor is poured at a 2% grade not flat. The well height will be averaged over the entire width to calculate the reduction of capacity for this sloping. The most conservative calculations are utilized for capacity calculation.

Cylinder

displacement

volume (gal)

Figure 1.3.5 Permit Reference Figure – Frac Tank Containment Pad Capacity Calculations

Unit Designator Officeding Pad Calculation Type Multiple Tanks and Types Date of Dike Construction 12/1/2016 is containment protected from rain? No sumps collect and oceas rainwatar in vetern.

Height of cylinder

below

wall (ft)

Dete 5/26/2018 ID of largest tank? Tank ID # 3 Capacity of largest tank (gals) 20,000

Height of tank below

wall (ft)

0.50

0.50

Excluded**

0.50

0.50

0.50

Quick Conversions

1"=.08

2"=.16

3-24

4"- 22

5°=.42

6"=.50

Total Tank

displacement volume

(gals)

0***

0***

Excluded

1.346

1,346

1,346

02/19/19

Attachment 1

Revision 4

Revision Attachment 3 Modifications - Pages 13,14 and 15 have been modified. No Changes in Revision 4.

2.0 Facility Description

Universal Environmental Solutions, LLC (UES) has completed construction of its wastewater pre-treatment facility. UES is located in the Port of Tampa and its primary operation will be servicing the local shipyards. The project has been completed as pre-approved for construction under Service Request 07-033-12A. As detailed in the service request submittal, the treatment plant is designed to pre-treat various wastewater streams created from area shipyards. Other waste streams include, but are not limited to: cleaning and maintenance processes, environmental sampling and disposal activities, industrial process water separation systems, and contaminated storm **wasteewatter** will be non-hazardous prior to treatment. **Attachment 6** describes the processes utilized by the plant operator to prevent entry of hazardous wastes into the plant. The operation has one Plant Operator, and one Plant Technician. Operations are Monday – Friday (0730 – 1600 hours). Additional polishing processing have been added at the facility a permit Revision 3 was submitted on October 25, 2018 to identify these plant modificationsand a final Revision 4 was submitted on February 19, 2019.

2.1 Accepted Waste Streams

Below is a list of anticipated waste streams that the pre-treatment facility system has been designed to recycle:

<u>2.1.1 - Bilge Oily Water</u> – created by leaks of salt water, cooling water, fuel oil and lube oil, by the dewatering of sedimentation and sludge tanks, by the draining off of various cleaning processes and by particles of soot and dirt. BOW is typically a complex mixture of bilge water and chemicals used in ship maintenance and repair.

2.1.2 - Fuels, oils and grease residues - resulting from cleaning / purging of the cargo pipelines and tanks of vessels transporting petroleum products. Residuals include diesel fuel, gasoline, # 6 oil, crude oil, and shale oil.

<u>2.1.3</u> - Fertilizer residues - resulting from the cargo tank cleaning of vessels that transport bulk fertilizers. This service is required when a vessel is changing cargoes to another commodity (i.e. Fertilizer to Animal Feed).

<u>2.1.4</u> - Alumina residues - resulting from the cargo tank cleaning of vessels that transport bulk Alumina. This service is required when a vessel is changing cargoes to another commodity.

<u>2.1.5</u> - Landfill leachate – wastewater/storm water from landfills requiring off site treatment. **NOTE**: This wastewater will be strictly limited to prior analyses (waste profile acceptance, bench test sample treatment results) as specified in wastewater discharge guidelines.

<u>2.1.6 - Brine</u> – process wastewater used for cooling in industrial applications.

<u>2.1.7</u> - **BOD** / **COD** – commercially generated wastewaters with high concentrations of organic matter.

2.2 Waste Management Unit Designations

The pre-treatment facility consists of eight separate unit management designators. The designators were developed to describe distinct pre-treatment process locations. The designators will be used in the attachments contained within this permit submission. The unit designators are shown on Figure **1.3.1** and highlighted in green. A description of each unit designators is listed below:

2.2.1 Tank Containment Pad Area – The containment pad area consists of an 85.34'x77.91'x2.5' concrete containment area located to the north of the pre-treatment building. This area contains the pre-treatment process tanks and piping as well as pumps, filters, valves, used oil storage tanks and used fuel storage tanks. The area is open to rainfall which is collected and pumped back into the process system via a sump located in the south east corner.

2.2.2 Pre-Treatment Building Containment Area – The pre-treatment building is located to the south of the containment pad. The containment area consists of an 80'x40'x1' containment wall. The area houses the pre-treatment equipment consisting of sludge settling tank, used oil tank, process settling tank, flocculent and process piping and meters, dosing pumps, sodium hydroxide, polymer and flocculent tanks, Dissolved Air Floatation system (DAF), air pumps, electric pumps, control system. The area is 100% under cover of the building roof and receives no rainfall.

2.2.3 Bulk Storage Area – The Bulk Storage Area is located to the south of the pre-treatment building containment area and consists of a concrete pad. Bulk non-hazardous wastes are store inside of the building in drums or totes. The drums and totes are characterized and sent off for disposal or recycling.

<u>2.2.4 Lab Area</u> – The lab area is located in the northeast area of the pre-treatment building. The lab room is a 10'x10' lab room that houses laboratory testing equipment, regents, documents, records and manifest. The facility operator's office equipment including a computer and printer is located in this area.

2.2.5 Roll Off Area – The roll off area is located to the west of the pre-treatment building in the north corner. The roll off area consists of a roll off pad and containment wall, sump for removal of rainwater and a dedicated 10 yard roll off that is used to collect and dispose of the sludge's and sediments from processing of oily waters. The rainwater is pumped to the sump located in the tank containment pad area and into the process tanks for treatment.

2.2.6 Truck Unloading Areas – The Truck Unloading Areas are located to the north and west of the Tank Containment Pad area. The unloading area to the west of the containment pad is utilized to unload bulk tanker trucks through a pump located on the east side of the containment pad. The unloading area located to north of the containment area is utilized to load and unload none oil impacted leachate water. Both Unloading areas will no longer be in use upon completion of the frac Tank Storage Area in March 2015.

<u>2.2.7 Frac Tank Storage Area</u> – The Frac Tank Storage Area design was completed and installed on July 13, 2017. The frac tank storage area is located on the northwest side of the tank containment pad area.

The frac tank containment area consists of a sloped 84'x63'x0.79' pad and stores up to four 20,000 frac tanks. The frac tanks are utilized for additional preprocessing storage of used oils and process oily water that requires additional treatment or filtration prior to entering the preprocessing facility. Two offloading filter screen open topped tanks are installed and connected to two electric pumps. Rainfall and water collected in the frac tank storage area is collected in a sump located in the south east corner of the pad. The sump contains a pump that transfers the water to the tank containment pad sump and into the treatment system tanks **for processing**. Area – The Pipeline Area is located to the west of the containment pad, it consist of an

2.2.8 Pipeline Area – The Pipeline Area is located to the west of the containment pad, it consist of an 6" primary, 10" by 800' doubled walled HDPE pipeline from Berth 247 to the truck unloading area piping and into the plant for processing. The pipeline runs from berth 247 underground in the old abandoned 15" stormwater pipe for added protection and additional spill containment protection.

2.3 Facility Non-hazardous Waste Disposal Processes

The pre-treatment of oily waters results in several waste streams that require disposal. The following list details non-hazardous waste streams that require disposal.

2.3.1 Sludge Waste – Sludge's and sediments are created from the processing of oily water and oily water waste streams are collected in the bottom of the primary holding tanks, of the DAF system. Other sources of sludge wastes are created from cleaning and maintenance processes. These wastes are pumped to the roll off, then characterized, manifested and disposed offsite.

<u>2.3.2-Used/Recycled Oils</u> – Used oils are separated from the DAF process and collected in the used oil tank located on the tank containment pad area. The oils are sent offsite to be recycled.

2.3.2- Maintenance Solid Wastes – Materials and rags used for cleanup of spilled materials are collected in drums and sent off for disposal at the local incinerator. It is estimated that operations will produce one drum of maintenance solid waste per quarter.

ATTACHMENT 3- DETAILED PROCESS FLOW DESCRIPTION

Revision 3 Modifications - All the pages within this attachment have been modified and section 3.4 has been replaced. Four additional pages have been added to this section and Section 3 - Attachment B has been added. Rev 4 No Changes

3.0 DETAILED DESCRIPTION

The following detailed description should be used in conjunction with details provided in the attached Section 3.4 - Attachment A – Process Flow Diagram the Process Flow Plan provided. The attached site plan depicts location and transmission points for the various process descriptions described in the sections below.

3.1 Pre-Treatment System Components Description

Plant components were selected based on a progressive pre-treatment design. The components were sized and selected based on previous data available from operations conducted at the shipyard. The specific plant equipment processes will be discussed in Section 3.0 and the operation of these processes will be detailed in Section 4.0. An equipment and process diagram is attached as Section 3.4 to clarify process flow and equipment location and layout. Two areas house the pre-treatment process equipment, process storage, solid waste storage and primary piping and pumps are located outside on the concrete containment pad and dosing, DAF and filtration systems, secondary piping and the lab are located in the pre-treatment system warehouse. The following equipment is installed to complete wastewater pre-treatment processes:

3.1.1 Offloading & Piping – Offloading of trucks will be conducted on the west side of the plant in the frac tank storage area. Trucks with wastewater will offload using a 3" cam-locked and valved flexible hose to 3" plant piping connection inside of a double walled containment box. The containment box has two connections, one for trucks with pumps and one for trucks that require a pump to offload. The plant operator will make the proper connection and direct the wastewater to appropriate primary storage tank. Tank selection will be based on several factors: type of wastewater, required treatment, similarity to existing tank contents, batch and cleaning schedule and settling time required.

3.1.2 Storage Tanks & Roll-Off – The tank farm consists of 4 steel tanks, three of the tanks have an estimated 69,115gallon capacity each and one has a 60,318-gallon capacity. These three tanks are configured with one oily/ water separator each and a primary large to medium grit and sediment settling chamber each. Each tank has an oily water separator capacity of 30,115 and a primary settling chamber or grit removal chamber has a capacity of 39,000 each (69,115 Gallons total). Two of these tanks are utilized for oily water storage and one is used for post-processed recovered oil storage and thermal treatment to clarify the recycled oil. The fourth tank is divided in half and utilized for post-treated wastewater clarification using Hydroxide precipitation. There

10,000 gallon reclaimed oily and process waste oil collection tank has been repurposed for clarified precipitated wastewater. Several smaller polypropylene tanks are located on the pad. A 20 yd roll-off is installed on a concrete containment pad located in front of the DAF process building for waste sludge collection. All tanks were installed within a re-enforced concrete containment system that contains a sump for collection and treatment of rainwater.

3.1.3 Pumps Systems – The pre-treatment plant utilizes 2 types of pumps to move process water from offloading to storage to treatment and discharge. One 3" Gould 450 gpm self-priming pump is installed on the frac tank pad as well as a 3" Wilden air pumps and are utilized to offload trucks and transfer wastewater from the frac tank pad storage tanks to the large storage tanks on the tank farm storage pad. One Wilden 3" self-priming air pump is installed on tank farm pad to transfer oily water to the DAF for treatment. Two Wilden 3" self-priming air pump is installed on discharge piping to transfer wastewater offsite to the POTW. Four pneumatic positive displacement pumps are installed for waste processing storage and disposal. One 2" Wilden pump is installed in secondary containment at the influent of the plant for additional truck offloading. Two - 2" Wilden pumps are installed, one at the DAF process emulsified oils settling tank to transfer recovered emulsified oil to the recovered oil tank on the tank farm pad outside and one to supply the post treatment waster to the precipitation tank on the tank farm pad. One 3" Wilden pump is installed in the DAF process tank to pump sludge out the roll-off and settled process water back to the storage tanks. The DAF contains an air blending and mixing pump that is controlled by the DAF control panel.

3.1.4 Chemical Dosing & Flocculation – The plant's initial contact treatment consists of a chemical feed and dosing systems. Chemicals are injected into a pre-DAF Flocculator with two inline mixers and several sampling ports. Three LMI pump dosing pumps feed by storage tanks are installed and piped to inject and mix with the wastewater in the Flocculator. The three chemicals types selected for solids removal and DAF preparation of the wastewater are: **base**, **flocculent**, **and coagulant**. The precipitation system utilized 2-1/4" Wilden air pump to dose **base and acid** to each side of the precipitation tank on the tank farm pad.

3.1.5 Dissolved Air Floatation – The DAF installed for treatment is a PTEC 175. This DAF design utilizes state of the air blending pumps to create treatment surface area. The DAF is designed to process 100 gpm normally and 175 gpm/max.

<u>3.1.6 Post Treatment Settlement Tanks</u> – Two 1,000-gallon polypropylene tanks are installed for post DAF settling. One 1,300-gallon steel open topped rectangle low profile tank is installed on the DAF sludge discharge to facilitate sludge dewatering.

3.1.7 Post and Pre-treatment Sand Filtration Systems – Two 500-gallon sand filtration systems are installed in the process train to allow for solids separation. Wastewaters that contain high amounts of suspended solids / sediments will be processed through these units if necessary. One unit contains coarse sand and one a fine sand pre or post treatment if necessary. Normal plant operations do not utilize sand filtration. The sand filters have a backwash system that allows sludge removal to the sludge settling tank.

3.1.8 PLC Main Control Panel, DAF Sub-Control Panel, Tank Leveling Meters, pH and Flow

Meters- Plant operations will always be controlled by an operator onsite. The process operations are controlled by an Allen-Bradley PLC system that runs all aspect of plant operations. The primary and secondary storage tanks are equipped with tank level sensors that indicate tank levels and volumetric quantification of wastewater stored onsite. Two Endress-Hauser flow meters record both flow into the process system and flow discharge to the POTW. An inline pH probe is installed with a logic loop program to control the chemical dosing system. The DAF operations are controlled by a sub panel with and Eaton PLC that communicates with the Main Control panel PLC. The PLC system is programmed to allow the operator to start and stop the system based on conditions.

3.1.9 Bench Testing Laboratory – UES has installed a Quality Control (QC) testing lab in the plant area for bench testing of influent, process and discharge wastewaters. The lab is equipped with colorimetric meters, titration equipment, oven, burners and glassware to perform qualitative real-time analyses of influent and discharges as well as waste products to assure proper plant operations and to provide confirmation of off-site analytical lab results.

<u>3.1.10 –Containment Systems</u> – The storage tanks are installed on an 86' x 78' containment pad with 42" containment walls. All process equipment is contained inside an adjacent warehouse building. Equipment for transport and treatment of wastewater is housed within containment structures to prevent accidental spillage of wastewater from reaching the environment. Outside containment capacity is approximately 160,000 gallons. The containment system inside the warehouse building is designed to contain 16,400 gallons. An anti-siphon valve is installed inline prior to wastewater entry from the containment pad storage area into the warehouse containment area to prevent errant flow from the storage tanks into the process area.

3.1.11 Water and Air Supply – A 175 cfm 145 psi regulated air compressor was installed to operate the DAF system and supply the pneumatic pumps located throughout the plant. The system has a 300-gallon storage tank and an air dryer to protect critical DAF operation components. Water for cleaning and plant wash down operations is available throughout the plant.

3.1.12 Post Pre-treatment Wastewater Systems – Since initial operations the local POTW has reduced the requirements for wastewater disposal. To meet the new criteria UES has installed 2 processes to allow for continued wastewater disposal to the POTW. The first system utilizes hydroxide precipitation to remove dissolved metals from the wastewater. This system was installed on the tank farm pad and repurposed tank 10 from primary storage of oily water to a two-stage acid/base dosing system. Two 1,000-gallon sulfuric acid and sodium hydroxide tanks as well as two air operated Wilden pumps were added to the tank farm pad for dosing of DAF treated wastewater. The settled metals are removed periodically as needed from the tanks and disposed in the sludge roll-off located at the front of the plant. Further treatment of the precipitated wastewater was required to clarify and remove remaining target metals. The lonic exchange system was installed on the tank farm pad. The ionic exchange and treatment of post precipitated wastewater. The dual stage ionic exchange system was designed and constructed by

Dynalene. The system utilizes a MO-25XT Ion exchange resin with a maximum flow of 30 gpm and repurposed the 10,000-gallon polypropylene tank for final post ionic exchange wastewater settling and clarification. In addition, two tanks were added to the tank farm pad, one for supernate backwash (tank 15) of the ionic exchange cylinders, one for salt storage to soften the wastewater exchange system (tank 16). Sludges and sediments accumulated in the 10,000 final clarification tank (tank 14) and backwash supernate tank 15 are periodically removed as needed and disposed in the sludge roll-off located in the front of the plant. A copy of the system design has been included as Figure 3.5 – Attachment B.

3.1.13 Post Pre-treatment Recovered Oil Separation System – Recovered oils from the DAF process required additional treatment to meet minimum recycled oils standards. A Cleaver Brooks 50 hp steam boiler system was installed under an existing covered concrete pad located at the back of the plant. Steam supply and return piping was installed to carry the steam to tank 9. Tank 9 was repurposed from primary storage and separation of pretreated oily water to post DAF thermal treatment of DAF recovered oil. Tank 9 was fitted with a heat exchange header system and thermally coated with insulation to prevent heat loss to the atmosphere.

3.2 PRETREATMENT SYSTEM PROCESS DESCRIPTION

Design of the plant was based off batch type operations and that allow for a graduated treatment of the wastewaters processed through the plant. Four treatment types are utilized in normal plant operations: Oily/water separation, Solids Settling, Chemical Dosing and DAF. Additional sand filtration and post processing clarification of wastewater and recovered oil can be utilized in the event of wastewater influents that contain high sediments, solids and turbidity. A schematic flow diagram is attached as Section 3.4 - Attachment A.

3.2.1 Pre-& Post Sand Filtration - Wastewaters with high turbidity above discharge limits will be pumped through a coarse or fine sand filter prior to treatment. The sand filters systems can be operated in parallel, series or independent of the other. Backwash with process or potable water is required once sand system has been blinded.

3.2.2 Non-emulsified Oily Water and Grease Separation Process - The primary and secondary oily water treatment process is designed to remove non-emulsified oils and greases with primary solids treatment. This process traps floating and non-emulsified oils and grease in a two-stage oil water separation system. The non-emulsified oils and grease will separate from the wastewater as it enters the head of the system. The waste oils and grease contained in the primary and secondary oily water separators are pumped off by the operator and stored in the 10K recovery oil tank located in the tank farm. Large sediments and debris are captured in the primary and secondary oily water chambers; this material is removed and placed in the onsite roll-off periodically as needed. The separators utilize hydraulic pressure created by wastewater entering the oily water separators at the top of the tank at 11' above tank bottom grade and hydraulically displace wastewater located at bottom of the first chamber through an opening at 2' above tank bottom grade. Wastewater is then hydraulically displaced from the second chamber through a

12" pipe located 2' above the bottom grade of the tank, the pipe discharges into the top of the tanks settling chamber.

3.2.3 Secondary Solids Settling Process – A secondary settling treatment tank is piped in series so each of the three oily/water separator discharges flow through it prior to entry into DAF treatment. The secondary settlement tank has a 48,600-gallon storage capacity and is divided in half to create 2 settling chambers. Medium to small size grit sand and sediments are removed by gravity as the wastewater flows through the tank.

<u>3.2.4 Chemical Dosing -</u> Chemical dosing treatment is designed to separate emulsified oils and grease from water. A chemical feed pump supplies Sodium Hydroxide to increase the pH of water. Emulsified oil products tend to separate from water at elevated pH levels. The high pH wastewater is treated with a flocculent and coagulant in preparation of entry in the DAF treatment tanks. The flocculent mixes with the sediments, oil and grease and fine particles and the coagulant combines them for ease of removal in the DAF treatment tanks.

3.2.5 Dissolved Air Floatation (DAF) Treatment Process - The Dissolved Air Floatation (DAF) PTEC 175 utilizes compressed air and wastewater to increase the specific gravity of the wastewater allowing the flocculent and coagulant to remove oils and particulates from the water. The waste flocculent is then removed by a skimmer and stored in the 1,000-gallon oil recovery tank. Solids and sludge settled out during the DAF process are removed from the DAF system using a time pneumatic valve that is programmed to open and close as directed by the DAF control panel.

<u>3.2.5 Post Wastewater Clarification & Treatment</u> - In the event the separated wastewater does not meet criteria for disposal to the POTW. UES installed a two-stage clarification process to meet POTW standards. Stage one utilizes Hydroxide Precipitation ad stage 2 is a prefiltered ion exchange system.

<u>3.2.6 Recovered Oil Thermal Separation -</u> Recovered oils from the n the event the separated wastewater does not meet criteria for disposal to the POTW UES installed a two-stage clarification process to meet POTW standards. Stage one utilizes Hydroxide Precipitation ad stage 2 is a filtered ion exchange system.

3.3 POSTTREATMENT PLANT OPERATION DESCRIPTION

The plant consists of offloading systems, primary temporary settling storage and OWS primary treatment, storage and settling treatment, chemical dosing treatment, Dissolved Air Floatation treatment, coarse and fine sand filtration and wastewater polishing if required, post treatment settling, recovered oil thermal separation, discharge of clean process water, storage and disposal of solids and collection, storage and recycling of waste oil byproducts. The following procedures detail wastewater entry to water discharge:

3.3.1 Wastewater Management & Influent – Wastewater produced by onsite and offsite cleaning operations will be properly manifested and documented (UES operations as "Generator Knowledge" / waste profile / or laboratory characterization) prior to entry into the plant. Details

of the processes used to create the wastewater will be documented. Some wastewater may require sample submittal for bench test characterization and treatment determination. All waste profiles and manifest copies will be retained for three years on site and retained in off - site storage for an additional two years. All wastewater deliveries will be sampled in advance of discharge for waste profile conformity. The majority of wastewater entering the plant will be offloaded from tanker or vacuum trucks. Some trucks are equipped with offloading pumps and some are not and will require offloading by pneumatic pump. Wastewater enters the system through Influent piping on Tank #1, Tank #2 Tank #3 or Tank #4. Batch processes are most likely to be run when system capacity of approximately 270K gallons has been stored.

3.3.2 Primary Oily Water and Settling Treatment - Wastewater is pumped through the primary, secondary oil/ water separators then through the primary and secondary settlement and into the Flocculator and DAF by the operator. The valves must be set in the proper position. The PLC records the four tank level sensors, influent and effluent flow meters and the dosing pumps to assure that movement of the wastewater is identical to the selections make by the operator prior to startup. Discharge flow rates and influent flow rates as well as tank level calculations are determined by the PLC. The PLC is calculated to assure proper movement of flow from entry into the system to discharge. Prior to plant startup the operator will take a representative sample of the influent wastewater and run scan analyses. Bench testing will be conducted in accordance with lab testing SOP's provided by manufacturer of equipment. Calibration and testing records will be kept onsite for review.

3.3.3 Chemical Dosing and Flocculation – Sodium hydroxide will be used to increase the pH on the wastewater post pre-treatment. If required, the operator can provide the PLC startup with a pH set point. The loop ladder logic will control the pH dosing pump to increase dosing until the desired set point pH level is reached. The loop feedback from the inline pH probe will continue to control caustic dosing. Caustic levels will vary based on reduction and efficiency of the DAF process. "Chem-Treat" will be used as an anionic polymer to provide flocculation of the wastewater stream prior to entry into the DAF unit. Polymer dosing will be calculated based on preliminary bench testing prior to the startup of each batch. Coagulant dosing assists in DAF pretreatment. Dosing will be determined by bench testing prior to plant discharge. Dosing rates and quantities are entered into the PLC screen by the operator during the plant startup. The plant discharge will be sent to the front of the system to circulate the wastewater while bench testing is being conducted. Recirculation allows for bench testing under real-time process operations. Several sample ports are installed to sequentially bench test wastewater: Prior to placement into the storage tanks; prior to entry into the Flocculator; after the caustic, polymer and coagulant dosing; after a secondary polymer dosing location; after discharge from the DAF and prior to entry in the sanitary sewer system. Bench testing calculations will be documented and scaled up dosing rates applied and tested prior to entry in the sanitary sewer system. A brief description of the flocculator operations is detailed below:

The P-TEC PF Flocculator is a Plug Flow Type Pipe Flocculation Reactor fabricated with stainless steel piping with a stainless-steel stand. It includes mixing zones for both coagulation and

flocculation required for chemical treatment of most wastewater. The term "plug flow" refers to the fact that retention time and/or mixing energy is constant in any given cross section of the pipe. As such, all particles are subjected to the same amount of mixing energy for the same amount of time. This results in a highly uniform floc with excellent separation characteristics.

A coagulant is usually dosed to the raw water at the inlet of the flocculator. Immediately after the dosing point, a static mixer is installed for the mixing of the coagulant and the raw water. The reaction is completed in the pipe following the mixer. Mixing energy and reaction energy, in the mixers and the pipe are a result of turbulence (Reynolds number). Coagulation is the destabilization (by electrical charge neutralization) of the influent pollution particles into *microfloc* particles. When coagulation is completed, a flocculent is dosed just ahead of a second static mixer. Flocculation is performed by collecting and trapping these microfloc particles into larger *Macrofloc* particles by the use of long-chained synthetic polymers. These polymers usually have either a negative (anionic) or positive (cationic) charge. Mixing of the water and the flocculants takes place in a second static mixer. Floc growth is completed in the pipe, following the mixer.

The PF Flocculator allows for the addition of a portion of the DAF recycle flow containing dissolved air "whitewater" just after the flocculant. This enhances the floc's buoyancy by incorporating microbubbles *inside the floc's as they are forming*, which makes separation inside the DAF more efficient.

<u>3.3.4 DAF Operation</u> – Flocced wastewater enters the DAF and is blended and recirculated through an air blending pump. The blending pump produces microscopic bubbles that increase surface area contact with the flocced wastes and float the larger flocced particles to the surface. The cleaned wastewater is discharge through a weir, the flocced waste products are skimmed off of the top using a motorized skimmer. Skimmer speed and operation is dictated by quantity and type of flocced materials that are present. The operator is required to adjust as necessary.

The heavier materials are separated and sink to the bottom of the DAF. These heavy materials are discharged by a timed pneumatic valve. Sludge, grit, sand and wastewater are discharged into a 1,300-gallon tank and allowed to settle as necessary. Sludge is discharged to the roll-off for characterization and disposal, remaining wastewater is pumped to the front of the oil water separator for reprocessing.

A brief technical description of the DAF PTEC 175 operation is included below:

The HS Microwave is a "High Solids" Dissolved Air Flotation (DAF) system that utilizes a large free surface area for flotation in high solids loading applications. The system features all stainless-steel construction and is equipped with two high pressure recirculation (air dissolving) pumps; one pump operating and one pump as a 100% stand-by. System operation can be either manual or automatic using a PLC-based control panel that integrates with other installed equipment, (feed pumps, chemical feed systems, etc.). The raw water enters the unit through an inlet distribution box that spreads the flow of water across the width of the unit while decreasing its velocity. Once inside the unit heavy sand or grit particles settle into an inverted pyramid type cone where they are manually or automatically discharged through a settled solid drain. In

automatic operation, timers in the PLC periodically open a pneumatically operated valve. Whitewater from the recirculation system is dosed at the inlet of the unit to provide microbubbles that attach to the floc's giving them buoyancy to float them to the surface to form a floating layer. The floc is collected in the floating layer (sludge), a unique grid system is installed on the surface that aids in dewatering/thickening the sludge. The sludge is removed with a fulllength skimmer system. Sludge removal by the dewatering/skimmer system can be adjusted by water level. Adjustable outlet weirs are provided to set the level in the flotation unit in the optimum position. Treated water leaves the DAF via an effluent channel and overflow weirs. Part of the treated water is recycled through a specially designed pump to produce whitewater (micro-bubbles). Air is dosed in the aeration pump(s). Air flow meters are installed in the air supply control panel to adjust the volume of air metered into the recirculation pump(s). The pump(s) pressurizes the air/water mixture to 95 -110 psi in order to dissolve air into the recycle water (Henry's Law). Further dissolving of the air (as well as separation of any excess, undissolved air) takes place in the aeration header. From the aeration header, the whitewater is dosed to various points of the unit. Depressurization takes place in aeration ball valves, forcing the dissolved air to come out of solution to form micro-bubbles. Micro-bubbles attach to equally sized or larger particles. If a flocculator is installed before the flotation unit, part of the whitewater may be dosed into the flocculator to trap micro-bubbles inside the flocs as they are forming. These trapped micro-bubbles will stabilize the floc and keep it buoyant as it remains in the floating layer.

3.3.5 DAF Discharge Settling Tank – The treated clean water is allowed to settle in a 1,000-gallon poly tank after being discharged from the DAF. The water is gravity feed into the top of the tank and fills until a high float turns the discharge pump on, if the low float is activated the pump stops until the high-level float is activated.

3.3.6 Alarms and Plant Operation – The Pre-treatment system is equipped with several alarms to prevent spills and control discharge to sanitary sewer. The alarm on the plant stops all plant operation, closes all plant functions and indicates an audio and visual alarm that will require operator activity to restart. The alarms are as follows:

High Storage Tank Level – If the primary and secondary storage tanks are filled to 1' below overflow, the system and the alarm will indicate.

Flow Disparity – If the flow volume coming into the plant and leaving the plant are not within 2-3 % of each other the alarm will activate. If the volume of water calculated leaving the storage tanks is not within 2% of the volume calculated leaving the plant the alarm will indicate.

Dosing Pump Error – If the dosing pumps cannot supply required rate or required pH level or the backpressure is too high, the alarm will indicate.

DAF Dry – If the DAF tank does not have enough flow, the alarm will indicate.

Overflow in Containment Area – One inch of liquid in the containment area will set off the alarm.

3.3.7 Containment Structure Stormwater Management - Rainwater collected on the storage tank containment pad is collected by drainage runs that are installed and graded to a sump located in the southeast corner of the pad. The rainwater is collected and pumped to the front of the pretreatment system for treatment with all of the other plant wastewater. Plant operations require a startup procedure entered by the plant operator. The startup procedure requires the operator to check and position all valves, dosing rates, pump operations and calibrations prior to discharge.

3.3.8 Post DAF Wastewater Treatment Processes - To facilitate clarification and removal of dissolved metals in post DAF treated wastewater a hydroxide pH adjustment system was added to the process. The post DAF treated wastewater is pumped to the front side of tank 10. The wastewater is dose with sulfuric acid to lower the pH to 3.5. The wastewater is then pumped to the back side of tank 10 and the pH is adjusted to 10 by adding sodium hydroxide. The wastewater is allowed to settle for 12 hours and the pH is adjusted to 7-7.5 ph. The treated wastewater is then pumped through the ionic exchange system as described below. Periodically when necessary settled sediments and sludge is removed from tank 10 and placed in the sludge roll-off for analyses and disposal as described in Attachment 4 of this permit submission. An ionic exchange system was installed and covered on the tank farm pad. Wastewater that has been precipitated in tank 10 is pumped through this system at 30 gpm. A two-stage ionic exchange system with auto backwash removes and further clarifies the treated wastewater. The clarified wastewater is pumped into the 10,000-gallon poly tank 14 for final settling and clarification. Backwashed supernate is collected in tank 15. The wastewater is pumped from tank into the discharge piping for disposal to the POTW. Periodically when necessary settled sediments and sludge collected in tank 14 and contained in the supernate collection tank is removed and placed in the sludge roll-off for analyses and disposal as described in Attachment 4 of this permit submission.

3.3.8 Post DAF Recovered Oil Treatment Process – The 50 hp steam boiler system package unit was installed to facilitate DAF recovered oil water thermal separation. The system is run using a bath process. Oil that has been recovered by the DAF separation process is pumped into tank 9 through existing piping. The recovered oil is heated to 185 degrees F and residual water is separated from the oils. The heated oils rise to the top of the tank and the wastewater sinks to the bottom. The wastewater is pumped from the bottom and returned to tank 8 for retreatment through the DAF system and disposal to the POTW. Thermally treated recovered oil can cool and pumped to a dedicated frac tank (tank 6) on the offloading pad. The recovered thermally treated oil is loaded onto tanker trucks and recycled. Any additional liquids remaining in tank 6 are pumped to tank 8 for return to the DAF process and disposal to the POTW. The automated boiler system produces pressurized steam. The steam is piped through an automated temperature

feedback valve and into the heat exchanger installed in tank 9 and returned to the boiler water storage tank. The automated temperature valve is controlled by a thermocouple located in tank 9 and a setpoint control box located on the side of tank 9. The steam is pumped through the heat exchangers within the tank. The recovered oil is heated to 185 degrees to promote oil-water separation. Separated wastewater is pumped from the bottom of the tank for reprocessing through the DAF. Oil that has separated is pump to the oil storage fract tank 6 for recycling pickup.

3.4 Petroleum Contact Water PCW Management Acceptance Procedure Description

Prior to entry into the plant liquids impacted with petroleum or Petroleum Contact Water (PCW) wastes are verified by use of procedures outline in FAC 62-740. UES is not a producer of PCW. PCW acceptance procedures are similar to those utilized for used oil acceptance procedures outlined in Attachment 6 of this submittal. The following sections discuss the transportation, acceptance, treatment, and shipment of recovered oils from PCW treatment.

3.4.1 PCW Waste Acceptance Procedure - Transportation of PCW to the UES facility is typically conducted by non UES transporters. All PCW defined wastes are required to have associated documentation before the transport vehicle is allowed to offload into the PCW treatment system tanks. Prior to PCW acceptance into the treatment facility the plant operator records the PCW transporter shipment documentation into a PCW Acceptance Record and photocopies a copy for entry into a 3-ring binder maintained in the laboratory. The PCW Acceptance Record is attached as 3.4.1.5. A minimum of the following information must be recorded before offloading of PCW into the treatment facility can occur:

- 1. Name and address of the PCW producer.
- 2. Name and address of the PCW transporter.
- 3. Date of receipt of the PCW shipment.
- 4. Volume of the PCW received.
- 5. Tank ID where PCW was offloaded.
- 6. A copy of the shipping paper or manifest used for shipment of the PCW.

UES Used Oil Processing Facility Permit Application

The records are retained in a 3-ring binder maintained in the plant laboratory.

The plant operator will annually develop a submission that details the quantity of PCW received and the quantity of recovered product.

After acceptance of PCW delivery documentation, the UES plant operator will verify contents of the transport vehicle by use of the following procedures:

- 1. Take a sample of the PCW using a Coliwasa or dip tube and a glass container.
- 2. The sample is taken to the onsite laboratory and visually observed under light. If wastes appear to be hazardous or the operator believes the waste not be to PCW the load is rejected until proper documentation is provided to determine that waste id PCW.

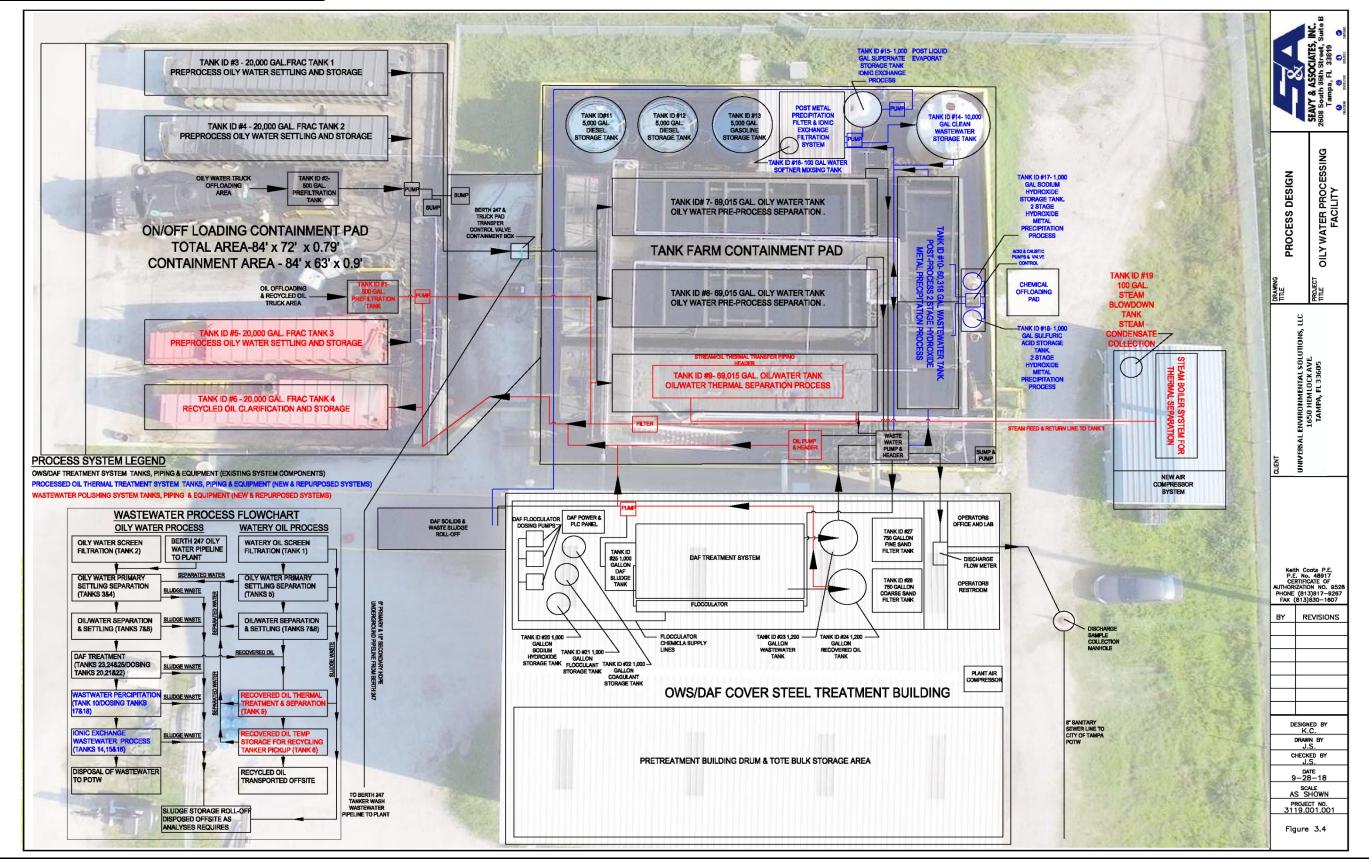
3. The operator will take pH and conductivity readings of the PCW waste liquids as well as conduct a flammability test. The pH must be greater than 4 and less than 10 and the flammability must fail. These readings are documented in the PCW Acceptance Logbook. After both PCW waste documentation acceptance and completion of the modified second knowledge test is conducted will the PCW waste will be offloaded into the PCW recovery tanks located onsite.

3.4.2 PCW Treatment Procedure - PCW wastes are filtered on the truck offloading through a screened tank (Tank 1 & 2) the PCW is temporary stored in tank 3 & tank 4 before being transfer to tank 7 or tank 8 and batched depending on plant operations and storage capacities available. PCW are allowed time to settle. Water is decanted periodically from the bottom of the fuel storage tanks into totes positioned inside of the tank containment area. When the plant personnel observe the interface of the fuel and water the procedure is stopped by closing the valve. Decanted water is then pumped into the treatment tanks (tank 7 or tank 8) for processing through the plant. The plant operator records the volume of water in the onsite logbook. Recovered fuel is loaded and shipped off site when sufficient quantity (tanker) is collected. The fuels are taken to a recycle center by Raider Environmental. The PCW is then pumped into the DAF system for oil separation. The oil is skimmed off of the DAF system, recover oils are skimmed into the oil recovery tank and pumped out to the repurposed recovered oil tank 9 located on the tank containment pad area. Water sent through the processing plant and into the DAF system for final oils removal and polishing. Wastewater is discharged from the DAF into tank 10 for precipitation and then through the ionic exchange system and disposed by entry into the POTW sanitary sewer system. Oil water separator and grit removal operation are detailed in Section 3.3.2 of this attachment. DAF operation is detailed in Section 3.3.4. The POTW wastewater permit and industrial wastewater permit classification are detailed in Attachment 4 of this submission.

3.4.3 Reclaimed Oil Storage and Removal – Recovered oils from the separation process are stored in the 20,000-gallon frac tank (tank 6) located on the frac tank containment pad. The recovered oil tank is emptied when the tank capacity exceeds 75% or quarterly. Raider Environmental is contracted to remove, transport and process the recovered oil. Recovered oil is profiled and manifested and a copy of the disposal manifest is retained in a 3-ring binder located in the laboratory.

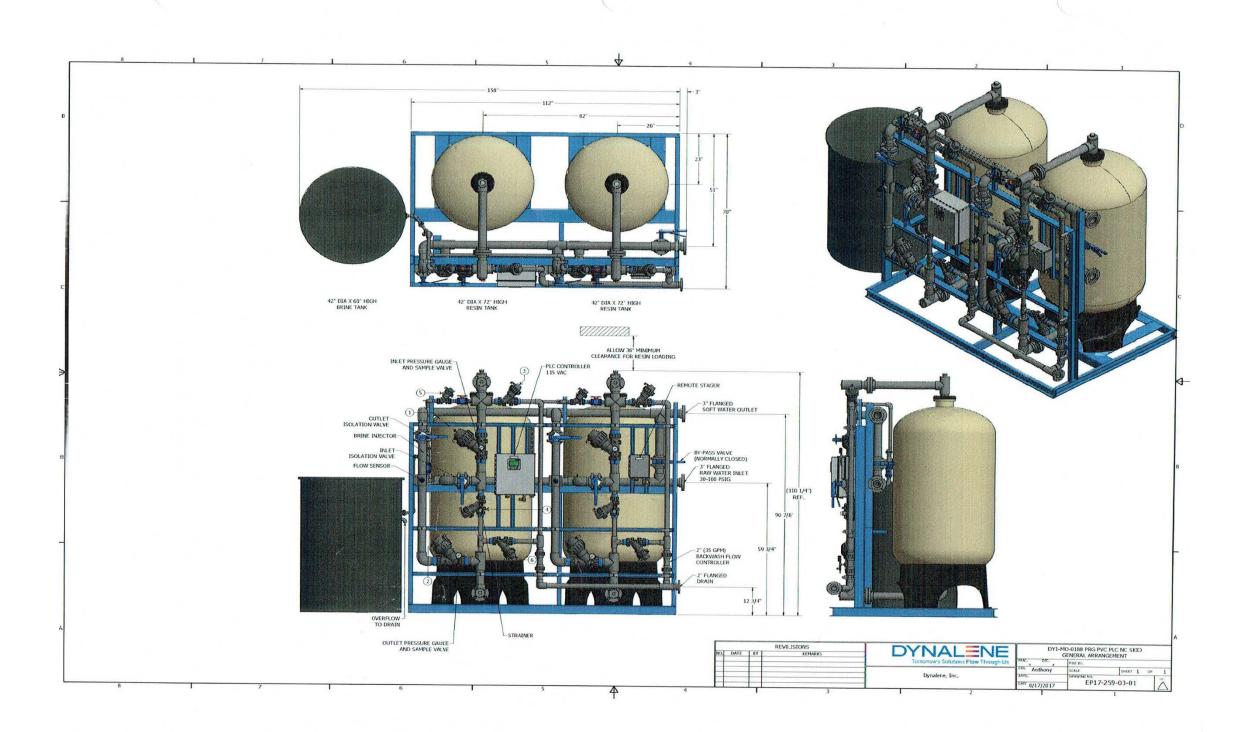
Attachment 3 Revision 4 Page 27

3.4 Attachment A - Section 3 Process Flow Diagram



Attachment 3 Revision 4 Page 28

<u>3.4 Attachment B – Section 3 Dynalene Ionic Exchange System Design Diagram</u>



02/19/19

ATTACHMENT 4 - WASTE ANALYSES AND SAMPLING PLAN

Revision 3 Attachment 3 Modifications - No text changes have been added to this attachment. The page numbers, revision number and dates have been updated. Rev 4 No changes 4.0 WASTE ANALYSES and SAMPLING PLAN (WASP)

This document is a Waste Analysis and Sampling Plan (WASP) prepared for use by Universal Environmental Solutions, Inc. (UES) located at 1650 Hemlock Ave in Tampa, Florida. UES conducts services associated with the treatment and recycling of petroleum contact water (PCW) and emulsified oils in waters created by ship cleaning and offsite deliveries. UES is not a small or large quantity hazardous waste generator or transporter.

The WASP is required for a large or small hazardous waste generator who treats hazardous waste to meet applicable Land Disposal Restrictions (LDR), a permitted hazardous waste treatment, storage, or disposal (TSD) facility, or a used oil processor and used oil marketer.

This WASP is required because UES is a used oil processor. The WASP will also be used if UES treats a hazardous waste to meet applicable Florida Department of Environmental Protection (FDEP) requirements. UES is not a permitted to accept or process hazardous listed waste. The WASP will also be used as a guide to document waste analysis procedures that are used for the receipt of non-hazardous waste and materials that are brought into the UES facility. The purpose of this Waste Analysis Plan (WASP) is to also document the required sampling and analytical methods as well as the quality control/quality assurance (QA/QC) procedures that are used to ensure that used oil accepted from UES customers meets allowable limits. This WASP will also be used to ensure that specification for used oils recycled by UES meets required specifications as per applicable State and Federal requirements.

This WASP has been divided into four sections. *Section One* is a description of Facility and Process procedures. *Section Two* contains Sampling Procedures; *Section Three* contains information on the various analytical tests that are used for rendering waste determinations, total halogen tests for used oil, and testing for used oil fuel product specifications. *Section Four* of this WASP pertains to UES acceptance, handling, processing and testing of used oil as a transporter, processor, and recycler of used oils and rebuttable procedures.

4.1 GENERAL FACILITY DESCRIPTION AND PROCESS INFORMATION

Historically, shipyard cleaning and decontamination operations have been costly and performed by outside service providers. UES is an affiliate operation of two large shipyards: Gulf Marine Repair and the Hendry Corporation. The UES facility is located at the Port Hendry Terminal. UES has been developed to expand onsite operations of these respective shipyards. This operation is an effort to reduce costs by internalizing this important shipyard function. Critical to this strategy is the pre-treatment facility to streamline cleaning and decontamination processes and the large volumes of wastewater generated. UES contracted two Tampa based engineering businesses that have extensive experience in wastewater design, engineering and construction, SCS Engineers and Seavy & Associates, Inc., to assist them in the design, construction and operations of the Bilge & Oily Water Pre-treatment Plant (plant). As detailed in the initial evaluation of the service request submittal; UES intends to operate this plant on a continual basis with discharge to the POTW occurring when processing operations are complete. The plant design methodology included implementation of alarm and safety

systems to eliminate or reduce risks in the loading, transport, offloading, storage, and disposal wastewater created by cleaning and decontamination activities.

4.1.1 UES Material Acceptance Requirements - UES has established procedures for the acceptance and handling of materials that are brought into the facility. Many of these procedures have been developed by best management and regulatory permitted practices. UES accepts materials through a contract or purchase order. Only pre-approved shipments are received at the facility. UES customers are required to submit waste determination documentation (UES Waste Profile) that may be based upon generator process knowledge, material data safety sheets, and/or analytical testing. UES reviews this information as part of its acceptance procedures. This process helps to ensure that only approved materials are accepted at the UES facility. This process also helps UES address questions as to whether or not the waste or material that is accepted is regulated or exempt, is a listed or characteristic waste, is a special waste, or a material that will not be accepted. Waste determinations for residuals and waste produced by UES as part of its facility operations are based upon a generator's process knowledge, material safety sheets annually renews waste profiles with solid waste facilities that accept UES solid waste. This includes requirements for analytical testing. Analytical testing is also performed to ensure that on-specification discharges from the facility to the local POTW are compliant with local wastewater regulations.

4.1.2 Record Keeping - Used oil and waste or materials that are accepted at the UES facility require the customer to prepare and/or sign a bill of lading or nonhazardous waste manifest. UES maintains required tracking information and documentation that is required for a used oil transporter and used oil processor. Reports are filed with the FEDP as per the applicable regulations. Copies of the representative forms are provided as an attachment to this WASP. The FDEP requires the completion of annual forms. UES maintains its documentation for a minimum of three years as per applicable regulations on record keeping.

4.2 SAMPLING PROCEDURES

4.2.1 Representative Samples - When UES collects samples for analytical testing, samples are collected in accordance with FDEP approved methods, and a protocol to assure that a representative sample is collected. The samples are sent to an FDEP approved and licensed laboratory, under a chain of custody. Samples are analyzed in accordance with *written procedures outlined in FDEP and "Test Methods for Evaluating Solid Waste, Physical/Chemical Methods," U.S. Environmental Protection Agency (EPA) Publication No. SW-846, Third Edition, Chapter 1 (November 1986), and its updates.*

Each parameter and its applicable analytical method are provided in the certified laboratory's Quality Assurance and Quality Control (QA/QC) Plan. All sampling procedures are designed and performed in a manner to ensure that samples are representative of the bulk material from which they are taken.

Based upon sample design, sample approaches may vary based upon the sample purpose, type of material to be sampled and the type of container. Sample approaches may include composite samples for large tanks, discrete grab samples, unbiased random sampling, biased or authoritative samples based upon knowledge of the materials to be sampled. Sampling strategies are also based upon the materials to be collected and the purpose of the analysis. Random sample patterns may include simple, stratified or systematic, dependent upon sampling objectives.

4.2.2 Representative Sampling Procedures:

> Prior to conducting sampling, personnel are required to wear the proper level of personnel protective equipment. This may include gloves, safety glasses, (with face shields) and respirators as required.

Safety equipment is also required for assessing tanker truck and tanks, including required fall protection.

Prior to sampling trucks, the pressure or vacuum must be relieved from the vessel by the driver. Upon confirmation, the hatch levers will be slowly released until the hatch can be safely opened. The coliwasa or bailer will be lowered into the tank to obtain a representative sample.

Samples collected from tanks will involve the collection of a representative sample from the sample ports on top or at the base of the tank or hose, taking to account the heterogeneous layering in the tank that may include solids, water, and oil. Samples may be collected in clean and approved buckets, bottles or sample containers, bailer, large tank coliwasa, or similar sampling device.

Samples collected from containers or carboys will involve the collection of representative samples. Dependent upon the consistency and state of the material, samples may be collected using a clean coliwasa, drum thief, bailer or dipper, based upon the substance to be sampled and the configuration of the container (open head, closed head, or screw top, etc.).

Samples collected from bins, roll-off boxes or totes will be representative samples that may include scoops or core samples based upon depth, access, stratification of the material in the bin.

Samples that are collected are to be labeled and maintained under a chain of custody.

Clean sample containers that are used are provided by the licensed analytical lab. The size, type, and any preservatives in the container are based upon the analytical test that is being requested and are provided by the lab. Sample quality control is maintained and may include temperature blanks for samples that must be kept at a certain temperature. Other quality control may include trip blanks and equipment blanks as required based upon the type of sampling and applicable requirements. UES takes split samples and duplicate samples periodically based upon the circumstance as determined by QA/QC need, the request of a customer or regulatory agency. Sample VOAs may also be used for the collection of liquid samples that require zero headspace. Compliance samples are analyzed at a licensed / accredited lab (Pace). Analytes tested are based upon purpose and requirements, product quality control and assurance, or as required by offsite disposal facilities or UES customers.

4.3 ANALYTICAL TESTING

4.3.1 Analytical Tests - Analytical testing is completed for a variety of purposes. This may include waste determinations, waste profiles, constituent screening, and quality control. Waste is required to be profiled and applicable LDR certifications are required. These are updated annual. UES may render waste determinations and deny acceptance or disposal based upon analytical testing or generator knowledge. Analytical testing may be required for characteristic hazardous waste. Waste determinations can also be rendered by the generator based upon generator process knowledge which may include material safety data sheets. UES currently utilizes Pace for screening and compliance analytical testing. UES also completes analytical testing as part of the process used to send non-RCRA regulated solid waste to approved disposal facilities. Solid waste facility approvals typically require the

completion of a waste profile. On an annual basis, analytical testing is also typically required. UES follows the waste acceptance procedures that are required by the solid waste facility. Waste that is sent to solid waste landfills may include non-hazardous waste derived from the UES facility or waste that is derived through UES customers. UES also conducts analytical testing for meetings its obligations as a used oil transporter, processor, and marketer. In addition to compliance testing completed by Pace, UES uses field testing for finger print analysis and screening onsite. Raider Environmental (Mulberry) or January Environmental (Bartow) recycles the waste recovered oils created by the separation process.

Table 4.3-1 of the following page provides a general listing of the analytical tests used by UES for various purposes under this WASP. The information includes parameters, analytes, when the test is used, notes and frequency of testing.

Attachment 4 Revision 4 Page 33

Table 4.3-1: Analytical Testing:

Parameter	Test Method	Constituents	When Used	Notes	Frequency
TCLP Extraction	SW 1311	TCLP Extraction	When documenting hazardous waste TCLP hazardous waste characteristics	1311 extraction may not be required if sample is 100% liquid with less than 0.5% suspended solids.	As needed for hazardous waste determinations
ICP Metals RCRA (7)	SW 6010B	Cadmium, chromium, arsenic, lead, silver, selenium, barium	Testing for RCRA 7 Metals, use extraction 1311 to document TCLP characteristics. Arsenic, lead, cadmium chromium also analyzed for on-spec oil testing	Method 6010B is used for solid samples including soil, sludge, sediments or concentrated liquids.	As needed for hazardous waste determination, every 20,000 gallon tank for fuel specification
Mercury	SW 7470A	Mercury Aqueous Sample	Testing Mercury, use extraction 1311 to document TCLP characteristics	Use 7471A for Mercury Solid Sample	As needed for hazardous waste determination
ICP Metals (All)	SW 6010B	31 metal constituents	Metals screen, more than RCRA Metals, may be used to help document LDR underlying Constituents	Specify metals, reference all, target metals or RCRA metals.	As needed for screen, underlying constituents or solid waste profiling
RCRA Volatiles	SW 8260B (14 RCRA Constituents)	14 RCRA volatile organic constituents	Used with TCLP 1311 to document RCRA VOC constituents. Use for solid samples including soil, sludge, sediment, or concentrated liquids	1311 extraction may not be required if sample is 100% liquid with less than 0.5% suspended solids.	As needed for hazardous waste determination, solid waste profiling, used

Attachment 4

Revision 4

			Page 34		
Parameter	Test Method	Constituents	When Used	Notes	Frequency
RCRA Semi- Volatiles	SW 8270C (18 RCRA Constituents)	18 RCRA semi- volatile organic constituents	Used with 1311 to document RCRA semi- volatile organic constituents. Use for solid samples including soil, sludge, sediment, or concentrated liquids	1311 extraction may not be required if sample is 100% liquid with less than 0.5% suspended solids.	As needed for hazardous waste determination or solid waste profiling
Volatiles	SW 8260B	62 Volatile Constituents	Can be used as a screen or for target analytes. May also be used to help identify underlying hazardous waste constituents.	samples including soil,	As needed for screen or solid waste profiling
Semi-Volatiles	SW 8270C	65 Semi-Volatile Constituents in Test	Can be used as a screen or for target analytes. May also be used to help identify underlying hazardous waste constituents. Test also includes PAHs for testing excavated and regulated PCS contaminated soil.	including soil, sludge, sediment, or concentrated liquids. Regulated PCS requires special approval to	profiling
PAHs	SW 8310	16 Polynuclear Aromatic Hydrocarbons	Petroleum Contaminated Soil screening for PAHs. SRC does not transport or handle regulated PCS waste.	excavated PCS is regulated	As needed for screen or solid waste or special waste profiling.

			Page 35		
Parameter	Test Method	Constituents	When Used	Notes	Frequency
Total Halogens	SW 9077	Total chlorides in new and used oil	Used as screen for total halogens (above or below 1,000 ppm)	Field Test Dexsill Chlor-D- Tect 1000	Used oil pickups and deliveries
Total Halides	SW 9020	Total Halides in new and used oil	Used as screen for total halogens (above or below 1,000 ppm)	Field Test Dexsill Chlor-D- Tect 1000	Used oil pickups and deliveries
Oil Sulfur	ASTM D4294	Sulfur in Oil	Specification oil product quality	X-Ray Fluorescence Spectroscopy	Every 20,000 gallon tank
PCBs	SW 8082	7 types of aroclor compounds	Screening for PCB required for certain customers. Test also used for on specification fuel oil quality control		As needed for used oil from California, electrical transformers and every 20,000 gallon tank
Corrosivity (Aqueous)	SW 9040C	рН	Aqueous samples (has measurable pH, must contain at least 20% free water by volume	Hold times are limited requires immediate analysis or flag noted	As needed for hazardous waste determinations or profiling
Corrosivity (Liquid)	SW 1110A	рН	Non-aqueous liquid sample. Many aqueous samples are liquids so may need to run both tests if hydrogen ions do not disassociate on 9040C	Test is based upon steel corrosion rates (see RO 13561 or Test Method)	As needed for hazardous waste determinations or profiling
Free Liquids	SW 9095B	Free Liquids Paint Filter Test	Used for determining if a waste is a liquid if required	Liquid for flashpoint or pH tests, may also use pressure test in 1311 if needed.	

4.4 UES USED OIL ACCEPTANCE PROCEDURES TO MEET THE REBUTTABLE PRESUMPTION REQUIREMENTS

For used oil shipments, customers are required to enter into an agreement and provide information on their regulatory status and used oil handling practices as required. The UES plant operator conducts an EPA approved test for total halogens on used oil prior to delivery and acceptance of the used oil shipment. Customers are required to sign a bill of lading or nonhazardous waste manifest, dependent upon the shipment and the results of the testing. UES utilizes a contract for its used oil burner customers. For other customers, UES utilizes a purchase order agreement. Prior to accepting used oils or petroleum contact water from its customers, UES enters into an agreement and obtains information on the type of oil. If the source of oil is from a transformer, UES also requires PCB analytical testing, total halogen, flash point, and BTU analysis of the used oil as described in this WASP. Prior to UES picking up oil, UES transport drivers conduct testing of the oil to confirm the halogen content of the used oil. This test is performed using a "TIF XP – 1A Automatic Halogen Leak Detector" A "Dexsil Chlor-D-Tect 1000 [®] test kit. The results of the test are marked on the shipping papers. If the total halogen content meets or exceeds 1,000 ppm total halogens, then UES will require the used oil generator to prepare a rebuttable presumption certifying that the used oil was not mixed with a listed hazardous waste. UES provides the customer with a certification form and instructions. In order to rebut the presumption that the used oil is not mixed with a hazardous waste, the customer is advised to have a sample of the used oil analyzed by a certified analytical lab and make the determination based upon the analytical results. The recommended analytical test is SW 8260B. The used oil customer may also rebut the presumption under certain circumstances if the oils contain chlorinated paraffin's or applying other knowledge of the halogen content of the used oil in light of the materials or processed used.

A used oil generator who is unable to rebut the presumption will need to ship the used oil as a hazardous waste to a designated facility for disposal. If the used oil generator rebuts the presumption based upon chlorinated paraffin's, analytical testing, or generator knowledge, UES will require documentation. UES also requires the following certification:

I certify that the used oil in this shipment has not been mixed with a listed hazardous waste, based upon my understanding of the hazardous waste and used oil regulations. I have based my determination upon the following information that is attached to this certification statement as required: __analytical testing, __material safety data sheet, __generator knowledge.

The used oil customer signs the form and based upon the information, UES either accepts the load, rejects the load or retests the load. Used oil shipments, that may be delivered by other used oil transporters requires similar information in terms of documentation. UES also tests the incoming used oil shipments to its facility and maintains the required documentation in accordance with applicable regulations. UES maintains a similar process for documenting acceptance as a used oil processor. UES maintains used oil records as a transporter and processor. Annual reports are also submitted to the FDEP on forms that are provided (see attachment).

UES does accept off specification used oil for processing and blending to make it on-specification used oil fuel. Other analytical tests as described in this WASP (Table 1) are used for screening, testing and to confirm that on specification used oil standards are met prior to product distribution.

The requirements and parameters for on specification fuel are provided in Table 4.4-1. Regulatory and WASP notes associated with this table are also provided. Sampling procedures for testing were described in *Section Four-Two* of this WASP. Sample collection procedures are consistent with Appendix-1 of 40 CFR Part 261 and other Florida applicable requirements.

TABLE 4.4-1:

On Specification Used Oil Fuel Parameters*

Constituent or Property Allowable Level Test Method SW-846

Arsenic 5 ppm maximum (EPA 6010B)	Cadmium 2 ppm maximum (EPA 6010B)
Chromium 10 ppm maximum (EPA 6010B)	Lead 100 ppm maximum (EPA 6010B)
Flash Point 100 F minimum (EPA 1010A)	Total Halogens 1,000 ppm maximum (EPA 9075)
PCBs Less than 2 ppm (EPA 8082)	

Note: Applicable standards for the burning of used oil containing PCBs are imposed by 40 CFR 761.20(e). (UES WASP Note- Used oil containing less than 50 ppm PCBs is regulated under the used oil regulations; however, TSCA requirements will also apply for the burning of the oil. If the PCB concentration is 2 ppm or greater, TSCA limits the marketing of the used oil to a TSCA qualified incinerator or other marketers who market off specification used oil for energy recovery. The term qualified incinerator means a PCB incinerator, a high efficiency TSCA approved boiler, a RCRA incinerator, or an off spec used oil industrial boiler or furnace provided certain conditions are met. PCBs at concentrations of 50 ppm or greater are regulated by TSCA. There are also PCB dilution prohibitions. UES does not accept PCB contaminated used oil.)

The allowable levels do not apply to mixtures of used oil and hazardous waste that continue to be regulated as hazardous waste (see §279.10(b)). Used oil containing more than 1,000 ppm total halogens is presumed to be a hazardous waste under the rebuttable presumption provided under §279.10(b)(1). Such used oil is subject to subpart H of part 266 of the RCRA regulations rather than the used oil regulations when burned for energy recovery unless the presumption of mixing can be successfully rebutted. (UES WASP Note: Even if the presumption of mixing has been successful, concentrations of total halogens in used oil greater than the 1,000 ppm are off specification). Metal values are based upon total metals and not TCLP values.

Attachment 4 Revision 4 Page 38

Is the used oil Yes known to be mixed with listed hazardous waste No Is the total halogen content in No the used oil above 1,000 ppm? Yes Manage as Hazardous Waste Does a regulatory exclusion apply? • Is the used oil a metalworking fluid with chlorinated paraffins? • Is the used oil contaminated with CFC refrigerants that will be • Has the used oil been mixed with CESQG hazardous waste? Has the used oil been mixed with RCRA-exempt waste? Manage as Used Oil under **Part 279** No Used oil presumed to be mixed with listed hazardous waste Yes No Can the handler Does the used oil document the source of contain significant Yes No the halogenated concentrations of hazardous constituents as ogenated hazardou other than listed constituents? hazardous waste?

TABLE 4.4-2: REBUTTABLE PRESUMPTIVE ANALYSIS FLOW CHART

4.4.2 Requirements §279.55 Analysis Plan - Owners or operators of used oil processing and re-refining facilities must develop and follow a written analysis plan describing the procedures that will be used to comply with the analysis requirements of §279.53 and, if applicable, $\frac{$279.72}{100}$ The owner or operator must keep the plan at the facility.

(A) *Rebuttable presumption for used oil in §279.53.* At a minimum, the plan must specify the following:

(1) Whether sample analyses or knowledge of the halogen content of the used oil will be used to make this determination.

(2) If sample analyses are used to make this determination:

(i) The sampling method used to obtain representative samples to be analyzed. Representative samples may be obtained using either:

(A) One of the sampling methods in appendix I of part 261 of this chapter; or

(B) A method shown to be equivalent under §§260.20 and 260.21 of this chapter;

(ii) The frequency of sampling to be performed, and whether the analysis will be

performed on-site or off-site; and

(iii) The methods used to analyze used oil for the parameters specified in §279.53; and

(3) The type of information that will be used to determine the halogen content of

the used oil.

(b) On-specification used oil fuel in §279.72. At a minimum, the plan must specify

the following if §279.72 are applicable:

(1) Whether sample analyses or other information will be used to make this determination;

(2) If sample analyses are used to make this determination:

(i) The sampling method used to obtain representative samples to be analyzed. A representative sample may be obtained using either:

A) One of the sampling methods in appendix I of part 261

of this chapter; or

(B) A method shown to be equivalent under §§260.20 and 260.21 of this chapter;

(ii) Whether used oil will be sampled and analyzed prior to or after any

processing/re-refining;

(iii) The frequency of sampling to be performed, and whether the analysis will

be performed on-site or off-site; and

(iv) The methods used to analyze used oil for the parameters specified in

§279.72; and

(3) The type of information that will be used to make the on specification used oil fuel determination.

4.4.3 UES Compliance with §279.55 and 62-710, FAC Analysis Plan Requirements - This WASP represents UES efforts to document and describe its procedures as a used oil processer/re-refiner. UES follows this WASP to comply with the analysis requirements of §279.53 pertaining to the rebuttable presumption for used oil and §279.72 which pertains to used oil marketer requirements for on specification used oil fuel. UES maintains this WASP at its facility in Tampa FL. The UES WASP specifies for the rebuttable presumption for used oil to make this determination.

Used oil is tested using approved analytical methods when the used oil is picked up when UES is a transporter. Based upon the test results, that are described in *Section One* to *Section Three* of this WASP, the used oil is either accepted or rejected prior to being transported or accepted at the UES facility. Incoming trucks where UES is not the transporter are also tested for total halogens and total halogen tests are conducted through an offsite ADHS certified lab after each 20,000 gallon tank of on specification used oil is processed and before it is marketed for distribution.

Sampling methods used to collect and analyze representative samples are described in *Sections Two and Section Three* of this WASP and are in conformance with Appendix I of part 261 of the RCRA regulations or an equivalent method under §§260.20 and 260.21 of the RCRA regulations. This WASP also describes the frequency of sampling to be performed, and whether the analysis will be performed on-site or off-site; and the methods used to analyze used oil for the parameters specified in §279.53 (*Tables 4.3.1* of this WASP). The information provided in this WASP describes the information that will be used to determine the halogen content of the used oil.

This WASP also specifies the sampling procedures and the analytical testing that will be used to document on specification fuel oil that is processed and marketed through UES. *Tables 4.3.1* provide this information. Sampling methods provide for the collection of a representative sample. Representative sampling methods are in conformance with appendix I of part 261 of the RCRA regulations or an equivalent method under §§260.20 and 260.21 of the RCRA regulations. This WASP also describes the frequency of sampling to be performed, and whether the analysis will be performed on-site or off-site; and the methods used to analyze used oil for the parameters specified in §279.72. This analytical data provides information to make the on specification used oil fuel determination. Oil is sampled upon receipt (prior to processing) and after processing but before used oil fuel distribution. Records and tracking documents are maintained as per the referenced regulations.

4.5 Facility Industrial Wastewater Permit

The UES Oily Bilge Water Treatment plant facility was granted an Industrial Wastewater discharge permit #1112 by the City of Tampa Industrial Wastewater Department. The wastewater permit was submitted under 40 CFR Part 437 - Subpart D Centralized Waste Treatment Point Source Category - Multiple Waste streams. The permit allows discharge of fully retreated wastewater to the Curran treatment plant. The permit details the discharge requirements, wastewater discharge limits, sampling frequency, and maximum flow rates and quality controls requirements.

The UES plant operator is responsible for conditions detailed in the permit including confirmation sample collection, documentation and recording.

4.5.1 Approved City of Tampa Wastewater Department Industrial Wastewater Permit #1112

CITY OF TAMPA Bob Buckhorn, Mayor

Wastewater Department

Anthony L. Kasper, P.E. Director

Mr. Ed Kinley Universal Environmental Solutions, LLC P.O. Box 76105 Tampa, FL 33675

March 4, 2014

Re: Issuance of an Industrial Wastewater Discharge Permit to Universal Environmental Solutions, LLC, by the City of Tampa, Wastewater Department.

Dear Mr. Kinley:

The enclosed issued permit, No. <u>1112</u>, governs the wastewater discharge from the facility located at 1650 Hemlock St., Tampa, Florida 33605, into the City of Tampa's wastewater collection system. All discharges from this facility and actions and reports relating thereto shall be in accordance with the terms and conditions of this permit.

There are two copies of the "Acceptance of Permit" page at the end of the discharge permit with a block reserved for your signature indicating acceptance of the limitations and conditions specified in the permit. Please sign both copies of the page, retain one copy with the permit, and return one of the signed copies to Mr. John Daily, City of Tampa, Industrial Waste Section, 2700 Maritime Blvd., Tampa, FL 33605.

If you have any questions about this permit please do not hesitate to contact Mr. Daily at (813) 247-3451, ext. 55222.

Sincerely,

Anthony L. Kasper, P.E.

Director Wastewater Department

ALK:jmd

2700Maritime Boulevard • Tampa, Florida 33605 • (813) 247-3451 • FAX: (813) 248-5269

WWW.tampagov.net

CITY OF TAMPA

WASTEWATER DEPARTMENT

INDUSTRIAL WASTEWATER DISCHARGE PERMIT

City of Tampa Wastewater Department Industrial Wastewater Discharge Permit

Cover Page

Permit No._1112

In accordance with the provisions of Section 26-122 of the City of Tampa Code:

Company Name	Universal Environmental Solutions, LLC				
Address	1650 Hemlock St.				
	Tampa, FL 33605				
Telephone Number	(813) 390-0659				
Name of Applicant	Ed Kinley				

Is Universal Environmental Solutions, LLC, a Florida Profit Corporation, with principal place of business located at 1650 Hemlock St., Tampa, Florida 33605, herein referred to as "permittee," is hereby authorized to discharge industrial wastewater from the above identified facility and through the outfalls identified herein, and hereinafter referred to as "facility," into the City of Tampa sewer system in accordance with the conditions set forth in this Industrial Wastewater Discharge Permit, hereinafter referred to as the "permit." Issuance of this permit shall not be construed as a representation by the City of Tampa that the permittee herein complies with the terms and conditions of this permit, and does not relieve the permittee of its obligation to comply with all Federal and State pretreatment standards or requirements or with other applicable requirements under Federal, State, and/or local laws, rules, and regulations, including, but not limited to, Chapter 26 of the City of Tampa Code, and the provisions of the City of Tampa's Wastewater Discharge and Industrial Pretreatment Standards Technical Manual as updated March 2013, as amended, hereinafter referred to as the "Technical Manual." Compliance with this permit does not relieve the permittee of responsibility for compliance with all applicable Federal and State pretreatment standards, including those which become effective during the term of this permit. Noncompliance with any term or condition of this permit shall constitute a violation of Chapter 26 of the City of Tampa Code entitled "Utilities" and the Technical Manual.

This permit shall become effective on and shall expire at midnight on

March 1, 2014 February 28, 2016

If the permittee wishes to continue to discharge after the expiration date of this permit, an application must be filed for a renewal permit a minimum of ninety (90) days, in accordance with the requirements of Section 4.5 of the above described Technical Manual, prior to the expiration date.

Director Date

Wastewater Department

Page 1 of 25

Industry Name_____Universal Environmental Solutions, LLC

Permit No. 1112

PART 1 - APPLICABLE EFFLUENT LIMITATIONS

SECTION 1 - EFFLUENT DISCHARGE LIMITS

A. During the period of this permit, the permittee is authorized to discharge process wastewater to the City of Tampa from only the outfall described below.

Description of outfalls:

Outfall	Description	
001	Outfall 001 is the manhole located several feet east of the pretreatment building. All process wastewater is discharged to the City of Tampa from this outfall.	

B. During the period of this permit the discharge from outfall 001 must comply with the following pretreatment regulations established in 40 CFR Part 437 - Subpart D (Centralized Waste Treatment Point Source Category -Multiple Wastestreams).

	40 CFR Part 437 - Subpart D
Centralized Waste	Treatment Point Source Category - Multiple Wastestreams
437.47	Pretreatment Standards for New Sources (PSNS)

Parameter	Maximum Daily Milligrams per liter (mg/l)	Maximum Monthly Avg. Milligrams per liter (mg/l)
	0.249	0.206
Antimony	0.162	0.104
Arsenic	0.474	0.0962
Cadmium	0.746	0.323
Chromium	0.192	0.124
Cobalt	0.500	0.242
Copper	0.350	0.160
Lead	0.00234 1	0.000739 ²
Mercury	3.95 ¹	1.45 ²
Nickel		0.0351
Silver	0.120	0.120
Tin	0.409	0.0618
Titanium	0.0947	0.0662
Vanadium	0.218	
Zinc	2.87	0.641
Page 2 of 25		

lustry Name <u>Universa</u>	al Environmental Solutions, LLC	Permit No11
Parameter	Maximum Daily Milligrams per liter (mg/l)	Maximum Monthly Avg. Milligrams per liter (mg/l)
Bis(2-ethylhexyl) phthalate	0.215	0.101
Carbazole	0.598	0.276
o-Cresol	1.92	0.561
p-Cresol	0.698	0.205
n-Decane	0.948	0.437
Fluoranthene	0.0537	0.0268
n-Octadecane	0.589	0.302
2,4,6-Trichlorophenol	0.155	0.106

¹ - Note that the limitations in PART 1 SECTION 1 Paragraph C are more stringent.

² - City of Tampa code does not establish Maximum Monthly Average concentration limits, however the concentration of any pollutant regulated by City of Tampa code and discharged into the wastewater treatment system cannot exceed the applicable Daily Maximum concentration limit. Note that the limitations in PART 1 SECTION 1 Paragraph C are more stringent.

C. During the period of this permit the discharge from the facility at the point where the discharge enters the City's sanitary sewer system shall not exceed the following effluent limitations. In addition, the discharge shall comply with all applicable regulations and standards contained in Chapter 26, City of Tampa code.

Parameter	Daily Maximum mg/l
Arsenic as As	0.21
Beryllium as Be	0.001
Cadmium as Cd	0.13
Chromium as Cr (Total)	2.77
Copper as Cu	0.67
Lead as Pb	0.80
Mercury as Hg	0.0002
Molybdenum as Mo	0.10
Nickel as Ni	0.42
Selenium as Se	0.47
Silver as Ag	1.80
Zinc as Zn	4.60
Oil & Grease (Mineral fraction)	100.0
pH	6.0 - 11.0
505	

Page 3 of 25

Industry Name_____Universal Environmental Solutions, LLC

Permit No. 1112____

PART 2 - MONITORING AND REPORTING REQUIREMENTS

SECTION 1 - MONITORING REQUIREMENTS

A. During the period of this permit, the permittee shall monitor outfall 001 for the following:

Parameter	Location	Frequency	Sample Type
рH	(1)	(2) Quarterly	(3) Grab
Antimony	(1)	(2) Quarterly	(3) Grab
Arsenic	(1)	(2) Quarterly	(3) Grab
Cadmium	(1)	(2) Quarterly	(3) Grab
Chromium	(1)	(2) Quarterly	(3) Grab
Cobalt	(1)	(2) Quarterly	(3) Grab
Copper	(1)	(2) Quarterly	(3) Grab
Lead	(1)	(2) Quarterly	(3) Grab
Mercury	(1)	(2) Quarterly	(3) Grab
Nickel	(1)	(2) Quarterly	(3) Grab
Silver	(1)	(2) Quarterly	(3) Grab
Tin	(1)	(2) Quarterly	(3) Grab
Titanium	(1)	(2) Quarterly	(3) Grab
Vanadium	(1)	(2) Quarterly	(3) Grab
Zinc	(1)	(2) Quarterly	(3) Grab
Bis(2-ethylhexyl) phthalate	(1)	(2) Quarterly	(3) Grab
Carbazole	(1)	(2) Quarterly	(3) Grab
o-Cresol	(1)	(2) Quarterly	(3) Grab
p-Cresol	(1)	(2) Quarterly	(3) Grab
n-Decane	(1)	(2) Quarterly	(3) Grab
Fluoranthene	(1)	(2) Quarterly	(3) Grab
n-Octadecane	(1)	(2) Quarterly	(3) Grab
2,4,6-Trichlorophenol	(1)	(2) Quarterly	(3) Grab
Purgeable Organics	(1)	(2) Quarterly	(3) Grab
Total Dissolved Solids	(1)	(2) Quarterly	(3) Grab
Chloride	(1)	(2) Quarterly	(3) Grab

(1) - Outfall 001

(2) - January, April, July, and October

(3) - Definitions of sample types are located in PART 4 SECTION 1 of this permit. Page 4 of 25 Industry Name Universal Environmental Solutions, LLC Permit No. 1112

B. Analytical Requirements

10 1

- All activities related to sampling and analysis shall be performed in accordance with Chapter 62-160, F.A.C. and 40 CFR 136 as appropriate. Sample collection methods shall be consistent with the standard operating procedures defined in the most recent revisions of DEP-SOP-001/01. Analyses must be performed by a laboratory certified by the State of Florida, Department of Health, Bureau of Laboratories, to be in compliance with the NELAC (National Environmental Laboratory Accreditation Conference) Standards and FAC Rule 64E-1 regulations for the examination of environmental samples in the appropriate category.
- 2. Where sampling or analytical techniques for a pollutant are not available or approved, or where the State of Florida, Department of Environmental Protection (FDEP), determines that the sampling and analytical techniques are inappropriate for the pollutant in question, sampling and analysis shall be performed by using analytical methods or any other applicable sampling and analytical procedures, including procedures suggested by the City of Tampa or other parties, for which method validation information has been submitted and approved by the FDEP in accordance with Rules 62-160.430, 62- 160.520 and 62-160.530, F.A.C.
- 3. Bis(2-ethylhexyl) phthalate, Carbazole, o-Cresol, p-Cresol, n-Decane, Fluoranthene, n-Octadecane, and 2,4,6-Trichlorophenol shall be analyzed in accordance with EPA Methods 625 or 8270D.
- 4. Purgeable Organics shall be analyzed in accordance with EPA Method 624.

SECTION 2 - REPORTING REQUIREMENTS

A. Monitoring Reports

- 1. Analytical monitoring results obtained shall be summarized and reported as follows:
 - a. Monitoring reports shall be submitted within 30 days of receiving the analytical data. The report shall include:
 - copies of the analytical results and the sample chain of custody form, and
 - a signed cover sheet with the certification statement established in PART 4 SECTION 5 (C) of this permit.
- B. Pursuant to the reporting requirements of 62-625.600(6)(e) F.A.C., the results of all monitoring performed more frequently than required by this permit, using test procedures approved under PART 2 SECTION 1 (B), shall be submitted with the report.

Page 5 of 25

Industry Name_____ Universal Environmental Solutions, LLC

Permit No. 1112_

- C. When a self-monitoring report shows any violation of the applicable standards included in PART 1 of this permit, the permittee <u>must</u> resample and submit both results within thirty (30) days of receiving original sample results, except the permittee is not required to resample if:
 - (1) The City of Tampa performs sampling at the permittee at a frequency of at least once per month, or
 - (2) The City of Tampa performs sampling at the permittee between the time when the permittee performs its initial sampling and the time when the permittee receives the results of this sampling.
- D. The permittee <u>must</u> notify the City of Tampa, Wastewater Department, Industrial Waste Section by telephone, within twenty-four (24) hours of receipt of monitoring results, if the results indicate any violation of applicable standards. The current telephone number at date of issuance of this permit is (813) 247-3451.

It shall be the permittee's responsibility to ensure that it has updated contact information for the City of Tampa, Wastewater Department, Industrial Waste Section in order to provide all required verbal and written notices as required under this permit.

- E. Signatory requirements are established in Part 4 Section 5 (C) of this permit.
- F. Reports of Potential Problems
 - 1. In the case of any discharge, including but not limited to, accidental discharges, discharges of a non-routine, episodic nature, a non-customary batch discharge, or a slug load, that may cause potential problems for the POTW, the user shall immediately telephone (currently 813-247-3451 at date of issuance of this permit, or as changed) and notify the City of Tampa, Wastewater Department, Industrial Waste Section of the incident. This notification shall include the location of discharge, type of waste, concentration and volume, if known, and corrective actions taken by the user.
 - 2. Within five (5) days following such discharge, the user shall, unless waived by the Director, submit a detailed written report describing the cause(s) of the discharge and measures to be taken by the user to prevent similar future occurrences. Such notification shall not relieve the user of any expense, loss, damage, or other liability which may be incurred as a result of damage to the POTW, natural resources, or any other damage to person or property; nor shall such notification relieve the user of any fines, penalties, or other liability which may be imposed pursuant to the regulations and standards contained in Chapter 26, City of Tampa code.
 - 3. A notice shall be permanently posted on the user's bulletin board, or other prominent place, advising employees or its agents who to call in the event of a discharge described in Section 2(F)(1), above. Users shall insure that all employees and/or agents who may cause or suffer such a dangerous discharge to occur are advised of the emergency notification procedure.

Page 6 of 25

Industry Name Universal Environmental Solutions, LLC

Permit No. 1112

4. <u>All</u> written reports required of this permit shall be submitted to:

City of Tampa Industrial Waste Section 2700 Maritime Blvd. Tampa, FL 33605.

PART 3 - SPECIAL CONDITIONS / COMPLIANCE SCHEDULES

- 1. Universal Environmental Services is permitted to discharge fully treated bilge water and tank wash water removed from ships that are berthed only within the City of Tampa service area. The service area includes Port Tampa, Port of Tampa, and Port Sutton. Port Manatee is not in the service area.
- 2. It is permissible to treat and discharge water collected during an oil spill emergency remediation within Tampa Bay.
- 3. The discharge of any treated or untreated land based fuel storage vessel bottom waters or washings, gasoline contaminated water, or hydrocarbon solvent contaminated water, groundwater, or stormwater is strictly prohibited, unless expressly authorized by the Department.
- 4. It shall be the goal of the permittee to avoid discharging wastewater having a concentration of Total Dissolved Solids exceeding 20,000 mg/l by blending different sources of wastewater or by other means. The concentration of Total Dissolved Solids in any wastewater discharged by the permittee over and above an initial 50,000 gallons per day shall not exceed 7,500 mg/l.
- 5. Compulsory daily wastewater discharge flow limits may be imposed based on the facility's pollutant loading and the potential impact on the treatment works.
- 6. The City of Tampa, at its discretion, may collect split samples of wastewater.
- 7. Initial Certification Statement

Within sixty (60) days after the issuance of this permit, the permittee shall submit a written statement to the City of Tampa, Industrial Waste Section, that is signed by an authorized representative of the company. The statement must:

a. List and describe the subcategories of wastes accepted for treatment at the facility;

b. List and describe the treatment systems in-place at the facility and conditions under which the treatment

Page 7 of 25

Industry Name	Universal Environmental Solutions, LLC	Permit No. 1112_

systems are operated for the subcategories of wastes accepted for treatment at the facility;

c. Include information and supporting data establishing that these treatment systems will achieve equivalent treatment.

8. Periodic Certification Statement

During the effective period of this permit, the permittee shall submit a written statement to the City of Tampa, Industrial Waste Section, in the month of December, which certifies that the facility is operating its treatment systems to provide equivalent treatment as set forth in the initial certification. In the event that the facility has modified its treatment systems, the facility should submit a description of the modified systems and information and supporting data to establish that the modified system will achieve equivalent treatment. The periodic certification statement must be signed by an authorized representative of the company.

9. On-site Compliance Paperwork

On-site compliance paperwork means data or information retained in the office of the permittee which supports the initial and periodic certifications statements. This paperwork must:

- a. List and describe the subcategory wastes being accepted for treatment at the facility;
- List and describe the treatment systems in-place at the facility, modifications to the treatment systems and the conditions under which the systems are operated for the subcategories of wastes accepted for treatment at the facility;
- c. Provide information and supporting data establishing that these treatment systems will achieve equivalent treatment;
- d. Describe the procedures it follows to ensure that its treatment systems are well-operated and maintained; and
- e. Explain why the procedures it has adopted will ensure its treatment systems are well-operated and maintained.

The permittee will maintain at the office of the permittee and make available for inspection the on-site compliance paperwork.

Page 8 of 25

Industry Name Universal Environmental Solutions, LLC

Permit No. 1112

PART 4 - STANDARD CONDITIONS

SECTION 1 - ABBREVIATIONS

AWTP	Advanced Wastewater Treatment Plant
CFR	Code of Federal Regulations
EPA	U.S. Environmental Protection Agency
F.A.C.	Florida Administrative Code
FDEP	Florida Department of Environmental Protection
RCRA	Resource Conservation and Recovery Act

SECTION 2 - DEFINITIONS

A. Authorized Representative or Duly Authorized Representative of the User or Industrial User - shall mean:

- 1. If the user is a corporation, the responsible corporate officer means:
 - a. The president, secretary, treasurer or vice-president of a corporation in charge of a principal business function, or any other person who performs similar policy or decision-making functions for the corporation; or
 - b. The manager of one or more manufacturing, production, or operating facilities provided the manager;

1. Is authorized to make management decisions which govern the operation of the regulated facility, including having the explicit or implicit duty of making capital investment recommendations;

2. Is authorized to initiate and direct other comprehensive measures to assure long-term environmental compliance with environmental laws and regulations;

3. Can ensure that the necessary systems are established or actions taken to gather complete and accurate information for individual wastewater discharge permit requirements, and/or other control mechanism requirements as set forth in Rule 62-625.500(2)(a)2 F.A.C.;

4. Has been assigned or delegated the authority to sign documents in accordance with corporate procedures.

- 2. The user or a general user is a partnership or sole proprietorship; a general partner or sole proprietor, respectively.
- 3. The user is a federal, state, or local government facility; a director or highest official appointed or designated to oversee the operation and performance of the activities of the government facility, or their designee.

Page 9 of 25

Industry Name Universal Environmental Solutions, LLC

Permit No. 1112

- 4. The individuals described in paragraphs one (1) through three (3) above, may designate a duly authorized representative, if the authorization is in writing, the authorization specifies the individual or position responsible for the overall operation of the facility from which the discharge originates or having overall responsibility for environmental matters for the company, and the written authorization is submitted to the City of Tampa.
- B. Composite Sample shall mean a sample collected over time, formed either by continuous sampling or by mixing discrete samples.
- C. Daily Maximum Limits shall mean the maximum allowable discharge limit of a pollutant during a calendar day. Where Daily Maximum Limits are expressed in units of mass, the daily discharge is the total mass discharged over the course of the day. Where Daily Maximum Limits are expressed in terms of a concentration, the daily discharge is the arithmetic average measurement of the pollutant concentration derived from all measurements taken that day.
- D. Grab Sample shall mean a single "dip and take" sample collected at a representative point in the discharge system.
- E. Monthly Average shall mean the average results of all sampling, either grab samples or 24-hour composite samples, taken during a calendar month
- F. Official shall mean the Wastewater Department Director and/or his or her designee.
- G. Publicly Owned Treatment Works (POTW) shall mean the following:
 - 1. The treatment works (as defined by Section 212 of the Clean Water Act ("Act") which is owned by a state or municipality (as defined by Section 502(4) of the Clean Water Act ("Act"); and
 - 2. A facility which discharges wastes into waters of the state, or which can reasonably be expected to be a source of water pollution and includes any or all of the following: the collection and transmission system, the wastewater treatment works, the reuse or disposal system, and the residuals management facility; and
 - 3. Includes any devices and systems used in the storage, treatment, recycling and reclamation of municipal sewage or industrial wastes of a liquid nature; and
 - 4. Includes sewers, pipes and other conveyance only if they convey wastewater to the POTW treatment plant. POTW as used in this permit references the City of Tampa's Treatment Works.
- H. Slug shall mean any discharge of water or wastewater in which the concentration of any given pollutant or the rate of flow exceeds more than five (5) times the allowable discharge limit of concentration or average of flow during a normal working day (i.e., one, two or three-shift operation) and continues for a period of more than fifteen (15) minutes, or the discharge of any pollutant, including oxygen-demanding pollutants (BOD, etc.),

Page 10 of 25

Industry Name_____Universal Environmental Solutions, LLC Permit No._____1112____

released in a discharge at a flow rate and/or pollutant concentration which will cause interference with the treatment works.

- I. <u>Technical Manual/Technical Standards</u> shall mean that the Official may establish technical standards setting forth administrative guidelines governing enforcement of the City of Tampa Code Chapter 26, "Utilities Ordinance," Article I ("Administrative Provisions"), Article III ("Wastewater Department Ordinance"), and Article VII ("Grease Management Ordinance") and any other information needed for the uniform and orderly administration of the above described City of Tampa Code provisions. The Official may also establish requirements not specifically addressed in the above described City of Tampa Code provisions, but necessary to their effective enforcement. The Official and/or City may also be required to establish requirements for enforcement under applicable federal or state law, rules, and/or regulations, and/or as a condition of the City's NPDES Permit. Such standards are to be published in the "City of Tampa's Wastewater Discharge and Industrial Pretreatment Standards Technical Manual," and as amended, which shall be on file in the office of the City Clerk at least seven (7) days prior to adoption thereof and shall be made available to the public for inspection and for duplication at cost. The "City of Tampa's Wastewater Discharge and Industrial Pretreatment Standards. The "City of Tampa's Wastewater Discharge and Industrial Pretreatment at cost. The "City of Tampa's Wastewater Discharge and Industrial Pretreatment Standards. The "City of Tampa's Wastewater Discharge and Industrial Pretreatment at cost. The "City of Tampa's Wastewater Discharge and Industrial Pretreatment Standards." and as amended, adopted by reference, shall have the force and effect of law as a municipal ordinance, subject to the requirements of federal or state law, rules, and/or regulations.
- J. <u>Upset</u> shall mean an exceptional incident in which there is unintentional and temporary noncompliance with categorical pretreatment standards because of factors beyond reasonable control of the industrial user.
- K. <u>User</u> means any person who directly or indirectly discharges, causes, or permits the discharge of wastewater into the POTW.

SECTION 3 - GENERAL CONDITIONS

A. Duty to Comply

The permittee must comply with all conditions of this permit, Chapter 26 of the City of Tampa Code, the Technical Manual, and all applicable Federal, State, or local laws, rules, and regulations in effect at the time of issuance of this permit, and that may become effective during the term of this permit.

Any violation of the terms and conditions of this permit shall be deemed a violation of the Technical Manual and subjects the permittee, or any other person, to the sanctions set forth in Sections 10 and 11 of the Technical Manual and/or as set forth in Part 4 Sections 7, 8, and 9 of this permit.

Failure to comply with the terms and conditions of this permit, Chapter 26 of the City of Tampa Code, the Technical Manual, and all applicable Federal, State, and/or local laws, rules and regulations may subject the permittee to administrative or judicial enforcement remedies. Administrative enforcement remedies include, but are not limited to, the suspension, modification and/or revocation of this permit. Judicial enforcement remedies include, but are not limited to, civil or criminal penalties, injunctive relief, and/or other legal remedies and relief as provided by law. These remedies are not exclusive and any, all, or any combination of these actions may be

Page 11 of 25

Industry Name Universal Environmental Solutions, LLC

Permit No. 1112

taken against a noncompliant permittee or against any other person when circumstances warrant by the City of Tampa. See Sections 10 and 11 of the Technical Manual.

B. Duty to Mitigate

The permittee shall take all reasonable steps to minimize or correct any adverse impact on the environment, public health, worker health and safety, and POTW resulting from noncompliance with this permit, including such accelerated or additional monitoring as necessary to determine the nature and impact of the non-complying discharge.

C. Wastewater Discharge Permit Modification

The Director may modify a wastewater discharge permit for the good cause including, but not limited to, the following reasons .:

- 1. To incorporate any new or revised federal, state, or local pretreatment standards or requirements;
- 2. To address significant alterations or additions to the user's operation, processes, or wastewater volume or character since the time of wastewater discharge permit issuance;
- 3. A change in the POTW that requires either a temporary or permanent reduction or elimination of the authorized discharge;
- 4. Information indicating that the permitted discharge poses a threat to the City's POTW, City personnel, or the receiving waters;
- 5. Violation of any terms or conditions of the wastewater discharge permit;
- 6. Misrepresentation or failure to fully disclose all relevant facts in the wastewater discharge permit application or in any required reporting;
- 7. Revision of or a grant of variance from categorical pretreatment standards pursuant to 40 CFR 403.13; Rule 62-625.700 F.A.C.;
- 8. To correct typographical or other errors in the wastewater discharge permit; or
- 9. To reflect a transfer of the facility ownership or operation to a new owner or operator.
- D. Wastewater Discharge Permit Transfer

Wastewater discharge permits may be transferred to a new owner or operator only if the permittee gives at least thirty (30) days advance notice to the Director, and the Director approves the wastewater discharge permit Page 12 of 25

Industry Name Universal Environmental Solutions, LLC Permit No. 1112

transfer. The notice to the Director must include a written certification by the new owner or operator which:

- States that the new owner and/or operator have no immediate intent to change the facility's operations and processes;
- 2. Identifies the specific date on which the transfer is to occur; and
- 3. Acknowledges full responsibility for complying with the existing wastewater discharge permit.

Failure to provide advance notice of a transfer renders the wastewater discharge permit void as of the date of facility transfer.

E. Wastewater Discharge Permit Revocation

The director may revoke a wastewater discharge permit for good cause, including, but not limited to, the following reasons:

- 1. Failure to notify the Director of significant changes to the wastewater prior to the changed discharge;
- 2. Failure to provide prior notification to the Director of changed conditions pursuant to Part 4 Section 6 of this permit;
- 3. Misrepresentation or failure to fully disclose all relevant facts in the wastewater discharge permit application and/or any reports required under this ordinance;
- 4. Falsifying self-monitoring reports;
- 5. Tampering with monitoring equipment;
- 6. Refusing to allow the Director timely access to the facility premises and records;
- 7. Failure to meet effluent limitations;
- 8. Failure to pay fines;
- 9. Failure to pay sewer charges;
- 10. Failure to meet compliance schedules;
- 11. Failure to complete a wastewater survey or the wastewater discharge permit application;

12. Failure to provide advance notice of the transfer of business ownership of a permitted facility; Page 13 of 25

Industry Name	Universal Environmental Solutions, LLC	Permit No1112
Industry Name	Universal Environmental Berations, DBe	

- 13. Violation of any pretreatment standard or requirement, or any terms of the wastewater discharge permit or Chapter 26, City of Tampa Code; or
- 14. Material or substantial alterations or additions to the discharger's operation that adversely impact the wastewater discharge and which were not in existence as of the date of the issued permit.

Wastewater discharge permits shall be voidable upon cessation of operations or transfer of business ownership. All wastewater discharge permits issued to a particular user are void upon the issuance of a new wastewater discharge permit to that user.

F. Wastewater Discharge Permit Reissuance

A user with an expiring wastewater discharge permit shall apply for wastewater discharge permit re-issuance by submitting a complete permit application, in accordance with Section 4 of the Technical Manual, a minimum of ninety (90) days prior to the expiration of the user's existing wastewater discharge permit.

G. Property Rights

The issuance of this permit does not convey any property rights of any sort, or any exclusive privileges, nor does it authorize any injury to private property or any invasion of personal rights, nor any infringement of Federal, State, and/or local laws, rules, or regulations.

H. Dilution

No user shall ever increase the use of process water, or in any way attempt to dilute a discharge, as a partial or complete substitute for adequate treatment to achieve compliance with a discharge limitation unless expressly authorized by an applicable pretreatment standard or requirement. The Director may impose mass limitations on users who are using dilution to meet applicable pretreatment standards or requirements; or in other cases when the imposition of mass limitations is appropriate.

- I. Notification of the Discharge of Hazardous Waste
 - 1. Any industrial user who discharges hazardous waste shall notify the director, the POTW Wastewater Treatment Plant Manager, the EPA Regional Waste Management Division Director, and FDEP's hazardous waste and pretreatment authorities, in writing, of any discharge into the POTW of a substance which, if otherwise disposed of, would be a hazardous waste under 40 CFR Part 261 and/or Chapter 62-730, F.A.C. Such notifications must include the name of the hazardous waste as set forth in 40 CFR Part 261, and/or Chapter 62-730, F.A.C., the EPA hazardous waste number, and the type of discharge (continuous, batch, or other). If the industrial user discharges more than one hundred (100) kilograms of such waste per calendar month to the POTW, the notification shall also contain the following information to the extent such information is known and readily available to the industrial user:

Page 14 of 25

Industry Name_____ Universal Environmental Solutions, LLC Permit No._____ 1112

- a. An identification of the hazardous constituents contained in the wastes;
- b. An estimation of the mass and concentration of such constituents in the waste stream discharged during that calendar month; and
- c. An estimation of the mass of constituents in the waste stream expected to be discharged during the following twelve (12) months.

All industrial users shall provide the notification no later than one hundred eighty (180) days after the discharge of the listed or characteristic hazardous waste. Any notification under this paragraph needs to be submitted only once for each hazardous waste discharged. However, notifications of changed conditions of each of the hazardous waste discharges must be submitted under 40 CFR 403.12(j) and Section 6.5 of the Technical Manual. The notification requirement in this paragraph does not apply to pollutants already reported by users subject to categorical pretreatment standards under the self-monitoring requirements of 40 CFR 403.12(b), (d), and (e), and Sections 6.1, 6.3, and 6.4 of the Technical Manual.

- 2. Dischargers are exempt from the requirements of 40 CFR 403.12(p)(1) and paragraph 1., above, during a calendar month in which they discharge no more than fifteen (15) kilograms of hazardous wastes, unless the wastes are acute hazardous wastes as specified in 40 CFR 261.30(d) and 261.33(e) and/or Chapter 62-730, F.A.C. Discharge of more than fifteen (15) kilograms of non-acute hazardous wastes in a calendar month, or any quantity of acute hazardous wastes as specified in 40 CFR 261.30 (d) and 261.33(e) and/or Chapter 62-730 F.A.C., requires a one (1) time notification. Subsequent months during which the industrial user discharges more than such quantities of any hazardous waste do not require additional notification.
- 3. In the case of any new FDEP and/or EPA regulations under Section 3001 of RCRA identifying additional characteristics of hazardous waste or listing any substance as a hazardous waste, the industrial user must notify the Director, the POTW Wastewater Treatment Plant Manager, the EPA Regional Waste Management Division director, and FDEP's hazardous waste and pretreatment authorities of the discharge of such substance within ninety (90) days of the effective date of such regulations.
- 4. In the case of any notification made under this Section, the industrial user shall certify that it has a program in place to reduce the volume and toxicity of hazardous wastes generated to the degree it has determined to be economically practical.
- 5. This provision does not create a right to discharge any substance not otherwise permitted to be discharged by this ordinance, a permit issued thereunder, or any applicable federal or state law,
- J. Personnel Safety

The permittee shall provide safe inspection conditions for City of Tampa, and/or any State or Federal pretreatment program personnel, agents, and /or their designated representatives and shall provide such personnel with all necessary safety information regarding the facility's safety policy pertaining to required Page 15 of 25

Industry Name Universal Environmental Solutions, LLC

Permit No. 1112____

personal safety gear.

SECTION 4 - OPERATIONS AND MAINTENANCE OF POLLUTION CONTROLS

A. Pretreatment Facilities

The permittee shall provide wastewater treatment as necessary to comply with the conditions in this permit and the standards expressed in Chapter 26, City of Tampa Code, and shall achieve compliance with all categorical pretreatment standards, local limits, and the prohibitions set out in Section 2 of the Technical Manual within the time limitations specified by the EPA, the state of Florida, or the Director, whichever is more stringent. Any facilities necessary for compliance shall be provided, operated, and maintained at the user's expense. Detailed plans describing such facilities and operating procedures shall be submitted to the Director for review, and shall be acceptable to the Director before such facilities are constructed. The review of such plans and operating procedures shall in no way relieve the user from the responsibility of modifying such facilities as necessary to produce a discharge acceptable to the City under provisions of this ordinance.

B. Duty to Halt or Reduce Activity

Upon reduction, loss or failure of the pretreatment facility, the permittee shall, to the extent necessary to maintain compliance with its permit, control production or all discharges or both until operation of the pretreatment facility is restored. It shall not be a defense for a permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit.

C. Bypass of Treatment Facilities

- 1. For the purposes of this Section,
 - a. "Bypass" means the intentional diversion of waste streams from any portion of a user's treatment facility.
 - b. "Severe property damage" means substantial physical damage to property, damage to the treatment facilities which causes them to become inoperable, or substantial and permanent loss of natural resources which can reasonably be expected to occur in the absence of a bypass. Severe property damage does not mean economic loss caused by delays in production.
- 2. A user may allow any bypass to occur which does not cause pretreatment standards or requirements to be violated, but only if it also is for essential maintenance to assure efficient operation. These bypasses are not subject to the provisions of paragraphs 3, 4, 5, and 6 of this Section.
- If a user knows in advance of the need for a bypass, it shall submit prior notice to the Director, at least ten (10) days before the date of the bypass, if possible.

Page 16 of 25

Industry Name Universal Environmental Solutions, LLC

Permit No. 1112

- 4. A user shall submit oral notice to the Director of an unanticipated bypass that exceeds applicable pretreatment standards within twenty-four (24) hours from the time it becomes aware of the bypass. A written submission shall also be provided within five (5) days of the time the user becomes aware of the bypass. The written submission shall contain a description of the bypass and its cause; the duration of the bypass, including exact dates and times, and, if the bypass has not been corrected, the anticipated time it is expected to continue; and steps taken or planned to reduce, eliminate, and prevent reoccurrence of this bypass. The Director may waive the written report on a case-by-case basis if the oral report has been received within twenty-four (24) hours.
- 5. Bypass is prohibited, and the Director may take an enforcement action against a user for bypass, unless:
 - a. Bypass was unavoidable to prevent loss of life, personal injury, or severe property damage;
 - b. There were no feasible alternatives to the bypass, such as the use of auxiliary treatment facilities, retention of untreated wastes, or maintenance during normal periods of equipment downtime. This condition is not satisfied if adequate back-up equipment should have been installed in the exercise of reasonable engineering judgment to prevent a bypass which occurred during normal periods of equipment downtime or preventive maintenance; and
 - c. The user submitted notices as required under paragraphs 3 and 4 of this Section.
- 6. The Director may approve an anticipated bypass, after considering its adverse effects, if the Director determines that it will meet the three conditions listed in paragraph 5 of this Section.
- D. Removed Substances

Solids, sludges, filter backwash, or other pollutants removed in the course of treatment or control of wastewaters shall be disposed of in accordance with section 405 of the Clean Water Act and Subtitles C and D of the Resource Conservation and Recovery Act.

SECTION 5 - MONITORING AND RECORDS

A. Right of Entry: Inspection and Sampling

The Director shall have the right to enter the premises of any user to determine whether the user is complying with all requirements of this ordinance, and any wastewater discharge permit or order issued hereunder. Users shall allow the Director ready access to all parts of the premises for the purposes of inspection, sampling, records examination and copying, and the performance of any additional duties.

 Where a user has security measures in force which require proper identification and clearance before entry into its premises, the user shall make necessary arrangements with its security guards so that, upon presentation of suitable identification, the Director will be permitted to enter without delay for the purposes

Page 17 of 25

Industry Name	Universal Environmental Solutions, LLC	Permit No. 1112_
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of performing specific responsibilities.

- 2. The Director shall have the right to set up on the user's property, or require installation of, such devices as are necessary to conduct sampling and/or metering of the user's operations.
- 3. The Director may require the user to install monitoring equipment as necessary. The facility's sampling and monitoring equipment shall be maintained at all times in a safe and proper operating condition by the user at its own expense. All devises used to measure wastewater flow and quality shall be calibrated regularly to ensure their accuracy.
- 4. Any temporary or permanent obstruction, to safe and easy access to the facility to be inspected and/or sampled, shall be promptly removed by the user at the written or verbal request of the Director and shall not be replaced. The costs of clearing such access shall be borne by the user.
- Unreasonable delays in allowing the Director access to the user's premises shall be a violation of this ordinance.
- 6. While performing the necessary work on private properties referred to in this Section, the Director and duly authorized employees of the Department shall observe all applicable safety rules. The user shall provide safe inspection conditions for the Director, and shall provide all necessary safety information regarding the facility's safety policy pertaining to required personal safety gear.
- User shall pay for the reasonable costs incurred by the Director related to the inspections and monitoring of wastewater discharge at user's facility.

B. Record Keeping Requirements

 Users or Industrial Users subject to the reporting requirements of this ordinance shall retain, and make available for inspection and copying, all records of information obtained pursuant to any monitoring activities required by this ordinance, and any additional records of information obtained pursuant to monitoring activities undertaken by the user or industrial user independent of such requirements, and including documentation associated with Best Management Practices established under Section 2.3 E of the Technical Manual.

Records shall include for all samples:

- a. The date, exact place, method, time of sampling, and the name of the person(s) taking the samples;
- b. The dates analyses were performed;
- c. Who performed the analyses;
- d. The analytical techniques or methods used
- e. The results of such analyses; and
- f. Proper chain of custody documentation.

Page 18 of 25

Industry Name Universal Environmental Solutions, LLC Permit No. 1112

2. These records shall remain available for a period of at least three (3) years. This period shall be automatically extended for the duration of any unresolved litigation concerning the user or industrial user and/or the City, or where the user or industrial user has been specifically notified of a longer retention period by the Director.

C. Signatory Requirements and Certification Statements

All applications, permits, reports or information required to be submitted to the Director and/or the City under this ordinance shall be signed and certified as set forth below:

- 1. Certification of Permit Applications, and/or User or Industrial User Reports.
 - a. The certification statement described below in paragraph 1.b is required to be signed and submitted by the person making the request, who is submitting the following documents:
 - i. Permit applications in accordance with Sections 3.6 and 4.5 of the Technical Manual;
 - ii. Users or industrial users submitting baseline monitoring reports in accordance with Section 6.1 of the Technical Manual;
 - iii. Users or industrial users submitting reports on compliance with the categorical pretreatment standard deadlines in accordance with Section 6.3 of the Technical Manual; and
 - iv. Users or industrial users submitting periodic compliance reports in accordance with Section 6 of the Technical Manual.
 - b. The following certification statement must be signed on the above described documents by an authorized representative defined in Part 4 Section 2 above:

"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 gather and evaluate 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 for knowing violations."

2. Changes of Authorized Representative Designation. If the designation of the authorized representative changes and/or is no longer accurate because a different individual or position has responsibility for the overall operation of the facility or overall responsibility for environmental matters for the company, the new Authorized Representative is required to submit to the Director within thirty (30) days of this change the following documents:

Page 19 of 25

Industry Name_____Universal Environmental Solutions, LLC Permit No.__1112____

- a. A new written authorization satisfying the requirements of the above Part 4 Section 2's definition of "Authorized Representative or Duly Authorized Representative of the User or Industrial User;" and
- b. New signatures and certification statements are required for all of the above described documents and as otherwise required by this ordinance.
- c. New signatures and certification statements are required to be submitted to the Director and/or City on all documents required to be signed and/or certified under this ordinance.

SECTION 6 - ADDITIONAL REPORTING REQUIREMENTS

A. Accidental Discharge / Slug Control Plans

At least once every two (2) years, the Director shall evaluate whether each significant industrial user needs an accidental discharge/slug control plan. The Director may require any user to develop, submit for approval, and implement such a plan. Alternatively, the Director may develop such a plan for any user. An accidental discharge/slug control plan shall address, at a minimum, the following:

- 1. Description of discharge practices, including non-routine batch discharges;
- 2. Description of stored chemicals;
- Procedures for immediately notifying the Director of any accidental or slug discharge, as required by Part 2 Section 2(F) of this permit; and
- 4. Procedures to prevent adverse impact from any accidental or slug discharge. Such procedures include, but are not limited to, inspection and maintenance of storage areas, handling and transfer of materials, loading and unloading operations, control of plant site runoff, worker training, building of containment structures or equipment, measures for containing toxic organic pollutants, including solvents, and/or measures and equipment for emergency response.
- B. Reports of Changed Conditions

Each user must notify the Director of any planned significant changes to the user's operations or system which might alter the nature, quality, or volume of its wastewater at least ninety (90) days before the change.

- 1. The Director may require the user to submit such information as may be deemed necessary to evaluate the changed condition, including the submission of a wastewater discharge permit application under Section 4.5 of the Technical Manual.
- 2. The Director may issue a wastewater discharge permit under Section 4.7 of the Technical Manual, or modify

Page 20 of 25

Industry Name Universal Environmental Solutions, LLC	Permit No.	1112
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an existing wastewater discharge permit under Section 5.4 of the Technical Manual, in response to changed conditions or anticipated changed conditions.

- 3. For purposes of this requirement significant changes include, but are not limited to, flow increases of twenty percent (20%) or greater, and the discharge of any previously unreported pollutants.
- C. Duty to Provide Information

The permittee shall furnish to the City of Tampa, within a reasonable time, at a frequency determined by the Wastewater Director, any information which the City of Tampa may request to determine whether cause exists for modifying, revoking and reissuing, or terminating this permit, or to determine compliance with this permit. The permittee shall also furnish to the City of Tampa upon request, copies of records required to be kept by this permit.

SECTION 7 - ADMINISTRATIVE ENFORCEMENT REMEDIES

A. <u>Remedies for Violations</u>

The permittee, violating any of the provisions of this permit, is subject to the Administrative Enforcement Remedies pursuant to Chapter 26 of the City of Tampa Code and the Technical Manual.

SECTION 8 - JUDICIAL ENFORCEMENT REMEDIES

A. Civil and Criminal Liability

In addition to other remedies for enforcement provided herein, the Director, through the City Attorney, may petition Hillsborough County, the state of Florida, the United States Department of Justice, or any other tribunal as appropriate, to exercise such methods or remedies as shall be available to such government entities to seek criminal or civil penalties, injunctive relief, or such other remedies as may be provided by applicable county, state or federal laws to ensure compliance by industrial users of applicable pretreatment standards, to prevent the introduction of toxic pollutants or other regulated pollutants into the POTW, or to prevent such other water pollution as may be regulated by county, state or federal law.

SECTION 9 - PENALTIES

A. Penalties for Violations

Any user who is found to have violated any provision of the pretreatment standards, requirements, or conditions set forth in a wastewater discharge permit issued hereunder, or the Department's pretreatment orders, rules or regulations, and/or any pretreatment standard or requirement, shall be, upon conviction, subject to penalties pursuant to Chapter 26 of the City of Tampa Code, and the Technical Manual. Each separate violation shall constitute a separate offense and upon conviction of a specified ordinance violation, each day of violation shall

Page 21 of 25

Industry Name_____Universal Environmental Solutions, LLC_____

Permit No. 1112_

constitute a separate violation.

SECTION 10 - MISCELLANEOUS PROVISIONS

A. Severability

The provisions of this permit are severable, and if any provision of this permit, or the application of any provision of this permit to any circumstance, is held invalid, the application of such provision to other circumstances, and the remainder of this permit, shall not be affected thereby.

Page 22 of 25

Industry Name____Universal Environmental Solutions, LLC

Permit No. 1112

Acceptance of Permit

Universal Environmental Solutions, LLC accepts the conditions of the (name of company)

permit and agrees to meet the conditions herein.

Permit period: March 1, 2014 through February 28, 2016

 $\frac{1}{(\text{signature})} \frac{1}{(\text{date})} \frac{1}{(\text{date})} \frac{1}{(\text{date})}$ By *Name Ed Kinley

Title_____President

* Must be the owner or an authorized representative of the company.

Page 24 of 25

Industry Name Universal Environmental Solutions, LLC

Permit No. 1112

Acceptance of Permit

Universal Environmental Solutions, LLC accepts the conditions of the (name of company)

permit and agrees to meet the conditions herein.

Permit period: March 1, 2014 through February 28, 2016

By E.	KIL	03/05/14
	(signature)	(date)
*Name	Ed Kinley	

Title_____ President

* Must be the owner or an authorized representative of the company.

(Return this signed page to the Industrial Waste Division)

Page 25 of 25

ATTACHMENT 5 – SLUDGE, RESIDUE and BYPRODUCT MANAGEMENT DESCRIPTION

Revision 3 Attachment 5 Modifications - No text changes have been added to this attachment. The page numbers, revision number and dates have been updated. Rev 4 No changes.

5.0 SLUDGE, RESIDUE AND BYPRODUCT MANAGEMENT DESCRIPTION

This document is a brief description of the management of the sludge waste created by the oily water processing activities. Sludge, residue and byproducts solid wastes requiring processing are created by settling in the primary filtration tanks described in Attachment 2 of this permit or created during the primary DAF system wash down process. This facility does not accept sludge wastes as determined in Attachment 5 in this permit submission.

Sludge collected at the bottom of the flow through tanks are periodically removed from the bottom of the tanks using a dual-diagram pump. The waste sludge is transferred to an onsite roll-off detailed as **Figure 1.3.1** of the permit submission.

When the roll-off has reached 2/3 capacity a waste characterization sample is collected using the protocols detailed in the Attached Waste and Sampling Plan. The sludge contained within the box is characterized and disposed utilizing a certified hauler and approved waste landfill.

The attached sludge roll off laboratory analysis is the plant's baseline analytical. Prior to sludge disposal or semi-annually until disposal the sludge waste will be sampled and analyzed for the waste parameters, as required under 40 CFR, Parts 279.10(e) and 279.59. Sludge sampling will follows procedure detailed in **Attachment 4** Waste Analyses and Sampling Plan.

A copy of the baseline sludge analytical results is attached under Section 6.3 of this submission. No indication hazardous waste was found per FAC 62-730.030 and 40 CFR 261 was found in the sludge analytical results.

ATTACHMENT 6 – TRACKING PLAN

Revision 3 Attachment 6 Modifications - No text changes have been added to this attachment. The page numbers, revision number and dates have been updated. Rev 4 No changes.

6.0 WASTE TRACKING PLAN

The UES facility uses standardized forms for the tracking of materials into and out of the processing plant. The processing plant operator utilizes the Acceptable Knowledge approach as a primary indicator of hazardous wastes and testing as a secondary approach all wastes prior to processing plant entry. A waste profile approval form is required from the generator prior to acceptance of the delivery of non-hazardous wastes from non-UES facility or deliveries that are from sources that have not been identified. A uniform non-hazardous waste manifest is used to track these non-UES outside sources prior to entry into the plant. The USE plant operator signature is required on the uniform non-hazardous waste manifest before wastes enter the processing plant. Non-hazardous waste from UES personnel are profiled using the attached UES Waste Profile and processed using the attached uniform non-hazardous waste manifest. A copy of the forms are detailed in the sections included in this attachment as well as a copy of the baseline sludge profile analytical data.

6.1 UES Standard Operating Procedures for Hazardous Waste Assessment of Used Oils Prior to Pickup

<u>6.1.1 What are halogens?</u> - Halogens are any compound containing chlorine, bromine, fluorine and iodine. The following wastes are often mixed with used oil and may be contaminated with halogenated organic product.

- Brake fluids
- Degreasers including petroleum distillates and mineral spirits
- Refrigerants (e.g., Freon)
- Paints
- Oil-based inks
- Antifreeze
- Carburetor cleaners

<u>6.1.2 When is Used Oil considered a hazardous waste? -</u> There are two primary approaches for determining whether the used oil is a hazardous waste.

• First Approach – Acceptable Knowledge (40 CFR 261.11 (c))

Process knowledge includes detailed information about the waste obtained from published or documented waste analysis data or studies conducted on wastes generated by processes similar to that which generated the waste in question.

• Second Approach – Testing (40 CFR 261.11 (c) and 40 CFR 761) Along with Acceptable Knowledge

Testing of the following four (4) hazardous waste characteristics are used to determine whether a used oil is a hazardous waste (Acceptable process knowledge can be substituted for one (1) or more the tests for the four (4) hazardous waste characteristics).

- o Corrosivity
- o Ignitability
- o Reactivity
- o **Toxicity**

1. Corrosivity – pH

An oil with a pH of less than or equal to 2 or greater than or equal to 12.5 are considered corrosive and hazardous and should not be picked up.

2. Ignitability – Flash Point Determination

An oil with a Flash Point below 140°F (60°C) are considered hazardous and should not be picked up. The Flash Point is the lowest temp at which vapors above a waste ignite when exposed to a flame.

3. Reactivity – Liquid Reacts Violently or Explodes

Other than the generator's knowledge, Oil is considered hazardous if any of the following characteristics are observed.

- Unstable and readily undergoes violent change without detonating
- Reacts violently or forms potentially explosive mixtures with water
- Releases toxic gases when mixed with water
- Is a cyanide or sulfide bearing waste that releases toxic gases when exposed to pH conditions between 2 and 12.5

4. Toxicity - Based on the Potential to Contaminate Groundwater

Oil is considered hazardous if it contains one (1) or more chemicals present out of a list of forty (40) chemicals at a concentration exceeding its Toxicity Characteristic Leaching Procedure (TCLP) concentration (see attached table). The purpose of the TCLP is to simulate the leaching that can occur in a landfill. Additionally, used oil is considered to be hazardous, if it contains more than 0.1 % or 1000 ppm (mg/L) of halogenated compounds or more than 50 ppm (50 mg/L) PCBs (40 CFR 761).

6.1.3 Why should we be concerned about the presence of halogenated compounds and PCBs in

<u>used oils? -</u> Most used oil is recycled as fuel for industrial operations such as cement kilns and asphalt manufacturers. During the combustion process, some of the halogens (e.g., chlorine compounds) are chemically converted into hydrogen chloride. When combined with water, which also forms during the burning of fuels, hydrogen chloride becomes hydrochloric acid. Hydrochloric acid is a toxic compound that can corrode furnaces and threaten public health. Additionally, products created from the incomplete combustion of chlorine compounds, such as

dioxins, pose significant health risks in the exhaust. Additionally, the more volatile halogen compounds have been shown to damage the ozone layer.

6.1.4 How do I determine whether I can pick up a load of used oil? - There are two (2) primary approaches to be used for determining whether the oil you plan on picking up is hazardous or not. The first approach is based on Your and/or Your Client's "Acceptable Knowledge" about the processes that generated the oils to be picked up. The second approach involves on-site assessments involving the use of your experience (i.e., chlorinated solvent-type odors), scanning of the tank headspace or a sample bottle headspace using your Cen-Tech Halogen Leak Detector model 92514 for Halogens and/or the use of Dexsil Kits to assess the existence of halogens at concentrations above 1000 ppm.

6.1.4.1 "Acceptable Knowledge" - You must first determine how the used oil was generated based on your experience, the operation that generated the used oil and the generator's knowledge and management of their operation. If you and the generator are sure that the process that generated the used oil did not involve any mixing with hazardous waste and/or the probability was very low that a hazardous mixture was generated based on the procedures used to store the used oil, you can be reasonably certain that the oil is not hazardous. However, if you have any doubts about the used oil based on the information provided by the generator, your experience or other knowledge you have, you should perform some field testing to confirm that the used oil is not hazardous based on the 1000 ppm halogen standard threshold.

<u>6.1.4.2 Testing -</u> Scan the used oil with the TIF XP – 1A Automatic Halogen Leak Detector that you carry with you in your used oil transport truck. The following procedure along with the "Assembly and Operating Instructions Manual" is to be used for scanning the used oil with you your detector.

- Switch the unit on by pressing the on / off key. The display will illuminate with the reset indication (left LED green, all others Orange) for 2 seconds. Verify the battery level by observing the constant power indicator.
- Upon turn on, the unit is set the sensitivity level to "5". A rapid, but steady beep rate will be heard. If desired the sensitivity can be adjusted by pressing the SENSITIVITY a or SENSITIVITY b key.
- Begin Halogen detection operation. If halogens are detected, then the audible tone will change to a siren type sound, distinctly different from the base beep rate. Additionally, the visual indicators will light progressively.
- Orient the probe tip within a distance of no more than ¼-inch from the surface of the liquid to be scanned.
- If the probe tip cannot be placed within a ¼-inch of the fluid surface, use a pipette or the like to collect a sample of the liquid to be scanned for halogens.
- Place the sample in a small plastic cup.
- If the detector indicates that halogens are present within a ¼-inch of the fluid being scanned, use the Dexsil "Clor-D-Tect 1000" kit to determine if the total halogen concentration in the used oil is less than or greater than 1000 ppm.
- If the Dexsil "Clor-D-Tect 1000" kit indicates that the concentration of halogens is greater than 1000 ppm, do not take the oil and contact Bryan Russel or Ed Kinley.

6.1.5 Assessment Supplies to be maintained on Every Truck for Field Testing:

- One TIF XP 1A Automatic Halogen Leak Detector in working order with good batteries.
- Two (2) Dexsil "Clor-D-Tect 1000" kits that have not expired.
- Liquid Drum sampler or the like for drawing a sample to be placed in a glass jar.
- Two plastic cups for scanning samples of used oil, if the detector probe tip cannot easily be placed within ¼-inch of the used oil surface.

6.1.6 Required Paperwork - Details of the sampling event, dates, times, analyses types and specifics sample collection information is maintained and tracked using the UES Waste Profile and Sample tracking form included in Section 6.2.1 and the laboratory Chain of Custody included as 6.2.3. After sampling has been conducted a copy of the laboratory chain of custody and profile sheet are retained in the laboratory in a labeled 3 ring binder. Sample identification nomenclature is determined by using the sampling location ID that is identified on the plant asbuilts followed by the date. If multiple samples are taken from the same location within a single day, time is added to the sample id to differentiate samples.

6.2 Waste Tracking Documents

<u>6.2.1 UES Waste Profile -</u> This Waste profile is used to record, track and provide justification for no further analyses of a waste. A copy of this waste profile and sample tracking form is retained onsite for each delivery of waste product form is retained onsite by the plant operator.

U	1650 Hemle Ph.# (813) 241	ronmental Solu ock St, Tampa , FL. - 9206 Fax# (813) hber: FLR00019980	33605 241 -9215	
A. Billing Information Company Address		A(ccount #	
City/State	Fa	Zip	Contact	20 20
B. Generator Information/Location Generator EPA ID Generator Name Address City/State Contact Phone	on of Waste	Si	te Contact	
Type of Business			(SIC Code
C. Waste Description Common Name of Waste Process Generating Waste				
D. Physical Properties	i	Color	Missocity	ll avan
Physical State Odor 100% Solid No 100% Liquid Mil Sludge Str % Free Liquid Describe	d ong	Describe:	Viscosity Low Medium High	Layers Top Middle Bottom
Flash Point <73 F	pH □ < 2 □ 2.1 - 4.9 □ 5 - 9	□ 9.1 - 12.4 □ > 12.5 □ N/A	Water	□ 30-80% □ 80-100% □ N/A
E. Volume Anticipated Volume: Estimated Frequency:	Drums	Tanker] 30-Gallon 🛛] Pump Truck 🔲 nly 🗋 Quarterly	55-Gallon
F. Constituents			G. Othe	r Hazards
Total must be equal to 100%. All constituent Constituents	is, including debris m Actual %	ust be identified. Range		Radioactive Water Reactive Oxidizer OSHA Carcinogen Explosive Pesticide Polymerizable Organic Peroxide Infectious Pryophoric
 H. Additional Information Does the waste contain dioxi Does the waste contain asbe Does the waste contain benz If yes, what is the concentrat Is the waste subject to the be Is the waste subject to RCRA Does the waste contain carci 	estos? zene? ion? enzene waste ope A Subpart CC cor	ppm erations NESHAP? htrols?	······································	es No es No es No es No es No es No es No

Form GTS87903

I. Constituents	
These values are based on Generator Knowledg	je 🛛 Analytical Results
Inorganic Metals Limit Level (mg/l) D004 Arsenic 5.0 D005 Barium 100.C D006 Cadmium 1.0 D007 Chromium 5.0 D008 Lead 5.0 D009 Mercury 0.2 D010 Selenium 1.0 D011 Silver 5.0	Pesticides/Herbicides Limit Level (mg/l) D012 Endrin 0.02 D013 Lindane 0.4 D014 Methoxychlor 10.0 D015 Toxaphene 0.5 D016 2,4-D 10.0 D017 2,4,5-TP 400.0 D020 Chlordane 0.03 D031 Heptachlor 0.008
Organic Volatile Compounds Limit Level(mg/l) D018 Benzene 0.5 D019 Carbon Tetrachloride 0.5 D021 Chlorobenzene 100.0 D022 Chlorobenzene 100.0 D022 Chlorobenzene 0.5 D029 1,2-Dichloroethane 0.5 D029 1,1-Dichloroethylene 0.7 D035 Methyl Ethyl Ketone 200.0 D039 Tetrachloroethylene 0.7 D040 Trichloroethlene 0.5 D043 Vinyl Chloride 0.2	Semi-Volatile Compounds Limit Level (mg/l) D023 o-Cresol 200.0 D024 m-Cresol 200.0 D025 p-Cresol 200.0 D026 Cresol 200.0 D027 1,4-Dichlorobenzene 7.5 D030 2,4-Dinitrotoluene 0.13 D032 Hexchlorobenzene 0.5 D033 Hexachlorobutadiene 0.5 D034 Hexachlorophenol 100.0 D037 Pentachlorophenol 100.0 D038 Pyridine 5.0 D041 2,4,5-Trichlorophenol 400.0 D042 2,4,6-Trichlorophenol 2.0
J. Wastewater Pre-Treatment Facility Certification	n
Inorganics Concentration Ammonia Nitrogen Phosphorus Potassium Formaldahyde PCB's Antimony Cobalt Copper Nikel Tin Titanium Vanadium Zinc	Organics Concentration bis (2-ethylhexy) pthalate Carbazole N-decane Fluoranthene O-Octadecane

Form GTS87903

	rdous Waste (per 40CFR2 ardous Material] Yes 🔽 No State Regu es 🔲 No Used Oil	ilated Ve:	Yes 🗌 No s 🗌 No
Proper USD OOT Hazard	OT Shipping Name: I Class UN/N/	۹	Packing Group		
L. Sample Has a sampl	le been included? 🗹 Ye	s 🗌 No	If yes, sampled by:		Date
M. Generat	or's Certification				
any samples su Generator grant	bmitted are representative of the ts U.E.S., LLC or it's authorized t	actual waste. If	I documents is correct to the best of U.E.S., LLC discovers a descrepances, the authority to amend the profile,	y during the approva	al process,
any samples su Generator grant to reflect the de N. Reserved	bmitted are representative of the ts U.E.S., LLC or it's authorized t	actual waste. If hird party facilitie	U.E.S., LLC discovers a descrepanc	y during the approva	al process,

Form GTS87903

6.2.2 Uniform Non-hazardous Waste Manifest:

	NON-HAZARDOUS WASTE MANIFEST	1. Generator's US		Ma	inifest Doc. No.	2. Page of	1			1	a.
3.	Generator's Name and Mailing Address								1		
	Generator's Phone ()	a land			5. P. 1						
5.	Transporter 1 Company Name			S EPA ID Numb			porter's Pl				
7.	Transporter 2 Company Name		8. US	S EPA ID Numb	ber	B. Trans	sporter's P	hone			
9.	Designated Facility Name and Site Address	A VAL	10. US	S EPA ID Numb	ber	C. Facilit	ty's Phone				
_							12. Cont	ainara	10	-	14.
11	 Waste Shipping Name and Description 	1.85			31.83		No.	Type	13. Total Quantity	e., .	Unit Wt/Vo
a.											
b.			3	1210	20.0	-		•			-
C.		1.1.1.1			1						
	Sector Sector	Level						1			
d.											- 1
D.	Additional Descriptions for Materials Listed Abe	ove				E. Hand	ling Codes	for Was	ites Listed Ab	bove	
	Additional Descriptions for Materials Listed Abd	2				E. Hand	ling Codes	s for Was	tes Listed Ab	Dove	
15	5. Special Handling Instructions and Additional In	formation									
15		formation	ove on this manifes Signati		t to federal regula						
15	5. Special Handling Instructions and Additional In 6. GENERATOR'S CERTIFICATION: 1 certify the Printed/Typed Name	formation			t to federal regula				al of Hazardoo	us Was	tta. Yas
15	5. Special Handling Instructions and Additional In 6. GENERATOR'S CERTIFICATION: 1 certify the	formation		ure	t to federal regula				al of Hazardoo	us Was	Yea
15	5. Special Handling Instructions and Additional In 6. GENERATOR'S CERTIFICATION: 1 certify the Printed/Typed Name 7. Transporter 1 Acknowledgement of Receipt of Printed/Typed Name	formation materials described ab Materials	Signatu	ure	t to federal regula				ial of Hazardoo Month	us Was Day	Yea
15	5. Special Handling Instructions and Additional In 6. GENERATOR'S CERTIFICATION: 1 certify the Printed/Typed Name 7. Transporter 1 Acknowledgement of Receipt of	formation materials described ab Materials	Signatu	ure	t to federal regula				ial of Hazardoo Month	us Was Day	Yes
15	5. Special Handling Instructions and Additional In 6. GENERATOR'S CERTIFICATION: 1 certify the Printed/Typed Name 7. Transporter 1 Acknowledgement of Receipt of Printed/Typed Name 8. Transporter 2 Acknowledgement of Receipt of Printed/Typed Name 9. Discrepancy Indication Space	formation materials described ab Materials Materials	Signatu Signatu Signatu	ure		ations for rej			ial of Hazardon Month Month	us Was Day Day	Yes Yes Yes
15	5. Special Handling Instructions and Additional In 6. GENERATOR'S CERTIFICATION: 1 certify the Printed/Typed Name 7. Transporter 1 Acknowledgement of Receipt of Printed/Typed Name 8. Transporter 2 Acknowledgement of Receipt of Printed/Typed Name	formation materials described ab Materials Materials	Signatu Signatu Signatu	ure ure s manifest-excep		ations for rej			ial of Hazardon Month Month	us Was Day Day	Yes Yes Yes

6.3 Sludge Analytical Results



Ed Kinley Universal El PO Box 761 Tampa, FL 3		utions			September 29, 2	2014
	abs Project Num Not Project Descrip		4090807 Plant Sludge Box			
Dear Mr. Ki	nley,					
Enclosed is	the report of labo	pratory analysis for the	following samples:			
5	ample Number	Sample Description		Date Collected	Date Received	
	4090807-01	Roll-off/Sludge Box		09/08/14 11:30	09/08/14 16:50	
		w or in the report and v	vhere applicable: iperature and analyzed as received.			

- · Sample condition upon receipt is reported on the chain-of-custody attached to this report.
- Results for all solid matrices are reported on a dry weight basis.
- Appropriate calibration and QC criteria were satisfactorily met.
- All applicable holding times for analytes have been met.
- Copies of the chains-of-custody, if received, are attached to this report.

Sample 4090807-01 was leached for TCLP on 09/09/14 at 1600. The TCLP Leachate was created 09/10/14 at 1000.

QC Batch B006902 had an exception for Mercury on the MS and RPD. The LCS and LCSD were acceptable, so the out of control was attributed to matrix.

QC Batch B006921 had exceptions for VOC's on the MS. The LCS and LCSD were acceptable, so the out of control was attributed to matrix.

QC Batch B006957 had an exception for Hexachlorobenzene and Pyridine on the LCS/LCSD RPD. All samples were non-detect for these analytes.

Sample 4090807-01 was leached for TCLP on 09/24/14 at 1556. The TCLP Leachate was created 09/25/14 at 0913.

If you have any questions or comments concerning this report, please do not hesitate to contact us.

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Michael W. Palmer Vice President, Laboratory Operations

Unless Otherwise Noted and Where Applicable:

The result herein relate only to the items tested or to the samples as received by the laboratory. This report shall not be reproduced except in full, without the written approval of SunLabs. All samples will be disposed of within 60 days of the date of receipt of the samples. All results meet the requirements of the NELAC standards. Uncertainty values are available upon request.

SunLabs, Inc 5460 Beaumont Center Blvd., Suite 520 Tampa, FL 33634 Laboratory ID Number E84809

Page 1 of 10



Report of Laboratory Analysis

 SunLabs Project Number
 Universal Environmental Solutions

 4090807
 Project Description

 Plant Sludge Box
 Project Sudge Box

September 29, 2014

SunLabs Sample Number: Sample Designation:	4090807-01 Roll-off/Sludge Box						/14 11:30 /14 16:50		
Parameters	Method	Units	Results	Dil Factor	MDL	PQL	CAS Number	Date/Time Analyzed	Date/Time Prep
Mercury by EPA 7470					Metho	d Qualifier:			
Mercury	EPA 7470	ug/L	0.96	1	0.14	0.58	7439-97-6	09/11/14 18:15	09/10/14 11:00
RCRA7 Metals by EPA 6010					Metho	d Qualifier:			
Arsenic	EPA 6010	ug/L	72 I	1	25	100	7440-38-2	09/11/14 15:34	09/10/14 11:22
Barium	EPA 6010	ug/L	2100	1	2.6	10	7440-39-3	09/11/14 15:34	09/10/14 11:22
Cadmium	EPA 6010	ug/L	14 I	1	4.6	18	7440-43-9	09/11/14 15:34	09/10/14 11:22
Chromium	EPA 6010	ug/L	230	1	10	40	7440-47-3	09/11/14 15:34	09/10/14 11:22
Lead	EPA 6010	ug/L	310	1	24	95	7439-92-1	09/11/14 15:34	09/10/14 11:22
Selenium	EPA 6010	ug/L	22 U	1	22	90	7782-49-2	09/11/14 15:34	09/10/14 11:22
Silver	EPA 6010	ug/L	10 U	1	10	41	7440-22-4	09/11/14 15:34	09/10/14 11:22
TCLP Metals by EPA 6010					Metho	d Qualifier:			
Barium	EPA 6010	mg/L	0.070 I	1	0.0010	0.10	7440-39-3	09/26/14 19:14	09/25/14 12:41
Chromium	EPA 6010	mg/L	0.0035 U	1	0.0035	0.10	7440-47-3	09/26/14 19:14	09/25/14 12:41
Lead	EPA 6010	mg/L	0.0044 U	1	0.0044	0.10	7439-92-1	09/26/14 19:14	09/25/14 12:41
TCLP Semivolatiles by EPA 8270					Metho	d Qualifier:	() ()		
Surrogate: 2-Fluorophenol (0-58)	EPA 8270	%	31.0	1			367-12-4	09/18/14 19:08	09/11/14 17:16
Surrogate: Phenol-d6 (0-38)	EPA 8270	%	22.7	1			13127-88-3	09/18/14 19:08	09/11/14 17:16
Surrogate: Nitrobenzene-d5 (0-118)	EPA 8270	%	68.7	1			4165-60-0	09/18/14 19:08	09/11/14 17:16
Surrogate: 2-Fluorobiphenyl (0-115)	EPA 8270	96	65.9	1			321-60-8	09/18/14 19:08	09/11/14 17:16
Surrogate: 2,4,6-Tribromophenol (0-144)	EPA 8270	%	77.7	1			118-79-6	09/18/14 19:08	09/11/14 17:16
Surrogate: p-Terphenyl-d14 (1-148)	EPA 8270	%	75.5	1			1718-51-0	09/18/14 19:08	09/11/14 17:16
1.4-Dichlorobenzene	EPA 8270	mg/L	0.0050 U	1	0.0012	0.0050	106-46-7	09/18/14 19:08	09/11/14 17:16
2,4,5-Trichlorophenol	EPA 8270	mg/L	0.0050 U	1	0.00065	0.0050	95-95-4	09/18/14 19:08	09/11/14 17:16
2,4,6-Trichlorophenol	EPA 8270	mg/L	0.0050 U	1	0.00073	0.0050	88-06-2	09/18/14 19:08	09/11/14 17:16
2,4-Dinitrotoluene	EPA 8270	mg/L	0.0050 U	1	0.0041	0.0050	121-14-2	09/18/14 19:08	09/11/14 17:16
Hexachlorobenzene	EPA 8270	mg/L	0.0050 U	1	0.00063	0.0050	118-74-1	09/18/14 19:08	09/11/14 17:16
Hexachlorobutadiene	EPA 8270	mg/L	0.0050 U	1	0.00061	0.0050	87-68-3	09/18/14 19:08	09/11/14 17:16
Hexachloroethane	EPA 8270	mg/L	0.0050 U	1	0.00092	0.0050	67-72-1	09/18/14 19:08	09/11/14 17:16
m&p-cresol	EPA 8270	mg/L	0.0050 U	1	0.00077	0.0050		09/18/14 19:08	09/11/14 17:16
Nitrobenzene	EPA 8270	mg/L	0.0050 U	1	0.00073	0.0050	98-95-3	09/18/14 19:08	09/11/14 17:16
o-cresol	EPA 8270	mg/L	0.0050 U	1	0.00064	0.0050	95-48-7	09/18/14 19:08	09/11/14 17:16
Pentachlorophenol	EPA 8270	mg/L	0.020 U	1	0.00067	0.020	87-86-5	09/18/14 19:08	09/11/14 17:16
Pyridine	EPA 8270	mg/L	0.020 U	1	0.0023	0.020	110-86-1	09/18/14 19:08	09/11/14 17:16

SunLabs, Inc 5460 Beaumont Center Blvd., Suite 520 Tampa, FL 33634 Laboratory ID Number E84809 Page 2 of 10



Report of Laboratory Analysis

SunLabs Project Number	Universal Environmental Solutions
4090807	Project Description
	Plant Sludge Box

September 29, 2014

SunLabs Sample Number: Sample Designation:	4090807-01 Roll-off/Sludge Box	Date C	Matrix: Date Collected: Date Received:			/14 11:30 /14 16:50			
Parameters	Method	Units	Results	Dil Factor	MDL	PQL	CAS Number	Date/Time Analyzed	Date/Time Prep
TCLP Volatiles by EPA 8260					Metho	d Qualifier			
Surrogate: 4-Bromofluorobenzene (82-118)	EPA 8260	%	96.9	1			460-00-4	09/11/14 13:19	09/11/14 08:00
Surrogate: Dibromofluoromethane (85-120)	EPA 8260	%	109	1			1868-53-7	09/11/14 13:19	09/11/14 08:00
Surrogate: Toluene-d8 (83-115)	EPA 8260	%	100	1			2037-26-5	09/11/14 13:19	09/11/14 08:00
Benzene	EPA 8260	mg/L	0.092 U	100	0.023	0.092	71-43-2	09/11/14 13:19	09/11/14 08:00
2-Butanone (MEK)	EPA 8260	mg/L	0.84 U	100	0.21	0.84	78-93-3	09/11/14 13:19	09/11/14 08:00
Carbon tetrachloride	EPA 8260	mg/L	0.072 U	100	0.018	0.072	56-23-5	09/11/14 13:19	09/11/14 08:00
Chlorobenzene	EPA 8260	mg/L	0.076 U	100	0.019	0.076	108-90-7	09/11/14 13:19	09/11/14 08:00
Chloroform	EPA 8260	mg/L	0.074 U	100	0.019	0.074	67-66-3	09/11/14 13:19	09/11/14 08:00
1,1-Dichloroethene	EPA 8260	mg/L	0.13 U	100	0.034	0.13	75-35-4	09/11/14 13:19	09/11/14 08:00
1,2-Dichloroethane	EPA 8260	mg/L	0.097 U	100	0.024	0.097	107-06-2	09/11/14 13:19	09/11/14 08:00
1,4-Dichlorobenzene	EPA 8260	mg/L	0.084 U	100	0.021	0.084	106-46-7	09/11/14 13:19	09/11/14 08:00
Tetrachloroethene	EPA 8260	mg/L	0.14 U	100	0.036	0.14	127-18-4	09/11/14 13:19	09/11/14 08:00
Trichloroethene	EPA 8260	mg/L	0.19 U	100	0.048	0.19	79-01-6	09/11/14 13:19	09/11/14 08:00
Vinyl chloride	EPA 8260	mg/L	0.10 U	100	0.025	0.10	75-01-4	09/11/14 13:19	09/11/14 08:00

Footnotes

U J

The compound was analyzed for but not detected. The reported value failed to meet the established quality control criteria for either precision or accuracy (see cover letter for explanation) The reported value is between the laboratory method detection limit and the laboratory practical quantitation limit.

] I **

SunLabs is not currently NELAC certified for this analyte. Unless directed otherwise by client, a NELAC certified sub-contract laboratory has performed this analysis (see cover letter for details). Laboratory Control Sample / Laboratory Control Sample Duplicate

LCS / LCSD

MB MS / MSD Method Blank

Matrix Spike / Matrix Spike Duplicate

RPD Relative Percent Difference

SunLabs, Inc 5460 Beaumont Center Blvd., Suite 520 Tampa, FL 33634

Laboratory ID Number E84809 Page 3 of 10



SunLabs Project Number 4090807	Quality Control Data
SunLabs Project Number	Universal Environmental Solutions
SunLabs Project Number	Project Description
	Plant Sludge Box

				Spike	Parent		%REC		RPD	
Analyte		Result	Units	Level	Result	%REC	Limits	RPD	Limit	Flags
Blank (B006901-BLK1)				Prep	ared: 09/10/1	4 Analyzed: 09	9/11/14			
Arsenic		5.0 U	ug/L							
Sarium		0.52 U	ug/L							
Cadmium		0.93 U	ug/L							
hromium		2.0 U	ug/L							
ead		4.7 U	ug/L							
Selenium		4.4 U	ug/L							
ilver		2.1 U	ug/L							
LCS (B006901-BS1)				Prep	ared: 09/10/1	4 Analyzed: 09	9/11/14			
vrsenic		950	ug/L	990		96.0	80-120			
Barium		940	ug/L	990		95.1	80-120			
Cadmium		910	ug/L	990		92.1	80-120			
Chromium		880	ug/L	990		88.5	80-120			
ead		900	ug/L	990		91.2	80-120			
ielenium		940	ug/L	990		95.3	80-120			
lilver		890	ug/L	990		90.2	80-120			
LCS Dup (B006901-BSD1)				Prec	ared: 09/10/1	4 Analyzed: 05	0/11/14			
Arsenic		890	ug/L	990		89.8	80-120	6.75	20	
Barium		920	ug/L	990		92.7	80-120	2.56	20	
Cadmium		870	ug/L	990		88.0	80-120	4.58	20	
Chromium		830	ug/L	990		84.3	80-120	4.91	20	
ead		890	ug/L	990		89.8	80-120	1.52	20	
Selenium		910	ug/L	990		91.9	80-120	3.59	20	
lilver		860	ug/L	990		86.6	80-120	4.11	20	
Matrix Spike (B006901-MS	1)	Parent Sample	-		ared: 09/10/1					
Arsenic	-/	4200	ug/L	5000	72	83.0	75-125			
Barium		6300	ug/L	5000	2100	85.7	75-125			
Cadmium		4200	ug/L	5000	14	83.6	75-125			
Chromium		4100	ug/L	5000	230	77.8	75-125			
ead		4300	ug/L	5000	310	81.4	75-125			
Selenium		4300	ug/L	5000	ND	87.7	75-125			
Silver		3900	ug/L	5000	ND	78.2	75-125			
Matrix Spike Dup (B00690	1-MSD1)	Parent Sample	n and the second		ared: 09/10/1					
vrsenic		4200	ug/L	5000	72	4 Analyzeo: 0: 84.3	75-125	1.48	20	
Sarium		6300	ug/L	5000	2100	85.0	75-125	0.567	20	
Cadmium		4100	ug/L	5000	14	82.9	75-125	0.873	20	
Thromium		4100	ug/L	5000	230	77.4	75-125	0.560	20	
ead		4200	ug/L	5000	310	78.4	75-125	3.41	20	
Selenium		4400	ug/L	5000	ND	89.1	75-125	1.65	20	
Silver		3900	ug/L	5000	ND	78.5	75-125	0.488	20	

SunLabs, Inc 5460 Beaumont Center Blvd., Suite 520 Tampa, FL 33634 Laboratory ID Number E84809 Page 4 of 10

Solutions	SunLabs Project Number 4090807	Project Description					
	Project Number	Universal Environmenta Solutions					

Ouality Control Data

Batch No: B006902 Mercury-W 7470 Test:

· · · · · ·			Spike	Parent		%REC		RPD	
Analyte	Result	Units	Level	Result	%REC	Limits	RPD	Limit	Flage
Blank (B006902-BLK1)			Prep	ared: 09/10/1	4 Analyzed: 0	9/11/14			
Mercury	0.018 U	ug/L							
LCS (B006902-BS1)			Prep	ared: 09/10/1	4 Analyzed: 0	9/11/14			
Mercury	4.5	ug/L	5.0		90.8	80-120			
LCS Dup (B006902-BSD1)			Prep	ared: 09/10/1	4 Analyzed: 0	9/11/14			
Mercury	4.6	ug/L	5.0		92.4	80-120	1.73	20	
Matrix Spike (B006902-MS1)	Parent Sample	e: 4090807-01	Pres	ared: 09/10/1	4 Analyzed: 0	9/11/14			
Mercury	20	ug/L	40	0.96	46.7	75-125			J
Matrix Spike Dup (B006902-MSD1)	Parent Sample	e: 4090807-01	Prep	aned: 09/10/1	4 Analyzed: 0	9/11/14			
Mercury	32	ug/L	40	0.96	76.4	75-125	46.3	20	J

Batch No:

B006921 TCL P VOC 8260

			Spike	Parent		%REC		RPD	
Analyte	Result	Units	Level	Result	%REC	Limits	RPD	Limit	Flags
Blank (B006921-BLK1)			Prep	ared & Analyz	ed: 09/11/14				
Surrogate: 4-Bromofluorobenzene	48	ug/L	50		95.8	82-118			
Surrogate: Dibromofluoromethane	52	ug/L	50		103	85-120			
Surrogate: Toluene-d8	50	ug/L	50		101	83-115			
Benzene	0.00023 U	mg/L							
2-Butanone (MEK)	0.0021 U	mg/L							
Carbon tetrachloride	0.00018 U	mg/L							
Chlorobenzene	0.00019 U	mg/L							
Chloroform	0.00019 U	mg/L							
1,1-Dichloroethene	0.00034 U	mg/L							
1,2-Dichloroethane	0.00024 U	mg/L							
1,4-Dichlorobenzene	0.00021 U	mg/L							
Tetrachloroethene	0.00036 U	mg/L							
Trichloroethene	0.00048 U	mg/L							
Vinyl chloride	0.00025 U	mg/L							
LCS (B006921-BS1)			Prep	ared & Analyz	ed: 09/11/14				
Surrogate: 4-Bromofluorobenzene	50	ug/L	50		99.1	82-118			
Surrogate: Dibromofluoromethane	52	ug/L	50		104	85-120			
Surrogate: Toluene-d8	50	ug/L	50		99.2	83-115			
Benzene	0.022	mg/L	0.020		112	80-120			
2-Butanone (MEK)	0.22	mg/L	0.20		109	53-130			
Carbon tetrachloride	0.019	mg/L	0.020		97.3	75-120			
Chlorobenzene	0.021	mg/L	0.020		103	80-120			
Chloroform	0.022	mg/L	0.020		109	80-120			
1,1-Dichloroethene	0.020	mg/L	0.020		101	80-120			
1,2-Dichloroethane	0.021	mg/L	0.020		106	80-120			
1,4-Dichlorobenzene	0.022	mg/L	0.020		111	69-135			
Tetrachloroethene	0.021	mg/L	0.020		104	80-120			
Trichloroethene	0.021	mg/L	0.020		105	80-112			
Vinyl chloride	0.019	mg/L	0.020		93.6	78-131			

SunLabs, Inc

Laboratory ID Number E84809

5460 Beaumont Center Blvd., Suite 520

Tampa, FL 33634

Page 5 of 10



(Quality Control Dat
SunLabs Project Number	Universal Environmental Solutions
4090807	Project Description
	Plant Sludge Box

Batch No: **B006921** Test: **TCLP VOC 8260**

			Spike	Parent		%REC		RPD	
Analyte	Result	Units	Level	Result	%REC	Limits	RPD	Limit	Flags
LCS Dup (B006921-BSD1)			Prep	pared & Analyz	ed: 09/11/14				
Surrogate: 4-Bromofluorobenzene	50	ug/L	50		99.1	82-118			
Surrogate: Dibromofluoromethane	51	ug/L	50		103	85-120			
Surrogate: Toluene-d8	50	ug/L	50		100	83-115			
Benzene	0.022	mg/L	0.020		112	80-120	0.223	20	
2-Butanone (MEK)	0.21	mg/L	0.20		103	53-130	5.83	20	
Carbon tetrachloride	0.020	mg/L	0.020		97.6	75-120	0.308	20	
Chlorobenzene	0.021	mg/L	0.020		104	80-120	1.11	20	
Chloroform	0.022	mg/L	0.020		109	80-120	0.0920	20	
1,1-Dichloroethene	0.020	mg/L	0.020		100	80-120	0.645	20	
1,2-Dichloroethane	0.021	mg/L	0.020		103	80-120	2.87	20	
1,4-Dichlorobenzene	0.022	mg/L	0.020		110	69-135	0.271	20	
Fetrachloroethene	0.021	mg/L	0.020		104	80-120	0.865	20	
Frichloroethene	0.021	mg/L	0.020		104	80-112	0.911	20	
Vinyl chloride	0.018	mg/L	0.020		89.8	78-131	4.09	20	
Matrix Spike (B006921-MS1)	Parent Sample	: 4090807-01	Prep	oared & Analyz	ed: 09/11/14				
Surrogate: 4-Bromofluorobenzene	49	ug/L	50		98.9	82-118			
Surrogate: Dibromofluoromethane	57	ug/L	50		114	85-120			
Surrogate: Toluene-d8	51	ug/L	50		102	83-115			
Benzene	0.028	mg/L	0.020	ND	140	45-149			
2-Butanone (MEK)	0.26	mg/L	0.20	ND	129	55-143			
Carbon tetrachloride	0.023	mg/L	0.020	ND	116	70-120			
Chlorobenzene	0.022	mg/L	0.020	ND	108	73-120			
Chloroform	0.027	mg/L	0.020	ND	136	77-122			1
1,1-Dichloroethene	0.026	mg/L	0.020	ND	131	63-126			J
1,2-Dichloroethane	0.026	mg/L	0.020	ND	128	81-122			J
1,4-Dichlorobenzene	0.021	mg/L	0.020	ND	106	68-135			
etrachloroethene	0.020	mg/L	0.020	ND	98.8	57-141			
Frichloroethene	0.022	mg/L	0.020	ND	112	66-124			
/invl chloride	0.022	mg/L	0.020	ND	112	71-142			

Laboratory ID Number E84809 Page 6 of 10 Phone: (813) 881-9401 Email: Info@SunLabsInc.com Website: www.SunLabsInc.com



SunLabs Project Number	Universal Environmenta Solutions					
4090807	Project Description					
	Plant Sludge Box					

Quality Control Data

Batch No: **B006957** Test: **TCLP SVOC 8270**

			Spike	Parent		%REC		RPD	
Analyte	Result	Units	Level	Result	%REC	Limits	RPD	Limit	Flage
Blank (B006957-BLK1)			Prep	ared: 09/11/1	4 Analyzed: 0	9/18/14			
Surrogate: 2-Fluorophenol	0.34	mg/L	1.0		33.9	0-58			
Surrogate: Phenol-d6	0.22	mg/L	1.0		21.8	0-38			
Surrogate: Nitrobenzene-d5	0.75	mg/L	1.0		75.3	0-118			
Surrogate: 2-Fluorobiphenyl	0.72	mg/L	1.0		72.2	0-115			
Surrogate: 2,4,6-Tribromophenol	0.79	mg/L	1.0		78.8	0-144			
Surrogate: p-Terphenyl-d14	1.0	mg/L	1.0		105	1-148			
1,4-Dichlorobenzene	0.0012 U	mg/L							
2,4,5-Trichlorophenol	0.00065 U	mg/L							
2,4,6-Trichlorophenol	0.00073 U	mg/L							
2,4-Dinitrotoluene	0.0041 U	mg/L							
- lexachlorobenzene	0.00063 U	mg/L							
Hexachlorobutadiene	0.00061 U	mg/L							
Hexachloroethane	0.00092 U	mg/L							
n&p-cresol	0.00077 U	mg/L							
Nitrobenzene	0.00073 U	mg/L							
o-cresol	0.00064 U	mg/L							
Pentachlorophenol	0.00067 U	mg/L							
Pyridine	0.0023 U	mg/L							
LCS (B006957-BS1)			Drar	ared: 09/11/1	4 Analyzed: O	2/18/14			
Surrogate: 2-Fluorophenol	0.32	mg/L	1.0	All CO. 09/11/1	32.2	0-58			
Surrogate: Phenol-d6	0.24	mg/L	1.0		23.8	0-38			
Surrogate: Nitrobenzene-d5	0.74	mg/L	1.0		74.0	0-118			
urrogate: 2-Fluorobiphenyl	0.82	mg/L	1.0		81.6	0-115			
urrogate: 2,4,6-Tribromophenol	0.81	mg/L	1.0		81.4	0-144			
Surrogate: p-Terphenyl-d14	0.97	mg/L	1.0		96.9	1-148			
,4-Dichlorobenzene	0.24	mg/L	0.50		48.4	10-88			
,,,5-Trichlorophenol	0.44	mg/L	0.50		87.7	47-113			
2,4,6-Trichlorophenol	0.44	mg/L	0.50		88.5	54-102			
	0.50		0.50		100	51-119			
2,4-Dinitrotoluene		mg/L							
lexachlorobenzene	0.25	mg/L	0.50		49.7	47-114			
lexachlorobutadiene	0.25	mg/L	0.50		49.2	11-85			
texachloroethane n&p-cresol	0.25	mg/L	0.50		49.7	6-87 4-116			
nxp-cresoi Nitrobenzene	0.40	mg/L	0.50		80.2	48-101			
viurobenzene o-cresol	0.40	mg/L	0.50		42.1	22-78			
>-cresoi Pentachlorophenol	0.61	mg/L	0.50						
		mg/L			123	22-133			
Pyridine LCS Dup (B006957-BSD1)	0.11	mg/L	0.50		22.1	20-120			
			11122	ared: 09/11/1		2010-01-00 			
Surrogate: 2-Fluorophenol	0.38	mg/L	1.0		37.7	0-58			
Surrogate: Phenol-d6	0.26	mg/L	1.0		25.9	0-38			
Surrogate: Nitrobenzene-d5	0.80	mg/L	1.0		79.8	0-118			
Surrogate: 2-Fluorobiphenyl	0.68	mg/L	1.0		68.0	0-115			
Surrogate: 2,4,6-Tribromophenol	0.78	mg/L	1.0		78.1	0-144			
Surrogate: p-Terphenyl-d14	1.0	mg/L	1.0		99.9	1-148	1000	55830	
,4-Dichlorobenzene	0.23	mg/L	0.50		45.3	10-88	6.61	20	
2,4,5-Trichlorophenol	0.43	mg/L	0.50		85.3	47-113	2.75	20	
2,4,6-Trichlorophenol	0.43	mg/L	0.50		85.3	54-102	3.68	20	
2,4-Dinitrotoluene	0.49	mg/L	0.50		98.5	51-119	1.55	20	
fexachlorobenzene	0.44	mg/L	0.50		87.1	47-114	54.7	20	J

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SunLabs roject Number	Universal Environmental Solutions						
4090807	Project Description						
	Plant Sludge Box						

Quality Control Data

Batch No: B006957

			Spike	Parent		%REC		RPD	
Analyte	Result	Units	Level	Result	%REC	Limits	RPD	Limit	Flags
LCS Dup (B006957-BSD1)			Prep	ared: 09/11/1	4 Analyzed: 0	9/18/14			
Hexachlorobutadiene	0.22	mg/L	0.50		44.8	11-85	9.28	20	
Hexachloroethane	0.24	mg/L	0.50		48.3	6-87	2.90	20	
m&p-cresol	0.53	mg/L				4-116	10.2	20	
Nitrobenzene	0.42	mg/L	0.50		83.8	48-101	4.39	20	
o-cresol	0.24	mg/L	0.50		48.5	22-78	14.1	20	
Pentachlorophenol	0.54	mg/L	0.50		109	22-133	12.3	20	
Pyridine	0.14	mg/L	0.50		27.5	20-120	21.7	20	J
Matrix Spike (B006957-MS1)	Parent Sample	2: 4090807-01	Prep	ared: 09/11/1	4 Analyzed: 0	9/18/14			
Surrogate: 2-Fluorophenol	0.33	mg/L	1.0		33.5	0-58			
Surrogate: Phenol-d6	0.26	mg/L	1.0		25.6	0-38			
Surrogate: Nitrobenzene-d5	0.75	mg/L	1.0		74.6	0-118			
Surrogate: 2-Fluorobiphenyl	0.83	mg/L	1.0		82.7	0-115			
Surrogate: 2,4,6-Tribromophenol	0.74	mg/L	1.0		74.4	0-144			
Surrogate: p-Terphenyl-d14	0.70	mg/L	1.0		70.0	1-148			
1,4-Dichlorobenzene	0.25	mg/L	0.50	ND	49.4	9-78			
2,4,5-Trichlorophenol	0.46	mg/L	0.50	ND	91.3	28-124			
2,4,6-Trichlorophenol	0.42	mg/L	0.50	ND	83.2	33-112			
2,4-Dinitrotoluene	0.50	mg/L	0.50	ND	99.5	40-119			
Hexachlorobenzene	0.41	mg/L	0.50	ND	81.6	31-119			
Hexachlorobutadiene	0.22	mg/L	0.50	ND	44.7	5-75			
Hexachloroethane	0.27	mg/L	0.50	ND	53.3	0-96			
m&p-cresol	0.41	mg/L		ND		2-118			
Nitrobenzene	0.41	mg/L	0.50	ND	81.7	30-103			
o-cresol	0.13	mg/L	0.50	ND	25.0	16-69			
Pentachlorophenol	0.60	mg/L	0.50	ND	120	17-150			
Pyridine	0.11	mg/L	0,50	ND	22.0	20-150			

Laboratory ID Number E84809 Page 8 of 10 Phone: (813) 881-9401 Email: Info@SunLabsInc.com Website: www.SunLabsInc.com



Ģ	Quality Control Data
SunLabs Project Number	Universal Environmental Solutions
4090807	Project Description
	Plant Sludge Box

Batch No: B007169

Test: TCLP RCRA7									
			Spike	Parent		%REC		RPD	
Analyte	Result	Units	Level	Result	%REC	Limits	RPD	Limit	Flags
Blank (B007169-BLK1)			Prep	ared: 09/25/1	4 Analyzed: 0	9/26/14			
Barium	0.0010 U	mg/L							
Chromium	0.0035 U	mg/L							
Lead	0.0044 U	mg/L							
LCS (B007169-BS1)			Prep	ared: 09/25/1	4 Analyzed: 0	9/26/14			
Barium	4.6	mg/L	5.0		92.0	80-120			
Chromium	4.4	mg/L	5.0		89.2	80-120			
Lead	4.3	mg/L	5.0		87.3	80-120			
LCS Dup (B007169-BSD1)			Prep	ared: 09/25/1	4 Analyzed: 0	9/26/14			
Barium	4.5	mg/L	5.0		91.2	80-120	0.881	20	
Chromium	4.5	mg/L	5.0		90.9	80-120	1.92	20	
Lead	4.4	mg/L	5.0		88.3	80-120	1.11	20	
Matrix Spike (B007169-MS1)	Parent Sample	: 4090807-01	Prep	ared: 09/25/1	4 Analyzed: 0	9/26/14			
Barium	4.5	mg/L	5.0	0.070	90.1	80-120			
Chromium	4.5	mg/L	5.0	ND	90.8	80-120			
Lead	4.2	mg/L	5.0	ND	85.8	80-120			

	S	amples Associated with QC Batches	
QC Batch ID	Method	Sample List	
B006894	EPA 1311	4090807-01	
B006895	EPA 1311	4090807-01	
B006901	EPA 6010	4090807-01	
B006902	EPA 7470	4090807-01	
B006921	EPA 8260	4090807-01	
B006957	EPA 8270	4090807-01	
B007151	EPA 1311	4090807-01RE1	
B007169	EPA 6010	4090807-01	

Laboratory ID Number E84809 Page 9 of 10

envention F thx unity analysis / Method Refuested Requested P analysis / Method Refu analysis /	Temp upon receipt: 1 / "C Surplus with holding inve? Received on [ce? () N / NA And with holding inve?	W - Winter (Blancha) 0 - Other (Specify Sindage)	Handrit Codes: SD = Soil Soil = Soil Internal Use Only A = Ar SW = Surface Water Sunda Catolina Uson Recald: DW = Drivering Water WS = Waste WWW Visite Water Custody Seals present?	Guass Amber T = Todias Beg Dice only P = Planaic O = Other (Specify) N = Natric Add S = Sodium bisualities + Ica	Bottle Time Contest. Bottle Time Contest. GV = Glass Vial GVS = Low Level Volatile Kit H = Hydrochionic Acid + Ice	ter sidnahufu / Bette: / Altitudion:									01 Koll-97 /5/-430 /01 /0		SunLabs Sample Description	E-Mail:	an 100- 0459	Address:
Pot:			Y On	VS = NaHSO4, MeOH, + Ica T = Sodium thiosulfate + Ica O = Other (Specify)	s = Suth	N.E.S.									+	Time Bottles	# of	P	ain / Mathand	
Po# At Bill To: Due Date Requested": Due Date Requested": FDEP PreApproval site Date TEDP (PGM): Facility/Site II: Facility/Site II: SunLaba, Inc. SunLaba, Inc. SunLaba, Inc.	5460 Beaumont Cents Phone: 813 e-mail: info@SunL			1 I	Ask	SUNLABS, INC. RESERVES TO UNRETURNED SAMPLI Relinquished By:											ola	ble Vol	۳ ۲	
	SunLabs, Inc. ar Blvd., Suite 520, Tampa, Florida 33 -881-9401 / Fax: 813-354-4661 -abslnc.com www.SunLabslnc.com	elinquished To: Date:	elinquished To: Da	Multing and the start		HE RIGHT TO BILL FOR DISPOSAL OF UN ES AND TO RETURN UNUSED SAMPLES.	other than 5 years:*	Length of Record R	Total Ref	1.0	Tap Voc	Hpuls H	+ Wastr	Remarks / Comments:	ADaPT EDD (PGM:	FDEP PreApproval site		Due Date Decuesta	AR BIN 10:	PO#

ATTACHMENT 7 – SWPPP

Revision 3 Attachment 7 Modifications - No text changes have been added to this attachment. The page numbers, revision number and dates have been updated. Revision 4 - No Changes

UES is submitting a No Exposure Certification for Exclusion from NEPDES Stormwater Permitting form 62-620.910(17) request. The request is attached below and will be submitted to the FDEP no later than 10/30/14.

Exemption status is based on the facility policy of zero discharge of rainwater on the tank containment pad and no exposure routes for impacted stormwater to navigable waters as detailed in 40 CFR 122 and 62-762 FAC. A copy of the NEC is attached below as well as a Site Map showing the stormwater drainage patterns.

UNIVERSAL ENVIRONMENTAL SOLUTIONS

Го:	Stormwater Div. Notices Center, MS #2510		February 2, 2015
	FDEP 2600 Blairstone Road Tallahassee, FL 32399-2400	File:	No Exposure Certification for Exclusion from NPDES Stormwater Permitting
	nclosed please find: X_herewithunder separate co	ver:drav	vingsdescriptive literatureletters

Letter of Transmittal

If all information listed is not received, please contact us immediately.

Quantity	Title	Comments
1 PDF (Electronic)	No Exposure Certification for Exclusion from NPDES Stormwater Permitting.	
	Universal Environmental Solutions, LLC – DEP ID #FLR000199802	Y

*Comment letter code:

R-Reviewed N-Reviewed and Noted I-For your Information Y-For your approval

The attached No Exposure Certification for Exclusion from NPDES Stormwater Permitting (FORM 62-620.910(17), F.A.C.) is being submitted for your review and approval.

Regards, Ed Kinley, President

DISTRIBUTION:

Beheem Kothur (FDEP) Elizabeth Knauss (FDEP) Anthony Tripp (FDEP) Bryan Baker (FDEP) Keith Coats (P.E.) Jim Seavy (Consultant)

P.O. Box 76105, Tampa, FL 33675 ~ Phone (813) 241-9206 ~ Fax (813) 241-9215



NO EXPOSURE CERTIFICATION FOR EXCLUSION FROM NPDES STORMWATER PERMITTING (FORM 62-620.910(17), F.A.C.)

Incorporated by reference in Rule 62-620.100(2)(0)1.b., F.A.C.

Submission of this No Exposure Certification and certification fee constitutes your affirmation that the entity identified in Section II does not require permit authorization for stormwater discharges associated with industrial activity pursuant to paragraph 62-620.100(2)(o), F.A.C., due to the existence of a condition of no exposure.

A condition of no exposure exists at an industrial facility when all industrial materials and activities are protected by a storm resistant shelter to prevent exposure to precipitation and/or runoff. Industrial materials or activities include, but are not limited to, material handling equipment or activities, industrial machinery, raw materials, intermediate products, by-products, final products or waste products. Material handling activities include the storage, loading and unloading, transportation or conveyance of any raw material, intermediate product, final product or waste product. A storm resistant shelter is not required for the following industrial materials and activities:

- drums, barrels, tanks and similar containers that are tightly sealed, provided those containers are not deteriorated and do not leak. "Scaled" means banded or otherwise secured and without operational taps or valves;
- adequately maintained vehicles used in material handling; and
- final products, other than products that would be mobilized in stormwater discharges (e.g., rock salt).

A No Exposure Certification must be provided for each facility qualifying for the no exposure exclusion. In addition, the exclusion from permitting is available on a facility-wide basis only and not for individual outfalls. If any industrial activities or materials are or will be exposed to precipitation, the facility is not eligible for the no exposure exclusion.

By signing and submitting this No Exposure Certification form, the entity in Section II is certifying that a condition of no exposure exists at its facility or site and is obligated to comply with the terms and conditions of 62-620.100(2)(o), F.A.C.

ALL INFORMATION MUST BE PROVIDED ON THIS FORM.

Detailed instructions for completing this form and obtaining the No Exposure exclusion are provided on pages 5-7.

I. IDENTIFICATION NUMBER:

Facility ID: FLR & & & 1998&2

II. APPLICANT INFORMATION:

A. Operator Name: Ed Juniey		B. Operator Status: P
C. Address: 1650 Hemlock Street		
D. City: Tamp	E. State: FL	F. Zip Code: 33605
G. Responsible Authority: Ed Kinhey		
H. Responsible Authority's Phone No.: (813) 241- 9206	ext 183	
	1	

DEP Form 62-620.910(17) Effective February 17, 2009

I. Responsible Authority's Fax No.: (813) 241-9215	
J. Responsible Authority's E-mail Address: etipleye UEStampu. com	

III. FACILITY/SITE LOCATION INFORMATION:

A. Facility Name: Universal Environmental Solutions, LLC.				
B. Street Address: 1650 Hemlock Street				
C. City: Tompon		D. State: FL	E. Zip Code: 33605	
F. County: Hills brough	G. Latitude; 12 " 56 ' 17 "	Long	itude: 182° 26' 28"	
	dian Country Lands? 🔲 Yes 🛛 No	I. Water M	anagement District: SWF WMD	
J. Facility Contact: Ed K	integ			
K. Facility Contact's Phone N		+ 183		
L. Facility Contact's Fax No.:	(813) 241-9215			
M. Facility Contact's E-mail Address: e kinley & UEStamper, COM				

IV. FACILITY ACTIVITY INFORMATION:

A. SIC or Designated Activity Code(s):	Primary:	324191	Secondary:	5(2910
B. Total size of site associated with industr	rial activity: _	1.29	acres	
C. Has a roof or pavement been installed o exclusion?	ver a formerly	exposed pervious	area in order to qua	lify for the no exposure
D. If yes, indicate approximately how muc the applicant from the no exposure exclusion	h area was pa on.	ved or roofed over.	Completing this q	uestion does not disqualify
Less than 1,000 square feet	1,000	square feet to one	acre More	than one acre

DEP Form 62-620.910(17) Effective February 17, 2009

V. EXPOSURE CHECKLIST:

Are any of the following materials or activities exposed to precipitation, now or in the foreseeable future? (Please check either "Yes" or "No" in the appropriate box.) If you answer "Yes" to any of these questions (1) through (11), you are <u>not</u> eligible for the no exposure exclusion.		
1.	Using, storing or cleaning industrial machinery or equipment and areas where residuals from using, storing or cleaning industrial machinery or equipment remain and are exposed to stormwater.	Yes X No
2.	Materials or residuals on the ground or in stormwater inlets from spills/leaks.	Yes No
3.	Materials or products from past industrial activity.	□ Yes 🖾 No
4.	Material handling equipment (except adequately maintained vehicles).	TYes No
5.	Materials or products during loading, unloading or transporting activities.	Yes X No
6.	Materials or products stored outdoors [except final products intended for outside use (e.g., new cars) where exposure to storm water does not result in the discharge of pollutants].	🗌 Yes 🔀 No
7.	Materials contained in open, deteriorated or leaking storage drums, barrels, tanks and similar containers.	🗌 Yes 🔀 No
8.	Materials or products handled or stored on roads or railways owned or maintained by the discharger.	🗌 Yes 🔀 No
9.	Waste material [except waste in covered, non-leaking containers (e.g., dumpsters)].	🗌 Yes 🔀 No
10.	Application or disposal of process wastewater (unless otherwise permitted).	🗌 Yes 🔀 No
11.	Particulate matter or visible deposits of residuals from roof stacks and/or vents not otherwise regulated (i.e., under an air quality control permit) and evident in the stormwater outflow.	🗌 Yes 🔀 No

DEP Form 62-620.910(17) Effective February 17, 2009

VI. CERTIFICATION¹:

I certify under penalty of law that I have read and understand the eligibility requirements as set out in 62-620.100(2)(o), F.A.C., and this form, for claiming a condition of "no exposure" and obtaining an exclusion from NPDES stormwater permitting.

I certify under penalty of law that there are no discharges of stormwater contaminated by exposure to industrial activities or materials from the industrial facility or site identified in this document [except as allowed under paragraph 62-620.100(2)(o)].

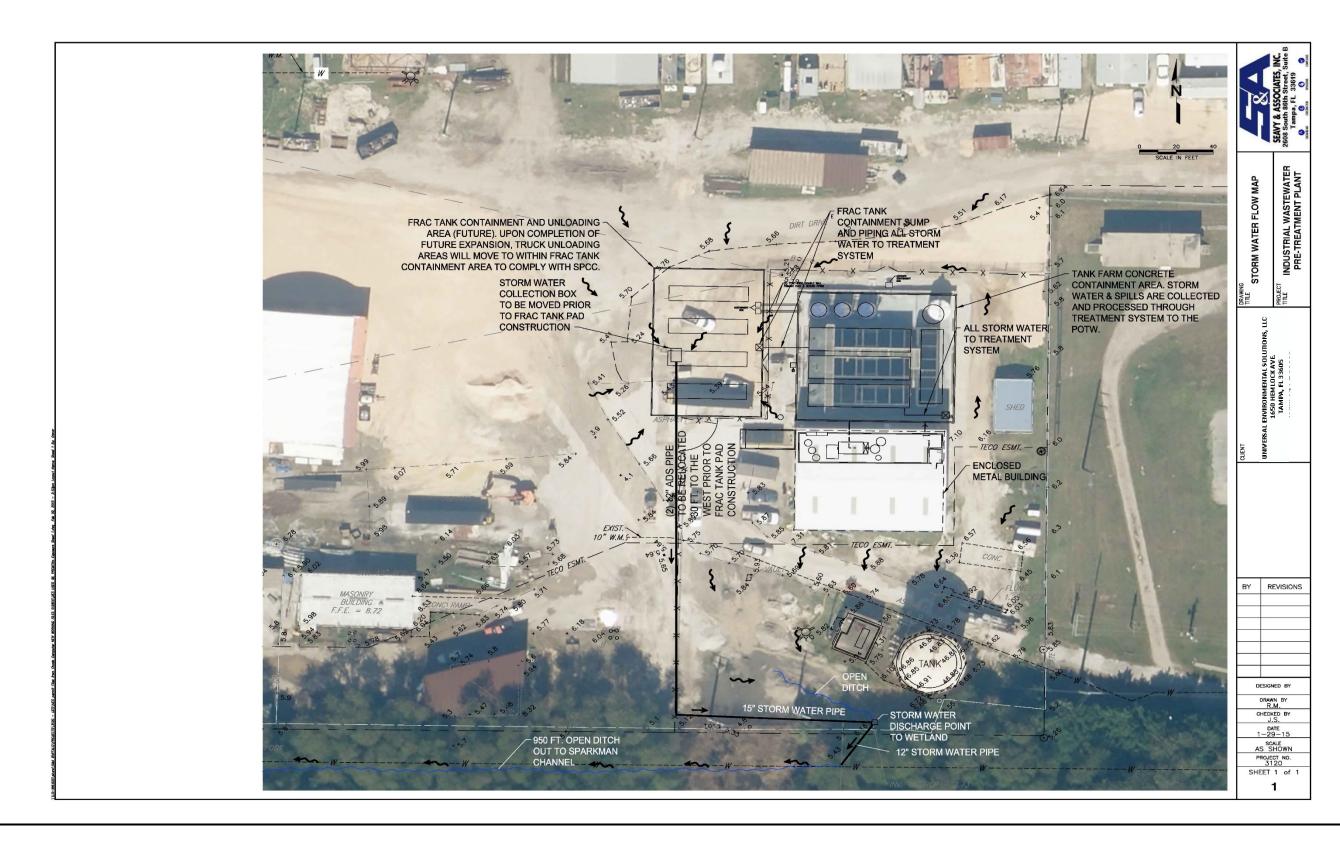
I understand that I am obligated to submit a no exposure certification form once every five years to the Department of Environmental Protection and to the operator of the local municipal separate storm sewer system (MS4) into which the facility discharges (where applicable). I understand that I must allow the Department of Environmental Protection, or MS4 operator where the discharge is into the local MS4, to perform inspections to confirm the condition of no exposure. I understand that I must obtain coverage under a permit authorized by 403.0885, F.S. prior to any point source discharge of stormwater associated with industrial activity from the facility or at any such time I anticipate that the conditions of no exposure shall no longer apply to the facility. I further understand that the Department may determine that stormwater discharge from the facility is the cause of, or contributes to, a violation of an applicable water quality standard, including designated use, and require that I obtain a permit for the discharge at which time I would no longer be eligible for the no exposure exclusion.

Additionally, 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 submitted is to the best of my knowledge and belief true, accurate and complete. <u>I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.</u>

Responsible Authority Name and Official Title (Type or Print): ED KINLEY (Prisident)	
E. K L.	10116 2014
Responsible Authority Signature:	Date Signed:

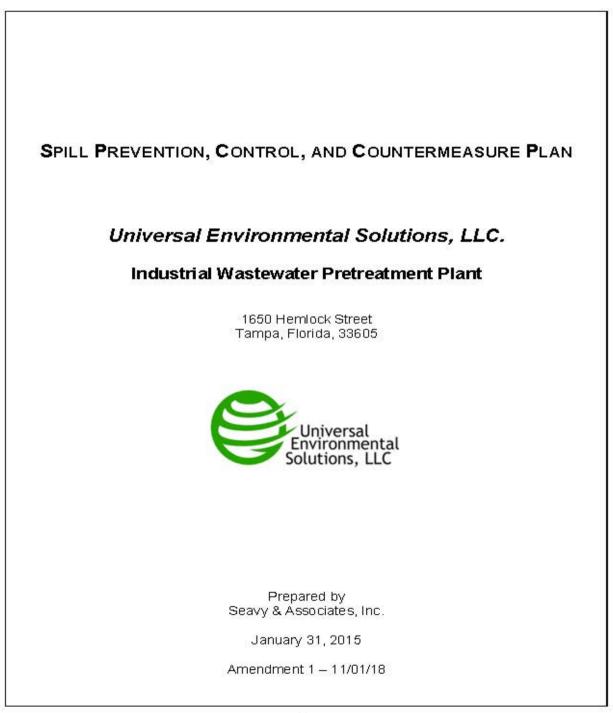
¹ Signatory requirements are contained in Rule 62-620.305, F.A.C.

DEP Form 62-620.910(17) Effective February 17, 2009



ATTACHMENT 8 – CONTINGENCY PLAN / SPCC PLAN

Revision 3 Modifications Updated for modifications. Revision 4 Table 3-1 has been updated to include frac tanks



Universal Environmental Solutions, LLC Industrial Wastewater Pretreatment Facility	Spill Prevention, Control, and Countermeasure (SPCC) Plan
Table of Cont	ents
	Page
TOC	Ĩ
Cross-Reference	3
Introduction	4
Management Approval (40 CFR 112.7)	5
Professional Engineer Certification (40 CFR 112.3(d))	5
Location of SPCC Plan (40 CFR 112.3(e))	6
Plan Review (40 CFR 112.3 and 112.5)	6
Part I - General Facility Information (40 CFR 112.7(a)(3))	
1.1 Company Information	7
1.2 Contact Information	7
1.3 Facility Description (40 CFR 112.7(a)(3))	8
1.3.1 Facility Location	8
1.3.2 Facility Operations	8
1.3.3 Oil and Fuel Storage and Handling	8
1.3.4 Transfer Activities	10
1.3.5 Facilities, Procedures, Methods of Equipment Not Yet	Fully Operational 10

	1723		
126	Drovimity to	Novigoblo	1A/atore

1.3.6 Proximity to Navigable Waters	11
1,3,7 Conformance with Applicable State and Local Requirements	11
Part II - Spill Response and Reporting (40 CFR 112.7)	
2.1 Discharge Discovery and Reporting (112.7(a)(3))	12

2.1.1 Spill Reporting (40 CFR 112.7(a)(4))	12
2.1.2 Submission of SPCC Information	13
2.2 Spill Response Materials	14
2.3 Spill Mitigation Procedures	14
2.3.1 Shut Off Ignition Sources	14
2.3.2 Stop Oil Flow	14
2.3.3 Stop the Spread and Call the Field Operations Manager	15
2.3.4 Gather Spill Information	15
2.3.5 Notify Agencies Verbally	15
2.4 Disposal Plan	15
Part III - Spill Prevention, Control, and Countermeasure Provisions (40 CFR 112.7 and 112.9)	

3.1 Potenti	al Discharge Volume and Direction of Flow (40 CFR 112.7(b)	17
and	Containment (40 CFR 112.7(a)(3)(iii)	
3.2 Contair	nment and Diversionary Structures (40 CFR 112.7(c) and 112.7(a)(3)(iii)	18
3.2.1 B	ulk Storage Tank Containment	18
3.2.2 L	oading and Unloading Area Containment	18
3.2.3 V	/astewater Treatment Facility Containment	18

Universal Environmental Solutions, LLC. Industrial Wastewater Pretreatment Facility	Spill Prevention, Control, and Countermeasure (SPCC) Plan
	Pa
3.2.4 Secondary Containment Calculations	
3.2.5 Practicality of Secondary Containment (40 CFR 112.7(d))	
3.3 Inspections, Tests, and Records (40 CFR 112.7(e))	
3.3.1 Daily Examinations	
3.3.2 Monthly Inspections	
3.4 Brittle Fracture Evaluations (40 CFR 112.7(i))	
3.5 Security (40 CFR 112.7(g))	
3.6 Personnel, Training, and Discharge Prevention Procedures (40 CFR	112.7(f))
3.6.1 Spill Prevention Briefing	
List of Tables	
Table 1-1: Facility contact information	
Table 1-2: Characteristics of oil containers	
Table 3-1: Potential discharge volume and direction of flow	
Table 3-2: Berm capacity calculations	
List of Figures	
Figure 1-1: Site plan.	
Figure 1-2: Tank Location Plan	
Figure 2-1: Stormwater Flow and Spill/Emergency Kit Location Plan	
Appendix A – Certification of Substantial Harm Determination	
Appendix B – Monthly and Annual Inspection Checklist Procedure	
Appendix C - Monthly Inspection Checklist	
Appendix D – SPCC Plan Amendments and Recertification Log	
Appendix E - Discharge Prevention Briefing Log	
Appendix F - Discharge Notification Procedures and Form	
Appendix G - Equipment Shut-off Procedures	
Appendix H - Written Commitment of Manpower, Equipment, and Materials	
Appendix I - Oil Spill Contingency Plan	

Universal Environmental Solutions, LLC. Industrial Wastewater Pretreatment Facility Spill Prevention, Control, and Countermeasure (SPCC) Plan

Cross-Reference with SPCC Rule

Provision*	Plan Section	Page(s)
112.3(d)	Professional Engineer Certification	6
112.3(e)	Location of SPCC Plan	7
112.5	Plan Review	7
112.7	Management Approval	6
112.7	Cross-Reference with SPCC Rule	4
112.7(a)(3)	Part I - General Information and Facility Diagram Appendix A: Facility Diagrams	9-12 Appendix A
112.4 and 112.7(a)(4)	2.1 Discharge Discovery and Reporting Appendix F: Discharge Notification	13-15 Appendix F
112.7(a)(5)	2.2 Spill Mitigation Procedures Appendix I: Oil Spill Contingency Plan	15-16 Appendix I
112.7(b)	3.1 Potential Discharge Volume and Direction of Flow	18-19
112.7(c)	3.2 Containment and Diversionary Structures	19-21
112.7(d)	3.2.3 Practicability of Secondary Containment Appendix H: Written Commitment of manpower, equipment, and materials Appendix I: Oil Spill Contingency Plan	21 Appendix H Appendix I
112.7(e)	3.4 Inspections, Tests, and Records Appendix C: Facility Inspection Checklists	23-26 Appendix C
112.7(f)	3.5 Personnel, Training, and Discharge Prevention Procedures Appendix E: Discharge Prevention Briefing Log	27-29 Appendix E
112.7(g)	Security – N/A (does not apply to production facilities)	N/A
112.7(h)	Loading/Unloading Rack – N/A (no rack present at this facility)	N/A
112.7(i)	Brittle Fracture Evaluation – N/A (no field-erected aboveground tank at this facility)	26
112.7(j)	1.7 Conformance with Applicable State and Local Requirements	12
112.9(b)	3.2.1 Oil Production Facility Drainage Appendix D: Record of Dike Drainage	20 Appendix D
112.9(c)(1)	1.5.1 Production Equipment	11
112.9(c)(2)	3.2.2 Secondary Containment for Bulk Storage Containers	19-21
112.9(c)(3)	3.4 Inspections, Tests, and Records Appendix C: Monthly Inspection Checklist	23-26 Appendix C
112.9(c)(4)	3.3.1 Bulk Storage Containers Overflow Prevention	22
112.9(d)(1)	3.3.2 Transfer Operations and Saltwater Disposal System	22-23
112.9(d)(2)	3.3.2 Transfer Operations and Saltwater Disposal System	22-23
112.9(d)(3)	3.4.5 Flowline Maintenance Program	26-27

* Only relevant rule provisions are indicated. For a complete list of SPCC requirements, refer to the full text of 40 CFR part 112.

Universal Environmental Solutions, LLC.	Spill Prevention, Control, and
Industrial Wastewater Pretreatment Facility	Countermeasure (SPCC) Plan

Introduction

The purpose of this Spill Prevention Control and Countermeasure (SPCC) Plan is to describe measures implemented by Universal Environmental Solutions, LLC (UES) to prevent oil discharges from occurring, and to prepare to respond in a safe, effective, and timely manner to mitigate the impacts of a discharge from the industrial wastewater pretreatment facility. This SPCC Plan has been prepared and implemented in accordance with the SPCC requirements contained in 40 CFR part 112.

In addition to fulfilling requirements of 40 CFR part 112, this SPCC Plan is used as a reference for oil storage information and testing records, as a tool to communicate practices on preventing and responding to discharges with Clearwater employees and contractors, as a guide on facility inspections, and as a resource during emergency response.

UES management has determined that this facility does not pose a risk of substantial harm under 40 CFR part 112, as recorded in the "Substantial Harm Determination" included in Appendix A of this Plan.

This Plan provides guidance on key actions that UES must perform to comply with the SPCC rule:

- Complete monthly and annual site inspections using the inspection checklists provided in Appendix B (Inspection, Tests, and Records).
- Perform preventive maintenance of equipment, secondary containment systems, and discharge prevention systems described in this Plan as needed to keep them and discharge prevention systems described in proper operating conditions
- Conduct annual employee training and document them on the as outlined in the Personnel, Training, and Spill Prevention Procedures Log provided in Appendix C.
- If either of the following occurs, submit the SPCC Plan to the EPA Region 4 and the Florida Department of Environmental Protection (FDEP) along with other information as described in this plan.
 - The facility discharges more than 1,000 gallons of oil into or upon the navigable waters of the U.S. or adjoining shorelines in a single spill event;
 - o Or
- The facility discharges oil in quantity greater than 42 gallons in each of two spill events within any 12-month period

Attachment 8 **Revision 4** Page 100

Universal Environmental Solutions. LLC. Industrial Wastewater Pretreatment Facility

Spill Prevention. Control. and Countermeasure (SPCC) Plan

Plan Administration

Management Approval and Designated Person (40 CFR 112.7)

UES is committed to maintaining the highest standards for preventing discharges of oil to navigable waters and the environment through the implementation of this SPCC Plan. This SPCC Plan has the full approval of UES management. UES management has committed the necessary resources to implement the measures described in this Plan.

Ed Kinley is the Designated Person Accountable for Oil Spill Prevention at this UES facility and has the authority to commit the necessary resources to implement the Plan as described.

Authorized Facility Representative:

Ed Kinley

Signature:

Title: Date:

President

February 19, 2019

Professional Engineer Certification (40 CFR 112.3(d))

The undersigned Registered Professional Engineer is familiar with the requirements of Part 112 of Title 40 of the Code of Federal Regulations (40 CFR part 112) and has visited and examined the facility or has supervised examination of the facility by appropriately qualified personnel. The undersigned Registered Professional Engineer attests that this Spill Prevention, Control, and Countermeasure Plan has been prepared in accordance -with good engineering practice, including consideration of applicable industry standards and the requirements of 40 CFR part 112; that procedures for required inspections and testing have been established; and that this Plan is adequate for the facility. [112.3(d)]

This certification in no way relieves the owner or operator of the facility of his/her duty to prepare and fully implement this SPCC Plan in accordance -with the requirements of 40 CFR part 112.

> Michael Keith Coats Florida P.E. 48917 Austin Construction Group, Inc. 1302 N 23rd Street Tampa, FL 33605 813-917-9267 Certificate of Authorization# 30178

Date: Signature

Universal Environmental Solutions, LLC.	Spill Prevention, Control, and
Industrial Wastewater Pretreatment Facility	Countermeasure (SPCC) Plan

Location of SPCC Plan (40 CFR 112.3(e))

In accordance with 40 CFR 112.3(e), a complete copy of this SPCC Plan is maintained at the facility in the UES office building open from 7:00 AM to 5:00 PM, 5 days per week (closed on Saturdays and Sundays). A field copy is maintained in the treatment plant laboratory office for quick reference.

Plan Review (40 CFR 112.3 and 112.5)

In accordance with 40 CFR 112.5(a), UES periodically reviews and evaluates this SPCC Plan for any change in the facility design, construction, operation, or maintenance that materially affects the facility's potential for an oil discharge, including, but not limited to:

- commissioning of containers;
- > reconstruction, replacement, or installation of piping systems;
- > construction or demolition that might alter secondary containment structures; or
- changes of product or service, revisions to standard operation, modification of testing/inspection procedures, and use of new or modified industry standards or maintenance procedures.

Amendments to the Plan made to address changes of this nature are referred to as technical amendments and must be certified by a PE. Non-technical amendments can be done (and must be documented in this section) by the facility owner and/or operator. Non-technical amendments include the following:

- change in the name or contact information (i.e., telephone numbers) of individuals responsible for the implementation of this Plan; or
- > change in the name or contact information of spill response or cleanup contractors.

UES must make the needed revisions to the SPCC Plan as soon as possible, but no later than six months after the change occurs. The Plan must be implemented as soon as possible following any technical amendment, but *no later than six months* from the date of the amendment. The Facility Manager is responsible for initiating and coordinating revisions to the SPCC Plan.

Appendix D includes the SPCC Certification Log. This log must be completed even if no amendment is made to the Plan as a result of the review. Unless a technical or administrative change prompts an earlier review of the Plan, the next scheduled review of this Plan must occur by January 30, 2019

Universal Environmental Solutions, LLC. Industrial Wastewater Pretreatment Facility Spill Prevention, Control, and Countermeasure (SPCC) Plan

PART I - GENERAL FACILITY INFORMATION 40 CFR 112.7(a)(3)

1.1 Company Information

Name of Facility:	Universal Environmental Solutions, LLC Industrial Wastewater Pretreatment Facility
Туре	Onshore oil production facility
Date of Initial Operation	March 2014
Location	1650 Hemlock Street, Tampa, Florida, 33605
Facility Contact	Ed Kinley, VP Office 813-241-9206 Cell 813-390-0659
Facility Capacity	The facility has a maximum daily onsite capacity of 285,000 gallons of preprocess wastewater, recovered waste oils, and used and virgin fuels.
Hours of Operation	The UES facility operates Monday through Friday (weekends on occasion), 10 hours per day.

1.2 Contact Information

The designated person accountable for overall oil spill prevention and response at the facility, also referred to as the facility's "Response Coordinator" (RC), is the President, Ed Kinley. 24-hour contact information is provided in Table 1-1.

Name	Title	Telephone	Address
Ed Kinley	President/Response Coordinator	(813) 241-9206 (office)	1650 Hemlock Street
	Universal Environmental Solutions	(813) 390-0659 (cell)	Tampa, Florida 33605
Brian Russel	Facility Operation Manager	(813) 241-9206 (office)	1650 Hemlock Street
	Universal Environmental Solutions	(813) 406-9835 (cell)	Tampa, Florida 33605
Joe Cimino	Vice President	(813) 241-9206 (office)	1650 Hemlock Street
	Hendry Corporation	(813) 690-5998 (cell)	Tampa, Florida 33605
24-Hour Security		(813) 241-9206 (office) (813) 422-9153 (cell)	1650 Hemlock Street Tampa, Florida 33605

Table 1-1: Facilit	Contact Information
Tuble 1 1. Tuomit	oondot mionnation

Universal Environmental Solutions, LLC.	Spill Prevention, Control, and
Industrial Wastewater Pretreatment Facility	Countermeasure (SPCC) Plan

1.3 Facility Description (40 CFR 112.7(a)(3))

1.3.1 Facility Location

UES operates and industrial wastewater pretreatment plant on the south eastern portion Hendry Corporation's ship repair facility located in Tampa, Florida. As shown in Figure 1-1, the Hendry facility operates at Berths 247 and 248 in Port Ybor, on the east side of the Sparkman Channel. Gulf Marine Repair operated a ship repair facility to the north, A TECO substation is located along the south east, CSX operates a switch yard to the east, and Vulcan material operates a cement facility to the south. The Hendry facility is separated by the Vulcan facility by a security fence and a stormwater drainage ditch that runs the length of the property border between Vulcan and Gulf Marine. This stormwater drainage ditch flows to the west discharging into Sparkman Channel. Any release from the facility that enters this drainage ditch has the potential to reach the Sparkman Channel, a navigable waterway. All stormwater from the UES facility that does not percolated into the ground is routed to this ditch. Due to the facility's close proximity to the Sparkman Channel, the facility could reasonably be expected to discharge oil in harmful quantities into navigable waters of the United States.

1.3.2 Facility Operations

The UES pretreatment facility is permitted to accept Non-Hazardous Wastewater (Subcategory D, Clean Water Act, multiple waste streams subcategory and discharge pretreated effluent to the sanitary sewer in accordance with the facility's City of Tampa Discharge Permit (Permit # 1112). Waste oil is generated primarily from the treatment of bilge water. Waste and virgin fuel are generated from removal from vessels prior to ship repair operations by Hendy, Gulf Marine Repair, and other local ship repair facilities. Both waste oils and fuels and accumulated in tanks located within secondary containment prior to off-site recycling by local waste oil and fuel recycling facilities.

The UES facility is comprised of an estimates 4,890 square foot building housing an inside pretreatment process system, a concrete containment area adjacent to the building, and a truck unloading area to the west and north of the containment pad; and a double walled pipeline to transfer bilge water from Berth 247 to the treatment. The industrial wastewater treatment process components are located inside a metal building and includes a diffused air flotation (DAF) system and seven tanks used for chemical mixing and wastewater treatment. The DAF and seven chemical mixing tanks are situated within a secondary containment capable of housing 110 percent (%) of the largest tank.

1.3.3 Oil and Fuel Storage and Handling

Waste oil and fuels are stored in above ground storage tanks (ASTs) that contain various preprocess and post process wastewater, oils, and fuels. The tanks are located within a concrete secondary containment area on the north side of the pre-treatment building. This secondary containment is a zero-discharge containment system with no drainage system for stormwater. All stormwater or potential spills into the containment drain to a sump located in the southeastern corner of the containment structure and are pumped back into the pre-process wastewater tanks for treatment. **Table 1-2** lists all oil containers present at the facility with capacity of 55 gallons or more. The capacities of oil containers present at the site are listed below and are also indicated on the facility diagram in Figure 1-2.

Universal Environmental Solutions, LLC.	Spill Prevention, Control, and
Industrial Wastewater Pretreatment Facility	Countermeasure (SPCC) Plan

Table 1-2: Characteristics of Containers

Tank ID #	Tank Type	Pre-Update Process Use	Post-Update Process Use	Containment Area	Name / Primary Content / Purpose	Capacity (Barrels)	Capacity (Gals)
1	Steel	New	OWS/DAF	Offloading	Open topped steel box for oily water	12	500
				Pad	offloading gross filtration.		
2	Steel	New	OWS/DAF	Offloading Pad	Open topped steel box for oily water	12	500
3	Charl	News			offloading gross filtration.	477	20.000
3	Steel	New	OWS/DAF	Offloading Pad	Frac Tank 1 / Oily water clarification and storage prior to OWS/DAF separation.	477	20,000
4	Steel	New	OWS/DAF	Offloading	Frac Tank 2 / Oily water clarification and	477	20,000
4	Steel	New	OWS/DAF	Pad	storage prior to OWS/DAF separation.	4//	20,000
5	Steel	New	OWS/DAF	Offloading	Frac Tank 3 / Oily water clarification and	477	20,000
5	Steel	New	OWS/DAF	Pad	storage prior to OWS/DAF separation.	4//	20,000
6	Steel	New	RO Thermal	Offloading	Frac Tank 4 / Recycled oil storage final	477	20,000
0	Steel	New	Treatment	Pad	settling & clarification prior to shipment.	477	20,000
7	Steel	OWS/DAF	OWS/DAF	Tank	Oily bilge water separator tank 1 / Oily bilge	1,646	69,115
	Steel	010,011	0110/0/11	Farm	water gravity separation.	1,040	00,110
8	Steel	OWS/DAF	OWS/DAF	Tank	Oily bilge water separator tank 2 / Oily bilge	1,646	69,115
	0.000	0110,074	0110/07	Farm	water open topped gravity separation tank.	2,010	00,110
9	Steel	OWS/DAF	RO Thermal	Tank	Post processed oil storage and thermal	1,646	69,115
		0110/0/1	Treatment	Farm	treatment closed topped square tank.	1,010	00,110
10	Steel	OWS/DAF	Wastewater	Tank	Wastewater polishing tank 1. Post processed	1,646	60,318
10	Steel	OW5/DAI	Clarification	Farm	wastewater pointing tank 1. Post processed wastewater storage and clarification.	1,040	00,510
11	Steel	Temp Fuel	Temp Fuel	Tank	Diesel storage tank 1 / Temporary storage of	120	5,000
11	Steel	Storage	Storage	Farm	virgin diesel prior to recycling.	120	3,000
12	Steel	Temp Fuel	Temp Fuel	Tank	Diesel storage tank 2 / Temporary storage of	120	5,000
12	Jucci	Storage	Storage	Farm	virgin diesel prior to recycling.	120	3,000
13	Steel	Temp Fuel	Temp Fuel	Tank	Gasoline storage tank 1 / Temporary storage	120	5,000
10	Jucci	Storage	Storage	Farm	of virgin gasoline prior to recycling.	120	3,000
14	Poly	OWS/DAF	Wastewater	Tank	Final wastewater settling tank 1. / Hydroxide	240	10,000
14	1 01,9	OWSIDA	Clarification.	Farm	precipitation settling tank.	240	10,000
15	Poly	New	Wastewater	Tank	Conical bottom tank 1. Ionic exchange	24	1,000
13	,	INC. W	Clarification	Farm	supernate containment tank.	27	1,000
16	Poly	New	Wastewater	Tank	Round tank with removable lid. Water	2.5	100
10	,	INCOV	Clarification	Farm	softener mixing tank	2.5	100
17	Poly	New	Wastewater	Tank	Wastewater precipitation Sodium Hydroxide	24	1,000
17	10.9	INCOV	Clarification	Farm	storage tank.	24	1,000
18	Poly	New	Wastewater	Tank	Wastewater precipitation Sulfuric Acid	24	1,000
10	,	140.44	Clarification	Farm	storage tank.	24	1,000
19	Steel	New	Oil Thermal	Containment	Conical bottom steam settling tank. Boiler	2	80
10	Steel	IVC W	Treatment	Not Required	steam condensate.	2	00
20	Poly	OWS/DAF	OWS/DAF	Inside Bldg.	DAF Sodium Hydroxide storage tank.	24	1,000
20	,	0110/0/1	010,011	maide blug.	by a bound in the bound of the	27	1,000
21	Poly	OWS/DAF	OWS/DAF	Inside Bldg.	DAF Flocculant storage tank.	24	1,000
22	Poly	OWS/DAF	OWS/DAF	Inside Bldg.	DAF Coagulant storage tank.	24	1,000
23	Poly	OWS/DAF	OWS/DAF	Inside Bldg.	DAF Separated wastewater tank.	48	1,200
24	Poly	OWS/DAF	OWS/DAF	Inside Bldg.	DAF separated oil collection tank.	48	1,200
280-00	15. 38900 ·	and an end a second		Denessioner utstanden			
25	Steel	OWS/DAF	OWS/DAF	Inside Bldg.	DAF Sludge collection and settling tank.	24	1,000
26	Steel	OWS/DAF	OWS/DAF	Inside Bldg.	Open topped square cone bottom tank for wastewater coarse sand filtration.	18	750
27	Steel	OWS/DAF	OWS/DAF	Inside Bldg.	Open topped square cone bottom tank for wastewater fine sand filtration.	18	750
Poly=	l Polyethyle	I ne tank not used	l for oily water or o	l pil storage.		0.420.5	
					CAPACITY TOTALS	9,420.5	384,74

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Industrial Wastewater Pretreatment Facility	Countermeasure (SPCC) Plan

1.3.4 Transfer Activities

Figure 1-3 presents the location of the loading and unloading area as well as all process and transfer piping. The loading and unloading area(s) for tank trucks provides a connection box to capture hose connect / disconnect spills. The connection box / manifolds are fitted with two flanges which are capped. The connection box / manifolds are covered with a hinged lid to prevent rainfall accumulation. Any noticeable free liquids accumulated in the box is absorbed by the plant operator in the daily / routine maintenance. All unloading activities are supervised by pre-treatment plant personnel. In the event of a hose failure by a delivery tank truck, the valve from the truck is immediately closed. Any spill residue will be absorbed by spill kits at the facility. Under this scenario less than 25 gallons will spill. An incident that will be managed internally and not require notification.

A doubled walled underground pipe carries the bilge oily water from the Berth 247 to the oily bilge water transfer containment box located near west wall of the containment area. The doubled walled pipeline is 800' feet long and is a 6-inch inner pipe diameter and 10-inch outer pipe diameter double walled welded high-density polyethylene (HDPE). The HDPE pipes are contained inside a 15-inch abandoned storm water pipe that has been repurposed to contain the potential leaks within the pipeline. Temporary transfer piping is connected to the doubled walled subgrade piping at Berth 247. The pipeline at Berth 247 has a check valve and hand valve that prevents backflow of liquids from the facility to Berth 247. Two secondary pipe leak alarms are installed in the interstitial space between the primary and secondary piping. The alarm is integrated into the onsite PLC. An audio and visual indicator alarms system will alert the plant operator in the event of a primary pipe leak. Figure 1-2 depicts the location of the pipeline connections at Berth 247, pipeline and tank pad containment area transfer containment box location and alarm locations.

1.3.5 Facilities, Procedures, Methods (40 CFR 112.7)

This section discusses two plant upgrade projects currently scheduled for construction by March 2015. These projects include construction of a secondary containment pad for frac tank storage and unloading operations; and retrofit of a former water storage tank and installation of pumps, piping and secondary containment for storage and treatment of landfill leachate. Upon completion of these projects, the upgrades will be inspected by a professional engineer and the plan will be recertified using the SPCC Certification Log included in Appendix D.

Offloading/Onloading Containment Pad

The facility receives Bilge Oily Waters and depending on the facility's available storage space may temporarily store the wastewater in 20,000-gallon mobile frac tanks. The frac tanks are temporary staged on the west side of the tank farm for unloaded into one of two 69,000-gallon steel above ground storage tanks used to store raw wastewater prior to treatment (pre-process tanks). The frac tank contents are pumped into the pre-process connection box for transfer into the pre-process tanks.

While the wastewater in the frac tanks contains only residual amounts of petroleum products, UES has designed and has constructed an 84 feet by 63 feet by 0.8 feet concrete containment pad with sufficient volume to hold four 20,000-gallon frac tank for future expansion. Stormwater or potential spills will be routed to a sump located within the

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Industrial Wastewater Pretreatment Facility	Countermeasure (SPCC) Plan		

containment area. All stormwater will be pumped into the pre-process tanks. UES does not have a means to drain stormwater from any of the containment areas but instead treats all stormwater collected in the containment area. All piping within the offloading pad will be contained within the containment area. Figure 1-2 shows the extent and layout of the offloading pad containment area and piping layout.

1.3.6 Proximity to Navigable Waters

Figure 2-4 (Facility Drainage Map) shows the location of the facility relative to nearby waterways. The facility is located approximately 800 feet west of Sparkman Channel, a dredged channel maintained by Port Tampa Bay. The facility is located on relatively level terrain. With the exception of grassy areas to the south and east of the facility, the majority of the site is built on crushed concrete base. All stormwater or potential spills will either percolate into the ground; flow to the south to an open ditch on the south side of the facility. The stormwater grate inlet flows to the open ditch on the south of the facility via 2 X12-inch stormwater piping. Stormwater that is routed to the open ditch drains off-site via a 2 X 12-inch stormwater pipe that leads to an off-site open ditch that flows approximately 900 feet to the west, eventually discharging into the Sparkman Channel. In the event of a spill or release, UES is prepared to block off-site drainage from the 12-inch storm pipe.

1.3.7 Conformance with Applicable State and Local Requirements [112.7(j)]

The SPCC regulation at 40 CFR part 112 is more stringent than requirements from the state of Florida for this type of facility. This SPCC Plan was written to conform with 40 CFR part 112 requirements. The facility thereby conforms with general requirements for oil pollution facilities in Florida. All discharge notifications are made in compliance with local, state, and federal requirements. Universal Environmental Solutions, LLC. Industrial Wastewater Pretreatment Facility Spill Prevention, Control, and Countermeasure (SPCC) Plan

PART II - SPILL RESPONSE AND REPORTING 40 CFR 112.7

2.1 Discharge Discovery and Reporting [112.7(a)(3)]

Several individuals and organizations must be contacted in the event of an oil discharge. The Field Operations Manager is responsible for ensuring that all required discharge notifications have been made. All discharges should be reported to the Response Coordinator. This section provides a list of agencies to be contacted under different circumstances as well as information to be obtained for reporting and documenting a release. Appendix E includes a Discharge Reporting Log Form to be used for collection of this information.

If emergency medical services are necessary, immediately notify 911 and stabilize the injured person prior to performing spill response actions.

A reportable spill includes a petroleum product release to an impervious surface in an amount greater than 100 gallons and/or to a pervious surface in an amount greater than 25 gallons and/or <u>discharge</u>" as defined in 62 FAC 780.200, a report must be made to the local county Environmental Management Department within 24 hours of the classification determination. A blank Discharge Report Form is provided as Appendix E.

2.1.1Spill Reporting (40 CFR 112.7(a)(4))

If spilled petroleum product has been released to an impervious surface in an amount less than 100 gallons and/or to a pervious surface in an amount less than 25 gallons and/or did not create sheen on surface water, immediately notify:

> ED Kinley - (813) 390-0659.

If spilled petroleum product has been released to an impervious surface in an amount greater than 100 gallons and/or to a pervious surface in an amount greater than 25 gallons and/or created sheen on surface water, immediately notify the following contacts listed below and prepare the applicable reports listed in subsection D. <u>The State Warning Point will not be required to be notified if the spill is classified a "Deminimis discharge" as defined in 62 FAC 780.200.</u>

- Ed Kinley– Facility Operator Manager
- > State Warning Point

(813) 390-0659 (800) 320-0519 (w/n 24 hours)

If spilled petroleum product has been released offsite or into sewer inlets in any quantity immediately call the following contacts for advice regarding notifications and response actions:

- > UES (813) 241-9206
- SWS Environmental (813) 241-0282

Universal Environmental Solutions, LLC.	Spill Prevention, Control, and
Industrial Wastewater Pretreatment Facility	Countermeasure (SPCC) Plan

If spilled petroleum product has been released to an impervious surface in an amount greater than 100 gallons and/or to a pervious surface in an amount greater than 25 gallons and/or created sheen on surface water, immediately notify the following contacts listed below and prepare the applicable reports listed included in Appendix E.

The State Warning Point will not be required to be notified if the spill is classified a "Deminimis discharge" as defined in 62 FAC 780.200.

- Ed Kinley– Facility Operator/Owner/Manager
- State Warning Point
- National Response Center (NRC) 2100nd Street, SW Washington, DC 20593

Plan to provide the following information:

- The name, address and telephone number of the person making the telephone report;
- The date, time, and location of the spill or discharge;
- A specific description or identification of the oil, petroleum product, hazardous substances or other substances discharged or spilled;
- An estimate of the quantity discharged or spilled;
- The duration of the incident;
- The name of the surface water or a description of the waters in the state affected or threatened by the discharge or spill;
- □ The source of the discharge or spill;
- A description of the extent of actual or potential water pollution
- Harmful impacts to the environment and an identification of any
- Environmentally sensitive areas or natural resources at risk;
- □ If different from paragraph (1) of this subsection, the names, addresses, and telephone numbers of the responsible person and the contact
- Person at the location of the discharge or spill;
- A description of any actions that have been taken, are being taken, and will be taken to contain and respond to the discharge or spill;
- Any known or anticipated health risks;
- The identity of any governmental representatives, including local authorities or third parties, responding to the discharge or spill;
- Any other information that may be significant to the response action.

2.1.2 Submission of SPCC Information

Whenever the facility experiences a discharge into navigable waters of more than 1,000 gallons, or two discharges of 42 gallons or more within a 12-month period, Clearwater will provide information in writing to the EPA Region 6 office within 60 days of a qualifying discharge as described above. The required information is described in Appendix F of this SPCC Plan.

13

02/19/19

(813) 390-0659 (800) 320-0519 (w/n 24 hours) (800) 424-8802 (w/n 24 hours)

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Industrial Wastewater Pretreatment Facility	Countermeasure (SPCC) Plan

2.2 Spill Response Materials

Discuss locations and types of spill response equipment available. The facility has 6 spill kits located at various potential spill locations and frequent operations areas and 1 spill kit located at Berth 247 during cleaning activities. The spill kits contain the following items:

- (12) Gray 3" x 12" universal sorbent polypropylene socks
- (4) Gray 12" x 17" universal sorbent polypropylene pillows
- (60) Gray 16" x 18" universal sorbent polypropylene pads
- (10) Temporary disposal bags
- (1) Pair perforated vent frame safety goggles
- (1) Pair Nitrile gloves
- (1) Emergency Response Guidebook 18283 (14-ORS-2)
- (1) 55-gallon polyethylene drum with snap ring lid UN-Certified UN1H2/X250/S/00
- Shovel Large Snow Type and Spade Type
- Copy of the SPCC Plan

Figure 1-4 depicts spill kit locations and emergency response Health and Safety kits. Additional equipment and material are also kept at the field office. The inventory is checked monthly by UES operations personnel to ensure that used material is replenished.

2.3 Spill Mitigation Procedures

The following is a summary of actions that must be taken in the event of a discharge. It summarizes the distribution of responsibilities among individuals and describes procedures to follow in the event of a discharge.

A complete outline of actions to be performed in the event of a discharge reaching or threatening to reach navigable waters is included in the facility Contingency Plan. **Reminder:** In the event of a discharge facility personnel must immediately implement the Oil Spill Contingency Plan. The Oil Spill Contingency Plan discusses the additional procedures that must be followed to respond to a discharge of oil to navigable waters or adjoining shorelines.

In the event of a discharge, UES or contractor field personnel and the Field Operations Manager shall be responsible for the following:

2.3.1 Shut Off Ignition Sources

Field personnel must shut off all ignition sources, including motors, electrical circuits, and open flames.

2.3.2 Stop Oil Flow

Field personnel should determine the source of the discharge, and if safe to do so, immediately shut off the source of the discharge. Shut in the well(s) if necessary.

Universal Environmental Solutions, LLC.	Spill Prevention, Control, and
Industrial Wastewater Pretreatment Facility	Countermeasure (SPCC) Plan

2.3.3 Stop the Spread of Oil and Call the Field Operations Manager

If safe to do so, field personnel must use resources available at the facility (see spill response material and equipment listed in Section 2.3) to stop the spilled material from spreading. Measures that may be implemented, depending on the location and size of the discharge, include placing sorbent material or other barriers in the path of the discharge (e.g., sand bags), or constructing earthen berms or trenches.

In the event of a significant discharge, field personnel must immediately contact the Field Operations Manager, who may obtain assistance from authorized company contractors and direct the response and cleanup activities. Should a discharge reach Sparkman Channel, only physical response and countermeasures should be employed, such as the construction of underflow dams, installation of hard boom and sorbent boom, use of sorbent pads, and use of vacuum trucks to recover oil and oily water from the waterway. At no time shall any surfactants, dispersants, or other chemicals be used to remove oil from the channel.

2.3.4 Gather Spill Information

The Field Operations Manager will ensure that the *Discharge Notification Form* is filled out and that notifications have been made to the appropriate authorities. The Field Operations Manager may ask for assistance in gathering the spill information on the *Discharge Notification Form* (Appendix F) of this Plan

2.3.5 Notify Agencies Verbally

Some notifications must be completed *immediately* upon discovering the discharge. It is important to immediately contact the Field Operations Manager so that timely notifications can be made. If the Field Operations Manager is not available, or the Field Operations Manager requests it, field personnel must designate one person to begin notification. Section 2.1 of this Plan describes the required notifications to government agencies. The Field Operations Manager must also ensure that written notifications, if needed, are submitted to the appropriate agencies.

2.4 Disposal Plan

The cleanup contractor will handle the disposal of any recovered product, contaminated soil, contaminated materials and equipment, decontamination solutions, sorbents, and spent chemicals collected during a response to a discharge incident.

Any recovered product that can be recycled will be placed into the gun barrel tank to be separated and recycled. Any recovered product not deemed suitable for on-site recycling will be disposed of with the rest of the waste collected during the response efforts.

If the facility responds to a discharge without involvement of a cleanup contractor, UES will contract a licensed transportation/disposal company to dispose of waste according to regulatory requirements. The Field Operations Manager will characterize the waste and arrange for the use of certified waste containers.

All facility personnel handling hazardous wastes must have received both the initial 40-hour and annual 8-hour refresher training in the Hazardous Waste Operations and Emergency Response

Universal Environmental Solutions, LLC. Industrial Wastewater Pretreatment Facility Spill Prevention, Control, and Countermeasure (SPCC) Plan

Standard (HAZWOPER) of the Occupational Health and Safety Administration (OSHA). This training is included as part of the initial training received by all field personnel. Training records and certificates are kept at the field office.

Universal Environmental Solutions, LLC. Industrial Wastewater Pretreatment Facility Spill Prevention, Control, and Countermeasure (SPCC) Plan

PART III - SPILL PREVENTION, CONTROL, AND COUNTERMEASURE PROVISIONS 40 CFR 112.7 and 112.9

3.1 Potential Discharge Volume and Direction of Flow [112.7(b)] and Containment [112.7(a)(3)(iii)]

Table 3-1, below, summarizes potential oil discharge scenarios. If unimpeded, oil would follow the site topography and reach Sparkman Channel via an off-site stormwater ditch bordering the southern property boundary.

Source	Type of failure	Maximum Volume (gal)	Maximum Discharge Rate (gal/hr)	Direction of Flow	Containment
Tank Farm					
Process Tanks	Fatal tank rupture due to lightning strike, seam failure	69,115	69,115	Southeast towards containment pad sump	Containment berm
PCW Tanks	Leak at manway, valves	5,000	2	Southeast towards containment pad sump	Containment berm
Piping	Overflow (1 day's production)	5,000	30	Southeast towards containment pad sump	Containment berm
Frac Tanks	Prefilter and Storage	80,000	80	Norteast towards Offloading Pad Sump	Containment Berm
Treatment System					
Treated, partially treated or untreated industrial wastewater including oily wastewater	Rupture/failure due to corrosion or seam failure	3,000	3,000	South towards offsite ditch	Containment berm
including only wastewater	Pinhole leak, or leak at connection	50	2	South towards offsite ditch	Containment berm
Transfers and Loading Ope	erations				
Transport truck loading hose	Rupture	85	85	Towards stormwater inlets	Containment berm (pending)
Offload line, connection	Leak	42	1	Towards stormwater inlets	Containment berm (pending)
Tank truck	Over-topping while loading	1,680	1,680	Towards stormwater inlets	Containment berm (pending)
Transfer valve	Rupture, leak of valve packing	3	3	Towards stormwater inlets	Transfer box containment
Berth 247 Barge Cleaning					
Bilge Pump Piping	Rupture	750	150	Towards stormwater piping inlets	Quantity spilled not great enough to reach stormwater piping
Frac Tank Piping	Rupture	750	150	Towards stormwater piping	Quantity spilled not great enough to reach stormwater piping

Table 3-1: Potential discharge volume and direction of flow

Universal Environmental Solutions, LLC.	
Industrial Wastewater Pretreatment Facility	

3.2 Containment and Diversionary Structures [112.7(c) and 112.7(a)(3)(iii)]

3.2.1 Bulk Storage Tank Containment

Waste oil and fuels are stored in above ground storage tanks (ASTs) that contain various preprocess and post process wastewater, oils, and fuels. The tanks are located within a concrete secondary containment area on the north side of the pre-treatment building. The containment pad measures 85.3 feet x 77.9 feet with walls measuring 2.5 feet high. The total capacity of the containment pad is 124,259 gallons. This secondary containment is a zero-discharge containment system with no drainage system for stormwater. All stormwater or potential spills into the containment drain to a sump located in the southeastern corner of the containment structure and are pumped back into the pre-process wastewater tanks for treatment.

3.2.2 Loading and Unloading Area Containment

The loading and unloading area(s) for tank trucks provides a connection box to capture hose connect / disconnect spills. The connection box / manifold are fitted with two flanges which are capped. The connection box / manifolds are covered with a hinged lid to prevent rainfall accumulation. Any noticeable free liquids accumulated in the box is absorbed by the plant operator in the daily / routine maintenance. All offloading of oil containing materials will occur within the frac tank pad area. The Frac Tank area design consists of a 84' x 63' x 0.8'concrete pad sloped from ground surface at the truck entry point to 1.5' below existing grade at the back wall stopping point. For capacity calculations the floor of the containment structure starts at 0' below grade and ends at 1.5' below grade, the average depth of the bottom of the containment structure is 0.8' below grade. A 6" concrete berm curb will extend above ground surface on three sides that the trucks do not enter and an 8" containment hump will be located along the truck entryway to prevent spills exposure from ground surface and rainwater from entering the frac containment area. Bollards will be placed at 3' intervals around the 3 non-truck entryway sides to prevent accidental spillage caused by trucks driving into the frac tank containment area.

The frac tank containment capacity is 31,667 gallons ($63' \times 84' \times 0.8' \times 7.48$ gallons/cu.ft) Loading and unloading piping will consist of 3 - 3" steel pipeline headers, one for unloading of PCW, one for unloading of bilge oily wastes and used oils and one for loading of recovered used oils. The unloading and loading pipelines terminate in the tank containment pad area and connect to the tanks located on the tank containment pad.

3.2.3 Wastewater Treatment Facility Containment

The wastewater treatment facility includes a DAF unit and several process and chemical tanks. The entire treatment system is located inside a metal building on a concrete floor with a one-foot high containment wall surrounding the treatment units with a containment capacity of 11,250 gallons. The pre-treatment operation tanks have a total capacity of 9,000 gallons.

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Industrial Wastewater Pretreatment Facility	Countermeasure (SPCC) Plan

3.2.4 Secondary Containment Calculations

The berm capacity exceeds the SPCC and Florida requirements. It provides secondary containment sufficient for the size of the largest tank, plus 10% of freeboard to contain precipitation. The secondary containment structure are zero discharge containment system with no drainage system for stormwater. All stormwater or potential spills into the containment drain to a sump located within the secondary containment structure and are pumped back into the pre-process wastewater tanks for treatment. Details of the berm capacity calculation are provided in Table 3-2.1 and 3.2.2.

Table 3-2.1: Tank Farm Pad Capacity Calculations

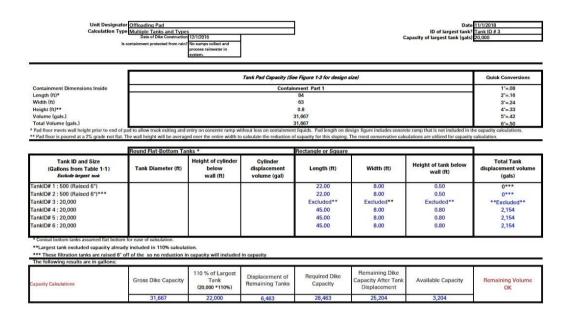
		Date <u>11/1/2018</u> ID of largest tank? <u>Tank ID # 7</u> Capacity of largest tank (gats) <u>69,118</u>
	Tank Pad Capacity	Quick Conversions
Containment Dimensions Inside	Containment Part 1	1*=.08
ength (ft)	85.34	2*=.16
Vidth (ft)	77.91	3*=.24
leight (ft)	2.5	4"=.33
olume (gals.)	124,333	5'=.42

	Round Flat-Bottom Ta	nks *		Rectangle or Square			
Tank ID and Size (Gallons from Table 1-1) Exclude largest tank	Tank Diameter (ft)	Height of cylinder below wall (ft)	Cylinder displacement volume (gal)	Length (ft)	Width (ft)	Height of tank below wall (ft)	Total Tank displacement volume (gals)
TankiD# 7 : 69,115				Excluded**	Excluded**	Excluded**	Excluded
TankID# 8 : 69,116				55.00	14.00	2.50	14,399
TankID# 9 : 69,117				55.00	14.00	2.50	14,399
TankID# 10 : 60,318				48.00	14.00	2.50	12,566
TanklD# 11 : 5,000	10.00	2.50	1468.65	Contractory of	a second		1,469
TankID# 12 : 5,000	10.00	2.50	1468.65				1,469
TankID# 13 : 5,000	10.00	2.50	1468.65				1,469
TankiD# 14 : 10,000	12.00	2.50	2114.86				2,115
TankID# 15 : 1,000	5.00	2.50	367.16				367
FanklD# 16 : 100	3.00	2.50	132.18				132
FanklD# 17 : 1,000	5.00	2.60	367.16				367
Tank ID# 18:80	5.00	2.50	367.16				367

Capacity Calaculations	Gross Dike Capacity	110 % of Largest Tank (69,118 • 110%)	Displacement of Remaining Tanks	Required Dike Capacity	Remaining Dike Capacity After Tank Displacement	Available Capacity	Remaining Volume OK
	124,333	76,030	49,119	123,909	76,451	424	

Universal Environmental Solutions, LLC.	Spill Prevention, Control, and
Industrial Wastewater Pretreatment Facility	Countermeasure (SPCC) Plan

Table 3-2.1: Tank Farm Pad Capacity Calculations



3.2.5 Practicability of Secondary Containment [112.7(d)]

The use of the containment and diversionary structures and the use of readily available spill equipment to prevent discharged oil from reaching navigable water, is practical and effective at this facility.

3.3 Inspections, Tests, and Records [112.7(e)]

This Plan outlines procedures for inspecting the facility equipment in accordance with SPCC requirements. Records of inspections performed as described in this Plan and signed by the appropriate supervisor are a part of this Plan and are maintained with this Plan at the Tampa Florida office for a minimum of three years. The reports include a description of the inspection procedure, the date of inspection, whether drainage of accumulated rainwater was required, and the inspector's signature.

The inspection program is comprised of informal daily examinations, monthly scheduled inspections, and periodic condition inspections. Additional inspections and/or examinations are performed whenever an operation alert, malfunction, shell or deck leak, or potential bottom leak

Universal Environmental Solutions, LLC.	Spill Prevention, Control, and
Industrial Wastewater Pretreatment Facility	Countermeasure (SPCC) Plan

is reported following a scheduled examination. Written examination/inspection procedures and monthly examination/inspection reports are signed by the field inspector and are maintained at the field office for a period of at least three years.

3.3.1 Daily Examinations

Daily visual inspections consist of a complete walk-through of the facility to check the following: piping, equipment and tanks for leakage, soils for staining and discoloring, excessive accumulation of rainwater in the dike, verification that the dike drain valve is sealed closed, and to confirm that the facility effluent (from water separator) is free from oil.

3.3.2 Monthly and Annual Inspections

The checklists provided in Appendix B is used during monthly and annual inspections. The items covered in the inspections are performed in accordance with API standards and good engineering practices. These written monthly and annual reports (checklists) are prepared, signed by the inspector, and the original copies are maintained on file for three years.

3.4 Brittle Fracture Evaluation [112.7(i)]

At the present time, none of the bulk storage containers at this site was field-erected, and therefore no brittle fracture evaluation is required.

3.5 Security (40 CFR 112.7(g))

The UES facility has the following security measures in-place for the storage of oil products when the facility is not in production:

Fencing and Lighting

There is fencing and two gates to control entrance or egress from the Pre-Treatment area. The building is secured with a perimeter fence and requires a key to enter facility during nonworking hours. UES owned lights are located throughout the property. The facility is locked during non-operating hours.

Surveillance

One UES owned camera is located on the northwest corner of the Pre-Treatment building overlooking the two entrance gates that are monitored by the onsite security personnel. The security personnel are familiar with this SPCC Plan and have a copy on file should a pill be identified during walk rounds and inspections.

<u>Alarms</u>

Audible and visual alarms are installed within the process system PLC and are operating 24 hours a day 7 days a week.

Universal Environmental Solutions, LLC.	Spill Prevention, Control, and
Industrial Wastewater Pretreatment Facility	Countermeasure (SPCC) Plan

3.6 Personnel, Training, and Discharge Prevention Procedures [112.7(f)]

The Field Operations Manager has been designated as the point of contact for all oil discharge prevention and response at this facility.

All UES field personnel receive training on proper handling of oil products and procedures to respond to an oil discharge prior to entering the production facility. The training ensures that all facility personnel understand the procedures described in this SPCC Plan and are informed of the requirements under applicable pollution control laws, rules and regulations. All UES field personnel also receive an initial 40-hour HAZWOPER training (and 8-hour annual refresher training) as per OSHA standard.

UES ensures that all contractor personnel are familiar with the facility operations, safety procedures, and spill prevention and control procedures described in this Plan prior to working at the facility. UES management holds briefings with field operations personnel (including contractor personnel as appropriate) at least once a year, as described below.

3.6.1 Spill Prevention Briefing

The Field Operations Manager conducts Spill Prevention Briefings annually to ensure adequate understanding and effective implementation of this SPCC Plan. These briefings highlight and describe known spill events or failures, malfunctioning components, and recently developed precautionary measures. The briefings are conducted in conjunction with the company safety meetings. Sign-in sheets, which include the topics of discussion at each meeting, are maintained with this Plan at the UES office. An Employee Training Log form is provided in Appendix C to this Plan and is used to document the briefings. The scheduled annual briefing includes a review of UES policies and procedures relating to spill prevention, control, cleanup, and reporting; procedures for routine handling of products (e.g., loading, unloading, transfers); SPCC inspections and spill prevention procedures; spill reporting procedures; spill response; and recovery, disposal, and treatment of spilled material.

Personnel are instructed in operation and maintenance of equipment to prevent the discharge of oil, and in applicable federal, state, and local pollution laws, rules, and regulations. Facility operators and other personnel have an opportunity during the briefings to share recommendations concerning health, safety, and environmental issues encountered during facility operations.

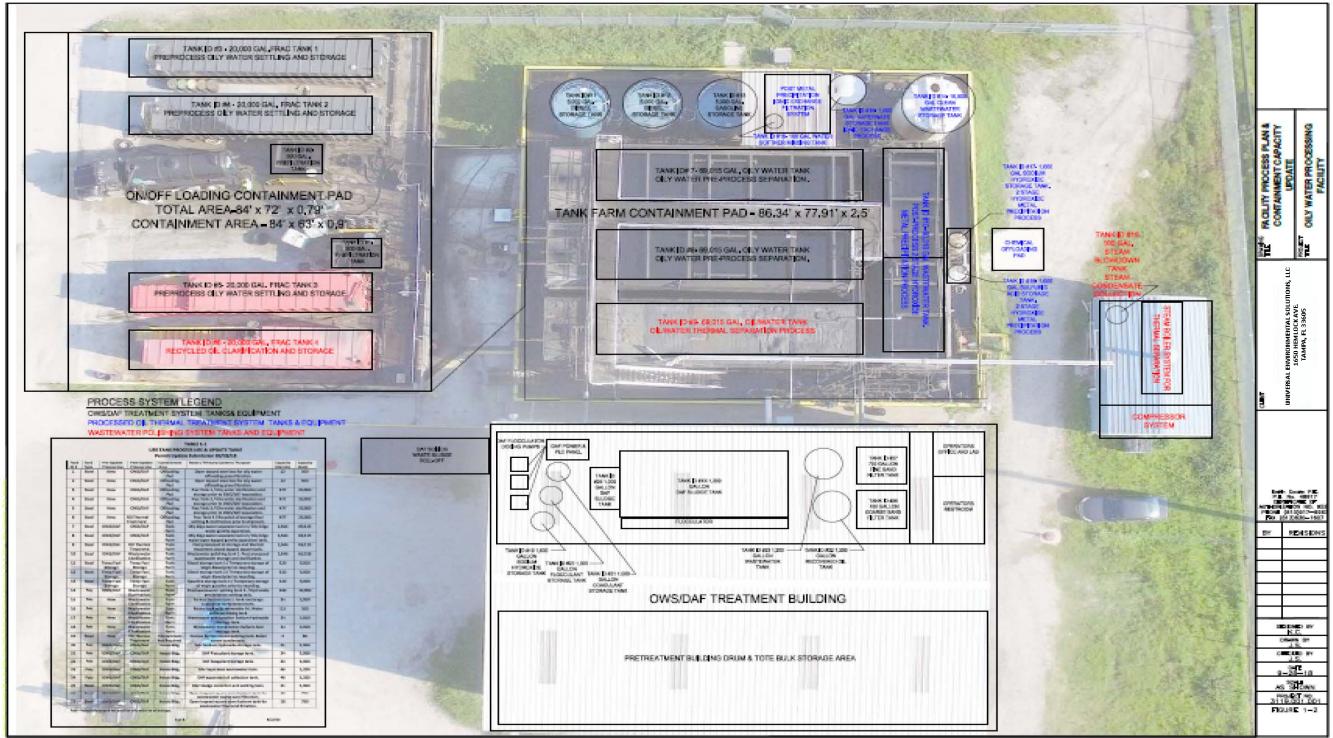
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Figure 1-1 – Site Plan



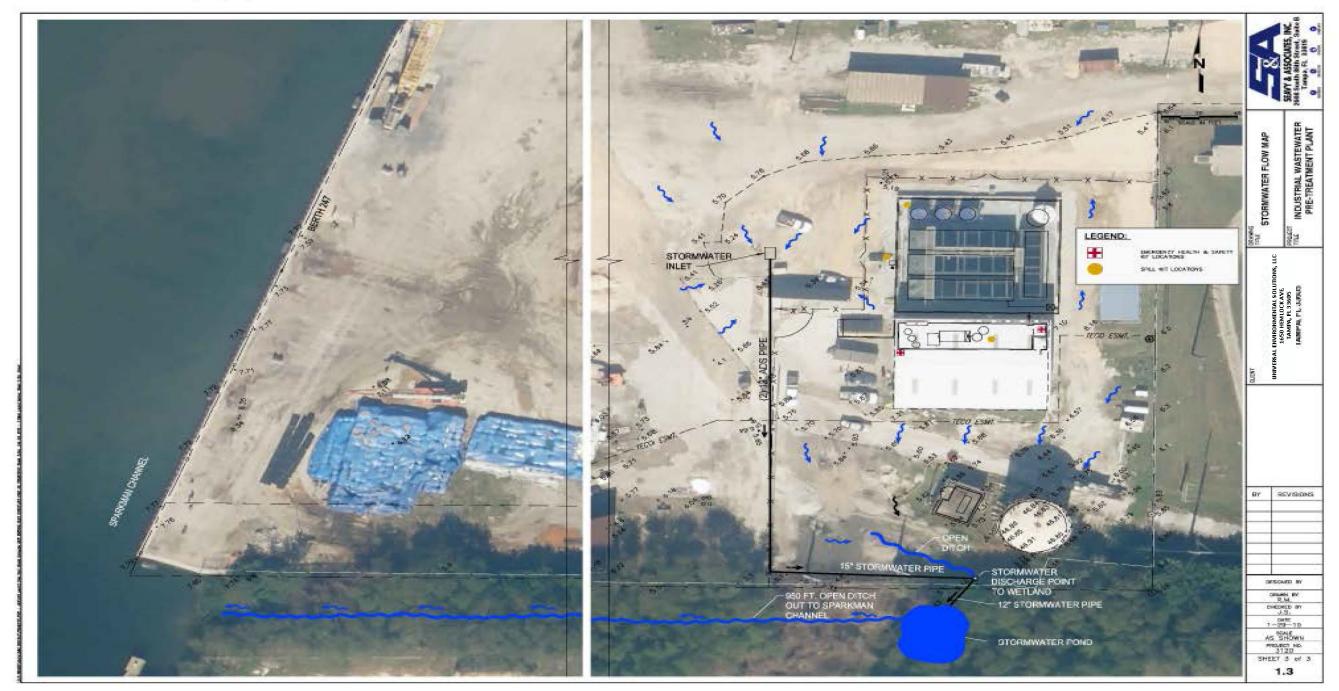
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Industrial Wastewater Pretreatment Facility	Countermeasure (SPCC) Plan

Figure 2-1 – Stormwater Flow & Emergency Spill Kit Location Plans



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Industrial Wastewater Pretreatment Facility	Countermeasure (SPCC) Plan

APPENDIX A Certification of Substantial Harm Determination 40 CFR 112.20(e), 40 CFR 112.20(f)(1)

Facility Name: Universal Environmental Solutions, LLC, Industrial Wastewater Pretreatment Facility, Tampa, Florida

1. Does the facility transfer oil over water to or from vessels and does the facility have a total oil storage capacity greater than or equal to 42,000 gallons? Yes No X

2. Does the facility have a total oil storage capacity greater than or equal to 1 million gallons and does the facility lack secondary containment that is sufficiently large to contain the capacity of the largest aboveground oil storage tank plus sufficient freeboard to allow for precipitation within any aboveground storage tank area?

Yes	No X

3. Does the facility have a total oil storage capacity greater than or equal to 1 million gallons and is the facility located at a distance (as calculated using the appropriate formula) such that a discharge from the facility could cause injury to fish and wildlife and sensitive environments? Yes No X

4. Does the facility have a total oil storage capacity greater than or equal to 1 million gallons and is the facility located at a distance (as calculated using the appropriate formula) such that a discharge from the facility would shut down a public drinking water intake? Yes No X

5. Does the facility have a total oil storage capacity greater than or equal to 1 million gallons and has the facility experienced a reportable oil spill in an amount greater than or equal to 10,000 gallons within the last 5 years?

Yes

No X

Certification

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this document, and that based on my inquiry of those individuals responsible for obtaining this information, I believe that the submitted information is true, accurate, and complete.

Ed Kinley, President

F.K.-L Signature:

Spill Prevention, Control, and Countermeasure (SPCC) Plan

APPENDIX B

Water Plant Weekly Update Sheet

		Tank Farm Levels				Frac Tank levels		Farm Levels Frac Tank levels			Comments
Date	Tank 1 (Cook Oil)	Tank 2 (Process Water)	Tank 3 (Process Water)	Tank 4 (Precipitation)	Frac #1 (Process Water)	Frac #2 (Process Water)	Frac#3 (Process Water)	Frac #4 (Recovered Oil)	(Additional Information on tank levels/ product)		
	Front Oil Level										
	Front Water Level										
	Back Oil Level										
	Back Water Level							6			
	Temp.					0	<i>25</i>				
	Stage					1	- 100				
	Drums										
	DAF				51						
	Maintenance Issues							<u> </u>			
	Boiler										
-1	Air Compressors										
	Air Compressors							<u></u>			
	Roll-off Box					•	à à				
~			8								
						4					

Tank 1 Stages: HEATING: Bringing product up to temp. COOKING : While product is at tempeatue and demulsifier has been added the tank is rotating product to incorporate demulsifier into the batch. COOKING : While product is at tempeatue and demulsifier has been added the tank is rotating product to incorporate demulsifier into the batch. COOKING : After tank has been rotated for 10 hours boiler is shut off and the batch is left to cool for 2 days to allow oil to cool and let water drop out. TRANSFERING: After product has sat for two days a oil/water precentage test is performed and if water content is in range product is transferred to Frac tank 4 for disposal to recycle facility.

Spill Prevention, Control, and Countermeasure (SPCC) Plan

APPENDIX B Monthly and Annual Inspection Checklist

Further description and comments, if needed, should be provided on a separate sheet of paper and attached to this sheet. Any item answered "YES" needs to be promptly reported, repaired, or replaced, as it may result in non-compliance with regulatory requirements. Records are maintained with the SPCC Plan at the Ridgeview field office.

Date:

Signature:

	Yes	No	Description & Comments (Note tank/equipment ID)
Storage tanks and Separation Equipment	_!		<u>k</u>
Tank surfaces show signs of leakage			
Tanks show signs of damage, rust, or deterioration			
Bolts, rivets or seams are damaged			
Aboveground tank supports are deteriorated or buckled			
Aboveground tank foundations have eroded or settled			
Gaskets are leaking			
Level gauges or alarms are inoperative			
Tank agitators are operational			
Stairs, handrails, decking secured			
Containment berm shows discoloration or stains			
Berm is breached or eroded or has vegetation			
Tank weirs are operational			
Tank area clear of trash and vegetation			
Equipment protectors, labels, or signs are missing		1	
Piping/Flowlines and Related Equipment		а	
Valve seals or gaskets are leaking.			
Pipelines or supports are damaged or deteriorated.			
Buried pipelines are exposed.			
Transfer equipment			
Loading/unloading lines are damaged or deteriorated.			
Connections are not capped or blank-flanged			
Secondary containment is damaged or stained			
Response Kit Inventory)r	
Discharge response material is missing or damaged or needs replacement			

Additional Remarks (attach sheet as needed):

Spill Prevention, Control, and Countermeasure (SPCC) Plan

APPENDIX C Employee Training Log

Briefings will be scheduled and conducted by the facility owner or operator for operating personnel at regular intervals to ensure adequate understanding of this SPCC Plan. The briefings will also highlight and describe known discharge events or failures, malfunctioning components, and recently implemented precautionary measures and best practices. Personnel will also be instructed in operation and maintenance of equipment to prevent the discharge of oil, and in applicable pollution laws, rules, and regulations. Facility operators and other personnel will have an opportunity during the briefings to share recommendations concerning health, safety, and environmental issues encountered during facility operations.

Date	Subject Covered	Employees In Attendance	Instructor(s)
		-	

Spill Prevention, C	Control, and
Countermeasure (S	SPCC) Plan

APPENDIX D SPCC Plan Amendments and Re-Certification Log

SPCC Plan Amendment No. ____1

Amendment Description:

The SPCC Plan was modified to include additional tanks and processes related to the completion and addition of the Offloading Pad, addition of storage tanks and final wastewater and oil treatment processes. The final wastewater and oil clarification processes impact on the plan is minimal as it only includes the addition of non-oil bearing tanks and repurposing of existing tanks covered in the original plan. The tank table was updated and the fac

PROFESSIONAL ENGINEER CERTIFICATION

CERTIFICATION: I hereby certify that I have examined life latellay and, being familiar with the provisions of 40 CFR Part 112, attest that this SPCC Plan Amendment the Son preparation in accordance with good engineering practices. Keith Coats

SPILL PREVENTION, CONTROL AND COUNTERMEASURE PLAN MANAGEMENT APPROVAL

This SPCC plan Amendment is fully approved by the management of Universal Environmental Solutions, LLC and has been implemented as described herein.

Ed Kinley, President

02/19/19

SPILL PREVENTION, CONTROL AND COUNTERMEASURE PLAN

29

Universal Environmental Solutions, LLC.	Spill Prevention, Control, and
Industrial Wastewater Pretreatment Facility	Countermeasure (SPCC) Plan

COMPLIANCE REVIEW PAGE

SPCC Certification Log

In accordance with 40 CFR 112.5(b), a review and evaluation of this SPCC Plan is conducted at least once every five years. These reviews and evaluations are recorded below:

<u>Reviewer (signature)</u>	Reviewer (print)	Date	Comments	Is P.E. re-certification required ? Yes or No
1. Klu	Keith Coats, P.E.	11/01/12	8	Yes
2.				
3.				
4.				
5.				
6.				
7.				
8.				
9.				
10.				

Spill Prevention, Control, and Countermeasure (SPCC) Plan

APPENDIX E: Discharge Prevention Briefing Log

Date Type of Briefing	Instructor(s)		

Universal Environmental Solutions, LLC.	Spill Prevention, Control, and
Industrial Wastewater Pretreatment Facility	Countermeasure (SPCC) Plan

APPENDIX F: Discharge Notification Procedures

Circumstances, instructions, and phone numbers for reporting a discharge to the National Response Center and other federal, state, and local agencies, and to other affected parties, are provided below. They are also posted at the facility in the storage shed containing the discharge response equipment. Note that any discharge to water must be reported immediately to the National Response Center.

Owner / Operator (Ed Kinley) Local Emergency (fire, explosion, or other hazards) (813) 390 - 0659 911

Agency / Organization	Agency Contact	Circumstances	When to Notify
Federal Agencies			h:
National Response Center	1-800-424-8802	Discharge reaching navigable waters.	Immediately (verbal)
EPA Region IV (Hotline)	1-404-562-8700 (24 Hours)		Immediately (verbal)
EPA Region VI Regional Administrator	61 Forsyth Street, SW	Discharge 1,000 gallons or more; or second discharge of 42	Written notification within 60 days (see Section 2.1 of
•	Atlanta, GA. 30303	gallons or more over a 12-month period.	this Plan)
State Agencies			
State Warning Point	1-877-272-8335 (24 Hours)	 Injury requiring hospitalization or fatality. 	Immediately (verbal)
		 2) Fire, explosion, or other impact that could affect public safety. 3) Release exceeding 24-hour reportable quantity. 4) Impact to areas beyond the facility's confines. 	Written notification to be made within 5 days.
Fish & Wildlife Services	1-904-731-3336	Discharges that pose emergency conditions, regardless of the volume discharged.	Within 1 hour of discovery (verbal).
		volume usonargea.	Written notification within 7 working days.
FDEP Office of ER	1-850-245-2010	Petroleum discharges that exceed 25 Gallons	Within 24 hours of discovery (verbal). Written notification within 7 working days.
Others			
Response/cleanup contractors	SWS First Response (813) 241 - 0282	Any discharge that exceeds the capacity of facility personnel to respond and cleanup.	As needed

Universal Environmental Solutions, LLC.	Spill Prevention, Control, and
Industrial Wastewater Pretreatment Facility	Countermeasure (SPCC) Plan

The person reporting the discharge must provide the following information:

- Name, location, organization, and telephone number; .
- Name and address of the owner/operator; .
- Date and time of the incident; .
- Location of the incident:
- Source and cause of discharge;
- Types of material(s) discharged;
- Total quantity of materials discharged;
- Quantity discharged in harmful quantity (to navigable waters or adjoining shorelines);
- Danger or threat posed by the release or discharge;
- Description of all affected media (e.g., water, soil);
- Number and types of injuries (if any) and damaged caused;
- Weather conditions:
- Actions used to stop, remove, and mitigate effects of the discharge;
- Whether an evacuation is needed;
- Name of individuals and/or organizations contacted; and
- Any other information that may help emergency personnel respond to the incident.

Whenever the facility discharges more than 1,000 gallons of oil in a single event, or discharges more than 42 gallons of oil in each of two discharge incidents within a 12-month period, the Manager of Field Operations must provide the following information to the U.S. Environmental Protection Agency's Regional Administrator within 60 days:

- Name of the facility;
- Name of the owner or operator;
- Location of the facility;
- Maximum storage or handling capacity and normal daily throughput;
- Corrective actions and countermeasures taken, including a description of equipment repairs and replacements;
- Description of facility, including maps, flow diagrams, and topographical maps;
- Cause of the discharge(s) to navigable waters, including a failure analysis of the system and subsystems in which the failure occurred;
- Additional preventive measures taken or contemplated to minimize possibility of recurrence; and
- Other pertinent information requested by the Regional Administrator.

Spill Prevention, Control, and Countermeasure (SPCC) Plan

Discharge Notification Form Facility: Universal Environmental Solutions, LLC / 1650 Hemlock Street / Tampa, FL. 33605

Description of Discharge		
Date/time	Release date: Release time: Duration:	Discovery date: Discovery time:
Reporting Individual	Name: Tel. #:	
Location of discharge	Latitude: Longitude:	Description:
Equipment source	G piping G flowline G well G unknown G stock, flare	Description: Equipment ID:
Product	G crude oil G saltwater G other*	* Describe other:
Appearance and description		
Environmental conditions	Wind direction: Wind speed:	Rainfall: Current:
Impacts		
Quantity	Released:	Recovered:
Receiving medium	G water** G land G other (describe):	G Release confined to company property. G Release outside company property. ** If water, indicate extent and body of water;
Describe circumstances of the release		
Assessment of impacts and remedial actions		
Disposal method for recovered material		
Action taken to prevent incident from reoccurring		
Safety issues	G Injuries G Fatalities G Evacuation	
Notifications		
Agency	Name	Date/time reported & Comments
Company Spill Response Coordinator (Ed Kinley)		
National Response Center 1-800-424-8802		
State Warning Point		
FDEP Bureau of ER		
Oil spill removal organization/cleanup contractor (SWS)		

Spill Prevention, Control, and Countermeasure (SPCC) Plan

APPENDIX G: Equipment Shut-off Procedures

Source	Action
Manifold, transfer pumps or hose failure	Shut off the pump(s) supplying oil to the tank system if appropriate. Immediately close the header/manifold or appropriate valve(s). Shut off transfer pumps.
Tank overflow	Shut off the pump(s) supplying oil to the tank system. Close header/manifold or appropriate valve(s)
Tank failure	Shut off the pump (s) supplying oil to the tank system. Close inlet valve to the storage tanks.
Explosion or fire	Immediately evacuate personnel from the area until the danger is over. Immediately shut off pumps if safe to do so. If possible, close all manifold valves. If the fire is small enough such that it is safe to do so, attempt to extinguish with fire extinguishers available on site.
Equipment failure	Immediately close the nearest valve to stop the flow of oil into the leaking area.

APPENDIX H: Written Commitment of Manpower, Equipment, and Materials

In addition to implementing the preventive measures described in this Plan, UES will also specifically:

- \$ In the event of a discharge:
 - Make available all trained field personnel to perform response actions.
 - Obtain assistance from its main ER contractor (SWS).
 - Collaborate fully with local, state, and federal authorities on response and cleanup operations.
- S Maintain all on-site oil spill control equipment described in this Plan and in the attached Oil Spill Contingency Plan.
- S Maintain all communications equipment in operating condition at all times.
- S Ensure that staging areas to be used in the event of a discharge to the Bay is accessible by field vehicles.
- Review the adequacy of on-site and third-party response capacity with pre-established response/cleanup contractor on an annual basis and update response/cleanup contractor list as necessary.
- S Maintain formal agreements/contracts with response and cleanup contractors who will provide assistance in responding to an oil discharge and/or completing cleanup.

Authorized Facility Representative:	Ed Kinley
Signature:	
Title:	President

Spill Prevention, Control, and Countermeasure (SPCC) Plan

APPENDIX I: Oil Spill Contingency Plan

The oil spill contingency plan is maintained separately at the UES Main Office & Plant Laboratory.

ATTACHMENT 9 – UNIT MANAGEMENT PLAN

Revision 4 Attachment 9 Modifications - All pages and page numbers have been modified, inspection forms and tables have been update to reflect the addition of process tanks. The 10,000 gallon poly tank identified as Tank 14 exemption request has been deleted and a frac tank, identified as Tank 6 ,exemption alternative procedure request and engineering report has been added in the attachment. Revision 4 - No Changes

9.0 Unit Management Plan for Used Oil Tanks

This attachment describes the management, Inspection and certification of used oil process and storage tanks. Tanks that do not process used oils or have used oil storage are covered under Attachment 9 SPCC Plan of the permit submission.

9.1 <u>Unit Description for Tanks</u>

The UES Pre-Treatment Facility is located on an acre parcel of land, adjacent to the Sparkman Channel. The property is shared with other firms conducting various ship repair and maintenance activities. A Site map has been included in 9.6 Figure 1 Tank Location Map and shows the UES Facility Operations and limits of operations. The UES facility operates Monday through Friday (weekends on occasion), 10 hours per day to treat bilge oily water. Bilge Oily water at the facility is primarily processed through a set of primary filtration 500 gallon screened tanks located on the tank pad (tank 1 and tank 2) and temporarly stored in three frac tank (tank 3, tank 4 and tank 5 located in the offloading containment pad. The bilge oily water is then transfered to two 69,115 gallon oil/water separator tanks located on the tank farm pad. Oil recovered from the DAF process is stored and thermally treated in one 69,115 gallon covered tank (tank 9) located on the tank farm pad. The used and virgin diesel fuel is stored in two steel 5,000 gallon tanks (tank 11 and tank 12), and the used and virgin gasoline is stored in one steel 5,000 gallon tank (tank 13). Recovered oil is transfered from tank 9 located on the tank farm containment pad to tank 6 located on the offloading containment pad for temporary storage of recovered oil prior to recycling offsite. Tanks 1 through 6 are located within the offloading containment pad area and tanks 7 through 9 are locaed within the tank farm containment pad. area north of the facility treatment building. Tanks # 1 through 5 are considered flow through structures and are exempt under 40 CFR. Tanks 14 through 18 located on the tank farm containment pad are utilized for non oil related storage of treatment dosing chemicals and treated wastewater. Tank 19 is located in the boiler and is utilized for steam blowdown and is exempt under 40 CFR. Tanks 20 through 27 are located within the covered treatment building.

The offloading containment pad containment area is an impervious concrete structure that provides containment around tanks #1 - #6 which contain filtration and temporary flow through of bilge oily water and temporary storage bilge oily water and temporry storage of thermally treated recovered waste oils. The offloading pad area pad is 85' x 63' x 0.8' and has a capacity 31,662 gallons. The Tank Farm Containment pad is 85.34' x 77.91' x 2'6" with a capacity of 125,000 gallons. Both containment areas have sufficient freeboard to allow for precipitation (15% or 4" for the 25 year and 50 year rain events). The expansion joints are filled with an impervious two part epoxy resin. Concrete sheet flow is directed to the collection sump in the tank farm and offloading pads. All rain water and spilled materials are collected and pumped back through the Pre-Treatment system for disposal to the POTW. Rain water is not authorized to return to ground level. Surface drainage is engineered so spilled materials inside the containment area of the tank farm and offloading pads will drain to a low point collection sump for return to storage tank farm and pre-treatment process.

The interior of the building contains the DAF containment area. The DAF containment area floor has a one foot high containment wall around the surrounding all plant operations that involve impacted bilge oily water. The pre-treatment operation tanks have a total capacity of 9,000 gallons. The DAF Containment area has an 11,250 gallon capacity. The following process tanks (tanks 20 - 27) are housed within the DAF containment area inside of the building inside containment area and are not exposed to rainwater, the following tanks inside the treatment building handle bilge oily water all other tanks are utilized for dosing chemicals or storage of processed wastewater:

DAF Treatment Vessel 3,000 gallon Bilge Oily Water.

Tank 25 – Steel Sludge Decant Tank 1,000 gallon Bilge Oily Water.

Tank 24 – Polyethylene Slop Tank 1,200 gallon Bilge Oily Water.

9.2 Inspection, Testing and Monitoring Schedules

Weekly inspections of the bilge oily water tanks, recovered waste oil tank, used and virgin fuel tanks, system effluent tank, sodium hydroxide tank, flocculent tank, and coagulant tank will be recorded in the form included in this document under Section 6.3 Inspection and Maintenance Forms and maintained aspart of Appendix E. Integrity testing of the 5,000 gallon fuel tanks and associated supports/foundation are to be conducted every 10 years or after any tank repairs, in addition to routine visual inspections, as required by 40 CFR 112.8(c)(6). The container testing will include a technique such as hydrostatic testing, radiographic testing, ultrasonic testing, acoustic emissions testing, or another system of non-destructive shell testing. Normal business records of the integrity testing will be maintained facility. at the Spill kits are located at the facility, which include "oil dry" and absorbent pads. Additionally, the company has 500' of oil response boon ready for immediate deployment if any catastrophic spill happens. These inventories are checked monthly to replenish any used materials. The facility maintains an SPCC Plan for thePretreatment Facility that is included in UES permit submission as Attachment 8. Records associated with the SPCC training will be kept with training files for the Emergency Spill Response Team.

9.3 <u>Tank Certification</u>

Used oil is no longer stored in the 10,000 gallon polypropylene tank, four process flow through tanks on the containment pad are used for processing of the oily water waste the tank containment pad outside. Used fuels are stored in 3-5,000 gallon tanks on the tank containment pad outside. The storage tanks are identified above as Tank #6, #7 and #8. Four process tanks are designed to handle process flow. The 10,000 gallon polypropylene tank designed for used oil storage has been repurposed to store clarified wastewater prior to discharge to the POTW. The exemption for this tank has been removed from this Revision 4 update.

UES required the use of a final settling tank for the storage of recycled oils. A frac tank identified as Tank #6, frac tank 4, was installed in the offloading containment pad for storage of recycled oils after thermal separation of post DAF separation of recovered oils. UES perfomed an engineering study and certification of the tank for the temporary storage of the recycled oils prior to recycling transport. A copy of the DEP form 62-762-901(4) Alternative Procedure Form and associated non-destructive engineering report conducted for the frac tanks use for temporary oil storage has been attached within this section.



Department of Environmental Protection

2600 Blair Stone Road • Tallahassee, Florida 32399-2400

Alternative Procedure Form

DEP Form: <u>62-762.901(4)</u> Form Title: <u>Alternative Procedure Form</u> Effective Date: <u>January 2017</u> Incorporated in Rule <u>62-762.851, F.A.C</u>.

> Attachment 9 Revision 4 Page 136

Print or type, fill out completely and attach additional sheets for multiple facilities

Section 1

Facility ID #:

Facility Name: Universal Environmental Solutions, LLC

Facility Location: 1650 Hemlock Street (Building #2) / Tampa, FL. 33605

FLR000199802

Section 2

Applicant's Name: Ed Kinley

Address: Physical: 1650 Hemlock Street / Tampa, FL. 33605 Mail: P.O. Box # 76105 / Tampa, FL. 33675

Applicant's Telephone Number: (813) 241 - 9206 X 301

Section 3

Rule citation within Chapter 62-761 or 62-762, F.A.C., that an Alternative Procedure is being requested for:

Permanent storage of processed "used oil" in a portable 20,000 Gallon Frac Tank.

Difference between Chapter 62-761 or 62-762, F.A.C., requirement and Alternative Procedure Request:

Requesting to store processed "used oil" in a portable 20,000 gallon Frac Tank (Identified as Tank #4) on the UES Frac Tank Containment Pad. Requesting formal registration of this tank.

Please write a brief description of proposed Alternative Procedure. (If you need additional space, please attach a separate sheet):

UES is limited by space and financial resources to utilize any other tank storage method. The subject tank was constructed new in 2013. It was procured by UES as a cost saving measure from an equipment auction. We have attached a tank integrity test report. The tank is within concrete containment and the containment drawing "As - Built" will be provided soon from a Florida licensed Professional Engineer.

Section 4

Please provide a brief demonstration of how the proposed Alternative Procedure provides a substantially equivalent degree of protection for the lands, surface waters, or groundwaters of the State versus established requirements. (If you need additional space, please attach a separate sheet).

We have attached a tank integrity test report. The tank is within concrete containment and the containment drawing "As - Built" will be provided soon from a Florida licensed Professional Engineer. Containment requirements are acknowledged, as required, to be 110% = 22,000 gallons. A collection sump captures storm water or other residual oily waters and directs the liquid into the UES pre-treatment facility. Electric pump has a float switch in the sump.

Section 5

ED KINLEY

EK: Applicant's Signature

07/10/18

Date

Document Information: Provide supporting documents including this form via email to Tanknotify@dep.state.fl.us, or documents can be sent to: Florida Department of Environmental Protection, Division of Waste Management, 2600 Blair Stone Road, MS 4560, Tallahassee, FL 32399

Applicant's Name (Print or Type)

County:

Hillsborough

Date	192	06 Sep 2018
Author	202	STH
Revision	f	
Report	:	18553.01.0630.01
	_	

UNIVERSAL ENVIRONMENTAL SOLUTIONS, LLC

INSPECTION AND TESTING OF FRAC TANK No. 4

KNUD E. HANSEN USA NAVAL ARCHITECTS · DESIGNERS · MARINE ENGINEERS

1650 SE 17TH STREET, SUITE 212 • FORT LAUDERDALE, FLORIDA 33316 PHONE: (954) 541-3963 • E-MAIL: KEH@KEH-US COM • WEB: WWW KEH-US COM

Attachment	9			
Revision 4	¥			
Page 137		TECHNICAL REPORT	Date :	06 Sep 2018
	V) -		Author :	STH
	- the	Inspection and Testing of	Revision :	
		UES Frac Tank No.4	Report :	18553.01.0630.01

Universal Environmental Solutions, LLC

Address	1	1650 Hemlock Street Tampa, Florida 33605
Contact Person Phone Mobile E-mail		Ed Kinley (813) 241-9206 (813) 390-0659 ekinley@uestampa.com

KNUD E. HANSEN USA

Signed and Sealed By:

Author	2	Steve Hancock	A Son Barton
Checked by	*	Peter Johansson	Moles Hotor P.E
Contact Person	÷	Steve Hancock Senior Naval Architect & Marine Engineer	Wesley L Scott, P.E. Licensed Professional Engineer Florida License No. 41197
Phone	1	(954) 541-3963	
Mobile		(954) 257-2286	Date:075EP2018
E-mail		sth@keh-us.com	<u></u> , ,

Summary:

This report provides the results of the inspection and testing of Frac Tank No. 4 at the UES Pretreatment Wastewater Facility in Tampa, Florida.

Document Classification:

Commercial in Confidence

Document History:

	Document Number			Name of Document
	KEH 18553.01.0630.01			Inspection and Testing of Frac Tank No. 4
	06 Sep 2018	STH	PEJ	Original Issue
Rev.	Date	Orig	Chkd	Remarks

KNUD E. HANSEN

TECHNICAL REPORT

Inspection and Testing of

UES Frac Tank No.4

 Date
 06 Sep 2018

 Author
 STH

 Revision

 Report
 18553.01.0630.01

TABLE OF CONTENTS

	1	Introduction	4
	2	General Description	4
	3	External Inspection	4
	4	Internal Inspection	4
	5	Access and Piping Inspection	4
	6	Ultrasonic Inspection	5
	7	Running Gear Inspection	5
	8	Hydrostatic Testing	5
	9	Conclusions	5
115	т оғ ар	PPENDICES	
L13			_
	А	Manufacturer's Data Plate	6
	В	Exterior of Tank	8
	С	Interior of Tank	15
	D	Q-SEA Gaging Report	23

TECHNICAL REPORT

Inspection and Testing of UES Frac Tank No.4

 Date
 06 Sep 2018

 Author
 STH

 Revision
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 Report
 18553.01.0630.01

1 INTRODUCTION

Universal Environmental Solutions, LLC ("UES") tasked Knud E. Hansen USA Inc. ("KEH") to perform the inspection and testing of Frac Tank No. 4 at the UES Pre-treatment Wastewater Facility in Tampa, Florida. The inspection and testing was performed on 05 September 2018 by Steve Hancock and Wesley Scott P.E. of KEH; this report summarizes the findings of the inspection.

2 GENERAL DESCRIPTION

Frac Tank No. 4 is located at the UES Pre-treatment Wastewater Facility in Tampa, Florida. It is sited on a heavy concrete pad designated as the UES Truck Receiving and Outbound Oil Containment Area. Frac Tank No. 4 is the southernmost of the frac tanks in this location and is used solely for storage of oil recovered during the treatment process.

Frac Tank No. 4 was constructed by Hohenwald Fabrication of Hohenwald, Tennessee in November 2013. It is a single skin tank of welded steel construction built for highway use and has a capacity of 20,000 gallons. Approximate overall dimensions are 50'-0" long x 8'-6" wide x 11'-0" tall. The tank has a cylindrical bottom, flat vertical sides, and flat vertical ends with recesses as needed for walkways and accesses. All framing is external to the tank.

3 EXTERNAL INSPECTION

The external steel surfaces of the frac tank were visually inspected for deformation, deterioration, and physical damage, and other deficiencies. All steel elements were found to be in excellent condition with minimal pitting, visually acceptable weld quality, and original intact protective coatings. No visible deficiencies were found.

4 INTERNAL INSPECTION

The frac tank was emptied, cleaned, and certified safe for entry prior to entry for inspection by KEH personnel. The interior of the tank was found to be clean and smooth with no evidence of pitting or loss of material and visually acceptable weld quality. There was some minor loss of the original interior coating, though this is not an issue given the tank's usage. No visible deficiencies were found.

5 ACCESS AND PIPING INSPECTION

The accesses and piping connections were found to be in excellent condition with no visible signs of deterioration. Access gaskets were in good condition and well secured, and all drop-bolt dogs were in good condition and easily operated. Connection flanges for piping were found to be in good condition. No visible deficiencies were found.

Inspection of hoses and piping external to the frac tank was not performed and is beyond the scope of this report.

TECHNICAL REPORT

Inspection and Testing of

UES Frac Tank No.4

 Date
 :
 06 Sep 2018

 Author
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 STH

 Revision
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 Report
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 18553.01.0630.01

6 ULTRASONIC INSPECTION

An ultrasonic thickness survey of the tank structure was performed by the Q-Sea Corporation of Tampa, Florida ("Q-Sea") on 12 July 2018. The gaugings performed were reviewed by KEH and were found to show little if any reduction of material thickness, which is to be expected in a tank only five years old.

No unacceptable gaugings or areas of concern were noted by Q-Sea.

7 RUNNING GEAR AND WALKWAY INSPECTION

Inspection of the tires, axles, tail lights, braking system, trailer connection, associated wiring, and other associated components were beyond the scope of this report. Operational tests were not performed, but no obvious visible deficiencies were noted.

Inspection of the walkway, hand rails, fixed ladder, and folding access ladder were beyond the scope of this report. No obvious visible deficiencies were noted.

8 HYDROSTATIC TESTING

Upon completion of internal and external visual inspections, the tank accesses were closed and the tank was filled with fresh water and hydrostatically tested for a period of one hour. The tank structure was then checked for distortion and the tank boundaries and welds were inspected for leakage. Accesses and piping connections were also checked for tightness and distortion. No visible deficiencies were found.

9 CONCLUSIONS

Based on the visual inspection performed by KEH, the ultrasonic testing performed by Q-Sea, the age of the unit, and the results of the hydrostatic test, it was found that Frac Tank No. 4 was in excellent condition and fit for its intended service.

TECHNICAL REPORT

Inspection and Testing of

 Date
 06 Sep 2018

 Author
 STH

 Revision

 Report
 18553.01.0630.01

UES Frac Tank No.4

APPENDIX A

MANUFACTURER'S DATA PLATE

Attachment 9 Revision 4					
Page 142	h	TECHNICAL REPORT	Date	8	06 Sep 2018
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	SHIF DESIGN SHICE 1837	UES Frac Tank No.4	Report	:	18553.01.0630.01

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MODEL#	P. M. S. R. P.	CUSTOMER	IS SAN
G.A.W.R.	0642	WEIGHT 1856	10
MFG DATE	11=130	LENGTH DOM	5
SERIAL #	日本市人	1111625-11	

MANUFACTURER'S DATA PLATE



LOCATION OF MANUFACTURER'S DATA PLATE

TECHNICAL REPORT

Inspection and Testing of

UES Frac Tank No.4

 Date
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 06 Sep 2018

 Author
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 STH

 Revision
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 Report
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KNUD E. HANSEN

APPENDIX B

EXTERIOR OF TANK

TECHNICAL REPORT

 Date
 :
 06 Sep 2018

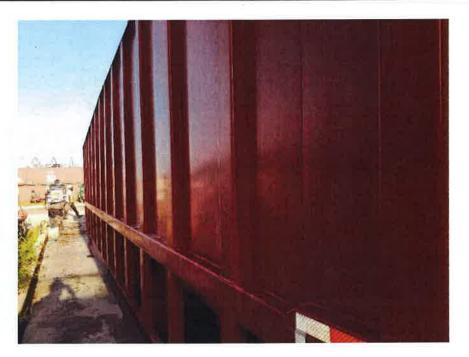
 Author
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Inspection and Testing of UES Frac Tank No.4



LEFT SIDE PLATING & FRAMING



ACCESS HATCH AND REAR FACE

TECHNICAL REPORT

Inspection and Testing of UES Frac Tank No.4

 Date
 06 Sep 2018

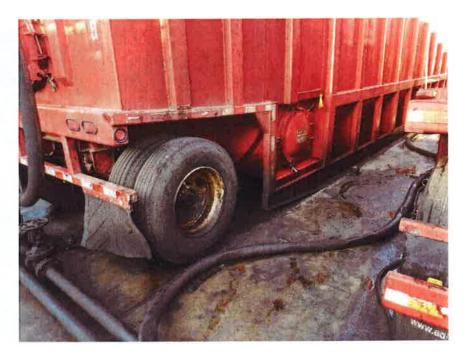
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RIGHT SIDE PLATING & FRAMING



RIGHT SIDE TIRES AND ACCESS HATCH

TECHNICAL REPORT

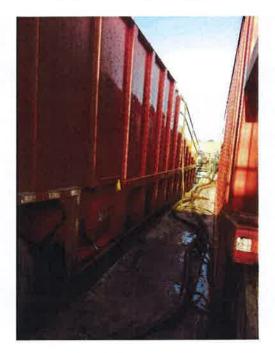
Inspection and Testing of UES Frac Tank No.4

 Date
 06 Sep 2018

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 STH

 Revision
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 Report
 18553.01.0630.01



RIGHT SIDE PLATING & FRAMING



BLANKED FILL / DISCHARGE VALVE

KNUD E. HANSEN

TECHNICAL REPORT

Inspection and Testing of

UES Frac Tank No.4

 Date
 06 Sep 2018

 Author
 STH

 Revision
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 Report
 18553.01.0630.01



FRONT FACE AND RIGHT SIDE WALKWAY



REAR OF RIGHT SIDE WALKWAY RECESS

TECHNICAL REPORT

Inspection and Testing of UES Frac Tank No.4

 Date
 06 Sep 2018

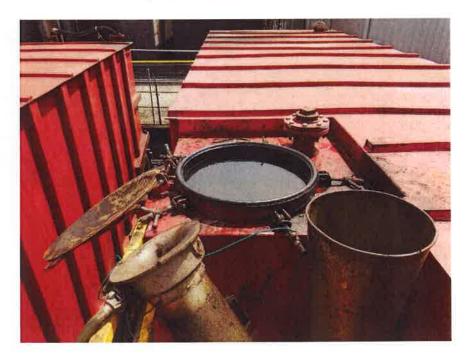
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 Revision
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 Report
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 18553.01.0630.01



FRONT PORTION OF TOP OF TANK AND WALKWAY



RER HALF OF TOP OF TANK AND ACCESS HATCH

KNUD E. HANSEN

TECHNICAL REPORT

Inspection and Testing of

UES Frac Tank No.4

 Date
 06 Sep 2018

 Author
 STH

 Revision
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 Report
 18553.01.0630.01



TYPICAL ACCESS HATCH



TYPICAL BRACING FOR TANK BOTTOM & SKID

 Date
 06 Sep 2018

 Author
 STH

 Revision
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 Report
 18553.01.0630.01

KNUD E. HANSEN

Inspection and Testing of UES Frac Tank No.4

APPENDIX C

INTERIOR OF TANK

KNUD E. HANSEN

TECHNICAL REPORT

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Date		06 Sep 2018
Author	1	STH
Revision	ş	
Report	:	18553.01.0630.01
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OVERALL VIEW LOOKING TO REAR OF TANK



OVERALL VIEW LOOKING TO FRONT OF TANK

KNUD E. HANSEN

TECHNICAL REPORT

Inspection and Testing of UES Frac Tank No.4

Date	3	06 Sep 2018
Author	43	STH
Revision	1	
Report	į.	18553.01.0630.01



INSTALLATION OF ACCESS HATCH AT FRONT FACE



MINOR LOSS OF COATING ON BOTTOM

TECHNICAL REPORT

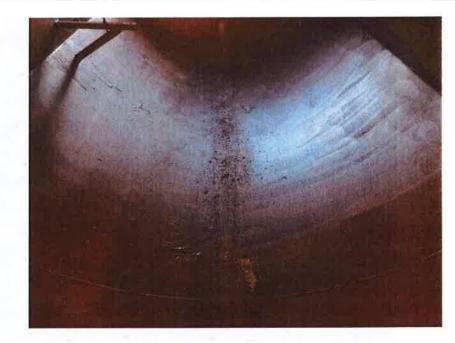
Inspection and Testing of UES Frac Tank No.4

 Date
 06 Sep 2018

 Author
 STH

 Revision
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 Report
 18553.01.0630.01



COATING ON BOTTOM



MINOR LOSS OF COATING ON LEFT SIDE

KNUD E. HANSEN

TECHNICAL REPORT

Inspection and Testing of UES Frac Tank No.4

 Date
 :
 06 Sep 2018

 Author
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 STH

 Revision
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 Report
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 18553.01.0630.01



HANGERS FOR REMOVED PIPING AND CLOSE UP OF COATING



COATING ON TOP PLATING

 Date
 06 Sep 2018

 Author
 STH

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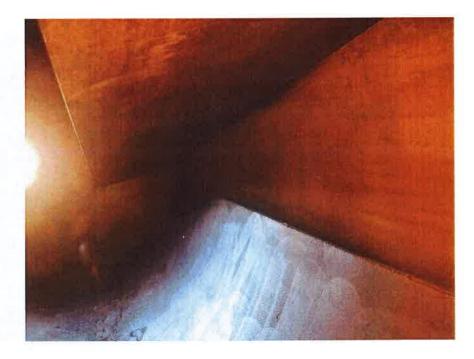
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KNUD E. HANSEN	

Inspection and Testing of UES Frac Tank No.4



COATING ON SIDE OF WALKWAY RECESS



COATING ON BOTTOM OF WALKWAY RECESS

TECHNICAL REPORT

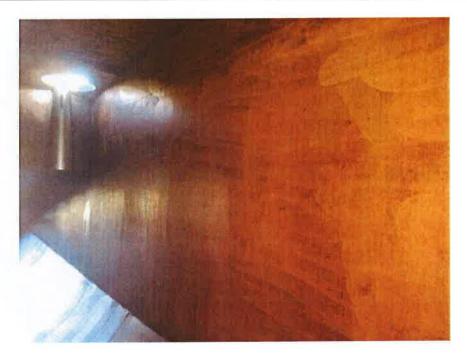
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 Date
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 06 Sep 2018

 Author
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 STH

 Revision
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 Report
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 18553.01.0630.01



COATING ON LEFT WALL

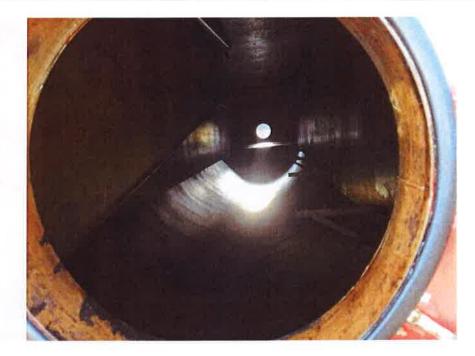


COATING AT REAR OF TANK

TECHNICAL REPORT

Inspection and Testing of UES Frac Tank No.4

Dat	e	ŝ	06 Sep 2018
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Rev	vision	ŝ	
Rep	port	:	18553.01.0630.01



OVERALL VIEW OF TANK

TECHNICAL REPORT

Inspection and Testing of UES Frac Tank No.4

 Date
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 06 Sep 2018

 Author
 :
 STH

 Revision
 :

 Report
 :
 18553.01.0630.01

APPENDIX D

Q-SEA GAUGING REPORT

TECHNICAL REPORT

KNUD E. HANSEN

Inspection and Testing of UES Frac Tank No.4

 Date
 :
 06 Sep 2018

 Author
 :
 STH

 Revision
 :
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 Report
 :
 18553.01.0630.01



NON DESTRUCTIVE TESTING SERVICES

UES FRAC TANK #4 ROUND BOTTOM (RECEIVING PAD)

06/12/2018

ABS Americas 18-NO3495436-A, 18-NO3495436-B, 18-NO3495436-C Lloyd's Register MNDE/2016/7518 * Det Norske Veritas-GL AOSS0000D1W Bureau Veritas MIA0/CAD/20160920085602 * Class NK 17TZ041

1500 4th Street, Sulte A, Harvey, Louisiana 70058 * Phone (504) 368-8762 * Fax (504) 368-8764 5275 Causeway Blvd, Sulte 2, Tampa, Florida 33619 * Phone (813) 740-1800 * Fax (813) 740-1888

TECHNICAL REPORT

 Date
 :
 06 Sep 2018

 Author
 :
 STH

 Revision
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 Report
 :
 18553.01.0630.01



Inspection and Testing of

UES Frac Tank No.4



NON DESTRUCTIVE TESTING SERVICES

INDEX

UES FRAC TANK #4 ROUND BOTTOM (RECEIVING PAD)

FORM	DESCRIPTION		PAGE NO.
GP	GENERAL PARTICULARS		GP
	ABS CERTIFICATE		
	ON SITE CALIBRATIONS		
TM6	PLATING	FWD AND AFT ENDS	1
QSEA DRAW	PLATING & FRAMING	PORT AND STBD. SIDES	2
TM6A	PLATING & FRAMING	PORT AMD STBD. SIDES	3
TM6	PLATING	TOP OF TANK	4

TECHNICAL REPORT

Inspection and Testing of

06 Sep 2018 Date 1 STH Author 3 Revision : ---0630.01

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KNUD	E. HANSEN

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	UES Frac Tan	k No.4		Report	:	18553.01
тніс	KNESS MEASUR		ORT			
init.	GENERAL PART					
Vessel Name:	UES FRAC TANK #4 R	OUND BOTTO	M (RECEIVING PAD)		
.*.						
Classification Society:	AMERICAN BUREAU	of Shipping				3
					_	
Name of Company performing thickness measurements:						
Thickness measurement company certified by:	AMERICAN BUREAU					
Certificate No.:	18-NO3495436-A, 18-N 18-NO3495436-C	O3495436-B,				
Certificate valid from:	05/09/2018 to:	01/06/202	1			
Place of measurement:	UES YARD		TAMPA, FL			
First date of measurement:	06/12/2018					
Last date of measurement:	06/12/2018					
Special survey/intermediate survey due:	OWNER'S REPORT					
Details of measurement equipment:	CYGNUS 2+	S/N	21552			
	CALIBRATION STD	S/N	06-2076			
Qualification of operator:	L-II TECHNICIAN					
Q-SEA Report No. TPA-00180	00	nsisting of	4	Sheets		
Name of operator: MR. J. POLITTE						

Signature of operator: Operator Official Stamp:

G-SEA 1-01A pay ME The

TMGP

KNUD E. HANSEN

TECHNICAL REPORT

Inspection and Testing of

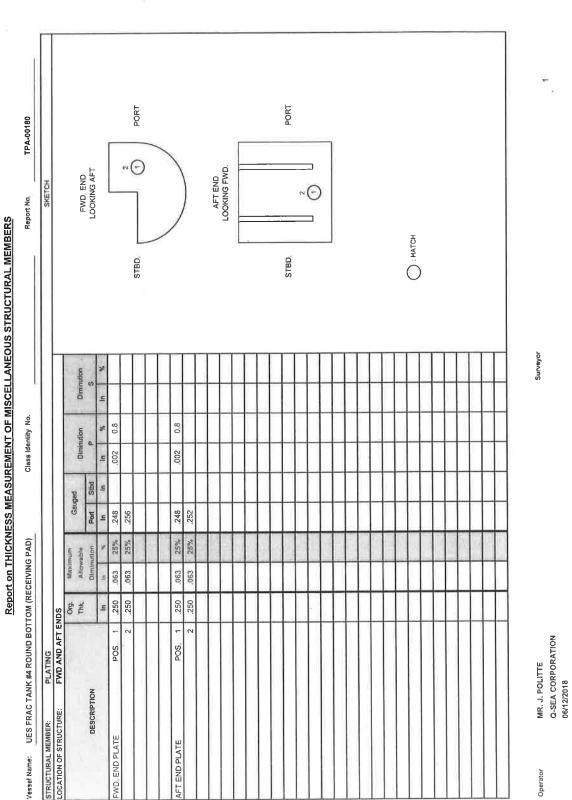
UES Frac Tank No.4

 Date
 :
 06 Sep 2018

 Author
 :
 STH

 Revision
 :
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 Report
 :
 18553.01.0630.01



Attachment 9 **Revision 4** Date 06 Sep 2018 ŝ Page 162 **TECHNICAL REPORT** Author STH 2 Inspection and Testing of Revision : ----KNUD E. HANSEN Report 18553.01.0630.01 UES Frac Tank No.4 : FWD 2 -2 ŝ N 4 n ø STBD. SIDE LOOKING INBD. ► 8 n X 80 6 Location of Structur PORT AND STBD. SIDES ę 1 12 • 主 Q-SEA CORPORATION NON DESTRUCTIVE TESTING SERVICES 06/12/2018 5 4 5 ið ÅF Date: AFT UES FRAC TANK #4 ROUND BOTTOM (RECEIVING PAD) 4D ņ 44 60 4 ę 12 Ŧ PORT SIDE LOOKING INBD. ₽ თ . Ð ø PLATING & FRAMING H : HATCH 5 ю ю \sim 4 3 3 Structural Member _ Vessel Name: OSEA DRAW FWD.

TECHNICAL REPORT

06 Sep 2018 Date 2 STH Author ţ, Revision : ----18553.01.0630.01 Report :

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TPA-00180

Report No.

Report on THICKNESS MEASUREMENT OF MISCELLANEOUS PLATE

Class identity No.

UES FRAC TANK #4 ROUND BOTTOM (RECEIVING PAD)

Vossal Namo:

Inspection and Testing of

UES Frac Tank No.4

Other Definition D	STRUCTURAL MEMBER:	PLAT	PLATING & FRAMING	KAMING													
Operation Operation <t< th=""><th>LOCATION OF STRUCTURE:</th><th>PORT</th><th>AMD ST</th><th>TBD. SIC</th><th>DES</th><th></th><th></th><th></th><th></th><th></th><th></th><th></th><th></th><th></th><th></th><th></th><th></th></t<>	LOCATION OF STRUCTURE:	PORT	AMD ST	TBD. SIC	DES												
Image Image <th< th=""><th>DESCRETION</th><th></th><th>Org</th><th>Altow</th><th>mum mble</th><th>Gaug</th><th>Pe</th><th>Diminutic</th><th>T</th><th>Diminutio</th><th>6.76</th><th></th><th>Allo</th><th>limum webla nuttion</th><th>Grupped</th><th>Dimimution</th><th>Diminu</th></th<>	DESCRETION		Org	Altow	mum mble	Gaug	Pe	Diminutic	T	Diminutio	6.76		Allo	limum webla nuttion	Grupped	Dimimution	Diminu
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Attachment 9

Page 30 of 30

Forms <u>9.4</u>

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The following forms are utilized to track maintain and track storage tanks onsite. The forms are filled out by the plant operator and record of the inspections are kept onsite and at the uES office. A copy of the tank tabkle is included that is checked monthly and updated as needed.

9.4.1 Monthly Tank and Piping Inspection Form

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Appendix E Monthly Tank/ Piping Insp	ection Form						erceuse	a Turnes							en s		Louisgibia	nifeg net linear	ter Bartanan	Co Vision Reported	i ler		Response Topporen
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9.4.2 Weekly Tank Checklist

Water Plant Weekly Update Sheet

9.4.2 Tank Table



Enformal Environmental Solutions, LLC Pro-Treatment Facility Tampa Plorbia

D OIL TANK TABLE				
IANK NUMBER AND CAPACITY	LOCATER	TYPE (CONSTRUCTION STANDARD)	CONTRACT	DISCHARGE PREVENTION CONTAINABLE
	1			
	-	ge Oly Maler / PCM Tanks Abovegrand Hotor & Fall Artist		Controls Containment Placet a
Task #7 (0,110 pilles	TAKE CONTAINMENT PAIL SEEA	Tentes (LE142)	Hige City Water and PCW	(mgm
Test (FAS, 117 galaxy	TANK CONTADIMENT PAD AREA	Assegnand Hotselar Patienten Tariss (JL 142)	Rige Oly Water and POW	Conside Containment risks to gauges
	Raiser	and OS Treatment and Storage		
Task #7 (6,111 pallow)	TANK CONTAINMENT FAILUREA	Abevegrased restander Fat Bolton Tarixs (J. 163)	Restored Of Rental Treatment	Conside Containment Playet & gauges J Consider Sant
And the second second		Treated Woodenster		to the second second
Tag #1540,715 piles	TAKE CONTAINMENT FAIL SEEA	Abeveground Horotonitel Flat Roton	DAF Processed	Consule Contribution of Figure 1
		Tarita	Wedeneter DAP Processed	Constrate Containment Playad in
Test #110,000 gallers.	TANK CONTADIMENT FAD AREA	Aboveground Verbal Tenk	Wedenster	- India
			Used and Vign Dese	Consume Containment / Issuel In
Table 1,000 piles	TANK CONTAINMENT FAD AREA	Aboveground vierbail Tank	Fael Laured and Virgin Desail	gauges Conside Cartain with I taxed a
Task #7 3,050 galles Daved	TAKE CONTAINMENT MICHERA	Aboveground Vertilat Tens	Fuel	(any and
Test 6.8 5,000 pallos Danitins	TANK CONTADIMENT PAG ABBA	Alaberground Vertilat Tents	Lised and Virgin Genotice	Constelle Contrainment Playard in groupes
		age (Post Freedomid Postilly Interfact)		
DAP 3,000 galaxie	CONTAINANT BUILDING	Alsovegraund Haddonial Task Heveled on Concrete Pedelates	Sky Olymae	Concepts Containent Concepts Containment
Test # 23.1,300 gallers	CONTAGENT ASIA	Anovegnend Hordonial Term	Sign City Hollow	Concept Contract Building
Task #54 3,590 galaxie	PER TRAN TAKINT RULEDING CONTACIONEDIT AREA	Aboveground Vertical Tank	Elige City Mater	Inside Pro-Treatment Roliding Concerns Containment
Test #22 1,000 polices	PRE-TERA TARGET BUILDING	Abovegound Vertical Tells	Elga Oly Mater	Inside Pite Treatment Rubbing
and the second	CONTABOLENT ASSA			Durante Collaboration Inside Pre Treatment Ruliding
Tank #20.1,000 gallets	CONTAINMENT AREA HER TREA TARGET BUILDING	Aboveground Versial Taris	Sodun Hydroxie	Constrate Containment Inside Pite Treatment Relation
Task #71 1,000 gallers	CONTABAGENT AREA	Aboveground Versul Tenk	Perceident	Datasete Costatorest
Task 402 1,000 galless	CHILDREN THEN THEN THE ADDRESS AND ADDRESS AND ADDRESS AND ADDRESS	Aboveground Versian Tent	Congilett	Inside Pre-Treatment Building Concepts Contentinent
Growel Reliate Digest	BULL OFF FAD CONTADINENT AREA	Steaded Rule Of Term	Builge Oily Wester	English Pre-Treatment Holding Concerns Containment
and the second	Reed Marin	ge Non OE Storage (7 and Parts Pal)	10000	
Test Fill 1,000 julies	TANK CONTADIMENT PAG ABIA	Abovegound Verital Tent	Weideweider Stuperhalte	Concerns Controlsment
Test #14 100 galless	TANK CONTADIMENT FAD AREA	Aboveground Vertilan Tarix	Set Silve	Concerns Control and at
Tank Hill 1,000 gallers	TANK CONTADIMENT FAC MERA	Alloweground Vertilan Tank	Social Hydroxie	Concerns Containment
			Buffuth And	County Contribution
Task Fill 1,000 gallets	TAKE CONTAINABLY FAD KEEN	Alloweground Verifiail Tank	-Autoria Scott	Contrast Contraster and
	Time Tank	s & PRostlers Pare Through Tanks		
Pitelin Tail #1: Nigilien	OPPLOADEND CONTADMENT ASEA	Filter Tank (Temponery)	Bige City Mater	Concernite Contradisments
Firste Test #1 20 galars	OPPLOADERO CONTADMENTARES	Filter Tarix (Tempotery)	Hige Olymate	Concernin Contractment
	OPPLOADERD CONTADOMENT ASEA	Fine Texts (Temperary)	Skye City Mater	Concernin Confederated
Tests # 1, 20,000 gallers	STRANSFER SAME AND ADDRESS ADDR			
Test #1 20200 galless	OFFLOADING CONTADIMENT AREA	Figst Tank (Territorary)	All Contract	Concerts Control of the
Task # # 2000gdies	OPELONDRO CONTAGNERIT AREA	Fisst Tank (Temperary)	Rep Olymour	
		Fact Tank (Temponey) Fact Tank (Temponey) Fact Tank (Temponey)	Hige City Water	Concess Control of the Control of th

9.5 Tank Certification

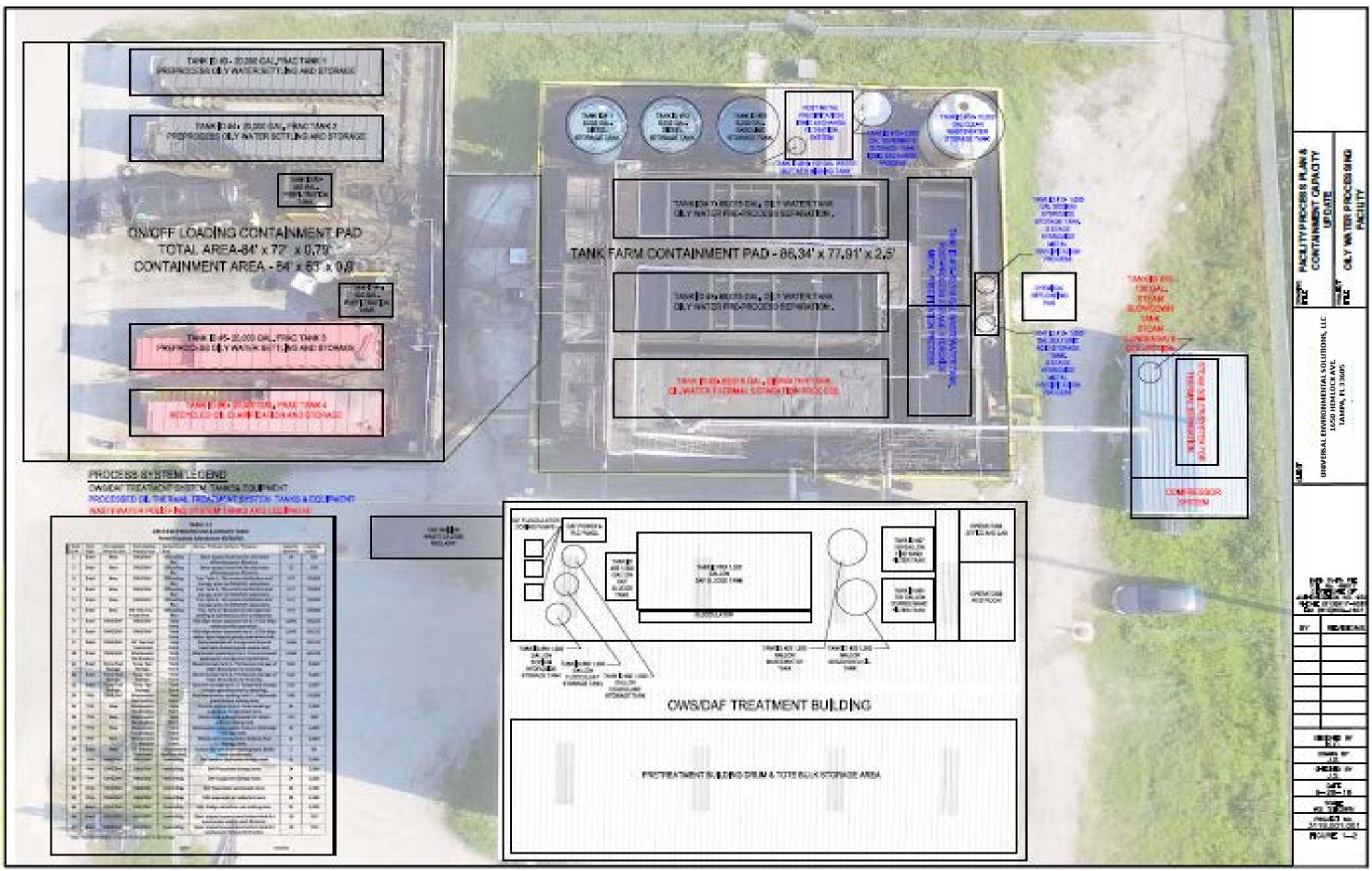
To comply with the requirements of the permit and 62-762 all tanks within the facility containment area over 550 gallons must meet standards detailed in the Approved Equipment List 62-762.500 FAC. Tank inspection forms have been implemented in December 2014. Records of inspection are maintained in laboratory and UES office.

9.5.1 Tank Certification – PCW Tanks 2019

¢	STORAGE TANK RE	ENVIRONMENTAL PROTECTION EGISTRATION PLACARD 018-2019
STCM ACCOUNT	70300	PLACARD NO: 543342
FACE.ITY ID	9814309	PLACARD ISSUED: 08/07/2018
FACILITY	UNIVERSAL ENVIRONMENTAL SOLUTIONS 1650 HEMLOCK ST TAMPA FL 33605 6602 HILLSBOROUGH COUNTY	PLACARD EXPIRES: 06/30/2019
FACILITY TYPE	Industrial Plant	TANK SYSTEMS REGISTERED: 4
ACCOUNT OWNER	UNIVERSAL ENVIRO SOLUTIONS 1650 HEMLOCK ST TAMPA FL 33605	
HASH	JW79XEIWKXEEXO The Storage Tank Registration placed m	out he resided at the facility
	It must be placed out of the weather and in plain vie	
Under Section 376.30 valid registration is di		isnary storage tank system that requires registration unless proof of
Acceptance of this pla	card constitutes agreement to operate the registered tasks in comp	bases with applicable Statutes and Department Rules.
The Web address for I	DEPARTMENT OF ENVIRONMENTAL PROT DEP is https://floridadep.gov	ECTION IS ON THE INTERNET
You can access the Sk Look under the "Stora	orage Tank Website by using https://floridadep.gov/waste/permitt ge Tank Compliance Quick Links" section to find the links to stor	ing-compliance-assistance/content/storage-task-compliance. rage task rules, forms, database reports and program information.
	CONTACT TANK REGIST	RATION BY
	EMAIL - Tank Registration 2 PHONE - (850) 245	jdep state fl na 8839

9.5.2 Recovered Oil Tank Exemption Application

The 10,000 gallon polyproplene tank that was exempt for oil usage has been repurposed and is no longer used for oil storage. As of January 1, 2017 the tank is being used for clarified wastwater for disposal to the local POTW.



ATTACHMENT 10 – CLOSURE PLAN

Revision 4 Attachment 10 Modifications - All pages have been modified, FDEP Closure Forms, S&A Proposal and Cost estimates have been updated. Tank Quantity table has been updated to reflect tank table. Rev 4 Page 173 has been updated and replaced.

The administrative rules promulgated pursuant to Rule Chapter 62-710 of the Florida Administrative Code (F.A.C) and Title 40 of the Code of Federal Regulations (CFR), Part 279. (h), Subpart G, establishes requirements for the closure and, if necessary, post closure care of oil processing and hazardous waste management facilities. All references to 40 CFR citations specified herein are adopted by reference in R 299.11003.

The information provided was used to prepare the closure and postclosure care cost estimate provide in Section 10.9, "Closure and Postclosure Care Cost Estimates."

10.1 Closure Performance Standard

[40 CFR 279.54(h)]

This Closure Plan is designed to ensure that the facility will be closed in a manner that achieves the following:

- a. Minimizes the need for further maintenance; and
- b. Controls, minimizes, or eliminates, to the extent necessary to protect human health and the environment, postclosure escape of nonhazardous wastes, waste and reclaimed oil constituents, leachate, contaminated runoff, or waste decomposition byproducts to the groundwater, surface water, or atmosphere; and, as applicable.
- c. Complies with the unit-specific closure requirements for each of the following units:

10.2 Unit-Specific Information (See Attachment 1 - Figure 1.3.1 for locations)

Unit Designation	Max Inventory	Closure	Dispose or
		Date	Recycle
Tank Farm	3–69,300 Gal Primary Treatment Tanks 1-		R
Containment Pad	48,600 Gal Primary Treatment Tank		R
Area	1- 10,000 Gal Used Oil Tank		D
	3- 5,000 Used and Virgin PCW Tanks		R
	6- Polyproplene Chemical and Dosing Tanks		D
Pre-treatment	1-1,000 Gal Settling Tank		D
Building Containment	1-1,000 Gal Recycled Oil Tank		D
Area	1- 1,000 Gal Sludge/Settled Solid Tank 1-		R
	1,000 Gal Flocculant Tank		n
	1- 1,000 Gal Sodium Hydroxide Tank		D
	1-1,000 Coagulant Tank		D
Lab Area	Non-hazardous Reagents		D

Table 10.2-1 - Waste Management Unit Information:

		- 0
Bulk Storage Area	Various Non-hazardous Drums and Totes	D
Truck Unloading	4- 20,000 Gal Frac Tanks 2- 500 gallon Filter Tanks	R
Containment Area	1- 10 Yard Roll-Off for Sludge Disposal	R
	Containment	R
Pipeline Area	800' 6"x10"x15" Triple contained HDPE Primary and Secondary with concrete pipe protection.	R

10.3 Closure Schedule

Has not determined when the facility will close and does not anticipate completing final closure of the entire facility prior to expiration of the facility's used oil processing operating license.

Closure Activity	Schedule
Initiate Closure; Cease Acceptance of Waste	Immediate
Process all equipment, piping and tanks in containment and Pre-treatment building containment area systems.	1 Week
Transfer all other waste off-site for disposal/recycling	1 Weeks
Transfer bulk wastes off-site to authorized disposal streams	1 Week
Process all liquids in containment pad tanks and pre-treatment building tanks	1 Week
Decontaminate equipment, pumps, piping and tanks on containment pad	2 Weeks
Decontaminate and Remove Equipment in Lab Room	1 Day
Decontaminate bulk storage area and pre-treatment area building containment area	2 Days
Decontaminate Surfaces in Pre-treatment Building, Containment Pad, Bulk Storage Area Bulk Storage Area and Containment Pad.	1 Week
Decontaminate and remove pumps, piping and all other equipment at facility.	4 Weeks
Sample Containment Area floors, Bulk Storage Area, Roll-Off, Sludge and Roll Off Truck Unloading Areas.	2 Weeks
Obtain P. E. Certification of Closure Performance	5 Days
Prepare and Submit Closure Report to DEP	4 Weeks

10.3.1 Notification and Time Allowed for Closure - Final closure activities will be initiated within 90 days of receipt of the final volume of hazardous wastes and completed within 180 days of receipt of the final volume of waste. The tasks and estimated time required for partial closure shall follow the schedule specified in **Section 10.3**. The DEP will be notified by the UES facility <u>60</u> days before final closure begins. Final closure will be certified by the UES owner and an independent, qualified, registered professional engineer of the state of Florida.

10.3.2 Extensions for Closure Time - In the event that an extension for closure for the facility or any unit is necessary, the UES facility will request an extension in accordance with the requirements of 40 CFR §279.54(h).

10.4 Unit-Specific Closure Procedures

Unit-specific closure procedures are provided for each unit identified in Section 10.2 of this document.

10.4.1 Closure of Concrete Containment Pad Areas and Bulk Storage Area - This section describes the procedures for closure of <u>Offloading Pad Area, Tank Farm</u> <u>Containment Pad Areas, Bulk Storage</u> <u>Area and the Pipeline Area</u>. The general closure requirement and specific closure procedures are discussed below.

10.4.1.A. General Closure Requirement - At closure, waste residues will be removed from the containment area systems and the bulk storage area. Remaining equipment contaminated with waste or waste residues will be decontaminated and removed.

10.4.1.B. Specific Closure Procedures - Specific procedures for inventory management, unit inspection, decontamination, sampling and analysis, and additional waste management are discussed below.

10.4.1.B.1 Inventory and Remedial Waste Management Procedures - A physical inventory check of all containers and equipment, tanks, piping, pumps in the Containment Pad will be completed and verified with the Preview system. All fuel and oil type wastes will be blended into the appropriate Tank Systems for transportation off-site for energy recovery. All remaining wastes will be shipped off-site for disposal and/or recycling.

10.4.1.B.2 Unit Inspection Procedures - A detailed inspection of each containment pad area and bulk storage area and wall will be completed. The inspection will document the location of spills, contamination and migration pathways. A similar inspection of the exterior walls of each containment pad will also be documented.

10.4.1.B.3 Decontamination Procedures - After inventory removal, the containment area and bulk storage area floors will be decontaminated. A surface cleaning technique (hydroblasting) will be used to decontaminate the surfaces of the concrete floors. The wash water and debris from the treatment is collected and separated. The solid

material is drummed for incineration or landfilling, and the water is recycled or collected for eventual bulk transportation to a permitted facility for proper management. All waste shall be p r o p e r l y manifested, labeled, and shipped as required by non-hazardous and hazardous waste regulations. These cleaning methods require a 3-man crew, high pressure pumps, and wash water holding tanks. Personnel o p e rating the t re at ment equipment require additional personal protection equipment due to the inherent hazards in this cleaning method. Where appropriate, temporary run-off controls will be constructed to contain wash water.

Following the surface treatment, a sample of the final water rinseate will be collected for analysis and comparison to the performance standards. In addition, concrete cores will be collected from the floors of the container management units. Based on the square footage of each containment unit, the following numbers of sample locations are planned:

Concrete Pad Management Unit	Approximate Area (sq. ft.)	Number of Samples
Tank Farm Containment Pad	6,080	5
Pre-treatment Building Containment Area	2000	3
Bulk Storage Area	4,600	4
Offloading Containment Pad	5,292	5

10.4.1.B.4 Sampling and Analysis Procedures - Sampling will be biased toward visibly stained locations since these locations represent the greatest possibility of discovering residual contamination. Concrete wipe samples, core samples and soils samples will be collected from areas that appear stained. The samples will be and transferred directly into appropriate containers and stored in ice packed coolers for transportation to the laboratory. Soil samples for VOC analysis will be preserved in the field with methanol per DEP and EPA Methods. The soil samples will be analyzed for volatile organic compounds and semi-volatile organic compounds (SVOCs) and RCRA metals. The results will be compared to the Cleanup Criteria. Any soils determined to be contaminated will be removed and transported offsite to a treatment or disposal facility licensed to accept wastes described by the waste codes of the source of the contamination. These cores will be analyzed for volatile organic compounds and semi-volatile organic compounds to demonstrate that the concrete has been decontaminated. The coring and sampling requires specialized equipment and a 2-man crew.

Soil samples will also be collected from beneath each of the concrete core locations using a stainless steel hand auger that will be decontaminated between sample locations. One sample will be collected from each location at the 0-1 foot depth below the concrete surface and transferred directly into appropriate containers and stored in ice packed coolers for transportation to the laboratory.

In the event soil samples exceed the Soil Cleanup Target Criteria, monitoring wells will be installed and sampled at the location of the soil boring. The groundwater monitoring wells will be sampled based on the results of the soil sample. The samples will be tested for the same analyses of soil samples.

10.4.1.B.5 Additional Waste Management Procedures - Decontamination waste sand materials that cannot be decontaminated will be characterized, containerized and shipped off-site for disposal and/or recycling.

10.4.1.B.6 Other Control Procedures - Prior to initiating decontamination procedures, the site will be 'prepped' to maintain run- on and run-off control. The facility connection to the City of Tampa POTW sewer collection system will be closed to prevent unintended contaminated liquids to enter the system. All portable equipment to be decontaminated will be moved to an existing containment pad areas prior to initiating the decontamination process to prevent run-off of rinseates. Plastic sheeting or other suitable barrier will be erected along the containment wall where necessary to contain any overspray within the secondary containment structure.

All portable/dismantled decontaminated equipment/structures will be moved to a containment area away from the decontamination areas to prevent run-on of contaminated liquid. All sheeting will be containerized and transported off-site as a non-hazardous waste. All barriers utilized will be decontaminated and transported off-site to a metal recycler or solid waste disposal facility.

10.4.2 Closure of Roll Off and Truck Unloading Areas, Pre-treatment Building Laboratory and Pipeline Area- This section describes the procedures for closure of laboratory area. The general closure requirement and specific closure procedures are discussed below.

10.4.2.A. General Closure Requirement - At closure of the Lab and the Unloading and Roll Off Areas at the UES facility will remove or decontaminate all waste residues, contaminated containment system components (liners, etc.), contaminated soils, and structures and equipment contaminated with waste.

10.4.2.B. Specific Closure Procedures - Specific procedures for inventory management, unit inspection, decontamination, sampling and analysis, and additional waste management are discussed below.

10.4.2.B.1 Inventory and Remedial Waste Management Procedures - All flowable wastes the Roll Off will be transported off-site for energy recovery or incineration.

10.4.2.B.2 Unit Inspection Procedures - A detailed inspection of the laboratory floor will be completed. The inspection will document the location of spills, contamination and migration pathways. A similar inspection of the roll off pad and truck unloading areas will also be documented.

10.4.2.B.3 Decontamination Procedures - The roll off and associated piping will then be flushed with appropriate compatible cleaning solutions to reduce any liquid, solid or clinging waste residues. The resulting residues will either be collected into containment area and sent to a suitably permitted recycling facility, or transported off site to authorized facilities for reclamation, treatment and/or disposal at other authorized facilities.

The remaining components of the piping system will then either be decontaminated on site utilizing methods described in Table 1 of 40 CFR 268.45, Laboratory equipment not $02\ 1\ 1$

opened will be reused, laboratory equipment open or with containers that have been compromised will be placed into containers and transported offsite to an authorized facility for reclamation, treatment and/or disposal.

Waste residues will be removed from roll-off by flushing and steam cleaning. Steam cleaning is a proven technique for decontaminating surfaces and mobilizing heavier liquids.

10.4.B.4 2 Sampling and Analysis Procedures - Sampling will be biased toward visibly stained locations in the laboratory, roll off pad and unloading areas. Concrete wipe samples will also be collected from areas that appear stained. The samples will be and transferred directly into appropriate containers and stored in ice packed coolers for transportation to the laboratory. Soil samples for VOC analysis will be preserved in the field with methanol per DEP and EPA Methods. The soil samples will be analyzed for volatile organic compounds and semi-volatile organic compounds (SVOCs) and RCRA metals. The results will be compared to the Cleanup Criteria. Any soils determined to be contaminated will be removed and transported offsite to a treatment or disposal facility licensed to accept wastes described by the waste codes of the source of the contamination.

In the event soil samples exceed the Soil Cleanup Target Criteria, monitoring wells will be installed and sampled at the location of the soil boring. The groundwater monitoring wells will be sampled based on the results of the soil sample. The samples will be tested for the same analyses of soil samples.

Lab and Soils Management	Approximate Area (sq. ft.)	Number of
Unit		Samples
Roll Off and Truck Unloading Areas	1,200	2
Pre-treatment Building Laboratory Area	200	1
Pipeline Area	800 linear Feet	5

10.5 Certification of Closure

Within 60 days of completion of closure UES will submitted the Director, by registered mail, a certification that the facility, as applicable, has been closed in accordance with the specifications in the approved closure plan. The certification will be signed by UES and by an independent registered professional engineer. Documentation supporting the independent registered engineer's certification will be furnished to the Director in accordance with FAC requirement including:

- 1. The results of all sampling and analysis;
- 2. Sampling and analysis procedures;
- 3. A map showing the location where samples were obtained;

- 4. Any statistical evaluations of sampling data;
- 5. A summary of waste types and quantities removed from the site and the destination of these wastes; and
- 6. If soil has been excavated, the final depth and elevation of the excavation and a description of the fill material u sed.

The UES facility will maintain financial assurance for closure until the Director releases the UES facility from the financial assurance requirements for closure. *The certification must be worded as follows:*

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 gather and evaluate 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 be 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 for knowing violations.

10.6 Postclosure Notices Filed

The applicant must provide documentation that the postclosure notices required under 40 CFR §265.310 have been filed for hazardous waste disposal units that have been closed at the facility.

10.7 POSTCLOSURE PLAN

10.7.1 Applicability - Not applicable: Hazardous waste is not being stored at the facility. In addition waste will not be left behind at closure. A survey plat, postclosure care, postclosure certifications, and other notices are not required.

10.8 Applicability - Not applicable

Hazardous waste is not being stored at the facility. In addition waste will not be left behind at closure. A survey plat, postclosure care, postclosure certifications, and other notices are not required.

10.9 Closure Cost Estimate

Attached is the Used Oil Processing Facility Closing Cost Estimate Form and contractors cost estimate and proposal.

11211

FROIL FROILETION					_	201 X040211-01
FLORIDA		r • 2600 Blair Stone	Road • Tallahasse	e, Florida 32399-240		P Form #82-710.901(7) m Title <u>Used Oil Processing Facility</u> vsing Cost Estimate Form cellve Date 4-23-13 orporeted in Rule 62-710.800(6)(b)
	Used Oil Pr	ocessing	Facility C	losing Cos	st Estin	nate Form
_{Date:} 02/14/20	018		Date of DE	P Approval:	<u></u>	(DEP use only)
	RMATION: Latitud				PA ID Numi	per:FLR 000 199 802
Facility Name: Ur	niversal Enviro	onmental So	plutions, LL	<u> </u>	Permit Numb	oer:
7.4. Another that is a second of the second of the second s	650 Hemlock					
Mailing Address: _	P.O. Box # 761	05 / Tampa	a, FL. 3367	7 5		
Contact Person's N	ame: Ed Kinley			Phone Number:	813-24	1-9206 X 301
	@uestampa.c				813-24	an area an area an area an
5. 5. 5.	NCIAL ASSURANCE	30C 78k				
Letter of Cre	X			Guarantee Bond	1*	*Indicate mechanisms that
Insurance C	certificate	Financial Test		Trust Fund Agre	ement	require use of a Standby Trust Fund Agreement
current dollars. Est of cost estimate adj	/ be adjusted by usin imates are due annu ustment below. Factor Adjustment	ally between Jar				
and no changes ha inflation factor is de Department of Com annual Deflator by t	t using an inflation fa ve occurred in the fa rived from the most imerce in its survey o the Deflator for the p or at (850) 245-8732	cility operation w recent Implicit Pr of Current Busine revious year. Th	hich would neces ice Deflator for C ess. The inflation e inflation factor	ssitate modificatio Bross National Pro 1 factor is the resu may also be obta	on to the close oduct publision alt of dividing ined from the	sure plan. The hed by the U.S. I the latest published e Solid Waste
This adjustment is t	pased on the Depart	ment approved c	losing cost estim	ate dated:	and and an an	
238,564.84	X	1.013	=	241,666.1		
Latest DEP approve Closing Cost Estimation		Current Year Inflation Facto	r	Inflation Adjust Annual Closing		ate
Signature:	.1-1.	-1	Phone	813-241-9	206 X 3	01
Name and Title:	d Kinley (Pres	sident)	E-mail:	ekinley@u	iestamp	a.com
If you have question phone at (850) 245-	ns concerning this fo -8781, or by e-mail a	rm, please conta t: Bheem.Kothur	ct the Used Oil F @dep.state.fl.us	ermitting Coordir	nator at the a	ddress below, by
Please mail this co	ompleted cost estin	nate to:	Please e-mail c	or mail a copy of	the cost es	timate to:
Used Oil Permitting				ancial.Coordinate	or@dep.state	e.fl.us
Florida Department 2600 Blair Stone Ro Tallahassee, FL 32		otection		ancial Coordinato e Road MS 4565	r - FDEP	

Tallahassee, FL 32399-2400

l of 3

(b) Recalculated Cost Estimates (complete items IV and V)

IV. RECALCULATIONS OF CLOSING COSTS

For the time period in the facility's operation when the extent and manner of its operation makes closing most expensive.

¥.

Third Party Estimate/Quote must be provided for each item. Costs must be for a third party providing all materials and labor.

				1000 C	NO 10 10 10 10 10
DESCRIPTION	UNIT	QUANTITY	UNIT COST	TOTAL	

1. Decontamination and Disposal

 \mathbf{z}

Note: These costs must be broken down by individual waste stream. If contamination is found, the cost estimate must be recalculated to include remediation costs.

a. Used Oil Tanks, containers, piping,

equipment and secondary containers, piping, equipment and secondary containmen decontamination waste characterization disposal	TANKS TANKS GAL	<u>5</u> <u>5</u> 384,743	9 5,000 600 40,00	925,000 93000 976,948
b. Wash Water waste characterization disposal	Lunp GA)	22,000	1600	44400
c. Sludges/Sediment waste characterization disposal	LUMP	10,000	4600 41.00	4600 410,000
d. Used Oil Filter Management waste characterization disposal	TONS		4600 \$100	\$600 \$500
e. Petroleum Contaminated Water (Petroleum Containers, piping, equipement secondary containment waste characterization disposal		9	650	95,850 93,000
f. Mobilization Costs	LUMP		44350	A4,350
g. Other <u>TANK REMOJAL</u>	- TANK	16	93,900	<u>962,40</u> 2

Subtotal (1) Decontamination/Disposal:

1197,249

2. Engineering (On-site Inspections and Quality Assurance are to be included in this item).

- a. Closure sampling and analysis plan implementation as described in the permit application
- b. Closure Certification Report

1

Subtotal (2) Professional Services:

F 11,347 97661 921,008 9218,257

Subtotal of (1) and (2) Above:

3. Contingency (10% of the Subtotal)

TOTAL CLOSING COST:

1

\$240,083

V. CERTIFICATION BY ENGINEER and OWNER/OPERATOR

This is to certify that the Closing Cost Estimates pertaining to the engineering features of the this used oil processing facility have been examined by me and found to conform to engineering principals applicable to such facilities. In my professional judgment, the Cost Estimates are a true, correct and complete representation of the financial liabilities for closing of the facility, and comply with the requirements of Florida Administrative Code (F.A.C.) Rule 62-710 and all other Department of Environmental Protection rules, and statutes of the State of Florida. It is understood that the Closing Cost Estimates shall be submitted to the Department annually between January 1 and March 1 of each year and revised, adjusted and updated as required by Rule 62-710.800(6)(c), F.A.C.

Signature of Engineer	Signature of Owner/Operator Ed Kinley (President)
Engineer's Name and Title (please print or type)	Owner/Operator's Name and Title (please print or type)
	813-241-9206 X 301
Florida Registration Number (please print or type)	Owner/Operator's Telephone Number
	ekinley@uestampa.com
Engineer's Mailing Address	Owner/Operator's E-mail Address
Engineer's Telephone Number	

Engineer's E-mail Address



Plant Closure Estimate Worksheet – Updated Revision 3

1 a. USED OIL TANKS (includes all four AST process tanks + one dedicated Used Oil Tank) = 384,743 gallons

- Assumes all five tanks are full...266,500 gallons X .25 per gallon T & D
- Analysis of each tank (Metals / Volatiles / Semi-Volatiles)
- Decontamination...five tanks X \$5,000.00 per.

1 b. WASH WATER

- Assumes Contractor will generate 5,000 gallons per tank of rinseate in the four process tanks + 2,000 gallons of rinseate in oil Tank = 22,000 gallons of Non-Hazardous "wash water".
- One laboratory test (Metals / Volatiles / Semi-Volatiles) of bulk "wash water"

1 c. SLUDGES / SEDIMENT

• Assumes 1,250 gallons of non-processible tank bottom sludge in each of the four process, each of the 4 frac tanks = 10,000 gallons.

1 d. USED OIL FILTERS

- Assumes 5 tons of Non-Hazardous incineration (City of Tampa McKay Bay)
- One laboratory test (Metals / Volatiles / Semi-Volatiles)

1 e. PCW TANKS & PIPING

- Assumes all three Diesel & Gasoline tanks are full (15,000 gallons total)
- One laboratory test (Metals / Volatiles / Semi-Volatiles / Flash)

1 f. MOBILIZATION

• Assumes local environmental services contractor and delivery of equipment to perform closure activities.

1 g. OTHER

Assumes removal of 16 tanks (4) Frac Tanks (4) Empty Process tanks / (1) Used Oil tank / (3) PCW tanks (2) Filtration Tanks (2) Polyproplene Tanks..



Seavy & Associates, Inc. 2608 South 86th Street, Suite B, Tampa, Florida 33619 • (813) 363-0862, Fax (813) 630-1607 • www.seavyassociates.com



November 1, 2018

Mr. Ed Kinley Universal Environmental Solutions 1650 Hemlock Street Tampa, Florida 33605

Re: Used Oil Processing Facility Closing Cost Estimate

Dear Mr. Kinley:

As requested, Seavy & Associates, Inc. (S&A) has prepared this proposal to provide labor, equipment, and materials for closure of the Used Oil Processing Facility. The scope of work and cost estimate is included with this proposal.

Task 1 – Used oil Tanks, Containers, Piping, Equipment and Secondary Containment Decontamination

- The tanks will have samples collected for a waste characterization for disposal.
- S&A will contract a certified used oil disposal facility to remove and dispose of any oil liquids from the tanks.
- The tanks will be pressure washed utilizing a hot water pressure washer and degreaser to decontaminate tanks, containers, piping, equipment and secondary containment.
- Utilizing a roll-off piping, containers and equipment will be disposed.

Task 2 – Wash Water

- After cleaning of the tanks is completed, the tanks wash water will be sampled for a waste characterization.
- S&A will contract a certified disposal facility to remove and dispose of the wash water generated for the tank cleaning.

Task 3 - Sludge's/Sediment

- After the tanks have been emptied of oil, before cleaning, any sludge/sediment remaining in the tanks will be sampled for a waste characterization.
- S&A will contract a certified disposal facility to remove and dispose of any sludge/sediment left in the tanks.

Task 4 – Used Oil Filter Management

- Samples will be collected from the used oil filters to generate a waste characterization.
- S&A will contract a certified disposal facility to collect and dispose of the used oil filter material.



Seavy & Associates, Inc. 2608 South 86th Street, Suite E. Tampa, Florida 33619 • (813) 363-0862, Fax (813) 630-1607 • www.seavyassociates.com

Mr. Ed Kinley November 1, 2018 Page 2 of 2

Task 5 – Petroleum Contaminated Water (PCW), Tanks, Containers, Piping, Equipment and Secondary Containment

- After cleaning of the tanks is completed, the tanks wash water will be sampled for a waste characterization.
- S&A will contract a certified disposal facility to remove and dispose of the wash water generated for the tank cleaning.

Task 6 – Mobilization

• S&A will Mobilize all needed tools, equipment and supplies and set up a decontamination area prior to starting closure activities.

\Task 7 - Tank(s) Removal

• S&A will utilize a crane to load clean tanks onto flatbed trucks for recycling/disposal of tanks.

Task 8 - Closure Sampling and Analysis Plan Implementation

- S&A will develop a sampling plan based on the UES used oil processing facility closing cost estimate form.
- Samples will be collected and analyzed by a NELAC Certified Laboratory. The analytical data will be
 used to create waste characterization forms to allow for proper disposal as outline through tasks 1-5.

Task 9 - Closure Certification Report

• S&A will create the Closure Certification Report upon completion of all closure activities.

We can complete these activities for the turn key cost of \$241,666.18. Please review the attached spreadsheet for details and assumptions. If you have questions or need additional information, please do not hesitate to contact me at \$13-917-9267.

Very truly yours, SEAVY & ASSOCIATES, INC.

Jone M Long

Jim Seavy, President

Universal Environmental Solutions, LLC Seavy & Associates, Inc. is authorized to initiate service per this Proposal, General Assumptions, Exhibit A as of

_____, 2018.

Ву:_____

Title:

Date: _____



Project Name UES Tampa Plant

ues Pre-Treatment Plant Closure Update 11/01/18

PLEASE READ AND UNDERSTAND ALL ASSUMPTIONS, SIGNATURE OF THE CONTRACT WILL ASSUME THE CLIENT HAS READ AND APPROVED OF ALL ASSUMPTIONS. <u>Tasks:</u>
1. Used Oil Tanks Containers Piping Equipment and Secondary Containment Decontamination

- 2. Wash Water Disposal
- 3. Sludge/Sediment Disposal

4. Used Oil Filter Management

5. PCW Disposal for Tanks, Containers, Piping, Equiperant and Secondary Containment Disposal

- 6. Mobilization Costs
- 7. Tank Removal
- 8. Closure Sampling and Analyses Plan Implementation
- 9. Closure Certification Report

Quote Date: November 2, 2018

		/ Unit	Used Oil 1 Equipment a	3 Days Task 1 Tanks Containers Piping nd Secondary Containment econtamination	00000	1 Day Task 2 sh Water Disposal	1.221	<u>3 Days</u> Ta sk 3 ge'Sediment Disposal	4 Days Used Oi	Task 4 il Filter Management	Contai	Task 5 W Disposal for Tanks, iners, Piping, Equipennt secondary Containment Disposal		2 Days Task Ó Mobilization Costs	3	Task 7 Tank Removal		Task S sure Sampling and Analyses Plan Implementation	Task9 Closure Certi Report	fication	;	TOTAL
Labor Category	Rate	/ Chit	Hrs	Dollars	Hrs	Dollars	Hrs	s Dollar s	Hrs	Dollars	Н	rs Dollars	Hrs	s Dollars	Hrs	Dollars	Hrs	s Dollars	Hrs	Dollars	Hrs	Dollars
Officer P.E.	\$121.00	/ hr	0	0.00	0	0.00	0	0.00	0	0.00		0.00	0	0.00	0	\$0	16	6 \$1,936	18	\$2,178	34	\$4,114.00
Technical Associate	\$86.00	/ hr	0	0.00	0	0.00	0	0.00	0	0.00		0.00	0	0.00	0	\$0	C	D \$0	12	\$1,032	12	\$1,032.00
Electrician	\$108.00	/ hr	0	0.00	0	0.00	0	0.00	0	0.00		0.00	0	0.00	0	\$0	C	D \$0	0	\$0	0	\$0.00
Supervisor	\$66.00	/ hr	40	2,640.00	8	528.00	8	528.00	8	528.00		8 528.00	8	528.00	8	\$528	C	D \$0	0	\$0	88	\$5,808.00
Operator	\$60.00	/ hr	0	0.00	0	0.00	0	0.00	0	0.00		0.00	0	0.00	0	\$0	0	D \$0	0	\$0	0	\$0.00
Technician/Admin	\$52.00	/ hr	100	5,200.00	6	312.00	0	0.00	0	0.00		0 0.00	16	5 832.00	16	\$832	8	8 \$416	20	\$1,040	166	\$8,632.00
CADD	\$67.00	/ hr	n	0.00	0	0.00	n	0.00	n	0.00		0 0 00	0	0.00	0	\$0	16	6 \$1.072	16	\$1.072	32	\$2,144.00
Total Labor		14	140	\$7,840.00	14		8	\$528.00	48			8 \$528.00	24		24	1,360.00	40		66	5,322.00	372	\$2,144.00
Profit & Overhead	\$0.00			0.00		0.00		0.00		0.00		0.00		0.00								0.00
Tot. Dir. Labor (fully loaded)				7,840.00		\$40.00		528.00		528.00		528.00		1,360.00	24	\$1,360	40	\$3,424	66	\$5,322		21,730.00
Non-Priced Items (NPI)		-		Task 1	. 1	Task 2	-	Task 3	1.21	Task 4		Task 5	121	Task ó		Task 7		Task 8	Task 9		2.02	
Directs (18%)		/ Unit	Qty	Dollars	Qty	Dollars	Qty	Dollars	Qty	Dollars	Qty		Qty		Qty		Qty		ty Do	ollars	Qty	Dollars
Crane for Tank Removal	\$1,559.95	/ Day	0	0.00	0	0.00	0	0.00	0	0.00	,	0.00	0	0.00	1	\$1,560	C	D \$0	0	\$0	1	1,559.95
Misc Directs/Phone/CC	\$200.00	/ LS	0	0.00	0	0.00	0	0.00	0	0.00		00	0	0.00	0	\$0	0	D \$0	0	\$0	0	0.00
Mileage	\$0.63	/ Mile	244	153.72	0	0.00	0	0.00	0	0.00		0.00	0	0.00	0	\$0	20	\$13	0	\$0	264	166.32
Tool Trck	\$30.00	/ Day	5	150.00	0	0.00	0	0.00	0	0.00		0.00	0	0.00	0	\$0	0	\$0	0	\$0	5	150.00
Pressure Washer	\$125.00	Day	6	750.00	0	0.00	0	0.00	0	0.00		0.00	0	0.00	0	\$0	C	0 \$0	0	\$0	6	750.00
Degreaser	\$58.00	Per	20	1,160.00	0	0.00	0	0.00	0	0.00		0.00	0	0.00	0	\$0	C	\$0	0	\$0	20	1,160.00
Pump	\$100.00	/ Day	5	500.00	0	0.00	0	0.00	0	0.00		0.00	0	0.00	0	\$0	C	D \$0	0	\$0	5	500.00
Used Oil/Washwater Disposal	\$0.20	/ Per	384 74 3	76,948.60	22000	4,400.00	0	0.00	0	0.00		0.00	0	0.00	0	\$0	C	\$0	0	\$0	406,743	81,348.60
Waste Charecterization	\$600.00	/ Per	5	3,000.00	1	600.00	1	600.00	1	600.00		0.00	0	0.00	0	\$0	C	D \$0	0	\$0	8	4,800.00
H&S Fluids	\$30.00	/ Day	5	150.00	0	0.00	0	0.00	0	0.00		0.00	0	0.00	0	\$0	C	D \$0	0	\$0	5	150.00
Sludge/Sediment Disposal	\$1.00	/ Per	0	0.00	0	0.00	5000	5,000.00	5	5.00		0.00	0	0.00	0	\$0	C	\$0	0	\$0	5,005	5,005.00
Used Oil Filter Dispsal	\$100.00	/ Ton	0	0.00	0	0.00	0	0.00	0	0.00		0.00	0	0.00	0	\$0	1	\$0	0	\$0	0	0.00
PCW Waste Charecterization	\$500.00	/ Per	0	0.00	0	0.00	n	0.00	0	0.00		3 1,500.00	0	0.00	0	\$0	6	n ŝn	0	\$0	3	1,500.00
PCW Water Disposal	\$0.20	/ Per		0.00	0	0.00	0	0.00	0	0.00	1500	Y and the second second	0	0.00	0	\$0 \$0		5 5 0		\$0	15 000	3,000,00
Mobilization Cost	\$4,345.00	/ LS		0.00	0	0.00		0.00	0	0.00	1900	0 0.00	1	4.345.00	0	\$0 \$0	L 0	5 \$0 8 \$0	1	\$4,345	10,000	43.450.00
Tank Removal	\$4,343.00	/ Der	4	3,700.00	0	0.00		0.00	0	0.00		0 0.00	1	4,545.00	12	\$0	-	s 50 50	-	\$4,343	10	43,430.00
		/ Per / LS		3,700.00	U	0.00		0.00	0	0.00		0 0.00	0	0.00	12	\$44,400 \$0			0	\$U \$0		
Closure Sampling & Aalyses Implementation	\$6,225.00	na ann			0	1			0	1	_		U 0				1	1 \$6,225	21.00	10.00	1	6,225.00
Report Repo	\$0.80	/ Sheet		0.00	0	0.00	0	0.00	0	0.00		0 0.00	0	0.00	U	\$0			2100	\$1,680	2,100	1,680.00
Roll-Off	\$350.00	/ Per	0	0.00 \$86,512	0	0.00 \$5,000	0	0.00	0	0.00 \$605		0 0.00 \$137,560	0	0.00	0	\$0 \$45,960	0	D \$0 \$6,238	0	\$0 \$6,025	0	0.00
Profit & Overhead (20%)	n			\$00,212		φ <i>υ</i> ,000		\$5,000				\$137,00U		\$4,343		\$H0,900		\$0,200	-	a0,020		0.00
Subtotal NPI			\$0.	86,512.32		5,000.00		5,600.00		605.00		4,500.00		4,345.00		45,959.95		6,237.60		6,025.00		199,544.87
Markup (10%)	0			0.00	L.	0.00		0.00		0.00	_	0.00		0.00		0.00		0.00		0.00		0.00
Total NPI				\$86,512.32		\$5,000.00		\$5,600.00		\$605.00	_	\$4,500.00		\$4,345.00		\$45,959.95	_	\$6,237.60	_	\$6,025.00		\$199,544.87
																						\$219,055.56
TOTAL AMOUNT				\$94,352,32		\$5,840.00		\$6.128.00		\$1.133.00		\$5.028.00		\$5,705.00		\$47.319.95		\$9,661,60		\$11.347.00	1	

DEP Form # 62-701.900(5)(h)	
Form Title SW Fac. Standby Trust	Fund Agreement
Form Effective Date Eebruary 15. 2	2015
Incorporated in Rule 62-701 630/6	1

STATE OF FLORIDA SOLID WASTE FACILITY STANDBY TRUST FUND AGREEMENT

Check Appropriate Box(es):	Closing	Long-Term Care	Corrective Action				
TRUST AGREEMENT, the '	'Agreement," e	ntered into as of	March 12, 2015	, by and between			
Universa	Environmenta	Solutions, LLC	, a	Florida			
	Name of Owner or Op	erator		Name of State			
Limited Liability Corporation	, the "Grar	tor." and	Salem Trust Comp	any			
Legal Entity Type (e.g., corporation, partnershi			Name of Corporate Tru				
	1715 N. Wes	tshore Blvd. Suite 750 T	ampa, FL 33607				
		Address of Corporate Trustee					
incorporated in the state of	, the "Trustee," f	, the "Trustee," for account number					

Insert above "incorporated in the state of [state]" or "a national bank"

Mail Document and Statements to: Solid Waste Financial Coordinator Florida Department of Environmental Protection 2600 Bilairstone Road MS 4548 Tallahassee, Florida 32399-2400

WHEREAS, the Florida Department of Environmental Protection (FDEP), an agency of the state of Florida, has established certain regulations applicable to the Grantor, requiring that an owner or operator of a solid waste management facility shall provide assurance that funds will be available when needed for the "Required Action" of the facility,

WHEREAS, the Grantor has elected to establish a trust to provide all or part of such financial assurance for the facilities identified herein,

WHEREAS, the Grantor, acting through its duly authorized officers, has selected the Trustee to be the trustee under this agreement, and the Trustee is willing to act as trustee,

NOW, THEREFORE, the Grantor and the Trustee agree as follows:

Section 1. Definitions. As used in this Agreement:

- (a) The term "Grantor" means the owner or operator who enters into this Agreement and any successors or assigns of the Grantor.
- (b) The term "Trustee" means the Trustee who enters into this Agreement and any successor Trustee.
- (c) The term "FDEP" means the Florida Department of Environmental Protection, an Agency of the state of Florida or any successor thereof.
- (d) The term "Required Action," as used in this document means closing, long-term care, or corrective action, or any combination of these, which is checked above.

Section 2. Identification of Facilities and Cost Estimates. This Agreement pertains to facilities identified on the attached <u>Schedule A</u>. Current FDEP approved cost estimates and source of payments into the fund will be the basis for determining amounts designated for facilities covered by this Agreement.

On <u>Schedule A</u>, for each facility list the FDEP identification number, facility name, site address, and current facility cost estimate (total of Required Action amounts). Schedule A does not need to be updated when cost estimates change unless a facility is using the pay-in period. Schedule A cost estimate increases do not required FDEP approval.

Section 3. Standby Trust. This Trust shall remain dormant until funded with the proceeds from financial instrument(s) as directed by the FDEP or from any other source. The Trustee shall have no duties or responsibilities beyond safekeeping this document and annually submitting to FDEP a valuation statement. Upon funding, this Trust shall become active and be administered pursuant to the terms of this instrument.

DEP Form 62-701.900(5)(h)

Page 1 of 4

Attachment 10 Revision 2 Page 163

<u>Section 4. Establishment of Fund.</u> The Grantor and the Trustee hereby establish a trust fund (the Fund), for the benefit of the FDEP. The Grantor and the Trustee intend that no third party have access to the Fund except as herein provided. Any property transferred to the Trustee is referred to as the Fund, together with all earnings and profits thereon, less any payments or distributions made by the Trustee pursuant to this Agreement. The Fund shall be held by the Trustee, IN TRUST, as hereinafter provided. The Trustee shall not be responsible nor shall it undertake any responsibility for the amount or adequacy of, nor any duty to collect from the Grantor, any payments necessary to discharge any liabilities of the Grantor established by the FDEP.

Section 5. Payment for Closure, Post-Closure Care, and Corrective Action. The Trustee shall make payments from the Fund as the FDEP Secretary, or the Secretary's designee (the "designee"), shall direct, in writing, to provide for the payment of the costs of Required Action of the facilities covered by this Agreement. The Trustee shall reimburse the Grantor or other persons as specified by the FDEP Secretary, or designee, from the Fund for Required Action expenditures in such amounts as the FDEP Secretary, or designee, shall direct in writing. In addition, the Trustee shall refund to the Grantor such amounts as the FDEP Secretary, or designee, specifies in writing. Upon refund, such funds shall no longer constitute part of the Fund as defined herein.

Section 6. Payments Comprising the Fund. Payments made to the Trustee for the Fund shall consist of cash or securities acceptable to the Trustee and may consist solely of proceeds from financial instrument(s) as directed by the FDEP.

Section 7. Trustee Management. The Trustee shall invest and reinvest the principal and income of the Fund and keep the Fund invested as a single fund, without distinction between principal and income, in accordance with general investment policies and guidelines which the grantor may communicate in writing to the Trustee from time to time, subject, however, to the provisions of this Section. In investing, reinvesting, exchanging, selling, and managing the Fund, the Trustee shall discharge his duties with respect to the trust fund solely in the interest of the beneficiary and with the care, skill, prudence, and diligence under the circumstances then prevailing which persons of prudence, acting in a like capacity and familiar with such matters, would use in the conduct of an enterprise of a like character and with like aims; except that:

- (a) Securities or other obligations of the Grantor, or any other owner or operator of the facilities, or any of their affiliates as defined in the Investment Company Act of 1940, as amended, 15 U.S.C. 80a-2.(a), shall not be acquired or held, unless they are securities or other obligations of the Federal or a State government;
- (b) The Trustee is authorized to invest the Fund in time or demand deposits of the Trustee, to the extent insured by an agency of the Federal or a State government; and
- (c) The Trustee is authorized to hold cash awaiting investment or distribution uninvested for a reasonable time and without liability for the payment of interest thereon.

Section 8. Commingling and Investment. The Trustee is expressly authorized in its discretion:

- (a) To transfer from time to time any or all of the assets of the Fund to any common, commingled, or collective trust fund created by the Trustee in which the Fund is eligible to participate, subject to all of the provisions thereof, to be commingled with the assets of other trusts participating therein; and
- (b) To purchase shares in any investment company registered under the Investment Company Act of 1940, 15 U.S.C. 80a-1 et seq., including one which may be created, managed, underwritten, or to which investment advice is rendered or the shares of which are sold by the Trustee. The Trustee may vote such shares in its discretion.

Section 9. Express Power of Trustee. Without in any way limiting the powers and discretions conferred upon the Trustee by the other provisions of this Agreement or by law, the Trustee is expressly authorized and empowered:

- (a) To sell, exchange, convey, transfer, or otherwise dispose of any property held by it, by public or private sale. No person dealing with the Trustee shall be bound to see to the application of the purchase money or to inquire into the validity or expediency of any such sale or other disposition;
- (b) To make, execute, acknowledge, and deliver any and all documents of transfer and conveyance and any and all other instruments that may be necessary or appropriate to carry out the powers herein granted;

DEP Form 62-701.900(5)(h)

Page 2 of 4

- (c) To register any securities held in the Fund in its own name or in the name of a nominee and to hold any security in bearer form or in book entry, or to combine certificates representing such securities with certificates of the same issue held by the Trustee in other fiduciary capacities, or to deposit or arrange for the deposit of such securities in a qualified central depository even though, when so deposited, such securities may be merged and held in bulk in the name of the nominee of such depository with other securities deposited therein by another person, or to deposit or arrange for the deposit of any securities issued by the United States Government, or any agency or instrumentality thereof, with a Federal Reserve bank, but the books and records of the Trustee shall at all times show that all such securities are part of the Fund;
- (d) To deposit any cash in the Fund in interest-bearing accounts maintained or savings certificates issued by the Trustee, in its separate corporate capacity, or in any other banking institution affiliated with the Trustee, to the extent insured by an agency of the Federal or a State government; and
- (e) To compromise or otherwise adjust all claims in favor of or against the Fund.

Section 10. <u>Taxes and Expenses</u>. All taxes of any kind that may be assessed or levied against or in respect of the Fund and all brokerage commissions incurred by the Fund shall be paid from the Fund. All other expenses incurred by the Trustee in connection with the administration of this Trust, including fees for legal services rendered to the Trustee, the compensation of the Trustee to the extent not paid directly by the Grantor, and all other proper charges and disbursements of the Trustee shall be paid from the Fund.

Section 11. Annual Valuation. The Trustee shall annually, at least 30 days prior to the anniversary date of establishment of the Fund, furnish to the Grantor and to the Secretary of the FDEP, or designee, a statement confirming the value of the Trust. Any securities in the Fund shall be valued at market value as of no more than 60 days prior to the anniversary date of establishment of the fund. The failure of the Grantor to object in writing to the Trustee within 90 days after the statement has been furnished to the Grantor and the FDEP Secretary, or designee, shall constitute a conclusively binding assent by the Grantor, barring the Grantor from asserting any claim or liability against the Trustee with respect to matters disclosed in the statement.

Section 12. Advice of Counsel. The Trustee may from time to time consult with counsel, who may be counsel to the Grantor, with respect to any question arising as to the construction of this Agreement or any action to be taken hereunder. The Trustee shall be fully protected, to the extent permitted by law, in acting upon the advice of counsel.

<u>Section 13.</u> <u>Trustee Compensation.</u> The Trustee is authorized to charge against the principal of the Trust its published Trust fee schedule in effect at the time services are rendered.

Section 14. Successor Trustee. The Trustee may resign or the Grantor may replace the Trustee, but such resignation or replacement shall not be effective until the Grantor has appointed a successor Trustee and this successor accepts the appointment. The successor trustee shall have the same powers and duties as those conferred upon the Trustee hereunder. Upon the successor trustee's acceptance of the appointment, the Trustee shall assign, transfer, and pay over to the successor trustee the funds and properties then constituting the Fund. If for any reason the Grantor cannot or does not act in the event of the resignation of the Trustee, the Trustee may apply to a court of competent jurisdiction for the appointment of a successor trustee or for instructions. The successor trustee shall specify the date on which it assumes administration of the trust in a writing sent to the Grantor, FDEP Secretary, or designee, and the present Trustee by certified mail 10 days before such change becomes effective. Any expenses incurred by the Trustee as a result of any of the acts contemplated by this Section shall be paid as provided in Section 10.

<u>Section 15.</u> <u>Instructions to the Trustee.</u>* All orders, requests, and instructions by the Grantor to the Trustee shall be in writing, signed by such persons as are designated in the attached <u>Exhibit A</u> or such other designees as the Grantor may designate by amendment to <u>Exhibit A</u>. The Trustee shall be fully protected in acting without inquiry in accordance with the Grantor's orders, requests, and instructions. All orders, requests, and instructions by the FDEP Secretary, or designee, to the Trustee shall be in writing, signed by the FDEP Secretary, or the designee, and the Trustee shall act and shall be fully protected in acting in accordance with such orders, requests, and instructions. The Trustee shall have the right to assume, in the absence of written notice to the contrary, that no event constituting a change or a termination of the authority of any person to act on behalf of the Grantor or the FDEP hereunder has occurred. The Trustee shall have no duty to act in the absence of such orders, requests, and instructions from the Grantor and/or the FDEP, except as provided for herein.

* Note: pursuant to Section 5, the authority to direct payments, reimbursements and refunds is given soley to the FDEP Secretary or designee.

Attachment 10 Revision 4 Page 189

<u>Section 16.</u> <u>Amendment of Agreement.</u> This Agreement may be amended by an instrument in writing executed by the Grantor, the Trustee, and the FDEP Secretary, or designee, or by the Trustee and the FDEP Secretary, or designee, if the Grantor ceases to exist.

<u>Section 17.</u> <u>Irrevocability and Termination</u>. Subject to the right of the parties to amend this Agreement as provided in Section 16, this Trust shall be irrevocable and shall continue until terminated at the written agreement of the Grantor, the Trustee, and the FDEP Secretary, or designee, or by the Trustee and the FDEP Secretary, or designee, if the Grantor ceases to exist. Upon termination of the Trust, all remaining trust property, less final trust administration expenses, shall be delivered to the Grantor.

<u>Section 18.</u> <u>immunity and Indemnification.</u> The Trustee shall not incur personal liability of any nature in connection with any act or omission, made in good faith, in the administration of this Trust, or in carrying out any directions by the Grantor or the FDEP Secretary, or designee, issued in accordance with this Agreement. The Trustee shall be indemnified and saved harmless by the Grantor or from the Trust Fund, or both, from and against any personal liability to which the Trustee may be subjected by reason of any act or conduct in its official capacity, including all expenses reasonably incurred in its defense in the event the Grantor fails to provide such defense.

Section 19. Choice of Law. This Agreement shall be administered, construed, and enforced according to the laws of the State of Florida.

<u>Section 20.</u> <u>Interpretation</u>. As used in this Agreement, words in the singular include the plural and words in the plural include the singular. The descriptive headings for each Section of this Agreement shall not affect the interpretation or the legal efficacy of this Agreement.

IN WITNESS WHEREOF the parties have caused this Agreement to be executed by their respective officersduly authorized and their corporate seals to be hereunto affixed and attested as of the date first above written.

The persons whose signatures appear below hereby certify that the wording of this Agreement is identical to the wording as adopted and incorporated by reference in Rule 62-701.630(6)(a), F.A.C.

GRANTOR Authorized Signature for Grantor Ed Kinley, President

Type Name and Title

813-390-0659

Telephone Number

EKinley@uestampa.com

TRUSTEE

Lynn A Skinner Vice Type Name and Title

813 301-150

Telephone Numbe

Lynn. Skinnerl E-mail Address

P Printed Name of Witness or Notary Se

Date

(See attached Certification of Acknowledgment, Schedule A and Exhibit A.)

Attachment 10 Revision 4 Page 190

CERTIFICATION OF ACKNOWLEDGMENT FOR SOLID WASTE FACILITY STANDBY TRUST FUND AGREEMENT

State of	Florida	County of	Hillsb	orough			
The foregoing	g instrument was ackn	owledged before me th	is		day of	March	, 20 <u>_15_</u> ,
by	Ed Kinley	as	F	President		of	
	Name of person			Title		_	
Universal Environmental Solutions, LLC			. the	e legal entity	/ described in	n and which ex	xecuted
Owner or Operator the above instrument. Owner or Operator Signature of Notary Public Personally Known Image: Signature of Notary Public					Notary Public -	MANELLI State of Florida free Jul 21, 2016 # EE 208062	
Type of Identification Produced							

SCHEDULE A

This Agreement demonstrates financial assurance for cost estimate(s) on file with FDEP for the following facility(ies). (If more than one facility is covered, indicate that a separate or additional Schedule A is attached.)

Include facility cost estimate at time of standby trust fund establishment. Schedule A cost estimate updates are only required during the use of a pay-in period. (If the facility cost estimate is greater than the initial fund payment, a pay-in period is probably being used.)

FDEP I.D. No.:	FLR 000 199 802	Facility Cost Estimate	
Facility Name:	Universal Environmental Solutions, LLC	(Total of Required Action amounts)	
Site Address:	1650 Hemlock St.	\$_233,172.50	
	Building #2		
	Tampa, FL 33605		

EXHIBIT A

All orders, requests, and instructions by the Grantor to the Trustee shall be in writing and signed by one of the following persons:

Ed Kinley, President

Type Name and Title

Joe Cimino, Vice-President

Type Name and Title

President or Vice President of Hendry Marine Industries, Inc., as Managing Member of Grantor Type Name and Title

Attachment 10 Revision 4 Page 191



FLORIDA DEPARTMENT OF Environmental Protection

Bob Martinez Center 2600 Blair Stone Road MS 4548 Tallahassee, Florida 32399-2400 Rick Scott Governor Carlos Lopez-Cantera Lt. Governor Noah Valenstein Secretary

August 20, 2018

Via email: ekinley@uestampa.com

Mr. Ed Kinley Universal Environmental Solutions, LLC (UES) P.O. Box 76105 Tampa, Florida 33675

Re: FLR 000 199 802 - Universal Environmental Solutions, LLC

Dear Mr. Kinley:

I reviewed the documentation submitted to demonstrate financial assurance for the above referenced facility and find it is in order. Hancock Whitney Bank issued letter of credit number SB75969F, effective July 17, 2017 on behalf of Universal Environmental Solutions, LLC. An amendment to this letter of credit was also issued, dated August 15, 2018. Together the aggregate amount totals \$241,666.18. This credit amount adequately covers the Department approved closing cost estimates of \$241,666.18, dated February 14, 2018. In addition, your standby trust fund agreement with Salem Trust Company remains in good standing. Therefore, the Universal Environmental Solutions, LLC used oil facility is in compliance at this time with the financial assurance requirements of Rule 62-701.630, Florida Administrative Code, which adopts 40 CFR Part 264, Subpart H, by reference.

Please contact me at (850) 245-8740 if you have any questions.,

Sincerely, St Elchedge

Susan Eldredge Government Operations Consultant II Solid Waste Financial Assurance

cc: Bheem Kothur, DEP/Used Oil Program Dawn Cinquino, DEP/Used Oil Program

https://floridadep.gov/waste/permitting-compliance-assistance

ATTACHMENT 11 - EMPLOYEE TRAINING PLAN

Revision 3 Attachment 11 Modifications No Revisions were required for this section, page number s, dates and revision numbers were updated. Revision 4 - Additional training documents have been added as page number 198 to 204.

11.1 UES Training Program - SPCC and General Health & Safety Training

A. <u>Program Intent</u>

- Federal (U.S. EPA) program for proper onsite management and handling of oil, prevention of spills, and proper spill response if spills occur. The U.S. EPA could inspect facility for compliance with the site SPCC Plan.
- Provide compliance with Oil Processing Permit requirements for the UES oil processing plant located at 1650 Hemlock Ave Tampa FL.
- "Oil" includes petroleum-based materials (gasoline, diesel fuel, kerosene, fuel oil, motor oil, hydraulic fluid, used oil, transformer oil, etc.), as well as vegetable oil, in a container having a capacity of 55 gallons or more.

B. <u>SPCC Plan</u>

Developed for implementation by site personnel. Facility copy must be maintained/updated by facility's SPCC Coordinator. Copy is available for review by all employees at any time.

C. <u>Training-Who, When, What</u>

- Who: <u>All facility employees involved in handling and management of any oil.</u>
- When: Minimum initial and annual refresher for all employees involved in oil handling.
 - Within two weeks of hire for new employees involved in oil handling.
 - If/when facility oil handling changes (so the SPCC Plan must be dated).

What: Initial: Entire SPCC Plan

Annual Update: Known spillevents or failures, malfunctioning components Ongoing: Facility changes, recently developed precautionary measures

D. <u>SPCC Coordinator</u>

Responsible for SPCC Plan implementation and oil spill prevention at the facility; See that person if ever any question or concern.

E. <u>General Facility Layout, Site Plan and Drainage Systems</u>

Ensure understanding of general facility operations, overall facility layout, drainage discharge locations, sensitive receiving water bodies, etc. Figure 1.3.1 summarizes the facility locations for PCW and oil handling.

F. Facility's Specific Oil Handling Inventory

Applies to containers with a capacity of 55 gallons or more, and transfers to/from them:

Stationary and mobile aboveground storage tanks (ASTs) Underground storage tanks (USTs) Drum and "tote" tank storage and handling

Also applies to: Gauges, alarms, and leak detection systems Piping systems Oil-filled electrical, operating, and manufacturing equipment Oil unloading/loading areas Additional oil storage or handling activities

G. <u>Containment and/or Diversionary Structures or Equipment to Prevent a Discharge</u>

Specific facility measures provided, as per the SPCC Plan Important because spilled oil will flow in accordance with drainage paths Intent of program is to keep oil out of water, out of stormwater and drainage Review operation and maintenance of all equipment intended to prevent discharges

H. Facility Drainage (Section 6.0 – Figure 3 Stormwater Drainage Plan)

Management of drainage from diked areas Drainage from undiked areas Potential impact on surface waters (including wetlands)

I. <u>Facility Transfer Operations. Pumping and In-plant Processes (Attachment 6.0 SPCC</u> <u>Plan Section VI and Figure 3 Stormwater Drainage Plan)</u>

Operation and maintenance measures to prevent discharges

J. <u>Truck Unloading/loading Areas</u>

Spills from inbound/outbound transfers, including direction of flow Unloading/loading must be visually monitored by facility personnel at all times Immediate response must be made to any spills, per the Plan's spill response procedures

K. Inspections and Tests (Attachment 6 - SPCC Plan Appendix B and E)

Comprehensive visual inspection monthly, with documentation prompt completion of required repairs, with documentation Periodic integrity testing of tanks

L. <u>Security</u>

General facility security measures, and localized Measures for individual oil handling areas. The facility limits are fences and entry can only be approved by the plant operator or facility owner. The UES pretreatment facility is located within a secure area that requires security gate clearance to enter.

M. Spill Response Procedures

Need to watch for, report, and clean up spills Spill response equipment, inventory, minimum amount to be always maintained, replenishment of use materials, etc. Review understanding of spill equipment, intent and how to use/deploy it; supplement with construction equipment if necessary, etc. Spill reporting requirements to Federal and State agencies

N. Additional State Requirements

Petroleum Bulk Storage Program Used oil requirements

O. <u>Miscellaneous</u>

Describe and review past discharges, reasons or causes, procedures to prevent recurrence, etc.

Describe and review any other equipment failures, malfunctioning components and any recently developed precautionary measures relative to oil handling and spill control

P. <u>General Rules</u>

Do not wait for problems or spills to occur. Keep eyes open, anticipate problems and take precautionary measures to prevent incidents. Report all identified or suspected concerns.

Q. Any Questions?

Facility: UES Bilge Oily Water Processing Facility, Tampa Florida 33619

1. SPCC Plan Personnel Training topics

Operation and maintenance of equipment to prevent discharges Discharge procedure protocols Applicable pollution control, laws, rules and regulations General facility operations Contents of the facility SPCC Plan

2. Discharge Prevention Briefings

Known discharges and failures Malfunctioning components Any recently developed precautionary measures

Training/Briefings Date:

ing/Briefings Presented By:	Attendees:			
Name	Signature	ID Numbe		

11.2 UES Training - 40 Hour HazWOper Training & DOT Training

UES requires all new hired employees to be OSHA 40 Hr HazWOper trained. All exisiting employees are HazWOper trained and are current with the required 8 Hr HazWOper Annual refresher training. Documentation of employee training records are kept in the UES office onsite and are available for review upon request.

11.2.1- OSHA 40 Hour HazWOper Training Topics and Objectives

OSHA 40 Hr and 8 Hr HazWOper training is conducted for all employees of UES. Training is conducted for all facility operator and transporters. UES contracts a local Tampa OSHA certified training contractor to conduct all employee training.

- Understand the purpose of OSHA and its role in regulating occupational safety
- Use Site Characterization to establish problems that may exist in your workplace and measures that can be implemented to eliminate hazards
- Identify hazardous materials existent in the workplace and the possible methods, symptoms and preventative measures of exposure
- Encourage the use of Material Safety Data sheets (MSDS) to identify and properly handle hazardous materials
- Familiarize yourself with materials, compounds and mixtures that may present flammable, explosive, chemical or radiological hazards
- Emphasize the importance of personal protective equipment in limiting hazardous exposure
- Establish an effective Site Control Program to limit the risk of exposure to only those working in the hazardous work zone
- Implement procedures for treating workers in the event of hazardous exposure
- Review of DOT regulations for transportation and hazardous materials handling.

11.2.1- 40 Hour HazWOper Training DOT Transportation Topics

The following DOT hazardous waste transportation topics are covered under the 40 Hr HazWOPer training conducted annually.

- DETERMINE WHETHER A MATERIAL MEETS THE DEFINITION OF A "HAZARDOUS MATERIAL"
- SHIPPING PAPER
- PLACARD AND MARK VEHICLE
- LOADING AND UNLOADING
- COMPATIBILITY
- BLOCKING AND BRACING
- INCIDENT REPORTING
- SECURITY PLAN

11.2 UES Training Records

Records of all employee training are retained at the UES main office located to the west of the facility. Administration and tracking of the employee training schedules are managed by Ed Kinley and an administrative assistance. Training schedules are updated monthly and scheduled using scheduling software. New hire employees are require to complete the OSHA 40 Hr HazWOper training prior commencement of any onsite activities at the facility.

Universal Environmental Solutions

Standard Operating Procedure for Hazardous Waste Assessments of Used Oils Prior to Pickup

What are halogens?

Halogens are any compound containing chlorine, bromine, fluorine and iodine. The following halogenated products are often mixed with used oil.

- Brake fluids
- Degreasers including petroleum distillates and mineral spirits
- Refrigerants (e.g., Freon)
- Paints
- Oil-based inks
- Antifreeze
- Carburetor cleaners

When is Used Oil considered a hazardous waste?

There are two primary approaches for determining whether a used oil is a hazardous waste.

• First Approach – Acceptable Knowledge (40 CFR 261.11 (c))

Process knowledge includes detailed information about the waste obtained from published or documented waste analysis data or studies conducted on wastes generated by processes similar to that which generated the waste in question.

• Second Approach – Testing (40 CFR 261.11 (c) and 40 CFR 761) Along with Acceptable Knowledge

Testing of the following four (4) hazardous waste characteristics are used to determine whether a used oil is a hazardous waste (Acceptable process knowledge can be substituted for one (1) or more the tests for the four (4) hazardous waste characteristics).

- o Corrosivity
- o Ignitability
- o Reactivity
- o **Toxicity**

1. Corrosivity - pH

An oil with a pH of less than or equal to 2 or greater than or equal to 12.5 are considered corrosive and hazardous and should not be picked up.

2. Ignitability – Flash Point Determination

An oil with a Flash Point below 140°F (60°C) are considered hazardous and should not be picked up. The Flash Point is the lowest temp at which vapors above a waste ignite when exposed to a flame.

3. Reactivity – Liquid Reacts Violently or Explodes

Other than the generator's knowledge, Oil is considered hazardous if any of the following characteristics are observed.

- Unstable and readily undergoes violent change without detonating
- Reacts violently or forms potentially explosive mixtures with water
- Releases toxic gases when mixed with water
- Is a cyanide or sulfide bearing waste that releases toxic gases when exposed to pH conditions between 2 and 12.5

4. Toxicity - Based on the Potential to Contaminate Groundwater

Oil is considered hazardous if it contains one (1) or more chemicals present out of a list of forty (40) chemicals at a concentration exceeding its Toxicity Characteristic Leaching Procedure (TCLP) concentration (see attached table). The purpose of the TCLP is to simulate the leaching that can occur in a landfill. Additionally, used oil is considered to be hazardous, if it contains more than 0.1 % or 1000 ppm (mg/L) of halogenated compounds or more than 50 ppm (50 mg/L) PCBs (40 CFR 761).

Why should we be concerned about the presence of halogenated compounds and PCBs in used oils?

Most used oil is recycled as fuel for industrial operations such as cement kilns and asphalt manufacturers. During the combustion process, some of the halogens (e.g., chlorine compounds) are chemically converted into hydrogen chloride. When combined with water, which also forms during the burning of fuels, hydrogen chloride becomes hydrochloric acid. Hydrochloric acid is a toxic compound that can corrode furnaces and threaten public health. Additionally, products created from the incomplete combustion of chlorine compounds, such as dioxins, pose significant health risks in the exhaust. Additionally, the more volatile halogen compounds have been shown to damage the ozone layer.

How do I determine whether I can pick up a load of used oil?

There are two (2) primary approaches to be used for determining whether the oil you plan on picking up is hazardous or not. The first approach is based on Your and/or Your Client's "Acceptable Knowledge" about the processes that generated the oils to be picked up. The second approach involves on-site assessments involving the use of your experience (i.e., chlorinated solvent-type odors), scanning of the tank headspace or a sample bottle headspace using your Cen-Tech Halogen Leak Detector model 92514 for Halogens and/or the use of Dexsil Kits to assess the existence of halogens at concentrations above 1000 ppm.

"Acceptable Knowledge"

You must first determine how the used oil was generated based on your experience, the operation that generated the used oil and the generator's knowledge and management of their operation. If you and the generator are sure that the process that generated the used oil did not involve any mixing with hazardous waste and/or the probability was very low that a hazardous mixture was generated based on the procedures used to store the used oil, you can be reasonably certain that the oil is not hazardous. However, if you have any doubts about the used oil based on the information provided by the generator, your experience or other knowledge you have, you should perform some field testing to confirm that the used oil is not hazardous based on the 1000 ppm halogen standard threshold.

Testing

Scan the used oil with the TIF XP – 1A Automatic Halogen Leak Detector that you carry with you in your used oil transport truck. The following procedure along with the "Assembly and Operating Instructions Manual" is to be used for scanning the used oil with you your detector.

- Switch the unit on by pressing the on / off key. The display will illuminate with the reset indication (left LED green, all others Orange) for 2 seconds. Verify the battery level by observing the constant power indicator.
- Upon turn on, the unit is set the sensitivity level to "5". A rapid, but steady beep rate will be heard. If desired the sensitivity can be adjusted by pressing the SENSITIVITY **a** or SENSITIVITY **b** key.
- Begin Halogen detection operation. If halogens are detected, then the audible tone will change to a siren type sound, distinctly different from the base beep rate. Additionally, the visual indicators will light progressively.
- Orient the probe tip within a distance of no more than ¼-inch from the surface of the liquid to be scanned.
- If the probe tip cannot be placed within a ¼-inch of the fluid surface, use a pipette or the like to collect a sample of the liquid to be scanned for halogens.
- Place the sample in a small plastic cup.

Attachment 11 Revision 4 Page 201

- If the detector indicates that halogens are present within a ¼-inch of the fluid being scanned, use the Dexsil "Clor-D-Tect 1000" kit to determine if the total halogen concentration in the used oil is less than or greater than 1000 ppm.
- If the Dexsil "Clor-D-Tect 1000" kit indicates that the concentration of halogens is greater than 1000 ppm, do not take the oil and contact Bryan Russel or Ed Kinley.

Assessment Supplies to be maintained on Every Truck for Field Testing

- One TIF XP 1A Automatic Halogen Leak Detector in working order with good batteries.
- Two (2) Dexsil "Clor-D-Tect 1000" kits that have not expired.
- Liquid Drum sampler or the like for drawing a sample to be placed in a glass jar.
- Two plastic cups for scanning samples of used oil, if the detector probe tip cannot easily be placed within ¼-inch of the used oil surface.

Required Paperwork

Record the pickup location and the rational ("Acceptable Knowledge") for not conducting hazardous waste field testing or the results of the conducted field tests prior to accepting the used oil for transport to the Universal Environmental Solutions Tampa facility.



99 Washington Street Melrose, MA 02176 Fax 781-665-0780 TestEquipmentDepot.com



TIF XP-1A Automatic Halogen Leak Detector

THIS MODEL IS: **DESIGN CERTIFIED BY** MET LABORATORIES, INC. TO MEET SAE J1627 FOR R134a, R12 AND R22.

> CLASS 1 DIVISION 2 GROUPS C & D HAZARDOUS LOCATIONS HAND HELD GAS DETECTOR CLASSIFIED BY UNDERWRITERS LAPORATOPIES CULUE VINDERWRITERS USAL LABORATORIES, INC.® AS TO FIRE ELECTRICAL SHOCK AND EXPLOSION HAZARDS ONLY. READ OWNERS MANUAL BE-FORE OPERATING. CAUTION: TO REDUCE THE RISK OF ELECTRIC SHOCK DE-ENER-GIZE UNIT BEFORE REPLAC-ING SENSING TIP OR SERVIC-ING SENSING TIP OR SERVIC-ING UNIT, USE ONLY WITH 1.5V ALKALINE BATTERIES, SIZE C.

(6

General Info Features..... Parts & Cont Getting Start Installing Operating Fe Battery Ir Automatio Sensitivity Alarm Ind Operating Inst Operating Ti Applications Maintenance Replacemen Specification Warranty

Attachment 11 Revision 4 Page 202

1

TABLE OF CONTENTS

ormation	2
	2
trols	3
ted	4
Batteries	4
eatures	4
ndicator	4
c Reset	5
y Adjustment	5
dications	6
structions	7
ps	7
	9
9	9
nt Parts	10
าร	11
	11

GENERAL INFORMATION

The TIF XP-1A is the culmination of over 30 years of Leak Detector manufacturing experience. TIF is proud to present this tool as the most stable and sensitive negative corona leak detector ever made. We have incorporated all of our experience, and years of customer feedback into this product, in the hope of providing our valued customers with the best of everything; price, performance and reliability.

An advanced microprocessor is the heart of this unit. Its Digital Signal Processing permits better management of the circuitry and sensing tip signal than ever before possible. Additionally, the number of components used in the circuit is reduced nearly 40%, increasing reliability and performance. The microprocessor monitors the sensing tip and battery voltage levels 4000 times per second, compensating for even the most minor fluctuations in signal. This translates into a stable and dependable tool in almost any environment.

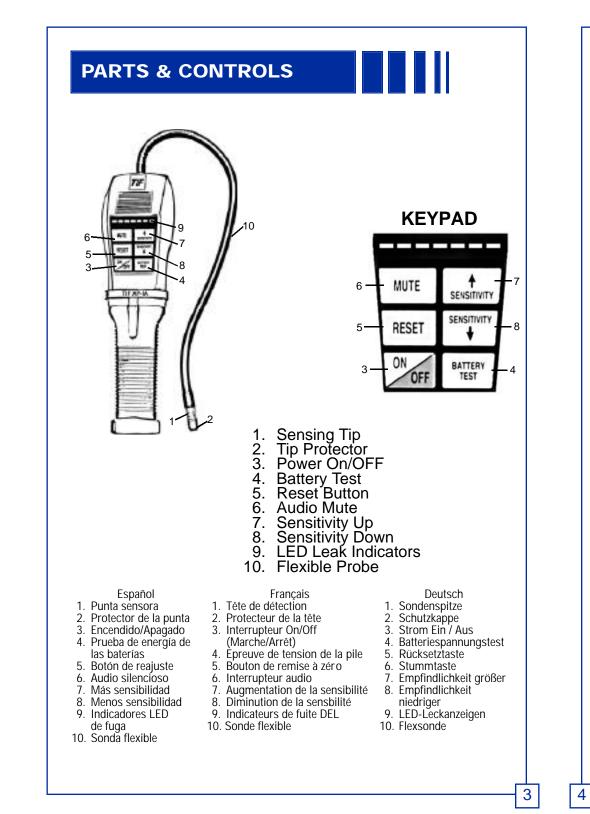
Convenience features have been added to enhance the usability of the XP-1A. Seven levels of sensitivity provide an increase of 64 times from level 1 to level 7. Unique Tri-Color LED's show a progressive and wide ranging leak size indication, communicate the sensitivity level, and provide a true voltage indication of battery power level. A tactile keypad controls all functions of operation. A revolutionary new case design gives the user grip and control, and places the visual indicators in direct sight during use.

Please take a few moments to read through the following pages, in order to understand and benefit from all the capabilities of your new XP-1A. We trust that you will be 100% satisfied with your new purchase. If you have any questions or comments after reviewing the manual, please feel free to contact us in the USA, toll free at 1 800 327 5060 from 8AM to 5PM EST.



- Microprocessor control, with Advanced Digital Signal Processing
- Tricolor visual display
- Seven (7) levels of sensitivity provide an increase of up to 64x
- Tactile Keypad controls
- Real time sensitivity adjustment
- Battery Test function
- Battery voltage indication
- Certified to SAE J1627 for R134a, R12, R22
- Detects ALL Halogenated Refrigerants
- True mechanical pumping provides positive airflow through sensing tip
- Mute feature included
- · Cordless and Portable, operates on 2 "C"-cell batteries
- Carrying case included
- 14" (35.5cm) flexible, stainless probe
- Optional Carrying Holster
- Optional Reference Leak Source
- Three Year Warranty

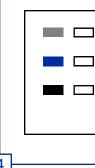
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Installing Batteries

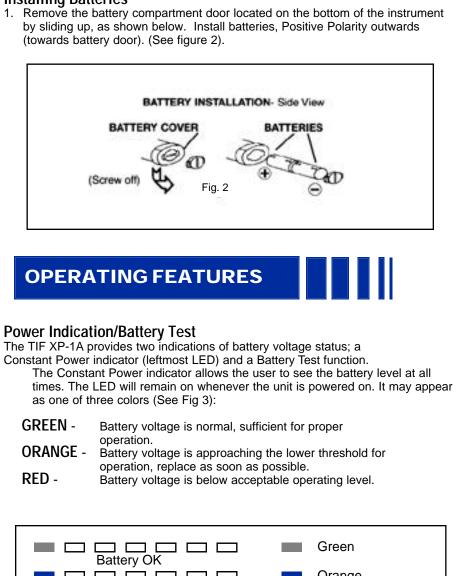
GREEN -ORANGE -

RED -



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Attachment 11 **Revision 4** Page 203

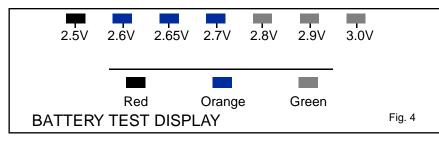


Battery OK			
	0	range	
Battery Low			
	R	ed	
Replace Battery			
CONSTANT POWER IND	ICATOR	Fig. 3	

OPERATING FEATURES

Battery Test Function. This feature is activated by pressing the Battery Test key. When pressed, the LED's will display a three color bargraph indication of true battery voltage (See Fig. 4). The LED's correspond to voltage as shown in the figure.

Not all LEDs will always be on; the number of LEDs on, indicate the voltage level.



The battery voltage display will remain as long as the BATTERY TEST key is depressed. Release the BATTERY TEST key to return to normal operation. This function may be activated at any time during operation, and does not interrupt alarm signals.

Automatic Circuit/Reset Feature

The TIF XP-1A features an Automatic circuit and a Reset function key that set the unit to ignore ambient concentrations of refrigerant.

- · AUTOMATIC CIRCUIT Upon initial power on, the unit automatically sets itself to ignore the level of refrigerant present at the tip. Only a level, or concentration, greater than this will cause an alarm. CAUTION: Be aware that this feature will cause the unit to ignore any refrigerant present at turn on. In other words, with the unit off, if you place the tip up to a known leak and switch the unit on, no leak will be indicated!
- RESET FEATURE Pressing the RESET key during operation performs a similar function. When the RESET key is pressed it programs the circuit to ignore the level of refrigerant present at the tip. This allows the user to 'home-in' on the source of the leak (higher concentration). Similarly, the unit can be moved to fresh air and reset for maximum sensitivity. Resetting the unit with no refrigerant present (fresh air) causes any level above zero to be detected. Whenever the unit is reset, the LED's (except the leftmost power indicator) will turn Orange for 1 second. This provides a visual confirmation of the reset action.

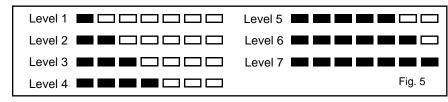
Sensitivity Adjustment

The TIF XP-1A provides seven levels of sensitivity. The sensitivity level is indicated on the visual display when either the SENSITIVITY **a** OR SENSITIVITY **b** keys are pressed. The base beeping tone is also an indication of sensitivity level.

OPERATING FEATURES

When the unit is switched on, it is set to sensitivity level 5.

- 1. To adjust the sensitivity, press the SENSITIVITY **a** or SENSITIVITY **b** key. When the key is pressed, the visual display will show the LED's red. The number of LED's lit, indicates the level (See Fig 5). Level one (lowest sensitivity) is shown by the leftmost LED. Counting from left, levels 2 through 7 are indicated by the corresponding number of red LED's; i.e. level 7 is shown by all LED's lit.
- 2. Pressing the SENSITIVITY **a** or SENSITIVITY **b** key will change the sensitivity. The keys can be pressed intermittently to change levels one at a time, or held down to move quickly through the levels.
- 3. Each time the level is increased (or decreased) the relative sensitivity is doubled (or halved). In other words, level 2 is twice as sensitive as level 1, level 3, 4 times as sensitive, etc... This allows sensitivity to be increased as much as 64 times!

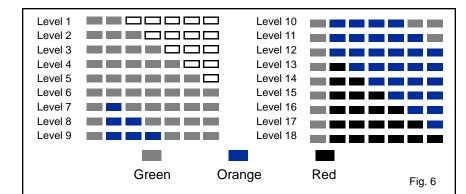


Alarm Indications

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The XP-1A features 18 alarm levels. This permits a clear indication of relative leak size and strength. The progressive indicators can be used to home-in on a leak; as the increasing alarm levels indicate that the source (highest concentration) is being approached. Each level is indicated by additional LED's in one of three colors, Green, Orange or Red (See Fig 6).



At first the display will light Green, from left to right. Then, the LED's will light Orange, from left to right, replacing the Green one at a time. Finally, the LED's will light Red, from left to right, replacing the Orange, one at a time.

OPERATION:

- 2.
- 4
- 5.
- 6.

- 2. 3
- 4. checking.

SAE J1628 Recommended Procedure

operation.

OPERATING INSTRUCTIONS

1. Switch the unit on by pressing the ON/OFF key. The display will illuminate with the reset indication (Left LED green, all others Orange) for 2 seconds.

Verify the battery level by observing the constant power indicator (see above). Upon turn on, the unit is set to sensitivity level 5. A rapid, but steady beep rate will be heard. If desired, the sensitivity can be adjusted by pressing the SENSI-TIVITY **a** or SENSITIVITY **b** key, as described above.

Begin searching for leaks. When refrigerant is detected, the audible tone will change to a 'siren' type sound, distinctly different from the base beep rate. Additionally, the visual indicators will light progressively as described in the Alarm Indications section.

Sensitivity can be adjusted at any time during operation by using the SENSITIV-ITY **a** or SENSITIVITY **b** key. This adjustment will not interrupt detection. If a full alarm occurs before the leak is pinpointed, press the RESET key to reset the circuit to a zero reference as described above.



The following section includes several general operating tips, and the SAE J1628 recommended procedure for leak detection.

Adjust the sensitivity up, only when a leak cannot be found. Adjust the sensitivity down only when resetting the unit does not allow you to 'home in' on the leak. In areas that are heavily contaminated with gas, the unit may be reset to block out ambient concentrations of gas. The probe should not be moved while the unit is being reset. The unit can be reset as many times as needed. In windy areas, even a large leak can be difficult of find. Under these conditions, it is best to shield the potential leak area.

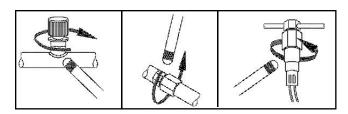
Be aware that the detector may alarm if the sensing tip comes in contact with moisture and/or solvents. Therefore, avoid contact with these when leak

NOTE: On Automotive A/C Systems leak test with the engine not in

1. The air conditioning or refrigeration system should be charged with sufficient refrigerant to have a gauge pressure of at least 340 kPa (50 psi) when not in operation. At temperatures below 15° C (59° F), leaks may not be measurable, since this pressure may not be reached.

OPERATING TIPS

- 2. Take care not to contaminate the detector probe tip if the part being tested is contaminated. If the part is particularly dirty, or condensate (moisture) is present, it should be wiped off with a dry shop towel or blown off with shop air. No cleaners or solvents should be used, since the detector may be sensitive to their ingredients.
- 3. Visually trace the entire refrigerant system, and look for signs of air conditioning lubricant leakage, damage, and corrosion on all lines, hoses, and components. Each questionable area should be carefully checked with the detector probe, as well as all fittings, hose to line couplings, refrigerant controls, service ports with caps in place, brazed or welded areas, and areas around attachment points and hold-downs on lines and components.
- 4. Always follow the refrigerant system around in a continuous path so that no areas of potential leaks are missed. If a leak is found, always continue to test the remainder of the system.
- 5. At each area checked, the probe should be moved around the location, at a rate no more than 25 to 50 mm/second (1-2 in/second), and no more than 5 mm (1/4 in) from the surface, completely around the position. Slower and closer movement of the probe greatly improves the likelihood of finding a leak (see fig. 7). Any increase in beep rate is indicative of a leak.



6. An apparent leak shall be verified at least once as follows: a) Blow shop air into the area of the suspected leak, if necessary, and repeat the check of the area. In cases of very large leaks, blowing out the area with shop air often helps locate the exact position of the leak.

b) First move the probe to fresh air and reset. Then hold the probe tip a close as possible to the indicated leak source and slowly move around it until the leak is confirmed.

Automotive A/C Systems only -

8

7. Leak testing of the evaporator core while in the air conditioning module shall be accomplished by turning the air conditioning blower on high for a period of 15 seconds minimum, shutting it off, then waiting for the refrigerant to accumulate in the case for 10 minutes.

After such time, insert the leak detector probe into the blower resistor block or condensate drain hole, if no water is present, or into the closest opening in the heating/ventilation/air conditioning case to the evaporator, such as the heater duct or a vent duct. If the detector alarms, a leak apparently has been found.

OPERATING TIPS

All Systems -

8.Following any service to the refrigerant system and any other service which disturbs the refrigerant system, a leak test of the repair and of the service ports of the refrigerant system should be done.

APPLICATIONS

The XP-1A Leak Detector may also be used to:

- Detect leaks in other systems and storage/recovery containers. It will respond to ALL halogenated (contains Chlorine or Fluorine) refrigerants. This includes, but is not limited to:
 - CFCs e.g. R12,R11,R500,R503 etc...
 - HCFCs e.g. R22,R123,R124,R502 etc...
 - e.g. R134a, R404a, R125 etc... HFCs
 - Blends such as AZ-50, HP62, MP39 etc...
- Detect Ethylene Oxide gas leaks in hospital sterilizing equipment (it will detect the halogenated carrier gas)
- Detect SF-6 in high voltage circuit breakers
- Detect most gases that contain Chlorine, Fluorine and Bromine (halogen gases)
- Detect cleaning agents used in dry cleaning applications such as
- perchloroethylene
- Detect Halon gases in fire extinguishing systems

MAINTENANCE

Proper maintenance of your Leak Detector is very important. Carefully following the instructions, outlined below, will reduce performance problems and increase the life expectancy of the unit.

WARNING: TURN UNIT OFF BEFORE REPLACING THE SENSING TIP. FAILURE TO DO SO MAY RESULT IN A MILD ELECTRICAL SHOCK!

Keep the sensing tip clean: Prevent dust, moisture and grease build-up by utilizing the provided tip protector. Never use the unit without the protector in place.

Before using the unit always inspect the tip and protector to see that they are free of dirt and/or grease. To clean:

- 1. Remove protector by grasping and pulling off tip.
- 2. Clean protector with shop towel and/or compressed air.

to clean.

NOTE: Never use solvents such as gasoline, turpentine, mineral spirits, etc... as these will leave a detectable residue and desensitize your unit.

environment.

To replace the tip:

Standard Equipment

Your Halogen Leak Detector comes equipped with one Carrying Case, one Owner's Manual, 2 "C" cell batteries and one replacement Sensing Tip and Protector.

Replacement Parts :

TIFXP-2 TIF5201

9

10

MAINTENANCE

3. If the tip itself is dirty it can be cleaned by immersing in a mild solvent, such as alcohol, for a few seconds, and then using compressed air and/or a shop towel

Sensing tip replacement: The tip will eventually wear out and require replacement. It is difficult to predict exactly when this will occur since tip longevity is directly related to the conditions and frequency of use. The tip should be replaced whenever the alarm sounds or becomes erratic, in a clean, pure, air

1. Make sure the unit is OFF.

2. Remove the old tip by unscrewing counter-clockwise.

3. Use the supplied replacement tip, located in the carrying case. Replace by screwing on clockwise.

REPLACEMENT PARTS

To purchase replacement parts for your leak detector please contact your local distributor. To ensure that you obtain the correct parts it is best to reference the part number when placing your order.

- Maintenance Kit (3 Sensing Tips & 3 Tlp Protectors)
- TIFXP-4A Blow Molded Carrying Case
 - Leak Source

Attachment 11 Revision 4 Page 206

SPECIFICATIONS			
Power Supply:	3V DC; two "C" cell Alkaline batteries		
Maximum Sensitivity	: Per SAE J1627 Rating Criteria; Certified for R12, R22 and R134a @ 0.5 oz/yr. (14gr/yr)		
Ultimate sensitivity:	less than 0.1 oz/yr (3 gr/yr) for all Halogen based refrigerants.		
Sensing Tip Life:	Approx. 20 hours		
Operating			
Temperature:	30° to 125° F (0°to 52° C)		
Battery Life:	Approximately 30 hours normal use		
Duty Cycle:	Continuous, no limitation		
Response Time:	Instantaneous		
Reset Time:	One second		
Warm-Up Time:	Approximately 2 Seconds		
Unit Weight:	1.2 lbs (560 grams)		
Unit Dimensions:	9" x 2.5" x 2.5" (22.9 cm x 6.5cm x 6.5cm)		
Fived Probe Length	1/1" (35.5 cm)		

Fixed Probe Length: 14" (35.5 cm)

WARRANTY

This instrument has

been designed and manufactured to provide unlimited service. Should the unit be inoperative, after performing the recommended maintenance, a no-charge repair or replacement will be made to the original purchaser if the claim is made within three years from the date of purchase. This warranty applies to all repairable instruments that have not been tampered with or damaged through improper use. This warranty does not cover batteries, sensing tips, tip protectors, or any other materials that wear out during normal operation of the instrument.

Before returning your instrument for repair please make sure that you have carefully reviewed the Unit Maintenance section of this manual to determine if the problem can be easily fixed. Make sure that you have either replaced or cleaned the sensing tip and tip protector and that the batteries are working properly BEFORE returning the unit. If the instrument still fails to work properly send the unit to the repair facility address on the back cover of this manual. Repaired or replaced tools will carry an additional 90 day warranty. For more information please call (800) 327-5060.

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