359 Cypress Road ♦ Ocala, FL 34472 ♦ (800) 328-8252
(352) 687-0688 ♦ Website: www.usedoil.com ♦ Fax: (352) 687-8511

Atlantic
Fuel Services, Inc.

RECEIVED
JAN 23 2003
Central Dist. - DEP

January 20, 2003

Ms. Vivian F. Garfein
Director of District Management
Florida Department of Environmental Protection
3319 Maguire Boulevard, Suite 232
Orlando, FL 32803-3767

Subject: FDEP letter on Used Oil Management dated November 7, 2002.

Dear Ms. Garfein,

The following response is provided for the subject letter for the section 12 items pursuant to our meeting with Department personnel on December 20, 2002.

12 (a) 40 CFR 279.52 (a)(1) The pump for loading rail tankers has been moved and was reinstalled so that the connections and pump housing are with in secondary containment. The prior pump location will be properly assessed and closed. The contaminated soil has been removed and will be transported and properly treated or disposed of at a permitted landfill. A detailed soil sampling plan that includes sampling procedures and corrective actions is provided as enclosure (1). Pictures of the work completed are provided as enclosure (2).

12 (b) 40 CFR 279.22 (c) The unlabeled container of used oil was result of the action of one individual that did not follow existing Atlantic Industrial Services, Inc. management procedures and employee training. It is possible that the bucket was placed there by a contractor working at the facility. Contractors are briefed on proper used oil container marking at the beginning of jobs. The entire facility is inspected on a weekly basis to ensure that used oil containers are marked with the words "used oil". The containers provided to the Atlantic Industrial Services, Inc. employees are marked with the words "used oil". The Atlantic Industrial Services, Inc. employees have been given additional training on the marking of used oil containers. The training sign in sheet is provided as enclosure (3). Atlantic Industrial Services, Inc. will ensure that containers accumulating used oil are labeled accordingly in the future.

12 (c) 40 CFR 279.44(a) Atlantic Industrial Services, Inc. used knowledge of the used oil in accordance with 40 CFR 279.44(b) for the loads in question. These particular loads of used oil were from known sources that have provided the enclosure (4) documentation as to the halogen content of the used oil loads in question. The regulations state that the determination of whether or not the used oil contains greater that 1000 ppm total

Halogens shall be made by either testing the oil or by applying knowledge of the halogen content of the used oil in light of the materials or processes used.

Atlantic Industrial Services, Inc. has prepared the enclosure (5) written Standard Operating Procedure (SOP) for Used Oil Waste Analysis and has conducted training with the appropriate employees. The training sign in sheet is provided as enclosure (3).

12 (d) 40 CFR 279.54(b) The existing tanks, piping and secondary containment are inspected in accordance with the Used Oil Permit and the facility Spill Prevention, Control and Countermeasures (SPCC) Plan. The inspections have not identified any leaks in the tanks, piping or secondary containment. The night prior to the inspection it rained at the facility. The rainwater was in the secondary containment less than 24 hours at the time of the inspection. The rainwater and residual oil was removed in accordance with the facility Used Oil Permit and SPCC Plan. The existing facility inspections are provided as enclosure (6). Atlantic Industrial Services, Inc. will minimize releases of used oil to the secondary containment.

Please do not hesitate to call me at (352) 687-0688 should you have any questions or should additional information be needed. As always it is a pleasure to work with you.

Sincerely,

Brian S. (Jack) McCully
General Manager - Florida Operations
<AIS-FDEP-17 >

cc: Tim Rudolph, ENVIRONEERING, Inc.
John R. Feagle, Atlantic Industrial Services, Inc.
Michael G. Ryan, President, Atlantic Industrial Services, Inc.

ENCLOSUE 1 - Atlantic Industrial Services, Inc.
Soil Sampling Plan

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Central Dist. - DEP

ATLANTIC INDUSTRIAL SERVICES, INC.

359 Cypress Road Silver Springs Shores
Ocala, Florida 34472

INTERIM REMEDIAL ACTION
AND
SAMPLING PLAN

Facility Location:

359 Cypress Road
Ocala, Florida 34472

RECEIVED
JAN 23 2003
Central Dist. - DEP

REVISION: 1

<AIS-SAMPLING-PLAN-USED OIL SPILL-TP-1>

Prepared By: Signature: Date:

T. W. Rudolph
Environmental Engineer
ENVIRONEERING, Inc.

1/20/03

Reviewed By: Signature: Date:

B.S. McCully
GM Florida Operations
Atlantic Industrial Services, Incorporated

1/20/03

Approved By: Signature: Date:

J.R. Feagle
Vice-President
Atlantic Industrial Services, Incorporated

1/20/03

Table of Contents

1.0 INTRODUCTION

The purpose of this Interim Remedial Action and Sampling Plan (IRASP) is to address one specific area noted on the enclosure (1) facility diagram for Atlantic Industrial Service, Inc. (AIS) pursuant to a FDEP field inspection on September 25, 2002. The Florida Department of Environmental Protection (FDEP) Inspection letter dated November 7, 2002 transmitted the inspection report. The FDEP letter number for the inspection transmittal was OWL-HW-C-E-02-032.

This IRASP outlines the action plan for contaminate remediation and confirmation of source removal. The specific site is the area around the rail tanker transfer pump as presented in the enclosure (1) drawing. Most of the corrective action has already been completed and will be documented in this plan.

2.0 INTERIM REMEDIAL ACTION AND SAMPLING PLAN

The Interim Remedial Action and Sampling Plan (IRAP) is composed of several phases for the area of concern. Each phase may or may not need to be completed based on the results of the previous phase. The area covered by this IRAP are the: 1) Rail Tanker Transfer Pump. The enclosure (1) site plan is provided and it shows the approximate general area of concern.

The IRASP can be divided up into five basic phases for the area of concern. Each phase will discussed in the subsections of this part. The first phase is contamination removal. The second phase is confirmatory sampling. Phase one work will be repeated with additional phase two confirmation sampling and analysis should the first round of confirmation samples show that regulated soil still needs to be excavated. The third phase is back filling the excavated areas. The fourth phase is waste classification. The fifth phase is the last step of waste disposal. The successful completion of each phase on the area of concern, as required, will bring this project to completion.

The written nonhazardous waste determinations for the excavated soil will be completed after the waste stream has been analyzed for TCLP RCRA metals and TCLP Volatile Organics.

Prepared by:
ENVIRONBRING, INC.
109 Azalea point Drive South
Ponte Vedra beach, FL 32082

2.1 Rail Tanker Transfer Pump Area

This area will require soil excavation, confirmation sampling and analyses, backfilling, waste stream classification and disposal of the contaminated soil. This area had used oil stained soil at the time of the inspection.

The proposed IRASP for this area is to excavate and stage the contaminated soil on site pending waste classification and disposal. The boundary of the excavation is proposed at 50 ppm on the OVA or to the extent of visual soil staining or until the surface of groundwater is reached. A qualitative ultraviolet light meter may also be used to help verify the extent of used oil contamination in the field. The soil will be staged by placing it into a roll off dumpster, dump trailer, solid waste facility or drums at a different location at the facility. Soil borings will be completed in this area and the soil will be field screened using an OVA-FID at one-foot intervals. The excavation will have five confirmation samples obtained and analyzed for Total Petroleum Hydrocarbons (FL-PRO). The soil sample with the highest Total Petroleum Hydrocarbons (FL-PRO) result that is below the regulatory level in F.A.C. 62-777 will be analyzed by EPA Method 8260, EPA Method 8270 and TCLP RCRA Metals to verify sufficient contaminated soil has been removed. The five soil samples to be analyzed for Total Petroleum Hydrocarbons (FL-PRO) are to be obtained from the bottom of the excavation and the north, south, east, and west sides of the excavation. The soil sampling locations will be marked with survey flags. Additional soil will be excavated and additional confirmation sampling will be completed if the first round of confirmation sampling indicates that regulated soil is still present in the excavation.

Visually contaminated groundwater will be sampled if present at the lower boundary of the excavation. The presence of a sheen will be the visual criteria for deciding if the groundwater is contaminated. The groundwater will be analyzed by EPA Methods 624, EPA Method 625, FL-PRO, Arsenic, Cadmium, Chromium and Lead, if present.

The excavated soil will be sampled and analyzed to make a hazardous waste determination. The contaminated soil will be disposed of properly as a nonhazardous waste. The soil may be grouped with other nonhazardous soil removed from the site

for incineration or disposal. A composite sample for the preburn parameters will be run on the combined soils if the thermal treatment option for nonhazardous disposal is selected. The excavation will be filled with clean soil after the confirmation soil samples are verified to meet the residential clean soil guidance criteria in F.A.C. 62-777. The excavated area will be left open until the clearance analytical has been submitted to FDEP and concurrence has been given to backfill the excavation with clean fill or lime rock.

3.0 CONCLUSIONS AND RECOMMENDATIONS

This Interim Remedial Action and Sampling Plan has been prepared based upon information from several sources and should be followed with out modification. The information sources used include the FDEP inspection report and information obtained from the facility personnel during several site visits and telephone conversations.

Soil sampling will be obtained at the excavation surface to verify that sufficient contamination has been removed leaving clean soil. The groundwater, if present, in the excavation pit will be sampled to verify sufficient remediation has occurred only if a sheen is present on the surface of the groundwater. Groundwater will not be sampled unless it is reached in the excavation. The sampling will be conducted using sampling personnel with a Comprehensive Quality Assurance Project Plan (COMPQAPP). The OVA work will also be done using an independent third party with a COMPQAPP. Environeering, Inc. has the approved CompQAP No. 980119 and has adopted the Standard operating procedures of the Quality Assurance Section in Tallahassee. Field equipment will be selected from the SOP's list. The analytical will be completed Advanced Environmental Laboratories, Incorporated. The analytical will be analyzed by Advanced Environmental Laboratories, Incorporated under COMPQUAP Number 940242. This remedial action work should leave the areas of concern environmentally clean if executed properly and prior groundwater contamination does not exist.

The manifests or landfill dump tickets will be provided for the petroleum-contaminated soil removed from the site.

The excavation work has already been initiated by Atlantic Industrial Services, Incorporated. The confirmation sampling and assessment work will be initiated once the source removal work has been finished and the IRASP has been approved by FDEP.

Pictures documenting the cleanup work completed to date and the modifications of the rail tanker pump are provided as enclosure (2).

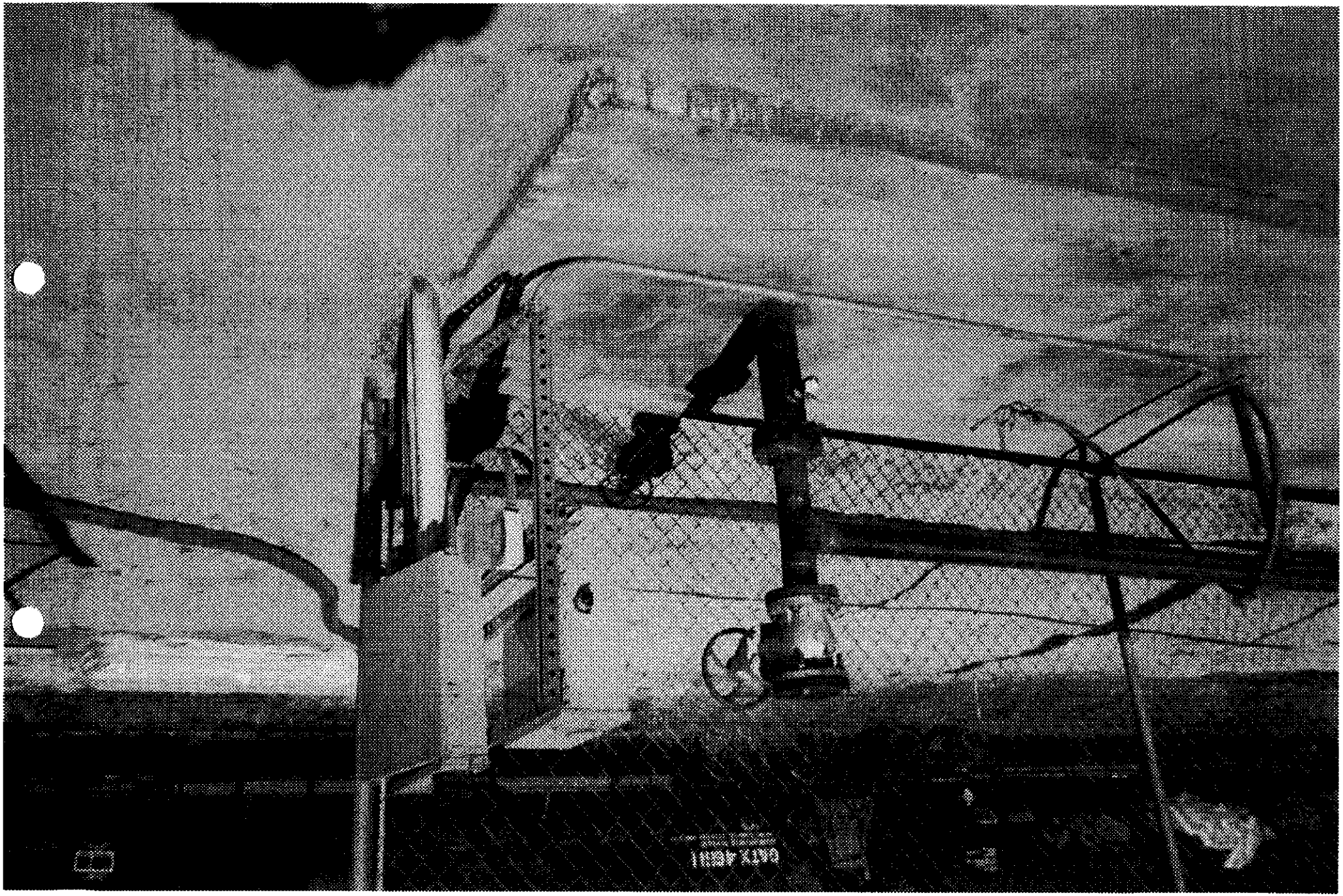
Timothy W. Rudolph

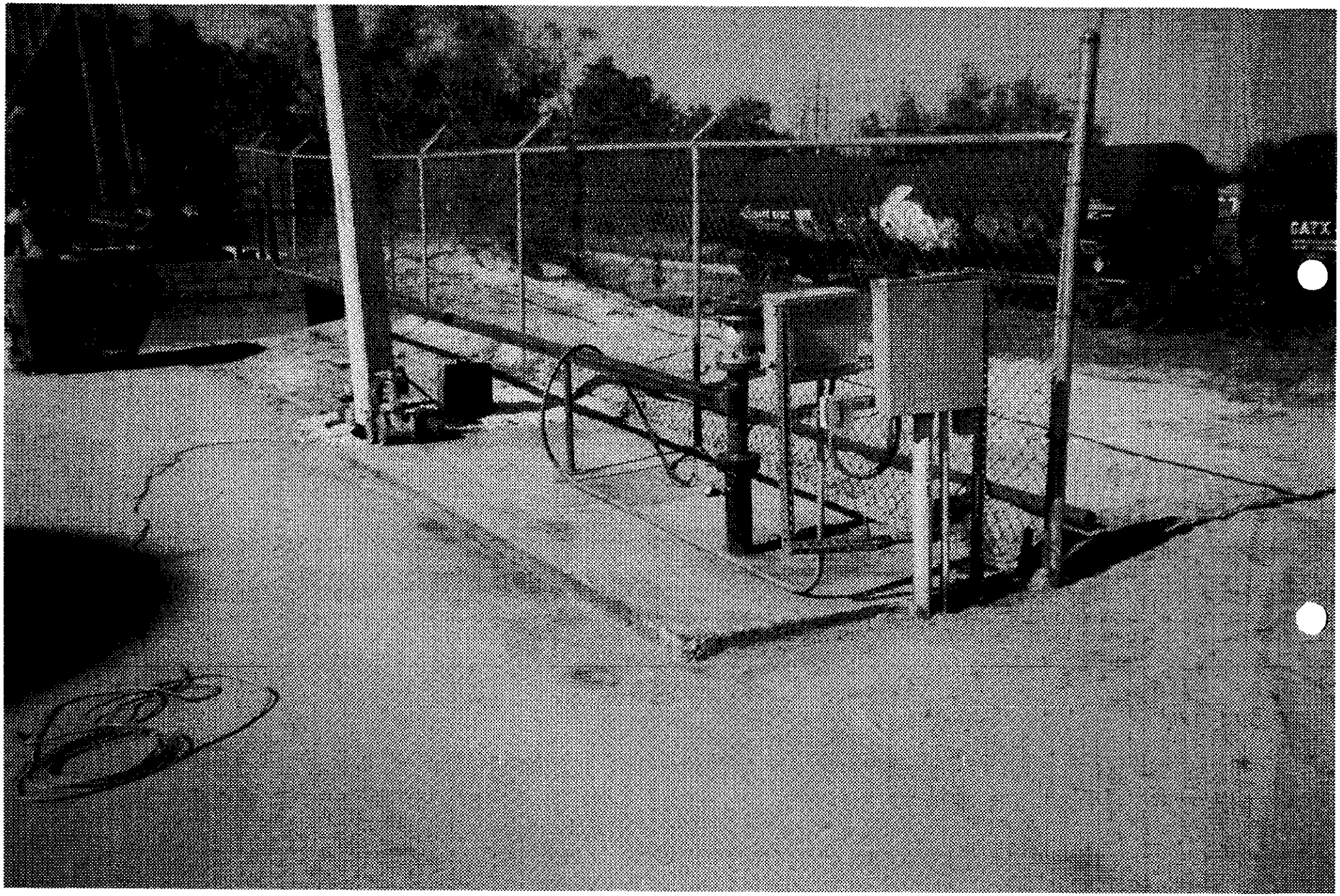
Timothy W. Rudolph P.E.
ENVIRONMENTAL ENGINEER

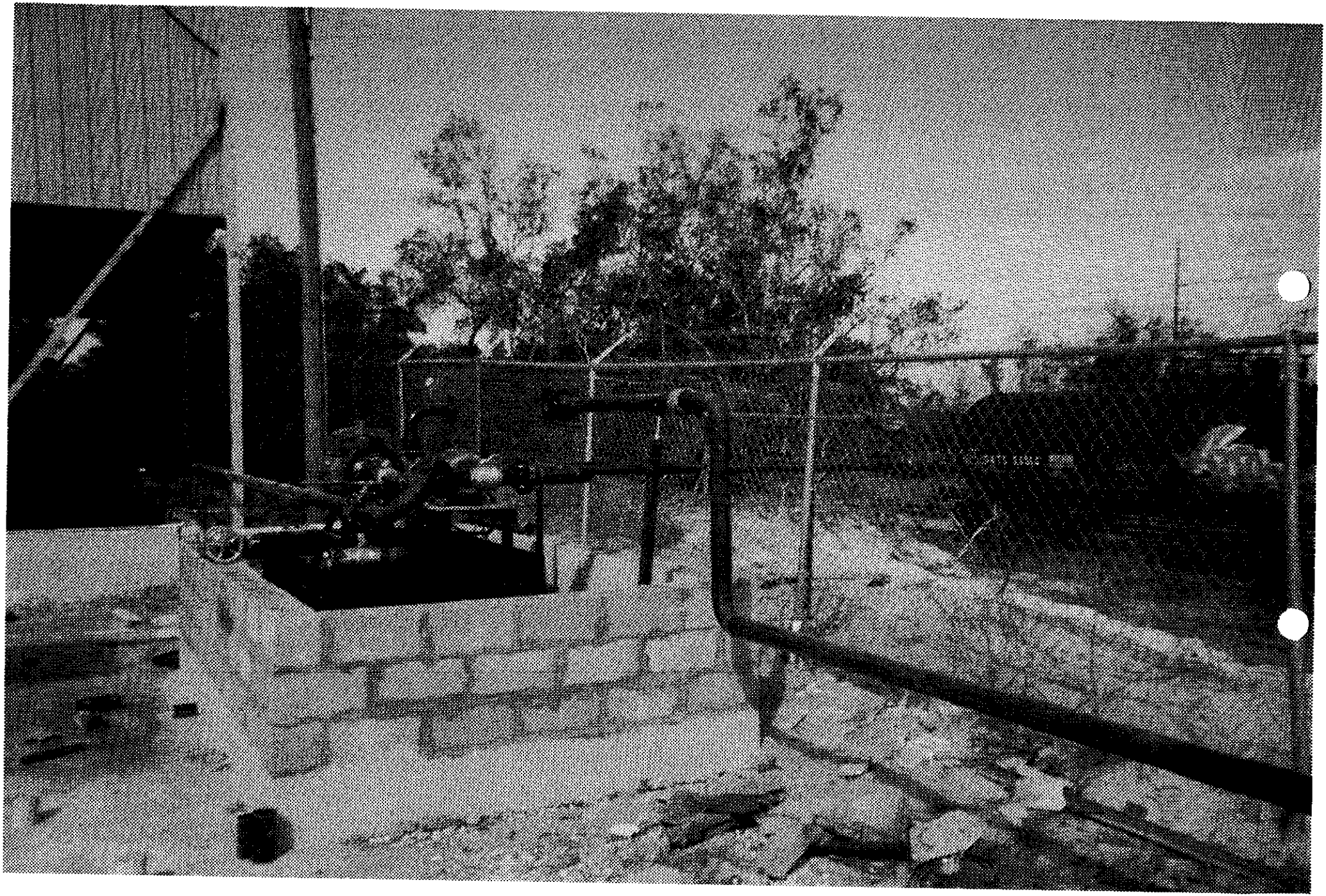
DATE 1/20/03

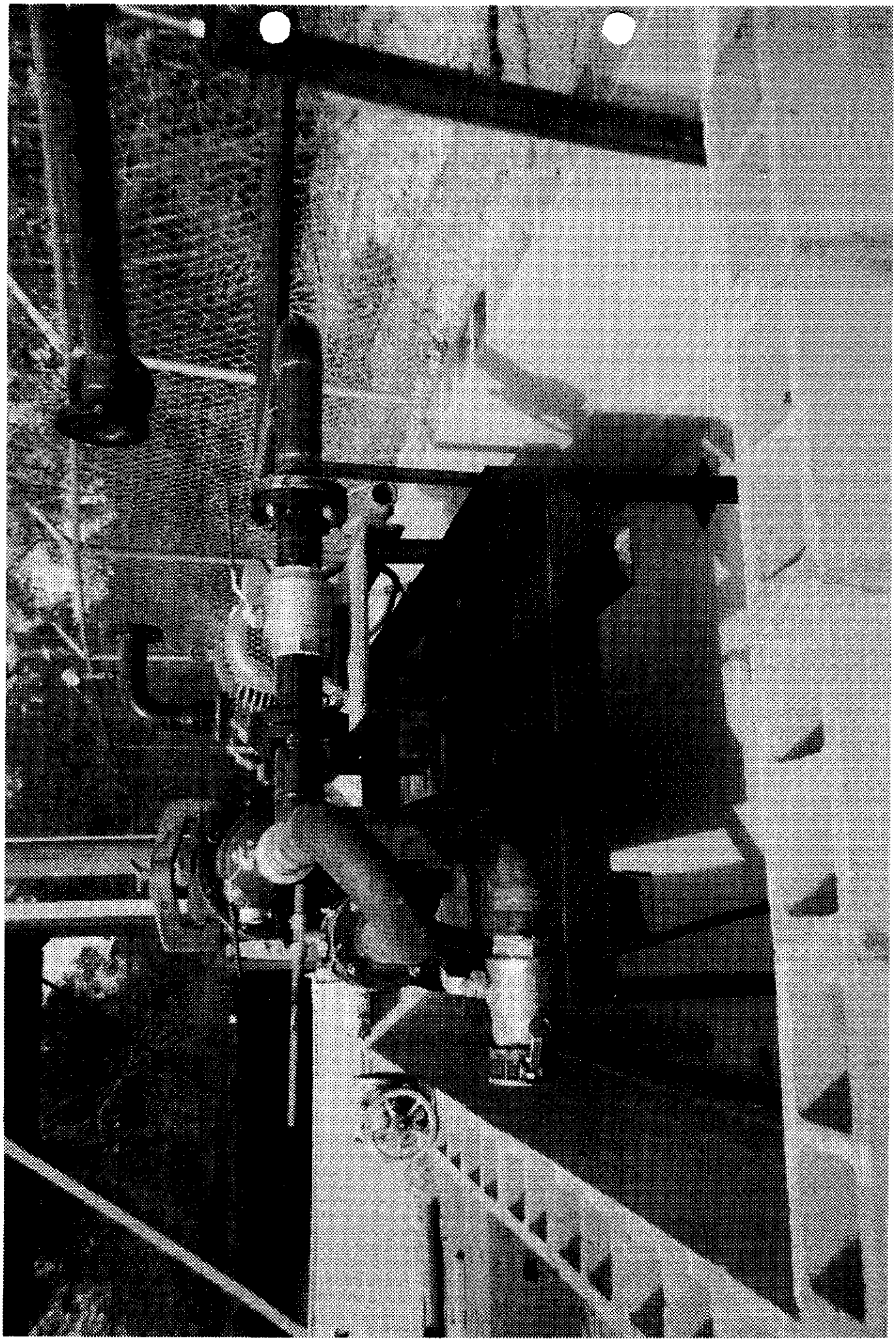
<AIS-SAMPLING-PLAN USED OIL SPILL-BODY-1.DOC>

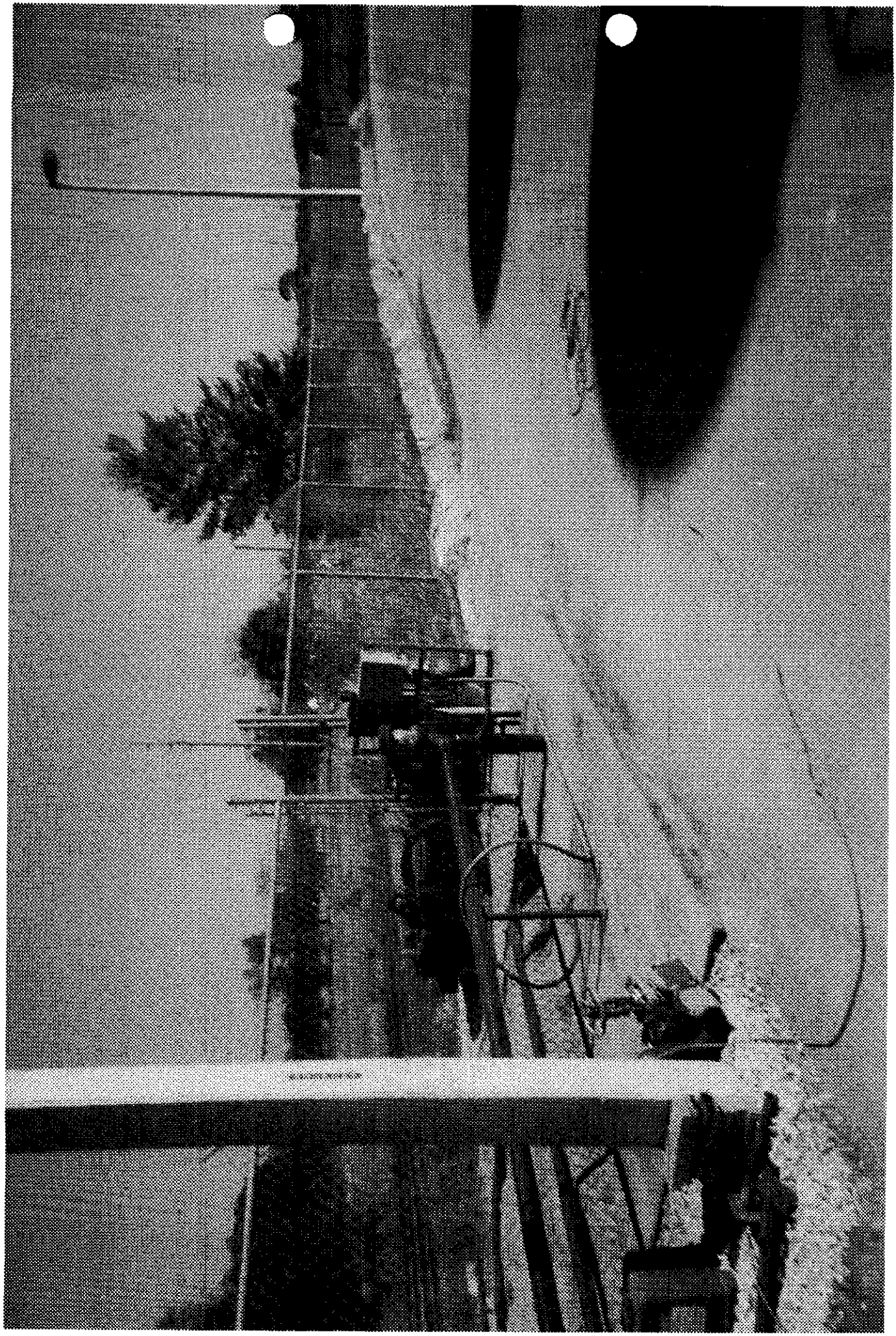
ENCLOSUE 2 - Atlantic Industrial Services, Inc.
Photographs of Old Rail Car Unloading Pad, New Containment and Pump Skid











ENCLOSUE 3 - Atlantic Industrial Services, Inc.
Training Sign In Sheet – Photographs of Standard Label Practice at AIS

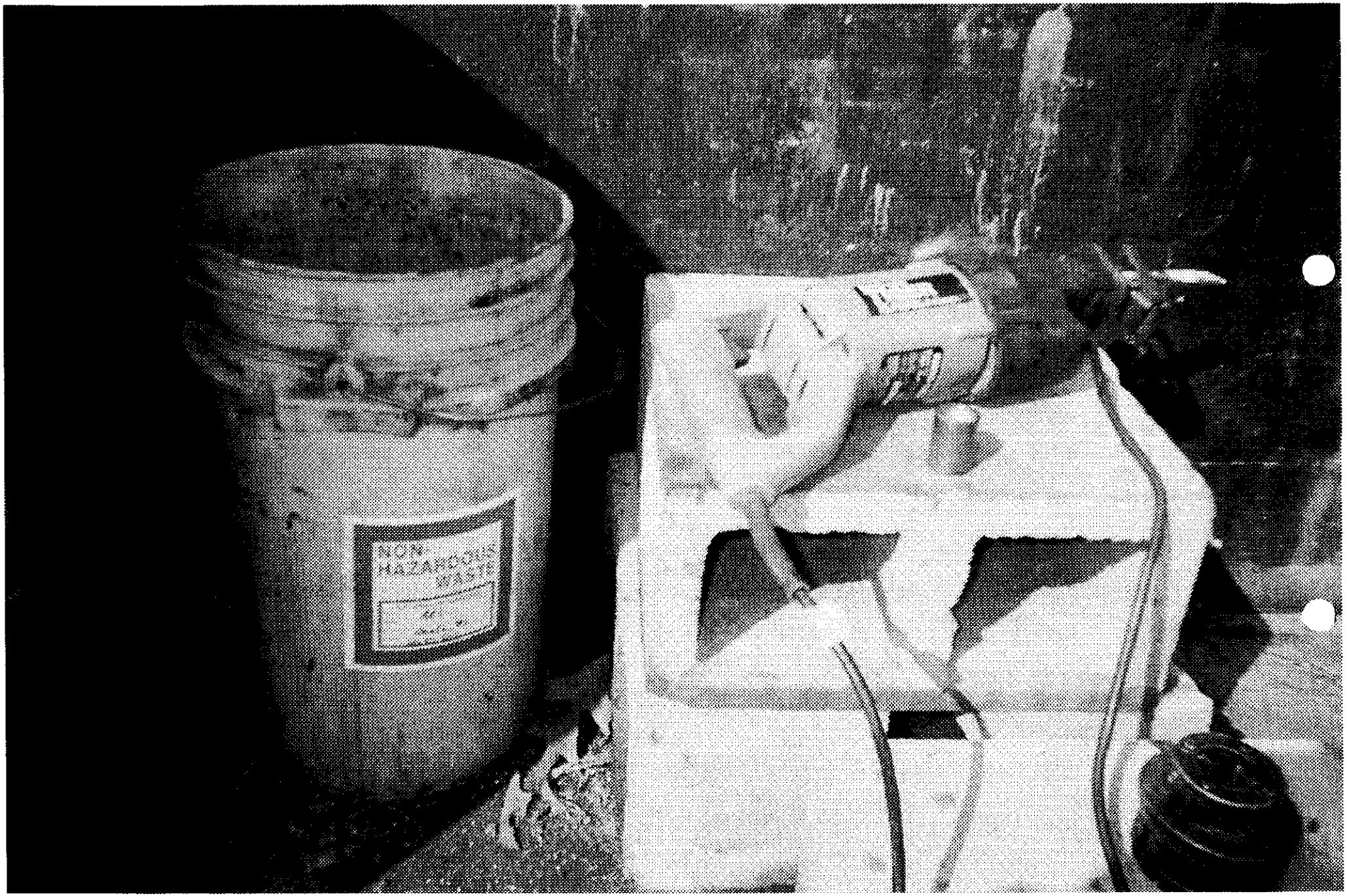
ATLANTIC INDUSTRIAL SERVICES TRAINING LOG

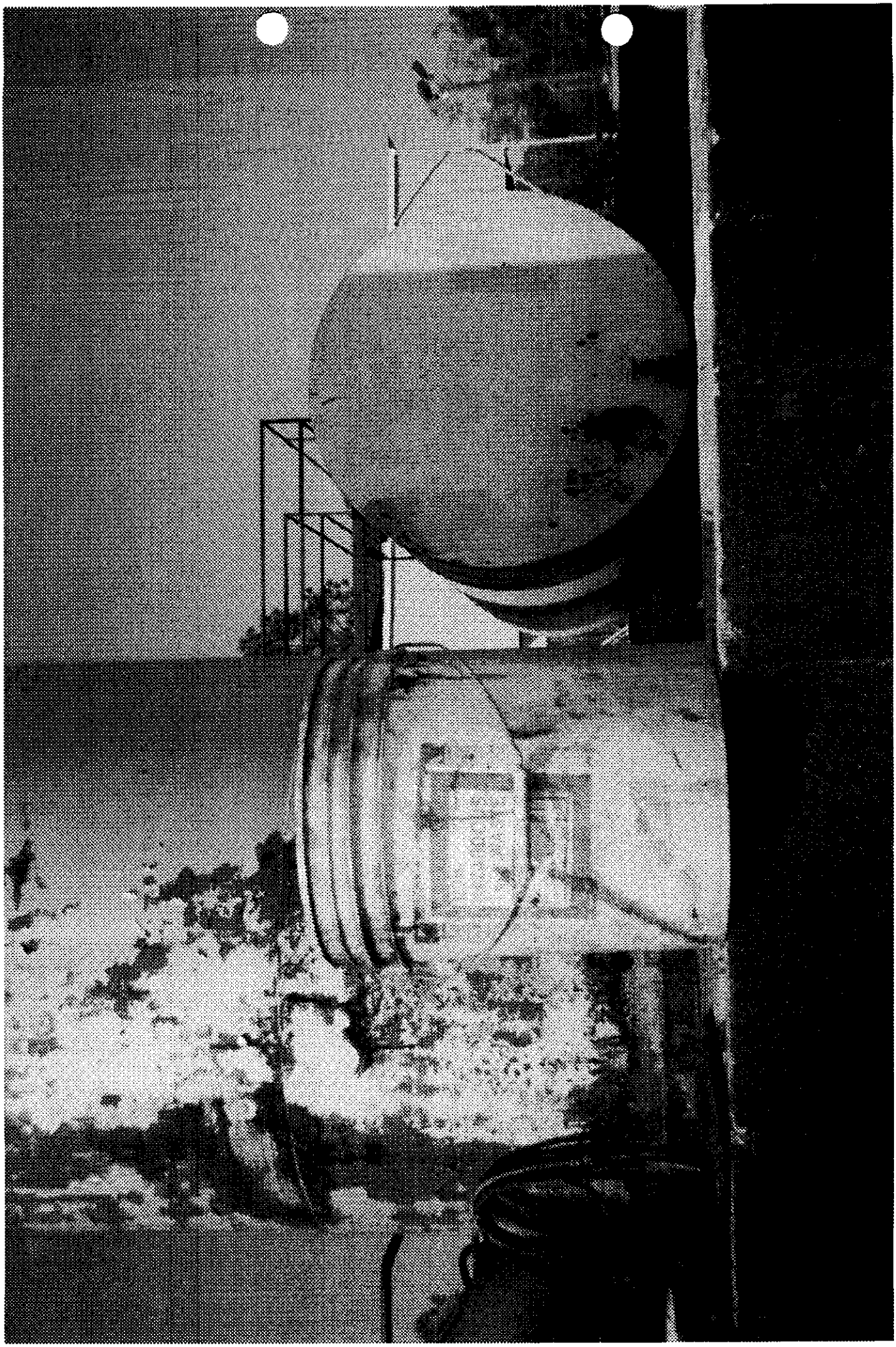
Location: A.I.S. (North) **Date:** 1-15-03

Instructor: Ricky Yaun **Signature:**

Subject: Safty, Housekeeping, Paperwork, unloading, loading, Dr. Pans labeled. all Sample buckets labeled, Samplings.

Employee	Signature
Kurt F. Hollfelder	
Eddie Richardson	
Ernest Gordon	
Joseph Ventry	
Cowboy	
Ricky Ruth	
Robert E Hunt	
MATT DAVIES	


NON
HAZARDOUS
WASTE



ENCLOSUE 4 - Atlantic Industrial Services, Inc.

Halogen Content

Used Oil Services
Anti-Freeze Recycling
Vacuum Services
Absorbent Sales & Disposal
Hazardous Materials
Oil Spill Response
Containment Services

On Time
Environmental Services, Inc.

P. O. Box 465
Lithia, FL 33547
813-655-7115
1-888-755-0554
Fax: 813-657-2443

MEMORANDUM FOR THE RECORD

BY: RICK SMERKERS

DATE: JANUARY 20, 2003

RE: ON – SPECIFICATION USED OIL SENT TO ATLANTIC INDUSTRIAL SERVICES.

THE FOLLOWING LOADS OF USED OIL WERE CHECKED USING A DEXILQ4000 TEST KIT PRIOR TO SHIPMENT TO ATLANTIC INDUSTRIAL SERVICES, INC. AND ALL LOADS LISTED BELOW WERE FOUND TO BE BELOW 1000 PPM(PARTS PER MILLION) OF HALOGENS.

SLIP NUMBER	DATE
5235	8/02/02
5380	8/22/02
5426	8/29/02
5440	8/30/02
5442	8/30/02
5452	8/31/02

IF YOU SHOULD HAVE ANY QUESTIONS, PLEASE CONTACT ME AT 813-655-7115.

RICK SMERKERS
PRESIDENT

HOBO'S OIL, INC.

Memorandum for the Record

By: Mike Evans

Date: January 20, 2003

Re: ON-SPECIFICATION USED OIL SENT TO ATLANTIC INDUSTRIAL SERVICES, INC.

ON-SPECIFICATION USED OIL

The following loads of used oil were checked using a halogens detector or a Q4000 Test Kit prior to shipment to Atlantic Industrial Services, Inc. and were found to be below the detection limit. The total halogen content for these loads of used oil was below 1,000 PPM.

SLIP NUMBER	DATE	FACILITY NAME
5234	8/2/02	HOBO's OIL
5302	8/10/02	HOBO's OIL
5376	8/21/02	HOBO's OIL
5413	8/28/02	HOBO's OIL

I can be reached at (352) 799-2464 or mobile (352) 279-1326 if you should have any questions.

Mike Evans
President

<MEMORANDUM-AIS-1.DOC>

JAN'S OIL SERVICES, INC.

Memorandum for the Record

By: Jan Hammers

Date: January 20, 2003

Re: ON-SPECIFICATION USED OIL SENT TO ATLANTIC INDUSTRIAL SERVICES, INC.

ON-SPECIFICATION USED OIL

The following loads of used oil were checked using a halogens detector prior to shipment to Atlantic Industrial Services, Inc. and were found to be below the detection limit. The total halogen content for these loads of used oil was below 1,000 PPM.

SLIP NUMBER	DATE	FACILITY NAME
5231	8/2/02	JAN'S OIL SERVICE, INC.
5431	8/29/02	JAN'S OIL SERVICE, INC.
5434	8/29/02	JAN'S OIL SERVICE, INC.

I can be reached at (800) 367-3077 or mobile (352) 302-1355 if you should have any questions.

Jan Hammers
President

<MEMORANDUM-AIS-2.DOC>

ENCLOSUE 5 - Atlantic Industrial Services, Inc.
Standard Operating Procedure (SOP) for Used Oil Waste Analysis

ATLANTIC INDUSTRIAL SERVICES, INC.

STANDARD OPERATING PROCEDURE

USED OIL WASTE ANALYSIS PLAN

Prepared By:	Signature:	Date:
T.W. Rudolph, P.E. Environmental Engineer ENVIRONEERING, Incorporated	T W Rudolph	1/20/03
Reviewed By:	Signature:	Date:
B.S. McCully GM Florida Operations Atlantic Industrial Services, Incorporated	Jr McCully	1/21/03
Approved By:	Signature:	Date:
J.R. Feagle Vice-President Atlantic Industrial Services, Incorporated	J R Feagle Jr JF	1/21/03

Used Oil Waste Analysis Plan

INCOMING WASTE

All sampling and analyses will be performed in accordance with AIS's FDEP approved Comprehensive Quality Assurance Plan. Analyses will be performed on every new waste stream submitted for acceptance by AIS. Parameters will vary according to the Generator Waste Profile (GWP) sheet submitted by the generator and via process knowledge. However, at a minimum, each waste stream will be tested for hazardous characteristics in accordance with 40 CFR Part 260-2 Subpart C as follows:

WASTEWATER

Parameter	***Method No.***	***Allowable Limit***
Flash Point	1010	≥140 °F (60 °C)
pH	150.1	>2 or <12.5
TCLP Arsenic	1311/7060	5.0 mg/L
TCLP Barium	1311/7080	100 mg/L
TCLP Cadmium	1311/7131	1 mg/L
TCLP Chromium	1311/7191	5 mg/L
TCLP Lead	1311/7421	5 mg/L
TCLP Mercury	1311/7471	0.2 mg/L
TCLP Selenium	1311/7740	1 mg/L
TCLP Silver	1311/7761	5 mg/L
Benzene	602	500 ug/L

USED OIL

Parameter	***Method No.***	***Allowable Limit***
Flash Point	1010	≥140 °F (60 °C)
pH	150.1	>2 or <12.5 (only if required in new regulations)
Color	110.2	ID
Odor	2150	ID
Halogens	9077 9020 9075	<1000 mg/L (9077A) or <4000 mg/L (9077C) if Rebuttable presumption is satisfied
Physical Appearance	N/A	ID
PCBs	8080	< 2 mg/l

Analyses will be performed on-site by AIS or, if required, by a State certified laboratory.

Each load upon arrival at AIS will be sampled and analyses requested to match the original sample previously approved except for the first load of a new waste stream, which will be sampled and analyzed for the first time. The original sample is usually obtained from the first truckload of waste received, unless the generator sends in a representative sample prior to the first shipment. The analysis from the first truckload is tracked on the Incoming Used Oil Shipment Log that contains the waste stream approval number and the Laboratory Analysis Number. The Laboratory Analysis Number of the first sample analyzed by AIS and the associated analytical report is filed with the waste stream profile independent of the source of the first sample analyzed (generator or first load). If the load is determined to be a hazardous waste or does not represent within reason the original sample studied, it will be returned to the generator.

FREE PRODUCT SHIPPED

All processed used oil fuel will be tested to ensure meeting the requirements of 40CFR Part 279.11. The processed fuel will be placed into a tank until it is full or the production run is decided to be finished. More than one production run may be placed into the product tank as necessary to fill a processed fuel tank. The processed fuel tank will be sampled and analyzed in accordance with this waste analysis plan. The processed fuel tank will remain tagged out of service for the addition of new product until the management decision has been made to begin filling the tank and new analysis is conducted. The analytical results are assigned a Laboratory Analytical Number by the AIS laboratory. The analysis of the processed fuel should take about an hour with fully functional laboratory equipment than has already run the quality control samples. The Laboratory Analytical Number will be recorded on the shipping document and on the AIS Outgoing Used Oil Shipment Log. No additional used oil will be added to the process fuel tank while the Laboratory Analytical Number is being used for out going shipments. At a minimum, the processed oil destined for shipment by AIS for energy recovery or industrial use will be analyzed for the following parameters:

Parameter	***Method No.***	***Allowable Limit***
Arsenic	206.2	5 mg/L
Cadmium	213.1	2 mg/L
Chromium	218.1	10 mg/L
Lead	239.1	100 mg/L
Flashpoint	1010	100 ^{0} F (minimum)
Total Halogens	9075/9020	4,000 mg/L
PCBs	8080	<2 mg/L (total)

Only processed oil, which is under the allowable levels described in 40 CFR Part 279.11 will be shipped for energy recovery or industrial use. Applicable standards for the burning of used oil containing PCBs are imposed by 40 CFR 761.20(e). All documentation associated with the analysis plan will fall under FDEP SOP requirements for record retention and therefore be addressed as per AIS's CompQAP.

GENERATED WASTES

Any waste sludges generated by AIS processes will be tested for hazardous waste determination in accordance with 40 CFR Part 261 Subpart C as follows:

Parameter	*Method No.*	*Allowable Limit*
TCLP Arsenic	1311/7060	5.0 mg/L
TCLP Barium	1311/7080	100.0 mg/L
TCLP Cadmium	1311/7131	1.0 mg/L
TCLP Chromium	1311/7191	5.0 mg/L
TCLP Lead	1311/7421	5.0 mg/L
TCLP Mercury	1311/7471	0.2 mg/L
TCLP Selenium	1311/7740	1.0 mg/L
TCLP Silver	1311/7761	5.0 mg/L
TCLP Organics	1311/624	Refer to 40 CFR 261.24
TCLP Organics	1311/625	Refer to 40 CFR 261.24
TCLP Organics	1311/608	Refer to 40 CFR 261.24
TCLP Organics	1311/615	Refer to 40 CFR 261.24

The solid waste streams generated onsite will be sampled and analyzed one time per year to make a waste determination in accordance with 40 CFR 262. All outgoing hazardous wastes will be transported by a licensed hazardous waste transporter. Designated disposal facilities will be RCRA approved. The facility has not generated hazardous waste to date.

All analyses will be requested via AIS's Chain of Custody (COC) Document. Each sample submitted for analyses will be recorded on AIS's Sample Receiving Log. All analytical results will be recorded in AIS's computer database and hard copies will be provided for generator files.

SOLID WASTE RECEIVED FROM OFF SITE

Solid waste streams received from off site will be profiled into the facility. Only nonhazardous waste will be accepted by AIS. The generator will be required to make a nonhazardous waste determination based upon product knowledge or analytical

information or both for the waste to be processed by AIS. Table C5a will be used to determine if a waste is a characteristic hazardous waste.

Table C5a. CONSTITUENTS THAT WILL BE USED TO PRESCREEN SOLID WASTE GENERATED OFF SITE FOR A NON-HAZARDOUS DETERMINATION

CONSTITUENT/PROPERTY	ACCEPTABLE LIMIT	METHOD
TCLP Metals		**EPA 1311**
Arsenic	below 5.0 ppm	**EPA 1311**
Barium	below 100.0 ppm	**EPA 1311**
Cadmium	below 1.0 ppm	**EPA 1311**
Chromium	below 5.0 ppm	**EPA 1311**
Lead	below 5.0 ppm	**EPA 1311**
Mercury	below 0.2 ppm	**EPA 1311**
Selenium	below 1.0 ppm	**EPA 1311**
Silver	below 5.0 ppm	**EPA 1311**
TCLP Volatile Organics		**EPA 1311/8021**
Benzene	below 0.5 ppm	**EPA 1311/8021**
Carbon Tetrachloride	below 0.5 ppm	**EPA 1311/8021**
Chlorobenzene	below 100.0 ppm	**EPA 1311/8021**
Chloroform	below 6.0 ppm	**EPA 1311/8021**
1,2-Dichloroethane	below 0.5 ppm	**EPA 1311/8021**
1,1-Dichloroethylene	below 0.7 ppm	**EPA 1311/8021**
Methyl Ethyl Ketone	below 200.0 ppm	**EPA 1311/8021**
Tetrachloroethylene	below 0.7 ppm	**EPA 1311/8021**
Trichloroethylene	below 0.5 ppm	**EPA 1311/8021**
Vinyl Chloride	below 0.2 ppm	**EPA 1311/8021**

CONSTITUENT/PROPERTY	ACCEPTABLE LIMIT	METHOD
Flashpoint	Over 140° F	EPA 1010

Waste streams for which the analytical results indicate any constituent or property exceeds acceptable limits, shall be considered hazardous waste and shall not be accepted into the AIS facility in accordance with 40 CFR Part 260-5. Additional testing may be required for waste streams that through generator knowledge may possibly contain constituents from a listed hazardous waste as defined in 40 CFR 261.30 Subpart D.

SAMPLING

Outgoing shipments of solid waste are sampled using an auger. A composite sample is collected by obtaining samples from a minimum of four locations over the entire area of waste to be sampled.

ANALYSIS

Outgoing shipments are divided into two categories:

- Shipments requiring thermal treatment.
- Shipments requiring landfill.

Samples are taken to the AIS laboratory or a state certified laboratory and may be analyzed for the following constituents:

- **Thermal treatment:**

  Total Metals (RCRA-8), Total Volatile Organics, Total Petroleum Hydrocarbons (FLAPRO), Total Organic Halides and PCBs will normally be run on a representative waste stream sample one time per year. Depending upon the treatment facility's permit, additional analysis may involve TCLP-Metals and TCLP Volatile Organics. Additional parameters or fewer parameters may be run on the representative waste stream sample depending on the treatment facility's permit requirements.

- **Landfill:**

  TCLP Metals and TCLP Volatile Organics will normally be run on a representative waste stream sample one time per year. Additional or fewer

analytical parameters may be completed depending upon the facility's permit.

ENCLOSUE 6 - Atlantic Industrial Services, Inc.
Facility Inspections

YEA[illegible] Tank System Visual [illegible]ection Checklist

GE[illegible]AL DESCRIPTION UST OR AST CAPACITY (GALLONS) TANK CONTENTS CHECKLIST ITEMS	JANUARY DATE	FEBRUARY DATE	MARCH DATE	APRIL DATE	MAY DATE	JUNE DATE	JULY DATE	AUGUST DATE	SEPTEMBER DATE	OCTOBER DATE	NOVEMBER DATE	DECEMBER DATE
GENERAL	Y/N or N/A	Y/N or N/A	Y/N or N/A	Y/N or N/A	Y/N or N/A	Y/N or N/A	Y/N or N/A	Y/N or N/A	Y/N or N/A	Y/N or N/A	Y/N or N/A	Y/N or N/A
15. No evidence of leakage around piping flanges, elbows and other fittings on day tank?	N	N	N	N	N	N	N	N	N	N	N	N
16. No suspicious or unusual petroleum odors are present in the tank system area?	N	N	N	N	N	N	N	N	Y	Y	Y	Y
17. No signs od distressed vegetation that could be the result of a petroleum release?	N	Y	N	N	N	N	N	N	N	N	N	N
18. Are manway/manhole covers in place correctly?	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y
19. If present are monitoring well and/or soil vapor well locked or other wise secured?	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
20. SPCC Plan on site and in proper location?	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y
21. Alarms (float sensor, optical sensors) in correct position?	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y
22. Alarm wiring in good condition (not loose or frayed)?	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y
23. Security fence intact?	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y
24. Security lighting working properly?	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y
INSPECTOR'S INITIALS	RY	RR	RR	RR	RR	RR	RR	RR	RR	RR	RR	RR
COMMENTS:												

Note: All releases, spill or leaks of Petroleum product over 25 gallons must be reported to the FDEP by the Spill manager.

TANK SYSTEM VISUAL INSPECTION CHECKLIST

<SPCC TANK SYSTEM VISUAL INSPECTION CHECKLIST-2.XLS>

PAGE 2 OF 2

ENCLOSURE (3)

* An explanation is needed for any item that is answered with a "No"

Tank System Visual ... on Checklist

YEAR

GENERAL DESCRIPTION UST OR AST CAPACITY (GALLONS) TANK CONTENTS CHECKLIST ITEMS	JANUARY DATE	FEBRUARY DATE	MARCH DATE	APRIL DATE	MAY DATE	JUNE DATE	JULY DATE	AUGUST DATE	SEPTEMBER DATE	OCTOBER DATE	NOVEMBER DATE	DECEMBER DATE
GENERAL	Y/N or N/A	Y/N or N/A	Y/N or N/A	Y/N or N/A	Y/N or N/A	Y/N or N/A	Y/N or N/A	Y/N or N/A	Y/N or N/A	Y/N or N/A	Y/N or N/A	Y/N or N/A
1. Tank System Contingency Plan on site and at appropriate location?	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y
2. If tank certificate of registration is required to be posted, is certificate posted?	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y
3. Are tank system components properly painted or identified?	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y
4. If tank system Alarm Panel exists, is panel powered and not in Alarm or System Failure condition?	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y
5. Is tank system Spill Kit on site?	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y
6. Is tank system Spill kit properly stocked?	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y
7. Is Spill Kit readily available and in designated location?	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y
8. Access to fill components locked or otherwise secured?	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y
9. Is tank surface free of dents, pits, cracks, rust or other damage?	Y	Y	Y	Y	Y	Y	N	Y	Y	Y	Y	Y
10. Is tank piping free of dents, pits, cracks, rust or other damage?	Y	Y	Y	Y	Y	Y	N	N	N	N	N	N
11. No evidence of leakage around piping flanges, elbows and other fittings?	Y	Y	Y	Y	Y	Y	Y	N	N	N	N	N
12. Are piping sumps clear and unobstructed?	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y
13. Are Manway area free of product and other debris?	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y
14. Is secondary containment structure intact with drain valves closed?	Y	Y	Y	Y	Y	Y	Y	N	N	N	N	N

COMMENTS:

TANK SYSTEM VISUAL INSPECTION CHECKLIST

<SPCC TANK SYSTEM VISUAL INSPECTION CHECKLIST-2.XLS>

PAGE 1 OF 2

ENCLOSURE (3)

* An explanation is needed for any item that is answered with a "No"

RECORD OF TELEPHONE COMMUNICATION

PERSON CALLING: LP

PERSON CONTACTED: Jack McCully

FILE/CASE NAME/#: AIS

TIME From: 09:45 To: _____

PHONE: _____

PHONE: (561) 762-4227 cell?

COUNTY: Marion

DATE: 1/22/03

SUMMARY

There was a 1-day delay in getting info from one of the generators.

Package went in mail yesterday evening. Tom Rudolph was supposed to call to explain delay

ACTION REQUIRED

CC: _____

SIGNED: [signature] DATE: 1/22/03

InterOffice Memorandum

CENTRAL DISTRICT

TO: Atlantic Industrial Services (AIS) File – Marion County

THROUGH: Leah Proffitt
Environmental Specialist
Hazardous Waste

FROM: John White
Environmental Specialist

DATE: December 20, 2002

SUBJECT: Informal Meeting with AIS on December 20, 2002

Leah Proffitt, Lu Burson, and John White met with Jack McCully, Operation Manager for Atlantic Industrial Services (AIS) and Tim Rudolph, AIS consultant, to discuss potential violations noted at AIS during the last compliance inspection.

The meeting began with a discussion of each specific violation noted in the inspection report:

a) Used oil released at the pump for loading rail tankers is being addressed. The pump will be moved so that the connections and pump housing will be within a secondary containment system. This should take place within 30 days. Following the moving of the pump, the soil will be sampled and remediated, if necessary. In the interim employees have been trained to ensure no oil is released from hoses outside the containment area.

b) It is the company policy that all used oil containers be properly labeled. This is even an item that is looked for during weekly inspections. AIS will ensure that used oil containers are properly labeled in the future.

c) Halogen testing of incoming loads was not always necessary according to Mr. McCully. Loads of used oil coming from other transporters or processors were assumed to have been tested or "sniffed" to ensure the halogen levels were okay. We requested any proof (test records, sniffer records, etc.) the facility could provide to back up this statement.

d) Used oil in the secondary containment system was discussed. The facility representatives noted that the tank system is inspected on a regular basis and has not been found to be leaking. It was recommended that they remove the oily water from the secondary containment system and then observe the tanks and piping to verify that there are no leaks.

It was recommended that AIS review the requirements for management of used oil filters that are currently shipped to a solid waste landfill in Georgia. It was noted that AIS is considering purchasing equipment to crush used oil filters into cubes that can be shipped for reclamation as scrap metal.

jw

2/20/02

12. Violations

a) Removing pump station. Quick disconnects were added after first.
Piping moved adj. to waste pit.
Sampling done w/in 30 d of today

b) Perform weekly insp. of tank/pan & containers. Not sure why [illegible] not labeled

c) [illegible] generator knowledge
→ Need to show originating facility tested oil.
They [illegible] [illegible] H5005. Will [illegible]
[illegible] by end of year.
Will provide [illegible] [illegible] [illegible] loads.
Will test all incoming loads.

d) All manifolds & pipings will be replaced in conjunction w/ [illegible] pump renovation.

Updated drawings will be sent when [illegible] [illegible] not made.

Tires

- getting new "tire" shredders that take 'wires' out of them.
- Will be baling them for recycling, not landfill!

Department of
Environmental Protection

Jeb Bush
Governor

Central District
3319 Maguire Boulevard, Suite 232
Orlando, Florida 32803-3767

David B. Struhs
Secretary

AIS

Enforcement Meeting

December 20, 2002

NAME	AFFILIATION	PHONE w/ area code	E-MAIL
Tim Rudolph	ENVIRONEERING	904 665.0100	timrudolph@alltel.net
Jack McCully	Atlantic Industrial	561 7624227	jmccully@aiscv.com
Lu Burson	FDEP	407-893-3323	lu.burson@floridadep.net
John White	FDEP	4078433323	John.White@floridadep.net
Leah Griffith	FDEP	-"-	leah.griffith@ - - -

359 Cypress Road ♦ Ocala, FL 34472 ♦ (800) 328-8252
(352) 687-0688 ♦ Website: www.usedoil.com ♦ Fax: (352) 687-8511

Atlantic
Industrial Services, Inc.

December 20, 2002

Ms. Vivian F. Garfein
Director of District Management
Florida Department of Environmental Protection
3319 Maguire Boulevard, Suite 232
Orlando, FL 32803-3767

Subject: FDEP letter on Used Oil Management dated November 7, 2002.

Dear Ms. Vivian,

The following response is provided for the subject letter for the section 12 items.

12 (a) 40 CFR 279.52 (a)(1) The pump for loading rail tankers is being moved and will be reinstalled so that the connections and pump housing are with in secondary containment. The prior pump location will be properly assessed and closed. The contaminated soil will be removed, transported and properly treated. A detailed soil sampling plan that in includes sampling procedures and corrective actions will be submitted with in thirty days.

12 (b) 40 CFR 279.22 (c) The unlabeled container of used oil was result of the action of one individual that did not follow existing Atlantic Industrial Services, Inc. management procedures and employee training. It is possible that the bucket was placed there by a contractor working at the facility. Contractors are briefed on proper used oil container marking at the beginning of jobs. The entire facility is inspected on a weekly basis to ensure that used oil containers are marked with the words "used oil". The containers provided to the Atlantic Industrial Services, Inc. employees are marked with the words "used oil". The Atlantic Industrial Services, Inc. employees will be given additional training on the marking of used oil containers. Atlantic Industrial Services, Inc. will ensure that containers accumulating used oil are labeled accordingly.

12 (c) 40 CFR 279.44(a) Atlantic Industrial Services, Inc. used knowledge of the used oil in accordance with 40 CFR 279.44(b) for the loads in question. These particular loads of used oil were from known sources. The regulations state that the determination of whether or not the used oil contains greater that 1000 ppm total halogens shall be made by either testing the oil or by applying knowledge of the halogen content of the used oil in light of the materials or processes used.

Atlantic Industrial Services, Inc. will provide a written Standard Operating Procedure (SOP) with in thirty days and will conduct training with the appropriate employees when the SOP is finalized.

12 (d) 40 CFR 279.54(b) The existing tanks, piping and secondary containment are inspected in accordance with the Used Oil Permit and the facility Spill Prevention, Control and Countermeasures (SPCC) Plan. The inspections have not identified any leaks in the tanks, piping or secondary containment. The night prior to the inspection it rained at the facility. The rainwater was in the secondary containment less than 24 hours at the time of the inspection. The rainwater and residual oil was removed in accordance with the facility Used Oil Permit and SPCC Plan. The existing facility inspections will be submitted with in 30 days. Atlantic Industrial Services, Inc. will minimize releases of used oil to the secondary containment.

Please do not hesitate to call me at (352) 687-0688 should you have any questions or should additional information be needed. As always it is a pleasure to work with you.

Sincerely,

Brian S. McCully
General Manager Florida Operations
<AIS-FDEP-15 >

cc: Tim Rudolph, ENVIRONEERING, Inc.
John R. Feagle, Atlantic Industrial Services, Inc.