

APPLICATION FORM FOR A USED OIL PROCESSING FACILITY PERMIT

Received
AUG 27 2010
BSHW

Part I

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

A. General Information

1. New _____ Renewal ☒ Modification ☒ Date old permit expires 10/11/2010

2. Revision number 2

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

☒ generators (Subpart C)
☒ transporters (Subpart E)
_____ burners of off-spec used oil (Subpart G)
☒ marketers (Subpart H)

or

_____ are disposing of used oil (Subpart I)

4. Date current operation began: July 28, 2001

5. Facility name: Water Recovery, LLC

6. EPA identification number: FLR000069062

7. Facility location or street address: 1819 Albert Street Jacksonville, FL 32202

8. Facility mailing address:

1819 Albert Street Jacksonville, FL 32202
Street or P.O. Box City State Zip Code

9. Contact person: Gregory Reynolds Telephone: (904) 475-9320

Title: Vice President

Mailing Address:

1819 Albert Street Jacksonville, FL 32202
Street or P.O. Box City State Zip Code

10. Operator's name: Water Recovery, LLC Telephone: (904) 475-9320

Mailing Address:

1819 Albert Street Jacksonville, FL 32202
Street or P.O. Box City State Zip Code

11. Facility owner's name: DLAC/WRI, LLC Telephone: (904) 475-9320

Mailing Address:

1819 Albert Street Jacksonville, FL 32202
Street or P.O. Box City State Zip Code

12. Legal structure:

_____ corporation (indicate state of incorporation) _____

_____ individual (list name and address of each owner in spaces provided below)

☒ partnership (list name and address of each owner in spaces provided below)

_____ other, e.g. government (please specify) _____

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

Name: Steven T. Jenkins, Owner & Members Manager

Mailing Address:

1962 Colina Court Atlantic Beach, FL 32233

Street or P.O. Box City State Zip Code

Name: See Attachment "Part I Item 12"

Mailing Address:

Street or P.O. Box City State Zip Code

Name: _____

Mailing Address:

Street or P.O. Box City State Zip Code

Name: _____

Mailing Address:

Street or P.O. Box City State Zip Code

13 Site ownership status: ☐ owned ☐ to be purchased ☐ to be leased _____ years

☒ presently leased; the expiration date of the lease is: 7/1/2026

If leased, indicate:

Land owner's name: DLAC/WRI, LLC

Mailing Address:

1819 Albert Street Jacksonville, FL 32202

Street or P.O. Box City State Zip Code

14 Name of professional engineer Timothy W. Rudolph Registration No. 39617

Mailing Address:

109 Azalea Point Drive South Ponte Vedra Beach, FL 32082

Street or P.O. Box City State Zip Code

Associated with: _____

B. SITE INFORMATION

1. Facility location:

County: Duval

Nearest community: Jacksonville

Latitude: 30:19:45:0 Longitude: 81:37:25:0

Section: 45 Township: 25 Range: 27E

UTM # _____ / _____ / _____ / _____

2. Facility size (area in acres): 1.5

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.

C. OPERATING INFORMATION

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

2. List applicable EPA hazardous waste codes:

D001, D002, D030, F003, F005

Note 1 – Miscellaneous hazardous waste is generated by laboratory operations

Note 2 – No hazardous waste is generated by used oil processing operations

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 C.3

4. Attach 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 4, page 4).

The facility's detailed process description is labeled as Attachment Management Procedure 4200

5. The following parts of the facility's operating plan should be included as attachments to the permit application. (See item 5 on pages 4 and 5):

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 Management Procedure 4100

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 Management Procedure 4300

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 Management Procedure 4400

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 6, page 5).

The preparedness and prevention plan is labeled as Attachment Management Procedure 4600

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 7 on pages 5 and 6).

The contingency plan is labeled as Attachment see Management Procedure 4600

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 Management Procedure 4700

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 9, pages 6 and 7).

The closure plan is labeled as Attachment Management Procedure 4800

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 10, page 7).

A description of employee training is labeled as Attachment Employee Used Oil Training

APPLICATION FORM FOR A USED OIL PROCESSING PERMIT

PART II – CERTIFICATION

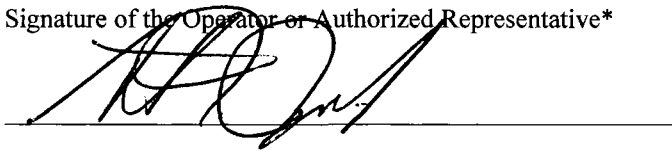
TO BE COMPLETED BY ALL APPLICANTS

Form 62-710.901(a). Operator Certification

Facility Name: Water Recovery, LLC EPA ID# FLR000069062

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 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*



Steven T. Jenkins, Manager

Name and Title (Please type or print)

Date: 8/26/10 Telephone: (904) 475-9320

* If authorized representative, attach letter of authorization.

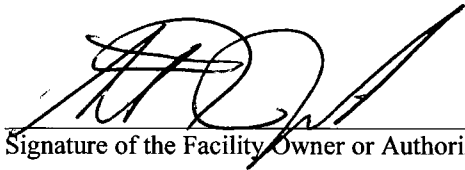
APPLICATION FROM FOR A USED OIL PROCESSING PERMIT

PART II – CERTIFICATION

Form 62-710.901(b). Facility Owner Certification

Facility Name: Water Recovery, LLC EPA ID# FLR000069062

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 Facility Owner or Authorized Representative*

Steven T. Jenkins, Manager

Name and Title (Please type or print)

Date: 8/26/10 Telephone: (904) 475-9320

* If authorized representative, attach letter of authorization.

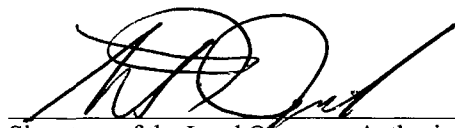
APPLICATION FROM FOR A USED OIL PROCESSING PERMIT

PART II – CERTIFICATION

Form 62-710.901(c) Land Owner Certification

Facility Name: **Water Recovery, LLC** EPA ID# **FLR00069062**

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 Land Owner or Authorized Representative*

Steven T. Jenkins, Manager

Name and Title (Please type or print)

Date: 8/26/10 Telephone: (904) 475-9320

* If authorized representative, attach letter of authorization.

DEP Form# 62-710.901(6)(d)
Form Title Used Oil Processing Facility
Permit Application
Effective Date June 9, 2005

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

Form 62-710.901(d) 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.
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.

Please Print or Type

_____ Initial Certification _____ X _____ Recertification

1. DEP Facility ID Number: FLR000069062 2. Tank Numbers: 1P,2P,3P,4P,5P,6P,7P,8P,9P,10P

3. Facility Name: Water Recovery, LLC

4. Facility Address: 1819 Albert Street Jacksonville, FL 32202

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.

Timothy W. Rudolph

Signature

Timothy W. Rudolph, P.E.

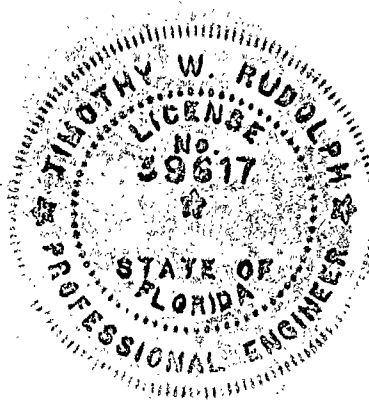
Name (please type)

Florida Registration Number: 39617

Mailing Address: 109 Azalea Point Drive South Ponte Veda Beach, FL 32082
Street or P.O. Box City State Zip

Date: 8/5/10 Telephone (904) 665-0100

[PLEASE AFFIX SEAL]



Part I Item 12. Schedule of Partnership Owners

John W. Connolly, Jr.
23 Cassia Court
Amelia Island, FL 32034
904-261-6157
jacon23@comcast.net

James D. Daniel
246 Edgewater Brand Dr.
Jacksonville, FL 32259
904-287-4804
jdaniel@moranenvironmental.com

Russell B. Gordon, Sr.
1216 Trailwood Dr.
Neptune Beach, FL 32266
904-607-5346
Reynolds@logon.net

Harry B. Horner
7428 Trails End
Jacksonville, FL 32277
904-743-6260
MontyandSally@Bellsouth.net

Posey H. Jenkins
2119 Beach Avenue
Atlantic Beach, FL 32233
904-249-7607
phj@comcast.net

Steven T. Jenkins
1962 Colina Court
Atlantic Beach, FL 32233
(904) 241-7886
sjenkins@comcast.net

Howard C. Serkin
712 Spinnakers Reach
Ponte Vedra Beach, FL 32082
(904) 354-9600
hcapgroup@aol.com

Lou J. Simmons, Trustee
Ralph E. Simmons, Marital
Deduction Trust
24 Sea Marsh Road
Amelia Island, FL 32034
(904) 277-5112
simmonsv@aipfl.com

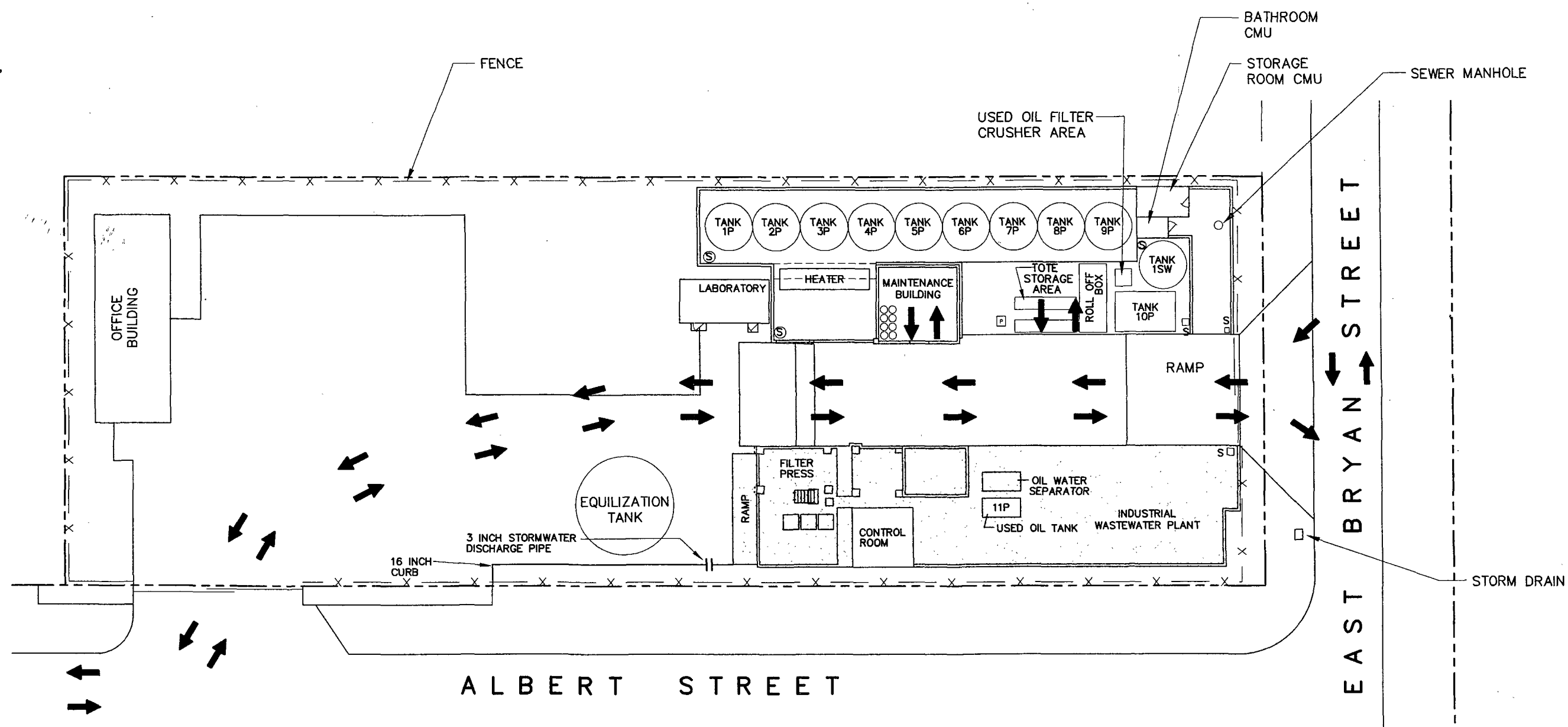
Jean B. Zechella Living
Trust dated August 30, 1991
1004 Vicars Woods Road
Ponte Vedra, Beach, FL 32082
(904) 280-9614

OVERSIZE
DOCUMENT WAS
REMOVED AND
INSERTED INTO
OCULUS
SEPARATELY.

SEE: OVERSIZED
DRAWING #1



SCALE: 1" = 30'



LEGEND

→ TRAFFIC FLOW PATTERN

S SUCTION

D DISCHARGE

TANK NUMBER	CAPACITY (GALLONS)	CONTENTS OF TANK
1P	23,232	USED OIL
2P	23,232	USED OIL
3P	23,232	USED OIL
4P	21,445	USED OIL
5P	20,778	USED OIL
6P	25,806	USED OIL
7P	21,446	PETROLEUM CONTACT WATER
8P	21,446	INDUSTRIAL WASTEWATER/PETROLEUM PRODUCTS
9P	20,833	INDUSTRIAL WASTEWATER/PETROLEUM PRODUCTS
10P	10,000	INDUSTRIAL WASTEWATER
11P	500	USED OIL
SW1	30,000	STORMWATER

FIGURE 4 - MATERIAL AND WASTE TRAFFIC PATTERN

PREPARED FOR:
WATER RECOVERY, LLC
1819 ALBERT STREET
JACKSONVILLE, FL 32202

PREPARED BY:
ENVIRONEERING, INC.
1735 EMERSON STREET, SUITE 3
JACKSONVILLE, FL 32207
904-665-0100

CHECKED BY: TWR	DRAWN BY: GCR
APPROVED BY: TWR	DATE: 8/04/10
JOB NO. 4034	SCALE: 1"=30'
REVISED:	4034-6 DRAWING NO.

WATER RECOVERY, LLC
1819 ALBERT STREET
JACKSONVILLE, FL 32202

USED OIL PERMIT



USED OIL TANKS – LINEUP VIEW

WATER RECOVERY, LLC
1819 ALBERT STREET
JACKSONVILLE, FL 32202

USED OIL PERMIT



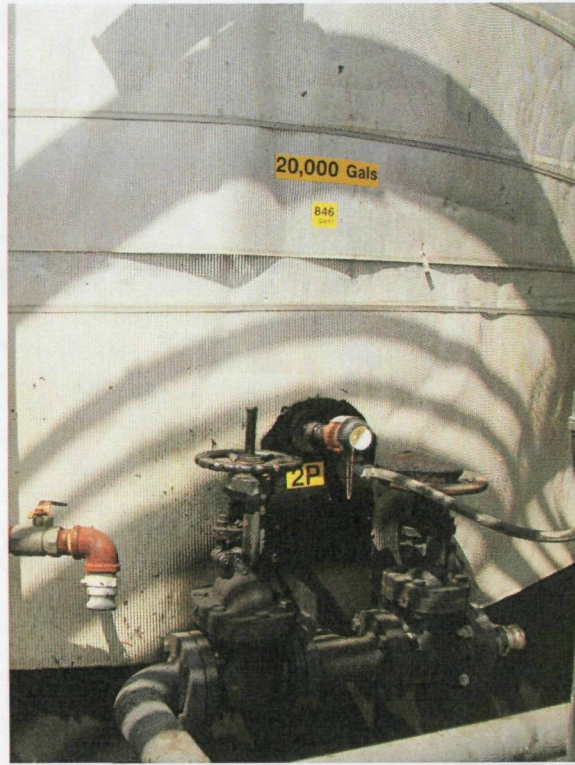
TANK 1P



TANK 1P LABELED USED OIL

WATER RECOVERY, LLC
1819 ALBERT STREET
JACKSONVILLE, FL 32202

USED OIL PERMIT



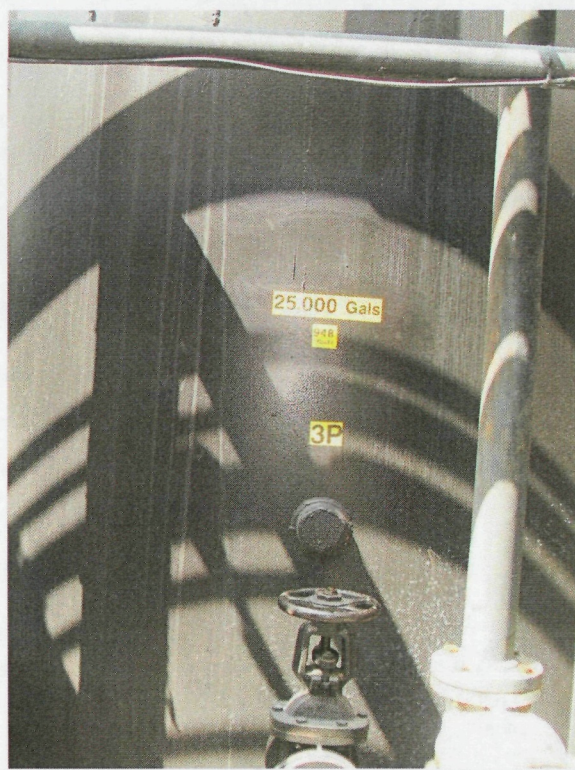
TANK 2P



TANK 2P LABELED USED OIL

WATER RECOVERY, LLC
1819 ALBERT STREET
JACKSONVILLE, FL 32202

USED OIL PERMIT



TANK 3P



TANK 3P LABELED USED OIL

WATER RECOVERY, LLC
1819 ALBERT STREET
JACKSONVILLE, FL 32202

USED OIL PERMIT



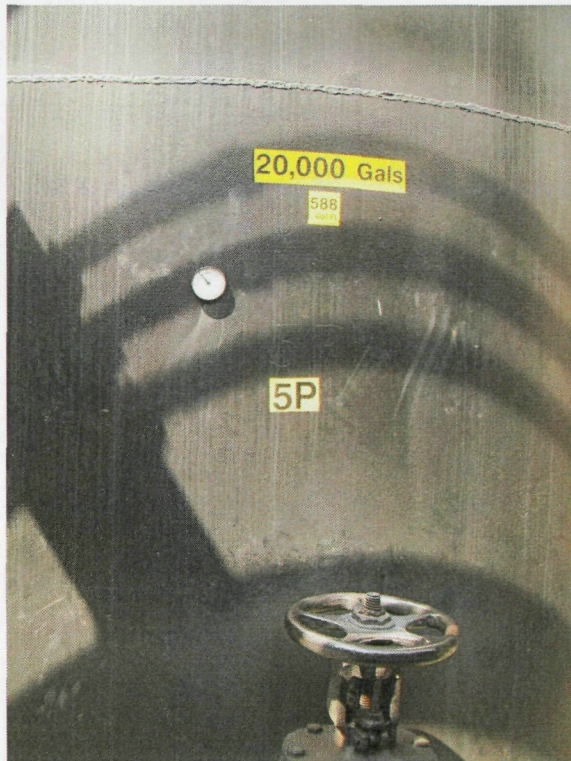
TANK 4P



TANK 4P LABELED USED OIL

WATER RECOVERY, LLC
1819 ALBERT STREET
JACKSONVILLE, FL 32202

USED OIL PERMIT



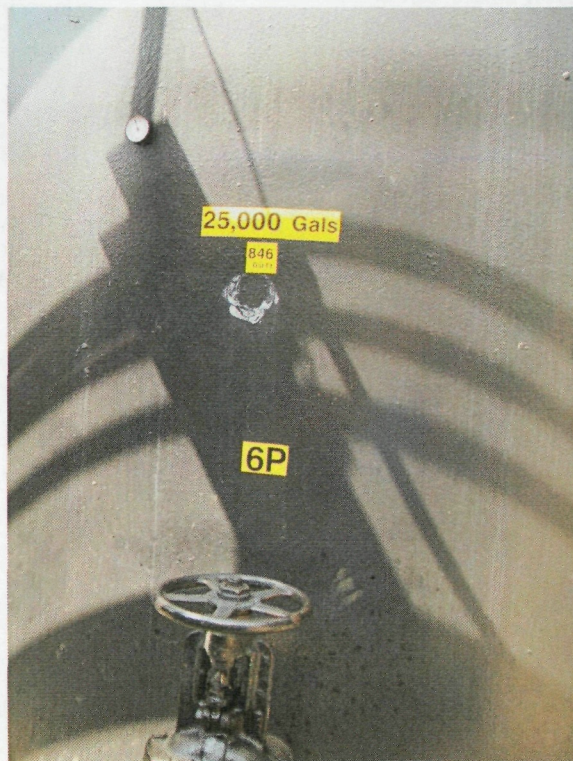
TANK 5P



TANK 5P LABELED USED OIL

WATER RECOVERY, LLC
1819 ALBERT STREET
JACKSONVILLE, FL 32202

USED OIL PERMIT



TANK 6P



TANK 6P LABELED USED OIL

WATER RECOVERY, LLC
1819 ALBERT STREET
JACKSONVILLE, FL 32202

USED OIL PERMIT



TANK 7P



TANK 7P LABELED PCW

WATER RECOVERY, LLC
1819 ALBERT STREET
JACKSONVILLE, FL 32202

USED OIL PERMIT



TANK 8P



TANK 8P LABELED USED OIL

WATER RECOVERY, LLC
1819 ALBERT STREET
JACKSONVILLE, FL 32202

USED OIL PERMIT



TANK 9P



TANK 9P LABELED USED OIL

WATER RECOVERY, LLC
1819 ALBERT STREET
JACKSONVILLE, FL 32202

USED OIL PERMIT



TANK 10P



TANK 10P LABELED USED OIL

C. OPERATING INFORMATION

3. Brief Narrative Overview of Facility Operations

The Water Recovery, LLC facility has two buildings of which one is a laboratory. The other building is the main office, which has a room with laboratory equipment for metal analysis. The facility has other structures that include a tank farm, a drum storage area, a roll off box storage area, a sumped work area, a chemical storage building and maintenance building.

The nature of the WR LLC business is to (1) receive, store, process, treat and market used oil, (2) manage and process used oil filters, (3) receive, store, process, treat and discharge industrial wastewater, (4) receive, store, process and treat petroleum contact water (PCW) and (5) receive, store, process, treat and market fuel products.

The activities that WRI intends to conduct include used oil storage, used oil processing, used oil treatment, used oil marketing, used oil filter storage, used oil filter processing and used oil filter disposal.

Petroleum Contact Water (PCW) is defined by Florida Administrative Code (F.A.C.) 62-740 will be accepted by Water Recovery, LLC. Petroleum Contact Water will be managed in accordance with the enclosure (13) Water Recovery, LLC Management Procedure 4900.

The WR LLC anticipated total number of employees is eight plus or minus two as the workload varies. The variability in the workforce will be most likely in the number of Operators. The types of employees proposed for the facility include approximately four office staff and four field personnel. The office staff includes Receptionist/Accountant (1), Plant Manager (1), Lab Manager (1), and President/Vice-President (1). Field personnel are either the Plant Operator (1) or the Operators (3+2).

WATER RECOVERY, LLC

1819 Albert Street
Jacksonville, Florida 32202

USED OIL PROCESS FLOW PLAN

MANAGEMENT PROCEDURE 4200

REVISION: 2

<4200TP-3.WPS>

Prepared By:

Gregory G. Reynolds
Vice President and General Manager
Water Recovery, LLC

Signature:



Date:

8/26/10

Approved By:

Steven T. Jenkins
President
Water Recovery, LLC

Signature:



Date:

8/26/10

Table of Contents

	<u>Page Number</u>
1.0 INTRODUCTION	1
2.0 PROCESS DESCRIPTION	1
2.1 Analysis.....	1
2.2 Treatment	2
2.2.1 Primary settling.....	2
2.2.2 Heat treatment.....	2
2.2.3 Heat treatment with chemical addition	3
2.3 Storage	3
2.4 Other Processing	3
3.0 FACILITY DESCRIPTION	4
3.1 Access Control [4(a)].....	4
3.2 Buildings [4(b)].....	4
3.3 Tanks and Containers [4(c)].....	4
3.4 Loading and Unloading Areas [4(d)].....	4
3.5 Drainage [4(e)].....	5
3.6 Runoff Control System [4(f)].....	5
TABLE 1. USED OIL ANALYTICAL PARAMETERS	2
FIGURE (1) WATER RECOVERY, LLC USED OIL FACILITY SITE PLAN	
FIGURE (2) HAZARDOUS MATERIAL STORAGE LOCATION	
FIGURE (3) USED OIL PROCESSING AREA	
ENCLOSURE (1) WATER RECOVERY, LLC WASTE PROFILE	
ENCLOSURE (2) SECONDARY CONTAINMENT FLUID REMOVAL RECORD	

1.0 INTRODUCTION

This management procedure covers the Water Recovery, LLC (WRI) Used Oil Process Flow Plan. This plan discusses the overall scope of the operation including analysis, treatment, storage and other processing. The description begins with the arrival of an incoming shipment and goes through the departure of an out going shipment. The size and location of tanks and containers are included. A detailed site map with a written description is also included.

2.0 PROCESS DESCRIPTION

The WRI Used Oil Processing is completed by allowing the oil and water to separate in individual tanks. The water is decanted into an industrial wastewater tank and the used oil into a tank filled mostly with oil. The used oil is sampled, analyzed and classified when enough used oil is collected. The used oil is then either transported off site, or treated, analyzed, classified and then transported off site. The used oil will be transported off site for one of the following actions including but not limited to incineration, recycling, marketing, fuel blending or redistillation. The WRI used oil treatment is accomplished by heat treatment or heat treatment with chemical addition. The used oil may be retreated as necessary to obtain a marketable product.

The WRI Used Oil Processing begins with the completion of a waste profile as provided by enclosure (1). Upon review and approval of the waste profile, an approval number is assigned by WRI personnel before the used oil is allowed to be accepted at WRI. The used oil is scheduled into the WRI facility once the waste stream is approved. The used oil will be sampled and screened by fingerprint analysis when it arrives at the WRI facility. The used oil shipment is either accepted or rejected based upon the fingerprint analysis results. The used oil is transferred to a used oil tank if the shipment is accepted. The used oil is allowed to settle and separate in the tank. The water is decanted into an industrial wastewater tank and the used oil into a tank filled mostly with oil. When enough used oil is collected the used oil is sampled, analyzed and classified. The used oil may be processed and treated to remove water by heat treatment with or without chemical addition. The batch of used oil may be retreated as necessary to achieve a marketable product. The processed and treated used oil will be analyzed and classified. The used oil shipment is scheduled with the receiving facility. The used oil is manifested and transported using a bill of lading to a permitted used oil burner, marketer or processing facility.

2.1 Analysis

The used oil will be analyzed twice in the WRI Used Oil Process. The first analysis is the fingerprint analysis on incoming shipments. The second analysis is the used oil parameters for the out going shipment. The standard parameters for each set of analyses are provided in Table 1.

Table 1. USED OIL ANALYTICAL PARAMETERS

<u>FINGERPRINT ANALYSIS</u>	<u>OUT GOING SHIPMENT - To Burner</u>	<u>OUT GOING SHIPMENT – To Marketer or Processor</u>
HALOGEN CONTENT	HALOGEN CONTENT	HALOGEN CONTENT
pH	TOTAL LEAD	FLASH POINT
COLOR	TOTAL CHROMIUM	QUANTITY
ODOR	TOTAL CADMIUM	% WATER
QUANTITY	TOTAL ARSENIC	
FLASH POINT	FLASH POINT	
	QUANTITY	

2.2 Treatment

The treatment of used oil at WRI will be accomplished using primary settling, heat treatment and heat treatment with chemical addition. The treatment methods utilized will allow the used oil and water to be separated. The water is pumped from the bottom of the treatment tank into an industrial wastewater tank. The industrial wastewater is sent to a permitted industrial wastewater pretreatment facility.

2.2.1 Primary settling

Used oil is treated at WRI by stationary settling in aboveground storage tanks. Primary settling is when the liquid mixture is allowed to remain stationary so that the used oil and the water separate into different phases. The oil and water are allowed to separate by gravity in the aboveground tanks for a period of hours up to several days. The stationary settling is the method of oil water separation selected by WRI as the first step of treatment for most used oil waste streams.

2.2.2 Heat treatment

Used oil may be processed by heat treatment to further remove water. The used oil is placed into the insulated tank and is heated to the optimum temperature to achieve the maximum separation of water. Tank number 2P will be primarily used for used oil heat treatment. The used oil is allowed to cool and water is given sufficient time to separate from the used oil. The heat-treated mixture may be transferred to a different tank for cooling and separation.

2.2.3 Heat treatment with chemical addition

Used oil may be processed by heat treatment with chemical addition to remove water. The used oil is placed into the insulated tank and is heated to the optimum temperature to achieve the maximum separation of water using a demulsifier. Tank number 2P will be primarily used for used oil heat treatment with chemical addition. The demulsified used oil is allowed to cool and water is given sufficient time to separate from the used oil. The heat-treated mixture may be transferred to a different tank for cooling and separation.

2.3 Storage

Used Oil is stored in aboveground tanks with a concrete secondary containment area. Figure 1 shows the location of individual tanks with each tanks capacity. Used oil, used oil filters, used oil residuals and used oil solid waste may be stored in 55-gallon drums. Used oil filters and used oil residuals may be stored in roll off boxes that are of 15, 20, or 30 cubic yard capacity. Roll off boxes will be stored inside secondary containment. The facility used oil filter/drum crusher will be stored and operated inside secondary containment. Frac tanks will not be used for used oil processing. The maximum quantity of used oil filters, used oil residuals and used oil solid waste that will be stored on site will be 7,350 gallons. For compliance with this permit, the following conversions shall be used:

55 gallon drum = 55 gallons
15 cubic yard container = 3030 gallons
20 cubic yard container = 4040 gallons
30 cubic yard container = 6060 gallons

Storage in other types of containers may occur at the facility with prior written notification to FDEP as to the type and capacity of the container.

2.4 Other Processing

Used oil filters will be processed by crushing the filters to remove the used oil. The spent filter material will either be recycled or shipped to a permitted solid waste landfill. Used oil residuals will be received and consolidated or shipped directly off site to a recycling facility or a permitted solid waste landfill. The original shipping container will be cleaned in accordance with 40 CFR Part 261.7. The WRI Used Oil Facility does not plan to conduct any other used oil processing at the present time. Should other processing become necessary this section will be revised.

3.0 FACILITY DESCRIPTION

The facility description describes the access control, buildings, tanks, containers, loading and unloading areas, drainage and runoff control system as shown in Figure 1.

3.1 Access Control [4(a)]

The site access is controlled by the main gate located at the southwest corner of the property as shown in Figure 1. The gate is wide enough to allow the movement of semi-tractor trailers and tankers into the facility. The east gate allows traffic to exit the facility. Access to the property may be through either gate. The facility may be operated up to 24 hours per day depending on business requirements. The facility gates will be locked at a minimum when the facility is not staffed.

3.2 Buildings [4(b)]

The facility has three buildings for administrative operation. Supply and several offices are located in the Office Building. The Receptionist/Accountant, Plant Manager and President/Vice-President work in the Office Building. The Laboratory has office space for the Lab Manager and the analytical equipment. The Control Room Building is where the Operators work.

3.3 Tanks and Containers [4(c)]

WRI used oil is stored in tanks and containers. The aboveground tanks and their capacities are shown in Figure 1. Containers are stored on the containment slab noted as the Tote Storage Area in Figure 2. The used oil processing area is delineated in Figure 3. The containers of used oil are emptied daily. The containers of used oil filters, used oil residue and used oil solid waste will be stored until they are consolidated, processed or shipped off site. The empty containers are cleaned, crushed and recycled as scrap metal. Containers are not normally brought to the WRI facility as they are most often pumped out using a vacuum truck. Vacuum trucks and tanker trucks are commonly used to transport used oil to WRI.

3.4 Loading and Unloading Areas [4(d)]

The WRI loading and unloading area for used oil is the Sumped Work Area as shown in Figure 1. The Sumped Work Area is made from concrete with an epoxy finish. The Sumped Work Area is cleaned and decontaminated daily. The Sumped Work Area is a transfer zone where used oil is loaded and unloaded.

3.5 Drainage [4(e)]

The WRI yard drainage is to the south side of the property. The drainage along Albert Street is to the east. A single storm drain is located at the southeast corner of the facility. The storm drain flows to the north and then to the east at the back of the property along Bryan Street. The drainage is sufficient to prevent standing water after most rainfall events.

3.6 Runoff Control System [4(f)]

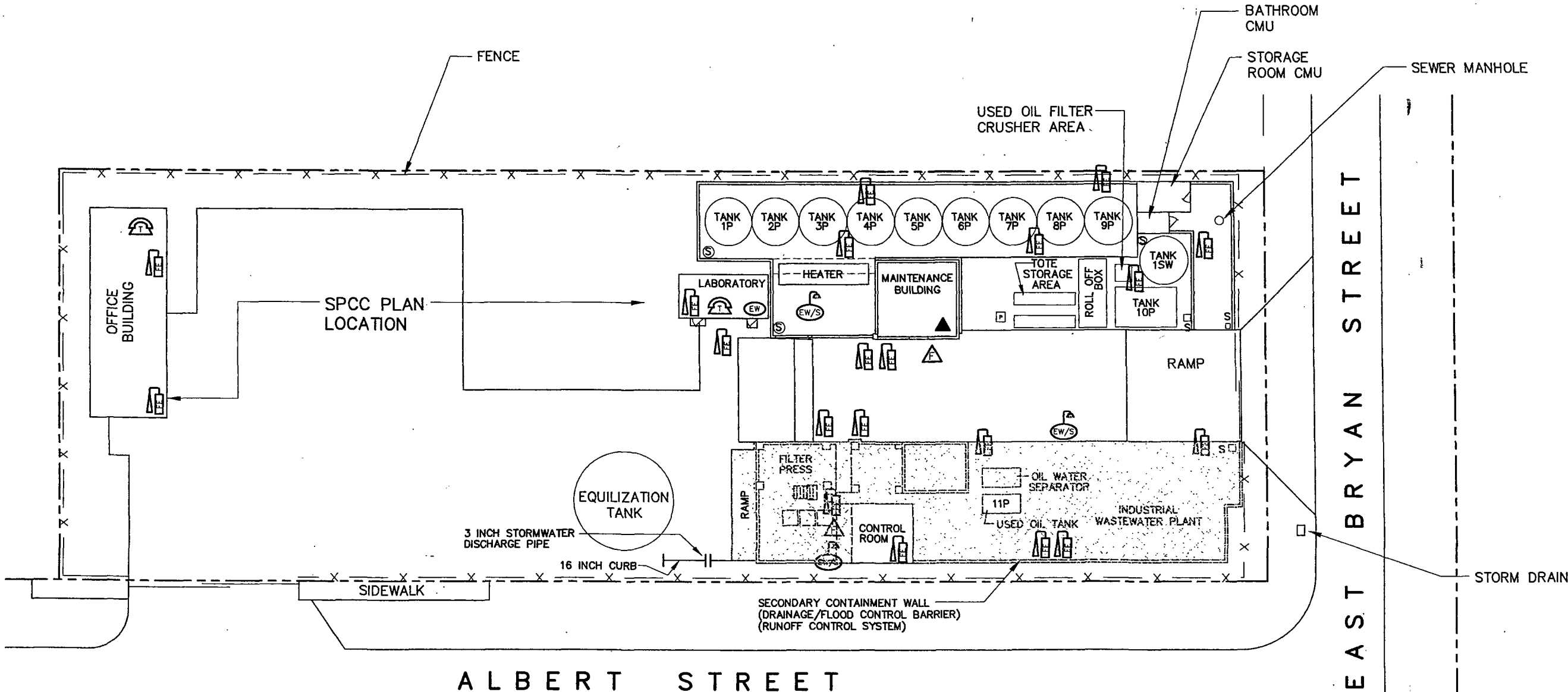
The WRI yard drainage is to the south side of the property. The storm drain flows to the north and then to the east at the back of the property along Bryan Street. The rainwater that falls into the processing area is collected in the secondary containment system. The stormwater that collects in the secondary containment does not run off the property as it is collected in the secondary containment. The secondary containment system serves as a runoff control system as it prevents rainwater from leaving the site.

The stormwater that has a visible sheen will be pumped into a collection tank marked industrial wastewater or may be pumped out using a vacuum truck or tanker truck. The industrial wastewater will be sent to a facility with an industrial wastewater pretreatment permit. The industrial wastewater will be pretreated and discharged in accordance with the receiving facilities industrial wastewater pretreatment permit.

The standard operating practice will be to manage all stormwater as outlined above, however an unusual significant rain event may necessitate the following alternate. The stormwater that does not contain a visible sheen may be discharged to grade after an Oil and Grease scan has been completed and the result does not exceed 5 ppm in accordance with Florida Administrative Code (FAC) 62-302.530(49)(a). The discharge of rainwater to grade will be documented by using the enclosure (2) WRI form, Secondary Containment Fluid Removal Record. The discharge of rainwater accumulated in the secondary containment to grade will be in accordance with all applicable local, state and federal rules and regulations.



SCALE: 1" = 30'



LEGEND

- SPILL KIT
- FIRE EXTINGUISHER
- TELEPHONE
- EMERGENCY EYEWASH/SHOWER
- EMERGENCY SHOWER
- FIRE ALARM / AIR HORN
- DECONTAMINATION SUPPLIES

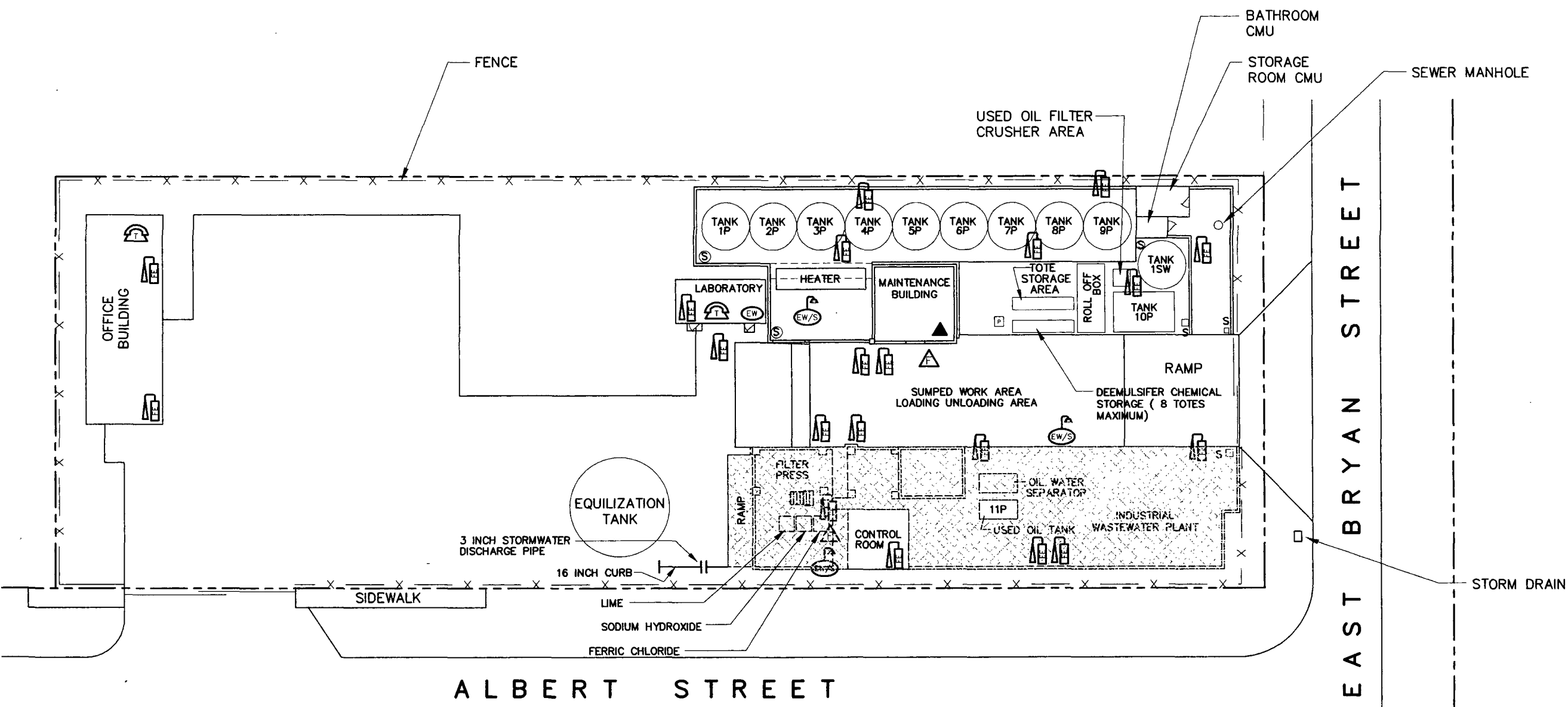
TANK NUMBER	CAPACITY (GALLONS)	CONTENTS OF TANK
1P	23,232	USED OIL
2P	23,232	USED OIL
3P	23,232	USED OIL
4P	21,445	USED OIL
5P	20,778	USED OIL
6P	25,806	USED OIL
7P	21,446	PETROLEUM CONTACT WATER
8P	21,446	INDUSTRIAL WASTEWATER/ PETROLEUM PRODUCTS
9P	20,833	INDUSTRIAL WASTEWATER/ PETROLEUM PRODUCTS
10P	10,000	INDUSTRIAL WASTEWATER
11P	500	USED OIL
SW1	30,000	STORMWATER

FIGURE 1 – WRI USED OIL FACILITY SITE PLAN – WRI-4200-1/4800-1/SPCC

PREPARED FOR: WATER RECOVERY, LLC 1819 ALBERT STREET JACKSONVILLE, FL 32202	PREPARED BY: ENVIRONEERING, INC. 1735 EMERSON STREET, SUITE 3 JACKSONVILLE, FL 32207 904-665-0100	CHECKED BY: TWR	DRAWN BY: GCR
		APPROVED BY: TWR	DATE: 8/04/10
		JOB NO. 4034	SCALE: 1"=30'
		REVISED:	4034-2 DRAWING NO.



SCALE: 1" = 30'



LEGEND






- SPILL KIT
-  FIRE EXTINGUISHER
-  TELEPHONE
-  EMERGENCY EYEWASH/SHOWER
-  EMERGENCY SHOWER
-  FIRE ALARM / AIR HORN

FIGURE 2 – HAZARD MATERIAL STORAGE LOCATION –WRI-4200-2

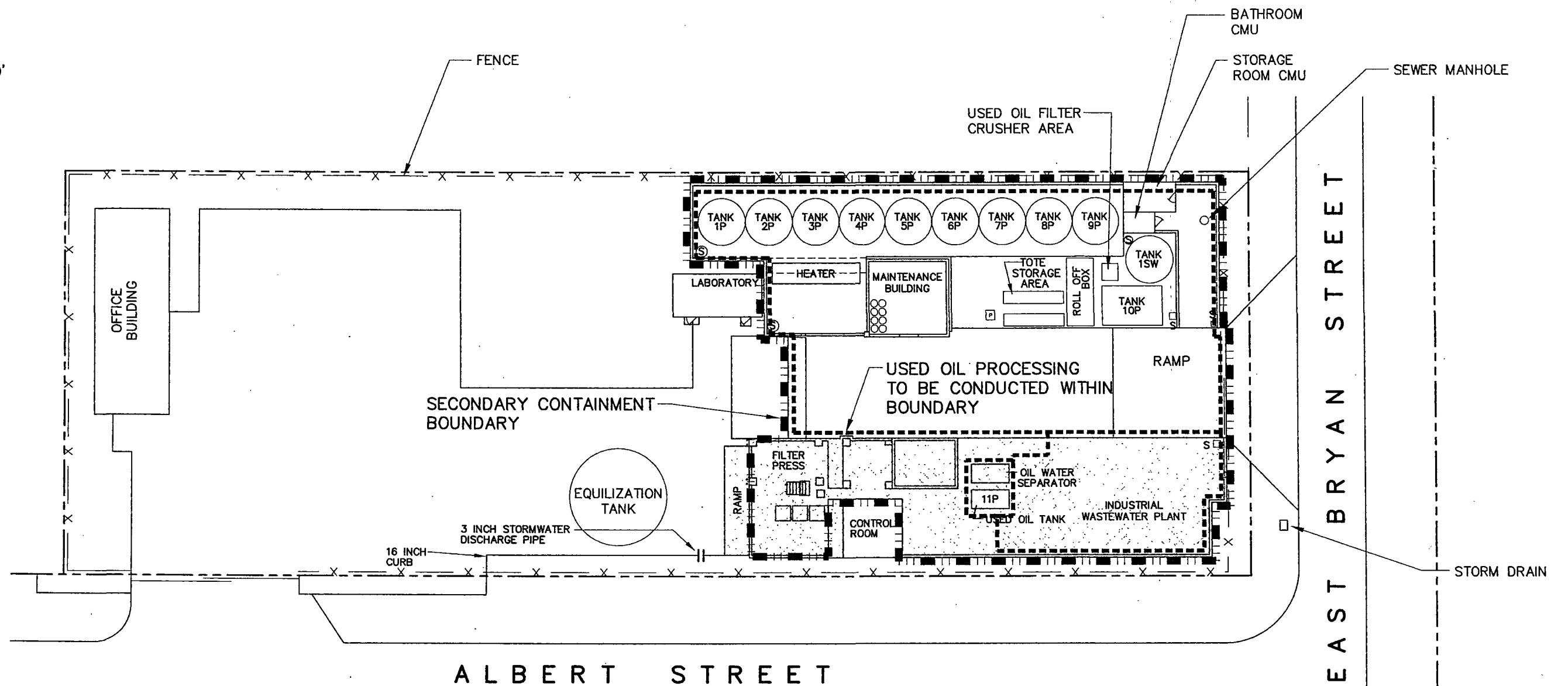
PREPARED FOR:
WATER RECOVERY, LLC
1819 ALBERT STREET
JACKSONVILLE, FL 32202

PREPARED BY:
ENVIRONEERING, INC.
1735 EMERSON STREET, SUITE 3
JACKSONVILLE, FL 32207
904-665-0100

CHECKED BY: TWR	DRAWN BY: GCR
APPROVED BY: TWR	DATE: 8/04/10
JOB NO. 4034	SCALE: 1"=30'
REVISED:	4034-3 DRAWING NO.



SCALE: 1" = 30'



LEGEND

- USED OIL PROCESSING PERMIT BOUNDARY
- SECONDARY CONTAINMENT BOUNDARY

TANK NUMBER	CAPACITY (GALLONS)	CONTENTS OF TANK
1P	23,232	USED OIL
2P	23,232	USED OIL
3P	23,232	USED OIL
4P	21,445	USED OIL
5P	20,778	USED OIL
6P	25,806	USED OIL
7P	21,446	PETROLEUM CONTACT WATER
8P	21,446	INDUSTRIAL WASTEWATER/ PETROLEUM PRODUCTS
9P	20,833	INDUSTRIAL WASTEWATER/ PETROLEUM PRODUCTS
10P	10,000	INDUSTRIAL WASTEWATER
11P	500	USED OIL
SW1	30,000	STORMWATER

FIGURE 2 - USED OIL PROCESSING AREA

PREPARED FOR:
WATER RECOVERY, LLC
1819 ALBERT STREET
JACKSONVILLE, FL 32202

PREPARED BY:
ENVIRONEERING, INC.
1735 EMERSON STREET, SUITE 3
JACKSONVILLE, FL 32207
904-665-0100

CHECKED BY: TWR	DRAWN BY: GCR
APPROVED BY: TWR	DATE: 8/04/10
JOB NO. 4034	SCALE: 1"=30'
REVISED:	4034-7 DRAWING NO.

**Water Recovery, LLC****Waste Stream Profile**

Date Submitted: _____

Generator Information

Company Name		Contact Name	
Street Address		Phone Number	
City, State ZIP		Fax Number	
Broker Information			

Waste Stream Background Information

Waste Stream Name			
Generation Location			
Generating Process			
Previous Approval Number			
Volume per Load	Gallons in <input type="checkbox"/> Truck <input type="checkbox"/> Drums <input type="checkbox"/> Other		
Delivery Frequency	<input type="checkbox"/> Once <input type="checkbox"/> Loads per <input type="checkbox"/> Week <input type="checkbox"/> Month <input type="checkbox"/> Year		

Waste Classification

Actual % Oil	Range	Classification	Instructions
%	< 20 %	Wastewater	Disregard the Used Oil Characteristics Section of the profile
	20-80 %	Mixed	Fill out the BOTH sections each for the appropriate phase
	> 80 %	Used Oil	Disregard the Wastewater Characteristics Section of the profile

Wastewater Characteristics☐ Analytical data available? (Please attach)

Check if Present	Concentration (mg/L)
Antimony <input type="checkbox"/>	
Arsenic <input type="checkbox"/>	
Barium <input type="checkbox"/>	
Cadmium <input type="checkbox"/>	
Chromium <input type="checkbox"/>	
Cobalt <input type="checkbox"/>	
Copper <input type="checkbox"/>	
Lead <input type="checkbox"/>	
Mercury <input type="checkbox"/>	
Molybdenum <input type="checkbox"/>	
Nickel <input type="checkbox"/>	
Selenium <input type="checkbox"/>	
Silver <input type="checkbox"/>	
Tin <input type="checkbox"/>	
Titanium <input type="checkbox"/>	
Vanadium <input type="checkbox"/>	
Zinc <input type="checkbox"/>	
Oil & Grease <input type="checkbox"/>	
Cyanide <input type="checkbox"/>	
Nitrogen (T) <input type="checkbox"/>	

☐ Analytical data available? (Please attach)

Total Suspended Solids (wt%):					
<input type="checkbox"/> <1	<input type="checkbox"/> 1-5	<input type="checkbox"/> 6-10	<input type="checkbox"/> 11-20	<input type="checkbox"/> >20	
pH Range (<2 or >12.5 is a hazardous waste)					
<input type="checkbox"/> 2-4	<input type="checkbox"/> 5-6	<input type="checkbox"/> 7	<input type="checkbox"/> 8-9	<input type="checkbox"/> 10-12.5	
COD Range (mg/L) (if known)					
<input type="checkbox"/> <100	<input type="checkbox"/> 101-500	<input type="checkbox"/> 501-1000	<input type="checkbox"/> 1001-3000	<input type="checkbox"/> 3001-6000	<input type="checkbox"/> >6000

Organic Pollutants Present	Concentration (mg/L)

Does this waste stream contain any of the following?

☐ PCBs ☐ Sulfides ☐ AFFF ☐ Electro less Plating ☐ EDTA **None**Are multiple layers present? ☐ Yes ☐ No

Describe _____

Describe the odor (if any) _____

Describe the color (if any) _____

**Water Recovery, LLC****Waste Stream Profile****Used Oil Characteristics**☐ Analytical data available? (Please attach)

Characteristic	Actual	Range			
Flash Point (Closed Cup - °F)		<input type="checkbox"/> < 140	<input type="checkbox"/> 141-200	<input type="checkbox"/> > 200	
Total Solids (%)		<input type="checkbox"/> < 1	<input type="checkbox"/> 1-5	<input type="checkbox"/> 6-10	<input type="checkbox"/> 11-20
pH (<2 or >12.5 is hazardous)		<input type="checkbox"/> 2-4	<input type="checkbox"/> 5-6	<input type="checkbox"/> 7	<input type="checkbox"/> 8-9
Viscosity		<input type="checkbox"/> Low	<input type="checkbox"/> Medium	<input type="checkbox"/> High	
Percent Moisture		<input type="checkbox"/> <1	<input type="checkbox"/> 1-5	<input type="checkbox"/> 6-10	<input type="checkbox"/> 11-20
BTU/pound		<input type="checkbox"/> < 2000	<input type="checkbox"/> 2001-6000	<input type="checkbox"/> 6001-10000	<input type="checkbox"/> 10001-16000

Check if Present	Does this waste stream contain any of the following?
Arsenic	<input type="checkbox"/> PCBs <input type="checkbox"/> Sulfides <input type="checkbox"/> AFFF <input type="checkbox"/> Electro less Plating <input type="checkbox"/> EDTA <input type="checkbox"/> None
Cadmium	Are multiple layers present? <input type="checkbox"/> Yes <input type="checkbox"/> No
Chromium	Describe _____
Lead	
Total Organic Halogen	Describe the odor (if any) _____
PCBs	
Other	Describe the color (if any) _____

Additional Information and Comments**Certification**

I certify that this waste is not classified as, mixed with, or derived from a hazardous or special waste under the Resource Conservation and Recovery Act (40 CFR Part 261). I further certify that the above information is true and accurate to the best of my knowledge and is based on analysis of a representative sample of the waste in accordance with EPA guidelines and documents, or on my thorough knowledge of the waste and the generating process.

Name: _____

Title: _____

Signature: _____

Date: _____

To be completed by WRI Personnel OnlyApproved? ☐ Yes ☐ No By: _____ Date: _____ Approval Number: _____

ENCLOSURE (1)

WRI
Water Recovery, LLC
WATER RECOVERY, LLC

PETROLEUM CONTACT WATER (PCW) PRODUCER
CERTIFICATION AND DOCUMENTATION

1. GENERATOR NAME: _____
2. PROCESS KNOWLEDGE CERTIFICATION: ☐ YES ☐ NO
(CHOOSE ONE).
3. ANALYTICAL TEST RESULT CERTIFICATION: ☐ YES ☐ NO
(CHOOSE ONE – ATTACH TEST REPORTS IF YES IS
CIRCLED).
4. DOES THE PCW CONTAIN A RECOVERABLE PRODUCT:
☐ YES ☐ NO (CHOOSE ONE).
5. IS THE PCW TO BE MANAGED AS A PRODUCT? ☐ YES ☐ NO
(CHOOSE ONE).
6. WILL THE DISPOSAL FACILITY MANAGE THE PCW FOR
PRODUCT RECOVERY?
☐ YES ☐ NO (CHOOSE ONE).
7. DOES THE PCW CONTAIN LEVELS OF HAZARDOUS
CONSTITUENTS ABOVE THOSE FOUND IN THE SOURCE OF
THE PCW? ☐ YES ☐ NO (CHOOSE ONE).

NAME (PRINTED): _____

SIGNATURE: _____

TITLE: _____ DATE: _____

ENCLOSURE (2)

WATER RECOVERY, LLC

1819 Albert Street
Jacksonville, Florida 32202

USED OIL WASTE ANALYSIS PLAN

MANAGEMENT PROCEDURE 4100

REVISION: 2

<4100TP-5.WPS>

Prepared By:

Gregory G. Reynolds
Vice President and General Manager
Water Recovery, LLC

Signature:



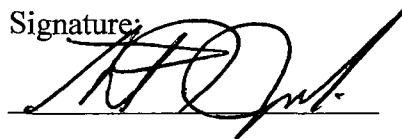
Date:

8/26/10

Approved By:

Steven T. Jenkins
President
Water Recovery, LLC

Signature:



Date:

8/26/10

Table of Contents

	<u>Page Number</u>
1.0 INTRODUCTION	1
2.0 USED OIL REBUTTABLE PRESUMPTION [5(a)]	1
2.1 Exemptions	1
2.1.1 metal working oils or fluids	1
2.1.1 chloroflorocarbons	1
3.0 WASTE DETERMINATIONS	2
4.0 SAMPLING PLAN [5(a)(i)]	2
4.1 Sampling Method	2
4.2 Sampling Frequency	3
4.3 Sampling Location	3
4.4 Analysis Methods [5(a)(ii)&(iii)]	4
4.5 Halogen Content	5
5.0 PROCESSING OR RE-REFINING	5
6.0 ON SPECIFICATION USED OIL FUEL DETERMINATION	5
ENCLOSURE (1) WRI WASTE PROFILE	
ENCLOSURE (2) WRI WASTE TRACKING FORM	
ENCLOSURE (3) WRI RETAIL OIL SALE TRACKING FORM	

1.0 INTRODUCTION

This management procedure covers the written analysis plan requirements of title 40 Code of Federal Regulations (CFR) Parts 279.53, 279.55 and 279.72. Water Recovery, LLC (WRI) will conduct business in accordance with this analysis plan when processing used oil. WRI is a used oil processor because more than 25,000 gallons of used oil is stored in the tank farm, the used oil is stored more than 35 days and the water and solids are removed from the used oil by primary settling in individual tanks, heat treatment or chemical treatment.

2.0 USED OIL REBUTTABLE PRESUMPTION [5(a)]

Used oil containing more than 1,000 ppm total halogens is presumed to be a hazardous waste because it has been mixed with halogenated hazardous waste listed in subpart D of 40 CFR Part 261. Persons may rebut this presumption by demonstrating that the used oil does not contain hazardous waste by using analytical methods from SW-846, Edition III, to show that the used oil does not contain significant amounts of halogenated hazardous constituents listed in appendix VIII of 40 CFR Part 261.

2.1 Exemptions

Two used oil waste streams are exempt from the rebuttable presumption. These waste streams are metalworking oils/fluids containing chlorinated paraffins or used oils contaminated with chloroflorocarbons.

2.1.1 metal working oils or fluids

The rebuttable presumption does not apply to metalworking oil or fluids containing chlorinated paraffins, if they are processed through a tolling arrangement as described in 40 CFR 279.24(c), to reclaim metalworking oils or fluids. The presumption does apply to metalworking oils or fluids if such oil or fluids are recycled in any other manner or disposed.

2.1.2 chloroflorocarbons

The rebuttable presumption does not apply to used oils contaminated with chloroflorocarbons (CFCs) removed from refrigeration units where the CFCs are destined for reclamation. The rebuttable presumption does apply to used oil from sources other than refrigeration units.

3.0 WASTE DETERMINATIONS

Water Recovery, LLC (WRI) will use either waste analysis or process knowledge to make a used oil waste determination. Only three personnel at WRI are authorized to make the waste determination and assign an approval number to the company waste profile, approving the waste determination. These individuals hold the positions of Plant Manager, Operations Manager and Laboratory Manager. The criteria that will be used to determine load acceptance or rejection will be based upon the information on and attached to the approved waste stream profile. An approval number will be assigned to each used oil waste stream that is acceptable for delivery to WRI. The used oil will be accepted as long as the finger print parameters are within 30% of the specified ranges on the WRI Fingerprint Analysis Acceptance Criteria Form, or they do not exceed absolute limits as specified by regulation. Incoming shipments and each generator's used oil must be analyzed for halogen content.

4.0 SAMPLING PLAN [5(a)(i)]

This section of the WRI Used Oil Waste Analysis Plan covers the 40 CFR Part 279.55 regulations on used oil sampling.

4.1 Sampling Method

The used oil will be sampled in accordance with one of the methods in appendix I of 40 CFR part 261. The last two procedures are from "Test methods for the Evaluation of Solid Waste, Physical/Chemical Methods". The method which will be most routinely used by WRI to sample the used oil tankers will be a grab sample obtained by using a dipper, thief or by catching a sample of the material in a beaker or other suitable container. Each incoming shipment of used oil will be examined for homogeneity by visually comparing samples taken from both the top and bottom (upper and lower strata) of the tank. A grab sample will be obtained where the load appears to be homogeneous for fingerprint analysis. A coliwasa will be used to obtain a vertical composite sample of the shipment for fingerprint analysis if the samples taken from the upper and lower strata appear different in color, consistency, viscosity, odor or other parameters. The specific methods that will be used include the following:

- Extremely Viscous Liquids- [ASTM Standard D140]
- Samplers and Sampling Procedures for Hazardous Waste Streams – [EPA-600/2-80-018]
- Containerized Liquid Wastes COLIWASA – ["Test methods for the Evaluation of Solid Waste, Physical/Chemical Methods." EPA]
- Liquid waste in pits ponds, lagoons, and similar reservoirs. - ["Test methods for the Evaluation of Solid Waste, Physical/Chemical Methods." EPA]

4.2 Sampling Frequency

Waste streams that are classified based upon generator knowledge will be sampled and analyzed for the finger print parameters once the used oil arrives at WRI. Sampling of a used oil waste stream will be completed at the frequency as determined by the environmental professional approving the waste stream profile. The sampling frequency will be a maximum of one year as a corporate policy. The criteria for determining the frequency of analysis for a waste stream is based upon generator integrity or waste stream variability as evaluated by the WRI environmental professional. Used oil will be sampled and analyzed for the finger print parameters at the time of arrival. Waste streams will be evaluated once per year for a waste stream determination.

All incoming shipments and each generator's waste oil must be analyzed for halogen content. All incoming shipments must receive finger print analysis identified in Management Procedure 4200 page 2, Table 1. USED OIL ANALYTICAL PARAMETERS. The criteria that will be used to determine load acceptance or rejection will be based upon the information approved on the waste stream profile. An approval number will be assigned to each used oil waste stream that is acceptable for delivery to WRI. The used oil will be accepted as long as the finger print parameters are within 30% of the specified ranges on the WRI Waste Stream Profile, nor exceed absolute limits as specified by regulation. Each used oil stream's fingerprint will be recorded in writing according to the set of parameters as specified in this permit, on the WRI Waste Tracking Form. WRI Waste Stream Profile Forms will be available to Receiving Station personnel for reference purposes. The finger print analyses performed on each incoming shipment of used oil will be recorded in the appropriate blocks of the WRI Waste Tracking Form.

4.3 Sampling Location

All analysis may be performed either on site or off site. Water Recovery, LLC employees will typically perform fingerprint analyses on site. However, fingerprint analyses may be performed off-site by a suitable professional testing laboratory as needed. The out going shipment parameters may be completed onsite or may be shipped off site to a suitable professional testing laboratory.

4.4 Analysis Methods

The following used oil parameters shall be analyzed by the Environmental Protection Agency (EPA) method specified or an equivalent method. The metal analysis methods are listed for furnace procedures. Inductively Coupled Plasma methods may be used instead of the furnace procedures. Quantitative field tests such as the Dexsil Hydroclor-Q or Dexsil Chlor-D-Tect Q4000 may be used to check used oil loads for total organic halogens as a quality control measure.

<u>PARAMETER</u>	<u>EPA METHOD NUMBER</u>
Arsenic	7060/3040
Cadmium	7130/3040
Chromium	7190/3040
Lead	7420/3040
Total Organic Halogens	5050/9253/9077
Chlorinated Solvent Scan	8010
Chlorinated Solvent Scan	8240
Chlorinated Solvent Scan	8260
Chlorinated Solvent Scan	8270A
PCBs	8080
Flash Point	1010
Solids Content	160.3
pH	9045
Water Content	ASTM D4017

Table 1. USED OIL ANALYTICAL PARAMETERS

<u>FINGERPRINT ANALYSIS</u>	<u>OUT GOING SHIPMENT - To Burner</u>	<u>OUT GOING SHIPMENT - To Marketer or Processor</u>
HALOGEN CONTENT	HALOGEN CONTENT	HALOGEN CONTENT
pH	TOTAL LEAD	FLASH POINT
COLOR	TOTAL CHROMIUM	QUANTITY
ODOR	TOTAL CADMIUM	% WATER
QUANTITY	TOTAL ARSENIC	
FLASH POINT	FLASH POINT	
	QUANTITY	

The Table 1. Out going parameters will be completed on each batch of used oil for shipment off site. At this time, WRI ships used oil to other used oil marketers, and blenders for further processing. The out going parameters identified in Table 1 for these customers will be completed for each shipment and the data recorded on the WRI Retail Oil Sale Tracking Form, Enclosure 3.

If the out going shipment of used oil is being sold directly to an end user or burner of the fuel, then additional analyses are required as identified in Table 1. A full used oil tank will be sampled and analyzed for an out going shipment. Several trucks of used oil will be shipped from the tank until it is empty. No additional used oil will be added to the used oil tank once the sample has been obtained. The chlorinated solvent scans and the Polychlorinated Biphenols (PCBs) will be completed on out going shipments that have greater than 1000-ppm but less than 4000-ppm total organic halogens.

4.5 Halogen Content

The type of information that will be used to determine the halogen content of the used oil will be either process knowledge or analysis for total organic halogens for making a waste determination. Incoming shipments of used oil must be analyzed for halogen content and other fingerprint parameters listed in Table 1. Confirmation of the specific halogenated organic solvent may be confirmed by addition analysis should the rebuttable presumption need to be refuted. Marine bilge water commonly has a high total halogen content due to inorganic salt from seawater. Incoming shipments and each generator's waste oil stream must be analyzed for halogen content and other fingerprint parameters listed in Table 1.

5.0 PROCESSING OR RE-REFINING

Used oil that is processed or re-refined at WRI may be sampled either before or after the processing or re-refining activity. WRI does not currently perform re-refining activities.

6.0 ON SPECIFICATION USED OIL FUEL DETERMINATION

Water Recovery, LLC will use either waste analysis or process knowledge or both to make the used oil for the waste determination. Only three personnel at WRI are authorized to make the waste determination and assign a waste stream approval number to the company waste stream profile. These individuals hold the positions of Plant Manger, Operations Manager and Laboratory Manager.

Incoming shipments and each generator's waste oil must be analyzed for halogen content as part of the fingerprint parameters listed in Table 1.

Used oil meeting the following parameters shall be deemed to be on specification used oil. The total arsenic shall not exceed 5 parts per million (ppm). The total cadmium concentration shall not exceed 2-ppm. The total chromium concentration shall not exceed 10-ppm. The total lead concentration shall not exceed 100-ppm. The total organic halogen concentration shall not exceed 4,000-ppm provided the rebuttable presumption has been refuted for used oil containing greater than 1000-ppm total organic halogens. Used Oil with less than 1000-ppm total organic halogens will be accepted.

**Water Recovery, LLC****Waste Stream Profile**

Date Submitted: _____

Generator Information

Company Name		Contact Name	
Street Address		Phone Number	
City, State ZIP		Fax Number	
Broker Information			

Waste Stream Background Information

Waste Stream Name			
Generation Location			
Generating Process			
Previous Approval Number			
Volume per Load	Gallons in <input type="checkbox"/> Truck <input type="checkbox"/> Drums <input type="checkbox"/> Other		
Delivery Frequency	<input type="checkbox"/> Once <input type="checkbox"/> Loads per <input type="checkbox"/> Week <input type="checkbox"/> Month <input type="checkbox"/> Year		

Waste Classification

Actual % Oil	Range	Classification	Instructions
%	< 20 %	Wastewater	Disregard the Used Oil Characteristics Section of the profile
	20-80 %	Mixed	Fill out the BOTH sections each for the appropriate phase
	> 80 %	Used Oil	Disregard the Wastewater Characteristics Section of the profile

Wastewater Characteristics☐ Analytical data available? (Please attach)

Check if Present	Concentration (mg/L)
Antimony <input type="checkbox"/>	
Arsenic <input type="checkbox"/>	
Barium <input type="checkbox"/>	
Cadmium <input type="checkbox"/>	
Chromium <input type="checkbox"/>	
Cobalt <input type="checkbox"/>	
Copper <input type="checkbox"/>	
Lead <input type="checkbox"/>	
Mercury <input type="checkbox"/>	
Molybdenum <input type="checkbox"/>	
Nickel <input type="checkbox"/>	
Selenium <input type="checkbox"/>	
Silver <input type="checkbox"/>	
Tin <input type="checkbox"/>	
Titanium <input type="checkbox"/>	
Vanadium <input type="checkbox"/>	
Zinc <input type="checkbox"/>	
Oil & Grease <input type="checkbox"/>	
Cyanide <input type="checkbox"/>	
Nitrogen (T) <input type="checkbox"/>	

☐ Analytical data available? (Please attach)

Total Suspended Solids (wt%):					
<input type="checkbox"/> <1	<input type="checkbox"/> 1-5	<input type="checkbox"/> 6-10	<input type="checkbox"/> 11-20	<input type="checkbox"/> >20	
pH Range (<2 or >12.5 is a hazardous waste)					
<input type="checkbox"/> 2-4	<input type="checkbox"/> 5-6	<input type="checkbox"/> 7	<input type="checkbox"/> 8-9	<input type="checkbox"/> 10-12.5	
COD Range (mg/L) (if known)					
<input type="checkbox"/> <100	<input type="checkbox"/> 101-500	<input type="checkbox"/> 501-1000	<input type="checkbox"/> 1001-3000	<input type="checkbox"/> 3001-6000	<input type="checkbox"/> >6000

Organic Pollutants Present	Concentration (mg/L)

Does this waste stream contain any of the following?

☐ PCBs ☐ Sulfides ☐ AFFF ☐ Electro less Plating ☐ EDTA **None**Are multiple layers present? ☐ Yes ☐ No

Describe _____

Describe the odor (if any) _____

Describe the color (if any) _____

**Water Recovery, LLC Waste Stream Profile****Used Oil Characteristics**

☐ Analytical data available? (Please attach)

Characteristic	Actual	Range			
Flash Point (Closed Cup - °F)		<input type="checkbox"/> < 140	<input type="checkbox"/> 141-200	<input type="checkbox"/> > 200	
Total Solids (%)		<input type="checkbox"/> < 1	<input type="checkbox"/> 1-5	<input type="checkbox"/> 6-10	<input type="checkbox"/> 11-20
pH (<2 or >12.5 is hazardous)		<input type="checkbox"/> 2-4	<input type="checkbox"/> 5-6	<input type="checkbox"/> 7	<input type="checkbox"/> 8-9
Viscosity		<input type="checkbox"/> Low	<input type="checkbox"/> Medium	<input type="checkbox"/> High	
Percent Moisture		<input type="checkbox"/> <1	<input type="checkbox"/> 1-5	<input type="checkbox"/> 6-10	<input type="checkbox"/> 11-20
BTU/pound		<input type="checkbox"/> < 2000	<input type="checkbox"/> 2001-6000	<input type="checkbox"/> 6001-10000	<input type="checkbox"/> 10001-16000

Check if Present	Does this waste stream contain any of the following?
Arsenic	<input type="checkbox"/> PCBs <input type="checkbox"/> Sulfides <input type="checkbox"/> AFFF <input type="checkbox"/> Electro less Plating <input type="checkbox"/> EDTA <input type="checkbox"/> None
Cadmium	Are multiple layers present? <input type="checkbox"/> Yes <input type="checkbox"/> No
Chromium	Describe _____
Lead	
Total Organic Halogen	Describe the odor (if any) _____
PCBs	
Other	Describe the color (if any) _____

Additional Information and Comments

Certification

I certify that this waste is not classified as, mixed with, or derived from a hazardous or special waste under the Resource Conservation and Recovery Act (40 CFR Part 261). I further certify that the above information is true and accurate to the best of my knowledge and is based on analysis of a representative sample of the waste in accordance with EPA guidelines and documents, or on my thorough knowledge of the waste and the generating process.

Name: _____

Title: _____

Signature: _____

Date: _____

To be completed by WRI Personnel OnlyApproved? ☐ Yes ☐ No By: _____ Date: _____ Approval Number: _____



Water Recovery, LLC

WRI WASTE TRACKING FORM

TIME IN _____
TIME OUT _____

DATE: _____ 2010 Transporter: _____ Trans Route _____

LOAD # 29621

APPROVAL #:

CUSTOMER #

MANIFEST #

GENERATOR:

WASTE
DESCRIPTION:

VOLUME:

PH: _____ SOLIDS: _____ % OIL: _____ Used Oil? ☐ PCW? ☐

FOR USED OIL OR PCW:

FLASHPOINT: _____ °F (>100 °F required for USED OIL)

TOTAL HALOGENS: _____ ppm (<1000 ppm required)

WRI DELAY?: Y N Reason: _____

Generator DELAY? Y N Reason: _____

METALS SAMPLED?: Y N OFF-LOADED TO TANK # _____

COMMENTS:

PLEASE ENTER ANALYTICAL DATA ON MANIFEST BEFORE PROVIDING COPIES TO
CUSTOMER

TRUCK EMPTY? Driver's initials _____

ENCLOSURE (2)

Retail Oil Sale Tracking Form

Date: _____ / _____ / _____

Sale #: _____

Transporter: _____

Transporter EPA ID#: _____

Customer: _____

Customer EPA ID#: _____

Manifest/BOL # _____

Volume: _____

Off-Loaded from Tank # _____

WRI Data:

Percent Water: _____ % (by distillation unless otherwise noted)

Flashpoint: _____ °F (>140 °F required)

Total Halogens _____ (<1000 ppm required)

Accounting Information:

Customer Percent Water _____ %
Load Volume after deduct _____ gallons
Rate per Gallon _____ \$/gal
Total Load Value _____ \$

COMMENTS:

WATER RECOVERY, LLC

1819 Albert Street
Jacksonville, Florida 32202

USED OIL SLUDGE, RESIDUE AND BY PRODUCT DISPOSAL PLAN

MANAGEMENT PROCEDURE 4300

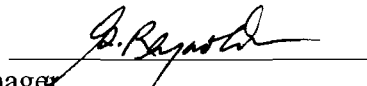
REVISION: 2

<4300TP-4.WPS>

Prepared By:

Gregory G. Reynolds
Vice President and General Manager
Water Recovery, LLC

Signature:



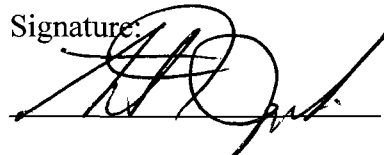
Date:

8/26/10

Approved By:

Steven T. Jenkins
President
Water Recovery, LLC

Signature:



Date:

8/26/10

Table of Contents

	<u>Page Number</u>
1.0 INTRODUCTION [5(b)]	1
2.0 SLUDGE.....	1
3.0 RESIDUALS.....	2
4.0 BY PRODUCTS	2
TABLE 1. USED OIL ANALYTICAL PARAMETERS	1

1.0 INTRODUCTION [5(b)]

This management procedure covers the sludge, residuals and by products requirements of Title 40 Code of Federal Regulations (CFR) Parts 279.10(e) and 279.59. Water Recovery, LLC (WRI) will conduct business in accordance with this sludge, residuals and by products plan when processing used oil. The standard WRI waste profile will be completed for each used oil waste stream generated incidental to used oil processing. The used oil sludge, residuals and by products waste classification will be based upon generator knowledge with supporting analytical information. Both generator knowledge and analytical information may be used in some cases to make a waste stream classification decision. A copy of the WRI waste profile is provided as enclosure (1).

Materials produced from used oil that are burned for energy recovery are regulated as used oil.

Materials that are derived from used oil that are disposed of or used in a manner constituting disposal are not classified as used oil. These materials are solid wastes and are thus subject to the hazardous waste regulations of 40 CFR parts 260 through 266, 268, 270 and 124 if the materials are listed or identified as hazardous wastes.

2.0 SLUDGE

The sludge collected in WRI used oil tanks will be removed at a minimum of every five years. Sludge from tanker trucks will be removed in between jobs as requested by clients. The sludge from client tanker trucks will be placed into 55-gallon containers, lined roll off boxes that are covered or vacuum boxes. The sludge from the used oil tanks will be placed into either 55-gallon containers or lined roll off boxes that are covered. The used oil sludge will be analyzed for the Table 1 parameters to make a waste determination in accordance with 40 CFR Part 262.

**Table 1. USED OIL SLUDGE, RESIDUALS AND BY PRODUCTS
ANALYTICAL PARAMETERS**

<u>ANALYTICAL PARAMETERS (EPA METHOD NUMBER)</u>
TCLP METALS (1311/6010B or 7470)
TCLP VOLATILES (1311/5030/8260)
TCLP SEMIVOLATILES (1311/3510/8270)

The used oil sludge will be disposed of as a hazardous waste or a nonhazardous waste depending on the results of the waste determination.

3.0 RESIDUALS

The residuals collected in the WRI used oil tanks will be removed at a minimum of every five years. Residuals from the tanker trucks will be removed in between jobs as requested by clients. The residuals from tanker trucks will be placed into 55-gallon containers or lined roll off boxes with a cover. The residuals from the used oil tanks will be placed into either 55-gallon containers, lined roll off boxes with covers, or vacuum boxes. The used oil residuals will be analyzed for the Table 1 parameters to make a waste determination in accordance with 40 CFR Part 262. WRI used oil sludge and residuals may be combined as a single waste stream.

The used oil residuals will be disposed of as a hazardous waste or a nonhazardous waste depending on the results of the waste determination.

4.0 BY PRODUCTS

The by products collected in the WRI used oil tanks will be removed at a minimum of every five years. By products from the tanker trucks will be removed in between jobs. The by products from the tanker trucks will be placed into 55-gallon containers or lined roll off boxes with covers. The by products from the used oil tanks will be placed into either 55-gallon containers or lined roll off boxes with covers. The used oil by products will be analyzed for the Table 1 parameters to make a waste determination in accordance with 40 CFR Part 262. WRI used oil sludge, residuals and by products may be combined as a single waste stream.

The used oil by products will be disposed of as a hazardous waste or a nonhazardous waste depending on the results of the waste determination.

WATER RECOVERY, LLC

1819 Albert Street
Jacksonville, Florida 32202

USED OIL TRACKING PLAN

MANAGEMENT PROCEDURE 4400

REVISION: 2

<4400TP-4.WPS>

Prepared By:

Gregory G. Reynolds
Vice President and General Manager
Water Recovery, LLC

Signature:



Date:

8/26/10

Approved By:

Steven T. Jenkins
President
Water Recovery, LLC

Signature:



Date:

8/26/10

Table of Contents

Page Number

1.0 INTRODUCTION [5(C)]1

2.0 DESCRIPTION.....1

ENCLOSURE (1) WRI WASTE TRACKING FORM

ENCLOSURE (2) WRI RETAIL OIL SALE TRACKING FORM

1.0 INTRODUCTION [5(C)]

This management procedure covers the tracking requirements of Title 40 Code of Federal Regulations (CFR) Parts 279.56. Water Recovery, LLC (WRI) will conduct business in accordance with this tracking plan when shipping or receiving used oil.

A copy of the WRI Incoming Waste Tracking Form is provided as enclosure (1). The WRI Waste Tracking Form connects the used oil from pre-approval (WRI Waste Profile Form), through approved acceptance. The Waste Tracking Form connects the delivery manifest or bill of lading, the generator EPA identification, the Transporter EPA identification, to the WRI invoice. The data from each WRI Waste Tracking Form is recorded into an electronic database file on the company server. This creates a secure backup of the paper copies of the used oil tracking information, which is also searchable.

The WRI Outgoing Retail Oil Sale Tracking Form is provided as enclosure (2). The WRI Retail Oil Sale Tracking Form connects the shipping manifest or bill of lading, the receiving party EPA identification, the Transporter EPA identification, to the WRI invoice. The data from each WRI Retail Oil Sale Tracking Form is recorded into an electronic database file on the company server. This creates a secure backup of the paper copies of the used oil tracking information, which is also searchable.

2.0 DESCRIPTION

The WRI Waste Tracking Forms, WRI Retail Oil Sale Tracking Forms, and copies of the incoming and outgoing shipment manifests or bill of lading are retained for at least three years. These documents include the information as stated in 40 CFR Part 279.56. The WRI used oil shipment forms are provided as enclosures (1) and (2). These forms contain the required regulatory information in accordance with 40 CFR Part 279.56.

The WRI used oil processing facility will keep a record of each incoming used oil shipment accepted for processing. The record will be the WRI Waste Tracking Form. This form along with the receiving manifest or bill of lading contains the following information:

- Name and address of the transporter who delivered the used oil shipment.
- Name and address of the generator or processor/re-refiner from whom the used oil was sent for processing.
- The EPA identification number of the transporter who delivered the used oil.
- The EPA identification number of the generator from whom the used oil was sent.
- The quantity of used oil accepted and the date of acceptance.

The WRI used oil processing facility will keep a record of each outgoing used oil shipment that is sent to a used oil burner, processor/re-refiner or disposal facility. The record will be the WRI Retail Oil Sale Tracking Form. This form along with the shipping manifest or bill of lading contains the following information:

- Name and address of the transporter who delivered the used oil shipment.
- Name and address of the used oil burner, processor/re-refiner or disposal facility who will receive the used oil.
- The EPA identification number of the transporter who will deliver the used oil.
- The EPA identification number of the used oil burner, processor/re-refiner, or disposal facility who will receive the used oil.
- The quantity of used oil shipped and the date of shipment.



Water Recovery, LLC

WRI WASTE TRACKING FORM

TIME IN _____
TIME OUT _____

DATE: _____ 2010 Transporter: _____ Trans Route _____

LOAD # 29621

APPROVAL #:

CUSTOMER #

MANIFEST #

GENERATOR:

WASTE
DESCRIPTION:

VOLUME:

PH: SOLIDS: % OIL: Used Oil? ☐ PCW? ☐

FOR USED OIL OR PCW:

FLASHPOINT: _____ °F (>100 °F required for USED OIL)

TOTAL HALOGENS: _____ ppm (<1000 ppm required)

WRI DELAY?: Y N Reason: _____

Generator DELAY? Y N Reason: _____

METALS SAMPLED?: Y N OFF-LOADED TO TANK #

COMMENTS:

PLEASE ENTER ANALYTICAL DATA ON MANIFEST BEFORE PROVIDING COPIES TO
CUSTOMER

TRUCK EMPTY? Driver's initials _____

ENCLOSURE (1)



Water Recovery, LLC

Retail Oil Sale Tracking Form

Date: / /

Sale #: _____

Transporter: _____

Transporter EPA ID#: _____

Customer: _____

Customer EPA ID#: _____

Manifest/BOL # _____

Volume: _____

Off-Loaded from Tank # _____

WRI Data:

Percent Water: _____ % (by distillation unless otherwise noted)

Flashpoint: _____ °F (>140 °F required)

Total Halogens _____ (<1000 ppm required)

Accounting Information:

Customer Percent Water _____ %
Load Volume after deduct _____ gallons
Rate per Gallon _____ \$/gal
Total Load Value _____ \$

COMMENTS:

ENCLOSURE (2)

WATER RECOVERY, LLC

1819B Albert Street
Jacksonville, Florida 32202

SPILL PREVENTION, CONTROL AND COUNTERMEASURE PLAN WITH CONTINGENCY PLANNING AND EMERGENCY PROCEDURES

MANAGEMENT PROCEDURE 4600

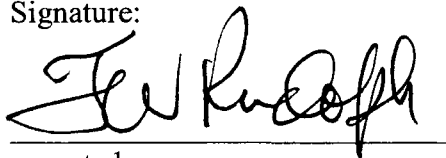
REVISION: 2

<4600TP-3668-4-1-1-1.DOC>

Prepared By:

Timothy Rudolph, P.E.
Environmental Engineer
ENVIRONEERING, Incorporated

Signature:



Date:

8/5/10

Approved By:

Steve Jenkins
President
Water Recovery, LLC

Signature:



Date:

8/5/2010

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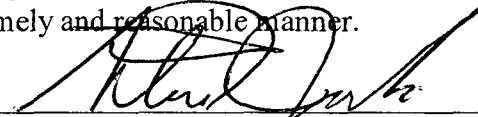
ATTACHMENT (#9)

WATER RECOVERY, INC.
1819 B Albert Street
Jacksonville, FL 32202

MANAGEMENT APPROVAL

The undersigned has the authority to commit all necessary resources to implement this SPCC Plan in a timely and reasonable manner.

President:



Steve Jenkins

Date

8/5/2010

CERTIFICATION

I hereby certify that I have examined the facility, and familiar with the provisions of 40 CFR Part 112, attest that this SPCC Plan has been prepared in accordance with good engineering practice and conforms to Part 112.

Timothy W. Rudolph, P.E.



Signature of Registered Professional Engineer

(Seal)

**Date: January 16, 2002
August 5, 2010**

Registration No. 39617 State of Florida

**Original plan preparation
Update #1 Revision #2
Update #2
Update #3**

**January 16, 2002
August 5, 2010**

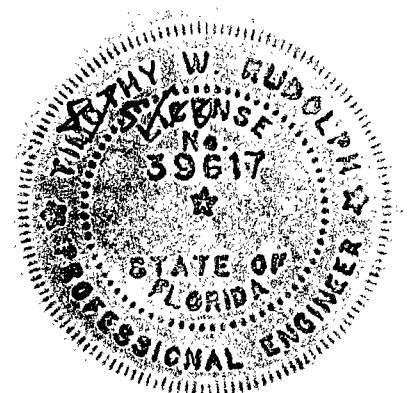


TABLE OF CONTENTS

	<u>PAGE</u>
1.0 INTRODUCTION [7]/[112.3 (a), (b)&(c)] [112.7].....	1
1.1 Certification of SPCC Plan [112.3(d)]	4
1.2 Availability of SPCC Plan [112.3(e)] & [7(i)]	4
1.3 Amendment of SPCC Plan by Regional Administrator [112.4]	5
1.4 Amendment of SPCC Plan by Owner or Operator[112.5(a)] & [7(j)]	5
1.5 Review and Evaluation of SPCC Plan [112.5(b)&(c)]	6
 2.0 SPILL PREVENTION MEASURES	6
2.1 Spill Prevention Responsibility.....	6
2.2 Spill Prevention Measures taken during Transfer of Petroleum	6
2.3 Inspection [112.7(vi)]	8
2.3.1 Inspection Responsibility.....	8
2.3.2 Inspection of Storage Tanks.....	8
2.3.3 Inspection of Piping	8
2.3.4 Inspection of Secondary Containment Areas	8
2.3.5 Inspection of Petroleum Transport Vehicles.....	9
2.4 Training of Facility Operation Personnel [122.7(e)(10)(i)(ii)(iii)]	9
2.4.1 Training Records.....	9
2.4.2 Training Responsibility.....	9
2.4.3 Training Briefings	9
2.5 Facility Security [112.7(9)]	10
2.5.1 Tank Master Flow and Drain Valves [112.7(e)(9)(ii)].....	10
2.5.2 Pump(s) [112.7(e)(9)(iii)]	10
2.5.3 Fuel/oil Transfer Connections [112.7(e)(9)(iv)]	10
2.5.4 Facility Lighting [112.7(e)(9)(v)]	10
2.5.5 Facility Fencing [112.7(e)(9)(i)]	11
2.6 Spill Team Responsibilities and Qualification	11
2.6.1 Spill Team Coordinator.....	11
2.6.1.1 STC Responsibilities.....	11

TABLE OF CONTENTS

(continued)

	<u>PAGE</u>
2.6.1.2 STC Qualifications.....	12
2.6.2 Spill Team Members.....	12
2.6.2.1 STM Responsibilities.....	12
2.6.2.2 STM Qualifications.....	13
3.0 PETROLEUM STORAGE AREA.....	13
3.1 Possible Spill Pathways [112.7(b)]	14
3.2 Contingencies [7(a)]	15
3.3 Past Spill Events [112.7(a)]	15
4.0 SPILL CONTROL MEASURES.....	15
4.1 Spill Response Material	16
4.2 Secondary Containment [112.7(e)(2)(i)&(ii)].....	16
4.2.1 Maintenance of Secondary Containment Areas	16
4.2.2 Removal of Water from Secondary Containment [112.7(e)(2)(A-D)]	16
4.3 Fuel Transfer Area	17
4.4 Chemical Storage Area	18
5.0 SPILL COUNTERMEASURES	18
5.1 Notification Procedure	18
A. Corporate Notification	18
B. Emergency Personnel Notification.....	19
C. Regulatory Agency Notification.....	19
D. Petroleum Spill Clean-up Contractors	20
E. Petroleum Spill/Environmental Engineers	21
5.2 Procedures for Responding to a Spill of Petroleum.....	21
5.2.1 Spill of Petroleum Within Secondary Containment.....	21
5.2.2 Spill From a Leak in the Piping	22
5.2.3 Spill Through Wall	22
5.2.4 Petroleum Spill Entering a Body of Water or Storm Sewer	22
5.3 Fire Procedure [7(a)]	23
5.4 Explosion Procedure [7(a)]	24
5.5 Sudden Release Procedure [7(a)]	26

TABLE OF CONTENTS

(continued)

	<u>PAGE</u>
6.0 EMERGENCY RESPONSE ARRANGEMENTS [7(b)]	27
7.0 SPILL RESPONSE COORDINATORS [7(c)]	28
8.0 SRC PROCEDURES [7(d)]	28
9.0 EMERGENCY RESPONSE EQUIPMENT [7(e)]	29
10.0 EMERGENCY STORAGE [7(f)]	30
11.0 EQUIPMENT DECONTAMINATION [7(g)]	31
12.0 EVACUATION PLAN [7(h)]	31
13.0 REPORTABLE INCIDENTS [7(k)]	31

APPENDICES

Appendix A	Drawings	33
	Drawing No. 4034-1 Emergency Evacuation Routes	35
	Drawing No. 4034-2 WRI Used Oil Facility Site Plan	36
	Drawing No. 4034-3 Hazardous Material Storage Location.....	37
	Drawing No. 4034-4 Hazardous Material Storage Location.....	38
	Drawing No. 4034-5 Closure Sampling Locations	39
	Drawing No. 4034-6 Material and Waste Traffic Pattern.....	40
	Drawing No. 4034-7 Used Oil Processing Area	41
	Drawing No. 4034-8 Secondary Containment Calculation Area.....	42
Appendix B	Petroleum Spill Report Record	43
Appendix C	Tank System Visual Inspection Checklist.....	46
	Tank System Activity Log	49
Appendix D	Secondary Containment Fluid Removal Record.....	50
Appendix E	Record of Revision to SPCC Plan	52
Appendix F	Facility Operation Personnel Training Record	55
Appendix G	Record of SPCC Plan Review.....	58

List of Tables

Table 3.1	Fuel and Used Oil System Description and Capacities.....	13
Table 3.2	Tank Identification and Descriptions	14
Table 9.1	Used Oil Spill Kit Inventory	30

1.0 INTRODUCTION [7]/[112.3 (a), (b)&(c)] [112.7]

This management procedure covers the contingency plan and emergency procedures of Title 40 Code of Federal Regulations (CFR) Parts 279.52(b) and the Spill Prevention, Control and Countermeasure (SPCC) Plan requirements as specified under Title 40 Part 112 of the Code of Federal Regulations (40 CFR Part 112). Water Recovery, LLC (WRI) will conduct business in accordance with this contingency plan.

Water Recovery, LLC maintains and operates the used oil tanks under this contingency plan and emergency procedures to minimize the possibility of a fire, explosion or any unplanned sudden or non-sudden release of used oil to air, soil, surface water or groundwater that could threaten human health or the environment.

The provisions of this plan must be carried out immediately whenever there is a fire, explosion or release of petroleum that could threaten human health or the environment. The purpose of the facility is to store diesel fuel, gasoline, used oil, industrial wastewater and petroleum contact water and to process used oil. The facility also collects used oil and used oil filters from the maintenance of vehicles. A facility site plan is located in Appendix A.

The Federal Water Pollution Control Act (FWPCA) Amendments of 1972 require the administrator of the Environmental Protection Agency (EPA) to prevent, reduce or eliminate pollution of the navigable waters of the United States from non-transportation related (NTR) facilities. Hence, on December 11, 1973, the EPA published regulations for the prevention of pollution of these waters by oil emanating from non-transportation related on-shore and off-shore facilities which store, use or transfer oil. The regulations are identified as Title 40 of the Code of Federal Regulations Part 112 (40 CFR Part 112) under the title "Oil Pollution Prevention" and became effective on January 10, 1974.

The regulations required, among other things, are the preparation and implementation of a Spill Prevention, Control and Countermeasure (SPCC) Plan for all applicable non-transportation related facilities, which could reasonably be expected to discharge a harmful quantity of oil into or upon navigable waters of the United States or their adjoining shorelines.

The purpose of the SPCC Plan includes the means to identify and describe the potential sources of spills, the facilities and procedures utilized to prevent a spill and the control and cleanup procedures used by facility personnel. Proper implementation of the plan will reduce the spill potential and minimize the adverse consequences a spill might have on the environment.

The WRI used oil processing facility has several single wall steel tanks with concrete secondary containment or concrete masonry unit walls filled with concrete and sealed with an epoxy paint system. Diesel fuel, gasoline, used oil, marine diesel and light ends are stored in

above ground tanks. A work area is provided in the secondary containment area for used oil and used oil filter collection and storage.

WRI is required to prepare and implement a Spill Prevention, Control and Countermeasure (SPCC) Plan as specified under Title 40 Part 112 of the Code of Federal Regulations (40 CFR Part 112) based on the storage capacity of the used oil processing facility. The purpose of this Plan is to establish procedures, measures and other requirements intended to prevent the discharge of petroleum into navigable waters of the United States. For the purposes of environmental regulation, waters of Florida are considered to be navigable.

This Plan is divided into thirteen sections. The facility policies for maintaining this SPCC Plan and preventing and controlling discharges of petroleum products is outlined in sections 1, 2 and 3. Sections 4 and 5 describe the petroleum storage area at the facility and provide procedures for recovery, response, clean up and disposal of petroleum spills. Sections 6 through 13 detail the emergency response resource information.

This SPCC Plan has the full approval of management at a level with authority to commit the necessary resources for its implementation. The Spill Response Coordinator is responsible for implementing and maintaining this SPCC Plan. This SPCC Plan has been prepared in accordance with good engineering practice. Currently no SPCC items are scheduled to be installed by WRI.

A SPCC Plan is required to be prepared within six months after a facility becomes operational. The SPCC Plan must be implemented within one year after the facility became operational. The WRI used oil facility became operational in the second quarter of 2001. The implementation period for this SPCC Plan was June of 2002.

The facility site plan, evacuation plan and hazardous material storage locations are provided in Appendix A along with the other facility drawings.

Water Recovery, LLC (WRI) is an industrial wastewater treatment and used oil-processing facility located at 1819 B Albert Street, Jacksonville, Florida. The facility is situated on approximately 1.5 acres near downtown Jacksonville. It is immediately south of the Matthews Bridge just off Talleyrand Avenue and approximately 700 feet west of the St. Johns River. The plane of the terrain at the facility is relatively flat and slopes slightly to the east towards the Bryan Street boundary.

The facility is normally operated eight hours per day, five days per week. However, there are frequent after hour and weekend operations depending upon workload.

Water Recovery, LLC engages in the treatment of non-hazardous industrial wastewaters and used oil recycling from various commercial and industrial sources. The major sources of industrial wastewaters and recyclable oil are as follows:

- Waste water from tank cleaning and tank bottoms from petroleum storage facilities,
- Oily waste water from pits, ponds and lagoons associated with manufacturing operations;
- Industrial waste oil lubricants, cooling oils and wash waters;
- Petroleum contact water from petroleum storage facilities; and
- Oily bilge slops and wash waters from the shipping industry.

The wastewater treatment process consists of physical, chemical and mechanical treatment. Treated wastewater is discharged to the JEA Publicly Owned Treatment Works (Buckman Street Facility) under JEA Permit No. 099.

Water Recovery, LLC has registered the regulated above ground storage tanks with the Florida Department of Environmental Protection (DEP) and has the DEP tank facility number 9803098. The facility has the used oil processing permit number 79677HO-06. Incoming liquids are analyzed prior to acceptance into the facility. Once accepted, the oil is segregated, stored and treated. The treatment process consists of physical and chemical separation processes. On specification oil is sold to marketers who further blend used oil for energy recovery.

The facility is segregated into two areas with the oil treatment and storage occurring on the north side of the receiving dock area and the wastewater treatment occurring on the south side. The site plan drawing included in Appendix A outlines the layout of the facility. Storage and treatment activities occur in above ground tanks.

The tanks designated as wastewater treatment and storage tanks comprise a total volume of approximately 148,000 gallons. The oil storage and treatment tanks have an approximate total capacity of 230,750 gallons. A small quantity of treatment chemicals are maintained on site to meet on going treatment needs.

Water Recovery, LLC does not have any produced water containers or tanks present at the facility.

The WRI tanks are constructed with steel, which is compatible with the petroleum products stored at the facility. Steel is compatible with diesel fuel, marine diesel, used oil, gasoline, product oil and petroleum contact water.

The steel tanks are painted and maintained in a professional manner to minimize corrosion. The tanks are inspected on a routine basis in accordance with this Plan to ensure compliance with 40 CFR Part 112. The used oil tanks are currently painted black and the industrial wastewater tanks are painted green.

1.1 CERTIFICATION OF SPCC PLAN [112.3(d)]

This SPCC Plan has been reviewed and certified by a State of Florida Registered Professional Engineer. Such certification in no way relieves WRI of the duty to fully implement and maintain this SPCC Plan.

1.2 AVAILABILITY OF SPCC PLAN [112.3(e)] & [7(i)]

A complete copy of this SPCC Plan is maintained in the main building of the facility in the environmental department. The location of the office building is indicated on the Facility Site Plan in Appendix A. The SPCC Plan will be made available for review by the Florida Department of Environmental Protection (FDEP) or by the Environmental Protection Agency (EPA) immediately upon request during normal working hours.

Another copy of the plan is located at the facility laboratory. Revisions to the plan must be made to all copies of the plan.

A copy of this plan will be maintained at WRI in the Vice President Office and in the Laboratory. A copy of this plan has also been sent to the local emergency response authorities identified in the preparedness and prevention plan. This plan has been sent to the Jacksonville Fire Department, Jacksonville Police Department and Baptist Medical Center. Copies of the Contingency Plan and Emergency Procedures have been sent to:

Fire Dept. & Fire Rescue:.....Jacksonville Fire Department

Emergency Phone:911

Business Phone:(904) 630-0529

Police Department:Jacksonville Police Department

Emergency Phone:911

Business Phone:(904) 630-7600

Community Hospital:Baptist Medical Center

Emergency Phone:(904) 202-2046

Business Phone:(904) 202-2000

1.3 AMENDMENT OF SPCC PLAN BY REGIONAL ADMINISTRATOR [112.4]

The facility will submit a SPCC Plan amendment to the EPA Regional Administrator and Florida Department of Environmental Protection if the more than 1,000 gallons is discharged into navigable waters or if the facility has had two reportable spills within a twelve-month period. The information submitted will be as stated in 40 CFR Part 122.4.

If a spill event occurs resulting in the release of greater than 1,000 gallons to a navigable water or adjoining shoreline in a single spill or event or discharge of harmful quantities to navigable waters or adjoining shorelines occurs, a written report is required to be submitted to the Regional Administrator within 60 days (see Section 5.1, Notification Procedure). Upon receipt of this report the Regional Administrator may require the owner or operator to amend the SPCC Plan, if it is found that the Plan does not meet the requirements of Part 112 or that an amendment is necessary to prevent and contain discharges of oil from the facility. When the Regional Administrator proposes to require an amendment, the facility operator shall be notified with the specific terms. The facility owner or operator shall respond within 30 days of receipt of notice and submit written information regarding the amendment notice.

1.4 AMENDMENT OF SPCC PLAN BY OWNER OR OPERATOR [112.5(a)] & [7(j)]

WRI will amend this plan within six months when there is a change in design, operation or maintenance that affects the facility's potential to discharge petroleum. Changes requiring amendment of the SPCC Plan include, but are not limited to replacement, relocation or addition of tanks; replacement, relocation or modification of the piping system; alteration of secondary containment structures; or revision of any of the standard operation or maintenance procedures. Records of revisions or amendments to the Plan will be noted in Appendix E of this Plan. Revisions except those made to the emergency contact list will be reviewed and certified by a State of Florida Registered Professional Engineer.

This SPCC Plan will be reviewed every year, as required by law, or when engineering or operational changes occur. It will be updated regularly with regard to names and telephone numbers. If significant changes in the facility are made that substantially affect this SPCC Plan, then this Plan should be updated as soon as practical or within six months. Minor changes at the facility affecting this Plan should be placed into a revision of this Plan, which should be incorporated within six months. Any plan

amendment will be written and certified by a State of Florida Registered Professional Engineer.

The Spill Team Coordinator or his designated representative will provide input to the WRI Florida Registered Professional Engineer to revise this Contingency Plan in accordance with experience acquired during each emergency situation and will send copies of the revisions to each holder of the original plan including the local hospital, fire department and police department.

The Contingency Plan will be revised when regulations require a change for compliance or when process changes need to be made to the existing facility.

This Plan will be reviewed once per year at a minimum.

1.5 REVIEW AND EVALUATION OF SPCC PLAN [112.5(b) & (c)]

WRI or a Registered Professional Engineer will review and evaluate the facility and this SPCC Plan at least once every year. This SPCC Plan must be re-certified by a Professional Engineer within six months after facility modification and subsequent changes are to be made to this Plan, except for changes made to the emergency contact list.

A complete review on this SPCC Plan will be completed every five (5) years and will be documented on the Appendix G form.

2.0 SPILL PREVENTION MEASURES

The following spill prevention methods and procedures have been implemented by WRI.

2.1 SPILL PREVENTION RESPONSIBILITY

The Spill Response Coordinator at this facility is the WRI President, Mr. Steve Jenkins, (904) 475-9320. This person is responsible for petroleum spill prevention at the facility.

2.2 SPILL PREVENTION MEASURES TAKEN DURING TRANSFER OF PETROLEUM

Diesel fuel, gasoline, used oil, petroleum contact water and lube oil are transferred to the facility by registered commercial firms experienced in transportation and handling

of petroleum products. Procedures used are required to meet Department of Transportation Standards. In general, these requirements include:

1. Qualified trucking personnel and WRI personnel must be present during the petroleum transfer operation.
2. WRI personnel are responsible for identifying and explaining the operation of the system to petroleum delivery personnel.
3. Drip pans shall be installed at every temporary connection point. The drip pans will be marked with the words used oil and will be emptied on a regular basis.
4. Vehicle engine must be stopped during the petroleum transferring process, unless the vehicle engine is required for pumping the petroleum. If the engine is required, verify that the vehicle wheels are chocked, the emergency brake is set and cones are in place around the delivery vehicle.
5. Vehicle hand brakes must be fully engaged during the petroleum transferring process.
6. Level gauge on tank is to be continuously monitored during the petroleum transferring process.
7. No smoking within 25 feet of the tank or vehicle area.
8. No fire or open flames within 25 feet of the tank or vehicle area.
9. Warning signs must be placed to prevent departure of the vehicle prior to completing petroleum transfer operations and removal of transfer lines.
10. Prior to filling and prior to vehicle departure, the drain and all outlets of the vehicle must be closely examined for leaks and tightened, repaired or replaced as necessary to prevent leakage while in transit.
11. All equipment must be grounded during fueling operations to prevent sparking.
12. Petroleum delivered to this site must be made using a dispensing hose with an adapter to mate with the inlet piping cam lock. The person delivering the petroleum is responsible for insuring that the contents of the truck are delivered to the tank.

Drip pans are to be used throughout the transfer process to prevent product from coming into contact with the secondary containment during line connections and disconnections.

The secondary containment system at the facility has sufficient capacity to contain the largest compartment on the tanker trucks picking up and delivering to the facility.

A warning sign will be provided in the loading/unloading area to prevent vehicular departure before complete disconnection of transfer lines is finished.

An interlocked warning light or physical barrier system, wheel chocks or vehicle break interlock system may be used as an option to the warning sign.

Vehicular traffic granted entry into the facility will be warned not to endanger above ground petroleum piping by appropriate signage at the front gate.

2.3 INSPECTIONS [112.7(vi)]

The facility shall be inspected at least monthly, to assure timely discovery and correction of potential failures or spills. The Tank System Visual Inspection Checklist is to be used to document the inspections. A copy is included in Appendix C of this plan. This documentation also serves as a checklist to assure that equipment is utilized and operations are performed in a safe and effective manner. Corrective action is to be taken upon discovery of any leaks or significant deterioration. The inspection records are to be maintained at the facility for the life of the tank system.

2.3.1 Inspection Responsibility

The Spill Response Coordinator has the responsibility of ensuring that all documentation relating to the SPCC Plan is maintained and kept current. The Coordinator may designate qualified personnel at the facility to perform the inspections.

2.3.2 Inspection of Storage Tanks

The exterior steel wall of the tanks shall be inspected monthly for signs of deterioration, including dents, pits, cracks, rust or other damage. Level gauges if installed shall be inspected monthly for signs of deterioration and accuracy.

2.3.3 Inspection of Piping

The interior and exterior piping, including joints, flanges, flexible connectors, valves, pipe supports as well as hoses and connections at the pumps shall be inspected monthly for signs of deterioration or leaks that may cause a spill of the contents. Inspection shall include piping between the tanks, pumps and the transfer area. Periodic pressure testing may be conducted for piping areas that are suspected of potential failure.

2.3.4 Inspection of Secondary Containment Areas

The secondary containment areas are visually inspected on a monthly basis for signs of deterioration and accumulation of fluid or other debris. These areas include the Tank Farm, Loading/Unloading Area and Container Storage Area. Removal of petroleum or water from secondary containment areas is described

in Sections 4.2.2 of this Plan. The Secondary containment is made from concrete and will be inspected for cracks, spalling and leaks.

2.3.5 Inspection of Petroleum Transport Vehicles

Vehicles used to transport petroleum will be visually inspected for leakage prior to loading or unloading of petroleum. The unloading area will be inspected for accumulations of petroleum prior to arrival of vehicle and after departure. Petroleum that is visible on the surface around the transfer operation will be cleaned up.

2.4 TRAINING OF FACILITY OPERATING PERSONNEL [122.7(e)(10)(i)(ii)(iii)]

Facility operating personnel are instructed on applicable pollution control laws, rules, and regulations and the operation and maintenance of equipment to prevent discharges of petroleum.

2.4.1 Training Records

The Spill Response Coordinator is responsible for maintaining up-to-date records of operating personnel training. Training of operation personnel will be noted on the Facility Operating Personnel Training Record located in Appendix F of this Plan. Training records are maintained for the duration of operating personnel employment.

2.4.2 Training Responsibility

The Spill Response Coordinator is responsible for ensuring that all facility-operating personnel are trained according to Section 2.4 of this Plan. New personnel must be trained prior to any activities involving petroleum transfer.

2.4.3 Training Briefings

The Spill Response Coordinator has delegated the scheduling and annual spill prevention training to the Spill Team Coordinator (STC). The training will be for operating personnel to assure adequate understanding of this SPCC Plan. The training briefing will highlight and describe known spill events of failures, malfunctioning components and recently developed precautionary measures.

Facility personnel involved in the transfer of petroleum as described in this Plan shall be instructed in the procedures to follow as written in this Plan. Facility personnel will be updated with any new information regarding the procedures or materials as outlined in this Plan. In addition to the procedures outlined in the Plan, the training will include an appropriate discussion of environmental rules, regulations, security and safety practices. Also, causes of spill events and new spill prevention and abatement technology will be discussed. Initial training and annual reviews of the required training will be conducted by the STC or his designee.

2.5 FACILITY SECURITY [112.7(9)]

The following security precautions have been implemented by WRI. A WRI employee is present at the facility during the hours of operation.

2.5.1 Tank Master Flow and Drain Valves [112.7(e)(9)(ii)]

Drain valves, and any other valves or openings permitting direct access to or outflow of a tank's contents are locked in the closed position when not in use.

2.5.2 Pump(s) [112.7(e)(9)(iii)]

The pumps are located in the Tank Farm or the Used Oil Processing Area and are accessible only to authorized personnel. Starter controls for pumps are accessible to authorized personnel only. The starter controls will be locked in the off position when the facility is closed.

2.5.3 Fuel/oil Transfer Connections [112.7(e)(9)(iv)]

Fuel/oil transfer (Fill) connections are securely capped or blank flanged and valves are padlocked in the closed position when not in use or when in standby service for an extended time.

2.5.4 Facility Lighting [112.7(e)(9)(v)]

The facility is adequately lighted to allow for the discovery of spills occurring during hours of darkness and to deter acts of vandalism. The facility has sufficient light to allow the operation of the equipment, pumps and treatment units at night. The facility is adequately illuminated for operations to be conducted safely at night.

2.5.5 Facility Fencing [112.7(e)(9)(i)]

The facility is completely surrounded by chain-link fencing with posted signs prohibiting entry of unauthorized personnel. The fuel/oil tanks and pumps are surrounded by a perimeter containment wall. Entrance to the facility is restricted to authorized personnel only. Entrance gates are locked or guarded when the plant is unattended or not in operation.

2.6 Spill Team Responsibility and Qualifications

It is the responsibility of the Vice President to act as the facility Spill Team Coordinator and to become familiar with the contents of this SPCC Plan. The Spill Team Coordinator shall organize and maintain a Spill Control Team.

2.6.1 Spill Team Coordinator

The Spill Team Coordinator will be the Vice President or, in his absence, the Production Manager. The Spill Team Coordinator will be notified immediately at the time the spill is discovered. The Spill Team Coordinator (STC) will go directly to the spill. The STC will provide direction for the Spill Team Members and manage the activities required to control the spill and abate the contamination. The STC must use the means necessary (engineering, maintenance, contractors or consultants) to stop, contain, clean up and remove petroleum products.

2.6.1.1 STC Responsibilities

The STC has the following responsibilities:

- Assure preparation and update the SPCC Plan as required by 40 CFR Part 112. This plan will be updated every year or when a change occurs in the facility.
- Respond to spills, evaluate the environmental impact and advise the Management Personnel.
- Communicate with regulatory agencies.
- Develop new countermeasures and initiate new methods to further improve the spill prevention plan.
- Prepare and submit the required reports.
- Conduct periodic training sessions to ensure facility personnel are familiar with the SPCC Plan.
- Conduct a monthly inspection of the facility to ensure that all parts of the plan are functional.

- Accompany regulatory officials on inspection tours.
- Inform management of any exceptions or deficiencies in the SPCC Plan or facilities.
- Maintain necessary inventory of spill control equipment and supplies at the facility site.
- Maintain a current list of contractors available to aid in the control, clean up and disposal of spills.
- If the facility has discharged more than 1,000 gallons of oil in a single spill or a harmful quantity of oil (as defined in the regulations) in two spill events within a twelve (12) month period, the Spill Team Coordinator (STC) is responsible for submitting a report containing information, as designated in the regulations, to the EPA Regional Administrator and the appropriate State agencies. (Section 5.3.2 details the requirements of the written report).

2.6.1.2 STC Qualifications

The STC must meet the following minimum qualification:

- Must be thoroughly familiar with the Sections of this Plan, the operations and activities at the facility, the location and characteristics of the materials handled, the location of records within the facility and the facility layout.
- The STC has the authority to commit the resources needed to carry out this Plan.
- The STC will be trained in the use of the emergency control and safety equipment.

2.6.2 Spill Team Members

The Spill Team Members (STM) will be trained in the procedures for handling the spilled petroleum. Plant employees will have the appropriate Emergency Response training as outlined in 29 CFR 1910.120 or as required under the OSHA Hazard Communication Standard.

2.6.2.1 STM Responsibilities

The STM members have the following responsibilities:

- Leave normal assigned job immediately upon alert of a spill and proceed to the spill location and take up assigned position.

- Using the appropriate WRI equipment as needed and available, assist in stopping, containing, removing and disposing of the spilled material as directed.
- Maintain periodic training to remain current on spill procedures, areas, equipment and methods.

2.6.2.2 STM Qualifications

The STM members will have the following minimum qualifications:

- Must be trained in response procedures and in the use of the spill response equipment and safety equipment.
- Must be familiar with the potential dangers or hazards of the material spilled.
- Must be familiar with each potential spill area and as described in this Plan.
- Must be trained and be familiar with the contents and implementation of this SPCC Plan.
- Must be healthy enough to perform their duties under this plan.

3.0 PETROLEUM STORAGE AREA

The Table 3.1 information provides the basic system description for the Water Recovery, LLC Fuel and Lube Oil Storage Systems. The petroleum piping at the facility is above ground and is located within secondary containment or is double walled.

Table 3.1 Fuel and Lube Oil System Description and Capacities.

<u>ITEM</u>	<u>DESCRIPTION</u>
Capacity	500-30,000 Gallon
Purpose	Storage of diesel fuel, gasoline, marine diesel, petroleum product, petroleum contact water & used oil.
Fuel Lines	3/4-3" Steel Piping Above Ground
Overfill Protection	Secondary Containment
Leak Detection	Visual

The tank number, description of tank contents and tank capacity are provided in Table 3.2. The industrial wastewater processing tanks are not included in the Table 3.2 since they do not

store petroleum products. The industrial water pretreatment facility is permitted and regulated by the Jacksonville Electric Authority (JEA). The contents of the industrial wastewater tanks are deemed to be that of water. The amount of petroleum in the industrial wastewater is considered to be de minimus in nature. The industrial wastewater normally contains a small amount of dissolved oil.

Table 3.2 Tank Identification and Descriptions

TANK ID NO.	CAPACITY (IN GALLONS)	DESCRIPTION
1-P	23,750	Receiving Waste Oil Storage Tank
2-P	23,750	Insulated Oil Treatment Tank
3-P	23,750	Receiving Waste Oil Storage Tank
4-P	20,000	Receiving Waste Oil Storage Tank
5-P	20,000	Receiving Waste Oil Storage Tank
6-P	20,000	Receiving Waste Oil Storage Tank
7-P	20,000	Petroleum Contact Water Tank
8-P	20,000	Petroleum Product/ Industrial Wastewater Tank
9-P	20,000	Petroleum Product/ Industrial Wastewater Tank
10-P	9,000	Industrial Wastewater Tank
1-SW	30,000	Storm Water Receiving Tank
11-P	500	OWS Waste Oil Collection Tank

3.1 POSSIBLE SPILL PATHWAYS [112.7(b)]

Secondary containment has been provided around the tank and the piping systems to contain the fuel or used oil in the event of a failure of the primary tank or piping. The outer concrete walls and berms of the containment areas are sized to contain more than 110% of the volume of the largest petroleum tank. Drip pans positioned at the connection points around the petroleum delivery vehicle will serve as initial containment for a spill from the petroleum delivery vehicle. The direction of drainage flow is to the southeast corner of the property where the storm drain is located as shown in the Appendix A drawings.

In the event of a catastrophic failure of the tank or piping system resulting in a spill from a vehicle transferring fuel at the Tank Farm, the petroleum product would be expected to flow north and south into the driveway and into the secondary containment area on either side of the loading/unloading area. A catastrophic failure of the tank or piping system resulting in the breaching the containment system would flow to the southeast corner of the facility property.

Failure of piping or hoses at the loading/unloading area would be contained within the secondary containment area and the existing sumped work area. The remaining containment areas would be expected to have the discharge products flow in the direct of the closest collection sump.

3.2 CONTINGENCIES [7(a)]

Petroleum products could be spilled from the site in any of the following ways. The potential volumes and flow rates are estimates for the purposes of planning. Actual spills could be more or less, depending on the conditions at that time.

1. **Tank Overflow.** The failure of both the petroleum delivery personnel and WRI personnel to notice an overfill, would result in spill of product at a rate equal to the delivery rate of the vehicle. The spill rate could be as high as 300 gpm for a vehicle pumping fuel or used oil into an above ground tank.
2. **Tank Rupture.** The exterior of the tank is inspected regularly for signs of leaks or deterioration. However, in the unlikely event of the rupture or severe leak in both the primary and secondary containment, a maximum of 500 gallons per minute of fuel could be discharged by a sudden release. The amount would be less depending on the current quantity of fuel in the tank and the location and size of the leak.
3. **Faulty ancillary equipment.** The equipment associated with the fuel system is regularly inspected for signs of leaks or deterioration. However, in the event of failure of a component of the system, a leak that goes undetected for a long period of time could spill the current contents of the tank. The leak rate would probably not exceed 20 gallons per hour. The leak rate would depend on the location of the leak, size of the hole or which portion of the system failed.

3.3 PAST SPILL EVENTS [112.7(a)]

The facility has not had any small or major spill events in the past while under the management of WRI.

4.0 SPILL CONTROL MEASURES

The following spill control methods and procedures have been implemented by WRI as discussed in sections 4.1 through 4.4 for the spill materials, secondary containment, fuel transfer area and chemical storage areas.

4.1 SPILL RESPONSE MATERIAL

Spill response materials are located at the transfer area as shown by Drawing 1338-3 in Appendix A. The spill response materials are stored in the maintenance building. At a minimum, these materials include floating containment boom, absorbent booms, absorbent socks, absorbent pads, absorbent material, bung wrench, plastic bags, drain cover, duct tape, plastic over pack drum, epoxy sealer, wood wedges, shovel, rakes, pitchforks, brooms, mops, rope, buckets, cable, water hose, trouble lights, extension cords, fire extinguishers, gloves, hand tools, safety glasses/face shields, winch, first aid kit, wet/dry vacuum, cutting saw and personal safety equipment. These items are maintained at the tool crib inside the maintenance building. Spill response materials will be inventoried and replenished or replaced with new material immediately upon usage or degradation. Operating personnel are trained on the proper use and maintenance of the spill response materials in accordance with Section 2.4 of this Plan.

4.2 SECONDARY CONTAINMENT [112.7(e)(2)(i)&(ii)]

The storage tanks consist of a steel primary tank with a concrete or concrete masonry unit walls filled with concrete and sealed with an epoxy paint system. Steel is a compatible material for the storage of diesel fuel, light ends and used oil. The tank containment area covers the hose connection zone for the Tank Farm. The Tank Farm has sufficient secondary containment capacity to hold the contents of the largest tank and a normal rainfall event. The truck is parked in the secondary containment area during transfer operations. The diked area created by the secondary containment wall and ramps has sufficient capacity for containment of the largest compartment of the truck used to transfer petroleum to or remove petroleum from the Tank Farm.

4.2.1 Maintenance of Secondary Containment Areas

Secondary containment areas for the tank system consist of the outer wall of the containment area for the Tank Farm, loading/unloading area and Industrial Wastewater Plant. These areas are inspected monthly in accordance with Section 2.3 of this Plan. Solid material, petroleum or water is not allowed to accumulate within the secondary containment areas. Any accumulation of fluid is removed immediately upon discovery. The following procedures have been implemented for the removal of fluid from containment areas.

4.2.2 Removal of Water from Secondary Containment [112.7(e)(2)(A-D)]

The following standard operating procedure has been implemented for removing water accumulated within secondary containment areas.

1. Accumulated water is inspected for the presence of a sheen or petroleum odor.
2. If a sheen or petroleum odor is present, the water is considered to be contaminated with petroleum. Removal shall follow the procedure outlined in Section 5.2.1 of this Plan.
3. The water is not considered to be contaminated and may be disposed in the sanitary sewer or storm drain if a sheen or petroleum odor is not present. Water that is not considered to be contaminated will be sampled and analyzed for total oil and grease by the FLPRO method. Water that has equal to or less than 5.0 mg/l petroleum hydrocarbons may be discharged to the sanitary sewer or storm drain system provided a sheen or petroleum odor is not present as well. Water that has greater than 5.0 mg/l petroleum hydrocarbons will be pretreated and discharged in accordance with the JEA Industrial Pretreatment Permit.
4. Records consisting of the date, time, estimated quantity of accumulation, presence or absence of sheen or petroleum odor and person removing accumulation are maintained for each discharge event. This information shall be noted on the Secondary Containment Fluid Removal Record located in Appendix D of this plan.

4.3 FUEL TRANSFER AREA

The loading/unloading area of the Tank Farm is where the liquid petroleum is transferred. The fuel transfer area for vehicles is crowned and slopes towards the center of the tank farm or the industrial wastewater pretreatment facility. The hose connection area is inside the secondary containment.

Absorbent booms to be used during fueling operations are stored in the spill kit at the maintenance building. WRI personnel are responsible for properly deploying the booms in the event of a spill during a petroleum transfer operation.

Any spill breaching the secondary containment will likely travel to the southeast into the stormwater drain. Any such spill could cause significant soil or soil contamination. This storm drain should be protected in the event of a spill of petroleum during the petroleum transfer process. Any such spill should be intercepted by using absorbent powder or booms placed at the storm drain or along the path to the storm drain. The spill response supplies are located inside the maintenance building at the center of the facility.

Diesel fuel, gasoline, petroleum products and used oil are transferred into storage tanks and vehicles at the Tank Farm. The fuel transfer area is inside the secondary containment of the exterior walls and sloped ramps. Drip pans will be used during transfer operations at the temporary connections to provide primary containment during the connection of hoses and lines.

4.4 CHEMICAL STORAGE AREA

The chemical storage area is located west of the control room. The area is constructed such that an eight-inch curb surrounds the entire area. The diked area is sufficient to contain the contents of the largest chemical tank stored within the area. Further, it is sufficient to contain the contents of the largest chemical tank in the area in the event of a spill. The diked portion is sealed with an epoxy sealant to provide an impervious surface to contain leaks or spillage. Proper procedures regarding the storage and usage of incompatible materials (i.e. sulfuric acid and sodium hydroxide which are both used for treatment) are followed to prevent potential chemical exothermic reactions, which may occur if incompatible materials are mixed unknowingly.

5.0 SPILL COUNTERMEASURES

In the event of a spill of petroleum at this facility, the Water Recovery, LLC Spill Team Coordinator shall be contacted immediately at (904) 475-9320.

Initial response to a spill of petroleum from the fueling facility, fueling vehicle parking area, or ancillary equipment will be handled by the facility operating personnel under the direction of the Spill Team Coordinator. The facility is designed to provide secondary containment of petroleum spills resulting from failure of the largest tank. Secondary containment for the petroleum vehicle has been provided for transfer operations. Steps must be taken to contain the spill in the smallest possible area and prevent petroleum from entering a body of water or leaving the facility property should this secondary containment fail during a spill event. The following applicable procedures should be taken. The information should be recorded on the Petroleum Spill Report Record located in Appendix B of this Plan.

5.1 NOTIFICATION PROCEDURES

A. Corporate Notification

If a spill has been detected that requires out side support the **FIRST POINT OF CONTACT** is the Water Recovery, LLC Spill Team Coordinator (STC)

at (904) 475-9320. The second point of contact is the WRI Spill Response Coordinator, Mr. Steven Jenkins. The third person to contact should be the Alternate Spill Team Coordinator, Mr. Harry Owens. The following personnel should also be contacted as soon as possible.

<u>Title</u>	<u>Name</u>	<u>Phone/Pager/Mobile/Home</u>
Spill Team Coordinator	Greg Reynolds	(904) 475-9320 W No Beeper. (904) 614-0145 M (904) 215-2425 H
Home Address: 1668 Pinecrest Drive Orange Park, FL 32003		
Spill Response Coordinator	Steven Jenkins	(904) 241-2200 W No Beeper. (904) 868-8546 M (904) 241-7886 H
Home Address: 1962 Colina Court Atlantic Beach, FL 32233		
Alternate Spill Team Coordinator	Harry Owens	(904) 475-9320 W No Beeper (904) 477-2749 M (904) 241-7886 H
Home Address: 5056 Bradford Road Jacksonville, FL 32217		

B. Emergency Personnel Notification

IF NECESSARY, CONTACT THE LOCAL FIRE DEPARTMENT, POLICE DEPARTMENT AND AMBULANCE SERVICE BY DIALING 911.

C. Regulatory Agency Notification

The WRI Production Manager is responsible for notification of the regulatory agencies. One phone call within the initial hour of the spill should be made to the these regulatory agencies if possible. The following regulatory agencies should be contacted within 24 hours at the latest depending on the quantity of petroleum spilled. The Alternate Spill Team Coordinator should made the agency notifications so that the Spill Team Coordinator can focus on cleaning up the spill and manage the response action properly.

National Response Center.....(800) 424-8802
US Environmental Protection Agency, Region IV(404) 562-8700
State Environmental Agency (FDEP)(904) 807-3300
(State Warning Point).....(800) 320-0519
Local Environmental Agency (EQD).....(904) 630-3635
Northeast Florida Regional Planning Council(904) 279-0880
United States Coast Guard(904) 564-7500 EXT 0
Florida Fish & Wildlife Conservation Commission(850) 488-4676

When making reports to these agencies, the following checklist should be completed. The Petroleum Spill Report Record in Appendix B should be utilized in gathering information.

1. Name, address and telephone number of person reporting.
2. Exact location of spill.
3. Company name and location
4. Material spilled. (Diesel fuel, gasoline or lube oils are used in this system).
5. Estimated quantity. (Maximum Tank Capacity is 30,000 gallons; filled to a maximum of 95% capacity.)
6. Source of spill.
7. Cause of spill.
8. Name of body of water involved, or nearest body of water to spill area.
9. Action taken for containment and clean up.

If petroleum needs to be pumped out of a tank, the area around the tank or from inside the secondary containment area, refer to Section D for petroleum handling companies to be used. Instruct them to bring sufficient equipment and oil absorbing material to clean up or dike the spill. Spill response materials located at the site may also be used.

D. Petroleum Spill Clean-up Contractor

Moran Environmental Recovery, LLC
Incident Coordinator, Mr. Jay Daniels, Vice President(904) 241-2200

E. Petroleum Spill / Environmental Engineers

The environmental and facility engineer listed below is most familiar with the facility design and layout.

A temporary tank may be needed to store recovered product from spill response actions. The damaged fuel or used oil tank should be repaired or replaced as soon as possible. Coordinate with personnel on-site for placement of the temporary tank.

The engineer most familiar with the tank system design are:

Timothy W. Rudolph, P.E.	ENVIRONEERING, Inc.....	(904) 665-0100
	FAX	(904) 665-0101
	MOBILE	(904) 612-1456
	EMAIL	timenvironeering@bellsouth.net

5.2 PROCEDURES FOR RESPONDING TO A SPILL OF PETROLEUM

5.2.1 Spill of Petroleum Within Secondary Containment

The following standard operating procedure has been implemented for removing petroleum from within secondary containment areas.

1. Determine source of spilled petroleum. Leaks from tanks, piping, or valves shall be repaired upon discovery. To eliminate flow of fuel in piping close the appropriate valves to prevent flow from the tank systems.
2. Small accumulations of petroleum should be removed with absorbent material. Spent absorbent material shall be disposed in accordance with the more stringent of WRI policy or local, state or federal regulations.
3. Large accumulations of petroleum shall be contained using the spill materials located at the site. Follow the directions included with the materials. Fuel can be removed with a portable pump or vacuumed and the site cleaned by one of the approved contractors. When the Spill Response Company is called to handle the fuel, they should be instructed to bring sufficient equipment and oil sorbing materials to clean up and dike the leaking fuel. Recovered petroleum may be considered for use by the facility, sent to a permitted petroleum recycling facility or otherwise

disposed of in accordance with the more stringent of WRI policy or local, state or federal regulations.

4. Records consisting of the date, time, estimated quantity of accumulation, person removing accumulation, reason for accumulation and corrective actions taken to prevent further accumulation shall be maintained for each incident. This information shall be noted on the Secondary Containment Fluid Removal Record located in Appendix D of this Plan.

5.2.2 Spill From a Leak in the Piping

If a leak should occur in the piping, (inside or outside the secondary containment area), the valve located at the tank should be closed to prevent further flow. The petroleum spill should be addressed as described in Section 5.2.1. The piping should be replaced or repaired as soon as possible.

5.2.3 Spill Through Walls

When a tank wall is breached, the spill should be contained using the spill materials located at the site, as quickly as possible. When the Spill Response Company is called to handle the fuel, they should be instructed to bring sufficient equipment and oil sorbing materials to clean up and dike the leaking fuel. The fuel spill should be addressed as described in Section 5.2.1. A temporary tank may be needed for the recovery of spilled product or for the temporary storage of product, as deemed necessary. Remaining petroleum should be transferred from the leaking tank to the temporary petroleum tank. The leaking tank should be replaced or repaired as soon as possible.

5.2.4 Petroleum Spill Entering a Body of Water or Storm Sewer

In the event that a petroleum spill has entered a body of water such as a sewer system, efforts should be made to prevent the petroleum from progressing.

1. Apply booms in the pathway of the spill to prevent the petroleum from traveling down stream.
2. Broadcast absorbent material over the surface of the petroleum.
3. Notify the Spill Team Coordinator (STC) and corporate personnel, giving as much information as possible concerning the nature of the spill and potential threat to personal safety and environmental damage. The WRI

Spill Response Coordinator is required to notify the regulatory agencies listed in the Plan.

4. Upon notification, the Water Recovery, LLC Spill Team Coordinator (STC) will notify emergency personnel, giving as much information as possible, concerning the nature of the spill and potential threat to personal safety and environmental damage.
5. Estimate the quantity of petroleum that has entered the water and record information on the Petroleum Spill Record. Complete Petroleum Spill Report Record located in Appendix B of this Plan.
6. Petroleum impacted soils, absorbent material and tools contaminated with petroleum shall be removed and remediated or disposed by a disposition contractor in accordance with WRI policy that may be more stringent than local, state and federal regulations.
7. The Spill Team Coordinator will file the necessary reports with regulatory agencies in accordance to applicable local, state and federal regulations.

5.3 FIRE PROCEDURE [7(a)]

IN CASE OF FIRE, use nearest TELEPHONE TO CALL THE FIRE DEPARTMENT by dialing (904) 630-0529 or 911.

IF FIRE DEVELOPS, USE proper equipment at hand to extinguish the fire, pending arrival of the Fire Department. Fire extinguisher locations are noted on Figure (1) along with the facility Hazardous Materials Storage Locations.

Notify everyone in the immediate area of the fire verbally that there is a FIRE.

Leave the area if the fire gets out of control and wait for the Fire Department to arrive.

- KEEP CALM, think, avoid panic and confusion.
- CLEAR AREA to a safe distance from the fire.
- TELEPHONE, 241-2200 and notify the Moran Environmental Recovery, LLC (MER) INCIDENT COMMANDER. Know the location of the nearest telephone in your area.
- SPREAD THE ALARM - PASS THE WORD.
- RESCUE any injured individual(s) when possible without risking your safety.
- Avoid contact with liquid or fumes. Do not become a victim yourself.

- IMMEDIATELY REPORT spill to the MER INCIDENT COMMANDER at telephone 241-2200 (24 hours).
- All personnel except authorized response personnel shall clear the area.

REPORTING INFORMATION

WHENEVER POSSIBLE, give the following information if known or can reasonably be determined.

- YOUR NAME and telephone number or extension.
- Spill location.
- Number and type of injuries.
- Identify type and amount of spilled waste.
- Spill source.
- Behavior of spilled material.
- Anticipated movement of spill.
- Time spill occurred.

The designated Spill Response Coordinator will take command of response operations. The Spill Response Coordinator shall assess the situation and take the following action.

Activate and direct facility response personnel to implement emergency response operations to protect life and property. The order of operations will depend on existing conditions and may be concurrent.

- SECURE the spill area from unauthorized personnel.
- RESCUE any injured individuals without risking personal safety. Do not attempt rescue if proper resources are not available. Avoid contact with liquid or fumes.
- RESTRICT all ignition sources.
- IF SAFE and POSSIBLE, STOP SPILL SOURCE. Use on-site spill containment equipment and materials.
- QUICKLY DETERMINE the need to evacuate the building and implement the emergency evacuation procedures as required.
- IMMEDIATELY REPORT spill to the required authorities.
- CLEAN UP CONTAMINATION after fire is out and spill is contained.

5.4 EXPLOSION PROCEDURE [7(a)]

IN CASE OF EXPLOSION, use nearest TELEPHONE TO CALL THE FIRE DEPARTMENT, by dialing (904) 630-0529 or 911.

IF EXPLOSION DEVELOPS, USE proper equipment at hand to extinguish the FIRE

REMAINING AFTER THE EXPLOSION, pending arrival of the Fire Department. Fire extinguisher locations are noted on drawing in Appendix A.

Notify everyone in the immediate area of the explosion verbally that there has been an EXPLOSION.

Leave the area immediately if the possibility of another explosion exists or the fire remaining after the first explosion gets out of control and wait for the Fire Department to arrive.

- KEEP CALM, think, avoid panic and confusion.
- CLEAR AREA to a safe distance from the explosion.
- TELEPHONE, 241-2200 and notify the MER INCIDENT COMMANDER. Know the location of the nearest telephone in your area.
- SPREAD THE ALARM -- PASS THE WORD.
- RESCUE any injured individual(s) when possible without risking your safety.
- Avoid contact with liquid or times. Do not become a victim yourself.
- IMMEDIATELY REPORT spill to the MER INCIDENT COMMANDER at telephone 241-2200 (24 hours).
- All personnel except authorized response personnel shall clear the area.

REPORTING INFORMATION:

WHENEVER POSSIBLE, give the following information if known or can reasonably be determined.

- YOUR NAME and telephone number or extension.
- Spill location.
- Number and type of injuries.
- Identify type and amount of spilled waste.
- Spill source.
- Behavior of spilled material.
- Anticipated movement of spill.
- Time spill occurred.

The designated Spill Response Coordinator will take command of response operations. The Spill Response Coordinator shall assess the situation and take the following action.

Activate and direct facility response personnel to implement emergency response operations to protect life and property. The order of operations will depend on existing conditions and may be concurrent.

- SECURE the spill area from unauthorized personnel.

- RESCUE any injured individuals without risking personal safety. Do not attempt rescue if proper resources are not available. Avoid contact with liquid or fumes. RESTRICT all ignition sources.
- IF SAFE and POSSIBLE, STOP SPILL SOURCE. Use on-site spill containment equipment and materials.
- QUICKLY DETERMINE the need to evacuate the building and implement the emergency evacuation procedures as required.
- IMMEDIATELY REPORT spill to the required authorities.
- CLEAN UP CONTAMINATION after explosion is finished and fire is out and spill is contained.

5.5 SUDDEN RELEASE PROCEDURE [7(a)]

IN CASE OF A SUDDEN RELEASE, use nearest TELEPHONE TO CALL THE FIRE DEPARTMENT, by dialing (904) 630-0529 or 911.

IF A SUDDEN RELEASE OCCURS, use proper equipment at hand to contain the petroleum. Call the Spill Response Contractor MER at (904) 241-2200 if additional personnel, equipment or resources are needed to contain or cleanup the spill.

Notify everyone in the immediate area of the SUDDEN RELEASE verbally that there has been a SUDDEN RELEASE.

Leave the area immediately if the possibility of another SUDDEN RELEASE exists.

- KEEP CALM, think, avoid panic and confusion.
- CLEAR AREA to a safe distance from the spill.
- TELEPHONE, 241-2200 and notify the MER INCIDENT COMMANDER. Know the location of the nearest telephone in your area.
- SPREAD THE ALARM - PASS THE WORD.
- RESCUE any injured individual(s) when possible without risking your safety. Avoid contact with liquid or fumes. Do not become a victim yourself
- IMMEDIATELY REPORT spill to the MER INCIDENT COMMANDER at telephone 241-2200 (24 hours).
- All personnel except authorized response personnel shall clear the area.

REPORTING INFORMATION:

WHENEVER POSSIBLE, give the following information if known or can reasonably be determined.

- YOUR NAME and telephone number or extension.

- Spill location.
- Number and type of injuries.
- Identify type and amount of spilled waste.
- Spill source.
- Behavior of spilled material.
- Anticipated movement of spill.
- Time spill occurred.

The designated Spill Response Coordinator will take command of response operations. The Spill Response Coordinator shall assess the situation and take the following action.

Activate and direct facility response personnel to implement emergency response operations to protect life and property. The order of operations will depend on existing conditions and may be concurrent.

- SECURE the spill area from unauthorized personnel.
- RESCUE any injured individuals without risking personal safety. Do not attempt rescue if proper resources are not available. Avoid contact with liquid or fumes.
- RESTRICT all ignition sources.
- IF SAFE and POSSIBLE, STOP SPILL SOURCE. Use on-site spill containment equipment and materials.
- QUICKLY DETERMINE the need to evacuate the building and implement the emergency evacuation procedures as required.
- IMMEDIATELY REPORT spill to the required authorities. CLEAN UP CONTAMINATION after source is stopped and spill is contained.

6.0 EMERGENCY RESPONSE ARRANGEMENTS [7(b)]

Water Recovery, LLC has made emergency response arrangements with the local police department, local fire department and hospital. The arrangements include the facility layout, properties of used oil handled at the facility and associated hazards, normal employee work areas, plus entrances and evacuation routes.

Water Recovery, LLC has a written agreement with Moran Environmental Recovery, LLC (MER) to provide emergency spill response services. MER has back up emergency response contractor teams to provide additional response resources, if needed.

The local hospital has been familiarized with the properties of the materials handled at the WRI used oil processing facility and the possible injuries or illnesses resulting from fires, explosions or releases. The initial notifications to the fire department, police department and hospital were made by telephone call and postal mail. The fire department stops by about

once a year to make sure their personnel are familiar with the facility and the chemicals stored on the property. The MER vacuum and tanker trucks offload at WRI on a routine basis.

7.0 SPILL RESPONSE COORDINATORS [7(c)]

The primary WRI Spill Response Coordinator (SRC) and the Spill Team Coordinators (STC) are listed in the order of authority for command of the emergency response action. The response coordinator business address is 1819 B Albert Street in Jacksonville, Florida.

PRIMARY SPILL TEAM COORDINATOR

Greg Reynolds	(904) 475-9320 W
Vice President – Spill Team Coordinator	No Beeper.
Mobile	(904) 614-0145 M
Home	(904) 215-2425 H
Home Address: 1668 Pinecrest Drive	
Orange Park, FL 32003	

PRIMARY SPILL RESPONSE COORDINATOR

Steven Jenkins	(904) 475-9320 W
President – Spill Response Coordinator	No Beeper.
Mobile	(904) 868-8546 M
Home	(904) 241-7886 H
Home Address: 1962 Colina Court	
Atlantic Beach, FL 32233	

ALTERNATE SPILL TEAM COORDINATOR

Harry Owens	(904) 475-9320 W
Production Manager – Alternate Spill Team Coordinator	No Beeper
Mobile	(904) 477-2749 M
Home	(904) 241-7886 H
Home Address: 5056 Bradford Road	
Jacksonville, FL 32217	

8.0 SRC PROCEDURES [7(d)]

The designated Spill Response Coordinator (SRC) will take command of response operations. The Spill Response Coordinator shall assess the situation and take the following action.

Activate and direct facility response personnel to implement emergency response operations to protect life and property. The order of operations will depend on existing conditions and may be concurrent.

- SECURE the spill area from unauthorized personnel.
- RESCUE any injured individuals without risking personal safety. Do not attempt rescue if proper resources are not available. Avoid contact with liquid or fumes.
- RESTRICT all ignition sources.
- IF SAFE and POSSIBLE, STOP SPILL SOURCE. Use on-site spill containment equipment and materials.
- QUICKLY DETERMINE the need to evacuate the building and implement the emergency evacuation procedures as required.
- IMMEDIATELY REPORT spill to the required authorities.
- CLEAN UP CONTAMINATION after source is stopped and spill is contained.

The WRI Spill Response Coordinator (SRC) will notify employees and the appropriate authorities by telephone unless the employees are close at hand at which point they will be notified verbally. The emergency situation will be assessed visually. The SRC has the authority to commit the necessary resources to properly contain, manage and clean up the situation.

The authorities will be notified in accordance with the following list in the event of an emergency situation

National Response Center	(800) 424-8802
US Environmental Protection Agency, Region IV	(404) 562-8700
State Environmental Agency (FDEP)	(904) 807-3300
(State Warning Point)	(800) 320-0519
Local Environmental Agency (EQD)	(904) 630-3635
Northeast Florida Regional Planning Council	(904) 279-0880
United States Coast Guard	(904) 564-7500 EXT 0
Florida Fish & Wildlife Conservation Commission	(850) 488-4676

9.0 EMERGENCY RESPONSE EQUIPMENT [7(e)]

The facility is equipped with a number of portable fire extinguishers and a supply of a spill absorbent material, breathing gear and safety gear. The telephone numbers for fire, police and ambulance are posted on each telephone.

The used oil emergency spill kit is located in the maintenance building as shown by the Appendix A drawing 1338-3. The spill response kit contains the Table 9.1 items. The spill kit size is 85 gallons. WRI has the spill response equipment of Moran Environmental Recovery, LLC available for use during a spill.

TABLE 9.1 Used Oil Spill Kit Inventory

<u>QUANTITY</u>	<u>DESCRIPTION</u>
8 EA	SILVER SHIELD GLOVES
8 PR	NEOPRENE GLOVES
4 PR	TYVEK SUITS
2 EA	FACE SHIELDS
1 BL	ABSORBENT PADS
10 EA	ABSORBENT SOCKS
2 PR	BOOTS, STEEL TOE & SHANK, NEOPRENE
4 EA	PLASTIC BAGS
1 EA	BUNG WRENCH
2 EA	DRAIN COVER 3' X 3'
1 RL	DUCT TAPE
1 EA	PLASTIC OVERPACK DRUM
2 EA	EPOXY SEALER / WOOD WEDGES

The WRI main office and laboratory have telephones for emergency notification purposes. Voice and hand signals communications are used when necessary for emergency response purposes. Water Recovery, LLC will use voice communication first followed by the loudspeaker system, telephone system and compressed air horns.

The decontamination equipment located on site is sufficient to provide the necessary decontamination effort. Decontamination equipment includes the material necessary to clean the facility and the response personnel. A steam cleaner is located adjacent to the used oil transfer area for decontamination work. The personnel decontamination includes plastic, spray containers, plastic pools, drums and plastic bags. The personnel decontamination equipment is located in the maintenance building.

10.0 EMERGENCY STORAGE [7(f)]

Tanks with in the WRI tank farm will be used if at all possible to hold the recovered material that was released. Water Recovery, LLC also has available by contract ten portable 20,000-gallon frac tanks that may be used if they are available to store recovered material that was released. The frac tanks are owned by a third party and are stored at the MER facility.

Water Recovery, LLC will use covered roll off box containers for emergency storage of used oil contaminated solids.

Polyethylene sheet containments may also be used in an emergency. Normally two layers of six (6) mil polyethylene sheeting are used for a temporary containment system.

11.0 EQUIPMENT DECONTAMINATION [7(g)]

The equipment that is contaminated with used oil after the emergency response effort has been completed will be cleaned using a commercial detergent solution mixed in accordance with the manufactures' instructions. The items will also be cleaned with a high-pressure water spray that may be elevated to a suitable cleaning temperature.

Damaged equipment that cannot be repaired will be replaced. The WRI Purchaser will order the new equipment as necessary and authorized.

12.0 EVACUATION PLAN [7(h)]

Evacuation notices are to broadcast via the Internal Public Announcement System or other appropriate means. In the event that a total evacuation is required, personnel will follow specified primary or alternative evacuation routes and remain in the designated evacuation area until the Spill Response Coordinator permits re-entry. Appendix A shows the emergency evacuation routes for escape.

13.0 REPORTABLE INCIDENTS [7(k)]

Reportable incidents will be reported with in the regulatory notification time requirement to the proper authorities as listed in section 7.0 of this plan. The notification will be made when possible within the first hour.

The Spill Team Coordinator will note in the operating record the item, date and details of any incident that requires the implementation of the Contingency Plan or any portion thereof and will submit a written report of the incident to the EPA Regional Administrator, in accordance with 40 CFR 265.565 (j). This report shall be addressed to the local Environmental Regulation Agencies and will confirm the following:

- A. Name, address and telephone number of the owner and operator of the shop.
- B. The name, address and telephone number of the shop.
- C. The date and time of the incident.
- D. The name and quantities of materials involved.
- E. Extent of any injuries.

F. An assessment of the actual or potential hazards to human health or environment.

G. Estimated quantities and disposal of recovered materials that result from the incident.

The local Environmental Regulation Agencies are;

- (1) Florida Department of Environmental Protection (FDEP)
7825 Baymeadows Way, Suite B200,
Jacksonville, Florida 32256-7577
- (2) Environmental Quality Division (EQD)
407 North Laura Street, Third Floor
Jacksonville, Florida 32202

APPENDIX A

Drawings

INDEX

Items

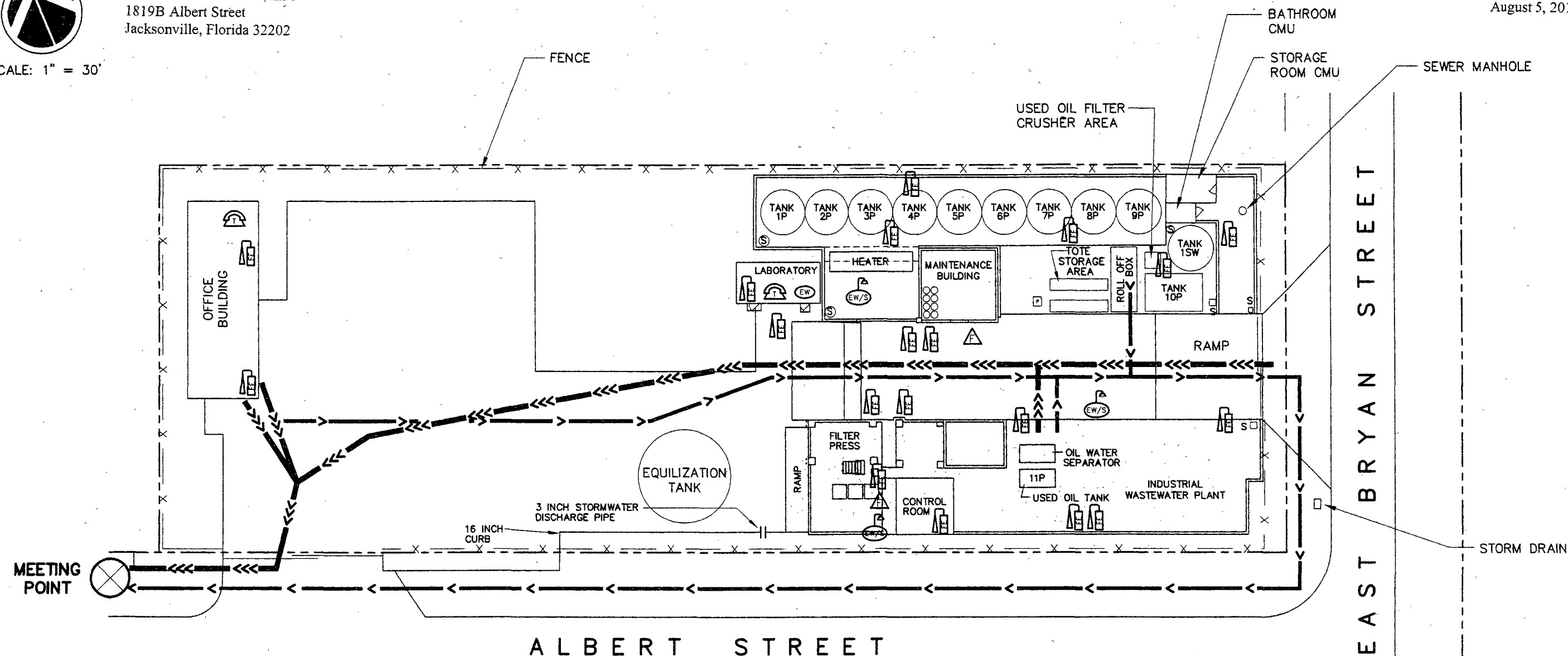
Drawing No. 4034-1 Emergency Evacuation Routes
Drawing No. 4034-2 WRI Used Oil Facility Site Plan
Drawing No. 4034-3 Hazardous Material Storage Location
Drawing No. 4034-4 Hazardous Material Storage Location
Drawing No. 4034-5 Closure Sampling Locations
Drawing No. 4034-6 Material and Waste Traffic Pattern
Drawing No. 4034-7 Used Oil Processing Area
Drawing No. 4034-8 Secondary Containment Calculation Area



USED OIL PERMIT
WATER RECOVERY, LLC
1819B Albert Street
Jacksonville, Florida 32202

SCALE: 1" = 30'

Page 35 of 59
Revision 2
August 5, 2010



LEGEND







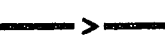
-  FIRE EXTINGUISHER
-  EMERGENCY EYEWASH/SHOWER
-  TELEPHONE
-  FIRE ALARM / AIR HORN
-  EMERGENCY SHOWER
-  PRIMARY EVACUATION ROUTE
-  ALTERNATIVE EVACUATION ROUTE

FIGURE 2 - EMERGENCY EVACUATION ROUTES -WRI-4600-2/SPCC

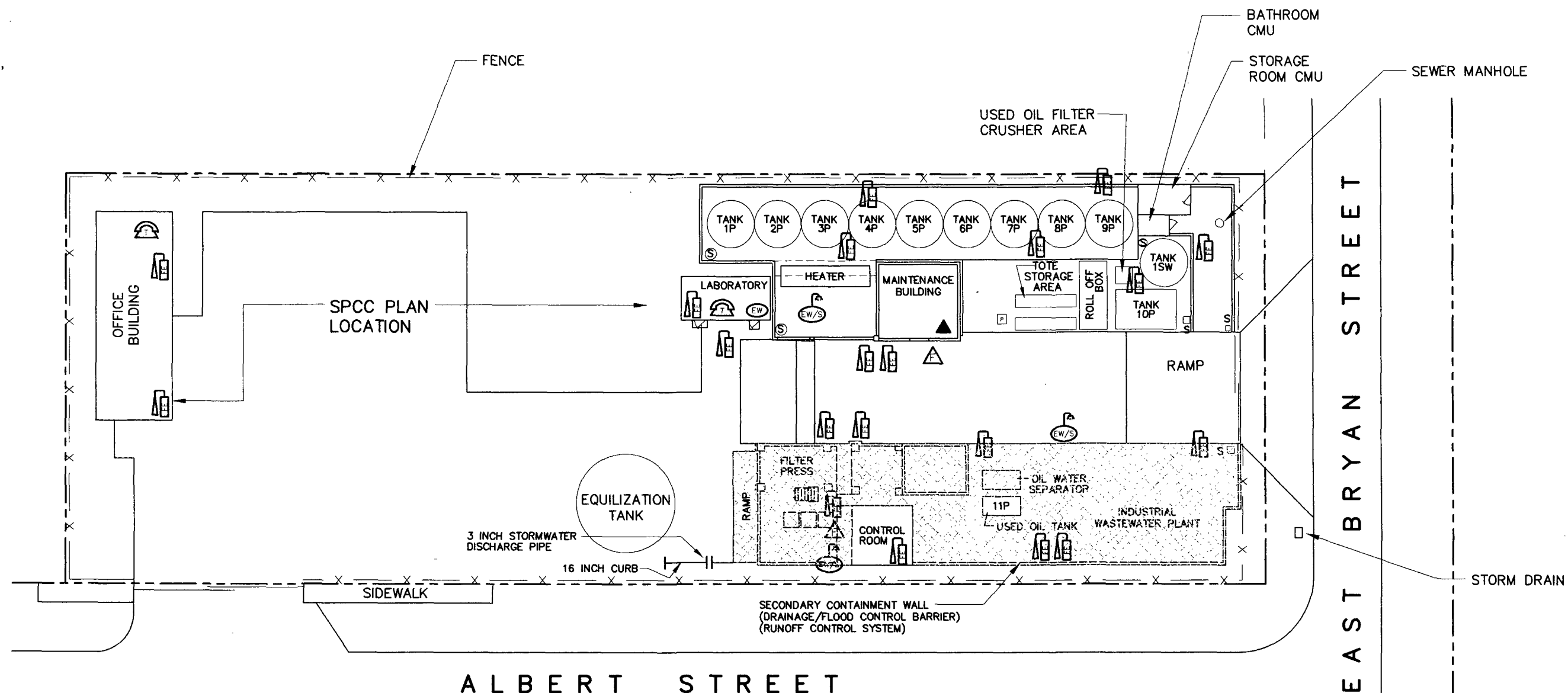
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WATER RECOVERY, LLC
1819 ALBERT STREET
JACKSONVILLE, FL 32202

PREPARED BY:
ENVIRONEERING, INC.
1735 EMERSON STREET, SUITE 3
JACKSONVILLE, FL 32207
904-665-0100







CHECKED BY: TWR	DRAWN BY: GCR
APPROVED BY: TWR	DATE: 8/04/10
JOB NO. 4034	SCALE: 1"=30'
REVISED:	4034-1 DRAWING NO.



SCALE: 1" = 30'



LEGEND

- SPILL KIT
-  FIRE EXTINGUISHER
-  TELEPHONE
-  EMERGENCY EYEWASH/SHOWER
-  EMERGENCY SHOWER
-  FIRE ALARM / AIR HORN
-  DECONTAMINATION SUPPLIES

TANK NUMBER	CAPACITY (GALLONS)	CONTENTS OF TANK
1P	23,232	USED OIL
2P	23,232	USED OIL
3P	23,232	USED OIL
4P	21,445	USED OIL
5P	20,778	USED OIL
6P	25,806	USED OIL
7P	21,446	PETROLEUM CONTACT WATER
8P	21,446	INDUSTRIAL WASTEWATER/ PETROLEUM PRODUCTS
9P	20,833	INDUSTRIAL WASTEWATER/ PETROLEUM PRODUCTS
10P	10,000	INDUSTRIAL WASTEWATER
11P	500	USED OIL
SW1	30,000	STORMWATER

FIGURE 1 - WRI USED OIL FACILITY SITE PLAN - WRI-4200-1/4800-1/SPCC

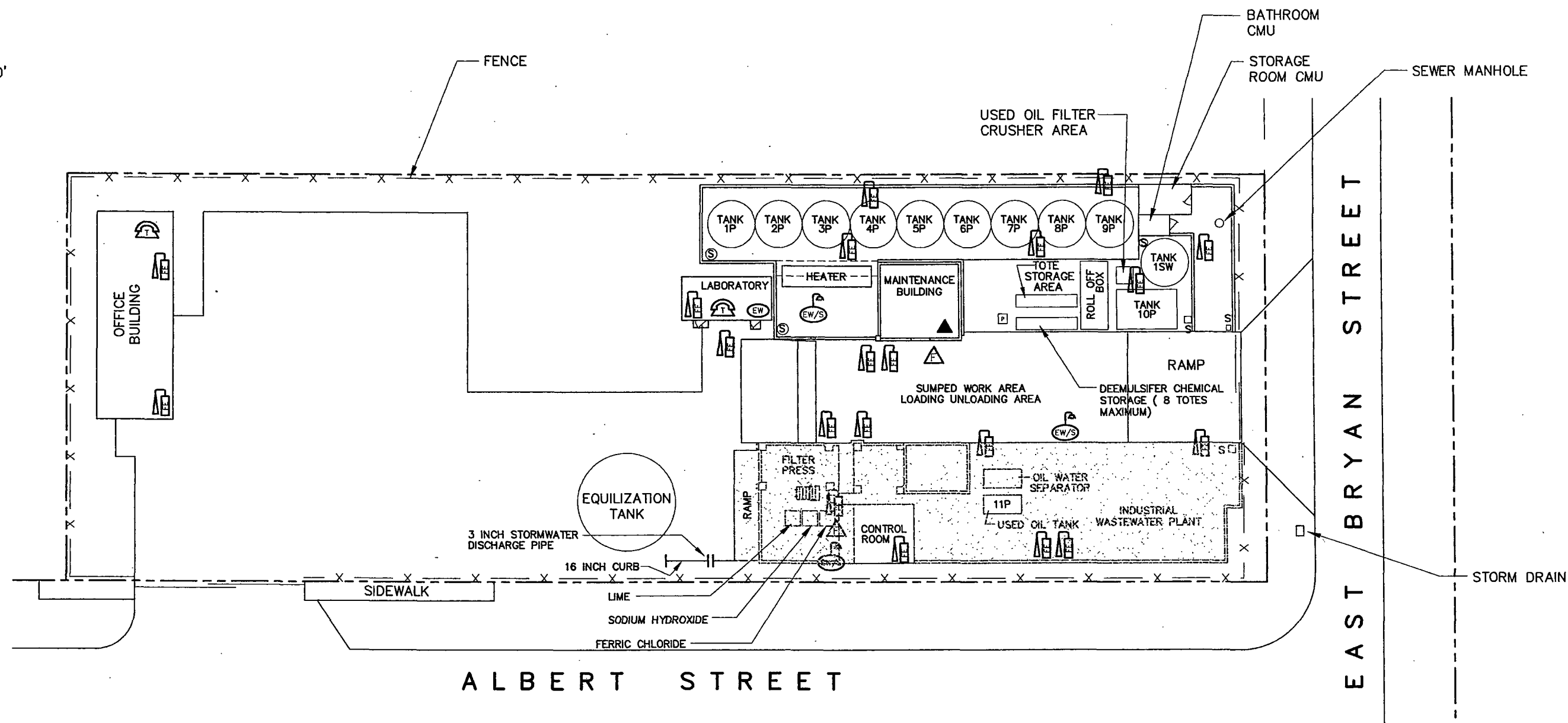
PREPARED FOR:
WATER RECOVERY, LLC
1819 ALBERT STREET
JACKSONVILLE, FL 32202

PREPARED BY:
ENVIRONEERING, INC.
1735 EMERSON STREET, SUITE 3
JACKSONVILLE, FL 32207
904-665-0100

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APPROVED BY: TWR	DATE: 8/04/10
JOB NO. 4034	SCALE: 1"=30'
REVISED:	4034-2 DRAWING NO.



SCALE: 1" = 30'



LEGEND






- SPILL KIT
-  FIRE EXTINGUISHER
-  TELEPHONE
-  EMERGENCY EYEWASH/SHOWER
-  EMERGENCY SHOWER
-  FIRE ALARM / AIR HORN

FIGURE 2 - HAZARD MATERIAL STORAGE LOCATION -WRI-4200-2

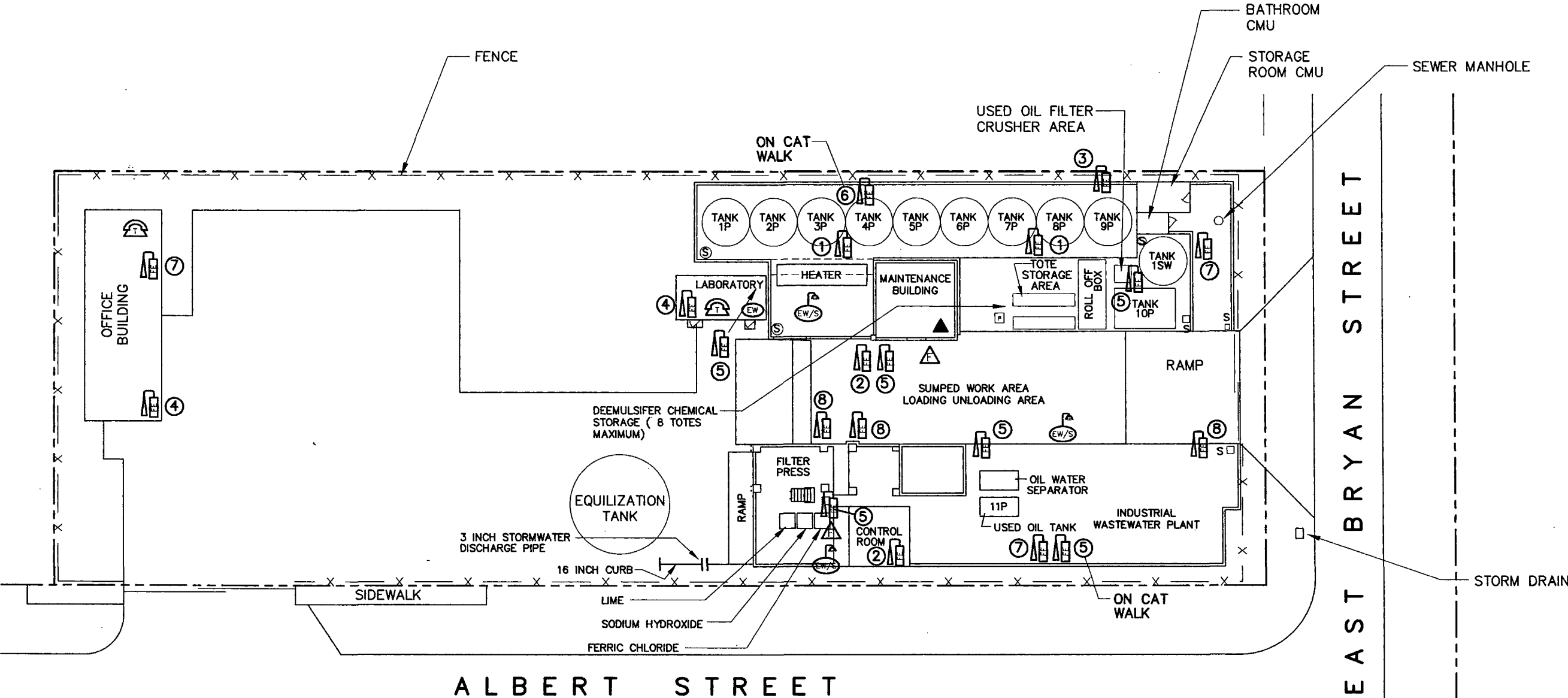
PREPARED FOR:
WATER RECOVERY, LLC
1819 ALBERT STREET
JACKSONVILLE, FL 32202

PREPARED BY:
ENVIRONEERING, INC.
1735 EMERSON STREET, SUITE 3
JACKSONVILLE, FL 32207
904-665-0100






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APPROVED BY: TWR	DATE: 8/04/10
JOB NO. 4034	SCALE: 1"=30'
REVISED:	4034-3 DRAWING NO.



SCALE: 1" = 30'



L E G E N D

- SPILL KIT
-  FIRE EXTINGUISHER
-  TELEPHONE
-  EMERGENCY EYEWASH/SHOWER
-  EMERGENCY SHOWER
-  FIRE ALARM / AIR HORN

QTY	
①	(2) BC 10 lb
②	(2) CO ₂ 10 lb
③	(1) CO ₂ 15 lb
④	(3) BC 5 lb
⑤	(5) ABC 20 lb
⑥	(1) BC 20 lb
⑦	(3) ABC 5 lb
⑧	(3) ABC 10 lb

NOTE: FIRE EXTINGUISHER TYPE, LOCATION AND QTY. PER NFPA 10.

FIGURE 1 – HAZARD MATERIAL STORAGE LOCATION –WRI-4500-1/4600-1/4700-1

PREPARED FOR:
WATER RECOVERY, LLC
1819 ALBERT STREET
JACKSONVILLE, FL 32202

PREPARED BY:
ENVIRONEERING, INC.
1735 EMERSON STREET, SUITE 3
JACKSONVILLE, FL 32207
904-665-0100

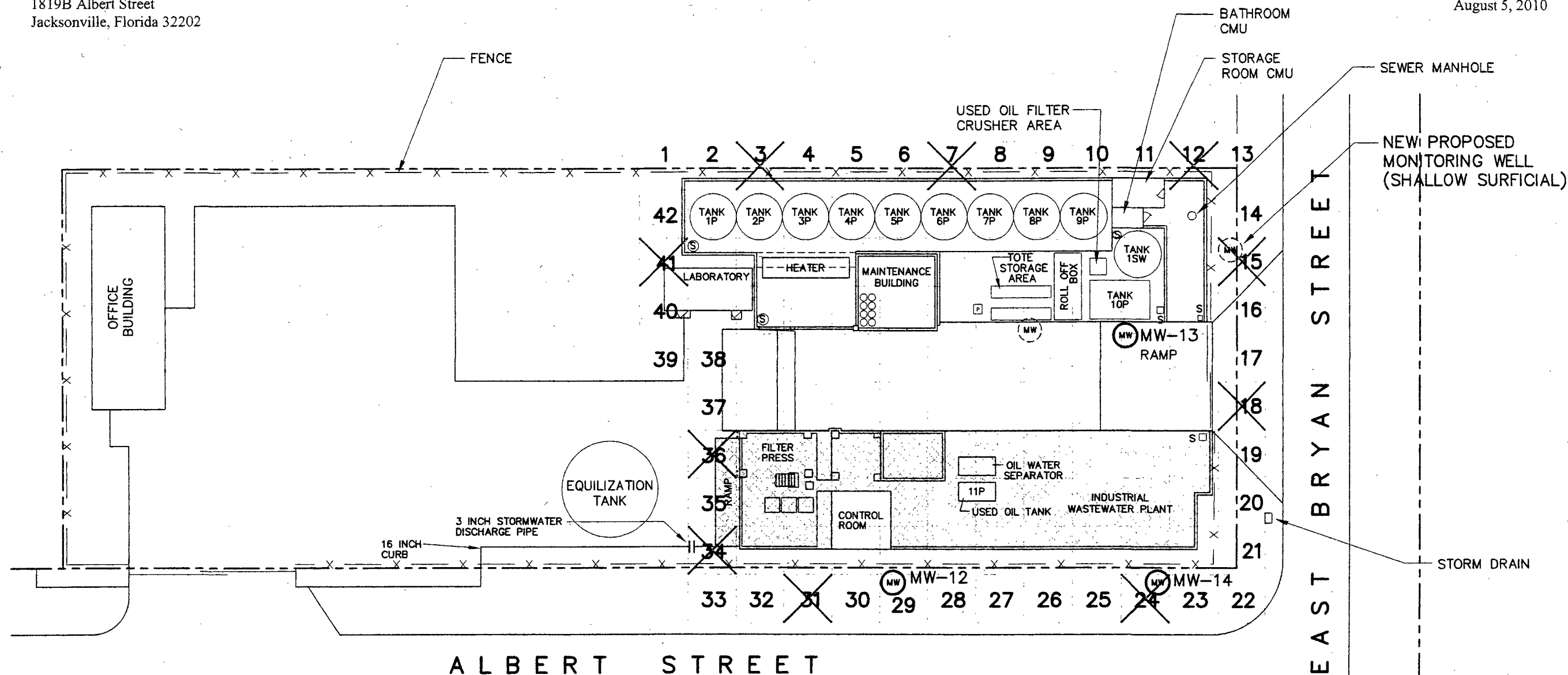
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REVISED:	4034-4 DRAWING NO.



USED OIL PERMIT
WATER RECOVERY, LLC
1819B Albert Street
Jacksonville, Florida 32202

SCALE: 1" = 30'

Page 39 of 59
Revision 2
August 5, 2010



LEGEND

- 33 SOIL SAMPLE LOCATION
0-6" BLS AND 6"-24" BLS
- MW MONITORING WELL LOCATION EXISTING
- MW NEW MONITORING WELL LOCATION

FIGURE 2 - CLOSURE SAMPLING LOCATIONS - WRI-4800-2

PREPARED FOR:
WATER RECOVERY, LLC
1819 ALBERT STREET
JACKSONVILLE, FL 32202

PREPARED BY:
ENVIRONTEERING, INC.
1735 EMERSON STREET, SUITE 3
JACKSONVILLE, FL 32207
904-665-0100

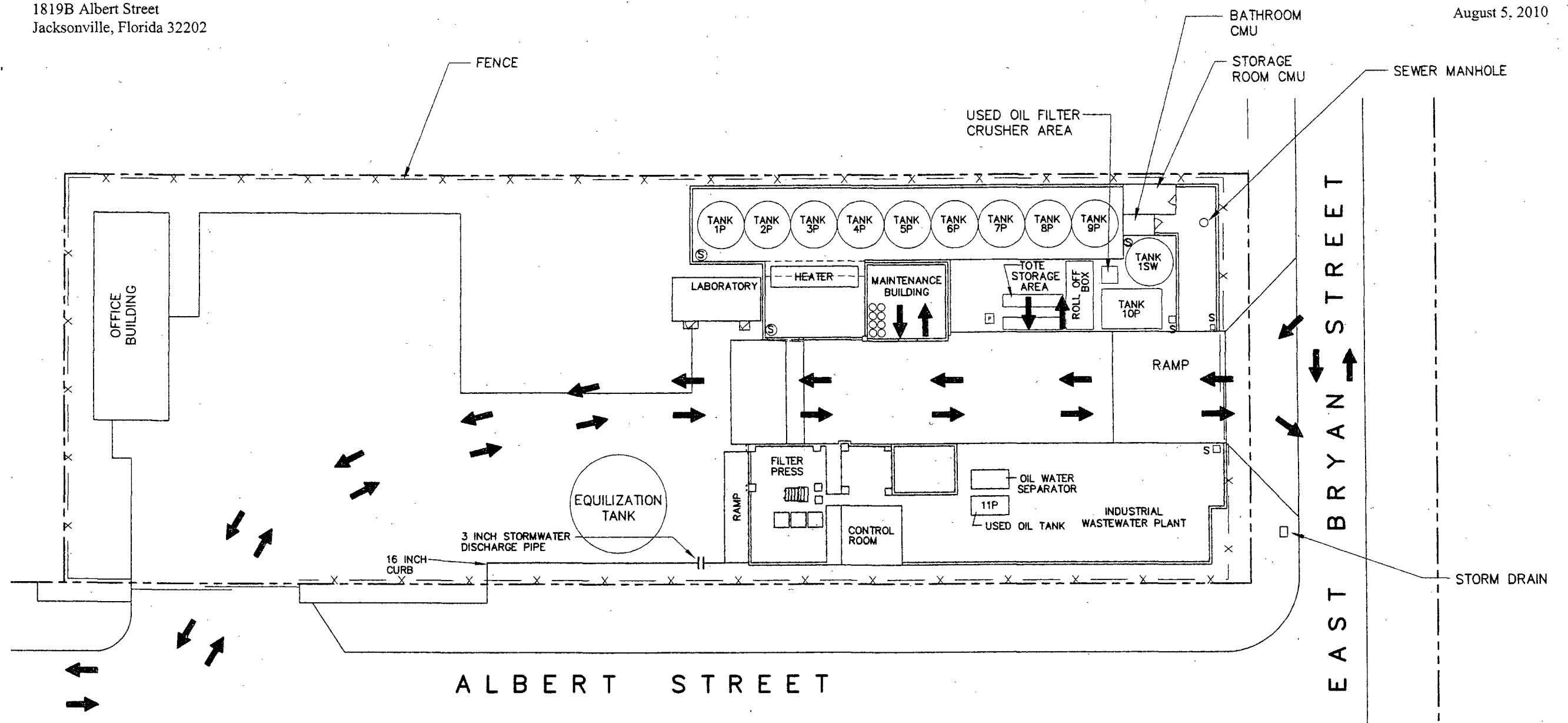
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APPROVED BY: TWR	DATE: 8/04/10
JOB NO. 4034	SCALE: 1"=30'
REVISED:	4034-5 DRAWING NO.



USED OIL PERMIT
WATER RECOVERY, LLC
1819B Albert Street
Jacksonville, Florida 32202

SCALE: 1" = 30'

Page 40 of 59
Revision 2
August 5, 2010



LEGEND

- ➔ TRAFFIC FLOW PATTERN
S SUCTION
D DISCHARGE

TANK NUMBER	CAPACITY (GALLONS)	CONTENTS OF TANK
1P	23,232	USED OIL
2P	23,232	USED OIL
3P	23,232	USED OIL
4P	21,445	USED OIL
5P	20,778	USED OIL
6P	25,806	USED OIL
7P	21,446	PETROLEUM CONTACT WATER
8P	21,446	INDUSTRIAL WASTEWATER/ PETROLEUM PRODUCTS
9P	20,833	INDUSTRIAL WASTEWATER/ PETROLEUM PRODUCTS
10P	10,000	INDUSTRIAL WASTEWATER
11P	500	USED OIL
SW1	30,000	STORMWATER

FIGURE 4 - MATERIAL AND WASTE TRAFFIC PATTERN

PREPARED FOR:
WATER RECOVERY, LLC
1819 ALBERT STREET
JACKSONVILLE, FL 32202

PREPARED BY:
ENVIRONEERING, INC.
1735 EMERSON STREET, SUITE 3
JACKSONVILLE, FL 32207
904-665-0100

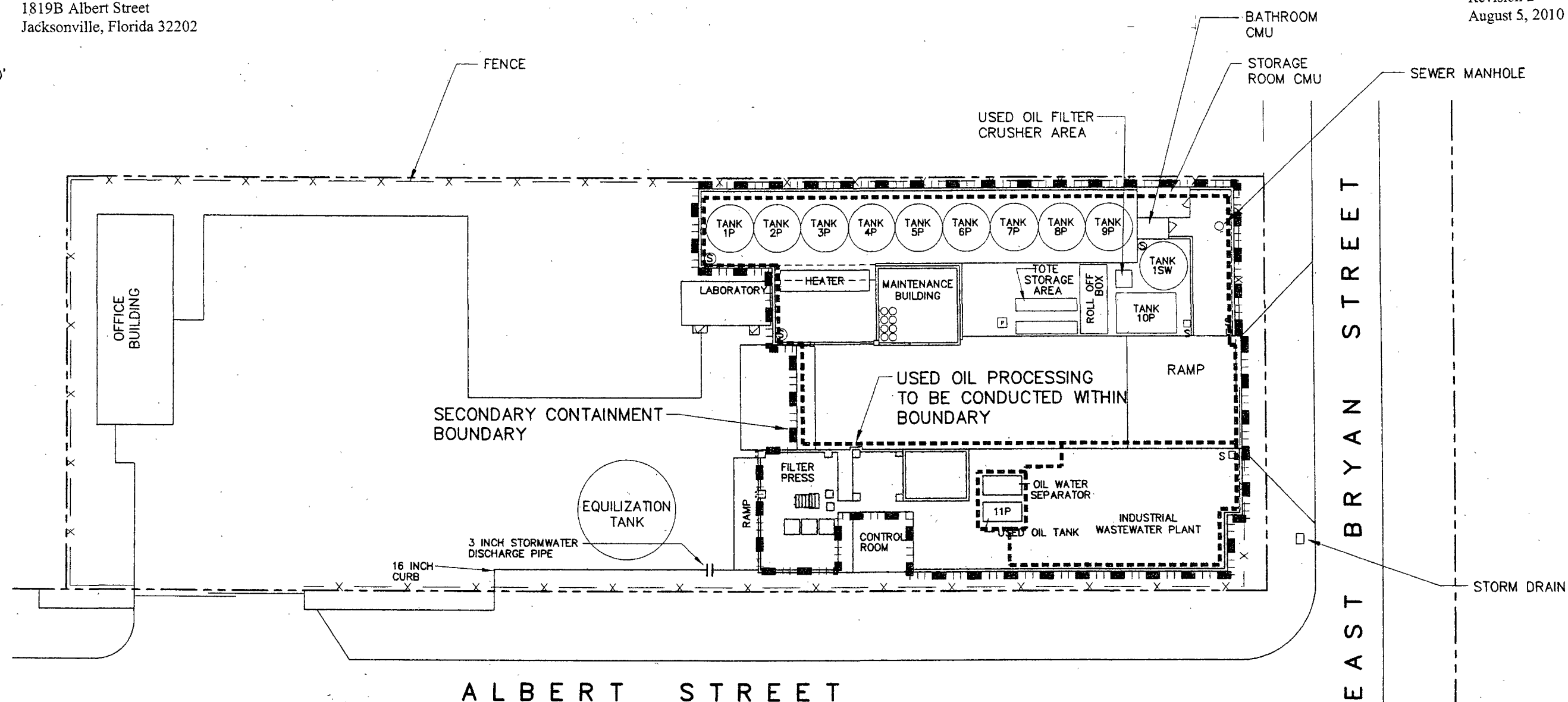
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APPROVED BY: TWR	DATE: 8/04/10
JOB NO. 4034	SCALE: 1"=30'
REVISED:	4034-6 DRAWING NO.



USED OIL PERMIT
WATER RECOVERY, LLC
1819B Albert Street
Jacksonville, Florida 32202

SCALE: 1" = 30'

Page 41 of 59
Revision 2
August 5, 2010



LEGEND

----- USED OIL PROCESSING PERMIT BOUNDARY

----- SECONDARY CONTAINMENT BOUNDARY

TANK NUMBER	CAPACITY (GALLONS)	CONTENTS OF TANK
1P	23,232	USED OIL
2P	23,232	USED OIL
3P	23,232	USED OIL
4P	21,445	USED OIL
5P	20,778	USED OIL
6P	25,806	USED OIL
7P	21,446	PETROLEUM CONTACT WATER
8P	21,446	INDUSTRIAL WASTEWATER/ PETROLEUM PRODUCTS
9P	20,833	INDUSTRIAL WASTEWATER/ PETROLEUM PRODUCTS
10P	10,000	INDUSTRIAL WASTEWATER
11P	500	USED OIL
SW1	30,000	STORMWATER

FIGURE 2 - USED OIL PROCESSING AREA

PREPARED FOR:
WATER RECOVERY, LLC
1819 ALBERT STREET
JACKSONVILLE, FL 32202

PREPARED BY:
ENVIRONNEERING, INC.
1735 EMERSON STREET, SUITE 3
JACKSONVILLE, FL 32207
904-665-0100

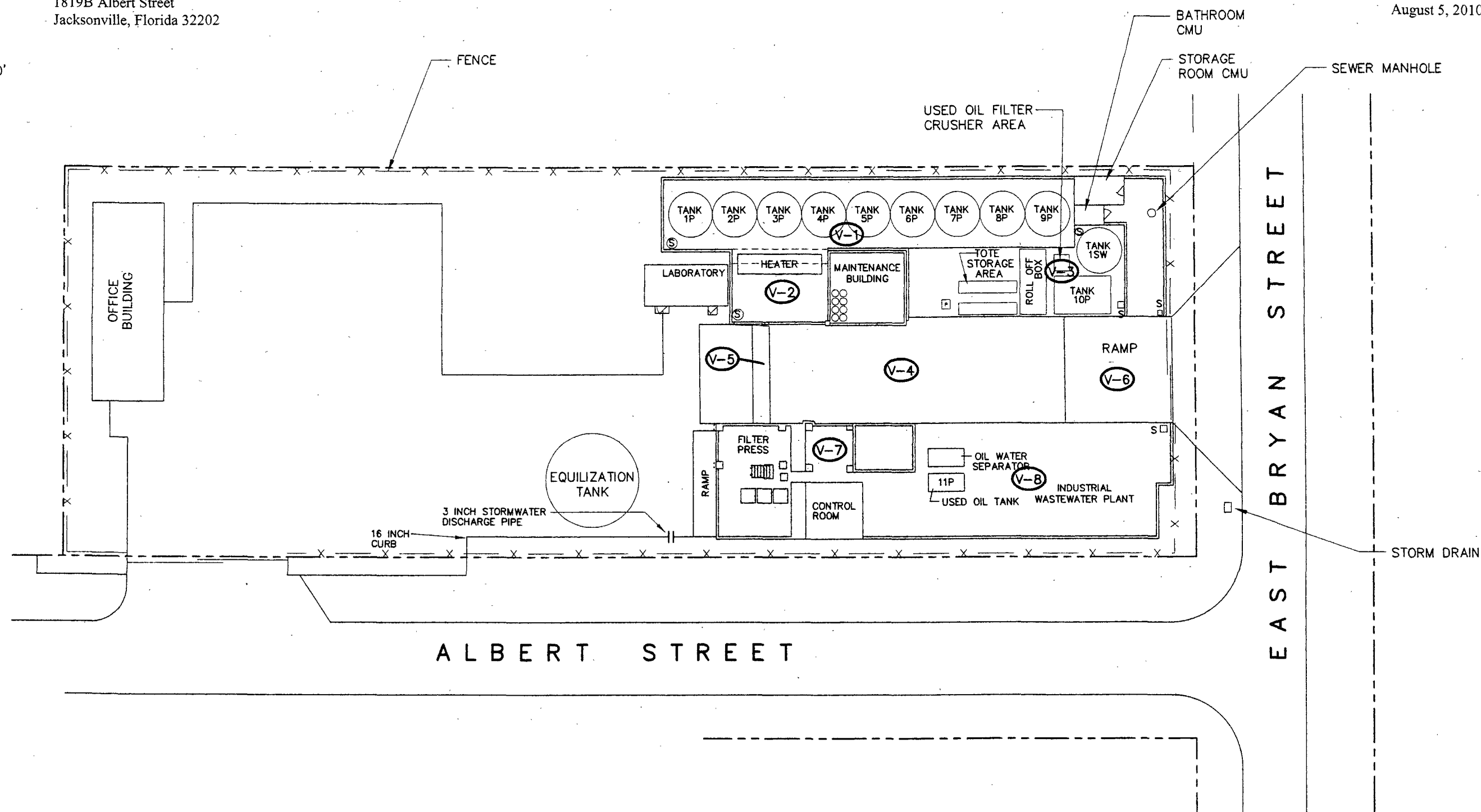
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APPROVED BY: TWR	DATE: 8/04/10
JOB NO. 4034	SCALE: 1"=30'
REVISED:	4034-7 DRAWING NO.



SCALE: 1" = 30'

USED OIL PERMIT
WATER RECOVERY, LLC
1819B Albert Street
Jacksonville, Florida 32202

Page 42 of 59
Revision 2
August 5, 2010



LEGEND



VOLUME SECONDARY CONTAINMENT
AREA NUMBER 1



AREA NOT USED IN SECONDARY CONTAINMENT
VOLUME CALCULATION

FIGURE 5 - SECONDARY CONTAINMENT CALCULATION AREA

PREPARED FOR:
WATER RECOVERY, LLC
1819 ALBERT STREET
JACKSONVILLE, FL 32202

PREPARED BY:
ENVIRONEERING, INC.
1735 EMERSON STREET, SUITE 3
JACKSONVILLE, FL 32207
904-665-0100

CHECKED BY: TWR
APPROVED BY: TWR
JOB NO. 4034
REVISED:

DRAWN BY: GCR
DATE: 8/04/10
SCALE: 1"=30'
4034-8
DRAWING NO.

APPENDIX B

Petroleum Spill Report Record

PETROLEUM SPILL REPORT RECORD

In the event of a spill of petroleum from this facility, the Water Recovery, LLC Spill Team Coordinator should be immediately contacted at: (904) 475-9320.

FACILITY NAME: Water Recovery, LLC

FACILITY LOCATION: 1819 B Albert Street, Jacksonville, FL 32202

DATE OF SPILL: _____ **DATE OF REPORT:** _____

TIME OF SPILL: _____ **TIME OF REPORT:** _____

NAME OF PERSON REPORTING SPILL _____

TYPE OF PETROLEUM SPILLED (Circle): Diesel / Contaminated Water / Used Oil

Other: _____

LOCATION AND ESTIMATED VOLUME OF SPILL (Refer to Facility Site Plan):

Pump Area: _____

Secondary Containment Area: _____

Estimated Volume: _____

Loading/Unloading Area: _____

Estimated Volume: _____

Other (Specify): _____

Estimated Volume: _____

Has spill breached secondary containment area? Yes _____ No _____

Estimated Volume: _____

Has petroleum entered a storm sewer? Yes _____ No _____

Estimated Volume: _____

SOURCE OF SPILL (Refer to facility Site Plan):

Petroleum Storage Tank: _____

Tank Truck Loading/Unloading Area: _____

Ancillary Equipment (Specify): _____

Pump Area: _____

AFFECTED MEDIUM (Circle): Soil / Water / Concrete / Other (Specify): _____

CAUSE OF SPILL: _____

DAMAGES OR INJURIES CAUSED BY SPILL: _____

ACTIONS BEING USED TO STOP, REMOVE, AND MITIGATE THE EFFECTS OF THE SPILL: _____

IS AN EVACUATION OF THE LOCAL AREA WARRANTED? Yes ____ No ____

INDIVIDUAL(S) AND ORGANIZATIONS CONTACTED (Note Date and Time of Notification):

OTHER PERTINENT INFORMATION: _____

APPENDIX C

Tank System Visual Inspection Checklist
Tank System Activity Log

WATER RECOVERY, LLC - Tank System Visual Inspection Checklist													
YEAR: 1819 B ALBERT STREET - JACKSONVILLE FLORIDA													
GENERAL DESCRIPTION	JANUARY DATE	FEBRUARY DATE	MARCH DATE	APRIL DATE	MAY DATE	JUNE DATE	JULY DATE	AUGUST DATE	SEPTEMBER DATE	OCTOBER DATE	NOVEMBER DATE	DECEMBER DATE	
UST OR AST													
CAPACITY (GALLONS)													
TANK CONTENTS													
CHECKLIST ITEMS													
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?													
2. If tank certificate of registration is required to be posted, is certificate posted?													
3. Are tank system components properly painted or identified?													
4. If tank system Alarm Panel exists, is panel powered and not in Alarm or System Failure condition?													
5. Is tank system Spill Kit on site?													
6. Is tank system Spill kit properly stocked?													
7. Is Spill Kit readily available and in designated location?													
8. Access to fill components locked or otherwise secured?													
9. Is tank surface free of dents, pits, cracks, rust or other damage?													
10. Is tank piping free of dents, pits, cracks, rust or other damage?													
11. No evidence of leakage around piping flanges, elbows and other fittings?													
12. Are piping sumps clear and unobstructed?													
13. Are Manway area free of product and other debris?													
14. Is secondary containment structure intact with drain valves closed?													
COMMENTS:													

WATER RECOVERY, LLC - Tank System Visual Inspection Checklist												
YEAR: 1819 B ALBERT STREET - JACKSONVILLE FLORIDA												
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
15. No evidence of leakage around piping flanges, elbows and other fittings on day tank?												
16. No suspicious or unusual petroleum odors are present in the tank system area?												
17. No signs of distressed vegetation that could be the result of a petroleum release?												
18. Are manway/manhole covers in place correctly?												
19. If present are monitoring well and/or soil vapor well locked or other wise secured?												
20. SPCC Plan on site and in proper location?												
21. Alarms (float sensor, optical sensors) in correct position?												
22. Alarm wiring in good condition (not loose or frayed)?												
23. Security fence intact?												
24. Security lighting working properly?												
INSPECTOR'S INITIALS												
COMMENTS:												
Note: All releases, spill or leaks of Petroleum product over 25 gallons must be reported to the FDEP by the Spill manager.												

Water Recovery, LLC

USED OIL PERMIT
WATER RECOVERY, LLC
1819B Albert Street
Jacksonville, Florida 32202

DATE & INITIALS	Type of Activity		EXPLANATION
	Alarm Verification	Alarm Incidents & Results	
	Tank Malfunctions	Tank Repairs	
	Piping Malfunctions	Piping Repairs	
	Routine Maintenance	Tank System Modification	
	Monitor Repair	Tank Tightness Testing by Vendor	
	Tank System Alarm Panel	Other	
	Leak/Spill		
	Alarm Verification	Alarm Incidents & Results	
	Tank Malfunctions	Tank Repairs	
	Piping Malfunctions	Piping Repairs	
	Routine Maintenance	Tank System Modification	
	Monitor Repair	Tank Tightness Testing by Vendor	
	Tank System Alarm Panel	Other	
	Leak/Spill		
	Alarm Verification	Alarm Incidents & Results	
	Tank Malfunctions	Tank Repairs	
	Piping Malfunctions	Piping Repairs	
	Routine Maintenance	Tank System Modification	
	Monitor Repair	Tank Tightness Testing by Vendor	
	Tank System Alarm Panel	Other	
	Leak/Spill		

Record and activity regarding the fuel tank and/or piping that cannot be recorded or explained on the Monthly Tank System Visual Inspection Checklist.

Page 49 of 59
Revision 2
August 5, 2010

1. Write the date and your initials in Column 1.
2. Mark the appropriate box in Column 2.
3. Explain in detail whatever occurred, whatever you did and whatever you found during inspections.

TANK SYSTEM ACTIVITY LOG
<WRIACTIVITYLOG-SPCC-3668-4>

APPENDIX D

Secondary Containment Fluid Removal Record

SECONDARY CONTAINMENT FLUID REMOVAL RECORD

Water Recovery, LLC
1819B Albert Street
Jacksonville, Florida 32202

LOCATION: _____

DATE: _____

TIME: _____

OPERATOR: _____

ACCUMULATED FLUID (Circle): Diesel / Water / Used Oil / Other (Specify): _____

APPROXIMATE VOLUME OF FLUID: _____

SOURCE OF ACCUMULATED FLUID: _____

APPEARANCE OF FLUID PRIOR TO REMOVAL (Color, Sheen, Etc.): _____

ACTION TAKEN PRIOR TO REMOVAL OF PETROLEUM: _____

DESCRIBE ANY WASTES GENERATED (Volume, Disposal, Etc.): _____

**REMOVAL OF INDUSTRIAL WASTEWATER MUST BE IN ACCORDANCE WITH
SECTIONS 3.4 & 4.2.2 OF MANAGEMENT PROCEDURES 4700 & 4600, RESPECTIVELY.**

DESCRIBE ANY WASTES GENERATED (Volume, Disposal, Etc.): _____

COMMENTS: _____

Oil and Grease Scan does not exceed 5 ppm Yes / No - **CIRCLE ONE AND ENCLOSE
ANALYTICAL RESULTS, IF NO IS CIRCLED HAVE INDUSTRIAL WASTEWATER
SENT TO A PERMITTED PRETREATMENT FACILITY FOR PROCESSING.**

APPENDIX E

Record of Revision to SPCC Plan

RECORD OF REVISION TO SPCC PLAN

WATER RECOVERY, LLC

1819 B Albert Street
Jacksonville, Florida 32202

DATE: _____ SECTION: _____

EXPLANATION: _____

DATE OF OPERATING PERSONNEL RE-TRAINING: _____

REVISIONS AMENDED IN ALL COPIES OF THIS SPCC PLAN? _____

WATER RECOVERY, INC. APPROVAL

NAME: _____

TITLE: _____

SIGNATURE: _____

PROFESSIONAL ENGINEER APPROVAL

NAME: _____

REGISTRATION STATE AND LICENSE NUMBER: _____

SIGNATURE: _____

NOTE:

- (1) SECTIONS MUST BE REPLACED WHEN AMENDING THIS SPCC PLAN.
- (2) RECORDS OF REVISIONS MUST BE MAINTAINED WITH THIS SPCC PLAN.

RECORD OF REVISION TO SPCC PLAN

WATER RECOVERY, LLC

1819 B Albert Street
Jacksonville, Florida 32202

DATE: August 5, 2010 SECTION: 1-13

EXPLANATION: _____

DATE OF OPERATING PERSONNEL RE-TRAINING: August 5, 2010

REVISIONS AMENDED IN ALL COPIES OF THIS SPCC PLAN? YES

WATER RECOVERY, LLC. APPROVAL

NAME: Steve Jenkins

TITLE: President

SIGNATURE: _____

PROFESSIONAL ENGINEER APPROVAL

NAME: Timothy W. Rudolph, P.E.

REGISTRATION STATE AND LICENSE NUMBER: FLORIDA - 39617

SIGNATURE: _____

NOTE:

- (1) SECTIONS MUST BE REPLACED WHEN AMENDING THIS SPCC PLAN.
- (2) RECORDS OF REVISIONS MUST BE MAINTAINED WITH THIS SPCC PLAN.



APPENDIX F

Facility Operating Personnel Training Record

FACILITY OPERATING PERSONNEL TRAINING RECORD

WATER RECOVERY, LLC
1819 B Albert Street
Jacksonville, Florida 32202

NAME: _____

DATE: _____

TITLE: _____

SECTIONS TRAINED: _____

COMMENTS: _____

**I HAVE COMPLETED THE INDICATED TRAINING AND FULLY UNDERSTAND
THE CONCEPTS, INTENTIONS, AND PROCEDURES OF THE SPCC PLAN. I
AGREE TO ABIDE, TO THE BEST OF MY ABILITY, BY THE CONCEPTS,
INTENTIONS, AND PROCEDURES OF THIS SPCC PLAN.**

EMPLOYEE SIGNATURE: _____

SPILL PREVENTION COORDINATOR: _____

TRAINER: _____

NOTE:

**(1) EMPLOYEE TRAINING RECORDS RELATING TO PETROLEUM POLLUTION
PREVENTION MUST BE MAINTAINED WITH THE FACILITY SPCC PLAN.**

FACILITY OPERATING PERSONNEL TRAINING RECORD

WATER RECOVERY, LLC
1819 B Albert Street
Jacksonville, Florida 32202

NAME: _____

DATE: _____

TITLE: _____

SECTIONS TRAINED: _____

COMMENTS: _____

**I HAVE COMPLETED THE INDICATED TRAINING AND FULLY UNDERSTAND
THE CONCEPTS, INTENTIONS, AND PROCEDURES OF THE SPCC PLAN. I
AGREE TO ABIDE, TO THE BEST OF MY ABILITY, BY THE CONCEPTS,
INTENTIONS, AND PROCEDURES OF THIS SPCC PLAN.**

EMPLOYEE SIGNATURE: _____

SPILL PREVENTION COORDINATOR: _____

TRAINER: _____

NOTE:

**EMPLOYEE TRAINING RECORDS RELATING TO PETROLEUM POLLUTION
PREVENTION MUST BE MAINTAINED WITH THE FACILITY SPCC PLAN.**

FACILITY OPERATING PERSONNEL TRAINING RECORD

WATER RECOVERY, LLC
1819 B Albert Street
Jacksonville, Florida 32202

NAME: _____

DATE: _____

TITLE: _____

SECTIONS TRAINED: _____

COMMENTS: _____

**I HAVE COMPLETED THE INDICATED TRAINING AND FULLY UNDERSTAND
THE CONCEPTS, INTENTIONS, AND PROCEDURES OF THE SPCC PLAN. I
AGREE TO ABIDE, TO THE BEST OF MY ABILITY, BY THE CONCEPTS,
INTENTIONS, AND PROCEDURES OF THIS SPCC PLAN.**

EMPLOYEE SIGNATURE: _____

SPILL PREVENTION COORDINATOR: _____

TRAINER: _____

NOTE:

- (1) EMPLOYEE TRAINING RECORDS RELATING TO PETROLEUM POLLUTION
PREVENTION MUST BE MAINTAINED WITH THE FACILITY SPCC PLAN.**

APPENDIX G

Record of SPCC Plan Review

WATER RECOVERY, LLC.

Memorandum for the Record

By: (INSERT NAME HERE), WATER RECOVERY, LLC

Date: (INSERT DATE HERE)

Re: FIVE (5) YEAR SPCC COMPLETE REVIEW.

FIVE (5) YEAR SPCC COMPLETE REVIEW

I have completed review and evaluation of the SPCC Plan for Water Recovery, LLC on (INSERT DATE HERE), and will (will not) amend the Plan as a result

(INSERT NAME)
Plant Manager

< MEMO FOR THE RECORD WRI-ENVIRONEERING-SPCC-3668-1.doc >

WATER RECOVERY, LLC

1819B Albert Street
Jacksonville, Florida 32202

USED OIL FACILITY CLOSURE PLAN

MANAGEMENT PROCEDURE 4800

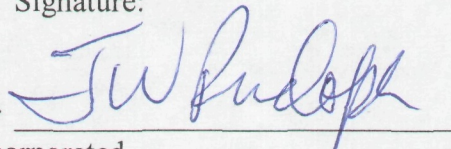
REVISION: 2

<4800TP-2-1.DOC>

Prepared By:

T.W. Rudolph, P.E.
Environmental Engineer
ENVIRONEERING, Incorporated

Signature:



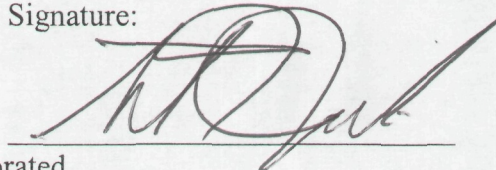
Date:

8/5/10

Approved By:

S.T. Jenkins
President
Water Recovery, Incorporated

Signature:



Date:

8/26/10

<4800TP-2-1-1-1.DOC>

TABLE OF CONTENTS

	<u>PAGE</u>
1.0 CLOSURE PLAN FOR WRI USED OIL FACILITY	1
2.0 FACILITY DESCRIPTION.....	1
3.0 CLOSURE PERFORMANCE STANDARD	2
4.0 SCHEDULE FOR CLOSURE EVENTS	2
5.0 TIME ALLOWED FOR CLOSURE [9(a)]*	2
6.0 EXTENSIONS FOR CLOSURE TIME	3
7.0 PARTIAL CLOSURE AND FINAL CLOSURE ACTIVITIES.....	3
7.1 Closure Activities	4
7.1.1 environmental closure cost estimate and management approval.....	4
7.1.2 notification.....	4
7.1.3 preclude receipt of materials	4
7.1.4 research.....	4
7.1.5 maximum waste inventory	5
7.1.6 inspection.....	5
7.1.7 inventory disposal, removal or equipment decontamination [9(b)]	5
7.1.8 decontamination procedures [9(c)].....	7
7.1.8.1 tanks and piping.....	7
7.1.8.2 containers.....	7
7.1.8.3 equipment	8
7.1.8.4 process areas	9
7.1.9 sampling and analysis methods [9(d)]	9
7.1.10 waste removal	10
7.1.10.1 solid waste [9(e)]	11
7.1.10.2 liquid waste [9(f)]	12
7.1.11 soil sampling [9(g)]	12
7.1.12 groundwater sampling [9(g)(i)]	13
7.1.13 minimum sampling quantities	14
7.1.14 post-closure monitoring [9(g)(ii)].....	14
7.2 FDEP Above Ground Storage Tank Systems Closure Requirements.....	16

* FDEP Used Oil Processing Facility Permit Application Form and Instructions Operating Information Paragraph Number

List of Tables

	<u>PAGE</u>
Table 1. Closure Action Items	6
Table 2. Analysis parameters and Methods	10
Table 3. WRI Used Oil Tank Capacity	11
Table 4. Minimum Sample Quantities	14

List of Figures

- Figure 1. WRI Used Oil Facility Site Plan
- Figure 2. Closure Sampling Locations

1.0 WRI USED OIL FACILITY CLOSURE PLAN

This used oil closure plan will be used throughout the facility life to help ensure the facility may be clean closed at the end of its useful life. The facility is planned for conversion to a commercial storage facility at the end of used oil storage activities. Waste accepted by the facility must be properly classified, profiled and approved according to WRI Management Procedures 4200. WRI procedures require used oil to be handled, transported, labeled, marked, treated and disposed of in accordance with current federal, state and local regulations. A complete waste inventory will be maintained throughout the facility life. Waste profile records with supporting analytical data or material safety data sheets, if necessary, will be maintained as well.

The analytical methods that are listed in this plan are intended to be updated with the equivalent methods at the time of closure. The sampling and analytical methods to be used at the facility closure must be in accordance with the most up to date version of SW 846 and the intent of this closure plan. Changes in the SW 846 analytical method numbers are anticipated and will not require this closure plan to be revised prior to implementation.

The used oil closure work under this permit will be completed by the facility operator, Water Recovery, LLC (WRI) independently of the closure activities to be accomplished by the facility owner that are required as a result of previous operations.

2.0 FACILITY DESCRIPTION

The WRI Used Oil Facility is constructed in the area shown by Figure 1 in Jacksonville, Florida. The concrete surfaces of the secondary containment area and the surrounding secondary containment area will be completely sealed with epoxy to prevent contaminants from entering the pores and causing extensive closure efforts.

Used oil transfer operations will occur only within the sumped work area identified by Figure 1. Used oil tanks that show visual signs of leakage will have the contents transferred to another tank. The leak will be repaired before the tank is placed back into service. Surfaces that come in contact with the used oil will be completely decontaminated. Daily cleanup will be verified by visual observation on secondary containment surfaces.

The facility is constructed from concrete, steel and various paints and coatings.

3.0 CLOSURE PERFORMANCE STANDARD

The WRI Used Oil Processing Facility will be closed in a manner which will eliminate, control or at least minimize, to the extent necessary to prevent threats to human health the environment, escape of used oil, contaminated rainfall or waste decomposition products to the atmosphere, groundwater, surface water and the surrounding lands. Additionally, closure activities will be conducted in a manner that will eliminate or minimize the need for post-closure maintenance.

The WRI Used Oil Facility will remain in operation until the end of its economic life. The facility is planned for clean closure at the end of its useful life. The facility will be operated with the management motto "DO NOT SPILL SO MUCH AS ONE DROP." The used oil received by the facility will be in structurally sound shipping containers without any residue on the container exterior. Best available management practices will be used to minimize future closure activities.

4.0 SCHEDULE FOR CLOSURE EVENTS

There are no plans to close the WRI Used Oil Facility at any time in the known future. Should a date for closure be anticipated any time in the future, this plan will be amended.

5.0 TIME ALLOWED FOR CLOSURE [9(a)]

The day closure activities are completed is "D" Day.

A. Environmental Closure Cost Estimate

Complete preparation	D-300 days
Facility EPC approval (EPC – Environmental Protection Committee)	D-290 days
WRI President approval	D-285 days

B. Notify FDEP of proposed closure D-270 days

C. Last receipt of waste D-180 days

D. Begin closure activities D-150-180 days (within 30
days of last receipt of waste)

E. Complete waste inventory removal	D-90 days
F. Request for Chemical Analysis inventory removal)	D-90 days (after waste
G. Start area cleanup analysis)	D-90 days (after chemical
H. Complete area cleanup	D-30 days
I. Complete area inspection	D-15 days
J. Request for Compliance Analysis	D-15 days (after area inspection)
K. Closure facility	D-10 days
L. Certify closure to FDEP	D-10 days
M. Transmit facility records including closure correspondence and reports to Staff Environmental Coordinator.	D-day
N. Report closure to Real Estate and Cost Accounting.	D-day

6.0 EXTENSIONS FOR CLOSURE TIME

Provisions have been amended to extend the closure period, depending upon the circumstances, by FDEP. Should extenuating circumstances prevail or a requirement for amending the closure plan be realized, FDEP will be petitioned by the owner or operator for special consideration under these provisions.

A request for closure extension is not anticipated at the present time.

7.0 PARTIAL CLOSURE AND FINAL CLOSURE ACTIVITIES

The WRI Used Oil Facility will support the military, marine and commercial sectors. Considering business planning, there is no indication that this facility will be closed in the known future. Current business planning shows activities that extend until the Year 2099. Should this facility require closure, the following actions will be taken to

ensure the storage area has been closed in accordance with the Florida Department of Environmental Protection (FDEP) regulations.

7.1 Closure Activities

When the decision to close this facility has been finalized, the following actions will be taken:

7.1.1 environmental closure cost estimate and management approval

An Environmental Closure Cost Estimate (ECCE) will be prepared for management approval on the WRI Used Oil Facility prior to relocation or closure. WRI will notify FDEP at least 270 days before the date the facility closure is expected to begin. The FDEP notification will include transmittal of this closure plan.

7.1.2 notification

A letter of intent to close a used oil storage site will be forwarded to the Regional Administrator, State of Florida, Department of Environmental Protection. This letter will be transmitted at least 270 days prior to the beginning of closure activities by the operator.

7.1.3 preclude receipt of materials

Stop delivery and receipt of used oils at the facility. Divert any additional wastes to another permitted facility.

7.1.4 research

WRI compliance personnel will conduct a record search and on-site inspection to determine:

- 1) Maximum inventory of wastes in the storage facility
- 2) If any accidental releases had occurred
- 3) If any waste residues exist
- 4) The need for decontamination and/or area cleaning
- 5) Oldest accumulated waste on-site; and
- 6) Dates for completion of various closure activities utilizing Section 5.0 Time Allowed for Closure, of this plan.

7.1.5 maximum waste inventory

The maximum waste inventory that can be in storage at any time is limited to the volume of above ground storage tanks, drums and roll off boxes.

7.1.6 inspection

The facility operator will arrange for site inspections to be conducted by a registered professional environmental engineer to verify that the facility is being and has been closed in accordance with the closure plan, and FDEP requirements. The engineer shall inspect the facility several times during the closure to assure that closure activities are in compliance with the approved closure plan. The engineer will provide written certification to FDEP and WRI that the closure requirements of this plan have been met. The certification shall bear the engineer's signature, date of certification and stamp.

7.1.7 inventory disposal, removal or decontamination of equipment [9(b)]

The criterion for determining the need for decontamination will be based on visual or physical and chemical analysis of the item, including the equipment and the surrounding soils. Items that are visually contaminated will be decontaminated without the need for any prior physical or chemical analysis. Facility equipment includes the gauging rod, mixer, heater and the facility pump. The tank contents and residuals are to be removed and disposed of in accordance with section 7.1.10. The tanks and piping will be recycled as scrap metal after being decontaminated. Concrete will be decontaminated and sent to permitted solid waste landfill. Contaminated soil, if present, will be removed and treated at a permitted facility or will be placed into a permitted landfill. The tanks, piping, equipment and items that will be cleaned or closed are listed in Table 1. The tanks and associated piping are plumbed to the main pump. There are cross connections between the pipes. Each tank and the associated piping will be cleaned or closed as a single units. Equipment that has been in contact with used oil will be rinsed at least one time for decontamination.

Table 1. Closure Action Items

<u>ITEM NUMBER</u>	<u>DESCRIPTION</u>	<u>FINAL ACTION</u>
1	TANK #1	DECONTAMINATE AND RECYCLE
2	TANK #2	DECONTAMINATE AND RECYCLE
3	TANK #3	DECONTAMINATE AND RECYCLE
4	TANK #4	DECONTAMINATE AND RECYCLE
5	TANK #5	DECONTAMINATE AND RECYCLE
6	TANK #6	DECONTAMINATE AND RECYCLE
7	TANK #7	DECONTAMINATE AND RECYCLE
8	TANK #8	DECONTAMINATE AND RECYCLE
9	TANK #9	DECONTAMINATE AND RECYCLE
10	TANK #10	DECONTAMINATE AND RECYCLE
11	TANK # 11	DECONTAMINATE AND RECYCLE
12	OIL WATER SEPARATOR	DECONTAMINATE AND RECYCLE
13	PIPING	DECONTAMINATE AND RECYCLE
14	CONCRETE	DECONTAMINATE AND DISPOSE
15	MANUAL GAUGE	DECONTAMINATE AND DISPOSE
16	MIXER	DECONTAMINATE AND RECYCLE
17	HEATER	DECONTAMINATE AND RECYCLE
18	FACILITY PUMP	DECONTAMINATE AND RECYCLE
19	CONTAINERS	DECONTAMINATE AND RECYCLE
20	SOIL	TREATMENT/LANDFILL
21	GROUNDWATER	TREATMENT
22	TANK SW-1	DECONTAMINATE AND RECYCLE

Used oil is not currently stored in containers at the facility. Used oil may be brought into the facility in containers for small quantity generators. Containers will be emptied, decontaminated and disposed of as solid waste for closure.

7.1.8 decontamination procedures [9(c)]

The items that are contaminated at closure will be cleaned using a commercial detergent solution mixed in accordance with the manufactures' instructions. The items will also be cleaned with a high-pressure water spray that may be elevated to a suitable cleaning temperature.

7.1.8.1 tanks and piping

The tank contents and residuals are to be removed and disposed of in accordance with section 7.1.10. The tanks and associated piping are plumbed to the main pump. There are cross connections between the pipes. The tank interior and external surfaces will be decontaminated using a high-pressure water spray with an industrial cleaner elevated to a suitable temperature. The cross connections in the piping will be severed and cleaned into the main line. The severed connection will be plugged or capped until the entire pipe section is decontaminated. The piping will be pigged and cleaned using a hydroblaster. WRI will decontaminate used oil residues in the tanks and associated piping. The tanks and piping will be cleaned to remove the sludge, product, vapors and the visual signs of contamination. The wastes from the tanks and from the tank cleaning process will be properly characterized and disposed.

The rinse and cleaning water will be stored in a portable 20,000-gallon frac tank. The cleaning water will be consolidated from the various cleaning operations for sampling, waste classification and disposal. The cleaning and rinse water will be analyzed for the section 7.1.9 parameters.

A clearance rinse water sample will be obtained from each tank. The tank clearance samples will be analyzed for the section 7.1.9 parameters to demonstrate clean closure.

7.1.8.2 containers

The container contents and residuals are to be removed and disposed of in accordance with section 7.1.10. Used oil is not currently stored in containers at the facility. Used oil may be brought into the facility in containers for small quantity generators in the future. Containers

will be emptied, decontaminated and disposed of as solid waste or recycled for closure. Used oil containers will be stored in secondary containment.

The interior and external surfaces of each container will be decontaminated in a temporary sumped decontamination unit lined with two layers of six-mil polyethylene sheeting using a high-pressure water spray and industrial cleaner at a suitable temperature. Empty containers at the facility at closure will be decontaminated as well. The containers will be emptied of material, including fluids and sludge and cleaned. The containers will be cleaned to the degree to where they meet the empty container standards under 40 CFR 261.7 and then recycled as scrap metal.

The rinse and cleaning water will be stored in a portable 20,000-gallon frac tank. The cleaning water will be consolidated from the cleaning operations for sampling, waste classification and disposal. The cleaning and rinse water will be analyzed for the section 7.1.9 parameters.

7.1.8.3 equipment

The facility pump and external surfaces and the manual gauge, mixer and heater exterior surfaces will be decontaminated using a high-pressure water spray with an industrial cleaner elevated to a suitable temperature. The gauge will be disposed of after the first cleaning since it is made of wood that is soaked with oil. The mixer will have the exterior surface decontaminated and will be sold as a product or recycled as scrap metal. The natural gas heater will have the heat exchanger coils decontaminated and will be sold as a product. The heat transfer oil will be drained from the unit into shipping containers. The heat transfer coils will be plugged and sold with the unit. The heat transfer oil will also be sold with the unit. The heater will be sold as scrap if it cannot be sold as a product. The interior of the coils will be decontaminated if the heater is to be sold as scrap metal. The heat transfer oil will be managed as used oil if the heater is scrapped. WRI will decontaminate used oil residues in the equipment. The equipment will be cleaned to remove the sludge, product, vapors and the visual signs of contamination. The wastes from the equipment and from the equipment cleaning process will be properly characterized and disposed.

The rinse and cleaning water will be stored in a portable 20,000-gallon frac tank. The cleaning water will be consolidated from the various cleaning operations for sampling, waste classification and disposal. The cleaning and rinse water will be analyzed for the section 7.1.9 parameters.

7.1.8.4 process areas

The process areas' surfaces will be decontaminated using a high-pressure water spray with an industrial cleaner at a suitable temperature. The concrete may be left in place or will be disposed of if it is to be removed. WRI will decontaminate used oil residues in the sump, transfer area, and containment areas. The process areas will be cleaned to remove the sludge, product, vapors and the visual signs of contamination. The wastes from these areas and from the cleaning of these areas will be properly characterized and disposed.

The rinse and cleaning water will be stored in a portable 20,000-gallon frac tank. The cleaning water will be consolidated from the various cleaning operations for sampling, waste classification and disposal. The cleaning and rinse water will be analyzed for the section 7.1.9 parameters.

7.1.9 sampling and analysis methods [9(d)]

The methods used for closure sampling and analysis will be consistent with the requirements in Florida Administrative Code (FAC) 62-160. Procedures listed in the below four references will be used as long as the method is equivalent to that listed in EPA Methods SW-846. The analysis must be accordance with the analytical methods specified in EPA Methods SW-846 or equivalent. The method selected for analysis of closure samples will have the lowest method reporting level possible.

- A. US-EPA, Region IV, Environmental Services Division, Environmental Compliance Branch Standard Operating Procedures and Quality Assurance Manual, February 1, 1991, (ECBSOPQAM).
- B. FDEP, Quality Assurance Section, Standard Operating Procedures for Laboratory Operations and Sample Collection Activities. DER QA-001/92, September 30, 1992.
- C. US-EPA, Research and Development, Samplers and Sampling Procedures for Hazardous Waste Streams, January 1980, EPA-600/2-80-018.

D. US-EPA, Office of Solid Waste, Waste Analysis Plans A Guidance Manual, October 1984, EPA/630-SW-84-012.

Rinse water, soil, oil and ground water samples will be analyzed for the following parameters and by the method indicated as shown in Table 2.

Table 2. Analysis Parameters and Methods.

Description	EPA Method
RCRA Metals	6010/7470
Total Recoverable Petroleum Hydrocarbons	8015/FL-PRO
Volatile Aromatics	8021/8260
Phenols	8041
Purgeable Organics	8260
Base Neutrals/Acid Extractables	8270
Total Organic Halogens	9020

7.1.10 waste removal

The WRI Plant Manager will arrange with an approved company to transport and dispose of any wastes at an off-site location. The WRI Plant Manager will maintain appropriate logs, manifests and records.

Waste classifications will be made in accordance with F.A.C. 62-730 and 40 CFR Part 262. Hazardous waste will not be disposed of on-site. The hazardous waste will be shipped off-site to a permitted treatment, storage and disposal facility by a licensed hazardous waste transporter. Hazardous waste shipments will be completed with proper haulers who are licensed as a hazardous waste transporter. The waste containers will have the required labels and markers. The WRI facility will not accept hazardous waste into the facility. The generation of hazardous waste during closure activities is not anticipated since the facility will only manage nonhazardous waste used oil during operation.

The used oil tanks are listed in Table 3. for closure action with their respective capacities. The tank number and the tank contents of each tank are also listed in Table 3.

Table 3. WRI Used Oil Tank Capacity

<u>TANK NUMBER</u>	<u>CAPACITY (GALLONS)</u>	<u>CONTENTS</u>
1P	23,232	USED OIL
2P	23,232	USED OIL
3P	23,232	USED OIL
4P	21,445	USED OIL
5P	20,778	USED OIL
6P	25,806	USED OIL
7P	21,446	Industrial Wastewater/ Petroleum Product
8P	21,446	Industrial Wastewater/ Petroleum Product
9P	20,833	Industrial Wastewater/ Petroleum Product
10P	10,000	USED OIL
11P	500	USED OIL
SW1	30,000	STORMWATER

There will be no need for further facility maintenance because the used oil will have been removed from the facility at the completion of the closure process. Used oil will not contaminate surface or ground water at the facility. Soils will be free of oil and equipment will be emptied and cleaned or dismantled. The facility is operated under a policy of not spilling so much as one drop of used oil on the ground to prevent soil and ground water contamination from occurring.

7.1.10.1 solid waste [9(e)]

Contaminated soils, concrete, sludges and decontaminated containers and equipment will be removed and placed into D.O.T. open top containers, roll off boxes or dump trailers for disposal off-site. The contaminated soil will be replaced by clean soil obtained from an acceptable source.

7.1.10.2 liquid waste [9(f)]

Used oil, water and sludges will be removed and placed into D.O.T. open top containers, frac tanks or tanker trucks for disposal off-site.

7.1.11 soil sampling [9(g)]

Surface soils will be sampled at ten locations to determine if any contamination to the land has occurred as shown in Figure 2. Samples will be obtained from two vertical points at each sampling location. The two samples for each location will be obtained from 0-6 inches and 6-24 inches below the land surface. The soil samples will be obtained in accordance with EPA SW 846 Methods. A total of twenty samples will be obtained. The soil samples will be analyzed for the following parameters using the EPA method indicated:

<u>Description</u>	<u>EPA Method</u>
RCRA Metals	6010/7470
Total Recoverable Petroleum Hydrocarbons	8015/FL-PRO
<u>Description</u>	<u>EPA Method</u>
Volatile Aromatics	8021/8260
Phenols	420.1
Purgeable Organics	8260
Base Neutrals/Acid Extractables	8270
Total Organic Halogens	9020

The analytical parameters may be modified to include only constituents stored by the Used Oil Facility by amendment procedures. The analytical parameter list may also be modified to reflect changes in city, state or federal law.

If analytical results from soil sampling indicate presence of impacted soil, additional soil samples may be collected to define the extent of impacted soils for remediation purposes. The additional soil samples will be analyzed for those parameters previously found on the site.

The soil sampling portion of this closure plan may be revised at the time of closure to sample for as few as ten soil samples based upon past spill history at the facility.

7.1.12 ground water sampling [9(g)(i)]

The groundwater will not be assessed if no soil contamination is detected from the soil sampling activities in Section 7.1.11. The groundwater will be assessed if soil contamination is identified. The location and quantity of groundwater monitoring wells will be adjusted, if needed, at the time of the facility closure. The groundwater sampling identified in this section, would be a maximum anticipated work event.

Ground water will be sampled at four locations to determine if any contamination to the land has occurred as shown in Figure (2). Samples will be obtained from each of the three existing monitoring wells and one new shallow monitoring well location. The existing shallow monitoring wells to be used in the ground water sampling are MW-12, MW-13 and MW-14. These ground water samples will be obtained from each well using a peristaltic pump for low flow purging as a quiescent sampling method. The ground water samples will be obtained in accordance with EPA SW 846 Methods. A total of four samples will be obtained. The ground water samples will be analyzed for the following parameters using the EPA method indicated:

<u>Description</u>	<u>EPA Method</u>
RCRA Metals	6010/7470
Total Recoverable Petroleum Hydrocarbons	8015/FL-PRO
Volatile Aromatics	8021/8260
Phenols	8041
Purgeable Organics	8260
Base Neutrals/Acid Extractables	8270
Total Organic Halogens	9020

The analytical parameters may be modified to include only constituents stored by the Used Oil Facility by amendment procedures. The analytical parameter list may also be modified to reflect changes in city, state or federal law.

Ground water will be assessed beyond the four monitoring wells if the contaminated soil can't be removed physically or economically. The ground water assessment will be completed in accordance with current city, state and federal law. Sampling activities will be completed in accordance with the methods found in SW-846 for the above parameters.

If analytical results from groundwater sampling indicate presence of impacted groundwater in samples from the four wells, additional groundwater samples may be collected to define the extent of petroleum hydrocarbons for remediation purposes. The additional groundwater samples will be analyzed for those parameters previously found on the site.

The site currently has historical groundwater monitoring activities that have been ongoing. The existing groundwater monitoring wells may be used for closure activities.

7.1.13 minimum sample quantities

The minimum number of samples to be analyzed to complete closure in accordance with this plan is forty-two. This number is based upon the assumption that the decontamination actions will generate less than 20,000 gallons of cleaning and rinse water. Table 4 provides a breakdown of the sampling items to be completed.

Table 4. Minimum Sample Quantities

<u>DESCRIPTION</u>	<u>MEDIA</u>	<u>QUANTITY</u>
CLEARANCE RINSE WATER	LIQUID	18
GROUND WATER	LIQUID	4
SOIL	SOLID	20
TOTAL		42

7.1.14 post-closure monitoring [9(g)(ii)]

The WRI Used Oil Facility is not expected to require monitoring after closure. Any condition that might have presented a potential contamination to surface or groundwaters or a hazard to safety of personnel would have been contained, removed, returned to normal and reported at the time of the incident as per the WRI Hazardous Material Site Specific Contingency Plan (Management Procedure 3400). However, it is a duty of the post-closure inspector to specifically review the potential for possible future environmental hazards. The inspection report must specifically address the need for monitoring and either identify "none required," or specify the type and extent of post-closure

monitoring required. If a monitoring requirement is identified, it will be formalized in report form.

If soil or groundwater contamination is detected above current FDEP concentrations regulated under Chapter 62-710 F.A.C. the soil or groundwater will be remediated. The closure requirements of Chapter 62-710 F.A.C. references Chapter 62-761, which references Chapter 62-770. The clean up levels will be as stated in Chapter 62-770 F.A.C. which, references Chapter 62-777 F.A.C. Table I standard groundwater cleanup levels and Table II, residential direct exposure soil cleanup target levels or the alternative levels in 62-770.650 or 770.680 as applicable, or the petroleum standards applicable at the time of closure. Assessment and remediation procedures will follow Chapter 62-770 F.A.C. or the current equivalent rule and meet the approval of the FDEP. If impacted soil or groundwater can not be practically remediated then WRI will close the tank system in accordance with the closure-post-closure requirements of 40 CFR 264.310. These requirements are for hazardous waste landfills and may include the following:

Provide long-term minimization of migration of liquids through the closed used oil facility.

Function with minimum maintenance.

Promote drainage and minimize erosion or abrasion of the cover.

Accommodate settling and subsidence so that the cover's integrity is maintained.

Have a permeability less than or equal to the permeability of the natural subsoil's present.

The post closure requirements contained in 264.117 through 264.120 including maintenance and monitoring throughout the post-closure care period must be completed after final closure. The following must also be completed:

Maintain the integrity and effectiveness of the final cover, including making repairs to the cover as necessary to correct the effects of settling, subsidence, erosion or other events.

Maintain and monitor the leak detection system in accordance with 264.301(c)(3)(iv) and 264.304(b), and comply with the other applicable leak detection system requirements of 264 Subpart N.

Maintain and monitor the ground water monitoring system and comply with the other applicable requirements of 264 Subpart F.

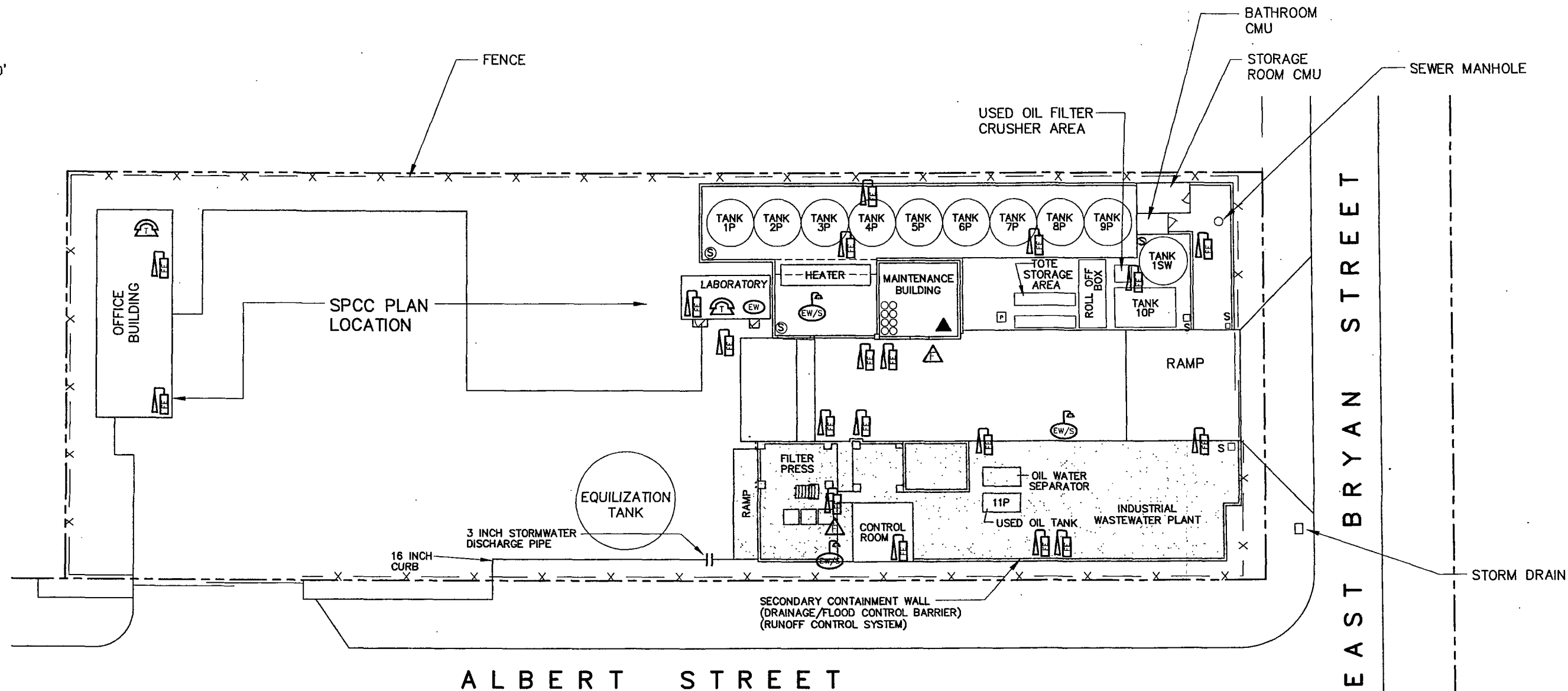
Prevent run-on and run-off from eroding or otherwise damaging the final cover. Protect and maintain surveyed benchmarks used in complying with 264.309.

7.2 FDEP Above Ground Storage Tank Systems Closure Requirements







The WRI Used Oil Facility above ground storage tank system will be closed in accordance with Florida Administrative Code (FAC) 62-761.800 Out of Service and Closure Requirements. These requirements are found in the FDEP Petroleum Storage Systems Regulations 62-761-800(2)(c). The current equivalent of this regulation will be implemented at the time of closure.



SCALE: 1" = 30'



LEGEND

- SPILL KIT
-  FIRE EXTINGUISHER
-  TELEPHONE
-  EMERGENCY EYEWASH/SHOWER
-  EMERGENCY SHOWER
-  FIRE ALARM / AIR HORN
-  DECONTAMINATION SUPPLIES

TANK NUMBER	CAPACITY (GALLONS)	CONTENTS OF TANK
1P	23,232	USED OIL
2P	23,232	USED OIL
3P	23,232	USED OIL
4P	21,445	USED OIL
5P	20,778	USED OIL
6P	25,806	USED OIL
7P	21,446	PETROLEUM CONTACT WATER
8P	21,446	INDUSTRIAL WASTEWATER/ PETROLEUM PRODUCTS
9P	20,833	INDUSTRIAL WASTEWATER/ PETROLEUM PRODUCTS
10P	10,000	INDUSTRIAL WASTEWATER
11P	500	USED OIL
SW1	30,000	STORMWATER

FIGURE 1 - WRI USED OIL FACILITY SITE PLAN - WRI-4200-1/4800-1/SPCC

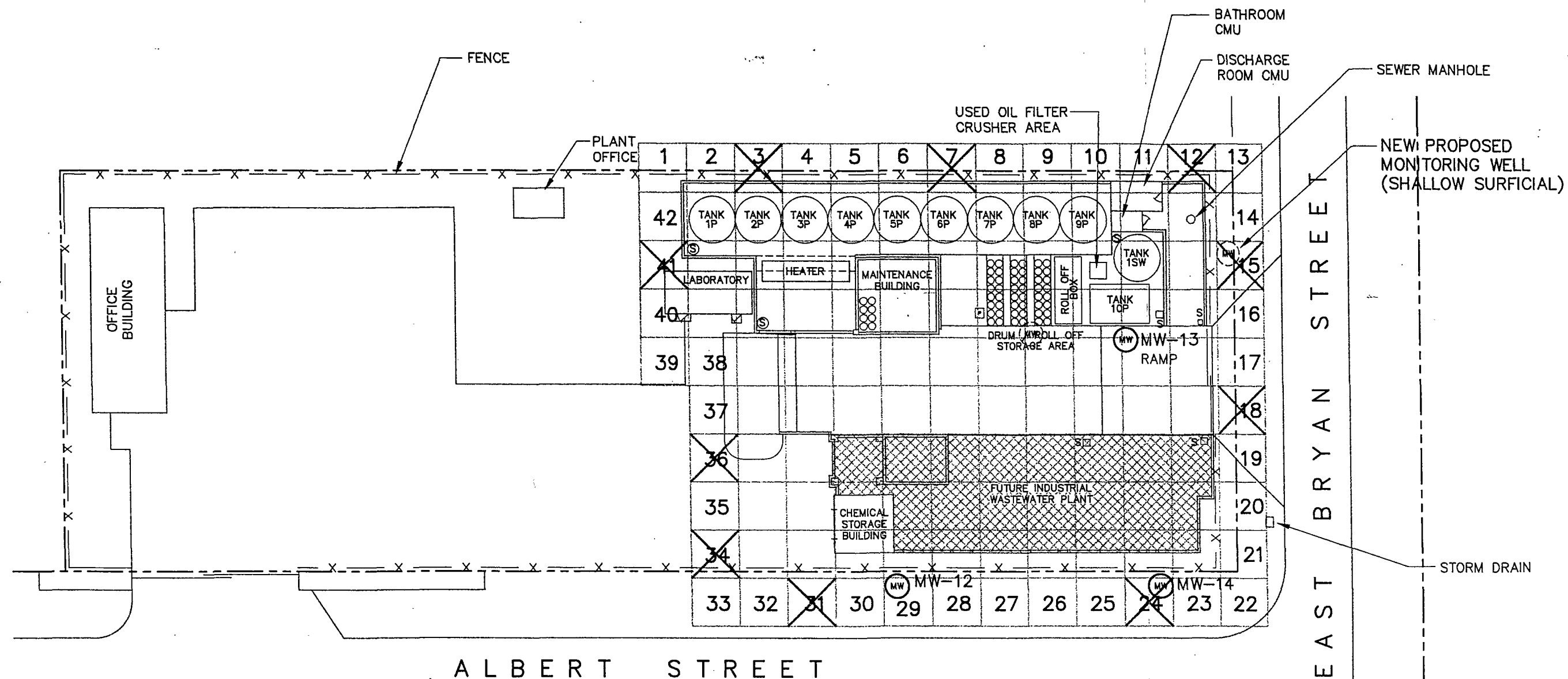
PREPARED FOR:
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PREPARED BY:
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APPROVED BY: TWR	DATE: 8/04/10
JOB NO. 4034	SCALE: 1"=30'
REVISED:	4034-2 DRAWING NO.



SCALE: 1" = 30'



LEGEND



SOIL SAMPLE LOCATION
0-6" BLS AND 6"-24" BLS



MONITORING WELL LOCATION EXISTING



NEW MONITORING WELL LOCATION

TWRudolph 6/20/00

FIGURE 2 - CLOSURE SAMPLING LOCATIONS - WRI-4800-2

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JOB NO. 1338	SCALE: 1"-30'
REVISED:	1338-5 DRAWING NO.

WATER RECOVERY, LLC

1819 Albert Street
Jacksonville, Florida 32202

UNIT MANAGEMENT PLAN

MANAGEMENT PROCEDURE 4700

REVISION: 2

<4700TP-4.WPS>

Prepared By:

Gregory G. Reynolds
Vice President and General Manager
Water Recovery, LLC

Signature:



Date:

8/26/10

Approved By:

Steven T. Jenkins
President
Water Recovery, LLC

Signature:



Date:

8/26/10

Table of Contents

	<u>Page Number</u>
1.0 INTRODUCTION [8].....	1
2 0 CONTAINERS [8(a)]	1
2 .1 Aisle Space [8(a)(i)]	1
2.2 Secondary Containment [8(a)(ii)].....	1
2.3 Inspections and Corrective Actions [8(a)(iii)]	2
3.0 TANKS [8(b)].....	2
3.1 Performance Standards [8(b)(i)]	2
3.2 Closure Plan [8(b)(ii)]	2
3.3 Inspection and Monitoring Plan [8(b)(iii))	3
3.3.1 Spill prevention responsibility	3
3.3.2 Spill prevention measure takes during transfer of petroleum	3
3.3.3 Inspections	4
3.3.3.1 Inspection responsibility	4
3.3.3.2 Inspection of used oil storage tank.....	4
3.3.3.3 Inspection of piping.....	4
3.3.3.4 Inspection of secondary containment areas.....	4
3.4 Released Material and Precipitation [8(b)(iv)].....	5
3.4.1 Secondary containment	5
3.4.2 Removal of water from secondary containment	5

FIGURE 1. HAZARDOUS MATERIALS STORAGE LOCATIONS

ENCLOSURE (1) WRI USED OIL TANK PICTURES
ENCLOSURE (2) SECONDARY CONTAINMENT CALCULATIONS
ENCLOSURE (3) USED OIL WEEKLY INSPECTION CHECK LIST
ENCLOSURE (4) TANK SYSTEM VISUAL INSPECTION CHECK LIST
ENCLOSURE (5) TANK SYSTEM ACTIVITY LOG
ENCLOSURE (6) SECONDARY CONTAINMENT FLUID REMOVAL RECORD

1.0 INTRODUCTION [8]

This Water Recovery, LLC Management Procedure 4700 is the unit management plan for the used oil processor permit application Section C. Part 8. Water Recovery, LLC (WRI) will conduct business in accordance with this unit management plan when handling used oil.

The WRI used oil tanks are properly labeled with the words "Used Oil" as shown by enclosure (1). Tank 7P is designated and labeled for "PCW" service. The used oil tanks are labeled "Used Oil" or "PCW" in contrasting colors.

2.0 CONTAINERS [8(a)]

Containers of used oil at WRI will be stored on the Tote Storage Area with two feet of aisle space along the east side of the containment area. Adequate aisle space will be maintained since the tote storage area has been outfitted with an industrial pallet rack system which is bolted in fixed position ensuring a minimum two feet of aisle space. The used oil drums will be inspected weekly and the corrective actions will be completed in a timely manner.

2.1 Aisle Space [8(a)(i)]

Containers are stored on the containment slab noted as the Sumped Work Area in Figure 1. The containers of used oil are emptied daily. The empty containers are cleaned, crushed and recycled as scrap metal. Containers are not normally brought to the WRI facility as they are most often pumped out using a vacuum truck. Vacuum trucks and tanker trucks will be most commonly used to transport used oil to WRI.

Containers of used oil at WRI will be stored on the sumped work area with two feet of aisle space at the east side of the containment area. Adequate aisle space will be maintained since the tote storage area has been outfitted with an industrial pallet rack system which is bolted in fixed position ensuring a minimum two feet of aisle space. The used oil drums will be inspected weekly and the corrective actions will be completed in a timely manner.

2.2 Secondary Containment [8(a)(ii)]

The Tote Storage Area has sufficient secondary containment for the used oil stored on the east side. A total of 30 used oil drums can be stored in rows along

the east side of the sumped work area. The containment volume calculations are provided by enclosure (2). The sumped work area is constructed from concrete coated with epoxy to prevent oil from penetrating the concrete pores.

2.3 Inspections and Corrective Actions [8(a)(iii)]

The used oil containers stored on the Sumped Work Area will be inspected weekly using the enclosure (3) checklist. Corrective action will be completed promptly to ensure the facility is maintained in a safe and environmentally friendly manner.

3.0 TANKS [8(b)]

The WRI used oil storage tank system meets the Performance Standards for Existing Shop Fabricated Storage Tank Systems as stated in Florida Administrative Code (FAC) 62-762.520. The WRI used oil closure plan meets the Aboveground Storage Tank Systems: Out of Service and Closure Requirements of FAC 62-762.800. The WRI inspection plan meets the Aboveground Storage Tank Systems: General Release Detection Standards of FAC 62-761.600. WRI has a procedure for the removal of released material and accumulated precipitation from secondary containment.

Enclosure (2) provides the secondary containment calculations for the WRI tank farm.

3.1 Performance Standards [8(b)(i)]

The WRI used oil storage tank system meets the Performance Standards for Existing Shop-Fabricated Storage Tank Systems in accordance with Florida Administrative Code (FAC) 62-762.520. The WRI used oil tank system is made of above ground steel tanks with a concrete secondary containment area surrounding the tank farm. The loading area has a concrete epoxy coated sumped area to ensure that used oil stays in a containment area. The pipe and hose connection area has a concrete containment to catch used oil while hoses are connected and disconnected. The used oil system piping is above ground and does not contact the soil.

3.2 Closure Plan [8(b)(ii)]

The WRI used oil closure plan is dated August 8, 2010 and is provided as attachment number 11 to the processor permit. The closure plan meets the requirements of the Aboveground Storage Tank Systems: Out of Service and Closure Requirements as stated in FAC 62-762.800.

3.3 Inspection and Monitoring Plan [8(b)(iii)]

The following spill prevention methods and procedures have been implemented by WRI.

3.3.1 Spill prevention responsibility

The Spill Prevention Coordinator at this facility is Mr. Steve Jenkins, (904) 475-9320. This person is responsible for petroleum spill prevention at the facility.

3.3.2 Spill prevention measures taken during transfer of petroleum

Used oil is transfer to the facility by registered commercial firms experienced in transportation and handling of petroleum products. Procedures used are required to meet Department of Transportation Standards. In general, these requirements include:

1. Qualified trucking personnel and WRI personnel must be present during the used oil transfer.
2. WRI personnel are responsible for identifying and explaining the operation of the system to used oil delivery personnel.
3. Vehicle engine must be stopped during the used oil transferring process, unless the vehicle engine is required for pumping the used oil. If the engine is required, verify that the vehicle wheels are chocked, the emergency brake is set and cones are in place around the delivery vehicle.
4. Vehicle hand brakes must be fully engaged during the used oil transferring process.
5. Level gauge on tank is to be continuously monitored during the fuel transferring process.
6. No smoking within 25 feet of the tank or vehicle area.
7. No fire or open flames within 25 feet of the tank or vehicle area.
8. Warning signs must be placed to prevent departure of the vehicle prior to completing used oil operations and removal of transfer lines.
9. Prior to filling and prior to vehicle departure, the drain and all outlets of the vehicle must be closely examined for leaks and tightened, repaired or replaced as necessary to prevent leaks.
10. All equipment must be grounded during transfer operations to prevent sparking.
11. Used oil delivered to this site must be made using a dispensing hose with an adapter to mate with the inlet piping Camlock. The person

delivering the used oil is responsible for insuring that the contents of the truck are delivered to the tank.

3.3.3 Inspections

The facility shall be inspected at least weekly, to assure timely discovery and correction of all potential failures or spills. The Tank System Visual Inspection Checklist is to be used to document the inspections. A copy is included as enclosure (4) of this plan. This documentation also serves as a checklist to assure that all equipment is utilized and all operations are performed in a safe and effective manner. Corrective action is to be taken upon discovery of any leaks or significant deterioration. The enclosure (5) Tank System Activity Log is to be completed for all system actions. All inspection records are to be maintained at the facility for the life of the tank system.

3.3.3.1 Inspection responsibility

The Spill Prevention Coordinator has the responsibility of ensuring that all documentation relating to the Spill Prevention Plan is maintained and kept current. The Coordinator may designate qualified personnel at the facility to perform the inspections.

3.3.3.2 Inspection of used oil storage tank

The exterior steel wall of the tanks shall be inspected weekly for signs of deterioration, including dents, pits, cracks, rust or other damage. Level gauges if installed shall be inspected monthly for signs of accuracy deterioration.

3.3.3.3 Inspection of piping

All interior and exterior piping, including joints, flanges, flexible connectors, valves, pipe supports as well as hoses and connections at the pumps and engine shall be inspected weekly for signs of deterioration or leaks that may cause a spill of the contents. Inspection shall include piping between the tank and the building and the piping within the containment area.

3.3.3.4 Inspection of secondary containment areas

All secondary containment areas are visually inspected on a weekly basis for signs of deterioration and accumulation of fluid or

other debris. These areas include the main containment area, the piping, containment sumps and the Sumped Work Area. Removal of petroleum or water from secondary containment areas is described in Sections 3.4.2 of this Plan

3.4 Released Material and Precipitation [8(b)(iv)]

Secondary containment areas for the tank system consist of the outer wall of the containment area, piping, containment sumps and the off loading area sump. These areas are inspected monthly in accordance with Section 3.3 of this Plan. Solid material, petroleum or water are not allowed to accumulate within the secondary containment areas. Any accumulation of fluid is removed immediately upon discovery. The following procedures have been implemented for the removal of fluid from containment areas.

3.4.1 Secondary containment

The storage tank area consists of steel primary tanks with a concrete secondary containment area. The concrete secondary containment area is coated with epoxy to make the concrete impermeable to used oil.

3.4.2 Removal of water from secondary containment

The following standard operating procedure has been implemented for removing water accumulated within secondary containment areas.

1. Accumulated water is inspected for the presence of a sheen or petroleum odor.
2. The accumulated water that has a visible sheen will be pumped into a collection tank marked industrial wastewater, stormwater SW1 or may be pumped out using a vacuum truck or tanker truck. The industrial wastewater will be sent to a facility with an industrial wastewater pretreatment permit. The industrial wastewater will be pretreated and discharged in accordance with the receiving facilities industrial wastewater pretreatment permit.
3. If a sheen or petroleum odor is not present, the water is not considered to be contaminated and may be disposed in a storm drain. The standard operating practice will be to manage all accumulated water as above, however an unusual significant rain event may necessitate the following alternate. The stormwater that does not contain a visible sheen may be

discharged to grade after an Oil and Grease scan has been completed and the result does not exceed 5 ppm in accordance with Florida Administrative Code (FAC) 62-302.530(49)(a). The discharge of rainwater to grade will be documented by using the WRI form, Secondary Containment Fluid Removal Record. The discharge of rainwater accumulated in the secondary containment to grade will be in accordance with all applicable local, state and federal rules and regulations.

4. Records consisting of the date, time, estimated quantity of accumulation, presence or absence of sheen or petroleum odor and person removing the accumulation are maintained for each discharge event. This information shall be noted on the Secondary Containment Fluid Removal record provided as enclosure (6) of this plan.

WATER RECOVERY, LLC
1819 ALBERT STREET
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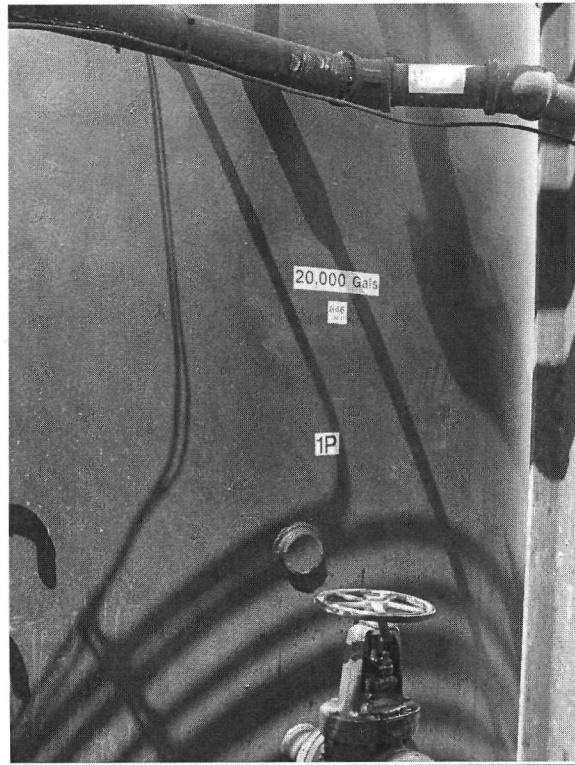
USED OIL PERMIT



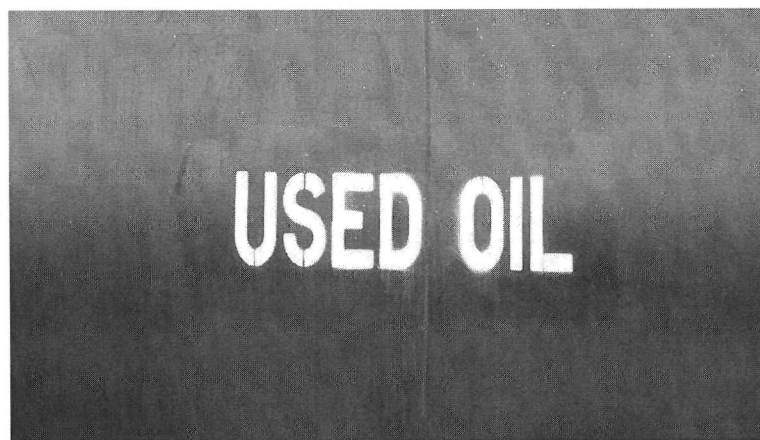
USED OIL TANKS – LINEUP VIEW

WATER RECOVERY, LLC
1819 ALBERT STREET
JACKSONVILLE, FL 32202

USED OIL PERMIT



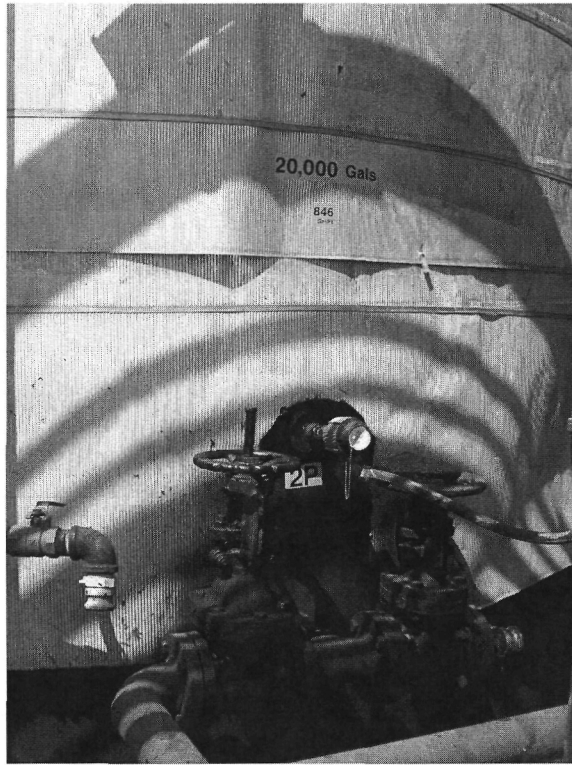
TANK 1P



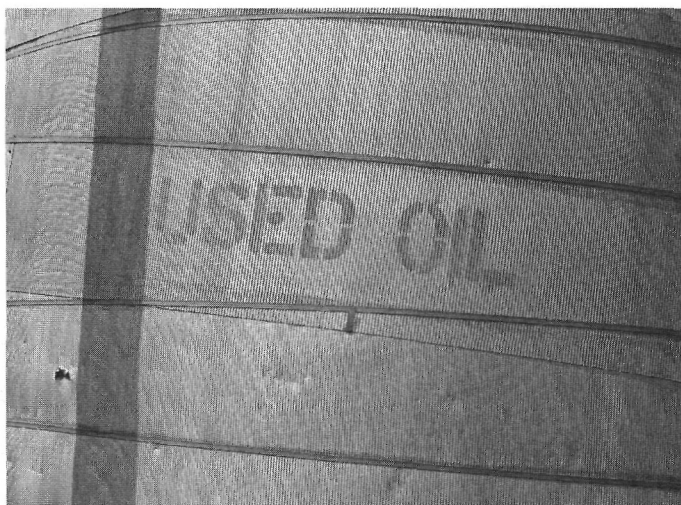
TANK 1P LABELED USED OIL

WATER RECOVERY, LLC
1819 ALBERT STREET
JACKSONVILLE, FL 32202

USED OIL PERMIT



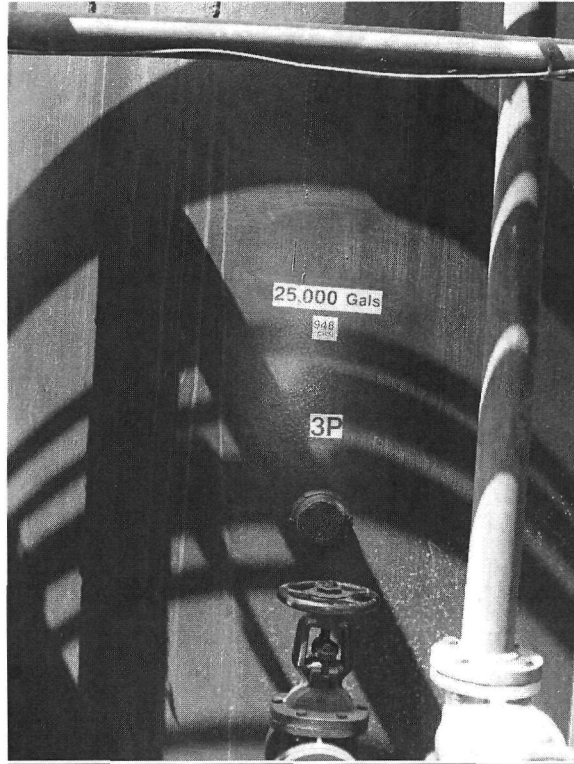
TANK 2P



TANK 2P LABELED USED OIL

WATER RECOVERY, LLC
1819 ALBERT STREET
JACKSONVILLE, FL 32202

USED OIL PERMIT



TANK 3P



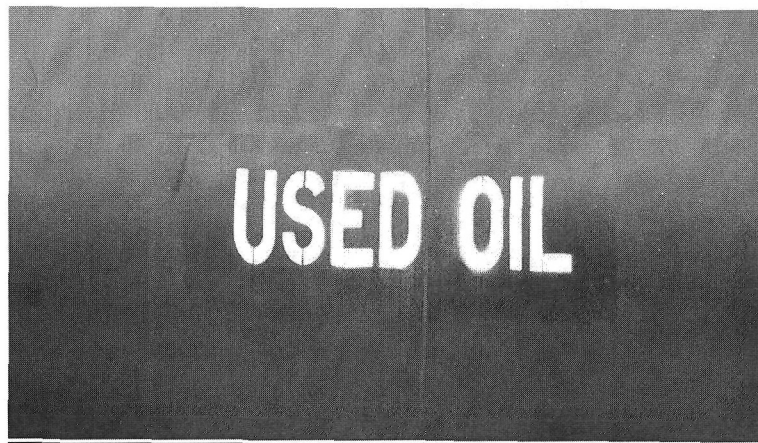
TANK 3P LABELED USED OIL

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1819 ALBERT STREET
JACKSONVILLE, FL 32202

USED OIL PERMIT



TANK 4P



TANK 4P LABELED USED OIL

WATER RECOVERY, LLC
1819 ALBERT STREET
JACKSONVILLE, FL 32202

USED OIL PERMIT

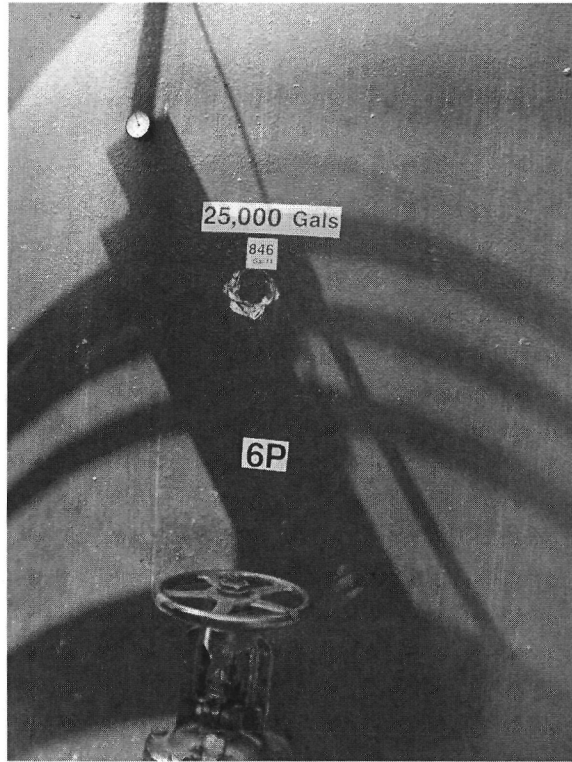


TANK 5P

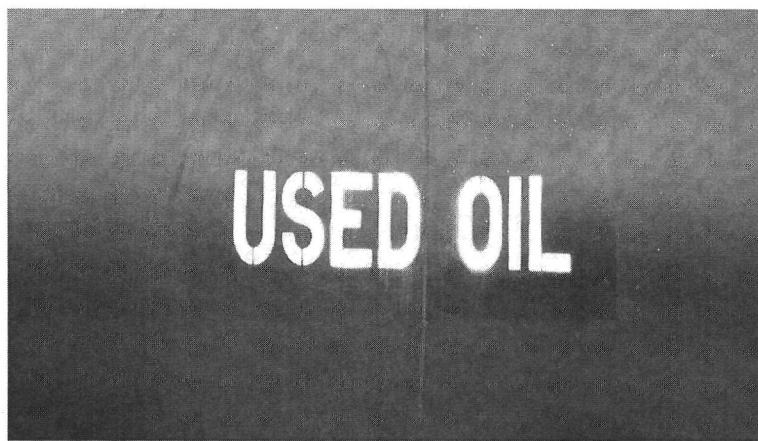


WATER RECOVERY, LLC
1819 ALBERT STREET
JACKSONVILLE, FL 32202

USED OIL PERMIT



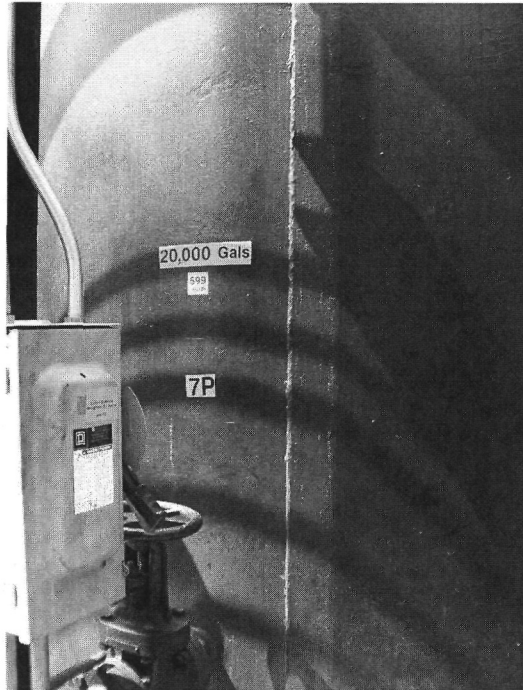
TANK 6P



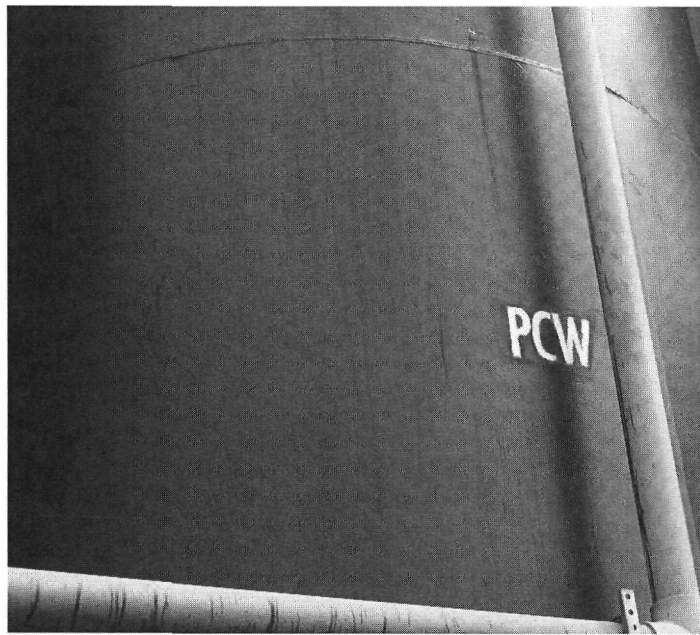
TANK 6P LABELED USED OIL

WATER RECOVERY, LLC
1819 ALBERT STREET
JACKSONVILLE, FL 32202

USED OIL PERMIT



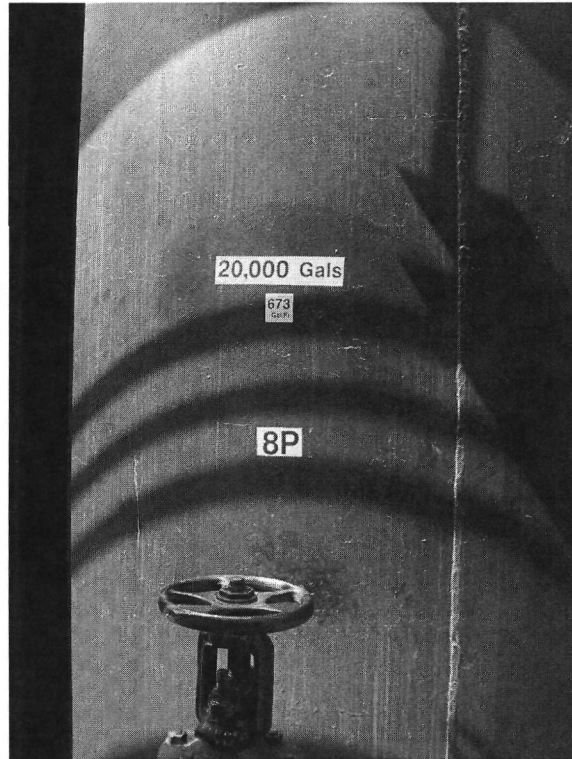
TANK 7P



TANK 7P LABELED PCW

WATER RECOVERY, LLC
1819 ALBERT STREET
JACKSONVILLE, FL 32202

USED OIL PERMIT



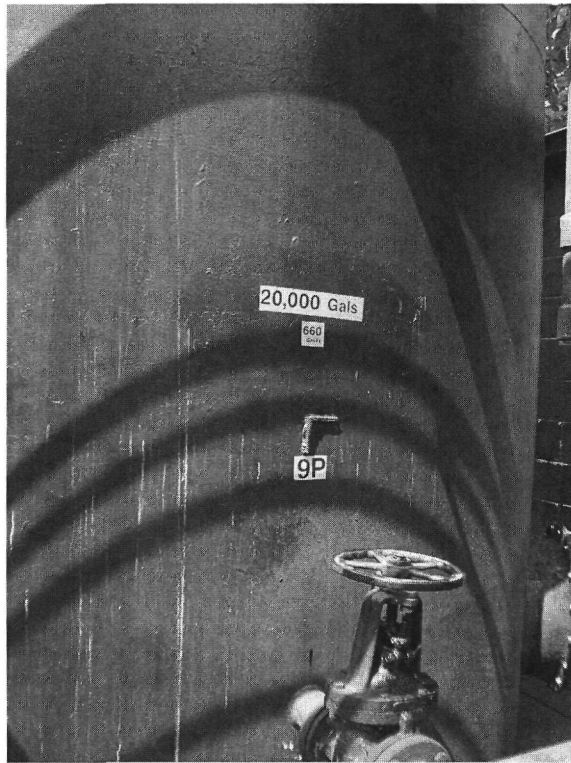
TANK 8P



TANK 8P LABELED USED OIL

WATER RECOVERY, LLC
1819 ALBERT STREET
JACKSONVILLE, FL 32202

USED OIL PERMIT



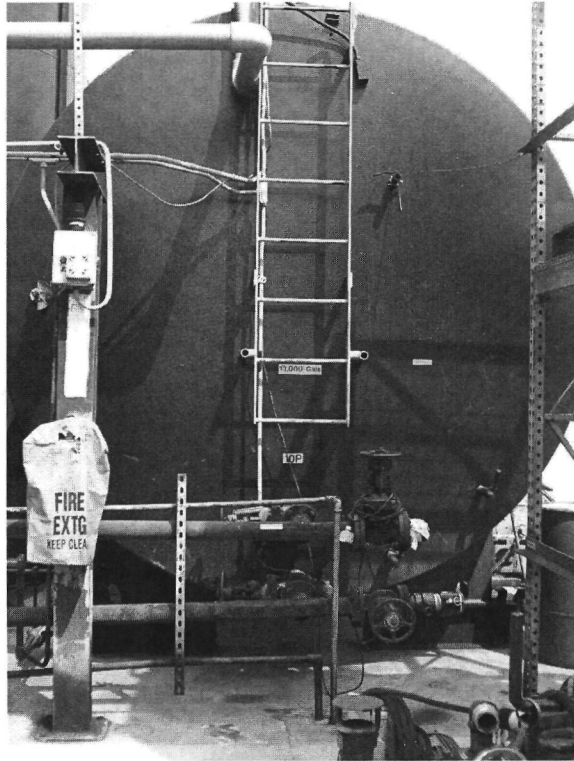
TANK 9P



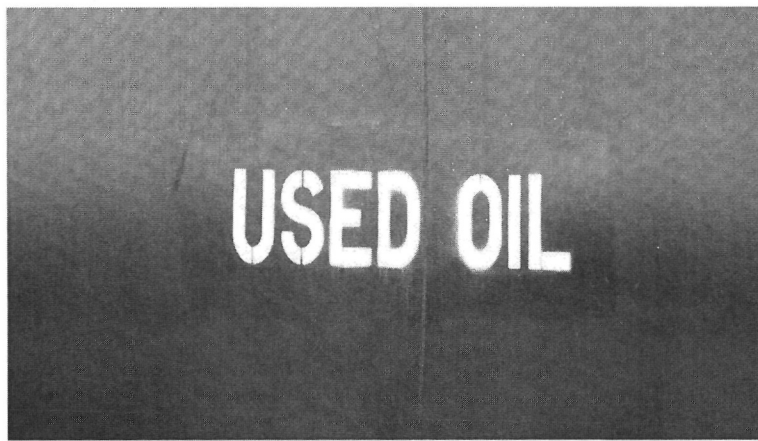
TANK 9P LABELED USED OIL

WATER RECOVERY, LLC
1819 ALBERT STREET
JACKSONVILLE, FL 32202

USED OIL PERMIT



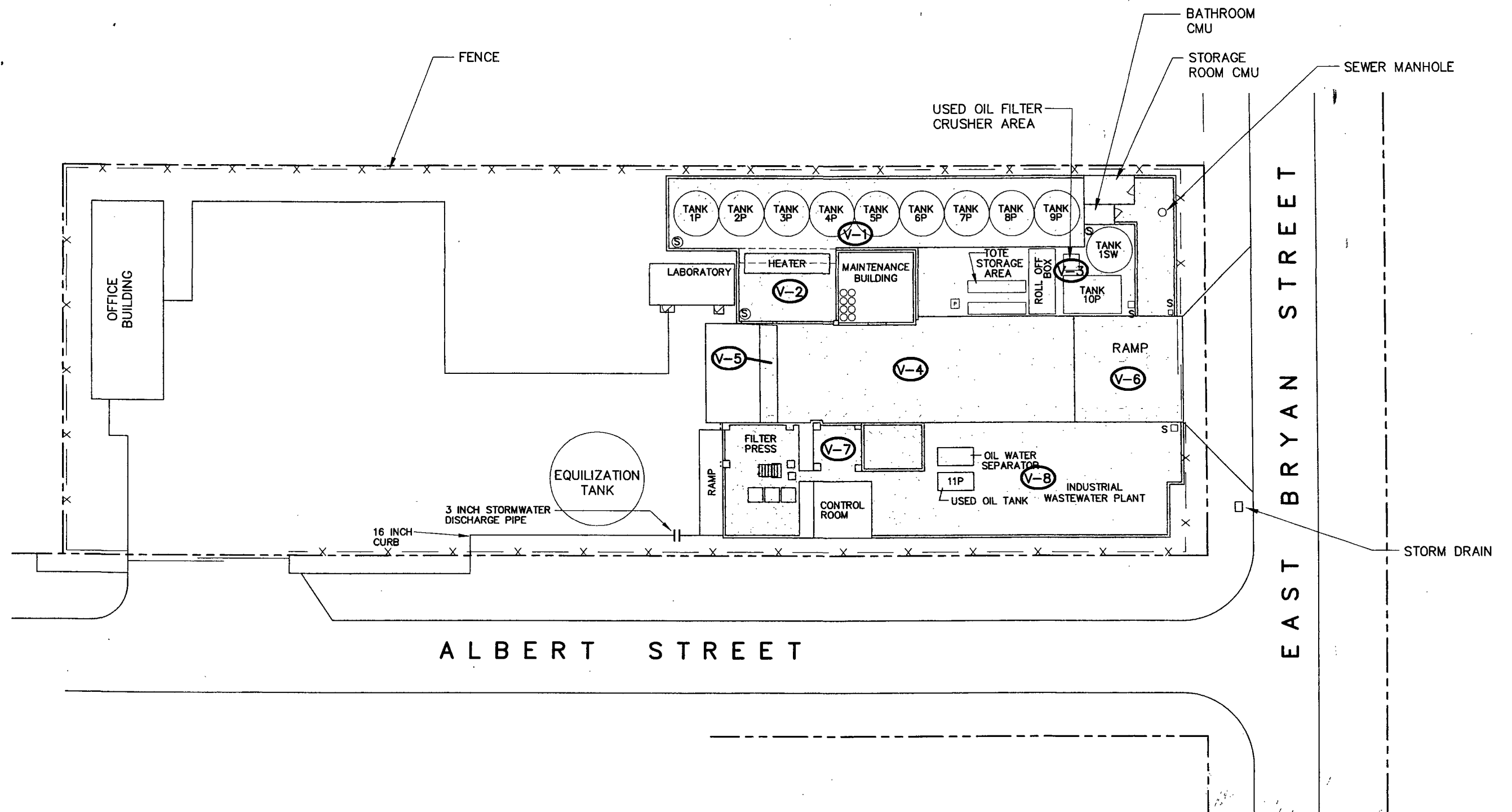
TANK 10P



TANK 10P LABELED USED OIL



SCALE: 1" = 30'



LEGEND

(V-1) VOLUME SECONDARY CONTAINMENT
AREA NUMBER 1

 AREA NOT USED IN SECONDARY CONTAINMENT
VOLUME CALCULATION

FIGURE 5 - SECONDARY CONTAINMENT CALCULATION AREA

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REVISED 12 JUNE 2001

$$V_5 = A_{s6} \Delta H_6 \cdot 0.5$$

$$V_5 = (27.5')(4.75')(9.97 - 9.67)(0.5)$$

$$V_5 = (130.6)(0.3)(0.5)$$

$$V_5 = \underline{19.6 \text{ FT}^3} \leftarrow$$

$$V_6 = A_{s7} \Delta H_7 \cdot 0.5$$

$$V_6 = (29.25')(30.0')(9.97 - 9.05)(0.5)$$

$$V_6 = 877.5(0.92)(0.5)$$

$$V_6 = \underline{403.7 \text{ FT}^3} \leftarrow$$

$$V_T = 306.3 + 233.7 + 849.9 + 1,787.5 + 19.6 + 403.7 \text{ FT}^3$$

$$V_T = 3,600.7 \text{ FT}^3 (7.48 \text{ gal / FT}^3)$$

$$V_T = 26,937 \text{ gal}$$

$$V_7 = A_{s8} \Delta H_8$$

$$V_7 = (14.0')(15.5')(9.97 - 9.58)$$

$$V_7 = (217)(0.39)$$

$$V_7 = \underline{84.6 \text{ FT}^3} \leftarrow$$

$$V_8 = A_{s9} \Delta H_9 \quad \text{NEW CONCRETE POURED JANUARY 2001.}$$

$$V_8 = [(64.23' \times 31.5') - (17.5')(3.33')](9.97 - 8.82)$$

$$V_8 = [2023.2 - 58.3 \text{ FT}^2](1.15)$$

$$V_8 = 1,964.9(1.15) = 2,259.6 \text{ FT}^3$$

$$V_8 = \underline{2,259.6 \text{ FT}^3} \leftarrow$$

T.W. Rudolph

6/12/01

REVISED 12 JUNE 2001

$$V_T = \sum V_{1-8}$$

$$V_T = 3,600.7 \text{ FT}^3 + V_7 + V_8$$

$$V_T = 3,600.7 + 84.6 + 2,259.6$$

$$V_T = 5,944.9 \text{ FT}^3 (7.481 \text{ gal/FT}^3)$$

$$V_T = 44,473 \text{ GALLONS}$$

THE LARGEST TANK VOLUME CAPACITY AT 110% IS:

$$V_{SW1} = 1.1(30,000 \text{ gal}) = 33,000 \text{ gallons}$$

THE SECONDARY CONTAINMENT VOLUME IS 44,473 GALLONS WHICH IS SUFFICIENT FOR MEETING THE REQUIREMENT TO HAVE 110% OF THE LARGEST TANKS CAPACITY.

ADD VOLUME OF DRUMS TO THE SW1 SECONDARY CONTAINMENT VOLUME.

$$V = V_{SW1} + V_D \cdot N_D$$

$$V = 33,000 \text{ GALLONS} + \frac{55 \text{ GALLON}}{\text{DRUM}} 48 \text{ DRUMS}$$

$$V = 33,000 + 2,640$$

$$V = 35,640 \text{ GALLONS}$$

∴ SECONDARY CONTAINMENT VOLUME IS OK

TW Kudolph

6/12/01

FIND VOLUME OF SECONDARY CONTAINMENT

$$V_T = V_1 + V_2 + V_3 + V_4 + V_5 + V_6 + V_7 + V_8$$

$$V_1 = [A_s - A_T] \Delta H$$

$$V_1 = [(115.4')(19.4') - \pi (12.5/2)^2 \cdot 9] (9.97 - 9.69)$$

$$V_1 = [2238.8 - 1104.5] 0.27$$

$$V_1 = (1134.3 \text{ FT}^2)(0.27 \text{ FT})$$

$$V_1 = \underline{306.3 \text{ FT}^3} \leftarrow$$

$$V_2 = A_s \Delta H = A_{s1} \Delta H_1 + A_{s2} \Delta H_2$$

$$V_2 = [(28.71')(16.125') - (\frac{4}{12})(\frac{3}{12})] (9.97 - 9.47) + [(28.71')(4')] (9.97 - 9.35)$$

$$V_2 = [462.9 - 0.2](0.5') + [114.8](0.02')$$

$$V_2 = 231.4 + 2.3 = 233.7$$

$$V_2 = \underline{233.7 \text{ FT}^3} \leftarrow$$

$$V_3 = A_{s3} \Delta H_3 + A_{s4} \Delta H_4 - \pi R_1^2 N - \pi R_2^2 N$$

$$V_3 = (45.8')(20.13')(9.97 - 9.14) + (25.33')(14.0')(9.97 - 8.96) \\ - \pi (12.5/2)^2 \cdot 1 - \pi (2/2)^2 \cdot 48$$

$$V_3 = (922.0)(0.83) + (354.6)(1.01) - 122.7 - 150.8$$

$$V_3 = 765.3 + 358.1 - 122.7 - 150.8 = 849.9$$

$$V_3 = \underline{849.9 \text{ FT}^3} \leftarrow$$

$$V_4 = A_{s5} \Delta H_5$$

$$V_4 = (112.0')(28.5')(9.97 - 9.41)$$

$$V_4 = 3192 (0.56')$$

$$V_4 = \underline{1,787.5 \text{ FT}^3} \leftarrow$$

J. W. Rudolph

ENCLOSURE (2)

12/2/99

$$V_5 = A_{s6} \Delta H_6 \cdot 0.5$$

$$V_5 = (27.5')(4.75')(9.97 - 9.67)(0.5)$$

$$V_5 = (130.6)(0.3)(0.5)$$

$$V_5 = \underline{19.6 \text{ FT}^3} \leftarrow$$

$$V_6 = A_{s7} \Delta H_7 \cdot 0.5$$

$$V_6 = (29.25')(30.0')(9.97 - 9.05)(0.5)$$

$$V_6 = 877.5(0.92)(0.5)$$

$$V_6 = \underline{403.7 \text{ FT}^3} \leftarrow$$

$$V_T = 306.3 + 233.7 + 849.9 + 1,787.5 + 19.6 + 403.7 \text{ FT}^3$$

$$V_T = 3,600.7 \text{ FT}^3 (7.481 \text{ gal / FT}^3)$$

$$V_T = 26,937 \text{ gal}$$

$$V_7 = A_{s8} \Delta H_8$$

$$V_7 = (14.0')(15.5')(9.97 - 9.58)$$

$$V_7 = (217)(0.39)$$

$$V_7 = \underline{84.6 \text{ FT}^3} \leftarrow$$

$$V_8 = A_{s9} \Delta H_9$$

$$V_8 = [(65')(32.17') - 15.33(4') - 6.93(61.5') - 3.15(61.5')](9.97 - 8.70)$$

$$V_8 = [2091.1 - 61.3 - 426.2 - 193.7](1.27')$$

$$V_8 = 1,409.9(1.27) = 1,790.6 \text{ FT}^3$$

$$V_8 = \underline{1,790.6 \text{ FT}^3} \leftarrow$$

Jim Rudolph

12/2/99

50 SHEETS
100 SHEETS
200 SHEETS

22-141
22-142
22-144





$$V_T = \sum V_{1-8}$$

$$V_T = 3,600.7 \text{ FT}^3 + V_7 + V_8$$

$$V_T = 3,600.7 + 84.6 + 1,709.6$$

$$V_T = 5,394.9 \text{ FT}^3 (7.481 \text{ gal/FT}^3)$$

$$V_T = 40,359 \text{ GALLONS}$$

THE LARGEST TANK VOLUME CAPACITY AT 110% IS:

$$V_{SW1} = 1.1(30,000 \text{ gal}) = 33,000 \text{ gallons}$$

THE SECONDARY CONTAINMENT VOLUME IS 40,359 GALLONS WHICH IS SUFFICIENT FOR MEETING THE REQUIREMENT TO HAVE 110% OF THE LARGEST TANKS CAPACITY.

ADD VOLUME OF DRUMS TO THE SW1 SECONDARY CONTAINMENT VOLUME.

$$V = V_{SW1} + V_D \cdot N_D$$

$$V = 33,000 \text{ GALLONS} + \frac{55 \text{ GALLON}}{\text{DRUM}} 48 \text{ DRUMS}$$

$$V = 33,000 + 2,640$$

$$V = 35,640 \text{ GALLONS}$$

∴ SECONDARY CONTAINMENT VOLUME IS OK

JW Rudolph

12/2/99

USED OIL WEEKLY INSPECTION RECORD

Authorized Inspectors:

Site Location:

Inspection Date:

Inspection Time:

Inspector's Initials:

Site Status:

INSPECTION ELEMENTS:

1. Check all drums for leaks, corrosion, bulging, etc.
2. Ensure all drums are closed and stored in secondary containment.
3. Make sure there is isle space between rows of drums.
4. Ensure ground straps available and unsealed containers of ignitables are grounded.
5. Ensure all drums are marked with the words "Used Oil"
6. Check containment condition; clean, dry drain secure.
7. Ensure facility secured against unauthorized entry.
8. Make sure personal Protective equipment is available.
9. Check condition of loading/unloading area
10. Check site perimeter: vegetation trimmed and no signs of leakage (dead vegetation or discolored soil).
11. Check for spill control supplies
12. Make sure fire extinguishers are full and sealed.
13. Check operation of emergency equipment (phone, alarm, water supply)
14. Make sure drums of used oil are in designated areas.
15. Make sure Contingency Plan emergency phone numbers are posted.

REMARKS (Date corrective action taken, sump drainage, and other observations):

NOTE: Inspections must be conducted at least every 7 days. Facility must maintain a record of each inspection for 3 years

Weekly Tank System Visual Inspection Checklist

YEAR:

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

COMMENTS:

ENCLOSURE (4)

TANK SYSTEM VISUAL INSPECTION CHECKLIST
<WRI TANK SYSTEM VISUAL INSPECTION CHECKLIST-2-1.XLS>

PAGE 1 OF 2

* An explanation is needed for any item that is answered with a "No" ENCLOSURE (4)

Weekly Tank System Visual Inspection Checklist

YEAR: _____

GENERAL DESCRIPTION UST OR AST CAPACITY (GALLONS) TANK CONTENTS CHECKLIST ITEMS	DATE	DATE	DATE	DATE	DATE	DATE	DATE	DATE	DATE	DATE	DATE	DATE
<u>GENERAL</u>	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?												
16. No suspicious or unusual petroleum odors are present in the tank system area?												
17. No signs of distressed vegetation that could be the result of a petroleum release?												
18. Are manway/manhole covers in place correctly?												
19. If present are monitoring well and/or soil vapor well locked or other wise secured?												
20. SPCC Plan on site and in proper location?												
21. Alarms (float sensor, optical sensors) in correct position?												
22. Alarm wiring in good condition (not loose or frayed)?												
23. Security fence intact?												
24. Security lighting working properly?												
INSPECTOR'S INITIALS												

COMMENTS:

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

ENCLOSURE (4)

* An explanation is needed for any item that is answered with a "No" ENCLOSURE (4)

ENCLOSURE (5)

DATE & INIT	Type of Activity		EXPLANATION
	Alarm Verification	Alarm Incidents & Results	
	Tank Malfunctions	Tank Repairs	
	Piping Malfunctions	Piping Repairs	
	Routine Maintenance	Tank System Modification	
	Monitor Repair	Tank Tightness Testing by Vendor	
	Tank System Alarm Panel	Other	
	Leak/Spill		
	Alarm Verification	Alarm Incidents & Results	
	Tank Malfunctions	Tank Repairs	
	Piping Malfunctions	Piping Repairs	
	Routine Maintenance	Tank System Modification	
	Monitor Repair	Tank Tightness Testing by Vendor	
	Tank System Alarm Panel	Other	
	Leak/Spill		
	Alarm Verification	Alarm Incidents & Results	
	Tank Malfunctions	Tank Repairs	
	Piping Malfunctions	Piping Repairs	
	Routine Maintenance	Tank System Modification	
	Monitor Repair	Tank Tightness Testing by Vendor	
	Tank System Alarm Panel	Other	
	Leak/Spill		

Record and activity regarding the fuel tank and/or piping that cannot be recorded or explained on the Monthly Tank System Visual Inspection Checklist.

1. Write the date and your initials in Column 1.
2. Mark the appropriate box in Column 2.
3. Explain in detail whatever occurred, whatever you did and whatever you found during inspections.

TANK SYSTEM ACTIVITY LOG
 <WRIACTIVITYLOG-2>
 ENCLOSURE (5)

SECONDARY CONTAINMENT FLUID REMOVAL RECORD

Water Recovery
1819 Albert Street
Jacksonville, Florida 32202

LOCATION: _____

DATE: _____

TIME: _____

OPERATOR: _____

ACCUMULATED FLUID (Circle): Diesel / Water / Used Oil / Other (Specify): _____

APPROXIMATE VOLUME OF FLUID: _____

SOURCE OF ACCUMULATED FLUID: _____

APPEARANCE OF FLUID PRIOR TO REMOVAL (Color, Sheen, Etc.): _____

ACTION TAKEN PRIOR TO REMOVAL OF PETROLEUM: _____

DESCRIBE ANY WASTES GENERATED (Volume, Disposal, Etc.):

**REMOVAL OF INDUSTRIAL WASTEWATER MUST BE IN ACCORDANCE
WITH SECTION 3.4 OF MANAGEMENT PROCEDURE 4700.**

DESCRIBE ANY WASTES GENERATED (Volume, Disposal, Etc.): _____

COMMENTS: _____

Oil and Grease Scan does not exceed 5 ppm Yes / No - **CIRCLE ONE AND
ENCLOSE ANALYTICAL RESULTS, IF NO IS CIRCLED HAVE INDUSTRIAL
WASTEWATER SENT TO A PERMITTED PRETREATMENT FACILITY FOR
PROCESSING.**

<4200-ENCLOSURE-2>

ENCLOSURE (6)

OVERSIZE
DOCUMENT WAS
REMOVED AND
INSERTED INTO
OCULUS
SEPARATELY.

SEE: OVERSIZED
DRAWING #2