

Permit Document Routing Sheet

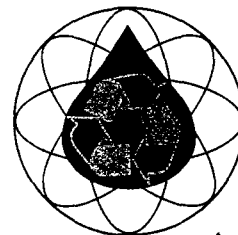
Index Date	Document Type	EPAID	Document Date
9/25/2003	CORRESPONDENCE	FLR000060301	2003.06.11
PERMIT_NUMBER	PROJECT_MANAGER	Name	
	PARKER	ATLANTIC INDUSTRIAL SERVICES	
Subject: LETTER STATING THAT FAC DECIDED TO BEGIN CLOSURE PROCESS.			

RCRA Permitting Routing Slip			
TO	NAME	INITIALS	DATE
	KASTURY, Satish		
	Ashwood, Janet		
	McGriff, Juliette		
	Outley, Debra		
	Thursby, Kim		
	Putcha, Subra		
	RUSSELL, Merlin		
	Cook, Bob		
	Doyle, James		
	Graves, Shelton		
	Holst, Jim		
	Kaharoeddin, Ami		
	Kocher, Frederick		
	Madrid, Nicanor		
	Stein, Camille		
<input checked="" type="checkbox"/>	OUTLAW, Doug	J20	
	Echevarria, Edgar		
	Gaynor, Kathy		
	Griffin, John		
<input checked="" type="checkbox"/>	Kothur, Bheem	Beu	10/6/03
<input checked="" type="checkbox"/>	Parker, Bill		245 & 2
	Prusty, Rabin		
	Harold Register		

Document Index Number (docdruid) : 1.83091.1

Thursday, September 25, 2003

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



Atlantic
Industrial Services, Inc.

June 11, 2003

Mr. Rick Neves
Florida Department of Environmental Protection
Hazardous Waste Section
Twin Towers Office Building
2600 Blair Stone Road
Tallahassee, FL 32399-2400

RECEIVED
RCRA
SEP 25 2003
Hazardous Waste Regulation

Reference: Atlantic Industrial Services, Inc. Lowell Used Oil Processing Permit
HOMM-0127776-003 Facility Closure.

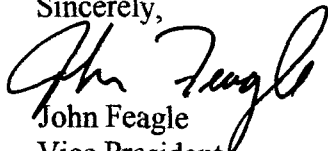
Dear Mr. Neves,

Atlantic Industrial Services, Inc. has decided to begin the closure process for the referenced facility. No new used oil will be received at the facility from this point forward in time. Please consider this notification the official FDEP 60-day notification prior to the start of closure activities for the Atlantic Industrial Services, Inc. Lowell facility.

Please expedite the renewal of recently submitted used oil processing renewal application.

Please do not hesitate to call me at (800) 328-8252 if you should have any additional questions or should you need additional information. Your prompt action concerning this matter is greatly appreciated.

Sincerely,


John Feagle
Vice President
<AIS-FDEP-21>

cc: Bill Parker, FDEP Tallahassee
Vivian F. Garfein, FDEP Orlando
Angie Sweeney, Marion County Fire Department
Tim Rudolph, ENVIRONEERING, Inc.
Mike Wilkinson, Mid-Florida Mining, Inc.
Alec Thomas, CEO Atlantic Industrial Services, Inc.
Mike Levitsky, Atlantic Industrial Services, Inc.

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July 30, 2003

Mr. Rick Neves
Florida Department of Environmental Protection
Hazardous Waste Section
Twin Towers Office Building
2600 Blair Stone Road
Tallahassee, FL 32399-2400

RECEIVED
RCRA
SEP 25 2003
Hazardous Waste Regulation

Subject: Formal Request for Extension.

Reference: FDEP Ltr Dtd June 30, 2003 - Atlantic Industrial Services,
Inc./FLD991275355 Used Oil Processing Permit Renewal Application for a
Facility in Marion County (Reddick) – Renewal of Permit Number HOMM-
0127776-003.

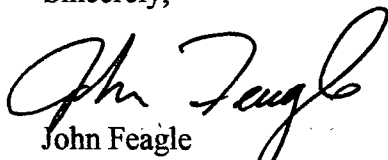
Dear Mr. Neves,

The information requested in your referenced letter will be provided on September 19, 2003. A request for a formal extension is made due to summer vacation schedules.

Schedule: Submittal on September 19, 2003.

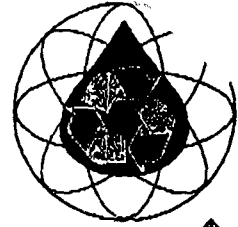
Please do not hesitate to call me at (800) 328-8252 if you should have any additional questions or should you need additional information. Your prompt action concerning this matter is greatly appreciated.

Sincerely,


John Feagle
Vice President Operations
<AIS-FDEP-22 >

cc: Bill Parker, FDEP Tallahassee
Tim Rudolph, ENVIRONEERING, Inc.
Alec Thomas, CEO Atlantic Industrial Services, Inc.
Mike Levinsky, Atlantic Industrial Services, Inc.

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



Atlantic
Industrial Services, Inc.

RECEIVED
RCRA

SEP 25 2003

Hazardous Waste Regulation

September 8, 2003

Mr. Rick Neves
Florida Department of Environmental Protection
Hazardous Waste Section
Twin Towers Office Building
2600 Blair Stone Road
Tallahassee, FL 32399-2400

Subject: USED OIL PROCESSING PERMIT INFORMATION SUBMITTAL.

Reference: FDEP Ltr Dtd June 30, 2003 - Atlantic Industrial Services,
Inc./FLD991275355 Used Oil Processing Permit Renewal Application for a
Facility in Marion County (Reddick) - Renewal of Permit Number HOMM-
0127776-003.

Dear Mr. Neves,

The following response is provided for the items requested in the referenced letter. Three copies of the requested information are provided as requested.

Tab 1 A. General Site Information

p.15 "Part II Certification"

Three copies of the original application are provided that have the original seal of the PE registration.

Tab 3 - Waste Analysis Plan

p.2 "INCOMING WASTE"

Requested change made.

p.2 "USED OIL"

The phrase "(only if required in new regulations)" contained a typographical error and has been corrected to read "(only if water is present)".

p.3 Requested change made.

p.4 Requested change made.

Atlantic Industrial Services, Inc.
Page 2 of 2
September 8, 2003

p.4 "GENERATED WASTES"
Requested changes made.

p.5 "ANALYSIS"
Requested changes made.

Tab 5 – Used Oil Tracking Plan

The requested change has been made and the newly revised forms are enclosed.

Tab 6 – Spill Prevention & Countermeasure Plan

p.2 The requested change has been made and is enclosed.

Tab 10 – Used Oil Training Program

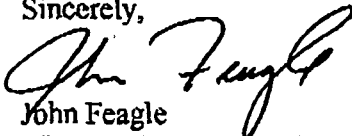
p.7 C. "EMPLOYEE TRAINING PROGRAM VERIFICATION"

The statement "AIS training test methodology will be either an oral quiz or written test." was intended to mean that either method could be used at the discretion of the instructor. The instructor may give the training class a written exam, an oral exam or the instructor may give part of the class a written exam and part of the class an oral exam. The oral exam is normally given to personnel who are very familiar with the regulations or those who do not know how to read. The section has been revised and is enclosed.

p.9 The attached sheets are the UAUOS Certification Manual and were not submitted in accordance with the last paragraph on the page which states "*This document shall be submitted to the FDEP to facilitate review of the training program. If the UAUOS Certification Manual is to be used as the training manual, a copy of said manual need not be submitted with this document.*"

Please do not hesitate to call me at (800) 328-8252 if you should have any additional questions or should you need additional information. Your prompt action concerning this matter is greatly appreciated.

Sincerely,


John Feagle
Vice President Operations
<AIS-FDEP-22 >

cc: Bill Parker, FDEP Tallahassee
Tim Rudolph, ENVIRONEERING, Inc.
Alec Thomas, CEO Atlantic Industrial Services, Inc.
Mike Levinsky, Atlantic Industrial Services, Inc.



Atlantic
Industrial Services, Inc.
Fuel Services, Inc.

“Recycling Waste To Energy”

DEP Form#	62-710.901(d)
Form Title	Used Oil Processing Facility Permit Application
Effective Date	December 23, 1996

APPLICATION FROM 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.]

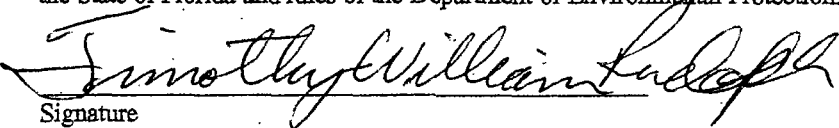
Use this form to certify to the Department of Environmental Protection for:

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.

Engineering certification is valid for one year unless tanks
are painted or closure is begun within one years time.

- Initial Certification XX Recertification
1. DEP Facility ID Number: FLD991275355 2. Tank Numbers: 1-6 N, 1-6 S, C1, C2, J, 8 & 9.
3. Facility Name: Atlantic Industrial Services, Inc.
4. Facility Address: 3951 West Highway 329, Reddick, Florida

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


Signature
Timothy William Rudolph
Name (please type)

Florida Registration Number: 39617

Mailing Address: 109 Azalea Point Drive South
Street or P. O. Box
Ponte Vedra Beach, FL 32082

City State Zip
Date: 5/27/2003 Telephone (904) 655-0100

[PLEASE AFFIX SEAL]

ATTACHMENT (C5a)

USED OIL WASTE ANALYSIS PLAN

Used Oil Waste Analysis Plan

INCOMING WASTE

All sampling and analyses will be performed in accordance with FDEP approved Quality Assurance procedures in Florida Administrative Code (F.A.C.) Chapter 62-160. Laboratories that complete the analysis work must be certified by the Florida Department of Health (DOH) Environmental Laboratory Certification Program (ELCP). Field samples must be obtained in accordance with F.A.C. Chapter 62-160.210 using the applicable collection and quality control protocols and requirements described in DEP-SOP-001/01 (January 1, 2002). Analyses will be performed on every new waste stream submitted for acceptance by AIS. Parameters will vary according to the Generator Waste Profile (GWP) sheet submitted by the generator and via process knowledge. However, at a minimum, each waste stream will be tested for hazardous characteristics in accordance with 40 CFR Part 260-2 Subpart C as follows:

WASTEWATER

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

USED OIL

<u>Parameter</u>	<u>Method No.</u>	<u>Allowable Limit</u>
Flash Point	1010	$\geq 140^{\circ}\text{F}$ (60°C)
pH	150.1	>2 or <12.5 (only if water is present)
Color	110.2	ID

USED OIL (CONTINUED)

<u>Parameter</u>	<u>Method No.</u>	<u>Allowable Limit</u>
Odor	2150	ID
Halogens	9077	<1000 mg/L (9077A) or <4000
	9020	mg/L (9077C) if Rebuttable
	9075	presumption is satisfied
Physical Appearance	N/A	ID
PCBs	8080	< 2 mg/l

Analyses will be performed by a laboratory certified by the Florida Department of Health (DOH) Environmental Laboratory Certification Program (ELCP).

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

FREE PRODUCT SHIPPED

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

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

Only processed oil, which is under the allowable levels described in 40 CFR Part 279.11 will be shipped for energy recovery or industrial use. Applicable standards for the burning of used oil containing PCBs are imposed by 40 CFR 761.20(e). All documentation associated with the analysis plan will fall under FDEP SOP requirements for record retention and therefore be addressed in accordance with F.A.C. 62-160.

GENERATED WASTES

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

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

The solid waste streams generated onsite will be sampled and analyzed one time per year to make a waste determination in accordance with 40 CFR 262.11. All outgoing hazardous wastes will be transported by a licensed hazardous waste transporter. Designated disposal facilities will be RCRA approved. The facility has not generated hazardous waste to date.

All analyses will be requested via AIS's Chain of Custody (COC) Document. Each sample submitted for analyses will be recorded on AIS's Sample Receiving Log. All

analytical results will be recorded in AIS's computer database and hard copies will be provided for generator files.

Waste streams for which the analytical results indicate any constituent or property exceeds acceptable limits, shall be considered hazardous waste and shall not be accepted into the AIS facility in accordance with 40 CFR Parts 260-265. Additional testing may be required for waste streams that through generator knowledge may possibly contain constituents from a listed hazardous waste as defined in 40 CFR 261.30 Subpart D.

SAMPLING

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

ANALYSIS

Outgoing shipments are divided into two categories:

- Shipments requiring thermal treatment.
- Shipments requiring landfill.

Samples will be taken to a laboratory certified by the Florida Department of Health (DOH) Environmental Laboratory Certification Program (ELCP) and may be analyzed for the following constituents:

- **Thermal treatment:**

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

- **Landfill:**

TCLP Metals and TCLP Volatile Organics will normally be run on a representative waste stream sample one time per year. Additional or fewer analytical parameters may be completed depending upon the facility's permit.

AIS INCOMING USED OIL SHIPMENT LOG

[illegible]

PREPARED BY:
ENVIRONEERING, INC
(904) 665-0100

RETAIN THIS DOCUMENT FOR AT LEAST 3 YEARS.

ENCLOSURE (1)

<AIS-4400-1.XLS>

AIS OUT-GOING USED OIL SHIPMENT LOG

[illegible]

PREPARED BY:
ENVIRONEERING, INC
(904) 665-0100

RETAIN THIS DOCUMENT FOR AT LEAST 3 YEARS

<WRI-4400-2.XLS>

ENCLOSURE (2)

1.1 CERTIFICATION OF SPCC PLAN [112.3(d)]

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

1.2 AVAILABILITY OF SPCC PLAN [112.3(e)]

A complete copy of this SPCC Plan is maintained in the main building of the facility in the environmental department at 329 Cypress Road, Silver Spring Shores, Ocala, Florida. The environmental department is located in the main office building. The location of the SPCC Plan is at the nearest facility place of business. 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.

Copies of the plan are also located at the office of the Vice President and the Spill Response Coordinator. All revisions to the plan must be made to all copies of the plan.

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.

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

AIS 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 all revisions or amendments to the Plan will be noted in Appendix E of this Plan. All revisions except those made to the emergency contact list will be reviewed and certified by a State of Florida Registered Professional Engineer.

C. Employee Training Program Verification

1. Description of employee training test methodology (i.e. oral quiz, written test, etc.).

The Atlantic Industrial Services, Inc. training test methodology will be by either an oral quiz or written test.

The type of test given will be determined by the training instructor on an individual basis.

D. Employee Training Frequency

1. Description of the frequency of employee training (annually, every two years, etc.)

Atlantic Industrial Services, Inc. employees will be trained annually after the initial training. Atlantic Industrial Services, Inc. employees who handle, manifest, sample, process or treat used oil will be trained.

Page 2 of 4

The serial number of this manual is UOTCM 3/96

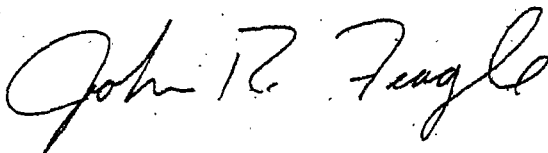
(NOTE: Please submit this page to FDEP with your renewal registration forms)

Used Oil Training Program Signature Page

~~TRANSPORTER & PROCESSOR~~
I certify as a used oil ~~transporter~~ that the training program required under Rule 62-710.600, Florida Administrative Code, as described on the attached sheets will be implemented and adhered to. To the best of my knowledge, the training program described is in full compliance with the rule 62-710.600. (no pages are attached since the UAUOS Training manual is used)

JOHN R. FEAGLE VICE PRESIDENT

Name of Authorized Person (Print or Type)



Signature of Authorized Person

4/6/2000

Date

This document shall be submitted to the FDEP to facilitate review of the training program. If the UAUOS Certification Manual is to be used as the training manual, a copy of said manual need not be submitted with this document.

Page 4 of 4

The serial number of this manual is UOTCM 3/96

(NOTE: Please submit this page to FDEP with your renewal registration forms)

DEP Form#	62-710.901(d)
Form Title	Used Oil Processing Facility Permit Application
Effective Date	December 23, 1996

APPLICATION FROM 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.

Engineering certification is valid for one year unless tanks
are painted or closure is begun within one years time.

	Initial Certification	XX	Recertification
1. DEP Facility ID Number:	FLD991275355		1-6 N, 1-6 S, C1, C2,
2. Tank Numbers:			J, 8 & 9.
3. Facility Name:	Atlantic Industrial Services, Inc.		
4. Facility Address:	3951 West Highway 329, Reddick, Florida		

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



Signature

Timothy William Rudolph

Name (please type)

Florida Registration Number: 39617

Mailing Address: 109 Azalea Point Drive South
Street or P. O. Box
Ponte Vedra Beach, FL 32082

City State Zip
Date: 5/27/2003 Telephone (904) 665-0100

[PLEASE AFFIX SEAL]

ATTACHMENT (C5a)

USED OIL WASTE ANALYSIS PLAN

Used Oil Waste Analysis Plan

INCOMING WASTE

All sampling and analyses will be performed in accordance with FDEP approved Quality Assurance procedures in Florida Administrative Code (F.A.C.) Chapter 62-160. Laboratories that complete the analysis work must be certified by the Florida Department of Health (DOH) Environmental Laboratory Certification Program (ELCP). Field samples must be obtained in accordance with F.A.C. Chapter 62-160.210 using the applicable collection and quality control protocols and requirements described in DEP-SOP-001/01 (January 1, 2002). Analyses will be performed on every new waste stream submitted for acceptance by AIS. Parameters will vary according to the Generator Waste Profile (GWP) sheet submitted by the generator and via process knowledge. However, at a minimum, each waste stream will be tested for hazardous characteristics in accordance with 40 CFR Part 260-2 Subpart C as follows:

WASTEWATER

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

USED OIL

<u>Parameter</u>	<u>Method No.</u>	<u>Allowable Limit</u>
Flash Point	1010	$\geq 140^{\circ}\text{F}$ (60°C)
pH	150.1	>2 or <12.5 (only if water is present)
Color	110.2	ID

USED OIL (CONTINUED)

<u>Parameter</u>	<u>Method No.</u>	<u>Allowable Limit</u>
Odor	2150	ID
Halogens	9077	<1000 mg/L (9077A) or <4000 mg/L (9077C) if Rebuttable presumption is satisfied
	9020	
	9075	
Physical Appearance	N/A	ID
PCBs	8080	< 2 mg/l

Analyses will be performed by a laboratory certified by the Florida Department of Health (DOH) Environmental Laboratory Certification Program (ELCP).

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

FREE PRODUCT SHIPPED

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

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

Only processed oil, which is under the allowable levels described in 40 CFR Part 279.11 will be shipped for energy recovery or industrial use. Applicable standards for the burning of used oil containing PCBs are imposed by 40 CFR 761.20(e). All documentation associated with the analysis plan will fall under FDEP SOP requirements for record retention and therefore be addressed in accordance with F.A.C. 62-160.

GENERATED WASTES

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

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

The solid waste streams generated onsite will be sampled and analyzed one time per year to make a waste determination in accordance with 40 CFR 262.11. All outgoing hazardous wastes will be transported by a licensed hazardous waste transporter. Designated disposal facilities will be RCRA approved. The facility has not generated hazardous waste to date.

All analyses will be requested via AIS's Chain of Custody (COC) Document. Each sample submitted for analyses will be recorded on AIS's Sample Receiving Log. All

analytical results will be recorded in AIS's computer database and hard copies will be provided for generator files.

Waste streams for which the analytical results indicate any constituent or property exceeds acceptable limits, shall be considered hazardous waste and shall not be accepted into the AIS facility in accordance with 40 CFR Parts 260-265. Additional testing may be required for waste streams that through generator knowledge may possibly contain constituents from a listed hazardous waste as defined in 40 CFR 261.30 Subpart D.

SAMPLING

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

ANALYSIS

Outgoing shipments are divided into two categories:

- Shipments requiring thermal treatment.
- Shipments requiring landfill.

Samples will be taken to a laboratory certified by the Florida Department of Health (DOH) Environmental Laboratory Certification Program (ELCP) and may be analyzed for the following constituents:

- **Thermal treatment:**

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

- **Landfill:**

TCLP Metals and TCLP Volatile Organics will normally be run on a representative waste stream sample one time per year. Additional or fewer analytical parameters may be completed depending upon the facility's permit.

AIS OUT-GOING USED OIL SHIPMENT LOG

[illegible]

PREPARED BY:
ENVIRONEERING, INC
(904) 665-0100

RETAIN THIS DOCUMENT FOR AT LEAST 3 YEARS

ENCLOSURE (2)

<WRI-4400-2.XLS>

AIS INCOMING USED OIL SHIPMENT LOG

[illegible]

1.1 CERTIFICATION OF SPCC PLAN [112.3(d)]

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

1.2 AVAILABILITY OF SPCC PLAN [112.3(e)]

A complete copy of this SPCC Plan is maintained in the main building of the facility in the environmental department at 329 Cypress Road, Silver Spring Shores, Ocala, Florida. The environmental department is located in the main office building. The location of the SPCC Plan is at the nearest facility place of business. 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.

Copies of the plan are also located at the office of the Vice President and the Spill Response Coordinator. All revisions to the plan must be made to all copies of the plan.

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.

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

AIS 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 all revisions or amendments to the Plan will be noted in Appendix E of this Plan. All revisions except those made to the emergency contact list will be reviewed and certified by a State of Florida Registered Professional Engineer.

C. Employee Training Program Verification

1. Description of employee training test methodology (i.e. oral quiz, written test, etc.).

The Atlantic Industrial Services, Inc. training test methodology will be by either an oral quiz or written test.

The type of test given will be determined by the training instructor on an individual basis.

D. Employee Training Frequency

1. Description of the frequency of employee training (annually, every two years, etc.)

Atlantic Industrial Services, Inc. employees will be trained annually after the initial training. Atlantic Industrial Services, Inc. employees who handle, manifest, sample, process or treat used oil will be trained.

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The serial number of this manual is UOTCM 3/96

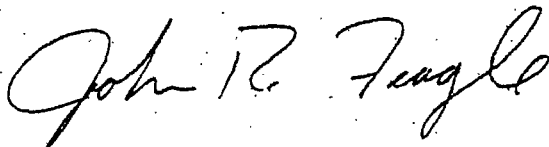
(NOTE: Please submit this page to FDEP with your renewal registration forms)

Used Oil Training Program Signature Page

TRANSPORTER & PROCESSOR
I certify as a used oil transporter that the training program required under Rule 62-710.600, Florida Administrative Code, as described on the attached sheets will be implemented and adhered to. To the best of my knowledge, the training program described is in full compliance with the rule 62-710.600. (no pages are attached since the UAUOS Training manual is used)

JOHN R. FEAGLE VICE PRESIDENT

Name of Authorized Person (Print or Type)



Signature of Authorized Person

4/6/2000

Date

This document shall be submitted to the FDEP to facilitate review of the training program. If the UAUOS Certification Manual is to be used as the training manual, a copy of said manual need not be submitted with this document.

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The serial number of this manual is UOTCM 3/96

(NOTE: Please submit this page to FDEP with your renewal registration forms)