

Received

NOV 22 2010

BSHW

November 19, 2010

Mr. Bheem Kothur, P.E. III
Hazardous Waste Regulation
2600 Blair Stone Rd. MS 4560
Tallahassee, FL 32399-2400

RE: Water Recovery, LLC Used Oil Permit Renewal Application
EPA ID No. FLR 000 069 062; Used Oil Permit No. 79677-HO-07

Dear Mr. Kothur,

Water Recovery, LLC (WRI) applied for renewal of the above referenced permit on February 15, 2010. In response to NOD-1, WRI elected to submit a complete Part I and Part II application including all attachments under cover letter dated August 26, 2010. WRI received Department comments to this submittal on October 1, 2010 and responded to each item requested under cover letter dated October 7, 2010. WRI received additional Department comments in the form of NOD-3 on November 16, 2010 and has prepared this cover letter and attachments to address same.

1. Part C.3 – Operating Information. Please remove and replace the brief narrative overview of the facility operations with the attached narrative which has been labeled Revision 2 and dated November 18, 2010. Paragraph 4 of the narrative has been corrected to properly reference WRI Management Procedure 4900 for Petroleum Contact Water (PCW). This procedure has been attached and should be included as Section C.11 to your application binder. A labeled binder Tab has been included for your convenience.
2. Part C.4 – Used Oil Process Flow Plan, Management Procedure 4200. Please remove Revision 2 Dated August 20th, 2010 in its entirety and replace with the attached Revision 2 Dated November 18, 2010. Paragraph 2.4 of this procedure has been amended as requested.
3. Part C.8 – Unit Management Plan, Management Procedure 4700. The paragraph 3.2 reference contained an error. Please remove page 2 of Revision 2 dated August 20, 2010 and replace with the attached page 2 of Revision 2 dated November 18, 2010.
4. Part C.10 – Employee Used Oil Training Program. Please replace slides 4, 11 and 12 with the attached slides 4, 11 and 12 that have been modified as requested.



5. C.5 – Used Oil Waste Analysis Plan, Management Procedure 4100. Please remove Management Procedure 4100 Revision 2 dated August 20, 2010 in its entirety and replace with the attached Revision 2 dated November 19, 2010.
6. WRI has inserted “and mixtures of wastewater with oil that have a visible sheen” in paragraph 1.0 of Management Procedure 4100 which was revised in connection with comment item 5 above.

Please note that WRI has labeled application sections to correspond to the standard FDEP Application Form to the fullest extent possible. In error, WRI’s response to dated October 7, 2010 incorrectly referenced permit application attachments with a section/part “B” instead of “C”. In addition, section/part C.11 was incorrectly used for original signed and sealed engineer drawings instead of Management Procedure 4900 Petroleum Contact Water.

Please apply section/tab C.11 for Management Procedure 4900 and the new section/tab C.12 for the original engineer drawings. A replacement cover sheet C.9(a) for the engineers cost estimate located behind the Used Oil Facility Closure Plan in section has also been provided.

Once again, your assistance with this matter is greatly appreciated.

Kindest Regards,

Gregory Reynolds
Vice President & General Manager

Cc Mr. Ashwin Patel

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 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).

C.11

REPRODUCTION OF ORIGINAL

WALSLEY PHOTO SUPPLY

WATER RECOVERY, LLC

1819 Albert Street
Jacksonville, Florida 32202

PETROLEUM CONTACT WATER MANAGEMENT PROCEDURE

MANAGEMENT PROCEDURE 4900

REVISION: 2

<4900TP-1-1.DOC>

Prepared By:

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

Signature:



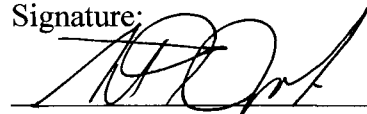
Date:

11/18/10

Approved By:

Steven T. Jenkins
President
Water Recovery, LLC

Signature:



Date:

11/18/2010

PETROLEUM CONTACT WATER

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FIGURE 1. WRI USED OIL FACILITY SITE PLAN

- ENCLOSURE (1) WRI WASTE PROFILE
- ENCLOSURE (2) PCW PRODUCER CERTIFICATION AND DOCUMENTATION
- ENCLOSURE (3) PCW WEEKLY INSPECTION RECORD
- ENCLOSURE (4) WRI INCOMING PCW SHIPMENT LOG
- ENCLOSURE (5) PCW TRANSFER AND PRODUCT RECOVERY FORM

1.0 DECLARATION OF INTENT

Water Recovery, LLC, herein referred to as “WRI,” has adopted this management procedure for petroleum contact water (PCW) destined for product recovery to help ensure that PCW is managed in a manner that is protective of human health and the environment, to encourage conservation of natural resources and to promote waste minimization. Adoption of this management procedure is intended to define when the PCW is managed as a recoverable material and when the PCW is regulated as a solid waste. WRI will process the PCW under the current FDEP Used Oil Processing Permit.

2.0 APPLICABILITY

This management procedure applies when PCW is transported or stored for the purpose of recovering product and to the recovery of product from PCW. This management procedure does not apply to other materials not meeting the definition of PCW or used oil, oily waste or other materials regulated under Chapter 62-710, F.A.C.

3.0 DEFINITIONS

The following definitions will be used for this procedure.

3.1 “Petroleum Contact Water” or “PCW” means water-containing product. Examples of materials that meet the definition of PCW or used oil include the following:

- Condensate from underground and aboveground petroleum tanks.
- Water bottoms or draw down water removed from a petroleum storage tank system as defined in Chapter 62-761 and 62-762, F.A.C.
- Product or water in contact with product which displays a visible sheen contained in spill containment areas associated with petroleum tank storage, petroleum transportation, and petroleum distribution systems; however, stormwater that displays a visible sheen contained in spill containment and secondary containment areas associated with a diesel or No. 2 fuel storage tank, transportation or distribution system is not PCW.
- Petroleum tank filler sump and dispenser sump water.
- Recovered product or water in contact with product (gasoline/benzene), which does not contain hazardous constituents other than petroleum (gasoline/benzene), from first response actions to petroleum spills or from petroleum contaminated site cleanups conducted under Chapter 62-770, F.A.C.

- Aboveground petroleum tank seal leakage water.
- The pumpable liquids removed from gasoline storage tanks during the first pump down operation of tank cleaning are PCW.

Examples of materials that do not meet the definition of PCW include the following:

- Equipment or vehicle wash water.
- Bilge water.
- Separated solids from tank cleaning operations.
- Groundwater contaminated with hazardous constituents other than PCW.
- Wastewaters regulated or permitted under other applicable Department rules or standards, such as Chapters 62-620 and 62-660, F.A.C.
- Wastewaters generated from cleaning gasoline tanks after the first pump down operation has been completed.
- Wastewater generated from tank washing operations from tanks that contained petroleum products other than gasoline.

- 3.2** “Petroleum refinery” means a location with a primary Standard Industrial Classification (SIC) code facility classification of 2911, Petroleum Refining.
- 3.3** “Producer” means any person, within the meaning of Section 403.703(4), F.S., by site, whose act or process generates PCW or whose act first causes PCW to become subject to regulation. This term includes owners and operators of storage tank systems regulated under Chapters 62-761 and 62-762, F.A.C., examples include owners and operators of retail service stations, convenience stores, wholesale product distribution facilities, product terminals, pipeline break-out tanks, and aboveground storage tanks where PCW is collected. A producer may recover product from PCW it produces or receives from another producer without being classified as a recovery facility.
- 3.4** “Product” means petroleum product as defined in Section 376.301(16), F.S. (1993) which, is a gasoline that has benzene as a hazardous constituent.
- 3.5** “Recovery Facility” means a facility that recovers product from PCW beyond the level of recovery obtained by a producer and meets the PCW management practices for recovery facilities. A recovery facility is not considered a producer, except for the PCW it may produce on site from its product storage tanks. WRI is the Recovery Facility in this management procedure.
- 3.6** “Site” means the contiguous land upon which a producer is located.
- 3.7** “Transporter” means a person who transports PCW off site by rail or over public roads.

4.0 GENERAL

WRI will receive PCW when properly profiled by the producer or generator. The WRI Waste Stream Profile and PCW Producer Certification and Documentation form are provided as enclosures (1) and (2). The waste received as PCW must meet the definition of PCW in Section 3.0 of this Management Procedure. The management and treatment of PCW will be completed in accordance with the requirements listed below.

- 4.1 A producer shall determine whether to recover product from PCW.
- 4.2 If a producer decides not to recover product from the PCW, or the PCW contains hazardous constituents above those found in the product that produced the PCW, the PCW is a solid waste and the producer of the PCW shall determine whether the PCW is hazardous waste in accordance with 40 CFR 262.11, as adopted by reference in Chapter 62-730, F.A.C.
- 4.3 A producer that has determined PCW to be a hazardous waste, and had determined not to recover product, shall manage the PCW in accordance with Chapter 62-730, F.A.C. **[PCW that had been determined to be a hazardous waste by the producer will not be transported, received, or processed by WRI.]**
- 4.4 A producer that has determined PCW to be non-hazardous, and has determined not to recover product is only subject to the provisions of Rule 62-740.040(4)(a) – (f), F.A.C., below, regarding the management and disposal of the PCW.
 - (a) Transporting and disposing of the PCW off site at a Publicly Owned Treatment Works (POTW) subject to regulation under section 402 or section 307(b) of the Clean Water Act, as amended, or other facility permitted by the Department;
 - (b) Transporting and disposing of the PCW off site at a pre-treatment facility connected to a POTW subject to regulation under section 402 or section 307(b) of the Clean Water Act, as amended; [WRI will pretreat the PCW water phase in accordance with the current Industrial Waste Water Pretreatment Permit issued by the Jacksonville Electric Authority (JEA).]
 - (c) Transporting or piping the PCW to an onsite treatment facility permitted by the Department, the United States Environmental Protection Agency, or certified, pursuant to Chapter 403, Part II, Florida Statutes and Chapter 62-17, F.A.C.;
 - (d) Transporting or piping the PCW to an on site storage or slop tank;
 - (e) Transporting the PCW to a recovery facility that meets the requirements of this Management Procedure; or
 - (f) Transporting the PCW to a facility which has a currently valid industrial waste permit, air operating permit or other local, state or federal permit,

provided that the PCW is managed at the facility in a manner to prevent any violation of Department groundwater, surface water and air emissions standards.

- 4.5 If a producer decides to recover product or have product recovered from PCW, the producer must maintain the enclosure (2) documentation, which includes documentation of process knowledge or test results to demonstrate that the PCW:
 - (a) Contains a recoverable product,
 - (b) Is managed as a product,
 - (c) Undergoes product recovery,
 - (d) Is managed in accordance with the applicable PCW management practices, and
 - (e) Does not contain levels of hazardous constituents above those found in the source of the PCW.

- 4.6 Methods used for recovery of product in PCW include the following:
 - (a) Phase separation of product from PCW by the producer.
 - (b) Use of one or more oil/water separators by the producer.
 - (c) Use of available technology on site by the producer beyond oil/water separators (e.g. centrifuge, filter press, thermal desorption, etc.).
 - (d) Shipment of PCW to and reintroduction of PCW into a petroleum refinery.
 - (e) Recovery of product from PCW at a recovery facility.

- 4.7 If a producer conducts initial on site recovery of product from PCW by one or more of the methods in paragraph (4.6) above and determines not to recover additional product the producer is subject to and must comply with paragraphs (4.2), (4.3) and (4.4) of this section.

- 4.8 PCW managed for the recovery of product in accordance with the management standards contained in this Chapter is not a solid waste as defined in 40 CFR Part 261.2.

- 4.9 PCW Handling Narrative
 - 4.9.1 PCW waste streams will be identified in the waste stream approval process. WRI will not accept waste streams without prior written approval. See Section 4.0. The PCW generators will be required to complete the WRI Waste Stream Profile enclosure (1) along with the enclosure (2) PCW Producer Certification and Documentation Form.
 - 4.9.2 Upon arrival, the truck will be sampled with a coliwasa sampler and analyzed for the appropriate fingerprint parameters (same parameters for used oil – See Attachment 5.0)
 - 4.9.3 PCW that meets the profile parameters and is accepted will be offloaded into Tank 7P which has been designated for PCW only.

A portion of the PCW waste streams received is expected to have flash point less than 140 degrees Fahrenheit.

- 4.9.4 The pump and lines may be flushed with 150 percent of the line volume of clean water prior to the transfer of any non-PCW.
- 4.9.5 The PCW in Tank 7P (20,000 gallons) will be allowed to gravity separate. Periodically, the water fraction will be removed for treatment in WRI's on site industrial wastewater treatment system. The product layer will accumulate in Tank 7P and will periodically be recovered and sold.
- 4.9.6 Records of PCW receipts and all product sales will be kept as per Section 7.0. Weekly inspections will be completed on the enclosure (3) form. Records are kept in WRI's Access database. The reports for receipts and/or product sales can be printed out as a report out of the database at anytime. This database is backed up on tape at the end of each normal day shift. Enclosures (4) and (5) show the general layout of these reports.

5.0 MANAGEMENT PRACTICES FOR PROCEDURES OF PCW FOR PRODUCT RECOVERY

WRI will remove PCW from the producer(s) tank that are marked with the words "**Petroleum Contact Water**" and the date of last removal. PCW generated by WRI will be managed in accordance with this procedure as a producer.

5.1 If subject to regulation under Chapters 62-761 or 62-762, F.A.C., a producer shall register with the Department PCW storage tanks, which are not those tanks in which PCW is initially produced and shall manage such PCW storage tanks in accordance with those chapter rules. These PCW storage tanks must be clearly labeled or marked with the work "**Petroleum Contact Water.**" A producer may either maintain on site records that reflect accumulation and removal dates of PCW from such storage tanks or clearly mark the PCW storage tanks with the date when PCW accumulation first begins after the existing PCW in the storage tank has been removed.

5.2 A producer that stores PCW in containers or tanks that are not required to be registered under Chapter 62-761 or 62-762, F.A.C., shall:

- (a) Ensure that the container or tank is made of or lined with material that is compatible with PCW;
- (b) Keep the container or tank closed and stored in a safe manner;
- (c) Label or mark the container or tank clearly with the words "Petroleum Contact Water" and the date when PCW accumulation first begins after the existing PCW in the container or tank has been removed;
- (d) Not handle the container or tank in a manner that may rupture it or cause it to leak; and

(e) Inspect the container or tank for leaks and deterioration at least weekly using the enclosure (3) form.

- 5.3 A producer shall not store PCW in containers or tanks for more than 180 days. Producers utilizing continuous in out output tanks may demonstrate compliance with this paragraph by maintaining inventory records showing throughout of more than 100% of the tank capacity or the in-put PCW during a 180-day period.
- 5.4 A produce shall include a shipping paper with each off site shipment of PCW. The shipping paper shall identify the PCW as "Petroleum Contact Water."
- 5.5 A producer shall notify the recovery facility receiving its PCW that the PCW does not contain levels of hazardous constituents above those found in the source of the PCW using the enclosure (2) form.
- 5.6 A producer with an onsite product storage capacity of less than 95,000 gallons shall maintain records of the following PCW related activity for 3 years and shall make the records available to the Department upon five working days of notice if records are not maintained on site. A producer with an on site product storage capacity of 95,000 gallons or more shall maintain records of the following PCW related activity for 3 years, shall maintain these records on site, and shall make these records available to the Department upon request. On site recorded retention may include the use of electronic media such as computers, telephone facsimiles. Records shall include the following information using the enclosure (4) form:
- (a) Date and volume of the PCW removed from the product or PCW tank and shipped off site.
 - (b) Names and addresses of transporters shipping PCW off site.
 - (c) Name and address of the PCW receiving facility destination.
 - (d) A copy of the shipping paper included with each shipment of PCW.
 - (e) A copy of the written statement provided to the receiving facility from the producer that the PCW does not contain levels of hazardous constituents above those found in the source of the PCW.
 - (f) Copies of weekly container or tank inspections required under paragraph (5.2)(e) of this section.
- 5.7 If the producer ships PCW within Florida. The producer shall only ship PCW to another producer, a petroleum refinery, a recovery facility that meets the PCW management practices, or a permitted hazardous waste facility.
- 5.8 If a producer ships PCW outside Florida, the producer and transporter will be subject to the receiving state's laws and regulations pertaining to the management of PCW upon leaving the State of Florida. Within the boundaries of the State of Florida, the producer and transporter must maintain compliance with Chapter 62-740, F.A.C.
- 5.9 A producer shipping PCW off site by rail or over public roads for recovery shall use a hazardous waste transporter or a transporter who has received a

DEP/EPA ID number by notifying the Department on EPA Form 8700-12 of its intent to transport PCW.

5.10A producer shall not mix or commingle PCW with any other material not identified in paragraph 62-740.030(1)(a), F.A.C., or defined as PCW.

6.0 MANAGEMENT PRACTICES FOR TRANSPORTERS **SHIPPING PCW FOR PRODUCT RECOVERY**

WRI will require transporters that bring PCW to its facility to operate in accordance with this management procedure.

- 6.1 Compliance with Section shall not excuse the transporter from compliance with other applicable Florida laws and Florida Department of Transportation rules and regulations.
- 6.2 The transporter must have already received a DEP/EPA ID number by notifying the Department on EPA Form 8700-12 and the transporter must have notified the Department of its intent to transport.
- 6.3 A subcontract transporter who is not a producer and who does not engage in the ultimate recovery of product from PCW shall not store PCW for more than 35 days prior to delivery to WRI.
- 6.4 WRI is a treatment facility that stores PCW in tank number 7P as shown in Figure (1) will keep this tank registered in accordance with Chapter 62-761 or 62-762, F.A.C. and will manage the tank in accordance with the applicable requirements for the storage of pollutants as specified in the above Chapters.
- 6.5 WRI will keep an operating record of the following PCW related activities for 3 years and make the records available to the Department upon request using the enclosure (4) form:
 - (a) Name and location of the person shipping the PCW.
 - (b) Date the PCW was picked up.
 - (c) Volume of the PCW transported.
 - (d) Name and location of the person receiving the PCW.
 - (e) Delivery date of the PCW.
 - (f) A copy of the shipping paper used for the shipment of the PCW.

7.0 MANAGEMENT PRACTICES FOR RECOVERY FACILITIES

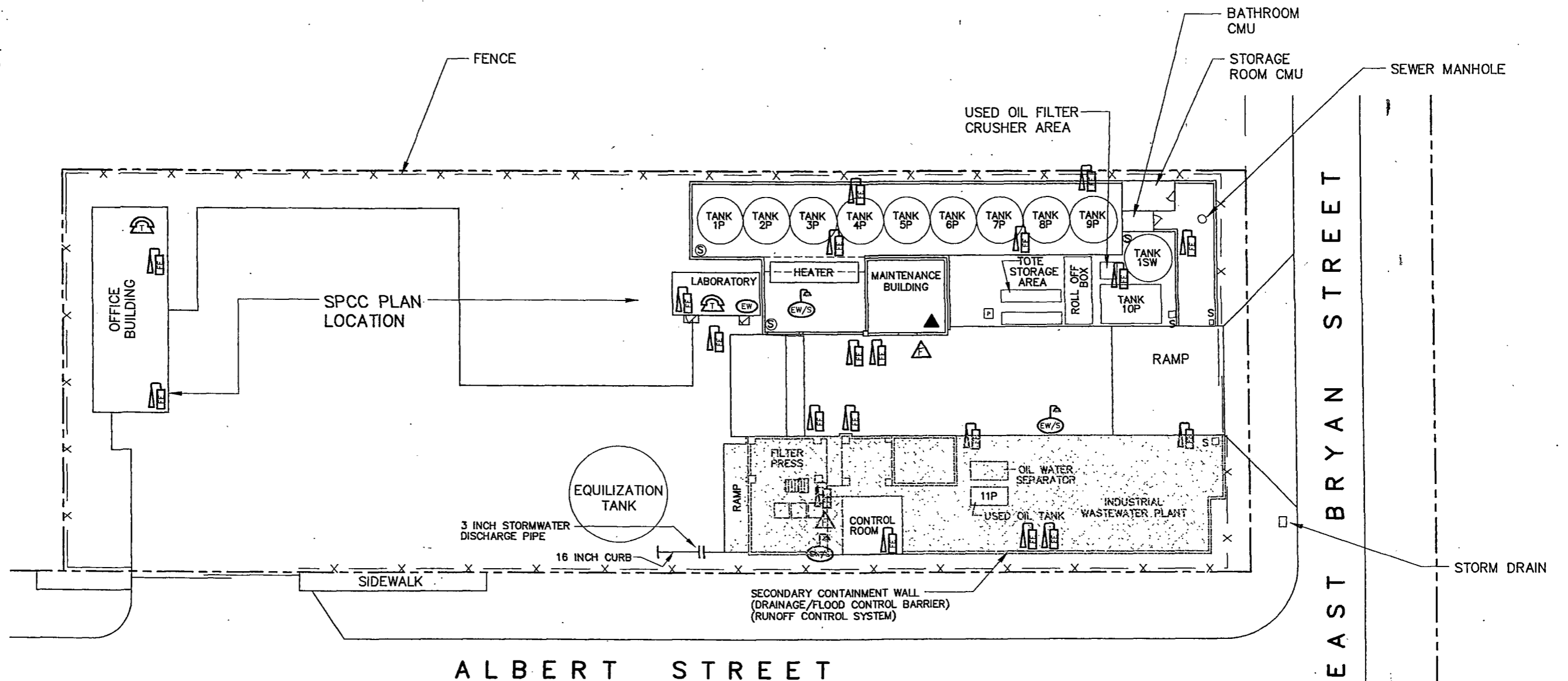
WRI will follow these management practices for operation of the Recovery Facility. Tank number 7P will be used to store the PCW at WRI. The pipe from the offload manifold to tank 7P may be flushed with water at 150 percent of the line volume into the PCW tank to ensure that the PCW is transferred into the tank and that residuals do not remain in the line. The line flush may be completed prior to the line being used for another transfer other than PCW. The line need not be flushed between consecutive PCW transfers.

- 7.1 A recovery facility receiving PCW shall:
- (a) Obtain a hazardous waste facility operation permit in accordance with Rule 62-730.200 and 62-730.231, F.A.C.; or
 - (b) Qualify for an exemption from the hazardous waste permitting process, pursuant to Rule 62-730.270(1)(a)-(c), F.A.C.; or
 - (c) Obtain a used oil processing general permit in accordance with Section 62-710.800, F.A.C., except for paragraphs 62-710.800(5) and (6). For the purpose of this management procedure, the words “used oil” shall mean “PCW” and the phrase “used oil processing facility” shall mean “PCW recovery facility.”
- 7.2 WRI recovery facility will meet the following requirements:
- (a) Store PCW in registered tank number 7P in accordance with the applicable requirements for the storage of pollutants as specified in Chapter 62-761 or 62-762, F.A.C.
 - (b) WRI will maintain records of the following PCW related activities for each shipment of PCW received for a minimum of three years, maintain the records on site and make the records available to the Department upon request using the enclosure (4) form:
 - 1. Name and address of the PCW producer.
 - 2. Name and address of the PCW transporter.
 - 3. Date of receipt of the PCW shipment.
 - 4. Volume of PCW received.
 - 5. A copy of the shipping paper used for shipment of the PCW.
 - 6. Documentation of weekly container or tank inspections required in Rule 62-740.100(2)(e), F.A.C.
- 7.3 WRI’s recovery facility will be able to demonstrate to the Department by operating procedures or records kept on site that, under normal operating practices, it recovers product from PCW. The recovery of product from the PCW will be by gravity separation in tank number 7P. WRI may also use specialty filtration equipment to further remove solids or water contamination from the product. The water will be transferred from tank number 7P to an industrial wastewater treatment tank for processing under the JEA pretreatment permit. The level of the product remaining in tank 7P will be measured by manual gauging or by mechanical measurement and recorded on the enclosure (5) form. The quantity of recovered product will be recorded on enclosure (5) and will be reported in the annual PCW report in accordance with F.A.C. 62-740.300(5).
- 7.4 WRI’s recovery facility will obtain written assurances on enclosure (2) from the producer that the PCW does not contain levels of hazardous constituents above those found in the source of the PCW. These written assurances must be maintained by the recovery facility for 3 years.

- 7.5 WRI will maintain records documenting quantities of product recovered from PCW and submit a report to the Department by March 1 of each year. The report shall include the total quantity of PCW received and an estimate of the total quantity of product recovered from the PCW during the previous calendar year.
- 7.6 WRI will test and manage all waste residuals after the recovery of product as appropriate in accordance with Chapter 62-730, F.A.C., or other applicable rules of the Department. A written waste determination will be made on the waste residuals generated after the recovery of product has been completed on an annual basis, or as necessary to facilitate maintenance, internal cleaning or sludge removal from tank 7P. The waste residuals will be tested using the TCLP test for benzene to determine if the waste stream is a hazardous or nonhazardous waste.



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:
 ENVIRONNERING, 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.



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	<input type="checkbox"/> >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	<input type="checkbox"/> 10-12.5
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	<input type="checkbox"/> >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 Only Approved? <input type="checkbox"/> Yes <input type="checkbox"/> No By: _____ Date: _____ Approval Number: _____
--



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)

PETROLEUM CONTACT WATER (PCW) WEEKLY INSPECTION RECORD

Authorized Inspectors: _____

Site Location: _____

Inspection Date: _____

Inspection Time: _____

COMPANY NAME: _____

Inspector's Initials: _____

Site Status: _____

INSPECTION ELEMENTS:

1. Check all drums for leaks/tanks, corrosion, bulging, etc.
2. Ensure all drums/tanks are closed and stored in secondary containment.
3. Make sure there is aisle space between rows of drums.
4. Ensure ground straps available and unsealed containers of ignitables are grounded.
5. Ensure all drums/tanks are marked with the words "Petroleum Contact Water"
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.

THIS FORM IS TO BE USED TO INSPECT PCW CONTAINERS OR TANKS THAT ARE NOT REQUIRED TO BE REGISTERED UNDER F.A.C. 62-761 or 62-762.

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

WRI INCOMING PCW SHIPMENT LOG

ENTRY NUMBER	PRODUCER NAME	PRODUCER ADDRESS	DELIVERING TRANSPORTER NAME	TRANSPORTER ADDRESS	TRANSPORTER EPA ID NUMBER	GENERATOR NAME	GENERATOR EPA ID NUMBER	QUANTITY PCW ACCEPTED	ACCEPTANCE DATE	DATE SHIPPED BY PRODUCER	DATE REMOVED FROM TANK
1		-----		-----							
2		-----		-----							
3		-----		-----							
4		-----		-----							
5		-----		-----							
6		-----		-----							
7		-----		-----							
8		-----		-----							
9		-----		-----							
10		-----		-----							
11		-----		-----							
12		-----		-----							
13		-----		-----							
14		-----		-----							
15		-----		-----							
16		-----		-----							
17		-----		-----							
18		-----		-----							
19		-----		-----							
20		-----		-----							
21		-----		-----							
22		-----		-----							

ENCLOSURE (4)

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

RETAIN THIS DOCUMENT FOR AT LEAST 3 YEARS.

<WRI-4900-1.XLS>

RECEIVING FACILITY:
 WATER RECOVERY, INC.
 1819B ALBERT STREET
 JACKSONVILLE, FL

WATER RECOVERY, INCORPORATED

PETROLEUM CONTACT WATER (PCW) TRANSFER AND PRODUCT RECOVERY FORM

1. GENERATOR NAME/(S): _____

2. MANIFEST NUMBER(S) PCW RECEIVED UNDER: _____

3. TRANSFER WATER FROM PCW TANK P7 AND RECORD VOLUME OF
PRODUCT REMAINING IN TANK.

4. VOLUME OF PRODUCT REMAINING IN TANK P7 (GALLONS).

5. PRODUCT TRANSFERRED TO TANK P8:
RECORD VOLUME REMAINING IN TANK P7 (GALLONS)

6. VOLUME TRANSFERRED TO TANK P8:
SUBTRACT LINE 5 FROM LINE 4 : _____

7. PRODUCT TRANSFERRED TO TANK P9:
RECORD VOLUME REMAINING IN TANK P7 (GALLONS)

6. VOLUME TRANSFERRED TO TANK P9:
SUBTRACT LINE 7 FROM LINE 4 : _____

NAME (PRINTED): _____

SIGNATURE: _____

TITLE: _____ DATE: _____

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:

11/18/10

Approved By:

Steven T. Jenkins
President
Water Recovery, LLC

Signature:



Date:

11/18/2010

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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 facility for disposal or metal recycling. Used oil residuals will be received and consolidated or shipped directly off site to a recycling facility. 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)]

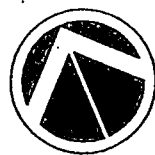
The WRI yard drainage is to the south side of the property. The drainage along Albert Street is to the east. A single storm drain is located at the southeast corner of the facility. The storm drain flows to the north and then to the east at the back of the property along Bryan Street. The drainage is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

3.6 Runoff Control System [4(f)]

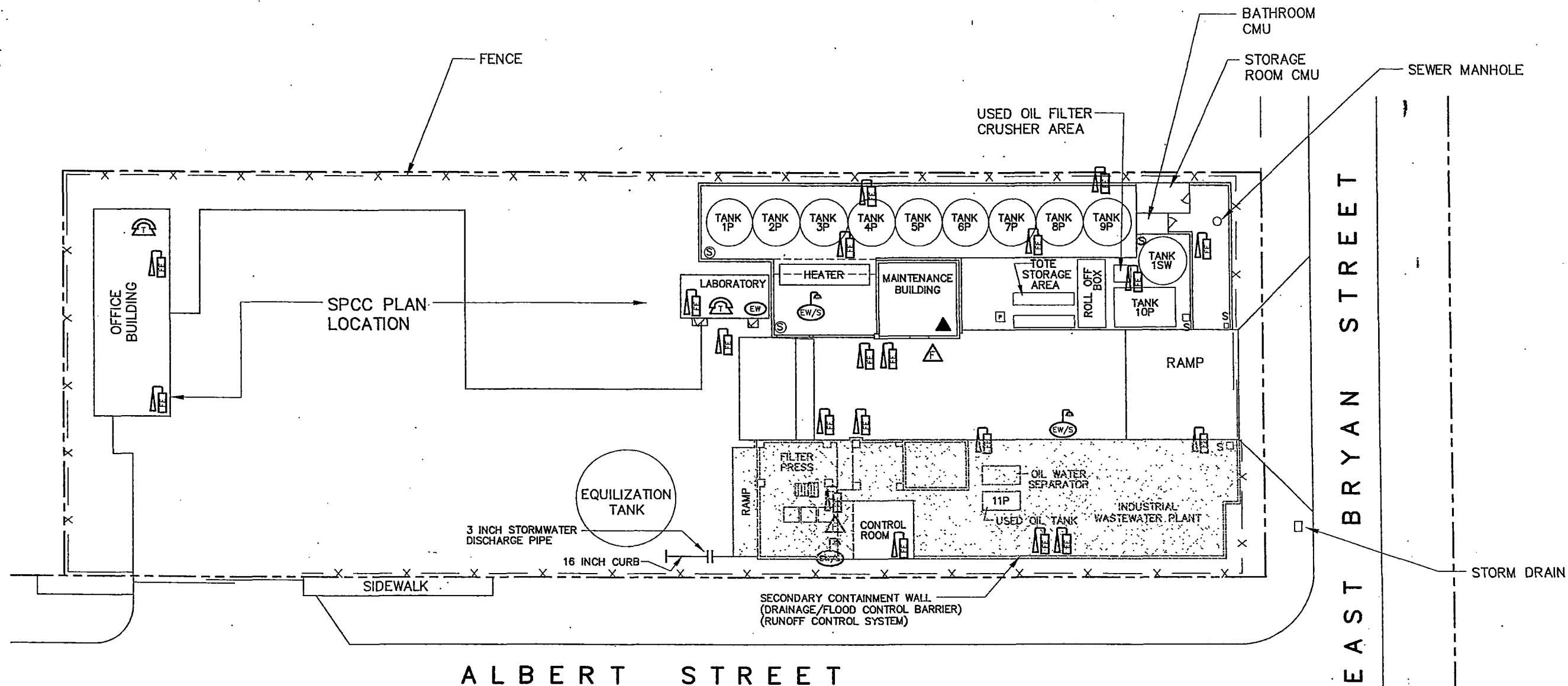
The WRI yard drainage is to the south side of the property. The storm drain flows to the north and then to the east at the back of the property along Bryan Street. The rainwater that falls into the processing area is collected in the secondary containment system. The stormwater that collects in the secondary 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

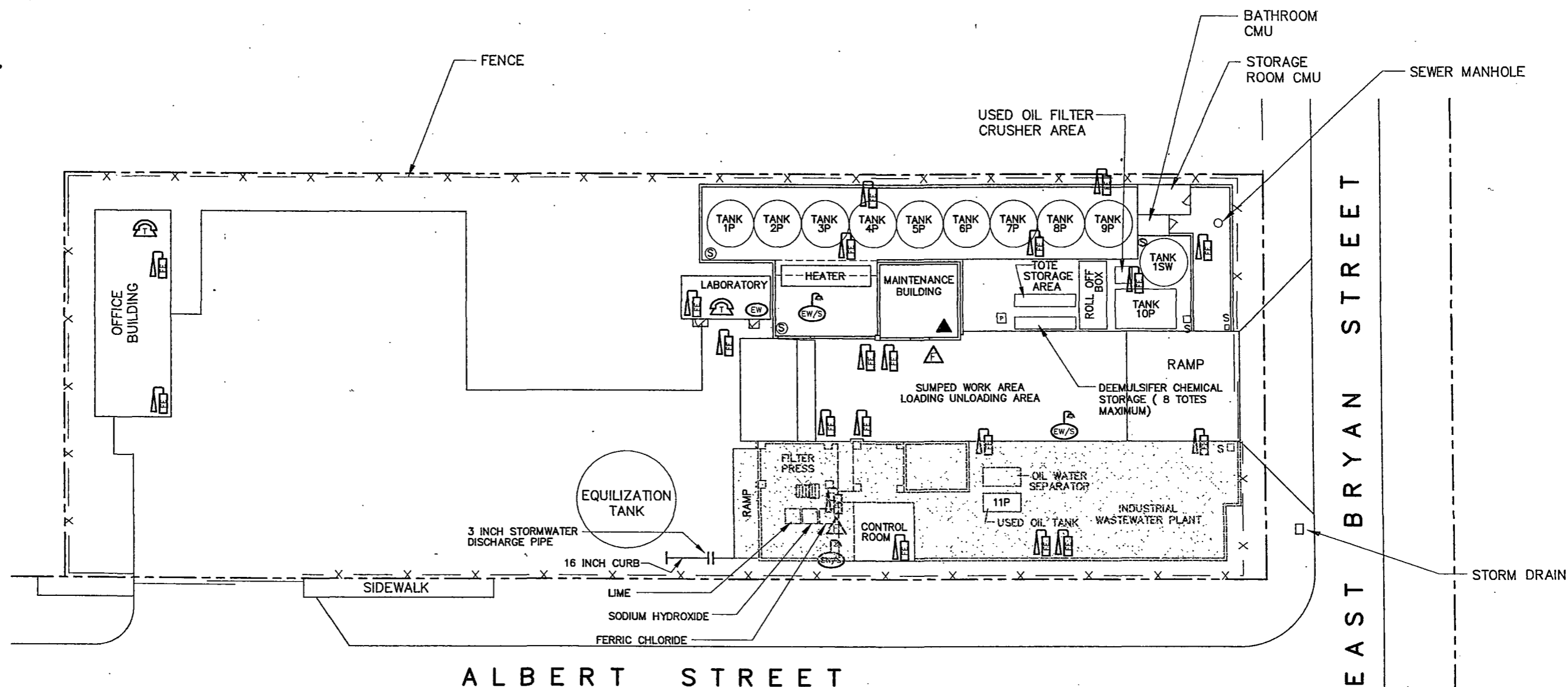
TANK NUMBER	CAPACITY (GALLONS)	CONTENTS OF TANK
1P	23,232	USED OIL
2P	23,232	USED OIL
3P	23,232	USED OIL
4P	21,445	USED OIL
5P	20,778	USED OIL
6P	25,806	USED OIL
7P	21,446	PETROLEUM CONTACT WATER
8P	21,446	INDUSTRIAL WASTEWATER/ PETROLEUM PRODUCTS
9P	20,833	INDUSTRIAL WASTEWATER/ PETROLEUM PRODUCTS
10P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

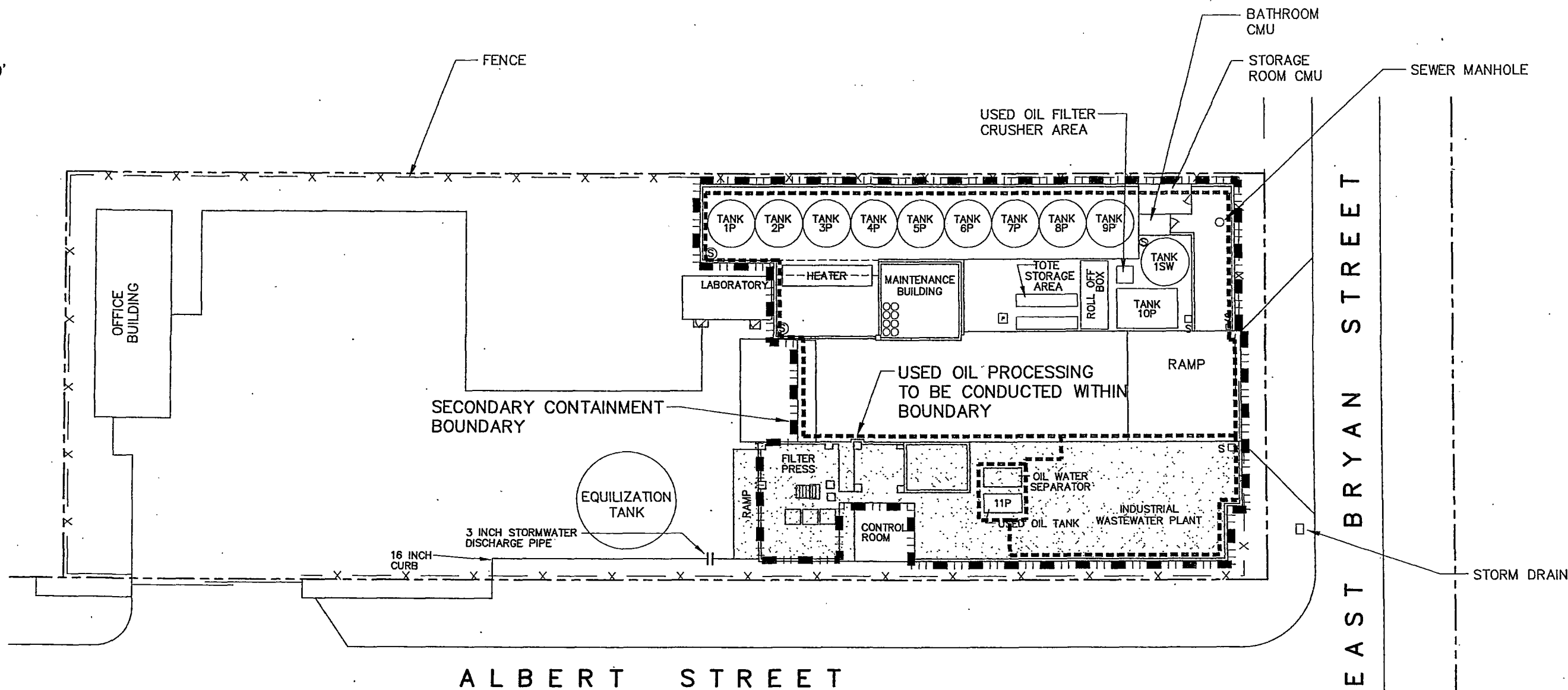
- SPILL KIT
- FIRE EXTINGUISHER
- TELEPHONE
- EMERGENCY EYEWASH/SHOWER
- EMERGENCY SHOWER
- FIRE ALARM / AIR HORN

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	_____ 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) _____

ENCLOSURE (1)

Don't Forget Page 2 →



Water Recovery, LLC Waste Stream Profile

Used Oil Characteristics

Analytical data available? (Please attach)

Characteristic	Actual	Range				
		<input type="checkbox"/> < 140	<input type="checkbox"/> 141-200	<input type="checkbox"/> > 200		
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	<input type="checkbox"/> >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	<input type="checkbox"/> 10-12.5
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	<input type="checkbox"/> >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	Concentration (mg/L)
Arsenic <input type="checkbox"/>	
Cadmium <input type="checkbox"/>	
Chromium <input type="checkbox"/>	
Lead <input type="checkbox"/>	
Total Organic Halogens <input type="checkbox"/>	
PCBs <input type="checkbox"/>	
Other <input type="checkbox"/>	

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) _____

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 Only

Approved? Yes No By: Gregory Reynolds Date: _____ Approval Number: _____

Hazardous Waste Classification Fact Sheet

Listed Wastes

A waste is classified as hazardous if it is generated by a specific industrial processes and/or industrial sectors that is included in the F, K, P, or U lists summarized below:

The F List (40 CFR 261.31):

The F List contains wastes from common industrial processes including:

- Spent solvents
- Electroplating/metal finishing waste
- Dioxin-bearing waste
- Chlorinated aliphatic hydrocarbons production
- Wood preserving waste
- Petroleum refinery wastewater treatment sludge
- Multisource leachate

The K List (40 CFR 261.32)

The K list contains wastes from specific industrial categories including:

- Wood preservation
- Organic chemicals manufacturing
- Petroleum refining
- Primary copper production
- Primary zinc production
- Ferroalloys production
- Veterinary pharmaceuticals manufacturing
- Inorganic pigment manufacturing
- Inorganic chemicals manufacturing
- Explosives Manufacturing
- Iron and steel production
- Primary lead production
- Primary aluminum production
- Secondary lead processing
- Ink formulation
- Coking (processing coal to produce coke)

The P and U Lists (40 CFR 261.33)

The P and U Lists designate as hazardous waste pure and commercial grade formulations of certain unused chemicals.

Characteristic Wastes

A waste is also characterized as hazardous if it meets the criteria for any of the hazardous waste "characteristics" summarized below:

Ignitability (40 CFR 261.21)

This characteristic identifies wastes that can readily catch fire and sustain combustion. Liquid wastes with a flash point below 140 °F are generally considered ignitable.

Corrosivity (40 CFR 261.22)

This characteristic identifies wastes that are acidic or alkaline (basic). Aqueous wastes with a pH below 2 or greater than 12.5 are generally considered corrosive

Reactivity (40 CFR 261.23)

This characteristic identifies wastes that readily explode or undergo violent reactions. In many cases there is no reliable test method to evaluate a waste's potential to explode or react violently under common handling conditions.

Toxicity (40 CFR 261.24)

This characteristic identifies wastes that leach toxic compounds when disposed of in a land disposal unit. Wastes can be tested using the Toxicity Characteristic Leaching Procedure (TCLP). The waste is classified as toxic if any of 40 different toxic chemicals are present above specified regulatory concentrations. These regulatory concentrations are presented in the attached table.

Additional Notes

Mixture Rule – A combination of a listed waste with nonhazardous solid waste (regardless of amounts), is regulated as a listed waste.

Derived-From Rule – Any material derived from a listed hazardous waste is also a listed hazardous waste. This applies to residues (ash, sludge, etc.) from the treatment of hazardous waste.

The information on this fact sheet is paraphrased from Section III of Managing Hazardous Waste – RCRA Subtitle C (BPA XXX-XXXX). The information on this fact sheet should not replace a thorough review of 40 CFR 261.

TCLP Regulatory Levels

(40 CFR 261.24 – Table 2)

Waste Code	Contaminant	Concentration (mg/L)
D004	Arsenic	5.0
D005	Barium	100.0
D018	Benzene	0.5
D006	Cadmium	1.0
D019	Carbon tetrachloride	0.5
D020	Chlordane	0.03
D021	Chlorobenzene	100.0
D022	Chloroform	6.0
D007	Chromium	5.0
D023	o-Cresol	200.0
D024	m-Cresol	200.0
D025	p-Cresol	200.0
D026	Total Cresols*	200.0
D016	2, 4-D	10.0
D027	1,4-Dichlorobenzene	7.5
D028	1,2-Dichloroethane	0.5
D029	1,1-Dichloroethylene	0.7
D030	2,4-Dinitrotoluene	0.13
D012	Endrin	0.02
D031	Heptachlor (and its epoxide)	0.008
D032	Hexachlorobenzene	0.1
D033	Hexachlorobutadiene	0.5
D034	Hexachloroethane	3.0
D008	Lead	5.0
D013	Lindane	0.4
D009	Mercury	0.2
D014	Methoxychlor	10.0
D035	Methyl ethyl ketone	200.0
D036	Nitrobenzene	2.0
D037	Pentachlorophenol	100.0
D038	Pyridine	5.0
D010	Selenium	1.0
D011	Silver	5.0
D039	Tetrachloroethylene	0.7
D015	Toxaphene	0.5
D040	Trichloroethylene	0.5
D041	2,4,5-Trichlorophenol	400.0
D042	2,4,6-Trichlorophenol	2.0
D017	2,4,5-TP (Silvex)	1.0
D043	Vinyl Chloride	0.2

* if o-, m-, and p-cresols cannot be individually measured, the regulatory level for total cresols is used.

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: _____

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 Facility Closure Plan, Revision 2, Management Procedure 4800, dated August 5, 2010 is included under section C.9. 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.



WRI Interpretation

- All wastes manifested with the description “used oil” or “petroleum contact water” is handled as used oil regardless of oil content
- All mixtures of wastewater that with oil that have a visible sheen of oil are handled as used oil regardless of description
- Wastes manifested with the descriptions such as “oily wastewater” are handled as used oil if they have a visible sheen



Federal Rules cont'd

- 40 CFR, Part 279.45 Used Oil Transporters are subject to all applicable Spill Prevention, Control and Countermeasures requirements
- 40 CFR, Part 279.46 Transporters must keep records of all used oil accepted and delivered for three years. The records must include the name, address, EPA identification number and signature of the person who provided or accepted the used oil, the quantity of used oil handled and the date of delivery



WRI Specific Information

- All incoming used oil loads (including PCW) are tested for all fingerprint parameters; flashpoint, TOX, pH, solids content, and oil content
- Petroleum Contact Water (PCW) is only offloaded into Tank 7P
- Construction cones and grounding strap are required for all PCW offloads
- Used oil is only offloaded into Tanks 1P-10P (black tanks)

WATER RECOVERY, LLC

1819 Albert Street
Jacksonville, Florida 32202

USED OIL WASTE ANALYSIS PLAN

MANAGEMENT PROCEDURE 4100

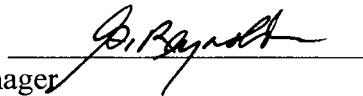
REVISION: 2

<4100TP-5.WPS>

Prepared By:

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

Signature:



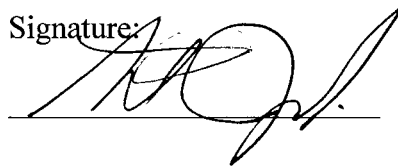
Date:

11/19/10

Approved By:

Steven T. Jenkins
President
Water Recovery, LLC

Signature:



Date:

11/19/2010

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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, and mixtures of wastewater with oil that have a visible sheen. 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.

When WRI relies solely on generator knowledge, or “acceptable knowledge” which may be data supported “process knowledge”, to approve a waste determination, additional verification and documentation will be completed.

- WRI personnel may become familiar with the generator’s processes by site visits, sampling data, and or other information
- Waste analysis data contained in documented studies from the generator must be based on valid sampling and analytical techniques
- Process descriptions and documented studies from the generator should be reviewed to determine if any significant differences exist between the processes described in the studies and those actually employed by the generator
- Requested data supporting generator knowledge of waste determination that is provided to WRI will be attached to the Waste Profile Form and kept on file at the Water Recovery, LLC site

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. In this case the required analyses will be performed by a National Environmental Laboratory Accreditation Program (NELAP) Certified Laboratory. 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 information that will be used to determine the halogen content of the used oil will be 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 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 waste analysis to make the used oil on specification 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 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				
		<input type="checkbox"/> < 140	<input type="checkbox"/> 141-200	<input type="checkbox"/> > 200		
Flash Point (Closed Cup - °F)		<input type="checkbox"/> < 1	<input type="checkbox"/> 1-5	<input type="checkbox"/> 6-10	<input type="checkbox"/> 11-20	<input type="checkbox"/> >20
Total Solids (%)		<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
pH (<2 or >12.5 is hazardous)		<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	<input type="checkbox"/> >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	Concentration (mg/L)
Arsenic <input type="checkbox"/>	
Cadmium <input type="checkbox"/>	
Chromium <input type="checkbox"/>	
Lead <input type="checkbox"/>	
Total Organic Halogens <input type="checkbox"/>	
PCBs <input type="checkbox"/>	
Other <input type="checkbox"/>	

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) _____

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 Only Approved? <input type="checkbox"/> Yes <input type="checkbox"/> No By: _____ Date: _____ Approval Number: _____
--



Water Recovery, LLC

WRI WASTE
TRACKING FORM

TIME IN _____
TIME OUT _____

DATE: _____ | 2010 Transporter: _____ Trans Route _____

LOAD #

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)

OIL TYPE CODE: _____ **OIL END USE CODE:** _____

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 #: _____ **Oil Type Code:** _____

Transporter: _____

Transporter EPA ID#: _____

Customer: _____ **End Use Code:** _____

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:

C.12 Sealed Eng Drawings

Attachment

C.9.(a)