

APPLICATION FORM FOR A USED OIL PROCESSING FACILITY PERMIT

Part I

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

A. General Information

1. New _____ Renewal ☒ Modification _____ Date old permit expires Mar 26, 19

2. Revision number 1.0

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

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

4. Date current operation began: 1-1-2006

5. Facility name: Fuels Unlimited Inc. (D.B.A. Oils Unlimited)

6. EPA identification number: FLR 000050369

7. Facility location or street address: 509 South French Avenue, Sanford, FL 32771

8. Facility mailing address:
PO Box 259 Sanford FL 32771
Street or P.O. Box City State Zip Code

9. Contact person: Ronald C. Patterson Telephone: (407)302-3193
Title: Owner
Mailing Address:
Same as above
Street or P.O. Box City State Zip Code

10. Operator's name: Same as above Telephone: ()
Mailing Address:
Street or P.O. Box City State Zip Code

11 Facility owner's name: _____ Telephone: ()
Mailing Address:
Street or P.O. Box City State Zip Code

12 Legal structure:
☒ corporation (indicate state of incorporation) FL
_____ individual (list name and address of each owner in spaces provided below)
_____ partnership (list name and address of each owner in spaces provided below)
_____ other, e.g. government (please specify) _____

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

Name: _____
Mailing Address: _____

Street or P.O. Box _____ City _____ State _____ Zip Code _____

Name: _____
Mailing Address: _____

Street or P.O. Box _____ City _____ State _____ Zip Code _____

Name: _____
Mailing Address: _____

Street or P.O. Box _____ City _____ State _____ Zip Code _____

Name: _____
Mailing Address: _____

Street or P.O. Box _____ City _____ State _____ Zip Code _____

- 13 Site ownership status: ☒ owned ☐ to be purchased ☐ to be leased _____ years
☐ presently leased; the expiration date of the lease is: _____

If leased, indicate:

Land owner's name: _____

Mailing Address: _____

Street or P.O. Box _____ City _____ State _____ Zip Code _____

- 14 Name of professional engineer Nicolas E. Andreyev Registration No. 35459

Mailing Address: 4055 St. Johns Parkway Sanford FL 32771

Street or P.O. Box _____ City _____ State _____ Zip Code _____

Associated with: Andreyev Engineering, Inc.

B. SITE INFORMATION

1. Facility location:

County: Seminole

Nearest community: _____

Latitude: 28 47' 27" Longitude: 81 16' 22"

Section: 25 Township: 19S

UTM # _____ / _____ / _____

Range: 30E

2. Facility size (area in acres): 0.39

3. Attach a topographic map of the facility area and a scale drawing and photographs of the facility showing the location of all past, present and future material and waste receiving, storage and processing areas, including size and location of tanks, containers, pipelines and equipment. Also show incoming and outgoing material and waste traffic pattern including estimated volume and controls.

C. OPERATING INFORMATION

1. Hazardous waste generator status (SQG, LQG) N/A

2. List applicable EPA hazardous waste codes:

N/A No Hazardous Waste Stored On-Site

3. Attach a brief description of the facility operation, nature of the business, and activities that it intends to conduct, and the anticipated number of employees. No proprietary information need be included in this narrative.

A brief description of the facility operation is labeled as Attachment 1

4. Attach a detailed description of the process flow should be included. This description should discuss the overall scope of the operation including analysis, treatment, storage and other processing, beginning with the arrival of an incoming shipment to the departure of an outgoing shipment. Include items such as size and location of tanks, containers, etc. A detailed site map, drawn to scale, should be attached to this description. (See item 4, page 4).

The facility's detailed process description is labeled as Attachment 2

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

a. An analysis plan which must include:

- (i) a sampling plan, including methods and frequency of sampling and analyses;
- (ii) a description of the fingerprint analysis on incoming shipments, as appropriate; and
- (iii) an analysis plan for each outgoing shipment (one batch/lot can equal a shipment, provided the lots are discreet units) to include: metals and halogen content.

The analysis plan is labeled as Attachment 3

b. A description of the management of sludges, residues and byproducts. This must include the characterization analysis as well as the frequency of sludge removal.

Sludge, residue and byproduct management description is labeled as Attachment 4

c. A tracking plan which must include the name, address and EPA identification number of the transporter, origin, destination, quantities and dates of all incoming and outgoing shipments of used oil.

The tracking plan is included as Attachment 5

6. Attach a copy of the facility's preparedness and prevention plan. This requirement may be satisfied by modifying or expounding upon an existing SPCC plan. Describe how the facility is maintained and operated to minimize the possibility of a fire, explosion or any unplanned releases of used oil to air, soil, surface water or groundwater which could threaten human health or the environment. (See item 6, page 5).

The preparedness and prevention plan is labeled as Attachment 6

7. Attach a copy of the facility's Contingency Plan. This requirement should describe emergency management personnel and procedures and may be met using a modifying or expounding on an existing SPCC plan or should contain the items listed in the Specific Instructions. (see item 7 on pages 5 and 6).

The contingency plan is labeled as Attachment ⁶_____

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

The unit management description is labeled as Attachment ⁷_____

9. Attach a copy of the facility's Closure plan and schedule. This plan may be generic in nature and will be modified to address site specific closure standards at the time of closure. (See item 9, pages 6 and 7).

The closure plan is labeled as Attachment ⁸_____

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

A description of employee training is labeled as Attachment ⁹_____

APPLICATION FORM FOR A USED OIL PROCESSING PERMIT

PART II - CERTIFICATION

TO BE COMPLETED BY ALL APPLICANTS

Form 62-710.901(a). Operator Certification

Fuels Unlimited Inc. FLR 000050369
Facility Name: _____ EPA ID# _____

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gathered and evaluated the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment or knowing violations. Further, I agree to comply with the provisions of Chapter 403, Florida Statutes, Chapters 62-701 and 62-710, F.A.C., and all rules and regulations of the Department of Environmental Protection

Signature of the Operator or Authorized Representative*

Ronald C. Patterson, Owner

Name and Title (Please type or print)

Date: _____ Telephone: (407) 302-3193

* If authorized representative, attach letter of authorization.

DEP Form#	62-710.901(6)(b)
Form Title	<u>Used Oil Processing Facility</u>
	<u>Permit Application</u>
Effective Date	<u>June 9, 2005</u>

APPLICATION FROM FOR A USED OIL PROCESSING PERMIT

PART II - CERTIFICATION

Form 62-710.901(b). Facility Owner Certification

Facility Name: Fuels Unlimited Inc. EPA ID# FLR 000050369

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

Signature of the Facility Owner or Authorized Representative*

Ronald C. Patterson, Owner

Name and Title (Please type or print)

Date: _____ Telephone: (407) 302-3193

* If authorized representative, attach letter of authorization.

DEP Form#	62-710.901(6)(c)
Form Title	<u>Used Oil Processing Facility</u> <u>Permit Application</u>
Effective Date	<u>June 9, 2005</u>

APPLICATION FROM FOR A USED OIL PROCESSING PERMIT

PART II - CERTIFICATION

Form 62-710.901(c) Land Owner Certification

Facility Name: Fuels Unlimited Inc. EPA ID# FLR 000050369

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

Signature of the Land Owner or Authorized Representative*

Ronald C. Patterson, Owner

Name and Title (Please type or print)

Date: _____ Telephone: (407) 302-3193

* If authorized representative, attach letter of authorization.

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

APPLICATION FORM FOR A USED OIL PROCESSING PERMIT

PART II - CERTIFICATION

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

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

1. Certification of secondary containment adequacy (capacity), structural integrity (structural strength), and underground process piping for storage tanks, process tanks, and container storage.
2. Certification of leak detection.
3. Substantial construction modifications.
4. Those elements of a closure plan requiring the expertise of an engineer.
5. Tank design for new or additional tanks.
6. Recertification of above items.

Please Print or Type

_____ Initial Certification _____ Recertification

1. DEP Facility ID Number: _____ 2. Tank Numbers: _____

3. Facility Name: _____

4. Facility Address: _____

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

Name (please type)

Florida Registration Number: _____

Mailing Address: _____

Street or P. O. Box

City State Zip
Date: _____ Telephone () _____

[PLEASE AFFIX SEAL]

First Notice of Deficiency Response Items, February 24, 2012

Fuels Unlimited Inc, Used Oil Processing Renewal Permit

Permit Number 00266845-HO-002

The following response are provide for each item in the FDEP letter dated February 24, 2012, with the exception of Specific Comment #10, and General Comment #3. Pursuant to your e-mail to Ms. Karen Violet on April 25, 2012, the responses to these items will be submitted by May 26, 2012. Each comment is provided below, followed by a response.

Specific Comments

Comment #1. *Florida DEP Application Form #62-710.901(6), page 8, and part I.A.3, Note: According to the permit application and approved Florida Notification of Regulated Waste Activity Form 8700-12FL, the facility appears to be a marketer. Therefore, the facility must mark on Form #62-710.901(6), Part I.A.3 as a marketer also. Please review the form and revise as appropriate.*

Response: Form #62-710.901(6), Part I.A.3 has been revised to reflect that the facility is also a marketer.

Comment #2. *According to Form 8700-12FL, the facility is registered as a used oil transporter, used oil transfer facility, used oil marketer, used oil filter transporter, used oil filter transfer facility, and used oil filter processor which expires on June 30, 2012. As of today, the Department has not received renewal registration documents from the facility. The registration renewal due date to submit such documents is March 1, 2012. Please submit the documents in a timely manner.*

Response: These documents have been submitted to the Department by Fuels Unlimited Inc.

Comment #3. *Florida DEP Application, Form #62-710.901(6), B.1-Site information and Page 9: The facility latitude and longitude of 28.80760, -81.27285 translate to 28° 47' 27", -81° 16' 22" respectively. Please update the entry.*

Response: Form #62-710.901(6), B.1-Site information and Page 9, has been updated with 28° 47' 27", -81° 16' 22", as requested.

Comment #4. *Tab 1, Attachment 1, Facility Operational Information: The description of the operations planned for the facility needs to be expanded. The facility also picks up oily waste water, which they transport to an offsite treatment facility. They may choose to store in the onsite tank for more than 7 days. They have historically identified the material as non-hazardous oily waste water, not used oil. The tank is not part of a Clean Water Act treatment system. Please expand the paragraph to include where on on-spec used oil is shipped, where the oily waste water is shipped and where the used antifreeze is shipped for recycling. Also, clarify Tank #7, Product Type: Is this Oily Water or Oily Wastewater?*

Response: Attachment 1 has been expanded as requested. Tank #7 is used to store oily water.

Comment #5. *Tab 2, Attachment 2, Section 7-Off Spec Used Oil: Please explain in detail where the off-spec used oil is marketed and transported to a permitted used oil processing facility.*

Response: Attachment 2 has been revised to include the requested information.

Comment #6. *Tab 2, Attachment 2, Section 8 – Items Which are Not Accepted by Fuels Unlimited, Inc.: No Sludge material is accepted or transported by Fuels Unlimited. Please verify this statement since the last inspection on May 10, 2011, the department found a number of sludge drums generated off site that were transported to the facility. The facility was not able to provide analytical results for these drums nor determine from where they come. Please explain and expand this paragraph as appropriate.*

Response: Attachment 2 has been revised to indicate that non-hazardous waste sludge in 55-gallon drums may be picked up from customers and shipped off-site to a proper disposal facility. Fuels Unlimited Inc. will be able to provide analytical results for any 55-gallon drums containing sludge in the future.

Comment #7. *Tab 3, Attachment 3, Analysis Plan, Section 3-Product Analysis Procedures By Fuels Unlimited Inc. Prior to Transport Off-Site: The current analysis plan as written does not meet the requirements of 40 CFR Part 279.55. The plan must identify steps taken to close off the above ground storage tank (AST) to prevent the addition of used oil once the tank has been sampled. The plan must also meet the requirements of 40 CFR Part 279.72*

Response: Attachment 3 has been revised to reflect that the current analysis plan meets the requirements of 40 CFR Part 279.55. The plan has been revised to identify the steps taken to close off the above ground storage tank (AST) to prevent the addition of used oil once the tank has been sampled. The plan also meets the requirements of 40 CFR Part 279.72

Comment #7. *If Fuels Unlimited is claiming used oil meets the on-specification requirements of 40 CFR Part 279.11, the used oil list of parameters that must be tested include that the Flash Point meets the 100 degrees Fahrenheit (F°) minimum, Total Halogens meets the 1,000 ppm maximum, PCB meets the 2 ppm maximum, and Halides meets the 4000 ppm maximum. Please add these constituents to the existing list.*

Response: Attachment 3 has been revised to reflect that the used oil be tested include that the Flash Point meets the 100 degrees Fahrenheit (F°) minimum, Total Halogens meets the 1,000 ppm maximum, PCB meets the 2 ppm maximum, and Halides meets the 4000 ppm maximum.

Comment #7. *Marketing of On-Specification Oil: If any Fuels Unlimited outgoing shipments are to be sold as on-specification oil, the batch of oil shall be analyzed by a laboratory by the DOH Environmental Laboratory Certification Program (ELCP) in the solid and chemical matrix for the analytical and test combinations to be performed. Fuels unlimited shall be in receipt of the laboratory analytical results before selling the selected batch of used oil as "on-specification" oil.*

Response: Attachment 2 and Attachment 3 have been revised to reflect that outgoing shipments to be sold as on-specification oil, the batch of oil shall be analyzed by a laboratory by the DOH ELCP in the solid and chemical matrix for the analytical and test combinations to be performed. Fuels unlimited shall be in receipt of the laboratory analytical results before selling the selected batch of used oil as "on-specification" oil.

Comment #7. Any used oil that is marketed and sold by Fuels Unlimited will not be marketed as "on-specification" without supporting documentation from a National Environmental Laboratory Accreditation Program (NELAP) certified laboratory.

Response: Attachment 2 and Attachment 3 have been revised to reflect that any used oil that is marketed and sold by Fuels Unlimited will not be marketed as "on-specification" without supporting documentation from a NELAP certified laboratory.

Comment #8. Tab 6, Attachment 6, Emergency Preparedness, Prevention & Contingency Plan, Page 9: Please attach the following forms: The Daily Inspection should be documented. The list of emergency response equipment-List should include the quantity/amount of each item; Oil Spill Event Report Form; Florida DEP Discharge Report Form; Monthly Inspection Report Form; Maintenance Log; Storm Water Removal Form; Secondary Containment Structure Integrity Form etc.

Response: Copies the blank forms have been added in Attachment 6 as requested.

Comment #8. Phone Number of Local Authorities and Agencies, Page 21: Please include Seminole County Emergency Management Phone Number and complete comment column.

Response: Attachment 6 has been revised to include the phone number for the Seminole County Emergency Management Department.

Comment #8. All of the attachments in this application are identified in numerical order. However, Attachment 6, is identified using Roman Numerals rather than Arabic. Please review this Attachment and be consistent throughout the permit application.

Response: Attachment 6 has been revised to reference Arabic notation as requested.

Comment #8. The Emergency Coordinators (ECs) identified in the Plan do not include the address and telephone number, both home and office. Emergency Coordinators must live close enough to the facility to respond in a timely fashion to an emergency. Please review and revise as appropriate.

Response: Attachment 6 has been revised to include the address and telephone number, both home and office, for the Emergency Coordinators.

Comment #9. Tab 7, Attachment 7, Unit Management Description; Appendix D-Copy of Inspection Sheet for 2011: Inspection sheet indicates only monthly inspection. Please provided the documentation for daily and annually performed inspections. Also please explain the process used when checking for water in the bottom of tanks.

Response: Attachment 7 has been revised to include the requested information.

Comment #10. Attachment 8-Closure Plan, Section3-Closure Cost Estimate, Page 26, and Figure 1, Site Map: The facility has a total of six (6) tanks with a total capacity of 111,940 gallons of used oil. In addition there are three (3) other tanks with oily waste water, recyclable coolant and one inactive tank respectively. It appears that the submitted closure cost estimates are insufficient to close the facility by a third party with the storage capacity indicated here. Please revise the

estimate and resubmit. If this revision results in the need to adjust and update your financial assurance documents, then those adjustments will also need to be made at this time.

Response: The revised closure cost estimates are not included with this submittal, and will be provided to the Department by May 26, 2012.

Comment #11. *Attachment 9, Training: The employee training program does not include USDOT hazardous materials training. Used oil is commonly contaminated with gasoline, and the mixture may be flammable. Fuels Unlimited used oil screening procedure from the waste analysis plan only includes halogen screening. Chlor-D-Tect kits will not assess the flammability of the materials Fuels Unlimited may be called upon to transport. Please modify the employee training program to include USDOT hazardous materials training.*

Response: Attachment 9 has been revised to include USDOT hazardous materials training.

GENERAL COMMENTS:

Comment #1. *Facility needs to submit a site map in an electronic format (pdf preferred) so that this map can be inserted into the permit.*

Response: Figure 2 has been included as a PDF document separately on the CD with this response.

Comment #2. *Facility needs to submit a used oil tank table in an electronic format (pdf preferred) so that this can be inserted into the permit.*

Response: The used oil tank table been included as a PDF document separately on the CD with this response.

Comment #3: *Tank Inspection: Tanks 1 through 4 were installed in 1920, tanks 5 through 6 were installed in 1981 and tanks 7 through 9 were installed in 1988. The facility must provide the documentation of tank's detailed last inspection and certifications to the Department. Tanks 1 through 4 appear to be more than 90 years old. Please explain in detail when was the latest thickness test performed and the latest tank system integrity assessment performed by a professional engineer registered in the State of Florida. Also, the facility must specify the frequency of sludge removal from the tanks in the application.*

Response: The tank thickness testing and structural integrity assessment information are not included with this submittal, and will be provided to the Department by May 26, 2012.

Comment #4. *According to the latest inspection report, the inspection was conducted by Central District office on May 10, 2011. The facility was storing ten (10) 55-gallon drums of sludge from a spill clean-up. Please identify the drum storage location and filter storage and absorbent material location on a site plan.*

Response: The site plan has been revised to reflect that the metal storage building in the central portion of the facility is used for the storage of any 55-gallon drums, filter storage and absorbent material.

Comment #5. *Any oily wastes or sludge generated at the facility that cannot be managed for energy recovery, a hazardous waste determination will be conducted and the materials will be managed in accordance with 40 CFR Part 279.10(c) and (e).*

Response: Attachment 2 has been revised to reflect that for any oily wastes or sludge generated at the facility that cannot be managed for energy recovery, a hazardous waste determination will be conducted and the materials will be managed in accordance with 40 CFR Part 279.10(c) and (e).

LIST OF ATTACHMENTS

Attachment 1	Description of Facility Operations
Attachment 2	Detailed Process Description
Attachment 3	Analysis Plan
Attachment 4	Management of Solid Waste Materials
Attachment 5	Tracking Plan
Attachment 6	Emergency Preparedness, Prevention & Contingency Plan
Attachment 7	Unit Management Description
Attachment 8	Closure Plan
Attachment 9	Training

FIGURES

Figure 1	USGS Topographic Map
Figure 2	Site Map
Figure 3	2009 Aerial Photograph
Figure 4	Piping Layout
Figure 5	Flood Insurance Rate Map, September 28, 2007

APPENDICES

Appendix A	Site Photographs
Appendix B	Halogen Screening Standard Operating Procedures
Appendix C	Secondary Containment Calculations
Appendix D	Copy of Inspection Sheets for 2011

ATTACHMENT 1

DESCRIPTION OF FACILITY OPERATIONS

Facility Operational Information:

Fuels Unlimited Inc. has owned this facility since January 1, 2006, and is owned by Mr. Ronald C. Patterson and Ms. Karen A. Violet. The previous owner and operator of Oils Unlimited Inc. was Mr. William Patterson. This Used Oil Processing Permit Application has been prepared for Fuels Unlimited Inc. The subject site contains approximately 0.39 acres, and is located at 509 French Avenue (which is also known as U.S. Highway 17-92), in Sanford, Seminole County, Florida. **Figure 1** shows the location of the subject site on the "Sanford" USGS Topographic Map. Fuels Unlimited Inc. is a marketer of used oil, oily water, and recyclable coolant, which is received from various sources. The used oil is sold as an alternative burner fuel product, the oily water is transported to a permitted facility for disposal, and the recyclable coolant is transported to a permitted facility for recycling. The used oil, oily water, and recyclable coolant are either picked up by a tanker/tank truck owned and operated by Fuels Unlimited Inc., or are delivered to the facility by customers. **Attachment 2** contains detailed information where the used oil, the oily water, and recyclable coolant are transported to for use or recycling. Fuels Unlimited Inc. does not conduct any used oil processing on-site except for utilization of a filter in the pump in the loading rack for all oil transfer operations. The Fuels Unlimited Inc. facility consists of a main office building, a spill control shed, an equipment storage shed, a used oil transfer area, and nine aboveground storage tanks (ASTs). **Figure 2** contains a site map which shows the office building, ASTs, and other applicable features. **Figure 3** contains an aerial photograph of the facility. Of the nine ASTs, eight ASTs (#1 through #8) are active, and are used as part of site operations. AST #9 is in-active, and is not used as part of site operations. The nine ASTs are summarized as follows:

Tank Type	Size (gallons)	Date Installed	Product Type	Secondary Containment	Piping Position	Piping	Leak Detection
AST #1	17,740	1920's	Used Oil	Yes - Concrete containment structure	Aboveground	Single wall	Visual
AST #2	17,740	1920's	Used Oil	Yes - Concrete containment structure	Aboveground	Single wall	Visual
AST #3	17,740	1920's	Used Oil	Yes - Concrete containment structure	Aboveground	Single wall	Visual
AST #4	17,740	1920's	Used Oil	Yes - Concrete containment structure	Aboveground	Single wall	Visual
AST #5	20,490	1981	Used Oil	Yes - Concrete containment structure	Aboveground	Single wall	Visual
AST #6	20,490	1981	Used Oil	Yes - Concrete containment structure	Aboveground	Single wall	Visual
AST #7	5,000	1998	Oily water	Yes - Concrete containment structure	Aboveground	Single wall	Visual
AST #8	5,000	1998	Recyclable coolant	Yes - Concrete containment structure	Aboveground	Single wall	Visual
AST #9	2,000	1998	In-active	Yes - Concrete containment structure	N/A	No piping	N/A

The facility is open from 7:00 a.m., to 5:00 p.m., five days per week. As indicated in **Attachment 3**, all used oil which is delivered to the site is tested for total halogens prior to acceptance. Any used oil picked up by Fuels Unlimited Inc. is verified with analytical results or tested for total halogens with a portable kit for halogens by Fuels Unlimited Inc. personnel. The eight active ASTs are located within a concrete containment structure and are connected with piping to a main loading area located to the southwest of the concrete containment structure. AST #9 is in-active, has a capacity of 2,000-gallons, is located within the containment structure, and does not have any piping. Photographs of the subject site are included in **Appendix A**.

In addition, Fuels Unlimited Inc. also accepts 55-gallon drums of non-hazardous sludge, which are picked up and stored in the metal storage building located in the central portion of the subject site. All 55-gallon drums containing sludge are verified as non-hazardous based on review of analytical results before they are accepted by Fuels Unlimited Inc. The 55-gallon drums of non-hazardous sludge are transported for disposal to either Aqua Clean Environmental, in Lakeland, Florida, or to FCC Environmental LLC in Plant City, Florida.

Secondary Containment: Secondary containment is provided for all of the active ASTs and piping, and loading-unloading areas on-site, and is shown on **Figure 2**, and in the photographs included in **Appendix A**. The active ASTs are located within a block containment structure which has a capacity which exceeds 110% of the largest AST. Any water which accumulates within the main containment structure evaporates. The following summary of the containment systems in place for the subject facility is provided:

Tank/Piping	Containment
Eight Active ASTs	Eight ASTs are single wall tanks located within a secondary containment structure.
Aboveground piping	All piping is aboveground, and located above a secondary containment structure.
Loading-Unloading connections	Located within a secondary containment structure.

Employees: Fuels Unlimited Inc. currently has ten employees, consisting of a General Manager, a Plant Manager, office staff and truck drivers.

Loading/Unloading Operations: According to Fuels Unlimited Inc personnel, there can be between 10 to 15 loading/unloading operations per week, and each operation takes from approximately 30 minutes to 1.5 hours. Fuels Unlimited operates tanker/tank trucks for the transport of used oil. The site operations consist of loading and unloading "on-spec" and "off-spec" used oil. Fuels Unlimited currently has two tankers and four tank trucks for the transport of used oil. Approximately two 55-gallon drums containing filters and absorbent debris derived from the used oil transfer process are generated annually containing used oil, etc., and are transported off-site for disposal to a licensed disposal facility. Fuels Unlimited Inc. also accepts oily water and recyclable coolant, which are stored separately from the used oil. The oily water is stored in AST #7, and recyclable coolant is stored in AST #8.

Facility Security: The entire facility is fenced, has adequate lighting and a video surveillance system. The facility lighting is sufficient for discovery of spills occurring during hours of darkness and to minimize vandalism. The facility security is adequate with respect to the location and type of operation associated with the Fuels Unlimited Inc. facility. In addition, the Fuels Unlimited Inc. facility is located 7 blocks to the north of the Sanford Police Station.

Volume Inventory and Control: The volume of used oil is inventoried on a daily basis using manual inventory control as the primary means of inventory control. The manual inventory control is provided by documenting incoming, outgoing, and static volumes on a daily basis for the ASTs. ASTs #1 through #6 are measured prior to receiving any used oil, and after removal of any used oil. AST #7 is measured prior to receiving any oily water, and after removal of any oily water. AST #8 is measured prior to receiving any recyclable coolant, and after removal of recyclable coolant.

Surface Water Features: With respect to surface water features, Fuels Unlimited Inc. is located in an urban area, and review of the USGS "Sanford" Topographic Map included as **Figure 1** indicates that there are no surface water features or wetlands within a ½-mile radius of the subject site. The nearest surface water feature is Lake Monroe, which is located approximately 3,200 feet to the north.

Flood Zone: The location of the subject site was reviewed with respect to the 1995 Flood Insurance Rate Map. The subject site is located within "Zone X", which is a 500-year flood plain designation, or areas of 100-year flood with average depths of less than 1 foot or with drainage areas less than 1 square mile; and areas protected by levees from 100-year flood. A copy of the Flood Zone map which shows the subject site is included in **Figure 5**.

Utilities and Drainage Features: With respect to site utilities and drainage features, the City of Sanford provides water and wastewater services to the subject site. The paved areas on-site consist of concrete pads with raised curbing, as shown in **Figure 2**. The remaining areas not occupied by the secondary containment structures and the concrete pads are either grass or contain gravel. No stormwater catch basins, retention ponds or drainage swales are present on-site. The site contains approximately 0.39 acres, and is relatively flat. The stormwater drainage is in all directions, depending on the specific location within the site. The nearest stormwater catch basins are located off-site, along French Avenue. One catch basin is located approximately 150 feet to the north, and the other is located approximately 150 feet to the south. The subject site does not contain an oil/water separator.

ATTACHMENT 2

DETAILED PROCESS DESCRIPTION

Fuels Unlimited Inc. operates five days per week, 7:00 a.m. to 5:00 p.m., Monday through Friday. The entire site is fenced, and is locked during non-operating hours. No used oil, oily water, or recyclable coolant are transferred during non-operating hours. The following detailed process description information is provided:

1. *Used Oil On-Site Delivery and Pickup:*

Used oil is obtained by Fuels Unlimited Inc. by two methods. The first method is where used oil is picked up by Fuels Unlimited Inc. drivers and transported to the subject site. The second method is where used oil is delivered to the facility by customers.

All tank truck loading/unloading procedures are conducted under the supervision of Fuels Unlimited Inc. personnel. The hose connections for used oil, oily water and recyclable coolant loading and unloading operations at the Fuels Unlimited Inc. facility are conducted within secondary containment. ***Each driver must insure that all hoses and pumps are connected and operated properly, and the driver must remain present at the truck at all times during loading and unloading operations.***

2. *Oil Product Testing and Acceptance Procedures:*

Customers Whose Used Oil is Picked Up by Fuels Unlimited Inc.:

For customers whose used oil is picked up by Fuels Unlimited Inc., total halogen levels are determined either by the customer providing analytical results, or by testing by Fuels Unlimited. For customers that do not have analytical results, Fuels Unlimited Inc. personnel tests the used oil to be picked up for total halogens with a CFC detection device (model #TIFRX-1A) manufactured by TIF, (which is referred to hereafter as a "sniffer"), and/or a portable testing kit (Clor-D-Tect 1000 halogen test kit) manufactured by Dexsil. Both instruments are designed to detect total halogens up to 1,000 parts per million (ppm). If the analytical results or the testing results indicate that the total halogens exceed 1,000 ppm, then it is not picked up by Fuels Unlimited, Inc.

Customers Who Deliver Used Oil to the Fuels Unlimited Inc. Facility:

For the customers who deliver used oil to the facility, a sample is collected from each delivery and tested for total halogens on-site prior to unloading. CFC detection device (model #TIFRX-1A) manufactured by TIF and/or a Clor-D-Tect Chlorine Halogen Dexsil test kit. Additional information regarding the testing procedure is provided in **Attachment 3**. Once the halogen levels are determined to be acceptable by Fuels Unlimited Inc. personnel, the product is suitable for transfer. In addition, some customers do provide analytical results.

3. *Marketing of On-Specification Used Oil:*

Prior to shipment of each batch of used oil, each batch is sampled and analyzed to determine if it is on-specification or off-specification, based on the parameters and criteria identified in **Attachment 3**. Any laboratory utilized will be in the DOH Environmental Certification Program (ELCP) for the solid and chemical matrix for the analytical and test combinations to be performed. Fuels Unlimited Inc. receives all laboratory analytical results before selling the specific batch of used oil as "on-specification".

Once the used oil is determined to be "on-specification", it is transported by Fuels Unlimited Inc. to customers who utilize the "on-specification" used oil as an alternative burner fuel product. Upon arrival at the designated facilities, the Fuels Unlimited Inc. driver unloads the used oil into the customer's storage tank. A Non-Hazardous waste manifest is utilized for each delivery, and is retained by Fuels Unlimited Inc. for three years.

Fuels Unlimited Inc. will not market any "on specification" used oil without supporting documentation from a National Environmental Laboratory Accreditation Program (NELAP) certified laboratory.

4. *Marketing of Off-Specification Used Oil*

If it is determined by analytical testing that "off-specification" used oil is present in ASTs #1 through 6, the "off-specification" used oil is marketed and transported to FCC Environmental LLC in Plant City, Florida.

5. *Used Oil Processing*

Fuels Unlimited Inc. conducts a minimal amount of processing, which consists of the removal of particulates during the transfer process. The particulates are removed from the used oil during the transfer process with a fabric filter located in the loading/unloading area.

6. *Oily Water*

AST #7 is used for the storage of oily water, and is transported off-site as a non-hazardous waste for disposal to either Aqua Clean Environmental in Lakeland Florida, or Liquid Environmental Services Inc. in Jacksonville, Florida.

7. *Recyclable Coolant*

AST #8 is used for the storage of recyclable coolant, and is transported off-site for recycling to MMT Environmental in Lakeland, Florida.

8. *Used Oil Filters*

Used oil filters which are picked up from customers are stored in 55-gallon drums which are stored in the metal storage building, which is shown in **Figure 2**. The 55-gallon drums containing the used oil filters are transported to a licensed facility where they are utilized in the manufacturing of manhole covers. Depending on the month, 0 to 60, 55-gallon drums are transported off-site per month.

9. *55-Gallon Drums Containing Sludge*

Fuels Unlimited Inc. also accepts 55-gallon drums of non-hazardous sludge, which are picked up and stored in the metal storage building, as shown in **Figure 2**. All 55-gallon drums containing sludge are verified as non-hazardous based on review of analytical results provided by the customers before they are accepted by Fuels Unlimited Inc. The 55-gallon drums of non-hazardous sludge are transported to either Aqua Clean Environmental, in Lakeland, Florida, or to FCC Environmental LLC in Plant City, Florida, for proper disposal as non-hazardous waste.

10. *Items Which are Not Accepted by Fuels Unlimited, Inc.:*

No hazardous waste is accepted or transported by Fuels Unlimited Inc.

11. *Hazardous Waste Determination for Oily Water or Sludge*

No hazardous waste is generated on-site, or is accepted by Fuels Unlimited Inc. In the event that any oily water or sludge cannot be managed for energy recovery, Fuels Unlimited Inc. will conduct a hazardous waste determination, and the materials will be managed in accordance with 40 CFR, Part 279.10© and (e), as applicable.

ATTACHMENT 3

ANALYSIS PLAN

1. Product Analyses and Acceptance Procedures

For customers who deliver used oil to the facility, a sample is collected from each delivery and tested on-site for total halogens prior to unloading by means of a CFC detection device (model #TIFRX-1A) manufactured by TIF and/or a Clor-D-Tect Chlorine Halogen Dextsil test kit. **Appendix B** contains a copy of the Standard Operating Procedures utilized by Fuels Unlimited Inc. for the CFC detection device (model #TIFRX-1A) manufactured by TIF and the Clor-D-Tect Chlorine Halogen Dextsil test kit. Each customer is aware that Fuels Unlimited Inc. accepts only used oil which has a reading of less than 1000 ppm for total halogens.

Should an incoming delivery exceed 1000 ppm of total halogens, the delivery load is not accepted, and it is then removed by the customer. If the total halogen level is less than 1000 ppm, the delivery tanker is allowed to unload. All of the total halogen results for the on-site testing are maintained by Fuels Unlimited Inc. personnel for at least three years.

2. Customers Whose Used Oil is Picked Up by Fuels Unlimited Inc.

For customers who do not have analytical results for total halogens, Fuels Unlimited Inc. personnel will test the load for total halogens with a CFC detection device (model #TIFRX-1A) manufactured by TIF, and/or a portable testing kit (Clor-D-Tect 1000 halogen test kit) manufactured by Dextsil. For customers who have analytical results which indicate that the used oil has a total halogen level less than 1000 ppm, the results are provided to the Fuels Unlimited Inc. driver prior to pickup. If the analytical results indicate that the used oil has a total halogen level greater than 1,000 ppm, then it is not picked up by Fuels Unlimited, Inc. All of the total halogen test results provided to Fuels Unlimited Inc. are maintained by Fuels Unlimited Inc. personnel for at least three years.

3. Product Analyses Procedures By Fuels Unlimited Inc. Prior to Transport Off-Site

As indicated in **Attachment 2**, once one or more of ASTs #1 through #6 used to store used oil are full, a sample is taken and sent to an outside licensed laboratory for analysis for the parameters listed below. If any of the parameters exceed the applicable levels listed above, it is determined to be "off-specification", and which is then sent to FCC Environmental in Plant City, Florida, or a similar facility permitted to accept "off-specification" used oil, for proper disposal.

Arsenic	5 ppm (maximum)
Cadmium	2 ppm (maximum)
Chromium	10 ppm (maximum)
Lead	100 ppm (maximum)
Sulfur	0.4% (maximum)
Flash Point	100 degrees, Fahrenheit (minimum)
Total Halogens	1,000 ppm (maximum)
PCBs	2 ppm maximum
Halides	4,000 ppm (maximum)

4. Product Analyses Procedures for Oily Water and Sludge

If oily water or sludge generated at the facility cannot be managed for energy recovery, a hazardous waste determination will be conducted and managed in accordance with 40 CFR, 279.10© and (e).

5. Procedures to Prevent the Addition of Used Oil Once An AST Has been Sampled

When an AST containing used oil is full and has been sampled, it is closed off from the piping network using the applicable valves. The particular AST which has been closed off after sampling will remain closed until the used oil is removed.

6. Laboratory Information

Any laboratory utilized will be in the DOH Environmental Certification Program (ELCP) for the solid and chemical matrix for the analytical and test combinations to be performed. Fuels Unlimited Inc. receives all laboratory analytical results before selling the specific batch of used oil as "on-specification".

Fuels Unlimited Inc. will not market any "on specification" used oil without supporting documentation from a National Environmental Laboratory Accreditation Program (NELAP) certified laboratory.

ATTACHMENT 4

MANAGEMENT OF SOLID WASTE MATERIALS

Due to the type of operation conducted by Fuels Unlimited Inc., only a minimal amount of petroleum contaminated solids and/or water containing used oil are generated on-site on an annual basis. The following summary information is provided:

1. Water in Used Oil:

No water is accepted from any customers who deliver used oil to Fuels Unlimited Inc. In the event that water is present in a delivery to Fuels Unlimited Inc., it is pumped into AST #7 and then is taken to a licensed water treatment facility for disposal.

2. Excess Used Oil in Hoses:

After transfer operations are completed, the remaining small amount of excess oil in the hose is contained in a plastic bucket which is located under the hose/valve connection to catch any drips during the disconnect or connection of the hose. The used oil is then put into a 55-gallon drum. Once the 55-gallon drum is full, it is pumped out by Fuels Unlimited Inc. approximately twice per year, and is pumped into a tank used to store used oil.

3. Absorbent Materials:

Approximately two 55-gallon drums of absorbent materials containing used oil and filter debris are generated annually. These drums are stored on-site in the metal storage building shown in **Figure 2**, and are transported off-site for disposal as a non-hazardous waste to a state certified disposal facility.

4. Water Which Accumulates in Loading Secondary Containment Area:

According to site personnel, the majority of water which accumulates in the loading secondary containment area evaporates. During the wet season, any excess water which does not evaporate is pumped out, and put in AST #7. The oily water is then disposed at a state certified treatment facility. According to site personnel, this is approximately 0 to 500 gallons per year. As a result, no stormwater is discharged off-site from the secondary containment area at any time.

ATTACHMENT 5

TRACKING PLAN

All incoming and outgoing deliveries are tracked by Fuels Unlimited Inc. personnel using Non-Hazardous Waste Manifests. The following summary information is provided:

1. Product Receipt by Fuels Unlimited Inc.

- a) Upon delivery of used oil by a customer to the Fuels Unlimited Inc. facility, a Receipt Manifest is filled out for each used oil delivery received by facility. The customer who provides the delivery is identified as the generator.
- b) When used oil is picked up by Fuels Unlimited Inc. a Receipt Manifest is filled out for each customer. A copy is left with the customer, and a copy is maintained in the Fuels Unlimited Inc. office. The customer is identified as the generator, and Fuels Unlimited Inc. is identified as the transporter and designated facility.

2. Product Delivery by Fuels Unlimited Inc.

When Fuels Unlimited Inc. transports used oil to a customer for use as an alternative burner fuel product, a Delivery Manifest is filled out for each delivery. For this scenario, Fuels Unlimited Inc. is identified as the generator.

Each manifest is retained on-site by Fuels Unlimited Inc. personnel for at least 3 years. Each manifest contains the applicable facility name, facility identification number, address, drivers name, volume and destination.

ATTACHMENT 6

EMERGENCY PREPAREDNESS, PREVENTION & CONTINGENCY PLAN

Table of Contents

1. Introduction
2. Site Information
3. Spill Prevention, Potential Spill Scenarios and Emergency Preparedness
4. Contingency Plan Implementation and Reporting Criteria
5. Incident Notification and Immediate Response Actions
6. Documentation and Record Keeping

Figure CP- 1- Site Map for Contingency Plan

Figure CP- 2- Piping Layout

Forms

1. Introduction

Purpose

The goal of this emergency preparedness and contingency plan is to minimize hazards to human health and the environment from fires, explosions, or any unplanned sudden or non-sudden releases to soil on-site and in the immediate vicinity of the subject site. No surface water features are present within a ½-mile radius of the subject site. The provisions of this plan will be carried out whenever there is a fire, explosion, or release of used oil, which could threaten human health or the environment. A copy of this plan and any revisions will be maintained at the facility and submitted to local police, fire department and hospital, that might be called upon to provide emergency services.

Areas of Concern:

- Spills Associated With Loading and Unloading of Used Oil
- Spills Associated With Transportation of Used Oil
- Release of Used Oil in ASTs Stored On-site
- Fires, and Incidents Which Result in Injuries to Site Personnel

Responsibilities

The Primary Incident Coordinator (PIC) must be familiar with this contingency plan, operations and activities at the facility, including the location and characteristics of used oil, the location of records, and the facility layout. The PIC or his/her designee is responsible for modifying this plan, as needed, to reflect changes in facility operations and/or county, state, or federal regulations. The PIC is responsible for ensuring that Fuels Unlimited Inc. employees are familiar with the content of this plan and are able to implement it, if needed and responsible for ensuring that this plan is posted and accessible to Fuels Unlimited Inc. employees. The PIC is responsible for implementing the plan in the event of an emergency and/or accidental release of used oil. In the absence of the PIC, the Secondary Incident Coordinator (SIC) will be responsible for implementation. The SIC must also be familiar with this Plan, to the same extent as the PIC. The PIC or his/her designee is responsible for modifying this plan, as needed. For this contingency plan, the PIC is Mr. Ronald Patterson, and the SIC is Ms. Karen Violet.

After any emergency or spill event where this contingency plan is implemented, this contingency plan shall be reviewed and revised as necessary in the event of the plan's failure, the lack of pertinent information within the plan or any other identified problem associated with the plan. The responsibilities of the PIC and/or SIC are as follows:

Response: Respond to any emergencies that may arise. Use established response protocols in response to the specific incident, and summon aid as necessary. Evacuate the facility if required. Implement the spill response procedures for a used oil spill as summarized in Section 4. below.

Notification: Provide the required notification of the applicable Federal, State and Local agencies as summarized in Section 5. below.

Authorization to Commit Necessary Resources

The PIC and/or SIC are authorized to commit the necessary resources during an emergency, and at least one coordinator is always on-site or on call and can reach the facility on short notice during an emergency. In addition, after an emergency, the PIC and/or SIC and alternate SIC will provide for the proper management of recovered waste, contaminated soil or other debris, and any contaminated surface or groundwater.

Figure CP-1 contains specific items applicable to this Emergency Preparedness, Prevention and Contingency Plan. **Figure CP-2** shows the aboveground piping for the ASTs.

2. Site Information

Facility Name:	Fuels Unlimited Inc., D.B.A. Oils Unlimited
Location:	509 South French Avenue, Sanford, Seminole County, Florida
Telephone No.:	(407) 302-3193
Cell Number for PIC:	(407) 908-4140, Ronald C. Patterson
Cell Number for SIC:	(407) 908-4493, Karen Violet
Address for PIC/SIC	30646 Vitex Avenue, Eustis, FL (located approximately 25 minutes from Fuels Unlimited Inc. facility)

Facility Activities and Personnel:

Fuels Unlimited Inc. is a marketer of used oil. Used oil is either picked up by tanker/tank truck owned and operated by Fuels Unlimited Inc. Or used oil is brought to the facility by licensed used oil transporters. Fuels Unlimited Inc. transports the used oil to asphalt plants who utilize the used oil for fuel and to other licensed facilities. Fuels Unlimited Inc. currently has 10 employees, consisting of a General Manager, Plant Manager, office staff, and drivers. .

Fuels Unlimited Inc. does not conduct any processing of used oil on-site, and is open from 7:00 a.m. to 5:00 p.m., five days per week. All used oil which is delivered to the site is tested for applicable criteria prior to acceptance. Any used oil picked up by Fuels Unlimited Inc. is verified with analytical results or tested with a portable kit for halogens by Fuels Unlimited Inc. personnel.

ASTs: Eight active and one in-active ASTs are located within a large secondary containment structure. The used oil is stored in the six active ASTs on-site. AST #7 is used to store oily water and AST #8 is used to store recyclable coolant. The eight ASTs are connected with piping to a main loading area located to the southwest of the concrete containment structure.

Secondary Containment: Secondary containment is provided for all of the active ASTs as shown on **Figure CP-1**. **Figure CP-2** shows the piping layout, and all piping is above the secondary containment structure.

Site Utility and Drainage Information: The subject site utilizes water and wastewater services provided by the City of Sanford. No stormwater catch basins or retention ponds are on-site. No

stormwater drainage ditches are present on-site. The nearest stormwater catch basins are located off-site, approximately 150 feet to the north, and south, along U.S. Highway 17-92. All stormwater which accumulates within the secondary containment area either evaporates, or is pumped into AST #7. As a result, no stormwater is discharged off-site from the secondary containment area

Surface Water Features: With respect to surface water features, Fuels Unlimited Inc. is located in an urban area, and review of the USGS "Sanford" Topographic Map indicates that no surface water features or wetlands are located within a 1/2-mile radius of the subject site. The nearest surface water feature is Lake Monroe, which is located approximately 3,200 feet to the north.

Adjacent Off-Site Properties: The adjacent off-site properties are as follows:

- North:* A small retail building which contains two tenants is present immediately to the north. The tenants include Fun 2 Dive Scuba, and Guns & Ammo Store. Kerns Transmissions is located immediately to the northeast.
- South:* Railroad tracks are located immediately to the south. An automobile sales facility identified as Dixon Wheels is located to the south of the railroad tracks at 601 South French Avenue.
- East:* A building utilized by Kerns Transmission is located immediately to the east.
- West:* South French Avenue, also known as U.S. Highway 17-92, is located immediately to the west. Jahan Audio & Security is located further to the west at 512 South French Avenue.

Potential Chemical Exposure Information

The types of material on-site that employees may be exposed to is used oil, recyclable coolant, oily water, and used oil filters. No other chemicals are stored or utilized on-site.

3. Spill Prevention, Potential Spill Scenarios and Emergency Preparedness

Spill Prevention Measures: Prevention of spills is accomplished through the use of secondary containment structures, careful handling of the used oil, frequent inspection of transport systems, the ASTs, aboveground piping, and strict observation of safety during product transfers. The operations are reviewed in terms of existing procedures and spill potential. The following items apply to the Fuels Unlimited Inc. facility:

General Spill Prevention Measures

- Drivers are responsible for the guarding against overfilling tanks.
- Tanks are considered full at 90% of total volume.
- Pumps must be attended while in operation.
- Pumps, pipes, hoses, gaskets, and connections are inspected for wear by the responsible employee.

- Any residual amount of used oil in the transfer hose is placed into a 5-gallon bucket, which is emptied into a 55-gallon drum.
- All ASTs and piping are located within secondary containment, and the pump and hose connection for all loading/un-loading operations is located within a secondary containment structure.

Prevention and Protective Measures

- Inspections are conducted daily, monthly, and annually by Fuels Unlimited Inc personnel.
- Proper and safe work behavior practices are emphasized.
- Provision and use of proper equipment and facilities are emphasized.
- Continual assessment of potential hazards are conducted and emphasized.
- Effective training is utilized for employees.
- Communication between all applicable parties is emphasized.

Potential Spill Scenarios: The following potential spill scenarios for the subject site are summarized as follows:

Potential Event	Volume (gallons)	Spill Rate	Potential Flow Direction
Complete failure of one of the largest ASTs	1 to 20,490	A	Release will be contained within containment structure.
Partial failure of one of the largest ASTs	1 to 20,490	A to B	Release will be contained within containment structure.
Product transfer pipe failure	1 to several gallons	C	Release will be contained within containment structure.
Leaking product transfer piping	1 to several gallons	D	Leakage will be contained within containment structure.
Tank overfill-reverse of pumps	1 to several gallons	C to D	Release will flow to south, east, and west, on gravel surface. A containment wall on the western boundary prevents any off-site migration to South French Avenue.
Hose leak during truck loading	1 to several gallons	D	Leakage will be contained within containment structure.
Failure of Two 55-Gallon Drums	1 to 110	A to B	Leakage will be contained in containment structure.
Spill Rate: A = Instantaneous; B = Gradual to instantaneous; C = 4 gallons per second; D = Up to 1 gallon per minute.			

Emergency Preparedness

Fire Control Systems:

Three dry chemical fire extinguishers are present on-site. One is in the office building, one is located in the storage area in the eastern portion of the office building, and one is located on the active loading area, as shown on **Figure CP-1, Attachment 6, Contingency Plan Site Map**. The fire extinguishers are maintained under an annual contract with Tri-County Fire Equipment. With respect to fire hydrants, on September 2, 1995, the City of Sanford Fire Department issued a Pre-Fire Plan for the subject site, and indicated that the primary hydrant is located approximately 480 feet to the northeast of the subject site. The secondary hydrant is located approximately 454 feet to the south.

Emergency Communication:

There are five telephones in the main office building. All operating personnel have cellular phones. Visual and voice warnings will be used to notify on-site personnel of an on-site emergency during working hours, and telephones will be used to contact either the PIC, SIC, and the applicable emergency response agency. Telephone communications will be used to contact the PIC and SIC regarding emergencies during non-working hours.

Available Cleanup Equipment

The following equipment, and the quantities of each item specified below, is maintained by Fuels Unlimited Inc. in the metal storage building, which is shown in **Figures CP-1 and CP-2** for spill response:

- 4 absorbent booms
- 25 absorbent pads
- 4 plastic bags
- 4 pairs of plastic or vinyl gloves
- 2 55-gallon recovery drums
- 4 shovels

Additional spill cleanup equipment can be purchased from the following vendor:

- Breg International (800) 433-1013

The Fuels Unlimited Inc. PIC and/or SIC is responsible for purchasing and maintaining spill control equipment and supplies.

4. Contingency Plan Implementation and Reporting Criteria

This section contains contingency and response procedures for the Fuels Unlimited Inc. facility at 509 S. French Avenue, Sanford, Seminole County, Florida. This section also contains the criteria which requires implementation of the contingency plan. The criteria for implementation of the

contingency plan is based upon applicable U.S. Environmental Protection Agency (EPA) and FDEP criteria.

Fire, Explosion and Injuries

In case of a fire, an explosion, or significant injuries to site personnel, the Fire Department will be contacted immediately by dialing 911. If there are injuries, EMS can also be contacted by dialing 911.

Spill Reporting Limits

With respect to reporting limits for oil spills pursuant to U.S. EPA criteria, it is important to determine if a spill will affect "waters of the U.S.", or is classified as an "inland spill". With respect to a discharge of oil products, the U.S. EPA defines in the Federal Water Pollution Control Act as any spilling, leaking, pumping, pouring, emitting, emptying, or dumping that enters the waters of the U.S. or the adjoining shorelines in harmful quantities.

U.S. EPA Criteria - Waters of the U.S.

The U.S. EPA, considers a "harmful quantity of oil" (25 gallons or more) to be a discharge that results in a violation of applicable water quality standards; causes a film or sheen upon the water or adjoining shorelines; discolors the water or adjoining shorelines or causes an emulsion or sludge to be deposited beneath the surface of the water or upon adjoining shorelines. Navigable "waters of the U.S." include interstate waters, interstate wetlands, intrastate lakes, rivers and streams that are utilized by interstate travelers for recreational or other purposes and intrastate lakes, rivers, and streams from which fish or shellfish are taken and sold commercially.

The subject site is located within an urban area, and no navigable waters of the U.S. are located within a 1/2-mile radius. The nearest navigable water of the U.S. to the subject site is Lake Monroe, which is located approximately 3,200 feet to the north of the subject site.

U.S. EPA Criteria - Inland Oil Spills

According to the U.S. EPA, inland oil spills are classified into three categories, as follows:

- Major - greater than 10,000 gallons
- Medium - greater than 1,000 gallons and less than 10,000 gallons
- Minor - less than 1,000 gallons

With respect to implementation of this Contingency Plan, any spills or incidents that may occur at the Fuels Unlimited Inc. facility will be for ***inland oil spills only***.

Contingency Plan Implementation

Used Oil Spills

With respect to implementation of this Contingency Plan, any spills that may occur at the Fuels Unlimited Inc. facility will be ***inland oil spills***. For inland oil spills, the spill limit is ***25 gallons of oil and/or fuel for implementation of this contingency plan***. The following scenarios apply:

If the spill is less than 25 gallons on an impervious surface (such as concrete), without any part of the spill entering drainage structures, ditches, culverts, sanitary sewer pipes, immediate cleanup is required as specified in Section V, and local agency notification is not required.

If the spill is greater than 25 gallons, or if the spill enters drainage structures, ditches, culverts, sanitary sewer pipes, immediate cleanup is required, and the notification procedures identified in Section V. must be implemented.

5. Incident Notification and Immediate Response Actions

In the event any unplanned, sudden or non-sudden release of oil to the environment, the provisions of this plan must be carried out by the PIC or SIC. The PIC or SIC will determine if the emergency required assistance from Federal, State or Local agencies. If agency assistance is needed, the PIC or Designee shall notify the agency with the following information:

1. Time and type of emergency
2. Location
3. Name and quantity of material(s) involvement
4. Type of service needed
5. The possible hazards to human health or the environment

The following items will be completed by the PIC or SIC:

1. Provide a site layout, description of oil properties and associated hazards (MSDS), and appropriate emergency and evacuation plans.
2. Consult with emergency response teams to determine if agreements between the primary and supporting personnel are necessary
3. Document all agreements/refusals

Incident Notification Numbers

In the event of a fire; emergency resulting in injury to site personnel; a spill greater than 25 gallons; or if a spill less than 25 gallons enters a storm sewer or moves off-site; the Fuels Unlimited Inc. PIC or SIC of the facility will notify the following, depending on the specific incident or situation:

- State of Florida Warning Point (24-hour number) (800) 320-0519
(850) 413-9911
- Sanford Fire Department 911
- Florida Department of Environmental Protection (407) 897-4100
- Seminole County Emergency Management (407) 665-5100
- PetroTech Southeast, Emergency Contractor (407) 656-8114
- Andreyev Engineering, Inc. (407) 330-7763

PetroTech Southeast provides emergency response services, and maintains the necessary equipment and materials for spill response activities. Andreyev Engineering Inc. is an environmental engineering consulting company that can provide technical assistance to Fuels Unlimited Inc. as needed.

Fire, Explosion and Injuries:

In case of a fire, explosion, or significant injury, the Sanford Fire Department will be contacted immediately by dialing 911. If there are injuries, EMS can also be contacted by dialing 911.

The nearest hospital is the Central Florida Regional Hospital is located at 1401 West Seminole Boulevard, in Sanford, and approximately 1 mile from the subject site.

Central Florida Regional Hospital: (407) 321-4500

Evacuation Routes

With respect to evacuation of the subject site in the event of an emergency, the subject site has only one entrance. This entrance is located on the southwest portion of the subject site, as shown on **Figure CP-1**. The subject site contains approximately .39 acres, and the evacuation routes include exiting the facility as shown in **Figure CP-1**.

Spills Less Than 25-Gallons:

In the event of a oil spill resulting in a discharge *less than 25 gallons*, (and does not enter drainage structures or move off-site), the following immediate response actions should be taken in the following order by Fuels Unlimited Inc. personnel at the scene:

- Stop or shut off leak, if possible.
- Immediately notify the PIC or SIC.
- Restrict traffic from entering the spill area.
- Use absorbent booms to prevent spill from moving off-site.
- Control access to the spill site.
- Ensure that no ignition sources are present or allowed into the spill site.
- Initiate cleanup and removal actions as needed and/or possible.

Spills Greater Than 25-Gallons:

In the event of an oil spill resulting in a discharge of 25 gallons or more (or if the spill enters stormwater drainage, ditches, culverts, sanitary sewer pipes, or moves off-site), the following immediate response actions should be taken in the following order by Fuels Unlimited Inc. at the scene:

- Stop or shut off leak, if possible.
- Contact local fire department, and State Warning Point.
- Immediately notify the PIC or SIC.
- Control access to the spill site.
- Restrict traffic from entering the spill area.
- Use absorbent booms to prevent spill from moving off-site.
- Control access to the spill site.
- Ensure that no ignition sources are present or allowed into the spill site.
- Contact designated spill response contractor.
- Do not risk human life or health in an attempt to control a spill.

Disposal Procedures for Recovered Used Oil:

In the event of a spill or release of used oil, Fuels Unlimited Inc. and/or its designated spill contractor(s) will insure the proper and adequate disposal of all recovered used oil materials in accordance with all applicable Federal, State and local requirements. This includes proper disposal of water containing used oil, used oil contaminated with water, and soil which contains used oil.

Cleanup Contractors:

The local fire department will provide emergency response assistance. In addition, PetroTech Southeast has been selected to provide emergency spill response services, as identified in other sections of this contingency plan.

Equipment Decontamination:

All equipment in the emergency response action will be decontaminated with an appropriate compatible cleaning solution before the articles leave the work area. Equipment contaminated with used oil should be cleaned using a surfactant and water solution designed to removed used oil. The PIC is responsible to assure the effected items are clean and the above-mentioned decontamination procedures are performed. Damaged tanks, pipes, drums, etc. will be repaired or replaced with the equivalent equipment that meet or exceed the original design specifications, when applicable.

Off-Site Emergency Response Procedures During transport:

In the event a tanker utilized by Fuels Unlimited Inc. is in an accident, or a spill occurs at a facility where used oil is being picked up from, the following items apply:

1. The Fuels Unlimited driver will assess the situation, and will contact the PIC using the telephone numbers provided in this plan.
2. If the emergency warrants an immediate response by outside agencies, the driver will contact the appropriate agency using the telephone numbers provided in this plan.
3. The driver will set up absorbent material in front of any sewer drains and/or grassy areas to prevent oil from spreading to those areas.
4. The driver will document the incident as noted in this plan, and provide the information to the PIC or SIC. The PIC will submit the information concerning the incident to the applicable agencies.

6. Documentation and Record Keeping

Spill Event and/or Incident Documentation & Reporting

Documentation of the spill incident, or fire or explosion is the responsibility of the Fuels Unlimited Inc. PIC or SIC, and will include:

- Chronological log of events and communication during the incident.
- Description of response actions and their effectiveness.
- Photographs of the incident.

State and Local Agency Reporting

The Fuels Unlimited Inc. PIC or SIC will provide documentation for the spill incident to the appropriate regulatory agencies. This information will include the following, as applicable:

- Name, address, location, and telephone number of the facility.
- Name, address, location, and telephone number of the owner/operator.
- Name, title, and telephone number of the person reporting the spill or incident.
- Date, time, and type if incident.
- The extent of injuries, if any.
- Spill location within the facility and volume/quantity of spill.
- Type of material spilled.
- Corrective actions taken.
- Media affected (soil, groundwater, surface water, sediment, etc.).

The written record of all pertinent information given to the local, state, and/or federal agencies, and the agencies' response are to be retained by the PIC or SIC.

Arrangements with Local Authorities

Arrangements with authorities are established by providing appropriate agencies with a copy of the plan and a letter requesting their assistance in the event of an emergency. In the event revisions to this plan are made, a revised copy will be submitted to the referenced agencies. A copy of this plan has been provided to the following:

Sanford Fire Department

- Provides fire fighting and spill response capability for any fire, release and explosion.
- Provides rescue and emergency medical assistance for employees, if necessary.

Sanford Police Department

- Provides traffic and crowd control outside the facility, and assure free access for fire equipment, ambulances, and emergency response vehicles.
- Assist in the evacuation of the surrounding areas if the emergency situation warrants.

Central Florida Regional Hospital

- Provides medical services and treatment for individuals suffering injuries or illness as a result of an emergency incident on-site.

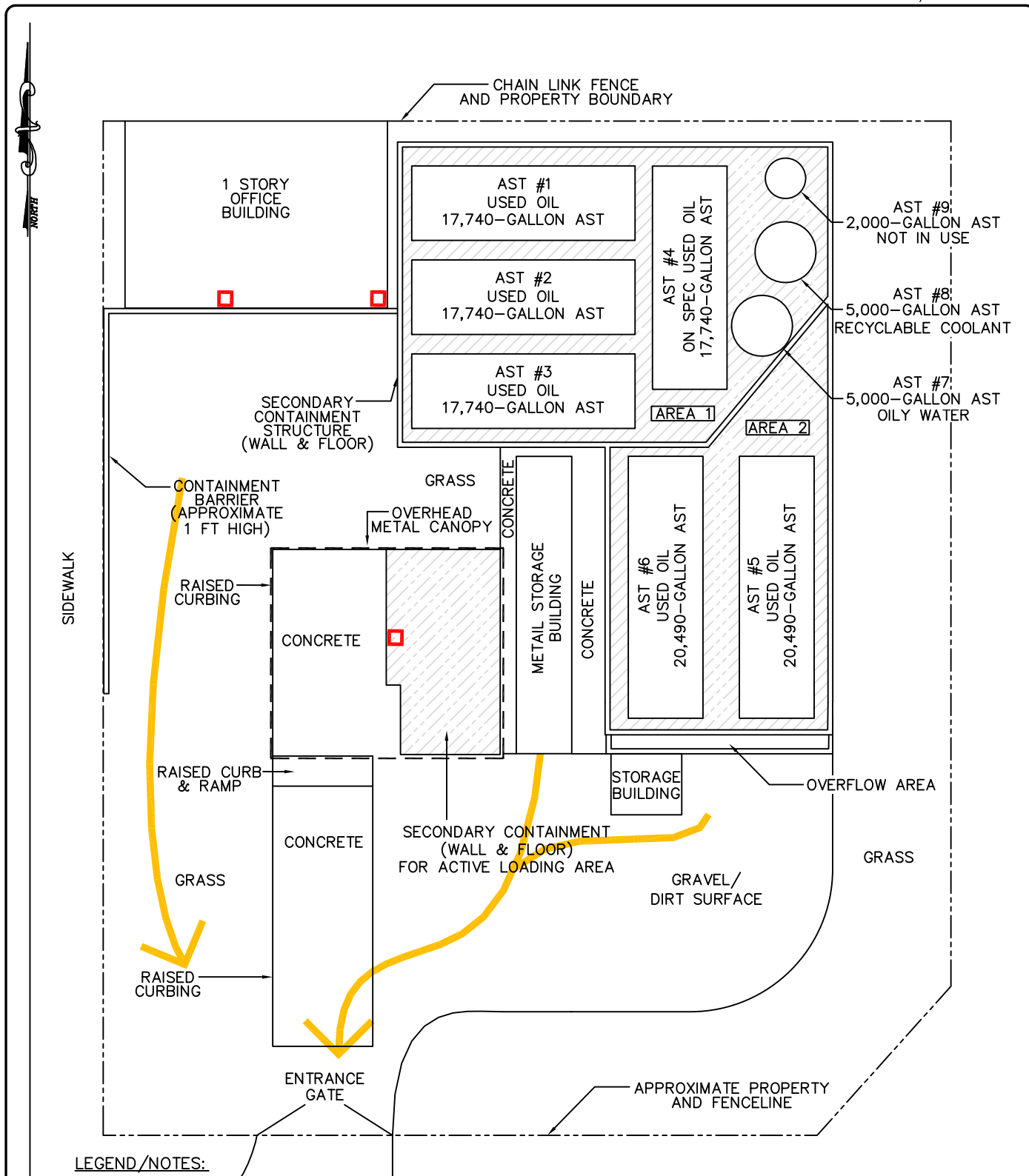
Amendments to Contingency Plan

This plan will be revised in accordance with the following criteria:

- Applicable regulations or ordinances are revised.
- The facility makes significant changes in operations.
- The plan fails in an emergency.
- The facility changes in a manner that materially increases the potential for fires, explosions or the release of hazardous materials/waste, or change the response necessary in an emergency.
- The PIC or SIC changes, or the list of emergency equipment changes.

PHONE NUMBERS OF LOCAL AUTHORITIES AND AGENCIES		
<i>Agency - Entity</i>	<i>Phone Number</i>	<i>Comment</i>
Sanford Fire Department	911	Primary Contact Number for Spill, Fire, Explosion or Emergency
Sanford Police Department	911	Primary Contact Number for Spill, Fire, Explosion or Emergency
State of Florida - Warning Point	(800) 320-0519 (850) 413-9911	Primary Contact Numbers for Spill, Fire, or Emergency - 24 Hour Numbers
FDEP Central District Office, Orlando	(407) 897-4100	Business Hours Number - Non-Emergency Number
Seminole County Emergency Management	(407) 665-5100	Business Hours Number - Non-Emergency Number
EPA Region 4, Atlanta, GA	(404) 562-8700	24 hour Number
Central Florida Regional Hospital, Sanford	(407) 321-4500	Nearest hospital to facility.
National Response Center	(800) 424-8802	Alternate Contact Number for Spills and Emergencies
Florida Poison Information Center	(800) 222-1222	24 hour number for assistance for poison incidents
ChemTrec	(800) 424-9300	24 Hour Number for Assistance regarding chemical exposure
PetroTech Southeast	(407) 656-8114	Emergency Response Contractor
Andreyev Engineering Inc.	(407) 330-7763	Environmental Consultant - Business Hours Number

FIGURES



LEGEND/NOTES:

■ FIRE EXTINGUISHER LOCATIONS

▨ SECONDARY CONTAINMENT AREAS

— EMERGENCY EVACUATION ROUTE

- NOTES: 1) EMERGENCY RESPONSE ITEMS ARE CONTAINED IN THE SPILL CONTROL BUILDING
- 2) THE METAL STORAGE BUILDING IS USED FOR THE STORAGE OF 55-GALLON DRUMS CONTAINING NON-HAZARDOUS SLUDGE AWAITING FOR TRANSPORT FOR PROPER OFF-SITE DISPOSAL & SPILL CONTROL EQUIPMENT.



**Andreyev
Engineering,
Inc.**

APPROXIMATE SCALE:

1"=20'

DATE: 04/30/12

ENGINEER: JJ

PN:EPEN-11-0233

DRAWN BY: DLS

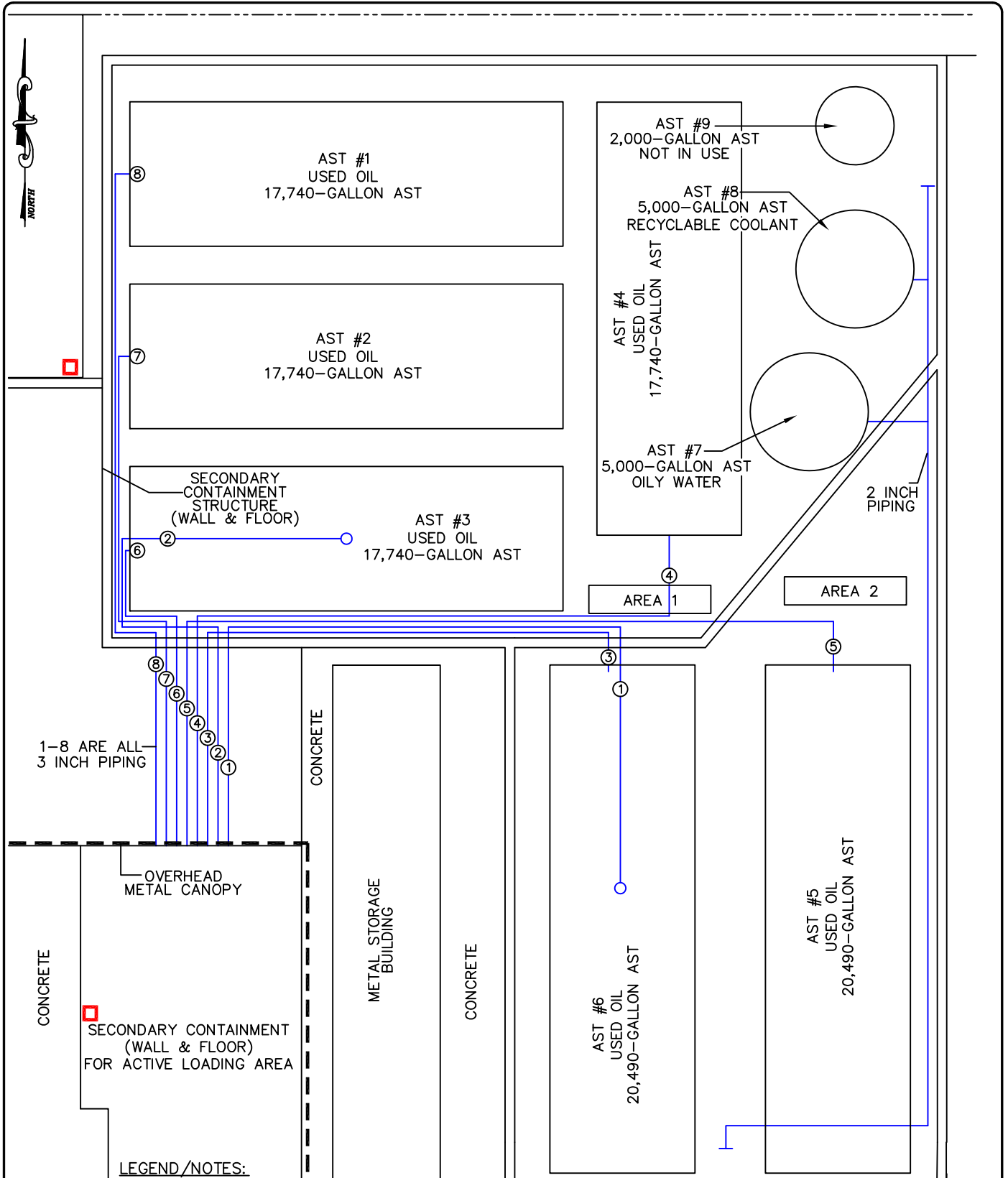
USED OIL PROCESSING PERMIT APPLICATION

**FUELS UNLIMITED INC.
(D.B.A. OILS UNLIMITED)**

509 SOUTH FRENCH AVENUE
SANFORD, SEMINOLE COUNTY, FLORIDA

**ATTACHMENT 6
CONTINGENCY PLAN**

FIGURE CP-1



□ FIRE EXTINGUISHER LOCATIONS

- NOTES: 1) EMERGENCY RESPONSE ITEMS ARE CONTAINED IN THE SPILL CONTROL BUILDING
- 2) THE METAL STORAGE BUILDING IS USED FOR THE STORAGE OF 55-GALLON DRUMS CONTAINING NON-HAZARDOUS SLUDGE AWAITING FOR TRANSPORT FOR PROPER OFF-SITE DISPOSAL & SPILL CONTROL EQUIPMENT.



**Andreyev
Engineering,
Inc.**

APPROXIMATE SCALE:
1"=10'

DATE: 04/30/12
PN: EPEN-11-0233

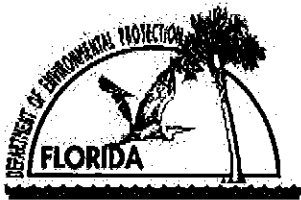
ENGINEER: JJ
DRAWN BY: DAS

USED OIL PROCESSING PERMIT APPLICATION
**FUELS UNLIMITED INC.
(D.B.A. OILS UNLIMITED)**
509 SOUTH FRENCH AVENUE
SANFORD, SEMINOLE COUNTY, FLORIDA

**ATTACHMENT 6
CONTINGENCY PLAN**

FIGURE CP-2

FORMS



DEP Form # 62-761,900(6)
Form Title Incident Notification Form
Effective Date: July 13, 1998

Incident Notification Form

PLEASE PRINT OR TYPE

Instructions are on the reverse side. Please complete all applicable blanks

1. Facility ID Number (if registered): _____ 2. Date of form completion: _____

3. General information

Facility name: _____
Facility Owner or Operator: _____
Contact Person: _____ Telephone number: () _____ County: _____
Facility mailing address: _____
Location of incident (facility street address): _____
Latitude and Longitude of incident (If known.) _____

4. Date of Discovery of incident: _____ month/day/year

5. Monitoring method that indicates a possible release or an incident: (check all that apply)

- | | | |
|--|---|---|
| <input type="checkbox"/> Liquid detector (automatic or manual) | <input type="checkbox"/> Groundwater samples | <input type="checkbox"/> Closure |
| <input type="checkbox"/> Vapor detector (automatic or manual) | <input type="checkbox"/> Monitoring wells | <input type="checkbox"/> Inventory control |
| <input type="checkbox"/> Tightness test | <input type="checkbox"/> Internal inspection | <input type="checkbox"/> Statistical Inventory Reconciliation |
| <input type="checkbox"/> Pressure test | <input type="checkbox"/> Odors in the vicinity | <input type="checkbox"/> Groundwater analytical samples |
| <input type="checkbox"/> Breach of integrity test | <input type="checkbox"/> Automatic tank gauging | <input type="checkbox"/> Soil analytical tests or samples |
| <input type="checkbox"/> Visual observation | <input type="checkbox"/> Manual tank gauging | <input type="checkbox"/> Other _____ |

6. Type of regulated substance stored in the storage system: (check one)

- | | | |
|--|---|---------------------------------------|
| <input type="checkbox"/> Diesel | <input type="checkbox"/> Used/waste oil | <input type="checkbox"/> New/lube oil |
| <input type="checkbox"/> Gasoline | <input type="checkbox"/> Aviation gas | <input type="checkbox"/> Kerosene |
| <input type="checkbox"/> Heating oil | <input type="checkbox"/> Jet fuel | <input type="checkbox"/> Other _____ |
| <input type="checkbox"/> Hazardous substance - includes CERCLA substances, pesticides, ammonia, chlorine, and their derivatives, and mineral acids.
(write in name or Chemical Abstract Service (CAS) number) _____ | | |

7. Incident involves or originated from a: (check all that apply)

- | | | | | |
|---|---|--|--------------------------------|---|
| <input type="checkbox"/> Tank | <input type="checkbox"/> Unusual operating conditions | <input type="checkbox"/> Dispensing equipment | <input type="checkbox"/> Pipe | <input type="checkbox"/> Overfill protection device |
| <input type="checkbox"/> Piping sump | <input type="checkbox"/> Release detection equipment | <input type="checkbox"/> Secondary containment system | <input type="checkbox"/> Other | <input type="checkbox"/> Dispenser Liners |
| <input type="checkbox"/> Loss of >100 gallons to an impervious surface other than secondary containment | | <input type="checkbox"/> Loss of >500 gallons within secondary containment | | |

8. Cause of the incident, if known: (check all that apply)

- | | | | |
|---|--|---|--------------------------------------|
| <input type="checkbox"/> Overfill (<25 gallons) | <input type="checkbox"/> Spill (<25 gallons) | <input type="checkbox"/> Theft | <input type="checkbox"/> Corrosion |
| <input type="checkbox"/> Faulty Probe or sensor | <input type="checkbox"/> Human error | <input type="checkbox"/> Installation failure | <input type="checkbox"/> Other _____ |

9. Actions taken in response to the incident: _____

10. Comments: _____

11. Agencies notified (as applicable):

- | | | |
|---|--|--|
| <input type="checkbox"/> Fire Department. | <input type="checkbox"/> Local Program | <input type="checkbox"/> DEP (district/person) |
|---|--|--|

12. To the best of my knowledge and belief, all information submitted on this form is true, accurate, and complete.

Printed Name of Owner, Operator or Authorized Representative

Signature of Owner, Operator or Authorized Representative.



Discharge Reporting Form

PLEASE PRINT OR TYPE

DEP Form# 62-761.900(1)

Form Title Discharge Reporting Form

Effective Date _____

Instructions are on the reverse side. Please complete all applicable blanks

1. Facility ID Number (if registered): _____ 2. Date of form completion: _____

3. General information

Facility name: _____
Facility Owner or Operator: _____
Facility Contact Person: _____ Telephone number: () _____ County: _____
Facility Mailing address: _____
Location of discharge (facility street address): _____
Latitude and Longitude of discharge (if known.): _____

4. Date of receipt of test results or discovery of confirmed discharge: _____ month/day/year 5. Estimated number of gallons discharged: _____

6. Discharge affected: ☐ Air ☐ Soil ☐ Ground water ☐ Drinking water well(s) ☐ Shoreline ☐ Surface water (water body name) _____

7. Method of discovery (check all that apply)

<input type="checkbox"/> Liquid detector (automatic or manual)	<input type="checkbox"/> Internal inspection	<input type="checkbox"/> Closure/Closure Assessment
<input type="checkbox"/> Vapor detector (automatic or manual)	<input type="checkbox"/> Inventory control	<input type="checkbox"/> Groundwater analytical samples
<input type="checkbox"/> Tightness test	<input type="checkbox"/> Monitoring wells	<input type="checkbox"/> Soil analytical tests or samples
<input type="checkbox"/> Pressure test	<input type="checkbox"/> Automatic tank gauging	<input type="checkbox"/> Visual observation
<input type="checkbox"/> Statistical Inventory Reconciliation	<input type="checkbox"/> Manual tank gauging	<input type="checkbox"/> Other _____

8. Type of regulated substance discharged: (check one)

<input type="checkbox"/> Unknown	<input type="checkbox"/> Used/waste oil	<input type="checkbox"/> Jet fuel	<input type="checkbox"/> Heating oil	<input type="checkbox"/> New/lube oil
<input type="checkbox"/> Gasoline	<input type="checkbox"/> Aviation gas	<input type="checkbox"/> Diesel	<input type="checkbox"/> Kerosine	<input type="checkbox"/> Mineral acid
<input type="checkbox"/> Hazardous substance - includes CERCLA substances from USTs above reportable quantities, pesticides, ammonia, chlorine, and derivatives (write in name or Chemical Abstract Service (CAS) number) _____				
<input type="checkbox"/> Other _____				

9. Discharge originated from a: (check all that apply)

<input type="checkbox"/> Dispensing system	<input type="checkbox"/> Pipe	<input type="checkbox"/> Barge	<input type="checkbox"/> Pipeline	<input type="checkbox"/> Vehicle
<input type="checkbox"/> Tank	<input type="checkbox"/> Fitting	<input type="checkbox"/> Tanker ship	<input type="checkbox"/> Railroad tankcar	<input type="checkbox"/> Airplane
<input type="checkbox"/> Unknown	<input type="checkbox"/> Valve failure	<input type="checkbox"/> Other Vessel	<input type="checkbox"/> Tank truck	<input type="checkbox"/> Drum
<input type="checkbox"/> Other _____				

10. Cause of the discharge: (check all that apply)

<input type="checkbox"/> Loose connection	<input type="checkbox"/> Puncture	<input type="checkbox"/> Spill	<input type="checkbox"/> Collision	<input type="checkbox"/> Corrosion
<input type="checkbox"/> Fire/explosion	<input type="checkbox"/> Overfill	<input type="checkbox"/> Human error	<input type="checkbox"/> Vehicle Accident	<input type="checkbox"/> Installation failure
<input type="checkbox"/> Other _____				

11. Actions taken in response to the discharge: _____

12. Comments: _____

13. Agencies notified (as applicable):

<input type="checkbox"/> State Warning Point 1-800-320-0519	<input type="checkbox"/> National Response Center 1-800-424-8802	<input type="checkbox"/> Fire Department. _____	<input type="checkbox"/> County Tanks Program _____	<input type="checkbox"/> DEP (district/person) _____
--	---	---	---	--

14. To the best of my knowledge and belief all information submitted on this form is true, accurate, and complete.

Printed Name of Owner, Operator or Authorized Representative _____

Signature of Owner, Operator or Authorized Representative. _____



Rule 62-710.510 of the Florida Administrative Code requires each registered person to maintain records on either this or a substantially equivalent form which contains the same information. This information must be kept on-site for three (3) years and be available for inspection by DEP during normal business hours. Used Oil Filter information is optional (but recommended), the Used Oil from filter management must be recorded and reported.

DEP Form #62-710.901(2)
Form Title Used Oil and Used Oil Filter
Record Keeping Form
Effective Date June 9, 2005

Print Form

[illegible]

I. TOTAL COLLECTED			J. TOTAL END USED							
	Automotive	Industrial	Mixed							
In State										
Out of State										

Page 1 of 2



Florida Department of Environmental Protection
Twin Towers Office Bldg. • 2600 Blair Stone Road • Tallahassee, Florida 32399-2400

DEP Form # <u>62-761.890(10)(C)</u>
Form Title <u>Containment and Integrity Plan</u> <u>Certification Form</u>
Effective Date <u>July 13, 1998</u>
DEP Application No. _____

Containment and Integrity Plan Certification Form

Use this form to notify the Department of Environmental Protection of:

1. Establishment of the Containment and Integrity Plan.
2. Certification of secondary containment according to Rule 62-761.890(7), F.A.C.
3. Recertification of above times.

Mail to the DEP District Office in your area.

_____ Initial Certification _____ Recertification

1. DEP Facility ID Number: _____ 2. Tank Numbers: _____

3. Facility Name: _____

4. Facility Address: _____

I hereby certify or recertify that the tanks covered under following plans (check appropriate blocks)

☐ Containment and Integrity Plan

☐ Certification of Secondary Containment

comply with the requirements of Rule 62-761.890(7), F.A.C.

P.E. Registration Number, State of Florida

Signature

Name (Type or Print)

Date

Northwest District
160 Governmental Center
Pensacola, Florida 32501-5794
904-463-8390

Northeast District
7825 Baymeadows Way, Suite B 200
Jacksonville, Florida 32256-7577
904-448-1100

Central District
3319 Maguire Blvd. Suite 211
Orlando, Florida 32803-3767
407-894-7155

Southwest District
3804 Coconut Palm Dr.
Tampa, Florida 33619
813-344-6100

South District
2199 Victoria Ave., Suite 361
Fort Myers, Florida 33901
813-332-6915

Southeast District
1900 S. Congress Ave. Suite A
West Palm Beach, Florida 33416
407-433-2650

ATTACHMENT 7

UNIT MANAGEMENT DESCRIPTION

ASTs: As indicated in **Attachments 1 and 6**, there are eight active ASTs (ASTs 1 through 8 and one in-active AST (AST #9), which are located within a secondary containment structure. The used oil is stored in ASTs #1 through #6, AST #7 is used to store oily water, and AST #8 is used to store recyclable coolant. All eight ASTs are connected with aboveground piping to a main loading area located to the southwest of the concrete containment structure. ASTs #9 is in-active, and is not connected to any piping, and is not utilized as part of site operations. **Figure 2** contains a site map which shows the locations of the ASTs. The loading area is for ASTs #1 through #8, which are the main ASTs utilized for site operations. The ASTs are labeled according to tank schedule. Additional information for the active ASTs is provided as follows:

Construction Dates: ASTs 1 through 4 were constructed in the 1920s. ASTs 5 and 6 were constructed in 1981. ASTs 7, 8, and 9 were constructed in 1998.

Structural Support: ASTs 1 through 4 are horizontal tanks, and have steel beams for structural support. ASTs 5 and 6 are horizontal tanks, and have concrete saddles for structural support. ASTs 7 through 9 are vertical tanks, and do not have any vertical support structures.

Secondary Containment: Secondary containment is provided for all of the active ASTs and piping, and loading-unloading areas on-site, and is also shown on **Figure 2**, and in the photographs included in **Appendix A**. The eight active ASTs are located within a block containment structure which has a capacity of approximately 56,540-gallons, which exceeds 110% of the largest AST, which is 20,490-gallons. The following summary of the containment systems in place for the subject facility is provided:

Tank/Piping	Containment
Eight Active ASTs	All eight ASTs are single wall tanks located within a secondary containment structure.
Aboveground piping	All piping is aboveground, and located above a secondary containment structure.
Loading-Unloading connections	Located within a secondary containment structure.

Piping: The piping is all aboveground, and consists of steel pipes and welded joints. ASTs #1 through #5 have 3-inch piping, and ASTs #7 and #8 have 2-inch piping. AST #9 does not have any piping. **Figure 4** shows the piping layout. Photographs of the piping are included in **Appendix A**, and piping is inspected as indicated below.

55-Gallon Drums: The subject site utilizes 55-gallon drums for the storage of used oil filters, which are stored in the spill control building. These 55-gallon drums are transported to a licensed facility, where they are utilized in the manufacturing of manhole covers. Approximately 0 to 60, 55-gallon drums are transported off-site per month.

Management of Stormwater Accumulation in AST Secondary Containment Structure: According to site personnel, any water which accumulates within the main containment structure as a result of rainfall evaporates. Site personnel indicated that no stormwater has ever been discharged or released from the secondary containment area to the subject site, or off-site.

Management of Stormwater Accumulation in AST Loading/Unloading Secondary Containment Structure: According to site personnel, the majority of water which accumulates in the loading secondary containment area evaporates. During the wet season, any excess water which does not evaporate is pumped out, and put in AST #7. The oily water is then disposed at a state certified treatment facility. According to site personnel, this is approximately 0 to 500 gallons per year. No water from the loading/unloading secondary containment area is discharged or released to the subject site or off-site.

Facility Inspection Procedures: The inspection procedures conducted by Fuels Unlimited Inc. consist of daily, monthly, and annual inspections. Any written records generated as part of the inspections conducted pursuant to this permit are to be retained for a period of three years, and are readily available for regulatory officials during an inspection. Specific information is provided as follows:

Daily Visual Inspections: Daily visual inspections consist of inspection of the ASTs, piping, the secondary containment structure, and the loading areas to check for tank damage or leakage. In addition, the outside of the containment structure will be inspected for signs of deterioration. If any deficiencies are noted as a result of any daily inspections, the following items apply:

The Plant Manager of Fuels Unlimited Inc. is to be notified immediately. The Plant Manager will evaluate the deficiency with respect to the criteria for response procedures, contained in **Attachment 6**.

Applicable corrective actions, if warranted, are to be implemented. The daily inspections are documented on a weekly log.

Monthly Inspections: Monthly Inspections are performed and documented by the Fuels Unlimited Inc. Plant Manager or Assistant Plant Manager. Monthly inspections are documented in a written log and the following items are included in the Periodic Inspections:

All ASTs are checked monthly for the presence of water at the lowest possible points inside the tank and water found is removed. Any water removed is handled as discussed in other sections of this permit application

All ASTs are inspected monthly for visual evidence of leaks, or damage to the ASTs.

The containment structures are inspected monthly for damage or other items which would reduce the effectiveness of the containment structures.

All aboveground piping and valves are inspected for visual evidence of leaks or damage.

Annual Inspection: On an annual basis, all O-ring gaskets of the emergency vents are checked, and the tank supports, anchor bolts, and foundations are checked for signs of damage, deterioration or settlement.

A copy of the inspection logs for the daily, monthly and annual inspections in 2011 are included in **Appendix D.**

Procedure for Checking for Water in the Tanks: Fuels Unlimited Inc. tanker/tank trucks each have two compartments which allow each driver to separate water from used oil at the time of initial pick up. Once at the facility, the driver checks each used oil compartment in the tanker for the presence of water prior to pumping the ASTs. This procedure is effective in keeping the majority of any oily water out of the used oil ASTs.

In addition, Fuels Unlimited Inc. personnel check the ASTs for the presence of water in the ASTs weekly.

ATTACHMENT 8

CLOSURE PLAN

1. Closure Plan Criteria:

This closure plan for Fuels Unlimited Inc. has been prepared in accordance with Chapter 62-710.800(5), which requires the following:

- a. There will be no need for further facility maintenance.
- b. Used oil will not contaminate surface or groundwater.
- c. All tanks, piping, secondary containment, and ancillary equipment will be emptied, cleaned and decontaminated and all materials removed and managed.
- d. The closure plan shall be updated whenever significant operations changes occur or design changes are made.
- e. The owner or operator shall submit a detailed closure plan to the Department at least 60 days prior to the scheduled date of closing the facility.
- f. Within 30 days after closing the facility, the owner or operator shall submit a certification of closure completion to the Department which demonstrates that the facility was closed in substantial compliance with the detailed closure plan. Within 30 days of determining that the facility was closed in accordance with its closure plan, the Department shall release the facility from its financial assurance obligations.
- g. The owner or operator shall estimate the costs of closing the facility using Form 62-710.901(7). The owner or operator shall continue to annually adjust the closing cost estimate for inflation and changes in the closure plan, and shall submit updated information to the Department between January 1 and March 1 of each year.

2. Specific Closure Plan Activities

- a. All used oil, recyclable coolant, and oily water, will be removed from the ASTs at the facility and either sold, or disposed of at an approved facility.
- b. All sludge will be removed from each AST, which will be sampled, and disposed of as a non-hazardous waste.
- c. All ASTs will be decontaminated by entering each AST and pressure washing each AST. All piping will be decontaminated by pressure washing. All wash water from the ASTs and piping will be removed via the existing piping network, placed in a tanker, and transported off-site for disposal at an approved facility.

d. The secondary containment area beneath the ASTs and the loading/unloading area will be decontaminated by pressure washing as needed. All wash water from the decontamination of the secondary containment areas will be recovered by a vacuum truck, and transported off-site for proper disposal.

e. In order to demonstrate clean closure, it is proposed that soil and groundwater sampling in accordance with FDEP Closure Assessment requirements be conducted. Initially, five soil borings will be installed and the samples will be examined for visual evidence of used oil contamination. Based on the results of the visual examination, three samples will be collected for laboratory analyses. Three groundwater samples will also be collected from these locations. The soil and groundwater samples will be collected in accordance with procedures contained in DEP-SOP-001/01. The samples will be analyzed for used oil parameters including EPA Method 8260 and 8270 parameters, Total Petroleum Hydrocarbons (TPH), and arsenic, cadmium, chromium, and lead. The laboratory analyses will be conducted by a laboratory certified by the Florida Department of Health, and NELAC certified. Groundwater samples will be obtained by installing three monitoring wells to a depth of approximately 14 feet, which will be screened from 4 feet to 14 feet below land surface. A Closure Report will be submitted to the Department, which will summarize the soil and groundwater sampling activities, and laboratory analytical results.

3. Closure Cost Estimate

The estimated closure cost for Fuels Unlimited Inc. will be calculated and submitted to the FDEP by May 26, 2012, using FDEP Form #62-710-901(7), effective June 9, 2005. The owner or operator shall annually adjust the closing cost estimate for inflation and changes in the closure plan, and shall submit updated information to the Department between January 1 and March 1 of each year.

4. Schedule for Closure

- a. Submit detailed Closure Plan to the Department 60 days prior to closure.
- b. Remove used oil in the ASTs by selling it to customers.
- c. Remove all sludge from the ASTs.
- d. Decontaminate ASTs, piping, and secondary containment areas.
- e. Conduct closure assessment activities.
- f. Submit Closure Assessment Report to the Department within 30 days after completion of closure activities.

ATTACHMENT 9

TRAINING

1. Fuels Unlimited Inc. Employees:

- a) All truck drivers are required to have valid "CDL" drivers licenses prior to employment. Any new personnel involved in the driving of used oil, oily water or recyclable coolant will receive a briefing on the applicable laws and rules before unsupervised driving of a Fuels Unlimited Inc. transportation vehicle.
- b) All Fuels Unlimited Inc. drivers and operations personnel will complete USDOT hazardous materials training pursuant to 49 CFR, Part 174.704, HAZMAT General & Security Awareness. This will be completed by all applicable Fuels Unlimited Inc. personnel by August 1, 2012. The FDOT requires that this course be repeated every three years, which will be completed by all applicable Fuels Unlimited Inc. every three years.
- c) Any new Fuels Unlimited Inc. personnel involved in the handling of used oil, oily water and recyclable coolant will receive a briefing on facility procedures, management practices, spill prevention, safety, and spill response procedures prior to initiation of duties. Also, any new Fuels Unlimited personnel will complete the USDOT hazardous materials training pursuant to 49 CFR, Part 174.704, within 30 days of being hired.
- d) Any new Fuels Unlimited Inc. personnel involved in the handling of used oil and recyclable coolant will receive a briefing on compliance with state and federal rules governing used oil prior to the initiation of duties.
- e) Any new Fuels Unlimited Inc. personnel involved in the pick up of used oil will receive a detailed briefing regarding the Fuels Unlimited Inc.'s standard operating procedures for halogen screening at each pick up location, prior to the initiation of duties. This shall include instrument specifications and capabilities, calibration methods and frequency, procedures for handling situations where the halogens levels are greater than 1000 ppm and record keeping procedures for all loads accepted or refused.
- f) Documentation that all Fuels Unlimited Inc. personnel handling or transporting used oil, oily water and recyclable coolant have completed the above items. A training file will be established for each Fuels Unlimited Inc. employee, and maintained for a period of three years after completion of employment. These records will include the type of training received, who provided it, along with the dated signature of those receiving and providing the training.
- g) Monthly spill prevention briefings will be provided by Fuels Unlimited Inc. for all employees who are involved with transporting, handling, receipt, and transfer of used oil. These briefings will include emphasis on the importance of having the proper connection and settings for the

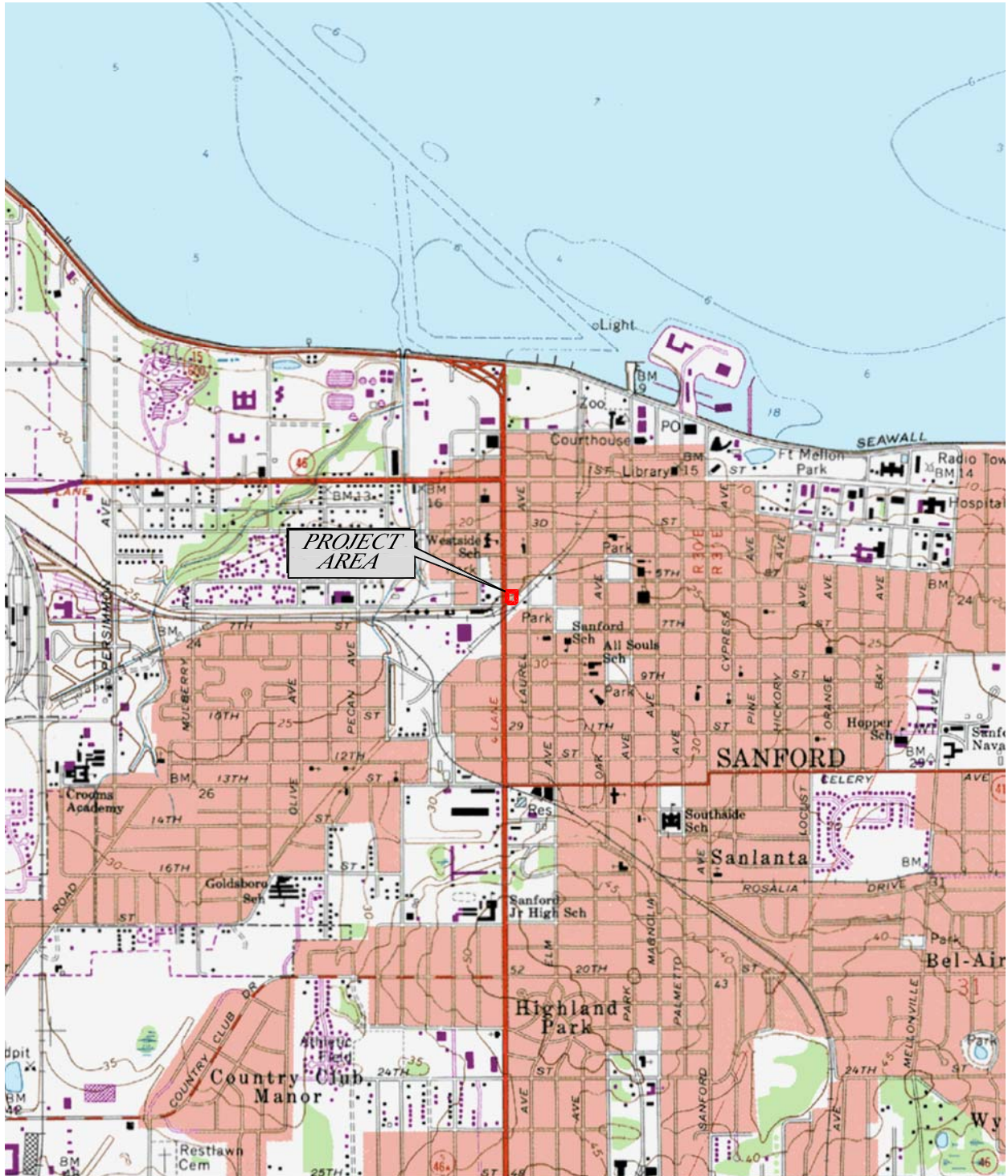
pumps for the tank truck, emphasis on safety, and a review of the Contingency Plan with respect to Fuels Unlimited Inc.'s response procedures.

h) Fuels Unlimited Inc. will review the items in the preceding paragraphs a through g above on an annual basis to insure the training program is updated to address any changes in regulations or address any changes in facility operations. The records for each annual review will be maintained on-site for three years.

2. Drivers of Customers Who Deliver Used Oil:

For drivers of customers who deliver used oil to the Fuels Unlimited Inc. facility, they will receive a briefing on by Fuels Unlimited Inc. personnel regarding facility procedures, spill prevention, safety, and spill response procedures ***prior to delivery of used oil products, oily water, or recyclable coolant.***

FIGURES



REFERENCE: U.S.G.S. "SANFORD, FLORIDA" QUADRANGLE MAP
SECTION: 39 ISSUED: 1965
TOWNSHIP: 19 SOUTH PHOTOREVISED: 1988
RANGE: 30 EAST



**Andreyev
Engineering,
Inc.**

USED OIL PROCESSING PERMIT APPLICATION
**FUELS UNLIMITED INC.
(D.B.A. OILS UNLIMITED)**
509 SOUTH FRENCH AVENUE
SANFORD, SEMINOLE COUNTY, FLORIDA

APPROXIMATE SCALE:

1"=2000'

DATE: 04/30/12

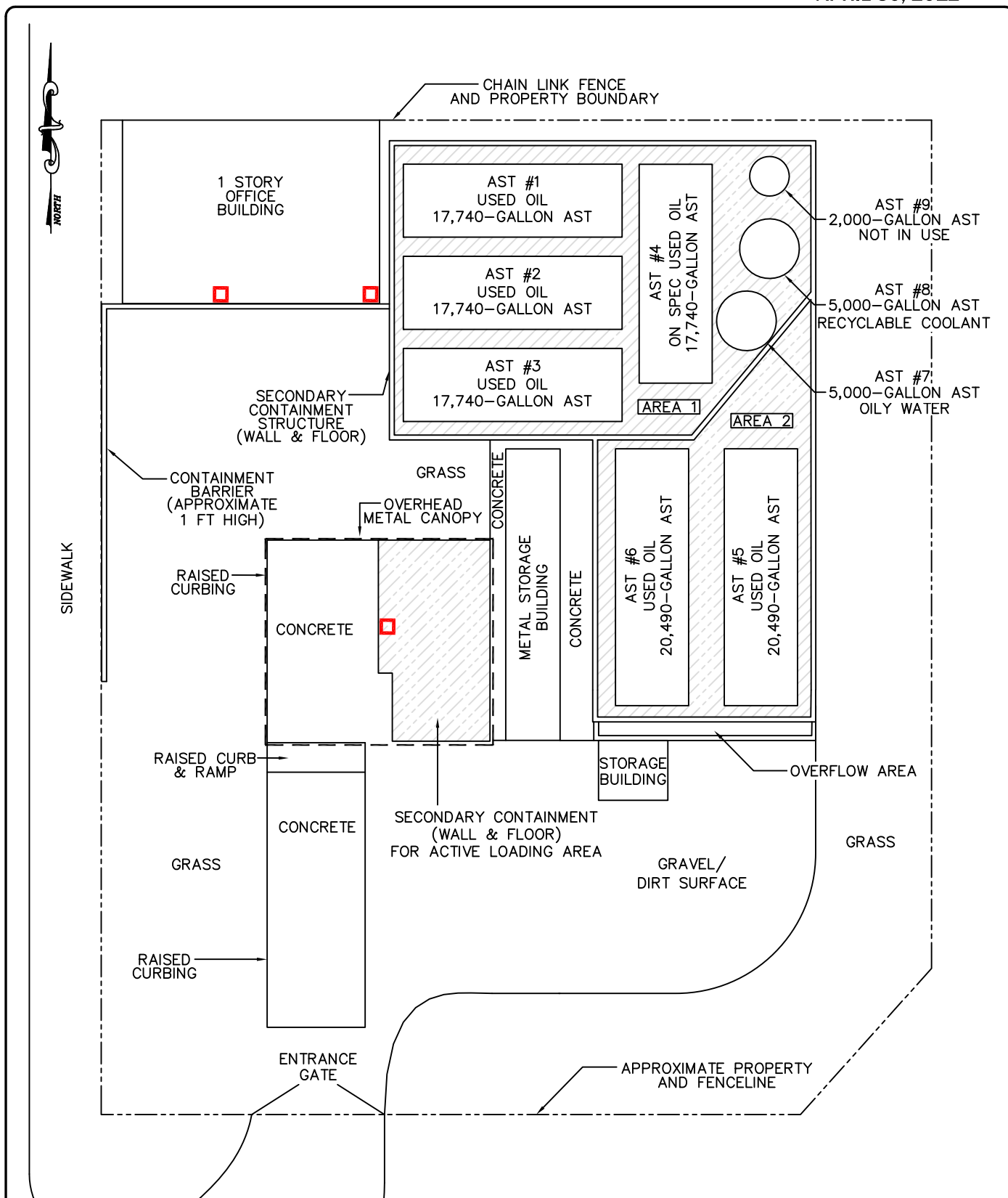
PN:EPEN-11-0233

ENGINEER: JJ

DRAWN BY: DLS

U.S.G.S. TOPOGRAPHIC MAP

FIGURE 1



LEGEND/NOTES:

FIRE EXTINGUISHER LOCATIONS

SECONDARY CONTAINMENT AREAS

NOTE: THE METAL STORAGE BUILDING IS USED FOR THE STORAGE OF 55-GALLON DRUMS CONTAINING NON-HAZARDOUS SLUDGE AWAITING FOR TRANSPORT FOR PROPER OFF-SITE DISPOSAL & SPILL CONTROL EQUIPMENT.



**Andreyev
Engineering,
Inc.**

APPROXIMATE SCALE:

1"=20'

DATE: 04/30/12

ENGINEER: JJ

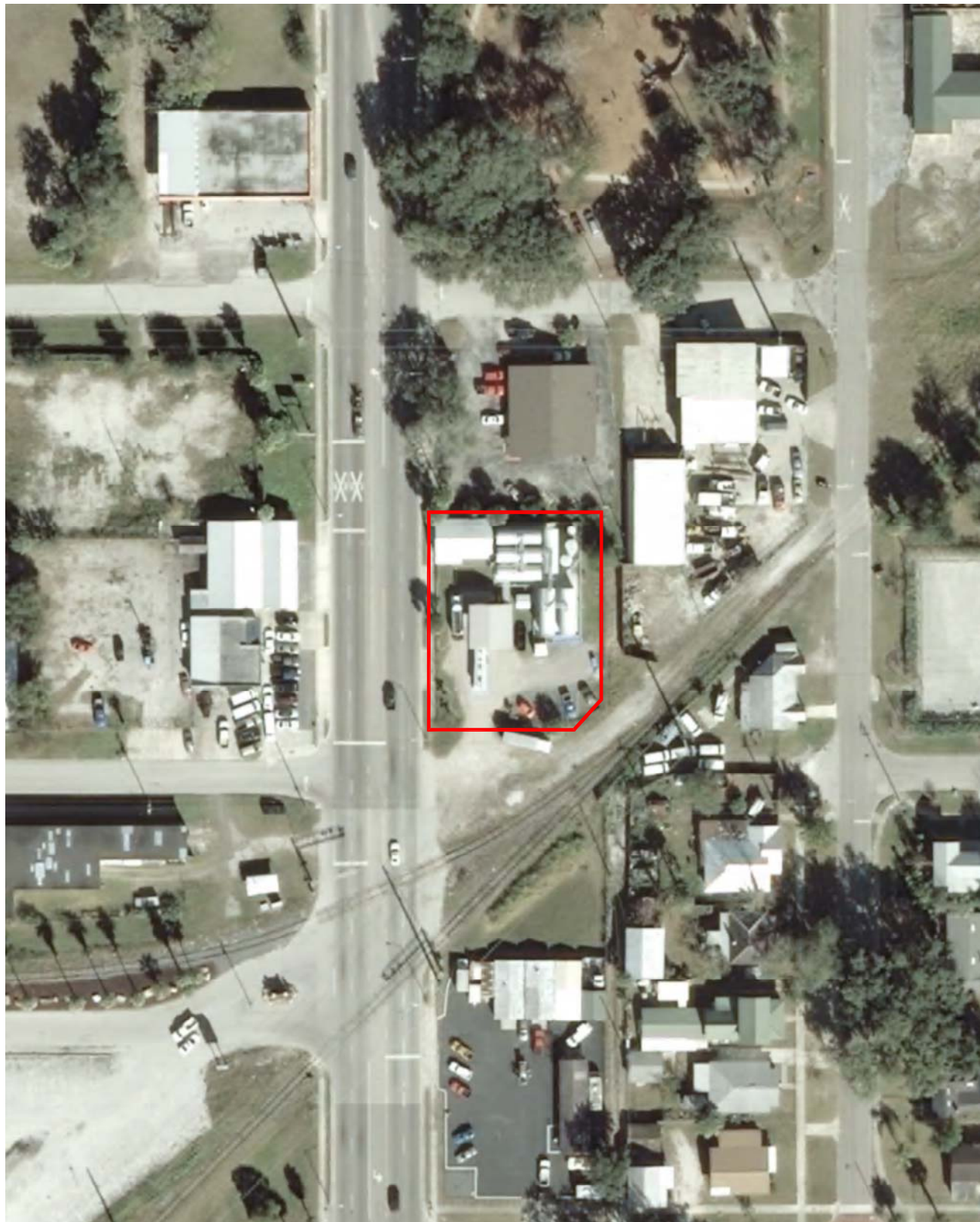
PN:EPEN-11-0233

DRAWN BY: DLS

USED OIL PROCESSING PERMIT APPLICATION
**FUELS UNLIMITED INC.
(D.B.A. OILS UNLIMITED)**
509 SOUTH FRENCH AVENUE
SANFORD, SEMINOLE COUNTY, FLORIDA

SITE MAP

FIGURE 2



LEGEND:

— APPROXIMATE SUBJECT
PROPERTY BOUNDARY



**Andreyev
Engineering,
Inc.**

APPROXIMATE SCALE:

1"=100'

DATE: 04/30/12

ENGINEER: JJ

PN:EPEN-11-0233

DRAWN BY:DLS

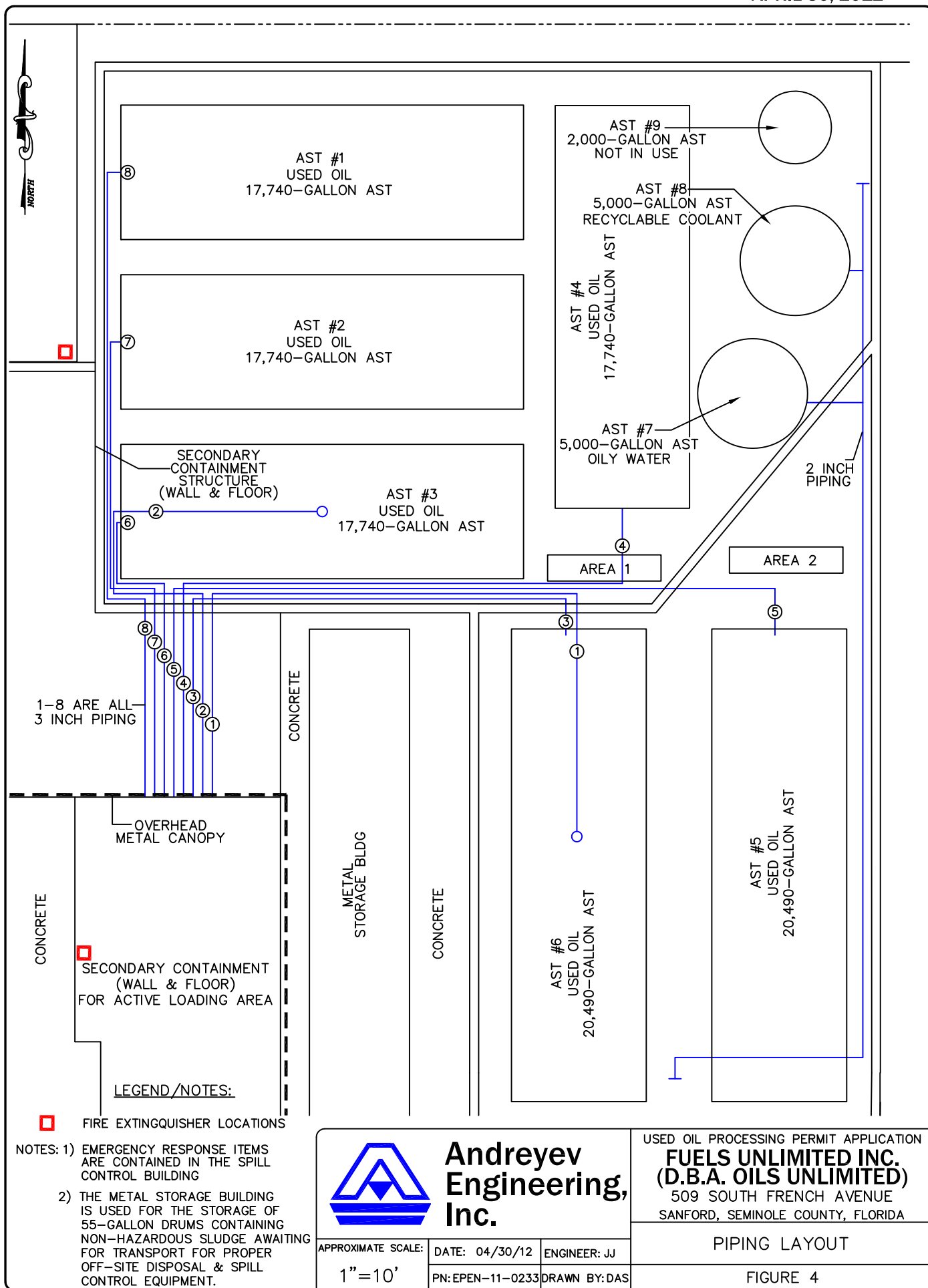
USED OIL PROCESSING PERMIT APPLICATION

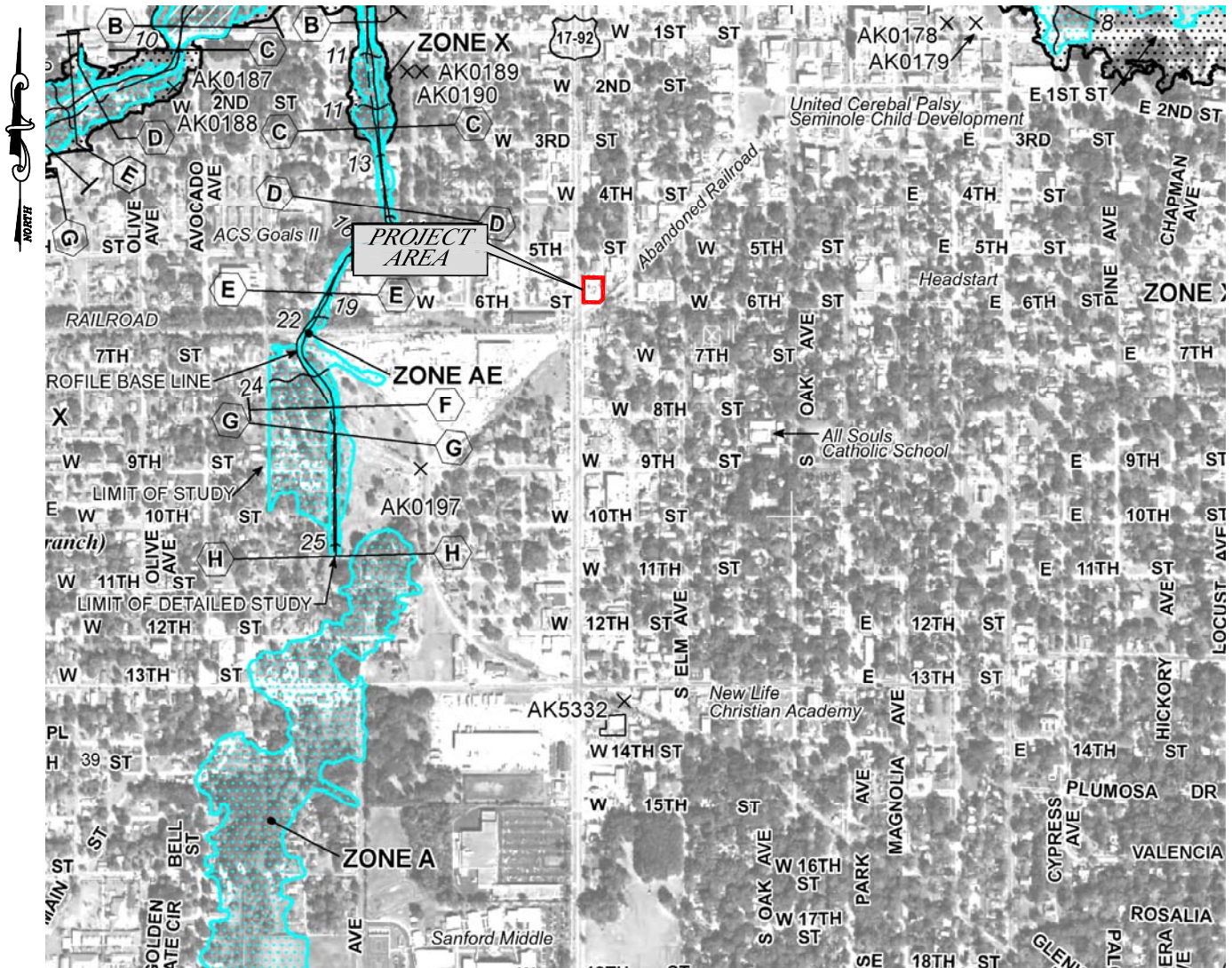
**FUELS UNLIMITED INC.
(D.B.A. OILS UNLIMITED)**

509 SOUTH FRENCH AVENUE
SANFORD, SEMINOLE COUNTY, FLORIDA

2009 AERIAL PHOTOGRAPH

FIGURE 3





LEGEND

SPECIAL FLOOD HAZARD AREAS (SFHAs) SUBJECT TO INUNDATION BY THE 1% ANNUAL CHANCE FLOOD EVENT

The 1% annual chance flood (100-year flood), also known as the base flood, is the flood that has a 1% chance of being equaled or exceeded in any given year. The Special Flood Hazard Area is the area subject to flooding by the 1% annual chance flood. Areas of Special Flood Hazard include Zones A, AE, AH, AO, AR, A99, V, and VE. The Base Flood Elevation is the water-surface elevation of the 1% annual chance flood.

- ZONE A** No Base Flood Elevations determined.
- ZONE AE** Base Flood Elevations determined.
- ZONE AH** Flood depths of 1 to 3 feet (usually areas of ponding); Base Flood Elevations determined.
- ZONE AO** Flood depths of 1 to 3 feet (usually sheet flow on sloping terrain); average depths determined. For areas of alluvial fan flooding, velocities also determined.
- ZONE AR** Special Flood Hazard Area formerly protected from the 1% annual chance flood event by a flood control system that was subsequently decertified. Zone AR indicates that the former flood control system is being restored to provide protection from the 1% annual chance or greater flood.
- ZONE A99** Areas to be protected from 1% annual chance flood event by a Federal flood protection system under construction; no Base Flood Elevations determined.
- ZONE V** Coastal flood zone with velocity hazard (wave action); no Base Flood Elevations determined.

ZONE VE Coastal flood zone with velocity hazard (wave action); Base Flood Elevations determined.

FLOODWAY AREAS IN ZONE AE

The floodway is the channel of a stream plus any adjacent floodplain areas that must be kept free of encroachment so that the 1% annual chance flood can be carried without substantial increases in flood heights.

OTHER FLOOD AREAS

ZONE X Areas of 0.2% annual chance flood; areas of 1% annual chance flood with average depths of less than 1 foot or with drainage areas less than 1 square mile; and areas protected by levees from 1% annual chance flood.

OTHER AREAS

ZONE X Areas determined to be outside the 0.2% annual chance floodplain.

ZONE D Areas in which flood hazards are undetermined, but possible.

COASTAL BARRIER RESOURCES SYSTEM (CBRS) AREAS

OTHERWISE PROTECTED AREAS (OPAs)

CBRS areas and OPAs are normally located within or adjacent to Special Flood Hazard Areas.



**Andreyev
Engineering,
Inc.**

USED OIL PROCESSING PERMIT APPLICATION
**FUELS UNLIMITED INC.
(D.B.A. OILS UNLIMITED)**
509 SOUTH FRENCH AVENUE
SANFORD, SEMINOLE COUNTY, FLORIDA

APPROXIMATE SCALE:

1"=1000'

DATE: 04/30/12

ENGINEER: JJ

PN:EPEN-11-0233

DRAWN BY: DLS

FLOOD INSURANCE RATE MAP
SEPTEMBER 28, 2007

FIGURE 5

APPENDICES

APPENDIX A
SITE PHOTOGRAPHS

Site Photographs
Fuels Unlimited Inc.
509 South French Avenue, Sanford, Seminole County, Florida
January 30, 2012

			
Photo #1: View of the office and the loading area, facing north.		Photo #2: View of the AST area located to the east of the office, facing northeast.	
			
Photo #3: View of the loading area, facing east.		Photo #4: View of the southeastern portion of the AST area, facing north.	
			
Photo #5: View of the northeastern portion of the AST area, facing south.		Photo #6: View of the northeastern portion of the AST area, facing west.	

**Site Photographs
Fuels Unlimited Inc.
509 South French Avenue, Sanford, Seminole County, Florida
January 30, 2012**

	
Photo #7: View of the northeastern portion of the secondary containment area, facing south.	Photo #8: View of the northwestern portion of the secondary containment area, facing east.
	
Photo #9: View of the northwestern portion of the secondary containment area, facing south.	Photo #10: View of AST #8 located in the northeast portion of the secondary containment area, facing northwest.
	
Photo #11: View of the southern portion of the secondary containment area for ASTs 1, 2, & 3, facing west.	Photo #12: View of the southern portion of the secondary containment area for ASTs 5 & 6, facing west.

APPENDIX B

HALOGEN SCREENING STANDARD OPERATING PROCEDURES

Halogen Screening Standard Operating Procedures

for Fuels Unlimited, Inc. dba Oils Unlimited

Fuels Unlimited, Inc. dba Oils Unlimited conducts field screening (testing) of used oil to prevent costly hazardous waste from being mixed with non-contaminated oil for proper management and disposal. In addition to other criteria, the following were considered when developing this halogen determination and testing methodology:

- Employee safety;
- Simple, quick and relatively low set-up cost by using existing technologies;
- Containment and recovery of the halogens released from the used oil (i.e., eliminate atmospheric release of ozone depleting chemicals);
- Compliance with the requirements of state and federal health and safety codes.

Test instrument specifications:

This company is currently using Clor-D-Tect 1000 Chlorine Halogen Test Kit manufactured by Dexsil Corporation

AND, OR,

This company is currently using a model #TIFRX-1A CFC detection device (sniffer) manufactured by TIF

The instrument(s) are calibrated using the following method(s):

The calibration is done by using a standard with 900 ppm of halogens.

Calibration is performed on a bi-weekly basis.

Transporter Drivers, managers and employees of Fuels Unlimited, Inc. dba Oils Unlimited are given training on the use and application of chlorine field test kits and CFC detection devices (sniffers) as follows:

Employees are trained at the start of their employment with the company and re-trained throughout the term of their employment. These re-trainings are logged and records are kept in the employee files.

Field testing and sampling either from the generator's storage tank or from a sample taken in accordance with EPA Regulations and ASTM Methods is accomplished by:

Field testing is done by using the CFC Detection device (sniffer) to determine halogen level. If the sniffer has a negative result, a Clor D Tect 1000 halogen test is done to determine the halogen level on site at the generators location.

All loads that have been tested and indicate halogen levels in excess of 1,000 PPM are handled as follows:

We do not pump any oil(s) with a halogen level over 1,000 ppm as determined on site.

After the testing is completed and the used oil is certified as on-specification fuel, it and the corresponding documentation will be marketed as such. If the halogen test result from that product shows that the used oil contains more than 1,000 ppm total halogens, the load and shall be rejected and FDEP will be provided with the test results within seven (7) days of obtaining them.

In the event Fuels Unlimited, Inc. dba Oils Unlimited has a need for or is required to use the services of a third party for halogen screening analysis (Certified Test Lab), that party is:

Laboratory Name: PhosLab Environmental Services
Address: 806 W. Beacon Road
City, State, Zip: Lakeland, Florida 33803-2847
Phone: 863-682-5897 Fax: 863-683-3279
Attention: George Fernandez or Dave Pomella

In compliance with F.S. 62-710, Used Oil management Rule, and 40 CFR SS 279.44(b) and 279.44(d), 279.70(c), and 279.63, respectively, the documentation and records for all loads of used oil products and materials-either picked up or refused at a generator's facility, are maintained for three years at the company's main office located at 509 S. French Avenue, Sanford, Florida 32771.

Generator Education: it is the goal of Fuels Unlimited, Inc. dba Oils Unlimited to instruct and educate its generator customers not to allow mixing of halogenated solvents or paint thinners with waste oil or used oil filters. The generators are warned that doing so, could result in the mixture being required to be disposed of as hazardous waste.

APPENDIX C

SECONDARY CONTAINMENT CALCULATIONS

SECONDARY CONTAINMENT CALCULATIONS

Area 1, Northern Area of Secondary Containment:

- a. Area 1 has a total area measurement of 2,370 square feet. Other items which occupy surface area within the secondary containment structure include two 5,000-gallon ASTs, one 2,500 gallon AST, 16 1 x 1.6 block supports, and 8, 1 x 3.0 block supports.
- b. The diameter of the 5,000-gallon ASTs is 7 feet. The area associated with one 5,000-gallon AST is determined by $3.141 \times 3.5^2 = 38.5$ square feet. For two ASTs, the total area is 77 sq. ft.
- c. The area associated with one 2,500-gallon AST is determined by $3.141 \times 1.75^2 = 9.6$ square feet.
- d. The area associated with 16 supports which measure 1.0 ft by 1.6 ft is 16 sq ft.
- e. The area associated with 8 supports which measure 1.0 ft. by 3.0 ft is 24 sq ft.
- f. 2,370 square feet minus 77, 9.6, 16 and 24 = 2,243 square feet.
- g. The depth of secondary containment structure is 2.3 feet. The cubic feet of Area 1 is determined by 2,243 sq. ft x 2.3 = 5,160 cubic feet. The gallons for Area 1 is determined by 5,160 cubic feet x 7.48 gallons/cubic ft = 38,597 gallons.

Area 2, Southern Area of Secondary Containment:

- a. Area 2 has a total area measurement of 1,180 square feet. Other items which occupy surface area within the secondary containment structure include 6 concrete block saddles which are 2.6 ft wide and 8.8 feet long.
- b. The area associated with 6 concrete saddles is 137 sq ft.
- c. 1,180 square feet minus 137 sq ft = 1,043 square feet.
- g. The depth of secondary containment structure is 2.3 feet. The cubic feet of Area 2 is determined by 1,043 sq. ft x 2.3 = 2,399 cubic feet. The gallons for Area 2 is determined by 2,399 cubic feet x 7.48 gallons/cubic ft = 17,943 gallons.

The Total Capacity of Secondary Containment Area is 56,540 gallons.

APPENDIX D
COPY OF INSPECTION SHEETS FOR 2011

Annual Tank Farm Inspection Form

Date: Monday, January 10, 2011

Performed by: Calvin Patterson

Check the following items:

			Action needed
Tank Supports	Pass ✓	Fail	Y N
Anchor Bolts	Pass ✓	Fail	Y N
Foundation	Pass ✓	Fail	Y N
Gaskets in Vent	Pass ✓	Fail	Y N

Please note any signs of damage, deterioration or settlement to foundation if present.

Action Required: NONE

Action Taken: NONE

FACILITY ADDRESS 509 S French Ave I.D.# 8516543 Sanford FL 32771			ABOVEGROUND STORAGE TANK VISUAL INSPECTION CHECKLIST						
Year	MONTH	DATE	SECONDARY CONTAINMENT INTEGRITY	TANK EXTERIOR INTEGRITY	PIPING EXTERIOR INTEGRITY	DRAIN VALVE SECURE	LIQUID ACCUMULATION REMOVAL	STAINED SOIL AROUND CONTAINMENT AREA	INITIALS
2011	JANUARY	1/4	✓	✓	✓	✓	✓	✓	(KJ)
	FEBRUARY	2/2	✓	✓	✓	✓	✓	✓	KJ
	MARCH	3/1	✓	✓	✓	✓	✓	✓	(KJ)
	APRIL	4/5	✓	✓	✓	✓	✓	✓	(KJ)
	MAY	5/3	✓	✓	✓	✓	✓	✓	(KJ)
	JUNE	6/3	✓	✓	✓	✓	✓	✓	(KJ)
	JULY	7/3	✓	✓	✓	✓	✓	✓	(KJ)
	AUGUST	8/1	✓	✓	✓	✓	✓	✓	(KJ)
	SEPTEMBER	9/6	✓	✓	✓	✓	✓	✓	(KJ)
	OCTOBER	10/3	✓	✓	✓	✓	✓	✓	(KJ)
	NOVEMBER	11/4	✓	✓	✓	✓	✓	✓	(KJ)
	DECEMBER	12/6	✓	✓	✓	✓	✓	✓	(KJ)
OTHER COMMENTS:									

Weekly Tank Farm Inspection Form

Week of: Feb 6 Thru Feb 12, 2012

Date	Mon	Tue	Wed	Thu	Fri	Sat	Sun
Time	2612	2712	2812	2912	21012	21112	21212
	700	630	700	630	630	800	800
Did not appear to have any issues or concerns	✓	✓	✓	✓	✓	✓	✓
Tank #1	✓	✓	✓	✓	✓	✓	✓
Tank #2	✓	✓	✓	✓	✓	✓	✓
Tank #3	✓	✓	✓	✓	✓	✓	✓
Tank #4	✓	✓	✓	✓	✓	✓	✓
Tank #5	✓	✓	✓	✓	✓	✓	✓
Tank #6	✓	✓	✓	✓	✓	✓	✓
Tank #7	✓	✓	✓	✓	✓	✓	✓
Tank #8	✓	✓	✓	✓	✓	✓	✓
Tank #9	NIU	NIU	NIU	NIU	NIU	NIU	NIU
Remarks	RCP	RCP	RCP	RCP	RCP	RCP	RCP