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 X Modification Date	old permit e	xpires <u>A</u>	\pr22,1 ₽
2. Revision number			
3. NOTE: Processors must also meet all applicable subparts, (de 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 x are disposing of used oil (Subpart 1)	scribe compl	iance in	process
4. Date current operation began: Jan 1, 2000			
5. Facility name: Safety-Kleen Systems, Inc.			
6. EPA identification number: FLR 000 060 301			
7. Facility location or street address: 359 Cypress Road			
 Facility mailing address: 359 Cypress Road 	Ocala	FL	34472
Street or P.O. Box	City	State	Zip Code
9. Contact person: Jeff Curtis Title: EHS Manager	_ Telephone:	(<u>561)52</u>	3-4719
Mailing Address: 359 Cypress Road	Ocala	FL	34472
Street or P.O. Box	City	State	Zip Code
10. Operator's name: Safety-Kleen Systems, Inc.	Telephon	e: (972)2	265-2000
Mailing Address: 5360 Legacy Drive, Building 2, Suite 100	Plano	тх	75024
Street or P.O. Box	City	State	Zip Code
11 Facility owner's name: Safety-Kleen Systems, Inc.	Teleph	one: <u>972</u>)265-2000
Mailing Address: 5360 Legacy Drive, Building 2, Suite 100	Plano	ТΧ	75024
Street or P.O. Box	City	State	Zip Code
12 Legal structure: corporation (indicate state of incorporation) Wiscons	sin		

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)

Name: Mailing Address:			<u></u>
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Mailing Address:			
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Name:			
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If an individual, partnership, or business is operating under an assumed name, enter the county and

State N/A

state where the name is registered: CountyN/A

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.

ATTACHMENT A

DESCRIPTION OF FACILITY OPERATIONS Revised 05/01/12



DESCRIPTION OF FACILITY OPERATIONS

This is an existing facility that is engaged in the processing of used oil and certain non-hazardous solid wastes. In addition, the facility stores and transfers used antifreeze and used oil filters. The facility has forty-eight (48) above ground storage tanks ranging from 500 gallons to 159,000 gallons. Twenty-six (26) of these tanks with a total capacity of 885,000 gallons are used oil tanks. The rail spur area generally holds three (3) to four (4) rail cars with 25,000 gallons capacity each on-site. In addition, there are 9 vessels involved in the processing of used oil located in the processing area of the warehouse. All tanks are listed in Attachment B. The processing and wastewater treatment system is situated within an enclosed building that is constructed on a 6-inch reinforced, sealed concrete slab. The processing area of the facility is approximately 13,000 square feet (ft²) and occupies the north side of the warehouse building. The warehouse/drum storage area occupies approximately 13,000 (ft²) and is constructed on an 8-inch reinforced, sealed concrete slab. Approximately 15 employees work at the site.

The facility is presently authorized to operate under Permit Number 161967-HO-004, which expires on April 22, 2012.

ATTACHMENT B

FACILITY DETAIL PROCESS DESCRIPTION Revised 05/01/12



The Safety-Kleen Systems, Inc. Ocala (S-K) facility is primarily engaged in processing of used oil into recycled fuel oil. In addition, the facility processes and bulks certain non-hazardous solid waste streams for transport to a solid waste landfill. The facility also conducts the storage of used oil, non-hazardous industrial wastewater, used antifreeze, used oil filters, and other petroleum contaminated materials. The facility is located in Ocala, Florida. Used oil and related used oil products (filters, etc.) may come from a variety of sources including, but not limited to:

- Automotive and industrial used oil lubricants, coolants and wash waters;
- Bilge slop/wash waters from the shipping industry;
- Wastewater and oils from storage tanks, pits, ponds and containments from manufacturing operations;
- Wastewater and oils from petroleum storage facilities;
- Petroleum contact water as defined in Chapter 62-740, Florida Administrative Code (F.A.C.), and
- Solid waste from industrial generators (primarily oil filter and used oil containers).

S-K is dedicated to the transfer operations of industrial wastewater, petroleum contact water (PCW) and contaminated petroleum products through a relatively simple process which recovers petroleum product and then stores the industrial wastewater prior to shipment to a permitted pre-treatment facility or onsite disposal by dehydrated distillation. The offsite permitted pretreatment facility pretreats the industrial waste and discharges it to a permitted publicly owned treatment works (POTW). S-K markets "used oil" for resale as industrial burner fuel. The processed "used oil" is called "recycled fuel oil" (RFO). S-K also processes solid waste in at the Solid Waste Management Area (SWMA) at the facility. The solid waste to be accepted, processed, stored or otherwise managed at the facility are as follows: petroleum contaminated soil, petroleum contaminated sorbet materials (e.g. pads, booms, rags, vermiculite, etc.), personal protective equipment (PPE), petroleum contaminated debris associated with a spill such as gravel, rock, concrete, asphalt and de minimus quantities of other petroleum storage tank



ATTACHMENT B-REVISED 05/01/12 FACILITY DETAIL PROCESS DESCRIPTION

systems regulated pursuant to Chapter 62-761, F.A.C., non-regulated petroleum storage tank systems, pits, containment areas, sumps and tanks, petroleum contaminated water (PCW) as defined in Rule 62-740.030(1), F.A.C., petroleum contaminated sediments, sludges and liquids that originate from oil/water separators at residential car washes, rollover care washes, and tunnel car washes as defined in Rule 62-660.803(3), F.A.C., empty petroleum contaminated drums, pails, gas tanks, and fuel filters not otherwise constituting "used oil", and non-hazardous, non-liquid waste streams generated from the on-site used oil processing and industrial wastewater pretreatment facilities.

Figure 1 is a site map illustrated to scale of the facility which illustrates the locations of the major process areas subsequently discussed in this Attachment.

The facility has two buildings. The two buildings are the main office and the warehouse building. The facility has other structures that include a tank farm, a drum storage area (inside the warehouse), a used oil processing system (inside the warehouse), a chemical storage building (inside the warehouse, five sumped loading/unloading areas and a solid waste processing area inside the SWMA. The core mission of this S-K facility is to:

- 1) Receive, store, process, treat and market used oil,
- 2) Receive, store and transfer used oil filters,
- 3) Generate, receive, store, transfer and ship offsite industrial wastewater; and
- 4) Generate, receive, store, transfer and process solid waste.

The activities that S-K will continue to conduct include used oil storage, used oil processing, used oil treatment, used oil marketing, used oil filter storage, used oil filter transfer operations, used oil filter disposal, solid waste storage, solid waste solidification, solid waste transfer operations, and solid waste disposal or treatment at a permitted facility.

S-K is a used oil processor because more than 25,000 gallons of used oil is stored in the tank farm, the used oil is stored for more than 35 days and water and/or solids are removed from the used oil by elementary settling in individual tanks, filtration, shaker processing, de-hydration distillation, or re-refining.



Used oil is stored in tanks and containers. Used oil filters and used oil residuals are stored in containers or covered roll-off boxes with sealed doors. Solid waste will be stored in containers or roll-off boxes and will be processed in the SWMA.

Solid wastes will be accepted at the facility in two locations. Containers of eighty-five (85) gallons or less will be off-loaded at the drum storage area, and larger containers (bulk) will be taken directly to the solid waste management area (SWMA) and off-loaded into the pit. From the drum storage area properly sealed containers on pallets will be transferred to the SWMA via forklift and emptied into the SWMA where the material will be solidified using lime dust (or like material). The materials will then be placed into roll-off boxes, covered and then transported to a permitted solid waste facility for disposal. Solid waste containers will be stored in the drum storage area for no longer than two (2) weeks before being transferred to the SWMA for processing and solidification. Processed solid waste roll-off boxes will be covered and stored at the SWMA for no longer than four (4) weeks before transport to a permitted solid waste facility for disposal.

FACILITY OPERATIONS

Truck tanker loading and unloading occurs on the concrete slabs or asphalt areas located to the east or west of the tank farm. Rail tanker loading and unloading occurs in the concrete secondary containment at the north end of the facility. Typical annual volumes are:

- Wastewater: 1 million gallons per year (GPY);
- Used Oil: 12 million GPY;
- Used oil filters: 96,000 GPY;
- Nonhazardous sludges: 500,000 GPY; and
- Petroleum contaminated materials, (i.e., absorbents, soils, sludges): 300 drums per year.

Oil and wastewaters are transferred from the tank farm area to the processing area via an overhead double walled piping system. All drum and sludge materials are handled within the 10,000 square feet (ft²) warehouse area or the SWMA. Absorbents and soils are



ATTACHMENT B-REVISED 05/01/12 FACILITY DETAIL PROCESS DESCRIPTION

consolidated from drums and will be placed into roll-off boxes at the SWMA for transportation to a permitted treatment or disposal facility. Solid waste is stored in the designated area of the warehouse. Solid waste is processed in the SWMA at the northwest corner of the facility. The facility has a fence surrounding the property to discourage unauthorized entry.

PROCESSING UNIT

Situated near the northeast comer of the site is the processing and oil dehydration system. The entire system area is in-doors with walls on all sides and a roof. The floor is constructed of 6-inch thick reinforced concrete. Concrete berms and sumps exist below the surface level of the foundation. All concrete is sealed. The composition or type of sealer is of epoxy construction. The containment berms are constructed of solid concrete and also are sealed to a height of 4 inches above floor level with the same type of sealer mentioned above. The roof cover is metal in this area. The area of the processing units is approximately 12,000 ft².

TANK FARM STORAGE AREA

Situated near the southwest corner of the subject site is the Main Tank Farm Storage Area (MTFSA). The storage area is out-of-doors and is walled on all sides. The floor is constructed of 8-inch thick, reinforced concrete. <u>Concrete berms and sumps exist below</u> the surface level of the foundation. All concrete is sealed. The composition or type of sealer is of epoxy construction. The containment walls are constructed of concrete masonry units with concrete filled cells. The containment walls are sealed to a height of 4-ft above floor level with the same type of sealer mentioned above. There is no roof cover. The area of the main tank farm is 7,500 (ft²).

Two additional tank-receiving areas were constructed during 2001-2002. The two additional storage tank areas were constructed north and south of the existing MTFSA. The construction was similar to the existing MTFSA. The area of the North Tank Farm is approximately 1,890 ft². The area of the South Tank Farm (STFA) is approximately 1,800 ft². The North and South Tank Farm secondary containment areas are connected to the Main Tank Farm Storage Area. A second area south of the South Tank Farm (STFA)



ATTACHMENT B-REVISED 05/01/12 FACILITY DETAIL PROCESS DESCRIPTION

was constructed in 2004. The Southern Tank Farm Area (SNTFA) covers approximately 2,448 ft². A new Used Oil/Industrial Wastewater Storage Area (UOIWWSA) covering 10,400 ft² was added in 2005 and started service January 19, 2007.

The MTFSA has 16 tanks (#'s 1-16), each with a capacity of 30,000 gallons for storage of finished product (used oil), and unprocessed used oil (used oil). Tanks 1-16 contain recycled fuel oil or used oil. The South Tank Farm (SFTA) has 3 tanks (#'s 17-19), each with a capacity of 20,000 gallons for receiving industrial wastewater. The South Tank Farm (STFA) also has a stormwater tank (#56) with a capacity of 14,100 gallons. The South Tank Farm (SFTA) also has a 1,100-gallon diesel fuel tank, which is Tank 57.

The North Tank Farm (NTF) has 5 tanks. Tanks 20, 21, and 23 are for storage of industrial wastewater and each have 20,000 gallons capacity. Tank 22 is for storage of used antifreeze and has a capacity of 20,000 gallons. Tank 55 is for storage of stormwater (not currently in use) and has 9,400 gallons capacity.

The Southern Tank Farm Area (SNFTA) has 8 tanks each with a capacity of 30,000 gallons. The tanks are numbered 24-31. These tanks are used to store used oil.

The UOIWWSA has 2 tanks, each with a capacity of 159,000 gallons. The tanks are numbered 53 and 54. Tank 53 is used to store used oil and Tank 54 (not currently in use) is used to store industrial wastewater.

DRUM/SLUDGE WAREHOUSE FACILITY

The bermed warehouse/drum storage area is approximately 10,000 ft² and is located along the south section of the processing plant. The chemical storage area is located within this zone and is situated within the above-mentioned containment. The area of the warehouse/drum storage unit and used oil filter transfer area is approximately 10,000 ft². Used oil filters will be transferred to roll-off boxes, at which time any used oil that has accumulated in the box will be collected and transferred to one of the used oil tanks for processing at the site. The roll-off box will then be transported to an off-site facility for processing/disposal.



SOLID WASTE MANAGEMENT AREA (SWMA)

The SWMA includes the area inside the south end of the warehouse (drum storage area) and the solidification area (northwest corner of the facility). Solid waste is stored in the south part of the warehouse for drum storage and taken to the solidification area for processing. Solid waste is processed by solidification in the SWMA located at the northwest corner of the facility. The SWMA is constructed of epoxy-sealed concrete with a sumped work area and a roof. A roll-off box is staged at the work area for storing processed solid waste. The solids processed by S-K are either generated onsite as a result of used oil processing and industrial wastewater transfer operations or they are received from offsite. The solidification agent and solids are mixed together to form a drier and more stable mixture.

Samples are collected for the required disposal or treatment analysis. Upon waste stream approval, the waste is loaded into trucks and shipped for disposal or treatment. Processed solids are shipped offsite in dump trailers, roll-off boxes, or drums. The processed solids are shipped to facilities that are permitted as thermal treatment facilities (F.A.C. 62-775) or Class I landfills (F.A.C. 62-701) by the Florida Department of Environmental Protection. Copies of the permits for the facilities that receive the solids are maintained on file at S-K.

At present the total number of employees at the site is 15. The office staff includes: one administrative, one Plant Manager, and one plant supervisor. The number of field personnel may vary according to scheduling and workloads.

PROCESS FLOW

Prior to scheduling a load to be received, S-K requires a specific amount of information be provided about the incoming waste stream. All non-hazardous waste streams proposed to be accepted at the facility are required to be reviewed and approved through the S-K system. In general a profile is submitted to the S-K tech center with information regarding the specific waste stream including MSDS's, generator process knowledge, and



any analytical data that may have been completed on that waste stream. This information is reviewed by a waste review chemist.

RECEIVING/PROCESSING AREA

The Aboveground Storage Tank Farms are out doors, fenced and/or walled on all sides. The floors are concrete with secondary containment. Concrete sumps exist below and concrete walls exist above the surface level of the foundation. All concrete is sealed.

The Main Tank Farm Storage Area (MTFSA) contains sixteen 30,000-gallon aboveground storage tanks (ASTs) located in a secondary containment area. The ASTs are used to receive used oil, processed marine diesel oil, processed dehydrated oil (DHO), petroleum contact water, industrial wastewater and virgin diesel fuel. The tank numbers are 1 through 16. The South Tank Farm (STFA) has three tanks (#'s 17-19), each with a capacity of 20,000 gallons for receiving industrial wastewater. The North Tank Farm (NTF) has four tanks, each with a capacity of 20,000 gallons for receiving Industrial Wastewater (#'s 20, 21, and 23), and tank #22 for storage of used antifreeze.

The Southern Tank Farm Area (SNTFA) has 8 tanks, each with a capacity of 30,000 gallons. The tanks are numbered (24 through 31) and are used to store used oil. The UOIWWSA contains two tanks, each with a capacity of 159,000 gallons. The tanks are numbered 53 and 54. Tank 53 stores used oil and Tank 54 (not currently in use) is used to store industrial wastewater.

Used oil is separated from water content by physical and/or chemical means. The wastewater is then transferred to a permitted offsite industrial wastewater pretreatment facility. A shaker or filter is used to separate solids from used oil. The remaining used oil is then further processed via chemical and physical means. Blending also occurs within this area. S-K personnel send all samples off-site for analyses.

INDUSTRIAL WASTEWATER STORAGE AREA

Location of the UOIWWSA is shown in Appendix B. UOIWWSA is comprised of two 159,000- gallon storage tanks, a loading/unloading area and transfer pumps



REBUTTABLE PRESUMPTION

S-K and/or any contracted used oil transporter will test all loads destined for the S-K facility for total halogens by testing a representative sample of the load using the Dexsil[®] Halogen Test Kit or its' functional equivalent. Any used oil which is found to demonstrate potential hazardous characteristics by testing greater than >1,000 parts per million (ppm) for total halogens and does not meet the rebuttable presumption will be handled as hazardous waste according to 40 CFR Parts 260 through 266, 268, 270, and 124.

S-K will handle hazardous waste by transporting it via a licensed hazardous waste transporter to a permitted RCRA Storage, Treatment, and Disposal Facility for proper storage, treatment, or disposal. S-K will store hazardous waste in proper containers that are closed except when adding or removing waste from the container.

The hazardous waste containers will be properly marked with the words "*HAZARDOUS WASTE*" and the accumulation start date. The hazardous waste containers will be inspected on a weekly basis. S-K used oil that tests greater than >1,000 ppm halogens will only be accepted if the generator has successfully rebutted the rebuttable presumption. Records of will be maintained by S-K for at least three years.

TRANSPORTATION

All used oil will be tested as described above. All used oil accepted by S-K vehicles will be delivered to the S-K facility for processing. S-K will comply with all U.S. Department of Transportation regulations as described in 49 CFR 100-199, which are applicable to S-K standard operation(s). Each S-K vehicle utilized for transporting used oil will contain a Transportation Contingency Plan, cellular/two-way radiophone, fire extinguisher, and Spill Containment Material (absorbent, booms, etc. All drivers will be trained as per S-K's *Used Oil Transporter Training Program* and as required by 40 CFR Part 112. If a spill occurs, S-K will take immediate action as described within the SPCC Plan and as required under 40 CFR Part 279.43 (2 through 5).



ATTACHMENT B-REVISED 05/01/12 FACILITY DETAIL PROCESS DESCRIPTION

The loading and unloading areas are located on the east and west sides of the Tank MTFSA for liquid wastes that arrive in tanker truck or vacuum truck. Three loading and unloading areas are located on the east side of the tank farm. One loading and unloading area is located on the west side of the Tank Farm. The loading and unloading areas sumped containment pad drain to a sump located along the Tank Farm containment wall at the midpoint. The west loading/unloading area has a sumped containment trench that runs the north, west, and south perimeter of the sumped containment pad.

The loading and unloading area for the warehouse is where containers of waste (used oil filters, non-hazardous solid wastes are accepted at the facility. These transfers occur at the entrance of the drum storage area bay door.

STORAGE TANKS

All tanks and/or containers implemented for used oil storage within the S-K facility meet the requirements of 40 CFR Parts 264 and 265 as applicable. All secondary containment meet the requirements of 40 CFR Part 279.45. All tanks and/or containers utilized for used oil storage, petroleum contact water, industrial wastewater storage, marine diesel oil, and virgin diesel fuel will be clearly labeled accordingly. S-K will address any spill, leak or other discharge as described within the current SPCC Plan (see Attachment F).

FACILITY STANDARDS

S-K will maintain an internal communications system consisting of: telephones, cellular phones, audible alarms and electrical alarms. Fire extinguishers (portable type) are located within the control booth and at each exit/entrance and every 50 linear feet. All facility equipment is tested and/or inspected regularly. Copies of inspection/testing documentation are provided in the SPCC Plan. Housekeeping is implemented as required by S-K personnel to ensure adequate aisle space for the unobstructed movement of spill personnel and equipment. All local authorities have received a copy of S-K's SPCC Plan and Contingency Plan.



SOLID WASTE GENERATED ONSITE

A written waste determination (profile) with supporting analytical information will be completed on each solid waste stream generated onsite each year. Solid waste streams generated on-site are as follows: tank/railcar sludges, shaker material, absorbent materials, and materials cleaned out of the used oil processing dehydrators. The expected maximum on-site storage of these materials at any one time is two (2) 20 yard roll-off boxes. Once the roll-off boxes are full they are covered and stored at the SWMA. The maximum time of on-site storage would be no longer than four (4) weeks although it is aniticipated that they would be removed sooner than this.

SOLID WASTE GENERATED OFFSITE

The Solid Waste Management Area (SWMA) includes the area inside the south end of the warehouse and the solidification area. Containerized solid waste is stored in south part of the warehouse (drum storage area). Solid waste is processed by solidification in the SWMA located at the northwest comer of the facility. The SWMA is constructed of sealed concrete with a sumped work area and a roof. A roll-off box is staged at the work area for storing processed solid waste prior to disposal.

S-K will accept and manage the following non-hazardous waste streams generated offsite: petroleum contaminated soil, petroleum contaminated sorbet materials, personal protective equipment, petroleum contaminated debris associated with a spill such as gravel, rock, concrete, asphalt and de minimus quantities of other petroleum contaminated solid wastes, petroleum tank bottom sludges from petroleum storage tank systems regulated pursuant to Chapter 62-761, F.A.C., non-regulated petroleum storage tank systems, pits, containment areas, sumps and tanks, petroleum contaminated water (PCW) as defined in Rule 62-740.030(1), F.A.C., petroleum contaminated sediments, sludges and liquids that originate from oil/water separators at residential car washes, rollover car washes, and tunnel car washes as defined in Rule 62-660.803(3), F.A.C., empty petroleum contaminated drums, pails, gas tanks, and fuel filters not otherwise constituting "used oil.



USED OIL PROCESSING

The initial step in the processing of used oil is to bring the hot gas generator up to operating temperature. The hot gas is used to operate the dehydrators and the processing unit. The used oil is initially pumped into the bottom tank which is a heat exchanger used to preheat the used oil and recover energy. The preheated used oil is stored in the day tank. The used oil is transferred to the dehydrator for the removal of water. The dehydrated used oil is stored in the dehydrated used oil tank. The dehydrated used oil is then transferred into the processing unit where the used oil is refined into smaller length hydrocarbon molecules. The marine diesel fuel is condensed using a selective fractional condensing unit. The light ends are condensed in the bottom tank and are transferred to the used oil light ends tank. The lights ends can be used for fuel to feed the hot gas generator. The marine diesel fuel is collected in two tanks. The marine diesel fuel is then pumped to the storage tanks in the tank farm. The processor can also be operated to produce dehydrated used oil that is not cracked. A secondary thermal oxidizing unit is provided to treat off-gases in the event of a flame-out condition in the hot gas generator. Figure 2 graphically illustrates the typical process flow of waste materials received and materials shipped from this facility.









ATTACHMENT C

USED OIL INCOMING AND OUTGOING SHIPMENT Revised 05/01/12



USED OIL INCOMING AND OUTGOING SHIPMENTS

PURPOSE/SCOPE

This analysis plan is designed to satisfy the requirements of 40 CFR 279.53 and 279.72 as specified in 40 CFR 279.55. This procedure outlines the decision making processes used in determining the disposition of any individual load of used oil analyzed in anticipation for acceptance into the Safety-Kleen Systems, Inc. (S-K) system, for resale or processing prior to resale. This plan is augmented by Attachments C-1 and C-2, which describe S-K Used Oil Criteria and Oil and Antifreeze Collection procedures, respectively.

SAMPLING PLAN

The S-K sampling method complies with ASTM D-4057 and the requirements of 40 CFR 261 Appendix 1. Sampling is conducted in the container specific procedures described therein and incorporated in subsequent test methods. Sampling equipment and methods vary between individual locations. S-K uses sample cocks, tank taps, coliwasa, and extended-tube sampling that comply with the approved methods for sampling petroleum products. Random sampling per ASTM D-4057 and SW-846 is used for determination of frequency for sample lots. Sample containers used to contain sample media are either glass or plastic bottles as outlined in the above-referenced standards.

SAMPLING INTERVALS AND FREQUENCY

A Retain sample is taken from each container at each new and existing customer location before pumping a load of used oil. The S-K representative will use the TIF Halogen detector to screen the sample for halogenated constituents. If the TIF indicates the presence of halogenated materials by alarming, the S-K representative will verify, with the assistance of the S-K facility manager and/or Environmental Health and Safety Manager, if the customer is a Public Collection Center (DIY collection center) or a Conditionally Exempt Small Quantity Generator (CESQG) of hazardous waste. If this information is verified the S-K representative will document the load failed and proceed to collect the used oil. If the customer is found to be a Small Quantity Generator (SQG)



or Large Quantity Generator (LQG) of hazardous waste the S-K representative will perform $Dexil^{(0)}$ Chlor-D-Tect analysis on the retain sample. If this analysis finds the oil to be >1,000 ppm halogens the S-K representative will inform the customer and will not collect the used oil. A representative sample of the used oil would then need to be sent to a laboratory for rebuttable presumption analysis.

S-K has three used oil collection procedures depending on the type of customer generating the used oil. They are defined as follows:

Automotive Categories – Body shops, auto maintenance, fleet, dealership, dealership – heavy equipment – RV, fleet – utility, quick lube, auto retail, other – auto, government, K-12 & vocational, military.

Used oil generated at the above facilities is collected after the material passes field testing procedures including the TIF Halogen Detector and if necessary Dexsil® Chlor-D-Tect analysis.

Non-Automotive Categories – Metal fabrication, printing & packaging, chemical manufacturing, other – industrial, metal working, natural resources, dry cleaning, other – specialty, higher education & medical, and construction.

Used oil generated at the above facilities are required to have a representative sample of their used oil sent to the S-K Tech Center for analysis (Pre-qualification) and approval for Safety-Kleen Oil Services (SKOS) before pick up. There the oil is analyzed for:

-Density, Flammability at 140F, 200F, and 73F, Non-Volatile Residue, pH, Viscosity,

Water Content, Phase (% Organic, % Aqueous, % Solid, % Sludge), Caustic Coagulation,

Metals, Ash Content, Heat Content (BTU Value), VOC, HVOC, PCB.

If the used oil is approved for SKOS then prior to each pick up at the particular customer location the load is field tested with the TIF Halogen Detector and if necessary the Dexsil® Chlor-D-Tect kit.

High Risk Sources – Electrical service, repair, and utility facilities, non-automotive used oil stored in drums, scrap yards/junk yards, sewage treatment plants, third party oil collectors, dismantling of an old plant, source or generator is unknown, generators with used oil/antifreeze that contain detectable levels of PCBs (2 ppm or greater), generators that have previously been identified as being high risk waste generators.



Use oil generated at the above facilities are required to have a representative sample of their material sent to the S-K Tech Center and analyzed for the same constituents as non-automotive categories before pick up. After that a representative sample is required to be taken and sent for PCB and Silicon analysis prior to each collection. In addition, field testing is performed with the TIF Halogen Detector and if necessary Dexsil® Chlor-D-Tect Kit.

If the customer sample passes field screening methods, the S-K representative will mark the field screening sections appropriately on the shipping paper and if necessary, use the service agreement to document price structures and frequency of collection. The collection of the used oil then proceeds and the customer becomes a certified account. All information is forwarded to the customer service department to establish the new account. It is at the discretion of the S-K representative to either approve the field methodology for the customer or to sample the customer's used oil and send it to the laboratory to have pre-qualification analyses completed. If the S-K representative decides to utilize the laboratory testing procedure, the customer's used oil may not be collected until the laboratory results have been recorded. For current or prior customers from whom S-K has not collected used oil during a 12-month period, S-K will re-certify them under this process before a used oil collection is made. A customer who has generated used oil that has contaminated S-K tanks or tankers is re-certified also before routine collections resume. Subsequently, each time a driver picks up used oil from a certified customer, they use a TIF Halogen detector (sniffer) as a screening device to detect the presence of contaminants.

If the detector alarm sounds, possibly indicating that a hazardous waste has been mixed into the used oil, the driver does not load the fluid unless a determination has been made with the assistance of the S-K Facility Manager and/or Environmental Health and Safety Manager that the customer is a CESQG or Public Collection Center. For SQGs & LQGs the failure of the TIF Halogen Detector is required to be confirmed with the Dexsil® Chlor-D-Tect Kit.



All used oil loads received at the facility are required to have a representative retain sample taken from the vessel holding the material and analyzed with the Dexsil® Chlor-D-Tect Kit before off-loading into holding tanks. These retain samples are held at the S-K facility until the outbound sample clears laboratory testing. If the facility utilizes transfer tanks, then each is sampled and retained at the facility until the outbound tank clears. Contents of the transfer tanks may be transferred to and commingled with the contents of other transfer tanks into outbound tanks.

In some cases, S-K leases railcars for transportation purposes. Once the railcar is loaded, the facility pulls a sample or composite retain sample (i.e. the railcar is equivalent to an outbound tank). The outbound sample is taken from each batch (outbound tank/tanker or railcar) and analyzed to ensure that the used oil can be marketed as on-specification used oil fuel in accordance with 40 CFR 279.11 and 279.72, and also to provide the purchasing customer with the physical properties of the fluid.

RECORDS RETENTION

S-K retains records and results of the used oil analysis and hazardous waste determinations (if applicable) described in the written analysis plan for a minimum of three years.

METHODS OF ANALYISIS

S-K uses their laboratory for most used oil analysis as described in this plan. However, on some occasions an outside laboratory may be used for rebuttable presumption studies and/or for verification of results through quality control studies. The methods used by the S-K Laboratory to determine the properties of the fluids at the various points in the process are as follows by type of sample:

Certification Samples:

Ignitability	EPA SW846-10 10
Water	ASTM D-1744
Arsenic	EPA SW846-6010
Cadmium	EPA SW846-60 10



Chromium	EPA SW846-6010
Lead	EPA SW846-60 10
Total Chlorine (Halogens)	EPA SW846-9075
Sulfur	EPA SW846-9075
PCB	EPA SW846-8082

Check Samples:

Ignitability	EP A SW846-1010 Total
Chlorine (Halogens)	EPA SW846-9075

Outbound Samples:

Ignitability	EPA SW846-101O
Water	ASTM D-I744
Arsenic	EPA SW846-6010
Cadmium	EPA SW846-6010
Chromium	EPA SW846-6010
Lead	EPA SW846-60 10
Total Chlorine (Halogens).	EPA SW846-9075
Sulfur	EPA SW846-9075
PCB	EPA SW846-8082
Total Ash	ASTM D-482
Viscosity	ASTM D-445
API Gravity	ASTM D-1298 or D-4052
Water by BS&W	ASTM D-1796
Sediment by BS&W	ASTM D-1796

When samples are sent to outside laboratories for analysis of halogenated hazardous constituents for Rebuttable Presumption purpose, laboratory methods are as follows:

Volatile Organic CompoundsEPA SW846-8260B By GC/MS Semi Volatile Organic Compounds ... EPA SW 846-8270C By GC/MS

REBUTTABLE PRESUMPTION

To satisfy the Rebuttable Presumption requirements of 40 CFR 279.53, if a tank, tanker truck, or container of used oil is sampled, analyzed, and found to exceed 1,000 ppm total Halogens, the following procedures are used:

In the event that sufficient knowledge of the source of the used oil is available to ascertain that halogenated hazardous waste has not been added to the used oil, then S-K documents this knowledge and keeps the documentation on file at the facility, and uses it



as the basis to rebut the presumption that the used oil contains significant concentrations of hazardous halogenated waste. Knowledge of the source or process is gained through customer certification, periodic recertification, site visits, and/or customer analysis of samples.

Used oil received from a public collection program that does not receive waste from businesses can have the waste determination documented by a statement from the generator. Waste determinations from businesses require that generators use "product" or "process" knowledge with appropriate documentation. "Process knowledge" could constitute acceptable knowledge when detailed information on the wastes is obtained from existing published or documented waste analysis data or studies conducted on waste streams generated by processes similar to that which generated the waste.

Acceptable knowledge of a waste stream is relied upon when:

- S-K is familiar with the generator processes by site visits, sampling data and other information if needed;
- Waste analysis data contained in documented studies from the generator must be based on valid sampling and analytical techniques as documented in the attached S-K Waste Material Profile Form (see Attachment C-1).
- Process description and documented studies from the generator are reviewed to determine if any differences exist between the processes described in the studies and those actually employed by the generator.

If sufficient generator knowledge is not available to rebut the presumption, then laboratory analyses is performed and documented to determine if significant concentrations of hazardous halogenated constituents are present in the used oil. These analyses are EPA SW846-8260B Volatile Organic Compounds by GC/MS, and EPA SW846-8270C Semi-volatile Organic Compounds by GC/MS. Acceptance of used oil containing greater than 1,000 ppm of a halogenated hazardous constituent listed in Appendix VIII is determined by S-K on a case-by-case basis; but in no case will used oil be accepted with analytical results showing a halogenated hazardous Appendix· VIII constituent present at a concentration of 1,000 ppm or greater (Ref. 50 FR 49176-49177



regarding use of the rebuttable presumption and the evaluation of "significant levels" of halogenated hazardous constituents). If found to be rebuttable, S-K directs the used oil into the on-specification fuel oil or used oil processing streams only if total Halogens are below 4,000 ppm. However, if the used oil is determined to contain significant concentrations of halogenated hazardous constituents, S-K handles it as hazardous waste in accordance with 40 CFR Part 262.

In all cases in which the presumption is to be rebutted, a S-K senior official or a designated representative approves all final determinations.

DETERMINATION OF USED OIL SPECIFICATIONS

If the used oil is analyzed and found to be outside the specification tolerances for parameters other than Halogens, as listed in 40 CFR 279.11, the used oil is handled in accordance with applicable regulations. In the case of detectable PCB concentrations, as listed in 40 CFR 761.20(e), the provisions of 40 CFR 761.1(b)(5) and 40 CFR parts 261 and 279 are complied with. On all occasions when a load of used oil exceeds on-specification requirements in accordance with 40 CFR 279.11, a review of all contributors to that load is conducted to determine the source of the nonconforming load.

S-K Used Oil Classification

Safety-Kleen classifies the used oil it picks up and accepts into three categories:

Automotive – Used oil is considered automotive if it is derived from the maintenance of internal combustion engines and from one of the following generators; body shop, auto maintenance, fleet, dealership, dealership (heavy equipment, RV), fleet (utility), quick lube, auto retail, other (auto), government, K-12 & vocational, and military. Use oil collected and accepted from this category is field tested with the TIF Halogen Detector before pick up at every stop. If the material fails the halogen screening a Dexsil® Chlor-D-Tect analysis is performed on the material. If the material fails the Chlor-D-Tect analysis then it will not be accepted if the generator is a small quantity generator (SQG) or large quantity generator (LQG) of hazardous waste until rebuttal analysis is completed and can be reviewed.



Non-Automotive – Used oil is considered non-automotive if it comes from one of the following generators; metal fabrication, printing & packaging, chemical manufacturing, other (industrial), metal working, natural resources, dry cleaning, other (specialty), higher education & medical, and construction. Used oil collected and accepted from this category is required to be sampled and undergo pre-qualification analysis before the initial collection. Once the used oil has been analyzed and is deemed to be acceptable it may be picked up and the procedures regarding field testing (halogen screening, Chlor-D-Tect, etc.) are the same as for an automotive generator.

High Risk Sources – Use oil is considered high risk if it is generated from, but not limited to the following sources; electrical service, repair, and utility facilities, all non-automotive used oil stored in drums, generators that have previously been identified as being high risk, generators with used oil that contain detectable levels of PCBs (2 ppm or greater), generators whose used oil has failed the Dexsil Chlor-D-Tect test, Do-It-Yourself'' (DIY) storage tank/container sites that have no controlled access, scrap yards/junk yards, sewage treatment plants, third party used oil collectors, dismantling of old plant, source of generator is unknown, used oil that exhibits unusual characteristics. Used oil collected and accepted from this category is required to be sampled and undergo pre-qualification analysis before the initial collection. Thereafter, PCB and Silicon analyses must be performed on subsequent pick-ups before collection. Once the used oil has been analyzed and is deemed to be acceptable it may be picked up and the procedures regarding field testing (halogen screening, Chlor-D-tect, etc.) are the same as above.

Use oil retain samples are collected at each generator location at the time of service for all categories of generators. In addition, the S-K Ocala facility takes a representative sample of all incoming used oil shipments and analyzes the material for chlorine, halogens, and sulfur using an XRF instrument, and or Dexsil Chlor-D-Tect kit before releasing the load for processing into the plant. In the event that any load fails the truck or tank will be locked down and a representative sample of the load will be sent to a laboratory for rebuttal analysis. In addition the retain samples associated with the specific load will be sent to the S-K East Chicago Laboratory to determine the source of contamination. Upon analytical results any load of used oil that is considered to be a hazardous waste will be properly managed as such.



A significant number of incidents of nonconforming loads by that customer will lead to a review of the customer's procedures and operations to determine if a change has led to the introduction of hazardous waste into the used oil stream. The term "significant number" is a subjective distinction determined by S-K generator knowledge, frequency of pick-up and number of loads over a given time frame, percentage of the total of customers used oil flow that exceeds on-specification requirements, and other factors that may be relevant to the case at hand.

ANALYSIS PLAN REVIEW

The plan is reviewed periodically or whenever necessary to reflect new or modified tasks, procedures, and processes, which affect the items in this analysis plan.



B. NONHAZARDOUS WASTE STREAMS

Prior to acceptance of a non-hazardous waste stream Safety-Kleen requires the generator to complete a waste material profile. The material profile may be based on "generator process knowledge", and or supporting analytical information. The material profile and any supporting information are then submitted to the Safety-Kleen Tech Center for review by a waste review chemist for final approval before acceptance. If, after review by the S-K Tech Center, the material requires analysis this will be done in accordance with 40 CFR Part 261 Subpart C. Additional parameters may be used in the waste determination on a case by case basis from the TCLP individual parameters found in the volatiles, semivolatiles, herbicides or pesticides groupings. Appropriate sampling and analytical methods are used and the analysis will be performed by a state-certified laboratory.

GENERATED WASTES

Waste sludge generated by S-K processes is tested yearly for a hazardous waste determination in accordance with 40 CPR Part 261 Subpart C as follows:

<u>Parameter</u>	<u>Method No.</u>	<u>Allowable Limit</u>
TCLP Arsenic	1311/7060	5.0 mg/L
TCLP Barium	1311/7080	100.0 mg/L
TCLP Cadmium	1311/7131	1.0 mg/L
TCLP Chromium	1311/7191	5.0 mg/L
TCLP Lead	1311/7421	5.0 mg/L
TCLP Mercury	1311/7471	0.2 mg/L
TCLP Selenium	1311/7740	1.0 mg/L
TCLP Silver	1311/7761	5.0 mg/L
TCLP Volatiles	1311/624/8260	Refer to 40 CFR 261.24
TCLP Semivolatiles	1311/625/8270	Refer to 40 CFR 261.24
TCLP Pesticides	1311/608/8081	Refer to 40 CFR 261.24
TCLP Herbicides	1311/615/8321	Refer to 40 CFR 261.24

The solid waste streams generated onsite are sampled and analyzed once a year to make a waste determination in accordance with 40 CPR 262. All outgoing hazardous wastes are transported by a licensed hazardous waste transporter. Designated disposal facilities are RCRA approved.

All analyses are requested via S-K's Chain-of-Custody (COC) document. Each sample submitted for analyses is recorded on S-K's Sample Receiving Log. All analytical results



are recorded in S-K's computer database and hard copies are provided for generator files. The facility is a Conditionally Exempt Small Quantity Generator that produces less than 100 kilograms per month of hazardous waste.



C. SOLID WASTE RECEIVED FROM OFF SITE

Solid waste streams received from offsite are profiled into the facility. Only non-hazardous waste is accepted by S-K Ocala. The generator is required to make a non-hazardous waste determination based upon generator process knowledge or analytical information or both for the waste to be processed by S-K. "Process knowledge" could constitute acceptable knowledge when detailed information on the wastes is obtained from existing published or documented waste analysis data or studies conducted on waste streams generated by processes similar to that which generated the waste. If analytical data is available on the waste stream the information in Table C-1 is used to determine if a waste is a characteristic hazardous waste.



Table C-1. Constituents That Will Be Used to Prescreen Solid Waste Generated Offsite for a Non-Hazardous Waste Determination.

CONSTITUENT/PROPERTY	ACCEPTABLE LIMIT	METHOD
Chlorobenzene	below 100.0 ppm	EPA 1,311/8021
Chloroform	below 6.0 ppm	EPA 1311/8021
1,2-Dichloroethane	below 0.5 ppm	EPA 1311/8021
1,1-Dichloroethylene	below 0.7 ppm	EPA 1311/8021
Methyl Ethyl Ketone	below 200.0 ppm	EPA 1311/8021
Tetrachloroethylene	below 0.7 ppm	EPA 1311/8021
Trichloroethylene	below 0.5 ppm	EPA 1311/8021
Vinyl Chloride	below 0.2 ppm	EPA 1311/8021
TCLP SEMIVOLATILES		EPA 1311/8270/625
1,4-Dichlorobenzene	below 7.5 ppm	EPA 1311/8270
2,4,5-Trichlorophenol	below 400.0 ppm	EPA 1311/8270
2,4,6-Trichlorophenol	below 2.0 ppm	EPA 1311/8270
2,4-Dinitrotoluene	below 0.13 ppm	EPA 1311/8270
Cresols	below 200.0 ppm	EPA 1311/8270
Hexachloro-1,3 butadiene	below 0.50 ppm	EPA 1311/8270
Hexachlorobenzene	below 0.13 ppm	EPA 1311/8270
Hexachloroethane	below 3.0 ppm	EPA 1311/8270
Nitrobenzene	below 2.0 ppm	EPA 1311/8270
Pentachlorophenol	below 100.0 ppm	EPA 1311/8270
Pyridine	below 5.0 ppm	EPA 1311/8270
TCLP PESTICIDES		EPA 1311/8081/608
Chlordane	below 0.030 ppm	EPA 1311/8081/608
Endrin	below 0.020 ppm	EPA 1311/8081/608
Gamma-BHC	below 0.40 ppm	EPA 1311/8081/608
Heptachlor	below 0.0080 ppm	EPA 1311/8081/608
Heptachlor Epoxide	below 0.0080 ppm	EPA 1311/8081/608
Methoxychlor	below 10.0 ppm	EPA 1311/8081/608
Toxaphene	below 0.50 ppm	EPA 1311/8081/608
TCLP HERBICIDES		EPA 1311/8321/615
2,4,5-TP(Silvex)	below 1.0 ppm	EPA 1311/8321/615
2,4,D	below 10.0 ppm	EPA 1311/8321/615
Flashpoint	Over 140° F	EPA 1010



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

SAMPLING

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

ANALYSIS

Outgoing shipments are divided into two categories:

- Shipments requiring thermal treatment.
- Shipments requiring landfill.

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

<u>Thermal Treatment</u>:

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

Landfill:

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



ATTACHMENT C-1

USED OIL CRITERIA AND RELATED FORMS



ATTACHMENT C-2

OIL AND ANTIFREEZE COLLECTION PROCEDURES










ATTACHMENT D

SLUDGE, RESIDUE, AND BY-PRODUCT MANAGEMENT DESCRIPTION Revised 05/01/12



GENERATED WASTES

The Waste Sludge is removed from individual tanks a minimum of once every five years. Waste sludge generated by S-K processes is tested yearly for a hazardous waste determination in accordance with 40 CFR Part 261 Subpart C. Any waste sludge generated by S-K processes is tested for a hazardous waste determination on an annual basis in accordance with 40 CFR part 261 Subpart C as follows, by the following table:

	Parameter	Method No.	Allowable Limit
	TCLP Arsenic	1311/7060/6010	5.0 mg/l
	TCLP Barium	1311/7080/6010	100.0 mg/1
	TCLP Cadmium	1311/7131/6010	1.0 mg/l
	TCLP Chromium	1311/7191/6010	5.0 mg/l
	TCLP Lead	1311/7421/6010	5.0 mg/l
	TCLP Mercury	1311/7471	0.2 mg/l
	TCLP Selenium	1311/7740/6010	1.0 mg/l
Ż	TCLP Silver	1311/7761/6010	5.0 mg/l
	TCLP Volatiles	1311/624/8260	Refer to 40 CFR 261.24
	TCLP Semivolatiles	1311/625/8270	Refer to 40 CFR 261.24
	TCLP Pesticides	1311/608/8081	Refer to 40 CFR 261.24
	TCLP Herbicides	1311/615/8321	Refer to 40 CFR 261.24
	Flash Point	1010	>140° F

If any materials are found to be hazardous wastes then they are transported by a *licensed hazardous waste transporter*. Designated disposal facilities are Resource Conservation and Recovery Act approved. Hazardous waste is stored in the secondary containment area of the warehouse (drum storage area), if any is generated. The hazardous waste will be inspected weekly, if any is generated during the life of the facility (See attached Hazardous and NonHazardous Waste Weekly Inspection Record forms [2]). All analyses will be requested via S-K's Chain of Custody (COC) Document. Each sample submitted for analysis will be recorded in SK's computer database and hard copies will be provided for generator files. S-K personnel who have been trained in confined space entry will complete the sludge and residues removal work in the facility tanks. The S-K tank monitor will be trained for CPR, first aid and confined space rescue unless the local fire department is used for rescue support.

ATTACHMENT E

FACILITY USED OIL TRACKING PLAN Revised 05/01/12



FACILITY USED OIL TRACKING PLAN

INTRODUCTION

This management procedure covers the tracking requirements of Title 40 Code of Federal Regulations (CFR) Parts 279.56. Safety-Kleen Systems, Inc. (S-K) will conduct business in accordance with this tracking plan when shipping or receiving used oil. Copies of the various forms used by S-K related to the implementation of this plan are also enclosed.

DESCRIPTION

The S-K used oil shipment documents are to be retained for at least three years. These documents include the information as stated in 40 CFR Part 279.56. (See used oil shipment documents provided in Attachment E-1). These documents contain the required regulatory information in accordance with 40 CFR Part 279.56 as follows:

- Name and address of transporter who delivered the used oil to the processor/rerefiner;
- The name and address of the generator or processor/re-refiner from whom the used oil was sent for processing/re-refining;
- The EPA identification number of the transporter who delivered the used oil to the processor/re-refiner;
- The EPA identification number (if applicable) of the generator or processor/rerefiner from whom the used oil was sent for processing/re-refining;
- The quantity of used oil accepted; and
- The date of acceptance.

The tank that each tanker load is placed into is recorded on the S-K Incoming Used Oil Shipment Log. Loads that are to be rejected will be done so prior to off-loading the used oil. The S-K used oil processing facility will keep a record of each incoming used oil shipment accepted for processing. (A copy of the used oil shipping document form is



ATTACHMENT E-REVISED 05/01/12 FACILITY USED OIL TRACKING PLAN

provided.) The main record form will be the S-K Facility Operating Log. This log contains the following information:

- Date used oil load received;
- Container number;
- Generator name and EPA ID number (if applicable);
- Inbound manifest number;
- Date shipped;
- Outbound manifest;
- Outbound location;
- Quantity of used oil accepted; and
- Container type.

The S-K used oil processing facility maintains a record of each outgoing used oil shipment that is sent to a used oil burner, processor/re-refiner or disposal facility. The record will be the S-K Outgoing Used Oil Shipment document. The processed fuel will be placed into a tank until it is full or the production run is finished. Upon sampling the contents of the tank, no further used oil will be added to the tank. The processed fuel tank will be sampled and analyzed in accordance with the waste analysis plan. The analytical results kept on hand at the facility and also provided to the customer. A copy of a typical shipping document is provided in Attachment E-1. This document contains the following information:

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



ATTACHMENT E-REVISED 05/01/12 FACILITY USED OIL TRACKING PLAN

SK operates under EPA ID number FLR000060301. All shipments will be tracked via a uniform manifesting system. At a minimum, the information contained within the tracking system will include the following:

- Acceptance Documentation
- Profile Documentation
- Generator Information As Required Under 40 CFR Part 279.46
- Transporter Information As Required Under 40 CFR Part 279.46
- Facility Information As Required Under 40 CFR Part 279.46

All manifesting system documents will be maintained for at least three (3) years.

OPERATING REPORTS

S-K will complete and forward an Annual Report by Used Oil and Used Oil Filter Handlers on DEP Form 62-710.901(3) as required by Chapter 62-710.510(5), F.A.C. no later than March 1 of each year.



ATTACHMENT E-1

USED OIL TRACKING FORMS

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ATTACHMENT E-2

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TRANSPORTER COMP.	ANY NAME ADDRESS			USEF	A ID NUMBER
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ahipping facility identified t	the used oil. Documantation supporting the above above.	a statements may be found in the files of the	evaluable at the shipping facilities.		
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×	SHIPPER'S INITI	ALS		SHIPPER'S IND	TIALS
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CERTIFICATION CARGE					
SHIPPER'S CERTIFICAT	TON: I hereby declare that the conten	ta of this consignment are fully and	d accurately described above b	y proper shipping na	me and are classified,
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Sales Name: Employee #:		n Email		LOB	#: []	19 <u>1</u> 20 1
A. CUSTOMER INFORMATION				eck if Billing Same		
Generator			Billing Compar	ay		
Facility Address (No P.O. Box)			Billing Address	·		
			City/State/Zip	·····		
City/State/Zip			Billing Contact			
Technical Contact			Phone		FAX	
Phone FAX			Email	··· · · · · · · · · · ·		
	QG EPA II)#		State ID#	۰ ــــــــــــــــــــــــــــــــــــ	
B. SHIPPING INFORMATION US DOT Shipping Name						
Hazardous Class/Division # UN	/NA #		Packing Gm		RO	
Size Container Type			Quantity	Erequency		
C. GENERAL MATERIAL & REGULATORY INFORM	ATION				······································	
Name of Material						
Process Generating the Material					······································	
Yes No		Yes	No			
Regulated or Licensed Radioactive Waste			Contains UH	ICs/Constituents of Concer	n: List in section D	
Regulated Medical/Infectious Waste			Exempt Was	te: If yes, list ref. 40 CFR		
Waste Subject to Benzene NESHAP regulation	ns		dioxin-listed	wastes with F020-F023 or	F027 waste codes?	m,
TSCA Regulated PCB Waste: List PCB level	in section D		State Hazard	ous Waste: List Codes		
Regulated Ozone Depleting Substance			EPA Hazardo	ous Waste: List Codes		
CERCLA Regulated (Superfund) Waste		Source	Code G For	m Code W Mgt. M	ethod H	
D. MATERIAL COMPOSITION (Range Total > or =	100%) or ppm		. REACTIVE CHA	ARACTERITSTICS	Yes No Oxio	lizer
	100]]	es 🗍 No 🗍 React.	Sulfides ppn	n Yes 🗍 No 🗌 Shoo	k/Explosive
			es No React.	Cyanides ppn	n Yes No Poly	merizable
······································			es No Water//	Air (Pyrophoric) React.	Yes No Othe	x-Comments
			Elemental Const	t ituents (ppm):		
			🔲 No detectable E	Elements Sb	As Ba	
		III	e Cd	Cr	_ Pb Hg	
	L	1	i Se	Ag	_ TI V	
	ļ		etals Data based on	: TCLP Total Analys	is Generator Knowle	dge (no testing)
	ļ	I	. PHYSICAL CHA	RACTERISTICS		
		F	lash Point:	°F (if <73°F)	pH Range:	□ <u>≤</u> 2
]73-<100] 100-141	□ >2-4	□ >4-10
] 142-<200] <u>≥</u> 200	>10-<12.5	<u>⊇≥</u> 12.5
		#	Phases	% Liquid	Viscosity cps	
MSDS Attached Total:		9	Sludge	% Solid	% Halogens]
		E	TU's/lb:	Specific Gravity:	; 	
G. COMMENTS			<u>-</u>		·····	
I hereby certify that I am an authorized agent of the generator.	and warrant on	behalf o	the generator that the	he information supplied on	this form and on any a	ttachments or
supplements hereto is complete and accurate, and that all kno	wn or suspected	i hazard	of the material(s)	described herein have been	disclosed. I agree that	it if there is a
accordance with the terms and conditions of the contract bety	upplied on this ween Safety-Kle	form, the en and t	t either Safety-Klee he generator: that the	n or the generator may init his profile certification ma	iate further testing and v be amended according	evaluation in rely: and that
additional expenses incurred by Safety-Kleen in order to ma	anage the wast	e in acc	ordance with Federa	al, State, and Local regul	atory requirements will	l be the sole
responsionity of the generator, including the return of the materi Generator Signature:	iai to the genera	tor at get	crator's expense.		Data	
				·····		

ATTACHMENT F

FACILITY PREPAREDNESS AND PRESENTATION PLAN Revised 05/01/12

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1.0 CERTIFICATIONS AND MANAGEMENT APPROVAL

1.1 PROFESSIONAL ENGINEER'S CERTIFICATION (112.3[d])

I hereby certify that I am familiar with the requirements of Chapter 40, Part 112, Code of Federal Regulations (CFR), and that I have visited the Safety-Kleen System, Inc. (S-K), facility, located at 359 Cypress Road in Ocala, Florida. I also certify that this Spill Prevention, Control, and Countermeasure (SPCC) plan has been prepared in accordance with good engineering practices, including consideration of applicable industry standards, and with the requirements of 40 CFR 112. Furthermore, I certify that procedures for required inspections and testing have been established and that this SPCC Plan is adequate for the facility.

Such certification shall in no way relieve S-K of the duty to prepare and fully implement this SPCC Plan in accordance with the requirements of 40 CFR 112.

By:_

Mario E. Farrulla, P.E. Florida P.E. No. 55168

Date:_____

Table 1-1 provides a detailed listing of the professional engineer certifications for this SPCC Plan.

Table 1-1. SPCC Plan Certifications

Certification Number	Ву	Date	Description
1	Mario E. Farrulla, P.E.	October 18, 2011	Original plan





1.2 DOCUMENTATION OF PLAN REVIEW AND EVALUATION (112.5)

Appendix A provides tables suitable for tracking periodic review and evaluation of this SPCC Plan.

1.3 MANAGEMENT APPROVAL (112.7)

S-K is committed to the prevention of discharges of oil to navigable waters and the environment from their facility located at 359 Cypress Road in Ocala, Florida. As a part of this commitment, S-K will provide the necessary resources to fully implement this SPCC Plan. S-K will maintain the highest standards for discharge prevention, control, and countermeasures through regular review, updating, and implementation of this SPCC Plan.

By:_

Darwin "Troy" Robinson Depot Manager Safety-Kleen Systems, Inc.

Date:



1.4 <u>CERTIFICATION OF THE APPLICABILITY OF THE SUBSTANTIAL</u> <u>HARM CRITERIA (ATTACHMENT C-II, APPENDIX C, 40 CFR 112)</u>

THE SUBSTANTIAL HARM CRITERIA

- 1. Does the facility transfer oil over water to or from vessels and does the facility have a total oil storage capacity greater than or equal to 42,000-gallons? Yes No
- 2. Does the facility have a total oil storage capacity greater than or equal to 1 million gallons and does the facility lack secondary containment that is sufficiently large to contain the capacity of the largest aboveground oil storage tank plus sufficient freeboard to allow for precipitation within any aboveground oil storage tank area?
- 3. Does the facility have a total oil storage capacity greater than or equal to 1 million gallons and is the facility located at a distance (as calculated using the appropriate formula in Attachment C-III to Appendix C to 40 CFR 112 or a comparable formula1) such that a discharge from the facility could cause injury to fish and wildlife and sensitive environments? For further description of fish and wildlife and sensitive environments, see Appendices I, II, and III to DOC/NOAA's "Guidance for Facility and Vessel Response Plans: Fish and Wildlife and Sensitive Environments" (see Appendix E to 40 CFR 112, Section 13, for availability and the applicable Area Contingency Plan. □ Yes ⊠ No
- 4. Does the facility have a total oil storage capacity greater than or equal to 1 million gallons and is the facility located at a distance (as calculated using the appropriate formula in Attachment C-III to Appendix C to 40 CFR 112 or a comparable formula) such that a discharge from the facility would shut down a public drinking water intake? Yes X No
- 5. Does the facility have a total oil storage capacity greater than or equal to 1 million gallons and has the facility experienced a reportable oil discharge in an amount greater than or equal to 10,000-gallons within the last 5 years?

Certification

I certify, under penalty of law, that I have personally examined and am familiar with the information submitted in this document, and that based on my inquiry of those individuals responsible for obtaining this information, I believe that the submitted information is true, accurate, and complete.

By:

Date:

Darwin "Troy" Robinson Depot Manager, Safety-Kleen Systems, Inc.



2.0 INTRODUCTION

Section 311(j)(1)(C) of the Clean Water Act requires the development of regulations to establish procedures, methods, equipment, and other requirements to prevent discharges of oil from vessels and facilities, and to contain such discharges should they occur. These regulations were promulgated by the U.S. Environmental Protection Agency (EPA) and are found in 40 CFR 112, Oil Pollution Prevention. The preparation and implementation of a Spill Prevention, Control, and Countermeasure (SPCC) plan is required, when applicable, to address the prevention of discharges of oil. 40 CFR 112.2 defines an SPCC Plan as "the document required by 112.3 that details the equipment, workforce, procedures, and steps to prevent, control, and provide adequate countermeasures to a discharge."

S-K must prepare and implement an SPCC Plan because the facility meets the requirements listed in 40 CFR 112 (refer to Section 2.2.1).

2.1 PLAN REVIEW AND AMENDMENT (112.5)

2.1.1 PLAN AMENDMENTS AND P.E. CERTIFICATION OF AMEND-MENTS (112.5[a][c])

This SPCC Plan must be amended when there is a change in the facility's design, construction, operation, or maintenance that materially affects the facility's potential for the discharge of oil into or upon the navigable waters of the United States or adjoining shorelines. The amendment must be completed within six months and implemented as soon as possible, but in no case later than six months following the preparation of the amendment.

An amendment to the Plan can either be technical in nature, which requires a Professional Engineer's certification, or non-technical (administrative) in nature, which does not require Professional Engineer certification. Technical amendments materially affect a facility's potential to discharge oil and require the application of good engineering practice. Hence, these types of changes require a Professional Engineer's certification.



Records of both technical and non-technical amendments will be maintained in Appendix A. If it cannot be determined whether an amendment is technical or non-technical, the change will be reviewed by a Professional Engineer.

2.1.2 PERIODIC REVIEW AND EVALUATION (112.5[b])

A review and evaluation of this Plan must be conducted at least once every five years from the original date of certification. As a result of this review and evaluation, the Plan must be amended within six months of the review to include more effective prevention and control technology, if the technology has been field-proven at the time of review and will significantly reduce the likelihood of a discharge of oil into or upon the navigable waters of the United States or adjoining shorelines. The amendment must be implemented as soon as possible, but no later than six months following the preparation of the amendment.

Completion of the review and evaluation must be documented, and this documentation must include a signed statement indicating whether the Plan will be amended. Tables A-1 and A-2 in Appendix A are provided to serve as the documentation for these periodic reviews.

2.2 GENERAL PLAN REQUIREMENTS (112.7)

2.2.1 SPCC PLAN PREPARATION

An SPCC Plan must be prepared for any facility subject to 40 CFR 112. S-K must prepare a Plan because it meets the following requirements:

- It is a non-transportation-related onshore facility engaged in storing and using oil and oil products, which due to its location, could reasonably be expected to discharge oil in quantities that may be harmful, as described in 40 CFR 110, into or upon the navigable waters of the United States or adjoining shorelines.
- It has an aggregate aboveground storage capacity exceeding 1,320 gallons of oil, counting only containers of oil with a capacity of 55 gallons or greater.

2.2.2 MANAGEMENT APPROVAL

A SPCC Plan must have the full approval of management at a level of authority to commit the necessary resources to fully implement the Plan. A signed statement of approval for this Plan by S-K management is found in Section 1.3.

2.2.3 PLAN SEQUENCE

The sequence of an SPCC Plan must follow the sequence specified in 40 CFR 112.7. If this sequence is not followed, an equivalent Plan meeting all applicable requirements must be prepared, and a cross-reference must be provided. In general, this Plan follows the required sequence; however, there are some deviations. Table 2-1 provides the locations of applicable requirements within this Plan.

2.2.4 FUTURE IMPLEMENTATION

If an SPCC Plan calls for procedures, methods, or equipment not yet fully operational or for additional facilities, these items must be discussed separately, and the discussion must explain the details of installation and operational startup. Currently, S-K has no intention of changing any operations related to this Plan, nor does the Facility plan on adding any equipment or amending any procedures related to this Plan.

2.3 <u>CONFORMANCE WITH PLAN REQUIREMENTS (112.7[a][1], 112.8[a])</u>

S-K conforms to all applicable requirements listed in 40 CFR 112, including those listed under Sections 112.7 and 112.8. This Plan and all actions taken in accordance with this Plan attest to S-K's conformance at this facility.

2.4 DEVIATIONS FROM PLAN REQUIREMENTS (112.7[a][2])

Certain deviations in the Plan requirements are allowed under 40 CFR 112.7(a)(2), if equivalent environmental protection is provided. Based on a review by the Professional Engineer certifying this SPCC Plan, S-K has the following exception that deviate from the applicable requirements:

- Each bulk container installation must be engineered with good engineering practice to avoid discharges by providing a device such as a high level alarm or direct



40 CFR 112 Citation	Description	SPCC Plan Section
112.3(d)	Professional Engineer's Certification	1.1
112.4(a)	Written Notifications to EPA	4.3.2
112.4(c)	Written Notifications to States	4.3.2
112.5	Plan Review and Amendment	2.1
112.7	General Plan Requirements	2.2
112.7(a)(1)	Conformance with Plan Requirements	2.3
112.7(a)(2)	Deviations from Plan Requirements	2.4
112.7(a)(3)	Facility Layout	3.2
112.7(a)(3)(a)(i)	Facility Oil Storage	3.3
112.7(a)(3)(a)(ii)	Facility Discharge Prevention Measures	3.4
112.7(a)(3)(a)(iii)	Facility Discharge and Drainage Controls	3.5
112.7(a)(3)(a)(iv)	Facility Discharge Countermeasures	3.6
112.7(a)(3)(a)(v)	Disposal of Recovered Materials	4.4
112.7(a)(3)(a)(vi)	Emergency Contacts	4.1
112.7(a)(4)	Requirements for Oral Discharge Reporting	4.3.1
112.7(a)(5)	Discharge Response Procedures	4.2
112.7(b)	Potential Discharge Predictions	5.0
112.7(c)	Containment Systems and Diversionary Structures	6.1
112.7(d)	Contingency Planning	6.2
112.7(e)	Inspections, Tests, and Records	6.3
112.7(f)	Personnel and Training Procedures	6.4
112.7(g)	Security	6.5
112.7(h)	Facility Loading/Unloading Rack	6.6
112.7(i)	Brittle Fracture Evaluation	6.7
112.7(j)	State Requirements	6.8
112.8(a)	Conformance with Plan Requirements	2.3
112.8(b)	Facility Drainage	6.9
112.8(c)	Bulk Storage Containers	6.10
112.8(d)	Facility Transfer Operations	6.11
112.20	Facility Response Plans	4.5

Table 2-1. Locations of SPCC Plan Requirements within This Plan

Source: ECT, 2011.

Vision gauge per 40 CFR 112.8(c)(8). Due to their size, such a device is not provided for onsite 55-gallon storage containers used to store used oil. However, S-K personnel are instructed to monitor the level of oil which is visible through the opening in the top of the drums, allowing S-K personnel to determine when the container is full (refer to Section 6.10.8). Thus, equivalent environmental protection is provided.

3.0 FACILITY INFORMATION

3.1 DETAILED SUMMARY

Facility Owner:	Safety-Kleen Systems, Inc. 5360 Legacy Drive, Building 2, Suite 100 Plano, Texas 75024 Telephone: (972) 265-2000
Facility Operator:	Safety-Kleen Systems, Inc. 359 Cypress Road Ocala, Florida 34472 Telephone: (352) 687-0688 Fax: (352) 687-8511
Latitude/Longitude:	29° 04' 54" North 81° 59' 2" West
Facility Street Address:	359 Cypress Road Ocala, Florida 34472
Facility Phone/Fax:	Telephone: (352) 687-0688 Fax: (352) 687-8511
Depot Manager:	Mr. Darwin "Troy" Robinson

3.2 FACILITY OPERATIONS AND LAYOUT (112.7[a][3])

The location of the S-K facility is shown on the U.S. Geological Survey (USGS) topographic quadrangle site location map presented as Figure 3-1. Figure 3-2, the site layout map, provides a more detailed view of the facilities, including locations of oil storage equipment and storm water drainage pathways.

The subject facility consists of a 12.3-acre developed plot of land. The facility includes the oil/industrial wastewater storage area, solid waste processing area, rail car unload-ing/loading area, warehouse, administration building, landscaped areas, and parking area. With the exception of the rail car area, the site is fenced and access is controlled by a gate and chain-link fence. The facility is manned 24 hours per day, Monday through Friday.









Operations at the S-K Facility include the processing of used oil. Additionally, the facility also collects used oil filters and oil-impacted waste (e.g., soil, rags, absorbent materials, etc.). New oil and other oil products used for maintenance purposes (less that 1gallon in capacity) are stored within safety cabinets located throughout the warehouse building.

Storm water from the northeastern portion of the facility sheet flows across the paved areas and is collected by the northern storm water retention pond. Storm water from the rest of the facility sheet flows through the pavement into the southern storm water retention pond. Storm water collected in the retention ponds percolates into the ground, so there is no discharge. It is estimated that approximately 65-70% of the facility is paved. The remaining portion includes storm water retention ponds and landscaped areas. Storm water that falls within the unpaved areas mainly percolates into the ground.

Land use in the vicinity of the S-K Facility is industrial. A residential development and an unnamed retention pond are located approximately 600 feet north of the railroad easement that borders the site along the northern boundary.

3.3 FACILITY OIL STORAGE (112.7[a][3][i])

40 CFR 112.2 defines "oil" as:

"Oil means oil of any kind or in any form, including, but not limited to: fats, oils, or greases of animal, fish, or marine mammal origin, vegetable oils, including oils from seeds, nuts, fruits, or kernels; and, other oils and greases, including petroleum, fuel oil, sludge, mineral oils, oil refuse, or oil mixed with wastes other than dredged spoil."

"Bulk storage container" is defined as:

"Means any container used to store oil. These containers are used for purposes including, but not limited to, the storage of oil prior to use, while being used, or prior to further distribution in commerce. Oil-filled electrical, operating, or mechanical equipment is not a bulk storage container."

As noted in the above definition, EPA has specifically excluded oil-filled electrical, operating, or manufacturing equipment from the definition of bulk storage container. This type of equipment may be exempt from certain requirements of the SPCC rule, including



secondary containment and integrity testing; however, the additional requirements for spill prevention and response provided in 112.7 are applicable to ensure any discharge does not reach navigable waters. The volume of oil storage in this equipment must also be listed in the SPCC Plan and the equipment locations shown on the facility drawings with this SPCC Plan.

Oil storage at the facility consists of used oil, fuel oil, diesel oil, dehydrated oil, industrial wastewater (i.e., oily water), diesel fuel, lubricating oil, and cutting oil. Other petroleum products (i.e., oil, grease, gasoline, etc.) are stored in small containers (i.e., 5 gallon or smaller) and are not subject to the SPCC requirements.

Table 3-1 lists the oil storage containers 55 gallons in capacity and higher located at the facility and their respective volumes, contents, and locations. The locations of these containers are also shown on Figure 3-2.

3.4 FACILITY DISCHARGE PREVENTION MEASURES (112.7[a][3][ii])

S-K has provided adequate discharge prevention measures through the implementation of this Plan. All employees handling oil and their supervisors must be properly trained in the topics covered by this Plan; this training is intended to reduce the likelihood of a discharge of oil and is conducted upon commencement of employment and refreshed annually. Routine inspections are conducted to discover any discharges and to prevent future discharges by noting any corrective actions that may be required. Security measures are in place to allow the discovery of any discharges and to deter vandalism that might result in a discharge. When loading/unloading oil from/to bulk storage tanks, procedures are in place to prevent accidental discharges.

3.5 FACILITY DISCHARGE AND DRAINAGE CONTROLS (112.7[a][3][iii])

S-K has provided adequate discharge and drainage controls through the implementation of this Plan. All oil containers are provided with adequate secondary containment and/or alternative equivalent measures. Several spill kits equipped with absorbent material and other response equipment are located at the throughout the warehouse and tank farm areas. The location of the spill kits is illustrated on Figure 3-2.



 Table 3-1 Oil Storage

<u>Tank</u> <u>Number</u>	<u>Tank Capacity</u> (G)	Tank Contents	Location Onsite	Installation Date
			Main Tank Farm Containment	
1	30,000	Used Oil	Area	December, 1999
2	30,000	Used Oil	Main Tank Farm Containment Area	December, 1999
3	30,000	Used Oil	Main Tank Farm Containment Area	December, 1999
4	30,000	Used Oil	Main Tank Farm Containment Area	December, 1999
5	30,000	Used Oil	Main Tank Farm Containment Area	December, 1999
6	30,000	Used Oil	Main Tank Farm Containment Area	December, 1999
7	30,000	Used Oil	Main Tank Farm Containment Area	December, 1999
8	30,000	Used Oil	Main Tank Farm Containment Area	December, 1999
9	30,000	Used Oil	Main Tank Farm Containment Area	December, 1999
10	30,000	Used Oil	Main Tank Farm Containment Area	December, 1999
11	30,000	Used Oil	Main Tank Farm Containment Area	December, 1999
12	30,000	Used Oil	Main Tank Farm Containment Area	December, 1999
13	30,000	Used Oil	Main Tank Farm Containment Area	December, 1999
14	30,000	Used Oil	Main Tank Farm Containment Area	December, 1999
15	30,000	Used Oil	Main Tank Farm Containment Area	December, 1999
16	30,000	Used Oil	Main Tank Farm Containment Area	December, 1999
17	20,000	Industrial Wastewater	South Tank Farm Containment Area	2001
18	20,000	Industrial Wastewater	South Tank Farm Containment Area	2001
19	20,000	Industrial Wastewater	South Tank Farm Containment Area	2001
20	20,000	Industrial Wastewater	North Tank Farm Containment Area	2002
21	20,000	Industrial Wastewater	North Tank Farm Containment Area	2002
22	20,000	Used Antifreeze	North Tank Farm Containment Area	2002
23	20,000	Industrial Wastewater	North Tank Farm Containment Area	2002
24	30,000	Used Oil	Southern Tank Farm Contain- ment Area	2003


<u>Tank</u> Number	Tank Capacity (G)	Tank Contents	Location Onsite	Installation Date
			Southern Tank Farm Contain-	
25	30,000	Used Oil	ment Area	2003
			Southern Tank Farm Contain-	
26	30,000	Used Oil	ment Area	2003
			Southern Tank Farm Contain-	
27	30,000	Used Oil	ment Area	2003
•	•••••		Southern Tank Farm Contain-	
28	30,000	Used Oil	ment Area	2003
20	20.000	Used Oil	Southern Tank Farm Contain-	2002
29	30,000	Used Off	ment Area	2005
30	30,000	Used Oil	Southern Tank Farm Contain-	2003
50	50,000	Used Off	South and Tank Forms Contain	2003
31	30.000	Used Oil	ment Area	2003
32	13.000	Fuel Oil	Warehouse Building	December, 1999
33	2,700	Fuel Oil	Warehouse Building	December, 1999
34	2,700	Fuel Oil	Warehouse Building	December, 1999
35	6,500	Used Oil	Warehouse Building	December, 1999
36	3,000	Fuel Oil	Warehouse Building	December, 1999
		Processor/dehydrator		
37	1,000	#3	Warehouse Building	December, 1999
38	6,000	Low Flash Recovery	Warehouse Building	December, 1999
		Recovered Process		
39	6,000	Water	Warehouse Building	December, 1999
40	6,000	Low Flash Recovery	Warehouse Building	December, 1999
41	110	Knockout Tank	Warehouse Building	December, 1999
42	12,000	Hot Gas Generator	Warehouse Building	December, 1999
43	6 000	Knockout Tank	Warehouse Building	December, 1999
44	0,000	Debudrator #2	Warehouse Building	December, 1999
45	6,000	Fuel Oil Mineral Oil	Warehouse Building	December 1999
40	1,000	Debydrator #1	Warehouse Building	December 1999
47	500	Empty	Warehouse Building	December 1999
49	6,000	Low Flash Recovery	Warehouse Building	December, 1999
50	2,000	Knockout Tank	Knockout Storage Area	December, 1999
51	1,000	Knockout Tank	Knockout Storage Area	December, 1999
52	300	Knockout Tank	Knockout Storage Area	December, 1999
53	159,000	Used Oil	Southeast Containment Area	2005
54	159,000	Industrial Wastewater	Southeast Containment Area	2005
			North Tank Farm Containment	
55	9,400	Stormwater	Area	December, 1999
			South Tank Farm Containment	
56	14,100	Stormwater	Area	2001
			South Tank Farm Containment	
57	1,100	Off-road Diesel Fuel	Area	2001



The movement of 55-gallon drums, while in use, is allowed without secondary containment, provided the drums are returned to areas of secondary containment after use. As part of the oil transfer operations, precautions are taken to prevent spills or releases and to control a release if it should occur. These precautions include (i) close supervision of transfer operations by facility personnel during all stages of loading/unloading, (ii) the placement of drain mats and/or absorbent socks/pigs to prevent spilled oil from entering drainage structures or contacting environmental media, and (iii) the staging of spill cleanup material spill kits that are in close proximity to the loading/unloading activities.

3.6 FACILITY DISCHARGE COUNTERMEASURES (112.7[a][3][iv])

S-K has provided adequate means for the discovery, response, and cleanup of discharges of oil through the implementation of this Plan. Potential discharges will be discovered through routine inspections. If such a discharge is found, appropriate response and clean-up measures are in place. Any cleanup beyond spill recovery is considered remediation and is beyond the scope of this Plan.



4.0 DISCHARGE RESPONSE

4.1 EMERGENCY CONTACTS (112.7[a][3][vi])

4.1.1 FACILITY CONTACTS

Facility Response Coordinator:	Darwin "Tı	oy" Robinson
1858 NE 29 th St.	Office:	(352) 687-0688
Ocala, FL 34479	Mobile:	(352) 425-0819
	Home:	(352) 454-5739
Alternate Contact:	Joe Ventry	
2337 NE 12 th Ct.	Office:	(352) 687-0688
Ocala, FL 34470	Mobile:	(352) 304-0023
	Home:	(352) 402-9747
Safety-Kleen INFOTRAC	Telephone:	(800) 468-1760

4.1.2 DISCHARGE NOTIFICATION

National Response Center	Toll-free: Telephone:	(800) 424-8802 (202) 267-2675
EPA Region 4	Telephone:	(404) 562-8700
State Warning Point	Telephone:	(800) 320-0519
FDEP Central District	Telephone:	(407) 893-3337
Columbia County Health Department Storage Tank Program Office	Telephone:	(386) 758-2140

4.1.3 STATE AND LOCAL EMERGENCY RESPONSE AGENCIES

Fire/Police Department	Telephone:	911
	1	

4.1.4 AVAILABLE SPILL RESPONSE CONTRACTORS

SWS Environmental First Response Telephone: (800) 852-8878

4.2 DISCHARGE RESPONSE PROCEDURES (112.7][a][(5])

The discharge response procedures listed in this subsection should be followed by facility response personnel to contain discharges and minimize dangers to public health and safety and the environment in the event of an oil discharge.





4.2.1 PERSON DISCOVERING DISCHARGE

- 1. Quickly assess the severity of the discharge in terms of quantity and consequences.
- 2. Alert any other facility personnel working in the area of the spill, and notify the Facility Response Coordinator and report the location of the discharge, the type of material discharged, the quantity of material discharged, and any additional information that the Coordinator may need.
- 3. If personnel adequately trained in discharge response are available, the Facility Response Coordinator (or designee) will implement the procedures in Section 4.2.3 to contain the discharge. Otherwise, summon additional trained personnel to respond to the discharge.
- 4. Complete as much of the appropriate Discharge Report Form as possible (this Form is found in Appendix B).

4.2.2 FACILITY RESPONSE COORDINATOR

- 1. Based on the information provided by the person who discovered the discharge, notify the appropriate agencies of the discharge in accordance with the requirements listed in Section 4.3.
- 2. Oversee spill response in containing the discharge, as necessary.

4.2.3 **RESPONSE PROCEDURE**

- 1. Obtain discharge response equipment from the nearest spill kit.
- 2. Isolate nearby storm drains with absorbent socks or pigs.
- 3. If inside, place absorbent socks along the bottom of nearby exterior doorways.
- 4. Stop the release of material at the source, if possible.
- 5. Stop the flow of spilled material by surrounding the spilled material with absorbent socks or absorbent media.
- 6. Spread granular absorbent on the spilled oil to stabilize and to contain the material. Vacuum trucks will be used for larger spills.
- 7. Use a shovel or other tools to place the absorbent material and absorbed oil in an empty drum. Properly label the drum.

- 8. Use soapy water, detergent, or other appropriate materials to clean up the remaining oil. Allow to drain only after any visible oil sheen has been removed.
- 9. Restock spill kit as necessary.

4.3 DISCHARGE NOTIFICATION

Appendix B contains blank discharge report forms for the facility. The forms ask for many types of information and this broad range of information covers the information that must be reported for the various oral and written notifications for federal and state agencies. Not all of this information will be required for a given notification; please refer to Sections 4.3.1 and 4.3.2 for the specific requirements. However, try to have as much of the information available as possible.

4.3.1 ORAL NOTIFICATIONS (112.7[a][4])

Under the Clean Water Act, discharges of oil to navigable waters of the United States meeting the following criteria may be harmful to the public health or welfare or the environment:

- Violates applicable water quality standards.
- Causes a film or sheen upon or discoloration of the surface of the water or adjoining shorelines, or causes a sludge or emulsion to be deposited beneath the surface of the water or upon adjoining shorelines.

Such a discharge does not have to be large. For example, a pint of oil can cover 1 acre of water surface area. Nonetheless, an immediate notification must be made to the National Response Center (NRC). If notification to the NRC is not possible, the spill must be reported verbally to EPA Region 4. Discharges that do not involve spills to navigable water in excess of threshold quantities or which pose an immediate threat to human health or the environment must be immediately reported to the State Warning Point or local fire department.

National Response Center	(800) 424-8802
EPA Region 4	(404) 562-8700
State Warning Point	(800) 320-0519



When notifying any of these agencies, the following information must be provided:

- Exact address or location and phone number of the facility.
- Date and time of the discharge.
- Type of material discharged.
- Estimates of the total quantity discharged.
- Estimates of the quantity discharged into or upon the navigable waters of the United States or adjoining shorelines.
- Source of the discharge.
- Description of all affected media.
- Cause of the discharge.
- Damages or injuries caused by the discharge.
- Actions being used to stop, remove, and mitigate effects of the discharge.
- Whether an evacuation may be needed.
- Names of individuals and/or organizations who have also been contacted.

Additionally, have as much of the following information available as possible:

- Your name, location, organization, and telephone number.
- Name and address of the party responsible for the incident.
- Danger or threat posed by the release or discharge.
- Weather conditions at the incident location.
- Any other information that may help emergency personnel respond to the incident.

4.3.2 WRITTEN NOTIFICATIONS (112.4[a], 112.4[c])

4.3.2.1 Federal Regulations

The EPA requires that a written report be submitted within 60 days to the appropriate Regional Administrator and State agency, whenever there is a single discharge of oil exceeding 1,000-gallons or two discharges of oil exceeding 42-gallons, each within any 12-month period. Send the reports to the following addresses:



United States Environmental Protection Agency, Region 4 SPCC/FRP Coordinator U.S. Environmental Protection Agency Region 4 61 Forsyth Street, SW Atlanta, Georgia 30303-3104

A copy of this written report will be sent to the State at the following address:

Emergency Response Manager 3319 Maguire Boulevard, Suite 232 Orlando, Florida 32803-3767

The written report must contain the following information:

- Name of the facility.
- Name and contact information of responsible person.
- Location of the facility.
- Maximum storage or handling capacity of the facility and normal daily throughput.
- Corrective action and countermeasures you have taken, including a description of equipment repairs and replacements.
- An adequate description of the facility, including maps, flow diagrams, and topographical maps, as necessary.
- The cause of the discharge, including a failure analysis of the system or subsystem in which the failure occurred.
- Additional preventative measures taken or contemplated to minimize possibility of recurrence.
- Such other information as the Regional Administrator may reasonably require pertinent to the Plan or discharge.

Although the EPA Regional Administrator may request a copy of the SPCC Plan, after reviewing the spill notification report, it is not necessary to include a copy of the Plan with the report.



4.3.2.2 <u>State Regulations</u>

In addition to the federal regulations, the State of Florida has requirements for notification and reporting discharges as found in Chapter 62-770.250, Florida Administrative Code (F.A.C). The rules require that upon discovery of contamination (unless the contamination is known to be from a non-petroleum product source) or upon a discharge of petroleum or petroleum products, notification shall be submitted using the Discharge Report Form (Form Number 62-761.900(1)). Discharges of reportable quantities onto the surface of lands or to surface waters shall be reported to the State Warning Point or Department of Environmental Protection, Bureau of Emergency Response as soon as possible but no later than 24 hours after occurrence.

Additionally, Chapter 62-762.451(2) requires that notification of the following incidents shall be made to the County on Form 62-761.900(6) within 24 hours or before the close of the County's next business day:

- The loss of a regulated substance from a storage tank system exceeding 100 gallons on impervious surfaces, other than secondary containment, provided that the loss does not come in contact with pervious surfaces.
- The loss of a regulated substance exceeding 500 gallons inside a dike field area with secondary containment.

Appendix B contains a copy of blank FDEP discharge reporting forms (i.e., Form Number 62-761.900(1) and 62-761.900(6)) that must be submitted to the local County regulatory agency.

Many types of information are required to complete the form, and this broad range of information covers everything that must be reported for the various oral and written notifications for federal and state agencies. The information for this report form may be completed as it becomes available and the form may include areas that are not applicable to all discharges. Copies of all reports and any attachments are to be maintained in Appendix B.



4.4 <u>DISPOSAL OF RECOVERED MATERIALS (112.7[a][3][v])</u>

S-K currently processes used oils, oil-soaked rags, and other related oil-impacted waste as part of their business. All oil-soaked material generated by S-K is properly processed and disposed of by S-K. In the event of an oil discharge at the S-K Facility, oil will be recovered using granular absorbent and oil absorbent materials found in the spill kits described in Section 6.1. Recovered material associated with large spills will be handled and disposed by SWS.

4.5 FACILITY RESPONSE PLAN (112.20)

A facility response plan (FRP) is a plan for responding, to the maximum extent practicable, to a worst-case discharge of oil, or to a substantial threat of such a discharge. An FRP also covers response to smaller discharges. However, an FRP is required only for a nontransportation-related onshore facility that, because of its location, could reasonably be expected to cause substantial harm to the environment by discharging oil into or on the navigable waters or adjoining shorelines. As documented in Section 1.4, this S-K Facility does not meet the substantial harm criteria and, therefore, does not require an FRP.



5.0 POTENTIAL DISCHARGE PREDICTIONS (112.7[b])

Table 5-1 presents the potential discharge predictions for the S-K Facility. Because of the facility's containment systems and/or alternative equivalent measures, there is not a reasonable potential for a major equipment failure to result in a discharge. However, in the event of a discharge that escapes any secondary containment, a spill kit will be available, which will include absorbent material, socks, pigs, and pads. If a discharge were to escape the secondary containment units, the oil would be contained within the onsite retention ponds. The onsite retention ponds are not equipped with discharge or overflow devices.



Table 5-1. Potential Discharge Predictions

Source	Type of Failure	Largest Container Volume (gallons)	Discharge Rate (gal/hr)	Direction of Flow	Containment (gallons)
Aboveground storage tanks within main tank farm area (Tanks 1 through 16)	Tank rupture, loading or unloading operations, fire, or explosion	30,000	30,000	For tank rupture or pipe failure, within the sec- ondary containment area. In the event of secondary containment failure, to the southern retention pond.	Containment area capable of containing in excess of 75,000 gallons; southern retention pond capable of containing in excess of 520,000 gallons
Aboveground storage tanks within south tank farm area (Tanks 17 through 19 and 57)	Tank rupture, loading or unloading operations, fire, or explosion	20,000	20,000	For tank rupture or pipe failure, within the sec- ondary containment area. In the event of secondary containment failure, to the southern retention pond.	Containment area capable of containing in excess of 31,000 gallons; southern retention pond capable of containing in excess of 520,000 gallons
Aboveground storage tanks within north tank farm area (Tanks 20 through 23)	Drum rupture or leakage	20,000	20,000	For tank rupture or pipe failure, within the sec- ondary containment area. In the event of secondary containment failure, to the northern retention pond.	Containment area capable of containing in excess of 29,000 gallons; northern retention pond capable of containing in excess of 65,000 gallons
Aboveground storage tanks within southern tank farm area (Tanks 24 through 31)	Tank rupture, loading or unloading operations, fire, or explosion	30,000	30,000	For tank rupture or pipe failure, within the sec- ondary containment area. In the event of secondary containment failure, to the southern retention pond.	Containment area capable of containing approxi- mately 31,000 gallons; southern retention pond capable of containing in excess of 520,000 gallons
Process area warehouse building (Tanks 32 through 49)	Tank rupture, loading or unloading operations, fire, or explosion	30,000	30,000	Within Warehouse Build- ing. In the event of sec- ondary containment failure, to the northern retention pond	Northern retention pond capable of containing in excess of 65,000 gallons
Used oil tank area (Tanks 53 and 54)	Tank rupture, loading or unloading operations, fire, or explosion	159,000	159,000	For tank rupture or pipe failure, within the sec- ondary containment area. In the event of secondary containment failure, to the southern retention pond.	Containment area capable of containing approxi- mately 156,000 gallons; southern retention pond capable of containing in excess of 520,000 gallons
Knockout tank area (Tanks 50 through 52)	Tank rupture or leakage	2,000	2,000	For tank rupture or pipe failure, within the sec- ondary containment area. In the event of secondary containment failure, to the northern retention pond.	Containment area capable of containing approxi- mately 2,100 gallons; northern retention pond capable of containing in excess of 65,000 gallons



Source	Type of Failure	Largest Container Volume (gallons)	Discharge Rate (gal/hr)	Direction of Flow	Containment (gallons)
Used oil tanks loading/ unloading area	Tank overfill, hose rup- ture, equipment failure	8,000	Varies, 300 gpm maximum	For tank rupture or pipe failure, within the sec- ondary containment area. In the event of secondary containment failure, to the southern retention pond.	Containment area capable of containing approxi- mately 2,300 gallons; southern retention pond capable of containing in excess of 520,000 gallons
Rail car loading/un- loading area	Tank overfill, hose rup- ture, equipment failure	25,000	25,000	For tank rupture or pipe failure to the secondary containment area.	Containment area capable of containing in excess of 26,800 gallons
Drummed used oil waste/products ware- house building (maxi- mum 400 drums stored)	Drum rupture or leakage	55	55	Within Warehouse Build- ing. In the event of sec- ondary containment failure, to the southern retention pond	Building capable of con- taining in excess of 55 gallons; southern retention pond is capable of containing in excess of 520,000 gallons
Maintenance oil prod- ucts	Container rupture	<2.5	<2.5	Within safety cabinet. If escapes, to Warehouse Building floor (indoors).	Storage capacity in excess of 2.5 gallons
East loading /unloading area	Tank overfill, hose rup- ture, equipment failure	8,000	Varies, 300 gpm maximum	Area drains to northern retention pond.	Northern retention pond capable of containing in excess of 65,000 gallons
West loading /unloading area	Tank overfill, hose rup- ture, equipment failure	8,000	Varies, 300 gpm maximum	For tank rupture or pipe failure, within the sec- ondary containment area. In the event of secondary containment failure, to the southern retention pond.	Containment area capable of containing approxi- mately 4,950 gallons; southern retention pond capable of containing in excess of 520,000 gallons

Table 5-1. Potential Discharge Predictions (Continued, Page 2 of 2)

Source: S-K, 2011.



6.0 DISCHARGE PREVENTION MEASURES, CONTROLS, AND COUNTERMEASURES

6.1 <u>CONTAINMENT SYSTEMS AND DIVERSIONARY STRUCTURES AND</u> <u>EQUIPMENT (112.7[c])</u>

To prevent discharges of oil to navigable waterways, S-K has provided appropriate secondary containment for bulk storage containers and discharge prevention equipment capable of containing oil prior to cleanup. S-K maintains several oil-only spill kits and a supply of granular absorbent in the vicinity of each of the oil storage areas, for response to an accidental discharge. The oil-only spill equipment is composed of the following equipment:

- Over-pack spill drum with lid and ring.
- Absorbent granular material.
- Absorbent pads.
- Absorbent rolls.
- Disposable bags and ties.

Secondary containment structures are discussed in Section 6.10.2.

6.2 <u>CONTINGENCY PLANNING (112.7[d])</u>

As described in Sections 6.1, 6.6.1, 6.10.2, and 6.10.11, S-K has provided adequate secondary containment structures and discharge response procedures and equipment. Therefore, a contingency plan is not applicable.

6.3 INSPECTIONS, TESTS, AND RECORDS (112.7[e])

Formal facility visual inspections will be conducted weekly, and records of these inspections will be documented and signed by the inspector or the Director of Facilities. During the inspections, all storage tanks, piping, valves, transfer equipment, containment systems, and spill response equipment will be checked thoroughly for discharges and integrity. Any discrepancies noted during the inspections will be corrected as soon as practical to prevent the discharge of oil. A sample inspection form is provided in Appendix C.





Completed inspection forms will be maintained with the Plan in Appendix C for a minimum of three years.

6.4 <u>PERSONNEL, TRAINING, AND DISCHARGE PREVENTION PROCE-</u> <u>DURES (112.7[f])</u>

6.4.1 PERSONNEL TRAINING (112.7[f][1])

All S-K personnel that handle oil and that are involved with handling of oil products will be instructed on discharge prevention procedures, the actions to take in the event of a discharge, the use of discharge response equipment, applicable regulations pertaining to oil discharges, general facility operations, and the contents of this Plan. This instruction will occur within a reasonable time after implementation of this Plan for current employees and shortly after new hires begin work. Records of employee training will be maintained in Appendix D for at least three years.

6.4.2 DESIGNATED PERSON ACCOUNTABLE FOR DISCHARGE PRE-VENTION (112.7[f][2])

Mr. Darwin "Troy" Robinson, Depot Manager, is the designated person accountable for discharge prevention at this facility.

6.4.3 DISCHARGE PREVENTION BRIEFINGS (112.7[f][3])

All personnel that handle oil-filled equipment or oil containers will take part in discharge prevention briefings at least once a year to ensure adequate understanding of the Plan. Topics will include known discharges, failures, malfunctioning components, and any recently developed precautionary measures. Additionally, these briefings will serve as refreshers for the training described in Section 6.4.1. Sign-in sheets, which include the topics of discussion at each meeting, will be maintained as documentation in Appendix E for at least 3 years.

6.5 <u>SECURITY (112.7[g])</u>

6.5.1 FENCING (112.7[g][1])

Building doors and the control room controls are secured when the building is unattended. Additionally, the entirety of the S-K facility property, with the exception of the rail car area, is secured with a 6 foot high chain-link fence. Once the rail car loading activity



is completed, the car is sealed and considered to be under the authority of the Florida Department of Transportation. No loaded rail cars are kept at the facility during facility unmanned periods (i.e., Friday through Sunday and holidays).

6.5.2 VALVES (112.7[g][2])

The only valves that could permit flow are the tank loading and unloading valves. These valves are manually operated. Personnel are trained in proper tank loading and unloading procedures to prevent spills. Site security measures prevent access to these valves by unauthorized personnel. Rail car valves are also properly secured when not in used.

6.5.3 PUMPS (112.7[g][3])

Electric-powered pumps are used to transfer oil from containers and to empty all containment areas of accumulated storm water. When not in use, the pumps are set in the off position and de-energized. Personnel are trained in the proper use of the transfer pumps. The security gate around the facility prevents access to these pumps by unauthorized personnel.

6.5.4 **PIPING** (112.7[g][4])

Piping present at the facility consists of aboveground piping used to transfer oil to/from the process area (i.e., Warehouse Building) to the tank farm area and to/from the rail car unloading area. The security gate around the facility prevents unauthorized access to this piping. No underground piping is used at the S-K facility.

6.5.5 LIGHTING (112.7[g][5])

Exterior and interior lighting at the facility and rail car area is sufficient for the discovery of discharges from the oil storage and dispensing systems and to discourage acts of vandalism.

6.6 <u>FACILITY TANK CAR AND TANK TRUCK LOADING/UNLOADING</u> <u>RACK (112.7[h][1], [2], [3], [4])</u>

The rail car loading or unloading area is located along the northern portion of the facility. The area is equipped with a secondary containment unit capable of containing in excess



of 26,800 gallons. This secondary containment area is also equipped with a baffle system which helps capture any discharge from the top opening of the rail car during loading activities. Due to the length limitation associated with the secondary containment area, no more than four loaded rail cars are kept within the rail car loading area. Additionally, facility personnel are instructed to make sure all rail cars are completely situated within the extent of containment area before transferring the oil.

The west tank truck loading area is equipped with a secondary containment system capable of containing up to 4,950 gallons. Additionally, in the event of secondary containment failure, discharge oil will drain into the southern retention pond. The southern retention pond is not constructed with any outlets or overflow devices.

The east tank truck loading area drains into the northern retention pond. The northern retention pond is not constructed with any outlets or overflow devices.

Please note that in addition to the provided secondary containment, the risk of a discharge is low due to properly implemented best management practices (BMPs) as described below.

6.6.1 BEST MANAGEMENT PRACTICES (BMPS)

The following BMPs are implemented for all oil product/waste loading/unloading operations:

- Prior to commencing the loading or unloading operation, a trained S-K employee and driver will be present to visually inspect and monitor the operation. This employee and the truck driver, as applicable, will have been trained in the use of spill cleanup, spill response and notification procedures, and the mechanical equipment used to transfer or pump oil at the facility.
 S-K procedures require that at least one person must be within 25 feet of the vehicle while loading/unloading.
- Prior to commencing the loading or unloading operation, the rail car/tank truck will be immobilized as described in Section 6.6.2.



- For rail cars, the trained S-K employee will confirm the entirety of the rail car to be loaded is positioned within the extent of the containment area and the top opening of the rail car positioned within the side containment baffle.
- The S-K employee must verify the contents of the product being transferred and check the available capacity of the container receiving the load and make sure there is sufficient volume for the expected load.
- The S-K employee and driver will inspect all hoses, fittings, connectors, and pump equipment prior to use. Any equipment found to be unsafe or unserviceable will be replaced or repaired before transfer operations can commence.
- The driver and S-K employee will be present throughout the entire loading or unloading operation. Both the S-K employee and the driver will monitor the transfer operation to detect any discharges and to prevent overfilling of either the storage tank or the tank truck.
- In the event of a discharge, the driver of the truck or the S-K employee, will cease transfer operations and inform the Facility Response Coordinator and/or response personnel immediately. The driver and appropriate S-K personnel will respond to the discharge as described in Section 4.2.
- Prior to tank truck departure, the driver and S-K employee will collect product from drains and hoses, clean up any incidental discharges, and inspect the tank truck for leaks, as described in Section 6.6.3.

6.6.2 WARNING LIGHT OR PHYSICAL BARRIER SYSTEM (40 CFR 112.7[h][(2])

To prevent the tank truck from departing before complete disconnection of the transfer line, the driver will place the truck into first gear, set the parking brake, and chock the wheels before commencing the transfer of oil.

Prior to rail car loading/unloading, the rail car must be chocked and the blue caution flag posted on the rail before loading commences.



6.6.3 INSPECTION OF LOWERMOST DRAINAGE OUTLETS (40 CFR 112.7[h][3])

Prior to tank truck/rail car departure, the driver and S-K employee will inspect all drain outlets on the rail car/truck. If necessary, the outlets are tightened, adjusted, or replaced to prevent the discharge of oil while the vehicle is on site or during transit.

6.7 BRITTLE FRACTURE EVALUATION (112.7[i])

The 159,000 gallon field erected used oil tanks will be evaluated by a qualified inspector for risk of discharge or failure due to brittle fracture or other catastrophe every time any of the tanks undergoes a repair, alteration, reconstruction, or change in service. Upon findings or indications of the potential for brittle fracture, the tank will be emptied and taken out of service and appropriate corrective measures will be taken immediately.

6.8 STATE DISCHARGE PREVENTION REQUIREMENTS (112.7[j])

Florida has State regulations dealing with aboveground and underground storage tanks (USTs). These are defined in Chapter 62-761 and 62-762, Florida Administrative Code (F.A.C.).

6.9 FACILITY DRAINAGE (112.8[b])

6.9.1 DRAINAGE FROM DIKED STORAGE AREAS (112.8[b][1])

Draining of accumulated storm water is performed manually through the use of portable electric pumps.

Any accumulated storm water will be visually inspected for any evidence of oil contamination (e.g., sheen, smell, etc.) prior to discharge. If any sign of oil contamination is observed, the oil will be pumped into the industrial wastewater storage tank. If, upon inspection, there is no evidence of oil contamination, the containment area will be discharged to grade. Inspection of accumulated storm water will only be conducted by trained personnel.

Records for secondary containment drainage events will be kept with this SPCC Plan for a period of 5 years (Appendix F).



6.9.2 VALVES FOR THE DRAINAGE OF DIKED AREAS (112.8[b][2])

None of the secondary containment units are equipped with drainage valves.

6.9.3 DRAINAGE SYSTEMS FROM UNDIKED AREAS (112.8[b][3])

Drainage from areas that are outside of secondary containment (i.e. "undiked areas") with a potential for a discharge of oil due to operations at the site, include the tank truck loading/unloading areas. Drainage from any of these areas flows into either of the onsite retention ponds. The retention ponds are not equipped with any outlet or overflow structures.

6.9.4 DIVERSION SYSTEM FOR FINAL DISCHARGE (112.8[b][4])

Through the means discussed in Section 6.9.3, the undiked areas at the facility will drain into either of the onsite retention ponds. The retention ponds are not equipped with any outlet or overflow structures.

6.9.5 FACILITY DRAINAGE SYSTEMS AND EQUIPMENT (112.8[b][5])

S-K has no direct treatment system for its drainage waters. Facility personnel are instructed to pump any "impacted" storm water into the S-K process train for proper treatment. All process tanks and associated equipment are equipped with secondary containment system.

6.10 BULK STORAGE CONTAINERS (112.8[c])

Pursuant to 40 CFR 112.2, the containers at the site that meet the definition of "bulk storage containers" include those noted in Table 3-1.

6.10.1 CONTAINER COMPATIBILITY WITH CONTENTS AND STORAGE CONDITIONS (112.8[c][1])

All containers storing oil at the S-K Facility are constructed of materials that are compatible with oil.



6.10.2 SECONDARY CONTAINMENT (112.8[c][2])

Secondary containment and/or an alternative containment system is provided for each bulk storage container as defined in 112.2. A description of secondary containment is provided as follows:

- Tanks 1 through 16 are located within a secondary containment area capable of containing in excess of 75,000 gallons. The largest container in the area is 30,000 gallons in capacity.
- Tanks 17 through 19 and 57 are located within a secondary containment area capable of containing in excess of 31,000 gallons. The largest container is 20,000 gallons in capacity.
- Tanks 20, 21, and 23 are located within a secondary containment area capable of containing in excess of 29,000 gallons. The largest container is 20,000 gallons in capacity.
- Tanks 24 through 31 are located within a secondary containment area capable of containing in excess of 31,000 gallons. The largest container is 30,000 gallons in capacity. The containment system is capable of containing the volume of the largest container but does not provide enough freeboard for precipitation, however, this area drains directly into the southern retention pond therefore providing additional alternative method of containment
- Tanks 32 through 49, 44 are located within the northern portion of the warehouse building. The building consists of an enclosed metal frame building with a concrete floor. The building is not equipped with floor drains. All doorways and entrances are equipped with a curb to minimize the outflow of any spilled material. The building is capable of containment area capable of containing in excess of 25,000 gallons. The largest container is 13,000 gallons in capacity
- Tanks 53 and 54 are located within a secondary containment area capable of containing approximately 156,400 gallons. Although the containment system is not capable of containing the volume of the largest container (i.e., 159,000 gallons), this area drains directly into the southern retention pond therefore providing additional alternative method of containment.



- Tank 50 through 52 are located within a secondary containment area capable of containing approximately 2,150 gallons (dry weather). The containment system is capable of containing the volume of the largest container (i.e., 2,000 gallons).
- All 55-gallon drums and filter collection bins are stored within the southern portion of the warehouse building which is capable of containing in excess of 55 gallons in the event of a spill. The building consists of an enclosed metal frame building with a concrete floor. The building is not equipped with floor drains. All doorways and entrances are equipped with a curb to minimize the outflow of any spilled material.

6.10.3 DRAINAGE OF UNCONTAMINATED RAINWATER FROM DIKED AREAS (112.8[c][3])

Draining of accumulated storm water is performed manually through the use of a portable electric pump.

Any accumulated storm water will be visually inspected for any evidence of oil contamination (e.g., sheen, smell, etc.) prior to discharge. If any sign of oil contamination is observed, the oil will be pumped into the industrial wastewater storage tank and the tank inspected for leaks. If, upon inspection, there is no evidence of oil contamination, the collected storm water will be discharged to grade. Inspection of accumulated storm water will only be conducted by qualified, trained personnel.

Records for secondary containment drainage events will be kept with this SPCC Plan for a period of 5 years (Appendix F).

6.10.4 CORROSION PROTECTION OF COMPLETELY BURIED METALLIC STORAGE TANKS (112.8[c][4])

There are no completely buried metallic storage tanks at the facility. Therefore, this section is not applicable.



6.10.5 CORROSION PROTECTION OF PARTIALLY BURIED OR BUN-KERED METALLIC TANKS (112.8[c][5])

There are no partially buried or bunkered metallic tanks at the facility. Therefore, this section is not applicable.

6.10.6 ABOVEGROUND TANK PERIODIC INTEGRITY TESTING (112.8[c][6])

The field erected containers (i.e., 159,000 gallon aboveground tanks), will be integrity tested periodically and whenever material repairs are made. Integrity testing will at least include the visual inspection of the tanks by a qualified inspector. Based on industry standards (i.e., API Standard 653) these inspections will be conducted every 10 to 20 years throughout the life of the tanks or as required by Chapter 62-762, F.A.C.

Integrity testing of shop fabricated bulk storage container will not be required for the following reasons:

- Internal corrosion poses minimal risk of failure.
- Each container is inspected at least monthly.
- All sides of each container are visible (i.e., the container, or the secondary containment, has no contact with the ground).

Records of the inspections will be kept in Appendix C for at least three years.

6.10.7 LEAKAGE THROUGH DEFECTIVE INTERNAL HEATING COILS (112.8[c][7])

No container at the S-K Facility has internal heating coils. Therefore, this section is not applicable.

6.10.8 GOOD ENGINEERING PRACTICE OF CONTAINERS (112.8[C][8])

All bulk containers are equipped with either an audible alarm and pump cutoff device or side level indicator. These liquid level sensing devices are tested annually to ensure proper operation. When oil handling operations associated with the tanks equipped with side level indicators are being conducted, at least one S-K employee will be present to monitor the liquid level and the overall filling process in order to avoid a potential discharge of



oil. Any S-K employee monitoring the loading activity will be required to be in direct communication with the pump operator.

6.10.9 OBSERVATION OF EFFLUENT TREATMENT FACILITIES (112.8[c][9])

There are no effluent treatment facilities at the facility. Therefore, this section is not applicable.

6.10.10 CORRECTION OF VISIBLE DISCHARGES (112.8[c][10])

The bulk oil storage appurtenances at the facility will be visually inspected weekly (refer to Section 6.3). If any discharges are noted during the inspection, they will be cleaned up promptly, and the cause of the release corrected to prevent future discharges.

6.10.11 POSITION OF MOBILE OR PORTABLE OIL STORAGE CONTAIN-ERS (112.8[c][11])

Portable oil storage containers consist of the 55-gallon drums, oil filter bins, and smaller miscellaneous-use oil product containers. All of these portable oil product storage containers are kept in an upright position and within their respective designated storage area. In the event of a spill, any spilled material is immediately cleaned up and disposed of accordingly as required by the law.

6.11 <u>FACILITY TRANSFER OPERATIONS, PUMPING, AND FACILITUY</u> <u>PROCESS (112.8[d])</u>

Oil transfer operations occur between the rail car/tanker trucks to and from the facility. All oil transfer operations are manned to minimize the likelihood of a spill.

6.11.1 PROTECTION OF BURIED PIPING (112.8[d][1])

There is no buried piping at the facility. Therefore, this section is not applicable.

6.11.2 TERMINAL CONNECTIONS (112.8[d][2])

There are no terminal piping connections at the facility. Therefore, this section is not applicable.





6.11.3 DESIGN OF PIPE SUPPORTS (112.8[d][3])

All pipe supports associated with aboveground piping has been designed to minimize abrasion and corrosion including expansion and contraction.

6.11.4 INSPECTION OF ABOVEGROUND VALVES, PIPING, AND APPUR-TENANCES (112.8[d][4])

The piping used to transfer product from the rail car/tank truck to and from the facility is inspected visually prior to each use (refer to Section 6.3). The general condition of the piping and pump will be assessed, and each examined for leakage potential. If any component is found to be in poor condition or leaking, it will be taken out of service and repaired or replaced as soon as practical.

6.11.5 PROTECTION OF ABOVEGROUND PIPING AND OTHER TRANS-FER OPERATIONS FROM VEHICULAR TRAFFIC (112.8[d][5])

All the aboveground piping is located overhead away from vehicular traffic.



7.0 SPCC IMPLEMENTATION

This section identifies the areas where implementation of the requirements of 40 CFR 112 is needed at the S-K Facility. Currently, S-K complies fully with 40 CFR 112; therefore no issues must be addressed and/or implemented immediately.





APPENDIX A

ADMINISTRATIVE UPDATES



APPENDIX A—ADMINISTRATIVE UPDATES

Administrative updates to the Plan do not require certification by a registered Professional Engineer. Such certification is only required for a change that materially affects the facility's potential for a discharge of oil. Changes in information such as names, addresses, and phone numbers do not require the certification of a Professional Engineer (refer to Section 2.1.3). When administrative updates are made to this SPCC Plan, update the following table, indicating what was changed and which pages were affected.

Date	Updated by	Page(s) Affected	Reason(s) for Update(s)



Table A-1. SPCC Plan Periodic Reviews Requiring Amendment

I have reviewed and evaluated the SPCC Plan for the Safety-Kleen Ocala facility on the date listed and will amend the Plan as a result.

Number	Signature	Date
1		
2		
3		
4		
5		
6		

Table A-2. SPCC Plan Periodic Reviews Not Requiring Amendment

I have reviewed and evaluated the SPCC Plan for Safety Kleen Ocala facility on the date listed and will not amend the Plan as a result.

Number	Signature	Date
1		
2		
3		
4		
5		
6		



APPENDIX B

DISCHARGE REPORTS



APPENDIX B—DISCHARGE REPORTS

SAFETY-KLEEN FACILITY DISCHARGE REPORT

Facility Name:	Safety-Kleen Ocala Facility		
Facility Phone Number: (352) 687-0688			
Facility Address:	359 Cypress Road, Ocala, Florida 34472		
Largest Oil Storage Container:	<u>159,000-gallons</u> Normal Daily Oil Throughput: <u>Varies</u>		
Facility Description: Oil processing	ng facility		
	Eurometica Descripted?		
Discharge to motor that a	Evacuation Required :		
Discharge to water that e	teeds 1,000-gallons		
I wo discharges to water	that exceed 42-gallons each within 12-month period		
Discharge to water that v	iolates applicable water quality standards		
Discharge to water that ca	auses a sheen upon or discoloration of water surface		
Discharge to water that ca	auses a sludge or emulsion to form beneath water surface		
Incident Source and Location:			
Incident Date:	Weather Conditions:		
Approximate Time Incident Bega	n: Discovered: Ended:		
Material Discharged: Concentration of Discharge:			
Total Quantity Discharged:	gallons Qty. Discharged to Navigable Waters: gallons		
Affected Media:			
Transportation Characteristics of	f Media into Which Material Discharged:		
Person Possessing or Controlling	Material at Time of Discharge:		
Address:	Phone Number:		
Person Having Actual Knowledge	e of Facts Surrounding Discharge:		
Address: Phone Number:			
Person to Contact for Additional	Information Concerning Discharge:		
Address:	Phone Number:		



SAFETY-KLEEN OCALA FACILITY DISCHARGE REPORT (Cont'd.)

Cause of Discharge, Including Failure Analysis:					
Efforts Taken to Control or Mitigate Discharge:					
Harmful Effects of Discharge, if Known:					
Damages or Injuries Caused by Discharge:					
Corrective Actions and Countermeasures Taken, Including Equipment Repairs and Replacements:					
Measures Taken or Planned to Reduce Possibility of Recurrence:					
Present or Proposed Remedial Action at Site of Discharge:					
Individuals and/or Organizations Contacted:					
Prepared by: Title: Signature: Date:					



APPENDIX C

INSPECTION RECORDS



APPENDIX C-INSPECTION RECORDS

SAFETY-KLEEN OCALA FACILITY VISUAL INSPECTION RECORD

Inspector(s):_____

Date of Inspection:

Address: 359 Cypress Road Ocala, Florida 34472

Location	Inspection Items	Yes	No	N/A	Comments
Main tank farm	Tank Shell				
Tanks (1 through 16)	Secondary Containment				
	Valves				
	Piping				
	Evidence of Spills				
South tank farm	Tank Shell				
Tanks (17 through 19,	Secondary Containment				
57)	Valves				
	Piping				
	Evidence of Spills				
North tank farm	Tank Shell				
Tanks (21 through	Secondary Containment				
23)	Valves				
	Piping				
	Evidence of Spills				
Southern tank farm	Tank Shell				
(Tanks 24 through	Secondary Containment				
31)	Valves				
	Piping				
	Evidence of Spills				
Process warehouse	Tank Shell				
(Tanks 32 through 49,	Valves				
	Piping				
	Evidence of Spills				
	Spill Kit				
Used oil tank farm	Tank Shell				
(Tanks 53 through	Secondary Containment				
54)	Valves				
	Piping				
	Evidence of Spills				



Location	Inspection Items	Yes	No	N/A	Comments
Knockout tank farm	Tank Shell				
(Tanks 50 through	Secondary Containment				
52)	Valves				
	Piping				
	Evidence of Spills				
Drummed used oil	Condition of Drums				
product area	Evidence of Spills				
	Condition of Drums				
Rail car load-	Secondary Containment				
ing/unloading area	Valves				
	Spill Kit				
	Evidence of Spills				
Used oil tanks load-	Secondary Containment				
ing/unloading area	Valves				
	Spill Kit				
	Evidence of Spills				
Fastern load-	Secondary Containment				
ing/unloading area	Valves				
ing/unioading area	Spill Kit				
	Fyidence of Spills				
Western load-	Secondary Containment				
ing/unloading area	Valves				
	Spill Kit				
	Evidence of Spills				
Northern retention	Accumulated Storm Water				
pond	Evidence of Spills				
	Signs of Erosion				
Southern retention	Accumulated Storm Water				
pond	Evidence of Spills				
	Signs of Erosion				

Additional Comments:



APPENDIX D

PERSONNEL TRAINING RECORDS



APPENDIX D—PERSONNEL TRAINING RECORDS

SAFETY-KLEEN OCALA FACILITY PERSONNEL TRAINING RECORD

Course Title:

Address: 359 Cypress Road Ocala, Florida 34472

Instructor:

Date:

Signature	Printed Name	Social Security Number
	Topics Covered	
1		


APPENDIX E

DISCHARGE PREVENTION BRIEFING RECORDS



APPENDIX E—DISCHARGE PREVENTION BRIEFING RECORDS

Course Title:

Address: 359 Cypress Road Ocala, Florida 34472

Instructor:

Date:

Attendees					
Signature	Printed Name				
	Topics Covered				



APPENDIX F

SECONDARY CONTAINMENT DRAINAGE RECORDS



APPENDIX F—SECONDARY CONTAINMENT DRAINAGE RECORDS

SAFETY-KLEEN OCALA FACILITY SECONDARY CONTAINMENT DRAIN-AGE RECORD

Date of Event:

Person Responsible for Draining Containment:

Secondary Containment	Evidenc Contami	e of Oil ination?	Estimated Volume	Comments
Area	Yes	No	(Gallons)	



ATTACHMENT G

CONTINGENCY PLAN Revised 05/01/12 ATTACHMENT G – REVISED 05/01/12

SAFETY KLEEN SYSTEMS, INC.



OCALA, FLORIDA

CONTINGENCY PLAN

[AS REQUIRED BY 40 CFR 279.52]

PREPARED BY:



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> 110341-0200-1200 Revised: May 1, 2012



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1 CONTINGENCY PLAN PURPOSE AND IMPLEMENTATION [40 CFR 279.52(b)(i)]

The Safety Kleen Systems (S-K) Ocala facility Contingency Plan (Contingency Plan) was designed to minimize hazards to human health or the environment from fires, explosions, or any unplanned sudden or non-sudden release of used oil to air, soil, or surface water. *This plan shall be implemented whenever there is a fire, explosion, or release of used oil which could threaten human health or the environment*.

This plan has been written as an addendum to the facility's existing Spill Prevention, Control and Countermeasures Plan (SPCC), developed in compliance to 40 CFR Part 112. Collectively, both the Contingency Plan and SPCC define the emergency response procedures which will be implemented in the event of an emergency incident covered under this rule.

Both the Contingency Plan and the SPCC plan contain complimentary procedures that must be followed in the event of an emergency incident covered under this regulation. The SPCC must be referenced for specific inspection forms, logs and notification procedures referred to within the Contingency Plan.

The Emergency Coordinator (EC) of this Plan shall refer to the SPCC for specific notification protocols that must be followed in the event of an unplanned sudden or non-sudden release.

The Contingency Plan has been developed and implemented in accordance to the regulatory requirements specified at 40 CFR 279.52, General Facility Standards. This Plan is subject to immediate mandatory revisions in the case that any of the following events occur:

- Failure of the Plan in an emergency;
- Changes to the S-K Ocala facility in its design, construction, or operation and maintenance in a way that materially increases the potential for fires, explosions, or releases of oil, or changes the response necessary in an emergency;
- Changes in the EC, or
- Changes in the List of Emergency Equipment.

Revisions to the Contingency Plan made according to this section will be documented in the Administrative Updates form located in Appendix B.





2 ARRANGEMENTS MADE WITH LOCAL AUTHORITIES [40 CFR 279.52(b)(2)(iii)]

Copies of the Contingency Plan have been provided to the following agencies/regulatory authorities:

Marion County Fire Rescue

2122 Pine RoadOcala, FL 34472(352) 291-8000 or 911

Marion County Sheriff's Department

501 Water Road Ocala, FL 34472 (352) 402-6000 or 911

Munroe Regional Medical Center

1500 SW 1st Avenue Ocala, FL 34471 (352) 351-7200 or 911





3 LISTING OF QUALIFIED EMERGENCY COORDINATORS [40 CFR 279.52(b)(2)(iv)]

Primary Emergency Coordinator (EC)	Secondary Emergency Coordinator (EC)
Mr. Troy Robinson	Mr. Joe Ventry
1858 NE 29 th St.	2337 NE 12 th Ct.
Ocala, FL 34479	Ocala, FL 34470
Office (352) 687-0688	Office (352) 687-0688
Cell (352) 425-0819	Cell (352) 304-0023





4 EVACUATION PLAN AND PROCEDURE [40 CFR 279.52(b)(2)(vi)]

In the event of an emergency, evacuation from the facility may be necessary. Figure 1, illustrates the general evacuation flow that will be followed in the event that a facility evacuation is ordered as part of the response.

FACILITY SIGNALS AND COMMUNICATION

There is no public address system at the Ocala facility. All S-K facility staff are equipped with 2-way VHF radios for inter-plant communication. The EC shall communicate with the administration staff by cellular phone or 2-way VHF radios in the event of an emergency, and shall be responsible for directing a safe and orderly evacuation of all onsite staff and visitors to the muster point, as illustrated in Figure 1.

The EC or his/her assignee will be responsible for taking a roll/headcount of all evacuees, to ensure that all staff, visitors and contractors have been accounted for.





5 LISTING OF AVAILABLE EMERGENCY EQUIPMENT [40 CFR 279.52(b)(2)(v)]

To prevent and/or mitigate spills of oil, S-K has provided discharge prevention equipment capable of containing oil prior to cleanup. S-K maintains several oil-only spill kits and a supply of granular absorbent in the vicinity of each of the four main oil processing or storage areas, for response to an accidental discharge. The locations of these spill kits are illustrated in Figure 2. Each spill kit is composed of the following equipment:

- One pair of protective gloves;
- Over-pack spill drum with lid and ring;
- Absorbent granular material;
- Absorbent pads;
- Absorbent rolls; and
- Disposable bags and ties.

S-K has installed located fire extinguishers throughout the processing facility and administration building that are routinely inspected by Piper Fire Protection Services. Fire extinguisher locations are illustrated in Figure 2.

The processing facility and warehouse facility are also equipped with overhead fire sprinklers.





6 EMERGENCY PROCEDURES [40 CFR 279.52(b)(6)]

This section describes the specific steps that will be followed in the event of an imminent or actual emergency situation at the Ocala facility. The procedures are written so as to demonstrate compliance to 40 CFR 279.52(b)(6). Specific procedures have been developed to address the following scenarios:

- Fires;
- Explosions, and
- Unplanned sudden or non-sudden releases of oil to air, soil, or surface water at the facility.

Whenever there is an imminent or actual emergency situation, the primary or secondary emergency coordinator shall immediately:

- (A) Activate internal facility alarms or communication systems, where applicable, to notify all facility personnel; and
- (B) Notify appropriate state or local agencies with designated response roles if their help is needed.

Whenever there is a release, fire, or explosion, the Emergency Coordinator (EC) will immediately identify the character, exact source, amount, and a real extent of any released materials. This may be accomplished by observation or review of facility records or manifests and, if necessary, by chemical analyses.

Concurrently, the EC will assess possible hazards to human health or the environment that may result from the release, fire, or explosion. This assessment must consider both direct and indirect effects of the release, fire, or explosion (e.g., the effects of any toxic, irritating, or asphyxiating gases that are generated, or the effects of any hazardous surface water run-offs from water or chemical agents used to control fire and heat-induced explosions).

If the EC determines that the facility has had a release, fire, or explosion which could threaten human health, or the environment, outside the facility, he must report his findings as follows:

(A) If the assessment indicated that evacuation of local area may be advisable, The S-K EC will immediately notify the following appropriate local authorities listed below:

Agency	Contact Number
State of Florida Department of Environmental Protection (Central	407-894-7555
District)	
State Warning Point	800-520-0519
State Emergency Response Team	800-226-4329
Columbia County Health Department, Storage Tank Program Office	386-758-2140

The EC shall remain onsite as necessary and be available to help appropriate officials decide whether local areas should be evacuated.





The EC shall also be responsible for notifying either the government official designated as the on-scene coordinator for the geographical area, **OR** the National Response Center (using their 24-hour toll free number 800/424-8802).

The S-K EC report must include the following information to the National Response Center:

- (1) Name and telephone number of reporter;
- (2) Name and address of facility;
- (3) Time and type of incident (e.g., release, fire);
- (4) Name and quantity of material(s) involved, to the extent known;
- (5) The extent of injuries, if any; and
- (6) The possible hazards to human health, or the environment, outside the S-K Ocala facility.

6.1 FIRE RESPONSE PROCEDURE

- 1. In case of fire, use nearest telephone to call the fire department by dialing 911; activate the nearest fire pull box if one is available.
- 2. Notify everyone in the immediate area of the fire verbally that there is a fire and instruct them to evacuate the area according to the primary/secondary evacuation routes to the muster point;
- 3. If you have received proper fire extinguisher training, and are confident that you can control the fire in its incipient stage, located the closest fire extinguisher and attempt to extinguish the fire. If uncertain or untrained on fire extinguisher use, immediately vacate the area, and proceed to the muster point. Do not attempt to use a fire extinguisher if you are unsure of your ability to control the fire. Leave the immediate area!
- 4. Notify the facility EC or Secondary Emergency Coordinator (SEC) and adhere to any subsequent instructions issued by the EC during the emergency.
- 5. Provide the EC with any information you may have regarding the nature of the fire emergency.

6.2 EXPLOSION RESPONSE PROCEDURE

- 1. In the event of an explosion, use nearest telephone to summon the fire department by dialing 911; activate the nearest fire pull box if one is available. Do not enter any rooms, structures or areas that may appear to be damaged or compromised as a result of the explosion;
- 2. Scan the area for any fellow workers or visitors, and instruct them to evacuate to

6-2





the evacuation muster point;

- 3. Visually survey the immediate area for any fires that may have been initiated from the explosion. Do not enter any areas, structures or locations that appear to have been structurally compromised from the explosion.
- 4. If you have received proper fire extinguisher training, and are confident that you can control an incipient fire, locate the closest fire extinguisher and attempt to extinguish the fire. *If uncertain or untrained on fire extinguisher use, immediately vacate the area, and proceed to the muster point*. Do not attempt to use a fire extinguisher if you are unsure of your ability to fully extinguish the fire. Leave the immediate area!
- 5. Notify everyone in the immediate area of the fire verbally that there is a fire and instruct them to evacuate the affected area according to the primary/secondary evacuation routes to the muster point;
- 6. Notify the facility EC or Secondary Emergency Coordinator and adhere to any subsequent instructions issued by the EC during the emergency.
- 7. From a safe location, assist the EC by sharing any information or observations you may have made regarding the facility subsequent to the explosion to the EC.

6.3 UNPLANNED RELEASES OF OIL TO AIR, SOIL, OR SURFACE WATER

- In the event of an unplanned release, do not activate a fire alarm pull box unless there is a fire associated with the release.
- Promptly notify any personnel in the immediate area of the release to evacuate the area to the muster point.
- Evacuate the area.
- Proceed to the nearest safe location within the plant where there is a telephone. Notify the SK EC.
- Depending on the nature of the release, the EC or his designee may provide you with further instructions.
- The EC will be responsible for making all necessary local, regional and federal notifications that may be required in the event of a sudden or non-sudden release. Specific notification procedures to be followed are referenced in the facility's Spill Prevention Control and Countermeasures Plan, Section 4.0 Discharge Response. Specifically, Section 4.3.1 and 4.3.2 of the SPCC outline specific oral and written notification requirements.





7 ADDITIONAL RESPONSE MEASURES [40 CFR 279.52(b)(6)(v)]

- 1) During the emergency, the S-K EC or his/her designee will also take all reasonable measures necessary to ensure that fires, explosions, and releases do not occur, recur, or spread to other used oil or regulated/hazardous waste at the facility. These measures may include:
 - Suspending/stopping processes and normal facility operations;
 - Collecting and containing released used oil; and
 - Removing or isolating containers.
- 2) If cessation of oil recovery operations is required in response to a fire, explosion, or release, the EC or his/her designee will monitor for leaks, pressure buildup, gas generation, or ruptures in valves, pipes, or other equipment at all appropriate areas.
- 3) Immediately after an emergency, the S-K EC will coordinate the necessary recycling, storing, or disposing of recovered used oil, contaminated soil or surface water, or any other material that results from a release, fire, or explosion at the facility, as may be required.
- 4) Subsequent the emergency event, S-K management will notify the Regional Administrator, and state and local authorities that the facility is in compliance with paragraphs (b)(6)(viii)(A) and (B) of this section before operations are resumed in the affected area(s) of the facility. [Please refer to Appendix A for a copy of 40 CFR 279.52].
- 5) The EC must make note in the operating records, of the time, date and details of *any facility incident* requiring the implementation of this contingency plan.
- 6) The owner or operator must notify the Regional Administrator, and appropriate state and local authorities that the facility is in compliance with paragraphs (b)(6)(viii)(A) and (B) of this section *before operations* are resumed in the affected area(s) of the facility.



FIGURES

APPENDIX A

40 CFR 279.52

APPENDIX B

ADMINISTRATIVE UPDATES

ATTACHMENT H

UNIT MANAGEMENT PLAN DESCRIPTIONS Revised 05/01/12



A. <u>UNIT MANAGEMENT PLAN</u>

STORAGE TANKS

All tanks and/or containers implemented for used oil storage within the S-K facility meet the requirements of 40 CFR Parts 264 and 265 as applicable. All secondary containment meet the requirements of 40 CFR Part 279.45. All tanks and/or containers utilized for used oil storage, industrial wastewater storage, dehydrated oil, marine diesel oil and virgin diesel fuel are clearly labeled accordingly. S-K addresses any spill, leak or other discharge as described within S-K's Spill Prevention, Control and Countermeasure (SPCC) Plan (See Attachment F).

FACILITY STANDARDS

S-K maintains an internal communications system consisting of telephones, cellular phones, audible alarms and electrical alarms. Fire extinguishers (portable type) are located within the control booth and at various locations throughout the facility. All facility equipment is tested and/or inspected regularly. Copies of inspection/testing documentation are provided in the SPCC Plan. Housekeeping is implemented as required by S-K personnel to ensure adequate space for the unobstructed movement of spill response personnel and equipment. All local authorities have received a copy of S-K's SPCC Plan. The local authorities will be provided copies of the updated plan at the conclusion of the permit renewal process. S-K will clean close the facility as per 40 CFR Part 265 Subparts G and J. S-K has complied with RCRA Section 3010.

TANK FARM CONTAINMENT CALCULATIONS

The secondary containment volume calculations for the five tank farm areas were provided in the previous application dated July 26, 2006, and remain valid. The overall secondary containment system capacity has been calculated to take in to account the additions at the north (one addition) and south ends (two additional areas) of the Main Tank Farm Storage Area (MTFSA). Calculations for the Industrial Wastewater Storage Area are also provided, as referenced in the July 26, 2006 application.



STORAGE TANK REGISTRATION

The storage tanks for the S-K facility are registered with the Florida Department of Environmental Protection.

STRUCTURAL INTEGRITY

The structural integrity of the storage tanks, processing piping and process meet the performance standards for new storage tank systems in F.A.C. 62-762.501.

STORAGE AREA CAPACITIES

The storage areas operated by S-K are separated into five specific areas for bulk storage in tanks and container storage. The tank farm has 16 tanks for bulk storage of used oil, fuel oil, and marine diesel fuel (finished product) in the MTFSA. Two additional tank-receiving areas were constructed in 2001-2002. The two additional storage tank areas were constructed north and south of the existing MTFSA. The construction was similar to the existing MTFSA. The area of the North Tank Farm (NTF) is approximately 1,890 square feet (ft²). The area of the South Tank Farm (STFA) is approximately 1,800 ft².

The North and South Tank Farm secondary containment areas are connected to the MTFSA. A second area south of the Tank Farm (TM) was constructed in 2004. The Southern Tank Farm Area (SNTFA) is approximately 2,448 ft² in size. The South Tank Farm has three tanks, each with a capacity of 20,000 gallons, for receiving industrial wastewater. The South Tank Farm (STFA) also has a stormwater (14,100 gal.) and diesel fuel (1,100 gal.) tank. The tank numbers are (17 through 19, 56-57).

The North Tank Farm (NTF) has five tanks, four with a capacity of 20,000 gallons, for receiving industrial wastewater and antifreeze. The tank numbers are (20 through 23). The North Tank Farm Area also has stormwater tank with a capacity of 9,400 that is not currently in use. The Southern Tank Farm Area (SNTFA) has eight tanks, each with a capacity of 30,000 gallons. The tanks are numbered (24 through 31). The UOIWWSA has two 159,000 aboveground storage tanks. The tanks are numbered 53 and 54. The



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UOIWWSA has a loading/unloading area. Tank number 53 is for used oil storage and tank number 54 is for industrial wastewater storage, which is not currently in use.

The MTFSA secondary containment area has an effective capacity of approximately 158,280 gallons, which is sufficient to contain the volume of the largest tank. The South Tank Farm has a secondary containment capacity of 40,074.3 gallons. The North Tank Farm has a secondary containment capacity of 34,509.0 gallons. The Southern Tank Farm Area has a secondary containment capacity of 45,616.7 gallons. The combined tank farm containment areas have a capacity of 278,480.0 gallons. The loading/unloading areas on the east and west side of the tank farm have a secondary containment capacity of approximately 342 gallons and 4,950 gallons respectively. The west loading/unloading area has a trench secondary containment system that brings its total capacity to 6,068.5 gallons.



B. SAFETY-KLEEN OCALA UNIT MANAGEMENT PLAN

The UOIWWSA has a secondary containment capacity of 188,266.5 gallons. The UOIWWSA Bulk Petroleum Storage Area loading/unloading area has a secondary containment capacity of 9,931 gallons. The drum and container storage area is located in the south end of the warehouse. The types of waste stored in the drum and container storage area include used oil, used oil filters, used absorbent materials, sludge, and petroleum contaminated soil. Petroleum contact water will not be stored in the drum or container storage area. Waste will be stored in Department of Transportation approved shipping drums or containers. The shipping containers may be "roll-off" boxes (15, 20, or 40 cubic yard [yd³]), dump trailers, or drums (5, 10, 15, 55, or 85 gallon). The container storage area has a secondary containment capacity of approximately 24.248 gallons. The container storage area is divided into areas to allow the storage of 420 each waste 55-gallon drums (23,100 gallons), 24 each chemical product 55-gallon drums (1,320 gallons), five each 475-gallon totes (2,375 gallons), and three each waste 40-yd³ roll-off boxes (24,240 gallons). Adequate aisle space is maintained between rows of containers. The containers are inspected weekly to ensure the containers are in good condition and are not leaking using the Nonhazardous Waste Weekly Inspection Form. (See Form examples provided in Attachment D.)

The Processing Area is located in the north end of the warehouse building. The secondary containment capacity is 32,340 gallons and the largest tank is 13,000 gallons. The Knockout Tank Area has a secondary containment capacity of 2,652-gallons after a new 6-inch containment curb is added. The volume of the largest tank in the Knockout Tank Area is 2,000 gallons.

The Rail Tanker Loading/Unloading Facility Secondary Containment holds 27,117.9 gallons. The maximum rail tanker capacity that can be currently operated at the facility is 25,000 gallons.



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SOLID WASTE MANAGEMENT AREA (SWMA)

A solid waste management area for the solidification of solid waste is located at the Northwest corner of the facility (See Figure 1). An area within the solidification unit is used to place a roll-off box for the accumulation of processed solid waste. Two access points are provided for trucks to unload unprocessed solid waste on either side of the roll-off box. The solidification area has a roof, containment walls and curb. The solid waste solidification area has a containment capacity of 21,024 gallons. Containerized solid waste is stored in the drum storage area inside the south end of the warehouse. It is then moved to the SWMA for processing (solidification). The SWMA is equipped with a concrete floor that is coated with a two-part epoxy coating.

INSPECTIONS

The enclosed *Storage Tank and Drum Inspection Form* is used to complete monthly inspections of the tank systems and the associated piping and containment areas. The Form is also used to complete weekly inspections of the drum and container storage areas.







STORAGE TANK AND DRUM STORAGE INSPECTION FORM

ATTACHMENT I

SAFETY-KLEEN SYSTEMS CLOSURE PLAN OCALA FACILITY Revised 05/01/12



1. INTRODUCTION

This closure plan presents the program to be implemented by Safety-Kleen Systems, Inc. (S-K) for the entire tank farm, a waste drum storage area, an oil processing/re-refinery unit and associated containment area(s). The Main Tank Farm Storage Area (MTFSA) has 16 tanks total with 16 used oil tanks – which include used oil, recycled fuel oil, and marine diesel fuel. The South Tank Farm (STFA) has three tanks for receiving industrial wastewater, one stormwater tank, and one diesel fuel tank. The North Tank Farm (NTF) has three industrial wastewater tanks, one antifreeze tank, and one stormwater tank. The Southern Tank Farm Area (SNTFA) has an additional eight tanks for used oil storage. The entire Tank Farm collectively has 34 bulk storage tanks. The Used Oil/Industrial Waste Water Storage Area (UOIWWSA) has two tanks.

S-K would clean close each unit in accordance with the provisions of 40 Code of Federal Regulations (CFR) Part 265, Subparts G & J; Closure and Post Closure of Tank Systems, and Florida Administrative Code (F.A.C.) 62-762.801; Aboveground Storage Tank Systems. The procedures described herein will be adequate to clean close the facility in a manner that will eliminate the need for post-closure monitoring. This closure plan was developed to protect human health and the environment by closing the facility implementing procedures designed to eliminate post-closure escape of hazardous wastes, hazardous constituents, leachate or contaminated runoff to groundwater, surface waters and/or the atmosphere. This plan describes procedures for final closure of all waste storage units, associated piping and Containment area(s). A formal cost estimate using DEP Form 62-710.901(7) is provided in Attachment I-1. Associated detailed cost tables, third-party cost estimates, and background data obtained during the costing of this plan are also provided.

1.1 FACILITY LOCATION

S-K's Used Oil Processing Waste Water Treatment Facility is located at 359 Cypress Road, Silver Spring Shores in the City of Ocala, Marion County, Florida. A site plan depicting the location(s) of the waste treatment/storage units is presented in Figure 1.



1.2 HAZARDOUS WASTE PERMIT

S-K receives non-hazardous waste only. Any waste determined to be hazardous is returned to the generator or transported to a RCRA facility. However, it is possible that sludge generated from the treatment processes could be determined to be a hazardous waste. In this event, the facility manages any hazardous waste generated under DEP/EPA ID Number FLR000060301 as a small quantity generator.

1.3 FACILITY CONTACT

During closure the facility contact(s) are the following:

Mr. Troy Robinson, General Manager Safety-Kleen Systems, Inc. 359 Cypress Rd. Silver Spring Shores Ocala, Florida 34472 Telephone: (352) 687-0688



2.0 FACILITY DESCRIPTION

2.1 PROCESS DESCRIPTION

S-K is primarily engaged in processing of used oil into recycled fuel oil. In addition, the facility processes and bulks certain non-hazardous solid waste streams for transport to a solid waste landfill. The facility also conducts the storage of used oil, non-hazardous industrial wastewater, used antifreeze, used oil filters, and other petroleum contaminated materials. The facility is located in Ocala, Florida. Used oil and related used oil products (filters, etc.) may come from a variety of sources including, but not limited to:

- Automotive and Industrial waste oil lubricants, cooling oils and wash water;
- Bilge slops and wash waters from the shipping industry;
- Wastewater and oils from storage tanks, pits, ponds, and lagoons associated with manufacturing operations;
- Wastewater and oils from tank cleaning and tank bottoms from petroleum storage facilities;
- Petroleum Contact Water as defined in Chapter 62-740, F.A.C.; and
- Solid waste from industrial generators.

S-K is dedicated to the transfer operations of industrial wastewater, petroleum contact water (PCW) and contaminated petroleum products through a relatively simple process which recovers petroleum product and then stores the water prior to shipment to a permitted industrial pretreatment facility. S-K processes "used oil" into recycled fuel oil (RFO) for resale as industrial burner fuel. Operations commenced in the first quarter of 2000.

Used oil waste streams that have been approved for acceptance are transported via licensed used oil haulers in bulk. Upon arrival at the S-K facility, a sample is acquired using a coliwasa sampler and analyzed to characterize the waste stream and to meet S-K quality assurance protocols. Analytical parameters for inbound used oil are described in Attachment C.



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Once Quality Assurance protocols are met, each waste stream is unloaded through appropriate lines to the designated storage/treatment tanks for process initiation. Wastewaters are transferred to storage tanks and shipped to a permitted industrial pretreatment facility for treatment and discharge to a Publicly Owned Treatment Works (POTW). All sludges are pumped to the sludge pit area for further dewatering. The remaining solids are solidified via mixing with inert materials to produce a solid waste. The solidified solid waste stream is sampled and analyzed on an annual basis for a hazardous waste determination. The solidified sludges will be disposed of at an EPA-licensed RCRA facility if the waste stream is determined to be a hazardous waste. The liquid removed from these processes are stored on-site and transferred offsite for permitted industrial wastewater pretreatment. Any petroleum product recovered is tested for compliance with the federal used oil regulations found in 40 CFR Part 279 and the federal polychlorinated biphenols regulations found in 40 CFR Part 761.20(e). All petroleum product is sold to end users. The estimated life of the operation is 30 years.

2.2 WASTE CHARACTERISTICS

The facility began treating/storing non-hazardous wastewater and oils the first quarter of 2000. All of the wastewater and used oil received to date has been non-hazardous, non-regulated.

S-K characterizes all waste received at operation according to its waste analyses plan in accordance with Attachment C of this permit. Additionally, the facility may generate CESQG small quantities of hazardous waste through its treatment processes.

2.3 OPERATIONAL HISTORY

The facility has been operational since 2000. S-K assumed ownership of the facility from Atlantic Industrial Services, Inc. during January, 2009.



2.4 UNIT DESCRIPTIONS

2.4.1 TANK SYSTEMS

2.4.1(a) Tanks

All process/storage tanks are constructed of steel. The combined volume of the tanks in the entire tank farm area is approximately 1,221,500 gallons.

2.4.1(b) Secondary Containment Systems

Processing Unit

Situated near the northeast corner of subject site is a used oil processing and dehydration system. The entire system area is in-doors walled on all sides. The floor is constructed of 6-inch thick, reinforced concrete. Concrete berms and sumps exist below the surface level of the foundation. All concrete is sealed. The composition or type of sealer is of epoxy construction. The containment berms are constructed of concrete masonry units and also are sealed to a height of 4-inches above floor level with the same type of sealer mentioned above. The roof cover is metal in this area. The area of the processing units is approximately 12,000 square feet (ft²).

Solid Waste Solidification Area

Situated near the northwest corner of subject site is the storage area. The storage area is outdoors, fenced and/or walled on all sides. The floor is constructed of 8-inch thick reinforced concrete. A concrete berm exists above the surface level of the foundation. All concrete is sealed with an epoxy coating. The containment walls are constructed of solid concrete and also are sealed to a minimum height of 2-ft above floor level with the same type of sealer mentioned above. There is roof cover. The solid waste area will be closed under the solid waste closure plan. The area of the MTFSA is 7,500 ft². Two additional tank-receiving areas were constructed in 2001-2002. The two additional storage tank areas were constructed north and south of the existing MTFSA. The construction was similar to the existing MTFSA. The area of the North Tank Farm (NTF) is approximately 1,890 ft². The area of the South Tank Farm (STFA) is approximately 1,800 ft². The North and South Tank Farm secondary containment areas are connected to the MTFSA. A second area south of the Tank Farm was constructed in 2004. The Southern Tank Farm Area (SNTFA) is approximately 2,448 ft² in size. A



Used Oil/Industrial Waste Water Storage Area of approximately 10,400 ft² was added in 2005.

There exists a warehouse/drum storage area approximately 13,000 ft², located along the south section of the processing plant and is banned itself. The chemical storage area is located within this area and is also situated within the above-mentioned containment:

The entire warehouse is approximately 25,000 ft², which is divided into the drum storage area and the processing unit area.

3.0 CLOSURE PROCEDURES

3.1 GENERAL

S-K will perform a clean closure on all tanks and ancillary piping, and the drum storage area in accordance with the provisions of 40 CFR Part 265, Subpart G, 40 CFR Part 265, Subpart J and F.A.C. 62-762.801. Run-off/run-on will be controlled by the existing secondary containment structures at each unit. It will be disposed of in the same manner as decontamination rinsate as described in the following sections.

3.2 CLEAN CLOSURE PROCEDURES

3.2.1 WASTE CHARACTERIZATOIN

The various waste streams will be characterized using generator knowledge and/or existing laboratory analyses available at the facility as previously described in Attachment C.

Should additional characterization be required, Table I-1 lists the applicable waste characterization analyses that may be required.

3.2.2 TREATMENT/STORAGE TANK/PIPING CLOSURE

This closure procedure is primarily to insure that the tanks and/or ancillary piping are cleaned in accordance with currently accepted practices and federal, state, and local regulations . All tanks, open or closed, shall be cleaned by the same procedures outlined below.



The contents of all tanks and vessels are known and documented including laboratory testing. The facility processes non-hazardous petroleum products.

The remaining contents of all ancillary piping will be purged back into the storage tanks using fresh air or nitrogen. Remaining used oil, fuel oil, marine diesel fuel/used oil will be pumped out by licensed/permitted oil recycler. The tanks will be purged with fresh air (through the manway for closed tanks) to establish a non-hazardous environment.

After the removal of all liquids from the storage tanks, the tanks will be cleaned/decontaminated using the Butterworth[®] tank cleaning system (or equivalent). The rinsate water, degreasing agents and sludges/sediments will be collected transported for offsite disposal at a permitted facility. These wastes are classified as Petroleum Contaminated Water (PCW) based on generator knowledge and will be disposed offsite as such at a permitted facility.

The piping will be cleaned/decontaminated by flushing with water with degreasing agents and this PCW will be disposed as described above. The criteria used to determine if the tank system has been properly decontaminated are:

• No visible residues remain in the piping rinsate or tanks.

The closure assessment of the regulated storage tanks will be completed in accordance with F.A.C. 62-762.801 and the FDEP's "Storage Tank System Closure Assessment Requirements" at the time of used oil permit closure. A closure assessment report will be submitted within 60-days after completion of closure activities.

After cleaning/decontamination procedures are complete, the tanks, piping, and processing equipment will be dismantled and hauled off site for recycling as scrape steel.

3.2.3 CONCRETE TANK PAD CLOSURE

The tank pads and the processing/warehouse pad are visually inspected before and after decontamination for evidence of cracks and spills. If cracks and spillage are identified, additional sampling will be conducted (Section 4.3). The pads are decontaminated using



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a low pressure water rinse and scrub brushing with a degreasing agent compatible with the stored waste stream. The rinsate will be contained by existing curbing and collected and containerized for transportation for offsite disposal at a permitted facility as PCW.

3.2.4 SOLID WASTE MANAGEMENT AREA (SWMA) CLOSURE

The process for the closure of the SWMA will entail the removal and containerization of remaining solidified wastes into roll-off boxes or drums. Upon characterization of the waste as described in Section 3.2.1, the containerized solidified waste will be transported offsite to either a permitted thermal treatment facility (F.A.C. 62-775) or to a Class I landfill (F.A.C. 62-701). The SWMA will be decontaminated by pressure washing with a degreasing agent and containerization of the rinsate for transportation for offsite disposal at a permitted facility as PCW.

3.3 EQUIPMENT DECONTAMINATION

An equipment decontamination staging area will be established at a central location to all units. All equipment used during the closure activities other than sampling equipment, (e.g., brushes, shovels, and tank cleaning equipment) will be decontaminated by steam cleaning with an Alconox wash solution. All rinsate water will be contained by portable berming and collected for disposal as PCW as previously described in the closure procedures.

4.0 CONTINGENCY PLAN

The purpose of this plan is to outline an investigation program to verify that clean closure of the facility has been obtained. The concrete pads underlying the tank systems will be inspected before and after decontamination for evidence of cracks and spills. If cracks and spillage are identified, a soil sample will be collected from beneath the concrete pad(s) at the location of each crack or spillage. If cracks of length greater than 10 ft are found, a soil sample will be collected every 10 ft along the crack. No soil sample will be collected within 10 ft of any other soil sample location.

4.1 CLEAN CLOSURE VERIFICATION

FDEP Storage Tank System Closure Assessment Requirements prescribe that soil sampling is required for areas of visually stained soils. Soil samples should be obtained


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as close to the fill port area as possible or from the "worse case" visually stained soil. For the purpose of obtain clean closure, soil samples will be collected from around each of the tank farm areas and nearest to the former location of the ASTs.

If soil sampling is necessary, a 4-inch core will be mechanically drilled through the concrete containment pad(s) if cracks and visible staining was observed prior containment area cleaning/decontamination procedures described above. A soil sample will then be collected from a depth of 0 to12 inches using a 3.25-inch diameter stainless steel auger. Analytical parameters will be the same as previously listed in closure procedures. A background soil sample will be collected from an area of the facility not affected by facility operations and analyzed for the same parameters. The data that will be used to determine if the soil underlying the concrete pad(s) has been contaminated by used oil will be the analytical results from the soil sample collected from beneath the tank pad(s). The area will be deemed to be clean if the parameters are below FDEP Clean Soil Guidance Criteria as stated in F.A.C. 62-777, except for parameters that are equal to or are lower than the natural background concentration.

If results of analyses of sample collected from beneath the tank and warehouse / processing plant pad(s) indicate concentrations of contaminants above background levels, a soil investigation work plan will be developed and submitted under separate cover, and a soil boring program will be implemented to determine the extent of contamination. The soil investigation work plan will include, but not limited to establishing a grid system and defining sample locations and sampling procedures. Once the extent of contamination, if any is defined, a plan for remediation of contaminated subsoil will be submitted under separate cover.

4.2 SOIL EXCAVATION

The depth of excavations to remove any contaminated soils will be determined by the soil sampling program previously discussed. For the purpose of clean closure, excavations will be made to the depth of the boring at which constituents in the soils are at background levels. Any contaminated soils will be disposed of at an offsite permitted waste management facility.



4.3 SOIL SAMPLING

For soil samples collected from the edges of or beneath the concrete pad. Soil samples will only be collected from beneath the concrete pads if visual staining is observed near an observed crack in the pad. After coring of the concrete at each area to be sampled, a polyethylene sheet will be placed on the pad near the sampling location. For all other soil samples, a polyethylene sheet will be placed on the ground adjacent to the sampling location. All sampling equipment and sample containers will be placed on the sheets when not in use. Soil samples will be collected from a depth of 0-12 inches using a stainless steel 3.25-inch diameter auger bit on a hand held auger. The soil samples will be placed in glass sample containers provided by the contract laboratory. All sample containers will be labeled with the facility name, sampling location, sample identification number and date and time of sample collection. All sample containers will be placed in plastic bags on ice in an insulated cooler. Appropriate chain-of-custody forms will be completed and sent to the analytical laboratory with the samples. All used sampling equipment will be decontaminated on site.

4.4 SAMPLING QUALITY CONTROL PROCEDURES

Soil samples will be collected in accordance with DEP SOP 001/01 FS 3000. Soil sampling locations will be based on the observance of visual staining in accordance with the FDEP Tank Closure Assessment Guidelines. For the purpose of estimating closure assessment costs, it was assumed that up to 20 sampling locations may be required.

• Prior to initiating any soil and groundwater sampling activities, all sampling equipment will be decontaminated using Alconox detergent, potable water, propanol, deionized water and wrapped in plastic bags to reduce the potential for contamination prior to use. Groundwater sampling will be conducted using dedicated unused polypropylene tubing. Latex gloves will be worn by all sampling personnel during sampling activities and changed between each sampling location to prevent cross contamination. All sample containers will be obtained from the laboratory providing the analytical services. All sample containers will be placed in sealed plastic bags, on ice, in an insulated cooler prior



4.6 GROUNDWATER SAMPLING

Groundwater samples will be collected in accordance with DEP SOP001/01 FS 2200. Groundwater will be sampled at locations to be determined based on soil sampling described above. At least one monitoring well will be placed at the point of highest soil contamination, or the monitoring well will be placed upgradient for background data and monitoring wells will be placed down gradient. Groundwater samples will be obtained from each well using a peristaltic pump for low flow purging as a quiescent sampling method. The groundwater samples will be analyzed for parameters listed in Table I-1 The analytical parameter list may also be modified to reflect changes in city, state or federal law. Groundwater will be assessed to define a contaminant plume should one be identified. The groundwater assessment will be completed in accordance with FDEP Tank Closure Assessment Guidelines.

5.0 CLOSURE COST ESTIMATE

The cost estimate to complete the closure activities is presented in Enclosure (1). The estimate is based on clean closure of each unit. The tank and concrete pad decontamination will be performed by a professional tank cleaning service and continually monitored by a professional engineer's (P.E.) representative. The P.E. will make periodic site inspections for collecting samples and verifying the decontamination procedures. A final closure report will be prepared by the engineer's representative and certified by the P.E. The total cost to perform the closure activities is estimated at \$432,428.81, as revised. This cost estimate also includes soil sampling and analyses as described in Section 4.0, Contingency Plan.



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Table I-1 Oil Storage

<u>Tank</u> <u>Number</u>	<u>Tank Capacity</u> (G)	Tank Contents	Location Onsite	Installation Date
			Main Tank Farm Containment	
1	30,000	Used Oil	Area	December, 1999
2	30,000	Used Oil	Main Tank Farm Containment Area	December, 1999
3	30,000	Used Oil	Main Tank Farm Containment Area	December, 1999
4	30,000	Used Oil	Main Tank Farm Containment Area	December, 1999
5	30,000	Used Oil	Main Tank Farm Containment Area	December, 1999
6	30,000	Used Oil	Main Tank Farm Containment Area	December, 1999
7	30,000	Used Oil	Main Tank Farm Containment Area	December, 1999
8	30,000	Used Oil	Main Tank Farm Containment Area	December, 1999
9	30,000	Used Oil	Main Tank Farm Containment Area	December, 1999
10	30,000	Used Oil	Main Tank Farm Containment Area	December, 1999
11	30,000	Used Oil	Main Tank Farm Containment Area	December, 1999
12	30,000	Used Oil	Main Tank Farm Containment Area	December, 1999
13	30,000	Used Oil	Main Tank Farm Containment Area	December, 1999
14	30,000	Used Oil	Main Tank Farm Containment Area	December, 1999
15	30,000	Used Oil	Main Tank Farm Containment Area	December, 1999
16	30,000	Used Oil	Main Tank Farm Containment Area	December, 1999
17	20,000	Industrial Wastewater	South Tank Farm Containment Area	2001
18	20,000	Industrial Wastewater	South Tank Farm Containment Area	2001
19	20,000	Industrial Wastewater	South Tank Farm Containment Area	2001
20	20,000	Industrial Wastewater	North Tank Farm Containment Area	2002
21	20,000	Industrial Wastewater	North Tank Farm Containment Area	2002
22	20,000	Used Antifreeze	North Tank Farm Containment Area	2002
23	20,000	Industrial Wastewater	North Tank Farm Containment Area	2002
24	30,000	Used Oil	Southern Tank Farm Containment Area	2003



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Table I-1 Oil Storage

<u>Tank</u> Number	Tank Capacity (G)	Tank Contents	Location Onsite	Installation Date
			Southern Tank Farm	
25	30,000	Used Oil	Containment Area	2003
			Southern Tank Farm	
26	30,000	Used Oil	Containment Area	2003
			Southern Tank Farm	
27	30,000	Used Oil	Containment Area	2003
			Southern Tank Farm	
28	30,000	Used Oil	Containment Area	2003
			Southern Tank Farm	
29	30,000	Used Oil	Containment Area	2003
			Southern Tank Farm	
30	30,000	Used Oil	Containment Area	2003
			Southern Tank Farm	
31	30,000	Used Oil	Containment Area	2003
32	13,000	Fuel Oil	Warehouse Building	December, 1999
33	2,700	Fuel Oil	Warehouse Building	December, 1999
34	2,700	Fuel Oil	Warehouse Building	December, 1999
35	6,500	Used Oil	Warehouse Building	December, 1999
36	3,000	Fuel Oil	Warehouse Building	December, 1999
27	1 000	Processor/dehydrator	Morehouse Duilding	December 1000
37	1,000	#3	Warehouse Building	December, 1999
38	6,000	Low Flash Recovery	Warehouse Building	December, 1999
20	6 000	Recovered Process	Warehouse Building	December 1000
39	6,000	VValer	Warehouse Building	December, 1999
40	0,000	LOW FIDSIT RECOVERY		December, 1999
41	110		Warehouse Building	December, 1999
42	12,000	Hot Gas Generator	Warehouse Building	December, 1999
45	6.000			December, 1999
44	6,000	LOW Flash Recovery	Warehouse Building	December, 1999
45	1,000 6,000	Eucl Oil Minoral Oil	Warehouse Building	December, 1999
40	6,000	Fuel OII Milleral OII	Warehouse Building	December, 1999
47	1,000	Empty	Warehouse Building	December, 1999
40	500 6.000		Warehouse Building	December, 1999
49	0,000	LOW FIDSIT RECOVERY	Knockout Storage Area	December, 1999
50	2,000	Knockout Tank	Knockout Storage Area	December, 1999
51	1,000	Knockout Tank	Knockout Storage Area	December, 1999
52	300		Courte containment Area	December, 1999
53	159,000	Used OII	Southeast Containment Area	2005
54	129,000	industrial wastewater	Southeast Containment Area	2005
	0.400	Stormwator	North Tank Farm Containment	December 1000
55	9,400	Stormwater	Area	December, 1999
FC	14 100	Ctormuster	South Tank Farm Containment	2001
50	14,100	Stormwater	Area	2001
F 7	1 100	Off road Discol Furt	South Tank Farm Containment	2001
57	1,100	Off-road Diesel Fuel	Area	2001



6.0 CLOSURE SCHEDULE

The sequence for closing the individual tanks will be determined by the P.E. All nonhazardous and identified hazardous wastes will be disposed of within 90 days after approval of the closure plan or within 90 days of the hazardous waste accumulation start date for each container. The FDEP will be notified 60 days prior to initiating closure activities. The clean closure will be completed within 180 days of commencing work.

7.0 CLOSURE CERTIFICATION

Site visits will be conducted by an independent registered professional engineer or engineer's representative during the closure activities. The engineer will verify that wastes have been removed, tanks and pads have been cleaned, and samples have been collected and analyzed for the appropriate analytes. The engineer will be responsible for collecting any soil samples and evaluating/validating all analytical data.

8.0 FINANCIAL ASSURANCE

Financial Assurance is required for the purpose of this closure plan in accordance with Florida Administrative Code (F.A.C.) 62-710.800(6). This plan is submitted to the FDEP/EPA for the sole purpose of obtaining a used oil-processing permit and, in conjunction, to meet the requirements of a designated facility for PCW as defined in Chapter 62-740, F.A.C.



ATTACHMENT I-1 COST ESTIMATE

Table I-2. Safety-Kleen Systems, Inc. Ocala Used Oil Processing Facility

Waste Characterization Laboratory Sampling

Solid Waste	•	
Thermal Treatment	Method No.	Allowable Limit
TCLP Aresnic	1311/7060	5.0 mg/L
TCLP Barium	1311/7080	100.0 mg/L
TCLP Cadmium	1311/7131	1.0 ma/L
TCLP Chromium	1311/7191	5.0 ma/L
TCLP Lead	1311/7421	5.0 ma/L
TCLP Mercury	1311/7471	0.2 ma/L
TCLP Selenium	1311/7740	1.0 ma/L
TCLP Silver	1311/7761	5.0 ma/l
TCLP Volatiles	1311/624/8260	Refer to 40 CFR 261.24
Total Organic Halides	1311/624/8260	Refer to 40 CFR 261.24
TCLP PCBs	1311/8082	50 ma/L
TPH	FL-PRO	n/a
Solid Waste		
Landfill	<u>Method No.</u>	<u>Allowable Limit</u>
TCLP Aresnic	1311/7060	5.0 mg/L
TCLP Barium	1311/7080	100.0 mg/L
TCLP Cadmium	1311/7131	1.0 mg/L
TCLP Chromium	1311/7191	5.0 mg/L
TCLP Lead	1311/7421	5.0 mg/L
TCLP Mercury	1311/7471	0.2 mg/L
TCLP Selenium	1311/7740	1.0 mg/L
TCLP Silver	1311/7761	5.0 mg/l
TCLP Volatiles	1311/624/8260	Refer to 40 CFR 261.24
Closure Assessment		
Soil	Method No.	Allowable Limit
Volatile Organics	8260	Refer to Chapter 62-777 F.A.C.
Semivolatile Organics	8270	Refer to Chapter 62-777 F.A.C.
TRPHs	FL-PRO	Refer to Chapter 62-777 F.A.C.
Arsenic	6010	Refer to Chapter 62-777 F.A.C.
Cadmium	6010	Refer to Chapter 62-777 F.A.C.
Chromium	6010	Refer to Chapter 62-777 F.A.C.
Lead	6010	Refer to Chapter 62-777 F.A.C.
PCBs	8080/8270	Refer to Chapter 62-777 F.A.C.
Groundwater	Method No.	Allowable Limit
Volatile Organics	8260	Refer to Chapter 62-777 F.A.C.
Semivolatile Organics	8270	Refer to Chapter 62-777 F A C
TRPHs	FL-PRO	Refer to Chapter 62-777 F.A.C.
Arsenic	6010	Refer to Chapter 62-777 F.A.C.
Cadmium	6010	Refer to Chapter 62-777 F A C
Chromium	6010	Refer to Chapter 62-777 F A C
Lead	6010	Refer to Chapter 62-777 F A C
PCBs	8080/8270	Refer to Chapter 62-777 $F \land C$

Source: Millennium Laboratory, ECT 2012.

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Table I-2. Safety-Kleen Systems, Inc. Ocala Used Oil Processing FacilityWaste Characterization Laboratory Sampling

<u>Used Oil</u>		
<u>Parameters</u>	Method No.	Allowable Limit
Flash Point	1010/1030	>140 F (>60 C)
% Water		(
Arsenic	1311/7060	5.0 ma/L
Barium	1311/7080	100.0 mg/L
Cadmium	1311/7131	1.0 mg/L
Chromium	1311/7191	5.0 ma/L
Lead	1311/7421	5.0 mg/l
Total Chlorine (Halogens)	1311/624/8260	Refer to 40 CER 261 24
Total Sulfur	9075	Refer to 40 CER 261 24
PCB	8082	Refer to 40 CFR 261 24
Wash Water/PCW		
<u>Parameters</u>	Method No.	Allowable Limit
Flash Point	1010/1030	>140 F (>60 C)
рН	150.1	>2 or < 12.5
Arsenic	1311/7060	5.0 mg/L
Barium	1311/7080	100.0 mg/L
Cadmium	1311/7131	1.0 mg/L
Chromium	1311/7191	5.0 mg/L
Lead	1311/7421	5.0 mg/L
Mercury	1311/7471	0.2 mg/L
Selenium	1311/7740	1.0 mg/L
Silver	1311/7761	5.0 mg/l
Benzene	1311/624/8260	0.5 mg/L
<u>Sludges</u>		
<u>Parameters</u>	Method No.	<u>Allowable Limit</u>
TCLP Aresnic	1311/7060	5.0 mg/L
TCLP Barium	1311/7080	100.0 mg/L
TCLP Cadmium	1311/7131	1.0 mg/L
TCLP Chromium	1311/7191	5.0 mg/L
TCLP Lead	1311/7421	5.0 mg/L
TCLP Mercury	1311/7471	0.2 mg/L
TCLP Selenium	1311/7740	1.0 mg/L
TCLP Silver	1311/7761	5.0 mg/l
TCLP Volatiles	1311/624/8260	Refer to 40 CFR 261.24
TCLP Semivolaties	1311/625/8270	Refer to 40 CFR 261.24
TCLP Pesticides	1311/608/8081	Refer to 40 CFR 261.24
TCLP Herbicides	1311/615/8321	Refer to 40 CFR 261.24

Table I-3. Safety-Kleen Systems, Inc. Ocala Used Oil Processing Facility Estimated Cost for Closure

Task 1.a.	Used Oil Tanks, Containers, Piping, Equipment and Secondary Containment Decontamination	\$201,080.00
	Waste Characterization Disposal	Incl. 1.b, 1.c, 1.e \$21,500.00
Task 1.b.	Wash Water Waste Characterization Disposal	\$4,893.00 \$86,353.39
Task 1.c.	Sludge/Sediment Waste Characterization Disposal	\$6,333.00 \$2,528.31
Task 1.d.	Used Oil filter Waste Characterization Disposal	\$3,013.00 \$6,990.00
Task 1.e.	PCW Waste Characterization Dispoal	\$1,773.00 \$3,964.45
Task 1.f.	Mobilization \$1,875.00) Incl in other tasks
Task 1.g.	Solid Waste Management Area Dispoal	\$6,918.00 \$5,397.95
	Subtotal (1) Decontamination/Disposal	\$350,744.10
Task 2.a.	Enginerring Closure Sampling & Analyses	\$32,755.00
Task 2.b.	Closure Certification Report	\$9,618.00
Sub-Total		\$393,117.10
Task 3	Contingency (10%)	\$39,311.71
Total Closure Cost E	stimate	\$432,428.81

Table I-4. Facility Closure Cost Estimate Worksheet

Site Name: Safety-Kleen Systems, Inc. Ocala

Task Description: Site Closure Date: May 1, 2012

Subtask A Waste Characterization-Tanks, Containers, Piping, Containment Subtask A Waste Characterization-Washwater Waste Subtask C Waste Characterization-Suldges/Sediment Waste Subtask D Waste Characterization-Used Oil Filter Management Subtask E PCW Waste Unit Characterization Subtask F Solid Waste Unit Characterization Subtask A Closure Plan Sampling Analysis and Assessment Subtask H Closure Certification Report

Labor Category	Hourly Rate	Å	8	U	٩		Ľ	9		Totals
Administrative Support	\$52	~		-					14	16
Graphics/Drafting	\$69	4							2	14
Field Technician	\$63	1.1. m	Ċ	e	. 3	e		24		36
Senior Technician	\$75	120	3	3	3	æ	24	24		180
GIS Specialist Senior GIS Specialist	\$65 \$105									0
Associate Engineer/Scientist I Associate Engineer/Scientist I	\$85 \$92									
Sr. Associate Eng/Scientist I Sr. Associate Eng/Scientist II	\$105 \$109									
Staff Engineer/Scientist Staff Engineer/Scientist	\$118 \$127	20								, 0
Sr. Engineer/Scientist	\$138	1				n an				3 C
Sr. Engineer/Scientist II	\$147	20					8	10	8	72
Principal Engineer/Scientist	\$162	10	1	1	1	1	+	4	20	39
TOTAL HOURS		176	8	8	8	8	33	62	74	377
SUBTOTAL LABOR		16,480.00	723.00	723.00	723.00	723.00	3,138.00	5,430.00	9,068.00	\$37,008.00
Equipment Rental(core drill, sam	pling equip	150.00	215.00	75.00	75.00	75.00	75.00	675.00		\$1,200.00
Vehicle Rental Field Truck		1,125.00	75.00	75.00	75.00	75.00	225.00	225.00		\$0.00 \$1,875.00
Travel (per diem) Other Direct Costs		525.00	120.00	120.00	120.00	120.00	120.00	125.00	550.00	\$0.00 \$1,800.00
SUBTOTAL ODCS		1,800.00	270.00	270.00	270.00	270.00	420.00	1,025.00	550.00	\$4,875.00
Laboratory Analysis Waste Disposal		21,500.00	3,900.00 86,353.39	5,340.00 2,528.31	2,020.00 6,990.00	780.00 3,964.45	3,360.00	18,800.00 1.000.00		\$34,200.00 \$127.734.10
Monitoring Well Drilling Decommission/Clean Intrastructu	en en	182,800.00					Incl. in Task A	7,500.00		\$7,500.00 \$182,800.00
										\$0.00
SUBTOTAL SUBCONTRACI	TOR	204,300.00	90,253.39	7,868.31	9,010.00	4,744.45	8,757.95	27,300.00	0.00	\$352,234.10
Markup										\$0.00
Total Subtask Cost		\$222,580.00	\$91,246.39	\$8,861.31	\$10,003.00	\$5,737.45	\$12,315.95	\$33,755.00	\$9,618.00	\$394,117.10
Total Subtask Cost w/o Disk	posal	\$201,080.00	\$4,893.00	\$6,333.00	\$3,013.00	\$1,773.00	\$6,918.00	\$32,755.00	\$9,618.00	\$266,383.00

Copy of SK-Ocala-Cost-Est.xiShoerroeninfa0a 2012

Table I-5. Safety-Kleen Systems, Inc. Ocala Used Oli Processing Facility (Revised)

Volume Estimates Tanks/Piping/Containment/Processing/Storage Areas				
All storage tanks/process tanks/transformers, etc .				
Tanks		Total Storage		
Assumptions		Capacity (gallons)	Radius	Square Footage
All storage tanks volumes to be converted to square footage.		1,264,155	54.67	23,931
To calculate internal square footage, assume one tank is 18 feet tall.				
Secondary Containment Square ft	sa ft			
Processing Unit	12.000			
Main Tank Farm Storage Area	7.500			
Addition 2001-2002	1.890			
Addition 2004	2,448			
New Used Oil/IWW Storage Area-2007	10.400			
Drum/Sludge Warehouse	10,000			
Rail Tank Loading/Unloading	1,440			
Solid Waste Management Unit NW	2.000			
Total Secondary Containment Area Sq Ft	47,67 8			
Piping square ft estimate	1.500			
All tanks square ft estimate from above	23,931			
Total Containment/Piping Estimated Square Footage from above	25,431			
Total Estimated Square Footage for Cleaning	73,109 sq ft			
Decontamination Wastes (PCW) of Above so ft				
Assume 0.8 gal/sg ft	58 487 gallone			
Unit Transportation/Disposal/gal	\$0.35			
Disposal	\$20 470 43			
Waste Characterization Samples: assume 10 samples @ \$195/ea.	\$1,950.00			
industrial Waste Water (Wash Water)				
Storage capacity of 299 468-gallons	200 469 collops			
Unit Transportation/Disposal/gal	\$0.22			
Disposal	\$65,882,96			
Waste Characterization Samples: assume 10 samples @ \$195/ea.	\$1,950.00			
Sludge/Sediment Wastes				
Assume 0.5% volume sludge for total capacity	6 331 college			
Assume weight of sludge is 8 nounds per gallon	50 566 nounde			
Pounds to tons	25 28 tons			
Transportation/Disposal/ton	\$100.00			
Total	\$2,528,31			
Waste Characterization Samples: assume 6 samples @ \$890/ea.	\$5,340.00			
lised Oil Filter Waste Characterization				
Assume 200: 55-gallon drums @ \$75/drum	\$1.650.00			
Assume 3 rolloff boxes @ \$1 780/load	\$5,000.00			
Waste Characterization Samples: assume 4 samples @ \$505/ea.	\$2,020.00			
DCN/ Wests Characterization				
Form mayle characterization	14 007			
	11,327			
Disposal	\$0.35			
Waste Characterization Samples: assume 4 samples @ \$195/ea.	\$3,964.45 \$780.00			
Sono waste management Area Closure 20-55 gallon doums	20 aaab			
Transportation/Disposal/drum	\$100.00			
Disposal	\$2,000,00			
30.204-gallons solidified	30 204 callon			
Assume 9 pounds per gallon	271,836 pounde			
Assume 8 roll off boxes	135 9 tone			
Transportation/Disposal/ton	\$25.00			
Disposal	\$3.397.95			
Total Disposal	\$5,397,95			
Waste Characterization Samples: assume 6 samples @ \$560/ea.	\$3,360.00			
· · · · · · · · · · · · · · · · · · ·	*-,**			

Source: Safety-Kleen Systems, ECT 2012.

ATTACHMENT J

EMPLOYEE TRAINING Revised 05/01/12



USED OIL TRANSPORTER STAFF TRAINING -FLORIDA

All S-K Used oil transporters and facility staff receive customized training by S-K's regional EHS Manager or his/her designee. Training is conducted on an annual basis. Training topics covered include, but are not necessarily limited to:

- Federal, state and local rules regulating used oil;
- RCRA Regulations, and yearly RCRA refresher course.
- SK-developed and implemented facility practices and spill/release response procedures;
- Facility-specific procedures as specifically defined in the facility SPCC Plan.
- Operating procedures for halogen screening during pickups; and
- New Employee introductory training, if required.

All new employees are trained as soon as practicable and no later than 90 days after the beginning of their employment with S-K. Training records of employees are generally maintained by the Environmental Health and Safety Manager and the respective facility manager to which the employee reports.

The following Attachment is representative of the training content delivered to S-K's affected employees.