

Jeb Bush Governor

Department of Environmental Protection

Southwest District 13051 North Telecom Parkway Temple Terrace, FL 33637-0926 Telephone: 813-632-7600

Colleen M. Castille Secretary

CERTIFIED MAIL 7004 1350 0002 5571 4480 RETURN RECEIPT REQUESTED

December 6, 2006

Aqua Clean Environmental Co., Inc. PO Box 7183 Lakeland, Fl. 33807

Re:

September 12, 2006 Multimedia Inspection

Aqua Clean Industrial Wastewater pretreatment facility

3210 Whitten Road, Lakeland, Florida

Dear Mr. Miller:

Thank-you for your assistance during the Department's multimedia inspection of the above-referenced facility on September 12, 2006. Following are comments and/or recommendations provided by each program area. These are also included in more detail in the inspection reports enclosed. Please feel free to contact the respective inspector if you have specific questions on any of the comments and/or recommendations provided.

Solid Waste Program:

The following solid waste compliance issues should be addressed:

Repair containment structures around solidification area (walls, curbs).

Status: Based on photographs provided to the Department at a meeting on October 17, 2006, this issues appears to have been corrected.

2. Remove all stained soils in the vicinity of the solidification area (on the south and east sides). Characterize the materials and provide analytical results to the Department.

Status: Based on the discussions during the meeting on October 17, 2006, Aqua Clean has removed the impacted soils for disposal with other solid wastes. Analytical results for the impacted soils and confirmation of the disposal location have not been received by the Department.

 Conduct confirmatory sampling on the remaining soils to demonstrate that all impacted soils have been removed. Submit analytical results to the Department.

Status: The analytical results of the confirmatory soil sampling have not been received by the Department to date.

Inserted into OCULUS

MAY 1 5 2012

Initials:

"More Protection, Less Process"

Printed on recycled paper.

4. Provide copies of analyticals for Cedar Trail landfill leachate.

Status: This information was received via email from Fowler, White on October 16, 2006. No further information is requested for this item.

Hazardous Waste Program:

The following minor compliance issue should be addressed:

1. The chain of custody forms for the Total Characteristic Leaching Procedures (TCLP) testing of outgoing materials did not always include both the date and time of sampling as well as the date and time of transfer to the lab. Samplers are required to note this data in accordance with Department SOP FD 5000 and FAC Rule 62-160.210(1).

Status: Ongoing. This was reviewed with Mr. Miller during the inspection, and he agreed to record this information for future samples.

Industrial Wastewater Program:

At the time of the inspection it did not appear that the facility requires an Industrial Wastewater Permit, since the industrial wastewater generated is being disposed of at the City of Lakeland Glendale Wastewater Treatment Plant. However, based on the findings of the inspection it appears that the facility requires coverage under the Multi-Sector Generic Permit for Stormwater Discharge Associated with Industrial Activity (MSGP). As part of obtaining coverage under the MSGP, Aqua Clean will be required to develop and implement a Stormwater Pollution Prevention Plan (SWPPP), which will address the compliance issues observed during the inspection related to stormwater.

Status: The facility has been referred to the NPDES Stormwater Program to address the issue of obtaining coverage under the MSGP. Aqua Clean indicated to the Department on November 20, 2006 that they will submit a Notice of Intent for coverage under the MSGP within 30 days.

Contact: Fred Noble, FDEP NPDES Stormwater, Tallahassee Steven Michael Kelly, FDEP NPDES Stormwater, Tallahassee

Air Program:

After internal discussion within the Southwest District's Air Resource Management Section, the Department has determined that additional information will be required to determine a starting point for a permit determination.

Upcoming Deliverables:

1. Define incoming waste stream quantity and customers served.

a. In an effort to determine the type of wastestreams treated by Aqua Clean, the Department will require the identification of all the clients from which Aqua Clean received shipments in the last six (6) months.

b. In addition; the Department will also require the respective quantities Aqua Clean has received from each of these clients. For example, if Aqua Clean received landfill leachate from Polk North Central County Landfill, the Department is requesting that Polk North Central County Landfill be listed and the total amount of leachate that was received over the six months be listed with it. Aqua Clean is not required to list each individual delivery of leachate and the corresponding quantity received.

- 2. Define where Aqua Clean sends certain incoming waste streams for treatment.
 - a: Aqua Clean is requested to identify the unloading location at the Aqua Clean facility where the indicated shipment was received. That is, if landfill leachate was received and then was unloaded to the leachate tanks (list "leachate tanks" next to appropriate shipment); if carwash wastewater was received, and it was unloaded to the petroleum contact water (PCW) tanks (list "PCW tanks"); etc.
- 3. Other than the seven tanks [three (3) black (PCW and misc.) and four (4) white (leachate tanks)], give an explanation and/or description of any other process that emits air pollution.
- 4. Based on Item Nos. 1 through 3 above, submit emission calculations to show that emissions on a tons/year basis are less than the values listed in Rule 62-210.300(3)(b). F.A.C.

This information will be used to determine what analytical parameters, the sampling methods, and location requirements will be requested. The requested time frame for the above listed information is the six-month period from May 1, 2006 to October 31, 2006. In addition, please be reminded that all calculations relating to air emissions must be signed and sealed by the registered professional engineer who prepared them.

Status: Incomplete at this time.

If any of the comments and/or recommendations included in this cover letter and/or enclosed inspection reports are requesting a response or sampling analysis results, please submit such response directly to the contact for the respective program within fifteen (15) days from receipt of this letter. If you have any questions you may call me at (813) 632-7600, extension 339.

Sincerely

Deborah A. Getzo District Director

Southwest District

DAG/sjp Enclosures

cc: Ron Noble, Esq., Fowler & White, 501 E. Kennedy Blvd., Ste. 1700, Tampa, Fl. 33602
Arthur Lieberman, Hazardous Waste Specialist, Polk County Recycling Division, 50 Environmental

Loop, Winter Haven, FL 33880
Chris McGuire, Esq., FDEP OGC
Richard Tedder, P.E., FDEP Tallahassee
I M. Farley, Assistant District Director, FDE

J.M. Farley, Assistant District Director, FDEP Tampa
William Kutash, FDEP Tampa, Waste Program Administrator
Mara Nasca, FDEP Tampa, Air Program Administrator
Jim Dregne/Beth Knauss, FDEP Tampa – RCRA Manager
Yanisa Angulo, P.E., FDEP Tampa – IW Manager
Pamala Vazquez, Exteral Affairs Manager, FDEP Tampa
Steven Michael Kelly, FDEP NPDES Stormwater
Fred Noble, FDEP NPDES Stormwater



jeb Bush Governor

Department of Environmental Protection

Southwest District 13051 North Telecom Parkway Temple Terrace, FL 33637-0926 Telephone: 813-632-7600

Colleen M. Castille Secretary

SITE INSPECTION REPORT

OWNER/OPERATOR:

Mr. W. D. "Dee" Miller, (Aqua Clean)

MAILING ADDRESS:

PO Box 7183

Lakeland, Fl. 33807

NAME OF SITE:

Aqua Clean Industrial Wastewater

processing facility

SITE ADDRESS:

3210 Whitten Road

CITY:

Lakeland, Fl

INSPECTION

DATE: September 12, 2006

PERMIT NO: none

REASON FOR VISIT:

COMPLAINT INVESTIGATION

PERSONS PRESENT: Susan Pelz, Beth Knauss, Bret Galbraith, Ilia Balcom (FDEP); Dee Miller (Aqua Clean)

SUMMARY REPORT:

The purpose of this inspection was to investigate a complaint that the facility was causing objectionable odors and also to ascertain if the operation includes solid waste management that requires a Department permit.

Department staff met Mr. Miller at the office. We explained that the Department had received complaints about the facility, and we were there to inspect the facility as a result of the complaints. We informed Mr. Miller that we would be taking photographs, and he objected. We provided him with a copy of an inspection warrant that we had obtained for the inspection. The warrant authorized us to take photographs. Mr. Miller requested that we provide him with copies of the photographs taken during the inspection (we provided a CD with the photographs on October 4, 2006).

Mr. Miller accompanied us on the inspection. We walked in the south portion of the site to the "solidification" area (Photo #1). Drainage was observed discharging from the plant to the solidification area (Photo #2). It appears that this discharge was contained within the curbed paved area. Sludge from the wastewater pretreatment process is discharged to the solidification area where it is mixed with sawdust (Photo #3) and then loaded into trucks for offsite disposal. The current disposal facility is Omni Waste in Holopaw. At the time of the inspection, Aqua Clean had not been able to load all of the previous day's treated waste. The northern half of the pad was being used to solidify additional waste. The previous day's waste had been moved too close to the southern curb of the pad, and waste had spilled over the wall onto the pavement outside the pad. Solidified sludge and seepage was observed discharged outside the solidification area walls (Photos #5 and #6). Cracks were also observed in a couple of locations in the wall and seepage through the wall was observed. At the east of the solidification area, it appeared that the containment curb had been damaged and containment for the liquids within the area were not contained. Discharges to a low area (Photos #7 and #9) outside of the containment area were observed. This area appeared to have experienced discharges other than during the inspection since discolored soils were observed trending toward the stormwater pond (Photo #8), but liquids were observed adjacent to the solidification area (Photos #7, #9, #10, #11).



As we went to the south portion of the site, dark staining was observed on the parking lot between the plant and the "large processing tanks" (leachate tanks). Mr. Miller indicated that this area is non-contact stormwater and discharges to the catch basin (Photo #14), which then discharges to the stormwater pond (Photo #13) that eventually discharges offsite to the south. The catch basin was being aerated during the inspection. We inspected the area around the leachate tanks. Liquids were observed discharging from under the tanks in some areas into the containment area (Photos #15, #16, #17, #18). The east stormwater pond was observed. A sheen was observed on the pond surface. As we walked along the north truck loadout area, discharge was observed outside the north wall (Photo #12).

After the physical inspection, Mr. Miller accompanied us back to the office and assisted us with paperwork review. The facility received leachate from solid waste landfills (David Joseph-Hillsborough County and Cedar Trail LF in Polk County). Mr. Miller indicated that the 4-large processing tanks were mostly used to store and process leachate (80% of contents is leachate). I requested leachate characterization for each of the landfills. The Cedar Trail profile stated "see analytical," but no analyticals were located at the time of the inspection.

Aqua Clean continues to register as a used oil transporter in order to retain eligibility to transport petroleum contact water. The company does not transport or process used oil, only PCW and non-hazardous oily waste water. Aqua Clean often relies on past waste water characterizations or generator certifications rather than an actual analysis for purposes of waste characterization. This is not impermissible under the facility's Clean Water Act pretreatment permit. Aqua Clean has not changed its waste water treatment process since the previous inspection. The number of tanks and tank layout are also the same. Since the previous inspection, the facility has installed permanent plastic piping to replace the flexible hoses that were previously used to transfer waste water from the large white tanks to the treatment system tanks. In addition, the facility has added stations to allow additional tankers to unload at the same time.

Aqua Clean filed its annual report for 2005 petroleum contact water recovery before March 1, 2006. In 2005, Aqua Clean accepted over 1,300,000 gallons of PCW, and recovered approximately 12,000 gallons of petroleum. At the time of the inspection, the recovered petroleum tank contained approximately 11 ft. of product. Aqua Clean disposes of recovered product through On Time Environmental and/or PetroTech. Outgoing shipping records were reviewed, and no violations were noted.

Aqua Clean continues to use wood chips to solidify sludges removed from the treatment system. Aqua Clean continues to sample the treated waste monthly for TC toxicity. The waste is analyzed for metals and VOCs, and all samples were non-hazardous. The previous 6 months' data showed detections for a number of metals, and for benzene, perchloroethylene and trichloromethane. The highest detection with respect to the TCLP limit was for 0.297 mg/l benzene in April. The standard is 0.5 mg/l. Mr. Miller stated that he collects the samples and holds them in a cooler on ice until he delivers them to the lab. The chain of custody forms did not always include both the date and time of sampling as well as the date and time of transfer to the lab. Samplers are required to note this data in accordance with Department SOP FD 5000 and Rule 62-160.210(1), F.A.C. This was reviewed with Mr. Miller during the inspection, and he agreed to record this information for future samples.

DEFICIENCIES:

- Discharges of solid waste from the solidification area, through cracks in the containment, material overtopping the containment wall, and lack of containment on the east side.
- Analysis of Cedar Trail leachate could not be located during the inspection. 2.
- The chain of custody forms for TCLP analysis of outgoing materials did not always include both the date. and time of sampling as well as the date and time of transfer to the lab. Samplers are required to note this data in accordance with Department SOP FD 5000 and FAC Rule 62-160.210(1).

RECOMMENDATIONS:

The facility should perform the following activities to demonstrate compliance with Department rules:

- 1. Repair containment structures around solidification area (walls, curbs).
- 2. Remove all stained soils in the vicinity of the solidification area (on the south and east sides). Characterize the materials and provide analytical results to the Department.
- 3. Conduct confirmatory sampling on the remaining soils to demonstrate that all impacted soils have been removed. Submit analytical results to the Department.
- 4. Provide copies of analyticals for Cedar Trail landfill leachate.
- 5. Include date and time of sampling as well as the date and time of transfer to the lab and transfer of custody for future TCLP samples.

Follow-up

As discussed with the facility's attorney, Mr. Ron Noble, via telephone on September 13 and 14, 2006, the facility operator agreed to recommendations #1, #2 and #3 above, will analyze the confirmatory samples for RCRA 8 metals, TRPH and VOCs, and will provide a figure with the sampling locations for the Department's concurrence prior to conducting the sampling. This figure was provided via email on October 16, 2006, and was discussed with Aqua Clean in a meeting on October 17, 2006. On October 18, 2006, a sketch with revised soil sampling locations was emailed to Mr. Noble. To date, the results of the confirmatory soil sampling have not been received.

FDEP REPRESENTATIVE:

Susan J. Pelz, P.E.

Solid Waste Program Manager

Date Mailed to Facility

Elizabeth Knauss

Environmental Manager, RCRA Compliance

cc: Ron Noble, Esq., Fowler & White, 501 E. Kennedy Blvd., Ste. 1700, Tampa, Fl. 33602

Chris McGuire, Esq., FDEP OGC

Richard Tedder, P.B., FDEP Tallahassee

Deborah A. Getzoff, District Director, FDEP Tampa

J.M. Farley, Assistant District Director, FDEP Tampa

Pamala Vazquez, FDEP Tampa

William Kutash, FDEP Tampa, Waste Program Administrator

Mara Nasca, FDEP Tampa, Air Program Administrator

Jeff Greenwell, P.B., FDEP Tampa, Water Facilities Administrator

Jim Dregne/Beth Knauss, FDEP Tampa - RCRA

Yanisa Angulo, P.B., FDEP Tampa - IW



Photo #1: Sludge "solidification" area



Photo #2: Drainage from plant to "solidification" area

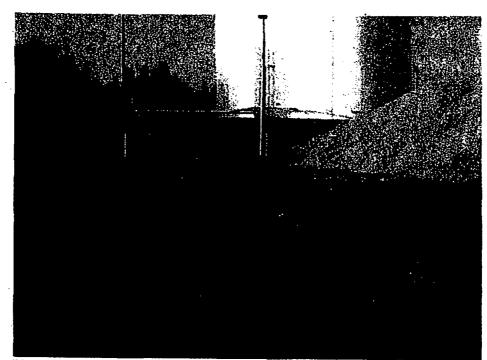


Photo #3: Looking south- leachate tank in background, sawdust used for solidification

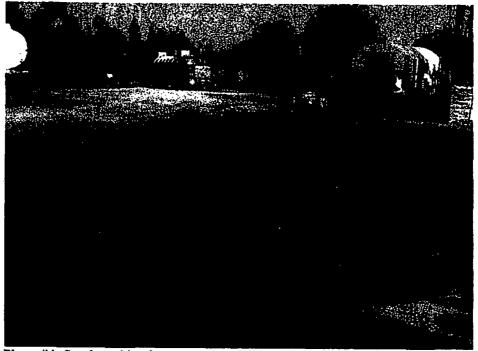


Photo #4: South parking lot, west of "solidification" area.

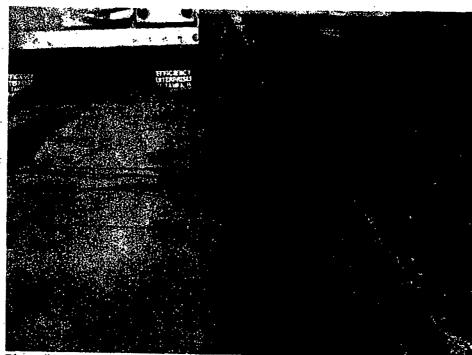


Photo #5: Discharge of solidified sludge outside of containment area

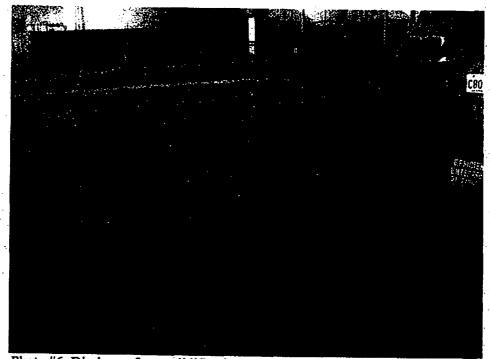


Photo #6: Discharge from solidification area, draining toward stormwater pond



Photo #7: Discharge to area east of solidification area, no containment observed

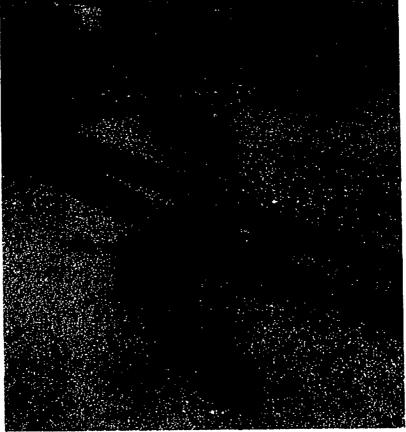


Photo #8: Discharge to area east of solidification area, no containment observed

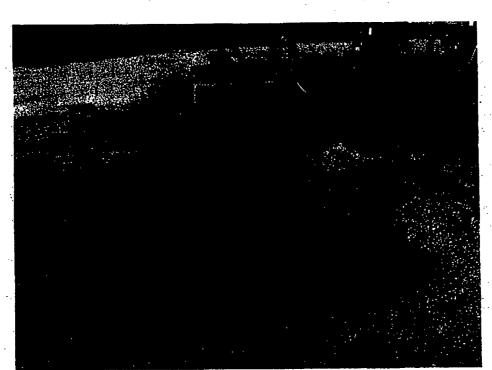


Photo #9: Discharge to area east of solidification area, no containment observed

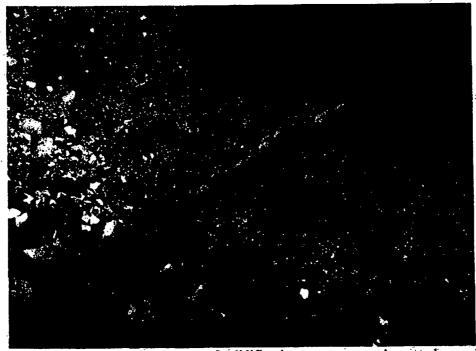


Photo #10: Discharge to area east of solidification area, no containment observed

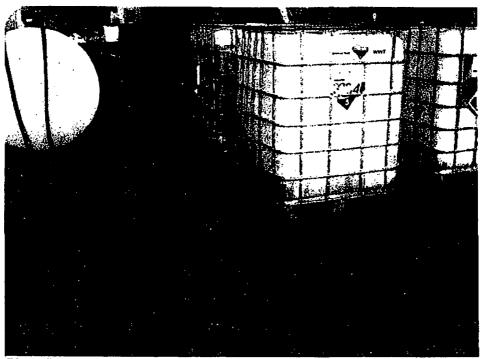


Photo #11: Area northeast of solidification area

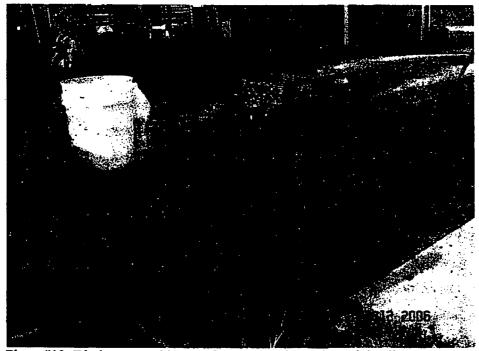


Photo #12: Discharge outside containment area in north truck loading area



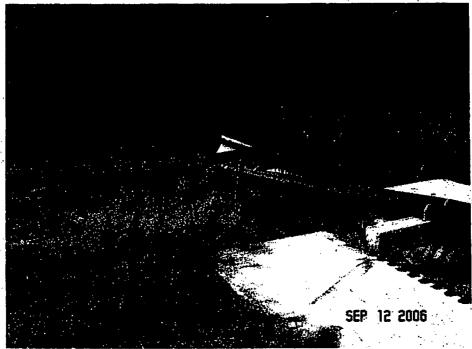


Photo #13: South stormwater pond



Photo #14: Catch basin leading to south stormwater pond



Photo #15: Leachate storage tank – leakage into secondary containment from under tank

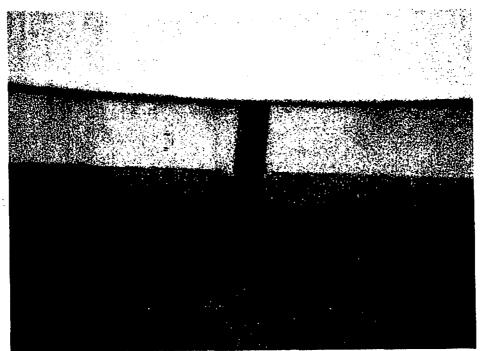


Photo #16: Leachate storage tank – leakage into secondary containment from under tank

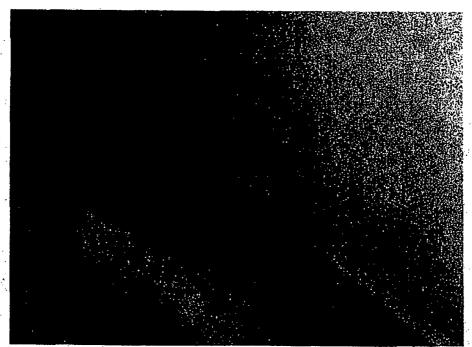


Photo #17: Leachate storage tank – leakage into secondary containment from under tank

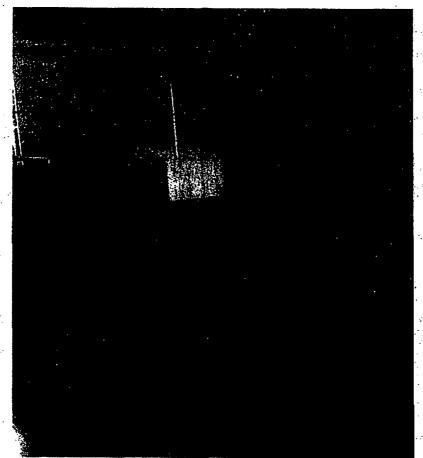


Photo #18: Leachate storage tank

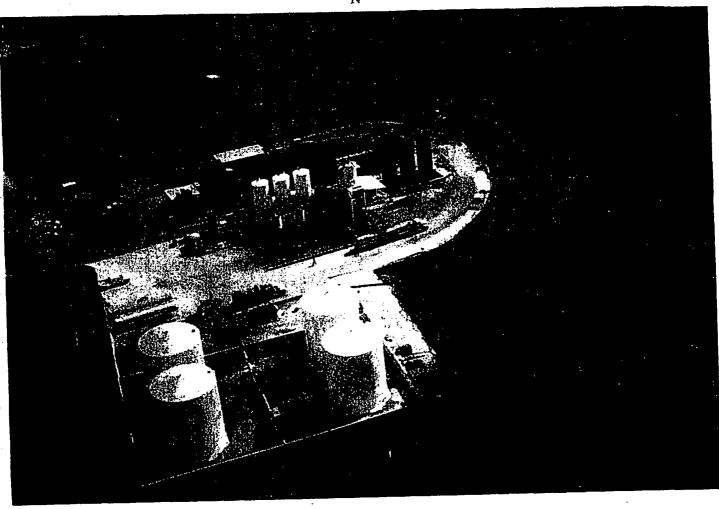


Photo #19: Sheen on stormwater pond surface (east pond)

FLORIDA DEPARTMENT OF ENVIRONMENTAL PROTECTION

WASTEWATER COMPLIANCE INSPECTION REPORT

		FA (CILITY	AND INSPEC	TIOI	NINFO	RMATION	· ·	@ =	Optional			
Name and Physical Location of Facility				WAFR ID: FLA01	WAFR ID: FLA013532			County			Entry Date/Time		
Aqua	Clean Environme	ntal Company, Inc	.		Po				9/12/06	8:20 a.m.			
3210	Whitten Road				Phone				@ Exit Date/Time				
Lake	and, FL 33811				352.793.3671				9/12/06 9;30 a.m.				
Name(s) of Field Representatives(s)				Title	Title				Phone				
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W.D.	(Dee) Miller III, I	P.E.		General Manager	General Manager				863-644-0665				
Email: aquaclean@tampabay.п.com													
	and Address of		ignated Represe	mtative T	Title Phone				@ Operator Certification #				
	(Dee) Miller III, I	P.E.		C	GENERAL MANAGER 863-644-0665								
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Name	(s) and Signature	(a) of Inspector(9 0			 	District Office/Pho	ze Numb	r	Date			
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11/06													
Janua & Angulo 12/5/06													
© Significate of Reviewer Date Yamaa Angulo SWD 813. 632.7600 EXT 404													
Fill Out This Section For All Surface Water Discharger Inspections (CEI, CSI, CBI, PAI, XSI, RI, ASI, ANI)													
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# RECONNAISSANCE INSPECTION AQUA CLEAN ENVIRONMENTAL COMPANY, INC. 3210 WHITTEN ROAD LAKELAND, FLORIDA 33811

# INTRODUCTION

On September 12, 2006, representatives of the Florida Department of Environmental Protection (FDEP) conducted a Multimedia Inspection at the above-referenced facility.

Individuals present during the inspection were as follows:

<u>NAME</u>	<u>ORGANIZATION</u>	<u>TELEPHONE</u>
Ilia Balcom Elizabeth Knauss Susan Pelz Bret Galbraith W.D. (Dee) Miller III	FDEP-Industrial Wastewater FDEP-Hazardous Waste FDEP-Solid Waste FDEP-Air Program Aqua Clean	813.632.7600, ext. 406 813.632.7600, ext. 383 813.632.7600, ext. 386 813.632.7600, ext. 129 863-644-0665

#### FIELD EVALUATION

#### 1. Permit

The facility treats petroleum contact waters and other wastes, including landfill leachate. The industrial wastewater generated at the facility is discharged to the City of Lakeland Glendale Wastewater Treatment Plant (WTP). The facility has a current wastewater discharge permit issued by the City of Lakeland that authorizes this discharge into the WTP (permit no. 1441C).

The facility currently does not have coverage under the Multi-Sector Generic Permit for Stormwater Discharge Associated with Industrial Activity (MSGP), which is administered by the NPDES Stormwater program in Tallahassee.

Rating: In compliance in relation to not needing an Industrial Wastewater permit. Observations made during the inspection were forwarded to the Department's NPDES Stormwater Program, and during the October 17, 2006 meeting, it was concluded that coverage under the MSGP is required. It was indicated during the meeting that Aqua Clean representatives would follow-up with the NPDES Stormwater Program to submit the Notice of Intent (NOI). Aqua Clean indicated to the Department on November 20, 2006 that they will submit a NOI for coverage under the MSGP within 30 days.

### 6. Facility Site Review

The following deficiencies were observed at the facility during the inspection:

- A pallet with some broken bags of sodium sulfide were observed at the southeast corner of the facility, in proximity to the stormwater pond (see photos DSC03340, DSC03342, DSC03343 and DSC03344). This was mentioned to Mr. Miller during the inspection, and the pallet of bags was removed from the area before the inspection was concluded.
- A small discharge from the solids bulking area was observed onto the concrete area between the bulking area and the stormwater catch basin (see photos DSC03346 and DSC03347). Mr. Miller indicated that a truck driver had an accident that day and that had caused the solids in the bulking area to accumulate.
- There was also standing water on the east side of the solids bulking area that appeared to be in contact with the material from the bulking area (see photos DSC03348, DSC03349 and DSC03351) This issue was also addressed by the Solid Waste program, and has been corrected according to information provided during the October 17, 2006 meeting.
- It appeared that a cleaning area had been established on one side of the tanker was pad area. Bottles and cleaning products were observed in this area. The water from this washing activity was being collected by a section of the concrete pad liner, and not directed to the wash pad drain (see photos DSC03356 and DSC03357).

Rating: Out of Compliance. All these issues are related to stormwater, which is being address under the submittal of the NOI for coverage under the MSGP.

## 8. Operation & Maintenance

The same observations made under the Facility Site review evaluation area apply to the maintenance of the facility as it relates to stormwater.

Rating: Out of Compliance. As indicated under the Facility Site Review evaluation area, all these deficiencies are related to stormwater, which is being address under the submittal of the NOI for coverage under the MSGP.

# 10. Effluent Disposal

At the time of the inspection, there were no unauthorized discharges of industrial wastewater observed at this facility.

Rating: In Compliance

# **DIGITAL PHOTOGRAPHIC LOG**

1. Facility Name: Aqua Clean Environmental Company

2. County / Facility ID#: Polk

3. Inspection Type: Reconaissance Inspection

4. Inspection Date: September 12, 2006

5. Type of Camera Used: Sony Cyber-shot 3.2 mega pixels DSC-P52 - IW digital camera Sony III

6. Digital Recording Media: Sony 16 MB Memory Stick

7. All Digital Photos Were Copied To: common drive

8. Original Copy Is Stored In/On: Alchemy

9. Were the photos altered?: NO____ YES_X__ explain yes: some photos were rotated to show correct orientation.

10. Photographer: Ilia Balcom

11. Signature of Photographer:



Photo DSC03324 8:26 a.m. - View of solids bulking area.

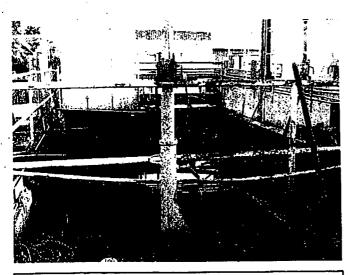


Photo DSC03327 8:27 a.m. - View of part of treatment plant.



Photo DSC03326 8:27 am- View of treatment plant area and water draining into sump.

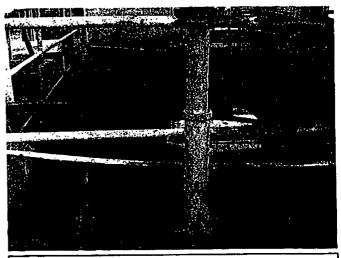


Photo DSC03328 8:28 a.m. - Closer view of part of treatment plant.

Aqua Clean Environmental Co. Page 1 of 9

**Polk County** 

RI 9/12/06



Photo DSC03329 8:33 am - view of stormwater catch basin

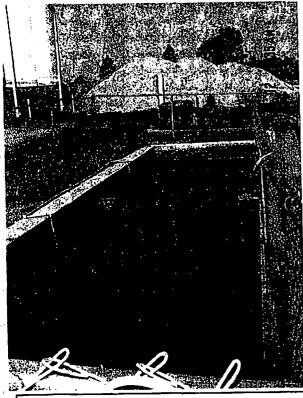


Photo DSC03331 8:35 am – another view of stormwater catch basin.

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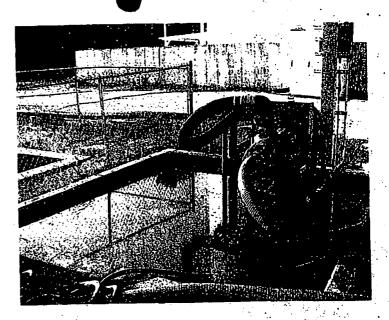


Photo DSC03330 8:33 am – view of sump pump next to the stormwater catch basin. This is used to unload materials from tankers.

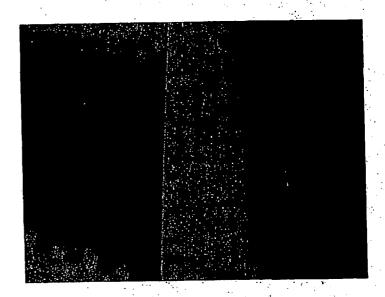


Photo DSC03332 8:35 am - view of discharge point from catch basin.



Photo DSC03333 8:35 am - view of pipe that discharges from catch basin into stormwater pond

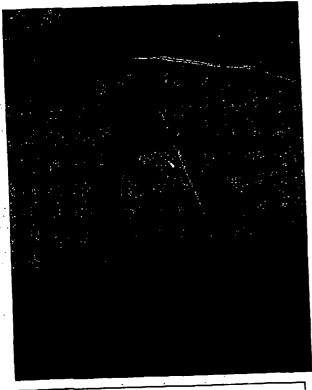


Photo DSC03334 8:35 am – another view of pipe that discharges from catch basin into stormwater pond

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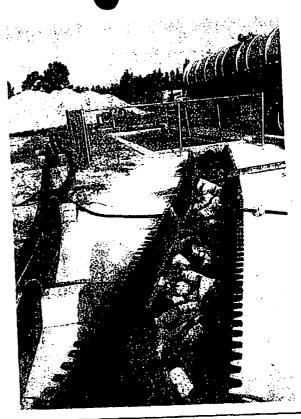


Photo DSC03335 8:36 am – another view of pipe that discharges from catch basin into stormwater pond

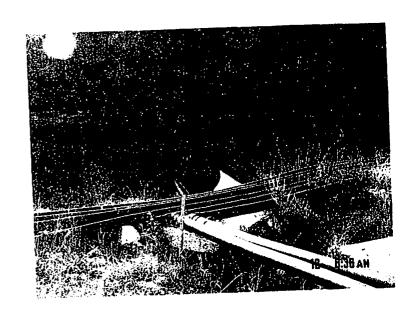


Photo DSC03336 8:36 am - view of the end of discharge pipe from catch basin and stormwater pond.



Photo DSC03337 8:37 am – view of stormwater pond with discharge pipe from catch basin.

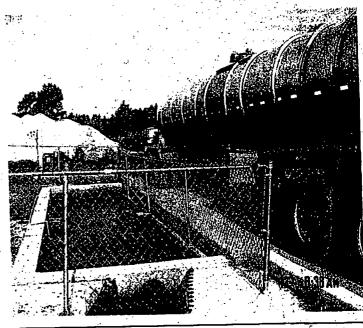


Photo DSC03338 8:38 am - view of tanker next to catch basin

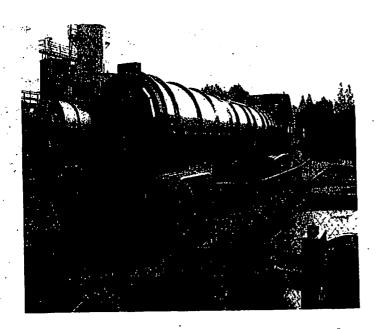


Photo DSC03339 8:41 am - view of tanker next to catch basin

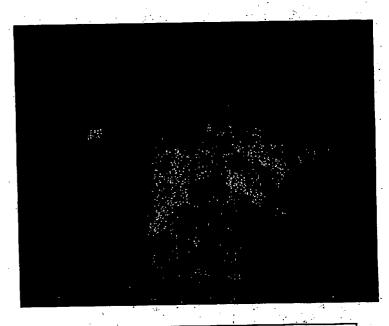


Photo DSC03340 8:42 am - view of broken bags of sodium sulfide next to the stormwater pond

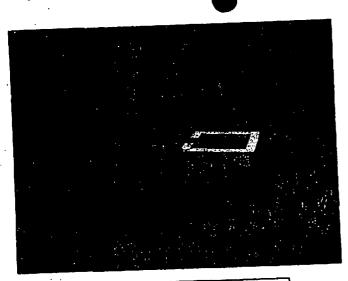


Photo DSC03341 8:42 am - view of discharge structure from stormwater pond.

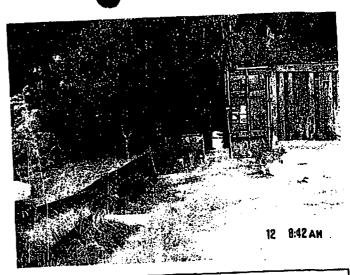


Photo DSC03342 8:42 am – view of bags of sodium sulfide located to the right of the stormwater pond discharge structure



12 8:43 AM



Photo DSC03344 8:44 am - closer view of broken bags and also dirty buckets.

Photo DSC03343 8:43 am — view of bags of sodium sulfide located to the right of the stormwater pond discharge structure

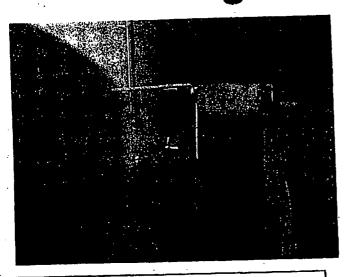


Photo DSC03345 8:55 am -- view containment area for tanks with leachate.

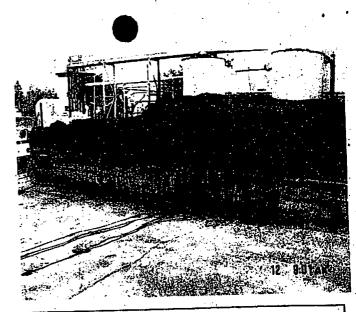


Photo DSC03346 9:01 am — view solids bulking area, notice discharge from this area into concrete pad.

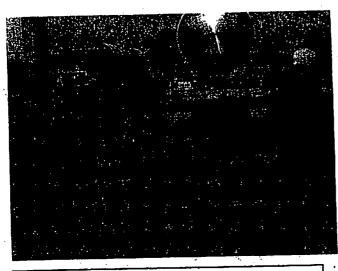


Photo DSC03347 9:01 am -- view of area between solids bulking area and catch basin.

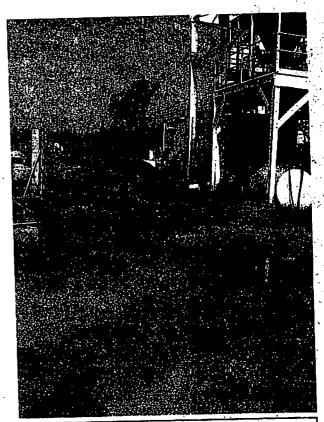


Photo DSC03348 9:03 am - View of area behind the solids bulking area.

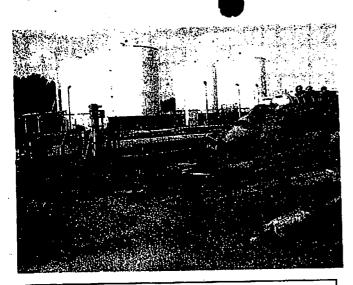


Photo DSC03349 9:04 am - View of back area of the solids bulking area and the tank farm for the leachate.

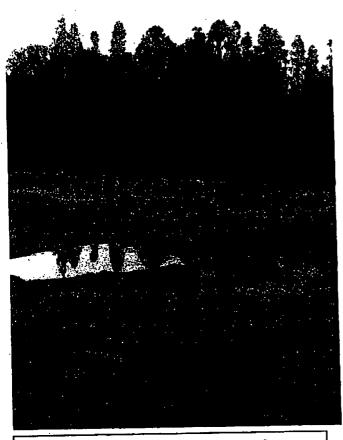


Photo DSC03351 9:05 am —— another view of area behind the solids bulking area, with the stormwater pond in the background.

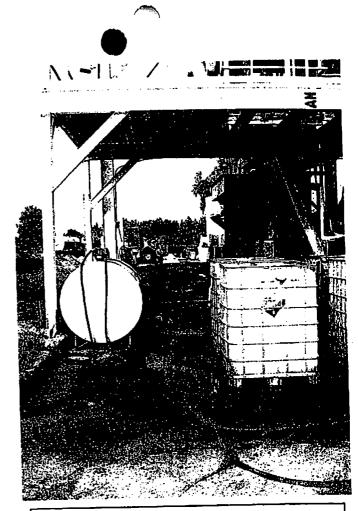


Photo DSC03350 9:04 am -- view of area next to the solids bulking area.



Photo DSC03352 9:07 am - tanker wash area



Photo DSC03354 9:08 am - closer view of drain from the tanker wash pad.

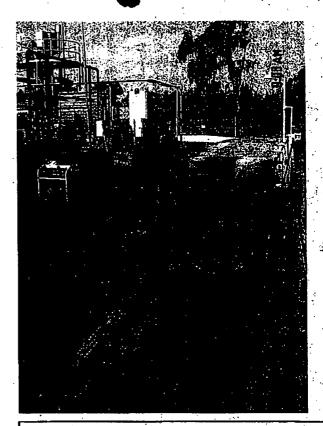


Photo DSC03353 9:08 am - tanker wash area showing drain.

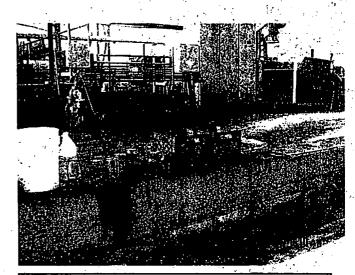


Photo DSC03357 9:10am - Cleaning area by the tanker wash pad area.

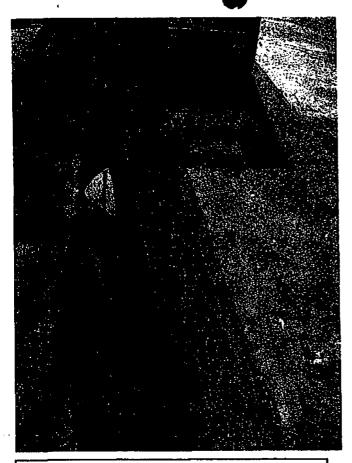


Photo DSC03356 9:10 am - closer view of water being collected outside the tanker wash area.

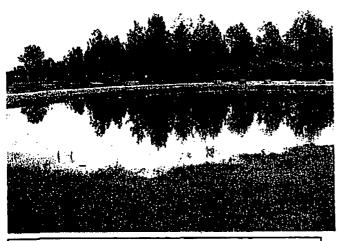


Photo DSC03358 9:11 am - view of the other stormwater pond located behind the office building.