UNIVERSAL ENVIRONMENTAL SOLUTIONS

Letter of Transmittal

Date: February 4, 2015

Mr. Sean McGinnis, P.E. III
F.D.E.P. Southwest District (Permitting)

File: UES Process Permit
Re: UES Used Oil Processing Facility Permit Application – Revision 1

Enclosed please find:
_X_herewith ___under separate cover: ___drawings ___descriptive literature ___letters

If all information listed is not received, please contact us immediately.

Quantity	T	Comments
1 Hard Copy / 1 PDF (Electronic Disk)	UES Used Oil Processing Facility Permit Application –FLR000199802 Revision 1, February 2015	Y

*Comment letter code:
R-Reviewed **N**-Reviewed and Noted **I**-For your Information **Y**-For your approval

The attached revised UES Used Oil Processing Facility Permit Application – Revision 1 is being submitted in response to the submission of the permit application submitted on October 16, 2014. The submission was submitted to address a site audit at the UES facility located at 1650 Hemlock St Tampa Fl. and subsequent deficiency letter dated September 22, 2014.
A response letter was prepared and submitted detailing our intent to apply and submit an Oil Processing Facility permit request. UES has addressed the following noted deficiencies in this permit re-submission:

- Alternate Equipment Approval (62-762.851 FAC) request for use of a 10K Poly Used Oil storage tank at the facility. UES has submitted a request to allow the use of polyethylene tank to store used oil. The process utilized to recycle the used oils will result in a reaction / degradation to metal or steel tanks over an extended period of time. An Alternative Equipment request has been prepared and is attached under Attachment 9 Unit Management Plan but has not been approved by the DEP at the time of this permit submission. The variance waiver request was submitted via email to Mr John P. Svec P.E. on December 23, 2014.
- No Exposure Certification Form NPDES Stormwater Permitting (form has been prepared and is attached under Attachment 7 - SWPP Plan. The exemption request was transmitted to the DEP Tallahassee (02/02/2015).

The following items are attached to this transmittal letter for your reference.

- Draft UES Used Oil Processing Facility Permit Application Deficiency letter dated December 05, 2014 with responses in red text detailing the revisions, modifications and comments contained in this Revision 1 submittal transmittal. (8 Pages)
- A copy of the September 22, 2014 Facility Inspection Deficiency letter. (5 Pages).
- UES Response letter dated September 29, 2014 detailing the corrective actions including the request to submit this permit request. (1 Page).
- DEP Form 62-710.910(6) UES Used Oil Processing Facility Permit Application (8 Pages).
- DEP Form 8700-12FL Application Florida Notification of Waste Activity (5 Pages).
- A Table of Contents detailing the page assignments of the Attachments (1 Page).

If you have any questions, comments or concerns please contact me at your earliest convenience.

Regards,

Ed Kinley,
President

DISTRIBUTION:
Bheem Kothur, P.E. (FDEP)
Elizabeth Knauss (FDEP)
Anthony Tripp (FDEP)
Bryan Baker (FDEP)
Keith Coats (P.E.)
Jim Seavy (Consultant)

P.O. Box 76105, Tampa, FL 33675 ~ Phone (813) 241-9206 ~ Fax (813) 241-9215

FLORIDA DEPARTMENT OF ENVIRONMENTAL PROTECTION
13051 North Telecom Parkway
Temple Terrace, Florida 33637-0926

September 22, 2014

Mr. Ed Kinley, President
Universal Environmental Solutions, LLC
P.O. Box 76105
Tampa, FL 33675
ekinley@uestampa.com

Re: Compliance Assistance Offer
Universal Environmental Solutions, LLC
Facility ID No. FLR000199802
Hillsborough County

Dear Mr. Kinley,

A hazardous waste and used oil program inspection was conducted at your facility on August 12, 2014, under the authority of Section 403.061, Florida Statutes (F.S.). During this inspection, possible violations of Chapter 403, F.S., Chapter 62-621, Florida Administrative Code (F.A.C.), and Chapter 62-710, F.A.C. were observed. The purpose of this letter is to offer you compliance assistance as a means of resolving these matters.

Please see the attached inspection report for a full account of Department observations and be advised this Compliance Assistance Offer is part of an agency investigation preliminary to agency action in accordance with Section 120.57(5), F.S. We request you review the items of concern noted in the attached inspection report and respond in writing within **15 days** of receipt of this Compliance Assistance Offer. Your written response should either:

1. Describe what you have done to resolve the issue (see "Recommendations for Corrective Action" section of the report),
2. Provide information that either mitigates the concerns or demonstrates them to be invalid, or
3. Arrange for one of our inspectors to visit your facility to offer suggested actions to return to compliance without enforcement.

It is the Department's desire that you are able to document compliance or corrective actions concerning the possible violations identified in the attached inspection report so that this matter can be closed without enforcement. Your failure to respond promptly in writing (or by e-mail) may result in the initiation of formal enforcement proceedings.

Florida Department of

Environmental Protection

Hazardous Waste Inspection Report

FACILITY INFORMATION:

Facility Name: Universal Environmental Solutions LLC

On-Site Inspection Start Date: 08/12/2014 **On-Site Inspection End Date:** 08/12/2014

ME ID#: 108745 **EPA ID#:** FLR000199802

Facility Street Address: 1650 Hemlock St, Tampa, Florida 33605-6602

Contact Mailing Address: 1650 Hemlock St, Tampa, Florida 33605

County Name: Hillsborough **Contact Phone:** (813) 241-9206

NOTIFIED AS:

Non-Handler

Transporter

INSPECTION TYPE:

Routine Inspection for Transporter facility

Routine Inspection for Used Oil Transfer Facility

INSPECTION PARTICIPANTS:

Principal Inspector: Elizabeth Knauss, Environmental Consultant

Other Participants: Ed Kinley, President; Brad Salzgerber, Plant Operator

LATITUDE / LONGITUDE: Lat 27° 56' 17.0326" / Long 82° 26' 28.1097"

SIC CODE: 4212 - Trans. & utilities - local trucking, without storage

TYPE OF OWNERSHIP: Private

Introduction:

Universal Environmental Solutions has notified as a registered hazardous waste and used oil transporter and used oil transfer facility. To date, the company has not transported any hazardous waste. The original notification did not include petroleum contact water management activities, although the facility's main business is pre-treating bilge water, oily waste water and fuel contaminated water from shipyard and port terminal facilities. The facility also accepts landfill leachate, fertilizer contaminated waste water and other non-hazardous industrial waste waters for pretreatment prior to discharge to the City of Tampa's Howard F. Curren domestic waste water treatment facility. The plant is located on property leased from Hendry Corporation's shipyard. This was the Department's first inspection of the facility. Ed Kinley, the company president and Brad Salzgerber, the plant operator explained operations during the inspection.

Process Description:

Universal's Subcategory D centralized waste treatment ("CWT") permit from the City of Tampa, issued March 4, 2014, allows the company to accept metal bearing, oily and organic category waste waters for treatment. The company has a waste profile process, but individual profiles are not required for all waste streams. At this time, Universal is accepting waste from one other transporter. Otherwise, trucked waste is transported by Universal vehicles. These wastes are usually generated by Universal's tank and barge cleaning activities, and can be categorized by product and process knowledge. The facility also had a number of Chlor-d-Tect kits on site for screening incoming oil. Test results are noted on the shipping papers. However, the kits had recently passed their expiration date. Mr. Kinley stated that new kits would be purchased.

Universal also receives waste through a six inch underground pipeline from the Hendry docks. The underground portion of the pipeline is provided with secondary containment, and a flange connects to two, three inch lines leading to the treatment plant. The three inch above ground lines are not

provided with secondary containment for about five feet between the pipeline and the concrete containment structure around the treatment system. The pumps associated with loading area are provided with containment.

The treatment plant includes an outdoor concrete secondary containment structure surrounding treatment and storage tanks where settling and oil/water separation takes place. Waste water from the outdoor treatment tanks is pumped for further treatment into additional tanks located within an adjacent metal building. Waste water inside the building is treated by gravimetric separation, pH adjustment, flocculation and dissolved air flotation. Recovered organics are managed as used oil. Waste water is discharged through pipes to the sanitary sewer. It should be noted that the plant's schematic flow diagram indicates that the existing eight inch sewer line receiving the waste water is a terra cotta pipe. Additional details on the treatment process may be found in the facility's submittals to the City of Tampa's pretreatment program and on the company's web site.

Sediments from the treatment process are being accumulated in a roll off container located on the west side of the building, and will be tested for the toxicity characteristic prior to disposal. To date, Universal has only disposed of Number 6 oil bottoms from a ship cleaning operation as waste. This material had not been processed through the treatment plant, but was accumulated separately. It was shipped to an off site facility for solidification and disposal to a landfill. The company believes that solids will need to be removed from the outside treatment tanks on an annual basis.

The treatment building is also used for container storage. At the time of this inspection, a number of IBC containers and drums of material were being stored, and none were labeled as "used oil." Mr. Kinley explained that the company also stores oil such as hydraulic oil while ships are being repaired. These oils are returned to the ship when repairs are complete. While being stored, each container is labeled with the type of fluid and the ship or customer name. A number of labels also had the words "Non Regulated Waste." This labeling should not be used for materials that are not wastes.

The outdoor tanks include three, 69,300 gallon capacity compartmented tanks used for settling solids and for oil/water separation. The three tanks are operated in parallel, and all connect to a fourth tank located perpendicular that provides for additional settling before water is pumped into the building for additional treatment. The outdoor containment area also includes three blue 5,000 gallon steel tanks, one labeled for gasoline storage and two labeled for diesel. The gasoline and diesel tanks are dedicated to holding fuel removed from ships and port terminal facilities. This off specification fuel is not returned to the ship or terminal. Instead it is marketed as fuel for further processing. The shipping papers for the material indicate it is shipped as either gasoline, diesel or "transmix" to a processor that will market the fuel. A 10,000 gallon tank for storing recovered oil is also located within the outdoor containment. This tank was labeled "waste oil" rather than as "used oil," and this has been corrected. At the time of the inspection, registration forms had been submitted for the 5,000 gallon tanks, but not the 10,000 gallon tank. Final inspections had not been completed, and the facility had not yet been issued a Tanks Program facility identification number. In addition, Universal had not registered with USDOT to offer hazardous materials for transport. This was corrected after the inspection.

At the time of this inspection, the facility was holding partially treated oil in several frac tanks located outside the containment structure. Mr. Kinley said that the material was emulsified shale oil that the facility was processing to try to separate additional water. The frac tanks were not labeled with the words "used oil" and had been stored on site for more than 35 days. In addition, the tanks were not provided with secondary containment. Universal intended to ship the oil to Raider Environmental Services for additional processing as off specification oil. Universal does not market used oil fuel. Universal was in compliance with acceptance and delivery record keeping requirements. The facility had submitted its annual report on time, and maintained the required certificate of insurance.

The Hendry Corporation NPDES Multi Sector Generic Storm Water permit as a shipyard does not cover Universal's activities as a waste recycling and treatment facility. If Hendry is not willing to amend its coverage, Universal must seek separate coverage under a separate permit.

New Potential Violations and Areas of Concern:

Violations

Type:	Violation
Rule:	62-710.401(6)
Explanation:	Used oil was being stored in frac tanks that were not labeled or provided with secondary containment. Used oil was also being stored in a 10,000 gallon tank that was labeled "waste oil" instead of "used oil." The label on this tank was corrected after the inspection.
Corrective Action:	Used oil tanks and containers must be labeled "used oil" and must be provided with secondary containment when stored for more than 24 hours at a transfer facility.

Type:	Violation
Rule:	62-710.800
Explanation:	Universal Environmental Solutions is engaged in used oil processing and petroleum contact water management and does not have a permit from the Department for these activities. Universal has also stored used oil more than 35 days without complying with processor standards under 40 CFR 279 Subpart F standards.
Corrective Action:	Universal must submit an application for a used oil processing permit to the Department.

Type:	Violation
Rule:	62-621.100
Explanation:	Universal had not applied for coverage under a NPDES Multi-Sector Generic Storm Water permit ("MSGP") for its industrial activities.
Corrective Action:	Universal must submit its notice or intent to use the MSGP and develop a Storm Water Pollution Prevention Plan appropriate to the facility's used oil and waste water pretreatment activities.

Conclusion:

Based on the nature of the activities conducted by Universal Environmental Solutions, the company is operating as a used oil processor and petroleum contact water recovery facility. The facility must apply for appropriate permits from the Department for its activities.

Please address your response and any questions to Sean McGinnis of the Southwest District Office at (813) 470-5866, or via e-mail at sean.mcginnis@dep.state.fl.us. We look forward to your cooperation with this matter.

Sincerely,

Kelly Bishop

Kelly L. Bishop, PG
Assistant Director
Southwest District
Florida Department of Environmental Protection

KLB/sm/ek

Enclosures: Inspection Report

ec: Gerry Javier, HEPC (javier@epchc.org)

Signed:

A hazardous waste compliance inspection was conducted on this date, to determine your facility's compliance with applicable portions of Chapters 403 & 376, F.S., and Chapters 62-710, 62-730, 62-737, & 62 -740 Florida Administrative Code (F.A.C.). Portions of the United States Environmental Protection Agency's Title 40 Code of Federal Regulations (C.F.R.) 260 - 279 have been adopted by reference in the state rules under Chapters 62-730 and 62-710, F.A.C. The above noted potential items of non-compliance were identified by the inspector(s).

This is not a formal enforcement action and may not be a complete listing of all items of non-compliance discovered during the inspection.

Elizabeth Knauss	Environmental Consultant	
PRINCIPAL INSPECTOR NAME	**PRINCIPAL INSPECTOR TITLE**	
E Knauss		
PRINCIPAL INSPECTOR SIGNATURE	FDEP - SWD **ORGANIZATION**	8/13/2014 **DATE**

Supervisor: **Sean McGinnis**

NOTE: By signing this document, the Site Representative only acknowledges receipt of this Inspection Report and is not admitting to the accuracy of any of the items identified by the Department as "Potential Violations" or areas of concern.

UNIVERSAL ENVIRONMENTAL SOLUTIONS

September 29, 2014

Mr. Sean McGinnis

FDEP Southwest District Office
13051 North Telecom Parkway
Temple Terrace, FL. 33637

Re: Compliance Assistance Offer Letter (09/22/2014)

Dear Mr. McGinnis,

Please consider this correspondence as our initial reply to your letter dated (09/22/2014). We offer the following:

- Item #1 (Violation of Rule #67-710.800): The 10,000 Gallon tank has a corrected label that now clearly reads, on two sides, "USED OIL". Please note that this tank was omitted from our recent tank registration with the EPC. An application is being prepared to have it formally registered. Our target date for submission is 10/10/2014.

- Item #2 (Violation of Rule #62-710.800): We are preparing our application for our operation as a "Used Oil Processing Facility". There is quite a bit of detail involved to this application including drawings, photographs, and descriptions. We are working with our Professional Engineer and General Contractor to finalize this submittal. Our target date for submission is 10/10/2014.

- Item #3 (Violation of Rule #62-621.100): We intend to apply for a "No Exposure Certification for Exclusion from NPDES Stormwater Permitting". During the inspection, the FDEP Representative correctly identified that the facility had (4) temporary Frac tanks storing an Oil and Water mix outside of the permanent containment of the tank farm. We have emptied three of the four tanks. The fourth tank will be emptied before 10/10/2014. We intend to construct additional containment to hold future temporary frac tanks. This containment will satisfactorily meet the 110% storage criteria. A drawing highlighting this additional containment will be submitted with our NPDES Stormwater Exclusion application. We expect to submit our application before the end of October.

We appreciate your willingness to assist our operation in its effort to be in compliance. We are only interested in operating within the Department's rules and expectations.

Kindest Regards,

Ed Kinley

President

P.O. Box 76105. Tampa. FL 33675 ~ Phone (813) 241-9206 ~ Fax (813) 241-9215

Notice of Deficiency
December 05, 2014
Universal Environmental Solutions, LLC
Tampa Facility, Florida
EPA I.D. No. FLR 000 199 802
Permit No. 330300-HO-001

General Comments:

1. Permit Renewal Application Cover Letter dated October 16, 2014: The subject facility I.D. should be "FLR 000 199 802" instead of "FLR 000 199 80". Please review and correct the subject cover letter as appropriate in future correspondence.

Response 1 - Noted and revised in Revision 1 submission.

2. Used Oil Processing Facility Permit Application, Part I, Item 3, Marketers, Page 1 of 8: It appears that the facility marked as "Marketer". However, in the DEP inspection report dated August 12, 2014 it is noted that "Universal does not market used oil". Please review and revise as appropriate and also revise and re-submit the 8700-12FL Form (accessible at http://www.dep.state.fl.us/waste/quick_topics/forms/documents/62-730/730_1b.pdf), accordingly.

Response 2– Form 8700-12FL has been included in the Revision 1 submission. It was inserted after form 62-710.901(6) Used Oil Processing Facility Permit Application page 8 of 8.

3. Used Oil Processing Facility Permit Application, Part I, Item 9, Page 1 of 8: Please verify the contact person telephone number and revise as appropriate.

Response 3– Contact, Operator and Facility Owners name, number address are correct and have been verified.

4. Used Oil Processing Facility Permit Application, Part I, Item 13, Site Ownership Status, Page 2 of 8: Please review the lease expiration date and update as appropriate.

Response 4 – Lease does not have condition of expiration presently. Lease agreement allows operation in Perpetuity as stated.

5. Tab 1, Attachment 1, Sub-Section 1.1, Detailed Facility Processes Figures, Third Line: Please identify the appropriate Tab and Attachment for Sub-Section 1.7 and Sub- Section 1.8, etc. through the permit application.

Response 5 – To address this comment as well as others listed below, a permit reference site plan and process flow map has been included as Attachment 1.3.1 and 1.3.2. The plan and map has been modified to include all of the information requested in comments regarding tank identification, engineering calculations, equipment and building identification and emergency evacuation and meeting locations. Attachments maps, figures and plans have been updated have been updated to reflect these additions. The following site plan and process flow map have been added:

Figure 1.3.1 Permit Submission Reference Figure 1.3.1 – Unit Designators. This Figure details the Waste Management Unit Designators.

Figure 1.3.2 Permit Submission Reference Figure 1.3.1 – Emergency Evacuation Routes and Spill/Emergency Kit Locations.

Figure 1.3.3 Permit Submission Reference Figure 1.3.3 – Onsite Traffic Vehicle Patterns & Containment Pad Capacity Calculations. This figure details the summary of the capacity calculations detailed in Figure 1.3.4 and 1.3.5.

Figure 1.3.4 Permit Submission Reference Figure 1.3.4 – Tank Containment Pad Capacity Calculations – Detailed Tank Containment Pad Calculations.

Figure 1.3.5 Permit Submission Reference Figure 1.3.4 – Frac Tank Containment Pad Capacity Calculations – Detailed Tank Containment Pad Calculations.

6. Tab 1, Attachment 1, Facility Detailed Processes Description, Sheet 3 of 3, Processes Flow Map, Page 5: Please provide the detailed calculations for secondary containment for the Frac Tank Storage Area and Main Tank Storage Area. Also, identify the Roll-Off Area on this map. Processes Flow Map should also identify Evacuation Routes and gathering places during an emergency situation.

Response 6 – See Response 5. A Permit Submission Reference Figure 1.3.3 summarizing the Frac Tank and Tank Pad capacity calculations. Figure 1.3.4 and 1.3.5 that shows the detailed calculations has been added as Attachment 1.3.3.2. Information requested is shown on these maps.

7. Tab 2, Attachment 2, Facility Description, Sub-Section 2.2- Waste Management Unit Designations, Third Line, Page 9: Please Identify Section B.3-Figure 3?

Response 7 - See Response 5. Reference has been changed to 1.3.1detailing the Unit Designators. Unit Designators are in included in Map Legend and are bolded and shown in Green.

8.Tab 3, Attachment 3, Detailed Process Flow Description, Page 11: The facility should include details of petroleum contact water (PCW) management practices, including descriptions of product receipt, water separation and shipment of reclaimed product to the ultimate user or to another recycler. DOT compliance is a concern regarding identification of gasoline/diesel mixtures. Please see Comment 29 in this document regarding information for compliance and training per USDOT.

Response 8 – PCW acceptance process has been added as Attachment 3 Section 3.4. All figures and tables have been update to identify the PCW tanks as Tank 6, Tank 7 and Tank 8. UES provides 40 HAzWOper for all of its employees. Attachment 11 has been updated to reflect this training. HazWOper training. The training has been customized to cover all HAzWoper training requirements and client specific DOT training regarding used oil transportation. Attachment 11 has been update to reflect this information.

9. Tab 4, Attachment 4, Waste Analysis plan, and Sampling Plan, On-Specification Claim, 40 CFR 279.11, on-Specification Criteria, Analytical Testing, Page 22: Please add Sulfur, and Total Halides parameters to the list. Please explain and or provide Rebuttable Presumption Analysis Flow Chart to the Application.

Response 9 – Sulfur and total halides have been added to table 4.3.1 and rebuttable analysis flow chart has been added to Attachment 4 as 4.4.2.

10. Tab 4, Attachment 4, Waste Analysis Plan, Industrial Wastewater: Information on the facility's centralized wastewater treatment permit under the Clean Water Act should be referenced in this section, if non-hazardous industrial wastewater is accepted for treatment. What categories of wastewaters are accepted? Is the facility's permit under Subcategory A (metals), B (oils), C (organics), or D (multiple waste streams subcategory)? Also, information regarding industrial wastewater in this application, it must be made clear that the permit being issued is for disposal of industrial wastewater.

Response 10 – A copy of the approved wastewater permit has been added to this section as 4.5.1. The requested information is included categories of wastewater (D) and specific details about permitted wastewater disposal.

11. Tab 5, Attachment 5, Sludge, Residue, And Byproduct Management Plan, Page 30: It appears that the sampling was conducted on September 8, 2014 to determine the waste stream to be non-hazardous. It is not clear that this sampling will be done annually, semi-annually, or quarterly. If it is proposed for

annually, then this is not acceptable. However, the hazardous waste determination should be made semi-annually at minimum to verify any changes in the documented TCLP parameters.

Response 11 – Attachment 5 text has been modified to include a minimum of semi-annual sampling will be conducted to assure non-hazardous status of the sludge. (Page

12. Tab 5, Attachment 5, Sludge, Residue, And Byproduct Management Plan Page 30: Please show on a map where the waste sludge is transferred to an on-site roll-off for sampling and disposal. Please ensure that the sludges are also tested semi-annually.

Response 12 –Permit Reference Figures 1.3. and 1.3.2 detail the location of the sludge roll-off box. The transfer piping is called out and the location has been bolded to identify its location.

13. Tab 6, Attachment 6, Tracking Plan, 6.1.1-What are halogens?, the Second Sentence, Page 31: The second sentence should be re-worded to read that "the following wastes are often mixed with used oil and may be contaminated with halogenated organic compounds".

Response 13 – Noted and changed in revision 1.

14. Tab 6, Attachment 6, Tracking Plan, 6.1.4.2-Testing, Page 33: It appears that during the inspection, the facility indicated that they did not use TIF sniffers, and only used Dexil Kits. However, 6.1.4.2 refers to sniffers. Please review and revise as appreciate.

Response 14 – TIF XP-1A sniffers are provided and in use as detailed Attachment 6. New Chlor-D-Tect kits have been purchased and are available.

15. Tab 6, Attachment 6, 6.2-Waste Tracking Documents, 31: Facility must provide a sample field documentation form that you will use for sampling and recordkeeping. Also, the facility must maintain a sample log noting the date and time of sampling, the name of the sampler, the container or tank samples, analytes, the lab analysis number for cross reference, etc. This is so that every sample can be tracked to its analysis, and every analysis can be tracked to a specific sample. Please see the FDEP 62-160, F.A.C., QA/QC Rule and SOP's.

Response 15 - The data package included in Attachment 6 Section 6.3 includes a copy of the Chain of Custody (COC) referenced in comment 15. Attachment 6 Section 6.1.6 has been expanded to include discussion the use of the laboratory COC's, waste profile form and sampling log book to address this comment.

16. Tab 8, Attachment 8, Contingency Plan and SPCC Plan, Page 55: Please show the location of all emergency equipment on a map.

Response 16– The SPCC Plan has been reformatted and updated to reflect changes requested in Comments 16, 17, 18, 19, 20, 21, 22 and 23. Figures have been updated to show locations of emergency equipment and evacuation and meeting locations.

17. Tab 8, Attachment 8, Contingency Plan, SPCC Plan, Record Keeping And Reporting, State & Local Agencies, Page 75: Please update the FDEP Tallahassee (normal business hours) phone number to read (850) 245-8707, the State Warning Point (24 hour-spill contact) phone number to read (800) 320-0519 and EPA Emergency Response (Atlanta) phone number to read (404) 562-8700.

Response 17 – Noted and modified as requested in Revision 1.

18. Tab 8, Attachment 8, Contingency Plan, SPCC Plan, and Page 75: Please provide all agencies physical mailing addresses.

Response 18 – Noted and modified as requested in Revision 1.

19. Tab 8, Attachment 8, Contingency Plan, SPCC Plan, Emergency Contacts, Page 75: Please add the Oil Spill Contractor name and their emergency contact phone number. Also, add local addresses for all Emergency Contacts to the list.

Response 19 – Noted and modified as requested in Revision 1.

20. Tab 8, Attachment 8, Spill Prevention, Control, And Countermeasure Plan, Fire Protection And Emergency Action Plan, Statement Of Policy, Page 86: The policy statement must be signed by appropriate facility manager.

Response 20 – Noted and signed as requested in Revision 1.

21. Tab 8, Attachment 8, Contingency Plan SPCC Plan, 75: Please add Hazardous Materials Clean-up Contractor and Alternate Emergency Coordinator Cell phone numbers, respectively.

Response 21 – Noted and added as requested in Revision 1.

22. Tab, 8, Attachment 8, Contingency Plan, SPCC Plan Page 80: Facility has listed contact numbers for the police and EMTs. In addition to this, please provide numbers of the closest fire and police station, as well as, the nearest hospital. Facility may list both and instruct their people to call but both numbers need to be there. Also need to include your outside cleanup contractor

information here. Facility's primary and secondary emergency coordinators phone numbers and home mailing address must be included. Please review and revise as appropriate.

Response 22 – Noted and modified as requested in Revision 1.

23. Tab 8, Attachment 8, Contingency Plan/SPCC Plan, Page 62: Please review the P.E., Certification page. This page needs to be signed.

Response 23 – Noted and signed as requested in Revision 1.

24. Tab 9, Attachment 9, Unit Management Plan, Sub-Section 9.3-Tank Certification, Page 106: Please obtain the Variance letter from the Department and attach the same.

Response 24 – The exemption request letter was resent to Mr John Svec P.E. on December 22, 2014 via email and is under review for exemption. UES is unsure if approval will be granted. If granted the response will be submitted as an addendum to the permit submission. If denied UES will have to modify the permit submission documents to include modifications or replacement of the tank.

25. Tab 10, Attachment 10, Closure Plan, Sub-Section 10.9- Closure Cost Estimates, Page 131: The Certification By Engineer and Owner/Operator is incomplete. Please review this page. This page needs to be signed.

Response 25 – Noted and signed as requested in Revision 1.

26. Tab 10, Attachment 10, Table 10.2-1, Waste Management Unit Information, Page 121: Please identify the PCW tank to the tank table.

Response 26 – Tanks shown as Tank 6, Tank 7 and Tank 8 are re-identified as PCW tanks and have been update in each of the maps, plans and figures attached in the permit and SPCC Plan.

27. Tab 10, Attachment 10, Closure Plan, Closure of Tank Storage: All wastes need to be tested for hazardous waste characteristics. Please revise as appropriate.

Response 27 – Sections 10.4.1.B.4, 10.4.2.B.4 are revised to include hazardous waste characterization sampling as well as VOC and SVOC sampling and analyses. Costs associated with sampling for characterization were included in the quote from the subcontractor but not referenced in the plan. Costs do not change.

28. Tab 10, Attachment 10, Closure Plan, Closure Cost Estimate, Page 130: The facility shall propose vertical and horizontal soil sampling (including parameters) around all waste handling areas to determine if any contamination exists. Also propose groundwater sampling which may be contingent upon results of soil sampling. The closure cost estimate should address these items.

Response 28 – Section 10.4.1.B.4 and Section 10.4.2.B.4 describe soil boring procedures for characterization of waste handling areas including collection of concrete cores, wipes and sampling analyses. Cost closure includes costs for these activities. Costs are based on square footage of areas estimates provided in the sections listed above .

29. Tab 11, Attachment 11, Employee Training, and Page 136: The employee training program does not include USDOT hazardous materials training. Used Oil is commonly contaminated with gasoline, and the mixture may be flammable. Universal Environmental Solutions, LLC used oil screening procedure from the waste analysis plan only includes halogen screening. Chlor-D-tect kits will not assess the flammability of the materials Universal Environmental Solutions, LLC may be called upon to transport. Please modify the employee training program to include USDOT hazardous materials training.

Response 29 – All UES employees that are working at the pretreatment facility or involved with transport are OSHA 40 Hr HazWOper trained, the training includes required USDOT required training modules. Documentation of initial and annual OSHA 40 Hr HazWOper employee training is available on file at the facility. This Section has been revised to include Section 11.2 regarding information pertaining to DOT and OSHA training provided to employees.

30. Tab 11, Attachment 11, Employee Training, Page 136: This Section needs to be expanded. Also state that writer training records including name of the employee, date and type of training will be kept at the site.

Response 30 – Section 11.3 Training Record Keeping has been added to include employee information date and retainage of training records onsite. Records are available upon request and are kept in the UES offices located onsite.

31. Tank Inspection: The facility must provide documentation of each Tank's last detailed inspection, installation and certification to the Department.

Response 31 - Section 9.5 page 110 includes information requested (certification) for the 3 Used and Virgin Fuels and PCW, page 110-120 includes the exemption for the 10,000 gallon used oil tank. Facility operator tank inspection records areb being started following approval of this permit. Previous recors were logged in the onsite logbook. Copies of the tank inspections forms are included in Attachment 9.

32. Facility needs to submit a site map in an electronic format (pdf preferred) so that this map can be added to the permit.

Response 32 – A CD is included of all PDF and Source files including Maps, Figures and text. A CD is included in the inside cover of the Revision 1 cover that contains all electronic files contained within the submission both PDF and Source format.

33. Facility needs to submit a used oil tank table in an electronic format (pdf preferred) so that this table can be added to the permit.

Response 33 – A CD is included of all PDF and Source files including Maps, Tables, Figures and text. A CD is included in the inside cover of the Revision 1 cover that contains all electronic files contained within the submission both PDF and Source format. A Used Oil Tank table is included electronically on the CD.

34. Solid Waste Permit Application: The facility expressed their interest through a conference call on December 4, 2014 to obtain a combined permit including Solid Waste Permit to operate solid waste operations as bulking and solidification of oily waste and petroleum impacted soil and groundwater, with reference to the used oil application for further details. However, the details provided in the used oil application with respect to the bulking, solidification, and management of non-hazardous oily wastes were not adequate to address the items in this permit application. Therefore, DEP explained about the Solid Waste Permit Application, Short Version, 62-710.900(4), F.A.C., and the permit fee of $2,000.00 required to process. Please review and let me know your thoughts and decisions.

Response 34 – The facility is anticipating expanding operations to include solid waste processing. We would like to submit and approve of the permit presently under submission and submit the Solid Waste Application under separate cover after approval of this permit request.

USED OIL PROCESSING FACILITY PERMIT APPLICATION

Part I

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

A. General Information

1. New X Renewal _____ Modification _____ **Date current permit expires _____**

2. Revision number 1

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

_____ Generators (Subpart C of Part 279)
X Transporters (Subpart E)
_____ Burners of off-spec used oil (Subpart G)
_____ Marketers (Subpart H)
X are disposing of used oil (Subpart I)

4. Date current operation began: March 2014

5. Facility name: Universal Environmental Solutions, LLC (UES)

6. EPA identification number: FLR00019980

8. Facility mailing address:

P.O. Box #76105	Tampa	Florida	33605
Street or P.O. Box	City	State	Zip Code

9. Contact person: Ed Kinley Telephone: (813) 241-9206

Title: Facility Owner/Operator Email ekinley@uestampa.com

Mailing Address:

P.O. Box #76105	Tampa	Florida	33675
Street or P.O. Box	City	State	Zip Code

10. Operator's name: Ed Kinley Telephone: (813) 241-9206

Mailing Address:

P.O. Box #76105	Tampa	Florida	33675
Street or P.O. Box	City	State	Zip Code

11. Facility owner's name: Ed Kinley Telephone: (813) 241-9206

Mailing Address:

P.O. Box #76105	Tampa	Florida	33675
Street or P.O. Box	City	State	Zip Code

12. Legal structure:

X Corporation (indicate state of incorporation) Florida
_____ Individual (list name and address of each owner in spaces provided below)
_____ Partnership (list name and address of each owner in spaces provided below)
_____ Other, e.g., government (please specify) _____

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

Name: _____
Mailing Address:
_____
Street or P.O. Box City State Zip Code

Name: _____
Mailing Address:
_____
Street or P.O. Box City State Zip Code

Name: _____
Mailing Address:
_____
Street or P.O. Box City State Zip Code

Name: _____
Mailing Address:
_____
Street or P.O. Box City State Zip Code

13. Site ownership status: [☐] owned [☐] to be purchased [☐] to be leased ____ years
[■] presently leased; the expiration date of the lease is: in perpetuity

If leased, indicate: Land owner's name: Hendry Corporation
Mailing Address:
1650 Hemlock Street Tampa Florida 33605
Street or P.O. Box City State Zip Code

14. Name of professional engineer Keith Coats Registration No._____
Mailing Address:
2608 South 86th Street Suite B Tampa Florida 33619
Street or P.O. Box City State Zip Code
Associated with: Seavy & Associates, Inc.

B. SITE INFORMATION

1. Facility location:
County: Hillsborough
Nearest community: Palmetto
Latitude: 27.93855 Longitude: 82.44129
Section: 19 Township: 29 South Range: 19 East
UTM # 17 / 358200 / 3091231 /_____

2. Facility size (area in acres): 1.29 Acres

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.

The facility's detailed process description is labeled as Attachment 1

C. OPERATING INFORMATION

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

2. List applicable EPA hazardous waste codes:

N/A

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

A brief description of the facility operation is labeled as Attachment 2

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

The facility's detailed process description is labeled as Attachment 3

5. The following parts of the facility's operating plan should be included as attachments to the permit application. [See item five (5), page four (4) of the instructions.]

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

The analysis plan is labeled as Attachment 4

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

Sludge, residue and byproduct management description is labeled as Attachment 5

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

The tracking plan is included as Attachment 6

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

The preparedness and prevention plan is labeled as Attachment 7

7. Attach a copy of the facility's Contingency Plan. This requirement should describe emergency management personnel and procedures and may be met using a modifying or expounding on an existing SPCC plan or should contain the items listed in the Specific Instructions. [See item seven (7), page five (5) of the instructions.]

The contingency plan is labeled as Attachment 8

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

The unit management description is labeled as Attachment 9

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

The closure plan is labeled as Attachment 10

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

A description of employee training is labeled as Attachment 11

APPLICATION FORM FOR A USED OIL PROCESSING PERMIT

PART II - CERTIFICATION

TO BE COMPLETED BY ALL APPLICANTS

Form 62-710.901(6) Operator Certification

Facility Name: UES, LLC EPA ID# FLR000199802

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gathered and evaluated the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment or knowing violations. Further, I agree to comply with the provisions of Chapter 403, Florida Statutes, Chapters 62701 and 62-710, F.A.C., and all rules and regulations of the Department of Environmental Protection

Signature of the Operator or Authorized Representative*

_____

Ed Kinley President/Owner/Operator
Name and Title (Please type or print)

Date: 10/16/14 Telephone: (813) 241-9206 X-18

* If authorized representative, attach letter of authorization.

APPLICATION FROM FOR A USED OIL PROCESSING PERMIT

PART II - CERTIFICATION

Form 62-710.901(6) Facility Owner Certification

Facility Name: UES, LLC EPA ID# FLR00019980

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

Signature of the Operator or Authorized Representative*

_____

Ed Kinley President/Owner/Operator Name and

Title (Please type or print)

Date: 10/16/2014 Telephone: (813) 241-9206 -183

* If authorized representative, attach letter of authorization.

APPLICATION FROM FOR A USED OIL PROCESSING PERMIT

PART II - CERTIFICATION

Form 62-710.901(6) Land Owner Certification

Facility Name: UES, LLC EPA ID# FLR00019980

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

Signature of the Operator or Authorized Representative*

_____

Ed Kinley President/Owner/Operator

Name and Title (Please type or print)

Date: 10/16/14 Telephone: (813) 241-9206 X-18

* If authorized representative, attach letter of authorization.

APPLICATION FORM FOR A USED OIL PROCESSING PERMIT

PART II - CERTIFICATION

Form 62-710.901(6) P. E. Certification [Complete when required by Chapter 471, F.S. and Rules 62 - 4.050, 62-761, 62-762, 62-701 and 62-710, F.A.C.]

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

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

Please Print or Type

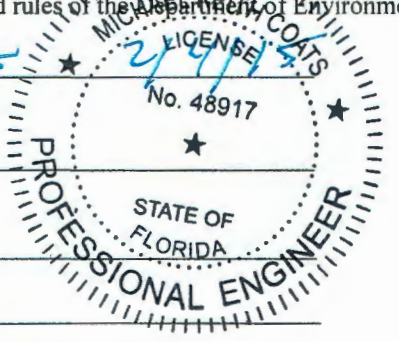
NO _____ Initial Certification No _____ Recertification

1. DEP Facility ID Number: FLR00019980 2. Tank Numbers: 8

3. Facility Name: UES, LLC

4. Facility Address: 1650 Hemlock Street Tampa Florida 33605

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



Signature

Michael K. Coats

Name (please type)

Florida Registration Number: 48917

Mailing Address: 2608 South 86th St Ste B

City Tampa State FL Zip 33619

Date: 02/04/2015 Telephone (813) 917-9267

[PLEASE AFFIX SEAL]

8700-12FL - FLORIDA NOTIFICATION OF REGULATED WASTE ACTIVITY

DEP Waste Management Division–HWRS, MS4560
2600 Blair Stone Rd. Tallahassee, FL 32399-2400
(850) 245-8707

Date Received (for FDEP Official Use Only)

EPA ID: F L R 0 0 0 1 9 9 8 0 2

Please use the instructions document to complete this form

1. Reason for Submittal (all submitters must complete pages 1 and 2 and sign page 5. Pages 3 and 4, - complete as applicable)

Mark 'X' in the correct box: (must choose one if a notification)

- ☐ To provide initial notification (to obtain an EPA ID Number for hazardous waste, universal waste, used oil activities, or PCW activities).
- ■ To provide subsequent notification (to update status and facility identification information).
- ☐ To provide the final notification (closing) for the facility. (see instructions—must complete pages 1,2,5)

FL Registration(s) ☐ UW Mercury (see page 3) ☐ HW Transporter (see page 4) ■ Used Oil (see page 4)

2. Facility or Business Name

UNIVERSAL ENVIRONMENTAL SOLUTIONS, LLC

3. Facility Operator (List additional Operators in the comments section).

Name of Operator: ED KINLEY

Date became Operator: 07 / 03 / 13 ☐ New Operator (mm dd yy)

Street or P.O. Box: 1650 HEMLOCK STREET

Phone Number:

City or Town: TAMPA | State: FL | Zip Code: 33605 | Country (if not USA):

Operator Type: ■ Private ☐ Federal ☐ Municipal ☐ State ☐ County ☐ Other_____

4. Facility Physical Location Information (No P.O. Boxes)

■ Same address as #3 above or:

Physical Street Address: ☐ Vessel

City or Town: | State: | Zip Code:

County: | Country (if not USA):

5. Facility North American Industry Classification System (NAICS) Code(s) (at least 5 digits)

A. |__|__|__|__|__|__| (required) B. |__|__|__|__|__|__|

C. |__|__|__|__|__|__| D. |__|__|__|__|__|__|

6. Facility or Business Mailing Address

☐ Same address as #__ above or: Street or P.O. Box:

City or Town: | State: | Zip/Postal Code: | Country (if not USA):

7. Facility or Business RCRA Contact Person

■ Same address as #3 above or:

First Name: | Last Name: | Title:

Phone Number: | Extension: | E-Mail: | Fax:

Street or P.O. Box:

City or Town: | State: | Zip Code: | Country (if not USA):

8. Real Property (FL Land) Owner of the Facility's Physical Location (List additional owners in the comments section.)

■ Same address as #3 above or:

Name of Owner: HENDRY CORPORATION

Date became Owner: ___/___/___ ☐ New Owner (mm dd yy)

Street or P.O. Box: | Phone Number:

City or Town: | State: | Zip Code: | Country (if not USA):

Owner Type: ■ Private ☐ Federal ☐ Municipal ☐ State ☐ County ☐ Other_____

RCRA Hazardous Waste Status Notification or Out of Business Notification	EPA ID No.

9. RCRA Hazardous Waste Activities at this Facility: (Mark 'X' in all that apply):

(A) (1)Generator of Hazardous Waste

☐ Yes ■ No (Do not include Universal Waste or Used Oil)

If YES, Choose only one of the following three categories.

☐ **a. Large Quantity Generator (LQG):**
Generates in any calendar month 1,000 kilograms or greater per month (kg/mo) (2,200 lbs.) of non-acute hazardous waste; or Greater than 1 kg (2.2 lbs) of acute hazardous waste (at least once a year)

☐ **b. Small Quantity Generator (SQG):**
Generates in any calendar month greater than 100kg/mo but less than 1,000 kg/mo (>220 to <2,200 lbs.) of non-acute hazardous waste and/or 1 kg (2.2 lbs) or less of acute hazardous waste (at least once a year)

☐ **c. Conditionally Exempt SQG (CESQG):**
Generates in any calendar month 100 kg/mo or less (220 lbs.) of non-acute hazardous waste and 1 kg (2.2 lbs) or less of acute hazardous waste

In addition, indicate other generator activities that apply.

☐ d. Short-Term Generator (one-time, not on-going)
☐ e. Episodic: Not more than one-time per year: __SQG__LQG
☐ f. United States Importer of hazardous waste
☐ g. Mixed Waste (hazardous and radioactive) Generator

For Items 2 through 7, mark 'X' in all that apply.

(2) Treater, Storer, or Disposer of Hazardous Waste

(at your facility) Note: A hazardous waste permit may be required for this activity.

☐ a. Operating Commercial TSD
☐ b. Operating Non-Commercial TSD
☐ c. Non-Operating: Postclosure or Corrective Action Permit or Order (HSWA, etc.)

(3) ☐ Recycler of Hazardous Waste (at your facility)
Specify: ☐ Commercial ☐ Non-Commercial.
Note: A permit is required for storage prior to recycling.

(4) ☐ Exempt Boiler and/or Industrial Furnace
☐ a. Small Quantity On-site Burner Exemption
☐ b. Smelting, Melting, and Refining Furnace Exemption

(5) ☐ Person Authorized to Manage Conditionally Exempt Waste Generated at Other Facilities
Choose this management activity ONLY if you attach EITHER a copy of your application for such authorization OR the authorization you received from FDEP.

(6) ☐ Receives Hazardous Waste from Off-Site

(7) ☐ Underground Injection Control

10. Waste Codes for Federally Regulated Hazardous Wastes: List the waste codes of the Federal hazardous wastes handled at your facility. List them in the order they are presented in the regulations (e.g., D001, D003, F007, K019, P012, U112).

Hazardous waste transporters list codes routinely or usually transported. Use comments or an additional page if more spaces are needed.

1	*2*	*3*	*4*	*5*	*6*	*7*
8	*9*	*10*	*11*	*12*	*13*	*14*
15	*16*	*17*	*18*	*19*	*20*	*21*

11. Other Status Changes (If no longer handling waste or closed, sections 9 and 10 should be blank and skip Section 12-16):

(A) Non-Handler of Regulated Waste at This Facility (Sections 9, 10 and 12-16 should be blank.)

☐ (1) Business no longer generates, transports, treats, stores, disposes of, or otherwise handles any regulated waste.

(B) Facility Closed (Complete this section only if all business activities at this facility have ceased.)

☐ (1) Closed at this location and moved or moving to another - Submit a new Form 8700-12FL for the new location if you will

☐ (2) Out of Business - Business closed on _____ (date)

☐ **(C) Property Tax Default** ☐ **(D) Petition for Bankruptcy Protection**

12-14 — Registration Activities Contact Information (only if this submission is a registration or registration information update):

■ Same as Facility RCRA Contact on page 1 or enter:

Contact for:
☐ HW Transporter
■ Used Oil Handler
☐ Universal Waste

First Name:	Last Name:	Title:
Phone Number:	Extension:	E-Mail:
Street or P.O. Box:		
City or Town:	State:(Country):	Zip Code:

Universal Waste Notification and Mercury Transporter/Handler Registration	EPA ID No.

12. Universal Waste (UW) Activities (Mark 'X' and complete all that apply) :

A. Federal Notification

☐ **Federally Defined Large Quantity Handler (LQH) = Generate/Accumulate: 5,000 kg (11,000 lb) or more of any combination of UW accumulated (at any one time)**

Accumulates: ☐ **a. UW Batteries** ☐ **b. Pesticides** ☐ **c. Pharmaceuticals** ☐ **d. Mercury Containing Devices** ☐ **e. Mercury Containing Lamps**

☐ **Destination Facility for UW** Note: For this activity, a facility must treat, dispose or recycle a UW. A permit is required for storage prior to recycling.

B. Florida Universal Pharmaceutical Waste (UPW): one-time registration

☐ Pharmaceuticals **LQH** = 5,000 kg or more of Universal Pharmaceutical Waste (UPW) accumulated (at any one time)

☐ Pharmaceuticals **Acute LQH** = more than 1 kg (2.2 lb) of acutely hazardous ("P-listed") pharmaceutical waste (UPW) accumulated

☐ **Reverse Distributor** of Universal Pharmaceutical Waste (UPW) (must be registered with the Florida Department of Health [DOH])

☐ Florida Universal Pharmaceutical Waste (**UPW**) Transporter

C. Florida Annual Mercury Handler Registration:

For-hire transporters, transfer facilities, handlers, reclamation and recovery facilities of Mercury-Containing Lamps and Devices operating in the State of Florida are required to register annually with the Department using this section of the form [Chapter 62-737, F.A.C.]. A one-time fee of $1,000 is required for first time registration as a Large Quantity for-hire Handler of Mercury-Containing Lamps and Devices as detailed in 62-737.400(3)(a)3. (please contact FDEP first).

If you only generate lamps and/or devices or manage pharmaceuticals, do not register or complete the information below.

(1) This form is being submitted as a Florida Registration of Universal Waste Transporter/Handler for-hire Activities

☐ First time registering ☐ Renewal ☐ One-time $1,000 fee for Mercury for-hire first time LQH registration is attached

☐ For-hire **Transporter** of Universal Waste Mercury-Containing Lamps or Devices ☐ For-hire **Transfer Facility** of Universal Waste Mercury-Containing Lamps or Devices ☐ Mercury-Containing Devices (thermostats, etc) **SQH** = less than 100 kg accumulated by for-hire handler ☐ Mercury-Containing Lamps **SQH** = less than 2,000 kg (8,000 lamps) accumulated by for-hire handler	Annual Registration Required
☐ Mercury-Containing Devices **LQH** = 100 kg (220 lb) or more accumulated at any one time by for-hire handler ☐ Mercury-Containing Lamps **LQH** = 2,000 kg (4400 lbs/8,000 lamps) or more accumulated by for-hire handler	Annual Registration + one- time $1,000 fee+ More Requirements (contact FDEP)
(2) Mercury Recovery and/or Reclamation Facility (A hazardous waste permit is required for this activity) ☐ First time registering ☐ Renewal	Annual Registration Required

Briefly Describe your Universal Waste Activities: ☐ We use Drum Top Bulb Crusher(s).

13. Other State Regulated Waste Activities: **Petroleum Contact Water (PCW)** ■ **Recovery** ■ **Transport** [62-740 F.A.C.]

Note: A water facility permit may be required for this activity. An annual report is required for a recovery facility pursuant to Rule [62-740.300(5)]

Hazardous Waste and Used Oil Transporter Registrations	EPA ID No. FLR000199802

14. HW Transporter Activities: (Mark 'X' and complete all that apply if you need to register your HW Transporter activities)

Transporters of and Transfer Facilities for Hazardous Waste in the State of Florida are required to register and annually renew their registration. Evidence of casualty/liability insurance pursuant to 62-730.170(2)(a) is required in addition to this registration. Transfer facilities must submit several additional documents as detailed on page 5 the first time they register and when the information changes. Registered transporters and transfer facilities may only begin operations after receiving approval from the Department.

Generators of hazardous waste who transport waste only within the boundaries of their facility should not register.

A. HW Transporter Registration Information (must be completed annually and when this information changes)

This facility is a registered transporter of hazardous waste.

This form is: ☐ **Initial Registration** ☐ **Renewal** ☐ **Notification of changes** ☐ **Cancel Registration**

☐ 1. For own waste only ☐ 2. For commercial purposes ☐ 3. Both commercial and own waste

4. **Transportation Mode** ☐ Air ☐ Rail ☐ Highway ☐ Water ☐ Other - specify _____

B. HW Transfer Facility Registration Information (must be completed annually and when this information changes)

☐ **This facility is a Hazardous Waste Transfer Facility: (at this location)** Storage Volume _____

This form is: ☐ **Initial Registration** ☐ **Renewal** ☐ **Notification of changes** ☐ **Cancel Registration**

Note: Hazardous Waste transfer facilities must comply with the requirements of Rule 62-730.171, F.A.C., and Rule 62-730.182, F.A.C.

The Transfer Facility records required under the provisions of Rule 62-730.171(6), F.A.C., are kept at (check one):
☐ Our mailing (business) address ☐ The site (facility) address

Please enter the EPA ID Number of the HW Transporter who carries the insurance for this Transfer Facility: | | | | | | | | | | | | |

Please see the top of page 5 for additional items that must he suhmitted in addition to the ahove registration for Hazardous Waste Transfer Facilities [Rule 62-730.171(3), Florida Administrative Code (F.A.C.)]:

15. Used Oil and Oil Filter Activities: : (Mark 'X' and complete all that apply if you need to register your used oil activities),

Transporters (exemptions in 40 CFR 279.40(a)(1-4), transfer facilities, processors, off-specification burners, and/or marketers must annually register with the Department using this form. All except Florida used oil (UO) Processors and collection centers must pay an annual $100 registration fee.

This form is: ☐ **Initial Registration** ☐ **Renewal** ■ **Notification of changes** ☐ **Cancel Registration**

■ If applicable, a check or money order, in the amount of $100, payable to Florida Department of Environmental Protection is enclosed.

(1) Used Oil Transporter - mark activities: (occurring in Florida)
- ■ a. Transporter (off-site) and noncontiguous locations
- ■ b. Transfer Facility

(2) ☐ Collection Center (From businesses, no more than 55 gal per shipment)

(3) ■ Used Oil Processor (A permit is required.)

(4) ☐ Off-Specification Used Oil Burner

(5) Used Oil Fuel Marketer ☐ On-Spec ■ Off-Spec

(6) Used Oil Filter Management (must annually register)
- ■ a. Transporter
- ■ b. Transfer Facility
- ■ c. Processor (Annual Report Required)
- ☐ d. End User

(7) The records required under the provisions of Rule 62-710.510, FAC, are kept at (check one):
■ Our mailing (business) address ☐ The site (facility) address

Please see the top of page 5 for additional items that must be submitted in addition to the above registration and fees required for non-exempt Used Oil Transporters.

Transfer Facility and Used Oil Transporter requirements and required signature page	EPA ID No.

(14 cont.) Hazardous Waste Transfer Facilities: In addition to the registration required for Transfer Facilities on Page 4, Section 14, the following items are required to be submitted with the initial notification for a transfer facility and any changed items must be submitted with any subsequent submission [Rule 62-730.171(3), Florida Administrative Code (F.A.C.)] :

__Certification by a responsible corporate officer of the transporter that the proposed location satisfies the criteria of Section 403.7211(2), Florida Statutes (F.S.) [Rule 62-730.171(3)(a)1., F.A.C.]

__Evidence of the transporter's financial responsibility [Rule 62-730.171(3)(a)3., F.A.C.]

__A brief general description of the transfer facility operations [Rule 62-730.171(3)(a)4., F.A.C.]

__A copy of the facility closure plan [Rule 62-730.171(3)(a)5., F.A.C.]

__A copy of the contingency and emergency plan [Rule 62-730.171(3)(a)6., F.A.C.]

__A map or maps of the transfer facility [Rule 62-730.171(3)(a)7., F.A.C.]

(15 cont.) Used Oil Transporters: (Exemptions in 40 CFR 279.40(a)(1-4))

In addition to the requirements on Page 4 Section 15:

- ALL registered UO Handlers must submit an annual report except generators transporting UO from noncontiguous operations within their own company.
- UO transporters transporting off-site over public highways only within their own company must submit proof of insurance.
- UO transporters transporting more than 500 gallons/year must submit proof of insurance annually, and must sign and certify this submission as a certified used oil transporter in section 17 (except those exempted by Rule 62-710.600(1), F.A.C.):.

■ The used oil annual report is attached ■ Evidence of Liability Insurance pursuant to 62-710.600(2)(e)., F.A.C. is attached.

16. Comments (attach a page if more space is needed):

17. Certification: I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. The information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

■ **I certify as a Used Oil Transporter** that I am familiar with the applicable Florida and Federal laws and rules governing used oil transportation and have an annual and new employee training program in place covering the applicable used oil rules. Evidence of financial responsibility is demonstrated by the Used Oil Transporter Certificate of Liability Insurance, DEP form 62-730.900(5)(a), F.A.C..

Signature of owner, operator, or an authorized representative	Print Name and Title	Used Oil	Date Signed (mm-dd-yyyy)
E. Kinley	ED KINLEY (PRES.)	■	12/15/2014
		❑	
		❑	

If the person that filled in this form is not the Facility Contact or Operator, please complete the information below:

(Name of person completing this form) (Phone Number) (E-mail Address)

TABLE OF CONTENTS

ATTACHMENT 1 – PERMIT ATTACHMENT STRUCTURE & FACILITY'S DETAILED PROCESS DESCRIPTION

1.0 UES Used Oil Processing Permit Submission Attachment Structure

The attachments contained in this submission package are to be utilized as one document designed to meet the requirements for information about the UES facility, facility process, operators, owners, best management practices, and historical data and surrounding properties. The following Attachments are included in the submission:

Attachment # Page #

1.1 Detailed Facility Process Figures

The following scaled figures, and site photos depict the site location, facilities location of all past, present and future material and waste receiving, storage and processing areas. Process flow information is included in Section 1.3

1.1.0 Figure -1 - USGS Site Information and 100 Year Flood Plane Map The USGS map depicts the site location and 2000 foot radius. General Notes include UTM, site coordinates, neighborhood name, elevation data and plat map data. The Palmetto Beach neighborhood is located approximately 2,000 feet to the east of the facility and the Sparkman Channel is located approximately 800 feet to the west.

1.2 Aerial Site Photo Maps 2002, 2012, and 2014

Aerial photos taken from 2002, 2012 and 2014 depict the sites transition from a TECO power plant into a support area for shipbuilding and maintenance activities. The 2014 aerial photo shows the completed plant and details site features.

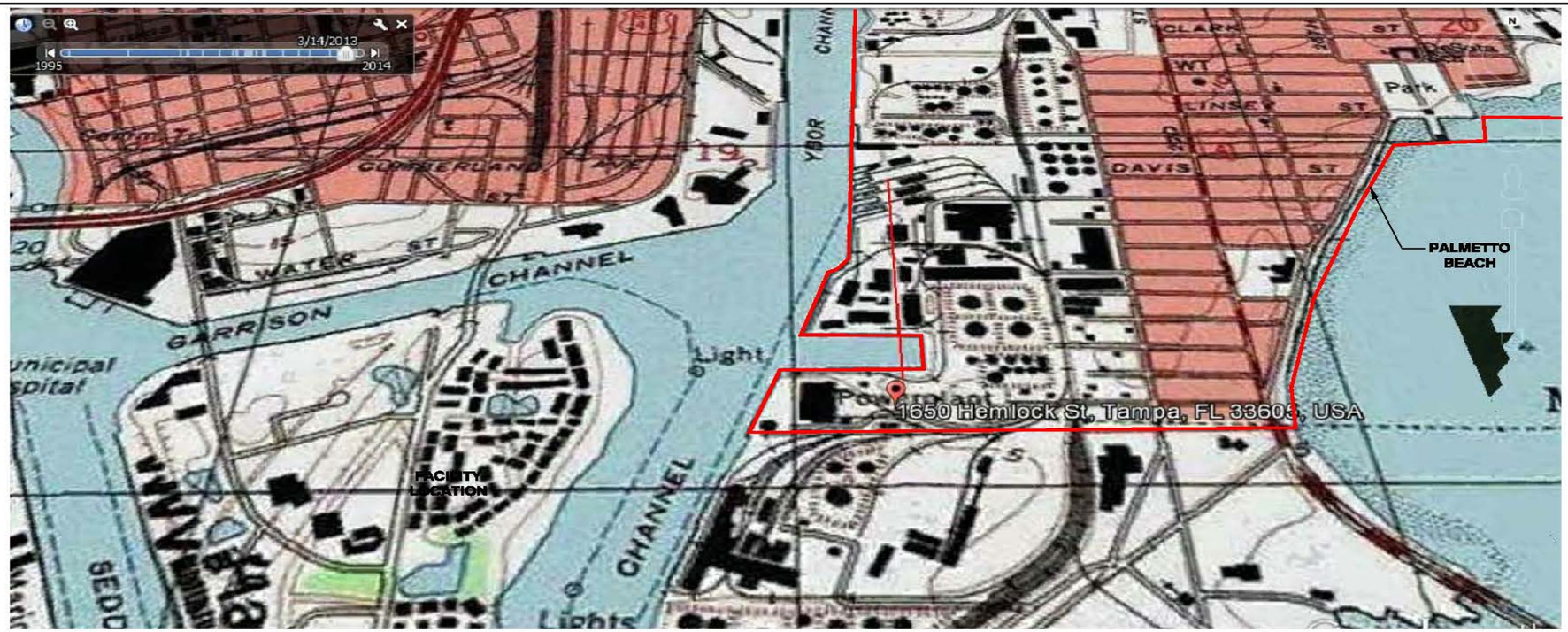
1.3 Permit Reference Figures and Maps

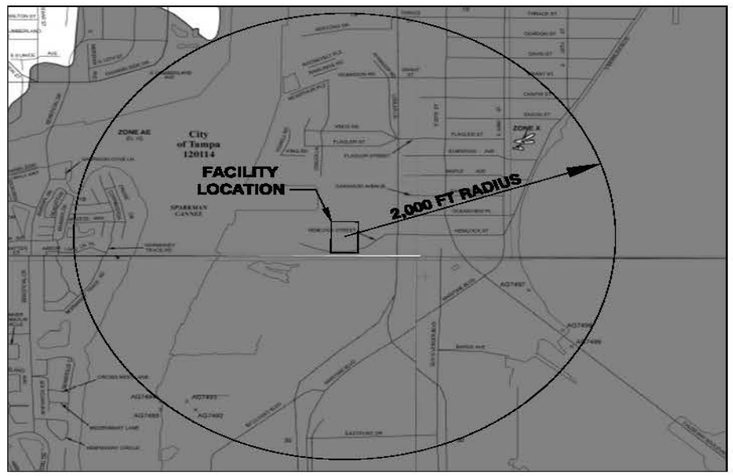
The Following site plan and map is included to detail information in Attachment 1 through 10.Waste Management Unit Designators are included on **Figure 1.3.1**. Emergency evacuation routes and meeting places as well as the location emergency safety and spill equipment is included on **Figure 1.3.2**. Incoming and outgoing material and waste traffic pattern is located in **Figure 1.3.3**. Containment capacity volumes and controls are located in **Figure 1.3.4** and **Figure 1.3.5.** These figure and maps (1.3.1a, 1.3.1b, 1.3.1c,1.3.1 and 1.3.1e) will be referenced throughout this permit submission document are provided to differentiate between figures provided within attachments that contain stand-alone document figures contained within these permit attachment.

1.3.0.1 Site Location Map – The Site Location Figure depicts the site area including the pretreatment system area of extents, and acreage estimates. Surveyor's contour data is included in this figure.

1.3.0.2 Site Plan – The site details location of buildings and structures onsite. Process Flow information is detailed in **Section 1.3** and process flow figure depicts waste management area unit designators, dimensioned containment areas, tank labels and sizes, process piping and flow direction as well as fencing, fence gate, pipeline flow direction and equipment identifiers.

Figure -1.1.0 - USGS Site Information and 100 Year Flood Plane Map





100 YEAR PLAIN AREA
HILLSBOROUGH COUNTY, AUGUST 28, 2008
MAP NO. 12057C0354H, MAP NO. 12057C0358H
MAP NO. 12057C0362H, MAP NO. 12057C0366H

N
0
500
1000
SCALE IN FEET

GENERAL NOTES:

1. PALMETTO BEACH
2. 27.93855°N - 82.44129°E
3. ELEVATION = 1.3M
4. SECTION 19, TOWNSHIP 29 SOUTH, RANGE 19 EAST.
5. UTM # 17/358200/3091231.

SEAVY & ASSOCIATES, INC.
2608 South 86th Street, Suite B
Tampa, FL 33619

DRAWING TITLE: USGS SITE INFORMATION AND 100 YEAR FLOOD PLAIN MAP

PROJECT TITLE: UES OIL PROCESSING PERMIT APPLICATION REVISION 0

CLIENT: HENDRY CORPORATION
1650 HEMLOCK STREET
TAMPA, FL 33605

Keith Coote P.E.
P.E. No. 42917
CERTIFICATE OF AUTHORIZATION NO. 9528
PHONE (813)917-9257
FAX (813)630-1607

BY	REVISIONS

DESIGNED BY J.S.
DRAWN BY R.M.
CHECKED BY J.S.
DATE 10-13-14
SCALE AS SHOWN
PROJECT NO. 3120
SHEET 1 of 3
1

Figure 1.2 Aerial Site Photo Maps 2002

Figure 1.2 - Aerial Site Photo Maps 2012

Figure 1.2 Aerial Site Photo Maps 2014

1.3.0.1 Site Location Map –

1.3.0.2 Site Map –

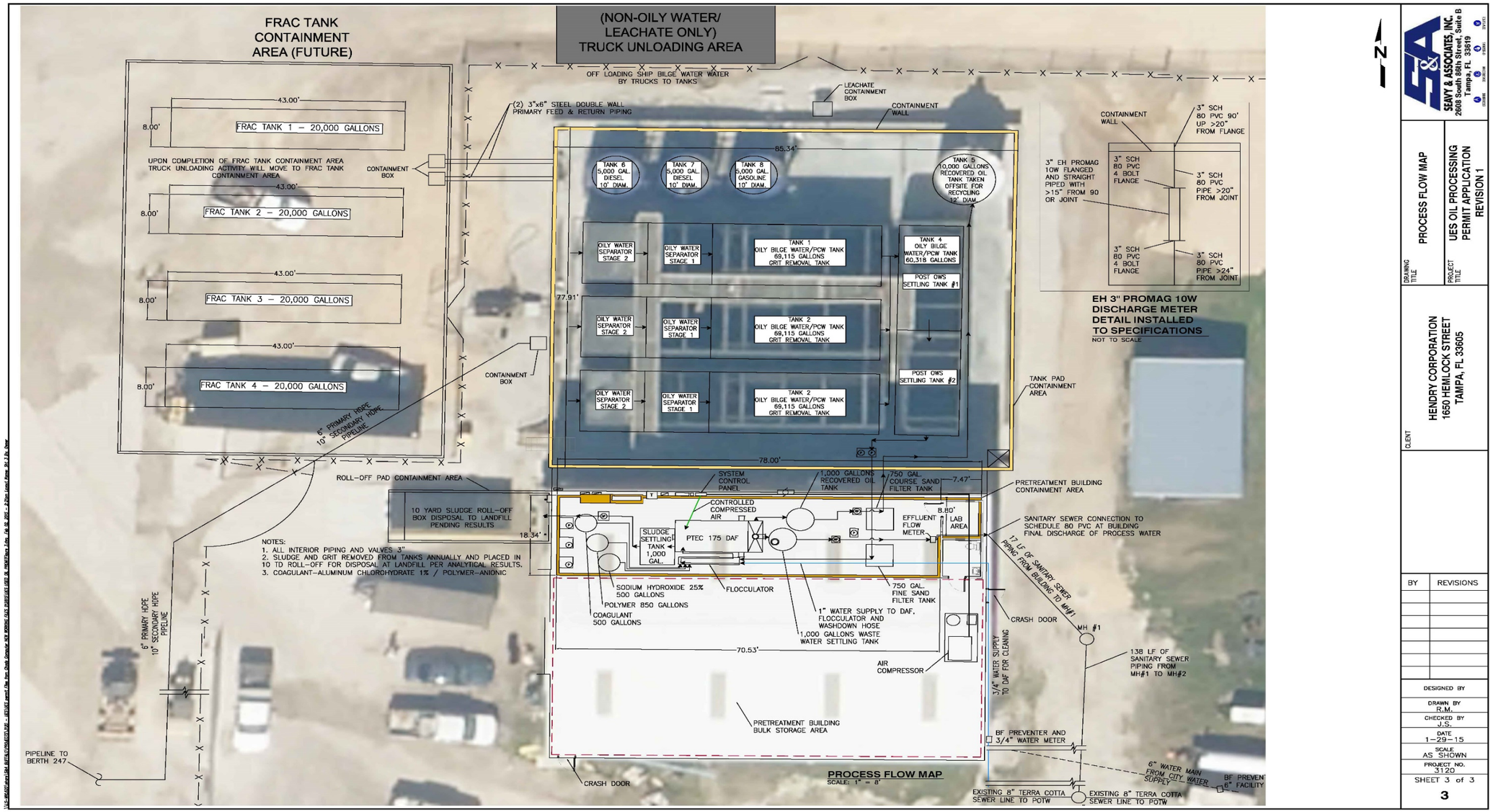


Figure 1.3.1 Permit Reference Figure – Unit Designators

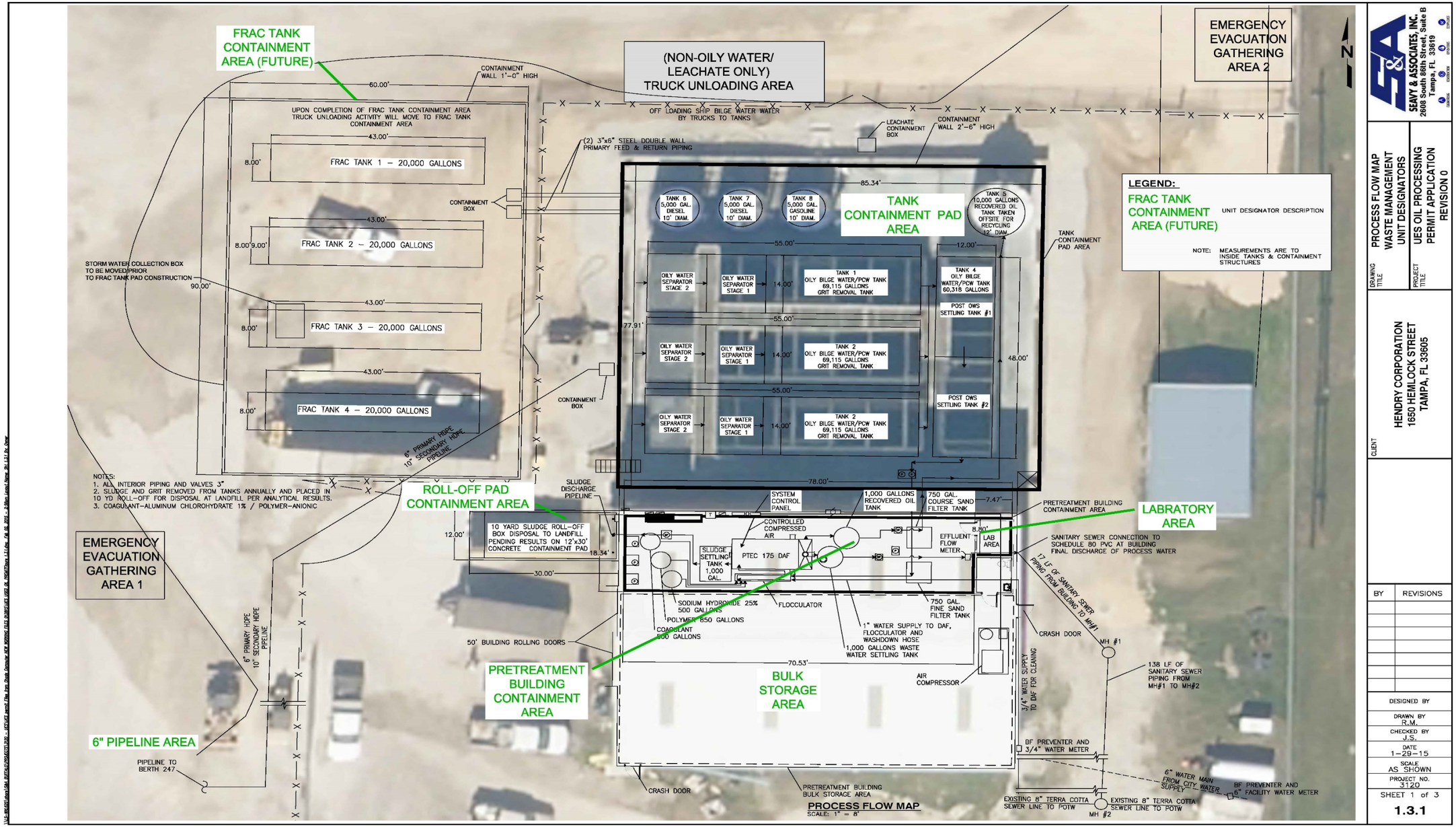


Figure 1.3.2 Permit Reference Figure – Emergency Evacuation Route and Emergency Spill Kit / Safety Kit Locations

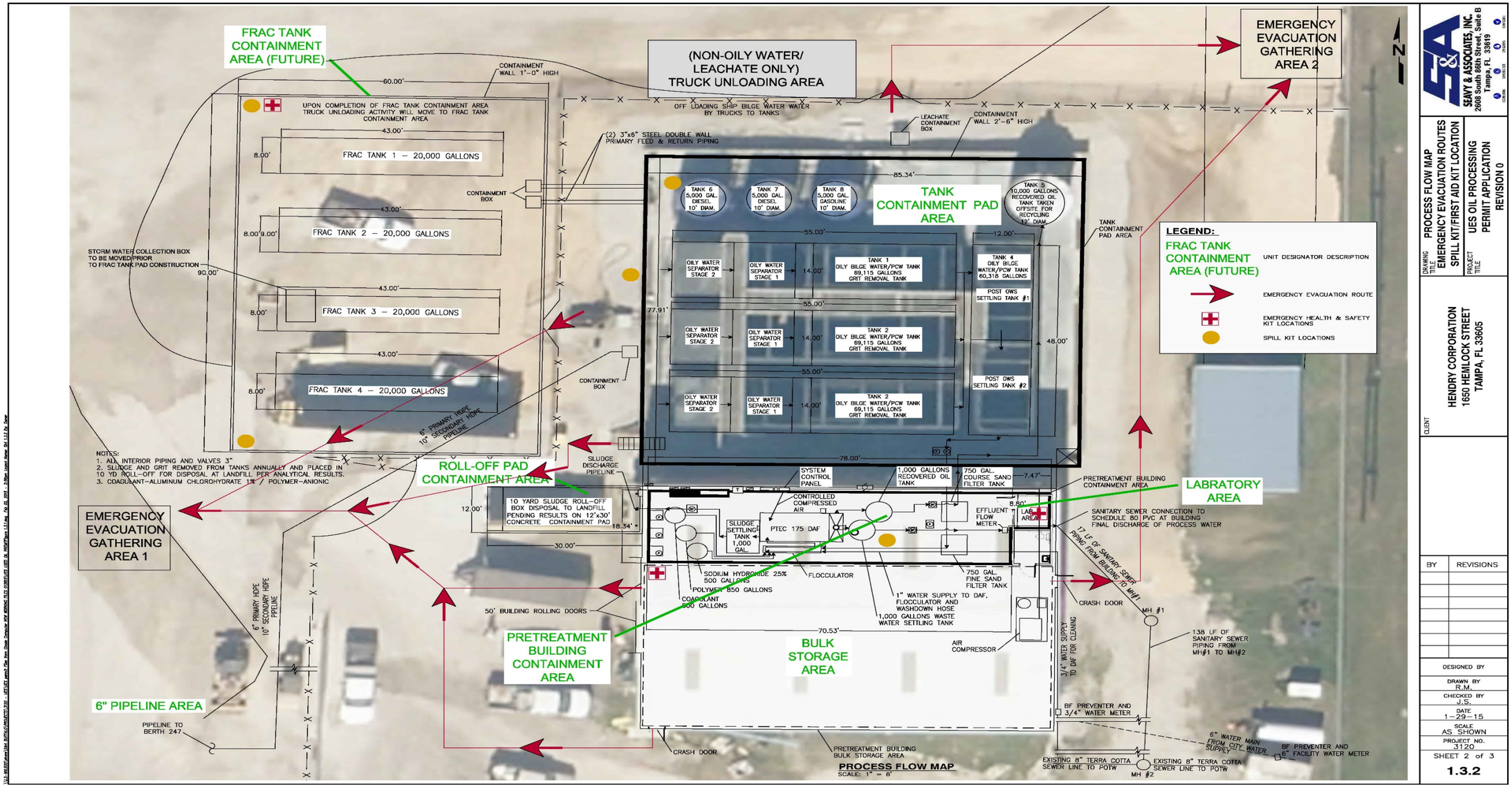


Figure 1.3.3 Permit Reference Figure – Traffic Flow Patterns & Containment Capacity Summary

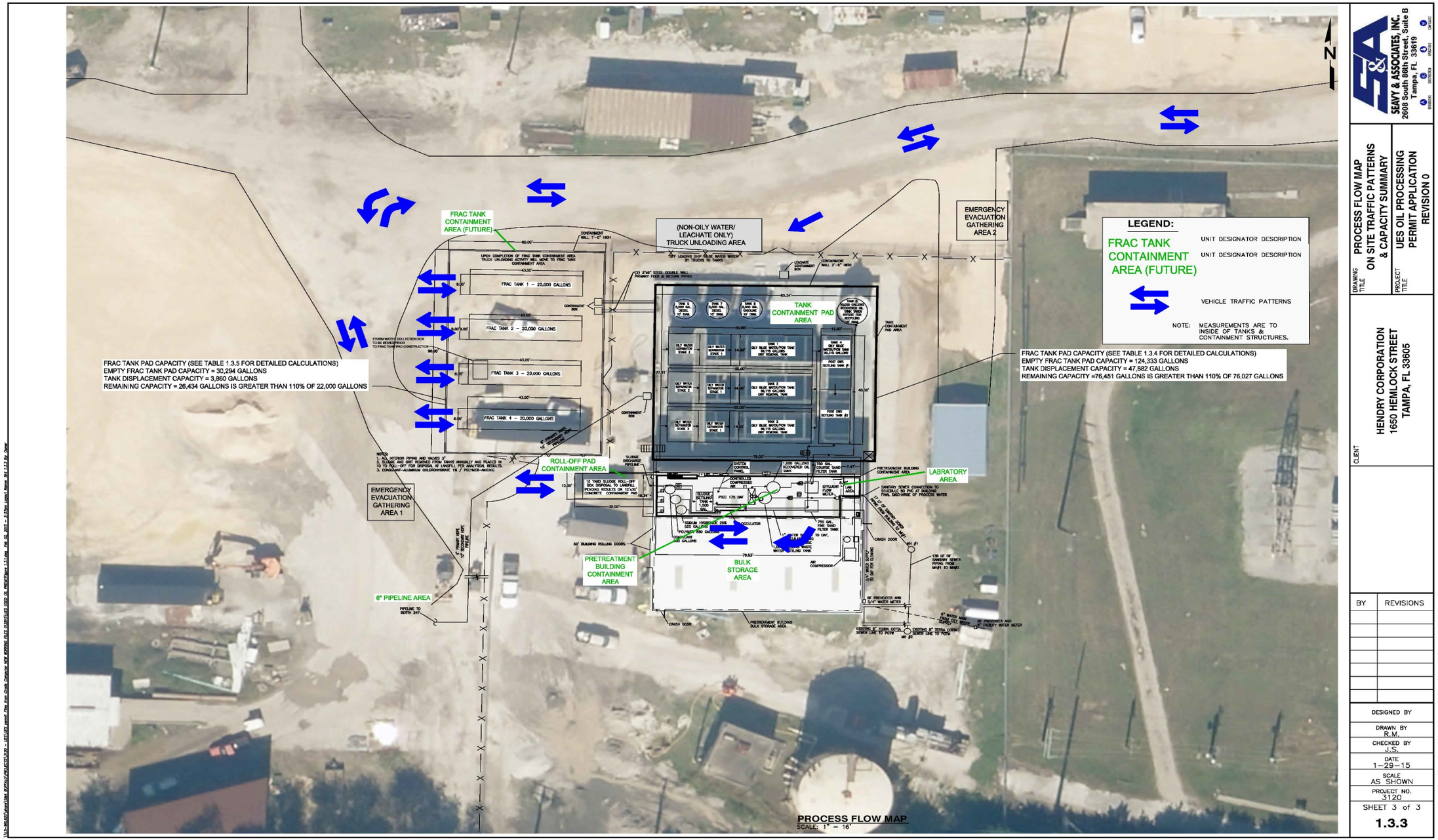


Figure 1.3.4 Permit Reference Figure – Tank Containment Pad Capacity Calculations

1.3.4 UES Used Oil Processing Facility Containment Pad Capacity Calculations

Unit Designator	**Tank Containment Pad Area**	**Date:**	**1/27/2015**
Calculation Type	**Multiple Tanks and Types**		
Date of dike construction	10/25/2013	ID # of largest pesticide tank	Tank #1
Is dike protected from rain (Y/N)?	N	Capacity of largest tank (gal)	69,115

	Tank Pad Capacity	Quick Conversions
	Dike part 1	1" = .08'
Length (ft)	85.34	2" = .16'
Width (ft)	77.91	3" = .25'
Height (ft)	2.50	4" = .33'
Volume (gal)	124333	5" = .42'
Total Volume (gal)	124333	6" = .50'

	Flat-Bottom Tanks			Rectangle or Square			
Tank ID and Size (Gallons) *Exclude largest tank **	**Tank Diameter (ft)**	**Height of cylinder below wall (ft)**	**Cylinder displacement volume (gal)**	**Length (ft)**	**Width (ft)**	**Height of tank below wall (ft)**	**Total tank displacement volume (gal)**
Tank 1: 69,115				Excluded	Excluded	Excluded	Excluded
Tank 2: 69,115				55.00	14.00	2.50	14,399
Tank 3: 69,115				55.00	14.00	2.50	14,399
Tank 4: 60,318				48.00	14.00	2.50	12,566
Tank 5: 10,000	12.00	2.50	2,114				2,114
Tank 6: 5,000	10.00	2.50	1,468				1,468
Tank 7: 5,000	10.00	2.50	1,468				1,468
Tank 8: 5,000	10.00	2.50	1,468				1,468

*Largest Tank Excluded, capacity already included in 110% capacity calculation

The following results are in gallons:

Capacity Calaculations	Gross Dike Capacity	110 % of Largest Tank	Displacement of Remaining Tanks	Required Dike Capacity	Remaining Dike Capacity After Tank Displacement	Available Capacity	Remaining Volume OK
	124,333	76,027	47,882	123,909	76,451	425	

Figure 1.3.5 Permit Reference Figure – Frac Tank Containment Pad Capacity Calculations

Figure 1.3.5 - UES Used Oil Processing Facility Containment Pad Capacity Calculations

Unit Designator	Frac Tank Containment Area	**Date:**	1/27/2015
Calculation Type	Multiple Tanks Single Type		
Date of dike construction	10/25/2013	ID # of largest pesticide tank	Frac #1
Is dike protected from rain (Y/N)?	N	Capacity of largest tank (gal)	20,000

	Frac Pad Capacity	Quick Conversions
	Containment Volumetric Calculations	1" = .08'
Length (ft)	60.00	2" = .16'
Width (ft)	90.00	3" = .25'
Height (ft)	0.75	4" = .33'
Total Volume (gal)	30294	5" = .42'
		6" = .50'

	Flat-Bottom Tanks			Rectangle or Square			
Tank ID and Size (gal) *Exclude largest tank **	**Tank Diameter (ft)**	**Height of cylinder below wall (ft)**	**Cylinder displacement volume (gal)**	**Length (ft)**	**Width (ft)**	**Height of tank below wall (ft)**	**Total tank displacement volume (gal)**
Frac 1: 20,000				Excluded	Excluded	Excluded	Excluded
Frac 2: 20,000				43.00	8.00	0.75	1,930
Frac 3: 20,000				43.00	8.00	0.75	1,930
Frac 4: 20,000				43.00	8.00	0.75	1,930

The following results are in gallons:

Capacity Calculations	Gross Dike Capacity	110 % of Largest Tank	Displacement of Remaining Tanks	Required Dike Capacity	Remaining Dike Capacity After Tank Displacement	Available Capacity	Remaining Volume OK
	30,294	22,000	5,790	27,790	24,504	2,504	

ATTACHMENT 2 – FACILITY DESCRIPTION

2.0 Facility Description

Universal Environmental Solutions, LLC (UES) has completed construction of its wastewater pre-treatment facility. UES is located in the Port of Tampa and its primary operation will be servicing the local shipyards. The project has been completed as pre-approved for construction under Service Request 07-03-12A. As detailed in the service request submittal, the treatment plant is designed to pre-treat various wastewater streams created from area shipyards. Other waste streams include, but are not limited to: cleaning and maintenance processes, environmental sampling and disposal activities, industrial process water separation systems, and contaminated storm water. All wastewater will be non-hazardous prior to treatment. **Attachment 6** describes the processes utilized by the plant operator to prevent entry of hazardous wastes into the plant. The operation has one Plant Operator, and one Plant Technician. Operations are Monday – Friday (0730 – 1600 hours).

2.1 Accepted Waste Streams

Below is a list of anticipated waste streams that the pre-treatment facility system has been designed to recycle:

2.1.1 - Bilge Oily Water – created by leaks of salt water, cooling water, fuel oil and lube oil, by the dewatering of sedimentation and sludge tanks, by the draining off of various cleaning processes and by particles of soot and dirt. BOW is typically a complex mixture of bilge water and chemicals used in ship maintenance and repair.

2.1.2 - Fuels, oils and grease residues - resulting from cleaning / purging of the cargo pipelines and tanks of vessels transporting petroleum products. Residuals include diesel fuel, gasoline, # 6 oil, crude oil, and shale oil.

2.1.3 - Fertilizer residues - resulting from the cargo tank cleaning of vessels that transport bulk fertilizers. This service is required when a vessel is changing cargoes to another commodity (i.e. Fertilizer to Animal Feed).

2.1.4 - Alumina residues - resulting from the cargo tank cleaning of vessels that transport bulk Alumina. This service is required when a vessel is changing cargoes to another commodity.

2.1.5 - Landfill leachate – wastewater/storm water from landfills requiring off site treatment. **NOTE**: This wastewater will be strictly limited to prior analyses (waste profile acceptance, bench test sample treatment results) as specified in wastewater discharge guidelines.

2.1.6 - Brine – process wastewater used for cooling in industrial applications.

2.1.7 - BOD / COD – commercially generated wastewaters with high concentrations of organic matter.

2.2 Waste Management Unit Designations

The pre-treatment facility consists of eight separate unit management designators. The designators were developed to describe distinct pre-treatment process locations. The designators will be used in the attachments contained within this permit submission. The unit designators are shown on **Figure 1.3.1** and highlighted in green. A description of each unit designators is listed below:

2.2.1 Tank Containment Pad Area – The containment pad area consists of an 85.34'x77.91'x2.5' concrete containment area located to the north of the pre-treatment building. This area contains the pre-treatment process tanks and piping as well as pumps, filters, valves, used oil storage tanks and used fuel storage tanks. The area is open to rainfall which is collected and pumped back into the process system via a sump located in the south east corner.

2.2.2 Pre-Treatment Building Containment Area – The pre-treatment building is located to the south of the containment pad. The containment area consists of an 80'x40'x1' containment wall. The area houses the pre-treatment equipment consisting of sludge settling tank, used oil tank, process settling tank, flocculent and process piping and meters, dosing pumps, sodium hydroxide, polymer and flocculent tanks, Dissolved Air Floatation system (DAF), air pumps, electric pumps, control system. The area is 100% under cover of the building roof and receives no rainfall.

2.2.3 Bulk Storage Area – The Bulk Storage Area is located to the south of the pre-treatment building containment area and consists of a concrete pad. Bulk non-hazardous wastes are store inside of the building in drums or totes. The drums and totes are characterized and sent off for disposal or recycling.

2.2.4 Lab Area – The lab area is located in the northeast area of the pre-treatment building. The lab room is a 10'x10' lab room that houses laboratory testing equipment, regents, documents, records and manifest. The facility operator's office equipment including a computer and printer is located in this area.

2.2.5 Roll Off Area – The roll off area is located to the west of the pre-treatment building in the north corner. The roll off area consists of a roll off pad and containment wall, sump for removal of rainwater and a dedicated 10 yard roll off that is used to collect and dispose of the sludge's and sediments from processing of oily waters. The rainwater is pumped to the sump located in the tank containment pad area and into the process tanks for treatment.

2.2.6 Truck Unloading Areas – The Truck Unloading Areas are located to the north and west of the Tank Containment Pad area. The unloading area to the west of the containment pad is utilized to unload bulk tanker trucks through a pump located on the east side of the containment pad. The unloading area located to north of the containment area is utilized to load and unload none oil impacted leachate water. Both Unloading areas will no longer be in use upon completion of the frac Tank Storage Area in March 2015.

2.2.7 Frac Tank Storage Area – The Frac Tank Storage Area design will include an impervious concrete pad. The frac tank storage area is located on the northwest side of the tank containment

pad area. The frac tank containment area design consists of a sloped 90'x60'x0.75' pad and will store up to four 20,000 frac tanks. The frac tanks are utilized for additional storage of used oils and process oily water that requires additional treatment or filtration. Rainfall and water collected in the frac tank storage area is collected in a sump located in the south east corner of the pad. The sump contains a pump that transfers the water to the tank containment pad sump and into the treatment system tanks for processing and disposal to the POTW.

2.2.8 Pipeline Area – The Pipeline Area is located to the west of the containment pad, it consist of an 6" primary, 10" by 800' doubled walled HDPE pipeline from Berth 247 to the truck unloading area piping and into the plant for processing. The pipeline runs from berth 247 underground in the old abandoned 15" stormwater pipe for added protection and additional spill containment protection.

2.3 Facility Non-hazardous Waste Disposal Processes

The pre-treatment of oily waters results in several waste streams that require disposal. The following list details non-hazardous waste streams that require disposal.

2.3.1 Sludge Waste – Sludge's and sediments are created from the processing of oily water and oily water waste streams are collected in the bottom of the primary holding tanks, of the DAF system. Other sources of sludge wastes are created from cleaning and maintenance processes. These wastes are pumped to the roll off, then characterized, manifested and disposed offsite.

2.3.2- Used/Recycled Oils – Used oils are separated from the DAF process and collected in the used oil tank located on the tank containment pad area. The oils are sent offsite to be recycled.

2.3.2- Maintenance Solid Wastes – Materials and rags used for cleanup of spilled materials are collected in drums and sent off for disposal at the local incinerator. It is estimated that operations will produce one drum of maintenance solid waste per quarter.

ATTACHMENT 3- DETAILED PROCESS FLOW DESCRIPTION

3.0 DETAILED DESCRIPTION

The following detailed description should be used in conjunction with details provided in the attached **Section 3.4** -Attachment A – Process Flow Diagram the Process Flow Plan provided. The attached site plan depicts location and transmission points for the various process descriptions described in the sections below.

3.1 Pre-Treatment System Components Description

Plant components were selected based on a progressive pre-treatment design. The components were sized and selected based on previous data available from operations conducted at the shipyard. The specific plant equipment processes will be discussed in **Section 3.0** and the operation of these processes will be detailed in **Section 4.0**. An equipment and process diagram is attached as **Section 3.4** to clarify process flow and equipment location and layout. Two areas house the pre-treatment process equipment, process storage, solid waste storage and primary piping and pumps are located outside on the concrete containment pad and dosing, DAF and filtration systems, secondary piping and the lab are locate in the pre-treatment system warehouse. The following equipment is installed to complete wastewater pre-treatment processes:

3.1.1 Offloading & Piping – Offloading of trucks will be conducted on the west side of the plant in the frac tank storage area. Trucks with wastewater will offload using a 3" cam-locked and valved flexible hose to 3" plant piping connection inside of a double walled containment box. The containment box has two connections, one for trucks with pumps and one for trucks that require a pump to offload. The plant operator will make the proper connection and direct the wastewater to appropriate primary storage tank. Tank selection will be based on several factors: type of wastewater, required treatment, similarity to existing tank contents, batch and cleaning schedule and settling time required.

3.1.2 Storage Tanks & Roll-Off – The tank farm consists of 4 steel tanks, three of the tanks have an estimated 69,115 gallon capacity each. These three tanks are configured with two oily/water separators each and a primary large to medium grit and sediment settling chamber each. Each tank has an oily water separator capacity of 30,115 and a primary settling chamber or grit removal chamber has a capacity of 39,000 each. One secondary settling tank is piped in series with each of three oily water separators and has 48,600 gallon capacity. A 10,000 gallon reclaimed oily and process waste oil collection tank is located adjacent to the 4 tanks. A 20 yd roll-off is installed on a concrete containment pad located in front of the DAF process building for waste sludge collection. All tanks are installed within a re-enforced concrete containment system with a sump for collection and treatment of rainwater.

3.1.3 Pumps Systems – The pre-treatment plant utilizes 3 types of pumps to move process water from offloading to storage to treatment and discharge. Two 3" Hydromatic 150 gpm self-priming pumps are installed on the containment pad and are utilized to offload trucks and transfer wastewater from storage tank system to storage tank system or pumped inside for process treatment, one 3" Hydromatic 150 gpm self-priming pump is installed on the discharge piping to

transfer wastewater. Four pneumatic positive displacement pumps are installed for waste processing storage and disposal. One 4" Wilden pump is installed in secondary containment at the influent of the plant for additional truck offloading. Two - 2" Wilden pumps are installed, one at the DAF process emulsified oils settling tank to transfer recovered emulsified oil to the 10K storage tank outside and one to supply the pre (coarse) and post (fine) treatment sand filter systems. One 3" Wilden pump is installed in the DAF process tank to pump sludge out the roll-off and settled process water back to the storage tanks. The DAF contains an air blending and mixing pump that is controlled by the DAF control panel.

3.1.4 Chemical Dosing & Flocculation – The plant's initial contact treatment consists of a chemical feed and dosing systems. Chemicals are injected into a pre-DAF Flocculator with two inline mixers and several sampling ports. Three LMI pump dosing pumps feed by storage tanks are installed and piped to inject and mix with the wastewater in the Flocculator. The three chemicals types selected for solids removal and DAF preparation of the wastewater are: **base, flocculent, and coagulant.**

3.1.5 Dissolved Air Floatation – The DAF installed for treatment is a PTEC 175. This DAF design utilizes state of the air blending pumps to create treatment surface area. The DAF is designed to process 100 gpm normally and 175 gpm/max.

3.1.6 Post Treatment Settlement Tanks – Two 1,000 gallon polypropylene tanks are installed for post DAF settling. One 1,300 gallon steel open topped rectangle low profile tank is installed on the DAF sludge discharge to facilitate sludge dewatering.

3.1.7 Post and Pre-treatment Sand Filtration Systems – Two 500 gallon sand filtration systems are installed in the process train to allow for solids separation. Wastewaters that contain high amounts of suspended solids / sediments will be processed through these units if necessary. One unit contains coarse sand and one a fine sand pre or post treatment if necessary. Normal plant operations do not utilize sand filtration. The sand filters have a backwash system that allows sludge removal to the sludge settling tank.

3.1.8 PLC Main Control Panel, DAF Sub-Control Panel, Tank Leveling Meters, pH and Flow Meters- Plant operations will be controlled by an operator onsite at all times. The process operations are controlled by an Allen-Bradley PLC system that runs all aspect of plant operations. The primary and secondary storage tanks are equipped with tank level sensors that indicate tank levels and volumetric quantification of wastewater stored onsite. Two Endress-Hauser flow meters record both flow into the process system and flow discharge to the POTW. An inline pH probe is installed with a logic loop program to control the chemical dosing system. The DAF operations are controlled by a sub panel with and Eaton PLC that communicates with the Main Control panel PLC. The PLC system is programmed to allow the operator to start and stop the system based on conditions.

3.1.9 Bench Testing Laboratory – UES has installed a Quality Control (QC) testing lab in the plant area for bench testing of influent, process and discharge wastewaters. The lab is equipped with colorimetric meters, titration equipment, oven, burners and glassware to perform qualitative real-time analyses of influent and discharges as well as waste products to assure proper plant operations and to provide confirmation of off-site analytical lab results.

3.1.10 – Containment Systems – The storage tanks are installed on an 86' x 78' containment pad with 42" containment walls. All process equipment is contained inside an adjacent warehouse building. Equipment for transport and treatment of wastewater is housed within containment structures to prevent accidental spillage of wastewater from reaching the environment. Outside containment capacity is approximately 160,000 gallons. The containment system inside the warehouse building is designed to contain 16,400 gallons. An anti-siphon valve is installed inline prior to wastewater entry from the containment pad storage area into the warehouse containment area to prevent errant flow from the storage tanks into the process area.

3.1.11 Water and Air Supply – A 175 cfm 145 psi regulated air compressor was installed to operate the DAF system and supply the pneumatic pumps located throughout the plant. The system has a 300 gallon storage tank and an air dryer to protect critical DAF operation components. Water for cleaning and plant wash down operations is available throughout the plant.

3.2 PRE-TREATMENT SYSTEM PROCESS DESCRIPTION

Design of the plant was based off of batch type operations and that allow for a graduated treatment of the wastewaters processed through the plant. Four treatment types are utilized in normal plant operations: Oily/water separation, Solids Settling, Chemical Dosing and DAF. Additional sand filtration can be utilized in the event of wastewater influents that contain high sediments, solids and turbidity. A schematic flow diagram is attached as **Section 3.4 - Attachment A**.

3.2.1 Pre & Post Sand Filtration - Wastewaters with high turbidity above discharge limits will be pumped through a coarse or fine sand filter prior to treatment. The sand filters systems can be operated in parallel, series or independent of the other. Backwash with process or potable water is required once sand system has been blinded.

3.2.2 Non-emulsified Oily Water and Grease Separation Process - The primary and secondary oily water treatment process is designed to remove non-emulsified oils and greases with primary solids treatment. This process traps floating and non-emulsified oils and grease in a two stage oil water separation system. The non-emulsified oils and grease will separate from the wastewater as it enters the head of the system. The waste oils and grease contained in the primary and secondary oily water separators are pumped off by the operator and stored in the 10K recovery oil tank located in the tank farm. Large sediments and debris are captured in the primary and secondary oily water chambers; this material is removed and placed in the onsite roll-off periodically as needed. The separators utilize hydraulic pressure created by wastewater entering the oily water separators at the top of the tank at 11' above tank bottom grade and hydraulically displace wastewater located at bottom of the first chamber through an opening at 2' above tank bottom grade. Wastewater is then hydraulically displaced from the second chamber through a 12" pipe located 2' above the bottom grade of the tank, the pipe discharges into the top of the tanks settling chamber.

3.2.3 Secondary Solids Settling Process – A secondary settling treatment tank is piped in series so each of the three oily/water separator discharges flow through it prior to entry into DAF treatment. The secondary settlement tank has a 48,600 gallon storage capacity and is divided in half to create 2 settling chambers. Medium to small size grit sand and sediments are removed by gravity as the wastewater flows through the tank.

3.2.4 Chemical Dosing - Chemical dosing treatment is designed to separate emulsified oils and grease from water. A chemical feed pump supplies Sodium Hydroxide to increase the pH of water. Emulsified oil products tend to separate from water at elevated pH levels. The high pH wastewater is treated with a flocculent and coagulant in preparation of entry in the DAF treatment tanks. The flocculent mixes with the sediments, oil and grease and fine particles and the coagulant combines them for ease of removal in the DAF treatment tanks.

3.2.5 Dissolved Air Floatation (DAF) Treatment Process - The Dissolved Air Floatation (DAF) PTEC 175 utilizes compressed air and wastewater to increase the specific gravity of the wastewater allowing the flocculent and coagulant to remove oils and particulates from the water. The waste flocculent is then removed by a skimmer and stored in the 1,000 gallon oil recovery tank. Solids and sludge settled out during the DAF process are removed from the DAF system using a time pneumatic valve that is programmed to open and close as directed by the DAF control panel.

3.3 PRE-TREATMENT PLANT OPERATION DESCRIPTION

The plant consists of offloading systems, storage and primary treatment, storage and settling treatment, chemical dosing treatment, Dissolved Air Floatation treatment, coarse and fine sand filtration if required, post treatment settling, discharge of clean process water, storage and disposal of solids and collection, storage and recycling of waste oil byproducts. The following procedures detail wastewater entry to clean water discharge:

3.3.1 Wastewater Management & Influent – Wastewater produced by onsite and offsite cleaning operations will be properly manifested and documented (UES operations as “Generator Knowledge" / waste profile / or laboratory characterization) prior to entry into the plant. Details of the processes used to create the wastewater will be documented. Some wastewater may require sample submittal for bench test characterization and treatment determination. All waste profiles and manifest copies will be retained for three years on site and retained in off - site storage for an additional two years. All wastewater deliveries will be sampled in advance of discharge for waste profile conformity. The majority of wastewater entering the plant will be offloaded from tanker or vacuum trucks. Some trucks are equipped with offloading pumps and some are not and will require offloading by pneumatic pump. Wastewater enters the system through Influent piping on Tank #1, Tank #2 Tank #3 or Tank #4. Batch processes are most likely to be run when system capacity of approximately 270K gallons has been stored.

3.3.2 Primary Oily Water and Settling Treatment - Wastewater is pumped through the primary, secondary oil/ water separators then through the primary and secondary settlement and into the Flocculator and DAF by the operator. The valves must be set in the proper position. The PLC records the four tank level sensors, influent and effluent flow meters and the dosing pumps to assure that movement of the wastewater is identical to the selections make by the operator prior to startup. Discharge flow rates and influent flow rates as well as tank level calculations are determined by the PLC. The PLC is calculated to assure proper movement of flow from entry into the system to discharge. Prior to plant startup the operator will take a representative sample of the influent wastewater and run scan analyses. Bench testing will be conducted in accordance with lab testing SOP’s provided by manufacturer of equipment. Calibration and testing records will be kept onsite for review.

3.3.3 Chemical Dosing and Flocculation – Sodium hydroxide will be used to increase the pH on the wastewater post pre-treatment. If required the operator can provide the PLC startup with a pH set point. The loop ladder logic will control the pH dosing pump to increase dosing until the desired set point pH level is reached. The loop feedback from the inline pH probe will continue to control caustic dosing. Caustic levels will vary based on reduction and efficiency of the DAF process. “Chem-Treat” will be used as an anionic polymer to provide flocculation of the wastewater stream prior to entry into the DAF unit. Polymer dosing will be calculated based on preliminary bench testing prior to the startup of each batch. Coagulant dosing assists in DAF pre-treatment. Dosing will be determined by bench testing prior to plant discharge. Dosing rates and quantities are entered into the PLC screen by the operator during the plant startup. The plant discharge will be sent to the front of the system to circulate the wastewater while bench testing is being conducted. Recirculation allows for bench testing under real-time process operations. Several sample ports are installed to sequentially bench test wastewater: Prior to placement into the storage tanks; prior to entry into the Flocculator; after the caustic, polymer and coagulant dosing; after a secondary polymer dosing location; after discharge from the DAF and prior to entry in the sanitary sewer system. Bench testing calculations will be documented and scaled up dosing rates applied and tested prior to entry in the sanitary sewer system. A brief description of the flocculator operations is detailed below:

The P-TEC PF Flocculator is a Plug Flow Type Pipe Flocculation Reactor fabricated with stainless steel piping with a stainless steel stand. It includes mixing zones for both coagulation and flocculation required for chemical treatment of most wastewater. The term "plug flow" refers to the fact that retention time and/or mixing energy is constant in any given cross section of the pipe. As such, all particles are subjected to the same amount of mixing energy for the same amount of time. This results in a highly uniform floc with excellent separation characteristics.
A coagulant is usually dosed to the raw water at the inlet of the flocculator. Immediately after the dosing point, a static mixer is installed for the mixing of the coagulant and the raw water. The reaction is completed in the pipe following the mixer. Mixing energy and reaction energy, in the mixers and the pipe are a result of turbulence (Reynolds number). Coagulation is the destabilization (by electrical charge neutralization) of the influent pollution particles into *microfloc* particles. When coagulation is completed, a flocculent is dosed just ahead of a second static mixer. Flocculation is performed by collecting and trapping these microfloc particles into larger M*acrofloc* particles by the use of long-chained synthetic polymers. These polymers usually have either a negative (anionic) or positive (cationic) charge. Mixing of the water and the flocculants takes place in a second static mixer. Floc growth is completed in the pipe, following the mixer.
The PF Flocculator allows for the addition of a portion of the DAF recycle flow containing dissolved air “whitewater” just after the flocculant. This enhances the floc’s buoyancy by incorporating micro-bubbles *inside the floc’s as they are forming*, which makes separation inside the DAF more efficient.

3.3.4 DAF Operation – Flocced wastewater enters the DAF and is blended and recirculated through an air blending pump. The blending pump produces microscopic bubbles that increase surface area contact with the flocced wastes and float the larger flocced particles to the surface. The cleaned wastewater is discharge through a weir, the flocced waste products are skimmed off of the top using a motorized skimmer. Skimmer speed and operation is dictated by quantity and type of flocced materials that are present. The operator is required to adjust as necessary.

The heavier materials are separated and sink to the bottom of the DAF. These heavy materials are discharged by a timed pneumatic valve. Sludge, grit, sand and wastewater are discharged into a 1,300 gallon tank and allowed to settle as necessary. Sludge is discharged to the roll-off for characterization and disposal, remaining wastewater is pumped to the front of the oil water separator for reprocessing.

A brief technical description of the DAF PTEC 175 operation is included below:

The HS MacroDAF is a "High Solids" Dissolved Air Flotation (DAF) system that utilizes a large free surface area for flotation in high solids loading applications. The system features all stainless steel construction and is equipped with two high pressure recirculation (air dissolving) pumps; one pump operating and one pump as a 100% stand-by. System operation can be either manual or automatic using a PLC-based control panel that integrates with other installed equipment, (feed pumps, chemical feed systems, etc.). The raw water enters the unit through an inlet distribution box that spreads the flow of water across the width of the unit while decreasing its velocity. Once inside the unit heavy sand or grit particles settle into an inverted pyramid type cone where they are manually or automatically discharged through a settled solids drain. In automatic operation, timers in the PLC periodically open a pneumatically operated valve. Whitewater from the recirculation system is dosed at the inlet of the unit to provide micro-bubbles that attach to the floc's giving them buoyancy to float them to the surface to form a floating layer. The floc is collected in the floating layer (sludge), a unique grid system is installed on the surface that aids in dewatering/thickening the sludge. The sludge is removed with a full-length skimmer system. Sludge removal by the dewatering/skimmer system can be adjusted by water level. Adjustable outlet weirs are provided to set the level in the flotation unit in the optimum position. Treated water leaves the DAF via an effluent channel and overflow weirs. Part of the treated water is recycled through a specially designed pump to produce whitewater (micro-bubbles). Air is dosed in the aeration pump(s). Air flow meters are installed in the air supply control panel to adjust the volume of air metered into the recirculation pump(s). The pump(s) pressurizes the air/water mixture to 95 -110 psi in order to dissolve air into the recycle water (Henry's Law). Further dissolving of the air (as well as separation of any excess, undissolved air) takes place in the aeration header. From the aeration header, the whitewater is dosed to various points of the unit. Depressurization takes place in aeration ball valves, forcing the dissolved air to come out of solution to form micro-bubbles. Micro-bubbles attach to equally sized or larger particles. If a flocculator is installed before the flotation unit, part of the whitewater may be dosed into the flocculator to trap micro-bubbles inside the flocs *as they are forming*. These trapped micro-bubbles will stabilize the floc and keep it buoyant as it remains in the floating layer.

3.3.5 Final Discharge Settling Tank – The treated clean water is allowed to settle in a 1,000 gallon poly tank after being discharged from the DAF. The water is gravity feed into the top of the tank and fills until a high float turns the discharge pump on, if the low float is activated the pump stops until the high level float is activated.

3.3.6 Alarms and Plant Operation – The Pre-treatment system is equipped with several alarms to prevent spills and control discharge to sanitary sewer. The alarm on the plant stops all plant operation, closes all plant functions and indicates an audio and visual alarm that will require operator activity to restart. The alarms are as follows:

High Storage Tank Level – If the primary and secondary storage tanks are filled to 1' below overflow, the system and the alarm will indicate.

Flow Disparity – If the flow volume coming into the plant and leaving the plant are not within 2-3 % of each other the alarm will activate. If the volume of water calculated leaving the storage tanks is not within 2% of the volume calculated leaving the plant the alarm will indicate.

Dosing Pump Error – If the dosing pumps cannot supply required rate, or required pH level or the backpressure is too high, the alarm will indicate.

DAF Dry – If the DAF tank does not have enough flow, the alarm will indicate.

Overflow in Containment Area – One inch of liquid in the containment area will set off the alarm.

3.3.7 Containment Structure Stormwater Management - Rainwater collected on the storage tank containment pad is collected by drainage runs that are installed and graded to a sump located in the southeast corner of the pad. The rainwater is collected and pumped to the front of the pre-treatment system for treatment with all of the other plant wastewater. Plant operations require a startup procedure entered by the plant operator. The startup procedure requires the operator to check and position all valves, dosing rates, pump operations and calibrations prior to discharge.

3.4 Petroleum Contact Water PCW Management Acceptance Procedure Description

Prior to entry into the plant liquids impacted with petroleum or Petroleum Contact Water (PCW) wastes are verified by use of procedures outline in FAC 62-740. UES is not a producer of PCW. PCW acceptance procedures are similar to those utilized for used oil acceptance procedures outlined in Attachment 6 of this submittal. The following sections discuss the transportation, acceptance, treatment, and shipment of recovered oils from PCW treatment.

3.4.1 PCW Waste Acceptance Procedure - Transportation of PCW to the UES facility is typically conducted by non UES transporters. All PCW defined wastes are required to have associated documentation before the transport vehicle is allowed to offload into the PCW treatment system tanks. Prior to PCW acceptance into the treatment facility the plant operator records the PCW transporter shipment documentation into a PCW Acceptance Record and photocopies a copy for entry into a 3 ring binder maintained in the laboratory. The PCW Acceptance Record is attached as 3.4.1.5. A minimum of the following information must be recorded before offloading of PCW into the treatment facility can occur:

1. Name and address of the PCW producer.
2. Name and address of the PCW transporter.
3. Date of receipt of the PCW shipment.
4. Volume of the PCW received.
5. Tank ID where PCW was offloaded.
6. A copy of the shipping paper or manifest used for shipment of the PCW.

The records are retained in a 3 ring binder maintained in the plant laboratory.
The plant operator will annually develop a submission that details the quantity of PCW received and the quantity of recovered product.
After acceptance of PCW delivery documentation, the UES plant operator will verify contents of the transport vehicle by use of the following procedures:

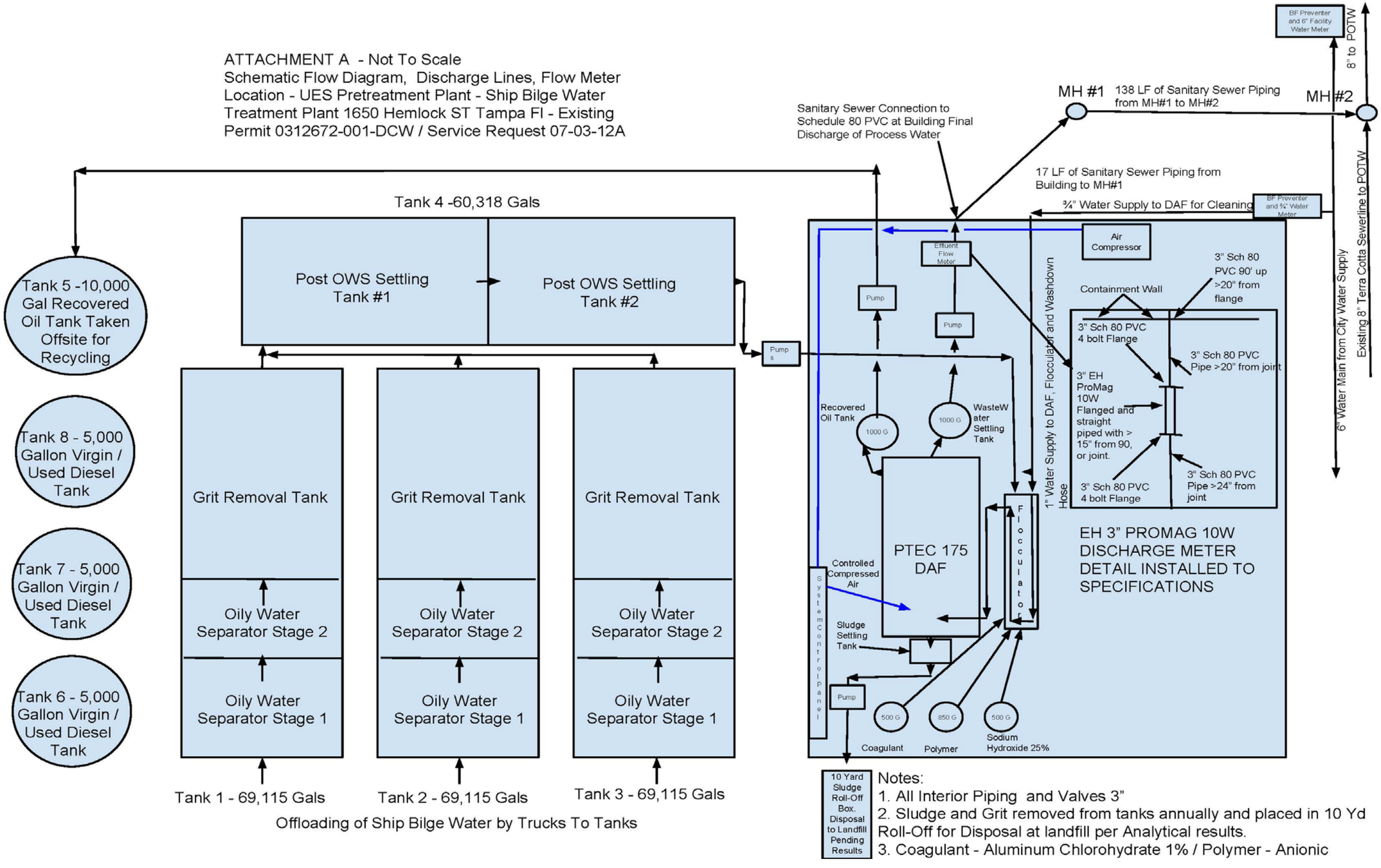
1. Take a sample of the PCW using a Coliwasa or dip tube and a glass container.
2. The sample is taken to the onsite laboratory and visually observed under light. If wastes appear to be hazardous or the operator believes the waste not be to PCW the load is rejected until proper documentation is provided to determine that waste id PCW.
3. The operator will take pH and conductivity readings of the PCW waste liquids as well as conduct a flammability test. The pH must be greater than 4 and less than 10 and the flammability must fail. These readings are documented in the PCW Acceptance Logbook.

After both PCW waste documentation acceptance and completion of the modified second knowledge test is conducted will the PCW waste will be offloaded into the PCW recovery tanks located onsite.

3.4.2 PCW Treatment Procedure - PCW wastes are collected and batched in the Tank #6, Tank #7 and Tank #8 depending on plant operations and storage capacities available. PCW are allowed time to settle. Water is decanted is decanted periodically from the bottom of the fuel storage tanks into totes positioned inside of the tank containment area. When the plant plant personnel observes the interface of the fuel and water the procedure is stopped by closing the valve. Decanted water is then pumped into the treatment tanks (tank #1, #2 or #3) for processing through the plant.The plant operator records the volume of water in the onsite logbook. Recovered fuel is loaded and shipped off site when sufficient quantity (tanker) is collected. The fuels are taken to a recycle center by Raider Environmental. The PCW is then pumped into the DAF system for oil separation. The oil is skimmed off of the DAF system, recover oils are skimmed into the oil recovery tank and pumped out to the 10,000 gallon recovered oil tank located on the tank containment pad area. Water sent through the processing plant and into the DAF system for final oils removal and polishing. Wastewater is discharged from the DAF into the DAF settling tank and disposed by entry into the POTW sanitary sewer system. Oil water separator and grit removal operation are detailed in **Section 3.3.2** of this attachment. DAF operation is detailed in **Section 3.3.4**. The POTW wastewater permit and industrial wastewater permit classification are detailed in **Attachment 4** of this submission.

3.4.3 Reclaimed Oil Storage and Removal – Recovered oils from the separation process are stored in the 10,000 gallon recovered oil storage tank located on the tank containment pad. The recovered oil tank is emptied when the tank capacity exceeds 75% or quarterly. Raider Environmental is contracted to remove, transport and process the recovered oil. Recovered oil is profiled and manifested and a copy of the disposal manifest is retained in a 3 ring binder located in the laboratory.

3.4 Attachment A - Section 3 Process Flow Diagram



ATTACHMENT 4 - WASTE ANALYSES AND SAMPLING PLAN

4.0 WASTE ANALYSES and SAMPLING PLAN (WASP)

This document is a Waste Analysis and Sampling Plan (WASP) prepared for use by Universal Environmental Solutions, Inc. (UES) located at 1650 Hemlock Ave in Tampa, Florida. UES conducts services associated with the treatment and recycling of petroleum contact water (PCW) and emulsified oils in waters created by ship cleaning and offsite deliveries. UES is not a small or large quantity hazardous waste generator or transporter.

The WASP is required for a large or small hazardous waste generator who treats hazardous waste to meet applicable Land Disposal Restrictions (LDR), a permitted hazardous waste treatment, storage, or disposal (TSD) facility, or a used oil processor and used oil marketer.

This WASP is required because UES is a used oil processor. The WASP will also be used if UES treats a hazardous waste to meet applicable Florida Department of Environmental Protection (FDEP) requirements. UES is not a permitted to accept or process hazardous listed waste. The WASP will also be used as a guide to document waste analysis procedures that are used for the receipt of non-hazardous waste and materials that are brought into the UES facility. The purpose of this Waste Analysis Plan (WASP) is to also document the required sampling and analytical methods as well as the quality control/quality assurance (QA/QC) procedures that are used to ensure that used oil accepted from UES customers meets allowable limits. This WASP will also be used to ensure that specification for used oils recycled by UES meets required specifications as per applicable State and Federal requirements.

This WASP has been divided into four sections. *Section One* is a description of Facility and Process procedures. *Section Two* contains Sampling Procedures; *Section Three* contains information on the various analytical tests that are used for rendering waste determinations, total halogen tests for used oil, and testing for used oil fuel product specifications. *Section Four* of this WASP pertains to UES acceptance, handling, processing and testing of used oil as a transporter, processor, and recycler of used oils and rebuttable procedures.

4.1 GENERAL FACILITY DESCRIPTION AND PROCESS INFORMATION

Historically, shipyard cleaning and decontamination operations have been costly and performed by outside service providers. UES is an affiliate operation of two large shipyards: Gulf Marine Repair and the Hendry Corporation. The UES facility is located at the Port Hendry Terminal. UES has been developed to expand onsite operations of these respective shipyards. This operation is an effort to reduce costs by internalizing this important shipyard function. Critical to this strategy is the pre-treatment facility to streamline cleaning and decontamination processes and the large volumes of wastewater generated. UES contracted two Tampa based engineering businesses that have extensive experience in wastewater design, engineering and construction, SCS Engineers and Seavy & Associates, Inc., to assist them in the design, construction and operations of the Bilge & Oily Water Pre-treatment Plant (plant). As detailed in the initial evaluation of the service request submittal; UES intends to operate this plant on a continual basis with discharge to the POTW occurring when processing operations are complete. The plant design methodology included implementation of alarm and safety

systems to eliminate or reduce risks in the loading, transport, offloading, storage, and disposal wastewater created by cleaning and decontamination activities.

4.1.1 UES Material Acceptance Requirements - UES has established procedures for the acceptance and handling of materials that are brought into the facility. Many of these procedures have been developed by best management and regulatory permitted practices. UES accepts materials through a contract or purchase order. Only pre-approved shipments are received at the facility. UES customers are required to submit waste determination documentation (UES Waste Profile) that may be based upon generator process knowledge, material data safety sheets, and/or analytical testing. UES reviews this information as part of its acceptance procedures. This process helps to ensure that only approved materials are accepted at the UES facility. This process also helps UES address questions as to whether or not the waste or material that is accepted is regulated or exempt, is a listed or characteristic waste, is a special waste, or a material that will not be accepted. Waste determinations for residuals and waste produced by UES as part of its facility operations are based upon a generator's process knowledge, material safety data sheets, or analytical testing. UES annually renews waste profiles with solid waste facilities that accept UES solid waste. This includes requirements for analytical testing. Analytical testing is also performed to ensure that on-specification discharges from the facility to the local POTW are compliant with local wastewater regulations.

4.1.2 Record Keeping - Used oil and waste or materials that are accepted at the UES facility require the customer to prepare and/or sign a bill of lading or nonhazardous waste manifest. UES maintains required tracking information and documentation that is required for a used oil transporter and used oil processor. Reports are filed with the FEDP as per the applicable regulations. Copies of the representative forms are provided as an attachment to this WASP. The FDEP requires the completion of annual forms. UES maintains its documentation for a minimum of three years as per applicable regulations on record keeping.

4.2 SAMPLING PROCEDURES

4.2.1 Representative Samples -When UES collects samples for analytical testing, samples are collected in accordance with FDEP approved methods, and a protocol to assure that a representative sample is collected. The samples are sent to an FDEP approved and licensed laboratory, under a chain of custody. Samples are analyzed in accordance with *written procedures outlined in FDEP and "Test Methods for Evaluating Solid Waste, Physical/Chemical Methods," U.S. Environmental Protection Agency (EPA) Publication No. SW-846, Third Edition, Chapter 1 (November 1986), and its updates.*

Each parameter and its applicable analytical method are provided in the certified laboratory's Quality Assurance and Quality Control (QA/QC) Plan. All sampling procedures are designed and performed in a manner to ensure that samples are representative of the bulk material from which they are taken.

Based upon sample design, sample approaches may vary based upon the sample purpose, type of material to be sampled and the type of container. Sample approaches may include composite samples for large tanks, discrete grab samples, unbiased random sampling, biased or authoritative samples based upon knowledge of the materials to be sampled. Sampling strategies are also based upon the materials to be collected and the purpose of the analysis. Random sample patterns may include simple, stratified or systematic, dependent upon sampling objectives.

4.2.2 Representative Sampling Procedures:

- Prior to conducting sampling, personnel are required to wear the proper level of personnel protective equipment. This may include gloves, safety glasses, (with face shields) and respirators as required.

- Safety equipment is also required for assessing tanker truck and tanks, including required fall protection.

- Prior to sampling trucks, the pressure or vacuum must be relieved from the vessel by the driver. Upon confirmation, the hatch levers will be slowly released until the hatch can be safely opened. The coliwasa or bailer will be lowered into the tank to obtain a representative sample.

- Samples collected from tanks will involve the collection of a representative sample from the sample ports on top or at the base of the tank or hose, taking to account the heterogeneous layering in the tank that may include solids, water, and oil. Samples may be collected in clean and approved buckets, bottles or sample containers, bailer, large tank coliwasa, or similar sampling device.

- Samples collected from containers or carboys will involve the collection of representative samples. Dependent upon the consistency and state of the material, samples may be collected using a clean coliwasa, drum thief, bailer or dipper, based upon the substance to be sampled and the configuration of the container (open head, closed head, or screw top, etc.).

- Samples collected from bins, roll-off boxes or totes will be representative samples that may include scoops or core samples based upon depth, access, stratification of the material in the bin.

- Samples that are collected are to be labeled and maintained under a chain of custody.

Clean sample containers that are used are provided by the licensed analytical lab. The size, type, and any preservatives in the container are based upon the analytical test that is being requested and are provided by the lab. Sample quality control is maintained and may include temperature blanks for samples that must be kept at a certain temperature. Other quality control may include trip blanks and equipment blanks as required based upon the type of sampling and applicable requirements. UES takes split samples and duplicate samples periodically based upon the circumstance as determined by QA/QC need, the request of a customer or regulatory agency. Sample VOAs may also be used for the collection of liquid samples that require zero headspace. Compliance samples are analyzed at a licensed / accredited lab (Pace). Analytes tested are based upon purpose and requirements for waste determinations, waste profiling and screening as required by regulatory requirements, product quality control and assurance, or as required by offsite disposal facilities or UES customers.

4.3 ANALYTICAL TESTING

4.3.1 Analytical Tests - Analytical testing is completed for a variety of purposes. This may include waste determinations, waste profiles, constituent screening, and quality control. Waste is required to be profiled and applicable LDR certifications are required. These are updated annual. UES may render waste determinations and deny acceptance or disposal based upon analytical testing or generator knowledge. Analytical testing may be required for characteristic hazardous waste. Waste determinations can also be rendered by the generator based upon generator process knowledge which may include material safety data sheets. UES currently utilizes Pace for screening and compliance analytical testing. UES also completes analytical testing as part of the process used to send non-RCRA regulated solid waste to approved disposal facilities. Solid waste facility approvals typically require the

completion of a waste profile. On an annual basis, analytical testing is also typically required. UES follows the waste acceptance procedures that are required by the solid waste facility. Waste that is sent to solid waste landfills may include non-hazardous waste derived from the UES facility or waste that is derived through UES customers. UES also conducts analytical testing for meetings its obligations as a used oil transporter, processor, and marketer. In addition to compliance testing completed by Pace, UES uses field testing for finger print analysis and screening onsite. Raider Environmental (Mulberry) or January Environmental (Bartow) recycles the waste recovered oils created by the separation process.

Table 4.3-1 of the following page provides a general listing of the analytical tests used by UES for various purposes under this WASP. The information includes parameters, analytes, when the test is used, notes and frequency of testing.

Table 4.3-1: Analytical Testing:

Parameter	Test Method	Constituents	When Used	Notes	Frequency
TCLP Extraction	SW 1311	TCLP Extraction	When documenting hazardous waste TCLP hazardous waste characteristics	1311 extraction may not be required if sample is 100% liquid with less than 0.5% suspended solids.	As needed for hazardous waste determinations
ICP Metals RCRA (7)	SW 6010B	Cadmium, chromium, arsenic, lead, silver, selenium, barium	Testing for RCRA 7 Metals, use extraction 1311 to document TCLP characteristics. Arsenic, lead, cadmium chromium also analyzed for on-spec oil testing	Method 6010B is used for solid samples including soil, sludge, sediments or concentrated liquids.	As needed for hazardous waste determination, every 20,000 gallon tank for fuel specification
Mercury	SW 7470A	Mercury Aqueous Sample	Testing Mercury, use extraction 1311 to document TCLP characteristics	Use 7471A for Mercury Solid Sample	As needed for hazardous waste determination
ICP Metals (All)	SW 6010B	31 metal constituents	Metals screen, more than RCRA Metals, may be used to help document LDR underlying Constituents	Specify metals, reference all, target metals or RCRA metals.	As needed for screen, underlying constituents or solid waste profiling
RCRA Volatiles	SW 8260B (14 RCRA Constituents)	14 RCRA volatile organic constituents	Used with TCLP 1311 to document RCRA VOC constituents. Use for solid samples including soil, sludge, sediment, or concentrated liquids	1311 extraction may not be required if sample is 100% liquid with less than 0.5% suspended solids.	As needed for hazardous waste determination, solid waste profiling, used

Parameter	Test Method	Constituents	When Used	Notes	Frequency
RCRA Semi-Volatiles	SW 8270C (18 RCRA Constituents)	18 RCRA semi-volatile organic constituents	Used with 1311 to document RCRA semi-volatile organic constituents. Use for solid samples including soil, sludge, sediment, or concentrated liquids	1311 extraction may not be required if sample is 100% liquid with less than 0.5% suspended solids.	As needed for hazardous waste determination or solid waste profiling
Volatiles	SW 8260B	62 Volatile Constituents	Can be used as a screen or for target analytes. May also be used to help identify underlying hazardous waste constituents.	Use for solid samples including soil, sludge, sediment, or Concentrated liquids	As needed for screen or solid waste profiling
Semi-Volatiles	SW 8270C	65 Semi-Volatile Constituents in Test	Can be used as a screen or for target analytes. May also be used to help identify underlying hazardous waste constituents. Test also includes PAHs for testing excavated and regulated PCS contaminated soil.	Use for solid samples including soil, sludge, sediment, or concentrated liquids. Regulated PCS requires special approval to transport or handle and special manifest	As needed for screen or solid waste or special waste profiling
PAHs	SW 8310	16 Polynuclear Aromatic Hydrocarbons	Petroleum Contaminated Soil screening for PAHs. SRC does not transport or handle regulated PCS waste.	Used to determine if excavated PCS is regulated based upon State regulatory limit.	As needed for screen or solid waste or special waste profiling.

Parameter	Test Method	Constituents	When Used	Notes	Frequency
Total Halogens	SW 9077	Total chlorides in new and used oil	Used as screen for total halogens (above or below 1,000 ppm)	Field Test Dexsill Chlor-D-Tect 1000	Used oil pickups and deliveries
Total Halides	SW 9020	Total Halides in new and used oil	Used as screen for total halogens (above or below 1,000 ppm)	Field Test Dexsill Chlor-D-Tect 1000	Used oil pickups and deliveries
Oil Sulfur	ASTM D4294	Sulfur in Oil	Specification oil product quality	X-Ray Fluorescence Spectroscopy	Every 20,000 gallon tank
PCBs	SW 8082	7 types of aroclor compounds	Screening for PCB required for certain customers. Test also used for on specification fuel oil quality control	Method 8082 used to determine Concentrations in PCBs as aroclors or individual PCB ongeners in extracts from solid and aqueous matrices	As needed for used oil from California, electrical transformers and every 20,000 gallon tank
Corrosivity (Aqueous)	SW 9040C	pH	Aqueous samples (has measurable pH, must contain at least 20% free water by volume	Hold times are limited requires immediate analysis or flag noted	As needed for hazardous waste determinations or profiling
Corrosivity (Liquid)	SW 1110A	pH	Non-aqueous liquid sample. Many aqueous samples are liquids so may need to run both tests if hydrogen ions do not disassociate on 9040C	Test is based upon steel corrosion rates (see RO 13561 or Test Method)	As needed for hazardous waste determinations or profiling
Free Liquids	SW 9095B	Free Liquids Paint Filter Test	Used for determining if a waste is a liquid if required	Liquid for flashpoint or pH tests, may also use pressure test in 1311 if needed.	As needed for hazardous waste determinations or solid waste profiling

4.4 UES USED OIL ACCEPTANCE PROCEDURES TO MEET THE REBUTTABLE PRESUMPTION REQUIREMENTS

For used oil shipments, customers are required to enter into an agreement and provide information on their regulatory status and used oil handling practices as required. The UES plant operator conducts an EPA approved test for total halogens on used oil prior to delivery and acceptance of the used oil shipment. Customers are required to sign a bill of lading or non-hazardous waste manifest, dependent upon the shipment and the results of the testing. UES utilizes a contract for its used oil burner customers. For other customers, UES utilizes a purchase order agreement. Prior to accepting used oils or petroleum contact water from its customers, UES enters into an agreement and obtains information on the type of oil. If the source of oil is from a transformer, UES also requires PCB analytical testing, total halogen, flash point, and BTU analysis of the used oil as described in this WASP. Prior to UES picking up oil, UES transport drivers conduct testing of the oil to confirm the halogen content of the used oil. This test is performed using a "TIF XP – 1A Automatic Halogen Leak Detector" A "Dexsil Chlor-D-Tect 1000 ® test kit. The results of the test are marked on the shipping papers. If the total halogen content meets or exceeds 1,000 ppm total halogens, then UES will require the used oil generator to prepare a rebuttable presumption certifying that the used oil was not mixed with a listed hazardous waste. UES provides the customer with a certification form and instructions. In order to rebut the presumption that the used oil is not mixed with a hazardous waste, the customer is advised to have a sample of the used oil analyzed by a certified analytical lab and make the determination based upon the analytical results. The recommended analytical test is SW 8260B. The used oil customer may also rebut the presumption under certain circumstances if the oils contain chlorinated paraffin's or applying other knowledge of the halogen content of the used oil in light of the materials or processed used.

A used oil generator who is unable to rebut the presumption will need to ship the used oil as a hazardous waste to a designated facility for disposal. If the used oil generator rebuts the presumption based upon chlorinated paraffin's, analytical testing, or generator knowledge, UES will require documentation. UES also requires the following certification:

I certify that the used oil in this shipment has not been mixed with a listed hazardous waste, based upon my understanding of the hazardous waste and used oil regulations. I have based my determination upon the following information that is attached to this certification statement as required: __analytical testing, __material safety data sheet, __generator knowledge.

The used oil customer signs the form and based upon the information, UES either accepts the load, rejects the load or retests the load. Used oil shipments, that may be delivered by other used oil transporters requires similar information in terms of documentation. UES also tests the incoming used oil shipments to its facility and maintains the required documentation in accordance with applicable regulations. UES maintains a similar process for documenting acceptance as a used oil processor. UES maintains used oil records as a transporter and processor. Annual reports are also submitted to the FDEP on forms that are provided (see attachment).

UES does accept off specification used oil for processing and blending to make it on-specification used oil fuel. Other analytical tests as described in this WASP (Table 1) are used for screening, testing and to confirm that on specification used oil standards are met prior to product distribution.

The requirements and parameters for on specification fuel are provided in Table 4.4-1. Regulatory and WASP notes associated with this table are also provided. Sampling procedures for testing were described in *Section Four-Two* of this WASP. Sample collection procedures are consistent with Appendix-1 of 40 CFR Part 261 and other Florida applicable requirements.

TABLE 4.4-1:

On Specification Used Oil Fuel Parameters*

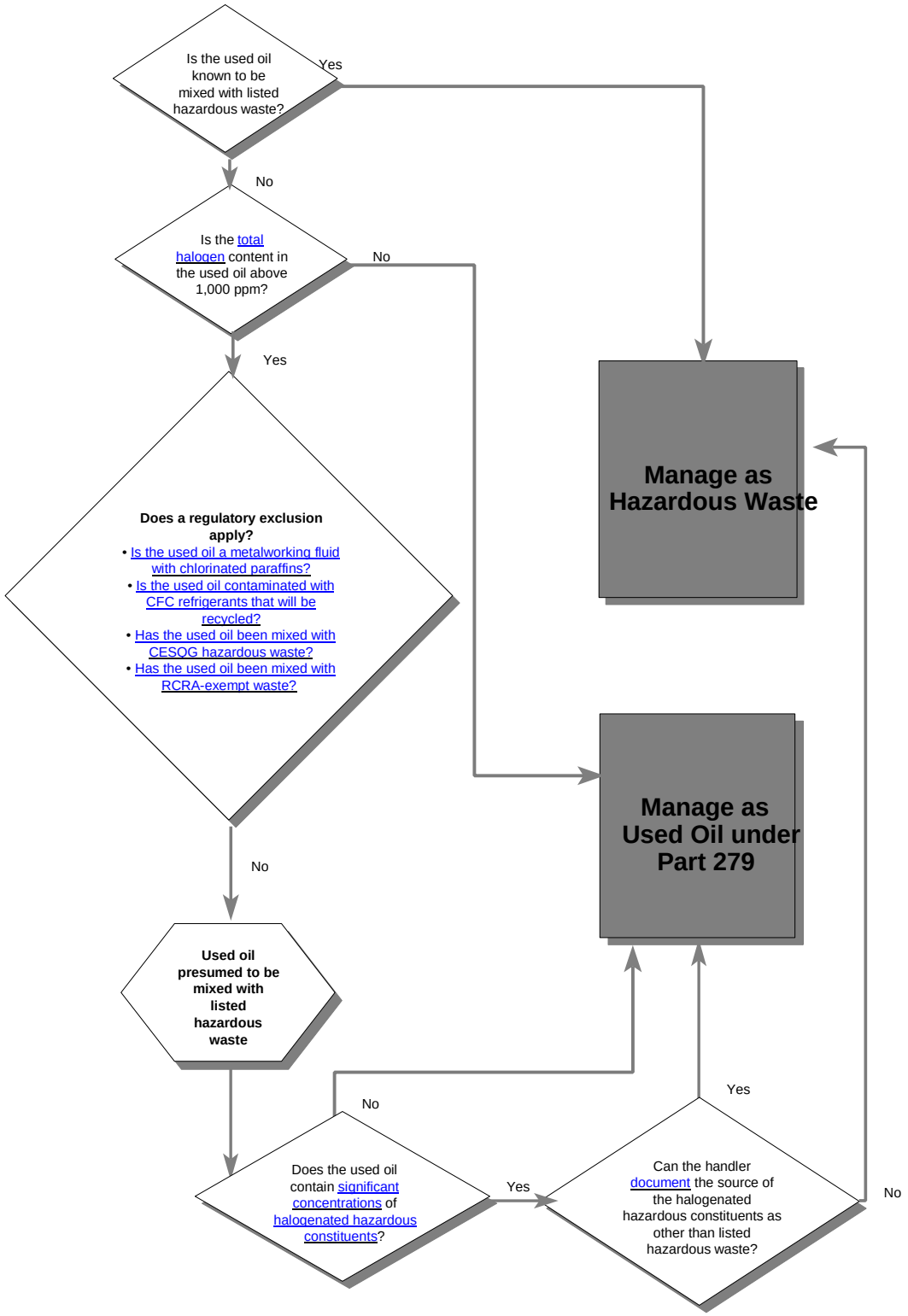
Constituent or Property Allowable Level Test Method SW-846

Arsenic 5 ppm maximum (EPA 6010B)	Cadmium 2 ppm maximum (EPA 6010B)
Chromium 10 ppm maximum (EPA 6010B)	Lead 100 ppm maximum (EPA 6010B)
Flash Point 100 F minimum (EPA 1010A)	Total Halogens 1,000 ppm maximum (EPA 9075)
PCBs Less than 2 ppm (EPA 8082)	

Note: Applicable standards for the burning of used oil containing PCBs are imposed by 40 CFR 761.20(e). (UES WASP Note- Used oil containing less than 50 ppm PCBs is regulated under the used oil regulations; however, TSCA requirements will also apply for the burning of the oil. If the PCB concentration is 2 ppm or greater, TSCA limits the marketing of the used oil to a TSCA qualified incinerator or other marketers who market off specification used oil for energy recovery. The term qualified incinerator means a PCB incinerator, a high efficiency TSCA approved boiler, a RCRA incinerator, or an off spec used oil industrial boiler or furnace provided certain conditions are met. PCBs at concentrations of 50 ppm or greater are regulated by TSCA. There are also PCB dilution prohibitions. UES does not accept PCB contaminated used oil.)

The allowable levels do not apply to mixtures of used oil and hazardous waste that continue to be regulated as hazardous waste (see §279.10(b)). Used oil containing more than 1,000 ppm total halogens is presumed to be a hazardous waste under the rebuttable presumption provided under §279.10(b)(1). Such used oil is subject to subpart H of part 266 of the RCRA regulations rather than the used oil regulations when burned for energy recovery unless the presumption of mixing can be successfully rebutted. (UES WASP Note: Even if the presumption of mixing has been successful, concentrations of total halogens in used oil greater than the 1,000 ppm are off specification). Metal values are based upon total metals and not TCLP values.

TABLE 4.4-2: REBUTTABLE PRESUMPTIVE ANALYSIS FLOW CHART



4.4.2 Requirements §279.55 Analysis Plan - Owners or operators of used oil processing and re-refining facilities must develop and follow a written analysis plan describing the procedures that will be used to comply with the analysis requirements of §279.53 and, if applicable, §279.72.

The owner or operator must keep the plan at the facility.

(A) *Rebuttable presumption for used oil in §279.53.* At a minimum, the plan must specify the following:

(1) Whether sample analyses or knowledge of the halogen content of the used oil will be used to make this determination.

(2) If sample analyses are used to make this determination:

(i) The sampling method used to obtain representative samples to be analyzed. Representative samples may be obtained using either:

(A) One of the sampling methods in appendix I of part 261 of this chapter; or

(B) A method shown to be equivalent under §§260.20 and 260.21 of this chapter;

(ii) The frequency of sampling to be performed, and whether the analysis will be

performed on-site or off-site; and

(iii) The methods used to analyze used oil for the parameters specified in §279.53; and

(3) The type of information that will be used to determine the halogen content of

the used oil.

(b) *On-specification used oil fuel in §279.72.* At a minimum, the plan must specify

the following if §279.72 are applicable:

(1) Whether sample analyses or other information will be used to make this determination;

(2) If sample analyses are used to make this determination:

(i) The sampling method used to obtain representative samples to be analyzed. A representative sample may be obtained using either:

A) One of the sampling methods in appendix I of part 261

of this chapter; or

(B) A method shown to be equivalent under §§260.20 and 260.21 of this chapter;

(ii) Whether used oil will be sampled and analyzed prior to or after any

processing/re-refining;

(iii) The frequency of sampling to be performed, and whether the analysis will be performed on-site or off-site; and

(iv) The methods used to analyze used oil for the parameters specified in §279.72; and

(3) The type of information that will be used to make the on specification used oil fuel determination.

4.4.3 UES Compliance with §279.55 and 62-710, FAC Analysis Plan Requirements - This WASP represents UES efforts to document and describe its procedures as a used oil processer/re-refiner. UES follows this WASP to comply with the analysis requirements of §279.53 pertaining to the rebuttable presumption for used oil and §279.72 which pertains to used oil marketer requirements for on specification used oil fuel. UES maintains this WASP at its facility in Tampa FL. The UES WASP specifies for the rebuttable presumption for used oil (in §279.53) and 62-710, FAC that UES analyzes the halogen content of used oil to make this determination.

Used oil is tested using approved analytical methods when the used oil is picked up when UES is a transporter. Based upon the test results, that are described in *Section One* to *Section Three* of this WASP, the used oil is either accepted or rejected prior to being transported or accepted at the UES facility. Incoming trucks where UES is not the transporter are also tested for total halogens and total halogen tests are conducted through an offsite ADHS certified lab after each 20,000 gallon tank of on specification used oil is processed and before it is marketed for distribution.

Sampling methods used to collect and analyze representative samples are described in *Sections Two and Section Three* of this WASP and are in conformance with Appendix I of part 261 of the RCRA regulations or an equivalent method under §§260.20 and 260.21 of the RCRA regulations. This WASP also describes the frequency of sampling to be performed, and whether the analysis will be performed on-site or off-site; and the methods used to analyze used oil for the parameters specified in §279.53 (*Tables 4.3.1* of this WASP). The information provided in this WASP describes the information that will be used to determine the halogen content of the used oil.

This WASP also specifies the sampling procedures and the analytical testing that will be used to document on specification fuel oil that is processed and marketed through UES*. Tables 4.3.1* provide this information. Sampling methods provide for the collection of a representative sample. Representative sampling methods are in conformance with appendix I of part 261 of the RCRA regulations or an equivalent method under §§260.20 and 260.21 of the RCRA regulations. This WASP also describes the frequency of sampling to be performed, and whether the analysis will be performed on-site or off-site; and the methods used to analyze used oil for the parameters specified in §279.72. This analytical data provides information to make the on specification used oil fuel determination. Oil is sampled upon receipt (prior to processing) and after processing but before used oil fuel distribution. Records and tracking documents are maintained as per the referenced regulations.

4.5 Facility Industrial Wastewater Permit

The UES Oily Bilge Water Treatment plant facility was granted an Industrial Wastewater discharge permit #1112 by the City of Tampa Industrial Wastewater Department. The wastewater permit was submitted under 40 CFR Part 437 - Subpart D Centralized Waste Treatment Point Source Category - Multiple Waste streams. The permit allows discharge of fully retreated wastewater to the Curran treatment plant. The permit details the discharge requirements, wastewater discharge limits, sampling frequency, and maximum flow rates and quality controls requirements.

The UES plant operator is responsible for conditions detailed in the permit including confirmation sample collection, documentation and recording.

4.5.1 Approved City of Tampa Wastewater Department Industrial Wastewater Permit #1112

CITY OF TAMPA

Bob Buckhorn, Mayor

Wastewater Department

Anthony L. Kasper, P.E.
Director

Mr. Ed Kinley
Universal Environmental Solutions, LLC
P.O. Box 76105
Tampa, FL 33675

March 4, 2014

Re: Issuance of an Industrial Wastewater Discharge Permit to Universal Environmental Solutions, LLC, by the City of Tampa, Wastewater Department.

Dear Mr. Kinley:

The enclosed issued permit, No. 1112, governs the wastewater discharge from the facility located at 1650 Hemlock St., Tampa, Florida 33605, into the City of Tampa's wastewater collection system. All discharges from this facility and actions and reports relating thereto shall be in accordance with the terms and conditions of this permit.

There are two copies of the "Acceptance of Permit" page at the end of the discharge permit with a block reserved for your signature indicating acceptance of the limitations and conditions specified in the permit. Please sign both copies of the page, retain one copy with the permit, and return one of the signed copies to Mr. John Daily, City of Tampa, Industrial Waste Section, 2700 Maritime Blvd., Tampa, FL 33605.

If you have any questions about this permit please do not hesitate to contact Mr. Daily at (813) 247-3451, ext. 55222.

Sincerely,

Anthony L. Kasper, P.E.
Director
Wastewater Department

ALK:jmd

2700Maritime Boulevard • Tampa, Florida 33605 • (813) 247-3451 • FAX: (813) 248-5269

TampaGov
www.tampagov.net

CITY OF TAMPA

WASTEWATER DEPARTMENT

INDUSTRIAL WASTEWATER DISCHARGE PERMIT

City of Tampa
Wastewater Department
Industrial Wastewater Discharge Permit

Cover Page

Permit No. 1112

In accordance with the provisions of Section 26-122 of the City of Tampa Code:

Company Name Universal Environmental Solutions, LLC

Address 1650 Hemlock St.

Tampa, FL 33605

Telephone Number (813) 390-0659

Name of Applicant Ed Kinley

Is Universal Environmental Solutions, LLC, a Florida Profit Corporation, with principal place of business located at 1650 Hemlock St., Tampa, Florida 33605, herein referred to as "permittee," is hereby authorized to discharge industrial wastewater from the above identified facility and through the outfalls identified herein, and hereinafter referred to as "facility," into the City of Tampa sewer system in accordance with the conditions set forth in this Industrial Wastewater Discharge Permit, hereinafter referred to as the "permit." Issuance of this permit shall not be construed as a representation by the City of Tampa that the permittee herein complies with the terms and conditions of this permit, and does not relieve the permittee of its obligation to comply with all Federal and State pretreatment standards or requirements or with other applicable requirements under Federal, State, and/or local laws, rules, and regulations, including, but not limited to, Chapter 26 of the City of Tampa Code, and the provisions of the City of Tampa's Wastewater Discharge and Industrial Pretreatment Standards Technical Manual as updated March 2013, as amended, hereinafter referred to as the "Technical Manual." Compliance with this permit does not relieve the permittee of responsibility for compliance with all applicable Federal and State pretreatment standards, including those which become effective during the term of this permit. Noncompliance with any term or condition of this permit shall constitute a violation of Chapter 26 of the City of Tampa Code entitled "Utilities" and the Technical Manual.

This permit shall become effective on March 1, 2014
and shall expire at midnight on February 28, 2016

If the permittee wishes to continue to discharge after the expiration date of this permit, an application must be filed for a renewal permit a minimum of ninety (90) days, in accordance with the requirements of Section 4.5 of the above described Technical Manual, prior to the expiration date.

Director, Wastewater Department — Date 03/02/14

Page 1 of 25

Industry Name Universal Environmental Solutions, LLC Permit No. 1112

PART 1 - APPLICABLE EFFLUENT LIMITATIONS

SECTION 1 - EFFLUENT DISCHARGE LIMITS

A. During the period of this permit, the permittee is authorized to discharge process wastewater to the City of Tampa from only the outfall described below.

Description of outfalls:

Outfall	Description
001	Outfall 001 is the manhole located several feet east of the pretreatment building. All process wastewater is discharged to the City of Tampa from this outfall.

B. During the period of this permit the discharge from outfall 001 must comply with the following pretreatment regulations established in 40 CFR Part 437 - Subpart D (Centralized Waste Treatment Point Source Category - Multiple Wastestreams).

40 CFR Part 437 - Subpart D
Centralized Waste Treatment Point Source Category - Multiple Wastestreams
437.47 Pretreatment Standards for New Sources (PSNS)

Parameter	Maximum Daily Milligrams per liter (mg/l)	Maximum Monthly Avg. Milligrams per liter (mg/l)
Antimony	0.249	0.206
Arsenic	0.162	0.104
Cadmium	0.474	0.0962
Chromium	0.746	0.323
Cobalt	0.192	0.124
Copper	0.500	0.242
Lead	0.350	0.160
Mercury	0.00234 [1]	0.000739 [2]
Nickel	3.95 [1]	1.45 [2]
Silver	0.120	0.0351
Tin	0.409	0.120
Titanium	0.0947	0.0618
Vanadium	0.218	0.0662
Zinc	2.87	0.641

Industry Name Universal Environmental Solutions, LLC Permit No. 1112

Parameter	Maximum Daily Milligrams per liter (mg/l)	Maximum Monthly Avg. Milligrams per liter (mg/l)
Bis(2-ethylhexyl) phthalate	0.215	0.101
Carbazole	0.598	0.276
o-Cresol	1.92	0.561
p-Cresol	0.698	0.205
n-Decane	0.948	0.437
Fluoranthene	0.0537	0.0268
n-Octadecane	0.589	0.302
2,4,6-Trichlorophenol	0.155	0.106

[1] - Note that the limitations in PART 1 SECTION 1 Paragraph C are more stringent.
[2] - City of Tampa code does not establish Maximum Monthly Average concentration limits, however the concentration of any pollutant regulated by City of Tampa code and discharged into the wastewater treatment system cannot exceed the applicable Daily Maximum concentration limit. Note that the limitations in PART 1 SECTION 1 Paragraph C are more stringent.

C. During the period of this permit the discharge from the facility at the point where the discharge enters the City's sanitary sewer system shall not exceed the following effluent limitations. In addition, the discharge shall comply with all applicable regulations and standards contained in Chapter 26, City of Tampa code.

Parameter	Daily Maximum mg/l
Arsenic as As	0.21
Beryllium as Be	0.001
Cadmium as Cd	0.13
Chromium as Cr (Total)	2.77
Copper as Cu	0.67
Lead as Pb	0.80
Mercury as Hg	0.0002
Molybdenum as Mo	0.10
Nickel as Ni	0.42
Selenium as Se	0.47
Silver as Ag	1.80
Zinc as Zn	4.60
Oil & Grease (Mineral fraction)	100.0
pH	6.0 - 11.0

Page 3 of 25

Industry Name Universal Environmental Solutions, LLC Permit No. 1112

PART 2 - MONITORING AND REPORTING REQUIREMENTS

SECTION 1 - MONITORING REQUIREMENTS

A. During the period of this permit, the permittee shall monitor outfall 001 for the following:

Parameter	Location	Frequency	Sample Type
pH	(1)	(2) Quarterly	(3) Grab
Antimony	(1)	(2) Quarterly	(3) Grab
Arsenic	(1)	(2) Quarterly	(3) Grab
Cadmium	(1)	(2) Quarterly	(3) Grab
Chromium	(1)	(2) Quarterly	(3) Grab
Cobalt	(1)	(2) Quarterly	(3) Grab
Copper	(1)	(2) Quarterly	(3) Grab
Lead	(1)	(2) Quarterly	(3) Grab
Mercury	(1)	(2) Quarterly	(3) Grab
Nickel	(1)	(2) Quarterly	(3) Grab
Silver	(1)	(2) Quarterly	(3) Grab
Tin	(1)	(2) Quarterly	(3) Grab
Titanium	(1)	(2) Quarterly	(3) Grab
Vanadium	(1)	(2) Quarterly	(3) Grab
Zinc	(1)	(2) Quarterly	(3) Grab
Bis(2-ethylhexyl) phthalate	(1)	(2) Quarterly	(3) Grab
Carbazole	(1)	(2) Quarterly	(3) Grab
o-Cresol	(1)	(2) Quarterly	(3) Grab
p-Cresol	(1)	(2) Quarterly	(3) Grab
n-Decane	(1)	(2) Quarterly	(3) Grab
Fluoranthene	(1)	(2) Quarterly	(3) Grab
n-Octadecane	(1)	(2) Quarterly	(3) Grab
2,4,6-Trichlorophenol	(1)	(2) Quarterly	(3) Grab
Purgeable Organics	(1)	(2) Quarterly	(3) Grab
Total Dissolved Solids	(1)	(2) Quarterly	(3) Grab
Chloride	(1)	(2) Quarterly	(3) Grab

(1) - Outfall 001

(2) - January, April, July, and October

(3) - Definitions of sample types are located in PART 4 SECTION 1 of this permit.

Page 4 of 25

Industry Name Universal Environmental Solutions, LLC Permit No. 1112

B. Analytical Requirements

1. All activities related to sampling and analysis shall be performed in accordance with Chapter 62-160, F.A.C. and 40 CFR 136 as appropriate. Sample collection methods shall be consistent with the standard operating procedures defined in the most recent revisions of DEP-SOP-001/01. Analyses must be performed by a laboratory certified by the State of Florida, Department of Health, Bureau of Laboratories, to be in compliance with the NELAC (National Environmental Laboratory Accreditation Conference) Standards and FAC Rule 64E-1 regulations for the examination of environmental samples in the appropriate category.

2. Where sampling or analytical techniques for a pollutant are not available or approved, or where the State of Florida, Department of Environmental Protection (FDEP), determines that the sampling and analytical techniques are inappropriate for the pollutant in question, sampling and analysis shall be performed by using analytical methods or any other applicable sampling and analytical procedures, including procedures suggested by the City of Tampa or other parties, for which method validation information has been submitted and approved by the FDEP in accordance with Rules 62-160.430, 62- 160.520 and 62-160.530, F.A.C.

3. *Bis(2-ethylhexyl) phthalate, Carbazole, o-Cresol, p-Cresol, n-Decane, Fluoranthene, n-Octadecane, and 2,4,6-Trichlorophenol* shall be analyzed in accordance with EPA Methods 625 or 8270D.

4. *Purgeable Organics* shall be analyzed in accordance with EPA Method 624.

SECTION 2 - REPORTING REQUIREMENTS

A. Monitoring Reports

1. Analytical monitoring results obtained shall be summarized and reported as follows:

   a. Monitoring reports shall be submitted within 30 days of receiving the analytical data. The report shall include:

      - copies of the analytical results and the sample chain of custody form, and
      - a signed cover sheet with the certification statement established in PART 4 SECTION 5 (C) of this permit.

B. Pursuant to the reporting requirements of 62-625.600(6)(e) F.A.C., the results of all monitoring performed more frequently than required by this permit, using test procedures approved under PART 2 SECTION 1 (B), shall be submitted with the report.

Industry Name Universal Environmental Solutions, LLC Permit No. 1112

C. When a self-monitoring report shows any violation of the applicable standards included in PART 1 of this permit, the permittee must resample and submit both results within thirty (30) days of receiving original sample results, except the permittee is not required to resample if:

(1) The City of Tampa performs sampling at the permittee at a frequency of at least once per month, or

(2) The City of Tampa performs sampling at the permittee between the time when the permittee performs its initial sampling and the time when the permittee receives the results of this sampling.

D. **The permittee must notify the City of Tampa, Wastewater Department, Industrial Waste Section by telephone, within twenty-four (24) hours of receipt of monitoring results, if the results indicate any violation of applicable standards. The current telephone number at date of issuance of this permit is (813) 247-3451.**

It shall be the permittee's responsibility to ensure that it has updated contact information for the City of Tampa, Wastewater Department, Industrial Waste Section in order to provide all required verbal and written notices as required under this permit.

E. Signatory requirements are established in Part 4 Section 5 (C) of this permit.

F. Reports of Potential Problems

1. In the case of any discharge, including but not limited to, accidental discharges, discharges of a non-routine, episodic nature, a non-customary batch discharge, or a slug load, that may cause potential problems for the POTW, the user shall immediately telephone (currently 813-247-3451 at date of issuance of this permit, or as changed) and notify the City of Tampa, Wastewater Department, Industrial Waste Section of the incident. This notification shall include the location of discharge, type of waste, concentration and volume, if known, and corrective actions taken by the user.

2. Within five (5) days following such discharge, the user shall, unless waived by the Director, submit a detailed written report describing the cause(s) of the discharge and measures to be taken by the user to prevent similar future occurrences. Such notification shall not relieve the user of any expense, loss, damage, or other liability which may be incurred as a result of damage to the POTW, natural resources, or any other damage to person or property; nor shall such notification relieve the user of any fines, penalties, or other liability which may be imposed pursuant to the regulations and standards contained in Chapter 26, City of Tampa code.

3. A notice shall be permanently posted on the user's bulletin board, or other prominent place, advising employees or its agents who to call in the event of a discharge described in Section 2(F)(1), above. Users shall insure that all employees and/or agents who may cause or suffer such a dangerous discharge to occur are advised of the emergency notification procedure.

Industry Name Universal Environmental Solutions, LLC Permit No. 1112

4. All written reports required of this permit shall be submitted to:

City of Tampa
Industrial Waste Section
2700 Maritime Blvd.
Tampa, FL 33605.

PART 3 - SPECIAL CONDITIONS / COMPLIANCE SCHEDULES

1. Universal Environmental Services is permitted to discharge fully treated bilge water and tank wash water removed from ships that are berthed only within the City of Tampa service area. The service area includes Port Tampa, Port of Tampa, and Port Sutton. Port Manatee is not in the service area.

2. It is permissible to treat and discharge water collected during an oil spill emergency remediation within Tampa Bay.

3. The discharge of any treated or untreated land based fuel storage vessel bottom waters or washings, gasoline contaminated water, or hydrocarbon solvent contaminated water, groundwater, or stormwater is strictly prohibited, **unless expressly authorized by the Department**.

4. It shall be the goal of the permittee to avoid discharging wastewater having a concentration of Total Dissolved Solids exceeding 20,000 mg/l by blending different sources of wastewater or by other means. The concentration of Total Dissolved Solids in any wastewater discharged by the permittee over and above an initial 50,000 gallons per day shall not exceed 7,500 mg/l.

5. Compulsory daily wastewater discharge flow limits may be imposed based on the facility's pollutant loading and the potential impact on the treatment works.

6. The City of Tampa, at its discretion, may collect split samples of wastewater.

7. Initial Certification Statement

Within sixty (60) days after the issuance of this permit, the permittee shall submit a written statement to the City of Tampa, Industrial Waste Section, that is signed by an authorized representative of the company. The statement must:

a. List and describe the subcategories of wastes accepted for treatment at the facility;

b. List and describe the treatment systems in-place at the facility and conditions under which the treatment

systems are operated for the subcategories of wastes accepted for treatment at the facility;

c. Include information and supporting data establishing that these treatment systems will achieve equivalent treatment.

8. Periodic Certification Statement

During the effective period of this permit, the permittee shall submit a written statement to the City of Tampa, Industrial Waste Section, in the month of December, which certifies that the facility is operating its treatment systems to provide equivalent treatment as set forth in the initial certification. In the event that the facility has modified its treatment systems, the facility should submit a description of the modified systems and information and supporting data to establish that the modified system will achieve equivalent treatment. The periodic certification statement must be signed by an authorized representative of the company.

9. On-site Compliance Paperwork

On-site compliance paperwork means data or information retained in the office of the permittee which supports the initial and periodic certifications statements. This paperwork must:

a. List and describe the subcategory wastes being accepted for treatment at the facility;

b. List and describe the treatment systems in-place at the facility, modifications to the treatment systems and the conditions under which the systems are operated for the subcategories of wastes accepted for treatment at the facility;

c. Provide information and supporting data establishing that these treatment systems will achieve equivalent treatment;

d. Describe the procedures it follows to ensure that its treatment systems are well-operated and maintained; and

e. Explain why the procedures it has adopted will ensure its treatment systems are well-operated and maintained.

The permittee will maintain at the office of the permittee and make available for inspection the on-site compliance paperwork.

Industry Name Universal Environmental Solutions, LLC Permit No. 1112

PART 4 - STANDARD CONDITIONS

SECTION 1 - ABBREVIATIONS

AWTP	Advanced Wastewater Treatment Plant
CFR	Code of Federal Regulations
EPA	U.S. Environmental Protection Agency
F.A.C.	Florida Administrative Code
FDEP	Florida Department of Environmental Protection
RCRA	Resource Conservation and Recovery Act

SECTION 2 - DEFINITIONS

A. Authorized Representative or Duly Authorized Representative of the User or Industrial User – shall mean:

1. If the user is a corporation, the responsible corporate officer means:

   a. The president, secretary, treasurer or vice-president of a corporation in charge of a principal business function, or any other person who performs similar policy or decision-making functions for the corporation; or

   b. The manager of one or more manufacturing, production, or operating facilities provided the manager;

      1. Is authorized to make management decisions which govern the operation of the regulated facility, including having the explicit or implicit duty of making capital investment recommendations;

      2. Is authorized to initiate and direct other comprehensive measures to assure long-term environmental compliance with environmental laws and regulations;

      3. Can ensure that the necessary systems are established or actions taken to gather complete and accurate information for individual wastewater discharge permit requirements, and/or other control mechanism requirements as set forth in Rule 62-625.500(2)(a)2 F.A.C.;

      4. Has been assigned or delegated the authority to sign documents in accordance with corporate procedures.

2. The user or a general user is a partnership or sole proprietorship; a general partner or sole proprietor, respectively.

3. The user is a federal, state, or local government facility; a director or highest official appointed or designated to oversee the operation and performance of the activities of the government facility, or their designee.

Industry Name Universal Environmental Solutions, LLC Permit No. 1112

4. The individuals described in paragraphs one (1) through three (3) above, may designate a duly authorized representative, if the authorization is in writing, the authorization specifies the individual or position responsible for the overall operation of the facility from which the discharge originates or having overall responsibility for environmental matters for the company, and the written authorization is submitted to the City of Tampa.

B. Composite Sample - shall mean a sample collected over time, formed either by continuous sampling or by mixing discrete samples.

C. Daily Maximum Limits - shall mean the maximum allowable discharge limit of a pollutant during a calendar day. Where Daily Maximum Limits are expressed in units of mass, the daily discharge is the total mass discharged over the course of the day. Where Daily Maximum Limits are expressed in terms of a concentration, the daily discharge is the arithmetic average measurement of the pollutant concentration derived from all measurements taken that day.

D. Grab Sample - shall mean a single "dip and take" sample collected at a representative point in the discharge system.

E. Monthly Average - shall mean the average results of all sampling, either grab samples or 24-hour composite samples, taken during a calendar month

F. Official shall mean the Wastewater Department Director and/or his or her designee.

G. Publicly Owned Treatment Works (POTW) - shall mean the following:

1. The treatment works (as defined by Section 212 of the Clean Water Act ("Act") which is owned by a state or municipality (as defined by Section 502(4) of the Clean Water Act ("Act"); and

2. A facility which discharges wastes into waters of the state, or which can reasonably be expected to be a source of water pollution and includes any or all of the following: the collection and transmission system, the wastewater treatment works, the reuse or disposal system, and the residuals management facility; and

3. Includes any devices and systems used in the storage, treatment, recycling and reclamation of municipal sewage or industrial wastes of a liquid nature; and

4. Includes sewers, pipes and other conveyance only if they convey wastewater to the POTW treatment plant. POTW as used in this permit references the City of Tampa's Treatment Works.

H. Slug - shall mean any discharge of water or wastewater in which the concentration of any given pollutant or the rate of flow exceeds more than five (5) times the allowable discharge limit of concentration or average of flow during a normal working day (i.e., one, two or three-shift operation) and continues for a period of more than fifteen (15) minutes, or the discharge of any pollutant, including oxygen-demanding pollutants (BOD, etc.),

released in a discharge at a flow rate and/or pollutant concentration which will cause interference with the treatment works.

I. Technical Manual/Technical Standards shall mean that the Official may establish technical standards setting forth administrative guidelines governing enforcement of the City of Tampa Code Chapter 26, "Utilities Ordinance," Article I ("Administrative Provisions"), Article III ("Wastewater Department Ordinance"), and Article VII ("Grease Management Ordinance") and any other information needed for the uniform and orderly administration of the above described City of Tampa Code provisions. The Official may also establish requirements not specifically addressed in the above described City of Tampa Code provisions, but necessary to their effective enforcement. The Official and/or City may also be required to establish requirements for enforcement under applicable federal or state law, rules, and/or regulations, and/or as a condition of the City's NPDES Permit. Such standards are to be published in the "City of Tampa's Wastewater Discharge and Industrial Pretreatment Standards Technical Manual," and as amended, which shall be on file in the office of the City Clerk at least seven (7) days prior to adoption thereof and shall be made available to the public for inspection and for duplication at cost. The "City of Tampa's Wastewater Discharge and Industrial Pretreatment Standards Technical Manual," and as amended, adopted by reference, shall have the force and effect of law as a municipal ordinance, subject to the requirements of federal or state law, rules, and/or regulations.

J. Upset – shall mean an exceptional incident in which there is unintentional and temporary noncompliance with categorical pretreatment standards because of factors beyond reasonable control of the industrial user.

K. User – means any person who directly or indirectly discharges, causes, or permits the discharge of wastewater into the POTW.

SECTION 3 - GENERAL CONDITIONS

A. Duty to Comply

The permittee must comply with all conditions of this permit, Chapter 26 of the City of Tampa Code, the Technical Manual, and all applicable Federal, State, or local laws, rules, and regulations in effect at the time of issuance of this permit, and that may become effective during the term of this permit.

Any violation of the terms and conditions of this permit shall be deemed a violation of the Technical Manual and subjects the permittee, or any other person, to the sanctions set forth in Sections 10 and 11 of the Technical Manual and/or as set forth in Part 4 Sections 7, 8, and 9 of this permit.

Failure to comply with the terms and conditions of this permit, Chapter 26 of the City of Tampa Code, the Technical Manual, and all applicable Federal, State, and/or local laws, rules and regulations may subject the permittee to administrative or judicial enforcement remedies. Administrative enforcement remedies include, but are not limited to, the suspension, modification and/or revocation of this permit. Judicial enforcement remedies include, but are not limited to, civil or criminal penalties, injunctive relief, and/or other legal remedies and relief as provided by law. These remedies are not exclusive and any, all, or any combination of these actions may be

taken against a noncompliant permittee or against any other person when circumstances warrant by the City of Tampa. See Sections 10 and 11 of the Technical Manual.

B. Duty to Mitigate

The permittee shall take all reasonable steps to minimize or correct any adverse impact on the environment, public health, worker health and safety, and POTW resulting from noncompliance with this permit, including such accelerated or additional monitoring as necessary to determine the nature and impact of the non-complying discharge.

C. Wastewater Discharge Permit Modification

The Director may modify a wastewater discharge permit for the good cause including, but not limited to, the following reasons::

1. To incorporate any new or revised federal, state, or local pretreatment standards or requirements;
2. To address significant alterations or additions to the user's operation, processes, or wastewater volume or character since the time of wastewater discharge permit issuance;
3. A change in the POTW that requires either a temporary or permanent reduction or elimination of the authorized discharge;
4. Information indicating that the permitted discharge poses a threat to the City's POTW, City personnel, or the receiving waters;
5. Violation of any terms or conditions of the wastewater discharge permit;
6. Misrepresentation or failure to fully disclose all relevant facts in the wastewater discharge permit application or in any required reporting;
7. Revision of or a grant of variance from categorical pretreatment standards pursuant to 40 CFR 403.13; Rule 62-625.700 F.A.C.;
8. To correct typographical or other errors in the wastewater discharge permit; or
9. To reflect a transfer of the facility ownership or operation to a new owner or operator.

D. Wastewater Discharge Permit Transfer

Wastewater discharge permits may be transferred to a new owner or operator only if the permittee gives at least thirty (30) days advance notice to the Director, and the Director approves the wastewater discharge permit

transfer. The notice to the Director must include a written certification by the new owner or operator which:

1. States that the new owner and/or operator have no immediate intent to change the facility's operations and processes;
2. Identifies the specific date on which the transfer is to occur; and
3. Acknowledges full responsibility for complying with the existing wastewater discharge permit.

Failure to provide advance notice of a transfer renders the wastewater discharge permit void as of the date of facility transfer.

E. Wastewater Discharge Permit Revocation

The director may revoke a wastewater discharge permit for good cause, including, but not limited to, the following reasons:

1. Failure to notify the Director of significant changes to the wastewater prior to the changed discharge;
2. Failure to provide prior notification to the Director of changed conditions pursuant to Part 4 Section 6 of this permit;
3. Misrepresentation or failure to fully disclose all relevant facts in the wastewater discharge permit application and/or any reports required under this ordinance;
4. Falsifying self-monitoring reports;
5. Tampering with monitoring equipment;
6. Refusing to allow the Director timely access to the facility premises and records;
7. Failure to meet effluent limitations;
8. Failure to pay fines;
9. Failure to pay sewer charges;
10. Failure to meet compliance schedules;
11. Failure to complete a wastewater survey or the wastewater discharge permit application;
12. Failure to provide advance notice of the transfer of business ownership of a permitted facility;

13. Violation of any pretreatment standard or requirement, or any terms of the wastewater discharge permit or Chapter 26, City of Tampa Code; or

14. Material or substantial alterations or additions to the discharger's operation that adversely impact the wastewater discharge and which were not in existence as of the date of the issued permit.

Wastewater discharge permits shall be voidable upon cessation of operations or transfer of business ownership. All wastewater discharge permits issued to a particular user are void upon the issuance of a new wastewater discharge permit to that user.

F. Wastewater Discharge Permit Reissuance

A user with an expiring wastewater discharge permit shall apply for wastewater discharge permit re-issuance by submitting a complete permit application, in accordance with Section 4 of the Technical Manual, a minimum of ninety (90) days prior to the expiration of the user's existing wastewater discharge permit.

G. Property Rights

The issuance of this permit does not convey any property rights of any sort, or any exclusive privileges, nor does it authorize any injury to private property or any invasion of personal rights, nor any infringement of Federal, State, and/or local laws, rules, or regulations.

H. Dilution

No user shall ever increase the use of process water, or in any way attempt to dilute a discharge, as a partial or complete substitute for adequate treatment to achieve compliance with a discharge limitation unless expressly authorized by an applicable pretreatment standard or requirement. The Director may impose mass limitations on users who are using dilution to meet applicable pretreatment standards or requirements; or in other cases when the imposition of mass limitations is appropriate.

I. Notification of the Discharge of Hazardous Waste

1. Any industrial user who discharges hazardous waste shall notify the director, the POTW Wastewater Treatment Plant Manager, the EPA Regional Waste Management Division Director, and FDEP's hazardous waste and pretreatment authorities, in writing, of any discharge into the POTW of a substance which, if otherwise disposed of, would be a hazardous waste under 40 CFR Part 261 and/or Chapter 62-730, F.A.C. Such notifications must include the name of the hazardous waste as set forth in 40 CFR Part 261, and/or Chapter 62-730, F.A.C., the EPA hazardous waste number, and the type of discharge (continuous, batch, or other). If the industrial user discharges more than one hundred (100) kilograms of such waste per calendar month to the POTW, the notification shall also contain the following information to the extent such information is known and readily available to the industrial user:

a. An identification of the hazardous constituents contained in the wastes;

b. An estimation of the mass and concentration of such constituents in the waste stream discharged during that calendar month; and

c. An estimation of the mass of constituents in the waste stream expected to be discharged during the following twelve (12) months.

All industrial users shall provide the notification no later than one hundred eighty (180) days after the discharge of the listed or characteristic hazardous waste. Any notification under this paragraph needs to be submitted only once for each hazardous waste discharged. However, notifications of changed conditions of each of the hazardous waste discharges must be submitted under 40 CFR 403.12(j) and Section 6.5 of the Technical Manual. The notification requirement in this paragraph does not apply to pollutants already reported by users subject to categorical pretreatment standards under the self-monitoring requirements of 40 CFR 403.12(b), (d), and (e), and Sections 6.1, 6.3, and 6.4 of the Technical Manual.

2. Dischargers are exempt from the requirements of 40 CFR 403.12(p)(1) and paragraph 1., above, during a calendar month in which they discharge no more than fifteen (15) kilograms of hazardous wastes, unless the wastes are acute hazardous wastes as specified in 40 CFR 261.30(d) and 261.33(e) and/or Chapter 62-730, F.A.C. Discharge of more than fifteen (15) kilograms of non-acute hazardous wastes in a calendar month, or any quantity of acute hazardous wastes as specified in 40 CFR 261.30 (d) and 261.33(e) and/or Chapter 62-730 F.A.C., requires a one (1) time notification. Subsequent months during which the industrial user discharges more than such quantities of any hazardous waste do not require additional notification.

3. In the case of any new FDEP and/or EPA regulations under Section 3001 of RCRA identifying additional characteristics of hazardous waste or listing any substance as a hazardous waste, the industrial user must notify the Director, the POTW Wastewater Treatment Plant Manager, the EPA Regional Waste Management Division director, and FDEP's hazardous waste and pretreatment authorities of the discharge of such substance within ninety (90) days of the effective date of such regulations.

4. In the case of any notification made under this Section, the industrial user shall certify that it has a program in place to reduce the volume and toxicity of hazardous wastes generated to the degree it has determined to be economically practical.

5. This provision does not create a right to discharge any substance not otherwise permitted to be discharged by this ordinance, a permit issued thereunder, or any applicable federal or state law,.

J. Personnel Safety

The permittee shall provide safe inspection conditions for City of Tampa, and/or any State or Federal pretreatment program personnel, agents, and /or their designated representatives and shall provide such personnel with all necessary safety information regarding the facility's safety policy pertaining to required

Industry Name Universal Environmental Solutions, LLC Permit No. 1112

personal safety gear.

SECTION 4 - OPERATIONS AND MAINTENANCE OF POLLUTION CONTROLS

A. Pretreatment Facilities

The permittee shall provide wastewater treatment as necessary to comply with the conditions in this permit and the standards expressed in Chapter 26, City of Tampa Code, and shall achieve compliance with all categorical pretreatment standards, local limits, and the prohibitions set out in Section 2 of the Technical Manual within the time limitations specified by the EPA, the state of Florida, or the Director, whichever is more stringent. Any facilities necessary for compliance shall be provided, operated, and maintained at the user's expense. Detailed plans describing such facilities and operating procedures shall be submitted to the Director for review, and shall be acceptable to the Director before such facilities are constructed. The review of such plans and operating procedures shall in no way relieve the user from the responsibility of modifying such facilities as necessary to produce a discharge acceptable to the City under provisions of this ordinance.

B. Duty to Halt or Reduce Activity

Upon reduction, loss or failure of the pretreatment facility, the permittee shall, to the extent necessary to maintain compliance with its permit, control production or all discharges or both until operation of the pretreatment facility is restored. It shall not be a defense for a permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit.

C. Bypass of Treatment Facilities

1. For the purposes of this Section,

   a. "Bypass" means the intentional diversion of waste streams from any portion of a user's treatment facility.

   b. "Severe property damage" means substantial physical damage to property, damage to the treatment facilities which causes them to become inoperable, or substantial and permanent loss of natural resources which can reasonably be expected to occur in the absence of a bypass. Severe property damage does not mean economic loss caused by delays in production.

2. A user may allow any bypass to occur which does not cause pretreatment standards or requirements to be violated, but only if it also is for essential maintenance to assure efficient operation. These bypasses are not subject to the provisions of paragraphs 3, 4, 5, and 6 of this Section.

3. If a user knows in advance of the need for a bypass, it shall submit prior notice to the Director, at least ten (10) days before the date of the bypass, if possible.

4. A user shall submit oral notice to the Director of an unanticipated bypass that exceeds applicable pretreatment standards within twenty-four (24) hours from the time it becomes aware of the bypass. A written submission shall also be provided within five (5) days of the time the user becomes aware of the bypass. The written submission shall contain a description of the bypass and its cause; the duration of the bypass, including exact dates and times, and, if the bypass has not been corrected, the anticipated time it is expected to continue; and steps taken or planned to reduce, eliminate, and prevent reoccurrence of this bypass. The Director may waive the written report on a case-by-case basis if the oral report has been received within twenty-four (24) hours.

5. Bypass is prohibited, and the Director may take an enforcement action against a user for bypass, unless:

   a. Bypass was unavoidable to prevent loss of life, personal injury, or severe property damage;

   b. There were no feasible alternatives to the bypass, such as the use of auxiliary treatment facilities, retention of untreated wastes, or maintenance during normal periods of equipment downtime. This condition is not satisfied if adequate back-up equipment should have been installed in the exercise of reasonable engineering judgment to prevent a bypass which occurred during normal periods of equipment downtime or preventive maintenance; and

   c. The user submitted notices as required under paragraphs 3 and 4 of this Section.

6. The Director may approve an anticipated bypass, after considering its adverse effects, if the Director determines that it will meet the three conditions listed in paragraph 5 of this Section.

D. Removed Substances

Solids, sludges, filter backwash, or other pollutants removed in the course of treatment or control of wastewaters shall be disposed of in accordance with section 405 of the Clean Water Act and Subtitles C and D of the Resource Conservation and Recovery Act.

SECTION 5 - MONITORING AND RECORDS

A. Right of Entry: Inspection and Sampling

The Director shall have the right to enter the premises of any user to determine whether the user is complying with all requirements of this ordinance, and any wastewater discharge permit or order issued hereunder. Users shall allow the Director ready access to all parts of the premises for the purposes of inspection, sampling, records examination and copying, and the performance of any additional duties.

1. Where a user has security measures in force which require proper identification and clearance before entry into its premises, the user shall make necessary arrangements with its security guards so that, upon presentation of suitable identification, the Director will be permitted to enter without delay for the purposes

of performing specific responsibilities.

2. The Director shall have the right to set up on the user's property, or require installation of, such devices as are necessary to conduct sampling and/or metering of the user's operations.

3. The Director may require the user to install monitoring equipment as necessary. The facility's sampling and monitoring equipment shall be maintained at all times in a safe and proper operating condition by the user at its own expense. All devises used to measure wastewater flow and quality shall be calibrated regularly to ensure their accuracy.

4. Any temporary or permanent obstruction, to safe and easy access to the facility to be inspected and/or sampled, shall be promptly removed by the user at the written or verbal request of the Director and shall not be replaced. The costs of clearing such access shall be borne by the user.

5. Unreasonable delays in allowing the Director access to the user's premises shall be a violation of this ordinance.

6. While performing the necessary work on private properties referred to in this Section, the Director and duly authorized employees of the Department shall observe all applicable safety rules. The user shall provide safe inspection conditions for the Director, and shall provide all necessary safety information regarding the facility's safety policy pertaining to required personal safety gear.

7. User shall pay for the reasonable costs incurred by the Director related to the inspections and monitoring of wastewater discharge at user's facility.

B. Record Keeping Requirements

1. Users or Industrial Users subject to the reporting requirements of this ordinance shall retain, and make available for inspection and copying, all records of information obtained pursuant to any monitoring activities required by this ordinance, and any additional records of information obtained pursuant to monitoring activities undertaken by the user or industrial user independent of such requirements, and including documentation associated with Best Management Practices established under Section 2.3 E of the Technical Manual.

Records shall include for all samples:

a. The date, exact place, method, time of sampling, and the name of the person(s) taking the samples;
b. The dates analyses were performed;
c. Who performed the analyses;
d. The analytical techniques or methods used
e. The results of such analyses; and
f. Proper chain of custody documentation.

Industry Name Universal Environmental Solutions, LLC Permit No. 1112

2. These records shall remain available for a period of at least three (3) years. This period shall be automatically extended for the duration of any unresolved litigation concerning the user or industrial user and/or the City, or where the user or industrial user has been specifically notified of a longer retention period by the Director.

C. Signatory Requirements and Certification Statements

All applications, permits, reports or information required to be submitted to the Director and/or the City under this ordinance shall be signed and certified as set forth below:

1. Certification of Permit Applications, and/or User or Industrial User Reports.

   a. The certification statement described below in paragraph 1.b is required to be signed and submitted by the person making the request, who is submitting the following documents:

      i. Permit applications in accordance with Sections 3.6 and 4.5 of the Technical Manual;

      ii. Users or industrial users submitting baseline monitoring reports in accordance with Section 6.1 of the Technical Manual;

      iii. Users or industrial users submitting reports on compliance with the categorical pretreatment standard deadlines in accordance with Section 6.3 of the Technical Manual; and

      iv. Users or industrial users submitting periodic compliance reports in accordance with Section 6 of the Technical Manual.

   b. The following certification statement must be signed on the above described documents by an authorized representative defined in Part 4 Section 2 above:

"I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations."

2. Changes of Authorized Representative Designation. If the designation of the authorized representative changes and/or is no longer accurate because a different individual or position has responsibility for the overall operation of the facility or overall responsibility for environmental matters for the company, the new Authorized Representative is required to submit to the Director within thirty (30) days of this change the following documents:

a. A new written authorization satisfying the requirements of the above Part 4 Section 2's definition of "Authorized Representative or Duly Authorized Representative of the User or Industrial User;" and

b. New signatures and certification statements are required for all of the above described documents and as otherwise required by this ordinance.

c. New signatures and certification statements are required to be submitted to the Director and/or City on all documents required to be signed and/or certified under this ordinance.

SECTION 6 - ADDITIONAL REPORTING REQUIREMENTS

A. Accidental Discharge / Slug Control Plans

At least once every two (2) years, the Director shall evaluate whether each significant industrial user needs an accidental discharge/slug control plan. The Director may require any user to develop, submit for approval, and implement such a plan. Alternatively, the Director may develop such a plan for any user. An accidental discharge/slug control plan shall address, at a minimum, the following:

1. Description of discharge practices, including non-routine batch discharges;

2. Description of stored chemicals;

3. Procedures for immediately notifying the Director of any accidental or slug discharge, as required by Part 2 Section 2(F) of this permit; and

4. Procedures to prevent adverse impact from any accidental or slug discharge. Such procedures include, but are not limited to, inspection and maintenance of storage areas, handling and transfer of materials, loading and unloading operations, control of plant site runoff, worker training, building of containment structures or equipment, measures for containing toxic organic pollutants, including solvents, and/or measures and equipment for emergency response.

B. Reports of Changed Conditions

Each user must notify the Director of any planned significant changes to the user's operations or system which might alter the nature, quality, or volume of its wastewater at least ninety (90) days before the change.

1. The Director may require the user to submit such information as may be deemed necessary to evaluate the changed condition, including the submission of a wastewater discharge permit application under Section 4.5 of the Technical Manual.

2. The Director may issue a wastewater discharge permit under Section 4.7 of the Technical Manual, or modify

an existing wastewater discharge permit under Section 5.4 of the Technical Manual, in response to changed conditions or anticipated changed conditions.

3. For purposes of this requirement significant changes include, but are not limited to, flow increases of twenty percent (20%) or greater, and the discharge of any previously unreported pollutants.

C. Duty to Provide Information

The permittee shall furnish to the City of Tampa, within a reasonable time, at a frequency determined by the Wastewater Director, any information which the City of Tampa may request to determine whether cause exists for modifying, revoking and reissuing, or terminating this permit, or to determine compliance with this permit. The permittee shall also furnish to the City of Tampa upon request, copies of records required to be kept by this permit.

SECTION 7 – ADMINISTRATIVE ENFORCEMENT REMEDIES

A. Remedies for Violations

The permittee, violating any of the provisions of this permit, is subject to the Administrative Enforcement Remedies pursuant to Chapter 26 of the City of Tampa Code and the Technical Manual.

SECTION 8 – JUDICIAL ENFORCEMENT REMEDIES

A. Civil and Criminal Liability

In addition to other remedies for enforcement provided herein, the Director, through the City Attorney, may petition Hillsborough County, the state of Florida, the United States Department of Justice, or any other tribunal as appropriate, to exercise such methods or remedies as shall be available to such government entities to seek criminal or civil penalties, injunctive relief, or such other remedies as may be provided by applicable county, state or federal laws to ensure compliance by industrial users of applicable pretreatment standards, to prevent the introduction of toxic pollutants or other regulated pollutants into the POTW, or to prevent such other water pollution as may be regulated by county, state or federal law.

SECTION 9 - PENALTIES

A. Penalties for Violations

Any user who is found to have violated any provision of the pretreatment standards, requirements, or conditions set forth in a wastewater discharge permit issued hereunder, or the Department's pretreatment orders, rules or regulations, and/or any pretreatment standard or requirement, shall be, upon conviction, subject to penalties pursuant to Chapter 26 of the City of Tampa Code, and the Technical Manual. Each separate violation shall constitute a separate offense and upon conviction of a specified ordinance violation, each day of violation shall

Industry Name Universal Environmental Solutions, LLC Permit No. 1112

constitute a separate violation.

SECTION 10 – MISCELLANEOUS PROVISIONS

A. Severability

The provisions of this permit are severable, and if any provision of this permit, or the application of any provision of this permit to any circumstance, is held invalid, the application of such provision to other circumstances, and the remainder of this permit, shall not be affected thereby.

Industry Name Universal Environmental Solutions, LLC Permit No. 1112

Acceptance of Permit

Universal Environmental Solutions, LLC accepts the conditions of the
(name of company)

permit and agrees to meet the conditions herein.

Permit period: March 1, 2014 through February 28, 2016

By E. Kinley 03/05/14
(signature) (date)

*Name Ed Kinley

Title President

* Must be the owner or an authorized representative of the company.

Industry Name Universal Environmental Solutions, LLC Permit No. 1112

Acceptance of Permit

Universal Environmental Solutions, LLC accepts the conditions of the
(name of company)

permit and agrees to meet the conditions herein.

Permit period: March 1, 2014 through February 28, 2016

By E. Kinley 03/05/14
(signature) (date)

*Name Ed Kinley

Title President

* Must be the owner or an authorized representative of the company.

(Return this signed page to the Industrial Waste Division)

Page 25 of 25

ATTACHMENT 5 – SLUDGE, RESIDUE and BYPRODUCT MANAGEMENT DESCRIPTION

5.0 SLUDGE, RESIDUE AND BYPRODUCT MANAGEMENT DESCRIPTION

This document is a brief description of the management of the sludge waste created by the oily water processing activities. Sludge, residue and byproducts solid wastes requiring processing are created by settling in the primary filtration tanks described in Attachment 2 of this permit or created during the primary DAF system wash down process. This facility does not accept sludge wastes as determined in **Attachment 5** in this permit submission.

Sludge collected at the bottom of the flow through tanks are periodically removed from the bottom of the tanks using a dual-diagram pump. The waste sludge is transferred to an onsite roll-off detailed as **Figure 1.3.1** of the permit submission.

When the roll-off has reached 2/3 capacity a waste characterization sample is collected using the protocols detailed in the Attached Waste and Sampling Plan. The sludge contained within the box is characterized and disposed utilizing a certified hauler and approved waste landfill.

The attached sludge roll off laboratory analysis is the plant's baseline analytical. Prior to sludge disposal or semi-annually until disposal the sludge waste will be sampled and analyzed for the waste parameters, as required under 40 CFR, Parts 279.10(e) and 279.59. Sludge sampling will follows procedure detailed in **Attachment 4** Waste Analyses and Sampling Plan.

A copy of the baseline sludge analytical results is attached under **Section 6.3** of this submission. No indication hazardous waste was found per FAC 62-730.030 and 40 CFR 261 was found in the sludge analytical results.

ATTACHMENT 6 – TRACKING PLAN

6.0 WASTE TRACKING PLAN

The UES facility uses standardized forms for the tracking of materials into and out of the processing plant. The processing plant operator utilizes the Acceptable Knowledge approach as a primary indicator of hazardous wastes and testing as a secondary approach all wastes prior to processing plant entry. A waste profile approval form is required from the generator prior to acceptance of the delivery of non-hazardous wastes from non-UES facility or deliveries that are from sources that have not been identified. A uniform non-hazardous waste manifest is used to track these non-UES outside sources prior to entry into the plant. The USE plant operator signature is required on the uniform non-hazardous waste manifest before wastes enter the processing plant. Non-hazardous waste from UES personnel are profiled using the attached UES Waste Profile and processed using the attached uniform non-hazardous waste manifest. A copy of the forms are detailed in the sections included in this attachment as well as a copy of the baseline sludge profile analytical data.

6.1 UES Standard Operating Procedures for Hazardous Waste Assessment of Used Oils Prior to Pickup

6.1.1 What are halogens? - Halogens are any compound containing chlorine, bromine, fluorine and iodine. The following wastes are often mixed with used oil and may be contaminated with halogenated organic product.

- Brake fluids
- Degreasers including petroleum distillates and mineral spirits
- Refrigerants (e.g., Freon)
- Paints
- Oil-based inks
- Antifreeze
- Carburetor cleaners

6.1.2 When is Used Oil considered a hazardous waste? - There are two primary approaches for determining whether the used oil is a hazardous waste.

- **First Approach** – Acceptable Knowledge (40 CFR 261.11 (c))

Process knowledge includes detailed information about the waste obtained from published or documented waste analysis data or studies conducted on wastes generated by processes similar to that which generated the waste in question.

- **Second Approach** – Testing (40 CFR 261.11 (c) and 40 CFR 761) Along with Acceptable Knowledge

Testing of the following four (4) hazardous waste characteristics are used to determine whether a used oil is a hazardous waste (Acceptable process knowledge can be substituted for one (1) or more the tests for the four (4) hazardous waste characteristics).

- Corrosivity
- Ignitability
- Reactivity
- Toxicity

1. **Corrosivity – pH**

An oil with a pH of less than or equal to 2 or greater than or equal to 12.5 are considered corrosive and hazardous and should not be picked up.

2. **Ignitability – Flash Point Determination**

An oil with a Flash Point below 140^{o}F (60^{o}C) are considered hazardous and should not be picked up. The Flash Point is the lowest temp at which vapors above a waste ignite when exposed to a flame.

3. **Reactivity – Liquid Reacts Violently or Explodes**

Other than the generator's knowledge, Oil is considered hazardous if any of the following characteristics are observed.

- Unstable and readily undergoes violent change without detonating
- Reacts violently or forms potentially explosive mixtures with water
- Releases toxic gases when mixed with water
- Is a cyanide or sulfide bearing waste that releases toxic gases when exposed to pH conditions between 2 and 12.5

4. **Toxicity - Based on the Potential to Contaminate Groundwater**

Oil is considered hazardous if it contains one (1) or more chemicals present out of a list of forty (40) chemicals at a concentration exceeding its Toxicity Characteristic Leaching Procedure (TCLP) concentration (see attached table). The purpose of the TCLP is to simulate the leaching that can occur in a landfill. Additionally, used oil is considered to be hazardous, if it contains more than 0.1 % or 1000 ppm (mg/L) of halogenated compounds or more than 50 ppm (50 mg/L) PCBs (40 CFR 761).

6.1.3 Why should we be concerned about the presence of halogenated compounds and PCBs in used oils? - Most used oil is recycled as fuel for industrial operations such as cement kilns and asphalt manufacturers. During the combustion process, some of the halogens (e.g., chlorine compounds) are chemically converted into hydrogen chloride. When combined with water, which also forms during the burning of fuels, hydrogen chloride becomes hydrochloric acid. Hydrochloric acid is a toxic compound that can corrode furnaces and threaten public health. Additionally, products created from the incomplete combustion of chlorine compounds, such as

dioxins, pose significant health risks in the exhaust. Additionally, the more volatile halogen compounds have been shown to damage the ozone layer.

6.1.4 How do I determine whether I can pick up a load of used oil? - There are two (2) primary approaches to be used for determining whether the oil you plan on picking up is hazardous or not. The first approach is based on Your and/or Your Client's "Acceptable Knowledge" about the processes that generated the oils to be picked up. The second approach involves on-site assessments involving the use of your experience (i.e., chlorinated solvent-type odors), scanning of the tank headspace or a sample bottle headspace using your Cen-Tech Halogen Leak Detector model 92514 for Halogens and/or the use of Dexsil Kits to assess the existence of halogens at concentrations above 1000 ppm.

6.1.4.1 "Acceptable Knowledge" - You must first determine how the used oil was generated based on your experience, the operation that generated the used oil and the generator's knowledge and management of their operation. If you and the generator are sure that the process that generated the used oil did not involve any mixing with hazardous waste and/or the probability was very low that a hazardous mixture was generated based on the procedures used to store the used oil, you can be reasonably certain that the oil is not hazardous. However, if you have any doubts about the used oil based on the information provided by the generator, your experience or other knowledge you have, you should perform some field testing to confirm that the used oil is not hazardous based on the 1000 ppm halogen standard threshold.

6.1.4.2 Testing - Scan the used oil with the TIF XP – 1A Automatic Halogen Leak Detector that you carry with you in your used oil transport truck. The following procedure along with the "Assembly and Operating Instructions Manual" is to be used for scanning the used oil with you your detector.

- Switch the unit on by pressing the on / off key. The display will illuminate with the reset indication (left LED green, all others Orange) for 2 seconds. Verify the battery level by observing the constant power indicator.
- Upon turn on, the unit is set the sensitivity level to "5". A rapid, but steady beep rate will be heard. If desired the sensitivity can be adjusted by pressing the SENSITIVITY **a** or SENSITIVITY **b** key.
- Begin Halogen detection operation. If halogens are detected, then the audible tone will change to a siren type sound, distinctly different from the base beep rate. Additionally, the visual indicators will light progressively.
- Orient the probe tip within a distance of no more than ¼-inch from the surface of the liquid to be scanned.
- If the probe tip cannot be placed within a ¼-inch of the fluid surface, use a pipette or the like to collect a sample of the liquid to be scanned for halogens.
- Place the sample in a small plastic cup.
- If the detector indicates that halogens are present within a ¼-inch of the fluid being scanned, use the Dexsil "Clor-D-Tect 1000" kit to determine if the total halogen concentration in the used oil is less than or greater than 1000 ppm.
- If the Dexsil "Clor-D-Tect 1000" kit indicates that the concentration of halogens is greater than 1000 ppm, do not take the oil and contact Bryan Russel or Ed Kinley.

6.1.5 Assessment Supplies to be maintained on Every Truck for Field Testing:

- One TIF XP – 1A Automatic Halogen Leak Detector in working order with good batteries.
- Two (2) Dexsil "Clor-D-Tect 1000" kits that have not expired.
- Liquid Drum sampler or the like for drawing a sample to be placed in a glass jar.
- Two plastic cups for scanning samples of used oil, if the detector probe tip cannot easily be placed within ¼-inch of the used oil surface.

6.1.6 Required Paperwork - Details of the sampling event, dates, times, analyses types and specifics sample collection information is maintained and tracked using the UES Waste Profile and Sample tracking form included in Section 6.2.1 and the laboratory Chain of Custody included as 6.2.3. After sampling has been conducted a copy of the laboratory chain of custody and profile sheet are retained in the laboratory in a labeled 3 ring binder. Sample identification nomenclature is determined by using the sampling location ID that is identified on the plant as-builts followed by the date. If multiple samples are taken from the same location within a single day, time is added to the sample id to differentiate samples.

6.2 Waste Tracking Documents

6.2.1 UES Waste Profile - This Waste profile is used to record, track and provide justification for no further analyses of a waste. A copy of this waste profile and sample tracking form is retained onsite for each delivery of waste product form is retained onsite by the plant operator.

Universal Environmental Solutions, LLC
1650 Hemlock St, Tampa , FL. 33605
Ph.# (813) 241 - 9206 Fax# (813) 241 -9215
US EPA ID Number: FLR000199802 Profile #: _____

A. Billing Information
Company _____ Account # _____
Address _____
City/State _____ Zip _____ Contact _____
Phone _____ Fax _____

B. Generator Information/Location of Waste
Generator EPA ID _____
Generator Name _____ Site Contact _____
Address _____
City/State _____ Zip _____
Contact Phone _____ Contact Fax _____
Type of Business _____ SIC Code _____

C. Waste Description
Common Name of Waste _____
Process Generating Waste _____

D. Physical Properties

Physical State	Odor	Color	Viscosity	Layers
☐ 100% Solid	☐ None	Describe: _____	☐ Low	_____ Top
☐ 100% Liquid	☐ Mild		☐ Medium	_____ Middle
☐ Sludge	☐ Strong		☐ High	_____ Bottom
_____ % Free Liquid	Describe _____			

Flash Point		pH		Water	
☐ <73 F	☐ 140-199 F	☐ < 2	☐ 9.1 - 12.4	☐ < 5%	☐ 30-80%
☐ 73-99 F	☐ >199 F	☐ 2.1 - 4.9	☐ > 12.5	☐ 5-10%	☐ 80-100%
☐ 100-139 F	☐ N/A	☐ 5 - 9	☐ N/A	☐ 10-30%	☐ N/A

E. Volume
Anticipated Volume: _____ ☐ Drums ☐ 5-Gallon ☐ 30-Gallon ☐ 55-Gallon ☐ Tote
☐ Bulk ☐ Tanker ☐ Pump Truck ☐ Other: _____
Estimated Frequency: ☐ Weekly ☐ Semimonthly ☐ Monthly ☐ Quarterly ☐ Other _____

F. Constituents
Total must be equal to 100%. All constituents, including debris must be identified.

Constituents	Actual %	Range

G. Other Hazards
☐ Radioactive
☐ Water Reactive
☐ Oxidizer
☐ OSHA
☐ Carcinogen
☐ Explosive
☐ Pesticide
☐ Polymerizable
☐ Organic Peroxide
☐ Infectious
☐ Pryophoric

H. Additional Information
1 Does the waste contain dioxins? ..... ☐ Yes ☐ No
2 Does the waste contain asbestos? ..... ☐ Yes ☐ No
3 Does the waste contain benzene? ..... ☐ Yes ☐ No
If yes, what is the concentration? _____ ppm
Is the waste subject to the benzene waste operations NESHAP? ..... ☐ Yes ☐ No
4 Is the waste subject to RCRA Subpart CC controls? ..... ☐ Yes ☐ No
5 Does the waste contain carcinogens that require OSHA notification? ..... ☐ Yes ☐ No

Form GTS87903

I. Constituents

These values are based on ☐ Generator Knowledge ☐ Analytical Results

Inorganic

Metals	Limit	Level (mg/l)
D004 Arsenic	5.0	
D005 Barium	100.0	
D006 Cadmium	1.0	
D007 Chromium	5.0	
D008 Lead	5.0	
D009 Mercury	0.2	
D010 Selenium	1.0	
D011 Silver	5.0	

Pesticides/Herbicides	Limit	Level (mg/l)
D012 Endrin	0.02	
D013 Lindane	0.4	
D014 Methoxychlor	10.0	
D015 Toxaphene	0.5	
D016 2,4-D	10.0	
D017 2,4,5-TP	400.0	
D020 Chlordane	0.03	
D031 Heptachlor	0.008	

Organic

Volatile Compounds	Limit	Level(mg/l)
D018 Benzene	0.5	
D019 Carbon Tetrachloride	0.5	
D021 Chlorobenzene	100.0	
D022 Chloroform	6.0	
D028 1,2-Dichloroethane	0.5	
D029 1,1-Dichloroethylene	0.7	
D035 Methyl Ethyl Ketone	200.0	
D039 Tetrachloroethylene	0.7	
D040 Trichloroethlene	0.5	
D043 Vinyl Chloride	0.2	

Semi-Volatile Compounds	Limit	Level (mg/l)
D023 o-Cresol	200.0	
D024 m-Cresol	200.0	
D025 p-Cresol	200.0	
D026 Cresol	200.0	
D027 1,4-Dichlorobenzene	7.5	
D030 2,4-Dinitrotoluene	0.13	
D032 Hexchlorobenzene	0.13	
D033 Hexachlorobutadiene	0.5	
D034 Hexachloroethane	3.0	
D036 Nitrolbenzene	2.0	
D037 Pentachlorophenol	100.0	
D038 Pyridine	5.0	
D041 2,4,5-Trichlorophenol	400.0	
D042 2,4,6-Trichlorophenol	2.0	

J. Wastewater Pre-Treatment Facility Certification

Inorganics

	Concentration
Ammonia	
Nitrogen	
Phosphorus	
Potassium	
Formaldahyde	
PCB's	
Antimony	
Cobalt	
Copper	
Nikel	
Tin	
Titanium	
Vanadium	
Zinc	

Organics

	Concentration
bis (2-ethylhexy) pthalate	
Carbazole	
N-decane	
Fluoranthene	
O-Octadecane	

Form GTS87903

K. D.O.T. Shipping Information

RCRA Hazardous Waste (per 40CFR261) ☐ Yes ☑ No State Regulated ☐ Yes ☐ No
USDOT Hazardous Material ☐ Yes ☐ No Used Oil ☐ Yes ☐ No

Proper USDOT Shipping Name: _____
DOT Hazard Class _____ UN/NA _____ Packing Group _____

L. Sample

Has a sample been included? ☑ Yes ☐ No If yes, sampled by: _____ Date _____

M. Generator's Certification

I hereby certify that all information submitted in this and attached documents is correct to the best of my knowledge. I also certify that any samples submitted are representative of the actual waste. If U.E.S., LLC discovers a descrepancy during the approval process, Generator grants U.E.S., LLC or it's authorized third party facilities, the authority to amend the profile, as U.E.S., LLC deems necessary, to reflect the descrepancy.

_____ _____ _____

N. Reserved for Facility Use

1. Date Approved _____ Approver's Initials _____

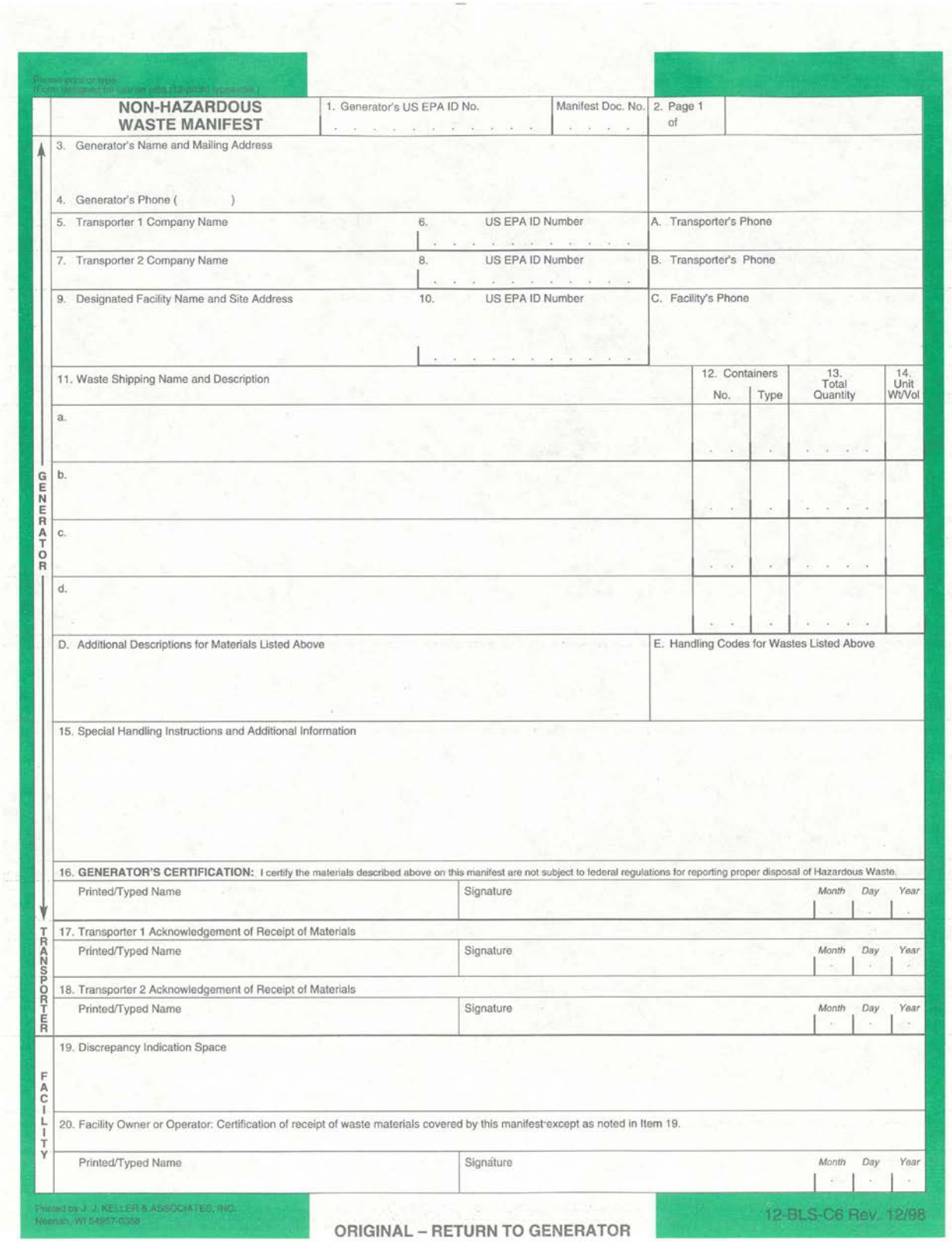
2. Sample

_____	MSDS Attached	_____	Incineration	_____	Pricing
_____	Analytical Attached	_____	WWT		
_____	Landfill			_____	Freight

Outbound _____

Form GTS87903

6.2.2 Uniform Non-hazardous Waste Manifest:



NON-HAZARDOUS WASTE MANIFEST

1. Generator's US EPA ID No.
Manifest Doc. No.
2. Page 1 of

GENERATOR

3. Generator's Name and Mailing Address

4. Generator's Phone ( )

5. Transporter 1 Company Name
6. US EPA ID Number
A. Transporter's Phone

7. Transporter 2 Company Name
8. US EPA ID Number
B. Transporter's Phone

9. Designated Facility Name and Site Address
10. US EPA ID Number
C. Facility's Phone

11. Waste Shipping Name and Description	12. Containers No.	12. Containers Type	13. Total Quantity	14. Unit Wt/Vol
a.				
b.				
c.				
d.				

D. Additional Descriptions for Materials Listed Above

E. Handling Codes for Wastes Listed Above

15. Special Handling Instructions and Additional Information

16. **GENERATOR'S CERTIFICATION:** I certify the materials described above on this manifest are not subject to federal regulations for reporting proper disposal of Hazardous Waste.

Printed/Typed Name | Signature | Month | Day | Year

TRANSPORTER

17. Transporter 1 Acknowledgement of Receipt of Materials

Printed/Typed Name | Signature | Month | Day | Year

18. Transporter 2 Acknowledgement of Receipt of Materials

Printed/Typed Name | Signature | Month | Day | Year

FACILITY

19. Discrepancy Indication Space

20. Facility Owner or Operator: Certification of receipt of waste materials covered by this manifest except as noted in Item 19.

Printed/Typed Name | Signature | Month | Day | Year

Printed by J. J. KELLER & ASSOCIATES, INC.
Neenah, WI 54957-0368

ORIGINAL – RETURN TO GENERATOR

12-BLS-C6 Rev. 12/98

6.3 Sludge Analytical Results

Ed Kinley
Universal Environmental Solutions
PO Box 76105
Tampa, FL 33675

September 29, 2014

SunLabs Project Number: **4090807**
Client Project Description: **Plant Sludge Box**

Dear Mr. Kinley,

Enclosed is the report of laboratory analysis for the following samples:

Sample Number	Sample Description	Date Collected	Date Received
4090807-01	Roll-off/Sludge Box	09/08/14 11:30	09/08/14 16:50

Narrative

Unless otherwise noted below or in the report and where applicable:

- Samples were received at the proper temperature and analyzed as received.
- Sample condition upon receipt is reported on the chain-of-custody attached to this report.
- Results for all solid matrices are reported on a dry weight basis.
- Appropriate calibration and QC criteria were satisfactorily met.
- All applicable holding times for analytes have been met.
- Copies of the chains-of-custody, if received, are attached to this report.

Sample 4090807-01 was leached for TCLP on 09/09/14 at 1600. The TCLP Leachate was created 09/10/14 at 1000.

QC Batch B006902 had an exception for Mercury on the MS and RPD. The LCS and LCSD were acceptable, so the out of control was attributed to matrix.

QC Batch B006921 had exceptions for VOC's on the MS. The LCS and LCSD were acceptable, so the out of control was attributed to matrix.

QC Batch B006957 had an exception for Hexachlorobenzene and Pyridine on the LCS/LCSD RPD. All samples were non-detect for these analytes.

Sample 4090807-01 was leached for TCLP on 09/24/14 at 1556. The TCLP Leachate was created 09/25/14 at 0913.

If you have any questions or comments concerning this report, please do not hesitate to contact us.

Michael W. Palmer
Vice President, Laboratory Operations

Unless Otherwise Noted and Where Applicable:
The result herein relate only to the items tested or to the samples as received by the laboratory. This report shall not be reproduced except in full, without the written approval of SunLabs. All samples will be disposed of within 60 days of the date of receipt of the samples. All results meet the requirements of the NELAC standards. Uncertainty values are available upon request.

Report of Laboratory Analysis

SunLabs Project Number	Universal Environmental Solutions
4090807	Project Description: Plant Sludge Box

September 29, 2014

SunLabs Sample Number: **4090807-01**
Sample Designation: **Roll-off/Sludge Box**

Matrix: **Sludge**
Date Collected: **09/08/14 11:30**
Date Received: **09/08/14 16:50**

Parameters	Method	Units	Results		Dil Factor	MDL	PQL	CAS Number	Date/Time Analyzed	Date/Time Prep
Mercury by EPA 7470				Method Qualifier:						
Mercury	EPA 7470	ug/L	0.96		1	0.14	0.58	7439-97-6	09/11/14 18:15	09/10/14 11:00
RCRA7 Metals by EPA 6010				Method Qualifier:						
Arsenic	EPA 6010	ug/L	72	I	1	25	100	7440-38-2	09/11/14 15:34	09/10/14 11:22
Barium	EPA 6010	ug/L	2100		1	2.6	10	7440-39-3	09/11/14 15:34	09/10/14 11:22
Cadmium	EPA 6010	ug/L	14	I	1	4.6	18	7440-43-9	09/11/14 15:34	09/10/14 11:22
Chromium	EPA 6010	ug/L	230		1	10	40	7440-47-3	09/11/14 15:34	09/10/14 11:22
Lead	EPA 6010	ug/L	310		1	24	95	7439-92-1	09/11/14 15:34	09/10/14 11:22
Selenium	EPA 6010	ug/L	22	U	1	22	90	7782-49-2	09/11/14 15:34	09/10/14 11:22
Silver	EPA 6010	ug/L	10	U	1	10	41	7440-22-4	09/11/14 15:34	09/10/14 11:22
TCLP Metals by EPA 6010				Method Qualifier:						
Barium	EPA 6010	mg/L	0.070	I	1	0.0010	0.10	7440-39-3	09/26/14 19:14	09/25/14 12:41
Chromium	EPA 6010	mg/L	0.0035	U	1	0.0035	0.10	7440-47-3	09/26/14 19:14	09/25/14 12:41
Lead	EPA 6010	mg/L	0.0044	U	1	0.0044	0.10	7439-92-1	09/26/14 19:14	09/25/14 12:41
TCLP Semivolatiles by EPA 8270				Method Qualifier:						
Surrogate: 2-Fluorophenol (0-58)	EPA 8270	%	31.0		1			367-12-4	09/18/14 19:08	09/11/14 17:16
Surrogate: Phenol-d6 (0-38)	EPA 8270	%	22.7		1			13127-88-3	09/18/14 19:08	09/11/14 17:16
Surrogate: Nitrobenzene-d5 (0-118)	EPA 8270	%	68.7		1			4165-60-0	09/18/14 19:08	09/11/14 17:16
Surrogate: 2-Fluorobiphenyl (0-115)	EPA 8270	%	65.9		1			321-60-8	09/18/14 19:08	09/11/14 17:16
Surrogate: 2,4,6-Tribromophenol (0-144)	EPA 8270	%	77.7		1			118-79-6	09/18/14 19:08	09/11/14 17:16
Surrogate: p-Terphenyl-d14 (1-148)	EPA 8270	%	75.5		1			1718-51-0	09/18/14 19:08	09/11/14 17:16
1,4-Dichlorobenzene	EPA 8270	mg/L	0.0050	U	1	0.0012	0.0050	106-46-7	09/18/14 19:08	09/11/14 17:16
2,4,5-Trichlorophenol	EPA 8270	mg/L	0.0050	U	1	0.00065	0.0050	95-95-4	09/18/14 19:08	09/11/14 17:16
2,4,6-Trichlorophenol	EPA 8270	mg/L	0.0050	U	1	0.00073	0.0050	88-06-2	09/18/14 19:08	09/11/14 17:16
2,4-Dinitrotoluene	EPA 8270	mg/L	0.0050	U	1	0.0041	0.0050	121-14-2	09/18/14 19:08	09/11/14 17:16
Hexachlorobenzene	EPA 8270	mg/L	0.0050	U	1	0.00063	0.0050	118-74-1	09/18/14 19:08	09/11/14 17:16
Hexachlorobutadiene	EPA 8270	mg/L	0.0050	U	1	0.00061	0.0050	87-68-3	09/18/14 19:08	09/11/14 17:16
Hexachloroethane	EPA 8270	mg/L	0.0050	U	1	0.00092	0.0050	67-72-1	09/18/14 19:08	09/11/14 17:16
m&p-cresol	EPA 8270	mg/L	0.0050	U	1	0.00077	0.0050		09/18/14 19:08	09/11/14 17:16
Nitrobenzene	EPA 8270	mg/L	0.0050	U	1	0.00073	0.0050	98-95-3	09/18/14 19:08	09/11/14 17:16
o-cresol	EPA 8270	mg/L	0.0050	U	1	0.00064	0.0050	95-48-7	09/18/14 19:08	09/11/14 17:16
Pentachlorophenol	EPA 8270	mg/L	0.020	U	1	0.00067	0.020	87-86-5	09/18/14 19:08	09/11/14 17:16
Pyridine	EPA 8270	mg/L	0.020	U	1	0.0023	0.020	110-86-1	09/18/14 19:08	09/11/14 17:16

SunLabs, Inc
5460 Beaumont Center Blvd., Suite 520
Tampa, FL 33634

Laboratory ID Number E84809

Phone: (813) 881-9401
Email: Info@SunLabsInc.com
Website: www.SunLabsInc.com

Report of Laboratory Analysis

SunLabs Project Number	Universal Environmental Solutions
4090807	Project Description: Plant Sludge Box

September 29, 2014

SunLabs Sample Number: **4090807-01**
Sample Designation: **Roll-off/Sludge Box**

Matrix: **Sludge**
Date Collected: **09/08/14 11:30**
Date Received: **09/08/14 16:50**

Parameters	Method	Units	Results	Dil Factor	MDL	PQL	CAS Number	Date/Time Analyzed	Date/Time Prep
TCLP Volatiles by EPA 8260				Method Qualifier:					
Surrogate: 4-Bromofluorobenzene (82-118)	EPA 8260	%	96.9	1			460-00-4	09/11/14 13:19	09/11/14 08:00
Surrogate: Dibromofluoromethane (85-120)	EPA 8260	%	109	1			1868-53-7	09/11/14 13:19	09/11/14 08:00
Surrogate: Toluene-d8 (83-115)	EPA 8260	%	100	1			2037-26-5	09/11/14 13:19	09/11/14 08:00
Benzene	EPA 8260	mg/L	0.092 U	100	0.023	0.092	71-43-2	09/11/14 13:19	09/11/14 08:00
2-Butanone (MEK)	EPA 8260	mg/L	0.84 U	100	0.21	0.84	78-93-3	09/11/14 13:19	09/11/14 08:00
Carbon tetrachloride	EPA 8260	mg/L	0.072 U	100	0.018	0.072	56-23-5	09/11/14 13:19	09/11/14 08:00
Chlorobenzene	EPA 8260	mg/L	0.076 U	100	0.019	0.076	108-90-7	09/11/14 13:19	09/11/14 08:00
Chloroform	EPA 8260	mg/L	0.074 U	100	0.019	0.074	67-66-3	09/11/14 13:19	09/11/14 08:00
1,1-Dichloroethene	EPA 8260	mg/L	0.13 U	100	0.034	0.13	75-35-4	09/11/14 13:19	09/11/14 08:00
1,2-Dichloroethane	EPA 8260	mg/L	0.097 U	100	0.024	0.097	107-06-2	09/11/14 13:19	09/11/14 08:00
1,4-Dichlorobenzene	EPA 8260	mg/L	0.084 U	100	0.021	0.084	106-46-7	09/11/14 13:19	09/11/14 08:00
Tetrachloroethene	EPA 8260	mg/L	0.14 U	100	0.036	0.14	127-18-4	09/11/14 13:19	09/11/14 08:00
Trichloroethene	EPA 8260	mg/L	0.19 U	100	0.048	0.19	79-01-6	09/11/14 13:19	09/11/14 08:00
Vinyl chloride	EPA 8260	mg/L	0.10 U	100	0.025	0.10	75-01-4	09/11/14 13:19	09/11/14 08:00

Footnotes

U	*The compound was analyzed for but not detected.*
J	*The reported value failed to meet the established quality control criteria for either precision or accuracy (see cover letter for explanation)*
I	*The reported value is between the laboratory method detection limit and the laboratory practical quantitation limit.*
***	*SunLabs is not currently NELAC certified for this analyte. Unless directed otherwise by client, a NELAC certified sub-contract laboratory has performed this analysis (see cover letter for details).*
LCS / LCSD	*Laboratory Control Sample / Laboratory Control Sample Duplicate*
MB	*Method Blank*
MS / MSD	*Matrix Spike / Matrix Spike Duplicate*
RPD	*Relative Percent Difference*

SunLabs, Inc
5460 Beaumont Center Blvd., Suite 520
Tampa, FL 33634

Laboratory ID Number E84809

Phone: (813) 881-9401
Email: Info@SunLabsInc.com
Website: www.SunLabsInc.com

Quality Control Data

SunLabs Project Number	Universal Environmental Solutions
4090807	Project Description: Plant Sludge Box

Batch No: **B006901**
Test: **RCRA7 6010**

Analyte	Result	Units	Spike Level	Parent Result	%REC	%REC Limits	RPD	RPD Limit	Flags
Blank (B006901-BLK1)			Prepared: 09/10/14 Analyzed: 09/11/14						
Arsenic	5.0 U	ug/L							
Barium	0.52 U	ug/L							
Cadmium	0.93 U	ug/L							
Chromium	2.0 U	ug/L							
Lead	4.7 U	ug/L							
Selenium	4.4 U	ug/L							
Silver	2.1 U	ug/L							
LCS (B006901-BS1)			Prepared: 09/10/14 Analyzed: 09/11/14						
Arsenic	950	ug/L	990		96.0	80-120			
Barium	940	ug/L	990		95.1	80-120			
Cadmium	910	ug/L	990		92.1	80-120			
Chromium	880	ug/L	990		88.5	80-120			
Lead	900	ug/L	990		91.2	80-120			
Selenium	940	ug/L	990		95.3	80-120			
Silver	890	ug/L	990		90.2	80-120			
LCS Dup (B006901-BSD1)			Prepared: 09/10/14 Analyzed: 09/11/14						
Arsenic	890	ug/L	990		89.8	80-120	6.75	20	
Barium	920	ug/L	990		92.7	80-120	2.56	20	
Cadmium	870	ug/L	990		88.0	80-120	4.58	20	
Chromium	830	ug/L	990		84.3	80-120	4.91	20	
Lead	890	ug/L	990		89.8	80-120	1.52	20	
Selenium	910	ug/L	990		91.9	80-120	3.59	20	
Silver	860	ug/L	990		86.6	80-120	4.11	20	
Matrix Spike (B006901-MS1)	**Parent Sample: 4090807-01**		Prepared: 09/10/14 Analyzed: 09/11/14						
Arsenic	4200	ug/L	5000	72	83.0	75-125			
Barium	6300	ug/L	5000	2100	85.7	75-125			
Cadmium	4200	ug/L	5000	14	83.6	75-125			
Chromium	4100	ug/L	5000	230	77.8	75-125			
Lead	4300	ug/L	5000	310	81.4	75-125			
Selenium	4300	ug/L	5000	ND	87.7	75-125			
Silver	3900	ug/L	5000	ND	78.2	75-125			
Matrix Spike Dup (B006901-MSD1)	**Parent Sample: 4090807-01**		Prepared: 09/10/14 Analyzed: 09/11/14						
Arsenic	4200	ug/L	5000	72	84.3	75-125	1.48	20	
Barium	6300	ug/L	5000	2100	85.0	75-125	0.567	20	
Cadmium	4100	ug/L	5000	14	82.9	75-125	0.873	20	
Chromium	4100	ug/L	5000	230	77.4	75-125	0.560	20	
Lead	4200	ug/L	5000	310	78.4	75-125	3.41	20	
Selenium	4400	ug/L	5000	ND	89.1	75-125	1.65	20	
Silver	3900	ug/L	5000	ND	78.5	75-125	0.488	20	

SunLabs, Inc
5460 Beaumont Center Blvd., Suite 520
Tampa, FL 33634

Laboratory ID Number E84809

Phone: (813) 881-9401
Email: Info@SunLabsInc.com
Website: www.SunLabsInc.com

Quality Control Data

SunLabs Project Number	Universal Environmental Solutions
4090807	Project Description: Plant Sludge Box

Batch No: B006902
Test: **Mercury-W 7470**

Analyte	Result	Units	Spike Level	Parent Result	%REC	%REC Limits	RPD	RPD Limit	Flags
Blank (B006902-BLK1)			Prepared: 09/10/14 Analyzed: 09/11/14						
Mercury	0.018 U	ug/L							
LCS (B006902-BS1)			Prepared: 09/10/14 Analyzed: 09/11/14						
Mercury	4.5	ug/L	5.0		90.8	80-120			
LCS Dup (B006902-BSD1)			Prepared: 09/10/14 Analyzed: 09/11/14						
Mercury	4.6	ug/L	5.0		92.4	80-120	1.73	20	
Matrix Spike (B006902-MS1)	**Parent Sample: 4090807-01**		Prepared: 09/10/14 Analyzed: 09/11/14						
Mercury	20	ug/L	40	0.96	46.7	75-125			J
Matrix Spike Dup (B006902-MSD1)	**Parent Sample: 4090807-01**		Prepared: 09/10/14 Analyzed: 09/11/14						
Mercury	32	ug/L	40	0.96	76.4	75-125	46.3	20	J

Batch No: B006921
Test: **TCLP VOC 8260**

Analyte	Result	Units	Spike Level	Parent Result	%REC	%REC Limits	RPD	RPD Limit	Flags
Blank (B006921-BLK1)			Prepared & Analyzed: 09/11/14						
Surrogate: 4-Bromofluorobenzene	48	ug/L	50		95.8	82-118			
Surrogate: Dibromofluoromethane	52	ug/L	50		103	85-120			
Surrogate: Toluene-d8	50	ug/L	50		101	83-115			
Benzene	0.00023 U	mg/L							
2-Butanone (MEK)	0.0021 U	mg/L							
Carbon tetrachloride	0.00018 U	mg/L							
Chlorobenzene	0.00019 U	mg/L							
Chloroform	0.00019 U	mg/L							
1,1-Dichloroethene	0.00034 U	mg/L							
1,2-Dichloroethane	0.00024 U	mg/L							
1,4-Dichlorobenzene	0.00021 U	mg/L							
Tetrachloroethene	0.00036 U	mg/L							
Trichloroethene	0.00048 U	mg/L							
Vinyl chloride	0.00025 U	mg/L							
LCS (B006921-BS1)			Prepared & Analyzed: 09/11/14						
Surrogate: 4-Bromofluorobenzene	50	ug/L	50		99.1	82-118			
Surrogate: Dibromofluoromethane	52	ug/L	50		104	85-120			
Surrogate: Toluene-d8	50	ug/L	50		99.2	83-115			
Benzene	0.022	mg/L	0.020		112	80-120			
2-Butanone (MEK)	0.22	mg/L	0.20		109	53-130			
Carbon tetrachloride	0.019	mg/L	0.020		97.3	75-120			
Chlorobenzene	0.021	mg/L	0.020		103	80-120			
Chloroform	0.022	mg/L	0.020		109	80-120			
1,1-Dichloroethene	0.020	mg/L	0.020		101	80-120			
1,2-Dichloroethane	0.021	mg/L	0.020		106	80-120			
1,4-Dichlorobenzene	0.022	mg/L	0.020		111	69-135			
Tetrachloroethene	0.021	mg/L	0.020		104	80-120			
Trichloroethene	0.021	mg/L	0.020		105	80-112			
Vinyl chloride	0.019	mg/L	0.020		93.6	78-131			

SunLabs, Inc
5460 Beaumont Center Blvd., Suite 520
Tampa, FL 33634

Phone: (813) 881-9401
Email: Info@SunLabsInc.com
Website: www.SunLabsInc.com

Quality Control Data

SunLabs Project Number	Universal Environmental Solutions
4090807	Project Description: Plant Sludge Box

Batch No: **B006921**
Test: **TCLP VOC 8260**

Analyte	Result	Units	Spike Level	Parent Result	%REC	%REC Limits	RPD	RPD Limit	Flags
LCS Dup (B006921-BSD1)			Prepared & Analyzed: 09/11/14						
Surrogate: 4-Bromofluorobenzene	50	ug/L	50		99.1	82-118			
Surrogate: Dibromofluoromethane	51	ug/L	50		103	85-120			
Surrogate: Toluene-d8	50	ug/L	50		100	83-115			
Benzene	0.022	mg/L	0.020		112	80-120	0.223	20	
2-Butanone (MEK)	0.21	mg/L	0.20		103	53-130	5.83	20	
Carbon tetrachloride	0.020	mg/L	0.020		97.6	75-120	0.308	20	
Chlorobenzene	0.021	mg/L	0.020		104	80-120	1.11	20	
Chloroform	0.022	mg/L	0.020		109	80-120	0.0920	20	
1,1-Dichloroethene	0.020	mg/L	0.020		100	80-120	0.645	20	
1,2-Dichloroethane	0.021	mg/L	0.020		103	80-120	2.87	20	
1,4-Dichlorobenzene	0.022	mg/L	0.020		110	69-135	0.271	20	
Tetrachloroethene	0.021	mg/L	0.020		104	80-120	0.865	20	
Trichloroethene	0.021	mg/L	0.020		104	80-112	0.911	20	
Vinyl chloride	0.018	mg/L	0.020		89.8	78-131	4.09	20	
Matrix Spike (B006921-MS1)	**Parent Sample: 4090807-01**		Prepared & Analyzed: 09/11/14						
Surrogate: 4-Bromofluorobenzene	49	ug/L	50		98.9	82-118			
Surrogate: Dibromofluoromethane	57	ug/L	50		114	85-120			
Surrogate: Toluene-d8	51	ug/L	50		102	83-115			
Benzene	0.028	mg/L	0.020	ND	140	45-149			
2-Butanone (MEK)	0.26	mg/L	0.20	ND	129	55-143			
Carbon tetrachloride	0.023	mg/L	0.020	ND	116	70-120			
Chlorobenzene	0.022	mg/L	0.020	ND	108	73-120			
Chloroform	0.027	mg/L	0.020	ND	136	77-122			J
1,1-Dichloroethene	0.026	mg/L	0.020	ND	131	63-126			J
1,2-Dichloroethane	0.026	mg/L	0.020	ND	128	81-122			J
1,4-Dichlorobenzene	0.021	mg/L	0.020	ND	106	68-135			
Tetrachloroethene	0.020	mg/L	0.020	ND	98.8	57-141			
Trichloroethene	0.022	mg/L	0.020	ND	112	66-124			
Vinyl chloride	0.022	mg/L	0.020	ND	112	71-142			

Quality Control Data

SunLabs Project Number	Universal Environmental Solutions
4090807	Project Description: Plant Sludge Box

Batch No: **B006957**
Test: **TCLP SVOC 8270**

Analyte	Result	Units	Spike Level	Parent Result	%REC	%REC Limits	RPD	RPD Limit	Flags
Blank (B006957-BLK1)			Prepared: 09/11/14 Analyzed: 09/18/14						
Surrogate: 2-Fluorophenol	0.34	mg/L	1.0		33.9	0-58			
Surrogate: Phenol-d6	0.22	mg/L	1.0		21.8	0-38			
Surrogate: Nitrobenzene-d5	0.75	mg/L	1.0		75.3	0-118			
Surrogate: 2-Fluorobiphenyl	0.72	mg/L	1.0		72.2	0-115			
Surrogate: 2,4,6-Tribromophenol	0.79	mg/L	1.0		78.8	0-144			
Surrogate: p-Terphenyl-d14	1.0	mg/L	1.0		105	1-148			
1,4-Dichlorobenzene	0.0012 U	mg/L							
2,4,5-Trichlorophenol	0.00065 U	mg/L							
2,4,6-Trichlorophenol	0.00073 U	mg/L							
2,4-Dinitrotoluene	0.0041 U	mg/L							
Hexachlorobenzene	0.00063 U	mg/L							
Hexachlorobutadiene	0.00061 U	mg/L							
Hexachloroethane	0.00092 U	mg/L							
m&p-cresol	0.00077 U	mg/L							
Nitrobenzene	0.00073 U	mg/L							
o-cresol	0.00064 U	mg/L							
Pentachlorophenol	0.00067 U	mg/L							
Pyridine	0.0023 U	mg/L							
LCS (B006957-BS1)			Prepared: 09/11/14 Analyzed: 09/18/14						
Surrogate: 2-Fluorophenol	0.32	mg/L	1.0		32.2	0-58			
Surrogate: Phenol-d6	0.24	mg/L	1.0		23.8	0-38			
Surrogate: Nitrobenzene-d5	0.74	mg/L	1.0		74.0	0-118			
Surrogate: 2-Fluorobiphenyl	0.82	mg/L	1.0		81.6	0-115			
Surrogate: 2,4,6-Tribromophenol	0.81	mg/L	1.0		81.4	0-144			
Surrogate: p-Terphenyl-d14	0.97	mg/L	1.0		96.9	1-148			
1,4-Dichlorobenzene	0.24	mg/L	0.50		48.4	10-88			
2,4,5-Trichlorophenol	0.44	mg/L	0.50		87.7	47-113			
2,4,6-Trichlorophenol	0.44	mg/L	0.50		88.5	54-102			
2,4-Dinitrotoluene	0.50	mg/L	0.50		100	51-119			
Hexachlorobenzene	0.25	mg/L	0.50		49.7	47-114			
Hexachlorobutadiene	0.25	mg/L	0.50		49.2	11-85			
Hexachloroethane	0.25	mg/L	0.50		49.7	6-87			
m&p-cresol	0.48	mg/L				4-116			
Nitrobenzene	0.40	mg/L	0.50		80.2	48-101			
o-cresol	0.21	mg/L	0.50		42.1	22-78			
Pentachlorophenol	0.61	mg/L	0.50		123	22-133			
Pyridine	0.11	mg/L	0.50		22.1	20-120			
LCS Dup (B006957-BSD1)			Prepared: 09/11/14 Analyzed: 09/18/14						
Surrogate: 2-Fluorophenol	0.38	mg/L	1.0		37.7	0-58			
Surrogate: Phenol-d6	0.26	mg/L	1.0		25.9	0-38			
Surrogate: Nitrobenzene-d5	0.80	mg/L	1.0		79.8	0-118			
Surrogate: 2-Fluorobiphenyl	0.68	mg/L	1.0		68.0	0-115			
Surrogate: 2,4,6-Tribromophenol	0.78	mg/L	1.0		78.1	0-144			
Surrogate: p-Terphenyl-d14	1.0	mg/L	1.0		99.9	1-148			
1,4-Dichlorobenzene	0.23	mg/L	0.50		45.3	10-88	6.61	20	
2,4,5-Trichlorophenol	0.43	mg/L	0.50		85.3	47-113	2.75	20	
2,4,6-Trichlorophenol	0.43	mg/L	0.50		85.3	54-102	3.68	20	
2,4-Dinitrotoluene	0.49	mg/L	0.50		98.5	51-119	1.55	20	
Hexachlorobenzene	0.44	mg/L	0.50		87.1	47-114	54.7	20	J

Quality Control Data

SunLabs Project Number	Universal Environmental Solutions
4090807	Project Description: Plant Sludge Box

Batch No: **B006957**
Test: **TCLP SVOC 8270**

Analyte	Result	Units	Spike Level	Parent Result	%REC	%REC Limits	RPD	RPD Limit	Flags
LCS Dup (B006957-BSD1)			Prepared: 09/11/14 Analyzed: 09/18/14						
Hexachlorobutadiene	0.22	mg/L	0.50		44.8	11-85	9.28	20	
Hexachloroethane	0.24	mg/L	0.50		48.3	6-87	2.90	20	
m&p-cresol	0.53	mg/L				4-116	10.2	20	
Nitrobenzene	0.42	mg/L	0.50		83.8	48-101	4.39	20	
o-cresol	0.24	mg/L	0.50		48.5	22-78	14.1	20	
Pentachlorophenol	0.54	mg/L	0.50		109	22-133	12.3	20	
Pyridine	0.14	mg/L	0.50		27.5	20-120	21.7	20	J
Matrix Spike (B006957-MS1)	**Parent Sample: 4090807-01**		Prepared: 09/11/14 Analyzed: 09/18/14						
Surrogate: 2-Fluorophenol	0.33	mg/L	1.0		33.5	0-58			
Surrogate: Phenol-d6	0.26	mg/L	1.0		25.6	0-38			
Surrogate: Nitrobenzene-d5	0.75	mg/L	1.0		74.6	0-118			
Surrogate: 2-Fluorobiphenyl	0.83	mg/L	1.0		82.7	0-115			
Surrogate: 2,4,6-Tribromophenol	0.74	mg/L	1.0		74.4	0-144			
Surrogate: p-Terphenyl-d14	0.70	mg/L	1.0		70.0	1-148			
1,4-Dichlorobenzene	0.25	mg/L	0.50	ND	49.4	9-78			
2,4,5-Trichlorophenol	0.46	mg/L	0.50	ND	91.3	28-124			
2,4,6-Trichlorophenol	0.42	mg/L	0.50	ND	83.2	33-112			
2,4-Dinitrotoluene	0.50	mg/L	0.50	ND	99.5	40-119			
Hexachlorobenzene	0.41	mg/L	0.50	ND	81.6	31-119			
Hexachlorobutadiene	0.22	mg/L	0.50	ND	44.7	5-75			
Hexachloroethane	0.27	mg/L	0.50	ND	53.3	0-96			
m&p-cresol	0.41	mg/L		ND		2-118			
Nitrobenzene	0.41	mg/L	0.50	ND	81.7	30-103			
o-cresol	0.13	mg/L	0.50	ND	25.0	16-69			
Pentachlorophenol	0.60	mg/L	0.50	ND	120	17-150			
Pyridine	0.11	mg/L	0.50	ND	22.0	20-150			

Quality Control Data

SunLabs Project Number	Universal Environmental Solutions
4090807	Project Description: Plant Sludge Box

Batch No: **B007169**
Test: **TCLP RCRA7**

Analyte	Result	Units	Spike Level	Parent Result	%REC	%REC Limits	RPD	RPD Limit	Flags
Blank (B007169-BLK1)			Prepared: 09/25/14 Analyzed: 09/26/14						
Barium	0.0010 U	mg/L							
Chromium	0.0035 U	mg/L							
Lead	0.0044 U	mg/L							
LCS (B007169-BS1)			Prepared: 09/25/14 Analyzed: 09/26/14						
Barium	4.6	mg/L	5.0		92.0	80-120			
Chromium	4.4	mg/L	5.0		89.2	80-120			
Lead	4.3	mg/L	5.0		87.3	80-120			
LCS Dup (B007169-BSD1)			Prepared: 09/25/14 Analyzed: 09/26/14						
Barium	4.5	mg/L	5.0		91.2	80-120	0.881	20	
Chromium	4.5	mg/L	5.0		90.9	80-120	1.92	20	
Lead	4.4	mg/L	5.0		88.3	80-120	1.11	20	
Matrix Spike (B007169-MS1)	**Parent Sample: 4090807-01**		Prepared: 09/25/14 Analyzed: 09/26/14						
Barium	4.5	mg/L	5.0	0.070	90.1	80-120			
Chromium	4.5	mg/L	5.0	ND	90.8	80-120			
Lead	4.2	mg/L	5.0	ND	85.8	80-120			

Samples Associated with QC Batches

QC Batch ID	Method	Sample List
B006894	EPA 1311	4090807-01
B006895	EPA 1311	4090807-01
B006901	EPA 6010	4090807-01
B006902	EPA 7470	4090807-01
B006921	EPA 8260	4090807-01
B006957	EPA 8270	4090807-01
B007151	EPA 1311	4090807-01RE1
B007169	EPA 6010	4090807-01

SunLabs, Inc
5460 Beaumont Center Blvd., Suite 520
Tampa, FL 33634

Phone: (813) 881-9401
Email: Info@SunLabsInc.com
Website: www.SunLabsInc.com

SunLabs, Inc. Chain of Custody — Plant Sludge Box — No. 38170

Client Name: UNIV. ENV. Solutions (U.E.S.)
Contact: ED KINLEY
Address:
Phone / Fax: 813-990-0659
E-Mail:

SunLabs Project #: 4090807 — Project Name: Plant Sludge Box — Project #: RAS 09814
PO #:
AR Bill To:

Due Date Requested*:

SunLabs Sample #	Sample Description	Sampled: Date	Sampled: Time	# of Bottles	Bottle Type	Preservative	Matrix	Analysis / Method Requested
01	Roll-off/Sludge Box	9/8/14	11:30	3	GA	I	WW	TCLP RCRA 8 Volatiles SemiVols

FDEP PreApproval site
ADaPT EDD (PGM:_____)

Facility/Site ID:

Remarks / Comments:
Waste Liquid/Sludge Solids
TCLP VOCs
TCLP SVOCs
Total RCRA8 per Ed
$400 TCLP Ba, Cr, Pb

Length of Record Retention if other than 5 years:*

Sampler Signature / Date: 9/8/14

Printed Name / Affiliation: Brad Schrader / UES Supervisor

Bottle Type Codes: GV = Glass Vial; GVS = Low Level Volatile Kit; GA = Glass Amber; T = Tedlar Bag; P = Plastic; O = Other (Specify); S = Soil Jar

Preservative Codes: H = Hydrochloric Acid + Ice; I = Ice only; N = Nitric Acid; B = Sodium bisulfate + Ice; S = Sulfuric Acid + Ice; VS = NaHSO4, MeOH, + Ice; T = Sodium thiosulfate + ice; O = Other (Specify)

Matrix Codes: SO = Soil; SOL = Solid; A = Air; SW = Surface Water; DW = Drinking Water; WS = Waste; WW = Waste Water; GW = Ground Water; W = Water (Blanks); SE = Sediment; O = Other (Specify) Sludge

Internal Use Only — Sample Condition Upon Receipt: Custody Seals present? Y / N / NA; Custody Seals intact? Y / N / NA; Shipping Bills attached? Y / N / NA; Sample containers intact? Y / N / NA; Samples within holding times? Y / N / NA; Sufficient volume for all analyses? Y / N / NA; Are vials head-space free? Y / N / NA; Proper containers and preservatives? Y / N / NA

Temp upon receipt: 12.1 °C
Received on Ice? (Y) / N / NA
Some days

SUNLABS, INC. RESERVES THE RIGHT TO BILL FOR DISPOSAL OF UNUSED/UNRETURNED SAMPLES AND TO RETURN UNUSED SAMPLES.

Relinquished By:	Relinquished To:	Date:	Time:
Brad Schrader	E. Kinley	9/8/14	13:00
E. Kinley	Phillip Allen	9/8/14	16:56

SunLabs, Inc.
5460 Beaumont Center Blvd., Suite 520, Tampa, Florida 33634
Phone: 813-881-9401 / Fax: 813-354-4661
e-mail: info@SunLabsInc.com www.SunLabsInc.com

Rev 11/11

* See General Terms and Conditions on Reverse

ATTACHMENT 7 – SWPPP

UES is submitting a No Exposure Certification for Exclusion from NEPDES Stormwater Permitting form 62-620.910(17) request. The request is attached below and will be submitted to the FDEP no later than 10/30/14.

Exemption status is based on the facility policy of zero discharge of rainwater on the tank containment pad and no exposure routes for impacted stormwater to navigable waters as detailed in 40 CFR 122 and 62-762 FAC. A copy of the NEC is attached below as well as a Site Map showing the stormwater drainage patterns.

UNIVERSAL ENVIRONMENTAL SOLUTIONS

Letter of Transmittal

To:	Stormwater Div. Notices Center, MS #2510 FDEP 2600 Blairstone Road Tallahassee, FL 32399-2400	Date: File:	February 2, 2015 No Exposure Certification for Exclusion from NPDES Stormwater Permitting

Enclosed please find:
_X_herewith ___under separate cover: ___drawings ___descriptive literature ___letters

If all information listed is not received, please contact us immediately.

Quantity	Title	Comments
1 PDF (Electronic)	No Exposure Certification for Exclusion from NPDES Stormwater Permitting. Universal Environmental Solutions, LLC – DEP ID #FLR000199802	Y

*Comment letter code:
R-Reviewed **N**-Reviewed and Noted **I**-For your Information **Y**-For your approval

The attached No Exposure Certification for Exclusion from NPDES Stormwater Permitting (FORM 62-620.910(17), F.A.C.) is being submitted for your review and approval.

Regards,

Ed Kinley,
President

DISTRIBUTION:

Beheem Kothur (FDEP)
Elizabeth Knauss (FDEP)
Anthony Tripp (FDEP)
Bryan Baker (FDEP)
Keith Coats (P.E.)
Jim Seavy (Consultant)

P.O. Box 76105, Tampa, FL 33675 ~ Phone (813) 241-9206 ~ Fax (813) 241-9215

NO EXPOSURE CERTIFICATION FOR EXCLUSION FROM NPDES STORMWATER PERMITTING (FORM 62-620.910(17), F.A.C.)

Incorporated by reference in Rule 62-620.100(2)(o)1.b., F.A.C.

Submission of this No Exposure Certification and certification fee constitutes your affirmation that the entity identified in Section II does not require permit authorization for stormwater discharges associated with industrial activity pursuant to paragraph 62-620.100(2)(o), F.A.C., due to the existence of a condition of no exposure.

A condition of no exposure exists at an industrial facility when all industrial materials and activities are protected by a storm resistant shelter to prevent exposure to precipitation and/or runoff. Industrial materials or activities include, but are not limited to, material handling equipment or activities, industrial machinery, raw materials, intermediate products, by-products, final products or waste products. Material handling activities include the storage, loading and unloading, transportation or conveyance of any raw material, intermediate product, final product or waste product. A storm resistant shelter is not required for the following industrial materials and activities:

- drums, barrels, tanks and similar containers that are tightly sealed, provided those containers are not deteriorated and do not leak. "Sealed" means banded or otherwise secured and without operational taps or valves;
- adequately maintained vehicles used in material handling; and
- final products, other than products that would be mobilized in stormwater discharges (e.g., rock salt).

A No Exposure Certification must be provided for each facility qualifying for the no exposure exclusion. In addition, the exclusion from permitting is available on a facility-wide basis only and not for individual outfalls. If any industrial activities or materials are or will be exposed to precipitation, the facility is not eligible for the no exposure exclusion.

By signing and submitting this No Exposure Certification form, the entity in Section II is certifying that a condition of no exposure exists at its facility or site and is obligated to comply with the terms and conditions of 62-620.100(2)(o), F.A.C.

ALL INFORMATION MUST BE PROVIDED ON THIS FORM.

Detailed instructions for completing this form and obtaining the No Exposure exclusion are provided on pages 5-7.

I. IDENTIFICATION NUMBER:

Facility ID: FLR000199802

II. APPLICANT INFORMATION:

A. Operator Name: Ed Kinley		B. Operator Status: P
C. Address: 1650 Hemlock Street		
D. City: Tampa	E. State: FL	F. Zip Code: 33605
G. Responsible Authority: Ed Kinley		
H. Responsible Authority's Phone No.: (813) 241-9206 ext 183		

DEP Form 62-620.910(17)
Effective February 17, 2009

I. Responsible Authority's Fax No.:	(813) 241-9215
J. Responsible Authority's E-mail Address:	ekinley@uestampa.com

III. FACILITY/SITE LOCATION INFORMATION:

A. Facility Name:	Universal Environmental Solutions, LLC.		
B. Street Address:	1650 Hemlock Street		
C. City: Tampa		D. State: FL	E. Zip Code: 33605
F. County: Hillsborough	G. Latitude: N27° 56' 17"	Longitude: W82° 26' 28"	
H. Is the facility located on Indian Country Lands? ☐ Yes ☒ No		I. Water Management District: SWFWMD	
J. Facility Contact:	Ed Kinley		
K. Facility Contact's Phone No.:	(813) 241-9206 ext 183		
L. Facility Contact's Fax No.:	(813) 241-9215		
M. Facility Contact's E-mail Address:	ekinley@uestampa.com		

IV. FACILITY ACTIVITY INFORMATION:

A. SIC or Designated Activity Code(s):	Primary: 324191	Secondary: 562910
B. Total size of site associated with industrial activity: 1.29 acres		
C. Has a roof or pavement been installed over a formerly exposed pervious area in order to qualify for the no exposure exclusion? ☐ Yes ☒ No		
D. If yes, indicate approximately how much area was paved or roofed over. Completing this question does not disqualify the applicant from the no exposure exclusion.		
_____ Less than 1,000 square feet	_____ 1,000 square feet to one acre	_____ More than one acre

V. EXPOSURE CHECKLIST:

Are any of the following materials or activities exposed to precipitation, now or in the foreseeable future? (Please check either "Yes" or "No" in the appropriate box.) **If you answer "Yes" to any of these questions (1) through (11), you are <u>not</u> eligible for the no exposure exclusion.**	
1. Using, storing or cleaning industrial machinery or equipment and areas where residuals from using, storing or cleaning industrial machinery or equipment remain and are exposed to stormwater.	☐ Yes ☒ No
2. Materials or residuals on the ground or in stormwater inlets from spills/leaks.	☐ Yes ☒ No
3. Materials or products from past industrial activity.	☐ Yes ☒ No
4. Material handling equipment (except adequately maintained vehicles).	☐ Yes ☒ No
5. Materials or products during loading, unloading or transporting activities.	☐ Yes ☒ No
6. Materials or products stored outdoors [except final products intended for outside use (e.g., new cars) where exposure to storm water does not result in the discharge of pollutants].	☐ Yes ☒ No
7. Materials contained in open, deteriorated or leaking storage drums, barrels, tanks and similar containers.	☐ Yes ☒ No
8. Materials or products handled or stored on roads or railways owned or maintained by the discharger.	☐ Yes ☒ No
9. Waste material [except waste in covered, non-leaking containers (e.g., dumpsters)].	☐ Yes ☒ No
10. Application or disposal of process wastewater (unless otherwise permitted).	☐ Yes ☒ No
11. Particulate matter or visible deposits of residuals from roof stacks and/or vents not otherwise regulated (i.e., under an air quality control permit) and evident in the stormwater outflow.	☐ Yes ☒ No

VI. CERTIFICATION[1]:

I certify under penalty of law that I have read and understand the eligibility requirements as set out in 62-620.100(2)(o), F.A.C., and this form, for claiming a condition of "no exposure" and obtaining an exclusion from NPDES stormwater permitting.

I certify under penalty of law that there are no discharges of stormwater contaminated by exposure to industrial activities or materials from the industrial facility or site identified in this document [except as allowed under paragraph 62-620.100(2)(o)].

I understand that I am obligated to submit a no exposure certification form once every five years to the Department of Environmental Protection and to the operator of the local municipal separate storm sewer system (MS4) into which the facility discharges (where applicable). I understand that I must allow the Department of Environmental Protection, or MS4 operator where the discharge is into the local MS4, to perform inspections to confirm the condition of no exposure. I understand that I must obtain coverage under a permit authorized by 403.0885, F.S. prior to any point source discharge of stormwater associated with industrial activity from the facility or at any such time I anticipate that the conditions of no exposure shall no longer apply to the facility. I further understand that the Department may determine that stormwater discharge from the facility is the cause of, or contributes to, a violation of an applicable water quality standard, including designated use, and require that I obtain a permit for the discharge at which time I would no longer be eligible for the no exposure exclusion.

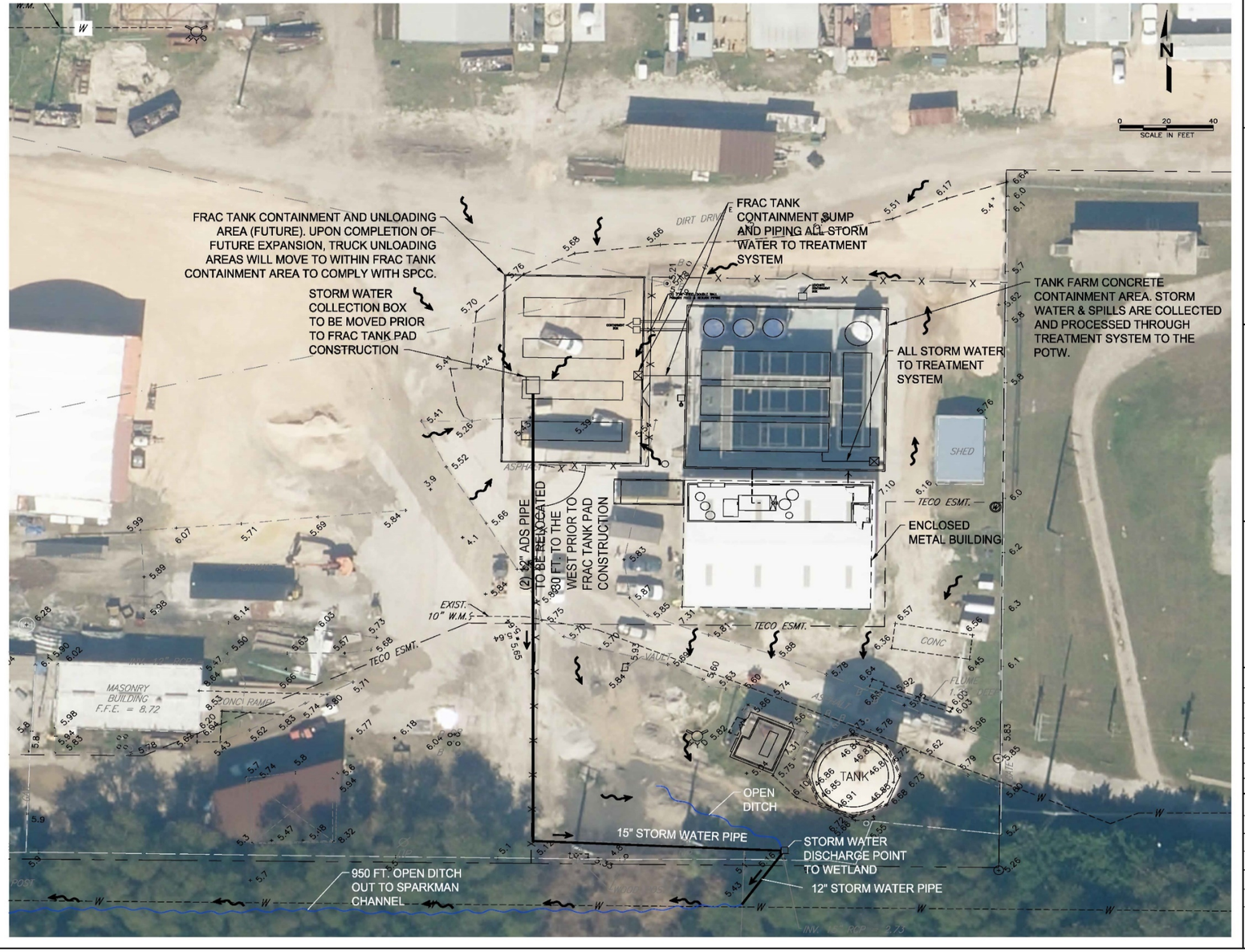
Additionally, I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gathered and evaluated the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is to the best of my knowledge and belief true, accurate and complete. **I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.**

Responsible Authority Name and Official Title (Type or Print):
ED KINLEY (President)

E. Kinley
Responsible Authority Signature:

10/16/2014
Date Signed:

[1] Signatory requirements are contained in Rule 62-620.305, F.A.C.



SEAVY & ASSOCIATES, INC.
2608 South 86th Street, Suite B
Tampa, FL 33619

DRAWING TITLE: STORM WATER FLOW MAP

PROJECT TITLE: INDUSTRIAL WASTEWATER PRE-TREATMENT PLANT

CLIENT: HENDRY CORPORATION
1650 HEMLOCK STREET
TAMPA, FL 33605

BY	REVISIONS

DESIGNED BY
DRAWN BY R.M.
CHECKED BY J.S.
DATE 1-29-15
SCALE AS SHOWN
PROJECT NO. 3120
SHEET 1 of 1
1

ATTACHMENT 8 – CONTINGENCY PLAN / SPCC PLAN

SPILL PREVENTION, CONTROL, AND COUNTERMEASURE PLAN

Universal Environmental Solutions, LLC.

Industrial Wastewater Pretreatment Plant

1650 Hemlock Street
Tampa, Florida, 33605

Universal Environmental Solutions, LLC

Prepared by
Seavy & Associates, Inc.

January 31, 2015

Table of Contents

List of Tables

List of Figures

Plan Administration

Management Approval and Designated Person (40 CFR 112.7)

UES is committed to maintaining the highest standards for preventing discharges of oil to navigable waters and the environment through the implementation of this SPCC Plan. This SPCC Plan has the full approval of UES management. UES management has committed the necessary resources to implement the measures described in this Plan.

Ed Kinley is the Designated Person Accountable for Oil Spill Prevention at this UES facility and has the authority to commit the necessary resources to implement the Plan as described.

Authorized Facility Representative: Ed Kinley

Signature: E. Kinley

Title: President
Date: January 31, 2015

Professional Engineer Certification (40 CFR 112.3(d))

The undersigned Registered Professional Engineer is familiar with the requirements of Part 112 of Title 40 of the *Code of Federal Regulations* (40 CFR part 112) and has visited and examined the facility, or has supervised examination of the facility by appropriately qualified personnel. The undersigned Registered Professional Engineer attests that this Spill Prevention, Control, and Countermeasure Plan has been prepared in accordance with good engineering practice, including consideration of applicable industry standards and the requirements of 40 CFR part 112; that procedures for required inspections and testing have been established; and that this Plan is adequate for the facility. [112.3(d)]

This certification in no way relieves the owner or operator of the facility of his/her duty to prepare and fully implement this SPCC Plan in accordance with the requirements of 40 CFR part 112.

Michael Keith Coats, Florida P.E. 48917
Seavy & Associates, Inc.
2608 South 86th Street, Suite B
Tampa, Florida 33619
813-917-9267 Certificate of Authorization #6528

Signature Date: 1/31/15

MICHAEL KEITH COATS LICENSE No. 48917 STATE OF FLORIDA PROFESSIONAL ENGINEER

Introduction

The purpose of this Spill Prevention Control and Countermeasure (SPCC) Plan is to describe measures implemented by Universal Environmental Solutions, LLC (UES) to prevent oil discharges from occurring, and to prepare to respond in a safe, effective, and timely manner to mitigate the impacts of a discharge from the industrial wastewater pretreatment facility. This SPCC Plan has been prepared and implemented in accordance with the SPCC requirements contained in 40 CFR part 112.

In addition to fulfilling requirements of 40 CFR part 112, this SPCC Plan is used as a reference for oil storage information and testing records, as a tool to communicate practices on preventing and responding to discharges with UES employees and contractors, as a guide on facility inspections, and as a resource during emergency response.

UES management has determined that this facility does not pose a risk of substantial harm under 40 CFR part 112, as recorded in the "Substantial Harm Determination" included in **Appendix A** of this Plan.

This Plan provides guidance on key actions that UES must perform to comply with the SPCC rule:

- Complete monthly and annual site inspections using the inspection checklists provided in **Appendix B** (Inspection, Tests, and Records).
- Perform preventive maintenance of equipment, secondary containment systems, and discharge prevention systems described in this Plan as needed to keep them and discharge prevention systems described in proper operating conditions
- Conduct annual employee training and document them on the as outlined in the Personnel, Training, and Spill Prevention Procedures Training, documentation is included on the Employee Training Log provided in **Appendix C**.
- If either of the following occurs, submit the SPCC Plan to the EPA Region 4 and the Florida Department of Environmental Protection (FDEP) along with other information as described in this plan.
    - The facility discharges more than 1,000 gallons of oil into or upon the navigable waters of the U.S. or adjoining shorelines in a single spill event;
    - Or
- The facility discharges oil in quantity greater than 42 gallons in each of two spill events within any 12-month period

Location of SPCC Plan (40 CFR 112.3(e))

In accordance with 40 CFR 112.3(e), a complete copy of this SPCC Plan is maintained at the facility in the UES office building open from 7:00 AM to 5:00 PM, 5 days per week (closed on Saturdays and Sundays). A field copy is maintained in the treatment plant laboratory office for quick reference.

Plan Review (40 CFR 112.3 and 112.5)

In accordance with 40 CFR 112.5(a), UES periodically reviews and evaluates this SPCC Plan for any change in the facility design, construction, operation, or maintenance that materially affects the facility's potential for an oil discharge, including, but not limited to:

- commissioning of containers;
- reconstruction, replacement, or installation of piping systems;
- construction or demolition that might alter secondary containment structures; or
- changes of product or service, revisions to standard operation, modification of testing/inspection procedures, and use of new or modified industry standards or maintenance procedures.

Amendments to the Plan made to address changes of this nature are referred to as technical amendments, and must be certified by a PE. Non-technical amendments can be done (and must be documented in this section) by the facility owner and/or operator. Non-technical amendments include the following:

- change in the name or contact information (i.e., telephone numbers) of individuals responsible for the implementation of this Plan; or
- change in the name or contact information of spill response or cleanup contractors.

UES must make the needed revisions to the SPCC Plan as soon as possible, but no later than six months after the change occurs. The Plan must be implemented as soon as possible following any technical amendment, but *no later than six months* from the date of the amendment. The Facility Manager is responsible for initiating and coordinating revisions to the SPCC Plan.

Appendix D includes the SPCC Certification Log. This log must be completed even if no amendment is made to the Plan as a result of the review. Unless a technical or administrative change prompts an earlier review of the Plan, the next scheduled review of this Plan must occur by January 30, 2019

PART I - GENERAL FACILITY INFORMATION

40 CFR 112.7(a)(3)

1.1 Company Information

Name of Facility:	Universal Environmental Solutions, LLC Industrial Wastewater Pretreatment Facility
Type	Onshore oil production facility
Date of Initial Operation	March 2014
Location	1650 Hemlock Street, Tampa, Florida, 33605
Facility Contact	Ed Kinley, VP Office 813-241-9206 Cell 813-390-0659
Facility Capacity	The facility has a maximum daily onsite capacity of 285,000 gallons of preprocess wastewater, recovered waste oils, and used and virgin fuels.
Hours of Operation	The UES facility operates Monday through Friday (weekends on occasion), 10 hours per day.

1.2 Contact Information

The designated person accountable for overall oil spill prevention and response at the facility, also referred to as the facility's "Response Coordinator" (RC), is the President, Ed Kinley. 24-hour contact information is provided in Table 1-1.

Table 1-1: Facility Contact Information

Name	Title	Telephone	Address
Ed Kinley	President/Response Coordinator Universal Environmental Solutions	(813) 241-9206 (office) (813) 390-0659 (cell)	1650 Hemlock Street Tampa, Florida 33605
Brian Russel	Facility Operation Manager Universal Environmental Solutions	(813) 241-9206 (office) (813) 406-9835 (cell)	1650 Hemlock Street Tampa, Florida 33605
Joe Cimino	Vice President Hendry Corporation	(813) 241-9206 (office) (813) 690-5998 (cell)	1650 Hemlock Street Tampa, Florida 33605
24-Hour Security		(813) 241-9206 (office) (813) 422-9153 (cell)	1650 Hemlock Street Tampa, Florida 33605

1.3 Facility Description (40 CFR 112.7(a)(3))

1.3.1 Facility Location

UES operates and industrial wastewater pretreatment plant on the south eastern portion Hendry Corporation's ship repair facility located in Tampa, Florida. As shown in **Figure 1-1**, the Hendry facility operates at Berths 247 and 248 in Port Ybor, on the east side of the Sparkman Channel. Gulf Marine Repair operated a ship repair facility to the north, A TECO substation is located along the south east, CSX operates a switch yard to the east, and Argos material operates a cement facility to the south. The Hendry facility is separated by the Argos facility by a security fence and a stormwater retention pond and pond overflow drainage ditch that runs the length of the property border between Vulcan and Gulf Marine. This stormwater drainage ditch flows to the west discharging into Sparkman Channel. Any release from the facility that enters this drainage ditch has the potential to reach the Sparkman Channel, a navigable waterway. All stormwater from the UES facility that does not percolated into the ground is routed to this ditch. Due to the facilities close proximity to the Sparkman Channel, the facility could reasonably be expected to discharge oil in harmful quantities into navigable waters of the United States.

1.3.2 Facility Operations

The UES pretreatment facility is permitted to accept Non Hazardous Wastewater (Subcategory D, Clean Water Act, multiple waste streams subcategory)and discharge pretreated effluent to the sanitary sewer in accordance with the facility's City of Tampa Discharge Permit (Permit # 1112). Waste oil is generated primarily from the treatment of bilge water. Waste and virgin fuel are generated from removal from vessels prior to ship repair operations by Hendy, Gulf Marine Repair, and other local ship repair facilities. Both waste oils and fuels and accumulated in tanks located within secondary containment prior to off-site recycling by local waste oil and fuel recycling facilities.

The UES facility is comprised of an estimates 4,890 square foot building housing an inside pretreatment process system, a concrete containment area adjacent to the building, and a truck unloading area to the west and north of the containment pad; and a double walled pipeline to transfer bilge water from Berth 247 to the treatment. The industrial wastewater treatment process components are located inside a metal building and includes a diffused air flotation (DAF) system and seven tanks used for chemical mixing and wastewater treatment. The DAF and seven chemical mixing tanks, are situated within a secondary containment capable of housing 110 percent (%) of the largest tank.

1.3.3 Oil and Fuel Storage and Handling

Waste oil and fuels are stored in above ground storage tanks (ASTs) that contain various pre-process and post process wastewater, oils, and fuels. The tanks are located within a concrete secondary containment area on the north side of the pre-treatment building. This secondary containment is a zero discharge containment system with no drainage system for stormwater. All stormwater or potential spills into the containment drain to a sump located in the

southeastern corner of the containment structure and are pumped back into the pre-process wastewater tanks for treatment. Table 1-2 lists all oil containers present at the facility with capacity of 55 gallons or more. The capacities of oil containers present at the site are listed below and are also indicated on the facility diagram in Figure 1-2.

Table 2-2: Characteristics of Containers

ID	Type	Construction	Primary Content	Capacity (gallons)
#1	AST	Steel	Pre-Process Wastewater and Bilge Water	69,115
#2	AST	Steel	Pre-Process Wastewater and Bilge Water	69,115
#3	AST	Steel	Pre-Process Wastewater and Bilge Water	69.115
#4	AST	Steel	Pre-Process Wastewater and Leachate	60,318
#5	AST	Polyethylene	Recovered Oil	10,000
#6	AST	Steel	Used and Virgin Diesel Fuel	5,000
#7	AST	Steel	Used and Virgin Diesel Fuel	5,000
#8	AST	Steel	Used and Virgin Diesel Fuel	5,000
#9	Open Tank	Steel	DAF Treatment Vessel	3,000
#10	AST	Polyethylene	Treatment System Effluent	3,000
#11	AST	Polyethylene	Sodium Hydroxide	1,000
#12	AST	Polyethylene	Flocculent	1,500
#13	AST	Polyethylene	Coagulant	1,500
			TOTAL	307,663

1.3.4 Transfer Activities

Figure 1-2 presents the location of the loading a0nd unloading area as well as all process and transfer piping. The loading and unloading area(s) for tank trucks provides a connection box to capture hose connect / disconnect spills. The connection box / manifold are fitted with two flanges which are capped. The connection box / manifolds are covered with a hinged lid to prevent rainfall accumulation. Any noticeable free liquids accumulated in the box is absorbed by the plant operator in the daily / routine maintenance. All unloading activities are supervised by pre-treatment plant personnel. In the event of a hose failure by a delivery tank truck, the valve from the truck is immediately closed. Any spill residue will be contained in the spill box and will be absorbed by spill kits at the facility. Under this scenario less than 25 gallons will spill and no spill will occur to the ground surface. An incident that will be managed internally and not require notification.

A doubled walled underground pipe carries the bilge oily water from the Berth 247 to the oily bilge water transfer containment box located near west wall of the containment area. The doubled walled pipeline is 800' feet long and is a 6-inch inner pipe diameter and 10-inch outer pipe diameter double walled welded high density polyethylene (HDPE). The HDPE pipes are contained inside a 15-inch abandoned storm water pipe that has been repurposed to contain the potential leaks within the pipeline. Temporary transfer piping is connected to the doubled walled subgrade piping at Berth 247. The pipeline at berth 247 has a check valve and hand valve that prevents backflow of liquids from the facility to Berth 247. Two secondary pipe leak alarms are installed in the interstitial space between the primary and secondary piping. The alarm is integrated into the onsite PLC. An audio and visual indicator alarms system will alert the plant operator in the event of a primary pipe leak alarm. **Figure 1-2** depicts the location of the pipeline connections at Berth 247, pipeline location and tank pad containment area transfer containment box location and alarm locations.

1.3.5 Facilities, Procedures, Methods, or Equipment Not Yet Fully Operational (40 CFR 112.7)

This section discusses two plant upgrade projects currently scheduled for construction by March 2015. These projects include construction of a secondary containment pad for frac tank storage and unloading operations and relocation of the truck loading / unloading containment boxes on the north and south side of the facility to the new frac tank containment area; and retrofit of a former water storage tank and installation of pumps, piping and secondary containment for storage and treatment of landfill leachate. Upon completion of these projects, the upgrades will be inspected by a professional engineer and the plan will be recertified using the SPCC Certification Log included in **Appendix D.**

Frac Tank Containment Pad

The facility receives Bilge Oily Waters and depending on the facility's available storage space may temporarily store the wastewater in 20,000-gallon mobile frac tanks. The frac tanks are temporary staged on the west side of the tank farm for unloaded into one of three 69,000-gallon steel above ground storage tanks used to store raw wastewater prior to treatment (pre-process tanks). The frac tank contents are pumped into the pre-process connection box for transfer into the pre-process tanks.

While the wastewater in the frac tanks contains only residual amounts of petroleum products, UES has designed and is in process of constructing a 90 feet by 60 feet concrete containment pad with sufficient volume to hold four 20,000-gallon frac tank for future expansion. Stormwater or potential spills will be routed to a sump located within the containment area. All stormwater will be pumped into the pre-process tanks. UES does not have a means to drain stormwater from any of the containment areas but instead treats all stormwater collected in the containment area. All piping installed to drain the tanks will be double wall piping. **Figure 1-2** shows the extent and layout of the new frac tank containment, relocation of the loading / unloading containment boxes and double walled piping layout.

Leachate Tank Rehabilitation and Transfer Facility

UES is upgrading a former water storage tank located on the southeast portion of the facility for storage of landfill leachate prior to treatment. The leachate treatment upgrades will include an unloading area on the north side of the tank farm, unloading pumps located within the tank farm secondary containment berm, single wall piping with secondary containment berms, and double wall piping at locations without secondary containment. The leachate contains no oil products and is not classified as hazardous waste. Figure 1-2 shows the extent and layout of the leachate storage and transfer facility.

1.3.6 Proximity to Navigable Waters

Figure 1-3 (Facility Drainage Map) shows the location of the facility relative to nearby waterways. The facility is located approximately 800 feet west of Sparkman Channel, a dredged channel maintained by Port Tampa Bay. The facility is located on relatively level terrain. With the exception of grassy areas to the south and east of the facility, the majority of the site is built on crushed concrete base. All stormwater or potential spills will either percolate into the ground; flow to the south to an open ditch on the south side of the facility near the southern fence line; or drain into a stormwater grate inlet located just west of the facility. The stormwater grate inlet flows to the open ditch on the south of the facility via two 12-inch stormwater pipes. The two 12-inch stormwater pipes discharge into a 15" concrete stormwater pipe that runs east to an open ditch. Stormwater that is routed to the open ditch drains off-site via a 12-inch stormwater pipe that leads to an off-site retention pond area, the retention pond overflow ditch lows approximately 900 feet to the west, eventually discharging into the Sparkman Channel. In the event of a spill or release, UES is prepared to block off-site drainage from the 2-12-inch storm pipe.

1.1.7 Conformance with Applicable State and Local Requirements [112.7(j)]

The SPCC regulation at 40 CFR part 112 is more stringent than requirements from the state of Florida for this type of facility. This SPCC Plan was written to conform with 40 CFR part 112 requirements. The facility thereby conforms to general requirements for oil pollution facilities in Florida. All discharge notifications are made in compliance with local, state, and federal requirements.

PART II - SPILL RESPONSE AND REPORTING

40 CFR 112.7

2.1 Discharge Discovery and Reporting [112.7(a)(3)]

2Several individuals and organizations must be contacted in the event of an oil discharge. The Field Operations Manager is responsible for ensuring that all required discharge notifications have been made. All discharges should be reported to the Response Coordinator. This section provides a list of agencies to be contacted under different circumstances as well as information to be obtained for reporting and documenting a release. **Appendix E** includes a Discharge Reporting Log Form to be used for collection of this information.

If emergency medical services are necessary, immediately notify 911 and stabilize the injured person prior to performing spill response actions.

A reportable spill includes a petroleum product release to an impervious surface in an amount greater than 100 gallons and/or to a pervious surface in an amount greater than 25 gallons and/or **discharge" as defined in 62 FAC 780.200, a report must be made to the local county Environmental Management Department within 24 hours of the classification determination. A blank Discharge Report Form is provided as Appendix E.**

2.1.1 Spill Reporting (40 CFR 112.7(a)(4))

If spilled petroleum product has been released to an impervious surface in an amount less than 100 gallons and/or to a pervious surface in an amount less than 25 gallons and/or did not create sheen on surface water, immediately notify:

- ED Kinley – (813) 390-0659.

If spilled petroleum product has been released to an impervious surface in an amount greater than 100 gallons and/or to a pervious surface in an amount greater than 25 gallons and/or created sheen on surface water, immediately notify the following contacts listed below and prepare the applicable reports listed in subsection D. **The State Warning Point will not be required to be notified if the spill is classified a "Deminimis discharge" as defined in 62 FAC 780.200.**

- ED Kinley– Facility Operator Manager (813) 390-0659
- State Warning Point (800) 320-0519 (w/n 24 hours)

If spilled petroleum product has been released offsite or into sewer inlets in any quantity immediately call the following contacts for advice regarding notifications and response actions:

- UES (813) 241-9206
- SWS Environmental (813) 241-0282

If spilled petroleum product has been released to an impervious surface in an amount greater than 100 gallons and/or to a pervious surface in an amount greater than 25 gallons and/or created sheen on surface water, immediately notify the following contacts listed below and prepare the applicable reports listed included in **Appendix F**.

The State Warning Point will not be required to be notified if the spill is classified a "Deminimis discharge" as defined in 62 FAC 780.200.

- ED Kinley– Facility Operator/Owner/Manager (813) 390-0659
- State Warning Point (877) 272-8335 (w/n 24 hours)
- National Response Center (NRC) (800) 424-8802 (w/n 24 hours)
  2100nd Street, SW Washington, DC 20593

Plan to provide the following information:

- ☐ The name, address and telephone number of the person making the telephone report;
- ☐ The date, time, and location of the spill or discharge;
- ☐ A specific description or identification of the oil, petroleum product, hazardous substances or other substances discharged or spilled;
- ☐ An estimate of the quantity discharged or spilled;
- ☐ The duration of the incident;
- ☐ The name of the surface water or a description of the waters in the state affected or threatened by the discharge or spill;
- ☐ The source of the discharge or spill;
- ☐ A description of the extent of actual or potential water pollution
- ☐ Harmful impacts to the environment and an identification of any
- ☐ Environmentally sensitive areas or natural resources at risk;
- ☐ If different from paragraph (1) of this subsection, the names, addresses, and telephone numbers of the responsible person and the contact
- ☐ Person at the location of the discharge or spill;
- ☐ A description of any actions that have been taken, are being taken, and will be taken to contain and respond to the discharge or spill;
- ☐ Any known or anticipated health risks;
- ☐ The identity of any governmental representatives, including local authorities or third parties, responding to the discharge or spill;
- ☐ Any other information that may be significant to the response action.

2.1.2 Submission of SPCC Information

Whenever the facility experiences a discharge into navigable waters of more than 1,000 gallons, or two discharges of 42 gallons or more within a 12-month period, UES will provide information in writing to the EPA Region 6 office within 60 days of a qualifying discharge as described above. The required information is described in Appendix F of this SPCC Plan.

2.2 Spill Response Materials

Discuss locations and types of spill response equipment available. The facility has 6 spill kits located at various potential spill locations and frequent operations areas and 1 spill kit located at Berth 247 during cleaning activities. The spill contain the following items:

- 12) Gray 3" x 12' universal sorbent polypropylene socks
- (4) Gray 12" x 17" universal sorbent polypropylene pillows
- (60) Gray 16" x 18" universal sorbent polypropylene pads
- (10) Temporary disposal bags
- (1) Pair perforated vent frame safety goggles
- (1) Pair Nitrile gloves
- (1) Emergency Response Guidebook 18283 (14-ORS-2)
- (1) 55-gallon polyethylene drum with snap ring lid - UN-Certified – UN1H2/X250/S/00
- Shovel Large Snow Type and Spade Type
- Copy of the SPCC Plan

Figure 1-4 depicts spill kit locations and emergency response Health and Safety kits. Additional equipment and material are also kept at the field office. The inventory is checked monthly by UES operations personnel to ensure that used material is replenished.

2.3 Spill Mitigation Procedures

The following is a summary of actions that must be taken in the event of a discharge. It summarizes the distribution of responsibilities among individuals and describes procedures to follow in the event of a discharge.

A complete outline of actions to be performed in the event of a discharge reaching or threatening to reach navigable waters is included in the facility Contingency Plan.

Reminder: *In the event of a discharge facility personnel must immediately implement the Oil Spill Contingency Plan. The Oil Spill Contingency Plan discusses the additional procedures that must be followed to respond to a discharge of oil to navigable waters or adjoining shorelines.*

In the event of a discharge, UES or contractor field personnel and the Field Operations Manager shall be responsible for the following:

2.3.1 Shut Off Ignition Sources

Field personnel must shut off all ignition sources, including motors, electrical circuits, and open flames.

2.3.2 Stop Oil Flow

Field personnel should determine the source of the discharge, and if safe to do so, immediately shut off the pumps.

2.3.3 Stop the Spread of Oil and Call the Field Operations Manager

If safe to do so, field personnel must use resources available at the facility (see spill response material and equipment listed in Section 2.3) to stop the spilled material from spreading. Measures that may be implemented, depending on the location and size of the discharge, include placing sorbent material or other barriers in the path of the discharge (e.g., sand bags), or constructing earthen berms or trenches.

In the event of a significant discharge, field personnel must immediately contact the Field Operations Manager, who may obtain assistance from authorized company contractors and direct the response and cleanup activities. Should a discharge reach Sparkman Channel, only physical response and countermeasures should be employed, such as the construction of underflow dams, installation of hard boom and sorbent boom, use of sorbent pads, and use of vacuum trucks to recover oil and oily water from the waterway. At no time shall any surfactants, dispersants, or other chemicals be used to remove oil from the channel.

2.3.4 Gather Spill Information

The Field Operations Manager will ensure that the *Discharge Notification Form* is filled out and that notifications have been made to the appropriate authorities. The Field Operations Manager may ask for assistance in gathering the spill information on the *Discharge Notification Form* (**Appendix F**) of this Plan

2.3.5 Notify Agencies Verbally

Some notifications must be completed *immediately* upon discovering the discharge. It is important to immediately contact the Field Operations Manager so that timely notifications can be made. If the Field Operations Manager is not available, or the Field Operations Manager requests it, field personnel must designate one person to begin notification. Section 2.1 of this Plan describes the required notifications to government agencies. The Field Operations Manager must also ensure that written notifications, if needed, are submitted to the appropriate agencies.

2.4 Disposal Plan

The cleanup contractor will handle the disposal of any recovered product, contaminated soil, contaminated materials and equipment, decontamination solutions, sorbents, and spent chemicals collected during a response to a discharge incident.

Any recovered product that can be recycled will be placed into the gun barrel tank to be separated and recycled. Any recovered product not deemed suitable for on-site recycling will be disposed of with the rest of the waste collected during the response efforts.

If the facility responds to a discharge without involvement of a cleanup contractor, UES will contract a licensed transportation/disposal company to dispose of waste according to regulatory requirements. The Field Operations Manager will characterize the waste and arrange for the 2use of certified waste containers.

All facility personnel handling hazardous wastes must have received both the initial 40-hour and annual 8-hour refresher training in the Hazardous Waste Operations and Emergency Response Standard (HAZWOPER) of the Occupational Health and Safety Administration (OSHA). This training is included as part of the initial training received by all field personnel. Training records and certificates are kept at the field office.

PART III - SPILL PREVENTION, CONTROL, AND COUNTERMEASURE PROVISIONS

40 CFR 112.7 and 112.9

3.1 Potential Discharge Volume and Direction of Flow [112.7(b)] and Containment [112.7(a)(3)(iii)]

Table 3-1, below, summarizes potential oil discharge scenarios. If unimpeded, oil would follow the site topography and reach Sparkman Channel via an off-site stormwater ditch bordering the southern property boundary.

Table 3-1: Potential Discharge Volume and Direction of Flow

Source	Type of failure	Maximum Volume	Maximum Discharge	Direction of Flow	Containment
Tank Farm					
Process Tanks	Fatal tank rupture due to lightning	69,115	69,115	Southeast towards containment pad sump	Containment berm
PCW Tanks		5,000	2	Southeast towards containment pad sump	Containment berm
Piping	Overflow (1 day's production)	5,000	30	Southeast towards containment pad sump	Containment berm
Treatment System					
Treated, partially treated or untreated industrial	Rupture/failure due to corrosion or	3,000	3,000	South towards offsite ditch	Containment berm
	Pinhole leak, or leak at connection	50	2	South towards offsite ditch	Containment berm
Transfers and Loading Operations					
Transport truck loading hose	Rupture	85	85	Towards stormwater inlets	Containment berm (pending)
Offload line, connection	Leak	42	1	Towards stormwater inlets	Containment berm (pending)
Tank truck	Over-topping while loading	1,680	1,680	Towards stormwater inlets	Containment berm (pending)
Transfer valve	Rupture, leak of valve packing	3	3	Towards stormwater inlets	Transfer box containment
Berth 247 Barge Cleaning					
Bilge Pump Piping Rupture	Rupture	750	150	Towards stormwater piping inlet	Quantity spilled not great enough to reach stormwater piping.
Frac Tank Piping Rupture	Rupture	750	150	Towards stormwater piping	Quantity spilled not great enough to reach stormwater piping.

3.2 Containment and Diversionary Structures [112.7(c) and 112.7(a)(3)(iii)]

3.2.1 Bulk Storage Tank Containment

Waste oil and fuels are stored in above ground storage tanks (ASTs) that contain various pre-process and post process wastewater, oils, and fuels. The tanks are located within a concrete secondary containment area on the north side of the pre-treatment building. The containment pad measures 85.3 feet x 77.9 feet with walls measuring 2.5 feet high. The total capacity of the containment pad is 124,259 gallons. This secondary containment is a zero discharge containment system with no drainage system for stormwater. All stormwater or potential spills into the containment drain to a sump located in the southeastern corner of the containment structure and are pumped back into the pre-process wastewater tanks for treatment.

3.2.2 Loading and Unloading Area Containment

The loading and unloading area(s) for tank trucks provides a connection box to capture hose connect / disconnect spills. The connection box / manifold are fitted with two flanges which are capped. The connection box / manifolds are covered with a hinged lid to prevent rainfall accumulation. Any noticeable free liquids accumulated in the box is absorbed by the plant operator in the daily / routine maintenance. The Frac Tank and loading/unloading containment pad is scheduled to be constructed in March 2015. All offloading and loading of oil containing materials will occur within the frac tank pad area. The Frac Tank area design consists of a 60'x90' concrete pad sloped from ground surface at the truck entry point to 1.5' below existing grade at the back wall stopping point. For capacity calculations the floor of the containment structure starts at 0' below grade and ends at 1.5' below grade, the average depth of the bottom of the containment structure is 0.75' below grade. A 3" concrete berm curb will extend above ground surface on three sides that the trucks do not enter and a 4" containment hump will be located along the truck entryway to prevent spills exposure from ground surface and rainwater from entering the frac containment area. Bollards will be placed at 3' intervals around the 3 non-truck entryway sides to prevent accidental spillage caused by trucks driving into the frac tank containment area.

The frac tank containment capacity is 30,294 gallons (60'x90'x0.75'x 7.48 gallons/cu.ft. Loading and unloading piping will consist of 3 – 3" steel pipeline headers, one for unloading of PCW, one for unloading of bilge oily wastes and used oils and one for loading of recovered used oils. These 3 pipelines will be housed in a secondary 15" fiberglass containment pipe that is sloped back towards the frac containment area. The unloading and loading pipelines terminate in the tank containment pad area and connect to the tanks located on the tank containment pad.

3.2.3 Wastewater Treatment Facility Containment

The wastewater treatment facility includes a DAF unit and several process and chemical tanks. The entire treatment system is located inside a metal building on a concrete floor with a one foot high containment wall surrounding the treatment units with a containment capacity of 11,250 gallons. The pre-treatment operation tanks have a total capacity of 9,000 gallons.

3.2.4 Secondary Containment Calculations

The berm capacity exceeds the SPCC and Florida requirements. It provides secondary containment sufficient for the size of the largest tank, plus 10% of freeboard to contain precipitation. The secondary containment structure are zero discharge containment system with no drainage system for stormwater. All stormwater or potential spills into the containment drain to a sump located within the secondary containment structure and are pumped back into the pre-process wastewater tanks for treatment. Details of the berm capacity calculation are provided in Table 4-2.

Table 3-2: Berm Capacity Calculations

Tank Containment Pad Capacity	
Berm height	2.5 ft.
Largest Tank	Tank #1 – 69,115 gallons
Berm dimensions	85.34 ft. x 77.91 ft. = 6,648.84 ft^2
Other Tank Footprints	2 tanks (#2,#3) @ 55 ft. x14 ft. each = 2 x (55 ft. x 14 ft.) = 1,540 ft^2
	1 tank (#4) @ 48 ft. x 14 ft. = 48 x 14 ft. = 672 ft^2
	1 tank @ 12 ft. dia. = π x 6^2 ft.= 113.04 ft^2
	3 tanks (#6, #7, #8 at 10 ft. dia. Each = 3 x (π x 5^2 ft.) = 235.5 ft^2
Net volume	2.5 ft. x (6,648.84 ft^2 - 2,560.54 ft^2) = 10,220.75 ft^3 x 7.48 gallons/ ft^3= 76,451.21 gallons
Ratio to largest tank	76,451.21 / 69,115 = 110.6%
Corresponding Amount of Freeboard	
100% of tank volume	69,115 gallons = 9,240 ft^3
Net area (minus tank footprint)	6,648.84 ft^2 – 2,560.54 ft^2 = 4,088.3 ft^2
Minimum berm height for 100% of tank volume	9,240 ft^3 / 4,088.3 ft^2 = 2.26 ft.
Freeboard	2.5 ft. – 2.26 ft. = 0.24 ft.

Frac Tank Containment Pad Capacity	
Berm height	0.75 ft.
Largest Tank	Tank #1 – 20,000 gallons
Berm dimensions	90 ft. x 60 ft. = 5,400 ft2
Other Tank Footprints	3 tanks (Frac 2,3,4) @ 43 ft. x 8 ft. each = 3 x (43 ft. x 8 ft.) = 1,032 ft2
Net volume	0.75 ft. x (5,400 ft2 - 1,032 ft2) = 4,368 ft3 x 7.48 gallons/ ft3= 24,504.48 gallons
Ratio to largest tank	24,504.48 / 20,000 = 122%
Corresponding Amount of Freeboard	
100% of tank volume	20,000 gallons = 2,673.80 ft3
Net area (minus tank footprint)	4,368 ft2 – 2,673.80 ft2 = 1,694.2 ft2
Minimum berm height for 100% of tank volume	1,694.2 ft3 / 2,673.8 ft2 = 0.63 ft.
Freeboard	0.75 ft. – 0.63 ft. = 0.12 ft.

3.2.5 Practicability of Secondary Containment [112.7(d)]

The use of the containment and diversionary structures and the use of readily available spill equipment to prevent discharged oil from reaching navigable water, is practical and effective at this facility.

3.3 Inspections, Tests, and Records [112.7(e)]

This Plan outlines procedures for inspecting the facility equipment in accordance with SPCC requirements. Records of inspections performed as described in this Plan and signed by the appropriate supervisor are a part of this Plan, and are maintained with this Plan at the Tampa Florida office for a minimum of three years. The reports include a description of the inspection procedure, the date of inspection, whether drainage of accumulated rainwater was required, and the inspector's signature.

The inspection program is comprised of informal daily examinations, monthly scheduled inspections, and periodic condition inspections. Additional inspections and/or examinations are performed whenever an operation alert, malfunction, shell or deck leak, or potential bottom leak

is reported following a scheduled examination. Written examination/inspection procedures and monthly examination/inspection reports are signed by the field inspector and are maintained at the field office for a period of at least three years.

3.3.1 Daily Examinations

Daily visual inspections consist of a complete walk-through of the facility to check the following: piping, equipment and tanks for leakage, soils for staining and discoloring, excessive accumulation of rainwater in the dike, verification that the dike drain valve is sealed closed, and to confirm that the facility effluent (from water separator) is free from oil.

3.3.2 Monthly Inspections

The checklists provided in **Appendix B** is used during monthly inspections. The items covered in the inspections are performed in accordance with API standards and good engineering practices. These written monthly and annual reports (checklists) are prepared, signed by the inspector, and the original copies are maintained on file for three years.

3.4 Brittle Fracture Evaluation [112.7(i)]

At the present time, none of the bulk storage containers at this site was field-erected, and therefore no brittle fracture evaluation is required.

3.5 Security (40 CFR 112.7(g))

The UES facility has the following security measures in-place for the storage of oil products when the facility is not in production:

Fencing and Lighting
There is fencing and two gates to control entrance or egress from the Pre-Treatment area. The building is secured with a perimeter fence and requires a key to enter facility during nonworking hours. UES owned lights are located throughout the property. The facility is locked during non-operating hours.

Surveillance
One UES owned camera is located on the northwest corner of the Pre-Treatment building overlooking the two entrance gates that are monitored by the onsite security personnel. The security personnel are familiar with this SPCC Plan and have a copy on file should a spill be identified during walk rounds and inspections.

Alarms
Audible and visual alarms are installed within the process system PLC and are operating 24hours a day 7 days a week.

3.6 Personnel, Training, and Discharge Prevention Procedures [112.7(f)]

The Field Operations Manager has been designated as the point of contact for all oil discharge prevention and response at this facility.

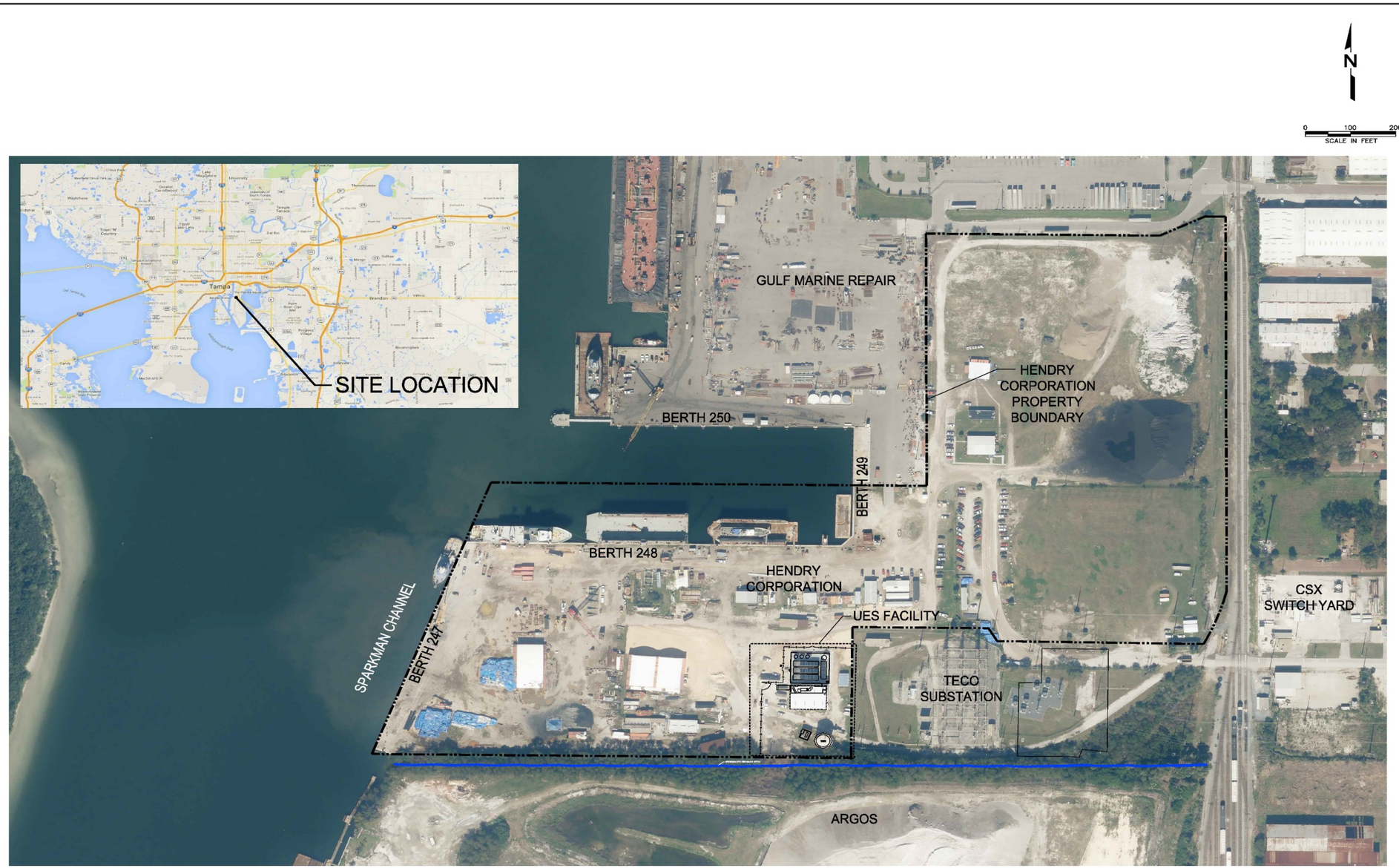
All UES field personnel receive training on proper handling of oil products and procedures to respond to an oil discharge prior to entering the production facility. The training ensures that all facility personnel understand the procedures described in this SPCC Plan and are informed of the requirements under applicable pollution control laws, rules and regulations. All UES field personnel also receive an initial 40-hour HAZWOPER training (and 8-hour annual refresher training) as per OSHA standard.

UES ensures that all contractor personnel are familiar with the facility operations, safety procedures, and spill prevention and control procedures described in this Plan prior to working at the facility. UES management holds briefings with field operations personnel (including contractor personnel as appropriate) at least once a year, as described below.

3.6.1 Spill Prevention Briefing

The Field Operations Manager conducts Spill Prevention Briefings annually to ensure adequate understanding and effective implementation of this SPCC Plan. These briefings highlight and describe known spill events or failures, malfunctioning components, and recently developed precautionary measures. The briefings are conducted in conjunction with the company safety meetings. Sign-in sheets, which include the topics of discussion at each meeting, are maintained with this Plan at the UES office. An Employee Training Log form is provided in **Appendix C** to this Plan and is used to document the briefings. The scheduled annual briefing includes a review of UES policies and procedures relating to spill prevention, control, cleanup, and reporting; procedures for routine handling of products (e.g., loading, unloading, transfers); SPCC inspections and spill prevention procedures; spill reporting procedures; spill response; and recovery, disposal, and treatment of spilled material.

Personnel are instructed in operation and maintenance of equipment to prevent the discharge of oil, and in applicable federal, state, and local pollution laws, rules, and regulations. Facility operators and other personnel have an opportunity during the briefings to share recommendations concerning health, safety, and environmental issues encountered during facility operations.



SEAVY & ASSOCIATES, INC.
2608 South 86th Street, Suite B
Tampa, FL 33619

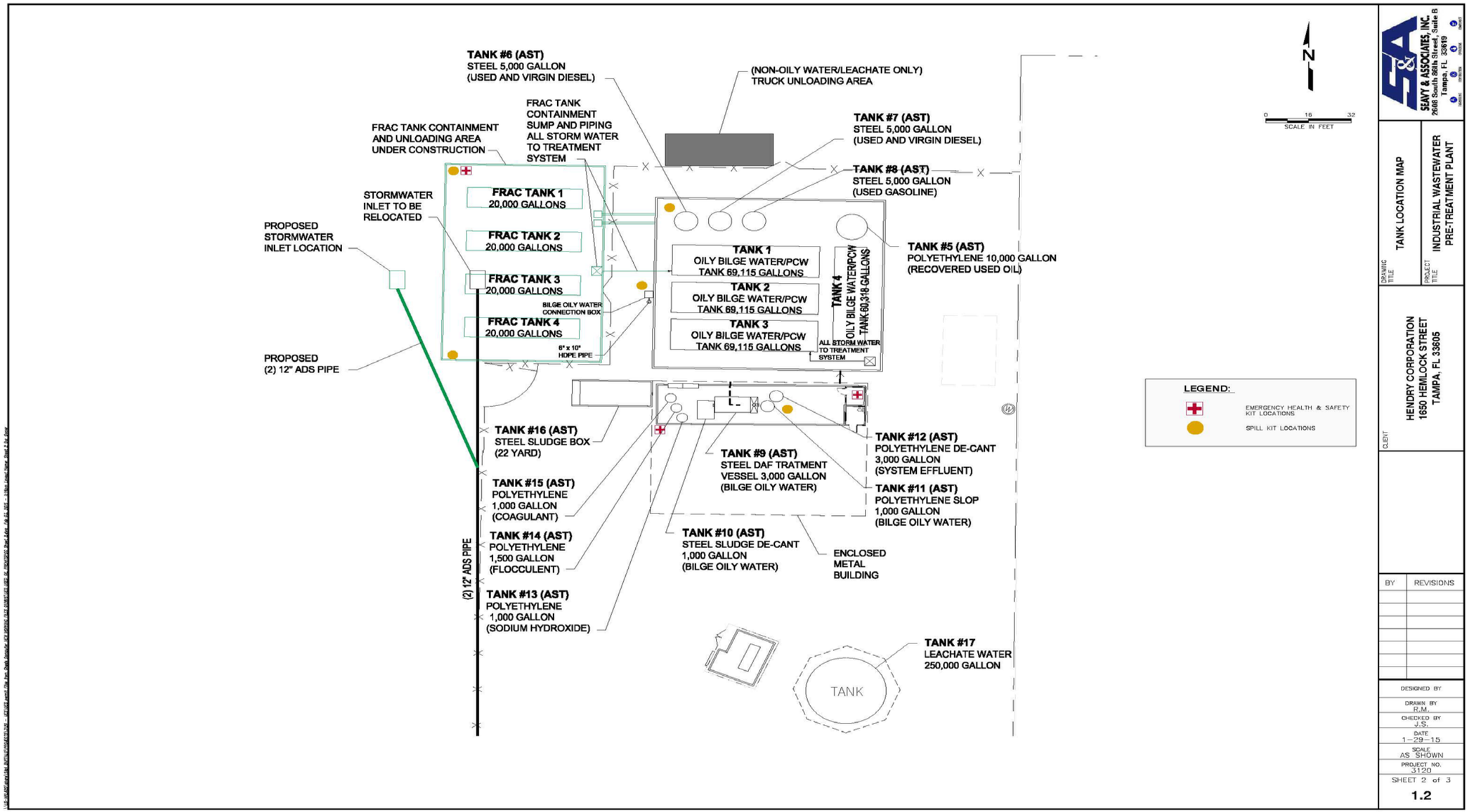
DRAWING TITLE: SITE LOCATION MAP

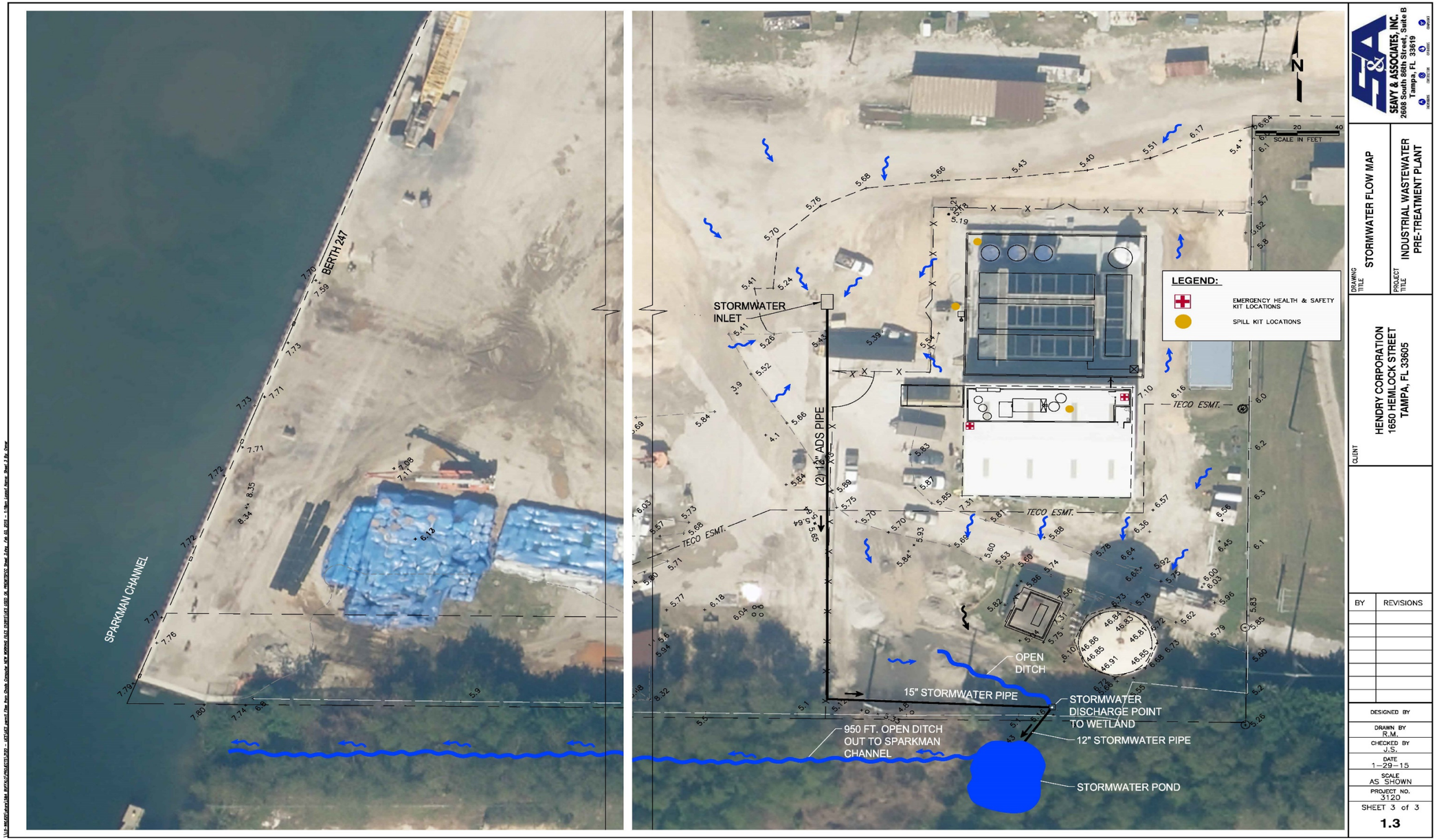
PROJECT TITLE: INDUSTRIAL WASTEWATER PRE-TREATMENT PLANT

CLIENT: HENDRY CORPORATION
1650 HEMLOCK STREET
TAMPA, FL 33605

BY	REVISIONS

DESIGNED BY
DRAWN BY R.M.
CHECKED BY J.S.
DATE 1-29-15
SCALE AS SHOWN
PROJECT NO. 3120
SHEET 1 of 3
1.1


TANK #6 (AST)
STEEL 5,000 GALLON
(USED AND VIRGIN DIESEL)
(NON-OILY WATER/LEACHATE ONLY)
TRUCK UNLOADING AREA
FRAC TANK CONTAINMENT
SUMP AND PIPING
ALL STORM WATER
TO TREATMENT
SYSTEM
FRAC TANK CONTAINMENT
AND UNLOADING AREA
UNDER CONSTRUCTION
TANK #7 (AST)
STEEL 5,000 GALLON
(USED AND VIRGIN DIESEL)
TANK #8 (AST)
STEEL 5,000 GALLON
(USED GASOLINE)
STORMWATER
INLET TO BE
RELOCATED
FRAC TANK 1
20,000 GALLONS
PROPOSED
STORMWATER
INLET LOCATION
FRAC TANK 2
20,000 GALLONS
FRAC TANK 3
20,000 GALLONS
TANK 1
OILY BILGE WATER/PCW
TANK 69,115 GALLONS
TANK 2
OILY BILGE WATER/PCW
TANK 69,115 GALLONS
TANK 3
OILY BILGE WATER/PCW
TANK 69,115 GALLONS
TANK 4
OILY BILGE WATER/PCW
TANK 60,318 GALLONS
TANK #5 (AST)
POLYETHYLENE 10,000 GALLON
(RECOVERED USED OIL)
BILGE OILY WATER
CONNECTION BOX
FRAC TANK 4
20,000 GALLONS
6" x 10"
HDPE PIPE
ALL STORM WATER
TO TREATMENT
SYSTEM
PROPOSED
(2) 12" ADS PIPE
TANK #16 (AST)
STEEL SLUDGE BOX
(22 YARD)
TANK #9 (AST)
STEEL DAF TRATMENT
VESSEL 3,000 GALLON
(BILGE OILY WATER)
TANK #12 (AST)
POLYETHYLENE DE-CANT
3,000 GALLON
(SYSTEM EFFLUENT)
TANK #11 (AST)
POLYETHYLENE SLOP
1,000 GALLON
(BILGE OILY WATER)
TANK #15 (AST)
POLYETHYLENE
1,000 GALLON
(COAGULANT)
TANK #14 (AST)
POLYETHYLENE
1,500 GALLON
(FLOCCULENT)
TANK #10 (AST)
STEEL SLUDGE DE-CANT
1,000 GALLON
(BILGE OILY WATER)
ENCLOSED
METAL
BUILDING
(2) 12" ADS PIPE
TANK #13 (AST)
POLYETHYLENE
1,000 GALLON
(SODIUM HYDROXIDE)
TANK #17
LEACHATE WATER
250,000 GALLON
TANK
N
0
16
32
SCALE IN FEET
LEGEND:
EMERGENCY HEALTH & SAFETY KIT LOCATIONS
SPILL KIT LOCATIONS
SEAVY & ASSOCIATES, INC.
2668 South 86th Street, Suite B
Tampa, FL 33619
DRAWING TITLE
TANK LOCATION MAP
PROJECT TITLE
INDUSTRIAL WASTEWATER
PRE-TREATMENT PLANT
CLIENT
HENDRY CORPORATION
1650 HEMLOCK STREET
TAMPA, FL 33605
BY
REVISIONS
DESIGNED BY
DRAWN BY
R.M.
CHECKED BY
J.S.
DATE
1-29-15
SCALE
AS SHOWN
PROJECT NO.
3120
SHEET 2 of 3
1.2


BERTH 247
SPARKMAN CHANNEL
STORMWATER INLET
(2) 12" ADS PIPE
TECO ESMT.
OPEN DITCH
15" STORMWATER PIPE
STORMWATER DISCHARGE POINT TO WETLAND
12" STORMWATER PIPE
950 FT. OPEN DITCH OUT TO SPARKMAN CHANNEL
STORMWATER POND
N
SCALE IN FEET
LEGEND:
EMERGENCY HEALTH & SAFETY KIT LOCATIONS
SPILL KIT LOCATIONS
SEAVY & ASSOCIATES, INC.
2608 South 86th Street, Suite B
Tampa, FL 33619
DRAWING TITLE
STORMWATER FLOW MAP
PROJECT TITLE
INDUSTRIAL WASTEWATER PRE-TREATMENT PLANT
CLIENT
HENDRY CORPORATION
1650 HEMLOCK STREET
TAMPA, FL 33605
BY
REVISIONS
DESIGNED BY
DRAWN BY R.M.
CHECKED BY J.S.
DATE 1-29-15
SCALE AS SHOWN
PROJECT NO. 3120
SHEET 3 of 3
1.3

APPENDIX A
Certification of Substantial Harm Determination
40 CFR 112.20(e), 40 CFR 112.20(f)(1)

Facility Name: **Universal Environmental Solutions, LLC, Industrial Wastewater Pretreatment Facility, Tampa, Florida**

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 **X**

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 storage tank area?
Yes No **X**

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) such that a discharge from the facility could cause injury to fish and wildlife and sensitive environments?
Yes No **X**

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) such that a discharge from the facility would shut down a public drinking water intake?
Yes No **X**

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 spill in an amount greater than or equal to 10,000 gallons within the last 5 years?
Yes No **X**

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.

Ed Kinley, President

Signature: _____ *January 31, 2015*

APPENDIX B
Monthly and Annual Inspection Checklist

Further description and comments, if needed, should be provided on a separate sheet of paper and attached to this sheet. Any item answered "YES" needs to be promptly reported, repaired, or replaced, as it may result in non-compliance with regulatory requirements. Records are maintained with the SPCC Plan at the Ridgeview field office.

Date: _____ Signature: _____

	Yes	No	Description & Comments (Note tank/equipment ID)
Storage tanks and Separation Equipment			
Tank surfaces show signs of leakage			
Tanks show signs of damage, rust, or deterioration			
Bolts, rivets or seams are damaged			
Aboveground tank supports are deteriorated or buckled			
Aboveground tank foundations have eroded or settled			
Gaskets are leaking			
Level gauges or alarms are inoperative			
Vents are obstructed			
Thief hatch and vent valve does not seal air tight			
Containment berm shows discoloration or stains			
Berm is breached or eroded or has vegetation			
Berm drainage valves are open/broken			
Tank area clear of trash and vegetation			
Equipment protectors, labels, or signs are missing			
Piping/Flowlines and Related Equipment			
Valve seals or gaskets are leaking.			
Pipelines or supports are damaged or deteriorated.			
Buried pipelines are exposed.			
Transfer equipment			
Loading/unloading lines are damaged or deteriorated.			
Connections are not capped or blank-flanged			
Secondary containment is damaged or stained			
Response Kit Inventory			
Discharge response material is missing or damaged or needs replacement			

Additional Remarks (attach sheet as needed):

APPENDIX C
Employee Training Log

Briefings will be scheduled and conducted by the facility owner or operator for operating personnel at regular intervals to ensure adequate understanding of this SPCC Plan. The briefings will also highlight and describe known discharge events or failures, malfunctioning components, and recently implemented precautionary measures and best practices. Personnel will also be instructed in operation and maintenance of equipment to prevent the discharge of oil, and in applicable pollution laws, rules, and regulations. Facility operators and other personnel will have an opportunity during the briefings to share recommendations concerning health, safety, and environmental issues encountered during facility operations.

Date	Subject Covered	Employees In Attendance	Instructor(s)

APPENDIX D - SPCC Plan Amendments and Certification

SPCC Plan Amendment No. _____

Amendment Description:

PROFESSIONAL ENGINEER CERTIFICATION

CERTIFICATION: I hereby certify that I have examined the facility and, being familiar with the provisions of 40 CFR Part 112, attest that this SPCC Plan Amendment has been prepared in accordance with good engineering practices.

Engineer: _____

Florida Registration Number: _____

Signature: _____

Date of Amendment No. 1 _____

SPILL PREVENTION, CONTROL AND COUNTERMEASURE PLAN MANAGEMENT APPROVAL

This SPCC plan Amendment is fully approved by the management of Universal Environmental Solutions, LLC and has been implemented as described herein.

_____ _____

Ed Kinley, President Date

SPILL PREVENTION, CONTROL AND COUNTERMEASURE PLAN COMPLIANCE REVIEW PAGE

SPCC Certification Log

In accordance with 40 CFR 112.5(b), a review and evaluation of this SPCC Plan is conducted at least once every five years. These reviews and evaluations are recorded below:

Reviewer (signature)	Reviewer (print)	Date	Comments	Is P.E. re-certification required? Yes or No
1.				
2.				
3.				
4.				
5.				
6.				
7.				
8.				
9.				
10.				

APPENDIX E: Discharge Prevention Briefing Log

Date	Type of Briefing	Instructor(s)
12/5/2003	Scheduled refresher. All field personnel.	Helena Berry, Optimal H&S Inc.
11/25/2004	Scheduled refresher. All field personnel.	Bill Laurier

APPENDIX F: Discharge Notification Procedures

Circumstances, instructions, and phone numbers for reporting a discharge to the National Response Center and other federal, state, and local agencies, and to other affected parties, are provided below. They are also posted at the facility in the storage shed containing the discharge response equipment. Note that any discharge to water must be reported immediately to the National Response Center.

Owner / Operator (Ed Kinley) (813) 390 - 0659

Local Emergency (fire, explosion, or other hazards) 911

Agency / Organization	Agency Contact	Circumstances	When to Notify
Federal Agencies			
National Response Center	1-800-424-8802	Discharge reaching navigable waters.	**Immediately (verbal)**
EPA Region IV (Hotline)	1-404-562-8700 (24 Hours)		**Immediately (verbal)**
EPA Region VI Regional Administrator	61 Forsyth Street, SW Atlanta, GA. 30303	Discharge 1,000 gallons or more; or second discharge of 42 gallons or more over a 12-month period.	Written notification within 60 days (see Section 2.1 of this Plan)
State Agencies			
State Warning Point	1-877-272-8335 (24 Hours)	1) Injury requiring hospitalization or fatality. 2) Fire, explosion, or other impact that could affect public safety. 3) Release exceeding 24-hour reportable quantity. 4) Impact to areas beyond the facility's confines.	**Immediately (verbal)** Written notification to be made within 5 days.
Fish & Wildlife Services	1-904-731-3336	Discharges that pose emergency conditions, regardless of the volume discharged.	**Within 1 hour** of discovery (verbal). Written notification within 7 working days.
FDEP Office of ER	1-850-245-2010	Petroleum discharges that exceed 25 Gallons	Within 24 hours of discovery (verbal). Written notification within 7 working days.
Others			
Response/cleanup contractors	SWS First Response	Any discharge that exceeds the capacity of facility personnel to	As needed

The person reporting the discharge must provide the following information:

- Name, location, organization, and telephone number;
- Name and address of the owner/operator;
- Date and time of the incident;
- Location of the incident;
- Source and cause of discharge;
- Types of material(s) discharged;
- Total quantity of materials discharged;
- Quantity discharged in harmful quantity (to navigable waters or adjoining shorelines);
- Danger or threat posed by the release or discharge;
- Description of all affected media (e.g., water, soil);
- Number and types of injuries (if any) and damaged caused;
- Weather conditions;
- Actions used to stop, remove, and mitigate effects of the discharge;
- Whether an evacuation is needed;
- Name of individuals and/or organizations contacted; and
- Any other information that may help emergency personnel respond to the incident.

Whenever the facility discharges more than 1,000 gallons of oil in a single event, or discharges more than 42 gallons of oil in each of two discharge incidents within a 12-month period, the Manager of Field Operations must provide the following information to the U.S. Environmental Protection Agency's Regional Administrator within 60 days:

- Name of the facility;
- Name of the owner or operator;
- Location of the facility;
- Maximum storage or handling capacity and normal daily throughput;
- Corrective actions and countermeasures taken, including a description of equipment repairs and replacements;
- Description of facility, including maps, flow diagrams, and topographical maps;
- Cause of the discharge(s) to navigable waters, including a failure analysis of the system and subsystems in which the failure occurred;
- Additional preventive measures taken or contemplated to minimize possibility of recurrence; and
- Other pertinent information requested by the Regional Administrator.

Discharge Notification Form

*** Notification must not be delayed if information or individuals are not available.

Facility: Universal Environmental Solutions, LLC / 1650 Hemlock Street / Tampa, FL. 33605

Description of Discharge		
Date/time	Release date: Release time: Duration:	Discovery date: Discovery time:
Reporting Individual	Name: Tel. #:	
Location of discharge	Latitude: Longitude:	Description:
Equipment source	Piping Valve Pump Unknown stock, flare	Description: Equipment ID:
Product	Used Oil Oily bilge water PCW * Other	* Describe other:
Appearance and description		
Environmental conditions	Wind direction: Wind speed:	Rainfall: Current:
Impacts		
Quantity	Released:	Recovered:
Receiving medium	Water** Land other (describe):	Release confined to company property. Release outside company property. ** If water, indicate extent and body of water:
Describe circumstances of the release		
Assessment of impacts and remedial actions		
Disposal method for recovered material		
Action taken to prevent incident from reoccurring		
Safety issues	Injuries Fatalities Evacuation	

Notifications		
Agency	**Name**	**Date/time reported & Comments**
Company Spill Response Coordinator (Ed Kinley)		
National Response Center 1-800-424-8802		
State Warning Point		
FDEP Bureau of ER		
Oil spill removal organization/cleanup contractor (SWS)		

APPENDIX G: Equipment Shut-off Procedures

Source	Action
DAF / Treatment System transfer pumps or hose failure	Shut in the pumps off at the pump locally or from the PLC panel located inside of the building. Shut off transfer pumps.
Tank overflow	Shut in the supply valves from the unloading / loading areas. Shut down DAF treatment system at the PLC panel.
Tank failure	Shut down the DAF treatment system and pumps at the PLC panel, close all supply valves to the tank.
Flowline rupture	Shut down the DAF treatment system and pumps at the PLC panel, close all supply valves to the tank.
Flowline leak	Shut down the DAF treatment system and pumps at the PLC panel, close all supply valves to the tank.
Explosion or fire	Immediately evacuate personnel from the area until the danger is over. Immediately Shut down the DAF treatment system and pumps at the PLC panel, close all supply valves to the tank.

APPENDIX H: Written Commitment of Manpower, Equipment, and Materials

In addition to implementing the preventive measures described in this Plan, UES will also specifically:

- In the event of a discharge:
- Make available all trained field personnel (three employees) to perform response actions
- Obtain assistance from an additional three full-time employees from its main operations contractor (Avonlea Services)
- Collaborate fully with local, state, and federal authorities on response and cleanup operations
- Maintain all on-site oil spill control equipment described in this Plan and in the attached Oil Spill Contingency Plan. The equipment is estimated to contain oil spills of up to 500 gallons.
- Maintain all communications equipment in operating condition at all times.
- Ensure that staging areas to be used in the event of a discharge to Sparkman Channel are accessible by field vehicles.
- Review the adequacy of on-site and third-party response capacity with pre-established response/cleanup contractors on an annual basis and update response/cleanup contractor list as necessary.
- Maintain formal agreements/contracts with response and cleanup contractors who will provide assistance in responding to an oil discharge and/or completing cleanup (see contract agreements maintained separately at the Ridgeview field office and lists of associated equipment and response contractor personnel capabilities).

APPENDIX I: Oil Spill Contingency Plan

The oil spill contingency plan is maintained separately at the Ridgeview field office.

[Refer to the sample Contingency Plan also available from EPA for more information on the content and format of that Plan]

ATTACHMENT 9 – UNIT MANAGEMENT PLAN

9.0 Unit Management Plan for Used Oil Tanks

This attachment describes the management, Inspection and certification of used oil process and storage tanks. Tanks that do not process used oils or have used oil storage are covered under Attachment 9 SPCC Plan of the permit submission.

9.1 Unit Description for Tanks

The UES Pre-Treatment Facility is located on an acre parcel of land, adjacent to the Sparkman Channel. The property is shared with other firms conducting various ship repair and maintenance activities. A Site map has been included in **9.6 Figure 1 Tank Location Map** and shows the UES Facility Operations and limits of operations. The UES facility operates Monday through Friday (weekends on occasion), 10 hours per day to treat bilge oily water. Bilge Oily water at the facility is primarily processed through and stored in Three 69,115 gallon tanks (Tanks #1-#3), and one 60,318 gallon tank (Tank #4). The used recovered oil from process is collected in a 10,000 gallon polyethylene tank (Tank #5). The used and virgin diesel fuel is stored in two steel 5,000 gallon tanks (Tank#6 and Tank#7), and the used and virgin gasoline is stored in one steel 5,000 gallon tank (Tank #8). Tanks #1 - #8 are located within the containment area north of the facility treatment building. Tanks # 1 through 4 are considered flow through structures and exempt under 40 CFR

The containment area is an impervious concrete structure that provides containment around tanks #1 - #8 which contain the bilge oily water, recovered waste oils, and used and virgin fuels, and PCW as showed in **Section 9.6 Figure 3**. The Containment pad is 85.34’ x 77.91’ x 2’6” with a capacity of 125,000 gallons. It has sufficient freeboard to allow for precipitation (15% or 4” for the 25 year and 50 year rain events). The expansion joints are filled with an impervious two part epoxy resin. Concrete sheet flow is directed to the collection sump in the tank farm. All rain water and spilled materials are collected and pumped back through the Pre-Treatment system for disposal to the POTW. Rain water is not authorized to return to ground level. Surface drainage is engineered so spilled materials inside the containment area of the tank farm will drain to a low point collection sump for return to storage tank farm and pre-treatment process.

The interior of the building contains the DAF containment area. The DAF containment area floor has a one foot high containment wall around the surrounding all plant operations that involve impacted bilge oily water. The pre-treatment operation tanks have a total capacity of 9,000 gallons. The DAF Containment area has an 11,250 gallon capacity. The following process tanks (tanks #9 - #15) are housed within the DAF containment area inside of the building inside containment area and are not exposed to rainwater:

Tank #9 – Steel DAF Treatment Vessel 3,000 gallon Bilge Oily Water.

Tank #10 – Steel Sludge Decant Tank 1,000 gallon Bilge Oily Water.

Tank #11 – Polyethylene Slop Tank 1,000 gallon Bilge Oily Water.

9.2 Inspection, Testing and Monitoring Schedules

Weekly inspections of the bilge oily water tanks, recovered waste oil tank, used and virgin fuel tanks, system effluent tank, sodium hydroxide tank, flocculent tank, and coagulant tank will be recorded in the form included in this document under **Section 6.3** Inspection and Maintenance Forms and maintained as

part of Appendix E. Integrity testing of the 5,000 gallon fuel tanks and associated supports/foundation are to be conducted every 10 years or after any tank repairs, in addition to routine visual inspections, as required by 40 CFR 112.8(c)(6). The container testing will include a technique such as hydrostatic testing, radiographic testing, ultrasonic testing, acoustic emissions testing, or another system of non-destructive shell testing. Normal business records of the integrity testing will be maintained at the facility.

Spill kits are located at the facility, which include "oil dry" and absorbent pads. Additionally, the company has 500' of oil response boon ready for immediate deployment if any catastrophic spill happens. These inventories are checked monthly to replenish any used materials.

The facility maintains an SPCC Plan for the Pretreatment Facility that is included in UES permit submission as **Attachment** 6. Records associated with the SPCC training will be kept with training files for the Emergency Spill Response Team.

9.3 Tank Certification

Used oil is stored in a 10,000 gallon polypropylene tank, four process flow through tanks on the containment pad are used for processing of the oily water waste the tank containment pad outside. Used fuels are stored in 3-5,000 gallon tanks on the tank containment pad outside. The storage tanks are identified above as Tank #6, #7 and #8. Four process tanks are designed to handle process flow.

The 10,000 gallon polypropylene tank designed for used oil storage has not been registered due to materials of construction. An exemption request is to be prepared and submitted to the Storage Tanks division of storage tanks the Florida Department of Environmental Protection. A copy of the exemption request is included in this attachment (January 20, 2015) This section is to be completed by October 20, 2014. A copy of the exemption letter and the PE certification for the four process tanks will be included. Attached below is the Exemption request form 62-620.910(17) FAC.

.

9.4 Forms

The following forms are utilized to track maintain and track storage tanks onsite. The forms are filled out by the plant operator and record of the inspections are kept onsite and at the uES office. A copy of the tank tabkle is included that is checked monthly and updated as needed.

9.4.1 Monthly Tank and Piping Inspection Form

Universal Environmental Solutions, LLC
Pre-Treatment Facility
Tampa Florida

Appendix E Monthly Tank/ Piping Inspection Form

Tank Number and Capacity	Contents	Description	STORAGE TANKS: TANK SURFACE SHOW SIGNS OF LEAKAGE	TANKS ARE DAMAGED, RUSTED OR DETERIORATED	BOLTS, RIVETS, OR SEAMS ARE DAMAGED	TANK SUPPORTS ARE DETERIORATED OR BUCKLED	TANK FOUNDATIONS HAVE ERODED OR SETTLED	LEVEL GAUGES OR ALAMRS ARE INOPERATIVE	VENTS ARE OBSTRUCTED	SECONDARY CONTAINMENT IS DAMAGED OR STRAINED	WATER/PRODUCT IN INTERSTICE OF DOUBLE-WALLED TANK	DIKE DRAINAGE VALVE IS OPEN OR IS NOT LOCKED	Piping: VALVE SEALS, GASKETS, OR OTHER APPURTENANCES ARE LEAKING	PIPELINES OR SUPPORTS ARE DAMAGED OR DETERIORATED	JOINTS, VALVES AND OTHER APPURTENANCES ARE LEAKING	BURIED PIPE IS EXPOSED	Loading/Unloading and Transfer Equipment: LOADING/UNLOADING RACK IS DAMAGED OR DETERIORATED	CONNECTIONS ARE NOT CAPPED OR BLANK-FLANGED SECONDARY CONTAINMENTCONTAINMENT IS DAMAGED OR STRAINED	BERM DRAINAGE VALVE IS OPEN OR IS NOT LOCKED	Oil Water Seperator: OIL/WATER SEPERATOR OR >2 INCHES OF ACCUMULATED OIL ON WATER SEPERATOR EFFLUENT HAS A SHEEN	Security: FENCING, GATES, OR LIGHTING IN NON-FUNCTIONAL	PUMPS AND VALVES ARE LOCKED IF NOT IN USE	Response Equipment: RESPONSE EQUIPMENT INVENTORY IS COMPLETE
Bilge Oily Water / PCW Tanks																							
Tank # 1 69,115 gallons	Bilge Oily Water and PCW	Aboveground Horziontal Flat Botton Tanks																					
Tank #2 69,115 gallons	Bilge Oily Water and PCW	Aboveground Horziontal Flat Botton Tanks																					
Tank # 3 69,115 gallons	Bilge Oily Water and PCW	Aboveground Horziontal Flat Botton Tanks																					
Tank #4 60,318 gallons	Bilge Oily Water and PCW	Aboveground Horziontal Flat Botton Tanks																					
Polyehylene Recovered Used Oil Storage Tank																							
Tank #5 10,000 gallons	Recovered Used Oil	Aboveground Vertical Tank																					
Used and Virgin Fuel Tanks																							
Tank # 6 5,000 gallons	Used and Virgin Diesel Fuel	Aboveground Vertical Tank																					
Tank # 7 5,000 gallon Diesel	Used and Virgin Diesel Fuel	Aboveground Vertical Tank																					
Tank # 8 5,000 gallon Gasoline	Used and Virgin Gasoline	Aboveground Vertical Tank																					
Fixed Storage (Pre-Treatment Facility Interior)																							
Tank #9 DAF 3,000 gallons	Bilge Oily Water	Aboveground Horziontal Tank Elevated on Concrete Pedistales																					
Tank # 10 1,000 gallons	Bilge Oily Water	Aboveground Horziontal Tank																					
Tank #11 1,000 gallons	Bilge Oily Water	Aboveground Vertical Tank																					
Tank #12 1,000 gallons	Bilge Oily Water	Aboveground Vertical Tank																					
Tank #13 1,000 gallons	Sodium Hydroxide	Aboveground Vertical Tank																					
Tank #14 1,500 gallons	Flocculent	Aboveground Vertical Tank																					
Tank #15 1,000 gallons	Coagulant	Aboveground Vertical Tank																					
Tank #16 22 yard	Sludge Oily Waste	Sealed Roll-Off Tank																					
Frack Tanks																							
Frack Tank # 1 20,000 gallons	Bilge Oily Water	Frac Tank (Temporary)																					
Frack Tank # 2 20,000 gallons	Bilge Oily Water	Frac Tank (Temporary)																					
Frack Tank # 3 20,000 gallons	Bilge Oily Water	Frac Tank (Temporary)																					
Frack Tank # 4 20,000 gallons	Bilge Oily Water	Frac Tank (Temporary)																					

Deficiencies Noted:	Action Taken:	Expected Date Of Repair:

Certification: Inspection has been preformed in a manner coc sisent with the requirements of Part 613.6:

Inspectors Name (Printed)	Date:	
Inspectors Name (Signed)	Date:	

Appendix E Weekly Tank Inspection Form REV 1 — 1 of 1 — 1/30/2015

9.4.2 Weekly Tank Checklist

Universal Environmental Solutions, LLC

Universal Environmental Solutions, LLC
Pre-Treatment Facility
Tampa Florida

Document Title

Appendix B Weekly Check List

Date: _____
Time: _____
Weather conditions: _____
Inspector:

X = Satisfactory
NA = Not Applicable
O = Repair or Adjustment
C = Comment under Remarks/Recommendations

Inspection Line item	Result of Inspection	Remarks/Recommendations
Tank Farm Containment Area		
Any Noticeable oil sheen on runoff		
Containment area drainage valves closed and locked		
Treatment system working properly		
Effluent from system inspected		
No visible oil sheen in containment area		
No standing water in containment area		
Valves in working order		
Sump free of bilge oily water		
Above Ground Storage Tanks (AST's)		
Tank condition{good, no rust, corrosion, pitting}		
Bolts, Rivits, or seams not damaged		
Tank Foundation intact		
Level gauges and alarms working properly		
Any obstructions		
Valves, flanges, and gaskets free from leaks		
Containment walls intact		
Tank and ground surfaces checked for signs of leakage		
Conduct annual leak Test (Next Test Due_____)		
DAF Treatment System		
Inspect for the presence of oil in oil section		
Any obstructions		
Valves, flanges, and gaskets free from leaks		
Tank and ground surfaces checked for signs of leakage		
Hydraulic skimmer motor and skimmer in good condition		
Bolts, Rivits, or seams not damaged		
Pipes		
Buried Pipelins not exposed		
Out of service pipes capped		
Manways opened to detect prence of bilge oily water		
No leaks at valves, flanges, or fittings		
No sign of corrosion damage to pipelines, supports, brackets		
Truck Loading/Unloading Areas		
Warning signs posted		
Truck hoses free of leaks		
Connection / manifold boxes free of liquids		
Connection are capped if not in use		
Valves in working order and shut when not in use		
Security		
Gates have locks in working order		
AST's locked when not in use		
Starter controls for pumps locked when not in use		
Lighting is working properly		
Fences and gates intact		
Training		
Training records are in order (Monthly Check)		
Spill prevention brefing held (Monthly Check)		
Miscellaneous Monthly		
Spill kits inventory replenishment		
First aid kits replenishment		

9.4.2 Tank Table

Universal Environmental Solutions, LLC
Pre-Treatment Facility
Tampa Florida

USED OIL TANK TABLE

TANK NUMBER AND CAPACITY	LOCATION	TYPE (CONSTRUCTION STANDARD)	CONTENT	DISCHARGE PREVENTION & CONTAINMENT
Bilge Oily Water / PCW Tanks				
Tank #1 69,115 gallons	TANK CONTAINMENT PAD AREA	Aboveground Horziontal Flat Botton Tanks (UL142)	Bilge Oily Water and PCW	Concrete Containment / liquid level gauges
Tank #2 69,115 gallons	TANK CONTAINMENT PAD AREA	Aboveground Horziontal Flat Botton Tanks	Bilge Oily Water and PCW	Concrete Containment / liquid level gauges
Tank #3 69,115 gallons	TANK CONTAINMENT PAD AREA	Aboveground Horziontal Flat Botton Tanks	Bilge Oily Water and PCW	Concrete Containment / liquid level gauges
Tank #4 60,318 gallons	TANK CONTAINMENT PAD AREA	Aboveground Horziontal Flat Botton Tanks	Bilge Oily Water and PCW	Concrete Containment / liquid level gauges
Polyehylene Recovered Used Oil Storage Tank				
Tank #5 10,000 gallons	TANK CONTAINMENT PAD AREA	Aboveground Vertical Tank	Recovered Used Oil	Concrete Containment / liquid level gauges
Used and Virgin Fuel Tanks				
Tank #6 5,000 gallons	TANK CONTAINMENT PAD AREA	Aboveground Vertical Tank	Used and Virgin Diesel Fuel	Concrete Containment / liquid level gauges
Tank #7 5,000 gallon Diesel	TANK CONTAINMENT PAD AREA	Aboveground Vertical Tank	Used and Virgin Diesel Fuel	Concrete Containment / liquid level gauges
Tank #8 5,000 gallon Gasoline	TANK CONTAINMENT PAD AREA	Aboveground Vertical Tank	Used and Virgin Gasoline	Concrete Containment / liquid level gauges
Fixed Storage (Pre-Treatment Facility Interior)				
Tank #9 DAF 3,000 gallons	PRE-TREATMENT BUILDING CONTAINMENT AREA	Aboveground Horziontal Tank Elevated on Concrete Pedistales	Bilge Oily Water	Inside Pre-Treatment Building / Concrete Containment
Tank # 10 1,000 gallons	PRE-TREATMENT BUILDING CONTAINMENT AREA	Aboveground Horziontal Tank	Bilge Oily Water	Inside Pre-Treatment Building / Concrete Containment
Tank #11 1,000 gallons	PRE-TREATMENT BUILDING CONTAINMENT AREA	Aboveground Vertical Tank	Bilge Oily Water	Inside Pre-Treatment Building / Concrete Containment
Tank #12 1,000 gallons	PRE-TREATMENT BUILDING CONTAINMENT AREA	Aboveground Vertical Tank	Bilge Oily Water	Inside Pre-Treatment Building / Concrete Containment
Tank #13 1,000 gallons	PRE-TREATMENT BUILDING CONTAINMENT AREA	Aboveground Vertical Tank	Sodium Hydroxide	Inside Pre-Treatment Building / Concrete Containment
Tank #14 1,500 gallons	PRE-TREATMENT BUILDING CONTAINMENT AREA	Aboveground Vertical Tank	Flocculent	Inside Pre-Treatment Building / Concrete Containment
Tank #15 1,000 gallons	PRE-TREATMENT BUILDING CONTAINMENT AREA	Aboveground Vertical Tank	Coagulant	Inside Pre-Treatment Building / Concrete Containment
Tank #16 22 yard	ROLL-OFF PAD CONTAINMENT AREA	Sealed Roll-Off Tank	Sludge Oily Waste	Inside Pre-Treatment Building / Concrete Containment
Frack Tanks				
Frack Tank # 1 20,000 gallons	FRAC TANK CONTAINMENT AREA	Frac Tank (Temporary)	Bilge Oily Water	Concrete Containment
Frack Tank # 2 20,000 gallons	FRAC TANK CONTAINMENT AREA	Frac Tank (Temporary)	Bilge Oily Water	Concrete Containment
Frack Tank # 3 20,000 gallons	FRAC TANK CONTAINMENT AREA	Frac Tank (Temporary)	Bilge Oily Water	Concrete Containment
Frack Tank # 4 20,000 gallons	FRAC TANK CONTAINMENT AREA	Frac Tank (Temporary)	Bilge Oily Water	Concrete Containment

9.5 Tank Certification

To comply with the requirements of the permit and 62-762 all tanks within the facility containment area over 550 gallons must meet standards detailed in the Approved Equipment List 62-762.500 FAC. Tank inspection forms have been implemented in December 2014. Records of inspection are maintained in laboratory and UES office.

9.5.1 Tank Certification – PCW Tanks

FLORIDA DEPARTMENT OF ENVIRONMENTAL PROTECTION
STORAGE TANK REGISTRATION PLACARD
2014-2015

STCM ACCOUNT: 70300
FACILITY ID: 9814309
FACILITY: UNIVERSAL ENVIRONMENTAL SOLUTIONS
1650 HEMLOCK ST
TAMPA FL 33605 HILLSBOROUGH COUNTY
FACILITY TYPE: Industrial Plant

PLACARD NO: 448303
PLACARD ISSUED: 09/19/2014
PLACARD EXPIRES: 06/30/2015
TANK SYSTEMS REGISTERED: 3

ACCOUNT OWNER: UNIVERSAL ENVIRO SOLUTIONS
1650 HEMLOCK ST
TAMPA FL 33605

HASH: TLWYM6QLMMW6Q6

The Storage Tank Registration placard must be posted at the facility.
It must be placed out of the weather and in plain view of inspectors entering the facility.

Under Section 376.3077, Florida Statutes, it is unlawful to deposit motor fuel into a stationary storage tank system that requires registration unless proof of valid registration is displayed at the facility.

Acceptance of this placard constitutes agreement to operate the registered tanks in compliance with applicable Statutes and Department Rules.

DEPARTMENT OF ENVIRONMENTAL PROTECTION IS ON THE INTERNET

The Web address for DEP is http://www.dep.state.fl.us

You can access the Storage Tank Website by using http//www.dep.state.fl.us/waste/categories/tanks.
Look under the HIGHLIGHTS section to find the links to storage tank rules, forms, database reports and program information.

CONTACT TANK REGISTRATION BY:

EMAIL - TankRegistration@dep.state.fl.us
PHONE - (850) 245-8839

9.5.2 Recovered Oil Tank Exemption Application

UNIVERSAL ENVIRONMENTAL SOLUTIONS

Letter of Transmittal

To:	Mr. John Svec F.D.E.P. MS #4500 2600 Blair Stone Road, Tallahassee, Fl 32399-2400	Date: File:	February 2, 2015 Alternative Equipment Approval Request Universal Environmental Solutions, LLC Oil Processing Facility Polypropylene Tank

Enclosed please find:
_X_herewith ___under separate cover: ___drawings ___descriptive literature ___letters

If all information listed is not received, please contact us immediately.

Quantity	Title	Comments
1 PDF (Electronic)	Alternative Equipment Approval Request Universal Environmental Solutions, LLC – DEP ID #FLR000199802 Revision 0, October 2014	Y

*Comment letter code:
R-Reviewed **N**-Reviewed and Noted **I**-For your Information **Y**-For your approval

The attached Alternative Equipment Approval Request for the Universal Environmental Solutions (UES) site is being submitted for your review and approval.

Regards,

Ed Kinley,
President

DISTRIBUTION:

Bheem Kothur (FDEP)
Keith Coats (P.E.)
Jim Seavy (Consultant)

P.O. Box 76105, Tampa, FL 33675 ~ Phone (813) 241-9206 ~ Fax (813) 241-9215

UNIVERSAL ENVIRONMENTAL SOLUTIONS

February 2, 2015

Mr. John Svec

F.D.E.P.
MS #4500
2600 Blairstone Road
Tallahassee, FL. 32399

Re: Alternative Equipment Approval Request - UES Oil Processing Facility 10K Polypropylene Tank Use

Dear Mr. Svec:

This letter is being submitted to request a variance above ground storage tank at the UES bilge oily water processing facility located at 1650 Hemlock St Tampa FL. UES has constructed a process facility that is design to pretreat non-hazardous oily water wastes from barge cleaning operations and petroleum contact waters produced from industrial activities. To comply with the requirements of the permit and 62-762 all tank within the facility containment area over 550 gallons must meet standards detailed in the Approved Equipment List 62-762.500 FAC and the Approved Equipment list for above ground storage tanks.

The process utilized at the facility to pretreat the oily water wastes generated is dissolved air floatation (DAF). The DAF system uses sodium hydroxide, sulfuric acid and sodium hypochlorite dosing to separate the emulsified oils from the wastewater and neutralization the wastewater prior to disposal. Three waste streams are created during the process; wastewater which is disposed to the local POTW, sludge waste which is collected in a sealed roll-off onsite and used non-hazardous waste oil which is presently collected in a 10K polyethylene tank located within the 125,000 gallon tank containment pad. Tank location has been provided on site map. The waste/used oils contain small amounts of the process chemicals and can be stored onsite for up to a year before quantities are great enough for recycling pickups. The waste/used oil stored contains trace amounts of dosing chemicals.

Design and selection of the waste/used oil tank incorporated the use of the pretreatment dosing chemicals. The selection of the standard steel tanks were deemed unsafe due to the effects of the chemicals store most effective material utilized for long term storage of waste/used oils with trace amounts of sodium Hydroxide, sulfuric acid. The selection for a polypropylene was based on the attached materials of compatibility chart, know used oils containment designs and best management practices. The polypropylene tank and design provided the safest and most effective long term storage capabilities for the storage of waste/used oils with trace amounts of sodium Hydroxide, sulfuric acid.

A Florida State certified P.E. certification recommending the combination of these waste/used oil and dosing chemicals and use for long term storage of these recycled waste/oils from the pretreatment process is attached below. UES would like to request a variance under 62-762-851 FAC to utilize the polypropylene instead of the recommended steel or fiberglass tanks approved by the agency.

P.O. Box 76105, Tampa, FL 33675 ~ Phone (813) 241-9206 ~ Fax (813) 241-9215

UNIVERSAL ENVIRONMENTAL SOLUTIONS

The polypropylene tank has been equipped with an overflow alarm and anti siphon valve and is housed within a secondary containment area capable of containing more than 100% of the 10,000 gallon capacity. The above ground polypropylene tank complies with all other tank requirements detailed under rules 62.760 and 62.762 FAC.

Kindest Regards,

E. Kinley

Ed Kinley

President

Attachments:

P.E. Certification

Site Map

Material Compatibility

P.O. Box 76105, Tampa, FL 33675 ~ Phone (813) 241-9206 ~ Fax (813) 241-9215

UNIVERSAL ENVIRONMENTAL SOLUTIONS

POLYPROETHYLENE STORAGE TANK USE CERTIFICATION FOR WASTE/USED OIL AND DOSING CHEMICALS APPROVAL

I hereby certify under penalty of law that I have examined the facility 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. To the best of my knowledge and belief, the information contained in this plan is true, complete, and accurate. Further, I attest that this plan has been prepared in accordance with good engineering practices.

Michael Keith Coats, P.E. *FL PE No.48917*

Professional Engineer

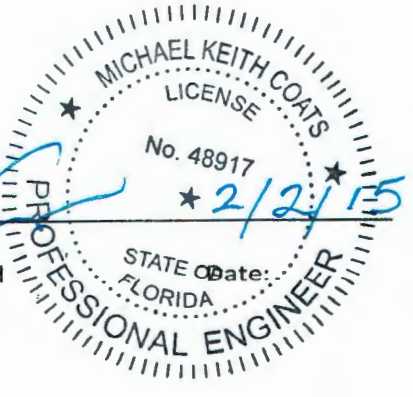
Seavy & Associates, Inc.

Certificate of Authorization # 9528

2608 South 86th St. Ste B

Tampa, Florida 33619

813-917-9267



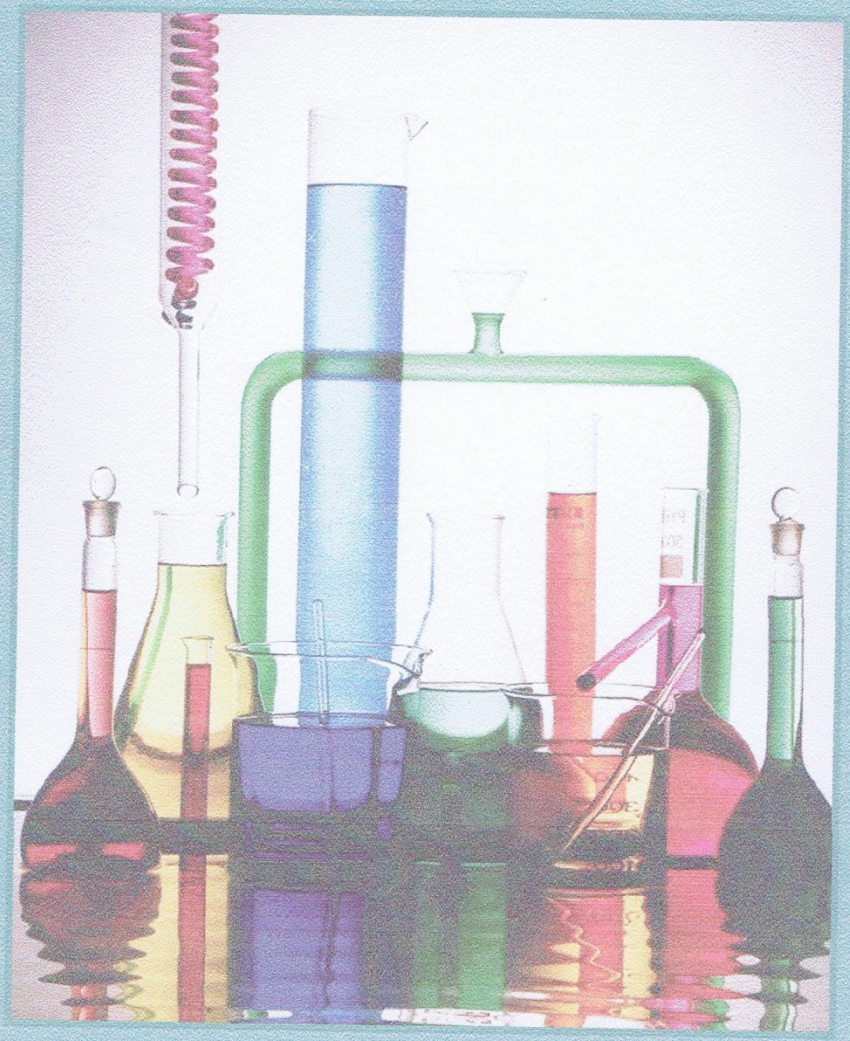
2/2/15

Signature of Registered Professional Engineer Date:

Your Pipeline To Quality

Chemline

Chemical Resistance Guide



CHEMLINE
Plastics Limited

Materials of Construction

CHEMLINE Plastics Limited

Thermoplastics

PVC (Polyvinyl Chloride)

The most economical and largest selection of Chemline valves are moulded from PVC. It offers excellent mechanical and chemical resistance properties at low cost. The working temperature range of PVC valves is **0 to 60°C (30 to 140°F)**.

PVC used for Chemline valves is identified by cell classification number **11564-A** as per ASTM Standard D 1784. The suffix **"A"** refers to the highest chemical resistance rating. Most other PVC valves as well as pipe and fittings have only a "B" chemical resistance rating.

The special PVC "A" compound used in Chemline valves resists attack of most acids, strong alkalais, salts and many other chemicals. High chemical resistance of this material allows its application on aggressive services such as 98% H_2SO_4, dry chlorine and low pressure wet chlorine gas. PVC is attacked by chlorinated hydrocarbons, ketones, esters and some aromatic compounds. It can be used on solutions containing up to 1000 ppm solvents.

Chemline PVC valves are non-toxic. They meet CSA standard B137.0 for toxicity.

They are resistant to damaging effects of sunlight and weathering, thus painting is not necessary.

CPVC (Chlorinated Polyvinyl Chloride)

CPVC is very similar to PVC in mechanical properties and chemical resistance. It is suitable for applications from **0 to 95°C (30 to 200°F)**.

The special CPVC compound used for Chemline valves is classified as **23567-A** as per ASTM D 1784. The suffix "A" denotes conformance to the highest chemical resistance rating. The compound is non-toxic, conforming to CSA toxicity standard B137.0.

CPVC valves have proven to be an excellent choice for applications at temperatures too high for PVC or when an extra margin of safety is required.

PP (Polypropylene)

PP is light weight and high in chemical resistance. Valves are suitable for service from **-20 to 90°C (-5° to 195°F)**. PP is unaffected by alkalais, salts, organic solvents and most acids, particularly hydrochloric and phosphoric acid. It is unsuitable on strong acids, chlorinated hydrocarbons, aromatic compounds and high concentrations of free chlorine.

PP is very inert thus popular for high purity applications such as deionized water, etc. The material comes normally opaqued by addition of grey-beige pigment to prevent ultraviolet light penetration. Natural translucent material without pigment will degrade if exposed to UV light (sun light). Chemline offers PP pipe, fittings and valves in pigmented and unpigmented PP, both approved by the FDA for contact with food.

PVDF (Polyvinylidene Fluoride)

PVDF is superior to other valve thermoplastics in chemical resistance and abrasion resistance. It has remarkable strength over the largest working temperature range.

The working temperature range of PVDF valves is **-40 to 120°C (-40 to 250°F)**.

PVDF's impact strength is over twice that of PVC. The valves are extremely durable under mechanical abuse even at -40°F. They also offer the highest abrasion resistance of thermoplastic valves.

PVDF has excellent chemical resistance against halogens such as chlorine and bromine, strong acids such as hydrofluoric and nitric acids, organic solvents and oils. PVDF is not resistant to hot bases.

It is also non toxic and imparts no odours or tastes into the fluid. Our PVDF conforms with USDA Title 21, P121.2593 requirements for contact with food.

Gas permeability of PVDF is extremely low. A patented PVDF gas permeability barrier is available on Type 14 and DV Series Diaphragm Valves. It is a backing to the Teflon® diaphragm and has proven to increase the life of diaphragm valves on chlorine and strong acid services.

Teflon® PTFE (Polytetrafluoroethylene)

PTFE is almost totally insoluble and chemically inert. It has high temperature resistance. Teflon® PTFE ball seats, because of natural lubricity, require no lubrication. Teflon® PTFE diaphragms and flange gaskets are used in the most severe chemical resistance applications.

Elastomers

EPDM (Ethylene Propylene Terpolymer)

EPDM is a synthetic rubber used as the standard seal material for most Chemline valves. It is the most economical choice of elastomer and has excellent chemical resistance on the great majority of applications including acids, alkalais, salts and many others at temperatures up to 90°C. EPDM is weak on organic compounds and cannot be used on oils and fats.

Chemline valves seals of EPDM meet CSA standard B137.0 for non-toxicity.

Viton® (Fluorocarbon Rubber, abv. FPM)

Viton® is more expensive than EPDM so is used as an alternate elastomer when required. It has excellent resistance to mineral acids, oils and many aliphatic and aromatic hydrocarbons. Viton® is weak on sodium hydroxide.

CPE (Chlorinated Polyethylene)

CPE is superior to all other elastomers on sodium hypochlorite. It resists hypochlorite up to full strength (13%). Ball valves supplied with CPE seals are very price competitive on this service.

NITRILE (Acrylonitrile-Butadiene Copolymer, abv. NBR)

Nitrile is also know as Buna-N. It has high chemical resistance to oil and petroleums but is weak on oxidizing media i.e. acids. Nitrile has excellent abrasion resistance and is less expensive than Viton® for butterfly valve seats.

Your Pipeline to Quality

Chemical Resistance

CHEMLINE Plastics Limited

Codes

- (A) **Excellent** = Recommended
- (B) **Good** = Recommended
- (C) **Fair** (limited life)
- (X) **Not Recommended**

Corrosion resistance data given in this publication are based on laboratory tests conducted by the manufacturers of the materials covered and are indicative only of the conditions under which the tests were made. The information may be considered as a basis for recommendation but not as a guarantee. Materials should be tested in actual service to determine suitability for a particular purpose.

Consult Chemline for ratings on other materials not shown in this book such as **Hypalon** or **Neoprene** seals, or **Polyamide** or **Polysulfone** flow meter tubes.

Chemical	Concentration (%)	Temp. °C	Temp. °F	PVC	CPVC	PP	PVDF	TEFLON	VITON	EPDM	NITRILE
Acetaldehyde CH_3CHO	Pure	20	68	X	X	A	X	A	C	A	X
		40	104			A		A	C	A	
		60	140			B		A	X	B	
		80	176					A			
		100	212					A			
		120	248					A			
Acetaldehyde (Aqueous) CH_3CHO	40	20	68	X	X	A	X	A	B	A	X
		40	104			A		A	B	A	
		60	140			A		A	C	A	
		80	176			B		A	X	B	
		100	212					A			
		120	248					A			
Acetamide CH_3CONH_2	Satu	20	68			A		A	A	A	A
		40	104					A	A	A	A
		60	140					A			
		80	176					A			
		100	212					A			
		120	248								
Acetic Acid CH_3COOH	10	20	68	A	A	A	A	A	B	A	B
		40	104	A	A	A	A	A	B	A	
		60	140	A	A	A	A	A	C	B	
		80	176		A	A	A	A	X		
		100	212				A	A			
		120	248				B	A			
Acetic Acid CH_3COOH	20	20	68	A	A	A	A	A	B	A	X
		40	104	A	A	A	A	A	C	A	
		60	140	A	B	A	A	A	C	B	
		80	176		C	B	B	A	X		
		100	212				B	A			
		120	248				B	A			
Acetic Acid CH_3COOH	50	20	68	A	A	A	A	A	C	B	X
		40	104	A	B	A	A	A	X		
		60	140	B	C	A	A	A			
		80	176		X		B	A			
		100	212				B	A			
		120	248					A			
Acetic Acid CH_3COOH	80	20	68	A	B	A	A	A	X	C	X
		40	104	B	C	A	A	A			
		60	140	C	X	C	B	A			
		80	176				C	A			
		100	212					A			
		120	248					A			
Acetic Acid (Glacial) CH_3COOH	99	20	68	X	X	A	A	A	X	X	X
		40	104			B	A	A			
		60	140			C	B	A			
		80	176					A			
		100	212					A			
		120	248					A			
Acetic Anhydride $(CH_3CO)_2O$	Pure	20	68	X	X	B	B	A	X	C	X
		40	104			C	C	A		X	
		60	140			X	X	A			
		80	176					A			
		100	212					A			
		120	248					A			
Acetone CH_3COCH_3	Pure	20	68	X	X	A	X	A	X	A	X
		40	104			A		A		B	
		60	140			C		A			
		80	176					A			
		100	212					A			
		120	248					A			
Acetone (Aqueous) CH_3COCH_3	10 ppm	20	68	A	A	A	A	A	A	A	B
		40	104	A	A	A	A	A	B	A	C
		60	140	B	B	A	A	A		A	
		80	176			A	B	A		B	
		100	212				B	A			
		120	248				B	A			
Acetonitrile CH_3CN		20	68			B	A	A		A	C
		40	104				A	A			
		60	140				C	A			
		80	176				X				
		100	212								
		120	248								
Acetophenone $C_6H_5COCH_3$		20	68			A	C	A	C	A	X
		40	104			B	C	A	X	A	
		60	140			C	X	A		A	
		80	176			X		A		B	
		100	212					A			
		120	248					A			
Acetyl Acetone $CH_3COCH_2COCH_3$		20	68	X	X		X	A			
		40	104					A			
		60	140					A			
		80	176								
		100	212								
		120	248								
Acetyl Bromide CH_3COBr		20	68				A	A			
		40	104				A	A			
		60	140				A	A			
		80	176				B	A			
		100	212					A			
		120	248					A			
Acetyl Chloride CH_3COCl		20	68			A	A	A	X	X	X
		40	104			A	B	A			
		60	140			C	C	A			
		80	176			X	X	A			
		100	212					A			
		120	248								
Acetylene C_2H_2		20	68	A	X	A	A	A	A	C	A
		40	104			A	A	A	A	C	A
		60	140			A	A	A	A	X	B
		80	176			B	A	A	A		
		100	212					A	B		
		120	248					B			

CHEMLINE Plastics Limited

Chemical	Concentration (%)	Temp. °C	Temp. °F	PVC	CPVC	PP	PVDF	TEFLON	VITON	EPDM	NITRILE
Nitroethane $CH_3CH_2NO_2$	Pure	20	68				A	A	X	A	X
		40	104					A			
		60	140					A			
		80	176					A			
		100	212								
		120	248								
Nitrogen Dioxide NO_2		20	68	A		A	A	A	A	A	A
		40	104				A	A			
		60	140				A	A			
		80	176				A	A			
		100	212					A			
		120	248					A			
Nitromethane CH_3NO_2	Pure	20	68				A	A		B	X
		40	104				A	A			
		60	140					A			
		80	176					A			
		100	212								
		120	248								
Nitrotoluene $C_6H_4CH_3NO_2$	Pure	20	68	X	X	A	A	A	C	X	C
		40	104			A	A	A			X
		60	140				A	A			
		80	176					A			
		100	212					A			
		120	248								
Nitrous Acid HNO_2	10	20	68			C	A	A	A	B	X
		40	104			X	A	A			
		60	140				A	A			
		80	176				A	A			
		100	212								
		120	248								
Nitrous Oxide N_2O		20	68	A		A	A	A	A	A	
		40	104	A		A	A	A	A	A	
		60	140	A		A	A	A	A	A	
		80	176			A	A	A	A	B	
		100	212				A	A	B		
		120	248				B	A	B		
Octane C_8H_{18}		20	68				A	A	A	X	A
		40	104				A	A			
		60	140				A	A			
		80	176				A	A			
		100	212				A	A			
		120	248				A	A			
Octene $CH_3(CH_2)_5CH=CH_2$	Pure	20	68				A	A	A	X	A
		40	104				A	A			
		60	140				A	A			
		80	176				A	A			
		100	212				A	A			
		120	248				A	A			
Oil - Heavy		20	68	B	B	X	A	A	B	X	B
		40	104				A	A	B		B
		60	140				A	A			
		80	176					A			
		100	212					A			
		120	248					A			
Oil - Light (Incl. Diesel Fuels)		20	68	A		A	A	A	A	X	A
		40	104				A	A	A		
		60	140				A	A	A		
		80	176				A	A			
		100	212				A	A			
		120	248					A			
Oil - Lubricating (ASTM 1)		20	68	A		B	A	A	A	X	A
		40	104	A		C	A	A	A		B
		60	140	A		X	A	A	A		
		80	176				A	A	A		
		100	212				A	A	A		
		120	248				A	A			

Chemical	Concentration (%)	Temp. °C	Temp. °F	PVC	CPVC	PP	PVDF	TEFLON	VITON	EPDM	NITRILE
Oil - Lubricating (ASTM 2 and 3)		20	68	A		B	A	A	A	X	A
		40	104	A		C	A	A	A		B
		60	140	A		X	A	A	A		
		80	176				A	A	A		
		100	212				A	A	B		
		120	248				A	A			
Oil - Sulfonated		20	68	A		A	A	A	A	A	A
		40	104								
		60	140								
		80	176								
		100	212								
		120	248								
Oil - Machine, Mineral, Motor		20	68	A		A	A	A	A	X	A
		40	104	A		B	A	A	A		A
		60	140	A		C	A	A	A		B
		80	176				A	A			
		100	212				A	A			
		120	248								
Oil - Petroleum (Crude Oil)		20	68	B		B	A	A	A	X	A
		40	104				A	A			
		60	140				A	A			
		80	176				A	A			
		100	212				A	A			
		120	248				A	A			
Oleic Acid $CH(CH_2)_7CH_3$ $\|\|$ $CH(CH_2)_7COOH$		20	68	A	B	A	A	A	A	X	X
		40	104	A	B	A	A	A	A		
		60	140	A	B	A	A	A	A		
		80	176			A	A	A	A		
		100	212				A	A	A		
		120	248				B	A	B		
Oleum (fuming sulphuric acid) $H_2SO_4+SO_3$		20	68	X	X	X	X	A	X	X	X
		40	104								
		60	140								
		80	176								
		100	212								
		120	248								
Olive Oil		20	68	A	A	A	A	A	A	B	A
		40	104	A	A	A	A	A	A		A
		60	140	A	A	A	A	A	A		A
		80	176		A	A	A	A	A		A
		100	212				A	A			
		120	248				A	A			
Organic Phosphorus Series Insecticide (Sumition®)		20	68	X	X	A	A	A	A	A	C
		40	104			A	A	A	A	A	
		60	140			B	A	A	A	A	
		80	176				A	A			
		100	212				B	A			
		120	248				B	A			
Oxalic Acid HOOCCOOH	20	20	68	A	A	A	A	A	B	A	B
		40	104	A	A	A	A	A		A	
		60	140	A	A	A	A	A			
		80	176		A	A	B	A			
		100	212				C	A			
		120	248					A			
Oxalic Acid HOOCCOOH	50	20	68	A	A	A	A	A	B	A	B
		40	104	A	A	A	A	A		A	
		60	140	A	A	A	B	A			
		80	176		A	A	C	A			
		100	212					A			
		120	248					A			
Oxygen Gas O_2		20	68	A	A	A	A	A	A	A	B
		40	104	A			A	A	A	A	
		60	140	A			A	A	A	A	
		80	176				A	A	A	A	
		100	212					A			
		120	248					A			

CHEMLINE Plastics Limited

Chemical	Concentration (%)	Temp. °C	Temp. °F	PVC	CPVC	PP	PVDF	TEFLON	VITON	EPDM	
Sodium Hydroxide (Caustic Soda) NaOH	50	20	68	A	B	A	A	A	X	A	CPE
		40	104	A	B	A	B	A		A	
		60	140	A	C	A	C	A		A	
		80	176		X	A	X	A		A	
		100	212					A			
		120	248					A			
Sodium Hypochlorite (Bleach) NaOCl	3	20	68	A	A	B	A*	A	A	B	A
		40	104	A	A	B	A*	A	B	B	A
		60	140	B	B	B	A*	A	C	C	A
		80	176								B
		100	212								
		120	248								
Sodium Hypochlorite (Bleach) NaOCl	5	20	68	A	A	B	A*	A	A	B	A
		40	104	A	A	B	A*	A	B	B	A
		60	140	B	B	C	B*	A	C	C	A
		80	176								B
		100	212								
		120	248								
Sodium Hypochlorite (Bleach) NaOCl	7	20	68	A	A	B	A*	A	A	B	A
		40	104	A	A	C	A*	A	B	C	A
		60	140	B	B	C	B*	A	C	C	B
		80	176								C
		100	212								X
		120	248								
Sodium Hypochlorite (Bleach) NaOCl	10	20	68	A	A	B	A*	A	A	X	A
		40	104	A	A	C	A*	A			B
		60	140	B	B	C	B*	A			B
		80	176								C
		100	212								X
		120	248								
Sodium Hypochlorite (Bleach) NaOCl	13	20	68	A	A	B	A*	A	A	X	A
		40	104	A	A	C	A*	A			B
		60	140	B	B		B*	A			C
		80	176								X
		100	212								
		120	248								
Sodium Iodide NaI		20	68	A		A	A	A	A	A	NITRILE
		40	104	A		A	A	A	A	A	
		60	140				B	A	A	A	
		80	176					A			
		100	212								
		120	248								
Sodium Metasilicate Na_2SiO_3		20	68	A	A	A	A	A	A	A	A
		40	104	A	A	A	A	A	A	A	A
		60	140	A	A	A	A	A	A	A	A
		80	176		A	A	A	A	A	A	A
		100	212				A	A	A		
		120	248				A	A			
Sodium Nitrate $NaNO_3$	Satu	20	68	A	A	A	A	A	A	A	A
		40	104	A	A	A	A	A	A	A	A
		60	140	A	A	A	A	A	A	A	A
		80	176		A	A	A	A	A	A	B
		100	212				A	A	A		
		120	248				A	A			
Sodium Nitrite $NaNO_2$	Satu	20	68	A	A	A	A	A	A	A	A
		40	104	A	A	A	A	A	A	A	A
		60	140	B	B	A	A	A	A	A	A
		80	176		B	A	A	A	A	A	B
		100	212				A	A	A		
		120	248				A	A			
Sodium Palmitate $Na(C_{15}H_{31}COO)$	5	20	68			A	A	A			
		40	104				A	A			
		60	140				A	A			
		80	176				A	A			
		100	212				A	A			
		120	248				A	A			

Chemical	Concentration (%)	Temp. °C	Temp. °F	PVC	CPVC	PP	PVDF	TEFLON	VITON	EPDM	NITRILE
Sodium Perborate $NaBO_3 \cdot 4H_2O$		20	68			A	A	A	A	A	A
		40	104			A	A	A	A	A	
		60	140			A	A	A	A	A	
		80	176			A	A	A	A		
		100	212				A	A			
		120	248				A	A			
Sodium Perchlorate $NaClO_4$		20	68	A	A	A	A	A	A	A	A
		40	104	A	A	A	A	A	A		
		60	140	B	B	A	A	A	A		
		80	176		B	B	A	A	A		
		100	212				A	A			
		120	248				A	A			
Sodium Peroxide Na_2O_2		20	68	A	A	A	A	A	A	A	B
		40	104	A	A	A	A	A	A		
		60	140	B	B	A	A	A	A		
		80	176		B	A	A	A	A		
		100	212				A	A			
		120	248				A	A			
Sodium Persulfate $Na_2S_2O_8$	Satu	20	68	A	A	A	A	A	A	A	X
		40	104	A		A	A	A	A	A	
		60	140	B		A	A	A	A	A	
		80	176				A	A	A	A	
		100	212				A	A	A		
		120	248					A			
Sodium Phosphate (Acidic) Na_3PO_4		20	68	A	A	A	A	A	A	A	A
		40	104	A	A	A	A	A	A	A	A
		60	140	A	A	A	A	A	A	A	A
		80	176		B		A	A	A	A	A
		100	212				A	A	A		
		120	248				A	A			
Sodium Phosphate (Alkaline) Na_3PO_4		20	68	A	A	A	A	A	A	A	A
		40	104	A	A	A	A	A	A	A	A
		60	140	A	A	A	A	A	A	A	A
		80	176		B	A	A	A	A	A	A
		100	212				A	A	A		
		120	248				A	A			
Sodium Phosphate (Neutral) Na_3PO_4		20	68	A	A	A	A	A	A	A	A
		40	104	A	A	A	A	A	A	A	A
		60	140	A	A	A	A	A	A	A	A
		80	176		B	A	A	A	A	A	A
		100	212				A	A	A		
		120	248				A	A			
Sodium Silicofluoride Na_2SiF_6		20	68	A	A	A	A	A	A	A	A
		40	104	A	A	A	A	A	A	A	
		60	140	B	A	A	A	A	A	A	
		80	176			A	A	A			
		100	212				A	A			
		120	248				B	A			
Sodium Sulfate Na_2SO_4	Satu	20	68	A	A	A	A	A	A	A	A
		40	104	A	A	A	A	A	A	A	A
		60	140	A	A	A	A	A	A	A	A
		80	176		A	A	A	A	A	A	B
		100	212				A	A	A		
		120	248				A	A			
Sodium Sulfide Na_2S		20	68	A	A	A	A	A	A	A	A
		40	104	A	A	A	A	A	A	A	A
		60	140	A	A	A	A	A	A	A	A
		80	176		A	A	A	A	A	A	B
		100	212				A	A	B		
		120	248				A	A			
Sodium Sulfite Na_2SO_3		20	68	A	A	A	A	A	A	A	A
		40	104	A	A	A	A	A	A	A	A
		60	140	A	A	A	A	A	A	A	A
		80	176		A	A	A	A	B	B	
		100	212				A	A			
		120	248				A	A			

* Moulded PVDF material is suitable for Sodium Hypochlorite; however, fusion welded joints may fail prematurely.

CHEMLINE Plastics Limited

Chemical	Concentration (%)	Temp. °C	Temp. °F	PVC	CPVC	PP	PVDF	TEFLON	VITON	EPDM	NITRILE
Silver Sulfate Ag_2SO_4		20	68	A	A	A	A	A	A	A	A
		40	104	A	A	A	A	A	A	A	A
		60	140	A	A	A	A	A	A	A	A
		80	176		A	A	A	A	A	A	B
		100	212				A	A	A		
		120	248				A	A			
Sodium Acetate CH_3COONa	Satu	20	68	A	A	A	A	A	A	A	A
		40	104	A	A	A	A	A		A	
		60	140	A	A	A	A	A		A	
		80	176		A	A	A	A		A	
		100	212				A	A			
		120	248				A	A			
Sodium Alum $NaAl(SO_4)_2 \cdot 12H_2O$	Satu	20	68	A	A	A	A	A	A	A	A
		40	104	A	A	A	A	A	A	A	A
		60	140	A	A	A	A	A	A	A	A
		80	176		A	A	A	A	A	A	B
		100	212				A	A	A		
		120	248				A	A			
Sodium Benzoate C_6H_5COONa		20	68	A	A	A	A	A			
		40	104	A	A	A	A	A			
		60	140	A	A	A	A	A			
		80	176			A	A	A			
		100	212				A	A			
		120	248				A	A			
Sodium Bicarbonate $NaHCO_3$		20	68	A	A	A	A	A	A	A	A
		40	104	A	A	A	A	A	A	A	A
		60	140	A	A	A	A	A	A	A	A
		80	176			A	A	A	A	A	
		100	212				A	A	A		
		120	248				A	A			
Sodium Bichromate $Na_2Cr_2O_7$	Satu	20	68	A	A	A	A	A	A	A	A
		40	104	A	A	A	A	A	A	A	A
		60	140	A	A	B	A	A	A	A	A
		80	176		B	B	A	A	A	A	B
		100	212				A	A	A		
		120	248				A	A			
Sodium Bisulfate $NaHSO_4$		20	68	A	A	A	A	A	A	A	A
		40	104	A	A	A	A	A	A	A	A
		60	140	A	A	A	A	A	A	A	A
		80	176		B	B	A	A	A	A	A
		100	212				A	A	A		
		120	248				A	A			
Sodium Bisulfite $NaHSO_3$		20	68	A	A	A	A	A	A	A	A
		40	104	A	A	A	A	A	A	A	A
		60	140	A	A	A	A	A	A	A	A
		80	176		B	B	A	A	A	A	A
		100	212				A	A	A		
		120	248				A	A			
Sodium Bromate $NaBrO_3$		20	68	A		A	A	A	A	A	X
		40	104				A	A	A	A	
		60	140				A	A	A	A	
		80	176				A	A			
		100	212				A	A			
		120	248					A			
Sodium Bromide NaBr	Satu	20	68	A	A	A	A	A	A	A	A
		40	104	A	A	A	A	A	A	A	A
		60	140	A	A	A	A	A	A	A	A
		80	176		A	A	A	A			
		100	212				A	A			
		120	248				A	A			
Sodium Carbonate Na_2CO_3		20	68	A	A	A	A	A	A	A	A
		40	104	A	A	A	A	A	A	A	A
		60	140	A	A	A	A	A	A	A	A
		80	176		A	A	A	A	A	A	
		100	212				A	A	A		
		120	248				A	A			

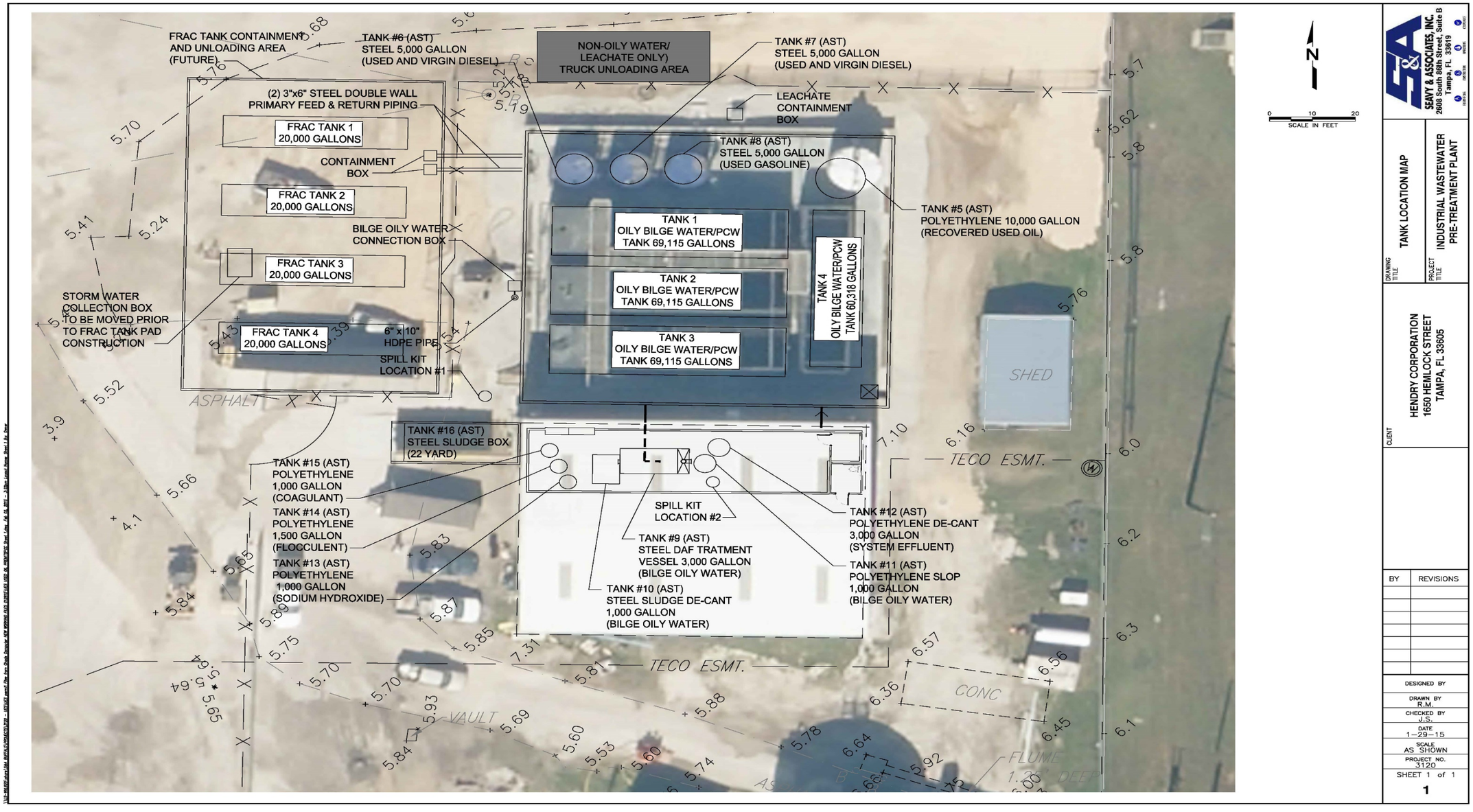
Chemical	Concentration (%)	Temp. °C	Temp. °F	PVC	CPVC	PP	PVDF	TEFLON	VITON	EPDM	NITRILE
Sodium Chlorate $NaClO_3$	Satu	20	68	A	A	A	A	A	A	A	C
		40	104	A	A	A	A	A	A	A	
		60	140	A	B	B	A	A	A	A	
		80	176		B	B	A	A	B	A	
		100	212				A	A	B		
		120	248				A	A			
Sodium Chloride (Brine) NaCl		20	68	A	A	A	A	A	A	A	A
		40	104	A	A	A	A	A	A	A	A
		60	140	A	A	A	A	A	A	A	A
		80	176		A	A	A	A	A	A	A
		100	212				A	A	A		
		120	248								
Sodium Chlorite $NaClO_2$	25	20	68	X	X		A	A	B	B	X
		40	104				B	B			
		60	140								
		80	176								
		100	212								
		120	248								
Sodium Cyanide (Aqueous) NaCN		20	68	A	A	A	A	A	A	A	
		40	104	A	A	A	A	A	A	A	
		60	140	A	A	A	A	A	A	A	
		80	176		B	B	A	A	A	A	
		100	212				A	A	B		
		120	248				A	A			
Sodium Dithionite $Na_2S_2O_4$	10	20	68	A		A	A	A	A	A	X
		40	104	A		A	A	A	A	A	
		60	140			A	A	A	A	A	
		80	176					A			
		100	212					A			
		120	248								
Sodium Ferricyanide $Na_3[Fe(CN)_6] \cdot H_2O$	Satu	20	68	A	A	A	A	A	A	A	A
		40	104	A	A	A	A	A	A	A	
		60	140	A	A	A	A	A	A	A	
		80	176		B	B	A	A			
		100	212				A	A			
		120	248				A	A			
Sodium Ferrocyanide $Na_4[Fe(CN)_6] \cdot 10H_2O$	Satu	20	68	A	A	A	A	A	A	A	A
		40	104	A	A	A	A	A	A	A	
		60	140	A	A	A	A	A	A	A	
		80	176		B	B	A	A			
		100	212				A	A			
		120	248				A	A			
Sodium Fluoride NaF		20	68	A	A	A	A	A	A	A	A
		40	104	A	A	A	A	A	A	A	
		60	140	A	A	A	A	A	A	A	
		80	176			A	A	A			
		100	212			A	A	A			
		120	248				A	A			
Sodium Hydroxide (Caustic Soda) NaOH	10	20	68	A	C	A	B	A	C	A	A
		40	104	A	X	A	B	A	C	A	A
		60	140	A	X	A	B	A	X	A	A
		80	176		X	B	C	A		A	A
		100	212				C	A			
		120	248					A			
Sodium Hydroxide (Caustic Soda) NaOH	15	20	68	A	B	A	A	A	C	A	A
		40	104	A	C	A	A	A	C	A	A
		60	140	A	C	A	B	A	X	A	A
		80	176		X	B	C	A		A	A
		100	212				X	A			
		120	248					A			
Sodium Hydroxide (Caustic Soda) NaOH	30	20	68	A	B	A	A	A	C	A	A
		40	104	A	B	A	A	A	X	A	A
		60	140	A	C	A	B	A		A	A
		80	176		X	A	C	A		A	A
		100	212				X	A			
		120	248					A			

CHEMLINE Plastics Limited

Chemical	Concentration (%)	Temp. °C	Temp. °F	PVC	CPVC	PP	PVDF	TEFLON	VITON	EPDM	NITRILE
Chromic Acid	220	20	68	A	A	X	A	A	X	X	
		40	104	B	B		A	A			
Chromium Sulfate	1	60	140	B	B		A	A			
		80	176		B		A	A			
Sodium Silicofluroide	12 g/l	100	212				A	A			
		120	248				A	A			
Chromic Acid	350	20	68	A	A	X	A	A	X	X	
		40	104	B	B		A	A			
Sodium Silicofluroide	17	60	140	C	C		A	A			
		80	176				A	A			
Oxalix Acid	1 g/l	100	212				A	B			
		120	248				A	B			
Nitric Acid	15	20	68	A	A	A	A	A			
		40	104	A	A	A	A	A			
	(1:1)	60	140	B	B	B	A	A			
Hydrofluoric Acid		80	176	X	X		A	A			
	3	100	212				A	A			
		120	248				A	A			
Nitric Acid	15	20	68	A	A	A	A	A	A	A	
		40	104	A	A	A	A	A	A	B	
	(1:1)	60	140	B	C	X	A	A	B		
Hydrofluoric Acid		80	176	X	X		A	A	B		
	5	100	212				A	A	C		
		120	248				B	A	X		
Nitric Acid	15	20	68	A	B	B	A	A			
		40	104	B	C	B	A	A			
	(1:1)	60	140	B	C		A	A			
Hydrofluoric Acid		80	176	X	X		A	A			
	10	100	212				B	A			
		120	248				B	A			
Nitric Acid	15	20	68	A	B	B	A	A			
		40	104	B	C	B	A	A			
	(1:1)	60	140	B	C		A	A			
Hydrofluoric Acid		80	176	X	X		A	A			
	15	100	212				B	A			
		120	248				B	A			
Nitric Acid	5	20	68	A	A	A	A	A			
		40	104	B	B	B	A	A			
	(1:1)	60	140	B	B	B	A	A			
Hydrofluoric Acid		80	176	X	B	C	A	A			
	20	100	212				B	A			
		120	248				B	A			
Nitric Acid	50 100g	20	68	B	B	B	A	A			
		40	104	X	X	X	A	A			
		60	140				A	A			
Sulfuric Acid	50 100g	80	176				A	A			
		100	212				A	A			
		120	248				A	A			
Sulfuric Acid	2	20	68	A	A	X	A	A	A	B	
		40	104	A	A		A	A	B		
	(1:1)	60	140	B	B		A	A	C		
Chromic Acid		80	176		B		A	A	X		
	1	100	212		C		A	A			
		120	248				A	A			
Sulfuric Acid	10	20	68	A	B	X	A	A	A	B	
		40	104	B	B		A	A	B		
	(1:1)	60	140	C	X		A	A	C		
Chromic Acid		80	176				A	A			
	10	100	212				A	A			
		120	248				A	A			
Sulfuric Acid	10	20	68	A	B	X	A	A	B	C	
		40	104	B	B		A	A	C		
	(1:1)	60	140	C	X		A	A	X		
Chromic Acid		80	176				A	A			
	25	100	212				A	A			
		120	248				B	A			

Chemical	Concentration (%)	Temp. °C	Temp. °F	PVC	CPVC	PP	PVDF	TEFLON	VITON	EPDM	NITRILE
Sulfuric Acid	4	20	68	B	B	X	A	A	X	X	
		40	104	B	B		A	A			
		60	140		B		A	A			
Chromic Acid	400 g/l	80	176		C		A	A			
		100	212				A	A			
		120	248				B	A			
Sulfuric Acid	15	20	68	A	A	X	A	A	A	B	
		40	104	A	A		A	A	A	B	
Chromic Acid	5	60	140	B	B		A	A	B	C	
		80	176				A	A	C	X	
Phosphoric Acid	80 parts	100	212				A	A	X		
		120	248				A	A			
Sulfuric Acid	2	20	68	A	A	X	A	A	A	X	
		40	104	A	A		A	A	B		
Chromic Acid	10	60	140	B	B		A	A	C		
		80	176		B		A	A	X		
Water	80 parts	100	212				A	A			
		120	248				A	A			
Sulfuric Acid	0.7	20	68	A	A	X	A	A	X	X	
		40	104	A	A		A	A			
Chromic Acid	250	60	140	B	B		A	A			
		80	176		B		A	A			
Sodium Silicofluoride	1 g/l	100	212				A	A			
		120	248				A	A			
Sulfuric Acid	20	20	68	A	A	X	A	A	A	A	
		40	104	B	B		A	A	B	B	
	(1:1)	60	140	B	B		A	A	C	C	
Hydrofluoric Acid		80	176		C		A	A			
	10	100	212				A	A			
		120	248				B	A			
Sulfuric Acid	25	20	68	A	A	X	A	A			
		40	104	B	B		A	A			
	(1:1)	60	140	B	B		A	A			
Hydrofluoric Acid		80	176	X	X		A	A			
	15	100	212				B	A			
		120	248				B	A			
Sulfuric Acid	75	20	68	A	A	B	A	A			
		40	104	A	A	B	A	A			
Nitric Acid	5	60	140	B	B	C	A	A			
		80	176		B		A	A			
Chlorine Gas	Trace	100	212					A			
		120	248					A			
Sulfuric Acid	75	20	68	A	A	A	A	A	A	A	
		40	104	A	A	B	A	A	B	A	
	(1:1)	60	140	A	A	B	A	A	C	B	
Sulfurous Acid		80	176		B	B	A	A	X	C	
	4	100	212				A	A			
		120	248				A	A			
Sulfuric Acid	150	20	68	A	A	A	A	A	A	A	
		40	104	A	A	A	A	A	A	A	
Spelter	80	60	140	A	A	A	A	A	A	A	
		80	176		B	B	A	A	B	B	
Manganese Sulfate	2 g/l	100	212				A	A			
		120	248				A	A			
Sodium Sulfade	225	20	68	A	A	A	A	A	A	A	B
		40	104	A	A	A	A	A	A	A	
Sulfuric Acid	225	60	140		A	A	A	A	A	A	
		80	176		B	B	B	B	A		
Formaldehyde	50 g/l	100	212				B	B	A		
		120	248								
Sulfuric Acid	98	20	68				A	A			
		40	104				A	A			
	(1:1)	60	140				C	B			
Phosphoric Acid		80	176								
	80	100	212								
		120	248								

9.6 Figure 1 – Site Map and Tank Location Map



ATTACHMENT 10 – CLOSURE PLAN

The administrative rules promulgated pursuant to Rule Chapter 62-710 of the Florida Administrative Code (F.A.C) and Title 40 of the Code of Federal Regulations (CFR), Part 279.(h), Subpart G, establishes requirements for the closure and, if necessary, post closure care of oil processing and hazardous waste management facilities. All references to 40 CFR citations specified herein are adopted by reference in R 299.11003.

The information provided was used to prepare the closure and postclosure care cost estimate provide in Section 10.9, "Closure and Postclosure Care Cost Estimates."

10.1 Closure Performance Standard

[40 CFR 279.54(h)]

This Closure Plan is designed to ensure that the facility will be closed in a manner that achieves the following:

a. Minimizes the need for further maintenance; and
b. Controls, minimizes, or eliminates, to the extent necessary to protect human health and the environment, postclosure escape of nonhazardous wastes, waste and reclaimed oil constituents, leachate, contaminated runoff, or waste decomposition byproducts to the groundwater, surface water, or atmosphere; and, as applicable.
c. Complies with the unit-specific closure requirements for each of the following units:

10.2 Unit-Specific Information (See Attachment 1 - Figure 1.3.1 for locations)

Table 10.2-1 -Waste Management Unit Information:

Unit Designation	Max Inventory	Closure Date	Dispose or Recycle
Containment Pad Area	3–69,300 Gal Primary Treatment Tanks 1- 48,600 Gal Primary Treatment Tank 1- 10,000 Gal Used Oil Tank 3- 5,000 Used and Virgin PCW Tanks		R R D R
Pre-treatment Building Containment Area	1-1,000 Gal Settling Tank 1-1,000 Gal Recycled Oil Tank 1- 1,000 Gal Sludge/Settled Solid Tank 1- 1,000 Gal Flocculant Tank 1- 1,000 Gal Sodium Hydroxide Tank 1-1,000 Coagulant Tank		D D R D D
Lab Area	Non-hazardous Reagents		D

Bulk Storage Area	Various Non-hazardous Drums and Totes		D
Frac and Roll-off /Truck Unloading Containment Area	4- 21,000 Gal Frac Tanks 1- 10 Yard Roll-Off for Sludge Disposal Containment		R R
Pipeline Area	800' 6"x10"x15" Triple contained HDPE Primary and Secondary with concrete pipe protection.		R

10.3 Closure Schedule

Has not determined when the facility will close and does not anticipate completing final closure of the entire facility prior to expiration of the facility's used oil processing operating license.

Closure Activity	**Schedule**
Initiate Closure; Cease Acceptance of Waste	Immediate
Process all equipment, piping and tanks in containment and Pre-treatment building containment area systems.	1 Week
Transfer all other waste off-site for disposal/recycling	1 Weeks
Transfer bulk wastes off-site to authorized disposal streams	1 Week
Process all liquids in containment pad tanks and pre-treatment building tanks	1 Week
Decontaminate equipment , pumps, piping and tanks on containment pad	2 Weeks
Decontaminate and Remove Equipment in Lab Room	1 Day
Decontaminate bulk storage area and pre-treatment area building containment area	2 Days
Decontaminate Surfaces in Pre-treatment Building, Containment Pad, Bulk Storage Area Bulk Storage Area and Containment Pad.	1 Week
Decontaminate and remove pumps, piping and all other equipment at facility.	4 Weeks
Sample Containment Area floors, Bulk Storage Area, Roll-Off, Sludge and Roll Off Truck Unloading Areas.	2 Weeks
Obtain P. E. Certification of Closure Performance	5 Days
Prepare and Submit Closure Report to DEP	4 Weeks

10.3.1 Notification and Time Allowed for Closure - Final closure activities will be initiated within 90 days of receipt of the final volume of hazardous wastes and completed within 180 days of receipt of the final volume of waste. The tasks and estimated time required for partial closure shall follow the schedule specified in **Section 10.3**. The DEP will be notified by the UES facility 60 days before final closure begins. Final closure will be certified by the UES owner and an independent, qualified, registered professional engineer of the state of Florida.

10.3.2 Extensions for Closure Time - In the event that an extension for closure for the facility or any unit is necessary, the UES facility will request an extension in accordance with the requirements of 40 CFR §279.54(h).

10.4 Unit-Specific Closure Procedures

Unit-specific closure procedures are provided for each unit identified in **Section 10.2** of this document.

10.4.1 Closure of Concrete Containment Pad Areas and Bulk Storage Area - This section describes the procedures for closure of *Containment Pad Areas and Bulk Storage Area.* The general closure requirement and specific closure procedures are discussed below.

10.4.1.A. General Closure Requirement - At closure, waste residues will be removed from the containment area systems and the bulk storage area. Remaining equipment contaminated with waste or waste residues will be decontaminated and removed.

10.4.1.B. Specific Closure Procedures - Specific procedures for inventory management, unit inspection, decontamination, sampling and analysis, and additional waste management are discussed below.

10.4.1.B.1 Inventory and Remedial Waste Management Procedures - A physical inventory check of all containers and equipment, tanks, piping, pumps in the Containment Pad will be completed and verified with the Preview system. All fuel and oil type wastes will be blended into the appropriate Tank Systems for transportation off-site for energy recovery. All remaining wastes will be shipped off-site for disposal and/or recycling.

10.4.1.B.2 Unit Inspection Procedures - A detailed inspection of each containment pad area and bulk storage area and wall will be completed. The inspection will document the location of spills, contamination and migration pathways. A similar inspection of the exterior walls of each containment pad will also be documented.

10.4.1.B.3 Decontamination Procedures - After inventory removal, the containment area and bulk storage area floors will be decontaminated. A surface cleaning technique (hydroblasting) will be used to decontaminate the surfaces of the concrete floors. The wash water and debris from the treatment is collected and separated. The solid

material is drummed for incineration or landfilling, and the water is recycled or collected for eventual bulk transportation to a permitted facility for proper management. All waste shall be properly manifested, labeled, and shipped as required by non-hazardous and hazardous waste regulations. These cleaning methods require a 3-man crew, high pressure pumps, and wash water holding tanks. Personnel operating the treatment equipment require additional personal protection equipment due to the inherent hazards in this cleaning method. Where appropriate, temporary run-off controls will be constructed to contain wash water.

Following the surface treatment, a sample of the final water rinseate will be collected for analysis and comparison to the performance standards. In addition, concrete cores will be collected from the floors of the container management units. Based on the square footage of each containment unit, the following numbers of sample locations are planned:

Concrete Pad Management Unit	Approximate Area (sq. ft.)	Number of Samples
Containment Pad Area	6,08	5
Pre-treatment Building Containment Area	2,000	3
Bulk Storage Area	4,60	4

10.4.1.B.4 Sampling and Analysis Procedures - Sampling will be biased toward visibly stained locations since these locations represent the greatest possibility of discovering residual contamination. Concrete wipe samples, core samples and soils samples will be collected from areas that appear stained. The samples will be and transferred directly into appropriate containers and stored in ice packed coolers for transportation to the laboratory. Soil samples for VOC analysis will be preserved in the field with methanol per DEP and EPA Methods. The soil samples will be analyzed for volatile organic compounds and semi-volatile organic compounds (SVOCs) and RCRA metals. The results will be compared to the Cleanup Criteria. Any soils determined to be contaminated will be removed and transported offsite to a treatment or disposal facility licensed to accept wastes described by the waste codes of the source of the contamination. These cores will be analyzed for volatile organic compounds and semi-volatile organic compounds to demonstrate that the concrete has been decontaminated. The coring and sampling requires specialized equipment and a 2-man crew.

Soil samples will also be collected from beneath each of the concrete core locations using a stainless steel hand auger that will be decontaminated between sample locations. One sample will be collected from each location at the 0-1 foot depth below the concrete surface and transferred directly into appropriate containers and stored in ice packed coolers for transportation to the laboratory.

In the event soil samples exceed the Soil Cleanup Target Criteria, monitoring wells will be installed and sampled at the location of the soil boring. The groundwater monitoring wells will be sampled based on the results of the soil sample. The samples will be tested for the same analyses of soil samples.

10.4.1.B.5 Additional Waste Management Procedures - Decontamination waste sand materials that cannot be decontaminated will be characterized, containerized and shipped off-site for disposal and/or recycling.

10.4.1.B.6 Other Control Procedures - Prior to initiating decontamination procedures, the site will be 'prepped' to maintain run- on and run-off control. The facility connection to the City of Tampa POTW sewer collection system will be closed to prevent unintended contaminated liquids to enter the system. All portable equipment to be decontaminated will be moved to an existing containment pad areas prior to initiating the decontamination process to prevent run-off of rinseates. Plastic sheeting or other suitable barrier will be erected along the containment wall where necessary to contain any overspray within the secondary containment structure.

All portable/dismantled decontaminated equipment/structures will be moved to a containment area away from the decontamination areas to prevent run-on of contaminated liquid. All sheeting will be containerized and transported off-site as a non-hazardous waste. All barriers utilized will be decontaminated and transported off-site to a metal recycler or solid waste disposal facility.

10.4.2 Closure of Roll Off and Truck Unloading Areas, Pre-treatment Building Laboratory and Pipeline Area- This section describes the procedures for closure of laboratory area. The general closure requirement and specific closure procedures are discussed below.

10.4.2.A. General Closure Requirement - At closure of the Lab and the Unloading and Roll Off Areas at the UES facility will remove or decontaminate all waste residues, contaminated containment system components (liners, etc.), contaminated soils, and structures and equipment contaminated with waste.

10.4.2.B. Specific Closure Procedures - Specific procedures for inventory management, unit inspection, decontamination, sampling and analysis, and additional waste management are discussed below.

10.4.2.B.1 Inventory and Remedial Waste Management Procedures - All flowable wastes the Roll Off will be transported off-site for energy recovery or incineration.

10.4.2.B.2 Unit Inspection Procedures - *A detailed inspection of the laboratory floor will be completed.* The inspection will document the location of spills, contamination and migration pathways. A similar inspection of the roll off pad and truck unloading areas will also be documented.

10.4.2.B.3 Decontamination Procedures - The roll off and associated piping will then be flushed with appropriate compatible cleaning solutions to reduce any liquid, solid or clinging waste residues. The resulting residues will either be collected into containment area and sent to a suitably permitted recycling facility, or transported off site to authorized facilities for reclamation, treatment and/or disposal at other authorized facilities.

The remaining components of the piping system will then either be decontaminated on site utilizing methods described in Table 1 of 40 CFR 268.45, Laboratory equipment not

opened will be reused, laboratory equipment open or with containers that have been compromised will be placed into containers and transported offsite to an authorized facility for reclamation, treatment and/or disposal.

Waste residues will be removed from roll-off by flushing and steam cleaning. Steam cleaning is a proven technique for decontaminating surfaces and mobilizing heavier liquids.

10.4.B.4 2 Sampling and Analysis Procedures - Sampling will be biased toward visibly stained locations in the laboratory, roll off pad and unloading areas. Concrete wipe samples will also be collected from areas that appear stained. The samples will be and transferred directly into appropriate containers and stored in ice packed coolers for transportation to the laboratory. Soil samples for VOC analysis will be preserved in the field with methanol per DEP and EPA Methods. The soil samples will be analyzed for volatile organic compounds and semi-volatile organic compounds (SVOCs) and RCRA metals. The results will be compared to the Cleanup Criteria. Any soils determined to be contaminated will be removed and transported offsite to a treatment or disposal facility licensed to accept wastes described by the waste codes of the source of the contamination.
In the event soil samples exceed the Soil Cleanup Target Criteria, monitoring wells will be installed and sampled at the location of the soil boring. The groundwater monitoring wells will be sampled based on the results of the soil sample. The samples will be tested for the same analyses of soil samples.

Lab and Soils Management Unit	Approximate Area (sq. ft.)	Number of Samples
Roll Off and Truck Unloading Areas	1,200	2
Pre-treatment Building Laboratory Area	200	1
Pipeline Area	800 linear Feet	5

10.5 Certification of Closure

Within 60 days of completion of closure UES will submitted the Director, by registered mail, a certification that the facility, as applicable, has been closed in accordance with the specifications in the approved closure plan. The certification will be signed by UES and by an independent registered professional engineer. Documentation supporting the independent registered engineer's certification will be furnished to the Director in accordance with FAC requirement including:

1. The results of all sampling and analysis;
2. Sampling and analysis procedures;
3. A map showing the location where samples were obtained;

4. Any statistical evaluations of sampling data;
5. A summary of waste types and quantities removed from the site and the destination of these wastes; and
6. If soil has been excavated, the final depth and elevation of the excavation and a description of the fill material used.

The UES facility will maintain financial assurance for closure until the Director releases the UES facility from the financial assurance requirements for closure.
The certification must be worded as follows:

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to be the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

10.6 Postclosure Notices Filed

The applicant must provide documentation that the postclosure notices required under 40 CFR §265.310 have been filed for hazardous waste disposal units that have been closed at the facility.

10.7 POSTCLOSURE PLAN

10.7.1 Applicability - Not applicable: Hazardous waste is not being stored at the facility. In addition waste will not be left behind at closure. A survey plat, postclosure care, postclosure certifications, and other notices are not required.

10.8 Applicability - Not applicable

Hazardous waste is not being stored at the facility. In addition waste will not be left behind at closure. A survey plat, postclosure care, postclosure certifications, and other notices are not required.

10.9 Closure Cost Estimate

Attached is the Used Oil Processing Facility Closing Cost Estimate Form and contractors cost estimate and proposal.

Florida Department of Environmental Protection

Bob Martinez Center • 2600 Blair Stone Road • Tallahassee, Florida 32399-2400

DEP Form #62-710.901(7)
Form Title Used Oil Processing Facility Closing Cost Estimate Form
Effective Date 4-23-13
Incorporated in Rule 62-710.800(6)(b)

Used Oil Processing Facility Closing Cost Estimate Form

Date: _____ Date of DEP Approval: _____ (DEP use only)

I. GENERAL INFORMATION: Latitude: 27.93806461 Longitude: 82.44114158 EPA ID Number: FLR000199802

Facility Name: Universal Environmental Solutions, LLC Permit Number: _____

Facility Address: 1650 Hemlock St. / Tampa FL. 33605

Mailing Address: P.O. BOX #76105 / Tampa FL. 33675

Contact Person's Name: Ed Kinley Phone Number: (813) 241-9206 x 183

E-mail: ekinley@uestampa.com Fax Number: (813) 241-9215

II. TYPE OF FINANCIAL ASSURANCE DOCUMENT (Check Type)

_____ Letter of Credit* _____ Performance Bond* X Guarantee Bond*

_____ Insurance Certificate _____ Financial Test _____ Trust Fund Agreement

*Indicate mechanisms that require use of a Standby Trust Fund Agreement

III. ESTIMATE ADJUSTMENT: (check and use either box a or b, below)

Rule 62-710.800(6)(c), Florida Administrative Code, sets forth the method of annual cost estimate adjustment. Cost estimates may be adjusted by using an inflation factor or by recalculating the maximum costs of closing in current dollars. Estimates are due annually between January 1 and March 1. Select one of the methods of cost estimate adjustment below.

☐ **(a) Inflation Factor Adjustment**

Inflation adjustment using an inflation factor may only be made when a Department approved closing cost estimate exists and no changes have occurred in the facility operation which would necessitate modification to the closure plan. The inflation factor is derived from the most recent Implicit Price Deflator for Gross National Product published by the U.S. Department of Commerce in its survey of Current Business. The inflation factor is the result of dividing the latest published annual Deflator by the Deflator for the previous year. The inflation factor may also be obtained from the Solid Waste Financial Coordinator at (850) 245-8732 or be found online at http://www.dep.state.fl.us/waste/categories/swfr/

This adjustment is based on the Department approved closing cost estimate dated: _____

Latest DEP approved Closing Cost Estimate	X	Current Year Inflation Factor	=	Inflation Adjusted Annual Closing Cost Estimate
_____		_____		_____

Signature: _____ Phone: _____

Name and Title: _____ E-mail: _____

If you have questions concerning this form, please contact the Used Oil Permitting Coordinator at the address below, by phone at (850) 245-8781, or by e-mail at: Bheem.Kothur@dep.state.fl.us

Please mail this completed cost estimate to:

Used Oil Permitting Coordinator
Florida Department of Environmental Protection
2600 Blair Stone Road MS 4560
Tallahassee, FL 32399-2400

Please e-mail or mail a copy of the cost estimate to:

Solid.Waste.Financial.Coordinator@dep.state.fl.us
or
Solid Waste Financial Coordinator - FDEP
2600 Blair Stone Road MS 4565
Tallahassee, FL 32399-2400

1 of 3

☒ (b) Recalculated Cost Estimates (complete items IV and V)

IV. RECALCULATIONS OF CLOSING COSTS

For the time period in the facility's operation when the extent and manner of its operation makes closing **most expensive**.

Third Party Estimate/Quote must be provided for each item.
Costs must be for a third party providing all materials and labor.

DESCRIPTION	UNIT	QUANTITY	UNIT COST	TOTAL
1. Decontamination and Disposal Note: These costs must be broken down by individual waste stream. If contamination is found, the cost estimate must be recalculated to include remediation costs.				
a. Used Oil Tanks, containers, piping, equipment and secondary containment decontamination	Tanks	5	$5,000.00	$25,000.00
waste characterization	Tanks	5	$600.00	$ 3,000.00
disposal	Gallon	266500	$.25/gal	$66,625.00
b. Wash Water waste characterization	Lump Sum	1	$600.00	$600.00
disposal	Gallon	22,000	$.25/gal	$5,500.00
c. Sludges/Sediment waste characterization	Lump Sum	1	$600.00	$600.00
disposal	Gallon	5,000	$1.00	$5000.00
d. Used Oil Filter Management waste characterization	Lump Sum	1	$600.00	$600.00
disposal	Tons	5	$100.00	$500.00
e. Petroleum Contaminated Water (PCW), tanks, containers, piping, equipement and secondary containment waste characterization	Tanks	3	$650.00	$1,950.00
disposal	Gallon	15,000	$.25/gal	$3,750.00
f. Mobilization Costs	Lump Sum	1	$5,000.00	$5,000.00
g. Other Tank(s) Removal	8	$10,000.00	$80,000.00	$80,000.00
			Subtotal (1) Decontamination/Disposal:	$197,975.00

2. Engineering (On-site Inspections and Quality Assurance are to be included in this item).

a. Closure sampling and analysis plan implementation as described in the permit application — $9000.00

b. Closure Certification Report — $5000.00

Subtotal (2) Professional Services: $14,000.00

Subtotal of (1) and (2) Above: $211,975.00

3. Contingency (10% of the Subtotal) $21,197.50

TOTAL CLOSING COST: $233,172.50

V. CERTIFICATION BY ENGINEER and OWNER/OPERATOR

This is to certify that the Closing Cost Estimates pertaining to the engineering features of the this used oil processing facility have been examined by me and found to conform to engineering principals applicable to such facilities. In my professional judgment, the Cost Estimates are a true, correct and complete representation of the financial liabilities for closing of the facility, and comply with the requirements of Florida Administrative Code (F.A.C.) Rule 62-710 and all other Department of Environmental Protection rules, and statutes of the State of Florida. It is understood that the Closing Cost Estimates shall be submitted to the Department **annually** between January 1 and March 1 of each year and revised, adjusted and updated as required by Rule 62-710.800(6)(c), F.A.C.

RACHAEL KEITH COATS LICENSE No. 48917 STATE OF FLORIDA PROFESSIONAL ENGINEER

Signature of Engineer — 2/4/15

Engineer's Name and Title (please print or type) — Keith Coats

Florida Registration Number (please print or type) — 48917

Engineer's Mailing Address — 2608 S 86th St Tampa, FL 33619

Engineer's Telephone Number — 813-917-9267

Engineer's E-mail Address — Kcoats@acgtampa.com

Signature of Owner/Operator — E. Kinley

Owner/Operator's Name and Title (please print or type) — Ed Kinley / President

Owner/Operator's Telephone Number — (813) 241-9206

Owner/Operator's E-mail Address — EKinley@uestampa.com

Plant Closure Estimate Worksheet

1 a. USED OIL TANKS (includes all four AST process tanks + one dedicated Used Oil tank) = 266,500 gallons

- Assumes all five tanks are full....266,500 gallons X .25 per gallon T & D
- Analysis of each tank (Metals / Volatiles / Semi –Volatiles)
- Decontamination...five tanks X $5,000.00 per

1b. WASH WATER

- Assumes contractor will generate 5,000 gallons per tank of rinseate in the four process tanks + 2,000 gallons of rinseate in the Used Oil tank = 22,000 gallons of Non Hazardous "wash water".
- One laboratory test (Metals / Volatiles / Semi – Volatiles) of bulk "wash water"

1c. SLUDGES / SEDIMENT

- Assumes 1,250 gallons of non processible tank bottom sludge in each of the four process tanks = 5,000 gallons

1d. USED OIL FILTERS

- Assumes 5 tons for Non Hazardous Incineration (City of Tampa – McKay Bay)
- One laboratory test (Metals / Volatiles / Semi – Volatiles)

1e. PCW TANKS & PIPING

- Assumes all three Diesel & Gasoline tanks are full (15,000 gallons total)
- One laboratory test (Metals / Volatiles / Semi – Volatiles / Flash)

1f. MOBILIZATION

- Assumes local environmental services contractor and delivery of equipment to perform closure activities.

1g. OTHER

- Assumes removal of: (4) Empty Process tanks / (1) Used Oil tank / (3) PCW tanks

SEAVY & ASSOCIATES, INC.

October 16, 2014

Mr. Ed Kinley
Gulf Marine Repair Inc.
1650 Hemlock Street
Tampa, Florida 33605

Re: Used Oil Processing Facility Closing Cost Estimate

Dear Mr. Kinley:

As requested, Seavy & Associates, Inc. (S&A) has prepared this proposal to provide labor, equipment, and materials for closure of the Used Oil Processing Facility. The scope of work and cost estimate is included with this proposal.

Task 1 – Used oil Tanks, Containers, Piping, Equipment, and Secondary Containment Decontamination

- The tanks will have samples collected for a waste characterization for disposal.
- S&A will contract a certified used oil disposal facility to remove and dispose of any oil liquids from the tanks.
- The tanks will be pressure washed utilizing a hot water pressure washer and degreaser to decontaminate tanks, containers, piping, equipment, and secondary containment.
- Utilizing a roll-off piping, containers, and equipment will be disposed.

Task 2 – Wash Water

- After cleaning of the tanks is completed, the tanks wash water will be sampled for a waste Characterization.
- S&A will contract a certified disposal facility to remove and dispose of the wash water generated from the tank cleaning.

Task 3 – Sludge's/Sediment

- After the Tanks have been emptied of oil, before cleaning, any sludge/sediment remaining in the tanks will be sampled for a waste characterization.
- S&A will contract a certified disposal facility to remove and dispose of any sludge/sediment left in the tanks.

Task 4 – Used Oil Filter Management

- Samples will be collected from the used oil filters to generate a waste characterization.
- S&A will contract a certified disposal facility to collect and dispose of the used oil filter material.

Task 5 – Petroleum Contaminated Water (PCW), Tanks, Containers, Piping, Equipment and Secondary Containment.

- After cleaning of the tanks is completed, the tanks wash water will be sampled for a waste Characterization.

- S&A will contract a certified disposal facility to remove and dispose of the wash water generated from the tank cleaning.

Task 6 – Mobilization

- S&A Will Mobilize all needed tools, equipment, and supplies and set up a decontamination area prior to starting closure activities.

Task 7 – Tank(s) Removal

- S&A will utilize a crane to load clean tanks onto flatbed trucks for recycling/disposal of tanks.

Task 8 – Closure Sampling and Analysis Plan Implementation.

- S&A will develop a sampling plan based on the UES used oil processing facility closing cost estimate form.
- Samples will be collected and analyzed by a NELAC Certified Laboratory. The analytical data will be used to create waste characterization forms to allow for proper disposal as outline through task's 1-5.

Task 9 – Closure Certification Report

- S&A will create the Closure Certification Report upon completion of all closure activities.

If you have questions or need additional information, please do not hesitate to contact me at 813-917-9267.

Very truly yours,
SEAVY & ASSOCIATES, INC.

Jim Seavy,
President

Universal Environmental Solutions, LLC
Seavy & Associates, Inc. is authorized to initiate service per this Proposal, General Assumptions, Exhibit A as of _____, 2014.

By:_____

Title:_____

Date:_____

Attachments:
Exhibit A: Cost Breakdown Sheet

SEAVY & ASSOCIATES, INC

Project: UES Pre-Treatment Closure
ESTIMATE BY: DMS
DATE: 13-Oct-14

CLIENT: Universal Environmental Solutions
LOCATION: UES
Tampa

TASK 1: Used oil tanks, containers, piping, equipment and secondary containment decontaminatior
TASK 2: Wash water disposal
TASK 3: Sludges/Sediment disposal
TASK 4: Used oil Filter management
TASK 5: Petroleum contaminated water, Tanks, containers, piping, equipment and secondary Containment Disposa
TASK 6: Mobilization Costs
TASK 7: Tank Removal
TASK 8: Closure sampling and analysis plan implementatior
TASK 9: Closure certification report

Assumptions:

PERSONNEL LEVEL	BILLING RATE	TASK 1	TASK 2	TASK 3	TASK 4	TASK 5	TASK 6	TASK 7	TASK 8	TASK 9		TOTAL HOURS	TOTAL LABOR COST
Officer P.E.	$121	0.0	0.0	0.0	0.0	0.0	0.0	0.0	8.0	10.0	0.0	18.0	$2174
Technial Associate/Enginee	$86	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	12.0	0.0	12.0	$1035
Electrician	$108	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	$
Supervisor	$66	40.0	8.0	8.0	8.0	8.0	8.0	8.0	0.0	0.0	0.0	88.0	$5768
Operater	$60	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	$
Technician/Admin	$52	100.0	6.0	0.0	0.0	0.0	16.0	16.0	16.0	20.0	0.0	174.0	$9005
CADD	$67	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	16.0	0.0	16.0	$1067
											0.0	0.0	$
											0.0	0.0	$
TOTAL: LABOR HOURS		140.0	14.0	8.0	8.0	8.0	24.0	24.0	24.0	58.0	0.0	308.0	
TOTAL: LABOR COST		$7,797	$835	$524	$524	$524	$1,352	$1,352	$1,794	$4,345	$0	$19,049	$19,049

TASK 1: Used oil tanks, containers, piping, equipment and secondary containment decontaminatior
TASK 2: Wash water disposal
TASK 3: Sludges/Sediment disposal
TASK 4: Used oil Filter management
TASK 5: Petroleum contaminated water, Tanks, containers, piping, equipment and secondary Containment Disposa
TASK 6: Mobilization Costs
TASK 7: Tank Removal
TASK 8: Closure sampling and analysis plan implementatior
TASK 9: Closure certification report

Markup: 15%

DIRECT EXPENSE DESCRIPTION	UNIT	UNIT COST	0 TASK 1	0 TASK 2	0 TASK 3	0 TASK 4	0 TASK 5	0 TASK 6	0 TASK 7	0 TASK 8	TASK 9	TASK 10	TOTAL UNITS	TOTAL DIRECT COST	15% MARKUP + DIRECT COST
Crane for Tank Install	Per Day - 4 Hr Min	$1,560.00	0	0	0	0	0	0	1	0	0	0	1	1,560	1,794
Misc Directs/Phone/CC/Eq Delivery/Misc	Lump Sum	2% of Labor	2% of Labor	2% of Labor	2% of Labor	2% of Labor	2% of Labor	2% of Labor	2% of Labor	2% of Labor	2% of Labor	2% of Labor	0	381	438
Mileage	Mil	$0.63	244	0	0	0	0	0	0	0	0	0	244	154	177
Tool Truck	Day	$50.00	5	0	0	0	0	0	0	0	0	0	5	250	288
pressure Washer	Day	$150.00	6	0	0	0	0	0	0	0	0	0	6	900	1,035
Degreaser	Per	$58.00	20	0	0	0	0	0	0	0	0	0	20	1,160	1,334
Pump	Day	$100.00	5	0	0	0	0	0	0	0	0	0	5	500	575
Used oil/Wash Water Disposal	Per	$0.25	266500	22000	0	0	0	0	0	0	0	0	288500	72,125	82,944
Waste Characterization	Per	$600.00	5	1	1	1	0	0	0	0	0	0			
Health and safety fluids	Day	$30.00	5	0	0	0	0	0	0	0	0	0	5	150	173
Sludge/Sediment Disposal	per	$1.00	0	0	5000	0	0	0	0	0	0	0	5000	5,000	5,750
Used oil Filter Disposal	Ten	$100.00	0	0	0	5	0	0	0	0	0	0	5	500	575
PCWWaste Characterization	Per	$650.00	0	0	0	0	3	0	0	0	0	0	3	1,950	2,243
PCW Water Disoposal	Per	$0.25	0	0	0	0	15000	0	0	0	0	0	15000	3,750	4,313
Mobilization cost	Lump Sum	$4,345.00	0	0	0	0	0	1	0	0	0	0	1	4,345	4,997
Tank Removal	Per	$8,500.00	0	0	0	0	0	0	8	0	0	0	8	68,000	78,200
Closure sampling and anaysis implementation	Lump	$6,225.00	0	0	0	0	0	0	0	1	0	0	1	6,225	7,159
Report Repro	Sheet	$0.22	0	0	0	0	0	0	0	0	2100	0	2100	462	531
Roll-off	Per	$350.00	1	0	0	0	0	0	0	0	0	0	1	350	403
	Per Quote	$0.00	0	0	0	0	0	0	0	0	0	0	0	0	0
	Lump	$0.00	0	0	0	0	0	0	0	0	0	0	0	0	0
	Per	$0.00	0	0	0.0	0.0	0	0	0	0	0	0			
TOTAL DIRECT COST			$84,232	$7,034	$6,452	$1,277	$6,567	$5,028	$80,025	$7,200	$631	$0			$192,927
TOTAL TASK COST (LABOR + DIRECTS)			$92,029	$7,869	$6,976	$1,801	$7,091	$6,380	$81,378	$8,994	$4,976	$0			**$211,975**

ATTACHMENT 11 –EMPLOYEE TRAINING PLAN

11.1 UES Training Program - SPCC and General Health & Safety Training

A. Program Intent

- Federal (U.S. EPA) program for proper onsite management and handling of oil, prevention of spills, and proper spill response if spills occur. The U. S. EPA could inspect facility for compliance with the site SPCC Plan.
- Provide compliance with Oil Processing Permit requirements for the UES oil processing plant located at 1650 Hemlock Ave Tampa FL.
- "Oil" includes petroleum-based materials (gasoline, diesel fuel, kerosene, fuel oil, motor oil, hydraulic fluid, used oil, transformer oil, etc.), as well as vegetable oil, in a container having a capacity of 55 gallons or more.

B. SPCC Plan

Developed for implementation by site personnel. Facility copy must be maintained/updated by facility's SPCC Coordinator. Copy is available for review by all employees at any time.

C. Training -Who, When, What

Who: All facility employees involved in handling and management of any oil.

When: Minimum initial and annual refresher for all employees involved in oil handling.
- Within two weeks of hire for new employees involved in oil handling.
- If/when facility oil handling changes (so the SPCC Plan must be dated).

What: Initial: Entire SPCC Plan
Annual Update: Known spillevents or failures, malfunctioning components
Ongoing: Facility changes, recently developed precautionary measures

D. SPCC Coordinator

Responsible for SPCC Plan implementation and oil spill prevention at the facility;
See that person if ever any question or concern.

E. General Facility Layout, Site Plan and Drainage Systems

Ensure understanding of general facility operations, overall facility layout, drainage discharge locations, sensitive receiving water bodies, etc. Figure 1.3.1 summarizes the facility locations for PCW and oil handling.

F. Facility's Specific Oil Handling Inventory

Applies to containers with a capacity of 55 gallons or more, and transfers to/from them:
Stationary and mobile aboveground storage tanks (ASTs)
Underground storage tanks (USTs)
Drum and "tote" tank storage and handling

Also applies to:
Gauges, alarms, and leak detection systems
Piping systems
Oil-filled electrical, operating, and manufacturing equipment
Oil unloading/loading areas
Additional oil storage or handling activities

G. Containment and/or Diversionary Structures or Equipment to Prevent a Discharge

Specific facility measures provided, as per the SPCC Plan
Important because spilled oil will flow in accordance with drainage paths
Intent of program is to keep oil out of water, out of stormwater and drainage
Review operation and maintenance of all equipment intended to prevent discharges

H. Facility Drainage (**Section 6.0 – Figure 3 Stormwater Drainage Plan**)

Management of drainage from diked areas
Drainage from undiked areas
Potential impact on surface waters (including wetlands)

I. Facility Transfer Operations. Pumping and In-plant Processes **(Attachment 6.0 SPCC Plan Section VI and Figure 3 Stormwater Drainage Plan**)

Operation and maintenance measures to prevent discharges

J. Truck Unloading/loading Areas

Spills from inbound/outbound transfers, including direction of flow Unloading/loading must be visually monitored by facility personnel at all times Immediate response must be made to any spills, per the Plan's spill response procedures

K. Inspections and Tests (Attachment 6 - SPCC Plan Appendix B and E)

Comprehensive visual inspection monthly, with documentation prompt completion of required repairs, with documentation Periodic integrity testing of tanks

L. Security

General facility security measures, and localized M easures for individual oil handling areas. The facility limits are fences and entry can only be approved by the plant operator or facility owner. The UES pretreatment facility is located within a secure area that requires security gate clearance to enter.

M. Spill Response Procedures

Need to watch for, report, and clean up spills
Spill response equipment, inventory, minimum amount to be always maintained, replenishment of use materials, etc.
Review understanding of spill equipment, intent and how to use/deploy it; supplement with construction equipment if necessary, etc.
Spill reporting requirements to Federal and State agencies

N. Additional State Requirements

Petroleum Bulk Storage Program
Used oil requirements

O. Miscellaneous

Describe and review past discharges, reasons or causes, procedures to prevent recurrence, etc.
Describe and review any other equipment failures, malfunctioning components and any recently developed precautionary measures relative to oil handling and spill control

P. General Rules

Do not wait for problems or spills to occur. Keep eyes open, anticipate problems and take precautionary measures to prevent incidents. Report all identified or suspected concerns.

Q. Any Questions?

Facility: UES Bilge Oily Water Processing Facility, Tampa Florida 33619

1. SPCC Plan Personnel Training topics

   Operation and maintenance of equipment to prevent discharges
   Discharge procedure protocols
   Applicable pollution control, laws, rules and regulations
   General facility operations
   Contents of the facility SPCC Plan

2. Discharge Prevention Briefings

   Known discharges and failures
   Malfunctioning components
   Any recently developed precautionary measures

Training/Briefings Date: _____

Training/Briefings Presented By: _____ Attendees:

Name	Signature	ID Number

11.2 UES Training - 40 Hour HazWOper Training & DOT Training

UES requires all new hired employees to be OSHA 40 Hr HazWOper trained. All exisiting employees are HazWOper trained and are current with the required 8 Hr HazWOper Annual refresher training. Documentation of employee training records are kept in the UES office onsite and are available for review upon request.

11.2.1- OSHA 40 Hour HazWOper Training Topics and Objectives

OSHA 40 Hr and 8 Hr HazWOper training is conducted for all employees of UES. Training is conducted for all facility operator and transporters. UES contracts a local Tampa OSHA certified training contractor to conduct all employee training.

- Understand the purpose of OSHA and its role in regulating occupational safety
- Use Site Characterization to establish problems that may exist in your workplace and measures that can be implemented to eliminate hazards
- Identify hazardous materials existent in the workplace and the possible methods, symptoms and preventative measures of exposure
- Encourage the use of Material Safety Data sheets (MSDS) to identify and properly handle hazardous materials
- Familiarize yourself with materials, compounds and mixtures that may present flammable, explosive, chemical or radiological hazards
- Emphasize the importance of personal protective equipment in limiting hazardous exposure
- Establish an effective Site Control Program to limit the risk of exposure to only those working in the hazardous work zone
- Implement procedures for treating workers in the event of hazardous exposure
- Review of DOT regulations for transportation and hazardous materials handling.

11.2.1- 40 Hour HazWOper Training DOT Transportation Topics

The following DOT hazardous waste transportation topics are covered under the 40 Hr HazWOPer training conducted annually.

- DETERMINE WHETHER A MATERIAL MEETS THE DEFINITION OF A "HAZARDOUS MATERIAL"
- SHIPPING PAPER
- PLACARD AND MARK VEHICLE
- LOADING AND UNLOADING
- COMPATIBILITY
- BLOCKING AND BRACING
- INCIDENT REPORTING
- SECURITY PLAN

11.2 UES Training Records

Records of all employee training are retained at the UES main office located to the west of the facility. Administration and tracking of the employee training schedules are managed by Ed Kinley and an administrative assistance. Training schedules are updated monthly and scheduled using scheduling software. New hire employees are require to complete the OSHA 40 Hr HazWOper training prior commencement of any onsite activities at the facility.