## BEFORE THE STATE OF FLORIDA DEPARTMENT OF ENVIRONMENTAL PROTECTION

IN RE: INTERNATIONAL PETROLEUM CORPORATION
105 South Alexander Street
Plant City, Florida 33599

RESPONSE TO FDEP WARNING LETTER #187521 DATED DECEMBER 1, 1997

#### VOLUME I OF II

Respectfully submitted,

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August 11, 1998

#### VIA FEDERAL EXPRESS

James M. Dregne
Hazardous Waste Program
Division of Waste Management
Southwest District
Department of Environmental Protection
3804 Coconut Palm Drive
Tampa, Florida 33619



Re: International Petroleum Corporation, EPA ID # FLD 065680613

- (1) Warning Letter #187521, Hillsborough County
- (2) FDEP Unauthorized RCRA Policy for Generators of Used Antifreeze
- (3) Request for Placement on FDEP Vendors List of Antifreeze Recyclers

Dear Mr. Dregne:

On behalf of International Petroleum Corporation ("IPC"), this letter (1) responds to the Department's Warning Letter of December 1, 1997 and subsequent letter of June 25, 1998, the latter proposing a civil penalty of \$54,150.00; (2) objects to the Department's unauthorized attempt to favor one form of antifreeze recycling over another; and (3) requests corrective action, including immediate recission of an illicit RCRA policy together with placement of International Petroleum Corporation on the Department's published "Vendor List of Antifreeze Recyclers."

### I. FDEP WARNING LETTER

The Warning Letter and proposed penalty are based on alleged RCRA violations primarily relating to the processing of small quantities of waste anti-freeze from eight generators and to the disposal of eleven truckloads of used oil tank and railcar bottoms.

For the reasons given below, most of the alleged violations are unsubstantiated and the proposed penalty, unwarranted. We would like to reach an amicable resolution, however, and to that end offer to pay a civil penalty of \$1530, with no admission of liability.

#### Factual Background

As you know, International Petroleum operates a state-of-the-art used oil re-refinery located at 105 South Alexander Street, Plant City, Florida. The refining process utilizes a unique multi-stage distillation system including atmospheric and vacuum distillation columns. Through this process, used oil and contaminated petroleum products, including off-specification virgin fuels, are recycled into on-specification used oil fuel that is equivalent to Virgin No. 5 Fuel Oil. The Virgin No. 5 equivalent oil may also be blended with other virgin fuels to meet the specifications of customers.

The two-stage distillation process is unique. No comparable rerefinery operates in the eastern United States. Other used oil processors use more rudimentary methods, which do little more than extract water and remove solids.

The International Petroleum re-refinery does not knowingly accept off-specification used oil or hazardous waste. Used oil and oil contaminated material are pre-screened prior to pick-up, tested at the plant before they are unloaded, and tested again after processing. The company's drivers are trained and retrained on the importance of screening materials closely in order to ensure that unauthorized wastes are not delivered to the plant.

Water, which is distilled from the used oil, is pretreated in the wastewater treatment unit prior to discharge to the Plant City POTW, where it is recycled for agricultural use.

Light distillates, condensed by the process, are used as the primary fuel for the on-site Born furnace which provides energy for the recycling process. These light hydrocarbons consist mainly of gasoline, kerosene, and diesel fuel with a low flash point, and hydrocarbons resulting from the processing of used antifreeze. This

off-specification used oil is burned incidental to used oil processing in accordance with 40 C.F.R. §279.60(a)(2) and an FDEP approved Air Operating Permit.

The violations alleged in the FDEP Warning Letter, and the June 25, 1998 letter, are addressed below:

### A. Failure To Make A Waste Determination of Eleven Truckloads of Used Oil Tank Bottoms

Of the \$54,150.00 penalty proposed by the June 25, 1998 FDEP letter, \$25,000.00 is attributed to International's alleged failure to make a waste determination on eleven truckloads of tank bottoms in violation of 40 C.F.R. § 262.11.

The Warning Letter alleges that on March 10, 14, and 17, 1997, eleven truckloads of soil, sand and sludge were manifested to Clark Environmental for disposal as non-hazardous waste "using the 1991 profile document." The waste was generated during the cleaning of used oil storage tanks and rail cars.

Contrary to the allegations, however, a waste determination was made in accordance with 40 C.F.R. § 262.11(c)(2). While it was made without TCLP (Toxic Characteristic Leaching Procedure) testing, no such testing was required. A waste determination based on process or generator knowledge is equally valid under federal and state rules.  $^1$ 

Under 40 C.F.R. § 262.11, it is the burden of the generator to initially determine whether a waste is hazardous. If the waste is not excluded under 40 C.F.R. § 261.4 or listed under Subpart D of 40 C.F.R. Part 261, the generator must determine whether the waste exhibits a hazardous characteristic identified in Subpart C of 40 C.F.R. Part 261. This may be done by using one of two distinct and equally valid methods.

One method entails "[t]esting the waste according to methods set forth in Subpart C of 40 C.F.R. Part 261;" the other requires

<sup>40</sup> C.F.R. § 262.11(c)(2); § 62-730.160, F.A.C.

"[a]pplying knowledge of the hazard characteristic of the waste in light of the materials or the processes used." $^{2}$ 

In a preamble to regulations published in 1980, EPA explained what it meant by a waste determination based on process knowledge:

[a] person may declare his waste hazardous or nonhazardous, but this must be based on his knowledge of the materials and processes involved. A person need not test to determine a waste nonhazardous . . . rather he may review the processes and materials spent in the generation of that waste . . . The deletion of the retesting requirements that were contained in the proposed regulations does not relieve the generator from his continuing responsibility to know whether his wastes are hazardous. If there a significant change in the materials, processes, or operations which indicate that the waste has become hazardous, the generator must repeat the determination.3

The benefit of relying on general knowledge to determine whether a waste is subject to RCRA Subtitle C is that it avoids the time and expense of testing for each waste stream, both of which can be considerable. EPA recognizes the value of using generator knowledge:

[I]f a waste does not contain a [toxic constituent under RCRA] a decision that the waste does not exhibit the characteristic can reliably be made without testing . . . EPA does not expect to undertake testing when it can otherwise be determined with reasonable

<sup>&</sup>lt;sup>2</sup> 40 C.F.R. § 262.11(c)(1), (2).

<sup>3 45</sup> Fed. Reg. 12727 (Feb. 26, 1980).

certainty whether or not the waste will exhibit a characteristic. 4

EPA and FDEP rules do not, however, set out any criteria on which a generator may rely in using "knowledge of materials or processes used" to determine whether a waste must be managed as hazardous. According to EPA, all that is required is that a generator's belief that the waste is hazardous or non-hazardous be "based on an objective review of the materials and processes involved in the generation of the waste." 5

Nor has case law provided any additional standards. In an administrative appeal In The Matter Of Humpko Products<sup>6</sup> the EPA administrative law judge required no definitive documentation of the generator's use of process knowledge:

[T]he requirement of 40 C.F.R. § 262.11 is simply that a determination be made as to whether the waste is hazardous. One must look elsewhere in the regulations for the waste management requirements which flow from that determination. It is concluded that Humpko determined [its wastes] were hazardous by applying knowledge of the characteristics of the waste as permitted by § 262.11.7

Thus no legal authority identifies what documentation is necessary to substantiate waste characterization based on process

<sup>55</sup> Fed. Reg. 8666, 8762 (March 8, 1990) (replying to comments on proposed rule for the National Contingency Plan under the Comprehensive Environmental Response, Compensation and Liability Act ("CERCLA"), 42 U.S.C. §§ 9601-9675, concerning how to determine whether a RCRA hazardous waste was present at a CERCLA site.)

<sup>&</sup>lt;sup>5</sup> 45 Fed. Reg. 12724, 12727 (Feb. 26, 1980).

<sup>6</sup> No. V-W-84-R-014 (EPA ALJ Mar. 7, 1985).

<sup>&#</sup>x27; Id.

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knowledge. We can only discern from EPA pronouncements that the use of generator knowledge is intended to be an objective, not subjective determination, which must be made in good faith. The sufficiency of the determination must necessarily rest on a case-by-case review.

B. Sufficiency of IPC's Characterization of Eleven Truckloads of Used Oil Tank Bottoms

Contrary to the assertion in the Warning Letter, a waste determination in accordance with 40 C.F.R. § 262.11 was made on the eleven truckloads of soil, sand and sludge before shipment to Clark Environmental in March, 1997.

As the generator, IPC determined that the waste was non-hazardous by using knowledge of the materials and the processes involved. The determination and its correctness are based on the following:

1. The eleven shipments of soil, sand and sludge were generated from the clean-out of used oil tanks and railcars. On June 28, 1993, IPC had voluntarily initiated a 5-month program of extensive laboratory analysis of sump waste and pump filter basket lint. Such sump waste and pump filter basket lint consist of the larger particles which settle from or are filtered out of used oil as it is pumped to the receiving tank. The soil, sand and sludge removed by the tank clean-out is the same essential material, just smaller particles not removed by the sump and filter. Consequently, the extensive analysis of the sump waste and pump filter basket lint provides an objective basis for making a waste determination for the tank bottoms.

As shown in the "Final Report, Waste Characterization Program," prepared by Edward E. Clark, Engineers-Scientists, Inc. on January 5, 1994 (Attachment 1) the sludge samples were collected and tested using the TCLP

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45 Fed. Reg. 12724, 12727 (Feb. 26, 1980).

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method. FDEP, on one occasion, split samples. A comparison of the analysis by the Spectrum Lab (utilized by Clark, Engineers-Scientists) and the FDEP lab show no significant differences:

The FDEP results were consistent with previously obtained results; the combined sump waste and pump filter basket lint are classified as non-hazardous, as defined by TCLP criteria.

Although not required, in 1994 and in every year since, IPC has re-collected and re-analyzed the sump waste and pump filter basket lint. The results of this annual re-evaluation have confirmed the non-hazardous characterization. (Attachment 2.) In December of 1997, the sump waste and pump filter basket lint were again sampled and analyzed, and again shown to be non-hazardous. (Attachment 3.)

Finally, in December 1997, IPC tested a sludge sample removed from a railcar clean-out. The lab analysis confirmed that the sludge was not hazardous. (Attachment 4.)

 International Petroleum Corporation is a subsidiary of World Fuel Services, Inc., which is the parent company of two other used oil recycling facilities: International Petroleum Corp. of Delaware, at 505 South Market Street,

Final Report, Waste Characterization Program, January 5, 1994, pp. 3, 4.

Such annual re-evaluation is not required. <u>See</u>, Letter from U.S. EPA David Bussard to Mark Clements, dated February 26, 1980: "If the waste proves non-hazardous, as long as the process or type of material . . . doesn't change, further testing should be unnecessary as documented generator knowledge has proven it does not pose a hazard." Also, in promulgating its 1980 RCRA regulations, EPA deleted the proposed requirement for periodic or annual waste retesting and re-evaluation, 45 Fed. Reg. 12724, 12727.

Wilmington, Delaware; and International Petroleum Corporation, at 14890 Intracoastal Drive, New Orleans, Louisiana.

The Delaware facility, generating similar wastes, had its filtered debris and tank bottoms tested using the TCLP method in October 1995; microseparator debris, was tested in October 1996; and microseparator/filtered debris and tank bottoms were tested in October 1997. In each case, the waste was shown to be non-hazardous. (Attachment 5.)

The Louisiana facility collected used oil tank bottoms and submitted them for waste characterization. Lab analysis in June 1995 confirmed that it was non-hazardous. (Attachment 6.)

3. Over the years, IPC has relied on expert advice from David A certified California environmental assessor, Mr. Strahorn specializes in consulting with used oil recycling facilities throughout the nation, and has developed a national reputation in this area. shipment of tank bottoms in March 1997, he had specifically informed Garry Allen, president of IPC, that industry-wide data, together with data from other World Fuel Services facilities, established that soil, sand and sludge of the kind generated from tank and railcar clean-out had shown to be non-hazardous. He further recommended that with such process knowledge there was no need to submit such waste to TCLP testing. Based on his analysis of industry-wide data, "[u] sed oil tank bottoms never fail TCLP." (Attachment 7.)

Taken as a whole, these documents show that IPC's determination that the tank and railcar bottoms were non-hazardous was based on an "objective review of the materials and processes involved in the generation of the waste," 11 The determination was made in good faith

<sup>45</sup> Fed. Reg. 12724, 12727 (Feb. 26, 1980).

and undoubtedly accurate. Since no violation of 40 C.F.R. § 262.11 occurred, no penalty is warranted.

### II. TRANSPORT AND PROCESSING OF USED ANTIFREEZE

#### A. Alleged RCRA Violations

The remainder of the proposed penalty<sup>12</sup> (\$29,000.00) is based on alleged RCRA violations relating to the transport, storage, and treatment of used antifreeze from eight generators. The Warning Letter asserts that this particular antifreeze was hazardous under RCRA. Hence, it was not transported as required by 40 C.F.R. § 263.20; and it was stored and treated by IPC without the required hazardous waste permit and notification required by § 403.727(3)(b).

According to the Warning Letter, twenty-one shipments of hazardous waste antifreeze were accepted and processed by IPC between December 12, 1995 and September 1997, as set out below:

#	Generator	Date of Analysis	Laboratory	Contaminant	Results	Pickups
1.	Daytona Linc/ Merc	5/29/97	Progress Env.	Tetrachloro	.891 mg/L	1
2.	Halifax Ford	7/14/97	Progress	Tetrachloro	.714 mg/L	3
3.	Honda,Merritt Island	1/28/97	Enco	Tetrachloro	.700 mg/L	3

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Except for a \$150.00 proposed penalty for alleged violation of 40 C.F.R. § 279.22(c) (failure to label container "used oil"). The container was a 25-gallon keg beneath a filter inspection/draining table. Used oil from the filters was drained to and pumped from the keg as part of the process; it was not a fixed storage unit. The day before the FDEP RCRA inspection an IPC employee had replaced the existing keg, properly labeled, with a new keg for housekeeping purposes. A new "used oil" label was to be attached the next day. Nevertheless, without admitting a violation, IPC is willing to pay the \$150.00 penalty to resolve the matter.

4.	Jim's Import Auto	8/1/97	Progress	Lead	10.0 mg/L	2
5.	Mazda Village	12/12/95	Enco	Trichloro Tetrachloro	11.3 mg/L 18.4 mg/L	5
6.	McNamara Pontiac	3/5/97	Progress	Tetrachloro	1.41 mg/L	3
7.	Moody Truck Center	4/25/97	Progress	Tetrachloro	1.24 mg/L	2
8.	Florida Clark Lift	8/17/97	HOWCO	Lead	38.1 mg/L	2

Each of these alleged shipments of hazardous antifreeze are addressed separately in this response:

1. <u>Daytona Linc/Merc - Generator</u>. The Warning Letter alleges that an analysis by Progress Environmental Laboratories dated May 29, 1997 showed that the used antifreeze from this generator exhibited the toxicity characteristic for Tetrachloroethene.

Under RCRA and state rules, a solid waste is a hazardous waste if it exhibits the toxicity characteristic using the Toxicity Characteristic Leaching Procedure ("TCLP"), Test Method 1311. The procedure is specifically defined in "Test Methods for Evaluating Solid Wastes, Physical/Chemical Methods," EPA Publication SW-846. If the extract from a representative sample of the waste contains a contaminant listed in the Table found in § 261.24 at a concentration equal to or greater than the value in the Table, the waste, by definition, exhibits the toxicity characteristic and is hazardous. Importantly, however, "[w]here the waste contains less than 0.5% filterable solids, the waste itself, after filtering, using the methodology outlined in Method 1311 is considered to be extract for the purpose of the section." (e.s.) Conversely, and necessarily,

<sup>40</sup> C.F.R. § 261.24(a).

<sup>14</sup> Id.

Id.

if these specified procedures are <u>not</u> followed the resulting concentration of a contaminant <u>cannot</u> be used to determine whether the waste exhibits the toxicity characteristic.

But that is, nonetheless, what the Warning Letter attempts to do. The Progress Lab analysis and subsequent explanatory letter (Attachment 8) show that the May 29, 1997 analysis indicating a Tetrachloroethene concentration of .891 mg/L is ineffectual for the purpose of determining whether the waste is hazardous under RCRA. Method 8010 EPA was used, which measures the concentrations of a chemical in a medium. The TCLP test specified in § 261.24 was not used. Moreover, the lab analysis does not show that the waste contained less than 0.5% filterable solids. But even if it did, the toxicity characteristic was not exhibited because the waste was not filtered using the methodology set out in § 261.24.

Subsequent communication between IPC and Vince Giampa, Director of the Progress Lab, has confirmed that none of the samples identified in the Warning Letter as analyzed by Progress Lab were filtered using the methodology outlined in Method 1311. According to Mr. Giampo, the results of the "totals" analysis cannot, therefore, be considered the extract for purposes of determining the toxicity characteristic in accordance with 40 C.F.R. § 261.24.

Results vary significantly, depending on the method used. For comparative purposes, on August 6 and 7, 1998, Progress Lab analyzed samples of used antifreeze from two generators using "totals" (unfiltered) and the TCLP test. The amount of Tetrachloroethene detected using the "totals" method was almost 10-fold the amount detected using the TCLP test. (Attachment 9.)

Two additional documents demonstrate that the single shipment of used antifreeze on June 26, 1997 was not hazardous. The generator, in accordance with its duties under 40 C.F.R. § 262.11 certified in writing that the used antifreeze was not a hazardous waste under RCRA; that it did not exhibit a hazardous characteristic as defined in 40 C.F.R. § 261; and that it was classified as non-hazardous in its state of generation. (Attachment 10.) On the manifest which accompanied the shipment the generator also certified that the used

antifreeze had not been mixed with hazardous waste. (Attachment 11.) Furthermore, used antifreeze generated by the same facility was tested using the correct TCLP, EPA Method 1311, on October 10, 1997 and shown to be non-hazardous. (Tetrachloroethene had a concentration of less than .01 mg/L; the TCLP regulatory limit is .7 mg/L.) (Attachment 12.)

Because the shipment of June 26 was <u>not</u> shown to be hazardous waste as defined by RCRA regulations, and FDEP rules, and the generator had made a waste determination and certified that the used antifreeze was non-hazardous, the alleged violations are unsubstantiated.

2. Halifax Ford Mercury - Generator. The Warning Letter alleges that a Progress Environmental Laboratory analysis of this generator's used antifreeze dated July 14, 1997 indicated the RCRA toxicity characteristic for Tetrachloroethene (.714 mg/L) and that there were three pickups of hazardous antifreeze. These allegations are unsubstantiated.

The laboratory analysis was for total concentrations, using EPA Method 8010 (Attachment 13); the TCLP test, Method 1311, was not run. The lab analysis does not show that the used antifreeze contained less than 0.5% filterable solids and Progress Lab admits that the samples were not filtered. (Attachments 8, 13.) The generator had also certified, under threat of criminal prosecution, that the antifreeze was non-hazardous. (Attachment 14.) On the manifests which accompanied each of these shipments, the generator certified that the used antifreeze had not been mixed with hazardous waste. (Attachment 15.) A true TCLP test performed on used antifreeze two months later showed concentrations of Tetrachloroethene at less than 0.01 mg/L (Attachment 16.)

3. Honda, Merritt Island - Generator. Here, three pickups of hazardous waste antifreeze are alleged based on a single Enco Lab analysis dated January 28, 1997. The analysis indicated total Tetrachloroethene at .700 mg/L. (The TCLP regulatory threshold is .700 mg/L or greater.)

The allegations are unsubstantiated. The value for Tetrachloroethene (at .700 mg/L, the lowest possible exceedance) is undercut by the Quality Control Data which accompanied the analysis. (Attachment 17.) The quality control value for Tetrachloroethene was identified as "exceed[ing] [the] established limit for precision."

Moreover, as discussed later, used antifreeze does not normally exhibit the toxicity characteristic unless it has been improperly mixed with hazardous waste. For each of these shipments, the generator had certified that the antifreeze had not been mixed with hazardous waste. (Attachment 18.)

Finally, there is strong evidence that Honda, Merritt Island was a Conditionally Exempt Small Quantity Generator<sup>16</sup> at the time of the January 15, 1997 pick-up and for the next four months. (Attachments 18, 19.) Such generators, and the small amounts of hazardous waste they generate, are not subject to regulation under 40 C.F.R. Parts 262-266.

4. Jim's Import Auto - Generator. Two pickups of hazardous waste antifreeze are alleged based on a Progress Laboratory analysis dated August 1, 1997. The waste is alleged to have exhibited the toxicity characteristic for lead. (10.0 mg/L was detected; the 40 C.F.R. § 261.4 regulatory threshold is 5.0 mg/L.)

The allegations are unsubstantiated. First, the Progress Lab analysis shows that TCLP Method 1311 was not used. Rather, total lead was run using Method 8010. (Attachment 20.) The analysis does not indicate less than 0.5% filterable solids; and even if it did the "totals" analysis could not be used to determine the toxicity characteristic because the waste was not filtered as required by § 261.24. (Attachment 8, 20.)

This generator had certified under threat of criminal prosecution, that its used antifreeze was non-hazardous (Attachment

A Conditionally Exempt Small Quantity Generator generates less than 100 kg (about 25 gallons) in the particular calendar month. <u>See</u>, 40 C.F.R. § 261.5.

21), and it had signed a manifest for each shipment certifying that the antifreeze had not been mixed with hazardous waste. (Attachment 22.) (Used antifreeze does not ordinarily exhibit a hazardous characteristic unless it is mixed with a hazardous waste.)

Second, and dispositive, is the fact that Jim's Import Auto was at that time a Conditionally Exempt Small Quantity Generator not subject to regulation under 40 C.F.R. Parts 262-266.

Here, the IPC pickup history shows that Jim's Import Auto, although an episodic generator, typically generated less than 25 gallons a month prior to September 4, 1997. (Attachment 23.) Moreover, IPC's generator profile sheet, prepared when the customer account was opened in July 1997, identified the generator as a Conditionally Exempt Small Quantity Generator. (Attachment 21.)

Consistent with Jim's Import Auto's Conditionally Exempt Small Quantity Generator status, it had not been assigned an EPA ID number (required for all generators other than Conditionally Exempt Small Quantity) and was not found on FDEP's list of Small Quantity Generators.

5. Mazda Village - Generator. Based on an Enco lab analysis dated December 12, 1995, the Warning Letter asserts that there were five pickups of hazardous waste antifreeze. According to the Letter, the used antifreeze exhibited the toxicity characteristic for Trichloroethene and Tetrachloroethene. The analysis shows that using EPA Method 8010 - TCLP 8010, Trichloroethene was detected at 11.3 mg/L (compared to the § 261.24 regulatory limit of .5 mg/L) and Tetrachloroethene at 18.4 (compared the regulatory limit of .7 mg/L). (Attachment 24.) The analysis does not, on its face, show that the lab analysis - performed over three years ago - used Method 1311; that the used antifreeze contained less than .5% filterable solids; or that - if it did - the waste was analyzed only after filtering using the methodology outlined in Method 1311.17

<sup>40</sup> C.F.R. § 261.4(a).

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Nonetheless, the Enco analysis was marked with the notation "TCE/Tetrachloro hazardous — do not pick-up" by IPC's independent consultant. The IPC driver was unaware of the results and the consultant's instructions and prematurely picked up the used antifreeze on the same day the lab report was issued.

IPC accepts responsibility for this communication failure and is agreeable to paying a penalty of \$1380 in settlement of and without admitting the allegations relating to the pick-up of used antifreeze on December 12, 1995. (The amount is calculated as follows: \$29,000 divided by 21 shipments = \$1380/pick-up.)

The alleged pick-ups of hazardous waste antifreeze on four subsequent dates (March 14, 1996; May 14, 1996; July 24, 1996; and September 19, 1996) are, however, unsubstantiated. In each case, the generator certified that the used antifreeze had not been mixed with hazardous waste so there was no basis to believe that the antifreeze was hazardous. (Attachment 25.) Retesting by Enco of newly generated used antifreeze on December 20, 1996 confirmed that the antifreeze was non-hazardous. (Attachment 26.)

6. McNamara Pontiac - Generator. Three pick-ups of hazardous waste antifreeze are alleged based on a Progress Lab analysis of March 5, 1997. The toxicity characteristic for Tetrachloroethene is alleged to have been exhibited. (Attachment 27.) The allegations are unsubstantiated.

As was Progress Lab's habit, the testing method specified by 40 C.F.R. § 261.24(a) was not used. So the waste cannot, as a matter of law, be deemed to have exhibited the toxicity characteristic. Instead of using the method appropriate to the toxicity characteristic, Progress Lab used EPA Method 8010 to run total concentrations, without filtering using Method 1311 and without a determination that the waste contained less than 0.5% filterable solids.

Moreover, the generator certified on February 26, 1997, under penalties of criminal prosecution, that its used antifreeze was nonhazardous under RCRA; that the waste did not exhibit a hazardous

characteristic as defined in 40 C.F.R. 261; and that the waste was classified as non-hazardous in its state of generation. 28.) Each of the three shipments was accompanied by a manifest, with the generator certifying that its antifreeze had not been mixed with hazardous waste. (Attachment 29.) Absent such mixture, antifreeze would not be expected to exhibit the toxicity characteristic. A TCLP test of later-generated used antifreeze, performed by Phosolab on September 30, 1997, confirmed that this generator's used antifreeze is non-hazardous. (Attachment 30.)

7. Moody Truck Center - Generator. Two pick-ups of hazardous waste antifreeze are alleged based on a Progress Lab analysis dated April 25, 1997. (Tetrachloroethene was detected at 1.24 mg/L.) The allegations are unfounded because, as previously stated, Progress Lab analysis were run only for "totals" using Method 8010. No filtering in accordance with Method 1311 was done. (Attachments 8, 31.)

The generator also certified, under penalties of criminal prosecution that the used antifreeze was non-hazardous under RCRA. (Attachment 32.) Each shipment was accompanied by a manifest, certifying that the antifreeze had not been mixed with hazardous waste. (Attachment 33.) In the absence of such mixing the used antifreeze would not be expected to exhibit the toxicity characteristic. A subsequent TCLP testing performed in accordance with § 261.24(a) confirmed that the used antifreeze was non-hazardous. (Attachment 34.)

**8. Florida Clark Lift - Generator**. Two pick-ups of hazardous waste antifreeze are alleged based on an analysis dated August 17, 1997 by HOWCO lab. (Lead was detected at 38.1 mg/L.)

The allegations are unsubstantiated. The HOWCO analysis was performed on August 17, 1994, not 1997, as alleged. (Attachment 35.) It appears to have been an analysis for "totals", not a TCLP test in accordance with § 261.24(a). There is no indication that the sample was filtered using Method 1311 or that the waste contained less than 0.5% filterable solids. Thus, the waste, itself, could not be considered the extract in accordance with § 261.24(a).

Moreover, the generator profile sheet completed when Florida Clark Lift became an IPC customer on January 7, 1997, shows that the generator certified, under penalties of criminal prosecution, that the used antifreeze was non-hazardous under RCRA; that it had not been assigned an EPA identification number; and that it was a Conditionally Exempt Small Quantity Generator. (Attachment 36.) Thus, hazardous waste generated by it was not subject to regulation under Parts 262-266. Florida Clark Lift has notified FDEP that it is a Conditionally Exempt Small Quantity Generator and it has not been assigned an EPA ID number — a prerequisite if it was other than a Conditionally Exempt Small Quantity Generator.

Finally, the generator certified on each shipping manifest that its used antifreeze had not been mixed with hazardous waste. (Attachment 37.) Absent such mixing, the antifreeze would not be expected to exhibit the toxicity characteristic.

#### B. "Totals" Compared to TCLP Regulatory Levels

As mentioned earlier, a toxicity characteristic determination under § 261.24 typically requires application of the TCLP test followed by analysis of the TCLP extract. EPA has recognized, however, that a total waste analysis can be useful as a convenient and low cost screening device.

If a total analysis of the waste demonstrates that individual analytes are not present in the waste, or that they are present but at such low concentrations that the appropriate regulatory levels could not possibly be exceeded, the TCLP need not be run.<sup>19</sup>

Only wastes containing less than 0.5% dry solids do not require extraction. The waste, after filtration as specified in Method 1311,

<sup>&</sup>lt;sup>8</sup> 40 C.F.R. § 261.5(b).

EPA Office of Solid Waste, Monthly Hotline Report, EPA 540-R-94-005a; NTIS: PB 94-922401.

is defined as the TCLP extract and the concentration in the resulting filtrate can be compared to the regulatory limits of § 261.24.20 If the waste is not filtered in accordance with Method 1311, it cannot be considered the extract and compared with the regulatory limits of § 261.4.

Without proper filtration, a "totals" analysis can provide "worst case" concentrations of chemicals listed on the Table of §261.24. It is useful because if the concentrations are low enough one can be certain that the waste would not "fail" a TCLP test. In contrast, high "totals" cannot be used to establish that the waste would "fail" a TCLP test. The plain wording of § 261.24 would not allow it; and a "totals" analysis can result in a concentration more than 10-fold the concentration from a TCLP test. (Attachment 9.)

#### C. Used Antifreeze Is Typically Non-Hazardous

When a generator determines that its used antifreeze is non-hazardous under RCRA (using process knowledge), such a determination is consistent with the results of numerous governmental and industry studies and with EPA's proposed national policy statement on the subject.

On April 23, 1998, EPA published in the Federal Register a "Request for Comments on Proposed Statement of Policy Regarding Spent Antifreeze." The notice provided:

EPA is currently considering issuing a statement announcing that data available to the Agency indicates that spent antifreeze rarely fails the Toxicity Characteristic Leaching Procedure (TCLP) test. TCLP is used for determining whether or not a secondary material that is a solid waste is subject to regulation as a hazardous waste by virtue of exhibiting a "toxicity characteristic" (TC). The purpose of such a statement and any supporting information

<sup>.0</sup> Id.

would be to assist generators in determining whether their spent antifreeze exhibits a hazardous waste characteristic. In today's notice, EPA is providing the data and qualitative information that we would use to support such a finding.<sup>21</sup>

EPA explained that such a position statement would assist a generator in making waste determinations required by § 262.11(c) "as to whether the spent antifreeze it generates exhibits a hazardous waste characteristic." Noting that since a generator may either test the waste or rely on knowledge of the waste in light of the materials and processes used, "EPA's statement on this issue would assist the generators by directing them to a compilation of data which they would rely on or give weight to when making their hazardous waste determination." 23

EPA cited numerous studies and compilations of raw data on which it based its determination. One antifreeze study was conducted by Dames and Moore for the New Jersey Automobile Dealers Association. The study concluded that its analysis of spent antifreeze collected from auto dealers indicates that antifreeze "lacks the characteristic of a hazardous waste." (Attachment 38.)

In its determination, EPA also relied on a request for regulatory clarification dated October 14, 1990 from Lynn L. Bergeson on behalf of Union Carbide Corporation and Ecogard, Inc.<sup>25</sup> This submittal included a Pilot Study analyzing spent antifreeze collected from 96 auto service centers. The study limited characterization pursuant to § 262.11 to TCLP lead levels because — based on generator

<sup>63</sup> Fed. Reg. 20187 (April 23, 1998).

<sup>1</sup>d. at 20188.

<sup>&</sup>lt;sup>23</sup> Id.

<sup>24</sup> Id.

<sup>25
&</sup>lt;u>Id.</u>, RCRA Document No. S0025.

knowledge — there were no chlorinated solvents in the antifreeze. The TCLP testing detected no concentrations meeting or exceeding the 5.0 mg/L regulatory limit for lead set out in § 261.24. (Attachment 39.)

Also included in the docket, and relied on by EPA, was a position statement by the State of New Jersey Department of Environmental Protection on the management of used antifreeze. (Attachment 40.) The position statement, dated July 20, 1994, was based on a study performed by the New Jersey Automobile Dealers Association. The used antifreeze evaluated in the study was analyzed for various parameters including TCLP metals, TCLP volatiles, corrosivity and ignitability. "When samples were taken from antifreeze which was not cross contaminated the study revealed that no characteristics exceeded regulatory hazardous waste levels." 26

EPA also relied on information submitted by John J. Rigby on behalf of the Antifreeze Coalition.<sup>27</sup> These documents, including memoranda and analysis by EPA and the Federal Aviation Administration, show that ethylene glycol<sup>28</sup> presents little environmental concern and that widespread changes in automobile radiators (to plastic and aluminum tanks) had significantly decreased the possibility of lead contamination. (Attachment 41.)

## USED ANTIFREEZE SHOULD BE REGULATED AS USED OIL

The management of used oil in Florida is governed by 40 C.F.R. Part 279 and Chapters 62-701 and 62-710, Florida Administrative Code. "Used oil" is defined as:

<sup>&</sup>lt;u>Id</u>., p. 1.

<sup>27</sup> Id., RCRA Docket No. S0014, S0019.

Typical antifreeze purchased over the counter contains 80-95% ethylene glycol. (Attachment 38, Waste Antifreeze Characterization Study, p. 1, Washington State Department of Ecology.)

Any oil that has been refined from crude oil, or any synthetic oil that has been used and as a result of such use is contaminated by physical or chemical impurities.<sup>29</sup>

FDEP recently declared that "[a]ny material which meets this definition  $\underline{\text{must}}$  be managed as used oil." (e.s.)

In interpreting the virtually identical federal and state definitions of "used oil," FDEP has determined that:

[u]sed oil includes synthetic oils, transmission and brake fluids, lubricating greases, etc. Used oil does not include products derived from vegetable or animal fat.<sup>31</sup>

EPA and FDEP interpret the definition of used oil as based on three criteria: origin, use, and contamination.

First, the used oil must be derived from crude oil or synthetic oil (i.e., derived from coal, shale, or polymers). Examples of crude-oil derived oils or synthetic oils are motor oil, mineral oil, laminating surface agents and metalworking oils. The origin-based definition would not include animal or vegetable oils. Second, the oil must have been used as a lubricant, coolant, heat (non-contact) transfer fluid, hydraulic fluid, or for a similar use. Lubricants include, but are not limited to, used motor oil, metalworking lubricants, and emulsions. An example of a hydraulic fluid is

<sup>&</sup>lt;sup>29</sup> 40 C.F.R. § 279.1; also see § 62-701.200(117), F.A.C.

 $<sup>$^{30}$</sup>$  FDEP "Florida Fact Sheet On The Management of Used Oil and Used Oil Filters," dated June 2, 1997.

Id.

transmission fluid. Heat transfer fluids can be materials such as coolants, heating media, refrigeration oils, and electrical insulation oils. Authorized states or regions determine what is considered a "similar use" on a site-specific basis according to whether the material is used and managed in a manner consistent with Part 279 (e.g., used as a buoyant). Third, the used oil must be contaminated by physical (e.g., high water content) or chemical (e.g., lead, halogens, or other hazardous constituents) impurities as a result of use.<sup>32</sup>

Although EPA does not yet consider used antifreeze as falling within the definition of used oil, it provides no explanation for its failure to do so. Indeed, EPA acknowledges that "it is <u>possible</u> for antifreeze to meet all three criteria for used oil." (e.s.)

It is more than "possible"; it is compelled by the broad wording of the definition. At IPC's request, David Strahorn of Professional Resource Management — an expert on management and processing of used oil — measured antifreeze against the three EPA criteria. He determined that used antifreeze qualifies, concluding that "used antifreeze meets all of EPA's criteria for the definition of used oil:"

#### Used Oil must be derived from crude oil or synthetic oil.

Antifreeze is ethylene glycol or propylene glycol and additives. Ethylene glycol is produced from ethylene which is produced from naphtha which is produced from crude oil. Used antifreeze meets this test.

Monthly RCRA Hotline Report, April 1997, EPA 530R-97-005d.

<sup>&</sup>lt;sup>33</sup> Id.

> 2. Used Oil must have been used as a lubricant, coolant, heat transfer fluid, hydraulic fluid, or for a similar use.

> Used antifreeze was used as an engine coolant and as a heat transfer fluid. Used antifreeze meets this second test.

3. Used Oil must be contaminated by physical or chemical impurities as a result of use.

Used antifreeze was contaminated by rust, wear metals, and degraded additives as a result of its use. Used antifreeze meets this last test.

(Attachment 42.)

Mr. Strahorn also noted that:

[E]thylene is chemically related to many materials that are generally considered Used Oil. For example, brake fluid is composed primarily of triethylene glycol (a byproduct of making ethylene glycol) and ethylene glycol mono butyl ether (made from ethylene glycol and butyl alcohol). Also, ethylene glycol is a primary starting material in the manufacture of synthetic oils like polyethelene glycols which are used in specialty lubricants.

(Attachment 42.)

This conclusion is supported by EPA's public justification for including synthetic oils in the definition of "used oil." EPA compared synthetic oils (not petroleum-based), and oils that are petroleum based but are water soluble, such as metalworking oils/fluids, and those that are polymer-type, concluding that "all

<sup>&</sup>lt;sup>34</sup> 57 Fed. Reg. 41573, 41575 (Sept. 10, 1992).

used oils, including synthetic oils, should be regulated in a similar fashion . . .  $^{\prime\prime}$  35

EPA declined to list specific types of materials in the used oil definition, opting instead for a definition which it believed:

covers the majority of oils used as lubricants, coolants (non-contact heat transfer fluids), emulsions, and for similar uses and are likely to get contaminated through use.<sup>36</sup>

The Department has a legal obligation to give effect to the stated purpose and broad language of its "used oil" definition and to regulate used antifreeze as falling within it. Used oil and antifreeze come from the same source: motor vehicles. The comprehensive Used Oil Management Standards codified in 40 C.F.R. Part 279 have proven workable and adequate to protect human health and the environment. These standards would apply whether or not the used antifreeze exhibited a hazardous characteristic. The would be presumed that the used antifreeze is to be recycled unless the handler disposes of it or transports it for disposal.

If it were mixed with a listed hazardous waste the mixture would be regulated as hazardous waste under Subtitle C.<sup>39</sup> The "rebuttable presumption" would also apply.<sup>40</sup> If the antifreeze contained more than 1000 parts per million of total halogens, it would be presumed to have been mixed with a regulated halogenated hazardous waste and

Id. at 41574.

Id. at 41574.

See, 40 C.F.R. § 279.10(a).

<sup>&</sup>lt;sup>38</sup> 40 C.F.R. § 279.10.

<sup>&</sup>lt;sup>39</sup> 40 C.F.R. § 279.10(b)(1).

<sup>40</sup> C.F.R. § 279.10(b)(1)(ii).

therefore be subject to regulation as hazardous waste under Subtitle C.

Since used antifreeze falls squarely within the definition of used oil the regulatory standards found in 40 C.F.R. Part 279 and state analogues, not RCRA Subtitle C, apply. The allegations of the Warning Letter with regard to the pick-up of used antifreeze from eight generators would regulate used antifreeze by the wrong standards.

## IV. INTERNATIONAL PETROLEUM CORPORATION RECYCLES USED ANTIFREEZE

The International Petroleum re-refinery is a legitimate recycler of used antifreeze. Just as used oil is processed into fuel and recycled by burning for energy recovery, 41 so too is used antifreeze.

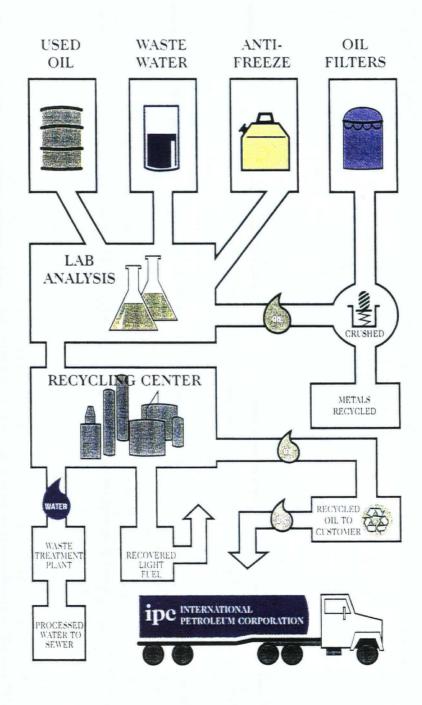
Used antifreeze, i.e., ethylene glycol has a bonafide, legitimate and beneficial use as fuel. It has a heating value of 8200 Btu/lb, $^{42}$  well above the 5000 Btu/lb criterion used by EPA to determine whether burning activities constitute legitimate recycling. $^{43}$ 

<sup>40</sup> C.F.R. § 279.11; RCRA § 1004, (defining "recycled oil" as including used oil being re-refined into fuel); 40 C.F.R. § 261.6(a) (4) (recycled used oil includes used oil which is burned for energy recovery); § 62-710.210(1), F.A.C., incorporating § 62-701.200(94) ("recycling" means a process by which materials are processed or reused or returned to use in the form of raw materials or products; § 62-710.210(2), F.A.C., incorporating the definitions of 40 C.F.R. Part 279.

Attachment 42, p. 1.

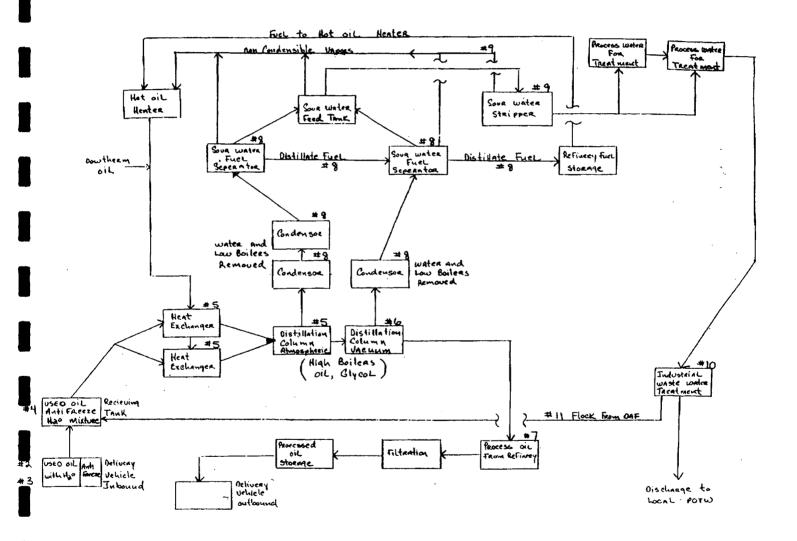
EPA Recycling Policy, 48 Fed. Reg. 11157, 11159 (March 16, 1983).

A general flow chart for the International Petroleum refinery may be depicted as follows:



WATKINS, TOMASELLO & CALEEN, P.A.

A more detailed block diagram of the process is set out below:



As shown above, antifreeze (glycol) and "used oil" are pumped to a feed tank and are the feedstock for the distillation process. Antifreeze has a boiling point of approximately 198 degrees C (around 387 degrees F). The typical bottoms temperature of the atmospheric distillation column is kept below 250 degrees F. The used oil, antifreeze, water, and "light ends" mixture enters the atmospheric column where the water turns into steam and the "light ends or low boilers" turn into vapor. Those liquids with a boiling point above 250 degrees F are left as a liquid and are pumped to the vacuum column where when the vacuum is applied additional "low boilers" and water are removed. The remaining oil (which contains the unboiled glycol) is then cooled and pumped into a storage tank for testing and sold as on-specification fuel burned for energy recovery.

The complete used antifreeze recycling process — from pick-up to use as a valuable fuel -- consists of the following steps:

- 1. Antifreeze (glycol) is pumped into an International Oil Service tank truck.
- Truck is received at the Plant City Tank Farm.
- 3. The truck contains "used oil" in one compartment and used antifreeze/water in another.
- 4. Both the "used oil" and glycol are pumped into a feed tank which has a high volume circulating pump to keep the feedstock for the refinery blended. Blending keeps the refinery operating at a level water/oil mixture, which is necessary for a smooth flow rate.
- 5. This feedstock is pumped to a heat exchanger, heated in the exchanger and then flows to an atmospheric distillation column. Column temperatures are kept to a

minimum in an effort to remove most of the water and those low boilers that typically boil at or below that of water. Note: The residual oil must have a flash point in excess of 100 degrees F. to meet EPA guidelines.

- 6. The partially distilled feedstock is then pumped to a vacuum distillation column where due to loss of heat to the atmosphere from the "skin" of the columns, pumps, valves and piping, it is processed at a lower temperature than the atmospheric column. A vacuum is pulled allowing more water to be evaporated from the feed stock along with a small amount of additional low boilers.
- 7. The remaining product (dehydrated used oil and glycol along with any other high boilers) is cooled through chilling exchangers and pumped into a storage tank for testing to meet EPA and FDEP used oil specifications for burning before it is shipped to a customer.
- 8. Low boilers and water extracted as vapor from both the atmospheric and vacuum distillation system are chilled back to a liquid and separated by gravity to remove the low boilers for use as a fuel to fire the hot oil heater furnace.
- 9. The "distilled" water phase is pumped to a sour water stripper column where it is heated with steam to "steam strip" remaining low boilers from the water. These "steam stripped" low boilers are piped back to the condensing tank for use

> as a liquid fuel or piped as a vapor directly to a designated burner in the furnace to be burned for energy recovery.

- 10. All low boilers are burned for energy recovery. All "distilled" and "steam stripped" waters are treated in a dissolved air flotation system (D.A.F.) before discharge by permit to the City of Plant City P.O.T.W.
- 11. All "FLOC" which comes off the D.A.F. is pumped back to the feed tank for the refinery.

#### ν.

# BY AN ILLICIT UNPROMULGATED RULE THE DEPARTMENT HAS IMPROPERLY RELIEVED USED ANTIFREEZE GENERATORS OF THEIR RCRA DUTY TO MAKE A WASTE DETERMINATION

On June 14, 1996, FDEP provided copies of a "Draft Guidance on the Management of Antifreeze Destined for Recycling" to antifreeze recyclers and handlers. (Attachment 43.) In the letter accompanying the "Draft Guidelines," FDEP announced that while it was in the process of adopting rules to add hazardous waste antifreeze to the list of "universal wastes" it would be issuing interim guidelines to promote collection and recycling.

These guidelines were incorporated in a so-called "Florida Fact Sheet On The Best Management Practices For Managing Antifreeze Destined For Recycling." (Attachment 44.) The guidelines, expressed in mandatory terms, contain serious omissions or errors which adversely affect the substantial interests of International Petroleum. First, they improperly limited "recycling" of used antifreeze to reclamation, rejecting other forms of recycling such as burning for energy recovery. Second, they purported to relieve the generators of their duty to make the waste determinations as required by 40 C.F.R. § 262.11. As explained by the accompanying memorandum

from the Director of the Division of Waste Management, dated August 6, 1996:

One important provision of these best management practices is that a generator or handler that is recycling used antifreeze on-site or sending it off-site for recycling will not be requested to make a hazardous waste determination as required by 40 C.F.R. § 262.11.

(Attachment 45.)

The attempt to restrict "recycling" of used antifreeze to reclamation is not supported or required by any statute or FDEP rule, nor consistent with the Department's overall recycling program. Contrary to Section 120.54(1)(a), Florida Statutes (1997), FDEP's policy of favoring one form of recycling over another was not subjected to rulemaking proceedings, public notice or hearings, or evaluation of alternatives or economic impacts.<sup>44</sup>

Moreover, in an effort to encourage reclamation, FDEP's attempt to relieve generators of used antifreeze destined for reclamation from their mandatory duty to make a waste determination under §262.11 violates federal and state RCRA regulations. Under such regulations, used or spent antifreeze is a solid waste because it is a "discarded material." A "discarded material" includes any material which is recycled. Section 261.2(c) provides:

Materials are solid wastes if they are recycled or accumulated, stored, or treated before

<sup>§ 120.54(1)(</sup>a): Rulemaking is not a matter of agency discretion. Each agency statement defined as a rule by § 120.52 shall be adopted by the rulemaking procedure provided by this section as soon as feasible and practicable.

<sup>40</sup> C.F.R. § 261.2.

<sup>46 40</sup> C.F.R. § 261.2(2)(ii).

recycling as specified in (c)(1) - (4) of this section.

Section 261.2(c)(3), in turn, states that spent materials which are reclaimed are solid wastes. $^{47}$ 

FDEP thus announced its policy choice by publishing "guidelines" or "fact sheets", ignoring the clear legislative mandate of Section 120.54(1)(a), Florida Statutes (1997).The policy reclamation over other forms of recycling - by relieving generators of used antifreeze destined for reclamation of their duty to make a RCRA waste determination. 48 The Department then began publishing a "Vendor List of Antifreeze Recyclers", restricting it to companies or mobile vehicles which purport to reclaim used antifreeze. (Attachment 46.) Notably absent are any enforceable standards or review procedures which would enable the Department and other affected persons to determine whether these so-called reclamation activities truly produce a product suitable for re-marketing or reuse as antifreeze.

## VI. CORRECTIVE ACTION

The illicit, unpromulgated "fact sheets" and "guidelines", and their implementation by FDEP constitute an invalid exercise of delegated legislative authority. The Department should withdraw them immediately and refrain from selectively applying RCRA requirements to favor one form of recycling over another.

 $<sup>^{47}</sup>$  40 C.F.R. § 261.2(e) identifies three kinds of materials which are not solid wastes when they are recycled, but spent antifreeze is not one of them.

At the same time, FDEP issued a companion policy which <u>increased</u> RCRA burdens on generators of used antifreeze destined for recycling by energy recovery. In a "clarification" letter dated November 2, 1995, to Richard R. Morris of Safety Kleen, presumably a reclaimer, FDEP announced that such generators could make the required waste determination <u>only</u> by costly TCLP testing. This policy interpretation also violated Section 120.54(1)(a).

#### VII. CONCLUSION

In addition, by this letter, International Petroleum Corporation respectively requests that its re-refinery at 105 South Alexander Street, Plant City, Florida (813) 229-1739 (Fla. Watts 1-800-282-9585) be immediately added to the Vendor List of Used Antifreeze Recyclers.

The alleged RCRA violations relating to the eleven truckloads of soil, sand, and sludge are unsubstantiated, as are most of those relating to the pick-up and processing of used antifreeze. International Petroleum is, however, agreeable to paying \$1530.00 in settlement of any and all of the alleged violations so long as such payment does not admit liability or that such violations occurred.

Used antifreeze falls squarely within the Department's broad definition of "used oil" and International Petroleum is a legitimate recycler of both. The Department has announced and systematically employed a policy of favoring a single form of recycling — reclamation — over other equally legitimate forms. It has done so without adopting the policy as a rule in violation of Section 120.54(1)(a), Florida Statutes (1997).

In its haste to provide incentives to reclamation, the Department improperly and selectively relieved some generators of their duty to make waste determinations required by § 262.11 while increasing RCRA testing requirements for other generators. Such agency action has adversely affected the substantial interests of International Petroleum.

The illicit "guidelines" and "fact sheets" which announce and implement the unauthorized policies should be immediately withdrawn and the policies rescinded until adopted through rulemaking. Finally, International Petroleum Corporation should be immediately added to FDEP's Vendor List of Used Antifreeze Recyclers.

Thank you for consideration and attention to our concerns.

Sincerely,

R. L. Caleen, Jr.

xc: Dr. Richard D. Garrity, Director, FDEP Southwest District Garry Allen, President, IPC

1039:RLC:kj



#### FINAL REPORT WASTE CHARACTERIZATION PROGRAM

for

International Petroleum Corporation 105 South Alexander Street Plant City, Florida 33599 Project 9277

#### Prepared For:

International Petroleum Corporation 105 South Alexander Street Plant City, Florida 33599

Prepared By:

Mary My Edward E. Clark Engineers-Scientists, Inc. 7270 NW 12th Street, Suite 740 Miami, Florida 33126

(305) 233-1411

January 5, 1994

# CLARK

#### 1.0 INTRODUCTION

On June 28, 1993 International Petroleum Corporation (IPC) voluntarily initiated a five month program of extensive laboratory analyses of its waste material. The purpose of this sampling program was to develop a more extensive data base on "sludge" consisting of sump waste and pump filter basket lint. This effort involved sampling of the monthly accumulation of sludge and TCLP analysis. The Florida Department of Environmental Protection (FDEP) had the opportunity to split samples and split samples were collected during one of the five sampling events.

International Petroleum Corporation (IPC) located at 105 South Alexander Street, Plant City, Hillsborough County, Florida and operates a used oil re-refinery. Process waste from the sumps and in-line pump filter baskets are collected into 55-gallon DOT shipping drums throughout the month. At the end of each month, this combined non-hazardous waste is manifested and transported to Clark Environmental, Inc., located at 755 Prairie Industrial Parkway, Mulberry, Florida for solidification prior to disposal at a permitted disposal facility.

This report summarizes the sampling procedures used to collect the sludge samples and includes a discussion of the analytical results that have been obtained during the testing program.

IPC
Final Report
Project 9277
January 5, 1994

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#### 2.0 SLUDGE SAMPLING PROCEDURE

Representative samples of the combined sump and filter basket lint sludge were collected from each drum accumulated during a specific monthly period. Samples were collected from each individual drum and placed in a pre-cleaned stainless steel mixing bowl. After sampling each drum, the composite sludge sample was thoroughly mixed and then transferred to pre-cleaned sample jars supplied by Spectrum Laboratories, Inc.(SPECTRUM) of Ft. Lauderdale, Florida. Samples were stored in a shipping container with wet ice and transported to the laboratory for analysis.

SPECTRUM analyzed the TCLP leachate from the combined sample for volatile and extractable TCLP compounds by gas chromatography/mass spectrometry (GC/MS) by EPA Methods 624/625. TCLP metals were analyzed by either graphite furnace and cold vapor atomic absorption spectrophotometry, as appropriate. All analytical procedures were performed in accordance with SPECTRUM's FDEP approved Comprehensive Quality Assurance Plan (ComQAP) # 870206G.

Samples of the accumulated sludge were collected by representatives of CLARK on the following dates:

- June 28, 1993
- July 27, 1993
- August 30, 1993 \*
- September 28, 1993
- October 28, 1993 \*\*
- \* sample split with Tampa FDEP
- \*\* sample was collected by Spectrum Laboratories, Inc.

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#### 3.0 DISCUSSION OF RESULTS

The combined sump and filter basket composite samples collected on August 30, 1993 were split with Mr. Tim Rice, Hazardous Waste Section, FDEP, Tampa. Mr. Rice collected samples for TCLP volatile compounds and TCLP metals only.

A review of the analytical data, for the five combined sludge samples, shows that the sludge is classified as non-hazardous, as defined by the TCLP criteria. The amounts of benzene, tetrachloroethylene, other organics and metals present in each of the samples were well below maximum concentration for Toxicity Characteristic. The results of the five monthly sampling episodes are summarized in Table 1. Copies of the analytical results for the five sampling events and the split sample analyzed by FDEP are enclosed in Appendix A.

The results of the split sample by the two laboratories are very comparable and well within acceptable limits of one another. comparison of the TCLP volatile data shows good agreement between the concentrations reported by both SPECTRUM and FDEP for benzene and tetrachloroethene, as shown in Table 1. A comparison of the metals concentrations, also shown in Table 1, shows differences in the concentrations reported for lead and barium. These differences may be attributed to the different methodologies employed by the two laboratories. SPECTRUM utilized graphite furnace AA for metal analysis, while FDEP utilized inductively coupled argon plasma (ICP). These methods have different detection limits - ICP limits are usually higher than graphite furnace. However, these slight differences have no significance as to the issue of waste characterization. The FDEP results where consistant

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with previously obtained results; the combined sump waste and pump filter basket lint is classified as non-hazardous, as defined by the TCLP criteria.

CLARK

TABLES

Table 1: Summary of Sludge TCLP Analysis
June 1993 to September 1993

	· · · · · · · · · · · · · · · · · · ·	dile 1333 te	September	1990					
		Concentration (mg/l)							
	Sampled	Sampled	Sampled	FDEP	Sampled	Sampled	TCLP *		
Compound	06/28/93	07/27/93	08/30/93	Split	09/27/93	10/28/93	Criteria		
Arsenic	0.003	0.009	0.004	BDL	BDL	0.003	5.0		
Barium	0.72	3.77	BDL	0.5	1.02	0.31	100		
Cadmium	0.002	BDL	BDL	BDL	0.04	0.02	1.0		
Chromium	0.003	0.30	BDL	BDL	0.04	0.04	5.0		
Lead	0.071	0.14	- 0.09	BDL	0.14	0.15	5.0		
Mercury	BDL	BDL	BDL	BDL	BDL	0.0002	0.2		
Selenium	BDL	BDL	BDL	BDL	BDL	BDL	1.0		
Silver	BDL	BDL	BDL	BDL	BDL	BDL	5.0		
Benzene	0.005	0.003	0.007	0.010	BDL :	0.0011	0.5		
Carbon Tetrachloride	BDL	BDL	BDL	BDL	BDL	BDL	0.5		
Chlorobenzene	BDL	BDL	BDL	BDL	BDL	BDL	100		
Chloroform	BDL	BDL	BDL	BDL	BDL	0.008	6.0		
1,2-Dichloroethane	BDL	BDL	BDL	BDL	BDL	BDL	0.5		
1,1-Dichloroethylene	BDL	BDL	BDL	BDL	BDL.	BDL	0.7		
Hexachloroethane	BDL	BDL	BDL	NR	BDL	BDL	3.0		
Methyl Ethyl Ketone	BDL	BDL	BDL .	NR	BDL	0.034	200		
Tetrachloroethylene	0.002	0.002	0.005	0.007	0.003	BDL	0.7		
Trichloroethylene	BDL	BDL	BDL	BDL	BDL	BDL	0.5		
Vinyl Chloride	BDL	BDL	BDL	BDL	BDL	BDL	0.2		
o-Cresol	0.041	0.016	BDL	NR	BDL	0.001	200		
m Cresol	BDL	BDL	BDL	NR	BDL	BDL	200		
p-Cresol	0.018	0.004	BDL	NR	BDL	0.006	200		
1,4-Dichlorobenzene	BDL	BDL	BDL	BDL	BDL	BDL	7.5		
2,4-Dinitrotoluene	BDL	BDL	BDL	NR	BDL	BDL	0.13		
Hexachlorobenzene	BDL	BDL	BDL	- NR	BDL	BDL	0.13		
Hexachlorbutadiene	BDL	BDL	BDL	NR	BDL	BDL	0.5		
Nitrobenzene	BDL	BDL	BDL	NR	BDL	BDL	2.0		
Pentachlorophenol	BDL	BDL	BDL	NR	BDL	0.042	100		
Pyridine	BDL	BDL	BDL	NR	BDL	BDL	5.0		
2,4,5-Trichlorophenol	BDL	BDL	BDL	NR	BDL	BDL	400		
2,4,6-Trichlorophenol	BDL	BDL	BDL	NR NR	BDL	BDL	2.0		

(BDL) Below Laboratory Detection Limits (NR) Not Reported by FDEP (\*) Maximum concentration for non-hazardous

**ELMR** 

APPENDIX A



# Florida Department of Environmental Protection

Southwest District 3804 Coconut Palm Drive Tampa, Florida 33619 813-744-6100

Virginia B. Wetherell Secretary

FAX TRANSMITTAL SHEET

12/15/93 Date

TO:	KEN BAUGHMAN	
FROM:	DEPT.: CLARK  FAX #: (305) 59/-1549  TIMYN RICE  DEPT.: D.E.P., Tampa Office  PHONE: 813-744-6100 or SunCom 542-6100 Ext.  FAX (local) 744-6125 or (SunCom) 542-6125	, y
SUBJECT:	INTERNATIONAL PETROLEUM	
COMMENT:	п.	
TOTAL NUM	BER OF PAGES, INCLUDING COVER PAGE:	
RECEIVED	BY:PHONE:	

18-OCT-1993

Page" 1 of 2

FLORIDA DEPARTMENT OF ENVIRONMENTAL PROTECTION CENTRAL LABORATORY 2600 BLAIR STONE ROAD TALLAHASSEE, FLORIDA 32399-2400

### CHEMICAL ANALYSIS REPORT

Request ID: RQ-93-AUG-30-25

Job ID: 93-SEP-01-10 Project: OTHER

Job Name: INTERNATIONAL PETROLEUM - Job created on 1-SEP Date Received: 1-SEP-1993 Customer ID: SW-TAM-WSM

Authorized: 30-SEP-1993 By: Liang T. Lin.

Submitted By: SW DIST. OFFICE (TAMPA) - WASTE MANAGEMEN

3804 Coconut Palm Drive Tampa, Florida 33619

Attn: Kent Edwards

For Additional Information, Please Contact G. William Coppenger, Ph.D. Yuh-Hsu Pan, Ph.D. Timothy W. Fitzpatrick Liang-Tsair Lin, Ph.D. Suncom 277-2571 (904) 487-2571

Preliminary Review Copy

Date: 18-OCT-1993

#### Abbreviations & Storet Codes:

A - Value reported is the mean of two or more determinations

B - Results based on colony counts outside the acceptable range.

I - Value reported is less than the minimum quantitation limit, and greater than or equal to the minimum detection limit.

J - Estimated value

K - Actual value is known to be less than value given

\* L - Actual value is known to be greater than value given

N - Presumptive evidence of presence of material. 0 - Sampled, but analysis lost or not performed.

Q - Sample held beyond normal holding time.

T - Value reported is less than the criterion of detection.

U - Material was analyzed for but not detected; The value reported is the minimum detection limit.

- V Analyte was \_\_tected in both sample and \_\_ethod blank.
  Z Colonies were too numerous to count (TNTC).

#### 18-OCT-1993

Page 2 of 2

Sample ID: 61364/93-SEP-01-10-01 Matrix: S-OTHER

Location: INTERNATIONAL PETROLEUM

Field ID: FILTER BASKET

Collected: 30-AUG-1993 08:45 By: TANYA RICE Authorized: 29-SEP-1993 By: Mei-Fang Shyu

Type: Grab Sample

Lab Comments:

DEP TEMP=1DC

Field Comments:

MATRIX=SLUDGE

Analysis ID: TCLP-VOC

Volatiles in TCLP ZHE extract by 5030-8260

Prepared: 9-SEP-1993 00:00 By: Kevin Everett Analyzed: 14-SEP-1993 00:00 By: Jusheng Qi Authorized: 24-SEP-1993 By: Jusheng Qi

			ra
Storet#	Analyte	Value	Units "
	Benzene	9.6	ug/1
	Bromoform	2.5 U	ug/l
	Carbon tetrachloride	2.5 U	ug/l
	Chlorobenzene	2.5 U	ug/l
	Chloroform	2.5 U	ug/l
	1,2-Dichlorobenzene	5.0	ug/l
	1,3-Dichlorobenzene	2.5 U	ug/l
	1,4-Dichlorobenzene	2.5 U	ug/l
	Dibromochloromethane	2.5 U	'ug/1 "
	1,1-Dichloroethane	2.5 U	ug/l
	1,2-Dichloroethane	2.5 U	ug/1
	1,1-Dichloroethene	2.5 U	
	1,2-Dichloropropane	2.5 U	ug/l
	Ethylbenzene	35	- ug/l
	Methylene chloride		ug/l
	1,1,2,2-Tetrachloroethane	11	ug/l
	Tetrachloroethene	2.5 U	ug/l
		7.0	ug/l
	1,1,1-Trichloroethane	7.6	ug/l
	1,1,2-Trichloroethane	2.5 U	ug/l
	Trichloroethene	2.5 U	ug/l
	Toluene	89	", ug/l "
	Vinyl chloride	2.5 U	ug/l
Commonte	Xylenes	240	ug/l
Commence	s(1): Elevated detection limits	due to sample	matrix interfe

limits due to sample matrix interference.

(2): Tentative identification: total purgeable petroleum

hydrocaons=est. 920 ug/L.

JASTÉ MGT TAMPA SWDIST TEL:813-744-8423 ... Dec 15 93 ...14:15 No.010 P.05

Dec 15 93 \_14:15 No.010 P.05 ქამი ალუ

Date: 20-SEP-1993

20-SEP-1993

Page 1 of 4

FLORIDA DEPARTMENT OF ENVIRONMENTAL PROTECTION
CENTRAL LABORATORY
2600 BLAIR STONE ROAD
TALLAHASSEE, FLORIDA 32399-2400

#### CHEMICAL ANALYSIS REPORT

Request ID: RQ-93-AUG-30-25

Job ID: 93-SEP-01-06 Project: OTHER

Job Name: INTERNATIONAL PETROLEUM - Job created on 1-SEP Date Received: 1-SEP-1993 Customer ID: SW-TAM-WSM

Authorized: 15-SEP-1993 By: Liang T. Lin

Submitted By: SW DIST. OFFICE (TAMPA) - WASTE MANAGEMEN

3804 Coconut Palm Drive Tampa, Florida 33619

Attn: Kent Edwards

For Additional Information, Please Contact
G. William Coppenger, Ph.D.
Yuh-Hsu Pan, Ph.D.
Timothy W. Fitzpatrick
Liang-Tsair Lin, Ph.D.
Suncom 277-2571
(904) 487-2571

Preliminary Review Copy

#### Abbreviations & Storet Codes:

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- I Value reported is less than the practical quantitation limit, and greater than or equal to the minimum detection limit.
- J Estimated value
- K Actual value is known to be less than value given
- † L Actual value is known to be greater than value given
- N Presumptive evidence of presence of material.
  - 0 Sampled, but analysis lost or not performed.
  - Q Sample held beyond normal holding time.
  - T Value reported is less than the criterion of detection.
  - U Material was analyzed for but not detected; "
    The value reported is the minimum detection limit.

V - Analyte was detected in both sample and method blank.
 Z - Colonies were too numerous to count (TNTC).

#### 20-SEP-1993

Page 2 of

Sample ID: 61357/93-SEP-01-06-01 Matrix: W-FIELD-BK

Location: INTERNATIONAL PETROLEUM

Field ID: FIELD BLANK

Collected: 30-AUG-1993 08:30 By: TANYA RICE Authorized: 13-SEP-1993 By: Mei-Fang Shyu

Type: Grab Sample Lab Comments:

DEP TEMP=1DC

Field Comments:

Analysis ID: W-VOC-MS-A

Volatiles in wtr or waste wtr by 624/5030-8240

Prepared: NA By:

Analyzed: 4-SEP-1993 00:00 By: Jusheng Qi Authorized: 7-SEP-1993 By: Jusheng Qi

Storet#	Analyte	Value	Units
34030	Benzene	0.50 U	ug/L
32101	Bromodichloromethane	0.50 U	ug/L
32104	Bromoform	0.50 U	ug/L
34413	Bromomethane	0	ug/L
32102	Carbon tetrachloride	0.50 U ~	" ug/L
34301	Chlorobenzene	0.50 U	ug/L
34311	Chloroethane	0.50 U	ug/L
34576	2-Chloroethylvinyl ether	0.50 U	ug/L
32106	Chloroform	0.50 U	ug/L
34418	Chloromethane	0.50 U	ug/L
34536	1,2-Dichlorobenzene	0.50 U	ug/L
34566	1,3-Dichlorobenzene	0.50 U	ug/L
34571	1,4-Dichlorobenzene	0.50 U	ug/L ~
32105	Dibromochloromethane	0.50 U	ug/L
34496	1,1-Dichloroethane	0.50 U	ug/L
34531	1,2-Dichloroethane	0.50 U	ug/L
34501	1,1-Dichloroethene	0.50 U	ug/L
34546	trans-1,2-Dichloroethene	0.50 U	ug/L
34541	1,2-Dichloropropane	0.50 บ	ug/L
34561	cis-1,3-Dichloropropene	0.50 U	ug/L
34561	trans-1,3-Dichloropropene	0.50 U	ug/L
34371	Ethylbenzene	0.50 U	ug/L
34423	Methylene chloride	0.50 U	ug/L
34516	1,1,2,2-Tetrachloroethane	0.50 U	ug/L
34475	Tetrachloroethene	0.50 U	ug/L
34506	1,1,1-Trichloroethane	0.50 บ	ug/L
3,4511	1,1,2-Trichloroethane	0.50 U	ug/L
39180	Trichloroethene	0.50 บ	ug/L
34910	Toluene	0.50 U	ug/L
39175	Vinyl chloride	0.50 U	$\mathtt{ug}/\mathtt{L}$
81551	Xylenes	0.50 U	ug/L
	Trichlorofluoromethane	0.50 U	ug/L
Comment	s(1): O due to analytical probl	em only associate	d

61357/93-SEP-01-06-01/W-VOC-MS-A

Continued on Page 3

20-SEP-1993

Page 3 of

61357/93-SEP-01-06-01/W-VOC-MS-A Continued from Page

Storet# Analyte

Value

Units

ug/L ug/L .

ug/L

ug/L

ug/L

ug/L

ug/L

ug/L

(2): with Bromomethane.

Sample ID: 61358/93-SEP-01-06-02 Matrix: W-TRIP-BLK

Location: DEP LABORATORY

Field ID: TRIP BLANK

Collected: 25-AUG-1993 07:40
Authorized: 13-SEP-1993

Type: Grab Sample

By: Mei-Fang Shyu

0.50 U

0.50 U

0.50 U

0.50 U

0.50 U

0.50 U

Type: Grab Sample

Lab Comments:

EP TEMP=1DC

Field Comments:

Analysis ID: W-VOC-MS-A

Volatiles in wtr or waste wtr by 624/5030-8240

Prepared: NA

By: Analyzed: 4-SEP-1993 00:00 By: Jusheng Qi

34475 Tetrachloroethene

1,1,1-Trichloroethane

34506

Authorized: 7-SEP-1993 By: Jusheng Qi

Storet# Analyte Value Units 34030 34030 Benzene
32101 Bromodichloromethane
32104 Bromoform
34413 Bromomethane
32102 Carbon tetrachloride
34301 Chlorobenzene
34311 Chloroethane
34576 2-Chloroethylvinyl ether
32106 Chloroform
34418 Chloromethane Benzene 0.50 U ug/L 0.50 U ug/L 0.50 U ug/L uq/L 0.50 U ug/L 34418 Chloromethane 0.50 U ug/L 34536 1,2-Dichlorobenzene 0.50 U ug/L 34566 0.50 U 0.50 U 0.50 U 1,3-Dichlorobenzene ug/L 34571 1,4-Dichlorobenzene ug/L 32105 Dibromochloromethane 34496 ug/L 1,1-Dichloroethane 0.50 U ug/L 34531 1,2-Dichloroethane
1,1-Dichloroethene 0.50 U ug/L 0.50 U 0.50 U 0.50 U 34501 ug/L 34546 trans-1,2-Dichloroethene 34540 1,2-Dichloropernene
34541 1,2-Dichloropropane
34561 cis-1,3-Dichloropropene
34561 trans-1,3-Dichloropropene
34371 Ethylbenzene
34423 Methylene chloride
34516 1,1,2,2-Tetrachloroethane ug/L

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Dec 15 93 14:19 No.010 P.10

61358/93-SEP-01-06-02/W-VOC-MS-A

Continued on Page 4

Analyte

Toluene

Xylenes

20	-5	EP-	 J	7	_3

Storet#

34511

39180

34910

39175

81551

Page 4 of 4

ug/L

ug/L

61358/93-SEP-01-06-02/	/W-VOC-MS-A
------------------------	-------------

1,1,2-Trichloroethane

Trichloroethene

Vinyl chloride

Continued from Page

Units
** ** ** ** ** ** ** **
ug/L
ug/L
ug/L
ug/L

0.50 U

Trichlorofluoromethane 0.50 U
Comments(1): O due to analytical problem only associated

(2): with Bromomethane.

\*\*\*\*\*\* END OF REPORT \*\*\*\*\*\*

µASTE`MGT TAMPA SWDIST TEL:813-744-8423 |

Dec 15 93 14:20 No.010 P.12 141665

29-SEP-1993

Page 1 of 3

FLORIDA DEPARTMENT OF ENVIRONMENTAL PROTECTION CENTRAL LABORATORY 2600 BLAIR STONE ROAD TALLAHASSEE, FLORIDA 32399-2400

#### CHEMICAL ANALYSIS REPORT

Request ID: RQ-93-AUG-30-25

Job ID: 93-SEP-01-09 Project: OTHER

Job Name: INTERNATIONAL PETROLEUM - Job created on 1-SEP Date Received: 1-SEP-1993 Customer ID: SW-TAM-WSM

Authorized: 21-SEP-1993 By: Tim Fitzpatrick

Submitted By: SW DIST. OFFICE (TAMPA) - WASTE MANAGEMEN

> 3804 Coconut Palm Drive Tampa, Florida 33619

Attn: Kent Edwards

For Additional Information, Please Contact G. William Coppenger, Ph.D. Yuh-Hsu Pan, Ph.D. Timothy W. Fitzpatrick Liang-Tsair Lin, Ph.D. Suncom 277-2571 (904) 487-2571

Preliminary Review Copy

Date: 29-SEP-1993

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- N Presumptive evidence of presence of material.
  - 0 Sampled, but analysis lost or not performed.
  - Q Sample held beyond normal holding time.
  - T Value reported is less than the criterion of detection.
  - U Material was analyzed for but not detected; The value reported is the minimum detection limit.

WASTE MGT TAMPA SWDIST TEL:813-744-3423

Dec 15 93 14:21 No.010 P.13

V - Analyte was detected in both sample and method blank.
Z - Colonies were too numerous to count (TNTC).

#### 29-SEP-1993

Page 2 of 3

Sample ID: 61363/93-SEP-01-09-01 Matrix: S-OTHER

Location: INTERNATIONAL PETROLEUM

Field ID: FILTER BASKET

Collected: 30-AUG-1993 08:45 By: TANYA RICE

Authorized: 21-SEP-1993 By: Tim Fitzpatrick

Type: Grab Sample

Lab Comments:

DEP TEMP=1DC

Field Comments:

MATRIX=SLUDGE

Analysis ID: HG-H-TCLP

Mercury in TCLP extracts by Method 7470, modified Prepared: 7-SEP-1993 00:00 By: Jason Hatcher Analyzed: 7-SEP-1993 15:00 By: Jason Hatcher Authorized: 21-SEP-1993 By: Tim Fitzpatrick

Storet#	Analyte	Value	Units
	Mercury	0.0001 U	mg/L

Analysis ID: TCLP-ICP

ICP multielement analysis of TCLP extracts, Method 6010

Prepared: 3-SEP-1993 17:59 By: Jason Hatcher Analyzed: 8-SEP-1993 14:56 By: Jin-Chaun Liu Authorized: 21-SEP-1993 By: Tim Fitzpatrick

Storet#	Analyte		Value	Units
	Antimony		0	·mg/L ·
	Aluminum		0	mg/L
	Arsenic		0.2 U	mg/L
	Barium		0.5 A	mg/L
	Cadmium	<b>**</b> ••••	0.03 U	" mg/L
	Chromium		0.1 U	mg/L
	Beryllium		0	mg/L
	Cobalt		0	mg/L
	Copper		0	mg/L
	Calcium	• •	• 0	mg/L
	Lead	•	0.15 U	mg/L
	Manganese		0	mg/L
	Nickel		0	mg/L
<u> </u>	Selenium	·	0.3 U	mg/L ~
	Iron	•	0	mg/L
	Silver		0.03 U	mg/L
	Zinc		<b>O</b> .	mg/L
•	Magnesium		0	mg/L
	Potassium		0	mg/L
•	Sodium		O	mg/L

WASTE-MGT TAMPA SWDIST TEL:813-744-8423

Dec 15 93 14:22 No.010 P.15

61363/93-SEP-01-09-01/TCLP-ICP ---

Continued on Page 3

29-SEP-1993

Page 3 of 3

61363/93-SEP-01-09-01/TCLP-ICP Continued from Page 2

Storet#	Analyte	Value	Units
	Strontium Thallium	0	mg/L mg/L
Comment	Vanadium	O MS Electronically	mg/L

\*\*\*\*\*\* END OF REPORT \*\*\*\*\*\*\*

### **CHAIN OF CUSTODY RECORD**



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1460 W. McNab Road Ft. Lauderdale, FL 33309 (305) 978-6400 630 Indian Street Savannah, GA 31401 (912) 238-5050

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## TOXICITY CHARTERISTIC LEACHING PROCEDURE

INTERNATIONAL PETROLEUM

ADDITIONAL DATA:

\_ --- \_ ---

1.

SAMPLE NUMBER: 036-102893
LOCATION: 001-WS
DDITIONAL DATA: IPC PLANT CITY
SAMPLED BY: JIM OLIVER, SPECTRUM
SUBMITTED BY: GREYHOUND
DATE SAMPLED: 10/28/93 1420
DATE REPORTED: NOV. 15 1993
REVISION: 0

DRINKING WATER: #86144 ENVIRONMENTAL: #E86006 GEORGIA: #828,829 SOUTH CAROLINA: #96015 EPA: #FL095 FDER COAP: #870206G DATE RECEIVED: 10/29/93 SAMPLE MATRIX: SOIL FL DRINKING WATER: FL ENVIRONMENTAL:

ANALYTE	. METHOD	RESULT (- = <)	UNITS	REGULATORY CONC.		
				<del></del>	<u> </u>	
ARSENIC TCLP BARIUM TCLP	1311/7060 1311/7080	0.003 0.31	mg/l	5.0	mg/1	
CADMIUM TCLP	1311/7131	0.02	mg/l mg/l	100.0	mg/l	
CHROMIUM TCLP	1311/7191	0.04	mg/1	5.0	mg/l mg/l	
LEAD TCLP	1311/7421	0.15	mg/l	5.0	mg/1	
MERCURY TCLP	1311/7471	0.0002	mg/l	0.2	mg/1	
SELENIUM TCLP	1311/7740	-0.002	mg/l	1.0	mg/1	
SILVER TCLP	1311/7760	-0.01	mg/l	5.0	mg/l	
CHLORDANE TCLP	1311/608	-1	ug/l	30	ug/l	
2,4-D TCLP ENDRIN TCLP	1311/615	1.4	ug/l	10000	ug/l	
HEPTACHLOR TCLP	1311/608	-1	ug/l	20	ug/l	
LINDANE TCLP	1311/608 1311/608	-1 -1	ug/l	8	ug/l	
METHOXYCHLOR TCLP	1311/608	-1 -1	ug/l ug/l	400 10000	ug/l	
TOXAPHENE TCLP	1311/608	-10	ug/l	500	ug/l ug/l	
SILVEX TCLP	1311/615	-1	ug/l	1000	ug/1	
BENZENE TCLP	1311/624	1.13	ug/l	500	ug/l	
CARBN TETRACHLORIDE TCLP	1311/624	-1	ug/l	500	ug/l	
CHLOROBENZENE TCLP	1311/624	-1	ug/l	100000	ug/l	
CHLOROFORM TCLP	1311/624	8.17	ug/l	6000.,	ug/l	
1,2-DICHLOROETHANE TCLP 1,1-DICHLORETHYLENE TCLP	1311/624	-1	ug/l	500	ug/l	
HEXACHLOROETHANE TCLP	1311/624	-1	ug/l	700	ug/l	
METHYL ETHYL KETONE TCLP	1311/624 1311/624	-1 34.2	ug/1	3000 200000	ug/l	
TETRACHLOROETHYLENE TCLP	1311/624	-1	ug/l ug/l	700	ug/1	
TRICHLOROETHYLENE TCLP	1311/624	-1	ug/l	500	ug/l ug/l	
VINYL CHLORIDE TCLP	1311/624	-ī	ug/l	200	ug/l	
O-CRESOL TCLP	1311/625	1.2	ug/l	200000	ug/l	
M-CRESOL TCLP	1311/625	-1	ug/l	200000	ug/l	
P-CRESOL TCLP	1311/625	6.4	ug/l	200000	ug/l	
1,4-DICHLOROBENZENE TCLP	1311/625	-1	ug/1	7500	ug/l	
2,4-DINITROTOLUENE TCLP HEXACHLOROBENZENE TCLP	1311/625	<del>-</del> 5	ug/l	130	ug/l	
HEXACHLOROBUTADIENE TCLP	1311/625 1311/625	-1 -1	ug/l	130	ug/1	
NITROBENZENE TCLP	1311/625	-1 -1	ug/l	500	ug/l	
PENTACHLOROPHENOL TCLP	1311/625	42.1	ug/l ug/l	2000 100000	ug/l ug/l	
PYRIDINE TCLP	1311/625	-5	ug/1	5000	ug/l	
245-TRICHLOROPHENOL TCLP	1311/625	-1	ug/l	400000	ug/l	
246-TRICHLOROPHENOL TCLP	1311/625	-1	ug/l	2000	ug/l	

IF YOU HAVE ANY QUESTIONS PLEASE CONTACT ME.

LYLE A. JOHNSON LAB MANAGER

### CHAIN OF CUSTOUT RECORD



Laboratories, Inc

FORT LAUDERDALE • SAVANNAH

1460 W. McNab Road
Ft. Lauderdale, FL 33309
(305) 978-6400

☐ 630 Indian Street Savannah, GA 31401 (912) 238-5050

Laboratories, in		ENOBEITE		•			,	(500) 07	3 0 4 0 0		(0.12) 200 00	.00
Project Name	or Number		Client N	ame	÷ ;	Lab	oratory /	Analysis				
Project Location	on			ame ank Engine	1873			My		/		: ·
LCN	Sample Number	Date	Time	Sample Matrix	Container (s)			tid. or held			Comme	ents
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## TOXICITY CHARTERISTIC LEACHING PROCEDURE

CLIENT: SAMPLE NUMBER: LOCATION:

ENGINEERS & SCIENTIST 142-093093 9277.02/LINT BASKET WASTE PLANT CITY PAT FOX, CLARK RALPH TARDIF, SPECTRUM 09/28/93 OCT. 15 1993

ADDITIONAL DATA:
SAMPLED BY:
SUBMITTED BY:
DATE SAMPLED:
DATE REPORTED:
REVISION:

FL\_DRINKING WATER: FL ENVIRONMENTAL:
GEORGIA:

#86144 #E86006 #828,15 #96015 #FL095 #870206G 09/30/93 SOIL SOUTH CAROLINA:
EPA:
FDER CQAP:
DATE RECEIVED:
SAMPLE MATRIX:

ANALYTE	METHOD	RESULT (- = <)	UNITS	REGUL CO.	ATORY NC.
ARSENIC TCLP BARIUM TCLP CADMIUM TCLP CHROMIUM TCLP LEAD TCLP MERCURY TCLP SELENIUM TCLP SILVER TCLP CHLORDANE TCLP 2,4-D TCLP ENDRIN TCLP HEPTACHLOR TCLP LINDANE TCLP METHOXYCHLOR TCLP TOXAPHENE TCLP SILVEX TCLP BENZENE TCLP	1311/7060 1311/7080 1311/7131 1311/7491 1311/7471 1311/7740 1311/7760 1311/608 1311/608 1311/608 1311/608 1311/608 1311/608 1311/608 1311/608 1311/608 1311/608 1311/608	-0.002 1.02 0.04 0.04 0.14 -0.0002 -0.002	mg/l mg/l mg/l mg/l mg/l mg/l	5.0 100.0 1.0 5.0 5.0 0.2 1.0 30 10000 20 8 400 10000 10000	mg/l mg/l mg/l mg/l mg/l ug/l ug/l ug/l ug/l
CARBN TETRACHLORIDE TCLP CHLOROBENZENE TCLP CHLOROFORM TCLP 1,2-DICHLOROETHANE TCLP 1,1-DICHLORETHYLENE TCLP HEXACHLOROETHANE TCLP METHYL ETHYL KETONE TCLP TETRACHLOROETHYLENE TCLP TRICHLOROETHYLENE TCLP VINYL CHLORIDE TCLP O-CRESOL TCLP M-CRESOL TCLP 1,4-DICHLOROBENZENE TCLP 2,4-DINITROTOLUENE TCLP HEXACHLOROBENZENE TCLP HEXACHLOROBENZENE TCLP NITROBENZENE TCLP PENTACHLOROPHENOL TCLP PYRIDINE TCLP 245-TRICHLOROPHENOL TCLP 246-TRICHLOROPHENOL TCLP	1311/624 1311/624 1311/624 1311/624 1311/624 1311/624 1311/624 1311/624 1311/625 1311/625 1311/625 1311/625 1311/625 1311/625 1311/625 1311/625 1311/625 1311/625 1311/625 1311/625 1311/625 1311/625	-1 -1 -1 -1 -1 -1 -5 2.93 -1 -1 -1 -1 -1 -1 -1 -1 -1 -1 -1 -1	ug/l ug/l ug/l ug/l ug/l ug/l ug/l ug/l	500 500 100000 6000 500 700 3000 200000 200000 200000 200000 130 130 130 500 2000 100000 400000 2000	ug/ll uuug/ll uuugg//ll uuugg//ll uuugg///ll uuugg///ll uuugg///ll uuug//ll uuuug//ll

IB YOU HAVE ANY QUESTIONS PLEASE CONTACT ME.

1.

LYLE A. JOHNSON LAB MANAGER

# EDWARD E. CLARK ENGINEERS-SCIENTISTS, INC. ENGINEERS-SCIENTISTS LABORATORY, INC.

#### GROUNDWATER MONITORING WELL DATA

PROJECT No: 9277.02	DATE: 9-28-93	TIME:	
;	:	)/./	
SITE LOCATION: Z. P.C.	SAMPLERS(s)	: 44 700	`
Plant Cita			
	· ·		

SAMPLE ID:	WEIL DIAMETER (inches)	GROUND LEVEL TO H2O SURFACE IN FEET	SURFACE TO WELL BOTTOM IN FEET	SCREEN DEPIH (ft)	WELL CAPACITY (gallons)	EVACUATION VOLUME (GALLONS)	EVACUATION METHOD	COMMENTS:
LINT BUSKET	4 Drur	15 Composed	d for the	of to	LP,			
- Sample S			Ü	,				
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Laboratories, Inc.

FORT LAUDERDALE - SAVANNAH

1460 W. McNab Road
Ft. Lauderdale, FL 3330
13051 978 6400

630 Indian StreetSavannah, GA 31401(912) 238-5050

Project Name	or Number		Client N	ame. 🕢 🔪		Laboratory Analysis					·						
Project Name	. 927	2	C/L	ame Enginee	MS	Lo	ioorai	ory A	naiys	<u>60</u>	<del></del> .						
Project Location	on FLA.			·	· · · · · · · · · · · · · · · · · · ·					/ /	/ /	/ /	/ /		-		
LCN	Sample Number	Date	Time	Sample Matrix	Container (s)	1/13		, Herby	,//	/		/. /		Co-	mments		
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411DLED DV	~ <i>ll)</i>		Tran: Num	sfer Item ber Number	* Transfers , Belinquished b	y:		Accepte	l =g/by:					Date		Time	]
AMPLED BY:	Hoe		2	·	Afre-	ļ. ·	,	Wa	1	18	u		(8	2-30-93			
	:		3			<del></del>											
Samples that are	determined	to be haza		be returned to subm	ittor												

# CLARK ENGINEERS-SCIENTIST, INC. FIELD QUALITY CONTROL CHECKLIST

No:		GENERAL COMMENTS Splt Sample W/ Termun Rice
DATE:	8-30-93	Horndon Waste Constiance Serlier
SITE LOCATION:	I.P.C. Plant city	DEL.
FIELD SAMPLER(s):	The :	

	DATTED	ΨADE∕S	WATER TEVEL	DUMP/HOSES	DH METTER	DO METTER	CONDUCT	REMARKS/
SAMPLE ID	BATLER RINSED	TAPES CLEANED	WATER LEVEL INDICATOR RINSED	PUMP/HOSES CLEANED	pH METER CALIB.	DD METER CALIB.	CONDUCT METER CALIB.	REMARKS/ OBSERVATIONS
Seum come	NA	N/X	W/H.	X/A	NA	NA	W/A	
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Laboratories, Inc.

FORT LAUDERDALE · SAVANNAH

## TOXICITY CHARTERISTIC LEACHING PROCEDURE

ANATUME

CLIENT: ENGINEERS & SCIENTIST
SAMPLE NUMBER: 022-062993
LOCATION: 9277.02/WS-1
ADDITIONAL DATA: IPC PLANT CITY
SAMPLED BY: JAMAL
SUBMITTED BY: DWIGHT SLUSHER
DATE SAMPLED: 06/28/93 1040
DATE REPORTED: JULY 21 1993
REVISION: 0

REVISION: 0 FL DRINKING WATER:
FL ENVIRONMENTAL:
GEORGIA:
SOUTH CAROLINA:
EPA:
FDER COAP:
DATE RECEIVED:
SAMPLE MATRIX:

#86144 #8660 82 #8280 15 #91095 63 #910920 63 #8728 9611

ANALYTE	METHOD	RESULT (- = <)	UNITS	REGULATORY CONC.		
ARSENIC TCLP	1311/7060	εοαο	mg/l	~ 5.0	ma /	
BARIUM TCLP	1311/7080	0.72	mg/l	100.0	mg/	
CADMIUM TCLP	1311/7131	0.0021	mg/l	1.0	mg/	
CHROMIUM TCLP	1311/7191	0.003	mg/l	5.0	mg/	
LEAD TCLP	1311/7421	0.071	mg/1	5.0	mg/	
MERCURY TCLP	1311/7471	-0.0002	mg/1	0.2	mg/	
SELENIUM TCLP	1311/7740	-0.002	mg/l	1.0	mg/	
SILVER TCLP	1311/7760	-0.01	mg/l		mg/	
CHLORDANE TCLP	1311/608	-1	ug/l	5.0	mg/	
2,4-D TCLP	1311/615	-1		30	ug/	
ENDRIN TCLP	1311/608	-1	ug/l	10000	ug/	
HEPTACHLOR TCLP	1311/608	-1	ug/l	20	ug/	
INDANE TCLP	1311/608	-1	ug/1	0	ug/	
ETHOXYCHLOR TCLP	1311/608	-1	ug/l	400	ug/	
COXAPHENE TCLP	1311/608	-10	ug/1	10000	ug/	
SILVEX TCLP	1311/615	-10	ug/l	500	ug/	
BENZENE TCLP	1311/624	4.62	ug/1	1000	ug/	
CARBN TETRACHLORIDE TCLP	1311/624	-1	ug/l	500	ug/	
CHLOROBENZENE TCLP	1311/624	-1	ug/l	500	ug/	
CHLOROFORM TCLP	1311/624	-1	ug/l	100000	ug/	
,2-DICHLOROETHANE TCLP	1311/624	-i	ug/l	6000	ug/	
1,1-DICHLORETHYLENE TCLP	1311/624	- <b>i</b>	ug/l	500	ug/	
EXACHLOROETHANE TCLP	1311/624	-1	ug/l	700	ug/	
ETHYL ETHYL KETONE TCLP	1311/624	-5	ug/l	3000	ug/	
TETRACHLOROETHYLENE TCLP	1311/624	1.82	ug/l	200000	ug/	
TRICHLOROETHYLENE TCLP	1311/624	-1	ug/l	700	ug/	
INYL CHLORIDE TCLP	1311/624	-1	ug/l	500	ug/	
D-CRESOL TCLP	1311/625	41.1	ug/l	200	ug/	
I-CRESOL TCLP	1311/625		ug/l	200000	ug/	
P-CRESOL TCLP		-1	ug/l	200000	ug/	
,4-DICHLOROBENZENE TCLP	1311/625	17.7	ug/l	200000	ug/	
,4-DINITROTOLUENE TCLP	1311/625	-1 .	ug/l	7500	ug/	
EXACHLOROBENZENE TCLP	1311/625	-5	ug/1	130	ug/	
EXACHLOROBUTADIENE TCLP	1311/625	-1	ug/l	130	ug/	
ITROBENZENE TCLP	1311/625	-1	ug/l	500	ug/	
ENTACHLOROPHENOL TCLP	1311/625	-1	ug/l	2000	ug/	
PYRIDINE TCLP	1311/625	-1	ug/l	100000	ug/	
45-TRICHLOROPHENOL TCLP	1311/625	-10	ug/l	5000	ug/	
246-TRICHLOROPHENOL TCLP	1311/625	-1	ug/l	400000	ug/:	
IF YOU HAVE ANY OURSTIONS DO	1311/625	-1	ug/l	2000	ug/:	

IF YOU HAVE ANY QUESTIONS PLEASE CONTACT ME.

BOHNSON LYLE A. LAB MANAGER

### **CHAIN OF CUSTODY RECORD**



Laboratories, Inc.

FORT LAUDERDALE • SAVANNAH

1460 W. McNab Road Ft. Lauderdale, FL 33309 (305) 978-6400 630 Indian Street Savannah, GA 31401 (912) 238-5050

Project Name	or Number		Client N	ame IEK Gryinee		Labo	ratory Apoly	.1.	-
I.P.C. FAC				ON Cinena	15	Labo	oratory Analys	SIS	·
T.P.C. Fnc Project:Location 104 3 ALEXA	n ,	4		a regular	/				
104 3 ALEXA	nder St, 1	antin							/ / /
LCN	Sample Number	Date	Time	Sample . Matrix	Container (s)	\\dag{\dag{\dag{\dag{\dag{\dag{\dag			Comments
<i>013-072993</i>	Filkr BASSA Cant Compose	57-2793	0810	Drum Composed A&B:	Ce 1	X			_
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			Tran Nun	nsfer Item nber Number	* Transfe Relinguish		Accepted by	:	Date Time
SAMPLED BY:	How		1	<del></del>	pffe		Bal	of Plans	8 7-27-92 1:16
			3			a <sup>c</sup>			

PAGE	OF

# EDWARD E. CLARK ENGINEERS-SCIENTISTS, INC. ENGINEERS-SCIENTISTS LABORATORY, INC.

#### GROUNDWATER MONITORING WELL DATA

PROJECT No:	DAȚE: 7-27-9	3	TIME:	
SITE LOCATION: I, P.C. Plant	i .	SAMPLERS(s):_	floc	
Plant City, PLA:  104 3 ALEXANDER ST	··			

SAMPLE ID:	WELL DIAMETER (inches)	GROUND LEVEL TO H2O SURFACE IN FEET	SURFACE TO WELL BOTTOM IN FEET	SCREEN DEPIH (ft)	WEIL CAPACITY (gallons)	EVACUATION VOLUME (GALLONS)	EVACUATION METHOD	COMMENTS:
Filher Broket Lint Compraise	. 2 dru	me (I labled late. Yourd Collected.	A & B) and	Composi	ted in			
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	and	Collected.			/ /			
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FORT LAUDERDALE · SAVANNAH

### TOXICITY CHARTERISTIC LEACHING PROCEDURE

ENGINEERS & SCIENTIST 020-083193 CLIENT: SAMPLE NUMBER:

LOCATION: DRUM COMPOSITE LINT BASKET

ADDITIONAL DATA: IPC/PLANT CITY
SAMPLED BY: PAT FOX, CLARK
SUBMITTED BY: PAT FOX, CLARK
DATE SAMPLED: 08/30/93
DATE REPORTED: SEPT 17 1993
REVISION: 0

#86144 #E86006 #828,829 #96015 #FL095 #870206G 08/31/93 SOIL FL DRINKING WATER: FL ENVIRONMENTAL: GEORGIA:

SOUTH CAROLINA:

EPA: FDER COAP: DATE RECEIVED: SAMPLE MATRIX:

ANALYTE	METHOD	RESULT	UNITS	REGUL CO	ATORY NC.
	<del></del>		<del></del>		·
ARSENIC TCLP BARIUM TCLP CADMIUM TCLP CHROMIUM TCLP LEAD TCLP MERCURY TCLP SELENIUM TCLP SILVER TCLP CHLORDANE TCLP 2,4-D TCLP ENDRIN TCLP HEPTACHLOR TCLP LINDANE TCLP METHOXYCHLOR TCLP	1311/7060 1311/7080 1311/7131 1311/7191 1311/7421 1311/7470 1311/7760 1311/608 1311/608 1311/608 1311/608	0.004 -0.05 -0.05 -0.05 0.09 -0.0002 -0.002	mg/l mg/l mg/l mg/l mg/l mg/l mg/l	5.0 100.0 1.0 5.0 5.0 0.2 1.0 5.0 30 10000 20 8 400	mg/l mg/l mg/l mg/l mg/l mg/l ug/l ug/l ug/l ug/l
TOXAPHENE TCLP SILVEX TCLP BENZENE TCLP CARBN TETRACHLORIDE TCLP CHLOROBENZENE TCLP CHLOROFORM TCLP 1,2-DICHLOROETHANE TCLP 1,1-DICHLORETHYLENE TCLP HEXACHLOROETHANE TCLP METHYL ETHYL KETONE TCLP TETRACHLOROETHYLENE TCLP TRICHLOROETHYLENE TCLP VINYL CHLORIDE TCLP O-CRESOL TCLP M-CRESOL TCLP	1311/608 1311/608 1311/615 1311/624 1311/624 1311/624 1311/624 1311/624 1311/624 1311/624 1311/624 1311/624 1311/625 1311/625	6.45 -1 -1 -1 -1 -5 5.26 -1 -2.5 -2.5	ug/l ug/l ug/l ug/l ug/l ug/l ug/l ug/l	10000 500 1000 500 500 100000 6000 700 3000 200000 700 200 200 200 200 20	ug/l ug/l ug/l ug/l ug/l ug/l ug/l ug/l
P-CRESOL TCLP  1,4-DICHLOROBENZENE TCLP  2,4-DINITROTOLUENE TCLP  HEXACHLOROBENZENE TCLP  HEXACHLOROBUTADIENE TCLP  NITROBENZENE TCLP  PENTACHLOROPHENOL TCLP  PYRIDINE TCLP  245-TRICHLOROPHENOL TCLP  246-TRICHLOROPHENOL TCLP	1311/625 1311/625 1311/625 1311/625 1311/625 1311/625 1311/625 1311/625 1311/625 1311/625	-2.5 -1 -12.5 -2.5 -1 -2.5 -2.5 -5 -2.5	ug/l ug/l ug/l ug/l ug/l ug/l ug/l ug/l	200000 7500 130 130 500 2000 100000 5000 400000 2000	ug/l ug/l ug/l ug/l ug/l ug/l ug/l ug/l

IF YOU HAVE ANY QUESTIONS PLEASE CONTACT ME.

Ť. 1.

LYLE A. JOHNSON LAB MANAGER



July 29, 1993

Mr. Garry R. Allen President International Petroleum Corporation 105 South Alexander Street Plant City, Florida 33566

> Soil sampling results Re:

Dear Mr. Allen:

Enclosed please find the Spectrum laboratory results for the soil sample collected by a representative of Edward E. Clark Engineers-Scientists, Inc. (CLARK) on June 28, 1993. The sample was collected from the grass area at the west end of the IPC facility, from the area show in the picture attached to the Warning Notice dated April 19, 1993.

The soil sample (labeled SB-1) was collected in accordance with procedures specified in the CLARK approved ComQAP (870224G) by using a stainless steel hand-held split spoon sampler. The soil sample was taken from land surface to a depth of 1-foot below land surface (BLS). The sampler was decontaminated prior to use and the soil placed in pre-cleaned 250 ml glass sample jars, properly labeled and transported to the laboratory. The sample was analyzed for Total Recoverable Petroleum Hydrocarbons (TRPH) using EPA Method 9073.

Please contact me if you have any questions or comments.

Yours truly,

Edward E. Clark, Ph.D., P.E.

President

EEC/bjk

### CHAIN OF CUSTODY RECORD



Laboratories, Inc.

FORT LAUDERDALE - SAVANNAH

1460 W. McNab Road Ft. Lauderdale, FL 33309 (305) 978-6400 630 Indian Street Savannah, GA 31401 (912) 238-5050

Project Name	or Number		Client N	ame .		La	borat	огу А	nalysi	5/					· · · · · · · · · · · · · · · · · · ·
Project Location IPL PLANT	on City	-	CLAR 7270 MIAM	K ENGINEERS. NW 1245t.,	Suite 140 26					7/					
LCN	Sample Number	Date	Time	Sample Matrix	Container (s)	//				/	//	//		Comme	ents <sup>*</sup>
021-062993	SB-1	4/28/93	10:20	SOIL	Z	X							SB:	-soil L	wing
722-042 <b>993</b>	WS-1	6/2843	10:40	SUIL FILTER BASKET LINT COMPOSITE	2		X	<u> </u>					W5:	= auste	wing Sample
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SAMPLED BY:	JAMM			<del></del>	The			Du	سلمية	الم, د	Dlu	she	(	-28-93	4:16 PM
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Laboratories, Inc.

FORT LAUDERDALE . SAVANNAH

### RESULTS OF ANALYSIS

SAMPLE NUMBER LOCATION:

ADDITIONAL DATA:
SAMPLED BY:
SUBMITTED BY:
DATE SAMPLED:
DATE REPORTED:
DATE REPORTED:

REVISION:

CLIENT: ENGINEERS & SCIENTIST

021-062993 9277.02/SB-1 IPC PLANT CITY JAMAL DWIGHT SLUSHER 06/28/93 1020 JULY 13 1993

FL DRINKING WATER: FL ENVIRONMENTAL: GEORGIA:

#86144 #E86006 #828,829 #96015 SOUTH CAROLINA
EPA
FDER COAP
DATE RECEIVED
SAMPLE MATRIX #FL095 #870206G 06/28/93 SOIL

Parameter

Method

Results (-=<)

Units

Analysis Date and Time

Analyst

TRPH IN SOLID

**EPA 9073** 

20.7

mg/kg

930712 165630 `

RLH

LYLE A. JOHNSON LAB MANAGER LYLE A.



Laboratories, Inc.

FORT LAUDERDALE · SAVANNAH

# TOXICITY CHARTERISTIC LEACHING PROCEDURE

CLIENT: ENGINEERS & SCIENTIST

SAMPLE NUMBER: 022-062993

LOCATION: 9277.02/WS-1

ADDITIONAL DATA: IPC PLANT CITY

SAMPLED BY: JAMAL

SUBMITTED BY: DWIGHT SLUSHER

DATE SAMPLED: 06/28/93 1040

DATE REPORTED: JULY 21 1993

REVISION: 0

FL DRINKING WATER: #86144
FL ENVIRONMENTAL: #E86006
GEORGIA: #828,829
SOUTH CAROLINA: #96015
EPA: #FL095
FDER COAP: #870206G
DATE RECEIVED: 06/28/93
SAMPLE MATRIX: SOIL

ANALYTE	METHOD	RESULT (- = <)	UNITS		ULATORY CONC.	
ARSENIC TCLP BARIUM TCLP CADMIUM TCLP CHROMIUM TCLP CHROMIUM TCLP LEAD TCLP MERCURY TCLP SELENIUM TCLP SELENIUM TCLP SILVER TCLP CHLORDANE TCLP CHLORDANE TCLP ENDRIN TCLP HEPTACHLOR TCLP LINDANE TCLP METHOXYCHLOR TCLP TOXAPHENE TCLP SILVEX TCLP BENZENE TCLP CARBN TETRACHLORIDE TCLP CHLOROBENZENE TCLP CHLOROFORM TCLP 1,2-DICHLOROETHANE TCLP HEXACHLOROETHANE TCLP METHYL ETHYL KETONE TCLP TETRACHLOROETHYLENE TCLP TRICHLOROETHYLENE TCLP VINYL CHLORIDE TCLP VINYL CHLORIDE TCLP O-CRESOL TCLP M-CRESOL TCLP P-CRESOL TCLP 1,4-DICHLOROBENZENE TCLP P-CRESOL TCLP HEXACHLOROBENZENE TCLP HEXACHLOROBENZENE TCLP HEXACHLOROBENZENE TCLP HEXACHLOROBENZENE TCLP NITROBENZENE TCLP PENTACHLOROPHENOL TCLP PYRIDINE TCLP 245-TRICHLOROPHENOL TCLP 245-TRICHLOROPHENOL TCLP	1311/7060 1311/7080 1311/7131 1311/7421 1311/7471 1311/7740 1311/608 1311/608 1311/608 1311/608 1311/608 1311/608 1311/608 1311/624 1311/624 1311/624 1311/624 1311/624 1311/624 1311/624 1311/624 1311/624 1311/625 1311/625 1311/625 1311/625 1311/625 1311/625 1311/625 1311/625 1311/625 1311/625 1311/625 1311/625 1311/625 1311/625 1311/625 1311/625 1311/625	0.003 0.72 0.0021 0.003 0.071 -0.0002 -0.001 -1 -1 -1 -1 -1 -1 -1 -1 -1 -	mg/     mg/	5.0 100.0 1.0 5.0 5.0 30 10000 10000 500 10000 500 10000 500 700 200000 200000 200000 200000 200000 130 200000 200000 200000 200000 130 20000 2000000	mgg/ll mgg/ll mgg//ll mg//ll	
•	-		-3/-	2000	ug/l	

IN YOU HAVE ANY QUESTIONS PLEASE CONTACT ME. 1.

> MOSNHOR LYLE A. LAB MANÁGER

1460 W. McNab Road, Ft J.auderdale, Ft, 33309 - Phone: (305) r. ze o year

### CHAIN OF CUSTODY RECORD



Laboratories, Inc.

FORT LAUDERDALE . SAVANNAH

1460 W. McNab Road Ft. Lauderdale, FL 33309 (305) 978-6400 630 Indian Street Savannah, GA 31401 (912) 238-5050

Project Name	or Number	-	Client N	ame	Sugares	La	abora	lory A	nalysi	S					· · · · · · · · · · · · · · · · · · ·
Project Location	on City		7270 MIAM	NW 124 St.	Suite 140 26		/			5] 					
LCN	Sample Number	Date	Time	Sample Matrix	Container (s)				//	/	//	//	// c	omme	nts
21-062993	SB-1	4/28/93	10:20	SOIL	÷ 2	X							5B=20	il le	oring
12-062993	WS-1	6/2843	10:40	SOIL FILTER BASKET LINT COMPOSITE	3		X						w5 = a	us te	oring Sampl
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FORT LAUDERDALE - SAVANNAH

### TOXICITY CHARTERISTIC LEACHING PROCEDURE

CLIENT: SAMPLE NUMBER:

ENGINEERS & SCIENTIST 013-072993

LOCATION: FILTER BASKET LINT COMP.
ADDITIONAL DATA: I.P.C. INC.
SAMPLED BY: PAT FOX, CLARK
SUBMITTED BY: RALPH TARDIF, SPECTRUM
DATE SAMPLED: 07/27/93 0810
DATE REPORTED: AUG. 9 1993
REVISION: 0

REVISION:

#86144 #E86006 #828,829 #96015 #FL095 #870206G 07/29/93 SOIL FL DRINKING WATER: FL ENVIRONMENTAL: GEORGIA:

SOUTH CAROLINA:
EPA:
FDER COAP:
DATE RECEIVED:
SAMPLE MATRIX:

ug/l

2000

ANALYTE	METHOD	RESULT (- = <)	UNITS	REGULI COI	ATORY NC.
			****	<u></u>	
ARSENIC TCLP	1311/7060	0.009	mg/l	5.0	mg/l
BARIUM TCLP	1311/7080	3.77	mg/l	100.0	mg/1
CADMIUM TCLP	1311/7131	-0.1	mg/l	1.0	mg/1
CHROMIUM TCLP	1311/7191	0.30	mg/l	5.0	mg/1
LEAD TCLP	1311/7421	0.14	mg/l	5.0	mg/l
MERCURY TCLP	1311/7471	-0.0002	mg/l	0.2	mg/1
SELENIUM TCLP	1311/7740	-0.002	mg/l	1.0	mg/l
SILVER TCLP	1311/7760	-0.01	mg/l	5.0	mg/l
CHLORDANE TCLP	1311/608	-1	ug/l	30	ug/l
2,4-D TCLP	1311/615	-1	ug/l	10000	ug/l
ENDRIN TCLP	1311/608	-1	ug/l	20	ug/l
HEPTACHLOR TCLP	1311/608	-1	ug/l	8	ug/l
LINDANE TCLP	1311/608	-1	ug/l	400	ug/l
METHOXYCHLOR TCLP	1311/608	-1	ug/l	10000	
OXAPHENE TCLP	1311/608	-10	ug/l	500	ug/l
SILVEX TCLP	1311/615	-1	ug/l	1000	ug/l
BENZENE TCLP	1311/624	2.7	ug/l	500	ug/l
ARBN TETRACHLORIDE TCLP	1311/624	-1	ug/l	500	ug/l
HLOROBENZENE TCLP	1311/624	-1	ug/l	100000	ug/l
HLOROFORM TCLP	1311/624	-1	ug/l	6000	ug/l
,2-DICHLOROETHANE_TCLP	1311/624	-1	ug/l	500	ug/l
,1-DICHLORETHYLENE TCLP	1311/624	<b>-1</b>	ug/1	700	ug/l
EXACHLOROETHANE TCLP	1311/624	-1	ug/1	3000	ug/l
ETHYL ETHYL KETONE TCLP	1311/624	<b>-</b> 5	ug/l	200000	ug/l
ETRACHLOROETHYLENE TCLP	1311/624	2.0	ug/l	700	ug/l
RICHLOROETHYLENE TCLP	1311/624	-1	ug/l	500	ug/l
INYL CHLORIDE TCLP	1311/624	-1	ug/l	200	ug/l
O-CRESOL TCLP	1311/625	15.8	ug/l	200000	ug/l
M-CRESOL TCLP	1311/625	-1	ug/l	200000	ug/l
P-CRESOL TCLP	1311/625	3.7	ug/l	200000	ug/1
,4-DICHLOROBENZENE TCLP	1311/625	-1	ug/l	7500	ug/l
4-DINITROTOLUENE TCLP	1311/625	<del>-</del> 5	ug/l	130	ug/l
EXACHLOROBENZENE TCLP	1311/625	-1	ug/l	130	ug/l
HEXACHLOROBUTADIENE TCLP	1311/625	<b>-</b> 1	ug/l	500	ug/l
IITROBENZENE TCLP	1311/625	-1	ug/l	2000	ug/l
PENTACHLOROPHENOL TCLP	1311/625	-1	ug/l	100000	ug/l
PYRIDINE TCLP	1311/625	<del>-</del> 5	ug/l	5000	ug/l
245-TRICHLOROPHENOL TCLP	1311/625	-1	ug/l	400000	ug/l
A S-TRICUI OPORUENOI TOIR	1211/626	-	275	2000	-21,2

IF YOU HAVE ANY QUESTIONS PLEASE CONTACT ME.

246-TRICHLOROPHENOL TCLP

4

LYLE A. OHNSON LAB MANAGER

ug/l

1311/625

### CHAIN OF CUSTODY RECORD



Laboratories, Inc.

1460 W. McNab Road Ft. Lauderdale, FL 33309 (305) 978-6400

630 Indian Street Savannah, GA 31401 (912) 238-5050

Project Name	or Number	Client Name					Laboratory Analysis							
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LON	Number	Date	Time	Matrix	Container (s)	/4°/		7/					Comm	ents
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Laboratories, Inc.

FORT LAUDERDALE - SAVANNAH

# TOXICITY CHARTERISTIC LEACHING PROCEDURE

ENGINEERS & SCIENTIST 022-061193 9277.02/1 IPC PLANT CITY, FL CLIENT

CLIENT:
SAMPLE NUMBER:
LOCATION:
ADDITIONAL DATA:
SAMPLED BY:
SUBMITTED BY:
DATE SAMPLED:
DATE REPORTED:
REVISION AIR EXPRESS 06/10/93 JUNE 27 199

REVISION:

FL DRINKING WATER: FL ENVIRONMENTAL: #86144 #E86006 #828,829 #96015 GEORGIA: SOUTH CAROLINA: EPA:
FDER COAP:
DATE RECEIVED:
SAMPLE MATRIX: #FL095 #870206G 06/11/93 SOLID

ANALYTE	METHOD	RESULT (- = <)	UNITS	REGUL.	ATORY NC.
				•	
ARSENIC TCLP BARIUM TCLP CADMIUM TCLP CHROMIUM TCLP LEAD TCLP MERCURY TCLP SELENIUM TCLP SILVER TCLP CHLORDANE TCLP ENDRIN TCLP ENDRIN TCLP HEPTACHLOR TCLP LINDANE TCLP METHOXYCHLOR TCLP TOXAPHENE TCLP SILVEX TCLP BENZENE TCLP CARBN TETRACHLORIDE TCLP	1311/7060 1311/7080 1311/7131 1311/7191 1311/7471 1311/7740 1311/7760 1311/608 1311/608 1311/608 1311/608 1311/608 1311/608 1311/608 1311/608	-0.002 0.70 -0.0001 -0.001 -0.0002 -0.002 -0.01	mg/l mg/l mg/l mg/l mg/l mg/l mg/l	5.0 100.0 1.0 5.0 0.2 1.0 5.0 30 10000 20 8 400 10000 500 10000	mg/l mg/l mg/l mg/l mg/l mg/l ug/l ug/l ug/l ug/l ug/l
CARBN TETRACHLORIDE TCLP CHLOROBENZENE TCLP CHLOROFORM TCLP 1,2-DICHLOROETHANE TCLP 1,1-DICHLORETHYLENE TCLP HEXACHLOROETHANE TCLP METHYL ETHYL KETONE TCLP TETRACHLOROETHYLENE TCLP TRICHLOROETHYLENE TCLP VINYL CHLORIDE TCLP O-CRESOL TCLP M-CRESOL TCLP P-CRESOL TCLP 1,4-DICHLOROBENZENE TCLP 2,4-DINITROTOLUENE TCLP HEXACHLOROBENZENE TCLP HEXACHLOROBUTADIENE TCLP NITROBENZENE TCLP PENTACHLOROPHENOL TCLP 245-TRICHLOROPHENOL TCLP	1311/624 1311/624 1311/624 1311/624 1311/624 1311/624 1311/624 1311/624 1311/625 1311/625 1311/625 1311/625 1311/625 1311/625 1311/625 1311/625 1311/625 1311/625 1311/625 1311/625 1311/625	-0.5 -0.5	ug/1 ug/1 ug/1 ug/1 ug/1 ug/1 ug/1 ug/1	500 100000 500 700 3000 200000 200000 200000 200000 200000 130 130 500 2000 100000 40000	ug/l ug/l ug/l ug/l ug/l ug/l ug/l ug/l

IF YOU HAVE ANY QUESTIONS PLEASE CONTACT ME.

JOHNSON LAB MANAGER

### **BEST AVAILABLE COPY**

əlüdgə TCLP Analysis Jugh October 1996 June 1993 .

	<b>国际的影响</b>	<b>斯拉纳的</b>	对原则是 <mark>新创造</mark>	(14)(3)(A)(14)(A)(4)(A)(A)(A)(A)(A)(A)(A)(A)(A)(A)(A)(A)(A)	Concentra	tion*(mg	//VPATOSOCIAL ELECT	ati tatan i tamini		
(Compound )	Sampled	Sample	Sample	<b>黎FDER</b>	Sample	d Sampler	(I) services		場合が特別でき	विवाहें दिस्तरे होते है। इ.स.च्या के सम्बद्ध
	106/28/93	07/27/93	08/30/93	引 Split 福	09/27/93	ation#(mg   Sample   10/28/93	1 641 161	ampled	Sample	TCLP
Arsenic describer the control of the	\$ 0.003	a 0.009 fr	30.00434	M(BDL)(B)	The second second	-		11.1/20/95	10/17/96	Criteri
Barium	0.72	3.77	BDL	0.5	I DDF	0.003	BDL	0.003	BDL	5.0
Gadmium as a constant	五0.002拉	與BDL機		BDL	1.02	0.31	0.55	0.22	0.00	100
Chromium	0.003	0.30	BDL	BDL				&¢BDL.	20.002	1.0
Lead Harry Control	暴0.071数	50±0.14 %		数(BDL)	0.04	0.04	BDL	BDL .	BDL	5.0
Mercury	BDL	BDL	BDL	BDL	BDL	0.15	14-2		1 =	5.0
Selenium: West Selenium	磁BDL版	In BDL and	基 BDL 设有	BDL BDL	BDL BBDL	0.0002	0.001	0.0005		0.2
Silver	BDL	BDL	BDL	BDL BDL	BDL BDL	BDL	U. BDL 16	1	: BDL	1.0
genzene estat describis	承0.005点		##0.007s#	ش0.010 <u>ين</u>	BDL <sub>20</sub>	BDI.	0.09	BDI	BDL_	5.0
Carbon Tetrachloride	BDL	BDL	BDL	BDL	BDL BDL	0.00113 BDL	BDL:	0.00085	BDL	0.5
hlorobenzene	线BDD流	<b>益版</b> BDL存储	高BDL企		BDL <sub>124</sub>	BDL:	BDL	BDL	BDL	0.5
Chloroform	BDL	BDL	BDL	BDL	BDL	0.008	BDL BDL	37. BDL 3.	BDL	<u> </u>
12是Dichloroethanes版	點BDL磁	與BDL藝	與BDL键	底 BDL 級	<b>國BDL</b> 家	BDLN	BDL 器BDLを	BDL	BDL.	6.0
,1-Dichloroethylene	BDL	BDL	BDL	BDI	BDL	BDL	BDL BDL	BDL BDL	BDL	9.5
exachloroethane 4.2.2.		庭BDL资	部BDL鐵	松野NR製造	羅BDL製品	BDL	数BDL滤	新BDLA電	BDL	0.7
lethyl Ethyl Ketone	BDL	RDF	BDL	NR	BDL	0.034	BDL	0.00758		##3.0
etrachloroethylene 🥨	据0.002数		≧0.005ቜ	接0.007点	#0.003	BDL	BDL	\$0.00738	BDL 38BDI346	200
richloroethylene	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL BDL		<u>;::0.7</u>
/inyl/Chloride		総BDL級	級BDLIG	BDL BDL	AN BOLLEY	BDL		BDL BDL BDL	BDL 器BDL器	0.5
-Cresol	0.041	0.016	BDL	NR	BDL	0.001	BDL	0.00244		±₩0.2#
n≅Gresola See all a		版BDL版	應BDE讓	腦NR認	88 BDL	BDL	要BDDia	20.00244 深BDL源	BDL	200
-Cresol	0.018	0.004	BDL	NR	BDL	0.006	BDL	0.00135	BDL偏	<u> </u>
14 Dichlerobenzenea	数BDL题	超BDL滤	國BDL號	游BDL组件	孫BDI藍				BDL 300 DD 1800	200
4-Dinitrotoluene	BDL	BDL	BDL	NR	BDL	BDL	BDL	BDL BDL	BDL BDL	2.7.5
exachlorobenzene and	器BDI逐		福BDL稳	類別R 類別	<b>疑BDL</b> 级				WBDU路	0.13 690到3
lexachlorbutadiene	BDL	BDL	BDL	NR	BDL	BDL	BDL	BDL	BDL BDL	0.5
litrobenzene de de		題BDL號	基BDL線	温速NR 基值	BBDL/AC				器BDL盛	2.0
Pentachlorophenol	BDL	BDI.	BDL	NR	BDL	0.042	BDL	BDL	BDL	100
Ryridine will and was a second	<b>國品品級</b>		統BDL機	<b>WINR</b> 協	#BDL				DEBOLUS	13/15.0
4.5-Trichlorophenol	BDL	BDL	BDL	NR NR	BDL	BDL	BDL	BDL		
4,6当Trichlorophenol	鐵BDL容	劇BDL印象	翻BDL键	级镁NR数型	顧BDL製料	W BD BE	SEBDL SA		WARD THE	世紀

Not Reported by FDEP (\*) Maximum concentration for non—hazardous ♣ ♀ ♀ (BDL) Below Laboratory Detection Limits (NR)

BD0ratories

FORT LAUDERDALE - SAVANNAN,

FI. Lauderdale, FL 33309 (305) 978-6400

Savanı JA 31401 (912) 238-5050

· 《中华·李文德·李文德· 《《《《中文》等,《中文》等。

Project Name or Number Client Name : TWERNITIONAL TETRALENEN (SPA) 105 S ALEXANDER STREET, Laboratory Analysis Project Location, RAUT CITY PLANT CITY, FL 33599 Sample Sample LCN · Number Date Time Matrix Container (s) 001-. Comments FILTER EASILET WATER FILTER BASKET 0830 1018910 LINT COMPOSITE CONPOSITE AMY: GARRY ALLET Transfer Item • Transfors Number Number Rosinquished by: Accepted by: amen 2 3 Samples that are determined to be hazardous will be returned to submitter.

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Revision: 0 Date: 6-23-97

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Page 6 of 8



Laboratorios, Inc.

FORT LAUDERDALE . SAVANNAH

# TOXICITY CHARTERISTIC LEACHING PROCEDURE

CLIENT: NUMBER: SAMPLE

LOCATION: ADDITIONAL DATA:

ENGINEERS & SCIENTISTS 007-101896 FILTER BASKET LINT INT. PETROLEUM-COMP. KEN BAUGHMAN, CLARK FEDERAL EXPRESS 10/17/96 0830 NOV. 5 1996

SAMPLED BY:
SUBMITTED BY:
DATE SAMPLED:
ATE REPORTED:
REVISION:

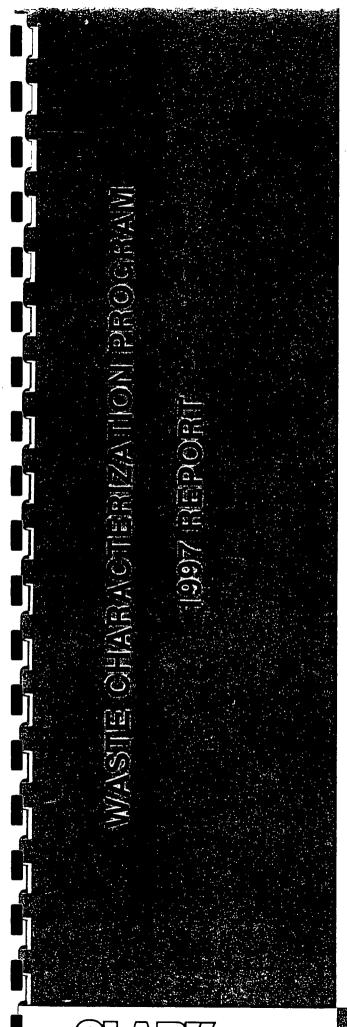
FL DRINKING WATER:
FL ENVIRONMENTAL:
GEORGIA:
SOUTH CAROLINA: #86144 #E86006 #2000 #96015

FPA: FDEP CQAP: DATE RECEIVED: SAMPLE MATRIX: #FL095 #870206G 10/18/96 SOLID

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ANALYTE	METHOD	RESULT (- = <)	UNITS.	REGULATORY CONCENTRATION
			<del></del>	
ARSENIC TCLP BARIUM TCLP CADMIUM TCLP CHROMIUM TCLP LEAD TCLP- MERCURY TCLP	1311/7060 1311/7080 1311/7131 1311/7191 1311/7421 1311/7471	0.00 6.33 0.0020 0.00	mg/1 mg/1 mg/1 mg/1 mg/1	5.0 mg/l 100.0 mg/l 1.0 mg/l 5.0 mg/l 5.0 mg/l
SELENIUM TCLP SILVER TCLP CHLORDANE TCLP 2,4-D TCLP SILVEX TCLP ENDRIN TCLP HEPTACHLOR TCLP LINDANE TCLP METHOXYCHLOR TCLP TOXAPHENE TCLP	1311/740 1311/7740 1311/760 1311/615 1311/615 1311/608 1311/608 1311/608 1311/608	0.00 0.00 0.00	mg/l mg/l mg/l ug/l ug/l ug/l ug/l ug/l	0.2 mg/l 1.0 mg/l 5.0 mg/l 30 ug/l 10000 ug/l 20 ug/l 8 ug/l 400 ug/l 10000 ug/l
BENZENE TCLP CARBN TETRACHLORIDE TCLP CHLOROSENZENE TCLP CHLOROFORM TCLP 1,2-DICHLOROETHANE TCLP 1,1-DICHLORETHYLENE TCLP METHYL ETHYL KETONE TCLP TETRACHLOROETHYLENE TCLP TRICHLOROETHYLENE TCLP VINYL CHLORIDE TCLP O-CRESOL TCLP	1311/624 1311/624 1311/624 1311/624 1311/624 1311/624 1311/624 1311/624 1311/624 1311/625	0.00 0.00 0.00 0.00 0.00 0.00 0.00	ug/1 ug/1 ug/1 ug/1 ug/1 ug/1 ug/1 ug/1	500 ug/l 500 ug/l 500 ug/l 100000 ug/l 6000 ug/l 700 ug/l 200000 ug/l 500 ug/l 200 ug/l 200 ug/l 200 ug/l
-M-CRESOL-TCLP P-CRESOL TCLP 1,4-DICHLOROBENZENE TCLP 2,4-DINITROTOLUENE TCLP HEXACHLOROBENZENE TCLP HEXACHLOROBUTADIENE TCLP HEXACHLOROETHANE TCLP NITROBENZENE TCLP PENTACHLOROPHENOL TCLP PYRIDINE TCLP 245-TRICHLOROPHENOL TCLP 146-TRICHLOROPHENOL TCLP	1311/625 1311/625 1311/625 1311/625 1311/625 1311/625 1311/625 1311/625 1311/625 1311/625 1311/625	0.00 0.00 0.00 0.00 0.00 0.00 0.00	ug/l ug/l ug/l ug/l ug/l ug/l ug/l ug/l	200000 ug/l 200000 ug/l 7500 ug/l 130 ug/l 130 ug/l 500 ug/l 3000 ug/l 2000 ug/l 2000 ug/l 400000 ug/l 2000 ug/l 400000 ug/l

JOHNSON



International Petroleum Corporation 105 South Alexander Street Plant City, Florida 33599

Yearly Sampling and Analysis for Sump Waste and Filter Basket Lint November 1997

Project 9277

Prepared By:

Edward E. Clark Engineers-Scientists, Inc. Miami, Florida

**December 2, 1997** 



EDWARD E. GLARK ENGINEERS. - SCIENTISTS, INC. 22700NWalchStreet Suite-7403Miamis Florida 3312.6

# WASTE CHARACTERIZATION PROGRAM

**International Petroleum Corporation** 105 South Alexander Street Plant City, Florida 33599

Yearly Sampling and Analysis for Sump Waste and Filter Basket Lint November 1997

Project 9277

Prepared By:

Edward E. Clark Engineers-Scientists, Inc. Miami, Florida

**December 2, 1997** 

Away 22-92

EDWARD E. CLARK ENGINEERS-SCIENTISTS, INC. 7270 NW 12th Street, Suite 740, Miami, FL 33126

engineers-scientists

### 1.0 INTRODUCTION

International Petroleum Corporation (IPC) is located at 105 South Alexander Street, Plant City, Hillsborough County, Florida and operates a used oil re-refinery. Process waste from the sumps and in-line pump filter baskets are collected into 55-gallon DOT shipping drums throughout the month. At the end of each month, this combined non-hazardous waste is manifested and transported to Clark Environmental, Inc.(CEI) located at 755 Prairie Industrial Parkway, Mulberry, Florida, for solidification prior to disposal at a permitted disposal facility.

In June 1993 IPC initiated a five month program of extensive laboratory analyses of its waste material. The purpose of this sampling program was to develop a more extensive data base on "sludge" consisting of sump waste and pump filter basket lint. This effort involved sampling of the monthly accumulation of waste material and TCLP analysis. The results of the five month study confirmed that the waste material is characterized as non-hazardous (RCRA). Following the five month program, IPC has voluntarily continued to collect and analyze the sump waste and pump filter basket lint on a yearly basis.

This report summarizes the sampling procedures used to collect the sludge samples and includes a discussion of the analytical results for the sample collected on November 5, 1997.

IPC & 1997 Update Report Project 9277 December 2, 1997

### 2.0 SLUDGE SAMPLING PROCEDURE

Samples from the accumulated waste material were collected by representatives of CLARK on November 5, 1997 in accordance with sampling procedures specified in CLARK'S approved Comprehensive Quality Assurance Plan (CompQAP # 870224). Aliquots of the combined sump and filter basket lint solids were collected from each accumulated drum and stored on-site during the sampling episode and placed in a pre-cleaned stainless steel mixing bowl. After sampling each drum, the composite waste sample was thoroughly mixed and then transferred into four (4) pre-cleaned sample jars supplied by Spectrum Laboratories, Inc. (SPECTRUM) Lauderdale, Florida. The four sample jars were stored in a shipping container with wet ice and transported to the laboratory for analysis.

SPECTRUM analyzed the TCLP leachate from the combined sample for volatile and extractable TCLP compounds by gas chromatography/mass spectrometry (GC/MS) using EPA Methods 624/625. TCLP metals were analyzed by either graphite furnace or cold vapor atomic absorption spectrophotometry, as appropriate. All analytical procedures were performed in accordance with SPECTRUM's FDEP approved Comprehensive Quality Assurance Plan (CompQAP # 870206).

IPC 1997 Update Report Project 9277 December 2, 1997

### 3.0 DISCUSSION OF RESULTS

The TCLP leachate from the combined sump and filter basket composite sample collected on November 5, 1997 and reported on November 14, 1997 was analyzed for TCLP volatile and extractable compounds and metals. A review of the analytical data, for the combined solid sample, shows that the solid sample, reported as sludge, shows that the material is classified as non-hazardous, as defined by the TCLP criteria. All TCLP parameters were below laboratory detection limits (BDL) except for small concentrations of the following: arsenic, barium, cadmium, lead, benzene and methyl ethyl ketone; all of which were well below maximum concentration for Toxicity Characteristic. The results of the 1997 sample are summarized in Table 1 along with the results from all previous sampling events. Copies of the laboratory's analytical results for the 1997 sampling event are enclosed in Appendix A.

IPC 1997 Update Report Project 9277 December 2, 1997

TABLES

TA TA VE

Table 1: Summary of TCLP Analyses
June 1993 through November 1997

					Con	centration	(mg/l)				
Compound	Sampled 06/28/93	Sampled 07/27/93	Sampled 08/30/93	FDEP Split	Sampled 09/27/93	Sampled	Sampled 09/16/94	Sampled 11/20/95	Sampled 10/17/96	Sampled 11/5/97	TCLP *
Arsenic	0.003	0.009	0.004	BDL.	BDL	0.003	BDL	0.003	BDL	0.004	5.0
Barium	0.72	3.77	BDL	0.5	1.02	0.31	0.55	0.22	6.33	0.50	100
Cadmium	0.002	BDL	BDL	BDL	0.04	0.02	BDL	BDL	0.002	0.09	1.0
Chromium	0.003	0.30	. BDL	BDL	0.04	0.04	BDL	BDL	BDL	BDL	5.0
Lead	0.071	0.14	0.09	BDL	0.14	0.15	0.20	0,14	0.025	0.16	5.0
Mercury	BDL	BDL	BDL	BDL	BDL	0.0002	0.001	0.0005	BDL	BDL	0.2
Selenium	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	1.0
Silver	BDL	BDL	BDL	BDL	BDL	BDL	0.09	BDL	BDL	BDL	5.0
Benzene	0.005	0.003	0,007	0.010	BDL	0.0011	BDL	0.00085	BDL	0,00063	0.5
Carbon Tetrachloride	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL BDL	0.5
Chlorobenzene	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	100
Chloroform	BDL	BDL	BDL	BDL	BDL	0.008	BDL	BDL	BDI	BDL	6.0
1,2-Dichloroethane	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	0.5
1,1-Dichloroethylene	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	0.7
Hexachloroethane	BDL	BDL	BDL	NR	BDL	BDL	BDL	BDL	BDL	BDL	3.0
Methyl Ethyl Ketone	BDL	BDL	BDL	NR	BDL	0.034	BDL	0.00758	BDL	0.123	200
Tetrachloroethylene	0.002	0.002	0.005	0.007	0.003	BDL	BDL	0.00129	BDL	BDL	0.7
Trichloroethylene	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	0.5
Vinyl Chloride	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	0.2
o-Cresol	0.041	0.016	BDL	NR	BDL	0.001	BDL	0.00244	BDL	BDL	200
m-Cresol	BDL	BDL	BDL	NR	BDL	BDL	BDL	BDL	BDL	BDL	200
p-Cresol	0.018	0.004	BDL	NR	BDL	0.006	BDL	0.00135	BDL	BDL	200
1,4-Dichlarobenzene	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	7.5
2,4-Dinitrotoluene	BDL	BDL	BDL	NR	BDL	BDL	BDL	BDL	BDL	BDL	0.13
Hexachlorobenzene	BDL	BDL	BDL	NR	BDL	BDL	BDL	BDL	BDL	BDL	0.13
Hexachlorbutadiene	BDL	BDL	BDL	NR	BDL	BDL	BDL	BDL	BDL	BDL	0.5
Nitrobenzene	BDL	BDL	BDL	NR	BDL	BDL	BDL	BDL	BDL	BDL	2.0
Pentachlorophenol	BDL	BDL	BDL	NR	BDL	0.042	BDL	BDL	BDL	BDL	100
Pyridine	BDL	BDL	BDL	NR	BDL	BDL	BDL	BDL	BDL	BDL	5.0
2,4,5-Trichlorophenol	BDL	BDL	BDL	NR	BDL	BDL	BDL	BDL	BDL	BDL	400
2,4,6-Trichlorophenol	BDL	BDL	BDL	NR	BDL	BDL"	BDL	BDL	BDL	⊗ BDL	2.0

Appendix

Laboratories, Inc. FORT LAUDERDALE • SAVANNAH

1460 W. McNab Road Ft. Lauderdale, FL 33309 (305) 978-6400

630 Indian Street Savannah, GA 31401 (912) 238-5050

Droject Marre	N	<del></del> -											(912) 200-	
Project Name	or Number		Client N	ame RK Enginee		La	bora	tory A	nalysi	s				
Project Location	on			KK Enginee	<u>rs</u>			1	7	7	7	7	///	
Project Location PLANT Ci	W, PLA	2.		_				/:/	/ /	/ /	/ /	/ /		
LCN	Sample Number	Date	Time	Sample Matrix	Container (s)	To v			//		\		Com	ments.
135-110697	Filter BAS Lint	11/5/97	0900		2	X	<b>V</b>							
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			Tran Num		• Transf Relinquish		l	A∝ept	ed by:		l.		Date	Time
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Laboratories, Inc.

FORT LAUDERDALE • SAVANNAH

# TOXICITY CHARTERISTIC LEACHING PROCEDURE

CLIENT: ENGINEERS & SCIENTISTS

SAMPLE NUMBER: 035-110697
LOCATION: FILTER LINT BASKET

ADDITIONAL DATA: 9277.02
SAMPLED BY: PAT FOX
SUBMITTED BY: PAT FOX
DATE SAMPLED: 11/05/97 0900
DATE REPORTED: NOV. 14 1997
REVISION: 0

FL DRINKING WATER: FL ENVIRONMENTAL: GEORGIA: SOUTH CAROLINA: #8614 #E860 #2000 #9601

FDEP COAP: DATE RECEIVED: SAMPLE MATRIX:

#FL09 #8702 11/06 SOIL

ANALYTE	METHOD	RESULT (- = <)	UNITS	REGULATORY CONCENTRATION		
					<del></del>	
ARSENIC TCLP	1311/7060	0.004	/1		پ.	
BARIUM TCLP	1311/6010	0.50	mg/l	5.0	mg/1	
CADMIUM TCLP	1311/6010	0.09	mg/l	100.0	mg/l	
CHROMIUM TCLP	1311/6010	0.00	mg/l	1.0	mg/1	
LEAD TCLP	1311/6010	0.16	mg/l	5.0	mg/l	
MERCURY TCLP	1311/7471	0.00	mg/l	5.0	mg/l	
SELENIUM TCLP	1311/7740	0.00	mg/1	0.2	mg/l	
SILVER TCLP	1311/6010	0.00	mg/l mg/l	1.0 5.0	mg/l	
CHLORDANE TCLP	1311/608		ug/1	30	mg/l	
2,4-D TCLP	1311/615		ug/1	10000	ug/l	
SILVEX TCLP	1311/615		ug/1	1000	ug/1	
ENDRIN TCLP	1311/608		ug/1	20	ug/l ug/l	
HEPTACHLOR TCLP	1311/608		ug/l	8	ug/l	
LINDANE TCLP	1311/608		ug/l	400	ug/1	
METHOXYCHLOR TCLP	1311/608		ug/l	10000	ug/l	
TOXAPHENE TCLP	1311/608		ug/l	500	ug/l	
BENZENE TCLP	1311/624	0.63	ug/l	500	ug/1	
CARBN TETRACHLORIDE TCLP	1311/624	0.00	ug/l	500	ug/l	
CHLOROBENZENE TCLP	1311/624	0.00	ug/l	100000	ug/l	
CHLOROFORM TCLP	1311/624	0.00	ug/l	6000	ug/l	
1,2-DICHLOROETHANE TCLP	1311/624	0.00	ug/l	500	ug/l	
1,1-DICHLORETHYLENE TCLP	1311/624	0.00	ug/l	700	ug/l	
METHYL ETHYL KETONE TCLP	1311/624	123	ug/l	200000	ug/l	
TETRACHLOROETHYLENE TCLP	1311/624	0.00	ug/l	700	ug/l	
TRICHLOROETHYLENE TCLP VINYL CHLORIDE TCLP	1311/624	0.00	ug/l	500	ug/1	
O-CRESOL TCLP	1311/624	0.00	ug/l	200	ug/l	
M-CRESOL TCLP	1311/625	0.00	ug/l	200000	ug/l	
P-CRESOL TCLP	1311/625	0.00	ug/l	200000	ug/l	
1,4-DICHLOROBENZENE TCLP	1311/625	0.00	ug/l	200000	ug/l	
2,4-DINITROTOLUENE TCLP	1311/625	0.00	ug/l	7500	ug/l	
HEXACHLOROBENZENE TCLP	1311/625	0.00	ug/l	130	ug/1	
HEXACHLOROBUTADIENE TCLP	1311/625	0.00	ug/l	130	ug/l	
HEXACHLOROETHANE TCLP	1311/625	0.00	ug/l	500	ug/l	
NITROBENZENE TCLP	1311/625	0.00	<b>ug/l</b>	3000	ug/l	
PENTACHLOROPHENOL TCLP	1311/625 1311/625	0.00	ug/1	2000	ug/l	
PYRIDINE TCLP	1311/625	0.00	ug/l	100000	ug/l	
245-TRICHLOROPHENOL TCLP	1311/625	0.00	ug/l	5000	ug/l	
246-TRICHLOROPHENOL TCLP	1311/625	0.00	ug/1	400000	ug/l	
	1311/023	0.00	ug/l	2000	ug/l	

JOHNSON LYLE A. LABORATORY MANAGER

877 F01 JAN 06 '98 10:10

12/29/97

Phone 941-682-5897

806 W. Beacon Road • Lakeland, Florida 33803

Fax 941-683-3279

Client

International Environmental Services, Inc.

105 South Alexander Street Plant City, Florida 33568

Attn.:

Mr. Mark Giaquinto

P. O. #:

Project:

International Petroleum Corporation

Reference:

Sludge Sample #970407 RAIL CALS

Sampled By:

MG

Sample Date:

12-29-97

Date Received:

12-29-97

Analysis Date:

12-30-97

Analyzed By:

GJF/JMC

### TOXICITY CHARACTERISTIC LEACHING PROCEDURE EPA METHOD 1311

(expressed as mg/L)

Parameters:	970407	Requiatory Limits, mg/L
Arsenio	<0.01	
Barlum	0.73	5.00
Cadmium	<0.01	100.00
Chromium	0.03	1.00
Lead	0.01	5.00
Mercury	<0.01	5.00
Selenium	<0.10	0.20
Silver	<0.01	1.00
	<b>~0.01</b>	5.00





FROTE PRO LEE

### ENVIRONMENTAL LABORATORY, INC.

# TANK Bottoms

### ANALYTICAL REPORT

CLIENT: International Petroleum Corp. of DE

505 S. Market Street

Wilmington DE 19801

MEPORTED: 10-25-95 RECEIVED: 10-09-95

WORK ORDER: L-955491

SAMPLE ID: Oil (Filter Dabris) (Tank Bottoms)

SAMPLING DATE: - -

TIME: BY:

REPORT TO: Ms. Kelly Brown

TCLP VOLATILES					
<u>ANALYSIS</u>	METHO	55	RESULT	UNIT	DATE/INITIAL
1,1-Dichlorosthene	8260	~	25	ug/L	10-17-95/090
1,2-Dichlorosthane	8260	•.	. 25	ug/5	10-17-95/DBC
Penzene	8260	<	25	ug/L	10-17-95/DBC
Carbon Tetrachloride	8260	•	25	ug/L	10-17-95/DBC
Chlorobenzene	8360	٠	25	ug/L	10-17-95/DBC
Chloreform	8250	۲,	25	ug/L	10-17-95/080
Methyl ethyl ketone	8250	•	25	ug/L	10-17-95/DBC
Tetrachloroethene	8250	<	25	ug/L	10-17-95/DRC
Trichloroethene	825C	<	25	ug/L	10-17-95/DBC
Vinyl Chloride	£75C	<	25	ug/L	10-17-95/050
TOUP SEMIVOLATILES	•				
ANALYSIS	WEIHO	<u>⊃</u> .	RESULT	TINU	DATE/INITIAL
1.4-Dichlorobenzene	€270	<	100	ug/L	10-20-35/D3C
Z,4-Dimitrotoluene	8270	<	100	ug/L	10-20-95/030
2,4,5-Trichlorophenol	8270	<	100	ug/L	10-20-95/030
2,4,6-Trichlorophenol	8270	ς.	100	ug/L	10-20-95/030
Cresol, total	E270		105	uc/L	
Haxachlorobenzena	8270		100	49/L	10-20-95/DBC
Hexachlorobutadiene	£270	•:	100	ug/L ug/L	10-20-95/030
Hexachloroethane	8270	· ·	100	ug/L	10-20-95/050
Nitrobenzene	E270	<	100	ug/L ug/L	10-20-95/030
Pentachlorophenol	€270	~	250	ug/L	10-20-55/000
Pyridine	8270	-:	100	ug/L	10-20-95/DBC 10-20-95/DBC
n/p-Cresol	E270	<	100		10-20-95/DBC
o-Cresci	8270	<	700		30-20-95/DBC
TCLF PESTICIDES					
<u> ANALYSIS</u>	CONTE	•	<u> </u>	<u>UNIT</u>	DATE/INITIAL
Chlordane	<b>3051</b>	5	15	ug/L	56.36 02/956
Charin	5081	· .	20		10-19-95/HLG 10-19-95/HLG
Reptachlor	8031	•	4	•	
Heptachlor epoxide	8031	ç	4		10-18-95/ELD 10-18-95/EDD
CONTRACTOR AND FOR A STATE OF A S				-	

909 W NOMIT ROAD • SINKING SERRIG, PA 19308 • TEL 610 670-8505 • TAX-610-670 5505

L-955491

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TCLP PESTICIDES ANALYSIS	<u>METHEM</u>		RESUL'I	UNIT	DATE/INITIAL
Lindane Kethoxychlor	8081 8081	< <	50 500	ug/L	10-18-95/KLG 10-18-95/KLG
Toxaphens	:308	<	250	aā\r ≅\≃	13-18-95/KLG
TCLP INORGANICS					
MALYSIS	<u>DOHTEN</u>		RESULT	<u> </u>	DATE/INITIAL
Arsenic	6010	<	0.50	mg/L	10-24-95/BAK
Sarium	6010		0.53	ing/L	10-24-95/3AK
Cadmium	6010	<	0.030	ng/I	10-24-95/341
Chromium	6010	<`	0.05	mg/L	10-24-95/9AX
Lead .	€010	<	0.20	mg/L	10-24-95/3AX
Mercury	7470	<	0.0003		10-23-95/377
Selenium	6010	e.	0.50	nig/L	10-24-95/BAK
Silver	<b>501</b> C	<	0.06	mg/L	10-24-95/BAK
pH, Final	904C		5.01	Units	10-13-95/BAK
pH. Initial	9040		7.58	Units	10-12-95/CEG
TCLP HERBICIDES			•		•
<u>ANALYSIS</u>	<u>CONTEM</u>		RESULT	UNIT	PATE/INITIAL
2,4-D	£150 •	<	5000	ug/L	10-20-95/KLG
2,4,5-TF (Silvex)	6130° •	•	500	ug/L	10-20-95/KLG

Revisioned by:

Karen D. Merrill Laboratory Director

<sup>\*</sup>Esterification by Standard Method 5640.

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MERICA

L-967184

• Quality Environmental Testing

### **ANALYTICAL REPORT**

REPORTED 10/18/96

RECEIVED: 10/03/96

WORK ORDER. L-967184

SAMPLING DATE: 09/29/96

TIME 12 30

BY: KB

CLIENT: International Petroleum Corp. of DE 505 S. Market Street

Wilmington, DE 19801

SAMPLE ID: Microsoparator Debris

REPORT TO, Mr. Kelly Brown

TCLP (1311) SEMIVOLATILES

TCLP (1311) #EMIVOLATILES ANALYSIS	F	<b>LESULT</b>	UNIT	METHOD	DETECTION LIMIT	ANALYST BLAITINI	DATE/TIA OF ANALY	
1.4-Dichlorobenzens	<	100	ug/L	8270	100	BLB	10/14/96 /	23.47
2.4,5-Trichlorophenol	<	100	ug/L	8270	100	818	1C/14/96 '	23:47
2,4,6-Trichlorophenol	<	100	ug/L	8270	100	BLB	10/14/96 /	23.47
2,4-Dinitrotoluene	<	100	ug/L	827¢	100	BL9	10/14/96 1	23 47
Cresol total		377	ug∕L	8270	100	BLB	10/14/98 /	23:47
Hexachioropenzene	<	:00	ug/L	8270	100	8L <del>3</del>	10/14/96 1	23 47
Hexachloroputadiene	<	100	ug/L	8270	100	BLB	10/14/96 1	23 47
Hexachloroethane	<	100	ug/L	8270	100	8L8	10/14/98 /	23,47
Narobenzana	<	100	ug/L	8270	100	8LB	10/14/96 /	23 47
Pentach or phenoi	<	100	ug/L	8270	100	BLB	10/14/96 :	23:47
Pyridine	<	100	ug/L	8270	100	BLB	10/14/95 :	23:47
m/p-Cresol		180	ug/L	8270	100	BLB	10/14/95	23 47
p-Crespi		197	. ug/.	8270	100	BLB	10/14/96 /	23:47
TCLP (1311) HERBICIDES				•	DETECTION	ANALYST	DATE/TIN	IE
BHOLYEIE	n	FRUT	THEFT	HETHIAN	LIMIT	1118 11 8	DE AMALY	-
2.4:5-TP (Silvex)	<	500	ug/_	8150#	500	PDB	10/17/96 /	15. 5
2,4.0	<	5000	nā\r	5150#	5000	PD8	10/17/96	15 15
TCLP (1311) INORGANICS ANALYSIS	. <b>R</b>	EBULT	UNIT	METHOD	DETECTION	ANALYST	OATE/TIN	
Arsenic	<	8.50	mg/L	7060	0.50	BAK	10/10/96	13:39
Barrum		0 59	mg/L	6012	0.30	BAK	10/10/96	13.39
Cadmium	<	0 03	mg/L	6010	0.03	BAK	10/10/96 /	13:39
Chrom:um	€	0.05	mg/L	6010	0.05	BAK	10/10/96	13.39
Lead	<	0.20	nal	8010	0.26	BAK	10/10/96	.3.38
Mercury	<	0 0005	TIQ.'L	7470	0.0005	JAB	10/10/96 :	149
Selentum	<	0 60	ng'L	6010	0.50	BAK	10/10/96	-3 35
Silver	<	0.06	ng/L	6010	C 08	BAK	10/10/98 '	.3.30
pH, Final		÷ 26	Unita	9040		PDB	10/08/96 /	08.DC
pH, Initial		7.99	Units	9040		P08	10/07/95	15.14
TCLP (1311) PESTICIDES ANALYSIS	R	ESULT	UNIT	METHOD	DETECTION LIMIT	ANALYST	DATE/TIM OF ANALY:	

L-967184



### • Quality Environmental Testing

TCLP (1311) PESTICIDES ANALYSIS	,	REBULT	UNIT	METHOD	DETECTION	ANALYST INITIALS	DATE/TIM OF ANALYS	_
Chicrdana	<	10	ug/L	3081	10	POB	13/15/96 /	15.05
Endrin	<	15	Ug/L	8081	15	PDB	10/15/96 /	15:05
Haptachlor .	<	4	ugrL	8081	4	PDB	10/15/96 /	18 05
Heptachlor epoxide	<	· 4	ug/L	8081	4	PDB	19/15/96 /	18:05
Lindane	•	50	ug/L	8081	50	PDB	10/15/98 /	15 05
Methoxychlor	<	500	ug/L	8081	500	PDB	10/15/95 /	15 05
Toxaphene	<	250	norL	8081	250	P08	10/15/96 /	16 05
TCLP (1311) VOLATILES ANALYSIS	F	IESULT	UNIT	METHOD	DETECTION LIMIT	ANALYST INITIALS	DATE/TIME EVJANA 90	-
1,1-Dichloroethene	<	50 0	ug/L	8250	50.0	BLB	10/11/96 /	05 38
1,2-Dichloroethane	<b>K</b>	80 C	ug/L	8260	50.0	818	10/11/98 /	05.38
Benzene	4	50 Q	ug/L	8260	50.0	BLB	10/11/36 /	05.38
Carbon Teirach.oride	<b>⋖</b> .	50.0	ug/L	8250	50.0	BIB	10/11/96 /	05:38
Chlorobenzene	<	50.0	ug.'L	8280	50 0	BFB	10/11/96 /	05.38
Chiarcform	<	50.0	ug/L	8260	50 0	BLB	10/1:/96 /	05:38
Methyl stryl kelone	<	200	ug/L	8263	200	BLB	10/11/96 /	
Tetrachioroethene	<	5D 0	ug/L	8260	5C 0	BLB		05:38
Trichloroethene	•	50.0	ug/L	6250			10/11/98 /	<b>05.38</b>
Vinyl Chloride	<	50.0	ugit	8263	50.0 50.0	BLB Blb	10/11/96 /	05:38 05:38

# Esterification by Standard Mathods 6640

NOTE: All results, except leachate analysis, reported on a dry weight basis.

Respectfully submitted by

Sporstory Director



ENVIRONMENTAL LABORATORY, INC.

### ANALYTICAL REPORT

CLIENT: International Petroleum Corp. of DE

505 S. Market Street

FROM PROJES

Wilmington DE 19801

MEPORTED: 10-25-95 RECEIVED: 10-09-95

WORK ORDER: L-955491

SAMPLE ID: Dil (Filter Dabris) (Tank Bottoms)

SAMPLING DATE: - -

TIME:

BY:

1865-25-50 v v v

REPORT TO: Ms. Kelly Brown

TCLP VOLATILES					
<u>ANALYSIS</u>	METH	<u>:02</u>	RESULT	UNIT	DATE/INITIAL
1,1-Dichloroethene	8260	<	25		
1,2-Dichlorosthane	826C			ug/L	10-17-95/030
Benzene	δ26C		25	ug/L	10-17-95/DBC
Carbon Tetrachloride			25	いました	10-17-95/030
Chlorobenzene	826C		25	ug/L	10-17-95/DBC
Chlorciorm	8260		25	ug/L	10-17-95/DBC
Methyl ethyl ketone	8250	۲,	25	ug/L	10-17-95/080
Tetrachloroethene	825C	•	25	ug/I,	10-17-95/DBC
Trichloroethene	8250	<	25	ug/L	10-17-95/DEC
Vinvi Chi	825C	<	25	ug/L	10-17-95/090
Vinyl Chloride	£25C	<	25	ug/L	10-17-95/DSC
TOLP SEMIVOLATILES  ANALYSIS	•				
	METHO	<u>55</u>	RESULT	TINU	JAITINI\STAU
1.4-Dichlorobenzene	8270	<	100	v. <del></del> /2	
Z, 4-Dinitrotoluene	8270	<	100	<u> </u>	10-20-35/DBC
2,4,5-Trichlorophenol	8270	` `	100	ug/L	10-20-95/030
2,4,6-Trichlorophenol	8270			ug/L	10-20-95/DBC
Cresol, total		<	100	ug/L	10-20-95/030
Hexachlorobenzene	8270	<	105	ug/L	10-20-95/DBC
Hexachlorobutadiene	8270	۲.	100	પછુ/દ	10-20-95/D3C
Hexachloroethane	€270	<	100		10-20-95/050
Nitrobenzene	8270	<	100		10-30-95/D3C
Pent-oblines	E270	<	100		10-20-55/000
Pentachlorophenol Pyridine	٤270	<	250	_	10-20-95/DBC
n/p-Cresol	8270	ત	ioc		10-20-95/DBC
o-Cresol	E270	<	100		
0-c16801	€270	<	100		10-20-95/DBC 90-20-95/DBC
TCLF PESTICIDES					;
ANALYSIS	RETHOD	-	RESULT	<u>unit</u> i	>>
Chlordane			<u>::=5,00</u>	<u> </u>	MIE/INITIAL
Dadrin .	8051	₹ '	15	ug/L 1	.C-19-95/ELG
	5081	<	.5		, v = 1 = = 2 = / 1
Reptachlor	8031	<			.0-18-95/XLT
Heptachfor epoxide	1208	ç	ءَ ۔		0-18-93/ELD
SERVINOMIL ROAD • SINVING SERVES, ES 160		-	•	್ತು/೬ 1	0-18-95/KDD

2509 W NOMÍC ROMO + 51 NY INCIDENTAGO PA 19408 + 18U 610 670-8505 + 1 AXI-610-670 6505

01/11/1004 11/00 11/10044110005

4-955491

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TCLP PESTICIDES ANALYSIS	<u> </u>	<u>RESUU'I</u>	UNIT	DATE/INITUAL
Dindane Methoxychlor Toxaphene	8081 < 8081 < 8081 <	50 500 250	ug/L ug/L	19-18-95/KLG 19-18-95/KLG 19-18-95/KLG
TCLP INORGANICS ANALYSIS	METHOD	RESULT	<u>17.17</u>	DATE/INITIAL
Arsenic Sarium Cadmium Chromium Lead Mercury Selenium Silver pH, Final pH. Initial	6010 < 6010 < 6010 < 6010 < 6010 < 6010 < 6010 < 6010 < 6010 < 6010 < 6010 < 6010 < 6010 < 6010 < 6010 < 6010 < 6010 < 6010 < 6010 < 6010 < 6010 < 6010 < 6010 < 6010 < 6010 < 6010 < 6010 < 6010 < 6010 < 6010 < 6010 < 6010 < 6010 < 6010 < 6010 < 6010 < 6010 < 6010 < 6010 < 6010 < 6010 < 6010 < 6010 < 6010 < 6010 < 6010 < 6010 < 6010 < 6010 < 6010 < 6010 < 6010 < 6010 < 6010 < 6010 < 6010 < 6010 < 6010 < 6010 < 6010 < 6010 < 6010 < 6010 < 6010 < 6010 < 6010 < 6010 < 6010 < 6010 < 6010 < 6010 < 6010 < 6010 < 6010 < 6010 < 6010 < 6010 < 6010 < 6010 < 6010 < 6010 < 6010 < 6010 < 6010 < 6010 < 6010 < 6010 < 6010 < 6010 < 6010 < 6010 < 6010 < 6010 < 6010 < 6010 < 6010 < 6010 < 6010 < 6010 < 6010 < 6010 < 6010 < 6010 < 6010 < 6010 < 6010 < 6010 < 6010 < 6010 < 6010 < 6010 < 6010 < 6010 < 6010 < 6010 < 6010 < 6010 < 6010 < 6010 < 6010 < 6010 < 6010 < 6010 < 6010 < 6010 < 6010 < 6010 < 6010 < 6010 < 6010 < 6010 < 6010 < 6010 < 6010 < 6010 < 6010 < 6010 < 6010 < 6010 < 6010 < 6010 < 6010 < 6010 < 6010 < 6010 < 6010 < 6010 < 6010 < 6010 < 6010 < 6010 < 6010 < 6010 < 6010 < 6010 < 6010 < 6010 < 6010 < 6010 < 6010 < 6010 < 6010 < 6010 < 6010 < 6010 < 6010 < 6010 < 6010 < 6010 < 6010 < 6010 < 6010 < 6010 < 6010 < 6010 < 6010 < 6010 < 6010 < 6010 < 6010 < 6010 < 6010 < 6010 < 6010 < 6010 < 6010 < 6010 < 6010 < 6010 < 6010 < 6010 < 6010 < 6010 < 6010 < 6010 < 6010 < 6010 < 6010 < 6010 < 6010 < 6010 < 6010 < 6010 < 6010 < 6010 < 6010 < 6010 < 6010 < 6010 < 6010 < 6010 < 6010 < 6010 < 6010 < 6010 < 6010 < 6010 < 6010 < 6010 < 6010 < 6010 < 6010 < 6010 < 6010 < 6010 < 6010 < 6010 < 6010 < 6010 < 6010 < 6010 < 6010 < 6010 < 6010 < 6010 < 6010 < 6010 < 6010 < 6010 < 6010 < 6010 < 6010 < 6010 < 6010 < 6010 < 6010 < 6010 < 6010 < 6010 < 6010 < 6010 < 6010 < 6010 < 6010 < 6010 < 6010 < 6010 < 6010 < 6010 < 6010 < 6010 < 6010 < 6010 < 6010 < 6010 < 6010 < 6010 < 6010 < 6010 < 6010 < 6010 < 6010 < 6010 < 6010 < 6010 < 6010 < 6010 < 6010 < 6010 < 6010 < 6010 < 6010 < 6010 < 6010 < 6010 < 6010 < 6010 < 6010 < 6010 < 6010 < 6010 < 6010 < 60	0.50 0.53 0.030 0.05 0.20 0.0003 0.50 0.06 5.01 7.56	mg/L mg/L mg/L mg/L mg/L mg/L mg/L mg/L	10-24-95/BAK 10-24-95/BAK 10-24-95/BAK 10-24-95/BAK 10-24-95/BAK 10-24-95/BAK 10-24-95/BAK 10-24-95/BAK 10-13-95/CDG
TCLP HERBICIDES ANALYSIS	CONTEN	RESULT	UNIT	DATE/INITIAL
2,4-D 2,4,5-TF (Silvex)	8150	5000 500	ug/L ug/L	10-20-95/KLG 10-20-95/KLG

Revigered by:

Karen L. Merrill Laboratory Director

<sup>\*</sup>Esterification by Standard Method 5640.

# Labs America

### Quality Environmental Testing

### **ANALYTICAL REPORT**

Client:

International Petroleum Corp. of DE

505 S.Market Street

Wilmington, DE 19801

Sample ID: Microseparator/Filter Debris/Tank Buttoms

REPORT TO: Mr. Tom Burdeshaw

Reported: 10/18/97

Received: 10/03/97

Work Order: Sampling Date:

L-967184 09/20/97

Time:

12:20 TB

					•		
TCLP (1311) SEMIVOLATIV	ÆS .			DETECTION	ANALYST	DATE/TIM	F
ANALYSIS	RESULTS	UNIT	METHOD		INITIALS	OF ANALY	_ 、
14 8:11							- N
1,4-Dichlorobenzens	< 100	ug/L	8270	100	BLB	10/14/97	23:47
2,4,5 – Trichlorophenol 2,4,5 – Trichlorophenol	< 100	ug/L	8270	100	BLB	10/14/97	23:47
2,4—Dinitrotoluene	< 100	ug/L	8270	100	BLB	10/14/97	23:47
Cresol Total	< 100 377	ug/L	8270	100	BLB	10/14/97	23:47
Hexachlorobenzene	< 100	ug/L	8270	100	BLB	10/14/97	23:47
Hexachlorobutadiene	< 100	ug/L	8270	100	BLB	10/14/97	23:47
Hexachloroethane	< 100	ug/L	8270 8270	100	BLB	10/14/97	23:47
Nitrobenzens	< 100	ug/L ug/L	8270 8270	100	BLB	10/14/97	23:47
Partachlorophenol	< 100	ug/L	8270 8270	100	BLB	10/14/97	23:47
Pyndine	< 100	ug/L ug/L	8270 8270	100 100	BLB	10/14/97	23:47
m/p-Cresol	180	ug/L	8270 8270	100	BLB	10/14/97	23:47
o-Cresol	197	ug/L	8270	100	BLB BLB	10/14/97	23:47
	<b>-</b> -,	-b -	0270	100	PLD	10/14/97	23:47
							•
TCLP (1311) HERBICIDES	•			DETECTION	ANALYST	DATE/TIMI	F
ANALYSIS	RESULTS	UNIT	METHOD	UMIT	INITIALS	OF ANALYS	
				114111	IMITALS	OF ANAL 13	212
2,4,5 - TP(Silvex)	< 500	ug/L	8150#	500	PDB	10/17/97	15:15
2,4-C	< 5000	ug/L.	8150#	5000	PDB	10/17/97	15:15
						• • • • • • • • • • • • • • • • • • • •	
TCLP(1311)INORGANICS				DETECTS (No.			
ANALYSIS	NECT IT INC			DETECTION	ANALYST	DATE/TIME	Ε
A14L 1313	RESULTS	UNIT	METHOD	IIMIT	INITIALS	OF ANALYS	SIS
Arsenic	< 0.50		7040	0.50			
Barium	0.59	mg/L	7060	0.50	BAK	10/10/97	13:39
Cadmium	< 0.03	mg/L mg/L	6010 6010	0.30	BAK	10/10/97	13:39
Chromium	< 0.05	mg/L	6010	0.03	BAK	10/10/97	13:39
Load	< 0.20	mg/L	6010	0.05 0.20	BAK	10/10/97	13:39
Mercury	< 0.0005	mg/L	7470	0.0005	BAK	10/10/97	13:39
Selenium	< 0.50	mg/L	6010	0.50	JAB BAK	10/10/97	13:39
Silver	< 0.05	mg/L.	6010	0.05	BAK BAK	10/10/97	13:39
pH,Final		Units	9040	6.03	PDS	10/10/97 10/08/97	13:39 08:00
pH,Initial		Units	9040		PDS	10/05/97	15:14
1.	•				100	10/07/77	13.14

# Labs America

				Quality Env	rronment	al Testing	
TCLP (1311)PESTICIDES				DETECTION	ANALYST	DATE/IIM	Ė
ANALYSIS	RESULTS	UNIT	METHOD		INITIALS	OF ANALY	_
Chiordano	< 10	ug/L	8081	10	PDB	10 (15 )	
Endrin	< 15	ug/L	8081	15	PDB	10/15/97	16:0
Haptachlor	< 4	ug/L	8081	4	PDB	10/15/97	16:0
Heptachior epoxide	< 4	ug/L	8081	4	PDB	10/15/97	16:0
Lindane	< 50	ug/L	8081	50	PDB	10/15/97	16:0
Methoxychler	< 500	ug/L	8081	500	PDB	10/15/97	16:0
Toxaphene	< 250	ug/L	8081	250	PDB	10/15/97	16:0
		-6~	0001	230	פטז	10/15/97	16:0
TCLP (1311) VOLATILES				DETECTION	ANALYST	) - 15 A (195) (198) A:	÷
ANALYSIS	RESULTS	UNIT	METHOD	IIMIT	INITIALS	OF ANALYS	
,1-Dichloroethene	< 50	ug/L	8260	50	BLB	10/11/07	06.1
,2-Dichloroethene	< 50	ug/L	8260	50	BLB	10/11/97	05:3
Benzene	< 50	ug/L	8260	50	BLB	10/11/97	05:3
arbon Tetrachloride	< 50	<b>-</b> g/⊥. ug/L.	8260	50	BLB	10/11/97	05:3
hlorobenzens	< 50	ug/L	8260	50	BLB	10/11/97	05:3
hloroform	< 50	ug/L	8260	50		10/11/97	05:3
fethylethylketone	< 200	ug/L ug/L	8260		BLB	10/11/97	05:3
etrachloroethene	< 50	ug/L ug/L	8260	200	BLB	10/11/97	05:3
richloroethene	< 50	ug/L ug/L	8260 8260	50	BLB	10/11/97	05:3
'inyl Chloride	< 50	ug/L ug/L	8260	50 50	BLB	10/11/97	05:3
Esterification by Standard M.	-	пКЪГ	0400	50	BLB	10/11/97	05:3
OTE: All results, except leach							

Respectfully submitted by:

Karen L Merrill

Laboratory Director

50:39H3

L-977184

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# Labs America

### Quality Environmental Testing

ANA	LYT	ICAL	REPOR'	ľ
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Client:

RESULTS

505 S.Market Street -

Wilmington, DE 19801

Sample ID: Microseparator/Filter Debris/Tank Bottoms

REPORT TO: Mr.Tom Burdeshaw

International Petroleum Corp. of DE

Reported: Received:

10/18/97 10/03/97 L-977184

Work Order: Sampling Date:

09/20/97

Time: BY:

INITIALS OF ANALYSIS

12:20 TB

TCLP (1311) SEMIVOLATI	VES			DETECTION	ANALYST	DATE/TIME	?
ANALYSIS	RESULTS	UNIT	METHOL		INITIALS	OF ANALYS	
1,4-Dichlorobenzens 2,4,5-Trichlorophenol 2,4,5-Trichlorophenol 2,4-Dinltrotoluene Cresol Total Hexachlorobenzene Hexachlorobutadiene Hexachloroethane Nitrobenzens Partachlorophenol Pyndine ni/p-Cresol o-Cresol	< 100 < 100 < 100 < 100 377 < 100 < 100 < 100 < 100 < 100 < 100 < 100 180 197	ug/L ug/L ug/L ug/L ug/L ug/L ug/L ug/L	8270 8270 8270 8270 8270 8270 8270 8270	100 100 100 100 100 100 100 100 100 100	BLB BLB BLB BLB BLB BLB BLB BLB BLB BLB	10/14/97 10/14/97 10/14/97 10/14/97 10/14/97 10/14/97 10/14/97 10/14/97 10/14/97 10/14/97 10/14/97	23:47 23:47 23:47 23:47 23:47 23:47 23:47 23:47 23:47 23:47 23:47 23:47
TCLP (1311) HERBICIDES		-	•	DETECTION	ANALYST	DATE/IIME	

2,4,5 – TP(Silvex) 2,4 – C	< 500 < 5000	ug/L ug/L	8150# 8150#	500 5000	PDB PDB	10/17/97 10/17/97	15:15 15:15
TCLP(1311)INORGANICS				DETECTION	ANALYST	DATE/TIM	
ANALYSIS	RESULTS	UNIT	METHOD	IIMIT	INITIALS	OF ANALYS	SIS
Arsenic Barium Cadmium Chromium Lead Mercury Selenium Silver pH,Final	< 0.50 0.59 < 0.03 < 0.05 < 0.20 < 0.0005 < 0.50 < 0.05	mg/L mg/L mg/L mg/L mg/L mg/L mg/L Units	7060 6010 6010 6010 6010 7470 6010 9040	0.50 0.30 0.03 0.05 0.20 0.0005 0.50 0.05	BAK BAK BAK BAK JAB BAK BAK	10/10/97 10/10/97 10/10/97 10/10/97 10/10/97 10/10/97 10/10/97	13:39 13:39 13:39 13:39 13:39 13:39 13:39
pH,Initial		Units	9040		PDS PDS	10/08/9 <b>7</b> 10/07/97	08:00 15:14

UNIT METHOD

**UMIT** 

**ANALYSIS** 

L-977184

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# Labs America

				Quality Env	rironment	al Testing	
TCLP (1311)PESTICIDES				DETECTION	ANALYST	DATE/TIM	F
ANALYSIS	RESULTS	UNIT	METHOD		INITIALS	OF ANALY	
Chiordano	< 10	ug/L	8081	10	PDB	10/15/97	16:05
Endrin	< 15	ug/L	8081	15	PDB	10/15/97	16:05
Haptachlor	< 4	ug/L	8081	4	PDB	10/15/97	16:05
Heptachlor epoxide	< 4	ug/L	8081	4	PDB	10/15/97	
Lindane	< 50	ug/L	8081	50	PDB	10/15/97	16:05 16:05
Methoxychler	< 500	ug/L	8081	500	PDB		
Toxaphene	< 250	ug/L	8081	<b>25</b> 0	PDB	10/15/97 10/15/9 <b>7</b>	16:05 16:05
						20,20,51	
TCLP (1311) VOLATILES				DETECTION	ANALYST	DATE/TIM	E
ANALYSIS	RESULTS	UNIT	METHOD	UMIT	INITIALS	OF ANALYS	
1,1-Dichloroethene	< 50	ug/L	8260	50	BLB	10/11/97	05:38
1,2-Dichloroethene	< 50	ug/L	8260	50	BLB	10/11/97	05:38
Benzene	< 50	ug/L	8260	50	BLB	10/11/97	05:38
Carbon Tetrachloride	< 50	ug/L	8260	50	BLB	10/11/97	05:38
Chlorobenzens	< 50	ug/L	8260	50	BLB	10/11/97	
Chloroform	< 50	ug/L	<b>82</b> 50	50	BLB		05:38
Methylethylketone	< 200	ug/L	8260	200	BLB	10/11/97	05:38
Tetrachloroethene	< 50	ug/L	8260	50		10/11/97	05:38
Trichloroethene	< 50	ug/L	8260	50 50	BLB	10/11/97	05:38
Vinyl Chloride	< 50	ug/L	8260	50 50	BLB	10/11/97	05:38
# Esterification by Standard M		uge	0200	30	BLB	10/11/97	05:38

Fisterification by Standard Methods 6640

NOTE: All results, except leachate analysis, reported on a dry weight basis.

Respectfully submitted by:

Kared L Merrill
Laboratory Director

TAB: TECHNICAL DATA INFORMATION

Knight Corporation Distributor Binder

# CROSS REFERENCE - FILTRATION APERTURES

MONOFILAMENT MESH	INCHES	MICRONS	MILLIMETERS
10	.0787	3000	2.00
20	.0315	800	.80
30	.0236	600	.60
40	.0157	400	.40
50	,0118	300	.30
60	.0098	250	.250
80	.0082	210	.210
100	.0059	150	.150
125	.0049	125	.125
150	-0039	100	.100
180	.0035	90	.090
200	.0030	75	.075
250	.0025	65	.065
280	.0021	55	.055
300	.0020	50	.050
330	.0016	40	.040
350	.0014	35	.035
400	.0012	30	.030
460	.00079	20	.020
560	.00038	10	.010



### INTERNATIONAL PETROLEUM CORPORATION

June 13, 1995

Browning Ferris Industries Highway 70 Sorrento, La. 70778

Attention: Ms. Mandy Fontenot

RE: International Petroleum Corp. - Waste Disposal Submission Set

Dear Ms. Fontenout (Mandy);

Per request of Bobby Baker of Gauthier Brothers, Inc., I have compiled a complete submission package relative to a proposed series of waste shipments that we would like BFI to consider accepting from International Petroleum Corp.(IPC).

IPC and Gauthier Bros. feels that this waste stream is suitable for acceptance to your facility and we are submitting for your and your company's review the following items:

- \* Hard sample of proposed waste
- \* Special Waste Characterization Data
- \* Generator Process Knowledge Letter
- \* Credit Application For IPC Direct Billing
- \* TCLP Metals Analysis
- \* TCLP Benzene Analysis
- \* Chain of Custody
- \* MSDS for planned or contingent materials to be co-mingled with primary waste.

After reviewing the attached -and assuming you have interest in receiving this waste stream presently and again in the near future- would you be so kind as to quote me your best competitive gate-rate. If you are the successful bidder, we would plan to ship approximately 500-600 tons during July-August.

Please contact me for any additional questions  $\!\!\!\!/$  clarification  $\!\!\!\!\!/$  or qualification.

Thank you for your consideration.

Your very truly,

Richard Lane - President cc: B. Baker



BROWNING-FERRIS INDUSTRIES	BFI WASTE CODE
WASTE APPR	OVAL REQUEST
	OVAL REQUEST
BFI to complete this area.	
BFI Initiator:	Action Requested: □New Waste Approval
Location:	☐ Up-Date Approval - Previous Number:
Company Number.	Disposal Site Requested:
Telephone: ( )	Company Number:
Fax: ( )	Management Method Requested: 🗆 Landfill 🗀 Hauling
Date:	Cother
	CTERIZATION DATA
IMPORTANT: THIS FORM IS TO BE COMPLETED BY A REPRESENTAT INSTRUCTIONS BEFORE COMPLETING THIS FORM. THIS FORM IS T LEGIBLY PRINTED IN INK, AND SIGNED.	IVE OF THE WASTE GENERATOR. PLEASE READ THE O BE USED ONLY ONE TIME, AND MUST BE TYPEWRITTEN OR
1. GENERATO	OR INFORMATION
a) Generator's Name: INGRAPTI WAL PETIS OLEUM	e) State/Provincial/Local Registration No.:
b) Generating Facility's Address: 14890 INTRACASTAL DR	Generator's EPA Id. No.: <u>LAP 092096166</u>
City: NEW ORLEANS State: LA Zip: 75129	Industry Description/SIC Code: 2992
c) Generator's Representative: RICHARD LANGE	
Title: PRESIDENT	f) Customer's Name: SAME
Telephone: (504) 254 - 9930 × 17	g) Customer's Mailing Address:
Fax: (504) <u>254 - 43) G</u>	City:Stare:Zip:
d) Emergency/Information Contact:	h) Representative:
Title:	Telephone: ( )
Telephone: ( )	Fax: ( )
2. GENERAL WASTE	STREAM INFORMATION
Dragon Charles	BOTTALLE MIN NA
a) Name/Description of The Waste: PETROCEUM TAUK	CUTALLICE = 10 BN - AAZ
b) Process Generating Waste: DECANTATION C.	ENTRIFUSE
c) Is this a treatment residue of a waste which was previously a restricted h	·
If yes, describe the waste and the process generating the waste prior to	,
d) Is this a "Hazardous Waste" as defined by State, Provincial, or local Reg	
If yes, enter the Waste Identification Number if one has been assigned:	
e) Is this a "Special Waste", an "Industrial Process Waste", or a "Pollution C	
Yes No If yes, enter Waste Identification Number:	
f) Recommended personal protection equipment and special handling proc	edures:/V C/V2:
g) Anticipated Volume:500 +	□ Cubic Yards ☑ Tons □ Gallons □ Cubic Meters □ Tonnes(metric)
Other Per: □ Year □ Month □ Week □ Day 🗷	
To be transported in: Bulk Drums (type/size)	/
h) Is a representative sample included? ☐ Yes ☐ No	
3. WASTE PR	OPERTIES AT 72°F
a) Physical State:	e) Density Range: 1809 to 2500
☑Solid ☐ Semi-solid	□ N/D □ lbs/gal. □ g./cc.
□ Powder □ Liquid	⊞bs./yd. <sup>3</sup> □Kg/m³ □ Other
☐ Combination	
b) Layerat 🍖	f) Flash Point, 'F:
☑Singte-layered □ Bi-layered □ Multi-layered	□≤72 □73-100 □101-140
c) Colors(s):	□141-200 □≥201 12 N/A □N/D
Describe BROWN / BLACK	
d) Odor	g) pH:
Describe	□ √2 □ 2.1 - 5.0 □ 5.1 - 9.0
☐ None ☑ Mild ☐ Strong	□ 9 1 - 12.4 □ ≥ 12.5 ZN/A □ N/D

### **BEST AVAILABLE COPY**

	/ BFI WASTE CO	/ ·/			
4. REACTIVITY	5. THIS WASTE CONTAINS	6. SPECIAL WASTE COMPOSITION			
Note if the waste exhibits any of the following reactive properties:  Water Reactive Acid Reactive Alkaline Reactive Oxidizer Autopolymerizable Pyrophoric Explosive Thermally Sensitive Shock Sensitive None of the above	Note if the waste contains any of the following: If any are checked "Yes", specify type (if applicable) and include its concentration as part of the waste composition, Section 6.  Free Liquids Section 6.  OSHA Substances Etiological Agents Pathogens Pathogens Pathogens Padioactive Materials Organic Solvents PCBs not regulated by TSCA 40 CFR 761 Virgin Oils None of the Above	Concentration ranges are suggested and units must be identified in percentages (%) and/or parts per million (ppm). Attach additional pages if necessary.  Components  Components  VOL Min. / Max. WEST  INERT  DATER  PETROLEUM  20  12			
		TOTAL 100 100			
	7. TRANSPORTATION INFORMATION	<u> </u>			
If the waste is a DOT Hazardous Ma Proper USDOT Shipping Name: USDOT Hazard Class:  D None MSD Sheets  Other - describe:	UN or NA Number:  8. SUPPLEMENTAL INFORMATION	CERCLA Reportable Quantity:  CERCLA Reportable Quantity:  Waste Composition No. of Pages:			
	9. GENERATOR'S CERTIFICATION				
deliberate or willful omissions of commot a regulated hazardous waste by contain PCBs regulated by TSCA (i.e. GENERATOR'S AUTHORIZED SIG	trached description is complete and accurate to the best aposition or properties exist, that all known or suspected the USEPA, by an applicable State or Provincial authority.  ALCO CFR 761) or any Provincial authority.  NATORY as identified in Section 1 (c):  ALCO LAWE SIGNATURE	st of my knowledge and ability to determine, that no dhazards have been disclosed, and that the waste is			
REPRESENTATIVE SAMPLE CERTIFICATION					
I certify that the sample for which and and preserved in a manner consister	ne person obtaining the sample of the above described alytical data was provided on the waste described above twith accepted technical standards.	waste.  ve is representative of that waste and was collected			
Collector's Name: RICHARD Signature: Deshard Company: INTERNATION Title: PLESIDENT	AL PETROLEUM Generator's Nam Waste Descriptio	ne:			
Telephone Number: 504       254-9030 x 14       Date Collected:					

# GENERATOR PROCESS KNOWLEDGE LETTER

Generator Name: / NTE	ENDITIONAL PETROLEUM	WCD#				
	THOULD WI	place with the second of the second of				
<b>3</b> .	'ROCESS KNOWLEDGE THE cedure)	ANALYSIS THAT IS N	NOT REQUIRED. (TCLP - Toxi			
RCI						
□ TCLP Metals	≥ Reactivity,	Reactivity, & Corrosivity, Agnitability.				
TCLP Semivolatiles	☐ Arsenic, ☐ Barium, ☐ Cadmium, ☐ Chromium, ☐ Lead, ☐ Mercury, ☐ Selenium, ☐ Sik					
a rock Sellivolatiles	o-Cresol, a m-Cresol, a	0-Cresol, & m-Cresol, & p-Cresol, & Cresol (total) & 24-Dinitrorollyana & Christian				
	rexachloropenzene. Thexachloroethane. Thexachlorbutadiene This choose and the control of the con					
TCLP Volatiles	Pentachlorophenol, 2 2,4,5-Trichlorophenol, 2 2,4,6-Trichlorophenol					
2 ICEP volatiles	u denzene, a Carbon Tetrachloride, a Chlorobenzene, a Chloroform, a the thyl Keis					
	1.4-Ulchloropenzene. 21,2	2-Dichloroethane, 🖅 1.1-Di	ichloroethylene. Trichloroethylen			
TOLDIN	.   etrachioroethylene. = Vin	yl Chloride.				
TCLP Herbicides and Pesticides Pe						
Pesticides	Lindane. Methoxychlor.	Toxaphene.				
	not designated a Hazardous Mas		eage and ability to determine, that n or suspect hazards have been FPA per 40 CFR 261.3 or contains			
Print Name: RICHARD LA	91 17 7 9 7 .	P				
Print Name:		tone	Date: 6-12-95			
	Signature:		Date:			
per LAC 33.VII.701.B. (Write	e definition of an industrial waste does not require an industrial w e N/A if the waste stream is an ir	lasia code number en	believe that this waste is not an uired for industrial waste streams			
Print Name: N/A	Signature:		Date:			
Print Name:						
	Signature:					
		AL WASTE URBATE	Date:			
Date of most current $\square$ TCLP or $\square$ process knowledge sub	THIS SECTION FOR INDUSTRIA P analysis I certify that I unders testing and annual up stream must updat	tand the requirements of date requirements for indited annually on	Date:  NLY  LAC 33.VII.711.D.3.d for waste ustrial waste and that this waste			
Date of most current © TCLP or © process knowledge sub	P analysis I certify that I unders testing and annual up stream must updat according to the most	tand the requirements of date requirements for indited annually on	Date:  NLY  LAC 33.VII.711.D.3.d for waste sustrial waste and that this waste file with the disposer (EFI).			
Date of most current $\square$ TCLP or $\square$ process knowledge sub	THIS SECTION FOR INDUSTRIA P analysis I certify that I unders testing and annual up stream must updat	tand the requirements of date requirements for indited annually on	Date:  NLY  LAC 33.VII.711.D.3.d for waste ustrial waste and that this waste			

06/08/95 08:27 🗃 31 :37 7080

SOUTHERN PET LA'

**Ø**002/003



LAFAYETTE AREA LAB 500 AMEASSADOR CAFFERY P SCOTT, LOUISIANA ZIP 70583-8544 PHONE: (318) 237-4775

Certificate of Analysis No. L1-9506117-01

GAUTHIER BROTHERS 305 TURNROW LAFAYETTE, LA 70508 ATTN: J.C. BRIANT

DATE: 06/06/9

PROJECT: GAUTHIER BROTHERS

SITE:

SAMPLED BY: GAUTHIER BROS.

SAMPLE ID: #1

PROJECT NO:

MATRIX: SOLID

DATE SAMPLED: 05/25/95 DATE RECEIVED: 05/26/95

ANALYTICAL DATA PARAMETER RESULTS DETECTION UNIT Silver, TCLP Leachate LIMIT Method 7760 \*\*\* ND 0.01 mg/ Analyzed by: KJ Date: 06/05/95 15:50:00 Arsenic, TCLP Leachate Method 7060 \*\*\* 0.013 0.001 mg/ Analyzed by: GS Date: 06/05/95 12:17:00 Barium, TCLP Leachate Method 7080 \*\*\* 0.6 0.1 mg/I Analyzed by: KJ Date: 06/05/95 13:50:00 Cadmium, TCLP Leachate Method 7130 \*\*\* 0.006 0.005 mg/I Analyzed by: KJ Date: 06/05/95 14:50:00

ND - Not detected.

Notes: \*Ref: Methods for Chemical Analysis of Water and Wastes, 1983, EPA \*\*Ref: Standard Methods for Examination of Water & Wastewater, 18th ed. \*\*\*Ref: Test Methods for Evaluating Solid Waste, El'A SW846, 3rd Ed.

QUALITY ASSURANCE: This analysis was performed in accordance with EPA guidelines for analysis and quality control. Results reported on a Wet Weight Basis unless otherwise noted.

CAG/John Troost/ Laboratory Manager



LAFAYETTE AREA LAB 500 AMBASSAOOR CAFFERY PK SCOTT, LOUISIANA ZIP 70583-8544 PHONE: (318) 237-4775

# Certificate of Analysis No. L1-9506117-01

GAUTHIER BROTHERS 305 TURNROW LAFAYETTE, LA 70508 ATTN: J.C. BRIANT

DATE: 06/06/95

PROJECT: GAUTHIER BROTHERS

SITE:

SAMPLED BY: GAUTHIER BROS.

SAMPLE ID: #1

PROJECT NO:

MATRIX: SOLID

DATE SAMPLED: 05/25/95

DATE RECEIVED: 05/26/95

PARAMETER ANALYTIC	AL DATA		
	RESULTS	DETECTION	UNIT
Chromium, TCLP Leachate Method 7190 *** Analyzed by: KJ Date: 06/05/95 15:20:00	. ND	LIMIT 0.05	mg/
Mercury, TCLP Leachate METHOD 7470 *** Analyzed by: GH Date: 06/05/95 16:00:00	ND	0.0002	mg/L
Lead, TCLP Leachate Method 7420 *** Analyzed by: KJ Date: 06/05/95 14:20:00	0.2	0.1	mg/L
CLP Leachate extraction  Method 1311 ***  Analyzed by: BP  Date: 06/02/95 17:00:00	06/02/95		МА
elenium, TCLP Leachate Method 7740 *** Analyzed by: GS Date: 06/05/95 16:25:00	0.003	0.002	mg/L

ND - Not detected.

Notes: \*Ref: Methods for Chemical Analysis of Water and Wastes, 1983, EPA \*\*Ref: Standard Methods for Examination of Water & Wastewater, 18th ed.

\*\*\*Ref: Test Methods for Evaluating Solid Waste, EPA SW846, 3rd Ed.

QUALITY ASSURANCE: This analysis was performed in accordance with EPA guidelines for analysis and quality control. Results reported on a Wet Weight Basis unless otherwise noted.

CAG/John Troost,/Laboratory Manager



LAFAYETTE AREA LAB 500 AMBASSADOR CAFFERY PK' SCOTT, LOUISIANA ZIP 70583-8544 PHONE: (318) 237-4775

### Certificate of Analysis No. L1-9505A04-01

GAUTHIER BROTHERS 305 TURNROW

LAFAYETTE, LA 70508 ATTN: J.C. BRIANT

INVOICE COPPATE: 06/01/

PROJECT: GAUTHIER BROTHERS

SAMPLED BY: GAUTHIER BROTHERS

SAMPLE ID: #1

PROJECT NO:

MATRIX: SOLID

DATE SAMPLED: 05/25/95

DATE RECEIVED: 05/26/95

ANALYTICAL DATA

PARAMETER RESULTS DETECTION UNIT

LIMIT 36

Hg/

r.

TCLP Benzene Method 1311/8020 \*\*\*

Analyzed by: TB

Date: 05/30/95 11:57:00

Zero Headspace extraction

Method 1311 \*\*\* Analyzed by: BP

Date: 05/26/95 17:00:00

05/26/95

Notes: \*Ref: Methods for Chemical Analysis of Water and Wastes, 1983, EPA \*\*Ref: Standard Methods for Examination of Water & Wastewater, 18th ed

\*\*\*Ref: Test Methods for Evaluating Solid Waste, EPA SW846, 3rd Ed.

QUALITY ASSURANCE: This analysis was performed in accordance with EPA guidelines for analysis and quality control. Results reported on a Wet Weight Basis unless otherwise noted.



## REPORT OF LABORATORY ANALYSIS

Analytical Results - TCLP Volatile Organics by Method 8240 International Petroleum Corporation

Client ID: TANK BOTTOM SLUDGE
Description: SLUDGE
Sample ID: XMQ-001
Matrix: Other

Wet/Dry Basis: NA

Collected: 05/25/95 Received: 05/26/95 Leached & Prepared: 06/01,06/95 Analyzed: 06/06/95 Percent Moisture: NA

· ·		Concentration, ug/l (ppb)							
CAS No.	Parameter	<u>Sample</u>	TCLP Blank	Lab <u>Blank</u>	Detection Limit	Regulatory Level			
71-43-2	Benzene	ND	ND	ИD	50,0	500			

ND-Not Detected at or above the detection limit stated.



# REPORT OF LABORATORY ANALYSIS

Analytical Results - TCLP Volatile Organics by Method 8240 International Petroleum Corporation

t ID: T-110 CETRIFUGE SLUDGE tion: SLUDGE e ID: XFS-001 trix: Other

asis: NA

Collected: 05/09/95 Received: 05/09/95 Leached & Prepared: 05/12,15/95 Analyzed: 05/15/95 Percent Moisture: NA

		Concent	ration. :	ug/l (ppb)	
Parameter	<u>Sample</u>	TCLP <u>Blank</u>	Lab <u>Blank</u>	Detection Limit	Regulatory <u>Level</u>
Benzene	ND	ОИ	ND	50.0	500

d at or above the detection limit stated.



CHAIN-OF-CUSTODY RECORD Analytical Request

Olient Santas Santas Assault Additions	<u> مز ۱۵۱ .</u>	Report To: Mr Dichard Lanc	Pace Client No.
Address		Bill To:	Pace Project Manager
<u>:</u>	•	P.O. # / Billing Reference	Pace Project No.
Phone	· ·	Project Name / No.	*Requested Due Date: 10 days
Sampled By (PRINT):		PRESERVATIVES  ANALYSES  REQUEST  O O O O O O O O O O O O O O O O O O O	DEMARKO.
1 T- 110 (ctrituse Studge 2 T-110 Filter Press Studge 3 4 5 6 7 8	0800 41-15	1 × 1 × 1 × 1 × 1 × 1 × 1 × 1 × 1 × 1 ×	REMARKS  THE PROPERTY OF THE P
COOLER NOS.  BAILERS  Additional Comments	GHIPMENT METHOD OUT / DATE RETURNED /	14 Pin B. R. /Puc / 5/3/5) Phoxa 4.5	AVIAFFILIATION DATE TIME

**z** 5:3 275 5759

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\_ 〒 Stockhausen

Material Safety Data Sheet May be used to comply with OSHA's Hazard Communication Standard. 29 CFR 1910.1200. Standard must be consulted for specific requirements.

### U.S. Department of Labor

(Non-Mandatory Form)

Form Approved OMB No. 1218-0072

Occupational Safety and Health Administration

IDENTITY (As Used on Labor and List)	12.0-072	
Praestol 655K	Note: Elank spaces are not permitted. If any rain is not applicable information is available, the space must be	
Section	information is available, the space must be marked to indic	ಡ, ೦೭ ೧೦ ತತ್ತು ಬಾತ್ತ
Manufacturer's Name		
STOCKHAUSEN, INC.	Emergency Telephone Number	
Accress (Austrion, Street Chy Stam and 710.0	(919) 378-9393	
2408 Doyle St. Greensboro, N.C. 27406	Telephone Number for Information (919) 333-3500	
2,700	Data Prepared (918) 333-3500	
	NA = Not Andirable	,
	Signature of Premier (connect)	<u>م</u>
Section (I trans		
Section II — Hazardous Ingredients/Identity Inform	ation	
fazzroous Components (Specific Chemical Identity: Common Nam	Settal No. U364	
Condition of	e(s)) OSHA PEL ACGIH TLV Recommended H	/0
Copolymer of acrylate salt and	N/2	(aption
acrylamide - Coagulant		majo
CAS No. 69418-26-4	(aya)	
Adipic acid	N/E N/E	
CAS No. 00124-04-9	11/2 N/E 11-am-	<del>din</del> o-
	(270)	
SARA Section 313 Reportable Toxic Chemication III — Physical/Chemical Characteristics	cals - none.	
ng Point		
Solid material	Specific Gravity (H2O - 1)	
or Pressure (mm Hg.)	Bulk Density 600-7	2.0
ess than	Mening Point Bulk Density 600-7	<u>ηη ευ</u>
Certaily (ALR = 1)	Greater than 200°C	
VI I	Craw awi raie	
	(Butyl Acordia = 1)	
iscible (soluble to approximately 2% by	Wt.) - forms work w	
hite granulated	Total very viscous solutions.	
hite granulated solid: faint amine odo	r.	
pon IV — Fire and Explosion Hazard Data		
Point (Method Llead)		
reater than 100°C (PMCC)	Flammazio umre LEL UEL	
Kashing Media	N/F N/	· E-
av available extinguishant media.		<del></del>
one: Soilled product		
The Forang Programs one: Spilled product creates slippery of	conditions in contact with ware	
AN Fire and Fire and Harris		_
пе		
, 		<del></del>

Saction V -					
	- Reactivity Da	ata	21361.0		
Stability	Unstable	1	Conditiona to Avoid		
	Stable			None Known	
		X	-		
Incompatibility	(Materials to Avol	o)			
Hazaroous Deco	emposition or Bypro	xducts		None Known	
Hazaroous	decomposit:	lon:	Oxides of Car	bon $(CO, CO_2)$ , and N	Nitrogen (NO, NO <sub>2</sub> ).
Polym <del>arizaci</del> on		_	Conditions to Avoid	None Known	
	Will Not Occur			tione idiowit	
Section VI -	Health Hazan	d Data			
Poure(s) of Entry:		adation?		Skin?	
learth Hazaros (A	Acusto and Chronic)		Yes	No	Ingestion? Yes
Contact	with the ey	es and	for prolonged.	repeated skin conta	ct may cause irritation.
	particles m	ау сач	se respirator	y irritation	Tritation.
arcinogenicity;	ПИ	P7		WAC Monographs?	
		<del></del>	No	No No	OSHA Regulated?
The and Sympto	on of 5			•	
Reddening	TS OF Exposure	of af	fected area wi	th possible itching	
discomfor	t.		3, 34, 34	com possible itching,	, burning, or other
idical Conditional nerelly Aggravati					
PRELY AGGIZVED	ed by Exposure	Ex:	isting outs, r	ashes, allergies, or	other sensitive areas.
Mancy and Sin	st Aid Procedures	· <del></del>			
Eves and	Skin: Flush	thora	· · · · · · · · · · · · · · · · · · ·		
			JURNIY WITH WA	to- Inhalasian v	
Ingestion	: Tf ill e	ffacto	Degrity with wa	ter, Inhalation: M	love to fresh air.
TUGESTIOU	<u>: If ill e</u>	ffacts	occur, seek	medical attention as	ove to fresh air. with any prolonged discomfor
ction VII — I	: If ill e	ffects or Safe	s occur, seek Handling and Use	medical attention as	with any prolonged discomfor
ingestion ction VII — I made taken in Contain as	: If ill e Precautions fo in Casa Maiariai is nd collect	ffects r Safe Released dry gr	S occur, seek Handling and Use For Solled Tanulate mater	medical attention as	with any prolonged discomfor
ingestion ction VII — I made taken in Contain as	: If ill e Precautions fo in Casa Maiariai is nd collect	ffects r Safe Released dry gr	S occur, seek Handling and Use For Solled Tanulate mater	medical attention as	with any prolonged discomfor
ction VII — I so be Taken a Contain a:  Avoid use with water	If ill e Precautions to in Case Materia is nd collect  of water, to normal	ffects or Safe Released dry gr as sli	Handling and Use or Solled anulate mater ppery conditi	medical attention as in ial using scoop, sho ons will be created.	with any prolonged discomfor vel, or other suitable device Flush residuals thoroughly
ction VII — I so be Taken a Contain a:  Avoid use with water	If ill e Precautions to in Case Materia is nd collect  of water, to normal	ffects or Safe Released dry gr as sli	Handling and Use or Solled anulate mater ppery conditi	medical attention as in ial using scoop, sho ons will be created.	with any prolonged discomfor vel, or other suitable device Flush residuals thoroughly
ingestion ction VII — I as to Be Taken i Contain as Avoid use with water up Disposal Ment Dispose of	If ill e Precautions to In Case Materia is nd collect of water, r to normal	ffects r Safe Released dry gr as sli waste	Handling and Use or Spiled mater anulate mater paery condition water drain.	medical attention as  ial using scoop, sho ons will be created.	with any prolonged discomfor vel, or other suitable device Flush residuals thoroughly
ringestion ction VII — I so to Be Taken i Contain a: Avoid use with water up Discosal Ment Dispose of	If ill e Precautions to in Case Material is nd collect of water, r to normal cool in accord. as non-haza:	ffects or Safe Remassor dry gr as sli waste ance w	Handling and Use or Solid mater drain.  ith local, standid wasterw	medical attention as  ial using scoop, sho ons will be created.	with any prolonged discomfor vel, or other suitable device Flush residuals thoroughly
ringestion ction VII — I as to Be Taken in Contain as Avoid use with water to Discosal Ment Dispose of landfill as autoors to Be Te	Precautions to Precautions to in Case Maleria is not collect of water, reto normal from accordance on accordance of the collect of the collec	ffects or Safe Remassor dry gr as sli waste ance w	Handling and Use or Solid mater drain.  ith local, state solid waste was	medical attention as a simple second	with any prolonged discomfor vel, or other suitable device Flush residuals thoroughly ulations, Incineration or orities.
ringestion ction VII — I as to Be Taken and Contain and Avoid use with water and Dispose of Landfill and Eastern to Be Taken and Le as	If ill e Precautions to In Case Majoria is ind collect of water, r to normal in accord. as non-haza: aken in Handing a an irritant	ffects r Safe Remassor dry gr as sli waste ance w rdous rd Stonk L. Do	Handling and Use or Solled mater chain. ith local, standid waste with not get into	medical attention as in a second seco	with any prolonged discomfor vel, or other suitable device Flush residuals thoroughly
ringestion ction VII — I as to Be Taken and Contain and Avoid use with water and Dispose of Landfill and Ended as Avoid inhar Precautions	If ill e Precautions to In Case Materia is Ind collect Of water, It to normal Income in accord as non-hazas axen in Handing a an irritant	ffects r Safe Released dry gr as sli waste ance w rdous rdous Do dust.	Handling and Use or Spilled mater parry condition water drain.  Ith local, standid waster with mot get into Do not ingest	medical attention as a second state and federal regulate, and federal regulate attention approval of authors. Avoid prolong the second	with any prolonged discomfor vel, or other suitable device Flush residuals thoroughly ulations, Incineration or orities.
ringestion ction VII — I as to Be Taken and Contain and Avoid use with water and Dispose of Landfill and Ended as Avoid inhar Precautions	If ill e Precautions to In Case Materia is Ind collect Of water, It to normal Income in accord as non-hazas axen in Handing a an irritant	ffects r Safe Released dry gr as sli waste ance w rdous rdous Do dust.	Handling and Use or Spilled mater parry condition water drain.  Ith local, standid waster with mot get into Do not ingest	medical attention as a second state and federal regulate, and federal regulate attention approval of authors. Avoid prolong the second	with any prolonged discomfor vel, or other suitable device Flush residuals thoroughly ulations, Incineration or orities.
ringestion ction VII — I as to Be Taken and Contain and Avoid use with water and Dispose of Landfill and Ended as Avoid inhar Precautions	If ill e Precautions to In Case Materia is Ind collect Of water, It to normal Income in accord as non-hazas axen in Handing a an irritant	ffects r Safe Released dry gr as sli waste ance w rdous rdous Do dust.	Handling and Use or Solled mater chain. ith local, standid waste with not get into	medical attention as a second state and federal regulate, and federal regulate attention approval of authors. Avoid prolong the second	with any prolonged discomfor vel, or other suitable device Flush residuals thoroughly ulations, Incineration or orities.
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ingestion ction VII — I so be Taken in Contain as Avoid use with water up Discosal Ment Dispose of landfill a suppose to Be Taken Handle as Avoid inha Precautors Spilled pr	If ill e Precautions to In Case Maieria is Ind collect Of water, In to normal In accord In accor	ffects r Safe Remass dry gr as sli waste ance w rdous rd Stonex t. Do dust. tes sl	Handling and Use or Spilled mater party condition water drain. Ith local, standard wasterwall mot get into Do not ingest inputy conditions.	medical attention as a second	with any prolonged discomfor vel, or other suitable device Flush residuals thoroughly ulations, Incineration or orities.
Avoid use  With water  With wa	If ill e Precautions to Precautions to In Case Materia is Ind collect  of water, In accord  as non-hazas  axen in Handing a  an irritant  clation of o  coduct creat  control Measur  (Specy Type) conditions	ffects r Safe Remass dry gr as sli waste ance w rdous rd Stonex t. Do dust. tes sl	Handling and Use or Spilled mater parry condition water drain. Ith local, standard wasterwall mot get into Do not ingest	medical attention as  ial using scoop, sho ons will be created.  ate, and federal regulith approval of author eyes. Avoid prolong lons.	with any prolonged discomfor yel, or other suitable device Flush residuals thoroughly ulations, Incineration or orities.  ged/repeated skin contact.
Avoid use  With water  With water  With water  With water  With spose of  Landfill a  Successful of the  Avoid inha  Avoid inh	If ill e Precautions to In Case Maiera is Ind collect Of water, In to normal Ind accord as non-hazas axen in Handing a an irritant Illation of o Induct creat Control Measur I (Specy Type) Conditions as Exhaus Recommended	ffects r Safe Released dry gr as sli waste ance w rious rd Stonne L. Do dust. tes sl res (nuisa	Handling and Use or Spiled anulate mater papery conditi water drain. Ith local, standard waster with policy waster waster into Do not ingest ance dust mask	ial using scoop, sho ons will be created.  ate, and federal regulate approval of authors.  eyes. Avoid prolong.  ions.  i). Insure compliance Special	with any prolonged discomforvel, or other suitable device.  Flush residuals thoroughly distions, Incineration or orities.  Ged/repeated skin contact.
Avoid use  With water  With water  With water  With water  With spose of  Landfill a  Successful of the  Avoid inha  Avoid inh	If ill e Precautions to In Case Maiera is Ind collect Of water, In to normal Ind accord as non-hazas axen in Handing a an irritant Illation of o Induct creat Control Measur I (Specy Type) Conditions as Exhaus Recommended	ffects r Safe Released dry gr as sli waste ance w rious rd Stonne L. Do dust. tes sl res (nuisa	Handling and Use or Spilled mater party condition water drain. Ith local, standard wasterwall mot get into Do not ingest inputy conditions.	medical attention as a large state and federal regulate, and federal regulate attention approval of authors.  Avoid prolong to the state of the series of th	with any prolonged discomforvel, or other suitable device.  Flush residuals thoroughly distions, Incineration or orities.  Ged/repeated skin contact.
Avoid use  With water  Ing Discosal Ment Dispose of Landfill a  Subors to Be Taken  Avoid use  With water  Avoid use  With water  Avoid inha  Avoid inha  Procautors  Spilled pr  Handle as  Avoid inha  Cramy Protection  For dusty  About Med	in Case Majora is in Case Majora is in Case Majora is indicated of water, of water, of the normal is in accord. The in accord is non-hazas an irritant is alation of conduct creat conduct creat conduct creat in (Specy Type) conditions as Exhaus Recommended manical (General).	ffects r Safe Released dry gr as sli waste ance w rious rdous to Do dust. tes sl res (nuisa	Handling and Use or Spilled mater party condition water drain. Ith local, standid wastely not get into Do not ingest ippery condition ance dust mask dusty condition water dust mask dusty condition was ance dust mask dusty condition was a c	ial using scoop, sho ons will be created.  ate, and federal regulate approval of authority eyes. Avoid prolong the special spe	with any prolonged discomforvel, or other suitable device.  Flush residuals thoroughly distions, Incineration or orities.  Ged/repeated skin contact.
Avoid use with water up Discosal Ment us Gloves us Discosal Color us Discosal Ment	in Case Majaria is not collect of water, of water, of water, of normal confidence in accordance in accordance in accordance in accordance in accordance in the collect of control Measure in Conduct creat conduct creat in Exhaus Recommended in Recommended in accordance in Control Measure in Conduct in Conduct creat in Exhaus Recommended in Recommended	ffects r Safe Released dry gr as sli waste ance w rdous rdous tous (nuisa for o	Handling and Use or Spilled mater parry condition water drain. Ith local, standid wastel will not get into Do not ingest appery condition ance dust mask dusty conditions.	ial using scoop, sho ons will be created.  ate, and federal regulate attention as attention and federal regulate.  Avoid prolong authors.  Avoid prolong authors.  Insure compliance ons None regulater None regulater Safety	with any prolonged discomfor yel, or other suitable device Flush residuals thoroughly ulations. Incineration or orities.  ged/repeated skin contact.  ged/repeated skin contact.
Avoid use with water and Discosal Ment Dispose of landfill s entors to Be Ta Handle as Avoid inha Precautors Spilled pr Uon VIII — Or Tampy Protection For dusty abon Local	in Case Majaria is not collect of water, of water, of water, of normal confidence in accordance in accordance in accordance in accordance in accordance in the collect of control Measure in Conduct creat conduct creat in Exhaus Recommended in Recommended in accordance in Control Measure in Conduct in Conduct creat in Exhaus Recommended in Recommended	ffects r Safe Released dry gr as sli waste ance w rdous rdous tes sl tes sl for o	Handling and Use or Spiles matter party condition water drain. Ith local, standard waster with local solid waster with local standard waster condition matter drain.  The party condition matter waster waste	ial using scoop, sho ons will be created.  ate, and federal regulate approval of authority eyes. Avoid prolong the special scoop in the	with any prolonged discomfor yel, or other suitable device Flush residuals thoroughly ulations. Incineration or orities.  ged/repeated skin contact.  ged/repeated skin contact.

86/87/23 134 £ 584 638 6376

BI I ASH INC.

U.S. Department of Labor Occupational Salety and Health Administration Melerial Salety Data Shoot Hay be used to pumply with (Non-Mendatory Form) OSIA's Hazard Communication Blandard. Form Approved 27 CFR 1910.1200. Stainfald must be OMB No. 1218-0072 constilled for specific requirements. Hote: Blank spaces are not parmitted, it any arm to not acceptable, or no systemation in available, one space nivit be morked to knock a state DEITHTY (As Used on tichel and Usi) IMACOL VOH CI VOZZ "C" ETA VOH Section 1 Envergency Telephone Humber Manufacturer's Harne (504) 627-4242, 638-6373, UK 1-800-462-2968 DAYOU ASH DIVIGION OF DIGITAVES INVISTRUS Telephone Number for Information Address (Number, Street, City, State, and 717 (Inds) SAME AS ABOVE P.O. IXX 66377 UNO Propered IMION ROKEE, IM 70896 פמפרו ים פשומים Section II -- Hazardous ingredients/Identity Information Chial I finite The proposition ACOM1 TLY Песопитенфеф OSHA PEL Hazardinus Componentis (Specific Chemical Identity; Constion Name(s)) 104 47.5. Info. Not Avail Into. Not Avail (SIOS) STATON DIDXIDE 15.3 10 MUNITION OXIDE  $(\Delta 1, 2O_3)$ 1.2 11 u 10 (Fezuz) THOM OXIDIS 11 24.0 3. CALCUIM OXIDE (400) 10 4.8 ENGNESTUM OXIDE (NaO) . 0.3 11 14/1 <u>(5)</u> SULFUR 10\* 0.6 11 11 INJINGSIUM OXIDE (K<sub>2</sub>O) MITTIGIAMS Per Cubic Mater (My/M3 Claus "C" Fly Ash is not considered a hazardous material under RCRA. (Resource Conservation Recovery Act) In Incl Claus "C" Fly Ash in widely used in controlling Hazardous waste. Section III - Physical/Chamical Characteristics Specific Gravity (1120 = 1) fright bries 2.6176 א/א HATTY POUN ( pt ( ityn) oruses i'l rone ( N/A N/A Francisky Tale  $N/\Lambda$ YANN (Dermity (Alft - 1) N/n (BURY ADMINO + 1) POLLHY VI Walst AND DIM BYHIEFTA Very line colorles: (Lowable granular miterial-12 to 10% notwined on #325 dieve. Section IV - Fire and Explosion Hazard Data UEL LEL Clemenable Limite THE I TYEE (MORTING USED) N/A Loss on Ignition U.Sto2. H/A Enliquishing Modia Epocial Fire Figiraling Procedures N/N Urusual The and Enjacolors Hazards 0811A 114, 5001, 195 ( tapenduce foreity)

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AYOU ASH IHC.

P. 01

Section V - Reactivity Date TOWN DRY MYTERIAL WILL MAT HOLD WEIGHT-EXAMPLY PERSON CAN INCOM ) Ulistathe SININLIT PROXXET MIXED WITH MOISTURE WILL HARDEN IN 1/2 to 2 HOURS. SININO Incompatibility (Haterials to Avold) Hazardous Deconiposition of Dyproducts NONE Conditable to Avuid May Occur MAINIOUS Polymous ico Will Hot Occur Section VI -- Health Harard Data Ingestion7 Inhalancery Dunner) of Entry TREALING OF RESIDENCES SALL ON PARS' LIBRAR OF THE ASSESSMENT DESCRIPTION OF THE MINISTER MINISTER WINTERSON OF THE ASSESSMENT DESCRIPTION OF THE ASSESSMENT DESCRIPTION OF THE ASSESSMENT OF TH Heath Incards (Acide and Civivic) EXIDSURE. DRYNESS OF EKTH OR TRUTTATION OF OPEN SORE OR CUT. USIN Requiried? IANC MOINDIMAR? 14177 Cuttinodatherity (M)  $\mathcal{W}_{\mathcal{I}}$ · FLY ASH IS MAT CARKER CAUSING TO OUR RACHERGE AT THIS TIME. Signic and Symptoms of Lagueuro PYEC, DXY SKIN & DRY NOSE & THRONT Generally Appression by Exposure RESPRINTERY SYSTEM, FINE POINT AND THE THE THE CHENN MATER, SHEW MEDICAL VITENTION IN THRITATION PRESISTS. Section VII -- Preconitions for Sale Handling and Use TANDLING STILLING FLY ASH TOXULBES THE SAME CAUTIONS AS DELICE FLY ASH MINALLY. Signs to Ge Taxon in Case Material Is Apposed or Ballion AVOID COMPACE WITH SKIN & EYES, WELTING WILL DUXXEE ALREOUNE DUST THY ASH MAY HE DISTURDED OF AS A CHARAN SOLID MASTER BY SOLIDIFICATION IN MATERIAL Wasto Disposal Motion IT IS MIT CONSIDERED A HAZARIXAIS WASTE UNDER RORA. AVOID AHRASION OF SKIN, USE APPROVED DUST MASK, STORE IN DRY PLACE AND PLACTICE MORPHI, INDUSTRIAL HYGIFAE OR FIRST AID SIKOLO EXPOSURE OCCUR. WAOLD AVERLIX! IN SLIPFICE LIMI, IS MEL - IL BROOMES AUMA APTEMENTA Section VIII - Control Mensurns PRODUCING DUSTS SISOIMAXMINI TOR HELICAN LONG COLD TOR MILLIANTOSIS Brackel N/Λ Local Exhibust Varildater Other · N/D MUCHANION (DENERN) N/N COCCLES INCOMENDED WHEN SPLASH HAZARD IS I'M CENTROL TON THE GEOMETRY ST STAND OF SHAND THURSTER CREATE, ROBBERT ROOTS, LONG TROUBERS DECEMBED BUT MY RESERVED Other Protective Clothing or Equipment WORNING PIACICOS MORANI. HYCLENE PRIXTICE USUALLY SUPPLCIDAT 1 . UNUFU 1444. C91-319/45775 11/01 2

21 MuH260: 703 11 84: 52519133 TAUTUT CATT: 09/01/94

VAN WATERS & ROGERS 140. MATERIAL SAFETY DATA SHEET

248E: 007

UCES184: 002

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GRIER NO. 151330 **2007 起入1000年** 

- -------- FOR ADDITIONAL INFORMATED -- --

DAT GT. HERS COORDINATOR

WAN WATERS A DUCTED DED.

GRING SUBINES: REPRESENTED TIME CONTROL OF THE

27/9/10/27 PREDUCT: 198391 CLST MO. 100/10 10 10 N 12/4029

VAR NOTTERS A ROSERS INC. A MAMARIN EXPRESSED LIBE (1985) E TITANTO DE C

ATTIES WARRANTIES OF MERCHANTABILITY AND FITNESS THE A PART HOUSE PURIFIE

THE RESPECT TO THE PRODUCT OF INFORMATION PROVIDED BIRTHA WAS INVESTIGATED.

CIRCUSSIANCES SE LIABLE FOR INCIDENTAL OR CONFIGURATIAL DARAGERACIA

ALL IMPORMATION APPEARING HEREIN IS BASED UPON DATA OPTAINED FROM THE NUSACTURER AND/OR RECOGNIZED TECHNICAL SOURCES. WHILE THI INTURNATION IS LIEVED TO SE ACCURATE, VWAR HAKES NO REPRESENTATIONS AS TO ITS ACCURACY OR LÜFFICIEMEY. JONGITIONS OF USE ARE BEYONG VUARS CONTROL AND THEREFORE USERS E RESPONSIBLE TO VERIFY THIS DATA UNDER THEIR OWN OFERATING CONDITIONS TO TERMINE WHETHER THE PROCUCT IS SUITABLE FOR THEIR MARTICULAR PURPOSES AND THEY SSUME ALL RISKS OF THEIR USE, HANDLING, AND DISPOSAL OF THE PRODUCT, OR FROM THE PUBLICATION OR USE OF, OR RELIANCETUPON, INFORMATION CONTAINED MERSIN. IS INFORMATION RELATES ONLY TO THE PRODUCT DESIGNATED HEREIM. AND DOES NOT LATE TO ITS USE IN COMBINATION WITH ANY OTHER MATERIAL OR CHAMY OTHER -ROCESS.

\*\*\* END OF MSDS \*\*\*

500 PORT PURSON 7/2 VAN WATERS & ROGERS INC. PAGE: 003 6**05** NO: 22020437 MATERIAL SAFETY DATA SHEET [FECTORS 7475 09/01/76] VM 116#: 301 2000 - Old Oak Autolo, Kule -DROSER MARK 156522 -2800 bl b 199391 TRAMSPORT INFORMATION 207 (USA) States: rugulated. Oleka 8. pauking gody. II Frager Shighing Name und Member: acetic acid. glacial. UN 278: SMT Papartable\_Fearthty, 7000 16 (2270 k) 786 Thanadal Chatas: Judiched. (11:44 ). Parkint o sub II Proposida popular Kama mis Sumanno acetic acid selectat, By 2000 50 (D::List::|Lisi:: 5) %; (110 18) lin – Jateraatiesa, ligii Alistion Organization (ICAO) ICAC Status regulaces. Iloge B, packing greep II jūre, v. Shlyping Hame und Hember: acetic acid, glocial, IN 2004. ida - Potamasional Marutlas **Congenous Scod**e (1888) IMTI Tobrost regulated. 31 (4) 3 | Pack 1 | 1 | 421 10 | 11 increa Shipping Nume and Mumber: scetic edid, gladial, UN 1750 MEST ANSORRE YESTRAUSER This contrast was been transped in accordance with the MSBS continensations. the Cara Hisard Commun. . Alon Standard 27 CFR 1910,1200. SMA hara: Goes chemical ac. ecetic acid California Proposition 40 (Safe Orinking Water and Toxic Enforcement Action 1986): material(s) kakes to the State to cause cancer: none Dalifornia Proposition 65 (Safe Orinking Water and Toxic Enfortyment Act of 1986): material(s) known to the State to cause adverse reproductive effects: Massachusetts Substance List: acetic acid - New Jersey Workplace Hazardous Substance List: acetic acid Sennsylvania Hazardous Substance Eist: acetic acid his document has been prepared in accordance with the MSOS requirements of the WHMIS Controlled Products Regulation. WHMIS (Canada) Ingredient Disclosure List: acetic acid JHMIS (Canada) Status: controlled WHMIS (Canada) controlled material(s): acetic acid - WHMIS (Canada) Hazard Classification: B/3, E Parcinogenicity Classification (components present at 0.1% or more): f International Agency for Research on Cancer (IARC): not listed - American Conference of Governmental Industrial Hygienists (ACMA): net listed National Toxicalegy Program (NTP): not listed Gorapotical Builty and Health Administration (OSHA); not fight! Chemicaltaifambject to the reporting requirements of Section 310 or Title III of the American Gaendments and Resuthorization Act (SARA) of 1780 and

- SARA (U.S.A.) Bectives 311 and 312 hazard classification(s): fire from a

to CRR Part 372; rese

lamedials county houlth bacard

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REPORT NUMBER: 703
MBBS NO: EXO6043:
                              VAN MATERS & ROGERS INC.
                             FATERIAL SAFETY DATA SHEET
 CALECTIVE DATE: SENCEN
                                                                  $4EREF955 000
 2805UCT: Glacial Accrit Accc
                                                           - ORDER NO: 156307
                                                          PROG NO : 193391
be worn. Respirator type: acid gos. If respirators are used, a program signifi
 be instituted to essure compliance with OSHA Standard 29 CFR 1910.174
 Eye Protection: Wish sefety plannes with side shields (or goggles) and a following
 Mshield. Wear a full-face teapthlist, if needed.
Skin Protection. Wear impervious aloves, boots, and protective clothing
 umpeoprists for the rick of superiors
 Recommended Decontomication Focalities; eye bath, washing facilities, 4:158
 chower
19. PHYSICAL AND CHRHICAL PROPERTIES
 Shysical Harm, liquid
- Color: color:les-
- Odor: pinyanc kinayar
 - Odor Throsin lin C. 47 gem
 - Spacific Station at 20 D (c) Ft (water = 1): 1.95
  Vapor Pressure at 20 C (68 F | 15 C mbar (11.4 mm Hg)
 - Vapor Sensite (Ale = 1), 2...
 Evaporation Rate (n-butyl anguals = 1): 0.97
 - Volatila Fraction by Weight (09 %)
- Boiling Spint, 115 C (239 F.
 Halting Point 17 5 (48 F)
- Viscosif: $1.00 0 (60 F); . .0 mPeus e. cP
- Solubility to Water: dampling
 r pH: 2.4 (at 60 g/1 water)
_{
m C} Octanol/Water Partition Coefficient: log P = -0.31, P = 0.49
 - Flash Point (Tag closed cup) 39 C (103 F)
 - Lower Explosive Limit at 59 1 ((39 F): 6.6 volume %
 - Upper Explosive Limit at 93 0 (199 F): 19.3 volume %
- Autoignition Temperature (ASTH D 2155): 516 C (960 F)
- Sensitivity to Mechanical Impact: not available
- Explosive Power: not available
 - Sensitivity to Static Discharge: Material is unlikely to accumulate a static
  charge which could act as an ignition source.
10. STABILITY AND REACTIVITY
Stability: stable
Incompatibility: Material can react violently with strong oxidizing agents.
Material can react with metals, strong bases, amines.
Hazardous Polymerization: will not occur
 K1. TOXICOLOGICAL INFORMATION
Effects of Exposure:
  Inhalation: Vasor inditation.
  Eyes: Caules severe burns. Waser irritating.
  Skin: Causes severe burni.
  Ingestion: May cause homes of the gastrointestinal tract if swallowed.
Adute Toxidity Gata:
```

Oral L0-50 (rat): 3300-3390 ec/kg

PERDAT NUMBER: 703 HBBS NO: E2940433

WAM WATERS & ROCERS INC.

PASE: 001

MAKERTAL BAFETY BATA SHEET

SFECTIVE DATE: 03/01/94

VERSION: 002

F706UCT: Olicial Acatic Hold

ORDER NO: 156322

PROD NO : 193391

GAUTHIER BROTHERS RENTALS

TRAILER TOWN ROAD

LAKE ARTHUR ,LA 70%

AN WATERS & ROBERS INC. TURBSESTARY D. UNIVER 1206/889-3400 HOO CARILLON POINT ( ) IN FIRELANT

. WA 98033

FOR EMERGENCY ASSISTANCE INVOLUTION DISTRIBLE COLD - CHEMITIC

GOUCT NAME:

Glacial Acatic Acid

§05 ‡: EZ060433

1. CHEMICAL PRODUCT AND COMPANY IDENTIFICATION

roduct Name: Glacial Acetic Acid

Hecular Formula: C2H4O2 Molecular Weight: 30.05 oduct Use: solvent

2. COMPOSITION/INFORMATION ON INGREDIENTS

≟eight % - Component - (CAS Registry No.)

100 acetic acid (000064-19-7)

3. HAZARDS IDENTIFICATION

NGER!

USES SEVERE SKIN AND EYE BURNS

HARMFUL IF SWALLOWED

POR IRRITATING TO THE EYES AND RESPIRATORY TRACT

MBUSTIBLE LIQUID AND VAPOR

HMIS Hazard gatings: Health - 3, Flammability - 2, Chemical Reactivity - 0

VEPA Hazard Patings: Health - 3. Flammability - 2. Chemical Reactivity - 0

TE: HMIS and MEPA ratings involve data and interpretations that may vary

from company to company. They are intended only for rapid, general

identification of the magnitude of the specific hazard. To deal adequately

MAY 24 '95 16:04 VAN WATER & ROGERS LAF.LA.

REPORT NUMBER: 971 HS02 NO: 0125620

WAN WATERS & ROBERS INC. MATERIAL SAFETY BATA SHEET

7AGE: 001

EFFECTIVE DATE: 64/09/93

VERSION: 001

2200UCT: FERRIC SULFATE 36%

Post-It' brand fax transmittal memo 7671 | # of pages > 6

VAN MATERS & RODERS INC. . SUBSIDIARY OF UNIVER (208)889-3400 \$100 CARTELON POINT . KIRKLAND

7 98 98030

ENERGENCY ASSISTANCE -----

FOR EMERGENCY ABBISTANCE INVOLVING CHEMICALD CALL - CHEMIERO (800)424-9366

SECTION I. PRODUCT LOENTIFICATION

देव १६६५ वर्ष केन्द्र पे केन्द्र १ वर्ष १ वर्ष १ वर्ष १ केन्द्र १ वर्ष १

PRODUCT NAME: FERRIC SULFATE 30%

#500 %: P125€29

DATE (SSUED: 04/92

TRACE NAME: Fars

SYMONYMS: Farric sulfate solution

WHISPING MAHE: 000: Compasive liquid, p.8.8.. Compasive detectal (Liquid

Permis Sulfato - 50% matery MA1760

*中国国际海绵等等,*通信,中国的自由的自己的企业,并是一种的特殊的,但是是一种的企业,但是一种的企业,但是一种的企业的企业,但是一种的企业的企业,但是一种的企业,但是

SECTION II. HAZARBOUS INGREDIENTS

· 在第三年前的基础设计,我们就是我们的证明,我们的证明,我们的证明,我们的证明,我们的证明,我们的证明,我们的证明,我们的证明,我们的证明,我们的证明,我们的

MAZIGIAL OR HIMPOMENT - CAS NO. :: 5/U សិន្តិស៊ីនេដ្ឋ មិននិងក្នុង 🔻 10008-23-5 27%

Frau selfunin acid

7664-90-9

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MAY 44 193 15:35 VAN WATER & ROGERS LAFTLA.

REPORT NUMBER: 971

VAN WATERS & ROGERS INC. MATERIAL SAFETY DATA SHEET

PAGE: 002

MS05 M0: P12542V

EFFECTIVE GATE: 04/07/92

VERSIOM: 001

PROMUCE: FERRIC SULFATE 20%

ORGER NO: PROD HO :

Water (belance of furmulation)

dEALTH HAZARB: Anoduct is taxic onally, is corresive to the eye, and will burn the tkin.

AQUATIO TOXICITY: Ferric solvate is listed as toxic to equatio life. Sategory C. 40 GFR Parts 116-118.

SECTION III. PHYSICAL DOTA

· "你我也没有这些我们,我也就是我的我的我的情况,我们就是我的,我们就是我的我的,我们就是我的我的,我们就是我的我的,我们就是我的我们的,我们就会会会会会会

SOTLEMS POINT, 750 polig: Approx. 313 day F SPECIFIC GRAVITY (H2O = 1); 1.325 to 1.355

WARCH DEMSITY (ATR = 1): NA Z WOLATILES BY WOL.: NA

APPRARAMEE AND DOOR: Red-brown solution. He detectable udon.

FAREZING POINT: Does not freeze at 0 dag F

YAPOR PRESSURE: MA

SOLUBILITY IN H20 % BY UT.: Infinite

EVAFORATION RATE (Sutyl Acetate = 1): Not given

Ph (AS 13): Approx. 1.0 28: (1% SGLM). Approx. 4.8

FLASH POINT (METHOD USED): M.A.

FLAMMASLE LIMITS IN AIR, # BY VOL.: LOWER: N.A.: UPPER: H.A.

EXTINGUISHING HESSA: Product does not been or support flame. If product is prosent in a fire, water, CO2, or dry chemical may be used. Product is highly acidic and if in open container avoid splashing.

OPECIAL FIRE FIGHTING PROCEDURES: So not allow product or water containing product to enter a navigable stream. At temperatures above 600 day C. product decomposes to iron exide and sulfur triexide.

UMUSCAL FIRE & EXPLOSION HAZARD: Nobe known.

MUTGIONTION TEMPERATURE: M.A.

And Care Court C

MAR 24 195 16:05 VAN WATER & ROGERS LAFILA.

REPORT NUMBER: 971

VAN WATERS & ROGERS INC.

PAGE: 000

MSSS NO: P125420

HATERIAL SAFETY SATA SHEET

EFFECTIVE DATE: 04/09/92

VERBION: 001

PROBUCY: FERRIC BULFATE 30%

ORDER NO: PROD NO :

ROUTES OF EXPOSURE:

INMALACIGN:

MAZARO CLASSIFICATION: Mut determined, but expected to be low due to exhantexical against tasts, physical and chamical characteristics.

BASIS FOR CLASSIFICATION: NA

SBURCE: NA

SKIH CONTACT:

HAZSRU CLASSIFICATION: Not a primary skin indicate by FHSA standards: 20519 FOR CLASSIFICATION: Primary dormal indication index = 0.0 for 29 and 72 means.

SQUACE: Laboratory test in occurd with PHSA procedure.

SKIN ACCOMPTION:

HAZARS SLAESIFICATION: Not takic denusity by FHSA standards.

SASTE FOR CLASSIFICATION: Est. denusit 1850 (reboit) = (male) greater than

Z.V 9/4g body usight: (Venale) greater than 2.0 g/kg body usight.

SOURCE: Laboratory test in accord with FMSA procedure.

. EYS CONTACT:

HAZARO CLASSIFICATION: Convesive to the eye by FHSA standards.

BABIS FOR CLASSIFICATION: Eye invitation scores:

SCURCE: Laboratory tests in accord with FMSA procedure

NUBERTION:

MAZANU GLASSIFICATION: Toxic by FRSA clauderds.

8ASIS FOR GLASSIFICATION: Gral LOSG (retornate) = becases 2.5 and 5.0 g/kg oddy weight.

6ody weight. (rots-female) = betuses 2.5 and 5.0 g/kg oddy weight.

8GURDS: Laboratory tests accord with FRSA procedure.

EFFECTS OF OVEREXPOSURE:

ACUTE GVEREXFOSURE: None known except at listed in Saction V above. ORRUNGE GVEREXPOSURE: None known except as listed in Saction V above.

EMERCENCY AND FIRST ASD PROCESURES:

ATEC. (manatistely irrivate with large assents of ustor for at least 13 minutes. Hold eyonide opent during irrivation. Send patient to a postaclass tamodizing.

Skin: Fluid with suter while removing richling and shoes. Scaring to

MA: 24 195 16:06 /AN WATER & ROGERS LAFILA.

ASPORT NUMBER: 971 HESS NO: P125524

VAM WATERS & ROBERS INC. --MATERIAL SAFETY DATA SHEET

2n3E: 004

EFFECTIVE DATE: 04/09/92

VERSION: 001

PROGUCT: FERRIC SULFATE 30%

ORUER NO: PROG NO :

Riush for at least 15 minutes. Call a physician. Unsh clothes before revse.

INHALATION: Remove from area and give applificial respiration if needed and seek medical assistance.

IMPERTION: Theat as a corrective liquid. Frink large quantities of warms of milk to reduce concentration and mentralize acid. So not induce vomiting. Call physician impediately.

· 我们有是我们是我就是我们的,我们就是我们的的,我们就是我们的的,我们们的一个人的,我们的是我们的的,我们就会会的一个人的,我们们的一个人的。

COMPITIONS CONTRIBUTING TO INSTABILITY: Note those.

INCOMENTIFICATIVE Product solution is corresive to mild steel, copper, copper alloys and galvanized steel. May be corrective to points, entagle, and concerned. Assets with lime and other basic materials to form insoluble iron salits.

MAXARCOUN DECOMPOSITION PRODUCTS: None normally. At temperatures above 600 deg C, selfor trioxide may be released.

CONSTITIONS CONTRIBUTING TO HAZARGOUS SOLVMERIZATION: News known.

ode tedenésánáka aku alekkutakutakutáka katakudató egyetűkted katkaktakánákannannak SECTIBN UII. BISPOSOL, SPILL OR LKAK PROCCOUKS a tákutak kikátak kitákakák egyánakaták kitak mandákaták katák katkaktak kiták kitakak manna

AQUATIO TOXICITY (a.s., 95 Mx. TLM): We data is known to be evallable. EPA has rated ferric sulfate in Cakegory C in the Waters Program hazardous supstance hist in 40 CFK Parts 115-118.

WASTE DISPOSAL METHOD: Neutralize with lime, soda ash, or bicarboaste and remove to approved landfill.

STEPS TO SE TAXEN IF MATERIAL IS RELEASED OR SPILLED: Prohibit product from renoing into streams or navigable values. Neutralize and remove to opproved landrill. Wash down spill area with water. Check with waste treatent plant before flushing down large amounts of spilled product.

MESTESSATING CMENTCALS: Line (calcium carbonata, calcium nydroxido, deictum oxide), soda can or sodium sicurbonata.

ARBERT DER BETTEN VIII. SPECIAL PROTECTION INFORMATION

ARBERT DE VIII. SPECIAL PROTECTION INFORMATION

ARBERT DE VIII. SPECIAL PROTECTION INFORMATION

ARBERT DE VIII DE VIII

MAY 24 15:36 VAN WATER & ROGERS LAF.LA.

REPORT NUMBER: 971

HB05 HG: P125629

VAN WATERS & ROGERS INC. HATERIAL SAFETY DATA SMEEY

PAGE: 005

EFFECTIVE DAYE: 04/09/92

VERSION: 001

PRODUCT: FERRIC SULFATE NOW

ORDER NO: PROG NO :

VENTILATION REQUIREMENTS: No special ventilation is believed to be necessary under normal use conditions.

SPECIFIC PERSONAL PROTECTION EQUIPMENT:

RESPIRATORY: Note known necessary under normal uso. If mists accur, or may occur, uso a respiratory having an activated carbon filter suitable for sulfuric acid mists.

EVE: Chemical sobular should be worn when handling this product as it is corrosive to the eye.

SLOVES: Chemical or rubber gloves should be work.

OTHER CLOTHING AND EQUIPMENT: Acid resistant elething is recommended. Selety shows are recommended when handling product in drams.

PRECAUTIONARY STATEMENTS: Product is corrosive to mild steel and containers should bear a corrosive 0.0.1. labol. There should be a substance placerd with UNI760.

OTHER MANULING AND STORAGE REQUIREMENTS: Liquid Ferric sulfate solution is corrosive to mild steel. Storage and equipment materials should include fiberglass, reinforced plastics, rubber, load, type 300 or batter grades of stabless ateal.

AGDITIONAL REGULATORY CONCERNS:

TSCA: Is this product, or all its ingredients, being certified for inclusion on the Taxic Substances Control Act inventory of chamical substances? Yes.

OTHER: The Ferric Sulfate weets the ANNA standard for Ferric Sulfate in petbole water. Standard ANNA 8406-87.

OSHA: Product is a natardous material as defined by 29 CFR Paragraph 1910. 1200 becames it is corresive to the eye.

Anodest is not listed by the National Texicalogy Program, the International Assumb for Research on Cancer, nor the Registry of Texic Effects of Chemical Substances (1981-82) as a carcinggen or petential carearoger.

Cana Taris 177: Product contains the following tisted toxic chemicals

MAY 24 '95 16:07 VAN HATER & ROGERS LAFILA.

REPORT NUMBER: 971

MSDS NO: P12562V

YAN WATERS & ROGERS INC. HATERIAL SAFETY DATA SHEET

FAUE: 006

EFFECTIVE DATE: 04/09/72

VERSION: COL

PRODUCT: FERRIC SULFATE 30%

ORDER NO: PROD NO :

which are subject to the reporting requirements of Section 313 of Title III of the Superfund Amendments and Rosethorization Act of 1986 (SARA FITLS III) and 40 CFR, Part 372.

LISTED TOXIC CHEMICAL: Sulfuric acid

CAS#: 7664-93-9

MAX. X SY WOT: 0.5

FOR ADDITIONAL INFORMATION -----

CONTACT: MEDS COORDINATOR

VAN WATERS & ROCERS INC.

DURING BUSINESS HOURS, PACEFIC FIME (204)689-3400

05/04/95 13:53 PRODUCT:

CUST NO:

- ยสัติยิล พอ

HA MAN MATERS & ROBERS INC. ("MWAR") EXPRESSLY DISCLAIMS ALL EXPRESS DR

INSCIES UARRANTIES OF MERCHANTABILITY AND FITHESS FOR A SARTICULAR SURMOSE.

WITH RESPECY TO THE PRODUCT OR INFORMATION PROVIDED HEREIM, AND SHALL UNDER

NO CIRCUMSTANCES BE LIABLE FOR INCIDENTAL OR CONSEQUENTIAL DAMAGES.\*\*

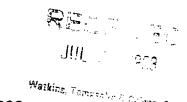
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\*\*\* END OF MSDS \*\*\*

## - Professional Resource Management

### **PRM**

Allen R. Forester David F. Strahorn



July 10, 1998

Mr. Rip Caleen Watkins, Tomasello, & Caleen 1315 East Lafayette Street Suite B Tallahassee, FL 32301

Dear Mr. Caleen:

Confirming our discussions, I am quite confident that IPC properly characterized its Used Oit tank bottoms as non-hazardous before shipment off-site for disposal in a landfill. There is no information that suggests that this material would have failed the TOLP criteria.

i have been active in the Used Oil recycling industry since 1980. I am a State of Cairfornia Registered Environmental Assessor (No. 220). Over the years, I have reviewed a huge amount of data from Used Oil recyclers across the country, both EP TOX and TCLP, and know of no example of a Used Oil tank bottoms sample ever failing. This material and similar solid wastes from Used Oil recyclers are routinely disposed of in non-hazardous landfills across the country.

I have reviewed the relevant information at the following recyclers:

DeMenno/Kerdoon California
Research Oil Ohio
Consolidated Recycling Indiana
IPC of Delaware
IPC of Louisiana Louisiana

All available information supports IPC's determination that the waste in question was non-hazardous.

i am attaching some TCLP data from the IPC facilities that are representative of this waste stream and would not be expected to be significantly different from the majorist in Florida

The first two pages are from Labs America and represent a major cleanout of the large Used Oil tanks at the IPC of Delaware facility in 1997. Although this

sample contained some filter debris from Used Oil and centrifuged DAF solids from wastewater treatment, the vast percentage, 90+, was tank bottoms.

The next page is from Pace Labs and it is a TCLP for benzene only on the solids removed from the Used Oil tanks at IPC Louisiana in 1995. The next three pages are TCLP on the same sample at a different lab, SPL.

The last page is a summary of TCLP results at IPC for their filter solids from Used Oil over five years. This is not exactly the same waste stream although it is derived from the same Used Oil prior to it going into the tank where more solids settled over time. This filter solids stream was deoiled with a petroleum fuel to recover the maximum salable oil and minimize waste. The tank bottoms that are generated infrequently but at a much higher rate, are not deoiled. These results do however indicate that there is not something inherently different or worse about the Used Oil processed by IPC in Florida.

I can provide a large quantity of TCLP data for waste similar to IPC's from DeMenno/Kerdoon, the largest Used Oil recycler west of the Mississippi. This will take two to three weeks since I am going to be on the road. I can be reached at 1 (800) 489-2306 X600.

Sincerely,

David Strahorn

### Attachments

cc Mr. Jerrold Blair

Mr. Garry Allen

# Labs America

### Quality Environmental Testing

witessitussyis

### ANALYTICAL REPORT

Client: International Petroleum Corp. of DE

505 S.Market Street

Wilmington, DE 19801

Sample ID :

Microsuparator/Filter Debris/Tank Bottoms

REPORT TO:

Mr.Tom Burdeshaw

Reported:

10/18/97

Received:

10/03/97

FraE.Jz

Work Order: Sampling Date: L-977184 09/20/97

Time:

12:20

•					1 mie		
•					BY	TE	3
TCLP (1311) SEMIVOLATIVE	S			DETECTION	ANALYST	DATE/TIME	
ANALYSIS	RESULTS	UNIT	METHOD	IIMIT	INITIALS	OF ANALYSIS	;
1,4-Dichlorobenzens 2.4,5-Trichlorophenol 2,4,6-Trichlorophenol 2,4-Oinltrotoluene Cresol Total Hexachlorobenzene Hexachlorobenzene Hexachloroethane Nitrobenzens Partachlorophenoi Pyndine m/p-Cresol o-Cresol	< 100 < 100 < 100 < 100 377 < 100 < 100 < 100 < 100 < 100 < 100 < 100 180 197	ug/L ug/L ug/L ug/L ug/L ug/L ug/L ug/L	8270 8270 8270 8270 8270 8270 8270 8270	100 100 100 100 100 100 100 100 100 100	BLB BLB BLB BLB BLB BLB BLB BLB BLB	10/14/97 10/14/97 10/14/97 10/14/97 10/14/97 10/14/97 10/14/97 10/14/97 10/14/97 10/14/97 10/14/97 10/14/97 10/14/97	3:47 3:47 3:47 3:47 3:47 3:47 3:47 3:47
TCLP (1311) HERBICIDES ANALYSIS	RESULTS	UNIT	METHOD	DETECTION	ANALYST INITIALS	DATE/TIME OF ANALYSIS	
2,4,5-TP(Silvex) 2,4-C	< 500 < 5000	ug/L ug/L	8150# 8150#	500 5000	POB PDB	10/17/97 10/17/97	5:15 5:15
TCLP(1311)[NORGANICS				DETECTION	ANALYST	DATE/TIME	
ANALYSIS	RESULTS	UNIT	METHOD	IIMIT	INITIALS	OF ANALYSIS	
Arsenic Barium Cadmium Chromium Lead Mercury Selenium Silver pH.Final pH.Initial	< 0.50 0.59 < 0.03 < 0.05 < 0.20 < 0.0005 < 0.50 < 0.05	mg/L mg/L mg/L mg/L mg/L mg/L mg/L Units	7060 6010 6010 6010 6010 7470 6010 9040 9040	0.50 0.30 0.03 0.05 0.20 0.0005 0.50 0.05	BAK BAK BAK BAK JAB BAK PDS PDS	10/10/97 10/10/97 10/10/97 10/10/97 10/10/97 10/10/97 10/10/97 10/10/97 10/08/97	3:39 3:39 3:39 3:39 3:39 3:39 3:39 8:00 5:14

L-977184

Page-2

# Labs America

				Quality Enviro	nmental Te	sting	
TCLP (1311)PESTÍCIDES				DETECTION	ANALYST	DATE/TIME	
ANALYSIS	RESULTS	UNIT	METHOD	IIMIT	INITIALS	OF ANALYSI	
Chiordano	< 10	ug/L	8081	10	PDB	10/15/97	6:05
Endrin	· < 15	ug/L	8081	15	PDB	10/15/97	6:05
Heptachlor	< 4	ug/L	8081	4	PDB	10/15/97	
Heptachlor epoxide	< 4	ug/L	8081	4	PDB	10/15/97	6:05
Lindane	< 50	ug/L	8081	50	PDB	10/15/97	6:05
Methoxychler	< 500	ug/L	8081	500	PDB	_	6:05
Toxaphene	< 250	ug/L	8081	250	PDB	10/15/97 10/15/97	6:05 6:05
TCLP (1311) VOLATILES		-		DÉTÉCTION	ANALYOT	<b>-</b>	
ANALYSIS	RESULTS	UNIT	METHOD	IMIT	ANALYST INITIALS	DATE/TIME OF ANALYSIS	S
1,1-Dichloroethene	< 30	ug/L	8260	50	BLB	10/11/97	5:38
1,2-Dichloroethene	< 50	ug/L	8260	50	BLB	10/11/97	5:38
Benzene	< 50	ug/L	8260	50	BLB	10/11/97	5:38
Carbon Tetrachloride	< 50	ug/L	8260	50	BLB	10/11/97	5:38
Chlorobenzens	< 50	ug/L	8260	50	BLB	10/11/97	
Chloroform	< 50	ug/L	8260	50	BLB	10/11/97	5:38
Methylethylketone	< 200	ug/L	8260	200	BLB	10/11/97	5:38
Tetrachloroethene	< 50	ug/L	8260	50	BLB	10/11/97	5:38
Trichloroethene	< 50	ug/L	8260	50	BLB	-	5:38
Vinyl Chloride	< 50	ug/L	8260	50	BLB	10/11/97	5:38
# Esterification by Standard Meth	ods 6640	<del></del>	****	30	DLD	10/11/97	5:38

NOTE. All results, except leachate analysis, reported on a dry weight basis.

Respectfully submitted by:

Karen L Merrill Luboratory Director



# REPORT OF LABORATORY ANALYSIS

Analytical Results - TCLP Volatile Organics by Method 8240 International Petroleum Corporation

Client ID: TANK BOTTOM SLUDGE
Description: SLUDGE
Sample ID: XMQ-001
Matrix: Other Wet/Dry Basis: NA

Collected: 05/25/95 Received: 05/26/95 Leached & Prepared: 06/01,05/95 Analyzed: 06/06/95

Percent Moisture: NA

		Concentration. ug/l (ppb)							
CAS No.	Parametar	<u>Sample</u>	TCLP Blank	Lab Blank	Detection <u>Limit</u>	RegulatoryLevel			
71-43-2	Benzene	ND	MD	ИD	50.0	500			

Detected at or above the detection limit stated.

101

161 James Crive West, Suile 100 St. Rose, LA 70087 TEL: 504-469-0222 FAX: 504-469-0555

An Equal Opportunity Employer



LAFAYETTE AREA LAB SCO AMBASSADOR CAFFERY PRYV SCOTT, LOUISIANA ZIP 70583-3544 PHONE: (318) 237-4775

# Certificate of Analysis No. L1-9506117-01

GAUTHIER BROTHERS 305 TURNROW LAFAYETTE, LA 70508 ATTN: J.C. BRIANT

DATE: 06/06/95

PROJECT: GAUTHIER BROTHERS

SITE:

SAMPLED BY: GAUTHIER BROS.

MATRIX: SOLID DATE SAMPLED: 05/25/95 DATE RECEIVED: 05/26/95

PROJECT NO:

SAMPLE ID: #1

ANALYTICAL DATA PARAMETER RESULTS DETECTION UNITS Silver, TCLP Leachate LIMIT Method 7760 \*\*\* ND 0.01 mg/L Analyzed by: KJ Date: 06/05/95 15:50:00 Arsenic, TCLP Leachate Method 7060 \*\*\* 0.013 0.001 mg/L Analyzed by: GS Date: 06/05/95 12:17:00 Barium, TCLP Leachate Method 7080 \*\*\* 0.6 0.1 mg/L Analyzed by: KJ Date: 06/05/95 13:50:00 Cadmium, TCLP Leachate Method 7130 \*\*\* 0.006 0.005 mg/L Analyzed by: KJ Date: 06/05/95 14:50:00

ND - Not detected.

Notes: \*Ref: Methods for Chemical Analysis of Water and Wastes, 1983, EPA \*\*Ref: Standard Methods for Examination of Water & Wastewater, 18th ed. \*\*\*Ref: Test Methods for Evaluating Solid Waste, ENA SW846, 3rd Ed.

QUALITY ASSURANCE: This analysis was performed in accordance with EPA guidelines for analysis and quality control. Results reported on a Wet Weight Basis unless otherwise noted.

Laboratory Manager



LAFAYETTE AREA LAB SCO AMBASSADOM CAPFERY PKYN SCOTT. LOUISIANA ZIP 70543-8544 PHONE: (318) 237-4775

# Certificate of Analysis No. L1-9506117-01

GAUTHIER BROTHERS 305 TURNROW LAFAYETTE, LA 70508 ATTN: J.C. BRIANT

DATE: 06/06/95

PROJECT: GAUTHIER BROTHERS

SAMPLED BY: GAUTHIER BROS.

SAMPLE ID: #1

PROJECT NO:

MATRIX: SOLID

DATE SAMPLED: 05/25/95

DATE RECEIVED: 05/26/95

PARAMETER	ANALYTICAL	DATA		
		RESULTS	DETECTION	UNITS
Chromium, TCLP Leachat	e	•	LIMIT	41719
method 7190 ***		ИD	0.05	mg/L
Analyzed by: KJ				
Date: 06/05/95	15:20:00			
Mercury, TCLP Leachate				
METHOD 7470 ***		ND	0.0002	mg/L
Analyzed by: GH				
Date: 06/05/95	16:00:00			
Lead, TCLP Leachate				
Method 7420 ***		0.2	0.1	mg/L
Analyzed by: KJ				•
Date: 06/05/95	14:20:00			
TCLP Leachate extractio	n			
method 1311 ***		06/02/95		NA
Analyzed by: BP				
Date: 06/02/95	17:00:00			
Selenium, TCLP Leachate				
Method 7740 ***	ŕ	0.003	0.002	mg/L
Analyzed by: Gs				∃ / 🏎
Date: 06/05/95	16:25:00			ř
ND - Not detected.				

Notes: \*Ref: Methods for Chemical Analysis of Water and Wastes, 1983, EPA \*\*Ref: Standard Methods for Examination of Water & Wastewater, 18th ed. \*\*\*Ref: Test Methods for Evaluating Solid Waste, EPA SW846, 3rd Ed.

QUALITY ASSURANCE: This analysis was performed in accordance with EPA guidelines for analysis and quality control. Results reported on a Wet Weight Basis unless otherwise noted.

CAG/John Troost, Laboratory Manager



### Certificate of Analysis No. L1-9505A04-01

GAUTHIER BROTHERS 305 TURNROW LAFAYETTE, LA 70508 ATTN: J.C. BRIANT

INVOICE COPHATE: 06/01/95

PROJECT: GAUTHIER BROTHERS

SITE:

SAMPLED BY: GAUTHIER BROTHERS

SAMPLE ID: #1

PROJECT NO:

MATRIX: SOLID

DATE SAMPLED: 05/25/95

DATE RECEIVED: 05/26/95

PARAMETER	ANALYTICAL DA	TA RESULTS	DETECTION	UNITS
TCLP Benzene Method 1311/8020 ***		36	LIMIT 1	μg/L

Analyzed by: TB

Date: 05/30/95 11:57:00

Zero Headspace extraction

Method 1311 \*\*\*
Analyzed by: BP

Date: 05/26/95 17:00:00

05/26/95

na

Notes: \*Ref: Methods for Chemical Analysis of Water and Wastes, 1983, EPA \*\*Ref: Standard Methods for Examination of Water & Wastewater, 18th ed. \*\*\*Ref: Test Methods for Evaluating Solid Waste, EPA SW846, 3rd Ed.

QUALITY ASSURANCE: This analysis was performed in accordance with EPA guidelines for analysis and quality control. Results reported on a Wet Weight Basis unless otherwise noted.

CAG/John Troost, Laboratory Manager

Table 1: Summary of TCLP Analyses
June 1993 through November 1997

					Cont	entration (	(mg/l)				
Compound	Sampled	Sampled	Sampled	FDEP	Sampled	Sampled	Sampled	Sampled	Sampled	Sampled	TCLP *
Compound	06/28/93	07/27/93	08/30/93	Split	09/27/93	10/28/93	**************************************	11/20/95	10/17/96	11/5/97	Criteria
	331 B. S.										
Arsenic	0.003	0,009	0.004	BDI,	BDL	0.003	BDL	0.003	BDL	0.004	5,0
Barium	0.72	3.77	BDL	0.5	1.02	0.31	0.55	0.22	6.33	0.5	100
Cadmium	0.002	BDL	BDL	BDL	0.04	0.02	BDL	BDL	0.002	0.09	1.0
Chromium	0.003	0.30	BDL	BDL	0.04	0.04	BDL	BDL	BDL	BDL	5.0
Lead	0.071	0.14	0.09	BDL	0.14	0,15	0.20	0,14		0.16	5,0
Mercury	BDL	BDL	BDL	BDL	BDL	0.0002	0.001	0.0005	BDL	BDL	0.2
Selenium	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	1.0
Silver	BDL	BDL	BDL	BDL	BDL	BDL	0.09	BDL	BDL	BDL	5.0
Benzene	0.005	0,003	0.007	0.010	BDL	0.0011	BDL	0.00085		0.00063	0.5
Carbon Tetrachloride	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	0.5
Chlorobenzene	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	100
Chloroform	BDL	BDL	BDL	BDL	BDL	0.008	BDL	BDL	BDL	BDL	6.0
1,2-Dichloroethane	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	0.5
1,1-Dichloroethylene	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	0.7
Hexachloroethane	BDL	BDL	BDL	NR	BDL	BDL	BDL.	BDL	BDL	BDL	3.0
Methyl Ethyl Ketone	BDL	BDL	BDL	NR	BDL	0.034	BDL	0.00758	BDL	0.123	200
Tetrachloroethylene	0.002	0,002	0,005	0.007	0.003	BDL	BDL	0,00129	BDL	BDL	0,7
Trichloroethylene	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	0.5
Vinyl Chloride	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	0.2
o-Cresol	0.041	0.016	BDL	NR	BDL	0.001	BDL	0.00244	BDL	BDL	200
m-Cresol	BDL	BDL	BDL	NR	BDL	BDL	BDL	BDL	BDL	BDL	200
p-Cresol	0.018	0.004	BDL	NR	BDL	0.006	BDL	0.00135	BDL	BDL	200
1,4-Dichlorobenzene	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	7.5
2,4-Dinitrotoluene	BDL	BDL	BDL	NR	BDL	BDL	BDL	BDL	BDL	BDL	0.13
Hexachlorobenzene	BDL	BDL	BDL	NR NR	BDL.	BDL	BDL	BDL	BDL	BDL	0.13
Hexachlorbutadiene	BDL	BDL	BDL	NR	BDL	BDL	BDL	BDL	BDL	BDL	0.5
Nitrobenzene	BDL	BDL	BDL	NR	BDL	BDL	BDL	BDL	BDL	BDL	2.0
Pentachlorophenol	BDL	BDL,	BDL	NR	BDL	0.042	BDL	BDL	BDL	BDL	100
Pyridine	BDL.	BDL	BDL	NR	BDL	BDL	BDL	BDL	BDL	BDL	5,0
2,4,5-Trichlorophenol	BDL	BDL	BDL	NR	BDL	BDL	BDL	BDL	BDL	BDL	400
2,4,6-Trichlorophenol	BDL	BDL	BDL	NR	BDL	BDL	BDL	BDL	BDL	BDL	2.0

(BDL) Below Laboratory Detection Limits (NR) Not Reported by FDEP (\*) Maximum concentration for non-hazardous

Project 9277 12/2/97

### - Professional Resource Management

### PRM

Allen R. Forester David F. Strahorn

July 30, 1998

Mr. Rip Caleen Watkins, Tomasello, & Caleen 1315 East Lafayette Street Suite B Tallahassee, FL 32301

Dear Mr. Caleen:

Pursuant to your request, I am attaching some typical examples of Used Oil tank bottoms from DeMenno/Kerdoon, the largest Used Oil recycler west of the Mississippi.

The first attachment is a complete TCLP from a Used Oil tank clean out in 1993.

The second attachment includes five TCLP metals tests on Used Oil tank bottoms from 1995. Also included are total lead analysis for these samples. Please note that even when the total lead was 1337 PPM the TCLP was only 1.05 PPM. This is typical of the Used Oil tank bottoms matrix.

The third attachment includes analysis of tank bottoms from four Used Oil tanks in 1996. These analysis are labeled TTLC and STLC. TTLC is a California regulatory designation for total metals whereas STLC is soluble metals. The STLC test is identical to TCLP except citric acid is used in place of acetic acid because metal citrates are more soluble in water than metal acetates. STLC yields consistently higher results than TCLP which is why California requires it.

Used Oil tank bottoms never fail TCLP.

Sincerely

David Strahorn

Attachment

cc Mr. Jerrold Blair

Mr. Garry Allen

# Attachment I 1993 TCLP on Used Oil Tank Bottoms Generated by DeMenno/Kerdoon

### Analytical & Environmental Services

Client: Demenno Kerdoon

Report Date: March 23, 1993

2000 North Alameda Street Compton, CA 90222

Received Date: March 19, 1993

Attm.: J. A. Budson #237

(310) \$57-7100 PAE (310) 639-2946

Friday 01:30P/JM

Project Mage:

Locations

Project #

Porchase Order #

Collected By: Ollent

### Cortificate of Analysis

tab #5303555 Cifert Sreple 10: left #1 Composite Facting left Collection Cate: 03/17/95 11:00

Encapater	Re	FULL	Units	Mat	hod	HDE.	Analyzed
Soluble Arsenic on TOLP Extract	<b>«</b> (	0.1	mg/l		6010		<b>20</b> / <b>20</b> / <b>20</b>
Soluble Barium on TCLP Sxtract		0.68	mg/1			0.2	93/22/93
Soluble Cadmium on TCLP Extract		0.05	**		6010	0.01	03/22/93
Soluble Chromium on TCLP Sutract		1.2	mg/1		4010	0.05	03/32/93
Soluble Lead on TCLP Extract			<b>=9/1</b>		4310	0.02	01/32/93
Soluble Mercury of TCLP Setract		0.3	<b>39/1</b>		英)10	Q.2	03/22/93
		0.003	<b>mg/1</b>	Ðλ	7470	0.003	03/22/93
Soluble Selenium on TCLP Extract		0.02	<b>mg/l</b>	E71	7741	0.03	03/22/93
soluble Silver on MAP Extract	<b>4</b> (	0.08	<b>ag/1</b>	RPA	6010	0.03	03/22/93
Soluble Chloromethane on TCLP-INE	<b>&lt;</b> !	50	ug/1	<b>573</b>	3240	50	03/22/93
Soluble Vinyl Chibride on TCLP-SHE	< !	10	49/1	EPA	8240	10	05/22/93
Soluble Bromosthane on Tong-run	< :	26	mg/l		824C	25	03/22/93
Soluble Chioroethane on TCLP-INC	< !	<b>5</b> 0	ug/l		8240	50	03/22/93
Soluble Acrolein on TCLF-1882	< :	50	ug/L		8340	50	03/22/93
Soluble Adrylomitrile on TCLP-SHE	<b>«</b> ;	50	ug/1		8240	80	03/22/93
Soluble Acetone on TCLP-EFF	∢ :	250	99/1		8240	250	03/22/93
Soluble Trichlorofluoromethane TCLP-IHE	< :	50	uq/1		8240	50	03/22/93
Soluble 1,1-Dichlornethene on TCLE-RE	<	13	ug/1		8240	13	03/22/93
Soluble Methylene Chloride on TCLP-KEE	1	31	ng/1		9240	25	63/22/93
Soluble Carbon Disulfide on TCLP-REE	< 1	130	ug/1		8240	130	03/22/93
Soluble trans-1,2-Dichleroothene TCLPEM	84	13	ug/1		8240	13	03/23/93
Soluble 1,1-0tchlorosthens on TCLP-182	< 1		Ug/1		8240	13	03/22/93
Soluble 2-Sutanone (MEK) on TCLP-EHR		350	99/1		6240	250	•
soluble cis-1,2-Dichlorosthene TCLS-ZHE	₹ :		uq/I				03/22/93
Soluble Chloroform on TCLP-SEE	3		•		8240	13	03/22/93
Soluble 1,1,1-Trichlorosthans TCLP-ZHE			ug/L		8240	13	03/32/93
Enturing 1 2 himbles sections and a section		120	ug/1	•••	8240	13	03/22/93
Soluble 1,2-bichlomoethane on TCLP-ERE	< ;	[]	<b>ug/</b> 1	EPA	8240	13	03/22/93

# Analytical & Environmental Services

client: Demenno Kardood

Project Mame:

Location:

Project # Collected By: Client

Perchase Order #

Report Date: March 23, 1993

Lab PSSISSE Client Semple ID: moil #1 Composite Nutrie: mil Collection Date: 03/17/93 11:00

Parageter	Result	Volta	method	MOL	Analyzed
Soluble Senzone on TCLP-IRS	170	wa/l	EFA 8240	13	03/22/93
soluble Carbon Tetrachloride on TCLP-SE		ug/1	EFA 8240	13	03/22/93
soluble promodici loromethane on TCLP-sa		eg/l	BYA 4240	13	03/22/93
Soluble 1,2 Dichloropropane on TCLP-ZE		ug/1	EFA 5240	13	01/22/93
Soluble Trichlemethene on TCLP-SEE	17	ug/1	EPA 8740	13	03/22/93
soluble 2-Chiprosthyl Vinyl Sther TCLF	-	7/2	KPA 8240	13	03/22/93
Soluble cis-1,3-Dichloropropens TCLP-2		og/1	EPA 8240	13	01/22/93
Soluble 4-Methyl-2-Pentanone on TCLP-E		96/1	EPA 8240	130	03/22/93
soluble trans-1, !-Dichloropropose TCLP!		ug/1	EPR 8240	13	03/22/93
Soluble Toluene on TCLF-EEE	520	vg/1	EPA 8240	13	03/22/93
Soluble 1,1,2-Tr bbloroethane TGLP-SEE	< 13	ug/1	EPA 8240	13	03/23/93
Soluble Dibromonloromethane on TCLP-it	12< 13	ug/l	EPA 6240	13	03/22/93
soloble 2-Hexanore on TCLP-SEE	< 250	ug/1	EPA 8240	250	03/22/93
Soluble Tetranhlorosthese on TCLP-SHR	37	ug/1	BPA 6240	13	03/22/93
Soluble Chlorobensens on TCLP-ZES	< 13	ug/l	294 \$240	13	03/22/93
Soluble Sthylbensene on TCL3-188	180	ug/\	BPN #340	13	03/22/93
Soluble Tylenes on TGLP-TEE	<b>60</b> 0	ug/1	EPA 8240	13	03/32/93
Soluble Brosstore on TCLP-SHE	< 13	ug/l	EFA 8240	23	03/22/93
Soluble Styrene on TCLP-INE	< 13	49/1	EFA 8240	13	03/22/93
Soluble 1, 1, 2, 2-Tetrachlowethane TCLP	XB< 13	uq/l	276 \$340	ນ	03/23/93
Soluble 1,3-Sicriorobenzeme on TCLP-SE		ug/l	EPS 2240	13	03/22/93
\$01uble 1,4.Dintlorobensame on TULP-\$E		ug/l	273 8240	13	03/22/93
Soluble 1,2 Dichlorobensene on TCLP-150	R < 13	ug/l	EPA 8340	<b>3.3</b>	03/22/93
Soluble B-Hitroso-dimethylamine on TCL	P < 2.5	ng/l	EPA \$270	2.5	03/22/93
Soluble Phenol on TCLP Extract	8.3	Ug/1	MPA 8270	5	03/22/93
Soluble 2-Chierophenol on TCLP Extract	< 2.5	ug/1	EPA 6270	1.5	03/22/93
Solubie 1,4 Dichlornhenzene on TGLP Ex-		ug/1	EPA 8270	2	63/33/93
Soluble 1,2-Dichlorobensens on TCLP Ex-	e. 3.1	ug/1	EFA 8270	1	03/22/93
Soluble bis (2-Chloroisspropyl) Sther TC	LP< 3.5	ug/1	EPA 8270	3.5	03/22/93
Soluble Meditiono-Dien-Propylanine TCL		ug/1	EPA 8270	2	03/22/93
Suluble Mitrobenzene on TULP fixtract	< 13	ug/l	EPA 6270	.13	03/22/93
Soluble 2 Mitrophanol on TCLF Extract	< 50	ug/1	EFA 8270	50	03/22/93
Soluble Dis() Chloroethoxy) Nothans TCL	-	ue/l	EPA 8270	7.5	03/22/93
Soluble Benzoic Acid on TCLP Extract	< 50	ug/1	EPA 8270	50	03/22/93
Soluble Reptheline on TCLP Extract	100	49/1	SPA 4270	1	03/33/93
Soluble Bexachiorobutadiene on TCLP Er	t. < 1.5	ug/1	BPA 8270	1.5	03/22/93
Soluble 2-Methy napthalens on TCLP fixt		ug/1	EPA 4270	1.5	03/22/93
Soluble 2, a. 6 frightorophenol on Town	< 25	ug/1	EPA 8270	25	03/22/93

Analytical & Environmental Services

Client: Demenno Kardoom

Project Name:

Location

Purchase Order # Report Date: March 23, 1993

Page 3

Man 26 (95 15:11 40:05 2 15:15 40:05 15:15

Project # Collected By: Client

tab #9303533 Cifant Semple ID: Soil #1 Composite Nathfall Soil Collection Date: 05/17/95 11:00

Parageter	Result	Unite	Met hod	IDL	Inalyzad
Soluble 2-Chloronapthalene on TCLP Bat.	< 1	ug/1	EPA 8270	1	03/22/93
Soluble Dimethyl Phthalate on TCLP fat.	< 1	ug/l	EFA 8270	i	<b>63/22/93</b>
Soluble 7,6-Dinitrotoluene on TCLP Bet.	< 7.5	ug/l	EPA 6270	7.5	03/22/93
Soluble Acquaphthens on TULP Extract	< 1.5	ug/1	EPA 8270	1.5	03/22/93
Soluble 4-Mitrophenol on TCLP Extract	< 25	ug/l	EPA 8270	25	03/22/93
Soluble 2,4-Dimitrotoleens on TCLP Est.	< 8	ug/1	BPA 8270	5	03/32/93
Soluble Fluorene on TCLF SEtract	< 1	49/1	EPA 8270	i	03/22/93
Soluble 4-Mitroapiline on TCLP Extract	< 100	uq/l	EFA 8270	100	03/22/93
Soluble H-Witrocodiphenylamine on Tong	< 1.5	ug/1	EPA 8270	1.8	03/22/93
Soluble 4-Bromophenyl phenylether TCL	× 2.5	ug/l	EDA 8276	2.5	03/22/93
Soluble Sexachlorobeozene on TCLP Ext.	< 2	ug/1	BPA 8270	2	03/22/93
Soluble Pentachlorophenol on TCLP Ext.	< 50	ug/1	EPA 8270	50	03/22/93
Soluble Phenanthrene on TCLP Extract	1.9	ug/1	EPA 6270	1	03/22/93
Soluble Delta-BHC on TCLP Extract .	< 1	ug/1	EPA 8270	1	03/22/93
Soluble Di-E-Buthylphthelate on TCLP Rat	: 20	ug/1	BFA 8270	1	03/22/93
Soluble Septachlor Spoxide on TCLF Ext.	< 5	ug/1	EPA 8270	5	03/22/93
Soluble Pyrene on fCLP Extract	< 1.5	ug/1	EPA 8270	1.5	03/22/93
Soluble 4,4'-002 on TCLP Extract	< 2.8	ug/1	ZPA 8270	2.5	03/22/93
Soluble Endrin on TCLF Extract	< 3	Ug/1	372 8270	3	03/22/93
Soluble 4,4 DDD on TCLP Extract	< 3	ug/1	221 8270	2	03/22/93
Soluble Butylbensylphthalate on TCLE Exe	5.6	ug/1	BPA 8270	1.8	03/22/93
Soluble Endosulfan Sulfate on TCLP Ext	< 18	ug/1	EFA 8270	15	03/23/93
soluble 3,3-highlorobensidine roll bet.	₹ 7.5	vg/1	BPA 8270	7.5	03/22/93
Soluble bis(2-sthyllicay))Phthelate Toll	7 15	uq/1	EPA 8270	8	03/22/93
foluble geneo(b) Fluctranthene on TCLP Ext	< 5	ug/1	39A 5270	Ĭ	03/22/93
Poluble Benzo(a) Pyrans on TCLP Ext	< 5	ug/1	EFA 8270	5	03/22/93
Soluble Dibenzo(8,8)Anthracase on TCLP	< 100	ug/1	TPA \$270	100	03/22/93
Soluble Aniline on TCLF Extract	< 10	ug/1	EFA 6270	10	03/22/93
Soluble bis(2 Chlorosthyi) Sther SCL	<b>×</b> 1	ug/1	BPA 4370	1	03/22/93
Soluble 1,3-Dichlorobenzene on TCLP Brt	< 1	ug/1	NPA 8270	ī	03/22/93
Soluble Senzyl Alcohol on TCLP Extract	< 500	ug/1	EPA 8270	500	03/22/93
Solubly I-Mathylphenol on TCLP Estract	22	ng/1	EPA 8270	20	03/22/93
Soluble 4-Methylphenol on Tong Extract	32	ug/1	ETA 8270	28	03/22/93
Soluble Mexachloroethans on TCLP Extract	< 1.5	ug/1	BYA 9270	1.5	03/22/93
Soluble Isophorone on TOLF Extract	< 1	ug/1	EPA 8270	1	03/22/93
Soluble 2,4 nimer hylphanol on TCLP Ext.	< 50	ug/1	EPA 8270	30	03/22/93
Soluble 2,4-Dichlorsphenol on TCLP Est.	< 25	ua/1	EPA 8270	25	03/22/93
Soluble 1,2,4-Trichlorobenzens on TCLF	< 1	ug/1	EPA 8270	1	03/12/93
	-			•	44144123

Analytical & Environmental Services

Client: Decenno Xerdoom

Froject Mama:

Location:

Froject # Collected By: Client

FAGE 50

Perchase Order #

Report Date: March 23, 1993

tab PF333553 Client Sample ID: Noti #1 Commanite Harrix: Sell Collection Date: 05/17/95 11:00

Parameter	Regult	Dnite	_ Nether	MUL	Analyzed
Soluble 4-chloroaciline on TCLF Extract	< 5	<b>09/1</b>	EFA 8270		03/22/91
Soluble 4 Chloro-3-Mathylphenni on TCLE	< 25	09/1	27A 9270	25	03/22/93
Soluble Maxachlorocyclopentadiane TCL	.P< 50	ug/l	EPA 8270	50	03/22/93
Soluble 1.4,5-Trichlorophenal on TCLP	< 25	99/1	EPA 8276	25	03/32/93
Soluble 2-Mitroselline on TCLP Matract	< 5	ug/l	EPA 8270	5	03/22/93
Soluble Acenaphthylene on TCLP Extract	< 1	ug/1	EPA 8270	i	03/22/93
Soluble 3-Mitroamiline on TCLF Extract	< 25	ug/1	EPA 8270	18	03/28/93
soluble 2,4-Dimitrophenol on TCLF Ext	< 500	ug/1	EPA 8270	500	03/22/93
Soluble Dibenzofuran on TCLP Estract	< 2	ug/1	EPA 8270	2	03/22/93
Soluble Diethylphthelate on TCLF Extrac	E 12	19/1	873 B270	ī	03/22/93
Solubla 4-Chiarophenyl-phenylether TCL	≥< 1.8	<b>eg/1</b>	E9A 8270	1.5	03/22/93
Soluble 4,8-Dimitro-2-Nothylphenol TCL	P< 50	ug/I	EPA 8270	50	03/22/93
Seluble Asobenzena on TCLP Extrect	< 1	ug/l	X7A 8270	1	03/22/93
Soluble Alpha BHC on TCLF Satract	< 25	ug/l	EFA 8270	25	03/22/91
Soluble Bota-MMC on TCXP Extract	< 3	<b>ug/</b> 1	EPA 8270	3	03/22/93
Soluble Gamma-WEC (Lindans) on TCLP Ext	< 3	<b>ug/</b> 1	EPA 8270	3	03/22/93
Soluble Anthracens on TCLP Extract	< 1.8	ug/1	201 4270	1.5	03/22/93
Soluble Heptachlor on TCLP Extract	< 2	ug/1	MPA 5270	2	03/22/93
Soluble Aldrin on TOLF Estract	< 3.5	ug/l	EPA 8270	3.5	03/22/93
Soluble Pluoranthenn on Toll Estract	< 1.5	mg/l	EPA 8270	1.5	03/22/93
Soluble Endosulfan I en TCLP Extract	< 25	ug/1	EPA 6270	25	03/32/93
Soluble Dieldrin on TCLP Extract	< 3.5	ug/1	EPR 8270	3.5	03/22/73
Soluble Endosulfan II on YOLF Extract	< 25	ug/1	NFA 8270	25	03/22/93
Soluble Sndrin Aldebyde on TCLP Extract	< 5	49/1	EFA 8270		03/22/93
Soluble 4.4'-DDT on TCLE Extract	< 2.5	<b>ug/</b> 1	250 8270	2.8	03/23/93
Soluble Senzo(a) Anthracese on This Ext.	< 2	ttg/1	107A 4970	1	03/22/93
Soluble Chrysons on TCLP Extract	< 2	ug/1	EPA 8270	2	03/22/93
Soluble Di-n-Octyl Phthalate on TCLP Ex	t< 7.5	og/1	EPA 6270	7.5	03/22/93
Soluble Senso(k) Fluoranthana on TCLP Ex-	t< I	ug/1	27A 8270	8	03/22/93
Soluble Indeno(1,2,3-cd)Pyrene on ICLP	< 100	ug/1	BJA 8270	100	03/22/93
Soluble Senso(g,h,i) Perylene on TULP Ex	t< 100	ug/l	EPA 8270	100	03/33/93
Soluble Pyriding on TCLF Extract	< 2.5	ug/1	EPA 8270	2.5	• .
	- 617	-41 -	ash early	2.0	03/22/93

## Attachment II

1995 TCLP Metals on Used Oil Tank Bottoms Last page includes total lead for these samples

Generated by DeMenno/Kerdoon

# DeMenno/Kerdoon

# DEMENNO/KERDOON LABORATORY DEPARTMENT TOXICITY CHARACTERISTIC LEACHING PROCEDURE EPA METHOD 1311

### METALS

GENERATOR: DeMenno /Kerdoon

TRANSPORTER: N/A
DATE SAMPLED:06/06/1995
SAMPLED BY: D/K
DATE RECIVED: 06/06/1995

SAMPLE ID: B285-B342

DATE OF EXTRACTION: 10/17/95
DATE OF ANALYSIS: 10/20/95

WASTE TYPE: SOLID

ATTN: DAVE S.

	CAS#	UNITS	DETECTION LIMIT	RESULT	MCL(REG)
Arsenic	7440-38-2	MG/L	0.25	ND	5.0
Barium	7440-39-3	MG/L	0.50	0.50	100.0
Cadmium	7440-43-9	MG/L	0.25	ND	1.0
Chromium	7440-47-3	MG/L	0.50	ND	5.0
Lead	7439-92-1	MG/L	0.50	1.05	5.0
Selenium	7782-49-2	MG/L	0.50	ND	1.0
Silver	7740-22-4	MG/L	0.50	ND	5.0

MCL = Maximum Contaminant Level (Regulatory)

ND = None Detected

UG/L = Microgram per Liter

MG/L = Milligram per Liter

Cypus Pournassanian Laboratory Manager

Faten Attalla Senior Chemist

((CALIFORNIA STATE CERTIFIED))

# DEMENNO/KERDOON LABORATORY DEPARTMENT TOXICITY CHARACTERISTIC LEACHING PROCEDURE EPA METHOD 1311

#### METALS

GENERATOR: DeMenno /Kerdoon

TRANSPORTER: N/A
DATE SAMPLED: 08/23/1995

SAMPLED BY: D/K

DATE RECIVED: 08/23/1995

SAMPLE ID: LAD50823-1

DATE OF EXTRACTION. 10/17/95 DATE OF ANALYSIS: 10/20/95

WASTE TYPE: SOLID

ATTN: DAVE S.

	CAS#	UNITS	DETECTION LIMIT	RESULT	MCL(REG)
Arsenic	7440-38-2	MG/L	0.25	ND	5.0
Barium	7440-39-3	MG/L	0.50	ND	100.0
Cadmium	7440-43-9	MG/L	0.25	ND	1.0
Chromium	7440-47-3	MG/L	0.50	ND	5.0
Lead	7439-92-1	MG/L	0.50	ND	5.0
Selenium	7782-49-2	MG/L	0.50	ND	1.0
Silver	7740-22-4	MG/L	0.50	ND	5.0

MCL = Maximum Contaminant Level (Regulatory)

ND = None Detected

UG/L = Microgram per Liter

MG/L = Milligram per Liter

Cyrus Pourhassanian Laboratory Manager

Faten Attalla Senior Chemist

# DEMENNO/KERDOON LABORATORY DEPARTMENT TOXICITY CHARACTERISTIC LEACHING PROCEDURE EPA METHOD 1311

#### **METALS**

GENERATOR: DeMenno /Kerdoon

TRANSPORTER: N/A
DATE SAMPLED:10/02/1995

SAMPLED BY: D/K

DATE RECIVED: 10/02/1995

SAMPLE ID: LAD51002

DATE OF EXTRACTION: 10/17/95 DATE OF ANALYSIS: 10/20/95

WASTE TYPE: SOLID

ATTN: DAVE S.

	CAS#	UNITS	DETECTION LIMIT	RESULT	MCL(REG)
Arsenic	7440-38-2	MG/L	0.25	ND	5.0
Barium	7440-39-3	MG/L	0.50	ND	100.0
Cadmium	7440-43-9	MG/L	0.25	ND	1.0
Chromium	7440-47-3	MG/L	0.50	ND	5.0
Lead	7439-92-1	MG/L	0.50	ND	5.0 5.0
Selenium	7782-49-2	MG/L	0.50	ND	1.0
Silver	7740-22-4	MG/L	0.50	ND	5.0

MCL = Maximum Contaminant Level (Regulatory)

ND = None Detected

UG/L = Microgram per Liter

MG/L = Milligram pegLiter

Cyrus Pourwassanian Laboratory Manager

Faten Attalla Senior Chemist

# DEMENNO/KERDOON LABORATORY DEPARTMENT TOXICITY CHARACTERISTIC LEACHING PROCEDURE EPA METHOD 1311

#### **METALS**

GENERATOR: DeMenno /Kerdoon

TRANSPORTER: N/A
DATE SAMPLED:10/16/1995

SAMPLED BY: D/K

DATE RECIVED: 10/16/1995

SAMPLE ID: LAD 51016 M#95119134 DATE OF EXTRACTION: 10/17/95 DATE OF ANALYSIS: 10/20/95

WASTE TYPE: SOLID ATTN: DAVE S.

	CAS#	UNITS	DETECTION LIMIT	RESULT	MCL(REG)
Arsenic	7440-38-2	MG/L	0.25	ND	5.0
Barium	7440-39-3	MG/L	0.50	ND	100.0
Cadmium	7440-43-9	MG/L	0.25	ND	1.0
Chromium	7440-47-3	MG/L	0.50	ND	5.0
Lead	7439-92-1	MG/L	0.50	ND	5.0 5.0
Selenium	7782-49-2	MG/L	0.50	ND	1.0
Silver	7740-22-4	MG/L	0.50	ND	5.0

MCL = Maximum Contaminant Level (Regulatory)

ND = None Detected

UG/L = Microgram per Liter

MG/L = Milligram peqLiter

eyrus Pourhassanian Laboratory Manager

Faten Attalla Senior Chemist

# DEMENNO/KERDOON LABORATORY DEPARTMENT TOXICITY CHARACTERISTIC LEACHING PROCEDURE EPA METHOD 1311

#### **METALS**

GENERATOR: DeMenno /Kerdoon

TRANSPORTER: N/A
DATE SAMPLED:10/16/1995

SAMPLED BY: D/K

DATE RECIVED: 10/16/1995

SAMPLE ID: LAD 51016 -1

DATE OF EXTRACTION: 10/17/95
DATE OF ANALYSIS: 10/20/95

WASTE TYPE: SOLID

ATTN: DAVE S.

	CAS#	UNITS	DETECTION LIMIT	RESULT	MCL(REG)
Arsenic	7440-38-2	MG/L	0.25	ND	5.0
Banum	7440-39-3	MG/L	0.50	ND	100.0
Cadmium	7440-43-9	MG/L	0.25	ND	1.0
Chromium	7440-47-3	MG/L	0.50	ND	5.0
Lead	7439-92-1	MG/L	0.50	ND	5.0
Selenium	7782-49-2	MG/L	0.50	ND	1.0
Silver	7740-22-4	MG/L	0.50	ND	5.0

MCL = Maximum Contaminant Level (Regulatory)

ND = None Detected

UG/L = Microgram per Liter

MG/L = Milligram per Liter

Cyrus Pourhassanian Laboratory Manager

Faten Attalla Senior Chemist

### DEMENNO/KERDOON LABORATORY DEPARTMENT

GENERATOR: DeMenno/Kerdoon

TRANSPORTER: N/A
WASTE TYPE: Solid
SUBMITED BY: D/K
ATTN: Dave S.

SAMPLE I.D. NO.: See Below DATE SAMPLED: See Below DATE RECIVED: Various SAMPLED BY: D/K

DATE OF REPORT: 10/24/1995

SAMPLE ID	SAMPLE DATE	ANALYTE	METHOD	UNIT	RESULT	MDL	
B285-342	6/6/95	LEAD	EPA3050	MG/KG	1165	10.0	
LAD 50614-1	6/14/95	LEAD	EPA3050	MG/KG	1028	10.0	
LAD 50823-1	8/23/95	LEAD	EPA3050	MG/KG	1337	10.0	
LAD 51002-1	10/2/95	LEAD	EPA3050	MG/KG	707	10.0	
LAD 51010/M05119134	10/10/95	LEAD	EPA3050	MG/KG	593	10.0	
LAD 51016	10/16/95	LEAD	EPA3050	MG/KG	413	10.0	

CYRUS POURHASSANIAN LABORATORY MANAGER

FATEN ATTALLA SENIOR CHEMIST

### Attachment III

1996 TTLC and STLC on Used Oil Tank Bottoms
TTLC represents total metals
STLC represents soluble maetals

Generated by DeMenno/Kerdoon

#### DEMENNO/KERDOON LABORATORY DEPARTMENT

GENERATOR: DEMENNO/KERDOON

TRANSPORTER: NA

MATRIX: SOIL

SUBMITTED BY:KEVIN STORMS REF#: SOLIDS FROM TK 1007 SAMPLE I.D. NO.: TK 1007 PURE DATE/TIME SAMPLED:6/25/1996 17:40 DATE/TIME RECIVED:6/25/1996 19:00 SAMPLED BY: KEVIN STORMS DATE OF REPORT:07/05/1996

		<i>T</i> 7	LC			STLC		
ANALYTE	MCL	UNITS	MDL	RESULT	MCL	UNITS	MDL	RESULT
As	500.0	Mg/Kg	10.0	ND	5.0	MG/L	1.0	ND
Se	100.0	Mg/Kg	75.0	170.0	1.0	MG/L	0.5	0.9
Pb	1000.0	Mg/Kg	10.0	866.0	5.0	MG/L	1.0	1.8
TI	700.0	Mg/Kg	10.0	84.0	7.0	MG/L	1.0	ND.
Cr	2500.0	Mg/Kg	10.0	181.0	5.0	MG/L	1.0	ND ND
Cu	2500.0	Mg/Kg	10.0	1610.0	25.0	MG/L	1.0	ND
Ni	2000.0	Mg/Kg	10.0	378.0	20.0	MG/L	1.0	ND ND
Cd	100.0	Mg/Kg	10.0	ND	1.0	MG/L	1.0	ND
Ag	500.0	Mg/Kg	10.0	ND	5.0	MG/L	1.0	ND ND
Zn	5000.0	Mg/Kg	10.0	2400.0	250.0	MG/L	1.0	12.7
Ba	10000.0	Mg/Kg	10.0	576.0	100.0	MG/L	1.0	3.5
Hg	20.0	Mg/Kg	0.50	8.5	0.2	MG/L	0.005	ND
Co	8000.0	Mg/Kg	10.0	59.4	80.0	MG/L	1.0	ND ND
Be	75.0	Mg/Kg	10.0	ND	0.75	MG/L	0.5	ND ND
v	2400.0	Mg/Kg	10.0	42.0	24.0	MG/L	1.0	ND ND
Мо	3500.0	Mg/Kg	10.0	77.0	350.0	MG/L	1.0	
Sb	500.0	Mg/Kg	10.0	ND	15.0	MG/L	1.0	ND ND

MCL= MAXIMUM CONTAMINANT LEVEL (REGULATORY)

MDL= MINIMUM DETECTION LIMIT

ND = NONE DETECTED

CYRUS POURHASSANIAN LABORATORY MANAGER

### DEMENNO/KERDOON LABORATORY DEPARTMENT

GENERATOR: DEMENNO/KERDOON

TRANSPORTER: N/A

MATRIX: SOIL

SUBMITTED BY:KEVIN STORMS REF#: SOLIDS FROM TK 1008 SAMPLE I.D. NO.: TK 1008 PURE DATE/TIME SAMPLED:6/25/1996 18:00 DATE/TIME RECIVED:6/25/1996 19:00 SAMPLED BY: KEVIN STORMS DATE OF REPORT:07/05/1996

		T7	LC		STLC			
ANALYTE	MCL	UNITS	MDL	RESULT	MCL	UNITS	MDL	RESULT
As	500.0	Mg/Kg	10.0	ND	5.0	MG/L	1.0	ND
Se	100.0	Mg/Kg	75.0	165.0	1.0	MG/L	0.5	1.9
<i>Pb</i>	1000.0	Mg/Kg	10.0	1220.0	5.0	MG/L	1.0	1.3
<i>TI</i>	700.0	Mg/Kg	10.0	55.8	7.0	MG/L	1.0	1
Cr	2500.0	Mg/Kg	10.0	336.0	5.0	MG/L	1.0	2.9
Cu	2500.0	Mg/Kg	10.0	2260.0	25.0	MG/L	1.0	ND
Ni	2000.0	Mg/Kg	10.0	526.0	20.0	MG/L	1.0	1.6
Cd	100.0	Mg/Kg	10.0	17.7	1.0	MG/L	1.0	ND
Ag	500.0	Mg/Kg	10.0	13.8	5.0	MG/L	1.0	ND
Zn	5000.0	Mg/Kg	10.0	616.0	250.0	MG/L	1.0	33.5
Ba	10000.0	Mg/Kg	10.0	129.0	100.0	MG/L	1.0	11.5
Hg	20.0	Mg/Kg	0.50	1.7	0.2	MG/L	0.005	ND
Co	8000.0	Mg/Kg	10.0	85.0	80.0	MG/L	1.0	ND ND
Be	75.0	Mg/Kg	10.0	ND	0.75	MG/L	0.5	
V	2400.0	Mg/Kg	10.0	49.0	24.0	MG/L	1.0	ND ND
Mo	3500.0	Mg/Kg	10.0	191.0	350.0	MG/L		ND 4.7
Sb	500.0	Mg/Kg	10.0	ND	15.0	MG/L	1.0 1.0	1.7 ND

MCL= MAXIMUM CONTAMINANT LEVEL (REGULATORY)

MDL= MINIMUM DETECTION LIMIT

ND = NONE DETECTED

CYRUS POURHASSANIAN LABORATORY MANAGER

#### DEMENNO/KERDOON LABORATORY DEPARTMENT STLC METALS

GENERATOR: DEMENNO/KERDOON

TRANSPORTER: N/A

MATRIX: SOIL

SUBMITTED BY: KEVIN STORMS

REF#: SOUTHWEST TANK FARM PROJECT

SAMPLE I.D. NO.: TK 2001 SLUDGE DATE SAMPLED: 08/29/1996 DATE RECIVED:08/29/1996

SAMPLED BY: N/A

DATE OF REPORT:09/03/1996

ANALYTE	MCL	UNITS	RESULT	MDL
As	5.0	MG/L	ND	1.0
Se	1.0	MG/L	2.4	0.5
Pb	5.0	MG/L	1.7	1.0
TI	7.0	MG/L	1.4	1.0
Cr	5.0	MG/L	4.1	1.0
Cu	25.0	MG/L	ND	1.0
Ni	20.0	MG/L	3.2	1.0
Cd	1.0	MG/L	ND	1.0
Ag	5.0	MG/L	ND	1.0
Zn	250.0	MG/L	25.0	1.0
Ba	100.0	MG/L	8.7	1.0
Co	80.0	MG/L	ND	1.0
Be	0.75	MG/L	ND	0.5
V	24.0	MG/L	ND	1.0
Мо	350.0	MG/L	ND	1.0
Sb	15.0	MG/L	ND	1.0

MCL= MAXIMUM CONTAMINANT LEVEL (REGULATORY)

MDL= MINIMUM DETECTION LIMIT

ND = NONE DETECTED

CYRUS POURHASSANIAN LABORATORY MANAGER

#### DEMENNO/KERDOON LABORATORY DEPARTMENT TTLC METALS

GENERATOR: DEMENNO/KERDOON

TRANSPORTER: N/A

MATRIX: SOIL

SUBMITTED BY:

REF#: SOUTHWEST TANK FARM PROJECT

SAMPLE I.D. NO.: TK 2001 SLUDGE DATE/TIME SAMPLED:08/29/1996 DATE/TIME RECIVED: 08/29/1996

SAMPLED BY: N/A

DATE OF REPORT:09/03/1996

ANALYTE	MCL	UNITS	RESULT	MDL
As	500.0	Mg/Kg	ND	10.0
Se	100.0	Mg/Kg	120	75.0
Pb	1000.0	Mg/Kg	780	10.0
TI	700.0	Mg/Kg	62	10.0
Cr	2500.0	Mg/Kg	218	10.0
Cu	2500.0	Mg/Kg	1880	10.0
Ni	2000.0	Mg/Kg	210	10.0
Cd	100.0	Mg/Kg	19	10.0
Ag	500.0	Mg/Kg	14	10.0
Zn	5000.0	Mg/Kg	2160	10.0
Ba	10000.0	Mg/Kg	158	10.0
Co	8000.0	Mg/Kg	39	10.0
Be	75.0	Mg/Kg	ND	10.0
V	2400.0	Mg/Kg	22	10.0
Мо	3500.0	Mg/Kg	17	10.0
Sb	500.0	Mg/Kg	ND	10.0

MCL= MAXIMUM CONTAMINANT LEVEL (REGULATORY)

MDL= MINIMUM DETECTION LIMIT

ND = NONE DETECTED

CYRUS POURHASSANIAN LABORATORY MANAGER

#### DEMENNO/KERDOON LABORATORY DEPARTMENT STLC METALS

GENERATOR: DEMENNO/KERDOON

TRANSPORTER: N/A

**MATRIX: SOIL** 

SUBMITTED BY: KEVIN STORMS

SAMPLE I.D. NO.: TK55001,CENTRIFUGE

DATE SAMPLED:07/19/1996

DATE RECEIVED: 07/19/1996

DATE OF REPORT:09/16/1996

SAMPLED BY: PLANT

REF#:TREATABILITY STUDY OF CENTRIFUGE/TANK55001 SOLIDS USING METABOND#2 FROM DIVERSIFIED MATERIAL INC.

4444			TK 55001	TK 55001	CENTRIFUGE	CENTRIFUGE	
ANALYTE	MCL	UNITS		8.5%METABOND		7.5%METABOND	MDL
		<u> </u>	AS IS	#2	AS IS	#2	
As	5.0	MG/L	ND ND	ND	ND	ND	1.0
Se	1.0	MG/L	3.7	3.2	3.2	3.2	0.5
Pb	5.0	MG/L	1.4	ND	ND	ND	1.0
π	7.0	MG/L	1.5	<5.0	3.0	<5.0	1.0
Cr	5.0	MG/L	3.5	2.7	2.6	<2.8	1.0
Cu	25.0	MG/L	ND	ND	ND	ND	1.0
Ni	20.0	MG/L	5.6	2.6	7.7	4.2	1.0
Cd	1.0	MG/L	ND	ND	ND	ND	1.0
Ag	5.0	MG/L	ND	ND	ND	ND	1.0
Zn	250.0	MG/L	20.7	16.0	18.2	18.0	1.0
Ba	100.0	MG/L	12.8	8.7	9.5	6.6	1.0
Hg	0.2	MG/L	ND	**	ND	##	0.05
Co	80.0	MG/L	ND	ND	ND	ND	1.0
Be	0.75	MG/L	ND	ND	ND	ND	1.0
V	24.0	MG/L	ND	<2.0	ND	ND	0.5
Мо	350.0	MG/L	ND	ND	ND	ND	1.0
Sb	15.0	MG/L	ND	ND	ND	ND	1.0
NITIAL pH				11.0		11.4	

MCL= MAXIMUM CONTAMINANT LEVEL (REGULATORY)
MDL= MINIMUM DETECTION LIMIT

ND = NONE DETECTED

\*\* RESULTS TO FOLLOW

CYRUS POURHASSANIAN	GALINA AL EYANDROV

#### DEMENNO/KERDOON LABORATORY DEPARTMENT TTLC METALS

GENERATOR: DEMENNO/KERDOON

TRANSPORTER: N/A

**MATRIX: SOIL** 

SUBMITTED BY: KEVIN STORMS

SAMPLE I.D. NO.: TK55001,CENTRIFUGE

DATE SAMPLED:07/19/1996

**DATE RECEIVED: 07/19/1996** 

SAMPLED BY: PLANT

DATE OF REPORT:09/16/1996

REP# TREATABILITY STUDY OF CENTRIFUGE/TANK55001 SOLIDS USING METABOND#2 FROM DIVERSIFIED MATERIAL INC.

<del></del>	T				· · · · · · · · · · · · · · · · · · ·		
ANALYTE	MCL	UNITS	TK 55001	TK 55001	CENTRIFUGE	CENTRIFUGE 7.5%METABOND	MDL
			AS IS	#2	AS IS	#2	
As	500.0	Mg/Kg	12.4	ND	ND	ND	40.0
				<del></del>		· · · · · · · · · · · · · · · · · · ·	10.0
Se	100.0	Mg/Kg	204.0	165.0	140.0	126.0	75.0
Pb	1000.0	Mg/Kg	998.0	800.0	410.0	348.0	10.0
TI	700.0	Mg/Kg	400.0	428.0	212.0	<525	10.0
Cr	2500.0	Mg/Kg	236.0	208.0	222.0	216.0	10.0
Си	2500.0	Mg/Kg	2340.0	1790.0	960.0	608.0	10.0
Ni	2000.0	Mg/Kg	100.0	<300	108.0	<300	10.0
Cd	100.0	Mg/Kg	18.8	16.0	ND	ND	10.0
Ag	500.0	Mg/Kg	ND	ND	ND	ND	10.0
Zn	5000.0	Mg/Kg	4140.0	2080.0	1450.0	770.0	10.0
Ва	10000.0	Mg/Kg	174.0	<300	216.0	384.0	10.0
Hg	20.0	Mg/Kg	13.4	**	1.3	**	0.50
Со	8000.0	Mg/Kg	46.0	40.0	45.6	42.0	10.0
Be	75.0	Mg/Kg	ND	ND	ND	ND	10.0
V	2400.0	Mg/Kg	43.0	<50	52.8	<100	10.0
Мо	3500.0	Mg/Kg	90.0	20.0	118.0	26.0	10.0
Sb	500.0	Mg/Kg	ND	ND	ND	ND	10.0
рН				11.0		11.4	

MCL= MAXIMUM CONTAMINANT LEVEL (REGULATORY)

MDL= MINIMUM DETECTION LIMIT

ND = NONE DETECTED

\*\* RESULTS TO FOLLOW

CYRUS POURHASSANIAN

GALINA ALEXANDROV

5/29/97

1 of



### Progress Environmental Laboratories

4470 Pendola Point Road Tampa, Florida 33619 (813) 247-2805 FAX: (813) 248-1537

### - CERTIFICATE OF ANALYSIS - (HRS #E84207 and FDER CompQap #900306G)

To: International Oil Service

105 South Alexander Street

Plant City, FL 33566

Attn: Leo Jamros

: 9705-00255-1

PEL Lab # Client ID

: Used Anti-Preeze

Project ID Location

: Daytona Linc/Merc

Matrix

: Liquid

Collection Information: Sample Date: 5/21/97

Sample Time: 10:45 Sampled By : Client

Sample Quality:

Report Date:

Page:

ND = Less than MDL Parameter Method Units Results GC Volatiles **EPA** 8010 Dichlorodifluoromethane **EPA 8010** MD ug/l 4.8 cis-1,2-Dichloroethene **EPA** 8010 ND ug/l2.0 Chloromethane EPA 8010 ND ug/l 7.4 Vinyl Chloride EPA 8010 MD wg/1Bromomethane EPA 8010 ND ug/l 5.1 Chloroethane **BPA 8010** ND ug/l 2.9 Trichlorofluoromethane EPA 8010 ND 3.6 ug/11,1-Dichloroethene EPA 8010 ND ug/l3.6 Methylene Chloride EPA 8010 ND **ug/1** 10.0 Trans-1,2-dichloroethene **5PA 8010** ND ug/l4.2 1,1-Dichloroethane **EPA** 8010 ND ug/l 3.5 Chloroform **EPA** 8010 ND ug/l 10.0 1,1,1-Trichloroethane **EPA 8010** ND ug/1 3.0 Carbontetrachloride EPA 8010 ug/1 ND 3.4 1,2-Dichloroethane EPA 3010 ND ug/14.2 Trichloroethene **EPA** 8010 ND ug/l 3.6 1,2-Dichloropropane EPA 8010 ND ug/1 3.8 Bromodichloromethane EPA 8010 ND ug/1 4.1 2-Chloroethylvinyl ether EPA 8010 ug/113.0 Cis-1,3-Dichloropropene EPA 8010 ND ug/13.8 Trans-1.3-Dichloropropene **EPA 8010** ND ug/1 4.2 2,1,2-Trichlorosthane **EPA 8010** ND ug/l 5.1 Tetrachloroethene **EPA 8010** 891 ug/l 18.0 Dibromochloromethane **EPA 8010** ND ug/14.8 Bromoform EPA 8010 ND ug/18.0 1,1,2,2-Tetrachloroethane EPA 8010 ug/I 8.2 Analysis date EPA 8010 05-27-97

- CONTINUED ON NEXT PAGE -

### - CERTIFICATE OF ANALYSIS - (HRS #E84207 and FDER Compgap #900306G)

To: International Oil Service

Report Date: 5/29/97

105 South Alexander Street

Page: 2 of 2

Plant City, FL 33566

Attn: Leo Jamros

PEL Lab # : 9705-00255-1 (Continued ...)

Client ID : Used Anti-Freeze

Parameter	Method	Results	ND = Less tha Units	m MDL MDL
*1,4Dichlorobutane(10-150%)	EPA 8010	108	ŧR	
*4-BFB (10-150*)	EPA 8010	116	+R	
GC Volatiles	EPA 8020	220	• • • • • • • • • • • • • • • • • • • •	· An
MTBE	EPA 8020	ND	ug/1	6.3
lenzene	EPA 8020	<u> </u>	ug/l	2.5
Moluene	EPA 8020	54.8	ug/1	3.1
hlorobenzene	EPA 8020	ND	ug/1	4.3
Sthylbenzene	BPA 8020	11.2	ug/1	4.3
n,p-Xylene	EPA 8020	47.5	ug/l	4.7
-Xylene	EPA 8020	40.7	ug/1	5.3
.,3-Dichlorobenzene	EPA 8020	ND	ug/1	3.3 3.7
.4-Dichlorobenzene	EPA 8020	ND .		5. <i>7</i> 5.9
,2-Dichlorobenzene	EPA 8020	ND	ug/1	
malysis date	EPA 8020	<del></del>	ug/l	7.0
Fluorobenzene (81-1244)	EPA 8020	05-27-97	10	
Lead	EPA 6010	98.3 196	₹R ug/l	29.2

TOTAL P.04



July 31, 1998

Mr. Gary Allen 105 South Alexander Street Plant City, Florida 33566

Dear Mr. Allen,

SUBJECT: TOTALS VS. TCLP

In regards to your letter dated July 23, 1998, two questions were presented concerning used antifreeze analysis conducted at Progress Environmental Laboratories. Project numbers 9702-00242, 9704-00266 9705-00255, 9707-00095, 9707-00291 were analyzed for total volstiles EPA 8010, 8020 and total lead EPA 6010.

Question 1: Were the samples filtered to determine percent solids as specified in TCLP analysis?

Samples are not filtered for the analysis of total constituents.

Question 2: Please indicate the extent to which the quality control data shown on the laboratory analyses affects the weight to be given the circled "totals" figures, and whether the QC data justifies an adjustment downward?

Progress Environmental Laboratories does not use precision and accuracy "QC data" values to adjust results.

If I can be of further assistance in this matter please contact me.

Sincerely,

Viscent M. Giampa

Laboratory Manager



4420 Pendola Pelni Read Tempa, Florida 33619 (813) 247-2805 FAX: (813) 248-1537

#### - CERTIFICATE OF ANALYSIS -(MRS #E84207 and FDER CompQap #900306)

To: Gulf Coast Thermo King

7802 May 301 Tampa, FL 33637 Report Date:

8/06/98

Page:

Collection Information:

1 of 1

Attn: Keith Worthrup

PEL Lab #

: 9807-00384-1

Client ID

: Antifreeze Lig

Project ID Location

: Gulf Coast Thermo King

Sample Date: 7/28/98 Sample Time: 14:05

Sampled By : Client Sample Quality:

Matrix : Liquid

Parameter	Method	Results	ND = Less that Units	n RL RL
Relogemented Volatiles by GC	EPA 6010	2510	ug/l	1.6
Trichloroethene	EPA 8021 RPA 8021	MD	ug/1	
Tetrachloroethene Analysis date	EPA 8021 EPA 8021	13	ug/l	2.5 3.2
*1.4Dichlorobutane(10-150%) *4-BFB (10-150%)	EPA 8021	8-4- <i>9</i> 8 119	₹R	
Aromatic Volatiles by GC	EPA 8021 EPA 8021	108	*R	
Renzena Analysia date	EPA 5021 EPA 8021	9.5 8/4/98	<b>ug/1</b>	1.7
*4-BFB (10-150%) TCLP Lead	<b>BPA</b> 8021	112	<b>42</b>	
TCLP Volatiles	1311/6010	2.64	mg/1	0.03
TCLP Tetrachloroethene TCLP Trichloroethene	1311/8260 1311/8260	<b>XD</b>	mg/l	0.0014
TCLP Benzene Analysis Date	1311/8260	ND ND	∞g/1 mg/1	0.004 0.0039
•	PPA 8260	<b>8-5-98</b>	<b>J</b> .	

Respectfully submitted, Vincent M. Giampa, Laboratory Manager.

A Florida Progress Company



4420 Pendala Point Read Temps, Florida 33619 (613) 247-2805 FAX: (813) 248-1537

#### - CERTIFICATE OF AMALYSIS -(MRS #E84207 and FDER CompQap \$900306)

To: Southwest FL Water Dist.

2379 Broad St.

Brooksville, PL 34609

Report Date:

8/07/98

Page:

1 of 1

Attn: Amme Jacques

PRL Lab #

: 9807-00392-1

Client ID Project ID

: Antifreeze

Location Matrix

: Antifreeze

: Liquid

Collection Information:

Sample Date: 7/29/98 Sample Time: 15:00

Sampled By : Client

Sample Quality:

Method  PPA 6010  1311/6010  EPA 8021  EPA 8021  EPA 8021	1350 0.10	Units ug/l mg/l	1.8 0.03
1311/6010 EPA 8021 EPA 8021	0.10		1.8
EPA 8021 1311/8260 1311/8260 1311/8260 1311/8260 EPA 8260 EPA 8021 EPA 8021	111 08-05-98 84.7 0.51 ND ND 08-05-98	ug/l  PR  mg/l  mg/l  mg/l	0.0036 0.0083 0.0036
EPA 8021 EPA 8021	08-05-98 87.0	ug/1	16
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Respectfully submitted, Vincent M. Giampa, Laboratory Manager.

A Florida Progress Company

## INTERNATIONAL PETROLEUM CORPORATION GENERATOR'S WASTE MATERIAL PROFILE SHEET

A GENERAL INFORMAT	T- /·	_				
GENERAL INFORMAT GENERATOR NAME: Day FACILITY ADDRESS: 966	Tateration	MELEURY)	NC BOW	TRANSP	ORTER:	_
- lay(me	Beach 32114		y pran	TRANSP	ORTER PHONE:	
TECHNICAL CONTACT: / 5		_			TOR US EPA 10#: FLD G	55754877
NAME OF WASTE: 1350	Anti home	TITLS: S			7 255 64/2 FAX	
PROCESS GENERATING WAS	STE:					
				QUANTI	Y:	
B. PHYSICAL CHARACTER	RISTICS OF WASTE					
Cotor						
BIWA DESCRIBE	Rubbery	STRONG	PHYSICAL STATE	ര 70°F	LAYERS	
DESCRIBE	Lubberr					FREE LIQUIDS
Green =			2 LIQUID D POW	I-SOLID	O MULTILAYERED O BI-LAYERED	EYES
•					D SINGLE PHASED	□ NO
pH: □ < 2 B 7.1-10	SPECIFIC GRA	AVITY				VOLUME/00
☐ 2-4 ☐ 10.1-12.5 ☐ 4.1-6.9 ☐ > 12.5	□ <.8 📋 1	1.3-1.4 r	LASH POINT			
□ 4.1-6.9 □ > 12.5 □ 7 □ N/A	□ .8-1.0 □ 1	16-17	70°F-100°F		D > 200°F D NO FLASH	O CLOSED CL
G EXACT	© 1.1-1.2 □>	· 1.7 🛛	101°F-139°F	į.	I EXACT	D OPEN CUP
	O EXACT		140°F-200°F			
CHEMICAL COMPOSITION S						•
. CHEMICAL COMPOSITION (	TOTALS MUST ADD TO	O 100%) D	METALS OT	OTAL (nn	m): [] EQA (YZD. 400-0)	
•			٠.	orac (pp	m) DEPA EXTRACTION	PROCEDURE.
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		% B,	ARIUM (ba)		SELENIUM (se)	4
		% C	ADMIUM(cd)		SiLVER (39)	
		% C	HROMIUM(cr)		NOVEL (CO)	
		%. M	ERCURY(ha)		70101	
		% LE	AD(pb)		HALLIUMGO	
			ID A LOUIS TO THE REAL PROPERTY OF THE PARTY			
		% C}	ROMIUM-HEX (C	x + 6):	12 (620)	
ECK ONE BOX			HROMIUM-HEX (c	x + 6): _	HALLIUM(ii)	
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### INTERNATIONAL OIL SERVIC

TRANSPORTATION AND RECEIVING MANIFEST

OATY

DIV. OF INTERNATIONAL PETROLEUM CORP.
STATE CERTIFIED RECYCLER, TRANSPORTER AND COLLECTION FACILITY

EPA I.D. No. FLD 065680613 SO 29-181143	I AD no	2096106	MOD 981114051	,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,
PLANT CITY, FL 33566 105 S. ALEXANDER ST. (813) 754-1504 TAMPA, FL (813) 229-1739 (800) 282-9585 FAX 1 (813) 754-3789  WILMINGTON, DE 19801 505 S. MARKET ST.	RECYC  • USED OIL  • USED OIL  • USED AN	LING FILTERS TIFREEZE JIM CONTACT	LA I.D. No. GT—186  NEW ORLEANS, I 14890 INTRACOAS (504) 254-9021 (800) 523-9071  BALTIMORE, MD 2	21224
(302) 421-9307	for a better t	omorrow.	6305 E. LOMBARD (800) 222-2511	) ST.
	IDENTIF ORISHIPPER DDRESS STATE	tone 1	Mercur Phone 6'20	y 3 57
13256	INFORM	MOIȚAN	257.	1657=
PROPER SHIPPING NAME COMBUSTIBLE LIQUID, N.O.S. (CONTAINS PETROLEUMOIL)	HAZARD CLA		ION NUMBER PACKING GROU	P N.A.E.R.G.
SOURCE TYPE (USED OIL)	#40	262		
SPECIAL HANDLING INSTRUEND USE CODE MINI/SR	JCTIONS		NCY RESPONSE NUM NTREC 1-800-424-930	
CERTIFICATIO  This is to cartify that the above-named materials of described, packaged, marked and labeled, and are transportation according to the applicable regulat Transportation.	are properly classified,		S QUANTITY TT 3500	GAL.
This is to further certify under pensity of law that have not been mixed with hazardous waste accord. U.S. Environmental Protection Agency and the Fix Environmental Protection.  X. **  **  **  **  **  **  **  **  **  **	riles to the sules of the	DEDUCTION NET GALLO	200	Golfe
GENERATOR'S SOM TURE	DATE	PRICE PER	GALLON 50-C	<del></del>
SIGNATURE	DATE	TOTAL	·	·
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prestige printing pp-2004R 7/96				<b>3</b>
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### PHOSLAB

741-682-5897

806 W. Beacon Road • Lakeland, Florida 33803

Fax 941-683-3279

Client:

International Petroleum Corporation

105 South Alexander Street Plant City, Florida 33566

Attn:

Mr. Leo James

P. O. #:

Daytona Lincoln/Mercury

Project: Reference:

Used Antifreeze

Sampled By:

A.M. Malatino

Sample Date:

09-30-97

Date Received: Analysis Date: 09-30-97 10-01-97

Analyzed By:

**GJF/JMC** 

#### **CERTIFICATE OF ANALYSIS**

TOXICITY CHARACTERISTIC LEACHING PROCEDURE

**EPA METHOD 1311** 

Sample ID: Use

Regulatory Limit

0.70 0.50 0.50 5.00

	Conc mg/L	
Tetrachloroethene	<0.01	
Trichloroethene	<0.01	
Benzene	<0.01	
Lead	<0.01	

QA OFFICER

CHEMIST



4420 Pendola Point Road Tempa, Florida 33519 (813) 247-2805 FAX: (813) 248-1537

### - CERTIFICATE OF ANALYSIS - (HRS #E84207 and FDER CompQap #900306)

To: International Oil Service

105 South Alexander Street

Plant City, FL 33566

Report Date: 7/14/97

Page: 1 of

Attn: Bill Posey

PEL Lab #

: 9707-00095-1

Client ID Project ID

: Used Anti Freeze

Location

: New Smyrna Beach : Halifax Ford/Mercury

Matrix

: Anti Freeze

Collection Information: Sample Date: 7/09/97 Sample Time: 13:30 Sampled By: Client

Sample Quality:

Parameter	Makkad	Mathed		ND = Less than MDL	
	Method	Results	Units	MDL	
GC Volatiles	EPA 8010				
Dichlorodifluoromethane	EPA 8010	170			
cis-1,2-Dichloroethene	EPA 8010	ND	ug/l	120	
Chloromethane	EPA 8010	ND	ug/l	50.0	
Vinyl Chloride	EPA 8010	ND	ug/1	185	
Bromomethane	EPA 8010	ХD	ug/1	62.5	
Chloroethane	EPA 8010	ND	ug/l	127	
Trichlorofluoromethane	EPA 8010	ND	ug/l	72.5	
1,1-Dichloroethene	EPA 8010	ND	ug/l	90.0	
Methylene Chloride	EPA 8010	ND	ug/l	90.0	
Trans-1,2-dichloroethene		ND	ug/l	250	
1,1-Dichloroethane	EPA 8010	ND	ug/l	105	
Chloroform	EPA 8010	ND	ug/l	87.5	
1,1,1-Trichloroethane	EPA 8010	ND	ug/l	250	
Carbontetrachloride	EPA 8010	ND	ug/l	75.0	
1,2-Dichloroethane	EPA 8010	ND	ug/l	85.0	
Trichloroethene	EPA 8010	ND	ug/l	105	
1,2-Dichloropropane	EPA 8010	96.3	ug/l	90.0	
Bromodichloromethane	EPA 8010	ND	ug/1	95.0	
2-Chloroethylvinyl ether	EPA 8010	ND	ug/l	102	
Cis-1,3-Dichloropropene	EPA 8010	ND	ug/l	325	
Trans-1,3-Dichloropropene	EPA 8010	ND	ug/l	95.0	
1,1,2-Trichloroethane	EPA 8010	ND	ug/1	105	
Tetrachloroethene	EPA 8010	ND	ug/1	127	
Dibromochloromethane	EPA 8010	741	ug/l	90.0	
Sromoform	EPA 8010	ND	ug/1	120	
	EPA 8010	ND	ug/1	200	
1,1,2,2-Tetrachloroethane	EPA 8010	ND	ug/1	205	
malysis date.	EPA 8010	07-12-97	wg/ &	403	

- CONTINUED ON NEXT PAGE -

### - CERTIFICATE OF ANALYSIS -(HRS #584207 and FDER CompQap #900306)

To: International Oil Service 105 South Alexander Street

Plant City, FL 33566

Report Date: 7/14/97

Page: 2 of 4

Attn: Bill Posey

PEL Lab #

: 9707-00095-1 (Continued ...) Client ID : Used Anti Freeze

Parameter	Method	Results	ND = Less that Units	an MDL MDL
*1,4Dichlorobutane(10-150%)  *4-BFB (10-150%)  GC Volatiles  MTBE  Benzene  Toluene Chlorobenzene  Ethylbenzene m,p-Xylene o-Xylene 1,3-Dichlorobenzene 1,4-Dichlorobenzene 1,2-Dichlorobenzene Analysis date  *Fluorobenzene (81-124%) Lead	EPA 8010 EPA 8010 EPA 8020 EPA 6010	95.0 94.7 ND ND ND ND ND ND ND ND ND ND ND ND ND	*R  *R  ug/l  ug/l  ug/l  ug/l  ug/l  ug/l  ug/l  ug/l  ug/l  ug/l	157 62.5 77.5 108 108 118 132 142 147

### - CERTIFICATE OF ANALYSIS -(HRS #E84207 and FDER CompQap #900306)

To: International Oil Service 105 South Alexander Street

Plant City, FL 33566

Attn: Bill Posey

PEL Lab # : 9707-00095-2 Client ID

: Trip Blank Project ID : New Smyrna Beach Location : Halifax Ford/Mercury

Matrix : Anti Freeze Report Date: 7/14/97

Page: 3 of 4

Collection Information: Sample Date: 6/30/97 Sample Time: 0:00 Sampled By : PEL

Sample Quality:

Parameter	Method	Results	ND = Less the Units	an MDL
GC Volatiles	EPA 8010			
Dichlorodifluoromethane	EPA 8010	3775	_	
cis-1,2-Dichloroethene	EPA 8010	אס	ug/l	0.48
Chloromethane	EPA 8010	ND	ug/1	0.20
Vinyl Chloride	EPA 8010	ND	ug/l	0.74
Bromomethane		ND	ug/l	0.25
Chloroethane	EPA 8010	ND	ug/l	0.51
Trichlorofluoromethane	EPA 8010	ND	ug/l	0.29
1,1-Dichloroethene	EPA 8010	ND	ug/1	0.36
Methylene Chloride	EPA 8010	ND	ug/l	0.36
Trans-1,2-dichloroethene	EPA 8010	ND	ug/1	1.0
1,1-Dichloroethane	EPA 8010	ND	ug/1	0.42
Chloroform	EPA 8010	ND	ug/1	0.35
1,1,1-Trichloroethane	EPA 8010	ND	ug/1	1.0
Carbontetrachloride	EPA 8010	ND	ug/1	0.30
1,2-Dichloroethane	EPA 8010	ND	ug/l	
Trichloroethene	EPA 8010	ND	ug/1 ug/1	0.34
1,2-Dichloropropane	EPA 8010	ND	ug/1	0.42
Bromodichloromethane	<b>5PA</b> 8010	ND	<del>-</del> .	0.36
2-Chlomothade	EPA 8010	ND	ug/1	0.38
2-Chloroethylvinyl ether	EPA 8010	ND	ug/1	0.41
Cis-1,3-Dichloropropene	EPA 8010	ND	ug/1	1.3
Trans-1,3-Dichloropropene	EPA 8010	ND	ug/l	0.38
1,1,2-Trichloroethane	EPA 8010	ND	ug/l	0.42
Tetrachloroethene	EPA 8010	ND	ug/l	0.51
Dibromochloromethane	EPA 8010	ND	ug/l	0.36
Bromoform	EPA 8010		ug/l	0.48
1,1,2,2-Tetrachloroethane	EPA 8010	ND	ug/l	0.80
Analysis date	EPA 8010	ND 07-12 <b>-</b> 97	ug/l	0.82

<sup>-</sup> CONTINUED ON NEXT PAGE -

### - CERTIFICATE OF ANALYSIS - (HRS #E84207 and FDER CompQap #900306)

To: International Oil Service

105 South Alexander Street

Plant City, FL 33566

Report Date: 7/14/97

Page: 4 of 4

Attn: Bill Posey

PEL Lab #

: 9707-00095-2

(Continued ...)

Client ID

: Trip Blank

Parameter	Method	Results	ND = Less tha	n MDL MDL
*1,4Dichlorobutane(10-150%) *4-BFB (10-150%) GC Volatiles MTBE Benzene Toluene Chlorobenzene Sthylbenzene a,p-Xylene b-Xylene 1,3-Dichlorobenzene 1,4-Dichlorobenzene 1,2-Dichlorobenzene 1,2-Dichlorobenzene 1,3-Dichlorobenzene 1,3-Dichlorobenzene 1,3-Dichlorobenzene 1,3-Dichlorobenzene 1,4-Dichlorobenzene 1,3-Dichlorobenzene	EPA 8010 EPA 8010 EPA 8020	94.0 100 ND ND ND ND ND ND ND ND	#R #R ug/l ug/l ug/l ug/l ug/l ug/l ug/l ug/l	0.63 0.25 0.31 0.43 0.43 0.47 0.53 0.57 0.59
Fluorobenzene (81-1241)	EPA 8020	07 <b>-</b> 13-97 108	₹R	

### INTERNATIONAL PETROLEUM CORPORATION GENERATOR'S WASTE MATERIAL PROFILE SHEET

	ERAL INFORMA					
II GENERA	TOR NAME: 1-	Halifau Em	) Mercu	/\/ TD	ANSPORTER:	
FACILITY	ADDRESS: /30	7 N D'IKIE	Freway	TR	ANSPORTER PHONE:	
	New SA	syrna_	Beach FL		NERATOR US EPA ID#:_FLD	982153827
TECHNIC	AL CONTACT: 13	11 Posey	TITI E:	GE	NERATOR STATUS: 586	
II NAME OF	WASTE: USC	O Antiz	0072	PHON	NE:FAX_	
PROCESS	S GENERATING W	ASTE: AUT	1 Ropail	qu	JANTITY: 165 Pollar	
B. PHYS	ICAL CHARACTI	ERISTICS OF WA	ASTE			
Color	ODOR	□ NONE MIL	D STRONG	PHYSICAL STATE @ 7	MAR LAVERS	
Brun		BE Robbert				FREE LIQUIDS
1	DESCRIB		<del></del>	SOUTH SEMI-SO	OLID I MULTILAYERED	BYES .
Green				DELIQUID D POWDE	R 🗆 BI-LAYERED 🗆 SINGLE PHASED	□ NO
DH: □ < 2				•	LI SINGLE PRASED	VOLUME%
2-			IC GRAVITY  1.3-1.4	FLASH POINT		
☐ 4.º	1-6.9 🗆 > 12.5		☐ 1.5-1.4 ☐ 1.6-1.7	□ < 70°F □ 70°F -100°F	□ > 200°F	CLOSED CUP
07		□ 1.1 <b>-</b> 1.	2 🗆 > 1.7	□ 101°F-139°F	☐ NO FLASH ☐ EXACT	☐ OPEN CUP
1 45	CACT	□ EXAC	T	☐ 140°F- 200°F		•
C. CHEMIC    (mg/L)	CAL COMPOSITIO	N (TOTALS MUST	ADD TO 100%)	D. METALS TOT	AL (ppm) DEPA EXTRACTION	ON PROCEDURE
(g, c)	•					
ļ			%	ARSENIC (as)	SELENIUM (se	
			%	BARIUM (ba)	SELENIUM (se SILVER (ag) COPPER(cu)	·/
				CADMIUM(cd)	COPPER(cu)	•
			%		NUCKEI (DI)	
			%. %	mercook ((ig)	ZINC(Zn)	
			%	CHROMIUM-HEX (cr	HALLIUM(ti)	
<u> </u>				OT IT COMIDINI-MEX (CF	+ 0):	
CHECK ON	E BOX					
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	☐ SOLIDS OR SI☐ SOLIDS OR SI	LUDGES THAT ARE N	NOT PETROLEUM R	ELATED: EXPLAIN:		
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#### IN I EKNAIIONAL OIL SERV TRANSPORTATION AND RECEIVING MANIFEST DIV. OF INTERNATIONAL PETROLEUM CORP. STATE CERTIFIED RECYCLER, TRANSPORTER AND COLLECTION FACILITY EPA I.D. No. FLD 065680613 SO 29-181143 MOD 981114051 LA I.D. No. GT—186 LAD 092096106 PLANT CITY, FL 33566 RECYCLING NEW ORLEANS, LA 70129 105 S. ALEXANDER ST. (813) 754-1504 14890 INTRACOASTAL DR. USED OIL (504) 254-9021 TAMPA, FL (813) 229-1739 USED OIL FILTERS USED ANTIFREEZE (800) 523-9071 (800) 282-9585 PETROLEUM CONTACT FAX 1 (813) 754-3789 WATER WILMINGTON, DE 19801 505 S. MARKET ST.. (302) 421-9307 BALTIMORE, MD 21224 6305 E. LOMBARD ST. Recycling today for a better tomorrow. (800) 222-2511 **IDENTIFICATION** INFORMATION PROPER SHIPPING NAME HAZARD CLASS | IDENTIFICATION NUMBER | PACKING GROUP COMBUSTIBLE LIQUID, N.O.S. (CONTAINS PETROLEUMOIL) N.A.E.R.G. COMBUSTIBLE NA 1993 LIQUID 111 128 SOURCE TYPE (USED OIL) SPECIAL HANDLING INSTRUCTIONS **EMERGENCY RESPONSE NUMBER** END USE CODE MINI/SR CHEMTREC 1-800-424-9300 CERTIFICATION CONTAINERS UNIT π GAL **DEDUCTIONS** NET GALLONS PRICE PER GALLON 100 @ PORTER No. 2 SIGNATURE & DATE **FREIGHT** DATE TOTAL 97-PC MANIFEST DOCUMENT NO. (INVOICE TO FOLLOW) Whtle - Original Yellow - Receiving Facility Pink - Transporter G'rod - Generator ige printing pp-2004R 7/98

# INTERNATIONAL OIL SERV.

RECEIVING MANIFEST

DIV. OF INTERNATIONAL PETROLEUM CORP.

SIAIE CENTIFIED RECT	CLER, INANSPOR	TIEM AND C	OLLECTION F	ACILITY
EPA I.D. No. FLD 065680613 SO 29-181143	LAD 0920961		981114051 D. No. GT—186	
PLANT CITY, FL 33566 105 S. ALEXANDER ST. (813) 754-1504 TAMPA, FL (813) 229-1739 (800) 282-9585 FAX 1 (813) 754-3789	RECYCLIN  USED OIL  USED OIL FILTE  USED ANTIFRE  PETROLEUM COWATER	RS EZE	NEW ORLEANS, LA 14890 INTRACOAST (504) 254-9021 (800) 523-9071	
WILMINGTON, DE 19801 505 S. MARKET ST. (302) 421-9307	Recycling toda for a better tomor	y	BALTIMORE, MD 21: 6305 E. LOMBARD \$ (800) 222-2511	
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PROPER SHIPPING NAME	HAZARD CLASS	IDENTIFICATION NUM	IBER PACKING GROUP	N.A.E.R.G.
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### IN ICRIVALIUNAL UIL SERVIC

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TRANSPORTATION AND RECEIVING MANIFEST

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### DIV. OF INTERNATIONAL PETROLEUM CORP. STATE CERTIFIED RECYCLER, TRANSPORTER AND COLLECTION FACILITY

EPA I.D. No. FLD 065680613 SQ 29-181143	LAD 0920	96106	MOD 9811 LA I.D. No		
PLANT CITY, FL 33566 105 S. ALEXANDER ST. (813) 754-1504 TAMPA, FL (813) 229-1739 (800) 282-9585 FAX 1 (813) 754-3789	RECYCLING  • USED OIL  • USED OIL FILTERS  • USED ANTIFREEZE  • PETROLEUM CONTACT WATER		14890 (504)	NEW ORLEANS, LA 70129 14890 INTRACOASTAL DR. (504) 254-9021 (800) 523-9071	
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aty Mer l	STATE STATE	ZIP	Phone	E-9	
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# INTERNATIONAL OIL SERVI RAD, CRICE

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TAMPA, FL . USED OF	L	(504) 254-9021
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WATER		
WILMINGTON, DE 19801	•	
505 S. MARKET ST. Recycling (302) 421-9307 for a better	today	BALTIMORE, MD 21224
(302) 421-9307 for a better	tomorrow.	6305 E. LOMBARD ST. (800) 222-2511
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### PHOSLAB

Phone 941-682-5897

806 W. Beacon Road • Lakeland, Florida 33803

Fax 941-683-3279

Client:

International Petroleum Corporation

105 South Alexander Street Plant City, Florida 33566

Attn:

Mr. Bill Posey

P. O. #: Project:

Halifax Ford/Mercury

Reference:

Used Antifreeze

Sampled By:

A.M. Malatino

Sample Date:

09-30-97

Date Received:

09-30-97

Analysis Date:

10-01-97

Analyzed By:

GJF/JMC

#### CERTIFICATE OF ANALYSIS

TOXICITY CHARACTERISTIC LEACHING PROCEDURE

**EPA METHOD 1311** 

Sample ID: Used Antifreeze

,	Conc. mg/L	Regulatory Lim	
Tetrachloroethene	<0.01	0.70	
Trichloroethene	<0.01	0.50	
Benzene	<0.01	0.50	
Lead	<0.01	5.00	

OA OFFICER

CHEMIST

FDER QA/QC #870308G

**Environmental Conservation Laboratories** 10207 General Drive Orlando, Florida 32824 407 / 826-5314 Fax 407 / 850-6945 . ...



Laboratories

DHRS Certification No. E83182

CLIENT : Malatino & Associates

ADDRESS: P.O. Box 6630

Lakeland, FL 33807

REPORT #

: OR6319 -

DATE SUBMITTED: January 21, 1997

DATE REPORTED : January 28, 1997

PAGE 1 OF 3 .

ATTENTION: Tony Malatino

#### SAMPLE IDENTIFICATION

Sample submitted and identified by client as:

Honda

01/20/97

- WASTE ANTI-FREEZE

MALATINO & ASSOCIATES, INC.

"Specialists in Environmental Testing and Services"

TONY MALATINO, C.H.M.S., C.E.I. President

4415 Florida National Drive, Suites 101 & 103

Mailing Address: P.O. Box 6630

(941) 646-2828

Lakeland, Florida 33807-6630

Tel. & Fax (941) 648-4285

LABORATORY MANAGER

ENCO LABORATORIES

REPORT # : OR6319

DATE REPORTED: January 28, 1997

PROJECT NAME : Honda

PAGE 2 OF 3

#### RESULTS OF ANALYSIS

EPA METHOD 8010 -				
TCLP VOLATILE HALOCA	RBONS	WASTE ANTI-FREEZE	LAB BLANK	<u>Units</u>
Trichloroethene		200 U D1	1 U	μg/L
Tetrachloroethene	·	700 D1	2 U 	μg/L
Surrogate:		% RECOV	% RECOV	<u>LIMITS</u>
Bromofluorobenzene		111	105	45-141
Date Analyzed		01/27/97	01/27/97	<u> </u>
PA METHOD 8020 - CLP VOLATILE AROMAT	ICS	WASTE ANTI-FREEZE	LAB BLANK	<u>Units</u>
Benzene		200 U D1	1 U	μg/L
_Surrogate:		% RECOV	% RECOV	LIMITS
Bromofluorobenzene		117	109	65-138
Date Analyzed		01/27/97	01/27/97	
TCLP METALS	METHOD	WASTE ANTI-FREEZE	LAB_BLANK	<u>Units</u>
TCLP Lead Date Analyzed	7420	<b>2.39</b> 01/28/97	0.50 U 01/28/97	mg/L

D1 = Analyte value determined from a 1:200 dilution.
U = Compound was analyzed for but not detected to the level shown.

ENCO LABORATORIES

REPORT # : OR6319

DATE REPORTED: January 28, 1997

PROJECT NAME : Honda

PAGE 3 OF 3

#### QUALITY CONTROL DATA

	% RECOVERY	ACCEPT	% RPD	ACCEPT
<u>Parameter</u>	MS/MSD/LCS	LIMITS	MS/MSD	<u>LIMITS</u>
EPA Method 8010				
Methylene chloride	100/118/ 98	43-148	16	29
Chloroform	81/102/ 90	61-118	123 J	15
Carbon Tetrachloride	92/112/103	51-126	20 J	14
_Trichloroethene	84/100/ 94	61-121	17	22
<b>retrachloroethene</b>	78/100/ 93	69-117	25 J	18
Chlorobenzene	79/ 95/ 89	67 <b>-</b> 119	18 J	10
1 Method 8020				
enzene	103/103/108	72-134	<1	20
oluene	102/104/107	72-124	2	19
Ethylbenzene	103/104/103	67-129	<1	21
D-Xylene	103/104/103	66-131	<1	21
TCLP Metals				
Lead, 7420	89/ 93/ 98	75-115	<b>4</b>	10

Environmental Conservation Laboratories Comprehensive QA Plan #960038

= Value exceeds established limit for precision

= Less Than

MS = Matrix Spike

YSD = Matrix Spike Duplicate

CS = Laboratory Control Standard

D = Relative Percent Difference

This report shall not be reproduced except in full, without the written approval of the laboratory.

### INTERNATIONAL OIL SEN

### TRANSPORTATION AND RECEIVING MANIFEST

Myric

DIV. OF INTERNATIONAL PETROLEUM CORP.
STATE CERTIFIED RECYCLER, TRANSPORTER AND COLLECTION FACILITY

CDA LD N	TEN HOWEN ON EN A	NO COLLECTION FACILITY
EPA I.D. No. FLD 065680613 SO 29-181143	LAD 092096106	MOD 981114051 LA I.D. No. GT—186
PLANT CITY, FL 33566 105 S. ALEXANDER ST. (813) 754-1504 TAMPA, FL (813) 229-1739 (800) 282-9585 FAX 1 (813) 754-3789	RECYCLING  • USED OIL  • USED OIL FILTERS  • USED ANTIFREEZE  • PETROLEUM CONTACT WATER	NEW ORLEANS, LA 70129 14890 INTRACOASTAL DR. (504) 254-9021 (800) 523-9071
WILMINGTON, DE 19801 505 S. MARKET ST. (302) 421-9307	Recycling today for a better tomorrow.	BALTIMORE, MD 21224 6305 E. LOMBARD ST. (800) 222-2511
	IDENTIFICATION HOTEL	State Shipped -9-97
Menut	lessett (band)	_ more 159-33ky
1-1125/	INFORMATION	
PROPER SHIPPING NAME COMBUSTIBLE LIQUID, N.O.S. (CONTAINS PETROLEUMOIL)	COMBUSTIBLE	ON NUMBER PACKING GROUP N.A.E.R.G. 1993 III 128
SOURCE TYPE TUSED OIL)	Do #14907	
SPECIAL HANDLING INSTRUCEND USE CODE MINI/SB		ICY RESPONSE NUMBER ITREC 1-800-424-9300
CERTIFICATION This is to certify that the above-named materiate are described packaged, marked and tabeled, and are in transportation actording to the applicable regulation Transportation. This is to further certify under penalty of law that the havy get been imited with flazardous waste according. U.S. Edutyformental Protection Agency and the Floric Ephrodinatial Protection.	properly classified, n proper condition for so of the Department of	T 250 or GAL.
U.S. Capurpomental Protection Agency and the Floric Environmental Protection.  GENERALOR Soughtrure	DEDUCTION  OF PRICE PER C	AS 100 MARIL
FRANSPORTER  SIGNATURE  97-PC 5389	DATE TOTAL	33000
MANIFEST DOCUMENT NO.	- Receiving Facility Pink - Transport	

# INTERNATIONAL OIL SERVIC

MOD 28

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	_ RECEIVING N			CHIC
	INTERNATIONAL		ORP.	- (1
STATE CERTIFIED RECYC	CLER, TRANSP	ORTER AND	COLLECTION	FACILITY
EPA I.D. No. FLD 065680613 SO 29-181143	LAD 0920	96106 MO	D 981114051 I.D. No. GT—186	
PLANT CITY, FL 33566 105 S. ALEXANDER ST. (813) 754-1504 TAMPA, FL (813) 229-1739 (800) 282-9585 FAX 1 (813) 754-3789	RECYCL  USED OIL  USED OIL FII  USED ANTIFI  PETROLEUM WATER	TERS REEZE	NEW ORLEANS, 14890 INTRACOA (504) 254-9021 (800) 523-9071	
☐ WILMINGTON, DE 19801 505 S. MARKET ST. (302) 421-9307	Recycling to for a better ton	day	BALTIMORE, MD 6305 E. LOMBAR (800) 222-2511	D ST.
Ment	IDENTIFIC TOR/SHIPPER	ATION? Hon	Dissiplined 6	-1297
	Menul	Island	Time Cary	
CITY MY MILE	STATE S	2325	Shorte-	40 //
_1/1251	INFORMA	TION	459	5344
PROPER SHIPPING NAME COMBUSTIBLE LIQUID, N.O.S. (CONTAINS PETBOLEUMOIL)	HAZARD CLAS COMBUSTIBLE LIQUID	S IDENTIFICATION N	UMBER PACKING GRO	UP N.A.E.R.G.
SOURCE TYPE (USED OIL)	153	86		
SPECIAL HANDLING INSTRU END USE CODE MINIOR	ICTIONS		RESPONSE NU EC 1-800-424-93	I .
CERTIFICATIO  This is to certify that the above-named materials a described, packaged, marked and labeled, and art transportation according to the applicable regulation.	e properly classified,	CONTAINERS  1 TT  No. TYPE	QUANTITY	GAL.
This is to further certify under penetry of law that have not been mixed with hazardous wasta accord. U.S. Environmental Production Agency and the Fix Environmental Production.	ding to the rules of the	DEDUCTIONS  NET GALLONS  PRICE PER GAT  FREIGHT	100 FR	rest
97-PC 9513	DATE :	TOTAL	CHARG	E
MANIFEST DOCUMENT NO.  White - Original Yello		L CASH	To FOLL	ow)

### INTERNATIONAL OIL St.

TRANSPORTATION AND RECEIVING MANIFEST

My

DIV. OF INTERNATIONAL PETROLEUM CORP.
STATE CERTIFIED RECYCLER, TRANSPORTER AND COLLECTION FACILITY

EPA I.D. No. FLD 065680613 SO 29-181143	LAD 092096106		MOD 981114051 LA I.D. No. GT—186		
PLANT CITY, FL 33566 105 S. ALEXANDER ST. (813) 754-1504 TAMPA, FL (813) 229-1739 (800) 282-9585 FAX 1 (813) 754-3789	RECYCL  USED OIL  USED OIL  USED ANTII  PETROLEUI  WATER	ILTERS FREEZE	14890 (504)	ORLEANS, LA INTRACOASTA 254-9021 523-9071	70129 IL DR.
☐ WILMINGTON, DE 19801 505 S. MARKET ST. (302) 421-9307	Recycling to	oday morrow.	6305	IMORE, MD 212 E. LOMBARD S 222-2511	
$ \sqrt{20}$	MOENTIFIE MONOSHIPPER Manual	CATION / MAN	Sha shi	8.27	757
me	nett ils	but &	(553)	Hef	
	INFORM	ZIP ATION			
PROPER SHIPPING NAME					
COMBUSTIBLE LIQUID, N.O.S. (CONTAINS PETROLEUM OIL)	HAZARD CLAS COMBUSTIBLE LIQUID	SS IDENTIFICATION NA 196		PACKING GROUP	N.A.E.R.G.
SOURCE TYPE (USED OIL)	POG	#15	5.	2/	•
SPECIAL HANDLING INSTRU END USE CODE MINUSP	CTIONS			ONSE NUMB 00-424-9300	ER .
CERTIFICATION This is to cartify that the above-named materials and described packaged, marked and labeled, and are transportation according to the applicable regulation Transportation.	e properly classified, in proper condition for me of the Department of	CONTAINERS  1 IT  No. TYPE		QUANTITY.	GAL.
This is to further carity under paralty of law that it have followed mixed with hazardust waste according U.S.Environmental hypercation Agency and the Flor Environmental Protection.  X  GENERATOR'S SIGNATURE	ne above-named materials ing to the rules of the idea Department of DATE	PEDUCTIONS NET GALLONS PRICE PER G	LLON .	her	
TRANSPORTE	IR No. 2 SIGNATURE & DATE	FREIGHT	25		
97-PC 13350 MANIFEST DOCUMENT NO. White - Original Yellow	v - Receiving Facility	CASH	r G'rod	CHARGE (INVOICE TO-FOLLOW)	
prestige printing pp-2004R 7/98	na sanga manga sa gangang				*

### INTERNATIONAL OIL SER.

TRANSPORTATION AND RECEIVING MANIFEST DIV. OF INTERNATIONAL BEINOLEUM CORP. STATE CERTIFIED RECYCLER, TRANSPORTER AND COLLECTION FACILITY EPA I.D. No. FLD 065680613 SO 29-181143 MOD 981114051 LA I.D. No. GT-186 LAD 092096106 PLANT CITY, FL 33566 RECYCLING NEW ORLEANS, LA 70129 14890 INTRACOASTAL DR. (504) 254-9021 105 S. ALEXANDER ST. (813) 754-1504 TAMPA, FL USED OIL USED OIL FILTERS USED ANTIFREEZE (813) 229-1739 (800) 523-9071 (800) 282-9585 FAX 1 (813) 754-3789 PETROLEUM CONTACT WATER WILMINGTON, DE 19801 BALTIMORE, MD 21224 6305 E. LOMBARD ST. 505 S. MARKET ST. (302) 421-9307 Recycling today for a better tomorrow. (800) 222-2511 **INFORMATION** PROPER SHIPPING NAME | HAZARD CLASS | IDENTIFICATION NUMBER PACKING GROUP COMBUSTIBLE LIQUID, N.O.S. N.A.E.R.G.

(CONTAINS PETROLEUM OIL) LIQUID	NA 1993.	111	,
SOURCE TYPE (USED OIL)	,	<del> </del>	
# 14289)			
SPECIAL HANDLING INSTRUCTIONS ENDUSE CODE MINISTRUCTIONS	EMERGENCY RES CHEMTREC 1-	PONSE NUM 300-424-9300	BER
	<del></del>		

CERTIFICATION Π GAL **DEDUCTIONS NET GALLONS** DATE GENERATOR'S PRICE PER GALLON TRANSPORTER No. 2 SIGNATURE & DATE **FREIGHT** SIGNATURE DATE TOTAL MANIFEST DOCUMENT NO. (INVOICE TO FOLLOW)

Whtle - Original

Yellow - Receiving Facility

Pink - Transporter

G'rod | Generator



## Progress Environmental Laboratories

4420 Pendola Point Road Tampa, Florida 33619 (813) 247-2805 FAX: (813) 248-1537

> - CERTIFICATE OF ANALYSIS -(HRS #584207 and FDER CompQap #900306)

ΤŪ

To: International Oil Service

105 South Alexander Street

Plant City, FL 33566

Report Date: 8/01/97

Page: 1 of 2

Attn: Cale Reed

PBL Lab # Client ID

: 9707-00291-1

Project ID

: Used Antifreeze

Location

: #1

Matrix

: Jim's Import Auto : Used Antifreeze

Collection Information: Sample Date: 7/24/97

Sample Time: 14:30

Sampled By : Client

Sample Quality:

Parameter	Method	Results	ND = Less than Units	MDL 1	:
GC Volatiles	PDR COL				
ichlorodifluoromethane	EPA 8010				
is-1,2-Dichloroethene	EPA 8010	ND	ug/l	48.0	
Chloromethane	EPA 8010	ND	ug/l	20.0	
Vinyl chloride	EPA 8010	ND	ug/1	74.0	
Bromomethane	EPA 8010	ND	ug/1	25.0	
Chloroethane	EPA 8010	ND	ug/1	51.0	
Trichlorofluoromethane	BPA 8010	ND	ug/l	29.0	
1,1-Dichloroethene	EPA 8010	ND	ug/1		
Methylene chloride	EPA 8010	MD	ug/1	36.0	
trans-1,2-Dichloroethene	EPA 8010	ND	ug/l	36.0	
1,1-Dichloroethane	BPA 8010	ND	ug/1	100	
Chloroform	EPA 8010	ND		42.0	
1.1.1-Trichloroethane	EPA 8010	ND	ug/1	35.0	
Carbontetrachloride	EPA 8010	ND	ug/1	100	
1,2-Dichloroethane	BPA 8010	ND	ug/1	30.0	
Trichloroethene	EPA 8010	ND	ug/l	34.0	
	EPA 8010	ND	ug/l	42.0	
1.2-Dichloropropane	EPA 8010	ND	ug/1	36.0	
Bromodichloromethane	<b>BPA 8010</b>	ND	ug/l	38.0	
2-Chloroethyl vinyl other	EPA 8010	<del>-</del>	ug/1	41.0	
is-1,3-Dichloropropene	EPA 8010	ND	ug/l	130	
rang-1,3-Dichloropropene	EPA 8010	ND	ug/l	38.0	
1,1,2-Trichloroethane	EPA 8010	ND	ug/l	42.0	
etrachloroethene	BPA 8010	ND	ug/l	51.0	
ibromochloromethane	EPA 8010	ND	ug/l	36.0	
romoform	EPA 8010	ND	ug/1	48.0	
,1,2,2-Tetrachloroethane	BPA 8010	ND	ug/l	80.0	
nalysis date	EPA 8010	ND 07-30 <b>-</b> 97	ug/1	82.0	

- CONTINUED ON NEXT PAGE -

Progress Environmental Laboratories

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#### - CERTIFICATE OF ANALYSIS -(HRS #E84207 and FDER CompQap #900306)

To: International Oil Service

105 South Alexander Street

Plant City, FL 33566

Report Date: 8/01/97

Page: 2 of 2

Attn: Cale Reed

PEL Lab #

: 9707-00291-1 (Continued ...)

Client ID

: Used Antifreeze

Parameter	Method	Results	ND = Less tha Units	un MDL MDL	
*1,4Dichlorobutane(10-150%)  *4-BFB (10-150%)  GC Volatiles  MTBS  Benzene  Toluene  hlorobenzene  .thylbenzene  m,p-Xylene  o-Xylene  1,3-Dichlorobenzene  1,4-Dichlorobenzene  1,2-Dichlorobenzene  Analysis date  *Fluorobenzene (81-124%)  Lead	EPA 8010 EPA 8010 EPA 8020	113 78.3 ND ND ND ND ND ND ND ND ND ND ND ND ND	#R  ug/1  ug/1  ug/1  ug/1  ug/1  ug/1  ug/1  ug/1  ug/1	63.0 25.0 31.0 43.0 43.0 47.0 53.0 57.0 59.0 70.0	

Respectfully submitted, Vincent M. Giampa, Laboratory Manager.

## INTERNATIONAL PETROLEUM CORPORATION GENERATOR'S WASTE MATERIAL PROFILE SHEET

IT. LITY ADDRESS: 3636 DESOTA PO	wase TRANSPORTE	R: <u>I.o.</u> 5	
1. LITY ADDRESS: 3636 DESOTA RD SOCIETY & C 33 8 70	TRANSPORTE GENERATOR	R PHONE: US EPA ID#:	
ECHNICAL CONTACT: Cale Reed TITLE:	GENERATOR	STATUS: CFS	QG
NAME OF WASTE: USED ANTIGNEETE	11.0KL. 000 17	7 4707 FAX_	1 1 1
PROCESS GENERATING WASTE: AUTO DISMANILIO	es Repair QUANTITY:	100 99/10~	a de la companya de l
PHYSICAL CHARACTERISTICS OF WARM			
Color ODOR DINONE TO STRONG	•		
TE TONE GIMILD USIRONG	PHYSICAL STATE @ 70°F LAYE	ERS	FREE LIQUIDS
DESCRIBE Lobery	SOLID SEMI-SOLID ME	JLTILAYERED	BYES
Brown	POWDER BI	LAYERED	□ NO
H: [] < 2		NGLE PHASED	VOLUME COOK
□ 2-4 □ 10.1-12.5 □ <.8 □ 1.3-1.4	FLASH POINT	00°F	To come ye.
□ 4.1-6.9 □ > 12.5 □ .8-1.0 □ 1.6-1.7 □ 7 □ N/A □ 1.1-1.2 □ > 1.7	☐ 70°F -100°F ☐ NO	FLASH	□ CLOSED CUP
P EVACE	☐ 101°F-139°F ☐ EX	ACT	
C. CHEMICAL COMPOSITION (TOTALS MUST ADD TO 100%)	D. METALS   TOTAL (ppm)	I EPA EXTRACTION I	ROCEDURE
· ·			
%	ARSENIC (as)	_ SELENIUM (se) _	
	CADMIVIM(cd)	SILVER (ag)	
%	CHROMIUM(cr)	NICKEL(ni)	<del></del>
	ARSENIC (as) BARIUM (ba) CADMIUM(cd) CHROMIUM(cr) MERCURY(hg) LEAD(pb) CHROMIUM-HEX (cr + 6)	ZINC(zn)	
	CHROMIUM-HEX (cr + 6):	HALLIUM(ti)	
			<del></del>   .
CHECK ONE BOX			
SOLIDS OR SLUDGES THAT ARE NOT PETROLEUM RELA	TED: EXPLAIN:	.*	
SOLIDS OR SLUDGES CONTAMINATED WITH USED OIL:			1 21 22
SOLIDS OR SLUDGES CONTAMINATED WITH VIRGIN PET WASTE WATER THAT IS NOT PETROLEUM RELATED: EX	ROLEUM OIL	•	<b>1</b>
WASTE WATER CONTAMINATED WITH USED OIL	PLAIN:	<del></del>	
WASTE WATER CONTAMINATED WITH VIRGIN OIL			1./4.2    13
The state of the s			
WASTE WATER CONTAMINATED WITH FUEL			
WASTE WATER CONTAMINATED WITH FUEL USED OIL		•	
WASTE WATER CONTAMINATED WITH FUEL USED OIL USED OIL	· .	• •	
WASTE WATER CONTAMINATED WITH FUEL USED OIL USED OIL OTHER: SOIL THAT IS NOT PETROLEUM RELATED: EXPLAIN:			
WASTE WATER CONTAMINATED WITH FUEL USED OIL USED OIL VIRGIN FUEL OTHER: SOIL THAT IS NOT PETROLEUM RELATED: EXPLAIN: SOIL CONTAMINATED WITH USED OIL			
WASTE WATER CONTAMINATED WITH FUEL USED OIL USED OIL OTHER: SOIL THAT IS NOT PETROLEUM RELATED: EXPLAIN: SOIL CONTAMINATED WITH USED OIL SOIL CONTAMINATED WITH VIRGIN OIL	· · · · · · · · · · · · · · · · · · ·		
WASTE WATER CONTAMINATED WITH FUEL USED OIL USED OIL VIRGIN FUEL OTHER: SOIL THAT IS NOT PETROLEUM RELATED: EXPLAIN: SOIL CONTAMINATED WITH USED OIL	·	•	
WASTE WATER CONTAMINATED WITH FUEL USED OIL USED OIL USED OIL OTHER: SOIL THAT IS NOT PETROLEUM RELATED: EXPLAIN: SOIL CONTAMINATED WITH USED OIL SOIL CONTAMINATED WITH VIRGIN OIL SOIL FROM UST REGULATED BY 40 CFR, PART 280			
WASTE WATER CONTAMINATED WITH FUEL  USED OIL  VIRGIN FUEL  OTHER:  SOIL THAT IS NOT PETROLEUM RELATED: EXPLAIN:  SOIL CONTAMINATED WITH USED OIL  SOIL CONTAMINATED WITH VIRGIN OIL  SOIL FROM UST REGULATED BY 40 CFR, PART 280  NON-HAZARDOUS CERTIFICATION  I, the undersigned, under penalty of law do hereby carlify to the best of my knowledge is round listed hazardous waste and does not exhibit in the best of my knowledge is round listed hazardous waste and does not exhibit.	, the recyclable material submitted for acc	eplance lo international Pe	
WASTE WATER CONTAMINATED WITH FUEL  USED OIL  VIRGIN FUEL  OTHER:  SOIL THAT IS NOT PETROLEUM RELATED: EXPLAIN:  SOIL CONTAMINATED WITH USED OIL  SOIL CONTAMINATED WITH VIRGIN OIL  SOIL FROM UST REGULATED BY 40 CFR, PART 280  NON-HAZARDOUS CERTIFICATION  I, the undersigned, under penalty of law do hereby cartify to the best of my knowledge is repaired in the March 28, 1990 Federal register. Lividhor cartify the characteristics of a hasper lied in the March 28, 1990 Federal register.	201	eplance to international Pet of the toxicity characteristic	
WASTE WATER CONTAMINATED WITH FUEL  USED OIL  OTHER:  SOIL THAT IS NOT PETROLEUM RELATED: EXPLAIN:  SOIL CONTAMINATED WITH USED OIL  SOIL CONTAMINATED WITH VIRGIN OIL  SOIL FROM UST REGULATED BY 40 CFR, PART 280  NON-HAZARDOUS CERTIFICATION  I, the undersigned, under penalty of law do hereby certify to the best of my knowledge is the undersigned, under penalty of law do hereby certify to the characteristics of a hair penalty of the march 28,1990 Federal register. I further certify that the recyclable marks are its document of the state of generation, and that I am authorized to execute this document.	aterial submitted for acceptance to international	eptance to International Pet of the toxicity characteristic ational Petroleum Corporatio	
WASTE WATER CONTAMINATED WITH FUEL  USED OIL  VIRGIN FUEL  OTHER:  SOIL THAT IS NOT PETROLEUM RELATED: EXPLAIN:  SOIL CONTAMINATED WITH USED OIL  SOIL CONTAMINATED WITH VIRGIN OIL  SOIL FROM UST REGULATED BY 40 CFR, PART 280  NON-HAZARDOUS CERTIFICATION  I, the undersigned, under penalty of law do hereby carilfy to the best of my knowledge is the listed hazardous waste and does not exhibit any of the characteristics of a haspe ied in the March 28,1990 Federal register. I further certify that the recyclable mach examples in its state of generation, and that I am authorized to execute this documents.	laterial submitted for acceptance to International State of the Internation	of the toxicity characteristic ational Petroleum Corporatio	roleum Corporation revision rules as in is classified as
WASTE WATER CONTAMINATED WITH FUEL  USED OIL  VIRGIN FUEL  OTHER:  SOIL THAT IS NOT PETROLEUM RELATED: EXPLAIN:  SOIL CONTAMINATED WITH USED OIL  SOIL CONTAMINATED WITH VIRGIN OIL  SOIL FROM UST REGULATED BY 40 CFR, PART 280  NON-HAZARDOUS CERTIFICATION  I, the undersigned, under penalty of law do hereby carilfy to the best of my knowledge is the listed hazardous waste and does not exhibit any of the characteristics of a haspe ied in the March 28,1990 Federal register. I further certify that the recyclable mach examples in its state of generation, and that I am authorized to execute this documents.	laterial submitted for acceptance to International State of the Internation	of the toxicity characteristic ational Petroleum Corporatio	roleum Corporation revision rules as in is classified as
WASTE WATER CONTAMINATED WITH FUEL  USED OIL  OTHER:  SOIL THAT IS NOT PETROLEUM RELATED: EXPLAIN:  SOIL CONTAMINATED WITH USED OIL  SOIL CONTAMINATED WITH VIRGIN OIL  SOIL FROM UST REGULATED BY 40 CFR, PART 280  NON-HAZARDOUS CERTIFICATION  I, the undersigned, under penalty of law do hereby certify to the best of my knowledge is real listed hazardous waste and does not exhibit any of the characteristics of a haspe lied in the March 28,1990 Federal register. I further certify that the recyclable made in the March 28,1990 Federal register. I further certify that the recyclable made in the March 28,1990 Federal register. I further certify that the recyclable made in the March 28,1990 Federal register. I further certify that the recyclable made in the March 28,1990 Federal register. I further certify that the recyclable made in the materials submitted at least of the property of the property of the materials submitted at least of PCB's as defined in Section 6 (E) of TSCA (ISUSC2605) and (40 City).	aterial submitted for acceptance to International Petroleum R Part 761).	ctional Petroleum Corporation  Corporation does not contain	roleum Corporation revision rules as in is classified as
WASTE WATER CONTAMINATED WITH FUEL  USED OIL  VIRGIN FUEL  OTHER:  SOIL THAT IS NOT PETROLEUM RELATED: EXPLAIN:  SOIL CONTAMINATED WITH USED OIL  SOIL CONTAMINATED WITH VIRGIN OIL  SOIL FROM UST REGULATED BY 40 CFR, PART 280  NON-HAZARDOUS CERTIFICATION  I, the undersigned, under penalty of law do hereby certify to the best of my knowledger is in a listed hazardous waste and does not exhibit any of the characteristics of a haspe ied in the March 28,1990 Federal register. I further certify that the recyclable monocompact in its state of generation, and that I am authorized to execute this document and all attachments were prepared under the certify of law that this document and all attachments were prepared under generally of law that this document and all attachments were prepared under generally of law that this document and all attachments were prepared under generally of law that this document and all attachments were prepared under generally of law that this document and all attachments were prepared under generally of law that this document and all attachments were prepared under generally of law that this document and all attachments were prepared under generally of law that this document and all attachments were prepared under generally of law that this document and all attachments were prepared under general general general general generally of law that this document and all attachments were prepared under general	aterial submitted for acceptance to International Petroleum FR Part 761).  INITIAL  INITIAL  INITIAL	corporation does not conta	roleum Corporation revision rules as in is classified as
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## INTERNATIONAL OIL SERVI

TRANSPORTATION AND RECEIVING MANIFEST

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RECEIVING M	IANIFEST		CL	_A.\
INTERNATIONAL	PETROLEUM	CORP.	0 -	
LER, TRANSP	ORTER AND	COLL	ECTION F	ACILITY
LAD 09209				
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		6305	E. LOMBARD S	224 ST.
IDENTIFIC OR/SHIPPER	ATION	_ Date Sh	ilpped 9/29	197
DRESS )		_ Time		
	20	_ Phone		
INICODALA	ZIP	- ,,,,,,,,		
COMBUSTIBLE			PACKING GROUP	N.A.E.R.G. 128
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DATE	TOTAL		/	<del></del>
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ow - Receiving Facility	Pink - Transport	er G'r	od - Generator	
	INTERNATIONAL CLER, TRANSP  LAD 09209  RECYCL  USED OIL  USED OIL FII  USED ANTIFIC  PETROLEUM WATER  Recycling to for a better ton  IDENTIFIC  IDENTIFIC  INFORMA  HAZARD CLAS  COMBUSTIBLE  LIQUID  CTIONS  Nor proper condition for one of the Department of the above-named fixiterials ing to the giffe of the ride Department of the above-named fixiterials ing to the giffe of the cited Department of the above-named fixiterials ing to the giffe of the cited Department of the above-named fixiterials ing to the giffe of the cited Department of the above-named fixiterials ing to the giffe of the cited Department of the above-named fixiterials ing to the giffe of the cited Department of the cited Department of the above-named fixiterials ing to the giffe of the cited Department of the above-named fixiterials in the cited Department of the cite	INTERNATIONAL PETROLEUM CLER, TRANSPORTER AND LAD 092096106  RECYCLING  USED OIL USED OIL FILTERS USED ANTIFREEZE PETROLEUM CONTACT WATER  Recycling today for a better tomorrow.  IDENTIFICATION  INFORMATION  HAZARD CLASS IDENTIFICATION  COMBUSTIBLE LIQUID  NA 196  CTIONS  EMERGENCY CHEMT  NO. TYPE  DEDUCTIONS  NET GALLON  PRICE PER G.  FREIGHT  INFORMATURE & DATE  FREIGHT  PRICE PER G.	INTERNATIONAL PETROLEUM CORP. CLER, TRANSPORTER AND COLL  LAD 092096106  RECYCLING  USED OIL USED OIL USED OIL FILTERS USED ANTIFREEZE PETROLEUM CONTACT WATER  Recycling today for a better tomorrow.  IDENTIFICATION  IDENTIFICATION  PRESS  TIME  INFORMATION  HAZARD CLASS IDENTIFICATION NUMBER  COMBUSTIBLE LIQUID  CTIONS  EMERGENCY RES CHEMTREC 1- No 1993  CONTAINERS  1 TT No 179PE  CONTAINERS  1 T	INTERNATIONAL PETROLEUM CORP. CLER, TRANSPORTER AND COLLECTION FACELER, TRANSPORTER AND 9811114051 LA I.D. No. GT—186  RECYCLING

#### INTERNATIONAL OIL SERVI

TRANSPORTATION AND RECEIVING MANIFEST

SIMP. CLAJ

### DIV. OF INTERNATIONAL PETROLEUM CORP. STATE CERTIFIED RECYCLER, TRANSPORTER AND COLLECTION FACILITY.

SO 29-181143	LAD 09209	96106	MOD 9811 LA I.D. N	o. GT—186	
PLANT CITY, FL 33566 105 S. ALEXANDER ST. (813) 754-1504 TAMPA, FL (813) 229-1739 (800) 282-9585 FAX 1 (813) 754-3789	RECYCLI  USED OIL FIL  USED ANTIFI  PETROLEUM WATER	LTERS REEZE	1489 (504)	ORLEANS, LA DINTRACOASTA 254-9021 523-9071	
WILMINGTON, DE 19801 505 S. MARKET ST. (302) 421-9307	Recycling to for a better toπ		6305	IMORE, MD 212 E. LOMBARD S 222-2511	224 ST.
Jim Closh GENERATOR	IDENTIFIC LINE	ATION	Date SI	nipped 9/4	197
Selerin St ADOR			Time		
Highlas STA	INFORMA	ATION			
PROPER SHIPPING NAME   H	AZARD CLAS	SIDENTIFICATIO	N NUMBER	PACKING GROUP	N.A.E.R.C
THE THE PERSON OF THE PERSON O	INENTID VENC	JO   IDEITTING			14.2-2.2.11.0
	COMBUSTIBLE LIQUID	NA 1	993	. 141	128
SPECIAL HANDLING INSTRUC	. ,	EMERGEN	CYRES	PONSE NUM	BER
(CONTAINS PETROLEUM OIL)  SOURCE TYPE (USED OIL)  CO/A	. ,	EMERGEN CHEM	CYRES	PONSE NUM 800-424-9300	BER
SOURCE TYPE (USED OIL)  SOURCE TYPE (USED OIL)  SPECIAL HANDLING INSTRUCEND USE CODE MINI/SR  CERTIFICATION  This is to certify that the above-named materiale are in described, packaged, marked and labeled, and are in transportation according to the applicable regulations.	TIONS  properly classified, proper condition for	EMERGEN CHEM CONTAINERS	CYRES	PONSE NUM	BER
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### INTERNATIONAL OIL SERV

TRANSPORTATION AND RECEIVING MANIFEST

CLAS

#### DIV. OF INTERNATIONAL PETROLEUM CORP. STATE CERTIFIED RECYCLER, TRANSPORTER AND COLLECTION FACILITY

EPA I.D. No. FLD 065680 SO 29-181143		2096106	MOD 981114051 LA I.D. No. GT—18	5
PLANT CITY, FL 33 105 S. ALEXANDER (813) 754-1504 TAMPA, FL (813) 229-1739 (800) 282-9585 FAX 1 (813) 754-378	USED OIL USED OIL USED ANT USED ANT	FILTERS	NEW ORLEAN 14890 INTRAC (504) 254-902 (800) 523-907	OASTAL DR.
WILMINGTON, DE 1 505 S. MARKET ST. (302) 421-9307			BALTIMORE, 6305 E. LOMB (800) 222-2511	ARD ST.
1419 <i>F3732</i> A	GENERATORISHIPPER	ACOUNTE	Date Shipped	120/97
Selesies 0	ADORESS	33870	941-471	- 1177
CITY	STATE	ZIP	Phone	
Sighten	INFOR	MATION		•
PROPER'SHIPPING	NAME HAZARD CL	ASS IDENTIFICATION	ON NUMBER PACKING	GROUP N.A.E.R.G.
COMBUSTIBLE LIQUID,		. NA 1	1993 111	128
(CONTAINS PETROLEU	MOIL) LIQUID			
SOURCE TYPE (USED OIL)	& Le 10 R	7.00	14 day	
SOURCE TYPE (USED OIL)	B Le 10 /	EMERGEN		NUMBER
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Peport Date : 10/20/97

\_PC FLORIDA

PRODUCT PICK-UP HISTORY FOR A CUSTOMER (DETAIL) : 07/01/97 - 10/20/97

BY CUSTOMER KEY . FOR RANGE: CUST = A4414 - A4414 , DRIVER = -BEG- - -END-

PRODUCT = ATF - ATF ACTIVE =

Customer: A4414 AUTO JIM'S IMPORT SALVAGE

3636 DESOTO RD

Driver: CLARK, JOE SEBRING FL 33870

DATE	MANIFEST	PRODUCT	GROSS	SALE	COS'
07/28/97 09/04/97 09/29/97	000000000011749 000000000014052 000000000015434	ATF	40.00 40.00 50.00	00.2500 00.2500 00.2500	
TOTAL RECO	DRDS: 3		130.00	00.2500	00.0000
TOTAL REPO	ORT RECORDS: 3		130 00	00 2500	00 000

Profile List

FERTINITIES CO.UD 0108464200 BEST AVAILABLE COPY MALATIMA ABBUU

FAUL UI

FROM : ENVIRONMENTAL CONSERVATION LAB PHONE NO. : 4078506945.

Dec. 12 1995 05:27PM P1

Environmental Conservation Laboratories 10207 General Drive Orlando, Fiorida 32824 407 / 828-5314 Fax 407 / 850-6945



Laboratories

DHR8 Certification No. 83318, 883162

CLIENT : Malatino & Associates

ADDRESS: 4415 Florida National Dr.

Suite 101 & 103

Lakeland, FL 33807

REPORT # : OR3014

DATE SUBMITTED: December 8, 1995 DATE REPORTED: December 12, 1991

PAGE 1 OF

ATTENTION: Tony Malatino

#### SAMPLE IDENTIFICATION

Samples submitted and identified by client as:

Mazda Village

12/07/95

#1 - 5-DRUM COMPOSITE

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12/2

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ENCO LABORATORIES

REPORT # : OR3014

DATE REPORTED: December 12, 1995

PROJECT MANE : Masda Village

PAGE 2 OF 4

#### RESULTS OF ANALYSIS

TCLP SOLO	5-DRUM COMPOSITE LAB BLANK
Trichlorosthene Tetrachlorosthene	11300 D
Surrogate: Bromofluorobenzene ( Date Analyzed	aurr) 92 102 LINI 12/09/95 12/08/95
EPA METHOD SORO -	Engine Control of the
Benzene Surrogate:	S-DRUM COMPOSITE LAB BLANK Units 200 U D2 1 U
RECHARILLAND	RECOV 12/09/95 12/08/95 LINIT

Analyte value determined from a 1:500 dilution of the sample 02 = Analyte value determined from a 1:100 dilution of the sample 0 = Compound was analyzed for but not detected

FROM : ENVIRONMENTAL CONSERVATION LAB PHONE NO. : 4078506945

Dec. 12 1995 05:29PM P3

SMCO LABORATORIES

فياليباني والإناري أأفياه الأخلية فالأ

REPORT # : OR3014 DATE REPORTED: December 12, 1995

PROJECT MANE : Mazda Village

PAGE 3 OF

RESULTS OF ANALYSIS

TOLP METALS METHOD S-DRUM COMPOSITE Unita TCLP Lead 7420 0.50 U Date Analyzed 12/10/95

Dec. 12 1995 05:29PM P4

ENGO LABORATORIES

REPORT # 1 OR3014 DATE REPORTED: December 12, 1995

PROJECT NAME : Mazda Village

PAGE 4 OF

OUNTITY CONTROL DATA

Parameter	# RECOVERY MS/MSD/LCS	ACCEPT LIXITS	NE/MED	accept Lixits
TCLP 8010 Yethylana Chlorida hloroform Carbon Tetrachlorida Trichloroethena Tetrachloroethena Chlorobenzena	125/115/105 105/110/105 105/100/105 85/ 85/ 85 100/105/110 100/110/110	49-154 62-145 53-151 59-139 62-147 64-137	8 5 5 <1 5	32 28 32 29 27 28
TCIP 8020 Benzene Toluene Ethylbenzene o-Xylene	90/ 95/ 90 90/ 90/ 90 85/ 85/ 90 85/ 90/ 85	68-136 73-121 68-126 65-130	5 <1 <1 6	24 21 24 22
TCLR Metals Lead, 7420	93/ 95/ 85	81-110	2	10

LABORATORY MANAGER

David 7. Vesey

Environmental Conservation Laboratories Comprehensive QA Plan #880817G

< - Less Than

Ms - Matrix Spike

MSD - Matrix Spike Duplicate

LCS = Laboratory Control Standard

RPD = Relative Percent Difference

Mør Ruma

### INTERNATIONAL OIL SERVICE

TRANSPORTATION AND RECEIVING MANIFEST

DIV. OF INTERNATIONAL PETROLEUM CORP.
STATE CERTIFIED RECYCLER, TRANSPORTER AND COLLECTION FACILITY

EPA I.D. No. FLD 065680613 SO 29-181143	LAD 092		MOD 98		racili i
PLANT CITY, FL 33566 105 S. ALEXANDER ST. (813) 754-1504 TAMPA, FL (813) 229-1739 (800) 282-9585 FAX 1 (813) 754-3789	RECYCLING  • USED OIL  • USED OIL FILTERS  • USED ANTIFREEZE  • PETROLEUM CONTACT WATER		148 (50	W ORLEANS, L 90 INTRACOAS 4) 254-9021 0) 523-9071	
WILMINGTON, DE 19801 505 S. MARKET ST. (302) 421-9307	Recycling to		630	LTIMORE, MD 2 15 E. LOMBARD 0) 222-2511	21224 ST.
14	IDENTIFIC	CATION			
MIOSS MAZOA GENERAT	1/1/AGE		_ Date S	3-1	4-96
<u></u>	US /	9	Time_		
Clark	DRESS.	34625		813-791-	-8171
ary s	TATE	ZIP			
	INFORM	ATION		·	
1 T 3/A	DESCRIPTION AND CLAS: Proper Shipping Name, i ation Number C.F.R. 172.10	Class and	UN No. or NA No.	EXEMPTION OR NO LABELS REQUIRED	FLASH POINT (IN°C) WHEN REQ'D
(Used Oil) Fuel Oil Packaging Gr		ole Liquid	1993		≥ 60°
Used Coolnat	<b></b>		Pi	3560	
SPECIAL HANDLING INSTRUCTIO	ns E	MERGENCY	'RES	PONSE H	UMBER
END USE CODE MI	NI/SR	1-8	00-28	32-9585	
CERTIFICATION This is to certify under penalty of lew that the	shows-named materials	GROSS GALLO	Ne		•
have not been mixed with hazardous wests and described, packaged, marked and labeled, and for transportation according to the applicable rement of Transportation and the U.S. Environment	are in proper condition	CODIAN!		2.85	
x Bot penkel	7-14-96	NET GALLONS		356	
GENERATOR'S SIGNATURE	7-14-96	PRICE PER GAI	LLON _	, 5	50
TRAMSPORTE	R No. 2 SIGNATURE & DATE	FREIGHT		<del>-</del>	
SIGNATURE"	DATE	-	#	142 <	
<b>96-PC</b> 4476		TOTAL		<u> </u>	HARGE
IANIFEST DOCUMENT NO.		CASH			NVOICE FOLLOW)
	r - Receiving Facility	Pink - Transporter	r G'ro	d - Generator	·
		5.4 5.4			

# MO03-RUMR\_ INTERNATIONAL OIL SERVICE

TRANSPORTATION AND RECEIVING MANIFEST

DIV. OF INTERNATIONAL PETROLEUM CORP. STATE CERTIFIED RECYCLER, TRANSPORTER AND COLLECTION FACILITY

		TEN AND OOLE	ECHON PACIENT
EPA I.D. No. FLD 065680613 SO 29-181143	LAD 09209610	MOD 98111 6 LA I.D. No.	4051 GT—186
PLANT CITY, FL 33586 105 S. ALEXANDER ST. (813) 754-1504 TAMPA, FL (813) 229-1739 (800) 282-9585 FAX 1 (813) 754-3789	RECYCLING  USED OIL  USED OIL FILTER  USED ANTIFREE  PETROLEUM CONWATER	14890 (504) : IS (800) : ZE	ORLEANS, LA 70129 INTRACOASTAL DR. 524-9021 523-9071
☐ WILMINGTON, DE 19801 505 S. MARKET ST. (302) 421-9307	Recycling today for a better tomorr	6305 E	MORE, MD 21224 E. LOMBARD ST. 122-2511
	IDENTIFICATI	ON	·····
21154	ORISHIPPER 19		pod <u>5-14-96</u>
CITY S	DRESS	34675 Phone &	13-791-8171
	INFORMATIO	N	
SOURCE TYPE			
CO/A	DESCRIPTION AND CLASSIFICAT Proper Shipping Name, Class a stion Number C.F.R. 172.101, 172.		EXEMPTION FLASH POINT (IN°C) REQUIRED WHEN REQ'D
((Used Oil) Fuel Oil		guld 1993	0 02 3 800
Used CadANT	oup III		13791
SPECIAL HANDLING INSTRUCTIO	NS EME	RGENCY RESP	ONSE NUMBER
END USE CODE MI		1-8 <del>00-2</del> 82	
CERTIFICATION This is to certify under penalty of law that the	above-named materials GR(	OSS GALLONS	
This is to certify under penalty of law tild the have not been sixed with hazardous week and described, packaged, marked and labeled, and for trayleportation according to the applicable or ment of Transportation end the U.S. Epviyance	are in proper condition against the large in proper condition against the Department of the Department of the Protection Agency.	DO ANT	110
X MM CENERATOR'S SIGNATURE	5-14-96 NET	GALLONS 3	05
Tak !		CE PER GALLON	
SIGNATURE		IGHT	
<b>96-PC</b> 7335	TOT	AL	CHARGE (INVOICE
MANIFEST DOCUMENT NO.  White - Original pressige printing pp-2004R 1095 23281-	;;;;;;;	CASH k - Transporter G'rod	TO FOLLOW)
49491	<del>7¥</del>		

# INTERNATIONAL OIL SERVICE

TRANSPORTATION AND RECEIVING MANIFEST

DIV. OF INTERNATIONAL PETROLEUM CORP. CYCLER TRANSPORTER AND COLLECTION FACILITY

EPA I.D. No. FLD 065680613			MOD 981114051				
PLANT CITY, FL 33566 105 S. ALEXANDER ST. (813) 754-1504 TAMPA, FL (813) 229-1739 (800) 282-9585 FAX 1 (813) 754-3789	RECYCLING  USED OIL  USED OIL FILTERS  USED ANTIFREEZE  PETROLEUM CONTACT WATER		LA I.D. No. GT—186  NEW ORLEANS, LA 70129 14890 INTRACOASTAL DR. (504) 254-9021 (800) 523-9071				
☐ WILMINGTON, DE 19801 505 S. MARKET ST. (302) 421-9307	Recycling too for a better tome		BALTIMORE, MD 21224 6305 E. LOMBARD ST. (800) 222-2511				
W 42 4	IDENTIFICA	TION	72491				
MINO 88 MINIONA VILLAGE. Data Shipped 7.24-96							
Clure	RESS ATE	34625 ZIP	Phone 8/3-791-8/71				
INFORMATION							
00/4	DESCRIPTION AND CLASSI Proper Shipping Name, Cl tion Number C.F.R. 172.101.	ese and	UN NO. EXEMPTION FLASH POINT (IN°C) NA NO. RECOURED WHEN REQ'D				
(Used Oil) Fuel Oil Packaging Gn  VSed CoilA N	•	e Liquid	14016 > 60°				
SPECIAL HANDLING INSTRUCTION END USE CODE MI		MERGENCY 1-8	RESPONSE NUMBER 00-282-9585				
CERTIFICATION This is to certify under pensity of law that the have not been mixed with hazardous waste and described, peckaged, married and labeled, and for transportation according to the applicable in ment of Transportation and the U.S. Environm  X  GENERATOR'S SIGNATURE	above-named materials is are properly classified, is are in proper condition routstions of the Depart-	GROSS GALLOI DEDUCTIONS NET GALLONS	165 355				
	7-21-96 ER No. 2 BIGHATURE & DATE	PRICE PER GAI	# 82.50				
96-PC 10280	w - Receiving Facility	CASH Pink - Transporte	CHARGE (INVOICE TO FOLLOW)				

# INTERNATIONAL OIL SERVICE

RECEIVING MANIFEST

DIV. OF INTERNATIONAL PETROLEUM CORP.

STATE CERTIFIED	RECYCLER, TRANS	PORTER ANI	D COI	LECTION !	FACILITY			
EPA I.D. No. FLD 065680 SO 29-181143			MOD 981114051 LA I.D. No. GT—186					
PLANT CITY, FL 333 105 S. ALEXANDER (813) 754-1504 TAMPA, FL (813) 229-1739 (800) 282-9585 FAX 1 (813) 754-3789	ST.  USED OIL USED OIL USED ANTI	<ul> <li>USED OIL FILTERS</li> <li>USED ANTIFREEZE</li> <li>PETROLEUM CONTACT</li> </ul>		NEW ORLEANS, LA 70129 14890 INTRACOASTAL DR. (504) 254-9021 (800) 523-9071				
☐ WILMINGTON, DE 19 505 S. MARKET ST. (302) 421-9307	Hecycling 1	Recycling today for a better tomorrow.			BALTIMORE, MD 21224 6305 E. LOMBARD ST. (800) 222-2511			
	IDENTIFIC	CATION						
11/088 11/4	GENERATOR/SHIPPER  1/5 4  ADDRESS-	19	Date 5		9-96			
CITY CITY	STATE	74625	Phone	813-791	-8171			
	INFORM	ATION						
SOURCE TYPE	- SICONM	ATION						
CO/A	DESCRIPTION AND CLAS Proper Shipping Name, Identification Number C.F.R. 172.1	UN No. or NA No.	EXEMPTION OR NO LABELS REQUIRED	FLASH POINT (IM°C) WHEN REQ'D				
Vsed cou			1993 14	284	> 60*			
END USE COL	DE MINI/SR	EMÉRGENCY 1-8		PONSE N 82-9585	UMBER N			
This is to certify under penalty of have not been mixed with hazardor described, packaged, merked and for transportation according to the	ICATION law that the above-named materials as weste and are properly classified, tabeled, and are in proper condition applicable regulations of the Depart- i. Environmental Protection Agency.	GROSS GALLO	NS	110				
CEMERATOR'S SIGNATURE	14/15 9-19-96 DATE	NET GALLONS		260	<del></del>			
Kuch	TRANSPORTER No. 2 SIGNATURE & DATE	PRICE PER GA	LLON _					
<b>96-PC</b> 13	718	TOTAL	#		HARGE NVOICE			
MANIFEST DOCUMENT NO. White - Origina prestige printing pp-2004R 10/95	Yellow - Receiving Facility	CASH: Pink - Transports	r G'n		FOLLOW)			