Department of Environmental Protection

Jeb Bush
Governor

Southwest District
3804 Coconut Palm Drive
Tampa, Florida 33619

David B. Struhs
Secretary

June 4, 2001

IPC/Magnum
105 South Alexander Street
Plant City, FL 33566

Attn: Garry R. Allen

RE: IPC/Magnum
EPA ID# FLD 065 680 613
Warning Letter #242089
Hillsborough County

Dear Mr. Allen:

A review of the file for the above referenced case indicates that the violations cited in the Warning Letter have been corrected. Based on the information you provided in your May 23, 2001, letter, violation no. 2, the failure of IOS's transporters to notify the Department's District Office of any refusal to pick-up used oil, was deleted. This enforcement action is now closed.

Your cooperation in resolving this matter is greatly appreciated. If you have any questions please call Jim Dregne at (813) 744-6100, extension 410.

Sincerely,

William Kutash
Program Administrator
Division of Waste Management

WK/jmd

cc: Steve Ray, HWR Section
Kelley Boatwright, Hillsborough County EPC
Compliance File

Florida Department of

Memorandum Environmental Protection

ENFORCEMENT/COMPLIANCE COVER MEMO

TO: ☐ Deborah A. Getzoff, Director of District Management
☒ William Kutash, Environmental Administrator
☐ Office of General Counsel, ATTN:_____

THRU SCT Stanley Tam, Professional Engineer II
Elizabeth Knauss, Environmental Manager
Al Gephart, Engineer IV

FROM: Jim Dregne, Environmental Specialist III

DATE: May 25, 2001

FILE NAME: **IPC/Magnum** PROJECT #: 242089

PROGRAM: Hazardous Waste COUNTY: Hillsborough

TYPE OF DOCUMENT:

☐ draft or ☐ final	☐ NOV	☐ Consent Order
☐ Final Order	☐ Case Report	☐ Penalty Authorization
☐ Warning Letter	☒ Other **Case Closed Letter**	

DESCRIPTION OF VIOLATIONS: IPC/Magnum generates, transports, markets and processes used oil and generates and transports used oil filters. IPC/Magnum also handles used antifreeze. During this routine annual inspection, inspectors found three violations. Documentation of annual training could not be located for every employee. Several 5-gallon buckets were not labeled "Used Oil". Company drivers were not notifying the Department of the refusal to pick-up used oil from generators.

SUMMARY OF CORRECTIVE ACTIONS: The facility has corrected each violation and has returned to compliance.

PENALTY SUMMARY:

Potential for Harm: N/A Extent of Deviation: N/A

Penalty Amount: 0.00 Expenses: 0.00

TOTAL PENALTY AMOUNT: 0.00 ☐ TO SECRETARY

IPC/Magnum
an EarthLiquids Company

105 S. Alexander Street
Plant City, FL 33566
(800)282-9585
(813)754-1504
(813)754-3789 Fax

May 23, 2001

Deborah A. Getzoff Director of District Management
Department of Environmental Protection, Southwest District
3804 Coconut Palm Drive
Tampa, Florida 33619

Re: International Petroleum Corporation
Warning Letter 242089
EPA ID# 065 680 613

Dear Ms. Getzoff:

This letter responds to the FDEP Warning Letter # 242089 of March 28, 2001, in which International Petroleum Corporation ("IPC") was notified of three possible violations of the Florida Statutes and Rules. As you requested, we have met with Jim Dregne several times to discuss this matter.

The alleged violations listed in the Inspection Report, attached to your letter, are responded to as follows:

1. **40 CFR 279.54(f)(1) Failure to properly label containers of used oil with the words "Used Oil".**
   As noted, a single used oil container in the lab was not properly labeled, which was immediately corrected during the inspection.

2. **62-710.510(2) F.A.C. Failure of IPC to notify the Department's District Office of any refusal to pick-up used oil.**
   On page 2, of the Inspection Report, it is stated that a "document review of used oil shipments arriving at the facility between May 10, 2000 and September 29, 2000, showed fourteen shipments that had used oil exceeding 1000 PPM halogen content. Six of the fourteen shipments were successfully rebutted."
   Mr. Dregne identified the fourteen shipment / samples, which are responded to as follows:

   1. *Jeff/rear compartment/May 16,2000/halogens 1133 PPM– successfully rebutted.

2.**Williams Waste Oil/rear compartment /May 18, 2000 halogens 1522 PPM.
3.**Highlands/rear compartment/ May 26, 2000/halogens 1853 PPM.
4. **Williams Waste Oil/Rear compartment/June 1, 2000/halogens 1853 PPM.
5.**Williams Waste Oil/front & rear compartments/June 16, 2000/halogens 2032 PPM, 2314 PPM.
6. Town House Auto/July 5, 2000/halogens 43591 PPM.
7. *Albert/rear compartment/July 31, 2000/halogens 1142 PPM.
8. **Williams Waste Oil/front compartment/August 4, 2000/halogens 1190 PPM.
9. *Kevin/front compartment/August 25, 2000/halogens 1381 PPM.
10. *Darin/front compartment/August 25,2000/halogens 6129 PPM.
11. Chris Markey/August 28, 2000/halogens 27978 PPM.
12. *RTMX/September 19, 2000/halogens 2615/1663 PPM.
13. Jerry/April 17, 2000/halogens 4173 PPM. The load of oil was returned to Sorenson Chevrolet at 1875 U.S. Highway 27, LakeWales, Florida where the oil was drummed up, tanks were cleaned and 20 drums of waste were picked up by Freehold Cartage and delivered to Fisher Industrial services in Glencoe, Alabama for fuels blending.
14. *Kevin/September 16, 2000/halogens 1154 PPM.

As indicated by the Inspection Report, six of the fourteen samples with greater than 1000 PPM halogen content were successfully rebutted and were cleared for acceptance at the facility. Thus no report to the District Office was required. Those six samples are identified above with an asterisk (*).

Of the eight remaining samples listed, five of them were shipped by registered independent used oil transporters *not* affiliated with IPC. Under rule 62 – 710.510 (2), it is the transporter's duty to notify the District office of shipment refusals. We will continue to remind independent transporters of that duty but we cannot be responsible for their failure to do so. Those five samples by independent used oil transporters are identified above with a double asterisk (**).

The three remaining samples are specifically addressed as follows:

#6 Town House Auto- a *sample only* of a drum of "paint waste" that our driver collected hoping to pass it on to our salesman who would broker it as hazardous waste. It was not, and never intended to be picked up as used oil. Therefore it is not a violation.

#11 Chris Markey –a *sample only* of water and cutting oil – brought in for screening by an independent broker. Therefore it is not a violation.

#13 Jerry – Load returned to generator and shipped in drums as hazardous to Fisher Industrial services. Therefore it was properly disposed and not a violation.

3. **Specific Condition to V.2. Failure to provide annual refresher training to facility personnel.**
   Attached are the attendance sheets showing completion of the refresher training.

As indicated, we do not believe IPC violated rule 62 –710.510 (2), as alleged. The other two alleged violations were promptly addressed or corrected.

The FDEP inspection was, however, thoroughly and professionally done, and we appreciate Mr. Dregne's courtesy in discussing the results with us. We hope that this response closes this warning letter, but please contact me if anything further is required. Thank you.

Sincerely,

Garry R. Allen
President / IPC

TRAINING LOG

EMPLOYER NAME	IPC / Magnum			
LOCATION Street	105 S. Alexander	City Plant City	State FL	Zip Code 33566
Instructor	David Pomella Soap	Date of Training 5-8-01	Subject	HAZ-COM

The employees listed have satisfactorily participated and been tested per Regulation/Company training requirements

EMPLOYEE NAME	EMPLOYEE NO.	DEPARTMENT	EMPLOYEE SIGNATURE
Raymond Blue	266-88-1009	YARD	Raymond Blue
Leonard Simmons	176-56-0519		Leonard Simmons
James Matterson	592-10-0305		James Matterson Jr
Alfredo Gomez	078-44-7755	Transport driver	Alfredo Gomez
James Goad	866-57-3484	# Driver	James Goad
Robert Cancholo	261-31-3445	DRIVER	Robert Cancholo
Anthony L Polk	263-53-3405	mech	Anthony L Polk
Jerry D. Martin	372-52-9721	YARD?	Jerry D. Martin
Albert Davila	334	Street truck	Albert Davila
Kevin Godfrey	264-73-1135	Filter Driver	Kevin Godfrey
Mike Bowers	595-30-2402	Driver?	Mike Bowers
Kevin Chancey	265-81-6489	DRIVER	Kevin Chancey
Jeff Edlin	332	DRIVER	Jeff Edlin
Darrin L. James	266-99-4849	Driver	Darrin L. James
Tim Kemper	289-74-8163	DRIVER	Tim Kemper
Jeff Wenglarski	266-74-9593	Driver	Jeff Wenglarski

TRAINING LOG

EMPLOYER NAME IPC/Magnum			
LOCATION Street 105 S. Alexander	City Plant City	State FL	Zip Code 33566
Instructor David Pomella	Date of Training 5-7-01	Subject HAZ-COM	

The employees listed have satisfactorily participated and been tested per Regulation/Company training requirements

EMPLOYEE NAME	EMPLOYEE NO.	DEPARTMENT	EMPLOYEE SIGNATURE
Robert BANKER	347	Transport	
James Reynolds	38	Transport	
Jerry Chambers	329	ST. Truck	
William S. Pilcher Sr	331	ST. Truck	
Larry E. Davis	338	VAC Truck	
~~Johnnie Collins~~	~~337~~	~~Vac Truck~~	~~Glyn Murphy~~
Glyn Murphy	327	Vac Truck	Glyn Murphy
Jesse Giddens		Refinery Operator	Jesse Giddens
Bill Bridges		Refinery OP	Bill Bridges
Michael Wolfe	302	Management	
~~Jeff Dolin~~	~~332~~		

TRAINING LOG

EMPLOYER NAME	IPC / Magnum		
LOCATION Street: 105 S. Alexander Street	City: Plant City	State: FL	Zip Code: 33566
Instructor: David Pomella	Date of Training: 5-4-01	Subject: Haz-Comm	

The employees listed have satisfactorily participated and been tested per Regulation/Company training requirements

EMPLOYEE NAME	EMPLOYEE NO.	DEPARTMENT	EMPLOYEE SIGNATURE
T. Johnson	08596	Maintance	
Alan Stinson	302	Vac. Svc.	
Rick Mobley	305	Operations	
Steve Harris	304	Yard	
R. Bear	311	Transportation	
A-Hazen		Main	
Dave Branch	007	Refinery	
Anthony J. Piotrowski		Environmental	
Garry R. Allen	303	Management	

TRAINING LOG

EMPLOYER NAME IPC / Magnum			
LOCATION Street	City	State	Zip Code
Instructor David Pomella	Date of Training 5-15-01	Subject HAZ-COM	

The employees listed have satisfactorily participated and been tested per Regulation/Company training requirements

EMPLOYEE NAME	EMPLOYEE NO.	DEPARTMENT	EMPLOYEE SIGNATURE
Tiffini Griffin		Cab	[signature]
Joseph Richter		Drive	[signature]

TRAINING LOG

EMPLOYER NAME IPC / Magnum

LOCATION Street 105 S. Alexander street | City Plant City | State FL | Zip Code 33566

Instructor David Pomella | Date of Training 5-14-01 | Subject HAZ-COM

The employees listed have satisfactorily participated and been tested per Regulation/Company training requirements

EMPLOYEE NAME	EMPLOYEE NO.	DEPARTMENT	EMPLOYEE SIGNATURE
ANDREW D BEATY		OPERATOR	Andrew D Beaty
Daphne Moore		Lab	Daphne Moore
Alfred M Ciccarelli		Oil Drwer	Alfred M Ciccarelli
Richard W. Embrey		VAC	Richard W Embrey
Kevin A Walters	337	Yard	Kevin A Walters
MARION W. HAMPTON III IV		YARD.	Marion W Hampton III IV
Albert Bruce		YARD	Albert Bruce
Juan Blanco		OIL LAB	Juan Blanco
RICHARD EWING		MANAGEMENT	Richard Ewing
Tiffini Griffin		Lab	Tiffini Griffin

Florida Department of

Environmental Protection

Facsimile Cover Sheet

To: Garry Allen
Company: Earth Liquid IPC/Magnum
Phone: (813) 754-1504
Fax: (813) 754- 6174

From: Jim Dregne
Company: DEP Hazardous Waste Section
3804 Coconut Palm Drive
Tampa, Florida 33619
Phone: (813) 744-6100, extension 410
or S.C. 512-1042, extension 410
Fax: (813) 744-6125

Date: May 16, 2001
Pages including this cover page: 2

Comments: During my inspection of records on October 12, 2000, I found the following shipments of used oil that were delivered or were attempted deliveries of used oil that had halogen contents above 1000 ppm.

1. **Jeff/rear compartment/May 16, 2000/halogens 1133ppm.
2. Williams Waste Oil/rear compartment/May 18, 2000/halogens 1522ppm.
3. Highlands/rear compartment/May 26, 2000/halogens 2358 ppm.
4. Williams Waste Oil/rear compartment/June 1, 2000/halogens 1853ppm.
5. Williams Waste Oil/front & rear compartments/June 16, 2000/halogens 2032ppm, 2314ppm.
6. Town House Auto/July 5, 2000/halogens 43591 ppm.
7. **Albert/rear compartment/July 31, 2000/halogens 1142 ppm.

8. Williams Waste Oil/front compartment/August 4, 2000/halogens 1190 ppm.
9. **Kevin/front compartment/August 25, 2000/halogens 1381 ppm.
10. **Darin/front compartment/August 25, 2000/halogens 6129 ppm.
11. Chris Markey/August 28, 2000/halogens 27978 ppm.
12. **RTMX/September 19, 2000/halogens 2615/1663 ppm.
13. Jerry/April 17, 2000/halogens 4173 ppm.
14. **Kevin/September 16, 2000/halogens 1154 ppm.

** Successfully rebutted.

Florida Department of

Environmental Protection

Facsimile Cover Sheet

To: Garry Allen
Company: Earth Liquid IPC/Magnum
Phone: (813) 754-1504
Fax: (813) 754- 6174

From: Jim Dregne
Company: DEP Hazardous Waste Section
3804 Coconut Palm Drive
Tampa, Florida 33619
Phone: (813) 744-6100, extension 410
or S.C. 512-1042, extension 410
Fax: (813) 744-6125

Date: May 11, 2001
Pages including this cover page: 5

Comments: I discussed the issue of used oil with greater than 1000 ppm halogens with Stanley and Beth. The regulation seems to be clear on this situation. If the oil has greater that 1000 ppm halogens, then the oil must be assumed to be hazardous and managed as such. The only exception is if it can be rebutted. If the oil is between 1000 ppm and 4000 ppm halogens, and it can be successfully rebutted, then it can be managed as on-spec used oil. If the oil is greater than 4000 ppm halogens and can be rebutted, then it can be managed as off-spec used oil.

I also looked through your permit and don't see anything that would prevent you from accepting off-spec used oil.

Sorry that I couldn't help you out. I guess we are going to have a lot of hazardous used oil until we can get people educated about the Gunk brake cleaner. Also, make sure these generators are not conditionally exempt. Many generators register as small quantity generators and are in fact CESQG's.

Department of Environmental Protection

G528

Lawton Chiles
Governor

Twin Towers Office Building
2600 Blair Stone Road
Tallahassee, Florida 32399-2400

Virginia B. Wetherell
Secretary

December 8, 1995

W.A. Oster
Lieutenant Commandar
Department Of The Navy
Coastal Systems Station Dahlgren Division
Naval Surface Warfare Center
6703 West Highway 98
Panama City, FL 32407-7001

Re: Interpretation of Used Oil Management Regulations

Dear Mr. Oster:

The Florida Department of Environmental Protection (FDEP) Hazardous Waste Regulation Section has received your letter dated April 18, 1995, requesting interpretation of used oil management regulations. Please accept my apology for the delay in our response to your correspondence.

As regards to the first three items mentioned in your letter, we would like to clarify some of the interpretations. According to used oil regulations (40 CFR Part 279), used oil when tested with a Dexsil chlorine detection field kit, may be handled as an on-specification used oil when the test results show less than 1000 ppm of total halogen content and other constituent property levels of 40 CFR Part 279.11 Table 1 are not exceeded. In this case, no rebuttal is necessary, and the used oil fuel may be burned in an on-specification unit if used oil meets other specifications.

When the test results show between 1000 ppm and 4000 ppm of total halogen content, the used oil is presumed to have been mixed with hazardous waste. This presumption needs successful rebuttal for you to manage the waste as used oil. In this case, with successful rebuttal, the used oil fuel may be burned in an on-specification unit if the used oil meets other specifications.

Used oil that contains more than 4000 ppm of total halogen content, is also presumed to have been mixed with hazardous waste. However, even if this presumption is successfully rebutted, the used oil must be handled as an off-specification used oil fuel. In this case, the used oil fuel must be burned in an off-specification unit regulated under 40 CFR Part 279, Subpart G, or undergo further processing to be burned in an on-specification unit. If used oil is not successfully rebutted, the used oil must be handled as hazardous waste.

Our Section agrees that the rebuttable presumption should consist of laboratory analysis for the halogenated volatile and semi-volatile organic compounds of 40 CFR part 261 Appendix VIII. It should be conducted using EPA methods 8010A and 8270 respectively.

Finally, coming to the last three items of your letter, our Section completely agrees with your interpretation of the used oil regulations.

If you have any questions please call Mike Redig, Subra Putcha or Mahnaz Massoudi in the Hazardous Waste Regulation Section at (904) 488-0300.

Sincerely,

Satish Kastury
Environmental Administrator
Hazardous Waste Regulation Section

SK/mm

CC: Subra Putcha, FDEP-HWR
Susan Horlick, FDEP-HWR
Rick Neves, FDEP-HWM
Diana Coleman, FDEP-OGC
District Waste Program Administrators
District Technical Committee Members
Mike Clayton, Department of the Navy
Reading File

DEPARTMENT O
COASTAL SYSTEMS STATION
NAVAL SURFACE WAF
6703 WEST HIG
PANAMA CITY FL

Post-it™ brand fax transmittal memo 7671	# of pages ▸ 2
To Michael Redig	From Mike Clayton
Co. FDEP	Co. COASTAL SYSTEMS STATION
Dept.	Phone # (904) 235-5859
Fax # (904) 921-8018	Fax # (904) 234-4774

18 APR 1995

Florida Department of Environmental Protection
Attn: Mr. John Fusco 444-8360
160 Governmental Center
Pensacola, FL 32501-5794

Dear Mr. Fusco:

The purpose of this letter is to recapitulate your discussion with Mr. Mike Clayton on 24 March 1995 concerning interpretations of waste oil management regulations. The following is our understanding of the items discussed:

(1) Used oil, when tested with a Drexil chlorine detection field kit, may be handled as an on-specification used oil when the tests results are <1000 ppm and the constituent and property levels of 40 CFR 279.11 Table 1 are not exceeded. If a level is exceeded, the used oil becomes an off-specification used oil and must be handle in accordance with 40 CFR 279 Subpart G.

(2) Used oil which has a Drexil test reading between 1000 ppm and 4000 ppm, is considered a hazardous waste unless refuted by the rebuttable presumption of 40 CFR 279.10. The rebuttable presumption should consist of laboratory analysis for the halogenated volatile and semi-volatile organic compounds of 40 CFR 261 Appendix VIII. It should be conducted using EPA methods 8010A and 8270 respectively. If the total halogenated hydrocarbon level is found to be less than 1000 ppm, then the used oil may be handled as an on-specification used oil provided it is below the specification levels of 40 CFR 279.11 Table 1. If the total halogenated hydrocarbon level is found to be above 1000 ppm it shall be handled as an off-specification used oil. If the used oil fails the rebuttable presumption it may be handled/burned as a Hazardous Waste Fuel for energy recovery.

(3) Used oil which has a Drexil test reading >4000 ppm can not be refuted by use of the rebuttable presumption. This oil must be managed as an off-specification used oil when burned for energy recovery in accordance with 40 CFR 279 Subpart G.

(4) Used oil analysis for total metals and ignitability, (required to classify used oil as on/off specification in accordance with 40 CFR 279 Subpart B) should be conducted quarterly the first year and annually thereafter if the results have not significantly varied.

(5) Used oil which exhibits a Flash Point less than 100 degrees Fahrenheit, as determined by the ignitability test, must be managed as an "Off-Specification used oil". Used oil which

exhibits a flash point greater than 100 degrees Fahrenheit would be managed as an "On-Specification used oil".

(6) TCLP analysis is only required for oil waste or oily sludge destined for disposal versus energy recovery. We understand that the full TCLP analysis is not required, but that we are to test for the constituents most likely to be in waste oils, particularly the heavy metals. However, if we suspect other TCLP toxics may have been added to the oily waste we will test for these as well.

If you concur with our understanding of the regulatory interpretations as outlined above, we would like you to return a signed copy of this letter to us. We would welcome any written comments that you may attach to supplement or provide further clarification of these issues.

Sincerely,

W. A. OSTER
Lieutenant Commander, U.S. Navy
By direction of
the Commanding Officer

Signature_____ Date_____

Department of
Environmental Protection

Jeb Bush
Governor

Southwest District
3804 Coconut Palm Drive
Tampa, Florida 33619

David B. Struhs
Secretary

April23, 2001

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

RE: Warning Letter #242089
International Petroleum Corporation
FLD 065 680 613, Hillsborough County

Dear Mr. Allen:

The Department has received your letter dated April 9, 2001, requesting a sixty-day extension for responding to the referenced Warning Letter. The Department has approved an extension until May 24, 2001.

A revised page 3 to the September 25, 2000, inspection report has been provided at enclosure one. If you have any question please call me at (813) 744-6100, extension 410.

Sincerely,

James M. Dregne
Environmental Specialist III
Division of Waste Management

JMD/jd

Enclosure as

cc: Compliance File

or is further blended for, its customers. Water distilled from the used oil is pumped to tanks SKW and SKE.

Crushed and uncrushed used oil filters are received in 55-gallon drums and stored in a drum storage area adjacent to the maintenance building. IPC had discontinued crushing filters at the Plant City facility. The uncrushed filters are shipped to Fort Pierce for crushing. *Following crushing, the filters are smelted at U.S. Foundry in Medley, Florida.* At the time of the inspection, drums of used oil filters were sealed and properly labeled.

Empty 55-gallon drums are collected in a drum washing area located at the *East* end of the product oil tank farm. The drums are pressure washed with water. Diesel fuel or kerosene is used to "cut" the oil. The oily waste from the drum cleaning operation drains to a sump next to the wash area. The oily waste is then pumped from the sump, via aboveground piping, to T-630. If the waste generated at the wash area is water, a valve can be used to route the wastewater to tanks SKE and SKW.

Wastewater, including petroleum contact water (PCW), industrial wastewater, rainwater collected in secondary containment areas and water distilled from the re-refining of used oil is accumulated in two 47,000 gallon aboveground storage tanks SKE and SKW. The wastewater is treated in a pre-treatment system consisting of gravity separation, chemical treatment, flocculation, coagulation and dissolved air flotation. Any oil recovered from the tanks by gravity separation or dissolved air flotation is pumped to T-630 for re-refining. Following pre-treatment of the wastewater, the water is discharged to the Plant City POTW.

Used antifreeze picked-up by IOS drivers is placed in a separate compartment in the tanker trucks. When the truck arrives at IPC the used antifreeze is transferred to T-630 for processing with the used oil or it may be pumped to tank 20V (or alternate tanks) for recycling. The destination of the incoming used antifreeze is dependent on the glycol content of the antifreeze. Antifreeze containing greater then 30% glycol (high value glycol) typically goes to tank 20V. IPC stores the antifreeze in tank 20V until it has enough to fill a rail car. Rail cars of used antifreeze are shipped to the Magnum – *US Filter.* Antifreeze with low glycol value normally goes to *Ft. Pierce or* T-630. According to Mr. Allen, IPC requires a hazardous waste determination be made prior to the acceptance of any used antifreeze that is not destined for recycling. A separate waste determination is necessary for each facility. A review of IPC's records showed that each client providing antifreeze to IPC had a TCLP analysis performed for four contaminates of concerns; benzene, lead, trichloroethene and tetrachloroethene.

Solid waste managed at the facility includes oily solid waste generated by IPC and its clients. Oil contaminated solid waste is picked-up by IOS as a service to its clients. The solid waste handled by IPC includes filter basket debris, sludge absorbents, contaminated soil and rags. The waste is managed as non-hazardous waste. The solid wastes are bulked and sent to an approved thermal facility or a licensed landfill for disposal.

A large amount of the solid waste generated by IPC comes from the cleaning of lint traps and sumps. The Company has done extensive testing of these waste streams. The analyses from these tests indicate that the waste is non-hazardous. A review of the records at IPC for the previous twelve months showed that the lint trap and sump waste had been managed properly.

Before the processed oil is shipped off-site, a composite sample is collected from tank 552 using the All-levels sampling procedure or, depending on tank level, a sample may be drawn from a six-foot high sample port. The sample is taken to the IES on-site laboratory for analysis. If the analytical results indicate that the processed oil meets the on-spec criteria, the oil is released for shipment or further blending. Re-refined oil may be blended or stored in tanks 1, 2, 3, 4, 5, 6, 7, 8, 9, 10, 11, 12, 20V or 24K

or is further blended for, its customers. Water distilled from the used oil is pumped to tanks SKW and SKE.

Crushed and uncrushed used oil filters are received in 55-gallon drums and stored in a drum storage area adjacent to the maintenance building. IPC had discontinued crushing filters at the Plant City facility. The uncrushed filters are shipped to Fort Pierce for crushing. *Following crushing, the filters are smelted at U.S. Foundry in Medley, Florida.* At the time of the inspection, drums of used oil filters were sealed and properly labeled.

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Used antifreeze picked-up by IOS drivers is placed in a separate compartment in the tanker trucks. When the truck arrives at IPC the used antifreeze is transferred to T-630 for processing with the used oil or it may be pumped to tank 20V (or alternate tanks) for recycling. The destination of the incoming used antifreeze is dependent on the glycol content of the antifreeze. Antifreeze containing greater then 30% glycol (high value glycol) typically goes to tank 20V. IPC stores the antifreeze in tank 20V until it has enough to fill a rail car. Rail cars of used antifreeze are shipped to the Magnum – *US Filter.* Antifreeze with low glycol value normally goes to *Ft. Pierce or* T-630. According to Mr. Allen, IPC requires a hazardous waste determination be made prior to the acceptance of any used antifreeze that is not destined for recycling. A separate waste determination is necessary for each facility. A review of IPC's records showed that each client providing antifreeze to IPC had a TCLP analysis performed for four contaminates of concerns; benzene, lead, trichloroethene and tetrachloroethene.

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Before the processed oil is shipped off-site, a composite sample is collected from tank 552 using the All-levels sampling procedure or, depending on tank level, a sample may be drawn from a six-foot high sample port. The sample is taken to the IES on-site laboratory for analysis. If the analytical results indicate that the processed oil meets the on-spec criteria, the oil is released for shipment or further blending. Re-refined oil may be blended or stored in tanks 1, 2, 3, 4, 5, 6, 7, 8, 9, 10, 11, 12, 20V or 24K

IPC/Magnum
an EarthLiquids Company

105 S. Alexander Street
Plant City, FL 33566
(800)282-9585
(813)754-1504
(813)754-3789 Fax

April 9, 2001

James Dregne
Department of Environmental Protection
Southwest District
3804 Coconut Palm Drive
Tampa, Florida 33619

Re: Warning Letter #242089

Dear Mr. Dregne:

Please accept this letter as our request for a sixty (60) day extension on responding to your Warning Letter dated March 28, 2001. We will need more time on answering your recommended corrective actions.

Yours truly,

Garry R. Allen
President IPC

FLORIDA DEPARTMENT OF ENVIRONMENTAL PROTECTION
3804 Coconut Palm Drive
Tampa, FL 33619-8318

FAX

Date: 4/4/01
Number of pages including cover sheet: 2

To:
Garry R. Allen
IPC/Magnum

Phone: 229-1739
Fax phone: 754-6174
CC:

From:
Jim Dregne
FDEP

Phone: (813) 744-6100
Fax phone: (813) 744-6125

REMARKS: ☐ Urgent ☐ For your review ☐ Reply ASAP ☐ Please comment

Garry:
Here are the names of the 17 people that we did not find any training (up-to-date) in the training file.

Jim

IPC

ANNUAL HAZARD COMMUNICATION TRAINING

THOSE ON ORGANIZATION CHART THAT WERE NOT IN TRAINING FILE

D. BRANCH (E.C. #4)
A. BEATY
J. HIDDENS
T. JOHNSON
M. HAMPTON
J. CALLINS
A. BRUCE
F. SMITH
A. STINSON
D. JAMES
T. KEMPER
J. HARTZOG
J. RICHTER
J. REYNOLDS
R. EMBREY
GARRY ALLEN (E.C. #1)
RICK MOBLEY (E.C. #3)

* E.C. = EMERGENCY COORDINATOR

THOSE THAT RECEIVED ANNUAL TRAINING THAT WERE NOT ON ORGANIZATIONAL CHART

LONNIE JONES
JERRY C.
CONI BROOKS
RAYMOND BLUE
ROBBY YARBROUGH
BETH WITON

Department of Environmental Protection

Jeb Bush
Governor

Southwest District
3804 Coconut Palm Drive
Tampa, Florida 33619

David B. Struhs
Secretary

March 28, 2001

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

RE: International Petroleum Corporation
EPA ID# FLD 065 680 613
Warning Letter #242089
Hillsborough County

Dear Mr. Allen:

The purpose of this letter is to advise you of possible violations of law for which you may be responsible, and to seek your cooperation in resolving the matter. A hazardous waste program field inspection conducted on September 25, 2000, indicates that violations of Florida Statutes and Rules may exist at the above referenced facility. Department of Environmental Protection personnel made observations described in the attached inspection report. Section 10 of the report lists a summary of alleged violations of Department Rules.

Section 403.727, Florida Statutes (F.S.) provides that it is a violation to fail to comply with rules adopted by the Department. The activities observed during the Department's field inspection and any other activities at your facility that may be contributing to violations of Florida Statutes or Department Rules should cease.

You are requested to contact Jim Dregne at (813) 744-6100, extension 410, within fifteen (15) days of receipt of this Warning Letter to arrange a meeting to discuss this matter. The Department is interested in reviewing any facts you may have that will assist in determining whether any violations have occurred. You may bring anyone with you to the meeting that you feel could help resolve this matter. Alternatively, you may respond in writing within thirty (30) days with documentation that all alleged violations have been corrected. Please see Section 11 of the inspection report for a list of recommended corrective actions.

Please be advised that this Warning Letter is part of an agency investigation, preliminary to agency action in accordance with Section 120.57(4), F.S. If your fail to respond and document a return to compliance within 90 days, under the Department's agreement with the United States Environmental Protection Agency (EPA), you may be designated as significantly out of compliance. This could result in issuance of a formal administrative complaint or "Notice of Violation" (NOV) and assessment of civil penalties if the case is not resolved within 150 days of the attached inspection report. We look forward to your cooperation in completing the investigation and resolution of this matter.

Sincerely yours,

Deborah A. Getzoff
Director of District Management
Southwest District

DAG/jmd

Enclosure

cc: Steven Ray, HWR Section
Kelley Boatwright, Hillsborough EPC
Compliance File

Department of Environmental Protection

Jeb Bush
Governor

Southwest District
3804 Coconut Palm Drive
Tampa, Florida 33619

David B. Struhs
Secretary

HAZARDOUS WASTE INSPECTION REPORT

1. **INSPECTION TYPE:** ☒Routine ☐Complaint ☐Follow-Up ☒Permitting ☐Pre-Arranged

FACILITY NAME: International Petroleum Corporation **DEP/EPA ID #:** FLD 065 680 613

STREET ADDRESS: 105 South Alexander Street; Plant City, FL 33566

MAILING ADDRESS: 105 South Alexander Street; Plant City, FL 33566

COUNTY: Hillsborough **PHONE:** (813) 754-1504 **DATE:** 09/25/00 **TIME:** 9:35 am

NOTIFIED AS: ☐ N/A

- ☐ non-handler
- ☐ CESQG (<100 Kg per month)
- ☐ SQG (100 Kg - 1000 Kg per month)
- ☐ LQG (>1000 Kg per month)
- ☒ transporter
- ☐ transfer facility
- ☐ interim status TSDF
- ☐ permitted TSDF
- ☐ unit types:
- ☐ exempt treatment facility
- ☒ used oil: Processor, Transporter, Marketer
- ☒ used oil filter: Processor, Transporter

CURRENT STATUS:

- ☐ non-handler
- ☐ CESQG (<100 Kg per month)
- ☐ SQG (100 Kg - 1000 Kg per month)
- ☐ LQG (>1000 Kg per month)
- ☒ transporter
- ☐ transfer facility
- ☐ interim status TSDF
- ☐ permitted TSDF
- ☐ unit types:
- ☐ exempt treatment facility
- ☒ used oil: Processor, Transporter, Marketer
- ☒ used oil filter: Processor, Transporter

2. **APPLICABLE REGULATIONS:**

☐ 40 CFR 261.5	☒ 40 CFR 262	☒ 40 CFR 263	☐ 40 CFR 264
☐ 40 CFR 265	☐ 40 CFR 266	☐ 40 CFR 268	☐ 40 CFR 273
☒ 40 CFR 279	☒ 62-710, FAC	☐ 62-737, FAC	☐ 62-740, FAC

3. **RESPONSIBLE OFFICIAL:**

Garry Allen - President

4. **INSPECTION PARTICIPANTS:**

Al Gephart - FDEP
Roger Evans – FDEP
Jim Dregne - FDEP
Stanley Tam - FDEP
Garry Allen - IPC
Rick Mobley – IPC

5. **LATITUDE/LONGITUDE:** 28°00'30"/ 82°08'00"

6. **SIC Code:** 2999

7. **TYPE OF OWNERSHIP:** PRIVATE FEDERAL STATE COUNTY MUNICIPAL

8. **PERMIT #:** 93015-HO06-001 **ISSUE DATE:** 08/20/98 **EXP. DATE:** 08/20/03

9. PROCESS DESCRIPTION:

International Petroleum Corporation (IPC) is a used oil processor and marketer of on-spec used oil. IPC produces a fuel oil that is equivalent to No. 5 Fuel Oil and a flotation oil for the phosphate industry. IPC has been at this location since 1984 and is currently employing approximately 60 people. IPC shares the site with its subsidiary company, International Oil Service (IOS) and its affiliate, International Environmental Service (IES). The eight-acre site contains an oil re-refinery facility, an industrial wastewater pre-treatment facility, storage tanks, maintenance garage and two administration buildings. According to Mr. Allen, the facility does not intentionally accept off-spec used oil or hazardous waste. On occasion, IPC may act as a broker for the disposal of hazardous waste for some clients. The hazardous waste that is brokered is not transported by IPC, but is transported directly from the generator to the disposal facility.

The IPC tank farm consists of 27 aboveground storage tanks. Seventeen (17) of these tanks (approximate capacity of 1,397,600 gallons) are used to store used and re-refined used oil. The tanks have secondary containment consisting of concrete walls and floor designed to contain oil spills. Overall, the containment areas were clean and in good condition.

Used oil and petroleum contaminated products, including off-spec virgin fuels, are processed into an on-spec used oil fuel using a multi-stage distillation system. Water that is distilled from the used oil is pretreated in the company's wastewater treatment plant prior to being discharged to the Plant City POTW. The light distillates from the distillation process are burned on-site in the Born hot oil furnace to provide thermal energy for the re-refinery process. The Born furnace is operated under a FDEP Air Permit. The containment in this area was clean and in good condition.

The majority of the used oil, used oil filters and oily wastes are brought into the facility by IOS tanker trucks owned by IPC, common carriers, independent oil transporters and tanker rail cars. A rail spur is located along the south side of the facility. Used oil delivered by rail only stays at the facility for a few days depending on the time it is staged at the spur. The spur has a small containment curb running parallel to the rails that provides some secondary containment capacity for small spills and leaks for rail cars staged at the spur.

Used oil arriving at the facility is sampled and analyzed in the facility's on-site state certified lab, operated by IES, using a Dohrmann MC120/130 analyzer before it is off loaded from any truck or rail car. If the analysis indicates the total halogen concentration is less than 1,000 ppm, the used oil is accepted and pumped into the tank farm. Used oil containing 1000 ppm or more total halogens is presumed to be hazardous and is not accepted by IPC. A document review of used oil shipments arriving at the facility between May 10, 2000 and September 29, 2000, showed fourteen shipments that had used oil exceeding 1000 ppm halogen content. Six of the fourteen shipments were successfully rebutted. IOS transporters did not notify the Department of any used oil shipment refusals. This is in violation of **62-710.510(2) F.A.C.**

Used oil, oily water or used antifreeze from tanker trucks are first pumped through a 40-mesh filter basket to remove silts and other solids before they enter any tank in the tank farm. The filtered material is pumped to a 630,000-gallon aboveground storage tank, T-630. The tank was properly labeled, "Used Oil". Used oil from tank T-630 is fed by aboveground piping to the processing area where it is processed through an atmospheric distillation column and a vacuum distillation column. The re-refined oil is then transferred to tank 30KV. Normally, the re-refined oil in tank 30KV is transferred to tank 552 once per day. The processed oil in tank 552 is sampled and tested to determine if the processed used oil meets the used oil fuel specifications. If the used oil meets the specifications, it is released by IPC for shipment to,

or is further blended for, its customers. Water distilled from the used oil is pumped to tanks SKW and SKE.

Crushed and uncrushed used oil filters are received in 55-gallon drums and stored in a drum storage area adjacent to the maintenance building. IPC had discontinued crushing filters at the Plant City facility. The uncrushed filters are shipped to Fort Pierce for crushing. Following crushing, the filters are either smelted at Magnum's Fort Pierce facility or the U.S. Foundry in Medley, Florida. At the time of the inspection, drums of used oil filters were sealed and properly labeled.

Empty 55-gallon drums are collected in a drum washing area located at the west end of the product oil tank farm. The drums are pressure washed with water. Diesel fuel or kerosene is used to "cut" the oil. The oily waste from the drum cleaning operation drains to a sump next to the wash area. The oily waste is then pumped from the sump, via aboveground piping, to T-630. If the waste generated at the wash area is water, a valve can be used to route the wastewater to tanks SKE and SKW.

Wastewater, including petroleum contact water (PCW), industrial wastewater, rainwater collected in secondary containment areas and water distilled from the re-refining of used oil is accumulated in two 47,000 gallon aboveground storage tanks SKE and SKW. The wastewater is treated in a pre-treatment system consisting of gravity separation, chemical treatment, flocculation, coagulation and dissolved air flotation. Any oil recovered from the tanks by gravity separation or dissolved air flotation is pumped to T-630 for re-refining. Following pre-treatment of the wastewater, the water is discharged to the Plant City POTW.

Used antifreeze picked-up by IOS drivers is placed in a separate compartment in the tanker trucks. When the truck arrives at IPC the used antifreeze is transferred to T-630 for processing with the used oil or it may be pumped to tank 20V (or alternate tanks) for recycling. The destination of the incoming used antifreeze is dependent on the glycol content of the antifreeze. Antifreeze containing greater then 30% glycol (high value glycol) typically goes to tank 20V. IPC stores the antifreeze in tank 20V until it has enough to fill a rail car. Rail cars of used antifreeze are shipped to the Magnum – Ft. Pierce facility for recycling. Antifreeze with low glycol value normally goes to T-630. According to Mr. Allen, IPC requires a hazardous waste determination be made prior to the acceptance of any used antifreeze that is not destined for recycling. A separate waste determination is necessary for each facility. A review of IPC's records showed that each client providing antifreeze to IPC had a TCLP analysis performed for four contaminates of concerns; benzene, lead, trichloroethene and tetrachloroethene. Any client's antifreeze that tested hazardous was not being accepted by IPC.

Solid waste managed at the facility includes oily solid waste generated by IPC and its clients. Oil contaminated solid waste is picked-up by IOS as a service to its clients. The solid waste handled by IPC includes filter basket debris, sludge absorbents, contaminated soil and rags. The waste is managed as non-hazardous waste. The solid wastes are bulked and sent to an approved thermal facility or a licensed landfill for disposal.

A large amount of the solid waste generated by IPC comes from the cleaning of lint traps and sumps. The Company has done extensive testing of these waste streams. The analyses from these tests indicate that the waste is non-hazardous. A review of the records at IPC for the previous twelve months showed that the lint trap and sump waste had been managed properly.

Before the processed oil is shipped off-site, a composite sample is collected from tank 552 using the All-levels sampling procedure or, depending on tank level, a sample may be drawn from a six-foot high sample port. The sample is taken to the IES on-site laboratory for analysis. If the analytical results indicate that the processed oil meets the on-spec criteria, the oil is released for shipment or further

blending. Re-refined oil may be blended or stored in tanks 1, 2, 3, 4, 5, 6, 7, 8, 9, 10, 11, 12, 20V or 24K with other virgin fuels to make a variety of different fuel blends to meet customer demands. An inspection of the analytical results indicated that the re-refined oil meets the specification for No. 5 Fuel Oil and the on-spec criteria listed in 40 CFR 279.11.

At various locations throughout the facility there were observed 5-gallon buckets of used oil mostly used to collect drips/leaks from piping and equipment. These buckets were not properly labeled, "Used Oil". A used oil container in the lab was also not labeled "Used Oil" in violation of **40 CFR 279.54(f)(1).** The violation was corrected immediately following the inspection.

On one trailer used for storage, the inspectors observed an open 5-gallon container of oily wastewater. Rainwater had collected in the container to the point that it was full and overflowing. There was evidence of oil stains on the ground beneath the trailer. Facility personnel transferred the oily wastewater to another container and removed the contaminated soil, as required by 40 CFR 279.54(g), prior to the end of the compliance inspection.

Incoming and outgoing manifests for used oil, used oil filters, crushed oil filters, petroleum contact water and antifreeze are kept by IPC for at least three years. Records for the previous twelve months were reviewed for completeness and accuracy. No record violations were observed.

The Company had copies of its current registrations for used oil transporter, processor and marketer, and used oil filter transporter, transfer facility and processor. IPC also submitted its annual report.

Fire extinguishers at the facility are being serviced annually. The fire and emergency equipment are inspected monthly. The facility is equipped with spill kits consisting of absorbents, blankets and booms. Inspection records were reviewed and found to be complete.

The tanks and related piping are inspected daily. The daily inspection logs were reviewed and found to be complete.

The facility had proof of insurance ($2MM) dated August 28, 2000.

IPC and IOS employees receive training as outlined in the company's "Used Oil Training and Certification Manual". The company's truck drivers are provided driver training and an orientation program. All personnel are to receive annual refresher training. The last annual refresher training was conducted on May 20, 2000, and July 29, 2000. IPC could not produce training records for seventeen (17) of the forty-three (43) employees who manage used oil or are designated as Emergency Coordinators. This is a violation of **Specific Condition V.2 in the facility's operating permit.**

10. <u>SUMMARY OF ALLEGED VIOLATIONS</u>:

40 CFR 279.54(f)(1)	Failure to properly label containers of used oil with the words "Used Oil". **(corrected)**
62-710.510(2) F.A.C.	Failure of the company to notify the Department's District Office of any refusal to pick-up used oil.
Specific Condition V.2	Failure to provide annual refresher training to facility personnel.

11. RECOMMENDED CORRECTIVE ACTIONS:

62-710.510(2) F.A.C.	Effective immediately, the company will notify the Department's District Office by letter or electronic mail of any refusal to pick-up used oil by an IOS transporter within 72 hours of the refusal.
Specific Condition V.2	Within 30 days, the facility is to provide the required annual refresher training to those company personnel for which there are no year 2000 training records available. Upon completion of the training, the facility shall submit a copy of the attendance sheets from the training session(s) to FDEP as proof that the training was completed.

Report prepared by: _____
Al Gephart
Engineer IV

Report prepared by: _____
Jim Dregne
Environmental Specialist III

Approved by: _____ Date: 2/26/01
Elizabeth Knauss
Environmental Manager

USED OIL PROCESSOR CHECKLIST

Facility Name: IPC Date: 9/25/00

Facility Representative: Allen / Mobley Facility ID : FLD 065 650 613

Inspector: TAN/EVANS/GEPHART/Dregne Registration #

40 CFR 279 Subpart F -- Processor Standards

1. Is the facility exempt under any of the following? (279.50(a)) Y____ N✓

   Transporter or burner processing incidental to normal course of operations? Y____ N✓

   Processors who also generate, transport, market, dispose or burn used oil must comply with the applicable Subparts of Part 279.

2. Does the processor have an EPA ID Number? (279.51(a)) Y✓ N____

3. Is the processor Registered? (62-710.500(1)(b)) Y✓ N____

4. Does the processor have a general permit? 62-710.800(1)) Y____ N✓ *

   * HAS A used oil OPERATING PERMIT # 93015-HO06-001

5. For new facilities, was the notification of intent to use the general permit submitted 30 days prior to beginning operation? For existing facilities, was the notification for renewal submitted 30 days prior to expiration of the general permit?(62-710.800(2)) Y____ N____ ✓N/A

Oil Filter Processing Standards-- 62-710.850 F.A.C.

1. Does the facility process used oil filters by removing oil, draining, crushing or element separation? Describe in narrative. Generators who process their own filters are not regulated provided the filters are not disposed of in a landfill but are managed by a registered processor. Y✓ N____

   Is the facility a registered used oil filter processor? (62-710.850) Y✓ N____

2. Are the filters stored in above ground containers which are: (62-710.850(6))

   In good condition? Y✓ N____

   Closed or otherwise protected from weather? Y✓ N____

   Labeled "Used Oil Filters"? Y✓ N____

   Stored on an oil impervious surface? Y✓ N____

3. Are records maintained on DEP Form 62-710.900(2) or equivalent that include: (62-710.850(5)(a))

   Destination or end use of the processed filters? Y✓ N____

   Name and street address of each destination or end user? Y✓ N____

   Are copies kept at the facility's street address for 3 years? (62-710.850(5)(b)) Y✓ N____

4. Is an Annual Report submitted by March 1 for the previous calendar year summarizing the above records? (62-710.850(5)(c)) Y✓ N____

Facility Name: IPC
Date: 9/25/00

Oil Management Standards - 279.54

1. Is used oil stored only in tanks or containers? (Circle applicable units) Y ✓ N

2. If the facility has tanks, do they comply with 62-761 and ~~62-762~~ F. A. C. rules? Y ✓ N
   (Applicable to USTs over 100 g and ASTs over 550 gallons. Describe in narrative, including number and size of tanks, noting registration numbers if applicable, and compliance status.)

   Is secondary containment consisting of a floor and dike which are impervious to oil provided for ASTs ? Applies to all ASTs regardless of size per 279.54(d & e) Y ✓ N

3. Are containers and tanks in good condition and not leaking? (279.54(b)) Y N ✓ *
   * 5 GALLON BUCKET IN TRAILER

4. Are containers provided with secondary containment consisting of walls and floor at a minimum? (279.54(c)) Y ✓ N

   Is the containment system impervious to oil so as to prevent migration? Y ✓ N

5. Are ASTs, UST tank fill lines and containers labeled "used oil? (279.54(f)) Y N ✓ *
   * 5 GALLON BUCKETS NOT LABELED ON SITE & IN LAB

6. Does the facility stop operations and clean up releases of used oil, repairing or replacing any leaking units as applicable? (279.54(g)) Y ✓ N

General Facility Standards - 279.52

1. Is the facility maintained and operated to prevent a fire, explosion or planned or unplanned release of used oil to the air, soil, or water which could threaten human health or the environment? (279.52(a)(1)) Y ✓ N

2. Does the facility have an internal communication or alarm system capable of giving immediate emergency instruction to facility personnel?(279.52(a)) Y ✓ N

3. Is there a telephone, alarm, 2-way radio or other device at the scene of operations immediately available and capable of summoning assistance from local fire departments? (279.52(a)(2)(ii)) Y ✓ N

   Is there immediate access to this equipment by all personnel who are engaged in pouring, mixing, spreading or otherwise handled, either directly or by voice or visual contact with another employee? (279.52(a)(4)) Y ✓ N

4. Describe fire control equipment. Is it adequate? (279.52(a)(2)(iii)) Y ✓ N

5. Is spill control and decontamination equipment present? (279.52(a)(2)(iii)) Y ✓ N

6. If sprinklers, water hoses or foam producing equipment is part of the facility fire control equipment, is water available at adequate volume and pressure? (279.52(a)(2)(iii)) Y ✓ N

7. Is the emergency equipment inspected and tested periodically? Y ✓ N
   Frequency? ANNUALLY

Facility Name: IPC
Date: 9/25/00

8. Is there adequate aisle space to allow unobstructed movement of facility personnel and emergency equipment to any area of the facility where needed? (279.52(a)(5i)) Y ✓ N

9. Has the facility made emergency response arrangements with the following: (279.52(a)(6))
   - Fire Department: Y ✓ N
   - Police: Y ✓ N
   - Hospital: Y ✓ N
   - Emergency Response Contractor: Y ✓ N

10. If not, has the facility attempted to do so and is the refusal documented? Y N

Contingency Plans and Emergency Response -- 279.52(b)

1. Does the facility have a contingency plan? Y ✓ N
2. Is it at the facility and easily available? Y ✓ N
3. Does the plan include:
   - Fire Response Procedure: (compare to 279.52(b)(6)) N/A Y ✓ N
   - Spill Response Procedures: " N/A Y ✓ N
   - Explosion Response Procedures: " N/A Y ✓ N
   - Instructions for handling contaminated materials & residues Y ✓ N
   - A description of arrangements with local authorities: N/A Y ✓ N
   - Emergency Coordinators: (Name) GARY ALLEN Y ✓ N
   - Addresses and telephone numbers of Emergency Coordinators: Y ✓ N
   - Emergency equipment list: Y ✓ N
   - Specifications and capabilities of emergency equipment: Y ✓ N
   - Locations of emergency equipment: Y ✓ N
   - An evacuation plan and routes: Y ✓ N
   - Evacuation/alarm signals: Y ✓ N
   - External reporting procedures: Y ✓ N
   - Internal recordkeeping requirements: Y ✓ N
4. Is the plan up to date, with no changes to the list of emergency equipment, list of emergency coordinators, applicable regulations or contingency plan failures since the last revision? (279.52(b)(4)) Y ✓ N
5. Has the plan been distributed to the local police, fire department, ERT and hospital? Circle omitted authorities. (279.52(b)(3)) Y ✓ N
6. Is the emergency coordinator authorized to commit funds for incident response? Y ✓ N
7. Has the processor noted in the operating record any incidents requiring implementation of the contingency plan? (279.52(b)(6)(ix)) Y ✓ N
9. Were written reports made within 15 days to the DEP? (279.52(b)(6)(ix)) Y N ✓ N/A

Facility Name: PC
Date: 9/25/00

Rebuttable Presumption and Analysis Plan -- 279.53, 279.55

1. Does the processor have a written analysis plan to determine whether used oil stored at the facility has a total halogen content above or below 1,000 ppm and whether the facility's used oil fuel meets the used oil specification? (279.55)(a)) Y ✓ N

2. Is the 1,000 ppm halogen determination made by testing? Y ✓ N

   If so, does the analysis plan cover: (279.55(a)(2))

   Sampling methods? Y ✓ N

   Frequency of sampling? Y ✓ N

   Analytical Methods? Y ✓ N

   Is the 1,000 ppm halogen determination made by process knowledge? Y N ✓

   If so, is the type of information that will be used to determine the halogen content stated in the analysis plan? (279.55(a)(3)) Y N

3. Have any analyses showed exceedances of the 1,000 ppm level? Y ✓ N

   If so, was the oil managed as hazardous waste? Y N ✓

   If not, was the oil exempt? Describe basis for presumption rebuttal in narrative. (ex. analysis, refrigerant oil, etc.) N/A Y ✓ N

4. Is the used oil fuel specification determination made by testing?

   If so, does the analysis plan cover: (279.55(b)(2))

   Sampling methods? Y ✓ N

   Whether the oil will be tested before or after processing? Y ✓ N

   Frequency of sampling? Y ✓ N

   Analytical Methods? Y ✓ N

   Is the used oil fuel specification determination made by process knowledge? Y N ✓

   If so, is the type of information that will be used to determine the halogen content stated in the analysis plan? (279.55(b)(3)) Y N

5. Are all oil processing residues managed as used oil, reclaimed, or used as asphalt manufacture feedstock? (279.59) N/A Y N ✓

   If not, has the processor conducted a hazardous waste determination? (279.10(e)) N/A Y ✓ N

6. Are test records or copies of records providing basis for determinations kept for 3 years? Y ✓ N

Facility Name: EPC
Date: 9/25/00

Recordkeeping and Reporting – 279.57, 62-710.510-520 F.A.C.

1. Do used oil acceptance records include: (279.56(a))

Name & address of the generator or off site source of the used oil?	Y ✓	N
EPA ID # of oil provider (if applicable)?	Y ✓	N
Name & Address of the transporter delivering the oil to the facility?	Y ✓	N
EPA ID # of the transporter delivering the oil	Y ✓	N
Quantity of oil shipped?	Y ✓	N
Type of oil received (62-710.510(1)(c))	Y	N
Date of shipment?	Y ✓	N

2. Do used oil delivery records include: (279.56(b), also check marketer requirements)

Name & Address of receiving facility? (burner, processor or disposal site)	Y ✓	N
EPA ID # of receiving facility?	Y ✓	N
Name & Address of transporter delivering the oil?	Y ✓	N
EPA ID # of transporter?	Y ✓	N
Quantity of oil delivered?	Y ✓	N
End Use of the oil? (62-710.510(1)(e))	Y ✓	N
Date of delivery?	Y ✓	N

3. Does the facility keep records on DEP Form 62-710.900(2) or equivalent? (62-710.501(1)) Y ✓ N

4. Does the facility submit an annual report by March 1 summarizing the on site records for the previous calendar year? (62-710.520) Y ✓ N

   If not, is the facility an electric utility processing only self generated used oil for recycling, which is exempt from state registration and reporting requirements? (62-710.530)? Y N

5. Does the transporter keep copies of the record and reports for three years at the street address of the facility? (62-710.510(2)) Y ✓ N

Closure – 62-710.800(3) F.A.C. and 279.54(h)

1. Has the facility submitted a written closure plan? (62-710.800(3)(a)) Y ✓ N

2. Does the plan include procedures for removing containers of oil and residues? Y ✓ N

   Cleaning and decontaminating tanks and ancillary equipment? Y ✓ N

   Removing contaminated soils? Y ✓ N

   Eliminating the need for further maintenance? Y ✓ N

If the facility operated tank systems, and not all contaminated soils can be practicably removed, the owner or operator must close the facility as a hazardous waste landfill.

USED OIL TRANSPORTER CHECKLIST

Facility Name: IPC - IOS Date: 9/25/00

Facility Representative: ALLEN Facility ID # FLD 065 650 643

Inspector: TAM / EVANS / GEPHART / DREEHP

40 CFR 279 Subpart E -- Transporter Standards

1. Is the facility exempt under any of the following? [279.40(a)] Y____ N✓

   On site transport?

   Generator transporting < 55 g /time to a collection center?

   Transporter of < 55 g /time from generator to aggregation point owned by same generator?

2. If the transporter also transports hazardous waste in the same trucks as are used to transport used oil, are the vehicles emptied per 261.7 after HW shipments? (If not, the used oil must be managed as hazardous) Y____ N____ NA ✓

3. Does the transporter process used oil incidental to transport? [279.41] Y____ N✓

   Are any residues managed as used oil, reclaimed, or used as asphalt manufacture feedstock? N/A✓ Y____ N____

   If not, has the transporter conducted a hazardous waste determination? [279.10(e)] N/A✓ Y____ N____

4. Has the facility notified of used oil activities? Check EPA form 8700-12. Y✓ N____

5. Does the transporter only deliver used oil to other transporters, oil processors, off specification used oil burners with EPA ID Numbers, or to on-specification oil burners? [279.43(a)] Y✓ N____

6. Does the transporter comply with DOT requirements? [279.43(b)] Y✓ N____

7. If any oil is discharged during transport, does the transporter: [279.43(c)]

   Notify National Response Center and State Warning Point and Coast Guard per 33 CFR 153.203, as applicable? Y✓ N____

   Report to DOT in writing per 49 CFR 171.16? Y✓ N____

   Clean up any discharges until the discharge poses no threat? Y✓ N____

8. Does the facility also transport used oil filters? Y✓ N____

   If so, are the filters stored in above ground containers which are: [62-710.850(6)]

   In good condition? Y✓ N____

   Closed or otherwise protected from weather? Y✓ N____

   Labeled "Used Oil Filters"? Y✓ N____

   Stored on an oil impervious surface? Y✓ N____

Facility: IPC / I
Date: 9/25/00

Transporter Recordkeeping -- 279.46

1. Do used oil acceptance records include: [279.46(a)]

Name & Address of facility providing the oil for transport?	Y ✓	N
EPA ID # of oil provider (if applicable)?	Y ✓	N
Quantity of oil shipped?	Y ✓	N
Date of shipment?	Y ✓	N
Signature of oil provider, dated upon receipt?	Y ✓	N

2. Do used oil delivery records include: [279.46(b)]

Name & Address of receiving facility or transporter?	Y ✓	N
EPA ID # of receiving facility or transporter?	Y ✓	N
Quantity of oil delivered?	Y ✓	N
Date of delivery?	Y ✓	N
Signature of oil receiver, dated upon receipt?	Y ✓	N

3. Do the above records also include state required information on the type of oil and destination or end use? [62-710.510(1)(c & e)] Y ✓ N

4. Does the facility keep records on DEP Form 62-701.900(13) or equivalent? [62-710.510(1)] Y ✓ N

5. Does the facility submit an annual report on DEP Form 62-701.900(14) by March 1 summarizing the on site records for the previous calendar year? [62-710.510(5)] Y ✓ N

If not, is the facility a generator who transport only their own used oil generated at their own non-contiguouos operations to their own central collection facility for storage prior to having their used oil picked up by a certified used oil transporter.? [62-710.510(3)] Y N

7. Does the transporter keep copies of the record and reports for three years at the street address of the facility? [62-710.510(4)] Y ✓ N

8. Does the transporter sell to burners or claim that any oil meets the specification? If so, complete the USED OIL MARKETER checklist. Y ✓ N

Transporter Certification -- 62-710 F.A.C.

1. Is the transporter certified? (local governments, and < 55g/time transporters are exempt) [62-710.600] Y ✓ N

2. Does the facility maintain training records? [62-710.600(2)(c)] Y ✓ N

3. Does the facility maintain insurance or financial assurance of $100,000 combined single limit? [62-710.600(2)(d)] Y ✓ N

4. Is the facility registration form and ID number displayed at the facility? [62-710.500(4)] Y ✓ N

Facility: IPC(S
Date: 9/25/00

Rebuttable Presumption -- 279.44

1. Does the transporter determine whether used oil stored being transported or stored at a transfer facility has a total halogen content above or below 1,000 ppm? Y✓ N____

   Is this done by testing? Y✓ N____ "sniffer"

   Is this done by process knowledge? Describe basis in narrative. Y____ N____

   Are test records or copies of records providing basis for determination kept for 3 years? [279.44(d)] Y✓ N____

2. Have any analyses showed exceedances of the 1,000 ppm level? Y✓ N____

   If so, was the oil managed as hazardous waste? Y____ N✓

   If not, was the oil exempt? Describe in narrative. N/A____ Y✓ N____

Transfer Facility Standards -- 279.45

1 Does the transporter store used oil at any transportation related facility (including parking lots) for more than 24 hours and not longer than 35 days during the normal course of transport? Transfer facilities storing used oil more than 35 days must comply with 279 Subpart F N/A✓ Y____ N____

   Is the transfer facility registered per 62-710.500(1)(a) F. A. C.? Y____ N____

2. Is used oil stored only in tanks or containers? (Circle applicable units) Y____ N____

3. If the facility has tanks, do they comply with 62-761 F. A. C. rules? (Describe in narrative, including number and size of tanks, noting registration numbers if applicable, and compliance status.) Y____ N____

   Is secondary containment provided and adequate? Y____ N____

4. Are containers, and tank trailers in good condition and not leaking? Y____ N____

5. Are containers provided with secondary containment consisting of walls and floor at a minimum? Y____ N____

   Is the containment system impervious to oil so as to prevent migration? Y____ N____

6. Are ASTs, UST tank fill lines and containers labeled "used oil? Y____ N____

7. Are used oil filters stored more than 10 days? Y____ N____

   If so, is the facility a registered used oil filter transfer facility? [62-710.850] N/A____ Y____ N____

8. Does the facility stop operations and clean up releases of used oil, repairing or replacing any leaking units as applicable? Y____ N____

Florida Department of

Memorandum **Environmental Protection**

ENFORCEMENT/COMPLIANCE COVER MEMO

TO: 3/28
☒ Deborah A. Getzoff, Director of District Management
☐ William Kutash, Environmental Administrator
☐ Office of General Counsel, ATTN:_____

FROM 3/28/01
William Kutash, Environmental Administrator
SCT Stanley Tam, Professional Engineer II
Elizabeth Knauss, Environmental Manager
Al Gephart, Engineer IV
Jim Dregne, Environmental Specialist III

DATE: ~~February 20, 2001~~ March 14, 2001

FILE NAME: **International Petroleum Corporation (IPC)** PROJECT #: 242089

PROGRAM: Hazardous Waste COUNTY: Hillsborough

TYPE OF DOCUMENT:

☐ draft or ☐ final	☐ NOV	☐ Consent Order
☐ Final Order	☐ Case Report	☐ Penalty Authorization
☒ Warning Letter	☐ Other	

DESCRIPTION OF VIOLATIONS: IPC generates, transports, markets and processes used oil and generates and transports used oil filters. IPC also handles used antifreeze. During this routine annual inspection, inspectors found three violations. Documentation of annual training could not be located for every employee. Several 5-gallon buckets were not labeled "Used Oil". Company drivers were not notifying the Department of the refusal to pick-up used oil from generators.

SUMMARY OF CORRECTIVE ACTIONS: The facility must return to compliance. The labeling violation has been corrected. No penalty is contemplated.

PENALTY SUMMARY:

Potential for Harm: N/A Extent of Deviation: N/A

Penalty Amount: 0.00 Expenses: 0.00

TOTAL PENALTY AMOUNT: 0.00 ☐ TO SECRETARY

Anti freeze

EarthLiquids

Bob Dance Jeep Eagle —
Bob Dance Chrysler —
Chapman Contracting NPU
Heintzelman Truck Ctr NPU
Loomis Fargo - Tampa NPU
Mobicare NPU
SWWMD - Brooksville NPU
Speedway Dodge NPU
Stone Buick NPU Safety Kleen
Laidlaw
Volvo Store NPU Chemcon

Copy of Analysis for J. Dagrie
Dlegre

PHOSLAB

Phone 941-682-5897 806 West Beacon Road • Lakeland, Florida 33803-2847 Fax 941-683-3279

Client: Speedway Dodge
2280 W. International Speedway Blvd.
Daytona Beach, FL 32114

Attention: David Maxwell
P. O. #:
Project Name: Speedway Dodge
Reference: Antifreeze Analysis

Sampled By: Client
Sample Date: 08-25-99
Date Received: 08-31-99
Analysis Date: 08-31/09-02-99
Analyzed By: GJF/JMC

CERTIFICATE OF ANALYSIS

TOXICITY CHARACTERISTIC LEACHING PROCEDURE
EPA METHOD 1311

Sample ID: Antifreeze

	Conc., mg/L	Regulatory Limit
Tetrachloroethene	<0.10	0.70
Trichloroethene	<0.10	0.50
Benzene	0.612	0.50
Lead	0.08	5.00

Over

QA DATA:

8260 SURROGATE	% RECOVERY	QA LIMITS
1,4-Dichlorobutane	97	100 ± 15
4-Bromochlorobenzene	98	100 ± 15

LEAD	% RECOVERY	QA LIMITS
Matrix Spike	100	100 ± 15

QA OFFICER

CHEMIST

FDER QA/QC #870308G

INTERNATIONAL PETROLEUM CORPORATION
GENERATOR'S WASTE MATERIAL
PROFILE SHEET

No

A. GENERAL INFORMATION

GENERATOR NAME: SPEEDWAY DODGE
FACILITY ADDRESS: 2280 W. INTERNATIONAL SPEEDWAY BLVD. DAYTONA BEACH, FL 32114
TECHNICAL CONTACT: DAVID MAXWELL TITLE: SERVICE MGR. PHONE: 904-255-0571 FAX: 255-0575
NAME OF WASTE: USED ANTIFREEZE
PROCESS GENERATING WASTE: AUTO REPAIR
TRANSPORTER: IOS
TRANSPORTER PHONE: 800-282-9585
GENERATOR US EPA ID#:
GENERATOR STATUS:
QUANTITY:

B. PHYSICAL CHARACTERISTICS OF WASTE

Color: GREEN
ODOR: ☐ NONE ☑ MILD ☐ STRONG
DESCRIBE: RUBBERISH
PHYSICAL STATE @ 70°F: ☐ SOLID ☐ SEMI-SOLID ☑ LIQUID ☐ POWDER
LAYERS: ☐ MULTILAYERED ☐ BI-LAYERED ☐ SINGLE PHASED
FREE LIQUIDS: ☑ YES ☐ NO VOLUME 95%

pH: ☐ < 2 ☐ 2-4 ☐ 4.1-6.9 ☐ 7 ☐ EXACT ☐ 7.1-10 ☐ 10.1-12.5 ☐ > 12.5 ☐ N/A
SPECIFIC GRAVITY: ☐ < .8 ☐ .8-1.0 ☐ 1.1-1.2 ☐ 1.3-1.4 ☐ 1.6-1.7 ☐ > 1.7 ☐ EXACT
FLASH POINT: ☐ < 70°F ☐ 70°F-100°F ☐ 101°F-139°F ☐ 140°F-200°F ☐ > 200°F ☑ NO FLASH ☐ EXACT
☐ CLOSED CUP ☐ OPEN CUP

C. CHEMICAL COMPOSITION (TOTALS MUST ADD TO 100%) (mg/L)

WASTE WATER	79 %
GLYCOL	20 %
OIL	1 %
	%
	%
	%

D. METALS ☐ TOTAL (ppm) ☐ EPA EXTRACTION PROCEDURE

ARSENIC (as) ____ SELENIUM (se) ____
BARIUM (ba) ____ SILVER (ag) ____
CADMIUM(cd) ____ COPPER(cu) ____
CHROMIUM(cr) ____ NICKEL(ni) ____
MERCURY(hg) ____ ZINC(zn) ____
LEAD(pb) ____ HALLIUM(li) ____
CHROMIUM-HEX (cr + 6): ____

CHECK ONE BOX ☐ ANALYTICAL FURNISHED ___YES ___NO

- ☐ SOLIDS OR SLUDGES THAT ARE NOT PETROLEUM RELATED: EXPLAIN:
- ☐ SOLIDS OR SLUDGES CONTAMINATED WITH USED OIL
- ☐ SOLIDS OR SLUDGES CONTAMINATED WITH VIRGIN PETROLEUM OIL
- ☐ WASTE WATER THAT IS NOT PETROLEUM RELATED : EXPLAIN:
- ☐ WASTE WATER CONTAMINATED WITH USED OIL
- ☐ WASTE WATER CONTAMINATED WITH VIRGIN OIL
- ☐ WASTE WATER CONTAMINATED WITH FUEL
- ☐ USED OIL
- ☐ VIRGIN FUEL
- ☑ OTHER: WASTE WATER / ANTIFREEZE
- ☐ 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, the recyclable material submitted for acceptance to International Petroleum Corporation is not a listed hazardous waste and does not exhibit any of the characteristics of a hazardous waste as defined in 40 CFR, 261 of the toxicity characteristic revision rules as specified in the March 29,1990 Federal register. I further certify that the recyclable material submitted for acceptance to International Petroleum Corporation is classified as non hazardous in its state of generation, and that I am authorized to execute this document.

X DM INITIAL

TOXIC SUBSTANCE CONTROL ACT

I, the undersigned, under penalty of law do hereby certify that the materials submitted for acceptance to International Petroleum Corporation does not contain any detectable concentrations of PCB's as defined in Section 6 (E) of TSCA (ISUSC2605) and (40 CFR Part 761).

X BR INITIAL

CERTIFICATION

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

SPEEDWAY DODGE Brandt Frenchman SERV. MAN 8-25-99

PHOSLAB

Phone 941-682-5897 806 W. Beacon Road • Lakeland, Florida 33803 Fax 941-683-3279

Client: Loomis Fargo Co.
802 B North 12th St.
Tampa, FL 33602

Attention: Robert Eddings
P. O. #:
Project Name: Antifreeze Analysis
Reference:

Sampled By: Client
Sample Date: 11-24-98
Date Received: 11-25-98
Analysis Date: 11-27/30-98
Analyzed By: GJF/JMC

CERTIFICATE OF ANALYSIS

TOXICITY CHARACTERISTIC LEACHING PROCEDURE
EPA METHOD 1311

Sample ID: Antifreeze

	Conc., mg/L	Regulatory Limit
Tetrachloroethene	0.78	0.70
Trichloroethene	<0.02	0.50
Benzene	<0.02	0.50
Lead	<0.01	5.00

QA DATA:

8240 SURROGATE	% RECOVERY	QA LIMITS
1,4-Dichlorobutane	105	100 ± 15
4-Bromochlorobenzene	92	100 ± 15

LEAD	% RECOVERY	QA LIMITS
Matrix Spike	98	100 ± 15

Faxed

Post-it™ brand fax transmittal memo 7671 | # of pages ▸ 1
To Mike Anderson | From Phoslab
Co. | Co.
Dept. | Phone #
Fax # | Fax #

QA OFFICER

CHEMIST

FDER QA/QC #870308G

INTERNATIONAL PETROLEUM CORPORATION
GENERATOR'S WASTE MATERIAL
PROFILE SHEET

№ 1215

A. GENERAL INFORMATION

GENERATOR NAME: Loomis' Fargo & Co
FACILITY ADDRESS: 802 B N 12th ST
Tampa FL 33602
TECHNICAL CONTACT: Robert Eddings TITLE: Shop Foreman PHONE: 813 223-6822 FAX 273-0546
NAME OF WASTE: Used Antifreeze
PROCESS GENERATING WASTE: Truck Repair / Servicing QUANTITY: 55 gallons

TRANSPORTER: T.O.S
TRANSPORTER PHONE:
GENERATOR US EPA ID#:
GENERATOR STATUS: CESQG

B. PHYSICAL CHARACTERISTICS OF WASTE

Color: Green

ODOR: ☑ NONE ☐ MILD ☐ STRONG
DESCRIBE

PHYSICAL STATE @ 70°F: ☐ SOLID ☐ SEMI-SOLID ☑ LIQUID ☐ POWDER

LAYERS: ☐ MULTILAYERED ☑ BI-LAYERED ☐ SINGLE PHASED

FREE LIQUIDS: ☐ YES ☐ NO VOLUME 99.1 %

pH: ☐ < 2 ☐ 2-4 ☐ 4.1-6.9 ☐ 7 ☐ EXACT ☑ 7.1-10 ☐ 10.1-12.5 ☐ > 12.5 ☐ N/A

SPECIFIC GRAVITY: ☐ < .8 ☐ .8-1.0 ☐ 1.1-1.2 ☐ EXACT ☐ 1.3-1.4 ☐ 1.6-1.7 ☐ > 1.7

FLASH POINT: ☐ < 70°F ☐ 70°F -100°F ☐ 101°F-139°F ☐ 140°F- 200°F ☐ > 200°F ☑ NO FLASH ☐ EXACT

☐ CLOSED CUP ☐ OPEN CUP

C. CHEMICAL COMPOSITION (TOTALS MUST ADD TO 100%) (mg/L)

waste water	70 %
glycols	30 %
	%
	%
	%
	%
	%

D. METALS ☐ TOTAL (ppm) ☐ EPA EXTRACTION PROCEDURE

ARSENIC (as) SELENIUM (se)
BARIUM (ba) SILVER (ag)
CADMIUM(cd) COPPER(cu)
CHROMIUM(cr) NICKEL(ni)
MERCURY(hg) ZINC(zn)
LEAD(pb) HALLIUM(ti)
CHROMIUM-HEX (cr + 6):

CHECK ONE BOX ☑ ANALYTICAL FURNISHED ✓ YES ___ NO

☐ SOLIDS OR SLUDGES THAT ARE NOT PETROLEUM RELATED: EXPLAIN:
☐ SOLIDS OR SLUDGES CONTAMINATED WITH USED OIL:
☐ SOLIDS OR SLUDGES CONTAMINATED WITH VIRGIN PETROLEUM OIL
☐ WASTE WATER THAT IS NOT PETROLEUM RELATED : EXPLAIN:
☐ WASTE WATER CONTAMINATED WITH USED OIL
☐ WASTE WATER CONTAMINATED WITH VIRGIN OIL
☐ WASTE WATER CONTAMINATED WITH FUEL
☐ USED OIL
☐ VIRGIN FUEL
☑ OTHER: wastewater / Anti
☐ 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, the recyclable material submitted for acceptance to International Petroleum Corporation is not a listed hazardous waste and does not exhibit any of the characteristics of a hazardous waste as defined in 40 CFR 261 of the toxicity characteristic revision rules as specified in the March 28,1990 Federal register. I further certify that the recyclable material submitted for acceptance to International Petroleum Corporation is classified as non hazardous in its state of generation, and that I am authorized to execute this document.

RLC INITIAL

TOXIC SUBSTANCE CONTROL ACT

I, the undersigned, under penalty of law do hereby certify that the materials submitted for acceptance to International Petroleum Corporation does not contain any detectable concentrations of PCB's as defined in Section 6 (E) of TSCA (ISUSC2605) and (40 CFR Part 761).

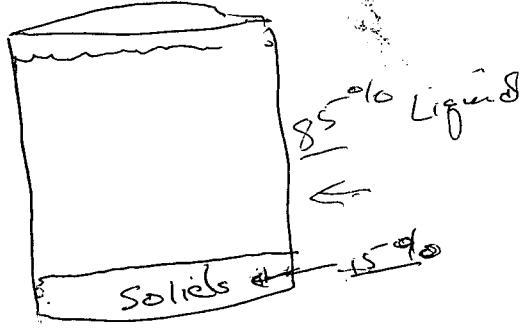
INITIAL

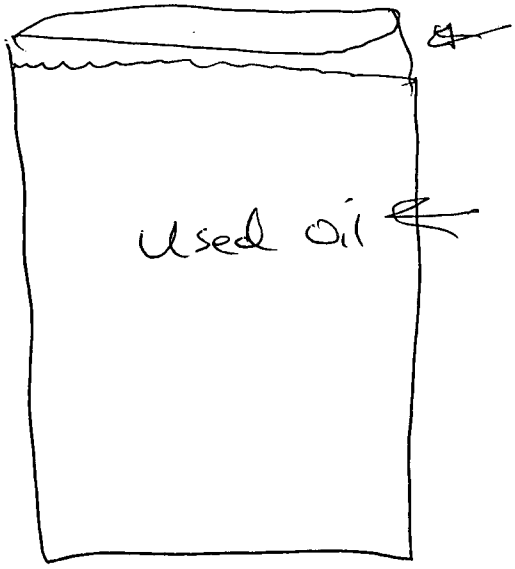
CERTIFICATION

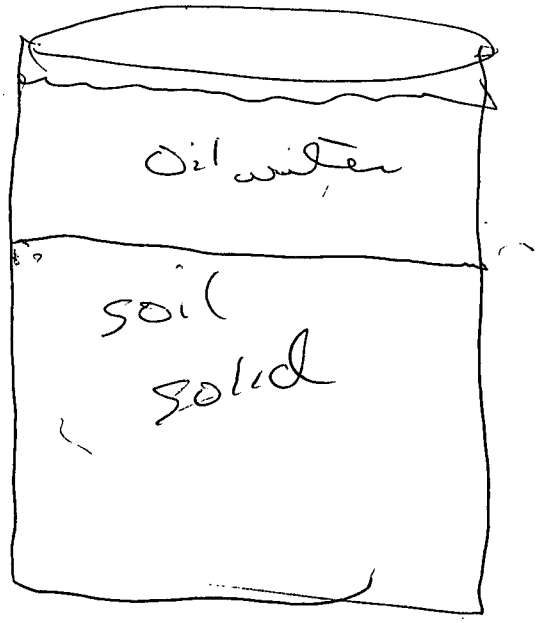
I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage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

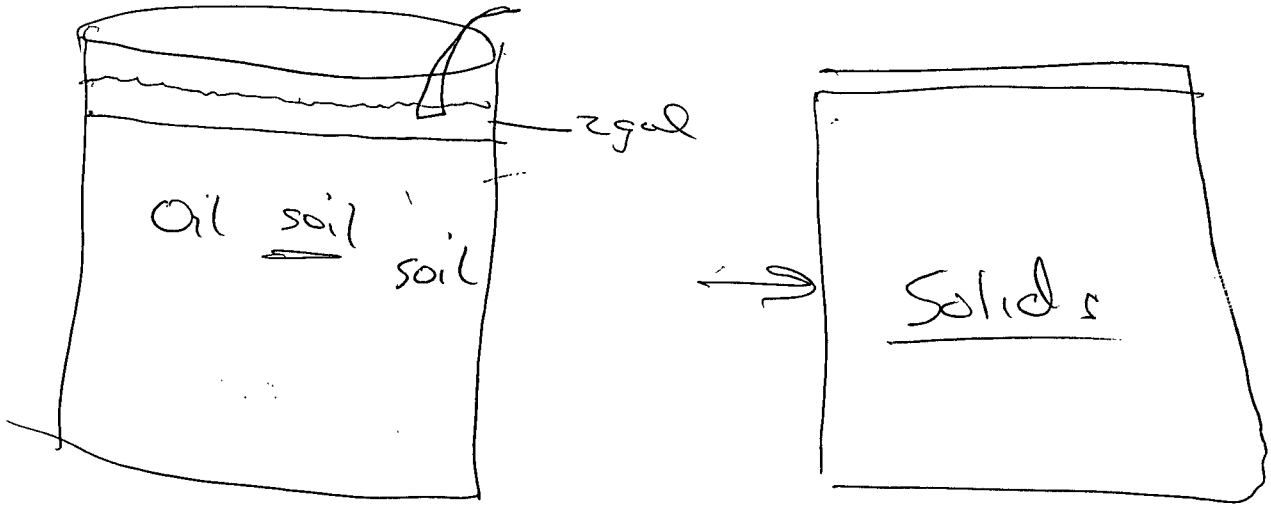
Loomis Fargo	Robert Eddings	Shop Foreman	11/24/98
COMPANY	AUTHORIZED SIGNATURE	TITLE	DATE

GENWASTE.DOC 8-21-96









absorbant — 2gal

rags 1gal

soil 20gal

Progress Environmental Laboratories

4420 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

Report Date: 3/27/97
Page: 1 of 2

Attn: Michael S. Anderson

PEL Lab # : 9703-00179-1
Client ID : Used Antifreeze
Project ID :
Location : Bob Dance Chrysler
Matrix : Liquid

Collection Information:
Sample Date: 3/18/97
Sample Time: 0:00
Sampled By : Client
Sample Quality:

ND = Less than MDL

Parameter	Method	Results	Units	MDL
Volatiles	EPA 8010			
Dichlorodifluoromethane	EPA 8010	ND	ug/l	4.8
cis-1,2-Dichloroethene	EPA 8010	ND	ug/l	2.0
Chloromethane	EPA 8010	ND	ug/l	7.4
Vinyl Chloride	EPA 8010	ND	ug/l	2.5
Bromomethane	EPA 8010	ND	ug/l	5.1
Chloroethane	EPA 8010	ND	ug/l	2.9
Trichlorofluoromethane	EPA 8010	ND	ug/l	3.6
1,1-Dichloroethene	EPA 8010	ND	ug/l	3.5
Methylene Chloride	EPA 8010	1900	ug/l	100
Trans-1,2-dichloroethene	EPA 8010	ND	ug/l	4.2
1,1-Dichloroethane	EPA 8010	ND	ug/l	2.8
Chloroform	EPA 8010	ND	ug/l	10.0
1,1,1-Trichloroethane	EPA 8010	ND	ug/l	3.0
Carbontetrachloride	EPA 8010	ND	ug/l	3.4
1,2-Dichloroethane	EPA 8010	ND	ug/l	4.2
Trichloroethene	EPA 8010	ND	ug/l	3.6
1,2-Dichloropropane	EPA 8010	ND	ug/l	3.8
Bromodichloromethane	EPA 8010	ND	ug/l	4.1
2-Chloroethylvinyl ether	EPA 8010	ND	ug/l	13.0
Cis-1,3-Dichloropropene	EPA 8010	ND	ug/l	3.8
Trans-1,3-Dichloropropene	EPA 8010	ND	ug/l	4.2
1,1,2-Trichloroethane	EPA 8010	ND	ug/l	5.1
Tetrachloroethene	EPA 8010	2510	ug/l	36
Dibromochloromethane	EPA 8010	ND	ug/l	4.8
Bromoform	EPA 8010	ND	ug/l	8.0
1,1,2,2-Tetrachloroethane	EPA 8010	ND	ug/l	8.2
Analysis date	EPA 8010	3-26-97		

- CONTINUED ON NEXT PAGE -

Progress Environmental Laboratories

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

To: International Oil Service
105 South Alexander Street
Plant City, FL 33566

Report Date: 3/27/97
Page: 2 of 2

Attn: Michael S. Anderson

PEL Lab # : 9703-00179-1 (Continued ...)
Client ID : Used Antifreeze

ND = Less than MDL

Parameter	Method	Results	Units	MDL
*1,4Dichlorobutane(10-150%)	EPA 8010	93	%R	
*4-BFB (10-150%)	EPA 8010	85	%R	
GC Volatiles	EPA 8020			
MTBE	EPA 8020	ND	ug/l	6.3
Benzene	EPA 8020	5.2	ug/l	2.5
Toluene	EPA 8020	73	ug/l	3.1
Chlorobenzene	EPA 8020	ND	ug/l	4.3
Ethylbenzene	EPA 8020	41	ug/l	4.3
m,p-Xylene	EPA 8020	157	ug/l	4.7
o-Xylene	EPA 8020	60	ug/l	5.3
1,3-Dichlorobenzene	EPA 8020	ND	ug/l	5.7
1,4-Dichlorobenzene	EPA 8020	ND	ug/l	4.1
1,2-Dichlorobenzene	EPA 8020	ND	ug/l	4.7
Analysis date	EPA 8020	3-26-97		
*Fluorobenzene (81-124%)	EPA 8020	99	%R	
Lead	EPA 6010	8740	ug/l	292

Respectfully submitted,
Charles R. Ingram, Quality Assurance Officer.

Progress Environmental Laboratories   № 15006

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

PM Mike Anderson

(52)

Client: Bob Dance Chrysler	Due Date(TAT): Standard	601 / 602 / 6010 Lead
Project Mgr:	Fax Reports to: 813) 791-3789	
Project :	Bill to: International oil	
Project #: Bob Dance Chrysler		
PO #:	Sampler's Initials:	9703-179

Station ID	Date	Time	PEL Lab #	# of Bttls	Pres	601	602	6010 Lead						Remarks
Used Antifreeze	3-18		1	4		✓	✓	✓						
														No Trip blank

Relinquished By:	Received By:	Date	Time	Project Notes
[signature]	[signature]	3/19/97	827	
Relinquished By:	Received By:	Date	Time	3-26
Relinquished By:	Received By:	Date	Time	
Relinquished By:	Received By:	Date	Time	

PHOSLAB

Phone 941-682-5897 806 W. Beacon Road • Lakeland, Florida 33803 Fax 941-683-3279

Client: International Oil Service
105 South Alexander Street
Plant City, Florida 33566

Attn: Mr. Joe McCray
P. O. #:
Project: Bob Dance Jeep Eagle
Reference: Orlando

Sampled By: Mike Anderson
Sample Date: 10-30-97
Date Received: 10-30-97
Analysis Date: 10-30/31-97
Analyzed By: GJF/JMC

CERTIFICATE OF ANALYSIS

TOXICITY CHARACTERISTIC LEACHING PROCEDURE
EPA METHOD 1311

Sample ID: Bob Dance Antifreeze

	Conc., mg/L	Regulatory Limit
Tetrachloroethene	0 922	0.70
Trichloroethene	<0.020	0.50
Benzene	<0 02	0.50
Lead	0.08	5.00

NO Good
Switch To onsite Recycling

QA OFFICER

CHEMIST

Post-it™ brand fax transmittal memo 7671 | # of pages ▸ 1
To Mike Anderson | From Judy

PHOSLAB

Phone 941-682-5897 806 W. Beacon Road • Lakeland, Florida 33803 Fax 941-683-3279

Client: Stone Buick GMC
30777 US 19 North
Palm Harbor, Florida 34684

Attention: Denny Chamberlain
P. O. #:
Project Name: Anifreeze Analysis
Reference:

Sampled By: Client
Sample Date: 03-10-99
Date Received 03-12-99
Analysis Date: 03-15/19/25-99
Analyzed By: GJF/JMC

CERTIFICATE OF ANALYSIS

TOXICITY CHARACTERISTIC LEACHING PROCEDURE
EPA METHOD 1311

Sample ID: Antifreeze

	Conc., mg/L	Regulatory Limit
Tetrachloroethene	222.00 ✓	0.70
Trichloroethene	<2.00	0.50
Benzene	<2.00	0.50
Lead	<0.01	5.00

QA DATA:

8240 SURROGATE	% RECOVERY	QA LIMITS
1,4-Dichlorobutane	93	100 ± 15
4-Bromochlorobenzene	96	100 ± 15

LEAD	% RECOVERY	QA LIMITS
Matrix Spike	92	100 ± 15

QA OFFICER

CHEMIST

FDER QA/QC #870308G

IN RNATIONAL PETROLEUM CORPORA J

GENERATOR'S WASTE MATERIAL PROFILE SHEET

Nº 1254

A. GENERAL INFORMATION

GENERATOR NAME: Stone Buick GMC
TRANSPORTER: T.O.S
FACILITY ADDRESS: 30777 US 19 N
TRANSPORTER PHONE:
GENERATOR US EPA ID#:
Palm harbor FL 34684
GENERATOR STATUS:
TECHNICAL CONTACT: Donny Chamberlain TITLE: Svc mgr PHONE: 727-787-8663 FAX 727 787 9388
NAME OF WASTE: waste water / Antifreeze
PROCESS GENERATING WASTE: Auto Repair Servicing QUANTITY: 150 gallon

B. PHYSICAL CHARACTERISTICS OF WASTE

Color: Green
ODOR ☐ NONE ☑ MILD ☐ STRONG
DESCRIBE: Rubberly

PHYSICAL STATE @ 70°F: ☐ SOLID ☐ SEMI-SOLID ☑ LIQUID ☐ POWDER
LAYERS: ☑ MULTILAYERED ☐ BI-LAYERED ☐ SINGLE PHASED
FREE LIQUIDS: ☑ YES ☐ NO VOLUME 99.9 %

pH: ☐ < 2 ☑ 7.1-10 ☐ 2-4 ☐ 10.1-12.5 ☐ 4.1-6.9 ☐ > 12.5 ☐ 7 ☐ N/A ☐ EXACT
SPECIFIC GRAVITY: ☐ < .8 ☐ 1.3-1.4 ☐ .8-1.0 ☐ 1.6-1.7 ☑ 1.1-1.2 ☐ > 1.7 ☐ EXACT
FLASH POINT: ☐ < 70°F ☐ 70°F -100°F ☐ 101°F-139°F ☐ 140°F- 200°F ☐ > 200°F ☑ NO FLASH ☐ EXACT
☐ CLOSED CUP ☐ OPEN CUP

C. CHEMICAL COMPOSITION (TOTALS MUST ADD TO 100%)

(mg/L)	
water	70 %
glycol	30 %
	%
	%
	%
	%
	%
	%

D. METALS ☐ TOTAL (ppm) ☐ EPA EXTRACTION PROCEDURE

ARSENIC (as) SELENIUM (se)
BARIUM (ba) SILVER (ag)
CADMIUM(cd) COPPER(cu)
CHROMIUM(cr) NICKEL(ni)
MERCURY(hg) ZINC(zn)
LEAD(pb) HALLIUM(li)
CHROMIUM-HEX (cr + 6):

CHECK ONE BOX ☑ ANALYTICAL FURNISHED ☑ YES ☐ NO

- ☐ SOLIDS OR SLUDGES THAT ARE NOT PETROLEUM RELATED: EXPLAIN:
- ☐ SOLIDS OR SLUDGES CONTAMINATED WITH USED OIL:
- ☐ SOLIDS OR SLUDGES CONTAMINATED WITH VIRGIN PETROLEUM OIL
- ☐ WASTE WATER THAT IS NOT PETROLEUM RELATED : EXPLAIN:
- ☐ WASTE WATER CONTAMINATED WITH USED OIL
- ☐ WASTE WATER CONTAMINATED WITH VIRGIN OIL
- ☐ WASTE WATER CONTAMINATED WITH FUEL
- ☐ USED OIL
- ☐ VIRGIN FUEL
- ☑ OTHER: water / glycol
- ☐ 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, the recyclable material submitted for acceptance to International Petroleum Corporation is not a listed hazardous waste and does not exhibit any of the characteristics of a hazardous waste as defined in 40 CFR 261 of the toxicity characteristic revision rules as specified in the March 28,1900 Federal register. I further certify that the recyclable material submitted for acceptance to International Petroleum Corporation is classified as non hazardous in its state of generation, and that I am authorized to execute this document.

INITIAL

TOXIC SUBSTANCE CONTROL ACT

I, the undersigned, under penalty of law do hereby certify that the materials submitted for acceptance to International Petroleum Corporation does not contain any detectable concentrations of PCB's as defined in Section 6 (E) of TSCA (ISUSC2605) and (40 CFR Part 761).

INITIAL

CERTIFICATION

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

STONE BUICK GMC		SERVICE MANAGER	3-10-99
COMPANY	AUTHORIZED SIGNATURE	TITLE	DATE

PHOSLAB

Phone 863-682-5897 806 West Beacon Road • Lakeland, Florida 33803-2847 Fax 863-683-3279

Client: The Volvo Store
1051 W. Webster Ave.
Winter Park, FL 32790

Attention: Mr. Nick Baker
P. O. #:
Project Name: Antifreeze
Project Location:

Sampled By: Nick
Sample Date: 04-21-00
Date Received: 04-27-00
Analysis Date: 04-28/29-00
Analyzed By: GJF/JMC

CERTIFICATE OF ANALYSIS

TOXICITY CHARACTERISTIC LEACHING PROCEDURE
EPA METHOD 1311

Sample ID: Antifreeze

	Conc., mg/L	Regulatory Limit
Tetrachloroethene	6.55	0.70
Trichloroethene	≤1.00	0.50
Benzene	88.20	0.50
Lead	0.38	5.00

Reject D.P. Hz 5-4-00

QA DATA:

8260 SURROGATE	% RECOVERY	QA LIMITS
1,4-Dichlorobutane	95	100 ± 15
4-Bromochlorobenzene	110	100 ± 15

LEAD	% RECOVERY	QA LIMITS
Matrix Spike	92	100 ± 15

QA OFFICER

CHEMIST

PHOSLAB

Phone 863-682-5897 806 West Beacon Road • Lakeland, Florida 33803-2847 Fax 863-683-3279

Client: Mobicare
16747 Rocket Blvd.
Orlando, FL 32824

Attention: Mr. Mike O'Neal
P. O. #:
Project Name: Used Coolant
Project Location: Orlando, FL

Sampled By: Michael
Sample Date: 04-28-00
Date Received: 05-01-00
Analysis Date: 04/28-05-02-00
Analyzed By: 05-01/02-00

CERTIFICATE OF ANALYSIS

TOXICITY CHARACTERISTIC LEACHING PROCEDURE
EPA METHOD 1311

Sample ID: Used Coolant

	Conc., mg/L	Regulatory Limit
Tetrachloroethene	6.51	0.70
Trichloroethene	<1.00	0.50
Benzene	<1.00	0.50
Lead	2.94	5.00

Retest D.P. 5-4-00 Hx2 - off Nick

QA DATA:

8260 SURROGATE	% RECOVERY	QA LIMITS
1,4-Dichlorobutane	107	100 ± 15
4-Bromochlorobenzene	100	100 ± 15

LEAD	% RECOVERY	QA LIMITS
Matrix Spike	92	100 ± 15

no pick up

QA OFFICER

CHEMIST

Advanced
Environmental Laboratories, Inc.

8936 Western Way • Suite 7
Jacksonville, Florida 32256
(904) 363-9350
FAX (904) 363-9354

Client: International Petroleum Corp.
Project Name: Heintzelman Truck Center
Project No.:

Address: 105 S. Alexander St
Plant City, Fl 33566

Attention: Nick Baker

Report No.: J001850
Date Sampled: 7/11/00
Date Submitted: 7/14/00
Date Reported 7/21/00

Project Chemist: KB

Sample Description

The following aqueous sample was submitted by International Petroleum Corp. on 7/14/00 for analysis outlined on the attached Chain of Custody:

Project No.: Heintzelman Truck Center

1. Antifreeze @ 11:00

on site

Approved by: _____
Jolene C. Warnke-Roszel Project Manager

HRS# 82533,E82574
DEP# 940242

Analytical Report

Client: International Petroleum Corp.
Project No.: Heintzelman Truck Center
Matrix: Aqueous

Report No.: J001850
Date Sampled: 7/11/00
Date Submitted: 7/14/00
Date Reported: 7/21/00

TCLP Volatiles
EPA Method 5030/8260
Units: mg/L

			Lab Code:	J001850-1	J001829-mb
			Dilution Factor:	50	1
			Date Analyzed:	7/19/00	7/1900
Analytes	MRL	TCLP Limits	Sample Name:	Anti-freeze	Method Blank
Benzene	0.10	0.5		~~U~~	U
Tetrachloroethene	0.10	0.7		1.08	U
Trichloroethene	0.10	0.5		~~U~~	U

Surrogate	Acceptance Limits	Percent Recovery	Percent Recovery
1,2-Dichloroethane	80-120	85	117
Toluene-d8	88-110	107	105
4-Bromofluorobenzene	86-115	108	103

Haz. to Fisher
D.P. 7-24-00

U Not detected above the MRL
MRL Method Reporting Limit

Analytical Report

Client:	International Petroleum Corp.	**Report No.:**	J001850
Project No.:	Heintzelman Truck Center	**Date Sampled:**	7/11/00
Matrix:	Aqueous	**Date Submitted:**	7/14/00
		Date Reported:	7/21/00
		Page No.:	3 of 3

TCLP Metals
Units: mg/L

				Lab Code:	J001850-1	J001865-1mb
Analyte	**Method**	**MRL**	**TCLP Limits**	**Date Analyzed**	**Antifreeze**	**Method Blank**
Lead	6010B	0.25	5.0	7/17/00	0.683	U

U Not detected above the MRL
MRL Method Reporting Limit

Advanced
Environmental Laboratories, Inc.

8936 Western Way • Suite 7
Jacksonville, Florida 32256
(904) 363-9350
FAX (904) 363-9354

Client: International Petroleum Corporation
Project Name: Chapman Contracting-C2620
Project No.:

Address: 105 S. Alexander
Plant City, FL 33066

Attention: Gene Sciulli

Report No.: J001556
Date Sampled: 6/15/00
Date Submitted: 6/19/00
Date Reported: 6/26/00

Project Chemist:

Sample Description

The following aqueous sample was submitted by International Petroleum Corporation on 6/19/00 for analysis outlined on the attached Chain of Custody:

Project Name: Chapman Contracting-C2620

1. Waste Antifreeze @ 11:00

Rejected
D.P.
6-26-00

no pickups

Approved by: Jolene Roszel-Warnke, Project Manager

HRS# 82533,E82574
DEP# 940242

Analytical Report

Client:	International Petroleum Corporation	**Report No.:**	J001556
Project No.:	Chapman Contracting-C2620	**Date Sampled:**	6/15/00
Matrix:	Aqueous	**Date Submitted:**	6/19/00
		Date Reported:	6/26/00
		Page No.:	2 of 3

TCLP Volatiles
EPA Method 5030/8260
Units: mg/L

Analytes	MRL	TCLP Limits	Lab Code:	J001556-1	J001591-mb
			Dilution Factor:	50	1
			Date Analyzed:	6/24/00	6/24/00
			Sample Name:	Waste Antifreeze	Method Blank
Benzene	0.10	0.5		U	U
Carbon Tetrachloride	0.10	0.5		U	U
Chlorobenzene	0.10	100.0		U	U
Chloroform	0.10	6.0		U	U
1,2-Dichloroethane	0.10	0.5		U	U
1,1-Dichloroethene	0.10	0.7		U	U
Methyl ethyl ketone	0.10	200.0		**0.298**	U
Tetrachloroethene	0.10	0.7		U	U
Trichloroethene	0.10	0.5		U	U
Vinyl Chloride	0.10	0.2		U	U

Surrogate	Acceptance Limits	Percent Recovery	Percent Recovery
1,2-Dichloroethane-d4	80-120	85	108
Toluene-d8	88-110	94	95
4-Bromofluorobenzene	86-115	90	110

U Not detected above the MRL
MRL Method Reporting Limit

Analytical Report

Client:	International Petroleum Corporation	**Report No.:**	J001556
Project No.:	Chapman Contracting-C2620	**Date Sampled:**	6/15/00
Matrix:	Aqueous	**Date Submitted:**	6/19/00
		Date Reported:	6/26/00
		Page No.:	3 of 3

Miscellaneous Metals
Units: mg/L

			Lab Code: J001556-1		J001564-mb
Analyte	**Method**	**MRL**	**Date Analyzed**	**Waste Antifreeze**	**Method Blank**
Lead	6010B	0.25	6/20/00	**12.8**	U

U Not detected above the MRL
MRL Method Reporting Limit

C2620 –

INTERNATIONAL PETROLEUM CORPORATION
GENERATOR'S WASTE MATERIAL PROFILE SHEET

№ 2502

A. GENERAL INFORMATION

GENERATOR NAME: Chapman Contracting
TRANSPORTER: IPC
FACILITY ADDRESS: 9550 Columbus Dr.
TRANSPORTER PHONE: 754-1504
Tampa, FL
GENERATOR US EPA ID#:
GENERATOR STATUS:
TECHNICAL CONTACT: Walden Fletcher TITLE: Svc Mgr PHONE: 621-2467 FAX:
NAME OF WASTE: Waste Antifreeze
PROCESS GENERATING WASTE: Veh Maint.
QUANTITY: 200-300 gal

B. PHYSICAL CHARACTERISTICS OF WASTE

Color: Brown

ODOR ☐ NONE ☒ MILD ☐ STRONG
DESCRIBE: Petro

PHYSICAL STATE @ 70°F: ☐ SOLID ☐ SEMI-SOLID ☒ LIQUID ☐ POWDER

LAYERS: ☐ MULTILAYERED ☒ BI-LAYERED ☐ SINGLE PHASED

FREE LIQUIDS: ☒ YES ☐ NO VOLUME 100%

pH: ☐ < 2 ☐ 2-4 ☐ 4.1-6.9 ☐ 7 ☐ EXACT ____ ☐ 7.1-10 ☐ 10.1-12.5 ☐ > 12.5 ☒ N/A

SPECIFIC GRAVITY: ☐ < .8 ☒ .8-1.0 ☐ 1.1-1.2 ☐ EXACT ____ ☐ 1.3-1.4 ☐ 1.6-1.7 ☐ > 1.7

FLASH POINT: ☐ < 70°F ☐ 70°F -100°F ☐ 101°F-139°F ☐ 140°F- 200°F ☐ > 200°F ☒ NO FLASH ☐ EXACT ____

☐ CLOSED CUP ☒ OPEN CUP

C. CHEMICAL COMPOSITION (TOTALS MUST ADD TO 100%) (mg/L)

Waste Antifreeze	50 %
Waste oil	10 %
Waste H_2O	40 %
	%

D. METALS ☐ TOTAL (ppm) ☐ EPA EXTRACTION PROCEDURE

ARSENIC (as) ____ SELENIUM (se) ____
BARIUM (ba) ____ SILVER (ag) ____
CADMIUM(cd) ____ COPPER(cu) ____
CHROMIUM(cr) ____ NICKEL(ni) ____
MERCURY(hg) ____ ZINC(zn) ____
LEAD(pb) ____ HALLIUM(ti) ____
CHROMIUM-HEX (cr + 6): ____

CHECK ONE BOX ☐ ANALYTICAL FURNISHED X YES ___ NO

- ☐ SOLIDS OR SLUDGES THAT ARE NOT PETROLEUM RELATED: EXPLAIN:
- ☐ SOLIDS OR SLUDGES CONTAMINATED WITH USED OIL:
- ☐ SOLIDS OR SLUDGES CONTAMINATED WITH VIRGIN PETROLEUM OIL
- ☐ WASTE WATER THAT IS NOT PETROLEUM RELATED : EXPLAIN:
- ☐ WASTE WATER CONTAMINATED WITH USED OIL
- ☐ WASTE WATER CONTAMINATED WITH VIRGIN OIL
- ☐ WASTE WATER CONTAMINATED WITH FUEL
- ☐ USED OIL
- ☐ VIRGIN FUEL
- ☒ OTHER: Waste Antifreeze
- ☐ 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, the recyclable material submitted for acceptance to International Petroleum Corporation is not a listed hazardous waste and does not exhibit any of the characteristics of a hazardous waste as defined in 40 CFR 261 of the toxicity characteristic revision rules as specified in the March 28,1990 Federal register. I further certify that the recyclable material submitted for acceptance to International Petroleum Corporation is classified as non hazardous in its state of generation, and that I am authorized to execute this document.

INITIAL ✓

TOXIC SUBSTANCE CONTROL ACT

I, the undersigned, under penalty of law do hereby certify that the materials submitted for acceptance to International Petroleum Corporation does not contain any detectable concentrations of PCB's as defined in Section 6 (E) of TSCA (ISUSC2605) and (40 CFR Part 761).

INITIAL ✓

CERTIFICATION

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

Chapman Contracting / Walden Fletcher / Shop Foreman / 6-15-00

COMPANY AUTHORIZED SIGNATURE TITLE DATE

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

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

To: Southwest FL Water Dist.
2379 Broad St.
Brooksville, FL 34609

Report Date: 8/07/98
Page: 1 of 1

Attn: Anna Jacques

PEL Lab # : 9807-00392-1
Client ID : Antifreeze
Project ID :
Location : Antifreeze
Matrix : Liquid

Collection Information:
Sample Date: 7/29/98
Sample Time: 15:00
Sampled By : Client
Sample Quality:

ND = Less than RL

Parameter	Method	Results	Units	RL
Lead	EPA 6010	1350	ug/l	1.8
TCLP Lead	1311/6010	0.10	mg/l	0.03
Aromatic Volatiles by GC	EPA 8021			
Benzene	EPA 8021	111	ug/l	1.7
Analysis date	EPA 8021	08-05-98		
*4-BFB (10-150%)	EPA 8021	84.7	%R	
TCLP Volatiles	1311/8260			
TCLP Tetrachloroethene	1311/8260	0.51	mg/l	0.0036
TCLP Trichloroethene	1311/8260	ND	mg/l	0.0083
TCLP Benzene	1311/8260	ND	mg/l	0.0036
Analysis Date	EPA 8260	08-05-98		
Halogenated Volatiles by GC	EPA 8021			
Trichloroethene	EPA 8021	ND	ug/l	2.5
Tetrachloroethene	EPA 8021	1440	ug/l	16
Analysis date	EPA 8021	08-05-98		
*1,4Dichlorobutane(10-150%)	EPA 8021	87.0	%R	
*4-BFB (10-150%)	EPA 8021	78.7	%R	

Respectfully submitted,
Vincent M. Giampa, Laboratory Manager.

no pick-ups

TOTAL P.03

98PD2048 - 250

[ERNATIONAL PETROLEUM CORPORA N
GENERATOR'S WASTE MATERIAL
PROFILE SHEET

№ 1170

A. GENERAL INFORMATION

GENERATOR NAME: Southwest Florida Water Mgmt Dist
FACILITY ADDRESS: 2379 Broad ST
Brooksville FL 34609
TECHNICAL CONTACT: Ange Jacques TITLE: Secretary PHONE 352-423-1476 FAX 352-754-6884
NAME OF WASTE: Antifreeze/water
PROCESS GENERATING WASTE: Vehicle Repair/Services QUANTITY: 55 gallon
TRANSPORTER:
TRANSPORTER PHONE:
GENERATOR US EPA ID#:
GENERATOR STATUS: CESQG

B. PHYSICAL CHARACTERISTICS OF WASTE

Color: Green

ODOR: ☑ NONE ☐ MILD ☐ STRONG
DESCRIBE

PHYSICAL STATE @ 70°F: ☐ SOLID ☐ SEMI-SOLID ☑ LIQUID ☐ POWDER

LAYERS: ☐ MULTILAYERED ☑ BI-LAYERED ☐ SINGLE PHASED

FREE LIQUIDS: ☑ YES ☐ NO VOLUME 99 %

pH: ☐ < 2 ☐ 2-4 ☐ 4.1-6.9 ☐ 7 ☐ EXACT ☑ 7.1-10 ☐ 10.1-12.5 ☐ > 12.5 ☐ N/A

SPECIFIC GRAVITY: ☐ < .8 ☐ .8-1.0 ☑ 1.1-1.2 ☐ 1.3-1.4 ☐ 1.6-1.7 ☐ > 1.7 ☐ EXACT

FLASH POINT: ☐ < 70°F ☐ 70°F -100°F ☐ 101°F-139°F ☐ 140°F- 200°F ☐ > 200°F ☑ NO FLASH ☐ EXACT

☐ CLOSED CUP ☐ OPEN CUP

C. CHEMICAL COMPOSITION (TOTALS MUST ADD TO 100%)

(mg/L)

water	70 %
glycol	30 %
	%
	%
	%
	%
	%

D. METALS ☐ TOTAL (ppm) ☐ EPA EXTRACTION PROCEDURE

ARSENIC (as) _____ SELENIUM (se) _____
BARIUM (ba) _____ SILVER (ag) _____
CADMIUM(cd) _____ COPPER(cu) _____
CHROMIUM(cr) _____ NICKEL(ni) _____
MERCURY(hg) _____ ZINC(zn) _____
LEAD(pb) _____ HALLIUM(ti) _____
CHROMIUM-HEX (cr + 6): _____

CHECK ONE BOX ☑ ANALYTICAL FURNISHED ☑ YES ☐ NO

- ☐ SOLIDS OR SLUDGES THAT ARE NOT PETROLEUM RELATED: EXPLAIN:
- ☐ SOLIDS OR SLUDGES CONTAMINATED WITH USED OIL:
- ☐ SOLIDS OR SLUDGES CONTAMINATED WITH VIRGIN PETROLEUM OIL
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- ☐ WASTE WATER CONTAMINATED WITH VIRGIN OIL
- ☐ WASTE WATER CONTAMINATED WITH FUEL
- ☐ USED OIL
- ☐ VIRGIN FUEL
- ☑ OTHER: Antifreeze/water
- ☐ SOIL THAT IS NOT PETROLEUM RELATED : EXPLAIN:
- ☐ SOIL CONTAMINATED WITH USED OIL
- ☐ SOIL CONTAMINATED WITH VIRGIN OIL
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Southwest Florida Water Mgmt. District	Ange Jacques	Secretary	7-29-98
COMPANY	AUTHORIZED SIGNATURE	TITLE	DATE