ECT
Environmental Consulting & Technology, Inc.

1408 NORTH WESTSHORE BOULEVARD
SUITE 115
TAMPA, FLORIDA 33607
(813) 289-9338

LETTER OF TRANSMITTAL

Via FedEx – NEXT MORNING DELIVERY REQUESTED

Project No. 110341-0400

TO:

DATE: February 21, 2012

Mr. Bheem Kothur, P.E., DEE
Senior Project Engineer and Manager
Florida Department of Environmental Protection
2600 Blair Stone Road
Tallahassee, Florida 32399-2400

Phone No. 850- 245-8781

PROJECT NO. **Safety-Kleen Systems (SK) Ocala Permit Renewal Application (Proj. No. 110341-0400)**

✓ **We are sending you** ☐ Attached ☐ Under Separate Cover via _____

Copies	Description
1	**Permit Renewal Application Electronic Version (PDF)**

These are transmitted as checked below:

☐ For Approval
☐ For your information
☐ For review and comment
☐ Review and Correct
☐ Returned for Corrections
☐ Prints Returned after Loan to us
☐ Review and File
X Record and Process / File

Mr. Kothur:

On behalf of our client, Safety-Kleen Systems, enclosed please find one CD containing the PDF copy of the Used Oil Processing Facility Permit Application for the S-K Ocala, Florida facility. Thank you for your attention to this matter. Please acknowledge the Department's timely receipt and recording of this application.

Sincerely,

Dean Barcenas, ECT-Tampa, Project Manager

dbarcenas@ectinc.com

USED OIL PROCESSING OPERATING PERMIT RENEWAL APPLICATION

Prepared for:

SAFETY-KLEEN SYSTEMS, INC
359 Cypress Road
Ocala, Florida 34472

Facility EPA ID # FLR 000 060 301

Prepared by:

1408 North Westshore Boulevard
Suite 115
Tampa, Florida 33607
Telephone: (813) 289-9338
Fax: (813) 289-9388
www.ectinc.com

110341-0400
FEBRUARY 2012

TABLE OF CONTENTS

APPLICATION FORM FOR A USED OIL PROCESSING FACILITY PERMIT

Part I

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

A. General Information

1. New_____ Renewal __X__ Modification _____ **Date old permit expires** 04/22/12

2. Revision number _____

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

_____ generators (Subpart C)
_____ transporters (Subpart E)
_____ burners of off-spec used oil (Subpart G)
_____ marketers (Subpart H)
or
__X__ are disposing of used oil (Subpart I)

4. Date current operation began: January 1, 2000

5. Facility name: Safety-Kleen Systems, Inc.

6. EPA identification number: FLR 000 060 301

7. Facility location or street address: 359 Cypress Road

8. Facility mailing address:

359 Cypress Road	Ocala	FL	34472
Street or P.O. Box	City	State	Zip Code

9. Contact person: Jeff Curtis Telephone: (352) 266-0320
Title: EHS Manager
Mailing Address:

359 Cypress Road	Ocala	FL	34472
Street or P.O. Box	City	State	Zip Code

10. Operator's name: Safety-Kleen, Inc. Telephone: (972) 265-2000
Mailing Address:

5360 Legacy Drive, Building 2, Suite 100	Plano	TX	75024
Street or P.O. Box	City	State	Zip Code

11 Facility owner's name: Safety-Kleen, Inc. Telephone: (___)_____
Mailing Address:

Street or P.O. Box	City	State	Zip Code

12 Legal structure:

__X__ corporation (indicate state of incorporation) Wisconsin
_____ individual (list name and address of each owner in spaces provided below)
_____ partnership (list name and address of each owner in spaces provided below)
_____ other, e.g. government (please specify) _____

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

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

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

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

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

13 Site ownership status: ☒ owned ☐ to be purchased ☐ to be leased ____ years
☐ presently leased; the expiration date of the lease is:

If leased, indicate:
Land owner's name: Not applicable
Mailing Address:
Street or P.O. Box City State Zip Code

14 Name of professional engineer Mr. Stan Stokes Registration No. 33251
Mailing Address:
6510 Southpoint Parkway, Suite 120 Jacksonville FL 32216-8022
Street or P.O. Box City State Zip Code
Associated with: Environmental Consulting & Technology, Inc.

B. SITE INFORMATION

1. Facility location:
County: Marion
Nearest community: Ocala
Latitude: 29o04'54"N Longitude: 81o59"2"W
Section: 22 Township: 16 Range: 23
UTM # 17 /403566 /3217439 /

2. Facility size (area in acres): ~ 12.3 acres

3. Attach a topographic map of the facility area and a scale drawing and photographs of the facility showing the location of all past, present and future material and waste receiving, storage and processing areas, including size and location of tanks, containers, pipelines and equipment. Also show incoming and outgoing material and waste traffic pattern including estimated volume and controls.

C. OPERATING INFORMATION

1. Hazardous waste generator status (SQG, LQG) CESQG

2. List applicable EPA hazardous waste codes:
   D039

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

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

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

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

5. The following parts of the facility's operating plan should be included as attachments to the permit application. (See item 5 on pages 4 and 5):
   a. An analysis plan which must include:
      (i) a sampling plan, including methods and frequency of sampling and analyses;
      (ii) a description of the fingerprint analysis on incoming shipments, as appropriate; and
      (iii) an analysis plan for each outgoing shipment (one batch/lot can equal a shipment, provided the lots are discreet units) to include: metals and halogen content.

   The analysis plan is labeled as Attachment C

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

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

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

   The tracking plan is included as Attachment E

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

   The preparedness and prevention plan is labeled as Attachment F

7. Attach a copy of the facility's Contingency Plan. This requirement should describe emergency management personnel and procedures and may be met using a modifiying or expounding on an existing SPCC plan or should contain the items listed in the Specific Instructions. (see item 7 on pages 5 and 6).

The contingency plan is labeled as Attachment G

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

The unit management description is labeled as Attachment H

9. Attach a copy of the facility's Closure plan and schedule. This plan may be generic in nature and will be modified to address site specific closure standards at the time of closure. (See item 9, pages 6 and 7).

The closure plan is labeled as Attachment I

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

A description of employee training is labeled as Attachment J

DEP Form#	62-710.901(6)(a)
Form Title	Used Oil Processing Facility Permit Application
Effective Date	June 9, 2005

APPLICATION FORM FOR A USED OIL PROCESSING PERMIT

PART II - CERTIFICATION

TO BE COMPLETED BY ALL APPLICANTS

Form 62-710.901(a). Operator Certification

Facility Name: Safety-Kleen Systems, Inc. EPA ID# FLR000060301

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gathered and evaluated the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment or knowing violations. Further, I agree to comply with the provisions of Chapter 403, Florida Statutes, Chapters 62-701 and 62-710, F.A.C., and all rules and regulations of the Department of Environmental Protection

Signature of the Operator or Authorized Representative*

Lin Longshore

Lin Longshore Vice President EHS

Name and Title (Please type or print)

Date: 2/3/2012 Telephone: (803) 359-2061

* If authorized representative, attach letter of authorization.

DEP Form#	62-710.901(6)(b)
Form Title	Used Oil Processing Facility Permit Application
Effective Date	June 9, 2005

APPLICATION FROM FOR A USED OIL PROCESSING PERMIT

PART II - CERTIFICATION

Form 62-710.901(b). Facility Owner Certification

Facility Name: Safety-Kleen Systems, Inc. EPA ID# FLR000060301

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

Signature of the Facility Owner or Authorized Representative*

Lin Longshore Vice President EHS

Name and Title (Please type or print)

Date: 2/3/2012 Telephone: (803) 359-2061

* If authorized representative, attach letter of authorization.

DEP Form#	62-710.901(6)(c)
Form Title	Used Oil Processing Facility Permit Application
Effective Date	June 9, 2005

APPLICATION FROM FOR A USED OIL PROCESSING PERMIT

PART II - CERTIFICATION

Form 62-710.901(c) Land Owner Certification

Facility Name: Safety-Kleen Systems, Inc. EPA ID# FLR000060301

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

Signature of the Land Owner or Authorized Representative*

Lin Longshore Vice President EHS

Name and Title (Please type or print)

Date: 2/3/2012 Telephone: (803) 359-2061

* If authorized representative, attach letter of authorization.

DEP Form#	62-710.901(6)(d)
Form Title	Used Oil Processing Facility Permit Application
Effective Date	June 9, 2005

APPLICATION FORM FOR A USED OIL PROCESSING PERMIT

PART II - CERTIFICATION

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

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

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

Please Print or Type

_____ Initial Certification X Recertification

1. DEP Facility ID Number: FLR 000 060 301 2. Tank Numbers: _____

3. Facility Name: Safety-Kleen Systems, Inc.

4. Facility Address: 359 Cypress Road, Ocala, FL 34472

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

Signature

Stan Stokes

Name (please type)

Florida Registration Number: 33251

Mailing Address: 6440 Southpoint Pkwy, Ste 130
Street or P. O. Box

Jacksonville FL 32216
City State Zip

Date: 2/16/2012 Telephone (904) 296-0544

[PLEASE AFFIX SEAL]

ATTACHMENT A

DESCRIPTION OF FACILITY OPERATIONS

DESCRIPTION OF FACILITY OPERATIONS

This is an existing facility that is engaged in the processing of used oil, non-hazardous used antifreeze contaminated with used oil, and used oil filters. The facility consists of 59 above ground storage tanks ranging from 200 gallons to 159,000 gallons in secondary containment units. Forty-four (44) of these tanks with a total capacity of 931,582 gallons are used oil tanks. All tanks are listed in Attachment B. The re-refining, processing and wastewater treatment system is situated within an enclosed building that is constructed on a 6-inch reinforced, sealed concrete slab. The area of the processing facility is approximately 13,000 square feet (ft^2). The warehouse/drum storage, and filter processing area is situated within an enclosed building, constructed on an 8-inch reinforced, sealed concrete slab that occupies approximately 13,000 ft^2. Approximately 15 employees work at the site.

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

ATTACHMENT B

FACILITY DETAIL PROCESS DESCRIPTION

FACILITY DETAIL PROCESS DESCRIPTION

The Safety-Kleen Systems, Inc. (S-K) facility is a used oil and used oil products transfer facility that includes: a solid waste processing operation; used oil re-refinery, and industrial wastewater transfer facility. The facility is located in Ocala, Florida. The facility conducts the storage of non-hazardous industrial wastewater and the recovery/recycling of petroleum products and/or reusable materials from a variety of regional commercial and industrial sources. Used oil and related used oil products (filters, etc.) come from a variety of sources including, but not limited to:

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

S-K is dedicated to the transfer operations of industrial wastewater, petroleum contact water (PCW) and contaminated petroleum products through a relatively simple process which recovers petroleum product and then stores the industrial wastewater prior to shipment to a permitted pre-treatment facility. The offsite permitted pretreatment facility pretreats the industrial waste and discharges it to a permitted publicly owned treatment works (POTW). S-K markets "used oil" for resale as industrial burner fuel and re-refines used oil for re-marketing. The processed "used oil" is called "recycled fuel oil" (RFO). S-K also processes solid waste in at the Solid Waste Management Area (SWMA) at the facility.

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

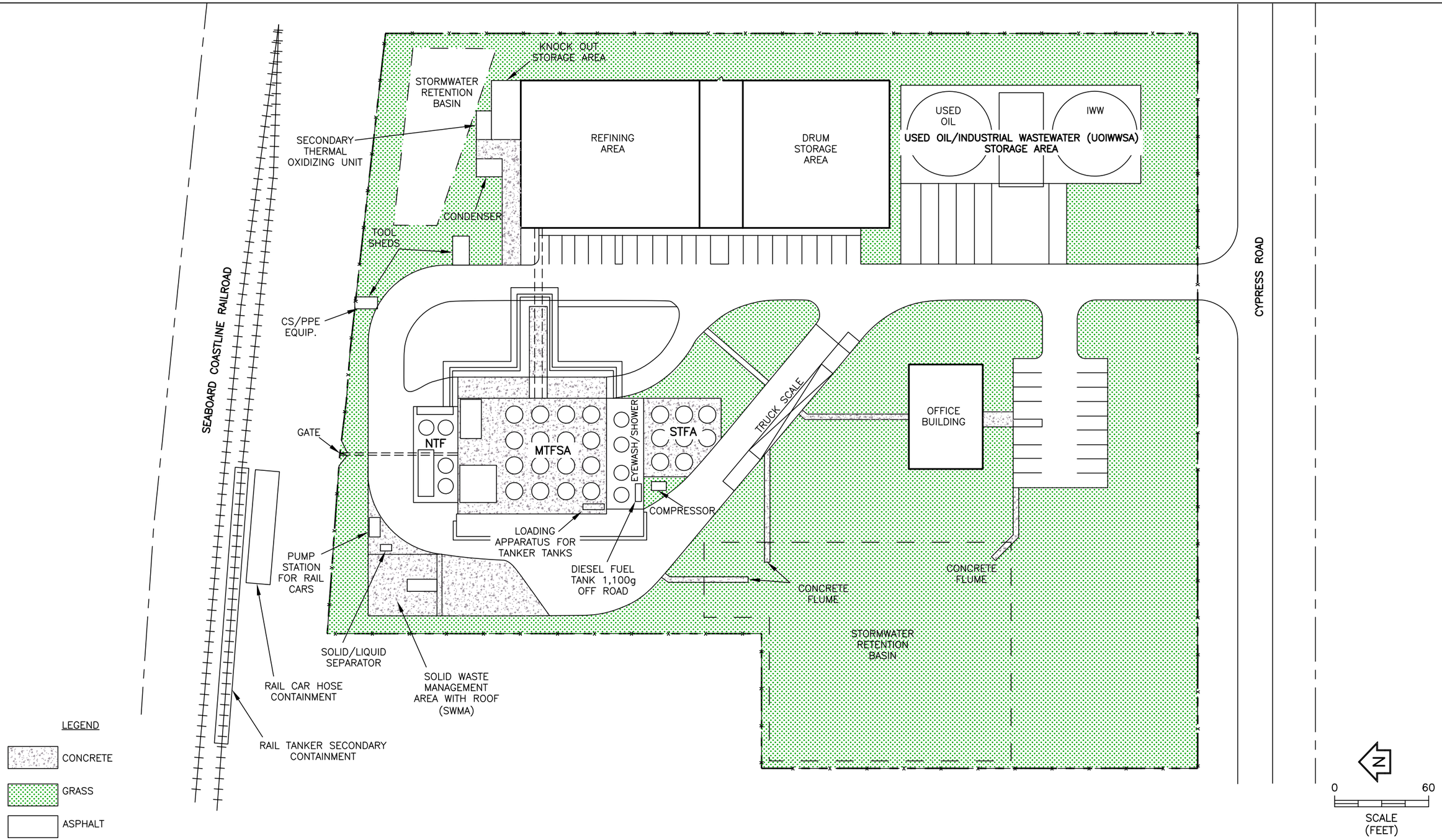

FIGURE 1.
SITE PLOT PLAN
SAFETY–KLEEN SYSTEMS, INC.
OCALA, FLORIDA

Sources: Engineering, Inc., 2007; ECT, 2012.

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

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

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

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

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

FACILITY OPERATIONS

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

- Wastewater: 1 million gallons per year (GPY);

- Used Oil: 12 million GPY;
- Used oil filter drums: 3,000 GPY;
- Nonhazardous sludges: 500,000 GPY; and
- Petroleum contaminated materials, (i.e., absorbents, soils, sludges): 300 drums per year.

Oil and wastewaters are transferred from the tank farm area to the processing area via an overhead, double-walled piping system. All drum and sludge materials are handled within the 10,000 square feet (ft^2) warehouse area or the SWMA. Absorbents and soils are consolidated from drums and placed into roll-off boxes for transportation to a permitted treatment or disposal facility. Solid waste is stored in the designated area of the warehouse. Solid waste is processed in the SWMA at the northwest comer of the facility. The facility has a fence surrounding the property to discourage unauthorized entry.

PROCESSING UNIT

Situated near the northeast corner of the site are a sophisticated re-refinery, processing, and oil dehydration system. The entire system area is indoors with walls on all sides and a roof. The floor is constructed of 6-inch thick reinforced concrete. Concrete berms and sumps exist below the surface level of the foundation. All concrete is sealed. The composition or type of sealer is of epoxy construction. The containment berms are constructed of solid concrete and are sealed to a height of 4 inches above floor level with the same type of sealer mentioned above. The roof cover is metal in this area. The area of the processing units is approximately 12,000 ft^2.

TANK FARM STORAGE AREA

Situated near the northwest comer of the subject site is the Main Tank Farm Storage Area (MTFSA). The storage area is out-of-doors and is walled on all sides. The floor is constructed of 8-inch thick, reinforced concrete. Concrete berms and sumps exist below the surface level of the foundation. All concrete is sealed. The composition or type of sealer is of epoxy construction. The containment walls are constructed of concrete masonry units with concrete filled cells. The containment walls are sealed to a height of

4-ft above floor level with the same type of sealer mentioned above. There is no roof cover. The area of the MTFSA is 7,500 (ft^2).

Two additional tank-receiving areas were constructed during 2001-2002 on the north and south sections of the existing MTFSA. The construction was similar to the existing MTFSA. The area of the North Tank Farm is approximately 1,890 ft^2. The area of the South Tank Farm is approximately 1,800 ft^2. The North and South Tank Farm secondary containment areas are connected to the MTFSA. A second area south of the Tank Farm (TM) was constructed in 2004. The Southern Tank Farm Area covers approximately 2,448 ft^2. A new Used Oil/Industrial Wastewater Storage Area (UOIWWSA) covering 10,400 ft^2 was added in 2005 and started service January 19, 2007.

The MTFSA has 16 tanks, each with a capacity of 30,000 gallons, for storage of finished product (used oil), unprocessed used oil (used oil), and diesel fuel. Tanks 2, 3, 4, 5, 6, and Tanks 8 through16 contain used oil. Tank 2 contains marine diesel/diesel fuel. Tank 7 contains petroleum contact water (PCW). The South Tank Farm has three tanks, each with a capacity of 20,000 gallons, for receiving industrial wastewater. The South Tank Farm also has a stormwater tank with a capacity of 14,100 gallons. The tank numbers are RS1 through RS3 (17 through19). The stormwater tank is Tank 53. The South Tank Farm also has a 1,128-gallon diesel fuel tank, which is Tank 49.

The North Tank Farm has four tanks, each with a capacity of 20,000 gallons, for receiving industrial wastewater or antifreeze. The tank numbers are RN1 through RN4 (20 through 23). The North Tank Farm Area also has a stormwater tank, which is Tank 52, with a capacity of approximately 9,400-gallons. The North Tank Farm Area has a 20,000-gallon antifreeze tank, which is Tank 22.

The Southern Tank Farm Area has eight tanks each with a capacity of 30,000 gallons. The tanks are numbered RSS1 through RSS8 (23 through 30). These tanks are used to store used oil.

The UOIWWSA has two tanks, each with a capacity of 159,000 gallons. The tanks are numbered 50 and 51. Tank 50 is used to store used oil and Tank 51 is used to store industrial wastewater. This permit does not regulate Tanks 17, 18, 19, 20, 21, 23, 50, 51, 52, 53, and 63 as they contain industrial wastewater, stormwater, or antifreeze.

DRUM/SLUDGE WAREHOUSE FACILITY

The bermed warehouse/drum storage area located along the south section of the processing plant is approximately 10,000 ft². The chemical storage area is located within this zone and is situated within the above-mentioned containment. The area of the warehouse/drum storage unit and used oil filter transfer area is approximately 10,000 ft². Used oil filters are transferred to roll-off boxes for bulk shipment for offsite processing or disposal.

SOLID WASTE MANAGEMENT AREA (SWMA)

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

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

The total number of employees at the site is 13. The office staff includes: one receptionist, one Plant Manager, and one General Manager. The number of field personnel may vary according to scheduling and workloads.

PROCESS FLOW

Prior to scheduling a load to be received, S-K requires a specific amount of information be provided about the incoming waste stream. Specific procedures maintained at the site cover this protocol.

RECEIVING/PROCESSING AREA

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

The MTFSA contains sixteen 30,000-gallon aboveground storage tanks (ASTs) located in a secondary containment area. The ASTs are used to receive used oil, processed marine diesel oil, processed DHO, petroleum contact water, industrial wastewater and virgin diesel fuel. The tank numbers are 1 through 16. The South Tank Farm has three tanks, each with a capacity of 20,000 gallons for receiving industrial wastewater. The tank numbers are RSI through RS3 (17 through 19). The North Tank Farm has four tanks, each with a capacity of 20,000 gallons for receiving used oil (3 through 20, 21, and 23) or antifreeze (1 through 22). The tank numbers are RN l through RN 4 (20-23).

The Southern Tank Farm area has eight tanks, each with a capacity of 30,000 gallons. The tanks are numbered RSSI through RSS8 (23 through 30) and are used to store used oil. The UOIWWSA contains two tanks, each with a capacity of 159,000 gallons. The tanks are numbered 50 and 51. Tank 50 stores used oil and Tank 51 is used to store industrial wastewater. Used oil is separated from water content by physical and/or chemical means. The wastewater is then transferred to a permitted offsite industrial wastewater pretreatment facility. A shaker or filter is used to separate solids from used oil. The remaining used oil is then further processed within this area via chemical and

physical means. Blending also occurs within this area. An S-K personnel performs analyses using equipment in the laboratory or sends the sample offsite to be analyzed.

INDUSTRIAL WASTEWATER STORAGE AREA

Location of the UOIWWSA is shown in Figure 1. UOIWWSA is comprised of two 159,000-gallon storage tanks, a loading/unloading area and transfer pumps.

REBUTTABLE PRESUMPTION

S-K and/or any contracted used oil transporter tests all loads destined for the S-K facility for total halogens both by a TIF Instruments Halogen Detector and a Dexsil® Halogen Test Kit or their functional equivalents. Any used oil found which demonstrates hazardous characteristics by testing greater than >1,000 parts per million (ppm) for total halogens and does not meet the rebuttable presumption is handled as hazardous waste according to 40 CFR Parts 260 through 266, 268, 270, and 124.

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

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

TRANSPORTATION

All used oil is tested as described above. All used oil accepted by S-K vehicles is delivered to the S-K facility for processing. S-K complies with all U.S. Department of Transportation regulations as described in 49 CFR 100-199, which are applicable to S-K standard operation(s). Each S-K vehicle utilizes for transporting used oil contains a

Transportation Contingency Plan, cellular/two-way radiophone, fire extinguisher, and Spill Containment Kit. All drivers are trained as per *S-K's Used Oil Transporter Training Program* and as required by 40 CFR Part 112. If a spill occurs, S-K takes immediate action as described within the SPCC Plan and as required under 40 CFR Part 279.43 (2 through 5).

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

The loading and unloading area for the warehouse is where drums and other containers of waste are transferred to the facility. These transfers occur inside the building and are within a secondary containment area.

STORAGE TANKS

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

FACILITY STANDARDS

S-K maintains an internal communications system consisting of: telephones, pagers, cellular phones, audible alarms, and electrical alarms. Fire extinguishers (portable type) are located within the control booth and at each exit/entrance and every 50 linear feet. All facility equipment is tested and/or inspected regularly. Copies of inspection/testing

documentation are provided in the SPCC Plan. Housekeeping is implemented as required by S-K personnel to ensure adequate aisle space for the unobstructed movement of spill personnel and equipment. All local authorities have received a copy of S-K's SPCC Plan and Contingency Plan.

SOLID WASTE GENERATED ONSITE

A written waste determination with supporting analytical information is completed on each solid waste stream generated onsite each year.

SOLID WASTE GENERATED OFFSITE

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

RE-REFINING PROCESS

The initial step in the re-refining process is to bring the hot gas generator up to operating temperature. The hot gas is used to operate the dehydrators and the re-refining unit. The used oil is initially pumped into the bottom tank which is a heat exchanger used to preheat the used oil and recover energy. The preheated used oil is stored in the day tank. The used oil is transferred to the dehydrator for the removal of water. The dehydrated used oil is stored in the dehydrated used oil tank. The dehydrated used oil is then transferred into the re-refining unit where the used oil is cracked into smaller length hydrocarbon molecules. The marine diesel fuel is condensed using a selective fractional condensing unit. The light ends are condensed in the bottom tank and are transferred to the used oil light ends tank. The lights ends can be used for fuel to feed the hot gas generator. The marine diesel fuel is collected in two tanks. The marine diesel fuel is then pumped to the storage tanks in the tank farm. The re-refining process can also be

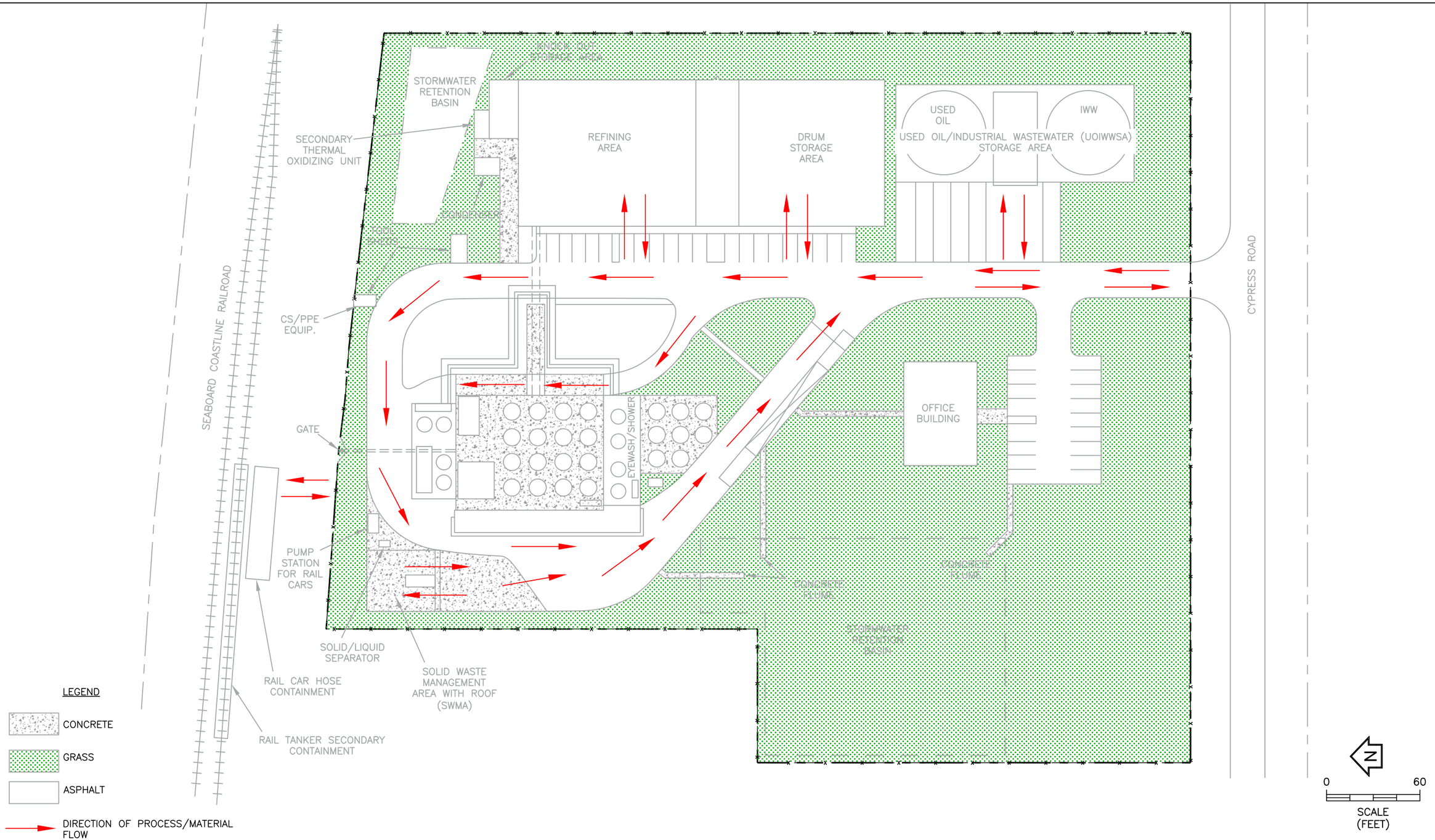

FIGURE 2.
PROCESS FLOW
SAFETY–KLEEN SYSTEMS, INC.
OCALA, FLORIDA

Sources: Engineering, Inc., 2007; ECT, 2012.

ATTACHMENT C

FACILITY ANALYSIS PLAN

USED OIL INCOMING AND OUTGOING SHIPMENTS

PURPOSE/SCOPE

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

SAMPLING PLAN

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

SAMPLING INTERVALS AND FREQUENCY

A Retain sample is taken from each container at each new and existing customer location. The S-K representative will use the TIF Halogen detector to screen the sample for halogenated constituents. If the TIF indicates the presence of halogenated materials by alarming, the S-K representative pulls a representative sample to perform Dexil® Chlor-D-Tect analysis. The S-K representative then performs a field Halogen screening consisting of the use of a Dexil® Chlor-D-Tect 1,000 parts per million (ppm) kit, or an equivalent methodology. If the chlorine (Halogens) field screening fails, the S-K representative pulls a representative sample to send to the S-K laboratory for analysis as a customer certification.

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

If the detector alarm sounds, possibly indicating that a hazardous waste has been mixed into the used oil, the driver does not load the fluid, and Chlor-D-Tect collects a sample and forwards it to the laboratory for testing. This sample is identified as a Check Sample.

After daily collections, each driver takes a sample of the contents of the truck as he/she off-loads into S-K tanks/tankers. These retain samples are held at the S-K facility until the outbound sample clears laboratory testing. If the facility utilizes transfer tanks, then each is sampled and retained at the facility until the outbound tank clears. Contents of the transfer tanks may be transferred to and commingled with the contents of other transfer tanks into outbound tanks.

In some cases, S-K leases railcars for transportation purposes. In these cases, the driver pulls individual daily truck retain samples and loads the railcar until it is properly loaded

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

RECORDS RETENTION

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

METHODS OF ANALYISIS

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

Certification Samples:

Ignitability.....EPA SW846-10 10
Water.....ASTM D-1744
Arsenic.....EPA SW846-6010
Cadmium.....EPA SW846-60 10
Chromium.....EPA SW846-6010
Lead..... EPA SW846-60 10
Total Chlorine (Halogens).....EPA SW846-9075
Sulfur..... EPA SW846-9075
PCB.....EPA SW846-8082

Check Samples:

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

Outbound Samples:

Ignitability.....EPA SW846-101O
Water.....ASTM D-I744

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

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

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

REBUTTABLE PRESUMPTION

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

In the event that sufficient knowledge of the source of the used oil is available to ascertain that halogenated hazardous waste has not been added to the used oil, then S-K documents this knowledge using the form in Attachment B or similar, and uses it as the basis to rebut the presumption that the used oil contains significant concentrations of hazardous halogenated waste. Knowledge of the source or process is gained through customer certification, periodic recertification, site visits, and/or customer analysis of samples.

Used oil received from a public collection program that does not receive waste from businesses can have the waste determination documented by a statement from the generator. Waste determinations from businesses require that generators use "product" or "process" knowledge with appropriate documentation. Generator knowledge or "acceptable knowledge" includes "Process Knowledge" and the facility's records of

analysis preformed before the effective date of RCRA regulations, or a combination of these with actual chemical analysis of the waste. "Process knowledge" could constitute acceptable knowledge when detailed information on the wastes is obtained from existing published or documented waste analysis data or studies conducted on waste streams generated by processes similar to that which generated the waste.

Acceptable knowledge of a waste stream is relied upon when:

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

If sufficient generator knowledge is not available to rebut the presumption, then outside laboratory analyses is performed and documented to determine if significant concentrations of hazardous halogenated constituents are present in the used oil. These analyses are EPA SW846-8260B Volatile Organic Compounds by GC/MS, and EPA SW846-8270C Semi-volatile Organic Compounds by GC/MS. Acceptance of used oil containing greater than 1,000 ppm of a halogenated hazardous constituent listed in Appendix VIII is determined by S-K on a case-by-case basis; but in no case will used oil be accepted with analytical results showing a halogenated hazardous Appendix· VIII constituent present at a concentration of 1,000 ppm or greater (Ref. 50 FR 49176-49177 regarding use of the rebuttable presumption and the evaluation of "significant levels" of halogenated hazardous constituents). If found to be rebuttable, S-K directs the used oil into the on-specification fuel oil or used oil processing streams only if total Halogens are below 4,000 ppm. However, if the used oil is found to contain significant concentrations of halogenated hazardous constituents, S-K handles it as hazardous waste in accordance with subpart H of 40 CFR 266.

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

DETERMINATION OF USED OIL SPECIFICATIONS

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

S-K Used Oil Classification

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

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

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

the procedures regarding field testing (halogen screening, Chlor-D-Tect, etc.) are the same as for an automotive generator.

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

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

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

that exceeds on-specification requirements, and other factors that may be relevant to the case at hand.

ANALYSIS PLAN REVIEW

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

B. NONHAZARDOUS WASTE STREAMS

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

GENERATED WASTES

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

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

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

All analyses are requested via S-K's Chain-of-Custody (COC) document. Each sample submitted for analyses is recorded on S-K's Sample Receiving Log. All analytical results are recorded in S-K's computer database and hard copies are provided for generator files. The facility is a Conditionally Exempt Small Quantity Generator that produces less than 100 kilograms per month of hazardous waste.

C. SOLID WASTE RECEIVED FROM OFF SITE

Solid waste streams received from offsite are profiled into the facility. Only nonhazardous waste is accepted by S-K. The generator is required to make a nonhazardous waste determination based upon product knowledge or analytical information or both for the waste to be processed by S-K. Generator knowledge or "acceptable knowledge" includes "Process Knowledge" and the facility's records of analysis preformed before the effective date of RCRA regulations, or a combination of these with actual chemical analysis of the waste. "Process knowledge" could constitute acceptable knowledge when detailed information on the wastes is obtained from existing published or documented waste analysis data or studies conducted on waste streams generated by processes similar to that which generated the waste. Table C-1 is used to determine if a waste is a characteristic hazardous waste.

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

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

ATTACHMENT C-1

USED OIL CRITERIA

SAFETY-KLEEN
WASTE MATERIAL PROFILE

Customer #: _____ *Analytical Part #:* _____ ***PROFILE #:*** _____

Sales Name: _____ *Employee #:* _____ *Rep Email:* _____ *LOB #:* ☐28 ☐26 ☐24 ☐20 ☐19

Location/Branch #: _____

A. CUSTOMER INFORMATION ☐ *Check if Billing Same*

Generator _____ *Billing Company* _____

Facility Address (No P.O. Box) _____ *Billing Address* _____

_____ *City/State/Zip* _____

City/State/Zip _____ *Billing Contact* _____

Technical Contact _____ *Phone* _____ *FAX* _____

Phone _____ FAX _____ *Email* _____

NAICS # _____ ☐ CESQG ☒ SQG ☐ LQG EPA ID# _____ State ID# _____

B. SHIPPING INFORMATION

US DOT Shipping Name _____

Hazardous Class/Division # _____ UN/NA # _____ Packing Group _____ RQ _____

Size _____ Container Type _____ Quantity _____ Frequency _____

C. GENERAL MATERIAL & REGULATORY INFORMATION

Name of Material _____

Process Generating the Material _____

Yes	No		Yes	No	
☐	☒	Regulated or Licensed Radioactive Waste	☐	☒	Contains UHCs/Constituents of Concern: List in section D
☐	☒	Regulated Medical/Infectious Waste	☐	☒	Exempt Waste: If yes, list ref. 40 CFR _____
☐	☒	Waste Subject to Benzene NESHAP regulations	☐	☒	*For Artesia, MS*: Does waste material contain, or is derived from, dioxin-listed wastes with F020-F023 or F027 waste codes?
☐	☒	TSCA Regulated PCB Waste: List PCB level in section D	☐	☒	State Hazardous Waste: List Codes _____
☐	☒	Regulated Ozone Depleting Substance	☐	☒	EPA Hazardous Waste: List Codes _____
☐	☒	CERCLA Regulated (Superfund) Waste			Source Code G _____ Form Code W _____ Mgt. Method H _____

D. MATERIAL COMPOSITION (Range Total > or = 100%) or ppm

	100
☐ MSDS Attached	**Total:**

E. REACTIVE CHARACTERITSTICS

Yes☐ No☐ React. Sulfides _____ ppm

Yes☐ No☐ React. Cyanides _____ ppm

Yes☐ No☐ Water/Air (Pyrophoric) React.

Yes☐ No☐ Oxidizer

Yes☐ No☐ Shock/Explosive

Yes☐ No☐ Polymerizable

Yes☐ No☐ Other-Comments

Elemental Constituents (ppm):

☐ No detectable Elements Sb _____ As _____ Ba _____

Be _____ Cd _____ Cr _____ Pb _____ Hg _____

Ni _____ Se _____ Ag _____ Tl _____ V _____

Metals Data based on: ☐TCLP ☐Total Analysis ☐Generator Knowledge (no testing)

F. PHYSICAL CHARACTERISTICS

Flash Point: _____ °F (if <73°F)

☐ 73-<100 ☐ 100-141 ☐ 142-<200 ☐ ≥200

pH Range: ☐ ≤2 ☐ >2-4 ☐ >4-10 ☐ >10-<12.5 ☐ ≥12.5

Phases _____ % Liquid _____ Viscosity cps _____

% Sludge _____ % Solid _____ % Halogens _____

BTU's/lb: _____ Specific Gravity: _____

G. COMMENTS _____

Customer Restrictions: ☐ Yes ☐ No

H. GENERATOR'S CERTIFICATION

I hereby certify that I am an authorized agent of the generator, and warrant on behalf of the generator that the information supplied on this form and on any attachments or supplements hereto is complete and accurate, and that all known or suspected hazards of the material(s) described herein have been disclosed. I agree that if there is a discrepancy between the waste received and any information supplied on this form, that either Safety-Kleen or the generator may initiate further testing and evaluation in accordance with the terms and conditions of the contract between Safety-Kleen and the generator; that this profile certification may be amended accordingly; and that additional expenses incurred by Safety-Kleen in order to manage the waste in accordance with Federal, State, and Local regulatory requirements will be the sole responsibility of the generator, including the return of the material to the generator at generator's expense.

Generator Signature: _____ Printed Name and Title: _____ Date: _____

Used Oil Criteria

Definitions:
Used Oil-Waste that consists of any of the following materials, or any combination of them:

a. Lubricating oil after it has been used for its intended purpose.
b. Lubricating oil that in no longer suitable for its intended purpose.

Lubricating Oil-petroleum-derived or synthetic crankcase oil, engine oil, hydraulic fluid, transmission fluid, gear oil, heat transfer fluid, or other oil or fluid used for lubricating machinery or equipment.

Group 1 Oil Classification (Accept)

Petroleum crankcase or engine oil	Synthetic crankcase or engine oil	Hydraulic fluid
Transmission fluid	Power steering fluid	Gear oil
Re-refined oil	Turbine oil	Compressor oil
Chain oil	Rock drill oil	2 cycle oil
Way oil		

Group 2 Oil Classification (Used Oil Review)

Quenching oil	Mineral heat transfer fluid	Metal working oil
Rolling oil	Process oil	Emulsified oil
Cutting fluids	**All 3rd party collectors**	**pH <4 or >11**

Group 3 Oil Classification (Reject)

Electrical insulating oil/Transformer oil	Gasoline	Form release oil
Drip-less lube	Rust preventatives	Silicone heat transfer fluid
Synthetic aromatic hydrocarbon heat transfer		
Glycol-based hydraulic heat transfer	Water glycol hydraulic fluid	
Phosphate ester hydraulic fluid	Hydraulic oil dye	
Polyglycol synthetic compressor oil	Grease	Oil additives
Oil treatments	Diesel fuel treatment	Motor flushes
Winter start fluid	Brake fluid Undercoating	Penetrating oil
3 in 1 household oil	Aerosol propelled lubricant	Gun oil
Kerosene	Urethane coating	Sewing machine oil
Cooking oil	Windshield washer fluid	De-dusting oil
Crude oil	Bunker	Residual oils
Tank bottoms	Gasoline	Distillate fuels
Animal fats	TSCA regulated oils	2 cycle engine oil mixes

SAFETY-KLEEN CORP.
TECHNICAL CENTER

TITLE: STANDARD OPERATING PROCEDURE FOR THE SCREENING OF WASTE MATERIALS FOR SPENT HAZARDOUS HALOGENATED DEGREASING SOLVENTS USING TIF® HALOGEN DETECTORS™

(KEY WORDS: LISTED HAZARDOUS HALOGENATED DEGREASING SOLVENTS)
(BASED ON: TIF AUTOMATED HALOGEN LEAK DETECTOR™ *Owners Manual*)

1. SCOPE AND APPLICATION

1.1 Safety-Kleen Corp. uses the TIF® Halogen Detector™ to screen used oils on-site for spent hazardous halogenated degreasing solvents before accepting them from the generator. Used oils testing positive using the TIF detector are then screened for total halogens at 1000 ppm using the Dexsil Chlor-D-Tect test kits (SK 9810).

1.2 Used oils testing positive for total halogens at 1000 ppm are presumed by EPA to have been mixed with listed hazardous halogenated degreasing solvents, and are thus hazardous wastes themselves unless the presumption of admixture can be rebutted by instrumental analysis (i.e., GC/ECD analysis by SK 9209).

2. SAFETY AND WASTE HANDLING

2.1 **Fire** – Some of the materials are highly flammable. Be sure there are no open flames nearby while testing or cleaning is going on. The fumes released may be flammable and migrate to open flames.

2.2 **Eye Contact** – Regular safety glasses with side shields provide adequate protection from an accidental sample splash.

2.3 **Hand Contact** – Use of disposable nitrile gloves provide adequate protection from contact with the samples. All skin contact must be washed off immediately.

2.4 **Respiratory** – Exposure to the vapors from the sample should be kept to a minimum by working in a well-ventilated area. A fitted respirator must be available for use in case of sample spills.

3. SUMMARY OF METHOD

3.1 Used oils are screened for the presence of spent hazardous halogenated degreasing solvents using the TIF halogen detector, at the generator's site before combining with used oil from other generators. The used oil may be tested in-situ, i.e., in the generator's container (e.g., drum, tank, etc.) if the container is closed and it is known that the headspace has not recently been disturbed. Conditions must also be conducive to testing (i.e., the temperature of the oil must be must be above 50°F and wind must be gentle enough not to disturb the concentration of the vapors in the headspace.)

3.2 When conditions do not allow for in-situ testing, a representative sample of the waste is transferred to a 4-oz. wide-mouth jar, capped and shaken in a warm and protected environment (e.g., an office or truck cab, etc.).

3.3 In either sample situation, the used oil is screened for the presence of spent hazardous halogenated degreasing solvents by inserting the probe of the TIF halogen detector into the headspace in equilibrium with the used oil and the vapors evaluated. Positive results are indicted by a constant rapid "beeping" and/or illumination of a number of light emitting diodes (LEDs) on the instrument.

4. SAMPLE HANDLING AND PRESERVATION

4.1 When screening is performed in a sample jar rather than in-situ, the sample must be held between 50°F and 90°F and protected from gross air movements (e.g., wind).

4.2 Since this is a field screening method performed in "real time" on site at the time of pick-up, no sample preservation is required.

5. INTERFERENCES

5.1 The temperature of the used oil affects the volatility of the halogenated solvents. High temperatures (> 100°F) may cause false positives due to excessive concentrations of hydrocarbon vapors in the headspace, while low temperatures (< 45°F) decrease the volatility of the halogenated solvents increasing the possibility of false negatives. Therefore, all used oils must be screened at a temperature between 50°F and 90°F.

5.2 Any compound with a high enough volatility and electron affinity has the potential to interfere with the test, giving a false positive. The presence of certain vapors such as water, ethylene glycol (antifreeze) or gasoline, pose the possibility of interfering in this way. Since all used oils testing positive using the TIF detector are subsequently screened for total halogens at 1000 ppm using the Dexsil Clor-D-Tect test kits, false positives due to non-halogenated contaminants are eliminated.

5.3 False negatives may result from "zeroing" the instrument in the presence of halogenated solvents, essentially reducing the sensitivity of the instrument. This procedure provides for zeroing the instrument in controlled atmospheres thus not only calibrating the instrument to detect the target solvents of interest but also reducing the likelihood of false negatives.

6. APPARATUS

6.1 **TIF® Automatic Halogen Leak Detector™** – Mandatory.

Any of the following models are acceptable – TIF 5650A or TIF RX-1A (Granger # 3BY18). Replacement tips: TIF XP-2 (Granger # 4YT91).

Available from: SPX Corporation, 655 Eisenhower Drive Owatonna, MN 55060
Phone: 800-327-5060 Web Site: www.tif.com

OR

Granger: Phone: 1-800-323-0620. Web Site: www.granger.com.

WARNING: Do not use any type of Heated Pentode™ refrigerant leak detectors (e.g., the TIF ZX-1) to screen used oils as these detectors are able to ignite flammable vapors and therefore pose a fire/explosion hazard when used in association with any volatile organic material.

6.2 **4-Ounce Wide-Mouth Sample Jars** – Available form ALLPAK (PT# 8855). Corporate One West, 1195 Washington Pike, Bridgeville, PA 15017, Ph: 412-257-3000, Fax: 412-257-3001.

6.3 **Disposable Gloves** – N-Dex® 4 mil Nitrile Gloves, (Fisher Cat. # 11-388-32). Ph: 800-766-7000, Fax: 800-926-1166, Web site: www.fishsci.com.

7. REAGENTS

7.1 Zeroing Material (Optional) –Fill a 4-oz jar half-full with virgin motor oil and cap. This is to be used for zeroing the instrument when screening used oils. For zeroing the instrument when screening oily waters, an approximately 90% water/10% oil zeroing material may also be prepared.

7.2 Instrument Verification Material (Mandatory) – Fill a 4-oz jar half-full with Safety-Kleen Clear Choice Cleaning Solvent (i.e., acetone) and cap.

8. PREVENTIVE MAINTENANCE

WARNING: Turn unit off before cleaning or replacing the sensing tip. Failure to do so may result in a mild electrical shock.

8.1 Keep The Sensing Tip Clean – Prevent dust, moisture and grease build-up by utilizing the provided tip protector. The tip protector should be cleaned with a cloth on a regular basis to provide adequate tip protection. Note that a small round filter cloth is located in the top of the tip protector used on the TIF 5650A. The protector should be replaced when the filter cloth becomes worn or clogged from use.

8.2 Sensing Tip Replacement – The tip will eventually wear out and require replacement. It is difficult to predict exactly when this will occur since tip longevity is related to the conditions and frequency of use. The tip should be replaced whenever the beep rate increases in frequency or becomes erratic even in a clean, pure, air environment, or when it does not respond to the instrument verification material (i.e., Safety-Kleen Clear Choice Cleaning Solvent). To replace the tip, make sure the unit is in the OFF position. Remove the old tip by unscrewing in a counter-clockwise direction. Use the replacement tip, located in the battery compartment, and screw it on in a clockwise direction until finger tight. Order a replacement back-up tip.

8.3 Batteries Affect Unit Performance – When the selector switch is in the ON position the appropriate power indicator light should be on. If the light does not come on, two new and/or tested size "C" Alkaline batteries should be installed. Batteries must supply at least 2.2 volts (under load) to light the power indicator light and operate the unit. Always check battery voltage under load; remove battery cover and turn unit on, measure voltage across the batteries.

NOTE: Low temperatures will affect battery voltage.

9. TROUBLESHOOTING/CORRECTIVE ACTION

9.1 A troubleshooting chart giving solutions to common problems is attached as Appendix 1.

10. QUALITY CONTROL

The TIF must be zeroed and its operation verified at each customer's site utilizing the following procedures:

10.1 **Zeroing** – Turn on the unit in the cab of the truck or in an outside area way from the customer's waste. Allow the unit to stabilize (zero) for five or six audible beeps.

10.2 **Instrument Verification** – Test the TIF meter for proper operation by inserting the TIF probe into the headspace of a jar containing Safety-Kleen Clear Choice Cleaning Solvent (i.e., acetone). A positive response (3 or more lights for the Model 5650A or 6 or more lights for the RX-1A) indicates that the detector is working properly. A negative response indicates that the TIF unit is not working properly and cannot be used.

11. PROCEDURE

WARNING: Do not use any type of Heated Pentode™ refrigerant leak detectors (e.g., the TIF ZX-1) to screen used oils as these detectors are able to ignite flammable vapors and therefore pose a fire/explosion hazard when used in association with any volatile organic material.

11.1 **Instrument Zeroing and Verification** – Prior to screening used oils for the presence of spent hazardous halogenated solvents, the unit must be zeroed and its operation verified according to the procedure below.

11.1.1 **Zeroing** – The unit must be zeroed in the cab of the truck or in an outside area free from any sources of halogenated organics.

Optionally, the unit can be zeroed over the headspace of a virgin oil/oily water sample to eliminate false positives associated with oil and water vapors. Select the appropriate instrument zeroing jar (i.e., with or with out ~10% water), open the jar and immediately insert the detector sensor probe into the jar, ¼" above the surface of the oil, and turn the unit on. The unit should "beep" at a slow and steady rate. Leave the unit on and allow it to stabilize for 5 or 6 beeps.

11.1.2 Verification – Open the instrument verification jar and immediately insert the detector sensor probe into the jar, ¼" above the surface of liquid. The unit should respond to this material with greater than or equal to the threshold response of a noticeably increased beeping rate and/or the illumination of three (TIF 5650A) or six (TIF RX-1A) light emitting diodes (LEDs).

11.2 Screening – After zeroing and verifying the operation of the unit, used oils may be screened either in the headspace of the customer's container or by transferring a representative sample to a 4-oz. wide mouth sampling jar. In either case, all screening must be performed in an environment conducive to testing, i.e., the integrity of the sampling headspace must be maintained while testing and the temperature of the oil must be between 50°F and 90°F.

11.2.1 If the headspace of the customer's used oil container is closed and has not recently been disturbed, and there is no wind, the used oil may be screened in the existing headspace of the customer's container (e.g., drum, tank, etc.). Open the bung hole or sampling port of the container, insert the instrument sensing probe with minimal introduction/dilution with outside air, and observe the instrument response.

11.2.2 If the headspace of the customer's used oil container is not closed or has recently been disturbed, or the environment is not conducive to testing (i.e., it is windy or the oil's temperature is not between 50° F and 90° F), the oil must be sampled and tested in a 4-oz. sample jar in a protected environment (e.g., an office or truck cab). Obtain a representative sample of the used oil and transfer to a clean sample jar and fill to approximately one-half (½) full. Cap and shake the sample. Allow the sample to settle. Remove the cap, insert the sensor probe to one-quarter of an inch (¼") above the surface of the sample and observe the instrument response.

NOTE: Be careful not to allow the probe to touch the sample liquid or droplets on the container wall. Touching the probe to the liquid will necessitate disassembling and cleaning the probe and/or replacing the tip.

11.2.3 No change in the units beeping rate or no illumination of LEDs or a response less than the threshold response, indicates that the used oil is free from admixture with halogenated solvents and may be accepted. An increase in the beeping rate and/or an illumination of more then the threshold number of LEDs (3 for the TIF 5650A and 6 for the TIF RX-1A) indicates the presence of halogenated solvents and the used oil should be further evaluated using a Dexsil Clor-D-Tect test kit (SK 9810).

12. CALCULATIONS

12.1 None required.

13. REFERENCES

13.1 **OWNERS MANUAL**, AUTOMATED HALOGEN HFC/CFC/HCFC LEAK DETECTOR™, TIF INSTRUMENTS, INC., Miami FL 33150.

13.2 **Safety-Kleen Internal Memo** – *Safety-Kleen's Use of TIF Halogen Leak Detectors for Screening Used oil for Admixture with Spent Hazardous Degreasing Solvents,* Vincent Donndelinger.

13.3 **Safety-Kleen Internal Study** – *Summary of TIF Leak Detector Testing*, Margaret Moran, November 23, 1999.

13.4 **Safety-Kleen Internal Study** – *Evaluation of TIF RX-1A Leak Detector*, Kathleen Schaeflein, June 24, 2002.

Appendix 1

Troubleshooting Chart

UNIT	PROBLEM	CAUSE	CORRECTION
All Units	Erratic and/or continuous beeping signal.	Dirty tip, filter, or protector.	Replace or clean tip, filter, or protector.
All Units	Erratic and/or continuous beeping signal.	Low Battery Condition.	Check power light and voltage. Replace batteries if needed.
All Units	Reduced sensitivity.	Tip is worn out.	Replace tip.
5650A	Probe Pump runs but unit does not beep.	Batteries reversed.	Remove and correct.
All Units	Unit will not detect a known presence of halogenated solvent.	Tip is worn out.	Replace tip.
All Units	Unit will not detect a known presence of halogenated solvent.	Low battery condition.	Check power light and voltage. Replace batteries if needed.
All Units	Unit will not detect a known presence of halogenated solvent.	Zeroed in the presence of elevated concentrations of halogenated solvents.	Reset unit in a clean atmosphere.
RX-1A	Red LED is dim or is not lit	Low battery condition	Replace batteries

SAFETY-KLEEN CORP.
TECHNICAL CENTER

METHOD #: 9812
REVISION: 08/10
SUPERSEDES: 05/09

ATTACHED IS A DOCUMENT FOR: **REVISION**

Date: 08/31/10

TITLE: STANDARD OPERATING PROCEDURE FOR THE SCREENING OF WASTE MATERIALS FOR SPENT HAZARDOUS HALOGENATED DEGREASING SOLVENTS USING TIF® HALOGEN DETECTORS™

(KEY WORDS: LISTED HAZARDOUS HALOGENATED DEGREASING SOLVENTS)
(BASED ON: TIF AUTOMATED HALOGEN LEAK DETECTOR™ *Owners Manual*)

SERIES/SUBJECT

9000 Analytical Methods
9800 General Methods – Inorganic

COMMENTS:

INITIATOR - Safety-Kleen is phasing out the 105 parts washer solvent used to validate the TIF detector is working properly. As such, the SOP has been revised to allow for the use of Safety-Kleen Clear Choice Cleaning Solvent (i.e., acetone) during the instrument verification procedure.

Rick Haskins
August 31, 2010

DEPARTMENT MANAGER(S) –

TECHNICAL INFORMATION SPECIALIST –

SAFETY-KLEEN CORP.
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9000 Analytical Methods
9800 General Methods – Inorganic

APPROVALS:

ATTACHMENT C-2

OIL AND ANTIFREEZE COLLECTION PROCEDURES

Oil and Antifreeze Collection Procedures

MARKETING

Division/Department: Marketing
Contact: Alan Israel (847) 468-6787
Procedure: M410-005
Revision: 17
Revision Date: **September 1, 2011**
Supercedes: July 16, '11
Issue Date: July 1, '99

Approved: Matt Gudorf/Bill Ross/Lin Longshore
PROPRIETARY AND CONFIDENTIAL

Purpose:

The purpose of this procedure is to provide instructions for the collection and proper management of bulk used oil, antifreeze, and any fuel not specifically exempted as a commercial chemical product. **For procedures relating to bulk approvals of commercial chemical fuels (CCF), see BOG M430-011 Bulk Commercial Chemical Fuels.**

Scope:

This procedure applies to all U.S. Safety-Kleen branches.

Responsibilities:

Branch General Managers	Ensure that the oil and antifreeze collection procedures are implemented in their branch.
Sales Specialists	Sell and develop oil and antifreeze collection services. Collect samples for pre-qualification and for rebuttal analysis.
Oil Sales and Service Representatives	Collect oil and antifreeze from customers, obtain retain samples, and perform screening tests.
Environment Health & Safety Managers	Provide regulatory guidance to branch personnel.

Definitions:

CESQG	A customer that generates less than 220 lbs of hazardous waste in any single month.
COLIWASA	A sampling tool used to sample free-flowing liquids and slurries in containers and tanks. Especially useful for sampling waste that consists of several liquid phases.
Composite Sample	A sample created by mixing two or more samples together.

Customer Retain Sample — A grab or composite sample of oil/antifreeze taken from every container or tank at a customer's site. Retain samples are used to identify the source of contamination if found in an oil/antifreeze load.

Grab Sample — A sample taken from a single point.

Headspace — The vapor mixture trapped above a liquid in a sealed tank, container, or sample jar.

High Risk Sources — Sources of used oil or antifreeze that may represent a high risk of contamination such as PCBs, silicon, chlorinated solvents, or any other contaminants that Safety-Kleen is not permitted to handle through the SKOS program. These include, but are not limited to, used oil/antifreeze from the following sources:

1. electrical service, repair, and utility facilities
2. **all non-automotive used oil stored in drums**
3. generators that have previously been identified as being high risk waste generators
4. generators with used oil/antifreeze that contain detectable levels of PCBs (2 ppm or greater)
5. generators whose used oil has failed the Dexsil Clor-D-Tect test.
6. "Do-It-Yourself" (DIY) storage tank/container sites that have no controlled access
7. scrap yards/junk yards - includes, but is not limited to a facility that:
    - salvages scrap metal of any kind,
    - processes scrap metal,
    - stores scrap metal,
    - crushes or shreds automobiles,
    - dismantles automobiles or refurbishes industrial equipment such as hydraulic machines and electrical transformers, or
    - dismantles ships.
8. sewage treatment plants
9. third party oil collectors where the waste composition varies over time depending on the original source
    - oil purchased from a vendor (customer) who is actively collecting, buying or brokering used oil/oil filters from outside sources.
10. dismantling of an old plant
11. source or generator is unknown, irregular or cannot be verified
12. oil or antifreeze that exhibits unusual characteristics

LQG — A customer that generates more than 2,200 lbs of hazardous waste in any single month.

PCB — A chemical highly regulated by EPA. Safety-Kleen cannot manage PCBs under the Oil and Antifreeze Collection Program.

Pre-qualification (Prequal)	Detailed laboratory analysis of a used oil/antifreeze sample performed at the East Chicago Lab. A subsequent evaluation is performed by the SK Waste Approval Group in Elgin before the oil/antifreeze can be picked up.
SQG	A customer that generates less than 2,200 lbs of hazardous waste in any single month.
Truck Retain Sample	A grab sample taken from an oil truck before it is unloaded.
Used Antifreeze	Any liquid containing ethylene/propylene glycol or alcohol that has been used for engine cooling or heating systems.
Used Oil	Any oil that has been refined from crude oil or any synthetic oil that has been contaminated by physical or chemical impurities during the use of the oil. Used oil is federally regulated under RCRA Regulations **found in 40 CFR 279** and associated state regulations. For the purposes of this BOG, "used" and "waste" oil are considered the same thing, and "used" oil will be the term used throughout this procedure. Petroleum hydrocarbons used as solvents are specifically excluded from the definition of used oil.
Utility	Any electrical power generating location, including automotive and industrial maintenance repair activities.

Forms:

Dexsil Deactivation and Disposal Procedure	A procedure to deactivate expired unused Dexsil Clor-D-Tect 1000 halogen test kits.
Halogen Screen using TIF Halogen Detectors	A laboratory SOP with instructions for using the TIF Halogen Detectors.
Oil Services Flow Chart: Automotive	A flow chart illustrating the procedures for collecting used oil/antifreeze at an automotive customer.
Oil Services Flow Chart: Non-Automotive	A flow chart illustrating the procedures for collecting used oil/antifreeze at a non-automotive customer.
Oil Services Flow Chart: High Risk Sources	A flow chart illustrating the procedures for collecting used oil/antifreeze from a high risk oil/antifreeze customer.
Part Numbers and Ordering Information	Additional useful information.
PCB/Silicon Sample Record	A form used to document the PCB/Silicon analysis performed on oil/antifreeze samples from high risk sources.
SKOS Acceptance Criteria	Used to determine what types of oil are acceptable or unacceptable under this program.

Overview:

These procedures are based on US EPA regulations for collection and transportation of used oil and antifreeze. According to EPA and many states, used oil and antifreeze are not a hazardous waste. Some states do regulate used oil and antifreeze as hazardous waste. If your state regulates used oil or antifreeze as a hazardous waste, a hazardous waste manifest will be required for transportation. Your EHS Manager will provide guidance on your specific state.

The **SKOS Acceptance Criteria** should be used to determine which oil types can be approved into the SKOS program. Used oils listed under Group 1 **are considered acceptable** and will be approved as long as they meet the permit and acceptance conditions specified by Safety-Kleen's oil refineries and the appropriate oil collection procedure is followed. Used oils listed under Group 2 **may be considered acceptable**, if they receive approval from the Used Oil Review Panel (UORP) and meet all the other permit and acceptance conditions specified by Safety-Kleen's oil refineries and the appropriate oil collection procedure is followed. Used oils listed under Group 3 **will not** be accepted into the SKOS program; however, they may be approved into another SK program such as the Containerized Waste Services (CWS) program. Used oils collected under the SKOS program are typically recycled or reused.

Note: Whenever possible, used oil and antifreeze approved for a refinery (East Chicago or Buffalo) **should be** segregated from materials approved for an oil terminal/depot.

Fuel oils such as diesel, heating oil, and kerosene are **not allowed** to be picked up under the procedures in this BOG. However, these materials can be managed through other Safety-Kleen programs.

Transfer of oil and/or oily water over a navigable waterway is not allowed under the procedures in the BOG. Unless your branch has been issued a specialized permit by the United States Coast Guard, it is against Federal regulations to transfer bilge water or any other oil or oily water from a vessel (cruise ship, cargo ship, tugboat, etc.) over a navigable waterway.

SERVICE RESPONSIBILITIES	
Sales Specialist (MSS, ISS, etc.)	**OSSR**
1. Take a sample for pre-qualification evaluations and rebuttal analysis and prepare them for shipment.	1. Complete service order and make SAM entries.
2. Complete waste profiles and PCB Control Forms for pre-qualification evaluations.	2. Verify that the customer has a valid pre-qualification approval if an approval is required.
3. Ensure that oil/antifreeze from the non-automotive category and high risk sources are pre-qualified before pick up.	3. Take samples of oil/antifreeze before pumping it onto the truck.
4. Contact the customer if there are problems with the oil/antifreeze or if additional lab analysis is needed.	4. Test the oil or antifreeze before pumping it onto the truck*.
	5. Reject the oil or antifreeze if it does not pass the test.

* The established disciplinary procedures will be implemented in response to spills due to truck overfills.

There are other Safety-Kleen BOGs and SOPs that govern the specific tasks described here. Persons involved in the collection of used oil/antifreeze must be aware of these and comply with the applicable procedures and requirements. These references are listed in this table.

DOCUMENT NUMBER	TITLE	PURPOSE
ET_143	Sampling Hazardous Materials and Wastes	A training course on how to take representative samples safely. (Provided by Training Department)
ET_170	Cargo Tank Operations	A training course for the operation of oil and vacuum trucks. This course covers truck operation and spill prevention procedures. This course must be successfully completed before any person operates a cargo tank truck.
ET_333	Rail Transport Non-Pressure Tank Cars	A training course covering the management of rail cars.
M430-001	Commercial Chemical Fuels	A BOG for collecting heating oil, diesel fuel, and kerosene.
M440-001	Contaminant Event Response Plan	A BOG that describes the procedures to follow if contamination is found in an oil/antifreeze load picked up by Safety-Kleen.
O310-008	Sampling Equipment and Technique	A BOG with more information on safe sampling and sampling equipment.
10-11-109-02	Handling Customer Profile Samples	An SOP governing sample management prior to shipment.
10-11-109-03	Shipping Customer Profile Samples	An SOP governing sample shipment.
10-11-109-04	Non-Conforming Waste	An SOP with procedures to follow when a waste is not as described or expected.
20-21-202-02	Used Oil Qualification	An SOP used to ensure the proper classification of used oil.
20-21-203-01	Customer Retain Samples	An SOP with additional detail on how to manage customer retain samples.
20-21-203-02	Truck Retain Samples	An SOP with additional detail on how to manage truck retain samples.
20-21-205-01	Response to Contaminated Oil or Vac Shipments	An SOP that describes procedures to follow if contamination is found in an oil or vac waste shipment picked up by Safety-Kleen.
20-21-206-01	Spill Prevention During Bulk Transfers	An SOP with procedures to prevent spills with loading and unloading tank trucks.
20-21-208-01	Calibration and Use of TIF Meters	An SOP that describes the use of the TIF meters.
SK9812	Halogen Screen Using TIF Halogen Detectors	A laboratory SOP with instructions for using the TIF.

Sample Collection Procedures

There are 3 different collection procedures. One is for oil/antifreeze collected from automotive categories, the second is for oil/antifreeze collected from non-automotive categories, and the third is for oil/antifreeze collected from high risk sources. The next table lists the required collection procedures for each. Specific requirements for Do-It-Yourself (DIY) oil collections can be found in **M410-008 Do-It-Yourself "DIY" Oil Procedures**.

Collection Requirement	Collection Procedure #1 Automotive Categories	Collection Procedure #2 Non-Automotive Categories	Collection Procedure #3 High Risk Sources
Pre-qualification Samples (Prequal) **Pre-shipment PCB and Silicon Samples**	**No**	**Yes** (results must be received prior to the **initial collection only**)	**Yes** (results must be received prior to the **initial collection only**) (PCB and Silicon results must be received prior to **each collection after the initial pre-qualification collection.**
Customer Retain Samples	**Yes**	**Yes**	**Yes**
Truck Retain Samples	**Yes**	**Yes**	**Yes**
Field Test Sampling for Halogens	**Yes**, for SQG & LQG only.	**Yes**, for SQG & LQG only.	**Yes**, for all generators
	Field testing is not required for antifreeze unless it is commingled with used oil.		
	Important note! Some States require field testing for all generators. Check with your EHS Manager for your State requirements.		

A pre-qualification sample may need to be taken for lead in antifreeze in some States. Check with your EHS Manager for your State requirements.

Third Party Oil Collectors - Branches are not authorized to collect used oil at a customer or accept used oil at the branch (including rail sites) from a third party oil collector unless approved by the Director of Byproduct Sales. To make a request, fill out the Third Party Certification form and e-mail it to thirdparty@safety-kleen.com**. This is only necessary for the initial approval of the vendor.** Oil purchased from a vendor (customer) who is actively collecting, buying or brokering used oil/oil filters from outside sources are considered third party oil collectors. 3rd party oil collectors are companies that collect oil from other businesses. They are not the original generator of the used oil.

Automotive Categories - Collection Procedure #1

Oil/antifreeze is considered automotive if it comes from one of the following categories:

A1 Body Shop
A2 Auto Maintenance
A3 Fleet
A4 Dealership
A5 Dealership - Heavy Equipment - RV
A6 Fleet - Utility
A7 Quick Lube
A8 Auto Retail
A9 Other - Auto

S1 Government
S2 K-12 & Vocational
S5 Military

No pre-qualification sample is required under this collection procedure. If the used oil is considered non-crankcase oil, a pre-qualification sample is required. If the used oil/antifreeze exhibits unusual characteristics (i.e. color, odor, etc.) it is considered to be from a high risk source.

Non-Automotive Categories - Collection Procedure #2

Oil/antifreeze is considered non-automotive if it comes from one of the following categories:

I1 Metal Fabrication
I2 Printing & Packaging
I3 Chemical Manufacturing
I4 Other - Industrial
I5 Metal Working
I6 Natural Resources

S3 Dry Cleaning
S4 Other - Specialty
S6 Higher Education & Medical
S7 Construction

If it seems like a segment code has been improperly assigned to a customer, follow the Segment Code Appeals Process.

A pre-qualification sample is required under this collection procedure and the results must be received prior to the initial collection. The results are valid as long as the process that generates the used oil/antifreeze has not changed. If the generating process changes or if no oil/antifreeze is picked up for over one year, the pre-qualification approval becomes invalid and must be renewed before the oil/antifreeze is picked up again. For each collection after the initial pre-qualification collection, if the used oil/antifreeze exhibits unusual characteristics (i.e. color, odor, etc.) it is considered to be from a high risk source.

Oil collected from a non-automotive category that exceeds 500 ppm silicon is considered "high silicon" oil. Non-automotive oil that exceeds 500 ppm silicon must complete the "high silicon" oil acceptance process and receive approval from the Oil Review Panel before being collected.

First, "high silicon" oil will only be collected if it can be shipped:

a. to an identified RFO end user; or,
b. directly to the end user; or,
c. directly to an SK facility that has been designated as a high silicon acceptance facility

Second, the amount of oil being collected must either be:

a. over 5,000 gallons for each individual generation event; or,
b. have a generation rate of at least 100,000 gallons annually

To complete the process follow the instructions below:

- Complete a profile
- Complete the **"High Silicon" Oil Acceptance Request Form**

- Submit the completed acceptance request form to the AREA MANAGER or in the case of terminals, the BULK FACILITY MANAGER for evaluation which consists of reviewing the following information:
    - Distance of oil customer to designated high silicon acceptance facility
    - Collection schedule (What months will the oil be collected?)
    - Pay for oil price per gallon
- After the Area Manager/Bulk Facility Manager approves or rejects the request he/she will notify the requesting location of the decision. If approved the request will be forwarded to the Oil Review Panel at OilReviewPanel@Safety-Kleen.com for consideration.
- After the Oil Review Panel has reviewed the request, the oil will be approved or rejected. If approved the oil will be directed to East Chicago refining or RFO by way of a written approval.
    - If accepted and approved, the approval will be valid for a length of time determined by the Oil Review Panel.
    - If rejected due to the volume requirements stated above, individual requests for smaller volume customers that exceed 500 ppm silicon may be made. The Oil Review Panel will re-evaluate its decision based on transportation costs, price of oil, ability to blend to less than 200 ppm silicon, etc.

High Risk Sources - Collection Procedure #3 (See definition above)

Oil/antifreeze from high risk sources may sometimes be contaminated with PCBs, Silicon, or other chemicals. The transportation and disposal of PCBs is very strictly regulated by the USEPA. **SK cannot transport PCBs in branch oil trucks.** PCBs cannot be detected in oil/antifreeze at the regulatory thresholds by the field tests used by Safety-Kleen.

A pre-qualification sample is required under this collection procedure. Pre-qualification results must be received prior to the initial collection only. PCB and Silicon results must be received prior to each following collection. The results are valid as long as the process that generates the used oil/antifreeze has not changed. If the generating process changes or if no oil/antifreeze is picked up for over one year, the pre-qualification approval becomes invalid and must be renewed before the oil/antifreeze is picked up again.

Oil collected from a high risk source that exceeds 200 ppm silicon is considered "high silicon" oil. Oil from high risk sources that exceed 200 ppm silicon must complete the "high silicon" oil acceptance process and receive approval from the Oil Review Panel before being collected. **The "high silicon" oil acceptance process for** high risk sources **is the same as the process described above under the non-automotive categories section.**

Segment Code Appeals Process

1. If the branch thinks the segment code is wrong they can request a change through Q2C (See **Segment Code Changer**).
2. If the branch is unsure of what the segment code should be they can use the **Segment Code Helper**.

If customer maintenance will not approve the segment code change request, please contact Director of Product Management Oil Products @ matthew.gudorf@safety-kleen.com.

Pre-Qualification & Pre-Shipment PCB and Silicon Sample Requirements

Before servicing any oil/antifreeze account, the sales specialist or OSSR must review the customer's operation and oil/antifreeze to determine the category - automotive, non-automotive, or a high risk source. Based on the criteria discussed in the Collection Procedures section of this BOG, they determine if a pre-qualification sample is needed. When a sample is necessary, a sales specialist will complete a material profile and take a pre-qualification sample following the sampling guidelines found in **BOG O310-008 Sampling Equipment and Technique**. The pre-qualification and pre-shipment evaluation and approval is performed by the Safety-Kleen Waste Approval Group.

The material profile should be completed using the online Dynamic Material Profile found in the **Waste Approval Wizard**. All pre-qualification samples must be sent to Safety-Kleen's laboratory at the East Chicago Oil Refinery. All pre-shipment PCB and Silicon samples must be sent to the Shreveport Oil Terminal (Analytical Laboratory). Due to availability and time constraints, an SK approved local lab may used for pre-shipment samples. Be aware that the cost for PCB and Silicon analyses from a local lab may be significantly higher than analysis at a Safety-Kleen lab. Additional analytical costs are the responsibility of the branch. Copies of the pre-qualification and pre-shipment approval and the material profile (with customer signature) must be filed in the customer file in the branch. If the analysis shows *any* PCBs you cannot service the account until you receive further guidance from your EHS Manager. All “high silicon” oil approvals must be processed through the Oil Review Panel.

At the time the pre-qualification sample is taken, for non-automotive and high risk customers, the service is entered into Q2C. Once a sample is approved a pending placement can be made. The physical sample is then packaged and sent to East Chicago for pre-qualification testing. Don’t forget to include a copy of the completed material profile along with the sample. The pre-qualification essentially is an evaluation for risk and process needs. If your customer needs to know what we test for, contact Technical Sales Support for assistance. The test methods for the SK pre-qualification are subject to change based on the regulatory, permit, and process needs.

Once the pre-qualification analysis is completed, the lab data is reviewed against the profile form and the generator knowledge to complete the approval. These two data points confirm customer knowledge for RCRA non-hazardous and TSCA non-regulated for waste management and shipment. Some oils may fail this evaluation and can still be shipped as exempt oil under 40 CFR 279. This should be clearly communicated to your customer before requesting it on the material profile. To supplement the pre-qualification data, customers may opt for supplying their own TCLP results or may work with the branch to have TCLP testing performed by a Safety-Kleen contracted laboratory.

Any waste exceeding TSCA limits will be excluded from the oil programs (re-refining and/or RFO). Oily wastes that exceed the RCRA limits for metals only are still eligible for SKOS as long as the waste is directed to a disposal outlet permitted to process 40 CFR Part 279 exempt used oil. If a sample fails for SKOS then comments will be added to the review, to document and explain what caused the waste to fail for acceptance into the program. The sales specialist who originally sampled the waste should contact the customer to notify them that the waste was not approved for SKOS. In addition, the sales specialist should inform the customer that the waste removal might be at a different process and/or cost then originally proposed.

Check with your EHS Manager if there are any permit requirements at your facility or at the receiving facility that generators must have their waste stream periodically analyzed regardless if the process has changed or not. A copy of the results must be placed in the customer's file at the branch and a copy given to the customer.

Always check the pre-qualification report in FocalPoint prior to servicing the customer as there may have been changes to the pre-qualification which could affect the pick-up.

Tips for completing the Material Profile:

1. In section G of the Material Profile, remember to write in the comment, "Review for SKOS" or "Review for SKVS".
2. Incorrectly completed paperwork will result in testing and/or waste review/approval delays.
3. Make sure the generator signs the completed material profile.

Listed below are some of the more commonly missed items on the material profile. Be sure to complete these correctly to prevent delays with the sample and/or the review for approval.

Section A:

- Check the correct EPA status box. If the generator is SQG or LQG make sure to list the EPA ID number. For states that require CESQG generators to obtain an EPA ID number, be sure to include it here as well.

Section B:

- List the container size, type, number, and frequency of shipments. The Review Group will apply a DOT shipping description when they review the waste stream for acceptance into the SKOS or SKVS programs.

Section C:

- List the name of the material.
- List the process generating the waste. Do not use vague process descriptions such "process waste", "waste", or other vague terms that do not help with verifying the other information on the profile.
- Check yes or no for every question in section C. If the "used oil exemption" is being applied, be sure to check yes and list 279 in the space to the right of the exemption question.
- A list of source and form codes can be obtained off the SK intranet site listed earlier to help complete that part of section C.

Section D:

- List all of the chemical constituents and their percentages. Do not use generic terms such as solvent, cleaner, etc. If listing product names be sure to attach the product MSDS to the profile and submit it with the sample.

Section E:

- Check yes or no for each of the items in this section.
- If the generator has metals information, complete that part of section E as well and mark where that information is coming from (e.g., TCLP testing, total metals testing, or generator knowledge of what went into the process and what they know comes out as waste). If the generator has outside analytical be sure to include this when sending the profile/sample.

Section F:

- Complete all parts of this section i.e. flash point, pH, viscosity (rough estimate is OK), and phase information in this section.
- If the generator knows the BTU, halogen level (if any), and specific gravity, complete that information as well.

Section G:

- List the comment “review for SKOS” or “Review for SKVS” in this section.
- List any other pertinent information or requests.

Section H:

- Have the generator sign and print their name in the correct location. Also make sure the document is dated.

A **PCB/Silicon Sample Record** form must be completed for each high risk source when PCB/Silicon samples are collected. This form and copies of all screening analyses must be placed in the customer files.

Sampling and Sample Management

Samples of used oil/antifreeze collected under this program are required for the pre-qualification evaluation and for quality control purposes. There are 4 types of samples that may be required.

Pre-Qualification Sample	Customer Retain Sample	Truck Retain Sample	Rebuttal Sample
A pre-qualification sample is required for oil/antifreeze from the non-automotive category and all high risk sources. This sample may be either a grab or a composite.	This quality control sample is taken from every oil/antifreeze customer at every pick up. The sample may be either a grab sample or a composite sample depending on the number of containers of oil/antifreeze on site. This sample is taken *before* the oil/antifreeze is loaded onto the truck.	This is a quality control grab sample taken from the tank of the oil truck at the end of the day and before unloading.	This is a sample that is sent to a laboratory for additional analysis. A rebuttal sample may be needed if the customer’s retain sample "fails" the tests performed in the field by the OSSR.

Grab and Composite Samples

! The single most important activity with regard to oil/antifreeze analysis is the practice of obtaining a representative sample. A sample that is not representative of the oil/antifreeze in **all** of the customer's containers will give false and misleading information. To be representative, samples must be collected from **each** tank, drum or container.

Grab samples are samples that are taken from a single container. If a customer has oil/antifreeze in a single container such as a tank, a grab sample will be representative of the oil/antifreeze. However, if the customer's oil/antifreeze is in more than one container, then a composite sample is necessary. For a composite sample to be representative, *each* container must be sampled. These individual samples are then combined into one composite sample.

Up to 10 separate samples may be mixed together to make a composite. If a customer has more than 10 containers, then more than one composite is required.

Number of Containers	Number of Composite Samples Required
≤ 10	1
11 - 20	2
21 - 30	3

Special Container and Tank Requirements for High Risk Sources

Because of the potential risk of contamination found in oil/antifreeze derived from high risk sources, special precautions are necessary to ensure that no oil/antifreeze is added to containers or tanks *after* a sales specialist obtains pre-qualification/pre-shipment samples.

After sampling, each container and tank closure will be marked (e.g. spray paint in a contrasting color). The intent is to be able to tell if the container has been opened. For containers, the markings should be made across the bungs and locking bolts. Be sure to get the marking on the threads of the bolts and bungs. For tanks, the markings should be over the locking cap or bolts on the closure device. Before pumping oil/antifreeze from the containers or tanks, the OSSR must carefully examine the marking applied when the sample was obtained.

! If there is any reason to believe that a container or tank at a high risk source has been opened after a pre-qualification/pre-shipment sample was taken, do not pump it.

Sampling Equipment

To get a representative sample, the proper sampling tool is necessary. The sampling tool used by Safety-Kleen for samples is a Composite Liquid Waste Sampler or COLIWASA. The COLIWASA consists of a plastic tube with an end stopper connected to an inner rod. The rod is used to close the tube while it is submerged in the oil or antifreeze. To get a representative sample, the stopper must be open while the COLIWASA is slowly lowered all the way to the bottom of the container. At the bottom, pull the rod up to close the end. Safety-Kleen uses 2 kinds of COLIWASAS. One is 4' long and is used for sampling drums and other small containers. The other is 6' long and is used for sampling tanks and the oil truck tank.

Glass jars are used for holding samples taken with the COLIWASA. There are 2 jar sizes. A 4-oz. jar is used for customer retain samples and a 16 oz. jar is used for truck retain samples. A 16 oz. jar or other clean container may also be used for compositing samples. After the composite has been created, place 4 oz. of it into the small jar.

When finished sampling at a customer's site, allow free flowing oil/antifreeze to drain from the COLIWASA tube and wipe the outside surface with a rag or sorbent pad. At the next customer's site, rinse the COLIWASA in the tank being tested *before* taking a sample. This will help to prevent possible cross contamination between samples.

Customer Retain Samples

A customer retain sample is required to be collected from every customer service. Customer retain samples may be either grab or composite. If the only source of oil/antifreeze at a customer's site is a single tank, then the customer retain will be a grab sample. If there is more than 1 container, then a sample must be taken from every container and combined to make a composite sample. Customer retain samples are taken *before* the oil or antifreeze is loaded onto the truck.

In some situations, it may be impossible to use the COLIWASA to take the customer retain sample. For example, some tanks are located in a basement where the ceiling is so low that the COLIWASA cannot be lowered into the tank. **In these situations a retain sample can be taken from the sampling port on the truck pump. This method may only be used if it is impossible to take a retain sample using a COLIWASA.**

To prevent cross contamination of the sample you are taking from the oil/antifreeze already in the pump and pipe line, it is very important to first bleed the oil truck's line to remove all remaining residue. After the pump and line are bled dry, pump just enough oil/antifreeze from the generator's storage tank to fill the pump and line with oil/antifreeze. Do not pump so much oil/antifreeze that the tank begins to fill. A retain sample may then be taken from the sampling port on the pump.

Truck Retain Samples

A representative truck retain sample must be taken from every truck before the oil/antifreeze is unloaded. Truck retains are grab samples. To get a representative sample, the long coliwasa must be used. **If the truck has more than 1 compartment, a separate truck retain must be taken from each compartment.** The sample collected can be mixed together.

Sampling Precautions

Persons taking pre-qualification samples must first complete the course **ET_143 Sampling Hazardous Materials and Wastes**. This course is not required for persons collecting customer or truck retain samples. However, all samplers must be aware of situations that could indicate unusual hazards. These situations include:

Wobbling Drums	If the ends of the drum are bulged and cause the drum to wobble, this could indicate a build-up of internal pressure. Do not open the drum.
Hot Drums	A drum that is warm or hot to the touch could mean that a reaction is occurring. Do not open the drum.
Plastic Drums	Often, plastic drums are used to store corrosive liquids. If oil or antifreeze is in a plastic drum, find out from the customer what was stored in the drum before the oil/antifreeze. If it was a corrosive material, do not open the drum.
Strong Odors	Strong odors indicate contamination. If you open a container or tank and notice a strong odor, do not sample. If there is a rotten egg smell this could indicate hydrogen sulfide contamination. Hydrogen sulfide is poisonous in very low concentrations. Close the containers and do not sample.

If any container or tank is unable to be sampled for any reason, it may not be pumped onto the truck.

Sample Management

All sample jars must be properly labeled for identification. The labeling requirements are different for customer retains and truck retains. For example, the customer retain sample label requires the signature of the customer, while both labels require the signature of the OSSR performing the service. Everything is required to be filled out on both labels. The customer retain labels can be pre-printed and are mailed to the branch from the printing company with the pre-print service documents every week.

After the sample is taken and the label is filled out, it must be attached to the sample jar. The label is placed so that it contacts both the jar lid and the side of the jar so that it acts as a seal to prevent tampering with the sample.

At the end of the day, all samples are removed from the truck and are stored in a secure location in the branch. All retain samples must be stored for a minimum of 90 days. They should be organized in the storage location by date so that they may be easily retrieved. After 90 days (but prior to 120 days), samples may be discarded. See **Branch SOP 20-21-203-01 Retain Samples** for additional information on sample storage.

To easily keep track of the 90 day storage limit, follow the steps outlined below.

a. Designate an area in the branch with four shelves and label the individual shelves as follows:

   1st. January/May/September
   2nd. February/June/October
   3rd. March/July/November
   4th. April/August/December

b. Further divide the shelving such that each OSSR has a designated set of 4 shelves each.

c. Label the end of each box of customer retains with the service rep's name, and start and end dates (month/day/year) of the retain samples inside the box.

d. Place each full box of samples on the shelf labeled with the month corresponding to the **end date** month (i.e. if the date on the samples starts in January and ends in February - place the completed box on the February shelf). Face out the labeled end of the box for easy access.

e. Truck Retain Samples are placed on the shelf labeled with the month corresponding to the date on the truck retain label.

When all the shelves are full, and the 5th month begins, then the 1st month samples can be drummed and prepared for shipment (for example: when May begins, 90 days have passed for ALL the January samples. All the January samples can then be removed. Likewise, when May is finished, the February samples can be removed to make room for June and so on).

If retain samples are sent to an RC for fuel blending, they must be shipped as RCRA hazardous waste using the following description:

NA1993 WASTE COMBUSTIBLE LIQUID N.O.S.
(OIL)PGIII
(USED OIL RETAIN SAMPLES)

(ERG# 128)(D001, D007, D008, D018, D039)

A U.S. manifest is required (profile #403901225/SK DOT #7001249).

Field Testing

OSSRs must test oil in the field before it is loaded onto the truck. Antifreeze comingled with oil must also be tested in the field. This testing is designed to detect the presence of chlorinated solvents in the oil and is required by Federal and State regulations. EPA prohibits small quantity generators (SQGs) and large quantity generators (LQGs) from mixing chlorinated solvents with used oil. Since EPA allows conditionally exempt small quantity generators (CESQGs) to mix chlorinated solvents with used oil, it is not necessary to test oil from CESQGs. Only used oil from SQGs and LQGs will be field tested. You must indicate the generator status (CESQG, SQG, or LQG) of the customer on the service order or the SAM receipt by checking the appropriate box.

NOTE: The exemption from field testing for CESQGs does not apply to high risk sources; 100% of all high risk sources require field testing, as well as, PCB and Silicon testing for each oil collection service regardless of their generator status.

Even though EPA allows CESQGs to mix solvents with used oil, not all states allow this. If you are located in such a state then all oil will need to be tested before it is pumped onto the truck. Check with your EHS Manager to find out if your state does not allow this mixing by CESQGs. There are 2 types of tests that are used in the field. These are the TIF Halogen Leak Detector test and the Dexsil Clor-D-Tect test. The TIF is an electronic instrument that detects solvent vapors in the air above an oil/antifreeze sample. The Clor-D-Tect is a test kit that measures the amount of chlorine only in used oil. Clor-D-Tect kits have an expiration date stamped on the box. Do not use the kit if it is past the expiration date. Follow the **Dexsil Deactivation and Disposal Procedure** when you have expired kits. Some states do not allow the use of the TIF Halogen Detector. Check with your EHS Manager.

The TIF is used first to test oil/antifreeze. If the oil/antifreeze "passes" the TIF test, then it may be pumped without further testing. If the oil "fails" the TIF test, then a Clor-D-Tect test is performed on the same sample. Do not conduct a Clor-D-Tect test on antifreeze. If the oil "passes" the Clor-D-Tect test, it may be pumped. If the oil "fails" the Clor-D-Tect test, do not pump the oil onto the truck. The results of the field testing, either pass or fail must be entered onto the service documents or the SAM receipt.

It is best to perform the TIF and the Clor-D-Tect tests on the customer retain sample. However, the tests may also be performed on individual containers. If individual containers are tested instead of the customer retain sample; every container that is to be pumped must be tested.

If the oil does not pass these tests, Safety-Kleen can still perform laboratory analysis on the customer retain sample to confirm or deny the presence of chlorinated solvents. This is called the "rebuttal analysis". If the oil "passes" the rebuttal analysis, the oil can be pumped without further testing.

To get a rebuttal analysis, send the labeled 4 oz. sample to the East Chicago Oil Refinery. A material profile must be completed. Be sure to note on the profile that it is for an oil rebuttal.

TIF Testing

There are 2 different types of TIF meter used by Safety-Kleen, but both work the same way. These are the model 5650A and the model RX-1A.

The TIF responds to vapors in the air. Oil or antifreeze samples will be tested by using the TIF to check for vapors in the headspace of the sample as an indication of whether there are solvents in the oil or antifreeze. If the customer's oil/antifreeze containers are closed and have not been recently disturbed, the headspace of the container may be tested. If the container is not closed or if it is windy or if the temperature of the oil/antifreeze is not above 50° F, then the headspace of the retain sample must be tested. Fill a 4 oz jar half way with a portion of the retain sample. If the temperature is below 50, allow the sample to warm before testing. Cap the sample jar and shake the sample. Allow it to settle, remove the cap, and immediately insert the sensor of the TIF into the headspace of the jar. The tip of the sensor should be held ¼ inch from the surface of the oil/antifreeze. Do not allow the tip of the sensor to contact the oil/antifreeze. If this occurs, the test is invalid and the sensor tip must be immediately replaced. The audible beep rate and the lights on the TIF will increase as the TIF detects vapors. The TIF test indicates a failure of the sample if 3 or more LEDs light up on the model 5650A or if 6 or more LEDs light up on the model RX-1A.

Before use, the TIF must be checked to verify that it is operating properly. This check must be performed at each customer's site. To check it, follow these steps:

1. Turn the unit on in the cab of the truck or in an outside area away from the customer's oil/antifreeze.
2. Allow the unit to stabilize (zero) for five or six beeps.
3. Test the TIF meter for proper operation by inserting the TIF probe into the headspace of a jar containing unused Safety-Kleen Clear Choice Cleaning Solvent*. A positive response (3 or more lights for the Model 5650A or 6 or more lights for the RX-1A) indicates that the detector is working properly. A negative response indicates that the TIF unit is not working properly and cannot be used.

*OSSRs must carry a 4 oz. jar of Clear Choice Cleaning Solvent with them for testing the operation of the TIF.

Go to the laboratory SOP labeled **Halogen Screen using TIF Halogen Detectors** for more information and instructions on using the TIF.

Clor-D-Tect Tests

The Clor-D-Tect test is used whenever the TIF indicates a positive response (the oil "fails"). Full instructions are provided with each test kit, but a small oil sample is placed into a test tube and various chemical are added. A purple color of the test solution indicates that chlorine (found in solvents) is not present. If the test solution is pale yellow in color, that means the oil has more than 1,000 ppm chlorine and has "failed" and may not be pumped. Note that this test cannot be used on oil that contains more than 20% water. Water in the oil sample will invalidate the results from this test. If your sample has an oil layer floating on water, be sure to test only the oil portion. If a sample fails the TIF test and it contains enough water so the Clor-D-Tect cannot be performed, the oil may not be pumped.

Clor-D-Tect kits have an expiration date stamped on the box. Do not use the kit if it is past the expiration date. Follow the **Dexsil Deactivation and Disposal Procedure** when you have expired kits.

Shipping Papers and Service Documents

OSSRs must complete shipping and service documents in the field. Most states do not regulate used oil or antifreeze as hazardous waste so a hazardous waste manifest is not needed to transport used oil or antifreeze. A service document, SAM receipt, or a Bill of Lading is an acceptable shipping document.

However, there are some states that do (such as MA). For these states, a hazardous waste manifest and LDR form are necessary. Check with your EHS Manager to determine if your state regulates used oil or antifreeze as hazardous waste.

Personal Protective Equipment (PPE)

Consult the most recent **Branch Personal Protective Equipment Requirements (Workplace Hazard Assessment) Matrix** for the PPE requirements for collecting used oil/antifreeze and performing pre-qualification sampling.

Servicing the Customer

Customer Bulk Transfer Loading Checklist
The driver understands that where feasible he/she must maintain constant visual contact with all hoses, hose connections, valves, and tank volume. The driver shall not sit inside the cab of the truck during the loading/unloading process, and must remain alert, in the immediate vicinity (within 25 feet of the truck), and in full view of the truck tank. If the driver cannot follow the above, he/she should adhere to the following best management practices: a. ensure the oil is being pumped into the proper compartment **and** b. ensure • the amount of oil being pumped is less than the remaining capacity in the truck tank **or** • that he/she is either at the truck or has a second trained person at the truck to prevent overfilling the tank by shutting down the pumping operations if necessary. If a trained person is not available, then the second person must be in verbal contact with the driver and advised to call him in time to stop the pumping to prevent a truck tank overfill.
All hoses have been thoroughly inspected for signs of wear, deterioration. Any hoses in unsatisfactory condition have been removed from service.
All hose connectors (cam-locks) and tank fittings are undamaged and are tight fitting.
All cam-lock hose and tank fittings require securing devices (such as Velcro straps, bungee cords, or plastic zip ties) to be used during the loading process.
Spare gaskets and hoses are readily available, if needed.
Properly fitting gaskets are present in each hose fitting, free from pits, cracks, debris or other defects.

A “Before” truck tank gauge reading must be taken and recorded on the Oil Reconciliation form. Drivers must account for volume limitations due to uneven terrain (i.e. a truck parked on unlevel parking lot may have diminished capacity).
An “After” truck tank gauge reading must be taken and recorded on the Oil Reconciliation From.
After loading: End caps have been secured on all hoses. Dome lid is closed and secured.
After loading: All valves are completely closed, with end caps secured.

BGMs must ensure that all cargo tank drivers secure cam-lock fittings as specified in the training course **ET_170 Cargo Tank Operations** and **O350-005 Requirements for Common Carriers and Offsite SK Drivers**. Cam-lock hose and tank fittings must also be undamaged and tight fitting.

Here is the ordering information for the devices used to secure the “ears” on cam-lock hose fittings. They are ordered from MSC (SK has a national account with them). They are called Hook and Loop Cinch Straps.

MSC part #	Description	Price
78180726	For maximum 3” diameter hose, 10/pack	$12.06/pack
78180734	For maximum 5” diameter hose, 10/pack	$15.07/pack

BOG Variances

2011 Variances

ATTACHMENT D

SLUDGE, RESIDUE, AND BY-PRODUCT MANAGEMENT DESCRIPTION

GENERATED WASTES

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

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

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

HAZARDOUS WASTE WEEKLY INSPECTION RECORD

SAFETY KLEEN SYSTEMS WEEKLY INSPECTION FORM

Authorized Inspectors:
[Legibly print full name below, First Name, Middle Initial & Last name]
_____
_____

Site Location: OCALA FILTER DRUM WAREHOUSE

Inspection Date:					
Inspection Time:					
Inspector's Initials:					
Site Status:					

INSPECTION ELEMENTS:

1. Check all drums for leaks, corrosion, bulging, etc.					
2. Ensure all drums are closed and stored in secondary containment.					
3. Make sure there is aisle space between rows of drums.					
4. Ensure ground straps available and unsealed containers of ignitables are grounded.					
5. Ensure all drums are marked and labeled.					
6. Check containment condition; clean, dry drain secure.					
7. Ensure facility secured against unauthorized entry.					
8. Make sure personal protective equipment is available.					
9. Check condition of loading/unloading area					
10. Check site perimeter: vegetation trimmed and no signs of leakage (dead vegetation or discolored soil).					
11. Check for spill control supplies					
12. Make sure fire extinguishers are full and sealed.					
13. Check operation of emergency equipment (phone, alarm, water supply)					
14. Make sure drums and containers of waste are in designated areas.					
15. Make sure Contingency Plan emergency phone numbers are posted.					
16. Number of Hazardous Waste Containers Present					

REMARKS (Date corrective action taken, sump drainage, and other observations):

NOTE: Inspections must be conducted at least every 7 days. Facility must maintain a record of each inspection for 3 years

*–Note
A–Adequate
N–Not Adequate

NONHAZARDOUS WASTE WEEKLY INSPECTION RECORD

SAFETY KLEEN SYSTEMS WEEKLY INSPECTION FORM

Authorized Inspectors:
[Legibly print full name below, First Name, Middle Initial & Last name]
_____

_____

Site Location:	OCALA FILTER DRUM WAREHOUSE					
Inspection Date:						
Inspection Time:						
Inspector's Initials:						
Site Status:						

INSPECTION ELEMENTS:

1. Check all drums for leaks, corrosion, bulging, etc.						
2. Ensure all drums are closed and stored in secondary containment.						
3. Make sure there is aisle space between rows of drums.						
4. Ensure ground straps available and unsealed containers of ignitables are grounded.						
5. Ensure all drums are marked and labeled.						
6. Check containment condition; clean, dry drain secure.						
7. Ensure facility secured against unauthorized entry.						
8. Make sure personal protective equipment is available.						
9. Check condition of loading/unloading area						
10. Check site perimeter: vegetation trimmed and no signs of leakage (dead vegetation or discolored soil).						
11. Check for spill control supplies						
12. Make sure fire extinguishers are full and sealed.						
13. Check operation of emergency equipment (phone, alarm, water supply)						
14. Make sure drums and containers of waste are in designated areas.						
15. Make sure Contingency Plan emergency phone numbers are posted.						
16. Number of Hazardous Waste Containers Present						

REMARKS (Date corrective action taken, sump drainage, and other observations):

NOTE: Inspections must be conducted at least every 7 days. Facility must maintain a record of each inspection for 3 years

ENVIRONEERING, INC. Table Created On 4/3/00

359 Cypress Road Silver Springs Shores
Ocala, FL 34472

ENCLOSURE (4)

*–Note
A–Adequate
N–Not Adequate

ATTACHMENT E

FACILITY USED OIL TRACKING PLAN

FACILITY USED OIL TRACKING PLAN

INTRODUCTION

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

DESCRIPTION

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

The tank that each tanker load is placed into is recorded on the S-K Incoming Used Oil Shipment Log. Loads that are to be rejected will be done so prior to offloading the used oil. The S-K used oil processing facility will keep a record of each incoming used oil shipment accepted for processing. (A copy of the Waste Profile form is provided.) The main record form will be the S-K Incoming Used Oil Shipment Log. This log contains the following information:

- Name and address of the transporter who delivered the used oil shipment;
- Name and address of the generator or processor/re-refiner from whom the used oil was sent for processing;
- The EPA identification number of the transporter who delivered the used oil;
- The EPA identification number of the generator from whom the used oil was sent;
- The quantity of used oil accepted and the date of acceptance;
- Waste Stream approval number and off load tank number; and
- Pre-acceptance profile number.

The S-K used oil processing facility maintains a record of each outgoing used oil shipment that is sent to a used oil burner, processor/re-refiner or disposal facility. The record will be the S-K Outgoing Used Oil Shipment Log. The processed fuel will be placed into a tank until it is full or the production run is finished. Upon sampling the contents of the tank, no further used oil will be added to the tank. The processed fuel tank will be sampled and analyzed in accordance with the waste analysis plan. The analytical results are assigned a number by the laboratory. The Laboratory Analytical Number will be recorded on the shipping document and on the S-K Outgoing Used Oil Shipment Log. A copy of a typical shipping document is provided in Attachment E-1. No additional used oil will be added to the process fuel tank while the Laboratory Analytical Number is being used for outgoing shipments. This log contains the following information:

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

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

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

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

OPERATING REPORTS

S-K will complete and forward a report of activities for the previous year to the regional administrator on a biennial basis, by March 1st of every even-numbered year. The report will include the EPA Identification Number, name and address of the processor, the calendar year covered by the report, and the quantities of used oil accepted for processing and the manner in which the used oil was processed, including the specific process employed.

ATTACHMENT E-1

USED OIL TRACKING FORMS

OIL SERVICES / WASTE TRACKING

safety-kleen

DOCUMENT NO.
654600

SHIPPER

PHONE NUMBER	US EPA ID NO.	CUSTOMER NUMBER	MANIFEST NUMBER
	STATE EPA ID NO.		

	TRANSPORTER COMPANY NAME	ADDRESS	US EPA ID NUMBER
1			
2			
3			

DESIGNATED HANDLER

US EPA ID NUMBER	
STATE EPA ID NUMBER	
PHONE NUMBER	

HM	US DOT DESCRIPTION	IN EVENT OF EMERGENCY CALL 1-800-468-1760 (24 hours)	CONTAINER NO.	CONTAINER TYPE	TOTAL QUANTITY	UNIT WT/VOL	SK DOT NUMBER

INITIAL APPROPRIATE BOX

OIL SERVICES CERTIFICATION NO. 1

CERTIFICATE OF USED OIL/ANTIFREEZE CLASSIFICATION
FOR SHIPMENT FROM A BRANCH TO A PROCESSING FACILITY

I certify that to the best of my knowledge, the used oil contained in this shipment does not contain regulated hazardous waste as defined in 40 CFR 261, and does not require the use of a hazardous waste manifest except in the following states as required by state law: Illinois, Missouri, Michigan, South Carolina, Massachusetts, and New Jersey. The oil has been collected and tested in compliance with 40 CFR 266 and applicable state laws using either:

1) Analytical data regarding the generator's used oil stream, or
2) Knowledge of the generator's process.

In addition, the collection drivers obtained certification from every generator that 40 CFR 261 Part D listed hazardous wastes have not been mixed with the used oil. Documentation supporting the above statements may be found in the files of the shipping facility identified above.

SHIPPER'S INITIALS

OIL SERVICES CERTIFICATION NO. 2

CERTIFICATE OF USED OIL/ANTIFREEZE CLASSIFICATION
FOR SHIPMENT FROM AN INTERMEDIATE STORAGE FACILITY
TO A PROCESSING FACILITY

I certify that all used oil contained in this shipment has been received at this site accompanied by a Certificate of Used Oil Classification from the collection branch/depot. That certificate ensure that all material was collected in compliance with 40 CFR 266 and the used oil does not contain hazardous waste. Documentation supporting these statements are available at the shipping facilities.

SHIPPER'S INITIALS

INTERMODAL CERTIFICATION — GROSS CARGO WEIGHT _____ CONTENTS PLUS PACKAGING

SHIPPER'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national government regulations.

SHIPPER NAME	SIGNATURE X	SHIPMENT DATE ▷	MONTH DAY YEAR	TRUCK/ RAIL CAR ID NO
TRANSPORTER NAME 1	SIGNATURE X	DATE OF RECEIPT	MONTH DAY YEAR	
TRANSPORTER NAME 2	SIGNATURE X		MONTH DAY YEAR	
TRANSPORTER NAME 3	SIGNATURE X		MONTH DAY YEAR	
RECEIVING FACILITY	SIGNATURE X		MONTH DAY YEAR	

PART NO. 1380 (REV 10/96)

SHIPPER

safety-kleen

5360 Legacy Drive, Building 2, Suite 100 800-669-5740
Plano, Texas 75024 www.safety-kleen.com
CUSTOMER NO.

DUNS NO. 05-397-6551 FED. ID NO. 396090019

ELGIN OFFICE

FOR SERVICE CALL	BRANCH MANAGER	DOC. EXP.	SCHEDULED SERVICE WEEK	SCHEDULED TERRITORY	REFERENCE NUMBER

CREDIT CODE	PREVIOUS BALANCE	BAL. OVER 60 DAYS

CUSTOMER SEGMENT	CHAIN	OUTER COUNTY	SVC. P/C	PROD. P/C

LOCATION	TAX EXEMPTION NUMBER

CUSTOMER GENERATOR

BILL TO

SERVICE DATE	SALES REP NO.	CUSTOMER P.O. NUMBER	CUSTOMER PHONE #	TAX CODE	DATE EQPT/PROD ORDERED	SERVICE TAX	C.O.M.S. TAX	PRODUCT TAX

	DEPT	SERVICE/ PRODUCT	SURVEY NUMBER	UNIT PRICE	QUANTITY	CHARGE	SALES TAX	TOTAL CHARGE	CHLORINE TEST RESULTS: HALOGEN TESTER PASS	HALOGEN TESTER FAIL	CHLOR-D-TECT RESULTS (PPM)	CHLOR-D-TECT TESTERS INITIALS	SK DOT NUMBER	CC	SERVICE TERM	CHANGE SERVICE TERM (WEEKS)	CHANGE SERVICE TERM (INITIAL)	CHANGE SCH. DATE (YY WW)	PROMO NO.	RELEASE NO.
1									☐	☐										
2									☐	☐										
3									☐	☐										
4									☐	☐										
5									☐	☐										
6									☐	☐										
7									☐	☐										
8									☐	☐										
9									☐	☐										

TOTAL-SERVICE/PRODUCTS

TANK CAPACITY

TRANSPORTER DATE / /

PRINT NAME

X SIGNATURE

FACILITY DATE / /

PRINT NAME

X SIGNATURE

GENERATOR STATUS: CHECK ONLY ONE BOX BELOW

GENERATOR: HAZARDOUS WASTE CLASSIFICATION *	VEHICLE FLUIDS ONLY	OTHER NON-VEHICLE FLUIDS
CESQG	☐ 1	☐ 3
SQG/LQG	☐ 2	☐ 4

1 NO PREQUAL REQUIRED, NO HALOGEN TEST
2 NO PREQUAL REQUIRED, HALOGEN TEST AT PICK-UP
3 PREQUAL REQUIRED, NO HALOGEN TEST
4 PREQUAL REQUIRED, HALOGEN TEST AT PICK-UP
* REFER TO REVERSE SIDE FOR DEFINITIONS

MANIFEST NO.	USEPA TRANSPORTER ID NO.
GENERATOR USEPA ID NO.	GENERATOR STATE ID NO.

11. US DOT DESCRIPTION (INCLUDING PROPER SHIPPING NAME, HAZARD CLASS, AND ID.)	12. CONTAINERS NO.	12. CONTAINERS TYPE	13. TOTAL QUANTITY	14. UNIT WT/VOL	SK DOT NUMBER
A.					
B.					
C.					
D.					

INTERMEDIATE FACILITY NAME AND ADDRESS

USA EPA ID NO.

STATE ID NO.

OIL RECOVERY SERVICE/ SALES ACKNOWLEDGMENT

PAYMENT RECEIVED SECTION

CASH ☐ TOTAL RECEIVED APPLY PAYMENT TO:

CHECK NUMBER

☐ TODAY'S SERVICE/SALE
☐ PREVIOUS BALANCE AS FOLLOWS

INVOICE #	AMOUNT $	INVOICE #	AMOUNT $

PREVIOUS CREDIT CARD NO →

CREDIT CARD NO. AMEX VISA MC EXP. DATE

CUSTOMER REFERENCE INFORMATION

MANIFEST CODE	SEQ #

IN THE EVENT OF AN EMERGENCY CALL
1-800-468-1760 (24 hours)

CHARGE MY ACCOUNT FOR THIS TRANSACTION UNLESS OTHERWISE INDICATED IN THE PAYMENT RECEIVED SECTION.

Customer certifies that the above-named materials are properly classified, described, packaged, marked and labeled, and are in proper condition for transportation according to the applicable regulations of the U.S. Environmental Protection Agency and the U.S. Department of Transportation.

ADDITIONAL TERMS AND CONDITIONS ON THE REVERSE SIDE OF THIS DOCUMENT ARE INCORPORATED HEREWITH MADE A PART HEREOF.

Print Name

X GENERATOR/SHIPPER DESIGNATED REPRESENTATIVE SIGNATURE

TOTAL DUE

DO NOT WRITE IN THE AREA BELOW

SEE REVERSE SIDE FOR IMPORTANT INFORMATION

PART NO. 1353 (01/10)

ATTACHMENT F

FACILITY PREPAREDNESS AND PRESENTATION PLAN

ENVIRONMENTAL CONSULTING & TECHNOLOGY, INC.

SPILL PREVENTION, CONTROL, AND COUNTERMEASURE PLAN

SAFETY-KLEEN SYSTEMS, INC.
359 CYPRESS ROAD
OCALA, FLORIDA

Prepared for:

SAFETY-KLEEN SYSTEMS, INC.

PLANO, TEXAS

Prepared by:

Environmental Consulting & Technology, Inc.

8651 Commodity Circle
Orlando, FL 32819

ECT NO. 090211-1111

October 2011

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1.0 CERTIFICATIONS AND MANAGEMENT APPROVAL

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

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

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

By:_____
Mario E. Farrulla, P.E.
Florida P.E. No. 55168

Date: 10/18/11

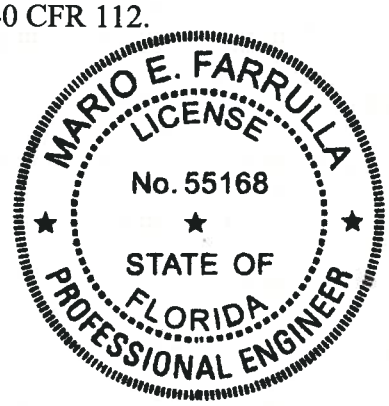

Table 1-1 provides a detailed listing of the professional engineer certifications for this SPCC Plan.

Table 1-1. SPCC Plan Certifications

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

1.2 DOCUMENTATION OF PLAN REVIEW AND EVALUATION (112.5)

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

1.3 MANAGEMENT APPROVAL (112.7)

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

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

Date:_____

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

THE SUBSTANTIAL HARM CRITERIA

1. Does the facility transfer oil over water to or from vessels and does the facility have a total oil storage capacity greater than or equal to 42,000-gallons? ☐ Yes ☒ No

2. Does the facility have a total oil storage capacity greater than or equal to 1 million gallons and does the facility lack secondary containment that is sufficiently large to contain the capacity of the largest aboveground oil storage tank plus sufficient freeboard to allow for precipitation within any aboveground oil storage tank area? ☐ Yes ☒ No

3. Does the facility have a total oil storage capacity greater than or equal to 1 million gallons and is the facility located at a distance (as calculated using the appropriate formula in Attachment C-III to Appendix C to 40 CFR 112 or a comparable formula1) such that a discharge from the facility could cause injury to fish and wildlife and sensitive environments? For further description of fish and wildlife and sensitive environments, see Appendices I, II, and III to DOC/NOAA's "Guidance for Facility and Vessel Response Plans: Fish and Wildlife and Sensitive Environments" (see Appendix E to 40 CFR 112, Section 13, for availability and the applicable Area Contingency Plan. ☐ Yes ☒ No

4. Does the facility have a total oil storage capacity greater than or equal to 1 million gallons and is the facility located at a distance (as calculated using the appropriate formula in Attachment C-III to Appendix C to 40 CFR 112 or a comparable formula) such that a discharge from the facility would shut down a public drinking water intake? ☐ Yes ☒ No

5. Does the facility have a total oil storage capacity greater than or equal to 1 million gallons and has the facility experienced a reportable oil discharge in an amount greater than or equal to 10,000-gallons within the last 5 years? ☐ Yes ☒ No

Certification

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

By:_____ Date:_____

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

2.0 INTRODUCTION

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

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

2.1 PLAN REVIEW AND AMENDMENT (112.5)

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

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

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

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

2.1.2 PERIODIC REVIEW AND EVALUATION (112.5[b])

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

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

2.2 GENERAL PLAN REQUIREMENTS (112.7)

2.2.1 SPCC PLAN PREPARATION

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

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

2.2.2 MANAGEMENT APPROVAL

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

2.2.3 PLAN SEQUENCE

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

2.2.4 FUTURE IMPLEMENTATION

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

2.3 CONFORMANCE WITH PLAN REQUIREMENTS (112.7[a][1], 112.8[a])

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

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

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

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

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

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

Source: ECT, 2011.

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

3.0 FACILITY INFORMATION

3.1 DETAILED SUMMARY

Facility Owner:	Safety-Kleen Systems, Inc. 5360 Legacy Drive, Building 2, Suite 100 Plano, Texas 75024 Telephone: (972) 265-2000
Facility Operator:	Safety-Kleen Systems, Inc. 359 Cypress Road Ocala, Florida 34472 Telephone: (352) 687-0688 Fax: (352) 687-8511
Latitude/Longitude:	29° 04' 55.28" North 81° 59' 27.19" West
Facility Street Address:	359 Cypress Road Ocala, Florida 34472
Facility Phone/Fax:	Telephone: (352) 687-0688 Fax: (352) 687-8511
Depot Manager:	Mr. Darwin "Troy" Robinson

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

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

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

FIGURE 1.
SITE LOCATION MAP
ATLANTIC SAFETY-KLEEN
359 CYPRESS RD., OCALA, FL.

Sources: USGS Topo: Belleview, FL., 1991; ECT, 2009.

ECT
Environmental Consulting & Technology, Inc.

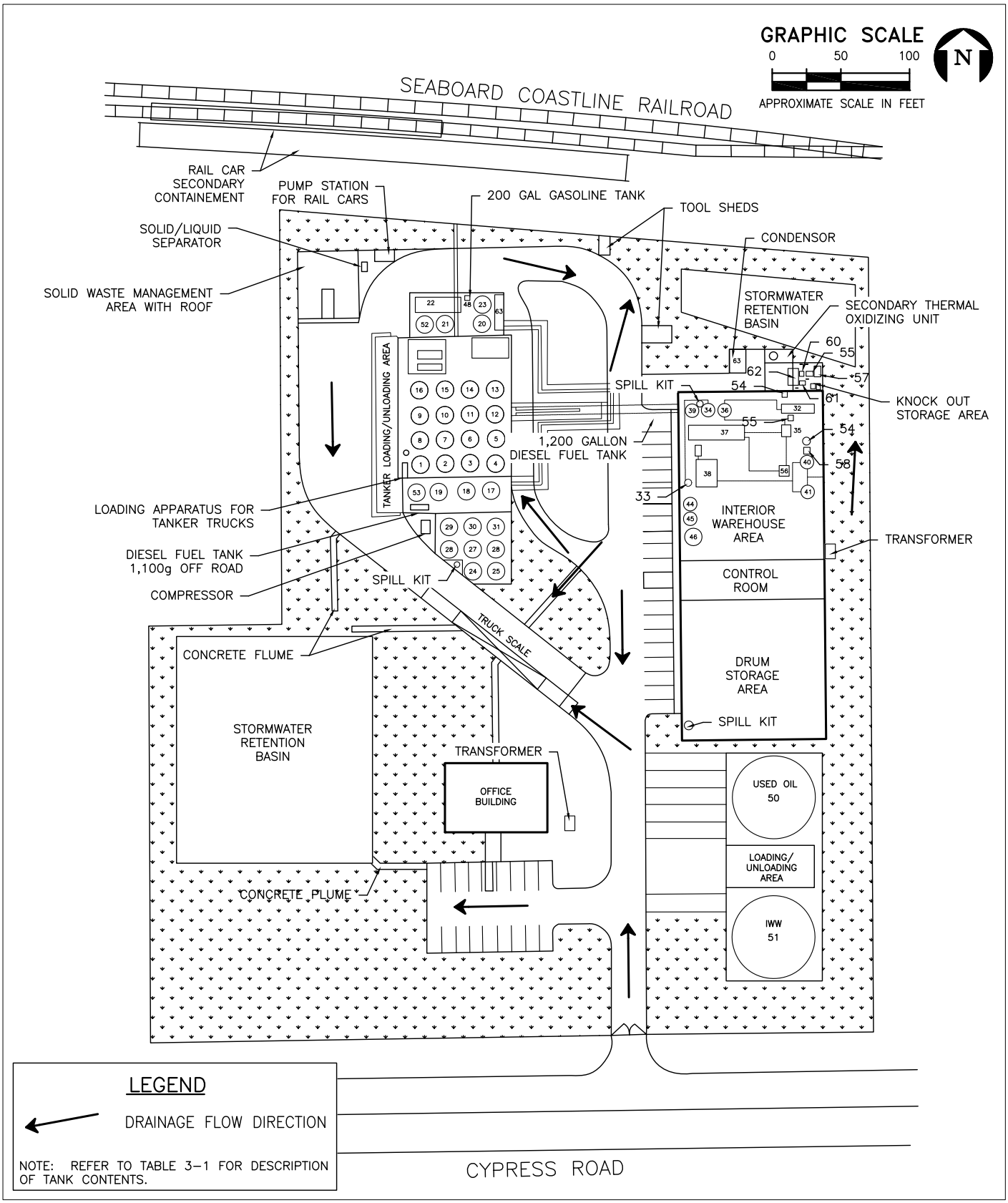

FIGURE 2.

SITE PLAN

SAFETY-KLEEN

Source: ECT, 2009.

ECT

Environmental Consulting & Technology, Inc.

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

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

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

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

40 CFR 112.2 defines "oil" as:

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

"Bulk storage container" is defined as:

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

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

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

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

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

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

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

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

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

Table 3-1. Oil Storage

Bulk Storage Container (Type of Tank)	Tank Number	Container Volume (gallons)	Contents (Type of Oil)	Location Onsite
Aboveground tank	1	30,000	Used oil	Main tank farm containment area
Aboveground tank	2	30,000	Used oil	Main tank farm containment area
Aboveground tank	3	30,000	Used oil	Main tank farm containment area
Aboveground tank	4	30,000	Used oil	Main tank farm containment area
Aboveground tank	5	30,000	Used oil	Main tank farm containment area
Aboveground tank	6	30,000	Used oil	Main tank farm containment area
Aboveground tank	7	30,000	Used oil	Main tank farm containment area
Aboveground tank	8	30,000	Used oil	Main tank farm containment area
Aboveground tank	9	30,000	Used oil	Main tank farm containment area
Aboveground tank	10	30,000	Used oil	Main tank farm containment area
Aboveground tank	11	30,000	Used oil	Main tank farm containment area
Aboveground tank	12	30,000	Used oil	Main tank farm containment area
Aboveground tank	13	30,000	Used oil	Main tank farm containment area
Aboveground tank	14	30,000	Used oil	Main tank farm containment area
Aboveground tank	15	30,000	Used oil	Main tank farm containment area
Aboveground tank	16	30,000	Used oil	Main tank farm containment area
Aboveground tank	17	20,000	Industrial wastewater	Central tank farm containment area
Aboveground tank	18	20,000	Industrial wastewater	Central tank farm containment area
Aboveground tank	19	20,000	Industrial wastewater	Central tank farm containment area
Aboveground tank	20	20,000	Industrial wastewater	North tank farm containment
Aboveground tank	21	20,000	Industrial wastewater	North tank farm containment
Aboveground tank	23	20,000	Industrial wastewater	North tank farm containment
Aboveground tank	24	30,000	Used oil	South tank farm containment area
Aboveground tank	25	30,000	Used oil	South tank farm containment area
Aboveground tank	26	30,000	Used oil	South tank farm containment area
Aboveground tank	27	30,000	Used oil	South tank farm containment area
Aboveground tank	28	30,000	Used oil	South tank farm containment area
Aboveground tank	29	30,000	Used oil	South tank farm containment area
Aboveground tank	30	30,000	Used oil	South tank farm containment area
Aboveground tank	31	30,000	Used oil	South tank farm containment area
Hot Gas Generator	32	20,468	Hot gas generator	Warehouse building
Aboveground tank	33	5,260	Used oil	Warehouse building
Aboveground tank	34	6,000	Recovered process water	Warehouse building
Aboveground tank	35	1,000	Oil	Warehouse building
Aboveground tank	36	6,000	Low flash recovery	Warehouse building
Aboveground tank	37	1,000	Used oil	Warehouse building
Aboveground tank	38	5,027	Condensate	Warehouse building
Aboveground tank	39	6,000	Low flash recovery	Warehouse building
Aboveground tank	40	6,000	Fuel oil/mineral oil	Warehouse building
Aboveground tank	41	6,000	Low flash recovery	Warehouse building
Aboveground tank	44	2,700	Fuel oil	Warehouse building
Aboveground tank	45	2,700	Fuel oil	Warehouse building
Aboveground tank	46	13,000	Fuel oil	Warehouse building
Aboveground tank	49	1,100	Diesel	Central tank farm containment area
Aboveground tank	50	159,000	Used oil	Southeast containment area

Table 3-1. Oil Storage (Continued, Page 2 of 2)

Bulk Storage Container (Type of Tank)	Tank Number	Container Volume (gallons)	Contents (Type of Oil)	Location Onsite
Aboveground tank	51	159,000	Industrial water	Southeast containment area
Aboveground tank	54	150	Oily water	Warehouse building
Aboveground tank	55	150	Oily water	Warehouse building
Aboveground tank	56	200	Used oil	Warehouse building
Aboveground tank	57	800	Used oil	Knockout containment area
Aboveground tank	58	200	Used oil	Knockout containment area
Aboveground tank	59	500	Fuel oil	Warehouse building
Aboveground tank	62	2,300	Used oil	Warehouse building
Drums (400 maximum)	—	55	Used oil	Warehouse building
Transformer units (2)	—	150 maximum	Transformer oil	Office building and warehouse

Source: S-K, 2011

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

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

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

4.0 DISCHARGE RESPONSE

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

4.1.1 FACILITY CONTACTS

Facility Response Coordinator:	Darwin "Troy" Robinson	
	Office:	(352) 266-0320
	Mobile:	(352) 425-0819
Alternate Contacts:	Joe Ventry	
	Office:	(352) 687-0688
	Mobile:	(352) 304-0023
Safety-Kleen INFOTRAC	Telephone:	(800) 468-1760

4.1.2 DISCHARGE NOTIFICATION

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

4.1.3 STATE AND LOCAL EMERGENCY RESPONSE AGENCIES

Fire/Police Department	Telephone:	911

4.1.4 AVAILABLE SPILL RESPONSE CONTRACTORS

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

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

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

4.2.1 PERSON DISCOVERING DISCHARGE

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

4.2.2 FACILITY RESPONSE COORDINATOR

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

4.2.3 RESPONSE PROCEDURE

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

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

4.3 DISCHARGE NOTIFICATION

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

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

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

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

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

National Response Center	(800) 424-8802
EPA Region 4	(404) 562-8700
FDEP District Warning Point	(407) 893-3337

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

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

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

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

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

4.3.2.1 Federal Regulations

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

United States Environmental Protection Agency, Region 4
SPCC/FRP Coordinator
U.S. Environmental Protection Agency Region 4
61 Forsyth Street
Atlanta, Georgia 303365

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

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

The written report must contain the following information:

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

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

4.3.2.2 State Regulations

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

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

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

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

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

4.4 DISPOSAL OF RECOVERED MATERIALS (112.7[a][3][v])

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

4.5 FACILITY RESPONSE PLAN (112.20)

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

5.0 POTENTIAL DISCHARGE PREDICTIONS (112.7[b])

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

Table 5-1. Potential Discharge Predictions

Source	Type of Failure	Largest Container Volume (gallons)	Discharge Rate (gal/hr)	Direction of Flow	Containment (gallons)
Aboveground storage tanks within main tank farm area (Tanks 1 through 16)	Tank rupture, loading or unloading operations, fire, or explosion	30,000	30,000	For tank rupture or pipe failure, within the secondary containment area. In the event of secondary containment failure, to the southern retention pond.	Containment area capable of containing in excess of 75,000 gallons; southern retention pond capable of containing in excess of 520,000 gallons
Aboveground storage tanks within central tank farm area (Tanks 17 through 19 and 49)	Tank rupture, loading or unloading operations, fire, or explosion	20,000	20,000	For tank rupture or pipe failure, within the secondary containment area. In the event of secondary containment failure, to the southern retention pond.	Containment area capable of containing in excess of 31,000 gallons; southern retention pond capable of containing in excess of 520,000 gallons
Aboveground storage tanks within northern tank farm area (Tanks 20 through 23)	Drum rupture or leakage	20,000	20,000	For tank rupture or pipe failure, within the secondary containment area. In the event of secondary containment failure, to the northern retention pond.	Containment area capable of containing in excess of 29,000 gallons; northern retention pond capable of containing in excess of 65,000 gallons
Aboveground storage tanks within southern tank farm area (Tanks 24 through 31)	Tank rupture, loading or unloading operations, fire, or explosion	30,000	30,000	For tank rupture or pipe failure, within the secondary containment area. In the event of secondary containment failure, to the southern retention pond.	Containment area capable of containing approximately 31,000 gallons; southern retention pond capable of containing in excess of 520,000 gallons
Process area warehouse building (Tanks 32 through 46, 54,55, 58, and 59)	Tank rupture, loading or unloading operations, fire, or explosion	30,000	30,000	Within Warehouse Building. In the event of secondary containment failure, to the northern retention pond	Northern retention pond capable of containing in excess of 65,000 gallons
Used oil tank area (Tanks 50 and 51)	Tank rupture, loading or unloading operations, fire, or explosion	159,000	159,000	For tank rupture or pipe failure, within the secondary containment area. In the event of secondary containment failure, to the southern retention pond.	Containment area capable of containing approximately 156,000 gallons; southern retention pond capable of containing in excess of 520,000 gallons
Knockout tank area (Tanks 57 and 58)	Tank rupture or leakage	2,240	2,240	For tank rupture or pipe failure, within the secondary containment area. In the event of secondary containment failure, to the northern retention pond.	Containment area capable of containing approximately 2,100 gallons; northern retention pond capable of containing in excess of 65,000 gallons

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

Source	Type of Failure	Largest Container Volume (gallons)	Discharge Rate (gal/hr)	Direction of Flow	Containment (gallons)
Used oil tanks loading/ unloading area	Tank overfill, hose rupture, equipment failure	8,000	Varies, 300 gpm maximum	For tank rupture or pipe failure, within the secondary containment area. In the event of secondary containment failure, to the southern retention pond.	Containment area capable of containing approximately 2,300 gallons; southern retention pond capable of containing in excess of 520,000 gallons
Rail car loading/unloading area	Tank overfill, hose rupture, equipment failure	24,000	24,000	For tank rupture or pipe failure to the secondary containment area.	Containment area capable of containing in excess of 26,800 gallons
Drummed used oil waste/products warehouse building (maximum 400 drums stored)	Drum rupture or leakage	55	55	Within Warehouse Building. In the event of secondary containment failure, to the southern retention pond	Building capable of containing in excess of 55 gallons; southern retention pond is capable of containing in excess of 520,000 gallons
Maintenance oil products	Container rupture	<2.5	<2.5	Within safety cabinet. If escapes, to Warehouse Building floor (indoors).	Storage capacity in excess of 2.5 gallons
East loading /unloading area	Tank overfill, hose rupture, equipment failure	8,000	Varies, 300 gpm maximum	Area drains to northern retention pond.	Northern retention pond capable of containing in excess of 65,000 gallons
West loading /unloading area	Tank overfill, hose rupture, equipment failure	8,000	Varies, 300 gpm maximum	For tank rupture or pipe failure, within the secondary containment area. In the event of secondary containment failure, to the southern retention pond.	Containment area capable of containing approximately 4,950 gallons; southern retention pond capable of containing in excess of 520,000 gallons

Source: S-K, 2011.

6.0 DISCHARGE PREVENTION MEASURES, CONTROLS, AND COUNTERMEASURES

6.1 CONTAINMENT SYSTEMS AND DIVERSIONARY STRUCTURES AND EQUIPMENT (112.7[c])

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

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

Secondary containment structures are discussed in Section 6.10.2.

6.2 CONTINGENCY PLANNING (112.7[d])

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

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

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

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

6.4 PERSONNEL, TRAINING, AND DISCHARGE PREVENTION PROCEDURES (112.7[f])

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

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

6.4.2 DESIGNATED PERSON ACCOUNTABLE FOR DISCHARGE PREVENTION (112.7[f][2])

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

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

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

6.5 SECURITY (112.7[g])

6.5.1 FENCING (112.7[g][1])

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

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

6.5.2 VALVES (112.7[g][2])

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

6.5.3 PUMPS (112.7[g][3])

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

6.5.4 PIPING (112.7[g][4])

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

6.5.5 LIGHTING (112.7[g][5])

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

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

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

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

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

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

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

6.6.1 BEST MANAGEMENT PRACTICES (BMPS)

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

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

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

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

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

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

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

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

6.7 BRITTLE FRACTURE EVALUATION (112.7[i])

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

6.8 STATE DISCHARGE PREVENTION REQUIREMENTS (112.7[j])

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

6.9 FACILITY DRAINAGE (112.8[b])

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

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

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

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

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

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

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

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

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

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

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

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

6.10 BULK STORAGE CONTAINERS (112.8[c])

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

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

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

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

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

- Tanks 1 through 16 are located within a secondary containment area capable of containing in excess of 75,000 gallons. The largest container in the area is 30,000 gallons in capacity.
- Tanks 17 through 19 and 49 are located within a secondary containment area capable of containing in excess of 31,000 gallons. The largest container is 20,000 gallons in capacity.
- Tanks 20, 21, and 23 are located within a secondary containment area capable of containing in excess of 29,000 gallons. The largest container is 20,000 gallons in capacity.
- Tanks 24 through 31 are located within a secondary containment area capable of containing in excess of 31,000 gallons. The largest container is 30,000 gallons in capacity. The containment system is capable of containing the volume of the largest container but does not provide enough freeboard for precipitation, however, this area drains directly into the southern retention pond therefore providing additional alternative method of containment
- Tanks 32 through 41, 44 through 46, 54 through 56, 59, and 62 are located within the northern portion of the warehouse building. The building consists of an enclosed metal frame building with a concrete floor. The building is not equipped with floor drains. All doorways and entrances are equipped with a curb to minimize the outflow of any spilled material. The building is capable of containment area capable of containing in excess of 25,000 gallons. The largest container is 20,400 gallons in capacity
- Tanks 50 and 51 are located within a secondary containment area capable of containing approximately 156,400 gallons. Although the containment system is not capable of containing the volume of the largest container (i.e., 159,000 gallons), this area drains directly into the southern retention pond therefore providing additional alternative method of containment.

- Tank 58 and 59 are located within a secondary containment area capable of containing approximately 2,150 gallons (dry weather). Although the containment system is not capable of containing the volume of the largest container (i.e., 2,200 gallons), this area drains directly into the northern retention pond therefore providing additional alternative method of containment.
- All 55-gallon drums and filter collection bins are stored within the southern portion of the warehouse building which is capable of containing in excess of 55 gallons in the event of a spill. The building consists of an enclosed metal frame building with a concrete floor. The building is not equipped with floor drains. All doorways and entrances are equipped with a curb to minimize the outflow of any spilled material.

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

6.10.11 POSITION OF MOBILE OR PORTABLE OIL STORAGE CONTAINERS (112.8[c][11])

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

6.11 FACILITY TRANSFER OPERATIONS, PUMPING, AND FACILITUY PROCESS (112.8[d])

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

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

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

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

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

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

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

6.11.4 INSPECTION OF ABOVEGROUND VALVES, PIPING, AND APPURTENANCES (112.8[d][4])

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

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

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

7.0 SPCC IMPLEMENTATION

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

APPENDIX A

ADMINISTRATIVE UPDATES

APPENDIX A—ADMINISTRATIVE UPDATES

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

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

Table A-1. SPCC Plan Periodic Reviews Requiring Amendment

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

Number	Signature	Date
1		
2		
3		
4		
5		
6		

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

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

Number	Signature	Date
1		
2		
3		
4		
5		
6		

APPENDIX B

DISCHARGE REPORTS

APPENDIX B—DISCHARGE REPORTS

SAFETY-KLEEN FACILITY DISCHARGE REPORT

Facility Name: Safety-Kleen Ocala Facility

Facility Phone Number: (352) 687-0688

Facility Address: 359 Cypress Road, Ocala, Florida 34472

Largest Oil Storage Container: 159,000-gallons **Normal Daily Oil Throughput:** Varies

Facility Description: Oil processing facility

Incident Type **Evacuation Required?**

_____ Discharge to water that exceeds 1,000-gallons

_____ Two discharges to water that exceed 42-gallons each within 12-month period

_____ Discharge to water that violates applicable water quality standards

_____ Discharge to water that causes a sheen upon or discoloration of water surface

_____ Discharge to water that causes a sludge or emulsion to form beneath water surface

Incident Source and Location: _____

Incident Date: _____ **Weather Conditions:** _____

Approximate Time Incident Began: _____ **Discovered:** _____ **Ended:** _____

Material Discharged: _____ **Concentration of Discharge:** _____

Total Quantity Discharged: _____ gallons **Qty. Discharged to Navigable Waters:** _____ gallons

Affected Media: _____

Transportation Characteristics of Media into Which Material Discharged: _____

Person Possessing or Controlling Material at Time of Discharge: _____

Address: _____ **Phone Number:** _____

Person Having Actual Knowledge of Facts Surrounding Discharge: _____

Address: _____ **Phone Number:** _____

Person to Contact for Additional Information Concerning Discharge: _____

Address: _____ **Phone Number:** _____

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

Cause of Discharge, Including Failure Analysis: _____

Efforts Taken to Control or Mitigate Discharge: _____

Harmful Effects of Discharge, if Known: _____

Damages or Injuries Caused by Discharge: _____

Corrective Actions and Countermeasures Taken, Including Equipment Repairs and Replacements: _____

Measures Taken or Planned to Reduce Possibility of Recurrence: _____

Present or Proposed Remedial Action at Site of Discharge: _____

Individuals and/or Organizations Contacted: _____

Prepared by: _____ **Title:** _____

Signature: _____ **Date:** _____

Discharge Report Form

PLEASE PRINT OR TYPE

DEP Form # 62-761.900(1)
Form Title Discharge Report Form
Effective Date: July 13, 1998

Instructions are on the reverse side. Please complete all **applicable** blanks

1. Facility ID Number (if registered):_____ **2. Date of form completion**:_____

3. General information
Facility name or responsible party (if applicable):_____
Facility Owner or Operator, or Discharger: _____
Contact Person:_____Telephone Number: ( )_____County: _____
Facility or Discharger Mailing Address: _____
Location of Discharge (street address):_____
Latitude and Longitude of Discharge (if known)_____

4. Date of receipt of test results or discovery of confirmed discharge: _____month/day/year

5. Estimated number of gallons discharged:_____

6. Discharge affected: [ ] Air [ ] Soil [ ] Groundwater [ ] Drinking water well(s) [ ] Shoreline [ ] Surface water (water body name) _____

7. Method of discovery (check all that apply)

[ ] Liquid detector (automatic or manual)	[ ] Internal inspection	[ ] Closure/Closure Assessment
[ ] Vapor detector (automatic or manual)	[ ] Inventory control	[ ] Groundwater analytical samples
[ ] Tightness test	[ ] Monitoring wells	[ ] Soil analytical tests or samples
[ ] Pressure test	[ ] Automatic tank gauging	[ ] Visual observation
[ ] Statistical Inventory Reconciliation	[ ] Manual tank gauging	[ ] Other _____

8. Type of regulated substance discharged: (check one)

[ ] Unknown	[ ] Used/waste oil	[ ] Jet fuel	[ ] Heating oil	[ ] New/lube oil
[ ] Gasoline	[ ] Aviation gas	[ ] Diesel	[ ] Kerosene	[ ] Mineral acid

[ ] Hazardous substance - includes CERCLA substances from USTs above reportable quantities, pesticides, ammonia, chlorine, and derivatives (write in name or Chemical Abstract Service (CAS) number)_____
[ ] Other_____

9. Source of Discharge: (check all that apply)

[ ] Dispensing system	[ ] Pipe	[ ] Barge	[ ] Pipeline	[ ] Vehicle
[ ] Tank	[ ] Fitting	[ ] Tanker ship	[ ] Railroad tankcar	[ ] Airplane
[ ] Unknown	[ ] Valve failure	[ ] Other Vessel	[ ] Tank truck	[ ] Drum

[ ] Other_____

10. Cause of the discharge: (check all that apply)

[ ] Loose connection	[ ] Puncture	[ ] Spill	[ ] Collision	[ ] Corrosion
[ ] Fire/explosion	[ ] Overfill	[ ] Human error	[ ] Vehicle Accident	[ ] Installation failure

[ ] Other_____

11. Actions taken in response to the discharge: _____

12. Comments: _____

13. Agencies notified (as applicable):

[ ] State Warning Point 1-***800 320-0519***	[ ] National Response Center ***1-800-424-8802***	[ ] Florida Marine Patrol ***(800) 342-5367***	[ ] Fire Department. _____	[ ] DEP (district/person) [ ] County Tanks Program

14. To the best of my knowledge and belief, all information submitted on this form is true, accurate, and complete.

_____ Printed Name of Owner, Operator or Authorized Representative, or Discharger

_____ Signature of Owner, Operator or Authorized Representative, or Discharger

Oil spills to navigable waters of the United States, and releases of reportable quantities of CERCLA hazardous substances must be reported within one hour to the National Response Center or the Florida Marine Patrol. Reports to the National Response Center of oil spills to navigable waters need not be repeated to any other federal, state, or local agency. Conditions at the site that do not involve spills to navigable waters of the United States, or CERCLA hazardous substances, that pose an immediate threat to human health or the environment, must be immediately reported to the State Warning Point or the Local Fire Department. This form must be submitted for all discharges from facilities with storage tank systems, and at other sites, in accordance with Chapters 62-761 and 62-770, F.A.C. Chapter 62-761 and 62-770, F.A.C., should be consulted for specific reporting requirements.

State Warning Point	*National Response Center*	*Local Fire Department*
1-800-320-0519	*1-(800)-424-8802*	*(obtain local number)*

This form must be used to report any confirmed discharge, or any one of the following from a storage tank system subject to Chapter 62-761, F.A.C., unless the discharge is from a previously-known and reported discharge:

1. Results of analytical or field tests of surface water, groundwater, or soils indicating the presence of contamination by:
    a. A hazardous substance from a UST;
    b. A regulated substance, other than petroleum products; or
    c. Petroleum products' chemicals of concern specified in Chapter 62-770, F.A.C.;
2. A spill or overfill event of a regulated substance to soil equal to or exceeding 25 gallons, unless the regulated substance has a more stringent reporting requirement specified in CFR Title 40, Part 302;
3. Free product or sheen of a regulated substance present in surface water, groundwater, soils, basements, sewers, and utility lines at the facility or in the surrounding area; or
4. Soils stained by regulated substances observed during a closure assessment performed in accordance with Rule 62-761.800, F.A.C.

A copy of this form must be delivered or faxed to the County within 24 hours of the discovery of a discharge, or before the close of the next business day. It is recommended that the original copy be sent in the mail. If the discharge occurs at a county-owned facility, a copy of the form must be faxed or delivered to the local FDEP District office. A discharge of petroleum or petroleum products from a source other than a regulated storage tank system must be reported within one week of discovery in accordance with Rule 62-770.250, F.A.C.

FDEP District Office Addresses:

Northwest District
160 Governmental Center
Pensacola FL. 32501-5794
Phone: 850-595-8360
FAX: 850-595-8417

Northeast District
7825 Baymeadows Way Suite B 200
Jacksonville FL. 32256-7590
Phone: 904-448-4300
FAX: 904-448-4362

Central District
3319 Maguire Blvd. Suite 232
Orlando, FL. 32803-3767
Phone: 407-894-7555
FAX: 407-897-2966

Southwest District
3804 Coconut Palm Dr.
Tampa FL. 33619-8218
Phone: 813-744-6100
FAX: 813-744-6125

South District
2295 Victoria Ave. Suite 364
Ft. Myers FL. 33901-2549
Phone: 813-332-6975
FAX: 813-332-6969

Southeast District
400 N. Congress Ave.
West Palm Beach, FL. 33416-5425
Phone: 561-681-6600
FAX: 561-681-6790

[Effective date of the rule]

DEP Form # 62-761.900(6)
Form Title Incident Notification Form
Effective Date: July 13, 1998

Incident Notification Form

PLEASE PRINT OR TYPE

Instructions are on the reverse side. Please complete all applicable blanks

1. Facility ID Number (if registered):_____ **2. Date of form completion**:_____

3. General information

Facility name:_____
Facility Owner or Operator: _____
Contact Person:_____Telephone number: ( )_____County: _____
Facility mailing address: _____
Location of incident (facility street address):_____
Latitude and Longitude of incident (If known.)_____

4. Date of Discovery of incident:_____month/day/year

5. Monitoring method that indicates a possible release or an incident: (check all that apply)

[ ] Liquid detector (automatic or manual)
[ ] Vapor detector (automatic or manual)
[ ] Tightness test
[ ] Pressure test
[ ] Breach of integrity test
[ ] Visual observation
[ ] Groundwater samples
[ ] Monitoring wells
[ ] Internal inspection
[ ] Odors in the vicinity
[ ] Automatic tank gauging
[ ] Manual tank gauging
[ ] Closure
[ ] Inventory control
[ ] Statistical Inventory Reconciliation
[ ] Groundwater analytical samples
[ ] Soil analytical tests or samples
[ ] Other_____

6. Type of regulated substance stored in the storage system: (check one)

[ ] Diesel
[ ] Gasoline
[ ] Heating oil
[ ] Used\waste oil
[ ] Aviation gas
[ ] Jet fuel
[ ] New/lube oil
[ ] Kerosene
[ ] Other _____
[ ] Hazardous substance - includes CERCLA substances, pesticides, ammonia, chlorine, and their derivatives, and mineral acids.
(write in name or Chemical Abstract Service (CAS) number)_____

7. Incident involves or originated from a: (check all that apply)

[ ] Tank **[ ]** Unusual operating conditions **[ ]** Dispensing equipment **[ ]** Pipe **[ ]** Overfill protection device
[ ] Piping sump **[ ]** Release detection equipment **[ ]** Secondary containment system **[ ]** Other **[ ]** Dispenser Liners
[ ] Loss of >100 gallons to an impervious surface other than secondary containment **[ ]** Loss of >500 gallons within secondary containment

8. Cause of the incident, if known: (check all that apply)

[ ] Overfill (<25 gallons)
[ ] Faulty Probe or sensor
[ ] Spill (<25 gallons)
[ ] Human error
[ ] Theft
[ ] Installation failure
[ ] Corrosion
[ ] Other_____

9. Actions taken in response to the incident: _____

10. Comments: _____

11. Agencies notified (as applicable):

[ ] Fire Department. **[ ]** Local Program **[ ]** DEP (district/person)

12. To the best of my knowledge and belief, all information submitted on this form is true, accurate, and complete.

_____ _____
Printed Name of Owner, Operator or Authorized Representative Signature of Owner, Operator or Authorized Representative.

APPENDIX C

INSPECTION RECORDS

APPENDIX C—INSPECTION RECORDS

SAFETY-KLEEN OCALA FACILITY VISUAL INSPECTION RECORD

Inspector(s):_____

Address:
359 Cypress Road
Ocala, Florida 34472

Date of Inspection: _____

Location	Inspection Items	Yes	No	N/A	Comments
Main tank farm Tanks (1 through 16)	Tank Shell				
	Secondary Containment				
	Valves				
	Piping				
	Evidence of Spills				
Central tank farm Tanks (17 through 19, 49)	Tank Shell				
	Secondary Containment				
	Valves				
	Piping				
	Evidence of Spills				
Northern tank farm Tanks (21 through 23)	Tank Shell				
	Secondary Containment				
	Valves				
	Piping				
	Evidence of Spills				
Southern tank farm (Tanks 24 through 31)	Tank Shell				
	Secondary Containment				
	Valves				
	Piping				
	Evidence of Spills				
Process warehouse (Tanks 32 through 36, 38 through 41, 44 through 46, 54, 55, 58, and 59)	Tank Shell				
	Valves				
	Piping				
	Evidence of Spills				
	Spill Kit				
Used oil tank farm (Tanks 50 through 51)	Tank Shell				
	Secondary Containment				
	Valves				
	Piping				
	Evidence of Spills				

Location	Inspection Items	Yes	No	N/A	Comments
Knockout tank farm (Tanks 57 through 58)	Tank Shell				
	Secondary Containment				
	Valves				
	Piping				
	Evidence of Spills				
Drummed used oil product area	Condition of Drums				
	Evidence of Spills				
	Condition of Drums				
Rail car loading/unloading area	Secondary Containment				
	Valves				
	Spill Kit				
	Evidence of Spills				
Used oil tanks loading/unloading area	Secondary Containment				
	Valves				
	Spill Kit				
	Evidence of Spills				
Eastern loading/unloading area	Secondary Containment				
	Valves				
	Spill Kit				
	Evidence of Spills				
Western loading/unloading area	Secondary Containment				
	Valves				
	Spill Kit				
	Evidence of Spills				
Northern retention pond	Accumulated Storm Water				
	Evidence of Spills				
	Signs of Erosion				
Southern retention pond	Accumulated Storm Water				
	Evidence of Spills				
	Signs of Erosion				

Additional Comments: _____

APPENDIX D

PERSONNEL TRAINING RECORDS

APPENDIX D—PERSONNEL TRAINING RECORDS

SAFETY-KLEEN OCALA FACILITY PERSONNEL TRAINING RECORD

Course Title: _____

Address:
359 Cypress Road
Ocala, Florida 34472

Instructor: _____

Date: _____

Signature	Printed Name	Social Security Number

Topics Covered

APPENDIX E

DISCHARGE PREVENTION BRIEFING RECORDS

APPENDIX E—DISCHARGE PREVENTION BRIEFING RECORDS

Course Title: _____

Address:
359 Cypress Road
Ocala, Florida 34472

Instructor: _____

Date: _____

Attendees		
Signature	**Printed Name**	

Topics Covered

APPENDIX F

SECONDARY CONTAINMENT DRAINAGE RECORDS

APPENDIX F—SECONDARY CONTAINMENT DRAINAGE RECORDS

SAFETY-KLEEN OCALA FACILITY SECONDARY CONTAINMENT DRAINAGE RECORD

Date of Event:_____

Person Responsible for Draining Containment:_____

Secondary Containment Area	Evidence of Oil Contamination?		Estimated Volume (Gallons)	Comments
	Yes	No		

ATTACHMENT G

CONTINGENCY PLAN

SAFETY KLEEN SYSTEMS, INC.

OCALA, FLORIDA

CONTINGENCY PLAN

[AS REQUIRED BY 40 CFR 279.52]

PREPARED BY:

1408 North Westshore Boulevard
Suite 115
Tampa, Florida 33607
Telephone: (813) 289-9338
Fax: (813) 829-9388
www.ectinc.com

110341-0200-1200
September 14, 2011

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LIST OF FIGURES

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

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

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

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

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

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

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

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

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

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

Marion County Fire Rescue
2122 Pine Road
Ocala, FL 34472
(352) 291-8000 or 911

Marion County Sheriff's Department
501 Water Road
Ocala, FL 34472
(352) 402-6000 or 911

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

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

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

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

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

FACILITY SIGNALS AND COMMUNICATION

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

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

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

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

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

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

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

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

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

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

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

(A) Activate internal facility alarms or communication systems, where applicable, to notify all facility personnel; and

(B) Notify appropriate state or local agencies with designated response roles if their help is needed.

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

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

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

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

Agency	Contact Number
State of Florida Department of Environmental Protection (Central District)	407-894-7555
State Warning Point	850-413-9911
Department of Planning and Environmental Protection (Marion County)	954-519-1400
State Emergency Response Commission	800-635-7179
Columbia County Health Department, Storage Tank Program Office	386-758-2140

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

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

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

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

6.1 FIRE RESPONSE PROCEDURE

1. In case of fire, use nearest telephone to call the fire department by dialing 911; activate the nearest fire pull box if one is available.

2. Notify everyone in the immediate area of the fire verbally that there is a fire and instruct them to evacuate the area according to the primary/secondary evacuation routes to the muster point;

3. If you have received proper fire extinguisher training, and are confident that you can control the fire in its incipient stage, located the closest fire extinguisher and attempt to extinguish the fire. If uncertain or untrained on fire extinguisher use, immediately vacate the area, and proceed to the muster point. **Do not attempt to use a fire extinguisher if you are unsure of your ability to control the fire**. Leave the immediate area!

4. Notify the facility EC or Secondary Emergency Coordinator (SEC) and adhere to any subsequent instructions issued by the EC during the emergency.

5. Provide the EC with any information you may have regarding the nature of the fire emergency.

6.2 EXPLOSION RESPONSE PROCEDURE

1. In the event of an explosion, use nearest telephone to summon the fire department by dialing 911; activate the nearest fire pull box if one is available. Do not enter any rooms, structures or areas that may appear to be damaged or compromised as a result of the explosion;

2. Scan the area for any fellow workers or visitors, and instruct them to evacuate to the evacuation muster point;

3. Visually survey the immediate area for any fires that may have been initiated from the explosion. Do not enter any areas, structures or locations that appear to have been structurally compromised from the explosion.

4. If you have received proper fire extinguisher training, and are confident that you can control an incipient fire, locate the closest fire extinguisher and attempt to extinguish the fire. ***If uncertain or untrained on fire extinguisher use, immediately vacate the area, and proceed to the muster point***. Do not attempt to use a fire extinguisher if you are unsure of your ability to fully extinguish the fire. Leave the immediate area!

5. Notify everyone in the immediate area of the fire verbally that there is a fire and instruct them to evacuate the affected area according to the primary/secondary evacuation routes to the muster point;

6. Notify the facility EC or Secondary Emergency Coordinator and adhere to any subsequent instructions issued by the EC during the emergency.

7. From a safe location, assist the EC by sharing any information or observations you may have made regarding the facility subsequent to the explosion to the EC.

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

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

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

1) During the emergency, the S-K EC or his/her designee will also take all reasonable measures necessary to ensure that fires, explosions, and releases do not occur, recur, or spread to other used oil or regulated/hazardous waste at the facility. These measures may include:

   - Suspending/stopping processes and normal facility operations;
   - Collecting and containing released used oil; and
   - Removing or isolating containers.

2) If cessation of oil recovery operations is required in response to a fire, explosion, or release, the EC or his/her designee will monitor for leaks, pressure buildup, gas generation, or ruptures in valves, pipes, or other equipment at all appropriate areas.

3) Immediately after an emergency, the S-K EC will coordinate the necessary recycling, storing, or disposing of recovered used oil, contaminated soil or surface water, or any other material that results from a release, fire, or explosion at the facility, as may be required.

4) Subsequent the emergency event, S-K management will notify the Regional Administrator, and state and local authorities that the facility is in compliance with paragraphs (b)(6)(viii)(A) and (B) of this section before operations are resumed in the affected area(s) of the facility. [Please refer to Appendix A for a copy of 40 CFR 279.52].

5) The EC must make note in the operating records, of the time, date and details of *any facility incident* requiring the implementation of this contingency plan.

6) The owner or operator must notify the Regional Administrator, and appropriate state and local authorities that the facility is in compliance with paragraphs (b)(6)(viii)(A) and (B) of this section *before operations* are resumed in the affected area(s) of the facility.

ATTACHMENT H

UNIT MANAGEMENT DESCRIPTIONS

A. UNIT MANAGEMENT PLAN

STORAGE TANKS

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

FACILITY STANDARDS

S-K maintains an internal communications system consisting of telephones, pagers, cellular phones, audible alarms and electrical alarms. Fire extinguishers (portable type) are located within the control booth and at each exit/entrance and every 50 linear feet. All facility equipment is tested and/or inspected regularly. Copies of inspection/testing documentation are provided in the SPCC Plan. Housekeeping is implemented as required by S-K personnel to ensure adequate space for the unobstructed movement of spill response personnel and equipment. All local authorities have received a copy of S-K's SPCC Plan at the initial start up of the facility. The local authorities were notified again on July 26, 2006 due to the proposed major modifications to the facility. S-K will clean close the facility as per 40 CFR Part 265 Subparts G and J. S-K has complied with RCRA Section 3010.

TANK FARM CONTAINMENT CALCULATIONS

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

STORAGE TANK REGISTRATION

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

STRUCTURAL INTEGRITY

The structural integrity of the storage tanks, processing piping and process meet the performance standards for new storage tank systems in F.A.C. 62-762.500.

STORAGE AREA CAPACITIES

The storage areas operated by S-K are separated into five specific areas for bulk storage in tanks and container storage. The tank farm has 16 tanks for bulk storage of used oil, fuel oil, marine diesel fuel (finished product), and petroleum contact water in the MTFSA. Two additional tank-receiving areas were constructed in 2001-2002. The two additional storage tank areas were constructed north and south of the existing MTFSA. The construction was similar to the existing MTFSA. The area of the North Tank Farm is approximately 1,890 square feet (ft^2). The area of the South Tank Farm is approximately 1,800 ft^2.

OCALA TANK FARM STORAGE TANK CONTENTS AND CAPACITIES

Tank Name/Capacity (Gallons)	Material	Type	Contents	Tank Construction Date
Tank # 1/30,000	STEEL	Aboveground	Marine/Diesel Used Oil	11-9-99
Tank # 2/30,000	STEEL	Aboveground	Marine/Diesel Used Oil	11-9-99
Tanks 3 through 6/30,000	STEEL	Aboveground	Fuel Oil/Used Oil	11-9-99
Tank # 7/30,000	STEEL	Aboveground	PCW- Petroleum Contact Water	11-9-99
Tank # 8 through 16/30,000	STEEL	Aboveground	Used Oil	11-9-99
Tanks RS 1- RS3/20,000	STEEL	Aboveground	Industrial Wastewater / Antifreeze	11-9-99
Tanks RSS1-RSS8/30,000	STEEL	Aboveground	Used Oil	11-9-99
Tanks #50 and 51/159,000	STEEL	Aboveground	Used Oil/Industrial Wastewater	11-9-99

Source; S-K-2011

The North and South Tank Farm secondary containment areas are connected to the MTFSA. A second area south of the Tank Farm (TM) was constructed in 2004. The Southern Tank Farm Area is approximately 2,448 ft² in size. The South Tank Farm has three tanks, each with a capacity of 20,000 gallons, for receiving industrial wastewater. The South Tank Farm also has a stormwater and diesel fuel tank. The tank numbers are RS1 through RS3 (17 through 19).

The North Tank Farm has four tanks, each with a capacity of 20,000 gallons, for receiving industrial wastewater or antifreeze. The tank numbers are RN1 through RN4 (20 through 23). The North Tank Farm Area also has stormwater and gasoline tanks with capacities of approximately 9,400 and 200 gallons. The Southern Tank Farm Area has eight tanks, each with a capacity of 30,000 gallons. The tanks are numbered RSS1 through RSS8 (23 through 30). The UOIWWSA has two 159,000 aboveground storage tanks. The tanks are numbered 50 and 51. The UOIWWSA has a loading/unloading area. Tank number 50 is for used oil storage and tank number 51 is for industrial wastewater storage.

The MTFSA secondary containment area has an effective capacity of approximately 158,280 gallons, which is sufficient to contain the volume of the largest tank. The South Tank Farm has a secondary containment capacity of 40,074.3 gallons. The North Tank Farm has a secondary containment capacity of 34,509.0 gallons. The Southern Tank Farm Area has a secondary containment capacity of 45,616.7 gallons. The combined tank farm containment areas have a capacity of 278,480.0 gallons. The loading/unloading areas on the east and west side of the tank farm have a secondary containment capacity of approximately 342 gallons. New secondary containment curbs are to be added to the loading/unloading areas on the west side of the tank farm in the future to give a secondary containment capacity of 9,901.3 gallons. The west loading/unloading area has a trench secondary containment system that brings its total capacity to 6,068.5 gallons. The use of temporary booms 20-ft by 40-ft by 10-inches increases the effective containment volume to 10,058 gallons.

B. SAFETY-KLEEN OCALA UNIT MANAGEMENT PLAN

The UOIWWSA has a secondary containment capacity of 188,266.5 gallons. The UOIWWSA Bulk Petroleum Storage Area loading/unloading area has a secondary containment capacity of 9,931 gallons. The drum and container storage area is located in the south end of the warehouse. The types of waste stored in the drum and container storage area include used oil, used oil filters, antifreeze, sludge, and petroleum contaminated soil. Petroleum contact water will not be stored in the drum or container storage area. Waste will be stored in Department of Transportation approved shipping drums or containers. The shipping containers may be "roll-off" boxes (15, 20, or 40 cubic yard [yd^3]), dump trailers, or drums (5, 10, 15, or 55 gallon). The container storage area has a secondary containment capacity of approximately 24,248 gallons. The container storage area is divided into areas to allow the storage of 420 each waste 55-gallon drums (23,100 gallons), 24 each chemical product 55-gallon drums (1,320 gallons), five each 475-gallon totes (2,375 gallons), and three each waste 40-yd^3 roll-off boxes (24,240 gallons). Adequate aisle space is maintained between rows of containers. The containers are inspected weekly to ensure the containers are in good condition and are not leaking using the *Nonhazardous Waste Weekly Inspection Form*. (See Form examples provided in Attachment D.)

The Re-refining Area is located in the north end of the warehouse building. The secondary containment capacity is 32,340 gallons and the largest tank is 13,000 gallons. The Knockout Tank Area has a secondary containment capacity of 2,652-gallons after a new 6-inch containment curb is added. The volume of the largest tank in the Knockout Tank Area is 2,302.7 gallons.

The Rail Tanker Loading/Unloading Facility Secondary Containment holds 27,117.9 gallons. The proposed earthen berms have a capacity of 53,527 gallons. The maximum rail tanker capacity that can be currently operated at the facility is 24,653 gallons.

SOLID WASTE MANAGEMENT AREA (SWMA)

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

INSPECTIONS

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

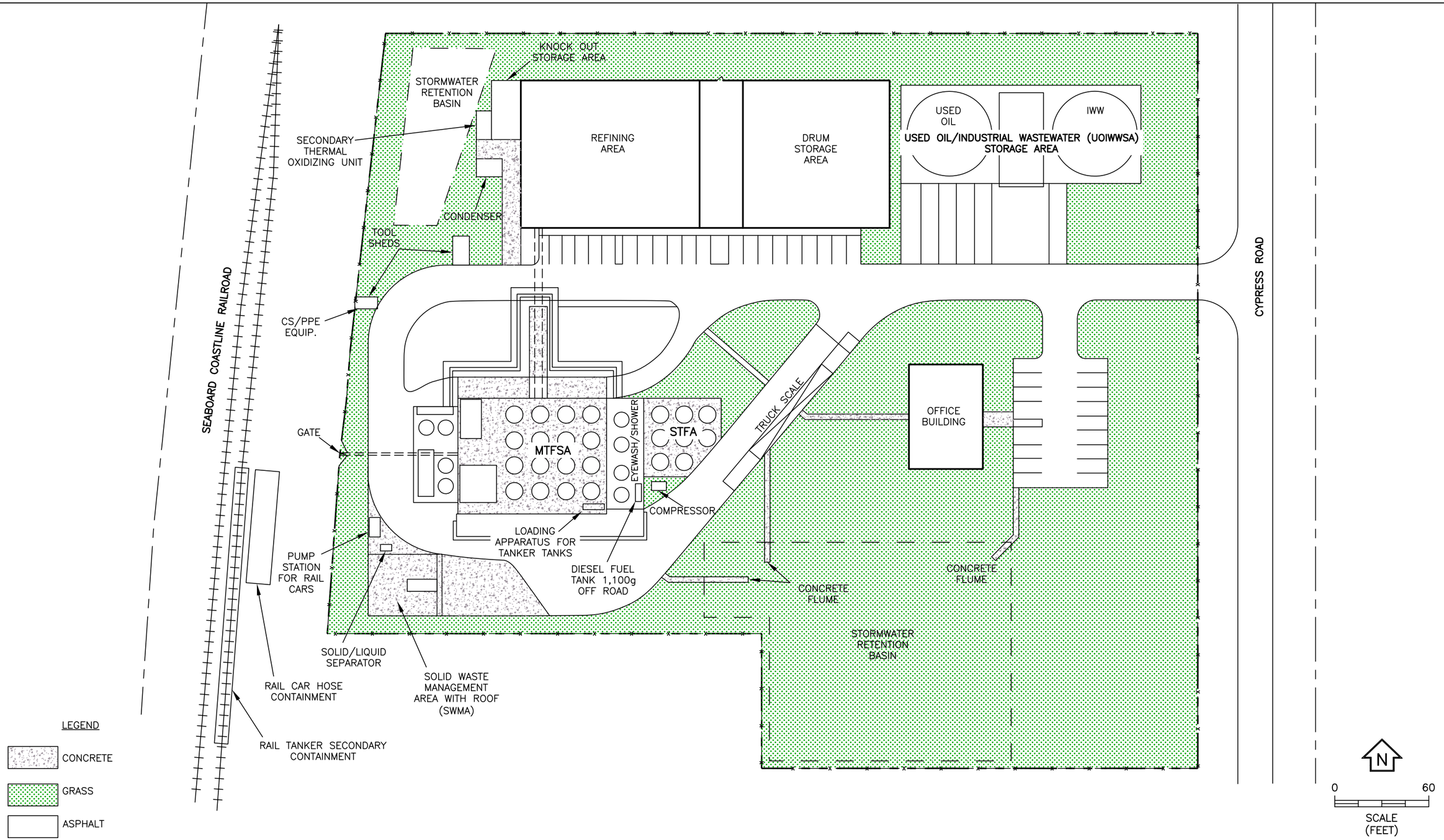


FIGURE 1.
SITE PLOT PLAN
SAFETY–KLEEN SYSTEMS, INC.
OCALA, FLORIDA

Sources: Engineering, Inc., 2007; ECT, 2012.

STORAGE TANK AND DRUM STORAGE INSPECTION FORM

STORAGE TANK AND DRUM STORAGE INSPECTION

INSPECTOR'S SIGNATURE: (Full Signature, do not Initial)

MONDAY	TUESDAY	WEDNESDAY	THURSDAY	FRIDAY
Date: Time	Date: Time	Date: Time	Date: Time	Date: Time
Signature	Signature	Signature	Signature	Signature

STORAGE TANK: (Enter Tank Number)	Mon. in/gal	Tues. in/gal	Wed. in/gal	Thurs. in/gal	Fri. in/gal
High Level Alarms / Level Gage:	A N	A N	A N	A N	A N
If 'N' circle appropriate problem: malfunctioning 'Power On' light, malfunctioning siren/strobe light, other:					
Tank Farm	A N	A N	A N	A N	A N
If 'N' circle appropriate problem: cracks, debris in dike, open drums in dike, ponding/wet spots, stains, deterioration, displacement, leaks, stormwater drain closed, other:					
Rigid Piping and Supports / Grounding:	A N	A N	A N	A N	A N

TRANSFER PUMPS AND HOSES					
Pump Seals:	A N	A N	A N	A N	A N
If 'N' circle appropriate problem: leaks, other:					
Motors:	A N	A N	A N	A N	A N
If 'N' circle appropriate problem: overheating, other:					
Fittings:	A N	A N	A N	A N	A N
If 'N' circle appropriate problem: leaks, other:					
Valves:	A N	A N	A N	A N	A N
If 'N' circle appropriate problem: Leak, sticking, other:					

STORAGE TANK AND DRUM STROAGE INSPECTION

wk beginning _____
Date

Hose Connections and Fittings:	A N	A N	A N	A N	A N
If 'N' circle appropriate problem: cracked, loose, leaks, other:					
Hose Body:	A N	A N	A N	A N	A N
If 'N' circle appropriate problem: crushed, thin spots, leaks, cracked, other:					
ASSOCIATED EQUIPMENT					
Spill Kit:	A N	A N	A N	A N	A N
If 'N' circle appropriate problem: inadequate supply of absorbent, towels and/or clay, clean, organized, other:					
Fire Protection Equipment:	A N	A N	A N	A N	A N
If "N" circle appropriate problem: no extinguisher, not fully charged, no annual inspection, dented, missing safety pin other:					
Emergency Alarm:	A N	A N	A N	A N	A N
If "N" circle appropriate problem: Alarm does not sound in office when tested, other:					
Overhead Loading Arm:	A N	A N	A N	A N	A N
If 'N' circle appropriate problem: dirty, leaks, missing piece, other:					

Drum Storage Area * Remember to check your drum logs for accuracy					
Drum Floor:	A N	A N	A N	A N	A N
If 'N' circle appropriate problem: cleanliness, proper aisle spacing, ponding or residues, other:					
Drum Pallets:	A N	A N	A N	A N	A N
If 'N' circle appropriate problem: overall condition, broken boards, exposed nails, severe staining, other:					
Spill Kit:	A N	A N	A N	A N	A N
If 'N' circle appropriate problem: inadequate supply of absorbent, towels and/or clay, clean, organized, other:					
Drum Condition:	A N	A N	A N	A N	A N
If 'N' circle appropriate problem: sediment buildup, leaks, rust, split seams, distortion, deterioration, excess debris, not labeled, proper closure, dented, other:					
Stormwater Inspection Items * note that all discharges from secondary containment must be documented on your logs					
Tank Farm	A N	A N	A N	A N	A N
If "N" circle appropriate problem: drains or sump pumps not closed or powered down, oil spilled (note gallons), stormwater present, sheen present, other:					
Loading/unloading area	A N	A N	A N	A N	A N
If "N" circle appropriate problem: evidence of spillage, debris, sheen present, drains or sump pumps not closed or powered down, other:					
Outdoor storage areas	A N	A N	A N	A N	A N
If "N" circle appropriate problem: evidence of spillage, debris, sheen present, drains or sump pumps not closed or powered down, containers not secure, poor housekeeping, other:					

OBSERVATIONS:

COMMENTS; NOT ACCEPTABLE ITEMS		DATE AND NATURE OF REPAIR/CORRECTION

A = Acceptable N = Not Acceptable

ATTACHMENT I

FACILITY CLOSURE PLAN AND SCHEDULE

INTRODUCTION

This closure plan presents the program to be implemented by Safety-Kleen Systems, Inc. (S-K) for the entire tank farm, a waste drum storage area, an oil processing/re-refinery unit and associated containment area(s). The Main Tank Farm Storage Area (MTFSA) has 16 tanks total with 12 used oil tanks, two fuel oil tanks, one petroleum contact water tank and one marine diesel fuel tank. The South Tank Farm (STF) has three tanks for receiving industrial wastewater, one stormwater tank, and one diesel fuel tank. The North Tank Farm (NTF) has three industrial wastewater tanks, one antifreeze tank, one gasoline tank, and one stormwater tank. The Southern Tank Farm Area (STFA) has an additional eight tanks for used oil storage. The entire Tank Farm collectively has 34 bulk storage tanks. The Tank Farm has two stormwater storage tanks of 9,400-gallon (NTF) and 14,100-gallon (STF) capacity. The Tank Farm has a 200-gallon (NTF) gasoline tank and a 1,128-gallon (STF) diesel fuel tank. The Used Oil/Industrial Waste Water Storage Area has two tanks.

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

FACILITY LOCATION

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

HAZARDOUS WASTE PERMIT

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

FACILITY CONTACT

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

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

FACILITY DESCRIPTION

2.1 PROCESS DESCRIPTION

S-K is an industrial wastewater transfer facility, used oil processor and used oil re-refinery located in Ocala, Florida. S-K performs transfer operation on non-hazardous industrial wastewater and the recovery/recycling of petroleum products and/or reusable materials from various commercial and industrial sources. S-K receives non-hazardous waste from six major sources in accordance with its existing environmental permits. They are as follows:

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

S-K is dedicated to the transfer operations of industrial wastewater, petroleum contact water (PCW) and contaminated petroleum products through a relatively simple process which recovers petroleum product and then stores the water prior to shipment to a permitted industrial pretreatment facility. S-K has applied for and received a FDEP permit to recycle "used oil" for resale as industrial burner fuel and re-refiner of used oil for resale as marine diesel fuel. Operations commenced in the first quarter of 2000.

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

Once Quality Assurance protocols are met, each waste stream is unloaded through appropriate lines to the designated storage/treatment tanks for process initiation. Wastewaters are transferred to storage tanks and shipped to a permitted industrial pretreatment facility for treatment and discharge to a Publicly Owned Treatment Works (POTW). All sludges are pumped to the sludge pit area for further dewatering. The remaining solids are solidified via mixing with inert materials to produce a solid waste. The solidified solid waste stream is sampled and analyzed for a hazardous waste determination. The solidified sludges will be disposed of at an EPA-licensed RCRA facility if the waste stream is determined to be a hazardous waste. The liquid removed from these processes are stored on-site and transferred offsite for permitted industrial wastewater pretreatment. Any petroleum product recovered is tested for compliance with the federal used oil regulations found in 40 CFR Part 279 and the federal polychlorinated biphenols regulations found in 40 CFR Part 7 61.20(e). All petroleum product is sold to end users. The estimated life of the operation is 30 years.

2.2 WASTE CHARACTERISTICS

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

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

2.3 OPERATIONAL HISTORY

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

2.4 UNIT DESCRIPTIONS

2.4.1 TANK SYSTEMS

2.4.1(a) Tanks

All process/storage tanks are constructed of steel. The combined volume of the tanks in the entire tank farm is approximately 1,264,155 gallons.

2.4.1(b) Secondary Containment Systems

Processing Unit

Situated near the northeast corner of subject site is a sophisticated re-refinery, processing and used oil dehydration system. The entire system area is in-doors walled on all sides. The floor is constructed of 6-inch thick, reinforced concrete. Concrete berms and sumps exist below the surface level of the foundation. All concrete is sealed. The composition or type of sealer is of epoxy construction. The containment berms are constructed of concrete masonry units and also are sealed to a height of 4-inches above floor level with the same type of sealer mentioned above. The roof cover is metal in this area. The area of the processing units is approximately 12,000 square feet (ft^2).

Solid Waste Solidification Area

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

2,448 ft² in size. A Used Oil/Industrial Waste Water Storage Area of approximately 10,400 ft² was added in 2005.

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

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

3.0 CLOSURE PROCEDURES

3.1 GENERAL

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

3.2 CLEAN CLOSURE PROCEDURES

3.2.1 WASTE CHARACTERIZATOIN

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

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

3.2.2 TREATMENT/STORAGE TANK/PIPING CLOSURE

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

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

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

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

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

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

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

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

3.2.2 CONCRETE TANK PAD CLOSURE

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

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

3.3 EQUIPMENT DECONTAMINATION

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

4.0 CONTINGENCY PLAN

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

4.1 CLEAN CLOSURE VERIFICATION

FDEP Storage Tank system Closure Assessment Requirements soil sampling is required for visually stained soils. Soil samples should be obtained as close to the fill port area as possible or from the "worse case" visually stained soil. For the purpose of obtain clean closure soil samples will be collected from around each of the tank farm areas and nearest to the former location of the

If soil sampling is necessary, a 4-inch core will be mechanically drilled through the concrete containment pad(s) if cracks and visible staining was observed prior containment area cleaning/decontamination procedures described above. A soil sample will then be collected from a depth of 0 to12 inches using a 3.25-inch diameter stainless

steel auger. Analytical parameters will be the same as previously listed in closure procedures. A background soil sample will be collected from an area of the facility not affected by facility operations and analyzed for the same parameters. The data that will be used to determine if the soil underlying the concrete pad(s) has been contaminated by used oil will be the analytical results from the soil sample collected from beneath the tank pad(s). The area will be deemed to be clean if the parameters are below FDEP Clean Soil Guidance Criteria as stated in F.A.C. 62-777, except for parameters that are equal to or are lower than the natural background concentration.

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

4.2 SOIL EXCAVATION

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

4.3 SOIL SAMPLING

For soil samples collected from the edges of or beneath the concrete pad. Soil samples will only be collected from beneath the concrete pads if visual staining is observed near an observed crack in the pad. After coring of the concrete at each area to be sampled, a polyethylene sheet will be placed on the pad near the sampling location. For all other soil samples, a polyethylene sheet will be placed on the ground adjacent to the sampling location. All sampling equipment and sample containers will be placed

on the sheets when not in use. Soil samples will be collected from a depth of 0-12 inches using a stainless steel 3.25-inch diameter auger bit on a hand held auger. The soil samples will be placed in glass sample containers provided by the contract laboratory. All sample containers will be labeled with the facility name, sampling location, sample identification number and date and time of sample collection. All sample containers will be placed in plastic bags on ice in an insulated cooler. Appropriate chain-of-custody forms will be completed and sent to the analytical laboratory with the samples. All used sampling equipment will be decontaminated on site.

4.4 SAMPLING QUALITY CONTROL PROCEDURES

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

- Prior to initiating any soil and groundwater sampling activities, all sampling equipment will be decontaminated using Alconox detergent, potable water, propanol, deionized water and wrapped in plastic bags to reduce the potential for contamination prior to use. Groundwater sampling will be conducted using dedicated unused polypropylene tubing. Latex gloves will be worn by all sampling personnel during sampling activities and changed between each sampling location to prevent cross contamination. All sample containers will be obtained from the laboratory providing the analytical services. All sample containers will be placed in sealed plastic bags, on ice, in an insulated cooler prior to shipment to the analytical laboratory. The chain-of-custody form(s) and samples will then be transported to the analytical laboratory within 24 hours of sample collection.

4.5 SOIL SAMPLE ANALYSIS

All soil samples collected from the areas adjacent to or beneath the tank pad(s) will be analyzed for the parameters listed on the attached Table I-2.

4.6 GROUNDWATER SAMPLING

Groundwater samples will be collected in accordance with DEP SOP001/01 FS 2200. Groundwater will be sampled at locations to be determined based on soil sampling described above. At least one monitoring well will be placed at the point of highest soil contamination,, o monitoring well will be placed upgradient for background data and monitoring wells will be placed down gradient. Groundwater samples will be obtained from each well using a peristaltic pump for low flow purging as a quiescent sampling method. The groundwater samples will be analyzed for parameters listed in **Table I-3** The analytical parameter list may also be modified to reflect changes in city, state or federal law. Groundwater will be assessed to define a contaminant plume should one be identified. The groundwater assessment will be completed in accordance with FDEP Tank Closure Assessment Guidelines.

5.0 CLOSURE COST ESTIMATE

The cost estimate to complete the closure activities is presented in Enclosure (1). The estimate is based on clean closure of each unit. The tank and concrete pad decontamination will be performed by a professional tank cleaning service and continually monitored by a professional engineer's (P.E.) representative. The P.E. will make periodic site inspections for collecting samples and verifying the decontamination procedures. A final closure report will be prepared by the engineer's representative and certified by the P.E. The total cost to perform the closure activities is estimated at $12,315.95. This cost estimate also includes soil sampling and analyses as described in Section 4.0, Contingency Plan.

Table I-1. Oil Storage

Legend:
WW = Wash Water
IWW = Industrial Waste Water
PCW = Petroleum Contact Water

Bulk Storage Container (Type of Tank)	Tank Number	Container Volume (gallons)	Contents (Type of Oil)	Location Onsite	Waste Stream
Aboveground tank	1	30,000	Used oil	Main tank farm containment area	WW
Aboveground tank	2	30,000	Used oil	Main tank farm containment area	WW
Aboveground tank	3	30,000	Used oil	Main tank farm containment area	WW
Aboveground tank	4	30,000	Used oil	Main tank farm containment area	WW
Aboveground tank	5	30,000	Used oil	Main tank farm containment area	WW
Aboveground tank	6	30,000	Used oil	Main tank farm containment area	WW
Aboveground tank	7	30,000	Used oil	Main tank farm containment area	WW
Aboveground tank	8	30,000	Used oil	Main tank farm containment area	WW
Aboveground tank	9	30,000	Used oil	Main tank farm containment area	WW
Aboveground tank	10	30,000	Used oil	Main tank farm containment area	WW
Aboveground tank	11	30,000	Used oil	Main tank farm containment area	WW
Aboveground tank	12	30,000	Used oil	Main tank farm containment area	WW
Aboveground tank	13	30,000	Used oil	Main tank farm containment area	WW
Aboveground tank	14	30,000	Used oil	Main tank farm containment area	WW
Aboveground tank	15	30,000	Used oil	Main tank farm containment area	WW
Aboveground tank	16	30,000	Used oil	Main tank farm containment area	WW
Aboveground tank	17	20,000	Industrial wastewater	Central tank farm containment area	IWW
Aboveground tank	18	20,000	Industrial wastewater	Central tank farm containment area	IWW
Aboveground tank	19	20,000	Industrial wastewater	Central tank farm containment area	IWW
Aboveground tank	20	20,000	Industrial wastewater	North tank farm containment	IWW
Aboveground tank	21	20,000	Industrial wastewater	North tank farm containment	IWW
Aboveground tank	23	20,000	Industrial wastewater	North tank farm containment	IWW
Aboveground tank	24	30,000	Used oil	South tank farm containment area	WW

Table I-1. Oil Storage

Legend:
WW = Wash Water
IWW = Industrial Waste Water
PCW = Petroleum Contact Water

Bulk Storage Container (Type of Tank)	Tank Number	Container Volume (gallons)	Contents (Type of Oil)	Location Onsite	Waste Stream
Aboveground tank	25	30,000	Used oil	South tank farm containment area	WW
Aboveground tank	26	30,000	Used oil	South tank farm containment area	WW
Aboveground tank	27	30,000	Used oil	South tank farm containment area	WW
Aboveground tank	28	30,000	Used oil	South tank farm containment area	WW
Aboveground tank	29	30,000	Used oil	South tank farm containment area	WW
Aboveground tank	30	30,000	Used oil	South tank farm containment area	WW
Aboveground tank	31	30,000	Used oil	South tank farm containment area	WW
Hot Gas Generator	32	20,468	Hot gas generator	Warehouse building	IWW
Aboveground tank	33	5,260	Used oil	Warehouse building	WW
Aboveground tank	34	6,000	Recovered process water	Warehouse building	PCW
Aboveground tank	35	1,000	Oil	Warehouse building	WW
Aboveground tank	36	6,000	Low flash recovery	Warehouse building	WW
Aboveground tank	37	1,000	Used oil	Warehouse building	WW
Aboveground tank	38	5,027	Condensate	Warehouse building	PCW
Aboveground tank	39	6,000	Low flash recovery	Warehouse building	WW
Aboveground tank	40	6,000	Fuel oil/mineral oil	Warehouse building	WW
Aboveground tank	41	6,000	Low flash recovery	Warehouse building	WW
Aboveground tank	44	2,700	Fuel oil	Warehouse building	WW
Aboveground tank	45	2,700	Fuel oil	Warehouse building	WW
Aboveground tank	46	13,000	Fuel oil	Warehouse building	WW
Aboveground tank	49	1,100	Diesel	Central tank farm containment area	WW
Aboveground tank	50	159,000	Used oil	Southeast containment area	WW
Aboveground tank	51	159,000	Industrial water	Southeast containment area	WW
Aboveground tank	54	150	Oily water	Warehouse building	PCW
Aboveground tank	55	150	Oily water	Warehouse building	PCW
Aboveground tank	56	200	Used oil	Warehouse building	WW

Table I-1. Oil Storage				Legend: WW = Wash Water IWW = Industrial Waste Water PCW = Petroleum Contact Water	
Bulk Storage Container (Type of Tank)	**Tank Number**	**Container Volume (gallons)**	**Contents (Type of Oil)**	**Location Onsite**	**Waste Stream**
Aboveground tank	57	800	Used oil	Knockout containment area	WW
Aboveground tank	58	200	Used oil	Knockout containment area	WW
Aboveground tank	59	500	Fuel oil	Warehouse building	WW
Aboveground tank	62	2,300	Used oil	Warehouse building	WW
Drums (400 maximum)	—	55	Used oil	Warehouse building	
Transformer units (2)	—	150 maximum	Transformer oil	Office building and warehouse	

6.0 CLOSURE SCHEDULE

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

7.0 CLOSURE CERTIFICATION

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

8.0 FINANCIAL ASSURANCE

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

conjunction, to meet the requirements of a designated facility for PCW as defined in Chapter 62-740, F.A.C.

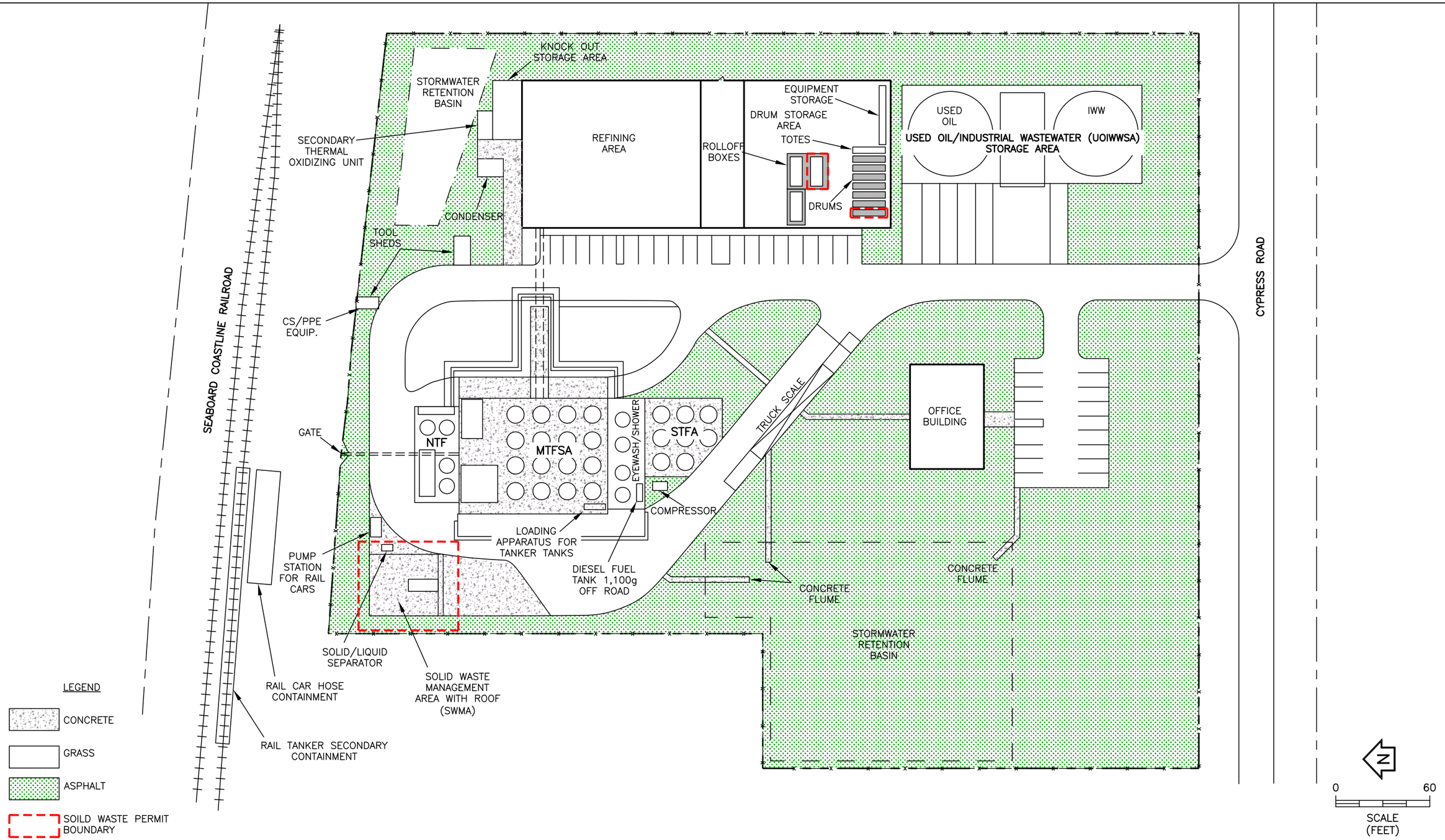
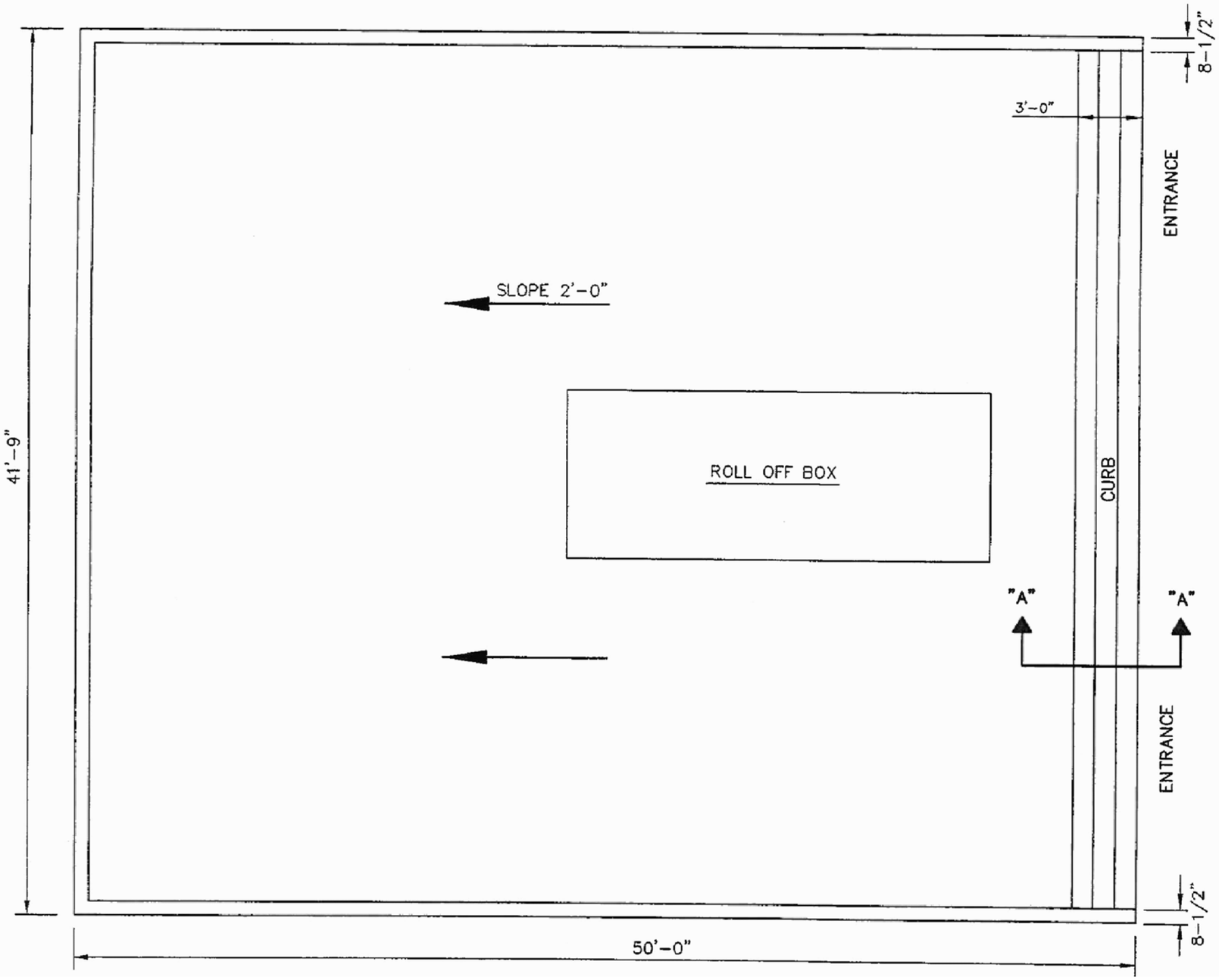
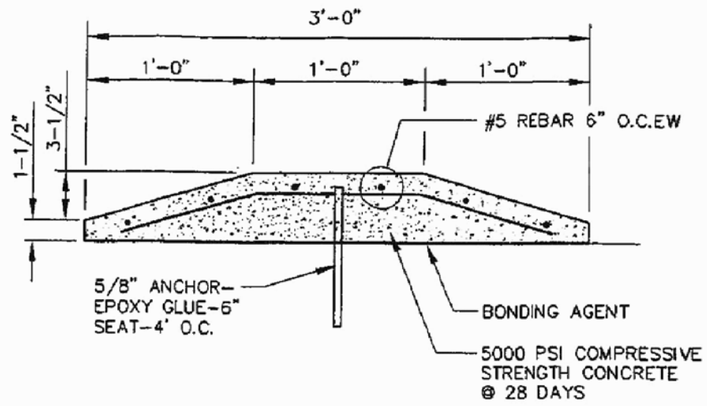


FIGURE I-1.
SOLID WASTE PERMIT BOUNDARY
SAFETY–KLEEN SYSTEMS, INC.
OCALA, FLORIDA

Sources: Engineering, Inc., 2007; ECT, 2012.





SECTION "A" – "A"

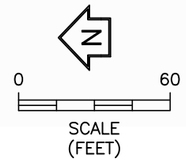


FIGURE I-2.
SOLID WASTE MANAGEMENT AREA
SAFETY–KLEEN SYSTEMS, INC.
OCALA, FLORIDA

Sources: Engineering, Inc., 2007; ECT, 2012.

ATTACHMENT I-1

COST ESTIMATE

Print Form

Florida Department of Environmental Protection

Bob Martinez Center • 2600 Blair Stone Road • Tallahassee, Florida 32399-2400

DEP Form #62-710.901(7)
Form Title Used Oil Facility Financial Assurance Closing Cost Estimate Form
Effective Date June 9, 2005

Used Oil Processing Facility Closing Cost Estimate Form

Date: _____ Date of DEP Approval: _____

I. GENERAL INFORMATION: Latitude: 29°04'95" Longitude: 81°59'49" EPA ID Number: FLR00 0060 301

Facility Name: Safety-Kleen Systems, Inc. Permit Number: 08301 38-004 AO

Facility Address: 359 Cypress Road, Ocala, FL 33472

Mailing Address: 359 Cypress Road, Ocala, FL 33472

Contact Person's Name: Troy Robinson Phone Number: (352) 687-0688

Fax Number: _____

Email: _____

II. TYPE OF FINANCIAL ASSURANCE DOCUMENT (Check Type)

_____ Letter of Credit* _____ Performance Bond* _____ Guaranty Bond*

*Indicate mechanisms that require use of a Standby Trust Fund Agreement

__X__ Insurance Certificate _____ Financial Test _____ Trust Fund Agreement

III. ESTIMATE ADJUSTMENT: (check and use either box a or b, below)

40 CFR Part 264, Subpart H, as adopted by reference in Rule 62-701.630, Florida Administrative Code, sets forth the method of annual cost estimate adjustment. Cost estimates may be adjusted by using an inflation factor or by recalculating the maximum costs of closing in current dollars. Estimates are due annually between January 1 and March 1. Select one of the methods of cost estimate adjustment below.

☐ **(a) Inflation Factor Adjustment**

Inflation adjustment using an inflation factor may only be made when a Department approved closing cost estimate exists and no changes have occurred in the facility operation which would necessitate modification to the closure plan. The inflation factor is derived from the most recent Implicit Price Deflator for Gross National Product published by the U.S. Department of Commerce in its survey of Current Business. The inflation factor is the result of dividing the latest published annual Deflator by the Deflator for the previous year. The inflation factor may also be obtained from the Solid Waste Financial Coordinator at (850) 245-8732 or be found online at http://www.dep.state.fl.us/waste/categories/swfr/

This adjustment is based on the Department approved closing cost estimate dated: _____

_____	X	_____	=	_____
Latest DEP approved Closing Cost Estimate		Current Year Inflation Factor		Inflation Adjusted Annual Closing Cost Estimate

Signature: _____ Phone: _____

Name and Title: _____ E-Mail: _____

If you have questions concerning this form, please contact the Used Oil Permitting Coordinator at the address below, by phone at (850) 245-8781, or by E-Mail at: Bheem.Kothur@dep.state.fl.us

Please mail this completed cost estimate to:

Used Oil Permitting Coordinator
MS4560
FDEP
2600 Blair Stone Road
Tallahassee, FL 32399-2400

Please email or mail a copy of the cost estimate to:

Solid.Waste.Financial.Coordinator@dep.state.fl.us
Solid Waste Financial Coordinator
MS 4565
FDEP
2600 Blair Stone Road
Tallahassee, FL 32399-2400

☐ **(b) Recalculated Cost Estimates (complete items IV and V)**

IV. RECALCULATIONS OF CLOSING COSTS

For the time period in the facility's operation when the extent and manner of its operation makes closing **most expensive**.

Third Party Estimate/Quote must be provided for each item.
Costs must be for a third party providing all materials and labor.

DESCRIPTION	UNIT	QUANTITY	UNIT COST	TOTAL
1. Decontamination and Disposal				
Note: These costs must be broken down by individual waste stream. If contamination is found, the cost estimate must be recalculated to include remediation costs.				
a. Used Oil tanks, containers, piping, equipment and secondary containment decontamination	EA	1	$201,080.00	$201,080.00
waste characterization	Included in	other tasks		0.00
disposal	EA	1	$ 21,500.00	$ 21,500.00
b. Wash water waste characterization	EA	1	$ 4,893.00	$ 4,893.00
disposal	GAL	314,090	$ 0.12	$ 37,690.77
c. Sludges/ sediment waste characterization	EA	1	$ 6,333.00	$ 6,333.00
disposal	Tons	25.28	$ 100.00	$ 2,528.31
d. Used oil filter management waste characterization	EA	1	$ 3,013.00	$ 3,013.00
disposal	Drum/Load	1	$ 6,990.00	$ 6,990.00
e. Petroleum Contaminated Water (PCW), tanks, containers, piping, equipement and secondary containment waste characterization	EA	1	$ 1,773.00	$ 1,773.00
disposal	Gal	11,327	$ 0.12	$ 1,359.24
f. Mobilization Costs	EA	1	$ 1,875.00	Included in Other tasks
g. other Solid Waste Mgmt. Area	EA	1	$ 6,918.00	$ 6,918.00
Disposal	EA	1	$ 5,397.95	$ 5,397.95
		Subtotal (1) Decontamination/Disposal:		$299,476.27

2. Engineering (on-site inspections and Quality Assurance are to be included in this item).

a. Closure sampling and analysis plan implementation as described in the permit application	$ 25,255.00
b. Closure Certification Report	$ 9,618.00
Subtotal (2) Professional Services:	$ 34,873.00
Subtotal of (1) and (2) Above:	$334,349.27
3. Contingency (10% of the Subtotal)	$ 33,434.93
Closing Cost Subtotal:	$ 334,349.27
TOTAL CLOSING COST:	$ 367,784.20

V. CERTIFICATION BY ENGINEER and OWNER/OPERATOR

This is to certify that the Financial Assurance Cost Estimates pertaining to the engineering features of the this solid waste management facility have been examined by me and found to conform to engineering principals applicable to such facilities. In my professional judgment, the Cost Estimates are a true, correct and complete representation of the financial liabilities for closing of the facility, and comply with the requirements of Florida Administrative Code (F.A.C.), Rule 62-701.630 and all other Department of Environmental Protection rules, and statutes of the State of Florida. It is understood that the Financial Assurance Cost Estimates shall be submitted to the Department **annually** between January 1 and March 1of each year and revised, adjusted and updated as required by Rule 62-701.630(4), F.A.C.

2/16/2012
Signature of Engineer

Signature of Owner/Operator

Stanley T. Stokes, P.E.
Engineer's Name and Title (please print or type)

Lin Longshore, Vice President - EHS
Owner's Name and Title (please print or type)

33251
Florida Registration Number (please print or type)

803-359-2061
Owner/Operator's Telephone Number

6440 Southpoint Parkway,
Jacksonville, FL 32216
Engineer's Mailing Address

Owner/Operator's E-Mail Address

(804) 296-0544
Engineer's Telephone Number

Sstokes@ectinc.com
Engineer's email address

ATTACHMENT I-2

SUPPORTING BACKGROUND DATA

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

Waste Characterization Laboratory Sampling

Solid Waste

Thermal Treatment	*Method No.*	*Allowable Limit*
TCLP Aresnic	1311/7060	5.0 mg/L
TCLP Barium	1311/7080	100.0 mg/L
TCLP Cadmium	1311/7131	1.0 mg/L
TCLP Chromium	1311/7191	5.0 mg/L
TCLP Lead	1311/7421	5.0 mg/L
TCLP Mercury	1311/7471	0.2 mg/L
TCLP Selenium	1311/7740	1.0 mg/L
TCLP Silver	1311/7761	5.0 mg/l
TCLP Volatiles	1311/624/8260	Refer to 40 CFR 261.24
Total Organic Halides	1311/624/8260	Refer to 40 CFR 261.24
TCLP PCBs	1311/8082	50 mg/L
TPH	FL-PRO	n/a

Solid Waste

Landfill	*Method No.*	*Allowable Limit*
TCLP Aresnic	1311/7060	5.0 mg/L
TCLP Barium	1311/7080	100.0 mg/L
TCLP Cadmium	1311/7131	1.0 mg/L
TCLP Chromium	1311/7191	5.0 mg/L
TCLP Lead	1311/7421	5.0 mg/L
TCLP Mercury	1311/7471	0.2 mg/L
TCLP Selenium	1311/7740	1.0 mg/L
TCLP Silver	1311/7761	5.0 mg/l
TCLP Volatiles	1311/624/8260	Refer to 40 CFR 261.24

Closure Assessment

Soil	*Method No.*	*Allowable Limit*
Volatile Organics	8260	Refer to Chapter 62-777 F.A.C.
Semivolatile Organics	8270	Refer to Chapter 62-777 F.A.C.
TRPHs	FL-PRO	Refer to Chapter 62-777 F.A.C.
Arsenic	6010	Refer to Chapter 62-777 F.A.C.
Cadmium	6010	Refer to Chapter 62-777 F.A.C.
Chromium	6010	Refer to Chapter 62-777 F.A.C.
Lead	6010	Refer to Chapter 62-777 F.A.C.
PCBs	8080/8270	Refer to Chapter 62-777 F.A.C.

Groundwater	*Method No.*	*Allowable Limit*
Volatile Organics	8260	Refer to Chapter 62-777 F.A.C.
Semivolatile Organics	8270	Refer to Chapter 62-777 F.A.C.
TRPHs	FL-PRO	Refer to Chapter 62-777 F.A.C.
Arsenic	6010	Refer to Chapter 62-777 F.A.C.
Cadmium	6010	Refer to Chapter 62-777 F.A.C.
Chromium	6010	Refer to Chapter 62-777 F.A.C.
Lead	6010	Refer to Chapter 62-777 F.A.C.
PCBs	8080/8270	Refer to Chapter 62-777 F.A.C.

Source: Millennium Laboratory, ECT 2012.

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

Used Oil

Parameters	*Method No.*	*Allowable Limit*
Flash Point	1010/1030	>140 F (>60 C)
% Water		
Arsenic	1311/7060	5.0 mg/L
Barium	1311/7080	100.0 mg/L
Cadmium	1311/7131	1.0 mg/L
Chromium	1311/7191	5.0 mg/L
Lead	1311/7421	5.0 mg/L
Total Chlorine (Halogens)	1311/624/8260	Refer to 40 CFR 261.24
Total Sulfur	9075	Refer to 40 CFR 261.24
PCB	8082	Refer to 40 CFR 261.24

Wash Water/PCW

Parameters	*Method No.*	*Allowable Limit*
Flash Point	1010/1030	>140 F (>60 C)
pH	150.1	>2 or < 12.5
Arsenic	1311/7060	5.0 mg/L
Barium	1311/7080	100.0 mg/L
Cadmium	1311/7131	1.0 mg/L
Chromium	1311/7191	5.0 mg/L
Lead	1311/7421	5.0 mg/L
Mercury	1311/7471	0.2 mg/L
Selenium	1311/7740	1.0 mg/L
Silver	1311/7761	5.0 mg/l
Benzene	1311/624/8260	0.5 mg/L

Sludges

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

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

Task 1.a.	Used Oil Tanks, Containers, Piping, Equipment and Secondary Containment Decontamination		$201,080.00
	Waste Characterization		Incl. 1.b, 1.c, 1.e
	Disposal		$21,500.00
Task 1.b.	Wash Water Waste Characterization		$4,893.00
	Disposal		$37,690.77
Task 1.c.	Sludge/Sediment Waste Characterization		$6,333.00
	Disposal		$2,528.31
Task 1.d.	Used Oil filter Waste Characterization		$3,013.00
	Disposal		$6,990.00
Task 1.e.	PCW Waste Characterization		$1,773.00
	Dispoal		$1,359.24
Task 1.f.	Mobilization	$1,875.00	Incl in other tasks
Task 1.g.	Solid Waste Management Area		$6,918.00
	Dispoal		$5,397.95
	Subtotal (1) Decontamination/Disposal		$299,476.27
Task 2.a.	Enginerring Closure Sampling & Analyses		$25,255.00
Task 2.b.	Closure Certification Report		$9,618.00
Sub-Total			$334,349.27
Task 3	Contingency (10%)		$33,434.93
Total Closure Cost Estimate			$367,784.20

Table 1-4. Facility Closure Cost Estimate Worksheet

Site Name: **Safety-Kleen Systems, Inc. Ocala**
Task Description: Site Closure
Date: February 15, 2012

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

Labor Category	Hourly Rate	A	B	C	D	E	F	G	H	Totals
Administrative Support	$52	2							14	16
Graphics/Drafting	$69	4							10	14
Field Technician	$63		3	3	3	3		24		36
Senior Technician	$75	120	3	3	3	3	24	24		180
GIS Specialist	$65									0
Senior GIS Specialist	$105									0
Associate Engineer/Scientist I	$85									0
Associate Engineer/Scientist II	$92									0
Sr. Associate Eng/Scientist I	$105									0
Sr. Associate Eng/Scientist II	$109									0
Staff Engineer/Scientist I	$118									0
Staff Engineer/Scientist II	$127	20								20
Sr. Engineer/Scientist I	$138									0
Sr. Engineer/Scientist II	$147	20	1	1	1	1	8	10	30	72
Principal Engineer/Scientist	$162	10	1	1	1	1	1	4	20	39
TOTAL HOURS		**176**	**8**	**8**	**8**	**8**	**33**	**62**	**74**	**377**
SUBTOTAL LABOR		**16,480.00**	**723.00**	**723.00**	**723.00**	**723.00**	**3,138.00**	**5,430.00**	**9,068.00**	**$37,008.00**
Equipment Rental(core drill, sampling equip		150.00	75.00	75.00	75.00	75.00	75.00	675.00		$1,200.00
										$0.00
Vehicle Rental Field Truck		1,125.00	75.00	75.00	75.00	75.00	225.00	225.00		$1,875.00
Travel (per diem)										$0.00
Other Direct Costs		525.00	120.00	120.00	120.00	120.00	120.00	125.00	550.00	$1,800.00
SUBTOTAL ODCS		**1,800.00**	**270.00**	**270.00**	**270.00**	**270.00**	**420.00**	**1,025.00**	**550.00**	**$4,875.00**
Laboratory Analysis			3,900.00	5,340.00	2,020.00	780.00	3,360.00	18,800.00		$34,200.00
Waste Disposal		21,500.00	37,690.77	2,528.31	6,990.00	1,359.24	5,397.95			$75,466.27
										$0.00
Decommission/Clean Intrastructure		182,800.00					Incl. in Task A			$182,800.00
										$0.00
										$0.00
SUBTOTAL SUBCONTRACTOR		**204,300.00**	**41,590.77**	**7,868.31**	**9,010.00**	**2,139.24**	**8,757.95**	**18,800.00**	**0.00**	**$292,466.27**
Markup										$0.00
Total Subtask Cost		**$222,580.00**	**$42,583.77**	**$8,861.31**	**$10,003.00**	**$3,132.24**	**$12,315.95**	**$25,255.00**	**$9,618.00**	**$334,349.27**
Total Subtask Cost w/o Disposal		**$201,080.00**	**$4,893.00**	**$6,333.00**	**$3,013.00**	**$1,773.00**	**$6,918.00**	**$25,255.00**	**$9,618.00**	**$258,883.00**

Source: ECT 2012

Table I-5. Safety-Kleen Systems, Inc. Ocala Used Oil Processing Facility

Volume Estimates Tanks/Piping/Containment/Processing/Storage Areas

Tanks		Total Storage		
Assumptions		Capacity (gallons)	Radius	Square Footage
All storage tanks volumes to be converted to square footage.		1,264,155	54.67	**23931**
To calculate internal square footage, assume one tank is 18 feet tall.				
Secondary Containment Square ft	sq ft			
Processing Unit	12,000			
Main Tank Farm Storage Area	7,500			
Addition 2001-2002	1,890			
Addition 2004	2,448			
New Used Oil/IWW Storage Area-2007	10,400			
Drum/Sludge Warehouse	10,000			
Rail Tank Loading/Unloading	1,440			
Solid Waste Management Unit NW	2,000			
Total Secondary Containment Area Sq Ft	47,678			
Piping square ft estimate	1,500			
All tanks square ft estimate	23,931			
Total Tank/Piping Estimated Square Footage from above	25,431			
Total Estimated Square Footage for Cleaning	**73,109**			
Decontamination Wastes (Wash Water)				
Assume 0.2 gal/sq ft	14,622 gallons			
Unit Transportation/Disposal/gal	$0.12			
Disposal	$1,754.61			
Waste Characterization Samples: assume 10 samples @ $195/ea.	$1,950.00			
Industrial Waste Water (Wash Water)				
Storage capacity of 299,468-gallons	299,468 gallons			
Unit Transportation/Disposal/gal	$0.12			
Disposal	$35,936.16			
Waste Characterization Samples: assume 10 samples @ $195/ea.	$1,950.00			
Sludge/Sediment Wastes				
Assume 0.5% volume sludge for total capacity	6,321 gallons			
Assume weight of sludge is 8 pounds per gallon	50,566 pounds			
Pounds to tons	25.28 tons			
Transportation/Disposal/ton	$100.00			
Total	$2,528.31			
Waste Characterization Samples: assume 6 samples @ $890/ea.	$5,340.00			
Used Oil Filter Waste Characterization				
Assume 200: 55-gallon drums @ $75/drum	$1,650.00			
Assume 3 rolloff boxes @ $1,780/load	$5,340.00			
Waste Characterization Samples: assume 4 samples @ $505/ea.	$2,020.00			
PCW Waste Characterization				
Storage capacity of 11,327-gallons	11,327			
Transportation/Disposal/gal	$0.12			
Disposal	$1,359.24			
Waste Characterization Samples: assume 4 samples @ $195/ea.	$780.00			
Solid Waste Management Area Closure				
20-55 gallon drums	20 each			
Transportation/Disposal/drum	$100.00			
Disposal	$2,000.00			
30,204-gallons solidified	30,204 gallon			
Assume 9 pounds per gallon	271,836 pounds			
Assume 8 roll off boxes	135.9 tons			
Transportation/Disposal/ton	$25.00			
Disposal	$3,397.95			
Total Disposal	$5,397.95			
Waste Characterization Samples: assume 6 samples @ $560/ea.	$3,360.00			

Source: Safety-Kleen Systems, ECT 2012.

Millennium Laboratories Inc.
12721 Race Track Road
Tampa, FL 33626-1314
Phone: (813) 925-3871
Fax: (813) 925-3872

Quote #: QT021312-01
Project Name: Safety-Kleen

Quote Date: 02.13.12
Project Manager: Kathy Sheffield

MLI Quotation

Client Information

Federal ID #: E01-0709107

Attention: Mr. Bob Colberg
Company: Environmental Consulting & Technology
Address: 1408 N. Westshore Blvd. Suite 115
Tampa, FL 33607

Phone: 813-289-9338
Fax: 813-289-9388

PARAMETER/METHOD	TAT	MATRIX	QTY.	Unit Price	Total Price
EPA 1010 Ignitability	10 days	used oil	1	$50.00	$50.00
% Water	15 days	used oil	1	$100.00	$100.00
EPA 6010 Metals (AsCdCrPb)	10 days	used oil	1	$100.00	$100.00
Total Halogens	10 days	used oil	1	$75.00	$75.00
Total Sulfur	15 days	used oil	1	$100.00	$100.00
EPA 8082 PCB	5 days	used oil	1	$80.00	$80.00
EPA 1010 Ignitability	10 days	WW	1	$50.00	$50.00
EPA 1311/6010/7470 TCLP-RCRA 8 Metals	10 days	WW/Sludge	1	$160.00	$160.00
EPA 8260 - Benzene (total)	5 days	WW	1	$40.00	$40.00
EPA 1311/8260 TCLP-Volatiles	10 days	Sludge	1	$160.00	$160.00
EPA 1311/8270 TCLP-Semivolatiles (BNA)	10 days	Sludge	1	$250.00	$250.00
EPA 1311/8081 TCLP-Pesticides	10 days	Sludge	1	$150.00	$150.00
EPA 1311/8321 TCLP-Herbicides	10 days	Sludge	1	$170.00	$170.00
EPA 6010/7471 RCRA 8 Metals (total)	5 days	Solid Waste	1	$90.00	$90.00
EPA 8260 - Volatile Organics	5 days	Solid Waste	1	$90.00	$90.00
FL-PRO TRPH	5 days	Solid Waste	1	$60.00	$60.00
Total Organic Halides (TOX)	10 days	Solid Waste	1	$100.00	$100.00
EPA 8082 PCB	5 days	Solid Waste	1	$80.00	$80.00
				Total Cost:	$1,905.00

TERMS AND ADDITIONAL CONDITIONS:

Millennium Laboratories, Inc. (MLI) will provide sample containers with appropriate preservatives, custody records, and coolers. Client staff will be required to fill the designated containers and return them to MLI via express courier to meet EPA holding times. Millennium Laboratories staff are available to accept samples Monday through Friday, 0800-1800, and Saturdays from 0800-1200 via FedEx or other courier service.

All analytical protocols follow EPA SW-846, 40CFR Part 136, EPA 600/4-79-020 or FDEP guidelines.

TAT is based on business days after MLI sample receipt. Weekends and holidays are not included when determining TAT. Samples received after 1700 will be logged in as being received the following business day.

MLI standard deliverables include sample results, laboratory blank results, batch precision and accuracy results, and dates of preparation and analysis.These batch specific QC items are included at no charge. Field blanks, sample rinseates, and other QA related samples will be invoiced at the same rate as field samples.

Analysis for Ignitability, % water, Total Halogens, Total Sulfur, TCLP-Herbicides, and Total Organic Halides will be subcontracted to an approved laboratory.

Except for subcontracted analyses, all analytical results will be reported to the method detection limits listed in the current MLI Precision, Accuracy, and MDL (PAM) Manual. Subcontracted analyses will be reported to the subcontractor's currently published method detection limits, where applicable.

Suncoast Environmental Construction Group

Mr. Troy Montgomery
Safety-Kleen Systems, Inc.
Used Oil Processing Facility
359 Cypress Road Silver Spring Shores
Ocala, Florida 34472

February 10, 2012

Re: Suncoast Proposal #9206

Dear Mr. Montrgomery,

Suncoast price for removal and cleanup of your Ocala Facility.

The Scope of Work is:

❖ Removal of all dyke walls to land fill within 20 miles	$21,500.00
❖ Tank removal to scrap, includes trucking up to 50 Miles, Suncoast will have rights to scrap steel.	$ 0.00
❖ Power wash tanks and 3 acres of parking and dyke removal to recycle.	$87,200.00
❖ Remove productions equipment and piping to scrap and make safe Suncoast will have rights to scrap steel.	$95,600.00

Lump Sum Cost $ 204,300.00

I. Exclusions and Limitations

A. Work performed beyond the scope of work covered above will be performed on a quoted basis or if not quoted, then in accordance with our established rate schedule. Any work not covered in the rate schedule, will be performed at actual costs plus sales tax and a 15% markup.

B. The work is proposed to be contiguous. In the event all phases are not performed in one mobilization, additional mobilization charges will be added to the contract price.

II. Payment, Terms and Conditions

A. Cost: The total estimated price including tax for the work covered herein is: **$ 204,300.00**

1165 Eldridge Street
Clearwater, FL 33755

Phone: (727) 442-1190
Fax: (727) 442-9821

Suncoast Environmental Construction Group

B. Terms: Invoices are Net 30 days from the date of the invoice. A 1.5% monthly late fee will be added to the account if the invoice is unpaid after the due date.

PROPOSAL ACCEPTANCE: We the undersigned do hereby accept this proposal including the terms and conditions.

Matthew C Bale
Vice President Sales
Suncoast Environmental Construction Group, Inc.

Mr. Troy Montgomery
Safety-Kleen Systems, Inc.

1165 Eldridge Street
Clearwater, FL 33755

Phone: (727) 442-1190
Fax: (727) 442-9821

jamson
ENVIRONMENTAL
HAZARDOUS WASTE MANAGEMENT • REMEDIATION • MATERIALS PROCESSING FACILITY
11817 Elyssa Road • Thonotosassa, Florida 33592-2961
24 Hour (813) 986-3310 • Fax (813) 986-2321
www.jamsonenvironmental.com

February 14, 2012

Mr. Bob Colberg
Environmental Consulting & Technology, Inc.
1408 North Westshore Blvd., Suite 115
Tampa, Florida 33607

Dear Mr. Colberg:

Re: Used Oil Facility – Estimated Closure Costs

Thank you for the opportunity to present a proposal for closure of a used oil processing facility in Ocala, Florida. Pricing for the items outlined in your request for proposal are detailed below:

Waste Stream	Transportation and Disposal Cost
Solidified Used Oil Processing Waste, No Free Liquids (Direct Landfill)	
55 Gallon Drums	$100.00/each
20 Cubic Yard End Dump (Can Haul 22-25 Tons)	$975.00/Load (22 Tons)
20 Cubic Yard Roll-Off (Can Haul 15-18 Tons)	$1,600.00/Load (15 Tons)
Tank Sediments/Sludges (Requiring Solidification)	$2,200/Load (22 Tons) ✓ $100/ton
Petroleum Contact Water, Bulk (Can Haul 5,300 Gallons at SG of 8.34)	$.35/gallon
Industrial Wastewater, High COD, Bulk (Estimated 5,300 Gallons)	$.75/gallon (for Solidification)
Used Oil Filters	
55 Gallon Drum	$75.00/drum
20 Cubic Yard Roll-Off (Estimate 10 Tons)	$1,780/Load (for Incineration) ✓
Used Oil, Bulk or Drum Shipments	No Charge (Credit of $.35/gallon) ✓
Vacuum Truck with Operator, Straight Time, 8 Hours	$840.00/day
Environmental Technician, Straight Time	$38.00/hour

Please give me a call if I can provide any additional information.

Best regards,

P.A. Eastman

Patricia A. Eastman
President

safety-kleen.

AN EQUAL OPPORTUNITY EMPLOYER(M-F)
DUNS NO. 05-397-6551

PURCHASE ORDER NO. 750431477
This number must appear on all invoices, packages, packing slips, shipping papers and correspondence.

Date: 12/08/2011 ✓

Page 1 OF 1

From (Seller)
VEOLIA ENVIRONMENTAL SVCS NORTH AMERICA
CORP DBA VEOLIA ES TECHNICAL SOLUTIONS
2995 WETHERINGTON LANE
VALDOSTA GA 31601-1109
Phone # 229-241-8440

Vendor NO. 132006

Ship From:
BR OIL Trm Ocala,
359 Cypress Rd
Ocala FL 34472-3101
Phone # 352-687-0688
Fax # 352-687-8511

Invoice To:
Safety-Kleen Accounts Payable
P.O. Box 660203
Dallas, TX 75266-0203

Shipping Terms	Purchasing Group	Terms
	Corp. Waste Mgt.	Payable within 45 days

Item	Quantity	UOM	Part Number/Description	Unit Price	Amount	Delivery
00010	9.79	TON	810742 - Non-Haz Dir Placement	25.00 ✓	244.75	
			Total amount in USD		244.75	

SOLID WASTE MANAGEMENT AREA

PLEASE ENTER OUR ORDER FOR THE GOODS DESCRIBED ABOVE SUBJECT TO THE TERMS AND CONDITIONS STATED OR INCORPORATED HEREIN. INCLUDE PACKING SLIP IN EACH SHIPMENT.

Sales Tax Exemption #

OUR PART NO. SHOWN ABOVE MUST BE ON YOUR PACKING SLIP AND INVOICE AND CLEARLY PRINTED ON EACH INDIVIDUAL PRODUCT'S PACKAGING IN CHARACTERS NO LESS THAN 1" HIGH.

BY SIGNING THIS YOU ACKNOWLEDGE THAT SAFETY-KLEEN HAS AN ENVIRONMENTALLY PREFERRED PURCHASING POLICY AND THAT YOU WILL ENDEAVOUR TO PROVIDE GOODS AND SERVICES CONSISTENT WITH THAT POLICY.

"SAFETY-KLEEN SYSTEMS, INC. (Buyer)"
Per

ACKNOWLEDGED BY: _____ DATE: _____

Please return signed acknowledgement copy promptly

ACCEPTANCE OF THIS ORDER IS LIMITED TO THE TERMS AND CONDITIONS CONTAINED HEREIN

Millennium Laboratories Inc.
12721 Race Track Road
Tampa, FL 33626-1314
Phone: (813) 925-3871
Fax: (813) 925-3872

Quote #: QT021312-01
Project Name: Safety-Kleen

Quote Date: 02.13.12
Project Manager: Kathy Sheffield

MLI Quotation

Client Information

Federal ID #: E01-0709107

Attention: Mr. Bob Colberg
Company: Environmental Consulting & Technology
Address: 1408 N. Westshore Blvd. Suite 115
Tampa, FL 33607

Phone: 813-289-9338
Fax: 813-289-9388

PARAMETER/METHOD	TAT	MATRIX	QTY.	Unit Price	Total Price
EPA 1010 Ignitability	10 days	used oil	1	$50.00	$50.00
% Water	15 days	used oil	1	$100.00	$100.00
EPA 6010 Metals (AsCdCrPb)	10 days	used oil	1	$100.00	$100.00
Total Halogens	10 days	used oil	1	$75.00	$75.00
Total Sulfur	15 days	used oil	1	$100.00	$100.00
EPA 8082 PCB	5 days	used oil	1	$80.00	$80.00
EPA 1010 Ignitability	10 days	Waste Water	1	$50.00	$50.00
EPA 1311/6010/7470 TCLP-RCRA 8 Metals	10 days	Waste Water/Sludge	1	$160.00	$160.00
EPA 8260 - Benzene (total)	5 days	Waste Water	1	$40.00	$40.00
EPA 1311/8260 TCLP-Volatiles	10 days	Sludge	1	$160.00	$160.00
EPA 1311/8270 TCLP-Semivolatiles (BNA)	10 days	Sludge	1	$250.00	$250.00
EPA 1311/8081 TCLP-Pesticides	10 days	Sludge	1	$150.00	$150.00
EPA 1311/8321 TCLP-Herbicides	10 days	Sludge	1	$170.00	$170.00
EPA 6010/7471 RCRA 8 Metals (total)	5 days	Solid Waste	1	$90.00	$90.00
EPA 8260 - Volatile Organics	5 days	Solid Waste/Water	1	$90.00	$90.00
EPA 8270 - Semivolatiles (BNA)	10 days	Soil/Water	1	$180.00	$180.00
EPA 8270 - Low-Level PAHs	10 days	Soil/Water	1	$90.00	$90.00
FL-PRO TRPH	5 days	Solid Waste/Soil/Water	1	$60.00	$60.00
Total Organic Halides (TOX)	10 days	Solid Waste	1	$100.00	$100.00
EPA 8082 PCB	5 days	Solid Waste/Soil/Water	1	$80.00	$80.00
EPA 6010 - Metals (AsCdCrPb)	5 days	Soil/Water	1	$40.00	$40.00
pH Determination	5 days	Waste Water	1	$15.00	$15.00
				Total Cost:	$2,230.00

TERMS AND ADDITIONAL CONDITIONS:

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Except for subcontracted analyses, all analytical results will be reported to the method detection limits listed in the current MLI Precision, Accuracy, and MDL (PAM) Manual. Subcontracted analyses will be reported to the subcontractor's currently published method detection limits, where applicable.

Contact Us
Phone: 866-694-7327
Email: customer.service@liquidenviro.com
Web: www.liquidenviro.com

liquid
ENVIRONMENTAL SOLUTIONS

Invoice 986676

Bill To:
414861-031
SAFETY KLEEN ACCOUNTS PAYABLE
ATTN: AP
PO BOX 660203
DALLAS, TX 75266-0203

Service Location:
414861-031
SAFETY KLEEN

359 CYPRESS ROAD
OCALA, FL 34472-3101

November 30, 2011

Service Ticket

Item	Quantity	UoM	Description	Unit Value	Total
974793	11/23/11	PO# 750429411			
1	5885.00	GALLONS	P#810752 TOTAL GALLONS Mnfest# 20346	0.12000	706.20
2		EACH	OTHER Mnfest# WK#120703	0.00000	0.00
				SubTotal:	706.20
				Total:	706.20

Comments

Thank you for your business.

Current	*30 Days*	*60 Days*	*90 Days*
706.20	0.00	0.00	0.00

PETROLEUM CONTACT WATER/WASHWATER/OILY WATER

Detach and remit bottom portion with payment

Remit to Address (Payments Only):
Accounts Receivable
Liquid Environmental Solutions of Florida, LLC
PO BOX 671724
DALLAS TX 75267 - 1724

Customer No.	414861
Terms	DUE UPON RECEIPT
Invoice	986676
Date	11/30/11
Amount	706.20

YOU MAY NOW PAY YOUR INVOICE ONLINE AT WWW.LIQUIDENVIRO.COM

To pay using a credit card please complete the section below and return by mail or FAX TO 214-524-6159 attention Accounts Receivable

Name on Card: _____ Billing Zip Code: _____

Card No.: _____ ExpirationDate: _____

Signature: _____ CVV #: _____
(last 3 digits on back of card)

ATTACHMENT J

EMPLOYEE TRAINING

USED OIL TRANSPORTER STAFF TRAINING -FLORIDA

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

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

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

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

Safety-Kleen Facilities Used Oil Transporter Training - Florida

Federal Used Oil Regulations: 40 CFR Part 279

USED OIL = any oil that has been refined from crude oil, or any synthetic oil, that has been used and as a result of such use is contaminated by physical or chemical impurities

USED OIL TRANSPORTER = any person who transports used oil, any person who collects used oil from more than one generator and transports the collected oil, and owners and operators of used oil transfer facilities. Uses oil transporters may consolidate or aggregate loads of used oil for purposes of transportation but, with the following exception, may not process used oil. Transporters may conduct incidental processing operations that occur in the normal course of transportation (e.g., settling and water separation), but that are not designed to produce (or make more amenable for production of) used oil derived products or used oil fuel.

40 CFR 279 Subpart E-Standards for Used Oil Transporters/Transfer Facilities

279.40 – Applicability

- **Applies to all used oil transporters except;**
- **On-site transporters, generators who transport shipments of used oil totaling 55 gal. or less from the generator to a used oil collection center, generators who transport shipments of used oil totaling 55 gal. or less from the generator to a used oil aggregation point owned or operated by the same generator, or transportation of used oil from household DIY's to a regulated used oil generator, collection center, aggregation point, processor/re-refiner, or burner subject to the requirements of this part**
- **Does apply to transportation of collected household DIY's used oil from regulated used oil generators, collection centers, aggregation points, or other facilities where household DIY's used oil is collected**

40 CFR 279 Subpart E Continued

279.41 – Restrictions on transporters who are not also processors/re-refiners

- **Used oil transporters may consolidate or aggregate loads of used oil for purposes of transportation. However, may not process used oil unless they also comply with subpart F – processors/re-refiners.**
- **Transporters may conduct incidental processing operations that occur in the normal course of used oil transportation (settling & water separation), but that are not designed to produce (or make more amenable for production of) used oil derived products unless they also comply with the requirements in subpart F**
- **Transporters of used oil that is removed from oil bearing electrical transformers and turbines and filtered by the transporter or at a transfer facility prior to being returned to its original use are not subject to the processor/re-refiner requirements in subpart F**

40 CFR 279 Subpart E Continued

279.42 – Notification

- **Used Oil transporters must have an EPA ID number**

279.43 – Used Oil Transportation

- **Used oil transporters must deliver all used oil received to: another used oil transporter, used oil processing/re-refining facility, an off-specification used oil burner facility, or an on-specification used oil burner facility**
- **Used oil transporters must comply with all applicable requirements under the USDOT regulations in 49 CFR Parts 171 – 180**
- **In the event of a discharge of used oil during transportation, the transporter must take appropriate action to protect human health and the environment (e.g., notify local authorities, and dike the discharge area)**

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40 CFR 279 Subpart E Continued

279.43 – continued

- An air, rail, highway, or water transporter who has discharged used oil must: give notice, if required by 49 CFR 171.15 to the National Response Center (800-424-8802 or 202-426-2675; and
- Report in writing to the Director, Office of Hazardous Materials Regulations, Materials Transportation Bureau, DOT, Washington, DC
- A transporter must clean up any used oil discharged that occurs during transportation or take such action as may be required or approved by federal, state, or local officials so that the discharge no longer present a hazard to human health or the environment

40 CFR 279 Subpart E Continued

279.44 – Rebuttable presumption for used oil

- **To ensure the used oil is not a hazardous waste the used oil transporter must determine whether the total halogen content of used oil being transported or stored at a transfer facility is above or below 1,000 ppm**
- **Transporter must make this determination by; testing the used oil, or applying knowledge of the halogen content of the used oil in light of the materials or processes used**
- **If the used oil contains greater than or equal to 1,000 ppm total halogens, it is presumed to be a hazardous waste**
- **The owner or operator may rebut the presumption by demonstrating the used oil does not contain hazardous waste by using an analytical method from SW-846**

safety-kleen.

40 CFR 279 Subpart E Continued

279.44 – continued

- Rebuttable presumption does not apply to metalworking oils/fluids containing chlorinated paraffins, if they are processed, through a tolling arrangement as described in 279.24(e), to reclaim metalworking oils/fluids. The presumption does apply to metalworking oils/fluids if such oils/fluids are recycled in any other manner, or disposed
- Rebuttable presumption does not apply to used oils contaminated with chlorofluorocarbons (CFCs) removed from refrigeration units if the CFCs are destined for reclamation. Rebuttable presumption does apply to used oils contaminated with CFCs that have been mixed with used oil from sources other than refrigeration units
- Records of analyses conducted or information used to comply with the above must be maintained by the transporter for at least 3 years

40 CFR 279 Subpart E Continued

279.45 – Used oil storage at transfer facilities

- Used oil transporters are subject to all applicable Spill Prevention, Control and Countermeasures (40 CFR Part 112)
- Used oil transfer facilities = shipments of used oil are held for more than 24 hours during the normal course of transportation and not longer than 35 days
- Must store used oil in units, tanks, or containers subject to regulation under 40 CFR parts 264 & 265
- Containers used to store used oil must be: in good condition (no severe rusting, apparent structural defects or deterioration and not leaking
- Containers must be equipped with a secondary containment system consisting of, at a minimum: dikes, berms or retaining walls; and a floor convering the entire area; or an equivalent secondary containment system

40 CFR 279 Subpart E Continued

279.45 – continued

- **The entire containment system must be sufficiently impervious to used oil**
- **Aboveground tanks used to store used oil at transfer facilities must be equipped with a secondary containment system meeting the above requirements**
- **Containers and aboveground tanks used to store used oil must be labeled clearly with the words "Used Oil"**
- **Upon detection of a release of used oil the owner/operator must perform the following cleanup steps: stop the release; contain the released used oil; clean up an manage the used oil and other materials properly; if necessary, repair or replace any leaking used oil storage container or tanks prior to returning them to service**

40 CFR 279 Subpart E Continued

279.46 – Tracking

- Used oil transporters must keep a record of each used oil shipment accepted that includes:
- Name, address of generator, transporter, or processor/re-refiner who provided the used oil for transport
- EPA ID number (if applicable) of the generator, transporter, or processor/re-refiner who provided the used oil for transport
- Quantity of used oil accepted
- Date of acceptance; and signature, dated upon receipt of the used oil, of a representative of the generator, transporter, or processor/re-refiner who provided the used oil for transport

40 CFR 279 Subpart E Continued

279.46 – continued

- Used oil transporters must keep a record of each shipment of used oil that is delivered to another transporter, used oil burner, processor/re-refiner, or disposal facility. Records must include:
- Name and address of the receiving facility or transporter
- EPA ID number of transporter or receiving facilty
- Quantity of used oil delivered
- Date of delivery; and signature, dated upon receipt of the used oil, of a representative of the receiving facility or transporter
- Records must be maintained for at least 3 years

Florida Used Oil Regulations: Chapter 62-710 F.A.C.

Chapter 62-701.300(8)(b) – no person shall dispose of used oil in a landfill, except as provided in Chapter 62-710 FAC
Chapter 62-701.300(11)(a) - no person may mix or comingle used oil with solid waste that is to be disposed of in landfills or directly dispose of used oil in landfills
(11)(b) – oily wastes, sorbents or other materials used for maintenance or to clean up or contain leaks, spills or accidental releases and soils contaminated with used oil as a result of spills or accidental releases are not subject to the above
Used Oil = any oil which has been refined from crude oil or synthetic oil and, As a result of use, storage, or handling, has become contaminated and Unsuitable for its original purpose due to the presence of physical or chemical Impurities or loss of original properties
Oily wastes = those materials which are mixed with used oil and have become Separated from that used oil. Oily waste also means materials, including Wastewaters, centrifuge solids, filter residues or sludges, bottom sediments, Tank bottoms, and sorbents which have come into contact with, and have been Contaminated by, used oil

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Chapter 62-710 FAC

62-710.300 – Applicability

- **used oil transporters and transfer facilities shall comply with 40 CFR part 279 Subpart E and meet the registration, recordkeeping, and certification requirements found in 62-710.500 and 62-710.510**

62-710.400 – Prohibitions

- **no person may collect, transport, store, recycle, use, or dispose of used oil, filters or oily wastes except as authorized in this chapter or in Chapter 403, F.S.**
- **no person may discharge used oil into soils, sewers, drainage systems septic tanks, surface or ground waters, watercourses, or marine waters**
- **no person may mix or comingle used oil with hazardous substances that make it unsuitable for recycling or beneficial use with the exception of provisions found in 40 CFR 279.10(b)(3) – CESQG mixtures**

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Chapter 62-710

62-710.400 – continued

- **Used oil tanks or containers not stored inside a structure shall be closed, covered or otherwise protected from the weather. Tanks that are not double-walled should be stored on an oil-impermeable surface and must have secondary containment with the capacity to hold 110% of the volume of the largest tank or container within the containment area**

62-710.500 – Registration and Notification

- **Used oil transporters and transfer facilities must register annually with the Florida Department of Environmental Protection (FDEP)**

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Chapter 62-710 Continued

62-710.510 – Record Keeping and Reporting

- each registered person shall maintain records that include: name, business address, telephone number and EPA ID number of the transporter; source of the used oil – name, street address, and EPA ID number if the generator has one; total number of gal. received from each source; type of used oil received; date of receipt; destination of end use of used oil and oily wastes; and documentation of halogen screening
- transporters shall maintain records of all shipments of used oil, including those accepted for transport as well as those refused due to suspected mixing with hazardous waste – a copy of this record shall be left with the generator
- records shall be retained for a period of 3 years
- submit an annual report on March 1st for the preceeding year

Chapter 62-710 Continued

62-710.600 – Certification Program for Used Oil Transporters

- **Transporters that transport over public highways more than 500 gal. of used oil annually shall certified by the FDEP**
- **Used oil transporters shall: register annually and comply with record keeping and reporting requirements; submit a training program for approval to the FDEP showing compliance with state and federal rules governing used oil; proper used oil management practices, including appropriate response action to any release or spill; detailed description of the company's SOP for halogen screening at each pick up location; introduction of each new employee to the applicable laws and rules before unsupervised driving of a used oil transportation vehicle; and documentation that all company personnel handling or transporting used oil have successfully completed the training – no later than 90 days after beginning employment**

Chapter 62-710 Continued

62-710.600 – continued

- **Maintain a record of training in the company's operating record and the individual personnel files indicating the type of training received along with the dated signature of those receiving training and providing the training**
- **Have, verify, and maintain vehicle insurance with a combined single limit of no less than $1,000,000**

62-710.850 – Management of used oil filters

- **Landfill disposal of used oil filters is prohibited in Florida**
- **Transporters, transfer facilities must register with the FDEP**
- **Containers must be labeled "Used Oil Filters" and in good condition (no severe rusting, apparent structural defects or deterioration) with no visible leaking**

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Chapter 62-710 Continued

62-710.850 – continued

- **containers shall be sealed or otherwise protected from weather and stored on an oil-impermeable surface**
- **upon detection of a release from any used oil filter container the facility must: stop the release; contain the released oil; clean up and manage properly the released oil and any oily waste in accordance with Chapter 770, FAC; and repair or replace any leaking used oil filter storage containers prior to returning them to service**

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Chapter 403 Florida Statutes

403.121 – FDEP may recover damages for any injury to the air, waters, or property of the State and may impose a $10,000 penalty for each offense (each day of violation is a separate offense)

403.141 – anyone who pollutes may held jointly and severally liable (from the generator through the final destination facility can be held liable for the pollution

403.161 – it is a violation of state law to cause pollution, fail to comply with any laws or rules, make false statements regarding these laws and rules or fail to report discharges. There are 3 types of violations:

- **willfully polluting – 3rd degree felony punishable by $50,000 and/or 5 years imprisonment for each offense**
- **anyone who pollutes due to reckless indifference or gross careless disregard – 2nd degree misdemeanor punishable by $5,000 and/or 60 days in jail for each offense**
- **anyone who fails to comply with any laws or rules is guilty of 1st degree misdemeanor, punishable by $10,000 and/or 60 months in jail**

Chapter 403, F.S. Continued

403.708 – no person shall deposit any solid waste in or on the land or waters located within the state except in a manner approved by the Department

No person shall dispose of used oil in landfills

403.751 – no person may manage used oil in any manner which endangers public health or welfare:

- No person may discharge used oil into any storm drain, sewer, septic tank, or body of water
- No person may mix used oil with solid waste that is to be disposed of in a landfill
- No person may mix used oil with a hazardous substance
- Used oil shall not be used for road oiling, dust control, weed abatement

403.7545 - shall prohibit the department from regulating used oil in a manner consistent with the United States Environmental Protection Agency, or as a hazardous waste in a manner consistent with s. 241 of the Hazardous and Solid Waste Amendments of 1984