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ACTION
resources
Hazardous & Special Waste Transportation

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Hanceville, AL 35077
www.action-resources.com

March 15, 2012

Ms. Janet Ashwood
Florida Department of Environmental Protection
Waste Management Div. – HWRS, MS4560
2600 Blair Stone Rd.
Tallahassee, FL 32399-2400

Dear Ms. Ashwood,

This letter is to confirm that the Used Oil Training Manual you have, and the enclosed copy, is the current version and is still in use. No changes have been to this manual since its' last submission to Florida DEP.

If I may provide you with additional information or be of further assistance in this matter, please don't hesitate to contact me.

Sincerely,



Douglas R. Carothers
Manager, EH&S Compliance Programs

Received

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BSHW

Action Resources, Inc.

Used Oil Transportation Training

Action Resources, Inc. transports used oil from Used Oil Processors, Used Oil Transfer Facilities and, on occasion Used Oil Generators. All of these entities are bound by State and Federal Regulations to perform their activities according to strict guidelines to prevent spills or releases of used oil into the environment, to maintain analytical and operational records for the used oil they accept and send off-site, and to comply with training requirements to inform their workers about the necessity to follow certain written procedures to achieve all of the above.

Definitions:

“Used oil” means 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” means those materials which are mixed with used oil and have become separated from that used oil. Oily wastes 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.

“Used oil generator” is any person, by site, whose act or process produces used oil or whose act first causes the used oil to be regulated. Generators subject to the used oil regulations include, but are not limited to, businesses, governments, schools, and equipment maintenance facilities

“Used oil transporter” means any person who transports used oil over public highways in shipments of greater than 55 gallons at one time.

“Processor” means any person processing used oil. The term also includes any transfer facility that stores used oil for longer than 35 days at a time, any used oil marketer who receives used oil from transporters or who has at least 25,000 gallons of used oil storage capacity, and any person who blends used oil with on-specification used oil fuel or with virgin petroleum products for the purpose of producing on-specification used oil fuel.

Action Resources, Inc. is a Used Oil Transporter. The purpose of this training program is to inform our personnel of our requirements under the Used Oil Regulations as specified by the US EPA, in 40 CFR Part 279 and various State requirements that are as, or more stringent than the Federal Regulations.

Our **primary responsibility** is to make sure that the used oil we are loading onto our tank trucks;

- Does not spill while loading
- Does not spill in transit
- Does not spill while unloading
- Is only picked up from properly licensed entities (those who have registered with EPA)

- Is only delivered to properly licensed facilities.
- To immediately clean up any oil spilled during these activities
- To immediately report any spilled material to Emergency Management Authorities and State Regulatory Agencies.

Additionally we must ensure that any used oil we pick up has been properly tested to ensure that it is not "Hazardous Waste: because of certain chemical characteristics, or that it hasn't been mixed with certain hazardous waste containing harmful "halogenated" solvents or oils. "Halogenated" compounds are those materials that contain Fluorine, Chlorine, Bromine and, rarely, Astatine.

We will achieve these responsibilities by adhering to the following procedures:

Verify EPA Facility ID Numbers:

Shippers will prepare a Used Oil Manifest or Hazardous Material Bill Of Lading. Before connecting any hoses to the transport vehicle or accepting any Used Oil, verify the shipper has entered their US EPA ID Number on the shipping document. If the shipper or receiver cannot produce an EPA ID Number call your dispatcher and await instructions. When delivering Used Oil, only deliver to the Facility listed as the consignee on the Used Oil Manifest or Hazardous Material Bill of Lading.

Loading, Unloading, and Transit:

- a. Truck may be parked for offloading in an unprotected area, an area with no containment slab. If a tanker is overfilled, a hose comes loose or bursts or another spill occurs on the loading/offloading slab, the material being handled can cause an immediate ground and surface water contamination.
- b. Flammable liquids and vapors are subject to ignition, which can cause fire or explosion.
- c. Combustible liquids can also be ignited, causing a fire.
- d. Employees must be aware of exposure hazards when coming in contact with petroleum liquids by reading the MSDS for the material and complying with Personal Protective Equipment (PPE) requirements and procedures.

Sampling and Analysis Vacuum/Pump/Tanker Truck

1. The Shipper will need to take a composite sample from each batch of the used oil that has been collected and is being offered for transport.
2. Composite sampling should be performed using the top to bottom sampling method that consists of a small pipe with a check valve on the end.
3. The sample should be labeled and the Date, Truck Report and Tanker Compartment Number should be marked on the label.

4. For used oil related products, a Dexsil Q4000 kit test or equivalent method will be performed prior to loading to ensure that all product to be offloaded is <1,000 ppm Total Organic Halogens.
5. For quality control, retained samples will be held on-site until offloaded product is transferred to the receiving facility

Set up Vacuum/Pump/Tanker Truck for unloading.

(Note: Transfer operations are to only be performed by reliable persons properly instructed in unloading hazardous materials and made responsible for careful compliance with this procedure.)

1. Overfill protection will be gauged by operator loading truck. It will be checked per event loading.
2. Make sure the grounding wire is attached to the Vacuum/Pump/Tanker Truck.
3. Verify truck brakes are engaged and set emergency brake on truck transfers.
4. Put on the proper personal protective equipment (e.g., safety glasses, gloves, and respirator).
5. Put a drip bucket under the Vacuum/Pump/Tanker Truck discharge valve and under Storage Tank unloading valve to catch any drips or small spills.
6. Slowly remove the cap or plug from the Vacuum/Pump/Tanker Truck valve. The Vacuum/Pump/Tanker Truck discharge line may be pressurized. Be prepared to catch any fluid that may run out. Unlock one camlock and allow pressure to discharge before unlocking second camlock.
7. Remove the cap or plug from the Vacuum/Pump/Tanker valve. Connect an appropriate hose adapter to the tanker valve, if required.
8. Check for gasket serviceability, and then connect the flexible hose to the Vacuum/Pump/Tanker Truck discharge valve, and secure cam locks. Make sure the flexible hose is securely fastened to the storage tank.
9. Make sure all non-discharge valves are secure in the closed position.

Vacuum/Pump/Tanker Unload.

1. Engage Vacuum/Pump/Tanker Truck PTO.
2. Slowly open the pump discharge valve on Truck until the maximum output is reached. The pump pressure gauge should read a steady pressure indicating that the fluid is flowing properly.
3. Check the hose, connectors, pumps, transfer line and tank manifold for leaks.
4. Monitor the transfer. Periodically check for adequate tank space and possible spillage around truck and in Storage Tank Containment.

5. Make sure all product is pumped out of compartment being pumped and air is displaced in Truck lines and Storage Tank manifold. Once Vacuum/Pump/Tanker Truck is empty close the 3" valve on Storage Tank, Close Truck pump discharge valve and disengage PTO.
6. Disconnect Truck hose from Storage Tank and address any leaks/drips with absorbent pads.
7. Disengage grounding line from Vacuum/Pump/Tanker Truck.
8. Read and record ending levels of the Storage Tanks in Tank Tracking Report.
9. Any accumulated oily absorbent materials or debris from filtration will be stored in marked 55-gallon drum located on Shippers unloading slab.

Storage Tank to Vacuum/Pump/Tanker Truck Transfer Procedure

Set up the Vacuum/Pump/Tanker Truck for loading.

NOTE: When loading a tanker a material handler must stay on top until the loading process is complete. Need to periodically check headspace in tanker to ensure that it is not overfilled.

1. Make sure the grounding wire is attached to the Vacuum/Pump/Tanker Truck.
2. Verify truck brakes are engaged and set emergency brake on truck transfers.
3. Put on the proper personal protective equipment (e.g., safety glasses, gloves, and respirator).
4. Put a drip bucket under the Vacuum/Pump/Tanker Truck discharge valve to catch any drips or small spills.
5. Slowly remove the cap or plug from the Vacuum/Pump/Tanker Truck valve. The Vacuum/Pump/Tanker Truck discharge line may be pressurized. Be prepared to catch any fluid that may run out. Unlock one camlock and allow pressure to discharge before unlocking second camlock.
6. Remove the cap or plug from the Vacuum/Pump/Tanker valve. Connect an appropriate hose adapter to the railcar/tanker valve, if required.
7. Check for gasket serviceability, and then connect the flexible hose to the Vacuum/Pump/Tanker Truck discharge valve, and secure cam locks. Make sure the flexible hose is securely fastened to the storage tank.
8. Make sure all non-discharge valves are secure in the closed position.

3.3.2 Set up the storage tank.

1. Record the start time and the initial level readings (nearest ¼" increment) of the storage tank and the Vacuum/Pump/Tanker Truck levels on the Tank Tracking Report. Take the tank level reading from the level indicators located on the tank. Take the Vacuum/Pump/Tanker reading from the stick level measurement.
2. Connect flex hose from the tank to the Vacuum/Pump/Tanker Truck . Make sure hose connection is secure.
3. Open the valve on the 3" valve on the discharge/loading line. This will keep the pump from deadheading once turned on.
4. Depending on which loading pump is utilized, align the unloading manifold valves from the tanker to the designated storage tank.

3.3.3 Vacuum/Pump/Tanker Loading.

1. Start the loading pump.
2. Open ball valve on pump discharge.
3. Slowly open the pump discharge valve until the maximum output is reached. The pump pressure gauge should read a steady pressure indicating that the fluid is flowing properly.
4. Check the hose, connectors, and transfer line for leaks.
5. Monitor the transfer. Periodically check for adequate tank space.

In the event of a spill or Release of Used Oil:

Not every dribble or drip of used oil is reportable to State or Federal Regulatory Agencies.
Every dribble or drip of Used Oil that comes into Contact with the ground or water is Reportable to Action Resources, Inc.'s Safety Department!

Non-Reportable Spill

A non-reportable spill is one in which a hazardous material does not escape to the environment (get offsite of the facility) and:

- 1) *The material will not pose a health risk to an individual in the immediate area.*
- 2) *The spill can be controlled and contained with on-hand spill response materials.*
- 3) *The properties of the material are well known to the person(s) controlling and containing the spill.*
- 4) *The person(s) controlling and containing the spill have had appropriate training.*
- 5) *Control and containment of the spill requires less than a half-hour for two people and is less than 25 gallons.*

These spills **will** be reported to your Terminal Manager and Action Resources, Inc.'s Manager of Environmental Safety & Health Compliance Programs.

Reportable Spills

*A Reportable Spill for oil is any **actual** or **threatened** release of a hazardous material that enters the environment. Examples of a Reportable Spill quantity that stay on Facility property include:*

- 1) A spill enters a storm drain or ditch. Sheen of oil on the water is a reportable quantity.*
- 2) A spill enters the sanitary sewer greater than 25 gallons.*
- 3) A spill contacts soil of a quantity greater than 25 gallons.*
- 4) A spill contacts asphalt or concrete greater than 25 gallons.*
- 5) A spill into secondary containment is greater than 25 gallons..*

Remember!!!!

Even though a small contained spill **may** not be reportable to State or Federal Agencies, they **will** be reported to your Terminal Manager and to Action Resources, Inc.'s Manager of Environmental Safety & Health.

In the event of **Reportable Spill**, driver will immediately execute Action Resources, Inc.'s Contingency Plan. (Attachment A.)

The first notification will be to Local Emergency Authorities via **911**. The second notification will be to the Emergency Coordinator of the facility that dispatched your load. See Attachment A.

In the unlikely event that the driver cannot contact either one of the Emergency Coordinators for the Facility that dispatched the load, the driver will notify the Company's Manager of Environmental Safety and Health Compliance Programs. See Attachment A.

If all contact attempts fail with in the first three attempts, the driver will call the Emergency Response Telephone Number for XL Insurance **OnCall** Emergency Response **800-823-7351**.

Attachment

“A”

Action Resources, Inc.

Contingency Plan

Reporting Procedures-In the event of a hazardous material/waste spill or incident the driver shall:

1. Secure the area making sure that all pedestrians and vehicles stay away from the area.
2. Notify local fire and police department. If telephone number is not readily available dial 911.
3. After police and fire department have been notified or arrived and have secured the scene, the driver shall notify the following company emergency response coordinators, in order, depending on the location dispatching the driver;

Hanceville, AL

1st Kathy Anderson
Office: 256.352.7061
Cell: 256.338.8336

2nd Doug Carothers
Office: 256.352.7082
Cell: 256.338.8363

Cordele, GA

1st Mike Guest
Office: 229.273.7935
Cell: 229.805.1722

2nd Jerry Busby
Office: 251.443.6801 x4
Cell: 251.455.2213

Theodore, AL

1st Gerald Nelson
Office: 251.443.6801 x7
Cell: 251.895.0565

2nd Jerry Busby
Office: 251.443.6801x4
Cell: 251.455.2213

Forrest Park, GA

1st Robert Woodson
Office: 678.551.3735
Cell: 678.551.3537

2nd Jerry Busby
Office: 251.443.6801 x4
Cell: 251.455.2213

La Porte, TX

1st Calvin Lewis
Office: 281.909.8080
Cell: 281.904.7870

2nd Theresa Posey
Office: 281.909.8081
Cell: 281.714.8373

Gadsden, AL

1st Conrad Vaughn
Office: 256.549.8240
Cell: 256.338.8352

2nd Kathy Anderson
Office: 256.352.7061
Cell: 256.338.8336

Corporate (if unable to reach Branch Mgr. or 2nd ;) **800.228.8845**

Doug Carothers Office: 256.352.7082 Cell: 256.338.8363

The Action Resources, Inc. Manager receiving this call **will assume ownership** of the incident on behalf of Action Resources, Inc. This individual will be responsible for coordinating response efforts, maintaining communications with the driver and responders and plant personnel until the incident has been mitigated. If the driver is unable to contact one of the above listed persons, the driver shall call XL Insurance OnCall as described in Appendix A.

4. The driver should have the following information available to give the emergency response coordinator:
 - a) Name of person reporting accident or incident.
 - b) Name, address, EPA number of transporter.
 - c) Phone where the person reporting accident can be reached.
 - d) Date, time and location of accident.
 - e) Mode of transportation and vehicle type.
 - f) Brief description of incident, including type of incident.
 - g) Name and EPA number of Shipper/Generator, and the Consignee.

- h) Shipping Name, Hazard Class, UN or NA number of waste.
 - i) Estimated quantity spilled.
 - j) Extent of land, water, or air contamination.
 - k) Shipping name, hazard class, UN or NA number or any other materials being transported.
5. The Action Resources, Inc. Emergency Coordinator will record the information provided by the driver and dispatch Emergency Responders as necessary. A list of locally approved Emergency Responders will be maintained as an Addendum to this Plan. If the Emergency Responders on this list cannot be dispatched, the Action Resources, Inc. will defer to our Insurance Company XL Insurance to dispatch Emergency Responders to the scene. XL Insurance maintains a Nation-Wide list of Emergency Contractors that they have approved for response to various emergencies.
6. The Action Resources Emergency Coordinator will notify the following agencies as required:
- a) National Response center 800/424-8802 or 202/267-2675
 - b) CHEMTREC 800/424-9300(USA) if specified by shipper on shipping documents
 - c) Hazardous Materials/ Waste Incidents 800/843-0699
 - d) Shipper as listed on Shipping Papers
 - e) U.S. Coast Guard, Mobile 334/639-6117
 - f) Alabama Department of Public Safety 334/242-4371 (if in Alabama)
 - g) Alabama Department of Environmental Management 334/271-7700 (if in AL)
 - h) Delaware DNREC 800/882-6602 in State, 302/739-5072 out of state (originating in DE)
 - i) **Florida State Warning Point ((850) 413-9911 or (800) 320-0519**
 - j) Texas Department of Health Services (asbestos) 512/834-6600
 - k) Texas Commission for Environmental Quality 800/832-8224
 - l) Texas Department of Transportation 512/465-3000
 - m) Texas OSHA 512/374-0271.

Containment After notifying local fire and / or police departments and proper company personnel, the driver should make an attempt to contain the spilled waste to the best of their ability.

PPE *Before attempting to contain or clean up any spilled material, the Driver shall don proper personal protective equipment for the substance in question. If the Driver lacks the personal protective equipment necessary to safely handle the spilled material, he shall not attempt cleanup and will wait for the Emergency Responders. (For instance, if a material requires supplied-air respirators, or Level-A outer garments, the driver will not be able to respond.)*

1. Use any available resource to contain the spill by constructing a temporary barrier. Use absorbent pads or booms carried in the vehicles where practical. If the spill is too large to be contained by absorbent materials, use dirt or any other available materials to construct the temporary barrier. The driver should make every attempt to prevent the spilled waste from spreading.
2. If the source of the spill is from a drummed waste the driver should plug or tape the leaking drum. If necessary the driver should turn the leaking drum upside down.

3. Based upon the Proper Shipping description (refer to the manifest) find the materials name in your Emergency Response Guidebook in the blue pages and turn to the corresponding guide number (orange pages of book).
4. If the shipping description is Generic, (i.e. NOS) check the placard on the vehicle for a "UN" or "NA" number, look up the number in the yellow pages and refer to the corresponding Guide Number in the Orange pages, or contact the shipper for safety data.

Cleanup-

Having contained the spill, cleanup is the next step. Drivers will cooperate with the cleanup company to help decontaminate the area.

1. A commercial absorbent such as oil dry, corncob, fly-ash or other compatible inert material will be used to absorb as much of the spilled material as possible. If the spillage has reached earth, all contaminated material will be collected into drums or roll-off boxes for disposal at an EPA approved site.
2. The spill area will be sampled and analyzed by a qualified laboratory. Sampling techniques, chain-of-custody requirements and analytical methods will follow approved procedures such as those outlined in SW-846. Any soil exhibiting contamination above the background level will be removed to an appropriate permitted disposal site. Recovery drums will be used to contain damaged drums.

Follow-up Procedures-

Once the immediate emergency aspects of the spill have been taken care of the following steps will be performed.

1. **Decontamination-** A tractor or trailer exposed to a spill or leak will be decontaminated at the site in order to prevent any further release so that the vehicle can be transported (or move under its own power) to an authorized facility capable of further decontamination if necessary.

Equipment will be decontaminated in the following manner: Each item will be placed in an open head container and rinsed thoroughly with a compatible solvent or cleaning compound. The residue or wash water will then be drained of in accordance with Federal and State Regulations at an authorized disposal site.

Contaminated clothing will be placed with the clean up residue and disposed of in accordance with Federal and State Regulations at an authorized disposal site. If clothing is reusable, then it will be decontaminated properly and the residue added to the other waste.
2. **Notification-** The Department of Transportation, Director of Hazardous Materials Registration, Materials and Transportation Bureau of Washington, DC 20590 will be notified, in writing, of the occurrence and nature of the incident and a copy will be submitted to the Alabama Department of Environmental

Management, 1751 Federal Drive, Montgomery, AL. 36130.

Qualified Emergency Response Contractors:

See attached list for emergency response contractors. (Exhibit A)

Emergency Equipment: Each tractor carries the following emergency equipment:

Gloves, safety glasses, hard-hat, protective clothing, respirator, absorbent pads or booms, DOT Emergency Response Guidebook, ABC fire extinguisher, emergency reflective triangles.

Safety equipment is checked and maintained as part of the Drivers pre-trip inspection to insure availability in time of emergency. After an emergency, all equipment is either decontaminated for future use or discarded with the load.

Training Program

The training familiarizes the driver with the types of material hauled by Action Resources and the corresponding safety and / or health hazards involved. Pursuant to that information, instruction is given in proper use of personal safety equipment and the types of safety equipment to be used with each particular material or waste.

Spill prevention is stressed through the use of safe driving habits and, in the case of dump trailer operation, use of rubber gasket tailgate seals and lock-down safety bolts. Use of emergency equipment is explained and demonstrated to stress protection of the employee through the use of personal safety gear, as well as protection of the public and the environment.

Appendix A

Emergency Responders

XL Insurance 800-823-7351

1. APPROACH THE SCENE
CAUTIOUSLY!
Do not rush in to assist or take any action beyond your level of training. Calling for help is often the only appropriate course of action.

2. IDENTIFY THE HAZARDS
Consult placards, MSDS's, etc. If limited information is available, err on the side of caution.

3. SECURE THE AREA
Keep untrained individuals and the general public away from the area. Keep others from smoking and/or driving through the spill area.

4. OBTAIN HELP
Contact local emergency response organizations

(911, local fire department, etc.), then contact XL's
OnCall service at:
800-823-7351
for Pollution Events, Releases, Spills and Claims Adjusting

Be prepared to provide as much of the following information as possible:
– Your name and call-back number
– Exact location and nature of the problem
– Name(s) and amount(s) of material(s) involved
– Weather conditions
– Location of surface water/storm drains
– Names and affiliations of officials at the scene
Upon receipt of this information, ONCALL will:

- Establish contact with local responders and devise an appropriate response strategy
- Dispatch an appropriate local spill response contractor, if necessary
- Ensure all state and federal environmental regulatory notifications are completed
- Oversee the efforts of the contractor at the scene
- Ensure the cleanup is cost-effective and to the satisfaction of regulatory authorities
- Ensure disposal is prompt, cost-effective and complies with applicable regulations

- Audit all public and private invoicing generated in the matter
- OnCall is a service of XL Specialty Claims, a division of the XL Insurance companies. "XL Insurance" is a registered trademark of XL Capital Ltd. XL Insurance is the global brand used by member insurers of the XL Capital Ltd group of companies. Policies are issued in the US through Greenwich Insurance Company and Indian Harbor Insurance Company, and in Canada through XL Insurance Company Limited – Canadian Branch. Coverages not available in all jurisdictions.*

***NOTE**

Once the spill or release has been mitigated, detailed incident reports containing all of the information outlined in Sections 1. through 6. of pages one and two, plus the names and telephone number of the Response Company, the names and telephone numbers of the Shipper, Receiver, Consignee, Action Resources, Inc personnel involved, make, model and equipment numbers of equipment involved, probable causes, along with detailed reports of injuries, contamination, etc. will be forwarded to Action Resources, Inc.'s Safety Department; **Attn: Douglas R. Carothers** for Root Cause Analysis, and corrective measures.

All Action Resources, Inc. Drivers will maintain a copy of this document as Page 1 of their Permit Books.

All persons listed on page 1 as Emergency Response Coordinators will maintain a copy of this document in their office and in their personal vehicles. Additionally, the Vice President / General Manager, and the Vice President of Safety and Health will maintain a copy of this document in their respective offices and personal vehicles.