Brock, Lindsay

From: Gibbs, Ana
Sent: Monday, March 25, 2013 5:15 PM
To: Brock, Lindsay; Langford, Mark
Cc: Pelz, Susan
Subject: Aqua Clean

Good Afternoon Lindsay and Mark,

Susan will discuss this information with you further. Below is an address you will need for tomorrow.
As always, thank you for your assistance.

Daniel Cullen
4023 Whistlewood Circle
Lakeland, Fl 33811

Best Regards,

Ana Gibbs
External Affairs Manager
Florida Department of Environmental Protection
13051 N. Telecom Parkway
Temple Terrace, FL 33637-0926
(813) 632-7600 Ext. 475
(813) 632-7665 Fax
email: ana.gibbs@dep.state.fl.us

-----Original Message-----
From: Daniel Cullen [mailto:danielcullen@gmail.com]
Sent: Monday, March 25, 2013 2:47 PM
To: Gibbs, Ana
Subject: Aqua Clean

Ana,
We are being pounded by Aqua Clean since late Sunday evening without out any let up.We have the smell of burning tires in our home and we have every exhaust fan in operation but they offer little help.I'm sure we will have to leave our home again since my wife and I are both ill.
Dan Cullen

Sent from my iPhone

Brock, Lindsay

From: Daniel Cullen [danielcullen@gmail.com]
Sent: Tuesday, March 26, 2013 12:56 PM
To: Brock, Lindsay
Subject: Thanks

Lindsay,
Thanks so much for your visit today.I think you now have a better understanding of our concerns and fears for our health and quality of life.It was a pleasure to talk with you and Mark today and we look forward to your help.
Respectfully,
Dan Cullen

Sent from my iPhone

Aqua Clean

5/13/13

Metal subcategory wastewaters — oil, organic subcategory are OK] City of Lakeview permit

Centralized Waste Treatment

what gets dumped directly on the pad?

used oil ⇒ only what gets into FRS tanks

NANCY draft comments about:

AOC – solidification pad cracks

AOC – acceptance of non oily waste directly on pad

comment – door on-site ⇒

↓ – cover sawdust piles

3/26/2013

2005

Dan
~~Dave~~ Cullen - 4023
Greg Bonadies - 4039
Dan ~~Dan Bonadies~~ - 4031 - Ronald Cotner

Sulfidic Odor - windy
Burnt something
Heavy equipment & time of visit

- couple of months ago
  - never tells them what's

Breathing problems - can't enjoy outdoors
- want facility to close until air quality is under control
- pattern of occurring @ end of week/ weekend.
- Breathing indoors
- Oily Rag / Leachate

Want a way to identify diff. odors
- physically ill - Dave Cullen

Experience yr. round

Brock, Lindsay

From: Gibbs, Ana
Sent: Tuesday, March 26, 2013 12:51 PM
To: Armstrong, Brian J.; Pelz, Susan; Brock, Lindsay; Langford, Mark; DiBacco, Erin
Subject: FW: Thanks

Just fyi.

Ana Gibbs
External Affairs Manager
Florida Department of Environmental Protection
13051 N. Telecom Parkway
Temple Terrace, FL 33637-0926
(813) 632-7600 Ext. 475
(813) 632-7665 Fax
email: ana.gibbs@dep.state.fl.us

-----Original Message-----
From: Gibbs, Ana
Sent: Tuesday, March 26, 2013 12:51 PM
To: 'Daniel Cullen'
Subject: RE: Thanks

Good Afternoon Mr. Cullen,

Thank you for your email. We wanted to get our staff to your location while the odors were occurring. Since we received your emails on Monday afternoon, we thought today may be a good day to visit the neighborhood. I'll keep you updated as we continue to research this situation.

Best Regards,

Ana Gibbs
External Affairs Manager
Florida Department of Environmental Protection
13051 N. Telecom Parkway
Temple Terrace, FL 33637-0926
(813) 632-7600 Ext. 475
(813) 632-7665 Fax
email: ana.gibbs@dep.state.fl.us

-----Original Message-----
From: Daniel Cullen [mailto:danielcullen@gmail.com]
Sent: Tuesday, March 26, 2013 12:47 PM
To: Gibbs, Ana
Subject: Thanks

Ana,

Thanks so much for sending your staff to visit our neighborhood.They were able to experience,first-hand,some of what we have to live with.My neighbors and I were able to have a long discussion with them and we conveyed our concerns and fears to them.Please express our thanks to Lindsay and Mark for their visit.
Respectfully,
Dan

Sent from my iPhone

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

RICK SCOTT
GOVERNOR

HERSCHEL T. VINYARD JR.
SECRETARY

June 19, 2013

Mike Zellars, Vice President
Aqua Clean Environmental Co., Inc.
3210 Whitten Rd.
Lakeland, FL 33811
mszellars@acelkd.com

Re: Compliance Assistance Offer
Aqua Clean Environmental Co., Inc./Florida Recycling Solutions
FLR000034033
Polk County

Dear Mr. Zellars,

A Hazardous Waste Program inspection was conducted at your facility on April 15, 2013, under the authority of Sections 403.061, 403.141, 403.727, and 403.859 through 403.861, Florida Statutes (F.S.). During this inspection, possible violations of Chapter 403, F.S, Chapters 62-4, 62-160, 62-701, 62-710, 62-730, 62-740 and 62-762 of Florida Administrative Code (F.A.C.) were observed. The purpose of this letter is to offer you compliance assistance as a means of resolving these matters.

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

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

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

Please address your response and any questions to Susan Pelz of the Southwest District Office at (813) 632-7600, extension 336, or via e-mail at Susan.Pelz@dep.state.fl.us. We look forward to your cooperation with this matter.

Sincerely,

Brian J. Armstrong, PG
Assistant Director
Southwest District
Florida Department of Environmental Protection

BJA/ED/sdc/SP

Enclosures: Inspection Report

ec: Ron Noble, Fowler White (rnoble@fowlerwhite.com)

Florida Department of

Environmental Protection

Hazardous Waste Inspection Report

FACILITY INFORMATION:

Facility Name: Aqua Clean Environmental/Florida Recycling Solutions

On-Site Inspection Start Date: 04/15/2013 **On-Site Inspection End Date:** 04/15/2013

ME ID#: 21896 **EPA ID#:** FLR000034033

Facility Street Address: 3210 Whitten Rd, Lakeland, Florida 33811-1086

Contact Mailing Address: 3210 Whitten Rd, Lakeland, Florida 33811-1086

County Name: Polk **Contact Phone:** (863) 644-0665

NOTIFIED AS:

Non-Handler

Used Oil

INSPECTION TYPE:

Routine Inspection for Used Oil Processor facility

INSPECTION PARTICIPANTS:

Principal Inspector: Shannon D. Camp, Inspector

Other Participants: Mike Zellars, Plant Manager; Susan Pelz, Environmental Manager; Nancy Gaskin, Env. Eng.

LATITUDE / LONGITUDE: Lat 28° 0' 18.6604" / Long 82° 2' 33.4423"

SIC CODE: 7389 - Services - business services, nec

TYPE OF OWNERSHIP: Private

Introduction:

Aqua Clean Environmental (ACE)/Florida Recycling Solutions (FRS) was inspected on April 12, 2013, to determine the facility's compliance with state and federal hazardous waste and used oil regulations. ACE and FRS are sister corporations that share this facility and this EPA Identification Number. ACE is a registered transporter of used oil, used oil filters, and petroleum contact water (PCW). ACE also operates a Centralized Waste Pretreatment facility at this location that discharges to the City of Lakeland sewer system. FRS is a permitted used oil processor and receives used oil transported by ACE. FRS is also permitted to process oil contaminated debris.

Process Description:

ACE/FRS operations are discussed in detail in the facility's Used Oil and Material Processing Permit. Minor descrepancies in the permit and operations include: FRS currently only has and uses one boiler to burn on specification used oil incidently to processing used oil. The Annual Report by Used Oil and Used Oil Filter Handlers submitted to the Department by FRS for 2012 indicates that the facility only burned 321 gallons of on specification used oil in 2013.

The Department has received several complaints about off-site odors at the ACE/FRS facility. Department staff detected odors on-site during the inspection and discussed possible odor sources and current odor control measures taken onsite with facility staff. The Department requests that ACE/FRS provide information regarding on-going odor investigation and remediation efforts at the facility.

Excessive dust was also observed on site during this inspection. The Department requests that ACE/FRS employ a method of dust control, such as a screened cover, for the piles of sawdust stored on site to prevent off-site dust migration.

Inspection Date: 04/15/2013

New Potential Violations and Areas of Concern:

Violations

Type:	Violation
Rule:	262.11
Explanation:	Prior to the inspection, the facility was not conducting a proper waste determination on filter basket solids and tank bottoms generated from tanks 6,7,8 and 9. ACE/FRS was solidifying these wastes prior to testing to determine if they were characteristically toxic by analysis.
Corrective Action:	ACE/FRS must conduct a proper waste determination on these materials as they are generated (prior to comingling or diluting with solidification materials). A proper waste determination includes analyzing the material by the Toxicity Characteristic Leaching Procedure for the eight RCRA heavy metals, volatile organic compounds and semi-volatiles.

Type:	Violation
Rule:	403.727(1)(c)
Explanation:	The facility failed to comply with the following conditions of the used oil and material processing permit: Part IV.1.c&d: the facility was unable to demonstrate to the Department that the amount of non-hazardous oil contaminated solid waste accumulated on site at any given time does not exceed fifty 55-gallon drums (or equivalent volume) and three 35 cubic yard containers. In addition, the facility could not demonstrate that they had not exceeded the maximum permitted amount of oil contaminated solid waste that is to be brought into and processed at the facility outlined in the permit (720 cubic yards). Part I.27 At the time of the inspection, the faciltiy was storing used oil in at least one 55-gallon drum in the used oil filter processing area. The permit does not allow for the storage of used oil outside the permitted tank system shown in Attachment A of the permit. In addition, it is unclear if this area has appropriate secondary containment. Part IV: Facility records show receipt of potentially non-oil contaminated wastes at the facility such as clean-out fluff and sludge from Cintas industrial laundry. Facility staff indicated that these wastes were off-loaded directly onto the mixing pad or "moat" for solidification and disposal. The current facility waste processing and used oil processor permit authorizes the management of oil contaminated solid wastes only.
Corrective Action:	The facility appears to manifest all solid waste, including the oil contaminated solid waste, to ACE only. Records provided during the inspection, along with discussions with facility personnel, indicate that all solid waste received, generated, or processed at the facility, including solid wastes generated from the industrial wastewater treatment portion of the facility are co-mingled and managed by ACE. Unless the facility (ACE/FRS) operations can be clearly distinguished, oil contaminated debris should be segregated on manifests in which FRS is the destination facility. The facility must maintain appropriate documentation that demonstrates that amount of this material on site and processed annually does not exceed the permit limits. Please ensure only oil contaminated solid wastes are managed on the mixing

Inspection Date: 04/15/2013

pad. Alternatively, submit an application for a modification to the facility permit and operation plan to allow for other types of wastes to be managed at the facility.

Type: Violation

Rule: 62-710.401(6)

Explanation: At the time of the inspection, the facility was collecting used oil in multiple unlabeled containers. For example, the reservoirs beneath the used oil filter crusher were holding a large amount of used oil but were not labeled with the words "Used Oil." Also, several collection buckets were located within the tank containment system that were unlabeled.

Corrective Action: All tanks and containers used to collect or store used oil must be clearly labeled with the words "Used Oil."

Areas of Concern

Type: Area Of Concern

Rule: 403.727(1)(c)

Explanation: During the inspection, cracking and minor staining or seepage was observed along the base of the containment wall on the southern side of the "moat".

Corrective Action: Please repair or reseal these areas and restore leachate control to prevent mixing with stormwater pursuant to Florida Administrative Code Chapter 62-701.710(3)b F.A.C.

Type: Area Of Concern

Rule: 62-710.510(5)

Explanation: Review of the annual reports submitted by the facility (both ACE and FRS) for 2012 along with generator oily waste profiles indicates there are some discrepancies in characterizing "Used Oil." ACE's annual report indicates a large quantity of oily waste being solidified and landfilled. As FRS is the portion of the facility that is permitted to process this waste, this material should be included in FRS's annual report. Ideally, the only material ACE should be reporting on the Annual Report is the used oil that is transported from the generator to FRS (in addition to the PCW transported and processed). Several profiles of oily waste waters were reviewed and it was not clear if the material is "Used Oil" or was intended to be recycled by the generator pursuant to 40 CFR 279.

Corrective Action: Department recommends modifying the profile sheet to include language such as: "Is this material regulated under 40 CFR 279? Yes or No." Adding this line item will help clarify which oily waste waters are intended to be managed as used oil. If the materials are intended to be managed as used oil under 40 CFR 279, it should be manifested to FRS as the destination facility. The manifests reviewed during the inspection note ACE as the destination facility.

Inspection Date: 04/15/2013

Conclusion:

At the time of the inspection, Aqua Clean Environmental/Florida Recycling Solutions was not operating in compliance with state and federal used oil regulations and with their used oil processor permit. The Department requests that the facility contact the Southwest District Office to arrange for a meeting to discuss the findings of this inspection.

Inspection Date: 04/15/2013

Signed:

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

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

Shannon D. Camp
PRINCIPAL INSPECTOR NAME

Inspector
PRINCIPAL INSPECTOR TITLE

PRINCIPAL INSPECTOR SIGNATURE

5/6/2013
DATE

Supervisor: Erin DiBacco

Inspection Approval Date: 06/17/2013

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

FOWLER WHITE BOGGS
Attorneys at Law
Est 1943

Ron H. Noble
Direct Dial: 813-222-1175
rnoble@fowlerwhite.com

October 9, 2012

Mr. James M. Dregne
Hazardous Waste Program Manager
Southwest District
Florida Department of Environmental Protection
13051 N. Telecom Parkway
Temple Terrace, FL 33637-0926

Re: Final Sampling Plan for Aqua Clean Environmental Co., Inc., in Lakeland, Florida

Dear Mr. Dregne:

Enclosed please find the final Tiered Approach for Influent Sampling ("Sampling Plan") for the Aqua Clean Environmental Co., Inc. ("Aqua Clean") facility in Lakeland, Florida. We appreciate the Department's review and approval of the final revised Sampling Plan with a revision date of September 19, 2012.

The effective date of the Sampling Plan is November 1, 2012, so as to maintain consistency with and coincide with the effective date of the City of Lakeland Wastewater Discharge Permit issued to Aqua Clean with an effective date of November 1, 2012. I believe the Department is aware the Sampling Plan with the revision date of September 19, 2012, has been incorporated as a part of the City of Lakeland Wastewater Discharge Permit.

We appreciate the additional comments provided by the Department regarding the Sampling Plan, and we will review, evaluate and incorporate as appropriate these additional comments during the next revision to the Sampling Plan. Please be advised that Aqua Clean will revise and update the Sampling Plan on a periodic basis, but no less frequently than every two years.

Based upon this submittal of the final Sampling Plan with an effective date of November 1, 2012, we would appreciate the Department closing its enforcement case for the 2011 Warning Letter issued to Aqua Clean. Please provide a brief written update to my office as soon as the

Warning Letter has been officially closed and the Department's website updated accordingly. In the interim, please do not hesitate to contact me should you have any questions regarding the above matters or if the Department requires any additional information.

Sincerely yours,

FOWLER WHITE BOGGS P.A.

Ron H. Noble

cc: Mr. Mike Zellars (w/o encl.)

Enclosure

44969811v1

Notification of Process Change Checklist

Information about the Change:

Originator _____ Date of Origination _____

Proposed Date of Change _____ Area _____

☐Permanent ☐Temporary From _____ To _____

Description and Location of Change (Scope) _____

Technical Basis for Change _____

_____

Nature of the Change:

Change affects: ☐Safety ☐Loss Prevention ☐Environment ☐Health

Type of Change:

☐Alarm	☐Shutdown Point	☐Addition or Removal of Equipment
☐Piping Modification	☐ Chemical	☐Process Computer Control
☐Job Procedure	☐ Instrument	☐Equipment/Material Modification
☐Other _____		

Premodification Checklists:

Applicable	NA	Initials	
☐	☐	____	Consult piping and equipment specifications.
☐	☐	____	Perform reactive chemicals testing. ☐ In process?
☐	☐	____	Add involved materials to Toxic Substance Control Act (TSCA) inventory.
☐	☐	____	Calculate impact on F&EI and CEI.
☐	☐	____	Comply with Engineering Practices.
☐	☐	____	Comply with Technology Center guidelines.
☐	☐	____	Comply with Dow Environmental Protection Guideline for Operations.
☐	☐	____	Comply with Safety and Loss Prevention requirements.
☐	☐	____	Consult Maintenance (name)_____.
☐	☐	____	Consult instrument and electrical technician (name)_____.
☐	☐	____	Consult parts technician (name)_____.
☐	☐	____	Evaluate and modify relief system (name)_____.
☐	☐	____	Consult Industrial Hygiene (name)_____.
☐	☐	____	Consult Process Engineering (name)_____.
☐	☐	____	Complete required reviews (name reviews)_____.
☐	☐	____	Other_____.

Postmodification Checklist (Before Startup).

Applicable	N/A	Initials	
☐	☐	____	Performed prestartup audit.
☐	☐	____	Completed or updated training program.
☐	☐	____	Wrote and obtained approval for job procedures.
☐	☐	____	Updated P&IDs process flow sheets and plot plans.
☐	☐	____	Trained personnel on the change.
☐	☐	____	Updated critical instrument checklist.
☐	☐	____	Changed computer code and documentation.

Approvals:

	Name	Date
Originator	_____	
First Reviewer	_____	
Department Head/Superintendent	_____	

Brown AND Caldwell

1560 Sawgrass Corporate Parkway, 4th Floor
Sunrise, FL 33323
Tel: 954-331-4650
Fax: 561-684-9902

Technical Memorandum

Prepared for: Aqua Clean Environmental Co., Inc.

Project Title: Tiered Approach for Influent Sampling

Project No: 142636

Technical Memorandum

Subject: Tiered Approach for Influent Sampling

Date: April 18, 2012
Revised May 1, 2012
Revised September 19, 2012

To: Mike Zellars, General Manager, Aqua Clean
Ron Noble, Fowler White Boggs

From: Everett Gill, P.E., Brown and Caldwell

Prepared by: Everett Gill
Everett Gill, P.E.

Reviewed by:
Chris Stanfill

Limitations:

This document was prepared solely for Aqua Clean in accordance with professional standards at the time the services were performed and in accordance with the contract between Aqua Clean and Brown and Caldwell. This document is governed by the specific scope of work authorized by Aqua Clean; it is not intended to be relied upon by any other party except for regulatory authorities contemplated by the scope of work. We have relied on information or instructions provided by Aqua Clean and other parties and, unless otherwise expressly indicated, have made no independent investigation as to the validity, completeness, or accuracy of such information.

1. Introduction

Aqua Clean Environmental Co., Inc. (Aqua Clean) owns and operates an industrial wastewater pretreatment facility in the City of Lakeland, Florida (Lakeland). This facility treats non-hazardous industrial wastewater and is regulated by the Centralized Waste Treatment (CWT) rule (40 CFR 437). Under this rule, Aqua Clean is permitted to receive wastewaters that are regulated under Subpart B (Oils Treatment and Recovery) and Subpart C (Organics Treatment and Recovery).

Lakeland has requested that Aqua Clean prepare a sampling plan and schedule in order to evaluate that Aqua Clean's current customer waste profiles have not changed and to establish a protocol for initial waste profiles to be performed on all new customers consistent with the requirements of the Wastewater Discharge Permit.

The purpose of this sampling plan and schedule is to outline the minimum sampling for customers based upon a tiered approach to address Lakeland's concerns with respect to the type of wastewater and volume of wastewater provided by each customer. Some wastewaters, such as carwashes, slaughterhouses, and many manufacturing facilities, are relatively consistent. They are generated from a single source or process that are not reasonably expected or anticipated to change over time. Other sources of wastewater, such as petroleum contact water from gas stations, may change in concentrations or levels of specific constituents such as oil and grease, however, the presence of other constituents such as some metals, do not change significantly. Other wastewaters such as landfill leachate or disposal contractors, may change from landfill to landfill and possibly even season to season based upon rainfall volume and therefore require more frequent testing because the wastewater is not always relatively consistent.

This sampling plan addresses variations in wastewater characteristics based on industry type. Aqua Clean is permitted to accept oil and organics waste, however it is not permitted, nor is it equipped, to treat Subpart A waste (Metals Bearing Waste). The testing proposed includes a comprehensive metals sampling in order to evaluate if a wastewater should not be accepted, including wastewaters that may fall in the Subpart B (Oil) category but contain metal concentrations above the threshold to be considered a Subpart A wastewater. This sampling is not designed to evaluate treatment efficiency of constituents; that testing is conducted per the requirements of the Periodic Certification Statements and the Initial Certification Statement testing.

The treatment plant Operator will be responsible for identifying more frequent testing or additional wastewater constituents that warrant additional testing beyond the minimum listed in this TM. The wastewater from each individual truck will be physically inspected by an Aqua Clean operator, either from samples pulled directly from the delivering truck or from the receiving pit. All information identified will be noted on the Aqua Clean transportation documents or on the Material Data Certification Sheet. Circumstances which may cause the Operator to require additional testing include (but are not limited to):

- Increased solids concentration or turbidity compared to typical delivery
- Change in odor or appearance in the wastewater
- Change in delivery times or delivery trucks
- Uncharacteristically high volume of wastewater for a particular client
- Increase in wastewater delivery after a long period of no delivery
- Changes to the Material Data Certification Sheet
- Waste from contract haulers

2. Analytical by Industry

The recommended tiered approach for testing is based on a combination of flows as well as industry type. Some industries, such as landfill leachate, require a higher number of analyses due to changing constituents as opposed to other industries, such as petroleum contact water, where the constituents are typically consistent from load to load, however the concentrations may vary. Industries and customers with high volumes or more frequent changes in wastewater characteristics are expected to be evaluated at a higher frequency.

2.1 All Shipments

All wastewaters delivered to Aqua Clean will require a Material Data Certification Sheet. Aqua Clean maintains a file for each customer that includes all of the previous test results performed for that customer as well as the waste profile documentation provided by that customer and any testing which the customer has performed on its wastewater. This sheet is provided in Appendix A.

Wastewater deliveries which containing mixed waste streams and different Subparts from third party transporters and customers, Aqua Clean and the Quality Control and Compliance Superintendent will sample and analyze every load for Tier 1 oil (see Table 1) before the load is authorized for unloading.

2.2 New Customers

As described above, all new customers require a Material Data Certification Sheet profile. Additionally, all new customers will first be categorized into one of the following industry types (described in subsequent sections):

- Subpart B – Oily Wastewater/Petroleum Contact Water – Small Volume
- Subpart B – Contaminated Groundwater From Petroleum Sources
- Subpart B – Oily Wastewater/Petroleum Contact Water – Large Volume
- Subpart C - Contaminated Groundwater from Non-petroleum Sources
- Subpart C – Non-Specific Organic Wastewater
- Subpart C – Landfill Leachate
- Subpart C – Small Volume Organic Wastewater

Prior to accepting the wastewater, Aqua Clean will perform an initial characterization based on the tiered sampling plan described below; subsequent sampling frequency will depend on industry type. Sampling for most requirements and parameters, the type of wastewater was selected over the volume of wastewater due to the relative consistency of many Aqua Clean high volume wastewater customers and the actual variability of wastewater consistency for some of Aqua Clean's lower volume customers. Additional testing will be performed for a length of time and frequency until such time as Aqua Clean is confident that a proper waste characterization is established for each customer.

2.3 Analysis of Samples

The analysis, depending on the parameter to be analyzed, will occur at the Aqua Clean on-site laboratory or at a third party off-site certified location. If Aqua Clean does not have the on-site laboratory equipment to perform the specified analysis, then Aqua Clean and/or the customer will utilize on off-site certified laboratory for the analysis. The test results generated from the on-site laboratory are used for waste characterization and screening purposes and not for regulatory reporting requirements.

The on-site equipment and test methods include the following:

- ICP Metals - Method EPA 200.7
- pH – Electrometric Method by Probe (Method EPA 150.1)
- COD – LaMotte 0074-SC Mercury-Free Multi-Range COD (Acid Digestion)
- Ethylene Glycol – Hach Model GE-1 (Visual/Appearance of Color)
- Conductivity – Electrical Conductivity Meter

In order to ensure the accuracy of in-house laboratory test results of the ICP, periodic split samples are obtained from a single source of wastewater and analyzed in-house and also sent to the off-site third party certified laboratory. Additionally, known samples are analyzed for accuracy.

2.4 Subpart B - Oil

This subpart includes wastewaters that have an oil and grease (O&G) concentration typically >100 mg/L. These wastewaters include petroleum contact water (PCW) as defined by FAC Rule 62-740, wastewaters contaminated with oil such as car wash wastewater, and wastewaters generated from a process where oil is the contaminant of concern regardless of the O&G concentration, such as contaminated groundwater from petroleum sources.

2.4.1 Oily Wastewater/Petroleum Contact Water – Small Volume

These wastewaters are typically characterized by high concentrations of oil and low concentrations of metals. The constituents of this wastewater typically do not significantly change between shipments. This wastewater will be tested a minimum of one time per year per client for Tier 1 Oil constituents.

Table 1. Recommended Subpart B (Oils Treatment and Recovery) - Tier 1 Sampling

Parameter Type	Parameter	Analyze Onsite
Conventional	Flow	Yes
	pH	Yes
Metals	Cadmium	Yes
	Chromium	Yes
	Copper	Yes
	Nickel	Yes
	Zinc	Yes
	Molybdenum	Yes

2.4.2 Contaminated Groundwater from Petroleum Sources

The consulting engineer for contaminated groundwater sources typically has extensive data on this type of wastewater. If this data is not available, or the Operator had indications that the wastewater characterization may have changed, the wastewater will be analyzed for Subpart B, Tier 1 constituents as listed in Table 1 for a minimum of one time per year.

2.4.3 Oily Wastewater/Petroleum Contact Water - Large Volume

As with the small volume petroleum contact wastewaters/oily wastewater, these wastewaters are typically characterized by high concentrations of oil and low concentrations of metals. Clients that deliver a larger volume (50,000 gallons/year or more) of this wastewater will increase testing to a minimum of two times per year based on the Tier 2 – Oils Treatment and Recovery constituent list.

Table 2. Recommended Subpart B (Oils Treatment and Recovery) - Tier 2 Sampling

Parameter Type	Parameter	Analyze Onsite
Conventional	Flow	Yes
	pH	Yes
	Ethylene Glycol	Yes
Metals	Cadmium	Yes
	Chromium	Yes
	Copper	Yes
	Nickel	Yes
	Zinc	Yes
	Molybdenum	Yes

2.5 Subpart C – Organics

This subpart includes wastewaters that have oil and grease concentrations <100 mg/L and contain metal concentrations less than the Subpart A limits, or do not originate from a metals process. These wastewaters typically have a high concentration of organic compounds; however some wastewaters with low organic compound concentrations, such as contaminated groundwater from non-petroleum sources, also require pretreatment under this subpart. The organics wastewaters accepted include nonhazardous organics wastewater and organic wastewater that is not characterized hazardous as identified on the MDCS.

2.5.1 Contaminated Groundwater from Non-Petroleum Sources

The consulting engineer for contaminated groundwater sources typically has extensive data on this type of wastewater. If this data is not available, or the Operator has indications that the wastewater characteristics may have changed, the wastewater will be analyzed for Subpart C, Tier 1 constituents as listed in Table 3. The testing will be conducted one time per year minimum.

Table 3. Recommended Subpart C (Organics Treatment) - Tier 1 Sampling		
Parameter Type	**Parameter**	**Analyze Onsite**
Conventional	Flow	Yes
	pH	Yes
	COD (Surrogate for BOD)	Yes (COD used as surrogate for BOD)
Metals	Cadmium	Yes
	Chromium	Yes
	Copper	Yes
	Nickel	Yes
	Zinc	Yes
	Molybdenum	Yes

2.5.2 Non-Specific Organic Wastewater

Organic wastewater from a facility that does not fall into one of the other defined organics categories, and the volume is greater than 1,000 gallons per year, will be considered a Tier 2 Organics. These wastewaters constituents will be evaluated at a minimum of two times per year. The constituents for Tier 2 Organics sampling are listed in Table 4.

Table 4. Recommended Subpart C (Organics Treatment) - Tier 2 Sampling		
Parameter Type	**Parameter**	**Analyze Onsite**
Conventional	Flow	Yes
	pH	Yes
	COD (Surrogate for BOD)	Yes (COD used as surrogate for BOD)
	Ethylene Glycol	Yes
Metals	Cadmium	Yes
	Chromium	Yes
	Copper	Yes
	Nickel	Yes
	Zinc	Yes
	Molybdenum	Yes

2.5.3 Landfill Leachate

Landfills collect extensive analytical data that is provided to Aqua Clean. If characterization data is not provided, then Aqua Clean will analyze the wastewater per the requirements of the Tier 3 Organics constituents listed in Table 5; the Tier 3 list includes all compounds in Aqua Clean's discharge permit. A minimum testing for Tier 3 Organics list will be conducted one time per year.

Table 5. Recommended Subpart C (Organics Treatment) - Tier 3 Sampling

Parameter Type	Parameter	Analyze Onsite
Conventional	Flow	Yes
	BOD	No/Yes (COD as surrogate)
	TSS	No
	TN	No
	Oil and Grease (total)	No
	Conductivity	Yes
	pH	Yes
	Cyanide	No
Metals	Arsenic	Yes
	Cadmium	Yes
	Mercury	No
	Molybdenum	Yes
	Nickel	Yes
	Selenium	Yes
	Silver	Yes
	Chromium	Yes
	Cobalt	Yes
	Copper	Yes
	Lead	Yes
	Tin	No
	Zinc	Yes
Organics	Benzene	No
	Ethyl Benzene	No
	Toluene	No

Table 4 (Continued). Recommended Subpart C (Organics Treatment) - Tier 3 Sampling

Parameter Type	Parameter	Analyze Onsite
	Xylene	No
	Bis(2-ethylhexyl) Phthalate	No
	Carbazole	No
	o-Cresol	No
	p-Cresol	No
	n-Decane	No
	Fluoranthene	No
	n-Octadecane	No
	2,4,6 - Trichlorophenol	No

2.5.4 Small Volume Organic Wastewater

Wastewater from a facility that does not fall in the previous categories and is less than 1,000 gallons will only require a Material Data Certification Sheet unless the possibility of metals is suspected, then analysis per the requirements of Tier 1 Organics (Table 3) will be conducted.

Attachment A: Material Data Certification Sheet

MATERIAL INFORMATION

Source:

Flashpoint ❑ Exact_____ ❑ <140 ❑ 140-200 ❑ >200

pH ❑ Exact_____ ❑ <2 ❑ 2-5 ❑ 5-9 ❑ 9-12.5 ❑ >12.5

Specific Gravity ❑ _____ ❑ <0.8 ❑ 0.8-1.0 ❑ 1.0 ❑ 1-1.2 ❑ >1.2

Reactive ❑ Yes ❑ No

%Liquid_____ %Solid_____ %Sludge_____ % Water _____

Phases ❑ Single ❑ Double ❑ Multi
Viscosity ❑ Low ❑ Medium ❑ High
Odor ❑ None ❑ Mild ❑ Strong

Color/Appearance: _____ Cloudy or Clear: _____

CERTIFICATION

Are any pesticides, herbicides or dioxin present? ❑ Yes ❑ No

Are any biotoxic components present in the material such as cyanide, chlorine, ethylene glycol, etc.)?
❑ Yes ❑ No

Are any PCBs present in the material? ❑ Yes ❑ No

Is there more than one fuel present? ❑ Yes ❑ No

Does the material meet the definition of a hazardous waste, or is the material characteristically ignitable, corrosive, reactive or toxic as defined under 40CFR Part 261, or does the material contain a hazardous waste listed in 40 CFR Part 261 Subpart D in concentrations that are not excluded under 40 CFR Part 261.3? ❑ Yes ❑ No

GENERATOR'S CERTIFICATION

I hereby certify that the above description, as well as any other information provided to AQUA CLEAN ENVIRONMENTAL is complete and accurate to the best of my knowledge and ability. I certify that the above described material is the specified material as defined by the above conditions. If my material is found not to be the specified material as defined by any of the above conditions, I am liable for any and all penalties and fines assessed against or expenses, costs (including legal fees), or other damages incurred by AQUA CLEAN ENVIRONMENTAL.

Authorized Signature_____ Printed Name_____

Title_____ Date_____

This certification has been reviewed by Aqua Clean for the wastewater delivered to Aqua Clean based on the information provided by the Generator.

_____
Aqua Clean

MATERIAL DATA CERTIFICATION SHEET

AQUA CLEAN ENVIRONMENTAL CO., INC.
3210 WHITTEN ROAD
LAKELAND, FL 33811
(863) 644-0665 PHONE (863) 646-1880 FAX

_____New Profile
_____Amendment

GENERATOR INFORMATION
Generator Name:_____

Address:_____

City:_____State:_____Zip

Contact: _____

Phone: _____Fax: _____

BILLING INFORMATION
Bill To:_____

Address: _____

City:_____State:_____Zip:_____

Billing Contact: _____

Phone:_____Fax:

TRANSPORTATION INFORMATION
Transporter:_____

Estimated Total Gallons	Shipping Container	Shipping Frequency
_____	❑ Drum	❑ One Time
Actual	❑ Tanker	❑ Week
Total Gallons	❑ Other	❑ Month
		❑ Year
_____		❑ Other

D.O.T. SHIPPING NAME:_____

MATERIAL COMPOSITION
Component _____ Concentration _____%
_____ _____%
_____ _____%
How was this wastewater generated:_____

USED OIL
MATERIAL INFORMATION

Source:

Constituent/Property	Level (ppm)
Arsenic	_____
Cadmium	_____
Chromium	_____
Lead	_____
Flashpoint	
Total Halogens	_____

%Liquid_____ %Solid_____ %Sludge

Phases	❑ Single	❑ Double	❑ Multi
Viscosity	❑ Low	❑ Medium	❑ High
Odor	❑ None	❑ Mild	❑ Strong

Color/Appearance _____

CERTIFICATION

Are any pesticides, herbicides or dioxin present? ❑ Yes ❑ No

Are any biotoxic components present in the material such as cyanide, chlorine, ethylene glycol, etc.)? ❑ Yes ❑ No

Are any PCBs present in the material? ❑ Yes ❑ No

Is there more than one fuel present? ❑ Yes ❑ No

Does the material meet the definition of a hazardous waste according to 40CFR Part 261 and the Florida Hazardous Waste Regulations? ❑ Yes ❑ No

GENERATOR'S CERTIFICATION

I hereby certify that the above description, as well as any other information provided to AQUA CLEAN, is complete and accurate to the best of my knowledge and ability. I certify that the above described material is the specified material as defined by any of the above conditions, I am liable for any and all penalties and fines assessed against or expenses, costs (including legal fees), or other damages incurred by AQUA CLEAN ENVIRONMENTAL CO INC.

Authorized Signature_____ Printed Name_____

Title_____ Date_____

10/11/13

CAO Meeting

Aqua Clean thr/SW Meeting.

RN Written response after Todays meeting
containment wall solidification
3rd party concretion co.
Seal / resurface both side - just wall not bottom

MZ

RN - designation manifest "oily water"
- "Oily Waste Water" now
- sludge stuff

NG Not be called oil contaminated, if its not.

SJP Is it going for recycling, or not?

NG used Oil going for recycling →
Wastewater is not used oil →
FRS has recovery process.

RN Flowchart
- Is ~~this~~ this material going for recycling / oil recovery under 279 doesnt need to be.

MZ Everything arrives from Aqua Clean. we have a form that shows me we transfer.

SJP If you have a statement on manifest, "Material is going for recovery under Used Oil rule." If not, need manifest.

RN concerned that material is "too broad."
Internal paperwork - tie indiv paperwork / invoices to
SJP how its get profiled, manifested, analytes were interested
RN City of Lakeland Sampling Plans.

RN How to match match manifests to profiles.
Some customers are sampling every load.

SJP Waste streams are so variable. We have to be able to follow thread.

MZ At least 1x per year.

RN Profiles to load - # assigned.

SJP If you'd provide 1 example where manifest goes w/ profile + analytical. Do you have that?

MZ ~~Every~~ Safety COD, Metals (not cyanide) pH, glycol, Spec Cond.

Is that enough?

RN That's our exception for customers who don't have profile
~~Typically, most of~~

SJP Oily wastewater vs. the leachate. You're testing for different things.

MZ Safety Kleen is generator b/c ~~they don't~~ it's proprietary.

RN Drivers aren't filling out ~~manifest~~ profiles. They fill out manifests.

RM We've asked them not to fill out

NG Have you done any retraining w/ drivers re: manifests.

SJP Generator is telling them

RN & MZ 4 weeks - we're

SJP - What we need to see
- We needed to see some change

NG -

RN Waste determination - process waste - tank bottoms haven't had to do that in PCW tanks. Haven't been req to do that before.

6, 7, 8 Used Oil (FRS)
1, 2 are discharge tanks
4, 5

RN We thinking of a frequency (Qtrly for a year) If Ok, annually thereafter.

SJP - OK as starting pt.

RN Filter baskets are sure.

SJP 6-7-8 If you ever have to clean out tank bottoms,

MZ 6-7 are co-mingled

RN What about 4+5?

SJP 4+5 - combined sampled if emptying at same time.

RN 4+5 Qtrly for year. If Ok, then annually

NG/SJP provide example of log (filled out)

RN Port Tampa - fully permitted for subpart A, B, + C.

MZ & Cintas ~~Safety~~ fluff -

SJP Do you test Cintas fluff for dry cleaning waste. Perc - that's not in used oil permit that reasonably could be expected.

RN We mod. permit in Tampa to fix problem in Lakeland.

SJP As long as you don't ~~need~~ take non-Oily waste.

RN Anything going into pit is ~~not~~ only Oily waste.

NG pit capacity

RN logs - .

SJP Are you tracking solids separately + shortcuts going to moat.

NG ~~New used oil stuff~~ ~~AF~~ ~~goes~~ ~~to~~ FRS need to be tracked separately

Oily waste from FRS ↗

NG Antifreeze -

MZ FRS picks it up Tank 10 3000 sells it to treaters.

SJP Action Items: 1) Indexing - more homework 2) Cintas

Timeline: Plan w/ definitive timeframes 1 week.

w/ schedule

anything you've got from Cintas.

Florida Department of Environmental Protection

Southwest District
13051 N. Telecom Parkway
Temple Terrace, Florida 33637-0926
(813) 632-7600

Rick Scott
Governor

Herschel T. Vinyard, Jr.
Secretary

DATE: 10/10/13

TIME: 2pm

LOCATION/CONFERENCE ROOM: Rm 205

SUBJECT: ACE / FRS

ATTENDEES

Name	Affiliation	Telephone	E-mail (All DEP employees' email ends in: @dep.state.fl.us)
Nancy Gasken	FDEP, Solid Waste	(813) 470-5797	Nancy.Gasken@
Susan Pelz	DEP -	470-5790	susan.pelz@
Stephanie Watson	DEP CAP	470-5796	stephanie.m.watson
Ron Noble	Fowler White	222-1175	rnoble@fowlerwhite.com
Mike Zellars	Aqua Clean ENV	863 712 6655	mszellars@acelkd.com

MATERIAL DATA CERTIFICATION SHEET

AQUA CLEAN ENVIRONMENTAL CO., INC.
3210 WHITTEN ROAD
LAKELAND, FL 33811
(863) 644-0665 PHONE (863) 646-1880 FAX

/ New Profile
____ Amendment

GENERATOR INFORMATION
Generator Name: Apple Steel Rule Die Co AC-AP1120-DS

Address: 6545 44th Street North
City: Pinellas Park State: FL Zip 33781

Contact: Jim Wambold

Phone: 727 527 0098 Fax: 727 527 0991

moat only

BILLING INFORMATION
Bill To: Clean Harbors Environmental

Address:
170 Bartow Municipal Airport

City: Bartow State: FL Zip: 33830

Billing Contact: DEE McDuffie

Phone: 863-519-6336 Fax: 863 519 6306

TRANSPORTATION INFORMATION
Transporter: Clean Harbors

Estimated Total Gallons	Shipping Container	Shipping Frequency
5000	☐ Drum	X☐ One Time
Actual Total Gallons	X☐ Tanker	☐ Week
	☐ Other	☐ Month
		☐ Year
		☐ Other

D.O.T. SHIPPING NAME: Non Hazardous Non D.O.T.Regulated material.(oil, water) NA.

MATERIAL INFORMATION

Source:_____
Flashpoint ☐ Exact____ ☐ <140 ☐ 140-200 x ☐ >200

pH ☐ Exact____ ☐ <2 ☐ 2-5 x☐ 5-9 ☐ 9-12.5 ☐ >12.5

Specific Gravity ☐ ____ ☐ <0.8 ☐ 0.8-1.0 ☐ 1.0 ☐ 1-1.2 ☐ >1.2

Reactive ☐ Yes ☐ No

%Liquid_____ %Solid_____ %Sludge_____ % Water ___100_____

Phases	x☐ Single	☐ Double	☐ Multi
Viscosity	x☐ Low	☐ Medium	☐ High
Odor	☐ None	x☐ Mild	☐ Strong

Color/Appearance: __brown to green_ Cloudy or Clear: _____varied_____

CERTIFICATION
Are any pesticides, herbicides or dioxin present? ☐ Yes x ☐ No

Are any biotoxic components present in the material such as cyanide, chlorine, ethylene glycol, etc.)? ☐ Yes x☐ No

Are any PCBs present in the material? ☐ Yes x☐ No

Is there more than one fuel present? ☐ Yes x☐ No

Does the material meet the definition of a hazardous waste, or is the material characteristically ignitable, corrosive, reactive or toxic as defined under 40CFR Part 261, or does the material contain a hazardous waste listed in 40 CFR Part 261 Subpart D in concentrations that are not excluded under 40 CFR Part 261.3? ☐ Yes x☐ No

GENERATOR'S CERTIFICATION
I hereby certify that the above description, as well as any other information provided to AQUA CLEAN ENVIRONMENTAL is complete and accurate to the best of my knowledge and ability. I certify that the above described material is the specified material as defined by the above conditions. If my material is found not to be the specified material as defined by any of the above conditions, I am liable for any and all penalties and fines assessed against or expenses, costs (including legal fees), or other damages incurred by AQUA CLEAN ENVIRONMENTAL.

Authorized Signature [signature] Printed Name JAMES HAMBOCD

Title PLANT MANAGER Date 2/15/13

This certification has been reviewed by Aqua Clean for the wastewater delivered to Aqua Clean based on the information provided by the Generator.

_____
Aqua Clean

MATERIAL INFORMATION

Source:_____

Flashpoint ☐ Exact_____ ☐ <140 ☐ 140 200 x ☐ >200

pH ☐ Exact_____ ☐ <2 ☐ 2-5 x☐ 5-9 ☐ 9-12.5 ☐ >12.5

Specific Gravity ☐ _____ ☐ <0.8 ☐ 0.8-1.0 ☐ 1.0 ☐ 1-1.2 ☐ >1.2

Reactive ☐ Yes ☐ No

%Liquid_____ %Solid_____ %Sludge_____ % Water ___100_____

Phases	x☐ Single	☐ Double	☐ Multi
Viscosity	x☐ Low	☐ Medium	☐ High
Odor	☐ None	x☐ Mild	☐ Strong

Color/Appearance: _brown to green_ Cloudy or Clear: _____varied_____

CERTIFICATION

Are any pesticides, herbicides or dioxin present? ☐ Yes x ☐ No

Are any biotoxic components present in the material such as cyanide, chlorine, ethylene glycol, etc.)? ☐ Yes x☐ No

Are any PCBs present in the material? ☐ Yes x☐ No

Is there more than one fuel present? ☐ Yes x☐ No

Does the material meet the definition of a hazardous waste, or is the material characteristically ignitable, corrosive, reactive or toxic as defined under 40CFR Part 261, or does the material contain a hazardous waste listed in 40 CFR Part 261 Subpart D in concentrations that are not excluded under 40 CFR Part 261.3? ☐ Yes x☐ No

GENERATOR'S CERTIFICATION

I hereby certify that the above description, as well as any other information provided to AQUA CLEAN ENVIRONMENTAL is complete and accurate to the best of my knowledge and ability. I certify that the above described material is the specified material as defined by the above conditions. If my material is found not to be the specified material as defined by any of the above conditions, I am liable for any and all penalties and fines assessed against or expenses, costs (including legal fees), or other damages incurred by AQUA CLEAN ENVIRONMENTAL.

Authorized Signature_____ Printed Name JAMES HAMBLO

Title PLANT MANAGER Date 2/15/13

This certification has been reviewed by Aqua Clean for the wastewater delivered to Aqua Clean based on the information provided by the Generator.

_____

Aqua Clean

MATERIAL DATA CERTIFICATION SHEET

AQUA CLEAN ENVIRONMENTAL CO., INC.
3210 WHITTEN ROAD
LAKELAND, FL 33811
(863) 644-0665 PHONE (863) 646-1880 FAX

/ New Profile
___ Amendment

GENERATOR INFORMATION
Generator Name:
Apple Steel Rule Die Co

Address: 6545 44th Street North
City: Pinellas Park State: FL Zip 33781

Contact: Jim Wambold

Phone: 727 527 0098 Fax: 727 527 0991

BILLING INFORMATION
Bill To: Clean Harbors Environmental

Address:
170 Bartow Municipal Airport

City: Bartow State: FL Zip: 33830

Billing Contact: DEE McDuffie

Phone: 863-519-6336 Fax: 863 519 6306

Solidification Only

TRANSPORTATION INFORMATION
Transporter: Clean Harbors

Estimated Total Gallons	Shipping Container	Shipping Frequency
5000	☐ Drum	X☐ One Time
Actual Total Gallons	X☐ Tanker	☐ Week
	☐ Other	☐ Month
		☐ Year
		☐ Other

D.O.T. SHIPPING NAME: Non Hazardous Non D.O.T.Regulated material.(oil, water) NA.

NON-HAZARDOUS WASTE MANIFEST

FS4954607-006

(Form designed for use on elite (12 pitch) typewriter)

NON-HAZARDOUS WASTE MANIFEST	1. Generator's US EPA ID No. FLR000085654	Manifest Document No. 336439	2. Page 1 of 1
3. Generator's Name and Mailing Address: Apple Steel Rule Die Co, 6545 44th Street North Suite 4003-4004, Pinellas Park FL 33781		Site Address: SAME	
		1303073	
4. Generator's Phone (727) 527-0098			
5. Transporter 1 Company Name: Clean Harbors Environmental Services Inc	6. US EPA ID Number: MAD039322250	A. State Transporter's ID	
		B. Transporter 1 Phone (781) 792-5000	
7. Transporter 2 Company Name	8. US EPA ID Number	C. State Transporter's ID	
		D. Transporter 2 Phone	
9. Designated Facility Name and Site Address: Aqua Clean Environmental Co., Inc, 3210 Whitten Road, Lakeland, FL 33811	10. US EPA ID Number: FLR000034033	E. State Facility's ID	
		F. Facility's Phone (863) 644-0665	

GENERATOR

11. WASTE DESCRIPTION	12. Containers No.	Type	13. Total Quantity	14. Unit Wt./Vol.
a. NON HAZARDOUS, NON D.O.T. REGULATED, (PROCESS WATER)	001	TT	2967	g
b.				
c.				
d.				

G. Additional Descriptions for Materials Listed Above

11a.AC-AP1120-DS

H. Handling Codes for Wastes Listed Above

3:10pm

15. Special Handling Instructions and Additional Information

W130236439 DM030613-02

EMERGENCY PHONE #: (800) 483-3718
GENERATOR: Apple Steel Rule Die Co

FOR SOLIDIFICATION ONLY

16. GENERATOR'S CERTIFICATION: I hereby certify that the contents of this shipment are fully and accurately described and are in all respects in proper condition for transport. The materials described on this manifest are not subject to federal hazardous waste regulations.

Printed/Typed Name	Signature	Month	Day	Year
JAMES LAMBORN	[signature]	3	6	13

TRANSPORTER

17. Transporter 1 Acknowledgement of Receipt of Materials

Printed/Typed Name	Signature	Month	Day	Year
ROBERTO DE LA CRUZ	[signature]	03	06	13

18. Transporter 2 Acknowledgement of Receipt of Materials

Printed/Typed Name	Signature	Month	Day	Year

FACILITY

19. Discrepancy Indication Space

20. Facility Owner or Operator; Certification of receipt of the waste materials covered by this manifest, except as noted in item 19.

Printed/Typed Name	Signature	Month	Day	Year
Mike Peace	[signature]	3	6	13

NON-HAZARDOUS WASTE

Aqua Clean
Environmental Co., Inc.

February 27, 2013

Ms. Aprilia Graves
Hazardous Waste Management Section
MS 4560
2600 Blair Stone Road
Tallahassee, Florida 32399-2400

Re: Report required under rule 62-740.300(5), F.A.C.

Dear Ms. Graves,

This letter shall constitute our report to the Department as required by the above referenced rule.

Total quantity PCW received by our facility during 2012---------- 1683701 gallons
Total product recovered during 2012---------- ---10894 gallons
Total estimated water in product---------- 1185 gallons
Estimated net product recovered---------- 9709 gallons

Please contact the writer if there are questions.

Sincerely,

Mike Zellars
Vice President
General Manager

3210 Whitten Road • Lakeland, Florida 33811
Telephone (863) 644-0665 • Toll Free (800) 644-0665 • Fax (863) 646-1880 • www.acelkd.com

Aqua Clean
Environmental Co., Inc.

February 27, 2013

Ms. Aprilia Graves
Hazardous Waste Management Section
MS 4560
2600 Blair Stone Road
Tallahassee, Florida 32399-2400

Re: Annual Used Oil Report required under rule 62-710.500 F.A.C.

Dear Ms. Graves,

Please accept this as our annual report of oily waste received or transferred during the year of 2012.

We received 914,664 gallons of oily waste during the year of 2012.

Aqua Clean's Used Oil Transporter Training Manual has previously been submitted and approved. The training program is still operating and it is being adhered to. There have been no changes to the Used Oil Transporter Manual.

Please contact the writer if there are questions.

Sincerely,

M. Zellars

Mike Zellars
Vice President
General Manager

3210 Whitten Road • Lakeland, Florida 33811
Telephone (863) 644-0665 • Toll Free (800) 644-0665 • Fax (863) 646-1880 • www.acelkd.com

FLORIDA RECYCLING SOLUTIONS, LLC

February 27, 2013

Ms. Aprilia Graves
Hazardous Waste Management Section
MS 4560
2600 Blair Stone Road
Tallahassee, Florida 32399-2400

Re: Annual Used Oil Report required under rule 62-710.500 F.A.C.

Dear Ms. Graves,

Please accept this as our annual report of used oil and oily waste received or transferred during the year of 2012.

We received 236,888 gallons of used oil and oily waste during the year of 2012 and approximately 83,125 used oil filters.

Please contact the writer if there are questions.

Sincerely,

Mike Zellars
Vice President
General Manager

Phone: (800) 644-0665 • Fax: (863) 646-1880
3210 Whitten Road • Lakeland, Florida 33811

FOWLER WHITE BOGGS
Attorneys at Law
Est 1943

Ron H. Noble
Direct Dial: 813-222-1175
rnoble@fowlerwhite.com

December 20, 2013

Brian J. Armstrong, P.G.
Assistant Director
Florida Department of Environmental Protection
Southwest District
13051 N. Telelcom Parkway
Temple Terrace, FL 33637-0926

Re: Final Response of Aqua Clean Environmental Co., Inc. and Florida Recycling Solutions to FDEP Compliance Assistant Offer for Polk County facility

Dear Mr. Armstrong:

The purpose of this correspondence is to provide the additional information and final responses requested by the Florida Department of Environmental Protection ("Department") in connection with the Department's Compliance Assistance Offer issued to Aqua Clean Environmental Co., Inc. ("Aqua Clean") and Florida Recycling Solutions ("FRS") based upon the Department's compliance inspection on April 15, 2013. We met with representatives of the Department on August 29, 2013, and October 10, 2013, to discuss and resolve the issues set forth in the Department's Compliance Assistance Offer. Aqua Clean and FRS offer the following information and final responses as requested by the Department. For ease of reference, we have set forth below the Department's requested "Corrective Actions" followed by Aqua Clean's response in the same order as set forth in the Department's April 15, 2013, Inspection Report.

1. ACE/FRS must conduct a proper waste determination on these materials as they are generated (prior to comingling or diluting with solidification materials). A proper waste determination includes analyzing the material by the Toxicity Characteristic Leaching Procedure for the eight RCRA heavy metals, volatile organic compounds and semi-volatiles.

   Response: As previously discussed with the Department, the filter baskets at Aqua Clean have been removed and will no longer be utilized. Therefore, no waste materials will be generated from filter baskets and no waste characterization is required in connection with the historical use of the filter baskets. The Department also requested a waste characterization for tank bottom

waste materials generated by Aqua Clean and FRS. Pursuant to our discussions with the Department, if waste materials are generated from the bottoms of tanks 6, 7, 8 and/or 9, they will be analyzed for a proper waste determination and characterization utilizing TCLP analysis for metals and volatile organic compounds. The same protocol will be utilized for tanks 3, 4 and/or 5 in the event that tank bottom waste materials are generated from these tanks. As we discussed, minimal solids are generated from these tanks, and in the event that tank bottoms are removed, a proper waste determination and characterization will be performed quarterly for one year and annually thereafter as set forth above. Pursuant to our discussions with the District and FDEP in Tallahassee, combined tank bottoms will be tested from tanks 3, 4 and/or 5 as well as tanks 6, 7, 8 and/or 9 (2 separate sets of samples) for the waste determination and characterization protocols set forth above.

2. The facility appears to manifest all solid waste, including the oil contaminated solid waste, to ACE only. Records provided during the inspection, along with discussions with facility personnel, indicate that all solid waste received, generated, or processed at the facility, including solid wastes generated from the industrial wastewater treatment portion of the facility are co-mingled and managed by ACE. Unless the facility (ACE/FRS) operations can be clearly distinguished, oil contaminated debris should be segregated on manifests in which FRS is the destination facility. The facility must maintain appropriate documentation that demonstrates that the amount of this material on site and processed annually does not exceed the permit limits.

   Response: As we discussed with the Department, Aqua Clean and FRS have agreed that all materials going to the solidification pad will be categorized and characterized as an oily waste. If materials accepted by Aqua Clean do not go through the wastewater treatment process, these materials will be properly managed by ACE on the solidification pad prior to disposal. We agreed with the Department that oily waste materials managed by ACE in this manner are not subject to the conditions or limitations in the FRS Permit issued by the Department. Aqua Clean and FRS will maintain a separate tracking system and a separate log will be maintained to document any internal transfers so that a copy of the internal transfer log can be provided to the Department. As discussed with the Department, oily waste materials manifested to FRS will still be invoiced to the customer through Aqua Clean. Aqua Clean's Tampa facility is now permitted to accept Subpart A Metal Bearing Wastes, so there will be no need to process any Subpart A waste materials at Aqua Clean's Lakeland facility.

3. All tanks and containers used to collect or store used oil must be clearly labeled with the words "Used Oil."

   Response: Aqua Clean labels all tanks and containers used to collect or store used oil with the words "Used Oil". At the time of the Department's inspection, containers had just been off-loaded from an Aqua Clean truck to the FRS facility

within the hour, and these materials had not yet been labeled as "Used Oil". Aqua Clean and FRS personnel have been trained to label these containers as quickly as possible with the words "Used Oil" and as soon as they are unloaded from transportation vehicles. All other tanks or containers operated or maintained by FRS to collect or store used oil are properly labeled with the words "Used Oil."

4. Please repair or reseal these areas and restore leachate control to prevent mixing with stormwater pursuant to Florida Administrative Code Chapter 62-701.710(3)b F.A.C.

   Response: Aqua Clean retained the services of a professional concrete contractor to strip, seal, and resurface both the inside and outside of the solidification pad containment wall. Aqua Clean has made a substantial investment in the solidification pad containment wall to address the Department's concerns with respect to potential cracking and minor staining. Please be advised that at no time were any leaks or releases observed from the walls of the containment pad.

5. Department recommends modifying the profile sheet to include language such as: "Is this material regulated under 40 CFR 279? Yes or No." Adding this line item will help clarify which oily waste waters are intended to be managed as used oil. If the materials are intended to be managed as used oil under 40 CFR 279, it should be manifested to FRS as the destination facility. The manifests reviewed during the inspection note ACE as the destination facility.

   Response: Pursuant to our discussions with the Department, Aqua Clean and FRS have agreed to modify their Material Data Certification Sheet to add the following language:

   > "Is this material being managed for recycling under 40 C.F.R. Part 279 ("EPA Used Oil Rule"). ☐ YES or ☐ NO."

   ACE has prepared a new manifest and certification document that will be used for the collection of used oil destined for recycling at FRS. This new document will include the statement referenced above requested by the Department. If materials are identified as used oil pursuant to 40 CFR Part 279, these materials will ultimately be manifested to FRS or transferred by ACE to FRS as the destination facility as opposed to Aqua Clean as the destination facility.

During our meeting with the Department on October 10, 2013, the Department requested information regarding the Cintas facilities serviced by Aqua Clean. Aqua Clean has provided voluminous documentation from its files to the Department regarding Non-Hazardous Waste Manifests, Material Data Certification Sheets and analytical test results obtained by Aqua Clean for multiple Cintas customer facilities.

Finally, the Department requested that Aqua Clean modify its recordkeeping procedures to allow its computer and invoicing system to allow Aqua Clean to match specific Non-

Hazardous Waste Manifests to a specific customer Material Data Certification Sheet. Please be advised that Aqua Clean has substantially expanded and modified its recordkeeping practices so that in the future it will be able to match and correlate specific Non-Hazardous Waste Manifests to a specific customer Material Data Certification Sheet for each customer wastewater stream or used oil from each customer.

We trust the information set forth above addresses all outstanding concerns from the Department's 2013 Compliance Inspection as well as all requested corrective actions set forth in the Department's Compliance Assistance Offer dated June 19, 2013. We remain available to meet with the Department as necessary to provide any additional information regarding these matters to document that Aqua Clean operates in full compliance with all applicable statutes and regulations administered by the Department. In the interim, please do not hesitate to contact me should you have any questions or concerns regarding the above matters or if the Department requires any additional information.

Sincerely yours,

FOWLER WHITE BOGGS P.A.

Ron H. Noble

cc: Ms. Susan Pelz
Mr. Mike Zellars

Florida Department of

Environmental Protection

Hazardous Waste Inspection Report

FACILITY INFORMATION:

Facility Name: Aqua Clean Environmental/Florida Recycling Solutions

On-Site Inspection Start Date: 04/15/2013 **On-Site Inspection End Date:** 04/15/2013

ME ID#: 21896 **EPA ID#:** FLR000034033

Facility Street Address: 3210 Whitten Rd, Lakeland, Florida 33811-1086

Contact Mailing Address: 3210 Whitten Rd, Lakeland, Florida 33811-1086

County Name: Polk **Contact Phone:** (863) 644-0665

NOTIFIED AS:

Non-Handler
Used Oil

INSPECTION TYPE:

Routine Inspection for Used Oil Processor facility

INSPECTION PARTICIPANTS:

Principal Inspector: Shannon D. Camp, Inspector

Other Participants: Mike Zellars, Plant Manager; Susan Pelz, Environmental Manager; Nancy Gaskin, Env. Eng.

LATITUDE / LONGITUDE: Lat 28° 0' 18.6604" / Long 82° 2' 33.4423"

SIC CODE: 7389 - Services - business services, nec

TYPE OF OWNERSHIP: Private

Introduction:

Aqua Clean Environmental (ACE)/Florida Recycling Solutions (FRS) was inspected on April 12, 2013, to determine the facility's compliance with state and federal hazardous waste and used oil regulations. ACE and FRS are sister corporations that share this facility and this EPA Identification Number. ACE is a registered transporter of used oil, used oil filters, and petroleum contact water (PCW). ACE also operates a Centralized Waste Pretreatment facility at this location that discharges to the City of Lakeland sewer system. FRS is a permitted used oil processor and receives used oil transported by ACE. FRS is also permitted to process oil contaminated debris.

Process Description:

ACE/FRS operations are discussed in detail in the facility's Used Oil and Material Processing Permit. Minor descrepancies in the permit and operations include: FRS currently only has and uses one boiler to burn on specification used oil incidently to processing used oil. The Annual Report by Used Oil and Used Oil Filter Handlers submitted to the Department by FRS for 2012 indicates that the facility only burned 321 gallons of on specification used oil in 2013.

The Department has received several complaints about off-site odors at the ACE/FRS facility. Department staff detected odors on-site during the inspection and discussed possible odor sources and current odor control measures taken onsite with facility staff. The Department requests that ACE/FRS provide information regarding on-going odor investigation and remediation efforts at the facility.

Excessive dust was also observed on site during this inspection. The Department requests that ACE/FRS employ a method of dust control, such as a screened cover, for the piles of sawdust stored on site to prevent off-site dust migration.

Inspection Date: 04/15/2013

New Potential Violations and Areas of Concern:

Violations

Type: Violation

Rule: 262.11

Explanation: Prior to the inspection, the facility was not conducting a proper waste determination on filter basket solids and tank bottoms generated from tanks 6,7,8 and 9. ACE/FRS was solidifying these wastes prior to testing to determine if they were characteristically toxic by analysis.

Corrective Action: ACE/FRS must conduct a proper waste determination on these materials as they are generated (prior to comingling or diluting with solidification materials). A proper waste determination includes analyzing the material by the Toxicity Characteristic Leaching Procedure for the eight RCRA heavy metals, volatile organic compounds and semi-volatiles.

Type: Violation

Rule: 403.727(1)(c)

Explanation: The facility failed to comply with the following conditions of the used oil and material processing permit:

Part IV.1.c&d: the facility was unable to demonstrate to the Department that the amount of non-hazardous oil contaminated solid waste accumulated on site at any given time does not exceed fifty 55-gallon drums (or equivalent volume) and three 35 cubic yard containers. In addition, the facility could not demonstrate that they had not exceeded the maximum permitted amount of oil contaminated solid waste that is to be brought into and processed at the facility outlined in the permit (720 cubic yards).

Part I.27 At the time of the inspection, the faciltiy was storing used oil in at least one 55-gallon drum in the used oil filter processing area. The permit does not allow for the storage of used oil outside the permitted tank system shown in Attachment A of the permit. In addition, it is unclear if this area has appropriate secondary containment.

Part IV: Facility records show receipt of potentially non-oil contaminated wastes at the facility such as clean-out fluff and sludge from Cintas industrial laundry. Facility staff indicated that these wastes were off-loaded directly onto the mixing pad or "moat" for solidification and disposal. The current facility waste processing and used oil processor permit authorizes the management of oil contaminated solid wastes only.

Corrective Action: The facility appears to manifest all solid waste, including the oil contaminated solid waste, to ACE only. Records provided during the inspection, along with discussions with facility personnel, indicate that all solid waste received, generated, or processed at the facility, including solid wastes generated from the industrial wastewater treatment portion of the facility are co-mingled and managed by ACE. Unless the facility (ACE/FRS) operations can be clearly distinguished, oil contaminated debris should be segregated on manifests in which FRS is the destination facility. The facility must maintain appropriate documentation that demonstrates that amount of this material on site and processed annually does not exceed the permit limits.

Please ensure only oil contaminated solid wastes are managed on the mixing

Please address your response and any questions to Susan Pelz of the Southwest District Office at (813) 632-7600, extension 336, or via e-mail at Susan.Pelz@dep.state.fl.us. We look forward to your cooperation with this matter.

Sincerely,

Brian J. Armstrong, PG
Assistant Director
Southwest District
Florida Department of Environmental Protection

BJA/ED/sdc/SP

Enclosures: Inspection Report

ec: Ron Noble, Fowler White (rnoble@fowlerwhite.com)

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

RICK SCOTT
GOVERNOR

HERSCHEL T. VINYARD JR.
SECRETARY

June 19, 2013

Mike Zellars, Vice President
Aqua Clean Environmental Co., Inc.
3210 Whitten Rd.
Lakeland, FL 33811
mszellars@acelkd.com

Re: Compliance Assistance Offer
Aqua Clean Environmental Co., Inc./Florida Recycling Solutions
FLR000034033
Polk County

Dear Mr. Zellars,

A Hazardous Waste Program inspection was conducted at your facility on April 15, 2013, under the authority of Sections 403.061, 403.141, 403.727, and 403.859 through 403.861, Florida Statutes (F.S.). During this inspection, possible violations of Chapter 403, F.S, Chapters 62-4, 62-160, 62-701, 62-710, 62-730, 62-740 and 62-762 of Florida Administrative Code (F.A.C.) were observed. The purpose of this letter is to offer you compliance assistance as a means of resolving these matters.

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

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

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

Inspection Date: 04/15/2013

pad. Alternatively, submit an application for a modification to the facility permit and operation plan to allow for other types of wastes to be managed at the facility.

Type: Violation

Rule: 62-710.401(6)

Explanation: At the time of the inspection, the facility was collecting used oil in multiple unlabeled containers. For example, the reservoirs beneath the used oil filter crusher were holding a large amount of used oil but were not labeled with the words "Used Oil." Also, several collection buckets were located within the tank containment system that were unlabeled.

Corrective Action: All tanks and containers used to collect or store used oil must be clearly labeled with the words "Used Oil."

Areas of Concern

Type: Area Of Concern

Rule: 403.727(1)(c)

Explanation: During the inspection, cracking and minor staining or seepage was observed along the base of the containment wall on the southern side of the "moat".

Corrective Action: Please repair or reseal these areas and restore leachate control to prevent mixing with stormwater pursuant to Florida Administrative Code Chapter 62-701.710(3)b F.A.C.

Type: Area Of Concern

Rule: 62-710.510(5)

Explanation: Review of the annual reports submitted by the facility (both ACE and FRS) for 2012 along with generator oily waste profiles indicates there are some discrepancies in characterizing "Used Oil." ACE's annual report indicates a large quantity of oily waste being solidified and landfilled. As FRS is the portion of the facility that is permitted to process this waste, this material should be included in FRS's annual report. Ideally, the only material ACE should be reporting on the Annual Report is the used oil that is transported from the generator to FRS (in addition to the PCW transported and processed). Several profiles of oily waste waters were reviewed and it was not clear if the material is "Used Oil" or was intended to be recycled by the generator pursuant to 40 CFR 279.

Corrective Action: Department recommends modifying the profile sheet to include language such as: "Is this material regulated under 40 CFR 279? Yes or No." Adding this line item will help clarify which oily waste waters are intended to be managed as used oil. If the materials are intended to be managed as used oil under 40 CFR 279, it should be manifested to FRS as the destination facility. The manifests reviewed during the inspection note ACE as the destination facility.

Inspection Date: 04/15/2013

Conclusion:

At the time of the inspection, Aqua Clean Environmental/Florida Recycling Solutions was not operating in compliance with state and federal used oil regulations and with their used oil processor permit. The Department requests that the facility contact the Southwest District Office to arrange for a meeting to discuss the findings of this inspection.

Inspection Date: 04/15/2013

Signed:

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

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

Shannon D. Camp
PRINCIPAL INSPECTOR NAME

Inspector
PRINCIPAL INSPECTOR TITLE

PRINCIPAL INSPECTOR SIGNATURE

5/6/2013
DATE

Supervisor: Erin DiBacco **Inspection Approval Date:** 06/17/2013

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

FOWLER WHITE BOGGS
Attorneys at Law
Est 1943

Ron H. Noble
Direct Dial: 813-222-1175
rnoble@fowlerwhite.com

December 20, 2013

Brian J. Armstrong, P.G.
Assistant Director
Florida Department of Environmental Protection
Southwest District
13051 N. Telelcom Parkway
Temple Terrace, FL 33637-0926

Re: Final Response of Aqua Clean Environmental Co., Inc. and Florida Recycling Solutions to FDEP Compliance Assistant Offer for Polk County facility

Dear Mr. Armstrong:

The purpose of this correspondence is to provide the additional information and final responses requested by the Florida Department of Environmental Protection ("Department") in connection with the Department's Compliance Assistance Offer issued to Aqua Clean Environmental Co., Inc. ("Aqua Clean") and Florida Recycling Solutions ("FRS") based upon the Department's compliance inspection on April 15, 2013. We met with representatives of the Department on August 29, 2013, and October 10, 2013, to discuss and resolve the issues set forth in the Department's Compliance Assistance Offer. Aqua Clean and FRS offer the following information and final responses as requested by the Department. For ease of reference, we have set forth below the Department's requested "Corrective Actions" followed by Aqua Clean's response in the same order as set forth in the Department's April 15, 2013, Inspection Report.

1. ACE/FRS must conduct a proper waste determination on these materials as they are generated (prior to comingling or diluting with solidification materials). A proper waste determination includes analyzing the material by the Toxicity Characteristic Leaching Procedure for the eight RCRA heavy metals, volatile organic compounds and semi-volatiles.

   Response: As previously discussed with the Department, the filter baskets at Aqua Clean have been removed and will no longer be utilized. Therefore, no waste materials will be generated from filter baskets and no waste characterization is required in connection with the historical use of the filter baskets. The Department also requested a waste characterization for tank bottom

waste materials generated by Aqua Clean and FRS. Pursuant to our discussions with the Department, if waste materials are generated from the bottoms of tanks 6, 7, 8 and/or 9, they will be analyzed for a proper waste determination and characterization utilizing TCLP analysis for metals and volatile organic compounds. The same protocol will be utilized for tanks 3, 4 and/or 5 in the event that tank bottom waste materials are generated from these tanks. As we discussed, minimal solids are generated from these tanks, and in the event that tank bottoms are removed, a proper waste determination and characterization will be performed quarterly for one year and annually thereafter as set forth above. Pursuant to our discussions with the District and FDEP in Tallahassee, combined tank bottoms will be tested from tanks 3, 4 and/or 5 as well as tanks 6, 7, 8 and/or 9 (2 separate sets of samples) for the waste determination and characterization protocols set forth above.

2. The facility appears to manifest all solid waste, including the oil contaminated solid waste, to ACE only. Records provided during the inspection, along with discussions with facility personnel, indicate that all solid waste received, generated, or processed at the facility, including solid wastes generated from the industrial wastewater treatment portion of the facility are co-mingled and managed by ACE. Unless the facility (ACE/FRS) operations can be clearly distinguished, oil contaminated debris should be segregated on manifests in which FRS is the destination facility. The facility must maintain appropriate documentation that demonstrates that the amount of this material on site and processed annually does not exceed the permit limits.

   Response: As we discussed with the Department, Aqua Clean and FRS have agreed that all materials going to the solidification pad will be categorized and characterized as an oily waste. If materials accepted by Aqua Clean do not go through the wastewater treatment process, these materials will be properly managed by ACE on the solidification pad prior to disposal. We agreed with the Department that oily waste materials managed by ACE in this manner are not subject to the conditions or limitations in the FRS Permit issued by the Department. Aqua Clean and FRS will maintain a separate tracking system and a separate log will be maintained to document any internal transfers so that a copy of the internal transfer log can be provided to the Department. As discussed with the Department, oily waste materials manifested to FRS will still be invoiced to the customer through Aqua Clean. Aqua Clean's Tampa facility is now permitted to accept Subpart A Metal Bearing Wastes, so there will be no need to process any Subpart A waste materials at Aqua Clean's Lakeland facility.

3. All tanks and containers used to collect or store used oil must be clearly labeled with the words "Used Oil."

   Response: Aqua Clean labels all tanks and containers used to collect or store used oil with the words "Used Oil". At the time of the Department's inspection, containers had just been off-loaded from an Aqua Clean truck to the FRS facility

within the hour, and these materials had not yet been labeled as "Used Oil". Aqua Clean and FRS personnel have been trained to label these containers as quickly as possible with the words "Used Oil" and as soon as they are unloaded from transportation vehicles. All other tanks or containers operated or maintained by FRS to collect or store used oil are properly labeled with the words "Used Oil."

4. Please repair or reseal these areas and restore leachate control to prevent mixing with stormwater pursuant to Florida Administrative Code Chapter 62-701.710(3)b F.A.C.

   Response: Aqua Clean retained the services of a professional concrete contractor to strip, seal, and resurface both the inside and outside of the solidification pad containment wall. Aqua Clean has made a substantial investment in the solidification pad containment wall to address the Department's concerns with respect to potential cracking and minor staining. Please be advised that at no time were any leaks or releases observed from the walls of the containment pad.

5. Department recommends modifying the profile sheet to include language such as: "Is this material regulated under 40 CFR 279? Yes or No." Adding this line item will help clarify which oily waste waters are intended to be managed as used oil. If the materials are intended to be managed as used oil under 40 CFR 279, it should be manifested to FRS as the destination facility. The manifests reviewed during the inspection note ACE as the destination facility.

   Response: Pursuant to our discussions with the Department, Aqua Clean and FRS have agreed to modify their Material Data Certification Sheet to add the following language:

   > "Is this material being managed for recycling under 40 C.F.R. Part 279 ("EPA Used Oil Rule"). ☐ YES or ☐ NO."

   ACE has prepared a new manifest and certification document that will be used for the collection of used oil destined for recycling at FRS. This new document will include the statement referenced above requested by the Department. If materials are identified as used oil pursuant to 40 CFR Part 279, these materials will ultimately be manifested to FRS or transferred by ACE to FRS as the destination facility as opposed to Aqua Clean as the destination facility.

During our meeting with the Department on October 10, 2013, the Department requested information regarding the Cintas facilities serviced by Aqua Clean. Aqua Clean has provided voluminous documentation from its files to the Department regarding Non-Hazardous Waste Manifests, Material Data Certification Sheets and analytical test results obtained by Aqua Clean for multiple Cintas customer facilities.

Finally, the Department requested that Aqua Clean modify its recordkeeping procedures to allow its computer and invoicing system to allow Aqua Clean to match specific Non-

Hazardous Waste Manifests to a specific customer Material Data Certification Sheet. Please be advised that Aqua Clean has substantially expanded and modified its recordkeeping practices so that in the future it will be able to match and correlate specific Non-Hazardous Waste Manifests to a specific customer Material Data Certification Sheet for each customer wastewater stream or used oil from each customer.

We trust the information set forth above addresses all outstanding concerns from the Department's 2013 Compliance Inspection as well as all requested corrective actions set forth in the Department's Compliance Assistance Offer dated June 19, 2013. We remain available to meet with the Department as necessary to provide any additional information regarding these matters to document that Aqua Clean operates in full compliance with all applicable statutes and regulations administered by the Department. In the interim, please do not hesitate to contact me should you have any questions or concerns regarding the above matters or if the Department requires any additional information.

Sincerely yours,

FOWLER WHITE BOGGS P.A.

Ron H. Noble

cc: Ms. Susan Pelz
Mr. Mike Zellars

DEPARTMENT OF ENVIRONMENTAL PROTECTION

Mail Station 4560, 2600 Blair Stone Road, Tallahassee, Florida 32399-2400

DEP Form #62-710.901(3)
Form Title Annual Report by Used Oil and Used Oil Filter Handlers
Effective Date 4-23-13
Incorporated in Rule 62-710.510(5)

Annual Report by Used Oil and Used Oil Filter Handlers*

(*Handlers are any persons subject to the registration requirements of rule 62-710.500 and 62-710.850, F.A.C. See Section A, Box 5 below.)

For the reporting period January 1, 2013 through December 31, 2013

Use the information recorded in your **Record Keeping Form [62-710.901(2)]** or equivalent to complete this document.

SECTION A TO BE COMPLETED BY ALL REGISTERED PERSONS

1. Company Name: Florida Recycling Solutions LLC 2. Telephone No. (863) 644-0665

Site Address: 3210 Whitten Rd Lakeland FL 33811

3. EPA ID No. FLR000034033

☐ Check box if any of the above items (1-3) have changed since your last registration.

4. Name of person preparing report (please print) Mike Zellars

Title: Vice President/GM Phone number (if different from #2, above) ( )

5. Type of operation (check as many as apply to your operations)

Used Oil: ☐ Transporter ☐ Transfer Facility ☐ Collection Center/Aggregation Point ☒ Processor ☐ Marketer ☐ Burner (of off-specification used oil)

Used Oil Filter: ☐ Transporter ☒ Transfer Facility ☒ Processor ☐ End User

SECTION B USED OIL (TO BE COMLETED BY ALL REGISTERED USED OIL HANDLERS. USED OIL FILTER HANDLERS SEE SECTION C)

1. Amount (in gallons) of Used Oil and Oily Wastes collected (type code)	Automotive	Industrial	Mixed	Total
a. In Florida	0	0	478930	478930
b. From out of State	0	0	0	0
c. Beginning Inventory				21875
d. Total (sum of totals from Lines a + b + c)				500805

2. Amount (in gallons) of Used Oil and Oily Wastes managed (end use code)	In State	Out of State
N - Transferred to another facility (not an end use)	0	0
O - Marketed as an on-specification used oil fuel	442186	0
F - Marketed as an off-specification used oil fuel	0	0
I - Marketed for an industrial process	0	0
B - Burned as an off-specification used oil fuel	0	0
D- Disposed of: Landfilled	0	0
Treated at a wastewater treatment unit	31,916	0
Incinerated	0	0
3. Total amount (in gallons) of Used Oil managed	474855	0
4. End of year, on hand estimate (difference between Line 1d and Line 3)	25950	0

Burned as ON Specification Used Oil fuel: 753

DEP Form	#62-710.901(3)
Form Title	Annual Report by Used Oil and Used Oil Filter Handlers
Effective Date	4-23-13
Incorporated in Rule	62-710.510(5)

SECTION C USED OIL FILTERS (OPTIONAL) (USE TABLE BELOW FOR CONVERSIONS)	CHECK COLUMN IF OUT OF STATE ↓	
1. Number of filters on hand from previous year	29637	☐
2. Number of used oil filters collected	237460	☐
3. Total number of used oil filters to manage (Line 1 plus Line 2)	267097	☐
4. Disposition of used oil filters collected: a. Transferred to another registered facility	0	☐
b. Burned for energy recovery at a Waste-To-Energy facility	0	☐
c. Transferred directly to a metal foundry for recycling	136535	☐
d. TOTAL	136535	☐
5. End of year, on hand estimate (Line 3 minus Line 4d)	130562	☐
6. Gallons of used oil collected as a result of filter processing	2455	☐
7. Gallons of used oil transferred to a used oil handler (transporter or processor)	2455	☐
8. Volume of oily waste collected and managed as a result of filter processing ☐ gallons ☐ cubic yards	0	☐

9. Description of oily waste management _____

DIRECTIONS FOR SECTION C

Conversion Table

One 55-gallon drum of **crushed** used oil filters = approximately **400** used oil filters
One 55- gallon drum of **uncrushed** used oil filters = approximately **250** used oil filters
One **ton** of drained used oil filters = approximately **2,350** used oil filters

1. Enter the number of Used Oil Filters on hand, from previous year's inventory.
2. Enter the number of Used Oil Filters collected.
3. Enter the sum of Line 1 + Line 2.
4. Enter the number of filters managed by your facility in blocks 4a-c. Enter the sum of 4a-c in block 4d.
5. Enter the number of filters on hand at your site as of December 31, last year.
6. Fill in the number of gallons of used oil collected by your filter operation.
7. Enter the number of gallons transferred to a used oil transporter or processor.
8. List the volume (gallons or cubic yards) of the oily wastes collected through your filter handling. Oily wastes are identified in Florida Administrative Code Rule 62-710.201(1), and include wastewaters, filter residues or sludges, tank bottoms, sorbents, wipes, etc.
9. Describe how oily wastes were managed (sent to a WTE, hazardous waste facility, landfilled after appropriate testing, etc.).

For assistance with this form, please call the Used Oil Coordinator at 850-245-8707.

FLORIDA RECYCLING SOLUTIONS, LLC

January 31, 2014

Ms. Janet Ashwood
Department of Waste Management-HWRS
2600 Blair Stone Road MS 4560
Tallahassee, Florida 32399-2400

Dear Ms. Ashwood,

Please accept the enclosed as our report of used oil and oily waste received or transferred during the year of 2013.

We received 478,930 gallons of used oil during the year of 2013.

We received approximately 237,460 used oil filters during the year of 2013.

Please feel free to contact my office should you have any questions.

Sincerely,

Mike Zellars
Vice President
General Manager

Enclosures: 2013 Used Oil/Oily Waste Report

Phone: (800) 644-0665 • Fax: (863) 646-1880
3210 Whitten Road • Lakeland, Florida 33811

DEPARTMENT OF ENVIRONMENTAL PROTECTION

Mail Station 4560, 2600 Blair Stone Road, Tallahassee, Florida 32399-2400

DEP Form #62-710.901(3)
Form Title Annual Report by Used Oil and Used Oil Filter Handlers
Effective Date 4-23-13
Incorporated in Rule 62-710.510(5)

Annual Report by Used Oil and Used Oil Filter Handlers*

(*Handlers are any persons subject to the registration requirements of rule 62-710.500 and 62-710.850, F.A.C. See Section A, Box 5 below.)

For the reporting period January 1, 2013 through December 31, 2013

Use the information recorded in your **Record Keeping Form [62-710.901(2)]** or equivalent to complete this document.

SECTION A TO BE COMPLETED BY ALL REGISTERED PERSONS

1. Company Name: Aqua Clean Environmental Co Inc 2. Telephone No. (863-644-0665

Site Address: 3510 Whitten Rd Lakeland FL 33811

3. EPA ID No. FLR000034033

☐ Check box if any of the above items (1-3) have changed since your last registration.

4. Name of person preparing report (please print) Mike Zellars

Title: Vice President Phone number (if different from #2, above) (863 644 0665

5. Type of operation (check as many as apply to your operations)

Used Oil: ☒ Transporter ☒ Transfer Facility ☐ Collection Center/Aggregation Point ☐ Processor ☐ Marketer ☐ Burner (of off-specification used oil)

Used Oil Filter: ☒ Transporter ☒ Transfer Facility ☐ Processor ☐ End User

SECTION B USED OIL (TO BE COMLETED BY ALL REGISTERED USED OIL HANDLERS. USED OIL FILTER HANDLERS SEE SECTION C)

1. Amount (in gallons) of Used Oil and Oily Wastes collected (type code)	Automotive	Industrial	Mixed	Total
a. In Florida	0	0	1186265	1186265
b. From out of State	0	0	0	0
c. Beginning Inventory				0
d. Total (sum of totals from Lines a + b + c)				1186265

2. Amount (in gallons) of Used Oil and Oily Wastes managed (end use code)	In State	Out of State
N - Transferred to another facility (not an end use)	478930	0
O - Marketed as an on-specification used oil fuel	0	0
F - Marketed as an off-specification used oil fuel	0	0
I - Marketed for an industrial process	0	0
B - Burned as an off-specification used oil fuel	0	0
D- Disposed of: Landfilled	707335	0
Treated at a wastewater treatment unit	0	0
Incinerated	0	0
3. Total amount (in gallons) of Used Oil managed	1186265	0
4. End of year, on hand estimate (difference between Line 1d and Line 3)	0	0

DEP Form	#62-710.901(3)
Form Title	Annual Report by Used Oil and Used Oil Filter Handlers
Effective Date	4-23-13
Incorporated in Rule	62-710.510(5)

SECTION C USED OIL FILTERS (OPTIONAL) (USE TABLE BELOW FOR CONVERSIONS)	CHECK COLUMN IF OUT OF STATE ↓	
1. Number of filters on hand from previous year	0	☐
2. Number of used oil filters collected	237460	☐
3. Total number of used oil filters to manage (Line 1 plus Line 2)	237460	☐
4. Disposition of used oil filters collected: a. Transferred to another registered facility	237460	☐
b. Burned for energy recovery at a Waste-To-Energy facility		☐
c. Transferred directly to a metal foundry for recycling		☐
d. TOTAL	237460	☐
5. End of year, on hand estimate (Line 3 minus Line 4d)	0	☐
6. Gallons of used oil collected as a result of filter processing	0	☐
7. Gallons of used oil transferred to a used oil handler (transporter or processor)	0	☐
8. Volume of oily waste collected and managed as a result of filter processing ☐ gallons ☐ cubic yards	0	☐

9. Description of oily waste management _____

DIRECTIONS FOR SECTION C

Conversion Table

One 55-gallon drum of **crushed** used oil filters = approximately **400** used oil filters
One 55- gallon drum of **uncrushed** used oil filters = approximately **250** used oil filters
One **ton** of drained used oil filters = approximately **2,350** used oil filters

1. Enter the number of Used Oil Filters on hand, from previous year's inventory.
2. Enter the number of Used Oil Filters collected.
3. Enter the sum of Line 1 + Line 2.
4. Enter the number of filters managed by your facility in blocks 4a-c. Enter the sum of 4a-c in block 4d.
5. Enter the number of filters on hand at your site as of December 31, last year.
6. Fill in the number of gallons of used oil collected by your filter operation.
7. Enter the number of gallons transferred to a used oil transporter or processor.
8. List the volume (gallons or cubic yards) of the oily wastes collected through your filter handling. Oily wastes are identified in Florida Administrative Code Rule 62-710.201(1), and include wastewaters, filter residues or sludges, tank bottoms, sorbents, wipes, etc.
9. Describe how oily wastes were managed (sent to a WTE, hazardous waste facility, landfilled after appropriate testing, etc.).

For assistance with this form, please call the Used Oil Coordinator at 850-245-8707.

Aqua Clean
Environmental Co., Inc.

January 31, 2014

Ms. Janet Ashwood
Department of Waste Management-HWRS
2600 Blair Stone Road MS 4560
Tallahassee, Florida 32399-2400

Dear Ms. Ashwood,

Please accept this as our report of oily waste received or transferred during the year of 2013.

We received 707335 gallons of oily waste during the year of 2013.

Also enclosed is the renewal fee of $100.00 covering Aqua Clean Environmental Co., Inc and Florida Recycling Solutions, LLC.

Aqua Clean's Used Oil Transporter Training Manual has previously been submitted and approved. The training program is still operating and it is being adhered to. There have been no changes to the Used Oil Transporter Training Manual.

Sincerely,

Mike Zellars
Vice President
General Manager

Enclosures: Check #3913 in the amount of $100.00
2013 Oily Waste Report

3210 Whitten Road • Lakeland, Florida 33811
Telephone (863) 644-0665 • Toll Free (800) 644-0665 • Fax (863) 646-1880 • www.acelkd.com

Analytical Report 523247

for

Diversified Environmental Services

Project Manager: Gerry McCormick

Quarterly

27-JAN-16

Collected By: Client

Florida Testing Services DBA Xenco Laboratories
5675 New Tampa HWY

Xenco-Houston (EPA Lab code: TX00122):
Texas (T104704215-15-19), Arizona (AZ0765), Florida (E871002), Louisiana (03054)
Oklahoma (9218)

Xenco-Dallas (EPA Lab code: TX01468): Texas (T104704295)
Xenco-Odessa (EPA Lab code: TX00158): Texas (T104704400)
Xenco-San Antonio: Texas (T104704534-15-1)
~~Xenco Phoenix (EPA Lab Code: AZ00901): Arizona(AZ0757)~~
Xenco-Phoenix Mobile (EPA Lab code: AZ00901): Arizona (AZM757)
Xenco-Atlanta (EPA Lab Code: GA00046):
Florida (E87429), North Carolina (483), South Carolina (98015), Kentucky (85), DoD (L10-135)
Texas (T104704477), Louisiana (04176), USDA (P330-07-00105)

Xenco-Lakeland: Florida (E84098)

27-JAN-16

Project Manager: **Gerry McCormick**
Diversified Environmental Services
1201 N 22nd Street
Tampa, FL 33605

Reference: XENCO Report No(s): **523247**
Quarterly
Project Address: FL

Gerry McCormick:

We are reporting to you the results of the analyses performed on the samples received under the project name referenced above and identified with the XENCO Report Number(s) 523247. All results being reported under this Report Number apply to the samples analyzed and properly identified with a Laboratory ID number. Subcontracted analyses are identified in this report with either the NELAC certification number of the subcontract lab in the analyst ID field, or the complete subcontracted report attached to this report.

Unless otherwise noted in a Case Narrative, all data reported in this Analytical Report are in compliance with NELAC standards. The uncertainty of measurement associated with the results of analysis reported is available upon request. Should insufficient sample be provided to the laboratory to meet the method and NELAC Matrix Duplicate and Matrix Spike requirements, then the data will be analyzed, evaluated and reported using all other available quality control measures.

The validity and integrity of this report will remain intact as long as it is accompanied by this letter and reproduced in full, unless written approval is granted by XENCO Laboratories. This report will be filed for at least 5 years in our archives after which time it will be destroyed without further notice, unless otherwise arranged with you. The samples received, and described as recorded in Report No. 523247 will be filed for 60 days, and after that time they will be properly disposed without further notice, unless otherwise arranged with you. We reserve the right to return to you any unused samples, extracts or solutions related to them if we consider so necessary (e.g., samples identified as hazardous waste, sample sizes exceeding analytical standard practices, controlled substances under regulated protocols, etc).

We thank you for selecting XENCO Laboratories to serve your analytical needs. If you have any questions concerning this report, please feel free to contact us at any time.

Respectfully,

Amy Atkins

Amy Atkins
Project Manager

Recipient of the Prestigious Small Business Administration Award of Excellence in 1994.
Certified and approved by numerous States and Agencies.
A Small Business and Minority Status Company that delivers SERVICE and QUALITY

Houston - Dallas - Odessa - San Antonio - Tampa - Lakeland - Atlanta - Phoenix - Oklahoma - Latin America

Sample Cross Reference 523247

Diversified Environmental Services, Tampa, FL

Quarterly

Sample Id	Matrix	Date Collected	Sample Depth	Lab Sample Id
Quarterly 001	W	01-20-16 08:30		523247-001

CASE NARRATIVE

Client Name: Diversified Environmental Services
Project Name: Quarterly

Project ID: *001*
Work Order Number(s): *523247*

Report Date: *27-JAN-16*
Date Received: *01/20/2016*

Sample receipt non conformances and comments:

Sample receipt non conformances and comments per sample:

None

Analytical non conformances and comments:

Batch: LBA-986197 VOAs by EPA 624

Acrolein recovered above QC limits in the Blank Spike and Duplicate. Analyte was not detected in any of the associated samples and therefore the data was accepted. Samples in the analytical batch are: 523247-001.

Batch: LBA-986242 SVOCs by EPA 625

m-Cresol and p-Cresol cannot be resolved from one another under EPA 625/8270. When a positive hit is detected for one, it may be any mixture of the two isomers

Hits Summary 523247

Diversified Environmental Services, Tampa, FL

Quarterly

Below is a summary of the analytes which were found to be present in the samples associated with this work order. This should only be used in conjunction with the included analytical results.

Sample ID: Quarterly 001 **Sample ID: 523247-001** **Date/Time Sampled: 01/20/2016 08:30** **Matrix: Water**

Analyte Name	*Method*	*CAS No.*	*Dil.*	*Result*	*RL/PQL*	*MDL*	*Units*	*Qual.*
Benzene	EPA624	71-43-2	1	20.2	1.00	0.160	ug/L	
Carbazole +	E625	86-74-8	1	0.000850	0.00500	0.000231	mg/L	I
Chloride	E300.0	16887-00-6	10	1350	50.0	1.04	mg/L	
Chromium	E200.7	7440-47-3	1	0.00230	0.0500	0.000300	mg/L	VI
Copper	E200.7	7440-50-8	1	0.00760	0.0500	0.00110	mg/L	I
Ethylbenzene	EPA624	100-41-4	1	2.14	1.00	0.190	ug/L	
Nickel	E200.7	7440-02-0	1	0.0244	0.0100	0.00170	mg/L	
Titanium	E200.7	7440-32-6	1	0.00110	0.0500	0.000960	mg/L	I
Toluene	EPA624	108-88-3	1	5.81	1.00	0.140	ug/L	V
Total BTEX	EPA624		1	47.2	1.00	0.140	ug/L	
Total Xylenes	EPA624	1330-20-7	1	19.1	1.00	0.200	ug/L	
Total dissolved solids	SM2540C	TDS	1	3000	5.00	1.78	mg/L	
Vanadium	E200.7	7440-62-2	1	0.00950	0.0100	0.000800	mg/L	I
Zinc	E200.7	7440-66-6	1	0.218	0.100	0.000900	mg/L	
m,p-Xylenes	EPA624	179601-23-1	1	8.06	2.00	0.510	ug/L	V
o-Xylene	EPA624	95-47-6	1	11.0	1.00	0.200	ug/L	
pH	SM4500-H+	12408-02-5	1	7.27			SU	Q

Certificate of Analytical Results 523247

Diversified Environmental Services, Tampa, FL

Quarterly

Sample Id: **Quarterly 001**
Lab Sample Id: 523247-001

Matrix: Waste Water
Date Collected: 01.20.16 08.30

Date Received:01.20.16 12.35

Analytical Method: Inorganic Anions by EPA 300
Tech: NSI
Analyst: NSI
Seq Number: 986233

% Moisture:

SUB: E87429

Parameter	Cas Number	Result	PQL	MDL	Flag	Units	Analysis Date	Dil
Chloride	16887-00-6	**1350**	50.0	1.04		mg/L	01.22.16 13.28	10

Analytical Method: TDS by SM2540C
Tech: RBC
Analyst: RBC
Seq Number: 986238

% Moisture:

Parameter	Cas Number	Result	PQL	MDL	Flag	Units	Analysis Date	Dil
Total dissolved solids	TDS	**3000**	5.00	1.78		mg/L	01.21.16 14.30	1

Analytical Method: pH by SM4500-H+ B
Tech: RBC
Analyst: RBC
Seq Number: 986014

% Moisture:

Parameter	Cas Number	Result	PQL	MDL	Flag	Units	Analysis Date	Dil
pH	12408-02-5	7.27			Q	SU	01.20.16 16.55	1

Certificate of Analytical Results 523247

Diversified Environmental Services, Tampa, FL

Quarterly

Sample Id: **Quarterly 001** Matrix: Waste Water Date Received:01.20.16 12.35

Lab Sample Id: 523247-001 Date Collected: 01.20.16 08.30

Analytical Method: Metals per ICP by EPA 200.7 Prep Method: E200.7P

Tech: ABA % Moisture:

Analyst: 4150 Date Prep: 01.22.16 06.06

Seq Number: 986162 SUB: E87429

Parameter	Cas Number	Result	PQL	MDL	Flag	Units	Analysis Date	Dil
Antimony	7440-36-0	U	0.0100	0.00500	U	mg/L	01.22.16 12.42	1
Arsenic	7440-38-2	U	0.0100	0.00400	U	mg/L	01.22.16 12.42	1
Cadmium	7440-43-9	U	0.00500	0.000300	U	mg/L	01.22.16 12.42	1
Chromium	7440-47-3	**0.00230**	0.0500	0.000300	VI	mg/L	01.22.16 12.42	1
Cobalt	7440-48-4	U	0.0100	0.000900	U	mg/L	01.22.16 12.42	1
Copper	7440-50-8	**0.00760**	0.0500	0.00110	I	mg/L	01.22.16 12.42	1
Lead	7439-92-1	U	0.0100	0.00330	U	mg/L	01.22.16 12.42	1
Nickel	7440-02-0	**0.0244**	0.0100	0.00170		mg/L	01.22.16 12.42	1
Silver	7440-22-4	U	0.0500	0.000600	U	mg/L	01.22.16 12.42	1
Tin	7440-31-5	U	0.0500	0.00560	U	mg/L	01.22.16 12.42	1
Titanium	7440-32-6	**0.00110**	0.0500	0.000960	I	mg/L	01.22.16 12.42	1
Vanadium	7440-62-2	**0.00950**	0.0100	0.000800	I	mg/L	01.22.16 12.42	1
Zinc	7440-66-6	**0.218**	0.100	0.000900		mg/L	01.22.16 12.42	1

Analytical Method: Mercury, Total by EPA 245.1 Prep Method: E245.1P

Tech: ABA % Moisture:

Analyst: 4150 Date Prep: 01.22.16 06.06

Seq Number: 986155 SUB: E87429

Parameter	Cas Number	Result	PQL	MDL	Flag	Units	Analysis Date	Dil
Mercury	7439-97-6	U	0.00200	0.0000101	U	mg/L	01.22.16 11.18	1

Certificate of Analytical Results 523247

Diversified Environmental Services, Tampa, FL

Quarterly

Sample Id: **Quarterly 001** Matrix: Waste Water Date Received:01.20.16 12.35

Lab Sample Id: 523247-001 Date Collected: 01.20.16 08.30

Analytical Method: SVOCs by EPA 625 Prep Method: E625P

Tech: BRO % Moisture:

Analyst: VIC Date Prep: 01.21.16 12.10

Seq Number: 986242 SUB: E87429

Parameter	Cas Number	Result	PQL	MDL	Flag	Units	Analysis Date	Dil
2,4,6-Trichlorophenol	88-06-2	U	0.0100	0.00164	U	mg/L	01.22.16 15.45	1
bis(2-ethylhexyl) phthalate	117-81-7	U	0.0100	0.00120	U	mg/L	01.22.16 15.45	1
Fluoranthene	206-44-0	U	0.0100	0.00181	U	mg/L	01.22.16 15.45	1
n-Decane	124-18-5	U	0.0100	0.00200	U	mg/L	01.22.16 15.45	1
2-methylphenol	95-48-7	U	0.0100	0.00200	U	mg/L	01.22.16 15.45	1
3&4-Methylphenol	15831-10-4	U	0.0200	0.00255	U	mg/L	01.22.16 15.45	1
n-Octadecane	593-45-3	U	0.0100	0.00200	U	mg/L	01.22.16 15.45	1
Carbazole	86-74-8	**0.000850**	0.00500	0.000231	I	mg/L	01.22.16 15.45	1

Surrogate	Cas Number	% Recovery	Units	Limits	Analysis Date	Flag
2-Fluorophenol	367-12-4	65	%	30-100	01.22.16 15.45	
2-Fluorobiphenyl	321-60-8	74	%	44-117	01.22.16 15.45	
2,4,6-Tribromophenol	118-79-6	86	%	48-127	01.22.16 15.45	
Nitrobenzene-d5	4165-60-0	69	%	46-111	01.22.16 15.45	
Phenol-d5	4165-62-2	64	%	50-200	01.22.16 15.45	
Terphenyl-D14	1718-51-0	94	%	46-126	01.22.16 15.45	

Certificate of Analytical Results 523247

Diversified Environmental Services, Tampa, FL

Quarterly

Sample Id: **Quarterly 001** Matrix: Waste Water Date Received:01.20.16 12.35

Lab Sample Id: 523247-001 Date Collected: 01.20.16 08.30

Analytical Method: VOAs by EPA 624 Prep Method: E624P

Tech: MWE % Moisture:

Analyst: ZHO Date Prep: 01.21.16 20.27

Seq Number: 986197 SUB: E87429

Parameter	Cas Number	Result	PQL	MDL	Flag	Units	Analysis Date	Dil
Acrolein	107-02-8	U	20.0	3.50	UJH	ug/L	01.22.16 11.46	1
Acrylonitrile	107-13-1	U	2.00	0.490	U	ug/L	01.22.16 11.46	1
Benzene	71-43-2	**20.2**	1.00	0.160		ug/L	01.22.16 11.46	1
Bromodichloromethane	75-27-4	U	1.00	0.250	U	ug/L	01.22.16 11.46	1
Bromoform	75-25-2	U	1.00	0.170	U	ug/L	01.22.16 11.46	1
Methyl bromide	74-83-9	U	1.00	0.250	U	ug/L	01.22.16 11.46	1
MTBE	1634-04-4	U	2.00	0.180	U	ug/L	01.22.16 11.46	1
Carbon Tetrachloride	56-23-5	U	1.00	0.330	U	ug/L	01.22.16 11.46	1
Chlorobenzene	108-90-7	U	1.00	0.150	U	ug/L	01.22.16 11.46	1
Chloroethane	75-00-3	U	1.00	0.260	U	ug/L	01.22.16 11.46	1
2-Chloroethyl Vinyl Ether	110-75-8	U	1.00	0.290	U	ug/L	01.22.16 11.46	1
Chloroform	67-66-3	U	1.00	0.160	U	ug/L	01.22.16 11.46	1
Methyl Chloride	74-87-3	U	1.00	0.250	U	ug/L	01.22.16 11.46	1
Dibromochloromethane	124-48-1	U	1.00	0.150	U	ug/L	01.22.16 11.46	1
1,2-Dichlorobenzene	95-50-1	U	1.00	0.140	U	ug/L	01.22.16 11.46	1
1,3-Dichlorobenzene	541-73-1	U	1.00	0.170	U	ug/L	01.22.16 11.46	1
1,4-Dichlorobenzene	106-46-7	U	1.00	0.170	U	ug/L	01.22.16 11.46	1
Dichlorodifluoromethane	75-71-8	U	0.00500	0.00100	U	mg/L	01.22.16 11.46	1
1,2-Dichloroethane	107-06-2	U	1.00	0.180	U	ug/L	01.22.16 11.46	1
1,1-Dichloroethane	75-34-3	U	1.00	0.110	U	ug/L	01.22.16 11.46	1
trans-1,2-dichloroethylene	156-60-5	U	1.00	0.210	U	ug/L	01.22.16 11.46	1
cis-1,2-Dichloroethylene	156-59-2	U	0.00500	0.00100	U	mg/L	01.22.16 11.46	1
1,1-Dichloroethene	75-35-4	U	1.00	0.200	U	ug/L	01.22.16 11.46	1
1,2-Dichloropropane	78-87-5	U	1.00	0.150	U	ug/L	01.22.16 11.46	1
trans-1,3-dichloropropene	10061-02-6	U	1.00	0.110	U	ug/L	01.22.16 11.46	1
cis-1,3-Dichloropropene	10061-01-5	U	1.00	0.100	U	ug/L	01.22.16 11.46	1
Ethylbenzene	100-41-4	**2.14**	1.00	0.190		ug/L	01.22.16 11.46	1
1,1,2,2-Tetrachloroethane	79-34-5	U	1.00	0.180	U	ug/L	01.22.16 11.46	1
Toluene	108-88-3	**5.81**	1.00	0.140	V	ug/L	01.22.16 11.46	1
1,1,2-Trichloroethane	79-00-5	U	1.00	0.250	U	ug/L	01.22.16 11.46	1
1,1,1-Trichloroethane	71-55-6	U	1.00	0.160	U	ug/L	01.22.16 11.46	1
o-Xylene	95-47-6	**11.0**	1.00	0.200		ug/L	01.22.16 11.46	1
m,p-Xylenes	179601-23-1	**8.06**	2.00	0.510	V	ug/L	01.22.16 11.46	1
Methylene Chloride	75-09-2	U	1.00	0.420	U	ug/L	01.22.16 11.46	1
Total BTEX		**47.2**	1.00	0.140		ug/L	01.22.16 11.46	1
Total Xylenes	1330-20-7	**19.1**	1.00	0.200		ug/L	01.22.16 11.46	1
Tetrachloroethylene	127-18-4	U	1.00	0.160	U	ug/L	01.22.16 11.46	1

Certificate of Analytical Results 523247

Diversified Environmental Services, Tampa, FL

Quarterly

Sample Id: **Quarterly 001**
Lab Sample Id: 523247-001

Matrix: Waste Water
Date Collected: 01.20.16 08.30

Date Received:01.20.16 12.35

Analytical Method: VOAs by EPA 624
Tech: MWE
Analyst: ZHO
Seq Number: 986197

Date Prep: 01.21.16 20.27

Prep Method: E624P
% Moisture:

SUB: E87429

Surrogate	Cas Number	% Recovery	Units	Limits	Analysis Date	Flag
4-Bromofluorobenzene	460-00-4	105	%	30-186	01.22.16 11.46	
1,2-Dichloroethane-D4	17060-07-0	146	%	53-159	01.22.16 11.46	
Toluene-D8	2037-26-5	112	%	70-130	01.22.16 11.46	

XENCO Laboratories
CHRONOLOGY OF HOLDING TIMES

Analytical Method : Metals per ICP by EPA 200.7 **Client :** Diversified Environmental Services

Work Order #: 523247 **Project ID:**

Field Sample ID	Date Collected	Date Received	Date Extracted	Max Holding Time Extracted (Days)	Time Held Extracted (Days)	Date Analyzed	Max Holding Time Analyzed (Days)	Time Held Analyzed (Days)	Q
Quarterly 001	Jan. 20, 2016	Jan. 20, 2016				Jan.22, 2016	180	2	P

Analytical Method : Mercury, Total by EPA 245.1 Client : Diversified Environmental Services

Work Order #: 523247 Project ID:

Field Sample ID	Date Collected	Date Received	Date Extracted	Max Holding Time Extracted (Days)	Time Held Extracted (Days)	Date Analyzed	Max Holding Time Analyzed (Days)	Time Held Analyzed (Days)	Q
Quarterly 001	Jan. 20, 2016	Jan. 20, 2016				Jan.22, 2016	28	2	P

XENCO Laboratories
CHRONOLOGY OF HOLDING TIMES

Analytical Method : Inorganic Anions by EPA 300 Client : Diversified Environmental Services

Work Order #: 523247 Project ID:

Field Sample ID	Date Collected	Date Received	Date Extracted	Max Holding Time Extracted (Days)	Time Held Extracted (Days)	Date Analyzed	Max Holding Time Analyzed (Days)	Time Held Analyzed (Days)	Q
Quarterly 001	Jan. 20, 2016	Jan. 20, 2016				Jan.22, 2016	28	2	P

FTS ANALYTICAL SERVICES

XENCO Laboratories
CHRONOLOGY OF HOLDING TIMES

Analytical Method : VOAs by EPA 624

Client : Diversified Environmental Services

Work Order #: 523247

Project ID:

Field Sample ID	Date Collected	Date Received	Date Extracted	Max Holding Time Extracted (Days)	Time Held Extracted (Days)	Date Analyzed	Max Holding Time Analyzed (Days)	Time Held Analyzed (Days)	Q
Quarterly 001	Jan. 20, 2016	Jan. 20, 2016				Jan.22, 2016	7	2	P

FTS ANALYTICAL SERVICES

XENCO Laboratories
CHRONOLOGY OF HOLDING TIMES

Analytical Method : SVOCs by EPA 625

Client : Diversified Environmental Services

Work Order #: 523247

Project ID:

Field Sample ID	Date Collected	Date Received	Date Extracted	Max Holding Time Extracted (Days)	Time Held Extracted (Days)	Date Analyzed	Max Holding Time Analyzed (Days)	Time Held Analyzed (Days)	Q
Quarterly 001	Jan. 20, 2016	Jan. 20, 2016	Jan. 21, 2016	7	1	Jan.22, 2016	40	1	P

FTS ANALYTICAL SERVICES

XENCO Laboratories
CHRONOLOGY OF HOLDING TIMES

Analytical Method : TDS by SM2540C

Client : Diversified Environmental Services

Work Order #: 523247

Project ID:

Field Sample ID	Date Collected	Date Received	Date Extracted	Max Holding Time Extracted (Days)	Time Held Extracted (Days)	Date Analyzed	Max Holding Time Analyzed (Days)	Time Held Analyzed (Days)	Q
Quarterly 001	Jan. 20, 2016	Jan. 20, 2016				Jan.21, 2016	7	1	P

XENCO Laboratories
CHRONOLOGY OF HOLDING TIMES

Analytical Method : pH by SM4500-H+ B
Client : Diversified Environmental Services

Work Order #: 523247
Project ID:

Field Sample ID	Date Collected	Date Received	Date Extracted	Max Holding Time Extracted (Hour)	Time Held Extracted (Hour)	Date Analyzed	Max Holding Time Analyzed (Hour)	Time Held Analyzed (Hour)	Q
Quarterly 001	Jan. 20, 2016	Jan. 20, 2016				Jan.20, 2016	1	0	P

F = These samples were analyzed outside the recommended holding time.
P = Samples analyzed within the recommended holding time.

FLORIDA flagging criteria

Data were reviewed by the
Department Supervisor and QA Director

A Value reported is the mean (average) of two or more determinations.

B Results based upon colony counts outside the acceptable range.

J Estimated value; value not accurate. All results with a "J" qualifier require comment.
- J1: Surrogate Recoveries exceed established QA/QC Limits
- J2: No known QA/QC exists.
- J3: Reported value failed to meet established QA/QC limits or the sample matrix interfered with the ability to make an accurate determination
- J4: The data is questionable due to improper laboratory or field protocols

Q Sample held beyond the accepted holding time

T Value reported is less than the laboratory method detection limit. The value is reported for informational purposes, only and shall not be used in statistical analysis.

U Compound was analyzed for but not detected at the MDL Level.

V Analyte was detected in both the sample and the associated method blank.

Y Laboratory analysis was from an unpreserved or improperly preserved sample. The data may not be accurate.

I The reported value is between the laboratory MDL and the laboratory PQL.

R Significant rain in the past 48 hours.

+ NELAC certification not offered for this compound.

***** (Next to analyte name or method description) = Outside XENCO's scope of NELAC accreditation

QC Summary 523247

Diversified Environmental Services
Quarterly

Analytical Method: Inorganic Anions by EPA 300
Seq Number: 986233 Matrix: Water
MB Sample Id: 986233-1-BLK LCS Sample Id: 986233-1-BKS LCSD Sample Id: 986233-1-BSD

Parameter	MB Result	Spike Amount	LCS Result	LCS %Rec	LCSD Result	LCSD %Rec	Limits	%RPD	RPD Limit	Units	Analysis Date	Flag
Chloride	<0.104	20.0	20.4	102	20.6	103	90-110	1	20	mg/L	01.22.16 11:01	

Analytical Method: Inorganic Anions by EPA 300
Seq Number: 986233 Matrix: Waste Water
Parent Sample Id: 523392-001 MD Sample Id: 523392-001 D

Parameter	Parent Result	MD Result	%RPD	RPD Limit	Units	Analysis Date	Flag
Chloride	96.0	96.5	1	20	mg/L	01.22.16 12:33	

Analytical Method: Inorganic Anions by EPA 300
Seq Number: 986233 Matrix: Waste Water
Parent Sample Id: 523392-001 MS Sample Id: 523392-001 S MSD Sample Id: 523392-001 SD

Parameter	Parent Result	Spike Amount	MS Result	MS %Rec	MSD Result	MSD %Rec	Limits	%RPD	RPD Limit	Units	Analysis Date	Flag
Chloride	96.0	20.0	115	95	115	95	80-120	0	20	mg/L	01.22.16 12:51	

Analytical Method: TDS by SM2540C
Seq Number: 986238 Matrix: Water
MB Sample Id: 986238-1-BLK LCS Sample Id: 986238-1-BKS LCSD Sample Id: 986238-1-BSD

Parameter	MB Result	Spike Amount	LCS Result	LCS %Rec	LCSD Result	LCSD %Rec	Limits	%RPD	RPD Limit	Units	Analysis Date	Flag
Total dissolved solids	8.00	562	600	107	608	108	80-120	1	10	mg/L	01.21.16 14:30	

Analytical Method: TDS by SM2540C
Seq Number: 986238 Matrix: Drinking Water
Parent Sample Id: 523236-001 MD Sample Id: 523236-001 D

Parameter	Parent Result	MD Result	%RPD	RPD Limit	Units	Analysis Date	Flag
Total dissolved solids	180	176	2	10	mg/L	01.21.16 14:30	

Analytical Method: pH by SM4500-H+ B
Seq Number: 986014 Matrix: Drinking Water
Parent Sample Id: 523236-001 MD Sample Id: 523236-001 D

Parameter	Parent Result	MD Result	%RPD	RPD Limit	Units	Analysis Date	Flag
pH	7.71	7.71	0	20	SU	01.20.16 16:55	

QC Summary 523247

Diversified Environmental Services

Quarterly

Analytical Method: Metals per ICP by EPA 200.7 — Prep Method: E200.7P
Seq Number: 986162 — Matrix: Water — Date Prep: 01.22.16
MB Sample Id: 703736-1-BLK — LCS Sample Id: 703736-1-BKS — LCSD Sample Id: 703736-1-BSD

Parameter	MB Result	Spike Amount	LCS Result	LCS %Rec	LCSD Result	LCSD %Rec	Limits	%RPD	RPD Limit	Units	Analysis Date	Flag
Antimony	<0.00500	1.00	1.02	102	1.00	100	85-115	2	20	mg/L	01.22.16 12:38	
Arsenic	<0.00400	1.00	1.03	103	1.00	100	85-115	3	20	mg/L	01.22.16 12:38	
Cadmium	<0.000300	1.00	0.999	100	0.972	97	85-115	3	20	mg/L	01.22.16 12:38	
Chromium	0.00120	1.00	1.01	101	0.986	99	85-115	2	20	mg/L	01.22.16 12:38	
Cobalt	<0.000900	1.00	1.01	101	0.985	99	85-115	3	20	mg/L	01.22.16 12:38	
Copper	<0.00110	1.00	1.05	105	1.02	102	85-115	3	20	mg/L	01.22.16 12:38	
Lead	<0.00330	1.00	1.01	101	0.981	98	85-115	3	20	mg/L	01.22.16 12:38	
Nickel	<0.00170	1.00	1.02	102	0.998	100	85-115	2	20	mg/L	01.22.16 12:38	
Silver	<0.000600	1.00	0.996	100	0.968	97	85-115	3	20	mg/L	01.22.16 12:38	
Tin	<0.00560	1.00	1.02	102	0.991	99	85-115	3	20	mg/L	01.22.16 12:38	
Titanium	<0.000960	1.00	1.01	101	0.977	98	85-115	3	20	mg/L	01.22.16 12:38	
Vanadium	<0.000800	1.00	1.01	101	0.985	99	85-115	3	20	mg/L	01.22.16 12:38	
Zinc	<0.000900	1.00	1.02	102	0.991	99	85-115	3	20	mg/L	01.22.16 12:38	

Analytical Method: Metals per ICP by EPA 200.7 — Prep Method: E200.7P
Seq Number: 986162 — Matrix: Waste Water — Date Prep: 01.22.16
Parent Sample Id: 523247-001 — MD Sample Id: 523247-001 D

Parameter	Parent Result	MD Result	%RPD	RPD Limit	Units	Analysis Date	Flag
Antimony	<0.00500	<0.00500	0	20	mg/L	01.22.16 12:44	U
Arsenic	<0.00400	<0.00400	0	20	mg/L	01.22.16 12:44	U
Cadmium	<0.000300	<0.000300	0	20	mg/L	01.22.16 12:44	U
Chromium	0.00230	0.000600	117	20	mg/L	01.22.16 12:44	JI
Cobalt	<0.000900	<0.000900	0	20	mg/L	01.22.16 12:44	U
Copper	0.00760	0.00740	3	20	mg/L	01.22.16 12:44	I
Lead	<0.00330	<0.00330	0	20	mg/L	01.22.16 12:44	U
Nickel	0.0244	0.0241	1	20	mg/L	01.22.16 12:44	
Silver	<0.000600	<0.000600	0	20	mg/L	01.22.16 12:44	U
Tin	<0.00560	<0.00560	0	20	mg/L	01.22.16 12:44	U
Titanium	0.00110	0.00100	10	20	mg/L	01.22.16 12:44	I
Vanadium	0.00950	0.00950	0	20	mg/L	01.22.16 12:44	I
Zinc	0.218	0.221	1	20	mg/L	01.22.16 12:44	

QC Summary 523247

Diversified Environmental Services

Quarterly

Analytical Method: Metals per ICP by EPA 200.7 — Prep Method: E200.7P
Seq Number: 986162 — Matrix: Waste Water — Date Prep: 01.22.16
Parent Sample Id: 523247-001 — MS Sample Id: 523247-001 S — MSD Sample Id: 523247-001 SD

Parameter	Parent Result	Spike Amount	MS Result	MS %Rec	MSD Result	MSD %Rec	Limits	%RPD	RPD Limit	Units	Analysis Date	Flag
Antimony	<0.00500	1.00	1.04	104	1.05	105	85-115	1	20	mg/L	01.22.16 12:46	
Arsenic	<0.00400	1.00	1.07	107	1.09	109	85-115	2	20	mg/L	01.22.16 12:46	
Cadmium	<0.000300	1.00	0.970	97	0.983	98	85-115	1	20	mg/L	01.22.16 12:46	
Chromium	0.00230	1.00	0.977	97	0.992	99	85-115	2	20	mg/L	01.22.16 12:46	
Cobalt	<0.000900	1.00	0.961	96	0.978	98	85-115	2	20	mg/L	01.22.16 12:46	
Copper	0.00760	1.00	1.04	103	1.05	104	85-115	1	20	mg/L	01.22.16 12:46	
Lead	<0.00330	1.00	0.942	94	0.956	96	85-115	1	20	mg/L	01.22.16 12:46	
Nickel	0.0244	1.00	0.990	97	1.01	99	85-115	2	20	mg/L	01.22.16 12:46	
Silver	<0.000600	1.00	0.994	99	1.01	101	85-115	2	20	mg/L	01.22.16 12:46	
Tin	<0.00560	1.00	0.979	98	0.983	98	85-115	0	20	mg/L	01.22.16 12:46	
Titanium	0.00110	1.00	0.978	98	0.991	99	85-115	1	20	mg/L	01.22.16 12:46	
Vanadium	0.00950	1.00	1.01	100	1.02	101	85-115	1	20	mg/L	01.22.16 12:46	
Zinc	0.218	1.00	1.24	102	1.26	104	85-115	2	20	mg/L	01.22.16 12:46	

Analytical Method: Mercury, Total by EPA 245.1 — Prep Method: E245.1P
Seq Number: 986155 — Matrix: Water — Date Prep: 01.22.16
MB Sample Id: 703737-1-BLK — LCS Sample Id: 703737-1-BKS — LCSD Sample Id: 703737-1-BSD

Parameter	MB Result	Spike Amount	LCS Result	LCS %Rec	LCSD Result	LCSD %Rec	Limits	%RPD	RPD Limit	Units	Analysis Date	Flag
Mercury	<0.0000101	0.00300	0.00284	95	0.00300	100	85-115	5	20	mg/L	01.22.16 11:12	

Analytical Method: Mercury, Total by EPA 245.1 — Prep Method: E245.1P
Seq Number: 986155 — Matrix: Waste Water — Date Prep: 01.22.16
Parent Sample Id: 523247-001 — MD Sample Id: 523247-001 D

Parameter	Parent Result	MD Result	%RPD	RPD Limit	Units	Analysis Date	Flag
Mercury	<0.0000101	<0.0000101	0	20	mg/L	01.22.16 11:21	U

Analytical Method: Mercury, Total by EPA 245.1 — Prep Method: E245.1P
Seq Number: 986155 — Matrix: Waste Water — Date Prep: 01.22.16
Parent Sample Id: 523247-001 — MS Sample Id: 523247-001 S — MSD Sample Id: 523247-001 SD

Parameter	Parent Result	Spike Amount	MS Result	MS %Rec	MSD Result	MSD %Rec	Limits	%RPD	RPD Limit	Units	Analysis Date	Flag
Mercury	<0.0000101	0.00300	0.00278	93	0.00289	96	85-115	4	20	mg/L	01.22.16 11:24	

QC Summary 523247

Diversified Environmental Services

Quarterly

Analytical Method: SVOCs by EPA 625 | Prep Method: E625P
Seq Number: 986242 | Matrix: Water | Date Prep: 01.21.16
MB Sample Id: 703744-1-BLK | LCS Sample Id: 703744-1-BKS | LCSD Sample Id: 703744-1-BSD

Parameter	MB Result	Spike Amount	LCS Result	LCS %Rec	LCSD Result	LCSD %Rec	Limits	%RPD	RPD Limit	Units	Analysis Date	Flag
2,4,6-Trichlorophenol	<0.00164	0.0500	0.0359	72	0.0362	72	37-144	1	30	mg/L	01.22.16 13:52	
bis(2-ethylhexyl) phthalate	<0.00120	0.0500	0.0419	84	0.0414	83	8-158	1	30	mg/L	01.22.16 13:52	
Fluoranthene	<0.00181	0.0500	0.0384	77	0.0401	80	26-137	4	30	mg/L	01.22.16 13:52	
2-methylphenol	<0.00200	0.0500	0.0321	64	0.0298	60	40-110	7	30	mg/L	01.22.16 13:52	
3&4-Methylphenol	<0.00255	0.0500	0.0327	65	0.0316	63	30-110	3	30	mg/L	01.22.16 13:52	
Carbazole	<0.000231	0.0500	0.0421	84	0.0443	89	50-115	5	25	mg/L	01.22.16 13:52	

Surrogate	MB %Rec	MB Flag	LCS %Rec	LCS Flag	LCSD %Rec	LCSD Flag	Limits	Units	Analysis Date
2-Fluorobiphenyl	74		77		72		39-99	%	01.22.16 13:52
2-Fluorophenol	66		65		59		33-92	%	01.22.16 13:52
2,4,6-Tribromophenol	72		82		78		32-129	%	01.22.16 13:52
Nitrobenzene-d5	73		69		66		37-94	%	01.22.16 13:52
Phenol-d5	64		65		58		50-200	%	01.22.16 13:52
Terphenyl-D14	108		92		96		18-133	%	01.22.16 13:52

Analytical Method: SVOCs by EPA 625 | Prep Method: E625P
Seq Number: 986242 | Matrix: Water | Date Prep: 01.21.16
MB Sample Id: 703744-1-BLK

Parameter	MB Result	Units	Analysis Date	Flag
n-Decane	U	mg/L	01.22.16 13:23	
n-Octadecane	U	mg/L	01.22.16 13:23	

QC Summary 523247

Diversified Environmental Services

Quarterly

Analytical Method: VOAs by EPA 624 | Prep Method: E624P
Seq Number: 986197 | Matrix: Water | Date Prep: 01.21.16
MB Sample Id: 703778-1-BLK | LCS Sample Id: 703778-1-BKS | LCSD Sample Id: 703778-1-BSD

Parameter	MB Result	Spike Amount	LCS Result	LCS %Rec	LCSD Result	LCSD %Rec	Limits	%RPD	RPD Limit	Units	Analysis Date	Flag
Acrolein	<3.50	40.0	98.7	247	98.5	246	40-140	0	20	ug/L	01.21.16 22:28	JH
Acrylonitrile	<0.490	40.0	48.2	121	50.5	126	40-140	5	20	ug/L	01.21.16 22:28	
Benzene	<0.160	20.0	21.3	107	21.1	106	37-151	1	20	ug/L	01.21.16 22:28	
Bromodichloromethane	<0.250	20.0	22.7	114	22.6	113	35-155	0	20	ug/L	01.21.16 22:28	
Bromoform	<0.170	20.0	21.5	108	21.8	109	45-169	1	20	ug/L	01.21.16 22:28	
Methyl bromide	<0.250	20.0	28.5	143	26.8	134	1-242	6	20	ug/L	01.21.16 22:28	
MTBE	<0.180	40.0	36.8	92	37.2	93	70-130	1	20	ug/L	01.21.16 22:28	
Carbon Tetrachloride	<0.330	20.0	23.2	116	22.9	115	70-140	1	20	ug/L	01.21.16 22:28	
Chlorobenzene	<0.150	20.0	21.5	108	21.9	110	37-160	2	20	ug/L	01.21.16 22:28	
Chloroethane	<0.260	20.0	29.8	149	30.9	155	14-230	4	20	ug/L	01.21.16 22:28	
2-Chloroethyl Vinyl Ether	<0.290	40.0	29.5	74	30.1	75	1-305	2	20	ug/L	01.21.16 22:28	
Chloroform	<0.160	20.0	23.3	117	21.8	109	51-138	7	20	ug/L	01.21.16 22:28	
Methyl Chloride	<0.250	20.0	19.4	97	19.9	100	1-273	3	20	ug/L	01.21.16 22:28	
Dibromochloromethane	<0.150	20.0	22.5	113	22.3	112	53-149	1	20	ug/L	01.21.16 22:28	
1,2-Dichlorobenzene	<0.140	20.0	22.2	111	22.9	115	18-190	3	20	ug/L	01.21.16 22:28	
1,3-Dichlorobenzene	<0.170	20.0	22.8	114	22.5	113	59-156	1	20	ug/L	01.21.16 22:28	
1,4-Dichlorobenzene	<0.170	20.0	22.4	112	22.2	111	18-190	1	20	ug/L	01.21.16 22:28	
Dichlorodifluoromethane	<0.00100	0.0200	0.0192	96	0.0202	101	70-130	5	23	mg/L	01.21.16 22:28	
1,2-Dichloroethane	<0.180	20.0	24.7	124	24.7	124	49-155	0	20	ug/L	01.21.16 22:28	
1,1-Dichloroethane	<0.110	20.0	24.9	125	25.4	127	59-155	2	20	ug/L	01.21.16 22:28	
trans-1,2-dichloroethylene	<0.210	20.0	23.9	120	23.7	119	54-156	1	20	ug/L	01.21.16 22:28	
cis-1,2-Dichloroethylene	<0.00100	0.0200	0.0192	96	0.0189	95	75-125	2	20	mg/L	01.21.16 22:28	
1,1-Dichloroethene	<0.200	20.0	23.6	118	22.9	115	1-234	3	20	ug/L	01.21.16 22:28	
1,2-Dichloropropane	<0.150	20.0	20.4	102	20.8	104	1-210	2	20	ug/L	01.21.16 22:28	
trans-1,3-dichloropropene	<0.110	20.0	20.2	101	20.6	103	17-183	2	20	ug/L	01.21.16 22:28	
cis-1,3-Dichloropropene	<0.100	20.0	20.8	104	20.7	104	1-227	0	20	ug/L	01.21.16 22:28	
Ethylbenzene	<0.190	20.0	21.5	108	21.7	109	37-162	1	20	ug/L	01.21.16 22:28	
1,1,2,2-Tetrachloroethane	<0.180	20.0	24.1	121	24.2	121	46-157	0	20	ug/L	01.21.16 22:28	
Toluene	2.11	20.0	21.0	105	21.3	107	47-150	1	20	ug/L	01.21.16 22:28	
1,1,2-Trichloroethane	<0.250	20.0	22.5	113	22.3	112	52-150	1	20	ug/L	01.21.16 22:28	
1,1,1-Trichloroethane	<0.160	20.0	24.4	122	24.8	124	52-162	2	20	ug/L	01.21.16 22:28	
o-Xylene	<0.200	20.0	20.1	101	20.3	102	70-130	1	20	ug/L	01.21.16 22:28	
m,p-Xylenes	1.43	40.0	43.4	109	43.1	108	70-130	1	20	ug/L	01.21.16 22:28	
Methylene Chloride	<0.420	20.0	23.3	117	23.2	116	1-221	0	20	ug/L	01.21.16 22:28	
Tetrachloroethylene	<0.160	20.0	19.5	98	19.5	98	64-148	0	20	ug/L	01.21.16 22:28	

Surrogate	MB %Rec	MB Flag	LCS %Rec	LCS Flag	LCSD %Rec	LCSD Flag	Limits	Units	Analysis Date
4-Bromofluorobenzene	114		106		107		30-186	%	01.21.16 22:28
1,2-Dichloroethane-D4	140		123		126		53-159	%	01.21.16 22:28
Toluene-D8	115		111		111		70-130	%	01.21.16 22:28

QC Summary 523247

Diversified Environmental Services

Quarterly

Analytical Method: VOAs by EPA 624 | Prep Method: E624P
Seq Number: 986197 | Matrix: Water | Date Prep: 01.21.16
Parent Sample Id: 522943-001 | MS Sample Id: 522943-001 S | MSD Sample Id: 522943-001 SD

Parameter	Parent Result	Spike Amount	MS Result	MS %Rec	MSD Result	MSD %Rec	Limits	%RPD	RPD Limit	Units	Analysis Date	Flag
Acrolein	<3.50	40.0	73.1	183	71.5	179	40-140	2	20	ug/L	01.22.16 12:37	J
Acrylonitrile	<0.490	40.0	47.7	119	49.1	123	40-140	3	20	ug/L	01.22.16 12:37	
Benzene	<0.160	20.0	19.3	97	18.4	92	37-151	5	20	ug/L	01.22.16 12:37	
Bromodichloromethane	<0.250	20.0	22.4	112	21.9	110	35-155	2	20	ug/L	01.22.16 12:37	
Bromoform	<0.170	20.0	21.1	106	21.1	106	45-169	0	20	ug/L	01.22.16 12:37	
Methyl bromide	<0.250	20.0	23.6	118	24.4	122	1-242	3	20	ug/L	01.22.16 12:37	
MTBE	<0.180	40.0	35.2	88	34.2	86	70-130	3	20	ug/L	01.22.16 12:37	
Carbon Tetrachloride	5.55	20.0	24.9	97	23.4	89	70-140	6	20	ug/L	01.22.16 12:37	
Chlorobenzene	<0.150	20.0	20.7	104	20.0	100	37-160	3	20	ug/L	01.22.16 12:37	
Chloroethane	<0.260	20.0	30.7	154	28.8	144	14-230	6	20	ug/L	01.22.16 12:37	
2-Chloroethyl Vinyl Ether	<0.290	40.0	<0.290	0	<0.290	0	1-305	NC	20	ug/L	01.22.16 12:37	J
Chloroform	5.16	20.0	25.2	100	22.7	88	51-138	10	20	ug/L	01.22.16 12:37	
Methyl Chloride	<0.250	20.0	19.2	96	18.9	95	1-273	2	20	ug/L	01.22.16 12:37	
Dibromochloromethane	<0.150	20.0	22.2	111	21.3	107	53-149	4	20	ug/L	01.22.16 12:37	
1,2-Dichlorobenzene	<0.140	20.0	20.4	102	20.4	102	18-190	0	20	ug/L	01.22.16 12:37	
1,3-Dichlorobenzene	<0.170	20.0	20.2	101	19.6	98	59-156	3	20	ug/L	01.22.16 12:37	
1,4-Dichlorobenzene	<0.170	20.0	19.8	99	20.0	100	18-190	1	20	ug/L	01.22.16 12:37	
Dichlorodifluoromethane	<0.00100	0.0200	0.0222	111	0.0215	108	70-130	3	23	mg/L	01.22.16 12:37	
1,2-Dichloroethane	<0.180	20.0	23.6	118	22.6	113	49-155	4	20	ug/L	01.22.16 12:37	
1,1-Dichloroethane	<0.110	20.0	24.5	123	23.6	118	59-155	4	20	ug/L	01.22.16 12:37	
trans-1,2-dichloroethylene	<0.210	20.0	22.1	111	22.2	111	54-156	0	20	ug/L	01.22.16 12:37	
cis-1,2-Dichloroethylene	<0.00100	0.0200	0.0196	98	0.0171	86	75-125	14	20	mg/L	01.22.16 12:37	
1,1-Dichloroethene	<0.200	20.0	22.7	114	21.9	110	1-234	4	20	ug/L	01.22.16 12:37	
1,2-Dichloropropane	<0.150	20.0	19.0	95	19.3	97	1-210	2	20	ug/L	01.22.16 12:37	
trans-1,3-dichloropropene	<0.110	20.0	18.1	91	17.5	88	17-183	3	20	ug/L	01.22.16 12:37	
cis-1,3-Dichloropropene	<0.100	20.0	16.8	84	16.2	81	1-227	4	20	ug/L	01.22.16 12:37	
Ethylbenzene	<0.190	20.0	21.0	105	19.8	99	37-162	6	20	ug/L	01.22.16 12:37	
1,1,2,2-Tetrachloroethane	<0.180	20.0	22.2	111	21.8	109	46-157	2	20	ug/L	01.22.16 12:37	
Toluene	1.73	20.0	21.3	98	20.1	92	47-150	6	20	ug/L	01.22.16 12:37	
1,1,2-Trichloroethane	<0.250	20.0	22.1	111	21.3	107	52-150	4	20	ug/L	01.22.16 12:37	
1,1,1-Trichloroethane	<0.160	20.0	24.4	122	23.2	116	52-162	5	20	ug/L	01.22.16 12:37	
o-Xylene	<0.200	20.0	19.4	97	18.2	91	70-130	6	20	ug/L	01.22.16 12:37	
m,p-Xylenes	1.07	40.0	42.2	103	39.6	96	70-130	6	20	ug/L	01.22.16 12:37	
Methylene Chloride	<0.420	20.0	22.5	113	21.1	106	1-221	6	20	ug/L	01.22.16 12:37	
Tetrachloroethylene	<0.160	20.0	17.9	90	17.6	88	64-148	2	20	ug/L	01.22.16 12:37	

Surrogate	MS %Rec	MS Flag	MSD %Rec	MSD Flag	Limits	Units	Analysis Date
4-Bromofluorobenzene	103		105		30-186	%	01.22.16 12:37
1,2-Dichloroethane-D4	129		128		53-159	%	01.22.16 12:37
Toluene-D8	108		107		70-130	%	01.22.16 12:37

Analytical Report 517998

for

Diversified Environmental Services

Project Manager: Gerry McCormick

Quarterly

001

02-NOV-15

Collected By: Client

Florida Testing Services DBA Xenco Laboratories
5675 New Tampa HWY

Xenco-Houston (EPA Lab code: TX00122):
Texas (T104704215-15-19), Arizona (AZ0765), Florida (E871002), Louisiana (03054)
Oklahoma (9218)

Xenco-Atlanta (EPA Lab Code: GA00046):
Florida (E87429), North Carolina (483), South Carolina (98015), Kentucky (85), DoD (L10-135)
Texas (T104704477), Louisiana (04176), USDA (P330-07-00105)

Xenco-Lakeland: Florida (E84098)
Xenco-Odessa (EPA Lab code: TX00158): Texas (T104704400-TX)
Xenco-Dallas (EPA Lab code: TX01468): Texas (T104704295-TX)
Xenco Phoenix (EPA Lab Code: AZ00901): Arizona(AZ0757)
Xenco-Phoenix Mobile (EPA Lab code: AZ00901): Arizona (AZM757)
Xenco Tucson (EPA Lab code:AZ000989): Arizona (AZ0758)

02-NOV-15

Project Manager: **Gerry McCormick**
Diversified Environmental Services
1201 N 22nd Street
Tampa, FL 33605

Reference: XENCO Report No(s): **517998**
Quarterly
Project Address: FL

Gerry McCormick:

We are reporting to you the results of the analyses performed on the samples received under the project name referenced above and identified with the XENCO Report Number(s) 517998. All results being reported under this Report Number apply to the samples analyzed and properly identified with a Laboratory ID number. Subcontracted analyses are identified in this report with either the NELAC certification number of the subcontract lab in the analyst ID field, or the complete subcontracted report attached to this report.

Unless otherwise noted in a Case Narrative, all data reported in this Analytical Report are in compliance with NELAC standards. The uncertainty of measurement associated with the results of analysis reported is available upon request. Should insufficient sample be provided to the laboratory to meet the method and NELAC Matrix Duplicate and Matrix Spike requirements, then the data will be analyzed, evaluated and reported using all other available quality control measures.

The validity and integrity of this report will remain intact as long as it is accompanied by this letter and reproduced in full, unless written approval is granted by XENCO Laboratories. This report will be filed for at least 5 years in our archives after which time it will be destroyed without further notice, unless otherwise arranged with you. The samples received, and described as recorded in Report No. 517998 will be filed for 60 days, and after that time they will be properly disposed without further notice, unless otherwise arranged with you. We reserve the right to return to you any unused samples, extracts or solutions related to them if we consider so necessary (e.g., samples identified as hazardous waste, sample sizes exceeding analytical standard practices, controlled substances under regulated protocols, etc).

We thank you for selecting XENCO Laboratories to serve your analytical needs. If you have any questions concerning this report, please feel free to contact us at any time.

Respectfully,

Amy Atkins

Amy Atkins
Project Manager

Sample Cross Reference 517998

Diversified Environmental Services, Tampa, FL

Quarterly

Sample Id	Matrix	Date Collected	Sample Depth	Lab Sample Id
Quarterly 001	W	10-23-15 09:00		517998-001

CASE NARRATIVE

Client Name: Diversified Environmental Services
Project Name: Quarterly

Project ID: *001*
Work Order Number(s): *517998*

Report Date: *02-NOV-15*
Date Received: *10/23/2015*

Sample receipt non conformances and comments:

Sample receipt non conformances and comments per sample:

None

Hits Summary 517998

Diversified Environmental Services, Tampa, FL

Quarterly

Below is a summary of the analytes which were found to be present in the samples associated with this work order. This should only be used in conjunction with the included analytical results.

Sample ID: Quarterly 001 **Sample ID: 517998-001** **Date/Time Sampled: 10/23/2015 09:00** **Matrix: Water**

Analyte Name	*Method*	*CAS No.*	*Dil.*	*Result*	*RL/PQL*	*MDL*	*Units*	*Qual*
Arsenic	E200.7	7440-38-2	1	0.0122	0.0100	0.00400	mg/L	
Benzene	EPA624	71-43-2	1	9.27	1.00	0.160	ug/L	
Chloride	E300.0	16887-00-6	20	1600	100	2.08	mg/L	
Chromium	E200.7	7440-47-3	1	0.00110	0.0500	0.000300	mg/L	VI
Copper	E200.7	7440-50-8	1	0.00700	0.0500	0.00110	mg/L	VI
Ethylbenzene	EPA624	100-41-4	1	1.87	1.00	0.190	ug/L	
Nickel	E200.7	7440-02-0	1	0.0254	0.0100	0.00170	mg/L	
Toluene	EPA624	108-88-3	1	1.59	1.00	0.140	ug/L	
Total BTEX	EPA624		1	33.4	1.00	0.140	ug/L	
Total Xylenes	EPA624	1330-20-7	1	20.6	1.00	0.200	ug/L	
Total dissolved solids	SM2540C	TDS	1	2800	5.00	1.78	mg/L	
Vanadium	E200.7	7440-62-2	1	0.00510	0.0100	0.000800	mg/L	I
Zinc	E200.7	7440-66-6	1	0.0726	0.100	0.000900	mg/L	I
bis(2-ethylhexyl) phthalate	E625	117-81-7	5	0.0625	0.0500	0.00600	mg/L	
m,p-Xylenes	EPA624	179601-23-1	1	9.44	2.00	0.510	ug/L	
n-Octadecane +	E625	593-45-3	5	0.0136	0.0500	0.0100	mg/L	I
o-Xylene	EPA624	95-47-6	1	11.2	1.00	0.200	ug/L	
pH	SM4500-H+	12408-02-5	1	7.42			SU	Q

Certificate of Analytical Results 517998

Diversified Environmental Services, Tampa, FL

Quarterly

Sample Id: Quarterly 001
Lab Sample Id: 517998-001

Matrix: Waste Water
Date Collected: 10.23.15 09.00

Date Received: 10.23.15 11.30

Analytical Method: Inorganic Anions by EPA 300
Tech: NSI
Analyst: NSI
Seq Number: 980125

% Moisture:

SUB: E87429

Parameter	Cas Number	Result	PQL	MDL	Flag	Units	Analysis Date	Dil
Chloride	16887-00-6	1600	100	2.08		mg/L	10.28.15 15.15	20

Analytical Method: TDS by SM2540C
Tech: RBC
Analyst: RBC
Seq Number: 980107

% Moisture:

Parameter	Cas Number	Result	PQL	MDL	Flag	Units	Analysis Date	Dil
Total dissolved solids	TDS	2800	5.00	1.78		mg/L	10.27.15 09.30	1

Analytical Method: pH by SM4500-H+ B
Tech: RBC
Analyst: BAM
Seq Number: 980041

% Moisture:

Parameter	Cas Number	Result	PQL	MDL	Flag	Units	Analysis Date	Dil
pH	12408-02-5	7.42			Q	SU	10.23.15 17.00	1

Final 1.000

Certificate of Analytical Results 517998

Diversified Environmental Services, Tampa, FL

Quarterly

Sample Id: **Quarterly 001** Matrix: Waste Water Date Received:10.23.15 11.30

Lab Sample Id: 517998-001 Date Collected: 10.23.15 09.00

Analytical Method: Metals per ICP by EPA 200.7 Prep Method: E200.7P

Tech: ABA % Moisture:

Analyst: ABA Date Prep: 10.28.15 07.07

Seq Number: 980050 SUB: E87429

Parameter	Cas Number	Result	PQL	MDL	Flag	Units	Analysis Date	Dil
Antimony	7440-36-0	U	0.0100	0.00500	U	mg/L	10.28.15 11.40	1
Arsenic	7440-38-2	**0.0122**	0.0100	0.00400		mg/L	10.28.15 11.40	1
Cadmium	7440-43-9	U	0.00500	0.000300	U	mg/L	10.28.15 11.40	1
Chromium	7440-47-3	**0.00110**	0.0500	0.000300	VI	mg/L	10.28.15 11.40	1
Cobalt	7440-48-4	U	0.0100	0.000900	U	mg/L	10.28.15 11.40	1
Copper	7440-50-8	**0.00700**	0.0500	0.00110	VI	mg/L	10.28.15 11.40	1
Lead	7439-92-1	U	0.0100	0.00330	U	mg/L	10.28.15 11.40	1
Nickel	7440-02-0	**0.0254**	0.0100	0.00170		mg/L	10.28.15 11.40	1
Silver	7440-22-4	U	0.0500	0.000600	U	mg/L	10.28.15 11.40	1
Tin	7440-31-5	U	0.0500	0.00560	UJ	mg/L	10.28.15 11.40	1
Titanium	7440-32-6	U	0.0500	0.000960	U	mg/L	10.28.15 11.40	1
Vanadium	7440-62-2	**0.00510**	0.0100	0.000800	I	mg/L	10.28.15 11.40	1
Zinc	7440-66-6	**0.0726**	0.100	0.000900	I	mg/L	10.28.15 11.40	1

Analytical Method: Mercury, Total by EPA 245.1 Prep Method: E245.1P

Tech: ABA % Moisture:

Analyst: ABA Date Prep: 10.28.15 07.07

Seq Number: 980031 SUB: E87429

Parameter	Cas Number	Result	PQL	MDL	Flag	Units	Analysis Date	Dil
Mercury	7439-97-6	U	0.00200	0.0000101	U	mg/L	10.28.15 10.37	1

Final 1.000

Certificate of Analytical Results 517998

Diversified Environmental Services, Tampa, FL

Quarterly

Sample Id: Quarterly 001 **Matrix:** Waste Water **Date Received:** 10.23.15 11.30
Lab Sample Id: 517998-001 **Date Collected:** 10.23.15 09.00

Analytical Method: SVOCs by EPA 625 **Prep Method:** E625P
Tech: BRO **% Moisture:**
Analyst: VIC **Date Prep:** 10.28.15 11.30
Seq Number: 980179 **SUB:** E87429

Parameter	Cas Number	Result	PQL	MDL	Flag	Units	Analysis Date	Dil
2,4,6-Trichlorophenol	88-06-2	U	0.0500	0.00820	U	mg/L	10.28.15 20.30	5
bis(2-ethylhexyl) phthalate	117-81-7	**0.0625**	0.0500	0.00600		mg/L	10.28.15 20.30	5
Fluoranthene	206-44-0	U	0.0500	0.00905	U	mg/L	10.28.15 20.30	5
n-Decane	124-18-5	U	0.0500	0.0100	U	mg/L	10.28.15 20.30	5
2-methylphenol	95-48-7	U	0.0500	0.0100	U	mg/L	10.28.15 20.30	5
3&4-Methylphenol	15831-10-4	U	0.100	0.0128	U	mg/L	10.28.15 20.30	5
n-Octadecane	593-45-3	**0.0136**	0.0500	0.0100	I	mg/L	10.28.15 20.30	5
Carbazole	86-74-8	U	0.0250	0.00116	U	mg/L	10.28.15 20.30	5

Surrogate	Cas Number	% Recovery	Units	Limits	Analysis Date	Flag
2-Fluorobiphenyl	321-60-8	80	%	44-117	10.28.15 20.30	
2-Fluorophenol	367-12-4	76	%	30-100	10.28.15 20.30	
2,4,6-Tribromophenol	118-79-6	93	%	48-127	10.28.15 20.30	
Nitrobenzene-d5	4165-60-0	81	%	46-111	10.28.15 20.30	
Phenol-d5	4165-62-2	76	%	50-200	10.28.15 20.30	
Terphenyl-D14	1718-51-0	84	%	46-126	10.28.15 20.30	

Final 1.000

Certificate of Analytical Results 517998

Diversified Environmental Services, Tampa, FL

Quarterly

Sample Id: **Quarterly 001**
Lab Sample Id: 517998-001

Matrix: Waste Water
Date Collected: 10.23.15 09.00

Date Received:10.23.15 11.30

Analytical Method: VOAs by EPA 624
Tech: ZHO
Analyst: ZHO
Seq Number: 980333

Date Prep: 11.01.15 19.44

Prep Method: E624P
% Moisture:

SUB: E87429

Parameter	Cas Number	Result	PQL	MDL	Flag	Units	Analysis Date	Dil
Acrolein	107-02-8	U	20.0	3.50	U	ug/L	11.02.15 08.37	1
Acrylonitrile	107-13-1	U	2.00	0.490	U	ug/L	11.02.15 08.37	1
Benzene	71-43-2	**9.27**	1.00	0.160		ug/L	11.02.15 08.37	1
Bromodichloromethane	75-27-4	U	1.00	0.250	U	ug/L	11.02.15 08.37	1
Bromoform	75-25-2	U	1.00	0.170	U	ug/L	11.02.15 08.37	1
Methyl bromide	74-83-9	U	1.00	0.250	U	ug/L	11.02.15 08.37	1
MTBE	1634-04-4	U	2.00	0.180	U	ug/L	11.02.15 08.37	1
Carbon Tetrachloride	56-23-5	U	1.00	0.330	U	ug/L	11.02.15 08.37	1
Chlorobenzene	108-90-7	U	1.00	0.150	U	ug/L	11.02.15 08.37	1
Chloroethane	75-00-3	U	1.00	0.260	U	ug/L	11.02.15 08.37	1
2-Chloroethyl Vinyl Ether	110-75-8	U	1.00	0.290	U	ug/L	11.02.15 08.37	1
Chloroform	67-66-3	U	1.00	0.160	U	ug/L	11.02.15 08.37	1
Methyl Chloride	74-87-3	U	1.00	0.250	U	ug/L	11.02.15 08.37	1
Dibromochloromethane	124-48-1	U	1.00	0.150	U	ug/L	11.02.15 08.37	1
1,2-Dichlorobenzene	95-50-1	U	1.00	0.140	U	ug/L	11.02.15 08.37	1
1,3-Dichlorobenzene	541-73-1	U	1.00	0.170	U	ug/L	11.02.15 08.37	1
1,4-Dichlorobenzene	106-46-7	U	1.00	0.170	U	ug/L	11.02.15 08.37	1
Dichlorodifluoromethane	75-71-8	U	5.00	1.00	U	ug/L	11.02.15 08.37	1
1,2-Dichloroethane	107-06-2	U	1.00	0.180	U	ug/L	11.02.15 08.37	1
1,1-Dichloroethane	75-34-3	U	1.00	0.110	U	ug/L	11.02.15 08.37	1
trans-1,2-dichloroethylene	156-60-5	U	1.00	0.210	U	ug/L	11.02.15 08.37	1
cis-1,2-Dichloroethylene	156-59-2	U	5.00	1.00	U	ug/L	11.02.15 08.37	1
1,1-Dichloroethene	75-35-4	U	1.00	0.200	U	ug/L	11.02.15 08.37	1
1,2-Dichloropropane	78-87-5	U	1.00	0.150	U	ug/L	11.02.15 08.37	1
trans-1,3-dichloropropene	10061-02-6	U	1.00	0.110	U	ug/L	11.02.15 08.37	1
cis-1,3-Dichloropropene	10061-01-5	U	1.00	0.100	U	ug/L	11.02.15 08.37	1
Ethylbenzene	**100-41-4**	**1.87**	1.00	0.190		ug/L	11.02.15 08.37	1
1,1,2,2-Tetrachloroethane	79-34-5	U	1.00	0.180	U	ug/L	11.02.15 08.37	1
Toluene	108-88-3	**1.59**	1.00	0.140		ug/L	11.02.15 08.37	1
1,1,2-Trichloroethane	79-00-5	U	1.00	0.250	U	ug/L	11.02.15 08.37	1
1,1,1-Trichloroethane	71-55-6	U	1.00	0.160	U	ug/L	11.02.15 08.37	1
o-Xylene	95-47-6	**11.2**	1.00	0.200		ug/L	11.02.15 08.37	1
m,p-Xylenes	179601-23-1	**9.44**	2.00	0.510		ug/L	11.02.15 08.37	1
Methylene Chloride	75-09-2	U	1.00	0.420	U	ug/L	11.02.15 08.37	1
Total BTEX		**33.4**	1.00	0.140		ug/L	11.02.15 08.37	1
Total Xylenes	1330-20-7	**20.6**	1.00	0.200		ug/L	11.02.15 08.37	1
Tetrachloroethylene	127-18-4	U	1.00	0.160	U	ug/L	11.02.15 08.37	1

Final 1.000

Certificate of Analytical Results 517998

Diversified Environmental Services, Tampa, FL

Quarterly

Sample Id: Quarterly 001
Lab Sample Id: 517998-001

Matrix: Waste Water
Date Collected: 10.23.15 09.00

Date Received:10.23.15 11.30

Analytical Method: VOAs by EPA 624
Tech: ZHO
Analyst: ZHO
Seq Number: 980333

Date Prep: 11.01.15 19.44

Prep Method: E624P
% Moisture:

SUB: E87429

Surrogate	Cas Number	% Recovery	Units	Limits	Analysis Date	Flag
4-Bromofluorobenzene	460-00-4	99	%	30-186	11.02.15 08.37	
1,2-Dichloroethane-D4	17060-07-0	101	%	53-159	11.02.15 08.37	
Toluene-D8	2037-26-5	101	%	70-130	11.02.15 08.37	

Final 1.000

XENCO Laboratories
CHRONOLOGY OF HOLDING TIMES

Analytical Method : **Metals per ICP by EPA 200.7**

Client : Diversified Environmental Services

Work Order #: **517998**

Project ID: 001

Field Sample ID	Date Collected	Date Received	Date Extracted	Max Holding Time Extracted (Days)	Time Held Extracted (Days)	Date Analyzed	Max Holding Time Analyzed (Days)	Time Held Analyzed (Days)	Q
Quarterly 001	Oct. 23, 2015	Oct. 23, 2015				Oct.28, 2015	180	5	P

XENCO Laboratories
CHRONOLOGY OF HOLDING TIMES

Analytical Method : Mercury, Total by EPA 245.1 **Client :** Diversified Environmental Services

Work Order #: 517998 **Project ID:** 001

Field Sample ID	Date Collected	Date Received	Date Extracted	Max Holding Time Extracted (Days)	Time Held Extracted (Days)	Date Analyzed	Max Holding Time Analyzed (Days)	Time Held Analyzed (Days)	Q
Quarterly 001	Oct. 23, 2015	Oct. 23, 2015				Oct.28, 2015	28	5	P

FTS ANALYTICAL SERVICES

XENCO Laboratories
CHRONOLOGY OF HOLDING TIMES

Analytical Method : Inorganic Anions by EPA 300

Client : Diversified Environmental Services

Work Order #: 517998

Project ID: 001

Field Sample ID	Date Collected	Date Received	Date Extracted	Max Holding Time Extracted (Days)	Time Held Extracted (Days)	Date Analyzed	Max Holding Time Analyzed (Days)	Time Held Analyzed (Days)	Q
Quarterly 001	Oct. 23, 2015	Oct. 23, 2015				Oct.28, 2015	28	5	P

XENCO Laboratories
CHRONOLOGY OF HOLDING TIMES

Analytical Method : VOAs by EPA 624

Client : Diversified Environmental Services

Work Order #: 517998

Project ID: 001

Field Sample ID	Date Collected	Date Received	Date Extracted	Max Holding Time Extracted (Days)	Time Held Extracted (Days)	Date Analyzed	Max Holding Time Analyzed (Days)	Time Held Analyzed (Days)	Q
Quarterly 001	Oct. 23, 2015	Oct. 23, 2015				Nov.2, 2015	7	10	F

XENCO Laboratories
CHRONOLOGY OF HOLDING TIMES

Analytical Method : SVOCs by EPA 625

Client : Diversified Environmental Services

Work Order #: 517998

Project ID: 001

Field Sample ID	Date Collected	Date Received	Date Extracted	Max Holding Time Extracted (Days)	Time Held Extracted (Days)	Date Analyzed	Max Holding Time Analyzed (Days)	Time Held Analyzed (Days)	Q
Quarterly 001	Oct. 23, 2015	Oct. 23, 2015	Oct. 28, 2015	7	5	Oct.28, 2015	40	0	P

XENCO Laboratories
CHRONOLOGY OF HOLDING TIMES

Analytical Method : TDS by SM2540C **Client :** Diversified Environmental Services

Work Order #: 517998 **Project ID:** 001

Field Sample ID	Date Collected	Date Received	Date Extracted	Max Holding Time Extracted (Days)	Time Held Extracted (Days)	Date Analyzed	Max Holding Time Analyzed (Days)	Time Held Analyzed (Days)	Q
Quarterly 001	Oct. 23, 2015	Oct. 23, 2015				Oct.27, 2015	7	4	P

FLORIDA flagging criteria

Data were reviewed by the
Department Supervisor and QA Director

A Value reported is the mean (average) of two or more determinations.

B Results based upon colony counts outside the acceptable range.

J Estimated value; value not accurate. All results with a "J" qualifier require comment.
- J1: Surrogate Recoveries exceed established QA/QC Limits
- J2: No known QA/QC exists.
- J3: Reported value failed to meet established QA/QC limits or the sample matrix interfered with the ability to make an accurate determination
- J4: The data is questionable due to improper laboratory or field protocols

Q Sample held beyond the accepted holding time

T Value reported is less than the laboratory method detection limit. The value is reported for informational purposes, only and shall not be used in statistical analysis.

U Compound was analyzed for but not detected at the MDL Level.

V Analyte was detected in both the sample and the associated method blank.

Y Laboratory analysis was from an unpreserved or improperly preserved sample. The data may not be accurate.

I The reported value is between the laboratory MDL and the laboratory PQL.

R Significant rain in the past 48 hours.

+ NELAC certification not offered for this compound.

***** (Next to analyte name or method description) = Outside XENCO's scope of NELAC accreditation

QC Summary 517998

Diversified Environmental Services

Quarterly

Analytical Method: pH by SM4500-H+ B
Seq Number: 980041 Matrix: Waste Water
Parent Sample Id: 517998-001 MD Sample Id: 517998-001 D

Parameter	Parent Result	MD Result	%RPD	RPD Limit	Units	Analysis Date	Flag
pH	7.42	7.42	0	20	SU	10.23.15 17:00	

Analytical Method: Metals per ICP by EPA 200.7
Prep Method: E200.7P
Seq Number: 980050 Matrix: Water
Date Prep: 10.28.15
MB Sample Id: 700051-1-BLK LCS Sample Id: 700051-1-BKS LCSD Sample Id: 700051-1-BSD

Parameter	MB Result	Spike Amount	LCS Result	LCS %Rec	LCSD Result	LCSD %Rec	Limits	%RPD	RPD Limit	Units	Analysis Date	Flag
Antimony	0.00730	1.00	1.05	105	1.06	106	85-115	1	20	mg/L	10.28.15 11:17	
Arsenic	<0.00400	1.00	1.05	105	1.09	109	85-115	4	20	mg/L	10.28.15 11:17	
Cadmium	<0.000300	1.00	1.06	106	1.06	106	85-115	0	20	mg/L	10.28.15 11:17	
Chromium	0.000400	1.00	1.07	107	1.07	107	85-115	0	20	mg/L	10.28.15 11:17	
Cobalt	<0.000900	1.00	1.08	108	1.09	109	85-115	1	20	mg/L	10.28.15 11:17	
Copper	0.00120	1.00	1.06	106	1.08	108	85-115	2	20	mg/L	10.28.15 11:17	
Lead	<0.00330	1.00	1.09	109	1.10	110	85-115	1	20	mg/L	10.28.15 11:17	
Nickel	<0.00170	1.00	1.06	106	1.07	107	85-115	1	20	mg/L	10.28.15 11:17	
Silver	<0.000600	0.100	0.0960	96	0.0959	96	85-115	0	20	mg/L	10.28.15 11:17	
Tin	<0.00560	10.0	2.07	21	2.10	21	85-115	1	20	mg/L	10.28.15 11:17	J
Titanium	<0.000960	1.00	1.07	107	1.08	108	85-115	1	20	mg/L	10.28.15 11:17	
Vanadium	<0.000800	1.00	1.07	107	1.08	108	85-115	1	20	mg/L	10.28.15 11:17	
Zinc	0.00140	1.00	1.06	106	1.06	106	85-115	0	20	mg/L	10.28.15 11:17	

Analytical Method: Metals per ICP by EPA 200.7
Prep Method: E200.7P
Seq Number: 980050 Matrix: Water
Date Prep: 10.28.15
Parent Sample Id: 518236-001 MD Sample Id: 518236-001 D

Parameter	Parent Result	MD Result	%RPD	RPD Limit	Units	Analysis Date	Flag
Antimony	<0.00500	<0.00500	0	20	mg/L	10.28.15 11:23	U
Arsenic	0.00720	<0.00400	NC	20	mg/L	10.28.15 11:23	U
Cadmium	<0.000300	<0.000300	0	20	mg/L	10.28.15 11:23	U
Chromium	0.00520	0.00550	6	20	mg/L	10.28.15 11:23	J
Cobalt	0.00760	0.00740	3	20	mg/L	10.28.15 11:23	J
Copper	0.0202	0.0203	0	20	mg/L	10.28.15 11:23	J
Lead	<0.00330	0.00890	NC	20	mg/L	10.28.15 11:23	J
Nickel	0.0306	0.0312	2	20	mg/L	10.28.15 11:23	
Silver	<0.000600	<0.000600	0	20	mg/L	10.28.15 11:23	U
Tin	<0.00560	<0.00560	0	20	mg/L	10.28.15 11:23	U
Titanium	0.0808	0.0794	2	20	mg/L	10.28.15 11:23	
Vanadium	0.0693	0.0680	2	20	mg/L	10.28.15 11:23	
Zinc	0.00620	0.00650	5	20	mg/L	10.28.15 11:23	J

QC Summary 517998

Diversified Environmental Services

Quarterly

Analytical Method: Metals per ICP by EPA 200.7 — Prep Method: E200.7P
Seq Number: 980050 — Matrix: Water — Date Prep: 10.28.15
Parent Sample Id: 518236-001 — MS Sample Id: 518236-001 S — MSD Sample Id: 518236-001 SD

Parameter	Parent Result	Spike Amount	MS Result	MS %Rec	MSD Result	MSD %Rec	Limits	%RPD	RPD Limit	Units	Analysis Date	Flag
Antimony	<0.00500	1.00	1.23	123	1.19	119	85-115	3	20	mg/L	10.28.15 11:25	J
Arsenic	0.00720	1.00	1.26	125	1.26	125	85-115	0	20	mg/L	10.28.15 11:25	J
Cadmium	<0.000300	1.00	1.21	121	1.19	119	85-115	2	20	mg/L	10.28.15 11:25	J
Chromium	0.00520	1.00	1.21	120	1.20	119	85-115	1	20	mg/L	10.28.15 11:25	J
Cobalt	0.00760	1.00	1.23	122	1.20	119	85-115	2	20	mg/L	10.28.15 11:25	J
Copper	0.0202	1.00	1.23	121	1.20	118	85-115	2	20	mg/L	10.28.15 11:25	J
Lead	<0.00330	1.00	1.22	122	1.19	119	85-115	2	20	mg/L	10.28.15 11:25	J
Nickel	0.0306	1.00	1.20	117	1.18	115	85-115	2	20	mg/L	10.28.15 11:25	J
Silver	<0.000600	0.100	0.110	110	0.108	108	85-115	2	20	mg/L	10.28.15 11:25	
Tin	<0.00560	10.0	2.21	22	2.16	22	85-115	2	20	mg/L	10.28.15 11:25	J
Titanium	0.0808	1.00	1.31	123	1.28	120	85-115	2	20	mg/L	10.28.15 11:25	J
Vanadium	0.0693	1.00	1.29	122	1.27	120	85-115	2	20	mg/L	10.28.15 11:25	J
Zinc	0.00620	1.00	1.25	124	1.22	121	85-115	2	20	mg/L	10.28.15 11:25	J

Analytical Method: Mercury, Total by EPA 245.1 — Prep Method: E245.1P
Seq Number: 980031 — Matrix: Water — Date Prep: 10.28.15
MB Sample Id: 700052-1-BLK — LCS Sample Id: 700052-1-BKS — LCSD Sample Id: 700052-1-BSD

Parameter	MB Result	Spike Amount	LCS Result	LCS %Rec	LCSD Result	LCSD %Rec	Limits	%RPD	RPD Limit	Units	Analysis Date	Flag
Mercury	<0.0000101	0.00300	0.00305	102	0.00303	101	85-115	1	20	mg/L	10.28.15 10:00	

Analytical Method: Mercury, Total by EPA 245.1 — Prep Method: E245.1P
Seq Number: 980031 — Matrix: Water — Date Prep: 10.28.15
Parent Sample Id: 518236-001 — MD Sample Id: 518236-001 D

Parameter	Parent Result	MD Result	%RPD	RPD Limit	Units	Analysis Date	Flag
Mercury	<0.0000101	<0.0000101	0	20	mg/L	10.28.15 10:09	U

Analytical Method: Mercury, Total by EPA 245.1 — Prep Method: E245.1P
Seq Number: 980031 — Matrix: Water — Date Prep: 10.28.15
Parent Sample Id: 518236-001 — MS Sample Id: 518236-001 S — MSD Sample Id: 518236-001 SD

Parameter	Parent Result	Spike Amount	MS Result	MS %Rec	MSD Result	MSD %Rec	Limits	%RPD	RPD Limit	Units	Analysis Date	Flag
Mercury	<0.0000101	0.00300	0.00301	100	0.00298	99	85-115	1	20	mg/L	10.28.15 10:12	

Final 1.000

QC Summary 517998

Diversified Environmental Services

Quarterly

Analytical Method: SVOCs by EPA 625 | Prep Method: E625P
Seq Number: 980179 | Matrix: Water | Date Prep: 10.28.15
MB Sample Id: 700090-1-BLK | LCS Sample Id: 700090-1-BKS | LCSD Sample Id: 700090-1-BSD

Parameter	MB Result	Spike Amount	LCS Result	LCS %Rec	LCSD Result	LCSD %Rec	Limits	%RPD	RPD Limit	Units	Analysis Date	Flag
2,4,6-Trichlorophenol	<0.00164	0.0500	0.0351	70	0.0378	76	37-144	7	30	mg/L	10.28.15 17:40	
bis(2-ethylhexyl) phthalate	<0.00120	0.0500	0.0487	97	0.0528	106	8-158	8	30	mg/L	10.28.15 17:40	
Fluoranthene	<0.00181	0.0500	0.0405	81	0.0412	82	26-137	2	30	mg/L	10.28.15 17:40	
2-methylphenol	<0.00200	0.0500	0.0328	66	0.0345	69	40-110	5	30	mg/L	10.28.15 17:40	
3&4-Methylphenol	<0.00255	0.0500	0.0330	66	0.0338	68	30-110	2	30	mg/L	10.28.15 17:40	
Carbazole	<0.000231	0.0500	0.0394	79	0.0418	84	50-115	6	25	mg/L	10.28.15 17:40	

Surrogate	MB %Rec	MB Flag	LCS %Rec	LCS Flag	LCSD %Rec	LCSD Flag	Limits	Units	Analysis Date
2-Fluorobiphenyl	83		71		76		39-99	%	10.28.15 17:40
2-Fluorophenol	85		58		69		33-92	%	10.28.15 17:40
2,4,6-Tribromophenol	91		83		90		32-129	%	10.28.15 17:40
Nitrobenzene-d5	84		64		72		37-94	%	10.28.15 17:40
Phenol-d5	81		66		73		50-200	%	10.28.15 17:40
Terphenyl-D14	90		75		83		18-133	%	10.28.15 17:40

Analytical Method: SVOCs by EPA 625 | Prep Method: E625P
Seq Number: 980179 | Matrix: Water | Date Prep: 10.28.15
MB Sample Id: 700090-1-BLK

Parameter	MB Result	Units	Analysis Date	Flag
n-Decane	U	mg/L	10.28.15 17:12	
n-Octadecane	U	mg/L	10.28.15 17:12	

QC Summary 517998

Diversified Environmental Services

Quarterly

Analytical Method: VOAs by EPA 624 | Prep Method: E624P
Seq Number: 980333 | Matrix: Water | Date Prep: 11.01.15
MB Sample Id: 700266-1-BLK | LCS Sample Id: 700266-1-BKS | LCSD Sample Id: 700266-1-BSD

Parameter	MB Result	Spike Amount	LCS Result	LCS %Rec	LCSD Result	LCSD %Rec	Limits	%RPD	RPD Limit	Units	Analysis Date	Flag
Acrolein	<3.50	40.0	30.1	75	32.1	80	40-140	6	20	ug/L	11.02.15 06:30	
Acrylonitrile	<0.490	40.0	34.2	86	37.0	93	40-140	8	20	ug/L	11.02.15 06:30	
Benzene	<0.160	20.0	18.5	93	19.7	99	37-151	6	20	ug/L	11.02.15 06:30	
Bromodichloromethane	<0.250	20.0	16.7	84	18.9	95	35-155	12	20	ug/L	11.02.15 06:30	
Bromoform	<0.170	20.0	16.1	81	17.0	85	45-169	5	20	ug/L	11.02.15 06:30	
Methyl bromide	<0.250	20.0	18.4	92	19.4	97	1-242	5	20	ug/L	11.02.15 06:30	
MTBE	<0.180	40.0	33.6	84	35.7	89	70-130	6	20	ug/L	11.02.15 06:30	
Carbon Tetrachloride	<0.330	20.0	15.7	79	17.5	88	70-140	11	20	ug/L	11.02.15 06:30	
Chlorobenzene	<0.150	20.0	18.4	92	20.0	100	37-160	8	20	ug/L	11.02.15 06:30	
Chloroethane	<0.260	20.0	15.9	80	18.7	94	14-230	16	20	ug/L	11.02.15 06:30	
2-Chloroethyl Vinyl Ether	<0.290	40.0	36.3	91	39.5	99	1-305	8	20	ug/L	11.02.15 06:30	
Chloroform	<0.160	20.0	18.1	91	19.8	99	51-138	9	20	ug/L	11.02.15 06:30	
Methyl Chloride	<0.250	20.0	16.5	83	17.3	87	1-273	5	20	ug/L	11.02.15 06:30	
Dibromochloromethane	<0.150	20.0	16.2	81	17.9	90	53-149	10	20	ug/L	11.02.15 06:30	
1,2-Dichlorobenzene	<0.140	20.0	19.1	96	21.0	105	18-190	9	20	ug/L	11.02.15 06:30	
1,3-Dichlorobenzene	<0.170	20.0	18.5	93	20.7	104	59-156	11	20	ug/L	11.02.15 06:30	
1,4-Dichlorobenzene	<0.170	20.0	18.8	94	21.0	105	18-190	11	20	ug/L	11.02.15 06:30	
Dichlorodifluoromethane	<1.00	20.0	17.4	87	17.5	88	70-130	1	23	ug/L	11.02.15 06:30	
1,2-Dichloroethane	<0.180	20.0	18.4	92	19.7	99	49-155	7	20	ug/L	11.02.15 06:30	
1,1-Dichloroethane	<0.110	20.0	16.9	85	18.1	91	59-155	7	20	ug/L	11.02.15 06:30	
trans-1,2-dichloroethylene	<0.210	20.0	16.6	83	18.8	94	54-156	12	20	ug/L	11.02.15 06:30	
cis-1,2-Dichloroethylene	<1.00	20.0	17.4	87	19.1	96	75-125	9	20	ug/L	11.02.15 06:30	
1,1-Dichloroethene	<0.200	20.0	17.2	86	18.9	95	1-234	9	20	ug/L	11.02.15 06:30	
1,2-Dichloropropane	<0.150	20.0	18.2	91	19.7	99	1-210	8	20	ug/L	11.02.15 06:30	
trans-1,3-dichloropropene	<0.110	20.0	14.8	74	16.1	81	17-183	8	20	ug/L	11.02.15 06:30	
cis-1,3-Dichloropropene	<0.100	20.0	15.0	75	17.2	86	1-227	14	20	ug/L	11.02.15 06:30	
Ethylbenzene	<0.190	20.0	18.2	91	19.9	100	37-162	9	20	ug/L	11.02.15 06:30	
1,1,2,2-Tetrachloroethane	<0.180	20.0	17.8	89	20.1	101	46-157	12	20	ug/L	11.02.15 06:30	
Toluene	<0.140	20.0	18.4	92	19.9	100	47-150	8	20	ug/L	11.02.15 06:30	
1,1,2-Trichloroethane	<0.250	20.0	18.7	94	20.3	102	52-150	8	20	ug/L	11.02.15 06:30	
1,1,1-Trichloroethane	<0.160	20.0	17.4	87	19.4	97	52-162	11	20	ug/L	11.02.15 06:30	
o-Xylene	<0.200	20.0	18.3	92	20.1	101	70-130	9	20	ug/L	11.02.15 06:30	
m,p-Xylenes	<0.510	40.0	36.7	92	40.5	101	70-130	10	20	ug/L	11.02.15 06:30	
Methylene Chloride	<0.420	20.0	17.4	87	18.6	93	1-221	7	20	ug/L	11.02.15 06:30	
Tetrachloroethylene	<0.160	20.0	26.4	132	28.2	141	64-148	7	20	ug/L	11.02.15 06:30	

Surrogate	MB %Rec	MB Flag	LCS %Rec	LCS Flag	LCSD %Rec	LCSD Flag	Limits	Units	Analysis Date
4-Bromofluorobenzene	99		99		99		30-186	%	11.02.15 06:30
1,2-Dichloroethane-D4	101		96		96		53-159	%	11.02.15 06:30
Toluene-D8	101		104		105		70-130	%	11.02.15 06:30

XENCO LABORATORIES

FTS ANALYTICAL SERVICES
CHAIN OF CUSTODY

Page _______ of _______

2505 N. Falkenburg Rd., Tampa, FL 33619 (813-620-2000) / 5675 New Tampa Hwy, Lakeland, FL 33815 (863-646-8526)
6017 Financial Drive, Norcross, GA 30071 (770-449-8800)

Company Name: Diversified Environmental Services	Receiver's Initials/Temp: _______ / _______
Address: 1801 N. 22nd St. Tampa FL 33605	Custody Seal(s): ___ Y N Lab Work Order # 517998
Results Sent to: Gerry McCormick	P.O.# (If required):
Email address:	Field Comments / Lab Precautions:
Contact Phone #: 813-248-3256 Cell#:	
Project Name (Site): Quarterly	Analysis Requested
Project Number (ID): 001 Container Type	
Regulatory Program: Preservation Code	
Sampler(s): (signature) [signature] Sampler(s): (printed) M. Berezowski	

Line No.	Sample ID #	Sample Depth (Ft)	Collection Date / Time	Matrix (See below)	Composite	Grab	No. of Containers	8260	TDS, pH	Cl	SVOC 8270	Metals										
1	Quarterly 001		10/23/15 0908	WW			6	2	1	1	1	1										
2																						
3																						
4																						
5																						
6																						
7																						
8																						
9																						
10																						

1) Relinquished By: M. Berezowski	Date / Time 10/23/15 1130	2) Received By: [signature]	Date / Time 10/23/15 1130	Delivered by: (Circle One) Fed Ex / UPS / Courier / Lab Pickup / Hand / Other
3) Relinquished By:	Date / Time	4) Received By:	Date / Time	Turnaround Time (business days)
5) Relinquished By:	Date / Time	6) Received By:	Date / Time	___10 Days ; ___5-7 Days; ___3 Days ___2 Days ; ___1 Day; ___Same Day

Matrix Guide: (W=Water) (DW = Drinking Water) (GW = Groundwater) (SW = Surface Water) (L = Liquid) (O = Oil) (S = Soil) (SD = Solid) (SL = Sludge) (A = Air) (C = Air Cartridge)

Preservation: 1 = HCL 2 = HNO_3 3 = H_2SO_4 4 = NaOH + $NaAsO_2$ 5 = NaOH + ZnAc 6 = $Na_2S_2O_3$ 7 = DI Water & MeOH 8 = NaHSO4 & MeOH 9 = None 10 = NaHSO4

Container Type: VC=Vial (Clear); VA =Vial (Amber); GC=Glass (Clear); GA=Glass (Amber); P=Plastic (HDPE); TB=Tedlar Bag; ES=EnCore Sampler; ZB=Ziploc Bag; O=Other

VOLUME 2 OF 3

Permit Modification Application

FOR

Modification Application for Operation of a Hazardous Waste Treatment and Storage Facility

AT

7202 East 8th Avenue
Tampa, FL 33619

Permit No.: 34875-HO-011

EQ Florida, Inc.
7202 East 8th Avenue
Tampa, FL 33619

Revision: 01
May 13, 2016

CONTENTS – VOLUME 2 OF 3

APPENDIX A

Articles of Incorporation

APPENDIX B

Summary of Permitted EPA Hazardous Waste Codes

EQ FLORIDA INC.

Summary of Characteristic and Listed Hazardous Wastes

Proces Code	Process Design Capacity and Units of Measure	Hazardous Waste Code(s)	Annual Quantity of Hazardous Waste (Gallons)[2]
S01	The permitted maximum capacity of 50,000 gallons is not exceeded at any time.	D001	1,174,068
S01		D003	90,720
S01		F001 & F002	148,102
S01		F003 & F005	339,703
S01		F006-F012 & F019	76,769
S01		"F" listed Wastes (Excluding F001, F002, F003, F005-F012 & F019)	125
S01		"K" Listed Wastes	11,000
S01		"U" Listed Waste	74,269
		TOTAL =	1,914,756

T21[1]	"D" Characteristic Waste (Excluding D001 & D003)	713,601
T21[1]	K062	10,000
	TOTAL =	723,601

1/ Chemical fixation/solidification/stabilization in the treatment tank.

2/ Based on actual volume of waste processed during CY 2015.

Total Existing & Proposed Hazardous Waste Storage Capacities

Existing	
Container Storage Building (CSB) Bay 1	20,000 Gallons[3]
Container Storage Building (CSB) Bay 2	10,000 Gallons[3]
Container Storage Building (CSB) Bay 3	20,000 Gallons[3]
Improved Secondary Containment (ISC)	10,000 Gallons[3]
Inbound/Outbound Staging Area (I/O)	10,000 Gallons[3]
10-Day Transfer Area	20,000 Gallons or 100 Cubic Yards

Proposed	
Bulk Container Storage Areas (BCSA)	800 Cubic Yards
Waste Processing Building (WPB)	4,400 Gallons

3/ Provided the permitted maximum capacity of 50,000 gallons is not exceeded at any time.

Each bay may contain hazardous wastes with any of the EQ permitted waste codes. The hazardous waste is segregated into separate bays (and containment) by hazard class and compatibility, not by waste code.

EQ Florida, Inc.

PERMITTED HAZARDOUS WASTE CODES

CHARACTERISTIC WASTE

D001 D002 D003 D004 D005 D006 D007 D008 D009 D010 D011 D012 D013 D014 D015 D016 D017 D018
D019 D020 D021 D022 D023 D024 D025 D026 D027 D028 D029 D030 D031 D032 D033 D034 D035 D036
D037 D038 D039 D040 D041 D042 D043

HAZARDOUS WASTE FROM NON-SPECIFIC SOURCES

F001 F002 F003 F004 F005 F006 F007 F008 F009 F010 F011 F012 F019 F020 F021 F022 F023 F024
F025 F026 F027 F028 F032 F034 F035 F037 F038 F039

HAZARDOUS WASTE FROM SPECIFIC SOURCES

K001 K002 K003 K004 K005 K006 K007 K008 K009 K010 K011 K013 K014 K015 K016 K017 K018 K019
K020 K021 K022 K023 K024 K025 K026 K027 K028 K029 K030 K031 K032 K033 K034 K035 K036 K037
K038 K039 K040 K041 K042 K043 K044 K045 K046 K047 K048 K049 K050 K051 K052 K060 K061 K062
K069 K071 K073 K083 K084 K085 K086 K087 K088 K093 K094 K095 K096 K097 K098 K099 K100 K101
K102 K103 K104 K105 K106 K107 K108 K109 K110 K111 K112 K113 K114 K115 K116 K117 K118 K123
K124 K125 K126 K131 K132 K136 K141 K142 K143 K144 K145 K147 K148 K149 K150 K151 K161

DISCARDED COMMERCIAL CHEMICAL PRODUCTS, OFF-SPECIFICATION SPECIES, CONTAINER RESIDUES AND SPILL RESIDUES THEREOF

P001 P002 P003 P004 P005 P006 P007 P008 P009 P010 P011 P012 P013 P014 P015 P016 P017 P018
P020 P021 P022 P023 P024 P026 P027 P028 P029 P030 P031 P033 P034 P036 P037 P038 P039 P040
P041 P042 P043 P044 P045 P046 P047 P048 P049 P050 P051 P054 P056 P057 P058 P059 P060 P062
P063 P064 P065 P066 P067 P068 P069 P070 P071 P072 P073 P074 P075 P076 P077 P078 P081 P082
P084 P085 P087 P088 P089 P092 P093 P094 P095 P096 P097 P098 P099 P101 P102 P103 P104 P105
P106 P108 P109 P110 P111 P112 P113 P114 P115 P116 P118 P119 P120 P121 P122 P123 P127 P128
P185 P188 P189 P190 P191 P192 P194 P196 P197 P198 P199 P201 P202 P203 P204 P205

U001 U002 U003 U004 U005 U006 U007 U008 U009 U010 U011 U012 U014 U015 U016 U017 U018 U019
U020 U021 U022 U023 U024 U025 U026 U027 U028 U029 U030 U031 U032 U033 U034 U035 U036 U037
U038 U039 U041 U042 U043 U044 U045 U046 U047 U048 U049 U050 U051 U052 U053 U055 U056 U057
U058 U059 U060 U061 U062 U063 U064 U066 U067 U068 U069 U070 U071 U072 U073 U074 U075 U076
U077 U078 U079 U080 U081 U082 U083 U084 U085 U086 U087 U088 U089 U090 U091 U092 U093 U094
U095 U096 U097 U098 U099 U101 U102 U103 U105 U106 U107 U108 U109 U110 U111 U112 U113 U114
U115 U116 U117 U118 U119 U120 U121 U122 U123 U124 U125 U126 U127 U128 U129 U130 U131 U132
U133 U134 U135 U136 U137 U138 U140 U141 U142 U143 U144 U145 U146 U147 U148 U149 U150 U151
U152 U153 U154 U155 U156 U157 U158 U159 U160 U161 U162 U163 U164 U165 U166 U167 U168 U169
U170 U171 U172 U173 U174 U176 U177 U178 U179 U180 U181 U182 U183 U184 U185 U186 U187 U188
U189 U190 U191 U192 U193 U194 U196 U197 U200 U201 U203 U204 U205 U206 U207 U208 U209 U210
U211 U213 U214 U215 U216 U217 U218 U219 U220 U221 U222 U223 U225 U226 U227 U228 U234 U235
U236 U237 U238 U239 U240 U243 U244 U246 U247 U248 U249 U271 U278 U279 U280 U328 U353 U359
U364 U367 U372 U373 U387 U389 U394 U395 U404 U409 U410 U411

Gaskin, Nancy

From: Gaskin, Nancy
Sent: Friday, May 03, 2013 1:46 PM
To: 'lance.hauer@ge.com'
Cc: Russell, Merlin; McGinnis, Sean; Pelz, Susan; Watson, Stephanie M.; 'mlodato@geosyntec.com'
Subject: UNC Recover Inc. ME# 38188 Compliance Inspection 4-10-2013
Attachments: UNC Recovery Inc.pdf

Categories: Oculized

Dear Mr. Hauer,

The Department conducted a solid waste inspection of the UNC Recovery Inc. The facility appeared to be in-compliance, based on the areas evaluated. Please see the attached inspection report.

The Department appreciates your efforts to maintain this facility in compliance with state rules. Should you have any questions or comments, please contact Nancy Gaskin at (813) 632-7600, ext. 333 or via e-mail: Nancy.Gaskin@dep.state.fl.us .

Sincerely,

On behalf of: Susan J. Pelz, P.E., Environmental Manager, Compliance/Enforcement Section

Florida Department of Environmental Protection - Southwest District
13051 North Telecom Parkway
Temple Terrace, Fl 33637-0926
susan.pelz@dep.state.fl.us
813/632.7600 Ext. 336
813/632.7664 Fax

Nancy D. Gaskin
FDEP South West District
13051 N. Telecom Parkway
Temple Terrace, FL 33637
(813)632-7600 x 333
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Nancy D. Gaskin
FDEP South West District
13051 N. Telecom Parkway
Temple Terrace, FL 33637
(813)632-7600 x 333
Nancy.Gaskin@Dep.State.Fl.us

Gaskin, Nancy

From: Russell, Merlin
Sent: Tuesday, April 09, 2013 11:15 AM
To: Gaskin, Nancy
Cc: Tripp, Anthony; Knauss, Elizabeth; McGinnis, Sean
Subject: FW: Tomorrow

Hi Nancy,

I just called you and left a message but thought that if we don't connect, I'd e-mail you (see note below). If you arrive at 10:00, your inspection will be done before we get there.

UNC is in the middle of performing additional assessment, and will be there most of the week. Tom Wurzinger (Geosyntec) and I want to walk to a couple of areas that would be ideal (location-wise) for wells but might be a challenge with the rigs. We don't have any specific issues to discuss. Lance Hauer (GE-responsible party) will be there. It will be his first visit to the site. I have never met him. I don't think we'll be too long, maybe 3:00ish as we want to drive up to Clean Harbors for a short stop on our way to a meeting Thursday morning in Orlando. Have you been assigned to Clean Harbors? Again, I have never been to CH and have not met Bruce Riffel who is fairly new at CH.

Call if you wish to discuss. Also, my cell is 850-591-8178.

merlin

From: Russell, Merlin
Sent: Tuesday, April 09, 2013 8:06 AM
To: 'Tom Wurzinger'
Cc: 'Todd Hagemeyer'; 'lance.hauer@ge.com'
Subject: Tomorrow

Tom,

I know we talked last week but I am just confirming tomorrow's visit. Hope field activities are going smoothly.

Tony and I plan to leave here at 6:30 in the morning, and will grab a quick bite to eat once we get to Mulberry. Should be at UNC 12:30-1:00ish.

merlin

Merlin D. Russell Jr.
Professional Geologist II
Hazardous Waste Regulation Section, Room 330G
Florida Department of Environmental Protection
2600 Blair Stone Road
Tallahassee, Florida 32399-2600
850.245.8796 (work)
merlin.russell@dep.state.fl.us
Monday-Thursday, 7:00 a.m.-4:30 p.m.; Fridays, 7:00 a.m.-11:00 a.m.

1. INTRODUCTION

Geosyntec Consultants (Geosyntec) has prepared this groundwater monitoring report for the former UNC Recovery Corporation (UNCRC) facility located near Mulberry, Florida (Site). This report describes the 18th semi-annual sampling event conducted since completion of the remediation activities in February 2004. This report details the results of the semi-annual sampling event conducted in October 2012.

1.1 Location

The Site is located four miles southeast of Mulberry, Florida in Township 30 S, Range 24 E, Section 30 in southwestern Polk County at the northwest corner of the intersection of Polk County Road 640 and Bonnie Mine Road (Figure 1). The property is approximately 55 acres in size, approximately 18 acres of which were formerly used in facility operations. The Site is situated in an area dominated by phosphate mining operations including numerous phosphate ore processing plants, chemical processing plants, and gypsum stacks. Surrounding properties include Mosaic to the east; CTL Trucking facilities and Mosaic to the north; and Mobil Chemical to the south (Figure 2).

1.2 Site History

The Site was formerly operated as a metals reclamation facility (Figure 3). The location of the former process area for the metals reclamation operations at the Site is shown on Figure 3. Metals reclamation activities ceased in 1991. In April 1998, UNCRC notified the Florida Department of Environmental Protection (FDEP) of its intent to characterize residual materials remaining at the Site to ensure proper disposal and to dismantle the facility. A Source Removal Action (SRA) was performed by UNCRC in 1998 (Environmental Consulting & Technology, 1999) under oversight and approval of FDEP. As part of the SRA, all facility structures and tanks were characterized, decontaminated, and removed from the Site. In 1999, UNCRC entered into a Consent Order (CO) with FDEP for Site characterization and closure under the provisions of the Florida Resource Recovery and Management Act, Sections 403.702, et seq. Florida Statutes and the rules promulgated there under; and Florida Administrative Code (FAC) Chapter 62-730. The CO defined the former 24 hazardous waste tanks in the former process area as a Hazardous Waste Management Unit (HWMU).

From October 1999 to October 2003, Site characterization activities, including soil, groundwater, surface water, and sediment sampling, were completed to determine the nature and extent of contamination at the Site.

From December 2003 to February 2004, a remedial action was completed in the former process area. The three areas remediated include the Dissolution Area, Nickel Extraction Area, and Cadmium Extraction Area, referred to as Areas of Concern (AOCs) 4, 6, and 7, respectively. Figure 3 shows the location of the AOCs where remediation activities were completed. The remedial action consisted of the excavation, removal, stabilization, and disposal of approximately 700 tons of subsurface soils. The characterization and remediation of the Site are described in the Contamination Assessment and Closure Report (CACR) (GeoTrans, 2005).

Semi-annual groundwater and surface water performance monitoring is being conducted in accordance with the FDEP-approved Groundwater Monitoring Plan presented in the CACR to monitor the effectiveness of the remedy and to confirm that groundwater quality is stable or improving. Figure 3 shows the location of the monitoring wells and surface water sample stations that form the performance monitoring network.

In August 2006 the property was acquired by Fat Chance, LLC in a tax sale. Concrete septic tank construction activities now occur at the Site. UNCRC, however, remains the party responsible for performing assessment and closure activities in accordance with the 1999 CO between UNCRC and FDEP. A Declaration of Restrictive Covenant (DRC) has been recorded on the deed and was also submitted to FDEP for review on 23 March 2008. UNCRC is in the process of finalizing the DRC with FDEP. UNCRC and FDEP are working collectively to notify easement holders. Once complete, the final Restrictive Covenant will also be recorded on the deed.

In April 2011 an off-site groundwater investigation for arsenic was performed. Three temporary off-site monitoring wells were installed southwest of the site, in the right-of-way of County Road 640. Arsenic was detected in groundwater, at an estimated concentration (9.9 I µg/L), in temporary monitoring well TW-1 and was not detected at TW-2 and TW-3. FDEP requested that well TW-1 be re-sampled for arsenic during the October 2011 sampling event and arsenic was detected at 13 µg/L. Based on discussions with FDEP, an "Initial Notice of Contamination Beyond Property Boundaries" was submitted in December 2011 and off-site monitoring wells TW-1 and

Florida Department of Environmental Protection

Southwest District
13051 North Telecom Parkway
Temple Terrace, Florida 33637-0926
Telephone: 813-632-7600

Rick Scott
Governor

Jennifer Carroll
Lt. Governor

Herschel T. Vinyard Jr.
Secretary

February 28, 2011

Lance Hauer
Project Manager
c/o GECEP 640 Freedom Business Center
King of Prussia, PA 19406

Re: Former UNC Reclamation site
EPA ID Number: FLD 984 166 942
Polk County

Dear Mr. Hauer:

Please thank Mr. Spencer for his assistance and cooperation during the Florida Department of Environmental Protection's January 20, 2011 Hazardous Waste Compliance Evaluation Inspection.

Enclosed is a copy of the inspection report generated from this visit. If you have any questions or concerns regarding this report or the inspection, please feel free to contact me at (813) 632-7600, extension 473 or Shannon.d.camp@dep.state.fl.us.

Sincerely,

Shannon Camp
Environmental Specialist
Division of Waste Management
Southwest District

Enclosures

cc: Joseph Tripp, Fat Chance, LLC (Electronic)
Merlin Russell, HWR Tallahassee (Electronic)
Mike Lodato, Geosyntec (Electronic)

Inserted into OCULUS
MAR -7 2011
Initials: _____

Florida Department of
Environmental Protection
Hazardous Waste Inspection Report

FACILITY INFORMATION:

Facility Name: UNC Recovery Corp

On-Site Inspection Start Date: 01/20/2011 **On-Site Inspection End Date:** 01/20/2011

ME ID#: 38188 **EPA ID#:** FLD984166942

Facility Street Address: 6172 SR 640, Mulberry, Florida 33860

Contact Mailing Address: C/O GECEP 640 Freedom Business Ctr, King Of Prussia, Pennsylvania 19406

County Name: Polk **Contact Phone:** (610) 992-7972

NOTIFIED AS:

Non-Handler
TSD Facility Unit Type(s)

INSPECTION TYPE:

Routine Inspection for TSD Facility Unit Type(s)

INSPECTION PARTICIPANTS:

Principal Inspector: Shannon D. Camp, Inspector

Other Participants: John Spencer

LATITUDE / LONGITUDE: Lat 27° 50' 43.5722" / Long 81° 57' 0.1641"

SIC CODE: 3341 - Manufacturing - secondary nonferrous metals

TYPE OF OWNERSHIP: Private

Introduction:

The former UNC Reclamation property was inspected on January 20, 2011 to ensure the facility's compliance with state and federal hazardous waste regulations and to ensure compliance with the Consent Order dated September 8, 1999. This property was last inspected in August 2008.

Process Description:

From 1977-1980, UNC Recovery Corp. conducted a uranium recovery process on the property. In 1988, a separate, indirect subsidiary of UNC called Reclamation, Inc. (UNCREC) began operating a metals reclamation process. UNCREC filed for bankruptcy in 1991 and abandoned various materials and chemicals on the property. In 1993, EPA conducted soil sampling on the property in areas where visible discharges had occurred. The soil was found to contain hazardous levels of leachable cadmium. UNC was acquired by Greenwich Air Services Inc. which was later acquired by General Electric Company (GE). In 1998, GE entered into a Consent Order with the Department. The order required the removal of contaminated soil and semi-annual groundwater monitoring. In 2006, the property was acquired by Fat Chance, LLC; however, GE is still responsible for the clean-up and groundwater monitoring for this site.

Summary of Potential Violations and Areas of Concern:

Potential Violations

No Violations

Areas of Concern

No Areas of Concern

Conclusion:

At the time of the inspection, the former UNC Reclamation site appeared to be in compliance with the Consent Order. All the active monitoring wells were inspected and found to be in satisfactory condition. Numerous warning signs were also observed posted throughout the site. It did not appear as if the current property occupants, which lease the site from Fat Chance, LLC, has disturbed the soil onsite. A small portion of the fence on the southeast side of the property was missing. It appeared as though there had been a gate in the area in the past that allowed access to a small pond. This was immediately addressed by Geosyntec personnel.

Signed:

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

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

Shannon D. Camp	Inspector
PRINCIPAL INSPECTOR NAME	**PRINCIPAL INSPECTOR TITLE**
SC	2/8/2011
PRINCIPAL INSPECTOR SIGNATURE	**DATE**
John Spencer	
REPRESENTATIVE NAME	
NO SIGNATURE	Geosyntec
REPRESENTATIVE SIGNATURE	**ORGANIZATION**

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

Coogle, Deon

From: Microsoft Exchange
To: Russell, Merlin
Sent: Monday, February 28, 2011 9:32 AM
Subject: Delivered: Former UNC Reclamation Site - Inspection Report Letter

Your message has been delivered to the following recipients:

Russell, Merlin

Subject: Former UNC Reclamation Site - Inspection Report Letter

---

Sent by Microsoft Exchange Server 2007

Coogle, Deon

From: Microsoft Exchange
To: 'mlodato@geosyntec.com'
Sent: Monday, February 28, 2011 9:32 AM
Subject: Relayed: Former UNC Reclamation Site - Inspection Report Letter

Delivery to these recipients or distribution lists is complete, but delivery notification was not sent by the destination:

'mlodato@geosyntec.com'

Subject: Former UNC Reclamation Site - Inspection Report Letter

---

Sent by Microsoft Exchange Server 2007

Florida Department of

Memorandum **Environmental Protection**

SOUTHWEST DISTRICT ENFORCEMENT COVER MEMO

TO: James Dregne, Hazardous Waste Program Manager 2/28

THROUGH: Elizabeth Knauss, HW Enforcement Coordinator

FROM: SDC Shannon Camp, Environmental Specialist II

DATE: February 22, 2011

FILE NAME: Fmr UNC Recovery COUNTY: Polk

PROGRAM: Hazardous Waste

TYPE OF DOCUMENT: ~~Draft~~ Inspection Report

REQUESTED ACTION: ~~Review~~

DESCRIPTION OF VIOLATIONS: none (opening in fence addressed)

STATUS OF CORRECTIVE ACTIONS: corrected

Attachments:

To be sent via email to:
mlodato@geosyntec.com
jspencer@geosyntec.com
trippco@verizon.net

Camp, Shannon D.

From: JSpencer@Geosyntec.com
Sent: Wednesday, February 23, 2011 4:12 PM
To: Camp, Shannon D.
Cc: MLodato@Geosyntec.com
Subject: RE: Former UNC site
Attachments: 006.jpg; 007.jpg; 005.jpg

Hi Shannon,

The issues regarding adding a gate to the opening in the site fence and the new number for the FDEP signs were recently addressed at the former UNC site. I have included a few pictures for your records. Please let me know if you have any questions or need any additional information.

Sincerely,

John Spencer.
Senior Staff Hydrogeologist

13101 Telecom Drive
Suite 120
Temple Terrace, FL 33637
Phone: 813.558.0990
Fax: 813.558.9726
Mobile: 813.918.4756
www.Geosyntec.com

From: Camp, Shannon D. [mailto:Shannon.D.Camp@dep.state.fl.us]
Sent: Monday, February 21, 2011 10:25 AM
To: Mike Lodato
Subject: Former UNC site

Mr. Lodato:

Have the fence and signs been fixed? I'm in the process of drafting the report and those items must be addressed before I can submit it.

Sincerely,

Shannon Camp
Department of Environmental Protection
Environmental Specialist II
Hazardous Waste Section
(813) 632-7600 x 473

The Department of Environmental Protection values your feedback as a customer. DEP Secretary Herschel T. Vinyard Jr. is committed to continuously assessing and improving the level and quality of services provided to you. Please take a few minutes to comment on the quality of service you received. Simply click on this link to the DEP Customer Survey. Thank you in advance for completing the survey.


WARNING
NO TRESPASSING!
CONTAMINATED AREA
AVOID CONTACT WITH
SOIL AND WATER
FOR INFORMATION
CALL FDEP SOUTHWEST DISTRICT
(866) 282-0787

Florida Department of
Environmental Protection

Southwest District Office
13051 North Telecom Parkway
Temple Terrace, Florida 33637-0926

Charlie Crist
Governor

Jeff Kottkamp
Lt. Governor

Michael W. Sole
Secretary

September 30, 2008

Lance Hauer
Project Manager
c/o GECEP 640 Freedom Business Center
King of Prussia, PA 19406

Re: Former UNC Reclamation site
FLD 984 166 942
Polk County

Dear Mr. Hauer:

Please thank Mr. Lucien Tender and Mr. Tripp for their assistance and cooperation during the Department of Environmental Protection's August 27, 2008 Hazardous Waste Compliance Evaluation Inspection.

Enclosed is the inspection report generated from this visit. Based upon the information gathered during the inspection, the former UNC Reclamation site was found to be in compliance with the 1998 Consent Order.

If you have any questions, please feel free to call me at (813) 632-7600, extension 473.

Sincerely,

Shannon Camp
Environmental Specialist II
Division of Waste Management
Southwest District

Enclosures

cc. Andrea Stermer, Polk Co.
Lucien Tender; Geosyntec
Joseph Tripp, Fat Chance, LLC
Tony Tripp, HWR Tallahassee

FLORIDA DEPARTMENT OF ENVIRONMENTAL PROTECTION

HAZARDOUS WASTE INSPECTION REPORT

Facility Information:

Facility Name: UNC Recovery Corp

On-Site Inspection Start Date: 08/27/2008

On-Site Inspection End Date: 08/27/2008

ME ID#: 38188

EPA ID#: FLD984166942

Facility Street Address: 6172 SR 640, Mulberry, Florida 33860

Mailing Address: 640 Freedom Business Ctr Dr, King Of Prussia, PA 19406-1332

County Name: Polk

Phone: (610) 992-7972

NOTIFIED AS:

Non-Handler

TSD Facility Unit Type(s)

CURRENT STATUS:

Non-Handler

TSD Facility Unit Type(s)

FACILITY TYPE:

TSD Facility Unit Type(s)

INSPECTION TYPE:

Routine

Inspection Participants:

Principal Inspector: Shannon D Camp

Other Participants: Lucien Tender, Joseph Tripp

LATITUDE / LONGITUDE: Lat 27° 50' 43.5722" / Long 81° 57' 0.1641"

SIC CODE: 3341 - Manufacturing - secondary nonferrous metals

TYPE OF OWNERSHIP:

Private

FLORIDA DEPARTMENT OF ENVIRONMENTAL PROTECTION

HAZARDOUS WASTE INSPECTION REPORT

Introduction:

The former UNC Reclamation property was inspected on August 27, 2008 to ensure the facility's compliance with state and federal hazardous waste regulations and to ensure compliance with the Consent Order dated September 8, 1999. Mr. Lucien Tender of Geosyntec and Mr. Joseph Tripp of Fat Chance, LLC. accompanied the inspector throughout the inspection. This property was last inspected in June 2006.

Process Description:

From 1977-1980, UNC Recovery Corp. conducted a uranium recovery process on the property. In 1988, a separate, indirect subsidiary of UNC called Reclamation, Inc. (UNCREC) began operating a metals reclamation process. UNCREC filed for bankruptcy in 1991 and abandoned various materials and chemicals on the property. In 1993, EPA conducted soil sampling on the property in areas where visible discharges had occurred. The soil was found to contain hazardous levels of leachable cadmium. UNC was acquired by Greenwich Air Services Inc. which was later acquired by General Electric Company (GE). In 1998, GE entered into a Consent Order with the Department. The order required the removal of contaminated soil and semi-annual groundwater monitoring. In 2006, the property was acquired by Fat Chance, LLC; however, GE is still responsible for the clean up and groundwater monitoring for this site.

Violations Summary

Violations

No Violations

Areas of Concern

No Areas of Concern

Conclusion:

At the time of the inspection, the former UNC Reclamation site appeared to be in compliance with the Consent Order. Multiple monitoring wells were inspected and found to be in satisfactory condition. Numerous warning signs were also observed posted throughout the site. It did not appear as if the current property occupants, which lease the site from Fat Chance, LLC, has disturbed the soil onsite

Signed:

FDEP - SWD	Geosyntec
ORGANIZATION	**ORGANIZATION**
Environmental Specialist II	Project Engineer
PRINCIPAL INSPECTOR TITLE	**REPRESENTATIVE TITLE**
Shannon D Camp	Lucien Tender
PRINCIPAL INSPECTOR NAME	**REPRESENTATIVE NAME**
	NO SIGNATURE REQUIRED
PRINCIPAL INSPECTOR SIGNATURE	**REPRESENTATIVE SIGNATURE**
9/15/2008	
DATE	

FLORIDA DEPARTMENT OF ENVIRONMENTAL PROTECTION

HAZARDOUS WASTE INSPECTION REPORT

Fat Chance LLC
ORGANIZATION

Owner
REPRESENTATIVE TITLE

Joseph Tripp
REPRESENTATIVE NAME

NO SIGNATURE REQUIRED
REPRESENTATIVE SIGNATURE

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

Florida Departm

Memorandum **Environmental Prote**

SOUTHWEST DISTRICT ENFORCEMENT COVER MEMO

TO: James Dregne, Hazardous Waste Program Manager 9/29

THROUGH: Elizabeth Knauss, HW Enforcement Coordinator

FROM: Shannon Camp, Environmental Specialist

DATE: September 25, 2008

FILE NAME: Fmr. UNC Reclamation COUNTY: Polk

PROGRAM: Hazardous Waste

TYPE OF DOCUMENT: Inspection Report

REQUESTED ACTION: Review

DESCRIPTION OF VIOLATIONS: None

STATUS OF CORRECTIVE ACTIONS: None

STATUS OF PENALTY ASSESSMENT: NONE

PENALTY: ☒ Not Applicable Amount: $

Costs & Expenses: $

Total: $

Secretary Approval ☒ Not required / Approved on _____

Attachments:

FLD984166942

Former UNC Reclamation

UNC RECLAMATION

FFY '06 COMPLIANCE INSPECTION

PROJECT #298544

Compliance Inspection Date: June 2, 2006 8:45 am

Inspector: Al Gephart

A site inspection eas conducted on June 2, 2006. All of the buildings previously at the site have been razed. I walked throughout the site observing former areas of activity and checking the groundwater monitoring wells. There was no sign of any activity at the site except for four (4) drums of monitoring well purge development water dated April 14, 2006, awaiting analysis. Of the eight (8) groundwater monitoring wells observed, all appeared to be in good condition. Three of the eight were locked preventing inspection.

Attached are photos from this site visit.

Albert F. Gephart
Engineering Specialist IV

6/6/06
Date

UNC RECLAMATION

FFY '06 COMPLIANCE INSPECTION

PROJECT #298544

PHOTO LOG

PHOTO NO	DESCRIPTION
1	Entrance to the property off of County Road 640 (1.7 miles east of Hwy. 37).
2	Entrance to the property.
3	Sign On Entrance Gate.
4	Monitoring well #12 near entrance.
5	Cement Pad.
6	Four drums of groundwater monitoring well purge development water (4/14/06).
7	Label on 4 drums of groundwater monitoring well purge development water.
8	Pad in Photo #5 – Gate Valves.
9	Canal Gate Valve.
10	Additional pad NE of gate valves and 1st cement pad.
11	Monitoring Well. Looking south from 1st cement pad.
12	Monitoring Well just east of the well in photo #11.
13	Monitoring Well at 2nd cement pad from 1st cement pad.
14	Poured pentagonal structure and monitoring well on right.
15	Two Monitoring Wells south of poured structure.
16	Bridge across creek southeast of pentagonal structure.
17	Looking east towards entrance gate from Monitoring Wells in photo #16.
18	Looking west toward pentagonal structure; opposite direction of photo #15.
19	Looking north toward pentagonal structure.
20	Looking south from back side of property.
21	Looking south from cemented area at rear of former structure.
22	Drive along rear of property. There are 3 cement pads off of it.
23	Pad #2 from road along rear of property.
24	Pad #3 from road along rear of property.
25	Large pad at end of road shown in photo #22.
26	Another road going east and west from photo #25; east of drive along rear of property.
27	Another big cement pad northwest of photo #26.
28	Fence line northeast of where photo #27 was taken.
29	Another cement pad south of where photo #28 was taken.
30	Blacktop area northwest of photo #27.
31	Monitoring Well north of photo #29.
32	Rectangular area near entrance gate with 3 plates, each with water beneath them.
33	35 One of the plates in rectangular area shown in photo #32.

#2


WARNING!
NO TRESPASSING!
WASTE SITE STUDY AREA
AVOID CONTACT WITH
SOIL AND WATER
FOR INFORMATION
813-744-6100

#3

#4

5

#6


THIS CONTAINER ON HOLD
PENDING ANALYSIS
CONTENTS:
INVESTIGATION-DERIVED WASTES
WASTE GENERATION START DATE:
ORIGIN OF MATERIALS:
FDEP FACILITY ID #:
ADDRESS:
PHONE:
OR
FLORIDA DEPARTMENT OF ENVIRONMENTAL PROTECTION
HAZARDOUS WASTE CLEANUP SECTION
2600 BLAIR STONE ROAD
TALLAHASSEE, FLORIDA 32399
(850) 245-8927
OR
24 HOUR - EMERGENCY
FLORIDA STATE WARNING POINT
RESIDENTIAL (800) 320-0519
DO NOT TAMPER WITH CONTAINER
AUTHORIZED PERSONNEL ONLY

#7

#8

#9

#10

#11

#12

#13

#14

#15

#16

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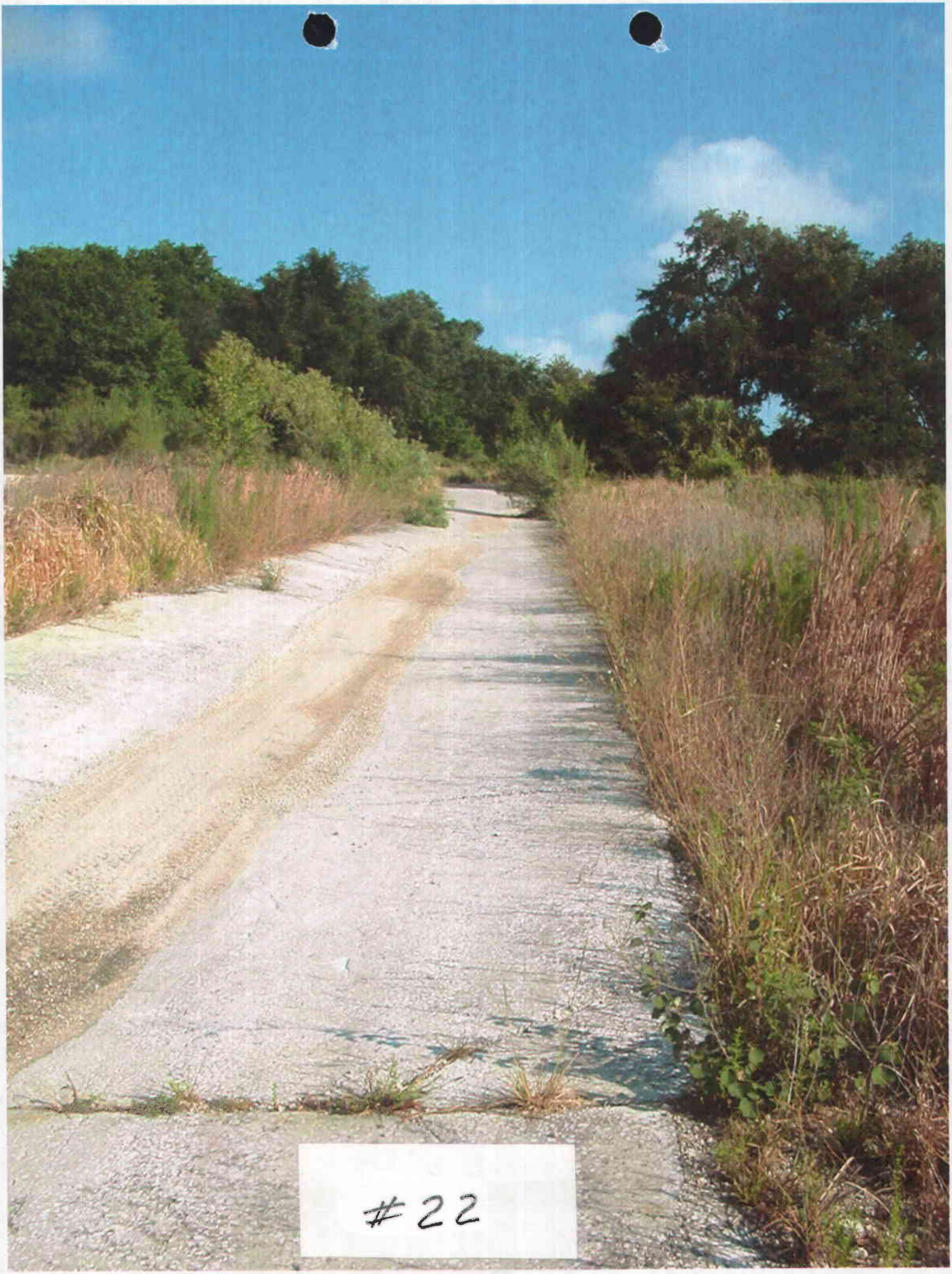
#20

#21


#22

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#33

HSI GEOTRANS
A TETRA TECH COMPANY

1080 Holcomb Bridge Road
Building 100, Suite 190
Roswell, Georgia
30076

770-642-1000 FAX 770-642-8808

June 28, 2000

Mr. Gilbert T. Dembeck
Florida Department of Environmental Protection
3804 Coconut Palm Drive
Tampa, FL 33619

Reference: Phase I Sampling Plan
UNC Recovery Corporation Facility, EPA ID FLD984166942

Dear Mr. Dembeck:

On behalf of UNC Recovery Corporation, enclosed please find the Phase I Sampling Plan for the above referenced facility. Field work is scheduled to begin Wednesday July 5, 2000. UNC Recovery Corporation will provide a document certification statement for this plan under separate cover

Please feel free to call Lisa Hamilton at (610) 992-7885 or me if you have any questions.

Sincerely,

Todd Hagemeyer

Todd Hagemeyer, P.G.
Project Manager
Associate

cc: Lisa Hamilton, GE
Kathy Gaynor, FDEP

P:\GE-MULB\DOCS\FDEP\FDEP18.wpd