CLARK
engineers-scientists

"Dedicated to helping businesses and government understand and meet their environmental obligations"

November 9, 1998

Ms. Elizabeth B. Knauss
Environmental Manager
Hazardous Waste Section
Division of Waste Management
Florida Department of Environmental Protection
Southwest District
3804 Coconut Palm Drive
Tampa, Florida 33619

Re: International Petroleum Corporation
105 South Alexander Street
Plant City, Florida 33566

Dear Ms. Knauss:

On behalf of our client, International Petroleum Corporation (IPC), the firm of Edward E. Clark Engineers-Scientists, Inc. (CLARK) is submitting a copy of the 1998 Waste Characterization Report. This report constitutes IPC's yearly chemical characterization of the sludge (sump and pump filter basket lint) for the purposes of disposal as non-hazardous waste.

Please contact me at (305) 233-1411 with any comments or questions you may have.

Yours truly,

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

EEC/bjk

cc: G. Allen, IPC

Project 9277.02

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Project 9277.02

WASTE CHARACTERIZATION PROGRAM

1998 REPORT

Yearly Sampling and Analysis for Sump Waste and Filter Basket Lint October 1998

Prepared For:

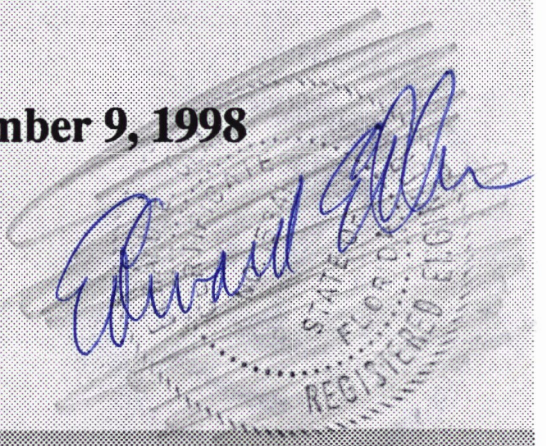
International Petroleum Corporation
105 South Alexander Street
Plant City, Florida 33599

Project 9277

Prepared By:

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

November 9, 1998



CLARK
engineers-scientists

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

1.0 INTRODUCTION

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

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

This report summarizes the sampling procedures used to collect the sludge samples and includes a discussion of the analytical results for the sample collected on October 6, 1998.

2.0 SLUDGE SAMPLING PROCEDURE

Samples from the accumulated waste material were collected by representatives of CLARK on October 6, 1998 in accordance with sampling procedures specified in CLARK'S approved Comprehensive Quality Assurance Plan (CompQAP # 870224). Aliquots of the combined sump and filter basket lint solids were collected from each accumulated drum and stored on-site during the sampling episode and placed in a pre-cleaned stainless steel mixing bowl. After sampling each drum, the composite waste sample was thoroughly mixed and then transferred into two (2) pre-cleaned 250 ml sample jars supplied by Precision Enivironmental Laboratory, Inc. (PRECISION) of Miramar, Florida. The two sample jars were stored in a shipping container with wet ice and transported to the laboratory for analysis.

PRECISION analyzed the TCLP leachate from the combined sample for volatile and extractable TCLP compounds by gas chromatography/mass spectrometry (GC/MS) using EPA Methods 8260 and 8270. TCLP metals were analyzed by either graphite furnace or cold vapor atomic absorption spectrophotometry, as appropriate. All analytical procedures were performed in accordance with PRECISION's FDEP approved Comprehensive Quality Assurance Plan (CompQAP # 920323).

3.0 DISCUSSION OF RESULTS

The TCLP leachate from the combined sump and filter basket composite sample collected on October 6, 1998 and reported on November 3, 1998 was analyzed for TCLP volatile and extractable compounds and metals. A review of the analytical data, for the combined solid sample, shows that the solid sample, reported as sludge, shows that the material is classified as non-hazardous, as defined by the TCLP criteria. All TCLP parameters were below laboratory detection limits (BDL) except for small concentrations of the following: barium, benzene, and cresols; all of which were well below maximum concentration for Toxicity Characteristic. The results of the 1998 sample are summarized in Table 1 along with the results from all previous sampling events. Copies of the laboratory's analytical results for the 1998 sampling event are enclosed in Appendix A.

TABLES

[redacted] Table [redacted] Summary of T[redacted] Analy[redacted]
June 1993 through October 1998

Compound	Concentration (mg/l)											
	Sampled 06/28/93	Sampled 07/27/93	Sampled 08/30/93	FDEP Split	Sampled 09/27/93	Sampled 10/28/93	Sampled 09/16/94	Sampled 11/20/95	Sampled 10/17/96	Sampled 11/5/97	Sampled 10/6/98	TCLP * Criteria
Arsenic	0.003	0.009	0.004	BDL	BDL	0.003	BDL	0.003	BDL	0.004	BDL	5.0
Barium	0.72	3.77	BDL	0.5	1.02	0.31	0.55	0.22	6.33	0.5	0.24	100
Cadmium	0.002	BDL	BDL	BDL	0.04	0.02	BDL	BDL	0.002	0.09	BDL	1.0
Chromium	0.003	0.30	BDL	BDL	0.04	0.04	BDL	BDL	BDL	BDL	BDL	5.0
Lead	0.071	0.14	0.09	BDL	0.14	0.15	0.20	0.14	0.025	0.16	BDL	5.0
Mercury	BDL	BDL	BDL	BDL	BDL	0.0002	0.001	0.0005	BDL	BDL	BDL	0.2
Selenium	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	1.0
Silver	BDL	BDL	BDL	BDL	BDL	BDL	0.09	BDL	BDL	BDL	BDL	5.0
Benzene	0.005	0.003	0.007	0.010	BDL	0.0011	BDL	0.00085	BDL	0.00063	0.0191	0.5
Carbon Tetrachloride	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	0.5
Chlorobenzene	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	100
Chloroform	BDL	BDL	BDL	BDL	BDL	0.008	BDL	BDL	BDL	BDL	BDL	6.0
1,2-Dichloroethane	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	0.5
1,1-Dichloroethylene	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	0.7
Hexachloroethane	BDL	BDL	BDL	NR	BDL	BDL	BDL	BDL	BDL	BDL	BDL	3.0
Methyl Ethyl Ketone	BDL	BDL	BDL	NR	BDL	0.034	BDL	0.00758	BDL	0.123	BDL	200
Tetrachloroethylene	0.002	0.002	0.005	0.007	0.003	BDL	BDL	0.00129	BDL	BDL	BDL	0.7
Trichloroethylene	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	0.5
Vinyl Chloride	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	0.2
o-Cresol	0.041	0.016	BDL	NR	BDL	0.001	BDL	0.00244	BDL	BDL	0.0116	200
m-Cresol	BDL	BDL	BDL	NR	BDL	BDL	BDL	BDL	BDL	BDL	0.0119	200
p-Cresol	0.018	0.004	BDL	NR	BDL	0.006	BDL	0.00135	BDL	BDL	0.0119	200
1,4-Dichlorobenzene	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	7.5
2,4-Dinitrotoluene	BDL	BDL	BDL	NR	BDL	BDL	BDL	BDL	BDL	BDL	BDL	0.13
Hexachlorobenzene	BDL	BDL	BDL	NR	BDL	BDL	BDL	BDL	BDL	BDL	BDL	0.13
Hexachlorbutadiene	BDL	BDL	BDL	NR	BDL	BDL	BDL	BDL	BDL	BDL	BDL	0.5
Nitrobenzene	BDL	BDL	BDL	NR	BDL	BDL	BDL	BDL	BDL	BDL	BDL	2.0
Pentachlorophenol	BDL	BDL	BDL	NR	BDL	0.042	BDL	BDL	BDL	BDL	BDL	100
Pyridine	BDL	BDL	BDL	NR	BDL	BDL	BDL	BDL	BDL	BDL	BDL	5.0
2,4,5-Trichlorophenol	BDL	BDL	BDL	NR	BDL	BDL	BDL	BDL	BDL	BDL	BDL	400
2,4,6-Trichlorophenol	BDL	BDL	BDL	NR	BDL	BDL	BDL	BDL	BDL	BDL	BDL	2.0

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

APPENDIX A

Submission Code: 98/10-337
Orders: 76169
Entered to lims: (AJ)

PRECISION ENVIRONMENTAL LABORATORY
CHAIN OF CUSTODY RECORD (DEP 62-770.900 (modified form))

10200 USA TODAY WAY, MIRAMAR, FLORIDA 33025
(954) 431-4550 • NATL WATS (800) LAB-8550 • FAX (954) 431-1959

Original - Return w/Report Yellow - Lab Copy Pink - Sampler Copy

FDEP Facility No.
Page ____ of ____
Sampling CompQAP NO.
Approval Date:

Report To: CLARK ENG-SCI, INC. (CES) Report To Address: 7270 NW 12TH St., Ste 140, MIAMI, 33126
Bill To: SAME Billing Address: " "
Project Number/Name: 9277 Site Location: PLANT CITY, FL
Project Contact: K BAUGHMAN Phone: 305 2331411 FAX: 305 591-1549
Alternate Contact: E. CLARK Phone: " FAX: "
Sampled By (print): KEN BAUGHMAN Sampler's Signature: K Baughman

ITEM	SAMPLE ID	DATE COLLECTED	TIME COLLECTED	pH FLD	TEMP °C FLD	COND FLD	MATRIX (DW SW GW SED S EFF HW BIO SA)	SAMPLE LOCATION/ JOB DESCRIPTION (optional if needed when samples are from different site locations)	# CONTAINERS	ANALYSIS REQUIRED: TCLP LESS HERBICIDES	Sample Condition as Received: Temp 14.9 °C; Sealed Yes (No) — Lot Number of Sampling Containers Used
1	~~FILTER BASKET~~ LINT	10/6/98	1250				S		2	X	7/28/98-UNP
2											TCLP metals
3											TCLP 8260
4											TCLP 8270
5											% Solids
6											
7											
8											
9											
10											

Special Comments: Total # of Containers:

QA/QC Report Needed?: Yes No (See price guide for applicable fees)
Report Format: Standard Other (specify)

(1) Relinquished by Signature: K Baughman	Date: 10/6/98	(2) Relinquished by Signature:	Date:	DUE DATE REQUESTED: Confirmation #
Company:	Time:	Company:	Time:	Coating Code: ____ Q / L / D
(1) Received by Signature: [illegible]	Date: 10/7/98	(2) Received by Signature:	Date:	Misc. Charges
Company:	Time: 10:00	Company:	Time:	SHADED AREAS ARE FOR LAB USE ONLY

PRECISION ENVIRONMENTAL LABORATORY, INC.

first in quality • first in service

EDCLAR000220
Mr. Ken Baughman
Ed Clark Engineers-Scientists
7270 NW 12th Street, #740
Miami, FL 33126

November 3, 1998
Submission # 9810000337
Order # 80076169
FDEP CompQAP# 920323
HRS Certification# E86349, 86413

Site Location/Project
Plant City, FL.
9277

Sample I.D.: Filter Basket Lint
Collected: 10/06/98 12:50
Received: 10/07/98 10:00
Collected by: Ken Baughman

PARAMETER	RESULT	UNITS	METHOD	DETECTION LIMIT	DATE EXT.	DATE ANALY.	ANALYST
Percent Solids	70.0	%	160.3(ASTM-D2216	0.01	10/07/98	10/07/98	LW/LJ
TCLP Extraction Procedure	FL#1		1311 Extraction		10/07/98	10/07/98	JS
6010B TCLP RCRA-6 Metals {No PB or Hg} by ICP			MEDF	1			
Arsenic, TCLP	BDL	mg/L	3050/6010B	0.010	10/07/98	10/09/98	CDP
Barium, TCLP	0.24	mg/L	3050/6010B	0.100	10/07/98	10/09/98	CDP
Cadmium, TCLP	BDL	mg/L	3050/6010B	0.100	10/07/98	10/09/98	CDP
Chromium, TCLP	BDL	mg/L	3050/6010B	0.100	10/07/98	10/09/98	CDP
Selenium, TCLP	BDL	mg/L	3050/6010B	0.010	10/07/98	10/09/98	CDP
Silver, TCLP	BDL	mg/L	3050/6010B	0.100	10/07/98	10/09/98	CDP
Lead, TCLP	BDL	mg/L	1311/7421	0.005	10/08/98	10/10/98	RAP
Mercury, TCLP (Cold Vapor AA)	BDL	mg/L	1311/7470A	0.0002	10/07/98	10/09/98	CDP
8260.B TCLP: Volatile Organics by GC-MS			MEDF	10			
Vinyl Chloride	BDL	ug/L	1311/8260B	10.000	10/10/98	10/11/98	PMD
Methyl Ethyl Ketone	BDL	ug/L	1311/8260B	100.000	10/10/98	10/11/98	PMD
1,1-Dichloroethene	BDL	ug/L	1311/8260B	10.000	10/10/98	10/11/98	PMD
Chloroform	BDL	ug/L	1311/8260B	10.000	10/10/98	10/11/98	PMD
Carbon Tetrachloride	BDL	ug/L	1311/8260B	10.000	10/10/98	10/11/98	PMD
Benzene	19.1	ug/L	1311/8260B	10.000	10/10/98	10/11/98	PMD

EDCLAR000220
Mr. Ken Baughman
Ed Clark Engineers-Scientists
7270 NW 12th Street, #740
Miami, FL 33126

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Collected by: Ken Baughman

PARAMETER	RESULT	UNITS	METHOD	DETECTION LIMIT	DATE EXT.	DATE ANALY.	ANALYST
Cresol	35.3	ug/L	1311/8270C	10.0	10/09/98	10/12/98	MEC
Pyridine	BDL	ug/L	1311/8270C	10.0	10/09/98	10/12/98	MEC

BDL: Indicates Analyte is Below Detection LimitMEDF: Matrix Effected Dilution Factor***
Work Subcontracted to Outside Labs Denoted by HRS Cert ID in Analyst Field
Qualifier following result conforms to FAC 62-160 Table 7***Unless otherwise noted, mg/Kg denotes wet weight***
***62-770: If the MDL using the most sensitive and currently available technology is higher than a specific criterion, the PQL shall be used.
Certs:Al.=#41180, Ct.=#PH0217, Ks.=#E270 + E1245, Ky.=#90087, La.=#9601, Md.=#271, Ma.=#M-FL535
NC.=#539, ND.=#R163, OK.=#9523, SC.=#96023, Tn.=#TN02826

Michael A. Spitzer, Laboratory Director

WATKINS, TOMASELLO
& CALEEN, P.A.
ATTORNEYS AND COUNSELORS AT LAW

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DEBORAH A. LACOMBE
THOMAS G. TOMASELLO
W. DAVID WATKINS

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TALLAHASSEE, FLORIDA 32308
(850) 671-2644 FAX (850) 671-2732
E-MAIL: WTC-PA@WTC-PA.COM

MAILING ADDRESS
POST OFFICE BOX 15828
TALLAHASSEE, FLORIDA 32317-5828

July 1, 1998

VIA FACSIMILE AND US MAIL

Richard D. Garrity, PhD
Director of District Management
Southwest District
Department of Environmental Protection
3804 Coconut Palm Drive
Tampa, Florida 33619

Re: Warning Letter 187521, International Petroleum Corporation, EPA ID # FLD 065680613, Hillsborough County; your letter of June 25, 1998 to Garry Allen.

Dear Dr. Garrity:

International Petroleum Corporation, a used oil re-refinery in Plant City — has asked us to advise and assist in resolving the issues raised in your letter of June 25, 1998, particularly the appropriate amount of any penalty to be paid. As soon as we complete our review (within the next ten days) we will be able to address the Department's request for payment of a $54,150.00 penalty. If acceptable to you, I will call Jim Dregne by mid-July to see if there is a way to resolve this without litigation.

Thank you.

Sincerely,

R. L. Caleen, Jr.

cc: Jim Dregne, FDEP
Garry Allen, President, IPC

1039:RLC:lp

Waste Mgt.
Jim Dregne -

Jim Rick has not
seen - he is on
Leave —
Mac

WATKINS, TOMASELLO & CALEEN, P.A.
ATTORNEYS AND COUNSELORS AT LAW

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FACSIMILE

To: Richard Garrity / Jim Dregne

Fax No.: 813-744-6084 | 813-744-6100

From: R.L. Caleen

Message: See Attached

TOTAL NO. OF PAGES: 2 (INCLUDING THIS COVER SHEET)
ORIGINAL TO FOLLOW U.S. MAIL: NO ____ YES ✓
CLIENT NUMBER: 1039 DATE: 7/1/98

Waste

WATKINS, TOMASELLO
& CALEEN, P.A.
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To: Richard Garrity / Jim Dreggne

Fax No.: 813-744-6084 | 813-744-6125

From: R.L. Caleen

Message: See Attached

TOTAL NO. OF PAGES: 2 (INCLUDING THIS COVER SHEET)
ORIGINAL TO FOLLOW U.S. MAIL: NO ____ YES ✓
CLIENT NUMBER: 1039 DATE: 7/1/98

PENALTY COMPUTATION WORKSHEET

Facility Name: **INTERNATIONAL PETROLEUM CORPORATION**

Facility Address: 105 South Alexander Street, Plant City, Florida, 33566

Penalty Computed By: James Dregne

Date: ~~November 18, 1997~~ June 23, 1998

PART I - Class B (no penalty) Determination

Rationale: n/a

PART II - Class A Penalty Determination

	Violation Type	Potential for Harm	Extent of Deviation	Matrix Amount	Multi-Day	Adjustment	Total
1	40 CFR 262.11	major	major	$25,000			$25,000
2	40 CFR 263.20	moderate	moderate	$6,500	$5,000		$11,500
3	40 CFR 279.22(c)	minor	minor	$150			$150
4	~~40 CFR 279.54(c)(2)~~	~~major~~	~~moderate~~	~~$7,000~~			~~$7,000~~ DELETED
5	403.727(3)(b)	moderate	major	$9,500	$8,000		$17,500

Total Penalties for All Violations: ~~$61,150.00~~ $54,150.00

Florida Department of

Memorandum **Environmental Protection**

ENFORCEMENT/COMPLIANCE COVER MEMO

TO: ☐ Richard Garrity, Ph.D., Director of District Management
☒ William Kutash, Environmental Administrator
☐ Office of General Counsel, ATTN:_____

FROM/THROUGH: William Kutash, Environmental Administrator
SCT Stanley Tam, Professional Engineer II
Elizabeth Knauss, Environmental Manager
Jim Dregne, Environmental Specialist II

DATE: June 23, 1998

FILE NAME: **INTERNATIONAL PETROLEUM CORPORATION** PROJECT #:187521

PROGRAM: Hazardous Waste COUNTY: Hillsborough

TYPE OF DOCUMENT:

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

DESCRIPTION OF VIOLATIONS: IPC generates, transports, markets and processes used oil and generates and transports used oil filters. IPC also handled used antifreeze from some of its clients. Some of the antifreeze was determined to be a hazardous waste, but was transported, stored and treated by IPC. The company did not notify the state of these hazardous waste activities. The storage tank used to store the hazardous waste antifreeze was not certified to store hazardous waste. The company also generated solid waste that did not have a waste determination. The handling of solid waste without a waste determination was a recurring violation.

SUMMARY OF CORRECTIVE ACTIONS: The facility must comply with hazardous waste rules and enter into a consent order and pay a penalty. The secondary containment requirement for rail cars was deleted per State guidance. Penalty Authorization in this case has been approved.

PENALTY SUMMARY:

Potential for Harm: Major Extent of Deviation: Major

Penalty Amount: $54,150.00 Expenses: $100.00

TOTAL PENALTY AMOUNT: $54,250.00 ☐ TO SECRETARY

SENDER:
- Complete items 1 and/or 2 for additional services.
- Complete items 3, 4a, and 4b.
- Print your name and address on the reverse of this form so that we can return this card to you.
- Attach this form to the front of the mailpiece, or on the back if space does not permit.
- Write *"Return Receipt Requested"* on the mailpiece below the article number.
- The Return Receipt will show to whom the article was delivered and the date delivered.

I also wish to receive the following services (for an extra fee):
1. ☐ Addressee's Address
2. ☐ Restricted Delivery

Consult postmaster for fee.

3. Article Addressed to:
Mr. Darryl Allen
International Petroleum
105 S. Alexander St
Plant City, FL
33566

4a. Article Number
P 115 391 708

4b. Service Type
☐ Registered ☒ Certified
☐ Express Mail ☐ Insured
☒ Return Receipt for Merchandise ☐ COD

7. Date of Delivery
6-26

5. Received By: *(Print Name)*

6. Signature: *(Addressee or Agent)*
X

8. Addressee's Address *(Only if requested and fee is paid)*

Is your RETURN ADDRESS completed on the reverse side?

Thank you for using Return Receipt Service.

PS Form **3811**, December 1994 102595-97-B-0179 **Domestic Return Receipt**

P 115 391 708

US Postal Service
Receipt for Certified Mail
No Insurance Coverage Provided.
Do not use for International Mail *(See reverse)*

Sent to Darryl Allen Intl Petroleum	
Street & Number 105 S. Alexander St	
Post Office, State, & ZIP Code Plant City, FL 33566	
Postage	$
Certified Fee	
Special Delivery Fee	
Restricted Delivery Fee	
Return Receipt Showing to Whom & Date Delivered	
Return Receipt Showing to Whom, Date, & Addressee's Address	
TOTAL Postage & Fees	$
Postmark or Date 6-25-98	

PS Form **3800**, April 1995

Department of Environmental Protection

Southwest District
3804 Coconut Palm Drive
Tampa, Florida 33619

Lawton Chiles
Governor

Virginia B. Wetherell
Secretary

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

International Petroleum Corporation
105 South Alexander Street
Plant City, Fl 33566

June 25, 1998

ATTN: Garry Allen

RE: Warning Letter 187521
International Petroleum Corporation
EPA ID # FLD 065680613
Hillsborough County

Dear Mr. Allen:

The Department has completed its review of the information you provided during the meeting that was conducted on March 4, 1998. No information was presented at the meeting that would justify any changes in either the category of the violations or the dollar amounts assessed. However, the Department did make an adjustment to the proposed RCRA Civil Penalty Assessment (see Attachment 1) as a result of the deletion of the rail car secondary containment violation. The adjusted penalty amount that would be assessed in this case is $54,150.00 and Department cost and expenses of $100.00.

On June 18, 1998, the Department's Division of Waste Management in Tallahassee issue guidance concerning the EPA requirement for adequate secondary containment systems for rail cars containing used oil. The guidance letter said that "EPA has acknowledged that rail cars and barges were not considered when the used oil management standards were written and they did not intend for these regulations to apply to rail cars and barges transporting used oil or storing used oil for less than 35 days". EPA has been asked to clarify this issue through guidance or a revision to the regulations. Until clarification is issued, DEP will accept, as secondary containment, spill pans placed beneath rail cars, centered under the dome or loading ports. I have attached a copy of the Department's guidance letter for your information and necessary action.

The Department is willing to address an amicable resolution to this case. If you would like to schedule a meeting to further discuss this case or have any questions, please contact Jim Dregne at (813) 744-6100 ext. 410. If the Department does not hear from you within 14 days of receipt of this letter, we will assume you are not interested in settling this matter, and will proceed accordingly.

Sincerely,

for Richard D. Garrity, Ph.D.
Director of District Management
Southwest District

RDG/jd
2 Attachment as

PENALTY COMPUTATION WORKSHEET

Facility Name: **INTERNATIONAL PETROLEUM CORPORATION**

Facility Address: 105 South Alexander Street, Plant City, Florida, 33566

Penalty Computed By: James Dregne

Date: ~~November 18, 1997~~ June 23, 1998

PART I - Class B (no penalty) Determination

Rationale: n/a

PART II - Class A Penalty Determination

	Violation Type	Potential for Harm	Extent of Deviation	Matrix Amount	Multi-Day	Adjustment	Total
1	40 CFR 262.11	major	major	$25,000			$25,000
2	40 CFR 263.20	moderate	moderate	$6,500	$5,000		$11,500
3	40 CFR 279.22(c)	minor	minor	$150			$150
4	~~40 CFR 279.54(c)(2)~~	~~major~~	~~moderate~~	~~$7,000~~			~~$7,000~~ DELETED
5	403.727(3)(b)	moderate	major	$9,500	$8,000		$17,500

Total Penalties for All Violations: ~~$61,150.00~~ $ 54,150.00

Florida Department of

Memorandum

Environmental Protection

TO: Directors of District Management
District Waste Program Administrators

FROM: John M. Ruddell, Director
Division of Waste Management

DATE: June 18, 1998

SUBJECT: Used Oil Transfer Facilities Utilizing Rail Cars and Barges

Chapter 62-710, F.A.C., adopted EPA's used oil management standards in 40 CFR Part 279. Paragraph 279.45(d) (under Subpart E) states that "containers used to store used oil at transfer facilities must be equipped with a secondary containment system." A "container" is defined in Subsection 279.1 as "any portable device in which a material is stored, transported, treated, disposed of, or otherwise handled." An issue has come up as to the logistics of requiring secondary containment under rail cars or "around" barges (non double-hull construction). The existing interpretations of the used oil management standards do not take into account the unique nature of temporarily storing, bulking, and shipping used oil in rail cars or barges or the additional precautions that are employed by the DOT and the Coast Guard regulations when so doing.

The management standards also allow the use of "equivalent secondary containment systems" as defined at 40 CFR 279.45(d)(1)(iii), but fail to define what this might include. The EPA has acknowledged that rail cars and barges were not considered when the used oil management standards were written and that they did not intend for these regulations to apply to rail cars and barges transporting used oil or storing used oil for less than 35 days. The EPA has been asked to clarify this issue through guidance or a revision to the regulations.

Until the EPA clarifies this issue or explains what an "equivalent secondary containment system" is, it is not appropriate to take formal enforcement

against facilities lacking complete secondary containment under rail cars or around barges collecting used oil. Until clarification is issued, DEP will accept, as secondary containment, spill pans placed beneath the rail car, centered under the dome or loading port, and spill pans or other spill control devices or equipment placed under valves and couplings on barges, when used oil is being transferred.

When inspecting facilities that utilize rail cars, it is appropriate to review their Spill Prevention, Control, and Countermeasures (SPCC) Plans or preparedness and prevention plans and ask the operators what safety precautions they take or Best Management Practices (BMPs) they use when used oil is loaded into or unloaded from rail cars or barges. Recommended precautions or BMPs include the following:

- The rail car or barge has a current DOT or Coast Guard certification/documentation that shows it has successfully passed the required inspections and is operating within its inspection interval (i.e., 49 CFR 180, Continuing Qualification and Maintenance of Packaging).
- Training has been provided (and documented) on loading and unloading procedures.
- The level of the rail car or barge contents are checked before loading to calculate the available capacity, always allowing adequate head space for expansion.
- For rail cars, the rail and ballast area are protected from used oil overfills by spill pans placed beneath the rail car, centered under the dome or loading port.
- The rail car or barge is always inspected for leaks, equipment problems, and unintentional releases prior to each loading and prior to shipment, but at a minimum of at least every 72 hours.
- An attendant is always present during loading/unloading operations.
- Used oil is top loaded when possible to minimize the possibility of a release during loading. Bottom valves should not be used during

loading operations since they may become obstructed, allowing for potential releases.

- When top loading, the hose is tied/secured to the opening and the lid/port is closed if possible on the hose for extra security.
- When loading or unloading from bottom or side valves, the hose-to-valve connections are checked and drip pans are placed under the connections.
- All pumping equipment is shut off before disconnecting transfer hoses.
- Spill response equipment is present on site during transfer operations (allowing it to be on the truck or kept on site).
- Rail cars and barges are protected to minimize the possibility of vandalism-caused releases by either fencing or cable seals on valves when the units are not attended.

This guidance is subject to change when the EPA makes a determination on the applicability of secondary containment for used oil transfer facilities utilizing rail cars or barges. Until that time, these BMPs should be considered when conducting inspections of used oil transfer facilities and reviewing permit applications for used oil processing facilities receiving used oil by rail cars or barges.

Note: if a used oil processor utilizes rail cars or barges for the actual processing of used oil, the Department will not issue a permit authorizing such processing unless full secondary containment is provided.

JMR/rcc

INTEROFFICE MEMORANDUM

Sensitivity: COMPANY CONFIDENTIAL

Date: 28-May-1998 04:16pm
From: Maria Raney TPA
RANEY_M
Dept: Southwest District Office
Tel No: 813/744-6100 Ext. 373

Subject: International Petroleum Corp.

Jim,

I just received a call from Heidi Swanson of Hills. Co. EPC. She works in the air program. She told me she had just performed an inspection of the Tampa Tribune and was told by their consultant that the blanket wash solvent from cleaning their presses is picked up by EPC for recycling. I told her you would be very interested in this and to contact you. I did not know your new extension. I asked her if they had any receipts or documentation showing they were pciking this stuff up but she did not ask for them. Thought you would like this. Her # is 272-5530

Maria

STATE OF FLORIDA
DEPARTMENT OF ENVIRONMENTAL PROTECTION
SOUTHWEST DISTRICT

CONVERSATION RECORD

Date MAY 7, 1998 Subject IPC TANK BOTTOMS

Time 1800 hours Permit No. —

County Hillsborough County

Mr. Allen Plaza Telephone No. (818) 551-2934/2922

Representing Dept. of Toxic Control, State of Cal.if (secretary = Carol)

[ ] Phoned Me [X] Was Called [ ] Scheduled Meeting [ ] Unscheduled Meeting

Other Individuals Involved in Conversation/Meeting

Summary of Conversation/Meeting

- CALIFORNIA DOES NOT USE EPA Method 846 - 1311 TCLP to test tank bottoms, they use a wet extraction method. Analysis and standard is based on this method.

- According to Mr. PLAZA, the California standards are more stringent. Tank bottoms generated from used oil storage tanks are managed as a HAZARDOUS waste, but not a RCRA hAzardous waste. It is cheaper for the generator because he does not have to pay a federal tax.

- He has never done a study on used oil tank bottoms but is confidant that the used oil tank bottoms would be hAzardous because of the presence of organics.

(continue on another sheet, if necessary)

Signature

Title ES II

PA-01
1/96
pap

Department of Environmental Protection

Lawton Chiles
Governor

Southwest District
3804 Coconut Palm Drive
Tampa, Florida 33619

Virginia B. Wetherell
Secretary

International Petroleum Corporation
105 South Alexander Street
Plant City, Fl 33566

March 23, 1998

ATTN: Garry Allen

RE: Information Requests

Dear Mr. Allen:

The Department is currently reviewing records involving used anti-freeze collected by International Petroleum Corporation. Request you provide the Department with copies of the computer generated reports of anti-freeze pick-ups for the below listed facilities between 1995 and 1998:

1. Jiffy Lube - 1513 Fowler Avenue, Tampa
2. Jiffy Lube - 1316 Gandy Blvd, Tampa
3. Jiffy Lube - 8303 Dale Mabry Highway, Tampa
4. Ringhaver Equipment Company - 415 Grassland, Palm Bay
5. Ringhaver Equipment Company - 14300 Ponce DeLeon, Brooksville
6. Ringhaver Equipment Company - 9797 Gibsonton, Riverview

Request that the requested documents be FAX to the Department. Our FAX # is (813) 744-6125. If you have any questions, please contact me at (813) 744-6100 ext. 379.

Sincerely,

James M. Dregne
Environmental Specialist II
Division of Waste Management

JD/jd

FDEP	3804 Coconut Palm Drive, Tampa, FL 33619-8318

FAX

Date: MARCH 23, 1998

Number of pages including cover sheet: 2

To:
GARRY ALLEN
INTERNATIONAL Petroleum Corp.

Phone:

Fax phone: (813) 754-3789

CC:

From:
Jim Dregne
FDEP

Phone: (813) 744-6100 X379

Fax phone: (813) 744-6125

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

Per your request. ATTACHED written request for info on Anti-freeze.

Jim

Transmit Confirmation Report

No.	:	003
Receiver	:	97543789
Transmitter	:	WASTE MGT TAMPA SWDIST
Date	:	Mar 23 98 16:47
Time	:	01'16
Mode	:	Norm
Pages	:	02
Result	:	OK

MALATINO & ASSOCIATES, INC.

March 13, 1998

To: Mr. Garry R. Allen

From: Tony Malatino (Tony)

Subject: FDEP telephone request 3-12-98 by Mr. Jim Dregne, Hazardous Waste Section

On March 12, 1998 at approximately 1:30 PM Mr. Jim Dregne of the Hazardous Waste Section of FDEP (Tampa district office) called me for two (data/letters) supplemental items to be faxed/mailed to him as soon as possible:

1- A copy of the 1994 and/or 1995 analysis from Spectrum laboratory showing the full TCLP analysis of the I.P.C. filter lint/sump solids (attached 9-19-94 Spectrum data).
2- A copy of the letter memorandum from Jiffy Lube (1995 or 1996) in reference to antifreeze (Where they state they do not have to sample every site).

RECEIVED
MAR 16 1998
Department of Environmental Protection
BY SOUTHWEST DISTRICT

Jiffy Lube International, Inc. • P.O. Box 2967 • Houston, Texas 77252-2967 • Phone (713) 546-4100 • Fax (713) 546-4154

April 11, 1995

Mr. Frank Shibetti
International Petroleum Corporation
105 South Alexander Street
Plant City, Florida 33566

Certified Mail
Z 769 963 607
Return Receipt Requested

SUBJECT: Jiffy Lube Internationa
Used Antifreeze Classi

Dear Mr. Shibetti:

This letter is being sent as a follow-up to your discussion with Mr. Brett Morton of Pennzoil Company regarding the sampling requirements for used antifreeze picked up for recycling/disposal by International Petroleum Corporation (IPC) at quick lube facilities in Florida. I am writing to address this situation specific to Jiffy Lube International, Inc. (JLI) locations.

JLI has reviewed existing federal and state regulations for characterizing used antifreeze relative to whether or not it is a hazardous waste. Based on this review, JLI plans on performing the following sampling protocol to demonstrate that the used antifreeze generated at our stores in Florida is not a hazardous waste:

1. A representative sample of used antifreeze will be collected at four facilities in Florida within the next month. As JLI currently has 32 facilities in Florida, this will result in the collection of samples at approximately 12 - 13% of our sites. Results of these samples will be considered representative of used antifreeze generated at the other locations; i.e., JLI will use generator knowledge at the remaining 28 facilities.
2. Samples will be sent to a state-certified laboratory and analyzed for TCLP levels of lead, benzene, perchloroethylene and trichloroethylene.
3. JLI will review results to insure that TCLP thresholds are not exceeded and will maintain these results in the office of the regional manager, Jeff Jones, in Florida as well as the JLI corporate offices in Houston, Texas. JLI will provide your firm with a copy of these results when they are received. These sampling results will also be kept on file to provide to agencies as requested.
4. We are also requesting that you provide Mr. Jones with copies of the results of the used antifreeze tests IPC has conducted at the various JLI locations in Florida over the past 2 years.

With the data collected above, JLI believes that we can confidently continue to handle our used antifreeze as a non-hazardous waste. No further sampling will be conducted unless generation practices for this material change which could affect its ability to pass the TCLP testing criteria.

Based on your conversation with Mr. Morton, it is our understanding that IPC will consider this type of testing to be acceptable for continuing to manage up JLI's used antifreeze as a non-hazardous waste. Any additional testing of used antifreeze will be not paid for by JLI.

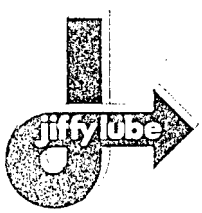
Thank you for your cooperation in this matter. If you have any questions concerning this letter, please call me at (713) 546-6923 or Mr. Walid Samarneh at (713) 546-6847.

Sincerely,

Brenda L. Clark

Brenda L. Clark
Environmental Coordinator

BLC:blc



Jiffy Lube International, Inc. • P.O. Box 2967 • Houston, Texas 77252-2967 • Phone (713) 546-4100 • Fax (713) 546-4154

August 18, 1995

Mr. Frank Shibetti
International Petroleum Corporation
105 South Alexander Street
Plant City, Florida 33566

SUBJECT: Jiffy Lube International, Inc.
Used Antifreeze Classification/Sampling

Dear Mr. Shibetti:

This letter is being sent as a follow-up to my earlier letter dated April 11, 1995. This letter discussed the sampling procedures Jiffy Lube International, Inc. (JLI) would be following to prove that used antifreeze generated at our quick lube locations could be handled as a non-hazardous waste. It had been agreed that IPC would consider this type of testing to be acceptable for continuing to manage JLI's used antifreeze as a non-hazardous waste.

Results of the used antifreeze analytical tests are enclosed for your review. Based on these results, the used antifreeze can be characterized as a non-hazardous waste. The sampling indicated the following results for the test parameters required by the State of Florida:

- TCLP lead - all samples were below the analytical detection limit of 1 mg/l
- TCLP benzene - all samples were below the analytical detection limit of 100 ug/l
- TCLP tetrachloroethylene - all samples were below the analytical detection limit of 100 ug/l
- TCLP trichloroethylene - all samples were below the analytical detection limit of 100 ug/l

These samples were collected consist with the sampling protocol outlined in my April 11 letter, with the exception that all samples were not collected within one month of the letter. With this data, JLI believes that we can confidently continue to handle our used antifreeze as a non-hazardous waste. No further sampling will be conducted unless generation practices for this material change which could affect its ability to pass the TCLP testing criteria. Any additional testing of used antifreeze will be not paid for by JLI.

Thank you for your cooperation in this matter. If you have any questions concerning this letter, please call Mr. Walid Samarneh at (713) 546-6847 who is now coordinating environmental compliance issues for JLI.

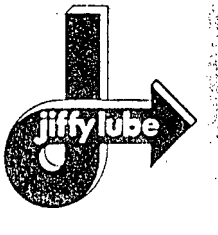
Sincerely,

Brenda L. Clark

Brenda L. Clark
Environmental Coordinator

BLC:blc

Attachments



Inchcape Testing Services
Aquatec Laboratories

Laboratory Locations
55 South Park Drive
Colchester, VT 05446

75 Green Mountain Drive
South Burlington, VT 05403

150 Herman Melville Boulevard
New Bedford, MA 02740

Analytical Report

Pennzoil Co./Jiffy Lube
ESHA - 12th Floor
700 Milam
Houston, TX 77001

Attention : Walid Samarneh

CC Results to : Ken Oja

Job:10048

Date : 06/13/95
ETR Number : 51384
Project No.: 95208
No. Samples: 38
Arrived : 05/23/95
P.O. Number: *

Standard analyses were performed in accordance with Methods for Analysis of Water and Wastes, EPA-600/4/79-020, Test Methods for Evaluating Solid Waste, SW-846, or Standard Methods for the Examination of Water and Wastewater.
All results are in mg/l unless otherwise noted.

Lab No./ Method No.	Sample Description/ Parameter	Result
257338	Spent absorbent 63:(TCLPExt)	
6010	Selenium, Total	<0.5
6010	Silver, Total	<1
257338MS	Spent absorbent 63MS:[MS](TCLPExt)	
6010	Arsenic, Total	113.0%
6010	Barium, Total	113.1%
6010	Cadmium, Total	120.3%
6010	Chromium, Total	132.4%
6010	Lead, Total	121.1%
6010	Selenium, Total	119.6%
6010	Silver, Total	127.6%
257340	Absorbent 228:(TCLPExt)	
6010	Arsenic, Total	<1
6010	Barium, Total	<10
6010	Cadmium, Total	<0.1
6010	Chromium, Total	<1
6010	Lead, Total	<1
7470	Mercury, Total	<0.04
6010	Selenium, Total	<0.1
6010	Silver, Total	<1
257342	Used Anti-Freeze 63:(TCLPExt)	
6010	Lead, Total	<1
257346	Used Anti-Freeze 228:(TCLPExt)	
6010	Lead, Total	<1

< Cont. Next Page >

Inchcape Testing Services
Aquatec Laboratories

Laboratory Locations
55 South Park Drive
Colchester, VT 05446

75 Green Mountain Drive
South Burlington, VT 05403

150 Herman Melville Boulevard
New Bedford, MA 02740

Analytical Report

Date: 13 June 1995
Aquatec Lab No.: 257343
ETR No.: 51384; Project No.: 95208
Sample Received On: 23 May 1995; Analyzed On: 03 June 1995
Sample Identification: Pennzoil Company/Jiffy Lube, TCLP extract (on 05/25/95) of a sample labeled Used Antifreeze 63.

Volatile Organic Compounds in ug/l
EPA Method 601 and 602

benzene	100 U
tetrachloroethene	100 U
trichloroethene	100 U

Summary of Surrogate Recoveries

	% Rec
fluorobenzsene	164
1-chloro-2-fluorobenzene	153
1-bromo-3-chloropropane	165

Note: The high surrogate recoveries were confirmed, by reanalysis, to be matrix related.

Key to the letters used to qualify the results of the analysis:

U - The compound was analyzed for but not detected at or above the reporting limit. The number is the method reporting limit for the compound.

Inchcape Testing Services
Aquatec Laboratories

Laboratory Locations
55 South Park Drive
Colchester, VT 05446

75 Green Mountain Drive
South Burlington, VT 05403

150 Herman Melville Boulevard
New Bedford, MA 02740

Analytical Report

Date: 13 June 1995
Aquatec Lab No.: 257734
ETR No.: 51384; Project No.: 95208
Sample Received On: 23 May 1995; Analyzed On: 02 June 1995
Sample Identification: Pennzoil Company/Jiffy Lube, TCLP extract (on 05/25/95) of a sample labeled Used Antifreeze 228.

Volatile Organic Compounds in ug/l
EPA Method 601 and 602

benzene	100 U
tetrachloroethene	100 U
trichloroethene	100 U

Summary of Surrogate Recoveries

	% Rec
fluorobenzsene	101
1-chloro-2-fluorobenzene	98
1-bromo-3-chloropropane	89

Key to the letters used to qualify the results of the analysis:

U - The compound was analyzed for but not detected at or above the reporting limit. The number is the method reporting limit for the compound.

Inchcape Testing Services
Aquatec Laboratories

Laboratory Locations
55 South Park Drive
Colchester, VT 05446

75 Green Mountain Drive
South Burlington, VT 05403

150 Herman Melville Boulevard
New Bedford, MA 02740

Analytical Report

Pennzoil Co./Jiffy Lube
ESHA - 12th Floor
700 Milam
Houston, TX 77001

Attention : Walid Samarneh

Date : 08/11/95
ETR Number : 52678
Project No.: 95208
No. Samples: 39
Arrived : 07/28/95
P.O. Number: *

CC Results to : Ken Oja

Job:Waste Stream Characterization

Standard analyses were performed in accordance with Methods for Analysis of Water and Wastes, EPA-600/4/79-020, Test Methods for Evaluating Solid Waste, SW-846, or Standard Methods for the Examination of Water and Wastewater.
All results are in mg/l unless otherwise noted.

Lab No./ Method No.	Sample Description/ Parameter	Result
265045	Trip Blank:07/24/95 (Liquid)	
6010	Thallium, Total	<0.01
6010	Zinc, Total	<0.02
9040	pH (std. units)	7.87
265046	Trip Blank:(TCLPExt)	
6010	Arsenic, Total	<1
6010	Barium, Total	<10
6010	Cadmium, Total	<0.1
6010	Chromium, Total	<1
6010	Lead, Total	<1
7470	Mercury, Total	<0.04
6010	Selenium, Total	<0.1
6010	Silver, Total	<1
265049	Used Anti-freeze 149:(TCLPExt)	
6010	Lead, Total	<1
265052	Used Anti-freeze 255:(TCLPExt)	
6010	Lead, Total	<1
265055	Used Anti-freeze Dup:(TCLPExt)	
6010	Lead, Total	<1
265058	Used Filter 149:(TCLPExt)	
6010	Arsenic, Total	<1
6010	Barium, Total	<10
6010	Cadmium, Total	<0.1
6010	Chromium, Total	<1
6010	Lead, Total	<1

< Cont. Next Page >

Inchcape Testing Services
Aquatec Laboratories

Laboratory Locations
55 South Park Drive
Colchester, VT 05446

75 Green Mountain Drive
South Burlington, VT 05403

150 Herman Melville Boulevard
New Bedford, MA 02740

Analytical Report

Date: 09 August 1995
Aquatec Lab No.: 265053
ETR No.: 52678; Project No.: 95208; Job: Waste Stream Characterization
Sample Received On: 28 July 1995; Analyzed On: 06 August 1995
Sample Identification: Pennzoil Co./Jiffy Lube, TCLP extract of Aquatec Lab No. 265051 labeled Used Anti-freeze 255, 07/27/95.

Volatile Organic Compounds in ug/l
EPA Method 601 and 602

benzene	10 U
tetrachloroethene	10 U
trichloroethene	10 U

The extract was diluted 20 fold for analysis.

Summary of Surrogate Recoveries

	% Rec
fluorobenzene	85
1-chlor-2-fluorobenzene	79

Key to the letter used to qualify the results of the analysis:

U - The compound was analyzed for but not detected at or above the reporting limit. The number is the method specified reporting limit for the compound.

Inchcape Testing Services
Aquatec Laboratories

Laboratory Locations
55 South Park Drive
Colchester, VT 05446

75 Green Mountain Drive
South Burlington, VT 05403

150 Herman Melville Boulevard
New Bedford, MA 02740

Analytical Report

Date: 09 August 1995
Aquatec Lab No.: 265050
ETR No.: 52678; Project No.: 95208; Job: Waste Stream Characterization
Sample Received On: 28 July 1995; Analyzed On: 06 August 1995
Sample Identification: Pennzoil Co./Jiffy Lube, TCLP extract of Aquatec Lab No. 265048 labeled Used Anti-freeze 149, 07/27/95.

Volatile Organic Compounds in ug/l
EPA Method 601 and 602

benzene	10 U
tetrachloroethene	10 U
trichloroethene	10 U

The extract was diluted 20 fold for analysis.

Summary of Surrogate Recoveries

	% Rec
fluorobenzene	82
1-chlor-2-fluorobenzene	79

Key to the letter used to qualify the results of the analysis:

U - The compound was analyzed for but not detected at or above the reporting limit. The number is the method specified reporting limit for the compound.

Inchcape Testing Services
Aquatec Laboratories

Laboratory Locations
55 South Park Drive
Colchester, VT 05446

75 Green Mountain Drive
South Burlington, VT 05403

150 Herman Melville Boulevard
New Bedford, MA 02740

Analytical Report

Date: 09 August 1995
Aquatec Lab No.: 265056
ETR No.: 52678; Project No.: 95208; Job: Waste Stream Characterization
Sample Received On: 28 July 1995; Analyzed On: 06 August 1995
Sample Identification: Pennzoil Co./Jiffy Lube, TCLP extract of Aquatec Lab No. 265054 labeled Used Anti-Freeze Dup, 07/27/95.

Volatile Organic Compounds in ug/l
EPA Method 601 and 602

benzene	10 U
tetrachloroethene	10 U
trichloroethene	10 U

The extract was diluted 20 fold for analysis.

Summary of Surrogate Recoveries

	% Rec
fluorobenzene	79
1-chlor-2-fluorobenzene	79

Key to the letter used to qualify the results of the analysis:

U - The compound was analyzed for but not detected at or above the reporting limit. The number is the method specified reporting limit for the compound.

SPECTRUM
Laboratories, Inc. FORT LAUDERDALE • SAVANNAH

TOXICITY CHARTERISTIC LEACHING PROCEDURE

CLIENT: ENGINEERS & SCIENTIST
SAMPLE NUMBER: 042-091994
LOCATION: 9277/COMBINED SLUDGE
ADDITIONAL DATA: IPC PLANT CITY, FL
SAMPLED BY: PAT FOX, SPECTRUM
SUBMITTED BY: RALPH TARDIF, SPECTRUM
DATE SAMPLED: 09/16/94 1549
DATE REPORTED: OCT. 13 1994
REVISION: 0

FL DRINKING WATER: #86144
FL ENVIRONMENTAL: #E86006
GEORGIA: #2000
SOUTH CAROLINA: #96015
EPA: #FL095
FDER CQAP: #870206G
DATE RECEIVED: 09/19/94
SAMPLE MATRIX: SLUDGE

ANALYTE	METHOD	RESULT (- = <)	UNITS	REGULATORY CONC.	
ARSENIC TCLP	1311/7060	-0.002	mg/l	5.0	mg/l
BARIUM TCLP	1311/7080	0.55	mg/l	100.0	mg/l
CADMIUM TCLP	1311/7131	-0.02	mg/l	1.0	mg/l
CHROMIUM TCLP	1311/7191	-0.02	mg/l	5.0	mg/l
LEAD TCLP	1311/7421	0.20	mg/l	5.0	mg/l
MERCURY TCLP	1311/7471	0.0010	mg/l	0.2	mg/l
SELENIUM TCLP	1311/7740	-0.002	mg/l	1.0	mg/l
SILVER TCLP	1311/7760	0.09	mg/l	5.0	mg/l
CHLORDANE TCLP	1311/608	-0.1	ug/l	30	ug/l
2,4-D TCLP	1311/615	-0.01	ug/l	10000	ug/l
ENDRIN TCLP	1311/608	-0.01	ug/l	20	ug/l
HEPTACHLOR TCLP	1311/608	-0.01	ug/l	8	ug/l
LINDANE TCLP	1311/608	-0.01	ug/l	400	ug/l
METHOXYCHLOR TCLP	1311/608	-0.1	ug/l	10000	ug/l
TOXAPHENE TCLP	1311/608	-0.1	ug/l	500	ug/l
SILVEX TCLP	1311/615	-0.01	ug/l	1000	ug/l
BENZENE TCLP	1311/624	-0.2	ug/l	500	ug/l
CARBN TETRACHLORIDE TCLP	1311/624	-0.2	ug/l	500	ug/l
CHLOROBENZENE TCLP	1311/624	-0.2	ug/l	100000	ug/l
CHLOROFORM TCLP	1311/624	-0.2	ug/l	6000	ug/l
1,2-DICHLOROETHANE TCLP	1311/624	-0.2	ug/l	500	ug/l
1,1-DICHLORETHYLENE TCLP	1311/624	-0.2	ug/l	700	ug/l
HEXACHLOROETHANE TCLP	1311/624	-1	ug/l	3000	ug/l
METHYL ETHYL KETONE TCLP	1311/624	-1	ug/l	200000	ug/l
TETRACHLOROETHYLENE TCLP	1311/624	-0.2	ug/l	700	ug/l
TRICHLOROETHYLENE TCLP	1311/624	-0.2	ug/l	500	ug/l
VINYL CHLORIDE TCLP	1311/624	-0.2	ug/l	200	ug/l
O-CRESOL TCLP	1311/625	-1	ug/l	200000	ug/l
M-CRESOL TCLP	1311/625	-1	ug/l	200000	ug/l
P-CRESOL TCLP	1311/625	-1	ug/l	200000	ug/l
1,4-DICHLOROBENZENE TCLP	1311/625	-0.2	ug/l	7500	ug/l
2,4-DINITROTOLUENE TCLP	1311/625	-1	ug/l	130	ug/l
HEXACHLOROBENZENE TCLP	1311/625	-0.01	ug/l	130	ug/l
HEXACHLOROBUTADIENE TCLP	1311/625	-0.2	ug/l	500	ug/l
NITROBENZENE TCLP	1311/625	-1	ug/l	2000	ug/l
PENTACHLOROPHENOL TCLP	1311/625	-0.02	ug/l	100000	ug/l
PYRIDINE TCLP	1311/625	-1	ug/l	5000	ug/l
245-TRICHLOROPHENOL TCLP	1311/625	-1	ug/l	400000	ug/l
246-TRICHLOROPHENOL TCLP	1311/625	-1	ug/l	2000	ug/l

IF YOU HAVE ANY QUESTIONS PLEASE CONTACT ME.

LYLE A. JOHNSON
LABORATORY MANAGER

CHAIN OF CUSTODY RECORD

SPECTRUM
Laboratories, Inc. FORT LAUDERDALE • SAVANNAH

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

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

Project Name or Number	Client Name
9277	Clark Engineers-Scientists, Inc
Project Location	
IPC Plant City, FL	

LCN	Sample Number	Date	Time	Sample Matrix	Container (s)	Laboratory Analysis: TCLP ZHE	TCLP Metals	TCLP Extractables (SVOA)	TCLP VOA	Comments
042-091994	COMBINED SLUDGE	9-16-94	1549	SLUDGE	1	X	X	X	X	
										PER J. OLIVER
										$945.00

SAMPLED BY: P. Fox	Transfer Number	Item Number	Transfers Relinquished by:	Accepted by:	Date	Time
	1					
	2					
	3					
	4					

3/4/98 Enforcement Meeting 1300 hrs.

- BETH INTRODUCTION

- ANTIFREEZE 1. Reviewing paperwork
2.

* - Copy of Jiffy Lube letter needed. Won't do multible TCLP's

- TCLP letter of agreement on frequency of testing

- Consolidated — collection → distillation
50,000 → 100,000 - rail cars spotted at IPC.

- 72 hours you may recycle without a permit.

- IPC will not accept any manifested hazardous waste.

- Will not do things the same - TCLP
- Storage -

- ALLAN 818 551 2922 = CALIF. Study on Used oil
PLAZA - Dept of Toxic Control TANK BOTTOMS
Glendale, Calif. (Used Oil Expert)

- Calif. says - Tank bottoms for Used Oil tanks always non-hazardous

* Split the next time you clean-out a tank.

- SOLID WASTE PICK-UPS = + 1 out of 3 had TCLP

BIDS – JACKSONVILLE

– Tanks, 100% ~~or~~ tanks.

Material

★ – Secondary Containment – drip pan.
DEP will bring up next week technical Meeting

Anti Freeze – Both said not willing to
– more or antifreeze. penalty.

IPC said = we didn't have our deeds in row, but
we didn't harm the environment.

PRC

ENVIRONMENTAL LABORATORY, INC.

L-955491

ANALYTICAL REPORT

REPORTED: 10-25-95
RECEIVED: 10-09-95
WORK ORDER: L-955491

CLIENT: International Petroleum Corp. of DE
505 S. Market Street
Wilmington DE 19801

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

SAMPLING DATE: - - TIME: BY:

REPORT TO: Ms. Kelly Brown

TCLP VOLATILES

ANALYSIS	METHOD		RESULT	UNIT	DATE/INITIAL
1,1-Dichloroethene	8260	<	25	ug/L	10-17-95/DBC
1,2-Dichloroethane	8260	<	25	ug/L	10-17-95/DBC
Benzene	8260	<	25	ug/L	10-17-95/DBC
Carbon Tetrachloride	8260	<	25	ug/L	10-17-95/DBC
Chlorobenzene	8260	<	25	ug/L	10-17-95/DBC
Chloroform	8260	<	25	ug/L	10-17-95/DBC
Methyl ethyl ketone	8260	<	25	ug/L	10-17-95/DBC
Tetrachloroethene	8260	<	25	ug/L	10-17-95/DBC
Trichloroethene	8260	<	25	ug/L	10-17-95/DBC
Vinyl Chloride	8260	<	25	ug/L	10-17-95/DBC

TCLP SEMIVOLATILES

ANALYSIS	METHOD		RESULT	UNIT	DATE/INITIAL
1,4-Dichlorobenzene	8270	<	100	ug/L	10-20-95/DBC
2,4-Dinitrotoluene	8270	<	100	ug/L	10-20-95/DBC
2,4,5-Trichlorophenol	8270	<	100	ug/L	10-20-95/DBC
2,4,6-Trichlorophenol	8270	<	100	ug/L	10-20-95/DBC
Cresol, total	8270	<	100	ug/L	10-20-95/DBC
Hexachlorobenzene	8270	<	100	ug/L	10-20-95/DBC
Hexachlorobutadiene	8270	<	100	ug/L	10-20-95/DBC
Hexachloroethane	8270	<	100	ug/L	10-20-95/DBC
Nitrobenzene	8270	<	100	ug/L	10-20-95/DBC
Pentachlorophenol	8270	<	250	ug/L	10-20-95/DBC
Pyridine	8270	<	100	ug/L	10-20-95/DBC
m/p-Cresol	8270	<	100	ug/L	10-20-95/DBC
o-Cresol	8270	<	100	ug/L	10-20-95/DBC

TCLP PESTICIDES

ANALYSIS	METHOD		RESULT	UNIT	DATE/INITIAL
Chlordane	8081	<	15	ug/L	10-19-95/KLS
Endrin	8081	<	10	ug/L	10-19-95/KLS
Heptachlor	8081	<	4	ug/L	10-18-95/KLS
Heptachlor epoxide	8081	<	4	ug/L	10-18-95/KLS

L-955491

TCLP PESTICIDES

ANALYSIS	METHOD		RESULT	UNIT	DATE/INITIAL
Lindane	8081	<	50	ug/L	10-18-95/KLG
Methoxychlor	8081	<	500	ug/L	10-18-95/KLG
Toxaphene	8081	<	250	ug/L	10-18-95/KLG

TCLP INORGANICS

ANALYSIS	METHOD		RESULT	UNIT	DATE/INITIAL
Arsenic	6010	<	0.50	mg/L	10-24-95/BAK
Barium	6010		0.53	mg/L	10-24-95/BAK
Cadmium	6010	<	0.030	mg/L	10-24-95/BAK
Chromium	6010	<	0.05	mg/L	10-24-95/BAK
Lead	6010	<	0.20	mg/L	10-24-95/BAK
Mercury	7470	<	0.0005	mg/L	10-23-95/BTT
Selenium	6010	<	0.50	mg/L	10-24-95/BAK
Silver	6010	<	0.06	mg/L	10-24-95/BAK
pH, Final	9040		5.01	Units	10-13-95/BAK
pH, Initial	9040		7.58	Units	10-12-95/CEG

TCLP HERBICIDES

ANALYSIS	METHOD		RESULT	UNIT	DATE/INITIAL
2,4-D	8150*	<	5000	ug/L	10-20-95/KLG
2,4,5-TP (Silvex)	8150*	<	500	ug/L	10-20-95/KLG

*Esterification by Standard Method 6640.

Reviewed by:

Karen L. Merrill
Laboratory Director

Antifreeze 8.31

1. DAYTONA LINCOLN Mercury (SQG)

FAILED - tet. .891 5/29/97

pick-up 6/26/97 200 gallons

retest 9/30/97 PASS - to late

2. HALIFAX FORD Mercury (SQG)

FAILED - tet .741 7/9/97

pick-up 7/14/97 100 gallons

8/18/97 100 gallons

6/20/97 100 gallons * before profile, before testing

3. Honda Merritt Island

failed 1/28/97 - tet .700

pick-up 4/9/97 100 gallons

6/12/97 100 gallons

8/27/97 100 gallons

* Not CESQG - Generates 50 gal HAZ WASTE ANTI FREEZ each MONTH

4. Jim's Import.

failed - lead - 10.0 ppm 7/24/97

pick-up 7/28/97 40 gal

9/4/97 40 gal

9/29/97 50 gal

* NOT CESQG - Generates ≥ 30 gal per month

5. MAZDA Village

FAILED - TRIC 11.3 12/12/95

TET 18.4

Pick-ups

	12/12/95	320 gallons
	3/14/96	285 gallons
	5/14/96	110 gallons
	7/24/96	165 gallon
	9/19/96	110 gallons

* SQG based on generation

6. McNamara Pontiac (SQG)

FAILED	3/5/97	Tet 1.410
pickup	3/5/97	250 gallons
	4/28/97	250 gallons
	7/8/97	250 gallons

7. Moody Truck Center (SQG

failed - tet 1240 4/17/97

pickup 4/17/97 188 gallon

6/11/97 400 gallon

* NOT CESQG generates > 100 k

8. Florida Clark lift

failed - Lead 38.1 8/17/94

pick-up 5/7/97 200 gallons

8/4/97 200 gallons

FAX COVER SHEET

PHOSLAB, INC.

808 West Beacon Road
Lakeland, Florida 33803
Phone: 941-682-5897
Fax: 941-683-3279

SEND TO:	FROM:
Name: Mr. James Dregne	Name: Judy Ellis
Firm: FDEP	Date: 3/5/98
Fax Number: 813-744-6125	Time Sent:

☐ Urgent ☐ Reply ASAP ☐ Please comment ☐ Please review ☒ For your information

Subject: _____ Total pages, including cover: 7

COMMENTS:

Per your request.

MAR 05 '98 16:27 143 P02

P HoS Maletino

Progress Environmental Laboratories № 16106

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

IPC - Halifax Ford - Mercury (9-30-97)

Client: Halifax Ford (Mercury	Due Date(TAT):	TCLP-Lead	3-ORG
Project Mgr: Bill Posey	Fax Reports to: (813) 754-3789		
Project: Halifax Ford (Mercury	Bill to: International Oil IPC		
Project #:			
PO #:	Sampler's Initials:		

Station ID	Date	Time	PEL Lab #	# of Bttls	Pres								Remarks
Used Antifreeze	9.30	110		4									
													AMM code 75.185

Relinquished By:	Received By:	Date	Time	Project Notes
[signature]	[signature]			
Relinquished By: [signature]	Received By: Phoslab, Inc. J. Ellis	9/30/97	5:00AM	
Relinquished By:	Received By:	Date	Time	
Relinquished By:	Received By:	Date	Time	

PHOSLAB

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

Client: International Petroleum Corporation
105 South Alexander Street
Plant City, Florida 33566

Attn: Mr. Bill Posey
P. O. #:
Project: Halifax Ford/Mercury
Reference: Used Antifreeze

Sampled By: A.M. Malatino
Sample Date: 09-30-97
Date Received: 09-30-97
Analysis Date: 10-01-97
Analyzed By: GJF/JMC

CERTIFICATE OF ANALYSIS

TOXICITY CHARACTERISTIC LEACHING PROCEDURE
EPA METHOD 1311

Sample ID: Used Antifreeze

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

QA OFFICER

CHEMIST

FDER QA/QC #870308G

PHOS Malatino

Progress Environmental Laboratories

№ 17426

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

(9-3097)

IPC - McNamara Pontiac

Client: McNamara Pontiac	Due Date(TAT):																
Project Mgr: Rick Davis	Fax Reports to: (813) 754-3789																
Project: McNamara Pontiac	Bill to: International Oil Svc																
Project #:	IPC																
PO #:	Sampler's Initials:																
Station ID	Date	Time	PEL Lab #	# of Bttls	Pres												Remarks
Used Antifreeze	9-30	11:40		4													
																	AMM Code 75.185

Relinquished By:	Received By:	Date	Time	Project Notes
Relinquished By: Anthony M. Malatino	Received By: Phaslab, Inc. D. Ellis	9/30/97	5:00PM	
Relinquished By:	Received By:	Date	Time	
Relinquished By:	Received By:	Date	Time	

PHOSLAB

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

Client: International Petroleum Corporation
105 South Alexander Street
Plant City, Florida 33566

Attn: Mr. Rick Davis
P. O. #:
Project: McNamara Pontiac
Reference: Used Antifreeze

Sampled By: A.M. Malatino
Sample Date: 09-30-97
Date Received: 09-30-97
Analysis Date: 10-01-97
Analyzed By: GJF/JMC

CERTIFICATE OF ANALYSIS

TOXICITY CHARACTERISTIC LEACHING PROCEDURE
EPA METHOD 1311

Sample ID: Used Antifreeze

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

QA OFFICER

CHEMIST

FDER QA/QC #870308G

Phos Malatino
Progress Environmental Laboratories

№ 15183

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

IPC - Daytona Lincoln Mercury (9-30-97)

Client: Daytona Lincoln/Merc	Due Date(TAT):
Project Mgr: Leo James	Fax Reports to: (813) 754-3789
Project : Daytona Lincoln Mercury	Bill to: International Oil Sales
Project #:	IPC
PO #:	Sampler's Initials: LW

TCLP-Lead 3-0167

Station ID	Date	Time	PEL Lab #	# of Bttls	Pres									Remarks
Used Antifreeze	9-30	225		4										
														Acct Code 75.185

Relinquished By:	Received By:	Date	Time	Project Notes
[signature]	[signature] Malatino	9/30/97	0445	
Relinquished By: [signature]	Received By: Phoslab Inc. [signature]	Date 9/30/97	Time 5:00PM	
Relinquished By:	Received By:	Date	Time	
Relinquished By:	Received By:	Date	Time	

PHOSLAB

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

Client: International Petroleum Corporation
105 South Alexander Street
Plant City, Florida 33566

Attn: Mr. Leo James
P. O. #:
Project: Daytona Lincoln/Mercury
Reference: Used Antifreeze

Sampled By: A.M. Malatino
Sample Date: 09-30-97
Date Received: 09-30-97
Analysis Date: 10-01-97
Analyzed By: GJR/JMC

CERTIFICATE OF ANALYSIS

TOXICITY CHARACTERISTIC LEACHING PROCEDURE
EPA METHOD 1311

Sample ID: Use

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

QA OFFICER

FDER QA/QC #870308G

CHEMIST

PHOTOGRAPHS

Date Taken: _____

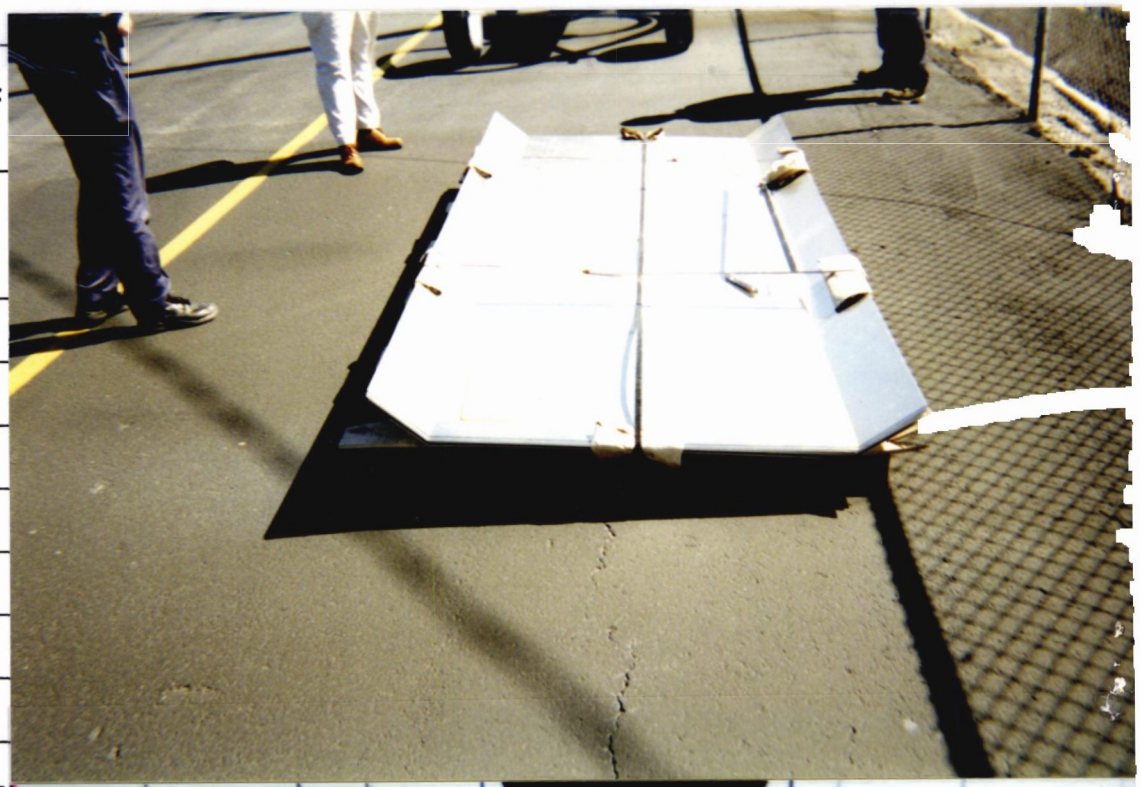
Taken By: _____

Site/Location: _____

Description:

- SECONDARY CONTAIN-
MENT.

- JACKSONVILLE BIDS



Draw North Arr

Description:

- SECONDARY
CONTAINMENT

- JACKSONVILLE BID

Draw North Arr

Department of Environmental Protection

Lawton Chiles
Governor

Southwest District
3804 Coconut Palm Drive
Tampa, Florida 33619

Virginia B. Wetherell
Secretary

Phoslab
806 W. Beacon Road
Lakeland, Fl 33803

March 5, 1998

ATTN: Judy Ellis

RE: Information Requests

Dear Ms. Ellis:

The Department is currently reviewing records involving anti-freeze and other waste samples collected by A. M. Malatino for International Petroleum Corporation. Request you provide the Department with copies of laboratory results and chain of custody documents for samples received at your laboratory from A. M. Malatino and International Petroleum Corporation on **September 30, 1997**.

Request that the requested documents be FAX to the Department as soon as possible. Our FAX # is (813) 744-6125. If you have any questions, please contact me at (813) 744-6100 ext. 379.

Sincerely,

James M. Dregne
Environmental Specialist II
Division of Waste Management

JD/jd

FDEP	3804 Coconut Palm Drive, Tampa, FL 33619-8318

FAX

Date: MARCH 5, 1998

Number of pages including cover sheet: 2

To:
Ms. ELLIS
PHOSLAB

Phone: (941) 682-5897
Fax phone: (941) 683-3279
CC:

From:
JIM DREGNE
HAZARDOUS WASTE SECTION
FDEP

Phone: (813) 744-6100 X379
Fax phone: (813) 744-6125

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

Transmit Confirmation Report

No.	:	010
Receiver	:	819416833279
Transmitter	:	WASTE MGT TAMPA SWDIST
Date	:	Mar 05 98 17:22
Time	:	01'17
Mode	:	Norm
Pages	:	02
Result	:	OK

Department of
Environmental Protection

Lawton Chiles
Governor

Southwest District
3804 Coconut Palm Drive
Tampa, Florida 33619

Virginia B. Wetherell
Secretary

DATE: MARCH 4, 1998

TIME:

SUBJECT: MEETING - INTERNATIONAL PETROLEUM CORP

ATTENDEES

Name	Affiliation	Telephone
JIM DREGNE	FDEP	(813) 744-6100 x379
Bob Knauss	FDEP	813/744-6100 x385
DAVID STRAHORN	PRM	540 736-9575
TONY McLATIN	McLatin & ASSOC/IPC	941-646-2828
CARRY R. ALLEN	IPC	813 754 1504
Roger Evans	FDEP	744-6100

INTERNATIONAL PETROLEUM CORPORATION

TELECOPIER COVER PAGE

NAME: Jim DREGNE

COMPANY: FDEP · HAZ WASTE SECTION

DATE: 2-13-98

SENT BY: GARRY R. ALLEN

NUMBER OF PAGES (INCLUDING COVER): 1

TELECOPIER NUMBER: 813-744-6125

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NOTES OR COMMENTS: I WOULD LIKE TO SET UP OUR MEETING AT YOUR OFFICE ON MARCH 4TH AT 1:30 P.M. PLEASE CONFIRM AT YOUR EARLIEST CONVENIENCE. "Thanks" Garry

If you do not receive the entire transmission, please contact:

NAME:

TELEPHONE NO.: (813) 754-1504 / (813) 229-1739 / (800) 282-9585

TELECOPIER NO.: (813) 754-3789

TELECOP.WK1

IFR · MEETING CONFIRMED WITH GARRY ALLEN AT 3:00PM, 13 FEB 98 MEETING 4 MAR 98

105 South Alexander Street, Plant City, Florida 33566
Area Code (813) 229-1739 Fla WATS 800-282-9585

FDEP	3804 Coconut Palm Drive, Tampa, FL 33619-8318

FAX

Date: FEBRUARY 9, 1998

Number of pages including cover sheet: 4

To:
GARRY ALLEN
INTERNATIONAL Petroleum

Phone: (813) 754-1504
Fax phone: (813) 754-3789
CC:

From:
JIM DREGNE
HAZARDOUS WASTE SECTION
SOUTHWEST DISTRICT

Phone: (813) 744-6100 x379
Fax phone: (813) 744-6125

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

GARRY:

LET ME KNOW OF A TIME FOR A MEETING AS SOON AS YOU KNOW.

THANKS JIM

International Petroleum Corporation
FLD 065680613, Project # 187521

PENALTY COMPUTATION WORKSHEET

Facility Name: **INTERNATIONAL PETROLEUM CORPORATION**

Facility Address: 105 South Alexander Street, Plant City, Florida, 33566

Penalty Computed By: James Dregne

Date: November 18, 1997

PART I - Class B (no penalty) Determination

Rationale: n/a

PART II - Class A Penalty Determination

	Violation Type	Potential for Harm	Extent of Deviation	Matrix Amount	Multi-Day	Adjustment	Total
1	40 CFR 262.11	major	major	$25,000			$25,000
2	40 CFR 263.20	moderate	moderate	$6,500	$5,000		$11,500
3	40 CFR 279.22(c)	minor	minor	$150			$150
4	40 CFR 279.54(c)(2)	major	moderate	$7,000			$7,000
5	403.727(3)(b)	moderate	major	$9,500	$8,000		$17,500

Total Penalties for All Violations: **$61,150.00**

EXHIBIT II

RANKING SYSTEM FOR POTENTIAL FOR HARM

Facility Name: **INTERNATIONAL PETROLEUM CORPORATION**

Rules Violated: 262.11

Nature of Waste: **4**

Category A = 8

Category B = 4

Volume of Waste: **8**

>26 drums = 8
6-25 drums = 5
1-5 drums = 2

Receptors: **4** + **3** = **7**

Discharge/Potential = 4
No Potential = 1

>1000 people = 4
100-1000 people = 3
10-100 = 2
<10 people = 1

TOTAL SCORE: **19**

MAJOR POTENTIAL FOR HARM: 19-24
MODERATE POTENTIAL FOR HARM: 13-18
MINOR POTENTIAL FOR HARM: 8-12

ASSIGNED BY: James M. Dregne DATE: November 17, 1997

RANKING SYSTEM FOR POTENTIAL FOR HARM

Facility Name: **INTERNATIONAL PETROLEUM CORPORATION**

Rules Violated: 263.20, 403.727(3)(b)

Nature of Waste: **4**

Category A = 8

Category B = 4

Volume of Waste: **2**

>26 drums = 8
6-25 drums = 5
1-5 drums = 2

Receptors: **4** + **3** = **7**

Discharge/Potential = 4
No Potential = 1

>1000 people = 4
100-1000 people = 3
10-100 = 2
<10 people = 1

TOTAL SCORE: **13**

MAJOR POTENTIAL FOR HARM: 19-24
MODERATE POTENTIAL FOR HARM: 13-18
MINOR POTENTIAL FOR HARM: 8-12

ASSIGNED BY: James M. Dregne DATE: November 17, 1997

Transmit Confirmation Report

No.	:	007
Receiver	:	97543789
Transmitter	:	WASTE MGT TAMPA SWDIST
Date	:	Feb 09 98 14:58
Time	:	02'10
Mode	:	Norm
Pages	:	04
Result	:	OK

Wast

STATE OF FLORIDA
DEPARTMENT OF ENVIRONMENTAL PROTECTION

DISTRICT ROUTING SLIP

To: Rick Garrity DATE: 2-2-98

CC To:

	PENSACOLA	**NORTHWEST DISTRICT**	
	Panama City	Northwest District Branch Office	
	Tallahassee	Northwest District Branch Office	
	Sopchoppy	Northwest District Satellite Office	
✓	**TAMPA**	**SOUTHWEST DISTRICT**	
	Punta Gorda	Southwest District Branch Office	
	Bartow	Southwest District Satellite Office	
	ORLANDO	**CENTRAL DISTRICT**	
	Melbourne	Central District Satellite Office	
	JACKSONVILLE	**NORTHEAST DISTRICT**	
	Gainesville	Northeast District Branch Office	
	FORT MYERS	**SOUTH DISTRICT**	
	Marathon	South District Branch Office	
	WEST PALM BEACH	**SOUTHEAST DISTRICT**	
	Port St. Lucie	Southeast District Branch Office	

☐ Reply Optional Date Due _____ ☐ Reply Required Date Due: _____ ☐ Info Only

Comments:

2 Civil Penalty Authorizations Attached

RECEIVED
FEB 04 1998
Department of Environmental Protection
SOUTHWEST DISTRICT

From: Larry Morgan BY Tel.: SC 278-9314

08-18-93

Memorandum

Florida Department of
Environmental Protection

TO: F. Perry Odom, General Counsel

FROM: Larry R. Morgan, Deputy General Counsel

DATE: 12/29/97

SUBJECT: Legal Sufficiency Review of Civil Penalty Authorization Memo

International Petroleum Corp

✓ The proposed penalties are consistent with the Department's penalty policy and are legally supportable.

_____ The proposed penalties are not consistent with the Department's penalty policy.

_____ The proposed penalties are not legally supportable.

Comments: _____

DEPARTMENT OF ENVIRONMENTAL PROTECTION
Civil Penalty Authorization
Southwest District

1. Type of Alleged Violation: Hazardous Waste

2. Investigator: James Dregne, Environmental Specialist II

3. Violator: **International Petroleum Corporation**

4. Location: 105 South Alexander Street, Plant City, Florida 33566

5. Date Submitted: December 4, 1997

6. Nature of Alleged Violation:

   During a routine compliance inspection, International Petroleum Corporation (IPC) was found to be in violation of regulations governing transporters of hazardous waste and used oil processors. The facility was also storing and treating hazardous waste antifreeze. These violations are summarized in Section 10 of the inspection report, which is attached as Exhibit I.

7. Penalty Rationale: International Petroleum Corporation has been in operation since 1984 and should be very familiar with regulations involving hazardous waste and used oil. The Department inspected the facility on February 7, 1985, March 18, 1986, and February 10, 1993. On April 19, 1993, the Department issued a Warning Letter to IPC citing them for failing to make a proper waste determination on waste that they were generating and disposing. On March 31, 1995, the Environmental Protection Commission of Hillsborough County issues a Warning Notice to IPC citing them with picking-up waste without a waste determination. The regulations governing the handling and disposal of waste antifreeze have been discussed with IPC management personnel on several occasions.

8. Penalty Recommendations:

   I recommend that $61,150.00 in civil penalties be sought against International Petroleum Corporation as calculated on the Penalty Computation Worksheet and Penalty Justification Worksheets attached as Exhibit II.

James Dregne
Environmental Specialist II

Elizabeth Knauss
Environmental Manager

Stanley Tam, PE
Professional Engineer II

William Kutash
Program Administrator

Richard D. Garrity, Ph.D.
Director of District Management

12/08/97
Date

J. Perry Odom
Perry F. Odom
General Counsel

1/30/98
Date

cc: Satish Kastury, HWR

PENALTY JUSTIFICATION
for
INTERNATIONAL PETROLEUM CORPORATION

Based Upon the Guidelines for Characterizing RCRA Violations, April 18, 1995

1. Regulation: 40 CFR 262.11

   Violation: The facility failed to determine if eleven truck loads of waste transported to Clark Environmental was a hazardous waste.

   Characterization of Violation:

   Guideline Entry - **3.1**

   Potential for Harm - **Major**

   Using the Potential for Harm Ranking System (score of 19), the Potential for Harm is Major.

   Extent of Deviation - **Major**

   In accordance with the Guidelines, the Extent of Deviation is Major.

2. Regulation: 40 CFR 263.20

   Violation: The facility transported hazardous waste antifreeze without a manifest.

   Characterization of Violation:

   Guideline Entry - **5.1**

   Potential for Harm - **Moderate**

   Using the Potential for Harm Ranking System (score of 13), the Potential for Harm is Moderate.

   Extent of Deviation - **Moderate**

   In accordance with the Guidelines, the Extent of Deviation is Moderate.

   Adjustment:

   Multi-Day Penalty - The RCRA Civil Penalty Policy of 1990 requires that a multi-day penalty be considered for violations categorized as moderate/moderate or below. The violations occurred during twenty-one shipments of hazardous waste antifreeze.

The bottom range amount from the multi-day penalty matrix for moderate/moderate violations was chosen - $250.00. This amount was multiplied by the number of violations after assessing the standard gravity-based amount for the first violation.

3. Regulation: 40 CFR 279.22(c)

   Violation: The facility failed to label two containers used to store used oil with the words "Used Oil".

   Characterization of Violation:

   Guideline Entry - **20.1**

   Potential for Harm - **Minor**

   In accordance with the Guidelines, the Potential for Harm is always Minor.

   Extent of Deviation - **Minor**

   In accordance with the Guidelines, the Extent of Deviation is Minor.

4. Regulation: 40 CFR 279.54(c)(2)

   Violation: The facility failed to provide adequate secondary containment for rail cars containing used oil.

   Characterization of Violation:

   Guideline Entry - **28.2**

   Potential for Harm - **Major**

   In accordance with the Guidelines, the Potential for Harm is Major.

   Extent of Deviation - **Moderate**

   In accordance with the Guidelines, the Extent of Deviation is Major. Moderate was chosen because the facility had secondary containment, but it was not adequate.

5. Regulation: 403.727(3)(b), F.S.

   Violation: The facility stored and treated hazardous waste antifreeze without notifying as a hazardous waste facility, obtaining a permit or without complying with 40 CFR Part 264 standards.

   Characterization of Violation:

   Guideline Entry - **17.2**

   Potential for Harm - **Moderate**

In accordance with the Guidelines, the Potential for Harm is Moderate.

Extent of Deviation - **Major**

In accordance with the Guidelines, the Extent of Deviation is Major.

Adjustment:

Multi-Day Penalty - The RCRA Civil Penalty Policy of 1990 requires that a multi-day penalty be calculated for violations categorized as moderate/major or above. The violation occurred on twenty-one separate occasions.

The bottom range amount from the multi-day penalty matrix for moderate/major violations was chosen - $400.00. This amount was multiplied by the number of violations after assessing the standard gravity-based amount for the first violation.

9. Facility and Process Description:

International Petroleum Corporation (IPC) was inspected on September 17, 1997, to evaluate its compliance with state and federal hazardous waste and used oil regulations. Follow-up visits were conducted on September 23 and October 7 & 17, 1997, to review company records. The inspection determined that the facility was primarily a generator, transporter, marketer, and processor of used oil. The inspection also determined that IPC was accepting, transporting, and treating hazardous waste antifreeze. The inspection team was accompanied throughout the inspection by the company's president, Mr. Garry Allen. Three follow-up visits were made to the facility to review records.

International Petroleum Corporation specializes in the re-refining of on-spec used oil. IPC produces a fuel oil that is equivalent to Virgin No. 5 Fuel Oil and a flotation oil for the phosphate industry. It has been at its current locations since 1984 and is currently employing about 35 people. The eight acre site contains an oil re-refinery facility, an industrial wastewater pre-treatment facility, storage tanks, maintenance garage, and administration building. According to Mr. Allen, the facility does not accept off spec used oil or hazardous waste. On occasions, the company may act as a broker for the disposal of hazardous waste for some IPC clients. The hazardous waste that is brokered is not transported by or to IPC, but is transported directly from the generator to the disposal facility.

The tank farm at IPC consist of 22 steel above-ground tanks. The total capacity of the tanks is approximately 1,267,000 gallons in the 20 tanks that are used to store used and re-refined oil. The facility also has two tanks used to store industrial waste water and oil contaminated water. Secondary containment for the tanks was found to be in adequate condition.

Used Oil and Oily Waste Products

Used oil and petroleum contaminated products including off spec virgin fuels, are processed into an on-specification used oil fuel using a multi stage distillation system. Water that is distilled from the used oil is pretreated in the company's wastewater treatment unit prior to being discharged to the City of Plant City POTW. The light distillates are burned in a furnace on site and provide the energy for the re-refinery process.

Used oil and petroleum contaminated products are delivered to the IPC facility via tanker trucks and rail tanker cars. The used oil products are pumped from tankers and rail cars through 40 mesh filter baskets to a 212,000 gallon above ground storage tank. The tank, No.83, is labeled "Used Oil". Used oil from tank No.83 is fed by above ground piping to the processing unit where it is processed through an atmospheric distillation column and a vacuum distillation column. The re-refined oil is then transferred to tank No.150. Normally the re-refined oil in tank No.150 is transferred to tank No.552 once a day. The processed oil in tank No. 552 is sampled and tested to determine if it meets used oil specifications. If the used oil meets specifications, it is released by IPC for shipment to clients or it is further blended.

Used Oil Filters

Crushed and uncrushed used oil filters are processed inside the southern side of the maintenance garage. Approximately 600 drums of used oil filters are delivered to the facility each month. Crushed filters are transferred into totes that are used to transport the filters to a metal recycler. Uncrushed used oil filters are dumped onto one of two processing tables where they are drained and inspected. All non metal filters are separated and disposed of into a solid waste roll off. The metal filters are crushed and put into totes. The crushed oil filters are shipped to U.S. Foundry in Medley, Florida, for smelting. At the time of the

EXHIBIT I

inspection, fifteen drums of used oil filters were awaiting processing. All drums were properly labeled and closed. Beneath the two inspection/draining tables were containers used to collect the used oil from the filters. The containers were not labeled "Used Oil" in violation of **40 CFR 279.22(c)**. The used oil collected during the used oil filter processing is pumped into a 250 gallon AST in the garage. The AST was properly labeled "Used Oil". Oil collected in this tank is transferred to tank No.83 before going through the re-refining process.

After the filters have been removed from the 55 gallon drums, the empty drums are transferred to a drum wash area located at the west end of the product oil tank farm. The drums are pressured washed with water. Diesel or kerosene are used to cut the oil. The oily waste from the drum cleaning operation drains to a sump next to the wash area. The oily waste is pumped from the sump, via above ground piping, to used oil tank No. 83. If the waste generated at the wash area is water, a valve can be used to route the wastewater to Tanks SKE or SKW. The above ground piping from the sump was labeled "Used Oil".

Wastewater

Wastewater, including petroleum contact water (PCW), industrial wastewater, rainwater collected in secondary areas, and water distilled from the used oil is accumulated in two 47,000 gallon AST's, tanks SKE and SKW. The wastewater is treated in a pre-treatment system consisting of gravity separation, chemical treatment, flocculation, coagulation, and dissolved air flotation. Any oil recovered from the tanks by gravity separation or dissolved air flotation is pumped to tank No.83 for re-refining. Following pre-treatment of the wastewater in the IPC pre-treatment unit, the pre-treated water is discharged to the City of Plant City POTW.

Used Antifreeze

Used antifreeze is processed at the facility in the same manner as used oil. Used antifreeze picked-up by IPC drivers is place in a separate compartment in the tanker trucks. When the truck arrives at the IPC facility, the waste antifreeze is pumped into tank No.83 with the used oil. The antifreeze is processed in the same manner as the used oil. The ethylene glycol from the antifreeze is not reclaimed during the processing. According to Mr. Allen, IPC requires a hazardous waste determination be made prior to the acceptance of any used antifreeze from generators. Some antifreeze was picked-up from small quantity generators before proper waste determinations were conducted. Antifreeze picked-up at Jiffy Lube facilities was consolidated into one waste determination. This practice should stop immediately. A separate waste determination is necessary for each facility.

A waste determination is required of all antifreeze generated by small quantity generators that is destined for disposal. Contaminants of concerns that have been identified by the Department are benzene, trichloroethylene, tetrachlorethylene, and lead. The maximum concentrations for the toxicity characteristic for these four contaminants are as follows:

Contaminant	Regulatory Level
Benzene	0.5 mg/L
Tetrachloroethylene	0.7 mg/L
Trichloroethylene	0.5 mg/L
Lead	5.0 mg/L

A review of IPC records showed that the analysis of used antifreeze from eight clients was hazardous for one or more of the contaminants of concern. The company's records also showed that the hazardous waste

antifreeze was managed as non-hazardous and was accepted for processing at IPC. Twenty-one shipments of hazardous waste antifreeze were accepted and processed by IPC between December 12, 1995 and September 1997. The following IPC client's used antifreeze was determined to be hazardous based on analysis from state certified laboratories:

#	Generator	Date of Analysis	Laboratory	Contaminant	Results	Pickups
1.	Daytona Linc/Merc	5/29/97	Progress Env.	Tetrachloro.	.891 mg/L	1
2.	Halifax Ford Mercury	7/14/97	Progress	Tetrachloro.	.714 mg/L	3
3.	Honda, Merritt Island	1/28/97	Enco	Tetrachloro.	.700 mg/L	3
4.	Jim's Import Auto	8/1/97	Progress	Lead	10.0 mg/L	2
5.	Mazda Village	12/12/95	Enco	Trichloro.	11.3 mg/L	5
				Tetrachloro.	18.4 mg/L	
6.	McNamara Pontiac	3/5/97	Progress	Tetrachloro.	1.41 mg/L	3
7.	Moody Truck Center	4/25/97	Progress	Tetrachloro.	1.24 mg/L	2
8.	Florida Clark Lift	8/17/97	HOWCO	Lead	38.1 mg/L	2

The Department found additional cases of hazardous waste antifreeze being handled by IPC from conditionally exempt small quantity generators (CESQG). A CESQG's hazardous wastes are not subject to regulation under Parts 262 through 266 of 40 C.F.R.. In some of these instances, IPC determined that the client was a CESQG after the hazardous waste was picked-up and treated. IPC should institute a procedure that ensures that waste antifreeze is not handled until a proper waste determination is made and after it is confirmed that the client is not subject to the hazardous waste regulations in Parts 262 through 266 of 40 C.F.R.

IPC failed to file a written notification with the Department that it was transporting and treating hazardous waste. The hazardous waste antifreeze was being stored in Tank No.83. IPC failed to comply with the requirements governing the storage of hazardous waste in a tank system. Storing and treating hazardous waste without notifying as a hazardous waste facility, obtaining a permit or complying with 40 CFR Part 264 standards is a violation of **403.727(3)(b), F.S.** It is also a violation of **40 CFR 263.20** for a transporter to accept hazardous waste (antifreeze) from a small quantity generator unless it is accompanied by a manifest signed in accordance with the provisions of 40 CFR 262.20.

Solid Waste

Solid waste managed at the facility includes oily solid waste generated by IPC and clients. Oil contaminated solid waste is picked-up by IPC as a service to their clients. The solid waste handled by IPC includes filter basket debris, sludge, absorbent, contaminated dirt, and rags. This waste is managed as non hazardous and sent to Clark Environmental Incorporated (Clark) for disposal.

A large amount of the solid waste generated by IPC comes from the clean-out of the lint traps and sumps. The company has done extensive analysis of this waste stream and determined it to be non hazardous. The Department did split sampling of this waste stream previously and confirmed that the lint and sludge was non hazardous. The waste profile document for this waste stream was prepared on August 19, 1991, and is on file with Clark.

A review of records at IPC and Clark show that there has been at least thirteen shipments of waste from IPC to Clark in 1997 using the 1991 waste profile document described as "filter cleaning and soil". A closer review of these shipments shows that they included drums of solid waste from clients and waste from IPC that is not reflective of the 1991 profile document. The solid waste collected from clients did not

include a waste determination and may have been a hazardous waste. On March 10, 14 &17, 1997, eleven truck loads of soil, sand and sludge, were manifested to Clark as non hazardous using the 1991 profile document. This waste was generated at IPC from the cleaning of storage tanks and rail cars. No waste determination was performed on this waste in violation of **40 CFR 262.11.**

IPC was cited during a Department inspection in February 10, 1993, for failing to make waste determinations for 18 of 20 shipments of waste from IPC to Clark Environmental. This practice of failing to make a proper waste determination has continued.

Transportation

The majority of used oil, used oil filters, and oily wastes are brought to the facility by International Oil Service (IOS) tanker trucks owned by IPC. Used oil and oily waste are also delivered by common carriers, independent oil transporters and tanker rail cars. IOS has a fleet of 18 trucks that are maintained at the IPC maintenance garage. The IOS trucks are also used to deliver products to customers. According to Mr. Allen, the company has only had one traffic accident with a tanker truck and there was no spill of used oil at the time. The facility ID number is displayed on each vehicle.

A rail spur is located along the south side of the facility. Used oil delivered by rail only stays at the facility for a few days depending on the time it is staged at the spur. The spur lacked adequate containment to prevent the migration of used oil out of the system in violation of **40 CFR 279.54(c)(2).**

Contingency Plans

The facility had adequate emergency communication, fire protection, and spill control equipment appropriate for the waste being handled at the facility. The facility had both a public address system and bell alarm system to notify employees of a plant emergency. The facility was equipped with 32 fire extinguishers, seven hose and reel systems, and a fire suppression system. The equipment is operational and is inspected annually by Sunstate Fire Extinguisher Service, Lake Wales, Florida. The equipment was last inspected in June 1997.

Records

The company notified the state of its used oil activities. The company applied for registration as a used oil transporter, marketer, processor and used oil filter transporter, transfer facility, processor on February 26, 1997. The registration was for the period July 1, 1997 to June 30, 1998. Copies of licenses, registrations and authorization documents were posted on the wall in Mr. Allen's office. The transporter ID number is also painted on each IPC vehicle. The annual collection report submitted for 1996 showed that the company collected 18,279,791 gallons of used oil and 1,046,175 used oil filters. Certification of required accident insurance is being maintained. Current insurance is with National Union Fire Insurance Company.

All receipts for pick-up and delivery of used oil products are maintained in the administration office. These records are complete and very well organized. Pick-up receipts from generators are maintained by driver and date of pick-up. The EPA ID number of the generator is not on the pick-up receipts, but the EPA ID numbers for all used oil generators that have ID numbers is maintained on a company printout. Receipts for the used oil delivered to the plant are also maintained for each driver by day.

10. Summary of Alleged Violations:

40 CFR 262.11	A person who generates a solid waste, as defined in 40 CFR 261.2 must determine if that waste is a hazardous waste. Such a determination had not occurred for eleven loads of waste from International Petroleum Corporation to Clark Environmental.
40 CFR 263.20	Transportation of hazardous waste antifreeze without a manifest.
40 CFR 279.22(c)	Failure to label two containers used to store used oil with the words "Used Oil".
40 CFR 279.54(c)(2)	Failure to provide adequate secondary containment for rail cars containing used oil.
403.727(3)(b), F.S.	Storing and treating hazardous waste without notifying as a hazardous waste facility, obtaining a permit or without complying with 40 CFR Part 264 standards.

Report prepared by: _____
James M. Dregne
Environmental Specialist II

Approved by: _____ Date: 11/18/97
Elizabeth B. Knauss
Environmental Manager

International Petroleum Corporation
FLD 065680613, Project # 187521

PENALTY COMPUTATION WORKSHEET

Facility Name: **INTERNATIONAL PETROLEUM CORPORATION**

Facility Address: 105 South Alexander Street, Plant City, Florida, 33566

Penalty Computed By: James Dregne

Date: November 18, 1997

PART I - Class B (no penalty) Determination

Rationale: n/a

PART II - Class A Penalty Determination

	Violation Type	Potential for Harm	Extent of Deviation	Matrix Amount	Multi-Day	Adjustment	Total
1	40 CFR 262.11	major	major	$25,000			$25,000
2	40 CFR 263.20	moderate	moderate	$6,500	$5,000		$11,500
3	40 CFR 279.22(c)	minor	minor	$150			$150
4	40 CFR 279.54(c)(2)	major	moderate	$7,000			$7,000
5	403.727(3)(b)	moderate	major	$9,500	$8,000		$17,500

Total Penalties for All Violations: **$61,150.00**

EXHIBIT II

RANKING SYSTEM FOR POTENTIAL FOR HARM

Facility Name: **INTERNATIONAL PETROLEUM CORPORATION**

Rules Violated: 262.11

Nature of Waste: **4**

Category A = 8

Category B = 4

Volume of Waste: **8**

>26 drums = 8
6-25 drums = 5
1-5 drums = 2

Receptors: **4** + **3** = **7**

Discharge/ Potential = 4	>1000 people = 4
No Potential = 1	100-1000 people = 3
	10-100 = 2
	<10 people = 1

TOTAL SCORE: **19**

MAJOR POTENTIAL FOR HARM:	19-24
MODERATE POTENTIAL FOR HARM:	13-18
MINOR POTENTIAL FOR HARM:	8-12

ASSIGNED BY: James M. Dregne DATE: November 17, 1997

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MODERATE POTENTIAL FOR HARM: 13-18
MINOR POTENTIAL FOR HARM: 8-12

ASSIGNED BY: James M. Dregne DATE: November 17, 1997

Florida Department of

Memorandum **Environmental Protection**

TO: **James Dregne**, Environmental Specialist
Beth Knauss, Environmental Manager
Hazardous Waste Regulation Section, Southwest District

THROUGH: **Satish Kastury**, Environmental Administrator
Michael Redig, Environmental Manager

FROM: **Stephanie Syler**, Environmental Specialist
Hazardous Waste Regulation Section, Tallahassee

DATE: December 18, 1997

SUBJECT: **Draft Civil Penalty Authorization Memo (CPAM) Review of International Petroleum Corporation - FLD065680613**

I have reviewed the draft CPAM for International Petroleum Corporation, received in this office December 5, 1997. Per our telephone discussions and e-mail of December 12, 1997 you responded to two areas in your draft memo where I requested clarification. These areas concerned:

- a value of four (4) assigned to potential discharge of material
- an error in assigning the Extent of Deviation as always minor for failure to label tanks/containers with the words "Used Oil".

This latter error had already been corrected by you prior to our discussion. Your reason for assigning the potential discharge value of four (4) was also clarified.

The Civil Penalty Authorization for International Petroleum Corporation is in accordance with the May 17, 1995 Revised Guidelines for Characterizing RCRA Violations and the September 17, 1996 Revised Guidelines for Characterizing Used Oil Violations. Please forward a copy of the final signed CPAM to this office when completed. Thank you.

SS

cc: Larry Morgan, OGC
Agusta Posner, OGC

INTERNATIONAL PETROLEUM CORPORATION

December 15, 1997

Attn: Richard Garrity
Department of Environmental Protection
Southwest District
3804 Coconut Palm Drive
Tampa, Fl 33619

RE: WARNING LETTER # 187521
Sent by :Hand Delivered

Dear Mr. Garrity:

We have reviewed your letter of December 1, 1997. We would like the opportunity to meet with you and your staff to discuss these issues prior to any formal response. We will want to include our consultant from California. Please advise us of your availability and suggested meeting dates.

IPC does not intend to accept hazardous waste. We have management programs in place to avoid that. However, we recognize that these programs can always be improved and we welcome your input and assistance. Working together, we should be able to develop procedures which could become the model for all used oil recyclers in Florida.

Please give me a call if you have any questions.

Sincerely,

Garry R. Allen
President

Cc: Jim Dregne

105 South Alexander Street, Plant City, Florida 33566
Area Code (813) 229-1739 • Fla. WATS 800-282-9585

Florida Department of

Memorandum **Environmental Protection**

ENFORCEMENT/COMPLIANCE COVER MEMO

TO: ☒ Richard Garrity, Ph.D., Director of District Management
☐ William Kutash, Environmental Administrator
☐ Office of General Counsel, ATTN:_____

FROM/THROUGH: William Kutash, Environmental Administrator
STT Stanley Tam, Professional Engineer II
EK Elizabeth Knauss, Environmental Manager
JD Jim Dregne, Environmental Specialist II

mailed 12/18/97 BR

DATE: December 4, 1997

FILE NAME: **INTERNATIONAL PETROLEUM CORPORATION** PROJECT #:187521

PROGRAM: Hazardous Waste COUNTY: Hillsborough

TYPE OF DOCUMENT:

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

DESCRIPTION OF VIOLATIONS: IPC generates, transports, markets and processes used oil and generates and transports used oil filters. IPC also handled used antifreeze from some of its clients. Some of the antifreeze was determined to be a hazardous waste, but was transported, stored and treated by IPC. The company did not notify the state of these hazardous waste activities. The storage tank used to store the hazardous waste antifreeze was not certified to store hazardous waste. The company also generated solid waste that did not have a waste determination. The handling of solid waste without a waste determination was a recurring violation.

SUMMARY OF CORRECTIVE ACTIONS: The facility must comply with hazardous waste rules and enter into a consent order and pay a penalty.

PENALTY SUMMARY:

Potential for Harm: Major Extent of Deviation: Major

Penalty Amount: Pending Expenses: Pending

TOTAL PENALTY AMOUNT: Pending ☐ TO SECRETARY

INTERNATIONAL PETROLEUM CORPORATION

December 15, 1997

Attn: Richard D. Garrity, Ph.D.
Department of Environmental Protection
Southwest District
3804 Coconut Palm Drive
Tampa, Fl 33619

RE: WARNING LETTER # 187521
Sent by :Hand Delivered

Dear Mr. Garrity:

We have reviewed your letter of December 1, 1997. We would like the opportunity to meet with you and your staff to discuss these issues prior to any formal response. We will want to include our consultant from California. Please advise us of your availability and suggested meeting dates.

IPC does not intend to accept hazardous waste. We have management programs in place to avoid that. However, we recognize that these programs can always be improved and we welcome your input and assistance. Working together, we should be able to develop procedures which could become the model for all used oil recyclers in Florida.

Please give me a call if you have any questions.

Sincerely,

Garry R. Allen
President
Cc: Jim Dregne

105 South Alexander Street, Plant City, Florida 33566
Area Code (813) 229-1739 • Fla. WATS 800-282-9585

Date: 12/12/97 6:28:26
From: Stephanie Syler TAL
Subject: International Petroleum Coporation - Civil Penalty review
To: James Dregne TPA
CC: Beth Knauss TPA
CC: Michael Redig TAL

Jim

Per our telephone discussion today on the above facility, your Penalty Authorization appears to be in order. You will receive a final memo, as we discussed, indicating this.

For my file, we discussed two areas where clarification was requested. One area concerned your assigning a value of 4 for potential discharge of material which was not determined by the facility to be hazardous waste but which was, in fact, hazardous. My assumption of your reasoning for assigning this value, that the material was handled and managed by employees and stored as non-hazardous waste, without containment in the rail spur area for instance, was verified. In addition, you stated the waste was treated and may have been burned (which is also referenced in your inspection report), thereby indicating potential release or discharge. The other area of discussion concerned an error in stating that the Extent of Deviation is always minor regarding the failure to label tanks/containers with the words "used oil", when in fact the Extent of Deviation must be determined based on the volume of used oil stored on site. You stated you had already noticed this error and corrected it in your report.

I'll send the hard copy memo out early next week. Meanwhile, this stands as acceptance of your penalty authorization. Thanks.

Stephanie

Date: 12/12/97 1:50:42
From: Stephanie Syler TAL
Subject: IPC Penalty
To: James Dregne TPA

Hi there Jim

Finished reviewing your penalty IPC. I have a few points I need you to clarify. I'm informed that henceforth we are to send formal memos of our penalty review to districts with copies to OGC. (You could share that with Beth as an FYI, if you don't mind). My intention is to first clarify with the district penalty writer anything I need more certainty on and then send off a memo which basically states everything looks fine to me! You may ask, is this exercise necessary? Well, uh, hmmm, - hey, I just work here.

Anyhow -

1) On the potential for discharge - you give it a 4. Is that basically because the material had not been determined to be haz. waste when it actually was haz. waste; therefore the handling of it as non-haz. could lead to spillage, something like that? I just want to make sure I understand your reasoning. I can understand the storage on the rail spur which was not contained, but am less certain about the material in the storage tanks (which I assume are contained) and a potential discharge.

2) On your Penalty Justification form, item 3., Reg. 40 CFR 279.22(c), labeling used oil containers. I think you got the Potential for Harm and Extent of Deviation reversed when you looked at the Guideline 20.1. Check it out again. The Potential for Harm is always minor; the Extent of Deviation has to be determined as major, moderate or minor. Was the unlabeled used oil less than 25% of the volume stored on site? Ate we looking at the same revised used oil guidelines for characterizing violations, of September 17 1996?

I do believe that's all. After I hear from you, I'll send out the memo. Oh, nice hearing from you again! You've made my weekend Jim.

Stephanie.

CLARK
engineers - scientists

December 2, 1997

Ms. Elizabeth B. Knauss
Environmental Manager
Hazardous Waste Section
Division of Waste Management
Florida Department of Environmental Protection
Southwest District
3804 Coconut Palm Drive
Tampa, Florida 33619

Re: International Petroleum Corporation
105 South Alexander Street
Plant City, Florida 33566

Dear Ms. Knauss:

On behalf of our client, International Petroleum Corporation (IPC), the firm of Edward E. Clark Engineers-Scientists, Inc. (CLARK) is submitting a copy of the 1997 Waste Characterization Report. This report constitutes IPC's yearly chemical characterization of the sludge (sump and pump filter basket lint) for the purposes of disposal as non-hazardous waste.

Please contact me at (305) 233-1411 with any comments or questions you may have.

Yours truly,

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

EEC/bjk

cc: G. Allen, IPC

Project 9277.02

955 PRAIRIE INDUSTRIAL PARKWAY for Gary B03 - Solids 9¢ FAX: (813) 425-4642
MULBERRY, FL 33860 B02 S-20% 10¢/lb
$65
D04 - Light Debris

PROFILE DOCUMENT

~~B03~~ ~~Sludge~~ 142 - B01 15¢/lb J Cook

GENERATOR: International Petroleum Corp   GENERATOR #: 142 - D01 $115⁰⁰/55 gal
142 - D02 Sludge/0.18 $85 55.
SITE ADDRESS: 105 S. Alexander Street   BROKER: 142 - D03 Liquid $45⁰⁰/55 gal

MAILING ADDRESS: ____   CONTACT: Garry Allen

CITY: Plant City   STATE: Fla   ZIP: 33566   TELEPHONE: 813-754-1504

TELEPHONE: ____   EPA ID #: ____   ADDRESS: 142 - BC01 7¢/lb
142 - BC03 4 ¢/lb solids

TYPE OF BUSINESS: Oil Recycler

PROCESS DESCRIPTION: Filter Cleaning & Soil

PROPER D.O.T. SHIPPING NAME: Industrial Waste Non-Regulated

COMPOSITION:

Composition	%
Soil & Sand	>90 %
Petroleum	<10 %
Filter Debris	<15 %
	%
	%
	%
	%
	%

1. SINGLE PHASE(X) BI-LAYERED( ) MULTI-LAYERED( )
2. LIQUID( ) SEMI-SOLID( ) SOLID(X) LIQUID & SOLID( )
3. SOLIDS: <1( ) 1-5( ) 5-10( ) 10-20( ) 20-30( ) >30%(X)
4. BTU/LB: <5000(X) 5000-7500( ) 7500-9000( ) 9000-10500( ) >10500( )
5. WATER: <1(X) 1-5( ) 5-10( ) 10-20( ) 20-50( ) >50( )
6. CHLORIDES %: 0.1-0.5(X) 0.5-1.0( ) 1.0-5.0( ) 5-10( ) 10-20( ) >20(
7. FLASH POINT: <70( ) 70-100( ) 100-140( ) 140-200( ) >200° F(X)
8. PH: ≤2( ) 2-5( ) 5-7( ) 7(X) 7-10( ) 10-12( ) ≥12.5( )
9. SPECIFIC GRAVITY: 0.8-0.9( ) 0.9-0.99( ) 1.0-1.1( ) 1.1-1.3( ) >1.3(X)

COLOR: Varies   ODOR: Musty

7600 lbs

INDICATE IF THE WASTE CONTAINS ANY OF THE FOLLOWING AND THE AMOUNTS. IF NONE PRESENT, WRITE 0 (ZERO).

#	CONSTITUENT	TC REG. PPM	CALIF. LIST PPM	ACTUAL PPM
D004	ARSENIC	X <5	>500	
D005	BARIUM	<100	N/A	
D006	CADMIUM	<1	>100	
D007	CHROMIUM	<5	>500	
D008	LEAD	<5	>500	
D009	MERCURY	<0.2	<0.2	
D010	SELENIUM	<1	>100	
D011	SILVER	<5	N/A	
	COPPER	N/A	N/A	
	NICKEL	N/A	N/A	
	THALLIUM	N/A	N/A	
	ZINC	N/A	N/A	
D012	ENDRIN	<0.02		
D013	LINDANE	<0.4		
D014	METHOXYCHLOR	<10		
D015	TOXAPHENE	<0.5		
D016	2,4 D	<10		
D017	2,4,5,T SILVEX	<1.0		
D018	BENZENE	<0.5		
D019	CARBON TET.	<0.5		
D020	CHLORDANE	<0.03		
D021	CHLOROBENZENE	<100		

#	CONSTITUENT	TC REG. PPM	ACTUAL PPM
D022	CHLOROFORM	X <6.0	
D023	O-CRESOL	<200	
D024	M-CRESOL	<200	
D025	P-CRESOL	<200	
D026	CRESOLS	<200	
D027	1,2 DICHLOROBENZENE	<7.5	
D028	1,4 DICHLOROETHANE	0.5	
D029	1,1 DICHLORETHYLENE	<0.7	
D030	2,4 DINITROTOLUENE	<0.13	
D031	HEPTACHLOR	<0.008	
D032	HEXACHLOROBENZENE	<0.13	
D033	HEXACHLOROBUTADIENE	<0.5	
D034	HEXACHLOROETHANE	<3.0	
D035	METHYL ETHYL KETONE	<200	
D036	NITROBENZENE	<2.0	
D037	PENTACHLOROPHENOL	<100	
D038	PYRIDINE	<5.0	
D039	TETRACHLOROETHYLENE	<0.7	
D040	TRICHLOROETHYLENE	<400	
D041	2,4,5 TRICHLOROPHENOL	<0.5	
D042	2,4,6 TRICHLOROPHENOL	<2.0	
D043	VINYL CHLORIDE	<2.0	
	PCB'S	<50	

ANTICIPATED VOLUME: 23-30 DRUMS ____ GALLONS ____ LBS / PER X 1X ____ MONTH ____ QUARTER

TYPE CONTAINER: 17 H   SIZE: 55 gal   SAMPLE INCLUDED: Y N

ATTACH ALL MSDS' AND CURRENT ANALYSIS. I CERTIFY THAT ALL INFORMATION SUBMITTED IS ACCURATE AND THIS MATERIAL IS A NON-RCRA MATERIAL AND/OR WASTE.

GENERATOR'S SIGNATURE Randy Endicott   DATE 8-19-91

650 ×27 4550 1300
55 ×27 385 110

PHOSLAB

806 W. Beacon Road • Lakeland, Florida 33803

Client: Clark Environmental, Inc.
755 Prairie Industrial Parkway
Mulberry, Florida 33860

		Sampled By:	JC
Attn:	Mr. Jim Clark	Sample Date:	1-31-92
P.O. #		Date Received:	1-31-92
Project:	136-SO1/142-SO1	Analysis Date:	2-4-92
Reference:		Analyzed By:	GJF/JMC

CERTIFICATE OF ANALYSIS

TOXICITY CHARACTERISTIC LEACHING PROCEDURE
EPA METHOD 1311

SAMPLE ID: 142-SO1

	Conc., mg/L
Tetrachloroethylene	0.030

QA OFFICER/

CHEMIST

INTERNATIONAL ENVIRONMENTAL SERVICES, INC.
105 South Alexander St • Plant City Florida 33566 • (813) 754-2373
Tampa (813) 229-0879 • Miami Office 1-800-537-9875 • FAX (813) 754-3789
Florida Wats 1-800-762-1104

IES

CERTIFIED ANALYSIS

TO: Mr. Carry Allen
International Petroleum Corp
105 S. Alexander St.
Plant City, FL 33564

PROJECT NO:
SAMPLED BY: T. Malatino
DATE COLLECTED: 08/06/91
DATE COMPLETED: 08/16/91

IES SAMPLE #: 80691-007-IPC
Source: IPC-FL 13 Drum Composite (OIL)
Description: 1,2,3,5,13,14,15,16,17,21,2[illegible].26
Client's ID: Oil Composite

METALS:	RESULTS		
Cadmium	0.8		
Chromium	8.[illegible]		
Lead			
TCLP Lead		mg/l	<0.5
		mg/kg	223

[illegible] expressed in [illegible] (ppm) [illegible]
[illegible] mg/kg (ppm) [illegible] ug/kg [illegible]

[illegible]ed by [signature]

State of Florida Certification E84160 and HRS 84308

METHODS: "Standard Methods [illegible] other EPA appr[illegible] [illegible] designated

QUALITY CONTROL: Quality Assurance [illegible]
Quality Assu[illegible]

IES
INTERNATIONAL ENVIRONMENTAL SERVICES, INC.
105 South Alexander St • Plant City, Florida 33566 • (813) 754-2373
Tampa (813) 229-0879 • Miami Office 1-800-537-9875 • FAX (813) 754-3789
Florida Wats 1-800-762-1104

CERTIFIED ANALYSIS

TO: Mr. Garry Allen
International Petroleum Corp
105 S Alexander St
Plant City, FL 33566

PROJECT NO:
SAMPLED BY: T. Malatino
DATE COLLECTED: 08/06/91
DATE COMPLETED: 08/16/91

Source: IPC-FL 13 Drums Composited
Description of Sample: 4,6,7,8,9,10,11,12
18,19,20,23,24
IES Lab ID: 080691-006-IPC-FL Client ID: Soil Composited

EPA METHOD 8020	UNIT mg/kg	
MTBE	<0.5	
Benzene	0.45	
Toluene	50.2	
Chlorobenzene		<0.5
Ethylbenzene		16.3
p,m-xylene	58.7	
o-xylene	30.4	
1,3-Dichlorobenzene	<0.5	
1,4-Dichlorobenzene	<0.5	
1,2-Dichlorobenzene	<0.5	
TCLP Benzene	<0.5	mg/l

Results expressed in ☐ mg/l (ppm) ☐ ug/l (ppb) ☐ mg/kg (ppm) ☐ ug/kg (ppb)

Certified by Don Nelson
Chemist

State of Florida Certification E84160 and HRS 84308

METHODS: "Standard Methods for the Examination [illegible] and Wastewater" [illegible] AWWA and WPCF other EPA approved methods which meet [illegible]

QUALITY CONTR Quality Assurance Project Plan No. 8703[illegible]
Quality Assurance [illegible] Control No. 87[illegible]

INTERNATIONAL ENVIRONMENTAL SERVICES, INC.

IES

105 South Alexander St • Plant City, Florida 33566 • (813) 754 2373
Tampa (813) 229-0879 • Miami Office 1-800-537-0875 • FAX (813) 754-3789
Florida Wats 1-800-762-1104

CERTIFIED ANALYSIS

TO: Mr. Garry Allen
International Petroleum Corp
105 S Alexander St
Plant City, FL 33564

PROJECT NO:
SAMPLED BY: Allen/Oliver
DATE COLLECTED: 08/02/91
DATE COMPLETED: 08/16/91

Source: IPC-FL
Description of Sample: Soil Pile (property)
IES Lab ID: 080291-003-IPC-FL
Client ID: 24K

EPA METHOD 8020	UNIT mg/kg	
MTBE	<0.1	
Benzene	<0.1	
Toluene	<0.1	
Chlorobenzene	<0.1	
Ethylbenzene	<0.1	
p,m-xylene	<0.1	
o-xylene	<0.1	
1,3-Dichlorobenzene	<0.1	
1,4-Dichlorobenzene	<0.1	
1,2-Dichlorobenzene	<0.1	
TCLP Benzene	<0.1	mg/l

Results expressed in ☐ mg/l (ppm) ☐ ug/l (ppb) ☐ mg/kg (ppm) ☐ ug/kg (ppb)

Certified by [signature] Chemist

State of Florida Certification: E84160 and HRS 84308

METHODS: "Standard Methods for the Examination of [illegible] and Wastewater", Latest Edition, APHA, AWWA, and WPCF [illegible] other EPA approved methods [illegible] protocol unless otherwise designated

QUALITY CONTROL: Quality Assurance Project Plan [illegible]
Quality [illegible]

INTERNATIONAL ENVIRONMENTAL SERVICES, INC.
105 South Alexander St • Plant City Florida 33566 • (813) 754 2373
Tampa (813) 229-0879 • Miami Office 1-800-537-9875 • FAX (813) 754-3789
Florida Wats 1-800-762-1104

CERTIFIED ANALYSIS

TO: Mr. Garry Allen
International Petroleum Corp
105 S. Alexander St.
Plant City, FL 33564

PROJECT NO:
SAMPLED BY: T. Malatino
DATE COLLECTED: 08/06/91
DATE COMPLETED: 08/16/91

IES SAMPLE #: 80691-006-IPC
Source: IPC-FL 13 Drum Composite
Description: 4,6,7,8,9,10,11,12,18,19,20,23,24
Client's ID: Soil Composite

METALS:	RESULTS mg/kg	ACCEPTABLE CRITERIA FOR KILN
Arsenic	54.4	55
Barium	155.0	2750
Cadmium	35.0	55
Chromium	57.0	275
Lead	469.6	77
Mercury	<0.5	17
Selenium	<50	165
Silver	2.5	165
TCLP Lead	<0.5 mg/l	
TRPH (EPA 418.1)	4,077 mg/kg	
TOX	186 mg/kg	

Results expressed in ☐ mg/l (ppm) ☐ ug/l (ppb) ☐ mg/kg (ppm) ☐ ug/kg (ppb)

Certified by Don Oliver
Chemist

State of Florida Certification: E84160 and HRS 84308

METHODS: "Standard Methods for the Examination of Water and Wastewater", Latest Edition, APHA, AWWA, and WPCF, and other EPA approved methods which meet CLP protocol, unless otherwise designated.

QUALITY CONTROL: Quality Assurance Project Plan for [illegible]
Quality Assurance Quality Control [illegible]

INTERNATIONAL ENVIRONMENTAL SERVICES, INC.

IES

105 South Alexander St • Plant City Florida 33566 • (813) 754-2373
Tampa (813) 229-0879 • Miami Office 1-800-537-9876 • FAX (813) 754 3789
Florida Wats 1-800-762-1104

CERTIFIED ANALYSIS

TO: Mr. Garry Allen
International Petroleum Corp
105 S. Alexander St.
Plant City, FL 33564

PROJECT NO:
SAMPLED BY: Allen/Oliver
DATE COLLECTED: 08/02/91
DATE COMPLETED: 08/16/91

IES SAMPLE #: 80291-003-IPC
Source: IPC-FL
Description: Soil Pile (Property)
Client's ID: 24K

METALS:	RESULTS mg/kg	ACCEPTABLE CRITERIA [illegible]
Arsenic	<30	55
Barium	152.6	2750
Cadmium	1.5	55
Chromium	17.5	275
Lead	71.0	77
Mercury	<0.2	17
Selenium	78	165
Silver	2.4	165
TRPH (EPA 418.1)	30.3	
TOX	<10	

Results expressed in ☐ mg/l (ppm) ☐ ug/l (ppb) ☐ mg/kg (ppm) ☐ ug/kg (ppb)

Certified by: Don Oliver
Chemist

State of Florida Certification: E84160 and HRS 84308

METHODS: "Standard Methods for the Examination of Water and Wastewater," Latest Edition, APHA, AWWA, and WPCF and other EPA approved methods which meet FDER protocol unless otherwise designated

QUALITY CONTROL: Quality Assurance Project Plan No. 870319G
Quality Assurance Quality Control No. 87319G

IES

INTERNATIONAL ENVIRONMENTAL SERVICES, INC.

105 South Alexander St. • Plant City, Florida 33566 • (813) 754-2373
Tampa (813) 229-0879 • Miami Office 1-800-537-9875 • FAX (813) 754-3789
Florida Wats 1-800-762-1104

CERTIFIED ANALYSIS

TO: CLARK DANTZLER
INTERNATIONAL PETROLEUM CORP.
105 S. ALEXANDER STREET
PLANT CITY, FL 33566

PROJECT NO:
SAMPLED BY: PCWP
DATE COLLECTED: 07/26/91
DATE COMPLETED: 08/01/91

IES SAMPLE #:	072991-030-IPC		
Source:	Effluent		
Description:	Water		
Client's ID:	07/19/91-07/26/91		
Total Nitrogen	14	mg/l	
Total Phosphorus	4	mg/l	
Chloride	128	mg/l	
Chemical Oxygen Demand	9,846	mg/l	
Phenol	[illegible]	mg/l	ID. 3
Oil & Grease	25.3	mg/l	25 3

Results expressed in ☐ mg/l (ppm) ☐ ug/l (ppb) ☐ mg/kg (ppm) ☐ ug/kg (ppb)

Certified by: [signature] Chemist

State of Florida Certification: E84160 and HRS #4308

METHODS: "Standard Methods for the Examination of Water and Wastewater" Latest Edition, APHA, AWWA, and WPCF, other EPA approved methods which meet FDER protocol, unless otherwise designated

QUALITY CONTROL: Quality Assurance Project Plan No. 870319G
Quality Assurance Quality Control No. 870319G

IES

INTERNATIONAL ENVIRONMENTAL SERVICES, INC.

105 South Alexander St. • Plant City, Florida 33566 • (813) 754-2373

Tampa (813) 229-0879 • Miami Office 1-800-537-9875 • FAX (813) 754-3789

Florida Wats 1-800-762-1104

CERTIFIED ANALYSIS

TO: Mr. Garry Allen
International Petroleum Corp
105 S. Alexander St.
Plant City, FL 33564

PROJECT NO:
SAMPLED BY: Allen/Oliver
DATE COLLECTED: 08/[illegible]/91
DATE COMPLETED: 08/[illegible]/91

IES SAMPLE #: 80291-003-IPC
Source: IPC-FL
Description: Soil Pile (Property)
Client's ID: 24K (Drum # 27)

METALS:	RESULTS: mg/kg		ACCEPTABLE CRITERIA: mg/kg
Arsenic	[illegible]		[illegible]
Barium	[illegible]		[illegible]
Cadmium	[illegible]		[illegible]
Chromium	[illegible]		275
Lead	[illegible]	71.0	77
Mercury	[illegible]	<0.2	17
Selenium		78	[illegible]
Silver		2.4	[illegible]

TRPH (EPA 418.1)	30.3	
TOX	<10	

Results expressed in ☐ mg/l (ppm) ☐ ug/l (ppb) ☐ mg/kg (ppm) ☐ ug/kg (ppb)

Compiled by: Don Clark
Chemist

State of Florida Certification: E84160 and HRS 84308

METHODS: "Standard Methods for the Examination of Water and Wastewater" Latest Edition, APHA, AWWA, et [illegible] other EPA approved methods which meet EDER protocol, unless otherwise designated.

QUALITY CONTROL: Quality Assurance Project Plan No. 870319G
Quality Assurance Quality Control No. 870319G

Progress Environmental Laboratories

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

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

To: Malatino & Associates
4415 Florida National Drive, Suite 101
P.O. Box 6630
Lakeland, FL 33807-6630

Report Date: 02/19/93

Attn: Tony Malatino, CHMS

PEL ID # : 504237
Customer ID : Filter Basket Waste
Project ID : IPC-1
Location : I.P.C.; Plant City, FL
Sample Matrix : Soil

Collection Information:
Sample Date: 02/11/93
Sample Time: 1340
Sampled By : J.S.

EPA Method 1311, TCLP REPORT

ND = Less than MDL

Lab#	Parameter	Method	Results	Units	MDL
504237	Mercury	EPA 245.2	ND	mg/l	0.0020
	Arsenic	EPA 6010	0.162	mg/l	0.1000
	Barium	EPA 6010	0.626	mg/l	0.0110
	Cadmium	EPA 6010	0.028	mg/l	0.0040
	Chromium	EPA 6010	0.015	mg/l	0.0090
	Lead	EPA 6010	0.080	mg/l	0.0570
	Selenium	EPA 6010	ND	mg/l	0.1000
	Silver	EPA 6010	ND	mg/l	0.0140
	1,1-Dichloroethene	EPA 8240	ND	mg/l	0.0022
	1,2-Dichloroethane	EPA 8240	ND	mg/l	0.0022
	2-Butanone (MEK)	EPA 8240	ND	mg/l	0.0050
	Benzene	EPA 8240	0.1398	mg/l	0.0019
	Carbon Tetrachloride	EPA 8240	ND	mg/l	0.0062
	Chlorobenzene	EPA 8240	ND	mg/l	0.0020
	Chloroform	EPA 8240	ND	mg/l	0.0023
	Tetrachloroethene	EPA 8240	0.0177	mg/l	0.0020
	Trichloroethene	EPA 8240	ND	mg/l	0.0044
	Vinyl Chloride	EPA 8240	ND	mg/l	0.0026

Respectfully submitted, Vincent M Ciampa
Vincent M. Ciampa, Laboratory Supervisor

Progress Environmental Laboratories

- PROGRESS ENVIRONMENTAL LABORATORIES -
QC REPORT

Test Name	Method	Results	Units	% Rec.	%Diff
504237 Malatino & Associates Filter Basket Waste					
Arsenic	EPA 6010	0.162	mg/l	107.5	
Barium	EPA 6010	0.626	mg/l	97.1	
Cadmium	EPA 6010	0.028	mg/l	99.9	
Chromium	EPA 6010	0.015	mg/l	99.1	
Lead	EPA 6010	0.080	mg/l	96.5	
Selenium	EPA 6010	ND	mg/l	117.5	
Silver	EPA 6010	ND	mg/l	102.5	
Vinyl Chloride	EPA 8240	ND	mg/l	87.9	
1,1-Dichloroethene	EPA 8240	ND	mg/l	93.0	
2-Butanone (MEK)	EPA 8240	ND	mg/l	124.7	
Chloroform	EPA 8240	ND	mg/l	105.3	
1,2-Dichloroethane	EPA 8240	ND	mg/l	96.6	
Carbon Tetrachloride	EPA 8240	ND	mg/l	87.3	
Benzene	EPA 8240	0.1398	mg/l	129.4	
Trichloroethene	EPA 8240	ND	mg/l	99.3	
Tetrachloroethene	EPA 8240	0.0177	mg/l	93.0	
Chlorobenzene	EPA 8240	ND	mg/l	96.8	

Progress Environmental Laboratories

4420 Pendola Point Road
Tampa, Florida 33619
(813) 247-2805
FAX: (813) 246-1537

Table 5 (TCLP Volatiles)
EPA 1311

Maximum Concentration of Contaminants for the Toxicity Characteristic March 1990[1]

EPA HW Number[2]	Contaminant	CAS Number[3]	Final Regulation Level (mg/L)	Analytical Fraction
D043	Vinyl Chloride	75-01-4	0.20	Volatiles
D029	1,1-Dichloroethylene	75-35-4	0.70	Volatiles
D022	Chloroform	67-66-3	6.0	Volatiles
D019	Carbon Tetrachloride	36-23-5	0.50	Volatiles
D028	1,2-Dichloroethane	107-06-2	0.50	Volatiles
D040	Trichloroethylene	79-01-6	0.5	Volatiles
D039	Tetrachloroethylene	127-18-4	0.7	Volatiles
D019	Benzene	71-43-2	0.50	Volatiles
D021	Chlorobenzene	106-90-7	100.0	Volatiles
D035	Methyl ethyl ketone	78-93-3	200.0	Volatiles

*NOTE:

1. EPA Environmental Fact Sheet, "Toxicity Rule Finalized," EPA/530-SW-89-045, March 1990.

2. Hazardous Waste Number.

3. Chemical Abstracts Service Number.

4. If o-, m-, or p-Cresol concentrations cannot be differentiated, the total cresol concentration is used. The regulatory level for total cresol is 200.0 mg/L.

5. Quantitation limit is greater than the calculated regulatory level. The quantitation limit, therefore, becomes the regulatory level.

6. The Agency will propose a new regulatory level for the constituent,based on the latest toxicity information.

Progress Environmental Laboratories

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

Table 1 (TCLP Metals)
EPA Method 1311

Maximum Concentration of Contaminants for the Toxicity Characteristic March 1990[1]

EPA HW Number[2]	Contaminant	CAS Number[3]	Final Regulation Level (mg/L)	Analytical Fraction
D009	Mercury	7439-92-1	0.2	Metals
D011	Silver	7440-22-4	5.0	Metals
D004	Arsenic	7440-38-2	5.0	Metals
D005	Barium	7440-39-3	100.0	Metals
D006	Cadmium	7440-43-9	1.0	Metals
D007	Chromium	1333-82-0	5.0	Metals
D008	Lead	7439-92-1	5.0	Metals
D010	Selenium	7782-49-2	1.0	Metals

*NOTE:

1. EPA Environmental Fact Sheet, "Toxicity Rule Finalized," EPA/530-SW-89-045, March 1990.
2. Hazardous Waste Number.
3. Chemical Abstracts Service Number.
4. If o-, m-, or p-Cresol concentrations cannot be differentiated, the total cresol concentration is used. The regulatory level for total cresol is 200.0 mg/L.
5. Quantitation limit is greater than the calculated regulatory level. The quantitation limit, therefore, becomes the regulatory level.
6. The Agency will propose a new regulatory level for the constituent based on the latest toxicity information.

INTERNATIONAL PETROLEUM CORPORATION

TELECOPIER COVER PAGE

NAME: Jim Clark

COMPANY: Clark Environmental

DATE: 2-23-93 TIME:

SENT BY: Garry Allen

NUMBER OF PAGES (INCLUDING COVER): 5

TELECOPIER NUMBER: (813) 425-4642

NOTES OR COMMENTS:

If you do not receive the entire transmission, please contact:

NAME:

TELEPHONE NO.:

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(813) 754-1504 / (813) 754-3789 FAX #
105 South Alexander Street, Plant City, Florida 33566
Area Code (813) 229-1739 Fla WATS 800-282-9585

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

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

(BDL) Below Laboratory Detection Limits (NR) Not Reported by FDEP (*) Maximum concentration for non–hazard

Environmental Conservation Laboratories
10207 General Drive
[illegible]ando, Florida 32824
[illegible]

ENCO Laboratories
DHRS Certification No. E83182

LIENT : Malatino & Associates
DDRESS: P.O. Box 6630
Lakeland, FL 33807

REPORT # : OR6172
DATE SUBMITTED: January 4, 1997
DATE REPORTED : January 10, 1997

PAGE 1 OF 3

ITENTION: Tony Malatino

SAMPLE IDENTIFICATION

Sample submitted and
identified by client as:

' Midguard-Lake Wales, FL.

01/03/97

#1 - WASTE COOLANT 2:30 P.M.

NON Hazardous

A.M. (Tony) Malatino

MALATINO & ASSOCIATES, INC.
"Specialists in Environmental Testing and Services"
TONY MALATINO, C.H.M.S., C.E.I.
President

4415 Florida National Drive, Suites 101 & 103
Mailing Address: P.O. Box 6630 (941) 646-2828
Lakeland, Florida 33807-6630 Tel. & Fax (941) 648-4285

BORATORY MANAGER David J. Vesey

ENCO LABORATORIES
REPORT # : OR6172
DATE REPORTED: January 10, 1997
PROJECT NAME : Midguard-Lake Wales, FL.

RESULTS OF ANALYSIS

PA METHOD 8010 - CLP VOLATILE HALOCARBONS	WASTE COOLANT	LAB BLANK	Units
richloroethene	100 U D1	1 U	µg/L
etrachloroethene	200 U D1	2 U	µg/L
Surrogate:	% RECOV	% RECOV	LIMITS
Bromofluorobenzene	88	107	45-141
Date Analyzed	01/08/97	01/08/97	

A METHOD 8020 - LP VOLATILE AROMATICS	WASTE COOLANT	LAB BLANK	Units
ene	100 U D1	1 U	µg/L
Surrogate:	% RECOV	% RECOV	LIMITS
Bromofluorobenzene	113	112	65-138
Date Analyzed	01/08/97	01/08/97	

P METALS	METHOD	WASTE COOLANT	LAB BLANK	Units
P Lead	7420	0.50 U	0.10 U	mg/L
e Analyzed		01/10/97	01/10/97	

D Analyte value determined from a 1:100 dilution.
U Compound was analyzed for but not detected to the level shown.

ENCO LABORATORIES
REPORT # : OR6172
DATE REPORTED: January 10, 1997
PROJECT NAME : Midguard-Lake Wales, FL.

QUALITY CONTROL DATA

rameter	% RECOVERY MS/MSD/LCS	ACCEPT LIMITS	% RPD MS/MSD	ACCEPT LIMITS
A Method 8010				
thylene chloride	112/113/106	43-148	<1	29
loroform	110/110/101	61-118	<1	15
rbon Tetrachloride	117/120/107	51-126	2	14
ichloroethene	111/107/100	61-121	4	22
trachloroethene	109/106/108	69-117	3	18
lorobenzene	108/116/102	67-119	7	10
A Method 8020				
nzene	119/114/118	72-134	4	20
luene	109/116/114	72-124	6	19
benzene	109/117/116	67-129	7	21
ene	108/115/117	66-131	6	21
P Metals				
P Lead, 7420	101/101/100	75-115	<1	10

ronmental Conservation Laboratories Comprehensive QA Plan #960038

- = Less Than
- = Matrix Spike
- = Matrix Spike Duplicate
- = Laboratory Control Standard
- = Relative Percent Difference

Environmental Conservation Laboratories
10207 General Drive
Orlando, Florida 32824
[redacted]

ENCO Laboratories
DHRS Certification No. E83182

CLIENT : Malatino & Associates
ADDRESS: P.O. Box 6630
Lakeland, FL 33807

REPORT # : OR6025
DATE SUBMITTED: December 14, 1996
DATE REPORTED : December 20, 1996

ATTENTION: Tony Malatino

SAMPLE IDENTIFICATION

Sample submitted and
identified by client as:

21154 US19N Mazda Village

12/12/96

#1 - WASTE ANTI-FREEZE 4:00

MALATINO & ASSOCIATES, INC.
"Specialists in Environmental Testing and Services"
TONY MALATINO, C.H.M.S., C.E.I.
President
4415 Florida National Drive, Suites 101 & 103
Mailing Address: P.O. Box 6630 (941) 646-2828
Lakeland, Florida 33807-6630 Tel. & Fax (941) 648-4285

NON Hazardous
per A.M. Malatino

ANTHONY M. MALATINO
Environmental Assessment Association
#13110
Certified Environmental Inspector

LABORATORY MANAGER ______________________
David J. Vesey

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

ENCO Laboratories

DHRS Certification No. E83182

CLIENT : Malatino & Associates
ADDRESS: P.O. Box 6630
Lakeland, FL 33807

REPORT # : OR6025
DATE SUBMITTED: December 14, 1996
DATE REPORTED : December 20, 1996

ATTENTION: Tony Malatino

SAMPLE IDENTIFICATION

Sample submitted and
identified by client as:

21154 US19N Mazda Village

12/12/96

#1 - WASTE ANTI-FREEZE 4:00

MALATINO & ASSOCIATES, INC.
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President

4415 Florida National Drive, Suites 101 & 103
Mailing Address: P.O. Box 6630 (941) 646-2828
Lakeland, Florida 33807-6630 Tel. & Fax (941) 648-4285

NON Hazardous
per A.M. Malatino

ANTHONY M. MALATINO #13110 Certified Environmental Professional

ABORATORY MANAGER David J. Vesey
David J. Vesey

ENCO LABORATORIES
REPORT # : OR6025
DATE REPORTED: December 20, 1996
PROJECT NAME : 21154 US19N
Mazda Village

RESULTS OF ANALYSIS

EPA METHOD 8010 - TCLP VOLATILE HALOCARBONS	WASTE ANTI-FREEZE	LAB BLANK	Units
Trichloroethene	200 U D1	1 U	µg/L
Tetrachloroethene	400 U D1	2 U	µg/L
Surrogate:	% RECOV	% RECOV	LIMITS
Bromofluorobenzene	82	89	45-141
Date Analyzed	12/17/96	12/17/96	

EPA METHOD 8020 - TCLP VOLATILE AROMATICS	WASTE ANTI-FREEZE	LAB BLANK	Units
Benzene	200 U D1	1 U	µg/L
Surrogate:	% RECOV	% RECOV	LIMITS
Bromofluorobenzene	92	85	67-222
Date Analyzed	12/17/96	12/17/96	

TCLP METALS	METHOD	WASTE ANTI-FREEZE	LAB BLANK	Units
TCLP Lead	7420	2.28	0.10 U	mg/L
Date Analyzed		12/18/96	12/18/96	

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

ENCO LABORATORIES
REPORT # : OR6025
DATE REPORTED: December 20, 1996
PROJECT NAME : 21154 US19N
Mazda Village

QUALITY CONTROL DATA

Parameter	% RECOVERY MS/MSD/LCS	ACCEPT LIMITS	% RPD MS/MSD	ACCEPT LIMITS
EPA Method 8010				
Methylene chloride	98/ 99/ 84	43-148	1	29
Chloroform	104/102/ 94	61-118	2	15
Carbon Tetrachloride	111/105/ 88	51-126	6	14
Trichloroethene	101/105/ 92	61-121	4	22
Tetrachloroethene	118/106/ 92	69-117	11	18
Chlorobenzene	108/111/ 95	67-119	3	10
EPA Method 8020				
[illegible]nzene	114/117/102	72-134	2	20
[illegible]luene	103/107/100	72-124	4	19
Ethylbenzene	103/107/ 95	67-129	4	21
O-Xylene	105/118/ 93	66-131	12	21
TCLP Metals				
TCLP Lead, 7420	91/ 97/ 99	75-115	6	10

Environmental Conservation Laboratories Comprehensive QA Plan #960038

< = Less Than
MS = Matrix Spike
MSD = Matrix Spike Duplicate
LCS = Laboratory Control Standard
RPD = Relative Percent Difference

QSARF #

ENVIRONMENTAL CONSERVATION LABORATORIES

4810 Executive Park Court, Suite 211
Jacksonville, Florida 32216-6069
Ph. (904) 296-3007 · Fax (904) 296-6210

10207 General Drive
Orlando, Florida 32824
Ph. (407) 826-5314 · Fax (407) 850-6945

CHAIN OF CUSTODY RECORD

21154 US 19 N

PROJECT REFERENCE	PROJECT NO.	P.O. NUMBER
MAZDa Village		

PROJECT LOC. (State)	SAMPLER(s) NAME	PHONE / FAX
	A. M. Malatino (signature)	

CLIENT NAME	CLIENT PROJECT MANAGER
MALATINO	

CLIENT ADDRESS (CITY, STATE, ZIP): P.O. Box 6636, Lkld, FL

MATRIX TYPE: SURFACE WATER / GROUND WATER / WASTEWATER / DRINKING WATER / SOIL/SOLID/SEDIMENT / NONAQUEOUS LIQUID (oil, solvent, etc.) / AIR / SLUDGE / OTHER

REQUIRED ANALYSIS: TCLP R6 / TCLP (3) ORG

PRESERVATIVE — NUMBER OF CONTAINERS SUBMITTED

PAGE ___ OF ___

☐ STANDARD REPORT DELIVERY
☐ EXPEDITED REPORT DELIVERY (surcharge)

Date Due: ___

STATION	DATE	TIME	GRAB	COMP	SAMPLE IDENTIFICATION	REMARKS
	12/12 1996	4:00	X		Waste Antifreeze	

SAMPLE KIT PREPARED BY: ☐JACKSONVILLE ☐ORLANDO	DATE	TIME	RELINQUISHED BY: (SIGNATURE)	DATE	TIME	RECEIVED BY: (SIGNATURE)	DATE	TIME
			Anthony Malatino (signature)	12/13/96	9:17 am ~~0805~~			

RELINQUISHED BY: (SIGNATURE)	DATE	TIME	RECEIVED BY: (SIGNATURE)	DATE	TIME	RELINQUISHED BY: (SIGNATURE)	DATE	TIME
			[illegible signature]	12-13-96	9:27 am			

RECEIVED BY (SIGNATURE)	DATE	TIME	RELINQUISHED BY: (SIGNATURE)	DATE	TIME	RECEIVED BY: (SIGNATURE)	DATE	TIME

RECEIVED FOR LABORATORY BY: (SIGNATURE)	DATE	TIME	CUSTODY INTACT	ENCO LOG NO.	REMARKS
Kevin [illegible] (signature) ☐ Jacksonville ☒ Orlando	12/16/96	7:30 AM	☐ YES ☐ NO	OR600	

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

ENCO
Laboratories
DHRS Certification No. E83182

CLIENT : Malatino & Associates
ADDRESS: P.O. Box 6630
Lakeland, FL 33807

REPORT # : OR6238
DATE SUBMITTED: January 10, 1997
DATE REPORTED : January 20, 1997

ATTENTION: Tony Malatino

SAMPLE IDENTIFICATION

Sample submitted and
identified by client as:

Ewell Ind., Inc.
Largo, FL
01/08/97

#1 - WASTE ANTI-FREEZE

NON-Hazardous
A. M. Malatino, CHMS

MALATINO & ASSOCIATES, INC.
"Specialists in Environmental Testing and Services"
TONY MALATINO, C.H.M.S., C.E.I.
President

4415 Florida National Drive, Suites 101 & 103
Mailing Address: P.O. Box 6630 (941) 646-2828
Lakeland, Florida 33807-6630 Tel. & Fax (941) 648-4285

LABORATORY MANAGER David J. Vesey
David J. Vesey

ENCO LABORATORIES
REPORT # : OR6238
DATE REPORTED: January 20, 1997
PROJECT NAME : Ewell Ind., Inc.
Largo, FL

RESULTS OF ANALYSIS

EPA METHOD 8010 - TCLP VOLATILE HALOCARBONS	WASTE ANTI-FREEZE	LAB BLANK	Units
Trichloroethene	100 U D1	1 U	µg/L
Tetrachloroethene	**400 D1**	2 U	µg/L
Surrogate:	**% RECOV**	**% RECOV**	**LIMITS**
Bromofluorobenzene	93	106	45-141
Date Analyzed	01/17/97	01/16/97	

EPA METHOD 8020 - TCLP VOLATILE AROMATICS	WASTE ANTI-FREEZE	LAB BLANK	Units
Benzene	100 U D1	1 U	µg/L
Surrogate:	**% RECOV**	**% RECOV**	**LIMITS**
Bromofluorobenzene	115	111	65-138
Date Analyzed	01/17/97	01/16/97	

TCLP METALS	METHOD	WASTE ANTI-FREEZE	LAB BLANK	Units
TCLP Lead	7420	**0.93**	0.10 U	mg/L
Date Analyzed		01/16/97	01/16/97	

D1 = Analyte value determined from a 1:100 dilution.
U = Compound was analyzed for but not detected to the level shown.

ENCO LABORATORIES
REPORT # : OR6238
DATE REPORTED: January 20, 1997
PROJECT NAME : Ewell Ind., Inc.
Largo, FL

QUALITY CONTROL DATA

Parameter	% RECOVERY MS/MSD/LCS	ACCEPT LIMITS	% RPD MS/MSD	ACCEPT LIMITS
EPA Method 8010				
Methylene Chloride	103/111/106	66-137	7	25
Chloroform	104/106/ 98	61-131	2	24
Carbon Tetrachloride	116/125/114	65-130	7	26
Trichloroethene	102/102/ 98	55-139	<1	26
Tetrachloroethene	107/103/ 92	60-135	4	23
Chlorobenzene	106/101/ 97	68-123	5	22
EPA Method 8020				
Benzene	106/106/111	72-134	<1	20
Toluene	111/106/107	72-124	5	19
Ethylbenzene	114/111/109	67-129	3	21
o-Xylene	113/104/110	66-131	8	21
TCLP Metals				
Lead, 7420	90/ 90/100	75-115	<1	10

Environmental Conservation Laboratories Comprehensive QA Plan #960038

< = Less Than
MS = Matrix Spike
MSD = Matrix Spike Duplicate
LCS = Laboratory Control Standard
RPD = Relative Percent Difference

QSARF #______

ENVIRONMENTAL CONSERVATION LABORATORIES

ENCO

4810 Executive Park Court, Suite 211
Jacksonville, Florida 32216-6069
Ph. (904) 296-3007 • Fax (904) 296-6210

10207 General Drive
Orlando, Florida 32824
Ph. (407) 826-5314 • Fax (407) 850-6945

CHAIN OF CUSTODY RECORD

PROJECT REFERENCE	PROJECT NO.	P.O. NUMBER	MATRIX TYPE	REQUIRED ANALYSIS	PAGE	OF
EWELL Ind. Inc Largo, FL				TCLP-RA; TCLP-3 ...		

PROJECT LOC. (State)	SAMPLER(s) NAME	PHONE	FAX
FL	Anthony M. Malatino		

CLIENT NAME	CLIENT PROJECT MANAGER

CLIENT ADDRESS (CITY, STATE, ZIP):

☐ STANDARD REPORT DELIVERY
☐ EXPEDITED REPORT DELIVERY (surcharge)
Date Due: ______

STATION	DATE	TIME	GRAB	COMP	SAMPLE IDENTIFICATION	SURFACE WATER	GROUND WATER	WASTEWATER	DRINKING WATER	SOIL/SOLID/SEDIMENT	NONAQUEOUS LIQUID (oil, solvent, etc.)	AIR	SLUDGE	OTHER	TCLP-RA	TCLP-3							REMARKS
	1-9-97		X		Drum of Waste Paint Free			X							X	X							

PRESERVATIVE / NUMBER OF CONTAINERS SUBMITTED

SAMPLE KIT PREPARED BY: ☐JACKSONVILLE ☐ORLANDO	DATE	TIME	RELINQUISHED BY: (SIGNATURE)	DATE	TIME	RECEIVED BY: (SIGNATURE)	DATE	TIME
			Anthony M. Malatino	1-9-97		Craig Scaff		
RELINQUISHED BY: (SIGNATURE)	DATE	TIME	RECEIVED BY: (SIGNATURE)	DATE	TIME	RELINQUISHED BY: (SIGNATURE)	DATE	TIME
RECEIVED BY (SIGNATURE)	DATE	TIME	RELINQUISHED BY: (SIGNATURE)	DATE	TIME	RECEIVED BY: (SIGNATURE)	DATE	TIME

RECEIVED FOR LABORATORY BY: (SIGNATURE)	DATE	TIME	CUSTODY INTACT	ENCO LOG NO.	REMARKS
Kevin Sutherland ☐ Jacksonv ☒ Orlando	1/10/97	9:50AM	☒ YES ☐ NO	ORG 3	

FDEP	3804 Coconut Palm Drive, Tampa, FL 33619-8318

FAX

Date: Oct 20, 1997

Number of pages including cover sheet: 2

To:
TONY MALATINO
MALATINO & ASSOC.

Phone:

Fax phone: (941) 648-4285

CC:

From:
Jim Dregne
HAZ. WASTE

Phone: (813) 744-6100 x 379

Fax phone: (813) 744-6125

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

REF: IPC TF PICK-UP

Tony:

I need copies of the computer printouts for pick-ups for Antifreeze for the following businesses. They were not with the others that you provided for me:

DBA Keystone Plaza Firestone
Florida Clark (ifl
Pelican Motors
P+M Automotive
Polk Co. School
Lokey Motors
New Port Lincoln Mercury
Moody Truck Center.

Thanks
Jim Dregne

Transmit Confirmation Report

No.	:	004
Receiver	:	819416484285
Transmitter	:	WASTE MGT TAMPA SWDIST
Date	:	Oct 20 97 10:07
Time	:	01'11
Mode	:	Norm
Pages	:	02
Result	:	OK

CEI

FASCIMILE TRANSMITTAL

DATE: 11-17-97

Number of pages including cover sheet: 12

To:
Jim Dreggna
D.E.P.
Requested Manifests
Phone: 744-6100
Fax: 744-6125
CC:

From:
Jim Clark
Phone: (941) 425-4884
Fax: (941) 425-4642
CC:

Remarks: ☐ Urgent ☒ For Your Review ☐ Reply ASAP ☐ Please Comment

If you have any questions please call.

If you do not receive any part of this transmission, please call (941) 425-4884.

Clark Environmental, Inc.
755 Prairie Industrial Parkway • Mulberry, Florida 33860 • 941-425-4884 • Fax: 941-425-4642

NON-HAZARDOUS WASTE MANIFEST

1. Generator's US EPA ID No. N/A
Manifest Document No. N/A
2. Page 1 of 1

GENERATOR

3. Generator's Name and Mailing Address
INTERNATIONAL PETROLEUM CORPORATION
105 SOUTH ALEXANDER STREET
PLANT CITY, FL 33567
4. Generator's Phone (813) 754-1504

5. Transporter 1 Company Name
CLARK ENVIRONMENTAL
6. US EPA ID Number N/A

7. Transporter 2 Company Name
8. US EPA ID Number N/A

9. Designated Facility Name and Site Address
CLARK ENVIRONMENTAL, INC.
755 PRAIRE INDUSTRIAL PARKWAY
MULBERRY, FL 33860
10. US EPA ID Number N/A

A. Transporter's Phone 941-425-6886
B. Transporter's Phone
C. Facility's Phone 941-425-6886

11. Waste Shipping Name and Description	12. Containers No.	Type	13. Total Quantity	14. Unit Wt/Vol
a. INDUSTRIAL WASTE NON-REGULATED	001	TT	3200	G
b. Pan - 58440				
c. Tax - 33120				
d. Apt 25320				

D. Additional Descriptions for Materials Listed Above
A) 142-BC01 (SOIL/SAND) SLUDGE Load #1

E. Handling Codes for Wastes Listed Above

15. Special Handling Instructions and Additional Information
CONTACT: GARRY ALLEN-ON SITE

16. GENERATOR'S CERTIFICATION: I certify the materials described above on this manifest are not subject to federal regulations for reporting proper disposal of Hazardous Waste.
Printed/Typed Name Mark Graziano
Signature Mark Graziano
Month 11 Day 10 Year 97

TRANSPORTER

17. Transporter 1 Acknowledgement of Receipt of Materials
Printed/Typed Name
Signature
Month Day Year

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 waste materials covered by this manifest except as noted in Item 19.
Printed/Typed Name
Signature
Month 11 Day 11 Year 97

T/S/D/F COPY

NON-HAZARDOUS WASTE MANIFEST

1. Generator's US EPA ID No. N/A
Manifest Document No. N/A
2. Page 1 of 1

GENERATOR

3. Generator's Name and Mailing Address
INTERNATIONAL PETROLEUM CORPORATION
105 SOUTH ALEXANDER STREET
PLANT CITY, FL 33566
4. Generator's Phone (813) 754-1504

5. Transporter 1 Company Name: SWS
6. US EPA ID Number: N/A

7. Transporter 2 Company Name:
8. US EPA ID Number: N/AA

9. Designated Facility Name and Site Address
Clark Environmental Inc
755 N. Prairie Ind Pkwy
Mulberry, Fla 33860
10. US EPA ID Number: N/A

A. Transporter's Phone
B. Transporter's Phone
C. Facility's Phone

11. Waste Shipping Name and Description	12. Containers No.	Type	13. Total Quantity	14. Unit Wt/Vol
a. INDUSTRIAL WASTE NON-REGULATED	001	TT	22520	WT
b.				
c.				
d.				

D. Additional Descriptions for Materials Listed Above
A) 142-BC01 (SOIL/SAND) #2
SLUDGE

E. Handling Codes for Wastes Listed Above

15. Special Handling Instructions and Additional Information
CONTACT: % CARRY ALLEN-ONSITE

16. GENERATOR'S CERTIFICATION: I certify the materials described above on this manifest are not subject to federal regulations for reporting proper disposal of Hazardous Waste.

Printed/Typed Name	Signature	Month	Day	Year
Mark Giaquinto	Mark Giaquinto	03	11	97

TRANSPORTER

17. Transporter 1 Acknowledgement of Receipt of Materials

Printed/Typed Name	Signature	Month	Day	Year
Walter McCorkle		03	11	97

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 waste materials covered by this manifest except as noted in Item 19.

Printed/Typed Name	Signature	Month	Day	Year
Tim Clark		3	11	97

COPY

NON-HAZARDOUS WASTE MANIFEST

1. Generator's US EPA ID No. N/A
Manifest Document No. N/A
2. Page 1 of 1

3. Generator's Name and Mailing Address
INTERNATIONAL PETROLEUM CORPORATION
105 SOUTH ALEXANDER STREET
PLANT CITY, FL 33566

4. Generator's Phone (813) 754-1504

5. Transporter 1 Company Name: A & A COASTAL
6. US EPA ID Number: N/A

7. Transporter 2 Company Name
8. US EPA ID Number: N/A

9. Designated Facility Name and Site Address: ~~A & A COASTAL~~ Clark Environmental Inc
795 N. Prairie Ind Pkwy
Mulberry Fla
10. US EPA ID Number: N/A

A. Transporter's Phone
B. Transporter's Phone
C. Facility's Phone

11. Waste Shipping Name and Description	12. Containers No.	Type	13. Total Quantity	14. Unit Wt/Vol
a. INDUSTRIAL WASTE NON-REGULATED	001	TT	25920	WT
b.				
c.				
d.				

D. Additional Descriptions for Materials Listed Above
A) 142-BC01 (SOIL/SAND) SLUDGE #3

E. Handling Codes for Wastes Listed Above

15. Special Handling Instructions and Additional Information
CONTACT: GARRY ALLEN - ON SITE

Gross: 58450
Tare: 32560
Net: 25720

16. GENERATOR'S CERTIFICATION: I certify the materials described above on this manifest are not subject to federal regulations for reporting proper disposal of Hazardous Waste.

Printed/Typed Name	Signature	Month	Day	Year
MARK BIAGUINTO	Mark Biaguinto	11	11	97

17. Transporter 1 Acknowledgement of Receipt of Materials

Printed/Typed Name	Signature	Month	Day	Year
VICTOR LOVETT		11	11	97

18. Transporter 2 Acknowledgement of Receipt of Materials

Printed/Typed Name	Signature	Month	Day	Year

19. Discrepancy Indication Space

20. Facility Owner or Operator: Certification of receipt of waste materials covered by this manifest except as noted in Item 19.

Printed/Typed Name	Signature	Month	Day	Year
Jim Clark		11	11	97

GENERATOR
TRANSPORTER
FACILITY

COPY

NON-HAZARDOUS WASTE MANIFEST

1. Generator's US EPA ID No.	Manifest Document No.	2. Page 1 of 1
N/A	N/A	

GENERATOR

3. Generator's Name and Mailing Address
INTERNATIONAL PETROLEUM CORPORATION
105 SOUTH ALEXANDER STREET PLANT CITY, FL 33566

4. Generator's Phone (813) 754-1304

5. Transporter 1 Company Name	6. US EPA ID Number
A & A COASTAL	N/A
7. Transporter 2 Company Name	8. US EPA ID Number
	N/A
9. Designated Facility Name and Site Address	10. US EPA ID Number
A & A COASTAL	N/A

A. Transporter's Phone
B. Transporter's Phone
C. Facility's Phone

11. Waste Shipping Name and Description	12. Containers No.	12. Containers Type	13. Total Quantity	14. Unit Wt/Vol
a. INDUSTRIAL WASTE NON-REGULATED	001	TT	27.00	NT
b. Gross: 53.00				
c. Tare: 32.30				
d. Net:				

D. Additional Descriptions for Materials Listed Above
A) 142-BC01 (SOIL/SAND) SLUDGE #1

E. Handling Codes for Wastes Listed Above

15. Special Handling Instructions and Additional Information
CONTACT % GARRY ALLEN - ON SITE

16. GENERATOR'S CERTIFICATION: I certify the materials described above on this manifest are not subject to federal regulations for reporting proper disposal of Hazardous Waste.

Printed/Typed Name	Signature	Month	Day	Year
Mark LaQuinto	Mark LaQuinto	11	14	97

TRANSPORTER

17. Transporter 1 Acknowledgement of Receipt of Materials

Printed/Typed Name	Signature	Month	Day	Year
[illegible]	[illegible]	11	17	97

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 waste materials covered by this manifest except as noted in Item 19.

Printed/Typed Name	Signature	Month	Day	Year
Jim Clark	[signature]	11	17	97

T/S/D/F COPY

NON-HAZARDOUS WASTE MANIFEST

1. Generator's US EPA ID No. N/A
Manifest Document No. N/A
2. Page 1 of 1

3. Generator's Name and Mailing Address
INTERNATIONAL PETROLEUM CORPORATION
105 SOUTH ALEXANDER STREET PLANT CITY, FL 33566
4. Generator's Phone (813) 754-1504

5. Transporter 1 Company Name: SWS
6. US EPA ID Number: N/A

7. Transporter 2 Company Name:
8. US EPA ID Number: N/A

9. Designated Facility Name and Site Address: SWS
10. US EPA ID Number: N/A

A. Transporter's Phone
B. Transporter's Phone
C. Facility's Phone

11. Waste Shipping Name and Description	12. Containers No.	Type	13. Total Quantity	14. Unit Wt/Vol
a. INDUSTRIAL WASTE NON-REGULATED	001	TT	18700	WT
b. Gross: 40820				
c. Tare: 22120				
d. Net: 18700				

D. Additional Descriptions for Materials Listed Above
A) 142-BC01 (SOIL/SAND) SLUDGE

E. Handling Codes for Wastes Listed Above

15. Special Handling Instructions and Additional Information
CONTACT GARRY ALLEN - ON SITE

16. GENERATOR'S CERTIFICATION: I certify the materials described above on this manifest are not subject to federal regulations for reporting proper disposal of Hazardous Waste.

Printed/Typed Name: Mark Biaquinto
Signature: Mark Biaquinto
Month Day Year: 03 11 97

17. Transporter 1 Acknowledgement of Receipt of Materials
Printed/Typed Name: [illegible]
Signature: [illegible]
Month Day Year: 3 11 97

18. Transporter 2 Acknowledgement of Receipt of Materials
Printed/Typed Name
Signature
Month Day Year

19. Discrepancy Indication Space: Material Sent to CEF

20. Facility Owner or Operator: Certification of receipt of waste materials covered by this manifest except as noted in Item 19.
Printed/Typed Name: Barbara Davis
Signature: Barbara Davis
Month Day Year: 03 11 97

GENERATOR'S COPY

NON-HAZARDOUS WASTE MANIFEST

1. Generator's US EPA ID No.: N/A
Manifest Document No.: N/A
2. Page 1 of 1

3. Generator's Name and Mailing Address
INTERNATIONAL PETROLEUM CORPORATION
105 SOUTH ALEXANDER STREET, PLANT CITY, FLORIDA 33566
4. Generator's Phone (813-754-1504

5. Transporter 1 Company Name: CLARK ENVIRONMENTAL, INC.
6. US EPA ID Number: N/A

7. Transporter 2 Company Name:
8. US EPA ID Number: N/A

9. Designated Facility Name and Site Address
CLARK ENVIRONMENTAL, INC
755 PRAIRIE INDUSTRIAL PARKWAY
MULBERRY, FL 33860
10. US EPA ID Number: N/A

A. Transporter's Phone: 813 425-4084
B. Transporter's Phone:
C. Facility's Phone: 941-425-4884

11. Waste Shipping Name and Description	12. Containers No.	Type	13. Total Quantity	14. Unit Wt/Vol
a. INDUSTRIAL WASTE NON-REGULATED	001	TT	13380	G
b.			Net Tons	
c.				
d.				

D. Additional Descriptions for Materials Listed Above
a) 142-BC01 (SLUDGE)

E. Handling Codes for Wastes Listed Above

15. Special Handling Instructions and Additional Information
CONTACT: GARY ALLEN - ON SITE
LOAD #1

16. GENERATOR'S CERTIFICATION: I certify the materials described above on this manifest are not subject to federal regulations for reporting proper disposal of Hazardous Waste.
Printed/Typed Name: Dee McKies
Signature: Dee McKies
Month 3 Day 14 Year 97

17. Transporter 1 Acknowledgement of Receipt of Materials
Printed/Typed Name: Steve Fuller
Signature:
Month 03 Day 14 Year 97

18. Transporter 2 Acknowledgement of Receipt of Materials
Printed/Typed Name:
Signature:
Month Day Year

19. Discrepancy Indication Space

20. Facility Owner or Operator: Certification of receipt of waste materials covered by this manifest except as noted in Item 19
Printed/Typed Name: Jim Clark
Signature:
Month 3 Day 14 Year 97

GENERATOR
TRANSPORTER
FACILITY

T/S/D/F COPY

NON-HAZARDOUS WASTE MANIFEST

1. Generator's US EPA ID No.: N/A
Manifest Document No.: N/A
2. Page 1 of 1

GENERATOR

3. Generator's Name and Mailing Address
INTERNATIONAL PETROLEUM CORPORATION
105 SOUTH ALEXANDER STREET, PLANT CITY, FLORIDA 33566
4. Generator's Phone (813-754-1504

5. Transporter 1 Company Name: INTERNATIONAL PETROLEUM CORP.
6. US EPA ID Number: N/A

7. Transporter 2 Company Name:
8. US EPA ID Number: N/A

9. Designated Facility Name and Site Address
CLARK ENVIRONMENTAL, INC
755 PRAIRIE INDUSTRIAL PARKWAY
MULBERRY, FL 33860
10. US EPA ID Number: N/A

A. Transporter's Phone 813 754-1504
B. Transporter's Phone
C. Facility's Phone 941-425-4884

11. Waste Shipping Name and Description	12. Containers No.	Type	13. Total Quantity	14. Unit Wt/Vol
a. INDUSTRIAL WASTE NON-REGULATED	001	TT		G
b.				
c.				
d.				

D. Additional Descriptions for Materials Listed Above
a) 142-BC01 (SOIL/SAND) Sludge Load #2

E. Handling Codes for Wastes Listed Above

15. Special Handling Instructions and Additional Information
CONTACT: GARY ALLEN - ON SITE

16. GENERATOR'S CERTIFICATION: I certify the materials described above on this manifest are not subject to federal regulations for reporting proper disposal of Hazardous Waste.
Printed/Typed Name: Mark Giaquinto
Signature: Mark Giaquinto
Month 03 Day 14 Year 97

TRANSPORTER

17. Transporter 1 Acknowledgement of Receipt of Materials
Printed/Typed Name: Hector
Signature:
Month 3 Day 14 Year 97

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 waste materials covered by this manifest except as noted in Item 19.
Printed/Typed Name: Jim Clark
Signature:
Month Day Year

T/S/D/F COPY

NON-HAZARDOUS WASTE MANIFEST

1. Generator's US EPA ID No.	Manifest Document No.	2. Page 1 of 1
N/A	N/A	

3. Generator's Name and Mailing Address
INTERNATIONAL PETROLEUM CORPORATION
105 SOUTH ALEXANDER STREET, PLANT CITY, FLORIDA 33566

4. Generator's Phone (813-754-1504

5. Transporter 1 Company Name	6. US EPA ID Number
INTERNATIONAL PETROLEUM CORP.	N/A
7. Transporter 2 Company Name	8. US EPA ID Number
	N/A

9. Designated Facility Name and Site Address	10. US EPA ID Number
CLARK ENVIRONMENTAL, INC 7755 PRAIRIE INDUSTRIAL PARKWAY MILLBERRY, FL 32860	N/A

A. Transporter's Phone 813 754-1504
B. Transporter's Phone
C. Facility's Phone 941-425-4884

11. Waste Shipping Name and Description	12. Containers No.	Type	13. Total Quantity	14. Unit Wt/Vol
a. INDUSTRIAL WASTE NON-REGULATED	001	TT		G
b.				
c.				
d.				

D. Additional Descriptions for Materials Listed Above
a) 142-BC01 (SOIL/SAND) Sludge Load #3

E. Handling Codes for Wastes Listed Above

15. Special Handling Instructions and Additional Information
CONTACT: GARY ALLEN - ON SITE

16. GENERATOR'S CERTIFICATION: I certify the materials described above on this manifest are not subject to federal regulations for reporting proper disposal of Hazardous Waste.

Printed/Typed Name	Signature	Month	Day	Year
Judy Cordero	Judy Cordero	3	14	97

17. Transporter 1 Acknowledgement of Receipt of Materials

Printed/Typed Name	Signature	Month	Day	Year

18. Transporter 2 Acknowledgement of Receipt of Materials

Printed/Typed Name	Signature	Month	Day	Year

19. Discrepancy Indication Space

20. Facility Owner or Operator: Certification of receipt of waste materials covered by this manifest except as noted in Item 19.

Printed/Typed Name	Signature	Month	Day	Year
Tim Clark		03	14	97

GENERATOR
TRANSPORTER
FACILITY

T/S/D/F COPY

NON-HAZARDOUS WASTE MANIFEST

1. Generator's US EPA ID No.: N/A
Manifest Document No.: N/A
2. Page 1 of 1

GENERATOR

3. Generator's Name and Mailing Address
INTERNATIONAL PETROLEUM CORPORATION
105 SOUTH ALEXANDER STREET, PLANT CITY, FLORIDA 33566

4. Generator's Phone: 813-754-1594

5. Transporter 1 Company Name: CLARK ENVIRONMENTAL, INC.
6. US EPA ID Number: N/A

7. Transporter 2 Company Name:
8. US EPA ID Number: N/A

9. Designated Facility Name and Site Address
CLARK ENVIRONMENTAL, INC
755 PRAIRIE INDUSTRIAL PARKWAY
MULBERRY, FL 33860

10. US EPA ID Number: N/A

A. Transporter's Phone: 813 425-4884
B. Transporter's Phone:
C. Facility's Phone: 941-425-4884

11. Waste Shipping Name and Description	12. Containers No.	Type	13. Total Quantity	14. Unit Wt/Vol
a. INDUSTRIAL WASTE NON-REGULATED	001	TT	30000	G
b.				
c.				
d.				

D. Additional Descriptions for Materials Listed Above
a) 142-BC01 (SLUDGE)

E. Handling Codes for Wastes Listed Above

15. Special Handling Instructions and Additional Information
CONTACT: GARY ALLEN - ON SITE

16. GENERATOR'S CERTIFICATION: I certify the materials described above on this manifest are not subject to federal regulations for reporting proper disposal of Hazardous Waste.

Printed/Typed Name: Judy Caldero
Signature: Judy Caldero
Month: 3 Day: 14 Year: 97

TRANSPORTER

17. Transporter 1 Acknowledgement of Receipt of Materials
Printed/Typed Name:
Signature:
Month: Day: Year:

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 waste materials covered by this manifest except as noted in Item 19.
Printed/Typed Name: Jim Clark
Signature:
Month: 03 Day: 14 Year: 97

T/S/D/F COPY

NON-HAZARDOUS WASTE MANIFEST

1. Generator's US EPA ID No.: N/A
Manifest Document No.: N/A
2. Page 1 of 1

3. Generator's Name and Mailing Address
INTERNATIONAL PETROLEUM CORPORATION
105 SOUTH ALEXANDER STREET, PLANT CITY, FLORIDA 33566
4. Generator's Phone (813-754-1594

5. Transporter 1 Company Name: CLARK ENVIRONMENTAL, INC.
6. US EPA ID Number: N/A

7. Transporter 2 Company Name:
8. US EPA ID Number: N/A

9. Designated Facility Name and Site Address
CLARK ENVIRONMENTAL, INC
755 PRAIRIE INDUSTRIAL PARKWAY
MULBERRY, FL 33860
10. US EPA ID Number: N/A

A. Transporter's Phone: 813 425-4884
B. Transporter's Phone:
C. Facility's Phone: 941-425-4884

11. Waste Shipping Name and Description	12. Containers No.	Type	13. Total Quantity	14. Unit Wt/Vol
a. INDUSTRIAL WASTE NON-REGULATED	001	TT		G
b.				
c.				
d.				

D. Additional Descriptions for Materials Listed Above
a) 142-BC01 (SLUDGE)

E. Handling Codes for Wastes Listed Above

15. Special Handling Instructions and Additional Information
CONTACT: BARY ALLEN - ON SITE

16. GENERATOR'S CERTIFICATION: I certify the materials described above on this manifest are not subject to federal regulations for reporting proper disposal of Hazardo
Printed/Typed Name: Judy Ulrich
Signature: Judy Ulrich
Month: 3 Day: 19 Year:

17. Transporter 1 Acknowledgement of Receipt of Materials
Printed/Typed Name:
Signature:
Month: Day: Year:

18. Transporter 2 Acknowledgement of Receipt of Materials
Printed/Typed Name:
Signature:
Month: Day: Year:

19. Discrepancy Indication Space

20. Facility Owner or Operator: Certification of receipt of waste materials covered by this manifest except as noted in Item 19.
Printed/Typed Name: Tim Clark
Signature:
Month: 3 Day: 19 Year: 9

GENERATOR
TRANSPORTER
FACILITY

T/S/D/F COPY

NON-HAZARDOUS WASTE MANIFEST

1. Generator's US EPA ID No. N/A | Manifest Document No. N/A | 2. Page 1 of 1

3. Generator's Name and Mailing Address
INTERNATIONAL PETROLEUM CORPORATION
105 S. ALEXANDER STREET PLANT CITY, FL 33566

4. Generator's Phone (813) 754-1304

5. Transporter 1 Company Name: A.C.T. | 6. US EPA ID Number: N/A

7. Transporter 2 Company Name | 8. US EPA ID Number: N/A

9. Designated Facility Name and Site Address: A.C.T. [illegible] | 10. US EPA ID Number: N/A

A. Transporter's Phone
B. Transporter's Phone
C. Facility's Phone

11. Waste Shipping Name and Description	12. Containers No.	Type	13. Total Quantity	14. Unit Wt/Vol
a. INDUSTRIAL WASTE NON-REGULATED	001	TT	3,740	WT
b. Cons. 32,720				
c. Tare 32,180				
d. Net. 3,740				

D. Additional Descriptions for Materials Listed Above
A) 142-8001 (SOIL/SAND) SLUDGE

E. Handling Codes for Wastes Listed Above

15. Special Handling Instructions and Additional Information
CONTACT: CARRY ALLEN - ON SITE

16. GENERATOR'S CERTIFICATION: I certify the materials described above on this manifest are not subject to federal regulations for reporting proper disposal of Hazardous Waste.

Printed/Typed Name	Signature	Month	Day	Year
MARC GAGNIARD	[signature]	11	17	97

17. Transporter 1 Acknowledgement of Receipt of Materials

Printed/Typed Name	Signature	Month	Day	Year
[illegible]	[signature]	11	17	97

18. Transporter 2 Acknowledgement of Receipt of Materials

Printed/Typed Name	Signature	Month	Day	Year

19. Discrepancy Indication Space

20. Facility Owner or Operator: Certification of receipt of waste materials covered by this manifest except as noted in Item 19.

Printed/Typed Name	Signature	Month	Day	Year
[illegible]	[signature]	11	17	97

GENERATOR — TRANSPORTER — FACILITY

Florida Department of

Memorandum **Environmental Protection**

ENFORCEMENT/COMPLIANCE COVER MEMO

TO: 11/19/97
☒ Richard Garrity, Ph.D., Director of District Management
☐ William Kutash, Environmental Administrator
☐ Office of General Counsel, ATTN:_____

FROM/THROUGH: William Kutash, Environmental Administrator
SCT Stanley Tam, Professional Engineer II
Elizabeth Knauss, Environmental Manager
Jim Dregne, Environmental Specialist II

DATE: November 17, 1997

FILE NAME: **INTERNATIONAL PETROLEUM CORPORATION** PROJECT #:187521

PROGRAM: Hazardous Waste COUNTY: Hillsborough

TYPE OF DOCUMENT:

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

DESCRIPTION OF VIOLATIONS: IPC generates, transports, markets and processes used oil and generates and transports used oil filters. IPC also handled used antifreeze from some of its clients. Some of the antifreeze was determined to be a hazardous waste, but was transported, stored and treated by IPC. The company did not notify the state of these hazardous waste activities. The storage tank used to store the hazardous waste antifreeze was not certified to store hazardous waste. The company also generated solid waste that did not have a waste determination. The handling of solid waste without a waste determination was a recurring violation.

SUMMARY OF CORRECTIVE ACTIONS: The facility must comply with hazardous waste rules and enter into a consent order and pay a penalty.

PENALTY SUMMARY:

Potential for Harm: Major Extent of Deviation: Major

Penalty Amount: Pending Expenses: Pending

TOTAL PENALTY AMOUNT: Pending ☐ TO SECRETARY

WATKINS, TOMASELLO
& CALEEN, P.A.
ATTORNEYS AND COUNSELORS AT LAW

1725 MAHAN DRIVE SUITE 201
TALLAHASSEE, FLORIDA 32308
(850) 671-2644 FAX (850) 671-2732
E-MAIL: WTC-FA@WTC-PA.COM

MAILING ADDRESS
POST OFFICE BOX 15828
TALLAHASSEE, FLORIDA 32317-5828

R. L. CALEEN, JR.
DEBORAH A. LACOMBE
THOMAS G. TOMASELLO
W. DAVID WATKINS

November 3, 1998

VIA FACSIMILE AND U.S. MAIL

L. Raoul Clarke
Hazardous Waste Management Section
Division of Waste Management
Department of Environmental Protection
2600 Blair Stone Road, M.S. 4555
Tallahassee, Florida 32399-2400

Re: International Petroleum Corporation Re-Refinery, Plant City, Florida: Response to Request For Additional Information With Regard To Adding the International Petroleum Re-Refinery to FDEP's "Vendor List of Antifreeze Recyclers"

Dear Mr. Clarke:

In response to my letter of October 9, 1998 requesting that the International Petroleum Corporation ("IPC") re-refinery in Plant City, Florida be added to the Department's "Vendor List of Antifreeze Recyclers," you recently asked for additional information. Specifically, you asked how use of the re-refined oil in the phosphate beneficiation process as a flotation reagent compared with use of the oil as a fuel, i.e., burning for energy recovery. As you know, the re-refined oil undergoes the same processing and the product has the same quality for both end uses. The product is equivalent to virgin No. 5 fuel burned for energy recovery but superior to virgin diesel blends used as a flotation reagent by the phosphate industry.

The records of the IPC re-refinery show that from January 1, 1997 through December 31, 1997, 7,343,038 gallons (55.27%) was sold as on-specification used oil fuel and 5,941,685 gallons (44.73%) was sold as a flotation reagent for use in the phosphate beneficiation process. The company advises, however, that there is a clear trend toward use as on-specification fuel and that the percentage of product used for this purpose should continue to increase.

Use of Re-Refined Oil As A Flotation Reagent

The phosphate industry still purchases a large amount of IPC's re-refined oil for use as a flotation agent in the beneficiation process. The re-refined oil manufactured by IPC is superior to virgin No. 5 blends because of the two-stage distillation process used by the re-refinery. The second-stage vacuum distillation removes lower boilers, including benzene, toluene, ethylbenzene,

and xylene (BETX) as well as many polynuclear aromatics (PAH). This explains why levels of BETX in IPC vacuum distilled oil are significantly lower than BETX levels found in blends with virgin diesel oil.

Benzene has been identified as the constituent of concern in waste antifreeze. Benzene testing of the re-refined oil (sold as fuel and flotation reagent) shows levels consistently below the Method Detection Limit. The removal of organic constituents by IPC's distillation process makes the re-refined oil safer for use and more protective of the environment than alternative flotation reagents available to the industry.

Moreover, the multi-stage distillation process assures that there is negligible water in the finished product. Since other recycled oil typically contains 5-10 percent water, the IPC product is more desirable and cost-effective for the phosphate industry.

In summary, IPC's unique two-stage distillation process recycles waste antifreeze by producing a product which has two distinct beneficial and valuable uses — both of which are protective of the environment. The waste antifreeze is recycled into a product no less useful or valuable than other recycling processes. IPC, therefore respectfully requests that it be added to the Department's "Vendor List of Antifreeze Recyclers" so that generators of waste antifreeze destined for the IPC facility will be treated the same as generators of antifreeze destined for other recycling facilities on the List.

Please call me if you have any further questions. Thank you for your cooperation.

Sincerely,

R. Caleen

R. L. Caleen, Jr.

xc: Garry Allen, President, IPC

1039:RLC:kj

WATKINS, TOMASELLO
& CALEEN, P.A.
ATTORNEYS AND COUNSELORS AT LAW

1725 MAHAN DRIVE, SUITE 201
TALLAHASSEE, FLORIDA 32308
(850) 671-2644 FAX (850) 671-2732
E-MAIL: WTC-PA@WTC-PA.COM

MAILING ADDRESS
POST OFFICE BOX 15828
TALLAHASSEE, FLORIDA 32317-5828

R. L. CALEEN, JR.
DEBORAH A. LACOMBE
THOMAS G. TOMASELLO
W. DAVID WATKINS

October 9, 1998

VIA FACSIMILE AND U.S. MAIL

L. Raoul Clarke
Hazardous Waste Management Section
Division of Waste Management
Department of Environmental Protection
2400 Blair Stone Road, M.S. 4555
Tallahassee, Florida 32399-2400

Re: **International Petroleum Corporation Re-Refinery, Plant City, Florida: Request For Inclusion on FDEP Vendor List of Antifreeze Recyclers**

Dear Raoul:

Request for Listing: On behalf of International Petroleum Corporation, we respectfully request that FDEP immediately add International Petroleum's used oil and antifreeze re-refinery to the "Vendor List of Antifreeze Recyclers," last updated on February 12, 1998 (Copy attached).

The name and address of International Petroleum's re-refinery is:

INTERNATIONAL PETROLEUM CORPORATION
105 South Alexander Street
Plant City, Florida 33566
(800) 282-9585
(813) 754-1504
Serving all of Florida

The listing should be placed under the headings of "Antifreeze Recycling Facilities" and "Antifreeze Collectors."

The IPC Re-Refinery: As you know, International Petroleum's oil re-refinery is state of the art, using the most advanced technology. The refining process utilizes a unique multi-stage distillation system including atmospheric and vacuum distillation columns. Through this process, used oil, used antifreeze, and contaminated petroleum products, including off-specification virgin fuels, are

recycled into on-specification used oil fuel that is equivalent to Virgin No. 5 Fuel Oil. The Virgin No 5 equivalent oil may also be blended with other virgin fuels to meet the specifications of customers

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

Light distillates, condensed by the process, are used as the primary fuel for the on-site Born furnace which provides energy for the recycling process. These light hydrocarbons consist mainly of gasoline, kerosene, and diesel fuel with a low flash point, and hydrocarbons resulting from the processing of used antifreeze. This off-specification used oil is burned incidental to used oil processing in accordance with 40 C.F.R. §279.60(a)(2) and an FDEP approved Air Operating Permit.

The International Petroleum re-refinery was designed and is permitted by FDEP to accept and process non-hazardous antifreeze. Just as used oil is processed into fuel and recycled by burning for energy recovery in accordance with state and federal laws, so too is the used anti-freeze. See, §§ 62-701.200(94) and 62-710.210(2), F.A.C., defining recycling to include burning for energy recovery. All of the used antifreeze not burned as primary fuel in the on-site Born furnace is processed into and sold as on-specification fuel oil in accordance with the federal and state used oil management regulations.

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

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

1. Antifreeze (glycol) is pumped into an International Oil Service tank truck.

2. Truck is received at the Plant City Tank Farm.

3. The truck contains "used oil" in one compartment and used antifreeze/water in another.

4. Both the "used oil" and glycol are pumped into a feed tank which has a high volume circulating pump to keep the feedstock for the refinery blended. Blending keeps the refinery operating at a level water/oil mixture, which is necessary for a smooth flow rate.

5. This feedstock is pumped to a heat exchanger, heated in the exchanger and then flows to an atmospheric distillation column. Column temperatures are kept to a minimum in an effort to remove most of the water and those low boilers that typically boil at or below that of water. Note: The residual oil must have a flash point in excess of 100 degrees F. to meet EPA guidelines.

6. The partially distilled feedstock is then pumped to a vacuum distillation column where due to loss of heat to the atmosphere from the "skin" of the columns, pumps, valves and piping, it is processed at a lower temperature than the atmospheric column. A vacuum is pulled allowing more water to be evaporated from the feed stock along with a small amount of additional low boilers.

7. The remaining product (dehydrated used oil and glycol along with any other high boilers) is cooled through chilling exchangers and pumped into a storage tank for testing to meet EPA and FDEP used oil specifications for burning before it is shipped to a customer.

8. Low boilers and water extracted as vapor from both the atmospheric and vacuum distillation system are chilled back to a liquid and separated by gravity to remove the low boilers for use as a fuel to fire the hot oil heater furnace.

9. The "distilled" water phase is pumped to a sour water stripper column where it is heated with steam to "steam strip"

remaining low boilers from the water. These "steam stripped" low boilers are piped back to the condensing tank for use as a liquid fuel or piped as a vapor directly to a designated burner in the furnace to be burned for energy recovery.

10. All low boilers are burned for energy recovery. All "distilled" and "steam stripped" waters are treated in a dissolved air flotation system (D.A.F.) before discharge by permit to the City of Plant City P.O.T.W.

11. All "FLOC" which comes off the D.A.F. is pumped back to the feed tank for the refinery.

With a heating value of 8200 Btu/lb used antifreeze, i.e. ethylene glycol, has a bonafide, legitimate and beneficial use as fuel, particularly after processing by the re-refinery.

No Department rules or policies limit recycling to returning a material to its original use or declare that return to original use is superior to use for energy recovery. International Petroleum has as much right as any other waste antifreeze re-recycler to be listed on the Department's "Vendor List of Antifreeze Recyclers" as a legitimate collector and recycler. Although many of the listed antifreeze recycling services purport to reprocess the antifreeze to original specifications or something akin to them, their recycling process (unlike International Petroleum's, which is heavily regulated) is not monitored, permitted, or regulated by the Department.

Prominent on the Department's "Vendor List of Antifreeze Recyclers" is the statement that the information contained on the list was voluntarily supplied by the listed companies, and that a company's absence from the list "does not imply prejudice or impropriety." The Vendor list also denies that the listing endorses any specific antifreeze recycler or collector or that the listing implies that the companies are in compliance with applicable laws.

Although published with the best of intentions, the incomplete "Vendor List of Antifreeze Recyclers" implies Department endorsement of the listed companies and provides them with a competitive advantage because the Vendor List is used as a promotional device. Unless International Petroleum's recycling facility and antifreeze collection program are added to the Vendor List International Petroleum will continue to suffer substantial economic harm.

Fortunately, this can be easily rectified by updating the "Vendor List of Recyclers" to include International Petroleum's antifreeze collection and recycling programs. The cost of publication is inconsequential.

We would appreciate your response, in writing, as to the Department's proposed action in response to this request. If the Department refuses to update the list by adding International Petroleum as a collector and recycler of waste antifreeze, please specify the reasons for doing so. Any such refusal would adversely affect the substantial interests of International Petroleum

Do not hesitate to call me if you have any questions or require further information. Thank you for your courtesy.

Sincerely,

R. L. Caleen, Jr

cc: Garry Allen, President
International Petroleum Corporation

1039:RLC:lmp

Department of Environmental Protection

Lawton Chiles
Governor

Southwest District
3804 Coconut Palm Drive
Tampa, Florida 33619

Virginia B. Wetherell
Secretary

DEC - 1 1997

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

RE: International Petroleum Corporation
EPA ID# FLD 065 680 613
Warning Letter #187521
Hillsborough County

Dear Mr. Allen:

The purpose of this letter is to advise you of possible violations of law for which you may be responsible, and to seek your cooperation in resolving the matter. A hazardous waste program field inspection conducted on September 17, 1997, indicates that violations of Florida Statutes and Rules may exist at the above referenced facility. Department of Environmental Protection personnel made observations described in the attached inspection report. Section 10 of the report lists a summary of alleged violations of Department Rules.

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

You are requested to contact Jim Dregne at (813)744-6100, extension 379, within fifteen (15) days of receipt of this Warning Letter to arrange a meeting to discuss this matter. The Department is interested in reviewing any facts you may have that will assist in determining whether any violations have occurred. You may bring anyone with you to the meeting that you feel could help resolve this matter.

Please be advised that this Warning Letter is part of an agency investigation, preliminary to agency action in accordance with Section 120.57(4), F.S. If after further investigation the Department's preliminary findings are verified, this matter may be resolved through the entry of a Consent Order which will include a compliance schedule, an appropriate penalty, and reimbursement of the Department's costs and expenses. In accordance with the United States Environmental Protection Agency's (EPA) RCRA Civil Penalty Policy of 1990, the penalties which could be assessed in hazardous waste cases are up to $25,000 per day per violation. Costs and expenses in this case will be a minimum of $100. If this matter cannot be resolved within 90 days, under the

Department's agreement with the EPA, a formal administrative complaint or "Notice of Violation" (NOV) must be issued against you within 150 days of the date of the attached inspection report. We look forward to your cooperation in completing the investigation and resolution of this matter.

Sincerely,

for Richard D. Garrity, Ph.D.
Director of District Management
Southwest District

RDG/jd

Enclosure

cc: Panduranga Ojili, HWR
Kelley Boatwright, Hillsborough County EPC
Compliance File

Department of Environmental Protection

Lawton Chiles
Governor

Southwest District
3804 Coconut Palm Drive
Tampa, Florida 33619

Virginia B. Wetherell
Secretary

HAZARDOUS WASTE INSPECTION REPORT

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

FACILITY NAME: INTERNATIONAL PETROLEUM CORP. **DEP/EPA ID #:**FLD065680613

STREET ADDRESS: 105 South Alexander Street, Plant City, Florida 33566

MAILING ADDRESS: same

COUNTY: Hillsborough **PHONE:** (813)754-1504 **DATE:** 9/17&23/97 10/7/97 **TIME:** 1020 hrs

NOTIFIED AS: ☐ N/A

☒ non-handler	☐ non-handler
☐ CESQG (<100 Kg per month)	☐ CESQG (<100 Kg per month)
☐ SQG (100 Kg - 1000 Kg per month)	☐ SQG (100 Kg - 1000 Kg per month)
☐ LQG (>1000 Kg per month)	☐ LQG (>1000 Kg per month)
☐ transporter	☒ transporter
☐ transfer facility	☐ transfer facility
☐ interim status TSDF	☐ interim status TSDF
☐ permitted TSDF	☐ permitted TSDF
☐ unit types:	☐ unit types:
☐ exempt treatment facility	☐ exempt treatment facility
☒ used oil: gen./trans./market./processor	☒ used oil: gen./transporter./marketer./processor
☒ used oil filter:generator/transporter	☒ used oil filter:generator/transporter

2. **APPLICABLE REGULATIONS:**

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

3. **RESPONSIBLE OFFICIAL:**

Garry Allen - President

4. **INSPECTION PARTICIPANTS:**

Garry Allen - IPC	Frank Shibetti - IPC	David Pomella - IPC
Stanley Tam - FDEP	Beth Knauss - FDEP	Bill Crawford - FDEP
Jim Dregne - FDEP	Roger Evans - FDEP	Tony Malatino - Malatino & Assoc.

5. **LATITUDE/LONGITUDE:** 28°00'30"/82°08'00" 6. **SIC Code:** 2999

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

8. **PERMIT #:** n/a **ISSUE DATE:** **EXP. DATE:**

9. Facility and Process Description:

International Petroleum Corporation (IPC) was inspected on September 17, 1997, to evaluate its compliance with state and federal hazardous waste and used oil regulations. Follow-up visits were conducted on September 23 and October 7 & 17, 1997, to review company records. The inspection determined that the facility was primarily a generator, transporter, marketer, and processor of used oil. The inspection also determined that IPC was accepting, transporting, and treating hazardous waste antifreeze. The inspection team was accompanied throughout the inspection by the company's president, Mr. Garry Allen. Three follow-up visits were made to the facility to review records.

International Petroleum Corporation specializes in the re-refining of on-spec used oil. IPC produces a fuel oil that is equivalent to Virgin No. 5 Fuel Oil and a flotation oil for the phosphate industry. It has been at its current locations since 1984 and is currently employing about 35 people. The eight acre site contains an oil re-refinery facility, an industrial wastewater pre-treatment facility, storage tanks, maintenance garage, and administration building. According to Mr. Allen, the facility does not accept off spec used oil or hazardous waste. On occasions, the company may act as a broker for the disposal of hazardous waste for some IPC clients. The hazardous waste that is brokered is not transported by or to IPC, but is transported directly from the generator to the disposal facility.

The tank farm at IPC consist of 22 steel above-ground tanks. The total capacity of the tanks is approximately 1,267,000 gallons in the 20 tanks that are used to store used and re-refined oil. The facility also has two tanks used to store industrial waste water and oil contaminated water. Secondary containment for the tanks was found to be in adequate condition.

Used Oil and Oily Waste Products

Used oil and petroleum contaminated products including off spec virgin fuels, are processed into an on-specification used oil fuel using a multi stage distillation system. Water that is distilled from the used oil is pretreated in the company's wastewater treatment unit prior to being discharged to the City of Plant City POTW. The light distillates are burned in a furnace on site and provide the energy for the re-refinery process.

Used oil and petroleum contaminated products are delivered to the IPC facility via tanker trucks and rail tanker cars. The used oil products are pumped from tankers and rail cars through 40 mesh filter baskets to a 212,000 gallon above ground storage tank. The tank, No.83, is labeled "Used Oil". Used oil from tank No.83 is fed by above ground piping to the processing unit where it is processed through an atmospheric distillation column and a vacuum distillation column. The re-refined oil is then transferred to tank No.150. Normally the re-refined oil in tank No.150 is transferred to tank No.552 once a day. The processed oil in tank No. 552 is sampled and tested to determine if it meets used oil specifications. If the used oil meets specifications, it is released by IPC for shipment to clients or it is further blended.

Used Oil Filters

Crushed and uncrushed used oil filters are processed inside the southern side of the maintenance garage. Approximately 600 drums of used oil filters are delivered to the facility each month. Crushed filters are transferred into totes that are used to transport the filters to a metal recycler. Uncrushed used oil filters are dumped onto one of two processing tables where they are drained and inspected. All non metal filters are separated and disposed of into a solid waste roll off. The metal filters are crushed and put into totes. The crushed oil filters are shipped to U.S. Foundry in Medley, Florida, for smelting. At the time of the

inspection, fifteen drums of used oil filters were awaiting processing. All drums were properly labeled and closed. Beneath the two inspection/draining tables were containers used to collect the used oil from the filters. The containers were not labeled "Used Oil" in violation of **40 CFR 279.22(c)**. The used oil collected during the used oil filter processing is pumped into a 250 gallon AST in the garage. The AST was properly labeled "Used Oil". Oil collected in this tank is transferred to tank No.83 before going through the re-refining process.

After the filters have been removed from the 55 gallon drums, the empty drums are transferred to a drum wash area located at the west end of the product oil tank farm. The drums are pressured washed with water. Diesel or kerosene are used to cut the oil. The oily waste from the drum cleaning operation drains to a sump next to the wash area. The oily waste is pumped from the sump, via above ground piping, to used oil tank No. 83. If the waste generated at the wash area is water, a valve can be used to route the wastewater to Tanks SKE or SKW. The above ground piping from the sump was labeled "Used Oil".

Wastewater

Wastewater, including petroleum contact water (PCW), industrial wastewater, rainwater collected in secondary areas, and water distilled from the used oil is accumulated in two 47,000 gallon AST's, tanks SKE and SKW. The wastewater is treated in a pre-treatment system consisting of gravity separation, chemical treatment, flocculation, coagulation, and dissolved air flotation. Any oil recovered from the tanks by gravity separation or dissolved air flotation is pumped to tank No.83 for re-refining. Following pre-treatment of the wastewater in the IPC pre-treatment unit, the pre-treated water is discharged to the City of Plant City POTW.

Used Antifreeze

Used antifreeze is processed at the facility in the same manner as used oil. Used antifreeze picked-up by IPC drivers is place in a separate compartment in the tanker trucks. When the truck arrives at the IPC facility, the waste antifreeze is pumped into tank No.83 with the used oil. The antifreeze is processed in the same manner as the used oil. The ethylene glycol from the antifreeze is not reclaimed during the processing. According to Mr. Allen, IPC requires a hazardous waste determination be made prior to the acceptance of any used antifreeze from generators. Some antifreeze was picked-up from small quantity generators before proper waste determinations were conducted. Antifreeze picked-up at Jiffy Lube facilities was consolidated into one waste determination. This practice should stop immediately. A separate waste determination is necessary for each facility.

A waste determination is required of all antifreeze generated by small quantity generators that is destined for disposal. Contaminants of concerns that have been identified by the Department are benzene, trichloroethylene, tetrachlorethylene, and lead. The maximum concentrations for the toxicity characteristic for these four contaminants are as follows:

Contaminant	Regulatory Level
Benzene	0.5 mg/L
Tetrachloroethylene	0.7 mg/L
Trichloroethylene	0.5 mg/L
Lead	5.0 mg/L

A review of IPC records showed that the analysis of used antifreeze from eight clients was hazardous for one or more of the contaminants of concern. The company's records also showed that the hazardous waste

antifreeze was managed as non-hazardous and was accepted for processing at IPC. Twenty-one shipments of hazardous waste antifreeze were accepted and processed by IPC between December 12, 1995 and September 1997. The following IPC client's used antifreeze was determined to be hazardous based on analysis from state certified laboratories:

#	Generator	Date of Analysis	Laboratory	Contaminant	Results	Pickups
1.	Daytona Linc/Merc	5/29/97	Progress Env.	Tetrachloro.	.891 mg/L	1
2.	Halifax Ford Mercury	7/14/97	Progress	Tetrachloro.	.714 mg/L	3
3.	Honda, Merritt Island	1/28/97	Enco	Tetrachloro.	.700 mg/L	3
4.	Jim's Import Auto	8/1/97	Progress	Lead	10.0 mg/L	2
5.	Mazda Village	12/12/95	Enco	Trichloro.	11.3 mg/L	5
				Tetrachloro.	18.4 mg/L	
6.	McNamara Pontiac	3/5/97	Progress	Tetrachloro.	1.41 mg/L	3
7.	Moody Truck Center	4/25/97	Progress	Tetrachloro.	1.24 mg/L	2
8.	Florida Clark Lift	8/17/97	HOWCO	Lead	38.1 mg/L	2

The Department found additional cases of hazardous waste antifreeze being handled by IPC from conditionally exempt small quantity generators (CESQG). A CESQG's hazardous wastes are not subject to regulation under Parts 262 through 266 of 40 C.F.R.. In some of these instances, IPC determined that the client was a CESQG after the hazardous waste was picked-up and treated. IPC should institute a procedure that ensures that waste antifreeze is not handled until a proper waste determination is made and after it is confirmed that the client is not subject to the hazardous waste regulations in Parts 262 through 266 of 40 C.F.R.

IPC failed to file a written notification with the Department that it was transporting and treating hazardous waste. The hazardous waste antifreeze was being stored in Tank No.83. IPC failed to comply with the requirements governing the storage of hazardous waste in a tank system. Storing and treating hazardous waste without notifying as a hazardous waste facility, obtaining a permit or complying with 40 CFR Part 264 standards is a violation of **403.727(3)(b), F.S.** It is also a violation of **40 CFR 263.20** for a transporter to accept hazardous waste (antifreeze) from a small quantity generator unless it is accompanied by a manifest signed in accordance with the provisions of 40 CFR 262.20.

Solid Waste

Solid waste managed at the facility includes oily solid waste generated by IPC and clients. Oil contaminated solid waste is picked-up by IPC as a service to their clients. The solid waste handled by IPC includes filter basket debris, sludge, absorbent, contaminated dirt, and rags. This waste is managed as non hazardous and sent to Clark Environmental Incorporated (Clark) for disposal.

A large amount of the solid waste generated by IPC comes from the clean-out of the lint traps and sumps. The company has done extensive analysis of this waste stream and determined it to be non hazardous. The Department did split sampling of this waste stream previously and confirmed that the lint and sludge was non hazardous. The waste profile document for this waste stream was prepared on August 19, 1991, and is on file with Clark.

A review of records at IPC and Clark show that there has been at least thirteen shipments of waste from IPC to Clark in 1997 using the 1991 waste profile document described as "filter cleaning and soil". A closer review of these shipments shows that they included drums of solid waste from clients and waste from IPC that is not reflective of the 1991 profile document. The solid waste collected from clients did not

include a waste determination and may have been a hazardous waste. On March 10, 14 &17, 1997, eleven truck loads of soil, sand and sludge, were manifested to Clark as non hazardous using the 1991 profile document. This waste was generated at IPC from the cleaning of storage tanks and rail cars. No waste determination was performed on this waste in violation of **40 CFR 262.11.**

IPC was cited during a Department inspection in February 10, 1993, for failing to make waste determinations for 18 of 20 shipments of waste from IPC to Clark Environmental. This practice of failing to make a proper waste determination has continued.

Transportation

The majority of used oil, used oil filters, and oily wastes are brought to the facility by International Oil Service (IOS) tanker trucks owned by IPC. Used oil and oily waste are also delivered by common carriers, independent oil transporters and tanker rail cars. IOS has a fleet of 18 trucks that are maintained at the IPC maintenance garage. The IOS trucks are also used to deliver products to customers. According to Mr. Allen, the company has only had one traffic accident with a tanker truck and there was no spill of used oil at the time. The facility ID number is displayed on each vehicle.

A rail spur is located along the south side of the facility. Used oil delivered by rail only stays at the facility for a few days depending on the time it is staged at the spur. The spur lacked adequate containment to prevent the migration of used oil out of the system in violation of **40 CFR 279.54(c)(2).**

Contingency Plans

The facility had adequate emergency communication, fire protection, and spill control equipment appropriate for the waste being handled at the facility. The facility had both a public address system and bell alarm system to notify employees of a plant emergency. The facility was equipped with 32 fire extinguishers, seven hose and reel systems, and a fire suppression system. The equipment is operational and is inspected annually by Sunstate Fire Extinguisher Service, Lake Wales, Florida. The equipment was last inspected in June 1997.

Records

The company notified the state of its used oil activities. The company applied for registration as a used oil transporter, marketer, processor and used oil filter transporter, transfer facility, processor on February 26, 1997. The registration was for the period July 1, 1997 to June 30, 1998. Copies of licenses, registrations and authorization documents were posted on the wall in Mr. Allen's office. The transporter ID number is also painted on each IPC vehicle. The annual collection report submitted for 1996 showed that the company collected 18,279,791 gallons of used oil and 1,046,175 used oil filters. Certification of required accident insurance is being maintained. Current insurance is with National Union Fire Insurance Company.

All receipts for pick-up and delivery of used oil products are maintained in the administration office. These records are complete and very well organized. Pick-up receipts from generators are maintained by driver and date of pick-up. The EPA ID number of the generator is not on the pick-up receipts, but the EPA ID numbers for all used oil generators that have ID numbers is maintained on a company printout. Receipts for the used oil delivered to the plant are also maintained for each driver by day.

10. Summary of Alleged Violations:

40 CFR 262.11	A person who generates a solid waste, as defined in 40 CFR 261.2 must determine if that waste is a hazardous waste. Such a determination had not occurred for eleven loads of waste from International Petroleum Corporation to Clark Environmental.
40 CFR 263.20	Transportation of hazardous waste antifreeze without a manifest.
40 CFR 279.22(c)	Failure to label two containers used to store used oil with the words "Used Oil".
40 CFR 279.54(c)(2)	Failure to provide adequate secondary containment for rail cars containing used oil.
403.727(3)(b), F.S.	Storing and treating hazardous waste without notifying as a hazardous waste facility, obtaining a permit or without complying with 40 CFR Part 264 standards.

Report prepared by: _____
James M. Dregne
Environmental Specialist II

Approved by: _____ Date: 11/18/97
Elizabeth B. Knauss
Environmental Manager

USED OIL PROCESSOR CHECKLIST

Facility Name: IPC Date: SEPTEMBER 17, 1997

Facility Representative: GARRY ALLEN Facility ID : FLD 065 680 613

Inspector: JIM DREGNE Registration #

40 CFR 279 Subpart F -- Processor Standards

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

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

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

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

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

4. Does the processor have a general permit? 62-710.800(1)) Y ✓ N____

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

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

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

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

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

   In good condition? Y ✓ N____

   Closed or otherwise protected from weather? Y ✓ N____

   Labeled "Used Oil Filters"? Y ✓ N____

   Stored on an oil impervious surface? Y ✓ N____

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

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

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

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

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

Facility Name: TPC
Date: 9/17/97

Oil Management Standards - 279.54

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

2. If the facility has tanks, do they comply with 62-761 and 62.762 F. A. C. rules? Y ✓ N ____
   (Applicable to USTs over 100 g and ASTs over 550 gallons. Describe in narrative, including number and size of tanks, noting registration numbers if applicable, and compliance status.)

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

   * rail cars do not have adequate secondary containment

3. Are containers and tanks in good condition and not leaking? (279.54(b)) Y ✓ N ____

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

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

5. Are ASTs, UST tank fill lines and containers labeled "used oil? (279.54(f)) Y ✓ N ____

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

General Facility Standards - 279.52

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

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

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

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

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

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

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

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

Facility Name: IPC
Date: 9/17/97

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

9. Has the facility made emergency response arrangements with the following: (279.52(a)(6))

Fire Department:_____ Y ✓ N_____
Police:_____ Y ✓ N_____
Hospital:_____ Y ✓ N_____
Emergency Response Contractor:_____ Y ✓ N_____

10. If not, has the facility attempted to do so and is the refusal documented? Y_____ N_____ NA ✓

Contingency Plans and Emergency Response – 279.52(b)

1. Does the facility have a contingency plan? Y ✓ N_____

2. Is it at the facility and easily available? Y ✓ N_____

3. Does the plan include:

Fire Response Procedure: (compare to 279.52(b)(6)) N/A_____ Y ✓ N_____
Spill Response Procedures: " N/A_____ Y ✓ N_____
Explosion Response Procedures: " N/A_____ Y ✓ N_____
Instructions for handling contaminated materials & residues Y ✓ N_____
A description of arrangements with local authorities: N/A_____ Y ✓ N_____
Emergency Coordinators: (Name) GARRY ALLEN Y_____ N_____
Addresses and telephone numbers of Emergency Coordinators: Y_____ N_____
Emergency equipment list: Y_____ N_____
Specifications and capabilities of emergency equipment: Y_____ N_____
Locations of emergency equipment: Y_____ N_____
An evacuation plan and routes: Y ✓ N_____
Evacuation/alarm signals: Y ✓ N_____
External reporting procedures: Y ✓ N_____
Internal recordkeeping requirements: Y ✓ N_____

4. Is the plan up to date, with no changes to the list of emergency equipment, list of emergency coordinators, applicable regulations or contingency plan failures since the last revision? (279.52(b)(4)) Y ✓ N_____ Submitted w/ permit applicat

5. Has the plan been distributed to the local police, fire department, ERT and hospital? Circle omitted authorities. (279.52(b)(3)) Y ✓ N_____

6. Is the emergency coordinator authorized to commit funds for incident response? Y ✓ N_____

7. Has the processor noted in the operating record any incidents requiring implementation of the contingency plan? (279.52(b)(6)(ix)) Y ✓ N_____

9. Were written reports made within 15 days to the DEP? (279.52(b)(6)(ix)) Y_____ N_____

Facility Name: [redacted]PC
Date: 9/17/97

Rebuttable Presumption and Analysis Plan – 279.53, 279.55

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

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

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

   Sampling methods? Y ✓ N ____

   Frequency of sampling? Y ✓ N ____

   Analytical Methods? Y ✓ N ____

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

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

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

   If so, was the oil managed as hazardous waste? Y ____ N ✓ Not accepted or rebutted

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

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

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

   Sampling methods? Y ✓ N ____

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

   Frequency of sampling? Y ✓ N ____

   Analytical Methods? Y ✓ N ____

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

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

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

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

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

Facility Name: PC
Date: 9/17/97

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

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

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

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

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

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

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

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

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

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

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

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

   Cleaning and decontaminating tanks and ancillary equipment? Y N

   Removing contaminated soils? Y N

   Eliminating the need for further maintenance? Y N

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

USED OIL TRANSPORTER CHECKLIST

Facility Name: IPC Date: SEPTEMBER 17, 1997

Facility Representative: GARRY ALLEN Facility ID # FLD 065680613

Inspector: JIM Dregne

40 CFR 279 Subpart E -- Transporter Standards

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

   On site transport?

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

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

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

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

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

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

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

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

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

7. If any oil is discharged during transport, does the transporter: [279.43(c)] N/A — no discharges NO SPILLS

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

   Report to DOT in writing per 49 CFR 171.16? Y____ N____

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

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

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

   In good condition? Y✓ N____

   Closed or otherwise protected from weather? Y✓ N____

   Labeled "Used Oil Filters"? Y✓ N____

   Stored on an oil impervious surface? Y✓ N____

Facility: [redacted] PC
Date: September 17, 1997

Transporter Recordkeeping -- 279.46

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

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

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

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

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

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

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

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

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

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

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

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

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

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

USED OIL MARKETER CHECKLIST

Facility Name: IPC Date: SEPTEMBER 17, 1997

Facility Representative: GARRY ALLAN Facility ID #: FLD 065 680 613

Inspector: JIM DREGNE Registration #: _____

40 CFR 279 Subpart H – Marketer Standards

1. Does the facility direct shipments of off-specification used oil to used oil burners? (except processors who burn incidentally) Y____ N✓

   Or does the facility first claim that used oil that is to be burned for energy recovery meets the used oil fuel specification Y✓ N DNC

2. Check other Subparts the marketer complys with. (Must comply with at least one and have EPA ID #)

   ✓C - Generator ✓E - Transporter ✓F - Processor ____G - Burner

3. Is the facility registered? (62-710.500(1)(c))) Y✓ N____

4. Does the marketer only send off specification oil to burners with EPA ID Numbers (279.71(a)) Y____ N✓

   And approved Industrial Furnaces or Boilers(279.71(b)) Y____ N✓ DOES NOT HANDLE OFF SPEC OIL.

5. Does the marketer claim the used oil meets the specification by analysis? Y✓ N____

   Or by obtaining copies of generator performed analyses? (279.72(a)) Y____ N✓

6. Does the marketer have copies of written and signed certifications from all off specification oil burners to which he has directed shipments stating that the burner: (279.75)

   Has notified EPA of its used oil management activities? Y____ N____

   Will only burn off spec oil in an approved device? Y____ N____

7. Do Off specification oil delivery records include: (279.74(a)) NO OFF SPEC OIL

   Name & Address of transporter delivering oil? Y____ N____
   EPA ID # of transporter? Y____ N____
   Name & Address of receiving burner? Y____ N____
   EPA ID # of receiving burner? Y____ N____
   Quantity of oil shipped? Y____ N____
   Date of shipment? Y____ N____

8. Do on specification oil delivery records include: (279.74(b))

   Name & Address of receiving facility? Y✓ N____
   Cross reference to analysis or other information used to determine that the oil meets the specification? Y✓ N____
   Quantity of oil shipped? Y✓ N____
   Date of shipment? Y✓ N____

9. Does the marketer keep copies of records for three years? (279.72(b)) Y✓ N____

10. Does the facility maintiain records on DEP Form 62-710.900(2), including type of oil and destination or end use? Y✓ N____

11. Does the facility submit annual reports by March 1? Y✓ N____

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USED OIL GENERATOR CHECKLIST

Facility Name: IPC Date: SEPTEMBER 17, 1997

Facility Representative: GARRY ALLEN Facility ID #: FLD 065 680 613

SIC Codes: 2999 Inspector: JIM DREGNE

40 CFR 279 Subpart C -- Generator Standards

1. Describe the facility's used oil streams:

WASTE DESCRIPTION	*ON/Off Specification*	*Testing or Process Knowledge*	*Generation Rate*	*Disposal Facility and EPA ID*
USED OIL	ON	testing	VARIES	IPC
used oil filters	—	—	VARIES	U.S. Foundry

2. Does the generator mix hazardous waste with the used oil?(279.10) Y ✓ N ____ HAZARDOUS WASTE ANTI FREEZE WITH USED OIL

3. If so, is the facility a CESQG? Y ____ N ____

4. If not, Is the oil mixed with a characteristic hazardous waste? (describe waste) Y ____ N ____

   If so, does the facility document that the resultant mixture does not exhibit any characteristic of hazardous waste? Y ____ N ____

   Or, if the hazardous waste is only D001, that the resultant mixture is not ignitable? Y ____ N ____

   If the facility is not a CESQG, and oil is mixed with a listed hazardous waste, it must be managed as a hazardous waste.

   ? NO WASTE DETERMINATION ON SOLID WASTE to CLARK.

5. Does the facility generate other materials contaminated with used oil? Y ✓ N ____

   If so, are the materials burned for energy recovery as used oil? Y ____ N ✓

   or, Does the facility have records documenting the residuals are not hazardous waste? Y ____ N ____

6. Does the generator claim that the used oil meets the specification in 279.11? Y ✓ N ____

   If so, and the oil is to be burned for energy recovery, the generator is a marketer subject to 40 CFR 279 Subpart H