MALATINO & ASSOCIATES

"Specialists in Environmental Services"

TONY MALATINO, C.H.M.S.
President

4415 Florida National Drive, Suite 101
P.O. Box 6630
Lakeland, Florida 33807-6630

(813) 646-2828
(800) 330-3001
Fax (813) 648-4285

CEI

Jim Clark, CHMM

Clark Environmental, Inc.

755 Prairie Industrial Parkway
Mulberry, Florida 33860
813-425-4864 • Fax: 813-425-4642

INTERNATIONAL PETROLEUM CORPORATION OF FLORIDA

105 South Alexander Street
Plant City, Florida 33566

Florida Watts 1-800-282-9585
Plant City (813) 754-1504
Tampa (813) 229-1739

GARRY R. ALLEN

Copy

Department of Environmental Protection

Jeb Bush
Governor

Southwest District
3804 Coconut Palm Drive
Tampa, Florida 33619

March 12, 2001

David B. Struhs
Secretary

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

RE: Settlement Agreement, OGC Case No. 00-2345
International Petroleum Corporation
FLD 065 680 613, Hillsborough County

Dear Mr. Allen:

Enclosed is a copy of the executed Settlement Agreement for the referenced case.

In order to close this case, you have agreed to pay in settlement the amount of $18,896.00, along with $1,264.00 to reimburse the Department costs, for a total of $20,160.00. The payment shall be made in 24 equal monthly installment payments of $840.00. Payments are due on the 20th of each month. Final payment is due no later than January 20, 2003. The Department received the first payment on February 7, 2001.

Your continued cooperation is appreciated. If you have any question please call me at (813) 744-6100, extension 410.

Sincerely,

James M. Dregne
Environmental Specialist III
Division of Waste Management

JMD/jd

Enclosure

cc: Kathy Carter, OGC
Steven Ray, HWR Section
Jeff Pallas, US EPA Region IV
Kelley Boatwright, Hillsborough County EPC
R.L. Caleen Jr., Watkins & Caleen, P.A.
Compliance File

Department of Environmental Protection

Jeb Bush
Governor

Southwest District
3804 Coconut Palm Drive
Tampa, Florida 33619

David B. Struhs
Secretary

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

February 16, 2001

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

Re: Proposed Settlement of International Petroleum Corporation
FLD 065 680 613
OGC File No.:00-2345

Dear Mr. Allen:

The purpose of this letter is to complete the resolution of the matter previously identified by the Department in the Warning Letter dated December 1, 1997, a copy of which is attached. The corrective actions required to bring the International Petroleum Corporation facility into compliance have been performed. In order to resolve the matters identified in the attached Warning Letter, you have agreed to pay in settlement the amount of $18,896.00, along with $1,264.00 to reimburse the Department costs, for a total of $20,160.00. This payment must be made payable to The Department of Environmental Protection by certified check or money order and shall include the OGC File Number assigned above and the notation "Ecosystem Management and Restoration Trust Fund." Payment shall be sent to the Department of Environmental Protection, 3804 Coconut Palm Drive, Tampa, Florida, 33619-8318. The payment shall be made in 24 equal monthly installment payments of $840.00 commencing within 10 days of your signing this letter. Final payment is due no later than February 20, 2003. Failure to timely make any installment payment will allow the Department, at its discretion, to accelerate the balance which will become immediately due. The department agrees that your signature of this letter is not an admission that your facility was in violation of the regulations cited in the Warning Letter.

Your signing of this letter constitutes your acceptance of the Department's offer to resolve this matter on these terms. If you elect to sign this letter, please return it to the Department at the address indicated above. The Department will then countersign the letter and file it with the Clerk of the Department. When the signed letter is filed with the Clerk, the letter shall constitute final agency action of the Department, which shall be enforceable pursuant to Sections 120.69 and 403.121, Florida Statutes.

If you do not sign and return this letter to the Department at the District address above by March 9, 2001, the Department will assume that you are not interested in settling this matter on the above described terms, and will proceed accordingly. None of your rights of substantial interests are determined by this letter unless you sign it and it is filed with the Department Clerk.

Sincerely yours,

James F. Cleary for

Deborah A. Getzoff
Director of District Management
Southwest District

I ACCEPT THE TERMS OF THIS SETTLEMENT OFFER IDENTIFIED ABOVE.

For: International Petroleum Corp

By: Gary R. Allen
Gary R. Allen
President
International Petroleum Corp.

For the Department:

James F. Cleary

Deborah A. Getzoff
Director of District Management
State of Florida Department of
Environmental Protection

ENTERED this 12 day of March, 2001 in Tampa, Florida.

DAG/jmd

Attachments

FILING AND ACKNOWLEDGEMENT
FILED, on this date, pursuant to S120.52 Florida Statutes, with the designated Department Clerk, receipt of which is hereby acknowledged.

Betty Rodgers 3-12-01
Clerk Date

NOTICE OF RIGHTS

Persons who are not parties to this Settlement Agreement but whose substantial interests are affected by this Settlement Agreement have a right, pursuant to Sections 120.569 and 120.57, Florida Statutes, to petition for an administrative hearing on it. The Petition must contain the information set forth below and must be filed (received) at the Department's Office of General Counsel, 3900 Commonwealth Boulevard, MS-35, Tallahassee, Florida 32399-3000, within 21 days of receipt of this notice. A copy of the Petition must also be mailed at the time of filing to the District Office named above at the address indicated. Failure to file a petition within the 21 days constitutes a waiver of any right such person has to an administrative hearing pursuant to Sections 120.569 and 120.57, Florida Statutes.

The petition shall contain the following information: (a) The name, address, and telephone number of each petitioner; the Department's Settlement Agreement identification number and the county in which the subject matter or activity is located; (b) A statement of how and when each petitioner received notice of the Settlement Agreement; (c) A statement of how each petitioner's substantial interests are affected by the Settlement Agreement; (d) A statement of the material facts disputed by petitioner, if any; (e) A statement of facts which petitioner contends warrant reversal or modification of the Settlement Agreement; (f) A statement of which rules or statutes petitioner contends require reversal or modification of the Settlement Agreement; (g) A statement of the relief sought by petitioner, stating precisely the action petitioner want the Department to take with respect to the Settlement Agreement.

If a petition is filed, the administrative hearing process is designed to formulate agency action. Accordingly, the Department's final action may be different from the position taken by it in this Notice. Persons whose substantial interests will be affected by any decision of the Department with regard to the subject Settlement Agreement have the right to petition to become a party to the preceding. The petition must conform to the requirements specified above and be filed (received) within 21 days of receipt of this notice in the Office of General Counsel at the above address of the Department. Failure to petition within the allowed time frame constitutes a waiver of any right such person has to request a hearing under Sections 120.569 and 120.57, Florida Statutes, and to participate as a party to this proceeding. Any subsequent intervention will only be at the approval of the presiding officer upon motion filed pursuant to Rule 28-106.205, Florida Administrative Code.

Mediation under Section 120.573, Florida Statutes, is not available in the proceeding.

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

CESQG

Customer	Cust. Key	Test Date
Bently Bros. Ranch	B 3554	
BFI New Port	B 3846	
BJ's Towing	B 3928	
Blasters	B 1830	
CD Auto	A 1409	
Cocoa High School	C 3855	
East Coast Auto	A 2994	
Fields Equipment	F 3937	
Fl. Strawberry Festival	F 3829	
Frank's Auto	A 1327	
Gateway Honda	H 0186	1/31/96
Gertsman's Used Parts		
Great Fruit Company	G 1433	
Holiday Chevrolet	C 1764	
Jiffy Lube 4060 Bee Ridge Rd.	J 3755	
Jiffy Lube # 1073	J 2267	
Jim Quinlan Nissan	N 3625	
Jones Oil & Tire	J 0262	
Levy Co. Rd. Dept. Garage	L 0294	
Lighting Lube	L 3740	
Mobile Lube Express	M 4006	
Monahan's Schell	S 0334	
Owl Creek Boat Works	O 0367	
Palm Bay Tire	P 3741	
PDG Electric	P 3777	
Reeds Auto Salvage	R 3770	
Richens & Sons	R 0411	
Sears # 8375	S 1944	
Smoak Groves	S 0456	4/16/97
Swart Lnadscaping	S 3863	
Teen Mission	T 4074	2/6/97
Texaco Express Lube	T 4128	
Texaco Express Lube	T 4028	
Texaco Express Lube	T 4168	
Wallace International	W 0542	
White Ford	F 1252	

International

water / flash / halogen
- ~~truck~~ tank T83
- lint/trash goes to

IES lab

150 - 212 - 7000

1996 clean out 552 552 - process 7000

pull dead bottom -

Clark manifest ?
decant tank
Rich has

1800 gal

Tet .7
Trid .5
Benzn .5
5.0

Phoshate

Ferman of Florida 8/31/99
Pelican Quick Lub 8/31/99
Lokey KIA 8/31/99
Tiller Sunoco 9/7/99
Daytona Pontiac 9/3/99
Pellcan Quick Lube 8/31/99

} OK

GAGet - sludge - 9/17/99 6 drums
spill - analyticals & RCRA

- Keys Concrete drain 9/14/99
dirt

Gulf Coast Dodge 3/27/98
Ft Meyers, FL
15565 Tamiami Trail

} anti freeze
leaded
Lead 47 ppm

- Commercial Metals 1/23/99

- TECO GANNON.

EAST BAY SANITATION
SONNY'S Tire + Auto
WOW Enterprises
U-HAUL Cargo Repair
DAMRON Toyota
HALIFAX FORD
Jim's Import Auto
MCNAMARA PONTIAC
Stuart Diesal
Florida Rock

Discharge Report Form

PLEASE PRINT OR TYPE

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

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

1. Facility ID Number (if registered): FLD065680613 2. Date of form completion: SEPT. 27, 1999 @ 10:00 AM

3. General Information
Facility name or responsible party (if applicable): INTERNATIONAL PETROLEUM CORPORATION
Facility Owner or Operator, or Discharger: INTERNATIONAL PETROLEUM CORPORATION
Contact Person: GARRY R. ALLEN Telephone Number: (813) 754-1504 County: HILLSBOROUGH
Facility or Discharger Mailing Address: 105 S. ALEXANDER STREET
Location of Discharge (street address): 105 S. ALEXANDER STREET
Latitude and Longitude of Discharge (if known)

4. Date of receipt of test results or discovery of confirmed discharge: 9/24/99 month/day/year

5. Estimated number of gallons discharged: 1000+ GALLONS

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

7. Method of discovery (check all that apply)
[ ] Liquid detector (automatic or manual)
[ ] Vapor detector (automatic or manual)
[ ] Tightness test
[ ] Pressure test
[ ] Statistical Inventory Reconciliation
[ ] Internal inspection
[ ] Inventory control
[ ] Monitoring wells
[ ] Automatic tank gauging
[ ] Manual tank gauging
[ ] Closure/Closure Assessment
[ ] Groundwater analytical samples
[ ] Soil analytical tests or samples
[X] Visual observation
[ ] Other

8. Type of regulated substance discharged: (check one)
[ ] Unknown [ ] Used/waste oil [ ] Jet fuel [ ] Heating oil [ ] New/lube oil
[ ] Gasoline [ ] Aviation gas [ ] Diesel [ ] Kerosene [ ] Mineral acid
[ ] Hazardous substance - includes CERCLA substances from USTs above reportable quantities, pesticides, ammonia, chlorine, and derivatives (write in name or Chemical Abstract Service (CAS) number)
[X] Other ON SPECIFICATION USED OIL

9. Source of Discharge: (check all that apply)
[ ] Dispensing system [ ] Pipe [ ] Barge [ ] Pipeline [ ] Vehicle
[ ] Tank [ ] Fitting [ ] Tanker ship [X] Railroad tankcar [ ] Airplane
[ ] Unknown [ ] Valve failure [ ] Other Vessel [ ] Tank truck [ ] Drum
[ ] Other

10. Cause of the discharge: (check all that apply)
[ ] Loose connection [ ] Puncture [ ] Spill [ ] Collision [ ] Corrosion
[ ] Fire/explosion [ ] Overfill [ ] Human error [ ] Vehicle Accident [ ] Installation failure
[X] Other TO BE DETERMINED

11. Actions taken in response to the discharge: STOPPED DISCHARGE FROM RAILCAR. STARTED PUMPS TO PUMP UP SPILLED LIQUID. MOVED IN VACUUM TRUCK, PUMP TRUCKS, AND TRACTOR TRAILER PUMPING EQUIPMENT.

12. Comments: ON GOING REMOVAL OF CONTAMINATED SOIL/RAILROAD BALLAST ROCK IS CONTINUING. SKIMMING OF OIL FROM WETLANDS IS ON GOING. BOOMS WILL BE DEPLOYED IN WETLAND AREA.

13. Agencies notified (as applicable):
[X] State Warning Point 1-800 320-0519
[X] National Response Center 1-800-424-8802
[ ] Florida Marine Patrol (800) 342-5367
[ ] Fire Department
[X] DEP (district/person) JAMES DREGNE
[X] County Tanks Program

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

GARRY R. ALLEN
Printed Name of Owner, Operator or Authorized Representative, or Discharger

Signature of Owner, Operator or Authorized Representative, or Discharger

INTERNATIONAL PETROLEUM CORPORATION

TELECOPIER COVER PAGE

NAME: James Dregne

COMPANY: E.P.A. / D.E.P.

DATE: 9/27/99

SENT BY: Gaeey Allen

NUMBER OF PAGES (INCLUDING COVER): 2

TELECOPIER NUMBER: 744-6125

This facsimile contains PREVILEGED AND CONFIDENTIAL INFORMATION intended only for the use of the Addressee named above. If you are not the recipient of this facsimile, or the employee or agent responsible for delivering it to to the intended recipient, you are hereby notified that any dissemination or copying of this facsimile is strictly prohibited. If you have received this facsimile in error, please immediately notify us by telephone and return the original facsimile to us at the below address VIA the U.S. Postal Services. Thank you.

NOTES OR COMMENTS:

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

NAME: Dee

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

TELECOPIER NO.: (813) 754-3789

TELECOP.WK1

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

INTEROFFICE MEMORANDUM

Date: 28-Sep-1999 08:44am
From: Raoul Clarke TAL 850/488-0300
CLARKE_R@a1.epic1.dep.state.fl.us
Dept:
Tel No:

Subject: Re: Used Oil Spill- International Petroleum Corporation (IPC)

Jim,

Thanks for including me on the email. Please let me know how the clean up (and the inspection) goes. We have heard nothing from EPA. I sent a note to the National Oil Recyclers Asst. (NORA) asking if they had heard anymore on the issue. I'll let you know (but don't hold your breath).
See ya,
Raoul
==========
#I talked with Gary Allen, President of IPC, this morning. He reported that the
#company had a used oil spill on Friday afternoon at the facility's rail siding
#in Plant City. According to Mr. Allen, approximately one thousand gallons
#(1000) of on-spec used oil leaked from a railroad tanker car when a valve
#broke.
#
#Cleanup of the spill has continued since Friday. The contaminated soil is being
#excavated and is being placed in a roll-off. I contacted Chris Rossbach,
#Emergency Response) this morning. He said that he thought he would be sending
#Jeff Tobergte out there this morning. Roger Evans, Al Gephart, and I have an
#unannounced inspection (permitting & RCRA) scheduled at the facility for this
#Wednesday.
#
#REMINDER: During our last inspection, we cited IPC for not having secondary
#containment for their rail cars. We dropped enforcement for this violation on
#June 18, 1998, when the Department issued a Memorandum saying we should not
#take formal enforcement until we get clarification from EPA on what they mean
#by an "equivalent secondary containment system". I'm sure this spill would have
#not caused contamination at the site if they had secondary containment for the
#tanker rail cars.

#
#Maybe its time to ask EPA again what they mean by
"equivalent secondary
#containment system" in 40 CFR Part 279.45(d). Its been over
a year.
#
#

FLORIDA DEPARTMENT OF ENVIRONMENTAL PROTECTION

EMERGENCY RESPONSE INCIDENT INVESTIGATIVE REPORT

Incident Number:	County:	BER District:	Date of Incident:	Time of Incident:
99-04-0628	Hillsborough	4	9/24/99	1300

Location of Incident:
International Petroleum Corp., 105 S. Alexander St.

Nearest City/Town:	Latitude:	Longitude:
Plant City	28* 00' 42.1"	82* 08' 21.6"

Initial Report Received BER Office:	BER Employee Receiving Initial Report:	Date Initial Report Received:	Time Initial Report Received:
☐ Tallahassee ☒ Tampa	Jane Urquhart-Donnelly	9/24/99	0840

Incident Reported By:	Affiliation:	Phone Number (include area code):
Garry Allen	☐ SWP Int'l. Petrol. Corp.	813/754-1504

Address of Reporting Party (include city, state, & zip):	Alternate Phone Number:
105 S. Alexander St., Plant City FL 33566	

Date District Notified:	Time District Notified:	District Employee Receiving Report:	Another BER Office Requested:
9/24/99	0840	Jane Urquhart-Donnelly 813/744-6462	☐ Yes ☒ No (skip next line)

Date Aid Requested:	Time Aid Requested:	BER Office Rendering Assistance:	Employee Receiving Assistance Request:
N/A	N/A	N/A	N/A

BER Employee Responding:	Responding From (Town):	Response Date:	Response Time:	Arrival Date:	Arrival Time:
Jeff Tobergte	Tampa	9/24/99	0940	9/24/99	1003

Incident Description:
☐ UST Tank Leak ☐ Vehicle Accident
☐ AST Tank Leak ☐ Vessel Discharge
☐ Air Release ☐ AST Tank Overfill
☐ Valve Leak ☐ UST Tank Overfill
☐ Complaint ☐ Abandoned Drum(s)
☐ Dumping ☐ Vehicle Fuel Leak
☒ Spill ☐ Abandoned Container
☐ Fire ☐

BER Response:
☐ None
☐ Referral
☒ On-Scene
☐ Phone Only
☐ Follow-up Later
☐

Media Affected:
☐ Air
☒ Soil
☐ Ditch
☐ Beach
☐ Storm Drain
☐ Wells Nearby
☐ Ground Water
☐ Surface Water
☒ Impervious Surface
☒ wetlands area

Mode:
☐ Highway
☐ Waterway
☐ Residential
☒ Rail
☐ Rural
☐ Coastal
☒ Facility
☐ Pipeline
☐ Commercial
☐ Agricultural
☐

Response Actions
☒ Leak Stopped
☒ Soil Removed
☐ Samples Taken
☒ Absorbent Used
☐ Contractor Hired
☐ Fire Extinguished
☐ Photographs Taken
☐ Neutralized
☒ Booms/Dikes
☐ None Taken
☒ vac truck

Vehicle/Vessel Type: ☐ Automobile ☐ Pickup Truck ☐ Truck ☐ Semi Truck ☐ Tank Truck ☐ Cargo Trailer ☐ Barge ☐ Tank Vessel ☐ Commercial Vessel ☐ Recreational Vessel ☒ rail tank car

Facility Type: ☐ Commercial Storage ☒ Waste Storage ☐ Bulk Product ☐ Industrial (factory) ☐ Commercial (Store) ☐ Power Plant ☐ Service Station ☐ Automotive Shop ☐ Marina ☐

Make/Model of Vehicle or Vessel Name:	Tag # or Vessel Registration #:	Operator's Name:
rail car	ACFX79325	CSX

Facility Name:	Person in Charge of Facility:
Int'l. Petroleum Corp.	Garry R. Allen

# of Abandoned Drums:	Size of Drums (gallons):	Are Any Drums Leaking?	Overall Condition:	Color or Markings:
N/A	☐55 ☐5	☐ Yes (#:) ☐ No	☐ Good ☐ Fair ☐ Poor	(see narrative)

Substantial threat of discharge to the environment: ☐ No ☒ Yes

USCG Notified: ☒ NRC ☐ Mobile ☐ Tampa ☐ Miami ☐ Jacksonville

Date Notified:	Time Notified:	Name/Rank of Person in USCG Notified:	Phone Number (include area code):
9/27/99	1156	CPO Todd	☒800/424-8802.

Evacuation:	Total Area Evacuated:	Injuries:	Fatalities:
☐ Yes ☒ No		☐ Yes (#:) ☒ No	☐ Yes (#:) ☒ No

Was There a Release:	Containment Initiated:	Was Release Contained:	Was Cleanup Initiated:
☒ Yes (amount: ~1000 gal) ☐ No	☒ Yes ☐ No ☐ N/A	☒ Yes ☐ No ☐ N/A	☒ Yes ☐ No ☐ N/A

Predicted Movement of Release: ☐ N/A
valve leak on rail car; used oil spilled onto rail tracks, asphalt pavement, and flowed south into wetland area on the property.

Brief Description of Type of Containment and Cleanup Efforts Being Taken: ☐ N/A
RP used its own spill equipment and personnel; sorbents were applied, and vacuum truck used to retrieve spillage.

Material:	Amount:	Category Code (see below)
used motor oil	~1000 ☒ gal. ☐ lbs.	01
	☐ gal. ☐ lbs.	
	☐ gal. ☐ lbs.	
	☐ gal. ☐ lbs.	
	☐ gal. ☐ lbs.	

Category Codes (choose one, most specific category for each material above, and enter the code on the appropriate box):

01 Oil	05 Paint	09 Chlorine	13 Oxidizer	17 Sewage	21 PCB
02 Fuel	06 Solvent	10 Ammonia	14 Reactive	18 Wastewater	22 Fertilizer
03 Crude Oil	07 Flammable (misc)	11 Gas (not NH_3 or CL_2)	15 Explosive	19 Radioactive	23 Biohazard
04 Petroleum (misc)	08 Poison (misc)	12 Pesticide/Herbicide	16 Corrosive	20 Solid Waste	24 Unknown
25					

Amount Determined By:

☐ Flow Rate Analysis ☐ Tank Inventory Records ☐ Witness Statements ☐ Manifest/Shipping Papers
☐ Investigator's Estimate ☐ Product Transfer Records ☒ Responsible Party Statements ☐

Responding Agencies:

☐ EPA ☐ FMP ☐ USCG ☐ Police/Sheriff
☐ FHP ☐ GFC ☐ Local EM ☐ Local Program
☐ HRS ☐ DOT ☐ Fire Dept. ☐ Local Road Dept.
☐ ☐

Agencies Notified:

☒ EPA ☐ GFC ☒ NRC ☐ Local EM
☒ SWP ☐ FMP ☐ TBER ☐ Local Program
☐ HRS ☐ DOT ☒ USCG ☐ Local Road Dept.
☐ ☐

Samples Taken:	Type Samples Taken:	Photographs Taken:	Media Coverage	Cleanup Contractor Used:
☐ Yes ☒ No	☐ Soil ☐ Water ☐ Waste ☐	☐ Yes ☒ No	☐ Yes ☒ No	☐ Yes ☒ No

Contractor's Name: | Phone Number (include area code):

Contractor's Address (include city, state, and zip): | Alternate Phone Number:

Contractor Hired By:	DEP Contract Number:	Responsible Party Assumed Responsibility:
☐ Responsible Party ☐ DEP ☐	N/A	☒ Yes ☐ No ☐ N/A

Name of Responsible Party For Incident (if facility, give facility name and contact name): **Intgernational Petroleum Corp. (IPC) Garry R. Allen** | Phone Number (include area code): **800/282-9585**

Responsible Party's Mailing Address (include city, state, and zip code): **105 S. Alexander St., Plant City FL 33566** | Alternate Phone Number: **813/754-1504**

Owner's Name (if facility, give facility name and contact name): **same as RP, above** | Phone Number (include area code):

Owner's Mailing Address (include city, state, and zip code): | Alternate Phone Number:

Technical Assistance Only: ☐ Yes ☒ No

Justification for Waiving of Cost Recovery (Attach supporting documents and/or narrative): ☐ Act of God ☐ Third Party Defense ☐ Non-pollutant ☐ Act of Government ☐ Act of War

Special Management Area(s) Affected:

☐ Yes
☒ No

Special management areas are: state parks; recreation areas; national parks; seashores; estuarine research reserves; marine sanctuaries; wildlife refuges; national estuary program waterbodies; state aquatic preserves and reserves; classified shellfish harvesting areas; areas of critical state concern; federally designated critical habitat for endangered or threatened species; and outstanding Florida waterbodies.

Name(s) of Special Management Area(s) Affected:

N/A

Enforcement Action Taken/Pending:	Type of Enforcement Action:	Lead Agency in Enforcement Action:
☐ Yes ☒ No	☐ Criminal ☐ Civil	

Offense Description:	Statute Number for Violation:
1. 2.	1. 2.

Issued to:	Citation/Warning Number:	Copy of Citation/Warning Attached:
1. ☐ Responsible Party ☐ Owner ☐ 2. ☐ Responsible Party ☐ Owner ☐	1. 2.	1. ☐ Yes ☐ No ☐ N/A 2. ☐ Yes ☐ No ☐ N/A

Brief cursory overview of any environmental impact (include size and characteristics of affected area; damage to wildlife, habitats, etc.; and areas threatened by release movement) (include sketch if applicable): ☐ Extent of Damage Unknown at this Time

ADMINISTRATIVE COSTS AND EXPENSES INCURRED DURING INVESTIGATION

Vehicle(s) Used: ☒ Yes ☐ No	Total Miles: 38	Single Engine Boat(s) Used: ☐ Yes ☒ No	Total Hours: N/A	Twin Engine Boat(s) Used: ☐ Yes ☒ No	Total Hours: N/A
Helicopter Used ☐ Yes ☒ No	Total Hours: N/A	Single Engine Aircraft Used: ☐ Yes ☒ No	Total Hours: N/A	Twin Engine Aircraft Used: ☐ Yes ☒ No	Total Hours: N/A

PID Used ☐ Yes ☒ No	Total Hours:	HazCat Used: ☐ Yes ☒ No	Total Samples:	BER Absorbent Pads Used: ☐ Yes ☒ No	Total # Pads Used: N/A	BER Granular Absorbent Used: ☐ Yes ☒ No	Total # Bags Used: N/A

Other BER Equipment Used ☐ Yes ☒ No	Equipment Description and Cost: N/A $ N/A $ $	Lost or Damaged DEP Equipment: ☐ Yes ☒ No	Equipment Description and Cost: $ $

Names of All BER/DEP Personnel Involved (include yourself) Jeff Tobergte	Hours Involved 2	Names of All BER/DEP Personnel Involved (include yourself)	Hours Involved

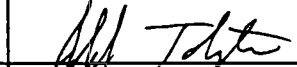
Laboratory Analysis ☐ Yes ☒ No	Cost of Analysis N/A	Photographs Taken: ☐ Yes ☒ No	Cost (film, developing,etc): N/A	Telephone Calls: ☐ Yes ☒ No	Cost of Calls: N/A

Per Diem Expenses Incurred (all DEP personnel): ☒ No ☐ Yes (attach copy of expenses incurred)	Total Cost N/A	Services rendered by other personnel (biologists, surveyors, etc.): ☒ No ☐ Yes (attach copies of invoices)	Total Cost: N/A

Total Clerical Hours Expended: 0.5	Other Non-Specified Expenses Incurred: ☐ Yes ☒ No	Description and Cost of Other Expenses Incurred (include emergency purchase orders, etc.) (attach copy of invoices): Exclude regular contractor expenses covered by a work authorization number N/A $ $

Narrative (expand on areas that need more details; include any information not covered, that you deem necessary; use continuation form if necessary):

On 9/27/99 (0840), BER received a call from Garry Allen, of International Petroleum Corp. (IPC; Plant City), reporting a spill of about 1000 gallons of used motor oil from a rail car. The spill occurred on 9/24/99, at IPC's used oil storage/recycling facility. I responded on 9/27, and met with Mr. Allen, who said that, on 9/24 at about 1300 hours, they were unloading a rail car containing on-spec used motor oil that had arrived via rail car from SafetyKleen (Ft. Lauderdale). The bottom valve stuck open, and about 1000 gallons of used oil spilled out before the workers could get a lever bar to force the valve closed. Oil flowed onto the rail tracks, asphalt pavement, and south into a wetlands area on IPC's property. IPC personnel used sorbents and a vac truck to retrieve oil. Most of the spillage had been cleaned up by 9/27, but work was still continuing on the wetlands area. Mr. Allen estimated that about 350 gallons entered the wetlands area (which had standing water). He notified Jim Dregne (DEP Hazardous Waste Section, Tampa). The cleanup will progress until the site is clean, per Mr. Allen. I told him that BER will close its case, and refer the case to the HW Section for any followup.

BER Investigator's Name (please print):	Investigator's Signature:	Date Completed:
Jeff Tobergte H65		9/29/99
Name of Reviewing Supervisor (please print):	Supervisor's Signature:	Date Completed:
Chris H. Rossbach E44		9/29/99

District Bureau of Emergency Response Endorsement	Tallahassee Bureau of Emergency Response Endorsement
CLOSED **Florida Department of Environmental Protection** **Bureau of Emergency Response** **Date: 9/29/99** **Closed By:**  **Title:** Environmental Manager	

IES
INTERNATIONAL ENVIRONMENTAL SERVICES, INC.
105 South Alexander St. • Plant City, Florida 33566 • (813) 754-1504
FAX (813) 754-3789

CERTIFIED ANALYSIS

CLIENT INFORMATON

CLIENT NAME:	IPC, GARRY ALLEN
CLIENT SAMPLE ID:	TANK 552 (DAILY)
SAMPLED BY:	Anthony Piotrowski
SAMPLE DATE:	12/30/99
SAMPLE TIME:	08:00hrs
SAMPLE TYPE:	RE-REFINED OIL
IES CONTROL NUMBER:	990680

RESULT INFORMATION

ANALYTE	METHOD	DATE	RESULTS	MDL*	UNITS
FLASH POINT	EPA-110	12/30/99	225	N/A	^0F +/- 2^0
ARSENIC	EPA-6010A	12/30/99	.323	0.3	mg/Kg
CADMIUM	EPA-6010A	12/30/99	.376	0.04	mg/Kg
CHROMIUM	EPA-6010A	12/30/99	1.69	0.03	mg/Kg
LEAD	EPA-6010A	12/30/99	32.9	0.5	mg/Kg
PCB's	EPA-608	12/30/99	BDL	2.00	mg/Kg
TOTAL HALIDES (TX)	EPA-9076	12/30/99	304	0.10	mg/Kg

MDL* : METHOD DETECTON LIMIT
BDL : BELOW DETECTION LIMIT

Certified by: _____ Analyst

Certified by: _____ Q.A. Officer

State of Florida Certification: E84160 COMQAP: 870319G

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CERTIFIED ANALYSIS

CLIENT INFORMATON

CLIENT NAME:	IPC, GARRY ALLEN
CLIENT SAMPLE ID:	TANK 552 (DAILY)
SAMPLED BY:	Anthony Piotrowski
SAMPLE DATE:	12/29/99
SAMPLE TIME:	08:00hrs
SAMPLE TYPE:	RE-REFINED OIL
IES CONTROL NUMBER:	990679

RESULT INFORMATION

ANALYTE	METHOD	DATE	RESULTS	MDL*	UNITS
FLASH POINT	EPA-110	12/29/99	230	N/A	^{0}F +/- 2^0
ARSENIC	EPA-6010A	12/29/99	.300	0.3	mg/Kg
CADMIUM	EPA-6010A	12/29/99	.363	0.04	mg/Kg
CHROMIUM	EPA-6010A	12/29/99	1.64	0.03	mg/Kg
LEAD	EPA-6010A	12/29/99	31.8	0.5	mg/Kg
PCB's	EPA-608	12/29/99	BDL	2.00	mg/Kg
TOTAL HALIDES (TX)	EPA-9076	12/29/99	323	0.10	mg/Kg

MDL* : METHOD DETECTON LIMIT
BDL : BELOW DETECTION LIMIT

Certified by: _____ Analyst

Certified by: _____ Q.A. Officer

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CERTIFIED ANALYSIS

CLIENT INFORMATON

CLIENT NAME:	IPC, GARRY ALLEN
CLIENT SAMPLE ID:	TANK 552 (DAILY)
SAMPLED BY:	Anthony Piotrowski
SAMPLE DATE:	12/28/99
SAMPLE TIME:	08:00hrs
SAMPLE TYPE:	RE-REFINED OIL
IES CONTROL NUMBER:	990677

RESULT INFORMATION

ANALYTE	METHOD	DATE	RESULTS	MDL*	UNITS
FLASH POINT	EPA-110	12/28/99	225	N/A	^{0}F +/- 2^0
ARSENIC	EPA-6010A	12/28/99	.346	0.3	mg/Kg
CADMIUM	EPA-6010A	12/28/99	.360	0.04	mg/Kg
CHROMIUM	EPA-6010A	12/28/99	1.53	0.03	mg/Kg
LEAD	EPA-6010A	12/28/99	31.4	0.5	mg/Kg
PCB's	EPA-608	12/28/99	BDL	2.00	mg/Kg
TOTAL HALIDES (TX)	EPA-9076	12/28/99	346	0.10	mg/Kg

MDL* : METHOD DETECTON LIMIT
BDL : BELOW DETECTION LIMIT

Certified by: _____ Analyst

Certified by: _____ Q.A. Officer

State of Florida Certification: E84160 COMQAP: 870319G

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CERTIFIED ANALYSIS

CLIENT INFORMATON

CLIENT NAME:	IPC, GARRY ALLEN
CLIENT SAMPLE ID:	TANK 552 (DAILY)
SAMPLED BY:	Anthony Piotrowski
SAMPLE DATE:	12/27/99
SAMPLE TIME:	08:00hrs
SAMPLE TYPE:	RE-REFINED OIL
IES CONTROL NUMBER:	990672

RESULT INFORMATION

ANALYTE	METHOD	DATE	RESULTS	MDL*	UNITS
FLASH POINT	EPA-110	12/27/99	225	N/A	^0F +/- 2^0
ARSENIC	EPA-6010A	12/27/99	.434	0.3	mg/Kg
CADMIUM	EPA-6010A	12/27/99	.339	0.04	mg/Kg
CHROMIUM	EPA-6010A	12/27/99	1.62	0.03	mg/Kg
LEAD	EPA-6010A	12/27/99	31.0	0.5	mg/Kg
PCB's	EPA-608	12/27/99	BDL	2.00	mg/Kg
TOTAL HALIDES (TX)	EPA-9076	12/27/99	273	0.10	mg/Kg

MDL* : METHOD DETECTON LIMIT
BDL : BELOW DETECTION LIMIT

Certified by: _____ Analyst

Certified by: _____ Q.A. Officer

State of Florida Certification: E84160 COMQAP: 870319G

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CERTIFIED ANALYSIS

CLIENT INFORMATON

CLIENT NAME:	IPC, GARRY ALLEN
CLIENT SAMPLE ID:	TANK 552 (DAILY)
SAMPLED BY:	Anthony Piotrowski
SAMPLE DATE:	12/23/99
SAMPLE TIME:	08:00hrs
SAMPLE TYPE:	RE-REFINED OIL
IES CONTROL NUMBER:	990670

RESULT INFORMATION

ANALYTE	METHOD	DATE	RESULTS	MDL*	UNITS
FLASH POINT	EPA-110	12/23/99	225	N/A	^{0}F +/- 2^0
ARSENIC	EPA-6010A	12/23/99	.346	0.3	mg/Kg
CADMIUM	EPA-6010A	12/23/99	.349	0.04	mg/Kg
CHROMIUM	EPA-6010A	12/23/99	1.52	0.03	mg/Kg
LEAD	EPA-6010A	12/23/99	31.4	0.5	mg/Kg
PCB's	EPA-608	12/23/99	BDL	2.00	mg/Kg
TOTAL HALIDES (TX)	EPA-9076	12/23/99	287	0.10	mg/Kg

MDL* : METHOD DETECTON LIMIT
BDL : BELOW DETECTION LIMIT

Certified by: _____ Analyst

Certified by: _____ Q.A. Officer

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CERTIFIED ANALYSIS

CLIENT INFORMATON

CLIENT NAME:	IPC, GARRY ALLEN
CLIENT SAMPLE ID:	TANK 552 (DAILY)
SAMPLED BY:	Anthony Piotrowski
SAMPLE DATE:	12/22/99
SAMPLE TIME:	08:00hrs
SAMPLE TYPE:	RE-REFINED OIL
IES CONTROL NUMBER:	990669

RESULT INFORMATION

ANALYTE	METHOD	DATE	RESULTS	MDL*	UNITS
FLASH POINT	EPA-110	12/22/99	218	N/A	^{0}F +/- 2^0
ARSENIC	EPA-6010A	12/22/99	BDL	0.3	mg/Kg
CADMIUM	EPA-6010A	12/22/99	.356	0.04	mg/Kg
CHROMIUM	EPA-6010A	12/22/99	1.56	0.03	mg/Kg
LEAD	EPA-6010A	12/22/99	31.9	0.5	mg/Kg
PCB's	EPA-608	12/22/99	BDL	2.00	mg/Kg
TOTAL HALIDES (TX)	EPA-9076	12/22/99	320	0.10	mg/Kg

MDL* : METHOD DETECTON LIMIT
BDL : BELOW DETECTION LIMIT

Certified by: _____ Analyst

Certified by: _____ Q.A. Officer

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CERTIFIED ANALYSIS

CLIENT INFORMATON

CLIENT NAME:	IPC, GARRY ALLEN
CLIENT SAMPLE ID:	TANK 552 (DAILY)
SAMPLED BY:	Anthony Piotrowski
SAMPLE DATE:	12/21/99
SAMPLE TIME:	08:00hrs
SAMPLE TYPE:	RE-REFINED OIL
IES CONTROL NUMBER:	990664

RESULT INFORMATION

ANALYTE	METHOD	DATE	RESULTS	MDL*	UNITS
FLASH POINT	EPA-110	12/21/99	185	N/A	$^0F +/- 2^0$
ARSENIC	EPA-6010A	12/21/99	.404	0.3	mg/Kg
CADMIUM	EPA-6010A	12/21/99	.322	0.04	mg/Kg
CHROMIUM	EPA-6010A	12/21/99	1.32	0.03	mg/Kg
LEAD	EPA-6010A	12/21/99	29.1	0.5	mg/Kg
PCB's	EPA-608	12/21/99	BDL	2.00	mg/Kg
TOTAL HALIDES (TX)	EPA-9076	12/21/99	260	0.10	mg/Kg

MDL* : METHOD DETECTON LIMIT
BDL : BELOW DETECTION LIMIT

Certified by: _____ Analyst

Certified by: _____ Q.A. Officer

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CLIENT INFORMATON

CLIENT NAME:	IPC, GARRY ALLEN
CLIENT SAMPLE ID:	TANK 552 (DAILY)
SAMPLED BY:	Anthony Piotrowski
SAMPLE DATE:	12/20/99
SAMPLE TIME:	08:00hrs
SAMPLE TYPE:	RE-REFINED OIL
IES CONTROL NUMBER:	990657

RESULT INFORMATION

ANALYTE	METHOD	DATE	RESULTS	MDL*	UNITS
FLASH POINT	EPA-110	12/20/99	227	N/A	^0F +/- 2^0
ARSENIC	EPA-6010A	12/20/99	.298	0.3	mg/Kg
CADMIUM	EPA-6010A	12/20/99	.442	0.04	mg/Kg
CHROMIUM	EPA-6010A	12/20/99	1.66	0.03	mg/Kg
LEAD	EPA-6010A	12/20/99	35.1	0.5	mg/Kg
PCB's	EPA-608	12/20/99	BDL	2.00	mg/Kg
TOTAL HALIDES (TX)	EPA-9076	12/20/99	384	0.10	mg/Kg

MDL* : METHOD DETECTON LIMIT
BDL : BELOW DETECTION LIMIT

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Certified by: _____ Q.A. Officer

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CLIENT INFORMATON

CLIENT NAME:	IPC, GARRY ALLEN
CLIENT SAMPLE ID:	TANK 552 (DAILY)
SAMPLED BY:	Anthony Piotrowski
SAMPLE DATE:	12/17/99
SAMPLE TIME:	08:00hrs
SAMPLE TYPE:	RE-REFINED OIL
IES CONTROL NUMBER:	990656

RESULT INFORMATION

ANALYTE	METHOD	DATE	RESULTS	MDL*	UNITS
FLASH POINT	EPA-110	12/17/99	225	N/A	^0F +/- 2^0
ARSENIC	EPA-6010A	12/17/99	.307	0.3	mg/Kg
CADMIUM	EPA-6010A	12/17/99	.419	0.04	mg/Kg
CHROMIUM	EPA-6010A	12/17/99	1.59	0.03	mg/Kg
LEAD	EPA-6010A	12/17/99	32.5	0.5	mg/Kg
PCB's	EPA-608	12/17/99	BDL	2.00	mg/Kg
TOTAL HALIDES (TX)	EPA-9076	12/17/99	283	0.10	mg/Kg

MDL* : METHOD DETECTON LIMIT
BDL : BELOW DETECTION LIMIT

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State of Florida Certification: E84160 COMQAP: 870319G

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CERTIFIED ANALYSIS

CLIENT INFORMATON

CLIENT NAME:	IPC, GARRY ALLEN
CLIENT SAMPLE ID:	TANK 552 (DAILY)
SAMPLED BY:	Anthony Piotrowski
SAMPLE DATE:	12/16/99
SAMPLE TIME:	08:00hrs
SAMPLE TYPE:	RE-REFINED OIL
IES CONTROL NUMBER:	990655

RESULT INFORMATION

ANALYTE	METHOD	DATE	RESULTS	MDL*	UNITS
FLASH POINT	EPA-110	12/16/99	190	N/A	^0F +/- 2^0
ARSENIC	EPA-6010A	12/16/99	.568	0.3	mg/Kg
CADMIUM	EPA-6010A	12/16/99	.422	0.04	mg/Kg
CHROMIUM	EPA-6010A	12/16/99	1.55	0.03	mg/Kg
LEAD	EPA-6010A	12/16/99	32.4	0.5	mg/Kg
PCB's	EPA-608	12/16/99	BDL	2.00	mg/Kg
TOTAL HALIDES (TX)	EPA-9076	12/16/99	342	0.10	mg/Kg

MDL* : METHOD DETECTON LIMIT
BDL : BELOW DETECTION LIMIT

Certified by: _____ Analyst

Certified by: _____ Q.A. Officer

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CERTIFIED ANALYSIS

CLIENT INFORMATON

CLIENT NAME:	IPC, GARRY ALLEN
CLIENT SAMPLE ID:	TANK 552 (DAILY)
SAMPLED BY:	Anthony Piotrowski
SAMPLE DATE:	12/15/99
SAMPLE TIME:	08:00hrs
SAMPLE TYPE:	RE-REFINED OIL
IES CONTROL NUMBER:	990647

RESULT INFORMATION

ANALYTE	METHOD	DATE	RESULTS	MDL*	UNITS
FLASH POINT	EPA-110	12/15/99	225	N/A	^0F +/- 2^0
ARSENIC	EPA-6010A	12/15/99	.550	0.3	mg/Kg
CADMIUM	EPA-6010A	12/15/99	.412	0.04	mg/Kg
CHROMIUM	EPA-6010A	12/15/99	1.52	0.03	mg/Kg
LEAD	EPA-6010A	12/15/99	30.4	0.5	mg/Kg
PCB's	EPA-608	12/15/99	BDL	2.00	mg/Kg
TOTAL HALIDES (TX)	EPA-9076	12/15/99	333	0.10	mg/Kg

MDL* : METHOD DETECTON LIMIT
BDL : BELOW DETECTION LIMIT

Certified by: _____ Analyst

Certified by: _____ Q.A. Officer

State of Florida Certification: E84160 COMQAP: 870319G

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CERTIFIED ANALYSIS

CLIENT INFORMATON

CLIENT NAME:	IPC, GARRY ALLEN
CLIENT SAMPLE ID:	TANK 552 (DAILY)
SAMPLED BY:	Anthony Piotrowski
SAMPLE DATE:	12/14/99
SAMPLE TIME:	08:00hrs
SAMPLE TYPE:	RE-REFINED OIL
IES CONTROL NUMBER:	990661

RESULT INFORMATION

ANALYTE	METHOD	DATE	RESULTS	MDL*	UNITS
FLASH POINT	EPA-110	12/14/99	225	N/A	^0F +/- 2^0
ARSENIC	EPA-6010A	12/14/99	.361	0.3	mg/Kg
CADMIUM	EPA-6010A	12/14/99	.415	0.04	mg/Kg
CHROMIUM	EPA-6010A	12/14/99	1.60	0.03	mg/Kg
LEAD	EPA-6010A	12/14/99	29.8	0.5	mg/Kg
PCB's	EPA-608	12/14/99	BDL	2.00	mg/Kg
TOTAL HALIDES (TX)	EPA-9076	12/14/99	279	0.10	mg/Kg

MDL* : METHOD DETECTON LIMIT
BDL : BELOW DETECTION LIMIT

Certified by: _____ Analyst

Certified by: _____ Q.A. Officer

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CERTIFIED ANALYSIS

CLIENT INFORMATON

CLIENT NAME:	IPC, GARRY ALLEN
CLIENT SAMPLE ID:	TANK 552 (DAILY)
SAMPLED BY:	Anthony Piotrowski
SAMPLE DATE:	12/13/99
SAMPLE TIME:	08:00hrs
SAMPLE TYPE:	RE-REFINED OIL
IES CONTROL NUMBER:	990634

RESULT INFORMATION

ANALYTE	METHOD	DATE	RESULTS	MDL*	UNITS
FLASH POINT	EPA-110	12/13/99	222	N/A	^{0}F +/- 2^0
ARSENIC	EPA-6010A	12/13/99	BDL	0.3	mg/Kg
CADMIUM	EPA-6010A	12/13/99	.354	0.04	mg/Kg
CHROMIUM	EPA-6010A	12/13/99	1.56	0.03	mg/Kg
LEAD	EPA-6010A	12/13/99	28.5	0.5	mg/Kg
PCB's	EPA-608	12/13/99	BDL	2.00	mg/Kg
TOTAL HALIDES (TX)	EPA-9076	12/13/99	371	0.10	mg/Kg

MDL* : METHOD DETECTON LIMIT
BDL : BELOW DETECTION LIMIT

Certified by: _____ Analyst

Certified by: _____ Q.A. Officer

State of Florida Certification: E84160 COMQAP: 870319G

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CERTIFIED ANALYSIS

CLIENT INFORMATON

CLIENT NAME:	IPC, GARRY ALLEN
CLIENT SAMPLE ID:	TANK 552 (DAILY)
SAMPLED BY:	Anthony Piotrowski
SAMPLE DATE:	12/10/99
SAMPLE TIME:	08:00hrs
SAMPLE TYPE:	RE-REFINED OIL
IES CONTROL NUMBER:	990631

RESULT INFORMATION

ANALYTE	METHOD	DATE	RESULTS	MDL*	UNITS
FLASH POINT	EPA-110	12/10/99	230^{+}	N/A	$^{0}F +/- 2^{0}$
ARSENIC	EPA-6010A	12/10/99	BDL	0.3	mg/Kg
CADMIUM	EPA-6010A	12/10/99	.334	0.04	mg/Kg
CHROMIUM	EPA-6010A	12/10/99	1.55	0.03	mg/Kg
LEAD	EPA-6010A	12/10/99	26.4	0.5	mg/Kg
PCB's	EPA-608	12/10/99	BDL	2.00	mg/Kg
TOTAL HALIDES (TX)	EPA-9076	12/10/99	375	0.10	mg/Kg

MDL* : METHOD DETECTON LIMIT
BDL : BELOW DETECTION LIMIT

Certified by: _____ Analyst

Certified by: _____ Q.A. Officer

State of Florida Certification: E84160 COMQAP: 870319G

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FAX (813) 754-3789

CERTIFIED ANALYSIS

CLIENT INFORMATON

CLIENT NAME:	IPC, GARRY ALLEN
CLIENT SAMPLE ID:	TANK 552 (DAILY)
SAMPLED BY:	Anthony Piotrowski
SAMPLE DATE:	12/09/99
SAMPLE TIME:	08:00hrs
SAMPLE TYPE:	RE-REFINED OIL
IES CONTROL NUMBER:	990628

RESULT INFORMATION

ANALYTE	METHOD	DATE	RESULTS	MDL*	UNITS
FLASH POINT	EPA-110	12/09/99	225	N/A	^{0}F +/- 2^0
ARSENIC	EPA-6010A	12/09/99	BDL	0.3	mg/Kg
CADMIUM	EPA-6010A	12/09/99	.346	0.04	mg/Kg
CHROMIUM	EPA-6010A	12/09/99	1.64	0.03	mg/Kg
LEAD	EPA-6010A	12/09/99	27.4	0.5	mg/Kg
PCB's	EPA-608	12/09/99	BDL	2.00	mg/Kg
TOTAL HALIDES (TX)	EPA-9076	12/09/99	345	0.10	mg/Kg

MDL* : METHOD DETECTON LIMIT
BDL : BELOW DETECTION LIMIT

Certified by: _____ Analyst

Certified by: _____ Q.A. Officer

State of Florida Certification: E84160 COMQAP: 870319G

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FAX (813) 754-3789

CERTIFIED ANALYSIS

CLIENT INFORMATON

CLIENT NAME:	IPC, GARRY ALLEN
CLIENT SAMPLE ID:	TANK 552 (DAILY)
SAMPLED BY:	Anthony Piotrowski
SAMPLE DATE:	12/08/99
SAMPLE TIME:	08:00hrs
SAMPLE TYPE:	RE-REFINED OIL
IES CONTROL NUMBER:	990626

RESULT INFORMATION

ANALYTE	METHOD	DATE	RESULTS	MDL*	UNITS
FLASH POINT	EPA-110	12/08/99	220	N/A	$^0F +/- 2^0$
ARSENIC	EPA-6010A	12/08/99	BDL	0.3	mg/Kg
CADMIUM	EPA-6010A	12/08/99	.343	0.04	mg/Kg
CHROMIUM	EPA-6010A	12/08/99	1.55	0.03	mg/Kg
LEAD	EPA-6010A	12/08/99	26.4	0.5	mg/Kg
PCB's	EPA-608	12/08/99	BDL	2.00	mg/Kg
TOTAL HALIDES (TX)	EPA-9076	12/08/99	375	0.10	mg/Kg

MDL* : METHOD DETECTON LIMIT
BDL : BELOW DETECTION LIMIT

Certified by: _____ Analyst

Certified by: _____ Q.A. Officer

State of Florida Certification: E84160 COMQAP: 870319G

INTERNATIONAL ENVIRONMENTAL SERVICES, INC.
IES
105 South Alexander St. • Plant City, Florida 33566 • (813) 754-1504
FAX (813) 754-3789

CERTIFIED ANALYSIS

CLIENT INFORMATON

CLIENT NAME:	IPC, GARRY ALLEN
CLIENT SAMPLE ID:	TANK 552 (DAILY)
SAMPLED BY:	Anthony Piotrowski
SAMPLE DATE:	12/07/99
SAMPLE TIME:	08:00hrs
SAMPLE TYPE:	RE-REFINED OIL
IES CONTROL NUMBER:	990625

RESULT INFORMATION

ANALYTE	METHOD	DATE	RESULTS	MDL*	UNITS
FLASH POINT	EPA-110	12/07/99	218	N/A	$^0F +/- 2^0$
ARSENIC	EPA-6010A	12/07/99	BDL	0.3	mg/Kg
CADMIUM	EPA-6010A	12/07/99	.338	0.04	mg/Kg
CHROMIUM	EPA-6010A	12/07/99	1.57	0.03	mg/Kg
LEAD	EPA-6010A	12/07/99	26.8	0.5	mg/Kg
PCB's	EPA-608	12/07/99	BDL	2.00	mg/Kg
TOTAL HALIDES (TX)	EPA-9076	12/07/99	421	0.10	mg/Kg

MDL* : METHOD DETECTON LIMIT
BDL : BELOW DETECTION LIMIT

Certified by: _____ Analyst

Certified by: _____ Q.A. Officer

State of Florida Certification: E84160 COMQAP: 870319G

IES
INTERNATIONAL ENVIRONMENTAL SERVICES, INC.
105 South Alexander St. • Plant City, Florida 33566 • (813) 754-1504
FAX (813) 754-3789

CERTIFIED ANALYSIS

CLIENT INFORMATON

CLIENT NAME:	IPC, GARRY ALLEN
CLIENT SAMPLE ID:	TANK 552 (DAILY)
SAMPLED BY:	Anthony Piotrowski
SAMPLE DATE:	12/06/99
SAMPLE TIME:	08:00hrs
SAMPLE TYPE:	RE-REFINED OIL
IES CONTROL NUMBER:	990615

RESULT INFORMATION

ANALYTE	METHOD	DATE	RESULTS	MDL*	UNITS
FLASH POINT	EPA-110	12/06/99	228	N/A	^{0}F +/- 2^0
ARSENIC	EPA-6010A	12/06/99	.524	0.3	mg/Kg
CADMIUM	EPA-6010A	12/06/99	.381	0.04	mg/Kg
CHROMIUM	EPA-6010A	12/06/99	1.60	0.03	mg/Kg
LEAD	EPA-6010A	12/06/99	27.9	0.5	mg/Kg
PCB's	EPA-608	12/06/99	BDL	2.00	mg/Kg
TOTAL HALIDES (TX)	EPA-9076	12/06/99	300	0.10	mg/Kg

MDL* : METHOD DETECTON LIMIT
BDL : BELOW DETECTION LIMIT

Certified by: _____ Analyst

Certified by: _____ Q.A. Officer

State of Florida Certification: E84160 COMQAP: 870319G

IES
INTERNATIONAL ENVIRONMENTAL SERVICES, INC.
105 South Alexander St. • Plant City, Florida 33566 • (813) 754-1504
FAX (813) 754-3789

CERTIFIED ANALYSIS

CLIENT INFORMATON

CLIENT NAME:	IPC, GARRY ALLEN
CLIENT SAMPLE ID:	TANK 552 (DAILY)
SAMPLED BY:	Anthony Piotrowski
SAMPLE DATE:	12/03/99
SAMPLE TIME:	08:00hrs
SAMPLE TYPE:	RE-REFINED OIL
IES CONTROL NUMBER:	990618

RESULT INFORMATION

ANALYTE	METHOD	DATE	RESULTS	MDL*	UNITS
FLASH POINT	EPA-110	12/03/99	228	N/A	^0F +/- 2^0
ARSENIC	EPA-6010A	12/03/99	.486	0.3	mg/Kg
CADMIUM	EPA-6010A	12/03/99	.387	0.04	mg/Kg
CHROMIUM	EPA-6010A	12/03/99	1.58	0.03	mg/Kg
LEAD	EPA-6010A	12/03/99	29.5	0.5	mg/Kg
PCB's	EPA-608	12/03/99	BDL	2.00	mg/Kg
TOTAL HALIDES (TX)	EPA-9076	12/03/99	412	0.10	mg/Kg

MDL* : METHOD DETECTON LIMIT
BDL : BELOW DETECTION LIMIT

Certified by: _____ Analyst Certified by: _____ Q.A. Officer

State of Florida Certification: E84160 COMQAP: 870319G

IES
INTERNATIONAL ENVIRONMENTAL SERVICES, INC.
105 South Alexander St. • Plant City, Florida 33566 • (813) 754-1504
FAX (813) 754-3789

CERTIFIED ANALYSIS

CLIENT INFORMATON

CLIENT NAME:	IPC, GARRY ALLEN
CLIENT SAMPLE ID:	TANK 552 (DAILY)
SAMPLED BY:	Anthony Piotrowski
SAMPLE DATE:	12/02/99
SAMPLE TIME:	08:00hrs
SAMPLE TYPE:	RE-REFINED OIL
IES CONTROL NUMBER:	990607

RESULT INFORMATION

ANALYTE	METHOD	DATE	RESULTS	MDL*	UNITS
FLASH POINT	EPA-110	12/02/99	225	N/A	^0F +/- 2^0
ARSENIC	EPA-6010A	12/02/99	.835	0.3	mg/Kg
CADMIUM	EPA-6010A	12/02/99	.444	0.04	mg/Kg
CHROMIUM	EPA-6010A	12/02/99	1.65	0.03	mg/Kg
LEAD	EPA-6010A	12/02/99	34.4	0.5	mg/Kg
PCB's	EPA-608	12/02/99	BDL	2.00	mg/Kg
TOTAL HALIDES (TX)	EPA-9076	12/02/99	155	0.10	mg/Kg

MDL* : METHOD DETECTON LIMIT
BDL : BELOW DETECTION LIMIT

Certified by: _____ Analyst

Certified by: _____ Q.A. Officer

State of Florida Certification: E84160 COMQAP: 870319G

INTERNATIONAL ENVIRONMENTAL SERVICES, INC.
105 South Alexander St. • Plant City, Florida 33566 • (813) 754-1504
FAX (813) 754-3789

CERTIFIED ANALYSIS

CLIENT INFORMATON

CLIENT NAME:	IPC, GARRY ALLEN
CLIENT SAMPLE ID:	TANK 552 (DAILY)
SAMPLED BY:	Anthony Piotrowski
SAMPLE DATE:	12/01/99
SAMPLE TIME:	08:00hrs
SAMPLE TYPE:	RE-REFINED OIL
IES CONTROL NUMBER:	990603

RESULT INFORMATION

ANALYTE	METHOD	DATE	RESULTS	MDL*	UNITS
FLASH POINT	EPA-110	12/01/99	230^{+}	N/A	$^{0}F +/- 2^{0}$
ARSENIC	EPA-6010A	12/01/99	.738	0.3	mg/Kg
CADMIUM	EPA-6010A	12/01/99	.469	0.04	mg/Kg
CHROMIUM	EPA-6010A	12/01/99	1.80	0.03	mg/Kg
LEAD	EPA-6010A	12/01/99	36.1	0.5	mg/Kg
PCB's	EPA-608	12/01/99	BDL	2.00	mg/Kg
TOTAL HALIDES (TX)	EPA-9076	12/01/99	273	0.10	mg/Kg

MDL* : METHOD DETECTON LIMIT
BDL : BELOW DETECTION LIMIT

Certified by: _____ Analyst

Certified by: _____ Q.A. Officer

State of Florida Certification: E84160 COMQAP: 870319G

IES
INTERNATIONAL ENVIRONMENTAL SERVICES, INC.
105 South Alexander St. • Plant City, Florida 33566 • (813) 754-1504
FAX (813) 754-3789

CERTIFIED ANALYSIS

CLIENT INFORMATON

CLIENT NAME:	IPC, GARRY ALLEN
CLIENT SAMPLE ID:	TANK 552 (DAILY)
SAMPLED BY:	Anthony Piotrowski
SAMPLE DATE:	11/30/99
SAMPLE TIME:	08:00hrs
SAMPLE TYPE:	RE-REFINED OIL
IES CONTROL NUMBER:	990602

RESULT INFORMATION

ANALYTE	METHOD	DATE	RESULTS	MDL*	UNITS
FLASH POINT	EPA-110	11/30/99	230^{+}	N/A	$^{0}F +/- 2^{0}$
ARSENIC	EPA-6010A	11/30/99	.976	0.3	mg/Kg
CADMIUM	EPA-6010A	11/30/99	.498	0.04	mg/Kg
CHROMIUM	EPA-6010A	11/30/99	1.91	0.03	mg/Kg
LEAD	EPA-6010A	11/30/99	37.7	0.5	mg/Kg
PCB's	EPA-608	11/30/99	BDL	2.00	mg/Kg
TOTAL HALIDES (TX)	EPA-9076	11/30/99	388	0.10	mg/Kg

MDL* : METHOD DETECTON LIMIT
BDL : BELOW DETECTION LIMIT

Certified by: _____ Analyst

Certified by: _____ Q.A. Officer

State of Florida Certification: E84160 COMQAP: 870319G

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Survey

The Justice Department wants to split Microsoft into three companies - two selling competing versions of Windows and one selling other programs. What would this do?

- Lower prices and result in better programs. (7%)
- Confuse everyone with competing versions of Windows. (26%)
- Scuttle the most innovative company in the computer business. (60%)

World Fuel Services to sell oil-recycling unit

By DOREEN HEMLOCK Sun-Sentinel
Web-posted: 9:25 p.m. Jan. 13, 2000

Stung by theft in Nigeria and bad debts in Ecuador, money-losing World Fuel Services said on Thursday it will sell its profitable oil-recycling unit to Dallas-based EarthCare for $33 million.

The Miami Springs-based company said it will invest the proceeds in technology and e-commerce, as well as acquisitions to expand its core business: selling fuel to ships and airplanes worldwide.

International Petroleum, the recycling unit, operates in 16 southern and mid-Atlantic states, employs about 130 people and had revenues of about $26 million this fiscal year.

The move comes as World Fuel seeks to boost its depressed stock price from Thursday's $8.88 a share, down from $16 last July and a peak of $23 in 1998. The sale should reduce Wall Street's perception of environmental risks from recycling oil, said Robert Tocci, World Fuel's executive vice president.

Still, the selloff could pinch profits, because recycling was World Fuel's cash cow. While the used-oil business accounts for less than 3 percent of the company's estimated $1 billion sales this fiscal year, recycling has supplied as much as 21 percent of operating profits in some years, executives have said.

World Fuel can ill afford a blow to earnings. In the quarter ended on Sept. 30, it reported a net loss of $242,000, a reversal from $3.5 million in net income in the quarter a year earlier. The losses included about $3 million in charges linked to the theft of oil that was supposed to be sold to oil rigs off Nigeria's coast, plus provisions for debts unlikely to be collected from airlines in Ecuador amid a financial crisis there.

The sale will leave World Fuel with about 250 workers, Tocci said.

GENERAL CONDITIONS: (cont'd)

7. The permittee, by accepting this permit, specifically agrees to allow authorized Department personnel, upon presentation of credentials or other documents as may be required by law, access to the premises, at reasonable times, where the permitted activity is located or conducted for the purposes of:

a. Having access to and copying any records that must be kept under the conditions of the permit;

b. Inspecting the facility, equipment, practices, or operations regulated or required under this permit; and

c. Sampling or monitoring any substances or parameters at any location reasonably necessary to assure compliance with this permit or Department rules.

Reasonable time may depend on the nature of the concern being investigated.

8. If, for any reason, the permittee does not comply with or will be unable to comply with any condition or limitation specified in this permit, the permittee shall immediately notify and provide the Department with the following information:

(a) a description of and cause of non-compliance; and

(b) the period of non-compliance, including exact dates and times; or, if not corrected, the anticipated time the non-compliance is expected to continue, and steps being taken to reduce, eliminate, and prevent recurrence of the non-compliance.

The permittee shall be responsible for any and all damages which may result and may be subject to enforcement action by the Department for penalties or revocation of this permit.

9. In accepting this permit, the permittee understands and agrees that all records, notes, monitoring data and other information relating to the construction or operation of this permitted source, which are submitted to the Department, may be used by the Department as evidence in any enforcement case arising under the Florida Statutes or Department rules, except where such use is proscribed by Section 403.73 and 403.111, Florida Statutes. Such evidence shall only be used to the extent it is consistent with the Florida Rules of Civil Procedure and appropriate evidentiary rules.

CLARK
engineers - scientists

FINAL REPORT
WASTE CHARACTERIZATION PROGRAM

for

International Petroleum Corporation
105 South Alexander Street
Plant City, Florida 33566
Project 9277

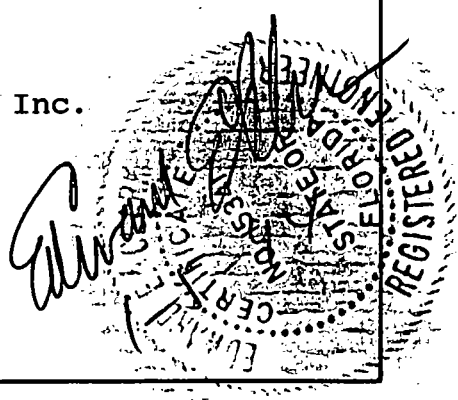
Prepared For:

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

Prepared By:

Edward E. Clark Engineers-Scientists, Inc.
7270 NW 12th Street, Suite 740
Miami, Florida 33126
(305) 233-1411

January 5, 1994



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1.0 INTRODUCTION

On June 28, 1993 International Petroleum Corporation (IPC) voluntarily 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 sludge and TCLP analysis. The Florida Department of Environmental Protection (FDEP) had the opportunity to split samples and split samples were collected during one of the five sampling events.

International Petroleum Corporation (IPC) 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., located at 755 Prairie Industrial Parkway, Mulberry, Florida for solidification prior to disposal at a permitted disposal facility.

This report summarizes the sampling procedures used to collect the sludge samples and includes a discussion of the analytical results that have been obtained during the testing program.

2.0 SLUDGE SAMPLING PROCEDURE

Representative samples of the combined sump and filter basket lint sludge were collected from each drum accumulated during a specific monthly period. Samples were collected from each individual drum and placed in a pre-cleaned stainless steel mixing bowl. After sampling each drum, the composite sludge sample was thoroughly mixed and then transferred to pre-cleaned sample jars supplied by Spectrum Laboratories, Inc.(SPECTRUM) of Ft. Lauderdale, Florida. Samples were stored in a shipping container with wet ice and transported to the laboratory for analysis.

SPECTRUM analyzed the TCLP leachate from the combined sample for volatile and extractable TCLP compounds by gas chromatography/mass spectrometry (GC/MS) by EPA Methods 624/625. TCLP metals were analyzed by either graphite furnace and cold vapor atomic absorption spectrophotometry, as appropriate. All analytical procedures were performed in accordance with SPECTRUM's FDEP approved Comprehensive Quality Assurance Plan (ComQAP) # 870206G.

Samples of the accumulated sludge were collected by representatives of CLARK on the following dates:

- June 28, 1993
- July 27, 1993
- August 30, 1993 *
- September 28, 1993
- October 28, 1993 **

* sample split with Tampa FDEP
** sample was collected by Spectrum Laboratories, Inc.

3.0 DISCUSSION OF RESULTS

The combined sump and filter basket composite samples collected on August 30, 1993 were split with Mr. Tim Rice, Hazardous Waste Section, FDEP, Tampa. Mr. Rice collected samples for TCLP volatile compounds and TCLP metals only.

A review of the analytical data, for the five combined sludge samples, shows that the sludge is classified as non-hazardous, as defined by the TCLP criteria. The amounts of benzene, tetrachloroethylene, other organics and metals present in each of the samples were well below maximum concentration for Toxicity Characteristic. The results of the five monthly sampling episodes are summarized in Table 1. Copies of the analytical results for the five sampling events and the split sample analyzed by FDEP are enclosed in Appendix A.

The results of the split sample by the two laboratories are very comparable and well within acceptable limits of one another. A comparison of the TCLP volatile data shows good agreement between the concentrations reported by both SPECTRUM and FDEP for benzene and tetrachloroethene, as shown in Table 1. A comparison of the metals concentrations, also shown in Table 1, shows slight differences in the concentrations reported for lead and barium. These differences may be attributed to the different methodologies employed by the two laboratories. SPECTRUM utilized graphite furnace AA for metal analysis, while FDEP utilized inductively coupled argon plasma (ICP). These methods have different detection limits - ICP limits are usually higher than graphite furnace. However, these slight differences have no significance as to the issue of waste characterization. The FDEP results where consistant

with previously obtained results; the combined sump waste and pump filter basket lint is classified as non-hazardous, as defined by the TCLP criteria.

CLARK

TABLES

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-hazardous

CLARK

APPENDIX A

Florida Department of
Environmental Protection

Lawton Chiles
Governor

Southwest District
3804 Coconut Palm Drive
Tampa, Florida 33619
813-744-6100

Virginia B. Wetherell
Secretary

FAX TRANSMITTAL SHEET

12/15/93
Date

TO: KEN BAUGHMAN

DEPT.: CLARK

FAX #: (305) 591-1549

FROM: TIMYN RICE

DEPT.: D.E.P., Tampa Office

PHONE: 813-744-6100 or SunCom 542-6100 Ext.
FAX(local)744-6125 or (SunCom) 542-6125

SUBJECT: INTERNATIONAL PETROLEUM

COMMENT:

TOTAL NUMBER OF PAGES, INCLUDING COVER PAGE: 16

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PHONE:

FLORIDA DEPARTMENT OF ENVIRONMENTAL PROTECTION
CENTRAL LABORATORY
2600 BLAIR STONE ROAD
TALLAHASSEE, FLORIDA 32399-2400

CHEMICAL ANALYSIS REPORT

Request ID: RQ-93-AUG-30-25
Job ID: 93-SEP-01-10 Project: OTHER
Job Name: INTERNATIONAL PETROLEUM - Job created on 1-SEP
Date Received: 1-SEP-1993 Customer ID: SW-TAM-WSM
Authorized: 30-SEP-1993 By: Liang T. Lin

Submitted By: SW DIST. OFFICE (TAMPA) - WASTE MANAGEMEN
3804 Coconut Palm Drive
Tampa, Florida 33619

Attn: Kent Edwards

For Additional Information, Please Contact
G. William Coppenger, Ph.D.
Yuh-Hsu Pan, Ph.D.
Timothy W. Fitzpatrick
Liang-Tsair Lin, Ph.D.
Suncom 277-2571
(904) 487-2571

Preliminary Review Copy Date: 18-OCT-1993

Abbreviations & Storet Codes:

A - Value reported is the mean of two or more determinations
B - Results based on colony counts outside the acceptable range.
I - Value reported is less than the minimum quantitation limit, and greater than or equal to the minimum detection limit.
J - Estimated value
K - Actual value is known to be less than value given
L - Actual value is known to be greater than value given
N - Presumptive evidence of presence of material.
O - Sampled, but analysis lost or not performed.
Q - Sample held beyond normal holding time.
T - Value reported is less than the criterion of detection.
U - Material was analyzed for but not detected; The value reported is the minimum detection limit.

V - Analyte was detected in both sample and method blank.
Z - Colonies were too numerous to count (TNTC).

18-OCT-1993

Sample ID: 61364/93-SEP-01-10-01 Matrix: S-OTHER
Location: INTERNATIONAL PETROLEUM
Field ID: FILTER BASKET
Collected: 30-AUG-1993 08:45 By: TANYA RICE
Authorized: 29-SEP-1993 By: Mei-Fang Shyu
Type: Grab Sample
Lab Comments:
DEP TEMP=1DC
Field Comments:
MATRIX=SLUDGE

Analysis ID: TCLP-VOC
Volatiles in TCLP ZHE extract by 5030-8260
Prepared: 9-SEP-1993 00:00 By: Kevin Everett
Analyzed: 14-SEP-1993 00:00 By: Jusheng Qi
Authorized: 24-SEP-1993 By: Jusheng Qi

Storet#	Analyte	Value	Units
	Benzene	9.6	ug/l
	Bromoform	2.5 U	ug/l
	Carbon tetrachloride	2.5 U	ug/l
	Chlorobenzene	2.5 U	ug/l
	Chloroform	2.5 U	ug/l
	1,2-Dichlorobenzene	5.0	ug/l
	1,3-Dichlorobenzene	2.5 U	ug/l
	1,4-Dichlorobenzene	2.5 U	ug/l
	Dibromochloromethane	2.5 U	ug/l
	1,1-Dichloroethane	2.5 U	ug/l
	1,2-Dichloroethane	2.5 U	ug/l
	1,1-Dichloroethene	2.5 U	ug/l
	1,2-Dichloropropane	2.5 U	ug/l
	Ethylbenzene	35	ug/l
	Methylene chloride	11	ug/l
	1,1,2,2-Tetrachloroethane	2.5 U	ug/l
	Tetrachloroethene	7.0	ug/l
	1,1,1-Trichloroethane	7.6	ug/l
	1,1,2-Trichloroethane	2.5 U	ug/l
	Trichloroethene	2.5 U	ug/l
	Toluene	89	ug/l
	Vinyl chloride	2.5 U	ug/l
	Xylenes	240	ug/l

Comments(1): Elevated detection limits due to sample matrix interference.
(2): Tentative identification: total purgeable petroleum hydrocaons=est. 920 ug/L.

********** END OF REPORT **********

Hills Cnty

FLORIDA DEPARTMENT OF ENVIRONMENTAL PROTECTION
CENTRAL LABORATORY
2600 BLAIR STONE ROAD
TALLAHASSEE, FLORIDA 32399-2400

CHEMICAL ANALYSIS REPORT

Request ID: RQ-93-AUG-30-25
Job ID: 93-SEP-01-06 Project: OTHER
Job Name: INTERNATIONAL PETROLEUM - Job created on 1-SEP
Date Received: 1-SEP-1993 Customer ID: SW-TAM-WSM
Authorized: 15-SEP-1993 By: Liang T. Lin

Submitted By: SW DIST. OFFICE (TAMPA) - WASTE MANAGEMEN
3804 Coconut Palm Drive
Tampa, Florida 33619

Attn: Kent Edwards

For Additional Information, Please Contact
G. William Coppenger, Ph.D.
Yuh-Hsu Pan, Ph.D.
Timothy W. Fitzpatrick
Liang-Tsair Lin, Ph.D.
Suncom 277-2571
(904) 487-2571

Preliminary Review Copy Date: 20-SEP-1993

Abbreviations & Storet Codes:

A - Value reported is the mean of two or more determinations
B - Results based on colony counts outside the acceptable range.
I - Value reported is less than the practical quantitation limit, and greater than or equal to the minimum detection limit.
J - Estimated value
K - Actual value is known to be less than value given
L - Actual value is known to be greater than value given
N - Presumptive evidence of presence of material.
O - Sampled, but analysis lost or not performed.
Q - Sample held beyond normal holding time.
T - Value reported is less than the criterion of detection.
U - Material was analyzed for but not detected; The value reported is the minimum detection limit.

V - Analyte was detected in both sample and method blank.
Z - Colonies were too numerous to count (TNTC).

Sample ID: 61357/93-SEP-01-06-01 Matrix: W-FIELD-BK
Location: INTERNATIONAL PETROLEUM
Field ID: FIELD BLANK
Collected: 30-AUG-1993 08:30 By: TANYA RICE
Authorized: 13-SEP-1993 By: Mei-Fang Shyu
Type: Grab Sample
Lab Comments:
DEP TEMP=1DC
Field Comments:

Analysis ID: W-VOC-MS-A
Volatiles in wtr or waste wtr by 624/5030-8240
Prepared: NA By:
Analyzed: 4-SEP-1993 00:00 By: Jusheng Qi
Authorized: 7-SEP-1993 By: Jusheng Qi

Storet#	Analyte	Value	Units
34030	Benzene	0.50 U	ug/L
32101	Bromodichloromethane	0.50 U	ug/L
32104	Bromoform	0.50 U	ug/L
34413	Bromomethane	O	ug/L
32102	Carbon tetrachloride	0.50 U	ug/L
34301	Chlorobenzene	0.50 U	ug/L
34311	Chloroethane	0.50 U	ug/L
34576	2-Chloroethylvinyl ether	0.50 U	ug/L
32106	Chloroform	0.50 U	ug/L
34418	Chloromethane	0.50 U	ug/L
34536	1,2-Dichlorobenzene	0.50 U	ug/L
34566	1,3-Dichlorobenzene	0.50 U	ug/L
34571	1,4-Dichlorobenzene	0.50 U	ug/L
32105	Dibromochloromethane	0.50 U	ug/L
34496	1,1-Dichloroethane	0.50 U	ug/L
34531	1,2-Dichloroethane	0.50 U	ug/L
34501	1,1-Dichloroethene	0.50 U	ug/L
34546	trans-1,2-Dichloroethene	0.50 U	ug/L
34541	1,2-Dichloropropane	0.50 U	ug/L
34561	cis-1,3-Dichloropropene	0.50 U	ug/L
34561	trans-1,3-Dichloropropene	0.50 U	ug/L
34371	Ethylbenzene	0.50 U	ug/L
34423	Methylene chloride	0.50 U	ug/L
34516	1,1,2,2-Tetrachloroethane	0.50 U	ug/L
34475	Tetrachloroethene	0.50 U	ug/L
34506	1,1,1-Trichloroethane	0.50 U	ug/L
34511	1,1,2-Trichloroethane	0.50 U	ug/L
39180	Trichloroethene	0.50 U	ug/L
34910	Toluene	0.50 U	ug/L
39175	Vinyl chloride	0.50 U	ug/L
81551	Xylenes	0.50 U	ug/L
	Trichlorofluoromethane	0.50 U	ug/L

Comments(1): O due to analytical problem only associated

61357/93-SEP-01-06-01/W-VOC-MS-A Continued on Page 3

Storet#	Analyte	Value	Units
	(2): with Bromomethane.		

Sample ID: 61358/93-SEP-01-06-02 Matrix: W-TRIP-BLK
Location: DEP LABORATORY
Field ID: TRIP BLANK
Collected: 25-AUG-1993 07:40 By: F MEISIEK
Authorized: 13-SEP-1993 By: Mei-Fang Shyu
Type: Grab Sample
Lab Comments:
DEP TEMP=1DC
Field Comments:

Analysis ID: W-VOC-MS-A
Volatiles in wtr or waste wtr by 624/5030-8240
Prepared: NA By:
Analyzed: 4-SEP-1993 00:00 By: Jusheng Qi
Authorized: 7-SEP-1993 By: Jusheng Qi

Storet#	Analyte	Value	Units
34030	Benzene	0.50 U	ug/L
32101	Bromodichloromethane	0.50 U	ug/L
32104	Bromoform	0.50 U	ug/L
34413	Bromomethane	O	ug/L
32102	Carbon tetrachloride	0.50 U	ug/L
34301	Chlorobenzene	0.50 U	ug/L
34311	Chloroethane	0.50 U	ug/L
34576	2-Chloroethylvinyl ether	0.50 U	ug/L
32106	Chloroform	0.50 U	ug/L
34418	Chloromethane	0.50 U	ug/L
34536	1,2-Dichlorobenzene	0.50 U	ug/L
34566	1,3-Dichlorobenzene	0.50 U	ug/L
34571	1,4-Dichlorobenzene	0.50 U	ug/L
32105	Dibromochloromethane	0.50 U	ug/L
34496	1,1-Dichloroethane	0.50 U	ug/L
34531	1,2-Dichloroethane	0.50 U	ug/L
34501	1,1-Dichloroethene	0.50 U	ug/L
34546	trans-1,2-Dichloroethene	0.50 U	ug/L
34541	1,2-Dichloropropane	0.50 U	ug/L
34561	cis-1,3-Dichloropropene	0.50 U	ug/L
34561	trans-1,3-Dichloropropene	0.50 U	ug/L
34371	Ethylbenzene	0.50 U	ug/L
34423	Methylene chloride	0.50 U	ug/L
34516	1,1,2,2-Tetrachloroethane	0.50 U	ug/L
34475	Tetrachloroethene	0.50 U	ug/L
34506	1,1,1-Trichloroethane	0.50 U	ug/L

61358/93-SEP-01-06-02/W-VOC-MS-A Continued on Page 4

20-SEP-1993 Page 4 of 4

61358/93-SEP-01-06-02/W-VOC-MS-A Continued from Page 3

Storet#	Analyte	Value	Units
34511	1,1,2-Trichloroethane	0.50 U	ug/L
39180	Trichloroethene	0.50 U	ug/L
34910	Toluene	0.50 U	ug/L
39175	Vinyl chloride	0.50 U	ug/L
81551	Xylenes	0.50 U	ug/L
	Trichlorofluoromethane	0.50 U	ug/L

Comments(1): O due to analytical problem only associated
(2): with Bromomethane.

********** END OF REPORT **********

Hills

29-SEP-1993

FLORIDA DEPARTMENT OF ENVIRONMENTAL PROTECTION
CENTRAL LABORATORY
2600 BLAIR STONE ROAD
TALLAHASSEE, FLORIDA 32399-2400

CHEMICAL ANALYSIS REPORT

Request ID: RQ-93-AUG-30-25
Job ID: 93-SEP-01-09 Project: OTHER
Job Name: INTERNATIONAL PETROLEUM - Job created on 1-SEP
Date Received: 1-SEP-1993 Customer ID: SW-TAM-WSM
Authorized: 21-SEP-1993 By: Tim Fitzpatrick

Submitted By: SW DIST. OFFICE (TAMPA) - WASTE MANAGEMEN
3804 Coconut Palm Drive
Tampa, Florida 33619

Attn: Kent Edwards

For Additional Information, Please Contact
G. William Coppenger, Ph.D.
Yuh-Hsu Pan, Ph.D.
Timothy W. Fitzpatrick
Liang-Tsair Lin, Ph.D.
Suncom 277-2571
(904) 487-2571

Preliminary Review Copy Date: 29-SEP-1993

Abbreviations & Storet Codes:

A - Value reported is the mean of two or more determinations
B - Results based on colony counts outside the acceptable range.
I - Value reported is less than the practical quantitation limit, and greater than or equal to the minimum detection limit.
J - Estimated value
K - Actual value is known to be less than value given
L - Actual value is known to be greater than value given
N - Presumptive evidence of presence of material.
O - Sampled, but analysis lost or not performed.
Q - Sample held beyond normal holding time.
T - Value reported is less than the criterion of detection.
U - Material was analyzed for but not detected; The value reported is the minimum detection limit.

V - Analyte was detected in both sample and method blank.
Z - Colonies were too numerous to count (TNTC).

Sample ID: 61363/93-SEP-01-09-01 Matrix: S-OTHER
Location: INTERNATIONAL PETROLEUM
Field ID: FILTER BASKET
Collected: 30-AUG-1993 08:45 By: TANYA RICE
Authorized: 21-SEP-1993 By: Tim Fitzpatrick
Type: Grab Sample
Lab Comments:
DEP TEMP=1DC
Field Comments:
MATRIX=SLUDGE

Analysis ID: HG-H-TCLP
Mercury in TCLP extracts by Method 7470, modified
Prepared: 7-SEP-1993 00:00 By: Jason Hatcher
Analyzed: 7-SEP-1993 15:00 By: Jason Hatcher
Authorized: 21-SEP-1993 By: Tim Fitzpatrick

Storet#	Analyte	Value	Units
	Mercury	0.0001 U	mg/L

Analysis ID: TCLP-ICP
ICP multielement analysis of TCLP extracts, Method 6010
Prepared: 3-SEP-1993 17:59 By: Jason Hatcher
Analyzed: 8-SEP-1993 14:56 By: Jin-Chaun Liu
Authorized: 21-SEP-1993 By: Tim Fitzpatrick

Storet#	Analyte	Value	Units
	Antimony	0	mg/L
	Aluminum	0	mg/L
	Arsenic	0.2 U	mg/L
	Barium	0.5 A	mg/L
	Cadmium	0.03 U	mg/L
	Chromium	0.1 U	mg/L
	Beryllium	0	mg/L
	Cobalt	0	mg/L
	Copper	0	mg/L
	Calcium	0	mg/L
	Lead	0.15 U	mg/L
	Manganese	0	mg/L
	Nickel	0	mg/L
	Selenium	0.3 U	mg/L
	Iron	0	mg/L
	Silver	0.03 U	mg/L
	Zinc	0	mg/L
	Magnesium	0	mg/L
	Potassium	0	mg/L
	Sodium	0	mg/L

61363/93-SEP-01-09-01/TCLP-ICP

Continued on Page 3

61363/93-SEP-01-09-01/TCLP-ICP Continued from Page 2

Storet#	Analyte	Value	Units
	Strontium	0	mg/L
	Thallium	0	mg/L
	Vanadium	0	mg/L

Comment Raw Data Transferred to LIMS Electronically

********** END OF REPORT **********

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Ft. Lauderdale, FL 33309
(305) 978-6400

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

Project Name or Number	Client Name
001	International Petroleum Corp
Project Location	
IPC Plant City	

LCN	Sample Number	Date	Time	Sample Matrix	Container (s)	Laboratory Analysis: TCLP-TCLP	Comments
631-102893	001-WS	10/28/93	2:30	Solid	2 Glass 8 oz jars	X	Tampa Pickup
				Filter Basket Lint Condensate			

SAMPLED BY:	Transfer Number	Item Number	* Transfers Relinquished by:	Accepted by:	Date	Time
[illegible]	1		[illegible]			
	2					
	3					
	4					

[illegible] Sam[illegible] that [illegible]eter[illegible]d to [illegible]zard[illegible] will [illegible]urne[illegible] subm[illegible].

SPECTRUM
Laboratories, Inc. FORT LAUDERDALE • SAVANNAH

TOXICITY CHARTERISTIC LEACHING PROCEDURE

CLIENT: INTERNATIONAL PETROLEUM
SAMPLE NUMBER: 036-102893
LOCATION: 001-WS
ADDITIONAL DATA: IPC PLANT CITY
SAMPLED BY: JIM OLIVER, SPECTRUM
SUBMITTED BY: GREYHOUND
DATE SAMPLED: 10/28/93 1420
DATE REPORTED: NOV. 15 1993
REVISION: 0

FL DRINKING WATER: #86144
FL ENVIRONMENTAL: #E86006
GEORGIA: #828,829
SOUTH CAROLINA: #96015
EPA: #FL095
FDER CQAP: #870206G
DATE RECEIVED: 10/29/93
SAMPLE MATRIX: SOIL

ANALYTE	METHOD	RESULT (- = <)	UNITS	REGULATORY CONC.	
ARSENIC TCLP	1311/7060	0.003	mg/l	5.0	mg/l
BARIUM TCLP	1311/7080	0.31	mg/l	100.0	mg/l
CADMIUM TCLP	1311/7131	0.02	mg/l	1.0	mg/l
CHROMIUM TCLP	1311/7191	0.04	mg/l	5.0	mg/l
LEAD TCLP	1311/7421	0.15	mg/l	5.0	mg/l
MERCURY TCLP	1311/7471	0.0002	mg/l	0.2	mg/l
SELENIUM TCLP	1311/7740	-0.002	mg/l	1.0	mg/l
SILVER TCLP	1311/7760	-0.01	mg/l	5.0	mg/l
CHLORDANE TCLP	1311/608	-1	ug/l	30	ug/l
2,4-D TCLP	1311/615	1.4	ug/l	10000	ug/l
ENDRIN TCLP	1311/608	-1	ug/l	20	ug/l
HEPTACHLOR TCLP	1311/608	-1	ug/l	8	ug/l
LINDANE TCLP	1311/608	-1	ug/l	400	ug/l
METHOXYCHLOR TCLP	1311/608	-1	ug/l	10000	ug/l
TOXAPHENE TCLP	1311/608	-10	ug/l	500	ug/l
SILVEX TCLP	1311/615	-1	ug/l	1000	ug/l
BENZENE TCLP	1311/624	1.13	ug/l	500	ug/l
CARBN TETRACHLORIDE TCLP	1311/624	-1	ug/l	500	ug/l
CHLOROBENZENE TCLP	1311/624	-1	ug/l	100000	ug/l
CHLOROFORM TCLP	1311/624	8.17	ug/l	6000	ug/l
1,2-DICHLOROETHANE TCLP	1311/624	-1	ug/l	500	ug/l
1,1-DICHLORETHYLENE TCLP	1311/624	-1	ug/l	700	ug/l
HEXACHLOROETHANE TCLP	1311/624	-1	ug/l	3000	ug/l
METHYL ETHYL KETONE TCLP	1311/624	34.2	ug/l	200000	ug/l
TETRACHLOROETHYLENE TCLP	1311/624	-1	ug/l	700	ug/l
TRICHLOROETHYLENE TCLP	1311/624	-1	ug/l	500	ug/l
VINYL CHLORIDE TCLP	1311/624	-1	ug/l	200	ug/l
O-CRESOL TCLP	1311/625	1.2	ug/l	200000	ug/l
M-CRESOL TCLP	1311/625	-1	ug/l	200000	ug/l
P-CRESOL TCLP	1311/625	6.4	ug/l	200000	ug/l
1,4-DICHLOROBENZENE TCLP	1311/625	-1	ug/l	7500	ug/l
2,4-DINITROTOLUENE TCLP	1311/625	-5	ug/l	130	ug/l
HEXACHLOROBENZENE TCLP	1311/625	-1	ug/l	130	ug/l
HEXACHLOROBUTADIENE TCLP	1311/625	-1	ug/l	500	ug/l
NITROBENZENE TCLP	1311/625	-1	ug/l	2000	ug/l
PENTACHLOROPHENOL TCLP	1311/625	42.1	ug/l	100000	ug/l
PYRIDINE TCLP	1311/625	-5	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
LAB MANAGER

1460 W. McNab Road, Ft. Lauderdale, FL 33309 • Phone: (305) 978-6400 • 630 Indian Street, Savannah, Ga. 31401 • Phone: (912) 238-5050

CHAIN OF CUSTODY RECORD

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Ft. Lauderdale, FL 33309
(305) 978-6400

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

Project Name or Number	Client Name
9277.02	Clark Engineers
Project Location	
Plant, City	

LCN	Sample Number	Date	Time	Sample Matrix	Container (s)	Laboratory Analysis: Full TCL-P	Laboratory Analysis: Not Pest. or Herb.	Comments
142.093093	Lint basket waste	9-28-93		S.	1	X		

SAMPLED BY:	Transfer Number	Item Number	• Transfers Relinquished by:	Accepted by:	Date	Time
	1			Ralph Taylor	9-28-93	10:35
	2					
	3					
	4					

[redacted] Sam[redacted] that [redacted] peter[redacted] d to [redacted] azar[redacted] will [redacted] turn[redacted] sub[redacted] r. [redacted]

EDWARD E. CLARK ENGINEERS-SCIENTISTS, INC.
ENGINEERS-SCIENTISTS LABORATORY, INC.

GROUNDWATER MONITORING WELL DATA

PROJECT No: 9277.02 DATE: 9-28-93 TIME: ________

SITE LOCATION: I. P.C.
Plant City

SAMPLERS(s): [illegible signature]

SAMPLE ID:	WELL DIAMETER (inches)	GROUND LEVEL TO H2O SURFACE IN FEET	SURFACE TO WELL BOTTOM IN FEET	SCREEN DEPTH (ft)	WELL CAPACITY (gallons)	EVACUATION VOLUME (GALLONS)	EVACUATION METHOD	COMMENTS:
Lint oke Composite	rui c	Campos	In	tr..	tc P.			

SPECTRUM

Laboratories, Inc. FORT LAUDERDALE • SAVANNAH

TOXICITY CHARTERISTIC LEACHING PROCEDURE

CLIENT: ENGINEERS & SCIENTIST
SAMPLE NUMBER: 142-093093
LOCATION: 9277.02/LINT BASKET WASTE
ADDITIONAL DATA: PLANT CITY
SAMPLED BY: PAT FOX,CLARK
SUBMITTED BY: RALPH TARDIF,SPECTRUM
DATE SAMPLED: 09/28/93
DATE REPORTED: OCT. 15 1993
REVISION: 0

FL DRINKING WATER: #86144
FL ENVIRONMENTAL: #E86006
GEORGIA: #828,829
SOUTH CAROLINA: #96015
EPA: #FL095
FDER CQAP: #870206G
DATE RECEIVED: 09/30/93
SAMPLE MATRIX: SOIL

ANALYTE	METHOD	RESULT (- = <)	UNITS	REGULATORY CONC.	
ARSENIC TCLP	1311/7060	-0.002	mg/l	5.0	mg/l
BARIUM TCLP	1311/7080	1.02	mg/l	100.0	mg/l
CADMIUM TCLP	1311/7131	0.04	mg/l	1.0	mg/l
CHROMIUM TCLP	1311/7191	0.04	mg/l	5.0	mg/l
LEAD TCLP	1311/7421	0.14	mg/l	5.0	mg/l
MERCURY TCLP	1311/7471	-0.0002	mg/l	0.2	mg/l
SELENIUM TCLP	1311/7740	-0.002	mg/l	1.0	mg/l
SILVER TCLP	1311/7760	-0.04	mg/l	5.0	mg/l
CHLORDANE TCLP	1311/608			30	ug/l
2,4-D TCLP	1311/615			10000	ug/l
ENDRIN TCLP	1311/608			20	ug/l
HEPTACHLOR TCLP	1311/608			8	ug/l
LINDANE TCLP	1311/608			400	ug/l
METHOXYCHLOR TCLP	1311/608			10000	ug/l
TOXAPHENE TCLP	1311/608			500	ug/l
SILVEX TCLP	1311/615			1000	ug/l
BENZENE TCLP	1311/624	-1	ug/l	500	ug/l
CARBN TETRACHLORIDE TCLP	1311/624	-1	ug/l	500	ug/l
CHLOROBENZENE TCLP	1311/624	-1	ug/l	100000	ug/l
CHLOROFORM TCLP	1311/624	-1	ug/l	6000	ug/l
1,2-DICHLOROETHANE TCLP	1311/624	-1	ug/l	500	ug/l
1,1-DICHLORETHYLENE TCLP	1311/624	-1	ug/l	700	ug/l
HEXACHLOROETHANE TCLP	1311/624	-1	ug/l	3000	ug/l
METHYL ETHYL KETONE TCLP	1311/624	-5	ug/l	200000	ug/l
TETRACHLOROETHYLENE TCLP	1311/624	2.93	ug/l	700	ug/l
TRICHLOROETHYLENE TCLP	1311/624	-1	ug/l	500	ug/l
VINYL CHLORIDE TCLP	1311/624	-1	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	-1	ug/l	7500	ug/l
2,4-DINITROTOLUENE TCLP	1311/625	-5	ug/l	130	ug/l
HEXACHLOROBENZENE TCLP	1311/625	-1	ug/l	130	ug/l
HEXACHLOROBUTADIENE TCLP	1311/625	-1	ug/l	500	ug/l
NITROBENZENE TCLP	1311/625	-1	ug/l	2000	ug/l
PENTACHLOROPHENOL TCLP	1311/625	-1	ug/l	100000	ug/l
PYRIDINE TCLP	1311/625	-5	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
LAB MANAGER

CHAIN OF CUSTODY RECORD

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(305) 978-6400

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

Project Name or Number	Client Name
I.P.C. Inc.	Clark Engineers
Project Location	
104 S Alexander St, Plant City	

LCN	Sample Number	Date	Time	Sample Matrix	Container (s)	Laboratory Analysis: Total TCLP							Comments
013-072993	Filter Basket Last Composite	7-27-93	0810	Drum composite A & B	1	X							

SAMPLED BY:	Transfer Number	Item Number	* Transfers Relinquished by:	Accepted by:	Date	Time
	1				7-27-92	1:16
	2					
	3					
	4					

* Samples that are determined to be hazardous will be returned to submitter.

EDWARD E. CLARK ENGINEERS-SCIENTISTS, INC.
ENGINEERS-SCIENTISTS LABORATORY, INC.

GROUNDWATER MONITORING WELL DATA

PROJECT No: _____ DATE: 7-27-93 TIME: _____

SITE LOCATION: I.P.C. Plant
Plant City, FLA
104 S ALEXANDER ST

SAMPLERS(s): JBC

SAMPLE ID:	WELL DIAMETER (inches)	GROUND LEVEL TO H2O SURFACE IN FEET	SURFACE TO WELL BOTTOM IN FEET	SCREEN DEPTH (ft)	WELL CAPACITY (gallons)	EVACUATION VOLUME (GALLONS)	EVACUATION METHOD	COMMENTS:
Filter Basket Lint Composite.	2 drums (I labled	A & B) and Composited in						
	there	Lab. Sound	on Tray and stirred w/ spatula					
	and	Collected.						

SPECTRUM

Laboratories, Inc. FORT LAUDERDALE • SAVANNAH

TOXICITY CHARTERISTIC LEACHING PROCEDURE

CLIENT: ENGINEERS & SCIENTIST
SAMPLE NUMBER: 020-083193
LOCATION: DRUM COMPOSITE LINT BASKET
ADDITIONAL DATA: IPC/PLANT CITY
SAMPLED BY: PAT FOX,CLARK
SUBMITTED BY: PAT FOX,CLARK
DATE SAMPLED: 08/30/93
DATE REPORTED: SEPT 17 1993
REVISION: 0

FL DRINKING WATER: #86144
FL ENVIRONMENTAL: #E86006
GEORGIA: #828,829
SOUTH CAROLINA: #96015
EPA: #FL095
FDER COAP: #870206G
DATE RECEIVED: 08/31/93
SAMPLE MATRIX: SOIL

ANALYTE	METHOD	RESULT (- = <)	UNITS	REGULATORY CONC.	
ARSENIC TCLP	1311/7060	0.004	mg/l	5.0	mg/l
BARIUM TCLP	1311/7080	-0.05	mg/l	100.0	mg/l
CADMIUM TCLP	1311/7131	-0.05	mg/l	1.0	mg/l
CHROMIUM TCLP	1311/7191	-0.05	mg/l	5.0	mg/l
LEAD TCLP	1311/7421	0.09	mg/l	5.0	mg/l
MERCURY TCLP	1311/7471	-0.0002	mg/l	0.2	mg/l
SELENIUM TCLP	1311/7740	-0.002	mg/l	1.0	mg/l
SILVER TCLP	1311/7760	-0.01	mg/l	5.0	mg/l
CHLORDANE TCLP	1311/608			30	ug/l
2,4-D TCLP	1311/615			10000	ug/l
ENDRIN TCLP	1311/608			20	ug/l
HEPTACHLOR TCLP	1311/608			8	ug/l
LINDANE TCLP	1311/608			400	ug/l
METHOXYCHLOR TCLP	1311/608			10000	ug/l
TOXAPHENE TCLP	1311/608			500	ug/l
SILVEX TCLP	1311/615			1000	ug/l
BENZENE TCLP	1311/624	6.45	ug/l	500	ug/l
CARBN TETRACHLORIDE TCLP	1311/624	-1	ug/l	500	ug/l
CHLOROBENZENE TCLP	1311/624	-1	ug/l	100000	ug/l
CHLOROFORM TCLP	1311/624	-1	ug/l	6000	ug/l
1,2-DICHLOROETHANE TCLP	1311/624	-1	ug/l	500	ug/l
1,1-DICHLORETHYLENE TCLP	1311/624	-1	ug/l	700	ug/l
HEXACHLOROETHANE TCLP	1311/624	-1	ug/l	3000	ug/l
METHYL ETHYL KETONE TCLP	1311/624	-5	ug/l	200000	ug/l
TETRACHLOROETHYLENE TCLP	1311/624	5.26	ug/l	700	ug/l
TRICHLORGETHYLENE TCLP	1311/624	-1	ug/l	500	ug/l
VINYL CHLORIDE TCLP	1311/624	-1	ug/l	200	ug/l
O-CRESOL TCLP	1311/625	-2.5	ug/l	200000	ug/l
M-CRESOL TCLP	1311/625	-2.5	ug/l	200000	ug/l
P-CRESOL TCLP	1311/625	-2.5	ug/l	200000	ug/l
1,4-DICHLOROBENZENE TCLP	1311/625	-1	ug/l	7500	ug/l
2,4-DINITROTOLUENE TCLP	1311/625	-12.5	ug/l	130	ug/l
HEXACHLOROBENZENE TCLP	1311/625	-2.5	ug/l	130	ug/l
HEXACHLOROBUTADIENE TCLP	1311/625	-1	ug/l	500	ug/l
NITROBENZENE TCLP	1311/625	-2.5	ug/l	2000	ug/l
PENTACHLOROPHENOL TCLP	1311/625	-2.5	ug/l	100000	ug/l
PYRIDINE TCLP	1311/625	-5	ug/l	5000	ug/l
245-TRICHLOROPHENOL TCLP	1311/625	-2.5	ug/l	400000	ug/l
246-TRICHLOROPHENOL TCLP	1311/625	-2.5	ug/l	2000	ug/l

IF YOU HAVE ANY QUESTIONS PLEASE CONTACT ME.

LYLE A. JOHNSON
LAB MANAGER

1460 W. McNab Road, Ft. Lauderdale, FL 33309 • Phone: (305) 978-6400 • 630 Indian Street, Savannah, Ga. 31401 • Phone: (912) 238-5050

CLARK
engineers - scientists

July 29, 1993

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

Re: Soil sampling results

Dear Mr. Allen:

Enclosed please find the Spectrum laboratory results for the soil sample collected by a representative of Edward E. Clark Engineers-Scientists, Inc. (CLARK) on June 28, 1993. The sample was collected from the grass area at the west end of the IPC facility, from the area show in the picture attached to the Warning Notice dated April 19, 1993.

The soil sample (labeled SB-1) was collected in accordance with procedures specified in the CLARK approved ComQAP (870224G) by using a stainless steel hand-held split spoon sampler. The soil sample was taken from land surface to a depth of 1-foot below land surface (BLS). The sampler was decontaminated prior to use and the soil placed in pre-cleaned 250 ml glass sample jars, properly labeled and transported to the laboratory. The sample was analyzed for Total Recoverable Petroleum Hydrocarbons (TRPH) using EPA Method 9073.

Please contact me if you have any questions or comments.

Yours truly,

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

EEC/bjk

9277

CHAIN OF CUSTODY RECORD

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Ft. Lauderdale, FL 33309
(305) 978-6400

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

Project Name or Number	Client Name
9277.02	CLARK ENGINEERS-SCIENTISTS
Project Location	7270 NW 12th St, Suite 740
IAC PLANT City	MIAMI, FL 33126

LCN	Sample Number	Date	Time	Sample Matrix	Container (s)	Laboratory Analysis: TRPH	TCLP-10						Comments
021-062993	SB-1	6/28/93	10:20	SOIL	2	X							SB=soil boring
022-062993	WS-1	6/28/93	10:40	FILTER BASKET LINT Composite	2		X						WS=waste sample

SAMPLED BY: JAMAR	Transfer Number	Item Number	• Transfers Relinquished by:	Accepted by:	Date	Time
	1			Dwight Alsobrook	6-28-93	4:16 PM
	2					
	3					
	4					

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Laboratories, Inc. FORT LAUDERDALE • SAVANNAH

RESULTS OF ANALYSIS

CLIENT:	**ENGINEERS & SCIENTIST**	FL DRINKING WATER:	#86144
SAMPLE NUMBER:	021-062993	FL ENVIRONMENTAL:	#E86006
LOCATION:	**9277.02/SB-1**	GEORGIA:	#828,829
ADDITIONAL DATA:	**IPC PLANT CITY**	SOUTH CAROLINA:	#96015
SAMPLED BY:	JAMAL	EPA:	#FL095
SUBMITTED BY:	DWIGHT SLUSHER	FDER CQAP:	#870206G
DATE SAMPLED:	06/28/93 1020	DATE RECEIVED:	06/28/93
DATE REPORTED:	JULY 13 1993	SAMPLE MATRIX:	SOIL
REVISION:	0		

Parameter	Method	Results (- = <)	Units	Analysis Date and Time	Analyst
TRPH IN SOLID	EPA 9073	20.7	mg/kg	930712 165630	RLH

LYLE A. JOHNSON
LAB MANAGER

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Laboratories, Inc. FORT LAUDERDALE · SAVANNAH

TOXICITY CHARTERISTIC LEACHING PROCEDURE

CLIENT:	**ENGINEERS & SCIENTIST**	FL DRINKING WATER:	#86144
SAMPLE NUMBER:	022-062993	FL ENVIRONMENTAL:	#E86006
LOCATION:	**9277.02/WS-1**	GEORGIA:	#828,829
ADDITIONAL DATA:	**IPC PLANT CITY**	SOUTH CAROLINA:	#96015
SAMPLED BY:	JAMAL	EPA:	#FL095
SUBMITTED BY:	DWIGHT SLUSHER	FDER CQAP:	#870206G
DATE SAMPLED:	06/28/93 1040	DATE RECEIVED:	06/28/93
DATE REPORTED:	JULY 21 1993	SAMPLE MATRIX:	SOIL
REVISION:	0		

ANALYTE	METHOD	RESULT (- = <)	UNITS	REGULATORY CONC.	
ARSENIC TCLP	1311/7060	0.003	mg/l	5.0	mg/l
BARIUM TCLP	1311/7080	0.72	mg/l	100.0	mg/l
CADMIUM TCLP	1311/7131	0.0021	mg/l	1.0	mg/l
CHROMIUM TCLP	1311/7191	0.003	mg/l	5.0	mg/l
LEAD TCLP	1311/7421	0.071	mg/l	5.0	mg/l
MERCURY TCLP	1311/7471	-0.0002	mg/l	0.2	mg/l
SELENIUM TCLP	1311/7740	-0.002	mg/l	1.0	mg/l
SILVER TCLP	1311/7760	-0.01	mg/l	5.0	mg/l
CHLORDANE TCLP	1311/608	-1	ug/l	30	ug/l
2,4-D TCLP	1311/615	-1	ug/l	10000	ug/l
ENDRIN TCLP	1311/608	-1	ug/l	20	ug/l
HEPTACHLOR TCLP	1311/608	-1	ug/l	8	ug/l
LINDANE TCLP	1311/608	-1	ug/l	400	ug/l
METHOXYCHLOR TCLP	1311/608	-1	ug/l	10000	ug/l
TOXAPHENE TCLP	1311/608	-10	ug/l	500	ug/l
SILVEX TCLP	1311/615	-1	ug/l	1000	ug/l
BENZENE TCLP	1311/624	4.62	ug/l	500	ug/l
CARBN TETRACHLORIDE TCLP	1311/624	-1	ug/l	500	ug/l
CHLOROBENZENE TCLP	1311/624	-1	ug/l	100000	ug/l
CHLOROFORM TCLP	1311/624	-1	ug/l	6000	ug/l
1,2-DICHLOROETHANE TCLP	1311/624	-1	ug/l	500	ug/l
1,1-DICHLORETHYLENE TCLP	1311/624	-1	ug/l	700	ug/l
HEXACHLOROETHANE TCLP	1311/624	-1	ug/l	3000	ug/l
METHYL ETHYL KETONE TCLP	1311/624	-5	ug/l	200000	ug/l
TETRACHLOROETHYLENE TCLP	1311/624	1.82	ug/l	700	ug/l
TRICHLOROETHYLENE TCLP	1311/624	-1	ug/l	500	ug/l
VINYL CHLORIDE TCLP	1311/624	-1	ug/l	200	ug/l
O-CRESOL TCLP	1311/625	41.1	ug/l	200000	ug/l
M-CRESOL TCLP	1311/625	-1	ug/l	200000	ug/l
P-CRESOL TCLP	1311/625	17.7	ug/l	200000	ug/l
1,4-DICHLOROBENZENE TCLP	1311/625	-1	ug/l	7500	ug/l
2,4-DINITROTOLUENE TCLP	1311/625	-5	ug/l	130	ug/l
HEXACHLOROBENZENE TCLP	1311/625	-1	ug/l	130	ug/l
HEXACHLOROBUTADIENE TCLP	1311/625	-1	ug/l	500	ug/l
NITROBENZENE TCLP	1311/625	-1	ug/l	2000	ug/l
PENTACHLOROPHENOL TCLP	1311/625	-1	ug/l	100000	ug/l
PYRIDINE TCLP	1311/625	-10	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
LAB MANAGER

1460 W. McNab Road, Ft. Lauderdale, FL 33309 • Phone: (305) 978-6400 • 630 Indian Street, Savannah, Ga. 31401 • Phone: (912) 238-5050

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(305) 978-6400

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

Project Name or Number: I.P.C. 9277

Client Name: CLARK Engineers

Project Location: Plant City, FLA.

LCN	Sample Number	Date	Time	Sample Matrix	Container (s)	Laboratory Analysis: Total TCLP except - Herbicides/Pesticides	Comments
020-083193	Drum Composite Lint Basket	8-30-93		Composite Sludge	1	X	

SAMPLED BY:	Transfer Number	Item Number	* Transfers Relinquished by:	Accepted by:	Date	Time
	1				8-30-93	
	2					
	3					
	4					

* Samples that are determined to be hazardous will be returned to submitter.

CLARK ENGINEERS-SCIENTIST, INC.

PAGE___ OF ___

FIELD QUALITY CONTROL CHECKLIST

NO:	
DATE:	8-30-93
SITE LOCATION:	I.P.C. Plant city
FIELD SAMPLER(s):	[signature]

GENERAL COMMENTS

Split Sample w/ Tonya Rice
Hazardous Waste Compliance Section
D.E.R.

SAMPLE ID	BAILER RINSED	TAPES CLEANED	WATER LEVEL INDICATOR RINSED	PUMP/HOSES CLEANED	pH METER CALIB.	DD METER CALIB.	CONDUCT METER CALIB.	REMARKS/ OBSERVATIONS
Drum comp Lunt Basalt	N/A	N/A	N/A	N/A	N/A	N/A	N/A	
			Sampled top	drums Seperatley,		Used in a teflon pan		
			and Sampled					

8/90

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Laboratories, Inc. FORT LAUDERDALE • SAVANNAH

TOXICITY CHARTERISTIC LEACHING PROCEDURE

CLIENT:	**ENGINEERS & SCIENTIST**	FL DRINKING WATER:	#86144
SAMPLE NUMBER:	022-062993	FL ENVIRONMENTAL:	#E86006
LOCATION:	**9277.02/WS-1**	GEORGIA:	#828,829
ADDITIONAL DATA:	**IPC PLANT CITY**	SOUTH CAROLINA:	#96015
SAMPLED BY:	JAMAL	EPA:	#FL095
SUBMITTED BY:	DWIGHT SLUSHER	FDER COAP:	#870206G
DATE SAMPLED:	06/28/93 1040	DATE RECEIVED:	06/28/93
DATE REPORTED:	JULY 21 1993	SAMPLE MATRIX:	SOIL
REVISION:	0		

ANALYTE	METHOD	RESULT (- = <)	UNITS	REGULATORY CONC.	
ARSENIC TCLP	1311/7060	0.003	mg/l	5.0	mg/l
BARIUM TCLP	1311/7080	0.72	mg/l	100.0	mg/l
CADMIUM TCLP	1311/7131	0.0021	mg/l	1.0	mg/l
CHROMIUM TCLP	1311/7191	0.003	mg/l	5.0	mg/l
LEAD TCLP	1311/7421	0.071	mg/l	5.0	mg/l
MERCURY TCLP	1311/7471	-0.0002	mg/l	0.2	mg/l
SELENIUM TCLP	1311/7740	-0.002	mg/l	1.0	mg/l
SILVER TCLP	1311/7760	-0.01	mg/l	5.0	mg/l
CHLORDANE TCLP	1311/608	-1	ug/l	30	ug/l
2,4-D TCLP	1311/615	-1	ug/l	10000	ug/l
ENDRIN TCLP	1311/608	-1	ug/l	20	ug/l
HEPTACHLOR TCLP	1311/608	-1	ug/l	8	ug/l
LINDANE TCLP	1311/608	-1	ug/l	400	ug/l
METHOXYCHLOR TCLP	1311/608	-1	ug/l	10000	ug/l
TOXAPHENE TCLP	1311/608	-10	ug/l	500	ug/l
SILVEX TCLP	1311/615	-1	ug/l	1000	ug/l
BENZENE TCLP	1311/624	4.62	ug/l	500	ug/l
CARBN TETRACHLORIDE TCLP	1311/624	-1	ug/l	500	ug/l
CHLOROBENZENE TCLP	1311/624	-1	ug/l	100000	ug/l
CHLOROFORM TCLP	1311/624	-1	ug/l	6000	ug/l
1,2-DICHLOROETHANE TCLP	1311/624	-1	ug/l	500	ug/l
1,1-DICHLORETHYLENE TCLP	1311/624	-1	ug/l	700	ug/l
HEXACHLOROETHANE TCLP	1311/624	-1	ug/l	3000	ug/l
METHYL ETHYL KETONE TCLP	1311/624	-5	ug/l	200000	ug/l
TETRACHLOROETHYLENE TCLP	1311/624	1.82	ug/l	700	ug/l
TRICHLOROETHYLENE TCLP	1311/624	-1	ug/l	500	ug/l
VINYL CHLORIDE TCLP	1311/624	-1	ug/l	200	ug/l
O-CRESOL TCLP	1311/625	41.1	ug/l	200000	ug/l
M-CRESOL TCLP	1311/625	-1	ug/l	200000	ug/l
P-CRESOL TCLP	1311/625	17.7	ug/l	200000	ug/l
1,4-DICHLOROBENZENE TCLP	1311/625	-1	ug/l	7500	ug/l
2,4-DINITROTOLUENE TCLP	1311/625	-5	ug/l	130	ug/l
HEXACHLOROBENZENE TCLP	1311/625	-1	ug/l	130	ug/l
HEXACHLOROBUTADIENE TCLP	1311/625	-1	ug/l	500	ug/l
NITROBENZENE TCLP	1311/625	-1	ug/l	2000	ug/l
PENTACHLOROPHENOL TCLP	1311/625	-1	ug/l	100000	ug/l
PYRIDINE TCLP	1311/625	-10	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
LAB MANAGER

CHAIN OF CUSTODY RECORD

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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
9277.02	CLARK ENGINEERS-SCIENTISTS
Project Location	7270 NW 12th St, Suite 140
IAC PLANT City	MIAMI, FL 33126

LCN	Sample Number	Date	Time	Sample Matrix	Container (s)	Laboratory Analysis: TRPH	TCLP-10K	Comments
021-062993	SB-1	6/28/93	10:20	SOIL	2	X		SB=soil boring
022-062993	WS-1	6/28/93	10:40	FILTER BASKET LINT Composite	2		X	WS=waste sample

	Transfer Number	Item Number	• Transfers Relinquished by:	Accepted by:	Date	Time
PLED BY: JAMAR	1			Dwight Alsobrook	6-28-93	4:16 PM
	2					
	3					
	4					

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Laboratories, Inc. FORT LAUDERDALE • SAVANNAH

TOXICITY CHARTERISTIC LEACHING PROCEDURE

CLIENT: **ENGINEERS & SCIENTIST**
SAMPLE NUMBER: 013-072993
LOCATION: **FILTER BASKET LINT COMP.**
ADDITIONAL DATA: **I.P.C. INC.**
SAMPLED BY: PAT FOX,CLARK
SUBMITTED BY: RALPH TARDIF,SPECTRUM
DATE SAMPLED: 07/27/93 0810
DATE REPORTED: AUG. 9 1993
REVISION: 0

FL DRINKING WATER: #86144
FL ENVIRONMENTAL: #E86006
GEORGIA: #828,829
SOUTH CAROLINA: #96015
EPA: #FL095
FDER COAP: #870206G
DATE RECEIVED: 07/29/93
SAMPLE MATRIX: SOIL

ANALYTE	METHOD	RESULT (- = <)	UNITS	REGULATORY CONC.	
ARSENIC TCLP	1311/7060	0.009	mg/l	5.0	mg/l
BARIUM TCLP	1311/7080	3.77	mg/l	100.0	mg/l
CADMIUM TCLP	1311/7131	-0.1	mg/l	1.0	mg/l
CHROMIUM TCLP	1311/7191	0.30	mg/l	5.0	mg/l
LEAD TCLP	1311/7421	0.14	mg/l	5.0	mg/l
MERCURY TCLP	1311/7471	-0.0002	mg/l	0.2	mg/l
SELENIUM TCLP	1311/7740	-0.002	mg/l	1.0	mg/l
SILVER TCLP	1311/7760	-0.01	mg/l	5.0	mg/l
CHLORDANE TCLP	1311/608	-1	ug/l	30	ug/l
2,4-D TCLP	1311/615	-1	ug/l	10000	ug/l
ENDRIN TCLP	1311/608	-1	ug/l	20	ug/l
HEPTACHLOR TCLP	1311/608	-1	ug/l	8	ug/l
LINDANE TCLP	1311/608	-1	ug/l	400	ug/l
METHOXYCHLOR TCLP	1311/608	-1	ug/l	10000	ug/l
TOXAPHENE TCLP	1311/608	-10	ug/l	500	ug/l
SILVEX TCLP	1311/615	-1	ug/l	1000	ug/l
BENZENE TCLP	1311/624	2.7	ug/l	500	ug/l
CARBN TETRACHLORIDE TCLP	1311/624	-1	ug/l	500	ug/l
CHLOROBENZENE TCLP	1311/624	-1	ug/l	100000	ug/l
CHLOROFORM TCLP	1311/624	-1	ug/l	6000	ug/l
1,2-DICHLOROETHANE TCLP	1311/624	-1	ug/l	500	ug/l
1,1-DICHLORETHYLENE TCLP	1311/624	-1	ug/l	700	ug/l
HEXACHLOROETHANE TCLP	1311/624	-1	ug/l	3000	ug/l
METHYL ETHYL KETONE TCLP	1311/624	-5	ug/l	200000	ug/l
TETRACHLOROETHYLENE TCLP	1311/624	2.0	ug/l	700	ug/l
TRICHLOROETHYLENE TCLP	1311/624	-1	ug/l	500	ug/l
VINYL CHLORIDE TCLP	1311/624	-1	ug/l	200	ug/l
O-CRESOL TCLP	1311/625	15.8	ug/l	200000	ug/l
M-CRESOL TCLP	1311/625	-1	ug/l	200000	ug/l
P-CRESOL TCLP	1311/625	3.7	ug/l	200000	ug/l
1,4-DICHLOROBENZENE TCLP	1311/625	-1	ug/l	7500	ug/l
2,4-DINITROTOLUENE TCLP	1311/625	-5	ug/l	130	ug/l
HEXACHLOROBENZENE TCLP	1311/625	-1	ug/l	130	ug/l
HEXACHLOROBUTADIENE TCLP	1311/625	-1	ug/l	500	ug/l
NITROBENZENE TCLP	1311/625	-1	ug/l	2000	ug/l
PENTACHLOROPHENOL TCLP	1311/625	-1	ug/l	100000	ug/l
PYRIDINE TCLP	1311/625	-5	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
LAB MANAGER

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

Project Name or Number	Client Name
9277.02	CLARK ENGINEER-SCIENTISTS INC
Project Location	7270 NW 12 STREET SUIT 740
IPC PLANT CITY FLA	MIAMI, FLA 33126

Laboratory Analysis

LCN	Sample Number	Date	Time	Sample Matrix	Container (s)	FULL TCLP						Comments
022-061193	1	6/10/93		SOLID	1	X						TRIAL RUN LINT SHAKEL PROCESS
												Give Verbal
												On Benzene
												To Ken ASAP

SAMPLED BY:	Transfer Number	Item Number	* Transfers Relinquished by:	Accepted by:	Date	Time
Tommy L Allen	1	1-6	Air Express	[illegible]	6/11/93	9:30
	2					
	3					
	4					

* Samples that are determined to be hazardous will be returned to submitter.

SPECTRUM
Laboratories, Inc. FORT LAUDERDALE • SAVANNAH

TOXICITY CHARTERISTIC LEACHING PROCEDURE

CLIENT: **ENGINEERS & SCIENTIST**
SAMPLE NUMBER: 022-061193
LOCATION: **9277.02/1**
ADDITIONAL DATA: **IPC PLANT CITY, FL**
SAMPLED BY: CLIENT
SUBMITTED BY: AIR EXPRESS
DATE SAMPLED: 06/10/93
DATE REPORTED: JUNE 27 1993
REVISION: 0

FL DRINKING WATER: #86144
FL ENVIRONMENTAL: #E86006
GEORGIA: #828,829
SOUTH CAROLINA: #96015
EPA: #FL095
FDER CQAP: #870206G
DATE RECEIVED: 06/11/93
SAMPLE MATRIX: SOLID

ANALYTE	METHOD	RESULT (- = <)	UNITS	REGULATORY CONC.	
ARSENIC TCLP	1311/7060	-0.002	mg/l	5.0	mg/l
BARIUM TCLP	1311/7080	0.70	mg/l	100.0	mg/l
CADMIUM TCLP	1311/7131	-0.0001	mg/l	1.0	mg/l
CHROMIUM TCLP	1311/7191	-0.001	mg/l	5.0	mg/l
LEAD TCLP	1311/7421	-0.001	mg/l	5.0	mg/l
MERCURY TCLP	1311/7471	-0.0002	mg/l	0.2	mg/l
SELENIUM TCLP	1311/7740	-0.002	mg/l	1.0	mg/l
SILVER TCLP	1311/7760	-0.01	mg/l	5.0	mg/l
CHLORDANE TCLP	1311/608			30	ug/l
2,4-D TCLP	1311/615			10000	ug/l
ENDRIN TCLP	1311/608			20	ug/l
HEPTACHLOR TCLP	1311/608			8	ug/l
LINDANE TCLP	1311/608			400	ug/l
METHOXYCHLOR TCLP	1311/608			10000	ug/l
TOXAPHENE TCLP	1311/608			500	ug/l
SILVEX TCLP	1311/615			1000	ug/l
BENZENE TCLP	1311/624	7.6	ug/l	500	ug/l
CARBN TETRACHLORIDE TCLP	1311/624	-0.5	ug/l	500	ug/l
CHLOROBENZENE TCLP	1311/624	-0.5	ug/l	100000	ug/l
CHLOROFORM TCLP	1311/624	-0.5	ug/l	6000	ug/l
1,2-DICHLOROETHANE TCLP	1311/624	-0.5	ug/l	500	ug/l
1,1-DICHLORETHYLENE TCLP	1311/624	-0.5	ug/l	700	ug/l
HEXACHLOROETHANE TCLP	1311/624	-0.5	ug/l	3000	ug/l
METHYL ETHYL KETONE TCLP	1311/624	28.9	ug/l	200000	ug/l
TETRACHLOROETHYLENE TCLP	1311/624	2.5	ug/l	700	ug/l
TRICHLOROETHYLENE TCLP	1311/624	-0.5	ug/l	500	ug/l
VINYL CHLORIDE TCLP	1311/624	-0.5	ug/l	200	ug/l
O-CRESOL TCLP	1311/625	30.0	ug/l	200000	ug/l
M-CRESOL TCLP	1311/625	-1	ug/l	200000	ug/l
P-CRESOL TCLP	1311/625	44.2	ug/l	200000	ug/l
1,4-DICHLOROBENZENE TCLP	1311/625	-0.5	ug/l	7500	ug/l
2,4-DINITROTOLUENE TCLP	1311/625	-5	ug/l	130	ug/l
HEXACHLOROBENZENE TCLP	1311/625	-1	ug/l	130	ug/l
HEXACHLOROBUTADIENE TCLP	1311/625	-0.5	ug/l	500	ug/l
NITROBENZENE TCLP	1311/625	-1.0	ug/l	2000	ug/l
PENTACHLOROPHENOL TCLP	1311/625	-1	ug/l	100000	ug/l
PYRIDINE TCLP	1311/625	-0.5	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.

LYEE A. JOHNSON
LAB MANAGER

1460 W. McNab Road, Ft. Lauderdale, FL 33309 • Phone: (305) 978-6400 • 630 Indian Street, Savannah, Ga. 31401 • Phone: (912) 238-5050

Copy

Department of Environmental Protection

Jeb Bush
Governor

Southwest District
3804 Coconut Palm Drive
Tampa, Florida 33619

David B. Struhs
Secretary

March 28, 2001

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

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

Dear Mr. Allen:

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

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

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

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

Sincerely yours,

Deborah A. Getzoff
Director of District Management
Southwest District

DAG/jmd

Enclosure

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

Department of Environmental Protection

Jeb Bush
Governor

Southwest District
3804 Coconut Palm Drive
Tampa, Florida 33619

David B. Struhs
Secretary

HAZARDOUS WASTE INSPECTION REPORT

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

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

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

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

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

NOTIFIED AS: ☐ N/A	**CURRENT STATUS:**
☐ 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: Processor, Transporter, Marketer	☒ used oil: Processor, Transporter, Marketer
☒ used oil filter: Processor, Transporter	☒ used oil filter: Processor, Transporter

2. **APPLICABLE REGULATIONS:**

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

3. **RESPONSIBLE OFFICIAL:**

Garry Allen - President

4. **INSPECTION PARTICIPANTS:**

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

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

6. **SIC Code:** 2999

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

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

9. PROCESS DESCRIPTION:

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

11. RECOMMENDED CORRECTIVE ACTIONS:

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

Report prepared by: _____
Al Gephart
Engineer IV

Report prepared by: _____
Jim Dregne
Environmental Specialist III

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

USED OIL PROCESSOR CHECKLIST

Facility Name: IPC Date: 9/25/00

Facility Representative: Aiken/Mobley Facility ID: FLD 065 680 613

Inspector: TAM/EVANS/GEPHART/DREGNE Registration #

40 CFR 279 Subpart F -- Processor Standards

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

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

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

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

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

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

   * HAS A used oil OPERATING PERMIT # 93015-4006-001

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

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

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

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

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

   In good condition? Y✓ N____

   Closed or otherwise protected from weather? Y✓ N____

   Labeled "Used Oil Filters"? Y✓ N____

   Stored on an oil impervious surface? Y✓ N____

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

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

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

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

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

Facility Name: IPC
Date: 9/25/00

Oil Management Standards - 279.54

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

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

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

3. Are containers and tanks in good condition and not leaking? (279.54(b)) Y N ✓ *
   * 5 GALLON BUCKET IN TRAILER
4. Are containers provided with secondary containment consisting of walls and floor at a minimum? (279.54(c)) Y ✓ N

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

5. Are ASTs, UST tank fill lines and containers labeled "used oil? (279.54(f)) Y N ✓ *
   * 5 GALLON BUCKETS NOT LABELED ON SITE & IN LAB
6. Does the facility stop operations and clean up releases of used oil, repairing or replacing any leaking units as applicable? (279.54(g)) Y ✓ N

General Facility Standards - 279.52

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

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

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

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

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

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

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

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

Facility Name: IPC
Date: 9/25/00

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

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

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

Contingency Plans and Emergency Response – 279.52(b)

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

Facility Name: [redacted]PC

Date: 9/25/00

Rebuttable Presumption and Analysis Plan – 279.53, 279.55

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

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

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

   Sampling methods? Y ✓ N ____

   Frequency of sampling? Y ✓ N ____

   Analytical Methods? Y ✓ N ____

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

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

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

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

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

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

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

   Sampling methods? Y ✓ N ____

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

   Frequency of sampling? Y ✓ N ____

   Analytical Methods? Y ✓ N ____

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

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

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

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

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

Facility Name: TPC
Date: 9/25/00

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

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

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

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

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

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

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

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

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

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

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

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

   Cleaning and decontaminating tanks and ancillary equipment? Y ✓ N

   Removing contaminated soils? Y ✓ N

   Eliminating the need for further maintenance? Y ✓ N

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

USED OIL TRANSPORTER CHECKLIST

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

Facility Representative: ALLEN Facility ID # FLD 065 650 613

Inspector: TAM / EVANS / GEPHART / DREGE

40 CFR 279 Subpart E -- Transporter Standards

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

   On site transport?

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

   In good condition? Y ✓ N____

   Closed or otherwise protected from weather? Y ✓ N____

   Labeled "Used Oil Filters"? Y ✓ N____

   Stored on an oil impervious surface? Y ✓ N____

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

Transporter Recordkeeping -- 279.46

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

Facility: IPC [redacted] S
Date: 9/25/00

Rebuttable Presumption -- 279.44

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

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

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

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

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

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

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

Transfer Facility Standards -- 279.45

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

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

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

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

   Is secondary containment provided and adequate? Y____ N____

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

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

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

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

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

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

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

ROGER P. STEWART
EXECUTIVE DIRECTOR
ADMINISTRATIVE OFFICES
AND
WATER MANAGEMENT DIVISION
1900 - 9TH AVENUE
TAMPA, FLORIDA 33605
TELEPHONE (813) 272-5960

AIR MANAGEMENT DIVISION
TELEPHONE (813) 272-5530

WASTE MANAGEMENT DIVISION
TELEPHONE (813) 272-5788

ECOSYSTEMS MANAGEMENT DIVISION
TELEPHONE (813) 272-7104

April 4, 1995

Mr. Frank Shibetti
Vice President
International Oil Service
105 South Alexander Street
Plant City, Florida 33566

Dear Mr. Shibetti:

SUBJECT: WARNING NOTICE # 14816

On December 9, 1994, EPC received information from Dr. Dokumaci, regarding waste disposal from a property located at 806 East Hillsborough Avenue, Tampa. The information consisted of several receipts, one of which indicated that your company picked up 350 gallons of what was referred to as "oily waste water". The disposal method and location was not on the receipt (copy attached).

EPC conducted an on site inspection of the property on April 5, 1994, and obtained information that the drums may have contained hazardous waste. Subsequently, EPC requested that the property owner conduct a hazardous waste determination on the contents of the drums and submit the results for review, prior to disposal of the drums. However, the waste determination was not completed and the drums were disposed. Dr. Dokumaci's failure to perform a hazardous waste determination was referred to FDEP's Hazardous Waste Compliance Section for follow up.

Upon discovering that International Oil Service picked up the waste without a proper waste determination, Ms. Carole Mercer of EPC's SQG/HW section contacted you by telephone. During the conversation, you indicated that your waste determination normally consists of performing a TOX on site and that your drivers "put their fingers in it and sniff it too". Further, you said that "your drivers know when it is not used oil".

EPC is concerned that International Oil Services may be picking up and improperly handling hazardous waste. Therefore, Warning Notice # 14816 is being issued for alleged violations of EPC's Act and Chapter 1-7, Solid Waste Rule, and Chapter 62-730, Florida Administrative Code.

Within 30 days of the receipt of this letter and warning notice, please submit the following information in writing:

1. The methods for storage and disposal of the 350 gallons of waste picked up from Dr. Dokumaci. Please include the name, address and telephone number of the disposal facility and all return manifests or documentation.

2. International Oil Service's policies and procedures for screening and acceptance of waste materials. Specifically, how are drums of unknown waste materials determined to be non-hazardous?

Should you have any questions, please contact me at 272-5788. Your cooperation is appreciated.

Sincerely,

Brenda Fonda

Brenda Fonda
Environmental Specialist II

bf/

xc: Beth Knauss, FDEP, Hazardous Waste Compliance Section
Ron Cope, EPC, Solid Waste Section

№ 14816

Roger P. Stewart
Executive Director
272-5960

Date Issued: March 31, 1995
S 36 T 28 R 18

ENVIRONMENTAL PROTECTION COMMISSION OF HILLSBOROUGH COUNTY

WARNING NOTICE

Responsible Party (Company/Person) International Oil/Frank Shibetti, Vice President

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

Phone: (813) 754-1504

Location of alleged violation: 806 E. Hillsborough Avenue - Former BP Station

Date and time of alleged violation: August 29, 1994 - Date of waste pickup, Discovered by EPC on December 9, 1994.

Alleged violation pursuant to:

Chapter 84-446 Laws of Florida (Act):

____(Act) Section 13 Unauthorized open burning
____(Act) Section 16 Causing or allowing nuisance or injury
____(Act) Section 17 Causing water/air/noise pollution
__X__(Act) Section 17 Violating rule/standard/order:
Chapter 1-7 : Solid Waste Rule
Chapter_____:
Other: Chapter 62-730, Florida Administrative Code

The violations here alleged may not include possible concurrent violations of other applicable environmental laws: local, state or federal including those of the Environmental Protection Commission. Facts believed to constitute alleged violation: Approximately 350 gallons of potentially hazardous waste was picked up without a proper hazardous waste determination and disposed of by a method unknown to the EPC

By copy of this Notice, the responsible party is informed that Commission staff believes that based upon the information available, a violation may have occurred. If substantiated, appropriate administrative or legal action will occur to assure compliance with the Environmental Protection Act of Hillsborough County and the Rules of the Environmental Protection Commission of Hillsborough County. If you believe that the above does not constitute a violation as alleged, you are encouraged to immediately contact the investigator named below. If the violation is substantiated, cooperative resolution and correction may avoid enforcement action in this matter.

Because continuation of a violation subsequent to this Notice may be considered to be an intentional violation, it is recommended that you cease the above activity and until this matter is resolved you:
Refer to attached cover letter.

Investigator: Brenda Fonda Phone #: 272-5788 Received by: CERTIFIED MAIL #

P 012 860 943

EPC Form No. WN 5/92

INTERNATIONAL PETROLEUM
HILLS CNTY

COPY

INTERNATIONAL PETROLEUM CORPORATION

CERTIFIED RETURNED RECEIPT
P 295 049 096

April 17, 1995

Brenda Fonda
Environmental Specialist II
Environmental Protection Commission
Hillsborough County
1900 9th Avenue
Tampa, Florida 33605

RECEIVED
APR 24 1995
Department of Environmental Protection
SOUTHWEST DISTRICT
BY _____

RE: Warning Notice # 14816

Dear Ms. Fonda:

This is to acknowledge and respond to the Warning Notice issued on March 31, 1995. I am the president of International Petroleum Corporation and the general manager of its used oil re-refinery located at 105 South Alexander Street, Plant City, Florida.

Our facility re-refines and recycles used oil and oily wastewater and does so in strict compliance with federal, state, and county regulations. Built in 1987, it is a state-of-the-art re-refinery, the only one of its kind in Florida. It has a closed-loop three-stage distillation system which re-refines used oil into various grades of on-specification used oil fuel, and discharges distilled water to a POTW for disposal. We have a full laboratory on-site to ensure the quality of the incoming material and the product produced.

We are proud of the operating history of our plant and continually seek to improve the services and the product we provide our customers. As you know, we are not permitted under RCRA or Rule 62-730, F.A.C., to accept, transport, store, or dispose of hazardous wastes. So we do everything possible to ensure that we do not. That is why the EPC Warning Notice about a pickup at 806 East Hillsborough Avenue, Tampa, greatly concerns me.

Immediately after receiving the Warning Notice, I initiated a personal investigation of the actions and circumstances surrounding the pickup. All indications are that we picked up 350 gallons of petroleum contaminated water, not hazardous waste.

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

You asked that we submit written information addressing two items, which are responded to below:

1. **The methods of storage and disposal of the 350 gallons of waste picked up from Dr. Dokumaci. Please include the name, and address and telephone number of the disposal facility and all return manifests or documentation.**

Response:

During the morning of August 29, 1994, Albert Davila, a used oil collector with more than four years experience, pumped 350 gallons of petroleum contaminated water (oily water) from seven barrels located at a former B.P. service station at 806 East Hillsborough Avenue. After passing a Halogen screening test, the oily water was pumped into the forward compartment of his oil tanker and transported to our re-refinery at 105 South Alexander Street. (Telephone: (813) 229-1739).

After passing another and more complete Halogen test at the re-refinery, the oily water was pumped to a feed tank and re-refined into on-specification used oil fuel and distilled water, which was discharged to the POTW operated by Plant City.

There are no return manifests because we do not accept or process RCRA Subtitle C wastes. We complete, instead, a "Receiving Manifest" at the time of pickup. These manifests describe the nature and amount of the materials to be transported and contain a certification by the generator that the materials have not been mixed with hazardous waste, are properly described on the manifest, and transportable in compliance with EPA and DOT regulations.

Without a completed manifest and a properly signed Certification from the generator, our collectors will not accept or transport materials to our re-refinery. (You already have received a copy of the completed Manifest for the August 29, 1994 pickup.)

1. **International Oil Service's policies and procedures for screening and acceptance of waste materials. Specifically, how are drums of unknown waste materials determined to be non-hazardous?**

Response:

Our policies and procedures for screening and accepting materials are comprehensive in scope and have been developed through years of operating experience. These three distinct elements:

(1) Recruitment and training program, for both new and experienced used oil collectors;

(2) Off-site screening of materials before pickup; and

(3) On-site retesting of materials before unloading at re-refinery.

A. Recruitment and Training Program

During recruitment, we carefully select applicants who are capable of understanding the detailed federal and state regulations which govern the handling of used oil. Both new and experienced oil collectors are furnished with their own copy of our Used Oil Training Manual. This manual contains and explains federal and state regulations which apply to the pickup, transport and refining or recycling of used oil, including oily waters.

We have a longstanding contract with an environmental consulting firm, Malatino and Associates, which conducts periodic workshops for all of our collectors to ensure that they are kept abreast of regulatory requirements and are aware of the precautions which must be taken to properly handle used oil. Each driver qualifies for and maintains his or her certification as a used oil collector.

We are fortunate to employ ten collectors, most of whom have many years of experience in their field and are extremely knowledgeable about matters affecting their profession. They take their responsibilities seriously.

When we hire a new collector, which rarely happens, we do not allow him or her to independently operate a collection tanker until he or she completes "classroom" training and on-the-job training with several experienced collectors. The trainee will accompany the collector to a variety of pickup establishments, including service stations, dealerships, quick-lube shops, and various automotive and truck repair facilities. There, the trainee will observe and learn how to talk to and question facility employees about the nature of the materials to be transported.

This informational exchange is critical and we expect collectors to become proficient at it. For example, the trainee is taught how to question employees about what materials are placed into the used oil tank or drums. The trainee will observe the business operation to determine if any hazardous materials are generated or likely to be disposed of. If paints, solvents, caustics, acids, or containers of other hazardous materials are spotted, the collector will ask about their disposition--all for the purpose of ascertaining whether hazardous materials have been

added to the used oil. No trainee is allowed to operate a collection vehicle until he or she has mastered these skills.

B. Off-Site Screening

Questioning of collectors is an important part of the off-site screening process. In addition, each collector is trained to use a T.I.F. Industries HLD 440 Halogen detector prior to picking up any material. The Halogen detector will sound an alarm if the used oil contains more than 1,000 ppm Halogens, which raises a rebuttable presumption that it has been mixed with Halogenated hazardous wastes. 40 C.F.R. § 279.10. If the alarm does not sound, and the material otherwise appears to be used oil or oily water, the collector will pump the material to the tank truck and transport it to the re-refinery.

If the Halogen alarm sounds, the collector will pipet a one ounce sample of the material, label it, and deliver it to the laboratory at the re-refinery for quantifiable testing on the Dohrmann MCTS 130/120 automated chlorine analyzer. The collector will not accept or pick up material that fails the off-site Halogen screening test or is otherwise suspected of having been mixed with hazardous waste. Such material will be rejected until and unless the subsequent Halogen testing by the more accurate Dohrmann MCTS analyzer shows the Halogen content to be 1,000 ppm or less.

This procedure ensures that our collectors do not pick up and transport any used oil to which the rebuttable presumption of 40 C.F.R. § 279.10 applies.

C. On-site Halogen Testing

The collector transports to the re-refinery only materials which have (1) passed the off-site observation and questioning criteria and (2) passed the T.I.F. Halogen detector test. As mentioned, when received at the re-refinery the material will undergo further quantifiable testing for total Halogens before discharge into a feed tank for reprocessing. This testing is performed by the exacting Dohrmann MCTS analyzer, which purchased new costs approximately $30,000. Because of its costs, few facilities in the State use it. We purchased it to give us the maximum assurance that we do not process used oil containing or mixed with hazardous wastes.

Specifically, we do not pick up or process "unknown" wastewater. If the waste is unknown, we have no reasonable basis to conclude that it is used oil or oily water, which is all we are authorized to transport and re-refine. The determination that the material is used oil or oily water, and not hazardous waste, is based on (1) knowledge of the business or activity which generates

the waste, based on the collector's observations and questioning of employees at the establishment; (2) the generator's written Certification that the material is used oil which has not been mixed with hazardous wastes; (3) screen testing the used oil for total Halogen content before pickup; and (4) quantitation testing for total Halogens at the re-refinery before unloading.

FACTS SURROUNDING THE PICKUP AT THE FORMER B.P. SERVICE STATION

In conducting my investigation of the August 29, 1994 pickup at the former B.P. service station, I interviewed our collector Albert Davila and reviewed the transport and Receiving Manifest completed at the pickup. The following facts indicate that the material picked up on August 29, 1994 consisted of petroleum contaminated water, or oily water and that it had not been mixed with hazardous wastes.

During the morning of August 29, 1994, Mr. Davila, a collector with over four years of experience, received a call in request from a Dr. Dokumaci, owner of a former B.P. service station located at 806 East Hillsborough Avenue, Tampa. Dr. Dokumaci's request asked him to pump seven drums of contaminated water at the site.

Mr. Davila then proceeded to the location. On arrival, he telephoned the owner's representative (a son-in-law), as previously instructed. While waiting, he inspected approximately 20 barrels on the site: seven contained what appeared to be petroleum contaminated water; 13 contained solids or sludge material. He determined that he would not accept or remove any of the 13 drums containing residue or sludge.

With four years experience as a used oil collector, he is familiar with the characteristics of used oil or petroleum contaminated water. Oily water has a distinct and recognizable odor. There is a sharp demarkation between the water and the oil, which floats on the surface. In this instance, he noted that the liquid in the seven barrels exhibited the sharp demarkation typically exhibited by oily water. On closer examination, he recognized the odor from the floating petroleum product. Most of the material was water, with the relatively narrow band of oil floating on top.

The oil collector then screened the water in each of the seven barrels using his T.I.F. HLD 440 Halogen detector and obtained a negative reading (1,000 ppm or less total Halogens). He then pumped the petroleum contaminated water to his tanker and the owner's representative signed the manifest certifying that the material was not hazardous waste or mixed with hazardous waste but rather petroleum contaminated water, as described on the manifest.

As the material was being pumped into the tanker, the collector placed his gloved hand in the stream. His glove became coated with a thin layer of oil and the water "beaded" on it, confirming the other oily water indicators. (By training and experience, he was aware that solvent mixtures behave differently. They do not clearly separate into distinct layers, and solvents remove oil: they do not "bead" like water.)

When the collector transported the oily water to the refinery it was retested for total Halogens, this time quantitatively by the Dohrmann MCTS analyzer which confirmed levels well below the 1,000 ppm level. Further testing showed that the mixture was 75% water and 25% oil, as reflected on the Permanent Daily Report Sheet. (Copy enclosed.)

In this instance, the collector reasonably believed that the seven sealed drums contained an oily water mixture, as attested to by the generator. Visual observation, odor, and touch provided further collaboration. Total Halogen testing, performed twice by different instruments, indicated a total Halogen content consistent with an oily water mixture not mixed with hazardous wastes.

We hope that this information will satisfy your concern about the pickup on August 29, 1994. We would be pleased if you could arrange a visit so that we could show you our facility. We are proud of what we have accomplished but know there is always room for improvement, and would welcome your suggestions.

Sincerely,

Garry R. Allen
President

xc: Ms. Beth Knauss, DEP
Hazardous Waste Compliance Section

INTERNATIONAL PETROLEUM CORPORATION
PLANT CITY, FLORIDA

PERMANENT DAILY REPORT SHEET

DAY: MONDAY DATE: 8 29 9

USED OIL RECEIVED BY SMALL TRUCK: GROSS GALLONS 18562 DRY + 14936 DEDUCTIONS 3626

	DRIVER'S NAME	TRUCK #	INCHES	GROSS GALLONS	DEDUCTIONS	DRY GALLONS	GRAVITY	BS & W	TANK
1.	Pilcher	m-13	52 / 41	427 / 1021	(106) — (162) —	21 / 1859		95% / 8%	83
2.	Floyd	m1005	54¾ / 19"	2560 / 550	(258) -51 (517) —	2304 / 33		10% / 44⅓	83
3.	Nick	F190	53" / 53"	630 / 2388	(151) 151 (245) -24	479 / 2170		24% / 9%	83
4.	Chick	m21	47 / 50	400 / 1439	(44) -12 (146) —	356 / 2293		11% / 6%	83
5.	Jerry	m16	/	—	—	Vac		/	—
6.	Randy	m97	52 / 43	427 / 2131	(410) — (128)	17 / 2003		76% / 6%	83
7.	Glyn	m89	/	—	— Out			/	—
8.	Jeff	m33	46" /	2525	(379) 177	2146		16%	83
9.	Albert	m16	52 / 34	427 / 1640	(320) — (492) —	107 / 1148		75% / 30%	83
10.			/					/	

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

Attn: Tony Malatino, CHMS

Report Date: 03/12/93

Collection Information:

Sample Date: 02/23/93
Sample Time: 1430
Sampled By : AM

PEL Lab # : 504430
Client ID : S1-S5 Composite
Project ID :
Location : IPC-105 S. Alexander St.
Matrix : Soil

***NOTE: EPA Method 1311, TCLP

ND = Less than MDL

Lab#	Parameter	Method	Results	Units	MDL
504430	Vinyl Chloride	EPA 8240	ND	mg/l	0.0026
	1,1-Dichloroethene	EPA 8240	ND	mg/l	0.0022
	2-Butanone (MEK)	EPA 8240	ND	mg/l	0.0050
	Chloroform	EPA 8240	ND	mg/l	0.0023
	1,2-Dichloroethane	EPA 8240	ND	mg/l	0.0023
	Carbon Tetrachloride	EPA 8240	ND	mg/l	0.0062
	Benzene	EPA 8240	ND	mg/l	0.0019
	Trichloroethene	EPA 8240	ND	mg/l	0.0044
	Tetrachloroethene	EPA 8240	ND	mg/l	0.0020
	Chlorobenzene	EPA 8240	ND	mg/l	0.0020
	1,4 Dichlorobenzene	EPA 8270	ND	mg/l	0.0150
	Hexachloroethane	EPA 8270	ND	mg/l	0.0200
	Nitrobenzene	EPA 8270	ND	mg/l	0.0100
	Hexachlorobutadiene	EPA 8270	ND	mg/l	0.0130
	2,4,6-Trichlorophenol	EPA 8270	ND	mg/l	0.0060
	2,4,5-Trichlorophenol	EPA 8270	ND	mg/l	0.0060
	2,4,-Dinitrotolulene	EPA 8270	ND	mg/l	0.0080
	Hexachlorobenzene	EPA 8270	ND	mg/l	0.0150
	Pentachlorophenol	EPA 8270	ND	mg/l	0.0170

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

b#	Parameter	Method	Results	Units	MDL
4430	Pyridine	EPA 8270	ND	mg/l	0.0500
	2-Methylphenol	EPA 8270	ND	mg/l	0.0100
	m-p-cresol	EPA 8270	ND	mg/l	0.0100
	Total Cresol	EPA 8270	ND	mg/l	0.0100
	Silver	EPA 6010	ND	mg/l	0.0140
	Arsenic	EPA 6010	0.137	mg/l	0.1000
	Barium	EPA 6010	0.372	mg/l	0.0110
	Cadmium	EPA 6010	ND	mg/l	0.0040
	Chromium	EPA 6010	ND	mg/l	0.0090
	Mercury	EPA 245.2	ND	mg/l	0.0002
	Lead	EPA 6010	0.115	mg/l	0.0570
	Selenium	EPA 6010	0.154	mg/l	0.1000

Respectfully submitted,

Vincent M. Giampa, Laboratory Supervisor

Progress Environmental Laboratories

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

- QUALITY CONTROL REPORT -
(HRS #E84207 and FDER CompQap #900306G)

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

Attn: Tony Malatino, CHMS

Report Date: 03/12/93

Collection Information:

Sample Date: 02/23/93
Sample Time: 1430
Sampled By : AM

PEL Lab # : 504430
Client ID : S1-S5 Composite
Project ID :
Location : IPC-105 S. Alexander St.
Matrix : Soil

ND = Less than MDL

Lab#	Parameter	Method	% Acc.
504430	Vinyl Chloride	EPA 8240	83.7
	1,1-Dichloroethene	EPA 8240	88.3
	2-Butanone (MEK)	EPA 8240	101.3
	Chloroform	EPA 8240	89.7
	1,2-Dichloroethane	EPA 8240	90.9
	Carbon Tetrachloride	EPA 8240	92.6
	Benzene	EPA 8240	92.6
	Trichloroethene	EPA 8240	90.7
	Tetrachloroethene	EPA 8240	93.4
	Chlorobenzene	EPA 8240	88.8
	1,4 Dichlorobenzene	EPA 8270	56.5
	Hexachloroethane	EPA 8270	53.0
	Nitrobenzene	EPA 8270	56.9
	Hexachlorobutadiene	EPA 8270	67.9
	2,4,6-Trichlorophenol	EPA 8270	72.5
	2,4,5-Trichlorophenol	EPA 8270	66.4
	2,4,-Dinitrotolulene	EPA 8270	52.0
	Hexachlorobenzene	EPA 8270	74.4
	Pentachlorophenol	EPA 8270	46.5
	Pyridine	EPA 8270	14.4

Respectfully submitted, Vince Giampa
Vincent M. Giampa, Laboratory Supervisor

Lab#	Parameter	Method	% Acc.
504430	2-Methylphenol	EPA 8270	48.0
	m-p-cresol	EPA 8270	55.4
	Total Cresol	EPA 8270	51.7
	Silver	EPA 6010	76.2
	Arsenic	EPA 6010	98.7
	Barium	EPA 6010	82.1
	Cadmium	EPA 6010	93.6
	Chromium	EPA 6010	91.6
	Mercury	EPA 245.2	95.5
	Lead	EPA 6010	72.1
	Selenium	EPA 6010	102.3

Respectfully submitted, Vince Giampa

Vincent M. Giampa, Laboratory Supervisor

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.

Progress Environmental Laboratories

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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.
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Progress Environmental Laboratories

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Tampa, Florida 33619
(813) 247-2805
FAX: (813) 248-1537

Table 2 (TCLP BNA)
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
D027	1,4-Dichlorobenzene	106-46-7	7.5	B/N/A
D034	Hexachloroethane	67-72-1	3.0	B/N/A
D036	Nitrobenzene	96-95-3	2.0	B/N/A
D033	Hexachlorobutadiene	87-68-3	0.50	B/N/A
D042	2,4,6-Trichlorophenol	88-06-2	2.0	B/N/A
D041	2,4,5-Trichlorophenol	95-95-4	400.0	B/N/A
D030	2,4-Dinitrotoluene	121-14-2	0.13	B/N/A
D032	Hexachlorobenzene	118-74-1	0.13[5]	B/N/A
D037	Pentachlorophenol	87-86-5	100.0[6]	B/N/A
D038	Pyridine	110-86-1	5.0[5]	B/N/A
D023	o-Cresol	95-46-7	200.0	B/N/A
D024	m-Cresol	106-39-4	200.0	B/N/A
D025	p-Cresol	106-44-5	200.0	B/N/A
D026	Cresol	1319-77-3	200.0[4]	B/N/A

*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
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FAX: (813) 248-1537

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

- PRELIMINARY REPORT -
(HRS #E84207 and FDER CompQap #900306G)

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

Attn: Tony Malatino, CHMS

Report Date: 03/09/93

Collection Information:

PEL Lab # : 504430
Client ID : S1-S5 Composite
Project ID :
Location : IPC-105 S. Alexander St.
Matrix : Soil

Sample Date: 02/23/93
Sample Time: 1430
Sampled By : AM

ND = Less than MDL

***NOTE: EPA Method 1311, TCLP

Lab#	Parameter	Method	Results	Units	MDL
504430	Arsenic	EPA 6010		mg/l	0.1000
	Barium	EPA 6010		mg/l	0.0110
	Cadmium	EPA 6010		mg/l	0.0040
	Chromium	EPA 6010		mg/l	0.0090
	Lead	EPA 6010		mg/l	0.0570
	Selenium	EPA 6010		mg/l	0.1000
	Silver	EPA 6010		mg/l	0.0140
	Mercury	EPA 245.2	ND	mg/l	0.0002
	Vinyl Chloride	EPA 8240	ND	mg/l	0.0026
	1,1-Dichloroethene	EPA 8240	ND	mg/l	0.0022
	2-Butanone (MEK)	EPA 8240	ND	mg/l	0.0050
	Chloroform	EPA 8240	ND	mg/l	0.0023
	1,2-Dichloroethane	EPA 8240	ND	mg/l	0.0023
	Carbon Tetrachloride	EPA 8240	ND	mg/l	0.0062
	Benzene	EPA 8240	ND	mg/l	0.0019
	Trichloroethene	EPA 8240	ND	mg/l	0.0044
	Tetrachloroethene	EPA 8240	ND	mg/l	0.0020
	Chlorobenzene	EPA 8240	ND	mg/l	0.0020
	Pyridine	EPA 8270		mg/l	0.0500

Respectfully submitted, V Giampa
Vincent M. Giampa, Laboratory Supervisor

NOTE: EPA Method 1311, TCLP

Lab#	Parameter	Method	Results	Units	MDL
504430	2,4,6-Trichlorophenol	EPA 8270		mg/l	0.0060
	2,4,5-Trichlorophenol	EPA 8270		mg/l	0.0060
	1,4 Dichlorobenzene	EPA 8270		mg/l	0.0150
	2,4,-Dinitrotolulene	EPA 8270		mg/l	0.0080
	Hexachlorobenzene	EPA 8270		mg/l	0.0150
	Hexachlorobutadiene	EPA 8270		mg/l	0.0130
	Hexachloroethane	EPA 8270		mg/l	0.0200
	Nitrobenzene	EPA 8270		mg/l	0.0100
	Pentachlorophenol	EPA 8270		mg/l	0.0170
	m-p-cresol	EPA 8270		mg/l	0.0100
	Total Cresol	EPA 8270		mg/l	0.0100
	2-Methylphenol	EPA 8270		mg/l	0.0100

Respectfully submitted, V Giampa

Vincent M. Giampa, Laboratory Supervisor

Progress Environmental Laboratories

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

- QUALITY CONTROL REPORT -
(HRS #E84207 and FDER CompQap #900306G)

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

Attn: Tony Malatino, CHMS

Report Date: 03/09/93

Collection Information:

Sample Date: 02/23/93
Sample Time: 1430
Sampled By : AM

PEL Lab # : 504430
Client ID : S1-S5 Composite
Project ID :
Location : IPC-105 S. Alexander St.
Matrix : Soil

ND = Less than MDL

Lab#	Parameter	Method	% Acc.
504430	Arsenic	EPA 6010	
	Barium	EPA 6010	
	Cadmium	EPA 6010	
	Chromium	EPA 6010	
	Lead	EPA 6010	
	Selenium	EPA 6010	
	Silver	EPA 6010	
	Mercury	EPA 245.2	95.5
	Vinyl Chloride	EPA 8240	83.7
	1,1-Dichloroethene	EPA 8240	88.3
	2-Butanone (MEK)	EPA 8240	101.3
	Chloroform	EPA 8240	89.7
	1,2-Dichloroethane	EPA 8240	90.9
	Carbon Tetrachloride	EPA 8240	92.6
	Benzene	EPA 8240	92.6
	Trichloroethene	EPA 8240	90.7
	Tetrachloroethene	EPA 8240	93.4
	Chlorobenzene	EPA 8240	88.8
	Pyridine	EPA 8270	
	2,4,6-Trichlorophenol	EPA 8270	

Respectfully submitted, VMG
Vincent M. Giampa, Laboratory Supervisor

Lab#	Parameter	Method	% Acc.
504430	2,4,5-Trichlorophenol	EPA 8270	
	1,4 Dichlorobenzene	EPA 8270	
	2,4,-Dinitrotolulene	EPA 8270	
	Hexachlorobenzene	EPA 8270	
	Hexachlorobutadiene	EPA 8270	
	Hexachloroethane	EPA 8270	
	Nitrobenzene	EPA 8270	
	Pentachlorophenol	EPA 8270	
	m-p-cresol	EPA 8270	
	Total Cresol	EPA 8270	
	2-Methylphenol	EPA 8270	

Respectfully submitted, VG

Vincent M. Giampa, Laboratory Supervisor

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.

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

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 #131

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

~~SAMPLE KIT~~

Malatino & Assoc.

CHAIN OF CUSTODY RECORD

PROJ. NO. PROJECT NAME & ADDRESS
TONY MALATINO
I ?C-105 Sou , Le gl en ST

SAMPLERS: (Signature)

TCLPM
TCLP 8240
TCLP BNA

STA. NO	DATE	TIME	COMP.	GRAB	STATION LOCATION	NO. OF CONTAINERS	TCL - METALS, VOAs SEMI-VOLs	REMARKS
S-1 Thru S5	2	2/3			#SN ?? soil -5	2		S1 - S5 Composite -CO ? OSIT ? am ?e

RELINQUISHED BY : (Signature)	DATE / TIME	RECEIVED BY: (Signature)	RELINQUISHED BY : (Signature)	DATE / TIME	RECEIVED BY: (Signature)
Ken [signature]	2/23 93 930				

RELINQUISHED BY : (Signature)	DATE / TIME	RECEIVED BY: (Signature)	RELINQUISHED BY : (Signature)	DATE / TIME	RECEIVED BY: (Signature)

RELINQUISHED BY : (Signature)	DATE / TIME	RECEIVED FOR LABORATORY BY: (Signature)	DATE / TIME	REMARKS
	2/24 11:00			

WHITE . Accompanies Shipment - YELLOW: To Coordinator Field Files

TCLP VOLS

PROGRESS ENVIRONMENTAL LABORATORIES
- ANALYSIS WORK SHEET -
Due Date: 03/06/93

February 25, 1993

Client

RUN #

Lab#	Collect Date	Test	Initial Result	SD	Control/ True Val	Weight	Volume	Dilution	Dup.	Spike	
Malatino & Associates				40 Spk.							02000285
504430	02/23/93	824003	—	33.48							W/0300001
		824008	—	35.30							
		824017	—	40.50							
		824019	—	35.87							
		824022	—	36.35							
		824023	—	37.03							
		824024	.34	37.03							
		824027	—	36.37							
		824039	—	37.35							
		824041	—	35.50							

APPROVED

Reviewed by: _____ (Michael G. Sara)
Entered by: _____ (Victoria M. Saenz)
Approved by: VMG 3-8-93 (Vincent M. Giampa)

Mercury

PROGRESS ENVIRONMENTAL LABORATORIES
- ANALYSIS WORK SHEET -
Due Date: 03/06/93

February 25, 1993

Client

mg/L

RUN #

Lab#	Collect Date	Test	Initial Result	SD	Control/ True Val	Weight	Volume	Dilution	Dup.	Spike
Malatino & Associates										02000284
504430	02/23/93	HgTCLP	0.00		2		10ml			1.91

5044305 1.91 96%R 10ml

Reviewed by: MMS (Michael G. Sara)
Entered by: _____ (Victoria M. Saenz)
Approved by: VMG 3-4-93 (Vincent M. Giampa)

TCLP metals

PROGRESS ENVIRONMENTAL LABORATORIES

- ANALYSIS WORK SHEET -

Due Date: 03/06/93

February 25, 1993

Client

RUN #

Lab#	Collect Date	Test	Initial Result	SD	Control/ True Val	Weight	Volume	Dilution	Dup.	Spike
Malatino & Associates										02000283
504430	02/23/93	AsTCLP	.144	.137						5.073
		BaTCLP	.398	.372					1.603	~~.394~~
		CdTCLP	.005	.001						1.405
		CrTCLP	.005	.002						1.376
		PbTCLP	.124	.115						3.72
		SeTCLP	.072	.154						~~.303~~ 2.711
		AgTCLP	<.003	.007						1.15

use these

One digestion:

Ba → spiked ①

non-spiked ②

non-digested non-spiked ③

Ba — spiked ④

Reviewed by: _____ (Michael G. Sara)

Entered by: _____ (Victoria M. Saenz)

Approved by: VMS 3-6-93 (Vincent M. Giampa)

TCLP BN S

PROGRESS ENVIRONMENTAL LABORATORIES
- ANALYSIS WORK SHEET -
Due Date: 03/06/93

Ext. 3-2-93
filtered 3-5-93

February 25, 1993

Note: There are four liters for sample analysis and QA.!

Client / Lab#	Collect Date	Test	Initial Result	SD	Control/ True Val	Weight	Volume	Dilution	Dup.	Spike	RUN #
Malatino & Associates				Spike 35.5							02000286
504430	02/23/93	827082	—	5.03			1L				w/2000299
		827035	—	25.36							
		827036	—	23.24							
		827010	—	19.77							
		827049	—	18.20							
		827058	—	26.04							
		827030	—	23.76							
		827016	—	18.56							
		827019	—	19.92							
		827059	—	16.26							
		827084	—	19.40							
		827085	—	36.20 (70)							
		827083	—	16.80							
		827dat	3/11/93	3/11/93			↓				

504430 Sample (Dup.) 1L

504430 Spike (Dup.) 1L

Reviewed by: _____ (Michael G. Sara)
Entered by: VMS (Victoria M. Saenz)
Approved by: _____ (Vincent M. Giampa)

CERTIFIED # P [redacted] 982 126

INTERNATIONAL PETROLEUM CORPORATION

January 27, 1994

Ms. Elizabeth B. Knauss
Environmental Supervisor
Florida Department of Environmental Protection
3804 Coconut Palm Drive
Tampa, Florida 33619

RE: DEP Warning Notice #WN93-0023HW29SWD, Dated April 19, 1993
Final Report - Waste Characterization Program for
Sump Sludge/Pump Filter Basket Lint

Dear Ms. Knauss:

Enclosed is the final report - Waste Characterization Program prepared by Edward E. Clark Engineers - Scientists, Inc. This report presents the results of the five-month sampling program undertaken to provide you with more extensive TCLP data on the sludge which was the subject of DEP's Warning Notice. The results show that the sludge was and is properly determined to be non-hazardous as defined by RCRA's TCLP toxicity characteristic criteria.

The sludge was a combination of sump waste and pump filter basket lint. We had declared and disposed of it as non-hazardous based on our general and specific knowledge of its characteristics pursuant to 40 CFR 262.11(c)(2). The Department's February 19, 1993 sampling confirmed our non-hazardous determination. In our meeting with you on May 19, 1993, we agreed to retain a qualified consultant to perform a five-month sludge sampling program to provide you with additional assurances that it was non-hazardous. We retained Clark Engineers - Scientists to perform the work.

This extensive waste characterization program cost more than $7,000, but we did not hesitate to undertake it. This is because you expressed a willingness - if the results justify it - to consider withdrawing the Warning Notice from your records or taking other action to assure that our company's compliance record remains unblemished. We have given the highest priority to ensuring compliance with all regulatory requirements. Our employees receive extensive training and we use the finest equipment. Our efforts have been successful; the Warning Notice, alleging that the sludge might exhibit a hazardous characteristic, was the first non-compliance notice we have received from EPA. DEP, or the County.

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

The non-hazardous nature of the sludge has now been confirmed. If you wish, we will perform an annual TCLP analysis on the sludge. What we respectfully ask for now is that you take whatever action the in the Warning Notice file is needed to indicate that further testing showed the agency's suspicion to be unjustified and that the Warning Notice is withdrawn. We would like to be able to continue to represent to our clients that we have an unblemished record of compliance with regulatory requirements. We look forward to your response.

We appreciate you willingness to suspend the Warning Notice and your judgement until additional testing data was provided. Thank you for giving us the opportunity to provide it.

Sincerely,

Garry R. Allen
President

cc: Edward E. Clark, Clark Engineers - Scientists, Inc.
R. L. Caleen, Jr.

INTERNATIONAL PETROLEUM CORPORATION

June 4, 1993

Elizabeth B. Knauss, Environmental Supervisor
Waste Management/Hazardous Waste
Southwest District
Florida Department of Environmental Regulations
3804 Coconut Palm
Tampa, FL 33616

RE: International Petroleum Corporation; Warning Notice #WN93-0023HW29SWD, Dated April 19, 1993

Dear Ms. Knauss:

Thank you for meeting with us on May 19, 1993 concerning the referenced Warning Notice.

At the outset, I want to reemphasize how proud we are of our used oil re-refinery. No other facility in the southeast can compare with respect to the quality and variety of final product produced.

We collect used oil from consistently reliable sources (90% is crankcase oil). We test it repeatedly before accepting or off-loading it to our tanks. We share your concern about the potential for foreign or hazardous waste to be mixed with used oil and do everything possible to ensure that we do not accept or process any contaminated oil.

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

INTERNATIONAL PETROLEUM CORPORATION
WARNING NOTICE #WN93-0023HW29SWD
DATED APRIL 19, 1993

Our invitation for you to visit our plant is a sincere and continuing one. We want to share with you the process we have developed and the care we take to keep our plant spotless and in full compliance with all regulatory requirements. Despite several inspections, we have never received an enforcement citation from EPA, Hillsborough County, or DER. To achieve this, we have made a concerted effort and voluntarily spent monies competitors have not.

It is an accomplishment which we share with our clients and which they take into account in choosing our facility. We will do everything possible to keep our record unblemished and will cooperate with you in providing additional information necessary to demonstrate neither of the possible violations described in the Warning Notice actually occurred.

This additional information and a schedule for submitting it, as discussed at our meeting, is set out below:

1. **HAZARDOUS WASTE DETERMINATION, 40 C.F.R. 262.11**

Although 20 shipments of sludge (consisting of a combination of sump waste and pump filter basket lint) to Clark Environmental, Inc. had not been tested in accordance with subpart C of 40 C.F.R. Part 261, we declared it non-hazardous under the alternative provided by section 262.11(c)(2) - by applying our general and specific knowledge of the hazard characteristic of the waste in light of the material received and process used at our facility. The Department's subsequent February 11, 1993 sampling and analysis (along with the split sample) of this sludge was consistent with our non-hazardous determination, finding that TCLP metals, volatiles and semi-volatiles did not exceed maximum allowable concentrations.

In order to provide you with additional testing and analysis of this sludge over time, we agreed to retain a consultant, Edward E. Clark, Engineers-Scientists, Inc., to test the combined sludge (sump and pump filter basket lint) for TCLP metals and volatiles during a five-month period.

During the fourth week of each month (beginning in the fourth week of June 1993) each monthly accumulation of the combined sludge will be subjected to this TCLP testing. The consultant will notify you (or leave a message on your recording machine if you are unavailable) at least two days prior to the sampling event so that the Department can split samples, if it desires.

At the conclusion of this five-month sampling period, the results will be submitted to you for your review. You will evaluate the additional data for consistency and hazardous characteristics. Anticipating the future results of the testing will reflect the department's most recent results, you will then be able to conclude that an adequate demonstration has been made as to the non-hazardous nature of the sludge, as has been found with used oil filters in various national test programs, and that the possible violation described in the Warning Notice did not occur. As a result, you may reduce the frequency of any further TCLP testing and withdraw the Warning Notice.

We are willingly undertaking this additional testing at a cost in excess of $7,000, based on our belief that the additional analysis will provide you with the reasonable assurances needed to withdraw and dismiss the Warning Notice. In our industry, clients do not distinguish between a Warning Notice, a Notice of Violation, a Lawsuit or a Consent Order. The issuance of any has significant adverse effects. This is why we hope that, with additional data consistent with our earlier determination, the Warning Notice can be withdrawn or nullified in a way that it will be given no effect.

2. **DISCHARGE OF USED OIL TO SOILS OR GROUNDWATER, $403.751(1)(B),F.S.**

As was explained, the plant regularly absorbs any oil drippings from delivery trucks on the asphalt, and adheres to stormwater management practices designed to prevent any runoff that may be contaminated with oil. Since the inspection, we have taken even further steps, such as relocating the truck parking area, as well as performing additional paving so stormwater will be diverted (after absorption of any potential sheen) to a single grassy swale area.

As you know, our consultant (Anthony Malatino) sampled the soil in the area of suspected oil contamination, and the analysis showed none. You correctly noted, however, that Total Recoverable Petroleum Hydrocarbons (TRPH) were not analyzed.

For purposes of providing you with reasonable assurances that the suspected contaminated runoff did not occur, we agreed to collect a soil sample in the area of concern and have it analyzed for TRPH within 30 days. As with the sludge testing, we will provide you with at least two days prior notice so that you can split samples, if you wish. A sampling protocol prepared by Clark Engineers Scientist, Inc. is attached for your review.

Please review the protocol and provide any comments or changes you feel are necessary. By this letter, I am asking Mr. Edward Clark to call you if he does not receive any response from you within one week. Unless you talk to him, or instruct me otherwise, we will assume that he can proceed to sample in accordance with the protocol after June 11, 1993. We are not trying to rush you but only live up to our promise to conduct the soil testing and submit the results to you within 30 days.

Please let me know if anything in this letter should be changed to conform it to our agreement. I have tried to be accurate, but I may have misunderstood some aspect of it.

Thank you, again, for your assistance and continuing patience.

Sincerely,

Garry R. Allen
President

cc: Edward E. Clark, Clark Engineers-Scientists, Inc.
R. L. Caleen, Oertel, Hoffman, Fernandez & Cole, P.A.

INTERNATIONAL PETROLEUM CORPORATION
WARNING NOTICE #WN93-0023HW29SWD
DATED APRIL 19, 1993

Proposed Soil Sampling Protocol

International Petroleum Corporation (IPC) proposes to collect a soil sample from the grass area at the west end of the IPC facility. The soil sample will be collected from the area of the picture that was attached to the Warning Notice.

The soil sample (labeled SB-1) will be collected using a stainless steel hand-held split spoon sampler. The soil sample will be collected from the land surface to a depth of 1-foot below Land Surface (BLS). The split spoon sampler will be decontaminated prior to and after the sample is collected. The soil sample will be placed in a pre-cleaned glass sample jar, labelled and placed in a shipping container for overnight shipment to a Florida certified laboratory for analysis.

The soil sample will be collected in accordance with the Edward E. Clark Engineers-Scientists, Inc. (CLARK) approved Comprehensive Quality Assurance Plan (ComQAP) #870224G. The soil sample will be analyzed for Total Recoverable Petroleum Hydrocarbons (TRPH) utilizing EPA Method 9073.

Form Title: Facilities & Transporters
Receive Date: January 17, 1990
DER Application No.
(Feed in by DER)

Florida Department of Environmental Regulation
Twin Towers Office Bldg. • 2600 Blair Stone Road • Tallahassee, Florida 32399-2400

DER Form # 17-710.900(3)
Form Title: Annual Report by Used Oil Facilities and Transporters
Effective Date: January 17, 1990
DER Application No. (Feed in by DER)

Annual Report by Used Oil Facilities and Transporters

Please refer to instructions when completing this form

For reporting period January 1, 1992 through December 31, 1992

SECTION A
(To be filled out by Transporters and Collection and Recycling Facility Operators)

1. Company Name: International Petroleum Corporation
Mailing Address: 105 S. Alexander Street
Plant City, FL 33566
☐ Check if changed since last registration

2. Telephone No. (813) 754-1504

3. Used Oil Registration No.: 50005 -UO

4. Name of person preparing report (please print)
Garry R. Allen
Affiliation with business: President
Phone No., if different than 2 (____) ____

5. Type of operation (check as many as apply)
☒ Collection Facility
☒ Transporter
☒ Recycling Facility

SECTION B
(To be filled out by Collection Facility Operators Only)

Amount of Used Oil and Oily Waste (gallons) Collected from:	Automotive	Industrial	Mixed
6. Own Operations (Facility and Equipment)	850	0	0
7. Other Persons (Individuals or Other Companies/Agencies)	3805601	15610	11434750
8. Total Amount of Used Oil Collected During Reporting Period (add items 6 and 7)	3806451	15610	11434750

Florida Department of Environmental Regulation

DEPARTMENT OF ENVIRONMENTAL REGULATION

Form Title

Effective Date January 17, 1990

DER Application No. (Filled in by DER)

SECTION C
(This entire page to be filled out by Transporters and Recycling Facility Operators Only)

Amount of Used Oil and Oily Waste (gallons) Collected From the following sources:	Automotive	Industrial	Mixed
9. CO – Commercial (service stations, garages and shops)	3412284	13010	665
10. AG – Agricultural	95607		23353
11. IN – Industrial (manufacturing, construction, mining or other industrial processing operations	1895	2600	676397
12. MI – Military (all except ships and port facilities)			
13. PC – Public Used Oil Collection Centers			
14. TE – Non-Marine Transportation Terminals (railyards, airports and vehicle fleet terminals)	296665		115447
15. BP – Bulk Petroleum Storage Terminals (tank bottoms, etc.)			94001
16. OF – Sources Outside Florida			6765163
17. SH – Ships, Port Facilities, Marinas			
18. OT – Other Sources (specify)			
19. BI – Beginning Inventory			415990
20. TR or RE – Used Oil Transporter or Recycling Facility			3759724
21. Total Amount of Used Oil and Oily Waste Collected During Reporting Period (add items 9-20)	3806451	15610	11850740
Amount of Used Oil and Oily Waste (gallons) Marketed, Disposed or End Used:	Automotive	Industrial	Mixed
22. NE – Total amount of used oil or oily waste transferred to other facilities for processing			
23. MBI – Marketed as a Fuel In-State or On-Site Burner	1032362	15610	3269147
24. MBO – Marketed as a Fuel Out-of-State			
25. MINI – Marketed for an Industrial Process In-State or On-Site Industrial Processor (specify process) Phosphate flotation	2022441		6404395
26. MINO – Marketed for an Industrial Process Out-of-State (specify process)			
27. DS – Disposal - Underline type of material and specify disposal method and amount. Type: Bottom Sediment, Water, Oily Waste, Other. Method: ☐ Landfill ☒ Wastewater Treatment Unit ☐ Incinerator ☐ Other (specify)	751648		1301205
28. EI – Total Inventory on Hand (end of year)			875993
29. Total Amount of Used Oil and Oily Waste from Lines 22-28 (the sum of the three columns of this line should be approximately equal to the sum of the three columns on line 21)	3806451	15610	11850740
30. EU – End User (specify end use: burned, phosphate flotation, form oil, chain oil, trap dipping, disposal, other)			

To the best of my knowledge and belief, I certify the information provided in this report is a true, accurate and complete presentation of the information required by Section 17-710.520, Florida Administrative Code.

Garry R. Allen
Name of Authorized Person (Please print or type)

Signature of Authorized Person

6/3/9
Date

Intl Pet.

STATE OF FLORIDA
DEPARTMENT OF ENVIRONMENTAL REGULATION

SOUTHWEST DISTRICT
7601 HIGHWAY 301 NORTH
TAMPA, FLORIDA 33637-9544
813-985-7402
SunCom - 542-8000

February 24, 1987

Mr. Garry R. Allen
President
INTERNATIONAL PETROLEUM CORPORATION
105 South Alexander Street
Plant City, Florida 33566

RE: File No. IO29-114802

Dear Mr. Allen:

Your letter of December 4th, 1986, gave notification that, as of December 31st, 1986, International Petroleum Corporation would become a zero discharge facility. As you were informed in conjunction with your recent construction permit application, a zero discharge facility does not require an operation permit.

Groundwater contamination from the past operations will be addressed under an enforcement case. A consent order, which will cover contamination assessment and any necessary clean up as well as groundwater monitoring, is presently being negotiated with your company.

The referenced application has thus become superfluous, and we request withdrawal by March 3rd, 1987.

Sincerely,

Henry B. Dominick
Permitting Engineer
Industrial Waste Program

HD/aa

cc: Terry Cole, Oertel & Hoffman
Woodrow Batchelor, Hillsborough County Environmental Protection Commission
Southwest District Enforcement
Southwest District Groundwater

Progress Environmental Laboratories

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

- QUALITY CONTROL REPORT -
(HRS #E84207 and FDER CompQap #900306G)

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

Attn: Tony Malatino, CHMS

Report Date: 03/09/93

Collection Information:

Sample Date: 02/23/93
Sample Time: 1430
Sampled By : AM

PEL Lab # : 504430
Client ID : S1-S5 Composite
Project ID :
Location : IPC-105 S. Alexander St.
Matrix : Soil

ND = Less than MDL

Lab#	Parameter	Method	% Acc.
504430	Arsenic	EPA 6010	
	Barium	EPA 6010	
	Cadmium	EPA 6010	
	Chromium	EPA 6010	
	Lead	EPA 6010	
	Selenium	EPA 6010	
	Silver	EPA 6010	
	Mercury	EPA 245.2	95.5
	Vinyl Chloride	EPA 8240	83.7
	1,1-Dichloroethene	EPA 8240	88.3
	2-Butanone (MEK)	EPA 8240	101.3
	Chloroform	EPA 8240	89.7
	1,2-Dichloroethane	EPA 8240	90.9
	Carbon Tetrachloride	EPA 8240	92.6
	Benzene	EPA 8240	92.6
	Trichloroethene	EPA 8240	90.7
	Tetrachloroethene	EPA 8240	93.4
	Chlorobenzene	EPA 8240	88.8
	Pyridine	EPA 8270	
	2,4,6-Trichlorophenol	EPA 8270	

Respectfully submitted, V J Giampa
Vincent M. Giampa, Laboratory Supervisor

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

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.

Lab#	Parameter	Method	% Acc.
504430	2,4,5-Trichlorophenol	EPA 8270	
	1,4 Dichlorobenzene	EPA 8270	
	2,4,-Dinitrotolulene	EPA 8270	
	Hexachlorobenzene	EPA 8270	
	Hexachlorobutadiene	EPA 8270	
	Hexachloroethane	EPA 8270	
	Nitrobenzene	EPA 8270	
	Pentachlorophenol	EPA 8270	
	m-p-cresol	EPA 8270	
	Total Cresol	EPA 8270	
	2-Methylphenol	EPA 8270	

Respectfully submitted, VG

Vincent M. Giampa, Laboratory Supervisor

Progress Environmental Laboratories

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

- PRELIMINARY REPORT -
(HRS #E84207 and FDER CompQap #900306G)

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

Attn: Tony Malatino, CHMS

Report Date: 03/09/93

Collection Information:

PEL Lab # : 504430
Client ID : S1-S5 Composite
Project ID :
Location : IPC-105 S. Alexander St.
Matrix : Soil

Sample Date: 02/23/93
Sample Time: 1430
Sampled By : AM

ND = Less than MDL

***NOTE: EPA Method 1311, TCLP

Lab#	Parameter	Method	Results	Units	MDL
504430	Arsenic	EPA 6010		mg/l	0.1000
	Barium	EPA 6010		mg/l	0.0110
	Cadmium	EPA 6010		mg/l	0.0040
	Chromium	EPA 6010		mg/l	0.0090
	Lead	EPA 6010		mg/l	0.0570
	Selenium	EPA 6010		mg/l	0.1000
	Silver	EPA 6010		mg/l	0.0140
	Mercury	EPA 245.2	ND	mg/l	0.0002
	Vinyl Chloride	EPA 8240	ND	mg/l	0.0026
	1,1-Dichloroethene	EPA 8240	ND	mg/l	0.0022
	2-Butanone (MEK)	EPA 8240	ND	mg/l	0.0050
	Chloroform	EPA 8240	ND	mg/l	0.0023
	1,2-Dichloroethane	EPA 8240	ND	mg/l	0.0023
	Carbon Tetrachloride	EPA 8240	ND	mg/l	0.0062
	Benzene	EPA 8240	ND	mg/l	0.0019
	Trichloroethene	EPA 8240	ND	mg/l	0.0044
	Tetrachloroethene	EPA 8240	ND	mg/l	0.0020
	Chlorobenzene	EPA 8240	ND	mg/l	0.0020
	Pyridine	EPA 8270		mg/l	0.0500

Respectfully submitted, V Giampa
Vincent M. Giampa, Laboratory Supervisor

***NOTE: EPA Method 1311, TC

Lab#	Parameter	Method	Results	Units	MDL
504430	2,4,6-Trichlorophenol	EPA 8270		mg/l	0.0060
	2,4,5-Trichlorophenol	EPA 8270		mg/l	0.0060
	1,4 Dichlorobenzene	EPA 8270		mg/l	0.0150
	2,4,-Dinitrotolulene	EPA 8270		mg/l	0.0080
	Hexachlorobenzene	EPA 8270		mg/l	0.0150
	Hexachlorobutadiene	EPA 8270		mg/l	0.0130
	Hexachloroethane	EPA 8270		mg/l	0.0200
	Nitrobenzene	EPA 8270		mg/l	0.0100
	Pentachlorophenol	EPA 8270		mg/l	0.0170
	m-p-cresol	EPA 8270		mg/l	0.0100
	Total Cresol	EPA 8270		mg/l	0.0100
	2-Methylphenol	EPA 8270		mg/l	0.0100

Respectfully submitted, VG

Vincent M. Giampa, Laboratory Supervisor

3/31/93

FLORIDA DEPARTMENT OF ENVIRONMENTAL REGULATION
CENTRAL LABORATORY
2600 BLAIR STONE ROAD
TALLAHASSEE, FLORIDA 32399-2400

CHEMICAL ANALYSIS REPORT

Request ID: RQ-93-FEB-08-39
Job ID: 93-FEB-12-10 Project: OTHER
Job Name: International Petroleum Corp. - Job created on
Date Received: 12-FEB-1993 Customer ID: SW-TAM-WSM
Authorized: 18-MAR-1993 By: Tim Fitzpatrick

Submitted By: SW DIST. OFFICE (TAMPA) - WASTE MANAGEMEN
3804 Coconut Palm Drive
Tampa, Florida 33619

For Additional Information, Please Contact
G. William Coppenger, Ph.D.
Yuh-Hsu Pan, Ph.D.
Timothy W. Fitzpatrick
Liang-Tsair Lin, Ph.D.
Suncom 277-2571
(904) 487-2571

Certified By: Yhan Date: 3-22-93

Abbreviations & Storet Codes:

A - Value reported is the mean of two or more determinations
J - Estimated value
K - Actual value is known to be less than value given
L - Actual value is known to be greater than value given
N - Presumptive evidence of presence of material.
O - Sampled, but analysis lost or not performed.
Q - Sample held beyond normal holding time.
T - Value reported is less than the practical quantitation limit
U - Material was analyzed for but not detected;
The value reported is the minimum detection limit

Sample ID: 49730/93-FEB-12-10-01 Matrix: S-SOIL
Location: CLARK ENVIRONMENTAL
Field ID: STABILIZATION AREA
Collected: 11-FEB-1993 10:20 By: J.SCHOENBACHER
Authorized: 18-MAR-1993 By: Tim Fitzpatrick
Type: Grab Sample
Lab Comments:

Field Comments:

Analysis ID: HG-H-TCLP
Mercury in TCLP extracts by Method 7470, modified
Prepared: 23-FEB-1993 15:02 By: Jennifer Miller
Analyzed: 24-FEB-1993 15:10 By: Jennifer Miller
Authorized: 25-FEB-1993 By: Jack Merritt

Storet#	Analyte	Value	Units
	Mercury	0.001 U	mg/L

Analysis ID: TCLP-ICP
ICP multielement analysis of TCLP extracts, Method 6010
Prepared: 19-FEB-1993 16:33 By: John Perry
Analyzed: 24-FEB-1993 13:58 By: Lei Wei
Authorized: 18-MAR-1993 By: Tim Fitzpatrick

Storet#	Analyte	Value	Units
	Antimony	0	mg/L
	Aluminum	0	mg/L
	Arsenic	0.2 U	mg/L
	Barium	0.64	mg/L
	Cadmium	0.03 U	mg/L
	Chromium	0.1 U	mg/L
	Beryllium	0	mg/L
	Cobalt	0	mg/L
	Copper	0	mg/L
	Calcium	0	mg/L
	Lead	0.15 U	mg/L
	Manganese	0	mg/L
	Nickel	0	mg/L
	Selenium	0.3 U	mg/L
	Iron	0	mg/L
	Silver	0.03 U	mg/L
	Zinc	0	mg/L
	Magnesium	0	mg/L
	Potassium	0	mg/L
	Sodium	0	mg/L

 Continued on Page 3

49730/93-FEB-12-10-01/TCLP-ICP Continued from Page 2

Storet#	Analyte	Value	Units
	Strontium	0	mg/L
	Thallium	0	mg/L
	Vanadium	0	mg/L

Comment NONE

Sample ID: 49731/93-FEB-12-10-02 Matrix: S-SOIL
Location: INTERNATIONAL PETROLEUM
Field ID: TANK FARM
Collected: 11-FEB-1993 13:40 By: J.SCHOENBACHER
Authorized: 18-MAR-1993 By: Tim Fitzpatrick
Type: Grab Sample
Lab Comments:

Field Comments:

Analysis ID: HG-H-TCLP
Mercury in TCLP extracts by Method 7470, modified
Prepared: 23-FEB-1993 15:02 By: Jennifer Miller
Analyzed: 24-FEB-1993 15:10 By: Jennifer Miller
Authorized: 25-FEB-1993 By: Jack Merritt

Storet#	Analyte	Value	Units
	Mercury	0.001 U	mg/L

Analysis ID: TCLP-ICP
ICP multielement analysis of TCLP extracts, Method 6010
Prepared: 19-FEB-1993 16:33 By: John Perry
Analyzed: 24-FEB-1993 14:05 By: Lei Wei
Authorized: 18-MAR-1993 By: Tim Fitzpatrick

Storet#	Analyte	Value	Units
	Antimony	0	mg/L
	Aluminum	0	mg/L
	Arsenic	0.2 U	mg/L
	Barium	0.57 A	mg/L
	Cadmium	0.03 U	mg/L
	Chromium	0.1 U	mg/L
	Beryllium	0	mg/L
	Cobalt	0	mg/L
	Copper	0	mg/L
	Calcium	0	mg/L

 Continued on Page 4

49731/93-FEB-12-10-02/TCLP-ICP Continued from Page 3

Storet#	Analyte	Value	Units
	Lead	0.15 U	mg/L
	Manganese	0	mg/L
	Nickel	0	mg/L
	Selenium	0.3 U	mg/L
	Iron	0	mg/L
	Silver	0.03 U	mg/L
	Zinc	0	mg/L
	Magnesium	0	mg/L
	Potassium	0	mg/L
	Sodium	0	mg/L
	Strontium	0	mg/L
	Thallium	0	mg/L
	Vanadium	0	mg/L

Comment NONE

********** END OF REPORT **********

RQ-93-Feb-08-39

STATE OF FLORIDA
DEPARTMENT OF ENVIRONMENTAL REGULATION

CHAIN OF CUSTODY RECORD

KmB 2-11-93

49730

OJECT NO.

PROJECT NAME: ~~INTERNATIONAL PETROLEUM~~ & CLARK ENVIRONMENTAL

PLERS (Signature)

(TION BER	DATE	TIME	COMP.	GRAB	STATION LOCATION	NO. OF CONTAINERS	TCLP-Metals	TCLP-VOC	HG-H-TCLP	TCLP-TCP	TCLP-BNA	TCLP-VOC	REMARKS
1	2-11-93	10:20		✓	Stabilization Area	2							Exxon Drum - From CLARK Field ID # 20642

Relinquished by:	Date / Time	Received by:	Relinquished by:	Date / Time	Received by:
[signature]	2-11-93 1446	[signature]			
Relinquished by:	Date / Time	Received by:	Relinquished by:	Date / Time	Remarks:
Relinquished by:	Date / Time	Received by:	Received for Laboratory by:		
			Lena Harris 2-11-93 11:20 a.m		

ATTACHMENT C

RQ-93 - Feb-08-39

FIGURE 7-

2 of 2

INTERNATIONAL ENVIRONMENTAL SERVICES, INC.

105 S. Alexander Street • Plant City, Florida 33566

CHAIN OF CUSTODY RECORD

49731

PROJ. NO. IFC-1 | PROJECT NAME & ADDRESS [illegible]

SAMPLERS: (Signature) Jeff Schenkelberg

STA. NO.	DATE	TIME	COMP.	GRAB	STATION LOCATION	NO. OF CONTAINERS	TCLP-Pest	TCLP-Herb	Hg-H-TCLP	TCLP-TCLP	TCLP-BNA	TCLP-VOC	REMARKS
2	2/11	1340		X	Tank Farm	2	✓	✓					SPLIT - FILTER - BOSH - WASTE TCLP - 8 RCRA MET VOC Field ID # 20643

FOR SPLIT WITH IPC (KMA) 2-11-93

RELINQUISHED BY: (Signature)	DATE / TIME	RECEIVED BY: (Signature)	RELINQUISHED BY: (Signature)	DATE / TIME	RECEIVED BY: (Signature)
[signature]	2/11/93 1:45	[signature]	[signature]	2-11-93 1446	[signature]
RELINQUISHED BY: (Signature)	DATE / TIME	RECEIVED BY: (Signature)	RELINQUISHED BY: (Signature)	DATE / TIME	RECEIVED BY: (Signature)
RELINQUISHED BY: (Signature)	DATE / TIME	RECEIVED FOR LABORATORY BY:			

FLORIDA DEPARTMENT OF ENVIRONMENTAL REGULATION
CENTRAL LABORATORY
2600 BLAIR STONE ROAD
TALLAHASSEE, FLORIDA 32399-2400

CHEMICAL ANALYSIS REPORT

Request ID: RQ-93-FEB-08-39
Job ID: 93-FEB-12-09 Project: OTHER
Job Name: International Petroleum Corp. - Job created on
Date Received: 12-FEB-1993 Customer ID: SW-TAM-WSM
Authorized: 23-MAR-1993 By: Liang T. Lin

Submitted By: SW DIST. OFFICE (TAMPA) - WASTE MANAGEMEN
3804 Coconut Palm Drive
Tampa, Florida 33619

For Additional Information, Please Contact
G. William Coppenger, Ph.D.
Yuh-Hsu Pan, Ph.D.
Timothy W. Fitzpatrick
Liang-Tsair Lin, Ph.D.
Suncom 277-2571
(904) 487-2571

Certified By: YHan Date: 3-24-93

Abbreviations & Storet Codes:

A - Value reported is the mean of two or more determinations
J - Estimated value
K - Actual value is known to be less than value given
L - Actual value is known to be greater than value given
N - Presumptive evidence of presence of material.
O - Sampled, but analysis lost or not performed.
Q - Sample held beyond normal holding time.
T - Value reported is less than the practical quantitation limit
U - Material was analyzed for but not detected;
The value reported is the minimum detection limit

Sample ID: 49728/93-FEB-12-09-01 Matrix: S-SOIL
Location: CLARK ENVIRONMENTAL
Field ID: STABILIZATION AREA
Collected: 11-FEB-1993 10:20 By: J.SCHOENBACHER
Authorized: 19-MAR-1993 By: Mei-Fang Shyu
Type: Grab Sample
Lab Comments:

Field Comments:

Analysis ID: TCLP-VOC
Volatiles in TCLP ZHE extract by 5030-8240
Prepared: 17-FEB-1993 00:00 By: Foster Parks Kirby
Analyzed: 19-FEB-1993 00:00 By: Jusheng Qi
Authorized: 19-MAR-1993 By: Mei-Fang Shyu

Storet#	Analyte	Value	Units
	Benzene	260 A	ug/l
	Bromoform	5.0 U	ug/l
	Carbon tetrachloride	5.0 U	ug/l
	Chlorobenzene	5.0 U	ug/l
	Chloroform	5.0 U	ug/l
	1,2-Dichlorobenzene	9.6 T	ug/l
	1,3-Dichlorobenzene	5.0 U	ug/l
	1,4-Dichlorobenzene	5.0 U	ug/l
	Dibromochloromethane	5.0 U	ug/l
	1,1-Dichloroethane	5.0 U	ug/l
	1,2-Dichloroethane	19 A	ug/l
	1,1-Dichloroethene	7.7 T	ug/l
	1,2-Dichloropropane	5.0 U	ug/l
	Ethylbenzene	110 A	ug/l
	Methylene chloride	800 U	ug/l
	1,1,2,2-Tetrachloroethane	5.0 U	ug/l
	Tetrachloroethene	150 U	ug/l
	1,1,1-Trichloroethane	15 A	ug/l
	1,1,2-Trichloroethane	5.0 U	ug/l
	Trichloroethene	6.3 T	ug/l
	Toluene	950 A	ug/l
	Vinyl chloride	5.0 U	ug/l
	Xylenes	710 A	ug/l

Comments(1): The TCLP extract is obtained from bottle extraction.
(2):
(3):
(4):

Sample ID: 49729/93-FEB-12-09-02 Matrix: S-SOIL
Location: INTERNATIONAL PETROLEUM
Field ID: TANK FARM
Collected: 11-FEB-1993 13:40 By: J.SCHOENBACHER
Authorized: 19-MAR-1993 By: Mei-Fang Shyu
Type: Grab Sample
Lab Comments:

Field Comments:

Analysis ID: TCLP-VOC
Volatiles in TCLP ZHE extract by 5030-8240
Prepared: 17-FEB-1993 00:00 By: Foster Parks Kirby
Analyzed: 19-FEB-1993 00:00 By: Jusheng Qi
Authorized: 19-MAR-1993 By: Mei-Fang Shyu

Storet#	Analyte	Value	Units
	Benzene	47 A	ug/l
	Bromoform	5.0 U	ug/l
	Carbon tetrachloride	5.0 U	ug/l
	Chlorobenzene	5.0 U	ug/l
	Chloroform	5.0 U	ug/l
	1,2-Dichlorobenzene	5.0 U	ug/l
	1,3-Dichlorobenzene	5.0 U	ug/l
	1,4-Dichlorobenzene	5.0 U	ug/l
	Dibromochloromethane	5.0 U	ug/l
	1,1-Dichloroethane	5.0 U	ug/l
	1,2-Dichloroethane	5.0 U	ug/l
	1,1-Dichloroethene	11 A	ug/l
	1,2-Dichloropropane	5.0 U	ug/l
	Ethylbenzene	40 A	ug/l
	Methylene chloride	4300 A	ug/l
	1,1,2,2-Tetrachloroethane	5.0 U	ug/l
	Tetrachloroethene	150 U	ug/l
	1,1,1-Trichloroethane	38 A	ug/l
	1,1,2-Trichloroethane	5.0 U	ug/l
	Trichloroethene	5.0 U	ug/l
	Toluene	340 A	ug/l
	Vinyl chloride	5.0 U	ug/l
	Xylenes	250 A	ug/l

Comments(1): The TCLP extract is obtained from bottle extraction.
(2):
(3):
(4):

********** END OF REPORT **********

RQ-93-Feb-08-39

STATE OF FLORIDA
DEPARTMENT OF ENVIRONMENTAL REGULATION

CHAIN OF CUSTODY RECORD

KmB 2-11-93

49728

Page 1 of 2

PROJECT NO.

PROJECT NAME: ~~INTERNATIONAL PETROLEUM~~ & CLARK ENVIRONMENTAL

SAMPLERS (Signature)

STATION NUMBER	DATE	TIME	COMP.	GRAB	STATION LOCATION	NO. OF CONTAINERS	TCLP-Metals	TCLP-VOC	Hg-II-TCLP	TCLP-ICP	TCLP-BNA	TCLP-VOC	REMARKS
1	2-11-93	10:20		✓	Stabilization Area	2							Exxon Drum - From CLARK Field ID # 20642

Relinquished by:	Date / Time	Received by:
Leon Sull	2-11-93 1446	K Edwards
Relinquished by:	Date / Time	Received by:
Relinquished by:	Date / Time	Received for Laboratory by: Lena Harris 2-11-93 11:20 a.m.

Remarks:

FORM 9

ATTACHMENT C

RQ-93-Feb-08-39

FIGURE 7-

2 of 2

INTERNATIONAL ENVIRONMENTAL SERVICES, INC.

105 S. Alexander Street • Plant City, Florida 33566

CHAIN OF CUSTODY RECORD 49729

PROJ. NO.	PROJECT NAME & ADDRESS	NO. OF CONTAINERS							REMARKS
[illegible]	[illegible]								

SAMPLERS: (Signature) Jeff Schimelbach [illegible]

STA. NO.	DATE	TIME	COMP.	GRAB	STATION LOCATION	NO. OF CONTAINERS	[illegible]	[illegible]	HG-H-TCLP	TCLP-ICP	TCLP-BNA	TCLP-VOC	REMARKS
2	2/11/[illegible]	1340		X	Tank Farm	2	✓	✓					SPLIT - FILTER BASKET WASTE TCLP - 8 RCRA METALS VOC Field ID # 20643

2-11-93

FOR SPLIT WITH IPC (KMB)

RELINQUISHED BY: (Signature)	DATE / TIME		RECEIVED BY: (Signature)	RELINQUISHED BY: (Signature)	DATE / TIME		RECEIVED BY: (Signature)
[signature]	2/11/93	1:45	[signature]	[signature]	2-11-93	1446	[signature]
RELINQUISHED BY: (Signature)	DATE / TIME		RECEIVED BY: (Signature)	RELINQUISHED BY: (Signature)	DATE / TIME		RECEIVED BY: (Signature)

FLORIDA DEPARTMENT OF ENVIRONMENTAL REGULATION
CENTRAL LABORATORY
2600 BLAIR STONE ROAD
TALLAHASSEE, FLORIDA 32399-2400

CHEMICAL ANALYSIS REPORT

Request ID: RQ-93-FEB-08-39
Job ID: 93-FEB-12-08 Project: OTHER
Job Name: International Petroleum Corp. - Job created on
Date Received: 12-FEB-1993 Customer ID: SW-TAM-WSM
Authorized: 17-MAR-1993 By: Liang T. Lin

Submitted By: SW DIST. OFFICE (TAMPA) - WASTE MANAGEMEN
3804 Coconut Palm Drive
Tampa, Florida 33619

For Additional Information, Please Contact
G. William Coppenger, Ph.D.
Yuh-Hsu Pan, Ph.D.
Timothy W. Fitzpatrick
Liang-Tsair Lin, Ph.D.
Suncom 277-2571
(904) 487-2571

Certified By: Han Date: 3-22-93

Abbreviations & Storet Codes:

A - Value reported is the mean of two or more determinations
J - Estimated value
K - Actual value is known to be less than value given
L - Actual value is known to be greater than value given
N - Presumptive evidence of presence of material.
O - Sampled, but analysis lost or not performed.
Q - Sample held beyond normal holding time.
T - Value reported is less than the practical quantitation limit
U - Material was analyzed for but not detected;
The value reported is the minimum detection limit

Sample ID: 49726/93-FEB-12-08-01 Matrix: S-SOIL
Location: CLARK ENVIRONMENTAL
Field ID: STABILIZATION AREA
Collected: 11-FEB-1993 10:20 By: J.SCHOENBACHER
Authorized: 15-MAR-1993 By: Mei-Fang Shyu
Type: Grab Sample
Lab Comments:

Field Comments:

Analysis ID: TCLP-SMVOL
TCLP extraction of semi-volatiles with analysis by GC/MS
Prepared: 17-FEB-1993 11:00 By: Kevin Everett
Analyzed: 4-MAR-1993 03:15 By: Joseph W. Moore
Authorized: 9-MAR-1993 By: Joseph W. Moore

Storet#	Analyte	Value	Units
	o-Cresol	110	ug/L
	m,p-Cresols	170	ug/L
	1,4-Dichlorobenzene	1.5 U	ug/L
	2,4-Dinitrotoluene	1.5 U	ug/L
	Endrin	6.0 U	ug/L
	Hexachlorobenzene	0.80 U	ug/L
	Hexachlorobutadiene	3.0 U	ug/L
	Hexachloroethane	3.0 U	ug/L
	gamma-BHC	1.5 U	ug/L
	Nitrobenzene	0.80 U	ug/L
	Pentachlorophenol	6.0 U	ug/L
	2,4,5-Trichlorophenol	0.80 U	ug/L
	2,4,6-Trichlorophenol	0.80 U	ug/L

Comments: Other compounds detected:
(2): Phenol: 210 ug/l; 2,4-dimethylphenol: 84 ug/l;
(3): Naphthalene: 95 ug/l; Flourene: 6.7 ug/l;
(4): Acenaphthene: 2.8 ug/l T; Phenanthrene: 2.6 ug/l T.
(5): Sample was an oily waste. Total extractable
(6): petroleum hydrocarbons: est. 4.4E+06 ug/l in TCLP extract.
(7):
(8):
(9):
(10):
(11):
(12):
(13):
(14):
(15):
(16):
(17):
(18):
(19):
(20):

 Continued on Page 3

49726/93-FEB-12-08-01/TCLP-SMVOL Continued from Page 2

Storet#	Analyte	Value	Units

(21):
(22):
(23):
(24):
(25):

Sample ID: 49727/93-FEB-12-08-02 Matrix: S-SOIL
Location: INTERNATIONAL PETROLEUM
Field ID: TANK FARM
Collected: 11-FEB-1993 13:40 By: J.SCHOENBACHER
Authorized: 15-MAR-1993 By: Mei-Fang Shyu
Type: Grab Sample
Lab Comments:

Field Comments:

Analysis ID: TCLP-SMVOL
TCLP extraction of semi-volatiles with analysis by GC/MS
Prepared: 17-FEB-1993 11:00 By: Kevin Everett
Analyzed: 4-MAR-1993 04:15 By: Joseph W. Moore
Authorized: 9-MAR-1993 By: Joseph W. Moore

Storet#	Analyte	Value	Units
	o-Cresol	160	ug/L
	m,p-Cresols	87	ug/L
	1,4-Dichlorobenzene	1.5 U	ug/L
	2,4-Dinitrotoluene	1.5 U	ug/L
	Endrin	6.0 U	ug/L
	Hexachlorobenzene	0.80 U	ug/L
	Hexachlorobutadiene	3.0 U	ug/L
	Hexachloroethane	3.0 U	ug/L
	gamma-BHC	1.5 U	ug/L
	Nitrobenzene	0.80 U	ug/L
	Pentachlorophenol	6.0 U	ug/L
	2,4,5-Trichlorophenol	0.80 U	ug/L
	2,4,6-Trichlorophenol	0.80 U	ug/L

Comments: Other compounds detected:
(2): Phenol: 85 ug/l; 2,4-dimethyl phenol: 90 ug/l;
(3): Naphthalene: 77 ug/l; Flourene: 5.8 ug/l;
(4): Acenaphthene: 2.7 ug/l T.
(5): Sample was an oily waste. Total extractable petroleum
(6): hydrocarbons: est. 6.8E+06 ug/l in TCLP extract.
(7):
(8):
(9):

49727/93-FEB-12-08-02/TCLP-SMVOL Continued on Page 4

49727/93-FEB-12-08-02/TCLP-SMVOL Continued from Page 3

Storet#	Analyte	Value	Units
(10):			
(11):			
(12):			
(13):			
(14):			
(15):			
(16):			
(17):			
(18):			
(19):			
(20):			
(21):			
(22):			
(23):			
(24):			
(25):			

********** END OF REPORT **********

RQ-93-Feb-08-39

STATE OF FLORIDA
DEPARTMENT OF ENVIRONMENTAL REGULATION

CHAIN OF CUSTODY RECORD 49726

Page 1 of 2

KmB 2-11-93

PROJECT NO.

PROJECT NAME: ~~INTERNATIONAL PETROLEUM~~ CLARK ENVIRONMENTAL

SAMPLERS (Signature) Jeff Schrenkeisen

STATION NUMBER	DATE	TIME	COMP.	GRAB	STATION LOCATION	NO. OF CONTAINERS	TCLP-Metals KE	TCLP-VOC KE	HG-H-TCLP	TCLP-TCP	TCLP-BNA	TCLP-VOC	REMARKS
1	2-11-93	10:20		✓	Stabilization Area 2						49726		Exxon Drum - From CLARK Field ID # 20642

Relinquished by:	Date / Time	Received by:	Relinquished by:	Date / Time	Received by:
Kevin Sull	2-11-93 1446	K Edwards			
Relinquished by:	Date / Time	Received by:	Relinquished by:	Date / Time	Remarks:
Relinquished by:	Date / Time	Received by:	Received for Laboratory by: Lena Harris 2-11-93 11:20 a.m		

ATTACHMENT C

ER FORM 9

RQ-93-Feb-08-39

FIGURE 7-

2 of 2

INTERNATIONAL ENVIRONMENTAL SERVICES, INC.

105 S. Alexander Street • Plant City, Florida 33566

CHAIN OF CUSTODY RECORD

49727

PROJ. NO.: IPC-1

PROJECT NAME & ADDRESS: 105 S. Alexander St. International Petroleum, Plant City

SAMPLERS: (Signature) Jeff Schaembacher FDER

STA. NO.	DATE	TIME	COMP.	GRAB	STATION LOCATION	NO. OF CONTAINERS	TCLP	TCLP VOC	HG-H-TCLP	TCLP-ICP	TCLP-BNA	TCLP-VOC	REMARKS
2	2/11	1340		X	Tank Farm	2	✓	✓					SPLIT – FILTER Basket Waste TCLP – 8 RCRA Metals VOC Field ID # 20643

FOR SPLIT WITH IPC (KMB) 2-11-93

RELINQUISHED BY: (Signature)	DATE / TIME	RECEIVED BY: (Signature)	RELINQUISHED BY: (Signature)	DATE / TIME	RECEIVED BY: (Signature)
Jeff Schaembacher	2/11/93 1:45	Anthony Malatesta	Kevin Bell	2-11-93 1446	K Edwards
RELINQUISHED BY: (Signature)	DATE / TIME	RECEIVED BY: (Signature)	RELINQUISHED BY: (Signature)	DATE / TIME	RECEIVED BY: (Signature)
RELINQUISHED BY: (Signature)	DATE / TIME	RECEIVED FOR LABORATORY BY: (Signature) L Harris	DATE / TIME 2-11-93 11:20 a.m.	REMARKS	

FIGURE 7-1

755 PRAIRIE INDUSTRIAL PARKWAY
MULBERRY, FL 33860

PROFILE DOCUMENT 142-B01

GENERATOR: International Petroleum Corp
GENERATOR #: 142-D01
SITE ADDRESS: 105 S. Alexander Street
BROKER:
MAILING ADDRESS:
CONTACT: Allen
CITY: Plant City STATE: Fla ZIP: 33566
TELEPHONE: 813-754-1504
TELEPHONE: EPA ID #:
ADDRESS:
TYPE OF BUSINESS: Oil Recycler
PROCESS DESCRIPTION: Filter Cleaning & Sales
PROPER D.O.T. SHIPPING NAME: Industrial Waste Non-Regulated

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

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 DICHLOROETHYLENE	<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 Sudduth DATE 8-19-91

PHOSLAB

806 W. Beacon Road • Lakeland, Florida 33803

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

Attn: Mr. Jim Clark
P.O. #
Project: 136-SO1/142-SO1
Reference:

Sampled By: JC
Sample Date: 1-31-92
Date Received: 1-31-92
Analysis Date: 2-4-92
Analyzed By: GJF/JMC

CERTIFICATE OF ANALYSIS

TOXICITY CHARACTERISTIC LEACHING PROCEDURE SAMPLE ID: 142-SO1
EPA METHOD 1311

	Conc., mg/L
Tetrachloroethylene	0.030

QA OFFICER

CHEMIST

FDER QA/QC #873000

INTERNATIONAL ENVIRONMENTAL SERVICES, INC.
IES
105 South Alexander St. • Plant City, Florida 33566 • (813) 754-2373
Tampa (813) 229-0879 • Miami Office 1-800-537-9875 • 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 #: 80691-007-IPC
Source: IPC-FL 13 Drum Composite (OIL)
Description: 1,2,3,5,13,14,15,16,17,21,22,25,26
Client's ID: Oil Composite

METALS:	RESULTS mg/kg
Cadmium	0.8
Chromium	8.0
Lead	200
TCLP Lead	<.5 mg/l
TOX	223 mg/kg

Results expressed in ☐ mg/l (ppm) ☐ ug/l
☒ 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

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.
Ethylbenzene	16.
p,m-xylene	58.4
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 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.

INTERNATIONAL ENVIRONMENTAL SERVICES, INC.
105 South Alexander St. • Plant City, Florida 33566 • (813) 754-2373
Tampa (813) 229-0879 • Miami Office 1-800 5[illegible]7-9875 • 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: 08/02/91
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: 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/or 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

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/or 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 1-800-537-9876 • 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 FOR KILN
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/or 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.

INTERNATIONAL ENVIRONMENTAL SERVICES, INC.

IES

105 South Alexander St. • Plant City, Florida 33566 • (813) 754-2373
Tampa (813) 229-0879 • Miami Office 1-800-537-9875 • 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	10.3	mg/l
Oil & Grease	25.3	mg/l

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/or 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.

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: 08/02/91
DATE COMPLETED: 08/16/91

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

METALS:	RESULTS mg/kg	ACCEPTABLE CRITERIA FOR [illegible]
Arsenic	<30	55
Barium	152.6	2750
Cadmium	1.5	55
Chromium	17.5	275
Lead	71.0	7[illegible]
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/or 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.

3/23/93

FLORIDA DEPARTMENT OF ENVIRONMENTAL REGULATION
CENTRAL LABORATORY
2600 BLAIR STONE ROAD
TALLAHASSEE, FLORIDA 32399-2400

CHEMICAL ANALYSIS REPORT

Request ID: RQ-93-FEB-08-39
Job ID: 93-FEB-12-08 Project: OTHER
Job Name: International Petroleum Corp. - Job created on
Date Received: 12-FEB-1993 Customer ID: SW-TAM-WSM
Authorized: 17-MAR-1993 By: Liang T. Lin

Submitted By: SW DIST. OFFICE (TAMPA) - WASTE MANAGEMEN
3804 Coconut Palm Drive
Tampa, Florida 33619

For Additional Information, Please Contact
G. William Coppenger, Ph.D.
Yuh-Hsu Pan, Ph.D.
Timothy W. Fitzpatrick
Liang-Tsair Lin, Ph.D.
Suncom 277-2571
(904) 487-2571

Preliminary Review Copy Date: 19-MAR-1993

Abbreviations & Storet Codes:

A - Value reported is the mean of two or more determinations
J - Estimated value
K - Actual value is known to be less than value given
L - Actual value is known to be greater than value given
N - Presumptive evidence of presence of material.
O - Sampled, but analysis lost or not performed.
Q - Sample held beyond normal holding time.
T - Value reported is less than the practical quantitation limit
U - Material was analyzed for but not detected;
The value reported is the minimum detection limit

Sample ID: 49726/93-FEB-12-08-01 Matrix: S-SOIL
Location: CLARK ENVIRONMENTAL
Field ID: STABILIZATION AREA
Collected: 11-FEB-1993 10:20 By: J.SCHOENBACHER
Authorized: 15-MAR-1993 By: Mei-Fang Shyu
Type: Grab Sample
Lab Comments:

Field Comments:

Analysis ID: TCLP-SMVOL
TCLP extraction of semi-volatiles with analysis by GC/MS
Prepared: 17-FEB-1993 11:00 By: Kevin Everett
Analyzed: 4-MAR-1993 03:15 By: Joseph W. Moore
Authorized: 9-MAR-1993 By: Joseph W. Moore

Storet#	Analyte	Value	Units
	o-Cresol	110	ug/L
	m,p-Cresols	170	ug/L
	1,4-Dichlorobenzene	1.5 U	ug/L
	2,4-Dinitrotoluene	1.5 U	ug/L
	Endrin	6.0 U	ug/L
	Hexachlorobenzene	0.80 U	ug/L
	Hexachlorobutadiene	3.0 U	ug/L
	Hexachloroethane	3.0 U	ug/L
	gamma-BHC	1.5 U	ug/L
	Nitrobenzene	0.80 U	ug/L
	Pentachlorophenol	6.0 U	ug/L
	2,4,5-Trichlorophenol	0.80 U	ug/L
	2,4,6-Trichlorophenol	0.80 U	ug/L

Comments: Other compounds detected:
(2): Phenol: 210 ug/l; 2,4-dimethylphenol: 84 ug/l;
(3): Naphthalene: 95 ug/l; Flourene: 6.7 ug/l;
(4): Acenaphthene: 2.8 ug/l T; Phenanthrene: 2.6 ug/l T.
(5): Sample was an oily waste. Total extractable
(6): petroleum hydrocarbons: est. 4.4E+06 ug/l in TCLP extract.
(7):
(8):
(9):
(10):
(11):
(12):
(13):
(14):
(15):
(16):
(17):
(18):
(19):
(20):

Continued on Page 3

49726/93-FEB-12-08-01/TCLP-SMVOL Continued from Page 2

Storet#	Analyte	Value	Units
(21):			
(22):			
(23):			
(24):			
(25):			

Sample ID: 49727/93-FEB-12-08-02 Matrix: S-SOIL
Location: INTERNATIONAL PETROLEUM
Field ID: TANK FARM
Collected: 11-FEB-1993 13:40 By: J.SCHOENBACHER
Authorized: 15-MAR-1993 By: Mei-Fang Shyu
Type: Grab Sample
Lab Comments:

Field Comments:

Analysis ID: TCLP-SMVOL
TCLP extraction of semi-volatiles with analysis by GC/MS
Prepared: 17-FEB-1993 11:00 By: Kevin Everett
Analyzed: 4-MAR-1993 04:15 By: Joseph W. Moore
Authorized: 9-MAR-1993 By: Joseph W. Moore

Storet#	Analyte	Value	Units
	o-Cresol	160	ug/L
	m,p-Cresols	87	ug/L
	1,4-Dichlorobenzene	1.5 U	ug/L
	2,4-Dinitrotoluene	1.5 U	ug/L
	Endrin	6.0 U	ug/L
	Hexachlorobenzene	0.80 U	ug/L
	Hexachlorobutadiene	3.0 U	ug/L
	Hexachloroethane	3.0 U	ug/L
	gamma-BHC	1.5 U	ug/L
	Nitrobenzene	0.80 U	ug/L
	Pentachlorophenol	6.0 U	ug/L
	2,4,5-Trichlorophenol	0.80 U	ug/L
	2,4,6-Trichlorophenol	0.80 U	ug/L

Comments: Other compounds detected:
(2): Phenol: 85 ug/l; 2,4-dimethyl phenol: 90 ug/l;
(3): Naphthalene: 77 ug/l; Flourene: 5.8 ug/l;
(4): Acenaphthene: 2.7 ug/l T.
(5): Sample was an oily waste. Total extractable petroleum
(6): hydrocarbons: est. 6.8E+06 ug/l in TCLP extract.
(7):
(8):
(9):

Continued on Page 4

49727/93-FEB-12-08-02/TCLP-SMVOL Continued from Page 3

Storet#	Analyte	Value	Units
(10):			
(11):			
(12):			
(13):			
(14):			
(15):			
(16):			
(17):			
(18):			
(19):			
(20):			
(21):			
(22):			
(23):			
(24):			
(25):			

********** END OF REPORT **********

FLORIDA DEPARTMENT OF ENVIRONMENTAL REGULATION
CENTRAL LABORATORY
2600 BLAIR STONE ROAD
TALLAHASSEE, FLORIDA 32399-2400

CHEMICAL ANALYSIS REPORT

Request ID: RQ-93-FEB-08-39
Job ID: 93-FEB-12-10 Project: OTHER
Job Name: International Petroleum Corp. - Job created on
Date Received: 12-FEB-1993 Customer ID: SW-TAM-WSM
Authorized: 18-MAR-1993 By: Tim Fitzpatrick

Submitted By: SW DIST. OFFICE (TAMPA) - WASTE MANAGEMEN
3804 Coconut Palm Drive
Tampa, Florida 33619

For Additional Information, Please Contact
G. William Coppenger, Ph.D.
Yuh-Hsu Pan, Ph.D.
Timothy W. Fitzpatrick
Liang-Tsair Lin, Ph.D.
Suncom 277-2571
(904) 487-2571

Preliminary Review Copy Date: 19-MAR-1993

Abbreviations & Storet Codes:

A - Value reported is the mean of two or more determinations
J - Estimated value
K - Actual value is known to be less than value given
L - Actual value is known to be greater than value given
N - Presumptive evidence of presence of material.
O - Sampled, but analysis lost or not performed.
Q - Sample held beyond normal holding time.
T - Value reported is less than the practical quantitation limit
U - Material was analyzed for but not detected;
The value reported is the minimum detection limit

Sample ID: 49730/93-FEB-12-10-01 Matrix: S-SOIL
Location: CLARK ENVIRONMENTAL
Field ID: STABILIZATION AREA
Collected: 11-FEB-1993 10:20 By: J.SCHOENBACHER
Authorized: 18-MAR-1993 By: Tim Fitzpatrick
Type: Grab Sample
Lab Comments:

Field Comments:

Analysis ID: HG-H-TCLP
Mercury in TCLP extracts by Method 7470, modified
Prepared: 23-FEB-1993 15:02 By: Jennifer Miller
Analyzed: 24-FEB-1993 15:10 By: Jennifer Miller
Authorized: 25-FEB-1993 By: Jack Merritt

Storet#	Analyte	Value	Units
	Mercury	0.001 U	mg/L

Analysis ID: TCLP-ICP
ICP multielement analysis of TCLP extracts, Method 6010
Prepared: 19-FEB-1993 16:33 By: John Perry
Analyzed: 24-FEB-1993 13:58 By: Lei Wei
Authorized: 18-MAR-1993 By: Tim Fitzpatrick

Storet#	Analyte	Value	Units
	Antimony	0	mg/L
	Aluminum	0	mg/L
	Arsenic	0.2 U	mg/L
	Barium	0.64	mg/L
	Cadmium	0.03 U	mg/L
	Chromium	0.1 U	mg/L
	Beryllium	0	mg/L
	Cobalt	0	mg/L
	Copper	0	mg/L
	Calcium	0	mg/L
	Lead	0.15 U	mg/L
	Manganese	0	mg/L
	Nickel	0	mg/L
	Selenium	0.3 U	mg/L
	Iron	0	mg/L
	Silver	0.03 U	mg/L
	Zinc	0	mg/L
	Magnesium	0	mg/L
	Potassium	0	mg/L
	Sodium	0	mg/L

Continued on Page 3

49730/93-FEB-12-10-01/TCLP-ICP Continued from Page 2

Storet#	Analyte	Value	Units
	Strontium	0	mg/L
	Thallium	0	mg/L
	Vanadium	0	mg/L
Comment	NONE		

Sample ID: 49731/93-FEB-12-10-02 Matrix: S-SOIL
Location: INTERNATIONAL PETROLEUM
Field ID: TANK FARM
Collected: 11-FEB-1993 13:40 By: J.SCHOENBACHER
Authorized: 18-MAR-1993 By: Tim Fitzpatrick
Type: Grab Sample
Lab Comments:

Field Comments:

Analysis ID: HG-H-TCLP
Mercury in TCLP extracts by Method 7470, modified
Prepared: 23-FEB-1993 15:02 By: Jennifer Miller
Analyzed: 24-FEB-1993 15:10 By: Jennifer Miller
Authorized: 25-FEB-1993 By: Jack Merritt

Storet#	Analyte	Value	Units
	Mercury	0.001 U	mg/L

Analysis ID: TCLP-ICP
ICP multielement analysis of TCLP extracts, Method 6010
Prepared: 19-FEB-1993 16:33 By: John Perry
Analyzed: 24-FEB-1993 14:05 By: Lei Wei
Authorized: 18-MAR-1993 By: Tim Fitzpatrick

Storet#	Analyte	Value	Units
	Antimony	0	mg/L
	Aluminum	0	mg/L
	Arsenic	0.2 U	mg/L
	Barium	0.57 A	mg/L
	Cadmium	0.03 U	mg/L
	Chromium	0.1 U	mg/L
	Beryllium	0	mg/L
	Cobalt	0	mg/L
	Copper	0	mg/L
	Calcium	0	mg/L

Continued on Page 4

49731/93-FEB-12-10-02/TCLP-ICP Continued from Page 3

Storet#	Analyte	Value	Units
	Lead	0.15 U	mg/L
	Manganese	0	mg/L
	Nickel	0	mg/L
	Selenium	0.3 U	mg/L
	Iron	0	mg/L
	Silver	0.03 U	mg/L
	Zinc	0	mg/L
	Magnesium	0	mg/L
	Potassium	0	mg/L
	Sodium	0	mg/L
	Strontium	0	mg/L
	Thallium	0	mg/L
	Vanadium	0	mg/L

Comment NONE

********** END OF REPORT **********

93 - Feb-08-39

FIGURE 7-

2 of 2

INTERNATIONAL ENVIRONMENTAL SERVICES, INC.

105 S. Alexander Street • Plant City, Florida 33566

CHAIN OF CUSTODY RECORD

PROJ. NO.: IPC-1

PROJECT NAME & ADDRESS: 105 S. Alexander St. International Petroleum

SAMPLERS: (Signature) FOR: Jeff Schoenbachler

STA. NO.	DATE	TIME	COMP.	GRAB	STATION LOCATION	NO. OF CONTAINERS	TCLP Metals	TCLP VOC					REMARKS
2	2/11/93	1340		X	Tank Farm	2	✓	✓					SPLIT - FILTER BASKET WASTE TCLP - 8 RCRA METALS VOC
					FOR SPLIT WITH IPC	2-11-93							

RELINQUISHED BY: (Signature)	DATE / TIME	RECEIVED BY: (Signature)	RELINQUISHED BY: (Signature)	DATE / TIME	RECEIVED BY: (Signature)
	2/11/93 1:45			2-11-93 1446	
RELINQUISHED BY: (Signature)	DATE / TIME	RECEIVED BY: (Signature)	RELINQUISHED BY: (Signature)	DATE / TIME	RECEIVED BY: (Signature)
RELINQUISHED BY: (Signature)	DATE / TIME	RECEIVED FOR LABORATORY BY: (Signature)	DATE / TIME	REMARKS	

FIGURE 7-1

This Request Has Been Approved

Summary For Request ID: RQ-93-FEB-08-39

Reqested By: JEFF SCHOENBACHER/PA Date of Request: 10-FEB-1993
Customer...: SW-TAM-WSM Project.....: OTHER
Division...: WSM District.....: SW
Project Name: International Petroleum Corp.

Comments: International Petroleum Corp.

Phone : 813-744-6100 Suncom 552-7612
3804 Coconut Palm Drive
Tampa, Florida 33619

Program Module Number: 3063 Criminal Ivestigation: YES
Priority.....: 3 Custody.....: YES
Request Status.....: A Base Project....: YES
Request Reviewed By..: YUHHSU Date Reviewed...: 10-FEB-1993
Sampling Kit Required: NO Date to Ship Kit:
Sampling Kit Shipped.: NO Kit Shipped.....:
Kit Packed By.....: Receive Samples.: 8-FEB-1993

Group# 1 - METALS 2 Samples Composite Total: 16.0

Simp WT	Comp WT	Analysis ID	Analysis Description
4.0	4.0	HG-H-TCLP	- Mercury in TCLP extracts by Method 7470, modifi
4.0	4.0	TCLP-ICP	- ICP multielement analysis of TCLP extracts, Met

Group# 1 - SM-VOLATIL 2 Samples Composite Total: 12.0

Simp WT	Comp WT	Analysis ID	Analysis Description
6.0	6.0	TCLP-BNA	- TCLP extraction of semi-volatiles prior to 625

Group# 1 - VOLATILE 2 Samples Composite Total: 14.0

Simp WT	Comp WT	Analysis ID	Analysis Description
7.0	7.0	TCLP-VOC	- Volatiles in TCLP ZHE extract by 5030-8240

Group Summary:

METALS	2	Samples
SM-VOLATIL	2	Samples
VOLATILE	2	Samples

Additonal Comments:

Comments: Response Operation

0270

NON-HAZARDOUS WASTE MANIFEST

1. Generator's US EPA ID No. NA | Manifest Document No. NA | 2. Page 1 of 1

GENERATOR

3. Generator's Name and Mailing Address: International Petro Corp, 905 S. Alexander St, Plant City Fla

4. Generator's Phone (813) 754 1504

5. Transporter 1 Company Name: Inland Waters | 6. US EPA ID Number: NA

7. Transporter 2 Company Name | 8. US EPA ID Number

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

A. Transporter's Phone

B. Transporter's Phone

C. Facility's Phone: 813-425-4884

11. Waste Shipping Name and Description	12. Containers No.	12. Containers Type	13. Total Quantity	14. Unit Wt/Vol
a. Industrial Waste Non Hazardous	00.1	T.T	25.4.6.0	lbs
b.				
c.				
d.				

D. Additional Descriptions for Materials Listed Above: A) 142 - B01

E. Handling Codes for Wastes Listed Above

15. Special Handling Instructions and Additional Information

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: Philip K. Curtis | Signature: Philip K. Curtis | Month: 10 | Day: 07 | Year: 91

TRANSPORTER

17. Transporter 1 Acknowledgement of Receipt of Materials

Printed/Typed Name: Rebecca Kaminski | Signature: Rebecca Kaminski | Month: 10 | Day: 10 | Year: 91

18. Transporter 2 Acknowledgement of Receipt of Materials

Printed/Typed Name: RECEIVED JAN 29 1992 | Signature | Month | Day | Year

FACILITY

19. Discrepancy Indication Space: Ans'd.....

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: Jim Clark | Month: 10 | Day: 10 | Year: 91

ORIGINAL — RETURN TO GENERATOR

12 BLS-C6 Rev. 11/89

NON-HAZARDOUS WASTE MANIFEST

1. Generator's US EPA ID No.	Manifest Document No.	2. Page 1 of 1
. . . NA	NA	

GENERATOR

3. Generator's Name and Mailing Address: International Petroleum Corp
105 S. Alexander St.
Plant City, Fla

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

5. Transporter 1 Company Name	6. US EPA ID Number
International Petroleum Corp	. . . NA . . . .

7. Transporter 2 Company Name	8. US EPA ID Number
	. . . . .

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

A. Transporter's Phone: 813-754-1504
B. Transporter's Phone:
C. Facility's Phone: 813-425-1854

11. Waste Shipping Name and Description	12. Containers No.	12. Containers Type	13. Total Quantity	14. Unit Wt/Vol
a. Industrial Waste Non-Regulated	0.0.1	DM	0.0.0.5.5	G
b.				
c.				
d.				

D. Additional Descriptions for Materials Listed Above
A) 1412 - D02

E. Handling Codes for Wastes Listed Above

15. Special Handling Instructions and Additional Information

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
JOSEPH CLARK	Joseph Clark	1	21	92

TRANSPORTER

17. Transporter 1 Acknowledgement of Receipt of Materials

Printed/Typed Name	Signature	Month	Day	Year
JOSEPH CLARK	Joseph Clark	1	21	92

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		01	31	92

GENERATOR'S COPY

12 BLS G6 Rev. 11/89

00863

NON-HAZARDOUS WASTE MANIFEST

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

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

5. Transporter 1 Company Name | 6. US EPA ID Number

7. Transporter 2 Company Name | 8. US EPA ID Number

9. Designated Facility Name and Site Address | 10. US EPA ID Number
CLARK ENVIRONMENTAL, INC.
755 PRAIRIE INDUSTRIAL PARKWAY
MULBERRY, FLORIDA 33860

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 CRUSH & DRAINED SOCK OIL FILTERS	2	DM	00.1.10	G
b.				
c.				
d.				

D. Additional Descriptions for Materials Listed Above
i) 142 - D04 (Light Debris

E. Handling Codes for Wastes Listed Above

15. Special Handling Instructions and Additional Information

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: INTERNATIONAL PETROLEUM CORPORATION | Signature | Month 10 | Day 27 | Year 92

17. Transporter 1 Acknowledgement of Receipt of Materials

Printed/Typed Name: INTERNATIONAL PETROLEUM CORPORATION | Signature | Month 10 | Day 27 | Year 92

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 10 | Day 27 | Year 92

GENERATOR — TRANSPORTER — FACILITY

ORIGINAL — RETURN TO GENERATOR

BLS-25 (Rev. 11/89)

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

NON-HAZARDOUS WASTE MANIFEST

1. Generator's US EPA ID No.	Manifest Document No.	2. Page 1 of
FLD 065680613		

GENERATOR

3. Generator's Name and Mailing Address
International Petroleum Corporation
105 S. Alexander St., Plant City, Florida 33566

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

5. Transporter 1 Company Name: IPC
6. US EPA ID Number:

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

9. Designated Facility Name and Site Address
Clark Environmental Inc.
755 Prairie Industrial Parkway
Mulberry, Florida 33860

10. US EPA ID Number:

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

11. Waste Shipping Name and Description	12. Containers No.	12. Containers Type	13. Total Quantity	14. Unit Wt/Vol
a. Waste Material, Non Hazardous — Drums	5		2.75	G
b. Crushed Oil Filters — Drums	3		1.65	G
c.				
d. a) 142-D01				

D. Additional Descriptions for Materials Listed Above
a) 0142 - D02 (Sludge)
b) 0142 - D04 (Light Debris/Filters)

E. Handling Codes for Wastes Listed Above:

15. Special Handling Instructions and Additional Information
Pick up 10 drums

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: JOSEPH A. CLARK JR. — Signature: [signature] — Month: 12 — Day: 10 — Year: 92

TRANSPORTER

17. Transporter 1 Acknowledgement of Receipt of Materials

Printed/Typed Name: JOSEPH A. CLARK JR. — Signature: [signature] — Month: 12 — Day: 10 — Year: 92

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: Elizabeth G. Clark — Signature: [signature] — Month: 12 — Day: 10 — Year: 92

TRANSPORTER #1

W363

Please print or type
(Form designed for use on elite (12-pitch) typewriter)

NON-HAZARDOUS WASTE MANIFEST

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

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

5. Transporter 1 Company Name | 6. US EPA ID Number

7. Transporter 2 Company Name | 8. US EPA ID Number

9. Designated Facility Name and Site Address
CLARK ENVIRONMENTAL, INC.
755 PRAIRIE INDUSTRIAL PARKWAY
MULBERRY, FLORIDA 33860
10. US EPA ID Number

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	2	DM	00.1.10	G
b.				
c.				
d.				

D. Additional Descriptions for Materials Listed Above
142-D02 (sludge)

E. Handling Codes for Wastes Listed Above

15. Special Handling Instructions and Additional Information

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: INTERNATIONAL PETROLEUM CORPORATION | Signature | Month 10 | Day 27 | Year 92

17. Transporter 1 Acknowledgement of Receipt of Materials
Printed/Typed Name: INTERNATIONAL PETROLEUM CORPORATION | Signature | Month 10 | Day 27 | Year 92

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: Tom Clark | Signature: Tom Clark | Month 10 | Day 27 | Year 92

GENERATOR
TRANSPORTER
FACILITY

ORIGINAL — RETURN TO GENERATOR

12-BES-05 Rev. 11/89

Please print or type (Form designed for use on elite (12-pitch) typewriter.)

NON-HAZARDOUS WASTE MANIFEST

1. Generator's US EPA ID No.	Manifest Document No.	2. Page 1 of
FLD 055520613		

3. Generator's Name and Mailing Address
International Petroleum Corporation
105 S. Alexander St., Plant City, Florida 33566

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

5. Transporter 1 Company Name	6. US EPA ID Number
IPC	

7. Transporter 2 Company Name	8. US EPA ID Number

9. Designated Facility Name and Site Address	10. US EPA ID Number
Clark Environmental Inc. 755 Prairie Industrial Parkway Mulberry, Florida 33860	

A. Transporter's Phone
B. Transporter's Phone
C. Facility's Phone (813) 425-4884

11. Waste Shipping Name and Description	12. Containers No.	Type	13. Total Quantity	14. Unit Wt/Vol
a. Waste Material, Non Hazardous Drums	5		2.15	G
b. Crushed Oil Filters Drums	3		1.95	G
c.				
d. a) 142-B01				

D. Additional Descriptions for Materials Listed Above
a) 0112-B02 (Sludge)
b) 0112-B01 (Crushed Oil Filters)

E. Handling Codes for Wastes Listed Above

15. Special Handling Instructions and Additional Information
Pick up 16 drums

GENERATOR

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
Joseph A. Carlan Jr.		12	19	92

TRANSPORTER

17. Transporter 1 Acknowledgement of Receipt of Materials

Printed/Typed Name	Signature	Month	Day	Year
Joseph A. Carlan Jr.		12	19	92

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
Charles C. Clark		12	10	92

GENERATOR'S COPY

12-BLS-C5 - Rev. 11/89

Please print or type
(Form designed for use on elite (12-pitch) typewriter.)

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 Corp.
105 S. Alexander St.
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

9. Designated Facility Name and Site Address
Clark Environmental, Inc.
755 N. Prairie Ind.Pkwy
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 (813) 425-4884

11. Waste Shipping Name and Description	12. Containers No.	Type	13. Total Quantity	14. Unit Wt/Vol
a. Industrial Waste Non-Regulated	00.6	DM	00330	G
b.				
c.				
d.				

D. Additional Descriptions for Materials Listed Above
AE A) 142-D01

E. Handling Codes for Wastes Listed Above

15. Special Handling Instructions and Additional Information

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: JOSEPH CLARK — Signature: Joseph Clark — Month 1 Day 31 Year 92

TRANSPORTER

17. Transporter 1 Acknowledgement of Receipt of Materials

Printed/Typed Name: JOSEPH CLARK — Signature: Joseph Clark — Month 1 Day 31 Year 92

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: Jim Clark — Month 01 Day 31 Year 92

TRANSPORTER #1

12-BES-CB Rev. 11-89

NON-HAZARDOUS WASTE MANIFEST

1. Generator's US EPA ID No.	Manifest Document No.	2. Page 1 of 1
. . . NA	. NA .	

GENERATOR

3. Generator's Name and Mailing Address: International Petroleum Corp
105 S. Alexander St
Plant City Fla

4. Generator's Phone (813)

5. Transporter 1 Company Name	6. US EPA ID Number
International Petro. Corp	. . . NA . . . .

7. Transporter 2 Company Name	8. US EPA ID Number
	. . . . .

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

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

11. Waste Shipping Name and Description	12. Containers No.	12. Containers Type	13. Total Quantity	14. Unit Wt/Vol
a. Industrial Waste Non-Regulated	00.6	DM	00.33.0	G
b.	. .	.	. . . .	.
c.	. .	.	. . . .	.
d.	. .	.	. . . .	.

D. Additional Descriptions for Materials Listed Above
A) 142-D01

E. Handling Codes for Wastes Listed Above

15. Special Handling Instructions and Additional Information

TRANSPORTER

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
Joseph Clark		1	20	90

17. Transporter 1 Acknowledgement of Receipt of Materials

Printed/Typed Name	Signature	Month	Day	Year
Joseph Clark		1	20	90

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		01	20	90

GENERATOR'S COPY

BES Corp Rev 11-89

Please print or type
Form designed for use on elite (12-pitch) typewriter

NON-HAZARDOUS WASTE MANIFEST

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

3. Generator's Name and Mailing Address
International Petroleum Cor
105 S. Alexander St
lant Ci Fla

4. Generator's Phone (813)

5. Transporter 1 Company Na
Internation Petro. Cor
6. US EPA Number
A.

7. Transporter 2 Company Name
8. US EPA ID Number

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

A. Transporter's Phone 813-754-150
B. Transporter's Phone
C. Facility's Phone
813-425-4884

11. Waste Shipping Name and Description	12. Containers No.	Type	13. Total Quant	14. Unit Wt/Vol
a. Industrial Waste Non- ulated	006	DM	00 30	G
b.				
c.				
d.				

D. Additional Descriptions for Materials Listed Above
A) 142-D01

E. Handling Codes for Wastes Listed Above

15. Special Handling Instructions and Additional Information

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: JOSEPH CLARC
Signature
Month 1 Day 20 Year 9

17. Transporter 1 Acknowledgement of Receipt of Materials
Printed/Typed Name: JOSEPH CLARK
Signature: Joseph Clark
Month 1 Day 20 Year 92

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 01 Day 20 Year 9

GENERATOR
TRANSPORTER
FACILITY

12-BLS-C6 Rev. 11/89

TRANSPORTER #1

SENDER:

- Complete items 1 and/or 2 for additional services. D. E. R.
- Complete items 3, and 4a & b.
- 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 Fee will provide you the signature of the person delivered to and the date of delivery.

APR 23 1993

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:

International Petroleum Corp.
Attn: Dany Allen
105 S. Alexander St
Plant City, Fl 33566

4a. Article Number
P 648 750 501

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

7. Date of Delivery 4/21/93

5. Signature (Addressee)
Reg Wood

6. Signature (Agent)

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

PS Form **3811**, November 1990 ☆U.S. GPO: 1991—287-066 **DOMESTIC RETURN RECEIPT**

P 648 750 501

Certified Mail Receipt
No Insurance Coverage Provided
Do not use for International Mail
(See Reverse)

UNITED STATES POSTAL SERVICE

Sent to International Petroleum Corp.	
Street & No. Attn: Dany Allen	
P.O., State & ZIP Code 105 S. Alexander St Plant City.	
Postage	$
Certified Fee 1.35	
Special Delivery Fee	
Restricted Delivery Fee	
Return Receipt Showing to Whom & Date Delivered	
Return Receipt Showing to Whom, Date, & Address of Delivery	
TOTAL Postage & Fees	$
Postmark or Date 4-19-93	

PS Form **3800**, June 1990

Eng

Florida Department of Environmental Regulation

Southwest District • 3804 Coconut Palm • Tampa, Florida 33619

Lawton Chiles, Governor 813-744-6100 Virginia B. Wetherell, Secretary

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

APR 19 1993

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

ATTN.:Mr. Garry Allen

WARNING NOTICE #WN93-0023HW29SWD
FLD 065 680 613

RE: International Petroleum Corporation
Used oil management

Dear Mr. Allen,

A hazardous waste compliance inspection was conducted at your facility on February 10 and 11, 1993. This inspection was conducted under the authority of Section 403.091, Florida Statutes, and Chapter 403, Part IV, Florida Statutes, in order to determine the compliance status of your facility with Title 40 Code of Federal Regulations Parts 260 through 268, as adopted in Florida Administrative Code Chapter 17-730.

During this inspection, possible violations of rules regarding hazardous waste management were noted. These possible violations are described in the "Summary of Violations" section of the attached inspection report.

You are advised that any activity at your facility that may be contributing to violations of the above described statutes and rules should be ceased immediately. Operation of a facility in violation of state statutes or rules may result in liability for damages and restoration, and the judicial imposition of civil penalties up to $50,000 per violation per day pursuant to Section 403.727, Florida Statutes.

International Petroleum Corporation
Warning Notice #WN93-0023HW29SWD

APR [redacted] 1993

You are requested to contact Kevin Bull of this office at (813)-744-6100 (ext. 389) within 10 calendar days of receipt of this Warning Notice to arrange a meeting with Department personnel to discuss the issues raised in this Warning Notice. You may wish to consult an attorney and to have the attorney attend the meeting with the Department.

PLEASE BE ADVISED that this Warning Notice is part of an agency investigation preliminary to agency action in accordance with Section 120.57(4), Florida Statutes. The purpose of this letter is to advise you of potential violations and to set up a meeting to discuss possible resolutions to any potential violations that may have occurred for which you may be responsible. Under the Department's agreement with the United States Environmental Protection Agency (EPA), a formal administrative complaint or "Notice of Violation" (NOV) must be issued within 120 days of the date of the attached inspection report. The issuance of the NOV may be avoided through the entry of a consent order or a demonstration that the listed violations did not occur. If the Department issues a Notice of Violation, and you are named as a party, you will be informed of your rights to contest any determination made by the Department in the Notice of Violation.

If after further investigation, the Department determines that the violation occurred, this matter may be resolved through the entry of a "Consent Order" which will include a compliance schedule and an appropriate penalty.

Sincerely

for Richard Garrity
Director of District Management
Southwest District

RDG/kmb

Enclosure

cc: Satish Kastury, BWP&R
Don Trussell, BWP&R
Alan Farmer, USEPA, Region IV
Compliance File

Florida Department of Environmental Regulation

Southwest District • 3804 Coconut Palm Dr. • Tampa, Florida 33619

Lawton Chiles, Governor 813-744-6100 Virginia Wetherell, Secretary

HAZARDOUS WASTE INSPECTION REPORT

1. INSPECTION REPORT____COMPLAINT__X__ROUTINE____FOLLOW-UP____PERMITTING

FACILITY NAME International Petroleum Corporation DER/EPA ID # FLD 065 680 613

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

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

COUNTY Hillsborough PHONE (813) 754-1504 DATE 02-10-93/02-11-93 TIME 1030-1215/1200-1330 hours

TYPE OF FACILITY:

Generator	Storage	Treatment
_____Generator (>1000 kg/month)	_____Container	_____Tank
_____SQG (100-1000 kg/month)	_____Tank	_____Land Treatment
_____CESQG (<100 kg/month)	_____Waste Pile	_____Thermal
	_____Surface Impoundment	_____Chem/Phys/Bio
Transporter		_____Incinerator
_____Transporter	Disposal	_____Surface Impound.
_____Transfer Facility	_____Landfill	
_____Non-Handler	_____Surface Impoundment	__X__Used Oil Marketer
	_____Waste Pile	

2. Applicable Regulations:

____40 CFR 261.5	____40 CFR 262	____40 CFR 263	____40 CFR 264
____40 CFR 265	__X__40 CFR 266	____40 CFR 268	__X__17-710 FAC

3. Responsible Official:

Garry R. Allen - President

4. Survey Participants and Principal Inspector:

Garry R. Allen - President; Frank Shibetti - Vice-President; Tony Malatino - Consultant
Kevin Bull - FDER
Jeff Schoenbacher - FDER

5. Facility Latitude: 28° 00' 30" Longitude: 82° 08' 00"

6. Type of Ownership: FEDERAL STATE COUNTY MUNICIPAL PRIVATE

7. Permit No.:_____ Date Issued:_____ Exp. Date:_____

8. Facility Description:

International Petroleum Corporation (IPC), a wholly owned subsidiary of International Recovery Corporation, recycles used oil and associated petroleum-contaminated materials including used oil filters, used antifreeze, and contaminated waste water. IPC, which currently employs 32 individuals and has seven trucks in operation, has been located at this 8.3 acre since 1980.

The summary of the solid waste of significance generated by IPC is contained in the table below.

Process	Significant Solid Waste	EPA Haz. Waste No.	Quantity	Disposition	Exclusion/ Exemption
Used oil distillation	Re-refined oil	N/A	Undeter-mined	Various	261.6(a)(2)
Oil-contam. water distill.	Waste water	N/A	25,000-50,00 per mo.	Plant City POTW	261.4(a)(2)
Oil filter crusher	Scrap metal	N/A	6,000 - 8,000 lbs. per mo.	Bayou Steel	261.6(a)(3)
Used anti-freeze distill.	Used antifreeze	N/A	1,000 gallons per month	Plant City POTW	Non-haz.
Tank field pump filters	Sludge	Note 1	See text	Clark Enviro mental	Note 1

Note 1 - Laboratory analysis were unavailable at the time of inspection. Subsequent laboratory analysis by Department confirmed that pump basket-filter sludge is non-hazardous.

IPC collects used oil from across the State of Florida and re-refines the oil in a distillation process. IPC is permitted under Chapter 17-710, F.A.C., to transport, collect, and recycle used oil under certification number 50005-UO. According to Mr. Garry Allen, the total halogen content of a used oil shipment, picked up by IPC, is indicated by a "halogen sniffer" (Model HLD 440) at the time the shipment is accepted by the driver. Also, for all shipments of used oil, regardless of whether they are hauled by IPC vehicles or other haulers, a hazardous waste determination is performed prior to pumping a vehicle's contents to the IPC tank farm. According to the examined documents, the laboratory work for IPC is performed by International Environmental Services, a laboratory that shares the site with IPC, and which is also a subsidiary of International Recovery Corporation. Laboratory results for used oil incoming to IPC were examined, and these documents apparently indicate that no off-specification oil is accepted by IPC.

According to company literature, the distillation process used by IPC occurs in two stages: first is an atmospheric distillation process; and secondly is a vacuum distillation process. Light fuels recovered from the distillation process are used as a fuel at the facility, while any water is discharged to the facility waste waster treatment unit (WWTU). The on-specification oil, which is the result of the distillation process and which, according to Mr. Allen, is a #5 fuel oil, is then marketed largely to asphalt plants and the phosphate

industry. Laboratory results for recycled oil processed by IPC were examined, and indicate that all recycled oil is on-specification.

IPC also collects waste water that is contaminated with oil and passes this material through the distillation process. According to Mr. Frank Shibetti, approximately 25,000 to 50,000 gallons per month are processed in this manner. All waters passing through the WWTU are discharged to the City of Plant City POTW under permit #1993-20. Laboratory results were examined pertaining to processed waste water indicating no discrepancies with the pretreatment permit.

According to company literature, 55-gallon drums are supplied by IPC to its clients for the collection of used oil filters. IPC collects both oil filters that have been crushed by their clients or uncrushed oil filters. The uncrushed oil filters, upon collection by IPC, are returned to the Plant City site wherein they are crushed and drained. According to Mr. Shibetti, after approximately 48,000 pounds of crushed oil filters are collected in 55-gallon drums, which takes approximately six to eight weeks, they are sold to Bayou Steel in Laplace, LA. According to Mr. Shibetti, Bayou Steel uses the crushed oil filters to manufacture #5 reinforcement bars for the construction industry.

Used anti-freeze is also accepted by IPC, according to Mr. Allen, wherein this material undergoes the same distillation process as that for used oil. Prior to accepting the used antifreeze, however, IPC tests the ethylene glycol for (or requires results of an independent laboratory for) TCLP lead content. Approximately 1000 gallons per month is reclaimed through the distillation process. Upon processing, the recycled antifreeze is then discharged to the WWTU prior to final disposition to the City of Plant City POTW.

The tank field of IPC consists of steel above-ground and on-the-ground tanks. The total tank capacity of the tank field is approximately 1,200,000 gallons in the 16 tanks that are used to store used and re-refined oil. Also within the tank field are tanks to store oil-contaminated water with a capacity of approximately 100,000 gallons between the two tanks. According to Mr. Allen and Mr. Shibetti, the tanks have not been cleaned out since being brought into operation. Secondary containment of the tank field was found to be in adequate condition. Liquid collected in the sumps within secondary containment is pumped directly to the contaminated water tanks. When sludge is cleaned out of the sumps by IPC personnel it is placed in one of two five-gallon pails located near the tank field, according to Mr. Shibetti and Mr. Allen. Pumps in the tank field area, which pump used oil through the tank system, have basket filters on their supply side (see Photo #1). According to Mr. Shibetti and Mr. Allen, these basket filters are emptied every couple of days into the same five-gallon pails in which the sump sludge is placed (see Photo #2). The pails are then emptied into 55-gallon drums. According to Mr. Shibetti and Mr. Allen, approximately nine 55-gallon drums in a three-month period of this material is accumulated prior to off-site transportation to Clark Environmental, Inc. in Mulberry, FL. No analytical results were immediately available on the nature of this material, although Mr. Tony Malatino said that this information was available from the laboratory document storage area. These documents were never received from Mr. Malatino.

An examination of the parking area for the used oil transportation vehicles indicated that spillage of oil has occurred in this area. As the parking area slopes to the east, and containment of this area is not continuous around the parking area, run-off carries oil spillage outside the parking area. According to Mr. Malatino, every one to two hours an IPC employee examines the parking area for spillage, and, upon finding such, uses absorbent rags to clean-up the spilled oil. Soil and rock in the run-off area adjacent to the parking area (see Photo #3) were found to be stained with an iridescent material (see Photo #4). According to Mr.

Malatino, the staining observed outside the containment area is the result of the recent resurfacing of the parking area.

Department investigators were then escorted to the oil filter crushing area where Mr. Shibetti gave a demonstration of the crushing process. In this same area is a parts washer that uses a water-based cleaner manufactured by Sea-Wash. An examination of the company literature for the Sea-Wash detergent indicates that the detergent is non-hazardous. According to Mr. Shibetti, the parts washer is used infrequently, and as such, detergent and water are added as needed. The parts washer, according to Mr. Shibetti, has not required servicing (draining and cleaning) to this point in time.

On February 11, 1993, Department investigators returned to IPC to obtain samples of the sludge, which is a combination of sump waste and pump filter basket waste, from the five gallon pails situated in the tank field. Four samples in all were taken--two samples were retained by Mr. Malatino for, according to Mr. Malatino, submission to International Environmental Services, while the other two samples were retained by the Department for submission to the Department's Tallahassee laboratory for analysis of TCLP metals, volatiles, and semi-volatiles. On March 31, 1993, the final analytical report was received from the Department's Tallahassee laboratory, and the results for TCLP metals, volatiles, and semi-volatiles indicated that no maximum allowable concentrations, as per 40 CFR 261.24, were exceeded.

Also, on February 11, 1993, Department investigators went to Clark Environmental, Inc (CEI), in Mulberry, FL, which, according to Mr. Shibetti and Mr. Allen, is the point of disposition for non-hazardous waste from IPC. Mrs. Beth Clark, the Registered Agent of CEI, retrieved the file pertaining to IPC. According to CEI documents, from August 8, 1991 through to December 10, 1992 CEI accepted 137 drums (55-gallon) and 140,000 pounds (in tanker trucks) of material that is identified either as "sludge", "non-hazardous", "soil", or "non-regulated". According to these documents, there have been a total of 20 shipments of waste from IPC in this 16-month period, however analytical results for only two shipments were found in CEI files. According to Mr. Allen and Mr. Shibetti, this material is the sludge, which is a combined sump waste and pump filter-basket waste. Large shipments of this material are the result of a general house-keeping at IPC, according to Mr. Shibetti and Mr. Allen. Following is a description of the analytical results for the two shipments that were shipped from IPC to CEI for which there is available data.

According to the documents obtained from CEI, 27 drums of "non-regulated" waste was shipped from IPC to CEI, on August 19, 1991. According to laboratory results, on International Environmental Services letterhead, this shipment consisted of 13 drums of oil and 14 drums of soil. Concentrations for total cadmium, chromium, lead, and organic halogens, and TCLP lead were determined for a composite oil sample. Analysis of the composite sample of the oil indicates that the total lead content for the composite was 200 mg/kg, in excess of the used oil specification in 40 CFR 266.40. Total halogens for this composite sample were 223 mg/kg. According to 40 CFR 266.41, a person may market off-specification used oil for energy recovery only to burners and other marketers who have notified EPA of their used oil management activities. According to Department documents, however, CEI is not a burner or a marketer of used oil, and therefore it must be presumed that shipment of the oil to CEI was for the purpose of disposal. For the purposes of disposal, the analytical data outlined above is insufficient to determine if that waste (used oil) is hazardous waste. Prior to disposal of the used oil, it should have been determined if this waste was hazardous waste by measuring all TCLP contaminants, ignitability, corrosivity, and reactivity.

A composite sample of the soil in this same shipment was, according to laboratory documents of International Environmental Services, analyzed for total volatile organic aromatics, total recoverable petroleum hydrocarbons, arsenic, barium, cadmium, chromium, lead, mercury, selenium, silver, TCLP benzene and lead, and total halogens. As the total arsenic concentration of the soil composite approached the maximum concentration allowed under 17-775 F.A.C. (total arsenic for soil = 54.4 mg/L; maximum concentration = 55 mg/L), the soil is suspect of containing a hazardous waste, and thus should have been screened for other contaminants as per 17-775.410(4) F.A.C.

On January 31, 1992, six drums of soil were shipped from IPC to CEI, according to documents obtained from CEI. According to these documents, the only analytical data available was for TCLP tetrachloroethylene. Although this soil does not exceed the maximum concentration for TCLP tetrachloethylene, this was not sufficient analysis to determine if that waste was hazardous waste. Prior to disposal, it should have been determined if the six drums of soil were hazardous waste by measuring all TCLP contaminants, ignitability, corrosivity, and reactivity.

9. Summary of 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 hazardous waste. Such a determination had not occurred for 18 of 20 shipments of waste from International Petroleum Corporation to Clark Environmental, Inc., and was incomplete for two of the 20 shipments.

403.751(1)(b), F.S. No person may discharge used oil into sewers, drainage systems, septic tanks, surface or ground waters, watercourses, or marine waters. Discharge of oil-contaminated run-off has occurred at International Petroleum Corporation in the area next to the used oil transport vehicle parking zone.

10. Corrective Actions:

40 CFR 262.11 International Petroleum Corporation shall immediately cease disposing of waste associated with used oil storage or distillation, or contaminated materials, without first performing a hazardous waste determination. This does not include oil filters, but does include, but is not limited to, sludge from sumps, sludge from pump basket-filters, sludge from distillation process, sludge from tank clean-out, used oil (which is not to be recycled), and contaminated soils and waters. Sampling and hazardous waste determination shall be in accordance with appropriate regulations. All reports shall be made available for perusal at International Petroleum Corporation, and retained in accordance with the appropriate regulations.

403.751(1)(b), F.S. International Petroleum Corporation shall cease to discharge used oil to the run-off area adjacent to the used oil transport vehicle parking area. International Petroleum Corporation shall prepare and submit to the Department a Preliminary Contamination Assessment Plan (PCAP) to determine the extent of contamination of the soil, sediment, surface water or groundwater in the run-off area adjacent to the used oil transport vehicle parking zone. The PCAP shall be performed in accordance with Appendix I to this report. Further action may be required by the Department upon assessment of the Preliminary Contamination Assessment Report (PCAR).

International Petroleum Corporation
FLD 065 680 613

Report Prepared By: Kevin Bull Date: 3-31-93

Kevin Bull
Environmental Specialist I

Approved By: Date: 3/31/93

Elizabeth Knauss
Environmental Supervisor I

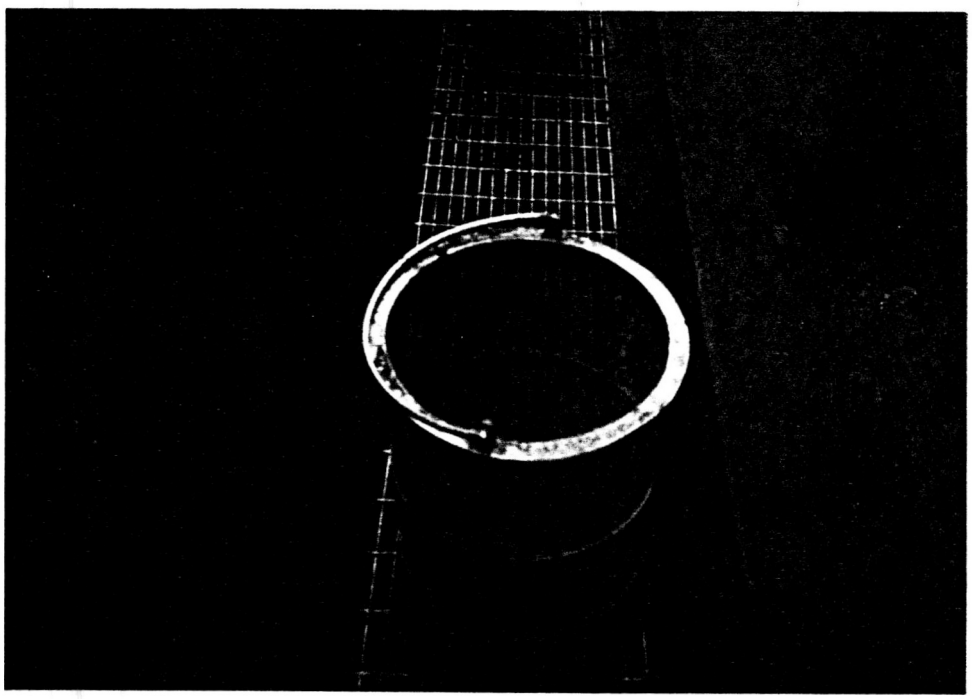


Photo #1 - Pump basket-filter

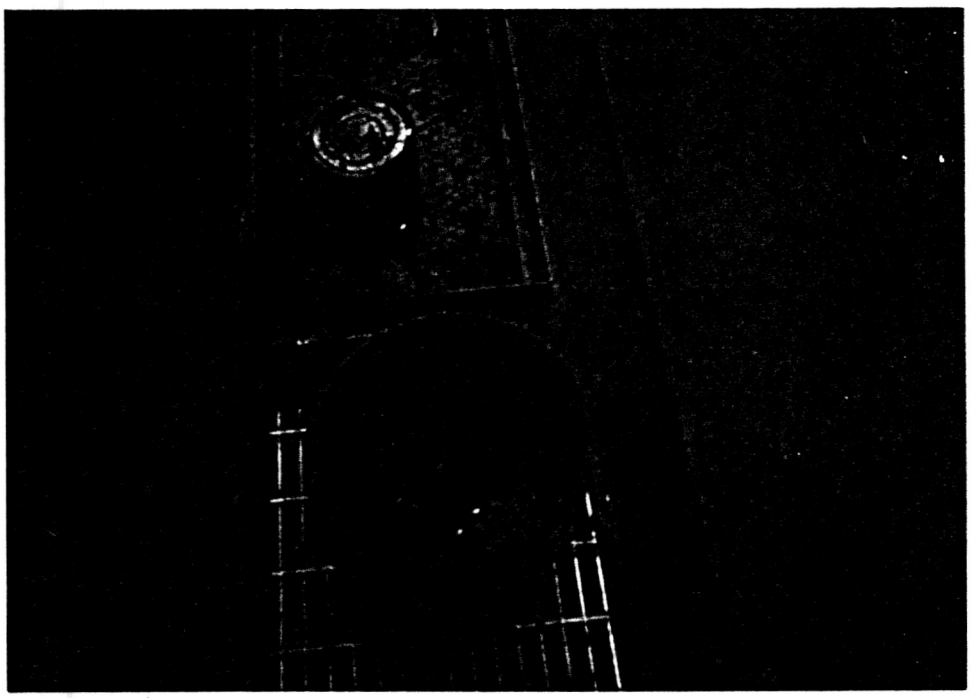


Photo #2 - Combined sludge from sump and pump basket-filters

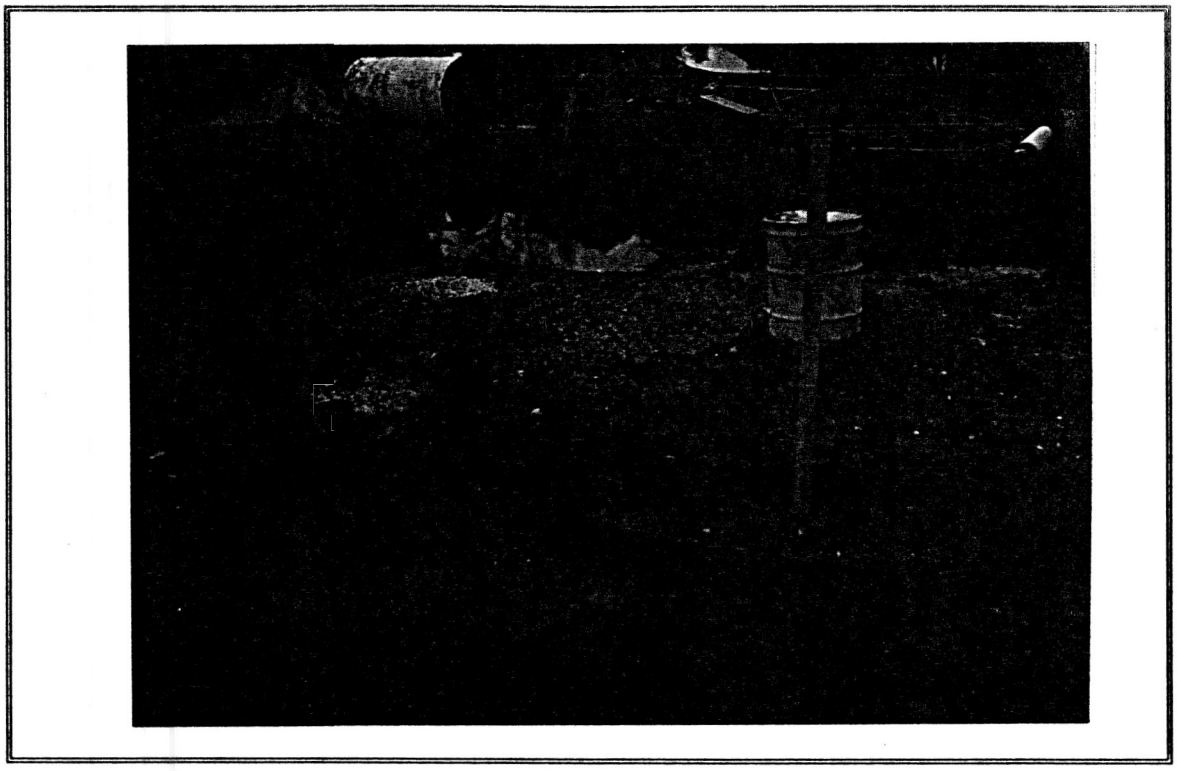


Photo #3 - Run-off area adjacent to used oil transport vehicle parking zone

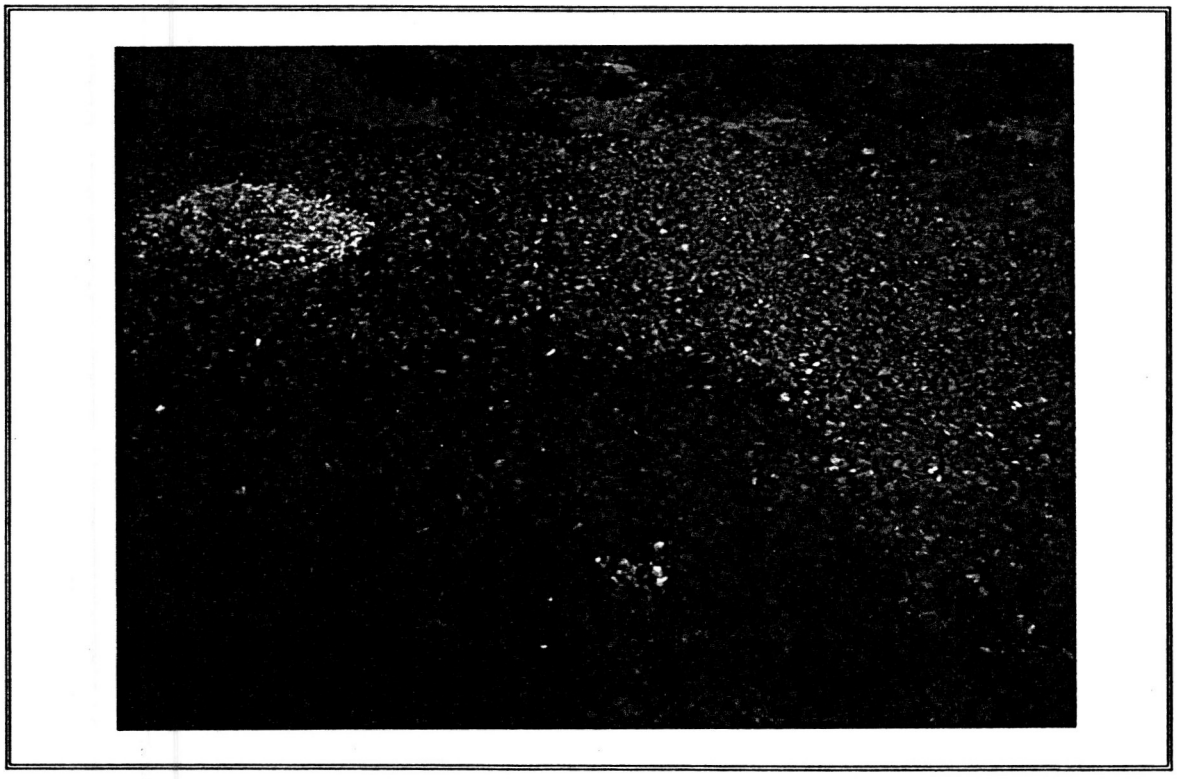


Photo #4 - Visual staining of run-off area

Florida Department of

Memorandum

Environmental Protection

ENFORCEMENT/COMPLIANCE COVER MEMO

TO: ____ Richard Garrity, DDM
__X__ William Kutash, ENV. ADM.
____ OGC, ATTN: _____

FROM/THROUGH: William Kutash, ENVIRONMENTAL ADMINISTRATOR
Gary Santti, PROGRAM SUPERVISOR
Elizabeth Knauss, ENVIRONMENTAL SPECIALIST III
Timyn Rice, ENVIRONMENTAL SPECIALIST II

DATE: February 14, 1994
FILE NAME: International Petroleum CASE No. _____
PROGRAM: Hazardous Waste COUNTY: Hillsborough

TYPE OF DOCUMENT:
Closure of Warning Notice

Summary of Violations: Failure to conduct waste determination of filter basket sludge. Discharge of used oil to the ground

Summary of Corrective Actions: Sampling of wastes has been conducted and indicates that the sludge is non-hazardous and the soils are not contaminated.

State of Florida
Department of Environmental Regulation

District Routing Slip

To: Beth Krauss Date: 5-6-93

C.C. To:

	Pensacola	**Northwest District**	
	Panama City	Northwest District Branch Office	
	Tallahassee	Northwest District Branch Office	
	Apalachicola	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 ☐ Reply Required ☐ Info Only ☐

Date Due _____ Date Due _____

Comments:

D.E.R.

MAY 07 1993

SOUTHWEST DISTRICT
TAMPA

From: Linda Lakes Tel.:

10-31-90

State of Florida
DEPARTMENT OF ENVIRONMENTAL REGULATION

For Routing To Other Than The Addressee

To: _____ Location: _____
To: _____ Location: _____
To: _____ Location: _____
From: _____ Date: _____

Interoffice Memorandum

TO: Beth Knauss, ES III
Southwest District

THROUGH: Satish Kastury, Administrator MRR for SK
Hazardous Waste Regulation Section

FROM: Michael Redig, Environmental Manager
Linda Lakes, ES III ll

DATE: April 23, 1992

SUBJECT: International Petroleum Corp
FLD 065 680 613

D. E. R.
MAY - 7 1993
SOUTHWEST DISTRICT
TAMPA

Attached please find our review of the penalty authorization for International Petroleum Corporation (IPC), 105 South Alexander Street, in Plant City. We agree with your penalty calculations.

The inspection report indicates that IPC, before accepting used antifreeze, tests it for TCLP lead content. Current Department policy on testing antifreeze is outlined in a July 9, 1992, letter to Mr. Kim Biser at Sparkle Corporation (copy attached). Since the adoption of the TC rule, antifreeze should be analyzed for all TC constituents except pesticides to determine if it's a hazardous waste.

/ll
Attachment

cc: Larry Morgan, OGC
Agusta Posner, OGC

Florida Department of Environmental Regulation
Hazardous Waste Regulation Section

HPV Penalty Reviews

FACILITY: International Petroleum Corp **EPA ID:** FLD 065 680 613 **INSPECTION DATE:** 2/10 -11/93
LOCATION: Plant City **DISTRICT:** SW

VIOLATION TYPE	DESCRIPTION	PHR	P/H	E/D	PENALTY	MD DAYS	MD $	EB	TOTAL
1. 40 CFR 262.11	HW DETERMINATION	18	MOD	MAJOR	$ 9,500			$ 26,784	$ 36,284
2. 403.751(1)(B) fs	USED OIL DISCHARGE		MOD	MAJOR	$ 3,900				$ 3,900
				TOTALS	$ 13,400				$ 40,184

EB - Economic Benefit
MD - Multi-days
E/D - Extent of Deviation
P - Pending
P/H - Potential for Harm
PEN - Gravity Based Penalty
PHR - Potential for Harm Ranking

Reviewed by: Linda Lakes
Date: 4/23/93

FYI

OERTEL, HOFFMAN, FERNANDEZ & COLE, P. A.

ATTORNEYS AT LAW

M. CHRISTOPHER BRYANT
R. L. CALEEN, JR.
C. ANTHONY CLEVELAND
TERRY COLE
ROBERT C. DOWNIE, II
SEGUNDO J. FERNANDEZ
KENNETH F. HOFFMAN
KENNETH G. OERTEL
PATRICIA A. RENOVITCH
SCOTT SHIRLEY
THOMAS G. TOMASELLO
W. DAVID WATKINS
TIMOTHY P. ATKINSON

SUITE C
2700 BLAIR STONE ROAD
TALLAHASSEE, FLORIDA 32301

MAILING ADDRESS:
POST OFFICE BOX 6507
TALLAHASSEE, FLORIDA 32314-6507

TELEPHONE (904) 877-0099
FACSIMILE (904) 877-0981

NORMAN H. HORTON, JR.
OF COUNSEL

JOHN H. MILLICAN
ENVIRONMENTAL CONSULTANT
(NOT A MEMBER OF THE FLORIDA BAR)

J. R SUBRAMANI, PH. D., P. E.
ENVIRONMENTAL CONSULTANT
(NOT A MEMBER OF THE FLORIDA BAR)

October 14, 1993

D.E.P.

OCT 18 1993

SOUTHWEST DISTRICT
TAMPA

John Ruddell, Director
Division of Waste Management
Department of Environmental Protection
2600 Blair Stone Road
Tallahassee, Florida 32399-2400

RE: Testing and Disposal of Waste Antifreeze

Dear Mr. Ruddell:

Our firm represents International Petroleum Corporation, owner and operator of a used oil re-refinery in Plant City, Florida. Its operations have been, and are continuing to be, substantially adversely affected by the Department's apparent decision to rescind or change its February 2, 1988, guidance on RCRA testing of waste antifreeze.

If the Department has rescinded or changed its formal guidance, previously disseminated to affected parties, it did so without giving those affected adequate notice and opportunity to meaningfully comment or participate in the policy change. Moreover, the change, if it has occurred, was made on the basis of a sparse submittal of waste antifreeze testing data by Safety-Kleen Corporation. That data and its use as a basis for changing the previous testing guidance is now open to serious question. Even the proponent, Safety-Kleen, now advises that it has performed additional testing which refutes its previous data and concludes that waste antifreeze is non-hazardous.

We respectfully request that, after conferring with staff, you consider taking two actions:

1. Issue a clear directive to the District hazardous waste managers to adhere, until advised otherwise, to the last Department-wide guidance of February 2, 1988 relating to the testing and disposal of waste antifreeze.

2. Schedule a meeting with International Petroleum Corporation and other affected parties to discuss and agree on a plan, with timetable, for evaluating further testing

data and reaching a Department decision on whether any change in the February 2, 1988, guidance is justified.

Here is what has transpired to this point. Attachment I shows the Department's February 2, 1988, guidance ("To Whom It May Concern") on testing and disposal of waste antifreeze. The guidance allows a baseline profile to be based on testing (4 consecutive quarters) for E.P. Toxicity for lead (Pb) or total (Pb). If testing shows the material to be non-hazardous (less than 5 ppm lead) the generator can dispose of it as a non-hazardous waste.

Attachment II is the 4-page submittal by Safety-Kleen Corporation on July 17, 1991, which concluded that waste antifreeze is TCLP hazardous for lead and percehloroethylene.

Attachment III is a letter dated July 9, 1992, from Satish Kastury, Administrator, Hazardous Waste Regulation, to Mr. Kim Biser, Sparkle Corporation, indicating that lead is not the sole constituent of concern in waste antifreeze and asking for a waste analysis for all TOC constituents (organics and metals) except pesticides.

Finally, Attachment IV is a letter dated September 3, 1993 from John White, Environmental Supervisor, Hazardous Waste Regulation, Central District, to International Petroleum Corporation indicating, apparently, that a complete TCLP on all constituents must be performed prior to transport or disposal of waste antifreeze.

In an effort to supply the Department with additional information on the characteristics of waste antifreeze, International Petroleum Corporation recently collected its wastes from various sources and ran a complete TCLP analysis (excluding pesticides) on a representative sample. The results show that no concentration of any constituent beyond the regulated level established by 40 C.F.R. 261.24 was found in the waste antifreeze. The consultant's report is enclosed as Attachment V.

In the field, some staff may be misconstruing what the Department's policy is or should be on the testing of waste antifreeze for the toxicity characteristic. No uniform or informed Department position has been established or is being disseminated to the districts. Moreover, it appears that the only basis for the Department to alter its February 1988 guidance -- submittal of data by Safety-Kleen in 1991 -- is now being refuted by new data collected by Safety-Kleen.

Raoul Clark is aware of the concerns and problems arising from diverse Department views on the subject and has, we understand, suggested that the districts adhere to the

February 1988 guidance (or at least to a "holding pattern") until the Department is able to examine the additional data and reach an informed decision. International Petroleum Corporation would like to participate in the Department's development on a new policy on TCLP testing of waste antifreeze. I expect others affected by the Department's view would also like to participate.

We request, that you reinforce Mr. Clark's suggestion with a directive from your office so that the districts will not act precipitously or in an inconsistent manner while the testing data is being submitted and reviewed.

Finally, we ask that you schedule a meeting to discuss and arrive at a plan of action and timetable to address the subject of any change in Department policy on this subject.

I know you have many demands on your time but this an urgent matter which we believe warrants your immediate attention. Thank you for any assistance you may be able to offer.

Sincerely,

R. L. Caleen, Jr.

Attachments

cc: Garry Allen, President, IPC
Raoul Clark
Satish Kastury
Michael Redig
Don White
Beth Knauss

RLC:Ruddell-Ltr/kj

Florida Department of Environmental Regulation
Twin Towers Office Bldg. • 2600 Blair Stone Road • Tallahassee, Florida 32399-2400
Bob Martinez, Governor Dale Twachtmann, Secretary John Shearer, Assistant Secretar

February 2, 1988

RE: Testing and Disposal of Waste Anti-freeze

To Whom It May Concern:

A person who generates waste anti-freeze on site must determine whether or not he has a hazardous waste or required by Title 40 CFR Section 262.11. This determination for waste anti-freeze may be done each time a regulated quantity of waste (greater than 100 kg) is generated or it may be done quarterly (every 3 months) for a minimum of four (4) consecutive quarters. The test to be initiated is the E.P. Toxicity Test for Lead (Pb), which must be conducted on a representative sample of the waste (see attached). A total Pb determination will also suffice. The testing and analysis program should be repeated. If the generator is not notified or has reason to believe that the process generating the waste has changed. The generator must keep the waste analysis data to document that he is managing the waste in a proper manner.

If the waste anti-freeze is determined to be a non-hazardous waste (less than 5 ppm lead), then the generator can dispose of it as a non-hazardous industrial waste. If said waste becomes hazardous (5 ppm or greater) at any time, then all applicable hazardous waste regulations will apply. Also be advised that non-hazardous spent anti-freeze cannot be disposed of on the ground, in a septic tank, in a storm sewer or in a dumpster.

Should you have any questions concerning this matter, please contact your DER district office or the Hazardous Waste Program Staff in Tallahassee at (804)488-0300.

— ATTACHMENT I —

Post-it™ brand fax transmittal memo 7671 | # of pages ▸

To Rip Caleen	From Glen Ferrigin
Co.	Co. FDEP
Dept.	Phone # 488 0300
Fax # 877-0981	Fax #

Post-it™ brand fax transmittal memo 7671 | # of pages ▸ 4

To Raoul Clarke	From Denis Pascavani
Co.	Co. Safety-Kleen
Dept.	Phone #
Fax #	Fax # X2165

July 17, 1991

RAA

Mr. Don R. Clay
U.S. Environmental Protection Agency
401 M Street, S.W.
Washington, D.C. 20460

Dear ~~Mr. Clay~~ Don:

During 1991 Safety-Kleen Corp. began handling all waste antifreeze as hazardous waste due to preliminary data generated using the Federal Toxicity Characteristic Leaching Procedure (TCLP). We have now completed our study and have enclosed a copy of our report for your agency's use. The report summarizes data from over 100 samples which show that antifreeze is TCLP hazardous for lead and perchloroethylene. Specifically, 47% of the samples tested hazardous for lead, while 39% were hazardous for perchloroethylene. In combination 58% of all samples taken were hazardous for lead, perchloroethylene, or both.

Safety-Kleen has notified its antifreeze customers that we will handle the waste antifreeze only as hazardous waste, unless they can provide TCLP data which establishes that the specific shipment is not.

I would very much appreciate any efforts you might take to disseminate this information within your organization, since some of our customers have had difficulty in obtaining RCRA identification numbers necessary to allow the handling of these wastes. It appears that some states and regional offices have not granted I.D. numbers because they do not believe antifreeze is hazardous waste.

Should you or your staff have any questions about these results, please contact me.

Sincerely,

Bill

Basil G. Constantelos
Director - Environmental Affairs

BGC/bb
Enclosure

cc: Sylvia K. Lowrance, Director - Office of Solid Waste
U.S. EPA Hazardous Waste Division Directors Regions 1 - 10
State Solid and Hazardous Waste Directors

— ATTACHMENT II

SAFETY-KLEEN CORPORATION

MANTEUFFEL TECHNICAL CENTER
ELK GROVE VILLAGE, IL

WASTE ANTIFREEZE TCLP DATA

JUNE 1991

The results on lead and perc are not surprising. Though it is being phased out of new radiator production, lead remains a common component of radiator solder. Perc is commonly used by auto manufacturers as a degreaser of radiators prior to installation.

Note that even the average values of lead and perc each exceed the EPA threshold. The computed data upper limit (using the Weibull distribution) greatly exceeds the threshold for both contaminants.

ASTM Data

Data on waste vehicular antifreeze published independently by the ASTM D15 Committee on Engine Coolants are shown in Exhibit 2. Note that over 60% of samples tested contained lead at a levels exceeding the EPA threshold. Both the shape of the data distribution and the percentage of samples that are hazardous compare similarly to Safety-Kleen's data.

Other Contaminants

Other hazardous contaminants, such as benzene, were found present in a few of the samples tested. The prevalence of benzene in auto shops via gasoline and solvents will, through cross-contamination, cause some batches to occasionally exceed its EPA threshold.

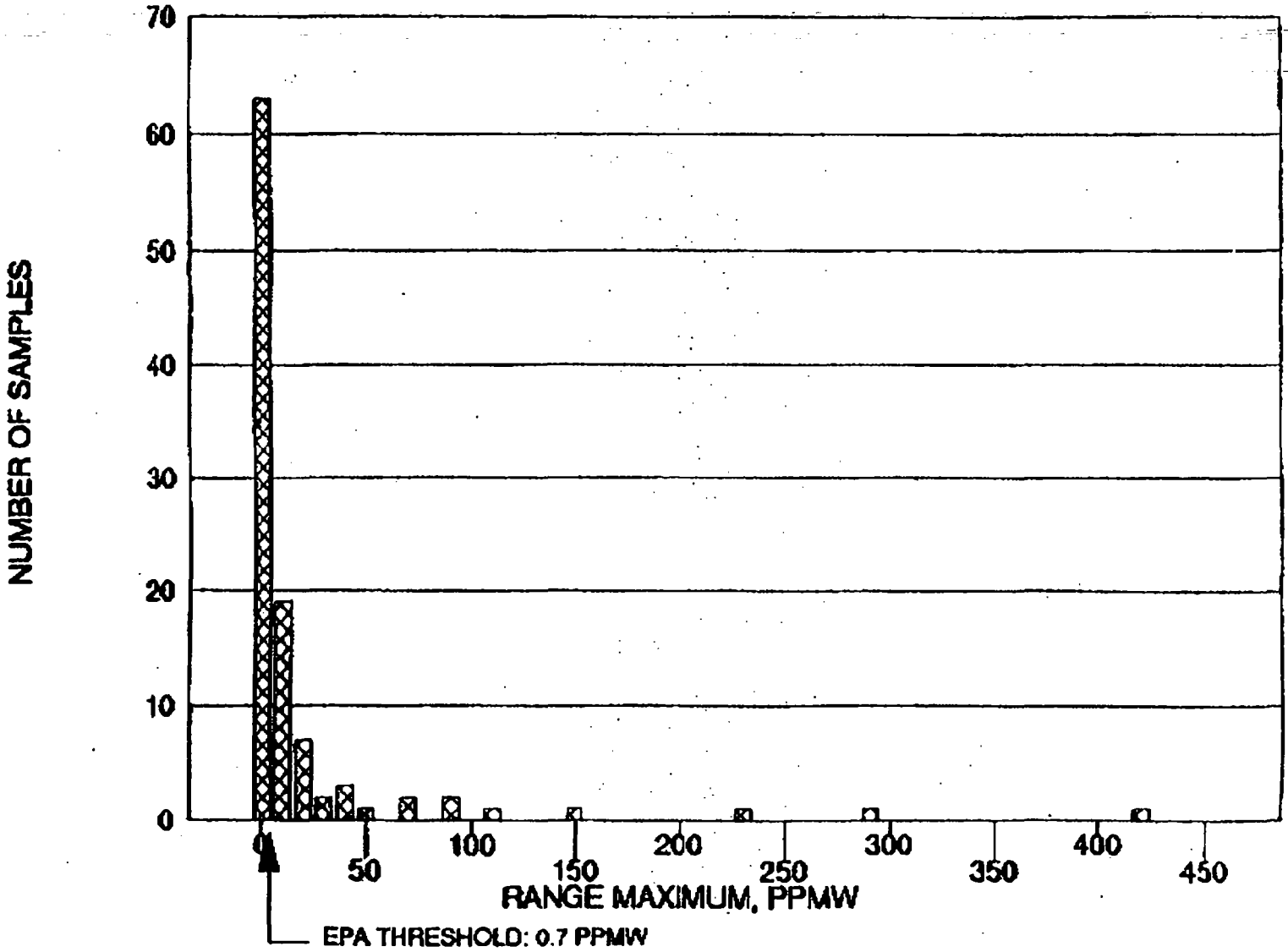
Conclusion

Lead and perc are typical contaminants of waste vehicular antifreeze. Both are naturally present in the manufacture of automobiles. Both Safety-Kleen and independent ASTM data show that more than 50% of randomly collected antifreeze samples were found to be TCLP-hazardous. In addition, other hazardous contaminants from gasoline and commonly used solvents may be present due to cross contamination in auto shops.

The preponderance of data supports the conclusion that waste antifreeze must in general be considered a hazardous waste. In view of this information, to dispose of a given batch of waste antifreeze as a non-hazardous waste without proving it so via TCLP analysis would appear to violate the EPA regulation. Due to the high cost of TCLP testing it is impractical to test small quantities of used antifreeze under the TCLP protocol. Safety-Kleen sees no other option than to manage used antifreeze as a TCLP-hazardous waste.

SAFETY-KLEEN ANTIFREEZE TCLP DATA, 1991

EXHIBIT 1.2 PERCHLOROETHYLENE



Twin Towers Office Bldg. • 2600 Blair Stone Road • Tallahassee, Florida 32399-2400

Lawton Chiles, Governor

Carol M. Browner, Secretary

Post-it™ brand fax transmittal memo 7671 | # of pages ▸ 4

To Tony Malstrom	From Glen Perrigan
Co.	Co. FDEP
Dept.	Phone # 904 488 0300
Fax # 813 648 4285	Fax #

July 9, 1992

Mr. Kim Biser, Vice President
Environmental Compliance/Health/Safety
Sparkle Corporation
Post Office Box 25456
Tampa, Florida 33622-5456

RE: FLD982121592

Dear Mr. Biser:

We have evaluated your antifreeze (waste ethylene glycol) disposal proposal and have the following comments concerning your proposed procedures for the analysis, management and disposal of the material.

Lead is not the sole constituent of concern in our experience with this waste stream. Therefore, the waste analysis plan should be for all TOC constituents (organics and metals) except pesticides. Total lead is of no value to the determination of hazardous waste characteristics and should be dropped as a concept for regulatory compliance purposes.

The concept of four quarterly samples to establish a baseline profile is acceptable so long as retesting is done upon process changes to establish a new four (4) quarter baseline.

Manifesting should be done on the basis of the outcome of the TC waste analysis profile. The use of a manifest for non-hazardous waste is at the generator's discretion but is an acceptable alternative to the State. An LDR notification form must accompany each load of manifested waste subject to the Land Disposal Restriction to avoid an enforcement action by Region IV, US EPA.

Recycled Paper

ATTACHMENT III

Ms. Kim Biser
July 9, 1992
Page Two

The transfer facilities involved in this program must amend the notifications required by Rule 17-730.171, F.A.C., (Form number(-8700-12) to include the waste anti-freeze (ethylene glycol solution). The TSD facility (HO29-167443) must submit a permit modification request to manage the waste antifreeze solution as waste stream as per Rules 17-730.290(1)(c) & (d) F.A.C., "Permit Modifications," which states that," ... good cause [for permit modifications] shall include, but not be limited to, the following:

(1)
(c) There are alterations in the facility after permit issuance which justify different permit conditions but do not require a construction permit.
(d) The causes set forth in 40 CFR 270.41 and 270.42.

40 CFR 270.42 includes-Appendix I, "Classification of Permit Modification." This proposal is a class 2 permit modification, pursuant to

Section F. Containers

3. Storage of different Wastes in containers, except as provided in (F) (4) below:
...b: That do not require additional or different management practices from those authorized in the permit.

The Department considers different or additional wastes brought on site for management practices of any kind to be subject to the facility's permit conditions in effect at that time. Therefore, in order for your proposal to comply with the RCRA regulations, you must seek and obtain a Class II permit modification before managing, at a permitted facility, any ethylene glycol (antifreeze) solutions that are characterized as hazardous waste.

Sincerely,

for Satish Kastury, Administrator
Hazardous Waste Regulation

SK/MXRO

cc: Lynnn R. Milanian, DER/Tampa

Florida Department of
Environmental Protection

Central District
3319 Maguire Boulevard, Suite 232
Orlando, Florida 32803-3767

Lawton Chiles
Governor

Virginia B. Wetherell
Secretary

September 3, 1993

CERTIFIED MAIL
P 128 890 290

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

OCD-HW-93-0582

Attn: Frank Shibetti, Vice President

Hillsborough County - HW
International Petroleum Corporation
Antifreeze Disposal

Dear Mr. Shibetti:

The Department conducted a compliance inspection at Mobile Lube Express located at 1625 South Conway Road, Orlando, on May 11, 1993. One of the concerns the Department had was the disposal of their waste antifreeze. At the time of the inspection the manager on site was uncertain if any testing was performed on their antifreeze prior to disposal.

Upon talking with Steve Carmen, General Manager, the Department found that International Petroleum Corporation disposed of their waste antifreeze. Mr. Carmen submitted analytical testing data and other documents related to the disposal of waste antifreeze. According to the data submitted, total lead was performed on the waste antifreeze. Waste antifreeze may contain other hazardous constituents other than lead.

A hazardous waste determination must be performed on waste antifreeze prior to transport/disposal.

If International Petroleum corporation is going to continue transporting waste antifreeze, please make sure the generator has performed a proper hazardous waste determination.

If you have any questions please call Jennifer Hobbs or myself at (407) 894-7555.

Sincerely,

John White
Environmental Supervisor
Hazardous Waste Program

JW/jh

MALATINO & ASSOCIATES, INC.

October 8, 1993

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

RE: Antifreeze Testing

Dear Mr. Allen:

The firm of ***Malatino & Associates, Inc.*** of Lakeland (Polk County), Florida has recently completed testing on waste antifreeze samples collected throughout West Central Florida. The sampling methodology, testing procedures and certified analysis are shown attached to this letter report. Five different commercial facilities waste antifreeze were tested.

The five sites included in the composite sampling program were:

Jim Adams Ford	- Lakeland, North Central Polk County
B.M. Smith Chrysler	- Plant City, East Hillsborough County
Jiffy Lube	- Carrollwood, North Hillsborough County
Courtesy Pontiac	- West Tampa, West Hillsborough County
Ringhaver	- Gibsonton, South Hillsborough County

ATTACHMENT V

Approximately one liter of antifreeze was collected at each stop and placed in a 1 1/2 gallon glass amber bottle and placed on ice.

The samples were composited into this large bottle for certified testing.

The results of this certified analysis indicated non-hazardous waste per 40CFR Part 262, (the TCLP rule). Pesticides and herbicide analysis was not performed because of the unfeasibility of them appearing in waste antifreeze.

Please review our data, methodology and sampling procedures with any suggestions on future improvement. I look forward to hearing from you.

Sincerely,

Anthony M. (Tony) Malatino

Anthony M. (Tony) Malatino, President
Malatino & Associates, Inc.

Attachments: Sampling Methods and Procedures
Certified Analysis

xc: Rip Coleen - Oertel & Hoffman, P.A., Tallahassee, FL

AMM:fapl-ipcdep

SAMPLING METHODS

A one quart liquid waste antifreeze sample was extracted from drums and aboveground storage tanks utilizing a glass tube (Kawassa sampler) for a top to bottom of tank/drum depth composited sample.

The sample was then immediately placed in a 1 1/2 gallon amber glass bottle with a teflon line lid and sealed.

The bottle was kept in an ice chest and cooled with ice to 4°C.

A Chain of Custody form was completed by A.M. (Tony) Malatino who collected each sample personally with the assistance of his field technician, Mr. Edsel H. Surrency, Jr. of ***Malatino & Associates, Inc.***.

The glass bottle containing the five composited sample sites was then taken to Advanced Separation Technologies Laboratory of Lakeland, Florida, which had its sister (Florida Power Co.) laboratory, Progress Environmental Laboratory analyze the samples.

LABORATORY METHODOLOGIES

The antifreeze water sample was analyzed at Progress Environmental Laboratory (State HRS Number E84207 and FDEP CompQAP Number 900306G).

The sample was analyzed for EPA Method 1311, TCLP for organics and metals and EPA Methods 8010, 8270, 6010, and 245.2.

ADVANCED SEPARATION
TECHNOLOGIES INCORPORATED™

5315 Great Oak Drive
Lakeland, Florida 33801
Phone: (813) 687-4460
Fax: (813) 687-9362

- CERTIFICATE OF ANALYSIS - PG. 1 OF 2

Subcontract (HRS # E84207 and FDER CompQap #900306G)

TO: International Petroleum Corp.
105 South Alexander St.
Plant City, FL 33566

Report Date: 10/05/93

AST LAB# : 2370
Client ID : IPC Antifreeze
Project ID : 12396
Location : IPC
Matrix : Liquid

Collection Information:
Sample Date: 9/20/93
Sample Time:
Sample By : TM

ND = Less than MDL
J = Detection suspected, but below quantitative limit
B = Found in Blank
NOTE: EPA Method 1311, TCLP

Lab#	Parameter	Method	Results	Units	MDL
2370	Vinyl Chloride	EPA 8010	ND	mg/l	0.0
2370	1,1-dichloroethene	EPA 8010	ND	mg/l	0.0
2370	Chloroform	EPA 8010	ND	mg/l	0.0
2370	Carbontetrachloride	EPA 8010	ND	mg/l	0.0
2370	1,2-Dichloroethene	EPA 8010	0.03	mg/l	0.0
2370	Trichloroethene	EPA 8010	ND	mg/l	0.0
2370	tetrachloroethene	EPA 8010	0.128	mg/l	0.0
2370	Benzene	EPA 8010	ND	mg/l	0.0
2370	Chlorobenzene	EPA 8010	ND	mg/l	0.00
2370	MEK	EPA 8010	0.07	mg/l	0.00
2370	Analysis Date for TCLP Volatiles	EPA 8010	10/04		0.00
2370	1,4-Dichlorobenzene	EPA 8270	ND	mg/l	0.12
2370	Hexachloroethane	EPA 8270	ND	mg/l	0.1
2370	Nitrobenzene	EPA 8270	ND	mg/l	0.0
2370	Hexachlorobutadiene	EPA 8270	ND	mg/l	0.1
2370	2,4,6-Trichlorophenol	EPA 8270	ND	mg/l	0.0
2370	2,4,5-Trichlorophenol	EPA 8270	ND	mg/l	0.0
2370	2,4-Dinitrotolulene	EPA 8270	ND	mg/l	0.0
2370	Hexachlorobenzene	EPA 8270	ND	mg/l	0.1
2370	Pentachlorophenol	EPA 8270	ND	mg/l	0.1
2370	Pyridine	EPA 8270	ND	mg/l	0.4
2370	2-Methylphenol	EPA 8270	ND	mg/l	0.0
2370	m-p-cresol	EPA 8270	J	mg/l	0.0
2370	Total Cresol	EPA 8270	J	mg/l	0.0
2370	Analysis Date for EPA Method 8270	EPA 8270	10/01		0.0

Respectfully submitted, Diane Dimmaco
Diane Dimmaco, Analytical Laboratory Supervisor

A SUBSIDIARY OF FLORIDA PROGRESS

RECEIVED OCT 07 1993

ADVANCED SEPARATION TECHNOLOGIES INCORPORATED™

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

CONTINUATION SHEET PG. 2 OF 2

TO: International Petroleum Corp.
105 South Alexander St.
Plant City, FL 33566

Report Date: 10/05/93

J = Detection suspected, but below quantitative limit
B = Found in Blank
EPA Method 1311, TCLP

Lab#	Parameter	Method	Results	Units	MDL
2370	Silver	EPA 6010	ND	mg/l	0.23
2370	Arsenic	EPA 6010	ND	mg/l	1.92
2370	Barium	EPA 6010	0.23	mg/l	0.11
2370	Cadmium	EPA 6010	0.16	mg/l	0.07
2370	Chromium	EPA 6010	ND	mg/l	0.09
2370	Mercury	EPA 245.2	ND	mg/l	0.00
2370	Lead	EPA 6010	3.07	mg/l	0.75
2370	Selenium	EPA 6010	ND	mg/l	1.00

Respectfully submitted, Diane DiMonaco
Diane DiMonaco, Analytical Laboratory Supervisor
(COA-IPC1.J05)

Florida Department of Environmental Regulation

Southwest District • 3804 Coconut Palm Dr. • Tampa, Florida 33619

Lawton Chiles, Governor 813-744-6100 Virginia Wetherell, Secretary

May 3, 1993

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

ATTN.: Garry Allen, President

RE: Warning Notice #WN93-0023HW29SWD
Appendix I

Dear Mr. Allen,

As per our conversation of May 3, 1993, apparently Appendix I was not included in the above referenced warning notice. Enclosed you will find said document. The Department apologizes for any confusion this deletion has created.

Should you require further assistance on this matter or any other matters, please call Kevin Bull at (813) 744-6100, extension 389.

Sincerely

Kevin Bull

Kevin Bull
Environmental Specialist I
Division of Waste Management

Enclosure

For Routing To Other Than The Addressee	
To:	Location:
To:	Location:
To:	Location:
From:	Date:

State of Florida
DEPARTMENT OF ENVIRONMENTAL REGULATION

Interoffice Memorandum

ENFORCEMENT/COMPLIANCE COVER MEMO

To: __X__ Rick Garrity, DDM
__X__ William Kutash, Env. Adm. WK 4/8/93
_____ OGC, ATTN:

From/Through:
William Kutash, Division Administrator
Elizabeth Knauss, Section Supervisor
KMB Kevin Bull, Environmental Specialist I

Date: April 5, 1993

File Name: International Petroleum Corporation **Case #:** HW05197
Program: Hazardous Waste **County:** Hillsborough

Type of Document:

Warning Notice __X__	Final Order	Case Report
NOV	Consent Order	Penalty Authorization __X__
Draft	Final	

Brief Description of Violation: International Petroleum Corp. is a used oil collector, transporter, and recycler that has not been determining if their waste is hazardous waste. At least 137 drums and 140,000 pounds has been shipped off in this fashion. Also, IPC discharged used oil to a run-off area adjacent to the used oil transport vehicle parking zone.

Summary of Corrective Actions: Determine if waste is hazardous waste prior to shipment, and retain documents pertaining to such determination. Perform a PCAP to determine the extent of contamination by used oil

Penalty Summary:
Extent of Deviation: Major Potential for Harm: Moderate
Modifiers: Adjustment for passive economic benefit
Penalty Amount: $40,184.00 Costs and Expenses: $100.00

Total Penalty Amount: $40,284.00 Approved by Secretary:_____

Florida Department of Environmental Regulation

Southwest District • 3804 Coconut Palm • Tampa, Florida 33619

Lawton Chiles, Governor 813-744-6100 ~~Carol M. Browner~~, Secretary

Virginia B. Wetherell

DATE: 5/18/93

TIME: 10:00

SUBJECT: IPC

A T T E N D E E S

Name	Affiliation	Telephone
BETH KWAJSS	FDER	813-744-6100 x 383
Edward Clark	Clark Engineers-Scientists	(305) 233-1411
GARRY R. ALLEN	I.P.C.	813 754 1504
R.P Caleen	Central/Hoffman	(904) 877-0099
FRANK SABETTI	IPC	(813) 754-1504
Jim Clarke	Clark Environmental	813-425-4884

TPA-02
02/93

Florida Department of
Environmental Protection

Lawton Chiles
Governor

Southwest District
3804 Coconut Palm Drive
Tampa, Florida 33619
813-744-6100

Virginia B. Wetherell
Secretary

FEB 14 1994

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

Dear Mr. Allen:

The Department is in receipt of your "Final Report; Waste Characterization Program" document, dated January 27, 1994. The analyses from the series of sampling events from your combined sump and filter basket lint sludge indicate that it is not a hazardous waste and is not regulated under RCRA. Furthermore, sampling results presented in your "Summary Report; Waste Characterization Program", dated October 4, 1993, indicate that the area of suspected oil stained soils is not excessively contaminated.

We appreciate the efforts that you have taken to ensure that you are in compliance. We suggest that you continue TCLP testing of the sludge on an annual basis, as your customers and the nature of their waste streams may change over time.

Based on the results of your analyses, the Department is hereby closing Warning Notice #WN93-0023HW29SWD.

Sincerely,

William Kutash
Waste Program Administrator

xc: Compliance File
Enforcement File

TJR/tjr

Waste

State of Florida
Department of Environmental Regulation

District Routing Slip

To: Rick Garrity Date: 4-28-93

C.C. To:

	Pensacola	**Northwest District**	
	Panama City	Northwest District Branch Office	
	Tallahassee	Northwest District Branch Office	
	Apalachicola	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 ☐ Reply Required ☐ Info Only ☐
Date Due _____ Date Due _____

Comments:

D.E.R.
APR 30 1993
SOUTHWEST DISTRICT
TAMPA

From: Larry Morgan Tel: SC 278-9730

10-31-90

State of Florida
DEPARTMENT OF ENVIRONMENTAL REGULATION

For Routing To Other Than The Addressee

To: _____ Location: _____
To: _____ Location: _____
To: _____ Location: _____
From: _____ Date: _____

Interoffice Memorandum

TO: Virginia B. Wetherell, Secretary

THROUGH: Dan Thompson, General Counsel

FROM: Larry Morgan, Deputy General Counsel

SUBJECT: Legal Sufficiency Review of ~~Civil Penalty~~ Authorization Memo International Petroleum Corp.

DATE: 4/22/93

✓ 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: _____

PENALTY AUTHORIZATION REQUEST
SOUTHWEST FLORIDA DISTRICT

Investigator: Kevin Bull
Date Submitted: April 5, 1993

1. VIOLATOR: International Petroleum Corporation

2. LOCATION OF VIOLATION: 105 South Alexander Street
Plant City, FL 33566

3. NATURE OF VIOLATION:

International Petroleum Corporation (IPC), a wholly owned subsidiary of International Recovery Corporation, recycles used oil and associated petroleum-contaminated materials including used oil filters, used antifreeze, and contaminated waste water.

As a result of an inspection conducted on February 10 and 11, 1993, the following violations were cited in a Warning Letter to the facility:

40 CFR 262.11 Failure of a person who generates a solid waste, as defined in 40 CFR 261.2, to determine if that waste is hazardous waste. Hazardous waste determinations were not conducted for sludge from pump basket-filters in tank field, or oil and soil sent for disposal.

403.751(1)(b), F.S. Discharge of used oil into sewers, drainage systems, septic tanks, surface or ground waters, watercourses, or marine waters. Such a discharge has occurred in the area adjacent to the used oil transport vehicle parking zone as the result of run-off from the parking zone.

4. PENALTY RATIONALE:

The following is an evaluation of the assessed civil penalty of $40,184.00 for non-compliance with RCRA and solid waste requirements prepared in accordance with EPA and Department penalty policies. This figure was derived as follows:

I) 40 CFR 262.11 - Failure to determine if waste generated is hazardous waste. Hazardous waste determination for 18 out of 20 shipments of combined basket-filter and sump sludge, oil for disposal, and soil were not performed. Hazardous waste determination for other two shipments was not sufficient to determine if waste was hazardous waste.

A "Moderate Potential for Harm" was chosen using FDER's "RCRA RANKING SYSTEM FOR POTENTIAL FOR HARM".

NATURE OF WASTE: Category 2 was chosen for a SCORE of 4, because the waste does not meet the criteria for Category 1. For much of the waste being considered, the nature is largely unknown.
VOLUME OF WASTE: A SCORE of 8 was chosen because there were more than 26 drums for which a waste determination was not conducted.
RECEPTORS: Discharge/Potential for discharge was chosen since this waste has been treated and disposed, for a SCORE OF 4. Also, the potential for exposure of 10 - 100 people for a SCORE of 2.
TOTAL SCORE: 18

A "Major Deviation from the Rule" was chosen per FDER's "GUIDELINES FOR CHARACTERIZING RCRA VIOLATIONS" because the percentage of the facility's waste stream for which a waste determination has not been conducted exceeds 75%.

Penalty Range: $8,000 - $10,999
Penalty Chosen: $9,500

An "Adjustment" pertaining to "Economic benefit of non-compliance" of $26,784.00 was chosen per FDER's "SETTLEMENT GUIDELINES FOR CIVIL PENALTIES" and "ESTIMATED PRICES FOR USE WHEN CALCULATING ECONOMIC BENEFIT' since, by failing to perform the hazardous waste determination for 18 shipments of waste, a passive economic benefit was realized. The current average laboratory costs associated with a hazardous waste characterization is approximately $2400.00 per sample, according to FDER estimates. Economic benefit is calculated according to the following formula:

EB = AC (1 - T) + DC (I)
EB = ($2,400) (18) (1- 0.38) + ($0)(0.10)
EB = $26,784.00

II)403.751(1)(b) Discharge of used oil into the area adjacent to the used oil transport vehicle parking zone, as the result of run-off from the parking zone.

A "Moderate Potential for Harm" was chosen using FDER's "GUIDELINES FOR CHARACTERIZING SOLID WASTE VIOLATIONS", since it is estimated that the discharge of used oil was between 25 and 1000 gallons.

A "Major Deviation from the Rule" was chosen using FDER's "GUIDELINES FOR CHARACTERIZING SOLID WASTE VIOLATIONS", since it is estimated that the discharge of used oil was greater than 55 gallons.

Penalty Range: $3,200 - $4,599
Penalty Chosen: $3,900

5. PENALTY RECOMMENDATION:

I recommend that International Petroleum Corporation be required through a Consent Order to pay up to $40,184.00 in civil penalties as calculated on the attached penalty worksheet.

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

4/16/93 Approved

Disapproved

Virginia B. Wetherell, Secretary

4-27-93
Date

Comments:

cc: Larry Morgan, OGC
Satish Kastury, BWP&R
Don Trussell, BWP&R

PENALTY COMPUTATION WORKSHEET

Violator's Name : International Petroleum Corporation

Identify Violator's Facility : 105 South Alexander Street
Plant City, FL 33566

Date : April 5, 1993

PART I - Class B (no penalty) Determination

Rationale for Class B determination : _____

_____

PART II - Class A Penalty Determinations

#	Violation Type	Potential for Harm	Extent of Deviation	Matrix Amount	Multi-Day	Adjustment	Total
1	40 CFR 262.11	moderate	major	$9,500		$26,784	$36,284
2	403.751 (1)(b) FS	moderate	major	$3,900			$3,900

Total Penalties for all Violations : $40,184

(Attach Part III for each violation for which an adjustment on multi-day penalty is determined)

PENALTY COMPUTATION WORKSHEET

PART III - Multi-day Penalties and Adjustments

ADJUSTMENTS DOLLAR AMOUNT

Good faith/Lack of good faith prior to discovery : N/A

Justification :

Good faith/Lack of good faith after discovery : N/A

Justification :

History of non-compliance : N/A

Justification :

Economic benefit of non-compliance : $26,784

Justification : According to documents obtained by Department, IPC has not determined if waste generated is hazardous waste for 18 of 20 shipments. See attached documentation for calculation of economic benefit.

Ability to pay : N/A

Justification :

Total Adjustments : $26,784

MULTI_DAY PENALTIES DOLLAR AMOUNT

Number of days adjustment factor(s) to be applied : N/A

Justification :

OR

Number of days matrix amount is to be multiplied : N/A

Justification :

PENALTY COMPUTATION WORKSHEET

PART IV - Other Adjustments Made After Meeting with the Responsible Party

ADJUSTMENTS	DOLLAR AMOUNT
Relative merits of the case :	
Resource considerations :	
Other justification :	

RANKING SYSTEM FOR POTENTIAL OF HARM

FACILITY NAME : International Petroleum Corporation

RULE(S) VIOLATED : 40 CFR 262.11 A person who generates a solid waste as defined in 40 CFR 262.2, must determine if that waste is hazardous waste. Such a determination had not occurred for 18 of 20 shipments of waste from IPC to Clark Environmental, and was incomplete for two of the 20 shipments.

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 + 2 = 6

Discharge/
Potential = 4
No Potential = 1

> 1000 people = 4
100 - 1000 people = 3
10 - 99 people = 2
< 10 people = 1

TOTAL SCORE : 18

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

ASSIGNED BY : Kevin Sull DATE : 4-5-93

ECONOMIC BENEFIT CALCULATION

General
EB = AC (1 - T) + DC (I)

where
EB = economic benefit
AC = avoided costs (*i.e.*, expenditures nullified by violator's failure to comply)
T = corporate tax rate (given T = 38%)
DC = delayed costs (*i.e.*, expenditured deferred by violator's failure to comply)
I = interest rate charged by IRS for deliquent accounts (given I = 10%)

Specific
Location : International Petroleum Corporation

Violation : 40 CFR 262.11

	Avoided Costs	Delayed Costs
Total TCLP analysis	$2400 X 18 (shipments)	
Total	$43,200.00	

per "Estimated Prices For Use When Calculating Economic Benefit"

AC = $43,200.00
T = 0.38
DC = $0
I = 0.10

EB = AC (1 - T) + DC (I)
EB = ($43,200.00) (1 - 0.38) + ($.00) (0.10)
= $26,784.00

4-5-93

Florida Department of Environmental Regulation

Southwest District • 3804 Coconut Palm • Tampa, Florida 33619

Lawton Chiles, Governor 813-744-6100 Virginia B. Wetherell, Secretary

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

APR 19 1993

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

ATTN.:Mr. Garry Allen

WARNING NOTICE #WN93-0023HW29SWD
FLD 065 680 613

RE: International Petroleum Corporation
Used oil management

Dear Mr. Allen,

A hazardous waste compliance inspection was conducted at your facility on February 10 and 11, 1993. This inspection was conducted under the authority of Section 403.091, Florida Statutes, and Chapter 403, Part IV, Florida Statutes, in order to determine the compliance status of your facility with Title 40 Code of Federal Regulations Parts 260 through 268, as adopted in Florida Administrative Code Chapter 17-730.

During this inspection, possible violations of rules regarding hazardous waste management were noted. These possible violations are described in the "Summary of Violations" section of the attached inspection report.

You are advised that any activity at your facility that may be contributing to violations of the above described statutes and rules should be ceased immediately. Operation of a facility in violation of state statutes or rules may result in liability for damages and restoration, and the judicial imposition of civil penalties up to $50,000 per violation per day pursuant to Section 403.727, Florida Statutes.

International Petroleum Corporation
Warning Notice #WN93-0023HW29SWD

APR 19 1993

You are requested to contact Kevin Bull of this office at (813)-744-6100 (ext. 389) within 10 calendar days of receipt of this Warning Notice to arrange a meeting with Department personnel to discuss the issues raised in this Warning Notice. You may wish to consult an attorney and to have the attorney attend the meeting with the Department.

PLEASE BE ADVISED that this Warning Notice is part of an agency investigation preliminary to agency action in accordance with Section 120.57(4), Florida Statutes. The purpose of this letter is to advise you of potential violations and to set up a meeting to discuss possible resolutions to any potential violations that may have occurred for which you may be responsible. Under the Department's agreement with the United States Environmental Protection Agency (EPA), a formal administrative complaint or "Notice of Violation" (NOV) must be issued within 120 days of the date of the attached inspection report. The issuance of the NOV may be avoided through the entry of a consent order or a demonstration that the listed violations did not occur. If the Department issues a Notice of Violation, and you are named as a party, you will be informed of your rights to contest any determination made by the Department in the Notice of Violation.

If after further investigation, the Department determines that the violation occurred, this matter may be resolved through the entry of a "Consent Order" which will include a compliance schedule and an appropriate penalty.

Sincerely

for Richard Garrity
Director of District Management
Southwest District

RDG/kmb

Enclosure

cc: Satish Kastury, BWP&R
Don Trussell, BWP&R
Alan Farmer, USEPA, Region IV
Compliance File

Florida Department of Environmental Regulation

Southwest District • 3804 Coconut Palm Dr. • Tampa, Florida 33619

Lawton Chiles, Governor 813-744-6100 Virginia Wetherell, Secretary

HAZARDOUS WASTE INSPECTION REPORT

1. INSPECTION REPORT____COMPLAINT__X__ROUTINE____FOLLOW-UP____PERMITTING

FACILITY NAME International Petroleum Corporation DER/EPA ID # FLD 065 680 613

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

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

COUNTY Hillsborough PHONE (813) 754-1504 DATE 02-10-93/02-11-93 TIME 1030-1215/1200-1330 hours

TYPE OF FACILITY:

Generator
_____Generator (>1000 kg/month)
_____SQG (100-1000 kg/month)
_____CESQG (<100 kg/month)

Transporter
_____Transporter
_____Transfer Facility
_____Non-Handler

Storage
_____Container
_____Tank
_____Waste Pile
_____Surface Impoundment

Disposal
_____Landfill
_____Surface Impoundment
_____Waste Pile

Treatment
_____Tank
_____Land Treatment
_____Thermal
_____Chem/Phys/Bio
_____Incinerator
_____Surface Impound.

__X__Used Oil Marketer

2. Applicable Regulations:

_____40 CFR 261.5	____40 CFR 262	_____40 CFR 263	____40 CFR 264
_____40 CFR 265	__X__40 CFR 266	_____40 CFR 268	__X__17-710 FAC

3. Responsible Official:

Garry R. Allen - President

4. Survey Participants and Principal Inspector:

Garry R. Allen - President; Frank Shibetti - Vice-President; Tony Malatino - Consultant
Kevin Bull - FDER
Jeff Schoenbacher - FDER

5. Facility Latitude: 28° 00' 30" Longitude: 82° 08' 00"

6. Type of Ownership: FEDERAL STATE COUNTY MUNICIPAL PRIVATE

7. Permit No.:_____ Date Issued:_____ Exp. Date:_____

8. Facility Description:

International Petroleum Corporation (IPC), a wholly owned subsidiary of International Recovery Corporation, recycles used oil and associated petroleum-contaminated materials including used oil filters, used antifreeze, and contaminated waste water. IPC, which currently employs 32 individuals and has seven trucks in operation, has been located at this 8.3 acre since 1980.

The summary of the solid waste of significance generated by IPC is contained in the table below.

Process	Significant Solid Waste	EPA Haz. Waste No.	Quantity	Disposition	Exclusion/ Exemption
Used oil distillation	Re-refined oil	N/A	Undeter-mined	Various	261.6(a)(2)
Oil-contam. water distill.	Waste water	N/A	25,000-50,00 per mo.	Plant City POTW	261.4(a)(2)
Oil filter crusher	Scrap metal	N/A	6,000 - 8,000 lbs. per mo.	Bayou Steel	261.6(a)(3)
Used anti-freeze distill.	Used antifreeze	N/A	1,000 gallons per month	Plant City POTW	Non-haz.
Tank field pump filters	Sludge	Note 1	See text	Clark Enviro mental	Note 1

Note 1 - Laboratory analysis were unavailable at the time of inspection. Subsequent laboratory analysis by Department confirmed that pump basket-filter sludge is non-hazardous.

IPC collects used oil from across the State of Florida and re-refines the oil in a distillation process. IPC is permitted under Chapter 17-710, F.A.C., to transport, collect, and recycle used oil under certification number 50005-UO. According to Mr. Garry Allen, the total halogen content of a used oil shipment, picked up by IPC, is indicated by a "halogen sniffer" (Model HLD 440) at the time the shipment is accepted by the driver. Also, for all shipments of used oil, regardless of whether they are hauled by IPC vehicles or other haulers, a hazardous waste determination is performed prior to pumping a vehicle's contents to the IPC tank farm. According to the examined documents, the laboratory work for IPC is performed by International Environmental Services, a laboratory that shares the site with IPC, and which is also a subsidiary of International Recovery Corporation. Laboratory results for used oil incoming to IPC were examined, and these documents apparently indicate that no off-specification oil is accepted by IPC.

According to company literature, the distillation process used by IPC occurs in two stages: first is an atmospheric distillation process; and secondly is a vacuum distillation process. Light fuels recovered from the distillation process are used as a fuel at the facility, while any water is discharged to the facility waste waster treatment unit (WWTU). The on-specification oil, which is the result of the distillation process and which, according to Mr. Allen, is a #5 fuel oil, is then marketed largely to asphalt plants and the phosphate

industry. Laboratory results for recycled oil processed by IPC were examined, and indicate that all recycled oil is on-specification.

IPC also collects waste water that is contaminated with oil and passes this material through the distillation process. According to Mr. Frank Shibetti, approximately 25,000 to 50,000 gallons per month are processed in this manner. All waters passing through the WWTU are discharged to the City of Plant City POTW under permit #1993-20. Laboratory results were examined pertaining to processed waste water indicating no discrepancies with the pretreatment permit.

According to company literature, 55-gallon drums are supplied by IPC to its clients for the collection of used oil filters. IPC collects both oil filters that have been crushed by their clients or uncrushed oil filters. The uncrushed oil filters, upon collection by IPC, are returned to the Plant City site wherein they are crushed and drained. According to Mr. Shibetti, after approximately 48,000 pounds of crushed oil filters are collected in 55-gallon drums, which takes approximately six to eight weeks, they are sold to Bayou Steel in Laplace, LA. According to Mr. Shibetti, Bayou Steel uses the crushed oil filters to manufacture #5 reinforcement bars for the construction industry.

Used anti-freeze is also accepted by IPC, according to Mr. Allen, wherein this material undergoes the same distillation process as that for used oil. Prior to accepting the used antifreeze, however, IPC tests the ethylene glycol for (or requires results of an independent laboratory for) TCLP lead content. Approximately 1000 gallons per month is reclaimed through the distillation process. Upon processing, the recycled antifreeze is then discharged to the WWTU prior to final disposition to the City of Plant City POTW.

The tank field of IPC consists of steel above-ground and on-the-ground tanks. The total tank capacity of the tank field is approximately 1,200,000 gallons in the 16 tanks that are used to store used and re-refined oil. Also within the tank field are tanks to store oil-contaminated water with a capacity of approximately 100,000 gallons between the two tanks. According to Mr. Allen and Mr. Shibetti, the tanks have not been cleaned out since being brought into operation. Secondary containment of the tank field was found to be in adequate condition. Liquid collected in the sumps within secondary containment is pumped directly to the contaminated water tanks. When sludge is cleaned out of the sumps by IPC personnel it is placed in one of two five-gallon pails located near the tank field, according to Mr. Shibetti and Mr. Allen. Pumps in the tank field area, which pump used oil through the tank system, have basket filters on their supply side (see Photo #1). According to Mr. Shibetti and Mr. Allen, these basket filters are emptied every couple of days into the same five-gallon pails in which the sump sludge is placed (see Photo #2). The pails are then emptied into 55-gallon drums. According to Mr. Shibetti and Mr. Allen, approximately nine 55-gallon drums in a three-month period of this material is accumulated prior to off-site transportation to Clark Environmental, Inc. in Mulberry, FL. No analytical results were immediately available on the nature of this material, although Mr. Tony Malatino said that this information was available from the laboratory document storage area. These documents were never received from Mr. Malatino.

An examination of the parking area for the used oil transportation vehicles indicated that spillage of oil has occurred in this area. As the parking area slopes to the east, and containment of this area is not continuous around the parking area, run-off carries oil spillage outside the parking area. According to Mr. Malatino, every one to two hours an IPC employee examines the parking area for spillage, and, upon finding such, uses absorbent rags to clean-up the spilled oil. Soil and rock in the run-off area adjacent to the parking area (see Photo #3) were found to be stained with an iridescent material (see Photo #4). According to Mr.

Malatino, the staining observed outside the containment area is the result of the recent resurfacing of the parking area.

Department investigators were then escorted to the oil filter crushing area where Mr. Shibetti gave a demonstration of the crushing process. In this same area is a parts washer that uses a water-based cleaner manufactured by Sea-Wash. An examination of the company literature for the Sea-Wash detergent indicates that the detergent is non-hazardous. According to Mr. Shibetti, the parts washer is used infrequently, and as such, detergent and water are added as needed. The parts washer, according to Mr. Shibetti, has not required servicing (draining and cleaning) to this point in time.

On February 11, 1993, Department investigators returned to IPC to obtain samples of the sludge, which is a combination of sump waste and pump filter basket waste, from the five gallon pails situated in the tank field. Four samples in all were taken--two samples were retained by Mr. Malatino for, according to Mr. Malatino, submission to International Environmental Services, while the other two samples were retained by the Department for submission to the Department's Tallahassee laboratory for analysis of TCLP metals, volatiles, and semi-volatiles. On March 31, 1993, the final analytical report was received from the Department's Tallahassee laboratory, and the results for TCLP metals, volatiles, and semi-volatiles indicated that no maximum allowable concentrations, as per 40 CFR 261.24, were exceeded.

Also, on February 11, 1993, Department investigators went to Clark Environmental, Inc (CEI), in Mulberry, FL, which, according to Mr. Shibetti and Mr. Allen, is the point of disposition for non-hazardous waste from IPC. Mrs. Beth Clark, the Registered Agent of CEI, retrieved the file pertaining to IPC. According to CEI documents, from August 8, 1991 through to December 10, 1992 CEI accepted 137 drums (55-gallon) and 140,000 pounds (in tanker trucks) of material that is identified either as "sludge", "non-hazardous", "soil", or "non-regulated". According to these documents, there have been a total of 20 shipments of waste from IPC in this 16-month period, however analytical results for only two shipments were found in CEI files. According to Mr. Allen and Mr. Shibetti, this material is the sludge, which is a combined sump waste and pump filter-basket waste. Large shipments of this material are the result of a general house-keeping at IPC, according to Mr. Shibetti and Mr. Allen. Following is a description of the analytical results for the two shipments that were shipped from IPC to CEI for which there is available data.

According to the documents obtained from CEI, 27 drums of "non-regulated" waste was shipped from IPC to CEI, on August 19, 1991. According to laboratory results, on International Environmental Services letterhead, this shipment consisted of 13 drums of oil and 14 drums of soil. Concentrations for total cadmium, chromium, lead, and organic halogens, and TCLP lead were determined for a composite oil sample. Analysis of the composite sample of the oil indicates that the total lead content for the composite was 200 mg/kg, in excess of the used oil specification in 40 CFR 266.40. Total halogens for this composite sample were 223 mg/kg. According to 40 CFR 266.41, a person may market off-specification used oil for energy recovery only to burners and other marketers who have notified EPA of their used oil management activities. According to Department documents, however, CEI is not a burner or a marketer of used oil, and therefore it must be presumed that shipment of the oil to CEI was for the purpose of disposal. For the purposes of disposal, the analytical data outlined above is insufficient to determine if that waste (used oil) is hazardous waste. Prior to disposal of the used oil, it should have been determined if this waste was hazardous waste by measuring all TCLP contaminants, ignitability, corrosivity, and reactivity.

A composite sample of the soil in this same shipment was, according to laboratory documents of International Environmental Services, analyzed for total volatile organic aromatics, total recoverable petroleum hydrocarbons, arsenic, barium, cadmium, chromium, lead, mercury, selenium, silver, TCLP benzene and lead, and total halogens. As the total arsenic concentration of the soil composite approached the maximum concentration allowed under 17-775 F.A.C. (total arsenic for soil = 54.4 mg/L; maximum concentration = 55 mg/L), the soil is suspect of containing a hazardous waste, and thus should have been screened for other contaminants as per 17-775.410(4) F.A.C.

On January 31, 1992, six drums of soil were shipped from IPC to CEI, according to documents obtained from CEI. According to these documents, the only analytical data available was for TCLP tetrachloroethylene. Although this soil does not exceed the maximum concentration for TCLP tetrachloethylene, this was not sufficient analysis to determine if that waste was hazardous waste. Prior to disposal, it should have been determined if the six drums of soil were hazardous waste by measuring all TCLP contaminants, ignitability, corrosivity, and reactivity.

9. Summary of 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 hazardous waste. Such a determination had not occurred for 18 of 20 shipments of waste from International Petroleum Corporation to Clark Environmental, Inc., and was incomplete for two of the 20 shipments.

403.751(1)(b), F.S. No person may discharge used oil into sewers, drainage systems, septic tanks, surface or ground waters, watercourses, or marine waters. Discharge of oil-contaminated run-off has occurred at International Petroleum Corporation in the area next to the used oil transport vehicle parking zone.

10. Corrective Actions:

40 CFR 262.11 International Petroleum Corporation shall immediately cease disposing of waste associated with used oil storage or distillation, or contaminated materials, without first performing a hazardous waste determination. This does not include oil filters, but does include, but is not limited to, sludge from sumps, sludge from pump basket-filters, sludge from distillation process, sludge from tank clean-out, used oil (which is not to be recycled), and contaminated soils and waters. Sampling and hazardous waste determination shall be in accordance with appropriate regulations. All reports shall be made available for perusal at International Petroleum Corporation, and retained in accordance with the appropriate regulations.

403.751(1)(b), F.S. International Petroleum Corporation shall cease to discharge used oil to the run-off area adjacent to the used oil transport vehicle parking area. International Petroleum Corporation shall prepare and submit to the Department a Preliminary Contamination Assessment Plan (PCAP) to determine the extent of contamination of the soil, sediment, surface water or groundwater in the run-off area adjacent to the used oil transport vehicle parking zone. The PCAP shall be performed in accordance with Appendix I to this report. Further action may be required by the Department upon assessment of the Preliminary Contamination Assessment Report (PCAR).

International Petroleum Corporation
FLD 065 680 613

Report Prepared By: Kevin Bull — Date: 3-31-93

Kevin Bull
Environmental Specialist I

Approved By: Elizabeth Knauss — Date: 3/31/93

Elizabeth Knauss
Environmental Supervisor I

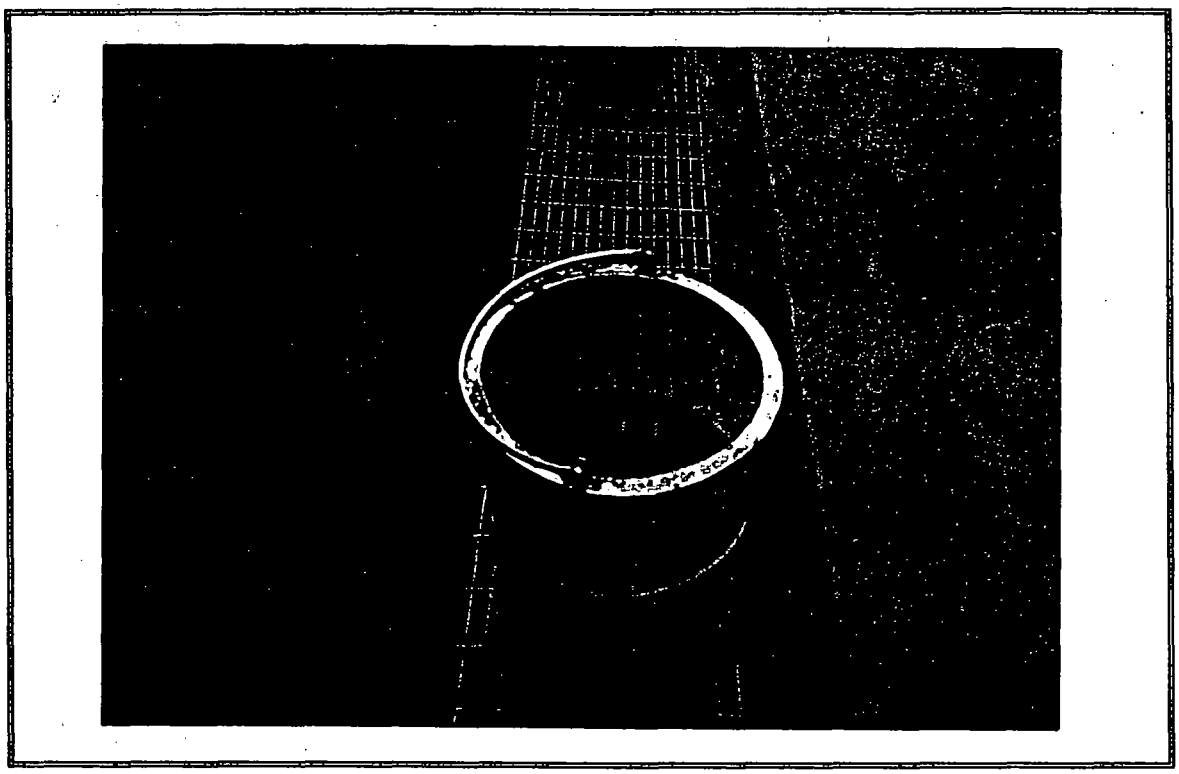


Photo #1 - Pump basket-filter

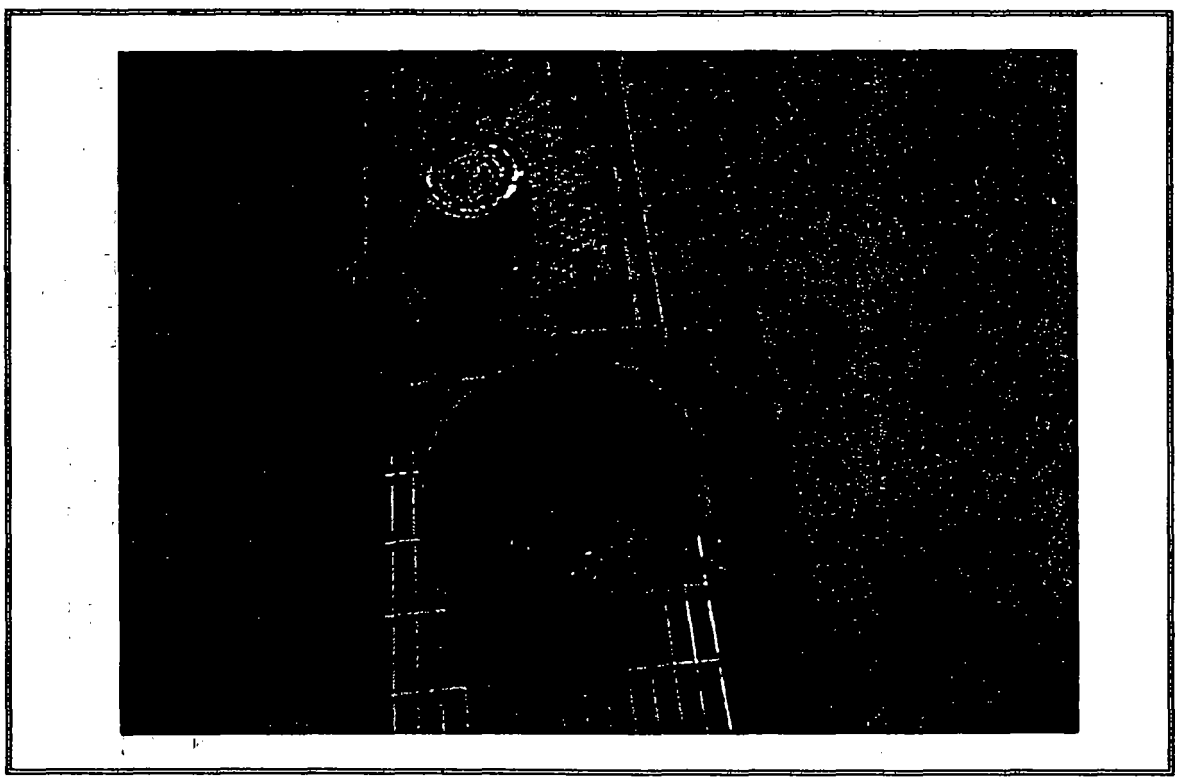


Photo #2 - Combined sludge from sump and pump basket-filters

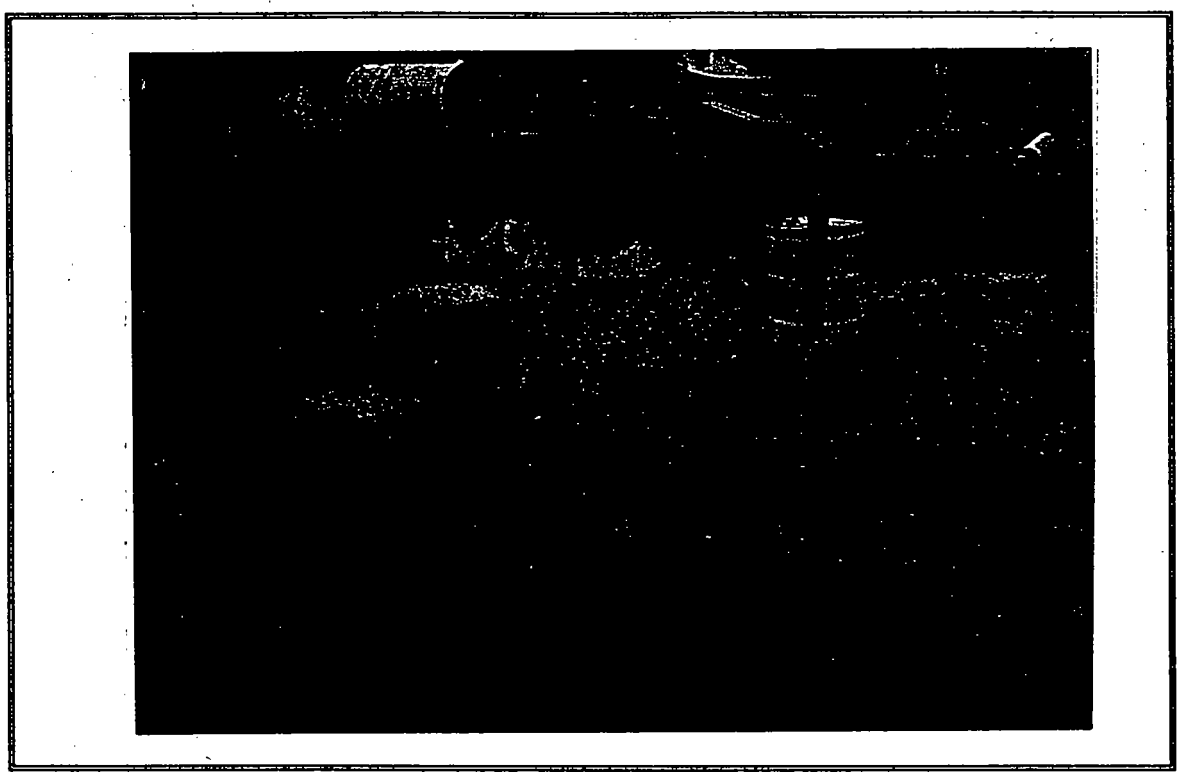


Photo #3 - Run-off area adjacent to used oil transport vehicle parking zone

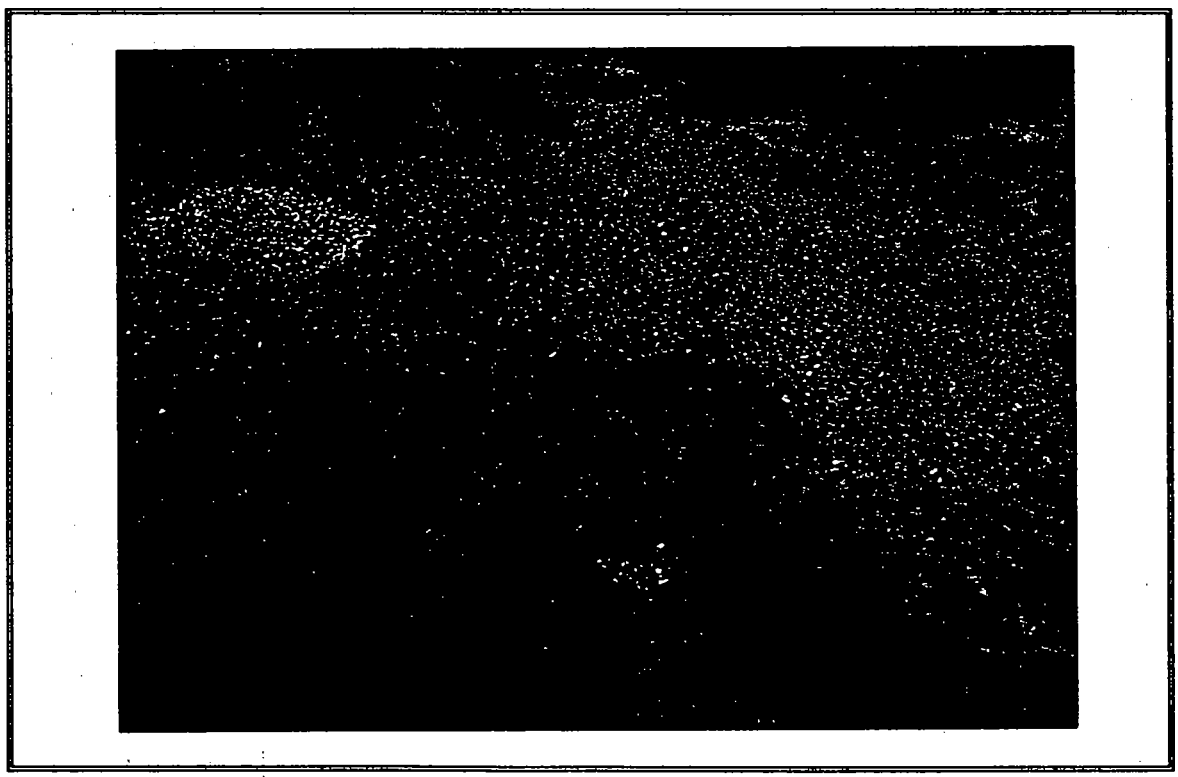


Photo #4 - Visual staining of run-off area

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

April 22, 1992

Mr. Satish Kastury
Environmental Administrator
Hazardous Waste Regulation Section
Department of Environmental Regulation
Twin Towers Office Building
2600 Blair Stone Road
Tallahassee, FL 32399-2400

RE: FLD982121592

Dear Mr. Kastury:

Sparkle Corporation is presently evaluating the concept of picking up waste ethylene glycol from automotive repair facilities as an additional service for our various parts washer customers. Prior to initiating the procedures listed below, we are requesting the Department's concurrence with these methods in writing to ensure our company is in compliance with 17-730 FAC particularly in regard to Florida's adoption of the Toxicity Characteristic Rule.

(1) Sparkle Corporation will initially notify its prospective waste ethylene glycol customers in writing that analytical testing for RCRA characterization and profile completion will be necessary prior to pickup. This will require a minimum of four consecutive quarters of analytical testing for Toxicity Characteristic or Total Lead (or other constituents if contamination is suspected) or upon collection of greater than 100 kg. of ethylene glycol. According to the Southwest and Central FDER Districts, this particular testing procedure as outlined in the enclosed February 2, 1988 Department memo is still apparently required.

Requires TC metals
TC Lead
TC Cadmium
TC Chromium

(2) Upon completion of the analytical testing, Sparkle Corporation will manifest the customer's waste ethylene glycol using EPA Waste Number D008 (or any other TC constituents that are exhibited) if it is determined that lead contamination will likely occur consistently from this particular generator. If analytical testing

P.O. Box 25456 • Tampa, Florida 33622-5456 • Phone (813) 626-4099

performed by the generator determines that Toxicity Characteristic constituents above the regulatory level were not consistently exhibited, then this material will be transported using a non-hazardous waste manifest to an authorized industrial wastewater treatment facility.

(3) Both hazardous and non-hazardous waste ethylene glycol will be picked up from generators within Florida and stored at our Company's three transfer facilities for less than 10 days. These containers would then be transported via company tractor trailer to Sparkle Corporation's permitted TSD facility in Tampa (H029-167443). Containers of both hazardous and non-hazardous waste ethylene glycol would be stored in an unpermitted container storage area within the facility for an additional 7-8 day storage until shipped out for treatment to another designated facility. This container storage area has already been provided with secondary containment and no commingling with the other hazardous wastes outlined in our operating permit would occur. A manifest continuation sheet would be utilized in addition to the original manifest to track the movement of these containers while being transported to an FDER approved treatment facility.

(4) The designated facility will then sign off upon acceptance of this waste and return the appropriate hazardous or non-hazardous manifest to the original generator for their records.

If you should have any questions or require additional information, please contact me at (813) 626-4099.

Sincerely,

Kim W. Biser

Kim W. Biser
Vice President Environmental
Compliance/Health/Safety

KWB/lb

Florida Department of Environmental Regulation
Twin Towers Office Bldg. • 2600 Blair Stone Road • Tallahassee, Florida 32399-2400
Lawton Chiles, Governor
Carol M. Browner, Secretary

July 9, 1992

Mr. Kim Biser, Vice President
Environmental Compliance/Health/Safety
Sparkle Corporation
Post Office Box 25456
Tampa, Florida 33622-5456

RE: FLD982121592

Dear Mr. Biser:

We have evaluated your antifreeze (waste ethylene glycol) disposal proposal and have the following comments concerning your proposed procedures for the analysis, management and disposal of the material.

Lead is not the sole constituent of concern in our experience with this waste stream. Therefore, the waste analysis plan should be for all TØC constituents (organics and metals) except pesticides. Total lead is of no value to the determination of hazardous waste characteristics and should be dropped as a concept for regulatory compliance purposes.

The concept of four quarterly samples to establish a baseline profile is acceptable so long as retesting is done upon process changes to establish a new four (4) quarter baseline.

Manifesting should be done on the basis of the outcome of the TC waste analysis profile. The use of a manifest for non-hazardous waste is at the generator's discretion but is an acceptable alternative to the State. An LDR notification form must accompany each load of manifested waste subject to the Land Disposal Restriction to avoid an enforcement action by Region IV, US EPA.

The transfer facilities involved in this program must amend the notifications required by Rule 17-730.171, F.A.C., (Form number(-8700-12) to include the waste anti-freeze (ethylene glycol solution). The TSD facility (HO29-167443) must submit a permit modification request to manage the waste antifreeze solution as waste stream as per Rules 17-730.290(1)(c) & (d) F.A.C., "Permit Modifications," which states that," ... good cause [for permit modifications] shall include, but not be limited to, the following:

(1)

(c) There are alterations in the facility after permit issuance which justify different permit conditions but do not require a construction permit.

(d) The causes set forth in 40 CFR 270.41 and 270.42.

40 CFR 270.42 includes-Appendix I, "Classification of Permit Modification." This proposal is a class 2 permit modification, pursuant to

Section F. Containers

3. Storage of different Wastes in containers, except as provided in (F) (4) below:
...b: That do not require additional or different management practices from those authorized in the permit.

The Department considers different or additional wastes brought on site for management practices of any kind to be subject to the facility's permit conditions in effect at that time. Therefore, in order for your proposal to comply with the RCRA regulations, you must seek and obtain a Class II permit modification before managing, at a permitted facility, any ethylene glycol (antifreeze) solutions that are characterized as hazardous waste.

Sincerely,

Michael K. Bedig

for Satish Kastury, Administrator
Hazardous Waste Regulation

SK/MXRo

cc: Lynnn R. Milanian, DER/Tampa

Hills Cnty

FLORIDA DEPARTMENT OF ENVIRONMENTAL PROTECTION
CENTRAL LABORATORY
2600 BLAIR STONE ROAD
TALLAHASSEE, FLORIDA 32399-2400

CHEMICAL ANALYSIS REPORT

Request ID: RQ-93-AUG-30-25
Job ID: 93-SEP-01-10 Project: OTHER
Job Name: INTERNATIONAL PETROLEUM - Job created on 1-SEP
Date Received: 1-SEP-1993 Customer ID: SW-TAM-WSM
Authorized: 30-SEP-1993 By: Liang T. Lin

Submitted By: SW DIST. OFFICE (TAMPA) - WASTE MANAGEMEN
3804 Coconut Palm Drive
Tampa, Florida 33619

Attn: Kent Edwards

For Additional Information, Please Contact
G. William Coppenger, Ph.D.
Yuh-Hsu Pan, Ph.D.
Timothy W. Fitzpatrick
Liang-Tsair Lin, Ph.D.
Suncom 277-2571
(904) 487-2571

Preliminary Review Copy Date: 18-OCT-1993

Abbreviations & Storet Codes:

A - Value reported is the mean of two or more determinations
B - Results based on colony counts outside the acceptable range.
I - Value reported is less than the minimum quantitation limit, and greater than or equal to the minimum detection limit.
J - Estimated value
K - Actual value is known to be less than value given
L - Actual value is known to be greater than value given
N - Presumptive evidence of presence of material.
O - Sampled, but analysis lost or not performed.
Q - Sample held beyond normal holding time.
T - Value reported is less than the criterion of detection.
U - Material was analyzed for but not detected; The value reported is the minimum detection limit.

V - Analyte was detected in both sample and method blank.
Z - Colonies were too numerous to count (TNTC).

Sample ID: 61364/93-SEP-01-10-01 Matrix: S-OTHER
Location: INTERNATIONAL PETROLEUM
Field ID: FILTER BASKET
Collected: 30-AUG-1993 08:45 By: TANYA RICE
Authorized: 29-SEP-1993 By: Mei-Fang Shyu
Type: Grab Sample
Lab Comments:
DEP TEMP=1DC
Field Comments:
MATRIX=SLUDGE

Analysis ID: TCLP-VOC
Volatiles in TCLP ZHE extract by 5030-8260
Prepared: 9-SEP-1993 00:00 By: Kevin Everett
Analyzed: 14-SEP-1993 00:00 By: Jusheng Qi
Authorized: 24-SEP-1993 By: Jusheng Qi

Storet#	Analyte	Value	Units
	Benzene	9.6	ug/l
	Bromoform	2.5 U	ug/l
	Carbon tetrachloride	2.5 U	ug/l
	Chlorobenzene	2.5 U	ug/l
	Chloroform	2.5 U	ug/l
	1,2-Dichlorobenzene	5.0	ug/l
	1,3-Dichlorobenzene	2.5 U	ug/l
	1,4-Dichlorobenzene	2.5 U	ug/l
	Dibromochloromethane	2.5 U	ug/l
	1,1-Dichloroethane	2.5 U	ug/l
	1,2-Dichloroethane	2.5 U	ug/l
	1,1-Dichloroethene	2.5 U	ug/l
	1,2-Dichloropropane	2.5 U	ug/l
	Ethylbenzene	35	ug/l
	Methylene chloride	11	ug/l
	1,1,2,2-Tetrachloroethane	2.5 U	ug/l
	Tetrachloroethene	7.0	ug/l
	1,1,1-Trichloroethane	7.6	ug/l
	1,1,2-Trichloroethane	2.5 U	ug/l
	Trichloroethene	2.5 U	ug/l
	Toluene	89	ug/l
	Vinyl chloride	2.5 U	ug/l
	Xylenes	240	ug/l

Comments(1): Elevated detection limits due to sample matrix interference.
(2): Tentative identification: total purgeable petroleum hydrocaons=est. 920 ug/L.

********** END OF REPORT **********

FLORIDA DEPARTMENT OF ENVIRONMENTAL PROTECTION
CENTRAL LABORATORY
2600 BLAIR STONE ROAD
TALLAHASSEE, FLORIDA 32399-2400

CHEMICAL ANALYSIS REPORT

Request ID: RQ-93-AUG-30-25
Job ID: 93-SEP-01-06 Project: OTHER
Job Name: INTERNATIONAL PETROLEUM - Job created on 1-SEP
Date Received: 1-SEP-1993 Customer ID: SW-TAM-WSM
Authorized: 15-SEP-1993 By: Liang T. Lin

Submitted By: SW DIST. OFFICE (TAMPA) - WASTE MANAGEMEN
3804 Coconut Palm Drive
Tampa, Florida 33619

Attn: Kent Edwards

For Additional Information, Please Contact
G. William Coppenger, Ph.D.
Yuh-Hsu Pan, Ph.D.
Timothy W. Fitzpatrick
Liang-Tsair Lin, Ph.D.
Suncom 277-2571
(904) 487-2571

Preliminary Review Copy Date: 20-SEP-1993

Abbreviations & Storet Codes:

A - Value reported is the mean of two or more determinations
B - Results based on colony counts outside the acceptable range.
I - Value reported is less than the practical quantitation limit, and greater than or equal to the minimum detection limit.
J - Estimated value
K - Actual value is known to be less than value given
L - Actual value is known to be greater than value given
N - Presumptive evidence of presence of material.
O - Sampled, but analysis lost or not performed.
Q - Sample held beyond normal holding time.
T - Value reported is less than the criterion of detection.
U - Material was analyzed for but not detected; The value reported is the minimum detection limit.

V - Analyte was detected in both sample and method blank.
Z - Colonies were too numerous to count (TNTC).

Sample ID: 61357/93-SEP-01-06-01 Matrix: W-FIELD-BK
Location: INTERNATIONAL PETROLEUM
Field ID: FIELD BLANK
Collected: 30-AUG-1993 08:30 By: TANYA RICE
Authorized: 13-SEP-1993 By: Mei-Fang Shyu
Type: Grab Sample
Lab Comments:
DEP TEMP=1DC
Field Comments:

Analysis ID: W-VOC-MS-A
Volatiles in wtr or waste wtr by 624/5030-8240
Prepared: NA By:
Analyzed: 4-SEP-1993 00:00 By: Jusheng Qi
Authorized: 7-SEP-1993 By: Jusheng Qi

Storet#	Analyte	Value	Units
34030	Benzene	0.50 U	ug/L
32101	Bromodichloromethane	0.50 U	ug/L
32104	Bromoform	0.50 U	ug/L
34413	Bromomethane	O	ug/L
32102	Carbon tetrachloride	0.50 U	ug/L
34301	Chlorobenzene	0.50 U	ug/L
34311	Chloroethane	0.50 U	ug/L
34576	2-Chloroethylvinyl ether	0.50 U	ug/L
32106	Chloroform	0.50 U	ug/L
34418	Chloromethane	0.50 U	ug/L
34536	1,2-Dichlorobenzene	0.50 U	ug/L
34566	1,3-Dichlorobenzene	0.50 U	ug/L
34571	1,4-Dichlorobenzene	0.50 U	ug/L
32105	Dibromochloromethane	0.50 U	ug/L
34496	1,1-Dichloroethane	0.50 U	ug/L
34531	1,2-Dichloroethane	0.50 U	ug/L
34501	1,1-Dichloroethene	0.50 U	ug/L
34546	trans-1,2-Dichloroethene	0.50 U	ug/L
34541	1,2-Dichloropropane	0.50 U	ug/L
34561	cis-1,3-Dichloropropene	0.50 U	ug/L
34561	trans-1,3-Dichloropropene	0.50 U	ug/L
34371	Ethylbenzene	0.50 U	ug/L
34423	Methylene chloride	0.50 U	ug/L
34516	1,1,2,2-Tetrachloroethane	0.50 U	ug/L
34475	Tetrachloroethene	0.50 U	ug/L
34506	1,1,1-Trichloroethane	0.50 U	ug/L
34511	1,1,2-Trichloroethane	0.50 U	ug/L
39180	Trichloroethene	0.50 U	ug/L
34910	Toluene	0.50 U	ug/L
39175	Vinyl chloride	0.50 U	ug/L
81551	Xylenes	0.50 U	ug/L
	Trichlorofluoromethane	0.50 U	ug/L

Comments(1): O due to analytical problem only associated

Continued on Page 3

Storet#	Analyte	Value	Units
	(2): with Bromomethane.		

Sample ID: 61358/93-SEP-01-06-02 Matrix: W-TRIP-BLK
Location: DEP LABORATORY
Field ID: TRIP BLANK
Collected: 25-AUG-1993 07:40 By: F MEISIEK
Authorized: 13-SEP-1993 By: Mei-Fang Shyu
Type: Grab Sample
Lab Comments:
DEP TEMP=1DC
Field Comments:

Analysis ID: W-VOC-MS-A
Volatiles in wtr or waste wtr by 624/5030-8240
Prepared: NA By:
Analyzed: 4-SEP-1993 00:00 By: Jusheng Qi
Authorized: 7-SEP-1993 By: Jusheng Qi

Storet#	Analyte	Value	Units
34030	Benzene	0.50 U	ug/L
32101	Bromodichloromethane	0.50 U	ug/L
32104	Bromoform	0.50 U	ug/L
34413	Bromomethane	O	ug/L
32102	Carbon tetrachloride	0.50 U	ug/L
34301	Chlorobenzene	0.50 U	ug/L
34311	Chloroethane	0.50 U	ug/L
34576	2-Chloroethylvinyl ether	0.50 U	ug/L
32106	Chloroform	0.50 U	ug/L
34418	Chloromethane	0.50 U	ug/L
34536	1,2-Dichlorobenzene	0.50 U	ug/L
34566	1,3-Dichlorobenzene	0.50 U	ug/L
34571	1,4-Dichlorobenzene	0.50 U	ug/L
32105	Dibromochloromethane	0.50 U	ug/L
34496	1,1-Dichloroethane	0.50 U	ug/L
34531	1,2-Dichloroethane	0.50 U	ug/L
34501	1,1-Dichloroethene	0.50 U	ug/L
34546	trans-1,2-Dichloroethene	0.50 U	ug/L
34541	1,2-Dichloropropane	0.50 U	ug/L
34561	cis-1,3-Dichloropropene	0.50 U	ug/L
34561	trans-1,3-Dichloropropene	0.50 U	ug/L
34371	Ethylbenzene	0.50 U	ug/L
34423	Methylene chloride	0.50 U	ug/L
34516	1,1,2,2-Tetrachloroethane	0.50 U	ug/L
34475	Tetrachloroethene	0.50 U	ug/L
34506	1,1,1-Trichloroethane	0.50 U	ug/L

Storet#	Analyte	Value	Units
34511	1,1,2-Trichloroethane	0.50 U	ug/L
39180	Trichloroethene	0.50 U	ug/L
34910	Toluene	0.50 U	ug/L
39175	Vinyl chloride	0.50 U	ug/L
81551	Xylenes	0.50 U	ug/L
	Trichlorofluoromethane	0.50 U	ug/L

Comments(1): O due to analytical problem only associated
(2): with Bromomethane.

********** END OF REPORT **********

FLORIDA DEPARTMENT OF ENVIRONMENTAL PROTECTION
CENTRAL LABORATORY
2600 BLAIR STONE ROAD
TALLAHASSEE, FLORIDA 32399-2400

CHEMICAL ANALYSIS REPORT

Request ID: RQ-93-AUG-30-25
Job ID: 93-SEP-01-09 Project: OTHER
Job Name: INTERNATIONAL PETROLEUM - Job created on 1-SEP
Date Received: 1-SEP-1993 Customer ID: SW-TAM-WSM
Authorized: 21-SEP-1993 By: Tim Fitzpatrick

Submitted By: SW DIST. OFFICE (TAMPA) - WASTE MANAGEMEN
3804 Coconut Palm Drive
Tampa, Florida 33619

Attn: Kent Edwards

For Additional Information, Please Contact
G. William Coppenger, Ph.D.
Yuh-Hsu Pan, Ph.D.
Timothy W. Fitzpatrick
Liang-Tsair Lin, Ph.D.
Suncom 277-2571
(904) 487-2571

Preliminary Review Copy Date: 29-SEP-1993

Abbreviations & Storet Codes:

A - Value reported is the mean of two or more determinations
B - Results based on colony counts outside the acceptable range.
I - Value reported is less than the practical quantitation limit, and greater than or equal to the minimum detection limit.
J - Estimated value
K - Actual value is known to be less than value given
L - Actual value is known to be greater than value given
N - Presumptive evidence of presence of material.
O - Sampled, but analysis lost or not performed.
Q - Sample held beyond normal holding time.
T - Value reported is less than the criterion of detection.
U - Material was analyzed for but not detected; The value reported is the minimum detection limit.

V - Analyte was detected in both sample and method blank.
Z - Colonies were too numerous to count (TNTC).

Sample ID: 61363/93-SEP-01-09-01 Matrix: S-OTHER
Location: INTERNATIONAL PETROLEUM
Field ID: FILTER BASKET
Collected: 30-AUG-1993 08:45 By: TANYA RICE
Authorized: 21-SEP-1993 By: Tim Fitzpatrick
Type: Grab Sample
Lab Comments:
DEP TEMP=1DC
Field Comments:
MATRIX=SLUDGE

Analysis ID: HG-H-TCLP
Mercury in TCLP extracts by Method 7470, modified
Prepared: 7-SEP-1993 00:00 By: Jason Hatcher
Analyzed: 7-SEP-1993 15:00 By: Jason Hatcher
Authorized: 21-SEP-1993 By: Tim Fitzpatrick

Storet#	Analyte	Value	Units
	Mercury	0.0001 U	mg/L

Analysis ID: TCLP-ICP
ICP multielement analysis of TCLP extracts, Method 6010
Prepared: 3-SEP-1993 17:59 By: Jason Hatcher
Analyzed: 8-SEP-1993 14:56 By: Jin-Chaun Liu
Authorized: 21-SEP-1993 By: Tim Fitzpatrick

Storet#	Analyte	Value	Units
	Antimony	0	mg/L
	Aluminum	0	mg/L
	Arsenic	0.2 U	mg/L
	Barium	0.5 A	mg/L
	Cadmium	0.03 U	mg/L
	Chromium	0.1 U	mg/L
	Beryllium	0	mg/L
	Cobalt	0	mg/L
	Copper	0	mg/L
	Calcium	0	mg/L
	Lead	0.15 U	mg/L
	Manganese	0	mg/L
	Nickel	0	mg/L
	Selenium	0.3 U	mg/L
	Iron	0	mg/L
	Silver	0.03 U	mg/L
	Zinc	0	mg/L
	Magnesium	0	mg/L
	Potassium	0	mg/L
	Sodium	0	mg/L

Continued on Page 3

Storet#	Analyte	Value	Units
	Strontium	0	mg/L
	Thallium	0	mg/L
	Vanadium	0	mg/L

Comment Raw Data Transferred to LIMS Electronically

********** END OF REPORT **********

cc! Sam Sahebzamani

DEPARTMENT OF ENVIRONMENTAL REGULATION

ROUTING AND TRANSMITTAL SLIP

ACTION NO

ACTION DUE DATE

	Initial	Date
1. TO: (NAME, OFFICE, LOCATION) Diane Trommer		
2.		
3. RE: File No. I029-114802		
4. INTERNATIONAL PETROLEUM CORPORATION (IPC)		

REMARKS:

On February 20th, 1987, Dr. Garrity, Clabe Polk and Sam Sahebzamani met and decided to ask IPC to withdraw their IW operation permit application and to include the groundwater monitoring provisos from Gardner and Judy in the consent order. (You received a copy of these) A proviso requiring the withdrawal of the IW operation permit application should also be included. Please assure that these provisos are in the consent order as executed.

Thanks. Henry D.

INFORMATION

- Review & Return
- Review & File
- Initial & Forward

DISPOSITION

- Review & Respond
- Prepare Response
- For My Signature
- For Your Signature
- Let's Discuss
- Set Up Meeting
- Investigate & Report
- Initial & Forward
- Distribute
- Concurrence
- For Processing
- Initial & Return

FROM:

DATE 04/17/87

PHONE

Hills.

CLARK
engineers - scientists

D.E.P.
OCT 12 1993
SOUTHWEST DISTRICT
TAMPA

October 7, 1993

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

Re: Summary Report

Dear Mr. Allen:

I have enclosed a copy of the report titled "Summary Report, Waste Characterization Program" that we have prepared at your request. This report summarizes the results obtained for the first three analyses conducted on the monthly accumulation of your combined sump waste and filter basket lint material.

Please contact me if you have any questions about the report.

Yours truly,

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

enclosure

EEC/bjk

cc: R. L. Caleen, Oertel, Hoffman, Fernandez & Cole, P.A.
T. Rice, FDEP Tampa

9277.02

HILLS

CLARK
engineers - scientists

D.E.P.
OCT 25 1993
SOUTHWEST DISTRICT
TAMPA

October 21, 1993

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

Re: September Sampling Results

Dear Mr. Allen:

Enclosed please find the laboratory analytical results for the combined sump waste and pump filter basket lint. This sample was collected on September 28, 1993 by representatives of Edward E. Clark Engineers-Scientists, Inc. (CLARK). The results indicate that the combined sample is classified as non-hazardous, as defined by the TCLP criteria.

We have contacted Mr. Tim Rice, Florida DEP, and scheduled the October sampling for Thursday, October 28, 1993. Please note that October will be the fifth month of sampling under this voluntary five month program.

Please contact me if you have any questions or comments.

Yours truly,

Edward E. Clark

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

EEC/bjk

enclosure

cc: R.L. Caleen, Oertel, Hoffman, Fernandez & Cole, P.A.
T. Rice, Florida DEP, Tampa, FL

Project 9277.02

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
9277.02	CLARK Engineers
Project Location	
Plant City	

LCN	Sample Number	Date	Time	Sample Matrix	Container (s)	Laboratory Analysis: Full TCLP	Laboratory Analysis: Not Pest or Herb.	Comments
142093093	Lint trap wash	9-28-93		S	1	X		

SAMPLED BY:	Transfer Number	Item Number	* Transfers Relinquished by:	Accepted by:	Date	Time
	1			Ralph Faudree	9-28-93	10:35
	2					
	3					
	4					

* Samples that are determined to be hazardous will be returned to submitter.

SPECTRUM
Laboratories, Inc. FORT LAUDERDALE • SAVANNAH

TOXICITY CHARTERISTIC LEACHING PROCEDURE

CLIENT: ENGINEERS & SCIENTIST
SAMPLE NUMBER: 142-093093
LOCATION: 9277.02/LINT BASKET WASTE
ADDITIONAL DATA: PLANT CITY
SAMPLED BY: PAT FOX,CLARK
SUBMITTED BY: RALPH TARDIF,SPECTRUM
DATE SAMPLED: 09/28/93
DATE REPORTED: OCT. 15 1993
REVISION: 0

FL DRINKING WATER: #86144
FL ENVIRONMENTAL: #E86006
GEORGIA: #828,829
SOUTH CAROLINA: #96015
EPA: #FL095
FDER CQAP: #870206G
DATE RECEIVED: 09/30/93
SAMPLE MATRIX: SOIL

ANALYTE	METHOD	RESULT (- = <)	UNITS	REGULATORY CONC.	
ARSENIC TCLP	1311/7060	-0.002	mg/l	5.0	mg/l
BARIUM TCLP	1311/7080	1.02	mg/l	100.0	mg/l
CADMIUM TCLP	1311/7131	0.04	mg/l	1.0	mg/l
CHROMIUM TCLP	1311/7191	0.04	mg/l	5.0	mg/l
LEAD TCLP	1311/7421	0.14	mg/l	5.0	mg/l
MERCURY TCLP	1311/7471	-0.0002	mg/l	0.2	mg/l
SELENIUM TCLP	1311/7740	-0.002	mg/l	1.0	mg/l
SILVER TCLP	1311/7760	-0.04	mg/l	5.0	mg/l
CHLORDANE TCLP	1311/608			30	ug/l
2,4-D TCLP	1311/615			10000	ug/l
ENDRIN TCLP	1311/608			20	ug/l
HEPTACHLOR TCLP	1311/608			8	ug/l
LINDANE TCLP	1311/608			400	ug/l
METHOXYCHLOR TCLP	1311/608			10000	ug/l
TOXAPHENE TCLP	1311/608			500	ug/l
SILVEX TCLP	1311/615			1000	ug/l
BENZENE TCLP	1311/624	-1	ug/l	500	ug/l
CARBN TETRACHLORIDE TCLP	1311/624	-1	ug/l	500	ug/l
CHLOROBENZENE TCLP	1311/624	-1	ug/l	100000	ug/l
CHLOROFORM TCLP	1311/624	-1	ug/l	6000	ug/l
1,2-DICHLOROETHANE TCLP	1311/624	-1	ug/l	500	ug/l
1,1-DICHLORETHYLENE TCLP	1311/624	-1	ug/l	700	ug/l
HEXACHLOROETHANE TCLP	1311/624	-1	ug/l	3000	ug/l
METHYL ETHYL KETONE TCLP	1311/624	-5	ug/l	200000	ug/l
TETRACHLOROETHYLENE TCLP	1311/624	2.93	ug/l	700	ug/l
TRICHLOROETHYLENE TCLP	1311/624	-1	ug/l	500	ug/l
VINYL CHLORIDE TCLP	1311/624	-1	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	-1	ug/l	7500	ug/l
2,4-DINITROTOLUENE TCLP	1311/625	-5	ug/l	130	ug/l
HEXACHLOROBENZENE TCLP	1311/625	-1	ug/l	130	ug/l
HEXACHLOROBUTADIENE TCLP	1311/625	-1	ug/l	500	ug/l
NITROBENZENE TCLP	1311/625	-1	ug/l	2000	ug/l
PENTACHLOROPHENOL TCLP	1311/625	-1	ug/l	100000	ug/l
PYRIDINE TCLP	1311/625	-5	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
LAB MANAGER

1460 W. McNab Road, Ft. Lauderdale, FL 33309 • Phone: (305) 978-6400 • 630 Indian Street, Savannah, Ga. 31401 • Phone: (912) 238-5050

Hills

FLORIDA DEPARTMENT OF ENVIRONMENTAL PROTECTION
CENTRAL LABORATORY
2600 BLAIR STONE ROAD
TALLAHASSEE, FLORIDA 32399-2400

CHEMICAL ANALYSIS REPORT

Request ID: RQ-93-AUG-30-25
Job ID: 93-SEP-01-10 Project: OTHER
Job Name: INTERNATIONAL PETROLEUM - Job created on 1-SEP
Date Received: 1-SEP-1993 Customer ID: SW-TAM-WSM
Authorized: 30-SEP-1993 By: Liang T. Lin

Submitted By: SW DIST. OFFICE (TAMPA) - WASTE MANAGEMEN
3804 Coconut Palm Drive
Tampa, Florida 33619

Attn: Kent Edwards

For Additional Information, Please Contact
G. William Coppenger, Ph.D.
Yuh-Hsu Pan, Ph.D.
Timothy W. Fitzpatrick
Liang-Tsair Lin, Ph.D.
Suncom 277-2571
(904) 487-2571

Preliminary Review Copy Date: 5-OCT-1993

Abbreviations & Storet Codes:

A - Value reported is the mean of two or more determinations
B - Results based on colony counts outside the acceptable range.
I - Value reported is less than the practical quantitation limit, and greater than or equal to the minimum detection limit.
J - Estimated value
K - Actual value is known to be less than value given
L - Actual value is known to be greater than value given
N - Presumptive evidence of presence of material.
O - Sampled, but analysis lost or not performed.
Q - Sample held beyond normal holding time.
T - Value reported is less than the criterion of detection.
U - Material was analyzed for but not detected; The value reported is the minimum detection limit.

V - Analyte was detected in both sample and method blank.
Z - Colonies were too numerous to count (TNTC).

Sample ID: 61364/93-SEP-01-10-01 Matrix: S-OTHER
Location: INTERNATIONAL PETROLEUM
Field ID: FILTER BASKET
Collected: 30-AUG-1993 08:45 By: TANYA RICE
Authorized: 29-SEP-1993 By: Mei-Fang Shyu
Type: Grab Sample
Lab Comments:
DEP TEMP=1DC
Field Comments:
MATRIX=SLUDGE

Analysis ID: TCLP-VOC
Volatiles in TCLP ZHE extract by 5030-8260
Prepared: 9-SEP-1993 00:00 By: Kevin Everett
Analyzed: 14-SEP-1993 00:00 By: Jusheng Qi
Authorized: 24-SEP-1993 By: Jusheng Qi

Storet#	Analyte	Value	Units
	Benzene	9.6	ug/l
	Bromoform	2.5 U	ug/l
	Carbon tetrachloride	2.5 U	ug/l
	Chlorobenzene	2.5 U	ug/l
	Chloroform	2.5 U	ug/l
	1,2-Dichlorobenzene	5.0	ug/l
	1,3-Dichlorobenzene	2.5 U	ug/l
	1,4-Dichlorobenzene	2.5 U	ug/l
	Dibromochloromethane	2.5 U	ug/l
	1,1-Dichloroethane	2.5 U	ug/l
	1,2-Dichloroethane	2.5 U	ug/l
	1,1-Dichloroethene	2.5 U	ug/l
	1,2-Dichloropropane	2.5 U	ug/l
	Ethylbenzene	35	ug/l
	Methylene chloride	11	ug/l
	1,1,2,2-Tetrachloroethane	2.5 U	ug/l
	Tetrachloroethene	7.0	ug/l
	1,1,1-Trichloroethane	7.6	ug/l
	1,1,2-Trichloroethane	2.5 U	ug/l
	Trichloroethene	2.5 U	ug/l
	Toluene	89	ug/l
	Vinyl chloride	2.5 U	ug/l
	Xylenes	240	ug/l

Comments(1): Elevated detection limits due to sample matrix interference.
(2): Tentative identification: total purgeable petroleum hydrocaons=est. 920 ug/L.

********** END OF REPORT **********

FLORIDA DEPARTMENT OF ENVIRONMENTAL PROTECTION
CENTRAL LABORATORY
2600 BLAIR STONE ROAD
TALLAHASSEE, FLORIDA 32399-2400

CHEMICAL ANALYSIS REPORT

Request ID: RQ-93-AUG-30-25
Job ID: 93-SEP-01-07 Project: OTHER
Job Name: INTERNATIONAL PETROLEUM - Job created on 1-SEP
Date Received: 1-SEP-1993 Customer ID: SW-TAM-WSM
Authorized: 21-SEP-1993 By: Tim Fitzpatrick

Submitted By: SW DIST. OFFICE (TAMPA) - WASTE MANAGEMEN
3804 Coconut Palm Drive
Tampa, Florida 33619

Attn: Kent Edwards

For Additional Information, Please Contact
G. William Coppenger, Ph.D.
Yuh-Hsu Pan, Ph.D.
Timothy W. Fitzpatrick
Liang-Tsair Lin, Ph.D.
Suncom 277-2571
(904) 487-2571

Preliminary Review Copy Date: 29-SEP-1993

Abbreviations & Storet Codes:

A - Value reported is the mean of two or more determinations
B - Results based on colony counts outside the acceptable range.
I - Value reported is less than the practical quantitation limit, and greater than or equal to the minimum detection limit.
J - Estimated value
K - Actual value is known to be less than value given
L - Actual value is known to be greater than value given
N - Presumptive evidence of presence of material.
O - Sampled, but analysis lost or not performed.
Q - Sample held beyond normal holding time.
T - Value reported is less than the criterion of detection.
U - Material was analyzed for but not detected; The value reported is the minimum detection limit.

V - Analyte was detected in both sample and method blank.
Z - Colonies were too numerous to count (TNTC).

Sample ID: 61359/93-SEP-01-07-01 Matrix: W-FIELD-BK
Location: INTERNATIONAL PETROLEUM
Field ID: FIELD BLANK
Collected: 30-AUG-1993 08:30 By: TANYA RICE
Authorized: 21-SEP-1993 By: Tim Fitzpatrick
Type: Grab Sample
Lab Comments:
DEP TEMP=1DC
Field Comments:

Analysis ID: HG-H-W
Mercury in liquid samples by Method 245.2
Prepared: 7-SEP-1993 00:00 By: Jason Hatcher
Analyzed: 7-SEP-1993 18:00 By: Jason Hatcher
Authorized: 21-SEP-1993 By: Tim Fitzpatrick

Storet#	Analyte	Value	Units
71900	Mercury	0.1 U	ug/L

Analysis ID: W-ICP-23
ICP multielement analysis of aqueous samples by Method 200.7
Prepared: 13-SEP-1993 09:03 By: Christie Mohammad
Analyzed: 14-SEP-1993 15:37 By: Jin-Chaun Liu
Authorized: 21-SEP-1993 By: Tim Fitzpatrick

Storet#	Analyte	Value	Units
01106	Aluminum	0	ug/L
01002	Arsenic	20 U	ug/L
01097	Antimony	0	ug/L
01007	Barium	1 U	ug/L
01012	Beryllium	0	ug/L
01027	Cadmium	3 U	ug/L
00916	Calcium	0	mg/L
01034	Chromium	10 U	ug/L
01037	Cobalt	0	ug/L
01042	Copper	0	ug/L
01045	Iron	0	ug/L
01051	Lead	15 U	ug/L
00927	Magnesium	0	mg/L
01055	Manganese	0	ug/L
01067	Nickel	0	ug/L
00937	Potassium	0	mg/L
01147	Selenium	30 U	ug/L
01077	Silver	3 U	ug/L
00929	Sodium	0	mg/L
01082	Strontium	0	ug/L

Continued on Page 3

61359/93-SEP-01-07-01/W-ICP-23 Continued from Page 2

Storet#	Analyte	Value	Units
01059	Thallium	0	ug/L
01087	Vanadium	0	ug/L
01092	Zinc	0	ug/L

Comment Raw Data Transferred to LIMS Electronically

********** END OF REPORT **********

Post-it™ brand fax transmittal memo 7671 | # of pages ▸ 2

To	TIM RICE	From	KEN BAUGHMAN
Co.	FDEP TAMPA	Co.	CLARK ENG.
Dept.		Phone #	305 233-1411
Fax #	813 744-6125	Fax #	305 591-1549

SPEC Laboratories, Inc. FORT LAUDERDALE • SAVANNAH

TOXICITY CHARTERISTIC LEACHING PROCEDURE

CLIENT: INTERNATIONAL PETROLEUM
SAMPLE NUMBER: 036-102893
LOCATION: 001-WS
ADDITIONAL DATA: IPC PLANT CITY
SAMPLED BY: JIM OLIVER, SPECTRUM
SUBMITTED BY: GREYHOUND
DATE SAMPLED: 10/28/93 1420
DATE REPORTED: NOV. 15 1993
REVISION: 0

FL DRINKING WATER: #86144
FL ENVIRONMENTAL: #E86006
GEORGIA: #828,829
SOUTH CAROLINA: #96015
EPA: #FL095
FDER COAP: #870206G
DATE RECEIVED: 10/29/93
SAMPLE MATRIX: SOIL

ANALYTE	METHOD	RESULT (- = <)	UNITS	REGULATORY CONC.	
ARSENIC TCLP	1311/7060	0.003	mg/l	5.0	mg/l
BARIUM TCLP	1311/7080	0.31	mg/l	100.0	mg/l
CADMIUM TCLP	1311/7131	0.02	mg/l	1.0	mg/l
CHROMIUM TCLP	1311/7191	0.04	mg/l	5.0	mg/l
LEAD TCLP	1311/7421	0.15	mg/l	5.0	mg/l
MERCURY TCLP	1311/7471	0.0002	mg/l	0.2	mg/l
SELENIUM TCLP	1311/7740	-0.002	mg/l	1.0	mg/l
SILVER TCLP	1311/7760	-0.01	mg/l	5.0	mg/l
CHLORDANE TCLP	1311/608	-1	ug/l	30	ug/l
2,4-D TCLP	1311/615	1.4	ug/l	10000	ug/l
ENDRIN TCLP	1311/608	-1	ug/l	20	ug/l
HEPTACHLOR TCLP	1311/608	-1	ug/l	8	ug/l
LINDANE TCLP	1311/608	-1	ug/l	400	ug/l
METHOXYCHLOR TCLP	1311/608	-1	ug/l	10000	ug/l
TOXAPHENE TCLP	1311/608	-10	ug/l	500	ug/l
SILVEX TCLP	1311/615	-1	ug/l	1000	ug/l
BENZENE TCLP	1311/624	1.13	ug/l	500	ug/l
CARBN TETRACHLORIDE TCLP	1311/624	-1	ug/l	500	ug/l
CHLOROBENZENE TCLP	1311/624	-1	ug/l	100000	ug/l
CHLOROFORM TCLP	1311/624	8.17	ug/l	6000	ug/l
1,2-DICHLOROETHANE TCLP	1311/624	-1	ug/l	500	ug/l
1,1-DICHLORETHYLENE TCLP	1311/624	-1	ug/l	700	ug/l
HEXACHLOROETHANE TCLP	1311/624	-1	ug/l	3000	ug/l
METHYL ETHYL KETONE TCLP	1311/624	34.2	ug/l	200000	ug/l
TETRACHLOROETHYLENE TCLP	1311/624	-1	ug/l	700	ug/l
TRICHLOROETHYLENE TCLP	1311/624	-1	ug/l	500	ug/l
VINYL CHLORIDE TCLP	1311/624	-1	ug/l	200	ug/l
O-CRESOL TCLP	1311/625	1.2	ug/l	200000	ug/l
M-CRESOL TCLP	1311/625	-1	ug/l	200000	ug/l
P-CRESOL TCLP	1311/625	6.4	ug/l	200000	ug/l
1,4-DICHLOROBENZENE TCLP	1311/625	-1	ug/l	7500	ug/l
2,4-DINITROTOLUENE TCLP	1311/625	-5	ug/l	130	ug/l
HEXACHLOROBENZENE TCLP	1311/625	-1	ug/l	130	ug/l
HEXACHLOROBUTADIENE TCLP	1311/625	-1	ug/l	500	ug/l
NITROBENZENE TCLP	1311/625	-1	ug/l	2000	ug/l
PENTACHLOROPHENOL TCLP	1311/625	42.1	ug/l	100000	ug/l
PYRIDINE TCLP	1311/625	-5	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
LAB MANAGER

1460 W. McNab Road, Ft. Lauderdale, FL 33309 • Phone: (305) 978-8400 • 630 Indian Street, Savannah, Ga. 31401 • Phone: (912) 238-5050

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	Laboratory Analysis
COI	International Flavors & Fragrances	
Project Location: IDC Dist. City		

LCN	Sample Number	Date	Time	Sample Matrix	Container (s)	TCLP TCLP						Comments
C36-[illegible]	COI-WS	10/28/93	2:20	Solid Filter Basket Last Composite	2 Glass Soil Jars	X						Tampa Pricing

SAMPLED BY:	Transfer Number	Item Number	* Transfers Relinquished by:	Accepted by:	Date	Time
Jim Wilson	1		Jim Wilson			
	2					
	3					
	4					

* Samples that are determined to be hazardous will be returned to submitter.

12/15/1993 11:51 [illegible]549 CLARK PAGE 02

International Petroleum
Hills CNTY

CLARK
engineers - scientists

D.E.P.
SEP 20 1994
SOUTHWEST DISTRICT
TAMPA

VIA FAX & U.S. MAIL

September 15, 1994

Mr. Tymen Rice
Hazardous Waste Section
Division of Waste Management
Florida Department of Environmental Regulation
Southwest District
3804 Coconut Palm Drive
Tampa, Florida 33619

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

Dear Mr. Rice:

On behalf of our client, International Petroleum Corporation (IPC), the firm of Edward E. Clark Engineers-Scientists, Inc. (CLARK) will be at the IPC facility Friday, September 16, 1994 to collect samples of the combined sludge (sump and pump filter basket lint). The sludge sample will be submitted to Spectrum Laboratories, Inc., for TCLP analysis (less herbicides and pesticides). The results of the laboratory analysis will constitute IPC's yearly chemical characterization of the sludge for 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: R. L. Caleen, Esq.

Project 9277.02

EVALUATION - VIOLATION - ENFORCEMENT FORM 1

LDF L[illegible]F ☐ INC ☐ LQG ☐ SQG ☐ TRA[illegible]CES ☐ NHR ☑

Date Submitted: 3/11/93 By: KMB   Date Entered: __/__/__ By: ______

EPA ID # FLD066566613   County: HILLSBOROUGH

Facility Name: INTERNATIONAL PETROLEUM

Street: 105 S ALEXANDER   City: PLANT CITY

EVALUATION DATA   Add: ☑ Update: ☐ Delete: ☐ (▭ = Required Field)

Evaluation Date Mo.	Day	Year	Data Seq #	Resp. Agency	Evaluation Type	Reason (Option)	District Office	District Inspector
02	10	93		S	CEI		40	KMB

Coverage Areas (EV = Evaluated, NE = Not Evaluated, NA = Not Applicable)

Generators

	EV	NE	NA
GER	☑	☐	☐
GGR	☐	☐	☐
GLB	☐	☐	☐
GMR	☐	☐	☐
GOR	☐	☐	☐
GPT	☐	☐	☐
GRR			
GSC			
GSQ			
NHD			

Transporters

	EV	NE	NA
TGR	☐	☐	☐
TMR	☐	☐	☐
TOR	☐	☐	☐
TPR	☐	☐	☐
TWD	☐	☐	☐

TSDF's

	EV	NE	NA		EV	NE	NA		EV	NE	NA
DCH	☐	☐	☐	DLB	☐	☐	☐	DPB	☐	☐	☐
DCL	☐	☐	☐	DLF	☐	☐	☐	DPP	☐	☐	☐
DCP	☐	☐	☐	DLT	☐	☐	☐	DSI	☐	☐	☐
DFR	☐	☐	☐	DMC	☐	☐	☐	DTR	☐	☐	☐
DGS	☐	☐		DMR				DTT			
DGW				DOR				DWP			
DIN				DOT							

Compliance Schedule (TSD, GEN, TRA)

	EV	NE	NA		EV	NE	NA
FEA				CAS			

Evaluation Comments: (72) 1: ______

EVALUATION DATA (FOLLOW UPS)   Add: ✓ Update: Delete: (▭ = Required Field)

Evaluation Date Mo.	Day	Year	Data Seq #	Resp. Agency	Evaluation Type	Reason (Option)	District Office	District Inspector
02	11	93		S	SPL		40	KMB

EVALUATION DATA (FOLLOW UPS)   Add: Update: Delete: (▭ = Required Field)

Evaluation Date Mo.	Day	Year	Data Seq #	Resp. Agency	Evaluation Type	Reason (Option)	District Office	District Inspector

EVALUATION DATA (FOLLOW UPS)   Add: Update: Delete: (▭ = Required Field)

Evaluation Date Mo.	Day	Year	Data Seq #	Resp. Agency	Evaluation Type	Reason (Option)	District Office	District Inspector

EVALUATION DATA (FOLLOW UPS)   Add: Update: Delete: (▭ = Required Field)

Evaluation Date Mo.	Day	Year	Data Seq #	Resp. Agency	Evaluation Type	Reason (Option)	District Office	District Inspector

EVALUATION DATA (FOLLOW UPS)   Add: Update: Delete: (▭ = Required Field)

Evaluation Date Mo.	Day	Year	Data Seq #	Resp. Agency	Evaluation Type	Reason (Option)	District Office	District Inspector

Comments: ______

Rev (1/14/92)

FDER - RCRA PROGRAM
EVALUATION - VIOLATION - ENFORCEMENT FORM 2

Date Submitted: 04/06/93 By: KMB   Date Entered: __/__/__ By: ______

EPA ID # F L D 0 6 5 6 8 0 6 1 3 | County: HILLSBOROUGH

Facility Name: INTERNATIONAL PETROLEUM

Street: 105 SOUTH ALEXANDER ST | City: PLANT CITY

VIOLATION DATA | Add: ☑ Up: ☐ Del: ■ | Dist. 5 W | Inspector K M B

#1 Agency: S Violation Type: G G R Date (mdy) Determined 03/31/93 (Data Entry) Seq.# ______

Class: I Priority: ___ Return to Compliance: -- Scheduled -- 6/31/93 --- Actual --- __/__/__

Reg. Type: F R Reg. Description (30): 262.11 Haz. Waste Determination

Comment (72): ______

VIOLATION DATA | Add: ☑ Update: ☐ Delete: ■

#2 Agency: S Violation Type: G O R Date (mdy) Determined 03/31/93 (Data Entry) Seq.# ______

Class: II Priority: ___ Return to Compliance: -- Scheduled -- 6/31/93 --- Actual --- __/__/__

Reg. Type: S S Reg. Description (30): 403.751 F.S. Discharge of oil

Comment (72): ______

VIOLATION DATA | Add: ☐ Update: ☐ Delete: ☐

#__ Agency: ___ Violation Type: ___ Date (mdy) Determined __/__/__ (Data Entry) Seq.# ______

Class: ___ Priority: ___ Return to Compliance: -- Scheduled -- __/__/__ --- Actual --- __/__/__

Reg. Type: ___ Reg. Description (30): ______

Comment (72): ______

VIOLATION DATA | Add: ☐ Update: ☐ Delete: ☐

#__ Agency: ___ Violation Type: ___ Date (mdy) Determined __/__/__ (Data Entry) Seq.# ______

Class: ___ Priority: ___ Return to Compliance: -- Scheduled -- __/__/__ --- Actual --- __/__/__

Reg. Type: ___ Reg. Description (30): ______

Comment (72): ______

VIOLATION DATA | Add: ☐ Update: ☐ Delete: ☐

#__ Agency: ___ Violation Type: ___ Date (mdy) Determined __/__/__ (Data Entry) Seq.# ______

Class: ___ Priority: ___ Return to Compliance: -- Scheduled -- __/__/__ --- Actual --- __/__/__

Reg. Type: ___ Reg. Description (30): ______

Comment (72): ______

(Rev 1/14/92)

FDER - RCRA PROGRAM
EVALUATION - VIOLATION - ENFORCEMENT FORM 3

PAGE ___ OF ___

Date Submitted: 4/20/93 By: KMB Date Entered: __/__/__ By: _____

District: SW | Inspector: KMB

EPA ID #: FLD065686013 | County: Hillsborough

Facility Name: INTERNATIONAL PETROLEUM

Street: 105 SOUTH ALEXANDER ST | City: PLANT CITY

ENFORCEMENT DATA Add: ☑ Update: ☐ Delete: ☐ (= Required Field)

Respon Agency: S | Enforcement Type: 120 | Date Action Taken Month Day Year: 04/19/93 | Enforcement Sequence Number (Data Entry Only):

Inspector: KMB | District: SW | Comment (72):

Violations Addressed:

#1	Area 262.11	#___	Area ___	#___	Area ___	#___	Area ___
#2	Area 403.751	#___	Area ___	#___	Area ___	#___	Area ___
#___	Area ___	#___	Area ___	#___	Area ___	#___	Area ___
#___	Area ___	#___	Area ___	#___	Area ___	#___	Area ___

Penalty Data

Assessed Amount: $ 4018400

Settled Amount: $

Payment: $ / $ / $ / $

Date Paid: __/__/__ / __/__/__ / __/__/__ / __/__/__

ENFORCEMENT DATA Add: ☐ Update: ☐ Delete: ☐ (= Required Field)

Respon Agency: S | Enforcement Type: 115 | Date Action Taken Month Day Year: 05/19/93 | Enforcement Sequence Number (Data Entry Only):

Inspector: | District: | Comment (72):

Violations Addressed:

#1	Area 62R	#___	Area ___	#___	Area ___	#___	Area ___
#2	Area 07IF	#___	Area ___	#___	Area ___	#___	Area ___
#___	Area ___	#___	Area ___	#___	Area ___	#___	Area ___

Penalty Data

Assessed Amount: $

Settled Amount: $

Payment: $ / $ / $ / $

Date Paid: __/__/__ / __/__/__ / __/__/__ / __/__/__

Enforcement Comments (74): _____

Rev (1/14/92)

Florida Department of
Environmental Protection

Lawton Chiles
Governor

Southwest District
3804 Coconut Palm Drive
Tampa, Florida 33619
813-744-6100

Virginia B. Wetherell
Secretary

FEB 14 1994

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

Dear Mr. Allen:

The Department is in receipt of your "Final Report; Waste Characterization Program" document, dated January 27, 1994. The analyses from the series of sampling events from your combined sump and filter basket lint sludge indicate that it is not a hazardous waste and is not regulated under RCRA. Furthermore, sampling results presented in your "Summary Report; Waste Characterization Program", dated October 4, 1993, indicate that the area of suspected oil stained soils is not excessively contaminated.

We appreciate the efforts that you have taken to ensure that you are in compliance. We suggest that you continue TCLP testing of the sludge on an annual basis, as your customers and the nature of their waste streams may change over time.

Based on the results of your analyses, the Department is hereby closing Warning Notice #WN93-0023HW29SWD.

Sincerely,

William Kutash
Waste Program Administrator

xc: Compliance File
Enforcement File

TJR/tjr

State of Florida
Department of Environmental Regulation

District Routing Slip

To: Bill Kutash Date: 12-23-93

C.C. To:

	Pensacola	**Northwest District**	
	Panama City	Northwest District Branch Office	
	Tallahassee	Northwest District Branch Office	
	Apalachicola	Northwest District Satellite Office	
X	**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 ☐ Reply Required ☐ Info Only ☐
Date Due _____ Date Due: _____

Comments:

RECEIVED
DEC 28 1993
Department of Environmental Protection
SOUTHWEST DISTRICT
BY: KJ

From: Janet Ashwood Tel.: 278-0300

10-31-90

Florida Department of
Environmental Protection

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

Lawton Chiles
Governor

Virginia B. Wetherell
Secretary

International Petroleum
H.W. ENC
14.115
MP 1/3/94
NW

December 16, 1993

RECEIVED
DEC 28 1993
Department of Environmental Protection
BY SOUTHWEST DISTRICT

Mr. R.L. Caleen, Jr.
Oertel, Hoffman, Fernandez &
Cole, P.A.
Post Office Box 6507
Tallahassee, Florida 32314-6507

RE: Testing and Disposal of Spent Antifreeze

Dear Mr. Caleen:

This is in response to your October 14, 1993 letter to the Department regarding the testing and disposal of spent antifreeze. The Department's policy memo dated February 2, 1988 is still effective except lead is not the sole constituent of concern in our experience with this waste stream. The waste analysis plan for testing of spent antifreeze should also include benzene, perchloroethylene and trichloroethylene.

The study performed by the New Jersey Department of Environmental Protection concluded that antifreeze does not exhibit TCLP hazardous waste characteristics. Safety Kleen's initial testing data indicated that spent antifreeze is hazardous. However, Safety Kleen later determined that the spent antifreeze it tested was non-hazardous. The Department cannot clearly conclude that spent antifreeze is non-hazardous at all times. Therefore, the Department's position remains that a generator is responsible for all hazardous waste determinations pursuant to 40 CFR 262.11.

In EPA's proposed universal waste rule, 58 F.R. 8102, February 11, 1993 spent antifreeze is included as a waste stream to exempt from treatment as a hazardous waste. The proposed universal waste rule encourages proper management of wastes and the minimization of regulatory requirements imposed on generators, transporters and consolidation facilities. The universal waste rule relies on good management practices to ensure protection of the environment. The Department is encouraging EPA in its efforts to finalize this proposed rule.

Please advise your clients that 40 CFR 262.11 requires a generator to make a determination whether or not its waste are hazardous. If you have any questions, please contact Janet Ashwood of my staff at 904/488-0300.

Sincerely,

Satish Kastury
Environmental Administrator
Hazardous Waste Regulation

SK/ja

cc: Wanda Parker, DEP
Diana Davis, OGC
Michael Hatcher, DEP
Glenn Perrigan, DEP
Raoul Clarke, DEP
Vivik Kamath, DEP-WPB
Tom Moody, DEP-Pensacola
Mike Fitzsimmons, DEP-Jax
Bill Bostwick, DEP-Orlando
Bill Kutash, DEP-Tampa
Phil Edwards, DEP-Fort Myers

International Petroleum
Hills Corp

CLARK
engineers - scientists

VIA FAX & U.S. MAIL

September 15, 1994

Mr. Tymen Rice
Hazardous Waste Section
Division of Waste Management
Florida Department of Environmental Regulation
Southwest District
3804 Coconut Palm Drive
Tampa, Florida 33619

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

Dear Mr. Rice:

On behalf of our client, International Petroleum Corporation (IPC), the firm of Edward E. Clark Engineers-Scientists, Inc. (CLARK) will be at the IPC facility Friday, September 16, 1994 to collect samples of the combined sludge (sump and pump filter basket lint). The sludge sample will be submitted to Spectrum Laboratories, Inc., for TCLP analysis (less herbicides and pesticides). The results of the laboratory analysis will constitute IPC's yearly chemical characterization of the sludge for 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: R. L. Caleen, Esq.

Project 9277.02

Post-it™ brand fax transmittal memo 7671 | # of pages ▸ 1

To Tymen Rice	From E.E. Clark
Co. FDEP	Co. Clark Engrs.
Dept. Hazardous Waste	Phone # 305-233-1411
Fax # 1-813-744-6712	Fax # 305-591-1549

CLARK
engineers-scientists

FAX TRANSMITTAL FORM

To: Mr. Timpon Rice Date: 7-23-93
Firm: Florida DEP - Tampa Fax No: 1-813-744-8423
From: Ken Baughman Time Sent:

SPECIAL INSTRUCTIONS/COMMENTS

Laboratory results for filter basket unit composite sludge sample collected at IPC, Plant City, FL on June 28, 1993.

No. of Pages (including transmittal): -2-

Please call (305) 233-1411 if you do not receive all pages

Fax No: (305) 591-1549

7270 N.W. 12th Street, Suite 740
Miami, Florida 33126

SPECTRUM
Laboratories, Inc. FORT LAUDERDALE • SAVANNAH

TOXICITY CHARTERISTIC LEACHING PROCEDURE

CLIENT: ENGINEERS & SCIENTIST
SAMPLE NUMBER: 022-062993
LOCATION: 9277.02/WS-1
ADDITIONAL DATA: IPC PLANT CITY
SAMPLED BY: JAMAL
SUBMITTED BY: DWIGHT SLUSHER
DATE SAMPLED: 06/28/93 1040
DATE REPORTED: JULY 19 1993
REVISION: 0

FL DRINKING WATER: #86144
FL ENVIRONMENTAL: #E86006
GEORGIA: #828
SOUTH CAROLINA: #96015
EPA: FL095

DATE RECEIVED: 06/28/93
SAMPLE MATRIX: SOIL

ANALYTE	METHOD	RESULT	UNITS	MDL ug/l	REGULATORY CONC. mg/l
ARSENIC TCLP	1311/7060	0.003	mg/l	2.0	5.0
BARIUM TCLP	1311/7080	0.72	mg/l	100	100.0
CADMIUM TCLP	1311/7131	0.0021	mg/l	10	1.0
CHROMIUM TCLP	1311/7191	0.003	mg/l	50	5.0
LEAD TCLP	1311/7421	0.071	mg/l	100	5.0
MERCURY TCLP	1311/7471	-0.0002	mg/l	0.2	0.2
SELENIUM TCLP	1311/7740	-0.002	mg/l	2.0	1.0
SILVER TCLP	1311/7760	-0.01	mg/l	10	5.0
CHLORDANE TCLP	1311/608	-1	ug/l	10	0.03
2,4-D TCLP	1311/615	-1	ug/l	10	10.0
ENDRIN TCLP	1311/608	-1	ug/l	1.0	0.02
HEPTACHLOR TCLP	1311/608	-1	ug/l	1.0	0.008
LINDANE TCLP	1311/608	-1	ug/l	1.0	0.4
METHOXYCHLOR TCLP	1311/608	-1	ug/l	1.0	10.0
TOXAPHENE TCLP	1311/608	-10	ug/l	10	0.5
SILVEX TCLP	1311/615	-1	ug/l	10	1.0
BENZENE TCLP	1311/624	4.62	ug/l	1.0	0.5
CARBN TETRACHLORIDE TCLP	1311/624	-1	ug/l	1.0	0.5
CHLOROBENZENE TCLP	1311/624	-1	ug/l	1.0	100.0
CHLOROFORM TCLP	1311/624	-1	ug/l	1.0	6.0
1,2-DICHLOROETHANE TCLP	1311/624	-1	ug/l	1.0	0.5
1,1-DICHLOROETHYLENE TCLP	1311/624	-1	ug/l	1.0	0.7
HEXACHLOROETHANE TCLP	1311/624	-1	ug/l	1.0	3.0
METHYL ETHYL KETONE TCLP	1311/624	-5	ug/l	5.0	200.0
TETRACHLOROETHYLENE TCLP	1311/624	1.82	ug/l	1.0	0.7
TRICHLOROETHYLENE TCLP	1311/624	-1	ug/l	1.0	0.5
VINYL CHLORIDE TCLP	1311/624	-1	ug/l	1.0	0.2
O-CRESOL TCLP	1311/625	41.1	ug/l	1.0	200.0
M-CRESOL TCLP	1311/625	-1	ug/l	1.0	200.0
P-CRESOL TCLP	1311/625	17.7	ug/l	1.0	200.0
1,4-DICHLOROBENZENE TCLP	1311/625	-1	ug/l	1.0	7.5
2,4-DINITROTOLUENE TCLP	1311/625	-5	ug/l	10	0.13
HEXACHLOROBENZENE TCLP	1311/625	-1	ug/l	10	0.13
HEXACHLOROBUTADIENE TCLP	1311/625	-1	ug/l	10	0.5
NITROBENZENE TCLP	1311/625	-1	ug/l	10	2.0
PENTACHLOROPHENOL TCLP	1311/625	-1	ug/l	50	100.0
PYRIDINE TCLP	1311/625	-10	ug/l	10	5.0
245-TRICHLOROPHENOL TCLP	1311/625	-1	ug/l	10	400.0
246 TRICHLOROPHENOL TCLP	1311/625	-1	ug/l	10	2.0

MDL = METHOD DETECTION LIMIT

IF YOU HAVE ANY QUESTIONS PLEASE CONTACT ME.

DONALD S. MCCORQUODALE, JR., PHD
MICROBIOLOGIST

ENVIRONMENTAL PROTECTION COMMISSION

OF HILLSBOROUGH COUNTY (813) 272-5960

ROUTING SLIP

TO:

1. D.E.R.
2.
3.
4.
5.

D.E.R.

6.
7. MAY 04 1993
8. SOUTHWEST DISTRICT
9. TAMPA
10.

- [X] ACTION
- [ ] APPROVAL
- [ ] AS REQUESTED
- [ ] CONCURRENCE
- [ ] CORRECTION
- [ ] FILING
- [ ] FULL REPORT
- [ ] HANDLE DIRECT
- [ ] INITIAL
- [ ] NOTE & RETURN
- [ ] PER CONVERSATION
- [ ] RECOMMENDATIONS
- [ ] CALL ME
- [ ] SEE ME
- [ ] SIGNATURE
- [ ] YOUR COMMENT
- [ ] YOUR INFORMATION

- [ ] ANSWER OR ACKNOWLEDGE ON OR BEFORE _____
- [ ] PREPARE REPLY FOR SIGNATURE OF D.E.R.

REMARKS:

MAY 04 1993

SOUTHWEST DISTRICT
TAMPA

FROM: E. BAKER

DATE: 5-3-93

FOR: F.D.E.R

International Petroleum INV ENF

ENVIRONMENTAL PROTECTION COMMISSION OF HILLSBOROUGH COUNTY
COMPLAINT REPORT S-T-R ____ ____ ____

No. 33067

Date/Time: 5-3-93/1010 Taken By: E. BAKER

Air ___
___ Mobile Source
___ NESHAP Source
___ Noise
___ Odor
___ Open Burning
___ Industrial
___ Other

Ecosystems ___
___ Dredging
___ Filling
___ Excavation
___ Draining
___ Clearing
___ Other

Waste ___
___ Solid Waste
___ Haz. Waste
___ SQG
___ Groundwater
___ Petroleum
___ Tanks
___ Other

Water ___
___ Domestic
___ Industrial
___ Surface Water
___ Groundwater
___ Odor
___ Sludge
___ Other

Complainantant's Name: EPC STAFF Phone: 272-5788

Complainant's Address: _____

Complaint: INTERNATIONAL OIL SERVICE (FDER# J000050) TRANSPORTED PAINT WASTES (HAZ) MIXED WITH USED OIL FROM S.E. TRUCK AND TRAILER (4111 TRASK ST)

Date/Time of Investigation: _____ Investigator: _____

Findings and Action Taken _____

Staff	Min.
Total	

Date Complainant was Notified: _____

Date Investigation was Closed: _____

Warning Notice(s) Issued? (Date/#): _____

12/91

FOR: F.D.E.R

ENVIRONMENTAL PROTECTION COMMISSION
OF HILLSBOROUGH COUNTY
COMPLAINT REPORT

No. 33067

S-T-R ____ ____ ____

Date/Time: 5-3-93/1010 Taken By: E. BAKER

Air ___
___ Mobile Source
___ NESHAP Source
___ Noise
___ Odor
___ Open Burning
___ Industrial
___ Other

Ecosystems ___
___ Dredging
___ Filling
___ Excavation
___ Draining
___ Clearing
___ Other

Waste ___
___ Solid Waste
___ Haz. Waste
___ SQG
___ Groundwater
___ Petroleum
___ Tanks
___ Other

Water ___
___ Domestic
___ Industrial
___ Surface Water
___ Groundwater
___ Odor
___ Sludge
___ Other

Complainantant's Name: EPC STAFF Phone: 272-5788

Complainant's Address: _____

Complaint: INTERNATIONAL OIL SERVICE (FDER# J00005U0) TRANSPORTED PAINT WASTES (HAZ) MIXED WITH USED OIL FROM S.E. TRUCK AND TRAILER (4111 TRASK ST)

Date/Time of Investigation: _____ Investigator: _____

Findings and Action Taken _____

Staff	Min.
Total	

Date Complainant was Notified: _____

Date Investigation was Closed: _____

Warning Notice(s) Issued? (Date/#): _____

12/91

FOR: F.D.E.R.

ENVIRONMENTAL PROTECTION COMMISSION No. 33067
OF HILLSBOROUGH COUNTY
COMPLAINT REPORT S-T-R ____ ____ ____

Date/Time: 5-3-93/1010 Taken By: E. BAKER

Air ___
___ Mobile Source
___ NESHAP Source
___ Noise
___ Odor
___ Open Burning
___ Industrial
___ Other

Ecosystems ___
___ Dredging
___ Filling
___ Excavation
___ Draining
___ Clearing
___ Other

Waste ___
___ Solid Waste
___ Haz. Waste
___ SQG
___ Groundwater
___ Petroleum
___ Tanks
___ Other

Water ___
___ Domestic
___ Industrial
___ Surface Water
___ Groundwater
___ Odor
___ Sludge
___ Other

Complainantant's Name: EPC STAFF Phone: 272-5788

Complainant's Address: _____

Complaint: INTERNATIONAL OIL SERVICE (FDER# J00005U0) TRANSPORTED PAINT WASTES (HAZ) MIXED WITH USED OIL FROM S.E. TRUCK AND TRAILER (4111 TRASK ST)

Date/Time of Investigation: _____ Investigator: _____

Findings and Action Taken _____

Staff	Min.
Total	

Date Complainant was Notified: _____

Date Investigation was Closed: _____

Warning Notice(s) Issued? (Date/#): _____

12/91

INTERNATIONAL PETROLEUM CORPORATION

April 6. 1993

Department of Environmental Regulation
Attn: Mr. Kevin Bull. Environmental Specialist
RCRA Enforcement/Compliance
Southwest District
3804 Coconut Drive
Tampa, Florida 33619

Dear Mr. Bull:

As per your request, I am sending you the Certificate of Analysis on the filter basket waste. Also included is a draft copy of our gallonage that is due in Tallahassee by June 30. 1993. This gallonage report is a draft copy and after further review may be altered.

Sincerely.

Garry R. Allen
President

GRA:pw
Enc:(2)

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

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

Attn: Tony Malatino, CHMS

Report Date: 02/19/93

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	0.0023
	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, Vmat M Giampa
Vincent M. Giampa, Laboratory Supervisor

- 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	

DRAFT

DER Form # 17-710.900(3)
Form Title Annual Report by Used Oil Facilities and Transporters
Effective Date January 17, 1990
DER Application No. (Filled in by DER)

SECTION C
(This entire page to be filled out by Transporters and Recycling Facility Operators Only)

Amount of Used Oil and Oily Waste (gallons) Collected From the following sources:	Automotive	Industrial	Mixed
9. CO – Commercial (service stations, garages and shops)	3412284	13010	665
10. AG – Agricultural	95607		23353
11. IN – Industrial (manufacturing, construction, mining or other industrial processing operations	1895	2600	676397
12. MI – Military (all except ships and port facilities)			
13. PC – Public Used Oil Collection Centers			
14. TE – Non-Marine Transportation Terminals (railyards, airports and vehicle fleet terminals)	296665		115447
15. BP – Bulk Petroleum Storage Terminals (tank bottoms, etc.)			94001
16. OF – Sources Outside Florida			6765163
17. SH – Ships, Port Facilities, Marinas			
18. OT – Other Sources (specify)			
19. BI – Beginning Inventory			415990
20. TR or RE – Used Oil Transporter or Recycling Facility			3759724
21. Total Amount of Used Oil and Oily Waste Collected During Reporting Period (add items 9-20)	3806451	15610	11850740
Amount of Used Oil and Oily Waste (gallons) Marketed, Disposed or End Used:	Automotive	Industrial	Mixed
22. NE – Total amount of used oil or oily waste transferred to other facilities for processing			
23. MBI – Marketed as a Fuel In-State or On-Site Burner	1032362	15610	3269147
24. MBO – Marketed as a Fuel Out-of-State			
25. MINI – Marketed for an Industrial Process In-State or On-Site Industrial Processor (specify process) Phosphate flotation	2022441		6404395
26. MINO – Marketed for an Industrial Process Out-of-State (specify process)			
27. DS – Disposal - Underline type of material and specify disposal method and amount Type: Bottom Sediment, Water, Oily Waste, Other Method: ☐ Landfill ☒ Wastewater Treatment Unit ☐ Incinerator ☐ Other (specify)	751648		1301205
28. EI – Total Inventory on Hand (end of year)			875993
29. Total Amount of Used Oil and Oily Waste from Lines 22-28 (the sum of the three columns of this line should be approximately equal to the sum of the three columns on line 21)	3806451	15610	11850740
30. EU – End User (specify end use: burned, phosphate flotation, form oil, chain oil, trap dipping, disposal, other)			

To the best of my knowledge and belief, I certify the information provided in this report is a true, accurate and complete presentation of the information required by Section 17-710.520, Florida Administrative Code.

Name of Authorized Person (Please print or type) _____ Signature of Authorized Person _____ Date

NOTICE OF MEETING

Today's date: 5-3-93 Writer: KBull

Date of meeting: 5-19-93

Time: 10:00 a.m.

Place: _____

Subject: ~~Notice of~~ Warning Letter
Intercontinental Petroleum Corp.

Explanation: To discuss alleged violations

Requested by: Rip Calleen I.P.C. Ph.# 229-1739

Names of attendees other than DER: Jim Clark, Clark Environmental; Tony Malatesta, Malatesta & Associates, Garry Allen, IPC.

Local Program notified: ___/yes ___/no Attending? _____

Copies to anticipated in-house attendees: Beth Krauss.

Information copies to:

TPA-04
07/88
/jdj