



FLORIDA DEPARTMENT OF Environmental Protection

Southwest District Office
13051 North Telecom Parkway #101
Temple Terrace, Florida 33637-0926

Ron DeSantis
Governor

Jeanette Nuñez
Lt. Governor

Noah Valenstein
Secretary

January 13, 2020

Tony Piotrowski
105 S. Alexander Street
Plant City, FL 33563
David.Smith1@bicgraphic.com

Re: Heritage Crystal-Clean, LLC
Facility ID No. FLD065680613
Hillsborough County

Dear Mr. Piotrowski:

Department personnel conducted a compliance inspection of the above-referenced facility on December 12, 2019. Based on the information provided during and following the inspection, the facility was determined to be in compliance; any non-compliance items listed in the inspection report have been corrected. A copy of the inspection report is attached for your records.

The Department appreciates your efforts to maintain this facility in compliance with state and federal rules. Should you have any questions or comments, please contact Shannon Lenhart at 813-470-5939, or via e-mail at: Shannon.Lenhart@FloridaDEP.gov.

Sincerely,

A handwritten signature in blue ink, appearing to read "SK", is written over a horizontal line.

Shannon Kennedy
Compliance Assurance Program
Southwest District
Florida Department of Environmental Protection

ec: Shannon Kennedy, DEP; Shannon.Kennedy@floridadep.gov
Shannon Lenhart, DEP; Shannon.Lenhart@floridadep.gov
Don Stillwaugh, Pinellas County; Dstillwa@co.pinellas.fl.us
Anita Decina, Heritage-Crystal Clean, LLC; Anita.Decina@Crystal-Clean.com



**Florida Department of
Environmental Protection
Hazardous Waste Inspection Report**

FACILITY INFORMATION:

Facility Name: Heritage Crystal-Clean LLC
On-Site Inspection Start Date: 12/12/2019 **On-Site Inspection End Date:** 12/12/2019
ME ID#: 28737 **EPA ID#:** FLD065680613
Facility Street Address: 105 S Alexander St, Plant City, Florida 33563-4833
Contact Mailing Address: 2175 Point Blvd Suite 375, Elgin, Illinois 60123
County Name: Hillsborough **Contact Phone:** (847) 836-5670

NOTIFIED AS:

Transporter, Used Oil, VSQG

WASTE ACTIVITIES:

Generator: VSQG **Transporter:** Commercial Waste **Used Oil:** On-Spec, Off-Spec, Oil Filters, Processor **Other:** Both

INSPECTION TYPE:

Routine Inspection for Used Oil Transporter Facility
Routine Inspection for Used Oil Processor Facility
Routine Inspection for Used Oil Marketer Facility
Routine Inspection for Used Oil Generator Facility
Routine Inspection for Hazardous Waste Transporter Facility

INSPECTION PARTICIPANTS:

Principal Inspector: Shannon Lenhart, Inspector
Other Participants: Shannon Kennedy, Environmental Manager; Tony Piotrowski, Facility Manager

LATITUDE / LONGITUDE: Lat 28° 0' 42.0089" / Long 82° 8' 24.5084"

NAIC: 423930 - Recyclable Material Merchant Wholesalers

TYPE OF OWNERSHIP: Private

Introduction:

Heritage Crystal-Clean, LLC (HCC) was inspected by the Department on December 12, 2019 to determine compliance with the facility's permit and with state and federal regulations governing used oil and hazardous waste. HCC is a used oil transporter, processor and marketer of on-spec used oil operating under permit #30676-010-HO, which expires on August 20, 2023. The facility produces a fuel oil that is equivalent to No. Five Fuel Oil and an industrial oil for the phosphate industry. The site contains an oil re-refinery facility, laboratory, industrial wastewater pretreatment facility, storage tanks, maintenance garage and administration buildings. Little has changed at the facility since the previous inspections of May 20, 2016 and January 30, 2018, except as noted. Department personnel were accompanied by Mr. Tony Piotrowski, facility manager.

Process Description:

Heritage Crystal-Clean, LLC is a used oil re-refining facility. The facility collects used oils, oily wastes, petroleum contact water (PCW), off-specification fuels, used oil filters, and waste antifreeze from numerous commercial generators and transports them to the facility. HCC receives used oils via truck, tanker truck and occasionally rail car. The oils are screened for halogens by field test methods. If the used oil is found to contain >1,000 ppm halogens, the oil will not be collected without direction and approval from Crystal-Clean's divisional oil and vacuum service manager. In addition to the field screening, at least one retain sample is obtained at each pick-up. Oils are screened again by on-site lab testing. All incoming loads are screened for halogen content upon arrival. The oils are transferred to registered above-ground storage tanks, eventually to be processed on-site in

Heritage Crystal-Clean LLC Inspection Report

Inspection Date: 12/12/2019

the facility's used oil processing system. Processed/reclaimed oil is tested to determine specification, and then sold. Single source loads that fail the screening are kept segregated until the presumption is either rebutted or not. If it cannot be rebutted, the load is rejected, and usually returned to the generator unless other arrangements are made. Loads of consolidated used oil that fail the halogen screening upon arrival are segregated and analyzed to characterize the waste. Each retain sample is then analyzed to determine which customer had the contaminated used oil. If the presumption can be rebutted based on who generated it (e.g., VSQG) it will be accepted. If not, the load is transported to a TSD, and the original generator signs the hazardous waste manifest. Segregation for loads received from a third party transporter are segregated by placing the material into a dedicated tank and are not released until additional screening is conducted and passed.

Once at the facility, used oil filters are transferred from drums to dumpster hoppers. The dumpster hoppers are then transferred into roll-offs located on site. There is no longer a used oil filter crusher located on site, as the crusher was drained and scrapped in 2016. Used oil filters are sent to Miami, Florida where they are crushed and smelted. Paper used oil filters are managed as non-hazardous waste and are sent to McKay Bay Waste-to-Energy facility.

Totes of antifreeze are brought to the facility via tractor trailers. Antifreeze is maintained in Tank One, and then sent to the old Glyeco plant in Lakeland that was acquired by HCC in February of 2019; the Lakeland facility only receives antifreeze.

GARAGE

The garage area is a covered area and includes an impermeable surface. Various properly labeled used oil and used oil filter drums were located in this area. Drums containing used oil filters are placed in the drum dumper, and the contents of the drums are emptied into one, four cubic-yard dumpster hopper. Empty drums are stored in the northwest corner of the garage, and are then brought back to facilities for reuse.

TRAILER STRIPPING AREA

Four properly closed and labeled used antifreeze totes were observed in the trailer stripping area. In addition, various dumpster hoppers containing used oil filters were observed. At the time of the inspection, the dumpster hoppers containing used oil filters were not covered or otherwise protected from the weather. Facility personnel indicated that the used oil filters located in the dumpster hoppers were in the process of being transferred to roll-offs. Department personnel informed the facility that unless adding or removing filters, the hoppers must be covered or otherwise protected from the weather. At the time of the inspection, the dumpster hoppers were relocated into the covered garage.

DRUM WASH AREA

Older and/or damaged drums that are no longer in use are brought to the drum wash area and are cleaned using a hot water steamer.

RAIL CARS

Five rail cars are leased by HCC, three of which were located on site at the time of the inspection. None of the rail cars on site contained any materials at the time of the inspection. One out-of-service tank (Tank #24) was located adjacent to the rail cars. Facility personnel indicated that the tank caught fire in 2003, and is scheduled to be cleaned and demolished in Quarter Three of 2020.

UNLOADING PAD

Two 40 yard roll-offs and one 30 yard roll-off were observed in the unloading pad area. Each roll-off container was located within the containment area, and no visible cracks or seepage was observed. At the time of the inspection, the roll-offs were not closed or otherwise protected from the weather. Department personnel indicated that the roll-offs must be closed/protected from the weather when not actively loading or unloading the roll-offs.

TANKS

Tanks two, three, four, five, seven, eight, nine, and ten are located in the south farm tank area. These tanks are used as the guard tanks. Tank numbers six, eleven, twelve, C1, C2, C3, and 552 store refined fuel oil product. The central tank farm consists of tank 630 and tank 552. Tank 630 contains oil used to fuel the refining process. The compacter was located adjacent to the central tank farm and is vacuumed out when necessary. All tanks were observed to be appropriately labeled (e.g., used oil, petroleum contact water, etc.) and well maintained.

Heritage Crystal-Clean LLC Inspection Report

Inspection Date: 12/12/2019

WASH PAD

After refining, finished product (No. Five fuel oil) is sent for shaking in the wash pad area, and then is stored in a designated tank. The oil will then be sent to Indianapolis for further refining or will be sold locally.

TRUCK STAGING AREA

Several vacuum trucks were located in the truck staging area. One truck's sump pump was approximately three quarters full at the time of the inspection, and one 1993 vacuum truck was out of service. Facility personnel indicated that at the time of the inspection, the truck was parked there due to a lack of open parking spaces on the property and is usually parked within the loading pad area. At the time of the inspection, Department personnel explained that the tanker truck must be located on the unloading pad and cannot be storing used oil in the parking lot area for more than 24-hours. Following the inspection, photo documentation of the tanker truck located within the loading pad area was received via email on December 20, 2019. Two, twenty-yard roll-offs were present in this area as well. One roll-off contained cleaned carts, and the other contained scrap metals.

PLANT MAINTENANCE SHED

The maintenance shed consisted of two drums of product degreaser labeled corrosive, as well as product paints and coating used for the containment areas. Paints are bought as needed. One empty dumpster hopper was located in this area as well.

REFINERY SLAB

Used oil in Tank 630 is piped to the oil processing area to feed the furnace. When the oil first enters the processing area, it goes through an atmospheric distillation column, then through a vacuum distillation column, and finally it is pumped to Tank 30 KV. The processed used oil is then transferred from Tank 30 KV to Tank 552, where it is sampled and tested to verify that it meets the used oil on-specification criteria. After the oil has met all of the on-specification criteria, the oil in the tank is pumped to either the truck or rail car for shipment, or for further blending. Two primary re-processed fuel products are produced from the refining process: fuel oil that is equivalent to No. Five Fuel Oil and flotation oil for the phosphate mining industry.

LAB

The electronic "long sheet" located in the control room section of the lab tracks incoming truck shipments. Emergency coordinator contact information was posted in a visible area on the wall in the control room. Labeled used oil samples are maintained in the cabinets two, three, and four in the lab. Cabinet one contains product.

RECORDS REVIEW

Records of inspections of the facility, tank systems, containment, yard, etc., were reviewed and appear to be current and in accordance with the permit requirements. Used oil shipping records for 2017 through 2019 were spot checked, and the facility appears to be recording all required information. The facility's non-conforming log was reviewed and appeared to be up to date. A copy of the WAP and SPCC plan was located at the facility. A valid registration form and ID number was posted in a prominent place (offices building) in the facility. Tracking to ensure that 95% of maximum capacity is not exceeded was implemented and up to date. The Department requested copy of the following documents via email on December 18, 2019: WAP, SPCC plan, Contingency Plan, documents containing arrangements made with local authorities, and documents from the nonconforming log as discussed on site. On December 20, 2019, facility personnel provided all requested information. A review of the submitted documents were reviewed and appear adequate.

PHOTO ATTACHMENTS:

Heritage Crystal-Clean LLC Inspection Report

Inspection Date: 12/12/2019

Properly labeled tanks and compacter area



Conclusion:

Heritage Crystal-Clean, LLC appears to be operating in compliance with the associated used oil permit (permit #30676-010-HO) as well as applicable rules and regulations.

Heritage Crystal-Clean LLC Inspection Report

Inspection Date: 12/12/2019

1.0: Pre-Inspection Checklist

Requirements:

The requirements listed in this section provide an opportunity for the Department's inspector to indicate the conditions found at the time of the inspection. A "Not Ok" response to a requirement indicates either a potential violation of the corresponding rule or an area of concern that requires more attention. Both potential violations and areas of concern are discussed further at the end of this inspection report.

Note: Checklist items with shaded boxes are for informational purposes only.

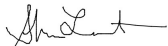
Item No.	Pre-Inspection Review	Yes	No	N/A
1.1	Has the facility notified with correct status? 262.18(a)	✓		
1.2	Has the facility notified of change of status? 62-730.150(2)(b)	✓		
1.3	Did the facility conduct a waste determination on all wastes generated? 262.11	✓		

Heritage Crystal-Clean LLC Inspection Report

Inspection Date: 12/12/2019

Signed:

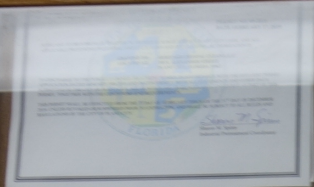
A hazardous waste compliance inspection was conducted on this date, to determine your facility's compliance with applicable portions of Chapters 403 & 376, F.S., and Chapters 62-710, 62-730, 62-737 & 62 -740 Florida Administrative Code (F.A.C.). Portions of the United States Environmental Protection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

Shannon Lenhart	Inspector
Principal Investigator Name	Principal Investigator Title
	FDEP-SWD
Principal Investigator Signature	Organization
	01/08/2020
	Date
<hr/>	
Shannon Kennedy	Environmental Manager
Inspector Name	Inspector Title
	FDEP-SWD
	Organization
<hr/>	
Tony Piotrowski	Facility Manager
Representative Name	Representative Title
	Heritage Crystal Clean, LLC
	Organization

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

Report Approvers:

Approver: Shannon Kennedy	Inspection Approval Date: 01/09/2020
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CITY OF PLANT CITY

February 16, 2017

Mr. [Name],
[Address]
[City, State, Zip]

Dear Mr. [Name]:

Reference is made to your letter dated [Date] regarding [Subject]. The City of Plant City has reviewed your request and has determined that [Action].

Sincerely,
[Signature]
[Title]

FLORIDA DEPARTMENT OF ENVIRONMENTAL PROTECTION

STATEMENT OF WORK

FOR THE [Project Name]

PERIOD: [Start Date] TO [End Date]

1. [Section 1]

2. [Section 2]

3. [Section 3]

4. [Section 4]

5. [Section 5]

6. [Section 6]

7. [Section 7]

8. [Section 8]

9. [Section 9]

10. [Section 10]

FLORIDA DEPARTMENT OF ENVIRONMENTAL PROTECTION

1000 N. GULF BLVD.
TALLAHASSEE, FL 32304-3000

Phone: (904) 251-2000
Fax: (904) 251-2000
Website: www.dep.state.fl.us

Mr. [Name],
[Address]
[City, State, Zip]

Dear Mr. [Name]:

Reference is made to your letter dated [Date] regarding [Subject]. The Florida Department of Environmental Protection has reviewed your request and has determined that [Action].

Sincerely,
[Signature]
[Title]

FLORIDA DEPARTMENT OF ENVIRONMENTAL PROTECTION

STATEMENT OF WORK

FOR THE [Project Name]

PERIOD: [Start Date] TO [End Date]

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FLORIDA DEPARTMENT OF ENVIRONMENTAL PROTECTION

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FLORIDA DEPARTMENT OF ENVIRONMENTAL PROTECTION

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FLORIDA DEPARTMENT OF ENVIRONMENTAL PROTECTION

STATEMENT OF WORK

FOR THE [Project Name]

PERIOD: [Start Date] TO [End Date]

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8. [Section 8]

9. [Section 9]

10. [Section 10]

CITY OF PLANT CITY

1000 N. GULF BLVD.
TALLAHASSEE, FL 32304-3000

Phone: (904) 251-2000
Fax: (904) 251-2000
Website: www.dep.state.fl.us

Mr. [Name],
[Address]
[City, State, Zip]

Dear Mr. [Name]:

Reference is made to your letter dated [Date] regarding [Subject]. The City of Plant City has reviewed your request and has determined that [Action].

Sincerely,
[Signature]
[Title]

FLORIDA DEPARTMENT OF ENVIRONMENTAL PROTECTION

STATEMENT OF WORK

FOR THE [Project Name]

PERIOD: [Start Date] TO [End Date]

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FLORIDA DEPARTMENT OF ENVIRONMENTAL PROTECTION

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FOR THE [Project Name]

PERIOD: [Start Date] TO [End Date]

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FLORIDA DEPARTMENT OF ENVIRONMENTAL PROTECTION

STATEMENT OF WORK

FOR THE [Project Name]

PERIOD: [Start Date] TO [End Date]

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5. [Section 5]

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7. [Section 7]

8. [Section 8]

9. [Section 9]

10. [Section 10]

12 12 2019



12 12 2019

12 12 2019

1
HOURS OF OPERATION

Monday - Friday

7a.m. - 5 p.m.

12 12 2019



Crystal
Clean™

Tony Piotrowski
Field Services Supervisor

Heritage-Crystal Clean, LLC

105 S. Alexander Street
Plant City, FL 33563

(813) 754-1504 Office

(877) 938-7948 Toll Free

(407) 709-3600 Cell

tony.piotrowski@crystal-clean.com

www.crystal-clean.com

12 12 2019



12 12 2019



12 12 2019



12 12 2019



12 12 2019

GATX 80250

CAPY 29810 US GAL
CAPY 112843 L

AA 04 BR 05
36 00373 WMS
SPRD 0-3

12 12 2019



V851

Crystal Clean

1-800-366-5700

1993

1-800-366-5700

98

12 12 2019



12 12 2019



12 12 2019



12 12 2019



USED OIL
TANK C-3

PETROLEUM
CONTACT
WATER
TANK 82V

PETROLEUM
CONTACT
WATER
TANK 41V

12 12 2019



12 12 2019



SPILL

CABINET

12 12 2019



12 12 2019



Crystal
Clean

SPEED
LIMIT
5

SILSAN

12 12 2019



12 12 2019

Compresso Service
 John Simpkins
 Director - Field Services
 Operations Manager
 Phone: 352-843-5100
 Fax: 352-843-5100
 Email: johnsimpkins@intelwater.com

8	9	10	11	12	13	14
15	16	17	18	19	20	21
22	23	24	25	26	27	28
29	30	31				

INTEL WATER COMPANY
 HAPPY WATER - HAPPY PEOPLE
 WIMAUMA, FLORIDA

EMERGENCY CONTACT LIST

PERIOD 4, 2006 - PERMANENTLY POST

For all incidents, (spills, injuries, property loss/damage, auto accidents) immediately contact
 CHEMTREC: 800-424-9300 *1

BRANCH/HUB MANAGER
 Name: TONY PIOTROWSKI
 Cell #: 407-709-3600
 Home #: 863-397-9884

BACK-UP CONTACT
 Name: MIKE PETKOVICH
 Cell #: 224 242 0273
 Home #:

LOCAL EMERGENCY NUMBERS
 Fire: 813-757-9131
 Poison Control: 800-222-1222
 Immediate Medical Assistance: 911
 Immediate Medical Assistance: 911

THIS LOCATION'S EVACUATION MEETING AREA:
 END OF FRONT PARKING AREA

Always contact CHEMTREC first unless the emergency warrants the need for 911 assistance.

To obtain a new poster or update the current information, send an email to CC_EHS.

Revised: Period 4, 2006

CENTRAL FLORIDA GAS COMPANY
 2000 W. UNIVERSITY BLVD. SUITE 100
 WINTER FLORIDA 32789
 800-424-9300
 407-291-1000
 407-291-1001
 407-291-1002
 407-291-1003
 407-291-1004
 407-291-1005
 407-291-1006
 407-291-1007
 407-291-1008
 407-291-1009
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 407-291-1016
 407-291-1017
 407-291-1018
 407-291-1019
 407-291-1020

12 12 2019



HCC Oil Services Contaminated Material Action Plan

October 14, 2019

Tampa Oil Collection Truck # 961434 Analytical Received October 14, 2019

Background

On October 14, 2019 I was contacted by Tony Piotrowski (Plant City Operations Manager) and informed that one of the oil collection trucks (OSSR Sean Furtado) was tested and found to have a high halogen load over 1000 ppm. The load consisted of 1 collection totaling 249 gallons, the following customers contributed to the load:

Aymond Building Supply - 249 gallons – VSQG

All customer collections are from vehicular maintenance. All generator certifications have been completed.

Conclusion:

The material which contributed to the high halogen contamination in the collection truck was generated by a Very Small Quantity Generator.

If the Halogen contamination in the oil phase is from a halogenated solvent, it was received from a VSQG and therefore the tanker of oil can be managed as used oil.

Actions:

12 12 2019

October 16, 2012
Page 2

12/12/2019

It is recommended that the material be off-loaded into the tank farm at the Tampa offload site at Plant City. The Material can be managed as used oil.

Don Laney
Regional Sales Manager Vac. /Oil
Don.laney@crystal-clean.com
704.995.5737

From:
To:
Subject:

Piotrowski, Tony
Wednesday, October 16, 2019 8:51 AM
Saldana, Ana
Fwd: Tampa Action Plan Sean Furtado

12 12 2019

Sent via the Samsung Galaxy S8 Active, an AT&T 4G LTE smartphone

----- Original message -----

From: "Petkovich, Michael" <Michael.Petkovich@Crystal-Clean.com>
Date: 10/16/19 9:39 AM (GMT-05:00)
To: "Odom, Shane" <Shane.Odom@Crystal-Clean.com>, "Laney, Don" <Don.Laney@Crystal-Clean.com>
Cc: "Mefferd, Adam" <Adam.Mefferd@Crystal-Clean.com>, "Piotrowski, Tony" <Tony.Piotrowski@Crystal-Clean.com>
Subject: RE: Tampa Action Plan Sean Furtado

This action plan is approved. Please manage as non-haz oil.

Thanks,

MP

From: Odom, Shane <Shane.Odom@Crystal-Clean.com>
Sent: Wednesday, October 16, 2019 8:33 AM
To: Laney, Don <Don.Laney@Crystal-Clean.com>; Petkovich, Michael <Michael.Petkovich@Crystal-Clean.com>
Cc: Mefferd, Adam <Adam.Mefferd@Crystal-Clean.com>; Piotrowski, Tony <Tony.Piotrowski@Crystal-Clean.com>
Subject: RE: Tampa Action Plan Sean Furtado

EH&S approves action plan.

From: Laney, Don <Don.Laney@Crystal-Clean.com>
Sent: Wednesday, October 16, 2019 7:35 AM
To: Odom, Shane <Shane.Odom@Crystal-Clean.com>; Petkovich, Michael <Michael.Petkovich@Crystal-Clean.com>;
Laney, Don <Don.Laney@Crystal-Clean.com>
Cc: Mefferd, Adam <Adam.Mefferd@Crystal-Clean.com>; Piotrowski, Tony <Tony.Piotrowski@Crystal-Clean.com>
Subject: Tampa Action Plan Sean Furtado

Please review and approve action plan for Tampa.
Thanks,

Don Laney
Regional Sales Manager
Region 7
704.995.5737
don.laney@crystal-clean.com

HOUSE TRIGGERS

TO OPEN

105 S. Alexander Street
Plant City, FL 33563

Non-Conforming Load Log

Load Control #	Date	Tanks Locked Out	Description of Material	Quantity of Material	Generator Info	Final Disposition	
19-0001	01-11-19	V365	oil base TX 1893	490	multiple stops	Accepted	VSQG
19-0002	02-01-19	V007 FR	PH=10.4-10.8	2800 Gal	Duke Energy	Accepted	VSQG
19-0003	03-12-19	390 F	oil TX=1228 ppm	629 Gal	Gulf Harbor	Accepted	VSQG
19-0004	03-18-19	390 F	oil TX=2330 ppm	503 Gal	Portside Marine	Accepted	VSQG
19-0005	04-19-19	413 R	oil TX=12085 ppm	1920 Gal	multiple stops	Accepted	VSQG
19-0006	05-29-19	550	H ₂ O PH 12.5	7466 Gal	multiple stops	Accepted	VSQG
19-0007	07-10-19	413 Rear	oil TX 3053 ppm	1515 Gal	multiple stops	Accepted	VSQG
19-0008	10-14-19	434 Front	oil tx 1081 ppm	249 Gal	Almond Building	Accepted	VSQG

12 12 2019

on-Conforming Load Log

Quantity of Material	Generator Info	Final Disposition
490	multiple stop	Accepted
2800 Gal	Duke Energy	Accepted
629 Gal	Gulf Harbor	Accepted
503 Gal	Portside Marine	Accepted
1920 Gal	multiple stops	Accepted
7466 Gal	multiple stops	Accepted
1575 Gal	multiple stops	Accepted
249 Gal	Aymond Building	Accepted

July 15, 2019

**Tampa Oil Collection Truck # 961413
Analytical Received July 10, 2019**

12 12 2019

Background

On July 10, 2019 I was contacted by Tony Piotrowski (Plant City Operations Manager) and informed that one of the oil collection trucks (OSSR John Smith) was tested and found to have a high halogens load over 1000 ppm. The load consisted of 6 collection totaling 1525 gallons, the following customers contributed to the load:

Fed Ex #256036 - 300 gallons - VSQG
Toms Auto - 200 gallons - VSQG
A.P. Bell - 350 gallons - VSQG
Mike's Elite Towing and Auto - 100 gallons - VSQG
Steve's Auto Repair - 325 gallons - VSQG
Pit Stop Auto - 250 gallons - VSQG

All customer collections are from vehicular maintenance. All generator certifications have been completed.

Conclusion:

The material which contributed to the high halogen contamination in the collection truck was generated by a Very Small Quantity Generator.

If the Halogen contamination in the oil phase is from a halogenated solvent, it was received from a VSQG and therefore the tanker of oil can be managed as used oil.

July 15, 2019
Page 2

The material which contributed to the High PH came from A.P.Bell, this is a marina and they have salt water in their tank at times which can give a false reading for halogens.

actions:

It is recommended that the material be off-loaded into the tank farm at the Tampa offload site at Plant City. The Material can be managed as used oil.

aney
Regional Sales Manager Vac. /Oil
aney@crystal-clean.com
5 5727

12 12 2019

HCC Oil Services Contaminated Material Action Plan

April 19, 2019

**Tampa Oil Collection Truck # 961413
Analytical Received April 19, 2019**

Background

On April 19, 2019 I was contacted by Tony Piotrowski (Plant City Operations Manager) and informed that one of the oil collection trucks (OSSR John Smith) was tested and found to have a high halogens load over 1000 ppm. The load consisted of 5 collection totaling 1925 gallons, the following customers contributed to the load:

Bay Area Automotive - 585 gallons – VSQG
Galati – 200 gallons – VSQG
U.P.S. – 80 gallons – VSQG
LKQ Corp. – 400 gallons – VSQG
Mackinzie – 660 gallons - VSQG

All customer collections are from vehicular maintenance. All generator certifications have been completed.

Conclusion:

The material which contributed to the high halogen contamination in the collection truck was generated by a Very Small Quantity Generator.

If the Halogen contamination in the oil phase is from a halogenated solvent, it was received from a VSQG and therefore the tanker of oil can be managed as used oil.

12 12 2019

Background

On April 19, 2019 I was contacted by Tony Piotrowski (Piotrowski, Manager) and informed that one of the oil collected from the vehicle was tested and found to have a high halogens. The test consisted of 5 collection totaling 1925 gallons, which was then contributed to the load:

- Bay Area Automotive - 585 gallons - VSQG
- Galati - 200 gallons - VSQG
- U.P.S. - 80 gallons - VSQG
- LKQ Corp. - 400 gallons - VSQG
- Mackinzie - 660 gallons - VSQG

All customer collections are from vehicular emissions and all certifications have been completed.

105 S. Alexander Street
Plant City, FL 33563

Non-Conforming Load Log

Load Control #	Date	Tanks Locked Out	Description of Material	Quantity of Material	Generator Info	Final Disposition	Comments
18-0001	01-30-18	434 F	oil TX e. 1169 ppm	376 Gal	434 Front	Accepted	Resample TX e. 978 ppm
18-0002	02-08-18	Tank 24	H2O 2077 ppm	6761 Gal	Electrolab	Accepted	No Break water
18-0003	02-16-18	TCIX 25034	Low Flash 159°	23,867 Gal	Ft. Lauderdale	Accepted	Low Flash Oil
18-0004	02-16-18	WCHX 29351	Low Flash 156°	26,420 Gal	Atlanta	Accepted	Low Flash oil
18-0005	02-21-18	Gatx 30313	Low Flash 147°	25,007	Ft Lauderdale	Accepted	Low Flash oil
18-0006	02-23-18	V382R	oil TX e. 1261 ppm	300 Gal	Triest	Accepted	V.S.Q.G.
18-0007	03-21-18	Gatx 80632	Low Flash e. 136°	25,850 Gal	CESQG	Accepted	CESQG V.S.Q.G.
18-0008	03-26-18	CTCX 33706	Low Flash e. 154°	25,535 Gal	V.S.Q.G.	Accepted	V.S.Q.G.
18-0009	05-18-18	Gatx 80245	oil TX e. 1170 ppm	24,778 Gal	Concord	Accepted	CESQG
18-0010	05-21-18	391F	oil TX e. 1579 ppm	308 Gal	391F	Accepted	
18-0011	06-21-18	SHX 6440	oil TX e. 1184 ppm	24,622	Charlotte	Accepted	Approved.
18-0012	06-29-18	SANX 30022	oil TX 108 ppm	25,678	Charlotte	Accepted	Approved.
18-0013	07-6-18	GSTX 30019	oil TX 12,300 ppm	25,220	Charlotte	Accepted	Approved.
18-0014	07-06-18	GATX 30385	oil TX 15,260 ppm	25,007	Charlotte	Accepted	Approved.
18-0015	06-20-18	300	Low Flash 150°	1,350	300	Accepted	Approved.
18-0016	08-06-18	SHX 6471	oil TX e. 1211 ppm	24,065	Charlotte	Accepted	Approved.
18-0017	08-15-18	Gatx 54014	oil TX 2223 ppm	24,960	Charlotte	Accepted	Approved.
18-0018	08-15-18	SHX 64513	oil TX 1033 ppm	23,128	Charlotte	Accepted	Approved.
18-0019	08-15-18	SRI X 30205	oil TX 2032 ppm	24,237	Charlotte	Accepted	Approved.
18-0020	08-22-18	TAEX 2966	oil TX 1824 ppm	24,425 Gal	Charlotte	Accepted	Approved.
18-0021	08-29-18	V003	pH	2,060 Gal	V003	Accepted	Approved.
18-0022	09-07-18	V383R	oil TX 1333 ppm	900 Gal	Lane Constr.	Accepted	Approved CESQG
18-0023	09-14-18	390 Front	oil TX 1072 ppm	503 Gal	Rush Truckcenter	Accepted	V.S.Q.G. Approved.
18-0024	09-17-18	SHX 6471	oil TX 1625 ppm	21,291 Gal	Charlotte	Accepted	Approved.
18-0025	09-28-18	ACT	oil TX 1,096 ppm	—	—	—	Rejected
18-0026	09-26-18	Tank 24 H2O	H2O TX 1981 ppm	17,205 Gal	Tank 24	Accepted	Approved by Tom H.
18-0027	10-02-18	ACT	oil H2O TX 1,012 ppm	1,210 Gal	ACT	Accepted	Approved.
18-0028	10-04-18	SHX 6440	oil TX e. 1172 ppm	17,068 Gal	Charlotte	Accepted	Approved.
18-0029	10-05-18	V365	oil TX e. 1435 ppm	550 Gal	V365	Accepted	CESQG
18-0030	10-10-18	SANX 30000	oil TX e. 1683 ppm	19,475	Charlotte	Accepted	Approved.
18-0031	10-24-18	SRI X 30205	oil TX e. 1869 ppm	24,237	Charlotte	Accepted	Approved.
18-0032	10-24-18	SHX 205130	oil TX e. 2204 ppm	24,292 Gal	Charlotte	Accepted	Approved.
18-0033	10-24-18	WCHX 29338	oil TX 1,999 ppm	23,666 Gal	Charlotte	Accepted	Approved.
18-0034	10-30-18	Gatx 54014	oil TX e. 1639 ppm	23,667 Gal	Charlotte	Accepted	Approved.
18-0035	10-30-18	Gatx 2966	oil TX e. 1689 ppm	24,778 Gal	Charlotte	Accepted	Approved.
18-0036	10-01-18	TAEX 3811	oil TX e. 1262 ppm	25,843 Gal	Charlotte	Accepted	Approved.
18-0037	12-06-18	Gatx 30385	oil TX 1302 ppm	25,574	Charlotte	Accepted	Approved.

15
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Action Plan
12 12 2019

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flash point of 74
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ow flash on the railcar

Non-Conforming Load Log

Site	Tanks Locked Out	Description of Material	Quantity of Material	Generator Info	Final Disposition	Comments
10-18	434 F	Oil TX=1169 ppm	376 Gal	434 Front	Accepted	Resample TX @ 97
8-18	Tank 24	H2O 2077ppm	670 Gal	Electrolab	Accepted	NO Break water
2-18	TCIX 25024	Low Flash 159°	23,867 Gal	FT Lauderdale	Accepted	Low Flash Oil
2-18	NICHX 29251	Low Flash 156°	26,420 Gal	Atlanta	Accepted	Low Flash Oil
1-18	GATX 30313	Low Flash 142°	25,007	FT Lauderdale	Accepted	V.S.G.
3-18	V383 R	Oil TX=1261 ppm	300 Gal	Franklin Triest	Accepted	ESOG V.S.G.
1-18	GATX 80633	Low Flash e. 136°	25,850 Gal	CESAG	Accepted	V.S.G.
10-18	CTCX 33306	Low Flash e. 151°	25,535 Gal	V.S.G.	Accepted	V.S.G.
2-18	Gatx 80245	Oil TX=170 ppm	24,778 Gal	Concord	Accepted	CESAG
1-18	391 F	Oil TX=1579 ppm	308 Gal	391 F	Accepted	Approved.
1-18	SHOX 6440	Oil TX=1184 ppm	24,622	Charlotte	Accepted	approved.
2-18	SANX 30200	Oil TX 1018 ppm	25,678	Charlotte	Accepted	approved.
1-18	GSTX 30019	Oil TX 1230 ppm	25,220	Charlotte	Accepted	approved.
1-18	GATX 30385	Oil TX 1526 ppm	25,007	Charlotte	Accepted	approved.
1-18	300	Low Flash 156°	1350	300	Accepted	approved.
5-18	SHAX 6471	Oil TX=1211 ppm	24,065	Charlotte	Accepted	Approved.
1-18	GATX 54014	Oil TX 2223 ppm	24,960	Charlotte	Accepted	Approved.
1-18	SHPX 205130	Oil TX 1033 ppm	23,128	Charlotte	Accepted	Approved.
1-18	SRPX 30205	Oil TX 2033 ppm	24,237	Charlotte	Accepted	Approved.
1-18	TAEX 2966	Oil TX 1824 ppm	24,425 Gal	Charlotte	Accepted	Approved.
1-18	V003	PH	2,060 Gal	V003	Accepted	Approved. EESG
7-18	V383 R	Oil TX 1333 ppm	900 Gal	Lane Constr.	Accepted	Approved. EESG
8-18	390 Front	Oil TX 1072 ppm	503 Gal	Rush Truck center	Accepted	V.S.G. Approved
9-18	SHOX 6471	Oil TX 1625 ppm	21,291 Gal	Charlotte	Accepted	Approved.
1-18	ACT	Oil TX 1,091 ppm	---	---	---	Rejected
1-18	Tank 24	H2O TX 1981 ppm	17,205 Gal	Tank 24	Accepted	Approved by TO
1-18	ACT	Oil TX 1,012 ppm	1,210 Gal	ACT	Accepted	TK7 approved.
1-18	SHOX 6440	Oil TX=1172 ppm	17,068 Gal	Charlotte	Accepted	Approved.
1-18	V365	Oil TX=1435 ppm	550 Gal	V365	Accepted	CESAG
8-18	SATX 30000	Oil TX=1683 ppm	19,475	Charlotte	Accepted	Approved
1-18	SKIX 30205	Oil TX=1809 ppm	24,237	Charlotte	Accepted	Approved.
1-18	SHX 205130	Oil TX=2204 ppm	21,292 Gal	Charlotte	Accepted	Approved.
8-18	WIX 29338	Oil TX 1999 ppm	23,667 Gal	Charlotte	Accepted	Approved.
8-18	Gatx 54014	Oil TX=1639 ppm	23,667 Gal	Charlotte	Accepted	Approved.
1-18	GATX 29672	Oil TX=1689 ppm	27,778 Gal	Charlotte	Accepted	Approved.
7-18	TAEX 3011	Oil TX=1262 ppm	25,843 Gal	Charlotte	Accepted	Approved.
1-18	GATX 30385	Oil TX 1302 ppm	25,574	Charlotte	Accepted	Approved.

12 12 2019

Driver:

Truck# Tank 24

Customer Name	Sets off sniffer	TX result	%H2O	Hydrochlor Result	CESQS	GC Results
No Break H2O		2077 ppm	98%			

Hydrochlor results must be corrected for water content as follows:
 $1 + \frac{(100 - \%H_2O)}{100}$ x Hydrochlor reading = true concentration (ppm)

Comments: No Break water Accepted

Tested by: *AMA*

Contaminated Material Action Plan

February 26, 2018

Plant City Tank 24 – High Chlorine

Background

On February 8, 2018, the Plant City Facility Manager received notification from the Indianapolis laboratory that the tank release for T-24 (no break water) was high in chlorine.

After review of the tank transfer log indicated that three customers (Electro Lab, Tire's Plus #744004 and Manatee Harley Davidson) contributed to the tank and provided the potential source of the contamination.

After review of the customers' generator status, two of the customers (Tire's Plus and Manatee Harley Davidson) were identified as VSQGs and the other (Electro Lab) was identified as an SQG/LQG. The retained sample for both the front and rear compartment from Electro Lab were sent to Indianapolis for solvent scan to determine the presence of solvent. The front compartment was cleared while the rear compartment retained sample did not have enough used oil to perform a solvent scan. The remaining retained sample of the rear compartment was sent to a local lab for solvent scan. The results were received (see attached) and after review by the Indianapolis Lab Manager, it was determined that there was no level of solvent present in large enough quantities to indicate that the material was contaminated with solvent.

Conclusion:

The material which contributed to the high halogen contamination in the collection truck was either from a VSQG or was from a chlorine interference (brine water) other than solvent.

12 12 2019

If the Halogen contamination in the oil phase is from a halogenated solvent, it was received from a VSQG and therefore the tank can be managed as such.

12 12 2019

Actions:

It is recommended that the material be managed as Used Oil and transferred to the process at Plant City with approval from EHS. The Material can be managed as used oil.

Thomas G. Hillstrom
Vice-President, Strategic Operations and Acquisitions

HCC Oil Services Contaminated Material Action Plan
Feb. 19, 2018 Ft. Lauderdale Oil Rail Car TCIX025034

Analytical Received February 16, 2018

Background:

On Feb.16, 2018 I was contacted by Tony Piotrowski, Plant City facility manager, and informed that the Ft. Lauderdale TCIX025034 was tested and found to have a flash point of 159 degrees. This rail car contained 66 customers for a total of 23,876 gallons of oil that contributed to this load. Generator Retain sample were taken at all customer locations at the time of service.

Generator certification are on file: Rail car report attached:

Armellini Express Lines – 300 gallons – VSQG
Easy Pay Tire Shop – 250 gallons – VSQG
Budget Car Care – 275 gallons – VSQG
Ricken Backer Marina Inc. – 250 gallons – VSQG
E&L Transportation – 225 gallons – VSQG
Michael Rybovich & Sons Boat Works – 300 gallons – VSQG
Ryan Inc. – 420 gallons – VSQG
Fleet Tire Truck & Auto Center – 280 gallons - VSQG

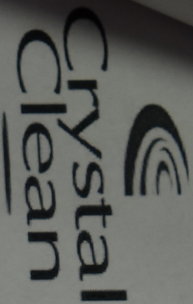
Conclusions:

A Waft Test was performed on samples and the above retain sample's had a fuel smell. The Material which contributed to the Low Flash contamination in the rail car was generated by a Very Small Quantity Generator. The rail car was transported from the Ft. Lauderdale facility to the Plant City facility un-placarded and should have been placard

UN 1993, flammable liquid, n.o.s. recycled fuel oil, 3, PGI the OSSR's should have recognized in the field that this product should not be transported as NON DOT REGULATED MATERIAL. The Low Flash material was generated by a VSQG Very Small Quantity Generator.

Action:

12 12 2019



The customer's will be visited and informed of the low flash results in the oil and educated on what is acceptable as "Used Oil" along with information of the additional disposal cost associated with disposal. The customer will also need to segregate the Oil from any other contaminants prior to any further services. The OSSR's will receive training/counseling to insure that he does not pick up flammable materials again. The Material can be managed as used oil.

This material will be held in the rail car the Plant City location until direction from Operations is provided.

Don Laney

Regional Sales Manager Oil/Vac.

Region 7

704.995.5737

don.laney@crystal-clean.com

12 12 2019

HCC Oil Services Contaminated Material Acton Plan
March 26, 2018 Atlanta Oil Rail Car GATX080632

Analytical Received March 21, 2018

Background:

On March 21, 2018 I was contacted by Tony Piotrowski, Plant City facility manager, and informed that the Atlanta GATX080632 railcar was tested and found to have a flash point of 136 degrees. This rail car contained 51 customers for a total of 25,850 gallons of oil that contributed to this load. Generator Retain sample were taken at all customer locations at the time of service.

Generator certification are on file; Rail car report attached:

Higgins Ford performance – 300 gallons – VSQG
Blue Moon Automotive Service Co. – 200 gallons – VSQG

Conclusions:

A Waft Test was performed on samples and the above retain sample's had a fuel smell. The Material which contributed to the Low Flash contamination in the rail car was generated by a Very Small Quantity Generator. The rail car was transported from the Atlanta facility to the Plant City facility un-placarded and should have been placard

UN 1993, flammable liquid, n.o.s. recycled fuel oil, 3, PGII the OSSR's should have recognized in the field that this product should not be transported as NON DOT REGULATED MATERIAL. The Low Flash material was generated by a VSQG Very Small Quantity Generator.

Action:

The customer's will be visited and informed of the low flash results in the oil and educated on what is acceptable as "Used Oil" along with information of the additional disposal cost associated with disposal. The customer will also need to segregate the Oil from any other contaminates prior to any further services. The OSSR's will receive training/counselling to insure that he does not pick up flammable materials again.
The Material can be managed as used oil.

12 12 2019

Facility _____
Date: _____

OFFICE USE ONLY

Generator #: _____



HCC

HERITAGE-CRYSTAL CLEAN, LLC GENERATOR CERTIFICATE

Blue Moon Automotive Service Co
(Customer)

Customer's EPA ID

513 Glover St.
(Address)

Customer's State

Marietta Ga. 30060
(City) (State) (Zip Code)

770

THIS FORM IS DEEMED PART OF THE ABOVE REFERENCED SERVICE AGREEMENT BETWEEN IDENTIFIED CUSTOMER AND ALL TERMS AND CONDITIONS AND CERTIFICATIONS CONTAINED THEREIN.

ALL SERVICES

Conditionally Exempt Small Quantity Generator (CESQG) (or state equivalent)

The Customer hereby certifies that it qualifies as a Conditionally Exempt Small Quantity Generator by generating, accumulating, or transporting less than one kilogram of characteristic (D codes), F, K, or U-listed hazardous waste during a calendar month, and less than one kilogram of acute hazardous waste during a calendar month.

The Customer also certifies that no more than 1,000 kilograms of characteristic F, K, or U-listed hazardous waste was accumulated on-site at any one time during a calendar month. The Customer will inform HCC if more than one kilogram of acute hazardous waste is accumulated on-site at any one time during a calendar month.

Generator Does NOT Qualify as Conditionally Exempt Small Quantity Generator
The Customer hereby certifies that it qualifies as:

12 12 2019

USE ONLY

Generator #: _____



HERITAGE-CRYSTAL CLEAN GENERATOR CERTIFICATE

Higgins Fuel Performance
(Customer)

Customer

8799 A Gursley Rd
(Address)

Customer

Douglasville, GA
(City)

(State)

30134
(Zip Code)

THIS FORM IS DEEMED PART OF THE ABOVE REFERENCED SERVICE AGREEMENT IDENTIFIED CUSTOMER AND ALL TERMS AND CONDITIONS AND CERTIFICATIONS

ALL SERVICES

Conditionally Exempt Small Quantity Generator (CESQG) (or state)

The Customer hereby certifies that it qualifies as a Conditionally Exempt Small Quantity Generator characteristic (D codes), F, K, or U-listed hazardous waste during a calendar month, and less than one kilogram of acute hazardous waste during a calendar month.

The Customer also certifies that no more than 1,000 kilograms of characteristic F, K, or U-listed hazardous waste was accumulated on-site at any one time during a calendar month. The Customer will inform HCC if more than one kilogram of acute hazardous waste is accumulated on-site at any one time.

12 12 2019

DATE	11/27/18	TIME	10:00 AM
TANK NUMBER	11017	LIQUID LEVEL	VARIED
CAPACITY	1.49 Mil/Gal	TEMP	AMBIENT *F

WEATHER STRIPPING OR FLASHING	
ARE ALL PIECES TIGHT AGAINST SHELL	OK
ARE ANY PIECES MISSING OR REQUIRE REPAIRS	NONE
IF SO, HOW MANY	N/A

HOSES AND PIPING	
GENERAL APPEARANCE OF HOSES	
ANY LEAKS	NONE
ABOVEGROUND PIPING FREE OF LEAKS	IF SO, EXPLAIN
	YES

CONTAMINATION	
IS ROOF FREE OF OIL AND WATER	YES
IF NOT, INDICATE THE PERCENT COVERAGE OF EACH LIQUID AND THE DEPTH AT THE WORSE LOCATION OR ATTACHED DRAWING	NONE

CORROSION CONTROL	
NOTE GENERAL APPEARANCE OF PAINT ON SHELL, ROOF, LADDER AND STRUCTURAL MEMBERS	GOOD
IS RUSTING OR PITTING OCCURRING ON ANY OF THE ABOVE	NONE
IF YES, EXPLAIN WHERE AND IF REPAIRS ARE NEEDED IMMEDIATELY	NA
ARE ALL INSULATING FLANGE WASHERS AND SLEEVES IN PLACE	YES
IF MISSING, CRACKED OR BROKEN, EXPLAIN WHERE AND THE REPAIRS NEEDED	NONE
ARE ALL GROUND AND/OR ALL STRAPS IN PLACE	YES
IF MISSING OR DAMAGED, INDICATE LOCATION ON DRAWING AND EXPLAIN REPAIRS NEEDED	NONE

12/12/2019

ARE HIGH LEVEL ALARMS FUNCTIONING PROPERLY	NA	TESTED TO VERIFY	NA
--	----	------------------	----

OTHER OBSERVATIONS-NOTE ANYTHING THAT MIGHT AFFECT SMOOTH MOVEMENT OF ROOF AND ANY PROBLEMS THAT WOULD ALLOW VAPORS OR AIR POLLUTION
NONE

DRIVER Seuf DATE 12-3-19

TRUCK # 44434

FRONT TANK

INCHES 48

WATER ✓

GALLONS 832

FUEL ✓

019112

ATF 832

REAR TANK

INCHES 49"

WATER ✓

GALLONS 3052

FUEL ✓

ATF

YARD TECH

DRIVER

019112

3187

Total Sales : \$0.00
Total Payments : \$13.00
Net Payments : \$13.00

12 12 2019

ai HOLLAND PUMP(416920)
2573 Willard Street
FORT MYERS, FL, 33901
Work Order Number :
Manual Doc Number :

PRODUCT all
n 40 306C (Used Oil Pick)
ials 1 WS#: 10-54 (305/306/1101 - USED)
e, w 310 (Trip Fee - Use)
Total Sales : \$0.00
Net Payments : \$0.00

VALVOLINE INSTANTI OIL CHANGE
3430 Forum Blvd
FORT MYERS, FL, 33905
Work Order Number : 00-
Manual Doc Number :

PRODUCT 316 (BSSM) 27
WS#: 10-54 (305/306/
310 (Trip Fee - Use)
306 (Used Oil Serv)
WS#: 10-54 (305/300/

Interval: 1 week
Next Service Date

Page 13

Total Sales : \$0.00
Total Payments : \$13.00
Net Payments : \$13.00

PRODUCT SUMMARY
TRIP FEE - U

WS#: 10-54 (305/306/1101 - USED OIL)

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310 (Trip Fee - Use)	1	\$0.00	\$0.00
306 (Used Oil Servi)	570	\$0.29	\$165.30
WS#: 10-54 (305/306/1101 - USED OIL)			

Interval: 1 Week(UPDATED)
Next Service Date: 12/4/2020(UPDATED)

Total Sales : \$0.00
Total Payments : \$165.30
Net Payments : \$165.30

PRODUCT SUMMARY:

TRIP FEE - USED OIL SERVICE - 310 : \$0 (9)

MATERIAL SUMMARY:

USED OIL PICKUP - CHARGE - 306C : \$0 (1090 gallons)
 USED OIL SERVICE - 306 : \$207.3 (1910 gallons)
 BS&W - 316 : \$0 (87 gallons)
 USED ANTIFREEZE - 304 : \$0 (100 gallons)
 GASOLINE PICKUP - CHARGE - 311C : \$83.2 (832 gallons)

9

832
100
3087
FAO

Total Gallons: 4019 Total Payments: \$207.3 Total Charges: \$83.2

Manual Doc Number :

PRODUCT	QTY	PRICE	SUBTOTAL
306 (Used Oil Servi)	445	\$0.00	\$0.00
WS#: 10-54 (305/306/1101 - USED OIL)			
310 (Trip Fee - Use)	1	\$0.00	\$0.00
316 (Bs&W)	19	\$0.00	\$0.00
WS#: 10-54 (305/306/1101 - USED OIL)			

Total Sales : \$0.00
 Net Payments : \$0.00

GARDEN STREET IRON & METAL(292486)

3350 Metro Parkway
 FORT MYERS, FL, 33916
 Work Order Number : 00-00DW4DN
 Manual Doc Number :

**** POSSIBLE DUPLICATE WORK ORDER ****

PRODUCT	QTY	PRICE	SUBTOTAL
310 (Trip Fee - Use)	1	\$0.00	\$0.00
316 (Bs&W)	15	\$0.00	\$0.00
WS#: 10-54 (305/306/1101 - *USED OIL)			
304 (Used Antifreez)	100	\$0.00	\$0.00
Interval: 1 Week(UPDATED)			
Next Service Date: 12/4/2020(UPDATED)			
306 (Used Oil Servi)	290	\$0.10	\$29.00
WS#: 10-54 (305/306/1101 - USED OIL)			

Total Sales : \$0.00
 Total Payments : \$29.00
 Net Payments : \$29.00

GARDEN STREET IRON & METAL(292486)

3350 Metro Parkway
 FORT MYERS, FL, 33916

12 12 2019

Permittee shall comply
 CP and all revisions
 of the CP must be
 provided the entity has the
 within thirty days of receipt
 Permittee shall amend the
 or changes to the plan
 change. All amendments
 priorities in Part II.A.3
 Permittee shall con

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**HERITAGE-CRYSTAL CLEAN, LLC
STRAIGHT BILL OF LADING
ORIGINAL - NOT NEGOTIABLE**



Shipping Report #: 120519-1
Release #: 40758

Page 1 of 1

Date: 12/15/19

Shipper: HCC Crystal-Clean East (Plant City)
Ship From: HCC Crystal-Clean East (Plant City)

Shipper Info.: HCC Crystal-Clean East (Plant City)

Address: 105 S Alexander St
City: Plant City
State: FL
Zip: 33563

Ship-to Info.: Mosaic 4 Corners

Address: 11200 US HWY 37 South
City: Bradley
State: FL
Zip: 33835

Route:

Origin Switch Route:

Destination Switch Route:

Vessel #: 554

Customer or HCC Vessel

Vessel Capacity (USG/lbs.): 7500

Inches Measurement: N/A

24HR EMERGENCY - 1-800-424-9300, "1"

DESCRIPTION *		WEIGHT and/or GALLONS
Contains: NON DOT REGULATED RECYCLED FUEL OIL		Gross USG: 31.0 / 7.251
Admin Contact:		Temp.:
Rate Authority:		Temp, Adj.:
Party to Receive Freight Bill:		Net USG: 7271 GALS @ .86
Sales Order No.: DEC_PO# F34104422		Gross lbs.: 80080
Sales Order Contract No.:		Tare lbs.: 27360
Purchase Order Contract No.:		Net lbs.: 52720
SEAL NUMBERS:		Weighted by: ANTHONY PEREZ
If charges are to be prepaid, write or stamp here, "To be Prepaid" or "collect"		
Notes/Comments and Special Instructions: Customer pays off of service order		

*This is to certify that the above-named materials are properly classified, described, packaged, marked and labeled and are in proper condition for transportation according to the applicable regulations of the Department of Transportation.

The property described above, in apparent good order, except as noted (contents and condition of packages unknown), marked, consigned, and destined as indicated above, which said carrier (the word carrier being understood throughout this contract as meaning any person or corporation in possession of the property under the contract) agrees to carry to its usual place of delivery at said destination, if on its route, otherwise to deliver to another carrier on the route to said destination. It is mutually agreed, as to each carrier of all or any said property, that every service to be performed hereunder shall be subject to all the terms and conditions of the Uniform Domestic Straight Bill of Lading set forth (1) in Official, Southern, Western and Illinois Freight Classification in effect on the date hereof, if this is a rail or a rail-water shipment, or (2) in the applicable motor carrier classification or tariff if this is a motor carrier shipment.

Shipper hereby certifies that he is familiar with all the terms and conditions of the said bill of lading, including those on the back thereof, set forth in the classification or tariff which governs the transportation of this shipment, and the said terms and conditions are hereby agreed to by the shipper and accepted for himself and his assigns.

Shipper: HCC Crystal-Clean East (Plant City) TONY PIOTROWSKI
Printed/Typed Name: TONY PIOTROWSKI
Signature: Signature
Date: 12/15/19 Date

Tractor 1 Acknowledgement of Receipt Materials:
Printed/Typed Name: Signature
Date: 12/15/19 Date

Receiving Facility Owner or Operator:
Printed/Typed Name: Signature
Date: 12/15/19 Date

12 12 2019

12-5-19
 Heritage-Crystal Clean
 120519-1
 Four Corners

CERTIFIED ANALYSIS

Project ID:
 Site Address:
 Sample Time:
 Sample Date:
 Matrix:
 Sample Location:

Finished Product
 Plant City
 0940
 11/22/19
 Oil
 Tank C2

Company Name:
 Company Address:
 City, State, Zip:
 Phone:
 Report Date:
 Sampled By:

Heritage-Crystal Clean
 105 South Alexander Street
 Plant City, FL 33563
 813-708-1799
 11/27/19
 Jesus Valencia

Parameter	Method	Results / Initials	Analysis Date	Prep Date	Units	MDL	PQL	Dilution Factor	Regulatory Limit
Viscosity	Visgage	175 AS	11/26/19	11/26/19	SSU@100°F	10	N/A	1	N/A
Flash Point	EPA 1010	255 *	11/25/19	11/25/19	°F	N/A	N/A	1	>100°F
API Gravity	D287	31.0 AS	11/26/19	11/26/19	N/A	0	N/A	1	N/A
Percent Water	D95	0.2 AS	11/26/19	11/26/19	%	0.1	N/A	2	N/A
Percent Ash	D482	0.8351 AS	11/26/19	11/26/19	%	0.01	N/A	1	N/A
Total Halides	EPA 325.2	324 *	11/26/19	11/26/19	mg/kg	59.7	398	199.16	1000
Percent Sulfur	D4294-03	0.2061 AS	11/26/19	11/26/19	%	0.05	0.05	1	N/A
PCB's Aroclor 1016	EPA 8082	2.00 U*	11/25/19	11/25/19	mg/kg	2.00	5.00	1	2
PCB's Aroclor 1242	EPA 8082	2.00 U*	11/25/19	11/25/19	mg/kg	2.00	5.00	1	2
PCB's Aroclor 1254	EPA 8082	2.00 U*	11/25/18	11/25/19	mg/kg	2.00	5.00	1	2
PCB's Aroclor 1260	EPA 8082	2.00 U*	11/25/19	11/25/19	mg/kg	2.00	5.00	1	2
Pounds per gallon	CALC	7.251 AS	11/26/19	11/26/19	Lbs/gal	N/A	N/A	N/A	N/A
BTU per gallon	CALC	142,482 AS	11/26/19	11/26/19	BTU/gal	N/A	N/A	N/A	N/A
Arsenic	EPA 6010	0.690 U*	11/26/19	11/26/19	mg/kg	0.690	2.50	1	5
Cadmium	EPA 6010	0.100 U*	11/26/19	11/26/19	mg/kg	0.100	0.250	1	2
Chromium	EPA 6010	0.250 U*	11/26/19	11/26/19	mg/kg	0.250	0.500	1	10
Lead	EPA 6010	3.87 *	11/26/19	11/26/19	mg/kg	0.130	0.250	1	100
BTEX	EPA 8260	460 *	11/26/19	11/26/19	mg/kg	106	120	4000	N/A

* Analysis performed by Phoslab Environmental (Lakeland, Florida)

BTEX levels = Below Contracted Maximum
 I = Value is between the MDL and the PQL

PQL = Practical Quantitation Limit

ND = Analyte was analyzed for but not detected above reporting limit

U = Under the minimum detection limit

Ana Saldana
 Ana Saldana - Lab Technician

Anthony Piotrowski
 Anthony Piotrowski - Facility Manager

12-5-2019
 The regulatory limit above reflects the Federal EPA limit for on-specification fuel as defined in 40 CFR 279.11. The on-specification limit for PCB's is imposed by 40 CFR 761.20 (e). These regulatory limits may be less stringent than those required by site-specific permit requirements that may be held by the consumer. Please reference any applicable permits prior to acceptance of this material to ensure compliance.