

LAW OFFICES
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April 16, 2020

Via Electronic Mail

Jason Andreotta, Director
Florida Department of Environmental Protection
Southeast District – West Palm Beach
3301 Gun Club Road, MSC 7210-1
West Palm Beach, FL 33406

Re: World Petroleum Corp.
EPA ID No.: FLD980709075
Warning Letter WL#20-00009HW06SED

Dear Mr. Andreotta:

I represent World Petroleum Corp regarding the referenced matter. On January 21, 2020 the Florida Department of Environmental Protections (hereinafter “Department” or “DEP”) issued a Warning Letter to World Petroleum Corp. (“WPC”) as a result of a routine compliance evaluation inspection on October 31, 2019. In response, a teleconference with representatives of the Department and WPC to was conducted on April 2, 2020 to discuss alleged violations of Department rules related primarily to the alleged storage of hazardous waste in violation of the 24-hour storage limit and WPC acting as an unpermitted Hazardous Waste Treatment, Storage, and Disposal Facility, and subsequently the Department also provided a penalty demand. On behalf of WPC I am providing the following response to the penalty demand.

Background

WPC is a small family business that has been operating since 2002 engaged in the collection, transport, storage and processing of used oil and oily wastewater and other products. At the Davie, Florida facility, containers of hazardous waste are picked up and transported by WPC for disposal in accordance with the standards specified in 62-730.171, F.A.C.

As part of its business, WPC is a licensed hazardous waste transporter and has the occasion to receive hazardous waste, most in 55-gallon drums from automobile dealerships. The most common waste codes anticipated are Characteristic wastes with codes: D001 (Ignitable), D002 (Corrosive), D007 (Chromium), and D008 (Lead).

The alleged violations in this case are for the most part denied by WPC. While there were four identified occasions that hazardous waste was not delivered to Stericycle for disposal within 24 hours of receipt by WPC, on all of those occasions the waste was in 55-gallon drums that were never removed from the vehicle, that left the facility each day while additional drums were received, never remained in the facility for more than 24 hours on any occasion and therefore remained in transport. Transporters accepting hazardous waste from a generator or another transporter may need to hold waste temporarily during the normal course of transportation. A transfer facility is defined as any transportation-related facility, such as loading docks, parking areas, storage areas, and other similar areas where shipments are temporarily held. That was the case in each of the four occasions identified by the Department.

On another occasion it was determined that WPC exceeded the applicable period by 23 days and was therefore subject to the permitting requirements for a hazardous waste storage facility. This violation was inadvertent as the driver of the vehicle received the waste on the west coast of Florida and became ill with something unrelated to WPC business. Unfortunately, after he parked the vehicle at the WPC facility, the vehicle holding the waste remained within the facility until it was discovered that the waste was never delivered to the disposer. Upon learning that the vehicle still had the waste on board, the waste was immediately transported to Stericycle for disposal.

One of the issues that WPC has had to deal with relating to the transportation of the hazardous waste to the disposal facility is that Stericycle has one person serving as the contact to WPC, and on some occasions they are not responsive to the requests of WPC as to availability to accept the waste. This has on occasion delayed the ability of WPC to immediately transport the waste to Stericycle. As a result, WPC has since added another disposal facility to its vendor list.

As a result of the inspection and the findings of the Department, WPC has altered its SOP as it relates to the transportation of hazardous waste to ensure that the hazardous waste is not stored at the facility for any duration in excess of 24 hours. In addition, WPC has applied for a permit to be a hazardous waste transfer facility and will ensure that hazardous waste is not stored more than 10 days and that WPC will meet all of the requirements under 40 CFR 263 and 62-710 F.A.C. for hazardous waste transporters.

Proposed Penalties

WPC asserts that the imposition of the proposed penalties is not only excessive but also unjustified. Penalties are unjustified pursuant to the Department's own settlement guidelines for civil and administrative penalties ("Settlement Guidelines"). As acknowledged in the Settlement Guidelines, the imposition of a penalty is an enforcement tool that is intended to ensure immediate and continued compliance. Specifically, the Settlement Guidelines state that "penalties should be considered in those cases in which it is determined that penalties are needed

Mr. Jason Andreotta
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to ensure that the responsible party and others similarly situated will be deterred from future non-compliance.” The Settlement Guidelines further provide examples of when penalties are appropriate. In one example, DEP notes that a penalty is not warranted and would not provide a deterrent effect where a first-time violator acknowledged the mistake and was willing to correct any problems created by the violation. In contrast, DEP explained that a penalty may be appropriate for a first time violator who knew or had reason to know that the actions were illegal, who refused to correct the problem they created, or whose violation resulted in harm to the public or environment.

WPC’s actions are analogous to the first example referenced above. Imposition of a penalty under the instant facts is unjust and will not serve the purpose and intent expressed in the Settlement Guidelines. WPC believed that as long as the hazardous waste remained on the vehicle that it was considered to be in transit and not waste that was being stored. WPC was therefore unaware of the violation and immediately sought to come into compliance through an amendment to its Standard Operating Procedures, a copy of which is attached. as described above and has filed for a permit to act as a hazardous waste transfer facility to prevent these alleged violations from occurring in the future. Nevertheless, even though WPC was unaware that it may have been acting as a transfer facility its standard management and operating practices ensured that the waste was managed appropriately and safely. WPC’s employees are trained to safely manage and handle hazardous waste and WPC routinely conducts quality management system training, safety equipment and personal protection equipment training, hazardous material training, and conducts quarterly management and safety reviews. Most importantly, there was no environmental impact or harm resulting from the alleged violations, and as a result, if a penalty is determined to be appropriate, the penalty determination should be classified as minor across the board. So, while WPC was unaware that there was a potential violation when it was unable to timely deliver the waste to the disposal facility, the waste was safely managed and handled throughout the relevant time period. Another consideration for mitigation of the penalties in addition to immediate efforts at compliance is that WPC alleged violation was unknown, and therefore, not for any purposes of obtaining some economic gain from noncompliance.

For the foregoing reasons, WPC does not believe that the imposition of penalties is warranted in this matter.

Respectfully submitted,

MICHAEL B. MANES, P.A.

A handwritten signature in blue ink, appearing to read "Michael B. Manes", with a stylized flourish at the end.

Michael Manes

MBM/dbm

Enc.: Transfer Station Application and Revised SOP



April 15, 2020


DEP Waste Management Division-HWRS MS4560
2600 Blair Stone Rd
Tallahassee, FL 32399-2400
(850) 245-8707

Certified Mail: 7014 2120 0000 2616 3221

RE: World Petroleum Corp Hazardous Waste Transfer Facility Application

This Notification 8700-12FL Hazardous Waste Transfer Facility application
is being submitted at the request of Florida Department of Environmental Protection,
Southeast District - West Palm Beach.

Regards,



Andrea Miranda
World Petroleum Corp
954-327-0724

7014 2120 0000 2616 3221

U.S. Postal Service™
CERTIFIED MAIL® RECEIPT
Domestic Mail Only

For delivery information, visit our website at www.usps.com®.

TALLAHASSEE, FL 32399

Postage	\$3.55
Certified Fee	\$2.85
Return Receipt Fee (Endorsement Required)	\$0.00
Restricted Delivery Fee (Endorsement Required)	\$0.00
	\$2.20
Total Postage & Fees	\$8.60

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Postmark
Here

04/15/2020

Sent To

FL DEP

Street & Apt. No.
or PO Box No.

2600 Blair Stone Rd MS-4560

City, State, ZIP+4

Tallahassee FL 32399

PS Form 3800, July 2014

See Reverse for Instructions



8700-12FL - FLORIDA NOTIFICATION OF REGULATED WASTE ACTIVITY

DEP Waste Management Division-HWRS, MS4560
2600 Blair Stone Rd. Tallahassee, FL 32399-2400
(850) 245-8707

Date Received
(for FDEP Official Use Only)

EPA ID:

F L D 9 8 0 7 0 9 0 7 5

Please use the instructions document to complete this form
* mandatory fields

1. Reason for Submittal: (all submitters must complete pages 1 and 2 and sign page 7. Pages 3 through 6 - complete as applicable)

Mark 'X' in
the correct box*:

☐ To obtain a new EPA ID number (for hazardous waste, universal waste, used oil activities, or PCW activities).

(must choose one
if a notification)

☒ To provide updated information for an EPA ID number (to update status and facility identification information).

☐ To provide the final information for an EPA ID number (closing). (see instructions—must complete pages 1, 2, 3, 7)

☐ To obtain new or updating an EPA ID number for conducting Electronic Manifest Broker activities.

☐ Submitting new or revised notification for Part A for permitted facilities.

FL Registration(s)

☐ UW Mercury (see page 4)

☐ HW Transporter (see page 5)

☐ Used Oil (see page 6)

2. Facility or Business Name*:

WORLD PETROLEUM CORP

3. Facility Physical Location Information: (No P.O. Boxes)

Physical Street Address*:

3650 SW 47TH AVE

☐ Vessel

City or Town:

DAVIE

State:

FL

Zip Code:

33314

County*:

BROWARD

Country (if not USA)*:

USA

4. Facility or Business Mailing Address:

☐ Same address as #__ above or*:

4100 SW 47 AVE

City or Town*:

DAVIE

State*:

FL

Zip/Postal Code*:

33314

Country (if not USA):

USA

5. Facility North American Industry Classification System (NAICS) Code(s)*: (at least 5 digits)

A. | 3 | 2 | 4 | 1 | 9 | 1 | (required)

B. | 5 | 6 | 2 | 9 | 1 | 0 |

C. | 5 | 6 | 2 | 1 | 1 | 9 |

D. | | | | | | |

6. Facility or Business RCRA Contact Person: ☐ Same address as #__ above or:

First Name*:

ERIC

Last Name*:

MIRANDA

Title*:

PRESIDENT

Phone Number*:

954-327-0724

Extension*:

N/A

Fax*:

954-327-0755

E-Mail*:

EMIRANDA@WPCORP.NET

Street or P.O. Box (or same address box is checked)*: PO BOX 291197

City or Town*:

DAVIE

State*:

FL

Zip Code*:

33329

Country (if not USA):

USA

RCRA Hazardous Waste Status Notification or Out of Business Notification		EPA ID No.* FLD980709075	
7. Real Property (FL Land) Owner of the Facility's Physical Location (List additional owners in the comments section.)			
Name of Owner*: ERIC MIRANDA		Date became Owner*: 12 / 07 / 07 <input type="checkbox"/> New Owner mm dd yy	
Street or P.O. Box (or same address box is checked)*: 3650 SW 47 AVE		Phone Number*: 954-327-0724	
City or Town*: DAVIE	State*: FL	Zip Code*: 33314	Country (if not USA): USA
E-Mail*: EMIRANDA@WPCORP.NET			
Owner Type*: <input checked="" type="checkbox"/> Private <input type="checkbox"/> Federal <input type="checkbox"/> Municipal <input type="checkbox"/> State <input type="checkbox"/> County <input type="checkbox"/> Other _____			
Comments:			
8. Facility Operator (List additional Operators in the comments section). Same address as # ____ above or:			
Name of Operator*: ERIC MIRANDA		Date became Operator*: 12 / 07 / 07 <input type="checkbox"/> New Operator mm dd yy	
Street or P.O. Box (or same address box is checked)*: PO BOX 291197		Phone Number*: 954-327-0724	
City or Town*: DAVIE	State*: FL	Zip Code*: 33314	Country (if not USA): USA
E-Mail*: EMIRANDA@WPCORP.NET			
Operator Type*: <input checked="" type="checkbox"/> Private <input type="checkbox"/> Federal <input type="checkbox"/> Municipal <input type="checkbox"/> State <input type="checkbox"/> County <input type="checkbox"/> Other _____			
Comments:			
9. RCRA Hazardous Waste Activities at this Facility: (Mark 'X' in all that apply):			
(1) Generator of Hazardous Waste			
<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No (This does not include Universal Waste or Used Oil)			
If YES, Choose only one of the following three categories.			
<input type="checkbox"/> a. Large Quantity Generator (LQG):			
<ul style="list-style-type: none"> - Generates in any calendar month (includes quantities imported by importer site) 1,000 kilograms or greater per month (kg/mo) (2,200 lbs/mo.) of non-acute hazardous waste; or - Generates in any calendar month, or accumulates at any time, more than 1 kg/mo (2.2 lbs/mo) of acute hazardous waste; or - Generates in any calendar month, or accumulates at any time, more than 100 kg/mo (220 lb/mo) of acute hazardous spill cleanup material. 			
<input type="checkbox"/> b. Small Quantity Generator (SQG):			
<ul style="list-style-type: none"> - Generates in any calendar month greater than 100kg/mo but less than 1,000 kg/mo (>220 to <2,200 lbs.) of non-acute hazardous waste and/or 1 kg (2.2 lbs) or less of acute hazardous waste and/or no more than 100 kg (220 lbs) of any acute hazardous spill cleanup material. 			
<input type="checkbox"/> c. Very Small Quantity Generator (VSQG):			
<ul style="list-style-type: none"> - Generates in any calendar month 100 kg/mo or less (220 lbs.) of non-acute hazardous waste and/or 1 kg (2.2 lbs) or less of acute hazardous waste. 			
In addition, indicate other generator activities that apply.			
<input type="checkbox"/> d. Short-Term Generator (one-time, not on-going)			
<input type="checkbox"/> e. Mixed Waste (hazardous and radioactive) Generator			
<input type="checkbox"/> f. United States Importer of hazardous waste			
<input type="checkbox"/> g. LQG notifying of VSQG Hazardous Waste Under Control of the Same Person pursuant to 40 CFR 262.17(f). (Addendum A Required)			
<input type="checkbox"/> h. Episodic: Not lasting more than 60 days: __SQG__LQG (Addendum B Required)			
<input type="checkbox"/> i. Electronic Manifest Broker, as defined in 40 CFR 260.10, electing to use EPA electronic manifest system to obtain, complete, and transmit an electronic manifest under a contractual relationship with a hazardous waste generator.			

9. RCRA Hazardous Waste Activities at this Facility continued: (Mark 'X' in all that apply):

For Items 3 through 9, mark 'X' in all that apply.

- (2)
- Treater, Storer, or Disposer of Hazardous Waste**
- (at your facility—Choose Only One) Note: A hazardous waste permit may be required for this activity.

- ☐ a. Operating Commercial TSD
- ☐ b. Operating Non-Commercial TSD
- ☐ c. Non-Operating: Postclosure or Corrective Action Permit or Order (HSWA, etc.)

- (3)
- ☐
- Recycler of Hazardous Waste**
- (at your facility)

Specify: ☐ Commercial ☐ Non-CommercialSpecify: ☐ Stores prior to recycling ☐ Does not store prior to recycling.

Note: A permit may be required for storage prior to recycling.

- (4)
- ☐
- Exempt Boiler and/or Industrial Furnace**

- ☐ a. Small Quantity On-site Burner Exemption
- ☐ b. Smelting, Melting, and Refining Furnace Exemption

- (5)
- ☐
- Person Authorized to Manage Very Small Quantity Waste Generated at Other Facilities**

Choose this management activity ONLY if you attach

EITHER a copy of your application for such authorization OR the authorization you received from FDEP.

- (6)
- ☐
- Receives Hazardous Waste from Off-Site**

- (7)
- ☐
- Underground Injection Control**

- (8)
- ☐
- Recognized Trader—**
- Mark all that apply

- ☐ a. Importer
- ☐ b. Exporter

- (9)
- ☐
- Importer/ Exporter of Spent Lead-Acid Batteries (SLABs) under 40 CFR subpart G—**
- Mark all that apply

- ☐ a. Importer
- ☐ b. Exporter

10. Waste Codes for Federally Regulated Hazardous Wastes*: List the waste codes of the Federal hazardous wastes handled at your facility. List them in the order they are presented in the regulations (e.g., D001, D003, F007, K019, P012, U112).

Hazardous waste transporters must list codes routinely or usually transported. Use comments or an additional page if more spaces are needed.

1 D001	2 D002	3 F001	4 F003	5 F005	6	7
8	9	10	11	12	13	14
15	16	17	18	19	20	21

11. Other Status Changes (If no longer handling waste or closed, items 9 and 10 should be left blank and items 12-16 skipped):**(A) Central Accumulation Area (CAA) or Facility Closed:**

- ☐ Central Accumulation Area (CAA)
- ☐ Facility Closed (Complete this section only if all business activities at this facility have ceased.)

(B) Closure Dates:

- ☐ (1) Expected closure date _____ (date in mm/dd/yyyy)
- ☐ (2) Requesting new closure date _____ (date in mm/dd/yyyy)
- ☐ (3) Date of closure: _____ (date in mm/dd/yyyy)
- ☐ a. In compliance with the closure performance standards in 40 CFR 262.17(a)(8)
- ☐ b. Not in compliance with the closure performance standards in 40 CFR 262.17(a)(8)

(C) Property Tax Default ☐**(D) Petition for Bankruptcy Protection** ☐

14. HW Transporter Activities: (Mark 'X' and complete all that apply if you need to register your HW Transporter activities)

Transporters of and Transfer Facilities for Hazardous Waste in the State of Florida are required to register and annually renew their registration. Evidence of casualty/liability insurance pursuant to 62-730.170(2)(a) is required as part of this registration. Transporters and transfer facilities may only begin operations after receiving approval from the Department.

Generators who transport waste only within the boundaries of their facility should NOT register in box 14.A below.

A. HW Transporter Registration Information (must be completed annually and when this information changes)

This form is: ☐ Initial Registration ☐ Renewal ☒ Notification of changes ☐ Cancel Registration

☐ 1. For own waste only

☒ 2. For commercial purposes

☐ 3. Both commercial and own waste

4. Transportation Mode ☐ Air ☐ Rail ☒ Highway ☐ Water ☐ Other - specify _____

B. HW Transfer Facility Registration Information (must be completed annually and when this information changes)

☒ This facility is a Hazardous Waste Transfer Facility: (as listed in Item 3) Storage Volume 80 Drums

This form is: ☒ Initial Registration ☐ Renewal ☐ Notification of changes ☐ Cancel Registration

Note: Hazardous Waste transfer facilities must comply with the requirements of Rule 62-730.171, F.A.C., and Rule 62-730.182, F.A.C.

The Transfer Facility records required under the provisions of Rule 62-730.171(6), F.A.C., are kept at (check one):

☒ Our mailing (business) address ☐ The site (facility) address

Please enter the EPA ID Number of the HW Transporter who carries the insurance for this Transfer Facility:

F	L	D	9	8	0	7	0	9	0	7	5
---	---	---	---	---	---	---	---	---	---	---	---

Please see 14.C for additional items to be submitted for registration of a Hazardous Waste Transfer Facility [Rule 62-730.171(3), Florida Administrative Code (F.A.C.)]:

C. The following items are required to be submitted with the initial notification for a transfer facility and any changed items must be submitted with any subsequent submission [Rule 62-730.171(3), Florida Administrative Code (F.A.C.)]:

___ Certification by a responsible corporate officer of the transporter facility that the proposed location satisfies the criteria of Section 403.7211(2), Florida Statutes (F.S.) [Rule 62-730.171(3)(a)1., F.A.C.]

___ Evidence of the transporter facility's financial responsibility [Rule 62-730.171(3)(a)3., F.A.C.]

___ A brief general description of the transfer facility operations [Rule 62-730.171(3)(a)4., F.A.C.]

___ A copy of the facility closure plan [Rule 62-730.171(3)(a)5., F.A.C.]

___ A copy of the contingency and emergency plan [Rule 62-730.171(3)(a)6., F.A.C.]

___ A map or maps of the transfer facility [Rule 62-730.171(3)(a)7., F.A.C.]

15. Eligible Academic Entities with Laboratories—Notification for opting into or withdrawing from managing laboratory hazardous wastes pursuant to 40 CFR Part 262 Subpart K

☐ 1. Opting into or currently operating under 40 CFR Part 262 Subpart K for the management of hazardous wastes in laboratories

See the item-by-item instructions for definitions of types of eligible academic entities. Mark all that apply:

☐ a. College or University

☐ b. Teaching Hospital that is owned by or has a formal written affiliation agreement with a college or university

☐ c. Non-profit Institute that is owned by or has a formal written affiliation agreement with a college or university

☐ 2. Withdrawing from 40 CFR Part 262 Subpart K for the management of hazardous wastes in laboratories

Used Oil and Hazardous Secondary Material

EPA ID No.* FLD980709075

16. Used Oil and Used Oil Filter Activities: (Mark 'X' and complete all that apply)

Transporters (exemptions in 40 CFR 279.40(a)(1-4)), transfer facilities, processors, off-specification burners, and/or marketers must annually register with the Department using this form. An annual \$100 registration fee is required for all, except used oil (UO) Processors and collection centers.

This form is: ☐ Initial Registration ☐ Renewal ☐ Notification of changes ☐ Cancel Registration

- ☐ If applicable, a check or money order, in the amount of \$100, payable to Florida Department of Environmental Protection is enclosed. UO Collection Centers must check 16.(2) of this form (not as a registration).

(1) Used Oil Transporter - mark 'X' in all that apply: (occurring in Florida)

- ☐ a. Transporter (off-site) and noncontiguous locations
☐ b. Transfer Facility

(2) ☐ Collection Center (From businesses, no more than 55 gal per shipment)

(3) ☐ Used Oil Processor (A permit is required.)

(4) ☐ Used Oil Re-refiner (A permit is required.)

(5) ☐ Off-Specification Used Oil Burner
☐ Utility Boiler ☐ Industrial Boiler ☐ Industrial Furnace

(6) Used Oil Fuel Marketer ☐ On-Spec ☐ Off-Spec

(7) Used Oil Filter Management (must annually register)

- ☐ a. Transporter
☐ b. Transfer Facility
☐ c. Processor (Annual Report Required)
☐ d. End User (see instructions for definition)

(8) The records required under the provisions of Rule 62-710.510, FAC, are kept at (check one):

- ☐ Our mailing (business) address (as listed in Item 4)
☐ The site (facility) address (as listed in Item 3)

(9) Used Oil Transporters: (Exemptions in 40 CFR 279.40(a)(1-4))

- ALL registered UO transporters must submit an annual report except generators transporting UO from noncontiguous operations within their own company.
- UO transporters transporting off-site over public highways only within their own company must submit proof of insurance.
- UO transporters transporting more than 500 gallons/year must submit proof of insurance annually, and must sign and certify this submission as a certified used oil transporter in section 19 (except those exempted by Rule 62-710.600(1), F.A.C.).

___ The used oil annual report is attached ___ Evidence of Liability Insurance pursuant to 62-710.600(2)(e), F.A.C. is attached.

17. Notification of Hazardous Secondary Material (HSM) Activity

- (1) ☐ Notifying under 40 CFR 260.42 that you will begin managing, are managing, or will stop managing hazardous secondary material under 40 CFR 260.30, 40 CFR 261.4(a)(23), (24), or (27). (Addendum C Required)
- (2) ☐ Notifying under 40 CFR 260.43(a)(4)(iii) that the product of your recycling process has levels of hazardous constituents that are not comparable to or unable to be compared to a legitimate product or intermediate but that the recycling is still legitimate. (Addendum C Required)

Required signature page

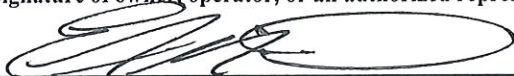
EPA ID No.* FLD980709075

18. Comments (attach a page if more space is needed):

19. Certification: I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. The information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for known violations.

☐ I certify as a Used Oil Transporter that I am familiar with the applicable Florida and Federal laws and rules governing used oil transportation and have an annual and new employee training program in place covering the applicable used oil rules. Evidence of financial responsibility is demonstrated by the Used Oil Transporter Certificate of Liability Insurance, DEP form 62-730.900(5)(a), F.A.C..

Signature of owner, operator, or an authorized representative:



Date Signed (mm-dd-yyyy):

04-15-2020

Print Name (First, Middle Initial, Last):

ERIC, I, MIRANDA

Title:

PRESIDENT

Organization:

WORLD PETROLEUM CORP

Used Oil ☐

Email:

Signature of owner, operator, or an authorized representative:

Date Signed (mm-dd-yyyy):

Print Name (First, Middle Initial, Last):

Title:

Organization:

Used Oil ☐

Email:

If the person that filled in this form is not the Facility Contact or Operator, please complete the information below:

ANDREA MIRANDA

954-327-0724

AVMIRANDA@WPCORP.NET

(Name of person completing this form)

(Phone Number)

(E-mail Address)

Addendum A: LQG Consolidation of VSQG Hazardous Waste		EPA ID No.*
<p><u>Only fill out this form if:</u></p> <ul style="list-style-type: none"> You are the LQG receiving hazardous waste from VSQGs under the control of the same person. Use additional pages if more space is needed. 		
<div style="display: flex; justify-content: space-between; align-items: center;"> VSQG 1 <div> <input type="checkbox"/> New <input type="checkbox"/> Update <input type="checkbox"/> Delete </div> </div>		
A. EPA ID Number (if assigned)		B. Facility Name
C. Facility Street Address		
D. City	E. State	F. Zip Code
G. Contact Phone Number	H. Contact Name	
I. Contact Email		
<div style="display: flex; justify-content: space-between; align-items: center;"> VSQG 2 <div> <input type="checkbox"/> New <input type="checkbox"/> Update <input type="checkbox"/> Delete </div> </div>		
A. EPA ID Number (if assigned)		B. Facility Name
C. Facility Street Address		
D. City	E. State	F. Zip Code
G. Contact Phone Number	H. Contact Name	
I. Contact Email		
<div style="display: flex; justify-content: space-between; align-items: center;"> VSQG 3 <div> <input type="checkbox"/> New <input type="checkbox"/> Update <input type="checkbox"/> Delete </div> </div>		
A. EPA ID Number (if assigned)		B. Facility Name
C. Facility Street Address		
D. City	E. State	F. Zip Code
G. Contact Phone Number	H. Contact Name	
I. Contact Email		

Addendum B: Episodic Generator				EPA ID No.*	
<p><u>Only fill out this form if:</u></p> <ul style="list-style-type: none"> You are an SQG or VSQG generating hazardous waste from a planned or unplanned episodic event, lasting no more than 60 days, that moves the generator to a higher generator category. Note: Only one planned and one unplanned episodic event are allowed within one year; otherwise, you must follow the requirements of the higher generator category. Use additional pages if needed. 					
Episodic Event					
A. Planned			B. Unplanned		
<input type="checkbox"/> Excess chemical inventory removal <input type="checkbox"/> Tank Cleanouts <input type="checkbox"/> Short-term construction or demolition <input type="checkbox"/> Equipment maintenance during plant shutdowns <input type="checkbox"/> Other _____			<input type="checkbox"/> Accidental spills <input type="checkbox"/> Production process upsets <input type="checkbox"/> Product recalls <input type="checkbox"/> "Acts of nature" (Tornado, Hurricane, Flood, etc.) <input type="checkbox"/> Other _____		
C. Emergency Contact Phone			D. Emergency Contact Name		
E. Beginning Date _____ (mm/dd/yyyy)			F. End Date _____ (mm/dd/yyyy)		
Waste 1					
G. Waste Description				H. Estimated Quantity (in pounds)	
I. Federal Hazardous Waste Codes					
Waste 2					
G. Waste Description				H. Estimated Quantity (in pounds)	
I. Federal Hazardous Waste Codes					
Waste 3					
G. Waste Description				H. Estimated Quantity (in pounds)	
I. Federal Hazardous Waste Codes					



Contingency Plan and Emergency Procedures for Spill Prevention Controls and Countermeasures

Prepared For:

**WORLD PETROLEUM CORP
3650 SW 47th Ave
Davie FL 33314**

CURRENT AS OF APRIL 15, 2020

The purpose of the contingency plan is to minimize hazards to human health or the environment from any unplanned sudden or non-sudden releases of hazardous wastes or hazardous material and constituents to the air, soil, or surface waters.

The Plan must be implemented immediately whenever there is a release of hazardous material that could threaten human health or the environment. The original document is located in the main office.

During an emergency situation, the emergency coordinator must be notified immediately. The designated Emergency Coordinators and his contact information is listed in the SPCC Plan. He is authorized to commit the resources needed to carry out the Contingency Plan. If the Emergency Coordinator cannot be contacted, secondary contact is provided in the SPCC Plan. Detailed descriptions of emergency procedures are outlined in the above SPCC Plan.

Plan copies are distributed to the local sheriff's office, fire department, and hospitals. MSDS information for materials that are handled at the WPC facility is located inside the Plant office (Entrance door). The contingency plan will be maintained at the facility and submitted to local emergency response authorities, which are identified in this plan. Copies of return receipts will serve to verify receipt of the plan by the local response authorities. The plan will be amended when necessary (i.e., regulations change; plan fails upon use; the facility owner, process, or contingency plan is modified; etc.).

Specific procedures required during a possible release of material are outlined in the SPCC Plan. Equipment that can be used during an emergency is listed at the end of this attachment, and detailed instructions are included in both plans. During a power outage, communications can be maintained by direct connect cellular phones. All emergency equipment in all plants, such as fire monitors, emergency eyewash/showers, is inspected and flushed monthly. Fire extinguishers, eyewash stations, showers, and spill kits are strategically located throughout the facility. Locations have been determined by area usage and the potential for harm. Fire extinguishers are checked and tagged in accordance with fire safety practices. Annual inspections of the fire extinguishers are performed by an outside contractor.

Fire Response

Should personnel discover a fire or smell smoke, they would contact 911 immediately and follow the procedures outlined in the Contingency Plan. The responding fire station has been provided with the WPC facility Plans and is acquainted with the facility operations and layout. The fire station has permission to cut the lock on the gate for access to the facility in the event of an emergency after hours. An emergency contact number is posted for responders to contact regarding inventory records.

Evacuation

All plant personnel, including visitors and contractors, must leave the facility through the proper exit. All personnel will assemble across the street in the parking area located on 47th Ave.

EMERGENCY TELEPHONE NUMBERS

TYPE OF FACILITY: Waste Oil Bulk Storage

NAME OF FACILITY: World Petroleum Corp

LOCATION OF FACILITY: 3650 SW 47th Ave
Davie, Florida 33314

NAME AND ADDRESS OF PARENT CORPORATION: Post Office Box 291197
Davie, Florida 33329

COMPANY EMERGENCY PHONE NUMBERS:

Plant Manager:	Eric Miranda
Cell Phone:	754-581-2233
Home Address:	5081 Hancock Rd SW Ranches FL 33330
Operations Manager:	Eric Miranda
Home Address:	5081 Hancock Rd SW Ranches FL 33330
Corporate Office:	Eric Miranda
Office:	954-327-0724
Cell Phone:	754-581-2233

CONSULTANT: Jones Ecosystem Management
John Jones: 479-353-1368

(EMERGENCY PHONE#’S)
PRIMARY PHONE #: Eric Miranda: 954-327-0724
Cell Phone: 754-581-2233

SECONDARY PHONE#: Chad Gregory: 954-445-6242

EMERGENCY RESPONSE AGENCIES:

<u>DEPARTMENT</u>	<u>COUNTY</u>
Sheriff	911
Police	911
Address:	1230 S. Nob Hill Rd Davie, FL 33324 (954) 693-8200
Fire	911
Address:	6901 Orange Drive Davie, FL 33314 (954) 797-1213
Ambulance	911
Hospital	911
Address:	Plantation General Hospital 401 NW 42 nd Ave Plantation, FL 33317 (954) 587-5010

EMERGENCY TELEPHONE NUMBERS

National Response Center: (800) 424-8802

Environmental Protection Agency: (404) 562-8700

**Florida Department of
Environmental Regulation
State Warning Point: (800) 320-0519**

**Department of Planning and
Environmental Protection: (954) 519-1400**

EMERGENCY COORDINATORS ON-SITE

Chief: Eric Miranda
Deputy: Chad Gregory
Home: 11831 NW 26 St
Plantation FL 33323

PHONE NUMBERS

Cell Phone: 754-581-2233
Office: 954 327-0724
Phone: 954-445-6242

EMERGENCY COORDINATOR OFF-SITE

Eric Miranda, President 954-327-0724
Consultant: Jones Ecosystem Management
John Jones: 479-353-1368

EMERGENCY RESPONSE TEAM:

All operations personnel will comprise the Emergency Response Team and will be under the authority of the Emergency Coordinator.

The Chief Emergency Coordinator will determine whether additional assistance is needed from local fire or police units or other emergency response agencies as needed.

WORLD PETROLEUM CORP

AVAILABLE EQUIPMENT FOR OPERATIONS

VEHICLES:	1 – 3208-GALLON CAPACITY PUMP TRUCK 1 – 3169-GALLON CAPACITY PUMP TRUCK 2 – 8500-GALLON TANK TRAILERS 1 – STIRLING TRACTOR 5 – CELLULAR PHONES 2 – JOBSITE PICKUP TRUCKS
SUPPLIES:	20 ROLLS OF VISQUEEN 10 BAGS (APPROXIMATELY) OIL DRY 6 BALES (APPROXIMATELY – 200 EACH) ABSORBENT PADS 4 BALES (APPROXIMATELY) OF 4' X 10' BOOM – 160' 100 POUNDS (APPROXIMATELY) OF FLANNEL RAGS 5 BAGS (APPROXIMATELY) OF VERMICULITE
PROTECTIVE CLOTHING/ EQUIPMENT:	1 SUPPLIED AIR RESPIRATOR CAPABLE OF SUPPLYING TWO MEN 4 SUPPLIED AIR FULL-FACE RESPIRATORS 4 FULL-FACE FILTER RESPIRATORS 2 CASES TYVEK SUITS 2 CASES SARANEX FULL SUITS PVC BOOTS HARD HATS CHEMICAL GOGGLES
EQUIPMENT:	2" DIAPHRAGM PUMP WITH HOSE AND FITTINGS 1 STEAM CLEANER 2 PRESSURE WASHERS 2 BLOWERS 2 POWER CUT-OFF SAWS SHOVELS, NON-SPARKING AND METAL, BROOMS 3 – 6-LB. ABC FIRE EXTINGUISHERS 16 – 10-LB. ABC FIRE EXTINGUISHERS 1 – 8-LB. ABC FIRE EXTINGUISHERS 6 – 2.5-LB. ABC FIRE EXTINGUISHERS GASTECH VAPOR AND O ₂ METER TRAFFIC CONES POLYPROPYLENE SCOOP 3 EMERGENCY YELLOW FLASHING LIGHTS 6 BARRICADES

WORLD PETROLEUM CORP

AVAILABLE EQUIPMENT FOR OPERATIONS

EQUIPMENT: **MANHOLE COVER HOOKS**
 2 – 14' MANHOLE LADDERS
 100 (APPROXIMATELY) 55-GALLON D.O.T. 17-H DRUMS
 10 (APPROXIMATELY) D.O.T. OVERPACKS
 DRUM SLINGS
 DRUM LINERS (FOR ACID SPILLS)

HEAVY
EQUIPMENT: **ALSO AVAILABLE ON A 24-HOUR/DAY BASIS:**

 1 BACKHOE
 1 FORKLIFT

STORAGE TANK SPILL

1. Call Davie Fire Department **911**. Inform them there has been a tank failure at World Petroleum Corp at 3650 S.W. 47th Avenue, Davie, FL and used oil is being contained. The Fire Department should be present with foam extinguishers to protect against fire.
2. Notify the Davie Police Department at 911.
3. Secure the portable pump from the maintenance building.
4. Set the equipment at least 25 feet away from the spill area to avoid any possible electrical ignition of the spilled fuel.
5. Position as many empty tankers as necessary to pump the fuel out of the dike and into the tanker. The tankers should be parked by the loading rack if possible to handle any tanker overflow. (Could require 3 to 5 tankers depending on the size of the tanker and the quantity of fuel in the storage tank).
6. As each tanker is filled, move it to a remote area of the property.
7. After pumping as much fuel as possible, spray the area with foam (if that has not already been done) and follow clean-up instructions from Emergency Coordinator.
8. Call the F.D.E.P. State Warning Point (800) 320-0519.
9. Call the Environmental Protection Agency in Atlanta, Georgia at (404) 562-8700.

TANK TRUCK SPILL

1. If unloading operation is in progress, cease operation.
2. Quickly check the tanker to see if the fuel discharge is due to an open valve or leak that can be quickly plugged. Stop the flow if possible.
3. Make sure that there is nothing in the vicinity that could ignite the fuel. Make especially sure there is no smoking.
4. Clear the areas of all personnel and equipment.
5. Notify Eric Miranda: 954-327-0724
Chad Gregory: 954-445-6242
6. Call the County Fire Department (Station I) at 911. Inform them that a tanker has ruptured at World Petroleum Corp facility located at 3650 S.W. 47th Avenue, Davie, Florida and used oil is being released. The Fire Department should be present with foam extinguishers to protect against fire.

Emergency Response Contingency Plan

Emergency Telephone Numbers

TYPE OF FACILITY:	Waste Oil Bulk Storage
NAME OF FACILITY:	World Petroleum Corp
LOCATION OF FACILITY:	3650 SW 47 th Ave Davie, Florida 33314
NAME AND ADDRESS OF PARENT CORPORATION:	Post Office Box 291197 Davie, Florida 33329
COMPANY EMERGENCY PHONE NUMBERS:	Plant Manager: Eric Miranda Cell Phone: 754-581-2233 Operations Manager: Eric Miranda Corporate Office: Eric Miranda Office: 954-327-0724 Cell Phone: 754-581-2233
CONSULTANT:	Jones Ecosystem Management John Jones: 479-353-1368
EMERGENCY PHONE NUMBERS (2 people in authority):	Eric Miranda: 954-327-0724 Cell Phone: 754-581-2233 Chad Gregory: 954-445-6242
EMERGENCY RESPONSE AGENCIES:	Town of Davie Police Department 954-693-8200 Town of Davie Fire Rescue 954-797-1213 Plantation General Hospital 954-587-5010
National Response Center:	(800) 424-8802
Environmental Protection Agency:	(707) 347-3016

Florida Department of
Environmental Regulation
State Warning Point: (850) 413-9911

Department of Planning and
Environmental Protection: (954) 519-1400

Emergency Coordinators On-Site

Chief:	Eric Miranda	Cell Phone: 754-581-2233
Deputy:	Mario Vergara	Office: 954-327-0724 Cell Phone: 305-986-9931
Deputy:	Chad Gregory	Cell Phone: 954 445-6242

Emergency Coordinators Off-Site

	Eric Miranda, President	954-327-0724
Consultant:	Jones Ecosystem Management John Jones:	479-353-1368

Emergency Response Team

All operations personnel will comprise the Emergency Response Team and will be under the authority of the Emergency Coordinator.

The Chief Emergency Coordinator will determine whether additional assistance is needed from local fire or police units or other emergency response agencies as needed.

On-Site Emergency Response Equipment

PROTECTIVE CLOTHING/ EQUIPMENT:

- 1 SUPPLIED AIR RESPIRATOR CAPABLE OF SUPPLYING TWO MEN
- 4 SUPPLIED AIR FULL-FACE RESPIRATORS
- 4 FULL-FACE FILTER RESPIRATORS
- 2 CASES TYVEK SUITS
- 2 CASES SARANEX FULL SUITS
- PVC BOOTS
- HARD HATS
- CHEMICAL GOGGLES

EQUIPMENT:

- 2" DIAPHRAGM PUMP WITH HOSE AND FITTINGS
- 1 STEAM CLEANER
- 2 PRESSURE WASHERS
- 2 BLOWERS
- 2 POWER CUT-OFF SAWS
- SHOVELS, NON-SPARKING AND METAL, BROOMS
- 3 – 6-LB. ABC FIRE EXTINGUISHERS
- 16 – 10-LB. ABC FIRE EXTINGUISHERS
- 1 – 8-LB. ABC FIRE EXTINGUISHERS
- 6 – 2.5-LB. ABC FIRE EXTINGUISHERS
- GASTECH VAPOR AND O₂ METER
- TRAFFIC CONES
- POLYPROPYLENE SCOOP
- 3 EMERGENCY YELLOW FLASHING LIGHTS
- 6 BARRICADES

ATTACHMENT H

Facility Closure Plan

Used Oil Processing Facility Permit Application

World Petroleum Corp.
3650 SW 47th Avenue
Davie, Florida 33314

INTRODUCTION

World Petroleum Corp. Inc. is a company engaged in the collection, transport, storage and processing of used oil and oily wastewater. The facility is located at 3605 SW 47th Avenue, Davie, Florida 33314. The following Closure Plan has been prepared for World Petroleum Corp., Inc. pursuant to the permitting requirements set forth in Rule 62-710.800(5), Florida Administrative Code (FAC). A copy of this Closure Plan will also be maintained on file at the World Petroleum Corp., Inc. facility, in accordance with the record keeping requirements set forth in Rule 62-710.510(4), FAC

PROCESS DESCRIPTION

World Petroleum Corp., Inc. operates a used oil collection; transportation, processing and recycling business with serves a variety of automotive commercial and industrial businesses throughout South Florida with operations and management as described in the following:

Types of Products Collected

Automotive, industrial used oils, as well as oily wastewaters, off-specification diesel fuel, oil filters, oily rags/absorbents, and used automotive coolants are collected. Hazardous waste products, as defined in 40 CFR 261 are not collected.

Product Collection

Each truck is equipped with a Tiff Instruments Inc. halogen detector and the vehicle operator is trained on the use of it. The product from each client is tested with this device, which will give off a beeping noise if the halogen content is >800 ppm. If the beeper goes off the vehicle operator will then use a "Dexsil" halogen solvent test kit. No product is collected that tests positive for halogen solvents. In such a case, the client is instructed to have their product profiled through analytical test methods by a certified laboratory. If the product is then shown to be non-hazardous pursuant to 40 CFR 261, it will be collected.

Product Storage and Disposal

Product collected by fleet vehicles is transferred into designated product-specific ASTs at WPC for storage. The product is treated to remove water and subsequently transported off-site using the large capacity trailer rigs. Depending upon the pre-determination arrangements, the product may be marketed as industrial fuel destined for recycling, reprocessing, used fuel in a licensed energy recovery industrial furnace or disposed of otherwise at an appropriate facility.

USED OIL MANAGEMENT

Process Description

World Petroleum Corp., Inc uses a combination of physical and chemical mechanisms to separate water from the oil. Phase separation is achieved by heating the oil. Heating is accomplished by circulating hot oil through coils in a treatment tank. As the water/oil mixture is heated, the oil layer rises and the aqueous layer sinks. The water is removed by draining the bottoms of the storage tanks. For more difficult mixtures, the phase separation is enhanced by adding proprietary chemicals. The demulsifying agents serve to accelerate the process by reducing surface tension of the small oil droplets and allowing coagulation. As in the basic process, the water is drained from the bottom of the storage/treatment tanks, allowing the purer oil to be transferred. Processed oil contains high thermal content and is sold as an energy source.

Liquid Waste Segregation

Each type of product is stored separately in a designated product-specific AST. Under no circumstance are incompatible liquids mixed. Each AST has a product designation.

Inventory of Stored Products

Weekly inventory reconciliation of the products currently stored on-site against the transportation and disposal manifest is performed. Any discrepancies are investigated to determine if product leakage for an AST occurred

Other Product Management

Used oil filters and absorbents/oily rags are collected in flat bed trucks. These products are then transferred into a designated "product-specific" sealed roll-off container at the facility. The used oil filters are transported off-site in the sealed roll-off container to a foundry where the filters are recycled.

FACILITY CLOSURE PROCEDURES

In accordance with Rule 62-710.800(9)(a) FAC, in the event that the World Petroleum Corp., Inc facility is closed, steps will be taken to ensure that: (1) there will be no need for further facility maintenance; (2) used oil will not contaminate surface or groundwater; (3) all tanks, piping, secondary containment and ancillary equipment including the storage pad for oily rags/absorbents and drums will be emptied, cleaned and decontaminated, and all materials removed and managed; and (4) aboveground storage and process tanks and all integral piping will be closed pursuant to Rule 62-761, FAC.

The above requirements will be met by closing the aboveground storage tank system and assessing the site in accordance with Rule 62-761.800(5) FAC. These activities will include:

- Notification of Broward County EPD and FDEP at least 30 days prior to closure of the storage tank system,
- Removal of all liquid and sludge from the tanks and integral piping and off-site disposal of the contents at properly licensed and permitted disposal/recycling facilities,
- Pressure wash rising of all containment areas and the storage pad, and
- Collection of representative soil samples from around and beneath the tank area, and visual inspection for evidence of contamination. Should evidence of contamination be present, then soil and groundwater contamination assessment and possibly remedial activities will be conducted in accordance with Rule 62-780, FAC.

A closure certification report will be submitted to certify closure was completed in accordance with the closure plan. Soil sample locations will identified and FDEP approval for the sampling locations prior to implementing the sampling plan. All liquid and solid samples will be analyzed for the same constituents as the sampling for used oil or sludges managed at the facility with the addition of TRPH for soil samples.

CLOSURE COST ESTIMATE

The FDEP approved the closure cost estimate prepared at the time of transfer of the facility. This closure estimate is considered valid and will be updated annually.



FLORIDA DEPARTMENT OF Environmental Protection

Bob Martinez Center
2600 Blair Stone Road MS 4548
Tallahassee, FL 32399-2400

Ron DeSantis
Governor

Jeanette Nuñez
Lt. Governor

Noah Valenstein
Secretary

March 12, 2020

Via e-mail: emiranda@wpcorp.net

Mr. Eric Miranda
World Petroleum Corp
Post Office Box 291197
Davie, Florida 33329

Re: FLD980709075 – World Petroleum Corp

Dear Mr. Miranda:

I reviewed the documentation submitted to demonstrate financial assurance for the above referenced facility and find it is in order. The trust fund valuation dated March 12, 2020 from U.S. Bank National Association indicating an account balance of \$89,119.84 demonstrates adequate financial assurance covering the Department approved closing cost estimate dated February 26, 2020. Therefore, the World Petroleum Corp used oil facility is in compliance at this time with the financial assurance requirements of Rule 62-701.630, Florida Administrative Code, which adopts 40 CFR Part 264, Subpart H, by reference.

Please contact me at (850) 245-8740 if you have any questions.

Sincerely,

A handwritten signature in blue ink that reads "Susan Eldredge".

Susan Eldredge
Government Operations Consultant II
Solid Waste Financial Assurance

cc: Bheem Kothur, DEP/Used Oil Program

Mail original completed form to: Department of Environmental Protection For assistance call: 850-245-8707
2600 Blair Stone Road, Mail Station 4560
Tallahassee, Florida 32399-2400

STATE OF FLORIDA
CERTIFICATE OF LIABILITY INSURANCE
HAZARDOUS WASTE TRANSPORTER AND USED OIL HANDLER

1. Nautilus Insurance Company
(Name of Insurer)
(the "Insurer"), of 101 Hudson Street, Suite 2550, Jersey City, NJ 07302
(Address of Insurer)

hereby certifies that it has issued liability insurance covering bodily injury and property damage including environmental restoration for sudden accidental occurrences to

World Petroleum Corp
(Name of Insured)
(the "Insured"), of 4100 SW 47 Avenue, Davie, FL 33314
(Physical Address of Insured)

in connection with the insured's obligation to demonstrate financial responsibility under Florida Administrative Code Rule 62-710.600(2) and 62-730.170. The coverage applies at:

<u>EPA/DEP I.D. No.</u>	<u>Name</u>	<u>Physical Address</u>
FLD980709075	World Petroleum Corp	3650 SW 47th Ave, Davie, FL 33314

FLR000167023 World Petroleum Corp 10407 US Hwy 41 N, Palmetto, FL 34221

(If coverage is for multiple facilities, identify each facility insured.)

This insurance is primary and the company shall not be liable for amounts in excess of \$ 3,000,000 for each accident, exclusive of legal defense costs. The coverage is provided under policy number SSP202312712, issued on 07/07/2019.
(date)

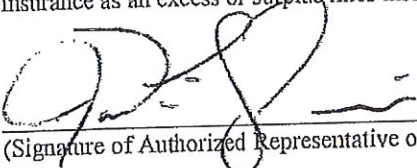
The effective date of said policy is 07/07/2019 and the expiration date of said policy is 07/07/2020.
(date)

This insurance is excess and the company shall not be liable for amounts in excess of \$ 10,000,000 for each accident in excess of the underlying limit of \$ 10,000,000 for each accident, exclusive of legal defense costs. The coverage is provided under policy number FX202312812, issued on 07/07/2019. The effective date of said policy is 07/07/2019 and the expiration date of said policy is 07/07/2020.
(date)

Mail original completed form to: Department of Environmental Protection For assistance call: 850-245-8707
2600 Blair Stone Road, Mail Station 4560
Tallahassee, Florida 32399-2400

2. The Insurer further certifies the following with respect to the insurance described in Paragraph 1:
- (a) Bankruptcy or insolvency of the insured shall not relieve the Insurer of its obligations under the policy.
 - (b) The Insurer is liable for the payment of amounts within any deductible applicable to the policy, with a right of reimbursement by the insured for any such payment made by the Insurer.
 - (c) Whenever requested by the Secretary (or designee) of the Florida Department of Environmental Protection (FDEP), the Insurer agrees to furnish to the Department a signed duplicate original of the policy and all endorsements.
 - (d) Cancellation of the insurance, whether by the Insurer or the Insured and any other termination of the insurance (e.g., expiration, non-renewal), will be effective only upon written notice and only after the expiration of thirty (30) days after a copy of such written notice is received by the Secretary of the FDEP as evidenced by certified mail return receipt.
 - (e) The Insurer shall not be liable for the payment of any judgment or judgments against the Insured for claims resulting from accidents which occur after the termination of the insurance described herein, but such termination shall not affect the liability of the Insurer for the payment of any such judgment or judgments resulting from accidents which occur during the time the policy is in effect.

I hereby certify that the Insurer is licensed to transact the business of insurance, or eligible to provide insurance as an excess or surplus lines insurer, in one of more States including Florida.



(Signature of Authorized Representative of Insurer)

Justin Failoni

(Typed name)

Producer

(Title)

Authorized Representative of

Nautilus Insurance Company

(Name of Insurer)

8000 Governors Square Blvd, Ste 301, Miami Lakes, FL 33016

(Address of Representative)

Mail original completed form to: Department of Environmental Protection For assistance call: 850-245-8707
2600 Blair Stone Road, Mail Station 4560
Tallahassee, Florida 32399-2400

STATE OF FLORIDA
CERTIFICATE OF LIABILITY INSURANCE
HAZARDOUS WASTE TRANSPORTER AND USED OIL HANDLER

1. Great Divide Insurance Company
(Name of Insurer)
(the "Insurer"), of 101 Hudson Street Ste 2550 Jersey City, NJ 07302
(Address of Insurer)

hereby certifies that it has issued liability insurance covering bodily injury and property damage including environmental restoration for sudden accidental occurrences to

World Petroleum Corp
(Name of Insured)
(the "Insured"), of 4100 SW 47th Ave Davie, Florida 33314
(Physical Address of Insured)

in connection with the insured's obligation to demonstrate financial responsibility under Florida Administrative Code Rule 62-710.600(2) and 62-730.170. The coverage applies at:

<u>EPA/DEP I.D. No.</u>	<u>Name</u>	<u>Physical Address</u>
<u>FLD980709075</u>	<u>World Petroleum Corp</u>	<u>3650 SW 47 Ave Davie Fl 33314</u>
<u>FLR000167023</u>	<u>World Petroleum Corp</u>	<u>10407 Hwy 41 N Palmetto, Fl 334221</u>

(If coverage is for multiple facilities, identify each facility insured.)

This insurance is primary and the company shall not be liable for amounts in excess of \$ 1,000,000 for each accident, exclusive of legal defense costs. The coverage is provided under policy number BAP202312612, issued on 07/07/2019.
(date)

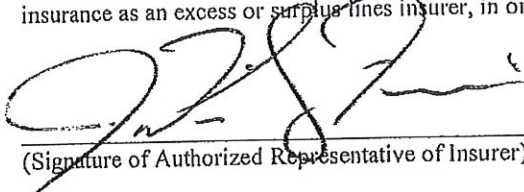
The effective date of said policy is 07/07/2019 and the expiration date of said policy is 07/07/2020.
(date)

This insurance is excess and the company shall not be liable for amounts in excess of \$ 10,000,000 for each accident in excess of the underlying limit of \$ 10,000,000 for each accident, exclusive of legal defense costs. The coverage is provided under policy number FFX202312812, issued on 07/07/2019. The effective date of said policy is 07/07/2019 and the expiration date of said policy is 07/07/2020.
(date) (date)

Mail original completed form to: Department of Environmental Protection For assistance call: 850-245-8707
2600 Blair Stone Road, Mail Station 4560
Tallahassee, Florida 32399-2400

2. The Insurer further certifies the following with respect to the insurance described in Paragraph 1:
- (a) Bankruptcy or insolvency of the insured shall not relieve the Insurer of its obligations under the policy.
 - (b) The Insurer is liable for the payment of amounts within any deductible applicable to the policy, with a right of reimbursement by the insured for any such payment made by the Insurer.
 - (c) Whenever requested by the Secretary (or designee) of the Florida Department of Environmental Protection (FDEP), the Insurer agrees to furnish to the Department a signed duplicate original of the policy and all endorsements.
 - (d) Cancellation of the insurance, whether by the Insurer or the Insured and any other termination of the insurance (e.g., expiration, non-renewal), will be effective only upon written notice and only after the expiration of thirty (30) days after a copy of such written notice is received by the Secretary of the FDEP as evidenced by certified mail return receipt.
 - (e) The Insurer shall not be liable for the payment of any judgment or judgments against the Insured for claims resulting from accidents which occur after the termination of the insurance described herein, but such termination shall not affect the liability of the Insurer for the payment of any such judgment or judgments resulting from accidents which occur during the time the policy is in effect.

I hereby certify that the Insurer is licensed to transact the business of insurance, or eligible to provide insurance as an excess or surplus lines insurer, in one of more States including Florida.


(Signature of Authorized Representative of Insurer)

Justin Failoni

(Typed name)

Producer

(Title)

Authorized Representative of

Great Divide Insurance Company

(Name of Insurer)

8000 Governors Square Blvd. ste 301 Miami Lakes, Florida 33016

(Address of Representative)



WORLPET-01

SNIEDERMEYER

DATE (MM/DD/YYYY)

07/02/2019

CERTIFICATE OF LIABILITY INSURANCE

THIS CERTIFICATE IS ISSUED AS A MATTER OF INFORMATION ONLY AND CONFERS NO RIGHTS UPON THE CERTIFICATE HOLDER. THIS CERTIFICATE DOES NOT AFFIRMATIVELY OR NEGATIVELY AMEND, EXTEND OR ALTER THE COVERAGE AFFORDED BY THE POLICIES BELOW. THIS CERTIFICATE OF INSURANCE DOES NOT CONSTITUTE A CONTRACT BETWEEN THE ISSUING INSURER(S), AUTHORIZED REPRESENTATIVE OR PRODUCER, AND THE CERTIFICATE HOLDER.

IMPORTANT: If the certificate holder is an ADDITIONAL INSURED, the policy(ies) must have ADDITIONAL INSURED provisions or be endorsed. If SUBROGATION IS WAIVED, subject to the terms and conditions of the policy, certain policies may require an endorsement. A statement on this certificate does not confer rights to the certificate holder in lieu of such endorsement(s).

PRODUCER
Collinsworth, Alter, Fowler & French, LLC
8000 Governors Square Blvd
Suite 301
Miami Lakes, FL 33016

CONTACT NAME: Susan Niedermeyer

PHONE

(A/C, No, Ext):

FAX

(A/C, No):

E-MAIL

ADDRESS:

Sniedermeyer@caffllc.com

INSURER(S) AFFORDING COVERAGE

NAIC #

INSURER A: Nautilus Ins Company

17370

INSURER B: Great Divide Insurance Co

25224

INSURER C: Markel American Ins Co

28932

INSURER D:

INSURER E:

INSURER F:

INSURED

World Petroleum Corp
PO Box 291197
Davie, FL 33329

COVERAGES

CERTIFICATE NUMBER:

REVISION NUMBER:

THIS IS TO CERTIFY THAT THE POLICIES OF INSURANCE LISTED BELOW HAVE BEEN ISSUED TO THE INSURED NAMED ABOVE FOR THE POLICY PERIOD INDICATED. NOTWITHSTANDING ANY REQUIREMENT, TERM OR CONDITION OF ANY CONTRACT OR OTHER DOCUMENT WITH RESPECT TO WHICH THIS CERTIFICATE MAY BE ISSUED OR MAY PERTAIN, THE INSURANCE AFFORDED BY THE POLICIES DESCRIBED HEREIN IS SUBJECT TO ALL THE TERMS, EXCLUSIONS AND CONDITIONS OF SUCH POLICIES. LIMITS SHOWN MAY HAVE BEEN REDUCED BY PAID CLAIMS.

INSR LTR	TYPE OF INSURANCE	ADDL INSD	SUBR WVD	POLICY NUMBER	POLICY EFF (MM/DD/YYYY)	POLICY EXP (MM/DD/YYYY)	LIMITS
A	<input checked="" type="checkbox"/> COMMERCIAL GENERAL LIABILITY <input type="checkbox"/> CLAIMS-MADE <input checked="" type="checkbox"/> OCCUR GEN'L AGGREGATE LIMIT APPLIES PER: <input type="checkbox"/> POLICY <input type="checkbox"/> PRO-JECT <input checked="" type="checkbox"/> LOC OTHER:	X	X	GLP202312512	07/07/2019	07/07/2020	EACH OCCURRENCE \$ 1,000,000 DAMAGE TO RENTED PREMISES (Ea occurrence) \$ 300,000 MED EXP (Any one person) \$ 10,000 PERSONAL & ADV INJURY \$ 1,000,000 GENERAL AGGREGATE \$ 3,000,000 PRODUCTS - COM/OP AGG \$ 3,000,000
B	AUTOMOBILE LIABILITY <input type="checkbox"/> ANY AUTO OWNED AUTOS ONLY <input checked="" type="checkbox"/> HIRED AUTOS ONLY MCS90 <input checked="" type="checkbox"/> SCHEDULED AUTOS <input checked="" type="checkbox"/> NON-OWNED AUTOS ONLY CA9948	X	X	BAP202312612	07/07/2019	07/07/2020	COMBINED SINGLE LIMIT (Ea accident) \$ 1,000,000 BODILY INJURY (Per person) \$ BODILY INJURY (Per accident) \$ PROPERTY DAMAGE (Per accident) \$
A	UMBRELLA LIAB <input checked="" type="checkbox"/> OCCUR EXCESS LIAB <input type="checkbox"/> CLAIMS-MADE DED <input checked="" type="checkbox"/> RETENTION \$ 0			FFX202312812	07/07/2019	07/07/2020	EACH OCCURRENCE \$ 10,000,000 AGGREGATE \$ 10,000,000
B	WORKERS COMPENSATION AND EMPLOYERS' LIABILITY ANY PROPRIETOR/PARTNER/EXECUTIVE OFFICER/MEMBER EXCLUDED? (Mandatory in NH) If yes, describe under DESCRIPTION OF OPERATIONS below	Y/N	X	WCA202937110	07/07/2019	07/07/2020	<input checked="" type="checkbox"/> PER STATUTE <input type="checkbox"/> OTH-ER E.L. EACH ACCIDENT \$ 1,000,000 E.L. DISEASE - EA EMPLOYEE \$ 1,000,000 E.L. DISEASE - POLICY LIMIT \$ 1,000,000
A	Pollution Liability			SSP202312712	07/07/2019	07/07/2020	Aggregate 2,000,000
C	Motor Truck Cargo			MKLM3IM0051392	07/07/2019	07/07/2020	Any One Veh/Loss 100,000

DESCRIPTION OF OPERATIONS / LOCATIONS / VEHICLES (ACORD 104, Additional Remarks Schedule, may be attached if more space is required)
State of Florida is named as additional insured with respect to general liability as required by written contract.

CERTIFICATE HOLDER

The Department of Environmental Protection
PO Box 3070
Tallahassee, FL 32315-3070

CANCELLATION

SHOULD ANY OF THE ABOVE DESCRIBED POLICIES BE CANCELLED BEFORE THE EXPIRATION DATE THEREOF, NOTICE WILL BE DELIVERED IN ACCORDANCE WITH THE POLICY PROVISIONS.

AUTHORIZED REPRESENTATIVE



April 15, 2020

DEP Waste Management Division-HWRS MS4560
2600 Blair Stone Rd
Tallahassee, FL 32399-2400
(850) 245-8707

RE: World Petroleum Corp Hazardous Waste Transfer Facility Application

I hereby certify that to the best of my knowledge the proposed transfer facility complies with the criteria set forth in F.S. 403.7211 as there will not be life threatening concentrations of hazardous substances which in the event of a catastrophic event would prevent egress from any residential subdivision within 1,000 yards of the proposed transfer facility. Further, there currently exists a hazardous waste transfer facility adjacent to the proposed transfer facility.

Regards,

A handwritten signature in black ink, appearing to read "Eric Miranda", is written over a horizontal line.

Eric Miranda
World Petroleum Corp



Proposed Facility Operations

Hazardous Waste Transfer Facility Notification

World Petroleum Corp
3650 SW 47th Ave
Davie FL 33314

INTRODUCTION

World Petroleum Corporation is a company engaged in the collection, transport, storage and processing of used oil and oily wastewater and other products. At the Davie, Florida facility, containers of hazardous waste are accumulated for shipment in accordance with the standards specified in 62-730.171, F.A.C. The facility is located at 3650 SW 47th Avenue, Ft. Lauderdale, Florida 33314.

PROCESS DESCRIPTION

World Petroleum Corporation operates a waste oil collection; transportation, processing and recycling business which serves a variety of automotive commercial and industrial businesses throughout Florida with operations and management as described in the following:

Types of Products Collected

Automotive, industrial waste oils, as well as oily wastewaters, off-specification diesel fuel, oil filters, oily rags/absorbents, and used automotive coolants are collected. Hazardous wastes, as defined in 40 CFR 261 will be collected and transported to the Davie facility for accumulation only in accordance with the rules applicable to a 10-day hazardous waste transfer facility.

HAZARDOUS WASTE TRANSFER

Process Description

World Petroleum Corporation collects containers of hazardous waste, most commonly in 55-gallon drums. While the facility wishes to accept all EPA hazardous waste codes (except those specifically associated with dioxins), the most common waste codes anticipated are Characteristic wastes with codes: D001 (Ignitable), D002 (Corrosive), D007 (Chromium), and D008 (Lead).

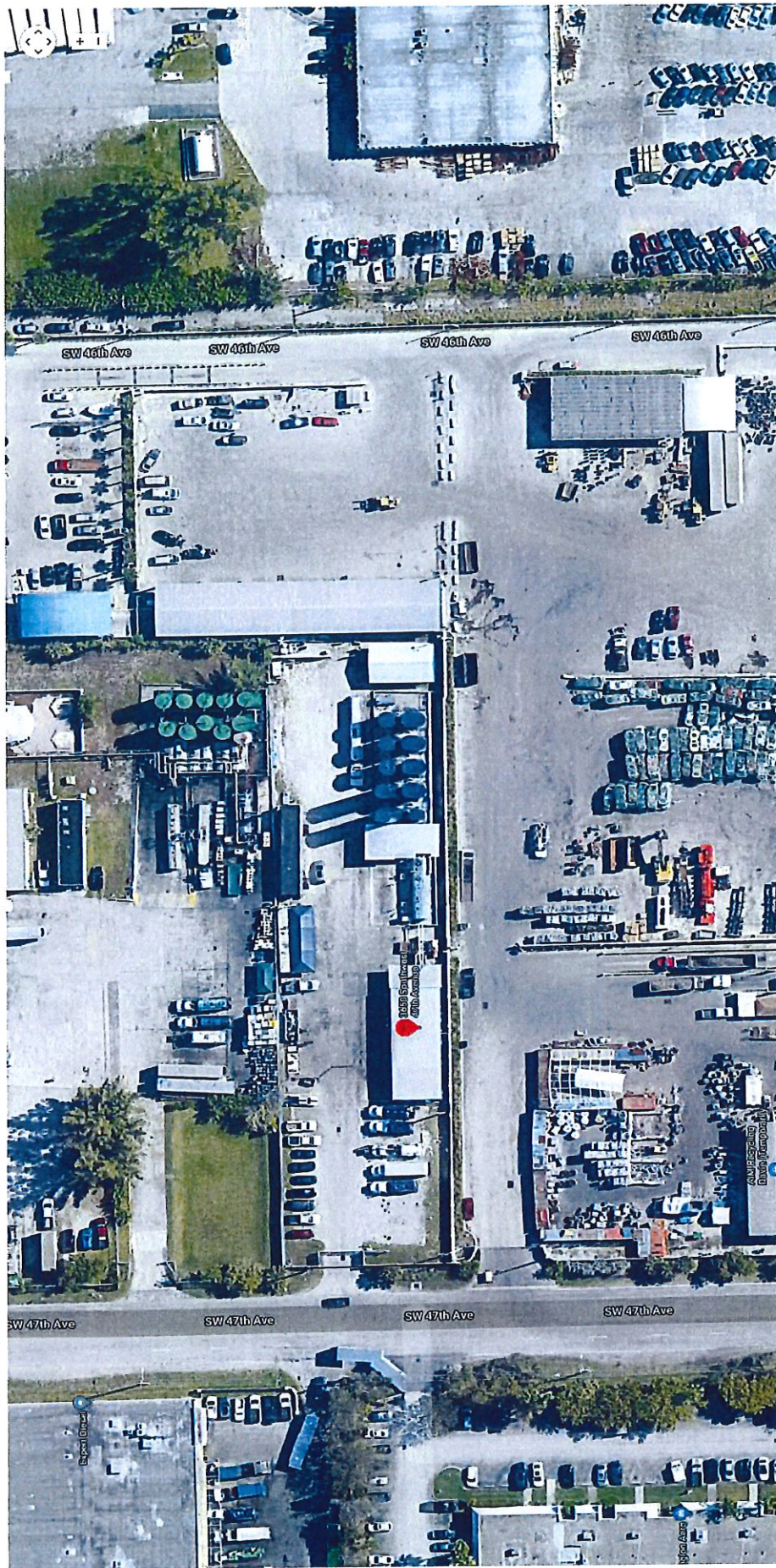
World Petroleum Corporation may also transport hazardous waste in roll-off containers. The storage capacity listed in the 8700-12 form includes the capacity for one (1) each forty cubic yard roll-off container.

Containers will be held for periods of time not to exceed 10 calendar days and will be shipped to permitted facilities with all proper documentation. Accumulating the waste affords World Petroleum Corporation both safety and economic benefits by transporting full trailers instead of smaller loads. Logs showing the arrival and departure dates of the containers will be maintained at the facility.

World Petroleum Corporation may consolidate waste from individual generators by transferring waste from 55-gallon drums into a roll-off container. Only identical waste streams from a single generator will be consolidated. The drums

will be opened only to transfer the waste into the roll-off container. No dust-generating waste will be consolidated. Transfer will be accomplished using a fork-lift.

All wastes will be received with the permitted disposal facility shown on the manifest. World Petroleum Corporation will not re-manifest waste and will not assume generator status for the wastes.





April 16, 2020

Florida Department of Environmental Protection
Southeast District – West Palm Beach
3301 Gun Club Road, MSC 7210-1
West Palm Beach, FL 33406

RE: Standard Operational Procedure for Hazardous Waste Transportation Violation

World Petroleum Corp is implementing the following SOP to ensure future hazardous waste transportation compliance:

Standard Operational Procedures

- 1: Customer calls and places an order to have their hazardous waste picked up.
- 2: World Petroleum contacts hazardous waste disposal company to confirm the customer's waste profile is approved and the waste can be accepted.
- 3: World Petroleum receives confirmation of what day the waste can be accepted and the hours of operation for accepting waste. World Petroleum will get written confirmation whenever possible.
- 4: Customer will be scheduled for hazardous waste pick-up by World Petroleum Corp within the 24 hours the hazardous waste disposal company can accept the waste.
- 5: Hazardous waste pick-ups will only be scheduled Monday -Thursdays. There will be no Friday pick-ups to ensure that if an issue should arise at the disposal facility no waste will be left on truck at the facility over the weekend and therefore in compliance with the 24-hour rule.

In addition to what has been outlined above, we have increased our hazardous waste disposal outlets so that we are not handcuffed by any ONE disposal company. We will use this as our current standard operational procedure. If in the future we are approved for a permit to become a hazardous waste transfer facility, we will again revise the SOP at that time.

Regards,



Andrea Miranda
World Petroleum Corp
954-327-0724