



Permit Renewal Application to Operate Used Oil and Material Processing Facility
(Form 62-710.901(6), F.A.C), and;

Application to Construct, Operate or Modify a Waste Processing Facility
(Form 62-701.900(4), F.A.C)

Prepared For:
Safety-Kleen Systems, Inc.

359 Cypress Road

Ocala, Florida 34472

EPA ID No.: FLR000060301

Permit Nos: 161967-10-HO; 161967-11-SO

February 2022

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PROJECT DESCRIPTION

PROJECT DESCRIPTION

The facility is presently authorized to operate under Permit No's 0161967-10-HO and 0161967-11-SO. These permits expire on April 22, 2022. Consistent with the requirements of the existing permits, Safety-Kleen Systems, Inc. (S-K) is submitting timely application for renewal of the permits. There have been no planned or implemented changes to the facility since the last permit renewal.

Safety-Kleen looks forward to working with the Department during the renewal process to ensure the timely re-issuance of the Used Oil Processing Facility and Solid Waste Facility permits for the Ocala facility.

Part I

USED OIL PROCESSING FACILITY PERMIT APPLICATION

Part I

TO BE COMPLETED BY ALL APPLICANTS (*Please type or print*)

A. General Information

1. New ☒ X ☐ Renewal ☐ Modification ☐ Date current permit expires April 22, 2022 ☐

2. Revision number ☐

3. NOTE: Used Oil Processors must also meet all applicable subparts, (**describe compliance in process description for applicable standards**) if they are:

☐ Generators (Subpart C of Part 279)

☐ Transporters (Subpart E)

☐ Burners of off-spec used oil (Subpart G)

☐ Marketers (Subpart H)

☒ X are disposing of used oil (Subpart I)

4. Date current operation began: January 1, 2000 ☐

5. Facility name: Safety-Kleen Systems, Inc.

6. EPA identification number: FLR000060301

7. Facility Location:

<u>359 Cypress Road</u>	<u>Ocala</u>	<u>FL</u>	<u>34472</u>
Street	City	State	Zip Code

8. Facility mailing address (if different from facility location):

<u>Street or P.O. Box</u>	<u>City</u>	<u>State</u>	<u>Zip Code</u>
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9. Contact person: Jeff Curtis Telephone: 561- 523-4719

Title: Sr. Environmental Compliance Manager Email: jeff.curtis@safety-kleen.com

Mailing Address:

<u>359 Cypress Road</u>	<u>Ocala</u>	<u>FL</u>	<u>34472</u>
Street or P.O. Box	City	State	Zip Code

10. Operator's name: Safety-Kleen Systems, Inc Telephone: 941-201-8176

Email:

Mailing Address:

<u>42 Longwater Drive</u>	<u>Norwell</u>	<u>MA</u>	<u>02061</u>
Street or P.O. Box	City	State	Zip Code

11. Facility owner's name: Safety-Kleen Systems, Inc Telephone: 941-201-8176

Email: _____

Mailing Address:

42 Longwater Drive Norwell MA 02061
Street or P.O. Box City State Zip Code

12. Legal structure:

☒ Corporation (indicate state of incorporation) Wisconsin

____ Individual (list name and address of each owner in spaces provided below)

____ Partnership (list name and address of each owner in spaces provided below)

____ Other, e.g., government (please specify) _____

____ Individual, partnership, or business operating under an assumed name (enter the county and state where the name is registered) County _____ State _____

Name: N/A

Mailing Address:

Street or P.O. Box City State Zip Code

Name: _____

Mailing Address:

Street or P.O. Box City State Zip Code

Name: _____

Mailing Address:

Street or P.O. Box City State Zip Code

Name: _____

Mailing Address:

Street or P.O. Box City State Zip Code

13. Site ownership status: ☒ owned ☐ to be purchased ☐ to be leased ____ years
☐ presently leased; the expiration date of the lease is: _____

If leased, indicate: Land owner's name: _____

Mailing Address:

Street or P.O. Box City State Zip Code

14. Name of professional engineer _____ Registration No. _____

Telephone: ____ - _____ Email: _____

Mailing Address:

Street or P.O. Box City State Zip Code

Associated with: _____

B. SITE INFORMATION

1. Facility location:
County: Marion
Nearest community: Ocala, Florida/ Silver Springs Shores
Latitude: 29/04/51 Longitude: 81/59/28
Section: 22 Township: 16 Range: 23
UTM # 403538.49/ EASTING /3217346.84/ NORTHING
2. Facility size (area in acres): ~12.3
3. Attach a topographic map of the facility area and a scale drawing and photographs of the facility showing the location of all past, present and future material and waste receiving, storage and processing areas, including size and location of tanks, containers, pipelines and equipment. Also show incoming and outgoing material and waste traffic pattern including estimated volume and controls.

Attachment A

C. OPERATING INFORMATION

1. Hazardous waste generator status (SQG, LQG, etc.) VSQG
2. List applicable EPA hazardous waste codes:

3. Attach a brief description of the facility operation, nature of the business, and activities that it intends to conduct, and the anticipated number of employees. No proprietary information need be included in this narrative.

A brief description of the facility operation is labeled as Attachment B

4. A detailed description of the process flow should be included. This description should discuss the overall scope of the operation including analysis, treatment, storage and other processing, beginning with the arrival of an incoming shipment to the departure of an outgoing shipment. Include items such as size and location of tanks, containers, etc. A detailed site map, drawn to scale, should be attached to this description. [See item four (4) of the instructions.]

The facility's detailed process description is labeled as Attachment C

5. The following parts of the facility's operating plan should be included as attachments to the permit application. [See item five (5) of the instructions.]
 - a. An analysis plan which must include:
 - (i) A sampling plan, including methods and frequency of sampling and analyses;
 - (ii) A description of the fingerprint analysis on incoming shipments, as appropriate; and
 - (iii) An analysis plan for each outgoing shipment (one batch/lot can equal a shipment provided the lots are discreet units) to include: metals and halogen content

The analysis plan is labeled as Attachment D

- b. A description of the management of sludges, residues and byproducts. This must include the characterization analysis as well as the frequency of sludge removal.

Sludge, residue and byproduct management description is labeled as Attachment E

- c. A tracking plan which must include the name, address and EPA identification number of the transporter, origin, destination, quantities and dates of all incoming and outgoing shipments of used oil.

The tracking plan is included as Attachment F

6. Attach a copy of the facility's preparedness and prevention plan. This requirement may be satisfied by modifying or expounding upon an existing SPCC plan. Describe how the facility is maintained and operated to minimize the possibility of a fire, explosion or any unplanned releases of used oil to air, soil, surface water or groundwater which could threaten human health or the environment. [See item six (6) of the instructions.]

The preparedness and prevention plan is labeled as Attachment G

7. Attach a copy of the facility's Contingency Plan. This requirement should describe emergency management personnel and procedures and may be met using a modifying or expounding on an existing SPCC plan or should contain the items listed in the Specific Instructions. [See item seven (7) of the instructions.]

The contingency plan is labeled as Attachment H

8. Attach a description of the facility's unit management for tanks and containers holding used oil. This attachment must describe secondary containment specifications, inspection and monitoring schedules and corrective actions. This attachment must also provide evidence that all used oil process and storage tanks meet the requirements described in item 8b of the specific instructions, and should be certified by a professional engineer, as applicable.

The unit management description is labeled as Attachment I

9. Attach a copy of facility's employee training for used oil management. This attachment should describe the methods or materials, frequency, and documentation of the training of employees in familiarity with state and federal rules and regulations as well as personal safety and emergency response equipment and procedures. [See item nine (9) of the instructions.]

A description of employee training is labeled as Attachment K

10. Attach a copy of the facility's Closure plan and schedule. This plan may be generic in nature and will be modified to address site specific closure standards at the time of closure. [See item ten (10) of the instructions.]

The closure plan is labeled as Attachment J

11.

The applicant must have an approved current dollar closing cost estimate using DEP Form 62-710.901(7), "Used Oil Processing Facility Closing Cost Estimate Form," before an application is considered complete. If not previously submitted pursuant to the requirements of Rule 62-710.800(6), F.A.C., and approved by the Department, attach DEP Form 62-710.901(7) here and send a copy to Financial.Assurance.Working.Group@floridadep.gov. [See item eleven (11) of the instructions.]

The current dollar cost estimate is dated February 9, 2021 and was approved by the Department on September 21, 2021. or

A current dollar cost estimate is labeled as Attachment _____. A copy has been sent to the Financial Assurance Working Group.

12. The applicant must have acceptable proof of financial assurance covering the current dollar Department approved closing cost estimate before the issuance of a permit. Original signature financial assurance documentation that meets the requirements of Rule 62-701.630(6), F.A.C. (pursuant to Rule 62-710.800(6), F.A.C.), must be submitted directly to the Financial Assurance Working Group (aka Solid Waste Financial Coordinator) at the address below. Because this documentation and approval letters may contain proprietary information, copies are not required to be part of the permit application itself. [See item twelve (12) of the instructions.]

Financial Assurance Working Group
Department of Environmental Protection
Permitting & Compliance Assistance Program
2600 Blair Stone Rd. MS 4548
Tallahassee, FL 32399-2400

Financial assurance (FA) documentation was submitted to the Department and the most recent FA compliance letter is dated September 21, 2021, or

Financial assurance documentation will be submitted to the Department after the attached estimate is approved _____ (check if appropriate).



Florida Department of Environmental Protection

Bob Martinez Center
2600 Blair Stone Road
Tallahassee, Florida 32399-2400

DEP Form #: 62-701.900(4), F.A.C.

Form Title: Application to Construct, Operate, or
Modify a Waste Processing Facility

Effective Date: February 15, 2015

Incorporated in Rule: 62-701.710(2), F.A.C.

APPLICATION TO CONSTRUCT, OPERATE, OR MODIFY A WASTE PROCESSING FACILITY

GENERAL REQUIREMENT: Solid Waste Management Facilities shall be permitted pursuant to Section 403.707, Florida Statutes (F.S.) and in accordance with Florida Administrative Code (F.A.C.) Chapter 62-701. A permit application shall be submitted in accordance with the requirements of Rule 62-701.320(5)(a), F.A.C., to the Department District Office having jurisdiction over the facility. The appropriate fee in accordance with subsection 62-701.315(4), F.A.C., shall be submitted with the application by check made payable to the Department of Environmental Protection (DEP). Complete appropriate sections for the type of facility for which application is made and include all additional information, drawings, and reports necessary to evaluate the facility.

Please Type or Print in Ink

A. GENERAL INFORMATION

1. Type of facility (check all that apply):

☐ Transfer Station:

☐ C&D

☐ Class III

☐ Class I

☐ Other Describe: _____

☒ Materials Recovery Facility:

☐ C&D Recycling

☐ Class III MRF

☐ Class I MRF

☐ Other Describe: Used Oil and Material Processing Facility

☒ Other Facility That Processes But Does Not Dispose Of Solid Waste On-Site:

☐ Storage, Processing or Disposal for Combustion Facilities (not addressed in another permit)

☐ Other Describe: Used Oil and Material Processing Facility

NOTE: C&D Disposal facilities that also recycle C&D, shall apply on DEP FORM 62-701.900(6), F.A.C.

2. Type of application:

☐ Construction/Operation

☒ Operation without Additional Construction

3. Classification of application:

☐ New

☐ Substantial Modification

☒ Renewal

☐ Intermediate Modification

☐ Minor Modification

4. Facility name: Safety-Kleen Systems, Inc.

5. DEP ID number: 0161967 County: Marion

6. Facility location (main entrance): 359 Cypress Road, Ocala FL 34472

7. Location coordinates:
Section: 22 Township: 16 Range: 23
Latitude: 29 ° 04 ' 51 " Longitude: 81 ° 59 ' 28 "
Datum: NA Coordinate Method: NA
Collected by: NA Company/Affiliation: NA
8. Applicant name (operating authority): Safety-Kleen Systems, Inc.
Mailing address: 359 Cypress Road, Ocala FL 34472
Street or P.O. Box City State Zip
Contact person: Jeff Curtis Telephone: (561) 523-4719
Title: Sr. Environmental Compliance Mgr. jeff.curtis@safety-kleen.com
E-Mail address (if available)
9. Authorized agent/Consultant: N/A
Mailing address: _____
Street or P.O. Box City State Zip
Contact person: _____ Telephone: (561) 523-4719
Title: _____
E-Mail address (if available)
10. Landowner (if different than applicant): Safety-Kleen Systems, Inc.
Mailing address: 42 Longwater Drive, Norwell MA 02061
Street or P.O. Box City State Zip
Contact person: Jeff Curtis Telephone: (561) 523-4719
jeff.curtis@safety-kleen.com
E-Mail address (if available)
11. Cities, towns and areas to be served: Marion County/Central Florida
12. Date site will be ready to be inspected for completion: N/A
13. Estimated costs:
Total Construction: \$ N/A Closing Costs: \$ See attachments
14. Anticipated construction starting and completion dates:
From: N/A already constructed To: _____
15. Expected volume of waste to be received: variable yds³/day variable tons/day

16. Provide a brief description of the operations planned for this facility: Please see enclosed application and related attachments for description of operations.
-
-

B. ADDITIONAL INFORMATION

Please attach the following reports or documentation as required.

1. Provide a description of the operation of the facility that shall include (62-701.710(2)(a), F.A.C.):
 - a. The types of materials, i.e., wastes, recyclable materials or recovered materials, to be managed or processed;
 - b. The expected daily average and maximum weights or volumes of materials to be managed or processed;
 - c. How the materials will be managed or processed;
 - d. How the materials will flow through the facility including locations of the loading, unloading, sorting, processing and storage areas;
 - e. The types of equipment that will be used;
 - f. The maximum time materials will be stored at the facility;
 - g. The maximum amounts of wastes, recyclable materials, and recovered materials that will be stored at the facility at any one time; and
 - h. The expected disposition of materials after leaving the facility.
2. Attach a site plan, signed and sealed by a professional engineer registered under Chapter 471, F.S., with a scale not greater than 200 feet to the inch, which shows the facility location, total acreage of the site, and any other relevant features such as water bodies or wetlands on or within 200 feet of the site, potable water wells on or within 500 feet of the site (62-701.710(2)(b), F.A.C.).
3. Provide a boundary survey and legal description of the property (62-701.710(2)(c), F.A.C.).
4. Provide a construction plan, including engineering calculations, that describes how the applicant will comply with the design requirements of subsection 62-701.710(3), F.A.C. (62-701.710(2)(d), F.A.C.).
5. Provide an operation plan that describes how the applicant will comply with subsection 62-701.710(4), F.A.C. and the recordkeeping requirements of subsection 62-701.710(8), F.A.C. (62-701.710(2)(e), F.A.C.).
6. Provide a closure plan that describes how the applicant will comply with subsection 62-701.710(6), F.A.C. (62-701.710(2)(f), F.A.C.).
7. Provide a contingency plan that describes how the applicant will comply with subsection 62-701.320(16), F.A.C. (62-701.710(2)(g), F.A.C.).
8. Unless exempted by subparagraph 62-701.710(1)(d)1., F.A.C., provide the financial assurance documentation required by subsection 62-701.710(7), F.A.C. (62-701.710(2)(h), F.A.C.).
9. Provide a history and description of any enforcement actions by the applicant described in subsection 62-701.320(3), F.A.C. relating to solid waste management facilities in Florida. (62-701.710(2), F.A.C. and 62-701.320(7)(i), F.A.C.)
10. Provide documentation that the applicant either owns the property or has legal authorization from the property owner to use the site for a waste processing facility (62-701.710(2), F.A.C. and 62-701.320(7)(g), F.A.C.)

C. CERTIFICATION BY APPLICANT AND ENGINEER OR PUBLIC OFFICER

1. Applicant:

The undersigned applicant or authorized representative of Safety-Kleen Systems, Inc.

is aware that statements made in this form and attached information are an application for a Waste Processing Facility

Permit from the Florida Department of Environmental Protection and certifies that the information in this application is true, correct and complete to the best of his/her knowledge and belief. Further, the undersigned agrees to comply with the provisions of Chapter 403, Florida Statutes, and all rules and regulations of the Department. It is understood that the Permit is not transferable, and the Department will be notified prior to the sale or legal transfer of the permitted facility.



Signature of Applicant or Agent

Jeff Curtis, Sr. Environmental Compliance Mgr.

Name and Title (please type)

jeff.curtis@safety-kleen.com

E-Mail address (if available)

359 Cypress Road

Mailing Address

Ocala FL 34472

City, State, Zip Code

(561) 523-4719

Telephone Number

1/23/2022

Date

Attach letter of authorization if agent is not a governmental official, owner, or corporate officer.

2. Professional Engineer registered in Florida (or Public Officer if authorized under Sections 403.707 and 403.7075, Florida Statutes):

This is to certify that the engineering features of this waste processing facility have been designed/examined by me and found to conform to engineering principles applicable to such facilities. In my professional judgment, this facility, when properly maintained and operated, will comply with all applicable statutes of the State of Florida and rules of the Department. It is agreed that the undersigned will provide the applicant with a set of instructions of proper maintenance and operation of the facility.



Signature

N.D. Eryou, P.E.

Name and Title (please type)

5051 Castello Drive

Mailing Address

Naples, FL 34103

City, State, Zip Code

dennis@eryouengineering.com

E-Mail address (if available)

(561) 449-5814

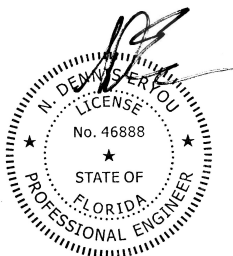
Telephone Number

1/24/2022

Date

46888

Florida Registration Number
(please affix seal)



B. ADDITIONAL INFORMATION

Please attach the following reports or documentation as required.

1. Provide a description of the operation of the facility that shall include (62-701.710(2)(a), F.A.C.):
 - a. The types of materials, i.e., wastes, recyclable materials or recovered materials, to be managed or processed;
 - b. The expected daily average and maximum weights or volumes of materials to be managed or processed;
 - c. How the materials will be managed or processed;
 - d. How the materials will flow through the facility including locations of the loading, unloading, sorting, processing and storage areas;
 - e. The types of equipment that will be used;
 - f. The maximum time materials will be stored at the facility;
 - g. The maximum amounts of wastes, recyclable materials, and recovered materials that will be stored at the facility at any one time; and
 - h. The expected disposition of materials after leaving the facility.

Please See Attachment A for a detailed description of facility operations, which includes responses to items 1a through 1h.

2. Attach a site plan, signed and sealed by a professional engineer registered under Chapter 471, F.S., with a scale not greater than 200 feet to the inch, which shows the facility location, total acreage of the site, and any other relevant features such as water bodies or wetlands on or within 200 feet of the site, potable water wells on or within 500 feet of the site (62-701.710(2)(b), F.A.C.).

Please See Attachment A for the Site Plan.

3. Provide a boundary survey and legal description of the property (62-701.710(2)(c), F.A.C.).

Please refer to Attachments A and B for this element.

4. Provide a construction plan, including engineering calculations, that describes how the applicant will comply with the design requirements of subsection 62-701.710(3), F.A.C. (62-701.710(2)(d), F.A.C.).

Please refer to Attachments A and B for a discussion of this topic.

5. Provide an operation plan that describes how the applicant will comply with subsection 62-701.710(4), F.A.C. and the recordkeeping requirements of subsection 62-701.710(8), F.A.C. (62-701.710(2)(e), F.A.C.).

A copy of the Operation Plan is provided in Attachments B, C, and D.

6. Provide a closure plan that describes how the applicant will comply with subsection 62-701.710(6), F.A.C. (62-701.710(2)(f), F.A.C.).

A copy of the Closure Plan is provided in Attachment J.

7. Provide a contingency plan that describes how the applicant will comply with subsection 62-701.320(16), F.A.C. (62-701.710(2)(g), F.A.C.).

A copy of the contingency plan is provided in Attachment H

8. Unless exempted by subparagraph 62-701.710(1)(d) 1., F.A.C., provide the financial assurance documentation required by subsection 62-701.710(7), F.A.C. (62-701.710(2)(h), F.A.C.).

A copy of the financial assurance documentation is enclosed.

9. Provide a history and description of any enforcement actions by the applicant described in subsection 62-701.320(3), F.A.C. relating to solid waste management facilities in Florida. (62-701.710(2), F.A.C. and 62-701.320(7)(i), F.A.C.)

Safety-Kleen is unaware of any enforcement actions taken at its Florida facilities meeting the context of the definition provided in 62-701.320(3), F.A.C. (Irresponsible Applicant definition).

10. Provide documentation that the applicant either owns the property or has legal authorization from the property owner to use the site for a waste processing facility (62-701.710(2), F.A.C. and 62-701.320(7)(g), F.A.C.)

Please see attached Marion County 2016 TRIM Notice identifying Safety Kleen Systems, Inc. as the property owner.

Attachment A

Contour Map, Scale Drawings, Photographs, Traffic Patterns

Attachment A- Maps, Drawings and Photos

Figure A-1 provides a topographic site map of the area surrounding the S-K Ocala facility. The facility is located at 359 Cypress Road, Ocala Florida.

Figure A-2 illustrates the locations of FEMA-designated Zone A flood zones. Flood hazard areas identified on the Flood Insurance Rate Map are identified as a Special Flood Hazard Area (SFHA). SFHA are defined as the area that will be inundated by the flood event having a 1-percent chance of being equaled or exceeded in any given year. The 1-percent annual chance flood is also referred to as the base flood or *100-year flood*. The Zone A designated flood zones are identified by the areas shaded in blue on Figure A-2. This data was obtained from the Marion County Information Technology Department and presents 2008 FEMA-provided data.

Figure A-3 illustrates the major material and waste receiving, storage and processing areas, and the locations of tanks, containers, pipelines and equipment. This figure also indicates the anticipated maximum annual material flows for all used oil and solid waste activities. A detailed discussion of all used oil and solid waste processing activities is provided in Attachment C of the application. Please note that activity levels and processing quantities for the on-site Distribution Center are not included in these values, as those planned activities do not fall under the purview of this application.

Figure A-4 illustrates key waste receiving, storage and processing areas of the facility. Additional detail and specifications on the tanks is provided in the SPCC Plan, Table 3 (See Attachment G).

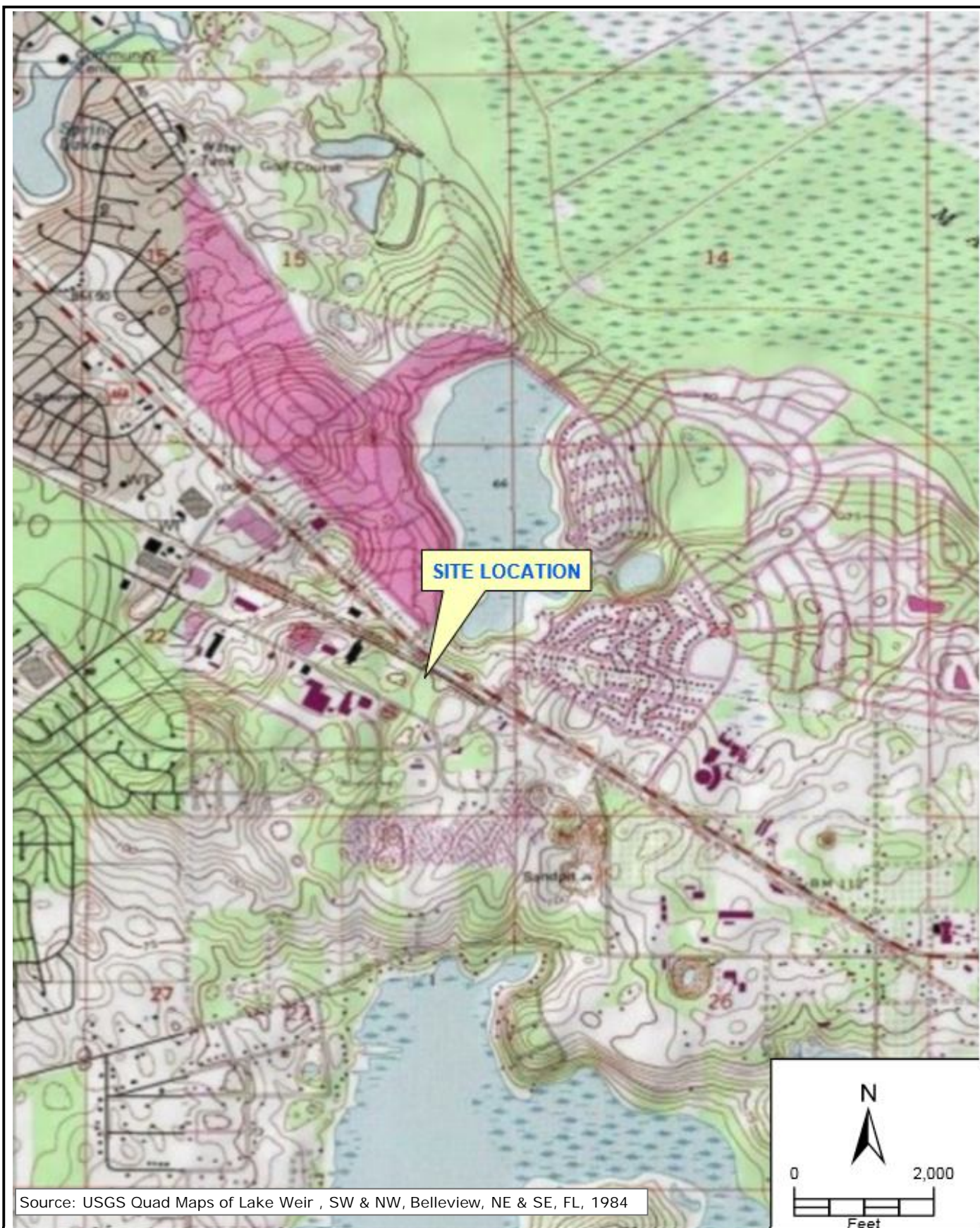


FIGURE A1- SITE VICINITY MAP
SAFETY-KLEEN SYSTEMS, INC.
OCALA , FLORIDA

safety-kleen.
PROTECTION-CHOICES-PEOPLE
MAKE GREEN WORK

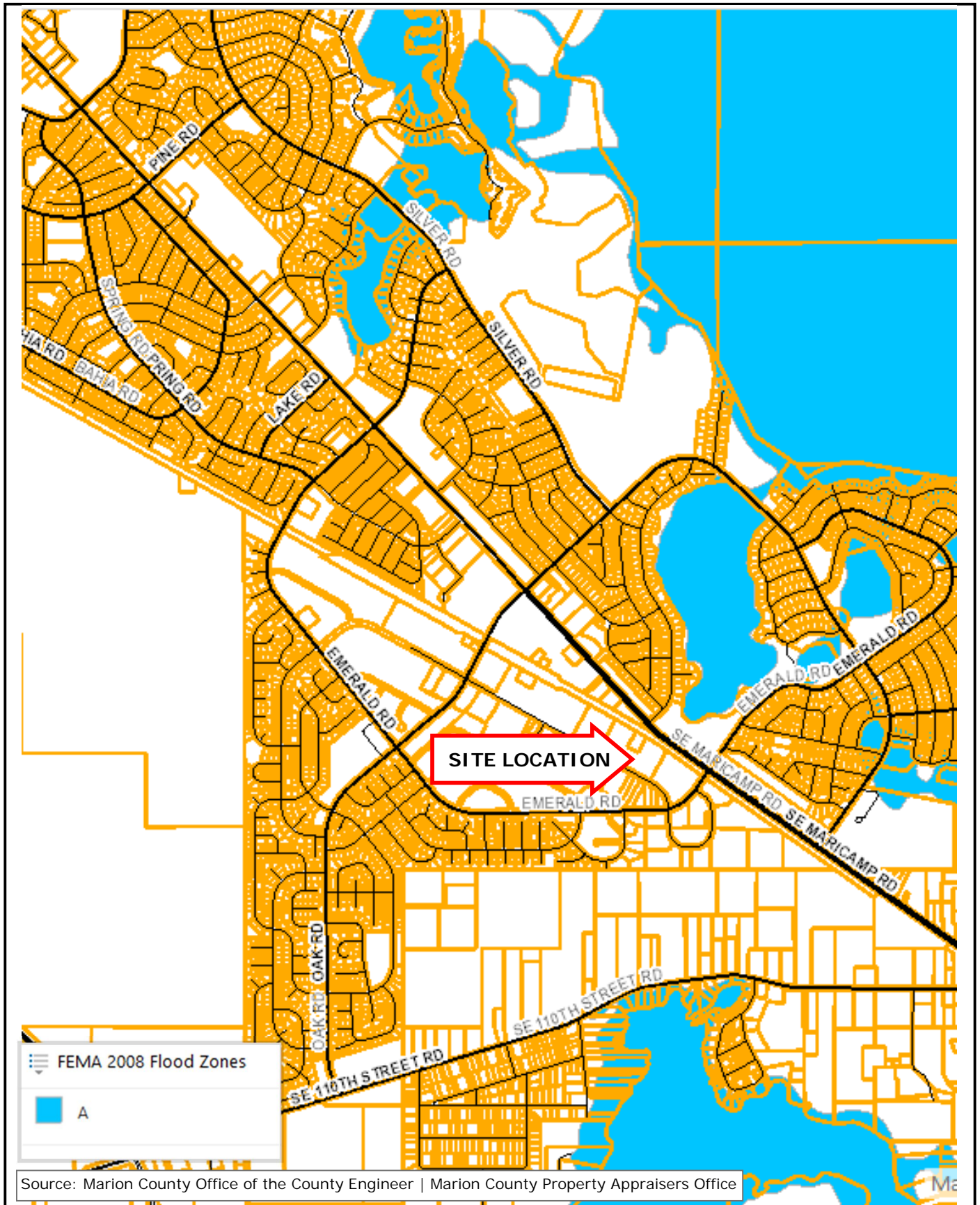


FIGURE A2- 100-YEAR FLOOD ZONE
SAFETY-KLEEN SYSTEMS, INC.
OCALA, FLORIDA

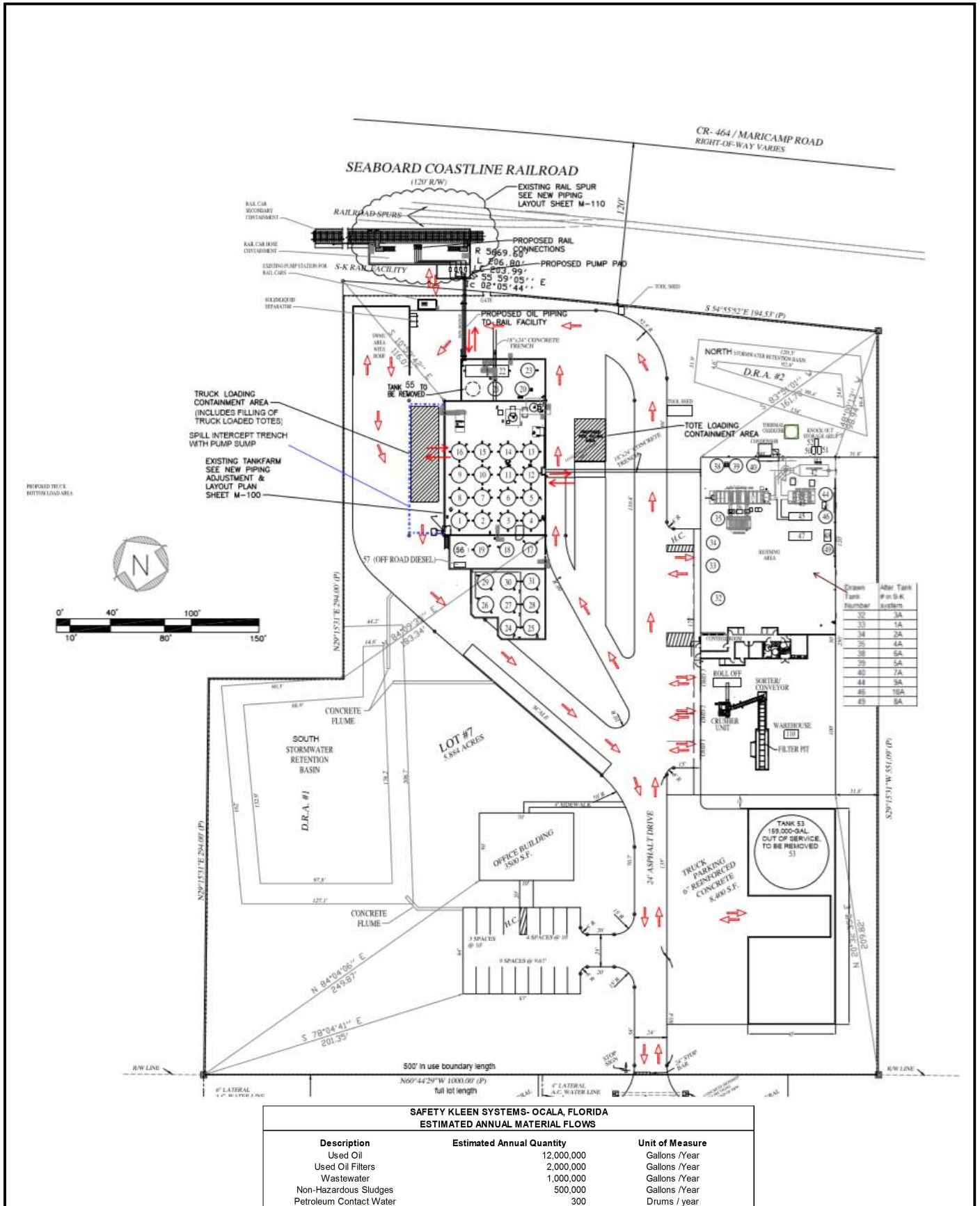


FIGURE A3- SITE PLAN AND OUTGOING MATERIAL AND WASTE TRAFFIC PATTERNS
SAFETY-KLEEN SYSTEMS, INC.
OCALA , FLORIDA

safety-kleen.
PROTECTION-CHOICES-PEOPLE
MAKE GREEN WORK



Driveway between Main Tank Farm Storage Area and Warehouse Building-South elevation



Main Tank Farm Storage area-NW elevation



Main Tank Farm Storage area-SE elevation



Oil Filter Crusher-Warehouse building



Oil Filter Bins



Solid Waste Management Area



Drive way between MTFSA and Solid waste Roll-offs

FIGURE A4- PHOTOS- KEY RECEIVING,
STORAGE AND PROCESSING AREAS
SAFETY-KLEEN SYSTEMS, INC.
OCALA , FLORIDA

Attachment B

Brief Facility Description

FACILITY DESCRIPTION

This is an existing facility that is engaged in the processing of used oil, used oil filters and certain non-hazardous solid wastes. In addition, the facility stores, and transfers used antifreeze. The facility has forty-eight (48) above ground storage tanks ranging from 500 gallons to 159,000 gallons. Twenty (20) of these tanks with a total capacity of 453,900 gallons are either fuel oil or used oil tanks. The rail spur area generally holds three (3) to four (4) rail cars with 25,000 gallons capacity each on- site. In addition, there are 9 vessels involved in the processing of used oil located in the processing area of the warehouse. All tanks are listed in Attachment B. The processing and wastewater treatment system is situated within an enclosed building that is constructed on a 6-inch reinforced, sealed concrete slab. The processing area of the facility is approximately 13,000 square feet (ft²) and occupies the north side of the warehouse building. The warehouse/drum storage and used oil filter processing areas occupy approximately 13,000 (ft²) and is constructed on an 8-inch reinforced, sealed concrete slab.

Currently, 9 employees work at the Ocala facility. The facility is currently authorized to operate under Permit No.'s 0161967-10-HO and 0161967-11-SO. These permits expire on April 22, 2022. Since the issuance of Permit 0161967- 10-HO/0161967-11-SO, there have been no changes in operations at the facility.

Attachment C

Facility Detail Process Description

DETAILED PROCESS DESCRIPTION

The Safety-Kleen Systems, Inc. Ocala facility is primarily engaged in processing of used oil into recycled fuel oil (RFO), and processing used oil filters. In addition, the facility processes and bulks certain nonhazardous solid waste streams for transport to a solid waste landfill. The facility also conducts the storage of used oil, non-hazardous industrial wastewater, used antifreeze, used oil filters (prior to crushing), and other petroleum contaminated materials. The facility is located in Ocala, Florida. Used oil and related used oil products (filters, etc.) may come from a variety of sources including, but not limited to:

- Automotive and industrial used oil lubricants, coolants and wash waters;
- Bilge slop/wash waters from the shipping industry;
- Wastewater and oils from storage tanks, pits, ponds and containments from manufacturing operations;
- Wastewater and oils from petroleum storage facilities;
- Petroleum contact water as defined in Chapter 62-740, Florida Administrative Code (F.A.C.), and;
- Solid waste from industrial generators (primarily oil filter and used oil containers).

Safety-Kleen is dedicated to the transfer operations of industrial wastewater, petroleum contact water (PCW) and contaminated petroleum products through a relatively simple process which recovers petroleum product and then stores the industrial wastewater prior to shipment to a permitted pre- treatment facility or onsite disposal by dehydrated distillation. The offsite permitted pretreatment facility pretreats the industrial waste and discharges it to a permitted publicly owned treatment works (POTW). Safety-Kleen markets "used oil" for resale as industrial burner fuel. The processed "used oil" is called "recycled fuel oil" (RFO).

Safety-Kleen also processes solid waste in the Solid Waste Management Area (SWMA) of the facility. The solid waste to be accepted, processed, stored or otherwise managed at the facility are as follows:

- used oil filter media (paper/plastics) from the used oil filter processing system,
- petroleum contaminated soil,
- petroleum contaminated sorbet materials (e.g. pads, booms, rags, vermiculite, etc.),
- personal protective equipment (PPE),
- petroleum contaminated debris associated with a spill such as gravel, rock, concrete, asphalt and de minimus quantities of other petroleum contaminated solid wastes,
- petroleum tank bottom sludges from petroleum storage tank systems regulated pursuant to Chapter 62-761, F.A.C.,
- non-regulated petroleum storage tank systems, pits, containment areas, sumps and tanks, petroleum contaminated water (PCW) as defined in Rule 62-740.030(1), F.A.C.,
- petroleum contaminated sediments, sludges and liquids that originate from oil/water separators at residential car washes, rollover car washes, and tunnel car washes as defined in Rule 62- 660.803(3), F.A.C.,
- empty petroleum contaminated drums, pails, gas tanks, and fuel filters not otherwise constituting “used oil”, and
- non-hazardous, non-liquid waste streams generated from the on-site used oil processing and industrial wastewater pretreatment facilities.

Attachment A, Figure A3, *Site Plan and Outgoing Material and Waste Traffic Patterns*, provides a scale site map illustrating the locations of the major process areas subsequently discussed in Attachment C. The facility has two buildings: the main office and the warehouse building. Other structures at the facility include a tank farm, a drum storage area (inside the warehouse), a used oil processing system (inside the warehouse), a chemical storage building (inside the warehouse), five loading/unloading areas and a solid waste processing area inside the SWMA. The core mission of this facility is to: 1) Receive, store, process, treat and market used oil, 2) Receive, store and process (crush) used oil filters, 3) Generate, receive, store, transfer and ship offsite industrial wastewater; 4) Generate, receive, store, transfer and process solid waste, and 5) Receive, package and distribute product re-refined oils and blended lubricants to a variety of customers throughout the region.

The activities that Safety-Kleen will conduct include used oil storage, used oil processing, used

oil treatment, used oil marketing, used oil filter processing, used oil filter storage, used oil filter transfer operations, solid waste storage, solid waste solidification and solid waste transfer operations for disposal or treatment at an off-site permitted facility. Safety-Kleen Ocala is a used oil processor as defined in Chapter 62-710.201(3) because: it processes used oil, operates as a transfer facility that stores used oil for longer than 35 days at a time, and is a used oil fuel marketer who receives used oil from transporters and who has at least 25,000 gallons of used oil storage capacity. Used oil is stored in tanks and containers. Used oil filters and used oil residuals are stored in containers or covered roll-off boxes. Solid waste will be stored in containers or roll-off boxes and will be processed in the SWMA. Solid wastes will be accepted at the facility in two locations. Containers of eighty-five (85) gallons or less will be off-loaded at the drum storage area, and larger containers (bulk) will be taken directly to the solid waste management area (SWMA) and off-loaded into the mix pit. From the drum storage area, properly sealed containers on pallets will be transferred to the SWMA via forklift and emptied into the SWMA where the material will be solidified using lime dust (or like material). The materials will then be placed into roll-off boxes, covered and then transported to a permitted solid waste facility for disposal. Solid waste containers will be stored in the drum storage area for no longer than two (2) weeks before being transferred to the SWMA for processing and solidification. Processed solid waste roll-off boxes will be covered and stored at the SWMA for no longer than four (4) weeks before transport to a permitted solid waste facility for disposal.

FACILITY OPERATIONS

Truck tanker loading and unloading occurs on the concrete slabs or asphalt areas located to the east or west of the tank farm. Rail tanker loading and unloading occurs in the concrete secondary containment at the north end of the facility. Typical annual volumes are:

- Wastewater: 1 million gallons per year (GPY);
- Used oil: 12 million GPY;
- Used oil filters: 3,000,000 GPY;
- Nonhazardous sludges: 500,000 GPY; and
- Petroleum contaminated materials, (i.e., absorbents, solids, sludges): 300 drums per year.

Oil and wastewaters are transferred from the tank farm area to the processing area via an overhead double walled piping system. All drum and sludge materials are handled within the 10,000 square feet (ft²) warehouse area or the SWMA. Absorbents and soils are consolidated from drums and will be placed into roll-off boxes at the SWMA for transportation to a permitted treatment or disposal facility. Solid waste is stored in the designated area of the warehouse. Solid waste is processed in the SWMA at the northwest corner of the facility. The facility has a fence surrounding the property as a deterrent for unauthorized entry.

PROCESSING UNIT

Situated near the northeast corner of the site is the processing and oil dehydration system. The entire system area is in-doors with walls on all sides and a roof. The floor is constructed of 6-inch thick reinforced concrete. Concrete berms and sumps exist below the surface level of the foundation. All concrete is sealed with an epoxy coating. The containment berms are constructed of solid concrete and also are sealed to a height of 4 inches above floor level with the same type of sealer mentioned above. The roof cover is metal in this area. The area of the processing units is approximately 12,000 ft².

TANK FARM STORAGE AREA

Situated near the southwest corner of the subject site is the Main Tank Farm Storage Area (MTFSA). The storage area is outside and is enclosed by concrete walls on all sides. The floor is constructed of 8-inch thick, reinforced concrete. Concrete berms and sumps exist below the surface level of the foundation. All concrete is sealed with epoxy coating. The containment walls are constructed of concrete masonry units with concrete filled cells. The containment walls are sealed to a height of 4-ft above floor level with the same type of sealer mentioned above. There is no roof cover. The area of the main tank farm is 7,500 (ft²). Two additional tank-receiving areas were constructed during 2001-2002. The two additional storage tank areas were constructed north and south of the existing MTFSA. The construction was similar to the existing MTFSA. The area of the North Tank Farm is approximately 1,890 ft². The area of the South Tank

Farm (STFA) is approximately 1,800 ft². The North and South Tank Farm secondary containment areas are connected to the Main Tank Farm Storage Area. A second area south of the South Tank Farm (STFA) was constructed in 2004. The Southern Tank Farm Area (SNTFA) covers approximately 2,448 ft². A new Used Oil/Industrial Wastewater Storage Area (UOIWWSA) covering 10,400 ft² was added in 2005 and started service January 19, 2007. The UOIWWSA is presently not in operation, and there are no plans to place it into service at this time. The last remaining tank in this area (Tank #53) is scheduled for removal at a yet to be determined date.

The MTFSA has 16 tanks (#'s 1-16), each with a capacity of 30,000 gallons for storage of finished product (recycled fuel oil), unprocessed used oil (used oil), or product re-refined oils and blended lubricants. Tank numbers 1,2,7,8,9,10,13,14,15 & 16 contain product re-refined oil or blended lubricants. Tank numbers 3,4,5,6, 11 & 12 contain recycled fuel oil or used oil.

The South Tank Farm (SFTA) has 3 tanks (#'s 17-19), each with a capacity of 20,000 gallons for receiving industrial wastewater. The South Tank Farm (STFA) also has a storm water tank (#56) with a capacity of 14,100 gallons. The South Tank Farm (SFTA) also has a 1,100-gallon diesel fuel tank (#57) that is no longer in service.

The North Tank Farm (NTF) has 5 tanks. Tanks 20 and 21 are for storage of industrial wastewater and each have 20,000 gallons capacity. Tank 23 is for storage of product antifreeze and has a capacity of 20,000 gallons. Tank 22 is for storage of used antifreeze and has a capacity of 20,000 gallons. Tank 55: previously used for storage of stormwater with a capacity of 9,400 gallons has been removed. Tank 55 is now a 500 gallon off-road diesel tank.

The Southern Tank Farm Area (SNFTA) has 8 tanks each with a capacity of 30,000 gallons. The tanks are numbered 24-31. These tanks are used to store used oil.

The UOIWWSA has one (1) tank, with a capacity of 159,000 gallons. The tank is numbered 53. Tank 53 is not currently in use, and there are no plans to put this tank into use. It is scheduled for removal at a yet to be determined date. If anything changes with respect to this tank, Safety-Kleen will notify the Department beforehand.

DRUM/SLUDGE WAREHOUSE FACILITY

The warehouse/drum storage area is approximately 10,000 ft² and is located along the south section of the processing plant. The chemical storage area is located within this zone and is situated within the above-mentioned containment. The area of the warehouse/drum storage unit and used oil filter processing area is approximately 10,000 ft². Used oil filters will be off-loaded into the “filter pit” inside the warehouse, then sorted while being transferred to the crusher unit on a conveyer belt. Once the filters are crushed, they are placed into roll-off boxes and sent to a metal recycler.

SOLID WASTE MANAGEMENT AREA (SWMA)

The SWMA includes the area inside the south end of the warehouse (drum storage area) and the solidification area (northwest corner of the facility). Solid waste is stored in the south part of the warehouse for drum storage and taken to the solidification area for processing. Solid waste is processed by solidification in the SWMA located at the northwest corner of the facility. The SWMA is constructed of epoxy-sealed concrete floor with a sump and a fixed roof. A roll-off box is staged at the work area for storing processed solid waste. The solids processed by Safety-Kleen are either generated onsite as a result of used oil processing and industrial wastewater transfer operations or they are received from offsite. The solidification agent and solids are mixed together to form a drier and more stable mixture.

Samples are collected for the required disposal or treatment analysis. Upon waste stream approval, the waste is loaded into trucks and shipped for disposal or treatment. Processed solids are shipped offsite in roll-off boxes. The processed solids are shipped to facilities that are permitted as thermal treatment facilities (F.A.C. 62-775) or Class I landfills (F.A.C. 62-701) by the Florida Department of Environmental Protection.

The total number of employees at this time is 9. The office staff includes: one administrator, one Plant Manager, and one plant supervisor. The number of field personnel may vary according to business conditions.

PROCESS FLOW

Prior to scheduling a load to be received, Safety-Kleen requires a specific amount of information be provided about the incoming waste stream. All non-hazardous waste streams proposed to be accepted at the facility are required to be reviewed and approved through the Safety-Kleen profiling system. In general, a profile is submitted to the Central Profiling Group (CPG) with information regarding the specific waste stream including SDS's, generator process knowledge, and any analytical data that may have been completed on that waste stream. This information is reviewed by a waste review chemist. Once approved, the profile is sent to the generator for review and approval.

RECEIVING/PROCESSING AREA

The Aboveground Storage Tank Farms are located outside. The secondary containment system consists of concrete floors, concrete sumps and concrete walls enclosing the entire tank farm. All concrete is sealed. The Main Tank Farm Storage Area (MTFSA) contains sixteen 30,000-gallon aboveground storage tanks (ASTs) located inside the secondary containment area. These ASTs are used to store used oil, recycled fuel oil, and product re-refined oils & blended lubricant oils. The tank numbers are 1 through 16. As mentioned previously, Tanks 1,2,7,8,9,10,13,14,15 & 16 contain product re-refined oil or blended lubricants. Tanks 3,4,5,6, 11 & 12 contain recycled fuel oil (RFO) or used oil.

The South Tank Farm Area (STFA) contains three 20,000 gallon tanks (#'s 17-19) for receiving industrial wastewater, one 14,100 gallon tank for storage of stormwater, and one 1,100 gallon tank for storage of off-road diesel fuel (this tank is not currently in service). The North Tank Farm (NTF) has two tanks with a capacity of 20,000 gallons for receiving Industrial Wastewater (#'s 20, 21), one tank with a capacity of 20,000 gallons for storage of used antifreeze (#22), one tank with a capacity of 20,000 gallons for storage of product antifreeze, and one tank with a capacity of 500 gallons for storage of off-road diesel fuel. The Southern Tank Farm Area (SNTFA) has 8 tanks, each with a capacity of 30,000 gallons. The tanks are numbered (24-31) and are used to store used oil. The UOIWWSA contains one tank with a capacity of 159,000 gallons. This tank is numbered 53. Tank 53 is not currently in use, and there are no plans to put it into use at this

time. If anything changes with respect to this tank Safety-Kleen will notify the Department beforehand.

Used oil is separated from water content by physical and/or chemical means. The wastewater is then transferred to a permitted offsite industrial wastewater pretreatment facility. A shaker or filter is used to separate solids from used oil. The remaining used oil is then further processed via chemical and physical means. Blending can also occur within this area. Safety-Kleen personnel send all samples off-site for analyses.

INDUSTRIAL WASTEWATER STORAGE AREA

The location of the UOIWWSA is shown in Appendix B. UOIWWSA is comprised of one 159,000-gallon storage tank, a loading/unloading area and transfer pumps. This unit is presently not operational, and there are no plans to put it into operation. If anything changes with respect to this area Safety-Kleen will notify the Department beforehand.

REBUTTABLE PRESUMPTION

Safety-Kleen and/or any contracted used oil transporter will test all loads destined for the Ocala facility for total halogens by testing a representative sample of the load using the Dexsil® Halogen Test Kit or its' functional equivalent. Any used oil which is found to demonstrate potential hazardous characteristics by testing greater than >1,000 parts per million (ppm) for total halogens and does not meet the rebuttable presumption will be handled as hazardous waste according to 40 CFR Parts 260 through 266, 268, 270, and 124. Safety-Kleen will handle hazardous waste by transporting it via a licensed hazardous waste transporter to a permitted RCRA Storage, Treatment, and Disposal Facility for proper storage, treatment, or disposal. Safety-Kleen will store hazardous waste in proper containers that are closed except when adding or removing waste from the container. The hazardous waste containers will be properly marked with the words "HAZARDOUS WASTE" and the accumulation start date. The hazardous waste containers will be inspected on a weekly basis. Used oil that tests greater than >1,000 ppm halogens will only be accepted if the generator has successfully rebutted the rebuttable

presumption. Records of will be maintained by Safety-Kleen for at least three years.

TRANSPORTATION

All used oil will be tested as described above. All used oil transported by Safety-Kleen will be delivered to the Ocala facility for processing or transfer. Safety-Kleen will comply with all U.S. Department of Transportation regulations as described in 49 CFR 100-199, which are applicable to S-K standard operation(s). Each vehicle utilized for transporting used oil will contain an In-Transit Emergency Response Procedures Plan, cellular/two-way radio/phone, fire extinguisher, and Spill Containment Material (absorbent, booms, etc.). All drivers will receive training to maintain familiarity with state/federal regulations regarding used oil transportation (Chapter 62-710.600 & 40 CFR Part 279.43). If a spill occurs during transportation, personnel will take immediate action as described within the In-Transit ER Procedures Plan and as required under 40 CFR Part 279.43 (2 through 5).

The loading and unloading areas are located on the east and west sides of the Tank MTFSA for liquid wastes that arrive in tanker truck or vacuum truck. Three loading and unloading areas are located on the east side of the tank farm. One loading and unloading area is located on the west side of the Tank Farm. The east loading and unloading area containment pad drains to a sump located along the Tank Farm containment wall at the midpoint. The west loading/unloading area has a sumped containment trench that runs along the north, west, and south perimeter of the sumped containment pad, with containment on its east side provided by the MTFSA containment dike wall. The loading and unloading area for the warehouse is where containers of waste (used oil filters, non-hazardous solid wastes) are accepted at the facility. These transfers occur at the entrance of the drum storage area bay door. Bulk used oil filter unloading will occur inside the warehouse directly to the "filter pit".

STORAGE TANKS

All tanks and/or containers implemented for used oil storage within the facility meet the requirements of 40 CFR Parts 264 and 265 as applicable. All secondary containment meets the requirements of 40 CFR Part 279.45. All tanks and/or containers utilized for used oil storage,

petroleum contact water, industrial wastewater storage, marine diesel oil, and virgin diesel fuel will be clearly labeled accordingly. Facility personnel will address any spill, leak or other discharge as described within the current SPCC Plan.

FACILITY STANDARDS

Safety-Kleen will maintain an internal communications system consisting of telephones, cellular phones, audible alarms and electrical alarms. Fire extinguishers (portable type) are located within the control booth and at each exit/entrance and every 50 linear feet. All facility equipment is tested and/or inspected regularly. Copies of inspection/testing documentation are provided in the SPCC Plan. Housekeeping is implemented as required to ensure adequate aisle space for the unobstructed movement of spill personnel and equipment. All local authorities have received a copy of the facility's SPCC Plan and Contingency Plan.

SOLID WASTE GENERATED ONSITE

A written waste determination (profile) with supporting analytical information will be completed on solid waste generated onsite each year at the SWMA solidification area (pit). Solid waste streams generated on-site are as follows:

- Tank/railcar sludges
- Shaker/absorbent materials
- Used oil filter media from crusher operations (paper/plastics, etc.)
- Materials cleaned out of the used oil processing dehydrators.

The expected maximum on-site storage of these materials at any one time is two (2) 20-cubic-yard roll-off boxes. Once the roll-off boxes are full they are covered and stored at the SWMA. The maximum time of on-site storage would be no longer than four (4) weeks although it is anticipated that they would be removed sooner than this.

SOLID WASTE GENERATED OFFSITE

The Solid Waste Management Area (SWMA) includes the area inside the south end of the

warehouse and the solidification area. Containerized solid waste is stored in south part of the warehouse (drum storage area). Solid waste is processed by solidification in the SWMA located at the northwest corner of the facility. The SWMA is constructed of sealed concrete with a sumped work area and a roof. A roll-off box is staged at the work area for storing processed solid waste prior to disposal.

Safety-Kleen will accept and manage the following non-hazardous waste streams generated offsite:

- petroleum contaminated soil,
- petroleum contaminated sorbent materials,
- personal protective equipment,
- petroleum contaminated debris associated with a spill such as gravel, rock, concrete, asphalt and de minimus quantities of other petroleum contaminated solid wastes,
- petroleum tank bottom sludges from petroleum storage tank systems regulated pursuant to Chapter 62-761, F.A.C.,
- non-regulated petroleum storage tank systems, pits, containment areas, sumps and tanks, petroleum contaminated water (PCW) as defined in Rule 62-740.030(1), F.A.C.,
- petroleum contaminated sediments, sludges and liquids that originate from oil/water separators at residential car washes, rollover car washes, and tunnel car washes as defined in Rule 62-660.803(3), F.A.C., and
- empty petroleum contaminated drums, pails, gas tanks, and fuel filters not otherwise constituting used oil.

USED OIL PROCESSING

The initial step in the processing of used oil is to bring the hot gas generator up to operating temperature. The hot gas is used to operate the dehydrators and the processing unit. The used oil is initially pumped into the bottom tank which is a heat exchanger used to preheat the used oil and recover energy. The preheated used oil is stored in the day tank. The used oil is transferred to the dehydrator for the removal of water. The dehydrated used oil is stored in the

dehydrated used oil tank. The dehydrated used oil is then transferred into the processing unit where the used oil is refined into smaller length hydrocarbon molecules. The marine diesel fuel is condensed using a selective fractional condensing unit. The light ends are condensed in the bottom tank and are transferred to the used oil light ends tank. The lights ends can be used for fuel to feed the hot gas generator. The marine diesel fuel is collected in two tanks. The marine diesel fuel is then pumped to the storage tanks in the tank farm. The processor can also be operated to produce dehydrated used oil that is not cracked. A secondary thermal oxidizing unit is provided to treat off-gases in the event of a flame-out condition in the hot gas generator.

Attachment D

Analysis Plan

ANALYSIS PLAN-USED OIL INCOMING AND OUTGOING SHIPMENTS

PURPOSE | SCOPE

This analysis plan is designed to satisfy the requirements of 40 CFR 279.53 and 279.72 as specified in 40 CFR 279.55. This procedure outlines the decision-making processes used in determining the disposition of any individual load of used oil analyzed in anticipation for acceptance into the Safety-Kleen Systems, Inc. (S-K) system, for resale or processing prior to resale. This plan is augmented by Attachment D-1 which illustrates the collection, acceptance, and marketing procedures.

SAMPLING PLAN

The S-K sampling method complies with ASTM D-4057 and the requirements of 40 CFR 261 Appendix 1. Sampling is conducted in the container specific procedures described therein and incorporated in subsequent test methods. Sampling equipment and methods vary between individual locations. S-K uses sample cocks, tank taps, coliwasa, and extended-tube sampling that comply with the approved methods for sampling petroleum products. Random sampling per ASTM D-4057 and SW-846 is used for determination of frequency for sample lots. Sample containers used to contain sample media are either glass or plastic bottles as outlined in the above-referenced standards.

SAMPLING INTERVALS AND FREQUENCY

A retain sample is taken from each container at each new and existing customer location before pumping a load of used oil. The S-K representative will use the TIF Halogen detector to screen the sample for halogenated constituents. If the TIF indicates the presence of halogenated materials by alarming, the S-K representative will verify, with the assistance of the S-K facility manager and/or Environmental Compliance Manager, if the customer is a Public Collection Center (DIY collection center) or a Very Small Quantity Generator (VSQG) of hazardous waste. If this information is verified, the S-K representative will document the load failed and proceed to collect the used oil. If the customer is found to be a Small Quantity Generator (SQG) or Large Quantity Generator (LQG) of hazardous waste the S-K

representative will perform Dexil® Clor-D-Test analysis on the retain sample. If this analysis finds the oil to be >1,000 ppm halogens the S-K representative will inform the customer and will not collect the used oil. A representative sample of the used oil would then need to be sent to a laboratory for rebuttable presumption analysis in this case.

S-K has three used oil collection procedures depending on the type of customer generating the used oil. They are defined as follows:

Automotive Categories – Body shops, auto maintenance, fleet, dealership, dealership – heavy equipment – RV, fleet – utility, quick lube, auto retail, other – auto, government, K-12 & vocational, military. Used oil generated at the above facilities is collected after the material passes field testing procedures including the TIF Halogen Detector and if necessary Dexsil® Clor-D-Test analysis.

Non-Automotive Categories – Metal fabrication, printing & packaging, chemical manufacturing, other – industrial, metal working, natural resources, dry cleaning, other – specialty, higher education & medical, and construction. Used oil generated at the above facilities are required to have a representative sample of their used oil sent to the S-K Tech Center for analysis (Pre-qualification) and approval for Safety-Kleen Oil Services (SKOS) before pick-up. There the oil is analyzed for:

- Density,
- Flammability,
- Non- Volatile Residue,
- pH,
- Viscosity,
- Water Content,
- Phase (%Organic, %Aqueous, %Solid, %Sludge),
- Caustic Coagulation,
- Metals,

- Ash Content,
- Heat Content (BTU Value),
- VOC,
- HVOC,
- PCB.

If the used oil is approved for SKOS then prior to each pick up at the particular customer location the load is field tested with the TIF Halogen Detector and if necessary, the Dexsil® Clor-D-Tect kit.

High Risk Sources – Electrical service, repair, and utility facilities, non-automotive used oil stored in drums, scrap yards/junk yards, sewage treatment plants, third party oil collectors, dismantling of an old plant, source or generator is unknown, generators with used oil/antifreeze that contain detectable levels of PCBs (2 ppm or greater), generators that have previously been identified as being high risk waste generators.

Use oil generated at the above facilities are required to have a representative sample of their material sent to the S-K Tech Center and analyzed for the same constituents as nonautomotive categories before pick up. After that a representative sample is required to be taken and sent for PCB and Silicon analysis prior to each collection. In addition, field testing is performed with the TIF Halogen Detector and if necessary Dexsil® Clor-D-Tect Kit.

If the customer sample passes field screening methods, the S-K representative will mark the field screening sections appropriately on the shipping paper and collect the used oil load. It is always the discretion of the S-K oil collection representative to require a sample of the customer's used oil be taken and analyzed prior to collection if he/she suspects contamination or encounters a suspicious odor. If the S-K representative decides to utilize the laboratory testing procedure, the customer's used oil may not be collected until the laboratory results have been received. For current or prior customers from whom S-K has not collected used oil during a 12-month period or where the used oil generation process

has changed, S-K will re-certify them under this process before a subsequent used oil collection is performed. Any customer determined to have caused a contamination event (high halogen load, PCB load, etc.) will be treated as a high-risk customer should collections resume. Each time a used oil collection driver picks up used oil from a customer, field testing via the use a TIF Halogen detector (sniffer) as a screening device to detect the presence of contaminants is performed prior to collection.

If the detector alarm sounds, possibly indicating that a hazardous waste has been mixed into the used oil, the driver will not load the material unless a determination has been made with the assistance of the S-K Facility Manager and/or Environmental Compliance Manager that the customer is a VSQG or Public Collection Center. For SQGs & LQGs, if the TIF Halogen Detector indicates the presence of halogenated constituents, then it is required to be confirmed with the Dexsil® Clor-D-Tect Kit.

All used oil loads received at the facility are required to have a representative retain sample taken from the vessel holding the material and analyzed with the Dexsil® Clor-D-Tect Kit before off- loading into holding tanks. These retain samples are held at the SK facility until the outbound sample clears laboratory testing. If the facility utilizes transfer tanks, then each is sampled and retained at the facility until the outbound tank clears. Contents of the transfer tanks may be transferred to and commingled with the contents of other transfer tanks into outbound tanks.

In some cases, S-K leases railcars for transportation purposes. Once the railcar is loaded, the facility pulls a sample or composite retain sample (i.e. the railcar is equivalent to an outbound tank). The outbound sample is taken from each batch (outbound tank/tanker or railcar) and analyzed to ensure that the used oil can be marketed as on-specification used oil fuel in accordance with 40 CFR 279.11 and 279.72, and also to provide the purchasing customer with the physical properties of the fluid.

RECORDS RETENTION

S-K retains records and results of the used oil analysis and hazardous waste determinations

(if applicable) described in the written analysis plan for a minimum of three years.

METHODS OF ANALYSIS

S-K uses their laboratory for most used oil analysis as described in this plan. However, on some occasions an outside laboratory may be used for rebuttable presumption studies and/or for verification of results through quality control studies. The methods used by the S-K Laboratory to determine the properties of the fluids at the various points in the process are as follows by type of sample:

Certification Samples:

IgnitabilityEPA SW846-10 10
Water.....ASTM D-1744
Arsenic..... EPA SW846-6010
Cadmium EPA SW846-60 10
Chromium EPA SW846-6010
Lead..... EPA SW846-60 10
Total Chlorine (Halogens) EPA SW846-9075
SulfurEPA SW846-9075
PCBEPA SW846-8082

Check

IgnitabilityEPA SW846-1010
Total Chlorine (Halogens) EPA SW846-9075

Outbound Samples:

Ignitability EPA SW846-1010
Water.....ASTM D-1744
Arsenic..... EPA SW846-6010
CadmiumEPA SW846-6010
Chromium EPA SW846-6010
Lead..... EPA SW846-60 10
Total Chlorine (Halogens) EPA SW846-9075
SulfurEPA SW846-9075
PCB EPA SW846-8082
Total AshASTMD-482

Viscosity.....ASTM D-445
API GravityASTM D-1298 or D-4052
Water by BS&WASTM D-1796
Sediment by BS&WASTM D-1796

When samples are sent to outside laboratories for analysis of halogenated hazardous constituents for Rebuttable Presumption purpose, laboratory methods are as follows:

Volatile Organic CompoundsEPA SW846-8260B By
GC/MS Semi Volatile Organic Compounds ... EPA SW 846-
8270C By GC/MS

REBUTTABLE PRESUMPTION

To satisfy the Rebuttable Presumption requirements of 40 CFR 279.53, if a tank, tanker truck, or container of used oil is sampled, analyzed, and found to exceed 1,000 ppm total Halogens, the following procedures are used:

In the event that sufficient knowledge of the source of the used oil is available to ascertain that the total halogen content is below 1,000 ppm, then S-K documents this knowledge and keeps the documentation on file at the facility and uses it as the basis to rebut the presumption that the used oil contains significant concentrations of halogenated hazardous constituents. Applying knowledge of the halogen content of the used oil in light of the materials or processes used may be made by customer certifications, periodic recertifications, site visits, and/or customer analysis of samples.

Used oil received from a public collection program that does not receive waste from businesses can have the waste determination documented by a statement from the generator. Waste determinations from businesses require that generators use "product" or "process" knowledge with appropriate documentation. "Process knowledge" could constitute acceptable knowledge when detailed information on the wastes is obtained from existing published or documented waste analysis data or studies conducted on waste

streams generated by processes similar to that which generated the waste. Acceptable knowledge of a waste stream is relied upon when:

- S-K is familiar with the generator processes by site visits, sampling data and other information if needed.
- Waste analysis data contained in documented studies from the generator must be based on valid sampling and analytical techniques as documented in the attached S-K Waste Material Profile Form.
- Process description and documented studies from the generator are reviewed to determine if any differences exist between the processes described in the studies and those employed by the generator.

If sufficient generator knowledge is not available to rebut the presumption, then laboratory analyses is performed and documented to determine if significant concentrations of halogenated hazardous constituents are present in the used oil. These analyses are EPA SW846-8260B Volatile Organic Compounds by GC/MS, and EPA SW846-8270C Semi-volatile Organic Compounds by GC/MS. Acceptance of used oil containing greater than 1,000 ppm of a halogenated hazardous constituent listed in Appendix VIII is determined by S-K on a case-by-case basis; but in no case will used oil be accepted with analytical results showing halogenated hazardous constituents listed in Appendix VIII of Part 261 constituent present at a concentration of 1,000 ppm or greater (Ref. 50 FR 49176-49177 regarding use of the rebuttable presumption and the evaluation of "significant levels" of halogenated hazardous constituents). If found to be rebuttable, S-K directs the used oil into the on-specification fuel oil or used oil processing streams only if total Halogens are below 4,000 ppm. However, if the used oil is determined to contain significant concentrations of halogenated hazardous constituents, S-K handles it as hazardous waste in accordance with 40 CFR Part 262. In all cases in which the presumption is to be rebutted, a S-K senior official or a designated representative approves all final determinations.

DETERMINATION OF USED OIL SPECIFICATIONS

If the used oil is analyzed and found to be outside the specification tolerances for parameters

other than Halogens, as listed in 40 CFR 279.11, the used oil is handled in accordance with applicable regulations. In the case of detectable PCB concentrations, as listed in 40 CFR 761.20(e), the provisions of 40 CFR 761.1(b)(5) and 40 CFR parts 261 and 279 are complied with. On all occasions when a load of used oil exceeds on-specification requirements in accordance with 40 CFR 279.11, a review of all contributors to that load is conducted to determine the source of the nonconforming load.

S-K Used Oil Classification

Safety-Kleen classifies the used oil it picks up and accepts into three categories:

Automotive – Used oil is considered automotive if it is derived from the maintenance of internal combustion engines and from one of the following generators; body shop, auto maintenance, fleet, dealership, dealership (heavy equipment, RV), fleet (utility), quick lube, auto retail, other (auto), government, K-12 & vocational, and military. Used oil collected and accepted from this category is field tested with the TIF Halogen Detector before pick up at every stop. If the material fails the halogen screening a Dexsil® Clor-D-Tect analysis is performed on the material. If the material fails the Clor-D-Tect analysis then it will not be accepted if the generator is a small quantity generator (SQG) or large quantity generator (LQG) of hazardous waste until rebuttal analysis is completed and can be reviewed.

Non-Automotive – Used oil is considered non-automotive if it comes from one of the following generators; metal fabrication, printing & packaging, chemical manufacturing, other (industrial), metal working, natural resources, dry cleaning, other (specialty), higher education & medical, and construction. Used oil collected and accepted from this category is required to be sampled and undergo pre-qualification analysis before the initial collection. Once the used oil has been analyzed and is deemed to be acceptable it may be picked up and the procedures regarding field testing (halogen screening, Clor-D-Tect, etc.) are the same as for an automotive generator.

High Risk Sources – Use oil is considered high risk if it is generated from, but not limited to the following sources; electrical service, repair, and utility facilities, all non-automotive used

oil stored in drums, generators that have previously been identified as being high risk, generators with used oil that contain detectable levels of PCBs (2 ppm or greater), generators whose used oil has failed the Dexsil Clor-D-Tect test, Do-It-Yourself” (DIY) storage tank/container sites that have no controlled access, scrap yards/junk yards, sewage treatment plants, third party used oil collectors, dismantling of old plant, source of generator is unknown, used oil that exhibits unusual characteristics. Used oil collected and accepted from this category is required to be sampled and undergo pre-qualification analysis before the initial collection. Thereafter, PCB and Silicon analyses must be performed on subsequent pick-ups before collection. Once the used oil has been analyzed and is deemed to be acceptable it may be picked up and the procedures regarding field testing (halogen screening, Clor-D- tect, etc.) are the same as above.

Use oil retain samples are collected at each generator location at the time of service for all categories of generators. In addition, the S-K Ocala facility takes a representative sample of all incoming used oil shipments and analyzes the material for chlorine, halogens, and sulfur using an XRF instrument, and or Dexsil Clor-D- Tect kit before releasing the load for processing into the plant. In the event that any load fails the truck or tank will be locked down and a representative sample of the load will be sent to a laboratory for rebuttal analysis. In addition, the retain samples associated with the specific load will be sent to an internal laboratory to determine the source of contamination. Upon analytical results, any load of used oil that is considered to be a hazardous waste will be properly managed as such. Any customer/generator of used oil that is determined by Safety-Kleen to have been the cause of a contaminated load of used oil (high halogen, PCB, etc.) will be treated as a high risk customer for future used oil collection and will have to follow the procedures for high risk customers for future service.

ANALYSIS PLAN REVIEW

The plan is reviewed periodically or whenever necessary to reflect new or modified tasks, procedures, and processes, which affect the items in this analysis plan.

Chart 1

Collection Requirement – Automotive Category

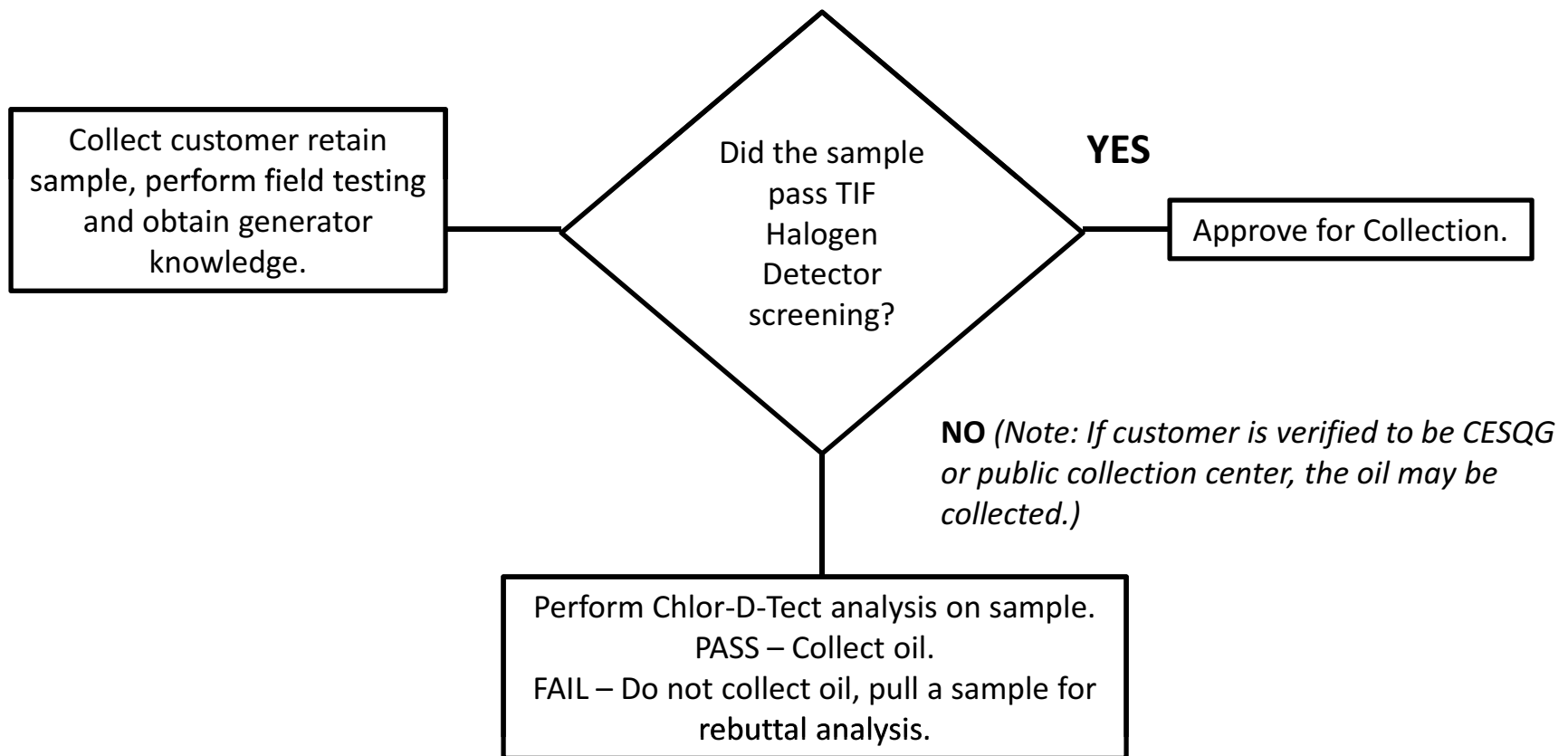


Chart 2

Collection Requirement – Non-Automotive Category

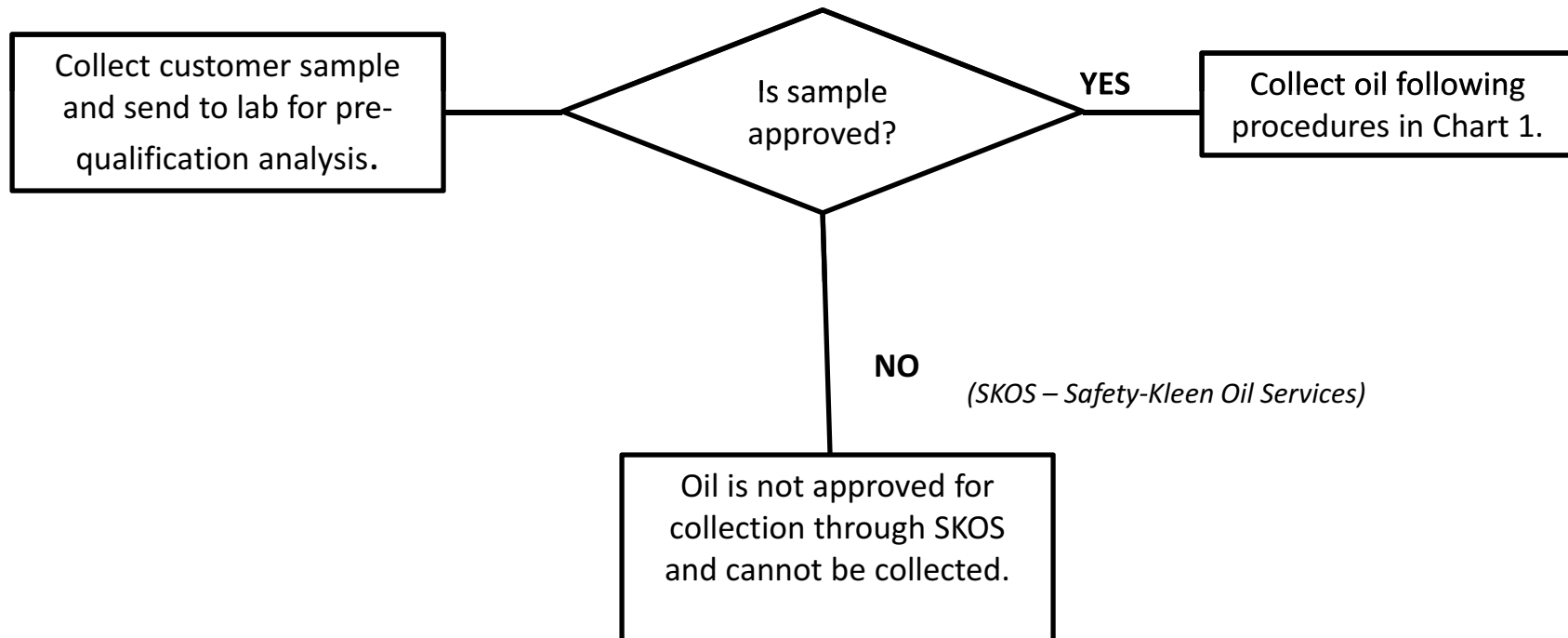


Chart 3

Collection Requirement – High Risk Sources

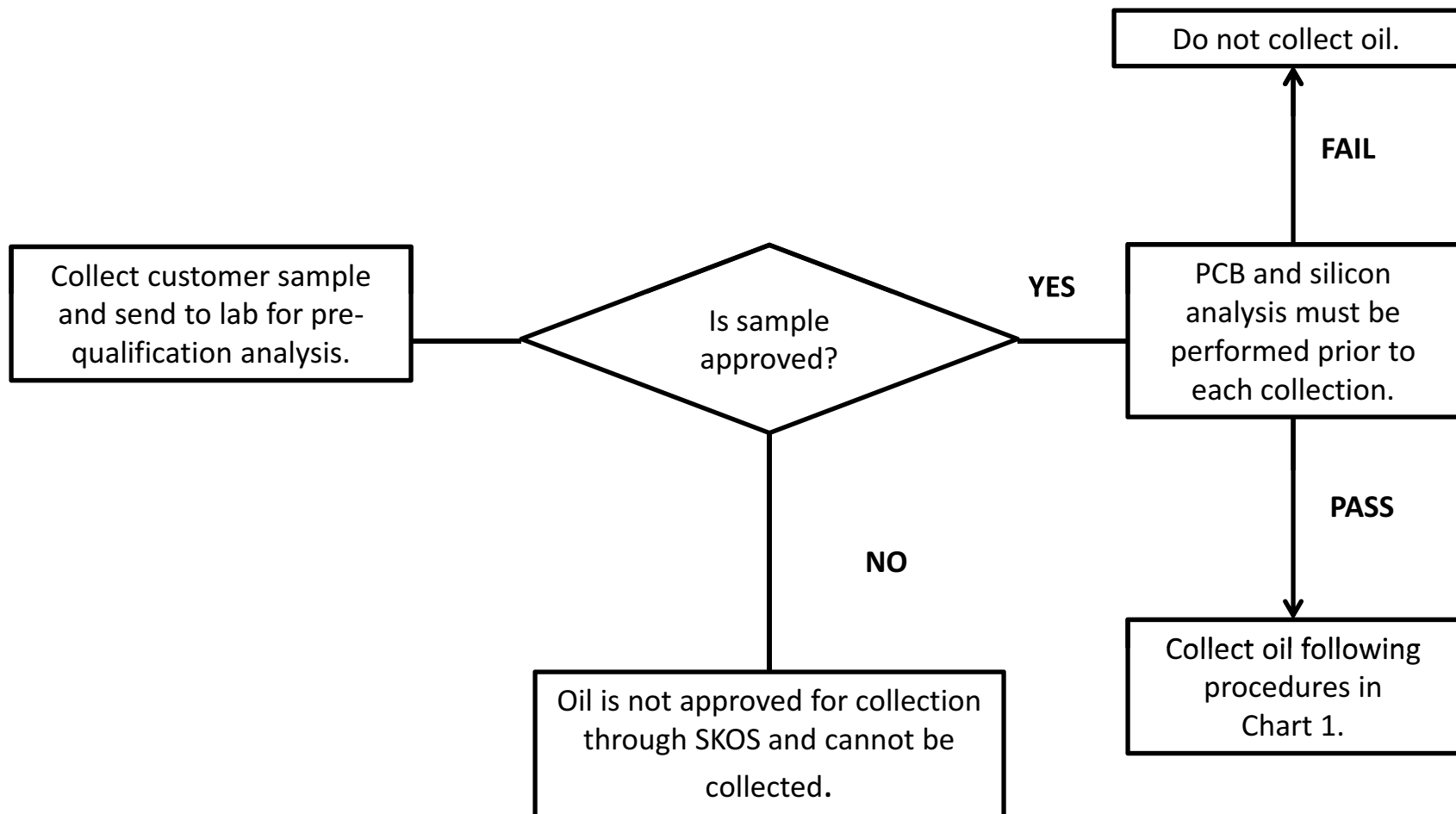


Chart 4

Ocala Used Oil Load Acceptance Procedure

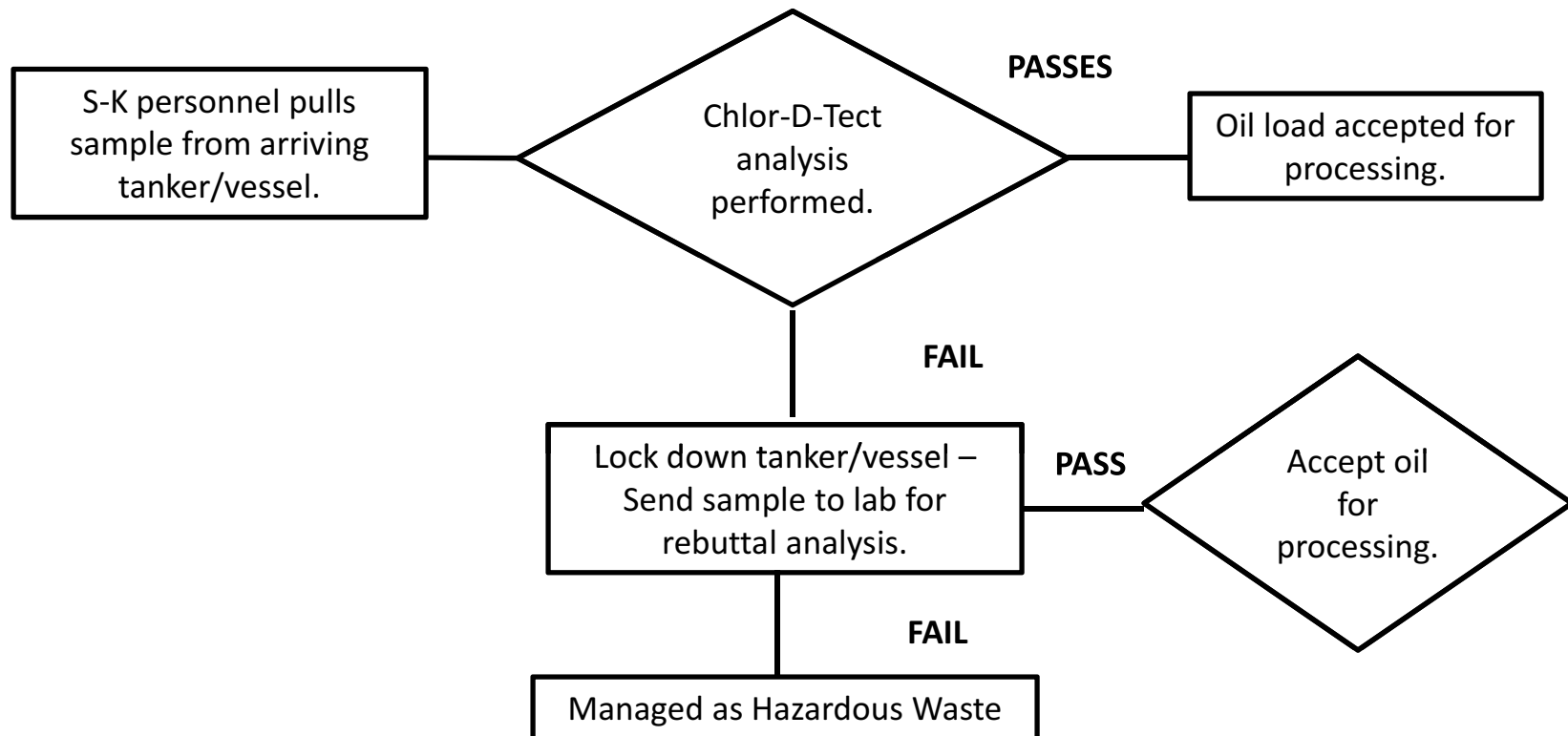
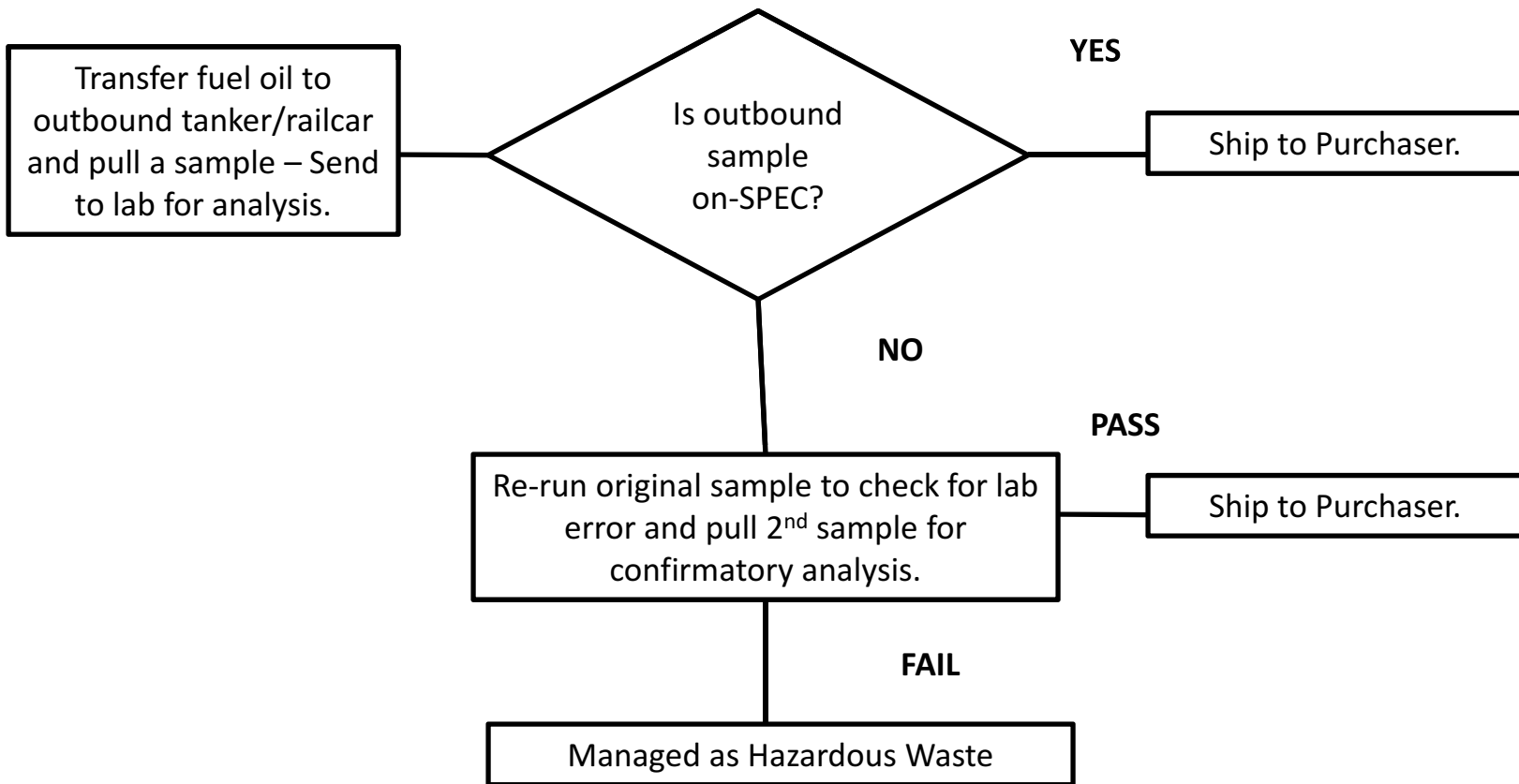


Chart 5

Used Oil Marketing Procedure



Attachment E

Sludge, Residue, And Byproduct Management Description

Sludge, Residue and By-Product Management

Waste sludge is removed from individual tanks approximately once every five years. Waste sludge generated from S-K process tanks will undergo testing for hazardous waste determination before disposal. A representative sample is taken from the solid waste management area (SWMA) mix pit annually and sent to a 3rd party laboratory for the analyses listed in the following table:

<u><i>Parameter</i></u>	<u><i>Method No.</i></u>	<u><i>Allowable Limit</i></u>
TCLP Arsenic	1311/7060/6010	5.0 mg/l
TCLP Barium	1311/7080/6010	100.0 mg/l
TCLP Cadmium	1311/7131/6010	1.0 mg/l
TCLP Chromium	1311/7191/6010	5.0 mg/l
TCLP Lead	1311/7421/6010	5.0 mg/l
TCLP Mercury	1311/7471	0.2 mg/l
TCLP Selenium	1311/7740/6010	1.0 mg/l
TCLP Silver	1311/7761/6010	5.0 mg/l
TCLP Volatiles	1311/624/8260	Refer to 40 CFR 261.24
TCLP Semivolatiles	1311/625/8270	Refer to 40 CFR 261.24
TCLP Pesticides	1311/608/8081	Refer to 40 CFR 261.24
TCLP Herbicides	1311/615/8321	Refer to 40 CFR 261.24
Flash Point	1010	>140° F

All materials determined to be a hazardous waste are transported by a licensed hazardous waste transporter to an approved RCRA designated facility permitted to receive the material. If the facility determines that it has generated hazardous waste, that material will be stored in the secondary containment area of the warehouse (drum storage area). Hazardous waste containers, if generated, will be inspected weekly and inspection documentation will be kept on hand at the facility for review. All analyses will be requested via a laboratory Chain of Custody (COC) Document. Each sample submitted for analysis will be recorded in SK's internal database and hard copies will be provided to the generator. Only personnel who have the required training will perform confined space entry to complete the sludge and residues removal work in the facility tanks.

Attachment F

Used Oil Tracking Plan

USED OIL TRACKING PLAN

This management procedure covers the tracking requirements of Title 40 Code of Federal Regulations (CFR) Parts 279.56. Safety-Kleen Systems, Inc. (S-K) will conduct business in accordance with this tracking plan when shipping or receiving used oil. Copies of the various forms used by S-K related to the implementation of this plan are also enclosed.

DESCRIPTION

The S-K used oil shipping documents are to be retained for at least three years. These documents include the information as stated in 40 CFR Part 279.56 (See used oil shipment documents provided in Attachment F-1). These documents contain the required regulatory information in accordance with 40 CFR Part 279.56 as follows:

- Name and address of transporter who delivered the used oil to the processor/re-refiner;
- The name and address of the generator or processor/re-refiner from whom the used oil was sent for processing/re-refining;
- The EPA identification number of the transporter who delivered the used oil to the processor/re-refiner;
- The EPA identification number (if applicable) of the generator or processor/re-refiner from whom the used oil was sent for processing/re-refining;
- The quantity of used oil accepted; and
- The date of acceptance.

The tank that each tanker load is placed into is recorded on the S-K Incoming Used Oil Shipment Log. Loads that are to be rejected will be done so prior to off-loading the used oil. The S-K used oil processing facility will keep a record of each incoming used oil shipment accepted for processing (A copy of the used oil shipping document form is provided). The main record form will be the S-K Facility Operating Log. This log contains the following information:

- Date used oil load received;
- Container number;
- Generator name and EPA ID number (if applicable);
- Inbound manifest number;

- Date shipped;
- Outbound manifest;
- Outbound location;
- Quantity of used oil accepted; and
- Container type

The S-K used oil processing facility maintains a record of each outgoing used oil shipment that is sent to a used oil burner, processor/re-refiner or disposal facility. The record will be the S-K Outgoing Used Oil Shipment document. The processed fuel will be placed into a tank until it is at permitted capacity, or the production run is finished. Upon sampling the contents of the tank, no further used oil will be added to the tank. The processed fuel tank will be sampled and analyzed in accordance with the waste analysis plan. The analytical results are kept on hand at the facility and also provided to the customer. A copy of a typical shipping document is provided in Attachment F-1. This document contains the following information:

- Name and address of the transporter who delivered the used oil to the burner, processor/re-refiner or disposal facility;
- Name and address of the burner, processor/re-refiner or disposal facility receiving the oil;
- The EPA identification number of the transporter who delivers the used oil to the burner, processor/re-refiner or disposal facility;
- The EPA identification number of the burner, processor/re-refiner, or disposal facility who will receive the used oil;
- The quantity of used oil shipped; and
- The date of the shipment

SK Ocala operates under EPA ID number FLR000060301. All shipments will be tracked via a uniform manifesting system. At a minimum, the information contained within the tracking system will include the following:

- Acceptance Documentation
- Profile Documentation
- Generator Information as Required Under 40 CFR Part 279.46
- Transporter Information as Required Under 40 CFR Part 279.46

- Facility Information as Required Under 40 CFR Part 279.46

All manifesting system documents will be maintained for at least three (3) years.

OPERATING REPORTS

S-K will complete and forward an Annual Report by Used Oil and Used Oil Filter Handlers on DEP Form 62-710.901(3) as required by Chapter 62-710.510(5), F.A.C. no later than March 1 of each year.

Attachment F-1

Used Oil Tracking Plan Documents / Forms

BILL OF LADING/MANIFEST		1. Shipper's US EPA ID No. (If Applicable)		Document No.	2. Page 1 of	
3. Shipper's Name and Mailing Address						
4. Shipper's Phone ()						
5. Transporter 1 Company Name			6. US EPA ID Number	A. Transporter's Phone		
7. Transporter 2 Company Name			8. US EPA ID Number	B. Transporter's Phone		
9. Designated Facility Name and Site Address			10. US EPA ID Number	C. Facility's Phone		
11. Shipping Name and Description				12. Containers		13. Total
				No.	Type	Quantity
15. Special Handling Instruction and Additional Information						
16a. US DOT HAZARDOUS MATERIALS SHIPPER'S CERTIFICATION: <small>*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.</small>						
Printed/Typed Name			Signature required here if US DOT regulated		Month	Day
16b. NON-REGULATED SHIPPER'S CERTIFICATION: I certify the materials described above on this form are not subject to federal regulations for Transportation or Disposal.						
Printed/Typed Name			Sign here if material is not DOT regulated		Month	Day
17. Transporter 1 Acknowledgement of Receipt of Materials						
Printed/Typed Name			Signature		Month	Day
18. Transporter 2 Acknowledgement of Receipt of Materials						
Printed/Typed Name			Signature		Month	Day
19. Discrepancy Indication Space						
20. Facility Owner or Operator: Certification of receipt of materials covered by this form except as noted in Item 19.						
Printed/Typed Name			Signature		Month	Day

NON-HAZARDOUS WASTE MANIFEST

TLT 107952

Please print or type (Form designed for use on elite (12 pitch) typewriter)

NON-HAZARDOUS WASTE MANIFEST		1. Generator's US EPA ID No.		Manifest Document No. #4		2. Page 1 of	
3. Generator's Name and Mailing Address							
4. Generator's Phone ()							
5. Transporter 1 Company Name		6. US EPA ID Number		A. State Transporter's ID			
7. Transporter 2 Company Name		8. US EPA ID Number		B. Transporter 1 Phone			
9. Designated Facility Name and Site Address		10. US EPA ID Number		C. State Transporter's ID			
				D. Transporter 2 Phone			
				E. State Facility's ID			
				F. Facility's Phone			
11. WASTE DESCRIPTION				Containers		13. Total Quantity	
				No. Type		14. Unit Wt./Vol.	
a.							
b.							
c.							
d.							
G. Additional Descriptions for Materials Listed Above				H. Handling Codes for Wastes Listed Above			
15. Special Handling Instructions and Additional Information							
<p>16. GENERATOR'S CERTIFICATION: I hereby certify that the contents of this shipment are fully and accurately described and are in all respects in proper condition for transport. The materials described on this manifest are not subject to federal hazardous waste regulations.</p>							
Printed/Typed Name				Signature		Date	
						Month Day Year	
17. Transporter 1 Acknowledgement of Receipt of Materials						Date	
Printed/Typed Name				Signature		Month Day Year	
18. Transporter 2 Acknowledgement of Receipt of Materials						Date	
Printed/Typed Name				Signature		Month Day Year	
19. Discrepancy Indication Space							
20. Facility Owner or Operator: Certification of receipt of the waste materials covered by this manifest, except as noted in Item 19.							
Printed/Typed Name				Signature		Date	
						Month Day Year	

NON-HAZARDOUS WASTE

GENERATOR

TRANSPORTER

FACILITY



1071204

WORK ORDER NO. _____

DOCUMENT NO.

STRAIGHT BILL OF LADING

TRANSPORTER 1 _____ VEHICLE ID # _____

EPA ID # _____ TRANS. 1 PHONE _____

TRANSPORTER 2 _____ VEHICLE ID # _____

EPA ID # _____ TRANS. 2 PHONE _____

DESIGNATED FACILITY				SHIPPER	
FACILITY EPA ID #				SHIPPER EPA ID #	
ADDRESS				ADDRESS	
CITY		STATE	ZIP	CITY STATE ZIP	
CONTAINERS NO. & SIZE	TYPE	HM	DESCRIPTION OF MATERIALS	TOTAL QUANTITY	UNIT WT/VOL
			A.		
			B.		
			C.		
			D.		
			E.		
			F.		
			G.		
			H.		
SPECIAL HANDLING INSTRUCTIONS					

SHIPPERS CERTIFICATION: 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.

SHIPPER	PRINT	SIGN	DATE
TRANSPORTER 1	PRINT	SIGN	DATE
TRANSPORTER 2	PRINT	SIGN	DATE
RECEIVED BY	PRINT	SIGN	DATE

Attachment G

Preparedness and Prevention Plan (SPCC)

SPILL PREVENTION, CONTROL, AND COUNTERMEASURE PLAN

For:

**Safety-Kleen Systems, Inc.
359 Cypress Road
Ocala, Marion County, Florida 34472**

EPA Generator I.D. No. FLR 000 060 301



Prepared / Updated by:

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And

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State of Florida Engineering Business
Certificate Number 30955

Revised:

December 2021

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1. CERTIFICATIONS AND MANAGEMENT APPROVAL

1.1 PROFESSIONAL ENGINEER'S CERTIFICATION [112.3(D)]

I hereby certify that I am familiar with the requirements of Chapter 40, Part 112, Code of Federal Regulations (CFR), and that I, or any agent working under my direction, have visited the Safety-Kleen System, Inc. (S-K), facility, located at 359 Cypress Road in Ocala, Florida. I also certify that this Spill Prevention, Control, and Countermeasure (SPCC) Plan has been prepared in accordance with good engineering practices, including consideration of applicable industry standards, and with the requirements of 40 CFR Part 112. Furthermore, I certify that procedures for required inspections and testing have been established and that this SPCC Plan is adequate for the facility.

Such certification shall in no way relieve the S-K facility of the duty to prepare and fully implement this SPCC Plan in accordance with the requirements of 40 CFR Part 112.

By/Date: _____

Francisco J. "Paco" Amram, P.E.
Florida P.E. License No. 45133
Landmark Solutions, LLC
State of Florida Engineering Business
Cert. of Auth. #30955

Table 1. SPCC Plan Certifications

No.	By	Date	Description
0	Mario E. Farrulla, P.E.	October 18, 2011	Original Plan
1	F.J. "Paco" Amram, P.E.	February 6, 2017	5-year review and update

1.2 DOCUMENTATION OF PLAN REVIEW AND EVALUATION [112.5]

Appendix A contains tables suitable for tracking periodic review and evaluation of this SPCC Plan.

1.3 MANAGEMENT APPROVAL [112.7]

S-K is committed to the prevention of discharges of oil to navigable waters and the environment from their facility located at 359 Cypress Road in Ocala, Marion County, Florida. As a part of this commitment, S-K will provide the necessary resources to fully implement this SPCC Plan. S-K will maintain the highest standards for discharge prevention, control, and countermeasures through regular review, updating, and implementation of this Plan.

By: _____
Wanda Hutchinson
Terminal Manager
Ocala Facility

Safety-Kleen Systems, Inc.

Date: _____

1.4 CERTIFICATION OF THE APPLICABILITY OF THE SUBSTANTIAL HARM CRITERIA

To comply with requirement: Attachment C-II to Appendix C of 40 CFR Part 112.

1. Does the facility transfer oil over water to or from vessels and does the facility have a total oil storage capacity greater than or equal to 42,000-gallons?

☐ Yes ☒ No
2. Does the facility have a total oil storage capacity greater than or equal to 1 million gallons and does the facility lack secondary containment that is sufficiently large to contain the capacity of the largest aboveground oil storage tank plus sufficient freeboard to allow for precipitation within any aboveground oil storage tank area?

☐ Yes ☒ No
3. Does the facility have a total oil storage capacity greater than or equal to 1 million gallons and is the facility located at a distance (as calculated using the appropriate formula in Attachment C-III to Appendix C to 40 CFR Part 112 or a comparable formula¹) such that a discharge from the facility could cause injury to fish and wildlife and sensitive environments? For further description of fish and wildlife and sensitive environments, see Appendices I, II, and III to DOC/NOAA's "Guidance for Facility and Vessel Response Plans: Fish and Wildlife and Sensitive Environments" (see Appendix E to 40 CFR Part 112, Section 13, for availability and the applicable Area Contingency Plan.

☐ Yes ☒ No
4. Does the facility have a total oil storage capacity greater than or equal to 1 million gallons and is the facility located at a distance (as calculated using the appropriate formula in Attachment C-III to Appendix C to 40 CFR Part 112 or a comparable formula¹) such that a discharge from the facility would shut down a public drinking water intake?

☐ Yes ☒ No
5. Does the facility have a total oil storage capacity greater than or equal to 1 million gallons and has the facility experienced a reportable oil discharge in an amount greater than or equal to 10,000-gallons within the last 5 years?

☐ Yes ☒ No

I certify, under penalty of law, that I have personally examined and am familiar with the information submitted in this document, and that based on my inquiry of those individuals responsible for obtaining this information, I believe that the submitted information is true, accurate, and complete.

By: _____

Date: _____

Wanda Hutchinson

Terminal Manager

Ocala Facility, Safety-Kleen Systems, Inc

¹ If a comparable formula is used, documentation of the reliability and analytical soundness of the comparable formula must be attached to this form.

2. INTRODUCTION

Section 311(j)(1)(C) of the Clean Water Act required the development of regulations to establish procedures, methods, equipment, and other requirements to prevent discharges of oil from vessels and facilities, and to contain such discharges should they occur. These regulations were promulgated by the United States Environmental Protection Agency (EPA) and are found in 40 CFR Part 112, *Oil Pollution Prevention*. The preparation and implementation of a Spill Prevention, Control, and Countermeasure (SPCC) Plan (the Plan) is required, when applicable. 40 CFR 112.2 defines an SPCC Plan as:

“the document required by 112.3 that details the equipment, workforce, procedures, and steps to prevent, control, and provide adequate countermeasures to a discharge.”

S-K must prepare and implement an SPCC Plan because the facility meets the requirements listed in 40 CFR Part 112 (refer to Section 2.2.1).

2.1 PLAN REVIEW AND AMENDMENT [112.5]

2.1.1 PLAN AMENDMENTS AND P.E. CERTIFICATION OF AMENDMENTS [112.5(a),(c)]

This Plan must be amended when there is a change in the facility’s design, construction, operation, or maintenance that materially affects the facility’s potential for the discharge of oil into or upon the navigable waters of the United States or adjoining shorelines. The amendment must be completed within six months and implemented as soon as possible, but in no case later than six months following the preparation of the amendment.

An amendment to the Plan can either be technical in nature, which requires a Professional Engineer’s certification, or non-technical (administrative) in nature, which does not require Professional Engineer certification. Technical amendments materially affect a facility’s potential to discharge oil and require the application of good engineering practice. Hence, these types of changes require a Professional Engineer certification.

Records of both technical and non-technical amendments will be maintained in **Appendix A**. If it cannot be determined whether an amendment is technical or non-technical, the change will be reviewed by a Professional Engineer.

2.1.2 PERIODIC REVIEW AND EVALUATION [112.5(B)]

A review and evaluation of this Plan must be conducted at least once every five years from the original date of certification. The Plan must be amended within six months of the review to include more effective prevention and control technology, if the technology has been field-proven at the time of review and will significantly reduce the likelihood of a discharge of oil into or upon the navigable waters of the United States or adjoining shorelines. The amendment must

be implemented as soon as possible, but no later than six months following the preparation of the amendment.

Completion of the review and evaluation must be documented, and this documentation must include a signed statement indicating whether the Plan will be amended. **Tables A-1 and A-2** in **Appendix A** are provided to serve as the documentation for these periodic reviews.

2.2 GENERAL PLAN REQUIREMENTS [112.7]

2.2.1 SPCC PLAN PREPARATION

An SPCC Plan must be prepared for any facility subject to 40 CFR Part 112. S-K must prepare a SPCC Plan because it meets the following requirements:

- It is a non-transportation-related onshore facility engaged in storing and using oil and oil products, which due to its location, could reasonably be expected to discharge oil in quantities that may be harmful, as described in 40 CFR Part 110, into or upon the navigable waters of the United States or adjoining shorelines; and
- It has an aggregate aboveground storage capacity exceeding 1,320 gallons of oil, counting only containers of oil with a capacity of 55 gallons or greater.

2.2.2 MANAGEMENT APPROVAL

A SPCC Plan must have the full approval of management at a level of authority to commit the necessary resources to fully implement the Plan. A signed statement of approval for this Plan by S-K management is found in Section 1.3.

2.2.3 PLAN SEQUENCE

The sequence of an SPCC Plan must follow the sequence specified in 40 CFR 112.7. If this sequence is not followed, an equivalent Plan meeting all applicable requirements must be prepared, and a cross-reference must be provided. In general, this Plan follows the required sequence; however, there are some deviations. **Table 2-1** provides the locations of applicable requirements within this Plan.

Continued on next page.

Table 2. Locations of SPCC Plan Requirements within This Plan

40 CFR 112 Citation	Description	Plan Section
112.3(d)	Professional Engineer's Certification	1.1
112.4(a)	Written Notifications to EPA	4.3.2
112.4(c)	Written Notifications to States	4.3.2
112.5	Plan Review and Amendment	2.1
112.7	General Plan Requirements	2.2
112.7(a)(1)	Conformance with Plan Requirements	2.3
112.7(a)(2)	Deviations from Plan Requirements	2.4
112.7(a)(3)	Facility Layout	3.2
112.7(a)(3)(a)(i)	Facility Oil Storage	3.3
112.7(a)(3)(a)(ii)	Facility Discharge Prevention Measures	3.4
112.7(a)(3)(a)(iii)	Facility Discharge and Drainage Controls	3.5
112.7(a)(3)(a)(iv)	Facility Discharge Countermeasures	3.6
112.7(a)(3)(a)(v)	Disposal of Recovered Materials	4.4
112.7(a)(3)(a)(vi)	Emergency Contacts	4.1
112.7(a)(4)	Requirements for Oral Discharge Reporting	4.3.1
112.7(a)(5)	Discharge Response Procedures	4.2
112.7(b)	Potential Discharge Predictions	5.0
112.7(c)	Containment Systems and Diversionary Structures	6.1
112.7(d)	Contingency Planning	6.2
112.7(e)	Inspections, Tests, and Records	6.3
112.7(f)	Personnel and Training Procedures	6.4
112.7(g)	Security	6.5
112.7(h)	Facility Loading/Unloading Rack	6.6
112.7(i)	Brittle Fracture Evaluation	6.7
112.7(j)	State Requirements	6.8
112.8(a)	Conformance with Plan Requirements	2.3
112.8(b)	Facility Drainage	6.9
112.8(c)	Bulk Storage Containers	6.10
112.8(d)	Facility Transfer Operations	6.11
112.20	Facility Response Plans	4.5

2.2.4 FUTURE IMPLEMENTATION

If an SPCC Plan calls for procedures, methods, or equipment not yet fully operational or for additional facilities, these items must be discussed separately, and the discussion must explain the details of installation and operational startup.

Currently, S-K is in the process of constructing some changes to the facility. These changes do not materially affect the content or implementation of this Plan, other than the addition of supplies such as spill kits. The changes are summarized as follows:

1. Ten of the aboveground storage tanks (ASTs) in the Main Tank Farm – Tanks 1, 2, 7, 8, 9, 10, 13, 14, 15 and 16 – will contain new, re-refined, or blended oils, instead of used oil. This change in oil type does not affect the SPCC Plan.
2. New oil products will be packaged and warehoused in the Warehouse building. Since oils are already stored there, this change does not affect the SPCC Plan, other than accounting for any volume changes in the tank/volume table and total oil volume.
3. Four new transfer pumps are being installed along the outside of the west wall of the Main Tank Farm, to transfer oils between the ASTs and the tanker trucks or containers. These transfer pumps will be located within the Truck Loading-Unloading Area. They are thus within that Area's spill containment trench and pump sump, and their use also requires the preventative personnel oversight of all liquid transfers. Spill kit(s) will be provided as warranted.
4. A new Railcar Pump Station is being constructed to improve the pumping between facility tanks and railroad tank cars. The station is being equipped with appropriate controls and shut off valves. Any overflow from a release there would spill into the adjacent, existing, concrete containment structure for railcar spills, and that structure is already accounted for in the prior version of this Plan. Spill kit(s) will be added to this pump station area as warranted.
5. The large, field-erected Tank 53, with a capacity of 159,000 gallons, has and will remain out of service and may be removed from the facility altogether.
6. The other large, field-erected Tank 54, also with a capacity of 159,000 gallons, has been removed from the facility altogether. Tank 55, a 9,400-gallon storm water AST formerly in the Northern Tank Farm, has been removed from the facility.

2.3 CONFORMANCE WITH PLAN REQUIREMENTS [112.7(A)(1), 112.8(A)]

S-K conforms to all applicable requirements listed in 40 CFR Part 112, including those listed under Sections 112.7 and 112.8. This Plan and all actions taken in accordance with this Plan attest to S-K's conformance at this facility.

2.4 DEVIATIONS FROM PLAN REQUIREMENTS [112.7(A)(2)]

Certain deviations in the Plan requirements are allowed under 40 CFR 112.7(a)(2), if equivalent environmental protection is provided. S-K has the following exceptions that deviate from the applicable requirements:

1. None.

The previous Plan version cited the lack of a high-level alarm or direct-vision gauges on 55-gallon drums as a deviation from 40 CFR I 12.8(c)(8). However, those are only two of the options satisfying that rule. Others include *“(iii) Direct audible or code signal communication between the container gauger and the pumping station.”* Pursuant to that option, S-K personnel are instructed to monitor the level of oil which is visible through the opening in the top of the drums, and to shut off the flow accordingly. Thus, the applicable requirement is met.

3. FACILITY INFORMATION

3.1 LOCATION & MAIN CONTACTS

Facility Owner: Safety-Kleen Systems, Inc.
42 Longwater Drive
Norwell, MA 02061
Telephone: (781) 792-5000

Facility / Operator: **Safety-Kleen Systems, Inc.**
Facility Street Address: **359 Cypress Road**
Ocala, Marion County, Florida 34472

Facility Phone/Fax: **(352) 687-0688**
Fax: (352) 687-8511

Latitude: 29° 04' 55.28" North
Longitude: 81° 59' 27.19" West

Terminal Manager (on-site): Wanda Hutchinson
(352) 537-3071
Mobile: (352) 480-7828
Fax: (352) 687-8511
Home Cell: (352) 476-4125

Corporate Facility Owner Contact Jeffery Curtis
(off-site): Senior Environmental Compliance Manager
Mobile Phone: (561) 523-4719
Email: jeff.curtis@safety-kleen.com
359 Cypress Road
Mailing Address: Ocala, Florida 34472

Refer to Section 4.1.1 (Page 4-1) for facility emergency contacts.

3.2 FACILITY LAYOUT AND OPERATIONS [112.7(A)(3)]

The location of the S-K facility is shown on the U.S. Geological Survey (USGS) topographic quadrangle site location map presented as **Figure 1**. Land use in the vicinity of the S-K Facility is industrial. A residential development and an unnamed retention pond are located approximately 600 feet north of the railroad ROW and the S.E. Maricamp Road ROW that border the northern boundary of the site.

Figure 2, the site layout map, provides a more detailed view of the facilities, including locations of oil storage equipment (tanks), the tank numbers, the containment area designations, and the two retention ponds.

Figure 3 illustrates the inferred storm water (or spill) drainage flow pathways and directions. Storm water from the northeastern portion of the facility sheet flows across the paved areas and into the northern storm water dry retention pond. Storm water from the rest of the facility sheet flows through the pavement and into the southern storm water dry retention pond. Storm water collected in the dry retention ponds percolates into the ground, so there is no constructed discharge.

It was estimated that approximately 65-70% of the facility is paved. The remaining portion includes storm water retention ponds and grass-covered areas. Storm water that falls within the unpaved areas mainly percolates into the ground with runoff flowing to the two retention ponds.

The subject facility consists of a 12.3-acre parcel of land, with the site developed on a 5.88-acre plot of that land, roughly 500 feet (ft) east-to-west by roughly 600 ft north-to-south. The facility includes:

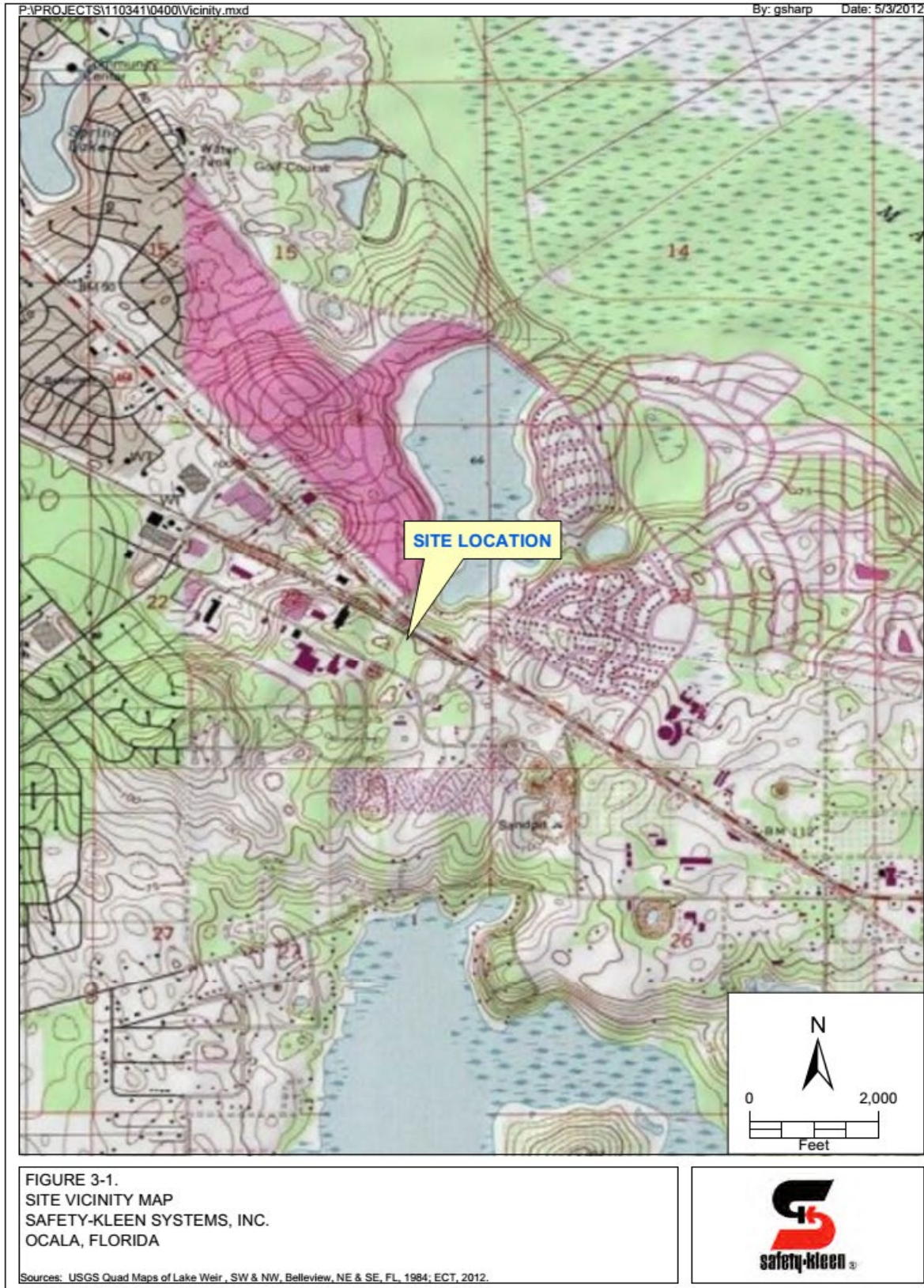
1. 33 aboveground storage tanks (ASTs) in the outdoor tank farm, constructed in concrete secondary containment structures,
2. solid waste management / processing area (SWMA), with no on-site disposal,
3. rail car spur with an unloading/loading area (located just outside the property boundary, in the railroad spur right-of-way),
4. warehouse building with:
 - a. Area “WB-PADC” (north half): oil processing area that will soon also serve as a “Mini-DC”, or mini. distribution center,
 - b. control room (center),
 - c. Area “WB-FP” (south half): Used oil Filter Processing area. Includes oil used oil filter pit, conveyor, sorter, crusher, and staged roll-off container for used oil filter processing. Also has area for storing oil filter drums (“exempt drained oil filters”) and 330-gallon totes for new oil sales,
5. administration / office building,
6. unpaved grass-covered areas,
7. two dry retention ponds, and
8. parking and truck staging areas.

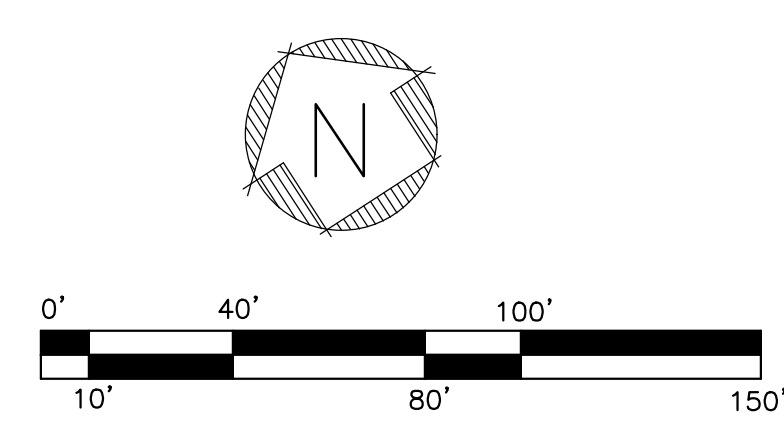
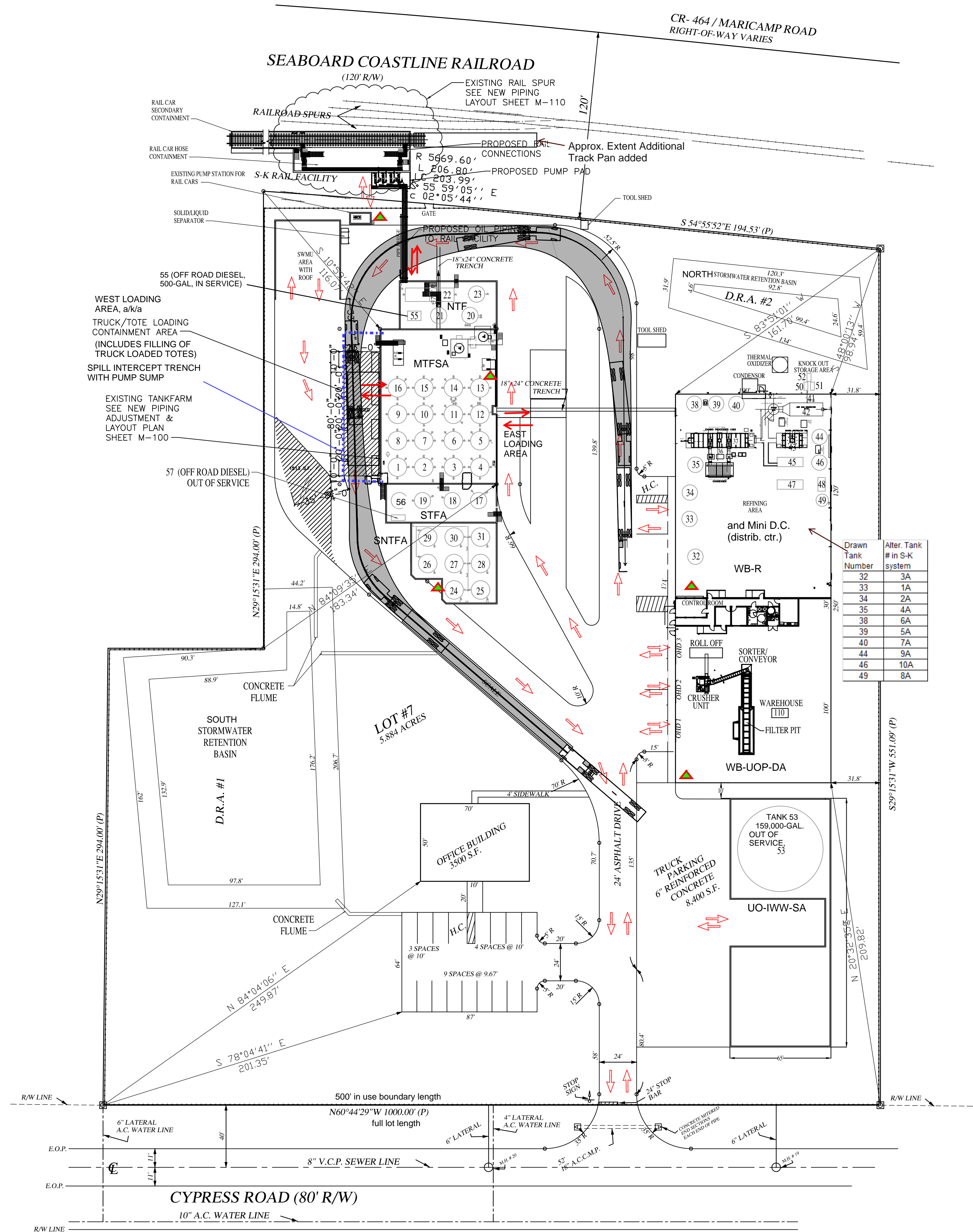
With the exception of the rail car area, the site is fenced and access is controlled by a gate and chain-link fence. The facility is manned 24 hours per day, Monday through Friday.

A used oil/industrial wastewater storage area (UO-IWW-SA) in the southeast areas of the site provided partial secondary containment for two (2) 159,000-gallon, field-erected ASTs. One of the ASTs has been removed. The second is and will remain out of service and is planned to be removed.

(Text continued after Figures 1, 2 and 3 on the next pages.)

Figure 1. Site Location Map





Containment Area Designations	
WB-PADC	Warehouse Bldg., Processing Area / Mini-Distribution Center, north half of building
WB-FP	Warehouse Building, Used Oil Filter Processing and Drum Storage Area, south half of building
KO-SA	Knockout Storage Area
SNTFA	Southern [southernmost] Tank Farm Area
STFA	South Tank Farm Area (now central one, since SNTFA was built later to its south)
MTFCA or MTFSA	Main Tank Farm Containment Area, or MTFSA Main Tank Farm Storage Area
NTF	North Tank Farm
WLA Trench	West Truck Loading Area - Spill Interceptor or Capture Trench
RRL-CA	Railroad Loading Containment Area
RR-TP	Railroad Containment Track Pans
RR LA - Total	Railroad Loading Area - total combined containment
UO-IWW-SA	Used Oil & Industrial WW Storage Area

Figure 2
Site Map
(with Tank Locations and Numbers)

SPCC Plan

Not for Construction.

- Material Flow Direction
- Spill Kit Location

PROPRIETARY STATEMENT

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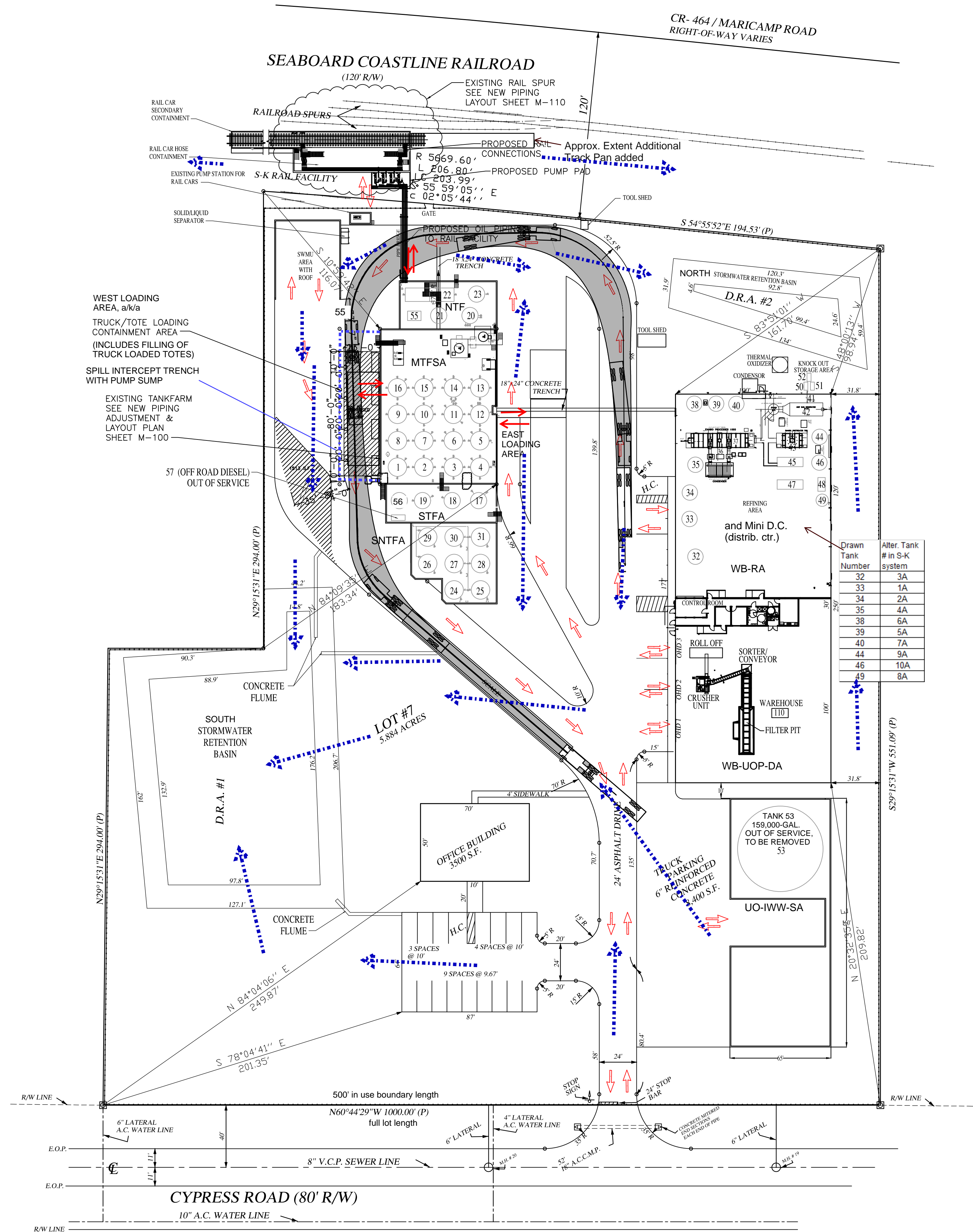
Based on Drawing by N.D. Eryou, PhD, P.E.
for S-K Systems, Inc.

Marked up for SPCC Plan use by
Landmark Solutions, LLC

Not for Construction.

TITLE	
359 CYPRESS RD. OCALA, FL. 34472 (7377-SP00-006)	
SAFETY-KLEEN SYSTEMS, INC. 2600 N. CENT. EXPRESSWAY SUITE 400 RICHARDSON, TX. 75080 PHONE 800-669-5740	
SCALE 1"=40'-0"	BY JEK CHKD AN APPROVED AN OPERATIONS AN DATE 5/11/16
NO.	DESCRIPTION
REVISIONS	
SERVICE CENTER LOCATION OCALA, FL.	
SC-DWG NUMBER C-200	
REV. NO. B	

B	ASBUILT RAIL PIPING	JEK	AN	AN	050517
A	ADD NOTES	JEK	AN	AN	063016
0	ISSUED FOR REVIEW	JEK	AN	AN	051116
NO.	DESCRIPTION	BY	CHK	APPR	DATE
REVISIONS					



Containment Area Designations	
WB-PADC	Warehouse Bldg., Processing Area / Mini-Distribution Center, north half of building
WB-FP	Warehouse Building, Used Oil Filter Processing and Drum Storage Area, south half of building
KO-SA	Knockout Storage Area
SNTFA	Southern [southernmost] Tank Farm Area
STFA	South Tank Farm Area (now central one, since SNTFA was built later to its south)
MTFCA or MTFSA	Main Tank Farm Containment Area, or MTFSA Main Tank Farm Storage Area
NTF	North Tank Farm
WLA Trench	West Truck Loading Area - Spill Interceptor or Capture Trench
RRL-CA	Railroad Loading Containment Area
RR-TP	Railroad Containment Track Pans
RR LA - Total	Railroad Loading Area - total combined containment
UO-IWW-SA	Used Oil & Industrial WW Storage Area

Figure 3

Site Drainage Flow Map

SPCC Plan

Not for Construction.

GENERAL NOTES	
	DIRECTION OF PREPROCESS MATERIAL FLOW
	Surface Drainage Flow Direction

PROPRIETARY STATEMENT	
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Based on Drawing by N.D. Eryou, PhD, P.E. for S-K Systems, Inc.

Marked up for SPCC Plan use by Landmark Solutions, LLC

Not for Construction.

						TITLE			
						359 CYPRESS RD. OCALA, FL. 34472 (7377-SP00-006)			
B	ASBUILT RAIL PIPING	JEK	AN	AN	050517		SAFETY-KLEEN SYSTEMS, INC.		
A	ADD NOTES	JEK	AN	AN	063016		2600 N. CENT. EXPRESSWAY SUITE 400 RICHARDSON, TX. 75080 PHONE 800-669-5740		
O	ISSUED FOR REVIEW	JEK	AN	AN	051116				
NO.	DESCRIPTION	BY	CHK	APPR	DATE	SCALE 1"=40'-0"		BY JEK	CHKD AN
REVISIONS						APPROVED AN		OPERATIONS AN	
						DATE 5/11/16			
						SERVICE CENTER LOCATION		SC-DWG NUMBER	
						OCALA, FL.		C-200	
								REV. NO.	
								B	

The subject S-K facility packages/supplies new oil, processes used oil, and sends resulting solid and liquid wastes to permitted off-site facilities for proper final treatment or disposal. The facility employs approximately 15 persons, plus transport drivers.

Operations at the S-K Facility include the following:

1. Processing, storage, and transfer of used oil.
2. Collection of used oil from oil filters.
3. Collection of the drained/crushed oil filters and oil-impacted waste (e.g., soil, rags, absorbent materials, etc.).
4. Storage and transfer of new oils, using 10 of the pre-existing aboveground storage tanks (ASTs) in the large, outdoor, Main Tank Farm with secondary containment.
5. Storage and transfer of industrial wastewaters, including petroleum contact water (PCW).
6. Warehousing (staging) of other packaged oil-related products.
7. Processing of used oil. This processing does not constitute oil “refining” and is NOT to be regulated as a “refinery” facility.

Any references in this plan to “oil” may mean any of the above oils (new, used, etc.).

3.3 FACILITY OIL STORAGE [112.7(A)(3)(i)]

40 CFR 112.2 defines “oil” as:

“Oil means oil of any kind or in any form, including, but not limited to: fats, oils, or greases of animal, fish, or marine mammal origin, vegetable oils, including oils from seeds, nuts, fruits, or kernels; and, other oils and greases, including petroleum, fuel oil, sludge, mineral oils, oil refuse, or oil mixed with wastes other than dredged spoil”

“Bulk Storage Container” is defined as:

“Means any container used to store oil. These containers are used for purposes including, but not limited to, the storage of oil prior to use, while being used, or prior to further distribution in commerce. Oil-filled electrical, operating, or mechanical equipment is not a bulk storage container.”

As noted in the above definition, EPA has specifically excluded oil-filled electrical, operating, or manufacturing equipment from the definition of bulk storage container. This type of equipment is exempt from certain requirements of the SPCC rule, including secondary containment and integrity testing; however, general requirements for spill prevention and response provided in 112.7 are applicable to ensure any discharge does not reach navigable waters. The volume of oil storage in this equipment must also be listed in the SPCC Plan and the equipment locations shown on the facility drawings with this Plan.

Oil storage at the facility consists of:

- used oil,
- fuel oil,
- diesel oil,
- dehydrated oil,
- industrial wastewater (i.e., oily water),
- diesel fuel,
- lubricating oil,
- cutting oil,
- new parts washer (petroleum-based solvent), in 40-gallons drums,
- and finished packaged oil/petroleum products in 2.5 gallon jugs.
- Other petroleum products (i.e, oil, grease, gasoline, etc.) used by the facility are stored in small containers (i.e., 5 gallons or smaller).

Smaller containers (under 55 gallons) are not subject to the SPCC requirements and are not to be counted towards the total oil storage capacity of the facility for evaluating the potential for significant harm criteria, per 40 CFR Part 112.1(d) and EPA guidance.

Table 3 lists the oil storage containers (tanks) with volumes of 55 gallons or more. The list also provides their respective volumes, contents, and locations, also shown on **Figure 2**.

(**Table 3** starts on the next page.)

Table 3. Oil Storage Containers

Tank Number	Alter. Tank No. in S-K system, if different	Tank Type	Tank Capacity (gallons)	Tank Contents (Type of Oil)	Location Onsite	Installation Date	In Secondary Containment?
1		AST	30,000	PCEO	MTFCA (Main Tank Farm Containment Area)	December, 1999	Yes
2		AST	30,000	SHDEO	MTFCA	December, 1999	Yes
3		AST	30,000	Fuel oil	MTFCA	December, 1999	Yes
4		AST	30,000	Fuel oil	MTFCA	December, 1999	Yes
5		AST	30,000	Used oil	MTFCA	December, 1999	Yes
6		AST	30,000	Used oil	MTFCA	December, 1999	Yes
7		AST	30,000	SHDEO	MTFCA	December, 1999	Yes
8		AST	30,000	PCEO	MTFCA	December, 1999	Yes
9		AST	30,000	PCEO	MTFCA	December, 1999	Yes
10		AST	30,000	SHDEO	MTFCA	December, 1999	Yes
11		AST	30,000	Used oil	MTFCA	December, 1999	Yes
12		AST	30,000	Used oil	MTFCA	December, 1999	Yes
13		AST	30,000	SO	MTFCA	December, 1999	Yes
14		AST	30,000	HO	MTFCA	December, 1999	Yes
15		AST	30,000	HO	MTFCA	December, 1999	Yes
16		AST	30,000	HO	MTFCA	December, 1999	Yes
17		AST	20,000	IWW	STFA (South Tank Farm)	2,001	Yes
18		AST	20,000	IWW	STFA	2,001	Yes
19		AST	20,000	IWW	STFA	2,001	Yes
20		AST	20,000	IWW	NTF (North Tank Farm)	2,002	Yes
21		AST	20,000	IWW	NTF	2,002	Yes
22		AST	20,000	Anti-Freeze	NTF	2,002	Yes
23		AST	20,000	IWW	NTF	2,002	
24		AST	30,000	Used Oil	SNTFA (Southern Tank Farm Area)	2,003	Yes
25		AST	30,000	Used Oil	SNTFA	2,003	Yes
26		AST	30,000	Used Oil	SNTFA	2,003	Yes
27		AST	30,000	Used Oil	SNTFA	2,003	Yes
28		AST	30,000	Used Oil	SNTFA	2,003	Yes
29		AST	30,000	Used Oil	SNTFA	2,003	Yes
30		AST	30,000	Used Oil	SNTFA	2,003	Yes
31		AST	30,000	Used Oil	SNTFA	2,003	Yes
32	3A	AST	13,000	Fuel Oil	WB-PADC (Warehouse Bldg., Process Area/ Mini-Distribution Center)	December, 1999	Concrete floor with Curb
33	1A	AST	2,700	Fuel Oil	WB-PADC	December, 1999	Concrete floor with Curb
34	2A	AST	2,700	Fuel Oil	WB-PADC	December, 1999	Concrete floor with Curb

Tank Number	Alter. Tank No. in S-K system, if different	Tank Type	Tank Capacity (gallons)	Tank Contents (Type of Oil)	Location Onsite	Installation Date	In Secondary Containment?
35	4A	AST	6,500	Used Oil	WB-PADC	December, 1999	Concrete floor with Curb
36		PT	3,000	Fuel Oil	WB-PADC	December, 1999	Concrete floor with Curb
37		PT	1,000	Processor/dehydrator #3	WB-PADC	December, 1999	Concrete floor with Curb
38	6A	AST	6,000	Low Flash Recovery	WB-PADC	December, 1999	Concrete floor with Curb
39	5A	AST	6,000	Recovered Process Water	WB-PADC	December, 1999	Concrete floor with Curb
40	7A	AST	6,000	Low Flash Recovery	WB-PADC	December, 1999	Concrete floor with Curb
41		PT	110	Knockout Tank	WB-PADC	December, 1999	Concrete floor with Curb
42		PT	12,000	Hot Gas Generator	WB-PADC	December, 1999	Concrete floor with Curb
43		PT	110	Knockout Tank	WB-PADC	December, 1999	Concrete floor with Curb
44	9A	AST	6,000	Low Flash Recovery	WB-PADC	December, 1999	Concrete floor with Curb
45		PT	1,000	Dehydrator #2	WB-PADC	December, 1999	Concrete floor with Curb
46	10A	AST	6,000	Fuel Oil Mineral Oil	WB-PADC	December, 1999	Concrete floor with Curb
47		PT	1,000	Dehydrator #1	WB-PADC	December, 1999	Concrete floor with Curb
48		PT	500	Burner Fuel (day tank type use)	WB-PADC	December, 1999	Concrete floor with Curb
49	8A	AST	6,000	Low Flash Recovery	WB-PADC	December, 1999	Concrete floor with Curb
50		PT	2,000	Knockout Tank	KO-SA (Knockout Storage Area)	December, 1999	Yes
51		PT	1,000	Knockout Tank	KO-SA	December, 1999	Yes
52		PT	300	Knockout Tank	KO-SA	December, 1999	Yes
53		AST	159,000	Used Oil	UO-IWW-SA (Southeast Containment Area)	2005 (to be removed 2017+)	Yes, partial
54		AST	159,000	IWW	UO-IWW-SA	2005 (removed)	Yes, partial
55		AST	9400	Stormwater	NTF	December, 1999 (removed)	Yes
56		AST	14,100	Stormwater	STFA	2,001	Yes
57		AST	1,100	Off-road Diesel Fuel (out of service – 2020)	STFA	2,001	Yes
Drums		Drums	22,000	Various = 55 gal/drum x 400 drums	WB-FP (Warehouse Building, Used Oil Filter Processing Area and Drum Storage, south half of building)		Concrete floor with Curb

Tank Number	Alter. Tank No. in S-K system, if different	Tank Type	Tank Capacity (gallons)	Tank Contents (Type of Oil)	Location Onsite	Installation Date	In Secondary Containment?
Totes		Totes	16,500	Various = 330 gal/tote x 50 totes	WB-FP (Warehouse ... south half)		Concrete floor with Curb
Total Facility Storage Capacity			996,620	Gallons	Excludes the out-of-service 159,000-gallon AST		
Threshold			1,000,000	for "Substantial Harm Criteria" or formula evaluation			
Available:			3,380	gallons of capacity remaining under the "Subst. Harm Criteria" threshold			

LEGEND:

AST = Aboveground Storage Tank
PT = Process Tank
PCEO = Passenger Car Engine Oil (AW Material)
SHDEO = Synthetic Heavy Duty Oil (Synthetic Blends)
HO = Hydraulic Oil (AW Material)
SO = Synthetic Oil (Full Synthetic)
IWW = Industrial Waste Water
UO-IWWSA = Southeast Containment Area = Used Oil & IWW Storage Area

~~159,000~~ = Tank not in service or removed. Volume not counted towards total.

Note: PT Process Tanks do not normally contain oil overnight and may not contain their full capacity of oil during process. These PT tanks could qualify as Oil-Filled Equipment. If so classified, their capacities would NOT count toward the facility's Total Oil STORAGE Capacity, so the total estimate would be reduced. To be conservative and simplify, they were counted in the above total. In particular, Tank 42, the Hot Gas Generator, is not a tank per se, but a heater using oil as fuel.

Source: ECT, S-K, 2012. S-K, Landmark Solutions 2017.

Table 3.A. Oil-containing Equipment
(Electrical, Operating, or Mechanical)
(exempt from various SPCC requirements)

Container or Equipment Type	Container Volume (gallons)	Contents (Type of Oil)	Location Onsite
Power utility Transformer (electrical equipment)	<500	Mineral Oil	In front of (south side of) facility Office Building. Inferred vol.
Air Compressors (3)	1.5	Hydraulic Oil	+1 quart x 2 a/c's +3 qts. x 1 a/c

3.4 FACILITY DISCHARGE PREVENTION MEASURES [112.7(A)(3)(II)]

The referenced CFR citation states (with bold emphasis added):

*“(3) ...You must address in your plan: ...
(ii) Discharge **prevention measures** including procedures for routine handling of products (loading, unloading, and facility transfers, etc.);”*

S-K provides for adequate discharge prevention measures through the implementation of this Plan. For example:

1. All employees handling oil and their supervisors are trained in the topics covered by this Plan to reduce the likelihood of a discharge of oil. This training is intended to reduce the likelihood of a discharge of oil and is conducted upon commencement of employment and refreshed annually.
2. Routine inspections are conducted to discover any discharges and to prevent future discharges by noting any apparent corrective actions that may be required.
3. Security measures are in place to allow the discovery of any discharges and to deter vandalism that might result in a discharge.
4. When loading/unloading oil from/to the bulk storage tanks, procedures are in place that minimize the potential for accidental discharges.
5. Facility personnel closely supervise transfer operations during all stages of loading/unloading.
6. Spill cleanup material (spill kits) are provided near loading/unloading activity areas.

3.5 FACILITY DISCHARGE AND DRAINAGE CONTROLS [112.7(A)(3)(III)]

The referenced CFR citation states:

*“(3) ...You must address in your plan: ...
(iii) **Discharge or drainage controls** such as secondary containment around containers and other structures, equipment, **and procedures** for the control of a discharge;”*

S-K has provided adequate discharge and drainage controls through the implementation of this Plan. All oil containers are provided with adequate secondary containment and/or alternative equivalent measures. **Table 4** provides details and calculated volumes of the major secondary containments and the two retention ponds. Several spill kits equipped with absorbent material and other response equipment are located at the throughout the warehouse and tank farm areas. The location of the spill kits are shown on **Figure 2**.

Table 4. Containment Volume Calculations

Spill Prevention, Control, and Countermeasure Plan

Safety-Kleen Systems, Inc.

Ocala, Marion County, FL

Calculation Parameter	Area: Units:	WB-PADC	WB-FP	KO-SA	SNTFA-1	SNTFA-2	SNTFA-Total	STFA	MTFCA	NTF	WLA Trench	RRL-CA	RR-TP	RR LA - Total	North Ret.Pond	South Ret.Pond
L	feet (ft)	120	100	15	51	35		24	98	30	128	74	8		21	147.45
W	ft	100	100	25	35	20		70	70	61	1.67	14	180		107	112
Area	SF	12,000	10,000	375	1,785	700	2,485	1,680	6,860	1,830	213	1,036	1,440	2,476	2,238	16,581
H	ft	0.25	0.25	0.77	4	4	4	4.08	4.08	4.08	1.00	1.9	0.42		3	3.7
Volume	CF	3,000	2,500	287	7,140	2,800	9,940	6,860	28,012	7,473	213	1,986	600	2,586	6,713	60,796
Containment Volume	Gallons	22,440	18,700	2,150	53,407	20,944	74,351	51,313	209,527	55,894	1,596	14,853	4,488	19,341	50,211	454,755
Max. Tank Vol.	Gallons	13,000	330	2,000	30,000	30,000	30,000	13,000	30,000	30,000	30,000	30,000	30,000	30,000		
Tank No.		32	Tote	50	24	29	32	32	16	16	16	Rail Car	Rail Car	Rail Car		
Contained?	(Yes/No)	Yes	Yes	Yes	Yes	No	Yes	Yes	Yes	Yes	No	No	No	No	Yes	Yes
Excess Volume	Gallons	9,440	18,370	150	23,407	(9,956)	44,351	38,313	179,527	25,894	(28,404)	(15,147)	(25,512)	(10,659)	50,211	454,755
Excess Volume	CF	1,262	2,456	20	3,129	(1,211)	5,929	5,122	24,001	3,462	(3,797)	(2,025)	(3,411)	(1,425)	6,713	60,796
Avail. Freeboard for Precipitation	inches	1.26	2.95	0.64	21.04	(20.75)	28.63	36.59	41.98	22.70	(213.60)	(23.46)	(28.42)	(6.91)	36.00	44.00
NOTES:												23"-deep				
				Area estd using								Concrete	Track pans			
				2y Vol fr 2011								Contnmt.	5"			

NOTES:

Conversion:	Gal/CF	7.48	CF = Cubic feet = ft ³	Sum of Outdoor Tank Farm Containments = SNTFA + STFA + MTFSA + NTF =	391,086	Gallons
Conversion:	in/ft	12	SF = Square feet = ft ²		52,284	CF
					12,855	SF area

WB-PADC = Warehouse Bldg., Processing Area / Mini-Distribution Center, north half of building
WB-FP = Warehouse Building, Used Oil Filter Processing and Drum Storage Area, south half of building
KO-SA Knockout Storage Area
SNTFA Southern [southernmost] Tank Farm Area
STFA South Tank Farm Area (now central one, since SNTFA was built later to its south)
MTFCA Main Tank Farm Containment Area, or MTFSA Main Tank Farm Storage Area
NTF North Tank Farm
WLA Trench West Truck Loading Area - Spill Interceptor or Capture Trench
RRL-CA Railroad Loading Containment Area
RR-TP Railroad Containment Track Pans
RR LA - Total Railroad Loading Area - total combined containment

Source: S-K drawings, 2016. Landmark Solutions, 2017.

3.6 FACILITY DISCHARGE COUNTERMEASURES [112.7(A)(3)(IV)]

The referenced CFR citation states:

*“(3) ...You must address in your plan: ...
(iv) **Countermeasures** for discharge discovery, response, and cleanup (both the facility's capability and those that might be required of a contractor);”*

S-K provides for adequate means for the discovery, response, and cleanup of discharges of oil through the implementation of this Plan, summarized as follows:

1. Potential discharges will be discovered through routine inspections.
2. If such a discharge is discovered, appropriate response and cleanup measures are in place.
3. If the required countermeasures warrant additional help, outside contractors are hired and mobilized expeditiously to augment facility capabilities.
4. Any cleanup beyond discharge response is considered remediation and is beyond the scope of this Plan.

4. DISCHARGE RESPONSE

4.1 EMERGENCY CONTACTS [112.7(A)(3)(VI)]

4.1.1 FACILITY CONTACTS

Facility Response Coordinator:

Wanda Hutchinson
Terminal Manager

Office: (352) 537-3071

Mobile: (352) 480-7828

Fax: (352) 687-8511

Home Cell: (352) 476-4125

Home Address: 3240 SW 34th Street, Apt 802
Ocala, FL 34474

Alternate Contact:

Joseph Ventry
Operations Manager

Office: 352-537-3073

Mobile: 352-425-4520

Home Cell: 352-266-2206

Home Address: 2337 NE 12 Ct.
Ocala, FL 34470

Safety-Kleen 24 hr. ER Number

Telephone: (800) 468-1760

**Corporate Facility Owner Contact
(off-site):**

Jeffery Curtis
Senior Environmental Compliance Manager
Mobile: (561) 523-4719
Email: jeff.curtis@safety-kleen.com
Mailing Address: 359 Cypress Road
Ocala, Florida 34472

4.1.2 DISCHARGE NOTIFICATION

National Response Center

Toll-free: (800) 424-8802

Telephone: 202-267-2675

**United States Environmental Protection
Agency (EPA) Region 4**

Telephone: (404) 562-9900

Toll Free: (800) 241-1754

State Warning Point

Toll Free: (800) 320-0519

Telephone: (850) 413-9911

FDEP Central District

Telephone: (407) 897-4100

Local Authority
(Alachua County Health
Department, Storage Tank Program,
serving Marion County)

Telephone: 352-264-6800

4.1.3 STATE AND LOCAL EMERGENCY RESPONSE AGENCIES

Fire/Police Department

Telephone: 911

4.1.4 AVAILABLE SPILL RESPONSE CONTRACTORS

Clean Harbors Environmental Services

Telephone: (800) 468-1760

Consultants do NOT perform response actions or supply equipment, but they may be retained by S-K to help oversee response action, advise, assess, interact with agencies, prepare reports, etc.:

3Leaf Solutions, LLC (environmental consultant) Telephone: (813) 494-5263

Landmark Solutions, LLC (spill cleanup consulting engineer): (813) 503-6319

4.2 DISCHARGE RESPONSE PROCEDURES [112.7(A)(5)]

The discharge response procedures listed below should be followed by facility response personnel to contain discharges and to minimize dangers from an oil discharge to public health, personnel safety, the facility, and the environment.

4.2.1 PERSON DISCOVERING DISCHARGE

1. Quickly assess the severity of the discharge in terms of quantity and consequences.
2. Alert any other facility personnel working in the area of the spill.
3. Notify the Facility Response Coordinator and report:
 - a. the location of the discharge,
 - b. the type of material discharged,
 - c. the quantity of material discharged,
 - d. and any additional information that the Coordinator may need.
4. If personnel adequately trained in discharge response are available, the Facility Response Coordinator (or designee) will implement the procedures in Section 4.2.3 to contain the discharge.
5. Otherwise:
 - a. summon additional trained personnel to respond to the discharge.
 - b. **Stay at a safe distance and location**, and stay in contact as requested until you verify that trained personnel are arriving, taking over response actions, and relieving you of the post.

That is, do not leave until responders arrive and you are relieved. Should

responders misunderstand the spill location and not show up where needed, you will need to help communicate with staff and direct them to the correct location.

6. Complete as much of the appropriate S-K Discharge Report Form as possible (this Form is found in Appendix B) and provide it to the S-K Facility Response Coordinator. Do this only when and where it is safe to divert your attention from your surroundings.

4.2.2 FACILITY RESPONSE COORDINATOR

Based on the information provided by the person who discovered the discharge, perform the following functions in the order that is warranted to protect personnel, and environment, and comply with reporting requirements, given the specific situation:

1. notify the appropriate agencies of the discharge in accordance with the requirements listed in Section 4.3.
2. Oversee spill response in containing the discharge, as necessary.

4.2.3 RESPONSE PROCEDURE

The order of Response steps depends on the situation. Re-order the response steps as needed, first and foremost, to protect human life and limb, to prevent fires or explosions or other catastrophic hazards, and then to protect the environment and property.

1. “Survey the scene”:

- a. **Pause** before moving in.
- b. **Look** for hazards.
- c. Ensure your next actions or steps **do not put you or others in more danger**.
- d. **Otherwise, withdraw and call** and wait in a safe location for other responders.
- e. **If starting actions:**
 - i. **notify** another qualified employee, manager, or Facility Response Coordinator,
 - ii. ask for help,
 - iii. ask for them to check back on you for your safety.

2. Stop the oil release at the source.

3. Obtain discharge response equipment from the nearest **spill kit**.

4. **Decide if best for safety to:**

- a. Stop further spillage or release at its source,

OR

- b. Prevent further flow of discharge downstream.
 - c. Reorder the steps in this section as needed to ensure safety first.
5. Consider these factors:
- a. **Stopping the source FIRST**
 - i. reduces the amount that can discharge, spread, and cause other hazards (especially in the case of fuel and fire hazards),
 - ii. so that smaller containment efforts can work effectively,
 - iii. but allows the existing spillage to flow farther.
 - b. **Protecting the Drains FIRST**
 - i. might prevent a larger environmental cleanup,
 - ii. unless delaying source stoppage lets the spill volume rise to cause greater hazards or impacts, than delaying the drain protection would cause.
6. **Isolate nearby floor drains or storm drains or low drainage areas:**
- a. Place absorbent socks or pigs just ahead of the leading edge of the flow, to stem its flow to a downstream drain.
 - b. Place drain covers on any nearby drains or inlets.
7. If inside, place absorbent socks along the bottom of nearby...
- a. **exterior doorways**, to prevent flow to the environment, and
 - b. **interior doorways**, to prevent flow to other rooms.
8. Stop the flow of spilled material by **surrounding** it with absorbent socks.
9. Spread granular absorbent on the spilled oil to **stabilize** and to contain the material.
10. Use **Vacuum trucks** for larger spills.
11. Use a shovel or other tools to scoop the absorbent material and absorbed oil and place it in an empty drum. Properly label the drum.
12. Use soapy water, detergent, or other appropriate materials to clean up the remaining oil.
13. Allow flow into drains only after any visible oil sheen has been removed.
14. Restock the spill kit as necessary.

4.3 DISCHARGE NOTIFICATION

Appendix B contains blank S-K and FDEP discharge report forms for the facility. The forms ask for many types of information and this broad range of information covers the information that must be reported internally, to inform the various oral and written notifications to federal and state agencies. Not all of this information will be required for a given situation; please refer to Sections 4.3.1 and 4.3.2 for the specific requirements or consult the Facility Response Coordinator. However, try to have as much of the information available as possible.

Notifications to government agencies is required for discharges.

- All such notifications to agencies shall be made by the S-K Facility Response Coordinator or the S-K Alternate Contact.
- If these personnel are not immediately available, attempt to contact them.
- If not reached promptly and spoken with live (not just email or messages), the corporate contact person or else the next person in charge of the facility at the time shall make the verbal notifications to the agencies.

4.3.1 ORAL NOTIFICATIONS [112.7(A)(4)]

4.3.1.1 FEDERAL CRITERIA

Under the Clean Water Act, discharges of oil to navigable waters of the United States meeting the following criteria may be harmful to the public health or welfare or the environment and must be reported:

- Discharge causes violations of applicable water quality standards;
- Discharge causes a film or sheen upon, or discoloration of, the surface of the water or adjoining shorelines, or,
- Discharge causes a sludge or emulsion to be deposited beneath the surface of the water or upon adjoining shorelines.

Such a discharge does not have to be large. For example, a pint of oil can cover one acre of water surface area. Note that the above federal criteria do not have any threshold quantity. Navigable waters includes lesser water bodies that are still regulated as navigable, because they lead to and can impact navigable waters.

4.3.1.2 FEDERAL AGENCY ORAL NOTIFICATIONS

An immediate notification of any discharge meeting the federal criteria (e.g., any sheen, emulsion, or water quality standard violation) must be made to the National Response Center (NRC).

National Response Center

(800) 424-8802

If notification to the NRC is not possible, the spill must be reported verbally to **EPA Region 4**.

U.S. EPA Region 4

(800) 241-1754 or (404) 562-8700

4.3.1.3 STATE AND LOCAL AGENCY ORAL NOTIFICATION CONTACTS

Discharges that do not involve spills to navigable water in excess of threshold quantities, or which pose an immediate threat to human health or the environment, must be immediately reported to the **State Warning Point** or **Local Fire Department** at these phone numbers:

State Warning Point

(800) 320-0519

Local Emergency Response – Fire/Police Department 911

FDEP Central District

(407) 893-3337

Local Warning Point

(Alachua County Health
Department, Storage Tank Program,
serving Marion County)

Telephone: 352-264-6800

Please see Section 4.1 and Page 4-1 for the full list of Emergency Contacts.

4.3.1.4 ORAL NOTIFICATION CONTENT

When notifying any of the above agencies, the following information must be provided:

1. Exact address or location and phone number of the facility.
2. Date and time of the discharge.
3. Type of material discharged.
4. Estimates of the total quantity discharged.
5. Estimates of the quantity discharged into or upon the navigable waters of the United States or adjoining shorelines.
6. Source of the discharge.
7. Description of all affected media.
8. Cause of the discharge, if known.
9. Damages or injuries caused by the discharge.
10. Actions being used to stop, remove, and mitigate the effects of the discharge.
11. Whether an evacuation may be needed.
12. The names of individuals and/or organizations who have also been contacted.

Additionally, try to have as much of the following information available as possible:

1. Your name, location, organization, and telephone number.
2. Name and address of the party responsible for the incident.
3. Danger or threat posed by the release or discharge.
4. Weather conditions at the incident location.
5. Any other information that may help emergency personnel respond to the incident.

Clearly **document all verbal notifications**, both by taking notes while speaking with agencies and then, when time allows, by writing follow-up documentation emails to S-K contacts. Notes shall include:

- The S-K person who called the agency,
- date, exact time of call,
- agency called,
- agency person spoken with or with whom you left a voice mail,
- details reported,
- any Incident Number assigned by the agency,
- and any other information, contacts, or directives provided by the agency.

4.3.2 WRITTEN NOTIFICATIONS [112.4(A), 112.4(C)]

4.3.2.1 FEDERAL

The EPA requires that a written report be submitted within 60 days to the appropriate Regional Administrator and State agency, whenever there is:

- a **single discharge** of oil exceeding **1,000 gallons**
- **or two discharges of oil exceeding 42 gallons each within any 12-month period.**

Send the reports to the following addresses:

United States Environmental Protection Agency, Region 4
SPCC/FRP Coordinator
61 Forsyth Street, SW
Atlanta, Georgia 30303-3104

A copy of this written report will be sent to the state at the following address:

Emergency Response Manager
State of Florida Department of Environmental Protection
3319 Maguire Boulevard, Suite 232
Orlando, Florida 32803-3767

The **written report** must contain the following information:

1. Name of the facility;

2. Name and contact information of responsible person;
3. Location of the facility;
4. Maximum storage or handling capacity of the facility and normal daily throughput;
5. Corrective action and countermeasures you have taken, including a description of equipment repairs and replacements;
6. An adequate description of the facility, including maps, flow diagrams, and topographical maps, as necessary;
7. The cause of the discharge, including a failure analysis of the system or subsystem in which the failure occurred;
8. Additional preventative measures taken or contemplated to minimize possibility of recurrence; and,
9. Such other information as the Regional Administrator may reasonably require pertinent to the Plan or discharge.

Although the U.S. EPA Regional Administrator may request a copy of the SPCC Plan, after reviewing the spill notification report, it is not necessary to include a copy of the Plan with the report.

4.3.2.2 STATE

In summary, State of Florida rules require the following:

- A. Notification and reporting upon **discovery of a discharge** of petroleum or petroleum products, or **upon discovery of resulting contamination**.
- B. That notification shall be submitted to the Florida Department of Environmental Protection (FDEP) using their Discharge Report Form (Form Number 62-761.900(1)).
- C. Discharges that exceed certain “reportable quantities” onto the surface of lands (such as 25 gallons) or into surface waters (any amount) shall be reported to the State Warning Point or Department of Environmental Protection, Office of Emergency Response as soon as possible, but no later than 24 hours after occurrence.

Appendix B contains a copy of blank FDEP reporting forms referenced below (i.e., the INF and DRF). Copies of all completed reports and any attachments are to be maintained in **Appendix B**, or in separate files.

FDEP refers to the Florida Department of Environmental Protection. OER refers to the FDEP’s Office of Emergency Response. Local Program refers to a County tanks inspection program, to which the FDEP has delegated its authority for storage tank compliance and/or site cleanup (site remediation) for certain counties.

The following sub-sections provide rule definitions and specific thresholds for reporting of actual or suspected oil discharges, per the State of Florida (FDEP) requirements.

4.3.2.2.1 RELEVANT STATE RULES CHAPTERS

In addition to the Federal Regulations, the State of Florida has requirements for notification and reporting discharges. The most relevant ones are found in the following rule chapters from the Florida Administrative Code (F.A.C):

- Chapter 62-762, the aboveground storage tank (AST) rule:
 - This rule technically applies to this S-K Facility, primarily because one or more aboveground tanks here exceed 550 gallons capacity.
- Chapter 62-761, the underground storage tank (UST) rule:
 - This rule technically does not apply to this S-K Facility, because it does not have USTs.
 - This rule chapter is nonetheless referenced by other chapters since it contains the forms required for reporting releases or suspected releases.
- Chapter 62.780, the contaminated site cleanup rule:
 - This rule applies to “any” spilling, leaking, etc.
- Chapter 62-777:
 - This rule applies, since it specifies the threshold chemical concentrations that define “contamination” of soil, groundwater, fresh surface water, and marine surface waters.

4.3.2.2.2 DEFINITIONS *in* STATE RULES *for* REPORTING

The aboveground storage tank (AST) rule section FAC 62-762.201 defines these terms relevant to *Notifications* and *Reporting* as follows, with emphasis added:

(39) **“Incident”**

*is a condition or situation indicating that a discharge **may have occurred** from a storage tank system.*

(20) **“Discovery”** means:

*(a) Either actual knowledge or knowledge of facts that could reasonably lead to actual knowledge of the existence of **an incident, discharge, or an unmaintained storage tank system**; ...*

(67) **“Release”** means:

*(a) A **discharge**; or*

*(b) A **loss** of regulated substances from a storage tank system **into the system’s secondary containment**. [not necessarily a “discharge” or “contamination”]*

(19) **“Discharge”** includes, but is not limited to,

any **spilling, leaking, seeping, pouring, misapplying, emitting, emptying, or dumping of any regulated substance which occurs and which affects lands and the surface and ground waters of the state. [regardless of reportable quantities in the tank rules]**

4.3.2.2.3 STATE REPORTABLE QUANTITIES

The referenced rule chapters have several requirements for reporting, as well as exceptions. **Each situation may warrant special review.** Following is a **summary only**:

- A. The AST Rule 62-762.451(2) requires that **Notification** of the following **Incidents** be made to the FDEP (or its delegated local/County tanks compliance program) on **Incident Notification Form (INF)** [Form 62-761.900(6)], **within 24 hours or** before the close of the County's next business day:
1. The loss of a regulated substance from a storage tank system exceeding 100 gallons on impervious surfaces, other than secondary containment, provided that the loss does not come in contact with pervious surfaces,
 2. The loss of a regulated substance exceeding 500 gallons inside a dike field area with secondary containment.
 3. odors from soil or waters that could reasonably indicate contamination,
 4. storage system failures or alarms, or,
 5. visible "free product", that is, fuel or oil liquid not dissolved or adsorbed.
- B. AST Rule 62-762.451(3) requires that **Reporting** of the following **Discharges** or discharge indications be made (to the FDEP/County/LP) on **Discharge Reporting Form (DRF)** [Form 62-761.900(1)], **within 24 hours or** before the close of the County's next business day:
1. tests of surface water or groundwater indicating the presence of petroleum-related contamination,
 2. floating oil or fuel or a visible sheen,
 3. A spill or overfill onto soil or another pervious surface, equal to or exceeding 25 gallons,
 4. analytical or field tests of soil indicating the presence of petroleum "contamination" (i.e., concentrations above the criteria in FAC 62-777), unless due to a spill or overfill of less than 25 gallons,
 5. Oil or fuel staining on soils, or,
 6. Any result of an "Incident" investigation which indicates that a *discharge* has occurred.

- C. While the above *tank system* rule exempts certain spills **under 25** gallons from reporting requirements, the separate **rule chapter for site cleanup** has additional conditions for that exemption. For example, cleanup Rule FAC 62-780.201(1) requires **Reporting** of **any** such **Discharge** (i.e., *any* spilling, leaking, etc.) **unless** such discharge to pervious surface is under a rule-specified threshold and cleaned up fully and quickly, as specified in the cleanup rule of FAC 62-780.560(1).
- D. Cleanup Rule **62-780.201(1)** requires that **Reporting** of the following **Discharges** be made to the FDEP/County/LP [Local Program]:
1. **Any discharge to surface water** shall be reported as soon as possible and within 24 hours or the next County business day (ASAP/24-hr).
 2. Discharge **greater than or equal to 25 gallons** on a **pervious surface** (such as grass, dirt, soil) (ASAP/24-hr).
 3. Discharge **less than 25 gallons** on a **pervious surface**, and **NOT cleaned up** according to FAC 62-780.560(1), shall be reported **within one week** of discovery.
 4. **Reports** shall be:
 - a. Verbally reported to the State Watch Office, and
 - b. submitted on the FDEP's **Discharge Reporting Form (DRF)** [Form 62-761.900(1)] to the FDEP Office of Emergency Response.
- E. **Cleanup Rule 62-780.201(1)** exempts from reporting:
1. Discharge **less than 25 gallons**, on a **pervious surface** (such as soil), that are **cleaned up** (completely and quickly), according to FAC 62-780.560(1).

4.4 DISPOSAL OF RECOVERED MATERIALS [112.7(A)(3)(V)]

S-K currently processes used oils, oil-soaked rags, and other related oil-impacted waste as part of their business. All oil-soaked material generated by S-K is properly processed and disposed of by S-K. In the event of an oil discharge at the S-K Facility, oil will be recovered using granular absorbent and oil absorbent materials found in the spill kits described in Section 6.1. Recovered material associated with large spills will be handled and disposed by SWS.

4.5 FACILITY RESPONSE PLAN [112.20]

A Facility Response Plan (FRP) is a plan for responding, to the maximum extent practicable, to a worst-case discharge of oil, or to a substantial threat of such a discharge. An FRP also covers response to smaller discharges. However, an FRP is required only for a non-transportation-related onshore facility that, because of its location, could reasonably be expected to cause substantial harm to the environment by discharging oil into or on the navigable waters or adjoining shorelines. As documented in Section 1.4, this S-K Facility does not meet the substantial harm criteria and, therefore, does not require an FRP.

5. POTENTIAL DISCHARGE PREDICTIONS [112.7(B)]

Table 5 presents the potential discharge predictions for the S-K Facility. Because of the facility's containment systems, alternative equivalent measures, and BMPs, there is not a reasonable potential for a major equipment failure to result in a discharge to **surface waters**.

Nonetheless, in the event of a discharge that escapes any secondary containment, a spill kit will be available, which will include absorbent material, socks, pigs, and pads. Vacuum trucks and other resources would also be mobilized to control and remove larger spills.

If a discharge were to escape the secondary containment units, except those of the off-site railcar area, the oil would be contained within the onsite retention ponds. The onsite retention ponds are not equipped with discharge or overflow devices that discharge off-site or to surface water bodies. Per Table 5, the retention ponds have the capacity to contain the predicted potential discharge quantities.

Should a spill occur in the railcar loading area and overflow its containment structures and track pans, the spill would not flow to the S-K Facility retention ponds. Instead, the spill would spread along the swale-like depression formed along either side of the railroad tracks, within the railroad right-of-way (ROW). The railroad spur appears to terminate approx. 600 ft to the southeast. The railway continues to the northwest toward apparently higher elevations, which would impede flow of a spill or runoff in that direction. This railroad ROW swale provides a linear flow conveyance and/or retention feature. Control measures could be placed across it, such as dirt berms, to prevent oil from flowing farther. Such trapped oil could percolate into the swale. Calculations indicate that if the oil flowed from the railcar area down the swale in a flow of a mere 6 inches in average depth, across a combined 10-foot-wide path (both sides of track), the entire volume from a railcar (max. 30,000 gallons) would go no farther than 800 feet. In actuality, percolation along the way and wider spreading is expected to significantly reduce that potential length of spread. The adjacent properties and road ROWs appear to be at higher elevations. These features would also impede the flow of such a spill.

Table 5 begins on the next page. It is followed by **Table 5.B**, which provides similar information for oil-containing equipment. These are required to be listed but do not constitute "bulk storage containers", and their oil volume does not count toward the total oil storage capacity of the facility.

Table 5. Potential Discharge Predictions

Source	Location	Largest Container Volume	Discharge Rate	Drains into 2y Cont.	2y Cont. Volume	2y Cont. Fully contains?	If 2y overflows, flows to:	3y Area Containt. Volume	3y Cont. Fully contains?	Potential Tank		
Tank Nos.	Area	(gallons)	(gal/hr)	Area	(gallons)	Yes, No?	3y Area	(gallons)	Yes, No?	Rupture	Loading Un-L.	Fire, Explosion
1 - 16	MTFSA	30,000	30,000	MTFSA	209,000	Yes	S.Ret.Pond	454,000	Yes	X	X	X
17 - 19, 56	STFA (central)	20,000	20,000	STFA (centr	51,000	Yes	S.Ret.Pond	454,000	Yes	X	X	X
20, 21, 22, 23	NTF	20,000	20,000	NTF	55,000	Yes	N.Ret.Pond	50,000	Yes	X	X	X
24 - 31	SNFTA	30,000	30,000	SNFTA	74,000	Yes	S.Ret.Pond	454,000	Yes	X	X	X
32 - 49	WB-PADC	13,000	13,000	WB-PADC	22,000	Yes	S.Ret.Pond	454,000	Yes	X	X	X
53	UO-IWW-SA	159,000	159,000	UO-IWW-SA	156,000	No	S.Ret.Pond	454,000	Yes	X	X	X
50, 51, 52	KO-SA	2,000	2,000	KO-SA	2,150	Yes	N.Ret.Pond	50,000	Yes	X	X	X
Rail car loading area	RR LA	30,000	30,000	RR LA	19,000	No	RR ROW Swale	See Note "3" below.	Yes	X	X	X
East Loading Area	ELA	8,100	8,100	ELA	0	No	N.Ret.Pond	50,000	Yes	X	X	X
West Loading Area	WLA	8,100	8,100	WLA	1,500	No	Trench, Sump Pump to STFA	51,000	Yes	X	X	X
West Loading Area	WLA	8,100	8,100	WLA	0	No	If not pumped into STFA, then overflows to S.Ret.Pond	454,000	Yes	X	X	X
Totes, Drums	WB-FP	330	330	WB-FP	18,000	Yes	S.Ret.Pond	454,000	Yes	X		X
Maintenace Products	Cabinets in WB-PADC or WB-FP	3	3	Cabinets in WB-PADC or WB-FP	5	Yes	WB-FP	20,850	Yes	X	X	X
Oil in Electrical Transformer	Electrical Transformer	500	500	Electrical Transformer	0	No	S.Ret.Pond	454,000	Yes	X		X
Oil in Air Compressors	WB-PADC & WB-FP	2	2	WB-PADC & WB-FP	18,000	Yes	N.Ret.Pond	50,000	Yes	X		X

NOTES:

2y = Secondary Containment

3y = Tertiary Containment, or location to which overflow from the 2y Containment would flow.

~~53~~ = Tank not in service or removed. Volume not counted towards total.

1. ELA - East Loading Area has a grated pipe trench that may be used for some capture, depending on spill point.

2. ELA and WLA: Max. Tank Vol. = total vol. of trucked tanker.

3. If Rail Car loading area overflows its Track Pans and Containments:

Overflow estimate= Exces Volume x Safety Factor of 1.2 = 13,200 gallons = 1,765 CF

If spreads in RR RWO Swale equivalent to 10 ft-wide x 6 inches avg. depth (= 0.5 ft-deep),

then uncontained overflow would run approx. 353 Linear Feet along the swale, not counting losses due to percolation.

If ENTIRE RR Car contents overflowed: 802 Linear Feet along the swale, not counting losses due to percolation.

For reference in viewing the USGS map, the south and north borders of the facility are approx. 500 ft long.

See additional discussion / evaluation in SPCC plan.

Source: ECT, S-K, 2012. S-K, Landmark Solutions, 2017.

Table 5 (continued). Potential Discharge Predictions

Table 5.B. from Oil-containing Equipment
(Electrical, Operating, or Mechanical)
 (exempt from various SPCC requirements)

Source	Type of Failure	Largest Container Volume (gal.)	Flow Direction	Containment volume (gal)
Power utility Transformer (electrical equipment)	<500	Mineral Oil	Leakage would flow to surrounding ground.	To the ground adjacent to the transformer, then South Retention Pond (>450,000 gal)
Air Compressors (3)	1.5	Hydraulic Oil	Floor of Warehouse Building, within entrance containment curbs.	WB and curbs contain up to 18,000 gal. If overflows that, then to the North retention pond, 50,000 gal.

6. DISCHARGE PREVENTION MEASURES, CONTROLS, AND COUNTERMEASURES

6.1 CONTAINMENT SYSTEMS AND DIVERSIONARY STRUCTURES AND EQUIPMENT [112.7(C)]

To prevent discharges of oil to navigable waterways, S-K has provided appropriate secondary containment for bulk storage containers and discharge prevention equipment capable of containing oil prior to cleanup. S-K maintains several oil-only spill kits and a supply of granular absorbent in the vicinity of each of the oil product storage areas, in case of an accidental discharge. The **oil-only spill equipment** is composed of the following equipment:

- Over-pack spill drum with lid and ring;
- Absorbent granular material;
- Absorbent pads;
- Absorbent rolls; and,
- Disposable bags and ties.

Secondary containment structures are discussed in Sections 6.6.1, 6.10.2, and 6.10.11.

6.2 CONTINGENCY PLANNING [112.7(D)]

As described in Sections 6.1, 6.6.1, 6.10.2, and 6.10.11, S-K has provided adequate secondary containment structures and discharge response procedures and equipment. Therefore, this section is not applicable.

6.3 INSPECTIONS, TESTS, AND RECORDS [112.7(E)]

1. Formal facility visual inspections will be conducted weekly.
2. Records of these inspections will be documented and signed by the inspector or the Director of Facilities.
3. During the inspections, all storage tanks, piping, valves, transfer equipment, containment systems, and spill response equipment will be checked thoroughly for discharges and integrity.
4. Any discrepancies noted during the inspections will be corrected as soon as practical to prevent the discharge of oil.

A sample inspection form is provided in **Appendix C**. Completed inspection forms will be maintained with the Plan in Appendix C for a minimum of **three years**.

6.4 PERSONNEL, TRAINING, AND DISCHARGE PREVENTION PROCEDURES [112.7(F)]

6.4.1 PERSONNEL TRAINING [112.7(F)(1)]

All S-K personnel that handle oil and that are involved with handling of oil products will be instructed on the following:

- discharge prevention procedures,
- the actions to take in the event of a discharge,
- the use of discharge response equipment,
- applicable regulations pertaining to oil discharges,
- general facility operations, and
- the contents of this Plan.

This instruction will occur within a reasonable time after implementation of this Plan for current employees and shortly after new hires begin work.

Records of employee training will be maintained in **Appendix D** or other S-K employee record-keeping system for at least three (3) years.

6.4.2 DESIGNATED PERSON ACCOUNTABLE FOR DISCHARGE PREVENTION [112.7(F)(2)]

Mr. Darwin “Troy” Robinson, Terminal Manager, is the **Facility Response Coordinator** and is the designated person accountable for discharge prevention at this facility.

6.4.3 DISCHARGE PREVENTION BRIEFINGS [112.7(F)(3)]

All personnel that handle oil-filled equipment or oil containers will take part in discharge prevention briefings at least once a year to ensure adequate understanding of the Plan. Topics will include known discharges, failures, malfunctioning components, and any recently developed precautionary measures. Additionally, these briefings will serve as refreshers for the training described in Section 6.4.1. Sign-in sheets, which include the topics of discussion at each meeting, will be maintained in **Appendix E** or other S-K employee record-keeping system for at least 3 years.

6.5 SECURITY [112.7(G)]

6.5.1 FENCING [112.7(G)(1)]

Building doors and bulk oil storage systems are secured when the building is unattended. Additionally, the entirety of the S-K facility property, with the exception of the rail car area, is secured with a 6 foot high chain-link fence. Once the rail car loading activity is completed, the car is sealed and considered to be under the authority of the Florida Department of Transportation or railway owner/authority. No loaded rail cars are kept at the facility during facility unmanned periods (i.e., Friday through Sunday and holidays).

6.5.2 VALVES [112.7(G)(2)]

The only valves that could permit flow are the used oil tank loading and unloading valves. These valves are manually operated, precluding accidental release. Personnel are trained in proper tank loading and unloading procedures to prevent spills. Site security measures prevent access to these valves by unauthorized personnel. Rail car valves are also properly secured when not in use.

6.5.3 PUMPS [112.7(G)(3)]

Electric-powered pumps are used to transfer oil from containers and to empty all containment areas of accumulated storm water. When not in use, the pumps are set in the off position and de-energized. Personnel are trained in the proper use of the transfer pumps. The security gate around the facility prevents access to these pumps by unauthorized personnel. Visual monitoring further prevents overflows.

6.5.4 PIPING [112.7(G)(4)]

Piping present at the facility consists of aboveground piping used to transfer oil to/from the process area (i.e., Warehouse Building) to the tank farm area and to/from the rail car unloading area. The security gate around the facility prevents unauthorized access to this piping. No underground piping is used at the S-K facility.

6.5.5 LIGHTING [112.7(G)(5)]

Exterior and interior lighting at the facility and rail car area is sufficient for the discovery of discharges from the oil storage and dispensing systems and to discourage acts of vandalism.

6.6 FACILITY TANK CAR AND TANK TRUCK LOADING / UNLOADING RACK [112.7(H)(1), (2), (3), (4)]

Refer to **Tables 4 and 5** for containment volumes and potential spill capture predictions.

The **rail car** loading or unloading area is located along the northern portion of the facility. The area is equipped with a secondary containment unit capable of containing an estimated 19,000 gallons (not counting the containment of the new offloading pump system). This secondary containment area is also equipped with a baffle system which helps capture any discharge from the top opening of the rail car during loading activities. Due to the length limitation associated with the secondary containment area, no more than four loaded rail cars are kept within the rail car loading area. Additionally, facility personnel are instructed to make sure all rail cars are completely situated within the extent of containment area before transferring the oil.

The **west tank truck loading area** is equipped with a secondary containment spill interceptor trench, shown on Figures 2 and 3. The trench is equipped with a sump and pump to transfer captured spillage into one of the ASTs in the concrete secondary containment, or, as a backup, even directly into the secondary containments there (SFTA: 51,000 gallons, SNFTA: 74,000 gallons). Additionally, in the event of secondary containment failure, discharge oil would drain

by overland flow into the southern retention pond. The southern retention pond is not constructed with any outlets or overflow devices.

The east tank truck loading area drains into the northern and southern retention ponds. The northern retention pond is also not constructed with any outlets or overflow devices.

Please note that in addition to the provided secondary containment, the risk of a discharge is low due to properly implemented best management practices (BMPs) as described below.

6.6.1 BEST MANAGEMENT PRACTICES (BMPS)

The following BMPs are implemented for all oil product/waste loading/unloading operations:

1. Prior to commencing the loading or unloading operation, a trained S-K employee and driver will be present to visually inspect and monitor the operation. This employee and the truck driver, as applicable, will have been trained in the use of spill cleanup, spill response and notification procedures, and the mechanical equipment used to transfer or pump oil at the facility. S-K procedures require that at least one person must be within 25 feet of the vehicle while loading/unloading.
2. Prior to commencing the loading or unloading operation, the rail car/tank truck will be immobilized as described in Section 6.6.2.
3. For rail cars, the trained S-K employee will confirm the entirety of the rail car to be loaded is positioned within the extent of the containment area and the top opening of the rail car positioned within the side containment baffle.
4. The S-K employee must verify the contents of the product being transferred and check the available capacity of the container receiving the load and make sure there is sufficient volume for the expected load.
5. The S-K employee and driver will inspect all hoses, fittings, connectors, and pump equipment prior to use. Any equipment found to be unsafe or unserviceable will be replace or repaired before transfer operations can commence.
6. The driver and S-K employee will be present throughout the entire loading or unloading operation. Both the S-K employee and the driver will monitor the transfer operation to detect any discharges and to prevent overfilling of either the storage tank or the tank truck.
7. In the event of a discharge, the driver of the truck or the S-K employee, will cease transfer operations and inform, the Facility Response Coordinator and/or response personnel immediately. The driver and appropriate S-K personnel will respond to the discharge as described in Section 4.2.

8. Prior to tank truck departure, the driver and S-K employee will collect product from drains and hoses, clean up any incidental discharges, and inspect the tank truck for leaks, as described in Section 6.6.3.

**6.6.2 WARNING LIGHT OR PHYSICAL BARRIER SYSTEM [40 CFR
112.7(H)(2)]**

To prevent the tank truck from departing before complete disconnection of the transfer line, the driver will:

- place the truck into first gear,
- set the parking brake,
- chock the wheels before commencing the transfer of oil,
- and then re-inspect for full disconnection and valve shutoffs prior to departure.

Prior to rail car loading/unloading, the rail car must be chocked and the blue caution flag posted on the rail before loading commences.

**6.6.3 INSPECTION OF LOWER MOST DRAINAGE OUTLETS [40 CFR
112.7(H)(3)]**

Prior to tank truck/rail car departure, the driver and S-K employee will inspect all drain outlets on the rail car/truck. If necessary, the outlets are tightened, adjusted, or replaced to prevent the discharge of oil while the vehicle is on site or during transit.

6.7 BRITTLE FRACTURE EVALUATION [112.7(I)]

The one remaining 159,000 gallon field erected used oil tank will stay in “Out of Service” status and eventually be removed from the facility. Consequently, the tank will not need to be evaluated by a qualified inspector for risk of discharge or failure due to brittle fracture or other catastrophe. Therefore, this section is not applicable.

6.8 STATE DISCHARGE PREVENTION REQUIREMENTS [112.7(J)]

Florida has state regulations dealing with discharge prevention aboveground storage tanks. These are defined in Chapter 62-761 and 62-762, F.A.C. S-K complies with those rules and is inspected by the State/County tanks compliance program.

6.9 FACILITY DRAINAGE [112.8(B)]

6.9.1 DRAINAGE FROM DIKED STORAGE AREAS [112.8(B)(1)]

Draining of accumulated storm water is performed manually through the use of portable electric pumps.

Any accumulated storm water will be visually inspected for any evidence of oil contamination (e.g., sheen, smell, etc.) prior to discharge. If any sign of oil contamination is observed, the oil

will be pumped into the industrial wastewater storage tank. If, upon inspection, there is no evidence of oil contamination, the containment area will be discharged to grade. Inspection of accumulated storm water will only be conducted by trained personnel.

Records for secondary containment drainage events will be kept with this SPCC Plan for a period of 5 years (**Appendix F**).

6.9.2 VALVES FOR THE DRAINAGE OF DIKED AREAS [112.8(B)(2)]

None of the secondary containment units are equipped with drainage valves.

6.9.3 DRAINAGE SYSTEMS FROM UNDIKED AREAS [112.8(B)(3)]

Drainage from areas that are outside of secondary containment (i.e. "undiked areas") with a potential for a discharge of oil due to operations at the site, include the tank truck loading/unloading areas. Drainage from any of these areas flows into either of the onsite retention ponds. The retention ponds are not equipped with any outlet or overflow structures. The undiked perimeter of the west tank truck loading area is surrounded by a spill capture or interceptor trench. This is equipped with a sump that can be used to pump any spillage into a storage tank in the main tank farm. In addition, the potential for a discharge in these areas will be managed by closely scrutinized BMPs during all oil loading and unloading operations that occur in these areas.

6.9.4 DIVERSION SYSTEM FOR FINAL DISCHARGE [112.8(B)(4)]

Through the means discussed in Section 6.9.3, the undiked areas at the facility will drain into either of the onsite retention ponds. The retention ponds are not equipped with any outlet or overflow structures.

6.9.5 FACILITY DRAINAGE SYSTEMS AND EQUIPMENT [112.8(B)(5)]

S-K has no direct treatment system for its drainage waters. Facility personnel are instructed to pump any "impacted" storm water into the S-K process train for proper treatment. All process tanks and associated equipment are equipped with secondary containment system.

6.10 BULK STORAGE CONTAINERS [112.8(C)]

Pursuant to 40 CFR 112.2, the containers at the site that meet the definition of "bulk storage containers" include those noted in Table 3-1.

6.10.1 CONTAINER COMPATIBILITY WITH CONTENTS AND STORAGE CONDITIONS [112.8(C)(1)]

All containers storing oil at the S-K Facility are constructed of materials that are compatible with their respective oils.

6.10.2 SECONDARY CONTAINMENT [112.8(C)(2)]

Secondary containment as defined in 112.2 and/or an alternative containment system is provided for each bulk storage container, as follows:

As presented in Section 3, **Table 4** provides the calculations and estimated volumes of the various major spill containments at the facility, and **Table 5** evaluates the potential spill from each tank area, the secondary containment volume available to capture, remaining freeboard for precipitation, and any tertiary containment, should the secondary one overflow.

6.10.3 DRAINAGE OF UNCONTAMINATED RAINWATER FROM DIKED
AREAS [112.8(C)(3)]

See section 6.9.1.

6.10.4 CORROSION PROTECTION OF COMPLETELY BURIED METALLIC
STORAGE TANKS [112.8(C)(4)]

There are no completely buried metallic storage tanks at the facility. Therefore, this section is not applicable.

6.10.5 CORROSION PROTECTION OF PARTIALLY BURIED OR
BUNKERED METALLIC TANKS [112.8(C)(5)]

There are no partially buried or bunkered metallic tanks at the facility. Therefore, this section is not applicable.

6.10.6 ABOVEGROUND TANK PERIODIC INTEGRITY TESTING
[112.8(C)(6)]

The one remaining 159,000-gallon, **field-erected**, used-oil tank will remain in “Out of Service” status and eventually be removed from the facility. Consequently, the tank will not need to undergo certified integrity testing.

The field erected containers are to be integrity tested periodically and whenever material repairs are made. Integrity testing will at least include the visual inspection of the tanks by a qualified inspector. Based on industry standards (i.e., API Standard 653) these inspections will be conducted every 10 to 20 years throughout the life of the tanks or as required by Chapter 62-762, F.A.C.

Integrity testing of **shop-fabricated** bulk storage tanks will not be required for the following reasons:

- Internal corrosion poses minimal risk of failure.
- Each container is inspected at least monthly.
- All sides of each container are visible (i.e., the container, or the secondary containment, has no contact with the ground).
- So a release from any tank bottom onto its underlying pavement would be visible during the inspections.

- All the containers are on pavement (concrete), so none have direct contact with bare ground or soil.
- If/when corrosion of steel tanks is noted, the facility contracts qualified contractors to empty, inspect, and service or maintain the tank surfaces and coating.

Records of the inspections will be kept in **Appendix C** or in appropriate S-K facility records for at least three years.

6.10.7 LEAKAGE THROUGH DEFECTIVE INTERNAL HEATING COILS
[112.8(C)(7)]

No container at the S-K Facility has internal heating coils. Therefore, this section is not applicable.

6.10.8 GOOD ENGINEERING PRACTICE OF CONTAINERS [112.8(C)(8)]

All bulk containers are equipped with either an audible alarm and pump cutoff device or side level indicator. These liquid level sensing devices are tested annually to ensure proper operation.

When oil handling operations associated with the tanks equipped with side level indicators are being conducted, at least one S-K employee will be present to monitor the liquid level and the overall filling process in order to avoid a potential discharge of oil.

Any S-K employee monitoring the loading activity will be required to be in direct communication with the pump operator.

6.10.9 OBSERVATION OF EFFLUENT TREATMENT FACILITIES
[112.8(C)(9)]

There are no effluent treatment facilities at the facility. Therefore, this section is not applicable.

6.10.10 CORRECTION OF VISIBLE DISCHARGES [112.8(C)(10)]

The bulk oil storage appurtenances at the facility will be visually inspected weekly (refer to Section 6.3). If any discharges are noted during the inspection, they will be cleaned up promptly, reported if/as required, and the cause of the release will be corrected to prevent future discharges.

6.10.11 POSITION OF MOBILE OR PORTABLE OIL STORAGE
CONTAINERS [112.8(C)(11)]

Portable oil storage containers consist of the 55-gallon drums, oil filter bins, and smaller miscellaneous-use oil product containers. All of these portable oil product storage containers are kept in an upright position and within their respective designated storage area. In the event of a spill, any spilled material is immediately cleaned up and disposed of accordingly as required by the law.

6.11 FACILITY TRANSFER OPERATIONS, PUMPING, AND FACILITY PROCESS [112.8(D)]

Oil transfer operations occur between the tanker trucks delivering and hauling petroleum to and from the facility. All oil transfer operations are manned to minimize the likelihood of a spill.

6.11.1 PROTECTION OF BURIED PIPING [112.8(D)(1)]

There is no buried piping at the facility. Therefore, this section is not applicable.

6.11.2 TERMINAL CONNECTIONS [112.8(D)(2)]

There are no terminal piping connections at the facility. Therefore, this section is not applicable.

6.11.3 DESIGN OF PIPE SUPPORTS [112.8(D)(3)]

All pipe supports associated with aboveground piping has been designed to minimize abrasion and corrosion and to accommodate expansion and contraction without damage.

6.11.4 INSPECTION OF ABOVEGROUND VALVES, PIPING, AND APPURTENANCES [112.8(D)(4)]

The piping used to transfer product from the rail car/tank truck to and from the facility is inspected visually prior to each use (refer to Section 6.3). The general condition of the piping and pump will be assessed, and each examined for leakage potential. If any component is found to be in poor condition or leaking, it will be taken out of service and repaired or replaced as soon as practical.

6.11.5 PROTECTION OF ABOVEGROUND PIPING AND OTHER TRANSFER OPERATIONS FROM VEHICULAR TRAFFIC [112.8(D)(5)]

All the aboveground piping is located overhead away from normal vehicular traffic. Some pipe bridges support overhead piping above truck driveways within the facility. These pipe supports provide ample vertical clearance above truck heights.

7. SPCC IMPLEMENTATION

This section identifies the areas where implementation of the requirements of 40 CFR 112 is needed at the S-K Facility. Currently, S-K complies fully with 40 CFR Part 112; therefore, no issues must be addressed and/or implemented immediately.

APPENDIX A

ADMINISTRATIVE UPDATES

ADMINISTRATIVE UPDATES

Administrative updates to the Plan do not require certification by a registered Professional Engineer. Such certification is only required for a change that materially affects the facility's potential for a discharge of oil. Changes in information such as names, addresses, and phone numbers do not require the certification of a Professional Engineer (refer to Section 2.1.3). When administrative updates are made to the Plan, update the table below, indicating what was changed and which pages were affected.

Date	Updated by	Page(s) Affected	Reason(s) for Update(s)
02/07/2017	FJA for DTR	Contacts, in Section 3.1, 4.1.1.	Personnel changes.
12/03/2021	ML for JC	Contacts, in Section 3.1, 4.1.1.	Personnel changes

Table A-1. SPCC Plan Periodic Reviews Requiring Amendment

I have reviewed and evaluated the SPCC Plan for the S-K, Ocala, FL facility on the date listed below and **will amend** the Plan as a result.

No.	Signature	Date
1	F.J. "Paco" Amram, P.E. , Landmark Solutions LLC, in collaboration with 3Leaf Solutions LLC	02-07-2017
2		
3		

Table A-2. SPCC Plan Periodic Reviews not Requiring Amendment

I have reviewed and evaluated the SPCC Plan for S-K, Ocala, FL facility on the date listed below and will **not amend** the Plan as a result.

No.	Signature	Date
1		
2		
3		

APPENDIX B

DISCHARGE REPORTS

APPENDIX B—DISCHARGE REPORTS

SAFETY-KLEEN FACILITY DISCHARGE REPORT

Facility Name:	Safety-Kleen Ocala Facility		
Facility Phone Number:	(352) 687-0688		
Facility Address:	359 Cypress Road, Ocala, Florida 34472		
Largest Oil Storage Container:	<u>159,000-gallons</u>	Normal Daily Oil Throughput:	<u>Varies</u>
Facility Description:	<u>Oil processing facility</u>		

Incident Type **Evacuation Required?**_____

_____ Discharge to water that exceeds 1,000-gallons

_____ Two discharges to water that exceed 42-gallons each within 12-month period

_____ Discharge to water that violates applicable water quality standards

_____ Discharge to water that causes a sheen upon or discoloration of water surface

_____ Discharge to water that causes a sludge or emulsion to form beneath water surface

Incident Source and Location: _____

Incident Date: _____ **Weather Conditions:** _____

Approximate Time Incident Began: _____ **Discovered:** _____ **Ended:** _____

Material Discharged: _____ **Concentration of Discharge:** _____

Total Quantity Discharged: _____ gallons **Qty. Discharged to Navigable Waters:** _____ gallons

Affected Media: _____

Transportation Characteristics of Media into Which Material Discharged: _____

Person Possessing or Controlling Material at Time of Discharge: _____

Address: _____ **Phone Number:** _____

Person Having Actual Knowledge of Facts Surrounding Discharge: _____

Address: _____ **Phone Number:** _____

Person to Contact for Additional Information Concerning Discharge: _____

Address: _____ **Phone Number:** _____

SAFETY-KLEEN OCALA FACILITY DISCHARGE REPORT (Cont'd.)**Cause of Discharge, Including Failure Analysis:** _____

Efforts Taken to Control or Mitigate Discharge: _____

Harmful Effects of Discharge, if Known: _____

Damages or Injuries Caused by Discharge: _____

Corrective Actions and Countermeasures Taken, Including Equipment Repairs and Replacements: _____

Measures Taken or Planned to Reduce Possibility of Recurrence: _____

Present or Proposed Remedial Action at Site of Discharge: _____

Individuals and/or Organizations Contacted: _____

Prepared by: _____ **Title:** _____**Signature:** _____ **Date:** _____



Discharge Report Form

PLEASE PRINT OR TYPE

DEP Form # 62-761.900(1)

Form Title Discharge Report Form

Effective Date: July 13, 1998

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

1. Facility ID Number (if registered): _____ 2. Date of form completion: _____

3. General information

Facility name or responsible party (if applicable): _____

Facility Owner or Operator, or Discharger: _____

Contact Person: _____ Telephone Number: () _____ County: _____

Facility or Discharger Mailing Address: _____

Location of Discharge (street address): _____

Latitude and Longitude of Discharge (if known) _____

4. Date of receipt of test results or

discovery of confirmed discharge: _____ month/day/year

5. Estimated number of gallons

discharged: _____

6. Discharge affected: ☐ Air ☐ Soil ☐ Groundwater ☐ Drinking water well(s) ☐ Shoreline ☐ Surface water (water body name) _____

7. Method of discovery (check all that apply)

<input type="checkbox"/> Liquid detector (automatic or manual)	<input type="checkbox"/> Internal inspection	<input type="checkbox"/> Closure/Closure Assessment
<input type="checkbox"/> Vapor detector (automatic or manual)	<input type="checkbox"/> Inventory control	<input type="checkbox"/> Groundwater analytical samples
<input type="checkbox"/> Tightness test	<input type="checkbox"/> Monitoring wells	<input type="checkbox"/> Soil analytical tests or samples
<input type="checkbox"/> Pressure test	<input type="checkbox"/> Automatic tank gauging	<input type="checkbox"/> Visual observation
<input type="checkbox"/> Statistical Inventory Reconciliation	<input type="checkbox"/> Manual tank gauging	<input type="checkbox"/> Other _____

8. Type of regulated substance discharged: (check one)

<input type="checkbox"/> Unknown	<input type="checkbox"/> Used/waste oil	<input type="checkbox"/> Jet fuel	<input type="checkbox"/> Heating oil	<input type="checkbox"/> New/lube oil
<input type="checkbox"/> Gasoline	<input type="checkbox"/> Aviation gas	<input type="checkbox"/> Diesel	<input type="checkbox"/> Kerosene	<input type="checkbox"/> Mineral acid
<input type="checkbox"/> Hazardous substance - includes CERCLA substances from USTs above reportable quantities, pesticides, ammonia, chlorine, and derivatives (write in name or Chemical Abstract Service (CAS) number) _____				
<input type="checkbox"/> Other _____				

9. Source of Discharge: (check all that apply)

<input type="checkbox"/> Dispensing system	<input type="checkbox"/> Pipe	<input type="checkbox"/> Barge	<input type="checkbox"/> Pipeline	<input type="checkbox"/> Vehicle
<input type="checkbox"/> Tank	<input type="checkbox"/> Fitting	<input type="checkbox"/> Tanker ship	<input type="checkbox"/> Railroad tankcar	<input type="checkbox"/> Airplane
<input type="checkbox"/> Unknown	<input type="checkbox"/> Valve failure	<input type="checkbox"/> Other Vessel	<input type="checkbox"/> Tank truck	<input type="checkbox"/> Drum
<input type="checkbox"/> Other _____				

10. Cause of the discharge: (check all that apply)

<input type="checkbox"/> Loose connection	<input type="checkbox"/> Puncture	<input type="checkbox"/> Spill	<input type="checkbox"/> Collision	<input type="checkbox"/> Corrosion
<input type="checkbox"/> Fire/explosion	<input type="checkbox"/> Overfill	<input type="checkbox"/> Human error	<input type="checkbox"/> Vehicle Accident	<input type="checkbox"/> Installation failure
<input type="checkbox"/> Other _____				

11. Actions taken in response to the discharge: _____

12. Comments: _____

13. Agencies notified (as applicable):

<input type="checkbox"/> State Warning Point 1-800 320-0519	<input type="checkbox"/> National Response Center 1-800-424-8802	<input type="checkbox"/> Florida Marine Patrol (800) 342-5367	<input type="checkbox"/> Fire Department.	<input type="checkbox"/> DEP (district/person) <input type="checkbox"/> County Tanks Program
--	---	--	---	---

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

Printed Name of Owner, Operator or Authorized Representative,
or Discharger

Signature of Owner, Operator or Authorized Representative,
or Discharger

Oil spills to navigable waters of the United States, and releases of reportable quantities of CERCLA hazardous substances must be reported within one hour to the National Response Center or the Florida Marine Patrol. Reports to the National Response Center of oil spills to navigable waters need not be repeated to any other federal, state, or local agency. Conditions at the site that do not involve spills to navigable waters of the United States, or CERCLA hazardous substances, that pose an immediate threat to human health or the environment, must be immediately reported to the State Warning Point or the Local Fire Department. This form must be submitted for all discharges from facilities with storage tank systems, and at other sites, in accordance with Chapters 62-761 and 62-770, F.A.C. Chapter 62-761 and 62-770, F.A.C., should be consulted for specific reporting requirements.

***State Warning Point
1-800-320-0519***

***National Response Center
1-(800)-424-8802***

***Local Fire Department
(obtain local number)***

This form must be used to report any confirmed discharge, or any one of the following from a storage tank system subject to Chapter 62-761, F.A.C., unless the discharge is from a previously-known and reported discharge:

1. Results of **analytical or field tests** of surface water, groundwater, or soils **indicating** the presence of **contamination** by:
 - a. A hazardous substance from a UST;
 - b. A regulated substance, other than petroleum products; or
 - c. Petroleum products' chemicals of concern specified in Chapter 62-770, F.A.C.;
2. A **spill or overfill** event of a regulated substance **to soil equal to or exceeding 25 gallons**, **unless** the regulated substance has a more stringent reporting requirement specified in CFR Title 40, Part 302;
3. **Free product or sheen** of a regulated substance present in surface water, groundwater, soils, basements, sewers, and utility lines at the facility or in the surrounding area; or
4. **Soils stained** by regulated substances observed during a closure assessment performed in accordance with Rule 62-761.800, F.A.C.

A copy of this form must be delivered or faxed to the County **within 24 hours of the discovery of a discharge, **or before the close of the next business day**. It is recommended that the original copy be sent in the mail. If the discharge occurs at a county-owned facility, a copy of the form must be faxed or delivered to the local FDEP District office. A discharge of petroleum or petroleum products from a source other than a regulated storage tank system must be reported within one week of discovery in accordance with Rule 62-770.250, F.A.C.**

FDEP District Office Addresses:

Northwest District
160 Governmental Center
Pensacola FL. 32501-5794
Phone: 850-595-8360
FAX: 850-595-8417

Northeast District
7825 Baymeadows Way Suite B 200
Jacksonville FL. 32256-7590
Phone: 904-448-4300
FAX: 904-448-4362

Central District
3319 Maguire Blvd. Suite 232
Orlando, FL. 32803-3767
Phone: 407-894-7555
FAX: 407-897-2966

Southwest District
3804 Coconut Palm Dr.
Tampa FL. 33619-8218
Phone: 813-744-6100
FAX: 813-744-6125

South District
2295 Victoria Ave. Suite 364
Ft. Myers FL. 33901-2549
Phone: 813-332-6975
FAX: 813-332-6969

Southeast District
400 N. Congress Ave.
West Palm Beach, FL. 33416-5425
Phone: 561-681-6600
FAX: 561-681-6790

[Effective date of the rule]



Incident Notification Form

PLEASE PRINT OR TYPE

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

DEP Form # 62-761.900(6)

Form Title Incident Notification Form

Effective Date: July 13, 1998

1. Facility ID Number (if registered): _____ 2. Date of form completion: _____

3. General information

Facility name: _____
Facility Owner or Operator: _____
Contact Person: _____ Telephone number: () _____ County: _____
Facility mailing address: _____
Location of incident (facility street address): _____
Latitude and Longitude of incident (If known.) _____

4. Date of Discovery of incident: _____ month/day/year

5. Monitoring method that indicates a possible release or an incident: (check all that apply)

- | | | |
|--|---|---|
| <input type="checkbox"/> Liquid detector (automatic or manual) | <input type="checkbox"/> Groundwater samples | <input type="checkbox"/> Closure |
| <input type="checkbox"/> Vapor detector (automatic or manual) | <input type="checkbox"/> Monitoring wells | <input type="checkbox"/> Inventory control |
| <input type="checkbox"/> Tightness test | <input type="checkbox"/> Internal inspection | <input type="checkbox"/> Statistical Inventory Reconciliation |
| <input type="checkbox"/> Pressure test | <input type="checkbox"/> Odors in the vicinity | <input type="checkbox"/> Groundwater analytical samples |
| <input type="checkbox"/> Breach of integrity test | <input type="checkbox"/> Automatic tank gauging | <input type="checkbox"/> Soil analytical tests or samples |
| <input type="checkbox"/> Visual observation | <input type="checkbox"/> Manual tank gauging | <input type="checkbox"/> Other _____ |

6. Type of regulated substance stored in the storage system: (check one)

- | | | |
|--------------------------------------|---|---------------------------------------|
| <input type="checkbox"/> Diesel | <input type="checkbox"/> Used/waste oil | <input type="checkbox"/> New/lube oil |
| <input type="checkbox"/> Gasoline | <input type="checkbox"/> Aviation gas | <input type="checkbox"/> Kerosene |
| <input type="checkbox"/> Heating oil | <input type="checkbox"/> Jet fuel | <input type="checkbox"/> Other _____ |
- ☐ Hazardous substance - includes CERCLA substances, pesticides, ammonia, chlorine, and their derivatives, and mineral acids.
(write in name or Chemical Abstract Service (CAS) number) _____

7. Incident involves or originated from a: (check all that apply)

- | | | | | |
|---|---|--|--------------------------------|---|
| <input type="checkbox"/> Tank | <input type="checkbox"/> Unusual operating conditions | <input type="checkbox"/> Dispensing equipment | <input type="checkbox"/> Pipe | <input type="checkbox"/> Overfill protection device |
| <input type="checkbox"/> Piping sump | <input type="checkbox"/> Release detection equipment | <input type="checkbox"/> Secondary containment system | <input type="checkbox"/> Other | <input type="checkbox"/> Dispenser Liners |
| <input type="checkbox"/> Loss of >100 gallons to an impervious surface other than secondary containment | | <input type="checkbox"/> Loss of >500 gallons within secondary containment | | |

8. Cause of the incident, if known: (check all that apply)

- | | | | |
|---|--|---|--------------------------------------|
| <input type="checkbox"/> Overfill (<25 gallons) | <input type="checkbox"/> Spill (<25 gallons) | <input type="checkbox"/> Theft | <input type="checkbox"/> Corrosion |
| <input type="checkbox"/> Faulty Probe or sensor | <input type="checkbox"/> Human error | <input type="checkbox"/> Installation failure | <input type="checkbox"/> Other _____ |

9. Actions taken in response to the incident: _____

10. Comments: _____

11. Agencies notified (as applicable):

- | | | |
|---|--|--|
| <input type="checkbox"/> Fire Department. | <input type="checkbox"/> Local Program | <input type="checkbox"/> DEP (district/person) |
|---|--|--|

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

Printed Name of Owner, Operator or Authorized Representative

Signature of Owner, Operator or Authorized Representative.

Instructions for completing the Incident Notification Form

This form must be completed to notify the County of all incidents, or of the following suspected releases:

1. A failed or inconclusive tightness, pressure, or breach of integrity test,
2. Internal inspection results, including perforations, corrosion holes, weld failures, or other similar defects that indicate that a release has occurred.
3. Unusual operating conditions such as the erratic behavior of product dispensing equipment, the sudden loss of product from the storage tank system, or any unexplained presence of water in the tank, unless system equipment is found to be defective but not leaking;
4. Odors of a regulated substance in surface or groundwater, soils, basements, sewers and utility lines at the facility or in the surrounding area;
5. The loss of a regulated substance from a storage tank system exceeding **100 gallons on impervious surfaces** other than secondary containment, driveways, airport runways, or other similar asphalt or concrete surfaces;
6. The loss of a regulated substance exceeding **500 gallons inside a dike field area with secondary containment**; and
7. A positive response of release detection devices or methods described in Rule 62-761.610, F.A.C., or approved under Rule 62-761.850, F.A.C. A positive response shall be the indication of a release of regulated substances, an exceedance of the Release Detection Response Level or a breach of integrity of a storage tank system.

*If the investigation of an incident indicates that **a discharge did not occur** (for example, the investigation shows that the situation was the result of a theft or a malfunctioning electronic release detection probe), then a letter of **retraction** should be sent to the County **within fourteen days** with documentation that verifies that a discharge did not occur. If **within 24 hours** of an incident, or before the close of the County's next business day, the investigation of the incident **does not confirm that a discharge has occurred**, an Incident Report Form need **not be submitted**.*

A copy of this form must be delivered or faxed to the County within 24 hours of the discovery of an incident, or before the close of the next business day. It is recommended that the original copy be sent in the mail. If the incident occurs at a county-owned facility, a copy of the form must be faxed or delivered to the local DEP District office.

DEP District Office Addresses:

Northwest District
160 Governmental Center
Pensacola FL. 32501-5794
Phone: 850-595-8360
FAX: 850-595-8417

Northeast District
7825 Baymeadows Way Suite B 200
Jacksonville FL. 32256-7590
Phone: 904-488-4300
FAX: 904-488-4366

Central District
3319 Maguire Blvd. Suite 232
Orlando, FL. 32803-3767
Phone: 407-894-7555
FAX: 407-897-2966

Southwest District
3804 Coconut Palm Dr.
Tampa FL. 33619-8218
Phone: 813-744-6100
FAX: 813-744-6125

South District
2295 Victoria Ave. Suite 364
Ft. Myers FL. 33901-2549
Phone: 813-332-6975
FAX: 813-332-6969

Southeast District
400 N. Congress Ave., 3rd Floor
West Palm Beach, FL. 33401
Phone: 561-681-6600
FAX: 561-681-6755

(02/01/98)

APPENDIX C

INSPECTION RECORDS

APPENDIX C—INSPECTION RECORDS**SAFETY-KLEEN OCALA FACILITY VISUAL INSPECTION RECORD**

Inspector(s): _____

Address:
 359 Cypress Road
 Ocala, Florida 34472

Date of Inspection: _____

Location	Inspection Items	Yes	No	N/A	Comments
Main tank farm Tanks (1 through 16)	Tank Shell				
	Secondary Containment				
	Valves				
	Piping				
	Evidence of Spills				
South tank farm Tanks (17 through 19, 57)	Tank Shell				
	Secondary Containment				
	Valves				
	Piping				
	Evidence of Spills				
North tank farm Tanks (21 through 23)	Tank Shell				
	Secondary Containment				
	Valves				
	Piping				
	Evidence of Spills				
Southern tank farm (Tanks 24 through 31)	Tank Shell				
	Secondary Containment				
	Valves				
	Piping				
	Evidence of Spills				
Process warehouse (Tanks 32 through 49,	Tank Shell				
	Valves				
	Piping				
	Evidence of Spills				
	Spill Kit				
Used oil tank farm (Tanks 53 through 54)	Tank Shell				
	Secondary Containment				
	Valves				
	Piping				
	Evidence of Spills				

Location	Inspection Items	Yes	No	N/A	Comments
Knockout tank farm (Tanks 50 through 52)	Tank Shell				
	Secondary Containment				
	Valves				
	Piping				
	Evidence of Spills				
Drummed used oil product area	Condition of Drums				
	Evidence of Spills				
	Condition of Drums				
Rail car load- ing/unloading area	Secondary Containment				
	Valves				
	Spill Kit				
	Evidence of Spills				
Used oil tanks load- ing/unloading area	Secondary Containment				
	Valves				
	Spill Kit				
	Evidence of Spills				
Eastern load- ing/unloading area	Secondary Containment				
	Valves				
	Spill Kit				
	Evidence of Spills				
Western load- ing/unloading area	Secondary Containment				
	Valves				
	Spill Kit				
	Evidence of Spills				
Northern retention pond	Accumulated Storm Water				
	Evidence of Spills				
	Signs of Erosion				
Southern retention pond	Accumulated Storm Water				
	Evidence of Spills				
	Signs of Erosion				

Additional Comments: _____

APPENDIX D

PERSONNEL TRAINING RECORDS

SAFETY-KLEEN OCALA FACILITY PERSONNEL TRAINING RECORD

Date: _____

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APPENDIX E

DISCHARGE PREVENTION BRIEFING RECORDS

APPENDIX E—DISCHARGE PREVENTION BRIEFING RECORDS

Address:
359 Cypress Road
Ocala, Florida 34472

Course Title: _____

Instructor: _____

Date: _____

Attendees		
Signature	Printed Name	
Topics Covered		

APPENDIX F

SECONDARY CONTAINMENT DRAINAGE RECORDS

APPENDIX F—SECONDARY CONTAINMENT DRAINAGE RECORDS**SAFETY-KLEEN OCALA FACILITY SECONDARY CONTAINMENT DRAINAGE RECORD**

Date of Event: _____

Person Responsible for Draining Containment: _____

Secondary Containment Area	Evidence of Oil Contamination?		Estimated Volume (Gallons)	Comments
	Yes	No		

Attachment H

Contingency Plan

CONTINGENCY PLAN

For:

**Safety-Kleen Systems, Inc.
359 Cypress Road
Ocala, Marion County, Florida 34472**

EPA Generator I.D. No. FLR 000 060 301



Updated by:

3Leaf Solutions, LLC

PO Box 270474
Tampa, Florida 33688
(813) 494 5263, FAX (813) 464 7794
www.3leafsolutions.com
DBarcenas@3LeafSolutions.com

And

Landmark Solutions, LLC

F.J. "Paco" Amram, P.E., LEED AP
Principal Engineer
813-503-6319 cell / text
Paco@LandmarkSolutions.US
State of Florida Engineering Business
Certificate Number 30955

Revised:

December 2021

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APPENDICES

APPENDIX A 40 CFR 279.52

TABLES

TABLE 1. ADMINISTRATIVE UPDATES

FIGURES

FIGURE 1. SITE MAP

FIGURE 2. EVACUATION PLAN

1. CONTINGENCY PLAN PURPOSE, IMPLEMENTATION WITH SPCC PLAN, AND REVISION
[40 CFR 279.52 (b) (i)]

The Safety-Kleen Systems, Inc. (S-K) Ocala facility Contingency Plan (Contingency Plan) was designed to minimize hazards to human health or the environment from fires, explosions, or any unplanned sudden or non-sudden release of used oil to air, soil, or surface water. ***This plan shall be implemented whenever there is a fire, explosion, or release of used oil which could threaten human health or the environment.***

This plan has been written as an addendum to the facility's existing Spill Prevention, Control and Countermeasures Plan (SPCC), developed in compliance to 40 CFR Part 112.

Both the Contingency Plan and the SPCC plan contain complimentary procedures that must be followed in the event of an emergency incident covered under this regulation. The SPCC must be referenced for specific inspection forms, logs and notification procedures referred to within the Contingency Plan.

The **Emergency Coordinator (EC)** of this Plan shall refer to the SPCC for specific notification protocols that must be followed in the event of an unplanned sudden or non-sudden release.

The Contingency Plan has been developed and implemented in accordance to the regulatory requirements specified at 40 CFR 279.52, *General Facility Standards*. This Plan is subject to immediate mandatory revisions in the case that any of the following events occur:

- Failure of the Plan in an emergency;
- Changes to the S-K Ocala facility in its design, construction, or operation and maintenance in a way that materially increases the potential for fires, explosions, or releases of oil, or changes the response necessary in an emergency;
- Changes in the EC, or
- Changes in the List of Emergency Equipment.

Revisions to the Contingency Plan are documented below:

Table 1. Contingency Plan Administrative Updates

No.	By	Date	Description
0	F.J. "Paco" Amram, P.E.	February 9, 2017	5-year update
1	Michelle Lackman	December 3, 2021	Administrative

2. ARRANGEMENTS MADE WITH LOCAL AUTHORITIES
[40 CFR 279.52 (b)(2)(iii)]

Copies of the Contingency Plan have been provided to the following agencies/regulatory authorities:

Marion County Fire Rescue

2122 Pine Road
Ocala, FL 34472
(352) 291-8000 or 911

Marion County Sheriff's Department

501 Water Road
Ocala, FL 34472
(352) 402-6000 or 911

Munroe Regional Medical Center

1500 SW 1st Avenue
Ocala, FL 34471
(352) 351-7200 or 911

3. LISTING OF QUALIFIED EMERGENCY COORDINATORS
[40 CFR 279.52 (b)(2)(iv)]

Primary Emergency Coordinator (EC)

Wanda Hutchinson

Terminal Manager

(also its SPCC Facility Response Coordinator, FRC)

Office: (352) 537-3071

Mobile: (352) 480-7828

Fax: (352) 687-8511

Home Cell: (352) 476-4125

Home Address: 3240 SW 34th Street, Apt 802
Ocala, FL 34474

Secondary Emergency Coordinator (EC):

Joseph Ventry

Operator Manager

Office: 352-537-3073

Mobile: 352-425-4520

Home Cell: 352-266-2206

Home Address: 2337 NE 12 Ct.
Ocala, FL 34470

4. EVACUATION PLAN AND PROCEDURE **[40 CFR 279.52 (b)(2)(vi)]**

4.1 EVACUATION

In the event of an emergency, evacuation from the facility may be necessary. **Figure 2**, illustrates the general evacuation flow and muster point (meeting location to account for all personnel) that will be followed if a facility evacuation is ordered as part of the response.

4.2 FACILITY SIGNALS AND COMMUNICATION

There is no public address system at the Ocala facility. All S-K facility staff are equipped with 2-way VHF radios for inter-plant communication.

The EC shall communicate with the administration staff by cellular phone or 2-way VHF radios in the event of an emergency.

The EC shall be responsible for directing a safe and orderly evacuation of all onsite staff and visitors to the muster point, shown on **Figure 2**.

The EC or his/her assignee will be responsible for taking a roll/headcount of all evacuees, to ensure that all staff, visitors and contractors have been accounted for.

If any occupant is not accounted for, the EC or his/her assignee shall immediately notify emergency personnel and ensure that actions are coordinated and started immediately to locate that person(s).

5. LISTING OF AVAILABLE EMERGENCY EQUIPMENT
[40 CFR 279.52 (b)(2)(v)]

To prevent and/or mitigate spills of oil, S-K has provided emergency equipment for containing oil discharge prior to its cleanup and for fire extinguishing.

S-K maintains several **oil-only spill kits** and a supply of granular absorbent in the vicinity of each of the four main oil processing or storage areas, for response to an accidental discharge. **Figure 2 of the SPCC Plan** shows the kit locations.

Each **spill kit** is composed of the following equipment:

- One pair of protective gloves;
- Over-pack spill drum with lid and ring;
- Absorbent granular material;
- Absorbent pads;
- Absorbent rolls; and
- Disposable bags and ties.

S-K has installed **fire extinguishers** throughout the processing facility and administration building. These are routinely inspected by Piper Fire Protection Services. Fire extinguisher locations are visible throughout the facility and are also marked by signs.

The processing facility and warehouse facility are also equipped with **overhead fire sprinklers**.

6. EMERGENCY PROCEDURES [40 CFR 279.52(b)(6)]

6.1 PURPOSE AND OVERVIEW

This section describes the specific steps that will be followed in the event of an imminent or actual emergency situation at the Ocala facility. The procedures are written so as to demonstrate compliance to 40 CFR 279.52(b)(6). Specific procedures have been developed to address the following scenarios:

- *Fires;*
- *Explosions, and*
- *Unplanned sudden or non-sudden releases of oil to air, soil, or surface water at the facility.*

6.2 IMMEDIATE NOTIFICATION of EMERGENCY

Whenever there is an imminent or actual emergency situation, the primary or secondary emergency coordinator shall immediately:

- (A) Activate internal facility alarms or communication systems, where applicable, to notify all facility personnel; and
- (B) Notify appropriate state or local agencies with designated response roles if their help is needed.

6.3 INITIAL EMERGENCY CHARACTERIZATION

Whenever there is a release, fire, or explosion, the Emergency Coordinator (EC) will immediately identify:

- the character,
- exact source,
- amount, and
- a real extent of any released materials.

This may be accomplished by observation or review of facility records or manifests and, if necessary, by chemical analyses.

Concurrently, the EC will assess possible hazards to human health or the environment that may result from the release, fire, or explosion. This assessment must consider:

- both direct and indirect effects of the release, fire, or explosion
- (e.g., the effects of any toxic, irritating, or asphyxiating gases that are generated,
- or the effects of any hazardous surface water run-offs from water or chemical agents used to control fire and heat-induced explosions).

6.4 EMERGENCY that can AFFECT PEOPLE or ENVIRONMENT OUTSIDE of the FACILITY

If the EC determines that the facility has had a release, fire, or explosion which could threaten human health, or the environment, **outside the facility**, he must report his findings as follows:

- A. If **evacuation of local area may be advisable**, based on the assessment, the S-K EC will **immediately notify** the following appropriate local authorities:

Agency	Contact Number
State of Florida Department of Environmental Protection (FDEP) (Central District)	407-897-4100
State Warning Point	850-413-9911 800-320-0519
State Emergency Response Commission	800-635-7179
Alachua County Health Department, Storage Tank Program Office (regulates tanks in Marion County)	352-264-6800

- B. The EC shall remain onsite as necessary and be available **to help** appropriate officials **decide whether local areas should be evacuated**.
- C. The EC shall also be responsible for notifying either the government official designated as the on-scene coordinator for the geographical area, **OR** the **National Response Center** (using their 24-hour toll free number **800-424-8802**).
- D. The S-K EC report must include the following information to the **National Response Center**:
- (1) Name and telephone number of reporter;
 - (2) Name and address of facility;
 - (3) Time and type of incident (e.g., release, fire);
 - (4) Name and quantity of material(s) involved, to the extent known;
 - (5) The extent of injuries, if any; and
 - (6) The **possible hazards** to human health, or the environment, **outside the S-K Ocala facility**.

6.5 FIRE RESPONSE PROCEDURE

In case of fire, any employee is to perform the following:

1. Dial 911: Use the nearest telephone and dial 911 to call the fire department.
2. Activate the nearest fire pull box if one is available.
3. Notify everyone in the immediate area verbally that there is a fire and instruct them to evacuate the area according to the primary/secondary evacuation routes to the muster point;
4. If you have received proper fire extinguisher training, and are confident that you can control the fire in its incipient stage, located the closest fire extinguisher, attempt to extinguish the fire, and notify other person(s) by radio or voice that you are doing so.
5. If uncertain or untrained on fire extinguisher use, immediately evacuate the area, and go to the muster point.
6. **Do not attempt to use a fire extinguisher if you are unsure of your ability to control the fire. Leave the immediate area! Always give priority to protecting human life, which cannot be replaced, over property.**
7. Notify the facility EC or Secondary Emergency Coordinator (SEC) and follow their instructions.
8. Provide the EC with any information you may have about the nature of the fire emergency.

6.6 EXPLOSION RESPONSE PROCEDURE

In the event of an explosion:

1. Dial 911: Use the nearest telephone and dial 911 to call the fire department.
2. Activate the nearest fire pull box if one is available.
3. Do not enter any rooms, structures or areas that may appear to be damaged or compromised as a result of the explosion.
4. Scan the area for any fellow workers or visitors, and instruct them to evacuate to the evacuation muster point.

5. Visually survey the immediate area for any fires that may have been initiated from the explosion. **Do not enter** any areas, structures or locations that appear to have been structurally weakened or affected by the explosion.
6. If you have received proper fire extinguisher training, and are confident that you can control an incipient fire, locate the closest fire extinguisher, attempt to extinguish the fire, and notify other person(s) by radio or voice that you are doing so.
7. *If uncertain or untrained on fire extinguisher use, immediately evacuate the area, and go to the muster point.*
8. **Do not attempt to use a fire extinguisher if you are unsure of your ability to fully extinguish the fire. Leave the immediate area!**
5. Notify everyone in the immediate area verbally that there is a fire or explosion and instruct them to evacuate the affected area according to the primary/secondary evacuation routes to the muster point.
6. Notify the facility EC or Secondary Emergency Coordinator and follow their instructions.
7. From a safe location, assist the EC by sharing any information or observations you may have made about the facility and explosion.

6.7 RESPONSE to UNPLANNED RELEASES of OIL to AIR, SOIL, or SURFACE WATER

In the event of an unplanned release:

1. If there is a fire associated with the release, activate a fire alarm pull box.
2. If there is NO fire associated with the release, do NOT activate a fire alarm.
3. Promptly notify any personnel in the immediate area of the release to evacuate the area to the muster point.
4. Evacuate the area.
5. Go to the nearest safe location with a phone. Notify the SK EC.
6. Depending on the nature of the release, the EC or his designee may provide you with further instructions.
7. The EC will be responsible for making all local, regional and federal notifications that may be required for a sudden or non-sudden release. **Specific notification procedures** to be followed are referenced in the facility's **Spill Prevention Control and Countermeasures (SPCC) Plan**, Section 4.0 Discharge Response. Specifically, SPCC Section 4.3. outlines specific oral and written notification requirements.

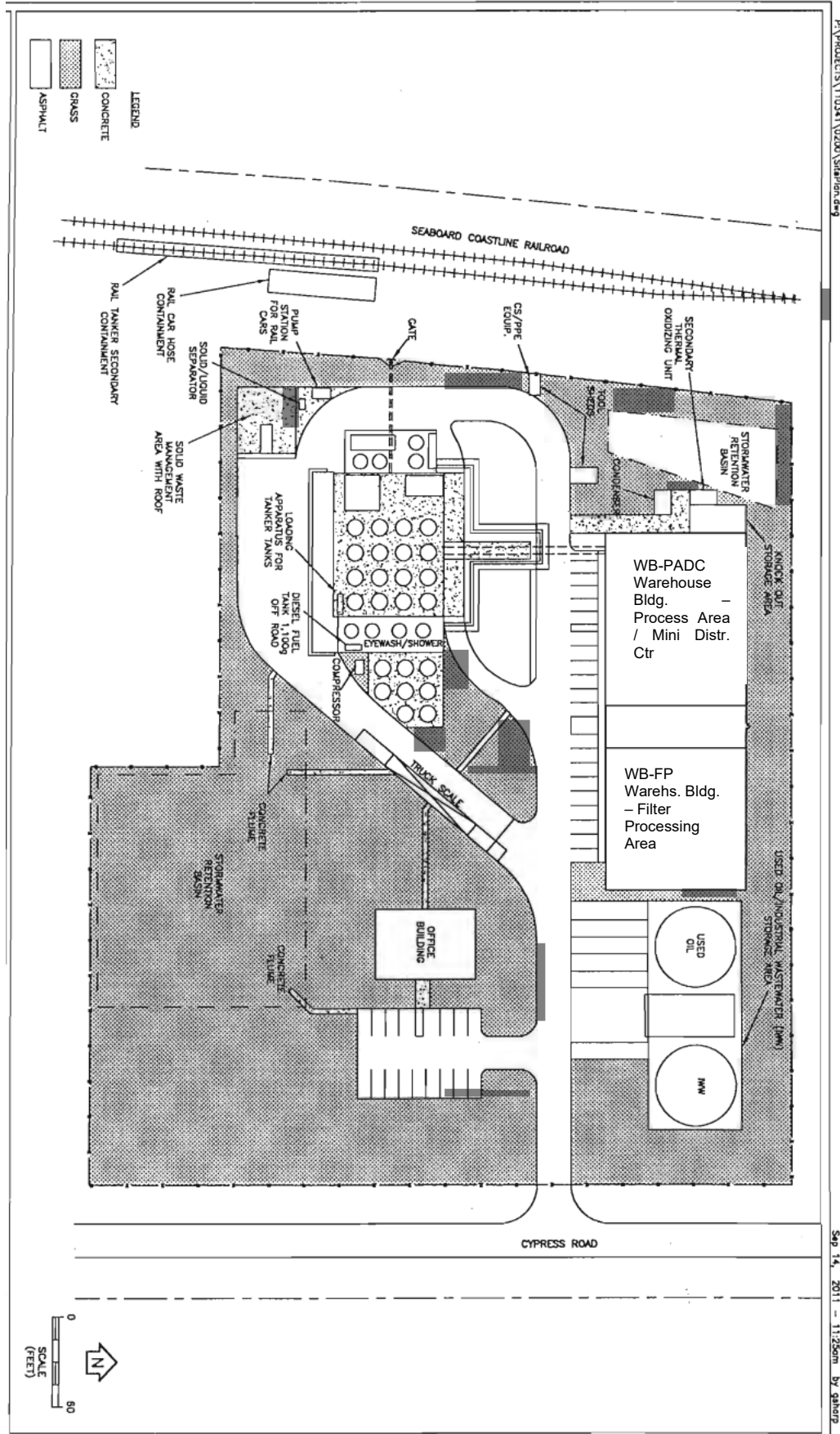
7. ADDITIONAL RESPONSE MEASURES [40 CFR 279.52(b)(6)(v)]

1. **During the emergency**, the S-K EC or his/her designee will also take all reasonable **measures** necessary to ensure that fires, explosions, and releases do not occur, recur, or spread to other used oil or regulated/hazardous waste at the facility. These measures may include:
 - Suspending/stopping processes and normal facility operations;
 - Collecting and containing released used oil; and
 - Removing or isolating containers.
2. As personnel safety permits, the EC or his/her designee will monitor for leaks, pressure build-up, gas generation, or ruptures in valves, pipes, or other equipment at all appropriate areas.
3. Immediately after an emergency, the S-K EC will **coordinate the necessary recycling, storing, or disposing** of recovered used oil, contaminated soil or surface water, or any other material that results from a release, fire, or explosion at the facility, as may be required.
4. After the emergency event, S-K management will **notify the Regional Administrator, and state and local authorities** that the facility complies with paragraphs (b)(6)(viii)(A) and (B) of this section before operations are resumed in the affected area(s) of the facility. [Please refer to **Appendix A** for a copy of 40 CFR 279.52].
5. That notification must be completed ***before operations are resumed*** in the affected area(s) of the facility.
6. The EC must make **note in the operating records**, of the time, date and details of ***any facility incident*** requiring the implementation of this contingency plan.

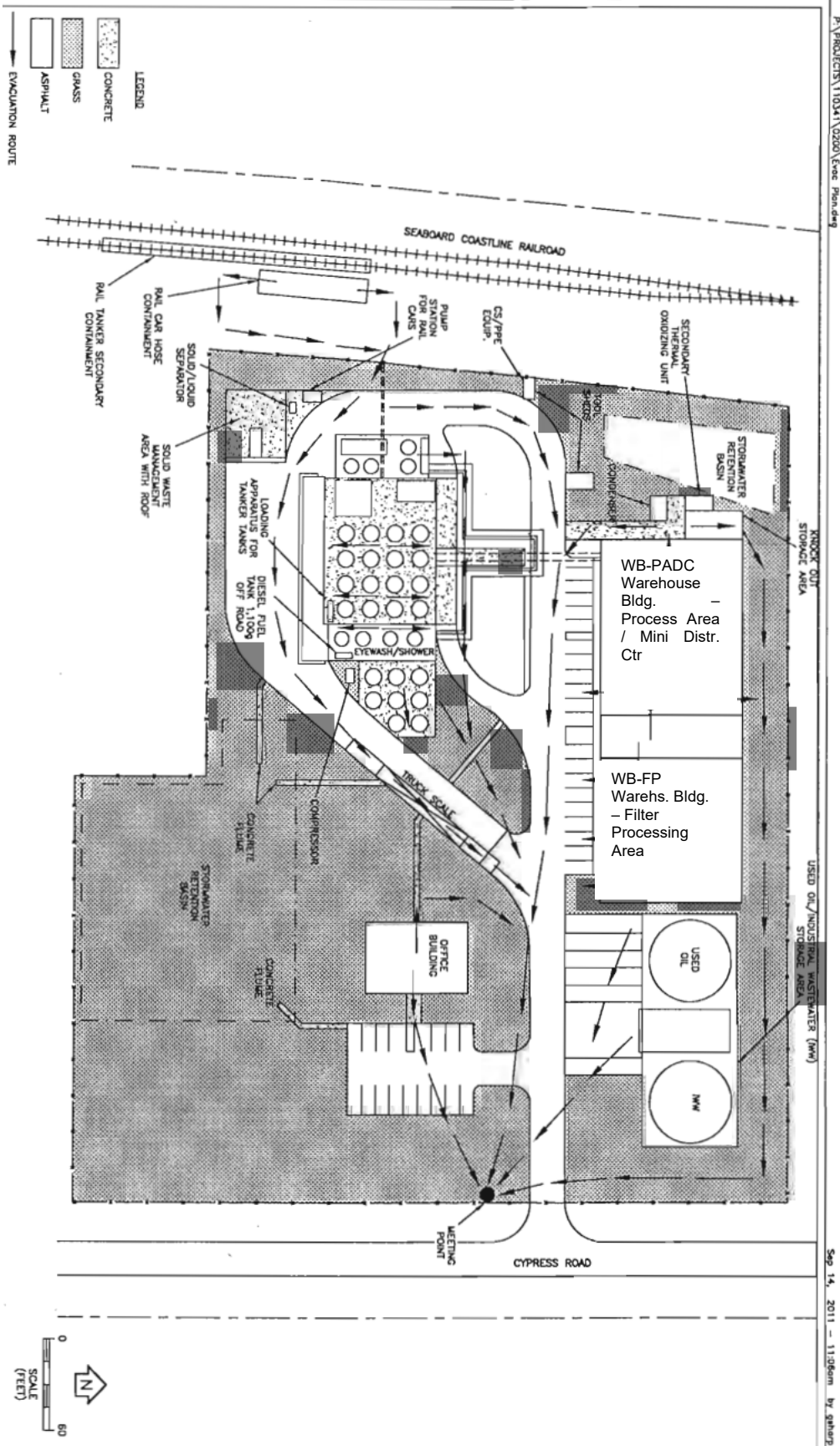
CONTINGENCY PLAN

FIGURES

CONTINGENCY PLAN - Figure 1. Site Map



CONTINGENCY PLAN - Figure 2. Evacuation Plan



CONTINGENCY PLAN

APPENDIX A

40 CRF 279.5

Attachment I

Unit Management Plan

A. UNIT MANAGEMENT PLAN DESCRIPTIONS

STORAGE TANKS

All tanks and/or containers implemented for used oil storage within the S-K facility meet the requirements of 40 CFR Parts 264 and 265 as applicable. All secondary containment systems meet the requirements of 40 CFR Part 279.45. All tanks and/or containers utilized for used oil storage, industrial wastewater storage, dehydrated oil, marine diesel oil and virgin diesel fuel are clearly labeled accordingly. S-K addresses any spill, leak or other discharge as described within the facility Spill Prevention, Control and Countermeasure (SPCC) Plan (See Attachment G)

FACILITY STANDARDS

S-K maintains an internal communications system consisting of telephones, cellular phones, audible alarms and electrical alarms. Fire extinguishers (portable type) are located within the control booth and at various locations throughout the facility. All facility equipment is tested and/or inspected regularly. Copies of inspection/testing documentation are provided in the SPCC Plan. The facility is maintained by S-K personnel to ensure adequate space for the unobstructed movement of spill response personnel and equipment. All local authorities have received a copy of the facility SPCC Plan. The local authorities will be provided copies of the updated plan at the conclusion of the permit renewal process. S-K will clean close the facility as per 40 CFR Part 265 Subparts G and J. S-K is in compliance with RCRA Section 3010.

TANK FARM CONTAINMENT CALCULATIONS

The secondary containment volume calculations for the five tank farm areas were provided in a previous application dated July 26, 2006, and remain the same. The overall secondary containment system capacity has been calculated to take in to account the additions at the north (one addition) and south ends (two additional areas) of the Main Tank Farm Storage Area (MTFSA). Calculations for the Industrial Wastewater Storage Area are also provided, as referenced in the July 26, 2006 application.

STORAGE TANK REGISTRATION

All storage tanks at the S-K Ocala facility are above ground. The above ground storage tanks (ASTs) at the facility requiring registration per Chapter 62-762, F.A.C. are registered with the Florida Department of Environmental Protection.

STRUCTURAL INTEGRITY

The structural integrity of the storage tanks, processing piping and process meet the performance standards for new storage tank systems in F.A.C. 62-762.501.

STORAGE CAPACITIES

The storage areas operated by S-K are separated into five specific areas for bulk storage in tanks and container storage. The Main Tank Farm Storage Area (MTFSA) has six tanks for bulk storage of used oil, recycled fuel oil, and marine diesel fuel. The remaining tanks are for the storage and distribution of product re-refined oil grades and blended lubricants. Two additional tank receiving areas were constructed in 2001-2002. The two additional storage tank areas were constructed north and south of the existing MTFSA. The construction was similar to the existing MTFSA. The area of the North Tank Farm (NTF) is approximately 1,890 square feet (ft²). The area of the South Tank Farm (STFA) is approximately 1,800 ft².

The North and South Tank Farm secondary containment areas are connected to the MTFSA. A second area south of the Tank Farm (TM) was constructed in 2004. The Southern Tank Farm Area (SNTFA) is approximately 2,448 ft² in size. The South Tank Farm has three tanks, each with a capacity of 20,000 gallons, for receiving industrial wastewater (#17-19). The South Tank Farm (STFA) also has a stormwater tank (#56) (14,100 gal.), and an off-road diesel fuel (1,100 gal.) tank (#57) which is no longer in service.

The North Tank Farm (NTF) has two tanks for receiving industrial wastewater each with 20,000 gallon capacity (#20-21), one tank for storage of used antifreeze with 20,000 gallon capacity (#22), one tank for storage of product antifreeze with 20,000 gallon capacity (#23), and one 500 gallon tank for storage of off-road diesel (#55). The Southern Tank Farm Area (SNTFA) has eight tanks, each with a capacity of 30,000 gallons. The tanks are numbered (#24-31). The UOIWWSA has one 159,000 gallon aboveground storage tank (#53) that is not in service and is scheduled for removal at a yet to be determined date. Safety-Kleen will notify the Department at the time of removal. UOIWWSA has a loading/unloading area.

The MTFSA secondary containment area has an effective capacity of approximately 158,280 gallons, which is sufficient to contain the volume of the largest tank. The South Tank Farm has a secondary containment capacity of 40,074.3 gallons. The North Tank Farm has a secondary containment capacity of 34,509 gallons. The Southern Tank Farm Area has a secondary containment capacity of 45,616.7 gallons. The combined tank

farm containment areas have a capacity of 278,480.0 gallons. The loading/unloading areas on the east and west side of the tank farm have a secondary containment capacity of approximately 342 gallons and 4,950 gallons respectively. The west loading/unloading area has a trench secondary containment system that brings its total capacity to 6,068.5 gallons.

B. SAFETY-KLEEN OCALA UNIT MANAGEMENT PLAN

The UOIWWSA has a secondary containment capacity of 188,266.5 gallons. The UOIWWSA Bulk Petroleum Storage Area loading/unloading area has a secondary containment capacity of 9,931 gallons. The drum and container storage area is located in the south end of the warehouse. The types of waste stored in the drum and container storage area include used oil, used oil filters, used absorbent materials, sludge, and petroleum contaminated soil. Petroleum contact water will not be stored in the drum or container storage area. Waste will be stored in U.S. Department of Transportation (USDOT) authorized drums/containers. The shipping containers may be “roll-off” boxes (15, 20, or 40 cubic yard [yd³]), dump trailers, or drums (5, 10, 15, 55, or 85-gallon). The container storage area has a secondary containment capacity of approximately 24,248 gallons. The container storage area is divided into areas to allow the storage of 420 55-gallon drums (23,100 gallons), 24 chemical product 55-gallon drums (1,320 gallons), five 475-gallon totes (2,375 gallons), and three 40-yd³ roll-off boxes (24,240 gallons). Adequate aisle space is maintained between rows of containers. The containers are inspected weekly to ensure the containers are in good condition and are not leaking using the CO Management Inspection Form. The Processing Area is located in the north end of the warehouse building. The secondary containment capacity is 32,340 gallons and the largest tank is 13,000 gallons. The Knockout Tank Area has a secondary containment capacity of 2,652-gallons after a new 6-inch containment curb was added. The volume of the largest tank in the Knockout Tank Area is 2,000 gallons. The Rail Tanker Loading/Unloading Facility Secondary Containment holds 27,117.9 gallons. The maximum rail tanker capacity that can be currently operated at the facility is 25,000 gallons.

SOLID WASTE MANAGEMENT AREA (SWMA)

A solid waste management area for the solidification of solid waste is located at the Northwest corner of the facility (See Figure A3). An area within the solidification unit is used to place a roll-off box for the accumulation of processed solid waste. Two access points are provided for trucks to unload unprocessed

solid waste on either side of the roll-off box. The solidification area has a roof, containment walls and curb. The solid waste solidification area has a containment capacity of 21,024 gallons. Containerized solid waste is stored in the drum storage area inside the south end of the warehouse. It is then moved to the SWMA for processing (solidification). The SWMA is equipped with a concrete floor that is coated with a two-part epoxy coating.

INSPECTIONS

The enclosed CO Oil Terminal and CO Management Inspection Forms (Attachment I-1) are used to complete monthly inspections of the tank systems and the associated piping and containment areas and weekly container storage areas.

Attachment I-1

Inspection Form



CO Management Inspection (No PCB Section)

Form Code: 905

Landlord Header	
Inspector Name	
Area of Inspection	
Inspection Date and Time	
CO Management Inspection Instructions	
Instructions: Note condition of inspection items. If item does not apply to an area, mark N/A. All unsatisfactory findings must be explained below. Include any repairs, changes or other remedial actions required or performed.	
Container Storage Areas	
The housekeeping meets Clean Harbors standards. [Clean floors, clean walls, no trash, clean equipment, tools in proper storage locations, no odors or spills]	
There are no visible stains in the containment or other plant areas.	
The containers do not have waste/staining on the outside which would require cleaning or over-packing	
The Containers are in good condition, (not crushed, pinched or damaged), properly closed, with legible labels that are facing the aisle.	
Containers are stored in an organized fashion that allows for easy inspection; aisle space meets regulatory/permit requirements, and is clear and free of obstructions	
The containers have labels that are completed properly with no missing information (i.e. accumulation start date, hazard identification, etc.)	
There are no cracks or gaps in containment that need to be caulked/sealed. Any areas of older cracks that have been previously repaired are	

still in good condition.	
If concrete is sealed, sealant is in good condition with no cracks, gaps or areas needing repairs.	
Any sumps in containment are empty and clean.	
Satellite or accumulation containers are properly marked and closed.	
There are no observed safety issues (trips/slips/fall hazards, damaged equipment).	
Tanks	
Housekeeping meets Clean Harbors' standards.. There is no debris, plant matter, accumulated rain water or other material accumulated within containment.	
There are no visible stains in the containment area.	
Any small containers within the containment are properly marked and closed (unless adding or removing material).	
Sumps are clean and empty.	
If the tanks store hazardous waste they are marked with the words Hazardous Waste, have a NFPA diamond and appropriate "confined space" markings at entrances, and any other registration or permit required markings.	
If the tanks are out of service, they are marked with the words Out of Service and properly documented in the WIN tank management system.	
Satellite or accumulation containers are properly marked and closed.	
Level indicators are functional and do not indicate any potential overflow condition.	
All tanks are documented in the WIN tank management system.	

There are no observed safety issues.	
Process Areas	
Process areas are free of heavy residues (accumulated solids, sludges or other process residues) that indicate a spill or equipment leak has occurred.	
Satellite or accumulation containers are labeled properly and remain closed.	
No visible staining on floors	
Housekeeping meets Clean Harbors' standards.	
There are no observed safety issues.	
Yard/General	
There are no incoming loads sitting in the yard that exceed the allowed time limit.	
There are no outgoing loads sitting in the yard for more than the allowed time limit (10 days in most cases).	
Trucks in staging or storage areas containing hazardous waste have the manifest attached to the truck or in close proximity.	
Truck landing gear is supported and is not sinking into the ground.	
There are no visible stains on the surfaces outside the facility.	
There are no vehicles parked in the yard that are leaking.	
Housekeeping meets Clean Harbors' standards.	
Facility signage is in good order and legible, including all required perimeter signs.	
Security fencing is not damaged or compromised; gates are closed and locked when facility is not manned, or if required to be closed and locked due to permit conditions during normal operations.	
Security cameras (if required) are operational.	

Yard lights are all operational.	
Spare or excess equipment storage area (Boneyard) is organized and neat.	
There are no observed safety issues.	
Permit or SOP Requirements	
All operations are compliant with permit requirements	
All operations are compliant with SOP or BMP requirements	
Inspections are properly done and findings are documented on work tickets	
All pending work tickets are promptly managed to completion.	
Landlord Footer	
Inspector Signature	
Attach Photo	
Inspection Overall Assessment	



CO Oil Terminal Inspection

Form Code: 478

Compliance Header	
Inspector Name	
Area of Inspection	
Inspection Date and Time	
CO Oil Terminal Inspection Instructions	
Instructions: Inspections must be conducted daily when facility is in operation. Note condition of inspection items. If item does not apply to an area, mark N/A. All unsatisfactory findings must be explained below. Include any repairs, changes or other remedial actions required or performed.	
Container Area Storage	
Container Segregation - Check to ensure that containers are stored in proper areas	
Containers Labels - Check for evidence of failure (e.g., no label, improper label, content, other).	
Containers - Check for evidence of failure (e.g., condition, bulging, leaks, rust, corrosion, other).	
Aisle Space - Check for evidence of failure (e.g., minimum 2 ft required, other).	
Incompatible Materials - Check to ensure that incompatible wastes are NOT stored together	
Secondary Containment - Check for evidence of failure (e.g., secondary containment, curbing, floor, cracks, deterioration, ponding or wet spots, other).	
Satellite Accumulation Containers - Check for condition and appropriate for area (e.g., filter/basket, solids, label and marking, other).	
Safety and Emergency Equipment	
Fire Extinguishers - In good condition, operable, accessible, charged, current inspection	
Eyewash & Safety Showers - Assessible and	

operational	
First Aid Kit - Items adequately stocked	
Spill Cleanup Equipment - Items adequately stocked	
Personal Protective Equipment - In good condition and adequately stocked	
Communication Devices - Operational, adequate supply	
Security	
Doors, Fence, Gates and Locks - All equipment is in good conditions (no corrosion or damage)	
Cameras & Video Equipment - Operational	
Storage Tanks	
Tank Exterior - Check for evidence of deterioration (e.g., condition, bulging, leaks, rust, corrosion, other)	
Base - Check for settling, cracks, leaks etc.	
Roof - Check for evidence of deterioration	
Volume Gauges - Check for proper operation accuracy	
Tanks (marked as to the contents) - Check for appropriate markings and that they are visible and not deteriorated (e.g., Non-Haz, Used Oil).	
Secondary Containment	
Floors and Walls - Containment free of cracks and gaps, coating has not failed	
Sumps - Sumps do not have any precipitation, accumulated dirt or waste	
Rigid Piping and Supports - Loading and unloading areas are free of cracks and releases. The sealant has not failed	
Dispensing Equipment	
Hoses, Connections and Valves - Check for evidence of failure (e.g., cracks, leaks, deterioration).	

Pumps, Pipes and Fittings - Check for evidence of failure (e.g., cracks, leaks, deterioration).	
Process Heaters	
Units (piping, valves, controls, natural gas feed, heat transfer oil) - Check for evidence of failure, deterioration	
Compliance Footer	
Inspector Signature	
Attach Photo	
Inspection Overall Assessment	

Attachment J

Closure Plan

1. INTRODUCTION

1.1 PURPOSE AND SCOPE

This closure plan describes the procedures that Safety-Kleen Systems, Inc. (S-K) will implement to achieve proper closure of final closure of all waste storage units, associated piping and containment areas at the facility. These consist generally of a tank farm with containment structures, a railcar loading area, truck loading areas, a building with waste drum storage area and an oil processing unit, and associated containment area(s) and features.

S-K would clean close each unit in accordance with the provisions of 40 Code of Federal Regulations (CFR) Part 265, Subparts G & J; Closure and Post Closure of Tank Systems, and Florida Administrative Code (F.A.C.) 62-762.801; Aboveground Storage Tank Systems. The procedures described herein should be adequate to close the facility without the need for post-closure monitoring. The goals of the closure plan procedures are to protect human health and the environment by eliminating post-closure escape of hazardous wastes, hazardous constituents, leachate or contaminated runoff to groundwater, surface waters and/or the atmosphere.

1.2 FACILITY LOCATION AND LAYOUT

S-K's Used Oil Processing Waste-Water Treatment Facility is located at 359 Cypress Road, Ocala, Marion County, Florida. Figure 1 shows the site location on a USGS Topographic map. The Figure 2 site plan shows the locations of the waste processing and storage units.

1.3 HAZARDOUS WASTE PERMIT

S-K Ocala receives non-hazardous waste only. Any incoming waste determined to be hazardous would be returned to the generator by a properly licensed hazardous waste transporter or sent to a properly permitted RCRA facility for processing. In the event that sludge generated from the treatment processes, maintenance, or the final facility cleaning for closure, is determined to be a hazardous waste the facility manages any hazardous waste generated under EPA ID Number FLR000060301.

1.4 FACILITY CONTACT

During closure the facility contact(s) are the following:

Safety-Kleen Systems, Inc.

359 Cypress Rd.
Ocala, Florida 34472

Primary Contact:

Wanda Hutchinson
Terminal Manager
Office: (352) 537-3071
Mobile: (352) 480-7828
Fax: (352) 687-8511
Home Cell: (352) 476-4125
Home Address: 3240 SW 34th Street Apt. 802
Ocala, FL 34474

Secondary Contact:

Joseph Ventry
Operations Manager
Office: (352) 537-3073
Mobile: (352) 425-4520
Home Cell: (352) 266-2206
Home Address: 2337 NE 12 Ct
Ocala, FL 34470

2.0 FACILITY DESCRIPTION

The Main Tank Farm Storage Area (MTFSA) has 16 tanks total storing the following - used oil, recycled fuel oil, and marine diesel fuel. The South Tank Farm (STFA) has three tanks for receiving industrial wastewater, one stormwater tank, and one off-road diesel fuel tank (out of service). The North Tank Farm (NTF) has two industrial wastewater tanks, one used antifreeze tank, one product antifreeze tank, and one off-road diesel tank. The Southern Tank Farm Area (SNTFA) has an additional eight tanks for used oil storage. The entire Tank Farm collectively has 34 bulk storage tanks. The Used Oil/Industrial Waste-Water Storage Area (UOIWWSA) has one 159,000-gallon, field-erected AST, Tank 53, that is officially "out of service", empty, and is schedule to be removed at a yet to be determined date.

2.1 PROCESS DESCRIPTION

S-K is primarily engaged in processing of used oil into recycled fuel oil and used oil filter

processing. In addition, the facility processes and bulks certain non-hazardous solid waste streams for transport to a solid waste landfill. The facility also conducts the storage of used oil, non-hazardous industrial wastewater, used antifreeze, used oil filters, and other petroleum contaminated materials. Used oil and related used oil products (filters, etc.) may come from a variety of sources including, but not limited to:

- Automotive and Industrial waste oil lubricants, cooling oils and wash water;
- Bilge slops and wash waters from the shipping industry;
- Wastewater and oils from storage tanks, pits, ponds, and lagoons associated with manufacturing operations;
- Wastewater and oils from tank cleaning and tank bottoms from petroleum storage facilities;
- Petroleum Contact Water as defined in Chapter 62-740, F.A.C.; and
- Solid waste from industrial generators.

S-K is dedicated to the transfer operations of industrial wastewater, petroleum contact water (PCW) and contaminated petroleum products through a relatively simple process which recovers petroleum product and then stores the water prior to shipment to a permitted industrial pretreatment facility. S-K processes "used oil" into recycled fuel oil (RFO) for resale as industrial burner fuel. This limited processing does NOT constitute a "refinery" operation and is not regulated as such.

Used oil waste streams that have been approved for acceptance are transported via licensed used oil haulers in bulk. Upon arrival at the S-K facility, a sample is acquired using a coliwasa sampler and analyzed to characterize the waste stream and to meet S-K quality assurance protocols.

Once Quality Assurance protocols are met, each waste stream is unloaded through appropriate lines to the designated storage/treatment tanks for process initiation:

- Wastewaters are transferred to storage tanks and shipped to a permitted industrial pretreatment facility for treatment and discharge to a Publicly Owned Treatment Works (POTW).
- All sludges are pumped to the sludge pit area for further dewatering.
- The remaining solids are solidified via mixing with inert materials to produce a solid waste. The solidified solid waste stream is sampled and analyzed on an annual basis for a hazardous waste determination. The solidified sludges will be disposed of at a

properly permitted facility if the waste stream is determined to be a hazardous waste.

- The liquid removed from these processes are stored on-site and transferred off-site for permitted industrial wastewater pretreatment.
- Any petroleum product recovered is tested for compliance with the federal used oil regulations found in 40 CFR Part 279 and the federal polychlorinated biphenyls regulations found in 40 CFR Part 761.20(e).
- All petroleum product is sold to end users.
- The estimated life of the operation is long based on the fact that no on-site disposal takes place.

2.2 WASTE CHARACTERISTICS

All wastewater and used oil received to date has been non-hazardous, non-regulated. S-K characterizes all waste received at operation according to its waste analyses plan in accordance with Attachment C of this permit. Additionally, the facility may generate small quantities of hazardous waste through its treatment processes.

2.3 OPERATIONAL HISTORY

The facility has been operational since 2000. S-K assumed ownership of the facility from Atlantic Industrial Services, Inc. in January 2009.

2.4 UNIT DESCRIPTIONS

2.4.1 TANK SYSTEMS

2.4.1(a) Tanks

All process/storage tanks are constructed of steel. The combined volume of the tanks in the entire facility is approximately 957,020 gallons. Please refer to SPCC Table 3 for a listing of all the tanks, their contents, containment areas, etc.

2.4.1(b) Secondary Containment Systems

Warehouse Building - Processing Unit/Area and Mini Distribution Center (WB-PADC)

The north half of the Warehouse Building, near the northeast corner of subject site, houses a used oil processing and dehydration system. The entire system area is in-doors and walled on all sides. The floor is constructed of 6-inch thick, reinforced concrete. Concrete berms and sumps exist below the surface level of the foundation. All concrete is sealed with an epoxy coating. The containment berms are constructed of concrete masonry units and also are sealed to a height of 4-inches above floor level with the same type of sealer mentioned above. The roof cover is metal in this area. The area of the processing units is approximately 12,000 square feet (ft²).

Solid Waste Solidification Area (SWSA)

The SWSA is situated near the northwest corner of site. The area is outdoors, fenced and/or walled on all sides. The floor is constructed of 8-inch thick reinforced concrete. A concrete berm exists above the surface level of the foundation. All concrete is sealed with an epoxy coating. The containment walls are constructed of solid concrete and also are sealed to a minimum height of 2-ft above floor level with the same type of sealer mentioned above. There is roof cover. The solid waste area will be closed under the solid waste closure plan.

Outdoor Tank Farm Storage Areas:

The Main Tank Farm Storage Area (MTFSA) was build first. Two additional tank-receiving areas were constructed in 2001-2002, north and south of the MTFSA, and using similar construction. The North and South Tank Farm secondary containment areas are connected to the MTFSA. A second area south of the Tank Farm was constructed in 2004, the "Southern" Tank Farm Area (SNTFA). Please refer to SPCC Plan Table 4 for estimates of the areas and volumes of the various secondary containment areas. Combined, the above outdoor containments cover 12,855 square ft and can contain up to an estimated 391,086 gallons (or 52,284 cubic feet).

A Used Oil/Industrial Waste-Water Storage Area (UO-IWW-SA) of approximately 10,400 ft² was added in 2005, in the southeast area of the site. It was to contain the two, field-erected, 159,000-gallon ASTs. One of those has been removed and the remaining Tank 53 is out of service and slated for removal.

Warehouse Building – Filter Processing Area (WB-FP)

The south half of the Warehouse Building, covers approximately 10,000 square ft. It

houses the used oil filter receiving pit, conveyor, and sorting/crushing unit. The chemical storage area (cabinet/s) is located within this area and is also situated within the above-mentioned containment. This building area is also used to store or stage drums that contain used oil filters (“exempt drained oil filters”, not regulated as “used oil drums”), and filter drums that have been emptied. The area is also used to stage full and empty 330-gallon totes for new oil sales. Other than the filter pit, the area is constructed similarly to the north half of the building. The entire warehouse is approximately 25,000 square ft. Its control room (for the north half equipment) divides the north and south halves of the building.

3.0 CLOSURE PROCEDURES

3.1 GENERAL

S-K will perform a clean closure on all tanks and ancillary piping, and the drum storage area in accordance with the provisions of 40 CFR Part 265, Subpart G, 40 CFR Part 265, Subpart J and F.A.C. 62-762.801. Run-off/run-on will be controlled by the existing secondary containment structures at each unit. It will be disposed of in the same manner as decontamination rinseate as described in the following sections.

3.2 CLEAN CLOSURE PROCEDURES

3.2.1 WASTE CHARACTERIZATION

The various waste streams will be characterized using generator knowledge and/or existing laboratory analyses available at the facility as previously described in Attachment C of the permit/application. Should additional characterization be required, Table J-1 lists the applicable waste characterization analyses that may be required.

3.2.2 TREATMENT/STORAGE TANK/PIPING CLOSURE

This closure procedure is primarily to ensure that the tanks and/or ancillary piping are cleaned in accordance with currently accepted practices and federal, state, and local regulations. All tanks, open or closed, shall be cleaned by the same procedures outlined below. The contents of all tanks and vessels are known and documented including laboratory testing. The facility processes non-hazardous petroleum products.

The remaining contents of all ancillary piping will be purged back into the storage tanks using

fresh air or nitrogen. Remaining used oil, fuel oil, marine diesel fuel/used oil will be pumped out by licensed/permitted oil recycler. The tanks will be purged with fresh air (through the manway for closed tanks) to establish a non-hazardous environment.

After the removal of all liquids from the storage tanks, the tanks will be cleaned/decontaminated using the Butterworth® tank cleaning system (or equivalent). The rinsate water, degreasing agents and sludges/sediments will be collected transported for offsite disposal at a permitted facility. These wastes are classified as Petroleum Contaminated Water (PCW) based on generator knowledge and will be disposed offsite as such at a permitted facility.

The piping will be cleaned/decontaminated by flushing with water with degreasing agents and this PCW will be disposed as described above. The criteria used to determine if the tank system has been properly decontaminated are:

- No visible residues remain in the piping rinseate or tanks.

The closure assessment of the regulated storage tanks will be completed in accordance with F.A.C. 62-762.801 and the FDEP's "Storage Tank System Closure Assessment Requirements" at the time of used oil permit closure. A closure assessment report will be submitted within 60-days after completion of closure activities. After cleaning/decontamination procedures are complete, the tanks, piping, and processing equipment will be dismantled and hauled off site for recycling as scrap steel.

3.2.3 CONCRETE TANK PAD CLOSURE

The tank pads and the processing/warehouse pad are visually inspected before and after decontamination for evidence of cracks and spills. If cracks and spillage are identified, additional sampling will be conducted (Section 4.3). The pads are decontaminated using a low pressure water rinse and scrub brushing with a degreasing agent compatible with the stored waste stream. The rinsate will be contained by existing curbing and collected and containerized for transportation for offsite disposal at a permitted facility as PCW.

3.2.4 SOLID WASTE MANAGEMENT AREA (SWMA) CLOSURE

The process for the closure of the SWMA will entail the removal and containerization of remaining solidified wastes into roll-off boxes or drums. Upon characterization of the waste as described in Section 3.2.1, the containerized solidified waste will be transported offsite to either a permitted thermal treatment facility (F.A.C. 62-775) or to a Class I landfill (F.A.C. 62-701). The SWMA will be decontaminated by pressure washing with a degreasing agent and containerization of the rinseate for transportation for offsite

disposal at a permitted facility as PCW.

3.3 EQUIPMENT DECONTAMINATION

An equipment decontamination staging area will be established at a central location to all units. All equipment used during the closure activities other than sampling equipment, (e.g., brushes, shovels, and tank cleaning equipment) will be decontaminated by steam cleaning with an Alconox wash solution. All rinse water will be contained by portable berming and collected for disposal as PCW as previously described in the closure procedures.

4.0 CONTINGENCY PLAN

The purpose of this plan is to outline an investigation program to verify that clean closure of the facility has been obtained.

The concrete pads underlying the tank systems will be inspected before and after decontamination for evidence of cracks and spills. If cracks and spillage are identified, a soil sample will be collected from beneath the concrete pad(s) at the location of each crack or spillage. If cracks of length greater than 10 ft are found, a soil sample will be collected every 10 ft along the crack. No soil sample will be collected within 10 ft of any other soil sample location.

4.1 CLEAN CLOSURE VERIFICATION

FDEP Storage Tank System Closure Assessment Requirements prescribe that soil sampling is required for areas of visually stained soils. Soil samples should be obtained as close to the fill port area as possible or from the “worse-case” visually stained soil. For the purpose of obtain clean closure, soil samples will be collected from around each of the tank farm areas and nearest to the former location of the ASTs.

If soil sampling is necessary, a 4-inch core will be mechanically drilled through the concrete containment pad(s) if cracks and visible staining were observed prior containment area cleaning/decontamination procedures described above. A soil sample will then be collected from a depth of 0 to 12 inches using a 3.25-inch diameter stainless steel auger. Analytical parameters will be the same as previously listed in closure procedures. A background soil sample will be collected from an area of the facility not affected by facility operations and analyzed for the same parameters. The data that will

be used to determine if the soil underlying the concrete pad(s) has been contaminated by used oil. The area will be deemed to be clean if the parameters are below FDEP Soil Cleanup Target Levels (SCTLs) of Chapter 62-777, FAC, or other clean closure criteria if the site cleanup rules in Chapter 62-780, FAC. For example, parameter concentrations that are less than or equal to natural background concentrations are considered compliant.

If results of analyses of sample collected from beneath the tank and warehouse/processing plant pad(s) indicate concentrations of contaminants above regulated levels, a soil investigation work plan will be developed and submitted under separate cover. It will include a soil boring program to determine the extent of contamination. The soil investigation work plan will specify the appropriate sampling procedures. Once the extent of contamination, if any, is defined, a plan for remediation of contaminated subsoil will be submitted under separate cover, pursuant to Chapter 62-780, FAC.

4.2 SOIL EXCAVATION

The depth of excavations to remove any contaminated soils will be determined by the soil sampling program previously discussed. For the purpose of clean closure, excavations will be made to the depth of the boring at which constituents in the soils are at background or compliant levels. Any contaminated soils will be disposed of at an offsite permitted waste management facility.

4.3 SOIL SAMPLING

Soil samples will only be collected from beneath the concrete pads if visual staining is observed near an observed crack in the pad. After coring of the concrete at each area to be sampled, a polyethylene sheet will be placed on the pad near the sampling location. For all other soil samples, a polyethylene sheet will be placed on the ground adjacent to the sampling location. All sampling equipment and sample containers will be placed on the sheets when not in use. Soil samples will be collected from a depth of 0–12 inches using a stainless steel 3.25-inch diameter auger bit on a handheld auger. The soil samples will be placed in glass sample containers provided by the contract laboratory. All sample containers will be labeled with the facility name, sampling location, sample identification number and date and time of sample collection. All sample containers will be placed in plastic bags on ice in an insulated cooler. Appropriate chain-of-custody forms will be completed and sent to the analytical laboratory with the samples. All used sampling equipment will be decontaminated on site.

4.3 SAMPLING QUALITY CONTROL PROCEDURES

Soil samples will be collected in accordance with DEP SOP 001/01 FS 3000. Soil sampling locations will be based on the observance of visual staining in accordance with the FDEP Tank Closure Assessment Guidelines. For the purpose of estimating closure assessment costs, it was assumed that up to 20 sampling locations may be required.

Prior to initiating any soil and groundwater sampling activities, all sampling multi-use equipment will be decontaminated using Alconox detergent, potable water, propanol, deionized water and wrapped in plastic bags to reduce the potential for contamination prior to use. Groundwater sampling will be conducted using dedicated unused HDPE tubing. Latex gloves will be worn by all sampling personnel during sampling activities and changed between each sampling location to prevent cross contamination. All sample containers will be obtained from the laboratory providing the analytical services. All sample containers will be placed in sealed plastic bags, on ice, in an insulated cooler for transport to the lab by courier.

4.6 GROUNDWATER SAMPLING

Groundwater samples will be collected in accordance with DEP SOP001/01 FS 2200. Groundwater will be sampled at locations to be determined based on soil sampling described above. At least one monitoring well will be placed at the point of highest soil contamination, or the monitoring well will be placed upgradient for background data and monitoring wells will be placed down gradient. Groundwater samples will be obtained from each well using a peristaltic pump for low flow purging as a quiescent sampling method. The groundwater samples will be analyzed for parameters listed in Table J-1 The analytical parameter list may also be modified to reflect changes in city, state or federal law, or findings from prior samples. Groundwater will be assessed to define a contaminant plume should one be identified. The groundwater assessment will be completed in accordance with FDEP Tank Closure Assessment Guidelines and, if applicable, the contaminated site assessment and cleanup rules of Chapter 62-780, FAC.

5.0 CLOSURE COST ESTIMATE

The cost estimate to complete the closure activities is based on clean closure of each unit. The tank and concrete pad decontamination will be performed by a professional tank cleaning service and continually monitored by a professional engineer's (P.E.)

representative. The P.E. will make periodic site inspections for collecting samples and verifying the decontamination procedures. A final closure report will be prepared by the engineer's representative and certified by the P.E.

Associated detailed cost tables, third-party cost estimates, and background data obtained during the costing of this plan were provided with the prior permit renewal application in 2011-2012. Pursuant to the requirements of Rule 62-710.800(6) a formal cost estimate adjustment using DEP Form 62-710.901(7) was submitted for approval on February 9, 2021. DEP approval was granted September 21, 2021.

6.0 CLOSURE SCHEDULE

The sequence for closing the individual tanks will be determined or approved by the P.E. All non- hazardous and identified hazardous wastes will be disposed of within 90 days after approval of the closure plan or within 90 days of the hazardous waste accumulation start date for each container. The FDEP will be notified 60 days prior to initiating closure activities. The clean closure will be completed within 180 days of commencing work.

7.0 CLOSURE CERTIFICATION

Site visits will be conducted by an independent registered professional engineer or engineer's representative during the closure activities. The engineer will verify that wastes have been removed, tanks and pads have been cleaned, and samples have been collected and analyzed for the appropriate analytes. The engineer will be responsible for evaluating/validating all sampling and analytical data and the evaluation of those results against applicable regulatory criteria, from Chapters 62-777 and 62-780, FAC.

8.0 FINANCIAL ASSURANCE

Financial Assurance is required for the purpose of this closure plan in accordance with Florida Administrative Code (F.A.C.) 62-710.800(6). This plan is submitted to the FDEP/EPA for the purpose of obtaining a used oil processing facility permit, to be a designated facility for PCW as defined in Chapter 62-740, F.A.C., and to secure the required Solid Waste Processing Facility Permit under Chapter 62-701, FAC for the solid waste management operations.

Table J-1. Waste Characterization Laboratory Analyses

Safety-Kleen Systems, Inc.
Ocala Used Oil Processing Facility

1 Solid Waste

1.1 <u>Thermal Treatment</u>	Method No.	Allowable Limit
TCLP Aresnic	1311/7060	5.0 mg/L
TCLP Barium	1311/7080	100.0 mg/L
TCLP Cadmium	1311/7131	1.0 mg/L
TCLP Chromium	1311/7191	5.0 mg/L
TCLP Lead	1311/7421	5.0 mg/L
TCLP Mercury	1311/7471	0.2 mg/L
TCLP Selenium	1311/7740	1.0 mg/L
TCLP Silver	1311/7761	5.0 mg/l
TCLP Volatiles	1311/624/8260	Refer to 40 CFR 261.24
Total Organic Halides	1311/624/8260	Refer to 40 CFR 261.24
TCLP PCBs	1311/8082	50 mg/L
TPH	FL-PRO	n/a

1.2 <u>Landfill</u>	Method No.	Allowable Limit
TCLP Aresnic	1311/7060	5.0 mg/L
TCLP Barium	1311/7080	100.0 mg/L
TCLP Cadmium	1311/7131	1.0 mg/L
TCLP Chromium	1311/7191	5.0 mg/L
TCLP Lead	1311/7421	5.0 mg/L
TCLP Mercury	1311/7471	0.2 mg/L
TCLP Selenium	1311/7740	1.0 mg/L
TCLP Silver	1311/7761	5.0 mg/l
TCLP Volatiles	1311/624/8260	Refer to 40 CFR 261.24

2 Closure Assessment

2.1 <u>Soil</u>	Method No.	Allowable Limit
Volatile Organics	8260	Refer to Ch. 62-777 FAC
Semivolatile Organics	8270	Refer to Ch. 62-777 FAC
TRPHs	FL-PRO	Refer to Ch. 62-777 FAC
Arsenic	6010	Refer to Ch. 62-777 FAC
Cadmium	6010	Refer to Ch. 62-777 FAC
Chromium	6010	Refer to Ch. 62-777 FAC
Lead	6010	Refer to Ch. 62-777 FAC
PCBs	8080/8270	Refer to Ch. 62-777 FAC

2.2 <u>Groundwater</u>	Method No.	Allowable Limit
Volatile Organics	8260	Refer to Ch. 62-777 FAC
Semivolatile Organics	8270	Refer to Ch. 62-777 FAC
TRPHs	FL-PRO	Refer to Ch. 62-777 FAC
Arsenic	6010	Refer to Ch. 62-777 FAC
Cadmium	6010	Refer to Ch. 62-777 FAC
Chromium	6010	Refer to Ch. 62-777 FAC
Lead	6010	Refer to Ch. 62-777 FAC
PCBs	8080/8270	Refer to Ch. 62-777 FAC

3 Used Oil

Parameters	Method No.	Allowable Limit
Flash Point	1010/1030	>140 F (>60 C)
% Water		
Arsenic	1311/7060	5.0 mg/L
Barium	1311/7080	100.0 mg/L
Cadmium	1311/7131	1.0 mg/L
Chromium	1311/7191	5.0 mg/L
Lead	1311/7421	5.0 mg/L
Total Chlorine (Halogens)	1311/624/8260	Refer to 40 CFR 261.24
Total Sulfur	9075	Refer to 40 CFR 261.24
PCB	8082	Refer to 40 CFR 261.24

Source: Millennium Laboratory, ECT 2012.

4 Wash Water/PCW

Parameters	Method No.	Allowable Limit
Flash Point	1010/1030	>140 F (>60 C)
pH	150.1	>2 or < 12.5
Arsenic	1311/7060	5.0 mg/L
Barium	1311/7080	100.0 mg/L
Cadmium	1311/7131	1.0 mg/L
Chromium	1311/7191	5.0 mg/L
Lead	1311/7421	5.0 mg/L
Mercury	1311/7471	0.2 mg/L
Selenium	1311/7740	1.0 mg/L
Silver	1311/7761	5.0 mg/l
Benzene	1311/624/8260	0.5 mg/L
Sludges		

Parameters	Method No.	Allowable Limit
TCLP Aresnic	1311/7060	5.0 mg/L
TCLP Barium	1311/7080	100.0 mg/L
TCLP Cadmium	1311/7131	1.0 mg/L
TCLP Chromium	1311/7191	5.0 mg/L
TCLP Lead	1311/7421	5.0 mg/L
TCLP Mercury	1311/7471	0.2 mg/L
TCLP Selenium	1311/7740	1.0 mg/L
TCLP Silver	1311/7761	5.0 mg/l
TCLP Volatiles	1311/624/8260	Refer to 40 CFR 261.24
TCLP Semivolatiles	1311/625/8270	Refer to 40 CFR 261.24
TCLP Pesticides	1311/608/8081	Refer to 40 CFR 261.24
TCLP Herbicides	1311/615/8321	Refer to 40 CFR 261.24

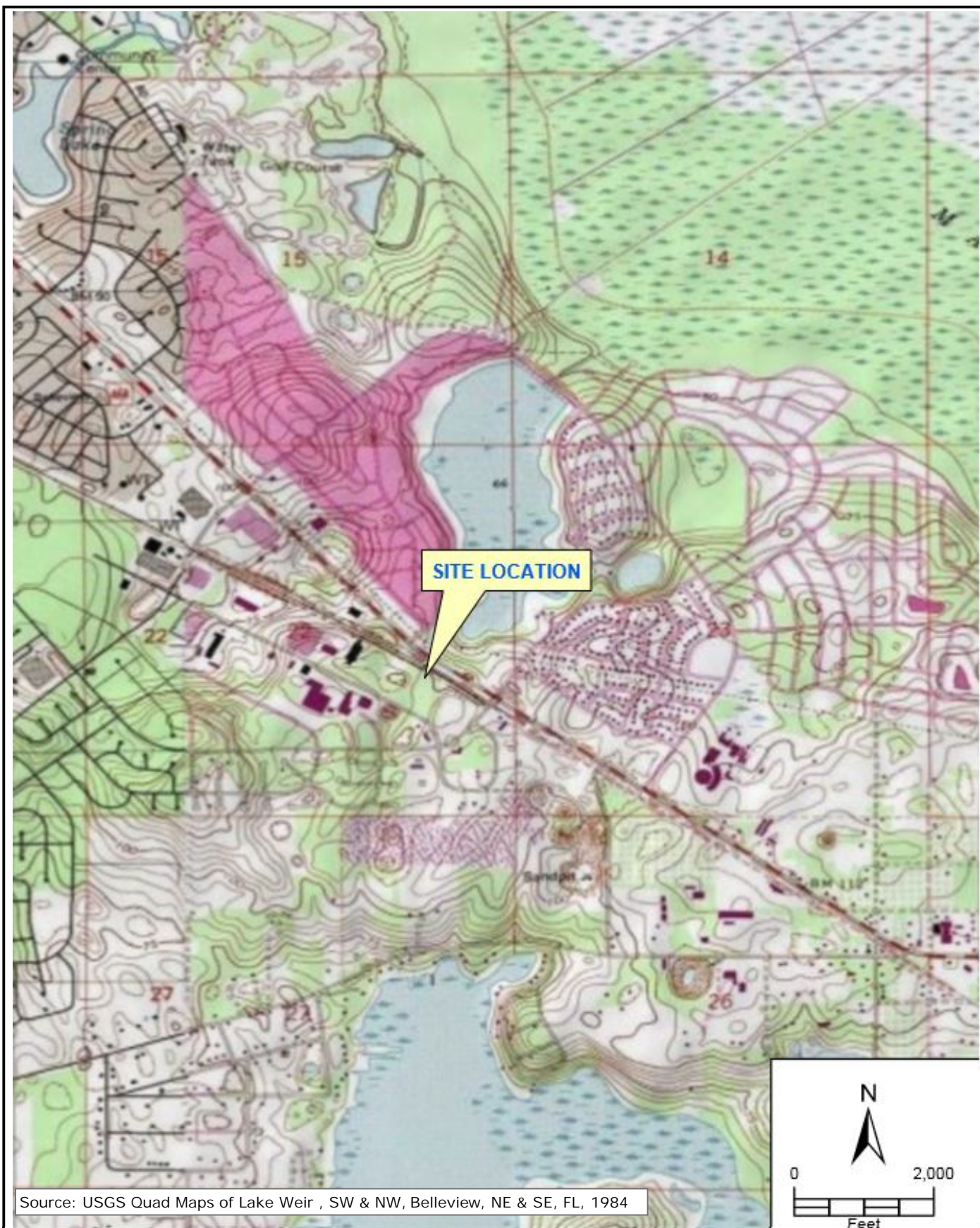


FIGURE 1- SITE VICINITY MAP
SAFETY-KLEEN SYSTEMS, INC.
OCALA , FLORIDA

safety-kleen.
PROTECTION-CHOICES-PEOPLE
MAKE GREEN WORK

Attachment K

Description of Employee Training

EMPLOYEE TRAINING DESCRIPTION

Used Oil Transporter Staff Training-Florida

All S-K Used oil transporters and facility staff receive customized training through an internal online learning system, in person classroom training, and on the job training with experienced personnel. Training is conducted on an annual basis. Training topics covered include, but are not necessarily limited to:

- Federal, state and local rules regulating used oil;
- SK-developed and implemented facility practices and spill/release response procedures;
- Facility-specific procedures as specifically defined in the facility SPCC Plan;
- Operating procedures for halogen screening during pickups; and
- New Employee introductory training, job specific training.

All new employees are trained as soon as practicable and no later than 90 days after the beginning of their employment with S-K. Training records of employees are generally maintained by the respective facility manager to which the employee reports. The following Attachment is representative of the training content delivered to S- K's employees involved in the transportation of used oil.



Safety-Kleen Facilities Used Oil Transporter Training - Florida



Federal Used Oil Regulations: 40 CFR Part 279

USED OIL = any oil that has been refined from crude oil, or any synthetic oil, that has been used and as a result of such use is contaminated by physical or chemical impurities

USED OIL TRANSPORTER = any person who transports used oil, any person who collects used oil from more than one generator and transports the collected oil, and owners and operators of used oil transfer facilities. Uses oil transporters may consolidate or aggregate loads of used oil for purposes of transportation but, with the following exception, may not process used oil. Transporters may conduct incidental processing operations that occur in the normal course of transportation (e.g., settling and water separation), but that are not designed to produce (or make more amenable for production of) used oil derived products or used oil fuel.



40 CFR 279 Subpart E-Standards for Used Oil Transporters/Transfer Facilities

279.40 – Applicability

- **Applies to all used oil transporters except;**
- **On-site transporters, generators who transport shipments of used oil totaling 55 gal. or less from the generator to a used oil collection center, generators who transport shipments of used oil totaling 55 gal. or less from the generator to a used oil aggregation point owned or operated by the same generator, or transportation of used oil from household DIY's to a regulated used oil generator, collection center, aggregation point, processor/re-refiner, or burner subject to the requirements of this part**
- **Does apply to transportation of collected household DIY's used oil from regulated used oil generators, collection centers, aggregation points, or other facilities where household DIY's used oil is collected**



40 CFR 279 Subpart E Continued

279.41 – Restrictions on transporters who are not also processors/re-refiners

- **Used oil transporters may consolidate or aggregate loads of used oil for purposes of transportation. However, may not process used oil unless they also comply with subpart F – processors/re-refiners.**
- **Transporters may conduct incidental processing operations that occur in the normal course of used oil transportation (settling & water separation), but that are not designed to produce (or make more amenable for production of) used oil derived products unless they also comply with the requirements in subpart F**
- **Transporters of used oil that is removed from oil bearing electrical transformers and turbines and filtered by the transporter or at a transfer facility prior to being returned to its original use are not subject to the processor/re-refiner requirements in subpart F**



40 CFR 279 Subpart E Continued

279.42 – Notification

- **Used Oil transporters must have an EPA ID number**

279.43 – Used Oil Transportation

- **Used oil transporters must deliver all used oil received to: another used oil transporter, used oil processing/re-refining facility, an off-specification used oil burner facility, or an on-specification used oil burner facility**
- **Used oil transporters must comply with all applicable requirements under the USDOT regulations in 49 CFR Parts 171 – 180**
- **In the event of a discharge of used oil during transportation, the transporter must take appropriate action to protect human health and the environment (e.g., notify local authorities, and dike the discharge area)**



40 CFR 279 Subpart E Continued

279.43 – continued

- **An air, rail, highway, or water transporter who has discharged used oil must: give notice, if required by 49 CFR 171.15 to the National Response Center (800-424-8802 or 202-426-2675; and**
- **Report in writing to the Director, Office of Hazardous Materials Regulations, Materials Transportation Bureau, DOT, Washington, DC**
- **A transporter must clean up any used oil discharged that occurs during transportation or take such action as may be required or approved by federal, state, or local officials so that the discharge no longer present a hazard to human health or the environment**



40 CFR 279 Subpart E Continued

279.44 – Rebuttable presumption for used oil

- **To ensure the used oil is not a hazardous waste the used oil transporter must determine whether the total halogen content of used oil being transported or stored at a transfer facility is above or below 1,000 ppm**
- **Transporter must make this determination by; testing the used oil, or applying knowledge of the halogen content of the used oil in light of the materials or processes used**
- **If the used oil contains greater than or equal to 1,000 ppm total halogens, it is presumed to be a hazardous waste**
- **The owner or operator may rebut the presumption by demonstrating the used oil does not contain hazardous waste by using an analytical method from SW-846**



40 CFR 279 Subpart E Continued

279.44 – continued

- Rebuttable presumption does not apply to metalworking oils/fluids containing chlorinated paraffins, if they are processed, through a tolling arrangement as described in 279.24(e), to reclaim metalworking oils/fluids. The presumption does apply to metalworking oils/fluids if such oils/fluids are recycled in any other manner, or disposed
- Rebuttable presumption does not apply to used oils contaminated with chlorofluorocarbons (CFCs) removed from refrigeration units if the CFCs are destined for reclamation. Rebuttable presumption does apply to used oils contaminated with CFCs that have been mixed with used oil from sources other than refrigeration units
- Records of analyses conducted or information used to comply with the above must be maintained by the transporter for at least 3 years



40 CFR 279 Subpart E Continued

279.45 – Used oil storage at transfer facilities

- **Used oil transporters are subject to all applicable Spill Prevention, Control and Countermeasures (40 CFR Part 112)**
- **Used oil transfer facilities = shipments of used oil are held for more than 24 hours during the normal course of transportation and not longer than 35 days**
- **Must store used oil in units, tanks, or containers subject to regulation under 40 CFR parts 264 & 265**
- **Containers used to store used oil must be: in good condition (no severe rusting, apparent structural defects or deterioration and not leaking**
- **Containers must be equipped with a secondary containment system consisting of, at a minimum: dikes, berms or retaining walls; and a floor converging the entire area; or an equivalent secondary containment system**



40 CFR 279 Subpart E Continued

279.45 – continued

- **The entire containment system must be sufficiently impervious to used oil**
- **Aboveground tanks used to store used oil at transfer facilities must be equipped with a secondary containment system meeting the above requirements**
- **Containers and aboveground tanks used to store used oil must be labeled clearly with the words “Used Oil”**
- **Upon detection of a release of used oil the owner/operator must perform the following cleanup steps: stop the release; contain the released used oil; clean up and manage the used oil and other materials properly; if necessary, repair or replace any leaking used oil storage container or tanks prior to returning them to service**



40 CFR 279 Subpart E Continued

279.46 – Tracking

- **Used oil transporters must keep a record of each used oil shipment accepted that includes:**
- **Name, address of generator, transporter, or processor/re-refiner who provided the used oil for transport**
- **EPA ID number (if applicable) of the generator, transporter, or processor/re-refiner who provided the used oil for transport**
- **Quantity of used oil accepted**
- **Date of acceptance; and signature, dated upon receipt of the used oil, of a representative of the generator, transporter, or processor/re-refiner who provided the used oil for transport**



40 CFR 279 Subpart E Continued

279.46 – continued

- **Used oil transporters must keep a record of each shipment of used oil that is delivered to another transporter, used oil burner, processor/re-refiner, or disposal facility. Records must include:**
- **Name and address of the receiving facility or transporter**
- **EPA ID number of transporter or receiving facility**
- **Quantity of used oil delivered**
- **Date of delivery; and signature, dated upon receipt of the used oil, of a representative of the receiving facility or transporter**
- **Records must be maintained for at least 3 years**



Florida Used Oil Regulations: Chapter 62-710 F.A.C.

Chapter 62-701.300(8)(b) – no person shall dispose of used oil in a landfill, except as provided in Chapter 62-710 FAC

Chapter 62-701.300(11)(a) - no person may mix or comingle used oil with solid waste that is to be disposed of in landfills or directly dispose of used oil in landfills

(11)(b) – oily wastes, sorbents or other materials used for maintenance or to clean up or contain leaks, spills or accidental releases and soils contaminated with used oil as a result of spills or accidental releases are not subject to the above

Used Oil = any oil which has been refined from crude oil or synthetic oil and, As a result of use, storage, or handling, has become contaminated and

Unsuitable for its original purpose due to the presence of physical or chemical Impurities or loss of original properties

Oily wastes = those materials which are mixed with used oil and have become Separated from that used oil. Oily waste also means materials, including

Wastewaters, centrifuge solids, filter residues or sludges, bottom sediments, Tank bottoms, and sorbents which have come into contact with, and have been Contaminated by, used oil



Chapter 62-710 FAC

62-710.300 – Applicability

- **used oil transporters and transfer facilities shall comply with 40 CFR part 279 Subpart E and meet the registration, recordkeeping, and certification requirements found in 62-710.500 and 62-710.510**

62-710.400 – Prohibitions

- **no person may collect, transport, store, recycle, use, or dispose of used oil, filters or oily wastes except as authorized in this chapter or in Chapter 403, F.S.**
- **no person may discharge used oil into soils, sewers, drainage systems septic tanks, surface or ground waters, watercourses, or marine waters**
- **no person may mix or comingle used oil with hazardous substances that make it unsuitable for recycling or beneficial use with the exception of provisions found in 40 CFR 279.10(b)(3) – CESQG mixtures**



Chapter 62-710

62-710.400 – continued

- **Used oil tanks or containers not stored inside a structure shall be closed, covered or otherwise protected from the weather. Tanks that are not double-walled should be stored on an oil-impermeable surface and must have secondary containment with the capacity to hold 110% of the volume of the largest tank or container within the containment area**

62-710.500 – Registration and Notification

- **Used oil transporters and transfer facilities must register annually with the Florida Department of Environmental Protection (FDEP)**



Chapter 62-710 Continued

62-710.510 – Record Keeping and Reporting

- **each registered person shall maintain records that include: name, business address, telephone number and EPA ID number of the transporter; source of the used oil – name, street address, and EPA ID number if the generator has one; total number of gal. received from each source; type of used oil received; date of receipt; destination of end use of used oil and oily wastes; and documentation of halogen screening**
- **transporters shall maintain records of all shipments of used oil, including those accepted for transport as well as those refused due to suspected mixing with hazardous waste – a copy of this record shall be left with the generator**
- **records shall be retained for a period of 3 years**
- **submit an annual report on March 1st for the preceeding year**



Chapter 62-710 Continued

62-710.600 – Certification Program for Used Oil Transporters

- **Transporters that transport over public highways more than 500 gal. of used oil annually shall certified by the FDEP**
- **Used oil transporters shall: register annually and comply with record keeping and reporting requirements; submit a training program for approval to the FDEP showing compliance with state and federal rules governing used oil; proper used oil management practices, including appropriate response action to any release or spill; detailed description of the company's SOP for halogen screening at each pick up location; introduction of each new employee to the applicable laws and rules before unsupervised driving of a used oil transportation vehicle; and documentation that all company personnel handling or transporting used oil have successfully completed the training – no later than 90 days after beginning employment**



Chapter 62-710 Continued

62-710.600 – continued

- **Maintain a record of training in the company's operating record and the individual personnel files indicating the type of training received along with the dated signature of those receiving training and providing the training**
- **Have, verify, and maintain vehicle insurance with a combined single limit of no less than \$1,000,000**

62-710.850 – Management of used oil filters

- **Landfill disposal of used oil filters is prohibited in Florida**
- **Transporters, transfer facilities must register with the FDEP**
- **Containers must be labeled "Used Oil Filters" and in good condition (no severe rusting, apparent structural defects or deterioration) with no visible leaking**



Chapter 62-710 Continued

62-710.850 – continued

- **containers shall be sealed or otherwise protected from weather and stored on an oil-impermeable surface**
- **upon detection of a release from any used oil filter container the facility must: stop the release; contain the released oil; clean up and manage properly the released oil and any oily waste in accordance with Chapter 770, FAC; and repair or replace any leaking used oil filter storage containers prior to returning them to service**



Chapter 403 Florida Statutes

403.121 – FDEP may recover damages for any injury to the air, waters, or property of the State and may impose a \$10,000 penalty for each offense (each day of violation is a separate offense)

403.141 – anyone who pollutes may held jointly and severally liable (from the generator through the final destination facility can be held liable for the pollution)

403.161 – it is a violation of state law to cause pollution, fail to comply with any laws or rules, make false statements regarding these laws and rules or fail to report discharges. There are 3 types of violations:

- **willfully polluting – 3rd degree felony punishable by \$50,000 and/or 5 years imprisonment for each offense**
- **anyone who pollutes due to reckless indifference or gross careless disregard – 2nd degree misdemeanor punishable by \$5,000 and/or 60 days in jail for each offense**
- **anyone who fails to comply with any laws or rules is guilty of 1st degree misdemeanor, punishable by \$10,000 and/or 60 months in jail**



Chapter 403, F.S. Continued

403.708 – no person shall deposit any solid waste in or on the land or waters located within the state except in a manner approved by the Department

No person shall dispose of used oil in landfills

403.751 – no person may manage used oil in any manner which endangers public health or welfare:

- **No person may discharge used oil into any storm drain, sewer, septic tank, or body of water**
- **No person may mix used oil with solid waste that is to be disposed of in a landfill**
- **No person may mix used oil with a hazardous substance**
- **Used oil shall not be used for road oiling, dust control, weed abatement**

403.7545 - shall prohibit the department from regulating used oil in a manner consistent with the United States Environmental Protection Agency, or as a hazardous waste in a manner consistent with s. 241 of the Hazardous and Solid Waste Amendments of 1984

Part II Certifications

Form 62-710.901(6) Facility Owner Certification

Form 62-710.901(6) Operator Certification

Form 62-710.901(6) Land Owner Certification

Form 62-710.901(6) P.E. Certification

APPLICATION FROM FOR A USED OIL PROCESSING PERMIT

PART II - CERTIFICATION

Form 62-710.901(6) Facility Owner Certification

Facility Name: Safety-Kleen Systems, Inc. EPA ID# FLR000060301

This is to certify that I understand this application is submitted for the purpose of obtaining a permit to construct, or operate a used oil processing facility. As the facility owner, I understand fully that the facility operator and I are jointly responsible for compliance with the provisions of Chapter 403, Florida Statutes, Chapters 62-701 and 62-710, F.A.C., and all rules and regulations of the Department of Environmental Protection.



Signature of the Operator or Authorized Representative*

JEFF CURTIS, Senior Environmental Compliance Manager
Name and Title (Please type or print)

Date: 1/24/2022 Telephone: 561-533-4719

Email: jeff.curtis@safety-kleen.com

* If authorized representative, attach letter of authorization.

APPLICATION FORM FOR A USED OIL PROCESSING PERMIT

PART II - CERTIFICATION

TO BE COMPLETED BY ALL APPLICANTS

Form 62-710.901(6) Operator Certification

Facility Name: Safety-Kleen Systems, Inc. EPA ID# FLR000060301

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 gathered and evaluated the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, 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 or knowing violations. Further, I agree to comply with the provisions of Chapter 403, Florida Statutes, Chapters 62-701 and 62-710, F.A.C., and all rules and regulations of the Department of Environmental Protection



Signature of the Operator or Authorized Representative*

Jeff Curtis, Senior Environmental Compliance Manager

Name and Title (Please type or print)

Date: 1/24/2020 Telephone: 561-553-4719

Email: jeff.curtis@safety-kleen.com

* If authorized representative, attach letter of authorization.

APPLICATION FROM FOR A USED OIL PROCESSING PERMIT

PART II - CERTIFICATION

Form 62-710.901(6) Land Owner Certification

Facility Name: Safety-Kleen Systems, Inc. EPA ID# FLR000060301

This is to certify that I, as land owner, understand that this application is submitted for the purpose of obtaining a permit to construct, or operate a used oil processing facility on the property as described.



Signature of the Operator or Authorized Representative*

JEFF CURTIS, Senior Environmental Compliance Manager

Name and Title (Please type or print)

Date: 1/24/2022 Telephone: 561-533-4719

Email: jeff.curtis@safety-klan.com

* If authorized representative, attach letter of authorization.

APPLICATION FORM FOR A USED OIL PROCESSING PERMIT

PART II - CERTIFICATION

Form 62-710.901(6) P. E. Certification [Complete when required by Chapter 471, F.S. and Rules 62 - 4.050, 62-761, 62-762, 62-701 and 62-710, F.A.C.]

Use this form to certify to the Department of Environmental Protection for:

1. Certification of secondary containment adequacy (capacity), structural integrity (structural strength), and underground process piping for storage tanks, process tanks, and container storage.
2. Certification of leak detection.
3. Substantial construction modifications.
4. Those elements of a closure plan requiring the expertise of an engineer.
5. Tank design for new or additional tanks.
6. Recertification of above items.

Please Print or Type

_____ Initial Certification _____ Recertification

1. DEP Facility ID Number: FLR000060301 2. Tank Numbers: See Attached

3. Facility Name: Safety-Kleen Systems, Inc.

4. Facility Address: 359 Cypress Road, Ocala, FL 34472

This is to certify that the engineering features of this used oil processing facility have been designed/examined by me and found to conform to engineering principles applicable to such facilities. In my professional judgment, this facility, when properly constructed, maintained and operated, or closed, will comply with all applicable statutes of the State of Florida and rules of the Department of Environmental Protection.

NDEyou

Signature

N.D. Eryou, PhD, PE

Name (please type)

Florida Registration Number: 46888

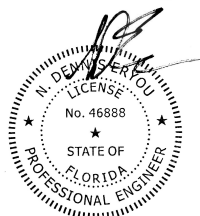
Mailing Address: 5051 Castello Drive, Suite 244

Naples FL 34103
City State Zip

Date: 1/24/2022 Telephone (516) - 449-58145

Email: dennis@eryouengineering.com

[PLEASE AFFIX SEAL]



Signature Authorization

SAFETY-KLEEN SYSTEMS, INC.

Consent Resolution of the Directors

June 18, 2014


The undersigned, being all of the Directors of Safety-Kleen Systems, Inc., a Wisconsin corporation (the "Company"), hereby consent to and adopt the following resolutions effective as of the above date.

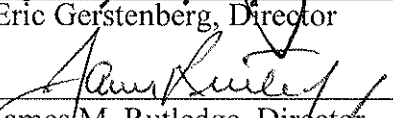
Resolved: That each individual with the title of President, Senior Vice President, Vice President, Director, Manager or Member of the Company, or any of its subsidiaries, shall have the power and authority to sign, certify, and deliver on behalf of the Company or any subsidiary, any necessary or desirable environmental documents, including, without limitation, any permit applications or amendments and any environmental reports in any way related to the operations of the Company or its subsidiaries. In addition to the foregoing, to the extent that the Company operates any facility with more than 250 people or having gross annual sales or expenditures in excess of the \$25,000,000, the General Manager of such facility shall have all of the foregoing authority with respect to the operations of any such facility.

Resolved: That the President, and any Senior Vice President, Vice President or Secretary or Assistant Secretary of the Company may designate an employee of an affiliated company to sign and certify, on behalf of the Company or any subsidiary, any necessary or desirable environmental documents, including, without limitation, any permit applications, transportation related documents and environmental reports in any way related to the operations of the Company or one of its subsidiaries.

Resolved: That the Secretary or any Assistant Secretary of the Company is hereby authorized on behalf of the Company to certify as to who are the officers of the Company and to the due authority of any officer or other person executing any of the foregoing documents or any other documents on behalf of the Company, and any governmental official or other third party shall be entitled to fully rely on any such certification.

WITNESS the execution hereof under seal as of the date first above written.


Eric Gerstenberg, Director


James M. Rutledge, Director