Andreyev Engineering, Inc.

ST. PETERSBURG OFFICE
3740 54th Avenue North
St. Petersburg, Florida 33714
727-527-5735

▼ Groundwater ▼ Environmental ▼ Geotechnical ▼ Construction Materials Testing

March 15, 2022
AEI Project No.: APEN-21-142

TO: **Environmental Administrator**
Hazardous Waste Program and Permitting, MS 4560
Department of Environmental Protection
2600 Blair Stone Road
Tallahassee, Florida 32399-2400

ATTEN: **Mr. Bheem Kothur**

SUBJECT: **Used Oil Processing Facility Permit Renewal Application**
Universal Environmental Services, LLC
509 South French Avenue, Sanford, Florida 32771
EPA Site ID# FLR 000050369
Permit # 266845-003-HO

Mr. Kothur:

At the request of Universal Environmental Services, LLC (UES), the attached permit application for the Used Oil Processing Facility Permit Renewal has been prepared and submitted for the purpose of renewing the existing Used Oil Processing Facility Permit. As you are aware, the ownership changed from Fuels Unlimited, Inc. to UES on December 7, 2018.

This revised permit application includes the information requested in FDEP's RAI issued February 7, 2022 including a tank integrity inspection performed in February, 2022. Also attached are two requested items formatted in Word.

If you have any questions regarding the information contained herein, please do not hesitate to contact the undersigned (727) 527-5735.

Sincerely,

ANDREYEV ENGINEERING, INC.

Jeffery E. Eller, P.E.
Principal Engineer
Florida Registration No. 57434

USED OIL PROCESSING FACILITY PERMIT APPLICATION

Part I

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

A. General Information

1. New_____ Renewal __X__ Modification _____ **Date current permit expires ___March 26, 2022__**

2. Revision number __1.0__

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)
__X_ Transporters (Subpart E)
_____ Burners of off-spec used oil (Subpart G)
__X_ Marketers (Subpart H)
_____ are disposing of used oil (Subpart I)

4. Date current operation began: ___January 1, 2006_____

5. Facility name: ___Universal Environmental Services, LLC _____

6. EPA identification number: ___FLR000050369_____

7. Facility Location:

__509 S. French Avenue, Sanford Florida 32771_____
Street City State Zip Code

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

___P.O. Box 259, Sanford Florida 32772_____
Street or P.O. Box City State Zip Code

9. Contact person: __Ms. Karen Violet_____ Telephone: 407-908-4493_____

Title: Assist. Operations Manager_____ Email: __kviolet@universalenviro.com_____

Mailing Address:
_____P.O. Box 259, Sanford Florida 32772_____
Street or P.O. Box City State Zip Code

10. Operator's name: ___Ronald C. Patterson_____ Telephone: _407-302-3193_____

Email: __cpatterson@universalenviro.com____

Mailing Address:
_____P.O. Box 259, Sanford Florida 32772_____
Street or P.O. Box City State Zip Code

11. Facility owner's name: Universal Environmental Services, LLC__ Telephone: __678-544-2915_

Email: _mschorr@universalenviro.com_____

Mailing Address:
_____411 Dividend Drive, Peachtree City, GA 30269_____
Street or P.O. Box City State Zip Code

12. Legal structure:
_____ Corporation (indicate state of incorporation) _____
_____ Individual (list name and address of each owner in spaces provided below)
_____ Partnership (list name and address of each owner in spaces provided below)
__X_ Other, e.g., government (please specify) __LLC, Delaware_____
_____ Individual, partnership, or business operating under an assumed name (enter the county and state where the name is registered) County_____ State _____

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

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_Jeffery E. Eller, P.E.____ Registration No. __57434_____

Telephone: _727-527-5735_____ Email: _jeller@andreyevengineering.com__

Mailing Address:
_____3740 54th Ave. N, Saint Petersburg, Florida 33714_____
Street or P.O. Box City State Zip Code

Associated with: __Andreyev Engineering, Inc. (AEI)_____

B. SITE INFORMATION

1. Facility location:
County: __Seminole_____
Nearest community:__Sanford_____
Latitude:_28 47' 27"__ Longitude: _-81 16' 22"_____
Section: _25_____ Township: _19S_____ Range: _30E_____
UTM # _____/_____/_____/_____

2. Facility size (area in acres): __0.39_____

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. **See Attach 2**

C. OPERATING INFORMATION

1. Hazardous waste generator status (SQG, LQG, etc.) __N/A___

2. List applicable EPA hazardous waste codes:

_____N/A, No Hazardous Waste Stored On-Site_____ _____
_____
_____
_____
_____

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 __1_____

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 ___2_____

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 ___3_____

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 __4____

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 __5_____

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 ___6_____

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 ___6_____

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 __7_____

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 __9_____

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 __8_____

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 __2-20-2021_____and was approved by the Department on __4-28-2021_____ . 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 4-28-2021. or

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

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: Universal Environmental Services, LLC_ EPA ID#__FLR 000050369_____

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

Ronald C Patterson on Behalf of U.E.S
Signature of the Operator or Authorized Representative*

__Ronald C. Patterson, Operations Manager_____
Name and Title (Please type or print)

Date: _03/14/2022_____ Telephone: __407-302-3193_____ Email: _cpatterson@universalenviro.com

* If authorized representative, attach letter of authorization.

APPLICATION FROM FOR A USED OIL PROCESSING PERMIT

PART II - CERTIFICATION

Form 62-710.901(6) Facility Owner Certification

Facility Name: Universal Environmental Services, LLC EPA ID# __FLR 000050369_____

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.

Michael Schorr Digitally signed by Michael Schorr
DN: cn=Michael Schorr, o=Universal Environmental Services, LLC, ou, email=mschorr@universalenviro.com, c=US
Date: 2022.03.15 12:22:28 -04'00'

Signature of the Operator or Authorized Representative*

_Michael Schorr, CHMM_____
Name and Title (Please type or print)

Date: _03/14/2022____ Telephone: 678-544-2915 Email: _mschorr@universalenviro.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: Universal Environmental Services, LLC EPA ID#__FLR 000050369_____

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.

Michael Schorr Digitally signed by Michael Schorr
DN: cn=Michael Schorr, o=Universal Environmental Services, LLC, ou, email=mschorr@universalenviro.com, c=US
Date: 2022.03.15 12:23:01 -04'00'

Signature of the Operator or Authorized Representative*

__Michael Schorr, CHMM_____
Name and Title (Please type or print)

Date: _03/14/2022_____ Telephone: _678-544-2915_____ Email: _mschorr@universalenviro.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 ___X_____ Recertification

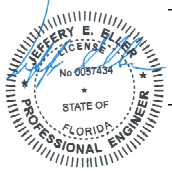
1. DEP Facility ID Number: _FLR 000050369_____ 2. Tank Numbers: _#1 thru #8_____

3. Facility Name: _Universal Environmental Services, LLC_____

4. Facility Address: __509 S. French Avenue, Sanford Florida 32771_____

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.

_____ _____
Signature



_Jeffery E. Eller, P.E._____ _____
Name (please type)

Florida Registration Number: __57434_____

Mailing Address: _3740 54th Avenue North_____
Street or P. O. Box

_Saint Petersburg_____FL_____ 33714_____
City State Zip

Date: __03/15/2022____ Telephone -727-527-5735___Email: _jeller@andreyevengineering.com___

[PLEASE AFFIX SEAL]

LIST OF ATTACHMENTS

LIST OF FIGURES

LIST OF FORMS

LIST OF APPENDICES

ATTACHMENT 1
DESCRIPTION OF FACILITY OPERATIONS

Facility Operational Information:

Universal Environmental Services (UES) purchased Fuels Unlimited Inc. on December 7, 2018. The previous owners of UES, Mr. Ronald C. Patterson and Ms. Karen A. Violet, are employees of UES with headquarters located in Peachtree City, Georgia. The subject facility was previously owned by Fuels Unlimited Inc. between January 1, 2006 and December 7, 2018. The owner before 2006 was Mr. William Patterson, who operated the facility as Oils Unlimited, Inc. Regarding the historical use of the subject site, it has been used as a bulk petroleum storage facility since the early 1920's. A petroleum release was reported by a previous owner, Harvey Oil, in November 1988. The petroleum release reported in November 1988 was determined to be eligible for the FDEP Early Detection Incentive (EDI) program. Site assessment (SA) activities were initiated under the FDEP LSSI program in late 2021.

This Used Oil Processing Permit Application has been prepared for Universal Environmental Services. The subject site contains approximately 0.39 acres, and is located at 509 French Avenue (also known as U.S. Highway 17-92), in Sanford, Seminole County, Florida. **Figure 1** shows the location of the subject site on the "Sanford" USGS Topographic Map. Universal Environmental Services is a company which collects and then re-refines the used oil at their modern oil re-refinery in Peachtree City, Georgia.

The Sanford UES location collects used oil, used oil filters, used antifreeze and oily water from various vendors in central Florida. The used oil is then shipped to the Peachtree City, Georgia re-refinery or other UES processing facilities. All used oil which is delivered to the site is tested for applicable criteria prior to acceptance. The used oil is typically picked up by a tanker truck owned and operated by UES. Occasionally used oil is brought to the Sanford UES facility by a vendor. The UES Sanford facility consists of a main office building, a spill control shed, an equipment storage shed, a used oil transfer area, and nine aboveground storage tanks (ASTs). **Figure 2** contains a site map which shows the office building, ASTs, and other applicable features. An aerial photograph showing the subject site relative to nearby properties is presented in **Figure 3**. The AST and piping layout is illustrated in **Figure 4.** Of the nine ASTs, eight ASTs (#1 through #8) are active, and are used as part of site operations. The eight active ASTs are located within a concrete containment structure and are connected with piping to a main loading area located to the southwest of the concrete containment structure.

Attachment 2 contains detailed information about where the used oil, the oily water, and recyclable coolant are transported for use or recycling. UES does not conduct any used oil processing on-site except for utilization of a canister filter and a pump on all trucks and on the loading rack for all oil transfer operations.

The UES Sanford facility is open from 8:00 am to 5:00 pm, Monday through Friday. As indicated in **Attachment 3**, all used oil which is delivered to the site is tested for total halogens prior to acceptance. Any used oil picked up by UES is tested for total halogens with a portable instrument and/or test kit for halogens by trained UES personnel. The eight active on-site Aboveground Storage Tanks (ASTs) are located within a concrete secondary containment structure and are connected with piping to a main loading/off-loading area located southwest of the concrete containment structure. Photographs of the subject site are included in **Appendix A**.

Secondary Containment: Secondary containment is provided for all of the active ASTs and piping, and loading-unloading areas on-site, and is shown on **Figure 2**, and in the photographs included in **Appendix A**. The active ASTs are located within a concrete floor and concrete block containment structure which has a capacity that exceeds 110% of the largest AST volume. AST #9 (2,000 gallon capacity) is inactive and pipes disconnected. Any water which accumulates within the main containment structure evaporates or can be pumped to oily water AST # 7. A summary of the containment systems in place for the subject facility is provided:

Tank/Piping	**Containment**
Eight Active ASTs	Eight ASTs are single wall tanks located within a secondary containment structure.
Aboveground piping	All piping is aboveground, and located above a secondary containment structure.
Loading-Unloading connections	Located within a secondary containment structure.

Employees: The UES-Sanford facility currently staffs five (5) employees, consisting of an Operations Manager, an Assistant Operations Manager, office staff and truck drivers.

Loading/Unloading Operations: According to UES personnel, there can be between 10 to 15 loading/unloading operations per week, and each operation takes from approximately 30 minutes to 1.5 hours. The three (3) Sanford-based trucks which pick up used oil from vendors and transport it to the UES-Sanford facility each hold up to a 2,800 gallon load plus a rack on the back of the truck that can hold up to seven (7) 55-gallon drums typically used to hold used oil filters. UES transports 6,500 gallon loads at a time, to the UES-Peachtree City facility, or to other UES processing facilities via tanker trucks with a volume capacity ranging from 8,450 to 9,000 gallons. Generally, at most one empty UES tanker is parked on-site. The tanker trucks are part of the pool of tanker trucks operated by the UES operations based in Peachtree City, GA. Typically two (2) 55-gallon drums are generated on site annually of non-hazardous solid waste including pads, rags, oil dry and oil filter debris, etc. These are transported to the UES-Peachtree City facility or other UES processing facilities for proper disposal.

UES also collects oily water, and recyclable anti-freeze. UES does not accept used oil which contains levels of halogens or metals above the acceptable criteria of 1,000 parts per million (ppm).

Facility Security: The entire facility is fenced, has adequate lighting and a video surveillance system. The facility lighting is sufficient for discovery if spills occur during hours of darkness and to minimize vandalism. The facility security is adequate with respect to the location and type of operation associated with the UES facility. The UES-Sanford facility is 9 blocks northeast of the Sanford Police/fire Station located at 815 Historic Goldsboro Blvd, Sanford, Florida.

Volume and Inventory and Control: The volume of used oil is inventoried on a daily basis using manual inventory control as the primary means of inventory control. The manual inventory control is provided by documenting incoming, outgoing, and static volumes on a daily basis for the ASTs. ASTs #1 through #6 are measured prior to receiving any used oil, and after removal of any used oil. AST #7 is measured prior to receiving any oily water, and after removal of oily water. AST #8 is measured prior to receiving any recyclable coolant, and after removal of recyclable coolant.

Surface Water Features: With respect to surface waters, UES is located in an urban area, and review of the USGS “Sanford” topographic map included as **Figure 1** indicates there are no mapped surface water features or wetlands within 1/4 mile radius of the site. The nearest surface water feature is Lake Monroe, located approximately 3,200 feet to the north.

Flood Zone: The location of the subject site was reviewed with respect to the 1995 Flood Insurance Rate Map. The subject site is located within “Zone X”, which is a 500-year flood plain designation, or areas of 100-year flood with average depths of less than 1 foot or with drainage areas less than 1 square mile; and areas protected by levees from 100-year flood. A copy of the Flood Zone map which shows the subject site is included in **Figure 5**.

Utilities and Drainage Features: With respect to site utilities and drainage features, the City of Sanford provides water and wastewater services to the subject site. The paved areas on-site consist of concrete pads with raised curbing, as shown in **Figure 2**. The remaining areas not occupied by the secondary containment structures and concrete pads are either grass or contain gravel. No stormwater catch basins, retention ponds or drainage swales are present on-site. The site is about 0.39 acres, and is relatively flat. The stormwater drainage is in all directions, depending on the specific location within the site. The nearest stormwater catch basins are located off-site, along French Avenue. One catch basin is located approximately 150 feet to the north, and the other is located approximately 150 feet to the south. The subject site does not contain an oil/water separator.

ATTACHMENT 2
DETAILED PROCESS DESCRIPTION

Universal Environmental Services, LLC (UES) operates a single used oil transfer facility, located at 509 French Avenue in Sanford, Florida, which is open for business five days per week, 8:00 am to 5:00 pm, Monday through Friday and operates typically 6:00 AM to 6:00 PM. The entire site is fenced, and is locked during non-operating hours. No used oil, oily water, or recyclable coolant are transferred during non-operating hours. The following detailed process description information is provided:

1. Used Oil On-Site Delivery and Pickup:

Used oil is obtained by UES by two methods. The first method, which is the primary method, is where used oil is picked up by UES drivers and transported to the subject site. The second method is where used oil is delivered to the facility by customers.

All tank truck loading/unloading procedures are conducted by or under the supervision of UES personnel. The hose connections for used oil, oily water and recyclable coolant loading and unloading operations are conducted within secondary containment at the UES facility***. Each driver must ensure that all hoses and pumps are connected and operated properly, and the driver must remain present at the truck at all times during loading and unloading operations.***

2. Oil Product Testing and Acceptance Procedures:

Customers Whose Used Oil is Picked Up by UES:

For customers whose used oil is picked up by UES, total halogen levels are determined either by the customer providing analytical results, or by testing by UES. For customers without analytical results, UES personnel screen the used oil to be picked up for total halogens using a CFC detection device (Model #TIFRX-1A) manufactured by TIF, (referred to hereafter as a "sniffer"), and/or test the oil using a portable testing kit (Clor-D-Tect 1000 halogen test kit) manufactured by Dexsil. Additional information regarding the testing procedure is provided in **Attachment 3** and halogen screening standard operating procedures are contained in **Appendix B**. If the field screening and testing, using the Chlor-D-Tect kit indicates that the total halogens exceed 1,000 parts per million (ppm), then the oil is determined to be contaminated and it will not be picked up or accepted by UES.

Customers Who Deliver Used Oil to the UES Facility:

For the customers who deliver used oil to the facility, a sample is collected from each delivery and tested for total halogens on-site prior to unloading using the halogen CFC detection device (model #TIFRX-1A), i.e. the "sniffer" manufactured by TIF and/or the Clor-D-Tect Chlorine Halogen test kit manufactured by Dexsil. The Clor-D-Tect test kit is routinely used to confirm new sources of used oil including oil for which the sniffer readings indicated elevated halogens. Additional information regarding the testing procedure is provided in **Attachment 3**. Once the halogen levels are determined to be acceptable by UES personnel, the product is suitable for transfer. In addition, some customers provide analytical laboratory results.

3. Transport of Used Oil by Tanker Truck:

Prior to shipment of each batch of used oil to the UES Re-refinery, or other UES processing facilities, each batch is sampled and analyzed to determine if it is meets the criteria for non-hazardous used oil, based on the parameters and criteria identified in **Attachment 3**. Halogen content must be less than 1,000 ppm to meet the criteria. Any laboratory utilized will be in the DOH Environmental Certification Program (ELCP) for the solid and chemical matrix for the analytical and test combinations to be performed. UES management receives and approves all laboratory analytical results before shipments to the Peachtree City re-refinery facility or other UES processing facilities may occur.

Once the used oil is determined to meet the halogen criteria, it is transported by UES drivers to the Peachtree City, GA re-refinery or other UES processing facilities. Upon arrival at the designated facility, the UES-Sanford driver coordinates with on-site UES personnel who collect a new sample from the tanker truck and test the used oil at their on-site lab. If the analytical results meet the criteria, the on-site UES personnel unload the used oil into an AST at the UES processing facility. A Non-Hazardous waste manifest is utilized for each delivery, and is retained by UES for three years.

4. Used Oil Processing

UES conducts a minimal amount of processing, which consists of the removal of particulates during the transfer process. The particulates are removed from the used oil during the transfer process with a steel/nylon filter/basket located on all tank trucks as well as in the loading/unloading area.

5. Oily Water

AST #7 is used for the storage of oily water, and is transported off-site as a non-hazardous waste for disposal to either Liquid Environmental Services Inc. or WRI, both located in Jacksonville, Florida.

6. Recyclable Coolant

AST #8 is used for the storage of recyclable coolant, and is transported off-site for recycling to On-Site Antifreeze Recycling in Fort Myers, Florida.

7. 55-Gallon Drums Containing Used-Oil Filters

Used oil filters are picked up from customers in 55-gallon drums and are stored in the metal storage building, which is shown in **Figure 2**. The 55-gallon drums containing the used oil filters are transported to other UES facilities for recycling or to a licensed facility in Medley, Florida where they are utilized in the manufacturing of manhole covers. Depending on the month, zero to 141 55-gallon drums of oil filters are transported off-site per month.

8. 55-Gallon Drums Containing Absorbent Materials

UES also accepts 55-gallon drums of non-hazardous absorbent materials, which are picked up and stored in the metal storage building, shown in **Figure 2**. All 55-gallon drums containing absorbent materials are verified as non-hazardous based on review of analytical results provided by the customers before they are accepted by UES. The 55-gallon drums of non-hazardous absorbent materials are transported either to an approved licensed designated facility or to a UES facility for proper disposal as non-hazardous waste.

9. Items Which Are Not Accepted by UES.

No hazardous waste is generated on site, accepted or transported by UES-Sanford.

10. Hazardous Waste Determination for Used Oil

No hazardous waste is generated on-site, or is accepted by UES-Sanford. However, in the unlikely event that any used oil is found to have been mistakenly accepted for transport to the UES-Sanford facility and this used oil cannot be managed for energy recovery or re-refining due to characteristic or listed hazardous waste properties, UES will conduct a hazardous waste determination, and the materials will be designated and managed in accordance with 40 CFR Part 279.10(c) and (e), as applicable.

ATTACHMENT 3
ANALYSIS PLAN

1. Product Analyses and Acceptance Procedures

For customers who deliver used oil to the facility, a sample is collected from each delivery and tested on-site for total halogens prior to unloading by means of a CFC detection device (model #TIFRX-1A) manufactured by TIF and/or a Clor-D-Tect Chlorine Halogen Dexsil test kit. **Appendix B** contains a copy of the Standard Operating Procedures utilized by UES for the CFC detection device (model #TIFRX-1A) manufactured by TIF and the Clor-D-Tect Chlorine Halogen Dexsil test kit. Each customer is aware that UES accepts only used oil which has a reading of less than 1000 ppm for total halogens.

Should an incoming delivery exceed 1000 ppm of total halogens, the delivery load is not accepted, and it is then removed by the customer. If the total halogen level is less than 1000 ppm, the delivery tanker is allowed to unload. All of the total halogen results for the on-site testing are maintained by UES personnel for at least three years.

2. Customers Whose Used Oil is Picked Up by UES

For customers who do not have analytical results for total halogens, UES personnel will test the load for total halogens with a CFC detection device (model #TIFRX-1A) manufactured by TIF, and/or a portable testing kit (Clor-D-Tect 1000 halogen test kit) manufactured by Dexsil. For customers who have analytical results which indicate that the used oil has a total halogen level less than 1000 ppm, the results are provided to the UES driver prior to pickup. If the analytical results indicate that the used oil has a total halogen level greater than 1000 ppm, then it is not picked up by UES. All of the total halogen test results provided to UES are maintained by UES personnel for at least three years.

3. Product Analyses Procedures By UES Prior to Transport Off-Site

As indicated in **Attachment 2**, once one or more of ASTs #1 through #6 used to store used oil are full, a sample is taken and sent to an in-house UES laboratory for analysis for the parameters listed below. If any of the parameters exceed the applicable levels listed below, it is determined to be “off-specification”, and which is then sent to a facility permitted to accept “off-specification” used oil.

Arsenic	5 ppm (maximum)
Cadmium	2 ppm (maximum)
Chromium	10 ppm (maximum)
Lead	100 ppm (maximum)
Sulfur	0.4% (maximum)
Flash Point	100 degrees, Fahrenheit (maximum)
Total Halogens	1000 ppm (maximum)
PCBs	2 ppm (maximum)
Halides	4,000 ppm (maximum)

4. Product Analyses Procedures for Oily Water and Sludge

If oily water or sludge generated at the facility cannot be managed for energy recovery, a hazardous water determination will be conducted and managed in accordance with 40 CFR, 279.10 (c) and (e).

5. Procedures to Prevent the Addition of Used Oil Once an AST Has Been Sampled

When an AST containing used oil is full and has been sampled, it is closed off from the piping network using the applicable valves. The particular AST which has been closed off after sampling will remain closed until the used oil is removed. Once an AST is full, a zip tie is used to ensure that no further oil deliveries are pumped to the AST.

6. Laboratory Information

Any laboratory utilized will be in the DOH Environmental Certification Program (ELCP) for the solid and chemical matrix for the analytical and test combinations to be performed. UES receives all laboratory analytical results before transporting the specific batch of used oil to other UES facilities.

ATTACHMENT 4
MANAGEMENT OF SOLID WASTE MATERIALS

Due to the type of operation conducted by UES, only a minimal amount of oil-contaminated solids and/or water containing used oil are generated on-site on an annual basis. The following summary information is provided.

1. Water in Used Oil:

No water is accepted from any customer who deliver used oil to UES-Sanford. In the event that water is present in a delivery to UES-Sanford, it is pumped into AST #7 and then is taken to a licensed water treatment facility for disposal.

2. Excess Used Oil in Hoses:

After transfer operations are complete, the remaining small amount of excess oil in the hose is contained in a plastic container which is located under the hose/valve connection to catch any drips during the disconnect or connection of the hose. Once the plastic container is full, it is pumped out by UES, as needed, and is pumped into a tank used to store used oil.

3. Absorbent Materials:

Approximately two 55-gallon drums of absorbent materials containing used oil and filter debris are generated annually. These drums are closed on-site in the metal storage building shown in **Figure 2**, and are transported off-site for disposal as a non-hazardous waste to a state certified disposal facility or another UES facility for proper disposal.

4. Water Which Accumulates in Loading Secondary Containment Area:

According to site personnel, the majority of water which accumulates in the loading secondary containment area evaporates. During the wet season, any excess water which does not evaporate is pumped out, and put in AST #7. The oily water is then disposed at a state certified treatment facility. According to site personnel, this is approximately 0 to 500 gallons per year. As a result, no stormwater is discharged off-site from the secondary containment area at any time.

ATTACHMENT 5
TRACKING PLAN

All incoming and outgoing deliveries are tracked by UES personnel using Non-Hazardous Waste Manifests. The following summary information is provided:

1. Product Receipt by UES

a) Upon delivery of used oil by a customer to the UES facility, a Receipt Manifest is filled out for each used oil delivery received by facility. The customer who provides the delivery is identified as the generator.

b) When used oil is picked up by UES a Receipt Manifest is filled out for each customer. A copy for each is left with the customer, and a copy is maintained in the UES office. The customer is identified as the generator, and UES is identified as the transporter and designated facility.

2. Product Delivery by UES

When UES-Sanford transports used oil to another UES facility a Delivery Manifest is filled out for each delivery. For this scenario, UES-Sanford is identified as the generator.

Each manifest receipt is retained on-site by UES personnel for at least 3 years as well as an electronic version stored in the UES computer database. Each manifest contains the applicable facility name, facility identification, address, drivers name, volume and destination.

ATTACHMENT 6
EMERGENCY PREPAREDNESS, PREVENTION & CONTINGENCY PLAN

Table of Contents

1.0 INTRODUCTION

1.1 Purpose

The goal of this emergency preparedness and contingency plan is to minimize hazards to human health and the environment from fires, explosions, or any unplanned sudden or non-sudden releases to soil on-site and in the immediate vicinity of the subject site. No surface water features are present within a ½ -mile radius of the subject site. The provisions of this plan will be carried out whenever there is fire, explosion, or release of used oil, which could threaten human health or the environment. A copy of this plan and any revisions will be maintained at the facility and submitted to local police, fire department and hospital, that might be called upon to provide emergency services.

1.2 Areas of Concern

- Spills Associated with Loading and Unloading of Used Oil
- Spills Associated with Transportation of Used Oil
- Release of Used Oil in ASTs Stored On-Site
- Fires, and Incidents Which Result in Injuries to Site Personnel

Responsibilities

The Primary Incident Coordinator (PIC) must be familiar with this contingency plan, operations and activities at the facility, including the location and characteristics of used oil, the location of records, and the facility layout. The PIC of his/her designee is responsible for modifying this plan, as needed, to reflect changes in facility operations and/or county, state, or federal regulations. The PIC is responsible for ensuring that UES employees are familiar with the content of this plan and are able to implement it, if needed, and responsible for ensuring that this plan is posted and accessible to UES employees. The PIC is responsible for implementing the plan in the event of an emergency and/or accidental release of used oil. In the absence of the PIC, the Secondary Incident Coordinator (SIC) will be responsible for implementation. The SIC must be familiar with this Plan, to the same extent as the PIC. The PIC or his/her designee is responsible for

modifying this plan, as needed. For this contingency plan, the PIC is Mr. Ronald Patterson, and the SIC is Ms. Karen Violet.

After any emergency or spill event where this contingency plan is implemented, this contingency plan shall be reviewed and revised as necessary in the event of the plan's failure, the lack of pertinent information within the plan or any other identified problem associated with the plan. The responsibilities of the PIC and/or SIC are as follows:

Response: Respond to any emergencies that may arise. Use established response protocols in response to the specific incident, and summon aid as necessary. Evacuate the facility if required. Implement the spill response procedures for a used oil spill as summarized in Section 4 below.

Notification: Provide the required notification of the applicable Federal, State and Local Agencies as summarized in Section 5 below.

Authorization to Commit Necessary Resources

The PIC and/or SIC are authorized to commit the necessary resources during an emergency, and at least one coordinator is always on-site or on call and can reach the facility on short notice during an emergency. In addition, after an emergency, the PIC and/or SIC and alternate SIC will provide for proper management of recordable waste, contaminated soils or other debris, and any contaminated surface or groundwater.

Figure 6 contains specific items applicable to this Emergency Preparedness, Prevention and Contingency Plan. **Figure 7** shows the aboveground piping for the ASTs.

2.0 SITE INFORMATION

Facility Name:	Universal Environmental Services, LLC (UES)
Location:	509 South French Avenue, Sanford, Seminole County, Florida
Telephone:	(407) 302-3193
Cell Number for PIC:	(407) 908-4140, Ronald C. Patterson
Cell Number for SIC:	(407) 908-4493, Karen Violet

Facility Activities and Personnel:

UES is a marketer of used oil. Used oil is either picked up by tanker/tank truck owned and operated by UES or used oil is brought to the facility by licensed used oil transporters. UES transports the used oil to other UES facilities for processing. UES-Sanford currently staffs five (5) employees, consisting of an Operations Manager, Assistant Operations Manager, office staff, and truck drivers.

UES does not conduct any processing of used oil on-site, and is open from 8:00 a.m. to 5:00 p.m., five days per week. All used oil which is delivered to the site is tested for applicable criteria prior to acceptance. Any used oil picked up by UES is checked for the presence of halogens using a CFC "sniffer" and/or a portable kit for halogens by UES personnel.

ASTs: Eight active and one in-active ASTs are located within a large secondary containment Structure. The used oil is stored in the six active ASTs on-site. AST #7 is used to store oily water

and AST #8 is used to store recyclable coolant. The eight ASTs are connected with piping to a main loading area located to the southwest of the concrete containment structure.

Secondary Containment: Secondary containment is provided for all of the active ASTs as shown in **Figure 6**. **Figure 7** shows the piping layout and all piping is above the secondary containment structure.

Site Utility and Drainage Information: The subject site utilizes water and wastewater services provided by the City of Sanford. No stormwater catch basins or retention ponds are on-site. No stormwater drainage ditches are present on-site. The nearest stormwater catch basins are located off-site, approximately 150 feet to the north, and south, along U.S. Highway 17-92. All stormwater which accumulates within the secondary containment area either evaporates, or is pumped into AST #7. As a result, no stormwater is discharged off-site from the secondary containment area.

Surface Water Features: With respect to surface water features, UES is located within an urban area, and review of the USGS "Sanford" Topographic Map indicates that no surface water features or wetlands are located within a ¼ mile radius of the subject site. The nearest navigable surface water feature is Lake Monroe, which is located approximately 3,200 feet to the north.

Adjacent Off-Site Properties: The adjacent off-site properties are as follows:

North: A small retail building which contains two tenants is present immediately to the north. The tenants includes a guns and ammunition store and a sign shop.
South: Railroad tracks are located immediately to the south. An automobile sales facility identified as Flag Auto Sales is located to the south of the railroad tracks at 601 South French Avenue.
East: A building utilized by Kerns Transmission is located immediately to the east.
West: South French Avenue, also known as U.S. Highway 17-92, is located immediately to the west. A car lot is located further to the west at 508 South French Avenue.

Potential Chemical Exposure Information:

The types of material on-site that UES employees may be exposed to is used oil, recyclable coolant, oily water, and used oil filters. Each employee receives chemical-specific training on the hazards of these chemicals. No other chemicals are stored or utilized on-site by UES.

3.0 SPILL PREVENTION, POTENTIAL SPILL SCENARIOS AND EMERGENCY PREPAREDNESS

Spill Prevention Measures: Prevention of spills is accomplished through the use of secondary containment structures, careful handling of the used oil, frequent inspection of transport systems, the ASTs, aboveground piping, and strict observation of safety during product transfers. The operations are reviewed in terms of existing procedures and spill potential. The following items apply to the UES facility:

***General Spill Prevention Measures*:**

- Drivers are responsible for the guarding against overfilling tanks.
- Tanks are considered full at 90% of total volume.
- Pumps must be attended while in operation.

- Pumps, pipes, hoses, gaskets and connections are inspected for wear by the responsible employee.
- Any residual amount of used oil in the transfer hose is placed into a plastic container which is pumped out when full.
- All ASTs and piping are located within secondary containment, and the pump and hose connection for all loading/unloading operations is located within a secondary containment structure.

***Prevention and Protective Measures*:**

- Inspections are conducted daily, monthly and annually by UES personnel
- Proper and safe work behavior practices are emphasized.
- Provision and use of proper equipment and facilities are emphasized.
- Continual assessment of potential hazards are conducted and emphasized.
- Effective training is utilized for employees.
- Communication between all applicable parties is emphasized.

Potential Spill Scenarios: The following potential spill scenarios for the subject site are summarized as follows:

Potential Event	**Volume (gallons)**	**Spill Rate**	**Potential Flow Direction**
Complete failure of one of the largest ASTs	1 to 20,490	A	Release will be contained within containment structure.
Partial failure of one of the largest ASTs	1 to 20,490	A to B	Release will be contained within containment structure.
Product transfer pipe failure	1 to several gallons	C	Release will be contained within containment structure.
Leaking product transfer piping	1 to several gallons	D	Leakage will be contained within containment structure.
Tank overfill-reverse of pumps	1 to several gallons	C to D	Release will flow to southeast, and west, on gravel surface. A containment wall on the western boundary prevents any off-site migration to South French Avenue.
Hose leak during truck loading	1 to several gallons	D	Leakage will be contained within containment structure.
Failure of two 55-gallon drums	1 to 110	A to B	Leakage will be contained with containment structure.
Spill Rate: A = Instantaneous; B = Gradual to instantaneous; C = 4 gallons per second; D = Up to 1 gallon per minute			

Emergency Preparedness:

***Fire Control Systems*:**

Three dry chemical fire extinguishers are present on-site- One is in the office building, one is located in the storage area in the eastern portion of the office building, and one is located on the active loading area, as shown on **Figure 6, Attachment 6, Contingency Plan Site Map.** The fire extinguishers are maintained under an annual contract with Tri-County Fire Equipment. With respect to fire hydrants, on September 2, 1995, the City of Sanford Fire Department issued a Pre-Fire Plan for the subject site, and indicated that the primary hydrant is located approximately 480 feet to the northeast of the subject site. The secondary hydrant is located approximately 454 feet to the south.

***Emergency Communication*:**
There are three telephones in the main office building. All operating personnel have cellular phones. Visual and voice warnings will be used to notify on-site personnel of an on-site emergency during working hours, and telephones will be used to contact either the PIC, SIC, and the applicable emergency response agency. Telephone communications will be used to contact the PIC and SIC regarding emergencies during non-working hours. The updated SPCC plan is included with this application and lists telephone numbers for the headquarters of UES.

Available Cleanup Equipment:

The following equipment, and the quantities of each item specified below, is maintained by UES in the metal storage building, which is shown in **Figures CP-1 and CP-2** for spill response:

- 4 absorbent booms
- 25 absorbent pads
- 4 heavy duty plastic garbage bags
- 4 pairs of plastic or vinyl gloves
- 2 55-gallon recovery drums
- 4 shovels

Additional spill cleanup equipment can be purchased from the following vendor:
Breg International (800) 433-1013

The UES PIC and/or SIC is responsible for purchasing and maintaining spill control equipment and supplies.

4.0 CONTINGENCY PLAN IMPLEMENTATION AND REPORTING CRITERIA

This section contains contingency and response procedures for the UES facility at 509 S. French Avenue, Sanford, Seminole County, Florida. This section also contains the criteria which requires implementation of the contingency plan. The criteria for implementation of the contingency plan is based upon applicable U. S. Environmental Protection Agency (EPA) and FDEP criteria.

Fire, Explosion and Injuries:
In case of a fire, an explosion, or significant injuries to site personnel, the Fire Department will be contacted immediately by dialing 911. If there are injuries, EMS can also be contacted by *dialing 911.*

Spill Reporting Limits
With respect to reporting limits for oil spills pursuant to U.S. EPA criteria, it is important to determine if a spill will affect “waters of the U.S.”, or is classified as an “island spill”. With respect to a *discharge* of oil products, the U.S. EPA defines “discharge” in the Clean Water Act as any spilling, leaking, pumping, pouring, emitting, emptying, or dumping that enters the waters of the U.S. or the adjoining shorelines in harmful quantities.

U.S. EPA Criteria – Waters of the U.S.

The U.S. CPA considers a "harmful quantity of oil" (25 gallons or more) to be a discharge that results in a violation of applicable water quality standards causes a film or sheen upon the water or adjoining shorelines, discolors the water or adjoining shorelines or causes an emulsion or sludge to be deposited beneath the surface of the water or upon adjoining shorelines. Navigable "waters of the U.S." include interstate waters, interstate wetlands, intrastate lakes, rivers and streams that are utilized by interstate travelers for recreational or other purposes and intrastate lakes, rivers, and streams from which fish or shellfish are taken and sold commercially.

The subject site is located within an urban area, and no navigable waters of the U.S. are located within a ½ mile radius. The nearest navigable water of the U.S. to the subject site is Lake Monroe, which is located approximately 3,200 feet to the north of the subject site.

U.S. EPA Criteria – Inland Oil Spills

According to the U.S. EPA, inland oil spills are classified into three categories, as follows:

Major – greater than 10,000 gallons
Medium – greater than 1,000 gallons and less than 10,000 gallons
Minor – less than 1,000 gallons

With respect to implementation of this Contingency Plan, any spills or incidents that may occur at the UES facility will be for inland spills only.

Contingency Plan Implementation

Used Oil Spills:
With respect to implementation of this Contingency Plan, any spills that may occur at the UES facility will be inland oil spills. For inland oil spills, the spill limit is 25 gallons of oil and/or fuel for implementation of this contingency plan. The following scenarios apply:

If the spill is less than 25 gallons on an impervious surface (such as concrete), without any part of the spill entering drainage structures, ditches, culverts, sanitary sewer pipes, immediate cleanup is required as specified in Section 5, and local agency notification is not required.

If the spill is greater than 25 gallons, or if the spill enters drainage structures, ditches, culverts, sanitary sewer pipes, immediate cleanup is required, and the notification procedures identified in Section 5 must be implemented.

5.0 INCIDENT NOTIFICATION AND IMMEDIATE RESPONSE ACTIONS

In the event any unplanned, sudden or non-sudden release of oil to the environment, the provisions of this plan must be carried out by the PIC or SIC. The PIC or SIC will determine if the emergency requires assistance from Federal, State or Local agencies. If agency assistance is needed, the PIC or Designee shall notify the agency with the following information:

1. Time and type of emergency
2. Location
3. Name and quantity of material(s) involvement
4. Type of service needed
5. The possible hazards to human health or the environment

The following items will be implemented by the PIC or SIC:

1. Provide a site layout, description of oil properties and associated hazards (MSDA), and appropriate emergency and evacuation plans.
2. Consult with emergency response teams to determine if agreement between the primary and supporting personnel are necessary.
3. Document all agreements/refusals.

Incident Notification Numbers

In the event of a fire, emergency resulting in injury to site personnel, a spill greater than 25 gallons, or if a spill less than 25 gallons enters a storm sewer or moves off-site, the UES PIC or SIC of the facility will notify the following, depending on the specific incident or situation.

- National Response Center	800-424-8802 202-267-2675
- U.S. EPA Region 4	404-562-1754 800-242-1754
- State of Florida Warning Point (24-hour number)	800 320-0519 850 413-9911
- Sanford Fire Department	911
- Florida Department of Environmental Protection	(407) 897-4100
- Seminole County Emergency Management	(407) 665-5100
- Petrotech Southeast, Emergency Contractor	(407-656-8114
- Andreyev Engineering, Inc.	(407) 330-7763 (727) 527-5735

Petrotech Southeast provides emergency response services and maintains the necessary equipment and materials for spill response activities. Andreyev Engineering, Inc. is an environmental engineering consulting company that can provide technical assistance to UES as needed.

Fire, Explosion and Injuries:

In case of a fire, explosion, or significant injury, the Sanford Fire Department will be contacted immediately by dialing 911. If there are injuries, EMS can also be contacted by dialing 911. The nearest hospital is approximately one mile from the site:

Central Florida Regional Hospital
1401 West Seminole Boulevard, Sanford, FL
(407) 321-4500

Evacuation Routes:

With respect to evacuation of the subject site in the event of an emergency, the subject site has only one entrance. The entrance is located on the southwest portion of the subject site, as shown on **Figure 6**. The subject site contains approximately .39 acres, and the evacuation routes include exiting the facility as shown in **Figure 6**.

Spills Less Than 25-Gallons:

In the event of an oil spill in a discharge less than 25 gallons, (and does not enter drainage structures or move off-site), the following immediate response actions should be taken in the following order by UES personnel at the scene:

Stop or shut off leak, if possible
Immediately notify the PIC or SIC
Restrict traffic from entering the spill area
Use absorbent booms to prevent spill from moving off-site
Control access to the spill site
Ensure that no ignition sources are present or allowed into the spill site
Initiate cleanup and removal actions as needed and/or possible

Spills Greater Than 25-Gallons

In the event of an oil spill resulting in a discharge of 25 gallons or more (or if the spill enters stormwater drainage, ditches, culverts, sanitary sewer pipes, or moves off-site), the following immediate response actions should be taken in the following order by UES at the scene:

Stop or shut off leak, if possible
Contact local fire department and State Warning Point
Immediately notify the PIC or Sic
Control access to the spill site
Restrict traffic from entering the spill site
Use absorbent booms to prevent spill from moving off-site
Control access to the spill area
Ensure that no ignition sources are present or allowed into the spill site
Contact designated spill response contractor
Do not risk human life or health in an attempt to control a spill

Disposal Procedures for Recovered Used Oil:

In the event of a spill or release of used oil, UES and/or its designated spill contractors(s) will insure the proper and adequate disposal of all recovered used oil materials in accordance with applicable Federal, State and local requirements. This included proper disposal of water containing used oil, used oil contaminated with water, and soil which contains used oil.

Cleanup Contractors:

The local fire department will provide emergency response assistance. In addition, Petrotech Southeast has been selected to provide emergency spill response service, as identified in other section of this emergency plan.

Equipment Decontamination:

All equipment in the emergency response action will be decontaminated with an appropriate compatible solution before the articles leave the work area. Equipment contaminated with used oil should be cleaned using a surfactant and water solution designed to remove used oil. The PIC is responsible to assure the affected items are clean and the above-mentioned Decontamination procedures are performed. Damaged tanks, pipes, drums, etc. will be repaired or replaced with the equivalent equipment that meet or exceed the original design specifications, when applicable.

Off-Site Emergency Response Procedures During Transport:

In the event a tanker utilized by UES is in an accident, or a spill occurs at a facility where used oil is being picked up from: the following items apply:

1. The UES driver will assess the situation, and will contact the PIC using the telephone numbers provided in this plan.
2. If the emergency warrants an immediate response by outside agencies, the driver will contact the appropriate agency using the telephone numbers provided in this plan.
3. The driver will set up absorbent material in front of any sewer drains and/or grassy areas to prevent oil from spreading to those areas.
4. The driver will document the incident as noted in this plan, and provide the information to to the PIC or SIC. The PIC will submit the information concerning the incident to the applicable agencies.

6.0 DOCUMENTATION AND RECORD KEEPING

Spill Event and/or Incident Documentation & Reporting

Documentation of the spill incident, or fire or explosion is the responsibility of the UES PIC or SIC, and will include:

- Chronological log of events and communication during the incident
- Description of response actions and their effectiveness
- Photographs of the incident

State and Local Agency Reporting

The UES PIC or SIC will provide documentation for the spill incident to the appropriate regulatory agencies. This information will include the following, as applicable:

Name, address, location and telephone number of the facility
Name, address, location and telephone number of the owner/operator
Name, title and telephone number of the person reporting the spill or incident
Date, time and type of incident
The extent of injuries, if any
Spill location within the facility and volume/quantity of spill
Type of material used
Corrective actions taken
Media affected (soil, groundwater, surface water, sediment, etc.)

The written record of all pertinent information to the local, state, and/or federal agencies, and the agencies response are to be retained by the PIC or SIC.

Arrangements with Local Authorities

Arrangements with authorities are established by providing appropriate agencies with a copy of the plan and a letter requesting their assistance in the event of an emergency. In the event revisions to this plan are made, a revised copy will be submitted to the referenced agencies. A copy of this plan has been provided to the following:

Sanford Fire Department

Provides fire fighting and spill response capability for any fire, release and explosion.
Provides rescue and emergency medical assistance for employees, if necessary.

Sanford Police Department

Provided traffic and crowd control outside the facility and assure free access for fire. Equipment, ambulances and emergency response vehicles.
Assist in the evacuation of the surrounding areas if the emergency situation warrants.

Central Florida Regional Hospital

Provides medical services and treatment for individuals suffering injuries or illness as a result of an emergency incident on-site.

Amendments to Contingency Plan

This plan will be revised in accordance with the following criteria:

- applicable regulations or ordinances are revised
- the facility makes significant changes in operations
- the plan fails in an emergency
- the facility changes in a manner that materially increases the potential for fires, explosions, or
- the release of hazardous materials/waste, or change the response necessary in an emergency
- The PIC or SIC changes or the list of emergency equipment changes.

PHONE NUMBERS OF LOCAL AUTHORITIES AND AGENCIES		
Sanford Fire Department	911	Primary contact number for Spill, Fire, Explosion or Emergency
Sanford Police Department	911	Primary contact number for Spill, Fire, Explosion or Emergency
State of Florida – Warning Point	800-320-0519 850-413-9911	Primary contact number for Spill, Fire, Explosion or Emergency
FDEP Central District Office, Orlando	407-897-4100	Business Hours Number – Non-Emergency Number
Seminole County Emergency Management	407-665-5100	Business Hours Number – Non-Emergency Number
EPA Region 4, Atlanta GA	404-562-8700	8:00 AM – 5:00 PM
Central Florida Regional Hospital, Sanford	407-321-4500	Nearest hospital to facility
National Response Center	800-424-8802 202-267-2675	Alternate Contact Number for Spills and Emergencies (**24 hour**)
Florida Poison Information Center	800-222-1222	24 hour number for assistance for poison incidents
ChemTrec	800-424-9300	24 hour number for assistance regarding chemical exposure
PetroTech Southeast	407-656-8114	Emergency Response Contractor

ATTACHMENT 7
UNIT MANAGEMENT DESCRIPTION

The UES facility consists of a main office building, a spill control shed, an equipment storage shed, a used oil transfer area, and nine aboveground storage tanks (ASTs). **Figure 2** contains an aerial photograph of the facility. Of the nine ASTs, eight ASTs (#1 through #8) are active, and are used as part of the site operations. AST #9 is inactive, and is not used as part of site operations. The nine ASTs are summarized as follows:

Tank Type	Size (gallons)	Date Installed	Product Type	Secondary Containment	Piping Position	Piping	Leak Detection
AST #1	17,740	1920's	Used Oil	Yes – Concrete containment structure	Above Ground	Single Wall	Visual
AST #2	17,740	1920's	Used Oil	Yes – Concrete containment structure	Above Ground	Single Wall	Visual
AST #3	17,740	1920's	Used Oil	Yes – Concrete containment structure	Above Ground	Single Wall	Visual
AST #4	17,740	1920's	Used Oil	Yes – Concrete containment structure	Above Ground	Single Wall	Visual
AST #5	20,490	1981	Used Oil	Yes – Concrete containment structure	Above Ground	Single Wall	Visual
AST #6	20,490	1981	Used Oil	Yes – Concrete containment structure	Above Ground	Single Wall	Visual
AST #7	5,000	1998	Oily Water	Yes – Concrete containment structure	Above Ground	Single Wall	Visual
AST #8	5,000	1998	Recyclable Coolant	Yes – Concrete containment structure	Above Ground	Single Wall	Visual
AST #9	2,000	1998	Not Used	Yes – Concrete containment structure	Above Ground	No piping	N/A

ASTs: There are eight active ASTs (ASTs 1 through 8 and one inactive AST (AST #9), which are all located within a secondary containment structure. The used oil is stored in ASTs #1 through #6, AST #7 is used to store oily water, and AST #8 is used to store recyclable coolant. All eight ASTs are connected with aboveground piping to a main loading area located to the southwest of the concrete containment structure. AST #9 is in-active, and is not connected to any piping, and is not utilized as part of site operations. **Figure 2** contains a site map which shows the locations of the ASTs. The main loading/unloading area under the metal canopy is for ASTs #1 through #6, which are the main ASTs utilized for site operations. ASTs #7 and #8 are loaded/unloaded from the south side. The ASTs are labeled according to tank schedule. Additional information for the active ASTs is provided as follows:

Construction Dates: ASTs 1 through 4 were constructed in the 1920s. ASTs 5 and 6 were constructed in 1981. ASTs 7, 8 and 9 were constructed in 1998.

Structural Support: ASTs 1 through 4 are horizontal tanks, and have steel beams for structural support. ASTs 5 and 6 are horizontal tanks, and have concrete saddles for structural support. ASTs 7 through 9 are vertical tanks, and do not have any vertical support structures.

Secondary Containment: Secondary containment is provided for all of the active ASTs and piping, and loading-unloading areas on-site, and is also shown on **Figure 2**, and in the photographs included in **Appendix A**. The eight active ASTs are located within a block containment structure

which has a capacity of approximately 56,540 gallons, which exceeds 110% of the largest AST, which is 20,490 gallons. Secondary containment volume calculations are presented in Appendix C. The following summary of the containment systems in place for the subject facility is provided as follows:

Tank/Piping	Containment
Eight Active ASTs	All eight ASTs are single wall tanks located within a secondary containment structure.
Aboveground piping	All piping is aboveground, and located above a secondary containment structure.
Loading-unloading connections	Located within a secondary containment structure

Piping: The piping is all above-ground, and consists of steel pipes and welded joints. ASTs #1 through #6 have 3-inch piping, and ASTs #7 and #8 have 2-inch piping. AST #9 does not have any piping and is not in use. **Figure 4** shows the piping layout. Photographs of the piping are included in **Appendix A**, and piping is inspected as indicated below.

55-Gallon Drums: The subject site utilizes 55-gallon drums for the storage of used oil filters, which are stored in the spill control building. These 55-gallon drums are transported to other UES facilities for proper disposal or to a licensed facility, where they are utilized in the manufacturing of manhole covers. Approximately zero to 141, 55-gallon drums are transported off-site per month.

Management of Stormwater Accumulation in AST Secondary Containment Structure: According to site personnel water which accumulates within the main containment structure as a result of rainfall evaporates. Site personnel indicated that no stormwater has ever been discharged or released from the secondary containment area to the subject site, or off-site.

Management of stormwater Accumulation in AST Loading/Unloading Secondary Containment Structure: According to site personnel, the majority of water which accumulates in the loading secondary containment area evaporates. During the wet season, any excess water which does not evaporate is pumped out, and put in AST #7. The oily water is then disposed at a state certified treatment facility. According to site personnel, this is approximately 0 to 500 gallons per year. No water from the loading/unloading secondary containment area is discharged or released to the subject site or off-site.

Facility Inspection Procedures: The inspection procedures conducted by UES consist of daily, monthly, and annual inspections. Any written records generated as part of the inspections conducted pursuant to this permit are to be retained for a period of three years, and are readily available for regulatory officials during an inspection. Specific information is provided as follows:

Daily Visual Inspections: Daily visual inspections consist of inspection of the ASTs, piping, the secondary containment structure, and the loading areas to check for tank damage or leakage. In addition, the outside of the containment structure is inspected for signs of deterioration. If any deficiencies are noted as a result of any daily inspections, the following items apply:

- The Operations Manager of UES is to be notified immediately. The Operations Manager will evaluate the deficiency with respect to the criteria for response procedures, contained in **Attachment 6**.

- Applicable corrective actions, if warranted, are to be implemented.

Monthly Inspections: Monthly inspections are performed and documented by the UES Operations Manager or Assistant Operations Manager. Monthly inspections are documented in a written log and the following items are included:

- All ASTs are checked monthly for the presence of water at the lowest possible points inside the tank and water found is removed. Any water removed is handled as discussed in other sections of this permit application.

- All ASTs are inspected monthly for visual evidence of leaks, or damage to the ASTs.

- The containment structures are inspected monthly for damage or other items which would reduce the effectiveness of the containment structures.

- All aboveground piping and valves are inspected for visual evidence of leaks or damage.

Annual Inspection: On an annual basis, all O-ring gaskets of the emergency vents are checked, and the tank supports, anchor bolts, and foundations are checked for signs of damage, deterioration or settlement.

A copy of the inspections logs for the monthly and annual inspections in 2019 through 2021 are included in **Appendix D**.

Procedure for Checking for Water in the Tanks: UES tanker/tank trucks each have two compartments which allow each driver to separate water from used oil at the time of initial pick up. Once at the facility, the driver checks each used oil compartment in the tanker for the presence of water prior to pumping the ASTs. This procedure is effective in keeping the majority of any oily water out of the used oil ASTs.

In addition, UES personnel check the ASTs for the presence of water in the ASTs weekly.

Special Inspections: A special tank systems integrity assessment was performed February 21 – 24, 2022 by Mr. Rick George, STI Inspector No. AST-1881 employed by UES. Mr. George conducted inspections of each of the eight in-use tanks and tank No. 9 which not in use. He used ultrasonic testing of tank metal thickness. He also conducted pit testing and ground resistance testing of each tank. According to the summary report, ASTs #1 through #9 were in fair to good condition and suitable for service. Also in the report dated March 4, 2022 Mr. George gave recommendations for regular maintenance to impede corrosion and future inspections. A copy of the March 4, 2022 report is included in **Appendix E**.

ATTACHMENT 8
CLOSURE PLAN

1. Closure Plan Criteria:

This closure plan for UES has been prepared in accordance with Chapter 62-710.800(5), which requires the following:

a) There will be no need for further facility maintenance.
b) Used oil will not contaminate surface or groundwater.
c) All tanks, piping, secondary containment, and ancillary equipment will be emptied, cleaned and decontaminated and all materials removed and managed.
d) The closure plan shall be updated whenever significant operations changes occur or design changes are made.
e) The owner or operator shall submit a detailed closure plan to the Department at least 60 days prior to the scheduled date of closing the facility.
f) Within 30 days after closing the facility, the owner or operator shall submit a certification of closure completion to the Department which demonstrates that the facility was closed in accordance with its closure plan, the Department shall release the facility from its financial assurances obligations.
g) The owner or operator shall estimate the costs of closing the facility Form 62-710.901(7). The owner or operator shall continue to annually adjust the closing cost estimate for inflation and changes in the closure plan, and shall submit updated information to the Department between January 1 and March 1 of each year.

2. Specific Closure Plan Activities

a) All used oil, recyclable coolant, and oily water will be removed from the ASTs at the facility and either sold, or disposed of at an approved facility.
b) All sludge will be removed from each AST, which will be sampled, and disposed of as a non-hazardous waste.
c) All ASTs will be decontaminated by entering each AST and pressure washing each AST. All piping will be decontaminated by pressure washing. All wash water from the ASTs and piping will be removed via the existing piping network, placed in a tanker, and transported off-site for disposal at an approved facility.
d) The secondary containment area beneath the ASTs and the loading/unloading area will be decontaminated by pressure washing as needed. All wash water from the decontamination of the secondary containment area will be recovered by vacuum truck and transported off-site for proper disposal.
e) In order to demonstrate clean closure, it is proposed that soil and groundwater sampling in accordance with FDEP Closure Assessment requirements be conducted. Initially, five soil borings will be installed and the samples will be examined for visual evidence of used oil contamination. Based on the results of the visual examination, three samples will be collected for laboratory analyses. Three groundwater samples will also be collected from these locations. The soil and groundwater samples will be collected in accordance with the procedures contained in DEP-SOP-001/01. The samples will be analyzed for used oil parameters including EPA Method 8260 and 8270 parameters. Total Petroleum Hydrocarbons (TPH), and arsenic, cadmium, chromium, and lead. The laboratory analyses will be conducted by a laboratory certified by the Florida Department of Health, and NELAC certified. Groundwater

samples will be obtained by installing three monitoring wells to a depth of approximately 14 feet, which will be screened from 4 to 14 feet below land surface. A Closure Report will be submitted to the Department, which will summarize the soil and groundwater sampling activities, and laboratory analytical results.

3. Closure Cost Estimate

The estimated closure cost for UES was calculated and submitted to the FDEP on February 20, 2021, using FDEP Form #62-710-901(7), effective December, 2019. A letter dated April 28, 2021 from Susan Eldredge, with FDEP Solid Waste Financial Assurance confirmed that financial guarantee for the UES facility is in compliance with the requirements of 40 CRR Part 264, Subpart H and Rule 62-701.630 F.A.C. at this time. The owner/operator will annually adjust the closing cost estimate for inflation and changes in the closure plan, and will submit updated information to the FDEP between January 1 and March 1 of each year.

4. Schedule for Closure

a) Submit detailed Closure Plan to the Department 60 days prior to closure.
b) Remove used oil in the ASTs by selling it to customers.
c) Remove all sludge from ASTs.
d) Decontaminate ASTs, piping, and secondary containment areas.
e) Conduct closure assessment activities.
f) Submit Closure Assessment Report to the Department within 30 days after completion of closure activities.

ATTACHMENT 9
TRAINING

1. UES Employees:

The following training applies to UES employees:

a) UES Truck drivers are required to have valid "CDL" driver's licenses prior to employment. Any new personnel involved in the driving of used oil will receive a briefing on the applicable laws and rules before unsupervised driving of a used oil transportation vehicle.

b) Any new personnel involved in the handling of used oil will receive a training on facility procedures, management practices, spill prevention, safety, and spill response procedures prior to initiation of duties.

c) Any new personnel involved in the handling of used oil will receive a training on compliance with state and federal rules governing used oil prior to the initiation of duties.

d) Any new personnel involved in the collection of used oil will receive a detailed training regarding the UES's standard operating procedures for halogen screening at each pick up location. This shall include instrument specifications and capabilities, calibration methods and frequency, procedures for handling situations where the halogens levels are greater than 1,000 ppm and record keeping procedures for all loads accepted or refused. A copy of this SOP is available on-site and is also contained in the Used Oil Processing Facility Permit Application. All new employees also receive detailed training in the use of a CFC detection device (i.e. a "sniffer") and portable test kits, both used for to screen used oil for halogens.

e) Documentation is maintained on site showing that all company personnel handling or transporting used oil have completed the above items. A training file is maintained for each employee, and maintained for a period of three years after completion of employment. For their monthly on-line training, an electronic record of each employees completed training is maintained. In the case of in-person training, those paper records include the type of training received, who provided it, along with the dated signature of those receiving and providing the training.

2. Drivers of Customers Who Deliver Used Oil

For drivers of customers who deliver used oil to the UES facility, these non-employees receive a briefing by UES on facility procedures, spill prevention, safety, and spill response procedures prior to delivery of used oil products.

3. Periodic Training

Used oil drivers' continuing training consists of the following:

Monthly Spill Prevention Briefings: Monthly spill prevention trainings are required of all UES employees who are even remotely involved with transporting, handling, receipt, or transfer of used oil. These trainings include emphasis on the importance of personal and environmental safety, including the review of the site-specific SPCC Plan.

Annual Training Review: UES employees review items of this SPCC Plan (particularly Section 1) on an annual basis to ensure the training program is updated to address any changes in regulations or address any changes in facility operations. Records for each employees' annual review of the SPCC plan will be maintained on-site for a minimum of three years.

FIGURES

REFERENCE:
U.S.G.S. SANFORD, FLA.
QUADRANGLE MAP
DATED 2021
SECTION 39
TOWNSHIP 19 SOUTH
RANGE 30 EAST

0 1000 2000 4000

GRAPHIC SCALE: 1"=2000'

Andreyev Engineering, Inc.

USED OIL PROCESSING PERMIT APPLICATION

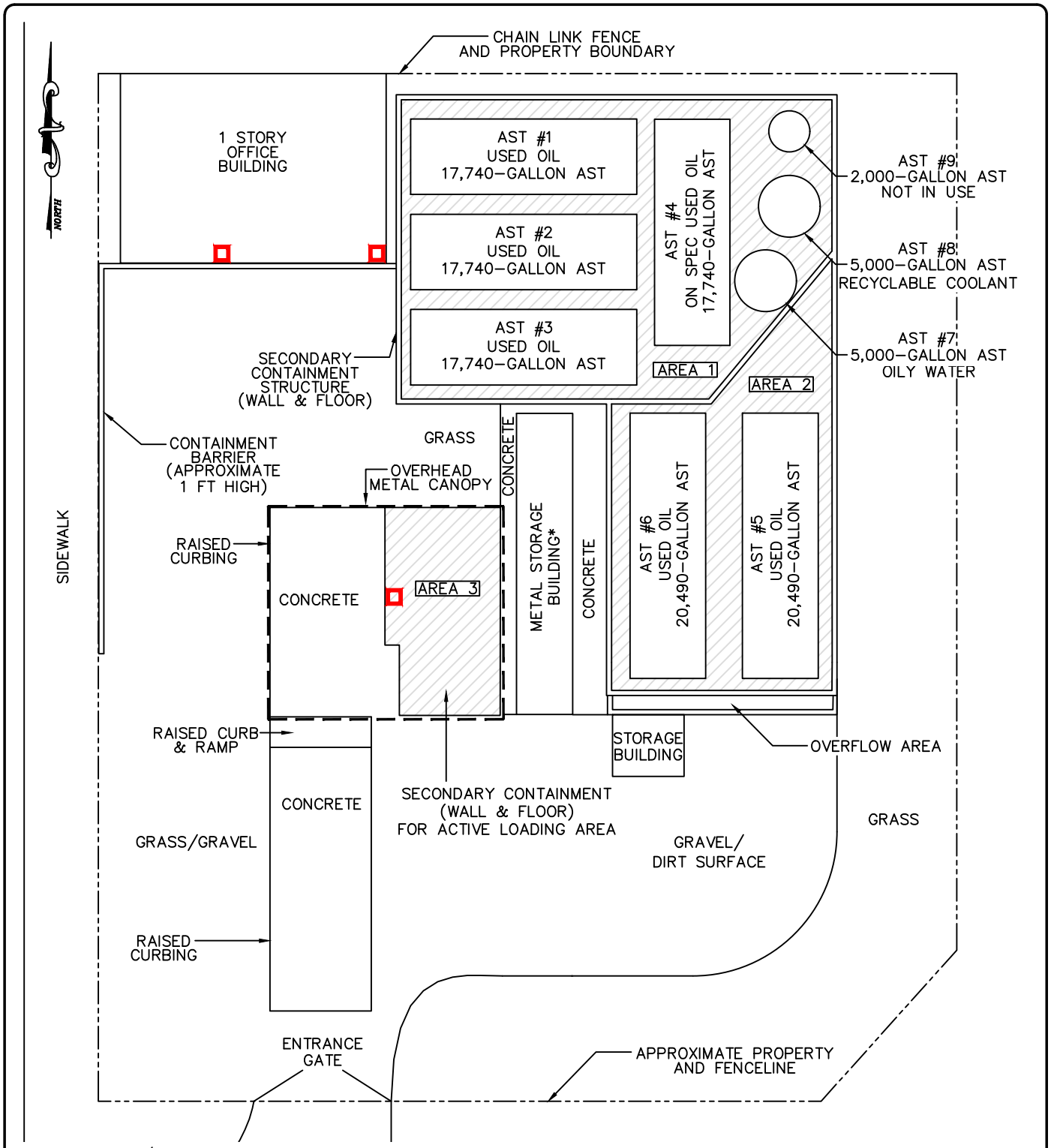
UNIVERSAL ENVIRONMENTAL SERVICES, LLC

509 SOUTH FRENCH AVENUE
SANFORD, SEMINOLE COUNTY, FLORIDA

U.S.G.S. TOPOGRAPHIC MAP

APPROXIMATE SCALE:	DATE: 01/25/22	ENGINEER: JE
1"=2000'	PN: APEN-21-142	DRAWN BY: DLS

FIGURE 1



LEGEND/NOTES:

- FIRE EXTINGQUISHER LOCATIONS
- SECONDARY CONTAINMENT AREAS
- CANOPY AREA

0 10 20 40

GRAPHIC SCALE: 1"=20'

NOTE: *THE METAL STORAGE BUILDING IS USED TO STORE SPILL CONTROL EQUIPMENT & 55-GALLON DRUMS CONTAINING USED OIL FILTERS AWAITING TRANSPORT FOR PROPER RECYCLING AND OFF-SITE DISPOSAL.

Andreyev Engineering, Inc.

APPROXIMATE SCALE: 1"=20'	DATE: 01/25/22	ENGINEER: JE
	PN: APEN-21-142	DRAWN BY: DLS

USED OIL PROCESSING PERMIT APPLICATION

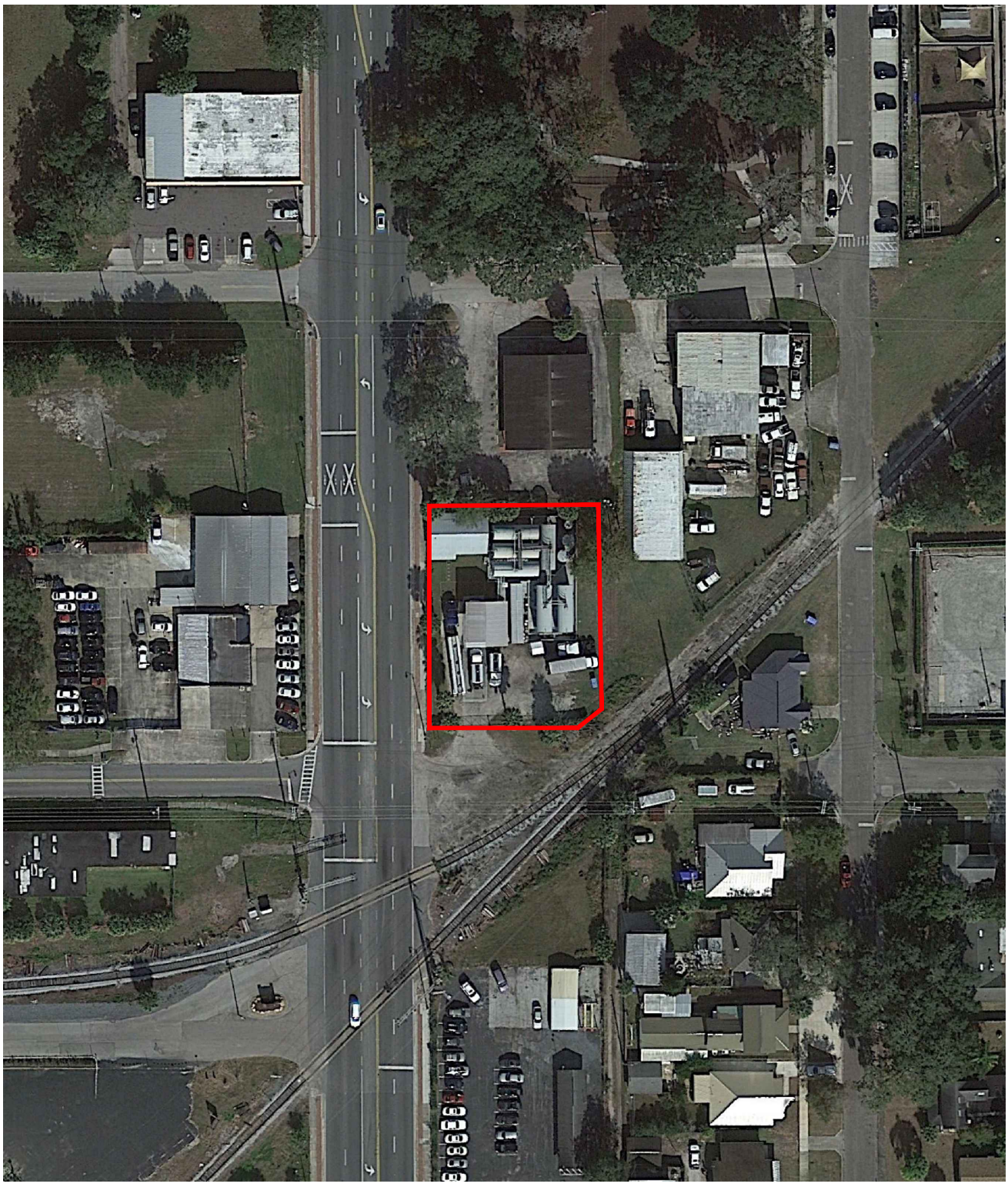
UNIVERSAL ENVIRONMENTAL SERVICES, LLC

509 SOUTH FRENCH AVENUE

SANFORD, SEMINOLE COUNTY, FLORIDA

SITE MAP

FIGURE 2



REFERENCE:
2021 GOOGLE EARTH AERIAL IMAGERY DATED 1/9/2021

LEGEND:

APPROXIMATE SUBJECT PROPERTY BOUNDARY

0 50 100 200

GRAPHIC SCALE: 1"=100'

Andreyev Engineering, Inc.

APPROXIMATE SCALE:	DATE: 01/25/22	ENGINEER: JE
1"=100'	PN: APEN-21-142	DRAWN BY: DLS

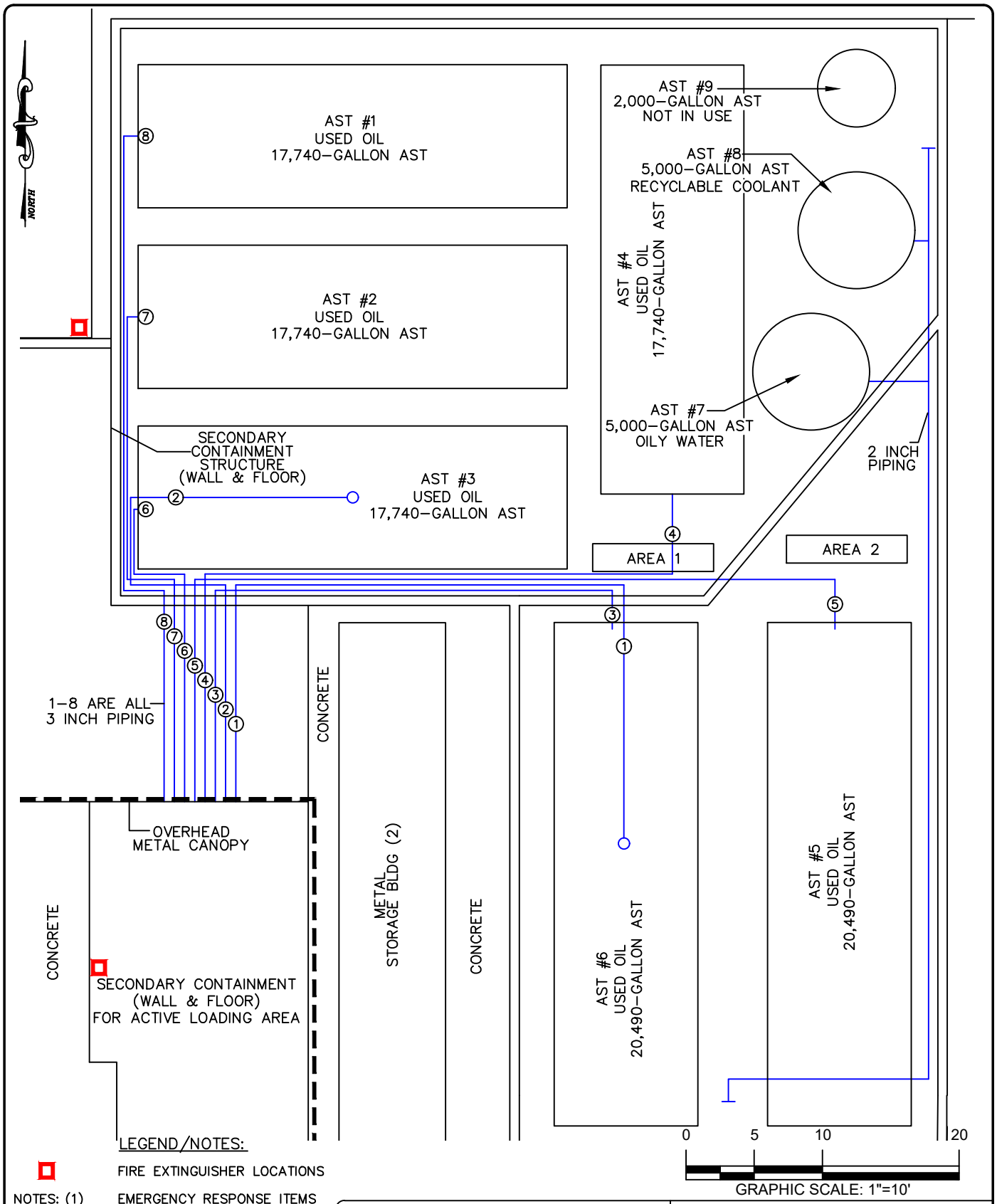
USED OIL PROCESSING PERMIT APPLICATION

UNIVERSAL ENVIRONMENTAL SERVICES, LLC

509 SOUTH FRENCH AVENUE
SANFORD, SEMINOLE COUNTY, FLORIDA

2021 AERIAL PHOTOGRAPH

FIGURE 3



LEGEND/NOTES:

FIRE EXTINGUISHER LOCATIONS

NOTES: (1) EMERGENCY RESPONSE ITEMS ARE CONTAINED IN THE SPILL CONTROL BUILDING.

(2) *THE METAL STORAGE BUILDING IS USED TO STORE SPILL CONTROL EQUIPMENT & 55-GALLON DRUMS CONTAINING USED OIL FILTERS AWAITING TRANSPORT FOR PROPER RECYCLING AND OFF-SITE DISPOSAL.

Andreyev Engineering, Inc.

APPROXIMATE SCALE:	DATE: 01/25/22	ENGINEER: JE
1"=10'	PN: APEN-21-142	DRAWN BY: DLS

USED OIL PROCESSING PERMIT APPLICATION

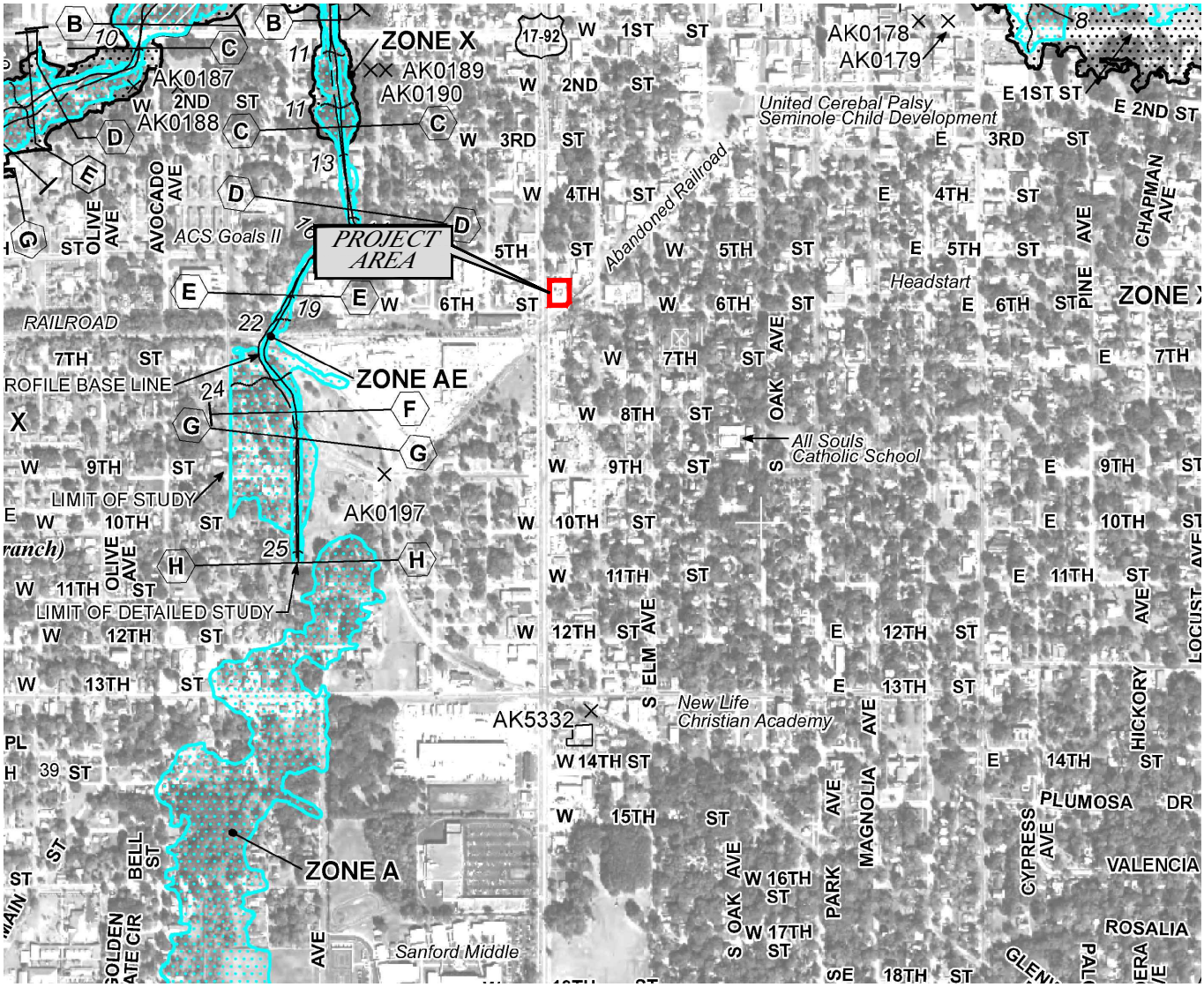
UNIVERSAL ENVIRONMENTAL SERVICES, LLC

509 SOUTH FRENCH AVENUE

SANFORD, SEMINOLE COUNTY, FLORIDA

PIPING LAYOUT

FIGURE 4



LEGEND

SPECIAL FLOOD HAZARD AREAS (SFHAs) SUBJECT TO INUNDATION BY THE 1% ANNUAL CHANCE FLOOD EVENT

The 1% annual chance flood (100-year flood), also known as the base flood, is the flood that has a 1% chance of being equaled or exceeded in any given year. The Special Flood Hazard Area is the area subject to flooding by the 1% annual chance flood. Areas of Special Flood Hazard include Zones A, AE, AH, AO, AR, A99, V, and VE. The Base Flood Elevation is the water-surface elevation of the 1% annual chance flood.

ZONE A	No Base Flood Elevations determined.
ZONE AE	Base Flood Elevations determined.
ZONE AH	Flood depths of 1 to 3 feet (usually areas of ponding); Base Flood Elevations determined.
ZONE AO	Flood depths of 1 to 3 feet (usually sheet flow on sloping terrain); average depths determined. For areas of alluvial fan flooding, velocities also determined.
ZONE AR	Special Flood Hazard Area formerly protected from the 1% annual chance flood event by a flood control system that was subsequently decertified. Zone AR indicates that the former flood control system is being restored to provide protection from the 1% annual chance or greater flood.
ZONE A99	Areas to be protected from 1% annual chance flood event by a Federal flood protection system under construction; no Base Flood Elevations determined.
ZONE V	Coastal flood zone with velocity hazard (wave action); no Base Flood Elevations determined.
ZONE VE	Coastal flood zone with velocity hazard (wave action); Base Flood Elevations determined.

FLOODWAY AREAS IN ZONE AE

The floodway is the channel of a stream plus any adjacent floodplain areas that must be kept free of encroachment so that the 1% annual chance flood can be carried without substantial increases in flood heights.

OTHER FLOOD AREAS

ZONE X	Areas of 0.2% annual chance flood; areas of 1% annual chance flood with average depths of less than 1 foot or with drainage areas less than 1 square mile; and areas protected by levees from 1% annual chance flood.

OTHER AREAS

ZONE X	Areas determined to be outside the 0.2% annual chance floodplain.
ZONE D	Areas in which flood hazards are undetermined, but possible.

COASTAL BARRIER RESOURCES SYSTEM (CBRS) AREAS

OTHERWISE PROTECTED AREAS (OPAs)

CBRS areas and OPAs are normally located within or adjacent to Special Flood Hazard Areas.

Andreyev Engineering, Inc.

USED OIL PROCESSING PERMIT APPLICATION

UNIVERSAL ENVIRONMENTAL SERVICES, LLC

509 SOUTH FRENCH AVENUE

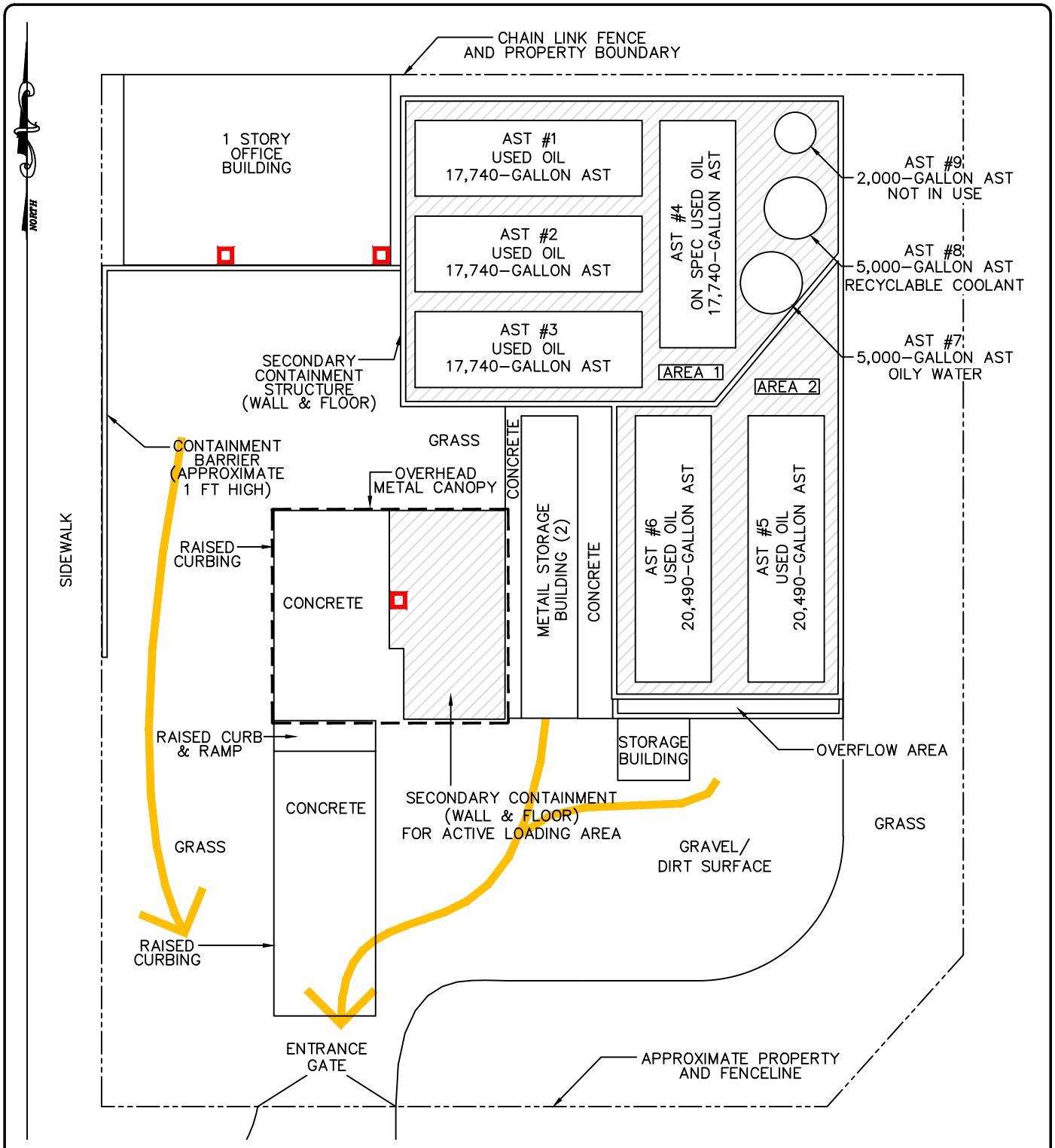
SANFORD, SEMINOLE COUNTY, FLORIDA

FLOOD INSURANCE RATE MAP

EFFECTIVE SEPTEMBER 28, 2007

APPROXIMATE SCALE:	DATE: 01/25/22	ENGINEER: JE
1"=1000'	PN: APEN-21-142	DRAWN BY: DLS

FIGURE 5



LEGEND/NOTES:

- FIRE EXTINGUISHER LOCATIONS
- SECONDARY CONTAINMENT AREAS
- EMERGENCY EVACUATION ROUTE

NOTES: (1) EMERGENCY RESPONSE ITEMS ARE CONTAINED IN THE SPILL CONTROL BUILDING.

(2) *THE METAL STORAGE BUILDING IS USED TO STORE SPILL CONTROL EQUIPMENT & 55-GALLON DRUMS CONTAINING USED OIL FILTERS AWAITING TRANSPORT FOR PROPER RECYCLING AND OFF-SITE DISPOSAL.

Andreyev Engineering, Inc.

APPROXIMATE SCALE:	DATE: 06/16/17	ENGINEER: JE
1"=20'	PN: APEN-17-069	DRAWN BY: DLS

USED OIL PROCESSING PERMIT APPLICATION

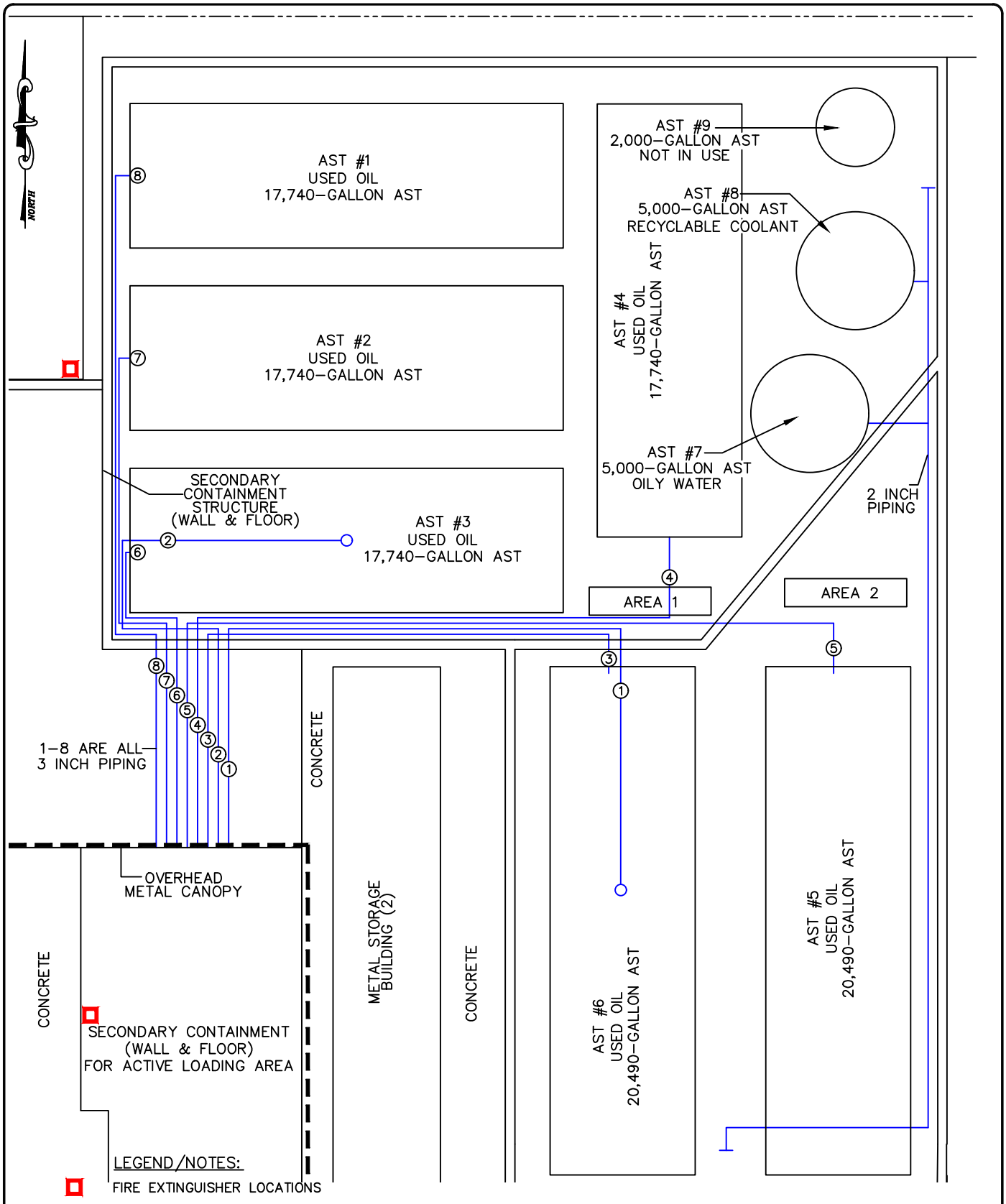
UNIVERSAL ENVIRONMENTAL SERVICES, LLC

509 SOUTH FRENCH AVENUE

SANFORD, SEMINOLE COUNTY, FLORIDA

ATTACHMENT 6
CONTINGENCY PLAN

FIGURE 6



NOTES: (1) EMERGENCY RESPONSE ITEMS ARE CONTAINED IN THE SPILL CONTROL BUILDING.

(2) *THE METAL STORAGE BUILDING IS USED TO STORE SPILL CONTROL EQUIPMENT & 55-GALLON DRUMS CONTAINING USED OIL FILTERS AWAITING TRANSPORT FOR PROPER RECYCLING AND OFF-SITE DISPOSAL.

Andreyev Engineering, Inc.

APPROXIMATE SCALE:	DATE: 06/16/17	ENGINEER: JE
1"=10'	PN: APEN-17-069	DRAWN BY: DLS

USED OIL PROCESSING PERMIT APPLICATION

UNIVERSAL ENVIRONMENTAL SERVICES, LLC

509 SOUTH FRENCH AVENUE

SANFORD, SEMINOLE COUNTY, FLORIDA

ATTACHMENT 6
CONTINGENCY PLAN

FIGURE 7

FORMS

Department of Environmental Protection

2600 Blair Stone Road ♦ Tallahassee, Florida 32399-2400

DEP Form 62-762.901(6)
Form Title: Incident Notification Form
Effective Date: January 2017
Incorporated in Rule 62-762.411, F.A.C.

Incident Notification Form

Complete all applicable blanks

Facility ID Number (if registered):_____ **Date of Form Completion:**_____

Facility Name:_____ **Date of Discovery of Incident:**_____

Telephone Number:_____ **County:**_____

Facility Owner or Operator:_____

Mailing Address:_____

Location of Incident (facility street address):_____

Monitoring method or activity that indicates an incident: (Check all that apply)

- ☐ Visual Observation
- ☐ Primary integrity test
- ☐ Interstitial integrity test
- ☐ Containment integrity test
- ☐ Electronic sensors, probes or cables
- ☐ Interstitial monitoring
- ☐ Closure integrity evaluation
- ☐ Tracer or helium testing
- ☐ Closure
- ☐ Line leak detectors
- ☐ Automatic tank gauging
- ☐ Other (specify): _____

Type of regulated substance stored in the storage system: (Check all that apply)

- ☐ Gasoline
- ☐ Diesel
- ☐ Heating oil
- ☐ Kerosene
- ☐ Aviation gas
- ☐ Jet fuel
- ☐ Used/waste oil
- ☐ New motor/lube oil
- ☐ Pesticide
- ☐ Grades 5 & 6 residual oils
- ☐ Mineral acid (ASTs)
- ☐ Ammonia compound ☐ Chlorine compound
- ☐ Biofuel blends
- ☐ Unknown
- ☐ Other (specify):_____
- ☐ Hazardous substance (USTs) – write name or Chemical Abstract Service (CAS) #:_____

Incident involves or originated from: (Check all that apply)

A positive response of release detection device:	A failed integrity test:	Or:
☐ 1. Visual observation	☐ 1. Double-walled tank	☐ 1. Odors in the vicinity
☐ 2. Alarm	☐ 2. Double-walled piping	☐ 2. Loss > 100 gallons on impervious surface
☐ 3. Vacuum or pressure change	☐ 3. Containment sump	☐ 3. Loss > 500 gallons in AST dike field
☐ 4. MLLD restricting flow	☐ 4. Spill containment system	☐ 4. Unusual operating conditions
☐ 5. ELLD/other device shutting power off to pump	☐ 5. Double bottom AST	☐ Other (specify):_____
☐ 6. Liquid>1 inch in out-of-service tank (UST only)		

Cause of the incident, if known: (Check all that apply)

- ☐ Improper installation
- ☐ Material failure (crack, split, etc.)
- ☐ Material incompatibility
- ☐ Faulty probe or sensor
- ☐ Spill/Overfill >100 gallons on impervious surface
- ☐ Spill/Overfill >500 gallons in AST dike field
- ☐ Corrosion
- ☐ Weather
- ☐ Human error
- ☐ Vandalism or theft
- ☐ Unknown
- ☐ Other (specify):_____

Actions taken in response to the incident:

Comments:

Agencies notified (as applicable):

☐ Fire Department ☐ County Program _____ ☐ District Office ☐ State Watch Office 800-320-0519 ☐ National Response Center 800-424-8802

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 and Authorized Representative

Department of Environmental Protection

2600 Blair Stone Road ♦ Tallahassee, Florida 32399-2400

DEP Form: 62-762.901(1)
Form Title: Discharge Report Form
Effective Date: January 2017
Incorporated in Rule 62-762.411, F.A.C.

DISCHARGE REPORT FORM

Complete all applicable blanks, and submit copies of any analytical or field test results confirming contamination to soils, surface water, or groundwater to the County via email or mail.

Facility ID Number (If Registered):_____ Date of Form Completion:_____ Date of Discovery: _____

Facility Name:_____ County:_____

Facility (Property) Owner:_____ Telephone Number:_____

Owner Mailing Address:_____

Location of Discharge (Facility Street Address):_____ Lat/Long:_____

Date of receipt of any test or analytical results confirming a discharge:_____ Estimated number of gallons discharged:_____

Discharge affected: (Check all that apply)

☐ Soil ☐ Groundwater ☐ Soil water (water body name) _____
☐ Drinking water well(s) ☐ Shoreline ☐ Other (specify) _____

Evidence of discharge: (Check all that apply)

☐ Visual observation of sheen ☐ Results or receipt of results of analytical tests ☐ Stained soils
☐ Visual observation of free product ☐ Spill or vehicle overfill > 25 gallons to a pervious surface ☐ Other (explain in comments)

Method of discovery and confirmation of discharge: (Check all that apply, see rule language explanation on instructions for this form)

☐ Visual observation ☐ Closure/Closure sampling assessment ☐ Surface water analytical results
☐ Groundwater analytical results ☐ Soil analytical results ☐ Other (specify)_____

Type of regulated substance discharged: (Check all that apply)

☐ Gasoline ☐ Jet fuel ☐ Mineral acids (ASTs)
☐ Diesel ☐ Used/waste oil ☐ Ammonia compound Chlorine compound
☐ Heating oil ☐ New motor/lube oil ☐ Biofuel blends
☐ Kerosene ☐ Pesticide ☐ Unknown
☐ Aviation gas ☐ Grade 5 & 6 residual oils Other (specify)_____
☐ Hazardous substance (USTs) – write name or Chemical Abstract Service (CAS) #:_____

Discharge originated from a: (Check all that apply)

☐ Tank ☐ Other secondary containment ☐ Railroad tankcar
☐ Piping ☐ Fitting or pipe connection ☐ Barge, tanker ship or other vessel
☐ Spill bucket ☐ Valve ☐ Pipeline
☐ Dispenser ☐ Tank truck ☐ Drum
☐ Piping sump ☐ Vehicle or customer vehicle ☐ Unknown
☐ Dispenser sump ☐ Aircraft ☐ Other (specify)_____

Cause of the discharge: (Check all that apply)

☐ Spill ☐ Material failure (crack, split, etc.) ☐ Collision ☐ Weather
☐ Overfill ☐ Material incompatibility ☐ Vehicle accident ☐ Human error
☐ Corrosion ☐ Improper installation ☐ Fire/explosion ☐ Unknown
☐ Puncture ☐ Loose connection ☐ Vandalism ☐ Other (specify)_____

Actions taken in response to the discharge:

Comments:

Agencies notified (as applicable):

☐ Fire Department ☐ County Program_____ ☐ District Office _____ ☐ State Watch Office 800-320-0519 ☐ National Response Center 800-424-8802

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

Print Form

Department of Environmental Protection

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

DEP Form #62-710.901(2)
Form Title Used Oil and Used Oil Filter Record Keeping Form
Effective Date June 9, 2005

Used Oil and Used Oil Filter Record Keeping Form

Rule 62-710.510 of the Florida Administrative Code requires each registered person to maintain records on either this or a substantially equivalent form which contains the same information. This information must be kept on-site for three (3) years and be available for inspection by DEP during normal business hours. Used Oil Filter information is optional (but recommended), the Used Oil from filter management must be recorded and reported.

A. **Used Oil Source** Name, Street Address, City, State, Zip Code, EPA ID Number, if applicable	B. **Date**	C. **Number of Filters**	D. **Gallons of Used Oil**	E. **Type Code**	F. **End Use Code**	G. **Destination of Used Oil /Used Oil Filters** Name, Street Address, City, State, Zip Code, EPA ID Number, if applicable	H. **State** Mark "X" if not Florida

I. TOTAL COLLECTED

	Automotive	Industrial	Mixed
In State			
Out of State			

J. TOTAL END USED

End Use Code	N	O	F	B	I	D
In State						
Out of State						

APPENDICIES

APPENDIX A

SITE PHOTOGRAPHS

Site Photographs
SPCC Plan
Universal Environmental Services, LLC.
509 S. French Ave., Sanford FL
Site Inspection and photos December 6, 2021

					
Photo #1:	UES truck used for collecting used oil and oil filters from vendors. 2800 gallon capacity. Facing west.		Photo #2:	Loading Area with Secondary Containment Area 3. Facing south.	
					
Photo #3:	ASTs # 1,2,and 4 from above. Facing East.		Photo #4:	ASTs # 1, 2, 3, 4 in foreground. ASTs # 5 & 6 in background. Facing southeast.	
					
Photo #5:	View of AST #5 with inlet pipe and vent. Facing southeast across neighboring property and RR tracks.		Photo #6:	View of vertical ASTs # 7, 8, and 9. Horizontal AST # 4 on left. Facing Northeast.	

Site Photographs
SPCC Plan
Universal Environmental Services, LLC.
509 S. French Ave., Sanford FL
Site Inspection and photos December 6, 2021

Photo #7:	ASTs #1, 2, & 3, facing east. The office building is shown on the left.

Photo #8:	AST #3 on left and AST #6 in background. Loading Area on the right. Facing east to oil filter storage building.

Photo #9:	View of the underside and support cradle for AST #2.

Photo #10:	View of sealed concrete wall which is part of Secondary Containment Area 1. Facing north.

Photo #11:	Concrete footing of AST #4, showing minor rust. Painted last in 2016-17.

Photo #12:	View south of Secondary Containment Area 1 showing structural supports.

APPENDIX B

HALOGEN SCREENING STANDARD OPERATING PROCEDURES

Halogen Screening Standard Operating Procedures

for Universal Environmental Services-Sanford

Universal Environmental Services-Sanford (UES-Sanford) conducts field screening (testing) of used oil to prevent costly hazardous waste from being missed with non-contaminated oil for proper management and disposal. In addition to other criteria, the following were considered when developing this halogen determination and testing methodology:

- Employee safety;
- Simple, quick and relatively low set-up cost by using existing technologies;
- Containment and recovery of the halogens released from the used oil (i.e., eliminate atmospheric release of ozone depleting chemicals);
- Compliance with the requirements of state and federal health and safety codes.

Test instrument specifications:

This company is currently using Clor-D-Tect 1000 Chlorine Halogen Test Kit manufactured by Dexsil Corporation

AND, OR,

This company is currently using a model #TIFRX-1A CFC detection device (sniffer) manufactured by TIF

The instrument(s) are calibrated using the following method(s):

The calibration is done by using a standard with 900 ppm of halogens.

Calibration is performed in a bi-weekly basis.

Transporter Drivers, managers and employees of UES-Sanford are given training on the use and application of chlorine field test kits and CFC detection devices ("sniffers") as follows:

Employees are trained at the start of their employment with the company and re-trained throughout the term of their employment. These re-trainings are logged and records are kept in the employee file.

Field testing and sampling either from the generator's storage tank or from a sample taken in accordance with EPA Regulations and ASTM Methods is accomplished by:

> Field testing is done by using the CFC Detection device (sniffer) to determine halogen levels. If the sniffer has a negative result, a Clor D Tect 1000 halogen test is done to determine the halogen level on site at the generators location.

All loads that have been tested and indicated halogen levels in excess of 1,000 PPM are handled as follows:

> We do not pump any oil(s) with a halogen level over 1,000 ppm as determined on site.

After the testing is completed and the used oil is certified as on-specification fuel, it and the corresponding documentation will be marketed as such. If the halogen test result from that product shows that the used oil contains more than 1,000 ppm total halogens, the load and shall be rejected and FDEP will be provided with the test results within seven (7) days of obtaining them.

In the event UES-Sanford has a need for or is required to use the services of a third party for halogen screening analysis (Certified Test Lab), including either:

Laboratory Name:	PhosLab Environmental Services
Lab ID	NELAP Lab ID 6242; DOH ID E84925
Address:	806 W. Beacon Road
City, State, Zip:	Lakeland, Florida 33803-2847
Phone:	863-682-5897 Fax: 863-683-3279
Attention:	George Fernandez or Dave Pomella

Or

Laboratory Name:	American Testing Technologies
Lab ID	NELAP Lab ID 6396; DOH ID E871084
Address:	1350 Home Ave.
City,State, Zip:	Akron, OH 44310
Phone:	(330) 634-9906

In compliance with F.S. 62-710, Used Oil Management Rule, and 40 CFR SS 279.44(b) abd 279.44(d), 279.70(c), and 279.63, respectively, the documentation and records for all loads of used oil products and materials-either picked up or refused at a generator's facility, are maintained for three years at the company's main office located at 509 S. French Avenue, Sanford, FL 32771.

Generator Education: it is the goal of UES-Sanford to instruct and educate its generator customers not the allow mixing of halogenated solvents or paint thinners with waste oil or used oil filters. The generators are warned that doing so, could result in the mixture being required to be disposed of as hazardous waste.

APPENDIX C

SECONDARY CONTAINMENT CALCULATIONS

SECONDARY CONTAINMENT CALCULATIONS

Universal Environmental Services-Sanford

509 S. French Ave, Sanford FL

Area 1, Northern Area of Secondary Containment:

a. Area 1 has a total area measurement of 2,370 square feet. Other items which occupy surface area within the secondary containment structure include two 5,000-gallon ASTs, one 2,000 gallon AST, sixteen (16) 1x1.6 ft block supports, and eight (8) 1 x 3.0 ft block supports.
b. The diameter of the 5,000-gallon AST is 7 ft. The area associated with one 5,000-gallon AST is determined by 3.141 x $(3.5 \text{ ft})^2$ = 38.5 sq. ft. For the two 5,000-gallon ASTs, the total area is 77 sq. ft.
c. The area associated with one 2,000 gallon AST is determined by 3.141 x $(1.75 \text{ ft})^2$ = 9.6 sq. ft.
d. The area associated with 16 supports which each measure 1.0 ft by 1.6 ft is determined by 16 x 1.0 ft x 1.6 ft = 25.6 sq. ft.
e. The area associated with 8 supports which measure 1.0 ft. by 3.0 ft = 24 sq. ft.
f. 2,370 sq. ft. minus 77, 9.6, 25.6, and 24 = 2,233.8 sq. ft.
g. The depth of the secondary containment structure is 2.3 feet. The containment volume of Area 1 is determined by 2,233.8 ft. x 2.3 ft. = 5,137 cubic feet. The gallons for Area 1 is determined by 5,137 cubic feet x 7.48 gallons/cubic ft = 38,424 gallons.

Area 2, Southern Area of Secondary Containment:

a. Area 2 has a total area measurement of 1,180 square feet. Other items which occupy surface area within the secondary containment structure include six (6) concrete block saddles which are 2.6 ft wide and 8.8 ft long.
b. The area associated with the 6 concrete saddles (2.6 ft x 8.8 ft x 6) is 137 sq ft.
c. 1,180 square feet minus 137 sq ft = 1,043 sq ft.
d. The depth of the secondary containment structure is 2.3 feet. The containment volume of Area 2 is determined by 1,043 sq. ft x 2.3 ft = 2,399 cubic ft. The volume in gallons for Area 2 is determined by 2,399 cubic ft x 7.48 gallons/cubic ft = 17,943 gallons

The Total Capacity of the Secondary Containment Area is <u>56,368</u> <u>gallons</u>.

APPENDIX D

COPY OF INSPECTIONS SHEETS FOR 2019-2021

FACILITY ADDRESS 509 S French Ave I. D. # 8516543 Sanford, FL 32771	ABOVEGROUND STORAGE TANK VISUAL INSPECTION CHECKLIST

2019 MONTH	DATE	SECONDARY CONTAINMENT INTEGRITY	TANK EXTERIOR INTEGRITY	PIPING EXTERIOR INTEGRITY	DRAIN VALVE SECURE	LIQUID ACCUMULATION REMOVAL	STAINED SOIL AROUND CONTAINMENT AREA	INITIALS
JANUARY	1/4/19	ok	ok	ok	ok	ok	ok	KW
FEBRUARY	2/6/19	ok	ok	ok	ok	ok	ok	KW
MARCH	3/4/19	ok	ok	ok	ok	ok	ok	KW
APRIL	4/5/19	ok	ok	ok	ok	ok	ok	KW
MAY	5/3/19	ok	ok	ok	ok	ok	ok	KW
JUNE	6/3/19	ok	ok	ok	ok	ok	ok	KW
JULY	7/1/19	ok	ok	ok	ok	ok	ok	KW
AUGUST	8/2/19	ok	ok	ok	ok	ok	ok	KW
SEPTEMBER	9/6/19	ok	ok	ok	ok	ok	ok	KW
OCTOBER	10/4/19	ok	ok	ok	ok	ok	ok	KW
NOVEMBER	11/5/19	ok	ok	ok	ok	ok	ok	KW
DECEMBER	12/4/19	ok	ok	ok	ok	ok	ok ±	KW

OTHER COMMENTS:

FACILITY ADDRESS 501 S French Ave I. D. # 8516243 Sanford, FL 32771	ABOVEGROUND STORAGE TANK VISUAL INSPECTION CHECKLIST

MONTH	DATE	SECONDARY CONTAINMENT INTEGRITY	TANK EXTERIOR INTEGRITY	PIPING EXTERIOR INTEGRITY	DRAIN VALVE SECURE	LIQUID ACCUMULATION REMOVAL	STAINED SOIL AROUND CONTAINMENT AREA	INITIALS
JANUARY	1/3/20	Ok	Ok	Ok	Ok	Ok	ok	KV
FEBRUARY	2/4/20	Ok	Ok	Ok	Ok	Ok	Ok	KV
MARCH	3/2/20	ok	ok	ok	ok	ok	ok	KV
APRIL	4/3/20	Ok	Ok	Ok	Ok	Ok	Ok	KV
MAY	5/5/20	Ok	Ok	Ok	Ok	ok	ok	KV
JUNE	6/3/20	ok	Ok	ok	ok	ok	ok	KV
JULY	7/3/20	Ok	Ok	Ok	Ok	Ok	Ok	KV
AUGUST	8/4/20	Ok	Ok	Ok	Ok	Ok	ok	KV
SEPTEMBER	9/2/20	ok	Ok	ok	ok	ok	ok	KV
OCTOBER	10/5/20	ok	ok	ok	ok	ok	ok	KV
NOVEMBER	11/3/20	ok	ok	ok	ok	ok	ok	KV
DECEMBER	12/1/20	ok	ok	ok	ok	ok	ok	KV

OTHER COMMENTS:

FACILITY ADDRESS 509 S French Ave
Sanford FL 32771
I. D. # 8516543

ABOVEGROUND STORAGE TANK
VISUAL INSPECTION CHECKLIST

MONTH	DATE	SECONDARY CONTAINMENT INTEGRITY	TANK EXTERIOR INTEGRITY	PIPING EXTERIOR INTEGRITY	DRAIN VALVE SECURE	LIQUID ACCUMULATION REMOVAL	STAINED SOIL AROUND CONTAINMENT AREA	INITIALS
JANUARY	1/4/21	ok	ok	ok	ok	ok	ok	KW
FEBRUARY	2/2/21	ok	ok	ok	ok	ok	ok	KW
MARCH	3/2/21	ok	ok	ok	ok	ok	ok	KW
APRIL	4/5/21	ok	ok	ok	ok	ok	ok	KW
MAY	5/4/21	ok	ok	ok	ok	ok	ok	KW
JUNE	6/1/21	ok	ok	ok	ok	ok	ok	KW
JULY	7/2/21	ok	ok	ok	ok	ok	ok	KW
AUGUST	8.2.21	ok	ok	ok	ok	ok	ok	KW
SEPTEMBER	9.3.21	ok	ok	ok	ok	ok	ok	KW
OCTOBER	10.4.21	ok	ok	ok	ok	ok	ok	KW
NOVEMBER	11/2/21	ok	ok	ok	ok	ok	ok	KW
DECEMBER	12/3/21	ok	ok	ok	ok	ok	ok	KW

OTHER COMMENTS:

APPENDIX E

UES-SANFORD
TANK SYSTEMS INTEGRITY ASSESSMENT RESULTS
BY MR. RICK GEORGE, STI INSPECTOR NO. AST-1881
FEBRUARY 2022

Universal Environmental Services

3/4/2022

Tank Integrity Assessment and Ultrasonic Thickness Testing for
Universal Environment Services, LLC
509 S French Avenue
Sanford, FL 32771
EPA ID No FLR000050369
DEP Permit: 266845-004-HO

SUMMARY

An AST SP001 Inspection was performed on 2/21/22 through 2/24/22 at Universal Environmental Services, 509 South French Avenue, Sanford, Florida 32771.

Based on my assessment and Ultrasonic Testing, the eight above ground tanks and the associated tank systems appear to be in good condition with no deficiences requiring immediate action.

The following are recommendations for future servicing and inspections, in order to ensure continued safe and reliable operation.

- Replace wooden planks on walkway where needed
- Attach pipe support next to free standing ladder to pipe from tank 5
- Remove free standing ladder at the end of tank 4, if not in use

Table 1 and Table 2 on page 3 detail the assessment of the tanks.

The following instruments were used for test results and instruments were calibrated prior to inspection.

- Ultrasonic Thickness (UT) testing … Olympus 45MG
- Pit testing … Western Instruments Tri-Gauge
- Ground resistance testing … AEMC Instruments clamp on ground resistance tester Model 3711

Recommended continued routine maintenace to ensure all surfaces are inspected and routinely maintained.

The full inspection report is on file at the facility.

Inspector Signature: Rick George

Rick George
STI Inspector No. AST-1881
(C) 404/597/6605
rgeorge@universalenviro.com
411 Dividend Drive/Peachtree City/Ga/30269

Table 1. Summary of Tank Minimum Thicknesses

Tank ID	Dimensions (radius x length) and Configuration	Facility Tank Chart Volume (gallons)	Original Thickness (inches)	Minimum Measured Thickness (inches)			Thickness % Remaining at point of minimum thickness
				Top	Bottom	Ends/sides	
Tank 1	9'-10"x30'-1" Horizontal	17,740	0.25	0.248	0.235	0.253	94%
Tank 2	9'1-0"x30'-1" Horizontal	17,740	0.25	0.236	0.212	0.245	85%
Tank 3	9'-10"x30'-1" Horizontal	17,740	0.25	0.252	0.185	0.250	74%
Tank 4	9'-10"x30'-1" Horizontal	17,740	0.25	0.263	0.227	0.235	91%
Tank 5	10'x30'-10.5" Horizontal	20,490	0.25	0.268	0.253	0.261	100%
Tank 6	10'x30'-10.5" Horizontal	20,490	0.25	0.259	0.235	0.261	94%
Tank 7	8'x13'-6" Vertical	5,000	0.25**	0.222	NA	0.229	89%
Tank 8	8'x13'-6" Vertical	5,000	0.25**	0.208	NA	0.251	83%

** Based on the February 2022 inspection, we conclude that Tank 7and Tank 8 had 0.250" wall thickness.

Table 2. Summary of Other Tank Inspection Observations

Tank ID	Dimensions (radius x length) and Configuration	Facility Tank Chart Volume (gallons)	Pitting Observed (inches)	Indentation Observed	General Condition
Tank 1	9'-10"x30'-1" Horizontal	17,740	0.030 – 0.070	None Observed	Good
Tank 2	9'-10"x30'-1" Horizontal	17,740	0.020 – 0.050	None Observed	Good
Tank 3	9'-10"x30'-1" Horizontal	17,740	0.030 – 0.050	South Side	Good
Tank 4	9'-10"x30'-1" Horizontal	17,740	0.020 – 0.050	None Observed	Good
Tank 5	10'x30'-10.5" Horizontal	20,490	None observed	None Observed	Good
Tank 6	10'x30'10.5" Horizontal	20,490	None observed	None Observed	Good
Tank 7	8'x13'-6" Vertical	5,000	None observed	None Observed	Good
Tank 8	8'x13'-6" Vertical	5,000	None observed	None Observed	Good