



August 10, 2023

Project No. 31406711.000

Michell Mason Smith, Environmental Administrator

Florida Department of Environmental Protection - Permitting and Compliance Assistance Program (PCAP)
M.S. 4560 FDEP
2600 Blair Stone Road
Tallahassee, Florida 32399-2400

**RE: FIRST REQUEST FOR ADDITIONAL INFORMATION
RAIDER ENVIRONMENTAL SERVICES, INC. – MULBERRY
EPA ID NUMBER: FLR000176271
CURRENT USED OIL & MATERIAL PERMIT: 316140-006-HO & 316140-007-SO
DEP APPLICATION NUMBER: 316140-008-HO & 316140-009-SO
POLK COUNTY – HAZARDOUS WASTE**

Mr. Smith:

This correspondence provides the additional information requested by the Florida Department of Environmental Protection (Department) concerning the Raider Environmental Services of Florida, Inc. a wholly owned subsidiary of Heritage-Crystal Clean, LLC (HCC), Mulberry Used Oil & Material Permit Renewal Application that was submitted on June 12, 2023 (DEP Application Number 316140-008-HO & 316140-009-SO). RAI comments are presented on italics followed by our response in bold.

Comment 1: *Form 8700-12FL: Dates are missing from Sections 7 and 8. Also for Section 8, operator should be a person's name and person's phone number should be provided.*

Response 1: Section 7 and Section 8 have been updated accordingly. Please refer to revised Form 8700-FL included in Attachment 1.

Comment 2: *Form 8700-12FL: Mercury hazardous waste code is missing from Section 10.*

Response 2: Section 10 has been updated accordingly. Please refer to revised Form 8700-FL included in Attachment 1.

Comment 3: *Form 8700-12FL: Section 16 – No boxes are checked and no attachments provided. Please check appropriate box and provide corresponding attachment.*

Response 3: Section 16 has been updated accordingly. Please refer to revised Form 8700-FL included in Attachment 1. Corresponding attachments including the Used Oil Annual Report and Evidence of Liability Insurance are provided in Attachment 2.

Comment 4: *DEP Form 62-710.901(6): Land Owner Certification is not signed. Please have owner sign.*

Response 4: As discussed during a phone call between Ms. Anita Decina and Ms. Lauren Coleman on August 10, 2023, HCC is coordinating with the landowner, Raider Realty, LLC to obtain landowner certification and will provide this information as soon as it is available.

Comment 5: *DEP Form 62-710.901(6): P.E. Certification – In accordance with Rule 61G15-23.002, F.A.C., digitally created professional engineer license seals shall be a minimum of 1 – 7/8 inches in diameter when the image is represented in native (unreduced) document size. In addition, the seal and signature do not meet the requirements of Rule 61G15-23.004, F.A.C., which stipulates the procedures for digitally signing and sealing documents. Please correct and have the application properly signed and sealed by the professional engineer.*

Response 5: DEP Form 62-710.901(6) has been revised accordingly and is included in Attachment 3.

Comment 6: *DEP Form 62-710.901(6): Section A.12 – Legal Structure: Address is missing.*

Response 6: DEP Form 62-710.901(6) has been revised accordingly and is included in Attachment 3.

Comment 7: *DEP Form 62-710.901(6): Section C.2: Hazardous Waste Codes reported here and on Form 8700-12FL differ. Codes should be the same.*

Response 7: DEP Form 62-710.901(6) has been revised accordingly to match Form 8700-12FL and is included in Attachment 3.

Comment 8: *Attachment 5 – Tracking: No name, address, or EPA identification was provided for transporter. Please include.*

Response 8: Tracking Plan has been updated to include the transporter name, address and EPA identification number. The revised Tracking Plan is included in Attachment 4.

Comment 9: *Attachment 7 – Unit Management: The tank certification by the professional engineer is missing.*

Response 9: Unit Management Plan has been updated to include the professional engineer certification. The revised Unit Management Plan is included in Attachment 5.

Please contact Vicky Agrawal at vicky.agrawal@wsp.com or Blake Holcomb at blake.holcomb@wsp.com should you have any questions regarding this letter and attachments.

WSP USA Inc.



Vicky Agrawal
Associate Consultant/Civil Engineer



Blake T. Holcomb, PE
Assistant Vice President

BH/VA

CC: Lauren Coleman, FDEP, lauren.coleman@floridadep.gov
Michelle Walper, Crystal Clean, michele.walper@crystal-clean.com
Anita Decina, Crystal Clean, anita.decina@crystal-clean.com

Attachments: Attachment 1 – Revised Form 8700FL
Attachment 2 – Used Oil Annual Report and Evidence of Liability Insurance
Attachment 3 – Revised DEP Form 62-710.901(6)
Attachment 4 – Revised Tracking Plan
Attachment 5 – Revised Unit Management Plan

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ATTACHMENT 1

Revised Form 8700-12FL



8700-12FL - FLORIDA NOTIFICATION OF REGULATED WASTE ACTIVITY

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

Date Received
(for FDEP Official Use Only)

EPA ID: F L R 0 0 0 1 7 6 2 7 1

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

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

Mark 'X' in the correct box *

(must choose one if a notification)

- To obtain a new EPA ID number (for hazardous waste, universal waste, used oil activities, or PCW activities).
To provide updated information for an EPA ID number (to update status and facility identification information).
To provide the final information for an EPA ID number (closing). (see instructions—must complete pages 1, 2, 3, 7)
To obtain new or updating an EPA ID number for conducting Electronic Manifest Broker activities.
Submitting new or revised notification for Part A for permitted facilities.

FL Registration(s)
[X] UW Mercury (see page 4)
[X] HW Transporter (see page 5)
[X] Used Oil (see page 6)

2. Facility or Business Name: *

Raider Environmental Services of Florida, Inc., a wholly owned subsidiary of Heritage-Crystal Clean, LLC

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

Physical Street Address*: 5080 State Road 60 East [] Vessel

City or Town: Mulberry State: FL Zip Code: 33860

County*: Polk Country (if not USA)*:

4. Facility or Business Mailing Address:

[] Same address as #__ above or*:

2000 Center Drive, Suite East C300

City or Town*: Hoffman Estates State*: IL Zip/Postal Code*: 60192 Country (if not USA):

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

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

C. | | | | | | | | D. | | | | | | | |

6. Facility or Business RCRA Contact Person: [X] Same address as # 4 above or:

First Name*: Michelle Last Name*: Walper Title*: Manager, Corporate Regulatory

Phone Number*: (630) 740-0932 Extension*: Fax*:

E-Mail*: michelle.walper@crystal-clean.com

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

City or Town*: State*: Zip Code*: Country (if not USA):

RCRA Hazardous Waste Status Notification or Out of Business Notification		EPA ID No.*		FLR000176271
7. Real Property (FL Land) Owner of the Facility's Physical Location (List additional owners in the comments section.)				
Name of Owner*: Raider Realty, LLC		Date became Owner*: <u>1 / 1 / 2011</u> <input type="checkbox"/> New Owner mm dd yy		
Street or P.O. Box (or same address box is checked)*: 210 SW 44th Avenue		Phone Number*: (305) 949-9949		
City or Town*: Plantation	State*: FL	Zip Code*: 33317	Country (if not USA):	
E-Mail*: steve@raiderenvironmental.com				
Owner Type*: <input checked="" type="checkbox"/> Private <input type="checkbox"/> Federal <input type="checkbox"/> Municipal <input type="checkbox"/> State <input type="checkbox"/> County <input type="checkbox"/> Other _____				
Comments:				
8. Facility Operator (List additional Operators in the comments section). Same address as # <u>4</u> above or:				
Name of Operator*: Mark DeVita		Date became Operator*: <u>9 / 13 / 2021</u> <input type="checkbox"/> New Operator mm dd yy		
Street or P.O. Box (or same address box is checked)*:		Phone Number*: (847) 783-5358		
City or Town*:	State*:	Zip Code*:	Country (if not USA):	
E-Mail*: mark.devita@crystal-clean.com				
Operator Type*: <input checked="" type="checkbox"/> Private <input type="checkbox"/> Federal <input type="checkbox"/> Municipal <input type="checkbox"/> State <input type="checkbox"/> County <input type="checkbox"/> Other _____				
Comments: Raider Environmental Services of Florida, Inc., is a wholly owned subsidiary of Heritage-Crystal Clean, LLC.				
9. RCRA Hazardous Waste Activities at this Facility: (Mark 'X' in all that apply):				
(1) Generator of Hazardous Waste				
<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No (This does not include Universal Waste or Used Oil)				
If YES, Choose only one of the following three categories.				
<input type="checkbox"/> a. Large Quantity Generator (LQG):				
- Generates in any calendar month (includes quantities imported by importer site) 1,000 kilograms or greater per month (kg/mo) (2,200 lbs/mo.) of non-acute hazardous waste; or				
- Generates in any calendar month, or accumulates at any time, more than 1 kg/mo (2.2 lbs/mo) of acute hazardous waste; or				
- Generates in any calendar month, or accumulates at any time, more than 100 kg/mo (220 lb/mo) of acute hazardous spill cleanup material.				
<input type="checkbox"/> b. Small Quantity Generator (SQG):				
- Generates in any calendar month greater than 100kg/mo but less than 1,000 kg/mo (>220 to <2,200 lbs.) of non-acute hazardous waste and/or 1 kg (2.2 lbs) or less of acute hazardous waste and/or no more than 100 kg (220 lbs) of any acute hazardous spill cleanup material.				
<input checked="" type="checkbox"/> c. Very Small Quantity Generator (VSQG):				
- Generates in any calendar month 100 kg/mo or less (220 lbs.) of non-acute hazardous waste and/or 1 kg (2.2 lbs) or less of acute hazardous waste.				
In addition, indicate other generator activities that apply.				
<input type="checkbox"/> d. Short-Term Generator (one-time, not on-going)				
<input type="checkbox"/> e. Mixed Waste (hazardous and radioactive) Generator				
<input type="checkbox"/> f. United States Importer of hazardous waste				
<input type="checkbox"/> g. LQG notifying of VSQG Hazardous Waste Under Control of the Same Person pursuant to 40 CFR 262.17(f). (Addendum A Required)				
<input type="checkbox"/> h. Episodic: Not lasting more than 60 days: <input type="checkbox"/> SQG <input type="checkbox"/> LQG (Addendum B Required)				
<input type="checkbox"/> i. Electronic Manifest Broker , as defined in 40 CFR 260.10, electing to use EPA electronic manifest system to obtain, complete, and transmit an electronic manifest under a contractual relationship with a hazardous waste generator.				

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

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

- (2) **Treater, Storer, or Disposer of Hazardous Waste** (at your facility—Choose Only One) Note: A hazardous waste permit may be required for this activity.
 - a. Operating Commercial TSD
 - b. Operating Non-Commercial TSD
 - c. Non-Operating: Postclosure or Corrective Action Permit or Order (HSWA, etc.)
- (3) **Recycler of Hazardous Waste** (at your facility)
 - Specify: Commercial Non-Commercial
 - Specify: Stores prior to recycling Does not store prior to recycling.
 - Note: A permit maybe required for storage prior to recycling.
- (4) **Exempt Boiler and/or Industrial Furnace**
 - a. Small Quantity On-site Burner Exemption
 - b. Smelting, Melting, and Refining Furnace Exemption
- (5) **Person Authorized to Manage Very Small Quantity Waste Generated at Other Facilities**
Choose this management activity ONLY if you attach EITHER a copy of your application for such authorization OR the authorization you received from FDEP.
- (6) **Receives Hazardous Waste from Off-Site**
- (7) **Underground Injection Control**
- (8) **Recognized Trader**— Mark all that apply
 - a. Importer
 - b. Exporter
- (9) **Importer/ Exporter of Spent Lead-Acid Batteries (SLABs) under 40 CFR subpart G**— Mark all that apply
 - a. Importer
 - b. Exporter

10. Waste Codes for Federally Regulated Hazardous Wastes*: List the waste codes of the Federal hazardous wastes handled at your facility. List them in the order they are presented in the regulations (e.g., D001, D003, F007, K019, P012, U112). Hazardous waste transporters must list codes routinely or usually transported. Use comments or an additional page if more spaces are needed.

1	D001	2	D006	3	D007	4	D008	5	D009	6	D018	7	
8		9		10		11		12		13		14	
15		16		17		18		19		20		21	

11. Other Status Changes (If no longer handling waste or closed, items 9 and 10 should be left blank and items 12-16 skipped):

(A) Central Accumulation Area (CAA) or Facility Closed:

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

(B) Closure Dates:

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

(C) Property Tax Default

(D) Petition for Bankruptcy Protection

12. Universal Waste (UW) Activities (Mark 'X' and complete all that apply) :

A. Federal Notification

Federally Defined Large Quantity Handler (LQH) = Generate/Accumulate: 5,000 kg (11,000 lb) or more of any combination of UW accumulated (at any one time)

Accumulates: a. UW Batteries b. Pesticides c. Pharmaceuticals

d. Mercury Containing Devices e. Mercury Containing Lamps

Destination Facility for UW Note: For this activity, a facility must treat, dispose, or recycle a UW. A permit is required for storage prior to recycling.

B. Florida Universal Pharmaceutical Waste (UPW): one-time notification

Pharmaceuticals **LQH** = 5,000 kg or more of Universal Pharmaceutical Waste (UPW) accumulated (at any one time)

Pharmaceuticals **Acute LQH** = more than 1 kg (2.2 lb) of acutely hazardous ("P-listed") pharmaceutical waste (UPW) accumulated (at any one time)

Reverse Distributor of Universal Pharmaceutical Waste (UPW) (must be permitted with the Florida Department of Business and Professional Regulation [DBPR])

Florida Universal Pharmaceutical Waste (UPW) Transporter

C. Florida Annual Mercury Handler Registration:

For-hire transporters, transfer facilities, handlers, reclamation and recovery facilities of Mercury-Containing Lamps and Devices operating in the State of Florida are required to register annually with the Department using this section of the form [Chapter 62-737, F.A.C.]. A one-time fee of \$1,000 is required for first time registration as a Large Quantity for-hire Handler of Mercury-Containing Lamps and Devices as detailed in 62-737.400(3)(a)3.,F.A.C. (please contact FDEP first).

If you only generate lamps and/or devices or manage pharmaceuticals, do not register or complete the information below.

(1) This form is being submitted as a Florida Registration of Universal Waste Mercury Transporter/Handler for-hire Activities

1st Annual Registration Annual Renewal One-time \$1,000 fee for Mercury for-hire first time LQH registration is attached

<input checked="" type="checkbox"/> For-hire Transporter of Universal Waste Mercury-Containing Lamps or Devices <input checked="" type="checkbox"/> For-hire Transfer Facility of Universal Waste Mercury-Containing Lamps or Devices <input checked="" type="checkbox"/> Mercury-Containing Devices (thermostats, etc.) SQH = less than 100 kg accumulated by for-hire handler <input checked="" type="checkbox"/> Mercury-Containing Lamps SQH = less than 2,000 kg (8,000 lamps) accumulated by for-hire handler	Annual Registration Required
<input type="checkbox"/> Mercury-Containing Devices LQH = 100 kg (220 lb) or more accumulated at any one time by for-hire handler <input type="checkbox"/> Mercury-Containing Lamps LQH = 2,000 kg (4400 lbs/8,000 lamps) or more accumulated by for-hire handler	Annual Registration + one-time \$1,000 fee+ More Requirements (contact FDEP)
(2) Mercury Recovery and/or Reclamation Facility (A <u>hazardous waste permit</u> is required for this activity) <input type="checkbox"/> 1st Annual Registration <input type="checkbox"/> Annual Renewal	Annual Registration Required

Briefly Describe your Universal Waste Activities: We use Drum Top Bulb Crusher(s).

13. Other State Regulated Waste Activities: Petroleum Contact Water (PCW) Recovery Transport [62-740 F.A.C.]

Note: A water facility permit may be required for this activity. An annual report is required for a recovery facility pursuant to Rule [62-740.300(5)] F.A.C.

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

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

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

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

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

1. For own waste only

2. For commercial purposes

3. Both commercial and own waste

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

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

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

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

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

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

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

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

I	L	R	0	0	0	1	3	0	0	6	2
---	---	---	---	---	---	---	---	---	---	---	---

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

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

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

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

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

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

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

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

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

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

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

a. College or University

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

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

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

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

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

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

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

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

a. Transporter (off-site) and noncontiguous locations

b. Transfer Facility

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

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

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

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

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

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

a. Transporter

b. Transfer Facility

c. Processor (Annual Report Required)

d. End User (see instructions for definition)

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

Our mailing (business) address (as listed in Item 4)

The site (facility) address (as listed in Item 3)

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

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

The used oil annual report is attached

Evidence of Liability Insurance pursuant to 62-710.600(2)(e), F.A.C. is attached.

17. Notification of Hazardous Secondary Material (HSM) Activity

(1) Notifying under 40 CFR 260.42 that you will begin managing, are managing, or will stop managing hazardous secondary material under 40 CFR 260.30, 40 CFR 261.4(a)(23), (24), or (27). **(Addendum C Required)**

(2) Notifying under 40 CFR 260.43(a)(4)(iii) that the product of your recycling process has levels of hazardous constituents that are not comparable to or unable to be compared to a legitimate product or intermediate but that the recycling is still legitimate. **(Addendum C Required)**

Required signature page

EPA ID No.*

FLR000176271

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

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

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

Signature of owner, operator, or an authorized representative:



Date Signed (mm-dd-yyyy):

4/12/23

Print Name (First, Middle Initial, Last):

Anita Decina

Title:

Vice President, Operational, Safety & Environmental Excellence

Organization:

Raider Environmental Services of Florida, Inc., a wholly owned subsidiary of Heritage-Crystal Clean, LLC

Used Oil

Email:

anita.decina@crystai-clean.com

Signature of owner, operator, or an authorized representative:

Date Signed (mm-dd-yyyy):

Print Name (First, Middle Initial, Last):

Title:

Organization:

Used Oil

Email:

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

(Name of person completing this form)

(Phone Number)

(E-mail Address)

Only fill out this form if:

- You are the LQG receiving hazardous waste from VSQGs under the control of the same person. Use additional pages if more space is needed.

VSQG 1

New

Update

Delete

A. EPA ID Number (if assigned)

B. Facility Name

C. Facility Street Address

D. City

E. State

F. Zip Code

G. Contact Phone Number

H. Contact Name

I. Contact Email

VSQG 2

New

Update

Delete

A. EPA ID Number (if assigned)

B. Facility Name

C. Facility Street Address

D. City

E. State

F. Zip Code

G. Contact Phone Number

H. Contact Name

I. Contact Email

VSQG 3

New

Update

Delete

A. EPA ID Number (if assigned)

B. Facility Name

C. Facility Street Address

D. City

E. State

F. Zip Code

G. Contact Phone Number

H. Contact Name

I. Contact Email

Only fill out this form if:

- You are an SQG or VSQG generating hazardous waste from a planned or unplanned episodic event, lasting no more than 60 days, that moves the generator to a higher generator category. Note: Only one planned and one unplanned episodic event are allowed within one year; otherwise, you must follow the requirements of the higher generator category. Use additional pages if needed.

Episodic Event

<p>A. Planned</p> <p><input type="checkbox"/> Excess chemical inventory removal</p> <p><input type="checkbox"/> Tank Cleanouts</p> <p><input type="checkbox"/> Short-term construction or demolition</p> <p><input type="checkbox"/> Equipment maintenance during plant shutdowns</p> <p><input type="checkbox"/> Other _____</p>	<p>B. Unplanned</p> <p><input type="checkbox"/> Accidental spills</p> <p><input type="checkbox"/> Production process upsets</p> <p><input type="checkbox"/> Product recalls</p> <p><input type="checkbox"/> "Acts of nature" (Tornado, Hurricane, Flood, etc.)</p> <p><input type="checkbox"/> Other _____</p>
<p>C. Emergency Contact Phone</p>	<p>D. Emergency Contact Name</p>
<p>E. Beginning Date _____ (mm/dd/yyyy)</p>	<p>F. End Date _____ (mm/dd/yyyy)</p>

Waste 1

<p>G. Waste Description</p>	<p>H. Estimated Quantity (in pounds)</p>								
<p>I. Federal Hazardous Waste Codes</p> <table border="1" style="width:100%; border-collapse: collapse;"> <tr> <td style="width:25%; height: 20px;"></td> <td style="width:25%; height: 20px;"></td> <td style="width:25%; height: 20px;"></td> <td style="width:25%; height: 20px;"></td> </tr> <tr> <td style="width:25%; height: 20px;"></td> <td style="width:25%; height: 20px;"></td> <td style="width:25%; height: 20px;"></td> <td style="width:25%; height: 20px;"></td> </tr> </table>									

Waste 2

<p>G. Waste Description</p>	<p>H. Estimated Quantity (in pounds)</p>								
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Waste 3

<p>G. Waste Description</p>	<p>H. Estimated Quantity (in pounds)</p>								
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ATTACHMENT 2

Used Oil Annual Report and Evidence of Liability Insurance



DEPARTMENT OF ENVIRONMENTAL PROTECTION

Mail Station 4560, 2600 Blair Stone Road, Tallahassee, Florida 32399-2400

DEP Form #62-710.901(3)
 Form Title Annual Report by Used
 Oil and Used Oil Filter Handlers
 Effective Date 12/2019
 Incorporated in Rule 62-710.510(5)

Annual Report by Used Oil and Used Oil Filter Handlers*

(*Used Oil handlers are any person(s) subject to the registration requirements of rule 62-710.500 and 62-710.850, F.A.C. See Section A, Box 8 below.)
For the reporting period January 1, 2022 through December 31, 2022

Use the information recorded in your **Record Keeping Form [62-710.901(2)]** or equivalent to complete this document.

SECTION A TO BE COMPLETED BY ALL REGISTERED PERSONS

1. Company Name: Raider Environmental Services of Florida inc. 2. Site Address: 5080 State Road 60 East, Mulberry, FL 33860

3. Telephone No: 847-836-5670 Check box if any of the above items (1-3) have changed since your last registration.

4. EPA ID No. FLR000176271 5. Name of person preparing report (please print) Tony Piotrowski

6. Title: Director of Operations 7. Phone number (if different from #3, above) _____

8. Type of operation (check all that apply): 9. Email Address: tony.piotrowski@crystal-clean.com

Used Oil: Transporter Transfer Facility Collection Center/Aggregation Point Processor
 Marketer: On Spec Off Spec
 Burner (off-specification used oil): Industrial Furnace Industrial Boiler Utility Boiler Heater

Used Oil Filter: Transporter Transfer Facility Processor End User

SECTION B USED OIL (TO BE COMPLETED BY ALL REGISTERED USED OIL HANDLERS). SEE DIRECTIONS BELOW

1. Amount (in gallons) of Used Oil and Oily Wastes collected (type code)	Automotive	Industrial	Mixed	Total
a. In Florida	1,276,415	1,105,495	6,000	2,387,910
b. From out of State				
c. Beginning Inventory				
d. Total (sum of totals from Lines a + b + c)				2,387,910

2. Amount (in gallons) of Used Oil and Oily Wastes managed (end use code)	In State	Out of State
N - Transferred to another facility (not an end use).....	0	2,387,910
O - Marketed as an on-specification used oil fuel.....	0	0
F - Marketed as an off-specification used oil fuel.....	0	0
I - Marketed for an industrial process.....		
B - Burned as an off-specification used oil fuel.....	0	0
D - Disposed of: Landfilled.....	0	0
Treated at a wastewater treatment unit.....	0	0
Incinerated	0	0
3. Total amount (in gallons) of Used Oil managed		2387910
4. End of year, on hand estimate (difference between Line 1d and Line 3)	0	0

DIRECTIONS FOR SECTION B

- Enter the amount of Used Oil or Oily Waste collected in gallons for type code: Automotive, Industrial, and Mixed.
 - In State
 - from Out of State
 - Beginning Inventory from last year's ending amount
 - Enter the total sum of lines a + b + c
- Enter the amount of used oil managed by your facility by end use code (N, O, F, I, B, and D).
- Enter total amount in gallons of Used Oil managed.
- Enter the end-of-year on hand amount (difference between Line 1d and Line 3).

SECTION C USED OIL FILTERS (USE TABLE BELOW FOR CONVERSIONS)	In State	Out of State
1. Number of filters on hand from previous year	0	
2. Number of used oil filters collected	142,500	
3. Total number of used oil filters to manage (Line 1 plus Line 2)	142,500	
4. Disposition of used oil filters collected:		
a. Transferred to another registered facility	142,500	
b. Burned for energy recovery at a Waste-To-Energy facility	0	
c. Transferred directly to a metal foundry for recycling		
d. TOTAL	142,500	
5. End of year, on hand estimate (Line 3 minus Line 4d)	0	
6. Gallons of used oil collected as a result of filter processing	0	
7. Gallons of used oil transferred to a used oil handler (transporter or processor)	0	
8. Volume of oily waste collected and managed as a result of filter processing <input type="checkbox"/> gallons <input type="checkbox"/> cubic yards.....	0	
9. Description of oily waste management _____		

DIRECTIONS FOR SECTION C

Conversion Table

One 55 -gallon drum of crushed used oil filters = approximately 400 used oil filters
One 55 - gallon drum of uncrushed used oil filters = approximately 250 used oil filters
One ton of drained used oil filters = approximately 2,350 used oil filters

- Enter the number of Used Oil Filters on hand, from previous year's inventory.
- Enter the number of Used Oil Filters collected.
- Enter the sum of Line 1 + Line 2.
- Enter the number of filters managed by your facility in blocks 4a-c. Enter the sum of 4a-c in block 4d.
- Enter the number of filters on hand at your site as of December 31, last year.
- Fill in the number of gallons of used oil collected by your filter operation.
- Enter the number of gallons transferred to a used oil transporter or processor.
- List the volume (gallons or cubic yards) of the oily wastes collected through your filter handling. Oily wastes are identified in Florida Administrative Code Rule 62-710.201(1), and include wastewaters, filter residues or sludges, tank bottoms, sorbents, wipes, etc.
- Describe how oily wastes were managed (sent to a WTE, hazardous waste facility, landfilled after appropriate testing, etc.).

For assistance with this form, please contact the Used Oil Coordinator at 850-245-8707.

FEB 3 10:00:00

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

1. Evanston Insurance Company
(Name of Insurer)

(the "Insurer"), of 222 S. Riverside Plaza, Suite 2400 Chicago IL 60606
(Address of Insurer)

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

Raider Environmental Services of Florida, Inc., a wholly owned subsidiary of Heritage-Crystal Clean, LLC
(Name of Insured)

(the "Insured"), of 2000 Center Drive, Suite East C300 Hoffman Estates IL 60515
(Physical Address of Insured)

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

<u>EPA/DEP I.D. No.</u>	<u>Name</u>	<u>Physical Address</u>
FLR000143891	Raider Env Services of FL	4103 NW 132nd St., Opa Locka, FL 33055

FLR000176271	Raider Env Services of FL	5080 SR HWY 60 East Mulberry FL 33860
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(If coverage is for multiple facilities, identify each facility insured.)

This insurance is primary and the company shall not be liable for amounts in excess of \$ 20,000,000 for each accident, exclusive of legal defense costs. The coverage is provided under policy number MKLV3ENV101867, issued on 6/1/2020.
(date)

The effective date of said policy is 6/1/2020 and the expiration date of said policy is 6/1/2025.
(date)

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

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

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

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



(Signature of Authorized Representative of Insurer)

Michael Geasland

(Typed name)

Underwriting Specialist

(Title)

Authorized Representative of

Evanston Insurance Company

(Name of Insurer)

222 S. Riverside Plaza, Suite 2400, Chicago IL 60606

(Address of Representative)

ATTACHMENT 3

Revised DEP Form 62-710.901(6)

USED OIL PROCESSING FACILITY PERMIT APPLICATION

Part I

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

A. General Information

1. New _____ Renewal Modification _____ Date current permit expires August 12, 2023

2. Revision number _____

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

_____ Generators (Subpart C of Part 279)

Transporters (Subpart E)

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

Marketers (Subpart H)

_____ are disposing of used oil (Subpart I)

4. Date current operation began: January 1, 2011

5. Facility name: Raider Environmental Services of Florida, Inc., a wholly owned subsidiary of Heritage-Crystal Clean, LLC

6. EPA identification number: FLR000176271

7. Facility Location:

5080 State Road 60 East, Mulberry, FL, 33860
Street City State Zip Code

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

2000 Center Drive, Suite East C300, Hoffman Estates, IL, 60192
Street or P.O. Box City State Zip Code

9. Contact person: Kevin McIntyre Telephone: 863 - 582-6376

Title: Facility Manager Email: kevin.mcintyre@crystal-clean.com

Mailing Address:
2000 Center Drive, Suite East C300, Hoffman Estates, IL, 60192
Street or P.O. Box City State Zip Code

10. Operator's name: Mark DeVita Telephone: 847 - 783-5358

Email: mark.devita@crystal-clean.com

Mailing Address:
2000 Center Drive, Suite East C300, Hoffman Estates, IL, 60192
Street or P.O. Box City State Zip Code

11. Facility owner's name: Raider Realty, LLC Telephone: 305 - 949-9949

Email: steve@raiderenvironmental.com

Mailing Address:
210 SW 44th Avenue, Plantation, FL, 33317
Street or P.O. Box City State Zip Code

12. Legal structure:

- Corporation (indicate state of incorporation) Florida Corporation
- Individual (list name and address of each owner in spaces provided below)
- Partnership (list name and address of each owner in spaces provided below)
- Other, e.g., government (please specify) _____
- Individual, partnership, or business operating under an assumed name (enter the county and state where the name is registered) County _____ State _____

Name: Raider Environmental Services of Florida, Inc., a wholly owned subsidiary of Heritage-Crystal Clean, LLC
Mailing Address:
2000 Center Drive, Suite East C300, Hoffman Estates, IL, 60192
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: 09/30/2033

If leased, indicate: Land owner's name: Raider Realty, LLC
Mailing Address:
210 SW 44th Avenue, Plantation, FL 33317
Street or P.O. Box City State Zip Code

14. Name of professional engineer Blake T. Holcomb Registration No. 72381

Telephone: 904 - 363-3430 Email: blake.holcomb@wsp.com

Mailing Address:
9428 Baymeadows Road, Suite 400, Jacksonville, FL, 32256
Street or P.O. Box City State Zip Code

Associated with: WSP USA Inc.

B. SITE INFORMATION

1. Facility location:

County: Polk
Nearest community: Mulberry
Latitude: 27°53'38" Longitude: - 81°55'32"
Section: 8 Township: 30 South Range: 24 East
UTM # 17 / 408905 / 3085792 /

2. Facility size (area in acres): 6.313

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.

C. OPERATING INFORMATION

1. Hazardous waste generator status (SQG, LQG, etc.) VSQG

2. List applicable EPA hazardous waste codes:

D001, D006, D007, D008, D009, D018

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 _____ and was approved by the Department on _____. or

A current dollar cost estimate is labeled as Attachment 8, Section 3.0. 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 _____ . 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

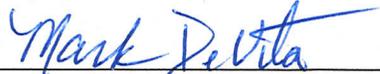
PART II - CERTIFICATION

TO BE COMPLETED BY ALL APPLICANTS

Form 62-710.901(6) Operator Certification

Facility Name: Raider Environmental Services of Florida, Inc. EPA ID# FLR000176271

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gathered and evaluated the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment or knowing violations. Further, I agree to comply with the provisions of Chapter 403, Florida Statutes, Chapters 62-701 and 62-710, F.A.C., and all rules and regulations of the Department of Environmental Protection



Signature of the Operator or Authorized Representative*

Mark DeVita, Vice President and CFO
Name and Title (Please type or print)

Date: 6/12/2023 Telephone: 847 - 783-5358

Email: mark.devita@crystal-clean.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: Raider Environmental Services of Florida, Inc. EPA ID# FLR000176271

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



Signature of the Operator or Authorized Representative*

Mark DeVita, Vice President and CFO
Name and Title (Please type or print)

Date: _____ Telephone: 847 - 783-5358

Email: mark.devita@crystal-clean.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: Raider Environmental Services of Florida, Inc. EPA ID# FLR000176271

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

Signature of the Operator or Authorized Representative*

Steve Obst, Owner
Name and Title (Please type or print)

Date: _____ Telephone: 305 - 949-9949 Email: steve@raiderenvironmental.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: FLR000176271 2. Tank Numbers: T1 through T8
3. Facility Name: Raider Environmental Services of Florida, Inc., a wholly owned subsidiary of Heritage-Crystal Clean, LLC
4. Facility Address: 5080 State Road 60 East, Mulberry, FL, 33860

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

Blake T. Holcomb
Name (please type)

Florida Registration Number: 72381

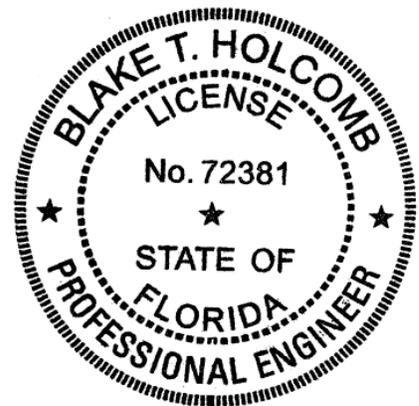
Mailing Address: 9428 Baymeadows Road, Suite 400
Street or P. O. Box
Jacksonville, FL, 32256

City State Zip

Date: _____ Telephone 904 - 363-3430 :

Email: blake.holcomb@wsp.com

[PLEASE AFFIX SEAL]



THIS ITEM HAS BEEN DIGITALLY SIGNED AND SEALED BY BLAKE T. HOLCOMB ON THE DATE ADJACENT TO THE SEAL. PRINTED COPIES OF THIS DOCUMENT ARE NOT CONSIDERED SIGNED AND SEALED AND THE SIGNATURE MUST BE VERIFIED ON ANY ELECTRONIC COPIES.

ATTACHMENT 4

Revised Tracking Plan

Tracking Plan and Oil /Water Separator

TRACKING PLAN

Facility Name - Raider Environmental Services of Florida, Inc., a wholly owned subsidiary of Heritage-Crystal Clean, LLC

Address – 5080 State Road 60 East, Mulberry, FL, 33860

EPA Identification Number – FLR000176271

Raider Environmental Services of Florida, Inc. (Raider) maintains records of all materials transported from and received at the Raider facility for a minimum of three years. Incoming materials (used oil, oily water, oily wastes, antifreeze, PCW, and industrial wastewater) are tracked by completion of Daily Route Logs (completed by the driver) and Permanent Daily Report Sheet.

Each driver must submit a "Daily Route Log" to accompany the bill of lading and/or manifests. Bill of Ladings and/or manifests are in accordance with the requirements specified in 40 CFR 279.56(a). The corresponding information is then entered into the facility's "Permanent Daily Report". Bill of lading and manifests will be kept on-site and are filed by the driver, by month at the facility. On occasion, an independent used oil hauler may deliver materials to the facility. A manifest is generated for each independent hauler and the information is entered into the electronic "Oil Purchase" spreadsheet (hardcopy generated weekly).

The "Permanent Daily Report" information is maintained at the Raider's Mulberry facility. The total volumes collected by Raider are added directly to the "Weekly Used Oil Collection Report." Copies of the reports generated weekly will be retained at the facility for at least three years. Copies of the "Daily Route Log," "Permanent Daily Report," and the "Weekly Used Oil Collection Report" are included as part of this section.

Tank inventory records are filed daily. These records are also retained for a 3-year period. Analytical results performed by an independent laboratory to verify the on-specification claim will be maintained until the closure of the facility, in accordance with 40 CFR 279.57. Analyses concerning rebuttal materials (materials that did not meet the waste acceptance procedure requirements) will also be maintained in accordance with 40 CFR 279.57. Reports and records concerning the implementation of the contingency plan will be maintained for the life of the facility.

OIL/WATER SEPARATORS

Oil/water separators are devices commonly used for wastewater discharges (Figure I). The effluent from oil/water separators is typically discharged to either a sanitary sewer system or a storm sewer. The properly designed, installed, and operated, oil/water separators provide a treatment system for handling oily wastewater that prevents the entry of unacceptable levels of contamination to a storm sewer or sanitary sewer.

According to Stoke's Law, a 100-micron diameter oil droplet will rise approximately 6 inches in water every ten minutes. A 20-micron oil droplet will take over two hours to rise the same distance. Because an oil droplet must rise approximately 48 inches to reach the water surface in a typical gravity-type oil/water separator, smaller droplets may pass through uncollected. Coalescing (binding together) the smaller oil droplets makes them larger and more buoyant, causing them to rise faster. Coalescing oil/water separators may use inclined plates placed within the separation chamber, which provide only a short vertical distance (1/4-inch) for the small droplets to travel before they encounter a fixed surface. Here they can coalesce with other droplets and continue to rise along the plates to the water's surface. Another coalescing method uses a filter made of oleophilic (oil "loving") fibers such as polypropylene. Fine oil droplets attach to the fibers as the wastewater flows through. As the droplets get larger, they become buoyant enough to detach from the fibers and rise to the surface, where they can be collected.

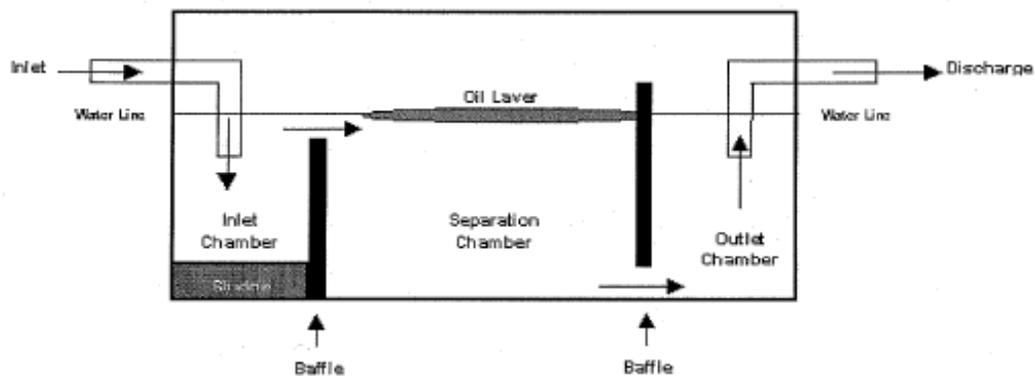


Figure I. Conceptual Diagram of a Simple Gravity Oil/Water Separator. In a gravity-operated oil/water separator, the oil wastewater is introduced through the system inlet. Water turbulence is calmed in the inlet chamber behind the first baffle, where solids settle out and form sludge on the bottom of the chamber. As the wastewater flows over the first baffle to the middle, or separation, chamber, oil droplets rise to the surface and are trapped behind a second, higher baffle, which has an opening along its edge. The remaining water passes under the second baffle into the outlet chamber, where it is diverted to a discharge point. Consequently, solid sludges can be collected from the bottom of the inlet chamber and oil droplets that accumulate at the water's surface in the separation chamber can be skimmed off or otherwise routed to a separate holding tank.

OPERATIONS AND MAINTENANCE

Eliminate unpermitted pollutants and prohibit the discharge of wastewater from industrial operations containing hazardous wastes and heavy metals.

Implement dry cleanup procedures and only use floor drains to carry residual amounts of floating petroleum pollutants. Plug floor drains into oil/water separators that carry industrial wastewater from maintenance shops. Collect, treat, and dispose of industrial waste separately.

Establish a primary office of responsibility (to include the functional organization for the management of pollutants discharged and for maintenance of oil/water separators) that understands and has direct control over these functions.

Remove and test oil/water separator sludge regularly before disposal to ensure compliance with sludge disposal requirements. If sludge is hazardous, take immediate actions to identify and eliminate sources of hazardous pollutants. Dispose of sludge as hazardous waste and retest wastewater from oil/water separator to assure compliance.

GENERAL CONSIDERATIONS

Oil/water separators are typically simple devices. However, several factors that could potentially affect the safety, efficiency, and proper management must be given careful consideration before the installation or modification of any oil/water separator.

Flow Rate

In general, the effectiveness of an oil/water separator in separating the oil phase is increased by slower wastewater flow rates into the separator and longer “residence times” (i.e., the period of time that the wastewater remains in the oil/water separator). When the wastewater enters the receiving chamber of the separator, the velocity and turbulence of the fluid is reduced allowing heavier-than-water solids to settle, while larger oil droplets rise to the water’s surface. Further separation continues in the middle chamber where smaller droplets of oil rise (more slowly) to the water’s surface and join the larger droplets. The remaining wastewater, once it has passed under the second baffle to the outlet chamber, is discharged (with proper authorization and/or permitting) to a local stormwater or sanitary sewer system.

Design Capacity

An oil/water separator has upper limits to the amounts of oil and sludge that can effectively accumulate while it is in operation. If too much oil accumulates in the receiving and middle chambers, it may flow into the wastewater outlet and end up being discharged into the environment. Proper oil/water separator design will ensure the separator capacity is sized to meet the needs of the process.

Emulsifying Agents

Detergents and soaps designed to remove oily grime from equipment, vehicles, or other components can adversely affect the operation of a gravity oil/water separator. These types of emulsifying agents are specifically formulated to increase the dispersal of oil into tiny drops in water, which is why they are such good cleaners. When these soapy wastewaters enter the oil/water separator, it takes significantly longer for the oil to separate, if it can, from the water. Excessive use of detergents can render an oil/water separator inefficient by completely emulsifying oils into the wastewater stream and allowing them to pass through the system. Low-emulsifying soaps are available that allow oil separation to occur more quickly after the soapy water enters the oil/water separator.

Maintenance Practices

The ability of oil/water separators to function properly depends upon the timely performance of required service and maintenance. Oil/water separators must be monitored and maintained by competent personnel who understand how the systems operate. Oil/water separators should be given the same close attention given to any other important piece of equipment. The operators, users, and maintainers of the oil/water separator must clarify who will be responsible for monitoring, inspecting, maintaining, and servicing the system. Frequent inspections should be made of the system and all associated piping, valves, etc. to prevent operational and mechanical failures or inefficiencies. Sludges and oils that are not periodically removed from oil/water separators can render it inoperative.

Additionally, leaks from oil/water separators can result in environmental pollution, which can trigger costly investigative studies and cleanups. Rigorous implementation of an oil/water separator inspection and maintenance plan can prevent discharges from the oil/water separator that may contaminate the environment.

ATTACHMENT 5

Revised Unit Management Plan

Unit Management Plan

UNIT MANAGEMENT PLAN

If a container holding waste is not in good condition (e.g., severe rusting, apparent structural defects) or if it begins to leak. Raider personnel will transfer the waste from this container to a container that is in good condition. At least weekly, Raider personnel inspect areas where containers are stored, looking for leaking containers, and for deterioration of containers. Raider maintains aisle space (at least 24 inches) to allow the unobstructed movement of personnel fire protection equipment, spill control equipment, and decontamination equipment to any area of the facility operation in an emergency.

All of Raider's aboveground storage tanks are located within a Tank Farm containment area located west of Building 4. The containment system is free of cracks or gaps and is sufficiently impervious to contain leaks, spills, and accumulated precipitation until the material is removed. A secondary containment summary is provided (See APPENDIX 7A). The containment system has a capacity greater than 110% of the volume of the largest container (See APPENDIX 7B for Secondary Containment Calculations). The precipitation, which enters the tank storage area and the secondary containment area is pumped into the onsite water storage tanks for treatment.

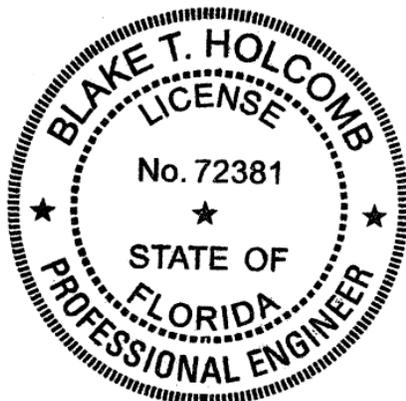
All aboveground used oil process and storage tanks are properly labeled with the words "Used Oil" (See APPENDIX 7C for Oil Type and Capacities). All tanks at Raider are steel aboveground storage tanks. All oil piping is aboveground so there is no contact with the soil.

Any new aboveground storage tanks constructed of steel will meet or exceed the requirements found in UL No. 142, API Standard No. 620, API Standards No. 650, API Standard No. 12B, API Standard No. 12D, or API Standard No. 12F. (See APPENDIX 7D for tank integrity testing schedule for existing tanks).

Raider inspects the aboveground tanks and piping for leaks as part of a release detection-monitoring program. At least once a month, Raider personnel inspect the exterior of each tank and the secondary containment area for wetting, discoloration, blistering, corrosion, cracks, or other sign of structural damage or leakage.

In the event any component of Raider's storage tank system is discovered to have discharged or contributed to the discharge of a pollutant, Raider personnel will isolate that component from the system, if possible, and not utilize that component until it is correctly repaired or replaced. If the storage tank system or any component of the system cannot be operated in compliance with Chapter 62-762 F.A.C., the storage tank system will not be operated until the component has been repaired or replaced. If a tank has discharged or contributed to the discharge of a pollutant, that tank will be taken out of service until the tank is repaired or replaced. All repairs to storage tanks will be made in a manner preventing any discharge from the storage tank system due to structural failure or corrosion for the remaining life of the storage tank system. All repairs to damage or defective storage tank system components shall be made to restore the structural integrity of the storage tank system. All pipe sections and fittings from which a pollutant has been discharged or which is otherwise damaged or defective will be repaired in accordance with the manufacturer's specifications or in accordance with Rule 62-762.210 F.A.C.

The secondary containment system will be repaired as necessary to maintain product tightness and containment volume of the system, including, but not limited to sealing cracks in concrete, repairing punctures, and maintaining containment walls.



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APPENDICES

Appendix 7A – Secondary Containment Summary
Appendix 7B – Secondary Containment Calculations
Appendix 7C – Oil Type and Capacities
Appendix 7D – Tank Integrity Testing Schedule

**APPENDIX 7A
SECONDARY CONTAINMENT SUMMARY**

Tank Number/Description	Location	Volume of Largest Container (Gallons)	Containment Capacity (Gallons)	Capacity Needed ¹ (Gallons)	Containment Construction	
					Material	Sufficiently Impervious
Tank Farm	West of Building 4	26,500	39,602	29,150	Concrete	Yes

¹ Industry standard - 110% capacity of largest tank within secondary containment area.

**APPENDIX 7B
SECONDARY CONTAINMENT CALCULATIONS**

A) Gross Total Available Volume –

Tank Farm		
Length	119.3	ft
Width	36.9	ft
Depth	1.3	ft
Total Gross Volume	5,723	ft ³
Total Gross Volume	42,808	Gallons

B) Reduction in Total Volume –

Saddles for horizontal tanks within Tank Farm		
Length	9.16	ft
Width	1.5	ft
Depth	1.3	ft
No. of saddles	24	
Total Gross Volume	428.69	ft ³
Total Gross Volume	3,206	Gallons

C) Total Available Volume Meets/Exceeds the Requirements –

Largest Tank Volume	26,500	Gallons
110% Largest Tank	29,150	Gallons
Total Volume Available	39,602	Gallons

Secondary containment meets 110% criteria.

**APPENDIX 7C
OIL TYPE AND CAPACITIES**

Description	Date Installed	Location	Material of Construction	Oil Type	Total Oil (Gallons)
Tank 1	2012	Tank Farm	Carbon Steel	Oily Water	20,000
Tank 2	2012	Tank Farm	Carbon Steel	Oily Water	20,000
Tank 3	2012	Tank Farm	Carbon Steel	Processing Tank	26,500
Tank 4	2012	Tank Farm	Carbon Steel	Used Oil	20,000
Tank 5	2012	Tank Farm	Carbon Steel	Used Oil	20,000
Tank 6	2012	Tank Farm	Carbon Steel	Used Oil	20,000
Tank 7	2012	Tank Farm	Carbon Steel	Used Oil	20,000
Tank 8	2012	Tank Farm	Carbon Steel	Used Oil	20,000
Total Stationary Tank Capacity: 166,500 Gallons					

**APPENDIX 7D
TANK INTEGRITY TESTING SCHEDULE**

Tank Number	Location	Tank Size (Gallons)	Install Date	Last Tested	Testing Method	Next Test
Tank 1	Tank Farm	20,000	2012	No Records	Baseline NDT/API 653/STI SP001	Within 5 Years
Tank 2	Tank Farm	20,000	2012	No Records	Baseline NDT/API 653/STI SP001	Within 5 Years
Tank 3	Tank Farm	26,500	2012	No Records	Baseline NDT/API 653/STI SP001	Within 5 Years
Tank 4	Tank Farm	20,000	2012	No Records	Baseline NDT/API 653/STI SP001	Within 5 Years
Tank 5	Tank Farm	20,000	2012	No Records	Baseline NDT/API 653/STI SP001	Within 5 Years
Tank 6	Tank Farm	20,000	2012	No Records	Baseline NDT/API 653/STI SP001	Within 5 Years
Tank 7	Tank Farm	20,000	2012	No Records	Baseline NDT/API 653/STI SP001	Within 5 Years
Tank 8	Tank Farm	20,000	2012	No Records	Baseline NDT/API 653/STI SP001	Within 5 Years