



**August 8, 2024**

**Shelby Luong**  
**Environmental Specialist II**  
**Florida Department of Environmental Protection**  
**Southeast District – West Palm Beach**  
**3301 Gun Club Road – MSC 7210-1**  
**West Palm Beach, FL 33406**  
[Shelby.Luong@floridadep.gov](mailto:Shelby.Luong@floridadep.gov)

**Subject: Ft. Lauderdale TRANSFLO Terminal – FLD984253542**  
**Routine Compliance Evaluation Inspection (CEI) Request for Additional Information**

Dear Ms. Luong,

TRANSFLO Terminal Services, Inc. (TRANSFLO) received a request for additional information<sup>1</sup> from the Florida Department of Environmental Protection (FDEP) regarding the recent Routine Compliance Evaluation Inspection (CEI) conducted at the Fort Lauderdale TRANSFLO Terminal (Terminal) located at 890 SW 21<sup>st</sup> Avenue, Fort Lauderdale, Florida. A call was held to discuss the response, and it was decided that some of the information requested did not apply to the Terminal<sup>2</sup>.

This letter is submitted to provide the additional information requested. Each item requested is addressed separately in this letter, as follows.

### **Background**

TRANSFLO is a wholly-owned subsidiary of CSX Corporation and an affiliate of CSX Transportation, Inc. ("CSXT"). Working in conjunction with CSXT, TRANSFLO provides services to its customers by making available facilities where commodities and materials can be safely transloaded directly between rail cars and trucks to facilitate the transportation of such commodities and materials from the point of origin to the point of destination. TRANSFLO's facilities handle almost exclusively commodities and materials that are in liquid form and are therefore transloaded from rail tank cars to tank trucks and vice versa for the purpose of continuing the movement of such commodities and materials in commerce. The commodities and materials are owned by third parties and pass through TRANSFLO's facilities in route to their ultimate destinations. TRANSFLO's facilities serve as neither original shipping locations nor

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<sup>1</sup> Email Subject: Exit Interview - Ft Lauderdale Transflo Terminal (FLD984253542) from Ms. Shelby Luong, Florida Department of Environmental Protection, July 23, 2024.

<sup>2</sup> Telephone meeting on August 6, 2024, Shelby Luong and Kaitlyn Taylor, of FDEP, and Lisa Wiedemann, Consultant to TRANSFLO.



ultimate shipping destinations. Rather, they are intermodal transloading facilities used to transfer commodities and materials from one mode of transportation to another in the normal course of transportation.

Rail service for carrying commodities and materials to and from TRANSFLO's facilities is primarily provided by CSXT. However, rail cars may originate at or move to points anywhere in North America. Moreover, rail cars may be moved by multiple railroads as part of the transportation process. Trucking services are provided by independent third parties and are arranged for by those shipping or receiving the commodities and materials.

### **Requested Information**

#### ***Item 1: When did the facility begin operations?***

TRANSFLO began operations at the Fort Lauderdale Terminal approximately in January 1991.

#### ***Item 2: What is the square footage of the facility?***

The Terminal is approximately 8.4 acres.

#### ***Item 3: Acceptance records of used oil from the year 2022 per 40 CFR 279.46(a)***

Used oil is transported by, or on behalf of, customers to TRANSFLO via trucks to the Terminal where the used oil is transferred directly from the trucks to rail cars. At no time is the used oil temporarily stored in stationary tanks or containers at the Terminal. Once the used oil has been transloaded onto rail cars (which are not owned by TRANSFLO), the used oil continues in transportation via rail to one of the customer's facilities where the used oil is re-refined. A sample of an acceptance record of a used oil transfer from 2022 is attached (Attachment 1).

#### ***Item 4: Delivery records of used oil from year 2022 per 40 CFR 279.46(b).***

Used oil is transported by, or on behalf of, customers to TRANSFLO via trucks to the Terminal where the used oil is transferred directly from the trucks to rail cars. At no time is the used oil temporarily stored in stationary tanks or containers at the Terminal. Once the used oil has been transloaded onto rail cars (which are not owned by TRANSFLO), the used oil continues in transportation via rail to one of the customer's facilities where the used oil is re-refined. A sample of a delivery record of a used oil transfer from 2022 is attached (Attachment 1).

#### ***Item 5: Records of rejected/refused oil shipments from the year 2022 per Rule 62-710.510(2) F.A.C.***

There were no rejected or refused oil shipments at the Terminal.



**Item 6: Halogen content testing records for the year 2022 per 40 CFR 279.44(b).**

TRANSFLO does not conduct halogen content testing on the used oil transported to the Terminal by the customer's trucks, as all halogen content testing on used oil shipments is conducted by the customer, as the transporter, prior to the used oil's transport to the Terminal for transfer into the customer's rail car. TRANSFLO is not a Transporter, but a Transfer Facility.

**Item 7: SPCC Plan (most current edition) per 40 CFR 112.1(e).**

The SPCC regulations expressly do not apply to transportation-related facilities that are subject to the Department of Transportation's (DOT) jurisdiction. The 1971 Memorandum of Understanding (MOU) between the Environmental Protection Agency (EPA) and the DOT explicitly states that transportation facilities encompass highway vehicles and railroad cars that are used to transport oil in interstate and intrastate commerce. EPA has confirmed that the jurisdictional dividing line described in the 1971 MOU continues to delineate the scope of the SPCC regulations. Along with EPA's pronouncements, DOT has clarified the type of transportation activities that fall within its jurisdiction. Transportation functions that are subject to DOT's jurisdiction (and therefore fall outside of EPA's jurisdiction for purposes of the SPCC regulations) include transloading activities and storage incidental to movement. The used oil that is transloaded at the Terminal is simply moving from one form of transportation to another. The used oil is collected at points of generation (i.e., points of origination) and transported by truck to the Terminal where it is directly transferred into rail cars to continue in transportation to the ultimate receiving facilities. Under such circumstances, we believe that the rail cars carrying used oil are subject to the jurisdiction of DOT as are the trucks transporting used oil to be placed on the rail cars and the transloading activities themselves. Accordingly, the transloading of used oil at the Terminal does not trigger the requirements in the SPCC regulations to prepare an SPCC plan.

**Item 8: Hazardous waste manifests from the years 2022, 2023, and 2024 per Rule 62-730.160(3) F.A.C.**

The Terminal has not generated, nor disposed of, any hazardous waste during the previous 3 years.

**Item 9: Training records of all facility personnel who handle used oil from the year 2022 per Rule 62-710.600(2)(c) F.A.C.**

The Terminal provides training for the personnel who handle used oil through their internal "Used Oil 35/ Day/HazWaste 10 Day (RM-YO-1103)" for the used oil transfer process. A copy of the training log sheet is attached (Attachment 2).



**Item 10: Service receipts of the parts washer**

The parts washer is serviced by Safety-Kleen Systems. A copy of the service receipt is attached (Attachment 3).

**Item 11: Lead acid battery recycling receipts**

Lead acid batteries are recycled through Napa Auto Parts through a core exchange program. A copy of a service receipt is attached (Attachment 4).

**Item 12: Documentation showing that the concrete in the storage area is oil-impermeable per Rule 62-710.401(6) F.A.C.**

TRANSFLO is currently reviewing this item to determine if the concrete in the drum storage area has been sealed with an oil-impermeable coating. TRANSFLO will provide an update to this item by August 16, 2024.

**Item 13: Waste determination on the phosgene pesticide per 40 CFR 262.11.**

TRANSFLO transfers bulk flour between railcars and trucks. The railcars contain phosgene gas strips for fumigation. A third-party fumigation company has staged a drum where they store the removed phosgene gas strips after the railcars are cleared of the gas. This is a new process for the Terminal and no removals have occurred. TRANSFLO was told that the gas strips inside the drum are not deemed a waste while on-site. The third-party fumigation company will remove the drum from the site once deemed safe to do so. They have determined that the gas strips are non-hazardous waste and provided the SDS (Attachment 5).

**Item 14: Financial liability insurance on vehicles with a combined single limit of no less than \$1,000,000.00 per Rule 62-710.600(2)(e).**

TRANSFLO provides a location and means (such as pumps or hoses) to facilitate the transfer of commodities, including used oil, from customer-owned trucks to customer owned/leased railcars (or railcar to truck). TRANSFLO does not transport used oil over public highways at any time. TRANSFLO received an email from FDEP stating that due to the operations are by rail only and not transporting over public highways at any time, evidence of liability insurance is not required. A copy of the email is attached (Attachment 6).

**Item 15: Photo documentation of the validated used oil registration form and identification number in a prominent place at the facility per Rule 62-710.500(4) F.A.C.**

A photograph of the posted Used Oil Registration is attached (Attachment 7).



If you have any questions or concerns regarding the enclosed information, please contact me at (904) 359-2279 or via email [rprewitt@transflo.net](mailto:rprewitt@transflo.net).

Sincerely,

**Ryan Prewitt**  
Manager – Chemical Safety

*Attachments:*

- Attachment 1 – Used Oil Acceptance Records*
- Attachment 2 – Training Records*
- Attachment 3 – Parts Washer Service Receipts*
- Attachment 4 – Lead Acid Battery Exchange Receipt*
- Attachment 5 – Phosgene Pesticide Waste Determination*
- Attachment 6 – Notification of Regulated Waste Activity Submittal*
- Attachment 7 – Used Oil Transfer Facility Registration Photo Documentation*

**Attachment 1**  
**Used Oil Acceptance/Delivery Records**

# Inbound Liquid Load Inspection Form

Terminal: **FT LAUDERDALE - FT LAUDERDALE, FL**

Consignee:

Shipper: **HERITAGE-CRYSTAL CLEAN LLC**

Commodity: **OILY WATER (FT LAUD)**

Carrier: **HERITAGE CRYSTAL CLEAN LLC**

Inbound Seals \_\_\_\_\_

Lot#: \_\_\_\_\_ Grade: \_\_\_\_\_

Start: 0952 Stop: 10:57

RC Capacity

Audit #: **138058**

Load Date: **04/07/2022 11:00 am**

Shipper#: **80634-4**

Quantity: **45,000 LBS**  
( **5,114 GAL** )

Vehicle Trailer#: 115

Sample(s) Required: Yes ( ) No ☒

Standard aw

Replenishment ( )

Product Return ( )

Load Limit \_\_\_\_\_ Glns \_\_\_\_\_

Loc	Car Number	Compartment	Loader	Verifier	Curr WT.	LBS	Gallons
<b>TRACK 3 - 5</b>	<b>GATX 80634</b> <u>rw</u>		<u>aw</u>	<u>MB</u>	<b>3,980</b>	<b>45,000</b>	<b>5,114</b>
Comment: <b>29745 MAX CAP - 195300LOAD</b>							

Driver signature verifies (1) product was discharged in to railcar number listed above,  
(2) motor vehicle equipment meets DOT requirements for this commodity, and  
(3) driver is wearing appropriate personal protective equipment:

AX

## Truck / Trailer Inspection

	Yes	No	N/A		Yes	No
Seals Intact (If applicable)	( )	( )	( )	Can Railcar Assigned Hold the quantity ordered?	(X)	( )
Driver wearing appropriate Safety Equipment	( )	( )				
Placards Match Railcar	( )	( )	( )			
Product Appearance Normal	( )	( )		Transfer Equipment in Good Operation Condition?	(X)	( )
No leaks detected/no signs of leakage	( )	( )				
Transfer Inspection Date Valid	( )	( )				
RC Starting Inches <u>52"</u> (if applicable)				RC Ending Inches <u>70"</u> (if applicable)		

Special Instructions/Loader Comments:

Used: P1323 Equipment

Temp: \_\_\_\_\_ Product

Loader(s) Signature aw Date: 4-7-22

Date: \_\_\_\_\_

120457

# Inbound Liquid Load Inspection Form

Terminal: FT LAUDERDALE - FT LAUDERDALE, FL

Consignee:

Shipper: HERITAGE-CRYSTAL CLEAN LLC

Commodity: OILY WATER (FT LAUD)

Carrier: HERITAGE CRYSTAL CLEAN LLC

Inbound Seals

Lot#: Grade:

Start: 9:52 Stop: 10:57

RC Capacity

Audit #: 138058

Load Date: 04/07/2022 11:00 am

Shipper#: 80634-4

Quantity: 45,000 LBS  
( 5,114 GAL)

Vehicle Trailer#: 115

Sample(s) Required: Yes ( ) No ( )

Standard ( )

Replenishment ( )

Product Return ( )

Load Limit Glns

Loc	Car Number	Compartment	Loader	Verifier	Curr WT.	LBS	Gallons
TRACK 3 - 5	GATX 80634		PW	MA	3,980	45,000	5,114

Comment: 29745 MAX CAP - 195300LOAD

- Driver signature verifies (1) product was discharged in to railcar number listed above,  
(2) motor vehicle equipment meets DOT requirements for this commodity, and  
(3) driver is wearing appropriate personal protective equipment:

## Truck / Trailer Inspection

	Yes	No	N/A		Yes	No
Seals Intact (If applicable)	( )	( )	( )	Can Railcar Assigned Hold the quantity ordered?	( )	( )
Driver wearing appropriate Safety Equipment	( )	( )				
Placards Match Railcar	( )	( )	( )			
Product Appearance Normal	( )	( )		Transfer Equipment in Good Operation Condition?	( )	( )
No leaks detected/no signs of leakage	( )	( )				
Transfer Inspection Date Valid	( )	( )				
RC Starting Inches (if applicable)				RC Ending Inches (if applicable)		

Special Instructions/Loader Comments:

Equipment Used:

Product Temp:

Loader(s) Signature: Date:





10:58 04/07/22

AUDIT # 138058

81820 1b

27880 1b PT

53940 1b N

*m*

*6/30*

TRUCK I.D. 159

115  
(TRAILER I.D.)

DRIVER ☒ ON  
☐ OFF HCC

AUDIT/I.D.# 138058

*[Signature]*  
(QUALIFIED WEIGHER)

138058

TRANSFLO Customer Inventory Management

Driver Lookup Shipment Notices RailCar Trace Transfer Orders Terminal Management

VC# 120457

Audit / Pick Up # 138058

Created By 7/6/2022 14:50:15

Verified By

Card

CMS Wagon

BOL

Lead Pkg.

Entity: lbs 45000

Work Order Detail

SCHEDULED INBOUND Audit# 138058

FT LAUDERDALE - FT LAUDERDALE, FL - 170

HERITAGE-CRYSTAL CLEAN LLC(I1U80M) - ATTN CORPORATE LOGISTICS PO #1760 - ELGIN,IL - STEVE JOHNSON

Update

Transfer Order Selection Transfer Order

Shipper#: 80634-4 Order Date: 04/06/2022 02:45 pm

Product: OILY WATER (FT LAUD) Service: PREMIUM

Schedule Date\*: 4/7/2022 11:00 AM PM

Transfer Type: W - Waste (Non Hazardous)

Trucker/Carrier: HERITAGE CRYSTAL CLEAN LLC - 2503 WEST LAMBERT STREET, SUITE A - INDIANAPOLIS, IN - HCCR

Trailer: Minimum Weight Applies

Seals

Work Order

Comments:

Lot#: Grade:

OILY WATER (FT LAUD)										**REQUIRED**		
Loader: << Select Loader >>				Equipment: <>								
<< Select Equipment >>												
Inventory Store Status	Bin#	Railcar Inventory	Location Spot	CP/Arrived Date	Comment Lot# Grade	Vessel Quantity	Remaining Capacity	Available Quantity	Remaining Capacity w/ Scheduled	Outage Capacity Remaining	Plant Quan	
GATX 80634 ARRIVED	ALL	8 Inches	TRACK	4/3/2022	Comment: 29745 MAX CAP - 195300LOAD VF Code: 120457	3,980 LBS	191,320 LBS	3,980 LBS	56,320 LBS	93 Inch-Gallons 70 Inch-Pounds Report	45000	
		580										
		Gallons										
		3980										
		Weight	5									

Quantity Ordered: 45,000 LBS Total 45000

Update

Verify Work Order

Transfer Order Selection Transfer Order

Audit#

Select





# Environmental Manifest

Emergency Contact Telephone Number  
(877)316-0633

13982040722-42

<b>Waste Manifest</b>	<b>Generator's EPA ID No.</b> <b>FLR0001439891</b>	<b>Manifest Document No.</b> <b>13982040722</b>	<b>Page 1 of 1</b>	<b>Acct# Number</b>
<b>Name and Mailing Address:</b> <b>HERITAGE CRYSTAL CLEAN</b> <b>JASON VALDEZ 4103 NW 132ND STREET</b> <b>OPA LOCKA State FL Zip 33054</b> <b>Phone : (305) 994-9949</b>		<b>Generator's Site Address:</b> <b>HERITAGE CRYSTAL CLEAN</b> <b>JASON VALDEZ</b> <b>4103 NW 132ND STREET</b> <b>OPA LOCKA State FL Zip 33054</b>		
<b>Transporter 1 Company Name</b> Raider Environmental Service Inc.	<b>USA EPA ID Number</b> FLR0001439891	<b>Transporter's Phone</b> 305-994-9949		
<b>Transporter 2 Company Name</b>	<b>USA EPA ID Number</b>	<b>Transporter's Phone</b>		
<b>Designated Facility Name and Site Address</b> Heritage-Crystal Clean, LLC. 115146 Intracoastal Drive New Orleans, LA 70129	<b>USA EPA ID Number</b>	<b>Facility's Phone</b> 877-938-7952		

Shipping Name and Description	17. Containers		18.	19.
	No.	Type	Total Quantity	Unit W/Vol
A. NON DOT / Non RCRA- Oily Water	1	TI	6000	gl
B.				
C.				
D.				

**Description of Work:**

TK# \_\_\_\_\_ RC# CIATX 80634  
 TL# \_\_\_\_\_ Load# \_\_\_\_\_

Lvg RES: 8:20 On Site: 7:20 LVG Site: \_\_\_\_\_ Total Site: \_\_\_\_\_ Rtn Res: \_\_\_\_\_  
 Service Date: 1/1/22 Driver: Brian Farmer Tech: \_\_\_\_\_ TRK: 11289

Additional Information

**CERTIFICATION:** This is to certify that the above named materials are properly classified, described, packaged, marked and labeled, and are in proper condition for transportation according to the applicable regulation of the Department of Transportation. I certify the materials described above on this manifest are not subject to federal regulations for reporting proper disposal of Hazardous Waste.

Printed/Typed Name	Signature	Month	Day	Year
Transporter 1 Acknowledgement of Receipt of Materials				
Printed/Typed Name	Signature	Month	Day	Year
Transporter 2 Acknowledgement of Receipt of Materials				
Printed/Typed Name	Signature	Month	Day	Year

Discrepancy Indication Space

Facility Owner or Operator: Certification of receipt of materials.

Signature \_\_\_\_\_ Month \_\_\_\_\_ Day \_\_\_\_\_ Year \_\_\_\_\_

**TERMS CONDITIONS:** Customer agrees that work has been performed satisfactorily. Payment is due upon completion of services. Where Raider extends credit, a charge of 1.5% per month, 18% per annum, will be added to balances unpaid 30 days after invoice date. Collection costs and/or reasonable Attorney's fees will be due in the event any collection process becomes necessary. This is not an invoice, but merely an estimate of charges. Applicable taxes, tariffs and fuel surcharges will be forwarded on invoice.



# Truck Arrival Checklist



Note: For inbound loads the carrier must complete "inbound" checklist for information that is incomplete or missing from the manifest. Otherwise, attach a copy of the manifest to the order.

I / B	1.1A Arrival Date: <b>04/07/2022</b>	1.1B Scheduled Loading time: <b>9:30</b>	1.1C Audit Pickup/ Manifest #: <b>138058</b>
	1.1D Tractor Number: <b>159</b>	1.1E Trailer Number: <b>115</b>	1.1F Carrier: <b>HERITAGE CRYSTAL CLEAN LLC</b>
	1.1G If carriers transfer equipment is being utilized for the transfer, is it in sound operating condition? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>		
	1.1H Product contained in trailer? <b>water</b>		1.1I Quantity in Trailer? lbs. / gals. <b>6000</b>
	2.1A Arrival Date:	2.1B Scheduled Loading time:	2.1C Audit Pickup/ Manifest #:
	2.1D Tractor Number:	2.1E Trailer Number:	2.1F Carrier:
	2.1G Is the trailer/compartments empty? Yes <input type="checkbox"/> No <input type="checkbox"/>		2.1H Trailer dedicated to product to be transferred? Yes <input type="checkbox"/> No <input type="checkbox"/>
	2.1I Product last contained in above trailer?		2.1J Product to be transferred?
	2.1K Consignee: Destination:		2.1L City & State:
	C a r r i e r  O u t b o u n d s	2.1M: Shipper:	
2.1O: Has trailer been washed/blown out?: Yes <input type="checkbox"/> No <input type="checkbox"/> Product Reload <input type="checkbox"/>		2.1P Valves capped & closed? Yes <input type="checkbox"/> No <input type="checkbox"/>	
2.1Q If product to be loaded is HazMat do you have MSDS?: Yes <input type="checkbox"/> No <input type="checkbox"/>		2.1R Compartments are marked? Yes <input type="checkbox"/> No <input type="checkbox"/>	
2.1S Trailer capacity: Comp 1      Comp 2      Comp 3      Comp 4      Comp 5			
2.1T Quantity Ordered:      lbs      gals		2.1U Can trailer hold quantity ordered? Yes <input type="checkbox"/> No <input type="checkbox"/>	
**By signing below the driver hereby certifies that they have reviewed the content of the above pre-populated applicable data fields for accuracy, and have answered truthfully to the best of their knowledge all the above data fields and/or questions pertaining to either the order and/or trailer. The aforementioned trailer is roadworthy and capable for the scheduled transfer. **			
Driver Name: (Printed) <b>Brian Farmer</b> Date: <b>4/7/22</b>			
Driver Signature: <i>[Signature]</i>			

I / B	Audit Number: <b>138058</b>		
	1.2A: Has a copy of inbound manifest been obtained?: Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> Product Reload <input type="checkbox"/>		1.2B TYPE: Standard <input checked="" type="checkbox"/> Replenishment <input type="checkbox"/> Return <input type="checkbox"/>
	1.2C Is the material inside the current railcar compatible with the contents of the trailer? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>		
	1.2D Can the railcar assigned for this transfer contain the quantity ordered? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>		
	Audit Number:		2.2A Shipper Order/Ref# matches section 2.1C      # Assigned by Operation <input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/>
	2.2B Can trailer take quantity ordered? Yes <input type="checkbox"/> No <input type="checkbox"/>		2.2C If no, reason?      Heavy Tare <input type="checkbox"/> Capacity Limit <input type="checkbox"/> (CSR to make adjustments to the pickup weight in CIMS)
	2.2D Overweight permit on trailer? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> <b>Note: Evidence of valid overweight permits need to be provided by the carrier</b>		
	2.2E Is the trailer dedicated for the material to be transferred? Yes <input type="checkbox"/> No <input type="checkbox"/> (if yes, skip to section 2.2I)		
	2.2F Copy of wash ticket obtained? Yes <input type="checkbox"/> No <input type="checkbox"/>		2.2G Does wash meet shipper's requirements? Yes <input type="checkbox"/> No <input type="checkbox"/>
	2.2H Is the product that the trailer last contained compatible with scheduled transfer? Yes <input type="checkbox"/> No <input type="checkbox"/>		
T e r m i n a l  O u t b o u n d s	2.2I If load a Hazmat, is the trailer placarded? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>		2.2J If no, has terminal provided placards? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
	2.2K If seals are required, have they been issued? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>		
	2.2L Have product tags been issued for the specified product scheduled to be transferred? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>		
	2.2M If this is a preload and there is not a driver and/or a carrier power unit on site, has a terminal representative completed the carrier information section? Yes <input type="checkbox"/> No <input type="checkbox"/>		
	Terminal Rep: (Printed) <b>Michael Adelson</b> Date: <b>4/7/22</b>		
	Terminal Rep Signature: <i>[Signature]</i>		



# Standard Pre-Post Load Checklist

## Form Y-1160

### Yard Personnel

Form Y-1160 - C

Audit Number: 138058

TRANSFER QUESTIONS - AFTER SETUP	N/A		NO		YES	
	1st RC	2nd RC	1st RC	2nd RC	1st RC	2nd RC
<b><u>SAFETY</u></b>						
Railcar chocked and handbrake set?					X	
Proper PPE for the transfer?					X	
Pre-transfer conversation with Driver, if present?					X	
Truck turned "off" if not assisting with transfer?					X	
Loading side of the truck chocked?					X	
Window Safety Sign placed in the Driver's window?					X	
Grounding clamps and cables in good condition and properly connected?	X					
Safety Shower & Eye Wash Station tested for operation?					X	
If flammable transfer, non-sparking tools and safety cones?	X					
<b><u>QUALITY</u></b>	1st RC	2nd RC	1st RC	2nd RC	1st RC	2nd RC
Transfer Equipment: Proper transfer equipment? (Dedicated to product?)					X	
Transfer Equipment: Daily Checklist complete?					X	
Transfer Equipment: Proper hose(s), filters, etc.?					X	
Truck to Rail: (Inbound) Internal Heater Coils? - If first Load - Caps off?	X					
Inbound Liquid First Transfer: Is Bell Cap Removed/Test Valve Placed?					X	
Railcar's dome gasket is in serviceable condition? (When in doubt, change it out)					X	
Product hoses visually inspected per Work Instruction?					X	
Vapor and/or air hoses visually inspected per Work Instruction?					X	
<b><u>EFFICIENCY</u></b>	1st RC	2nd RC	1st RC	2nd RC	1st RC	2nd RC
Containment devices in place? Are catch pans placed under drain tubes on the trailer; also hose connections to the trailer and railcar?					X	
Product hose properly secured to the railcar - cam locks properly secured?					X	
Sufficient neutralizing and diking material available?						
Plastics: Dome lid and pneumatic outlet covered with clean filters?	X					
Railcar and Trailer properly vented?					X	
I have been trained and tested on this load and its applicable work instruction. Any variances related to this specific load have been identified and corrected. Signature: <i>[Signature]</i> 4-7-22						
<b>TRANSFER COMPLETION SECTION</b>	<b><u>HONESTY</u></b>		<b>SIGN AFTER LOAD IS COMPLETE</b>			
Tools, fittings, rags, absorbent pads, hoses, radios, PPE accounted for? Signature: <i>[Signature]</i>						

**Attachment 2**  
**Training Records**



24	Y/O-1234 Air Pollution Compliance-RM – YO-1103	
24	Y/O-1235 Used Oil 35 Day/HazWaste 10 Day RM-YO-1103	
24	Y/O-1236 Spill Prevention Control/Counter – RM YO-1103	
24	Y/O-1238 Universal Waste-Independ /TFs OP-104 –YO-1103	
	Y-1239 Hot Work Permits – RM – YO-1103	
24	Y/O-1240 Bloodborne Pathogens- RM – YO-1103	
24	Y/O-1247 Medical Surveillance- RM & Exam	
24	Y/O-1248 Understanding Chemical Hazards-RM/Exam	
4	<b>Fourth Quarter / October, November, December</b>	Date
	Y/O-1250 Compressed Gases/Pressure Vessels – RM/Exam	
	O-1253 Customer Service - Communicating – RM-YO-1103	
	Annual Observations & 112 Mobile Equipment Program	
	Week of Oct 21st MOCK DRILL training from Corporate	
	Y/O-1242 Railcar Calibration Charts Training – RM/YO-1103	
	Y/O-1243 Trailer Calibration Charts Training – RM/YO-1103	
	Y/O-1252 Non-Conforming Product – RM – YO-1103	
	<b>Lift Truck Training</b> Y-1254 w/PP and Exams in SharePoint	
	<b>Lift Truck Training</b> PP and Exams not required if using an	
	Outside Contractor for training. <b>Trainer has to be qualified.</b>	
	Finalize yearly training	
	Set up next year's training - month of December	
	YO-1216 DOT SP-14532 & YO-1217 DOT SP-13219 - PP for H202 product	
	TF Group - Use OP-104 Waste Mgmt & PP-HSE40 Waste Mgmt in January	
	Proper Verification - 2 X a Year (TM choice for dates WI Wed - 700's)	



Safety / Quality Training (Office and Yard Employees as applicable)												
Ident Reporting / Accidents:												
Out / Tag-Out		26-Mar				23-Feb	26-Mar			20-Feb	15-Nov	14-Nov
ing Conservation Awaren		26-Mar			23-Feb	26-Mar	26-Mar			5-Jan	15-Nov	14-Nov
rotection-Harness		26-Mar			23-Feb	26-Mar				15-Jan	15-Nov	14-Nov
e-Point/Ladder Safety					23-Feb					15-Jan	15-Nov	15-Nov
ent Back Injuries		26-Mar				26-Mar				20-Feb	15-Nov	15-Nov
ed Space Entry/		26-Mar								15-Jan	15-Nov	15-Nov
Power Tools						26-Mar				20-Feb	15-Nov	15-Nov
atory Protection Program		26-Mar				26-Mar				15-Jan	15-Nov	15-Nov
Electrical Safety										20-Feb	15-Nov	15-Nov
Water Best Practice										20-Feb	15-Nov	15-Nov
olution Best Practice										20-Feb	15-Nov	15-Nov
Used Oil -10-HazWaste										20-Feb	15-Nov	15-Nov
RM and Plan										20-Feb	15-Nov	15-Nov
Quarter												
Quarter												
il Waste												
Permits										20-Feb	15-Nov	15-Nov
Time Pathogens						26-Mar				20-Feb	15-Nov	15-Nov
Surveillance						26-Mar				15-Jan	15-Nov	15-Nov
nding Chemical Hazard						26-Mar				15-Jan	15-Nov	15-Nov
Used Gases/Pressure						26-Mar				15-Jan	15-Nov	15-Nov
Service-Communicate										20-Feb	15-Nov	15-Nov
Time	Micheline	Chris	Robert	Don	Travis	Katie	Neville	Luthy	Mike	Chris	Anthony	
Equipment									20-Feb	15-Nov	14-Nov	
ibration									20-Feb			
ibration									20-Feb			

Representation of Training

Revision Date: 10/30/20  
Revision Number: 20



**Attachment 3**  
**Parts Washer Service Receipts**

**Safety - Kleen Systems, Inc.**

42 Longwater Drive

Norwell, MA 02061

CORPORATE: 800 - 669 - 5740

24 HR EMERGENCY: 800 - 468 - 1760 (Safety - Kleen)

5617361339

## REFERENCE NBR.

93503076 - 2306840605

CUSTOMER# CS10118 CSX Transflow

890 Sw 21st Ave

Fort Lauderdale FL 33312 - 2226

PHONE 954 - 584 - 3111

SRVC WEEK:

SRVC DATE:

## BILL TO CUSTOMER#

CS10118

## BILL TO ADDRESS:

CSX Transflow

890 Sw 21st Ave

Fort Lauderdale FL 33312 - 2226

PHONE 954 - 584 - 3111

## PURCHASE ORDER#

## TAX EXEMPT#

## PRODUCT/SERVICES

SERVICES/ PRODUCT		QTY	UNIT PRICE	TAX	TOTAL CHARGE
51150	MDL 51 W/PRM SOLVENT	1.0	147.00	10.29	157.29
	\$/N 12345 TAG		CLEAN 8.0	\$PENT 7.0	
	SERVICE TERM 12 WEEK				
100030	RECOVERY FEE	1.0	20.00	1.40	21.40
100005	CHEMISTRY FEE	1.0	0.00	0.00	0.00

## TOTAL SERVICE/PRODUCTS

167.00 11.69 178.69

TOTAL CHARGE 178.69

CREDITS 0.00

TOTAL DUE 178.69

UNPAID BALANCE THIS RECEIPT 178.69

Spent solvent meets acceptance criteria?	Yes
Local Phone No. Sticker Affixed to Machine	Yes
Machine properly grounded?	No
Emergency closing of lid unobstructed?	Yes
Fusible link installed?	Yes
Decals in place and legible?	Yes
Lamp Assembly Condition	Yes
Machine clean and good condition?	Yes

DRAFT COPY

**Attachment 4**  
**Lead Acid Battery Exchange Receipt**



STORE

700004199  
M and H AUTOMOTIVE INC.  
3560 W. BROWARD BLVD  
FT. LAUDERDALE, FL 33312  
(954) 587-0300

Time: 11:06

Invoice Number 911973

Date: 10/24/2022



Page: 1/1

SOLD TO

2141  
CSX Transflo  
890 S W 21st Avenue  
Ft. Lauderdale, FL 33312

Employee: 16 , Gerald  
Sales Rep: 91 , Preferred  
Accounting Day: 24

Y  
OCR  
7000041999119737  
Y

Part Number	Line	Description	Quantity	Price	Net	Total	
8144	BAT	3MO WTY BAT ( )	2.00	256.27	146.0700	292.14	T
501	ENV	Battery Disposal Fee ( )	2.00	1.50	1.5000	3.00	DE
8144	BAT	Core Deposit ( )	2.00	27.00	27.0000	54.00	TD
8144	BAT	Core Deposit ( )	-2.00	27.00	27.0000	54.00	C TD

Anticipated Time: Our Truck - 4-10/24/2022 12:40 PM  
Attention:  
Tax Exemption:  
PO#: 2141  
Terms: 2%10NT25

TAXTABLE 4 7.0000% 20.45

Total 315.59

Charge Sale 315.59

Customer Signature

ALL GOODS RETURNED MUST BE ACCOMPANIED BY THIS INVOICE

**Attachment 5**  
**Phosgene Pesticide Waste Determination**



**DEGESCH**  
America, Inc.

## **MATERIAL SAFETY DATA SHEET: SPENT DEGESCH ALUMINUM PHOSPHIDE PRODUCTS**

Phostoxin® Tablets  
Phostoxin® Pellets  
Fumitoxin® Tablets  
Fumitoxin® Pellets

**From:**

Phostoxin® Tablet Prepac  
Phostoxin® Tablet Prepac Rope  
DetiaPhos® Tablets  
DetiaPhos® Pellets

### **SECTION I - PRODUCT INFORMATION**

**Manufacturer:**

DEGESCH America, Inc.  
153 Triangle Dr.  
P. O. Box 116  
Weyers Cave, VA 24486 USA

Telephone: (540) 234-9281/1-800-330-2525  
Telefax: (540) 234-8225  
Internet Address: [www.degeschamerica.com](http://www.degeschamerica.com)  
E-mail: [degesch@degeschamerica.com](mailto:degesch@degeschamerica.com)

**EMERGENCY TELEPHONE NOS.:**

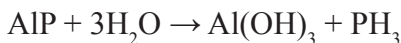
Human or Animal Emergencies: 1-800-308-4856  
All other chemical emergencies: 1-800-424-9300 - CHEMTREC  
Emergency and Information - DEGESCH America, Inc. (540) 234-9281 or 1-800-330-2525

Date of Revision: March 2015

### **SECTION II - HAZARDOUS INGREDIENTS INFORMATION**

**Identity:**

Waste, spent Degesch aluminum phosphide products consist mainly of aluminum hydroxide and inert ingredients in the formulation of the product. The aluminum hydroxide is generated via the following reaction:



$\text{Al}(\text{OH})_3$	CAS No. 21645-51-2
AlP	CAS No. 20859-73-8
$\text{PH}_3$	CAS No. 7803-51-2

The spent material will also contain from about 2 to 3 percent unreacted aluminum phosphide. However, this small amount of active ingredient is stabilized in the crystalline lattice of the waste. As a result, the waste has very low oral and dermal toxicity, is not a significant fire hazard and is not a RCRA hazardous waste. Spent and partially spent dust are rather dense and ordinarily do not represent an inhalation hazard. Proper protective equipment should be worn under conditions where significant risks of inhalation are present.

Unreacted or incompletely exposed aluminum phosphide fumigants are highly toxic and are hazardous wastes which will trigger the RCRA laboratory test characteristics of reactivity and ignitability. Since Degesch phosphine fumigants are not manufactured with ingredients listed under the RCRA toxicity characteristic, they will not trigger the toxicity characteristic leaching procedure (TCLP).

**ACGIH Exposure Limits:**

Phosphine: TLV/TWA 0.3 ppm PH<sub>3</sub>, TLV/STEL 1.0 ppm PH<sub>3</sub>  
Aluminum Oxide Dust: TLV/TWA 10mg/m<sup>3</sup>

**Toxicity:**

Acute Oral Toxicity LD<sub>50</sub> = 3000 mg/kg  
Acute Dermal Toxicity LD<sub>50</sub> > 5000 mg/kg

**NFPA Chemical Hazard Ratings:**

Flammability Hazard 1  
Health Hazard 0  
Reactivity Hazard 1  
Special Hazard None

**SARA Physical and Health Hazards:**

None

**SECTION III - PHYSICAL CHARACTERISTICS OF ALUMINUM PHOSPHIDE**

**Boiling Point:** >1000°C

**Vapor Pressure:** 0mm Hg @25°C

**Density:** 2.4g/cc

**Solubility in Water:** insoluble

**Solubility in Acid and Base:** very soluble and will liberate small amounts of phosphine

**Appearance and Odor:**

Spent Degesch aluminum phosphide products are a slight grayish-white in color. They are generally odorless, however, they may have a faint garlic or decaying fish odor due to traces of phosphine being evolved.

**SECTION IV - FIRE AND EXPLOSION HAZARD DATA**

**Flash Point:** >800°C

**Extinguishing Media:** n/a, not flammable

**Special Fire Fighting Procedures:** n/a

**Respiratory Protection:**

None required. Use NIOSH/MSHA approved dust mask if spent dust becomes airborne.

**Protective Clothing:**

Wear gloves when handling aluminum phosphide or its spent dust

**Unusual Fire and Explosion Hazards:**

None, under ordinary circumstances. However, spent dust will liberate small amounts of phosphine when reacted with acids or bases. The phosphine, if it is allowed to concentrate in a confined area, may be toxic and/or flammable.

**SECTION V - REACTIVITY DATA****Stability:**

Spent aluminum phosphide dusts are stable under most conditions. However, the dust will liberate phosphine if contacted by acids, bases or boiling water.

**Incompatibility:**

None, except as described under Stability.

**Corrosion:**

None.

**HAZARDOUS POLYMERIZATION:**

Will not occur.

## **SECTION VI - HEALTH HAZARD INFORMATION**

### **Routes of Entry:**

The primary route of exposure is dermal. However, ingestion and inhalation exposures are also possible. Spent dust from Degesch aluminum phosphide products has very low oral and dermal toxicity. This small risk may be avoided by the use of cloth gloves when handling the material, as required by EPA-approved labeling. Accidental ingestion is avoided by washing, prior to eating, after handling phosphine fumigants. The risk of any significant inhalation is very small because of the high density of the spent dust and its low toxicity.

### **Acute and Chronic Health Hazards:**

Exposure to phosphine at levels up to worker protection limits will not cause any acute effects or carcinogenicity or other chronic health effects. Spent dust has very low acute toxicity via the dermal or oral exposure routes and it is believed to have no chronic toxicity.

### **Carcinogenicity:**

Phostoxin and Fumex are not carcinogenic and aluminum phosphide and other ingredients of spent dust from Degesch fumigants are not known to be carcinogenic.

### **Signs and Symptoms of Exposure:**

There are no signs or symptoms of exposure to spent dust at levels likely to be encountered.

### **Emergency and First Aid Procedures:**

Usually no emergency or first aid procedures are required due to the low toxicity of the spent dust. However, recommended procedures for dealing with overexposures from unreacted aluminum phosphide and phosphine are given below.

#### **If the gas or dust from aluminum phosphide is inhaled:**

Move person to fresh air. If person is not breathing, call 911 or an ambulance, then give artificial respiration, preferably by mouth-to-mouth, if possible. Call a poison control center or doctor for further treatment advice.

#### **If aluminum phosphide pellets, tablets or powder are swallowed:**

Call a poison control center or doctor immediately for treatment advice. Have person sip a glass of water if able to swallow. Do not induce vomiting unless told to by a poison control center or doctor. Do not give anything by mouth to an unconscious person.

#### **If powder or granules of aluminum phosphide get on skin or clothing:**

Take off contaminated clothing. Rinse skin immediately with plenty of water for 15-20 minutes. Call a poison control center or doctor for treatment advice. Brush or shake material off clothes in a well-ventilated area. Allow clothes to aerate in a ventilated area prior to laundering. Do not leave contaminated clothing in occupied and/or confined areas such as automobiles, vans, motel rooms, etc.

#### **If dust from pellets or tablets gets in eyes:**

Hold eye open and rinse slowly and gently with water for 15-20 minutes. Remove contact lenses if present, after the first 5 minutes, then continue rinsing eye. Call a poison control center or doctor for further treatment advice.

## **SECTION VII - PRECAUTIONS FOR SAFE HANDLING**

Avoid contact with spent dust by using cloth gloves when handling this material. Avoid inhalation of the spent dust. NIOSH/MSHA approved dust masks should be worn if inhalation of the dust is likely to occur.



**For Assistance:**

Contact - DEGESCH America, Inc.  
Telephone: (540) 234-9281 or 1-800-330-2525  
Telefax: (540) 234-8225  
Internet address: [www.degeschamerica.com](http://www.degeschamerica.com)  
E-Mail: [degesch@degeschamerica.com](mailto:degesch@degeschamerica.com)

or

Human or Animal Emergencies: 1-800-308-4856  
All other chemical emergencies: 1-800-424-9300 - CHEMTREC

**Disposal of Spent Phostoxin:**

When being disposed of, spilled or partially reacted Degesch aluminum phosphide fumigants are hazardous wastes under existing Federal Regulations. If properly exposed, the grayish-white residual dust after a fumigation will not be a hazardous waste and normally contains only a very small amount of unreacted aluminum phosphide. This waste will be safe for disposal. However, the residual dust from incompletely exposed products may require special care.

Triple rinse flasks and stoppers with water or dry deactivate them by exposure to open air for 24 hours or longer. Then offer for recycling or reconditioning, or puncture and dispose of in a sanitary landfill, or by other procedures approved by state and local authorities. Rinsate may be disposed of in a storm sewer, sanitary landfill or by other approved procedures. Or, it is permissible to remove lids and expose empty flasks to atmospheric conditions until the residue in the flasks is reacted. Then puncture and dispose of in a sanitary landfill or other approved site, or by other procedures approved by state and local authorities.

Some local and state waste disposal regulations may vary from the above recommendations. Disposal procedures should be reviewed with appropriate authorities to ensure compliance with local regulations. Contact your State Pesticide or Environmental Control Agency or Hazardous Waste Specialist at the nearest EPA Regional Office for guidance.

See Degesch America, Inc. MSDS for Aluminum Phosphide fumigants for recommendations on disposal and handling unreacted or incompletely reacted fumigant.

**SECTION VIII - CONTROL MEASURES****Respiratory Protection:**

NIOSH/MSHA approved respiratory protection for dusts may be used when inhalation exposure to spent dust is likely to occur.

**Protective Clothing:**

Wear cloth gloves when handling spent dust from aluminum phosphide fumigants.

**Eye Protection:**

None required.

**We believe the statements, technical information and recommendations contained herein are reliable, but they are given without warranty or guarantee of any kind, expressed or implied, and we assume no responsibility for any loss, damage, or expense, direct or consequential, arising out of their use.**

**Attachment 6**  
**Notification of Regulated Waste Activity Submittal**

## Lisa Wiedemann

---

**From:** Moss, Erich <emoss@transflo.net>  
**Sent:** Tuesday, September 9, 2014 6:51 AM  
**To:** Ashwood, Janet; Lisa Wiedemann  
**Cc:** Rainey, Julie C.; Horlick, Susan  
**Subject:** RE: TRANSFLO Terminals

I'm sorry, I missed that last e-mail.

TRANSFLO provides a location and means (such as pumps or hoses) to facilitate the transfer of commodities, including used oil, from customer-owned trucks to customer owned/leased railcars (or railcar to truck). TRANSFLO does not transport used oil over public highways at any time.

I hope that clarifies TRANSFLO's operations. Please contact me if you need anything further.

*Erich Moss  
Manager HSE&Q  
**TRANSFLO Terminal Services, Inc.**  
500 Water Street, J975  
Jacksonville, FL 32202  
OFF: 904.359.2312  
CEL: 904.608.6970*

---

**From:** Ashwood, Janet [mailto:Janet.Ashwood@dep.state.fl.us]  
**Sent:** Monday, September 08, 2014 4:52 PM  
**To:** 'Lisa Wiedemann'  
**Cc:** Moss, Erich; Rainey, Julie C.; Horlick, Susan  
**Subject:** TRANSFLO Terminals

Hi Lisa,

Attached is the email response I needed from Eric. Once we receive it I do believe we are ready to issue the certificate. Let me know if you have any further questions.

*Thanks  
Janet*

**Janet Ashwood**  
**Hazardous Waste Program and Permitting, MS# 4560**

**Direct: 850.245.8789**

---

**From:** Lisa Wiedemann [mailto:lwiedemann@wiedemannllc.com]  
**Sent:** Monday, September 08, 2014 4:44 PM  
**To:** Ashwood, Janet  
**Subject:** TRANSFLO Terminals

Hi Janet,

Here's my contact information.

Regards,

Lisa Wiedemann  
Wiedemann & Associates, LLC  
619-303-1496 (office)  
904-228-8788 (cell)  
[lwiedemann@wiedemannllc.com](mailto:lwiedemann@wiedemannllc.com)



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**Lisa Wiedemann**

---

**From:** Ashwood, Janet <Janet.Ashwood@dep.state.fl.us>  
**Sent:** Tuesday, April 22, 2014 2:22 PM  
**To:** 'Moss, Erich'  
**Cc:** Rainey, Julie C.  
**Subject:** TRANSFLO - FL Sites - Insurance

Eric,

Just one more thing, I need an email from you to document that your operation is by rail only and that you are not transporting over public highways more than 500 gallons of used oil annually, or 55 gallons or more of used oil, at any time, pursuant to subsection 62-710.600(1), F.A.C., therefore, you are not required to certify (provide evidence of liability insurance) as a transporter for the Ft. Lauderdale and Sanford sites.

Let me know if you have any further questions.

*Thanks  
Janet*

**Janet Ashwood**  
**Hazardous Waste Program and Permitting, MS# 4560**

**Direct: 850.245.8789**

---

**From:** Moss, Erich [mailto:[emoss@transflo.net](mailto:emoss@transflo.net)]  
**Sent:** Wednesday, April 02, 2014 9:05 AM  
**To:** Ashwood, Janet  
**Subject:** TRANSFLO - FL Sites - Insurance

I am sorry I hadn't gotten back to you but I am still waiting for a response from our Insurance Group to my question regarding coverage.

I will contact them again today and let you know.

I apologize for the delay.

*Erich Moss  
Manager HSE&Q  
TRANSFLO Terminal Services, Inc.  
500 Water Street, J975  
Jacksonville, FL 32202  
OFF: 904.359.2312  
CEL: 904.608.6970*

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**Attachment 7**  
**Used Oil Transfer Facility Registration Photo Documentation**



## FLORIDA DEPARTMENT OF Environmental Protection

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

March 13, 2024

Ron DeSantis  
Governor

Jeanette Nuñez  
Lt. Governor

Shawn Hamilton  
Secretary

Ryan Prewitt  
Ft Lauderdale Transflo Terminal  
500 Water St #J975  
Jacksonville, FL 32202-4423

### BE IT KNOWN THAT

Ft Lauderdale Transflo Terminal  
890 SW 21st Ave  
Ft Lauderdale, FL 33312-2226

### IS HEREBY REGISTERED AS A USED OIL

Transporter, Transfer Facility

pursuant to Chapter 62-710, Florida Administrative Code (F.A.C.)  
For regulatory guidance, go to:  
[http://www.dep.state.fl.us/waste/categories/used\\_oil/default.htm](http://www.dep.state.fl.us/waste/categories/used_oil/default.htm)  
The Department of Environmental Protection hereby issues  
Registration Number **FLD984253542** on March 13, 2024

**This registration will expire on 6/30/2025**

This certificate documents receipt of your annual registration  
and annual report. It shall be displayed in a prominent place  
at your facility. This certificate and your cancelled check  
are your receipts.

A handwritten signature in cursive script, reading "Janet K. Ashwood".

Janet Ashwood  
Environmental Consultant  
Waste Compliance Assistance Program