

## Memorandum

# Florida Department of Environmental Protection

TO: North Florida Oil, Inc.  
Used Oil Processing Permit Application  
Permit File - HO06-0027221

FROM: Mary McGehee  
Engineer  
Hazardous Waste Section

DATE: September 16, 1997

RE: Permit Application Meeting

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The purpose of this memo is to record my notes taken during a permit processing meeting conducted at the North Florida Oil facility in Astor, Florida. The meeting participants included Mr. Bob Simmons (NFO), Mr. Rod Vargus (Apex) and myself. The notes follow the order in which topics were discussed during the meeting.

- Bob Simmons explained NFO is investigating the possibility of installing a truck wash at this location. He would like to use the accumulated rainwater that collects in the secondary containment units of his customers for the truck washwater. NFO disposes of this containment water as Petroleum Contact Water (PCW). NFO has a 15,000 gallon storage tank on site which is divided into two 7,500 gallon compartments. One compartment would contain the PCW washwater and the other would contain the re-used PCW/detergent dirty truckwash water. The PCW washwater will be disposed of as PCW to their industrial wastewater disposal facility (IWS - Jacksonville).
- They are planning to add an apron (approximately 60 ft. deep and 75-100 ft. wide) on the East side of the present tank farm.
- They are planning to construct a building on the East side of the proposed new East apron. Dimensions of this new building would be 60 ft. by 100 ft.
- Inside the proposed new building there will be 8 inches of containment curb with ramped doors. It will contain no floor drains unless they decide to put bathroom facilities inside this building. If they do, the bathroom will be connected to a septic system.
- The proposed new building will be for drum storage and house the filter press machine. Truck maintenance will also be conducted in this location.
- The truckwash facility would be located behind the proposed new building. Bob said he had conceptually discussed the issue with Lu Burson, however, I do not believe the details regarding PCW were addressed. There will be a containment curb with roll-over berms for trucks to enter and leave. Inside this truckwash, there will be a low area with a concrete sump in the corner. There will be a sump pump in the corner to pump the PCW washwater back into the compartmentalized 15,000 gallon storage tank which will be located adjacent to the side wall of the truckwash.

- QUESTION: Can NFO re-use the PCW water to wash trucks? I explained to Bob Simmons I did not think he would be allowed to use the PCW water as truckwash water and the issue should be addressed further before he goes to the expense of converting the tank over.
- QUESTION: Need to check with the Industrial Waste Section to see if a permit is necessary to operate a truckwash. Rod Vargus is familiar with this and will advise NFO.
- NFO is proposing to place a 40,000 gallon storage tank horizontally along the West side of the tank farm. Presently there is a concrete apron and this area is identified in their permit application as the "Offloading" area.
- The proposed changes will not take affect for another 6 months to one year. During the meeting it was agreed upon that FDEP will continue processing the application that has been submitted for the Used Oil Processor. Changes will come with modifications.
- Bob Simmons was wondering what could be done, or what would trigger a modification to the application/permit. I stated they didn't need to modify the application in order to pour the concrete apron, building foundation, and erect the building. However, when the facility layout plans are complete they must submit a final facility layout plan addressing the construction changes for the application.
- Discussed the antifreeze concerns with their Non-Hazardous Waste Manifest. The Paperwork from NFO identifies the antifreeze is destined for recycling. In the permit application NFO had stated the antifreeze is disposed of as an industrial waste. Bob stated they were planning to send the waste antifreeze they pick up from their customers to Florida Packaging in Miami, however they are not doing that yet. I gave Bob Simmons a copy of the August 6, 1996 - *Interim Guidance on the Management of Antifreeze Destined for Recycling*. A copy will also be sent to Rod Vargus for his information.
- Filter material (paper) is sent to the Ogden Martin incinerator.
- Analysis from Precision Petroleum Lab was given to me for the used oil (product).
- NFO also provided profiling analysis for soil destined for treatment by CI Meyers (soil-burner) which had accumulated due to small spills or drips around the facility.
- Sludge Testing - there are two sludge wastestreams. 1) Sludge from the filter press machine characterizes this wastestream as non-hazardous and was provided to me during the meeting. This sludge was sampled by Perma-Fix Environmental Services in Gainesville. NFO generates approximately one (1) 55-gallon drum of filter press sludge each month. NFO has been accumulating this material in drums, they have never had to dispose of it yet. Although they have been processing filters for approximately one year they have only 4 55-gallon drums of filter press sludge, this is due to only processing the filters once a week or having a slow production time. NFO plans on sending this material to Ogden Martin for disposal. 2) The other sludge wastestream is from the storage tanks. Bob indicated the storage tanks have never had the sludge emptied from the bottom of them. This confused me since in the permit application it explains the sludge will be emptied from the storage tanks approximately once a year. On one occasion, a tank has been removed from service and the sludge removed at that time. There was no documentation at the facility which demonstrated how this sludge was characterized. Brownie's Environmental vacuumed the tanks and disposed of the sludge through Gordon Kirkland, Florida Environmental Compliance Corporation. Bob Simmons tried to contact Gordon Kirkland to obtain sample results. At the time this tank was being taken out

of service, Brownie pulled the sample and indicated the sludge was non-hazardous. I STRONGLY suggested NFO maintain copies of all analytical sampling done at this facility. Brownie has since gone out of business. Rod Vargus will contact Gordon Kirkland and submit copies of the tank sludge to the Department.

- I told Bob Simmons I would finalize my notes for the file. He asked to have all copies of correspondence sent to Gordon Kirkland and Rod Vargus as well.
- Oil Water Separator - we walked outside the office to see the tank Bob Simmons is proposing to develop into an oil water separator. The purpose of this oil water separator is to help contend with the rainwater accumulating in the tank farm secondary containment. The proposed 16,000 gallon tank has 5 separate compartments. He is proposing to cut the tank horizontally in half and drilling holes in each bulk head which will let the water seep from the most oily accumulation water into the next bulk head gradually skimming off the oil top surface. There will be a 24 hour continuous pump. After the accumulated containment rainwater goes through the five compartments of the oil water separator it will be discharged back into the tank farm secondary containment unit.
- On this day, the tank farm secondary containment unit contained approximately 8 inches of rainwater with a layer of oil on top.
- Behind the tank farm there is a diesel product tank. I would estimate the tank to be between 750-1000 gallons and asked if it was registered. Bob said he thought Brenda (Simmons) had registered it but was not sure.
- The secondary containment unit for the industrial burner was completely full (I would estimate approximately 200 gallons) of burner oil. The pump to this unit blew a seal. Bob Simmons intends on pumping this oil into the tank farm secondary containment unit and running this through the oil/water separator. Bob stated he may be able to have the oil/water separator up and running by the end of this week.
- Sludge from the filter box goes into the dumpster and is sent to Ogden Martin. NFO cleans the filter bags around 4 times a week, this operation generates approximately 5 gallons of sludge per week. This waste stream has never been tested. Suggested they sample, characterize, and profile the waste as necessary.
- The tank farm secondary containment wall has been here approximately 16 years. Each concrete block cell is filled with rebar and concrete.
- On a separate issue, NFO is in the process of converting a mobile home air-conditioning system to provide cool/fresh ventilation for tank cleaning operations. Presently the drivers climb inside the truck tanks to pressure wash residual sludges. Discussed the possibility that this may be confined space and suggested they check with OSHA for clarification. It is my understanding that Rod Vargus will check on this practice for them.

cc: Bob Simmons, NFO  
Gordon Kirkland, FECC  
Rod Vargus, Apex Engineering