



Division of Waste Management and Radiation Control
USED OIL TRANSFER FACILITY PERMIT



Permittee: **Simons Petroleum, LLC dba Pilot Thomas Logistics**

Permittee Mailing Address: 201 North Rupert Street
Fort Worth, TX 76107

Permittee Phone Number: (817) 877-8348

Permittee Contact: Bryan Christian, Environmental Compliance Mgr.
Pilot Thomas Logistics, Environmental Dept.
621 North Morgan Rd
Oklahoma City, OK 73127
(304) 550-1725 office
Email: bryan.christian@pilotthomas.com

Permittee Transfer Facility Address: 1157 East 135 South
Vernal, UT 84078

Facility Contact: Darren Anderson, Driver
(435) 823-7560 cell
Email: darren.anderson@pilotthomas.com

Type of Permit: **Used Oil Transfer Facility Permit**

Permit #: **UOP-0075**

EPA ID #: UTR000005124

Original Date of Issuance: September 16, 1999

Signature: _____ Date: _____
Scott T. Anderson, Director
Division of Waste Management and Radiation Control

I.A. Effect of Permit

- I.A.1. Simons Petroleum, LLC dba Pilot Thomas Logistics (hereafter referred to as “the Permittee”) is hereby authorized to operate a Used Oil Transfer Facility located at 1157 East 135 South, Vernal, UT, in accordance with all applicable requirements of R315-15 of the Utah Administrative Code and the Used Oil Management Act (the Act) 19-6-701 et. seq., Utah Code Annotated and this permit.
- I.A.2. This Permit shall be effective for a term not to exceed ten years in accordance with the requirements of R315-15-15 of the Utah Administrative Code.
- I.A.3. Attachments incorporated by reference are enforceable conditions of this permit, as are documents incorporated by reference into the attachments. Language in this permit supersedes any conflicting language in the attachments or documents incorporated into the attachments.

I.B. Permit Revocation

- I.B.1. Violation of any permit condition or failure to comply with any provision of the applicable statutes and rules shall be grounds for enforcement actions, including revocation of this Permit. The Director shall notify the Permittee in writing of his intent to revoke this Permit.

I.C. Permit Modification

- I.C.1. The Permittee may request modifications to any item or activity covered by this Permit by submitting a written permit modification request to the Director. If the Director determines the modification request is substantive, a public hearing, a 15-day public comment period, or both may be required before a decision by the Director on the modification request. Implementing a substantive modification prior to the Director’s written approval constitutes a violation of the Permit and may be grounds for enforcement action or permit revocation.
- I.C.2. The Director may modify this Permit as necessary to protect human health and the environment, because of statutory or regulatory changes or because of operational changes affecting this Permit.
- I.C.3. The Permittee shall notify the Director, in writing, of any non-substantive changes, such as changes in the contact person, within 20 days of the change.

I.D. Spill Prevention, Emergency Controls and Maintenance

- I.D.1. The Permittee shall maintain and operate the transfer facility, including all used oil transportation vehicles, storage units, containers, tanks, and associated equipment to minimize the possibility of fire, explosion, or sudden or non-sudden release of used oil to air, ground, soil, surface and groundwater and sewer systems.

- I.D.2 The Permittee shall inspect and maintain used oil equipment, tanks, containers and storage units on a weekly basis to ensure compliance with this section.
- I.D.3 In the event of a release of used oil, the Permittee shall comply with the Emergency Controls and reporting requirements specified in R315-15-9 Utah Administrative Code and the Permittee's Spill Plan Attachment 3.
- I.D.4. It shall not constitute a defense for the Permittee in an enforcement action that it would have been necessary to halt or reduce the Permittee business activity in order to maintain compliance with the conditions of this permit and attachments.
- I.D.5. The Permittee is subject to all applicable Spill Prevention, Control and Countermeasures (SPCC) as defined in 40 CFR 112 and shall maintain an SPCC Plan for this site.

I.E. Record Retention

- I.E.1. The Permittee shall maintain all applicable used oil records required by R315-15 of the Utah Administrative Code and this Permit at the Permittee's offices located at 621 North Morgan Road, Oklahoma City, OK 73127. Tank loading records shall be kept at the Vernal facility until the oil is picked up by a transporter, whereupon a copy of the records shall also be transferred to the Oklahoma office.
- I.E.2. All records shall be readily accessible for inspection by representatives of the Director. Records may be in a hard copy or electronic format. The Permittee shall maintain records for a minimum of three years.

I.F. Tracking

- I.F.1. The Permittee shall keep documentation of each used oil load received, transferred and delivered to verify storage periods. The records shall be kept at the transfer facility.
- I.F.2. The Permittee's facility acceptance records shall document the permitted transporter's name, address, EPA identification number, the name of the receiving entities, date of acceptance and signature of the transporter.
- I.F.3. The Permittee's facility shipping records shall document the transfer of the used oil to a permitted used oil transporter, transfer facility, burner or processor. This record shall have the company name, address and EPA identification number of the entity receiving the used oil. Both the Permittee and the receiving entity (dated upon receipt) shall sign the shipping record.

I.G. Sampling and Analyses

I.G.1. The Permittee shall follow all sampling and analytical procedures in Condition II.D and Attachment 2 when conducting used oil sampling and analytical testing to meet the requirements of R315-15 of the Utah Administrative Code and this Permit.

I.H. Prohibited Waste

I.H.1. Used oil that has been mixed with hazardous waste as defined by R315-261 of the Utah Administrative Code or PCBs as defined by R315-301-2(53) of the Utah Administrative Code shall no longer be managed as used oil and shall be subject to applicable hazardous waste and PCB-contaminated waste rules.

I.H.2. Used oil shall not be stored in tanks, containers or storage units that previously stored hazardous waste unless these tanks, containers, storage units and associated piping are cleaned in accordance with R315-261-7 of the Utah Administrative Code.

I.H.3. The Permittee shall not place, manage, discard or otherwise dispose of used oil in any manner specified in R315-15-1.3 of the Utah Administrative Code.

I.I. Waste Characterization and Disposal

I.I.1. The Permittee shall properly characterize used oil waste related material to determine if the wastes are hazardous or non-hazardous in accordance with R315-15-8 of the Utah Administrative Code and manage accordingly.

I.I.2. The Permittee shall maintain records showing characterization, handling and disposal of waste generated at the facility.

I.J. Used Oil Storage

I.J.1. The Permittee shall not store used oil longer than 35 days without first obtaining a processor permit for that storage location. This includes storing used oil in vehicles at loading and unloading docks and parking areas.

I.J.2. The Permittee shall have secondary containment for all storage units, containers, tanks, transportation vehicles and associated piping in accordance with R315-15-4.6 of the Utah Administrative Code.

I.J.3. The Permittee shall not store used oil in units other than tanks, containers or units subject to regulations under R315-265 or R315-264 of the Utah Administrative Code.

I.J.4. The Permittee shall label all used oil containers, tanks and, when applicable, associated piping with the words "Used Oil."

I.K. Liability and Financial Requirements

I.K.1. The Permittee shall be financially responsible for cleanup and closure costs, general liabilities and environmental pollution legal liability for bodily or property damage to third parties resulting from the release of use oil in accordance with R315-15-10 through 12 of the Utah Administrative Code and this Permit.

- I.K.2. The Permittee shall provide documentation of financial responsibility for cleanup and closure, environmental pollution legal liability and general liability coverage annually to the Director for review and approval by March 1 of each reporting year with the Annual Report or upon request by the Director.
- I.K.3. The Permittee shall receive written approval from the Director for any changes in the extent, type (e.g., mechanism, insurance carrier or financial institution) or amount of the environmental pollution legal liability or financial assurance mechanism for coverage of physical or operational conditions at the facility that change the nature and extent of cleanup and closure costs. The Permittee shall receive approval from the Director prior to implementation of these changes.
- I.L. Cleanup and Closure Plan**
- I.L.1. The Permittee shall update its closure plan cost estimates and provide the update estimated to the Director, in writing, within 60 days following a facility modification that causes an increase in the financial responsibility required under R315-15-10 of the Utah Administrative Code. Within 30 days of the Director's written approval of a permit modification for the cleanup and closure plan that would result in an increase cost estimate, the owner or operator shall provide to the Director the information specified in R315-15-11.2(b)(2) of the Utah Administrative Code and Condition II.G of this Permit.
- I.L.2. The Permittee shall initiate closure of the facility within 90 days after the Permittee receives the final volume of used oil or after the Director revokes the Permittee's Transfer Facility Permit in accordance with the requirements of R315-15-11.3 of the Utah Administrative Code and this Permit.
- I.L.3. Within 60 days of completion of cleanup and closure, the Permittee shall submit to the Director, by registered mail, a certification that the facility has been closed in accordance with R315-15-11.4 of the Utah Administrative Code and the specifications of the approved cleanup and closure plan. An independent, Utah-registered professional engineer and the Permittee shall sign the closure certification.
- I.L.4. Additional sampling and remediation may be required by the Director to verify that cleanup and closure has been completed according to R315-15 of the Utah Administrative Code.
- I.M. Used Oil Handler Certificate**
- I.M.1. In accordance with R315-15-4 of the Utah Administrative Code, the Permittee shall not operate as a used oil transfer facility without obtaining annually a Used Oil Handler Certificate from the Director. The Permittee shall pay a used oil handler fee, pursuant to Utah Code 63J-1-504, by December 31 of each calendar year to receive certification for the upcoming calendar year.
- I.N. Inspection and Inspection Access**
- I.N.1. Any duly authorized employee of the Director may, at any reasonable time and upon presentation of credentials, have access to and the right to copy any records relating to

used oil and to inspect, audit or sample. The employee may also make record of the inspection by photographic, electronic, audio, video or any other reasonable means to determine compliance.

I.N.2. The authorized employees may collect soil, groundwater or surface water samples to evaluate the Permittee's compliance.

I.N.3. Failure to allow reasonable access to the property by an authorized employee may constitute "denial of access" and may be grounds for enforcement action or permit revocation.

I.O. Annual Report

I.O.1. The Permittee shall prepare and submit an Annual Report to the Director by March 1 of the previous year. The Annual Report shall describe the Permittee's used oil activities in Utah and document financial assurance using the Division's Used Oil Transfer Facility Annual Report form (UO 004) as required by R315-15-13.4 of the Utah Administrative Code.

I.P. Other Laws

I.P.1 Nothing in this Permit shall be construed to relieve the Permittee of his obligation to comply with any Federal, State or local law.

I.Q. Enforceability

I.Q.1. Violations documented through the enforcement process pursuant to Utah Code Annotated 19-6-112 may result in penalties in accordance with R315-102 of the Utah Administrative Code.

I.R. Effective Date

I.R.1. The permit is effective on the date of signature by the Director.

II.A. Used Oil Transfer Facility Operations

- II.A.1. The Permittee is authorized to store 4,500 gallons of used oil for up to 35 days in steel tanks, plastic totes and drums described in Condition II.B below.
- II.A.2. Storage in any other type of container is prohibited.
- II.A.3. The Permittee shall only accept shipments of used oil from Utah permitted used oil transporters.
- II.A.4. The Permittee shall verify, at the time of acceptance, that the transporter delivering the used oil has recorded the halogen content of the used oil on the shipping documents.
- II.A.5. If the transporter has not documented the halogen content on the shipping records, then the Permittee shall determine the halogen content of the shipment of used oil received at the facility at the time of acceptance as follows:
 - II.A.5.a. The Permittee shall determine the halogen content by collecting a representative sample in accordance with Condition II.D and Attachment 2 and screening the used oil sample for halogens or by submitting the sample to a Utah-certified laboratory for analysis in accordance with the analytical requirements of Attachment 2.
 - II.A.5.b. The Permittee shall then record the results of the halogen testing on the shipping document prior to shipment from the facility.
- II.A.6. The Permittee is not required to further test used oil from a Utah-registered used oil marketer if the marketer provides, at the time of acceptance, analytical data results documenting that the used oil has been tested for the parameters in R315-15-1.2 of the Utah Administrative Code.
- II.A.7. The Permittee may accept shipments of used oil from used oil transfer facilities, processors/re-refiners, and burners with valid EPA identification numbers in the form of bulk used oil or in totes or drums.
- II.A.8. The Permittee shall manage used oil recovered from oily water as used oil in accordance with R315-15 of the Utah Administrative Code and this Permit.
- II.A.9. The Permittee shall not accept or store used oil with PCB concentrations greater than or equal to 50 mg/kg (ppm) unless the Permittee complies with TSCA regulations 40 CFR 761. Used oils containing PCB concentrations greater than or equal to 2 mg/kg but less than 50 mg/kg are subject to both R315-15 of the Utah Administrative Code and 40 CFR 761.

II.B. Used Oil Storage Areas and Secondary Containment

- II.B.1. The Permittee shall only store used oil in drums, totes and steel tanks described in Table 1 and Condition II.B.2 below and as follows:

- II.B.1.a. Tank 1 is a rectangular, single-wall, above-ground, 5/16-inches thick, painted steel tank (AST). The tank has a capacity of 3,000 gallons and has no vent line or piping.
- II.B.1.b. The tank is located in a 16 feet by eight feet by three feet concrete vault capable of holding its entire contents, referenced by the Permittee as the “pit.”

Table 1 -- Facility Tanks

Tank Designation & Location	Capacity (gallons)	Tank Use
Tank 1 Warehouse	3,000	Used oil from generator pickups and/or permitted transporters.

- II.B.2. In addition to the tank listed in Table 1, the Permittee may store up to 6,600 gallons of used oil in totes and drums located in the concrete containment at the rear (northeast) corner of the warehouse.

II.C. Used Oil Loading and Unloading Requirements

- II.C.1. The Permittee shall secure the vehicle by positioning wheel chocks and applying the emergency brakes before loading or unloading used oil from transportation vehicles.
- II.C.2. The Permittee shall inspect all used oil collection equipment (e.g., vehicles, tanks and associated pumping equipment) for any damage prior to use.
- II.C.3. The Permittee shall place buckets or other containers under piping connections to collect drips of used oil during loading and unloading operations.
- II.C.4. The Permittee shall ensure the amount of used oil to be loaded will not exceed the current capacity. The Permittee shall utilize a calibrated gauging instrument.
- II.C.5. The Permittee is not authorized to transfer used oil between highway vehicles and railcars or railcars to railcars at this facility unless this Permit is modified with the information required by R315-15-13.4(a)(16) of the Utah Administrative Code.
- II.C.6. During loading and unloading operations, a trained operator shall remain at the transfer location and maintain control of the operations throughout the entire used oil transfer. The trained operator shall be an employee of the Permittee.

II.D. Used Oil Sampling and Analysis

- II.D.1. The Permittee shall sample and analyze used oil accepted at the facility when required by Condition II.A of this Permit in accordance with the requirements of Attachment 2 (Sampling and Analysis Plan).

II.E. Used Oil Training

- II.E.1. The Permittee shall train handlers of used oil in accordance with R315-15-4 of the Utah Administrative Code and the requirements of this Permit. New employees may not manage or process used oil without a trained employee present until used oil training is completed.
- II.E.2. Employee training shall include documentation that the following topics were covered: identification of used oil, recordkeeping requirements and facility used oil procedures for handling, transporting, sampling and analysis, emergency response, spill reporting and personal safety.
- II.E.3. The Permittee shall provide, at a minimum, an annual used oil-training refresher course for employees handling used oil. Additional training is required if the Permittee changes used oil handling procedures.
- II.E.4. The Permittee shall keep training records for each employee for a minimum of three years. Employees and supervisors shall sign and date training attendance sheets to document class attendance.
- II.E.5. Employees collecting and performing field halogen testing shall be trained and shall demonstrate competence in collecting a representative used oil sample and testing for halogens using a CLOR-D-TECT[®] kit prior to fieldwork.

II.F. Spill Response, Remediation, and Reporting

- II.F.1. In accordance with R315-15-9.1(a) of the Utah Administrative Code, the person responsible for a spill shall immediately take appropriate action to minimize the threat to human health and the environment. The Permittee shall notify the DEQ Hotline at (801) 536-4123 if the spill is greater than 25 gallons or for smaller spills that pose threat to human health or the environment.
- II.F.2. Responders shall take action to prevent a spill from spreading by utilizing absorbent, booms, pads, rags, etc.
- II.F.3. Once the material is containerized, a waste determination shall be made to determine the material's disposition.
- II.F.4. The Permittee is responsible for the material release and shall recover oil and remediate any residue from the impacted soils, water, or other property, or take any other actions as required by the Director until there is no longer a hazard to human health or the environment.
- II.F.5. All costs associated with the cleanup shall be at the expense of the Permittee.
- II.F.6. The Permittee shall maintain spill cleanup kits in the used oil storage areas.
- II.F.7. Facility spill kits shall contain, at a minimum, the equipment listed in Attachment 3 of this Permit and shall be inspected weekly.

- II.F.8. The Permittee shall report all relevant information, including the amount of waste generated from cleanup efforts, the characterization of the waste (i.e. hazardous or non-hazardous), final waste determination, and disposal records. The report shall also include actions taken by the Permittee to prevent future spills.
- II.F.9. An air, rail, highway or water transporter who has discharged used oil shall give notice, if required by 49 CFR 171.15, to the National Response Center at <http://nrc.uscg.mil/nrchp.html>, (800) 424-8802 or (202) 426-2675. In addition to the notification above, a written report, as required in 49 CFR 171.16, shall be presented to the Director, Office of Hazardous Materials Regulations, Materials Transportation Bureau located in Washington, D.C., 20590.
- II.F.10. In accordance with R315-15-9.4 of the Utah Administrative Code, the Permittee shall submit to the Director a written report within 15 days of any reportable release of used oil.

II.G. Facility Closure

- II.G.1. The Permittee shall implement the closure plan in Attachment 1, which evaluates the potential impacts of used oil operations on the surrounding soil, groundwater and surface water in accordance with R315-15-11 of the Utah Administrative Code. The Permittee shall be responsible for any cleanup of any used oil contamination that has migrated beyond the facility property boundaries in accordance with R315-15-11(d) of the Utah Administrative Code.

Attachment 1

CLOSURE PLAN



USED OIL ABOVEGROUND STORAGE TANK CLOSURE PLAN

PILOT THOMAS LOGISTICS
1157 East 135 South
Vernal, Utah 84078

October 6, 2017

Prepared by:

Apex Companies, LLC
743 Horizon Court, Suite 110
Grand Junction, CO 81506

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1.0 FACILITY INFORMATION

Facility Location

Pilot Thomas Logistics
1157 East 135 South
Vernal, Utah 84078

Facility Type

Onshore bulk storage of gasoline, diesel fuel, lubrication oils, used oil and solvents

Date of Initial operation

Approximately 1980

Date of current owner acquisition

March, 2015

Service Areas

Uintah and Duchesne Counties, Utah

1.1 Person Responsible for Used Oil Operations at the Facility

Mr. Darren Anderson
1521 South 1500 East
Vernal, Utah 84078
435-789-1832 (o)
435-823-7560 (c)

1.2 Facility Operator

Mr. Darren Anderson
1521 South 1500 East
Vernal, Utah 84078
435-789-1832 (o)
435-823-7560 (c)

2.0 PURPOSE OF THE PLAN

The purpose of this written plan is to:

- Minimize the need for further maintenance; and
- Control, minimize, or eliminate, to the extent necessary to protect human health and the environment, post-closure escape of used oil, used oil constituents,

leachate, contaminated run-off, or used oil decomposition products to the ground or surface waters, or to the atmosphere.

The plan is also to comply with the closure requirements of the State of Utah regulations R315-15-11.

The following identifies the protocol and systems Pilot Thomas Logistics will implement to perform partial and/or final closure of the facility.

3.0 CLOSURE PLAN

This plan will be implemented as required under the Utah Administrative Code R315-15-11.2. The Pilot Thomas Logistics bulk storage is currently not used for the purposes of used oil storage; however, maintains a permit in the event storage is needed. Historically the facility consisted of a conglomerate of tanks used for the storage of petroleum hydrocarbons. Only one tank has been consistently maintained for used oil storage. The tank location has been designated as Management Unit #1 for purposes of this plan. The 3,000 gallon tank has been situated within a concrete secondary containment structure (also referred to as a pit) in the northwest corner of the building. The containment is 16 feet long by 8 feet wide and 3 feet deep. The tank is 5/16 inch painted sheet metal and does not have a vent line or piping. The tank is accessed for filling or extraction using the port at the top of the tank.

Management unit #2 is the yard area which has historically been used as a storage location for totes and tanks, containing used oil. The used oil maintained at the facility was from the collection containers located in Management Unit #2 to the tank in Management Unit #1. The maximum capacity of each tote was 330 gallons and approximately 20 totes had been stored on site at any given time during operation. The total used oil capacity for the facility was 9,600 gallons including the totes and tank.

Other virgin hydrocarbon materials are stored on site both within the building and in containers on the exterior of the building, but are not part of the used oil storage or processing. It is not anticipated or required that the facility as a whole will require closure as part of the used oil closure process. Only Management Unit #1 and #2 are the sections of the facility that require closure under the regulation.

3.1 Management Unit Closure

3.1.1 Used Oil - Management Unit #1 Closure

To initiate closure of Management Unit #1, water will be evacuated from the secondary containment area, if it exists at the time. The surrounding secondary containment system consists of concrete walls with a thickness of eight inches.

The tank will be evacuated of any residual oils or sludges. The material will be containerized until it is characterized for proper disposal. After evacuation, the tank will be inerted and cleaned. The rinsate material will also be containerized, characterized and disposed of in accordance with applicable laws. Once clean, the tank will be removed from the pit and reused or recycled.

Upon completion of the used oil evacuation of the tank, the secondary containment will be visually assessed to determine if the containment had been compromised. Staining will be removed with solvents to remove residual oil. All solution and rinsate water will be containerized in appropriate containers until it can be characterized for proper disposal.

3.1.2 Used Oil Exterior Storage - Management Unit #2 Closure

All containers stored within Management Unit #2 will be evacuated of any residual oils or sludges. The contents and totes will be reused, recycled or removed for proper disposal.

3.2 Testing and Removal of Oils, Oil Residues and Water

All sample analysis will occur at a State of Utah accredited laboratory. Unless otherwise specified, analysis will consist of:

- SVOC
- VOCs
- PAH
- RCRA Metals
- PCBs (congener analysis)

During evacuation of the tank and cleaning of the secondary containment (pit), residual used oil, sludges and rinsates will be analyzed for the above constituents, in addition to pH, reactivity, corrosivity and ignitability. The materials will be stored in compatible containers until analytical results are evaluated and the proper disposal arrangements can be made.

A soil sample will be collected from an area beneath the secondary containment either by drilling a through the containment or, if possible, slant drilling on the exterior of the building. Soil samples will be collected from the surface and four feet below surface. Soils will be analyzed for the constituents listed above.

If necessary, used oil within the totes in Management #2 will be characterized. It is anticipated that the used oil can be recycled through permitted operators.

Upon removal of the totes in Management Unit #2 the surrounding soils will be assessed for evidence of impacts. If identified, boreholes will be advanced, either manually with a hand auger, if feasible, or mechanically, with a drill rig. Sample locations will be determined by the Utah Department of Environmental Quality (UDEQ) and an Environmental Engineer, Scientist, or Geologist. Samples will be transferred from the sampling device directly to sample containers using methods to prevent cross contamination and ensure sample integrity. Samples will be obtained at a depth of 6 to 12 inches below ground surface (bgs) and at a depth of 4 to 6 feet bgs. If groundwater is encountered at a depth of less than 9 feet bgs, water samples will be collected with a peristaltic pump.

Provided analytical results from the soils and groundwater are below the State of Utah cleanup standards, no further action will be necessary. If, however, analytical results exceed thresholds, a Site Investigation Report and Work plan will be submitted to the UDEQ for review and approval. Pilot Thomas Logistics will implement the work plan within 30 days following UDEQ approval. Site closure will be deemed complete upon receipt of a No Further Action letter issued by UDEQ.

If used oil storage needs at the facility decline, Pilot may begin some of the activities above before requesting full closure of the site. It is anticipated that the exterior storage areas identified in Management Unit #2 will not be needed in the future. If Pilot decides to proceed with partial closure, they will proceed in accordance with the work plan described above.

3.3 Cost Estimate

The estimated cost for the final and complete closure of Management Unit #1 and #2 is **\$36,235.10**. This cost is based on the following:

Task	Estimated Cost
Oil Removal – 9,600 gallons (3,000 gallon tank and 20 x 330-gallon totes) @ \$0.08/gallon	\$ 768
Non-Entry Washout of 3,000 gallon used oil tanks	\$4,000
Contaminated soil removal (portable totes on dirt)	\$1333
Contaminated soil removal supervision	\$500
Transportation and disposal of contaminated soil	\$400
Containment cleaning via power washer of warehouse containment and outside concrete dock. Recovery of wash water	\$2,000
Rinsate and tank sampling	\$1,000
Rinsate and tank disposal	\$1,000
Design and Sampling Plan	\$2,500
Concrete Cuts	\$ 500
One Day GeoProbe – minimum of two boreholes	\$6,500
Environmental Professional Oversight and Sample Collection	\$4,000
Laboratory Analysis (assumes at least 9 samples)	\$8,190
PE Review and Signature (2 hours)	\$ 250
10% contingency	\$3,294.10
Total Surety Required	\$36,235.10

This estimate assumes that no samples will require hazardous disposal and all soil samples will be within State of Utah thresholds.

4.0 TIME ALLOWED FOR CLOSURE

Pilot Thomas Logistics will notify UDEQ of anticipated closure 60 days prior to implementation of the closure plan.

5.0 CERTIFICATION OF CLOSURE

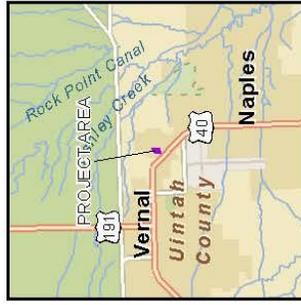
Within 60 days of completion of closure, Pilot Thomas Logistics will submit, by registered mail, a certificate that the used oil facility has been closed in accordance with the approved closure plan. The certification will be signed by Pilot Thomas Logistics management and by an independent registered professional engineer.

FIGURES



**Vernal Bulk Storage
Used Oil Transfer Facility Permit
UOP - 0075
Figure 1 - Area Map**

Legend
Property Boundary

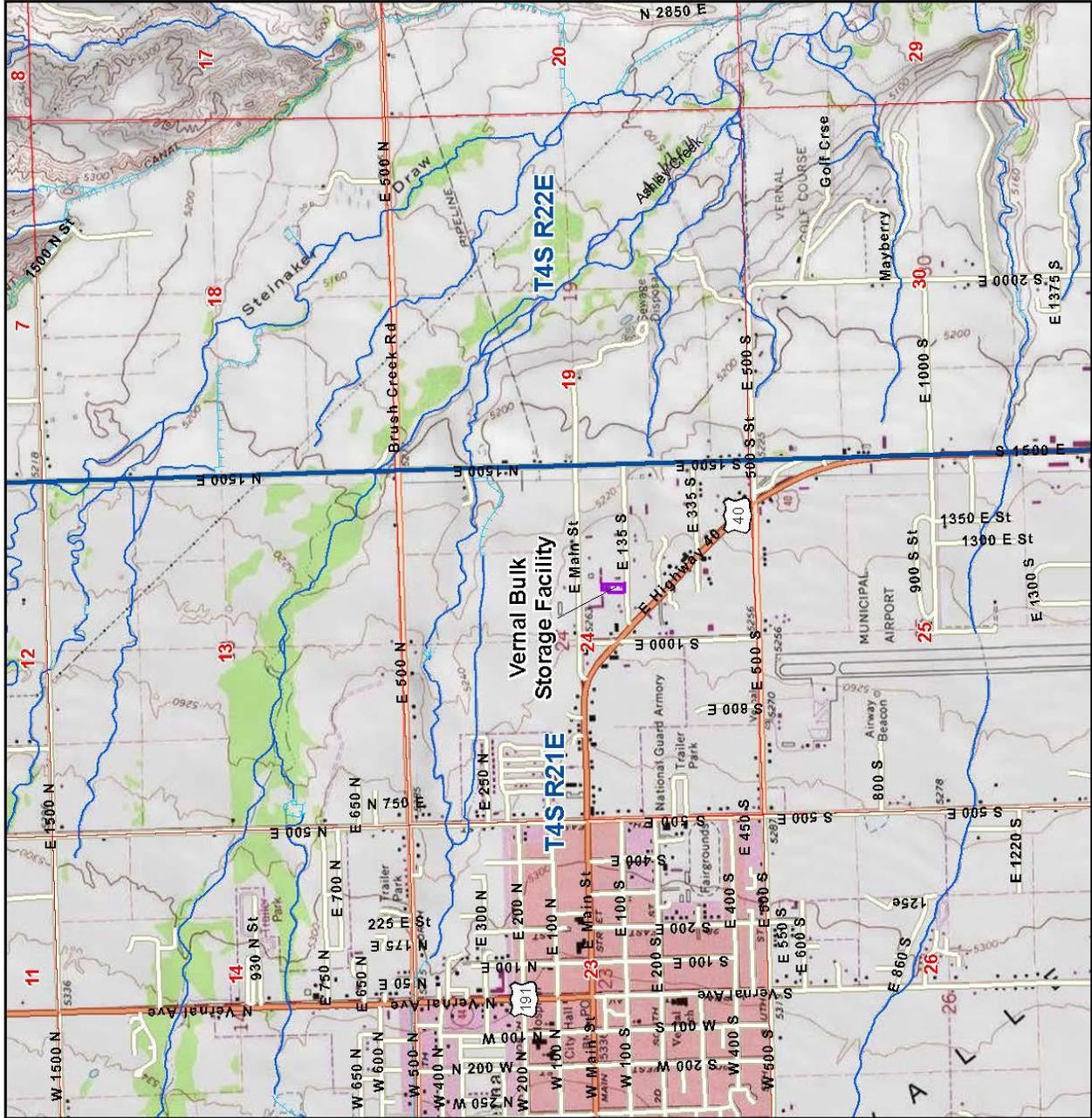


Site Characteristics

Location: NWSE, Sec 24, T4S R21E
County: Uintah
Land Use: Developed
Pre-Construction Vegetation Coverage: NA
Topography: 0-2%
Run-Off Risk: Low
Soil Type: Blackston loam
Receiving Waters: Unnamed trib., 1.800 ft Northeast

REVISED	BY	COMMENT
5/22/25	SB	Figure 1

A-TEX
P:\Projects\UOP_Storage_Fig_1\108383.dwg
April Company, LLC
1000 West Park, Trustee, Logan, UT
www.aprilcompany.com

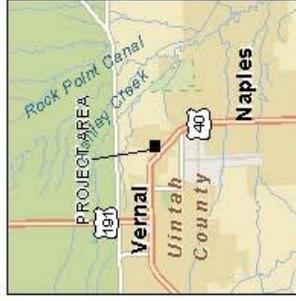




**Vernal Bulk Storage
Used Oil Transfer Facility Permit
UOP - 0075**

**Figure 2 - Management
Unit Locations**

- Legend**
- Management Unit
 - Asphalt/Concrete Surface
 - Building
 - Property Boundary
 - Proposed Borehole Locations



Site Characteristics

Location: NMSE, Sec 24, T4S R21E
County: Utah
Land Use: Disturbed
Pre-Construction Vegetation Coverage: NA
Pre-Construction Vegetation Cover: NA
Proposed Use: UOZ
Run Off Risk: Low
Soil Type: Blakiston loam
Receiving Waters: Unnamed trib.
1,800 ft. Northeast

REVISION	BY	COMMENT
10/17/2016	BJB	Figure 2

ALTEX
Aqua Corporation, LLC
www.altext.com
1401 S. 10th Street, Suite 212, Fort Collins, CO 80526



Attachment 2

SAMPLING AND ANALYSIS PLAN

The transfer facility shall test all used oil for total halogen content prior to taking receipt of the used oil from the authorized transporter, unless rebuttal assumption is used, to demonstrate that the used oil is not a hazardous waste. Total halogen content will be determined by PTL team members using an on-site field test. Field testing will be performed in accordance with EPA Method SW-846 9077, using the following commercially available test kit, or equivalent brand:

- Dexsil® CLOR-D-TECT 1000, and/or
- Dexsil® CLOR-D-TECT Q4000

All tests will be conducted in accordance with the manufacturer's directions. Each container of oil received by the facility must be tested individually. If a test reveals that the total halogen content is greater than 1000 ppm for any container, the oil will not be accepted unless PTL successfully rebuts the rebuttable presumption in a manner approved by the Division of Waste Management and Radiation Control (DWMRC).

Sample Collection:

1. When performing sample collection, the Permittee shall ensure a representative sample is collected from vehicle tanks, totes, drums or other containers, if required, using sampling method in accordance with the procedures in this attachment. Sampling personnel shall be trained on appropriate sampling methods for each type of container and matrix (see below).
2. The permittee shall ensure that drums or containers of used oil arriving at this facility from different sources or processes have been sampled individually prior to arrival, in keeping with the Permittee's transformer permit.

Halogen Verification Methods

1. Halogen Field Screening Methods
2. When the Permittee screens the incoming used oil to verify halogen concentration, the Permittee shall use a halogen field screening method in accordance with the following requirements:
 - 2.a. Used oil that contains less than 20% water shall be screened for halogens with a CLOR-D-TECT® halogen test kit (EPA Method 9077).
 - 2.b. Used oil that contains between 20% and 70% water shall be screened for halogens with a HYDROCLOR-Q® test kit. The resulting halogen concentration must be corrected using the following conversion formula to calculate true halogen concentration.

True Halogen Concentration = Reading Syringe + [(10 + ml oil in sample)/10]

Example: sample contains 6 ml water and 4 ml oil (60% water) and the syringe reading is 2,000 ppm, then the true concentration is:

$$2,000 \text{ ppm } [(10 + 4)/10] = 2,800 \text{ ppm}$$

- 2.c. Used oil that contains greater than 70% water shall be screened for halogens with a HYDROCLOR-Q[®] test kit. Correction of the halogen screening results is not required.
3. The Permittee shall document on acceptance records or bill of lading the screening results.

Halogen Laboratory Analytical Methods

1. When the Permittee submits a representative used oil sample to a Utah-certified laboratory to analyze for total halogen concentration, the Permittee shall use Method 9076 or other equivalent method approved by the Director.
2. The Permittee shall document the analytical results on the facility tracking records.

Halogen Generator Knowledge Method

1. The Permittee shall have information on file, (e.g., analytical testing, industry process knowledge) from the generator which is sufficient, as determined by the Director, to support the use of generator knowledge.
2. The Permittee may not accept the use of a safety data sheet (SDS) as the sole source in making a halogen concentration determination.
3. The Permittee shall document on the acceptance record "Generator Knowledge" with an appropriate identifier, e.g., profile ID for used oil collected.
4. Used oil determined to be on-specification by a Utah-registered marketer can be accepted at the facility without further testing. Bills of lading, manifests or other used oil tracking records shall include copies of the analytical results for reference.

PCB Contaminated Used Oil

1. The Permittee shall not accept used oil with PCB concentrations greater than or equal to 50 mg/kg. Used oils containing PCB concentrations greater than or equal to 50 mg/kg are subject to TSCA regulations 40 CFR 761. Used oils containing PCB concentrations greater than or equal to 2 mg/kg but less than 50 mg/kg are subject to both R315-15 of the Utah Administrative Code and 40 CFR 761.
2. The Permittee shall obtain analytical results of dielectric oil used in transformers and other high voltage devices, verifying the PCB concentrations are less than 50 mg/kg prior to accepting the used oil at the transfer facility.
3. Used oil may not be diluted to avoid any provision of any federal or state environmental rules.

4. Tanks, containers, and vehicles used to transport used oil with PCB concentrations greater than or equal to 2 mg/kg shall be presumed to be contaminated with PCBs. Subsequent loads and volumes of used oil in these PCB-contaminated tanks, containers, and vehicles shall be presumed to have been contaminated with PCBs and to contain a quantifiable PCB concentrations of 2 mg/kg or greater unless the equipment has been decontaminated as described in 40 CFR761 Subpart S.
6. Table 2-1 lists required laboratory PCB sample preparation and analytical methods.

Table 2-1: PCB Sample Preparation and Analytical Methods

Sample Preparation Methods	Analytical Methods	Analytes		
		PCB CAS RN	PCB Aroclor	
3500C, 3580A and 3665A (Cleanup)	<ul style="list-style-type: none"> • 8082A • PCB Analytical Method • Analyses of the Aroclors bolded/* in the last column are mandatory. • Choose an additional two Aroclors from the last column for analysis which could be contained in the oil, which will make a total of seven Aroclors. 			
			12674-11-2	1016*
			147601-87-4	1210
			151820-27-8	1216
			11104-28-2	1221*
			37234-40-5	1231
			11141-16-5	1232*
			71328-89-7	1240
			53469-21-9	1242*
			12672-29-6	1248*
			165245-51-2	1250
			89577-78-6	1252
			11097-69-1	1254*
			11096-82-5	1260*
			37324-23-5	1262
	11100-14-4	1268		

Attachment 3

SPILL PLAN

Response to Releases

Upon detection of a release of used oil the following cleanup steps will occur:

1. Stop the release;
2. Contain the released used oil;
3. Refer to the site's Emergency Action plan for further instructions;
4. Properly clean up and manage the released used oil and other materials; and
5. If necessary, repair or replace any leaking used oil storage containers or tanks prior to returning them to service.
6. A PTL team member will notify the Utah State Department of Environmental Quality, 24-hour Answering Service, 801-536-4123 for used oil releases exceeding 25 gallons, or smaller releases that pose a potential threat to human health or the environment.

Table: 3-1: Emergency Contacts List (Company Personnel)

Contact Person	Title	Contact Information
Darren Anderson	Facility Coordinator	Mobile: 435-823-7560 Darren.Anderson@pilotthomas.com
Michael O'Harrow	Regional Operations Manager	Mobile: 307-252-0431 Mike.O'harrow@pilotthomas.com
Richard Heaton	VP of Operations	Mobile: 307-212-0590 Rick.Heaton@pilotthomas.com
Bryan Christian	Environmental Compliance Manager	Mobile: 304-550-1724 Office: 304-204-1794 Bryan.Christian@pilotthomas.com
Fire Response (In case of fire or injury)	NA	911

Enviro Care Inc.	Response/Cleanup Contractor	Office: 800-820-9058
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Table 3-2: Agency Notification Numbers

<i>Agency</i>	<i>Contact Phone Number</i>
EPA National Response Center (NRC)	(800) 424-8802
Utah Department of Environmental Quality (within 24 hrs.)	(801) 536-4123
Utah State Highway Patrol	(801) 538-3400

Spill Response

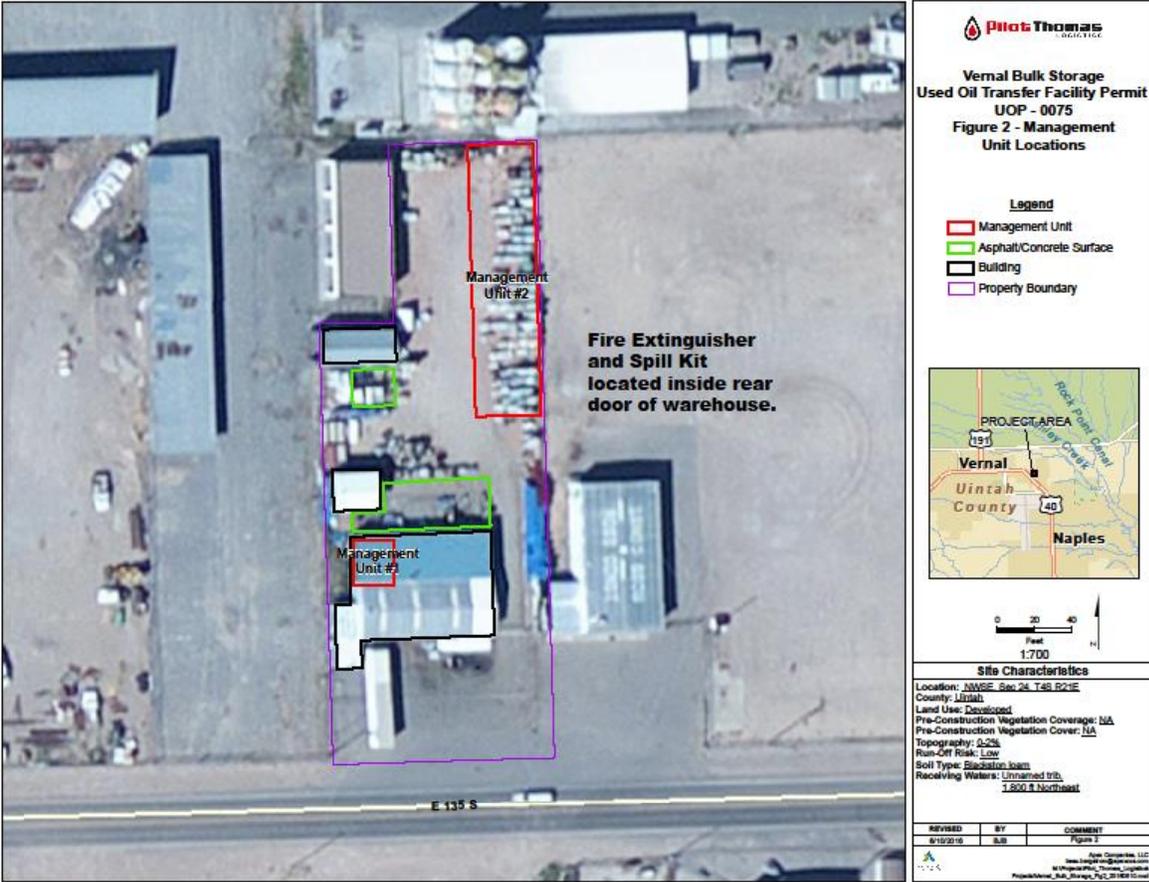
Spill Kits are to be readily available. Spill kits include three 4' booms, package of absorbent pads, and 50 lbs. granulated absorbent, such as Oil Dry. Location of fire extinguisher and spill response kits are noted on site map below.

Table 3-3: Spill Kit Requirements

Equipment Description	Quantity
4-ft Booms	3
Spill pads	1 package
Granulated absorbent	50 lbs
Shovel	1
Spill Plan with Emergency Contact Numbers	1

Emergency Action Plans

PTL has made available site specific Emergency Action Plans. The plans are posted in the office located at the entrance to the facility.



Housekeeping

All efforts to prevent leaks and spill will be taken. During loading and unloading operations, portable containments will be placed beneath pumps and hose connections to capture any leaks or spills. Buckets will also be used to catch any drips. The portable containments are capable of containing approximately 40 gallons of oil. In the event of a leak or spill, it will be immediately remediated. Any absorbent materials used or contaminated soil will be characterized and properly disposed of at an approved facility.

Attachment 4
TRAINING PLAN

In addition to the requirements of Condition 11.2 of this permit, the Permittee shall follow the training plan below.

PTL team members who handle used oil must participate in a training session to discuss proper handling and proper response to spills of used oil. Other topics of training will include, but are not limited to:

1. Cradle to grave documentation
2. Field testing oil for halogen content using the approved sampling method
3. Spill prevention
4. Emergency Response Plan

The used oil training is in addition to the SPCC training and will be completed annually. Documentation of the training activities must be maintained as defined in the SPCC Program. Because this location is unmanned, training records will be maintained at the corporate office. PTL shall follow the training requirements in section II.E of this permit.

Attachment 5

USED OIL FILTERS

PTL will dispose of non-terne (lead free) plated used oil filters as a non-hazardous solid waste when filters are not mixed with hazardous wastes and are gravity hot-drained. "Gravity hot-drained" means drained for not less than 12 hours near operating temperature but above 60 degrees Fahrenheit. A non-terne used oil filter is a container of used oil and is subject to R315-15 until it is gravity hot-drained by one of the following methods:

1. Puncturing the filter anti-drain back valve or the filter dome end and gravity hot-draining;
2. Gravity hot-draining and crushing;
3. Dismantling and gravity hot-draining;
4. Any other equivalent gravity hot-draining method authorized by the Director that will remove used oil from the filter at least as effectively as the methods listed in R315-15-1.6(b)(1) through (3).
5. Draining of filters will occur using a grate over the used oil storage tank.

Used oil filters will be managed as Used Oil until they are gravity hot drained in accordance with R315-15.