



**Florida Department of  
Environmental Protection  
Hazardous Waste Inspection Report**

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**FACILITY INFORMATION:**

**Facility Name:** Howco Environmental Services

**On-Site Inspection Start Date:** 04/23/2009

**On-Site Inspection End Date:** 04/23/2009

**ME ID#:** 1038

**EPA ID#:** FLD152764767

**Facility Street Address:** 843 43rd St S, St Petersburg, Florida 33711-1922

**Contact Mailing Address:** 843 43rd St S, St Petersburg, Florida 33711-1922

**County Name:** Pinellas

**Contact Phone:** (727) 327-8467

**NOTIFIED AS:**

SQG (100-1000 kg/month)

**INSPECTION TYPE:**

Permitting Inspection for Used Oil Processor facility

Routine Inspection for Used Oil Transporter facility

Routine Inspection for Used Oil Marketer facility

Routine Inspection for Used Oil Generator facility

Routine Inspection for CESQG (<100 kg/month) facility

**INSPECTION PARTICIPANTS:**

**Principal Inspector:** Kelly M. Honey, Environmental Specialist III

**Other Participants:** Richard Dillen, Quality Assurance Officer; Brian Gross, Environmental Scientist; Lee Morris, Director of Operations

**LATITUDE / LONGITUDE:** Lat 27° 45' 40.8037" / Long 82° 41' 32.5519"

**SIC CODE:** 2999 - Manufacturing - petroleum and coal products, nec

**TYPE OF OWNERSHIP:** Private

**Introduction:**

HOWCO Environmental Services (HOWCO) was jointly inspected by the United States Environmental Protection Agency (USEPA) and the Florida Department of Environmental Protection (Department) to evaluate the facility's compliance with state and federal hazardous waste regulations. Brian Gross, Environmental Scientist, led the inspection on behalf of the USEPA. The inspectors were accompanied throughout by Richard Dillen, who manages the Laboratory, and Lee Morris, who manages the Yard. The facility was last inspected by the Department on August 15, 2008. HOWCO has a used oil processing permit issued by the Department on July 7, 2007.

**Process Description:**

HOWCO stores, processes and markets used oil and is a registered used oil filter transporter and processor, as well. Additionally, HOWCO accepts oily waste solids which are processed and solidified prior to disposal. As a result of the lab wastes generated during QA testing, HOWCO is also a conditionally exempt small quantity generator of hazardous waste (CESQG). The processes at the facility have not changed since the previous inspection. During this inspection, the Department had the opportunity to inspect one of HOWCO's transport vehicles that was not currently on the road, and it was found to be equipped with used oil testing kits and emergency equipment, such as fire extinguishers.

HazMat supplies are stored in one of three large trailers on the south side of the property. The contents of the HazMat trailer included drums of fire suppression foam, as well as spill control equipment. During the inventory of this equipment, it was determined that some of the Tyvek

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suits referenced on HOWCO's inventory list were significantly deteriorated. It is recommended that HOWCO inspect these items more frequently to ensure that there is a full inventory of emergency response equipment, as required by Part I.14(c) of its permit. One of the facility's bullhorns was tested and found to be operable. The fire and emergency equipment are inspected monthly and tested annually.

At the time of this inspection, HOWCO was in the process of replacing its condenser unit, and therefore, no used oil processing was occurring. HOWCO was also taking the opportunity while the system was down to replace some pumps, valves, etc. There was some used oil observed around these work areas, but overall, the secondary containment was found to be free of used oil and stormwater. There were two 20-cubic yard rollofs near the WTU sludge processing tanks that contained sludges removed from the cooker tanks. The rollofs were labeled and covered. Used oil was observed in the rollofs, and staff said that it seeps from the sludge, rises to the surface and is transferred to the processing storage tanks daily using a vacuum truck. When all the free liquid is removed from the sludge, it will be taken to Pinellas County's Waste-to-Energy facility for incineration after being solidified with mulch provided by the County for this purpose.

It was observed that although the yard was much cleaner than in previous inspections, there were several areas where the asphalt was completely deteriorated and lifting off in chunks. It was also observed that a large part of the yard was blocked off with cones, and Mr. Morris said that HOWCO was getting the yard recoated with asphalt. Tampa Paving Constructors has been contracted to recoat the rear portion of the yard from the washing area to the filter block loading bay. It was noted that some of the deteriorated asphalt was outside this specified area, and Mr. Morris was directed to please recoat all suspect areas of the yard. When the Department returned to the facility to review records on 05-27-09, it was observed that the yard still had not been recoated. Given the extremely poor condition of some sections of the asphalt, HOWCO needs to recoat the yard as soon as possible.

Because much of the yard had been emptied due to the planned recoating, the used oil filter processing and oily waste storage areas were somewhat overcrowded. At the time of the inspection, there were approximately 85 drums of used oil filters in storage with inadequate room to walk around or read the labels on these drums. This is a violation of Part I.14(e) of HOWCO's permit, which requires the facility to maintain aisle space sufficient to inspect drums and read labels. HOWCO personnel began rearranging the drums during the inspection. Crushed used oil filters are shipped to a smelter. Used oil collected in the crushing unit is transferred to tank #109.

There were additional drums in the staging area storing absorbents, gloves and other oily solid waste, as well as 13 drums of used hydraulic oil received from Clean Harbors located nearby on the solid waste pad. There was more room around the drums, however, it is recommended that HOWCO improve housekeeping and storage in these areas, as not all the labels could be easily read, and the drums from Clean Harbors were stacked two-high and did not appear stable. It was observed during the site visit of 05-27-09 that the drums of used hydraulic oil had been processed.

Solid waste managed at the facility includes oily solid waste generated by HOWCO and its customers. Solid waste streams received are analyzed at least once every five years in accordance with the permit. The WTU sludge generated at the facility is to be analyzed annually, but at the time of inspection, the required analyses had not yet been performed which is a violation of Part II.6 of HOWCO's permit. The sludge was sampled on April 23, 2009, after the inspection, and results indicate that the filter cake is nonhazardous. Solid waste is either sent to a landfill or to the incinerator.

The Maintenance Shop generates used oil, used antifreeze and oily waste. There is also a 25-gallon parts washer in use. Wastes observed here include 55-gallon drums of used oil filters, spent sorbents, used oil, used antifreeze and oily rags. There were also some smaller containers like drain pans, and step cans. There was one 5-gallon bucket containing used oil that was not properly labeled. The contents of this container were transferred to the storage drum. Used oil and antifreeze containers are equipped with secondary containment as applicable. It was noted that the area around the used oil drum appeared messy, and the Department recommends

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reviewing proper housekeeping procedures with Maintenance staff. Batteries are returned to the vendor for core credit.

Behind the laboratory, there are two 55-gallon drums of used oil in secondary containment. The drums are covered, labeled and provided with containment. The drums collect sample waste from the laboratory. Processed oil is randomly sampled biweekly and tested to confirm it is on-spec. Metal analyses are done off site by PhosLab. Samples of processed oil are retained in the laboratory for thirty days. Hazardous COD testing waste is generated in the laboratory, and spent vials are accumulated in a box labeled "spent vials." Staff said fluorescent lamps are taken on CESQG days to the County collection center for disposal, which is also how laboratory wastes are disposed of. Hazardous wastes have not been disposed of since the last inspection.

Records were reviewed and found to be complete and up to date with the following exception. The facility's contingency plan did not have the currently designated emergency coordinators. On 05-13-09, HOWCO submitted a revised list of emergency coordinators to the previous plan recipients. Most HOWCO employees, including all the designated emergency coordinators, attended a Used Oil Management Workshop on 05-22-09, and all HOWCO drivers also attended the associated Driver Training Class. Based on the review of manifests, HOWCO is doing a better job of recording its customers' EPA ID numbers as required by Rule. Please note that there was a typographical error on the paperwork for Lakeland Chrysler where the EPA ID number is incorrectly recorded as "FLD 982 100 343 4." The correct EPA ID number for this generator is "FLD 982 103 434."

**New Potential Violations and Areas of Concern:****Checklist Independent Potential Violations and Areas of Concern**

Type:	Area Of Concern
Rule:	262.11
Explanation:	HOWCO did not timely analyze the WTU sludge to confirm it is still nonhazardous. This is required annually by Part II.6 of the permit.
Corrective Action:	The sludge was sampled immediately following the inspection. Analyses indicate the WTU sludge is nonhazardous.

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Type:	Violation
Rule:	279.52(a)(5)
Explanation:	There was inadequate aisle space in the used oil filter drum storage area. (corrected)
Corrective Action:	HOWCO personnel rearranged the drums during the inspection.

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Type:	Violation
Rule:	279.52(b)(2)(iv)
Explanation:	The plan did not list the currently designated emergency coordinators. (corrected)
Corrective Action:	On 05-13-09, HOWCO sent a revised list of emergency coordinators to previous plan recipients.

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Type:	Violation
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Rule: 279.22(c)(1)

Explanation: There was a 5-gallon bucket of used oil in the Maintenance Shop that was not labeled. (corrected)

Corrective Action: The contents of the bucket were transferred to an appropriate container.

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**Summary of Potential Violations and Areas of Concern:**Potential Violations

Rule Number	Area	Date Cited	Explanation
Checklist Independent Violations			
279.52(a)(5)		04/23/2009	There was inadequate aisle space in the used oil filter drum storage area. (corrected)
279.52(b)(2)(iv)		04/23/2009	The plan did not list the currently designated emergency coordinators. (corrected)
279.22(c)(1)		04/23/2009	There was a 5-gallon bucket of used oil in the Maintenance Shop that was not labeled. (corrected)

Areas of Concern

Rule Number	Area	Date Cited	Explanation
Checklist Independent Areas of Concern			
262.11		04/23/2009	HOWCO did not timely analyze the WTU sludge to confirm it is still nonhazardous. This is required annually by Part II.6 of the permit.

**Conclusion:**

Based on the observations made during this inspection, HOWCO was in violation of regulations applicable to used oil processors. The facility has returned to compliance.

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**Signed:**

A hazardous waste compliance inspection was conducted on this date, to determine your facility's compliance with applicable portions of Chapters 403 & 376, F.S., and Chapters 62-710, 62-730, 62-737, & 62-740 Florida Administrative Code (F.A.C.). Portions of the United States Environmental Protection Agency's Title 40 Code of Federal Regulations (C.F.R.) 260 - 279 have been adopted by reference in the state rules under Chapters 62-730 and 62-710, F.A.C. The above noted potential items of non-compliance were identified by the inspector(s).

This is not a formal enforcement action and may not be a complete listing of all items of non-compliance discovered during the inspection.

Kelly M. Honey

**PRINCIPAL INSPECTOR NAME**

Environmental Specialist III

**PRINCIPAL INSPECTOR TITLE**

FDEP

6/8/2009

**PRINCIPAL INSPECTOR SIGNATURE****ORGANIZATION****DATE**

Brian Gross

**INSPECTOR NAME**

Environmental Scientist

**INSPECTOR TITLE**

NO SIGNATURE

**INSPECTOR SIGNATURE**

US EPA Region IV

**ORGANIZATION**

Richard Dillen

**REPRESENTATIVE NAME**

Quality Assurance Officer

**REPRESENTATIVE TITLE**

NO SIGNATURE

**REPRESENTATIVE SIGNATURE**

HOWCO Environmental Services

**ORGANIZATION**

Lee Morris

**REPRESENTATIVE NAME**

Director of Operations

**REPRESENTATIVE TITLE**

NO SIGNATURE

**REPRESENTATIVE SIGNATURE**

HOWCO Environmental Services

**ORGANIZATION**

NOTE: By signing this document, the Site Representative only acknowledges receipt of this Inspection Report and is not admitting to the accuracy of any of the items identified by the Department as "Potential Violations" or areas of concern.