



Received

JUN 29 2010

BSHW

June 23, 2010

Used Oil Permit Coordinator
MS 4560
Florida Department of Environmental Protection
2600 Blair Stone Road
Tallahassee, FL 32399-2400

101 828 689
RE: FLD ~~152-764-767~~ - renewal

To whom it may concern,

Please find attached the following documents:

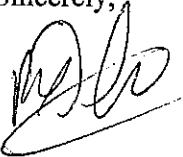
- Two (2) sets, renewal 'Application for a Used Oil Processing Permit'.
- Two (2) sets, renewal 'Application for a Solid Waste Permit'.
- One (1) check for the amount of \$ 2,000.00, processing fee Used Oil Permit.
- One (1) check for the amount of \$ 1,000.00, processing fee Solid Waste Permit.

The following changes were made since the last application, identified as Revision 5:

- 1) Attachment 1, page 2: Delete management of petroleum contact water.
- 2) Attachment 2, page 4: Delete management of petroleum contact water.
- 3) Attachment 3, page 5: Delete operation of the halogen leak detector.
- 4) Attachment 3, page 7: Delete Table 1.

- 5) Attachment 4, page 9: Clarify that oily solids removed from used oil are transferred to the HOWCO St. Petersburg facility and include latest rule changes.
- 6) Attachment 6, updated to reflect latest rule requirements.
- 7) Attachment 7, page 24: Revise Storage Tanks section.

Sincerely,

A handwritten signature in black ink, appearing to read 'RD', with a horizontal line underneath.

Richard Dillen
Q.A.O.

Cc: Mr. John White, FDEP/Orlando



Received Florida Department of Environmental Protection

JUN 29 2010

BSHW

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

DEP Form # 62-701.900(4), F.A.C.
Form Title: Application to Construct, Operate, or Modify a Waste Processing Facility
Effective Date: January 6, 2010
Incorporated in Rule 62-701.710(2), F.A.C.

APPLICATION TO CONSTRUCT, OPERATE, OR MODIFY A WASTE PROCESSING FACILITY

GENERAL REQUIREMENT: Solid Waste Management Facilities shall be permitted pursuant to Section 403.707, Florida Statutes (F.S.) and in accordance with Florida Administrative Code (F.A.C.) Chapter 62-701. A minimum of four copies of the application shall be submitted to the Department District Office having jurisdiction over the facility.

Please Type or Print in Ink

A. GENERAL INFORMATION

1. Type of facility (check all that apply):

[] Transfer Station

[x] Materials Recovery Facility:

[] C&D Recycling

[] Class III MRF

[] MSW MRF

[x] Other Describe: Used oil recycling.

[] Other Facility That Processes But Does Not Dispose Of Solid Waste On-Site:

[] Storage, Processing or Disposal for Combustion Facilities (not addressed in another permit)

[] Other Describe:

NOTE: C&D Disposal facilities that also recycle C&D, shall apply on DEP FORM 62-701.900(6), F.A.C.

2. Type of application:

[] Construction/Operation

[x] Operation without Additional Construction

3. Classification of application:

[] New

[] Substantial Modification

[x] Renewal

[] Intermediate Modification

[] Minor Modification

4. Facility name: HOWCO Environmental Services - Astor Facility

5. DEP ID number: FLD 101 828 689 County: Lake

6. Facility location (main entrance): 24133 State Road 40, Astor, Florida 32102

Northwest District
160 Government Center
Pensacola, FL 32501-5794
850-595-8360

Northeast District
7825 Baymeadows Way Ste 200B
Jacksonville, FL 32256-7590
904-807-3300

Central District
3319 Maguire Blvd., Ste. 232
Orlando, FL 32803-3767
407-894-7555

Southwest District
13051 N. Telecom Pky.
Temple Terrace, FL
813-632-7600

South District
2295 Victoria Ave., Ste. 364
Fort Myers, FL 33901-3881
239-332-6975

Southeast District
400 North Congress Ave.
West Palm Beach, FL 33401
561-681-6600

7. Location coordinates:

Section: 30 Township: T 15 S Range: R 28 E
Latitude: 29° 09' 46" Longitude: 81° 32' 26"

Datum: NAD83 Coordinate Method: Geographic coordinates

Collected by: N/A Company/Affiliation: N/A

8. Applicant name (operating authority): HOWCO Environmental Services

Mailing address: 701 Central Avenue St. Petersburg FL 33713
Street or P.O. Box City State Zip

Contact person: Tim Hagan Telephone: (727) 327-8467

Title: President & CEO thagan@howcousa.com
E-Mail address (if available)

9. Authorized agent/Consultant: Environeering, Inc.

Mailing address: 109 Azalea Point Drive South Ponte Vedra FL 32082
Street or P.O. Box City State Zip

Contact person: Tim Rudolph Telephone: (904) 665-0100

Title: Environmental Engineer timenvironeering@bellsouth.net
E-Mail address (if available)

10. Landowner (if different than applicant): N/A

Mailing address: N/A
Street or P.O. Box City State Zip

Contact person: N/A Telephone: () N/A

N/A
E-Mail address (if available)

11. Cities, towns and areas to be served: Central and east central Florida

12. Date site will be ready to be inspected for completion: N/A

13. Estimated costs:

Total Construction: \$ N/A Closing Costs: \$ 24,228.06

14. Anticipated construction starting and completion dates:

From: N/A To: N/A

15. Expected volume of waste to be received: 1.3 yds³/day 1.2 tons/day

16. Provide a brief description of the operations planned for this facility: Process used oil and oily wastes.

B. ADDITIONAL INFORMATION

Please attach the following reports or documentation as required.

1. Provide a description of the solid waste that is proposed to be collected, stored, processed or disposed of by the facility, a projection of those waste types and quantities expected in future years, and the assumptions used to make the projections (Rule 62-701.710(2)(a), F.A.C.).
2. Attach a site plan, signed and sealed by a professional engineer registered under Chapter 471, F.S., with a scale not greater than 200 feet to the inch, which shows the facility location, total acreage of the site, and any other relevant features such as water bodies or wetlands on or within 200 feet of the site, potable water wells on or within 500 feet of the site (Rule 62-701.710(2)(b), F.A.C.).
3. Provide a description of the operation and functions of all processing equipment that will be used, with design criteria and expected performance. The description shall show the flow of solid waste and associated operations in detail, and shall include (Rule 62-701.710(2)(c), F.A.C.):
 - a. Regular facility operations as they are expected to occur;
 - b. Procedures for start up operations, and scheduled and unscheduled shut down operations; and
 - c. Potential safety hazards and control methods, including fire detection and control.
4. Provide a description of the loading, unloading, storage and processing areas (Rule 62-701.710(2)(d), F.A.C.).
5. Provide the identification and capacity of any on-site storage areas for recyclable materials, non-processable wastes, unauthorized wastes, and residues (Rule 62-701.710(2)(e), F.A.C.).
6. Provide a plan for disposal of unmarketable recyclable materials and residue, and for waste handling capability in the event of breakdowns in the operations or equipment (Rule 62-701.710(2)(f), F.A.C.).
7. Provide a boundary survey, legal description, and topographic survey of the property (Rule 62-701.710(2)(g), F.A.C.).
8. Provide a description of the design requirements for the facility which demonstrate how the applicant will comply with Rule 62-701.710(3), F.A.C.
9. Provide an operation plan which describes how the applicant will comply with Rule 62-701.710(4), F.A.C. (Rule 62-701.710(2)(h), F.A.C.).
10. Provide a closure plan which describes generally how the applicant will comply with Rule 62-701.710(6), F.A.C. (Rule 62-701.710(2)(i), F.A.C.).
11. Unless exempted by Rule 62-701.710(10)(a), F.A.C., provide the financial assurance documentation required by Rule 62-701.710(7), F.A.C. (Rule 62-701.710(2)(j), F.A.C.).
12. Provide documentation to show that stormwater will be controlled according to the requirements of Rule 62-701.710(8), F.A.C.
13. Provide documentation to show that the applicant will comply with the recordkeeping requirements of Rule 62-701.710(9), F.A.C.
14. Provide a history and description of any enforcement actions by the applicant described in subsection 62-701.320(3), F.A.C. relating to solid waste management facilities in Florida. (Rules 62-701.710(2), F.A.C. and 62-701.320(7)(i), F.A.C.)

C. CERTIFICATION BY APPLICANT AND ENGINEER OR PUBLIC OFFICER

1. Applicant:

The undersigned applicant or authorized representative of HOWCO Environmental Services - Astor

is aware that statements made in this form and attached information are an application for a Solid Waste

Processing Permit from the Florida Department of Environmental Protection and certifies that the information in this application is true, correct and complete to the best of his/her knowledge and belief. Further, the undersigned agrees to comply with the provisions of Chapter 403, Florida Statutes, and all rules and regulations of the Department. It is understood that the Permit is not transferable, and the Department will be notified prior to the sale or legal transfer of the permitted facility.


Signature of Applicant or Agent

Tim Hagan - President and CEO
Name and Title (please type)

thagan@howcousa.com
E-Mail address (if available)

3701 Central Avenue
Mailing Address

St. Petersburg, FL 33713
City, State, Zip Code

(727) 327-8467
Telephone Number

6/11/2010
Date

Attach letter of authorization if agent is not a governmental official, owner, or corporate officer.

2. Professional Engineer registered in Florida (or Public Officer if authorized under Sections 403.707 and 403.7075, Florida Statutes):

This is to certify that the engineering features of this waste processing facility have been designed/examined by me and found to conform to engineering principles applicable to such facilities. In my professional judgment, this facility, when properly maintained and operated, will comply with all applicable statutes of the State of Florida and rules of the Department. It is agreed that the undersigned will provide the applicant with a set of instructions of proper maintenance and operation of the facility.


Signature

Tim Rudolph, P.E. - Engineer
Name and Title (please type)

39617
Florida Registration Number
(please affix seal)

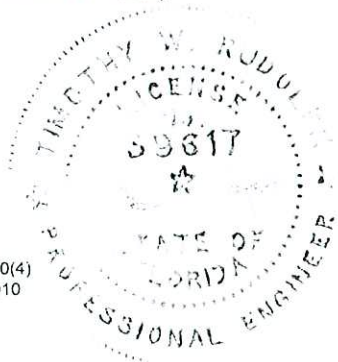
109 Azalea Point Drive South
Mailing Address

Ponte Vedra, FL 32082
City, State, Zip Code

timenvironeering@bellsouth.net
E-Mail address (if available)

(904) 665-0100
Telephone Number

6/11/2010
Date



APPLICATION FORM FOR A USED OIL PROCESSING FACILITY PERMIT

Part I

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

A. General Information

1. New [] Renewal [x] Modification [] Date old permit expires 08/25/2010

2. Revision number 3

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

- [x] generators (Subpart C)
[x] transporters (Subpart E)
[x] burners of off-spec used oil (Subpart G)
[x] marketers (Subpart H)

or [] are disposing of used oil (Subpart I)

4. Date current operation began: 2005

5. Facility name: HOWCO Environmental Services - Astor

6. EPA identification number: FLD 101 828 689

7. Facility location or street address: 843 43rd Street South, St. Petersburg, FL 33711

8. Facility mailing address: 24133 State Road 40 Astor Florida 32102
Street or P.O. Box City State Zip Code

9. Contact person: Tim Hagan Telephone: (727) 327 - 8467
Title: President & CEO

Mailing Address: 3701 Central Avenue St. Petersburg Florida 33713
Street or P.O. Box City State Zip Code

10. Operator's name: HOWCO Environmental Services Telephone: (727) 327 - 8467

Mailing Address: 3701 Central Avenue St. Petersburg Florida 33713
Street or P.O. Box City State Zip Code

11 Facility owner's name: Hagan Holding Company Telephone: (727) 327 - 8467

Mailing Address: 3701 Central Avenue St. Petersburg Florida 33713
Street or P.O. Box City State Zip Code

12 Legal structure:

- [x] corporation (indicate state of incorporation) Florida
[] individual (list name and address of each owner in spaces provided below)
[] partnership (list name and address of each owner in spaces provided below)
[] other, e.g. government (please specify)

If an individual, partnership, or business is operating under an assumed name, enter the county and state where the name is registered: County _____ State _____

Name: _____
Mailing Address: _____

Street or P.O. Box _____ City State Zip Code

Name: _____
Mailing Address: _____

Street or P.O. Box _____ City State Zip Code

Name: _____
Mailing Address: _____

Street or P.O. Box _____ City State Zip Code

Name: _____
Mailing Address: _____

Street or P.O. Box _____ City State Zip Code

13 Site ownership status: owned to be purchased to be leased _____ years
 presently leased; the expiration date of the lease is: _____

If leased, indicate:

Land owner's name: _____

Mailing Address: _____

Street or P.O. Box _____ City State Zip Code

14 Name of professional engineer Tim Rudolph Registration No. 39617

Mailing Address:
109 Azalea Point Drive South, Ponte Vedra, FL 32082

Street or P.O. Box _____ City State Zip Code

Associated with: Envroneering, Inc.

B. SITE INFORMATION

1. Facility location:

County: Lake

Nearest community: City of Astor

Latitude: 29° 09' 46" Longitude: 81° 32' 26"

Section: 30 Township: 15S Range: 28 E

UTM # 17-1058443/115 / 17-1467950/519

2. Facility size (area in acres): 1.29

3. Attach a topographic map of the facility area and a scale drawing and photographs of the facility showing the location of all past, present and future material and waste receiving, storage and processing areas, including size and location of tanks, containers, pipelines and equipment. Also show incoming and outgoing material and waste traffic pattern including estimated volume and controls.

C. OPERATING INFORMATION

1. Hazardous waste generator status (SQG, LQG) CESQG

2. List applicable EPA hazardous waste codes:

Possible D001, D007, & D008

3. Attach a brief description of the facility operation, nature of the business, and activities that it intends to conduct, and the anticipated number of employees. No proprietary information need be included in this narrative.

A brief description of the facility operation is labeled as Attachment 1, Rev. 3, 6/11/10

4. Attach a detailed description of the process flow should be included. This description should discuss the overall scope of the operation including analysis, treatment, storage and other processing, beginning with the arrival of an incoming shipment to the departure of an outgoing shipment. Include items such as size and location of tanks, containers, etc. A detailed site map, drawn to scale, should be attached to this description. (See item 4, page 4).

The facility's detailed process description is labeled as Attachment 2, Rev 3, 6/11/10
(enclosed)

5. The following parts of the facility's operating plan should be included as attachments to the permit application. (See item 5 on pages 4 and 5):

a. An analysis plan which must include:

- (i) a sampling plan, including methods and frequency of sampling and analyses;
- (ii) a description of the fingerprint analysis on incoming shipments, as appropriate; and
- (iii) an analysis plan for each outgoing shipment (one batch/lot can equal a shipment, provided the lots are discreet units) to include: metals and halogen content.

The analysis plan is labeled as Attachment 3, Rev3, 6/11/10 (enclosed)

b. A description of the management of sludges, residues and byproducts. This must include the characterization analysis as well as the frequency of sludge removal.

Sludge, residue and byproduct management description is labeled as Attachment 4, Rev3, 6/11/10
(enclosed)

c. A tracking plan which must include the name, address and EPA identification number of the transporter, origin, destination, quantities and dates of all incoming and outgoing shipments of used oil.

The tracking plan is included as Attachment 5, Rev2, 4/21/05

6. Attach a copy of the facility's preparedness and prevention plan. This requirement may be satisfied by modifying or expounding upon an existing SPCC plan. Describe how the facility is maintained and operated to minimize the possibility of a fire, explosion or any unplanned releases of used oil to air, soil, surface water or groundwater which could threaten human health or the environment. (See item 6, page 5).

The preparedness and prevention plan is labeled as Attachment 6, Rev3, 6/11/10 (enclosed)

7. Attach a copy of the facility's Contingency Plan. This requirement should describe emergency management personnel and procedures and may be met using a modifying or expounding on an existing SPCC plan or should contain the items listed in the Specific Instructions. (see item 7 on pages 5 and 6).

The contingency plan is labeled as Attachment 7, Rev3, 6/11/10 (enclosed)

8. Attach a description of the facility's unit management for tanks and containers holding used oil. This attachment must describe secondary containment specifications, inspection and monitoring schedules and corrective actions. This attachment must also provide evidence that all used oil process and storage tanks meet the requirements described in item 8b on page 6 of the specific instructions, and should be certified by a professional engineer, as applicable.

The unit management description is labeled as Attachment 8, Rev2, 4/21/05

9. Attach a copy of the facility's Closure plan and schedule. This plan may be generic in nature and will be modified to address site specific closure standards at the time of closure. (See item 9, pages 6 and 7).

The closure plan is labeled as Attachment 9, Rev2, 4/21/05

10. Attach a copy of facility's employee training for used oil management. This attachment should describe the methods or materials, frequency, and documentation of the training of employees in familiarity with state and federal rules and regulations as well as personal safety and emergency response equipment and procedures. (See item 10, page 7).

A description of employee training is labeled as Attachment 10, Rev2, 4/21/05

DEP Form#	62-710.901(6)(a)
Form Title	Used Oil Processing Facility Permit Application
Effective Date	June 9, 2005

APPLICATION FORM FOR A USED OIL PROCESSING PERMIT

PART II - CERTIFICATION

TO BE COMPLETED BY ALL APPLICANTS

Form 62-710.901(a). Operator Certification

Facility Name: HOCWCO Environmental Services EPA ID# FLD 101 828 689

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

Signature of the Operator or Authorized Representative*



Tim Hagan, President & CEO
Name and Title (Please type or print)

Date: 6/11/2010 Telephone: (727) 327-8467

* If authorized representative, attach letter of authorization.

DEP Form#	62-710.901(6)(b)
Form Title	<u>Used Oil Processing Facility</u> <u>Permit Application</u>
Effective Date	<u>June 9, 2005</u>

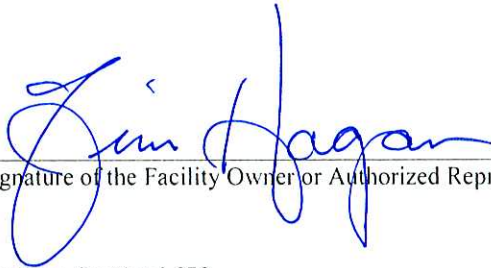
APPLICATION FROM FOR A USED OIL PROCESSING PERMIT

PART II - CERTIFICATION

Form 62-710.901(b). Facility Owner Certification

Facility Name: HOWCO Environmental Services EPA ID# FLD 101 828 689

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



Signature of the Facility Owner or Authorized Representative*

Tim Hagan, President & CEO

Name and Title (Please type or print)

Date: 6/11/10 Telephone: (727) 327-8467

* If authorized representative, attach letter of authorization.

DEP Form#	62-710.901(6)(c)
Form Title	Used Oil Processing Facility Permit Application
Effective Date	June 9, 2005

APPLICATION FROM FOR A USED OIL PROCESSING PERMIT

PART II - CERTIFICATION

Form 62-710.901(c) Land Owner Certification

Facility Name: HOWCO Environmental Services EPA ID# FLD 101 828 689

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



 Signature of the Land Owner or Authorized Representative*

Tim Hagan, President & CEO

 Name and Title (Please type or print)

Date: 6/11/10 Telephone: (727) 327-8467

* If authorized representative, attach letter of authorization.

DEP Form#	62-710.901(6)(d)
Form Title	Used Oil Processing Facility Permit Application
Effective Date	June 9, 2005

APPLICATION FORM FOR A USED OIL PROCESSING PERMIT

PART II - CERTIFICATION

Form 62-710.901(d) P. E. Certification [Complete when required by Chapter 471, F.S. and Rules 62-4.050, 62-761, 62-762, 62-701 and 62-710, F.A.C.]

Use this form to certify to the Department of Environmental Protection for:

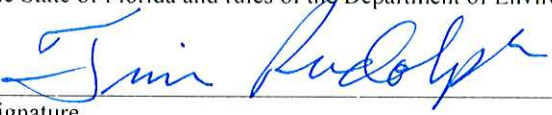
1. Certification of secondary containment adequacy (capacity), structural integrity (structural strength), and underground process piping for storage tanks, process tanks, and container storage.
2. Certification of leak detection.
3. Substantial construction modifications.
4. Those elements of a closure plan requiring the expertise of an engineer.
5. Tank design for new or additional tanks.
6. Recertification of above items.

Please Print or Type

_____ Initial Certification X _____ Recertification

1. DEP Facility ID Number: FLD 101 828 689 2. Tank Numbers: See Attachment 1
3. Facility Name: HOWCO Environmental Services - Astor
4. Facility Address: 24133 State Road 40, Astor, Florida 32102

This is to certify that the engineering features of this used oil processing facility have been designed/examined by me and found to conform to engineering principles applicable to such facilities. In my professional judgment, this facility, when properly constructed, maintained and operated, or closed, will comply with all applicable statutes of the State of Florida and rules of the Department of Environmental Protection.


 Signature
Tim Rudolph
 Name (please type)

Florida Registration Number: 39617

Mailing Address: 109 Azalea Point Drive South
 Street or P. O. Box
Ponte Vedra, FL 32082
 City State Zip

Date: 6/11/10 Telephone (904-665-0100

[PLEASE AFFIX SEAL]



ATTACHMENT 1

DESCRIPTION OF FACILITY OPERATIONS

HOWCO is a wholly-owned subsidiary of Hagan Holding Company, a Florida based company, located at 3701 Central Avenue, St. Petersburg, Florida. HOWCO is staffed with multi-disciplined, well-qualified employees dedicated to improving the environment. The company offers more than 27 years of environmental and recycling experience in the areas of used oil reclamation, industrial waste processing and emergency spill response.

HOWCO can operate 24 hours per day, 7 days a week performing the following operations:

- Oil recycling from used oil collected at various locations and transported to the facility.
- Processing a variety of oily solid wastes generated at the plant. The processing of used oil from industrial cleaning of oil tanks, oil water separators and other waste streams generating oily solids.
- Used oil and discarded oil filters with the intention of recovering oil and preparing metal for recycling as scrap metal.

HOWCO will operate a laboratory capable of performing liquid testing required to classify various wastes generated during the operation of the oil recovery process, solid waste processing and used oil filter.

A tank farm is located on site consisting of the following tanks:

Tank #1 - 8,225 gallons Water/Antifreeze
Tank #2 - 27,640 gallons Used Oil
Tank #3 - 27,640 gallons Used Oil
Tank #4 - 10,000 gallons Off Specification Fuel
Tank #5 - 27,640 gallons Used Oil
Tank #6 - 10,000 gallons Used Oil
Tank #7 - 8,000 gallons Burner Fuel
Tank #8 - 29,000 gallons Used Oil
Tank #9 - 38,000 gallons Used Oil
Tank #10 - 15,000 gallons Used Oil (heated tank)
Tank #11 - 15,000 gallons Used Oil (heated tank)

Tanks #1 through #11 may change service depending on market conditions. The collected used oil is recovered and processed in the oil processing area. The following are the major feedstock sources:

- Automotive crankcase oil, transmission and rear end oil
- Oil/water emulsions from ships, barges and other sources
- Automotive oils recovered from oil water separators
- Virgin oils and fuels contaminated with water
- Virgin oils recovered from tank cleaning and tank removals
- Used industrial oil
- Old or contaminated fuels

HOWCO has installed the necessary process equipment and maintains other equipment necessary for collection, testing, processing and delivery of the processed oil products.

Solids generated at HOWCO will be sent to permitted facilities for treatment and/or disposal. Copies of the permits for the facilities that receive the solids are maintained on file at HOWCO's central location in St. Petersburg, FL. The solid waste handling will consist of two parts:

- Oily solids batch treatment
- Used oil container storage area

The solids processed by HOWCO are generated onsite as a result of used oil processing and from off-site generators. Soil and solids are mixed together to form a drier and more stable mixture. Solidification agents may be added to enhance the process. Upon approval by a permitted TSD facility, the waste is loaded into trucks and shipped for disposal.

For used oil filters, drums are utilized for collection, shipment and storage. HOWCO may at times consolidate drummed filters into a roll-off or other type container for bulk shipments. Oil filters will be shipped to a scrap metal recycling facility for recovery/reclamation.

HOWCO will also collect off specification fuel for recycling. The off specification fuel will be stored in tanks and the hydrocarbon layer decanted for recovery. Records of the amount of hydrocarbons recovered will be kept. The aqueous portion will be sent to a permitted facility for further treatment as either a nonhazardous waste or a hazardous waste. The off specification fuel will some times have used oil in the petroleum phase. Waste streams removed from the off specification fuel will be shipped to a proper treatment facility for processing.

ATTACHMENT 2

DETAILED PROCESS DESCRIPTION

HOWCO can operate 24 hours per day, seven days per week. Normal working hours for receiving materials are from 7:00 a.m. to 5:00 p.m., Monday through Friday.

1. Oil product pick up

The trucks operate Monday through Friday, and at times on Saturdays and Sundays to collect used motor oil, antifreeze, used oil filters, or off specification fuel from customers/generators. The used oil is initially screened by the driver at pick-up using a halogen leak detector, and, if necessary, tested for total halogens using EPA Method 9077. The generator signs the completed non-hazardous waste manifest. A copy of the non-hazardous waste manifest is provided to the generator and the other copy accompanies the shipment.

2. Truck arrival at HOWCO

When the truck arrives at HOWCO, it is directed to the unloading area. At that point, the incoming shipment is logged and is ready for testing.

3. Oil product testing

The used oil samples are delivered to the laboratory for testing prior to unloading. The oil is tested for total halogens. These tests are performed in the on-site laboratory and stored for one week. The results from the tests will be documented on the Plant Receiving Report. The Plant Receiving Reports are maintained for three years.

4. Oil product unloading

Once acceptance testing is completed, the oil is transferred to the appropriate tank. Should an incoming shipment of used oil initially not meet acceptance criteria for total halogens, and cannot be successfully rebutted the oil is transferred to a designated trailer/container for temporary storage, awaiting additional analysis using EPA Method 8021 or 8260. The trailer/container will be labeled "Hazardous Waste Determination Pending". If the analytical results do not meet the used oil specifications or cannot successfully be rebutted, the oil is shipped to a permitted hazardous waste treatment, storage, and disposal facility.

5. Used Oil Processing

Used oil processing is performed utilizing the Distillation Process or a chemical separation process.

6. Removal and disposal of oily solids

The solids removed during the solids removal screening are processed and disposed of through decanting and solidification. A plant technician or chemist will take the solids samples annually. Each sample will be collected in a glass jar using a scoop. The test results will be used to provide the base information for product knowledge.

7. Processed oil shipment and identification

The operator loads a clean trailer with processed oil. Upon completion, a manifest will be prepared which includes the customer name, address, date, volume and product name.

8. Transportation

Shipments of certified processed used oil are transported to the customer on tank trailers. Upon arrival, the driver unloads the oil on-site into the customer's storage tank.

9. Waste Antifreeze

HOWCO routinely collects waste antifreeze from customers. Antifreeze will be accumulated in a tank and shipped off-site for reclamation at a permitted recycling facility. Records of incoming and outgoing volumes will be documented and maintained at the facility for a period of three (3) years. Tanker trucks, vacuum trucks or flat bed trucks utilizing drums may transport the used antifreeze.

10. Used Oil Filters

Used oil filters will be collected from customers, typically in 55-gallon drums. The drums will be staged inside the storage building and consolidated for shipment to a scrap metal recycler. The filters will be placed in a roll-off container, and excess oil will be collected and removed prior to shipment. The metal from the used oil filters will be recycled by the scrap metal foundry.

11. Off Specification Fuel

HOWCO will also collect off specification fuel for recycling. The off specification fuel will be stored in tanks and the hydrocarbon layer decanted for recovery. Records

of the amount of hydrocarbons recovered will be kept. The aqueous portion will be sent to a permitted facility for further treatment as either a nonhazardous waste or a hazardous waste. The off specification fuel will some times have used oil in the petroleum phase. Waste streams removed from the off specification fuel will be shipped to a proper treatment facility for processing.

ATTACHMENT 3 ANALYSIS PLAN

USED OIL

Used oil, oily wastes and solid waste will be sampled and analyzed by the methods and at the frequency as outlined in the plan.

1. Sampling

Each incoming shipment of used oil received at the facility will be sampled using a bailer or coliwasa. The bailer and/or coliwasa will be inserted to the bottom of the vehicle and pulled out to obtain a representative core sample. Core samples from multi-compartmental trucks will be combined to obtain one sample to be tested. The samples from trucks will be marked with the truck number, date and operator identification number.

2. Testing

The sample will be tested in accordance with FAC 62-710 for total halogens utilizing the following procedure;

- A. A halogen leak detector
- B. If the detector indicates potential high halogen content the EPA method 9077 or 9075 will be utilized.

The Permittee, pursuant to 40 CFR 279.55, shall adhere to the following procedures:

- (a) The Permittee shall sample and test each incoming shipment for total halogens. If the total halogen content is 999 ppm or less, the load will be accepted into the plant.
- (b) If the test results indicate a total halogen content greater than or equal to 1000 ppm, separate samples will be obtained from each compartment. The separate samples will be tested in an attempt to isolate the compartment with excessive levels of total halogens. The test results will be stapled and documented on the receiving report for that vehicle.

Used oil is not received into the plant when the total halogens are greater than 999 ppm or unless total halogens are less than 4000 ppm and one of the following conditions are satisfied:

- 1. Household hazardous waste exemption, 40 CFR 261.4 (b)
- 2. CESQG exemption, 40 CFR 279.10 (b) (3)
- 3. Rebuttable presumption, EPA Method SW-846 / 8021B.

In the event that it is not possible to identify the source of the halogen content, then the oil will be isolated. This will be accomplished by either leaving the oil in the transport vehicle or transferring the used oil to a tank trailer and keeping the tank trailer isolated until the disposition of the material can be determined.

Records of incoming shipments of used oil information will be kept at the Corporate Office for a minimum of three years.

CERTIFICATION OF PROCESSED OIL

Product knowledge and sample analyses are used to determine if the processed oil meets the on-specification criteria.

Outgoing shipments of processed oil shall meet the parameters listed in the classification of on-specification used oil as listed in 40 CFR 279.11. This condition is not required if the outgoing shipment is sold to another used oil processor who will make the on or off specification determination.

A representative sample of each batch of processed oil will be collected after the tank has been aerated for a period of time to be determined by plant operations personnel. The sample is marked with the batch number, tank number and date. The sample is analyzed for:

- Halogen content (sniffer, followed by EPA Method 9077 or 9075 if positive)
- API gravity
- Water content
- Flash Point

To confirm Generator Product Knowledge, once a month a sample will be collected from one of the processed oil tanks and sent off to an independent laboratory for analysis of the constituents listed in 40 CFR 279.11 and Polychlorinated Biphenyls (PCB's). A split sample of the one sent for analysis will be retained for thirty days. The protocol for obtaining the sample will be in accordance with "Samplers and Sampling Procedures for Hazardous Waste" referenced in SW 846. The tank will be secured and no additional oil will be added to invalidate the analysis until the results are known. The results of the analysis will be entered into the company computer system and maintained for three years. The analysis will be reviewed monthly to assure conformance with on-specification used oil limits set forth in CFR 40 Part 279.

INCOMING OILY SOLID WASTES

One of the following methods will be utilized for acceptance criteria for receiving non-hazardous solids:

1. Submittal of a non-hazardous analytical determination from a certified laboratory.

2. Forwarding a sample of the material to HOWCO for a laboratory determination as non-hazardous waste. The sample must be accompanied by a Waste Profile Sheet, noting that the material is not a hazardous waste, as defined in 40 CFR Part 261.
3. Submittal of a signed Waste Material Profile Sheet utilizing generator's process knowledge.
4. Submitting a Waste Material Profile Sheet and MSDS on virgin materials only.

Only one of the aforementioned alternatives is necessary to make a non-hazardous waste determination. Once the determination has been made regarding the acceptance of the material, a manifest number identifying the waste and the generator will be assigned. The waste approval will be valid and acceptable for a period of five years. Copies of the documents are kept on file for a minimum of five years.

The generator will recertify that there has been no change in the waste or the process producing the waste every year. After five years, the waste will be re-sampled and analyzed or generator knowledge will be used to recertify the approval in accordance with the HOWCO Waste Analysis Plan.

ATTACHMENT 4

SOLID WASTE HANDLING

HOWCO recovers and processes a variety of non-hazardous and petroleum contaminated solids, sludges, absorbents and residues.

Removal of oily solids from used oil processing

The oily solids discussed in this section are generated by HOWCO.

Oily solids are removed from used oil at the vibrating mesh screen, tanker trucks and tanks. The oily solids may be placed in drums, roll-off containers or other containers for storage. Oily solids are transferred to the HOWCO - St. Petersburg facility for processing.

Mesh screen - Solids are removed from processed oil by a vibrating mesh screen and collected in drums. Solids are removed from processed oil by a vibrating mesh screen and collected in drums. When a drum is full the solids are removed via vacuum truck. Once separated, the oily solids are mixed with a solidification agent. The solids are loaded into roll off trucks for transportation to a permitted landfill or thermal remediation facility for disposal.

Storage tanks - oily solids removed from storage tanks are pumped and/or vacuumed into a treatment tank, sludge box, vacuum box or drums for transport to the HOWCO – St. Petersburg facility.

A representative sample will be taken annually by a plant technician or chemist. Each sample will be collected in an 8 ounce jar using a scoop. The properly preserved sample will be sent to an outside lab to be analyzed for the full Toxicity Characteristic Leaching Procedure (TCLP) test for metals, volatiles, semi-volatiles, herbicides and pesticides using EPA Test Method 1311 in accordance with SW-846. This analysis will be used to provide the base information for “Generator Product Knowledge”.

Non-hazardous and Petroleum Contaminated Solids From Customers

The company receives a variety of petroleum contaminated solids from customer sources. The petroleum contaminated solids may contain a recoverable amount of oil, however; some solids that are received may be of a consistency that would preclude or be unfeasible to recover any quantifiable amount of oil. Non-hazardous and petroleum contaminated solids consist of absorbents, petroleum contaminated soils and oily sludges. These solids will be received in vacuum trucks and drums and will be transferred to roll off boxes for transport to the HOWCO – St. Petersburg facility for processing.

Receiving and Processing of Oily Solids

Oily solids arriving in drums will be offloaded onto a coated concrete pad prior to processing. The solids from the drums may be bulked in roll-off containers or dump trailer where oil and oily liquids may be removed for recycling or further processing. Solidification agents may be added to these containers prior to off-site shipment to a permitted thermal unit or landfill.

Oily solids arriving in vacuum trucks or other type bulk shipments will be offloaded into other containers. The remaining solids from this process will be gravity fed into a roll-off container or dump trailer for transport to the HOWCO – St. Petersburg facility for processing.

A waste determination in accordance with 40 CFR Part 262.11 will be made once a year on the oily solids removed from the oily solids container.

Solids entering the facility in containers from customers will be recertified annually to attest to the lack of change in consistency and characteristics of the waste and that no process changes have occurred.

Design Requirements

The facility does not have any tipping, processing, sorting, storage or compaction areas that are enclosed. The entire facility is equipped with a fence that is used as a litter control device.

The facility has containment which prevents contaminated stormwater from leaving the property. The facility is designed with secondary containment for the regulated tanks that contain liquids. The regulated tank farm area (with secondary containment) is located on the western-central portion of the facility property. The facility grounds are designed such that there is a slight crown in grade surrounding the tank farm. This slight crown minimizes standing water accumulation and allows non-contaminated stormwater to flow away from the tank farm area. Stormwater coming in contact with processes, chemicals, or equipment is contained and inspected for contaminants before being discharged. Contaminated stormwater is shipped offsite to the HOWCO – St. Petersburg facility for pretreatment and discharge to a permitted Publicly Owned Treatment Facility (POTF). HOWCO – St. Petersburg has a permitted industrial wastewater pretreatment facility onsite. The solid waste that HOWCO processes does not come into contact with stormwater. The solid waste does not generate leachate, since the facility is a Materials Recovery Facility. The facility is appropriately designed to hold the permitted amount of solid waste for processing until the waste is transferred for disposal or recycling. Non-contaminated stormwater is allowed to flow south off of the facility and into a stormwater collection ditch.

Operational Requirements

Recyclable materials are currently managed at the HOWCO facility. The facility does not store non-processable or residue materials. Non-Processable wastes are not received by the facility and have not been received in the past five years. The materials received by the facility are stored, processed and shipped to a permitted treatment, storage or disposal facility. Residues are not received by and are not generated by the facility and are not stored on site.

A trained spotter will be present when waste is being received to inspect the waste streams for unauthorized, non-approved and nonconforming waste streams. The spotter will identify and stop the following waste from entering the facility: hazardous waste, PCB's, asbestos waste, explosives, putrescible, toxic waste, biohazardous waste, non-approved, and nonconforming waste streams. The spotter duties will be completed in the receiving area where the waste containers are opened up for incoming inspection.

Unauthorized wastes, non-approved and nonconforming waste streams will be placed in a proper D.O.T. shipping container. The containers will be placed in a portable secondary containment unit, which will be located near the eastern end of the facility property. The unauthorized waste will be marked "UNAUTHORIZED WASTE" and will be wrapped with yellow caution tape. The unauthorized waste will be shipped to a properly permitted treatment, storage or disposal facility. The unauthorized waste will be shipped off site as soon as it can be scheduled and when it is economically feasibly possible. The waste generator and the Florida Department of Environmental Protection will be notified of the unauthorized waste.

The operation hours of the facility will be clearly posted where they are visible. The spotter will be trained in accordance with F.A.C. 62-701.320(15). The spotter will be present when the facility is open to receive solid waste.

Financial Assurance

The required financial assurance is provided as enclosure (1).

Stormwater

Stormwater coming in contact with used oil or solid waste processing areas including the tank farm, the associated secondary containment, sludge press and the chemical storage area is visually inspected before it is allowed to flow off site. If any visible contamination is present, the stormwater is contained and shipped offsite to the HOWCO-St. Petersburg facility where it is treated in the onsite permitted Industrial Wastewater Pretreatment Facility before discharge to a POTF. Non contaminated stormwater that is allowed to flow offsite flows south to a stormwater drainage ditch.

The Astor facility was granted No Exposure Certification for Exclusion from NPDES Stormwater Permitting status on May 25, 2010 by the Florida Department of Environmental Management (FDEP). A copy of the approval letter is provided as enclosure (2).

Record Keeping

HOWCO shall maintain operational records on-site to include a daily log of the quantity of solid waste received, processed, stored and removed from the site for recycling or disposal. The country of origin for the waste will be recorded, if known. These records shall include each type of solid waste, recovered materials, residuals and unacceptable waste which is processed, recycled and disposed. Such records shall be compiled on a monthly basis and shall be available for inspection by the Department. Records shall be retained at the facility for at least three years. No construction or demolition debris is accepted at the facility.

Enforcement History

A data base compliance search was done on the FDEP website and no solid waste enforcement actions were found going back as far as records were available. The first inspection obtained by the data base search was in 1999 and there was no violations noted.



Florida Department of Environmental Protection

Bob Marriner Center
2600 Blair Stone Road MS 1565
Tallahassee, Florida 32399-2100

February 10, 2010

Mr. Richard Dillen
Hagan Holding Company
3701 Central Avenue
St. Petersburg, FL 33713

Re: FL D101828689 - Howco Environmental Services (Astor)

Dear Mr. Dillen:

I reviewed the financial assurance file for the above referenced facility and find it is in order. Bank of America N.A. letter of credit number 68014738, adequately covers the Department approved closing cost estimate of \$24,228.06 dated February 18, 2010. Therefore, Howco Environmental Services (Astor) facility is in compliance with the financial assurance requirements of 40 CFR Part 264, Subpart H as adopted by reference in Rule 62-701.630 Florida Administrative Code, at this time.

If you have any questions, please contact me at (850) 245-8745

Sincerely,

Frank Hornbrook
Environmental Specialist
Solid Waste Section

cc: Fred Wick, DEP/TLH
Bheem Kothur, DEP/TLH

ENCLOSURE (1)



Environmental Services
RESOURCE RECOVERY & WASTE MANAGEMENT

February 18, 2010

Used Oil Permit Coordinator

813-4560

Florida Department of Environmental Protection

2600 Blair Stone Road

Tallahassee, FL 32399-2400

RE: Closing cost estimate updates

To whom it may concern:

Enclosed please find the updated Used Oil Processing Facility Closing Cost Estimate Forms and copies of both Irrevocable Letters of Credit for the following locations:

1) HOWCO Environmental Services
843 43rd Street South, St. Petersburg, FL 33711

2) HOWCO Environmental Services
24133 State Road 40, Astor, FL 32102

If you have any questions or need additional information, please call me at tel. (727)-437-4059.

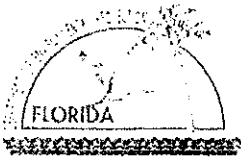
Sincerely,



Richard Dillen

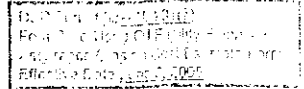
Quality Assurance Officer

Cc: File



Florida Department of Environmental Protection

Twin Towers Office Bldg. • 2600 Blair Stone Road • Tallahassee, Florida 32399-2400



Used Oil Processing Facility Closing Cost Estimate Form

Date: February 18, 2010 Date of DEP Approval: _____

I. GENERAL INFORMATION: Latitude: 29°09'46"N Longitude: 81°32'26"W EPA ID Number: FLD 101 808 089

Facility Name: Hagan Holding Company, d/b/a HOWCO Environmental Services Permit Number: 27-251-FC-003

Facility Address: 24133 State Road 40, Astor, FL 32102

Mailing Address: 3701 Central Avenue, St. Petersburg, FL 33713

Contact Person's Name: Richard Dillen Phone Number: (927) 437-4059

E-mail: RDILLEN@HOWCOUSA.COM Fax Number: (927) 598-7782

II. TYPE OF FINANCIAL ASSURANCE DOCUMENT (Check Type)

- Letter of Credit
- Performance Bond
- Surety Bond
- Certificate of Insurance
- Insurance Certificate
- Financial Test
- Trust Fund Agreement
- Other (specify type of bond or trust fund agreement)

III. ESTIMATE ADJUSTMENT: (check and use either box a or b below)

40 CFR Part 264 Subpart H, as adopted by reference in Rule 62-701.630, Florida Administrative Code, sets forth a method of annual cost estimate adjustment. Cost estimates may be adjusted by using an inflation factor or by recalculating the maximum costs of closing in current dollars. Estimates are due annually between January 1 and March 1. Select one of the methods of cost estimate adjustment below.

(a) Inflation Factor Adjustment

Inflation adjustment using an inflation factor may only be made when a Department approved closing cost estimate exists and no changes have occurred in the facility operation which would necessitate modification to the closure plan. The inflation factor is derived from the most recent Implicit Price Deflator for Gross National Product published by the U.S. Department of Commerce in its survey of Current Business. The inflation factor is the result of dividing the latest published annual Deflator by the Deflator for the previous year. The inflation factor may also be obtained from the Solid Waste Financial Coordinator at (850) 245-8732 or be found online at <http://www.doh.state.fl.us/oc/oc.htm>.

This adjustment is based on the Department approved closing cost estimate dated: February 10, 2009

\$ 23,753.00	x	1.020	=	\$ 24,228.06
Latest DEP approved Closing Cost Estimate		Current Year Inflation Factor		Inflation Adjusted Annual Closing Cost Estimate

Signature: [Signature] Phone: (927) 437-4059

Name and Title: Richard Dillen, Quality Assurance Officer E-Mail: RDILLEN@HOWCOUSA.COM

If you have questions concerning this form, please contact the Used Oil Coordinator at the address below, by phone at (850) 245-8755, or by E-Mail at richard.neves@dep.state.fl.us

Please mail this completed cost estimate to: *Please mail a copy of the cost estimate to:*

Used Oil Permit Coordinator
MS4560
FDEP
2600 Blair Stone Road
Tallahassee, FL 32399-2400

Solid Waste Financial Coordinator
MS 4565
FDEP
2600 Blair Stone Road
Tallahassee, FL 32399-2400



Environmental Services
RESOURCE RECOVERY & RESTORATION

February 18, 2010

Solid Waste Financial Coordinator
MS 4565
Florida Department of Environmental Protection
2600 Blair Stone Road
Tallahassee, FL 32399-2400

RE: Closing cost estimate updates

To whom it may concern:

Enclosed please find copies of the updated Used Oil Processing Facility Closing Cost Estimate Forms for the following locations:

- 1) HOWCO Environmental Services
843 43rd Street South, St. Petersburg, FL 33711
- 2) HOWCO Environmental Services
24137 State Road 40, Astor, FL 32102

In addition, I have also included copies of Letter of Credit No's 296-01 and 62014738 for the St. Petersburg and Astor facilities, respectively.

Our records show that Synovus Bank forwarded the latest original amended Irrevocable Letter of Credit No. 296-01 for the amount of \$ 105,000.00 to the Department as can be seen from the following e-mail excerpt:

From: JODY DAVIES [mailto:JoayDavies@synovusbankfl.com]

Sent: Wednesday, February 17, 2010 10:52 AM

To: Thelma Mendenhall

Subject: RE: Help

The original Letter of Credit Amendment was mailed to the beneficiary (certified with return receipt requested) in today's mail run. When I get the green card back, I will let you know. Then you will know the beneficiary has what they asked for.

If you have any questions or need additional information, please call me at tel. (727)-437-4059.

Sincerely,



Richard Dillen
Quality Assurance Officer
Cc: File



Environmental Services
RESOURCE RECOVERY & MANAGEMENT

February 18, 2010

Mr. Brian Bizzelli
Najem Trust Company
4890 West Kennedy Boulevard
Tampa, FL 33609-1881

RF Irrevocable Letter of Credit No. 296-01

Mr. Bizzell,

Enclosed please find a copy of the latest amendment of the above mentioned Letter of Credit.

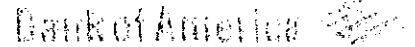
If you have any questions or need additional information, please call me at tel. (727)-327-4050

Sincerely,



Richard Dillen
Quality Assurance Officer

Cc: File



BANK OF AMERICA - COMMERCIAL

PAGE: 1

DATE: APRIL 11, 2007

AMENDMENT TO TRAVELERS STANLEY LETTER OF CREDIT NUMBER 51000100

AMENDMENT NUMBER 1

ISSUING BANK
BANK OF AMERICA, N.A.
1 STREET WEST
PO BOX 1700
RICHMOND, VA 23210-1000

BENEFICIARY
FLORIDA DEPT OF ENVIRONMENTAL
PROTECTION, DIRECTOR, DIVISION OF
WASTE MANAGEMENT

APPLICANT
EAGAN HOTELS GROUP
3701 CENTRAL AVE
ST. PETERSBURG, FL 33713

EVEN TOWERS OFFICE BUILDING
2600 BLAIR STONE RD MS 4545
TALLAHASSEE, FL 32399-2400

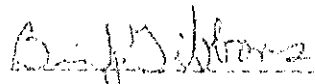
THIS AMENDMENT IS TO BE CONSIDERED AN INTEGRAL PART OF THE ABOVE CREDIT AND MUST BE ATTACHED THERETO.

THE ABOVE MENTIONED CREDIT IS AMENDED AS FOLLOWS:

THE AMOUNT OF THIS CREDIT HAS BEEN INCREASED BY USD 6,000.00
THE AGGREGATE AMOUNT OF THE CREDIT IS NOW USD 24,500.00

ALL OTHER TERMS AND CONDITIONS REMAIN UNCHANGED.

IF YOU REQUIRE ANY ASSISTANCE OR HAVE ANY QUESTIONS REGARDING THIS AMENDMENT, PLEASE CALL 800-375-7619.



AUTHORIZED SIGNATURE

THIS DOCUMENT CONSISTS OF 1 PAGE(S)

ORIGINAL



Florida Department of Environmental Protection

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

Charlie Crist
Governor

Jeff Kottkamp
Lt. Governor

Michael W. Sole
Secretary

May 27, 2010

Timothy Hagan
HOWCO Environmental Services
3701 Central Ave.
St. Petersburg, FL 33713

RE: **Facility ID: FLRNEE846**
HOWCO Environmental Services - Astor
County: Lake

Dear Applicant:

The Florida Department of Environmental Protection has received and processed your *No Exposure Certification for Exclusion from NPDES Stormwater Permitting* (No Exposure Certification) and the accompanying processing fee. This letter acknowledges that:

- your No Exposure Certification is complete;
- your processing fee is paid-in-full;
- you are excluded from having to obtain a National Pollutant Discharge Elimination System (NPDES) stormwater discharge permit for the next five years; and
- your exclusion is subject to the conditions and limitations in Rule 62-620.100(2)(o) of the Florida Administrative Code.

The No Exposure Certification is your certified affirmation that stormwater discharged by your facility does not come into contact with industrial materials or activities.

Your facility identification number is **FLRNEE846**. Please include this number on all future correspondence to the Department regarding this permit.

The No Exposure Certification is valid for five years with coverage commencing **April 23, 2010** and terminating **April 22, 2015**. To renew your certification for another five-year period, you must submit a new No Exposure Certification form and processing fee to the Department. To assure continuous coverage, it is recommended that the new certification and fee be submitted at least 30 days prior to the expiration date.

May 27, 2010

If stormwater becomes exposed to your industrial materials or activities at any time, your exclusion will no longer be effective and you will be subject to enforcement for discharging stormwater without a permit. If you anticipate the condition of no exposure will change, you should immediately (1) terminate your exclusion by filing a *National Pollutant Discharge Elimination System (NPDES) Stormwater Notice of Termination*, DEP Document No. 62-621.300(6) and (2) obtain permit coverage to discharge stormwater associated with industrial activity.

If your facility discharges stormwater through a municipal separate storm sewer system (MS4), be sure to submit a copy of your certification to the MS4 operator as required by Rule 62-620.100(2)(o)1 of the Florida Administrative Code. For the duration of your exclusion, your facility is subject to inspection by the Department, its authorized agents, and the operator of the MS4 into which you discharge (if applicable).

If you have any questions concerning this acknowledgment letter, please contact the NPDES Stormwater Notices Center at (866) 336-6312 or (850) 297-1232.

CERTIFICATE OF SERVICE

THE UNDERSIGNED HEREBY CERTIFIES that the foregoing acknowledgment of coverage under the No Exposure Exclusion from NPDES Stormwater Permitting, Rule 62-620.100(2)(o), F.A.C., was mailed by Science Applications International Corporation working under FDEP Contract Number WM908, on behalf of the Florida Department of Environmental Protection, on the date indicated below via the United States Postal Service.

Name: Robin L. Collins Date: 5/27/2010

ATTACHMENT 6

EMERGENCY PREPAREDNESS, PREVENTION & CONTINGENCY PLAN

Table of Contents

- 1.0 Introduction
- 2.0 General Information
- 3.0 Spill Prevention & Emergency Preparedness
- 4.0 Emergency Coordinator Information
- 5.0 Arrangements with Local Authorities
- 6.0 Emergency Procedures
- 7.0 Decontamination
- 8.0 Reporting & Record keeping
- 9.0 Tank Closure
- 10.0 Amendments

1.0 INTRODUCTION

1.1 Purpose

The goal of this emergency plan is to minimize hazards to human health and the environment from fires, explosions, or any unplanned sudden or non-sudden releases to soil, or surface water. The provisions of this plan will be carried out whenever there is a fire, explosion, or release of oil, which could threaten human health or the environment. A copy of this plan and any revisions will be maintained at the facility and submitted to local police, fire department and hospital, that might be called upon to provide emergency services. Postal receipts verifying delivery of the plans will be kept by HOWCO. In the event a local agency refuses to acknowledge the plan, HOWCO will notify the Department.

1.2 Areas of Concern:

- Transportation of recyclable materials to storage and unloading areas
- Transportation and unloading of used oil
- Tank storage area
- Solid waste handling and solidification – bulk and drums

1.3 Responsibilities

The Primary Incident Coordinator (PIC) must be familiar with this Plan, operations and activities at the facility, including the location and characteristics of used oil, the location of records, and the facility layout. The PIC or his/her designee is responsible for modifying this plan, as needed, to reflect changes in facility operations and/or county, state, or federal regulations. The PIC is responsible for ensuring that Howco employees are familiar with the content of this plan and are able to implement it, if needed and responsible for ensuring that this plan is posted and accessible to Howco employees. The PIC is responsible for implementing the plan in the event of an emergency and/or accidental release of material/waste. In the absence of the PIC, the Secondary Incident Coordinator (SIC) will be responsible for implementation.

After each emergency, this plan shall be reviewed and revised as necessary in the event of the plan's failure, the lack of pertinent information within the plan or any other identified problem associated with the plan.

2.0 GENERAL INFORMATION

Facility Name: HOWCO
Location: 24133 State Road 40, Astor, Florida 32102

Telephone No.: (727) 327-8467 (352) 759-2111 FAX

Facility Activities: The facility is a used oil processing facility that can operate 24 hours per day, 7 days per week. Used oil, oil filters, antifreeze and petroleum contaminated water are collected from various clients. The materials are delivered to the facility and tested. Based on the test results, the materials are transferred into holding tanks, processed, and then shipped to suppliers and/or disposal/recycling facilities.

3.0 SPILL PREVENTION and EMERGENCY PREPAREDNESS

Prevention of spills is accomplished through careful handling of used oil and used oily materials and products, frequent inspection of transport and storage systems and strict adherence to safety procedures during material transfers. The operations are reviewed in terms of existing procedures and spill potential

General Spill Prevention Measures

- Employees handling containers are responsible for inspecting damaged containers and seals during handling, reporting any damages found and removing damaged containers from further use.
- Employees must properly stack the drums and other containers

Material Transport and Transfer

- Drivers are responsible for the guarding against overfilling tanks and containers.
- Pumps must be attended while in operation.
- Pumps, pipes, hoses, gaskets, and connections are inspected for wear by the responsible supervisor.
- Waste is to be placed in appropriate approved containers.

Prevention and Protective Measures

- Proper and safe work behavior practices
- Provision and use of proper equipment and facilities
- Continual assessment of potential hazards
- Provision and use of proper Personal Protective Equipment (PPE)
- Effective training
- Communication

Emergency Equipment Available (see site plan for locations)

Training

Training is the responsibility of the Department Manager (DM). The DM will ensure that personnel receive training commensurate with their designated duties and responsibilities.

Standard Operating Procedures (SOP) and regulatory requirements will be the basis for training and will vary depending on the job description of the employee.

- Operations Personnel
 - o Emergency Response Procedures
 - o PPE use
 - o Containment procedures
 - o Record keeping and reporting policies
 - o Operating & Inspection procedures
 - o Loading and unloading procedures
 - o Acceptance and processing procedures

Spill Abatement Activities

- Incidental Spill – The spill from any tank, pump or leaking pipe or hose will be contained by the existing containment and controlled without causing any damage to the environment.
- Major Spill – The spill from the containment in the plant area will flow in a direction away from the plant, toward the stormwater drainage ditch to the south of the facility property. In such a case, immediate action will be taken to reinforce damaged parts of the containment areas and to minimize further release. Remediation and clean-up will begin as soon as feasibly possible.

The Plant Manager and/or the PIC are responsible to order necessary steps for implementation of these instructions using the following guidelines:

- Do not risk human life or health in an attempt to control a spill
- Shut off pumps and close the lines serving a leaking container or tank
- Shut off electricity to the affected area, if necessary
- Mobilize emergency response personnel
 - o Normal working hours – the plan will be activated by use of an electronic loudspeaker
 - o Off-shift hours – control team personnel will be notified by telephone or pager
- Contain the spill as close to its source as possible
- Assemble required clean-up equipment and order clean-up
- In addition to the PIC, operating personnel will, under the direction of the PIC, position the absorbent materials in strategic points to contain the spill as needed.
- Response team members will operate pumps and man hoses to further contain and capture the spill
- Team members will perform other assigned tasks needed as directed by the PIC

4.0 EMERGENCY COORDINATOR (PIC) INFORMATION

Duties of the Emergency Coordinator or Designee

- Respond to any emergencies that may arise. Use established response protocols and personal protective equipment as needed. Summon aid as necessary. Evacuate as required.
- In case of FIRE, summon the Fire Department and the Police immediately by activating the alarm system and by dialing 911. If there are injuries Emergency Management Services (EMS) can also be contacted by dialing 911.
- In the event of a spill, release or discharge, contain the flow of hazardous materials to the extent possible. Spills to the city sewer must be reported to the Utility Department. Spills must also be reported to the State Warning Point (850) 320-0519 or (800) 413-9911, and/or the National Response Center (800) 424-8802 if above the reportable quantity. Check SARA Title III.
- Clean up the waste and any contaminated materials or soil as soon as it is practical.
- If the incident i.e. fire, explosion, or other release, could threaten human health outside the facility or HOWCO has knowledge that a spill has reached surface water, notify the National Response Center Immediately at (800) 424-8802.

The following identifies the primary and alternate emergency coordinators:

Recycling Facility Primary Emergency Coordinator (Primary PIC)

Dan Medici

Work Phone # 727-437-4056

Cell Phone # 727-385-1508

If the Primary PIC is unavailable, contact the Secondary PIC.

Recycling Facility Secondary Emergency Coordinator (Secondary PIC)

Lee Morris

Work Phone # 727-327-8467

Cell Phone # 727-543-5429

Or

Tim Hagan

Cell Phone # 727-804-4446

There will be at least one PIC either at the facility or on call who is available to respond to an emergency by reaching the facility within a short period of time and has the responsibility for coordinating the emergency response measures. The PIC will be familiar with the aspects of this plan, operations and activities of the facility, the location and characteristics of the materials handled, the location of records within the facility, and the general facility layout. Additionally, PICs have the authority to commit resources needed to carry out this plan.

5.0 ARRANGEMENTS WITH LOCAL AUTHORITIES

Arrangements with authorities are established by providing appropriate agencies with a copy of the plan and a letter requesting their assistance in the event of an emergency. In

the event revisions to this plan are made, a revised copy will be submitted to the referenced agencies. In the event any unplanned, sudden or non-sudden release of oil to the environment, the provisions of this plan must be carried out by the PIC. The PIC will determine if the emergency requires assistance from Federal, State or Local agencies. If agency assistance is needed, the PIC or Designee/First Responder shall notify the agency with the following information:

1. Time and type of emergency
2. Location
3. Name and quantity of material(s) involvement
4. Type of service needed
5. The possible hazards to human health or the environment

The following items will be completed by the PIC:

1. Provide a site layout, description of oil properties and associated hazards (MSDS), and appropriate emergency and evacuation plans
2. Consult with emergency response teams to determine if agreements between the primary and supporting personnel are necessary
3. Document agreements/refusals

The following agencies are requested to the provide assistance as described below:

6.0 EMERGENCY PROCEDURES

6.1 Identifying Releases and Hazards

Whenever there is a release, fire, or explosion, the PIC or First Responder will immediately dial 911. The PIC or First Responder will then attempt identify the character, exact source, amount, and a real extent of any released material/waste. The PIC or First Responder will do this by observation or review of facility records/manifests and, if necessary by chemical analyses.

Concurrently, the PIC or First Responder will assess possible hazards to human health and the environment that may result from a release, fire, or explosion. The assessment will consider both direct and indirect effects of a release, fire, or explosion such as possible toxic gases, or the effect of any hazardous surface water runoff from water or fire depressing agents used to control the situation.

6.2 Notifications and Reporting

In the event of an imminent or actual emergency, the PIC or First Responder will immediately dial 911. The facility communication system includes a telephone, cellular phones, and an electronic loudspeaker. 40 CFR Table 302.3 will be consulted when any hazardous materials are spilled. If the hazard material that was released meets or exceeds the Reportable Quantity (RQ), the agencies below will be notified immediately:

- 1) Florida Department of Environmental Protection via (813) 632-7600 (within 24 hours)
- 2) State Warning Point via (800) 413-9911 or (850) 320-0519 (within 24 Hours)

Notification of additional local authorities listed in Appendix B may be conducted, as deemed necessary by the PIC or First Responder.

If the PIC or First Responder determines that the facility has had a release, fire, or explosion, which could threaten human health or the environment outside the facility boundaries, the PIC or First Responder will report the findings as follows:

- 1) If the PIC or First Responder's assessment indicates that evacuation of the local area may be advisable, the PIC or First Responder will immediately notify the local authorities identified above. Additional assistance from local authorities listed in Appendix B may be obtained, as deemed necessary by the PIC or First Responder. The PIC or First Responder will notify employees by use of a bull horn. The PIC or First Responder will be available to assist local authorities in deciding whether evacuation of the immediate area is needed.
- 2) The PIC or First Responder will report the following information:
 - a) Name and telephone number;
 - b) Name and address of facility;
 - c) Time and type of incident;
 - d) Name and quantity of material involved, to the extent known;
 - e) The possible hazards to human health and the environment.

6.3 Emergency Procedures

During an emergency, the PIC or First Responder will take reasonable measures necessary to ensure that fires, explosions, and releases do not occur, reoccur, or spread to other hazardous material/waste at the facility. These measures may include stopping operation, collecting and containing released material, and removing or isolating containers. If the facility stops operating, the PIC or First Responder will monitor for leaks, pressure build-up or breaches in valves, pipes, containment, etc.

After an emergency, the PIC or First Responder will provide for treatment, storage and disposal of recovered material/waste including contaminated soil, water or other material. The treatment, storage, disposal of recoverable material/waste will be conducted in accordance with applicable county, state and federal regulations. Waste management companies utilized in the treatment, storage and disposal of recovered material will be chosen at the PIC or First Responder's discretion. The PIC or First Responder will ensure that, in the affected area(s) of the facility, no material/waste is incompatible with the released material/waste until cleanup procedures are completed. The emergency

equipment will be cleaned, if necessary, and fit for its intended use before operations are resumed.

Emergency Communication System

There are several telephones located within the office and laboratory areas. Pagers and cellular phones are issued to the PIC and operating personnel. Visual and voice warnings will be used to notify on-site personnel of an emergency during working hours. During non-working hours, telephones and pagers are used to contact the PIC and members of the Emergency Response Team.

Fire Control Systems

- Dry chemical fire extinguishers in the tank farm area
- Dry chemical fire extinguishers in the garage area
- Dry chemical fire extinguishers in the laboratory area
- Dry chemical fire extinguisher in the main office area

Site Control Systems

- The oil storage areas are surrounded with containment systems
- Oil containment and cleanup materials include:
 - o Oil dry
 - o Dike plugs
 - o Booms and absorbent pads
 - o Aggregate material for containment
- Decontamination equipment includes:
 - o Surfactant and water
 - o Brushes, buckets and mops

Maintenance and Testing

1. Site and fire control equipment will be inspected quarterly
2. Fire extinguishers will be inspected annually.

Equipment Handling Procedures

1. Containers and equipment will be stored such that sufficient aisle spacing is maintained to facilitate emergency response equipment
2. Facility operations personnel will have access to communication devices.

Removal of Oil/Water from Containment

To remove oil or water from the containment, the following steps will be followed:

1. Accumulated water is inspected for the presence of a sheen.
2. If a sheen is present, the water is considered to be contaminated and will be transferred into a storage tank.
3. The water is not considered contaminated; it may be discharged to grade.

4. The following records must be maintained for each discharge event:
 - a. Date
 - b. Time
 - c. Presence or absence of petroleum or sheen
 - d. Person removing the accumulation

Off-site Emergency Response Procedures - during transport

1. Driver assesses the situation.
2. Driver will contact the PIC using the telephone numbers provided in this plan.
3. If the emergency warrants an immediate response by outside agencies, the driver will contact the appropriate agency using the telephone numbers provided in this plan.
4. Driver will set up absorbent material in front of any sewer drains and/or grassy areas to prevent oil from spreading to those areas.
5. Driver will remedy the release utilizing the spill containment procedures defined in this plan.
6. Driver will document the incident as noted in this plan.

7.0 DECONTAMINATION

Equipment used in the emergency response action will be decontaminated with an appropriate compatible cleaning solution before the articles leave the work area. Oil contaminated equipment should be cleaned using a surfactant and water solution. Refer to the manufacturers equipment guide for further details.

The PIC is responsible for assuring that the above-mentioned decontamination procedures are performed. Damaged tanks, pipes, drums, etc. will be repaired or replaced with equivalent equipment that meet or exceed the original design specifications, when applicable.

8.0 REPORTING

If this plan has been enacted, the PIC will submit a written report to the applicable Federal, State and Local agencies within 15 days of the incident. The report shall contain the following information:

1. Name, address, and telephone number of the owner/operator
2. Name, address, and telephone number of the facility
3. Date, time and type of incident
4. Name and quantity of material(s) involved
5. The extent of injuries, if any
6. An assessment of actual or potential harm to human health or the environment
7. Estimated quantity and disposition of the recovered material from the incident

The PIC will notify the Department when the facility has returned to compliance and prior to resuming operations.

9.0 TANK CLOSURE PLAN

Aboveground storage tanks (ASTs) will be closed in accordance with AST System Closure Requirements in Chapter 62-761.800, F.A.C.

10.0 AMENDMENTS to CONTINGENCY PLAN

This plan will be revised, if necessary, whenever:

1. Applicable regulations or ordinances are revised;
2. The plan fails in an emergency;
3. The facility changes in a manner that materially increases the potential for fires, explosions, or the release of hazardous materials/waste, or changes the response necessary in an emergency;
4. The PICs change; or
5. The list of emergency equipment changes.

PHONE NUMBERS OF LOCAL AUTHORITIES AND AGENCIES

<u>Local Authority/Agency Period</u>	<u>Phone Number</u>	<u>Contact</u>
Any Emergency	911	
FL. Department of Environmental Protection		
Tallahassee (24 hour line)	800-320-0519	
Southwest District	813-632-7600	
National Response Center	800-424-8802	
CHEMTREC (Chemical Information)	800-424-9300	
Division of Emergency Response	800-635-7179	
Department of Community Affairs (DCA)	800-320-0519	
Pinellas County Emergency Management	727-464-3800	
Florida Marine Patrol	800-342-5367	
Coast Guard	727-896-6187	
St Petersburg Fire Department	727-893-7272	
Department of Transportation	813-632-6859	
FL. Highway Patrol	813-632-6859	
OSHA	813-626-1177	
Department of Environmental Management		
Division of Air Quality	727-464-4422	
Bayfront Medical Center	727-893-6714	
Bayfront Convenient Care	727-526-3627	
Edward White Hospital	727-323-1111	
Convenient Care (Company Doctor)	727-347-9719	

ATTACHMENT 7 UNIT MANAGEMENT DESCRIPTION

Drums

The drums will be handled and unloaded in a dedicated drum area. The area is constructed of reinforced concrete. Proper aisle space will be maintained for containers. There will be space between pallet/drum rows with the minimum clearance of two feet between rows. HOWCO will inspect the drums on a weekly basis and inspection logs will be completed and maintained on-site.

Piping

Piping systems consist of steel pipes with welded joints. Most tanks are connected by three and two-inch piping. Used oil storage tanks are connected by three-inch carbon steel, iron or PVC pipes.

Storage Tanks

Above ground storage tanks currently meet the requirements of Rules 62-762.511.

Storage tanks, process tanks and process equipment are periodically inspected in accordance with Rule 62-762.601. The inspection records maintained on-site. Tanks are labeled according to their contents.

Removal of oil/water from containment

1. Accumulated water is inspected for the presence of a sheen or petroleum odor.
2. If a sheen or odor is present, the water is considered to be contaminated with petroleum and will be transferred to a used oil storage tank.
3. The water is not considered to be contaminated and may be disposed of to grade as storm water if a sheen or odor is not present. The discharge grade will be conducted in accordance with the facility Spill Prevention, Control and Countermeasures (SPCC) Plan under 40 CFR Part 112.
4. Records consisting of the date, time, presence or absence of sheen or odor, and person removing the accumulation are maintained for each discharge event.