

Thursby, Kim

From: Kothur, Bheem
Sent: Tuesday, October 26, 2010 10:22 AM
To: Tripp, Anthony
Cc: Thursby, Kim
Subject: Emailing: DOC082710_(2)[1].doc
Attachments: DOC082710_(2)[1].doc

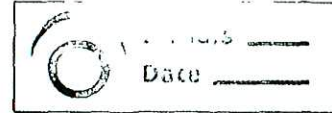
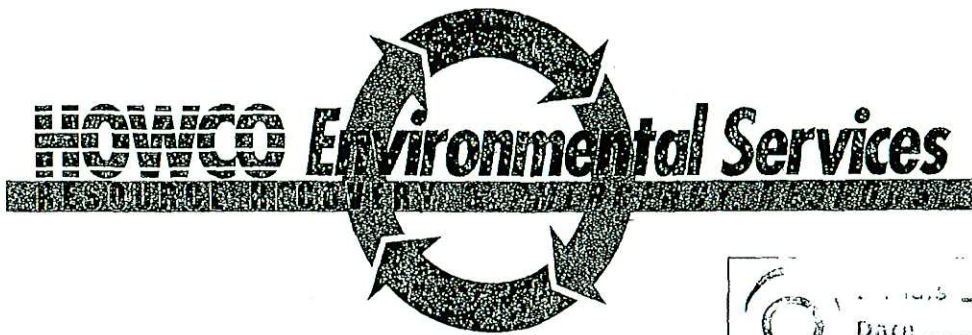
Tony,
FYI and request of NOD comments letter dated July 27, 2010, acknowledgement from the facility.

Bheem

The message is ready to be sent with the following file or link attachments:

DOC082710_(2)[1].doc

Note: To protect against computer viruses, e-mail programs may prevent sending or receiving certain types of file attachments. Check your e-mail security settings to determine how attachments are handled.



August 11, 2010

Florida Department of Environmental Protection
Hazardous Waste Regulation
Attn Mr Bheem Kothur, P E
2600 Blau Stone Road
Tallahassee, Florida 32399-2400

Received

AUG 17 2010

BSHW

RE HOWCO Environmental Services
St Petersburg Used Oil Facility
EPA ID No FLD 152 764 767
Permit Number 33721-HO-002
Used Oil Processing Facility Permit Renewal
FDEP Response Letter Dated July 12, 2010

Dear Mr Kothur,

This letter is in response to the Florida Department of Environmental Protection (FDEP) comment letter dated July 12, 2010, concerning the Used Oil Permit Renewal for the HOWCO Environmental Services - St Petersburg Facility

The enclosed response to the items in the comment letter have been addressed and changes to the Permit Renewal Application have been completed by Environeering, Incorporated

If you have any questions or comments, I can be reached at (727) 327-8467

Sincerely,

Tim Hagan
President and CEO
HOWCO Environmental Services

<COMMENT LETTER FDEP-3947-1-A>

RECEIVED
RCRA
AUG 17 2010
Hazardous Waste Regulation



August 17, 2010

Mr. Bheem Kothur, P.E. III
Florida Department of Environmental Protection
Hazardous Waste Regulation
Bob Martinez Center
2600 Blair Stone Road
Tallahassee, Florida 32399-2400

Received
AUG 23 2010
BSHW

Subject : Extension for Response to Comments to FDEP Letter Dated July 27, 2010

RE: HOWCO Environmental Services
Astor Facility
EPA I.D. No. FLD 101 828 689
Permit Numbers: 27221-HO-004; 27221-SO-005
USED Oil Processing Permit Renewal

RECEIVED
RCRA

AUG 24 2010

Dear Mr. Kothur:

Hazardous Waste Regulation

HOWCO Environmental Services respectfully requests an extension for the Response to Comments to the letter from the FDEP dated July 27, 2010. The FDEP letter addresses several items associated with the solid waste and used oil permit renewal for the above referenced facility. Environeering, Incorporated will be preparing the response letter.

Schedule: The required items and the general comments in the FDEP letter dated July 27, 2010 will be addressed and submitted in a Response to Comments letter on September 3, 2010. The required revisions to the permit application will be included in the submittal.

If you have any questions, please contact our environmental engineer, Mr. Timothy Rudolph, P.E. at (904) 665-0100 (office) or (904) 612-1456 (mobile) or myself at (727) 327-8467.

Sincerely,

Tim Hagan
President and CEO

HOWCO Environmental Services

3701 Central Avenue - St. Petersburg, FL 33713 - Tel. 727-327-8467 Fax: 727-321-6213

Operations: Tampa Bay - Astor - Ft. Myers - 24-Hour Emergency Access 1-800-435-8467



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

July 12, 2010

SENT VIA E-MAIL

thagan@howcousa.com

Mr. Tim Hagan, President & CEO
Howco Environmental Services- St. Petersburg
3701 Central Avenue
St. Petersburg, FL 33713

RE: Howco Environmental Services
EPA I.D. No. FLD 152 764 767
Permit Number: 33721-HO-002
Used Oil Processing Facility Permit Renewal
Notice of Deficiency - 1

Dear Mr. Hagan:

The Florida Department of Environmental Protection (the Department) has received your permit renewal application dated May 28, 2010 and received on June 8, 2010 and reviewed to operate a Used Oil Processing facility at 3701 Central Avenue, St. Petersburg, Florida, 33713.

The review of the permit renewal application NOD Comments indicates that it is incomplete. Please provide the information requested in the enclosed Attachment. In preparing your response, the Department recommends that you identify each comment followed by your response and also provide your revised pages of the application. The revised pages are to include the new revision date.

Further action on processing your application is temporarily held in abeyance pending receipt of your complete response. Please submit three copies of your written response (two copies to the Tallahassee Solid and Hazardous Waste Regulation Section, and one to the Southwest District office). If you cannot submit all this information within 30 days, you must formally request an extension and provide a schedule, with dates, indicating when this information will be submitted.

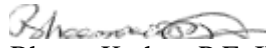
Mr. Tim Hagan, President & CEO

July 12, 2010

Page Two

Should you like to arrange a meeting or if you have any questions, please contact Bheem Kothur at (850) 245-8781, e-mail: kothur@dep.state.fl.us

Sincerely,



Bheem Kothur, P.E. III
Hazardous Waste Regulation

BK/bk

Enclosure: Attachment

cc: Jim Dregne, DEP/South West District, james.dregne@dep.state.fl.us
Tim Rudolph, Environeering, Inc./Ponte Verda, timenvironeering@bellsouth.net
Fred Wick, DEP/Tallahassee, fred.wick@dep.state.fl.us
Georgiana, Holmes, OGC/Tallahassee, Georgiana.holmes@dep.state.fl.us
Frank Hornbrook, DEP/Tallahassee, frank.hornbrook@dep.state.fl.us
Lee Martin, DEP/Tallahassee, lee.martin@dep.state.fl.us
Richard Dillen, Howco Environmental Services/St. Petersburg, rdillen@howcousa.com

ATTACHMENT
July 12, 2010
Howco Environmental Services
St. Petersburg, Florida
EPA I.D Number: FLD 152 764 767
Notice of Deficiency - 1

Please address the following items.

1. Attachment 4, Solid Waste Rules and Their Revisions: Under the Operational Requirements for Attachment 4, the narrative indicates "the unauthorized waste will be shipped off site as soon as it can be scheduled and when it is economically feasible possible." 62-701.710(4)(b) identifies specific storage timeframes for unauthorized wastes, please include the specific timeframes described in the rule in attachment 4.

General Comments:

1. Table 3, Containment Area #5: It appears that the Containment Products are revised from "Oil Filter Crusher" To "Used Oil", "Carbon bottom" To "Oily Solids", and "Oily Solids batch treatment" To "Oily Solids" in Tanks 109, 110 and 111 respectively.

Please clarify what exactly you meant or revise the closure cost estimates as appropriate to reflect these changes.

2. Site Map and Tank Table: Please provide both a hard copy and an electronic formatted (PDF) copy of a tank table (8 ½"X11") and a site map (8 1/2"X11). The Tank table shall identify the tank number, capacity and content.

The hard copies of these items will be attached to the revised application. Please send a copy of the tank table and site map via e-mail so they can be attached to the draft renewal permit.