



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

FACILITY INFORMATION:

Facility Name: HOWCO Environmental Services

On-Site Inspection Start Date: 06/24/2010

On-Site Inspection End Date: 06/24/2010

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:

Non-Handler

Used Oil

INSPECTION TYPE:

Routine Inspection for Used Oil Processor facility

Routine Inspection for Used Oil Marketer facility

Routine Inspection for Used Oil Transporter facility

Routine Inspection for Used Oil Generator facility

Routine Inspection for Used Oil Transfer Facility

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

INSPECTION PARTICIPANTS:

Principal Inspector: Kelly M. Honey, Environmental Specialist III

Other Participants: Shannon Camp, Environmental Specialist II; Lee Morris, Director of Operations;
Richard Dillen, Quality Assurance Officer

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

SIC CODE: 2911 - Manufacturing - petroleum refining

TYPE OF OWNERSHIP: Private

Introduction:

HOWCO Environmental Services (HOWCO) was inspected by the Department of Environmental Protection (Department) to evaluate the facility's compliance with state and federal hazardous waste regulations. The inspectors were accompanied throughout by Richard Dillen, who manages the Laboratory, and Lee Morris, who manages the Yard. In the past ten years, the facility has been inspected by the Department eight times, most recently on April 23, 2009. HOWCO has a used oil processing permit issued by the Department on July 7, 2007. This permit expires on August 3, 2010. HOWCO submitted its permit renewal application on June 8, 2010.

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). At the plant, there are currently five employees, plus two recovery truck drivers and one tanker trailer driver. The facility is on City of St. Petersburg water and sewer systems. The processes at the facility have not changed since the previous inspection.

Since the previous inspection, HOWCO has replaced all its underground piping with aboveground

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pipng, in accordance with Chapter 62-762, FAC. Additionally, the yard has been resurfaced. The majority of old equipment that used to be in the "bone yard" has also been removed. The overall appearance of the yard was relatively tidy. In the tank farm, it was noted that two of the ASTs (#134 and #133) had open access ports on top. during the inspection, HOWCO staff were directed to replace the port plugs.

One of the facility's bullhorns was tested and found to be operable. The fire and emergency equipment are inspected monthly and tested annually. HazMat supplies are stored in one of three large trailers on the south side of the property. The contents of the HazMat trailer included personal protective equipment as well as spill control equipment. During the inventory of the trailer, it was determined that some of the equipment referenced on HOWCO's inventory list were missing, including two drums and four bags of absorbent. It was noted that these materials were at the facility, but not in the designated trailer. These materials have since been replaced. In the past, the Department has allowed HOWCO to keep its list of emergency equipment in the trailer, however, in accordance with 40 CFR 279.52(b)(2)(v), HOWCO must include this list in its contingency plan.

At the time of the inspection, there was one properly labeled 20 cubic yard roll-off of oily waste. At the rear of the solid waste pad were two aboveground storage tanks (ASTs) that were labeled used oil. These ASTs were open. Staff indicated that these ASTs were probably returned from customers. Near the drum washing area, there were approximately 25 drums to be cleaned. Some of the drums were not closed or the lids were cracked allowing rainwater to enter the drums and mix with the oil residue inside. In future, HOWCO should ensure that these drums are protected from the weather. In the oily waste staging area, there were approximately 39 drums of grease, oily sorbent material, asphalt, recovered diesel fuel and paper filters. There was also one unlabeled drum of used oil filters. In the used oil filter processing area, there were approximately 100 drums of used oil filters in storage. One of these drums was not labeled. The crusher was equipped with a small pan to collect leaking hydraulic oil. This pan was also not labeled. All these containers were labeled during the inspection, and staff were directed to replace the plugs in the open ASTs. Crushed used oil filters are shipped to a smelter. Used oil collected in the crushing unit is transferred to tank #109.

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 and the oil-extracted sludge generated at the facility is to be analyzed annually. The sludge was sampled on April 23, 2009, and again on July 14, 2010, and results indicate that both wastestreams are nonhazardous. Solid waste is either sent to a landfill or to the incinerator. HOWCO is under both its 40,000-gallon limit for sending received solid wastes to a landfill and its 200,000-gallon limit for sending received solid wastes to an energy recovery facility.

The Maintenance Shop generates used oil filters, used oil, used antifreeze and oily waste. There is also a 25-gallon parts washer in use. Spent solvent from the parts washer is disposed of with the shop's used oil. Used oil and antifreeze containers are equipped with secondary containment. During the inspection, it was noted that the container labeled "used antifreeze" actually contained used oil. There were also two, partially full aerosol cans observed in the trash. Aerosol cans that are not empty are hazardous waste. HOWCO needs to review proper hazardous waste management with applicable staff to prevent this from occurring again. In the room next to the Maintenance Shop, there was one spent lamp observed without a box or label. This has since been corrected. Batteries are returned to the vendor for core credit.

In the area next to the Maintenance Shop, there were two full drums labeled "used oil" without containment. After the inspection, the drums were moved across the street to the plant and processed. Also in this area were six 5-gallon containers of waste, some of which appeared were open and in poor shape, especially around the openings. The containers were on a containment pallet covered with a piece of plywood and appeared to have been forgotten. Some of the containers were labeled "dirty lacquer thinner," and some were not labeled and appeared to be old product containers. This is a violation of specific permit condition I.14.(a). After investigating the source of the containers, HOWCO determined that the material was from facility maintenance

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activities several years ago. It appears that the dirty thinner was generated during the job, and the old products were determined to be unusable a couple of years later. Since the inspection, the contents of the containers were transferred to a drum and are awaiting disposal as hazardous waste.

Behind the laboratory, there are two 55-gallon drums of used oil in secondary containment. The drums are covered and labeled. 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. It was noted that the contingency plan originally approved in the permit application does not contain the home addresses of the emergency coordinators. In accordance with 40 CFR 279.52(b)(2)(iv), the plan must list names, addresses, and phone numbers (office and home) of all persons qualified to act as emergency coordinator. Ensure that this information is added to the plan. Most HOWCO employees, including all the designated emergency coordinators, attended a Used Oil Management Workshop on 12-05-09, and all HOWCO drivers also attended the associated Driver Training Class.

New Potential Violations and Areas of Concern:

Checklist Independent Potential Violations and Areas of Concern

Type:	Violation
Rule:	279.54(c), 62-710.401(6)
Explanation:	At the time of the inspection, there were two drums of used oil without secondary containment behind the vehicle maintenance area. (corrected)
Corrective Action:	Subsequent to the inspection the facility moved the drums of used oil across the street and processed the used oil.

Type:	Violation
Rule:	273.14(e), 273.13(d)(1)
Explanation:	At the time of the inspection, there was one spent fluorescent lamp in the vehicle maintenance area that was not labeled or in a container. (corrected)
Corrective Action:	After the inspection, the spent lamp was placed into a closed and properly labeled container.

Type:	Area Of Concern
Rule:	62-710.401(6)
Explanation:	In the drum washing area and next to the drum washing area, there were several staged drums that did not have properly fitting lids or had open bung holes. These drums contained rainwater and used oil, technically making them subject to used oil container management requirements, such as labeling.
Corrective Action:	As discussed during the inspection, drums with used oil residue should be protected from the weather to keep them from filling with rainwater while staged.

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Type: Violation
Rule: 279.52(b)(2)(v)
Explanation: The equipment list provided in the plan does not include an up to date list of emergency equipment at the facility, and the list maintained in the HazMat / emergency response trailer did not match the equipment available at the time of the inspection. Specifically, there were two empty drums and four bags of absorbent material missing from the trailer. (corrected)
Corrective Action: After the inspection, the missing items in the trailer were replaced. Note that a copy of this list must be included in the contingency plan as required by Rule.

Type: Area Of Concern
Rule: 279.52(b)(2)(iv)
Explanation: The home addresses of the designated emergency coordinators is not provided in the contingency plan.
Corrective Action: By Rule, the contingency plan must include the home addresses and phone numbers of the emergency coordinators. This information must be added to the plan immediately.

Type: Violation
Rule: 279.54(f)(1)
Explanation: At the time of the inspection, there was an unlabeled pan of used oil under the filter crusher and a drum of used oil next to the vehicle maintenance area that was labeled "used antifreeze." (corrected)
Corrective Action: The catch pan and the drum were both correctly labeled during the inspection.

Type: Area Of Concern
Rule: 261.5(g)(3)(iii)
Explanation: At the time of the inspection, there were two partially full aerosol cans (D001) observed in the trash in the vehicle maintenance area. (corrected)
Corrective Action: During the inspection, the aerosol cans were removed from the trash and put aside for proper disposal as hazardous waste.

Type: Violation
Rule: 279.52(a)(1)
Explanation: At the time of the inspection, there were six 5-gallon containers of paint related wastes on a pallet next to the vehicle maintenance area. Some of the containers were in deteriorating condition and appeared to have been forgotten. This is a violation of specific permit condition I.14.(a). (corrected)
Corrective Action: After the inspection, the facility transferred the contents of the six containers into a 55-gallon drum. Arrangements are being made to have the waste picked up and disposed of as hazardous.

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Type: Violation
 Rule: 62-710.850(5)(a)
 Explanation: There were two drums of used oil filters that were not labeled. (corrected)
 Corrective Action: The drums of used oil filters were labeled during the inspection.

Type: Violation
 Rule: 62-710.401(6)
 Explanation: Also observed during the inspection were two ASTs in the solid waste processing area with open access ports. ASTs #133 and #134 also had open access ports. (corrected)
 Corrective Action: During the inspection, facility staff were directed to obtain plugs for the openings in all four ASTs.

Summary of Potential Violations and Areas of Concern:Potential Violations

Rule Number	Area	Date Cited	Explanation
Checklist Independent Violations			
279.54(c), 62-710.401(6)		06/24/2010	At the time of the inspection, there were two drums of used oil without secondary containment behind the vehicle maintenance area. (corrected)
273.14(e), 273.13(d)(1)		06/24/2010	At the time of the inspection, there was one spent fluorescent lamp in the vehicle maintenance area that was not labeled or in a container. (corrected)
279.52(b)(2)(v)		06/24/2010	The equipment list provided in the plan does not include an up to date list of emergency equipment at the facility, and the list maintained in the HazMat / emergency response trailer did not match the equipment available at the time of the inspection. Specifically, there were two empty drums and four bags of absorbent material missing from the trailer. (corrected)
279.54(f)(1)		06/24/2010	At the time of the inspection, there was an unlabeled pan of used oil under the filter crusher and a drum of used oil next to the vehicle maintenance area that was labeled "used antifreeze." (corrected)
279.52(a)(1)		06/24/2010	At the time of the inspection, there were six-5-gallon containers of paint related wastes on a pallet next to the vehicle maintenance area. Some of the containers were in deteriorating condition and appeared to have been forgotten. This is a violation of specific

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Rule Number	Area	Date Cited	Explanation
			permit condition I.14.(a). (corrected)
62-710.850(5)(a)		06/24/2010	There were two drums of used oil filters that were not labeled. (corrected)
62-710.401(6)		06/24/2010	Also observed during the inspection were two ASTs in the solid waste processing area with open access ports. ASTs #133 and #134 also had open access ports. (corrected)

Areas of Concern

Rule Number	Area	Date Cited	Explanation
Checklist Independent Areas of Concern			
62-710.401(6)		06/24/2010	In the drum washing area and next to the drum washing area, there were several staged drums that did not have properly fitting lids or had open bung holes. These drums contained rainwater and used oil, technically making them subject to used oil container management requirements, such as labeling.
279.52(b)(2)(iv)		06/24/2010	The home addresses of the designated emergency coordinators is not provided in the contingency plan.
261.5(g)(3)(iii)		06/24/2010	At the time of the inspection, there were two partially full aerosol cans (D001) observed in the trash in the vehicle maintenance area. (corrected)

Conclusion:

Based on the observations made during this inspection, HOWCO was not in compliance with its permit or rules governing used oil processors. The facility has since 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

8/12/2010

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

Shannon Camp

INSPECTOR NAME

Environmental Specialist II

INSPECTOR TITLE

NO SIGNATURE

INSPECTOR SIGNATURE

FDEP

ORGANIZATION

Lee Morris

REPRESENTATIVE NAME

Director of Operations

REPRESENTATIVE TITLE

NO SIGNATURE

REPRESENTATIVE SIGNATURE

HOWCO Environmental Services

ORGANIZATION

Richard Dillen

REPRESENTATIVE NAME

Quality Assurance Officer

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.