

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



109 AZALEA POINT DRIVE SOUTH • PONTE VEDRA BEACH • FLORIDA • 32082

August 11, 2010

Mr Tim Hagan
President and CEO
HOWCO Environmental Services
3701 Central Avenue
St Petersburg, Florida 33713

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 Hagan,

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 responses are provided in the same order as listed in the referenced FDEP letter.

1 Attachment 4

In item Number 1, the FDEP letter dated July 12, 2010, indicated that a specific timeframe needs to be included in the used oil permit for the storage of unauthorized waste at the above referenced facility. Pursuant to rule 62-701 710(4)(b), a timeframe for the storage of unauthorized waste has been included into the Used Oil Permit for the facility in Attachment 4 – Solid Waste Handling. The revised permit body is provided as enclosure (1).

General Comments

1 – Table 3 Under General Comments, Number 1 of the FDEP letter dated July 12, 2010, clarification was requested for the changes made to Table 3, Containment Area # 5. The information in Table 3 reflects what materials will be stored in Tanks 109, 110 and 111. There are no changes to the closure cost estimates as the content of the tanks have not changed.

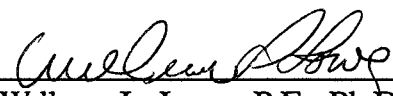
Tank # 109 contains used oil collected from the used oil filter crushing operation. Tank 109 is registered with the FDEP as an above ground storage tank. It is listed in the FDEP database under STCM # 10424 and is listed as Tank # 181 – Waste oil.

**CORRECTIVE MEASURES IMPLEMENTATION PLAN
FOR THE DNT TREATMENT AREA - SOURCE MATERIAL
CONSOLIDATION/BIOREMEDIATION AREA**

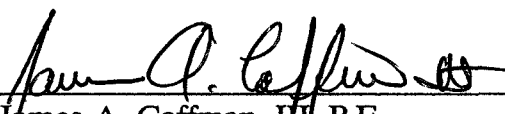
Prepared for

AIR PRODUCTS AND CHEMICALS, INC
Escambia Plant
Pace, Florida

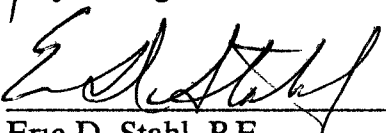
September 1996



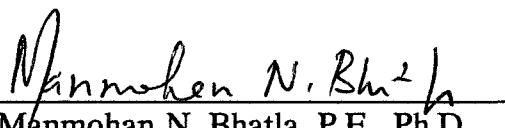
William L. Lowe, P E , Ph D
Project Engineer



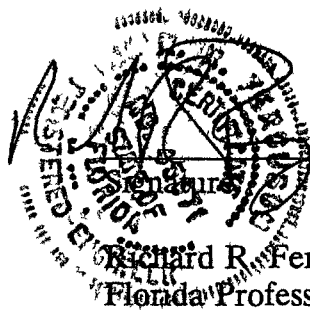
James A. Coffman, III, P E
Project Engineer



Eric D. Stahl, P E
Project Manager



Manmohan N. Bhatla, P E , Ph D
Project Director



Date 9/16/96
Richard R. Ferguson, P E
Florida Professional Engineer
P E # 45671

Prepared by

ROY F WESTON, INC

W O No 00815-008-003-0020

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.

- Mesh screen
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 solids solidification.
- Wastewater treatment sludge is removed from several tanks and may be processed/dewatered through an on-site filter press. The solids are then placed in a roll-off container and mixed with other dry solids or a solidification agent may be added.

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 may be pumped into a treatment tank, sludge box, vacuum box for oil reclamation and/or solids processing. Solidification may also be done in these containers.

Receiving and Processing of Oily Solids

Oily solids arriving in drums will be offloaded on 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.

Only solids arriving in vacuum trucks or other type bulk shipments will be offloaded into other containers or Oily Solids Batch Treatment Tank, 111 or the Cone Bottom Tank, 110. Tanks 110 and 111 will be utilized to remove and recover oils and oily waters for processing. The remaining solids from this process will be gravity fed into a roll-off container or dump trailer for further processing and then shipped off-site to a permitted thermal unit or landfill. Solidification agents may be added to these containers prior to shipment.

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 Batch Treatment Tank, 111 or the Cone Bottom Tank, 110.

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 and sloped drainage that prevents stormwater from leaving the property. The facility is designed with secondary containment for the regulated tanks that contain petroleum. The yard area is sloped with a drainage trench with a low collection point. Stormwater is not allowed to be discharged off the property, unless it has been collected and properly pretreated for discharge to a permitted Publicly Owned Treatment Facility (POTF). Howco 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 was designed to minimize standing water accumulation. The facility is appropriately designed to hold the permitted amount of solid waste for processing until the waste is transferred for disposal or recycling. An oil water separator is located at the south end of the facility. Rainwater that is not contaminated and does not have an oily sheen is discharged through the oil water separator after the rainfall event.

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 DOT shipping container. The containers are placed in a portable secondary containment unit, which will be located between the west loading/unloading area and the drum storage area. The unauthorized waste will be marked "UNAUTHORIZED WASTE" and will be wrapped with yellow caution tape. Pursuant to Rule 62-701.710(4)(b), stored putrescible wastes shall not be allowed to remain at the facility for more than 48 hours. The putrescible waste will be shipped to a permitted solid waste facility for proper treatment or disposal. Any other unauthorized waste received such as hazardous waste, PCB's, asbestos waste, explosives, toxic waste, biohazardous waste, non-approved and nonconforming waste streams by the facility shall be segregated and transported to an authorized disposal or recycling facility within 30 days of receipt. 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 oil water separator is visually inspected before it is allowed to flow off site. If any visible contamination is present, the stormwater is contained and treated in the onsite permitted Industrial Wastewater Pretreatment Facility before discharge to a POTW. Stormwater does not discharge directly off site. The stormwater is contained on the property.

The St. Petersburg facility has applied for No Exposure Certification for Exclusion from NPDES Stormwater Permitting in April of 2010 to the Florida Department of Environmental Management. A copy of the letter is provided as enclosure (2).

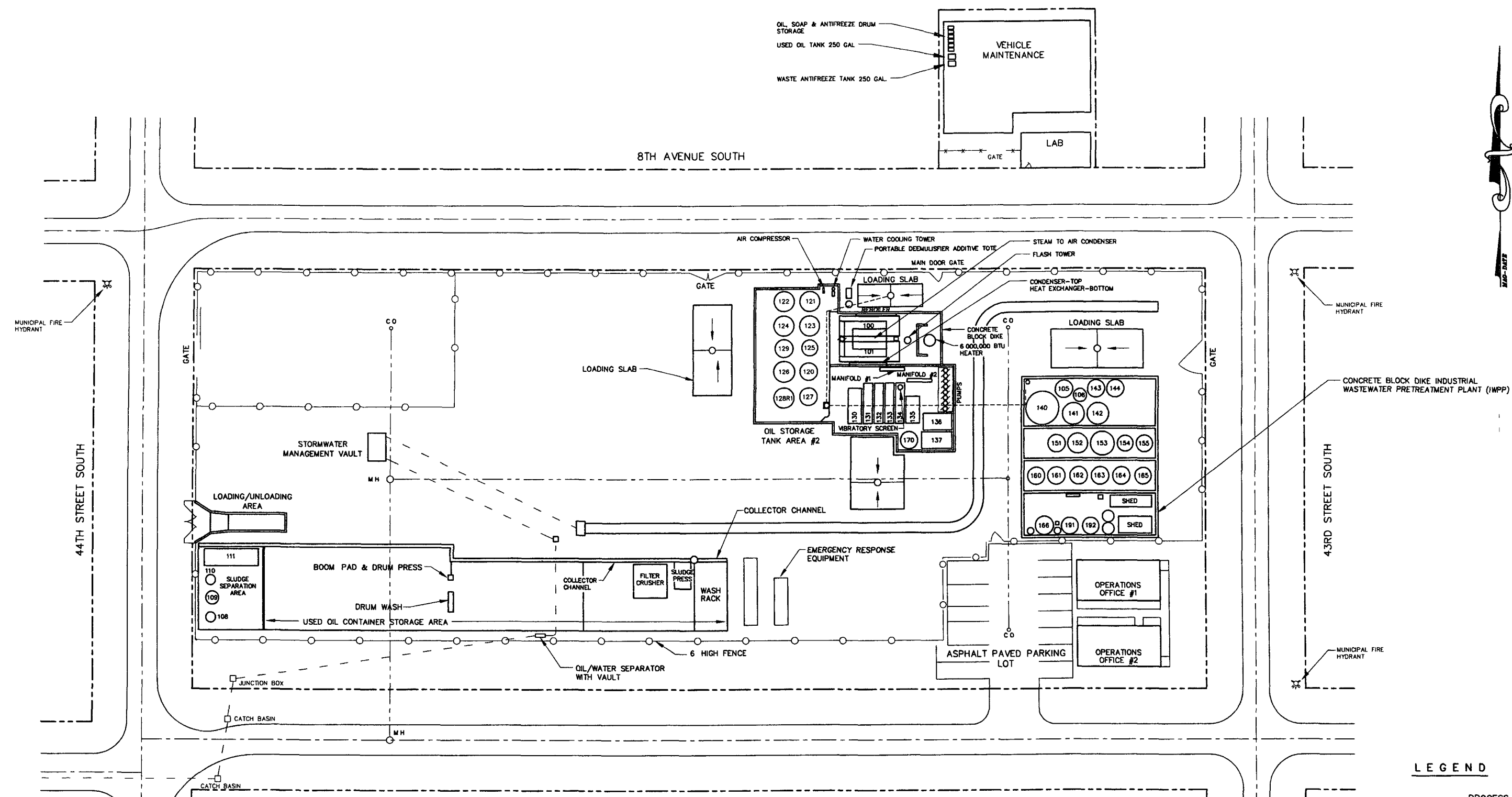
Record Keeping

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.



GENERAL INFORMATION

FACILITY NAME - HOWCO ENVIRONMENTAL SERVICES
 LOCATION/MAILING ADDRESS - 843 43RD STREET SOUTH - ST PETERSBURG FL 33711
 TELEPHONES - (727) 323-0818 - (727) 327-8467 - 1-800-435-8467
 FAX - (727) 323-2249
 FACILITY EPA ID NO - FLD 152764767
 STATE (EMPLOYER) ID NO - 59-2599751
 LAND AREA - 3.2 ACRES
 SITE INFORMATION - NEAREST COMMUNITY - SURROUNDING AREA
 NEAREST WATERWAY - 3 MILES S/SW
 NEAREST BUILDING - 200 FT EACH DIRECTION
 GROUNDWATER FLOW - SW
 NEAREST GROUNDWATER USE - NONE WITHIN 1 MILE
 PREVAILING WIND - WINTER NW TO SE - SUMMER EASTERLY
 LOCATION INFORMATION - INDUSTRIAL PARK LOCATION
 FLOOD INFORMATION - 100 YEAR FLOOD PLAN

STAFF	MANAGEMENT/SUPERVISION	- 2
	PLANT OPERATIONS	- 10
	DRIVERS/FIELD	- 12
	LAB/ MAINTENANCE	- 4
	TOTAL	28

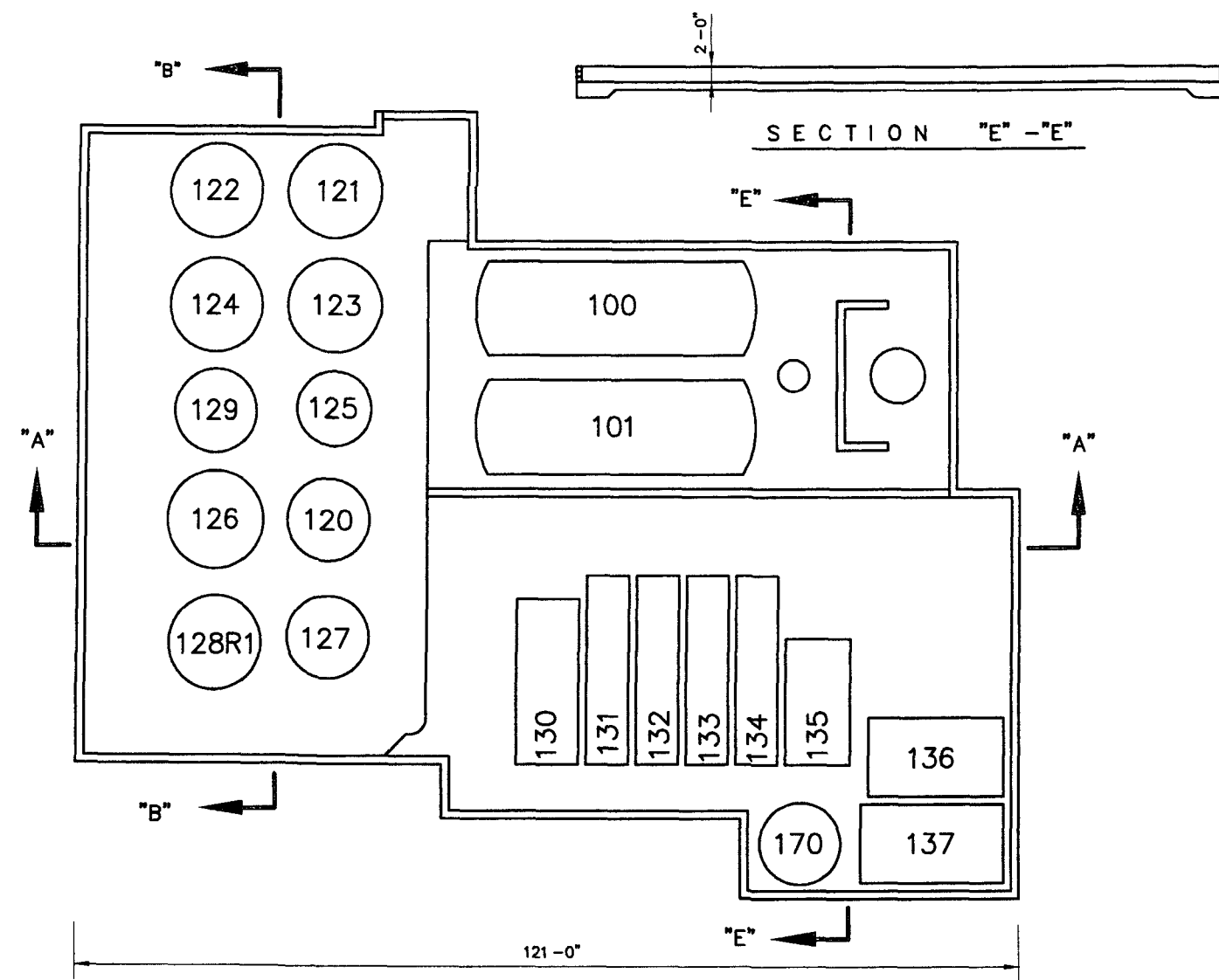
LEGEND

- PROCESS PIPING
- SANITARY SEWER
- STORM SEWER

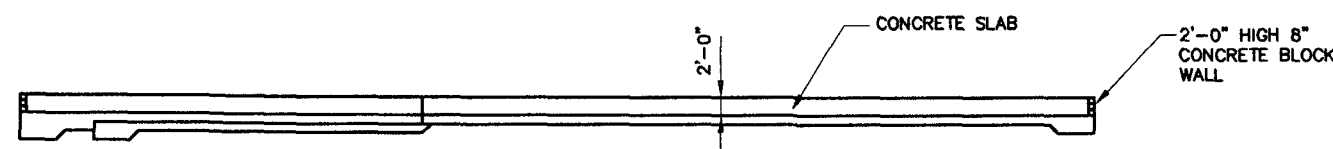
SITE ELEVATION IS APPROXIMATELY 35 FEET ABOVE MSL

ENCLOSURE (3)
 ENVIRONNEERING, Inc Ltr Dtd 7/22/10

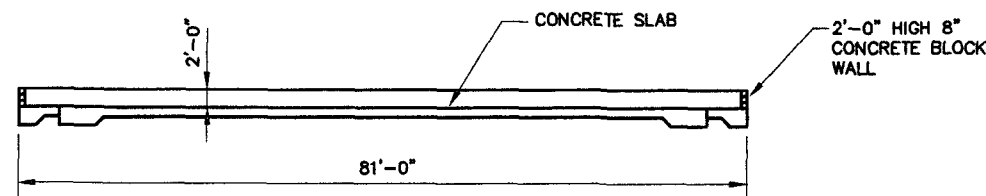
ENVIRONNEERING, INC 109 AZALEA POINT DRIVE SOUTH PONTE VEDRA BEACH FLORIDA		
SCALE 1"=60' DATE MAY 25 2010	PROJECT 3947	DRAWN GCR
HOWCO ENVIRONMENTAL SERVICES 843 43RD ST SOUTH - ST PETERSBURG FL		
FACILITY SITE PLAN		FIGURE 2



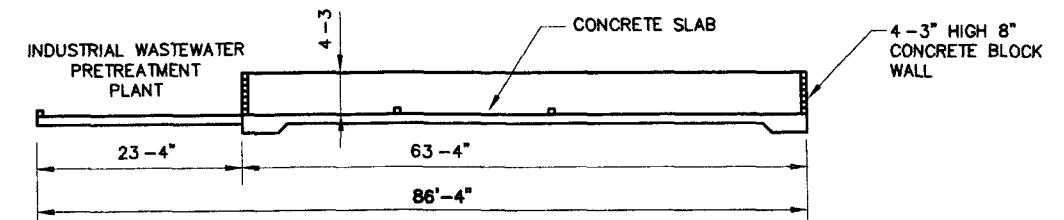
OIL PROCESSING PLANT



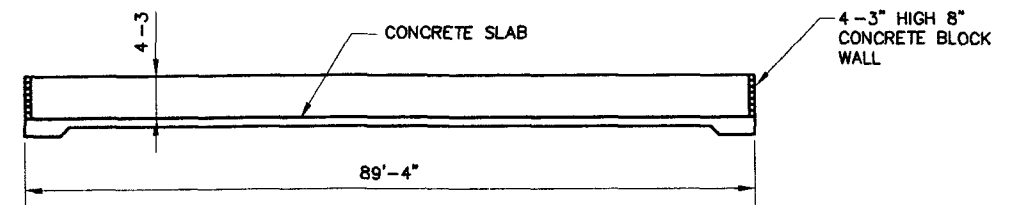
SECTION "A" - "A"



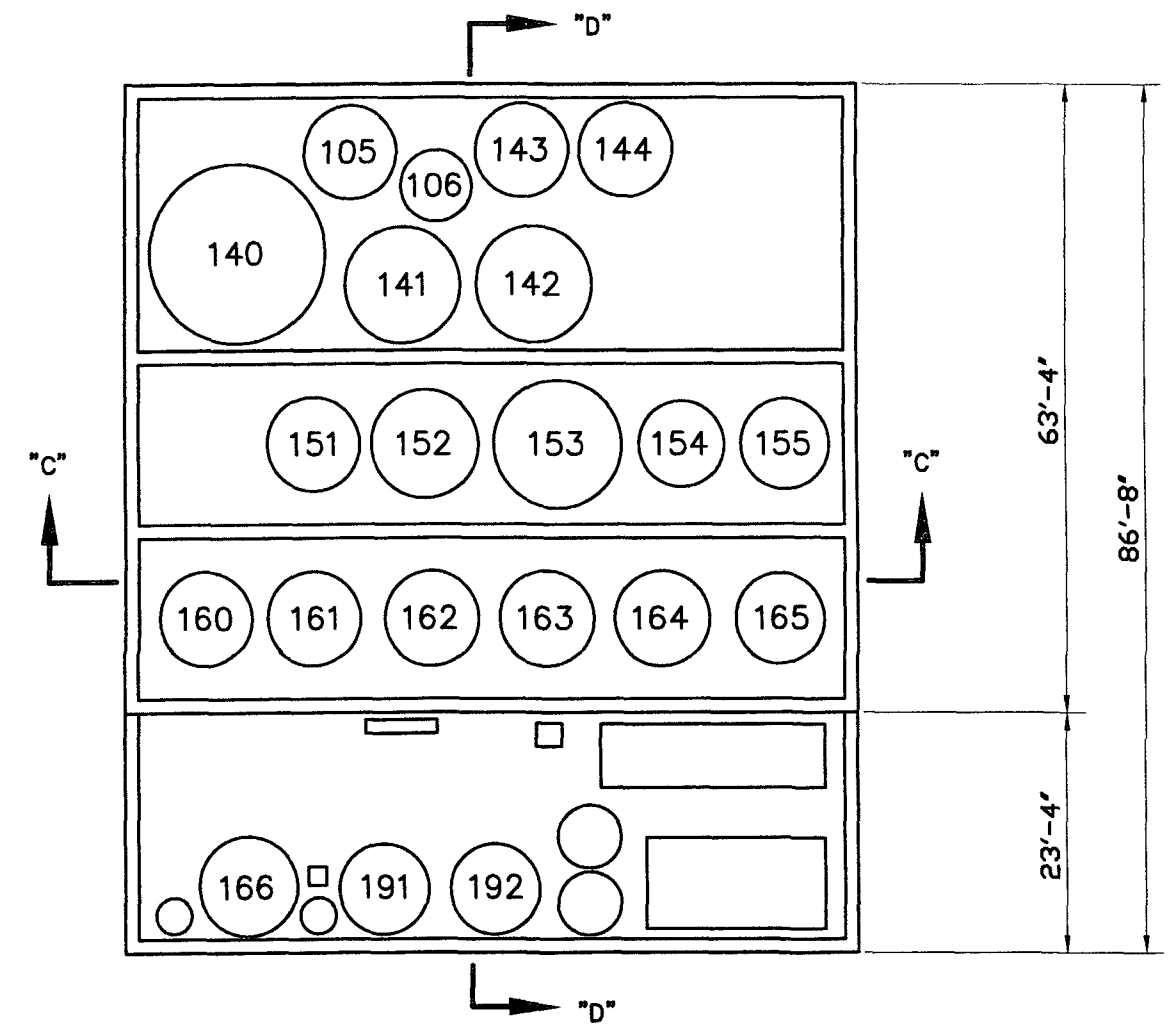
SECTION "B" - "B"



SECTION "D" - "D"



SECTION "C" - "C"



INDUSTRIAL WASTEWATER PRETREATMENT PLANT

ENVIRONMENTAL, INC. 109 AZALEA POINT DRIVE SOUTH PONTE VEDRA BEACH, FLORIDA		
SCALE DATE MAY 25 2010	PROJECT 3947	DRAWN G.C.R.
HOWCO ENVIRONMENTAL SERVICES 843 43RD ST SOUTH - ST PERERSBURG FL.		
SPILL CONTAINMENT DIKES PLAN		D-4-2