HOWCO Environmental Services

September 3, 2010

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

RE: HOWCO Environmental Services
Astor Used Oil Facility
EPA I.D. No. FLD 101 828 689
Permit Number: 27221-HO-004, 27221-SO-005
Used Oil Processing Facility Permit Renewal
FDEP Response Letter Dated July 30, 2010

Dear Mr. Kothur,

This letter is in response to the Florida Department of Environmental Protection (FDEP) comment letter dated July 30, 2010, concerning the Used Oil Permit Renewal for the HOWCO Environmental Services – Astor 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,

Richard Dillen
For: Tim Hagan
President and CEO
HOWCO Environmental Services

Cc: FDEP/Orlando

<COMMENT LETTER FDEP-3945-1-A>

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

ENVIRONEERING INC.

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

September 2, 2010

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

RE: HOWCO Environmental Services
Astor Used Oil Facility
EPA I.D. No. FLD 101 828 689
Permit Number: 27221-HO-004, 27221-SO-005
Used Oil Processing Facility Permit Renewal
FDEP Response Letter Dated July 30, 2010

Dear Mr. Hagan,

This letter is in response to the Florida Department of Environmental Protection (FDEP) comment letter dated July 30, 2010, concerning the Used Oil Permit Renewal for the HOWCO Environmental Services – Astor 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 30, 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).

2. Attachment 6

The listed local authority/Agencies and the associated phone numbers have been changed from St. Petersburg Facility numbers to Astor Facility numbers. The numbers have been verified by Mr. Richard Dillen with HOWCO Environmental Services. The revised Attachment 6 is provided as enclosure (2).

3. Attachment 6

The addresses for the individuals described as the Primary and Secondary Emergency Coordinators has been included on page 18 of Attachment 6 (enclosure (2)).

(904) 665-0100 (904) 612-1456 • MOBILE (904) 665-0101• FAX

4. Attachment 6

The typographical errors have been revised and are provided as enclosure (2).

5. Attachment 6

Pursuant to CFR Part 279.52(b)(2)(vi) the communication method to signal facility personnel in the event of an emergency situation requiring evacuation of facility personnel is described in Section 6.0 Emergency Procedures, Sub-Section Emergency Communication System. The revised Attachment 6 is provided as enclosure (2). Additionally, an Emergency Evacuation Route (with alternate evacuation route) (**Figure 2**) is presented as enclosure (3).

General Comments

1. Site Map and Tank Table

Under General Comments, Number 1 of the FDEP letter dated July 30, 2010, a hard copy and an electronic copy of a Site Map (8 1/2" X 11") and Tank Table (8 1/2" X 11") identifying the tank number, capacity and content was requested. An 8 1/2"X 11" Site Map and an 8 1/2" X 11" Tank Table are provided as enclosures (4) and (5). An electronic PDF copy of both the Site Map and the Tank Table will also be provided by e-mail.

If you have any questions or comments, I can be reached at (904) 665-0100 (office) or at (904) 612-1456 (mobile). Thanks for the opportunity to be of service!

Sincerely,

Timothy W. Rudolph, P.E.
Environmental Engineer

<COMMENT LETTER-3945-1-A>

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.

Reviewed By:
ENVIRONEERING, INC.

Enclosure (1)
Environeering, Inc. Ltr Dtd 9/2/2010

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. 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 non-conforming 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 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 at far as records were available. The first inspection obtained by the data base search was in 1999 and there was no violations noted.

ATTACHMENT 6

EMERGENCY PREPAREDNESS, PREVENTION & CONTINGENCY PLAN

Table of Contents

Enclosures Figure 1 – Site Plan

Figure 2 – Emergency Evacuation Routes

Reviewed By:
ENVIRONEERING, INC.

[redacted]
Enclosure (2)
Environeering, Inc. Ltr Dtd 9/2/2010

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

- PPE use
- Containment procedures
- Record keeping and reporting policies
- Operating & Inspection procedures
- Loading and unloading procedures
- 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 possibly.

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
  - Normal working hours – the plan will be activated by use of an electronic loudspeaker
  - 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
325 Northeast 42nd Street
Ocala, Florida 34479
Work Phone # 352-759-2916
Cell Phone # 352-598-0758

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

Recycling Facility Secondary Emergency Coordinator (Secondary PIC)
Lee Morris
2571 46th Terrace North
St. Petersburg, Florida 33714
Work Phone # 727-327-8467
Cell Phone # 727-543-5429

OR

Tim Hagan
7100 Sunset Way, App. 1208W
St. Pete Beach, Florida 33706
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. Pursuant to CFR Part 279.52(b)(2)(vi), visual signals, voice warnings or a bullhorn signal 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.

Emergency Evacuation Plan

In the event of an emergency situation requiring evacuation of personnel at the facility, personnel will be notified as described above in the Emergency Communication System. An emergency evacuation route for the Astor Facility is provided as **Figure 2**.

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:
    - Oil dry
    - Dike plugs
    - Booms and absorbent pads
    - Aggregate material for containment
- Decontamination equipment includes:
    - Surfactant and water
    - 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 AND RECORD KEEPING

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 harem 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

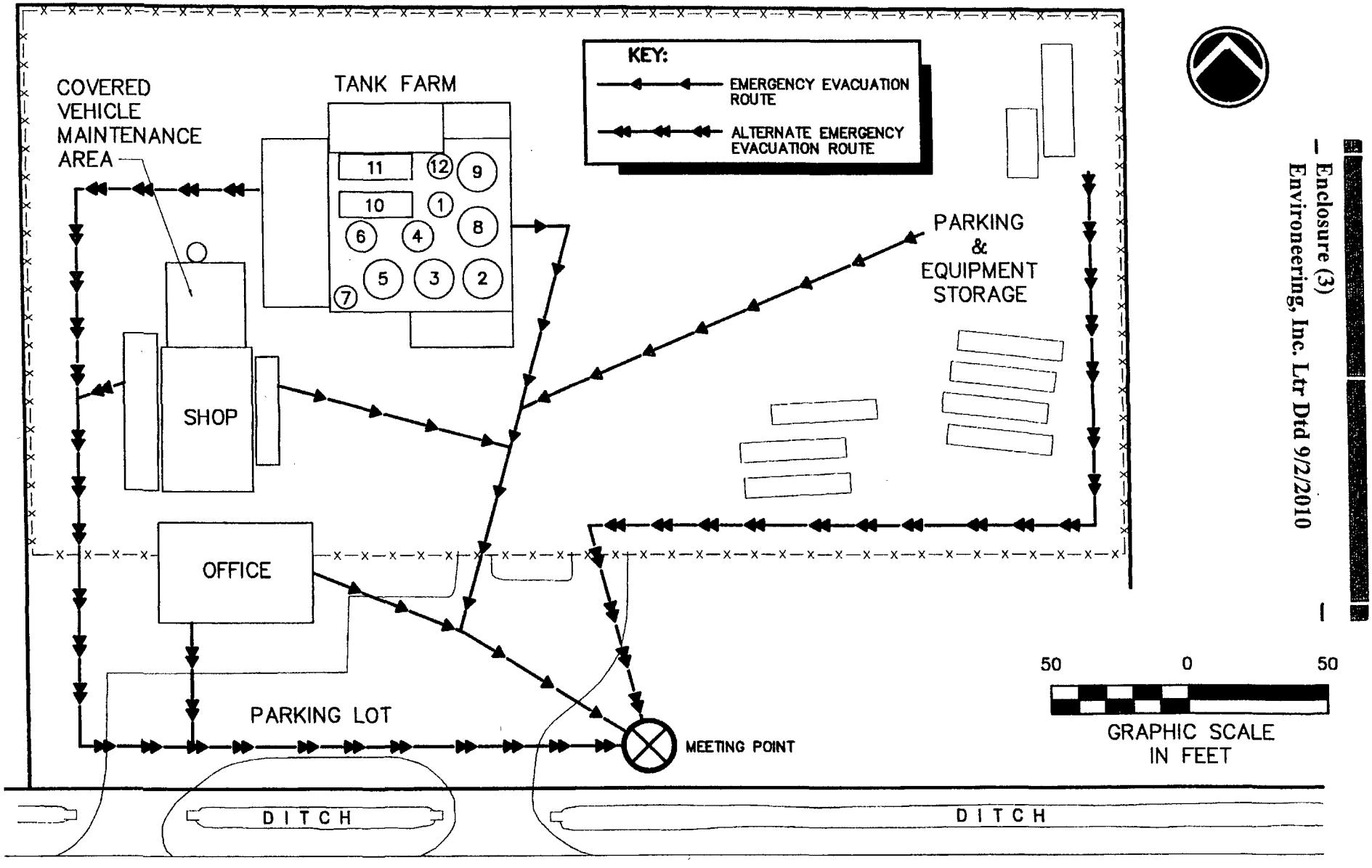
This plan will be revised, if necessary, whenever:

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

Local Authority/Agency	Phone Number
Lake County Sheriff's Department	911 352-343-2101
Lake County Fire Rescue, Station 10	911 352-759-2443
Emergency Medical Services	911
Florida Hospital (Waterman)	352-253-3333
West Volusia Memorial Hospital	386-943-4522
Munroe Regional Medical center	352-671-2080
Ocala Regional Medical Center	352-401-1000
Poison Control Center	800-222-1222
Florida. Department of Environmental Protection	
Tallahassee (24 hour line)	800-320-0519
Central District (Lake County)	407-894-7555
EPA Region IV	404-562-8700
State Warning Point	800-413-9911

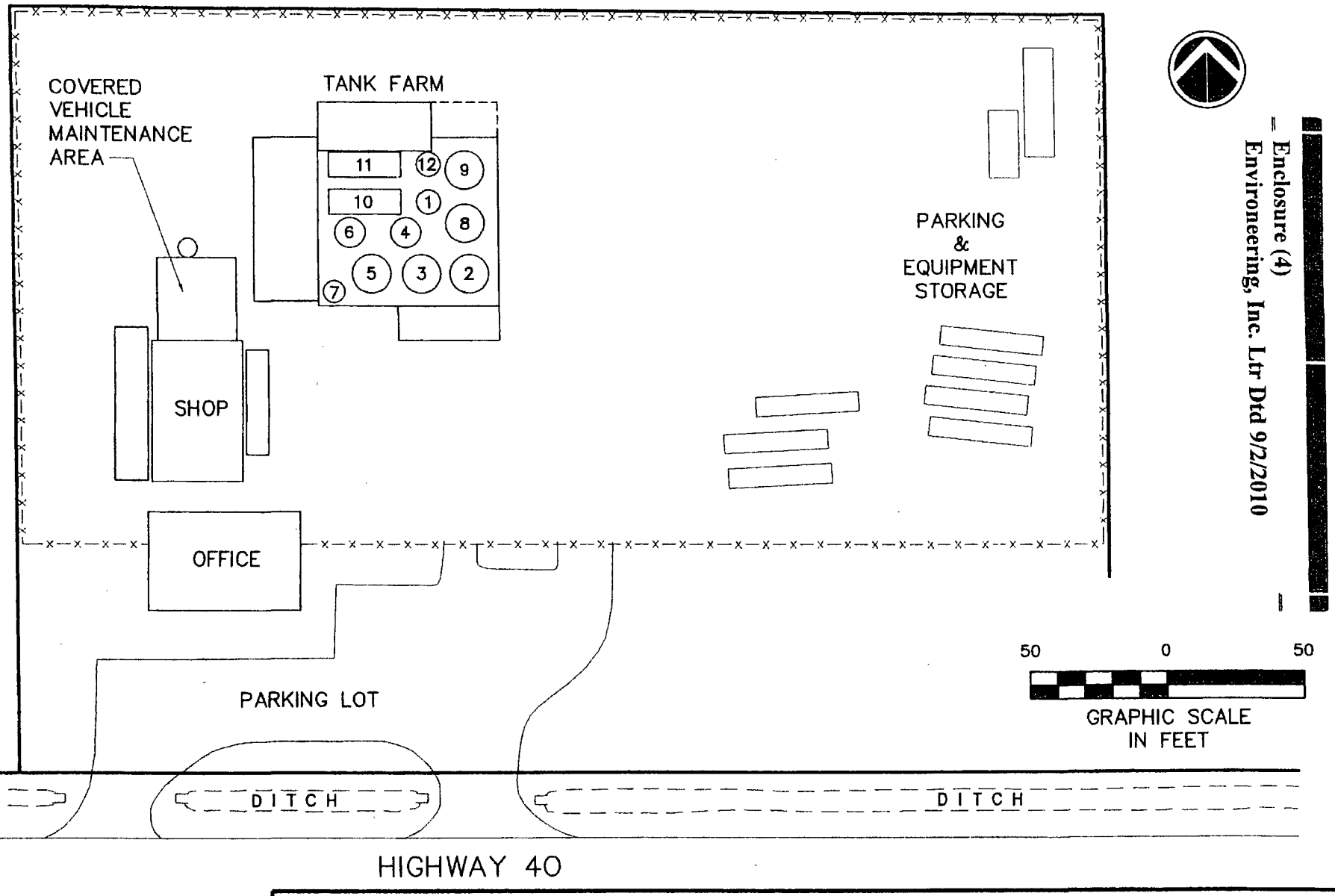
National Response Center	800-424-8802
CHEMTREC (Chemical Information)	800-424-9300
Division of Emergency Response	800-635-7179
Department of Transportation	813-632-6859
Florida. Highway Patrol	813-632-6859
Occupational Safety and Health Administration (OSHA)	813-626-1177



– Enclosure (3)
Environeering, Inc. Ltr Dtd 9/2/2010

FIGURE 2 – EMERGENCY EVACUATION ROUTES

PREPARED FOR: HOWCO ENVIRONMENTAL SERVICES 24133 STATE ROAD 40 ASTOR, FLORIDA 32102	PREPARED BY: ENVIRONEERING, INC. 1735 EMERSON STREET, SUITE 3 JACKSONVILLE, FL 32207 904–665–0100	CHECKED BY: TWR APPROVED BY: TWR JOB NO 3945 REVISED:	DRAWN BY: GCR DATE: MAR. 8, 2010 SCALE: 1" = 50' 3945–2 DRAWING NO.



= Enclosure (4)
Environeering, Inc. Ltr Dtd 9/2/2010

FIGURE 1 – SITE PLAN

PREPARED FOR: HOWCO ENVIRONMENTAL SERVICES 24133 STATE ROAD 40 ASTOR, FLORIDA 32102	PREPARED BY: ENVIRONEERING, INC. 1735 EMERSON STREET, SUITE 3 JACKSONVILLE, FL 32207 904-665-0100	CHECKED BY: TWR APPROVED BY. TWR JOB NO. 3863 REVISED:	DRAWN BY: GCR DATE: MAR 8, 2010 SCALE: 1" = 50' 3863-1 DRAWING NO.

Tank Number	Tank Capacity (gal)	Tank Contents
1	8,225	water/antifreeze
2	27,640	Used oil
3	27,640	Used oil
4	10,000	Off specification fuel
5	27,640	Used oil
6	10,000	Used oil
7	8,000	Burner fuel
8	29,000	Used oil
9	38,000	Used oil
10	15,000	Used oil (heated tank)
11	15,000	Used oil (heated tank)
12	500	Screened oil

Enclosure (5)
Environeering, Inc. Ltr Dtd 9/2/2010