



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

FACILITY INFORMATION:

Facility Name: HOWCO Environmental Services

On-Site Inspection Start Date: 08/11/2010

On-Site Inspection End Date: 08/11/2010

ME ID#: 63050

EPA ID#: FLD101828689

Facility Street Address: 24133 State Road 40, Astor, Florida 32102-3031

Contact Mailing Address: 3701 Central Ave, Saint Petersburg, Florida 33713-8338

County Name: Lake

Contact Phone: (727) 327-8467

NOTIFIED AS:

Non-Handler

Used Oil

INSPECTION TYPE:

Routine Inspection for Used Oil Processor facility

INSPECTION PARTICIPANTS:

Principal Inspector: John White, Inspector

Other Participants: Dan Medici, Supervisor; Danielle Bentzen, Inspector; Shabbir Rizvi, Inspector

LATITUDE / LONGITUDE: Lat 29° 9' 46.3142" / Long 81° 32' 26.2423"

SIC CODE: 2911 - Manufacturing - petroleum refining

TYPE OF OWNERSHIP: Private

Introduction:

On August 11, 2010, John White, Danielle Bentzen, and Shabbir Rizvi, Florida Department of Environmental Protection (FDEP), conducted a routine inspection of HOWCO Environmental Services (HOWCO), located at 24133 State Road 40, Astor Florida for compliance with used oil and used oil filter regulations. Dan Medici, HOWCO Astor Plant Manager, accompanied the inspectors.

HOWCO operates under Used Oil Processing Facility permit number 27221-HO-003, issued on 8/25/2005. The permit expired on 8/25/2010. As required by Specific Condition Part I, Number 11 of the permit, a renewal permit application was received by the Department on June 28, 2010.

HOWCO is a registered used oil Transporter, Transfer Facility, Processor, Marketer, Filter Transporter, Filter Transfer Facility and Filter Processor. The facility's updated 8700-12FL, Florida Notification of Regulated Waste Activity form, was received on March 2, 2010.

The company is headquartered in St. Petersburg, Florida. The St. Petersburg facility is a registered used oil transporter and processor as well as a used oil filter transporter and processor.

Prior to HOWCO, North Florida Oil was operating as a used oil and used oil filter transporter and processor at this location. HOWCO took over the operations in 2000. The facility is connected to the City of Astor sewer and water systems. The facility has four employees on site.

INSPECTION HISTORY

On October 16, 2007, HOWCO was inspected and found to be out of compliance. Violations noted included: failure to make required arrangements with local authorities; and failure to document the EPA identification number of the source of the used oil. The violations were resolved with a Short Form Consent Order, OGC number 08-0163, executed on April 10, 2008. Resolution included payment of \$3,000.00 in civil penalties.

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On August 25, 2006 HOWCO was inspected and found to be in compliance.

On February 5, 2004 HOWCO was inspected and found to be in compliance.

On November 25, 2003 HOWCO was inspected and found to be in compliance

Process Description:

HOWCO transports used oil, used oil filters, non-hazardous sludges, antifreeze, absorbents and miscellaneous oily wastes to their facility in Astor from various locations throughout Florida. The Astor facility acts as a transfer location for consolidation of wastes shipped to the HOWCO facility in St. Petersburg.

Used oil filters are not off-loaded at the Astor facility. They are just transferred from one truck to a semi tractor trailer and taken to the St. Petersburg facility once a week. Used oil filters are ultimately taken to U.S. Foundry in Miami. Antifreeze, consolidated at the St. Petersburg facility, is shipped to EcoFreeze in Georgia for recycling. Absorbents, i.e. kitty litter or saw dust, and grease are taken to the Okeechobee Landfill. The solid waste incinerator in Pinellas County receives the absorbent pads, booms, and paper filters.

When a truck returns to the facility, a composite sample is pulled before the oil is off-loaded for storage. The composite sample is again screened for halogens and distilled to determine water content. Loads are bulked for shipment to HOWCO, St. Petersburg. At the time of the inspection HOWCO had eleven above ground storage tanks (AST) located on a concrete pad surrounded by a concrete wall. The ASTs contained the following:

Tank #	CAPACITY (gallons)	CURRENT USE
1	8,225	Petroleum Contact Water
2	27,640	Used Oil
3	27,640	Used Oil
4	10,000	Process water
5	27,640	Used Oil
6	10,000	Waste Antifreeze
7	8,000	Burner Oil
8	29,000	Out of Service
9	38,000	Used Oil
10	15,000	Out of Service
11	15,000	Used Oil

Fire extinguishers and spill equipment were located next to the containment area. West Volusia checks fire extinguishers on an annual basis. For on-site communication, each employee is equipped with a cellular telephone. A direct alarm for the building security is through ADT.

The used oil processing operation consists of the use of an emulsifying chemical, an organic acid, added to the used oil and then heating of the oil. The used oil is heated to separate the oil and water. The water is transferred to a tank and the used oil is run through a shaker screen. Solids are collected on the screen and stored in a 55-gallon drum. After the last processing, the solids are transferred to the St. Petersburg facility for solidification.

Minor vehicle maintenance work is done on the property. Used oil and antifreeze generated on-site accumulates in 55-gallon drums, one for used oil and one for antifreeze. Each drum is stored within an over-pack container on a concrete pad. The drums were properly labeled and managed.

Inspection of the tanker loading/off-loading area found the area to be clean with no visible releases. The tank farm was dry with no visible releases. Along one wall of the tank farm were seven 55-gallon drums. One drum, dated 5-19-10, contained "Oily Trash." The oily trash is debris generated by yard operations. The remaining drums were as follows: One drum of "New

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Absorbent"; One drum of "Oily Pads"; One drum of "Used Oil"; Two drums of "Used Absorbents" and one drum that contained oil collected from the oil transfer hose. The hose is allowed to drain into the drum, preventing releases to the ground.

RECORD REVIEW

Shipping papers were reviewed for 2009 and 2010. Used oil is screened for halogens and water before collection. Initial screening is performed with a "sniffer" which is calibrated to 900 ppm total halogen content. If a load fails, a Dexsil Chlor-D-Test is run before acceptance. Screening test results are recorded on the manifest. Generator EPA identification numbers are being included on shipping papers.

The contingency plan was most recently updated June 11, 2010. In a Notice of Deficiency, dated, July 27, 2010, the Department requested the plan be corrected to include the emergency coordinators home address. A September 3, 2010, response to the Notice of Deficiency contained a corrected Emergency Preparedness, Prevention & Contingency Plan.

Analytical results for processed oil shipped off-site to burners was reviewed and found to be in compliance with on-specification oil requirements.

Mr. Medici stated personnel training was last conducted December 2009. On September 20, 2010, training records for 2009 were provided by Mr. Lee Morris, Director of Operation for HOWCO. All four employees at the Astor facility were at the training event. Specific Conditions, Part I, Number 14, allows HOWCO to maintain personnel training records at the Permittee's corporate headquarters in St. Petersburg. Training for 2010 is scheduled for December 4, 2010.

Chapter 62-762.711(2)(c), F.A.C. requires records of the following to be kept for two years: monthly visual inspections performed in accordance with paragraph 62-762.641(2)(e), F.A.C. The presence of a regulated substance's odor, sheen, or freeproduct shall be recorded for each sampling event. Monthly Inspections were being conducted by Mr. Medici up until May 3, 2010. Therefore, inspections for June and July, 2010, were not conducted.

New Potential Violations and Areas of Concern:

Checklist Independent Potential Violations and Areas of Concern

Type: Violation

Rule: 62-762

Explanation: Rule 62-762.711(2)(c), F.A.C., for aboveground storage tanks requires records of the following to be kept: Release detection results, including electronic test results, regardless of the frequency, and monthly visual inspections performed in accordance with paragraph 62-762.641(2)(e), F.A.C. The presence of a regulated substance's odor, sheen, or free product shall be recorded for each sampling event;

Monthly Inspections were being conducted by Mr. Medici up until May 3, 2010. Therefore, inspections for June and July, 2010, were not conducted.

Corrective Action: Inspections required by the permit must be conducted and the results recorded. Within 15 days of receipt of this report, HOWCO must provide copies of completed inspections for August and September 2010.

Summary of Potential Violations and Areas of Concern:

Potential Violations

Rule Number	Area	Date Cited	Explanation
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Rule Number	Area	Date Cited	Explanation
Checklist Independent Violations 62-762		08/11/2010	<p>Rule 62-762.711(2)(c), F.A.C., for aboveground storage tanks requires records of the following to be kept: Release detection results, including electronic test results, regardless of the frequency, and monthly visual inspections performed in accordance with paragraph 62-762.641(2)(e), F.A.C. The presence of a regulated substance's odor, sheen, or free product shall be recorded for each sampling event;</p> <p>Monthly Inspections were being conducted by Mr. Medici up until May 3, 2010. Therefore, inspections for June and July, 2010, were not conducted.</p>

Areas of Concern

No Areas of Concern

Conclusion:

HOWCO is a registered used oil Transporter, Transfer Facility, Processor, Marketer, Filter Transporter, Filter Transfer Facility and Filter Processor and was not in compliance at the time of inspection.

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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.

John White

PRINCIPAL INSPECTOR NAME

Inspector

PRINCIPAL INSPECTOR TITLE

NO SIGNATURE

PRINCIPAL INSPECTOR SIGNATURE

FDEP

ORGANIZATION

Danielle Bentzen

INSPECTOR NAME

Inspector

INSPECTOR TITLE

NO SIGNATURE

INSPECTOR SIGNATURE

FDEP

ORGANIZATION

Shabbir Rizvi

INSPECTOR NAME

Inspector

INSPECTOR TITLE

NO SIGNATURE

INSPECTOR SIGNATURE

FDEP

ORGANIZATION

Dan Medici

REPRESENTATIVE NAME

Supervisor

REPRESENTATIVE TITLE

NO SIGNATURE

REPRESENTATIVE SIGNATURE

HOWCO

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.