



October 14, 2010

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

Received

OCT 19 2010

BSHW

RE: HOWCO Environmental Services
St. Petersburg Used Oil Facility
EPA I.D. 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 September 21, 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,

A handwritten signature in black ink, appearing to read 'R. Dillen', is written over a horizontal line.

Richard Dillen
Quality Assurance Officer
HOWCO Environmental Services

Cc: Mr. Jim Dregne, FDEP/Tampa

RECEIVED
RCRA

OCT 19 2010

Hazardous Waste Regulation

ATTACHMENT 6

EMERGENCY PREPAREDNESS, PREVENTION & CONTINGENCY PLAN

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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: 843 43rd Street South, St. Petersburg, Florida 33711

Telephone No.: (727) 327-8467

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)

The following spill response equipment will be maintained on site. Items used during a spill will be cleaned and decontaminated. Items consumed during a spill response will be replaced after the spill. The emergency response equipment will be inspected one per month.

Supplies:	Absorbent booms	5 bales
	Absorbent pads	5 bales
	Absorbent granular	10 bags
	Flashlights	5 each

Equipment:	Push Brooms	3 each
	Shovels	4 each
	55-gallon container	2 each
	Rakes	2 each

Personal Protection:	Tyvek suits	5 each
	Gloves	5 each
	Safety glasses	5 each
	Rain gear	5 each

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
 - o PPE use
 - o Containment procedures
 - o Record keeping and reporting policies
 - o Operating & Inspection procedures
 - o Loading and unloading procedures
 - o 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 retention basin. 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 feasible.

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)

David Roehm

9487 123rd Way North

Seminole, FL 33772

Cell Phone # 727-385-1508 Work Phone # 727-327-8467 (24) Hour 1-800-435-8467

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, FL 33714

Cell Phone # 727-543-5429 Work Phone # 727-327-8467 (24) Hour 1-800-435-8467

Or
Tim Hagan
7100Sunset Way, App. 1208W
St. Petersburg Beach, FL 33706
Cell Phone # 727-804-4446 Work Phone # 727-327-8467 (24) Hour 1-800-435-8467

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. Visual and voice warnings 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.

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

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 harm 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

<u>Local Authority/Agency</u>	<u>Phone Number</u>	<u>Contact Period</u>
Any Emergency	911	
FL. Department of Environmental Protection		
Tallahassee (24 hour line)	800-320-0519	
Southwest District	813-632-7600	
National Response Center	800-424-8802	
CHEMTREC (Chemical Information)	800-424-9300	

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Division of Emergency Response	800-635-7179
Department of Community Affairs (DCA)	800-320-0519
Pinellas County Emergency Management	727-464-3800
Florida Marine Patrol	800-342-5367
Coast Guard	727-896-6187
St Petersburg Fire Department	727-893-7272
Department of Transportation	813-632-6859
FL. Highway Patrol	813-632-6859
OSHA	813-626-1177
Department of Environmental Management	
Division of Air Quality	727-464-4422
Bayfront Medical Center	727-893-6714
Bayfront Convenient Care	727-526-3627
Edward White Hospital	727-323-1111
Convenient Care (Company Doctor)	727-347-9719

ATTACHMENT 7 UNIT MANAGEMENT DESCRIPTION

Drums

The drums will be handled and unloaded in a dedicated drum area. The area is constructed of reinforced concrete. Proper aisle space will be maintained for containers. There will space between pallets drums rows with the minimum clearance of two feet between rows. HOWCO will inspect the drums on a weekly basis and inspection logs will be completed and maintained on-site.

Piping

Piping systems consist of steel pipes with welded joints. Most tanks are connected by three and two-inch piping. Used oil storage tanks are connected by three-inch carbon steel, iron or PVC pipes.

Storage Tanks

Above ground storage tanks currently meet the requirements of Rules 62-762.511.

Storage tanks, process tanks and process equipment are periodically inspected in accordance with Rule 62-762.601. The inspection records maintained on-site. Tanks are labeled according to their contents.

Removal of oil/water from containment

1. Accumulated water is inspected for the presence of a sheen or petroleum odor.
2. If a sheen or odor is present, the water is considered to be contaminated with petroleum and will be transferred to a used oil storage tank.
3. The water is not considered to be contaminated and may be disposed of to grade as storm water if a sheen or odor is not present. The discharge grade will be conducted in accordance with the facility Spill Prevention, Control and Countermeasures (SPCC) Plan under 40 CFR Part 112.
4. Records consisting of the date, time, presence or absence of sheen or odor, and person removing the accumulation are maintained for each discharge event.

Inspections

The facility shall be inspected once per month using the enclosed Monthly Inspection Form.

HOWCO Environmental Services - Monthly Tank System Visual Inspection Checklist												
YEAR: 843 43rd Street South - ST. PETERSBURG, FLORIDA												
GENERAL DESCRIPTION UST OR AST CAPACITY (GALLONS) TANK CONTENTS CHECKLIST ITEMS	JANUARY DATE	FEBRUARY DATE	MARCH DATE	APRIL DATE	MAY DATE	JUNE DATE	JULY DATE	AUGUST DATE	SEPTEMBER DATE	OCTOBER DATE	NOVEMBER DATE	DECEMBER DATE
GENERAL	Y/N or N/A	Y/N or N/A	Y/N or N/A	Y/N or N/A	Y/N or N/A	Y/N or N/A	Y/N or N/A	Y/N or N/A	Y/N or N/A	Y/N or N/A	Y/N or N/A	Y/N or N/A
1. Tank System Contingency Plan on site and at appropriate location?												
2. If tank certificate of registration is required to be posted, is certificate posted?												
3. Are tank system components properly painted or identified?												
4. Is the Tank 135 Alarm panel powered and not in Alarm or System Failure condition?												
5. Is tank system Spill Kit on site?												
6. Is tank system Spill kit properly stocked?												
7. Is Spill Kit readily available and in designated location?												
8. Access to fill components locked or otherwise secured?												
9. Is tank surface free of dents, pits, cracks, rust or other damage?												
10. Is tank piping free of dents, pits, cracks, rust or other damage?												
11. No evidence of leakage around piping flanges, elbows and other fittings?												
12. Are piping sumps clear and unobstructed?												
13. Are Manway area free of product and other debris?												
14. Is secondary containment structure intact with drain valves closed?												
COMMENTS:												

* An explanation is needed for any item that is answered with a "No"

HOWCO Environmental Services - Monthly Tank System Visual Inspection Checklist												
YEAR: 843 43rd Street South - ST. PETERSBURG, FLORIDA												
GENERAL DESCRIPTION UST OR AST CAPACITY (GALLONS) TANK CONTENTS CHECKLIST ITEMS	JANUARY DATE	FEBRUARY DATE	MARCH DATE	APRIL DATE	MAY DATE	JUNE DATE	JULY DATE	AUGUST DATE	SEPTEMBER DATE	OCTOBER DATE	NOVEMBER DATE	DECEMBER DATE
GENERAL	Y/N or N/A	Y/N or N/A	Y/N or N/A	Y/N or N/A	Y/N or N/A	Y/N or N/A	Y/N or N/A	Y/N or N/A	Y/N or N/A	Y/N or N/A	Y/N or N/A	Y/N or N/A
15. No evidence of leakage around piping flanges, elbows and other fittings on Tank 137?												
16. No suspicious or unusual petroleum odors are present in the tank system area?												
17. No signs of distressed vegetation that could be the result of a petroleum release?												
18. Are manway/manhole covers in place correctly?												
19. Are eye wash and safety showers operational?												
20. Are Fire Extinguishers operational and in proper locations?												
21. Alarms (float sensor, optical sensors) in correct position?												
22. Alarm wiring in good condition (not loose or frayed)?												
23. Security fence intact?												
24. Security lighting working properly?												
25. Parking Area Clean - no oil puddles?												
26. Containers Storage Area Clean?												
27. Storage Areas Clean & Free of Spills?												
28. Solid Waste Marked - Processed or Unprocessed.												
INSPECTOR'S INITIALS												
COMMENTS:												
Note: All releases, spill or leaks of Petroleum product over 25 gallons must be reported to the FDEP by the Spill manager.												

* An explanation is needed for any item that is answered with a "No"

HOWCO Environmental Services MONTHLY INSPECTION - DETAILS

DATE & INITIALS	Type of Activity				EXPLANATION
	<input type="checkbox"/>	Alarm Verification	<input type="checkbox"/>	Alarm Incidents & Results	
	<input type="checkbox"/>	Tank Malfunctions	<input type="checkbox"/>	Tank Repairs	
	<input type="checkbox"/>	Piping Malfunctions	<input type="checkbox"/>	Piping Repairs	
	<input type="checkbox"/>	Routine Maintenance	<input type="checkbox"/>	Tank System Modification	
	<input type="checkbox"/>	Monitor Repair	<input type="checkbox"/>	Tank Tightness Testing by Vendor	
	<input type="checkbox"/>	Tank System Alarm Panel	<input type="checkbox"/>	Other	
	<input type="checkbox"/>	Leak/Spill	<input type="checkbox"/>		
	<input type="checkbox"/>	Alarm Verification	<input type="checkbox"/>	Alarm Incidents & Results	
	<input type="checkbox"/>	Tank Malfunctions	<input type="checkbox"/>	Tank Repairs	
	<input type="checkbox"/>	Piping Malfunctions	<input type="checkbox"/>	Piping Repairs	
	<input type="checkbox"/>	Routine Maintenance	<input type="checkbox"/>	Tank System Modification	
	<input type="checkbox"/>	Monitor Repair	<input type="checkbox"/>	Tank Tightness Testing by Vendor	
	<input type="checkbox"/>	Tank System Alarm Panel	<input type="checkbox"/>	Other	
	<input type="checkbox"/>	Leak/Spill	<input type="checkbox"/>		
	<input type="checkbox"/>	Alarm Verification	<input type="checkbox"/>	Alarm Incidents & Results	
	<input type="checkbox"/>	Tank Malfunctions	<input type="checkbox"/>	Tank Repairs	
	<input type="checkbox"/>	Piping Malfunctions	<input type="checkbox"/>	Piping Repairs	
	<input type="checkbox"/>	Routine Maintenance	<input type="checkbox"/>	Tank System Modification	
	<input type="checkbox"/>	Monitor Repair	<input type="checkbox"/>	Tank Tightness Testing by Vendor	
	<input type="checkbox"/>	Tank System Alarm Panel	<input type="checkbox"/>	Other	
	<input type="checkbox"/>	Leak/Spill	<input type="checkbox"/>		

Record and activity regarding the fuel tank and/or piping that cannot be recorded or explained on the Monthly Tank System Visual Inspection Checklist.

1. Write the date and your initials in Column 1.
2. Mark the appropriate box in Column 2.
3. Explain in detail whatever occurred, whatever you did and whatever you found during inspections

TANK SYSTEM ACTIVITY LOG
<HOWCO-ACTIVITYLOG-SPCC-3947-A>