



Florida Department of Environmental Protection

Southwest District
13051 North Telecom Parkway
Temple Terrace, Florida 33637-0926
Telephone: 813-632-7600

Rick Scott
Governor

Jennifer Carroll
Lt. Governor

Herschel T. Vinyard Jr.
Secretary

October 13, 2011

Sent via email only
thagan@howcousa.com

Mr. Tim Hagan
HOWCO Environmental Services
3701 Central Avenue
St. Petersburg, FL 33713

**Re: HOWCO Environmental Services
EPA ID # FLD 152 764 767
Pinellas County**

Dear Mr. Hagan:

Thank you for your assistance and cooperation during the Department of Environmental Protection's August 31, 2011, Hazardous Waste Compliance Evaluation Inspection.

Enclosed is the inspection report generated from this visit. Based upon the information gathered during the inspection, HOWCO Environmental Services was found to be in compliance with its permit and the regulations governing used oil processors, transporters, marketers and conditionally exempt small quantity hazardous waste generators.

If you have any questions, please feel free to call me at (813) 632-7600, extension 369.

Sincerely,

Kelly M. Honey
Environmental Specialist III
Division of Waste Management
Southwest District

/kmh

enclosure

cc: Lee Morris, HOWCO Environmental (LeeMorris@howcousa.com)
Gene Quinn, Pinellas County SQG Program (gquinn@pinellascounty.org)



Florida Department of
Environmental Protection
Hazardous Waste Inspection Report

FACILITY INFORMATION:

Facility Name: HOWCO Environmental Services

On-Site Inspection Start Date: 08/31/2011

On-Site Inspection End Date: 08/31/2011

ME ID#: 1038

EPA ID#: FLD152764767

Facility Street Address: 843 43rd St S, St Petersburg, Florida 33711-1922

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

County Name: Pinellas

Contact Phone: (727) 327-8467

NOTIFIED AS:

Non-Handler

Used Oil

INSPECTION TYPE:

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

Routine Inspection for Used Oil Processor facility

Routine Inspection for Universal Waste Transporter facility

Routine Inspection for Used Oil Marketer facility

INSPECTION PARTICIPANTS:

Principal Inspector: Kelly M. Honey, Environmental Specialist III

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

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

SIC CODE: 2911 - Manufacturing - petroleum refining

TYPE OF OWNERSHIP: Private

Introduction:

HOWCO Environmental Services (HOWCO) was inspected by the Department of Environmental Protection (Department) to evaluate the facility's compliance with state and federal hazardous waste regulations. The inspectors were accompanied throughout by Richard Dillen, who manages the Laboratory, and Lee Morris, who manages the Yard. In the past ten years, the facility has been inspected by the Department nine times, most recently on June 24, 2010. HOWCO has a used oil and solid waste processing permit issued by the Department on June 2, 2011. The permit expires on August 3, 2015.

Process Description:

HOWCO stores, processes and markets used oil and is a registered used oil filter transporter and processor, as well. Additionally, HOWCO accepts oily waste solids which are processed and solidified prior to disposal. As a result of the lab wastes generated during QA testing, HOWCO is also a conditionally exempt small quantity generator of hazardous waste (CESQG). At the plant, there are currently five employees, plus two recovery truck drivers and one tanker trailer driver. The facility is on City of St. Petersburg water and sewer systems. The processes at the facility have not changed since the previous inspection.

The overall appearance of the yard was relatively tidy. HOWCO now has 48 aboveground storage tanks (ASTs), storing petroleum contact water (PCW), used oil, etc. All of the ASTs were recently repainted, and none were observed to have open access ports. One of the facility's bullhorns was tested and found to be operable, although the cabinet in which it is stored needs repair. The fire

Inspection Date: 03/31/2011

and emergency equipment are inspected monthly and tested annually. It was noted that the person responsible for inspections, Tim Hagan, Jr., while noting deficiencies, was not recording the date and nature of associated corrective actions. The Department recommends that this information be recorded and maintained as part of the operating record.

HazMat supplies are stored in one of three large trailers on the south side of the property. The contents of the HazMat trailer included personal protective equipment as well as spill control equipment. Since the previous inspection, HOWCO has added its list of emergency equipment to the contingency plan in accordance with 40 CFR 279.52(b)(2)(v). In the used oil filter processing area, there were approximately 38 empty drums, 19 drums of used oil filters, and 11 large bins of used oil filters in storage. All the containers were labeled.

At the time of the inspection, there were three properly labeled 20 cubic yard roll-offs of oily solid waste (e.g., oily filter paper, oily sludge) on the solid waste storage pad, along with a parked truck of solid waste. Nearby were approximately 36 drums of oily absorbent material in the oily waste staging area. The solid waste storage pad is constructed of thick HDPE and is covered with welded steel plates to protect the lining. The plates were noted to be in need of repair. The Department recommends repair of the steel plates as soon as possible to prevent equipment from either tearing the liner directly, or from causing a bent and damaged steel plate to tear it or wear a hole in it.

Solid waste managed at the facility includes oily solid waste generated by HOWCO and its customers. Solid waste streams received are analyzed at least once every five years in accordance with the permit. The WTU sludge and the oil-extracted sludge generated at the facility is to be analyzed annually. The sludge was last sampled June 8, 2011, and results indicate that both waste streams are nonhazardous. Solid waste is either sent to a landfill or to the incinerator. HOWCO is well under both its 40,000-gallon limit for sending received solid wastes to a landfill and its 200,000-gallon limit for sending received solid wastes to an energy recovery facility.

The Maintenance Shop generates used oil filters, used oil, used antifreeze and oily waste. There is also a 25-gallon parts washer in use. Spent solvent from the parts washer is disposed of with the shop's used oil. Used oil and antifreeze containers are equipped with secondary containment. Batteries are returned to the vendor for core credit. It was noted that the area next to the Maintenance Shop contained no wastes.

Behind the laboratory, there are two 55-gallon drums of used oil in secondary containment. The drums are covered and labeled. The drums collect sample waste from the laboratory. Processed oil is randomly sampled biweekly and tested to confirm it is on-spec. Analyses are done off site by PhosLab. Samples of processed oil are retained in the laboratory for thirty days. Hazardous COD testing waste is generated in the laboratory, and spent vials are accumulated in a box labeled "spent vials." Staff said fluorescent lamps are taken on CESQG days to the County collection center for disposal, which is also how laboratory wastes are disposed of. Hazardous wastes have not been disposed of since the last inspection. It was noted that the XRF analyzer unit had been shipped back to the manufacturer for repair. The lab was using Dexsil kits until the unit is returned, which should be within a week.

Records were reviewed and found to be complete and up to date with the following exception. Since the previous inspection, HOWCO has switched to an electronic recordkeeping system that is used company wide. As a result, the acceptance and delivery records list all three HOWCO transporter facilities and their EPA ID numbers on the records, but there is no indication which actually transported the used oil. HOWCO needs to clearly indicate which facility did the transporting on each record. In accordance with 40 CFR 279.52(b)(2)(iv), the contingency plan now lists the home addresses of all persons qualified to act as emergency coordinator. HOWCO employees, including all the designated emergency coordinators, attended a Used Oil Management Workshop in December 2010, which included required Spotter Training.

New Potential Violations and Areas of Concern:

Checklist Independent Potential Violations and Areas of Concern

Inspection Date: 08/31/2011

Type: Area Of Concern

Rule: 403.727(1)(a)

Explanation: In accordance with 62-701.710(3)(b), FAC, waste processing activities should be conducted at a facility with a leachate control system designed and operated prevent discharge of leachate and avoid mixing of leachate with stormwater, and to minimize the presence of standing water. The Department is concerned that the current condition of solid waste processing pad will result in a breach of the under liner, resulting in discharge of leachate. Additionally, the state of the steel over layer is now resulting in the presence of standing water after rainfall events.

Corrective Action: HOWCO needs to evaluate the condition of the leachate control system and make repairs or modifications as needed to ensure compliance with the Rule.

Type: Area Of Concern

Rule: 279.56(b)(1), 279.56(b)(3), 279.56(a)(3), 279.56(a)(1)

Explanation: The new recordkeeping system in use does not specify which of HOWCO's three facilities is the transporter.

Corrective Action: HOWCO needs to indicate which of its three facilities is the transporter on its delivery and acceptance records.

Summary of Potential Violations and Areas of Concern:**Potential Violations**

No Violations

Areas of Concern

Rule Number	Area	Date Cited	Explanation
Checklist Independent Areas of Concern			
403.727(1)(a)		08/31/2011	In accordance with 62-701.710(3)(b), FAC, waste processing activities should be conducted at a facility with a leachate control system designed and operated prevent discharge of leachate and avoid mixing of leachate with stormwater, and to minimize the presence of standing water. The Department is concerned that the current condition of solid waste processing pad will result in a breach of the under liner, resulting in discharge of leachate. Additionally, the state of the steel over layer is now resulting in the presence of standing water after rainfall events.
279.56(b)(1), 279.56(b)(3), 279.56(a)(3),		08/31/2011	The new recordkeeping system in use does not specify which of HOWCO's three facilities is the transporter.

Conclusion:

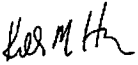
Based on the observations made during this inspection, HOWCO was operating in compliance with its permit and rules governing used oil processors.

Inspection Date 08/31/2011

Signed:

A hazardous waste compliance inspection was conducted on this date, to determine your facility's compliance with applicable portions of Chapters 403 & 376, F.S., and Chapters 62-710, 62-730, 62-737, & 62-740 Florida Administrative Code (F.A.C.). Portions of the United States Environmental Protection Agency's Title 40 Code of Federal Regulations (C.F.R.) 260 - 279 have been adopted by reference in the state rules under Chapters 62-730 and 62-710, F.A.C. The above noted potential items of non-compliance were identified by the inspector(s).

This is not a formal enforcement action and may not be a complete listing of all items of non-compliance discovered during the inspection.

Kelly M. Honey	Environmental Specialist III
PRINCIPAL INSPECTOR NAME	PRINCIPAL INSPECTOR TITLE
	
PRINCIPAL INSPECTOR SIGNATURE	DATE
FDEP	10/12/2011
ORGANIZATION	

Shannon Camp	Environmental Specialist III
INSPECTOR NAME	INSPECTOR TITLE
NO SIGNATURE	
INSPECTOR SIGNATURE	DATE
FDEP	
ORGANIZATION	

Richard Dillen	Quality Assurance Officer
REPRESENTATIVE NAME	REPRESENTATIVE TITLE
NO SIGNATURE	
REPRESENTATIVE SIGNATURE	DATE
HOWCO Environmental Services	
ORGANIZATION	

Lee Morris	Director of Operations
REPRESENTATIVE NAME	REPRESENTATIVE TITLE
NO SIGNATURE	
REPRESENTATIVE SIGNATURE	DATE
HOWCO Environmental Services	
ORGANIZATION	

NOTE: By signing this document, the Site Representative only acknowledges receipt of this Inspection Report and is not admitting to the accuracy of any of the items identified by the Department as "Potential Violations" or areas of concern.

Coogle, Deon

From: Microsoft Exchange
To: 'thagan@howcousa.com'; 'leemorris@howcousa.com'
Sent: Thursday, October 13, 2011 11:50 AM
Subject: Relayed: HOWCO Environmental Services - Inspection Letter

Delivery to these recipients or distribution lists is complete, but delivery notification was not sent by the destination:

'thagan@howcousa.com'

'leemorris@howcousa.com'

Subject: HOWCO Environmental Services - Inspection Letter

Sent by Microsoft Exchange Server 2007

From: Microsoft Exchange
To: 'gquinn@pinellascounty.org'
Sent: Thursday, October 13, 2011 11:50 AM
Subject: Relayed: HOWCO Environmental Services - Inspection Letter

Delivery to these recipients or distribution lists is complete, but delivery notification was not sent by the destination:

'gquinn@pinellascounty.org'

Subject: HOWCO Environmental Services - Inspection Letter

Sent by Microsoft Exchange Server 2007

Memorandum

Environmental Protection

SOUTHWEST DISTRICT ENFORCEMENT COVER MEMO

TO:  James Dregne, Hazardous Waste Program Manager *idz*

FROM:  Kelly Honey, Environmental Specialist III

DATE: October 12, 2011

FILE NAME: **HOWCO Environmental Services**

COUNTY: Pinellas

PROGRAM: Hazardous Waste

PROJECT # N/A

TYPE OF DOCUMENT: **Inspection Report and Cover Letter**

REQUESTED ACTION: **APPROVAL**

DESCRIPTION OF VIOLATIONS:
N/A

STATUS OF CORRECTIVE ACTIONS:
N/A

STATUS OF PENALTY ASSESSMENT:
N/A

PENALTY: ☒ Not Applicable

Amount: N/A

Costs & Expenses: N/A

Total: N/A

Secretary Approval ☒ Not required / Approved on _____

Attachments: Inspection Report and Cover Letter