

Honey, Kelly

From: Honey, Kelly
Sent: Thursday, December 24, 2009 3:10 PM
To: Dregne, James
Cc: Knauss, Elizabeth
Subject: RE: Howco 8624557

Jim,

I just responded to Randy, but I there was an issue unrelated to the Tanks program I wanted to raise. I can't find anything in HOWCO's permit that allows them to blend off-spec fuels from offsite (or any fuel) as part of their used oil processing. The permit states that they will process the used oil either by distillation or chemical separation, and the only mention of adding anything is "demulsification chemical may be injected and mixed into the used oil." The only mention of blending is that the recovered "light ends are blended into processed used oil tanks during batch processing."

So I think they may be in violation of their permit.

I just wanted to bring it up before I went on leave and forgot all about it. I copied Beth on everything in case Randy has questions or whatever, someone else here will know what he's talking about...

See you in a couple of weeks!

-kelly

From: Dregne, James
Sent: Thursday, December 24, 2009 11:47 AM
To: Honey, Kelly
Subject: Fw: Howco 8624557

Fya

From: Randall_Strauss@doh.state.fl.us
To: Culbreth, Laurel
Cc: Dregne, James; Meetze, Alison; Joseph_Sowers@doh.state.fl.us
Sent: Thu Dec 24 11:42:59 2009
Subject: Howco 8624557
Laurel,

I inspected Howco yesterday and discovered they are using 4 unlicensed tanker trailers to store petroleum products. One is storing off-spec Jet A that they intend to blend into their UO fuel and it is not in containment. The other three are in the used oil filter/solid waste management area, which I believe the Used Oil program has accepted as meeting our secondary containment requirements. These contain respectively off-road diesel, a used oil/kerosene mixture, and light ends (~gasoline) from their cooker process. Ironically, they set-up the off-road diesel tanker to fuel their plant equipment, after they discontinued the use of the DW tank they were using for this purpose due to our enf case.

Anyway, I told the plant manager, Lee Morris, and Richard Dillen, the lab manager, that I interpret the trailers to be stationary storage tanks that can not meet our requirements and they need to discontinue their use immediately. I also told them they will have to do a closure assessment for the trailer that is not in containment, ala Lancaster Oil, but not for the other three, if we can confirm that the filter management area is considered secondary containment. Let me know if this approach sounds good.