

Jeb Bush
Governor

Department of Environmental Protection

South District
P.O. Box 2549
Fort Myers, Florida 33902-2549

Colleen M. Castille
Secretary

October 13, 2005

CERTIFIED MAIL NO. 7004 1160 0000 5510 8419
RETURN RECEIPT REQUESTED

FILE

Michael Wolfe
Howco Environmental Services
3701 Central Avenue
St. Petersburg, Florida 33713

RE: Lee County – HW
Howco Transfer Facility
2650-A Edison Avenue
Fort Myers, Florida 33715
Caloosahatchee to Lee Coast – EMA

Dear Mr. Wolfe:

A hazardous waste compliance evaluation inspection was conducted at your facility on October 5, 2005. This inspection was conducted under the authority of Section 403.091, Florida Statutes and Chapter 403, Part IV, Florida Statutes, and is designed to ascertain the compliance status of your facility with 40 CFR 260-273 and 279, adopted in Florida Administrative Code (F.A.C.) Chapters 62-730, 62-737 and 62-710.

Thank you for faxing the training records, facility registration and liability insurance certification to the Department on October 6 and 7, 2005. In order for the Department to complete our inspection of the facility at the address above, we still need Dave Thompson to contact us to set up a meeting to look over the driver's pickup records, driver's training manual, and respond to the items that need additional clarification listed below.

- According to **62-710.500(4) F.A.C. Rule**, each registered facility shall display the validated registration form and EPA identification number in a prominent place at the facility's location. Is the registration displayed on site? If so, where?
- According to **62-710.600(2)(c) F.A.C. Rule**, a training record shall be maintained in the company's operating record and the individual personnel files indicating the type of training received along with the dated signature of those receiving and providing training. **These records shall be retained for a minimum of three years and available for review by Department personnel during inspections.**

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Howco Environmental Services

October 13, 2005

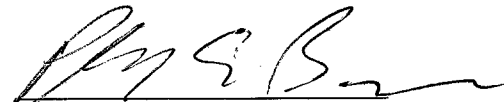
Page 2 of 2

- The Department received a fax of all the training the three drivers accomplished in January 14 and 17, 2005 by trainer Tim Morris. Does Tim Morris work for Howco? Is he certified to teach these classes? Did the drivers receive a certificate of completion? If so, please fax a copy of the certificates to the Department.
- The Department requests to review a driver's manual that is issued to a driver when hired. The Department requests to review drivers maintenance logs concerning the pick-up date, time, facility name, EPA ID number, how many drums were picked up, and the contents of the drums, and documentation of a halogen screening test.
- The Department requests to review the company's standard operating procedure for halogen screening according to **62-710.600 (2)(b)(3) F.A.C. Rule**.
- The Department would like to review backhaul manifests for October 2004 through October 2005.
- What is located inside the storage trailer on site?
- Where are the fluids backhauled to? What is done with the fluids once they reach the right destination?
- Is there a sensor system on each storage tank? Is the system and probes routinely inspected and maintained?

Please contact the department within seven days (7) of the date of this letter to set up a date and time to meet for review of the facility's records and address the issues stated above. Your response at the meeting will determine if an enforcement action, which could include a monetary penalty, is warranted. The civil penalty will be dependent upon the resolution of all non-compliance issues listed above.

If you have any questions, please feel free to call Charles Emery III or Karen Wilson at (239) 332-6975, extension 150 and 161 respectively or write to the letterhead address. Your cooperation in this matter is appreciated.

Sincerely,



Philip A. Barbaccia
Environmental Administrator

JMI/KW/red

3

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Sent To **MICHAEL WOLFE**
 Street, Apt. No., or PO Box No. **HOWCO ENV SVCS**
 City, State, ZIP+4 **3701 CENTRAL AVE**
ST PETERSBURG FL 33713

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- Print your name and address on the reverse so that we can return the card to you.
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MICHAEL WOLFE
HOWCO ENV SVCS
3701 CENTRAL AVE
ST PETERSBURG FL 33713

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