



Florida Department of Environmental Protection

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2600 Blair Stone Road
Tallahassee, Florida 32399-2400

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Governor

Jennifer Carroll
Lt. Governor

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Secretary

February 27, 2012

ELECTRONIC MAIL
thagan@howcousa.com

Mr. Tim Hagan, President/CEO
Howco Environmental Services
3701 Central Ave.
St. Petersburg, Florida 33713

Dear Mr. Hagan:

Thank you for contacting the Florida Department of Environmental Protection. The Department has reviewed your proposal outlined in your January 9, 2012 letter requesting regulatory guidance on Howco's Environmental Services parts washer program. Specifically Howco would like to offer their customers parts washer equipment with high flash (over 140F) solvent. Howco has proposed a waste management plan for their customers that would help ensure that no hazardous waste parts washing fluid is mixed with used oil.

Even though Howco's parts washer fluid product may not be hazardous waste for its ignitability characteristic, the parts washer fluid may have picked up additional constituents such as heavy metals or chlorinated solvents. These constituents, when mixed with the high flash solvent, may make the entire spent parts washer fluid a hazardous waste when disposed. It is the generator's responsibility to determine if their wastes are hazardous waste and, if so, must manage them as hazardous waste. A generator of hazardous waste who does not generate more than 220 pounds per month from all waste streams may mix used solvents with used oil (40 CFR 279.10 (b)). However, in Florida, any substances mixed with used oil which would render the used oil unsuitable for recycling or beneficial use is prohibited (F.S.403.751 and 62-710.401).

Please keep in mind that generators must have sufficient information to make an accurate hazardous waste determination. Hazardous waste streams cannot be characterized solely according to the type of facility. If the generator uses process knowledge in making a hazardous waste determination, FDEP recommends a representative sample analysis be conducted periodically. A onetime analysis to support generator knowledge is not sufficient. If there is a change in the process a new waste determination must be made immediately.

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Although it is the generator's responsibility to identify their hazardous waste, it would be in the transporter's best interest to have a generator claiming their used oil has not been mixed with hazardous waste to sign a certification stating that fact when the transporter picks up used oil.

The guidance provided in this letter applies to generator responsibilities. As a used oil transporter/processor you should contact Mr. Bheem Kothur of the Department's Used Oil Permitting group to (850-245-8781) determine if Howco's proposed part washer program would require modifications to your permit as a used oil processor.

If you have any questions please contact Mr. John Erickson at 850-245-8707.

Sincerely,



Glen Perrigan
Hazardous Waste Regulation Section

cc. Richard Dillen, Howco Environmental Services
James Dregne, FDEP SW District
Karen Bayly, FDEP South District
Janine Kraemer, FDEP Central District
Karen Kantor, FDEP SE District
Vicky Valade, FDEP NE District
James Byer, FDEP NW District
Tony Tripp, FDEP Tallahassee
Bheem Kothur, FDEP Tallahassee
Tim Bahr, FDEP Tallahassee



Mr. Glen Perrigan

Florida Dept. of Env. Protection

2600 Blair Stone Rd.

Tallahassee, FL 32399-2400

Re: Parts Washer Management

Mr. Perrigan:

In reference to our telephone conversation on January 6th, HOWCO Env. Services would like to offer its customers a parts washer program to keep up with the competitive market.

It is HOWCO's intention to provide the equipment and a virgin high flash (over 140F) parts washer fluid out of its three locations (Astor, Ft. Myers and St. Petersburg) to customers and manage the used fluids through its processing facilities in Astor and St. Petersburg.

Under current State rule, CE-SQG's will be allowed to mix the used parts washer fluid with used oil.

For SQG's and LQG's HOWCO would, at initial setup, provide the customer with a waste management plan under the following conditions:

- 1) HOWCO requires the generator to submit a signed Waste Material Profile sheet.
- 2) HOWCO requires the generator to submit a signed statement that the used parts washer fluid has not been co-mingled with other wastes.
- 3) HOWCO requires the generator to have a one-time analysis done for Total Halogens, TCLP-Cadmium, TCLP-Chromium and TCLP-Lead, to support generator knowledge.

Only when these conditions are met, HOWCO will allow the generator to mix the used parts washer fluid with used oil.

HOWCO requests the Department's assistance in streamlining the waste management acceptance criteria for all its locations (Astor, Fort Myers, and Saint Petersburg) so that company-wide procedures can be followed.

Sincerely,

Tim Hagan

Persident/CEO

HOWCO Environmental Services.