



**Florida Department of  
Environmental Protection  
Hazardous Waste Inspection Report**

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**FACILITY INFORMATION:**

**Facility Name:** Howco Environmental Services

**On-Site Inspection Start Date:** 08/09/2012

**On-Site Inspection End Date:** 08/09/2012

**ME ID#:** 61495

**EPA ID#:** FL0001000611

**Facility Street Address:** 2650A Edison Ave, Fort Myers, Florida 33916-5306

**Contact Mailing Address:** 843 43rd St S, St Petersburg, Florida 33711-1922

**County Name:** Lee

**Contact Phone:** (813) 327-8467

**NOTIFIED AS:**

Non-Handler

Used Oil

**INSPECTION TYPE:**

Follow-Up Inspection for Used Oil Transporter facility

Follow-Up Inspection for Used Oil Transfer Facility

Follow-Up Inspection for Used Oil Generator facility

**INSPECTION PARTICIPANTS:**

**Principal Inspector:** Narrisa Pannell, Environmental Specialist II

**Other Participants:** George Morgan, Petroleum Recovery Specialist ; Mark Sautter, Environmental Specialist III

**LATITUDE / LONGITUDE:** Lat 26° 37' 59.1026" / Long 81° 51' 31.8512"

**SIC CODE:** 2911 - Manufacturing - petroleum refining

**TYPE OF OWNERSHIP:** Private

**Introduction:**

This is a follow-up inspection to the Hazardous Waste compliance evaluation inspection performed on 10/12/11. The facility was determined to be an used oil transfer/transporter facility. The facility generates used oil absorbent material. Used oil, used oil filters, used antifreeze, used oil absorbent material is removed from generators and transported to their main facility in St. Petersburg, Florida (EPA ID No. FLD152764767).

**Process Description:**

The purpose of the inspection was reviewed with George Morgan, Petroleum Recovery Specialist. Mr. Morgan granted us access to the facility. The facility leases the property from Bruce & Candace Ryan, has operated at this location since 1991, utilizes 1 employee and is connected to city water and sewer. The primary operation of the facility is collecting and transporting used oil, used oil filters, petroleum contact water, used antifreeze, and used oil absorbent material.

40 CFR 279.46(a) & (b) Used Oil Tracking. (a) Acceptance. Used oil transporters must keep a record of each used oil shipment accepted for transport. Records for each shipment must include: (1) The name and address of the generator, transporter, or processor/re-refiner who provided the used oil for transport; (2) The EPA identification number (if applicable) of the generator, transporter, or processor/re-refiner who provided the used oil for transport; (3) The quantity of used oil accepted; (4) The date of acceptance; and (5)(i) Except as provided in paragraph (a)(5)(ii) of this section, the signature, dated upon receipt of the used oil, of a representative of the generator, transporter, or processor/re-refiner who provided the used oil for transport. (ii) Intermediate rail transporters are not required to sign the record of acceptance.

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(b) Deliveries. Used oil transporters must keep a record of each shipment of used oil that is delivered to another used oil transporter, or to a used oil burner, processor/re-refiner, or disposal facility. Records of each delivery must include: (1) The name and address of the receiving facility or transporter; (2) The EPA identification number of the receiving facility or transporter; (3) The quantity of used oil delivered; (4) The date of delivery; (5)(i) Except as provided in paragraph (a)(5)(ii) of this section, the signature, dated upon receipt of the used oil, of a representative of the generator, transporter, or processor/re-refiner who provided the used oil for transport. (ii) Intermediate rail transporters are not required to sign the record of acceptance.

At the time of the 10/12/11 inspection, the records provided by the facility did not meet the requirements listed above. The facility has recently switched to an electronic handheld printer to print manifests. The new system does not indicate the actual receiving facility but instead lists all 3 of the Howco Environmental Services locations. The facility notified the Department in the response to the pending violation that they are working to correct this and were instructed by the Department that the following information should be clearly indicated on the receipts: generator ID; transporter ID; The EPA identification number of the receiving facility or transporter as well as the name and address of the receiving facility or transporter; amount of used oil delivered; receipt date; and receiving transporter's signature.

The original inspection citing the violation was provided to Mr. Morgan during the follow-inspection as well as copies of the facility's corrective actions and the Department's responses.

F.A.C. Rule 62-710.850 Used Oil Filter Prohibition. The general requirements for the storage of used oil filters is as follows: All persons storing used oil filters shall store used oil filters in above ground containers which are clearly labeled "Used Oil Filters," and which are in good condition (no severe rusting, apparent structural defects or deterioration) with no visible oil leakage. The containers shall be sealed or otherwise protected from weather and stored on an oil-impermeable surface.

The facility coated the floor of the semi trailer utilized to store the 55-gallon drum managing the used oil filter with an oil impermeable sealant.

40 CFR 279.22 Response to Releases, upon detection of a release of used oil to the environment, a generator must perform the following cleanup steps: (1) stop the releases (2) contain the released used oil (3) clean up and manage properly the released used oil and other materials (4) if necessary, repair or replace any leaking used oil storage containers or tanks prior to returning them to service.

Used oil discharges had been cleaned up and the contaminated media had been properly disposed.

40 CFR 279.45(e)(2) Used Oil Tank Containment Area. The entire containment system, including walls and floors, must be sufficiently impervious to used oil to prevent any used oil release into the containment system from migrating out of the system to the soil, groundwater, or surface water.

The containment structure for the used oil tanks was re-coated with an oil impermeable sealant.

F.A.C. Rule 62-710.510 Record Keeping and Reporting. (1) Each registered person shall maintain records on DEP Form 62-710.901(2) or on substantially equivalent forms which contain at least the same information as the Department form. These records shall include the following information: (a) The name, business address, telephone number and EPA identification number of the transporter; (b) The source of the used oil, including the name and street address of each source, and the EPA identification number of the source if the generator has one; (c) The total number of gallons of used oil received from each source, including any oily wastes which may be an integral part of the used oil shipment; (d) The type of used oil received, using the type code designation found in the form instructions; (e) The date of receipt; (f) The destination or end use of used oil and oily wastes, including the name and street address of each destination or end user, the EPA identification number if applicable, and the end use code designation found in the form instructions; and (g) Documentation of halogen screening in accordance with the requirements of Rule 62-710.600, F.A.C. (2) Transporters shall maintain documentation of all shipments of used oil, including those accepted for transport as well as those refused due to suspected mixing with

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hazardous waste. A copy of this record shall be left with the generator. (3) A generator of used oil that transports only its own used oil generated at its own noncontiguous operations to its own central collection facility for storage prior to having its used oil picked up by a certified used oil transporter is not subject to the record keeping and reporting requirements of this section. (4) The records required by this section shall be retained for a period of three years. The records shall be kept at the street address of the registered person and shall be available for inspection by the Department during normal business hours, unless another location and inspection schedule is specified in the registration package submitted to the Department. (5) No later than March 1 of each year, each person required to register in accordance with Rule 62-710.500, F.A.C., shall submit an annual report for the preceding calendar year to the Department on DEP Form 62-710.901(3). The report shall summarize the records kept pursuant to this section. (6) No later than July 1 of each year, each public used oil collection center shall submit to the Department an estimate of the quantity of used oil accepted from the public during the previous calendar year. The Department shall advise each public used oil collection center of this requirement by June 1 of each year.

At the time of the 10/12/11 inspection, the records provided by the facility did not meet the requirements listed above. The facility has notified the Department in the response to the pending violation that they are working to correct this and were instructed by the Department that the following information should be clearly documented on their records: name, business address, telephone number and EPA identification number of the transporter; the source of the used oil, including the name and street address of each source, and the EPA identification number of the source if the generator has one; the type of used oil received, using the type code designation found in the form instructions; the date of receipt; the destination or end use of used oil and oily wastes, including the name and street address of each destination or end user, the EPA identification number if applicable, and the end use code designation found in the form instructions; documentation of halogen screening in accordance with the requirements of Rule 62-710.600, F.A.C; and documentation of all shipments of used oil, including those accepted for transport as well as those refused due to suspected mixing with hazardous waste. A copy of this record shall be left with the generator. The records required by this section shall be retained for a period of three years. The records shall be kept at the street address of the registered person and shall be available for inspection by the Department during normal business hours, unless another location and inspection schedule is specified in the registration package submitted to the Department.

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**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.

Narrisa Pannell

**PRINCIPAL INSPECTOR NAME**

Environmental Specialist II

**PRINCIPAL INSPECTOR TITLE****PRINCIPAL INSPECTOR SIGNATURE**

FDEP

**ORGANIZATION**

8/14/2012

**DATE****Supervisor:** Narrisa Pannell

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.