



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

FACILITY INFORMATION:

Facility Name: HOWCO Environmental Services

On-Site Inspection Start Date: 08/10/2012

On-Site Inspection End Date: 09/05/2012

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:

CESQG (<100 kg/month)

Used Oil

INSPECTION TYPE:

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

Routine Inspection for Used Oil Processor facility

Routine Inspection for Used Oil Marketer facility

Routine Inspection for Used Oil Generator facility

Routine Inspection for Used Oil Transporter facility

INSPECTION PARTICIPANTS:

Principal Inspector: Kelly M. Honey, Environmental Specialist III

Other Participants: 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 inspector was accompanied throughout by Richard Dillen, who manages the Laboratory, with additional assistance provided by Lee Morris, who manages the Yard. The facility was most recently inspected by the Department's Hazardous Waste Section on August 31, 2011. 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). 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. The facility was in the process of resurfacing the solid waste processing pad and recoating the whole area on the south side of the facility comprised of the drum washing area, the used oil filter processing area and the solid waste processing pad. HOWCO now has 48 aboveground storage tanks (ASTs), storing petroleum contact

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water (PCW), used oil, etc. The emergency address system (i.e., the bullhorn) was not operable at the time of the inspection. This has since been corrected. The fire and emergency equipment are inspected monthly and tested annually.

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. In the used oil filter processing area, there were approximately 72 drums of used oil filters, all of which were labeled and protected from the weather.

At the time of the inspection, there was one roll-off on the solid waste processing pad, and several that were being stored on the east side of the facility while the pad was being resurfaced. In accordance with the permit, all solid waste received at the facility must be stored on an impervious surface. After the inspection, the roll-offs were relocated. The solid waste storage pad no longer has steel plates covering the top. The pad appears to be constructed on concrete and has been coated, but the coating was already scrapped off under the single roll-off placed on it. The Department recommends replacement of the steel plates as soon as possible to prevent equipment from removing the impervious coating. It is unknown whether the concrete is lined underneath.

Solid waste managed at the facility includes oily solid waste generated by HOWCO and its customers. The WTU sludge and the oil-extracted sludge generated at the facility is analyzed annually. The wastewater treatment sludge was last sampled June 6, 2012, and the oil-extracted sludge was sampled on July 20, 2012. Results indicate that both waste streams are nonhazardous. Solid waste is either sent to a landfill or to the waste-to-energy incinerator. HOWCO appears to be 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.

Records were reviewed and found to be complete and up to date with the following exception. The latest revision of the contingency plan was not sent to required entities, such as the police fire departments. The revised plan has since been sent out. As noted in the previous inspection, HOWCO has switched to an electronic record keeping system that is used company wide. The acceptance and delivery records listed all three HOWCO transporter facilities and their EPA ID numbers on the records, but there was no indication which actually transported the used oil. During the records review, it was noted that records generated after May 2012 now indicate which HOWCO facility transported the load. There are still some issues with some documentation associated with some pickups, such as waste profiles. HOWCO employees, including the designated emergency coordinators, received required training December 2011.

New Potential Violations and Areas of Concern:

Violations

Type: Violation

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Rule: 279.52(a)(2)(i)

Explanation: The facility utilizes a bullhorn to meet this requirement. At the time of the inspection, the bullhorn did not work. (corrected)

Corrective Action: The batteries in the bullhorn were replaced, and the device is now operable.

Type: Violation

Rule: 279.52(b)(3)(ii)

Explanation: At the time of the inspection, the latest revision of the contingency plan had not been sent out to required entities. (corrected)

Corrective Action: After the inspection, the revised plan was sent to all previous recipients.

Type: Violation

Rule: 403.727(1)(c)

Explanation: At the time of the inspection, there were several roll-offs of solid waste being stored off the solid waste processing pad. (corrected)

Corrective Action: After the inspection, the roll-offs were relocated.

Areas of Concern

Type: Area Of Concern

Rule: 403.727(1)(c)

Explanation: The facility has moved to electronic record keeping. At the time of the inspection, there were two receipts for the pick up of solid waste oily absorbent material, but the waste profile for the material was not available through the electronic system.

Additionally, the solid waste processing pad no longer has steel plates protecting it from scrapes and damage from heavy equipment. There was already one scrape with the coating removed during the inspection. The Department is concerned that the pad will not remain impervious without the steel plates.

Corrective Action: HOWCO needs to improve its electronic record keeping system to ensure that it meets the requirements of the rule and its permit.

The Department recommends replacing the steel plates on the solid waste processing pad.

Conclusion:

Based on the observations made during this inspection, HOWCO was found to be out of compliance with rules governing used oil processors. The facility has since returned to compliance.

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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.

Kelly M. Honey

PRINCIPAL INSPECTOR NAME

Environmental Specialist III

PRINCIPAL INSPECTOR TITLE**PRINCIPAL INSPECTOR SIGNATURE**

FDEP

ORGANIZATION

9/14/2012

DATE**Supervisor:** James Dregne

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.