



Memorandum

Florida Department of Environmental Protection

CENTRAL DISTRICT

TO: HOWCO File, Lake Co.

THROUGH: Lu Burson, Environmental Manager 

FROM: Leah Proffitt, ES II 

DATE: December 16, 2003

SUBJECT: inspection

On November 25, 2003, I conducted an inspection of the HOWCO facility in Astor (formerly North Florida Oil), Lake County, accompanied by Christine Kirkpatrick and John Harris of CD Hazardous Waste. The inspection was to verify that no used oil processing is being conducted at the facility, since the permit expired in May 2003. Facility personnel assured inspectors that the only activities at the site involve the removal and refurbishing of tank systems, as well as remediation of contamination from North Florida Oil operations.

Upon returning to the office, I telephoned Tim Hagen with HOWCO in St. Petersburg to inquire whether any sludges had been removed from the old replaced tanks. He stated that there had been one shipment, and that he would fax a copy of the manifest. The manifest was received 12/15/03, and showed 3600 gallons of sludge had been shipped to the HOWCO St. Petersburg facility on 10/15/03.

In regards to the permit, Ms. Proffitt received a telephone call from HOWCO's consultant John Jones on 12/11/03. He stated that he was in contact with Bill Parker in Tallahassee, and inquired whether the facility would be allowed to store oil in the tanks without a permit. I advised him to consult with Mr. Parker, but added that in some instances, storage can be interpreted to include treatment/processing of used oil, since the tank's exposure to the sun causes an internal heat buildup that reduces the oil's water content.