

CARLTON FIELDS

ATTORNEYS AT LAW

ONE HARBOUR PLACE
777 S. HARBOUR ISLAND BOULEVARD
TAMPA, FLORIDA 33602-5799

MAILING ADDRESS:
P.O. BOX 3239, TAMPA, FL 33601-3239
TEL (813) 223-7000 FAX (813) 229-4133

January 26, 2001

Ms, Lou Burson
Florida Department of Environmental Protection
3319 McGuire Boulevard, Suite 232
Orlando, FL 32803-3767

**VIA FAX 407-893-3167
with copy by U.S. MAIL**

Re: Transfer of Permit HOTO-0027221-002

Dear Ms. Burson:

This letter is to advise you that the land owned by Steve C. Snedegar, Jr. on which Florida Oil/North Florida Oil formerly operated a used oil processing facility has been sold to Timco Real Estate Inc. effective December 29, 2000. The facility will be operated by HOWCO Environmental Services. Correspondence should be addressed to Art Anderson, HOWCO Environmental Services, 3701 Central Avenue North, St. Petersburg, Florida 33713. Phone 727-327-8467. Fax 727-323-2249. A revised tank registration form is being submitted under separate cover. Please call me at 813-229-4139 if you have any questions.

Yours sincerely,


Laure Lockett

cc: Mr. Art Anderson (HOWCO)

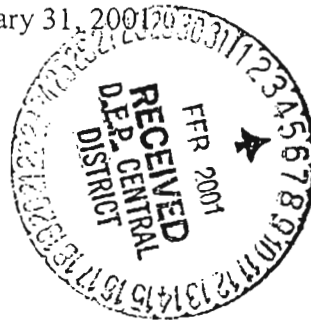
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January 31, 2001



Via Federal Express

Mr. Art Anderson
Howco Environmental Services
3701 Central Avenue North
St. Petersburg, FL 33713

Re: Florida Oil/Application for Transfer of Permit

Dear Art:

Enclosed is the Application for Transfer of Permit. Please have it executed in the presence of a Notary, attach the Assignment of Permits and Licenses to it, and forward both documents to:

Ms. Lu Burson
Florida Department of Environmental Protection - Central District
3319 Maguire Boulevard, Suite 232
Orlando, FL 32803-3767

with a copy to our office.

Should you have any questions concerning the enclosed, please give me a call at (813) 229-4139.

Yours sincerely,

Laurel Lockett /bl

Laurel Lockett

(Signed in her absence to avoid delay in mailing)

LL:bl
Enclosures



STATE OF FLORIDA
DEPARTMENT OF ENVIRONMENTAL PROTECTION
APPLICATION FOR TRANSFER OF PERMIT



Permit No. HO06-0027221 Date Issued _____ Date Expires 5/26/03

NOTIFICATION OF SALE OR LEGAL TRANSFER

Source Name: Florida Oil County: Lake
Source Location: 24133 State Road 40 City: Astor
Permittee Name: Steve C. Snedegar, Jr. Title: Owner
Mailing Address: 142 Cloverleaf Drive, St. George, SC 29474
(see attached Assignment of Permits)

The undersigned hereby notifies the department of the sale or legal transfer of this pollution source. He further agrees to assign his rights as permittee to the applicant in the event the department agrees to the transfer of permit.

Sworn to and subscribed before me at _____
County, _____ Signature of Permittee
this _____ day of _____ 19 _____ Title

Notary Public Date: _____
My Commission Expires: _____

REQUEST FOR TRANSFER OF PERMIT

Source Name: Florida Oil
Applicant Name: Howco Environmental Services Title: _____
Mailing Address: 3701 Central Avenue North
St. Petersburg, FL 33713 Telephone: (727) 327-8467
area _____
Project Engineer: Name: _____
Mailing Address: _____
Telephone: ()
area _____

The undersigned hereby notifies the department of his having acquired title to this pollution source. He further states that he has ex-

HO06-0027221

_____ the current permittee the basis on which Permit No. _____
_____ and states that they accurately and completely describe the permitted activity or project. He further
_____ apply with its terms and conditions, and agrees to assume the rights and liabilities
_____ the department of any future change in ownership of, or responsibility for, the
_____ project.

Subscribed before me

Howco Environmental

Arthur N. Andrews

Signature of Applicant*

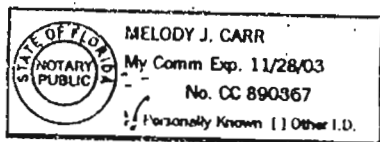
Executive Vice President / CFO

Title

Date: 02-01-2001

*Attach letter of authorization if other than owner or corporate officer.

DEP Form 62-1.201(1)



ASSIGNMENT OF PERMITS AND LICENCES

THIS ASSIGNMENT OF PERMITS AND LICENSES is made as of the 29th day of December, 2000, by STEVE C. SNEDEGAR, JR. d/b/a FLORIDA OIL ("Assignor"), to HOWCO ENVIRONMENTAL SERVICES ("Assignee").

Now, therefore, in consideration of the premises and the sum of Ten and 00/100 Dollars (\$10.00) and for good and valuable considerations paid by Assignee to Assignor, the receipt and sufficiency of which are hereby acknowledged the parties hereto agree as follows:

1. **PERMITS AND LICENSES.** Assignor is the holder of that certain Florida Department of Environmental Protection Permit No. HO06-0027221 EXP. 5/26/03 (the "Permit").

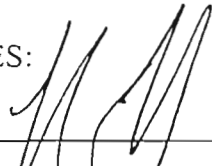
2. **ASSIGNMENT.** Assignor does hereby sell, assign and set over unto Assignee the Permits, and all the right, title and interest of the Assignor in and to the Permits, to have and to hold the same from the date hereof ("Assignment Date"); subject, however, to all the conditions, covenants, agreements, provisions, and terms contained in such Permits.

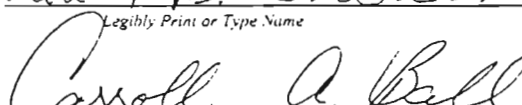
3. **ASSIGNOR COVENANTS.** Assignor covenants and agrees that the Permits are genuine and in full force and effect; that Assignor has good right to assign the Permits, subject only to those consents or other requirements required as described in such permits (the "Requirements"); that Assignor will use its best efforts to satisfy the Requirements to the Assignment; that the interest hereby assigned is free and clear from all encumbrances; that assignor has fully performed all the covenants and obligations on its part to be performed and observed under the Permits; and that Assignor has not done, or permitted, any acts in violation of any of the covenants, provisions or terms thereof.

4. **FURTHER ASSURANCES.** Assignor agrees that it will sign any additional documents, notices, certificates, bills of sale, assignments or other instruments required or necessary under law or otherwise to effectuate the provisions or intent of this Agreement.

IN WITNESS WHEREOF, the Assignor has executed this Agreement on the date first above shown.

WITNESSES:

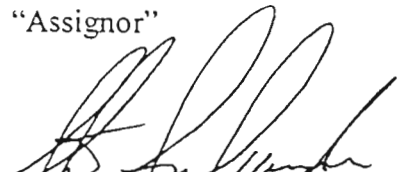


Laurel E. Chocteh
Legibly Print or Type Name


Carroll A. Ball

CARROLL A. BALL
Legibly Print or Type Name

"Assignor"



STEVE C. SNEDEGAR, JR. d/b/a
FLORIDA OIL



January 22, 2001

Lu Burson
Environmental Specialist II
Florida Department of Environmental Protection
3319 Maguire Boulevard, Suite 232
Orlando, Florida 32803-3767

Re: North Florida Oil Facility – Permit Transfer and Site Assessment

Dear Lu,

In response to your letter of January 16, and subsequent conversation with Danny Christensen regarding the above-referenced facility, HOWCO hereby proposes the following:

1. Utilizing three (3) of the existing Temporary Monitoring Wells installed at the site, HOWCO will determine the direction of groundwater flow beneath the site.
2. Pending approval of the location of the above three (3) wells by the Department, HOWCO will convert these wells to Permanent Wells, to be used to monitor groundwater quality upgradient, downgradient and near the identified source of contamination.
3. HOWCO will apply for transfer of Florida Oil's Used Oil Processing permit with modifications as soon as all design and engineering work for said modifications is completed.

If acceptable, please forward confirmation to my attention at your earliest convenience. We appreciate the cooperation and assistance of your department.

Sincerely,
Tony L. Tripi
Tony Tripi
HOWCO Environmental Services



Jeb Bush
Governor

Department of Environmental Protection

Central District
3319 Maguire Boulevard, Suite 232
Orlando, Florida 32803-3767

David B. Struhs
Secretary

January 16, 2001

CERTIFIED MAIL

7099 3400 0010 0518 2890

Attention: Tony Tripi
HOWCO Environmental Services
456 Cypress Road
Ocala, Florida 34472

OCD-HW/C-01-0005

Lake County – HW
North Florida Oil Facility
Permit transfer and site assessment

Dear Mr. ^{Tony}Tripi:

Thank you for taking the time to meet with us last Friday to discuss HOWCO's plans for the newly purchased Florida Oil facility in Astor. The following is a short summary of the action items discussed.

- HOWCO will revise current sampling data to reflect the appropriate standards and contaminate levels. A copy of the appropriate standards was provided during the meeting. A revised copy will be sent to the Department.
- HOWCO is planning to begin removal of petroleum contaminated soils located along the northern property boundary at soil sample 3N. The area to be excavated is approximately 70'X80' and will be screened visually and using an OVA. Confirming soil samples will be collected to verify and document that the source has been adequately removed.
- HOWCO will establish permanent monitoring wells where exceedances have occurred in the areas of TW3 and TW5. These wells will be installed along with a third monitoring well in a manner that will allow for determination of groundwater flow. A proposal for well locations will be sent to the Department for approval prior to installation.
- The Department will provide information to HOWCO on the transfer of Florida Oil's Used Oil Processing permit.

Please let me know if I have missed any points. Send all requests and information to my attention. I may be reached at 407-893-3323.

Sincerely,

Lu Burson
Environmental Specialist II
Hazardous Waste

lb

cc: Deborah Helle, DEP Petroleum Cleanup
Robert T. Snyder, P.E., DEP Hazardous Waste

"More Protection, Less Process"

Printed on recycled paper.