



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

FACILITY INFORMATION:

Facility Name: HOWCO Environmental Services

On-Site Inspection Start Date: 01/23/2013

On-Site Inspection End Date: 01/23/2013

ME ID#: 63050

EPA ID#: FLD101828689

Facility Street Address: 24133 State Road 40, Astor, Florida 32102-3031

Contact Mailing Address: 3701 Central Ave, Saint Petersburg, Florida 33713-8338

County Name: Lake

Contact Phone: (727) 327-8467

NOTIFIED AS:

Non-Handler

Used Oil

INSPECTION TYPE:

Routine Inspection for Non-Handler facility

Routine Inspection for Used Oil facility

INSPECTION PARTICIPANTS:

Principal Inspector: Danielle Owens, Environmental Specialist

Other Participants: Danielle Bentzen, Environmental Specialist; Dan Medici, Supervisor

LATITUDE / LONGITUDE: Lat 29° 9' 46.3142" / Long 81° 32' 26.2423"

SIC CODE: 2911 - Manufacturing - petroleum refining

TYPE OF OWNERSHIP: Private

Introduction:

On January 23, 2013, Danielle Owens and Danielle Bentzen, Florida Department of Environmental Protection (FDEP), conducted a routine inspection of HOWCO Environmental Services (HOWCO), located at 24133 State Road 40, Astor, Florida for compliance with used oil and used oil filter regulations. Dan Medici, HOWCO Astor Plant Manager, accompanied the inspectors.

HOWCO operates under Used Oil Processing Facility permit number 27221-HO-004, issued on 07/08/2011. The permit will expire on 08/25/2015. HOWCO is a registered Used Oil Transporter, Transfer Facility, Processor, Marketer, Filter Transporter, Filter Transfer Facility and Filter Processor.

The company is headquartered in St. Petersburg, Florida. The St. Petersburg facility is a registered used oil transporter and processor, as well as a used oil filter transporter and processor. Prior to HOWCO beginning operations at this site, North Florida Oil was operating as a used oil and used oil filter transporter and processor at this location. HOWCO took over the operations in 2000. The facility is connected to the City of Astor sewer and water systems. The facility has four employees on site.

INSPECTION HISTORY

On March 21, 2012, HOWCO was inspected and found to be out of compliance. Violations noted included: Failure to maintain a copy of the contingency plan at the facility, failure to have at least one employee on the premises or on call to respond to an emergency, failure to keep a copy of the written analysis plan at the facility, failure to keep the current year's record of each used oil shipment accepted for processing/re-refining at the facility, failure to comply with the requirements of its permit, and failure to display the validated registration form and identification number in a prominent place at the facility. The facility has not been responsive in resolving this case, and as of the date of this report, the case is unresolved.

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On August 11, 2010, HOWCO was inspected and found to be out of compliance. Violations noted included: failure to conduct monthly inspections. The corrective actions were completed and the case was closed without formal enforcement.

On October 16, 2007, HOWCO was inspected and found to be out of compliance. Violations noted included: failure to make required arrangements with local authorities; and failure to document the EPA identification number of the source of the used oil. The violations were resolved with a Short Form Consent Order, OGC number 08-0163, executed on April 10, 2008. Resolution included payment of \$3,000.00 in civil penalties.

On August 25, 2006 HOWCO was inspected and found to be in compliance.

On February 5, 2004 HOWCO was inspected and found to be in compliance.

On November 25, 2003 HOWCO was inspected and found to be in compliance.

Process Description:

HOWCO transports used oil, used oil filters, non-hazardous sludges, antifreeze, absorbents and miscellaneous oily wastes to their facility in Astor from various locations throughout Florida. The Astor facility acts as a transfer location for consolidation of wastes shipped to the HOWCO facility in St. Petersburg.

Used oil filters are not off-loaded at the Astor facility. They are transferred from one truck to a semi tractor trailer and taken to the St. Petersburg facility once a week. Used oil filters are ultimately taken to U.S. Foundry in Miami. Antifreeze, consolidated at the St. Petersburg facility, is shipped to EcoFreeze in Georgia for recycling. Absorbents, i.e. kitty litter or saw dust, and grease are taken to the Okeechobee Landfill. The solid waste incinerator in Pinellas County receives the absorbent pads, booms, and paper filters.

When a truck returns to the facility, a composite sample is pulled before the oil is off-loaded for storage. The composite sample is again screened for halogens and distilled to determine water content. Loads are bulked for shipment to HOWCO, St. Petersburg. At the time of the inspection HOWCO had eleven above ground storage tanks (AST) located on a concrete pad surrounded by a concrete wall (Figure 1).

Tank Farm

Tank #1 - contained petroleum product water, but was labeled water.

Tank #2 - was labeled 'used oil' and was empty at the time of the inspection

Tank #3 - was labeled and contained used oil

Tank #4 - contain Petroleum Product Water

Tank #5 - was labeled and contained used oil

Tank #6 - contained used antifreeze and had a used antifreeze label on it that was peeling off revealing the tank was previously labeled "used oil" (Figure 1). The inspectors recommended the facility reapply the used antifreeze label.

Tank #8 - was out of service at the time of the inspection

Tank #9 - was labeled 'used oil' and was empty at the time of the inspection

Tank #10 - was out of service at the time of the inspection

Tank #11 - cooker tanks

Tanks #12 and #13 - flow through tanks

HOWCO's permit allows for the contents of the tanks to change from time-to-time based on current market conditions, however, all tanks are to be provided with the appropriate marking/placarding.

Fire extinguishers and spill equipment were located next to the containment area. A&A Fire & Safety Inc checks fire extinguishers on an annual basis. For on-site communication, each employee is equipped with a cellular telephone. A direct alarm for the building security is through ADT.

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The used oil processing operation has been temporarily halted due to the burner being out of service since September 2012. All processing is currently being conducted at the St. Petersburg facility.

Next to the tank farm was an empty tanker truck.

Inspection of the tanker loading/off-loading area found the area to be clean with no visible releases. The tank farm was dry with no visible releases. Along one wall of the tank farm were seven 55-gallon drums (Figure 2). One drum contained "Oily Trash." The oily trash is debris generated by yard operations. The remaining drums were as follows: One drum of "New Absorbent"; One drum of "Oily Pads"; One drum of "Used Oil"; Two drums of "Used Absorbents" and one drum that contained oil collected from the oil transfer hose. The hose is allowed to drain into the drum, preventing releases to the ground.

Located on the corner of the property was a condenser that is to be installed at a later date. The condenser will eventually take the place of the emulsifier.

Parking & Equipment Storage Area

The area contained a semi truck trailer with an empty drums (Figure 3) and trailer full of used oil filters to be taken to the St. Petersburg facility (all drums appeared to be labeled) (Figure 4).

Maintenance Shop

Minor vehicle maintenance work is done on the property. Used oil and antifreeze generated on-site accumulates in 55-gallon drums, one for used oil and one for antifreeze. Each drum is stored within an overpack container on a concrete pad (Figures 5). The drums were properly labeled and managed.

Inside the maintenance area was a small quality lab used for testing the flash point of processed oil.

Outside the maintenance shop was a sink used for hand washing. The sink has been connected to the sanitary sewer (Figure 6 and 7).

RECORD REVIEW

A copy of the validated registration form was displayed in a prominent place at the facility.

A copy of the written analysis plan describing the procedures that will be used to comply with the analysis requirement of 40 CFR 279.53 was available for review at the time of the inspection as required by Specific Condition, Part I, Number 45.

Records documenting monthly inspections performed in accordance with paragraph 62-762.641(2)(e), F.A.C. were available for review at the time of the inspection.

Records documenting the current year acceptance of used oil shipments were not available for review at the time of the inspection. The records are kept electronically and sent directly to the St. Pete office. Specific Conditions, Part II, Number 1(c), allows HOWCO to maintain shipment acceptance records at the Permittee's corporate headquarters in St. Petersburg except the current years records must be kept at the facility [40 CFR 279.56(a) and 62-710.800(2), F.A.C./Specific Condition, Part II, Number 1(c)/ 403.161(1)(b), F.S.].

Analytical results for processed oil shipped off-site to burners were not available for review at the time of the inspection [40 CFR 279.72].

These two violations were initially noted in the March 21, 2012 inspection. In HOWCO's response on July 16, 2012 to the Department this was to be/had been corrected. At the time of this inspection, Mr. Medici indicated he had not been trained to access any of the records electronically.

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New Potential Violations and Areas of Concern:**Violations**

Type: Violation

Rule: 279.56(a)

Explanation: Acceptance. Used oil processors/re-refiners must keep a record of each used oil shipment accepted for processing/re-refining. These records may take the form of a log, invoice, manifest, bill of lading or other shipping documents. Specifically, HOWCO failed to keep the current years records of acceptance of used oil shipments. This violation was noted in the March 21, 2012 inspection.

Corrective Action: HOWCO shall keep the current year's record of each used oil shipment accepted for processing/re-refining at the facility.

Provide documentation of the current year's used oil shipment records to the Department with 30 days of the date of your receipt of this report.

Type: Violation

Rule: 279.72(a), 279.72(b)

Explanation: Analysis of used oil fuel. A generator, transporter, processor/re-refiner, or burner may determine that used oil that is to be burned for energy recovery meets the fuel specifications of 279.11 by performing analyses or obtaining copies of analyses or other information documenting that the used oil fuel meets the specifications. A generator, transporter, processor/re-refiner, or burner who first claims that used oil that is to be burned for energy recovery meets the specifications for used oil fuel under 279.11, must keep copies of analyses of the used oil (or other information used to make the determination) for three years. Specifically, HOWCO failed provide analytical results for processed oil shipped off-site to burners. This violation was noted in the March 21, 2012 inspection.

Corrective Action: HOWCO shall keep analytical results for processed oil shipped off-site to burners.

Provide documentation of the analytical results for processed oil shipped off-site to burners to the Department with 30 days of the date of your receipt of this report.

PHOTO ATTACHMENTS:

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Fig 1: Tank Farm



Fig 2: Drums on Load Pad



Fig 3: Trailer w/Empty Drums



Fig 4: Trailer w/Filters



Fig 5: Overpacks



Fig 6: Sink



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Fig 7: Sink Connection



Conclusion:

HOWCO is a registered Used Oil Transporter, Transfer Facility, Processor, Marketer, Filter Transporter, Filter Transfer Facility and Filter Processor and was not in compliance at the time of inspection.

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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.

Danielle Owens**PRINCIPAL INSPECTOR NAME**Environmental Specialist**PRINCIPAL INSPECTOR TITLE**FDEP**ORGANIZATION****Supervisor:**Janine Kraemer

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.