

CERTIFIED MAIL  
RETURN RECEIPT REQUESTED



CITY OF ST. PETERSBURG

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BUREAU OF  
WASTE MANAGEMENT

August 24, 1988

Mr. Tim Hagan  
President  
HOWCO

843 43rd Street South  
St. Petersburg, Florida 33711

RE: Notice of Violation of Wastewater Discharge  
Permit #SPFL-5093-86-32.

FLD152764767

Dear Mr. Hagan:

It is the responsibility of each permitted St. Petersburg business to monitor and take necessary action to insure that wastewater from their operation does not adversely impact the receiving sewage treatment plant.

This letter is to formally inform you that Howco has been found to be in serious violation of its wastewater discharge permit in the following manner.

The self monitoring report for May 1988 indicated 188 mg/l oil and grease and 6.0 mg/l phenol in your discharge. The limits for these parameters are 100 mg/l and 5.0 mg/l respectively.

Following these violations, the City of St. Petersburg began unscheduled monitoring of Howco's wastewater discharges beginning at 8:30 am on July 20, 1988. Under Section 28-54 (g) of St. Petersburg's City Code, you are directly responsible for all costs of unscheduled monitoring and you will be billed at the end of this investigation.

The following results were obtained:

A) METAL CONCENTRATIONS

At 8:50 am on July 20, 1988, the flow of the wastewater stream from Howco appeared to be less than permit limitations. At 9:00 am, an increase in flow of a blue colored effluent occurred. An Isco automatic sampler installed in the sewer took samples every 4 minutes and composited 4 successive samples in individual bottles throughout the rest of this day. The following analyses were carried out on these samples by the Water Quality Assessment Laboratory of the City of St. Petersburg.

Mr. Tim Hagan  
President  
August 24, 1988  
Page 2

TIME	9.02	10.00	11.10	12.14	13.18	14.22	15.26
Cadmium	0.05*	0.008	0.008	0.01	0.008	0.005	0.005
Chromium	1.10	0.08	0.08	0.08	0.08	0.08	0.08
<u>Copper</u>	<u>7300</u>	<u>290</u>	<u>12.3</u>	<u>9.0</u>	<u>16.3</u>	<u>48.0</u>	<u>729</u>
<u>Lead</u>	<u>8.7</u>	0.3	0.2	0.2	0.08	0.08	0.3
Nickel	0.91	0.51	0.53	0.58	0.53	0.39	0.24
<u>Zinc</u>	<u>15.0</u>	1.24	0.59	1.17	0.21	0.50	4.07

\*Concentrations of all samples are in mg/l.

A copy of your wastewater discharge permit is enclosed. This permit defines daily maximum limits for copper (4.5 mg/l), lead (0.7 mg/l) and zinc (4.2 mg/l). The above results indicate excessive copper violations throughout the day and lead and zinc violations in the 9:02 am sample.

On July 21, 1988, a composite sample for the whole working day indicated a copper violation of 5.7 mg/l.

On August 10, 1988, a composite sample for the working day indicated copper levels of 20.6 mg/l and zinc levels of 54.6 mg/l.

A composite sample taken from 4:05 pm on August 11, 1988 until 9:53 am on August 12, 1988, contained 20.5 mg/l copper and 7.5 mg/l zinc.

A serious increase in copper levels has recently occurred in the sludge at the Southwest Wastewater Treatment Plant which receives your wastestream. This increase has resulted in a grade II sludge rating at this plant which has caused restrictions in sludge disposal.

#### B) OIL AND GREASE

On July 21 and 22, 1988, composite samples were analyzed for oil and grease content and results were within permit limits.

On July 26, 1988, at 9:40 am, a grab sample of Howco wastewater was analyzed for oil and grease and found to be within permit limits (34 mg/l). A considerable increase in flow of an extremely oily discharge occurred at 12:25 pm on July 26, 1988. An analysis of a grab sample of this wastewater discharge indicated an oil and grease level of 737 mg/l. When the sampling crew left the area at 13:00 pm, this flow was continuing. Permit limits for oil and grease are 100 mg/l.

Oil and grease levels in a composite sample taken between 3:35 pm on August 10, 1988, and 9:15 am on the following day were 564 mg/l.

Discharges from 9:22 am until 3:55 pm on August 11, 1988 indicated oil and grease levels of 460 mg/l.

Mr. Tim Hagan  
President  
August 24, 1988  
Page 3

C) FLOW RATES

A flow meter connected to an 8 inch Palmer Bowlus flume was installed in your sewer line at 4:30 pm on August 12, 1988. Your discharge flow rates for the period from 8:00 am on Monday, August 15th to Friday, August 19th were read from continuous charts. Copies of parts of these charts are enclosed. These charts indicated that you were discharging batches of wastewater to the sanitary sewer at flow rates in excess of 100 gallons per minute for periods of up to 2 hours at a time, throughout this period. Your permit limit is 20 gallons per minute and your daily maximum discharge is 28,000 gallons.

Discharges of this magnitude containing excessive concentrations of metals and high oil and grease content upset the biological treatment process at the receiving wastewater treatment plant and can cause the facility to violate its NPDES operating permit. The quality of the reclaimed water is also affected, preventing it from being discharged into the distribution irrigation system.

D) UNAUTHORIZED DEVIATION FROM APPROVED DISCHARGE

The excessively high concentrations of copper and high lead and zinc levels in your wastewater over extended periods of time leads us to believe that these wastes originated from processes other than oil recycling for which you are permitted. The observed rapid fluctuations in your discharge flow rate and sudden increases in oil and grease levels suggest that not all of your wastewater is being uniformly treated prior to discharge to the sewers.

Copies of correspondence between Mr. Haijen and Mr. Gonzales of DER from March to July, 1988, indicate that you have been processing electroplating wastes for several months in addition to used oil recycling. You have not informed the City of this change in your operation, and thus, violated section A (2) of your permit. This constitutes grounds for revocation and other enforcement action by the City of St. Petersburg.

In view of the above serious violations, a conciliation meeting in accordance with St. Petersburg's City Code, Chapter 28.55 (c) between yourself and City officials has been scheduled for 9:30 am on September 2, 1988 at 1635 3rd Avenue North, St. Petersburg. At this meeting you will be asked to discuss and submit, in writing, responses to these violations. You should treat each violation as a separate offense and each and every day of violation as an offense.

You are advised to contact me as soon as possible if this date is not convenient.

Mr. Tim Hagan  
President  
August 24, 1988  
Page 4

Failure to appear at this meeting will result in the institution of such actions as the Director of Public Utilities deems advisable to ensure compliance with permit requirements. These requirements are included in, but not limited to, Sections 28.55 (d thru i) of the St. Petersburg City Code (copy enclosed).

Sincerely,



John R. Parnell, Ph.D.  
Industrial Pretreatment Coordinator  
Water Quality Assessment Division

JRP:lh  
Enclosures

xc: Albert B. Herndon, Chief, Pretreatment/O&M Unit, EPA/Atlanta  
Armando Gonzalez, Hazardous Waste Program, DER/Tampa  
Michael X. Redig, Hazardous Waste Section, DER/Tallahassee  
C. William Hargett, Deputy City Manager, Public Works  
William D. Johnson, Director, Department of Public Utilities  
A. Glenn Greer, Asst. Director, Department of Public Utilities  
Alfredo J. Crafa, Manager, Water Quality Assessment Division  
Janet L. Gifford, Attorney, Legal Section, City of St. Petersburg

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ISCO, INC.

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