

CERTIFIED MAIL  
RETURN REQUESTED



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CITY OF ST. PETERSBURG

September 21, 1988

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**RECEIVED**

SEP 27 1988

Mr. Tim Hagen  
Howco Environmental Services Ltd.  
843 43rd Street South.  
St. Petersburg, Fl 33711

FLD 152764767

HAZARDOUS WASTE  
PERMITTING

RE: Violation Status of Wastewater Discharge Permit SPFL-5093-86-32

Dear Mr Hagen:

This serves to acknowledge receipt of your letter of September 9, 1988 in response to our violation notice of August 24, 1988 and compliance requirement notice of September 2, 1988.

To date, continued monitoring of your discharge flow rate has confirmed your assurance to the City at the conciliation meeting that discharge rates would remain below 20 gallons per minute in compliance with your permit limit.

Although influent flow rates at the Southwest Wastewater Treatment Plant have been excessive in the past week due to the heavy rains, no incidence of any treatment upset has been recorded since Monday, August 30, 1988.

Other compliance requirements indicated in the notice of September 2, 1988 were deemed necessary to immediately protect the receiving wastewater treatment plant and were not intended to be negotiable. The City's wastewater treatment plants are designed to process domestic wastewater. Some of the reasons for establishing a pretreatment program are to ensure that highly variable industrial wastewater is converted as close as possible to the typical composition of domestic wastewater prior to discharge to the sanitary sewer.

Responses will be made to your requests in the same order as your letter.

The installation of the certified water meter and automatic sampler is acceptable to the City. The exact location of each of these units should be mutually agreed upon prior to their installation.

The City will require one month's LEL readings from an enclosed area of your sewer system to insure that the general provisions of City Ordinance 28-52 (b) 1 are not being violated. The level of volatiles in your June 9, 1988 scan was reported as, Benzene 1320 ug/l, Ethylbenzene 334 ug/l, Toluene 3540 ug/l, Total Xylene 1920 ug/l and Methyl Tert-Butyl Ether 7600 ug/l. In the May 17, 1988 scan, levels for these compounds were much higher than in June 1988. All of these

Mr. Tim Hagen  
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substances are specifically included as prohibited materials in the City Ordinance referred to above. The exact location where LEL monitoring will be required and the method to be used can be determined between Howco and the City when I visit your premises in the near future.

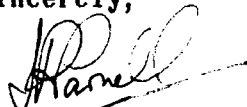
Grab sampling twice per day for COD analysis should begin as soon as possible. In the past 15 months, your self monitoring COD levels have exceeded 10,000 mg/l on 7 occasions and have only exceeded 20,000 mg/l once. As discussed at the conciliation meeting, the generally high and extremely variable level of COD in your effluent is of prime concern to the City. Processing this type of wastewater rapidly lowers the dissolved oxygen levels in the aerators at the treatment plant which severely interferes with the normal treatment process. Continuously maintaining high biomass in the aerators to minimize the effect of irregular high oxygen demand influents has significantly increased the costs of treatment to the City in the past 18 months. It is thus imperative that the oxygen demand of the effluent of all industrial users be monitored and controlled when found to have significant influence at the treatment plant. It is proposed that a review of the first two week's records be used to monitor the overall variation in your effluent COD levels. If these levels prove to be unacceptable to the City, you will be advised to confer with your consultant to determine how acceptable levels can be achieved.

The collection of samples for priority pollutant scans once every two weeks for a period of three months is acceptable to the City.

You will immediately be informed by phone if the Southwest Plant receives any malodorous slug influents in the future.

We appreciate your concerns for the prosperity of the City and sincerely hope that a mutually acceptable solution to this situation can be arrived at as soon as possible. If you have any further questions, please contact me at 893-7739.

Sincerely,



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

Encl.

cc. 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 ✓  
William C. Hargett, Deputy City Manager, Public Works  
William D. Johnson, Director, Department of Public Utilities  
Glenn Greer, Assistant Director, Department of Public Utilities  
Alfredo J. Crafa, Manager, Water Quality Assessment Division,  
Janet L. Gifford, Attorney, Legal Section, City of St. Petersburg

INDUSTRIAL PRETREATMENT CONCILIATION MEETING  
BETWEEN HOWCO ENVIRONMENTAL SERVICES, LTD.  
and the CITY OF ST. PETERSBURG

The meeting was brought to order at 9:30 a.m. September 2, 1988 by Mr. William Johnson, Director, Public Utilities. The attendees to the meeting included representatives from the City of St. Petersburg and Howco Environmental Services, Ltd. An attendee sheet is attached.

INTRODUCTION: Mr. William D. Johnson: Director, Public Utilities, City of St. Petersburg.

Mr. Johnson stated the problems incurred at the Southwest Wastewater Treatment Plant (#4) was due to a Slug that was believed to be discharged by Howco Environmental services. He added that the slug was backtracked by Dr. John Parnell and his staff to Howco Environmental. He also indicated the effects of the slug to the health of the employees at the Southwest plant, effect on the treatment at the plant, effect on reclaimed water and violation of the NPDES permit.

OPENING STATEMENT OF INTENT: A. Glenn Greer, Asst. Director, Public Utilities.

Mr. Greer stated, the reason we are at this meeting is to discuss the violations of the permit by Howco Environmental Services. He also stated the need to discuss problems and violations in a cooperative way, thus, finding a solution by the end of the meeting. If no solution is found, the City will have to take a different approach to the problems and violations caused by Howco. If full cooperation is extended from Howco, further penalties will be reduced. He added that a written response is needed from Howco responding to the allegations by September 9, 1988.

SUMMARY of PROBLEMS and INTERIM COMPLIANCE REQUIREMENTS:  
Dr. John Parnell, Industrial Pretreatment Coordinator.

Dr. Parnell stated that Howco is in significant non-compliance due to several significant violations of their wastewater discharge permit. He referred back to the annual summary of Howco's industrial discharge self-monitoring report that was submitted to the USEPA. He pointed out the repeated violations of phenol, the high BOD, high COD, and oil and grease. Dr. Parnell added that he initiated the unscheduled monitoring due to 188 mg/L oil and grease (limit 100 mg/L) and 6.0 mg/L phenol (limit 5.0 mg/L) which was reported on the May 3 self-monitoring report by Howco. The unscheduled monitoring was initiated on July 20, 1988.

Dr. John Parnell indicated that a blue colored effluent was being discharged by Howco and Samples were taken by an automatic sampler. The samples were analyzed for metals indicated severe violations of copper throughout the day, lead and zinc violations on the 9:00 a.m. sample. On July 21 and 22, composite samples were analyzed for oil and grease and found to be within limits. A sample taken on July 26 at 12:25 p.m., indicated an excess of oil and grease (737 mg/L.). July 27 composite sample indicated copper level at 5.7 mg/L (limit 4.5).

Dr. Parnell described the method he and his staff used to backtrack the slug entering the Southwest plant. He explained the attempts to fingerprint the unknown slug by chemical analytical methods, but the results were inconclusive. Dr. Parnell added that odor was used to backtrack the slug to Howco. The isolation of Howco as the originator of a malodorous discharge resulted in further unscheduled sampling. Samples from August 10 showed excess copper levels of 20.6 mg/L and zinc levels of 54.6 mg/L (limit 4.2) for that working day. Sample from August 11 indicated copper levels of 20.5 mg/L and 7.5 mg/L zinc. Oil and grease samples from August 10 and 11 indicated a value of 564 mg/L and 460 mg/L respectively.

A flow meter was installed by Dr. Parnell and his staff to an 8 inch Palmer-Bowlus flume on August 22nd. Howco's discharge was monitored and recorded continuously. Several times the flow was recorded at 150+ gallons per minute (flow limit 20 gallons per minute) for a period of 1-2 hours. A discharge of this magnitude containing high concentrations of BOD, COD, metals, oil and grease could upset the biological treatment process at the receiving plant frequently.

Dr. Parnell also added that Howco was in violation due to unauthorized deviation from the approved discharge contained in the permit. He also indicated that the waste discharged included wastes that originated from processes other than oil recycling for which Howco is permitted and the City of St. Petersburg Public Utilities officials were not informed.

Other concerns cited by Dr. Parnell were:

- 1) Howco's discharge may have the potential to cause fire or explosion, especially the sewer dedicated to Howco, (Section 28-52 B1).

Industrial Pretreatment Conciliation Meeting with Howco  
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2) The concern for strength of ethylene glycol, pure ethylene glycol could have a BOD of 750,000 mg/L and could adversely affect the treatment at the plant.

3) Noxious and malodorous gas emanating is a concern to the Health of the Employees at the plant.

Dr. Parnell stated the action that is required to be taken by Howco, in order to stay within compliance with the City ordinance:

1) At no time will Howco discharge exceed 20 gallons per minute or 28,000 gallons per day, and all wastewater except domestic wastewater shall pass through the pretreatment system.

2) Howco's wastewater discharge shall not exceed a COD level of 10,000 mg/L at anytime and the COD concentration shall not vary more than one and five tenths (1.5) times more or less than the average levels at anytime. COD samples representative of discharge shall be taken twice per day and analyzed by a DHRS Certified Environmental Laboratory and analyses must be submitted to the City within 72 hours.

3) For a period of two months, weekly samples representative of typical discharge will be taken by Howco in the presence of a pretreatment representative and the sample will be analyzed for priority pollutants by an approved method by a DHRS approved laboratory.

4) Howco discharge must not contain more than the permitted levels of copper, cadmium, chromium, zinc, lead, nickel, arsenic, oil and grease and phenol.

5) Howco is required to take LEL readings with an explosion hazard meter in manhole #146.0 on 9th Avenue South for a period of one (1) month. Reading shall be taken twice a day and reported to the City by phone daily. A complete signed log of of these records must be retained at Howco and a copy submitted to the City.

6) With reference to City Ordinance 28-52 B(9), Howco is required to immediately address the noxious and malodorous gases that emanate from their discharge.

7) The City requires Howco to respond in writing on or before September 9, 1988 explaining how compliance with all local and federal regulations will be achieved.

8) Howco is required to submit a completed application for the renewal of their wastewater permit on or before November 1, 1988.

9) Howco is required to permanently install a suitable certified water meter in the discharge piping between the treated wastewater storage tank and point of discharge to the sanitary sewer. Howco is required to maintain and keep the meter certified. The meter must be read monthly and the reading submitted to the City for billing purposes.

RESPONSE: Howco Environmental Services, ( Tim Hagan, Allan Hajian) Norman Hatch (CH2M Hill).

Tim Hagan stated that CH2M Hill was hired by Howco Environmental Services to oversee the pretreatment system. Norman Hatch, Engineer for CH2M Hill stated that Howco did not have any willful intent to dump. He added that the pretreatment facilities are sound, but needs fine tuning. He indicated the wastewater after treatment will be stored in a 30,000 gallon tank (152) and will be tested before it is discharged. The on-site laboratory has applied for D.H.R.S. certification. He also added the need for better quality control to monitor the discharge.

Howco representatives also indicated that a flow restriction orifice has been installed. It is not adjustable and the flow will be 20 gallons per minute or less. They also indicated, a water meter will be installed. Allan Hajian stated that an Automatic ISCO Sampler (2910) will be permanently installed in the pretreatment system and will continuously take samples. The samples can be split with the City if need be, or the samples will be saved for a period of 30 days. He also added that some modification have been made to the process and if the effluent quality does not meet the discharge limit it will be retreated until the discharge limit is met.

Dr. John Parnell commented about the separation of hydrocarbons to the top of the tank. Girish Menon, (Industrial Pretreatment) indicated the colloidal materials present in the Howco discharge and the high iron and manganese. Allen Hajian stated that an air stripper is being put up. The permit has been received for construction of the air stripper and it will take care of any volatiles. Representatives of Howco indicated that they will get back with the City on the COD limit after they discuss it.

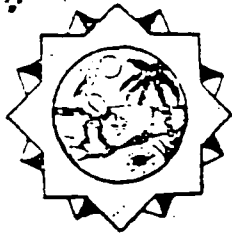
Norman Hatch indicated that operators will be trained and retrained frequently. Better quality assurance procedures will be implemented, chain of custody will be signed off before the tank is discharged. Mr. Hajian stated that each batch will be treated for oil and grease, all metals not removed will be reprocessed to ensure the removal. He added that cyanides are analyzed by generator and if it is above RCRA limit, then Howco would refuse the waste. He also added that the sludges is taken to a class A landfill.

Tim Hagan, President of Howco, stated that Howco is committed to do whatever is necessary to comply with the limits and will do what Norman Hatch recommends. He also added that they are looking to make improvements to the process and he did not know Howco was out of compliance. He stated that they did not intentionally dump on the City. He also invited the City representative to inspect his plant at any time.

Bill Johnson indicated the City needs the sketches of the plant to insure that there is no bypass around the system. Mr. Johnson also stated that he would like to see where the waste is brought in from, to get an idea of what is being treated and discharged. Allan Hajian added that there was no malicious intent in not sending the City copies of electroplating waste. He also said he thought D.E.R. would send it, because he wrote City on it.

END OF MEETING

GM:lh



CITY OF ST. PETERSBURG, FL.  
DEPARTMENT OF PUBLIC UTILITIES

Day and Date: 09/02/88 Time: 9:30  
Place: Public Utilities (Conference Room A)  
Meeting Re: Conciliatory meeting with Tims oil /  
HOWCO ENVIRONMENTAL

NAME	AGENCY REPRESENTED	Phone No.
Tim HAGAN	HOWCO	323-0818
Jim Dickson	Company Counsel HOWCO	895-1971
Allen Hajian	HOWCO	323-0818
Ralph Williamson	HOWCO	323-0818
Noam Hirsch	CH2M Hill, Tampa	893-6222
John Parnell	City of St Pete	893-7739
GIRISH MENON	CITY OF ST PETE	893-7739
Kevin Rostowicz	City of St. Pete	893-7719
GEORGE Ken WISE	CITY OF ST. PETE	893-7497
Wm D Johnson	.....	893-7261
Glenn GREER	CITY OF ST. PETE	893-7261
Fred Croft	City of St. Pete	893-7791
Janet Gifford	City - Legal	893-7401
David Shulmister	Public Utilities	893-7261
Elizabeth Luvato	FOER-DANCE	1-623-5561



September 9, 1988

Dr. John R. Parnell  
Industrial Pretreatment Coordinator  
Public Utilities Department  
1635 3rd Avenue North  
St. Petersburg, FL 33713

Dear Dr. Parnell:

Subject: HOWCO response to your letters dated August 24 and September 2, 1988

Thank you for the information you have shared with us and for your cooperation regarding HOWCO's pretreatment wastewater discharge. Be assured that HOWCO is very concerned about compliance with all of the provisions of our Pretreatment Wastewater Discharge Permit. We are committed to taking the necessary measures to assure compliance.

Following your letter of August 24, we retained CH2M Hill for technical advice regarding our wastewater pretreatment system. CH2M Hill has evaluated our system and found that, with proper operation, the system is capable of pre-treating our wastewaters to comply with our permit conditions. CH2M Hill also assisted HOWCO in planning the following program to assure permit compliance:

- \* All pretreated wastewater is now contained in effluent storage tanks and analyzed for permit compliance prior to discharge to the city sewer. Effluent that does not meet permit limits will be retreated until compliance is achieved. Compliance for each batch of stored effluent will be certified by our chemist or lab technician prior to discharge to the city sewer.
- \* A permanent restrictive orifice has been installed on HOWCO's final discharge to the city sewer. The orifice restricts the maximum flow at maximum pressure to 20 GPM.
- \* A certified water meter will be permanently installed in HOWCO's final discharge line to the city sewer. An automatic sampler (ISCO) will also be installed to collect samples of the treated effluent. These samples will be split and analyzed by HOWCO's onsite laboratory to provide additional assurance of permit compliance. Split samples will be stored onsite for 30 days and will be made available to the city upon request. HOWCO has also requested DHRS to expedite the certification process which is currently underway for our onsite laboratory.

- \* Operator refresher training will be conducted each month to assure that proper treatment system and quality control procedures are being followed.
- \* You have directed that HOWCO provide LEL readings with an explosion hazard meter in city manhole #146.0. Based on prior results of priority pollutant analysis, the levels of contamination by volatiles is very minimal. Therefore, we respectfully request to be released from that directive.
- \* HOWCO will collect final discharge samples twice each day for COD analysis. These samples will be sent to a DHRS certified laboratory for analysis. We respectfully request that this be required every two days for a period of thirty days. This should provide adequate data to determine a mean level. We respectfully request that HOWCO's C.O.D. permit limits be set at 20,000 mg/l. Past testing has indicated this level to be representative of HOWCO's pretreated wastewater.
- \* HOWCO will collect typical final discharge samples weekly for analysis of EPA Priority Pollutants. Samples will be collected in the presence of a pretreatment representative of the city. We respectfully request that the frequency of sampling be limited to once every two weeks over a three month period.

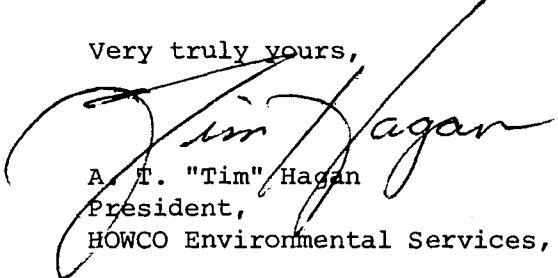
In addition to the above, HOWCO will instruct all plant operating staff to be on the alert for incoming waste and pretreated waste exhibiting noxious odors. We request that the city notify us when the odor is detected at the Southwest Treatment Plant in the future. We would like to send a HOWCO chemist to the plant to become familiar with the odor. We are certainly as puzzled as you are as to the source of your odor problems. As a point of information, we have examined your historical data on odor occurrences and compared this information with our operating records. It is interesting to note that on eleven odor occurrence dates, the HOWCO plant was neither operating nor discharging wastewater.

Many of HOWCO's employees and officers are residents of the City of St. Petersburg. We as good citizens share in your responsible concern for the city's wastewater treatment program. Many of us are recipients of the reclaimed water at our homes. We have mutual concerns to make this program as efficient and cost-effective as possible, because we also contribute to the revenues which support it. It is, therefore, to our best interest as good citizens to see to it that your job is not more difficult. To that end we gladly offer our assurance that all materials discharged from this facility under our control will be in compliance with permit limits.

Dr. John Parnell  
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September 9, 1988

We anticipate a long mutually beneficial relationship with your department.  
Please feel free to visit us at any time.

Very truly yours,



A. T. "Tim" Hagan  
President,  
HOWCO Environmental Services, Ltd.

cc: Mr. William D. Johnson,  
Director, Department of Public Utilities  
Mr. Glenn Greer,  
Assistant Director, Department of Public Utilities  
Mr. Ralph E. Williamson,  
General Manager, HOWCO  
Mr. Allen Hajian,  
Environmental Manager, HOWCO  
Mr. V. James Dickson,  
HOWCO Corporate Counsel  
Mr. Norman N. Hatch, Jr.,  
CH2M Hill