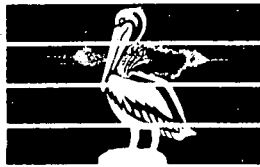


CERTIFIED MAIL
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CITY OF ST. PETERSBURG JAN 19 1989

January 13, 1989

HAZARDOUS WASTE

Mr. Tim Hagan
President
HOWCO
843 43rd Street South
St. Petersburg, Florida 33711

RE: Violation of City of St. Petersburg Code Section 28-52 (b) (1, 4 & 6) arising from results of GC/MS fingerprint analysis of Howco's discharge and slug influent at the Southwest Wastewater Treatment Plant.

FLD 152764767

Dear Mr. Hagan:

As you are aware, the City of St. Petersburg has been experiencing slug influent loadings at it's Southwest Wastewater Treatment Plant since January 1987. These toxic influents cause an interference at the plant by decreasing the dissolved oxygen levels in the aerators and deleteriously affecting the biological treatment process.

At the conciliation meeting between City Officials and Howco Environmental Services Inc., on September 2, 1988 we brought it to your attention that we were attempting to fingerprint the slug influent by chemical analytical methods.

On October 31, 1988 and November 1, 1988, grab samples of Howco's effluent were taken at 12:50 pm and 1:40 pm respectively from the collection point at City manhole 303.0 on 44th Street between 9th and 10th Avenues South.

The Southwest Wastewater Treatment Plant experienced a slug influent which began at 3:40 pm on October 31, 1988. At 6:00 pm on November 1, 1988, the Southwest Wastewater Treatment Plant began experiencing a slug influent flow which seriously upset it's treatment process. Samples of the slug influent were collected from the wetwell at the plant while the upset was in progress.

The sample of treatment plant slug influent and both of Howco's grab samples were sent to a certified laboratory for capillary gas chromatograph/ mass spectrometer fingerprint analysis.

Results received from the laboratory confirm that the slug influent and both of Howco's samples contained identical compounds from a complex hydrocarbon residue identified as a petroleum distillate, consistent with compounds found in gasoline. These compounds are known to be incompatible with the wastewater treatment process.

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A similar analysis on a sample of slug influent taken during an upset at the Southwest Wastewater Treatment Plant on November 14, 1988 was also performed. Once again, the analysis confirmed that petroleum distillates consistent with compounds found in gasoline were detected in the slug influent. The compounds are similar to those previously associated with the slug.

As a control, the Southwest Wastewater Treatment Plant influent was sampled at 11:15 am on November 21, 1988, when the plant was functioning normally and no upset was being experienced. The results of these analyses confirmed that normal influent contains no appreciable quantities of volatile organic compounds of any type.

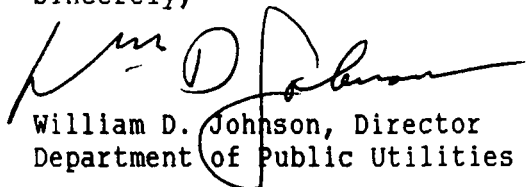
These fingerprinting analyses thus show that the chemical compounds occurring in your effluent are identical to those that occur in the slug influent which upsets the treatment plant. These compounds are not present in normal treatment plant influent.

Section 28-52 (b) (1,4 & 6) of the St. Petersburg City Code specifically refers to the prohibition of all explosive, oxygen demanding or toxic pollutants from entering the sanitary sewer system if they cause interference at the receiving POTW. Section 28-55 (i) also empowers the Director of Public Utilities to temporarily terminate sewer service, at his discretion, to users who may be causing plant interferences.

You are forthwith required to reduce the level of all petroleum related compounds to below detectable limits in your effluent, so as to comply with the City Ordinance.

You are also required to respond to this letter within ten (10) days.

Sincerely,



William D. Johnson, Director
Department of Public Utilities

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
Glenn Greer, Assistant Director, Department of Public Utilities
Alfredo J. Crafa, Manager, Water Quality Assessment Division
John R. Parnell, Ph.D. Industrial Pretreatment Coordinator
Janet L. Gifford, Attorney, Legal Section, City of St. Petersburg