



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION IV

345 COURTLAND STREET, N.E.
ATLANTA, GEORGIA 30365

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HAZARDOUS WASTE
PERMITTING

Mr. A.T. Hagan, President
HOWCO Environmental Services, Inc.
843 - 43rd Street, South
St. Petersburg, FL 33711

RE: Notice of Violation
HOWCO Environmental Services, Inc., St. Petersburg, Florida
EPA I.D. Number: FLD 152 764 767

Dear Mr. Hagan:

On April 12, 1990, the Florida Department of Environmental Regulation (FDER) conducted an inspection of your facility to determine compliance with the applicable regulations of the Land Disposal Restrictions Rule (LDRR).

Pursuant to Section 3006(g) [42 U.S.C. 6926(g)] of the Hazardous and Solid Waste Amendments of 1984, any new requirements and prohibitions imposed under the Resource Conservation and Recovery Act (RCRA) immediately take effect in authorized states. Therefore, EPA will enforce these requirements and prohibitions in authorized states until the state is granted authorization for these requirements. The EPA will, therefore, enforce the Land Disposal Restrictions Rule published in the Federal Register on November 7, 1986, and July 8, 1987, August 17, 1988, and June 23, 1989. Effective on November 8, 1986, hazardous wastes with EPA Codes F001 through F005 are restricted from land disposal. Effective July 8, 1987, certain of the California List wastes are restricted from land disposal. The prohibitions regarding the "First Third" wastes became effective on August 8, 1988, and the "Second Third" on June 23, 1989.

This Notice of Violation only addresses violations associated with the Land Disposal Restrictions Rule. Noted during the inspection at your facility was the following violation:

<u>Rule</u>	<u>Violation/Comment</u>
40 CFR 268.7(a)(6)	Facility failed to keep copies of all land disposal restriction notices sent to designated treatment, storage, or disposal facilities.

HOWCO Environmental Services, Inc., must comply with all the requirements of 40 CFR 268. If the above requirements are not met pursuant to Section 3008 of RCRA [42 U.S.C. 6928], a penalty of up to \$25,000 per day may be assessed.

To assure the Agency of compliance with the above, please provide a written plan of action to illustrate the steps to be taken in the future to comply with these requirements. Included in this plan should be an example of the written notifications that will be provided to the receiving facility. This plan shall be provided to EPA within thirty (30) days of receipt of this letter and addressed to:

Mr. James H. Scarbrough, P.E., Chief
RCRA and Federal Facilities Branch
Waste Management Division
U.S. Environmental Protection Agency
345 Courtland Street, N.E.
Atlanta, Georgia 30365

If you have any questions, please do not hesitate to contact Daryl Himes of my staff at (404) 347-7603.

Sincerely yours,



Don Guinyard, Acting Director
Waste Management Division

cc: Mr. Barry Swihart, Chief
Bureau of Waste Planning and Regulation
Florida Department of Environmental
Regulation (w/o enclosure)

Dr. Richard D. Garrity
Deputy Assistant Secretary
Southwest Florida District
Florida Department of Environmental
Regulation (w/o enclosure)