



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

FACILITY INFORMATION:

Facility Name: HOWCO Environmental Services

On-Site Inspection Start Date: 09/10/2014

On-Site Inspection End Date: 09/10/2014

ME ID#: 1038

EPA ID#: FLD152764767

Facility Street Address: 843 43rd St S, St Petersburg, Florida 33711-1922

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

County Name: Pinellas

Contact Phone: (727) 327-8467

NOTIFIED AS:

CESQG (<100 kg/month)

Used Oil

INSPECTION TYPE:

Routine Inspection for CESQG (<100 kg/month) facility

Routine Inspection for Used Oil Processor facility

INSPECTION PARTICIPANTS:

Principal Inspector: Rebecca L. Nipper, Environmental Specialist II

Other Participants: Richard Dillen, Quality Assurance Officer; Leslie Pedigo, Environmental Specialist III; Lee Morris, Director of Operations

LATITUDE / LONGITUDE: Lat 27° 45' 40.8037" / Long 82° 41' 32.5519"

SIC CODE: 2911 - Manufacturing - petroleum refining

TYPE OF OWNERSHIP: Private

Introduction:

HOWCO Environmental Services (HOWCO) was inspected by the Department of Environmental Protection on September 10, 2014, to determine the facility's compliance with state and federal hazardous waste and used oil regulations. The inspectors were accompanied throughout the facility by Mr. Richard Dillen, who manages the Laboratory, and additional assistance was provided by Mr. Lee Morris, who manages the Yard. HOWCO was last inspected by the Department on September 5, 2012. HOWCO has a used oil and solid waste processing permit issued by the Department on June 2, 2011. The permit will expire on August 3, 2015.

Process Description:

HOWCO stores, processes and markets used oil and is a registered used oil filter transporter and processor, as well. Additionally, HOWCO accepts used oil, oily water and petroleum contact water from third party transporters. As a result of the lab waste generated during QA testing, HOWCO is also a conditionally exempt small quantity generator of hazardous waste (CESQG). The facility is on City of St. Petersburg water and sewer systems. The only change to the processes since the previous inspection is that the facility no longer processes solid waste. Additional information regarding the process description can be found in past reports.

The overall appearance of the yard was relatively tidy. HOWCO has 23 registered aboveground storage tanks storing petroleum contact water (PCW), used oil, finished oil product, waste water, etc. The fire and emergency equipment are inspected monthly and tested annually. At the time of the inspection it was noted that the fire extinguisher in the laboratory had a service tag dated April 2012. Hazmat supplies are stored in one of three trailers on the south side of the property and include personal protective equipment and spill control equipment. Finished product is sold to asphalt companies such as Apec, Gulf Paving and Mosaic. Oily waste water and PCW accepted for

Inspection Date: 09/10/2014

recovery is separated through gravity separation. Oil is sent through the recovery process and fuel from PCW added to the fuel blending process. Water recovered from these processes is treated in the water treatment system prior to being discharged to the POTW.

HOWCO screens incoming oil for halogens first in the field by the drivers. Upon arrival at the facility a sample is taken and analyzed for Chlorine content in the lab prior to off loading.

HOWCO no longer operates a solid waste management for waste generated by its customers. There is now only one dumpster for solid waste generated at the facility, and roll-off containers are no longer in use. Waste water treatment sludge and oil- extracted sludge were last sampled on September 15, 2014. HOWCO has stopped doing sludge solidification on site and now outsources this waste stream to Clark Environmental.

The Maintenance Shop Generates used oil filters, used oil, used antifreeze and oily waste. The drums are labeled and protected from the weather. Spent solvent from the parts washer is disposed of with the shop's used oil. Used oil and antifreeze containers are kept within secondary containment. Batteries are returned to the vendor for core credit. Crushed metal used oil filters are sent to Kellen Environmental in Mulberry, FL and fiber used oil filters are sent to Pinellas County's incinerator.

Behind the laboratory, there are two 55-gallon drums of used oil in secondary containment. The drums are labeled and protected from the weather. The drums collect sample waste from the laboratory. Processed oil is randomly sampled bi weekly and tested to confirm it is on-spec. There has not been any cases of off-spec oil since the last inspection. Analyses are done off site by PhosLab. Samples of processed oil are retained in the Laboratory for 30 days. Hazardous COD testing waste generated in the laboratory, and spent vials are accumulated in a box labeled "Spent Vials." COD testing is done for compliance with the facility's waste water pretreatment permit. HOWCO is also maintains all testing required by their NPEDS Stormwater Permit FLRNEE845. Universal waste lamps are taken on CESQG days to the County collections center for disposal, along with laboratory waste.

Records were reviewed and found to be complete and up to date. The Contingency Plan was up to date and revisions had been distributed to the local authorities. The last major revision of the contingency plan was on October 12, 2012 and no changes have been made since. The plan is still current and accurate. HOWCO maintains written records of employee training which was last conducted on January 9, 2015. Shipping documents were up to date and no discrepancies were noted. There have been no instances of refused shipments with in the past three years.

Conclusion:

HOWCO was found to be in compliance with their permit and rules and regulations applicable to generators of hazardous waste and processors of used oil at the time of the inspection.

Inspection Date: 09/10/2014

Signed:

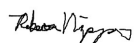
A hazardous waste compliance inspection was conducted on this date, to determine your facility's compliance with applicable portions of Chapters 403 & 376, F.S., and Chapters 62-710, 62-730, 62-737, & 62-740 Florida Administrative Code (F.A.C.). Portions of the United States Environmental Protection 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.

Rebecca L. Nipper

PRINCIPAL INSPECTOR NAME

Environmental Specialist II

PRINCIPAL INSPECTOR TITLE**PRINCIPAL INSPECTOR SIGNATURE**

FDEP

ORGANIZATION

2/3/2015

DATE**Supervisor:** Sean McGinnis

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.