



CITY OF ST. PETERSBURG

September 10, 1987

Mr. Timothy Hagan  
President  
Howco Environmental Services, Inc.  
4320 8th Avenue South  
St. Petersburg, Florida 33711

RE: SPFL-5093-86-32, Expansion of Permissible  
Discharge Volume.

Dear Tim:

This letter serves as a formal authorization for an increase in Howco's treated wastewater to the sanitary sewer. As has been previously verbally authorized, Howco may discharge up to twenty gallons per minute (28,000 gallons per day).

Also as was previously discussed, at this volume, Howco will need to start addressing additional treatment methods to reduce the levels of COD, BOD<sub>5</sub>, TOC, total halogens and priority pollutants along with phenol.

Howco's permit is due to be renewed in December, 1987. With this letter, I am extending Howco's permit until April, 1988. Hopefully, this will give Howco a chance to forecast its future growth, volume discharge and treatment scheme.

Should you have any questions, feel free to call.

Sincerely,

Nancy Neely  
Industrial Pretreatment Coordinator  
Water Quality Assessment Division

NN:lh

MAR 11 1988

COMMUNITY DISTRICT  
MPA

CERTIFIED MAIL

RETURN RECEIPT

REQUESTED



CITY OF ST. PETERSBURG

April 8, 1986

Mr. Tim Hagan  
President  
Howco Environmental Services, Inc.  
4320 - 8th Avenue South  
St. Petersburg, FL 33711

Re: Pretreatment Wastewater Discharge Permit No. SPFL-5093-86-32

Dear Mr. Hagan:

The City is pleased to enclose your discharge permit dated April 21, 1986, to discharge 10,000 gallons of wastewater per day into the City of St. Petersburg's sewer lines.

Sincerely,

A handwritten signature in cursive script, appearing to read "Glenn Greer", is written over the typed name.

Glenn Greer, P.E.  
Assistant Director  
Public Utilities

GG:dmd  
Enc.

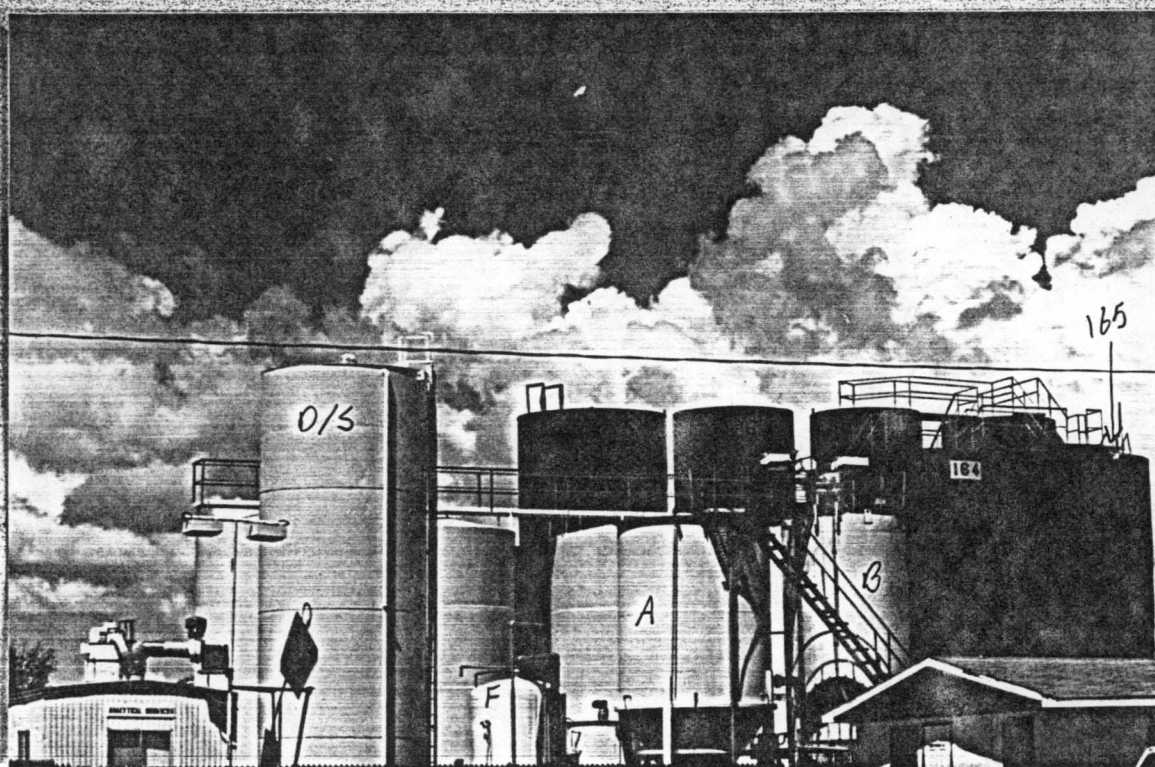
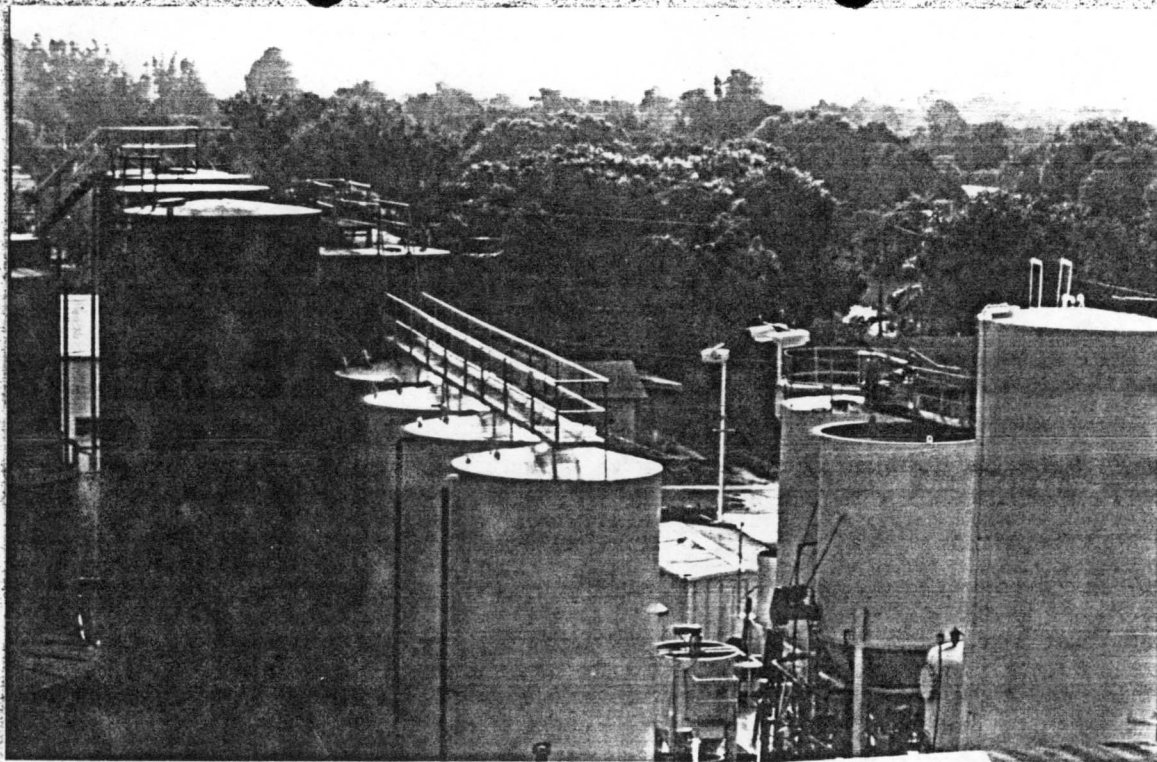
City of St. Petersburg  
Industrial User Self-Monitoring  
Summary Report Analytical Results  
Page II

Analysis

	Parameter	Unit	Result	Limit	Method
	Flow - Average	GPD			
	Flow - Peak	GPD			
X	Flow - Total (Daily)	GPD		28,000	
X	pH - Composite (average)	Std.		>5.5;<10.0	
	pH - Range	Std.			
X	BOD <sub>5</sub>	mg/l			
X	COD	mg/l			
X	TOC	mg/l			
	Total Toxic Organics	mg/l			
	Total Solids	mg/l			
	Total Volatile Solids	mg/l			
	Turbidity	FTU			
	Temperature - range	°F			
X	Oil & Grease (Petroleum &/or Mineral)	mg/l		100	
	Aluminum (Al) - Total	mg/l			
	Antimony (Sb) - Total	"			
X	Arsenic (As) - Total	"		2.1	
	Barium (Ba) - Total	"			
	Boron (B) - Total	"			

Analysis (Cont.)

	Parameter	Unit	Result	Limit	Method
X	Cadmium (Cd) - Total	mg/l		1.2	
X	Chromium (Cr) - Total	"		7.0	
	Chromium (Cr+++)-Hexavalent	"			
	Cobalt (Co) - Total	"			
X	Copper (Cu) - Total	"		4.5	
	Cyanide (Cn) - Total	"			
	Fluoride (F) - Total	"			
	Gold (Au) - Total	"			
	Iron (Fe) - Total	"			
X	Lead (Pb) - Total	"		0.7	
	Manganese (Mn) - Total	"			
	Mercury (Hg) - Total	"			
X	Nickel (Ni) - Total	"		4.1	
X	Phenols	"		5.0	
	Selenium (Se) - Total	"			
	Silver (Ag) - Total	"			
	Titanium (Ti) - Total	"			
	Tin (Sn) - Total	"			
	Zinc (Zn) - Total	"			
	Total Kjeldahl Nitrogen(TKN)	"			
	Ammonia Nitrogen (NH <sub>3</sub> -N)	"			
X	Total Halogens				
X	Volatiles & Base/Neutrals 4 x 1/yr				
X	Ethylene Dibromide (1x/yr.				
X	Priority Pollutant Scan (1x/2yr)				







RKV  
3/2  
②

STATE OF FLORIDA  
DEPARTMENT OF ENVIRONMENTAL REGULATION

TWIN TOWERS OFFICE BUILDING  
2600 BLAIR STONE ROAD  
TALLAHASSEE, FLORIDA 32399-2400



BOB MARTINEZ  
GOVERNOR

DALE TWACHTMANN  
SECRETARY

February 25, 1988

Mr. Allen Hajian  
Environmental Chemist  
HOWCO Environmental Services, Inc.  
843 43rd Street South  
St. Petersburg, Florida 33711

Dear Allen,

Thank you for your January 28 letter explaining HOWCO's proposed procedure for accepting and treating waste rinse water from the plating industry. Several issues must be clarified before final approval can be granted by the Department.

I will address the issues only as they pertain to the hazardous waste management and permitting regulations. I suggest that you also contact our Southwest Florida District Office as well as any other local regulatory agencies (city and/or county environmental agencies) to determine if there are any regulatory requirements from other program areas.

In your letter you state the "Product to be Treated: Rinse water from plating operations which have been neutralized, are not toxic, and do not contain any sludge or sediment". This should be clarified to state that: this waste water will not meet any of the characteristics of hazardous waste as defined in 40 Code of Federal Regulation (CFR) Part 261 Subpart C; will not be mixed with any wastes listed in 40 CFR Part 261 Subpart D; and will consist of treated effluent exclusive of "sludge" as defined in 40 CFR Part 260.10, to be exempt from hazardous waste generator and transporter requirements.

The individual generators of the waste are responsible for determining whether their wastes are hazardous prior to shipping. The generators are also responsible for proper shipment of the waste if it is determined to be hazardous. Should a wastestream be determined to be hazardous, the generator, transporter and HOWCO (as the receiving facility) will be in violation of state and federal rules. Therefore, it is extremely important that careful analyses and thorough documentation be maintained on each wastestream accepted for treatment.

Letter to Allen Hajian  
February 25, 1988  
Page Two

Treatment of the electroplating wastewater is exempt from hazardous waste permitting if the treatment process is approved as a Waste Water Treatment Unit (WWTU) as defined under 40 CFR Parts 264.1(g)(6) and 260.10. That is the WWTU must consist of a system of interconnected tanks who's discharge is subject to regulation under either Section 402 or 307(b) of the Clean Water Act. The DER Southwest district office must be contacted to determine if HOWCO's treatment system has been constructed to meet these requirements.

Finally, the sludge removed from the WWTU an F006 hazardous waste, must be disposed of within 90 days in accordance with the requirements of 40 CFR Part 262. HOWCO must therefore comply with the hazardous waste generator requirements for management of electroplating rinse bath wastewaters.

I hope I have made clear where the Department's stands on your proposed procedure. If you have any further questions, please call me at (904) 488-0300.

Sincerely,

*Charlie Biedermann*

Charles A. Biedermann  
Engineer IV  
Hazardous Waste Management Section

CAB/pas

cc: ✓ Armando Gonzalez - w/copy of HOWCO letter  
Satish Kastury - w/copy of HOWCO letter  
Richard Drew - w/copy of HOWCO letter





January 28, 1988

RECEIVED  
D.E.P.  
88FEB-1 AM 11:35  
BUREAU OF  
WASTE MANAGEMENT

Mr. Charlie Biedermann  
Department of Environmental Regulation  
2600 Bear Stone Road  
Twin Towers Building  
Tallahassee, FL 32399-2400

Dear Mr. Biedermann;

I am writing this letter as a result of our telephone conversation on January 20, 1988. I am submitting the following procedure for accepting and treating rinse water residue from the plating industry.

Treatment Facility: HOWCO Environmental Services, Inc.  
843 43rd Street South  
St. Petersburg, FL 33711

Product to be Treated: Rinse water from plating operations which have been neutralized, are not toxic, and do not contain any sludge or sediment.

Generator: Any Plating Operation

The waste that meets the above conditions is determined to be non-hazardous, and can be transported to the above facility for treatment.

HOWCO Environmental Services realizes that if this waste is mixed with any other waste, the sludge produced as a result of the treatment process will be hazardous under EPA Hazardous Waste F006. HOWCO also realizes that this sludge cannot be mixed with any other sludge, and must be disposed of as hazardous waste. HOWCO further intends to keep this waste water and the sludge resulting from its treatment separate from all other waste waters and sludges.

In order to accomplish this separation, HOWCO will dedicate tanker #606 (capacity 8000 gallons), storage tank #165 (capacity 20,000 gallons), treatment tank #001 (capacity 8000 gallons) and sludge storage tank #004 with a 2000 gallon capacity. The entire

system from the receiving port to the final dewatering of the sludge is "hard-piped" and this is considered to be a part of the treatment process. The entire capacity of the system can be easily increased, and HOWCO stands ready to do that when the demand increases to that point. Of course, you would be notified in advance of any expansion.

Respectfully,

A handwritten signature in cursive script that reads "Allen Hajian".

Allen Hajian,  
Environmental Chemist

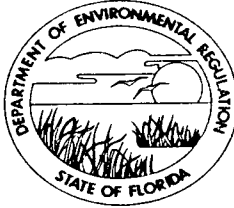
AH/ms

STATE OF FLORIDA  
DEPARTMENT OF ENVIRONMENTAL REGULATION

SOUTHWEST DISTRICT

4520 OAK FAIR BLVD.  
TAMPA, FLORIDA 33610-7347

813-623-5561  
Suncom—552-7612



BOB MARTINEZ  
GOVERNOR

DALE TWACHTMANN  
SECRETARY

DR. RICHARD D. GARRITY  
DISTRICT MANAGER

February 24, 1988

HOWCO Environmental Services, Inc.  
843 43rd Street South  
St. Petersburg, Florida 33711

Attn: Mr. Alan Hajian

Dear Mr. Hajian:

I have reviewed the analysis of your filter cake submitted to this office in your letter of February 12, 1988. From the data, the material in question does not appear to be hazardous waste and may be managed in a Class I landfill in accordance with Chapter 17-7, Florida Administrative Code.

Of course, a landfill may choose to accept or reject this material upon their own criteria.

Sincerely,

Elizabeth Knauss  
Environmental Supervisor  
Hazardous Waste Program

EK/br

# TIM'S OIL RECOVERY, INC.

4320 8th AVENUE SOUTH  
ST. PETERSBURG, FLORIDA 33711

February 12, 1988

D. E. R.

Elizabeth Knauss  
Department of Environmental Regulations  
4520 Oak Fair Boulevard  
Tampa, Florida 33610-7347

FEB 16 1988

SOUTH WEST DISTRICT  
TAMPA

Dear Ms. Knauss:

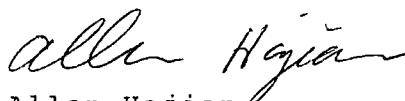
I regret to have to make this request, however, both our clients and the landfill require a letter of approval from you.

Enclosed, please find a copy of our analysis of filter cakes produced as a result of our water treatment plant. These filter cakes are non-hazardous by characteristics. The higher than usual PH is a result of use of lime in our process.

There are approximately 2-3 truck loads of this material in a pile. The samples were taken at 3, 6, and 9 feet into the pile.

Please call me if you have any questions. Your time and effort is greatly appreciated. Please respond as soon as possible.

Respectfully,



Allen Hajian  
Environmental Chemist

AH;dd  
Enclosure(s)



Laboratory Number    #381  
Sample Type            Filter Cakes  
Date Received          February 5, 1988  
For                      Tim's Oil Recovery  
  
Generator               Tim's Oil Recovery  
Attention

CERTIFICATE OF ANALYSIS

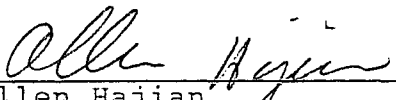
<u>LABORATORY NUMBER</u>	<u>MARKS</u>	<u>PARAMETER</u>	<u>CONCENTRATION</u>	<u>UNIT</u>
#381		Arsenic	< 0.5	mg/l
		Barium	< 10	
		Cadmium	< 0.1	
		Chromium	< 1.0	
		Lead	< 0.5	
		Mercury	< 0.2	
		Selenium	< 0.1	
		Silver	< 0.5	

Remarks: Metals by EP tox.

Continued on page 2.

All analyses are made in accordance with E.P.A., A.S.T.M.,  
Standard Methods or other approved methods.

Respectfully submitted

  
Allen Hajian  
Environmental Chemist


CERTIFICATE OF ANALYSIS

<u>LABORATORY NUMBER</u>	<u>MARKS</u>	<u>PARAMETER</u>	<u>CONCENTRATION</u>	<u>UNIT</u>
#381		Reactivity	Not Reactive	
		Corrosivity	Not Corrosive	
		PH	9.8	S.U.
		Egnitability	Not Egnitable	
		Flash	>200	°F

Remarks: \_\_\_\_\_

All analyses are made in accordance with E.P.A., A.S.T.M.,  
Standard Methods or other approved methods.

Respectfully submitted

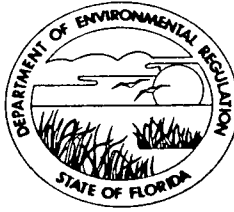
  
Allen Hajian  
Environmental Chemist



STATE OF FLORIDA  
**DEPARTMENT OF ENVIRONMENTAL REGULATION**

**SOUTHWEST DISTRICT**

4520 OAK FAIR BLVD.  
TAMPA, FLORIDA 33610-7347  
813-623-5561  
Suncom—552-7612



BOB MARTINEZ  
GOVERNOR  
DALE TWACHTMANN  
SECRETARY  
DR. RICHARD D. GARRITY  
DISTRICT MANAGER

January 11, 1988

Howco Environmental Services, Inc.  
843 43rd Street South  
St. Petersburg, Florida 33711

Attn: Mr. Allen Hajian

Dear Mr. Hajian:

Re: Sample #344

I have reviewed your analysis of the referenced sample. From the results it appears that the material is not a hazardous waste. This Department has no objection to the disposal of this material in a Class I landfill.

I have enclosed a copy of a guidance memo regarding disposal of petroleum contaminated soils for your use in the future.

If you have any questions, please call me at 623-5561.

Sincerely,

Elizabeth Knauss  
Environmental Supervisor  
Hazardous Waste Section

EK/br



January 7, 1988

Ms. Elizabeth Knauss  
Environmental Supervisor, H.W.S  
Fla. Dept. of Env. Regulation  
4520 Oak Fair Blvd.  
Tampa, FL 33610-7347

Dear Elizabeth;

Per our conversation today, I'm sending you the analytical results on sample #344. This waste, I believe, is as a result of a minor diesel fuel spill. Since this is a non-hazardous waste, we would like your approval to dispose of this waste in the Pinellas County Landfill.

If you have any questions, please do not hesitate to call me. Your time and effort is greatly appreciated.

Respectfully,

A handwritten signature in cursive script, appearing to read "Allen Hajian", is written over the typed name.

Allen Hajian,  
Environmental Chemist

AH/ms

Enclosure: Analytical report

D. E. R.

JAN - 8 1988

**SOUTH WEST DISTRICT  
TAMPA**

December 10, 1987

Laboratory Number 344  
Sample Type Petroleum contaminated soil  
Date Received December 5, 1987  
For Intersol Industries Corp.  
P. O. Box 270383  
Tampa, FL 33688  
Generator Bay Bulk Transport  
Attention

CERTIFICATE OF ANALYSIS

<u>LABORATORY NUMBER</u>	<u>MARKS</u>	<u>PARAMETER</u>	<u>CONCENTRATION</u>	<u>UNIT</u>
344		Arsenic	<0.5	mg/l
		Barium	<10.0	
		Cadmium	<0.1	
		Chromium	<1.0	
		Lead	<0.5	
		Mercury	<0.2	
		Selenium	<0.1	
		Silver	<0.5	

Remarks: Metals by E. P. ToxicityContinued on Page 2

All analyses are made in accordance with E.P.A., A.S.T.M.,  
Standard Methods or other approved methods.

Respectfully submitted

  
Allen Hajian  
Environmental Chemist

CERTIFICATE OF ANALYSIS


<u>LABORATORY NUMBER</u>	<u>MARKS</u>	<u>PARAMETER</u>	<u>CONCENTRATION</u>	<u>UNIT</u>
344		Corrosivity	non corrosive	
		pH	7.2	
		Ignitability	not ignitable	
		Flashpoint	>200	° F
		Reactivity	non reactive	

Remarks: \_\_\_\_\_

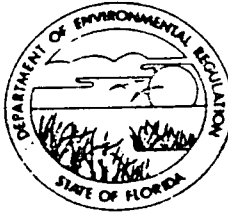
\_\_\_\_\_

All analyses are made in accordance with E.P.A., A.S.T.M.,  
Standard Methods or other approved methods.

Respectfully submitted

  
Allen Hajian  
Environmental Chemist

STATE OF FLORIDA  
DEPARTMENT OF ENVIRONMENTAL REGULATION



SOUTHWEST DISTRICT

4520 OAK FAIR BLVD.  
TAMPA, FLORIDA 33610-9544

813-623-5561  
SunCom—552-7612

BOB MARTINEZ  
GOVERNOR

DALE TWACHTMANN  
SECRETARY

DR. RICHARD D. GARRITY  
DISTRICT MANAGER

CERTIFIED MAIL  
RETURN RECEIPT REQUESTED

January 6, 1988

Mr. A. T. Hagan  
Tim's Oil Recovery/Howco  
4320 8th Avenue South  
St. Petersburg, Florida 33711

WARNING NOTICE #52-88-01-003  
FLD # 108 304 379

RE: Class II Hazardous Waste Violations  
Tim's Oil Recovery/Howco, Pinellas County

Dear Mr. Hagan:

A hazardous waste compliance inspection was conducted at your facility on November 3, 1987. A copy of the inspection report is attached to this Notice. This inspection was conducted under the authority of Section 403.091, Florida Statutes, and Chapter 403, Part IV, Florida Statutes, and is designed to ascertain the compliance status of your facility with 40 CFR 260 - 266, adopted in Florida Administrative Code Chapter 17-30.

During the inspection the following violations were noted:

- |                         |   |
|-------------------------|---|
| 40 CFR 266.43(b)(4)(ii) | Marketer's invoices did not include the required EPA identification numbers.                            |
| 40 CFR 266.43(b)(5)     | Marketer has not obtained the required notices from burners purchasing off-specification used oil fuel. |

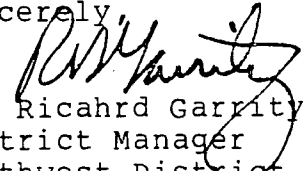
The violations set forth in this Warning Notice are Class II violations and may be resolved by the correction of the violations or, in some cases by the provision by you of an acceptable time schedule within which the violations will be corrected.

Mr. A. T. Hagan  
Warning Notice #52-88-01-003

Page Two

Please be advised that we must be notified in writing within ten (10) calendar days of the receipt date of this Notice of your desire to resolve these issues and your plans for complying with the cited statutes and rules. Please address your response to Ms. Juliet Gross of the District Office. Failure to respond in writing by the tenth day may result in the initiation of formal administrative enforcement through the issuance of a Notice of Violation and the assessment of penalties.

Sincerely,

  
Dr. Ricahrd Garrity, Ph.D.  
District Manager  
Southwest District

JG/msb

Attachment

cc: David Thulman, OGC  
Armando Gonzalez, HW  
Trussell Report



Sludges are dewatered by a filter press or in drying beds. All sludges generated at the facility are tested for hazardous characteristics before disposal. Sludges with a high-enough BTU value are sent to the Pinellas County Resource Recovery plant for incineration. Other sludges are sent to the County's Class I landfill. According to Howco's analyses, none of the sludges generated at the plant have been hazardous wastes.

Oil spills are scraped up by a bucket loader and taken to the lined drying beds. New shell sand is then placed in the hole.

9) SUMMARY OF VIOLATIONS

40 CFR 266.43(b)(4)(ii) - Marketers' invoices did not include the required EPA identification numbers.

40 CFR 266.43(b)(5) - Marketer has not obtained the required notices from burners purchasing off-specification used oil fuel.

APPROVED BY

Elizabeth Knauss  
Elizabeth Knauss  
Environmental Supervisor

DATE

11/15/87

Tim's Oil Recovery/Howco  
FLD 108 304 379  
Transporter

## 8) PROCESS DESCRIPTION

Tim's Oil Recovery, Inc. has notified as a transporter of hazardous waste and is in compliance with the financial assurance requirements of FAC Rule 17-30.170(2). However, the company has never transported hazardous waste and has no plans to do so in the immediate future.

Tim's Oil Recovery currently collects, treats and blends waste oil for sale as fuel and to the phosphate industry as a flotation agent in the beneficiation process. The company has notified as a marketer of specification and off-specification used oil fuel. A sister company, Howco, Inc. located at the same facility, pretreats water contaminated with oil and grease for discharge to the City of St. Petersburg's wastewater treatment system.

The truck drivers picking up waste oil are equipped with an electronic halogen sniffer calibrated to a known sample of 950 ppm of various halogenated organic compounds. If the sniffer detects halogens, the generator may request a follow-up colorimetric field test using a Clor'd'tect halogen test kit. Tim's does not pick up waste oil with more than 1000 ppm halogenated organic compounds.

There are three unloading stations at the facility, each capable of pumping to an oil-water separator or directly to the oil or water tanks. Samples from the tankers are first analyzed by the on-site lab to determine the proper treatment method. Oil and emulsified oil are heated to drive off water and pumped through 200 micron shaker screens before being pumped to storage tanks. Every load of waste oil sold is analyzed to determine if it meets the specification.

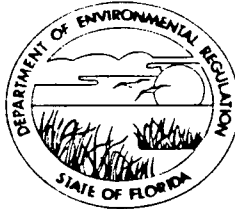
The invoices used by Tim's do not include the EPA identification numbers of the marketer and burner as required by 40 CFR 266.43(e)(4)(ii). In addition, the facility has marketed off-specification used oil fuel to a burner, Overstreet Paving Company who has not notified the Department of this activity per 40 CFR 266.44(b). In addition, Overstreet's operating permit #A051-120445 allows the source only to burn #6 fuel oil. A copy of this report will be referred to the Department's Air Section for investigation.

Wastewater from the oil "cook" tanks, the oil water separator and from off-site is analyzed before treatment. Howco has two tanks for batch treatment of wastewater, either by air flotation or sedimentation. The waste analysis determines the treatment method and the exact composition of the treatment chemicals. Treated discharged to the City of St. Petersburg's wastewater treatment system.

STATE OF FLORIDA  
DEPARTMENT OF ENVIRONMENTAL REGULATION

SOUTHWEST DISTRICT

4520 OAK FAIR BLVD.  
TAMPA, FLORIDA 33610-7347  
813-623-5561  
Suncom-552-7612



BOB MARTINEZ  
GOVERNOR  
DALE TWACHTMANN  
SECRETARY  
DR. RICHARD D. GARRITY  
DISTRICT MANAGER

HAZARDOUS WASTE INSPECTION REPORT

1. INSPECTION REPORT COMPLAINT ☒ ROUTINE    FOLLOW-UP    PERMITTING     
FACILITY NAME Tim's Oil Recovery/Howco DER/EPA ID FLD 108 304 379  
ADDRESS 4320 8th Avenue South - St. Petersburg, Florida 33711  
COUNTY Pinellas Phone (813) 327-8467 DATE 11/3/87 TIME 1:00 p.m.

TYPE OF FACILITY:

Generator	Storage	Treatment
<u>Small Quantity</u>	<u>Container</u>	<u>Tank</u>
<u>Generator</u>	<u>Tank</u>	<u>Land Treatment</u>
	<u>Waste Pile</u>	<u>Thermal</u>
Transporter	<u>Surface Impoundment</u>	<u>Chem/Phys/Bio.</u>
<u>X Transporter</u>		<u>Incinerator</u>
	Disposal	<u>Surface Impoundment</u>
	<u>Landfill</u>	
	<u>Surface Impoundment</u>	
	<u>Waste Pile</u>	

2. Applicable Regulations:

   40 CFR 262 ☒ 40 CFR 263    40 CFR 264    40 CFR 265 ☒ 40 CFR 266

3. Responsible Official: (Name & Title)

A.T. Hagen

4. Survey Participants & Principal Inspector

A.T. Hagen - Tim's      Elizabeth Knauss - FDER  
Wayne Stewart - Howco      Karen Boehm - FDER

5. Facility Latitude:

Longitude:

27° 54' 00"

82° 40' 21"

6. Type of Ownership: FEDERAL      STATE      COUNTY      MUNICIPAL      PRIVATE

7. Permit Number:                      Date Issued:                      Expiration Date:

Date 11/3/87  
Inspector F. J. Kinnear  
Facility ID# FD-104 304397

TRANSPORTERS CHECKLIST  
(40 CFR 263)

1. License number and current date on tag  
(tractor and trailer, if separate units) \_\_\_\_\_
2. Maintenance of records for the specified  
three year time limit? (263.72) \_\_\_\_\_ Yes \_\_\_\_\_ No
3. Copy of manifest or delivery document available?(263.20) \_\_\_\_\_ Yes \_\_\_\_\_ No
- Manifest containing at least: (263.21)
- a. Name and address of transporter? \_\_\_\_\_ Yes \_\_\_\_\_ No
- b. Name, address, identification code of generator? \_\_\_\_\_ Yes \_\_\_\_\_ No
- c. Name, address, identification code of designated  
permitted facility? \_\_\_\_\_ Yes \_\_\_\_\_ No
- d. Corresponding manifest document number? \_\_\_\_\_ Yes \_\_\_\_\_ No
- e. Description and quantity of each hazardous waste? \_\_\_\_\_ Yes \_\_\_\_\_ No
- f. Signature of subsequent transporters? \_\_\_\_\_ Yes \_\_\_\_\_ No
- g. Signatures signifying proper delivery or  
reasons why delivery could not be certified? \_\_\_\_\_ Yes \_\_\_\_\_ No
4. Containers properly labeled and marked? (262.31-.32) \_\_\_\_\_ Yes \_\_\_\_\_ No
5. International shipments: (262.50)
- a. Record of date waste left U.S.? \_\_\_\_\_ Yes \_\_\_\_\_ No
- b. Presence of one signed copy in records? \_\_\_\_\_ Yes \_\_\_\_\_ No
6. Evidence of leaking or damaged containers? (Note appearance of  
truck also) (263.30 - Hazardous Waste Discharges) \_\_\_\_\_ No \_\_\_\_\_ Yes
7. Vehicles containing hazardous waste placarded properly?  
(49 CFR 172.500) \_\_\_\_\_ Yes \_\_\_\_\_ No
8. If it is required of vehicle or if vehicle contains more than  
1,000 lbs of hazardous waste, check to see that markings:
- a. Appear on both sides of vehicle? \_\_\_\_\_ Yes \_\_\_\_\_ No
- b. Are in letters contrasting in color with background? \_\_\_\_\_ Yes \_\_\_\_\_ No
- c. Are legible during daylight from 50 feet away? \_\_\_\_\_ Yes \_\_\_\_\_ No
9. Does the operator have a copy of the financial assurance  
required by 17-30.17(2)? X Yes \_\_\_\_\_ No

RCRA Checklist for Inspection of Waste Fuel Marketers/Processors:Name of Facility: Times Oil Recovery, IncAddress: 4320 8th Avenue South  
St Petersburg, FLEPA Waste Fuel I.D. Number: FLD108304379Facility Inspection Representative: A.T. HagenTitle: presidentTelephone: (813) 327-8467

## Site Characterization:

1. Does the facility accept hazardous waste? yes no2. Does the facility blend hazardous waste with oil to be marketed as fuel? yes no3. Does the facility accept hazardous waste fuel, i.e., used oil previously blended with hazardous waste? yes no

## 4. Check the following general operating practices:

## Storage

Drum✓ Above-ground tank(s)Underground tank(s)OtherTank sizes

## Treatment

✓ SettlingHeat additionIn-Line FilteringCertrifugation✓ Screen FiltrationDehydration✓ Emulsion Breaking✓ Blending

## Disposal

✓ Landfill *non-hazardous sludge*Land TreatmentSurface Impoundment✓ Other incineration

## Descriptions and

Observations: drivers use halogen test Kit Clor'd tact  
manufactured by Dexel Corporationalso-suffer  
manufactured by  
TIF Instruments1 Hamden Park Drive  
Hamden, CT 06517  
2-11-89

5. Does the facility have Interim Status or a permit (Section 3005)?

yes

no

Specify: \_\_\_\_\_

6. Does the facility generate hazardous waste?

yes

no

7. Does the facility accept hazardous waste? specify waste and generator type.

yes

no

(Request manifests for review)

Small Quantity Generators(        <100kg/m or        100 ≤ 1000 kg/m )Large Quantity Generators

Specify waste types: \_\_\_\_\_

8. Does the facility accept only used oil? -

yes

no

9. Specify other material recycled as fuel.

none as Fuel - water is treated

10. Has the facility notified the Agency of their waste fuel activity? (§266.34(b))

yes

no

If no, explain: \_\_\_\_\_

11. Does the facility have manifests for all shipments of hazardous waste and blended hazardous waste fuel (received or sent)? (§265.70)

yes

no

N/A

12. Does the facility have a copy of the required notice from burners or marketers to whom waste fuel is marketed? (§266.34(e) or §266.43(b)(5))

yes

no

13. Does the facility have invoice information for shipments of used oil claimed to be specification used oil fuel? (§266.43(b)(6))

yes

no



14. Does the above invoice information for specification used oil fuel have a cross-reference to analysis or other information?

☒ yes ☐ no

15. Does the facility analyze for metals and halogens?

☒ yes ☐ no

Specify methods: \_\_\_\_\_

16. Does the facility have records of analysis or other information used to claim used oil meets the specification?

☒ yes ☐ no

17. Does the facility have the records required under §266.34(f) or §266.43(b)(6)?

yes ☒ no

Comments: certifications from burners  
not present

Note: If a facility markets hazardous waste fuel, the facility is subject to storage requirements of Parts 262, 264 or 265 and 270, Subparts A through L. Therefore, the RCRA checklist for inspection of TSD Facilities may be useful.

Inspector's Name: Elizabeth Knapp

Title: E. Sup I

Agency: EOER

Office Location: Tampa

Date of Inspection: 11-3-87

RCRA Checklist for Burners of Used Oil Fuel  
and Hazardous Waste Fuel

Name of Facility: \_\_\_\_\_

Address: \_\_\_\_\_  
\_\_\_\_\_

EPA Waste Fuel I.D. Number: \_\_\_\_\_

Facility Inspection Representative: \_\_\_\_\_

Title: \_\_\_\_\_

Telephone: \_\_\_\_\_

The following questions pertain to facilities regulated under Part 266 who are burning waste fuel for energy recovery. These do not necessarily apply to incineration under Subpart O of part 265.

- |  |     |    |
|--|-----|----|
| 1. Does the facility burn used oil fuel?<br>Specify: ____ off-specification ____ specification   | yes | no |
| 2. Does the facility burn hazardous waste fuel?  | yes | no |
| 3. Does the facility's burning unit(s) classify as<br>industrial boiler(s) or industrial furnace(s)?   | yes | no |
| 4. Has the owner/operator notified EPA of their<br>waste fuel activity? (§266.35(b) or §266.44(b))   | yes | no |
| 5. Was the facility existing before May 29, 1986?  | yes | no |
| 6. Does the facility have records of the <u>required</u><br><u>notices</u> sent to the fuel suppliers (marketers)<br>for hazardous waste fuel or off-specification<br>used oil? (§266.35(d) or §266.44(c)) | yes | no |
| 7. Does the facility have Interim Status or a<br>permit (§3005)?   | yes | no |

Note: Storage requirements under Subparts A through L, Parts 262, 264 or 265 and 270 apply to these facilities as of May 29, 1986. Therefore, refer to the RCRA Checklist for Inspection of TSD Facilities.

14. Does the above invoice information for specification used oil fuel have a cross-reference to analysis or other information?

☒ yes ☐ no

15. Does the facility analyze for metals and halogens?

☒ yes ☐ no

Specify methods: \_\_\_\_\_

16. Does the facility have records of analysis or other information used to claim used oil meets the specification?

☒ yes ☐ no

17. Does the facility have the records required under §266.34(f) or §266.43(b)(6)?

yes ☒ no

Comments: certifications from burners  
not present

Note: If a facility markets hazardous waste fuel, the facility is subject to storage requirements of Parts 262, 264 or 265 and 270, Subparts A through L. Therefore, the RCRA checklist for inspection of TSD Facilities may be useful.

Inspector's Name: Elizabeth Krauss

Title: E. Sup I

Agency: EOER

Office Location: Tampa

Date of Inspection: 11-3-87

HAZARDOUS WASTE INSPECTION  
EXIT INTERVIEW

FACILITY:

Tim's Oil Recovery / HOCOCO

I.D. NUMBER:

FL0108 304 379

DATE: 11/13/87

TIME: 1:00

INTERVIEW PARTICIPANTS:

A.T. Hagen, Bob Knauss, Karen Bueh

This exit interview is the Department's procedure to advise you early in the process of possible violations of Florida Administrative Code Chapter 17-30, which adopts Federal Regulation 40 CFR Parts 260-266 by reference. It is possible that the violations noted and checked are incomplete. After a complete internal file review by the Department, an inspection report will be finalized. In most cases the violations noted below by the inspector will not change in the final report, therefore, you are advised to immediately begin correcting these violations. The Department will forward the complete inspection checklist along with the finalized inspection report within 45 days. Be advised that the Department has signed an enforcement agreement with the U.S. Environmental Protection Agency which calls for the assessment and collection of monetary penalties for violations. While your quick response in correcting the violations may not reduce the calculated penalties, continued non-compliance may result in greater penalty liability.

The following violations have been tentatively identified:

- ☐ 1. Hazardous Waste Determination (262.11).
- ☐ 2. Hazardous Waste Notification (262.12 or 263.11 or 264/265.11).
- ☐ 3. Manifest Deficiencies or Recordkeeping and Reporting (262 Subpart B and D or 263 Subpart B or 264/265 Subpart E).
- ☐ 4. Personnel Training [263.16 (262.34(d) for SOG) or 264.16].
- ☐ 5. Contingency Plan [263 Subpart D (262.34(e) for SOG) or 264 Subpart D].
- ☐ 6. Preparedness and Prevention (263 Subpart C or 264 Subpart C).
- ☐ 7. Container Requirements (262.34 or 264/265 Subpart I).
- ☐ 8. Tank Requirements (262.34 or 264/265 Subpart J).
- ☐ 9. Operating a treatment, storage or disposal facility without a permit (402.722 F.S., F.A.C. 17-30, Section IV).
- ☐ 10. Security Requirements (264/265.14).
- ☐ 11. Groundwater Monitoring (264/265 Subpart F).
- ☐ 12. Closure/Post-closure (264/265 Subpart G).
- ☐ 13. Failure to comply with the provisions of a Department Issued Permit or with the provisions of the Consent Order.
- ☒ 14. Other 40CFR 266 - required rectification from burners  
in voice requirement

COMMENTS:

DEP INSPECTOR SIGNATURE:

[Signature]

FACILITY PARTICIPANT SIGNATURE:

[Signature]

NOTE:

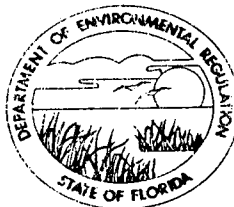
BY SIGNING THIS FORM THE FACILITY PARTICIPANT IS ONLY INDICATING THAT THIS FORM HAS BEEN RECEIVED. THIS IS NOT AN ADMISSION THAT THE CITED PROVISIONS HAVE BEEN VIOLATED.

STATE OF FLORIDA  
DEPARTMENT OF ENVIRONMENTAL REGULATION

SOUTHWEST DISTRICT

4520 OAK FAIR BLVD.  
TAMPA, FLORIDA 33610-7347

813-623-5561  
Suncom-522-7612



BOB MARTINEZ

GOVERNOR

DALE TWACHTMANN

SECRETARY

DR. RICHARD D. GARRITY

DISTRICT MANAGER

July 15, 1988

Rebecca Wood  
HOWCO Environmental Services  
843 - 43rd Street South  
St. Petersburg, Florida 33711

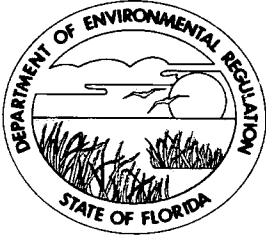
Dear Ms. Wood:

Enclosed is the information you requested. If you have any questions, please call me at (813) 623-5561.

Sincerely,

Elizabeth Knauss  
Environmental Supervisor  
Waste Management Program

EK/br



## Florida Department of Environmental Regulation

Twin Towers Office Bldg. • 2600 Blair Stone Road • Tallahassee, Florida 32399-2400

Bob Martinez, Governor

Dale Twachtmann, Secretary

John Shearer, Assistant Secretary

07-12-88

TIM HAGAN

HOWCO-ENVIRONMENTAL SER INC

843 43RD ST S

ST PETERSBURG

FL 33711

REC  
JUL 15 1988

RE: Facility ID # FLD152764767

Based on information supplied by you, we have processed and accepted at the state level your request for the facility identified with the above ID number to receive the following status change under RCRA:

Your facility status has been changed to the following:

Generator.

Transporter.

We are advising EPA of this change. Please notify us if there is any further change in your operations which would affect your status.

Sincerely,

Michael X. Redig  
Environmental Supervisor II  
Hazardous Waste Section

cc: Ann Cole - EPA/Region IV  
Armando Gonzalez - DER/Tampa  
GMS-ID # 4052P00632

D. E. R.

JUL 14 1988

SOUTH WEST DISTRICT  
TAMPA

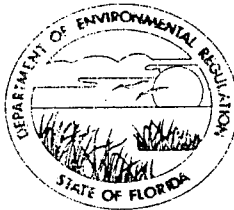


F

STATE OF FLORIDA  
DEPARTMENT OF ENVIRONMENTAL REGULATION

SOUTHWEST DISTRICT

4520 OAK FAIR BLVD.  
TAMPA, FLORIDA 33610-7347  
813-623-5561  
Suncom—552-7612



BOB MARTINEZ  
GOVERNOR  
DALE TWACHTMANN  
SECRETARY  
DR. RICHARD D. GARRITY  
DISTRICT MANAGER

July 7, 1988

Allen Hajian  
Environmental Chemist  
HOWCO Environmental Services, Inc.  
843 43rd Street South  
St. Petersburg, Florida 33711

Re: HOWCO Environmental Services, Inc., FLD 152 764 767  
Treatment of electroplating wastewater treated  
effluent

Dear Mr. Hajian:

We acknowledge receipt of your letters of March 25, 1988 and June 30, 1988 providing additional information requested in our letter of March 16, 1988.

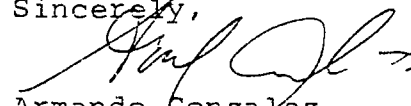
This letter ratifies the determination provided in our letter of March 16, 1988 that the proposed operation does not require a hazardous waste treatment permit as long as the conditions mentioned in items 1 through 3 of the referenced letter are met. Your facility should keep records to support compliance with above conditions.

Additionally, any sludge removed from within the proposed treatment operation will have to be managed in accordance with 40 CFR Part 262.

This letter does not preclude your facility from complying with requirements from other environmental programs and/or local government regulations.

For any questions, please contact me at (813) 623-5561.

Sincerely,

  
Armando Gonzalez  
Permitting Engineer  
Hazardous Waste Program  
Waste Management Section

AG/ab

cc: Charlie Biedermann, DER/Tallahassee (w/attachment)  
Sam Sahebzamani, DER/Tampa (w/attachment)  
Nancy Neely, Water Quality Assessment Division/  
City of St. Petersburg (w/attachment)

*Protecting Florida and Your Quality of Life*

HWDOU

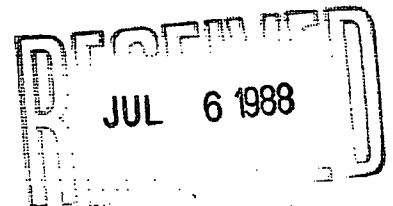


JUL 05 1988

WEST DISTRICT  
TAMPA

June 30, 1988

Mr. Armando Gonzales  
Permitting Engineer  
Department of Environmental Regulation  
4520 Oak Fair Blvd.  
Tampa, FL 33610



Dear Mr. Gonzales;

Per your request concerning the plating rinse water we analyzed for pH, Cadmium, Nickle, Cyanide and Hexavalent Chromium, the analyses were performed at three points: at tank 165 (or provided by generator), tank A and tank 001.

The sludge created after treatment was also tested for Hazardous Characteristics and is believed to be non-hazardous. However, per 40CFR, part 261, subpart D, this waste is listed as a hazardous waste, and will be treated as such.

It is my belief that these results show that the waste stream meets the requirement discussed previously.

Enclosed please find a copy of our Hazardous Waste Generator Identification Number.

If you have any questions regarding these results and our operations, please do not hesitate to call me.

Sincerely,

A handwritten signature in cursive script, appearing to read 'Allen Hajian'.

Allen Hajian  
Environmental Manager

AH/ms

Enclosures

## THORNTON LABORATORIES, INC.

TWX 810 876-9134  
THORNT LAB TPA1145 EAST CASS STREET  
TAMPA, FLORIDA 33601 - 2880  
MARINE, ANALYTICAL AND ENVIRONMENTAL SERVICESTELEPHONE (813) 223-9702  
P.O. BOX 2880

April 10, 1987

Laboratory Number 656266

Sample of Waste Alkaline Solution

Date Received 3/19/87

For General Electric Co.  
Neutron Devices Dept.  
P.O. Box 2908  
Largo, FL 34294-2908

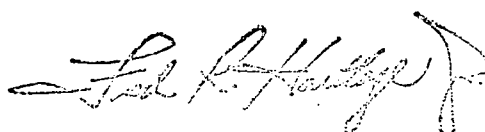
Attn: D. Delaneuville, Mail Stop 34

Marks: Sample #202, Date/Time: 2/4/87, 14:25; Sampled by: Jim/Dan; Source: Drum  
231,306,294,312 55 gal. P.O. #W7-0156-X

## CERTIFICATE OF ANALYSIS

<u>Analysis</u>	<u>Results</u>
Total Arsenic (As)	0.069 mg/kg
Total Barium (Ba)	<1.5 mg/kg
Total Cadmium (Cd)	<0.1 mg/kg
Total Chromium (Cr)	<0.25 mg/kg
Total Lead (Pb)	<0.5 mg/kg
Total Mercury (Hg)	0.016 mg/kg
Total Selenium (Se)	<0.05 mg/kg
Total Silver (Ag)	<0.25 mg/kg
% Water	95.1%
% Solids @ 105°C	4.91%
% Ash @ 555°C	3.17%
Density @ 25°C, g/ml	1.03 g/ml

THORNTON LABORATORIES, INC.



**THORNTON LABORATORIES, INC.**

1145 EAST CASS STREET

TAMPA, FLORIDA 33601 - 2880

MARINE, ANALYTICAL AND ENVIRONMENTAL SERVICES

TELEPHONE (813) 223-9702

P.O. BOX 2880

876-9134  
INT LAB TPA

April 10, 1987

Laboratory Number 656266

Sample of Waste Alkaline Solution

Date Received 3/19/87

For General Electric Co.  
Neutron Devices Dept.  
P.O. Box 2908  
Largo, FL 34294-2908

Attn: D. Delaneuville, Mail Stop 34

Marks: Sample #202, Date/Time: 2/4/87, 14:25; Sampled by: Jim/Dan; Source: Drum  
231,306,294,312 55 gal. P.O. #W7-0156-X**CERTIFICATE OF ANALYSIS  
EP TOXICITY  
CONCENTRATION OF CONTAMINANTS IN EXTRACT\***

EPA Hazardous Waste Number	Contaminant	Maximum Concentration (milligrams per liter)	Concentration Sample Extract (milligrams per liter)
D-004	Arsenic (As)	5.0	<0.5
D-005	Barium (Ba)	100.0	<10
D-006	Cadmium (Cd)	1.0	<0.1
D-007	Chromium (Cr)	5.0	<0.5
D-008	Lead (Pb)	5.0	<0.5
D-009	Mercury (Hg)	0.2	<0.02
D-010	Selenium (Se)	1.0	<0.1
D-011	Silver (Ag)	5.0	<0.5

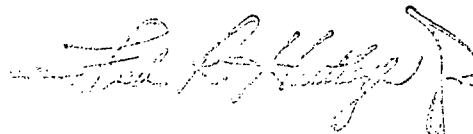
\* Prepared and analyzed in accordance with Identification and Listing of  
Hazardous Waste, EPA 8700-12 (FR) Federal Register Vol. 45, No. 98,  
May 19, 1980.

pH - 10.2

Flash Point - Does not flash below 200°F

Reactivity - Not Reactive

THORNTON LABORATORIES, INC.



**THORNTON LABORATORIES, INC.**

J 876-9134  
ANT LAB TPA

1145 EAST CASS STREET  
TAMPA, FLORIDA 33601 - 2880  
MARINE, ANALYTICAL AND ENVIRONMENTAL SERVICES

TELEPHONE (813) 223-9702  
P.O. BOX 2880

May 6, 1987

**Laboratory Number** 656266 Additional Work

**Sample of** Waste Alkaline Solution

**Date Received** 3/19/87

**For** General Electric Co.  
Neutron Devices Dept.  
P.O. Box 2908  
Largo, Fl 34294-2908

Attn: D. Delaneuville, Mail Stop 34

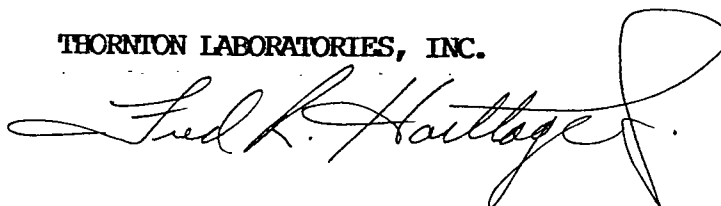
**Marks** Source: Drum 231,306,294,312 55 gal P.O.#W7-0156-X  
Sample #202, 2/4/87, 14:25 Sampled by Jim/Dan

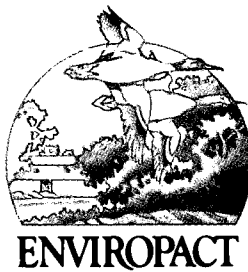
**CERTIFICATE OF ANALYSIS**

Total Copper (Cu)

130 mg/kg

**THORNTON LABORATORIES, INC.**





Howco  
843 43rd St. South  
St. Petersburg, Fl. 33711  
Attn: Mr. Tim Hagen

June 28, 1988  
Report T-6693-C  
LAB ID: #84271  
E84050  
Page 1 of 1

Samples Received: 5/23/88  
Sample Designation: Analysis as Noted  
Collected by: Your Rep.

REPORT OF ANALYSIS	G.E. T-A	G.E. T-001	UNITS
pH	10.8	11.8	
Cadmium	<0.05	<0.05	mg/l
Nickel	<0.20	<0.20	mg/l
Cyanide	<0.01	<0.01	mg/l
Hexavalent Chromium	<0.01	<0.01	mg/l

Analyses made in accordance with E.P.A., A.S.T.M., Standard Methods or other approved methods.

Respectfully submitted,

Michael T. Osinski  
Michael T. Osinski  
Laboratory Manager

## RUSSELL LABORATORIES, INC.

Mailing Address:  
1820 S. Central Ave.  
Flagler Beach, FL 32036

Lab Location:  
111 N. State St.  
Bunnell, FL 32110-2507

## WATER ANALYSIS CERTIFICATION

Sample No. R0732 Date Samp'd 3/15/88 WK Time 1 PM  
Sample of Water Date Rec'd 3/15/88 MLR Time 3 PM  
For Homac Mfg. Co. Date Anal'd 3/16/88 ALR Time 11 AM

## DETERMINATION

## RESULTS (mg/l)

Detergents, Anionic  
Boron  
Cyanide  
Copper  
Fluoride  
Chloride

0.15  
0.4  
0.01  
0.24  
15.5  
4100

Second  
Batch

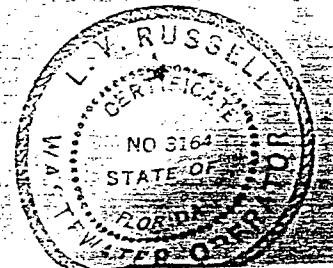
Signed M. S. Russell, Lab Director  
M. S. Russell, A.S., C.O.

Signed J. V. Russell, QA Officer  
J. V. Russell, P.E., Ch.E.

Note: Fluoride interference is approx. +0.1 mg/l per 7000 mg/l of chloride. At the concentration of Cl and Fl the test was run at, this represents <0.01 mg/l positive interference.

Lab Certification  
DHRS ID 83129  
ID 83284  
ID E82028

All Analyses Std. Meth. 16th Ed.

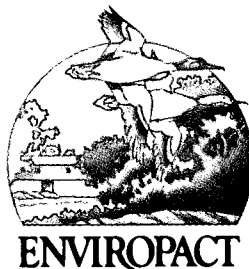


*City of  
Ormond Beach  
US EPA*

Existing Standards:	22-89 (mg/l)	433.16 (mg/l)	H <sub>2</sub> C 2/28/88 (mg/l)	HOC 2/25/88 (mg/l)	HDMAC 2/28/88 (mg/l)
Cyanides	0.01	1.20	5	0	0.01
Copper, Total	0.50	3.38	0	0	1.00
Chromium, Hexavalent	0.05		0	0	0.005
Chromium, Total	1.00	2.77	2	0	0.02
Cadmium	0.10	0.11	0	0	0.005
Zinc, Total	1.00	2.61	7	0	0.088
Cobalt	0.10		2	0	0.02
Silver	0.05	0.43	1	0	0.01
Manganese	1.00		0	0	0.005
Barium	1.00		0	0	0.05
Sulfides	0.20		0	0	
Selenium	0.01		0	0	0.005
Nickel	0.50	3.98	0	2	0.80
Fluoride	6.00		1	9	33.80
Detergents	0.50		9	0	2.80
Aluminum	1.00		0	0	1.90
Arsenic	0.05		0	0	0.005
Mercury	0.05		0	0	0.0019
Lead	0.05	0.69	0	2	0.02
Iron	0.30		0	3	0.14
Boron	1.00		2	4	1.22
Total Toxic Organics		2.13			
Oil & Grease	25.00	52.00			
Total Suspended Solids		60.00		25	6.7
pH range	6-9	6-9	8	53	8.7
Parameters that require pre-approval prior to discharge:					
BOD greater than: 300 mg/l				1	1
COD greater than: 400 mg/l				45	37
Total Suspended Solids: 300 mg/l				25	6.7
Chlorine Demand: 15 mg/l					

*First Batch*





Howco  
843 43rd Street South  
St. Petersburg, Fl. 33711  
Attn: Mr. Tim Hagen

June 28, 1988  
Report T-6693-D  
LAB ID: #84271  
E84060  
Page 1 of 1

Samples Received: 5/23/88  
Sample Designation: Analysis as Noted  
Collected by: Your Rep.

REPORT OF ANALYSIS	HOMAC T-A	HOMAC T-001	UNITS
pH	6.75	6.76	
Cadmium	<0.05	<0.05	mg/l
Nickel	<0.20	<0.20	mg/l
Cyanide	<0.01	<0.01	mg/l
Hexavalent Chromium	<0.01	<0.01	mg/l

Analyses made in accordance with E.P.A., A.S.T.M., Standard Methods or other approved methods.

Respectfully submitted,

Michael T. Osinski  
Michael T. Osinski  
Laboratory Manager



Howco  
843 43rd Street South  
St. Petersburg, Florida 33711  
Attn: Tim Hagen

June 28, 1988  
Report T-6693-B  
LAB ID: #84271  
E84060  
Page 1 of 1


Samples Received: 5/23/88  
Sample Designation: Analysis as Noted  
Collected by: Your Rep.

REPORT OF ANALYSIS	MARTIN MARIETTA T-165	MARTIN MARIETTA T.A.	UNITS
pH	10.2	11.4	
Cadmium	<0.05	<0.05	mg/l
Nickel	<0.20	<0.20	mg/l
Cyanide	<0.01	<0.01	mg/l
Hexavalent Chromium	<0.01	<0.01	mg/l

REPORT OF ANALYSIS	MARTIN MARIETTA T-001	UNITS
pH	11.6	
Cadmium	<0.05	mg/l
Nickel	<0.20	mg/l
Cyanide	<0.01	mg/l
Hexavalent Chromium	<0.01	mg/l

Analyses made in accordance with E.P.A., A.S.T.M., Standard Methods or other approved methods.

Respectfully submitted,

  
Michael T. Osinski  
Laboratory Manager

Laboratory Number 571  
Sample Type Sludge (F006)  
Date Received  
For HOWCO Environmental Services  
843 43rd Street South  
St. Petersburg, FL 33711  
Generator  
Attention Mr. Tim Hagan

CERTIFICATE OF ANALYSIS

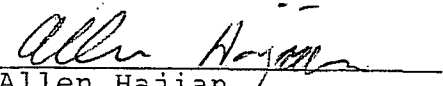
<u>LABORATORY NUMBER</u>	<u>MARKS</u>	<u>PARAMETER</u>	<u>CONCENTRATION</u>	<u>UNIT</u>
571		Arsenic	< 0.5	mg/l
		Barium	< 10.0	mg/l
		Cadmium	< 0.1	mg/l
		Chromium	< 0.5	mg/l
		Lead	< 0.5	mg/l
		Mercury	< 0.2	mg/l
		Selenium	< 0.1	mg/l
		Silver	< 0.5	mg/l

Remarks: Metals by E. P. Toxicity

Continued on Page 2

All analyses are made in accordance with E.P.A., A.S.T.M.,  
Standard Methods or other approved methods.

Respectfully submitted

  
Allen Hajian  
Environmental Chemist

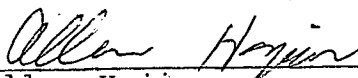
CERTIFICATE OF ANALYSIS

<u>LABORATORY NUMBER</u>	<u>MARKS</u>	<u>PARAMETER</u>	<u>CONCENTRATION</u>	<u>UNIT</u>
571		Corrosivity	not corrosive	
		pH	7.3	
		Ignitability	not ignitable	
		Flashpoint	> 200	° F
		Reactivity	not reactive	

Remarks: \_\_\_\_\_

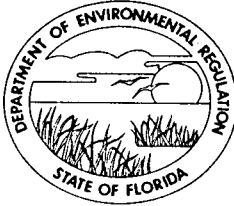
All analyses are made in accordance with E.P.A., A.S.T.M.,  
Standard Methods or other approved methods.

Respectfully submitted

  
\_\_\_\_\_  
Allen Hajian  
Environmental Chemist

STATE OF FLORIDA  
DEPARTMENT OF ENVIRONMENTAL REGULATION

TWIN TOWERS OFFICE BUILDING  
2600 BLAIR STONE ROAD  
TALLAHASSEE, FLORIDA 32399-2400



05-11-88

BOB MARTINEZ  
GOVERNOR

DALE TWACHTMANN  
SECRETARY

TIM HAGAN  
HOWCO ENVIRONMENTAL SER INC  
843 43RD ST S  
ST PETERSBURG FL 33711

The Hazardous Waste Management Program has reviewed your application for a hazardous waste DER/EPA I.D. Number. Based on the information received you have been issued the following identification number for the facility at 843 43RD ST S

Facility ID # FLD152764767  
Your facility status is the following:

Generator.

Florida Administrative code rule 17-30 requires all generators of hazardous waste and all hazardous waste treatment, storage, or disposal facilities to file an annual report of their hazardous waste activities with DER. You must comply with this rule concerning the filing of an annual report by March 1 for the preceding calendar year. Hazardous waste generators and facilities that are not subject to the annual report requirement but maintain an EPA/DER identification number are required to verify their status annually using the annual report form. The forms will be sent to the contact person. Businesses that generate less than 1000 kilograms of hazardous waste per month (small quantity generators) are not subject to these reporting or verification requirements.

If any of the information on the Hazardous Waste Activity form changes, please notify us in writing at the letterhead address. For further assistance, please call 904/488-0300.

Sincerely,

Michael X. Redig  
Environmental Supervisor II  
Hazardous Waste Section

cc: Ann Cole - EPA/Region IV  
Armando Gonzalez - DER/Tampa  
GMS-ID # 4052P00632



CITY OF ST. PETERSBURG

May 23, 1988

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

RE: SPFL-5093-86-32, Excess Purgeable Aromatics

Dear Mr. Hagan:

Your recent self analysis data for purgeable aromatics indicates that excessive amounts of these substances, especially benzene, ethylbenzene, toluene and xylene are being released into the sanitary sewer system in your wastewater. The concentrations of these substances are now more than double what they were in the November 1987 analysis.

Your present permit has been extended to 31st December 1988. This letter serves to inform you that this date must be regarded as the final compliance date for the installation and full operation of such pretreatment equipment as is necessary to reduce the total concentration of all toxic organic substances to less than 4.5mg/l.

If you have any further questions, please do not hesitate to call me at 893-7739.

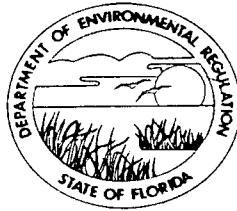
Sincerely,

Dr. J. R. Parnell  
Industrial Pretreatment Coordinator  
Water Quality Assessment Division.

STATE OF FLORIDA  
DEPARTMENT OF ENVIRONMENTAL REGULATION

SOUTHWEST DISTRICT

4520 OAK FAIR BLVD.  
TAMPA, FLORIDA 33610-7347  
813-623-5561  
Suncom-552-7612



BOB MARTINEZ  
GOVERNOR  
DALE TWACHTMANN  
SECRETARY  
DR. RICHARD D. GARRITY  
DISTRICT MANAGER

May 17, 1988

Tim's Oil Recovery, Inc.  
4320 8th Avenue South  
St. Petersburg, Florida 33711

Attn: Mr. Rick Cooper

Dear Mr. Cooper:

Any person who generates a waste is required to determine if it is a hazardous waste before disposal. If the waste is neither specifically excluded nor specifically listed then process knowledge must be applied. This means that all constituents of the waste should be examined for the possible presence of hazardous characteristics - ignitability, corrosivity, reactivity and toxicity. If it is possible that the waste has one of these characteristics, it should be tested.

The solids from washracks, floor drains and oil water separators are not likely to be ignitable, corrosive or reactive. However, the material may be contaminated with lead. To show that the material was not hazardous waste, a representative sample of the material should be tested quarterly for one year for EP toxicity with negative results. After that, no further testing would be needed unless the process changed. If the sludges are not hazardous, they may be disposed of at the municipal landfill.

Sincerely,

Elizabeth Knauss  
Environmental Supervisor  
Hazardous Waste Program

EK/br

# TIM'S OIL RECOVERY, INC.

4320 8th AVENUE SOUTH  
ST. PETERSBURG, FLORIDA 33711

April 29, 1988

Ms. Beth Knauss  
Department of Environmental Regulation  
4520 Oak Fair Blvd.  
Tampa, FL 33610

Dear Ms. Knauss;

I am writing in regards to our conversation of today about disposal of solid waste from wash racks, floor drains and water/oil separators.

A few questions that I would like to have answered are as follows:

1. It is required to perform Hazardous Characteristics tests on sludge before disposal for customer compliance?
2. How often does testing need to be done?
3. Is it a regulation that these sludges be disposed of on a regular basis? If so, how often?

Thank you very much for your assistance in this matter. If there are any questions in regards to the way these sludges are generated, feel free to call me any time at 1-800-435-8467.

Respectfully,

*Rick Cooper*  
M.S.

Rick Cooper,  
Marketing Specialist

RC/ms

MAY 03 1988

SOUTH WEST  
TAMPA



STATE OF FLORIDA  
**DEPARTMENT OF ENVIRONMENTAL REGULATION**

TWIN TOWERS OFFICE BUILDING  
2600 BLAIR STONE ROAD  
TALLAHASSEE, FLORIDA 32399-2400



05-11-88

BOB MARTINEZ  
GOVERNOR

DALE TWACHTMANN  
SECRETARY

~~TIM HAGAN~~  
~~HOWCO ENVIRONMENTAL SER INC~~  
843 43RD ST S  
ST PETERSBURG FL 33711

The Hazardous Waste Management Program has reviewed your application for a hazardous waste DER/EPA I.D. Number.

Based on the information received you have been issued the following identification number for the facility at 843 43RD ST S

Facility ID # FLD152764767  
Your facility status is the following:

Generator.

Florida Administrative code rule 17-30 requires all generators of hazardous waste and all hazardous waste treatment, storage, or disposal facilities to file an annual report of their hazardous waste activities with DER. You must comply with this rule concerning the filing of an annual report by March 1 for the preceding calendar year. Hazardous waste generators and facilities that are not subject to the annual report requirement but maintain an EPA/DER identification number are required to verify their status annually using the annual report form. The forms will be sent to the contact person. Businesses that generate less than 1000 kilograms of hazardous waste per month (small quantity generators) are not subject to these reporting or verification requirements.

If any of the information on the Hazardous Waste Activity form changes, please notify us in writing at the letterhead address. For further assistance, please call 904/488-0300.

Sincerely,

Michael X. Redig  
Environmental Supervisor II  
Hazardous Waste Section

cc: Ann Cole - EPA/Region IV  
Armando Gonzalez - DER/Tampa  
GMS-ID # 4052P00632

Form Approved. OMB No. 2050-0028. Expires 9-30-88.  
GSA No. 0246-EPA-OT

Please refer to the *Instructions for Filing Notification* before completing this form. The information requested here is required by law (*Section 3010 of the Resource Conservation and Recovery Act*).



# Notification of Hazardous Waste Activity

Comments

Approved

Date Received  
(yr. mo. day)

Pmellas  
103 SW

H	O	W	C	O	E	N	V	I	R	O	N	M	E	N	T	A	L	S	E	R	I	N	C
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Street or P.O. Box

[illegible]

City or Town \_\_\_\_\_

State

∴ ZIP Code is

P	S	T	P	E	T	E	R	S	B	U	R	G	F	L	O	R	I	D	A
---	---	---	---	---	---	---	---	---	---	---	---	---	---	---	---	---	---	---	---

2	2
---	---

1 1 1 1

Street or Route Number

C				
5	S	A	M	E

City or Town

State

ZIP Code :

Name and Title (last, first, and job title)

Phone Number (area code and number)

C									
2	T	I	M		H	A	G	A	N

8	1	3	3	2	7	8	4	6	7
---	---	---	---	---	---	---	---	---	---

A. Name of Installation's Legal Owner

B. Type of Ownership (enter code)

C									
B	T	I	M		H	A	G	A	N

CORPORATION

VI. Type of Regulated Waste Activity (Mark 'X' in the appropriate boxes. Refer to instructions.)											
--	--	--	--	--	--	--	--	--	--	--	--

### A. Hazardous Waste Activity

### B. Used Oil Fuel Activities

☒ 1a. Generator ☐ 1b. Less than 1,000 kg/mo.

☐ 2. Transporter

☐ 3. Treater/Storer/Disposer

☐ 4. Underground Injection

☐ 5. Market or Burn Hazardous Waste Fuel  
(enter "X" and mark appropriate boxes below)

☐ a. Generator Marketing to Burner

☐ b. Other Marketer

☐ c. Burner

☐ 6. Off-Specification Used Oil Fuel  
(enter 'X' and mark appropriate boxes below)

☐ a. Generator Marketing to Burner

☐ b. Other Marketer

☐ c. Burner

☐ 7. Specification Used Oil Fuel Manufacturer (or On site Burner)  
Who First Claims the Oil Meets the Specification

VII. Waste Fuel Burning: Type of Combustion Device (enter "X" in all appropriate boxes to indicate type of combustion device(s) in which hazardous waste fuel or off-specification used oil fuel is burned. See instructions for definitions of combustion devices.)

☐ A. Utility Boiler☐ B. Industrial Boiler☐ C. Industrial Furnace

VIII. Mode of Transportation (transporters only — enter 'X' in the appropriate box(es))

☐ A. Air    ☐ B. Rail    ☐ C. Highway    ☐ D. Water    ☐ E. Other (specify) \_\_\_\_\_

IX. First or Subsequent Notification

**IX. First or Subsequent Notification**

Mark 'X' in the appropriate box to indicate whether this is your installation's first notification of hazardous waste activity or a subsequent notification. If this is not your first notification, enter your installation's EPA ID Number in the space provided below.

C. Installation's EPA ID Number

☒ A. First Notification      ☐ B. Subsequent Notification (complete item C)

RECEIVED  
D.E.R.

88 MAY 10 AM 11:10

**BUREAU OF  
WASTE MANAGEMENT**

ID — For Official Use Only												
C											T/A	C
W												1

**X. Description of Hazardous Wastes (continued from front)**

A. Hazardous Wastes from Nonspecific Sources. Enter the four-digit number from 40 CFR Part 261.31 for each listed hazardous waste from nonspecific sources your installation handles. Use additional sheets if necessary.

1 F 0 0 6	2	3	4	5	6
7	8	9	10	11	12

B. Hazardous Wastes from Specific Sources. Enter the four-digit number from 40 CFR Part 261.32 for each listed hazardous waste from specific sources your installation handles. Use additional sheets if necessary.

13	14	15	16	17	18
19	20	21	22	23	24
25	26	27	28	29	30

C. Commercial Chemical Product Hazardous Wastes. Enter the four-digit number from 40 CFR Part 261.33 for each chemical substance your installation handles which may be a hazardous waste. Use additional sheets if necessary.

31	32	33	34	35	36
37	38	39	40	41	42
43	44	45	46	47	48

D. Listed Infectious Wastes. Enter the four-digit number from 40 CFR Part 261.34 for each hazardous waste from hospitals, veterinary hospitals, or medical and research laboratories your installation handles. Use additional sheets if necessary.

49	50	51	52	53	54
----	----	----	----	----	----

E. Characteristics of Nonlisted Hazardous Wastes. Mark 'X' in the boxes corresponding to the characteristics of nonlisted hazardous wastes your installation handles. (See 40 CFR Parts 261.21 — 261.24)

☐ 1. Ignitable  
(D001)

☐ 2. Corrosive  
(D002)

☐ 3. Reactive  
(D003)

☐ 4. Toxic  
(D000)

**XI. Certification**

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this and all attached documents, and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

Signature

Name and Official Title (type or print)

Date Signed

Tim Hagan, President

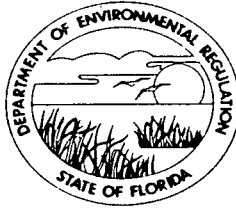
3/28/88

STATE OF FLORIDA  
DEPARTMENT OF ENVIRONMENTAL REGULATION

SOUTHWEST DISTRICT

4520 OAK FAIR BLVD.  
TAMPA, FLORIDA 33610-7347

813-623-5561  
Suncom—552-7612



BOB MARTINEZ  
GOVERNOR

DALE TWACHTMANN  
SECRETARY

DR. RICHARD D. GARRITY  
DISTRICT MANAGER

April 6, 1988

Tim's Oil Recovery  
4320 8th Avenue South  
St. Petersburg, Florida 33711

Attn: Mr. Ron Garrett

Dear Mr. Garrett:

Enclosed is the information you requested. If you have any questions, please call me at (813) 623-5561.

Sincerely,

Elizabeth Knauss  
Environmental Supervisor  
Hazardous Waste Program

EK/br



*San*  
*4/30*

March 25, 1988

Mr. Armando Gonzalez  
Department of Environmental Regulation  
4520 Oak Fair Blvd.  
Tampa, FL 33610

Dear Mr. Gonzalez;

This letter is in response to your letter of March 16. Mr. Zahebzamani of the Industrial Waste Division has been contacted and he plans to send one of his inspectors to our facility. However, no date has been set. As for the result of analysis of the proposed waste stream, before and after treatment, it will be sent to you within 30 to 60 days from the date of this letter.

The effluent produced in Tank 001 (sludge dewatering operation) will be collected and disposed of in POTW.

If you have any questions, please contact me at 1-800-334-6926.

Your time and effort is greatly appreciated.

Sincerely,

A handwritten signature in cursive script, appearing to read 'Allen Hajian', is written over the typed name.

Allen Hajian,  
Environmental Manager

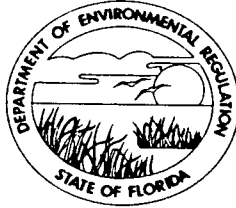
AH/ms

D. H. R.

MAR 28 1988

SOUTH WEST DISTRICT  
TAMPA

STATE OF FLORIDA  
DEPARTMENT OF ENVIRONMENTAL REGULATION



SOUTHWEST DISTRICT

4520 OAK FAIR BLVD.  
TAMPA, FLORIDA 33610-7347

813-623-5561  
Suncom—552-7612

BOB MARTINEZ  
GOVERNOR

DALE TWACHTMANN  
SECRETARY

DR. RICHARD D. GARRITY  
DISTRICT MANAGER

March 16, 1988

Allen Hajian  
Environmental Chemist  
HOWCO Environmental Services, Inc.  
843 43rd Street South  
St. Petersburg, Florida 33711

Re: HOWCO Environmental Services, Inc.  
Treatment of electroplating wastewater treated effluent

Dear Mr. Hajian:

This letter is in response to your request of March 9, 1988 for determination on permitting and other regulatory requirements for the proposed wastestream referenced above.

The operation you are proposing is not subject to hazardous waste permitting for treaters and requirements for transporter (40 CFR Parts 264 and 263) as long as all the following conditions are met:

1. The proposed wastestream does not meet any of the characteristics of hazardous waste as defined in 40 CFR Part 261, Subpart C.
2. The proposed wastestream has not and will not be mixed with any waste listed in 40 CFR Part 261, Subpart D.
3. The proposed wastestream is exclusive of "sludge" as defined in 40 CFR Part 260.10.

Should any of the above conditions not be met, a revaluation of permitting requirements will be necessary to determine the applicability of the exemption in 40 CFR Part 264.1(g)(6) to an off-site facility.

However, your facility will become a generator of hazardous waste (F006) and subject to 40 CFR Part 262. Let me advise you that an EPA I.D. number couldn't be found in our files for your facility.

Mr. Allen Hajian  
HOWCO Environmental Services, Inc.  
March 16, 1988  
Page Two

In this letter we are providing you with a determination on the regulatory status of the proposed wastestream and its treatment operation at your facility, which will be subject to final ratification upon our review of the following information:

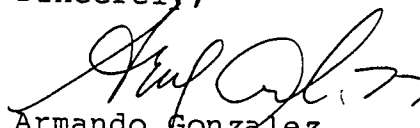
- a. Total analysis results of the proposed wastestream for hexavalent chromium, cadmium, nickel, cyanide (complexed), and pH.
- b. Total analysis results of the wastewater effluent from the treatment operation in tank A for the same parameters mentioned in a. above except pH.
- c. The same results for the same parameters as in b. above for the wastewater effluent from the treatment operation in tank 001.
- d. Disposal method for the wastewater mentioned in c. above.

Your reply acknowledging this letter, providing us with estimated dates for the submittals of the information requested in items a, b and c, and in response to item d. above, will be the next step in the resolution of this issue. You are required to contact Sam Sahebzamani of this office to address Industrial Waste concerns.

OK  
response  
3/25/88

For any questions, please contact me at 813/623-5561.

Sincerely,

  
Armando Gonzalez  
Permitting Engineer  
Hazardous Waste Program

AG/br

cc: Sam Sahebzamani - DER/Tampa  
Charlie Biedermann - DER/Tallahassee  
Nancy Neely - Water Quality Assessment Div./City of  
St. Petersburg



Compliance

①

March 9, 1988

Mr. Armando Gonzales  
District Manager  
Department of Environmental Regulation  
4520 Oak Fair Blvd.  
Tampa, FL 33610-7347

Dear Mr. Gonzales;

Enclosed please find a simplified version of HOWCO Environmental Services' water treatment plant. As you know, we would like to treat and dispose of waste water from plating plants which do not meet the following:

Any of the characteristics of hazardous waste as defined in 40 Code of Federal Regulation (CFR) Part 261 subpart C; will not be mixed with any wastes listed in 40 CFR Part 261 Subpart D; and will consist of treated effluent exclusive of "sludge" as defined in 40 CFR Part 260.10, to be exempt from hazardous waste generator and transporter requirements.

To ensure the above is true, all generators must provide the pertinent data.

This water is pumped from a designated tanker (#606) to storage tank #165, which has a capacity of 20,000 gallons. This water is then pumped into treatment tank A (capacity 7,800 gallons). The treatment is done by precipitating out metal hydroxides and flocculating the suspended solids and separating the sludge and treated water using the dissolved air flotation method. The water is then filtered and stored in a tank prior to discharge, at a rate of 10 gallons per minute, to the City of St. Petersburg water treatment plant #5, which is the southwest location. This discharge is regulated by the City of St. Petersburg.

The sludge, on the other hand, is pumped to the sludge treatment section of HOWCO for storage (tank 001; capacity 2,000 gallons) and dewatering. After dewatering, the sludge is then placed in drums and shipped as an F006 waste to a hazardous landfill in Louisiana, through Intersol Industries, Inc.

MAR 11 1988

SOUTH WEST DIST.



I would like to stress the fact that neither the waste water nor the sludge will come into contact with any other waste water or sludge. If, however, the waste water or sludge does happen to contaminate other waters or sludges, all of the sludge produced from the waste water and other sludges will be treated as an F006 sludge and will be disposed of as outlined.

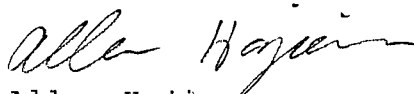
I have also enclosed our permits, licenses and two pictures. Unfortunately, Nancy Neely is no longer with the City of St. Petersburg, and no one there has been able to tell us what levels of COD, BOD, etc. are acceptable so that we can properly address them. Therefore, we haven't increased our flow rate.

As to the pictures of our plant, it has been modified slightly since the pictures were taken. The modifications were made to ease the plant operation. We have also installed an automated turbidimeter, automatic feed system and automated pH control system.

I would like to invite you and/or your colleagues to visit and inspect our plant and gain more insight into all of our operations.

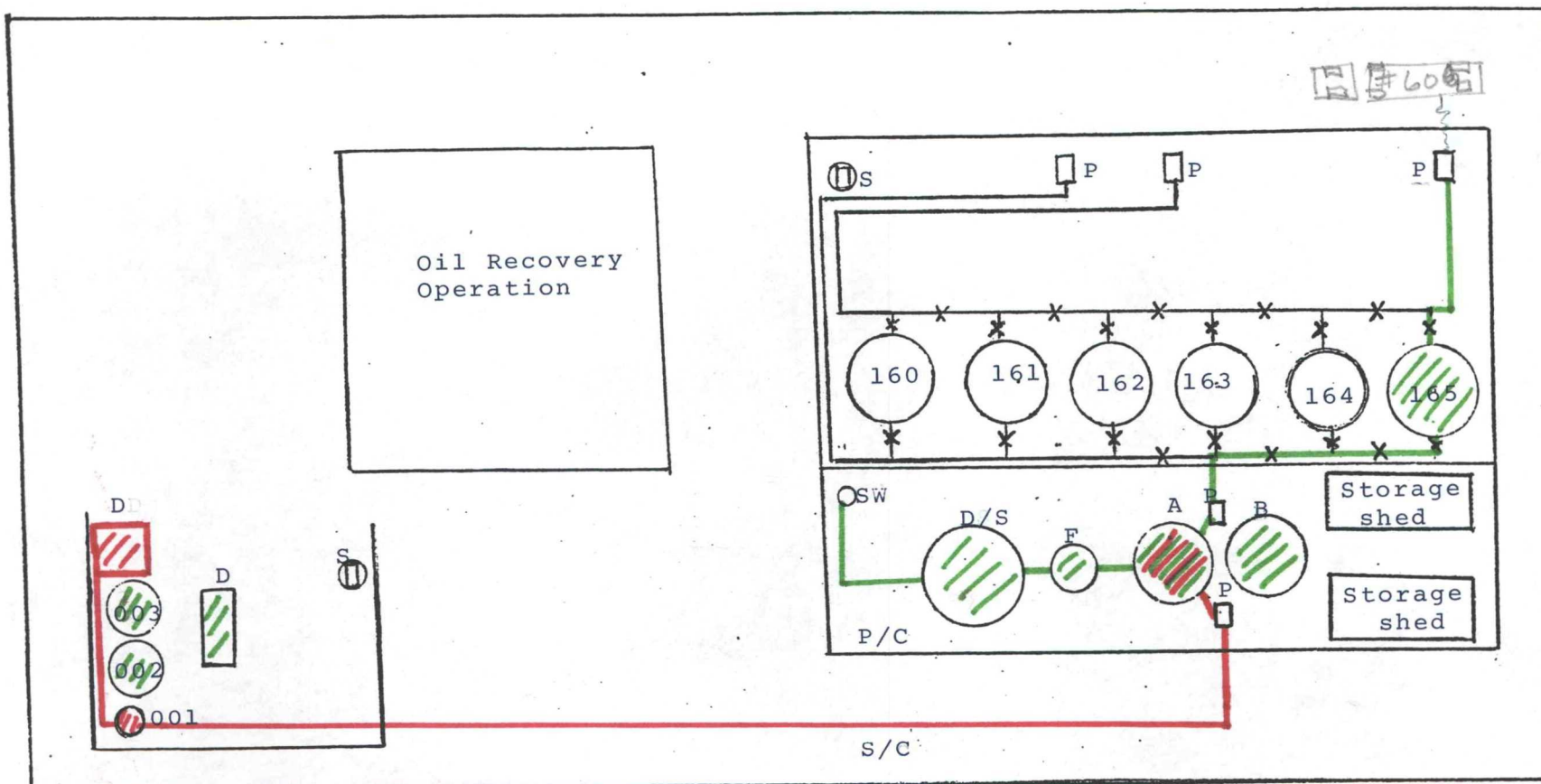
Your time and effort is greatly appreciated. We look forward to hearing from you.

Respectfully,

  
Allen Hajian,  
Environmental Chemist

AH/ms

Enclosures



- 160 - 164 Storage for untreated petroleum contaminated water (80,000 gallons)  
 165 Untreated plating waste water (20,000 gallons)  
 001 F006 Sludge  
 002 - 003 Non-hazardous sludge  
 A Treatment tank for plating waste water (7,800 gallons)  
 B Treatment tank for petroleum contaminated water (16,000 gallons)  
 D Sludge dewatering  
 F Filter  
 P Pump  
 S Sump

- D/S Discharge storage of treated waste  
 P/C Primary containment  
 S/C Secondary containment  
 SW Sewer  
 — Non-hazardous plating waste water  
 — F006 sludge



State of Florida  
Department of Environmental Regulation

*Be it known that*  
HOWCO Environmental Services, Inc.

*also known as*

*is hereby registered as a used oil*

Transporter, Collection Facility, and Recycling Facility

*in compliance with Florida Administrative Code Rule 17-7, Part V.*

*The Department of Environmental Regulation hereby issues registration number* 50119-UO (Renewal)  
*on the* 1st *day of* July *19* 87 *This registration will expire June 30, 19* 88.