

SITE PHOTOGRAPHS

DATE TAKEN: AUGUST 17, 2001

TAKEN BY: JIM DREGNE

SITE/LOCATION: HOWCO ENVIRONMENTAL SERV./843 43rd ST. SOUTH, ST. PETERSBURG, FL

DESCRIPTION:



DRAW NORTH ARROW

DESCRIPTION:



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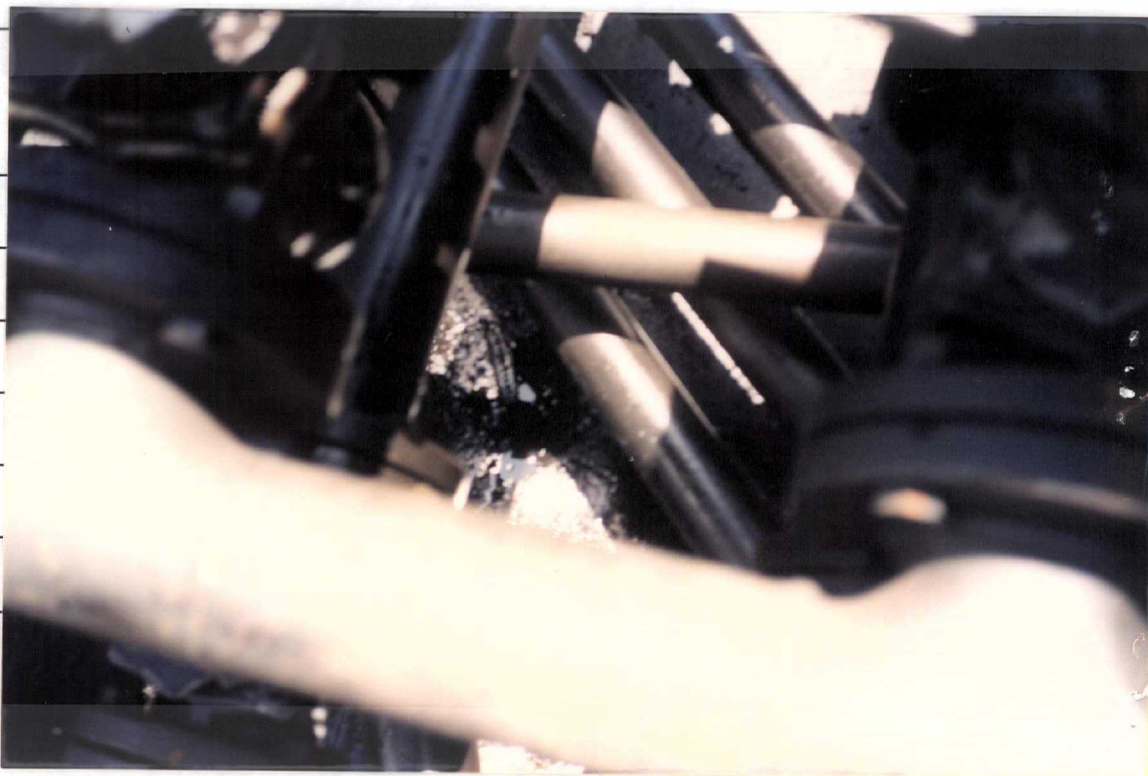
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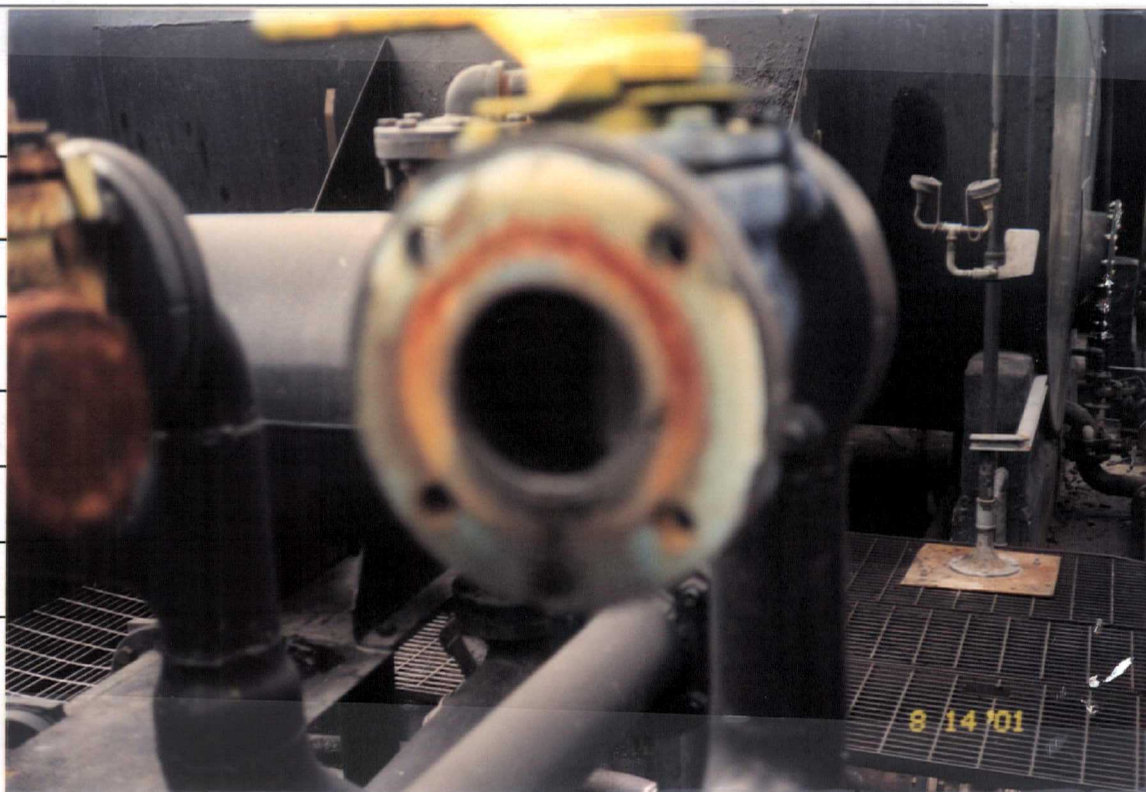
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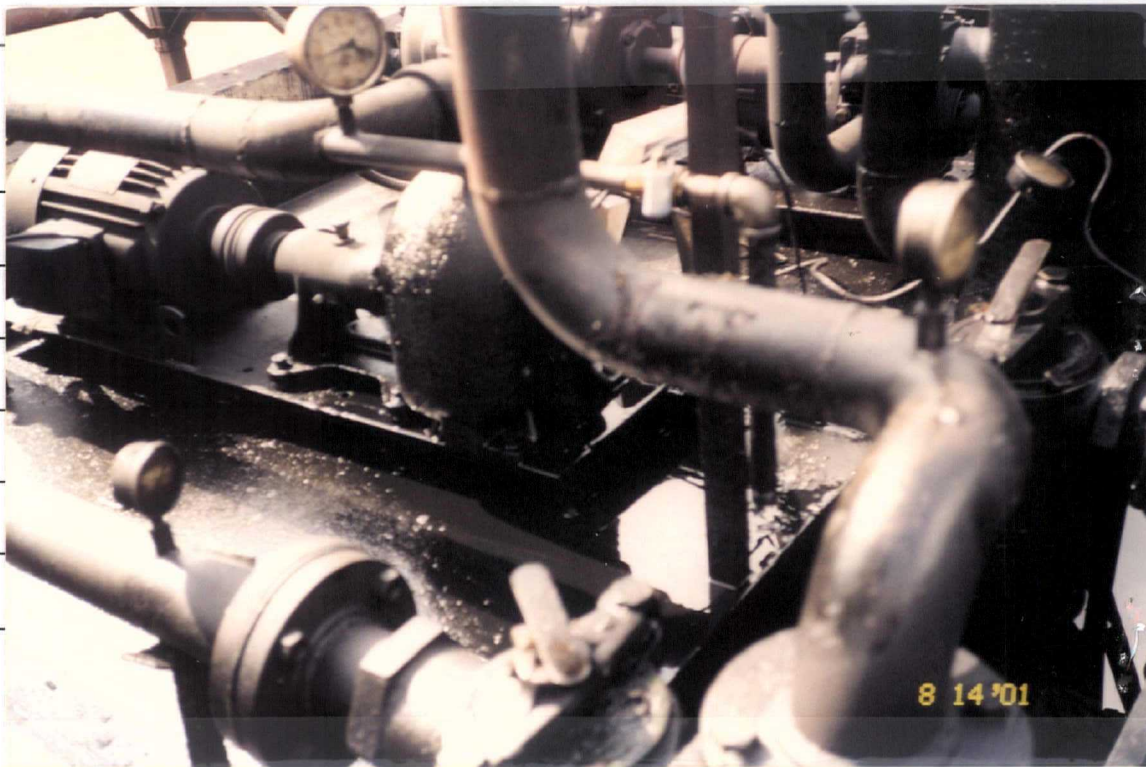
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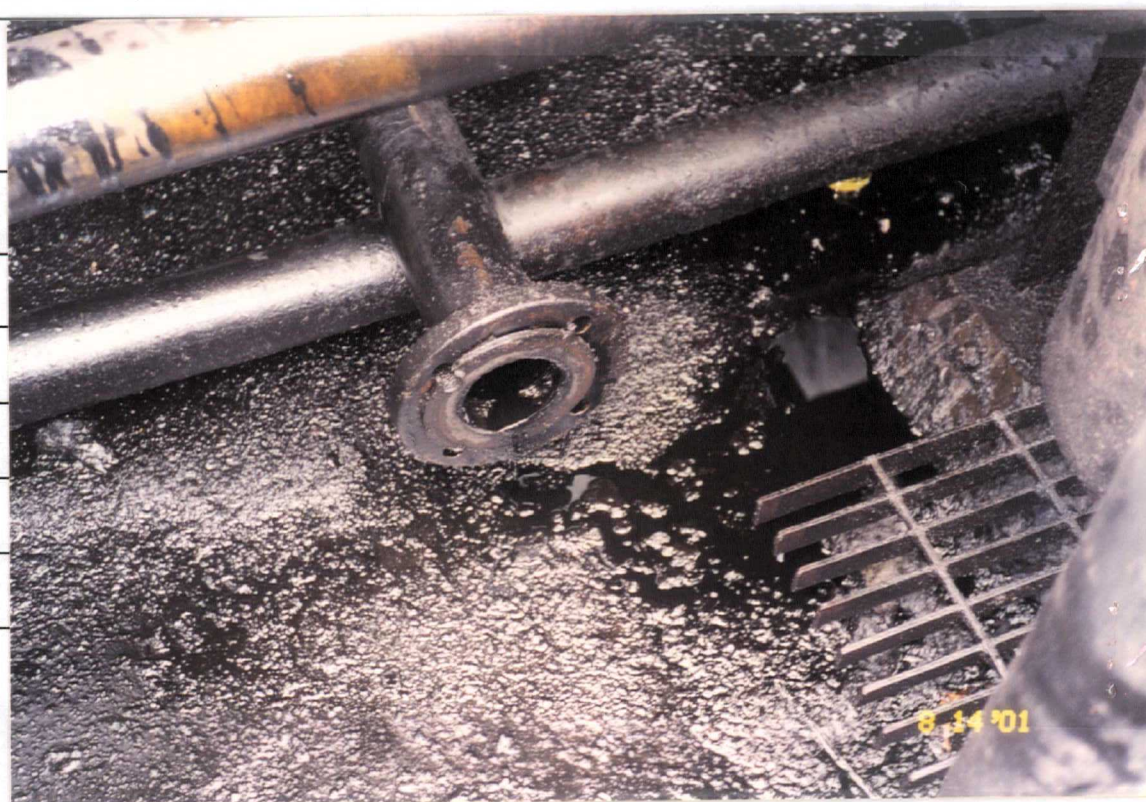
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TAKEN BY: JIM DREGNE/KELLY HONEY

SITE/LOCATION: HOWCO ENVIRONMENTAL SERV./843 43rd ST. SOUTH, ST. PETERSBURG, FL

DESCRIPTION:

- INCOMING storage tanks
- re-refining tanks in background



DRAW NORTH ARROW



DESCRIPTION:

- inside secondary containment
- sump in foreground
- new wall



DRAW NORTH ARROW:



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SITE/LOCATION: HOWCO ENVIRONMENTAL SERV./843 43rd ST. SOUTH, ST. PETERSBURG, FL

DESCRIPTION:

DRAW NORTH ARROW



DESCRIPTION:

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DATE TAKEN: AUGUST 13, 2001

TAKEN BY: JIM DREGNE/KELLY HONEY

SITE/LOCATION: HOWCO ENVIRONMENTAL SERV./843 43rd ST. SOUTH, ST. PETERSBURG, FL

DESCRIPTION:

- used oil filter crushing
AREA
- uncrushed used oil
filter hopper,

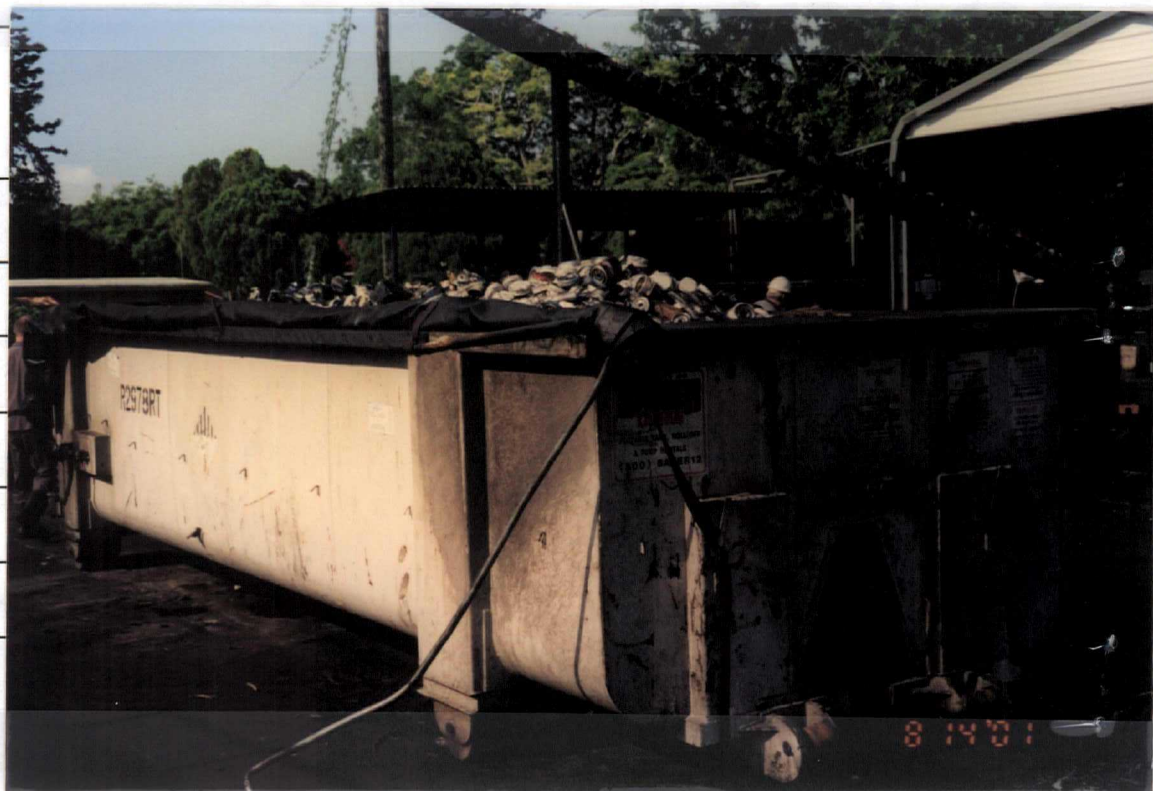
DRAW NORTH ARROW



DESCRIPTION:

- crushed used oil
filter roll-off.

DRAW NORTH ARROW:



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DATE TAKEN: AUGUST 13, 2001

TAKEN BY: JIM DREGNE/KELLY HONEY

SITE/LOCATION: HOWCO ENVIRONMENTAL SERV./843 43rd ST. SOUTH, ST. PETERSBURG, FL

DESCRIPTION:

- filter press

DRAW NORTH ARROW



DESCRIPTION:

- oil and water on
pavement near
filter press

DRAW NORTH ARROW:



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DATE TAKEN: AUGUST 13, 2001

TAKEN BY: JIM DREGNE/KELLY HONEY

SITE/LOCATION: HOWCO ENVIRONMENTAL SERV./843 43rd ST. SOUTH, ST. PETERSBURG, FL

DESCRIPTION:

- drum storage area
- damaged pavement
- sealant coming off

DRAW NORTH ARROW



DESCRIPTION:

- drum storage area
- damaged pavement
- sealant coming off

DRAW NORTH ARROW:



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DATE TAKEN: AUGUST 13, 2001

TAKEN BY: JIM DREGNE/KELLY HONEY

SITE/LOCATION: HOWCO ENVIRONMENTAL SERV./843 43rd ST. SOUTH, ST. PETERSBURG, FL

DESCRIPTION:

- oil in secondary
containment



DRAW NORTH ARROW

DESCRIPTION:

- oil in secondary
containment.



DRAW NORTH ARROW:

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TAKEN BY: JIM DREGNE/KELLY HONEY

SITE/LOCATION: HOWCO ENVIRONMENTAL SERV./843 43rd ST. SOUTH, ST. PETERSBURG, FL

DESCRIPTION:

-oil and mud in
secondary contain-
ment.

DRAW NORTH ARROW



DESCRIPTION:

-oil and water
in secondary
containment

DRAW NORTH ARROW:



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DESCRIPTION:

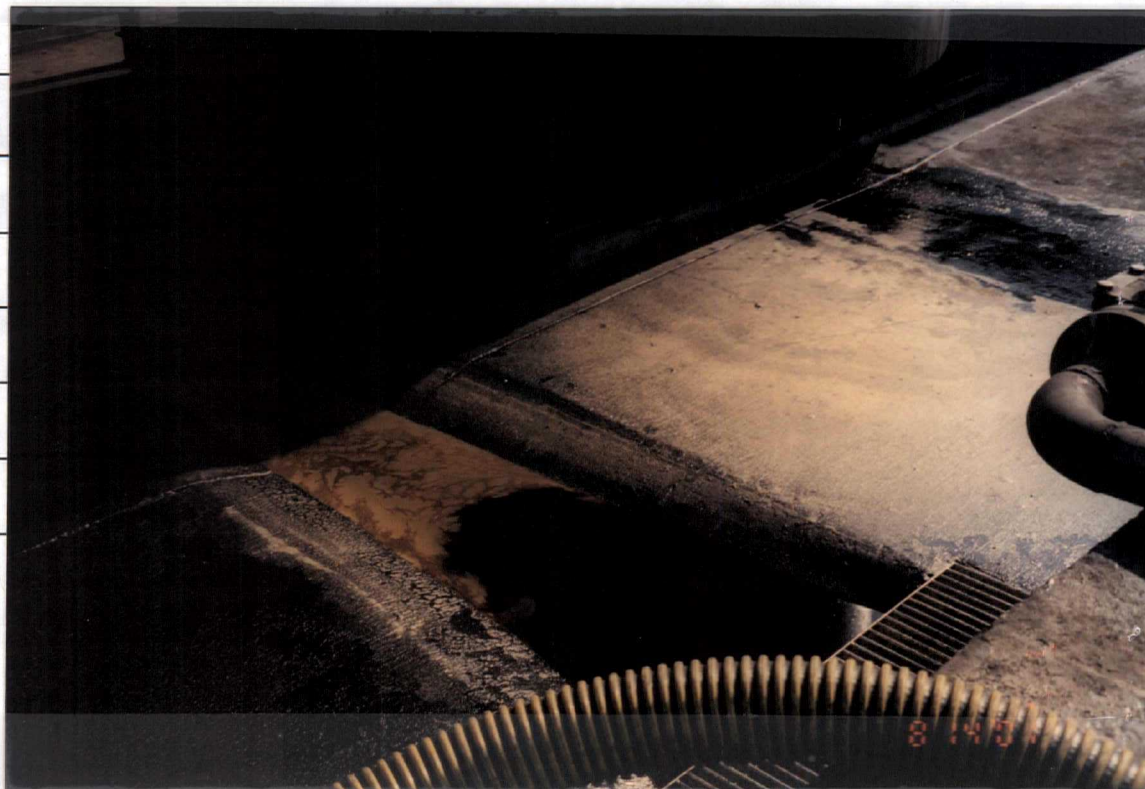
DRAW NORTH ARROW



DESCRIPTION:

- oil and water in
secondary containment

DRAW NORTH ARROW:



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SITE/LOCATION: HOWCO ENVIRONMENTAL SERV./843 43rd ST. SOUTH, ST. PETERSBURG, FL

DESCRIPTION:



DRAW NORTH ARROW

DESCRIPTION:

-crushed drums
in roll-off. oil
inside some drums
-oil in bottom
of roll-off.



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SITE/LOCATION: HOWCO ENVIRONMENTAL SERV./843 43rd ST. SOUTH, ST. PETERSBURG, FL

DESCRIPTION:

- crushed drum
- roll-off
- oil staining from
- roll-off

DRAW NORTH ARROW



DESCRIPTION:

- oil spill from
- crushed drum
- roll-off

DRAW NORTH ARROW:



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TAKEN BY: JIM DREGNE/KELLY HONEY

SITE/LOCATION: HOWCO ENVIRONMENTAL SERV./843 43rd ST. SOUTH, ST. PETERSBURG, FL

DESCRIPTION:

- Mulch pile
- mulch used as
solidifying agent

DRAW NORTH ARROW



DESCRIPTION:

- mulch pile

DRAW NORTH ARROW:



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SITE/LOCATION: HOWCO ENVIRONMENTAL SERV./843 43rd ST. SOUTH, ST. PETERSBURG, FL

DESCRIPTION:

- Mutch & solid
waste in roll-off

DRAW NORTH ARROW



DESCRIPTION:

only waste and
solid waste in
roll-off

DRAW NORTH ARROW:



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SITE/LOCATION: HOWCO ENVIRONMENTAL SERV./843 43rd ST. SOUTH, ST. PETERSBURG, FL

DESCRIPTION:

-damaged pave-
ment

DRAW NORTH ARROW



DESCRIPTION:

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DESCRIPTION:



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DRAW NORTH ARROW:

Howco Environmental
Services

9/17/99 and

10/11/99



Howco Environmental Services

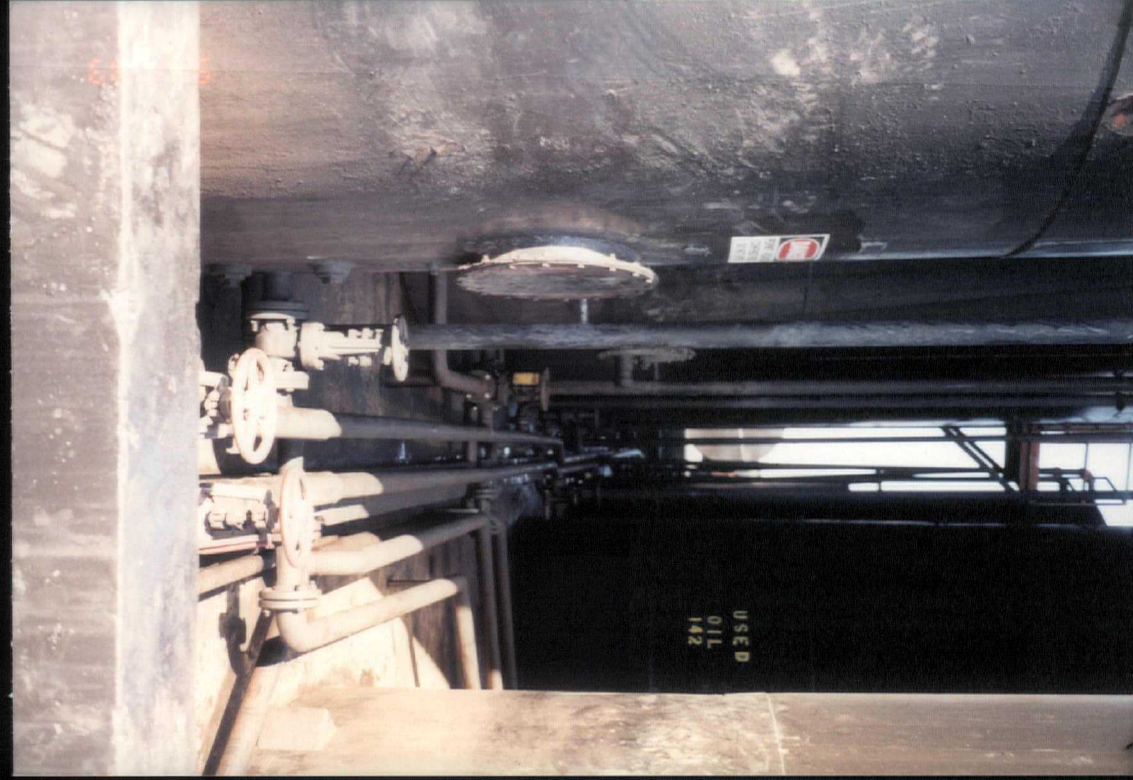
9/17/99

Howco Environmental Services

9/17/99

Howco Environmental Services

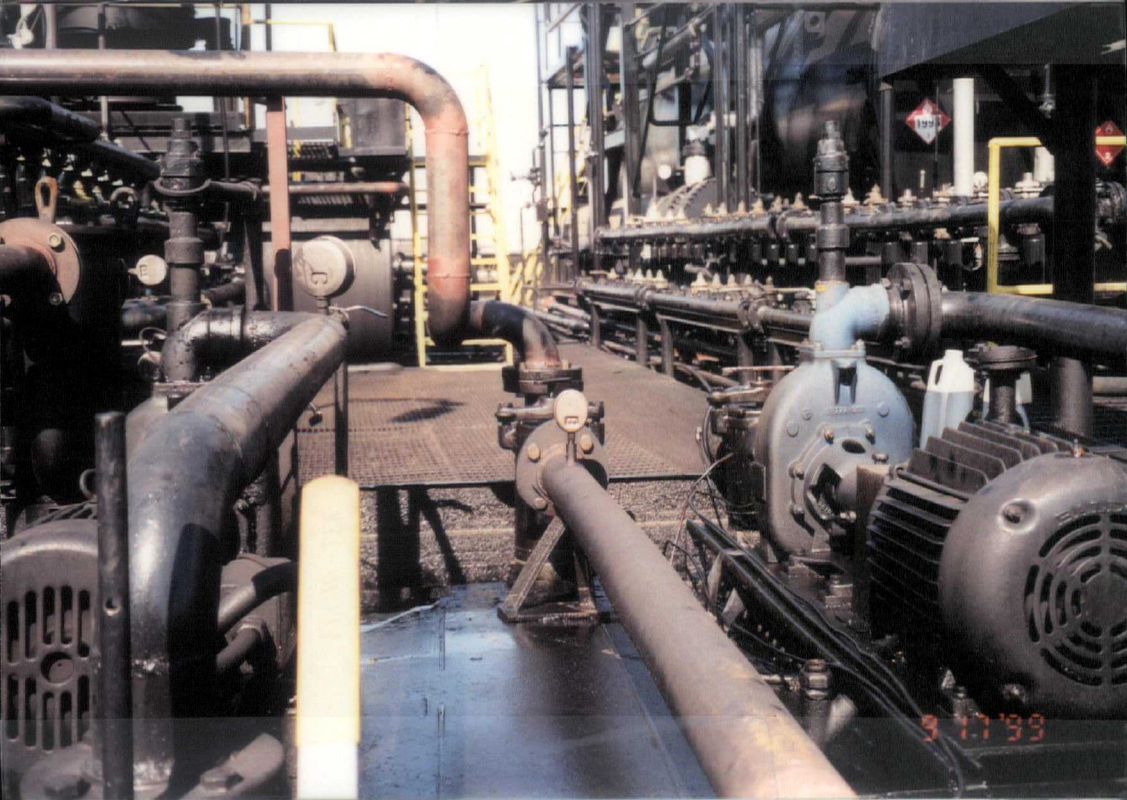
9/17/99



Howco Environmental Services
9/17/99

Howco Environmental Services
9/17/99

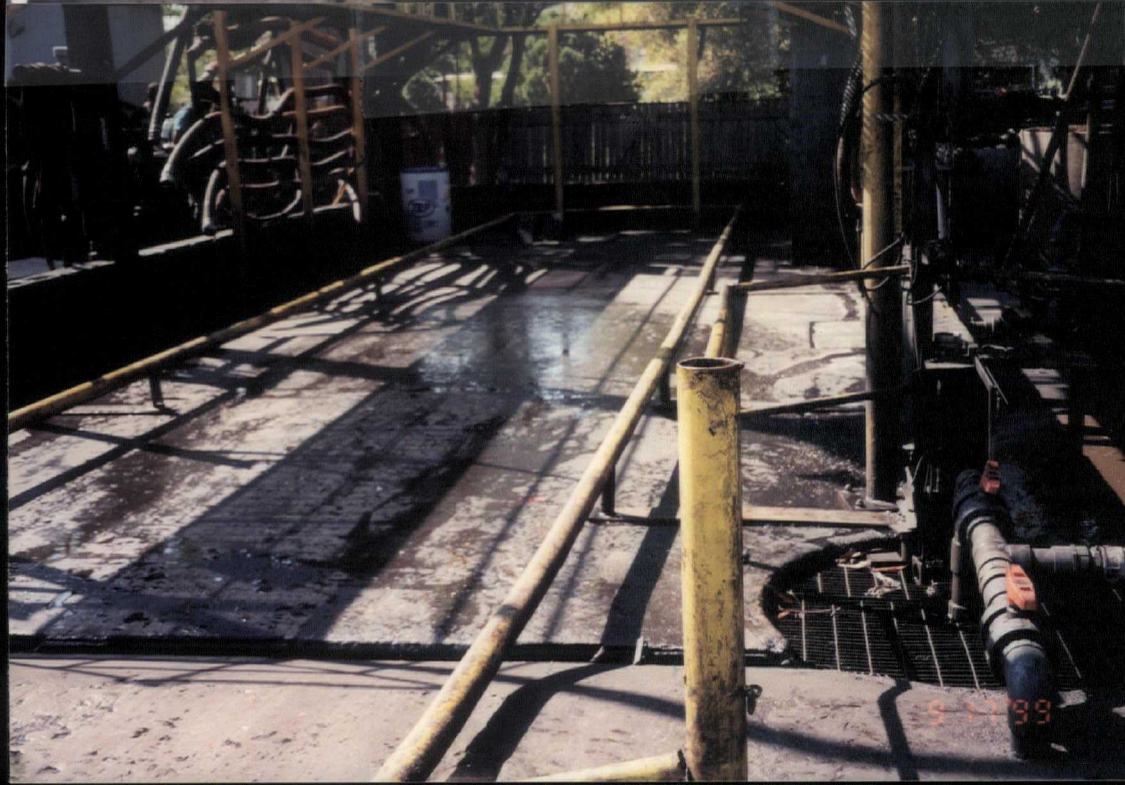
Howco Environmental Services
9/17/99



Howco Environmental Services
9/17/99

Howco Environmental Services
9/17/99

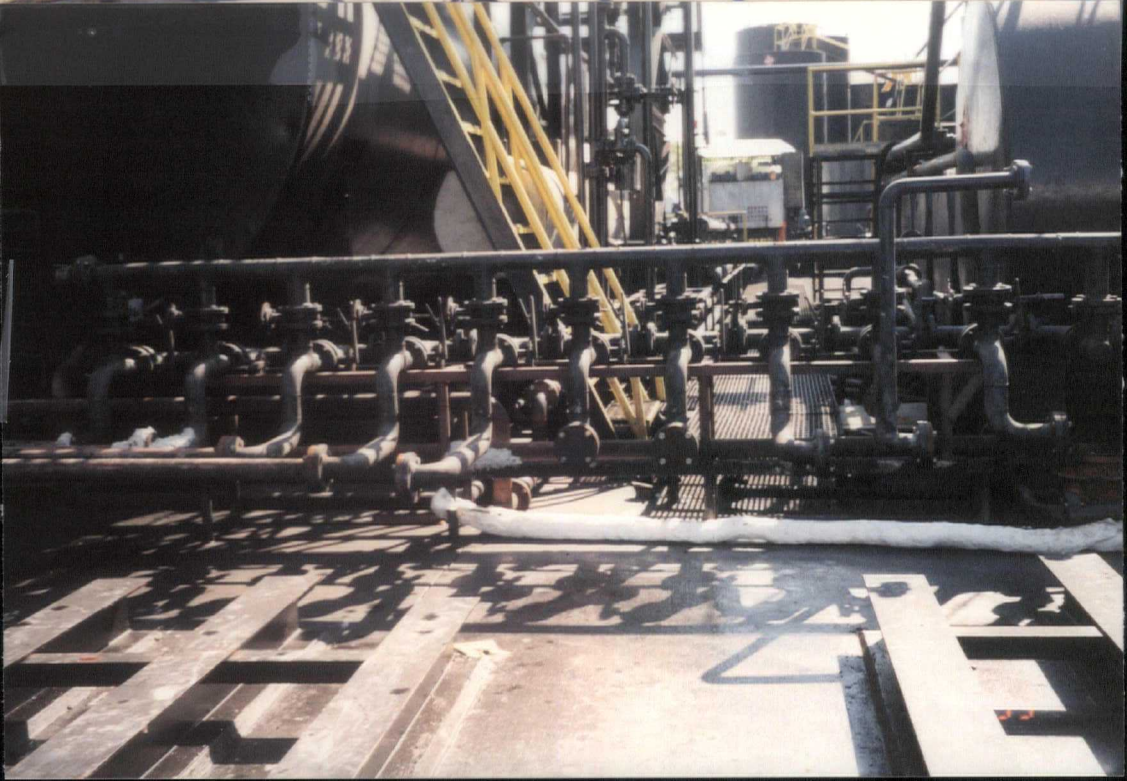
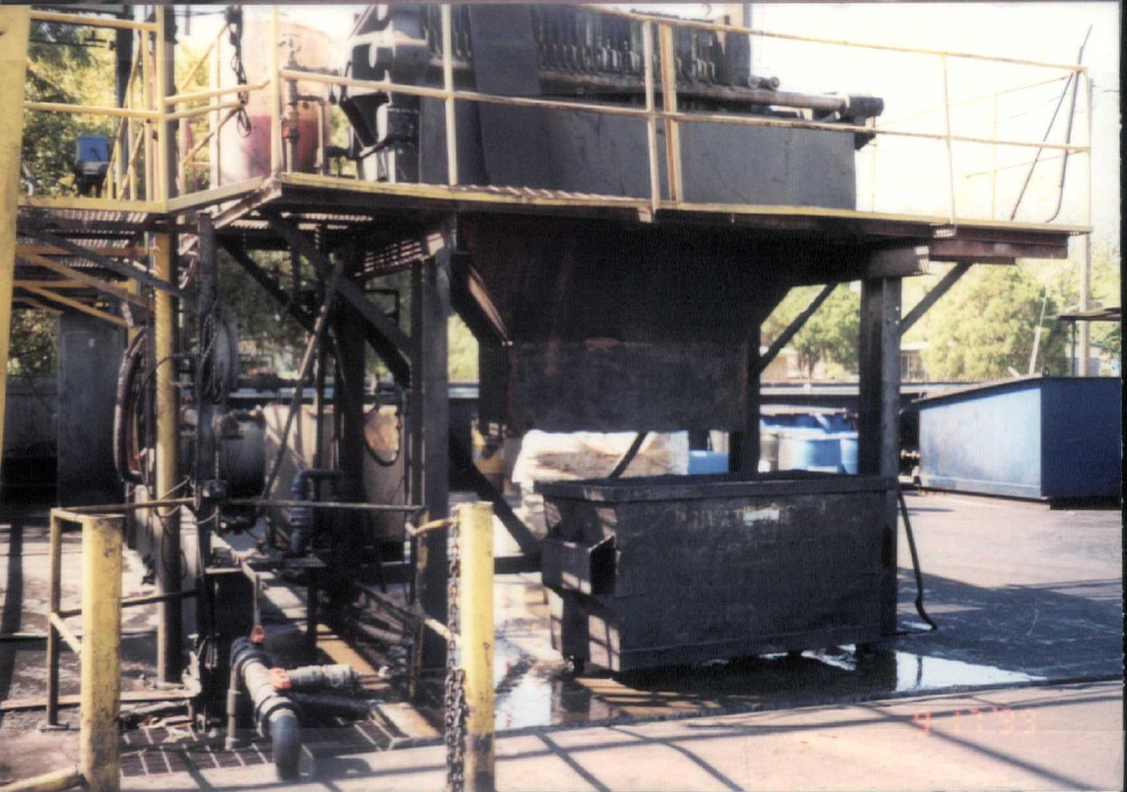
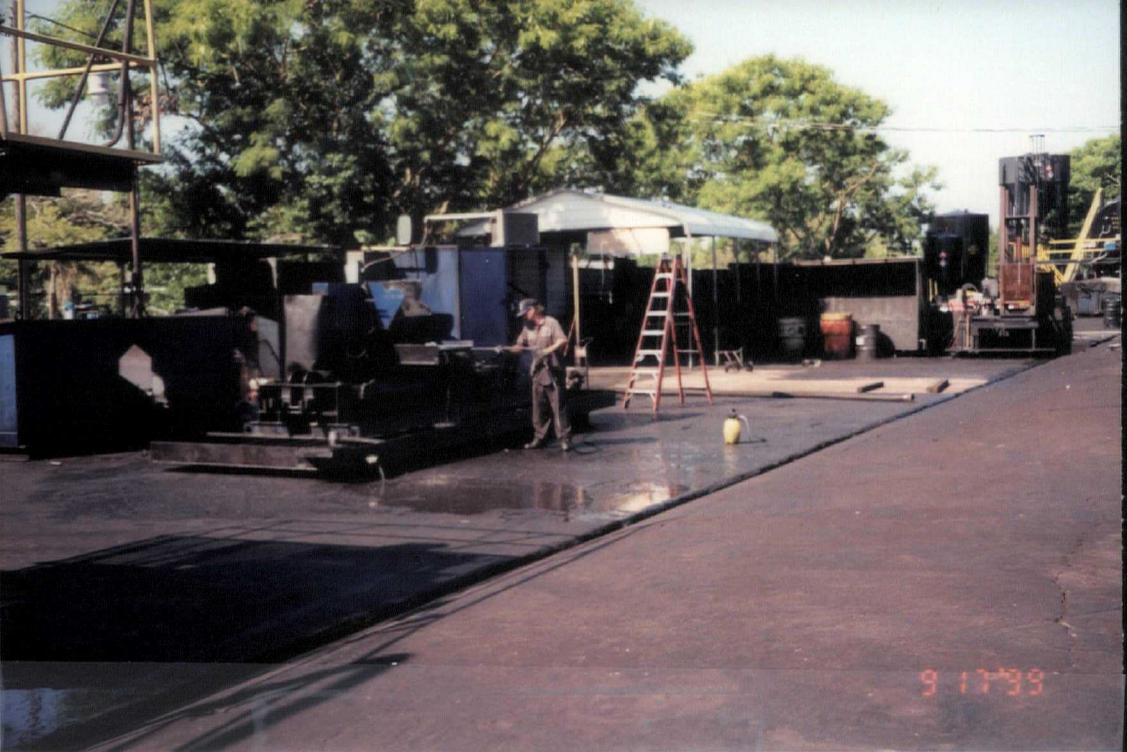
Howco Environmental Services
9/17/99



Howco Environmental
Services

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9/17/99



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Howco Environmental
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Howco Environmental
Services

9/17/99

Howco Environmental

① SW insp. 10/19/90.

HW ~~Inspection~~ Sludge Sampling 7/12/99.



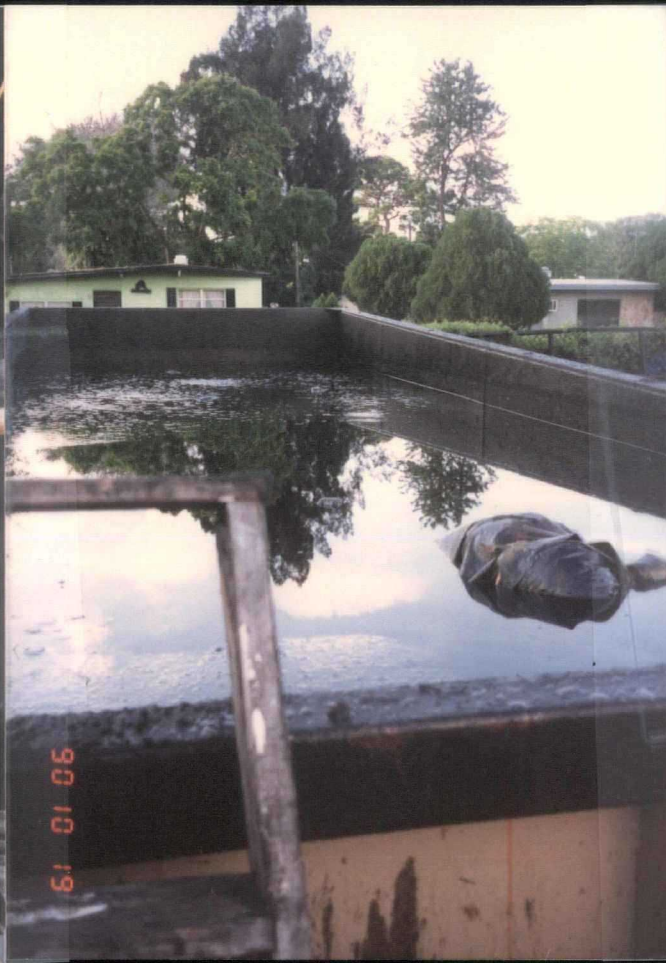


















Howco Environ. Services

843 43rd St. S.

photo by R. Strauss 12Jul99

St. Petersburg, FL

(camera imprint date in error)

Howco Environ. Services

843 43rd St. S.

photo by R. Strauss 12Jul99

St. Petersburg, FL

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Howco Environ. Services
843 43rd St. S. photo by R. Strauss 12Jul99
St. Petersburg, FL (camera imprint date in error)

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Howco Environ. Services
843 43rd St. S. photo by R. Strauss 12Jul99
St. Petersburg, FL (camera imprint date in error)



7/1/99



7/1/99

Howco Environ. Services

843 43rd St. S.

photo by R. Strauss 12Jul99

St. Petersburg, FL

(camera imprint date in error)

Howco Environ. Services

843 43rd St. S.

photo by R. Strauss 12Jul99

St. Petersburg, FL

(camera imprint date in error)



Kodak PREMIUM
PROCESSING

NOTES:

0011 A43680pab:156389

Index Print

September 02, 1999



Index Print
September 02, 1999

0011 A43680pab:156389

NOTES:

Kodak PREMIUM
PROCESSING



Howco Environ. Services

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photo by R. Strauss 12Jul99

St. Petersburg, FL

(camera imprint date in error)



Howco Environ. Services

843 43rd St. S.

photo by R. Strauss 12Jul99

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843 43rd St. S.

photo by R. Strauss 12Jul99

St. Petersburg, FL

(camera imprint date in error)

Howco Environ Services

843 43rd St. S.

St. Petersburg, FL

Photo by R Strauss 12/Jul/99

(camera date in error)



**DO NOT ADD ANY ADDITIONAL
MATERIAL TO THIS FILE.**

Coal tar
contaminants

Oil & water \neq gassy
water



Jeb Bush
Governor

Department of Environmental Protection

Southwest District
3804 Coconut Palm Drive
Tampa, Florida 33619

David B. Struhs
Secretary

July 26, 2002

Mr. Tim Hagan
HOWCO Environmental Services
3701 Central Avenue
St. Petersburg, FL 33713

RE: Settlement Agreement, OGC Case No. 02-0702
HOWCO Environmental Services
EPA ID# FLD 152 764 767
Pinellas County

Dear Mr. Hagan:

Enclosed is a copy of the executed Settlement Agreement for the referenced case.

In order to close this case, you have agreed to pay in settlement the amount of \$10,000.00, along with \$100.00 to reimburse the Department costs, for a total of \$10,100.00. The payment shall be made in 10 monthly installment payments. The first payment of \$1,010.00 is due on August 5, 2002. The initial payment shall be followed by nine equal monthly payments of \$1,010.00. Payments are due on the 5th of each month. Final payment is due no later than May 5, 2003.

Your continued cooperation is appreciated. If you have any question please call me at (813) 744-6100, extension 410.

Sincerely,

James M. Dregne
Environmental Specialist III
Division of Waste Management

JMD/jd

Enclosure

cc: Kathy Carter, OGC
Steven Ray, HWR Section
Jeff Pallas, US EPA Region IV
Compliance File

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Jeb Bush
Governor

Department of Environmental Protection

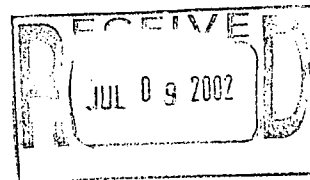
Southwest District
3804 Coconut Palm Drive
Tampa, Florida 33619

David B. Struhs
Secretary

**CERTIFIED MAIL
RETURN RECEIPT REQUESTED**

July 8, 2002

Tim Hagan
HOWCO Environmental Services
3701 Central Avenue
St. Petersburg, Florida 33713



Re: Proposed Settlement of HOWCO Environmental Services
OGC File No.: 02-0702

Dear Mr. Hagan

The purpose of this letter is to complete the resolution of the matter previously identified by the Department in the Warning Letter dated November 5, 2001, a copy of which is attached. The corrective actions required to bring your facility into compliance have been performed. The Department finds that you are in violation of the rules and statutes cited in the attached Warning Letter. In order to resolve the matters identified in the attached Warning Letter, you are assessed civil penalties in the amount of \$10,000.00, along with \$100.00 to reimburse the Department costs, for a total of \$10,100.00. The Department acknowledges that the payment of these civil penalties by you does not constitute an admission of liability. This payment must be made payable to the Department of Environmental Protection by cashier's check or money order and shall include the OGC File Number assigned above and the notation "Ecosystems Management and Restoration Trust Fund." Payment shall be sent to the Department of Environmental Protection, 3804 Coconut Palm Drive, Tampa, Florida, 33619-8318. The payment shall be made in ten equal monthly installment payments of \$1,010.00 commencing within ten (10) days of your signing this letter. Final payment is due no later than April 25, 2003. Failure to timely make any installment payment will allow the Department, at its discretion, to accelerate the balance which will become immediately due.

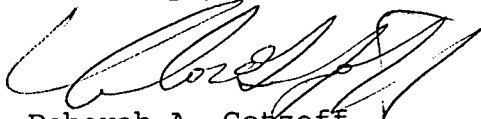
Your signing this letter constitutes your acceptance of the Department's offer to resolve this matter on these terms. If you elect to sign this letter, please return it to the Department at the address indicated above. The Department will then countersign the letter and file it with the Clerk of the Department. When the signed letter is filed with the Clerk, the letter shall constitute final agency action of the Department which shall be enforceable pursuant to Section 120.69 and 403.121, Florida Statutes.

"More Protection, Less Process"

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If you do not sign and return this letter to the Department at the District address by July 25, 2002, the Department will assume that you are not interested in settling this matter on the above described terms, and will proceed accordingly. None of your rights or substantial interests are determined by this letter unless you sign it and it is filed with the Department Clerk.

Sincerely yours,



Deborah A. Getzoff
Director of District Management
Southwest District

FOR THE RESPONDENTS:

I, Tim Hagan on behalf of HOWCO Environmental Services, **HEREBY ACCEPT THE TERMS OF THE SETTLEMENT OFFER IDENTIFIED ABOVE.**

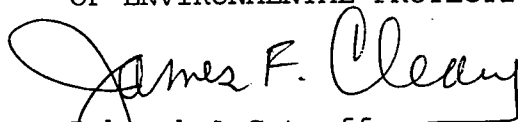
By: 

Date: 7-24-02

FOR DEPARTMENT USE ONLY

DONE AND ENTERED this 26th day of July, 2002.

STATE OF FLORIDA DEPARTMENT
OF ENVIRONMENTAL PROTECTION



Deborah A. Getzoff
Director of District Management
Southwest District

FILING AND ACKNOWLEDGMENT

FILED, on this date, pursuant to
§120.52, Florida Statutes,
With the designated Department
Clerk, receipt of which is hereby
Acknowledged.

Anna Black
Clerk

7-26-2002
Date

NOTICE OF RIGHTS

Persons who are not parties to this Consent Order but whose substantial interests are affected by this Consent Order have a right, pursuant to Sections 120.569 and 120.57, Florida Statutes, to petition for an administrative hearing on it. The Petition must contain the information set forth below and must be filed (received) at the Department's Office of General Counsel, 3900 Commonwealth Boulevard, MS-35, Tallahassee, Florida 32399-3000, within 21 days of receipt of this notice. A copy of the Petition must also be mailed at the time of filing to the District Office named above at the address indicated. Failure to file a petition within the 21 days constitutes a waiver of any right such person has to an administrative hearing pursuant to Sections 120.569 and 120.57, Florida Statutes.

The petition shall contain the following information:

(a) The name, address, and telephone number of each petitioner; the Department's Consent Order identification number and the county in which the subject matter or activity is located; (b) A statement of how and when each petitioner received notice of the Consent Order; (c) A statement of how each petitioner's substantial interests are affected by the Consent Order; (d) A statement of the material facts disputed by petitioner, if any; (e) A statement of facts which petitioner contends warrant reversal or modification of the Consent Order; (f) A statement of which rules or statutes petitioner contends require reversal or modification of the Consent Order; (g) A statement of the relief sought by petitioner, stating precisely the action petitioner wants the Department to take with respect to the Consent Order.

If a petition is filed, the administrative hearing process is designed to formulate agency action. Accordingly, the Department's final action may be different from the position taken by it in this Notice. Persons whose substantial interests will be affected by any decision of the Department with regard to the subject Consent Order have the right to petition to become a party to the proceeding. The petition must conform to the requirements specified above and be filed (received) within 21 days of receipt of this notice in the Office of General Counsel at the above address of the Department. Failure to petition within the allowed time frame constitutes a waiver of any right such person has to request a hearing under Sections 120.569 and 120.57, Florida Statutes, and to participate as a party to this proceeding. Any subsequent intervention will only be at the approval of the presiding officer upon motion filed pursuant to Rule 28-106.205, Florida Administrative Code.

Mediation under Section 120.573, Florida Statutes, is not available in this proceeding.



Jeb Bush
Governor

Department of Environmental Protection

Southwest District
3804 Coconut Palm Drive
Tampa, Florida 33619

David B. Struhs
Secretary

November 5, 2001

Mr. Tim Hagan
HOWCO Environmental Services
3701 Central Avenue
St. Petersburg, FL 33713

RE: HOWCO Environmental Services
EPA ID# FLD 152 764 767
Warning Letter #251080
Pinellas County

Dear Mr. Hagan:

The purpose of this letter is to advise you of possible violations of law for which you may be responsible, and to seek your cooperation in resolving the matter. A hazardous waste program field inspection conducted on August 13, 2001, indicates that violations of Florida Statutes and Rules may exist at the above referenced facility. Department of Environmental Protection personnel made observations described in the attached inspection report. Section 10 of the report lists a summary of alleged violations of Department Rules.

Section 403.727, Florida Statutes (F.S.) provides that it is a violation to fail to comply with rules adopted by the Department. The activities observed during the Department's field inspection and any other activities at your facility that may be contributing to violations of Florida Statutes or Department Rules should cease.

You are requested to contact Jim Dregne at (813)744-6100, extension 410, within fifteen (15) days of receipt of this Warning Letter to arrange a meeting to discuss this matter. The Department is interested in reviewing any facts you may have that will assist in determining whether any violations have occurred. You may bring anyone with you to the meeting that you feel could help resolve this matter.

Please be advised that this Warning Letter is part of an agency investigation, preliminary to agency action in accordance with Section 120.57(4), F.S. If after further investigation the Department's preliminary findings are verified, this matter may be resolved through the entry of a Consent Order which will include a compliance schedule, an appropriate penalty, and reimbursement of the Department's costs and expenses. In accordance with the United States Environmental Protection Agency's (EPA) RCRA Civil Penalty Policy of 1990, the penalties which would be assessed in this case are \$22,450.00. Costs and expenses in this case will be a minimum of \$100. If this matter cannot be resolved within 90 days, under

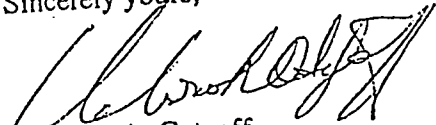
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11/16/01

the Department's agreement with the EPA, a formal administrative complaint or "Notice of Violation" (NOV) must be issued against you within 150 days of the date of the attached inspection report. We look forward to your cooperation in completing the investigation and resolution of this matter.

Sincerely yours,

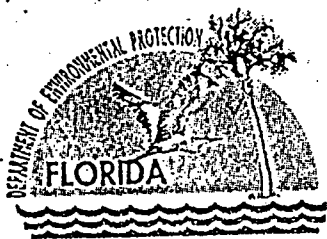


Deborah A. Getzoff
Director of District Management
Southwest District

DG/jmd

Enclosure

cc: Steve Ray, HWR Section
Angela Dempsey, OGC
Robert Butera, Solid Waste Section
Compliance File



Jeb Bush
Governor

Department of Environmental Protection

Southwest District
3804 Coconut Palm Drive
Tampa, Florida 33619

David B. Struhs
Secretary

HAZARDOUS WASTE INSPECTION REPORT

1. INSPECTION TYPE: ☒ Routine ☐ Complaint ☐ Follow-Up ☒ Permitting ☐ Pre-Arranged
FACILITY NAME: HOWCO Environmental Services DEP/EPA ID #: FLD 152 764 767
STREET ADDRESS: 843 43rd Street South; St. Petersburg, FL 33711
MAILING ADDRESS: 3701 Central Avenue; St. Petersburg, FL 33713
COUNTY: Pinellas PHONE: (727) 327-8467 DATE: 08/13/01 TIME: 9:15 am

NOTIFIED AS:

☐ N/A

- ☐ non-handler
☐ CESQG (<100 Kg per month)
☐ SQG (100 Kg - 1000 Kg per month)
☐ LQG (>1000 Kg per month)
☐ transporter
☐ transfer facility
☐ interim status TSDF
☐ permitted TSDF
☐ unit types:
☐ exempt treatment facility
☒ used oil: Processing Facility, Transporter
☒ used oil filter: Processor, Transporter

CURRENT STATUS:

- ☐ non-handler
☐ CESQG (<100 Kg per month)
☐ SQG (100 Kg - 1000 Kg per month)
☐ LQG (>1000 Kg per month)
☐ transporter
☐ transfer facility
☐ interim status TSDF
☐ permitted TSDF
☐ unit types:
☐ exempt treatment facility
☒ used oil: Processing Facility, Transporter
☒ used oil filter: Processor, Transporter

2. APPLICABLE REGULATIONS:

- ☐ 40 CFR 261.5 ☒ 40 CFR 262
☐ 40 CFR 265 ☐ 40 CFR 266
☒ 40 CFR 279 ☒ 62-710, FAC

- ☐ 40 CFR 263
☒ 40 CFR 268
☐ 62-737, FAC

- ☐ 40 CFR 264
☐ 40 CFR 273
☒ 62-740, FAC

3. RESPONSIBLE OFFICIAL:

Tim Hagan, President

4. INSPECTION PARTICIPANTS:

Al Gephart - FDEP
Jim Dregne - FDEP
Stanley Tam - FDEP
Steve Morgan - FDEP

Sara Smithee - FDEP
Richard Dillen - HOWCO
David Roehm - HOWCO
Tim Hagan - HOWCO

5. LATITUDE/LONGITUDE: 27°54'00"/ 82°38'11"

6. SIC CODE: 2999

7. TYPE OF OWNERSHIP: PRIVATE FEDERAL STATE COUNTY MUNICIPAL

8. PERMIT #: 92465-HO06-001 ISSUE DATE: 08/03/2000 EXP. DATE: 08/03/2005

"More Protection, Less Process"

9. PROCESS DESCRIPTION:

HOWCO Environmental Services is a used oil and material processing facility that stores, processes and markets used oil. HOWCO has been at this location since 1972 and currently employs approximately forty people; thirty of which work at the processing facility. The 3.2-acre site contains oil processing facility, an industrial wastewater pretreatment facility, storage tanks, vehicle maintenance garage and an on-site analytical laboratory. Administrative personnel and facility operating records are located and maintained at the Central Avenue office.

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North of the used oil filter crusher there was a roll-off box of crushed drums (scrap metal). Facility personnel are not completely emptying the drums. There was a substantial amount of oil in the roll-off box, some of which was leaking onto the ground. This is a violation of 40 CFR 279.54(g).

West of the used oil filter crusher was one (1) 30-gallon plastic container approximately 2/3 full with an open bung. The contents of the container appeared to be used oil and water. Following the inspection it was determined that the drum contained product diesel fuel used to power diesel equipment at the facility. The drum was labeled following the inspection.

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Wastewater, including petroleum contact water (PCW), industrial wastewater, rainwater collected in secondary containment areas and water from the re-refining of used oil is accumulated and stored in aboveground storage tanks #151-155, #160-166, #170, #180, #191 and #192. The wastewater is treated in the pre-treatment system prior to discharging to the City of St. Petersburg POTW. Any oil recovered from the tanks by gravity separation is pumped back to the used oil tank farm for re-refining. East of the wastewater pretreatment plant there was an area in which powdered lime had spilled from a damaged 50-pound bag onto the asphalt. The lime was cleaned up following the inspection.

Solid waste managed at the facility includes oily solid waste generated by HOWCO and its clients. Solid wastes generated by HOWCO includes solids from the vibrascreen, tanker trucks, cone-bottom tank, oily solid batch treatment tank and storage tanks at the facility. The oily solids may be placed in drums, roll-off boxes, decontamination boxes or other containers for storage. The wastes are managed as non-hazardous waste. The waste solids are sampled and analyzed once per year to demonstrate that the waste is non-hazardous. For incoming solid wastes, each client is to provide the necessary non-hazardous waste determination. A review of the sampling records indicated that the solid wastes were non-hazardous. The solid wastes are bulked and sent to an approved thermal facility or a licensed landfill for disposal. The facility does not have a tracking mechanism in place to track the incoming solid waste to the corresponding outbound shipments. At the time of the inspection, there were three (3) roll-off boxes of solid waste in the Solids Storage and Sludge Separation Areas. The roll-off boxes were covered and properly labeled, "Processed Solid Waste". Also noted was that the discharge pipe from Tank #111 extends outside the secondary containment. Per Specific Condition IV.7(e), the facility is to ensure that Tank #111 discharges into a suitable container, and does not discharge onto the ground or asphalt pavement. It is recommended that the facility install a flexible pipe onto the discharge that would extend back into the area of secondary containment when there is no container under the discharge pipe.

Receipts for pick-up and delivery of used oil products are maintained at the Central Avenue office. Incoming and outgoing manifests for used oil, used oil filters, crushed oil filters, petroleum contact water and antifreeze are kept by HOWCO for at least three years. A random selection of customer files were inspected, all of which were found to be in compliance.

HOWCO maintains manifests/records for each solid waste shipment accepted at the facility for processing/disposal at the Central Avenue office. HOWCO also maintains copies of analytical results submitted to demonstrate that a waste is non-hazardous. However, the shipment manifests and the submitted analytical results and annual generator hazardous waste determinations are kept in separate files, with no tracking system to link the analytical results or generator determinations to a particular manifested shipment. Therefore, HOWCO is unable to verify that a hazardous waste determination has

been made on each shipment of solid waste accepted at the facility for processing/disposal. This is a violation of Specific Condition IV.4.f. in the facility's operating permit and F.A.C. Rules 62-701.700(3)(a) & (b). (effective 4/23/97)

HOWCO maintains records of hazardous waste determination from each generator for solid waste streams received at the facility. HOWCO is required to have the generators re-affirm at least annually, that the processes have not changed and record this update in its records for that generator. No annual updates were noted in the generator files reviewed during this inspection, despite the fact that the original determinations were almost a year old. The Department will expect to find records of timely annual generator updates in the generators' files during its next facility inspection.

HOWCO failed to submit its initial proof of financial assurance, which is required to be submitted within 60 days of the date of issuance of the facility's operating permit (permit issued 8/3/00). This is a violation of Specific Condition IV.12.b. in the facility's operating permit and F.A.C. Rule 62-700(4) (effective 4/23/97). HOWCO also failed to submit its annual closure cost estimate update by the anniversary date of permit issuance. This is a violation of Specific Condition IV.12.a. in the facility's operating permit and F.A.C. Rule 62-700(4) (effective 4/23/97).

HOWCO failed to submit its annual used oil activities registration by March 1, 2001. This is a violation of 62-710.500(2), F.A.C.

Fire extinguishers at the facility were serviced in June 2001. The fire and emergency equipment are inspected monthly and are tested annually. Located east of the truck wash rack is the facility's spill kit consisting of absorbents, blankets and booms. Inspection records were reviewed and found to be complete.

Evacuation routes were posted at various locations and the emergency phone numbers were posted next to the phones.

The tanks and related piping are inspected monthly. The monthly inspection logs from October 2000 through July 2001 were found to be complete. However, the facility is not documenting what and when corrective actions are taken. It is recommended that the facility note on the inspection sheets when the listed inspection deficiencies are corrected.

HOWCO employees receive training as outlined in the company's "Used Oil Training Program". The company's employees are provided initial and annual refresher training. The last annual refresher training was conducted on January 26, 2001. Training records were reviewed and found to be complete. However, the training certificates were not signed by the instructor. It is recommended that the facility obtain the instructor's signature on future training certificates.

10. SUMMARY OF ALLEGED VIOLATIONS:

40 CFR 279.54(g)

Failure to respond to releases of used oil into the environment.

62-710.500(2), F.A.C.

Failure to submit the facility annual used oil registration by March 1. (Submitted on 7-18-01).

Specific Condition III.8

Failure to remove spilled or leaked waste within secondary containment areas. (*Repeat Violation*).

Specific Condition III.8.c.2

Failure to sample processed oil at a frequency of once every two weeks prior to shipping off-site.

Specific Condition IV.4.f.
and F.A.C. Rules 62-700(3)a. & b.

Failure to demonstrate a hazardous waste determination had been made for all solid waste received at the facility.

Specific Condition IV.12.b.
and F.A.C. Rule 62-700(4)

Failure to submit initial proof of financial assurance within 60 days of permit issuance.

Specific Condition IV.12.a.
and F.A.C. Rule 62-700(4)

Failure to submit annual closure cost estimates by the anniversary date of permit issuance.

11. RECOMMENDED CORRECTIVE ACTIONS:

40 CFR 279.54(g)

Upon discovery the facility shall ensure that all leaks and spills of used oil into the environment are contained and managed according to applicable rules and regulations.

Specific Condition III.8

Effective immediately and henceforth, the facility shall remove spilled or leaked waste within secondary containment areas as described in Section 9.6 of the facility's permit application.

Specific Condition III.8.c.2

Effective immediately and henceforth, at a minimum the facility shall sample its off-site shipments of processed oil once every two weeks.

Specific Condition IV.4.f.

Within 90 days of receipt of this report, the facility must develop a tracking system to link each waste shipments manifest with its corresponding generator or analytical hazardous waste determination.

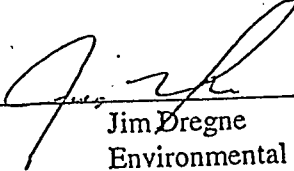
Specific Condition IV.12.b.

Immediately submit initial proof of financial assurance in the amount of \$58,760. Upon approval of annual closure cost estimates due August 3, 2001, provide proof of financial assurance in the amount of the approved annual cost estimate.

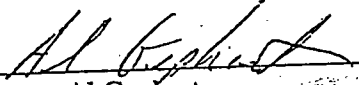
Specific Condition IV.12.a.

Within 30 days of receipt of this report, the facility must submit the annual closure cost estimate that was due August 3, 2001.

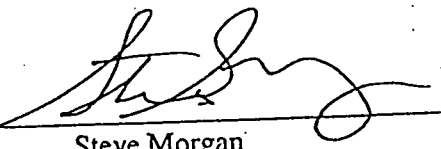
Report Prepared By:


Jim Dregne
Environmental Specialist III

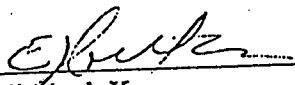
Report Reviewed By:


Al Gephart
Engineer IV

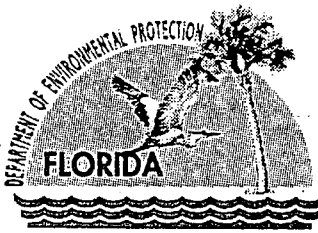
Report Reviewed By:


Steve Morgan
Environmental Specialist III

Report Approved By:


Elizabeth Knauss
Environmental Manager

Date: 10/30/01



Jeb Bush
Governor

Department of Environmental Protection

Southwest District
3804 Coconut Palm Drive
Tampa, Florida 33619

David B. Struhs
Secretary

November 5, 2001

Mr. Tim Hagan
HOWCO Environmental Services
3701 Central Avenue
St. Petersburg, FL 33713

RE: HOWCO Environmental Services
EPA ID# FLD 152 764 767
Warning Letter #251080
Pinellas County

Dear Mr. Hagan:

The purpose of this letter is to advise you of possible violations of law for which you may be responsible, and to seek your cooperation in resolving the matter. A hazardous waste program field inspection conducted on August 13, 2001, indicates that violations of Florida Statutes and Rules may exist at the above referenced facility. Department of Environmental Protection personnel made observations described in the attached inspection report. Section 10 of the report lists a summary of alleged violations of Department Rules.

Section 403.727, Florida Statutes (F.S.) provides that it is a violation to fail to comply with rules adopted by the Department. The activities observed during the Department's field inspection and any other activities at your facility that may be contributing to violations of Florida Statutes or Department Rules should cease.

You are requested to contact Jim Dregne at (813)744-6100, extension 410, within fifteen (15) days of receipt of this Warning Letter to arrange a meeting to discuss this matter. The Department is interested in reviewing any facts you may have that will assist in determining whether any violations have occurred. You may bring anyone with you to the meeting that you feel could help resolve this matter.

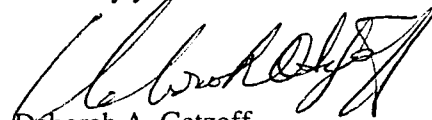
Please be advised that this Warning Letter is part of an agency investigation, preliminary to agency action in accordance with Section 120.57(4), F.S. If after further investigation the Department's preliminary findings are verified, this matter may be resolved through the entry of a Consent Order which will include a compliance schedule, an appropriate penalty, and reimbursement of the Department's costs and expenses. In accordance with the United States Environmental Protection Agency's (EPA) RCRA Civil Penalty Policy of 1990, the penalties which would be assessed in this case are \$22,450.00. Costs and expenses in this case will be a minimum of \$100. If this matter cannot be resolved within 90 days, under

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the Department's agreement with the EPA, a formal administrative complaint or "Notice of Violation" (NOV) must be issued against you within 150 days of the date of the attached inspection report. We look forward to your cooperation in completing the investigation and resolution of this matter.

Sincerely yours,

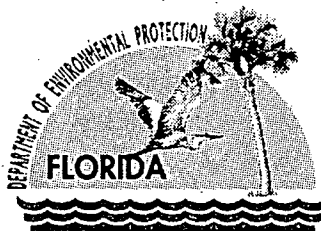


Deborah A. Getzoff
Director of District Management
Southwest District

DG/jmd

Enclosure

cc: Steve Ray, HWR Section
Angela Dempsey, OGC
Robert Butera, Solid Waste Section
Compliance File



Jeb Bush
Governor

Department of Environmental Protection

Southwest District
3804 Coconut Palm Drive
Tampa, Florida 33619

David B. Struhs
Secretary

HAZARDOUS WASTE INSPECTION REPORT

1. INSPECTION TYPE: ☒ Routine ☐ Complaint ☐ Follow-Up ☒ Permitting ☐ Pre-Arranged

FACILITY NAME: HOWCO Environmental Services DEP/EPA ID #: FLD 152 764 767

STREET ADDRESS: 843 43rd Street South; St. Petersburg, FL 33711

MAILING ADDRESS: 3701 Central Avenue; St. Petersburg, FL 33713

COUNTY: Pinellas PHONE: (727) 327-8467 DATE: 08/13/01 TIME: 9:15 am

NOTIFIED AS: ☐ N/A

- ☐ non-handler
- ☐ CESQG (<100 Kg per month)
- ☐ SQG (100 Kg - 1000 Kg per month)
- ☐ LQG (>1000 Kg per month)
- ☐ transporter
- ☐ transfer facility
- ☐ interim status TSDF
- ☐ permitted TSDF
- ☐ unit types:
- ☐ exempt treatment facility
- ☒ used oil: Processing Facility, Transporter
- ☒ used oil filter: Processor, Transporter

CURRENT STATUS:

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2. APPLICABLE REGULATIONS:

- | | | | |
|--|---|--|---|
| <input type="checkbox"/> 40 CFR 261.5 | <input checked="" type="checkbox"/> 40 CFR 262 | <input type="checkbox"/> 40 CFR 263 | <input type="checkbox"/> 40 CFR 264 |
| <input type="checkbox"/> 40 CFR 265 | <input type="checkbox"/> 40 CFR 266 | <input checked="" type="checkbox"/> 40 CFR 268 | <input type="checkbox"/> 40 CFR 273 |
| <input checked="" type="checkbox"/> 40 CFR 279 | <input checked="" type="checkbox"/> 62-710, FAC | <input type="checkbox"/> 62-737, FAC | <input checked="" type="checkbox"/> 62-740, FAC |

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West of the used oil filter crusher was one (1) 30-gallon plastic container approximately 2/3 full with an open bung. The contents of the container appeared to be used oil and water. Following the inspection it was determined that the drum contained product diesel fuel used to power diesel equipment at the facility. The drum was labeled following the inspection.

HOWCO routinely collects waste antifreeze from its customers. The non-hazardous waste determination for the spent antifreeze is maintained on-site in the form of a record of certification from each generator clearly stating the basis for determining the waste antifreeze to be non-hazardous. HOWCO may treat the non-hazardous waste antifreeze in its industrial wastewater pretreatment plant or ship it to another treatment facility for disposal or recycling. Any used oil present in the antifreeze will be removed by oil/water separation. A review of HOWCO's records showed that there were waste determination documents from its clients on file.

Wastewater, including petroleum contact water (PCW), industrial wastewater, rainwater collected in secondary containment areas and water from the re-refining of used oil is accumulated and stored in aboveground storage tanks #151-155, #160-166, #170, #180, #191 and #192. The wastewater is treated in the pre-treatment system prior to discharging to the City of St. Petersburg POTW. Any oil recovered from the tanks by gravity separation is pumped back to the used oil tank farm for re-refining. East of the wastewater pretreatment plant there was an area in which powdered lime had spilled from a damaged 50-pound bag onto the asphalt. The lime was cleaned up following the inspection.

Solid waste managed at the facility includes oily solid waste generated by HOWCO and its clients. Solid wastes generated by HOWCO includes solids from the vibrascreen, tanker trucks, cone-bottom tank, oily solid batch treatment tank and storage tanks at the facility. The oily solids may be placed in drums, roll-off boxes, decontamination boxes or other containers for storage. The wastes are managed as non-hazardous waste. The waste solids are sampled and analyzed once per year to demonstrate that the waste is non-hazardous. For incoming solid wastes, each client is to provide the necessary non-hazardous waste determination. A review of the sampling records indicated that the solid wastes were non-hazardous. The solid wastes are bulked and sent to an approved thermal facility or a licensed landfill for disposal. The facility does not have a tracking mechanism in place to track the incoming solid waste to the corresponding outbound shipments. At the time of the inspection, there were three (3) roll-off boxes of solid waste in the Solids Storage and Sludge Separation Areas. The roll-off boxes were covered and properly labeled, "Processed Solid Waste". Also noted was that the discharge pipe from Tank #111 extends outside the secondary containment. Per Specific Condition IV.7(e), the facility is to ensure that Tank #111 discharges into a suitable container, and does not discharge onto the ground or asphalt pavement. It is recommended that the facility install a flexible pipe onto the discharge that would extend back into the area of secondary containment when there is no container under the discharge pipe.

Receipts for pick-up and delivery of used oil products are maintained at the Central Avenue office. Incoming and outgoing manifests for used oil, used oil filters, crushed oil filters, petroleum contact water and antifreeze are kept by HOWCO for at least three years. A random selection of customer files were inspected, all of which were found to be in compliance.

HOWCO maintains manifests/records for each solid waste shipment accepted at the facility for processing/disposal at the Central Avenue office. HOWCO also maintains copies of analytical results submitted to demonstrate that a waste is non-hazardous. However, the shipment manifests and the submitted analytical results and annual generator hazardous waste determinations are kept in separate files, with no tracking system to link the analytical results or generator determinations to a particular manifested shipment. Therefore, HOWCO is unable to verify that a hazardous waste determination has

been made on each shipment of solid waste accepted at the facility for processing/disposal. **This is a violation of Specific Condition IV.4.f. in the facility's operating permit and F.A.C. Rules 62-701.700(3)(a)&(b).(effective 4/23/97)**

HOWCO maintains records of hazardous waste determination from each generator for solid waste streams received at the facility. HOWCO is required to have the generators re-affirm at least annually, that the processes have not changed and record this update in its records for that generator. No annual updates were noted in the generator files reviewed during this inspection, despite the fact that the original determinations were almost a year old. The Department will expect to find records of timely annual generator updates in the generators' files during its next facility inspection.

HOWCO failed to submit its initial proof of financial assurance, which is required to be submitted within 60 days of the date of issuance of the facility's operating permit (permit issued 8/3/00). **This is a violation of Specific Condition IV.12.b. in the facility's operating permit and F.A.C. Rule 62-700(4) (effective 4/23/97).** HOWCO also failed to submit its annual closure cost estimate update by the anniversary date of permit issuance. **This is a violation of Specific Condition IV.12.a. in the facility's operating permit and F.A.C. Rule 62-700(4) (effective 4/23/97).**

HOWCO failed to submit its annual used oil activities registration by March 1, 2001. **This is a violation of 62-710.500(2), F.A.C.**

Fire extinguishers at the facility were serviced in June 2001. The fire and emergency equipment are inspected monthly and are tested annually. Located east of the truck wash rack is the facility's spill kit consisting of absorbents, blankets and booms. Inspection records were reviewed and found to be complete.

Evacuation routes were posted at various locations and the emergency phone numbers were posted next to the phones.

The tanks and related piping are inspected monthly. The monthly inspection logs from October 2000 through July 2001 were found to be complete. However, the facility is not documenting what and when corrective actions are taken. It is recommended that the facility note on the inspection sheets when the listed inspection deficiencies are corrected.

HOWCO employees receive training as outlined in the company's "Used Oil Training Program". The company's employees are provided initial and annual refresher training. The last annual refresher training was conducted on January 26, 2001. Training records were reviewed and found to be complete. However, the training certificates were not signed by the instructor. It is recommended that the facility obtain the instructor's signature on future training certificates.

10. SUMMARY OF ALLEGED VIOLATIONS:

40 CFR 279.54(g)

Failure to respond to releases of used oil into the environment.

62-710.500(2), F.A.C.

Failure to submit the facility annual used oil registration by March 1. *(Submitted on 7-18-01).*

Specific Condition III.8

Failure to remove spilled or leaked waste within secondary containment areas. (*Repeat Violation*).

Specific Condition III.8.c.2

Failure to sample processed oil at a frequency of once every two weeks prior to shipping off-site.

Specific Condition IV.4.f.
and F.A.C. Rules 62-700(3)a. & b.

Failure to demonstrate a hazardous waste determination had been made for all solid waste received at the facility.

Specific Condition IV.12.b.
and F.A.C. Rule 62-700(4)

Failure to submit initial proof of financial assurance within 60 days of permit issuance.

Specific Condition IV.12.a.
and F.A.C. Rule 62-700(4)

Failure to submit annual closure cost estimates by the anniversary date of permit issuance.

11. RECOMMENDED CORRECTIVE ACTIONS:

40 CFR 279.54(g)

Upon discovery the facility shall ensure that all leaks and spills of used oil into the environment are contained and managed according to applicable rules and regulations.

Specific Condition III.8

Effective immediately and henceforth, the facility shall remove spilled or leaked waste within secondary containment areas as described in Section 9.6 of the facility's permit application.

Specific Condition III.8.c.2

Effective immediately and henceforth, at a minimum the facility shall sample its off-site shipments of processed oil once every two weeks.

Specific Condition IV.4.f.

Within 90 days of receipt of this report, the facility must develop a tracking system to link each waste shipments manifest with its corresponding generator or analytical hazardous waste determination.

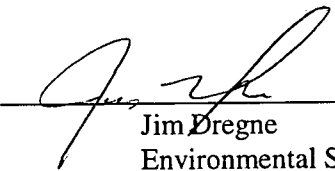
Specific Condition IV.12.b.

Immediately submit initial proof of financial assurance in the amount of \$58,760. Upon approval of annual closure cost estimates due August 3, 2001, provide proof of financial assurance in the amount of the approved annual cost estimate.

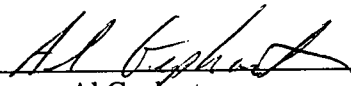
Specific Condition IV.12.a.

Within 30 days of receipt of this report, the facility must submit the annual closure cost estimate that was due August 3, 2001.

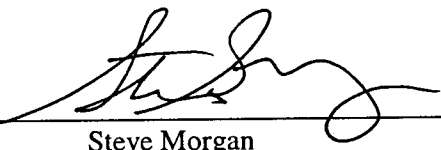
Report Prepared By:


Jim Dregne
Environmental Specialist III

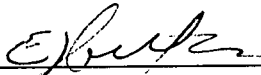
Report Reviewed By:


Al Gephart
Engineer IV

Report Reviewed By:


Steve Morgan
Environmental Specialist III

Report Approved By:


Elizabeth Knauss
Environmental Manager

Date: 10/30/01

PENALTY COMPUTATION WORKSHEET

Violator's Name: HOWCO Environmental Services

Identify Violator's Facility: 843 43rd Street South, St. Petersburg, FL 33711

Name of Department Staff Responsible for the Penalty Computations: Jim Dregne

ComHaz Case #: 251080

Date: September 21, 2001

	Violation Type	Manual Guide	Potential for Harm	Extent of Deviation	Matrix Range	Multi Day	Other Adjustments	Total
1	279.54(g) oil release	27.1	Minor	Major	\$1,999 -- \$600			\$900
2	62-710.500(2) registration	21.4	Minor	Moderate	\$599 -- \$200			\$400
3	Spec. Cond. III.8 second. contain.	28.6	Major	Major	\$10,000 \$8,000			\$9,000
4	Spec. Cond. III.8.C.2 sampling	21.1	Minor	Minor	\$199-- \$100			\$150
5	Spec. Cond. IV.4.F waste determination.		Moderate	Moderate	\$3,100 -- \$2,000			\$2,600
6	Spec. Cond. IV.12.B financial assurance		Major	Major	\$10,000 \$8,000			\$9,000
7	Spec. Cond. IV.12.A closure cost est.		Minor	Moderate	\$599 -- \$200			\$400
Administrative Cost								\$100

TOTAL COST

\$22,550.00

Inspectors: Bregne / Gephart / Tam /
Honey / Morgan / Smithée

Date: August 14, 2001

INSPECTION CHECKLIST

HOWCO Environmental Services
843 43rd Street South
St. Petersburg, FL 33711
FLD 152 764 767

Permit No. 92465-HO06-001
Issued: 08/03/00
Expires: 08/03/05
Site ID No. 33721

Last Inspection 9/19/00

Used Oil and Material Processing Facility

47 Aboveground Storage Tanks (See Tables 3-1, 3-2 and 3-3 for descriptions of contents).

GC General Conditions

- GC.2 Have there been any changes in processes or operations ? Y ✓N
- GC.12 A copy of the operating permit is maintained at the facility. ✓Y N
- GC.14 Operating records contain the required information: ✓Y N
- Date, Place and Time of sampling or analyses;
 - Person performing the sampling or analyses;
 - Analytical techniques or methods used;
 - Results of the analyses.

SC Specific Conditions

Part I. General

- I.11 The facility has submitted its annual registration by March 1. *Submitted on 7-18-01* Y ✓N
- I.12 Were any shipments of used oil refused due to suspected mixing with hazardous waste ? (Any oil analyses pass or fail must be kept for 3 yrs.) Y ✓N

Part II. Used Oil Processing

- II.3 Only permitted waste streams are processed at the facility. ✓Y N
- Automotive crankcase oil, transmission and differential oil;
 - Oil/water emulsion from ships, barges and other sources;
 - Automotive oils recovered from oil/water separators;
 - Virgin oils contaminated with water;
 - Virgin oils recovered from tank cleaning and tank removals;
 - Used industrial oil.

HOWCO Environmental Services
Compliance Evaluation Inspection Checklist

II.4 Generators supply initial TCLP analysis (or generator knowledge statement) of waste antifreeze. (Check facility files for certifications.) ☒ Y ☐ N

II.6 The following records are maintained at the facility or the Central Ave. office.

- Permit application; ☒ Y ☐ N
- Operating permit; ☒ Y ☐ N
- Manifests and Bill-of-Lading of all shipments; ☒ Y ☐ N
- Shipping papers ^{OR FACILITY DOCUMENTATION} include all of the required information as stated in 40 CFR 279.56 (Acceptance / Delivery); ☒ Y ☐ N
- Training records; *Records not signed by instructor* ☒ Y ☐ N
- Inspection records; ☒ Y ☐ N
- Closure Plan; ☒ Y ☐ N
- Results of Waste Analyses; ☒ Y ☐ N
- Annual used oil recovery reports; ☒ Y ☐ N
- Validated annual used oil registration form. *NOT submitted until 7-18-01* ☐ Y ☒ N

II.8 Processed oil is sampled prior to shipping off-site once every two weeks. ☐ Y ☒ N

sampled twice/month

Part III. Tanks

III.1 Used oil tanks and containers are labeled "Used Oil". ☒ Y ☐ N

III.2 Regulated tank systems are inspected monthly. ☒ Y ☐ N

III.3 Records are maintained for inspections and monthly release detection monitoring for process and storage tanks. ☒ Y ☐ N

III.5 Secondary containment areas are sealed and free of cracks. ** FACILITY NEEDS TO INSPECT closely* ☒ Y ☐ N *MARGINAL*

III.6 The areas of secondary containment provide containment for at least 110 % of the volume of the largest tank. ☒ Y ☐ N

III.8 Spilled or leaked waste is removed from containment areas within 3 days of the incident. *NOT APPARENT TO INSPECTORS* ☐ Y ☒ N

Accumulated precipitation is removed within 1 week after a rainfall event using manually controlled pumps. *NO precipitation observed* ☐ Y ☐ N

Part IV. Solid Waste Processing

IV.1 Non-hazardous materials that are accepted, processed, stored or otherwise managed are limited to - ☒ Y ☐ N

- Petroleum contaminated soil;
- Petroleum contaminated sorbent materials (pads, booms, rags, vermiculite);
- PPE;
- Debris from spill cleanup;
- Petroleum tank bottom sludges from tanks, pits and sumps;

HOWCO Environmental Services
Compliance Evaluation Inspection Checklist

- Petroleum contaminated water;
- Petroleum contact water;
- Petroleum contaminated sediments sludges and liquids from oil/water separators at car washes;
- Empty petroleum contaminated drums, pails, gas tanks and fuel filters;
- Non-liquid waste streams from on-site oil processing and wastewater pretreatment facilities.

	Household hazardous wastes or wastes from a CESQG are <u>NOT</u> managed as solid waste at the facility.	<input checked="" type="checkbox"/> Y <input type="checkbox"/> N
IV.3	Processing equipment is repaired within one week of becoming inoperable. <i>* None noted as being "down"</i>	<input type="checkbox"/> Y <input type="checkbox"/> N
	Operations DO NOT change the chemical characteristics of any of the solid materials.	<input checked="" type="checkbox"/> Y <input type="checkbox"/> N
IV.4	Each solid waste stream is sampled and analyzed at least annually.	<input checked="" type="checkbox"/> Y <input type="checkbox"/> N
	Records are available of annual WWTS sampling and analyses.	<input checked="" type="checkbox"/> Y <input type="checkbox"/> N
	Records are available of annual oil-extracted sludge (OES) sampling and analyses.	<input type="checkbox"/> Y <input type="checkbox"/> N
	Vibratory screen filter solids are containerized, properly sealed and labeled, "Screen Filter Residue".	<input checked="" type="checkbox"/> Y <input type="checkbox"/> N
	All tank bottom sludges and screen filter residues are transferred to Tanks 110 or 111 for further processing. (If not, the facility must have records of waste determinations on these streams.)	<input checked="" type="checkbox"/> Y <input type="checkbox"/> N
	The facility has notified the Department within 3 days prior to sampling any solid waste streams. <i>WILL BE NOTIFYING FOR UPCOMING SAMPLING EVENT.</i>	<input type="checkbox"/> Y <input checked="" type="checkbox"/> N
	The facility has records of hazardous waste determinations from each generator for all solid waste streams received.	<input checked="" type="checkbox"/> Y <input type="checkbox"/> N
	The determinations are updated annually. <i>UNKNOWN. NO ANNUAL UPDATES FOR 10, BUT MAY NOT HAVE BEEN DONE AT TIME OF INSPECTION</i>	<input checked="" type="checkbox"/> Y <input type="checkbox"/> N
IV.5	All outgoing materials for disposal are sampled and analyzed annually.	<input checked="" type="checkbox"/> Y <input type="checkbox"/> N
IV.6	Storage of solid waste is at or below 22,000 gallons. Where 15 yd ³ = 3,030 gallons 20 yd ³ = 4,040 gallons	<input checked="" type="checkbox"/> Y <input type="checkbox"/> N
	Processed solids are stored in covered, lined, roll-off containers or covered drums and stored on an impervious surface. <i>See p. 2 # III.5 - Facility needs to inspect closely</i>	<input type="checkbox"/> Y <input type="checkbox"/> N <i>MAYBE</i>
	All processed and unprocessed solid wastes are <u>stored</u> within the Solids Storage and Sludge Separation Areas.	<input checked="" type="checkbox"/> Y <input type="checkbox"/> N

HOWCO Environmental Services
Compliance Evaluation Inspection Checklist

IV.7

All materials are processed on impervious surfaces, tanks or containers.

☐ Y ☐ N *MARGINAL*

Containers of processed wastes are labeled "Processed Solids" or "Processed Solid Waste".

☒ Y ☐ N

There is no evidence of liquids or solids being discharged outside of the Solids Storage and Sludge Separation Areas.

☒ Y ☐ N

Solid wastes (liquids, sludges, solids, etc.) are only managed within containers, NOT on the ground, on the asphalt or on the concrete areas.

☒ Y ☐ N

The Solids Storage and Sludge Separation Areas are inspected monthly.

☒ Y ☐ N

IV.9

The facility maintains the following waste records:

☒ Y ☐ N

- The amount of waste received, stored, processed and disposed [Quantities of drums received (gallons), an estimate of the percentage of solids and liquids in each drum, the quantities of bulk liquids received (gallons), the quantities of bulk solids received (tons), and the quantities of liquids (gallons) and solids (tons) disposed and stored on site];
- A signed waste profile form and analytical data for each waste stream accepted at the facility or for virgin materials, a waste material profile sheet and MSDS;
- The pre-burn analysis for each shipment of contaminated soil received that will be transferred to a soil treatment facility;
- The pre-acceptance analyses or waste determinations;
- Copies of any analyses required by a disposal facility as a condition of acceptance and documentation of acceptance;
- Monthly Waste Inspection/Corrective Action logs;
- Copies of permits for facilities that receive the processed solids.

☐ Y ☒ N

☒ Y ☐ N

☒ Y ☐ N

☒ Y ☐ N

☒ Y ☐ N

☒ Y ☐ N

Monthly compilations are submitted quarterly of the following:

☒ Y ☐ N

- Material balance (quantities received versus quantities disposed or in storage);
- Name and location of disposal or treatment facility for all solid wastes removed from the facility.

☒ Y ☒ N

IV.10

All areas are cleaned to prevent nuisance conditions, hazardous conditions, odor or vector problems.

☒ Y ☐ N

IV.12

The facility is in compliance with Financial Assurance requirements.

- Closure costs are submitted annually prior to August 3;
- Annual submittal of proof of financial assurance.

☐ Y ☒ N

☐ Y ☒ N

Part V. Contingency Plan

V.2

Emergency and spill equipment is available at the facility.
Check the emergency equipment stored east of the truck wash rack and at the drum crusher.

☒ Y ☐ N

HOWCO Environmental Services
Compliance Evaluation Inspection Checklist

At a minimum the facility shall have:

- | | |
|-------------------------------|---------------------------|
| 5 bales of absorbent booms | 5 bales of absorbent pads |
| 10 bags of granular absorbent | 5 flashlights |
| 3 push brooms | 4 shovels |
| 2 55-gallon containers | 2 rakes |
| 5 tyvek suits | 5 gloves |
| 5 safety glasses | 5 rain gear |

☒ Y ☐ N

V.3,4 The emergency and safety equipment is available, tested and maintained.

☒ Y ☐ N

V.5 There is adequate aisle space in all storage areas for inspections.

☒ Y ☐ N

V.6 Primary evacuation routes are posted in appropriate locations throughout the facility.

☒ Y ☐ N

V.7 A copy of the Contingency Plan is maintained on-site.

☒ Y ☐ N

The following are still the Emergency Coordinators:

☒ Y ☐ N

David Roehm

Primary

Tim Hagan

Alternate

A list of emergency response phone numbers is posted by the phones.

☒ Y ☐ N

The Contingency Plan was last amended on (date) 7-21-99

Amendments to the CP are sent to appropriate agencies.

☒ N/A ☐ Y ☐ N

Part VI. Training

VI.1,2 The Company's "Used Oil Training Program" is given initially and annually thereafter.

☒ Y ☐ N

Personnel training is documented. *INSTRUCTOR DID NOT SIGN TRAINING CERTIFICATES*

☒ Y ☐ N

Part VII. Closure

VII.1 The facility maintains a copy of the Closure Plan.

☒ Y ☐ N

Used Oil Filter Processing (62-710.850, F.A.C.)

62-710.850(4) The facility has current registration certificates for -

- Used Oil Filter Transporter
- Used Oil Filter Processor

Annual Registration Submitted Late

☐ Y ☒ N
☐ Y ☒ N

62-710.850(5) The facility has records indicating the destination or end use of the processed used oil filters and the Name and Address of each destination or end user.

☒ Y ☐ N

The facility has submitted its annual report by March 1. *NO*

☐ Y ☒ N

Submitted 7-18-01

HOWCO Environmental Services
Compliance Evaluation Inspection Checklist

62-710.850(6) All used oil filters are stored in –

- Above ground containers on impermeable surfaces;
- Sealed containers that are in good condition;
- Containers labeled, "Used Oil Filters";

*Facility needs to repair
inspect and replace
as necessary*

☒ Y ☐ N

☒ Y ☐ N

☐ Y ☒ N

Upon detection of any leaking oil from a container the oil is contained,
cleaned-up and managed properly.

*Some drums
do not have labels*

☐ Y ☒ N

Petroleum Contact Water (62-740, F.A.C.)

62-740.300(2) The following records are maintained at the facility:

☒ Y ☐ N

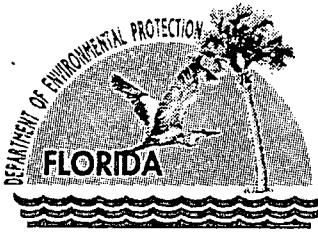
- Name and address of producer;
- Name and address of transporter;
- Date of receipt of the PCW shipment;
- Volume of PCW received;
- A copy of the shipping paper;
- Weekly container or tank inspections.

62-740.300(4) The facility has written assurance from the producer that the
PCW is non-hazardous.

☐ Y ☐ N

DOCUMENTS AND RECORDKEEPING

Permit Application.	Operating Permit.
Validated Annual Used Oil Registration [Form 62-701.900(13)].	Annual Used Oil Recovery Report.
Annual DEP Registration Placard For Storage Tanks.	Contingency Plan.
Training Logs.	Closure Plan.
Results of Annual Waste Analyses For All Solid Waste Streams <i>Disposed</i> .	Transporter Liability Insurance [\$100,000 minimum].
Results of Annual Waste Analyses For All Solid Waste Streams <i>Received</i> From Generators.	Monthly Inspection Logs Of The Solids Storage and Sludge Separation Areas.
Processed Oil Sampling Logs [Minimum Of One Sample Every Two Weeks].	Annual Analyses Of WWT and OES Sludges.
Tank Inspections and Monthly Release Detection Monitoring.	Generator Non-Haz Demonstration For Used Antifreeze.
Analysis Of Vibrascreen Filter Solids and Tank Bottom Sludges [Unless Processed In Tanks 110 or 111].	Records Of Refused Used Oil Shipments
Documentation Of Annual Closure Cost Estimate [Solid Waste Processing].	Documentation Of Annual Financial Assurance [Solid Waste Processing].
Records Of Quantities Of Waste Received, Stored, Processed and Disposed.	Quarterly Submittals Of Material Balance Of Quantities Of Solid Waste.
Records Of Disposal Or Treatment Facility For All Solid Wastes Removed [Name and Location].	Monthly Solid Waste Inspection / Corrective Actions Logs.
Copies Of Permits For Facilities Receiving Processed Wastes.	Manifests / Bill-Of-Lading.
Monthly Inspection Logs Of Safety and Emergency Equipment.	



Jeb Bush
Governor

Department of Environmental Protection

Southwest District
3804 Coconut Palm Drive
Tampa, Florida 33619

David B. Struhs
Secretary

October 26, 2001

Mr. Tim Hagan
HOWCO Environmental Services
3701 Central Avenue
St. Petersburg, FL 33713

RE: Settlement Agreement, OGC Case No. 01-1496C
HOWCO Environmental Services
FLD 152 764 767, Pinellas County

Dear Mr. Hagan:

Enclosed is a copy of the executed Settlement Agreement for the referenced case.

In order to close this case, you have agreed to pay in settlement the amount of \$4,000.00, along with \$100.00 to reimburse the Department costs, for a total of \$4,100.00. The payment shall be made in four (4) monthly installment payments. The first payment of \$1,100.00 is due on January 10, 2002. The initial payment shall be followed by three (3) equal monthly payments of \$1,000.00. Payments are due on the 10th of each month. Final payment is due no later than April 10, 2002.

Your continued cooperation is appreciated. If you have any question please call me at (813) 744-6100, extension 410.

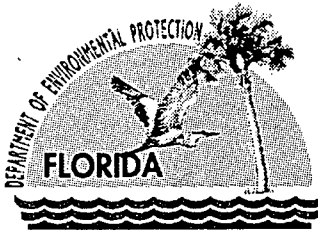
Sincerely,

James M. Dregne
Environmental Specialist III
Division of Waste Management

JMD/jd

Enclosure

cc: Kathy Carter, OGC
Steven Ray, HWR Section
Jeff Pallas, US EPA Region IV
Compliance File
Angela Dempsey, OGC



Jeb Bush
Governor

Department of Environmental Protection

Southwest District
3804 Coconut Palm Drive
Tampa, Florida 33619

October 9, 2001

David B. Struhs
Secretary

**CERTIFIED MAIL
RETURNED RECEIPT REQUESTED**

HOWCO Environmental Services
3701 Central Avenue
St. Petersburg, Florida 33713

Attention: Arthur T. (Tim) Hagan

Re: Proposed Settlement of HOWCO Environmental Services
FLD 152 764 767
OGC File No.: 01-1496C

Dear Mr. Hagan

The purpose of this letter is to complete the resolution of the matter previously identified by the Department in the Warning Letter dated March 21, 2001, a copy of which is attached. The corrective actions required to bring your facility into compliance have been performed. In order to resolve the matters identified in the attached Warning Letter, you are assessed civil penalties in the amount of \$4,000.00, along with \$100.00 to reimburse the Department costs, for a total of \$4,100.00. This payment must be made payable to The Department of Environmental Protection by certified check or money order and shall include the OGC File Number assigned above and the notation "Ecosystem Management and Restoration Trust Fund." Payment shall be sent to the Department of Environmental Protection, 3804 Coconut Palm Drive, Tampa, Florida, 33619-8318. The payment shall be made in four monthly installment payments. The first payment of \$1,100.00 shall be made within ninety (90) days of your signing this letter. The initial payment shall be followed by three (3) equal monthly payments of \$1000.00. Final payment is due no later than May 1, 2002. Failure to timely make any installment payment will allow the Department, at its discretion, to accelerate the balance which will become immediately due.

Your signing of this letter constitutes your acceptance of the Department's offer to resolve this matter on these terms. If you elect to sign this letter, please return it to the Department at the address indicated above. The Department will then countersign the letter and file it with the Clerk of the Department. When the signed letter is filed with the Clerk, the letter shall constitute final agency action of the Department, which shall be enforceable pursuant to Sections 120.69 and 403.121, Florida Statutes.

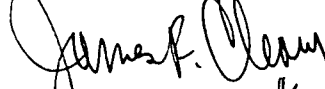
"More Protection, Less Process"

Printed on recycled paper.

RECEIVED
OCT 19 2001
Department of Environmental Protection
SOUTHWEST DISTRICT

If you do not sign and return this letter to the Department at the District address above by October 24, 2001, the Department will assume that you are not interested in settling this matter on the above described terms, and will proceed accordingly. None of your rights of substantial interests are determined by this letter unless you sign it and it is filed with the Department Clerk.

Sincerely yours,



Deborah A. Getzoff
Director of District Management
Southwest District

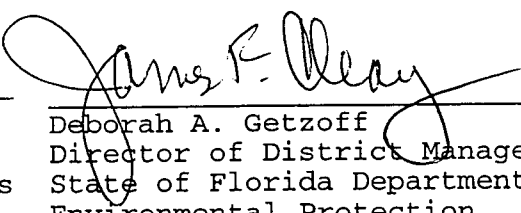
I ACCEPT THE TERMS OF THIS SETTLEMENT OFFER IDENTIFIED ABOVE.

For: HOWCO Environmental Services For the Department:

By:



Tim Hagan
President
HOWCO Environmental Services



Deborah A. Getzoff
Director of District Management
State of Florida Department of
Environmental Protection

ENTERED this 10 day of October, 2001 in Tampa, Florida.

DAG/jmd

Attachment

FILING AND ACKNOWLEDGMENT
FILED, on this date, pursuant to
§120.52(10), Florida Statutes, with the
designated Department Clerk, receipt of
which is hereby acknowledged.

Anna Black 10-26-01
Clerk Date

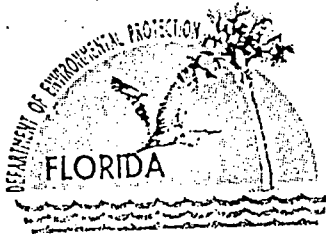
NOTICE OF RIGHTS

Persons who are not parties to this Consent Order but whose substantial interests are affected by this Consent Order have a right, pursuant to Sections 120.569 and 120.57, Florida Statutes, to petition for an administrative hearing on it. The Petition must contain the information set forth below and must be filed (received) at the Department's Office of General Counsel, 3900 Commonwealth Boulevard, MS-35, Tallahassee, Florida 32399-3000, within 21 days of receipt of this notice. A copy of the Petition must also be mailed at the time of filing to the District Office named above at the address indicated. Failure to file a petition within the 21 days constitutes a waiver of any right such person has to an administrative hearing pursuant to Sections 120.569 and 120.57, Florida Statutes.

The petition shall contain the following information: (a) The name, address, and telephone number of each petitioner; the Department's Consent Order identification number and the county in which the subject matter or activity is located; (b) A statement of how and when each petitioner received notice of the Consent Order; (c) A statement of how each petitioner's substantial interests are affected by the Consent Order; (d) A statement of the material facts disputed by petitioner, if any; (e) A statement of facts which petitioner contends warrant reversal or modification of the Consent Order; (f) A statement of which rules or statutes petitioner contends require reversal or modification of the Consent Order; (g) A statement of the relief sought by petitioner, stating precisely the action petitioner want the Department to take with respect to the Consent Order.

If a petition is filed, the administrative hearing process is designed to formulate agency action. Accordingly, the Department's final action may be different from the position taken by it in this Notice. Persons whose substantial interests will be affected by any decision of the Department with regard to the subject Consent Order have the right to petition to become a party to the preceding. The petition must conform to the requirements specified above and be filed (received) within 21 days of receipt of this notice in the Office of General Counsel at the above address of the Department. Failure to petition within the allowed time frame constitutes a waiver of any right such person has to request a hearing under Sections 120.569 and 120.57, Florida Statutes, and to participate as a party to this proceeding. Any subsequent intervention will only be at the approval of the presiding officer upon motion filed pursuant to Rule 28-106.205, Florida Administrative Code.

Mediation under Section 120.573, Florida Statutes, is not available in the proceeding.



Jeb Bush
Governor

Department of Environmental Protection

Southwest District
3804 Coconut Palm Drive
Tampa, Florida 33619

David B. Struhs
Secretary

March 21, 2001

Mr. Tim Hagan
HOWCO Environmental Services
3701 Central Avenue
St. Petersburg, FL 33713

RE: HOWCO Environmental Services
EPA ID# FLD 152 764 767
Warning Letter #241880
Pinellas County

RECEIVED
OCT 19 2001
Department of Environmental Protection
SOUTHWEST DISTRICT
BY _____

Dear Mr. Hagan:

The purpose of this letter is to advise you of possible violations of law for which you may be responsible, and to seek your cooperation in resolving the matter. A hazardous waste program field inspection conducted on September 19, 2000, indicates that violations of Florida Statutes and Rules may exist at the above referenced facility. Department of Environmental Protection personnel made observations described in the attached inspection report. Section 10 of the report lists a summary of alleged violations of Department Rules.

Section 403.727, Florida Statutes (F.S.) provides that it is a violation to fail to comply with rules adopted by the Department. The activities observed during the Department's field inspection and any other activities at your facility that may be contributing to violations of Florida Statutes or Department Rules should cease.

You are requested to contact Jim Dregne at (813)744-6100, extension 410, within fifteen (15) days of receipt of this Warning Letter to arrange a meeting to discuss this matter. The Department is interested in reviewing any facts you may have that will assist in determining whether any violations have occurred. You may bring anyone with you to the meeting that you feel could help resolve this matter.

Please be advised that this Warning Letter is part of an agency investigation, preliminary to agency action in accordance with Section 120.57(4), F.S. If after further investigation the Department's preliminary findings are verified, this matter may be resolved through the entry of a Consent Order which will include a compliance schedule, an appropriate penalty, and reimbursement of the Department's costs and expenses. In accordance with the United States Environmental Protection Agency's (EPA) RCRA Civil Penalty Policy of 1990, the penalties which would be assessed in this case are \$14,900.00.

"More Protection, Less Process"

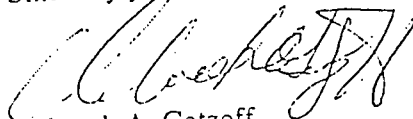
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ATTACH. 1

HOWCO ENVIRONMENTAL SERVICES
FLD 152 764 767
Warning Letter #241880
Page 2

Costs and expenses in this case will be a minimum of \$100. If this matter cannot be resolved within 90 days, under the Department's agreement with the EPA, a formal administrative complaint or "Notice of Violation" (NOV) must be issued against you within 150 days of the date of the attached inspection report. We look forward to your cooperation in completing the investigation and resolution of this matter.

Sincerely yours,



Deborah A. Getzoff
Director of District Management
Southwest District

DG/jmd

Enclosure

cc: Steve Ray, HWR Section
Compliance File ✓

PENALTY COMPUTATION WORKSHEET

Violator's Name: HOWCO Environmental Services

Identify Violator's Facility: FLD 152 764 767

Name of Department Staff Responsible for the Penalty Computations:

James M. Dregne

Date: February 28, 2001

PART I - Class B (no penalty) Determination

Rationale for Class B Determination: _____

Part II - Class A Penalty Determinations

Violation Type	Potential for Harm	Extent of Dev.	Matrix Amount	Multi-day	Total
1. <u>279.44(d)</u>	MAJOR	MINOR	4,600		4,600 droppes
2. <u>279.54(b)(1)</u>	MINOR	MAJOR	600 500		600 500
3. <u>279.54(f)(1)</u>	MINOR	MINOR	100		100
4. <u>62-710.510(2)</u>	MINOR	MAJOR	600		600 droppes
5. <u>62-710.850(6)(a)</u>	MAJOR MODERATE	MAJOR	8,000 3,200		8,000 3,200
6. <u>62-737.400(5)(b)(1)</u>	MINOR	MINOR	100		100
7. <u>Specific Condition II.2</u>	MINOR	MODERATE	200		200 droppes
8. <u>Specific Condition III.8</u>	MINOR	MAJOR	600		600 droppes
9. <u>General Condition 14(c)</u>	MINOR	MINOR	100		100

Total Penalties for all Violations: 4,000.00
~~\$14,900.00~~

* DEPARTMENT COST \$100.00



Jeb Bush
Governor

Department of Environmental Protection

Southwest District
3804 Coconut Palm Drive
Tampa, Florida 33619

David B. Struhs
Secretary

HAZARDOUS WASTE INSPECTION REPORT

1. INSPECTION TYPE: ☒ Routine ☐ Complaint ☒ Permitting ☐ Follow-Up ☐ Pre-Arranged

FACILITY NAME HOWCO Environmental Services EPA ID # FLD 152 764 767

STREET ADDRESS 843 43rd Street South, St. Petersburg, FL

MAILING ADDRESS 3701 Central Avenue, St. Petersburg, FL 33713

COUNTY Pinellas PHONE (727) 327-8467 DATE 09/19/00 TIME 10:20 am

NOTIFIED AS:

- ☐ Non Handler
☒ CESQG (<100 kg/mo.)
☐ SQG (100-1000 kg/mo.)
☐ Generator (>1000 kg/mo.)
☐ Transporter
☐ Transfer Facility
☐ Interim Status TSD Facility
☐ TSD Facility
☐ Unit Type(s):
☒ Used Oil: Processing Facility, Transporter
☒ Used Oil Filters: Processor, Transporter:

CURRENT STATUS:

- ☐ Non Handler
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☐ SQG (100-1000 kg/mo.)
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☐ Interim Status TSD Facility
☐ TSD Facility
☐ Unit Type(s):
☒ Used Oil: Processing Facility, Transporter
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2. APPLICABLE REGULATIONS:

- | | | | |
|--|---|---|---|
| <input checked="" type="checkbox"/> 40 CFR 261.5 | <input checked="" type="checkbox"/> 40 CFR 262 | <input type="checkbox"/> 40 CFR 263 | <input type="checkbox"/> 40 CFR 264 |
| <input type="checkbox"/> 40 CFR 265 | <input type="checkbox"/> 40 CFR 266 | <input type="checkbox"/> 40 CFR 268 | <input type="checkbox"/> 40 CFR 273 |
| <input checked="" type="checkbox"/> 40 CFR 279 | <input checked="" type="checkbox"/> 62-710, FAC | <input checked="" type="checkbox"/> 62-730, FAC | <input checked="" type="checkbox"/> 62-740, FAC |

3. RESPONSIBLE OFFICIAL(s):

Tim Hagan, President

4. INSPECTION PARTICIPANTS:

Dave Roehn – HOWCO	Lewis Sparks - HOWCO	Al Gephart - FDEP
Richard Dillen – HOWCO	Stanley Tam - FDEP	Jim Dregne – FDEP
Dave Thompson – HOWCO	Roger Evans - FDEP	

5. LATITUDE/LONGITUDE 27° 54' 00" 82° 38' 11"

6. SIC Code: 2999

7. TYPE OF OWNERSHIP: Private Federal State County Municipal

8. PERMIT #: 92465-HO06-001

ISSUE DATE: 08/03/2000

EXP. DATE: 08/03/2005

"More Protection, Less Process"

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9. PROCESS DESCRIPTION:

HOWCO Environmental Services is a used oil and material processing facility that stores, processes and markets used oil. HOWCO has been at its current location since 1972 and currently employs approximately forty people; thirty of which work at the 43rd Street processing facility. The 3.2 acre site contains an oil processing facility, an industrial wastewater pretreatment facility, storage tanks, vehicle maintenance garage and an on-site analytical laboratory. Administrative personnel and facility operating records are located and maintained at the Central Avenue office.

HOWCO operates about six used oil recovery trucks from their St. Petersburg location. The recovery trucks also provide other waste pumping services including waste removal from oil/water separators and car and truck wash pits. In addition to the St. Petersburg facility, HOWCO operates a used oil transfer facility in Ocala. The used oil waste stored in Ocala is brought to St. Petersburg for processing. A majority of the waste processed at the facility is brought to the facility in HOWCO owned trucks. The facility receives a few shipments of used oil each week from common carriers and independent oil transporters. Used oils collected by HOWCO trucks are initially screened by the drivers at the generator's site using a halogen "sniffer". Used oils transported to HOWCO by other vendors are required to include a manifest describing the material.

Used oil shipments arriving at HOWCO are sampled and analyzed in the facility's on-site laboratory prior to unloading. A representative sample of each incoming shipment is taken, using a bailer, and tested for total halogens using a bench top 200T x-ray analyzer. If the analysis indicates the halogen concentration is less than 999 ppm, the used oil is pumped into the tank farm. If total halogens are greater than 999 ppm the load is rejected unless the total halogens are less than 4,000 ppm and a rebuttable presumption is made. All oil is processed and marketed as "on-spec" used oil fuel to various burners. According to Mr. Hagan, the facility does not accept off-spec used oil or hazardous waste. Records of used oil that was tested and rejected by HOWCO was not being maintained on file for a minimum of three years. **This is a violation of 40 CFR 279.44(d).** Also, HOWCO drivers were not notifying the Department of any refusals to pick-up used oil from clients. **This is a violation of 62-710.510(2) F.A.C.**

Used oil is processed utilizing the Cooker Process. HOWCO discontinued the use of the distillation flash tower as part of their used oil processing several years ago. According to Mr. Hagan, the process was done only to remove light ends from the processed oil to meet a used oil specification of the phosphate industry. HOWCO discontinued selling oil to the phosphate industry for use in beneficiation in 1997. Used oil processed in the Cooker is pumped to Tank #100 or Tank #101 for thermal/chemical treatment. A de-emulsifier is added to the oil and the mixture is heated. The treated oil is then allowed to cool to facilitate the separation of water. Water that is recovered from these processes is treated in the facility's wastewater pretreatment plant prior to being discharged to the City of St. Petersburg POTW. The oil is then sent through a vibrascreen to separate out the solids. The solids from the vibrascreen are collected in a drum that was properly labeled, "Screen Filter Residue". The solids are sent to a solid waste landfill for disposal or processed for oil recovery. The solids from the vibrascreen are tested annually to ensure that they are not a hazardous waste.

At the time of the inspection, the facility's permit required that every tank (batch) of processed oil be sampled and tested to determine if the processed used oil meets the used oil fuel specifications. In the event a batch of processed used oil did not meet the on-spec requirements the batch would be re-processed and a notation would be made in the facility operating records indicating the batch number that was re-processed. Inspection of the analytical results of processed oil shipped from February 2000 through April 2000 indicated that all parameters were in compliance.

The facility also receives used oil filters, used antifreeze, non-hazardous solid waste, industrial wastewater, and petroleum contact water (PCW) for processing and disposal. The ultimate disposal of other waste is either

through the permitted discharge to the St. Petersburg POTW or to an off-site disposal facility. The processing of solid wastes is overseen by the Department's Solid Waste Management Section that has its own inspections and reporting requirements. On occasion, HOWCO may act as a broker for the disposal of hazardous waste for some clients. The hazardous waste that is brokered by HOWCO is not transported by HOWCO, but is transported directly from the generator to the disposal facility.

Crushed and uncrushed used oil filters are received in 55-gallon drums and stored on the south side of the property, west of the used oil filter crusher. At the time of the inspection, there were approximately 227 drums of used oil filters. The drums were sealed and properly labeled. After the filters have been removed from the 55-gallon drums, the empty drums are transferred to a drum washing area located west of the oil filter crusher. The drums are pressure washed with water. Diesel fuel or kerosene is used to "cut" the oil. The oily waste from the drum cleaning operation drains to a sump next to the wash area. The oily waste is then pumped from the sump to the water/oil processing facility. The area was clean and in good condition. However, there were several areas on the floor around the drum washer that require maintenance. The used oil filters are conveyed to a filter crusher. The used oil from draining the filters is collected in a drip pan under the filter crusher where it is pumped to an adjacent storage tank. The tank was properly labeled, "Used Oil". Periodically, the oil from the storage tank is removed and pumped into one of the facility's used oil storage tanks to be re-refined. Crushed filters are stored in either drums or dump trailers. Valves at the bottom of the dump trailers allow any remaining oil to be drained into a 55-gallon drum. At the time of the inspection there were two dump trailers on-site. One trailer was being loaded with crushed filters. The other trailer was loaded with filters and was awaiting disposal. The trailer awaiting disposal had a 55-gallon drum beneath the drain valve. The drum was not labeled, "Used Oil". This is a violation of 40 CFR 279.54(i)(1). Neither dump trailer was covered to protect the contents from the weather. This is a violation of 62-710.850(6)(a), F.A.C.. The drums and/or dump trailers of crushed filters are shipped to the Pinellas County incinerator for disposal or to U.S. Foundry, Medley, FL.

West of the used oil filter crusher was one container of a waste oil and water mixture that was structurally defective (an open slit down the side). This is a violation of 40 CFR 279.54(b)(1).

HOWCO routinely collects waste antifreeze from its customers. Records of the waste determinations for the spent antifreeze are maintained on-site in the form of a record of certification from each generator clearly stating the basis for determining that the waste antifreeze is non-hazardous. HOWCO requires that all antifreeze be tested for four contaminants of concern, Benzene, Lead, Trichloroethylene and Tetrachloroethylene. The facility may treat the non-hazardous waste antifreeze in its industrial wastewater pretreatment plant or ship it to another treatment facility for disposal or recycling. Any used oil present in the antifreeze will be removed by oil/water separation. A review of HOWCO's records showed that antifreeze waste determination records were complete.

Wastewater, including petroleum contact water (PCW), industrial wastewater, rainwater collected in secondary containment areas and water from the re-refining of used oil is accumulated and stored in aboveground storage tanks #151-155, #160-166, #170, #180, #191 and #192. The wastewater is treated in the pre-treatment system prior to discharging to the City of St. Petersburg POTW. Any oil recovered from the tanks by gravity separation is pumped back to the used oil tank farm for re-refining.

Solid waste managed at the facility includes oily solid waste generated by HOWCO and its clients. Solid wastes generated by HOWCO includes solids from the vibrascreen, tanker trucks, cone-bottom tank, oily solid batch treatment tank and storage tanks at the facility. The oily solids may be placed in drums, roll-off boxes, decontamination boxes or other containers for storage. The wastes are managed as non-hazardous waste. The waste solids are sampled and analyzed once per year to demonstrate that the waste is non-hazardous. For incoming solid wastes, each client is required to provide the necessary non-hazardous waste determination. A review of the sampling records indicated that the solid wastes were non-hazardous. The solid wastes are bulked and sent to an approved thermal facility or a licensed landfill for disposal. At the time of the inspection, there

were three roll-off boxes of solid waste in the Solids Storage and Sludge Separation Areas. The roll-offs were covered and properly labeled, "Processed Solid Waste". Also noted was that the discharge pipe from Tank #111 extends outside the secondary containment. Per Specific Condition IV.7(e), the facility is to ensure that Tank #111 discharges into a suitable container, and does not discharge onto the ground or asphalt pavement. It is recommended that the facility install a flexible pipe onto the discharge that would extend back into the area of secondary containment when there is no container under the discharge pipe.

The HOWCO tank farm consists of 48 aboveground storage tanks. The newest tank in the tank farm is a temporary 300 gallon diesel fuel tank that was placed within the secondary containment in Area #5. FDEP was not notified of the addition of this tank. This is in violation of Specific Condition II.2 in the facility's operating permit. Eighteen (18) of the tanks (approximate capacity of 339,420 gallons) are used to store used and re-refined used oil. The tanks have secondary containment consisting of oil impermeable concrete surfaces on the walls and floors to contain oil spills. Overall, the containment areas were clean and in good condition. However, containment areas #1 and #2, had pools of used oil due to leaking equipment. This is in violation of Specific Condition III.8 in the facility's operating permit. The tanks in the receiving area, Tanks 130 -135 were not labeled or marked with their contents. Initially there was some confusion over what each tank contained. Tanks 132, 134, and 135 were being used to store used oil exclusively. Failure to label used oil tanks with the words "Used Oil" is a violation of 40 CFR 279.54(f)(1).

Incoming and outgoing manifests for used oil, used oil filters, crushed oil filters, petroleum contact water and antifreeze are kept by HOWCO for at least three years. A random selection of customer files were inspected, all of which were found to be in compliance.

The Company had copies of its current registrations for used oil transporter, processor and marketer, and used oil filter transporter, transfer facility and processor. HOWCO also submitted its annual transporter report and its biennial processor report.

Fire extinguishers at the facility were serviced in June 2000. The fire and emergency equipment are inspected monthly and are tested annually. Located east of the truck wash rack is the facility's spill kit consisting of absorbents, blankets and booms. Inspection records were reviewed and found to be complete. Evacuation routes were posted at various locations and the emergency phone numbers were posted next to the phones.

The tanks and related piping are inspected monthly. The monthly inspection logs from January 2000 through August 2000 were found to be deficient because they are lacking the date and time the inspection was performed and the inspector's name. This is a violation of General Condition 14(c) in the facility's operating permit.

HOWCO employees receive training as outlined in the company's "Used Oil Training Program". The company's employees are provided initial and annual refresher training. The last annual refresher training was conducted on May 20, 2000, and July 29, 2000. Training records were reviewed and found to be complete.

Approximately twenty spent fluorescent light tubes (spent mercury containing lamps) were being improperly stored in the facility's laboratory. Spent mercury containing lamps must be stored in a way that prevents breakage. Failure to label each spent mercury-containing lamp or container of lamps with the words "Spent mercury-containing lamps for recycling" is a violation of 62-737.400(5)(b)(1), F.A.C.

10. SUMMARY OF ALLEGED VIOLATIONS:

40 CFR 279.44(d)

Failure to maintain all records of analysis used to comply with paragraphs (a), (b), (c) of the rebuttable presumption section for at least three years.

40 CFR 279.54(b)(1)	Failure to store used oil in containers that are in good condition.
40 CFR 279.54(f)(1)	Failure to properly label containers of used oil with the words "Used Oil".
62-710.510(2), FAC	Failure of drivers to notify the Department of any refusal to pick-up used oil from a client.
62-710.850(6)(a), FAC	Failure to cover containers of crushed used oil filters to protect the contents from the weather.
62-737.400(5)(b)(1), F.A.C.	Failure to label each spent mercury-containing lamp or container of lamps with the words "Spent mercury-containing lamps for recycling".
Specific Condition II.2	Failure to notify FDEP of the installation of a 300 gallon diesel fuel tank.
Specific Condition III.8	Failure to remove spilled or leaked waste within secondary containment areas.
General Condition 14(c)	Failure to note the date, time and inspector's name on the facility's monthly inspection forms.

11. RECOMMENDED CORRECTIVE ACTIONS:

40 CFR 279.44(d)	The facility shall ensure that all records of analyses of incoming used oil are maintained for at least three years.
40 CFR 279.54(b)(1)	The facility shall ensure that all containers of used oil are in good condition; the material is removed; or personnel over-pack defective containers.
40 CFR 279.54(f)(1)	Effective immediately and henceforth, the facility shall properly label all containers of used oil.
62-710.510(2) FAC	Effective immediately, the company shall notify the Department's District Office by letter or electronic mail of any refusal to pick-up used oil by a HOWCO transporter within 72 hours of the refusal.
62-710.850(6)(a), FAC	Effective immediately and henceforth, the facility shall ensure that all containers of crushed and uncrushed used oil filters are covered to protect the contents from the weather.
62-737.400(5)(b)(1), F.A.C.	Effective immediately each spent mercury-containing lamp or container of lamps shall be labeled with the words "Spent mercury-containing lamps for recycling".

Specific Condition II.2

The capacity of the facility's secondary containment is sufficient to handle any spills/leaks from the temporary storage tank of diesel fuel. Therefore, the facility may leave the tank at its current location for a period of 90 days or until the diesel fuel has been consumed, whichever occurs first. At that time, the facility shall cease to use the storage tank and (1) apply for a minor modification of its used oil processing permit to permanently include the tank in the tank farm for future use or (2), remove the tank and cease using it.

Specific Condition III.8

Effective immediately and henceforth, the facility shall remove spilled or leaked waste within secondary containment areas as described in Section 9.6 of the facility's permit application.

General Condition 14(c)

Effective immediately and henceforth, facility personnel shall note the date, time and inspector's name on all inspection logs.

Report Prepared By:

Al Gephart
Al Gephart
Engineer IV

Report Reviewed By:

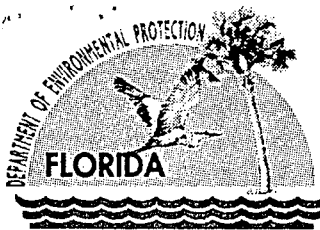
Jim Dreghe
Jim Dreghe
Environmental Specialist III

Report Approved By:

Elizabeth Knauss
Elizabeth Knauss
Environmental Manager

Date:

3/16/01



Jeb Bush
Governor

Department of Environmental Protection

Southwest District
3804 Coconut Palm Drive
Tampa, Florida 33619

David B. Struhs
Secretary

March 21, 2001

Mr. Tim Hagan
HOWCO Environmental Services
3701 Central Avenue
St. Petersburg, FL 33713

RE: HOWCO Environmental Services
EPA ID# FLD 152 764 767
Warning Letter #241880
Pinellas County

Dear Mr. Hagan:

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Section 403.727, Florida Statutes (F.S.) provides that it is a violation to fail to comply with rules adopted by the Department. The activities observed during the Department's field inspection and any other activities at your facility that may be contributing to violations of Florida Statutes or Department Rules should cease.

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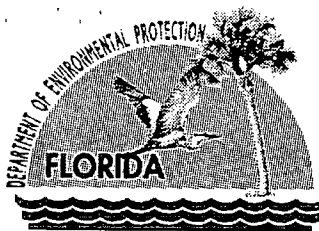


Deborah A. Getzoff
Director of District Management
Southwest District

DG/jmd

Enclosure

cc: Steve Ray, HWR Section
Compliance File ✓



Jeb Bush
Governor

Department of Environmental Protection

Southwest District
3804 Coconut Palm Drive
Tampa, Florida 33619

David B. Struhs
Secretary

HAZARDOUS WASTE INSPECTION REPORT

1. **INSPECTION TYPE:** ☒ Routine ☐ Complaint ☒ Permitting ☐ Follow-Up ☐ Pre-Arranged

FACILITY NAME HOWCO Environmental Services EPA ID # FLD 152 764 767

STREET ADDRESS 843 43rd Street South, St. Petersburg, FL

MAILING ADDRESS 3701 Central Avenue, St. Petersburg, FL 33713

COUNTY Pinellas PHONE (727) 327-8467 DATE 09/19/00 TIME 10:20 am

NOTIFIED AS:

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☐ Transporter
☐ Transfer Facility
☐ Interim Status TSD Facility
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2. APPLICABLE REGULATIONS:

- | | | | |
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| <input type="checkbox"/> 40 CFR 265 | <input type="checkbox"/> 40 CFR 266 | <input type="checkbox"/> 40 CFR 268 | <input type="checkbox"/> 40 CFR 273 |
| <input checked="" type="checkbox"/> 40 CFR 279 | <input checked="" type="checkbox"/> 62-710, FAC | <input checked="" type="checkbox"/> 62-730, FAC | <input checked="" type="checkbox"/> 62-740, FAC |

3. RESPONSIBLE OFFICIAL(s):

Tim Hagan, President

4. INSPECTION PARTICIPANTS:

Dave Roehn – HOWCO	Lewis Sparks - HOWCO	Al Gephart - FDEP
Richard Dillen – HOWCO	Stanley Tam - FDEP	Jim Dregne – FDEP
Dave Thompson – HOWCO	Roger Evans - FDEP	

5. **LATITUDE/LONGITUDE** 27° 54' 00" 82° 38' 11"

6. **SIC Code:** 2999

7. **TYPE OF OWNERSHIP:** Private Federal State County Municipal

8. **PERMIT #:** 92465-HO06-001 **ISSUE DATE:** 08/03/2000 **EXP. DATE:** 08/03/2005

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9. PROCESS DESCRIPTION:

HOWCO Environmental Services is a used oil and material processing facility that stores, processes and markets used oil. HOWCO has been at its current location since 1972 and currently employs approximately forty people; thirty of which work at the 43rd Street processing facility. The 3.2 acre site contains an oil processing facility, an industrial wastewater pretreatment facility, storage tanks, vehicle maintenance garage and an on-site analytical laboratory. Administrative personnel and facility operating records are located and maintained at the Central Avenue office.

HOWCO operates about six used oil recovery trucks from their St. Petersburg location. The recovery trucks also provide other waste pumping services including waste removal from oil/water separators and car and truck wash pits. In addition to the St. Petersburg facility, HOWCO operates a used oil transfer facility in Ocala. The used oil waste stored in Ocala is brought to St. Petersburg for processing. A majority of the waste processed at the facility is brought to the facility in HOWCO owned trucks. The facility receives a few shipments of used oil each week from common carriers and independent oil transporters. Used oils collected by HOWCO trucks are initially screened by the drivers at the generator's site using a halogen "sniffer". Used oils transported to HOWCO by other vendors are required to include a manifest describing the material.

Used oil shipments arriving at HOWCO are sampled and analyzed in the facility's on-site laboratory prior to unloading. A representative sample of each incoming shipment is taken, using a bailer, and tested for total halogens using a bench top 200T x-ray analyzer. If the analysis indicates the halogen concentration is less than 999 ppm, the used oil is pumped into the tank farm. If total halogens are greater than 999 ppm the load is rejected unless the total halogens are less than 4,000 ppm and a rebuttable presumption is made. All oil is processed and marketed as "on-spec" used oil fuel to various burners. According to Mr. Hagan, the facility does not accept off-spec used oil or hazardous waste. Records of used oil that was tested and rejected by HOWCO was not being maintained on file for a minimum of three years. **This is a violation of 40 CFR 279.44(d).** Also, HOWCO drivers were not notifying the Department of any refusals to pick-up used oil from clients. **This is a violation of 62-710.510(2) F.A.C.**

Used oil is processed utilizing the Cooker Process. HOWCO discontinued the use of the distillation flash tower as part of their used oil processing several years ago. According to Mr. Hagan, the process was done only to remove light ends from the processed oil to meet a used oil specification of the phosphate industry. HOWCO discontinued selling oil to the phosphate industry for use in beneficiation in 1997. Used oil processed in the Cooker is pumped to Tank #100 or Tank #101 for thermal/chemical treatment. A de-emulsifier is added to the oil and the mixture is heated. The treated oil is then allowed to cool to facilitate the separation of water. Water that is recovered from these processes is treated in the facility's wastewater pretreatment plant prior to being discharged to the City of St. Petersburg POTW. The oil is then sent through a vibrascreen to separate out the solids. The solids from the vibrascreen are collected in a drum that was properly labeled, "Screen Filter Residue". The solids are sent to a solid waste landfill for disposal or processed for oil recovery. The solids from the vibrascreen are tested annually to ensure that they are not a hazardous waste.

At the time of the inspection, the facility's permit required that every tank (batch) of processed oil be sampled and tested to determine if the processed used oil meets the used oil fuel specifications. In the event a batch of processed used oil did not meet the on-spec requirements the batch would be re-processed and a notation would be made in the facility operating records indicating the batch number that was re-processed. Inspection of the analytical results of processed oil shipped from February 2000 through April 2000 indicated that all parameters were in compliance.

The facility also receives used oil filters, used antifreeze, non-hazardous solid waste, industrial wastewater, and petroleum contact water (PCW) for processing and disposal. The ultimate disposal of other waste is either

through the permitted discharge to the St. Petersburg POTW or to an off-site disposal facility. The processing of solid wastes is overseen by the Department's Solid Waste Management Section that has its own inspections and reporting requirements. On occasion, HOWCO may act as a broker for the disposal of hazardous waste for some clients. The hazardous waste that is brokered by HOWCO is not transported by HOWCO, but is transported directly from the generator to the disposal facility.

Crushed and uncrushed used oil filters are received in 55-gallon drums and stored on the south side of the property, west of the used oil filter crusher. At the time of the inspection, there were approximately 227 drums of used oil filters. The drums were sealed and properly labeled. After the filters have been removed from the 55-gallon drums, the empty drums are transferred to a drum washing area located west of the oil filter crusher. The drums are pressure washed with water. Diesel fuel or kerosene is used to "cut" the oil. The oily waste from the drum cleaning operation drains to a sump next to the wash area. The oily waste is then pumped from the sump to the water/oil processing facility. The area was clean and in good condition. However, there were several areas on the floor around the drum washer that require maintenance. The used oil filters are conveyed to a filter crusher. The used oil from draining the filters is collected in a drip pan under the filter crusher where it is pumped to an adjacent storage tank. The tank was properly labeled, "Used Oil". Periodically, the oil from the storage tank is removed and pumped into one of the facility's used oil storage tanks to be re-refined. Crushed filters are stored in either drums or dump trailers. Valves at the bottom of the dump trailers allow any remaining oil to be drained into a 55-gallon drum. At the time of the inspection there were two dump trailers on-site. One trailer was being loaded with crushed filters. The other trailer was loaded with filters and was awaiting disposal. The trailer awaiting disposal had a 55-gallon drum beneath the drain valve. The drum was not labeled, "Used Oil". **This is a violation of 40 CFR 279.54(f)(1).** Neither dump trailer was covered to protect the contents from the weather. **This is a violation of 62-710.850(6)(a), F.A.C..** The drums and/or dump trailers of crushed filters are shipped to the Pinellas County incinerator for disposal or to U.S. Foundry, Medley, FL.

West of the used oil filter crusher was one container of a waste oil and water mixture that was structurally defective (an open slit down the side). **This is a violation of 40 CFR 279.54(b)(1).**

HOWCO routinely collects waste antifreeze from its customers. Records of the waste determinations for the spent antifreeze are maintained on-site in the form of a record of certification from each generator clearly stating the basis for determining that the waste antifreeze is non-hazardous. HOWCO requires that all antifreeze be tested for four contaminants of concern, Benzene, Lead, Trichloroethylene and Tetrachloroethylene. The facility may treat the non-hazardous waste antifreeze in its industrial wastewater pretreatment plant or ship it to another treatment facility for disposal or recycling. Any used oil present in the antifreeze will be removed by oil/water separation. A review of HOWCO's records showed that antifreeze waste determination records were complete.

Wastewater, including petroleum contact water (PCW), industrial wastewater, rainwater collected in secondary containment areas and water from the re-refining of used oil is accumulated and stored in aboveground storage tanks #151-155, #160-166, #170, #180, #191 and #192. The wastewater is treated in the pre-treatment system prior to discharging to the City of St. Petersburg POTW. Any oil recovered from the tanks by gravity separation is pumped back to the used oil tank farm for re-refining.

Solid waste managed at the facility includes oily solid waste generated by HOWCO and its clients. Solid wastes generated by HOWCO includes solids from the vibrascreen, tanker trucks, cone-bottom tank, oily solid batch treatment tank and storage tanks at the facility. The oily solids may be placed in drums, roll-off boxes, decontamination boxes or other containers for storage. The wastes are managed as non-hazardous waste. The waste solids are sampled and analyzed once per year to demonstrate that the waste is non-hazardous. For incoming solid wastes, each client is required to provide the necessary non-hazardous waste determination. A review of the sampling records indicated that the solid wastes were non-hazardous. The solid wastes are bulked and sent to an approved thermal facility or a licensed landfill for disposal. At the time of the inspection, there

were three roll-off boxes of solid waste in the Solids Storage and Sludge Separation Areas. The roll-offs were covered and properly labeled, "Processed Solid Waste". Also noted was that the discharge pipe from Tank #111 extends outside the secondary containment. Per Specific Condition IV.7(e), the facility is to ensure that Tank #111 discharges into a suitable container, and does not discharge onto the ground or asphalt pavement. It is recommended that the facility install a flexible pipe onto the discharge that would extend back into the area of secondary containment when there is no container under the discharge pipe.

The HOWCO tank farm consists of 48 aboveground storage tanks. The newest tank in the tank farm is a temporary 300 gallon diesel fuel tank that was placed within the secondary containment in Area #5. FDEP was not notified of the addition of this tank. **This is in violation of Specific Condition II.2 in the facility's operating permit.** Eighteen (18) of the tanks (approximate capacity of 339,420 gallons) are used to store used and re-refined used oil. The tanks have secondary containment consisting of oil impermeable concrete surfaces on the walls and floors to contain oil spills. Overall, the containment areas were clean and in good condition. However, containment areas #1 and #2, had pools of used oil due to leaking equipment. **This is in violation of Specific Condition III.8 in the facility's operating permit.** The tanks in the receiving area, Tanks 130 -135 were not labeled or marked with their contents. Initially there was some confusion over what each tank contained. Tanks 132, 134, and 135 were being used to store used oil exclusively. **Failure to label used oil tanks with the words "Used Oil" is a violation of 40 CFR 279.54(f)(1).**

Incoming and outgoing manifests for used oil, used oil filters, crushed oil filters, petroleum contact water and antifreeze are kept by HOWCO for at least three years. A random selection of customer files were inspected, all of which were found to be in compliance.

The Company had copies of its current registrations for used oil transporter, processor and marketer, and used oil filter transporter, transfer facility and processor. HOWCO also submitted its annual transporter report and its biennial processor report.

Fire extinguishers at the facility were serviced in June 2000. The fire and emergency equipment are inspected monthly and are tested annually. Located east of the truck wash rack is the facility's spill kit consisting of absorbents, blankets and booms. Inspection records were reviewed and found to be complete. Evacuation routes were posted at various locations and the emergency phone numbers were posted next to the phones.

The tanks and related piping are inspected monthly. The monthly inspection logs from January 2000 through August 2000 were found to be deficient because they are lacking the date and time the inspection was performed and the inspector's name. **This is a violation of General Condition 14(c) in the facility's operating permit.**

HOWCO employees receive training as outlined in the company's "Used Oil Training Program". The company's employees are provided initial and annual refresher training. The last annual refresher training was conducted on May 20, 2000, and July 29, 2000. Training records were reviewed and found to be complete.

Approximately twenty spent fluorescent light tubes (spent mercury containing lamps) were being improperly stored in the facility's laboratory. Spent mercury containing lamps must be stored in a way that prevents breakage. **Failure to label each spent mercury-containing lamp or container of lamps with the words "Spent mercury-containing lamps for recycling" is a violation of 62-737.400(5)(b)(1), F.A.C.**

10. SUMMARY OF ALLEGED VIOLATIONS:

40 CFR 279.44(d)

Failure to maintain all records of analysis used to comply with paragraphs (a), (b), (c) of the rebuttable presumption section for at least three years.

40 CFR 279.54(b)(1)	Failure to store used oil in containers that are in good condition.
40 CFR 279.54(f)(1)	Failure to properly label containers of used oil with the words "Used Oil".
62-710.510(2), FAC	Failure of drivers to notify the Department of any refusal to pick-up used oil from a client.
62-710.850(6)(a), FAC	Failure to cover containers of crushed used oil filters to protect the contents from the weather.
62-737.400(5)(b)(1), F.A.C.	Failure to label each spent mercury-containing lamp or container of lamps with the words "Spent mercury-containing lamps for recycling".
Specific Condition II.2	Failure to notify FDEP of the installation of a 300 gallon diesel fuel tank.
Specific Condition III.8	Failure to remove spilled or leaked waste within secondary containment areas.
General Condition 14(c)	Failure to note the date, time and inspector's name on the facility's monthly inspection forms.

11. RECOMMENDED CORRECTIVE ACTIONS:

40 CFR 279.44(d)	The facility shall ensure that all records of analyses of incoming used oil are maintained for at least three years.
40 CFR 279.54(b)(1)	The facility shall ensure that all containers of used oil are in good condition; the material is removed; or personnel over-pack defective containers.
40 CFR 279.54(f)(1)	Effective immediately and henceforth, the facility shall properly label all containers of used oil.
62-710.510(2) FAC	Effective immediately, the company shall notify the Department's District Office by letter or electronic mail of any refusal to pick-up used oil by a HOWCO transporter within 72 hours of the refusal.
62-710.850(6)(a), FAC	Effective immediately and henceforth, the facility shall ensure that all containers of crushed and uncrushed used oil filters are covered to protect the contents from the weather.
62-737.400(5)(b)(1), F.A.C.	Effective immediately each spent mercury-containing lamp or container of lamps shall be labeled with the words "Spent mercury-containing lamps for recycling".

Specific Condition II.2

The capacity of the facility's secondary containment is sufficient to handle any spills/leaks from the temporary storage tank of diesel fuel. Therefore, the facility may leave the tank at its current location for a period of 90 days or until the diesel fuel has been consumed, whichever occurs first. At that time, the facility shall cease to use the storage tank and (1) apply for a minor modification of its used oil processing permit to permanently include the tank in the tank farm for future use or (2), remove the tank and cease using it.

Specific Condition III.8

Effective immediately and henceforth, the facility shall remove spilled or leaked waste within secondary containment areas as described in Section 9.6 of the facility's permit application.

General Condition 14(c)

Effective immediately and henceforth, facility personnel shall note the date, time and inspector's name on all inspection logs.

Report Prepared By: Al Gephart
Al Gephart
Engineer IV

Report Reviewed By: Jim Dregne
Jim Dregne
Environmental Specialist III

Report Approved By: Elizabeth Knauss Date: 3/16/01
Elizabeth Knauss
Environmental Manager

USED OIL PROCESSOR CHECKLIST

Facility Name: HOWCO ENVIRONMENTAL SERV. Date: 9/19/00
Facility Representative: ROEHN/DILLEN Facility ID: FLD 152 764 767
Inspector: TAM/EVANS/GEPHART/DRUGONE Registration # _____

40 CFR 279 Subpart F -- Processor Standards

1. Is the facility exempt under any of the following? (279.50(a)) Y _____ N ✓
Transporter or burner processing incidental to normal course of operations? Y _____ N ✓
Processors who also generate, transport, market, dispose or burn used oil must comply with the applicable Subparts of Part 279.
2. Does the processor have an EPA ID Number? (279.51(a)) Y ✓ N _____
3. Is the processor Registered? (62-710.500(1)(b)) Y ✓ N _____
4. Does the processor have a general permit? 62-710.800(1) Y _____ N ✓ *
* HAS A USED OIL OPERATING PERMIT.
5. For new facilities, was the notification of intent to use the general permit submitted 30 days prior to beginning operation? For existing facilities, was the notification for renewal submitted 30 days prior to expiration of the general permit? (62-710.800(2)) Y _____ NA ✓

Oil Filter Processing Standards-- 62-710.850 F.A.C.

1. Does the facility process used oil filters by removing oil, draining, crushing or element separation? Describe in narrative. Generators who process their own filters are not regulated provided the filters are not disposed of in a landfill but are managed by a registered processor. Y ✓ N _____
Is the facility a registered used oil filter processor? (62-710.850) Y ✓ N _____
2. Are the filters stored in above ground containers which are: (62-710.850(6))
In good condition? Y ✓ N _____
Closed or otherwise protected from weather? Y _____ N ✓
Labeled "Used Oil Filters"? Y ✓ N _____
Stored on an oil impervious surface? Y ✓ N _____
3. Are records maintained on DEP Form 62-710.900(2) or equivalent that include: (62-710.850(5)(a))
Destination or end use of the processed filters? Y ✓ N _____
Name and street address of each destination or end user? Y ✓ N _____
Are copies kept at the facility's street address for 3 years? (62-710.850(5)(b)) Y ✓ N _____
4. Is an Annual Report submitted by March 1 for the previous calendar year summarizing the above records? (62-710.850(5)(c)) Y ✓ N _____

Facility Name: DWCO

Date: September 19, 2000

Oil Management Standards - 279.54

1. Is used oil stored only in tanks or containers? (Circle applicable units) Y ☒ N ☐

2. If the facility has tanks, do they comply with 62-761 and ~~62-762~~ F. A. C. rules? Y ☒ N ☐

(Applicable to USTs over 100 g and ASTs over 550 gallons. Describe in narrative, including number and size of tanks, noting registration numbers if applicable, and compliance status.)

Is secondary containment consisting of a floor and dike which are impervious to oil provided for ASTs? Applies to all ASTs regardless of size per 279.54(d & e) Y ☒ N ☐

③ Are containers and tanks in good condition and not leaking? (279.54(b)) *drum split* Y ☐ N ☒

4. Are containers provided with secondary containment consisting of walls and floor at a minimum? (279.54(c)) Y ☒ N ☐

Is the containment system impervious to oil so as to prevent migration? Y ☒ N ☐

⑤ Are ASTs, UST tank fill lines and containers labeled "used oil"? (279.54(f)) Y ☐ N ☒
130 series tanks not labeled

⑥ Does the facility stop operations and clean up releases of used oil, repairing or replacing any leaking units as applicable? (279.54(g)) *leaking pumps* Y ☐ N ☒

General Facility Standards - 279.52

1. Is the facility maintained and operated to prevent a fire, explosion or planned or unplanned release of used oil to the air, soil, or water which could threaten human health or the environment? (279.52(a)(1)) Y ☒ N ☐

2. Does the facility have an internal communication or alarm system capable of giving immediate emergency instruction to facility personnel? (279.52(a)) Y ☒ N ☐

3. Is there a telephone, alarm, 2-way radio or other device at the scene of operations immediately available and capable of summoning assistance from local fire departments? (279.52(a)(2)(ii)) Y ☒ N ☐

Is there immediate access to this equipment by all personnel who are engaged in pouring, mixing, spreading or otherwise handled, either directly or by voice or visual contact with another employee? (279.52(a)(4)) Y ☒ N ☐

4. Describe fire control equipment. Is it adequate? (279.52(a)(2)(iii)) Y ☒ N ☐

5. Is spill control and decontamination equipment present? (279.52(a)(2)(iii)) Y ☒ N ☐

6. If sprinklers, water hoses or foam producing equipment is part of the facility fire control equipment, is water available at adequate volume and pressure? (279.52(a)(2)(iii)) Y ☒ N ☐

7. Is the emergency equipment inspected and tested periodically? Frequency? Annually Y ☒ N ☐

Facility Name: Howco

Date: September 19, 2000

8. Is there adequate aisle space to allow unobstructed movement of facility personnel and emergency equipment to any area of the facility where needed? (279.52(a)(5i)) Y. ☒ N. ☐
9. Has the facility made emergency response arrangements with the following: (279.52(a)(6))
- Fire Department: _____ Y. ☒ N. ☐
- Police: _____ Y. ☒ N. ☐
- Hospital: _____ Y. ☒ N. ☐
- Emergency Response Contractor: _____ Y. ☒ N. ☐
10. If not, has the facility attempted to do so and is the refusal documented? Y. ☒ N. ☐

Contingency Plans and Emergency Response – 279.52(b)

- | | |
|--|---|
| 1. Does the facility have a contingency plan? | Y <input checked="" type="checkbox"/> N <input type="checkbox"/> |
| 2. Is it at the facility and easily available? | Y <input checked="" type="checkbox"/> N <input type="checkbox"/> |
| 3. Does the plan include: | |
| Fire Response Procedure: (compare to 279.52(b)(6)) | N/A <input type="checkbox"/> Y <input checked="" type="checkbox"/> N <input type="checkbox"/> |
| Spill Response Procedures: " | N/A <input type="checkbox"/> Y <input checked="" type="checkbox"/> N <input type="checkbox"/> |
| Explosion Response Procedures: " | N/A <input type="checkbox"/> Y <input checked="" type="checkbox"/> N <input type="checkbox"/> |
| Instructions for handling contaminated materials & residues | Y <input checked="" type="checkbox"/> N <input type="checkbox"/> |
| A description of arrangements with local authorities: | N/A <input type="checkbox"/> Y <input checked="" type="checkbox"/> N <input type="checkbox"/> |
| Emergency Coordinators: (Name) <u>Tim Hagen</u> | Y <input checked="" type="checkbox"/> N <input type="checkbox"/> |
| Addresses and telephone numbers of Emergency Coordinators: | Y <input checked="" type="checkbox"/> N <input type="checkbox"/> |
| Emergency equipment list: | Y <input checked="" type="checkbox"/> N <input type="checkbox"/> |
| Specifications and capabilities of emergency equipment: | Y <input checked="" type="checkbox"/> N <input type="checkbox"/> |
| Locations of emergency equipment: | Y <input checked="" type="checkbox"/> N <input type="checkbox"/> |
| An evacuation plan and routes: | Y <input checked="" type="checkbox"/> N <input type="checkbox"/> |
| Evacuation/alarm signals: | Y <input checked="" type="checkbox"/> N <input type="checkbox"/> |
| External reporting procedures: | Y <input checked="" type="checkbox"/> N <input type="checkbox"/> |
| Internal recordkeeping requirements: | Y <input checked="" type="checkbox"/> N <input type="checkbox"/> |
| 4. Is the plan up to date, with no changes to the list of emergency equipment, list of emergency coordinators, applicable regulations or contingency plan failures since the last revision? (279.52(b)(4)) | Y <input checked="" type="checkbox"/> N <input type="checkbox"/> |
| 5. Has the plan been distributed to the local police, fire department, ERT and hospital? <u>Circle omitted authorities.</u> (279.52(b)(3)) | Y <input checked="" type="checkbox"/> N <input type="checkbox"/> |
| 6. Is the emergency coordinator authorized to commit funds for incident response? | Y <input checked="" type="checkbox"/> N <input type="checkbox"/> |
| 7. Has the processor noted in the operating record any incidents requiring implementation of the contingency plan? (279.52(b)(6)(ix)) | Y <input checked="" type="checkbox"/> N <input type="checkbox"/> |
| 9. Were written reports made within 15 days to the DEP? (279.52(b)(6)(ix)) | Y <input type="checkbox"/> N <input checked="" type="checkbox"/> |

Facility Name: LOWCO

Date: September 19, 2000

Rebuttable Presumption and Analysis Plan – 279.53, 279.55

1. Does the processor have a written analysis plan to determine whether used oil stored at the facility has a total halogen content above or below 1,000 ppm and whether the facility's used oil fuel meets the used oil specification? (279.55)(a)) Y ☒ N ☐
2. Is the 1,000 ppm halogen determination made by testing? Y ☒ N ☐
 - If so, does the analysis plan cover: (279.55(a)(2))
 - Sampling methods? Y ☒ N ☐
 - Frequency of sampling? Y ☒ N ☐
 - Analytical Methods? Y ☒ N ☐
 - Is the 1,000 ppm halogen determination made by process knowledge? Y ☐ N ☒
 - If so, is the type of information that will be used to determine the halogen content stated in the analysis plan? (279.55(a)(3)) Y ☒ N ☐
3. Have any analyses showed exceedances of the 1,000 ppm level? Y ☒ N ☐
 - If so, was the oil managed as hazardous waste? Y ☐ N ☒
 - If not, was the oil exempt? Describe basis for presumption rebuttal in narrative. (ex. analysis, refrigerant oil, etc.) N/A ☐ Y ☒ N ☐
4. Is the used oil fuel specification determination made by testing?
 - If so, does the analysis plan cover: (279.55(b)(2))
 - Sampling methods? Y ☒ N ☐
 - Whether the oil will be tested before or after processing? Y ☒ N ☐
 - Frequency of sampling? Y ☒ N ☐
 - Analytical Methods? Y ☒ N ☐
 - Is the used oil fuel specification determination made by process knowledge? Y ☐ N ☒
 - If so, is the type of information that will be used to determine the halogen content stated in the analysis plan? (279.55(b)(3)) Y ☒ N ☐
5. Are all oil processing residues managed as used oil, reclaimed, or used as asphalt manufacture feedstock? (279.59) N/A ☐ Y ☐ N ☒
 - If not, has the processor conducted a hazardous waste determination? (279.10(e)) N/A ☐ Y ☒ N ☐
6. Are test records or copies of records providing basis for determinations kept for 3 years? Y ☒ N ☐

Facility Name: Howco
Date: September 19, 2000

Recordkeeping and Reporting – 279.57, 62-710.510-520 F.A.C.

1. Do used oil acceptance records include: (279.56(a))

Name & address of the generator or off site source of the used oil?	Y <u>✓</u>	N <u> </u>
EPA ID # of oil provider (if applicable)?	Y <u>✓</u>	N <u> </u>
Name & Address of the transporter delivering the oil to the facility?	Y <u>✓</u>	N <u> </u>
EPA ID # of the transporter delivering the oil	Y <u>✓</u>	N <u> </u>
Quantity of oil shipped?	Y <u>✓</u>	N <u> </u>
Type of oil received (62-710.510(1)(c))	Y <u>✓</u>	N <u> </u>
Date of shipment?	Y <u>✓</u>	N <u> </u>

2. Do used oil delivery records include: (279.56(b), also check marketer requirements)

Name & Address of receiving facility? (burner, processor or disposal site)	Y <u>✓</u>	N <u> </u>
EPA ID # of receiving facility?	Y <u>✓</u>	N <u> </u>
Name & Address of transporter delivering the oil?	Y <u>✓</u>	N <u> </u>
EPA ID # of transporter?	Y <u>✓</u>	N <u> </u>
Quantity of oil delivered?	Y <u>✓</u>	N <u> </u>
End Use of the oil? (62-710.510(1)(e))	Y <u>✓</u>	N <u> </u>
Date of delivery?	Y <u> </u>	N <u> </u>

3. Does the facility keep records on DEP Form 62-710.900(2) or equivalent? (62-710.501(1))

Y ✓ N

4. Does the facility submit an annual report by March 1 summarizing the on site records for the previous calendar year? (62-710.520)

Y ✓ N

If not, is the facility an electric utility processing only self generated used oil for recycling, which is exempt from state registration and reporting requirements? (62-710.530)?

Y N

5. Does the transporter keep copies of the record and reports for three years at the street address of the facility? (62-710.510(2))

Y ✓ N

Closure – 62-710.800(3) F.A.C. and 279.54(h)

1. Has the facility submitted a written closure plan? (62-710.800(3)(a))

Y ✓ N

2. Does the plan include procedures for removing containers of oil and residues?

Y ✓ N

Cleaning and decontaminating tanks and ancillary equipment?

Y ✓ N

Removing contaminated soils?

Y ✓ N

Eliminating the need for further maintenance?

Y ✓ N

If the facility operated tank systems, and not all contaminated soils can be practicably removed, the owner or operator must close the facility as a hazardous waste landfill.

USED OIL TRANSPORTER CHECKLIST

Facility Name: Howson Date: September 19, 2000
Facility Representative: Roehn/Dillen Facility ID # FLD 152 764 767
Inspector: TAM/EVANS/GEHART/DREYER

40 CFR 279 Subpart E -- Transporter Standards

1. Is the facility exempt under any of the following? [279.40(a)] Y____ N ✓
On site transport?
Generator transporting < 55 g /time to a collection center?
Transporter of < 55 g /time from generator to aggregation point owned by same generator?
2. If the transporter also transports hazardous waste in the same trucks as are used to transport used oil, are the vehicles emptied per 261.7 after HW shipments? (If not, the used oil must be managed as hazardous) Y____ N/A ✓
3. Does the transporter process used oil incidental to transport? [279.41] Y____ N ✓
Are any residues managed as used oil, reclaimed, or used as asphalt manufacture feedstock? N/A ✓ Y____ N____
If not, has the transporter conducted a hazardous waste determination? [279.10(e)] N/A ✓ Y____ N____
4. Has the facility notified of used oil activities? Check EPA form 8700-12. Y ✓ N____
5. Does the transporter only deliver used oil to other transporters, oil processors, off specification used oil burners with EPA ID Numbers, or to on-specification oil burners? [279.43(a)] Y ✓ N____
6. Does the transporter comply with DOT requirements? [279.43(b)] Y ✓ N____
7. If any oil is discharged during transport, does the transporter: [279.43(c)]
Notify National Response Center and State Warning Point and Coast Guard per 33 CFR 153.203, as applicable? Y ✓ N____
Report to DOT in writing per 49 CFR 171.16? Y ✓ N____
Clean up any discharges until the discharge poses no threat? Y ✓ N____
8. Does the facility also transport used oil filters? Y ✓ N____
If so, are the filters stored in above ground containers which are: [62-710.850(6)]
In good condition? Y ✓ N____
Closed or otherwise protected from weather? Y ✓ N____
Labeled "Used Oil Filters"? Y ✓ N____
Stored on an oil impervious surface? Y ✓ N____

Facility: Hou
Date: September 19, 2000

Transporter Recordkeeping -- 279.46

1. Do used oil acceptance records include: [279.46(a)]

Name & Address of facility providing the oil for transport?	Y <input checked="" type="checkbox"/>	N <input type="checkbox"/>
EPA ID # of oil provider (if applicable)?	Y <input checked="" type="checkbox"/>	N <input type="checkbox"/>
Quantity of oil shipped?	Y <input checked="" type="checkbox"/>	N <input type="checkbox"/>
Date of shipment?	Y <input checked="" type="checkbox"/>	N <input type="checkbox"/>
Signature of oil provider, dated upon receipt?	Y <input checked="" type="checkbox"/>	N <input type="checkbox"/>

2. Do used oil delivery records include: [279.46(b)]

Name & Address of receiving facility or transporter?	Y <input checked="" type="checkbox"/>	N <input type="checkbox"/>
EPA ID # of receiving facility or transporter?	Y <input checked="" type="checkbox"/>	N <input type="checkbox"/>
Quantity of oil delivered?	Y <input checked="" type="checkbox"/>	N <input type="checkbox"/>
Date of delivery?	Y <input checked="" type="checkbox"/>	N <input type="checkbox"/>
Signature of oil receiver, dated upon receipt?	Y <input checked="" type="checkbox"/>	N <input type="checkbox"/>

3. Do the above records also include state required information on the type of oil and destination or end use? [62-710.510(1)(c & e)]

Y ☒ N ☐

4. Does the facility keep records on DEP Form 62-701.900(13) or equivalent? [62-710.510(1)]

Y ☒ N ☐

5. Does the facility submit an annual report on DEP Form 62-701.900(14) by March 1 summarizing the on site records for the previous calendar year? [62-710.510(5)]

Y ☒ N ☐

If not, is the facility a generator who transport only their own used oil generated at their own non-contiguous operations to their own central collection facility for storage prior to having their used oil picked up by a certified used oil transporter?
[62-710.510(3)]

Y ☒ N ☐

7. Does the transporter keep copies of the record and reports for three years at the street address of the facility? [62-710.510(4)]

Y ☒ N ☐

8. Does the transporter sell to burners or claim that any oil meets the specification? If so, complete the USED OIL MARKETER checklist.

Y ☐ N ☐

Transporter Certification -- 62-710 F.A.C.

1. Is the transporter certified? (local governments, and < 55g/time transporters are exempt) [62-710.600]

Y ☒ N ☐

2. Does the facility maintain training records? [62-710.600(2)(c)]

Y ☒ N ☐

3. Does the facility maintain insurance or financial assurance of \$100,000 combined single limit? [62-710.600(2)(d)]

Y ☒ N ☐

4. Is the facility registration form and ID number displayed at the facility? [62-710.500(4)]

Y ☒ N ☐

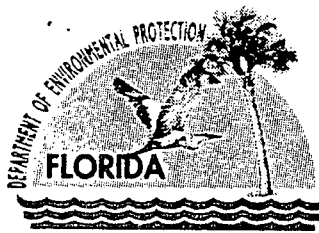
Facility: Ho Co
Date: September 19, 2000

Rebuttable Presumption -- 279.44

1. Does the transporter determine whether used oil stored being transported or stored at a transfer facility has a total halogen content above or below 1,000 ppm? Y ✓ N
- Is this done by testing? Y ✓ N
- Is this done by process knowledge? Describe basis in narrative. Y N ✓
- Are test records or copies of records providing basis for determination kept for 3 years? [279.44(d)] Y ✓ N
2. Have any analyses showed exceedances of the 1,000 ppm level? Y ✓ N
- If so, was the oil managed as hazardous waste? Y N ✓
- If not, was the oil exempt? Describe in narrative. N/A Y ✓ N

Transfer Facility Standards -- 279.45

- 1 Does the transporter store used oil at any transportation related facility (including parking lots) for more than 24 hours and not longer than 35 days during the normal course of transport? Transfer facilities storing used oil more than 35 days must comply with 279 Subpart F N/A ✓ Y N
- Is the transfer facility registered per 62-710.500(1)(a) F. A. C.? Y N
2. Is used oil stored only in tanks or containers? (Circle applicable units) Y N
3. If the facility has tanks, do they comply with 62-761 F. A. C. rules? (Describe in narrative, including number and size of tanks, noting registration numbers if applicable, and compliance status.) Y N
- Is secondary containment provided and adequate? Y N
4. Are containers, and tank trailers in good condition and not leaking? Y N
5. Are containers provided with secondary containment consisting of walls and floor at a minimum? Y N
- Is the containment system impervious to oil so as to prevent migration? Y N
6. Are ASTs, UST tank fill lines and containers labeled "used oil"? Y N
7. Are used oil filters stored more than 10 days? Y N
- If so, is the facility a registered used oil filter transfer facility? [62-710.850] N/A Y N
8. Does the facility stop operations and clean up releases of used oil, repairing or replacing any leaking units as applicable? Y N



Jeb Bush
Governor

Department of Environmental Protection

Southwest District
3804 Coconut Palm Drive
Tampa, Florida 33619

David B. Struhs
Secretary

September 28, 1999

Mr. Dave Roehm
Howco Environmental Services
3701 Central Avenue
St. Petersburg, FL 33713

**Re: Howco Environmental Services
Pinellas County
EPA ID No.: FLD 152 764 767**

Dear Mr. Roehm:

Thank you for your assistance during the Resource Conservation and Recovery Act (RCRA) compliance inspection conducted on September 17, 1999. Enclosed is the inspection report generated from this visit. Based upon the information gathered from this inspection, Howco Environmental Services was found to be in compliance with RCRA regulations governing used oil transporters, processors and marketers.

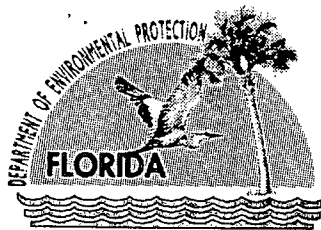
If you have any questions, or if I can be of further assistance to you, please contact me at (813) 744-6100, extension 379.

Sincerely,

Simone M. Core
Environmental Specialist I
Division of Waste Management

Enclosure

cc: Morgan Leibrandt, BWP&R
Charlie Ryburn, Pinellas Co. DEM
Compliance file



Jeb Bush
Governor

Department of Environmental Protection

Southwest District
3804 Coconut Palm Drive
Tampa, Florida 33619

David B. Struhs
Secretary

HAZARDOUS WASTE INSPECTION REPORT

1. INSPECTION TYPE: ☒ Routine ☐ Complaint ☐ Permitting ☐ Follow-Up ☐ Pre-Arranged

FACILITY NAME Howco Environmental Services EPA ID # FLD 152 764 767

STREET ADDRESS 843 43rd Street South, St. Petersburg, FL 33711

MAILING ADDRESS 3701 Central Avenue, St. Petersburg, FL 33713

COUNTY Pinellas PHONE (727)327-8467 DATE September 17, 1999 TIME 9:50 a.m.

NOTIFIED AS: ☐ Non-notifier

- ☐ Non Handler
- ☐ CESQG (<100 kg/mo.)
- ☐ SQG (100-1000 kg/mo.)
- ☐ Generator (>1000 kg/mo.)
- ☐ Transporter
- ☐ Transfer Facility
- ☐ Interim Status TSD Facility
- ☐ TSD Facility
- ☐ Unit Type(s):
- ☐ Exempt Treatment Facility
- ☒ Used Oil:

CURRENT STATUS:

- ☐ Non Handler
- ☐ CESQG (<100 kg/mo.)
- ☐ SQG (100-1000 kg/mo.)
- ☐ Generator (>1000 kg/mo.)
- ☐ Transporter
- ☐ Transfer Facility
- ☐ Interim Status TSD Facility
- ☐ TSD Facility
- ☐ Unit Type(s):
- ☐ Exempt Treatment Facility
- ☒ Used Oil:

2. APPLICABLE REGULATIONS:

- | | | | |
|--|---|--------------------------------------|---|
| <input type="checkbox"/> 40 CFR 261.5 | <input type="checkbox"/> 40 CFR 262 | <input type="checkbox"/> 40 CFR 263 | <input type="checkbox"/> 40 CFR 264 |
| <input type="checkbox"/> 40 CFR 265 | <input type="checkbox"/> 40 CFR 266 | <input type="checkbox"/> 40 CFR 268 | <input type="checkbox"/> 40 CFR 273 |
| <input checked="" type="checkbox"/> 40 CFR 279 | <input checked="" type="checkbox"/> 62-710, FAC | <input type="checkbox"/> 62-737, FAC | <input checked="" type="checkbox"/> 62-740, FAC |

3. RESPONSIBLE OFFICIAL(s):

Dave Roehm, Plant Manager

Tim Hagan, Owner

4. INSPECTION PARTICIPANTS:

Dave Roehm, Howco

Randall Strauss and Simone Core, FDEP

5. LATITUDE/LONGITUDE 27° 45' 41" 82° 41' 33"

6. SIC Code: 2999, 4953

7. TYPE OF OWNERSHIP: Private Federal State County Municipal

8. PERMIT #: N/A ISSUE DATE: EXP. DATE:

"Protect, Conserve and Manage Florida's Environment and Natural Resources"

9. Facility Description:

Howco is a used oil transporter, processor and marketer. The facility also picks-up used oil filters, used antifreeze, non-hazardous solid waste, industrial wastewater and petroleum contact water (PCW) for processing or disposal. Representing the facility was Mr. Dave Roehm – Plant Manager. The facility operates at 843 43rd Street South, St. Petersburg and was last inspected by the Department's hazardous waste section on September 29, 1998.

The process has not changed since the last inspection. The main areas of the plant are: industrial wastewater pretreatment plant, oil processing area, oil storage tank area, sludge separation area, the pad where drum washing, filter crushing and sludge pressing occurs, laboratory and the vehicle maintenance area.

The wastewater plant is contained within a concrete block dike (4' 3" high) which acts as a secondary containment area. Oil/water separation occurs in vertical tanks and the separated oil is pumped back to the oil plant for processing. Separator water is treated in two air strippers to remove volatile compounds. Lime and polymer is added to create flocs which is pumped to the sludge tank. The wastewater is then discharged to St. Petersburg POTW. Tank #140 (sump tank) located in this area of the facility has been sandblasted and internally lined approximately three (3) feet up from the bottom; this was completed about 4-6 weeks from the date of the inspection. Sandblasting grit and sludge from cleaning out of the tank were added to the solid waste stream.

The oil processing plant is located within an adjacent containment area and consists of a series of storage tanks, processing tanks and equipment for treating the oil. The oil is heated in two cookers (#100 and #107) to remove water. Water high in COD is sent to Cliff Berry (Miami) instead of the wastewater plant. The solids from the vibratory filter are stored in two 55-gallon drums which take about two months to fill before being transferred to tanks #110 or #111 located in the sludge separation area. The flash tower is still present, but not in use since Howco discontinued selling oil to the phosphate industry. The surface beneath the processing area has been coated since the last inspection in order to provide impervious secondary containment. An underground pipeline previously used for conveying oil/water mixture between the processing area and the wastewater pretreatment plant has been closed off by being blind flanged at both ends. The out of service line should be permanently closed by welding caps at both ends to prevent its use. The remaining underground pipelines currently in use were recently pressure tested for leaks by Norris and Samon Pump Service and all passed. In the oil storage area, four tanks (#121, #122, #123 and #124) are used to store processed oil prior to shipment. The secondary containment for this area has been completed.

In the sludge separation area, the sludge is treated in a heated tank and then a cone sludge separator to remove oil from the waste sludge. It was suggested to Mr. Roehm that the pipelines through which the sludge is discharge into the roll-off should be capped when not in use. This is to prevent possible discharge of waste from the tanks outside the containment wall, in the event of a valve failure. The sludge is sent to Chambers Waste Systems in Okeechobee.

Located on the pad is a filter crusher. At the time of the inspection the filter crusher was out of service since it was being raised in order to apply an impervious coating to the pad beneath the crusher. The

crusher is also being raised to a higher elevation to prevent any overflow of oil from the collection sump onto the pad. As a result of the filter crusher being out of service there were approximately forty-eight 55-gallon drums labeled "Used Oil Filters" stored on the pad. The crushed filters are sent to U.S. Foundry, Medley, Florida. Storm water is collected in an open trench which drains to the yard drain basin and then pumped through an underground pipe to an oil/water separator. This separator is underground with access only possible through a manhole. Mr. Roehm stated that the separator is cleaned out every night.

The vehicle maintenance area contained a parts washer that uses Howco Kleen as a solvent. Howco Kleen is a high flash point naphtha. Also present were two 55-gallon drums of naphtha for use in the laboratory. Both these drums were labeled and closed. One unlabeled 55-gallon drum of used oil filters was present along with two labeled 300-gallon drums of antifreeze for recycling. Only one shipment of antifreeze (5000 gallons) was made to U.S. Filter Recovery (Rockville, VA) for 1999. This facility recycles the antifreeze by recovering the glycols for reuse. Several unlicensed tanker trailers that were previously stored on the Howco site have since been removed.

Howco sells their processed oil as fuel to the following five (5) customers: Florida Power Corporation (St. Petersburg), Better Roads (Punta Gorda), Couch Construction (Tampa, Odessa, Clearwater), Ajax Paving (Punta Gorda) and Harper Brothers (Fort Myers). Processed oil is certified by Howco to be "on-spec". Each batch which constitutes a tank is sampled before shipment, a revised sampling methodology is still being worked out between Howco and the Department's permitting section. Approximately twenty-three (23) out-bound manifests were examined – about eight of these had no analyticals attached. It was also observed that the following parameters were consistently listed as As<1, Cd<2, Cr<5, Pb<100, Flashpoint >100 and PCB's<2 in all the analyticals inspected. A batch of ten analyticals were compared against lab test; inconsistencies were found in two out of the ten. The lab test for Batch No. 1263 listed Pb as 122 and Cr as 28, while the lab test for Batch No. 1269 listed Pb as 123. These values are greater than the requirements for "on-spec" oil. Subsequent to the inspection, Dave Roehm supplied a laboratory log that he stated documents that the reported high values were in error. The high values were reportedly copied from the wrong column of the log book onto the lab sheets. The lead concentration listed on the analytical sheets actually refers to the tank numbers #122 and #123. The value of 28 ppm chromium was stated to be erroneous, and was reportedly the lead value for batch #1263.

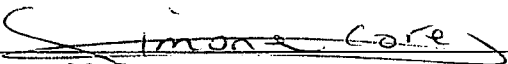
Approximately twenty-eight (28) manifests were examined for in-coming oil. Field screening of oil is done by drivers on each pick-up to ensure that the halogen level is below 1000 ppm, or 4000 pm based on the rebuttable presumption (CFR 279.53). Several loads were reported over 1000 ppm, but were documented to have included pick-ups from public collection facilities. All manifests showed the incoming oil to be below the acceptable halogen content. Sludge disposal records and annual report were also in order. Training records were examined for all the truck drivers. All the drivers were trained in hazardous waste operations and emergency response, as well as, hazardous material transportation.


10. Recommendations:

- a. The out-of-service pipeline that connects the pretreatment wastewater plant and the oil processing plant should be permanently capped-off via welding to prevent its use.

Howco Environmental Services
FLD 152 764 767

- b. Cap ends of pipelines through which sludge is discharged into roll-off, so as to prevent the soil directly beneath the pipelines from being contaminated.
- c. Label the 55-gallon drum of used oil filters found in the vehicle maintenance area as "Used Oil Filters".
- d. Ensure that all out-bound manifests have the appropriate analyticals attached.

Inspected: 
Simone M. Core
Environmental Specialist I

Approved:  Date: 10/1/95
Elizabeth B. Knauss
Environmental Manager

USED OIL TRANSPORTER CHECKLIST

Facility Name: HOWCO Environmental Services Date: September 17, 1999
Facility Representative: Mr. Dave Roehm Facility ID # FLD 152764767
Inspector: Randall STAUSS; Simone Core

40 CFR 279 Subpart E -- Transporter Standards

1. Is the facility exempt under any of the following? [279.40(a)] Y___ N ☒
- On site transport?
Generator transporting < 55 g /time to a collection center?
Transporter of < 55 g /time from generator to aggregation point owned by same generator?
2. If the transporter also transports hazardous waste in the same trucks as are used to transport used oil, are the vehicles emptied per 261.7 after HW shipments? (If not, the used oil must be managed as hazardous) N/A Y___ N___
3. Does the transporter process used oil incidental to transport? [279.41] Y___ N ☒
- Are any residues managed as used oil, reclaimed, or used as asphalt manufacture feedstock? N/A Y ☒ N___
- If not, has the transporter conducted a hazardous waste determination? [279.10(e)] N/A Y___ N___
4. Has the facility notified of used oil activities? Check EPA form 8700-12. Y ☒ N___
5. Does the transporter only deliver used oil to other transporters, oil processors, off specification used oil burners with EPA ID Numbers, or to on-specification oil burners? [279.43(a)] Y ☒ N___
6. Does the transporter comply with DOT requirements? [279.43(b)] Y ☒ N___
7. If any oil is discharged during transport, does the transporter: [279.43(c)]
- Notify National Response Center and State Warning Point and Coast Guard per 33 CFR 153.203, as applicable? Y ☒ N___
- Report to DOT in writing per 49 CFR 171.16? Y ☒ N___
- Clean up any discharges until the discharge poses no threat? Y ☒ N___
8. Does the facility also transport used oil filters? Y ☒ N___
- If so, are the filters stored in above ground containers which are: [62-710.850(6)]
- In good condition? Y ☒ N___
- Closed or otherwise protected from weather? Y ☒ N___
- Labeled "Used Oil Filters"? Y ☒ N___
- Stored on an oil impervious surface? In the process of being coated per consent order Y___ N ☒

Facility: Howe Environmental Services
Date: September 17, 1999

Transporter Recordkeeping -- 279.46

1. Do used oil acceptance records include: [279.46(a)]

Name & Address of facility providing the oil for transport?

Y ☒ N ☐

EPA ID # of oil provider (if applicable)?

Y ☒ N ☐

Quantity of oil shipped?

Y ☒ N ☐

Date of shipment?

Y ☒ N ☐

Signature of oil provider, dated upon receipt?

Y ☒ N ☐

2. Do used oil delivery records include: [279.46(b)]

Name & Address of receiving facility or transporter?

Y ☒ N ☐

EPA ID # of receiving facility or transporter?

Y ☒ N ☐

Quantity of oil delivered?

Y ☒ N ☐

Date of delivery?

Y ☒ N ☐

Signature of oil receiver, dated upon receipt?

Y ☒ N ☐

3. Do the above records also include state required information on the type of oil and destination or end use? [62-710.510(1)(c & e)]

Y ☒ N ☐

4. Does the facility keep records on DEP Form 62-701.900(13) or equivalent? [62-710.510(1)]

Y ☒ N ☐

5. Does the facility submit an annual report on DEP Form 62-701.900(14) by March 1 summarizing the on site records for the previous calendar year? [62-710.510(5)]

Y ☒ N ☐

If not, is the facility a generator who transport only their own used oil generated at their own non-contiguous operations to their own central collection facility for storage prior to having their used oil picked up by a certified used oil transporter?
[62-710.510(3)]

Y ☐ N ☐

7. Does the transporter keep copies of the record and reports for three years at the street address of the facility? [62-710.510(4)]

Y ☒ N ☐

8. Does the transporter sell to burners or claim that any oil meets the specification? If so, complete the USED OIL MARKETER checklist.

Y ☒ N ☐

Transporter Certification -- 62-710 F.A.C.

1. Is the transporter certified? (local governments, and < 55g/time transporters are exempt) [62-710.600]

Y ☒ N ☐

2. Does the facility maintain training records? [62-710.600(2)(c)]

Y ☒ N ☐

3. Does the facility maintain insurance or financial assurance of \$100,000 combined single limit? [62-710.600(2)(d)]

Y ☒ N ☐

4. Is the facility registration form and ID number displayed? [62-710.500(4)]

Y ☒ N ☐

Facility: Howe Environmental Services
Date: September 17, 1999

Transfer Facility Standards -- 279.45

- 1 Does the transporter store used oil at any transportation related facility (including parking lots) for more than 24 hours and not longer than 35 days during the normal course of transport? Transfer facilities storing used oil more than 35 days must comply with 279 Subpart F N/A Y ✓ N
- Is the transfer facility registered per 62-710.500(1)(a) F. A. C.? Y ✓ N
- 2 Does the transporter determine whether used oil stored at a transfer facility has a total halogen content above or below 1,000 ppm? Y ✓ N
- Is this done by testing? Y ✓ N
- Is this done by process knowledge? Describe basis in narrative. Y N ✓
- Are test records or copies of records providing basis for determination kept for 3 years? [279.44(d)] Y ✓ N
- 3 Have any analyses showed exceedances of the 1,000 ppm level? Y ✓ N
- If so, was the oil managed as hazardous waste? Y N ✓
- If not, was the oil exempt? Describe in narrative. N/A Y ✓ N
- 4 Is used oil stored only in tanks or containers? (Circle applicable units) Y ✓ N
- 5 If the facility has tanks, do they comply with 62-761 F. A. C. rules? (Describe in narrative, including number and size of tanks, noting registration numbers if applicable, and compliance status.) Y ✓ N
- Is secondary containment provided and adequate? Y ✓ N
- 6 Are containers, and tank trailers in good condition and not leaking? Y ✓ N
- 7 Are containers provided with secondary containment consisting of walls and floor at a minimum? Being corrected per consent order Y N ✓
- Is the containment system impervious to oil so as to prevent migration? Y N ✓
- 8 Are ASTs, UST tank fill lines and containers labeled "used oil? Y ✓ N
- 9 Are used oil filters stored more than 10 days? Y ✓ N
- If so, is the facility a registered used oil filter transfer facility? [62-710.850] N/A Y ✓ N
- 10 Does the facility stop operations and clean up releases of used oil, repairing or replacing any leaking units as applicable? Y ✓ N

USED OIL PROCESSOR CHECKLIST

Facility Name: HOWCO Environmental Service Date: September 17, 1999
Facility Representative: Mr. Dave Boehm Facility ID: FLD 152 764 767
Inspector: Randall Strauss & Simone Cori Registration # 59-261 3500

40 CFR 279 Subpart F -- Processor Standards

1. Is the facility exempt under any of the following? (279.50(a)) Y ☐ N ☒
Transporter or burner processing incidental to normal course of operations? Y ☐ N ☐
Processors who also generate, transport, market, dispose or burn used oil must comply with the applicable Subparts of Part 279.
2. Does the processor have an EPA ID Number? (279.51(a)) Y ☒ N ☐
3. Is the processor Registered? (62-710.500(1)(b)) Y ☒ N ☐
4. Does the processor have a general permit? 62-710.800(1)) Y ☒ N ☐
5. For new facilities, was the notification of intent to use the general permit submitted 30 days prior to beginning operation? For existing facilities, was "the notification for renewal submitted 30 days prior to expiration of the general permit?(62-710.800(2)) Y ☒ N ☐

Oil Filter Processing Standards-- 62-710.850 F.A.C.

1. Does the facility process used oil filters by removing oil, draining, crushing or element separation? Describe in narrative. Generators who process their own filters are not regulated provided the filters are not disposed of in a landfill but are managed by a registered processor. Y ☒ N ☐
Is the facility a registered used oil filter processor? (62-710.850) Y ☒ N ☐
2. Are the filters stored in above ground containers which are: (62-710.850(6))
In good condition? Y ☒ N ☐
Closed or otherwise protected from weather? Y ☒ N ☐
Labeled "Used Oil Filters"? Y ☒ N ☐
Stored on an oil impervious surface? In the process of being coated per consent order Y ☐ N ☒
3. Are records maintained on DEP Form 62-710.900(2) or equivalent that include: (62-710.850(5)(a))
Destination or end use of the processed filters? Y ☒ N ☐
Name and street address of each destination or end user? Y ☒ N ☐
Are copies kept at the facility's street address for 3 years? (62-710.850(5)(b)) Y ☒ N ☐
4. Is an Annual Report submitted by March 1 for the previous calendar year summarizing the above records? (62-710.850(5)(c)) Y ☒ N ☐

Oil Management Standards - 279.54

1. Is used oil stored only in tanks or containers? (Circle applicable units) Y ☒ N ☐

2. If the facility has tanks, do they comply with 62-761 F. A. C. rules?
(Applicable to USTs over 100 g and ASTs over 550 gallons. Describe in narrative, including number and size of tanks, noting registration numbers if applicable, and compliance status.) Y ☒ N ☐

Is secondary containment consisting of a floor and dike which are impervious to oil provided for ASTs? Applies to all ASTs regardless of size per 279.54(d & e) Y ☒ N ☐

3. Are containers and tanks in good condition and not leaking? (279.54(b)) Y ☒ N ☐

4. Are containers provided with secondary containment consisting of walls and floor at a minimum? (279.54(c)) being addressed per consent order Y ☐ N ☒

Is the containment system impervious to oil so as to prevent migration? Y ☐ N ☒

5. Are ASTs, UST tank fill lines and containers labeled "used oil"? (279.54(f)) Y ☐ N ☐

6. Does the facility stop operations and clean up releases of used oil, repairing or replacing any leaking units as applicable? (279.54(g)) Y ☐ N ☐

General Facility Standards - 279.52

1. Is the facility maintained and operated to prevent a fire, explosion or planned or unplanned release of used oil to the air, soil, or water which could threaten human health or the environment? (279.52(a)(1)) Y ☒ N ☐

2. Does the facility have an internal communication or alarm system capable of giving immediate emergency instruction to facility personnel? (279.52(a)) Y ☒ N ☐

3. Is there a telephone, alarm, 2-way radio or other device at the scene of operations immediately available and capable of summoning assistance from local fire departments? (279.52(a)(2)(ii)) Y ☒ N ☐

Is there immediate access to this equipment by all personnel who are engaged in pouring, mixing, spreading or otherwise handled, either directly or by voice or visual contact with another employee? (279.52(a)(4)) Y ☒ N ☐

4. Describe fire control equipment. Is it adequate? (279.52(a)(2)(iii)) Y ☒ N ☐

5. Is spill control and decontamination equipment present? (279.52(a)(2)(iii)) Y ☒ N ☐

6. If sprinklers, water hoses or foam producing equipment is part of the facility fire control equipment, is water available at adequate volume and pressure? (279.52(a)(2)(iii)) Y ☒ N ☐

7. Is the emergency equipment inspected and tested periodically?
Frequency? annually Y ☒ N ☐

8. Is there adequate aisle space to allow unobstructed movement of facility personnel and emergency equipment to any area of the facility where needed? (279.52(a)(5i)) Y ☒ N ☐
9. Has the facility made emergency response arrangements with the following: (279.52(a)(6))
- Fire Department: St. Petersburg Y ☒ N ☐
- Police: St. Petersburg Y ☒ N ☐
- Hospital: Bayfront Medical Centre Y ☒ N ☐
- Emergency Response Contractor: Facility is ER Contractor Y ☐ N ☐
10. If not, has the facility attempted to do so and is the refusal documented? Y ☐ N ☐

Contingency Plans and Emergency Response -- 279.52(b)

1. Does the facility have a contingency plan? Y ☒ N ☐
2. Is it at the facility and easily available? Y ☒ N ☐
3. Does the plan include:
- Fire Response Procedure: (compare to 279.52(b)(6)) N/A ☐ Y ☒ N ☐
- Spill Response Procedures: " N/A ☐ Y ☒ N ☐
- Explosion Response Procedures: " N/A ☐ Y ☒ N ☐
- Instructions for handling contaminated materials & residues Y ☒ N ☐
- A description of arrangements with local authorities: N/A ☐ Y ☒ N ☐
- Emergency Coordinators: (Name) Tim Morris Y ☒ N ☐
- Addresses and telephone numbers of Emergency Coordinators: Y ☒ N ☐
- Emergency equipment list: Y ☒ N ☐
- Specifications and capabilities of emergency equipment: Y ☒ N ☐
- Locations of emergency equipment: Y ☒ N ☐
- An evacuation plan and routes: Y ☒ N ☐
- Evacuation/alarm signals: Y ☒ N ☐
- External reporting procedures: Y ☒ N ☐
- Internal recordkeeping requirements: Y ☒ N ☐
4. Is the plan up to date, with no changes to the list of emergency equipment, list of emergency coordinators, applicable regulations or contingency plan failures since the last revision? (279.52(b)(4)) Y ☒ N ☐
5. Has the plan been distributed to the local police, fire department, ERT and hospital? Circle omitted authorities. (279.52(b)(3)) Y ☒ N ☐
6. Is the emergency coordinator authorized to commit funds for incident response? Y ☒ N ☐
7. Has the processor noted in the operating record any incidents requiring implementation of the contingency plan? (279.52(b)(6)(ix)) Y ☐ N ☒
9. Were written reports made within 15 days to the DEP? (279.52(b)(6)(ix)) Y ☐ N ☐

Rebuttable Presumption and Analysis Plan -- 279.53, 279.55

1. Does the processor have a written analysis plan to determine whether used oil stored at the facility has a total halogen content above or below 1,000 ppm and whether the facility's used oil fuel meets the used oil specification? (279.55)(a)) Y ☒ N ☐
2. Is the 1,000 ppm halogen determination made by testing? Y ☒ N ☐
If so, does the analysis plan cover: (279.55(a)(2))
Sampling methods? Y ☒ N ☐
Frequency of sampling? Y ☒ N ☐
Analytical Methods? Y ☒ N ☐
Is the 1,000 ppm halogen determination made by process knowledge? Y ☐ N ☒
If so, is the type of information that will be used to determine the halogen content stated in the analysis plan? (279.55(a)(3)) Y ☐ N ☐
3. Have any analyses showed exceedances of the 1,000 ppm level? Y ☒ N ☐
If so, was the oil managed as hazardous waste? Y ☐ N ☒
If not, was the oil exempt? Describe basis for presumption rebuttal in narrative. (ex. analysis, refrigerant oil, etc.) N/A ☐ Y ☒ N ☐
4. Is the used oil fuel specification determination made by testing? Y ☐ N ☐
If so, does the analysis plan cover: (279.55(b)(2))
Sampling methods? Y ☒ N ☐
Whether the oil will be tested before or after processing? Y ☒ N ☐
Frequency of sampling? Y ☒ N ☐
Analytical Methods? Y ☒ N ☐
Is the used oil fuel specification determination made by process knowledge? Y ☐ N ☒
If so, is the type of information that will be used to determine the halogen content stated in the analysis plan? (279.55(b)(3)) Y ☐ N ☐
5. Are all oil processing residues managed as used oil, reclaimed, or used as asphalt manufacture feedstock? (279.59) N/A ☐ Y ☒ N ☐
If not, has the processor conducted a hazardous waste determination? (279.10(e)) N/A ☐ Y ☐ N ☐
6. Are test records or copies of records providing basis for determinations kept for 3 years? (279.57(a)(2)(i)) Y ☒ N ☐

Recordkeeping and Reporting -- 279.57, 62-710.510-520 F.A.C.

1. Do used oil acceptance records include: (279.56(a))

Name & address of the generator or off site source of the used oil?	Y <input checked="" type="checkbox"/>	N <input type="checkbox"/>
EPA ID # of oil provider (if applicable)?	Y <input checked="" type="checkbox"/>	N <input type="checkbox"/>
Name & Address of the transporter delivering the oil to the facility?	Y <input checked="" type="checkbox"/>	N <input type="checkbox"/>
EPA ID # of the transporter delivering the oil	Y <input checked="" type="checkbox"/>	N <input type="checkbox"/>
Quantity of oil shipped?	Y <input checked="" type="checkbox"/>	N <input type="checkbox"/>
Type of oil received (62-710.510(1)(c))	Y <input checked="" type="checkbox"/>	N <input type="checkbox"/>
Date of shipment?	Y <input checked="" type="checkbox"/>	N <input type="checkbox"/>

2. Do used oil delivery records include: (279.56(b), also check marketer requirements)

Name & Address of receiving facility? (burner, processor or disposal site)	Y <input checked="" type="checkbox"/>	N <input type="checkbox"/>
EPA ID # of receiving facility?	Y <input checked="" type="checkbox"/>	N <input type="checkbox"/>
Name & Address of transporter delivering the oil?	Y <input checked="" type="checkbox"/>	N <input type="checkbox"/>
EPA ID # of transporter?	Y <input checked="" type="checkbox"/>	N <input type="checkbox"/>
Quantity of oil delivered?	Y <input checked="" type="checkbox"/>	N <input type="checkbox"/>
End Use of the oil? (62-710.510(1)(e))	Y <input checked="" type="checkbox"/>	N <input type="checkbox"/>
Date of delivery?	Y <input checked="" type="checkbox"/>	N <input type="checkbox"/>

3. Does the facility keep records on DEP Form 62-710.900(2) or equivalent? (62-710.501(1))

Y ☒ N ☐

4. Does the facility submit an annual report by March 1 summarizing the on site records for the previous calendar year? (62-710.520)

Y ☒ N ☐

If not, is the facility an electric utility processing only self generated used oil for recycling, which is exempt from state registration and reporting requirements? (62-710.530)?

Y ☐ N ☐

5. Does the transporter keep copies of the record and reports for three years at the street address of the facility? (62-710.510(2))

Y ☒ N ☐

Closure -- 62-710.800(3) F.A.C. and 279.54(h)

1. Has the facility submitted a written closure plan? (62-710.800(3)(a))

Y ☒ N ☐

2. Does the plan include procedures for removing containers of oil and residues?

Y ☒ N ☐

Cleaning and decontaminating tanks and ancillary equipment?

Y ☒ N ☐

Removing contaminated soils?

Y ☒ N ☐

Eliminating the need for further maintenance?

Y ☒ N ☐

If the facility operated tank systems, and not all contaminated soils can be practicably removed, the owner or operator must close the facility as a hazardous waste landfill.

USED OIL MARKETER CHECKLIST

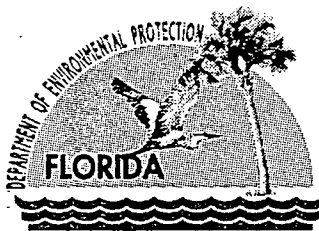
Facility Name: Howco Environmental Services Date: September 17, 1999
Facility Representative: Mr. Dave Roehm Facility ID #: FLD 152 764 767
Inspector: Randall Strauss Registration #: 59-2613500
Simone Rose

40 CFR 279 Subpart H -- Marketer Standards

1. Does the facility direct shipments of off-specification used oil to used oil burners? (except processors who burn incidentally) Y____ N ✓

Or does the facility first claim that used oil that is to be burned for energy recovery meets the used oil fuel specification Y ✓ N____
2. Check other Subparts the marketer complies with. (Must comply with at least one and have EPA ID #)
____ C - Generator ✓ E - Transporter ✓ F - Processor ____ G - Burner
3. Is the facility registered? (62-710.500(1)(c)) ____ N/A (Utility) Y ✓ N____
4. Does the marketer only send off specification oil to burners with EPA ID Numbers (279.71(a)) N/A ✓ Y____ N____
And approved Industrial Furnaces or Boilers(279.71(b)) Y____ N____
5. Does the marketer claim the used oil meets the specification by analysis? Y ✓ N____
Or by obtaining copies of generator performed analyses? (279.72(a)) Y____ N ✓
6. Does the marketer have copies of written and signed certifications from all off specification oil burners to which he has directed shipments stating that the burner: (279.75) N/A ✓

Has notified EPA of its used oil management activities? Y____ N____
Will only burn off spec oil in an approved device? Y____ N____
7. Do Off specification oil delivery records include: (279.74(a)) N/A ✓
Name & Address of transporter delivering oil? Y____ N____
EPA ID # of transporter? Y____ N____
Name & Address of receiving burner? Y____ N____
EPA ID # of receiving burner? Y____ N____
Quantity of oil shipped? Y____ N____
Date of shipment? Y____ N____
8. Do on specification oil delivery records include: (279.74(b)) N/A____
Name & Address of receiving facility? Y ✓ N____
Cross reference to analysis or other information used to determine that the oil meets the specification? Y ✓ N____
Quantity of oil shipped? Y ✓ N____
Date of shipment? Y ✓ N____
9. Does the marketer keep copies of records for three years? (279.72(b)) Y ✓ N____
10. Does the facility maintain records on DEP Form 62-710.900(2), including type of oil and destination or end use? Y ✓ N____
11. Does the facility submit annual reports by March 1? Y ✓ N____



Jeb Bush
Governor

Department of Environmental Protection

Southwest District
3804 Coconut Palm Drive
Tampa, Florida 33619

David B. Struhs
Secretary

SITE INSPECTION REPORT

OWNER/OPERATOR: Mr. David J. Roehm (HOWCO)
MAILING ADDRESS: 3701 Central Ave.
St. Petersburg, Fl. 33713

NAME OF SITE: HOWCO Used Oil Processing Facility
SITE ADDRESS: same as above
CITY: St. Petersburg, Fl.

INSPECTION

DATE: June 3, 1999

PERMIT NO: pending

REASON FOR VISIT:

- COMPLIANCE INSPECTION X
- PERMITTING INSPECTION X
- COMPLAINT INVESTIGATION

PERSONS PRESENT: Susan Pelz, Al Gephart (FDEP), David Roehm, Tim Hagan (HOWCO)

SUMMARY REPORT: The purpose of this site visit was to assess the activities at the site with respect to the applicability of solid waste permitting.

Mr. Roehm and Mr. Hagan accompanied us throughout the site inspection. (See Site Inspection Report dated January 9, 1998 for general description of the site.)

We observed the ongoing modifications to the used oil processing facility. Several tanks were being elevated to allow for better housekeeping, and a secondary containment structure was being built around the tanks.

We proceeded to the south part of the facility where we observed the filter crushing operation, and the drum crusher. Mr. Hagan indicated that the drum crusher would be used to crush oily wastes such as booms and pads. After additional discussion, it was concluded that the only "absorbent materials" which are proposed to be crushed in the drum crusher are booms and pads (i.e. not granular absorbents). I indicated that this information needs to be clarified in the Solid Waste Processing portion (Section 5) of the used oil processing facility permit application, and that the Department would probably want to see a demonstration of this proposed activity prior to authorizing it in the permit.

We then went to the southwest corner of the site. We observed several drums, a roll-off with one side cut out, the cone separator tank, the "oily waste batch treatment tank," and one other (vertical) tank. Upon inspection, the majority of the drums were labeled "used oil" or "oil filters." However, one drum was labeled "sludge" and "trash." I opened this drum and it contained a bag of trash, several oil containers and what appeared to be an oily sludge. We discussed the operation of the "oily solids batch treatment tank" (OSBTT) with respect to the materials found in this drum.

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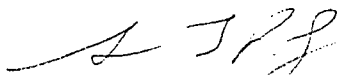
The OSBTT has a 4-6 inch infed pipe which will be fed by a vac truck suction line. The materials are "blown" into the tank which is an inclined horizontal tank. The incline reportedly will allow the oily liquids to rise to the top and be removed for processing in or at the used oil processing facility, while the solids accumulated at the bottom are discharged by "rapping" the tank, through a 12-inch pipe into a roll-off for off-site disposal. It did not appear that this system could physically accommodate the bag of trash and oil containers (which were greater than 4-6 inch diameter) which were discovered in the drum. We discussed this at great length, and it was concluded that bags of "trash" and other large debris would not be placed in the OSBTT, but would be removed from the drums before processing in the OSBTT. At the conclusion of the site visit we discussed this issue again, and I indicated that "trash" or other materials which cannot (or will not) be processed through the used oil processing facility shall not be accepted at the facility. The Department recognizes that small quantities of incidental solid wastes may be received, but the facility shall not accept materials which are clearly "trash" or other solid wastes without a solid waste permit. Another issue concerning the OSBTT was that the discharge pipe extends beyond the secondary containment wall. Al indicated that he would discuss this with Randy Strauss of our office.

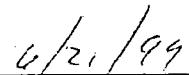
Mr. Hagan then inquired about the possibility of processing used absorbents in a screened hopper. He proposed to place the used absorbents in the hopper and add water to release the oil for processing, and then combine the remaining solids with the other solids produced from the used oil processing. I indicated that as long as the materials are processed in the used oil processing facility (i.e. used oil is recovered from them) and are therefore covered under the used oil permit, a solid waste permit would not be required. However, I did express my skepticism about the feasibility of adding water to absorbents (such as "kitty litter") to release an insignificant quantity of oil, and then having to "dry" these materials out again to allow for landfill acceptance. I indicated that the Department would probably want to see a demonstration of this proposed activity prior to authorizing it in the permit.

We concluded our inspection in the office at the site. We again discussed the activities which would require a solid waste permit. Although Mr. Hagan proposed to manage "petroleum contaminated" wastes at the site, Al pointed out that only used oil contaminated wastes are allowed to be managed in the used oil processing facility. The management of wastes which are contaminated with petroleum products other than used oil will not be authorized by the used oil processing facility permit, and will require a solid waste permit. Additionally, the management of used oil contaminated materials which cannot or will not be processed to remove the used oil will not be authorized by the used oil processing facility permit, and will require a separate solid waste permit.

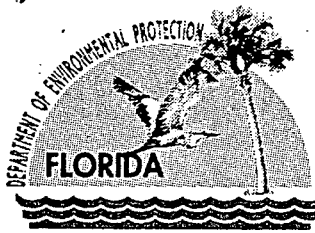
RECOMMENDATIONS: With the exception of the one drum with "trash" and sludge, the facility did not appear to have unauthorized solid wastes at the time of our visit. The facility operator should continue to accept only used oil, oil filters and used oil contaminated materials from which used oil can or will be recovered. Management of any other material is not authorized, at this time.

FDEP REPRESENTATIVE:


Susan J. Pelz, P.E. Solid Waste Section


Date Mailed to Facility

cc: Deb Bush, Pinellas County, 3095 - 114th Ave. N., St. Petersburg, Fl. 33716
Al Gephart/Roger Evans, RCRA- FDEP Tampa
Randy Strauss, RCRA- FDEP Tampa
Robert Butera, P.E., Solid Waste- FDEP Tampa



Jeb Bush
Governor

Department of Environmental Protection

Southwest District
3804 Coconut Palm Drive
Tampa, Florida 33619

David B. Struhs
Secretary

June 24, 1999

Mr. Tim Hagan
Howco Environmental Services
3701 Central Ave.
St. Petersburg, FL 33713

Re: Howco Environmental Services EPA ID# FLD 152 764 767
843 43rd Street South
St. Petersburg, FL

Dear Mr. Hagan:

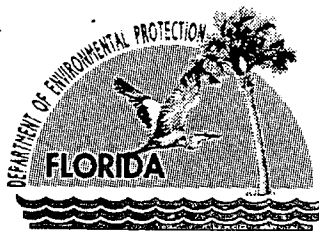
Thank you for your assistance during the Resource Conservation and Recovery Act (RCRA) compliance inspection conducted of the above facility on September 29, 1998. Enclosed is the inspection report generated from this visit. The violations that are cited in the report are addressed in the Consent Order (OGC #97-2190) that you recently entered into with the Department. As described in Section 11 of the report, Howco will be considered to be in compliance with respect to these citations, provided you maintain compliance with the terms of the Consent Order.

If you have any questions, please call me at (813)744-6100, extension 387.

Sincerely,

Randall H. Strauss
Environmental Specialist II
Division of Waste Management

cc: Susan Pelz, SWD Solid Waste
Morgan Leibrandt, HWR
Charlie Ryburn, Pinellas Co. DEM
Ernest Roggelin, Pinellas Co. DOH



Jeb Bush
Governor

Department of Environmental Protection

Southwest District
3804 Coconut Palm Drive
Tampa, Florida 33619

David B. Struhs
Secretary

HAZARDOUS WASTE INSPECTION REPORT

1. **INSPECTION TYPE:** ☒ Routine ☐ Complaint ☐ Permitting ☐ Follow-Up ☐ Pre-Arranged

FACILITY NAME Howco Environmental Services EPA ID # FLD 152 764 767

STREET ADDRESS 843 43rd Street South, St. Petersburg, FL 33711

MAILING ADDRESS 3701 Central Ave., St. Petersburg, FL 33713

COUNTY Pinellas PHONE 727/327-8467 DATE 9/29/98 TIME 9:00 a.m.

NOTIFIED AS:

- ☐ Non Handler
- ☐ CESQG (<100 kg/mo.)
- ☐ SQG (100-1000 kg/mo.)
- ☐ Generator (>1000 kg/mo.)
- ☐ Transporter
- ☐ Transfer Facility
- ☐ Interim Status TSD Facility
- ☐ TSD Facility
- ☐ Unit Type(s):
- ☐ Exempt Treatment Facility
- ☒ Used Oil:

CURRENT STATUS:

- ☐ Non Handler
- ☐ CESQG (<100 kg/mo.)
- ☐ SQG (100-1000 kg/mo.)
- ☐ Generator (>1000 kg/mo.)
- ☐ Transporter
- ☐ Transfer Facility
- ☐ Interim Status TSD Facility
- ☐ TSD Facility
- ☐ Unit Type(s):
- ☐ Exempt Treatment Facility
- ☒ Used Oil:

2. **APPLICABLE REGULATIONS:**

- | | | | |
|--|---|--------------------------------------|---|
| <input type="checkbox"/> 40 CFR 261.5 | <input type="checkbox"/> 40 CFR 262 | <input type="checkbox"/> 40 CFR 263 | <input type="checkbox"/> 40 CFR 264 |
| <input type="checkbox"/> 40 CFR 265 | <input type="checkbox"/> 40 CFR 266 | <input type="checkbox"/> 40 CFR 268 | <input type="checkbox"/> 40 CFR 273 |
| <input checked="" type="checkbox"/> 40 CFR 279 | <input checked="" type="checkbox"/> 62-710, FAC | <input type="checkbox"/> 62-737, FAC | <input checked="" type="checkbox"/> 62-740, FAC |

3. **RESPONSIBLE OFFICIAL(s):**

Tim Hagan, Owner

John Lurie, Chief Financial Officer

4. **INSPECTION PARTICIPANTS:**

Tim Hagan & John Lurie, Howco

Randall Strauss & Ray Magsanoc, FDEP

5. **LATITUDE/LONGITUDE** 27° 54' 00" 82° 38' 11"

6. **SIC Code:** 2999, 4953

7. **TYPE OF OWNERSHIP:** Private Federal State County Municipal

8. **PERMIT #:** N/A **ISSUE DATE:** **EXP. DATE:**

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Printed on recycled paper.

9. Facility Description:

Howco is a used oil transporter, processor and marketer. The facility also picks-up used oil filters, used anti-freeze, non-hazardous solid waste, industrial wastewater, and petroleum contact water (PCW) for processing and disposal. All oil is processed and marketed as "on-spec" to various burners, primarily asphalt plants. The ultimate disposal of other waste is either through a permitted discharge to the St. Petersburg POTW or to off-site disposal facilities. The business operates about six recovery trucks out of this location for used oil pick-up and other waste pumping services, e.g., from oil/water separators, car and truck wash pits and trenches, etc. Oil and waste from recovery trucks that service the Ft. Myers area are also processed and/or disposed at this facility. In addition, excess volume from a used oil transfer facility that Howco owns in Ocala is transported to this location for processing. The facility operates a chemical analytical laboratory that performs analyses supporting their own processing operations, and also provides analytical services for a fee, primarily for customer used oil and solid waste characterizations. The facility was last inspected by the Department for compliance with waste management requirements in October 1996.

The physical description of the used oil and wastewater processing plants is the same as from previous inspections, with the exception of containment area #2, where Tanks #121 through #129 were previously located. At the time of inspection, the secondary containment for this area was being upgraded. The tanks had been temporarily removed from the north half of the containment and half of a new concrete block and slab containment structure has been constructed. The next step planned at the time of inspection was to reinstall the storage tanks in the upgraded portion of the containment and place them back in service. Then the tanks will be removed from the south half of the area so the remaining portion of the containment can be completed and joined with the north half. Tim Hagan, the facility owner, estimated this area would be completed by the end of the year. The next planned upgrade will be steam cleaning, repairing cracks and coating the containment area for the oil processing plant, followed by the containment areas for the wastewater treatment plant. Mr. Hagan was unsure when the other upgrades would be completed, other than to say it would be before the end of 1999. The failure to complete the upgrade of these containment areas to be impervious are continuing violations of **40 CFR 279.54(d)**, which was cited as a result of the October 1996 inspection. In addition, there are two other tanks and a container that have not been provided with any form of secondary containment: a 3000-gallon tank which stores used oil generated from a filter crushing operation, a roll-off containing crushed oil filters and used oil, and a cone separator tank used to separate used oil from waste sludge—violations of **40 CFR 279.54(c) & (d)**. At the time of inspection, a process tank for the separation of used oil from waste sludge was being fabricated, but was not yet completed and in service. This tank should not be put in service unless it is provided with secondary containment meeting the requirements of **40 CFR 279.54(d)** and **62-762.500(6)**, F.A.C.

A processing change that has been made since the prior inspection is the discontinuation of the use of a distillation flash tower as part of the oil processing. Mr. Hagan said that this process was done only to remove light ends from the processed oil to meet a specification of the phosphate industry for oil used in beneficiation. He said that Howco discontinued selling oil to the phosphate industry for use in beneficiation at least a year ago, so the procedure has not been necessary.

There are several runs of underground piping at the facility including between the truck wash sump and a tank in the wastewater containment area, between the oil and wastewater plants, and from the wastewater plant to a sludge storage tank that feeds a filter press. This piping typically is used to convey used oil or mixtures of used oil and water. There are no records of monthly leak detection monitoring performed in accordance with **62-762.600**, F.A.C., on this piping, a violation of **62.710.800(5)**, F.A.C. The piping is reported to be of steel construction with a slightly greater than 3" internal diameter(ID), and if so meets the new definition of "bulk product piping" of **62-761**, F.A.C.

Mr. Hagan reported that the exact ID of the piping was determined by asking his supplier for the specification of the standard 3" steel piping that the facility normally purchases. However, there is no documentation that this is the actual piping installed, as there are no records or drawings related to the installations, and facility personnel are not sure when the various piping runs were installed. Some type of verifiable documentation should be developed if the facility desires to comply with bulk product piping standards.

An open trench collects drainage of stormwater and used oil from several tanks and process operations located on a pad along the southern perimeter of the facility. The trench was in use to convey used oil and oily wastewater from the following tanks and operations at the time of inspection: 1) used oil was draining into the trench through a hose from a roll-off containing crushed oil filters, 2) oily wastewater was draining into the trench from the filter press, 3) oily wastewater was draining through a hose to the trench from a drum-washing rack. Liquids in the trench drain to a collection sump and from there are pumped through an underground pipe to a tank located in the wastewater containment area in which oil/water gravity separation takes place, which is followed by further processing of the separated phases. There are no records, nor is a method provided, for monthly leak detection monitoring performed on the trench, an additional violation of **62-710.800(5), F.A.C.** Howco has maintained in the past that the drainage trench and sump system provides secondary containment for the storage tanks and processes located on the pad that drains to the system. However, since the trench and sump system is routinely used for the conveyance of wastes, it can not simultaneously function as secondary containment.

The used oil filter crushing operation has been modified from the description in the previous report, so that filters are managed in containers throughout the entire process. Mr. Hagan estimated that about 20,000 pounds a week of crushed scrap steel filters are sent to U.S. Foundry, Medley, FL. It was also reported that the bulk solid waste/soil pile operation is in the process of being modified. An additional process is being added to thermally treat and separate used oil from waste sludge in a heated process tank. This is to be used in conjunction with the existing cone sludge separator for the management of oil-containing sludge. The recovered oil from these two operations will be routed to the oil processing plant. The remaining solid waste sludge and residues will be mixed with clean soil, which acts as an absorbent, within the confines of a waste roll-off that has been modified for better access by cutting-out one side of the container. The mixture will be placed in a covered roll-off for storage prior to disposal off-site. Waste materials received from off-site that will be managed in this manner include oil-absorbent pads and booms, oil/water separator sludge; sludge from the clean-out of sumps and trenches from automotive repair businesses, truck and car washes, and stormwater treatment and control structures; and other non-hazardous sludge, or sludge that contains recoverable oil. In addition, several solid waste streams generated by the facility are managed and disposed in this manner. These include vibratory screen filter solids, filter press sludge, used absorbent pads and booms, and spent sand and carbon from wastewater treatment filters. Howco reported that it changes-out the sand and carbon filters about once a year, but has never performed a hazardous waste determination on these materials, a repeat violation from the October 1996 inspection of **40 CFR 262.11**.

At the time of inspection, there was an estimated 10 cubic yard pile of soil covered with a tarp located on the pad in the southwest corner of the facility. Mr. Hagan reported that it was clean soil that would be used for mixing with sludge residues, as described above. He reported that no waste sludge/soil mixture was stored on-site at the time. He said that any mixing would be done in the modified roll-off and then transferred to the covered roll-off for storage prior to disposal off-site. Recently this waste has been disposed to Chambers Waste Systems, Okeechobee, and also in the past to Geologic Recovery Systems, Mulberry. Receipts indicate that over the past year disposal of this waste to Chambers has ranged from about 60 to 90 tons per month (~3 to 4 semi-trailers). Shipments to Chambers were transported by People Automotive & Truck, Inc., St. Petersburg, on the following dates in the amounts

indicated: 2/11/98, 82 tons; 3/13/98, 59.6 tons; 3/25/98, 87 tons; 4/30/98, 92 tons. There are no waste analyses available for these shipments, a violation of **40 CFR 262.11**.

Records were reviewed for shipment of material to Geologic Systems identified as "petroleum contaminated soil." Although specific loads of this material have been analyzed in the past, there are no analyses available for the following shipments transported by Mega Force Construction, Clearwater, which are identified as "petroleum contaminated soil": 7/31/96, 249.6 tons; 9/9/96, 183.7 tons; 11/12/96, 85.4 tons; 1/28/97, 260.6 tons; 3/19/97, 218.1 tons. There is no way of determining whether this material actually meets the Chapter 62-775, F.A.C., definition of "petroleum contaminated soil," because there is no documentation establishing the original generators or the waste included in each load, a violation of **40 CFR 262.11**.

Processed oil is all certified by Howco to be "on-spec." The oil is marketed as fuel primarily to asphalt plants including Harper Brothers Plant #4, Ft. Myers; Couch Construction plants in Tampa, Odessa and Clearwater; and Ajax Paving Plants in Palmetto and Punta Gorda. Analytical results were available for outgoing oil, which is sampled and analyzed as described in the previous inspection report. A revised sampling methodology for outgoing oil will be specified in the analysis plan of Howco's Used Oil Processor Permit, which is currently under review by DEP Southwest District permit engineers.

Used anti-freeze is collected and stored in Tank #170, an approximate 10,000-gallon tank located in the oil processing containment area. Howco has been dealing through a broker since April 1998, American Chemical Exchange, Pasadena, CA, who arranges for recycling of the anti-freeze. Up to the time of inspection, about 31,000 gallons had been sent for recovery of glycol to U.S. Filter, Rockville, VA. Anti-freeze that is not acceptable for reclaim due to low glycol value is either treated in Howco's wastewater plant, or sent for disposal to Cliff Berry, Ft. Lauderdale, FL. Howco states that only non-hazardous anti-freeze is picked-up and all used anti-freeze customers are required to have a waste determination on file that is renewed annually.

Industrial wastewater and PCW is treated by lime, chemical oxidation, air stripping and carbon filtration prior to discharge to the St. Petersburg POTW. The facility maintains an industrial pre-treatment permit with the city and is regularly inspected by the pre-treatment program.

The following out-of service tanker trailers were stored at the facility: Nos 301, 302, 333, 906 and a 12,000-gal unlabeled trailer. All were empty and Mr. Hagan was advised that they must be provided with secondary containment if used to store used oil.


Driver training and tank inspection records appear well maintained and complete. The 1997 and 1998 Used Oil Annual Reports incorrectly list the disposition of outgoing oil as "Marketed for an industrial process," rather than the correct designation, "Marketed as an on-specification used oil fuel."

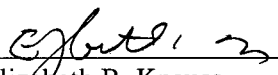
10. Summary of Alleged Violations:

40 CFR 262.11	Failure to determine if solid waste meets the definition of hazardous waste.
40 CFR 279.54(c)	Failure to provide impervious secondary containment for used oil containers.
40 CFR 279.54(d)	Failure to provide impervious secondary containment for used oil tanks.
62-710.800(5), F.A.C.	Failure to maintain release detection monitoring records for used oil piping.

11. Recommended Corrective Actions:

The Department entered into a Consent Order with Howco that was executed June 16, 1999, which addresses the alleged violations cited in this report. All actions that are required of Howco to correct the alleged violations have been incorporated into the Consent Order. Howco will be considered in compliance with respect to these citations providing it complies with the terms of the Consent Order.

Inspected: 
Randall H. Strauss
Environmental Specialist II

Approved:  Date: 6/24/99
Elizabeth B. Knauss
Environmental Manager

USED OIL TRANSPORTER CHECKLIST

Facility Name: Howco Environmental Services Date: September 29, 1998
Facility Representative: Tim Hagan Facility ID # FD 152 764 767
Inspector: R. Strauss

40 CFR 279 Subpart E -- Transporter Standards

1. Is the facility exempt under any of the following? [279.40(a)] Y____ N ☒
- On site transport?
Generator transporting < 55 g /time to a collection center?
Transporter of < 55 g /time from generator to aggregation point owned by same generator?
2. If the transporter also transports hazardous waste in the same trucks as are used to transport used oil, are the vehicles emptied per 261.7 after HW shipments? (If not, the used oil must be managed as hazardous) N/A Y____ N____
3. Does the transporter process used oil incidental to transport? [279.41] Y____ N ☒
- Are any residues managed as used oil, reclaimed, or used as asphalt manufacture feedstock? N/A Y____ N____
- If not, has the transporter conducted a hazardous waste determination? [279.10(e)] N/A Y____ N____
4. Has the facility notified of used oil activities? Check EPA form 8700-12. Y ☒ N____
5. Does the transporter only deliver used oil to other transporters, oil processors, off specification used oil burners with EPA ID Numbers, or to on-specification oil burners? [279.43(a)] Y ☒ N____
6. Does the transporter comply with DOT requirements? [279.43(b)] Y ☒ N____
7. If any oil is discharged during transport, does the transporter: [279.43(c)]
- Notify National Response Center and State Warning Point and Coast Guard per 33 CFR 153.203, as applicable? Y ☒ N____
- Report to DOT in writing per 49 CFR 171.16? Y ☒ N____
- Clean up any discharges until the discharge poses no threat? Y ☒ N____
8. Does the facility also transport used oil filters? Y ☒ N____
- If so, are the filters stored in above ground containers which are: [62-710.850(6)]
- In good condition? Y ☒ N____
- Closed or otherwise protected from weather? Y ☒ N____
- Labeled "Used Oil Filters"? Y ☒ N____
- Stored on an oil impervious surface? Y____ N ☒

Facility: Howco Environmental Services
Date: September 29, 1998

Transporter Recordkeeping -- 279.46

1. Do used oil acceptance records include: [279.46(a)]

Name & Address of facility providing the oil for transport?

Y ☒ N ☐

EPA ID # of oil provider (if applicable)?

Y ☒ N ☐

Quantity of oil shipped?

Y ☒ N ☐

Date of shipment?

Y ☒ N ☐

Signature of oil provider, dated upon receipt?

Y ☒ N ☐

2. Do used oil delivery records include: [279.46(b)]

Name & Address of receiving facility or transporter?

Y ☒ N ☐

EPA ID # of receiving facility or transporter?

Y ☒ N ☐

Quantity of oil delivered?

Y ☒ N ☐

Date of delivery?

Y ☒ N ☐

Signature of oil receiver, dated upon receipt?

Y ☒ N ☐

3. Do the above records also include state required information on the type of oil and destination or end use? [62-710.510(1)(c & e)]

Y ☒ N ☐

4. Does the facility keep records on DEP Form 62-701.900(13) or equivalent? [62-710.510(1)]

Y ☒ N ☐

5. Does the facility submit an annual report on DEP Form 62-701.900(14) by March 1 summarizing the on site records for the previous calendar year? [62-710.510(5)]

Y ☒ N ☐

If not, is the facility a generator who transport only their own used oil generated at their own non-contiguous operations to their own central collection facility for storage prior to having their used oil picked up by a certified used oil transporter? [62-710.510(3)]

Y ☐ N ☐

7. Does the transporter keep copies of the record and reports for three years at the street address of the facility? [62-710.510(4)]

Y ☒ N ☐

8. Does the transporter sell to burners or claim that any oil meets the specification? If so, complete the USED OIL MARKETER checklist.

Y ☒ N ☐

Transporter Certification -- 62-710 F.A.C.

1. Is the transporter certified? (local governments, and < 55g/time transporters are exempt) [62-710.600]

Y ☒ N ☐

2. Does the facility maintain training records? [62-710.600(2)(c)]

Y ☒ N ☐

3. Does the facility maintain insurance or financial assurance of \$100,000 combined single limit? [62-710.600(2)(d)]

Y ☒ N ☐

4. Is the facility registration form and ID number displayed? [62-710.500(4)]

Y ☒ N ☐

Facility: Howco Environmental Services
Date: September 29, 1998

Transfer Facility Standards -- 279.45

- 1 Does the transporter store used oil at any transportation related facility (including parking lots) for more than 24 hours and not longer than 35 days during the normal course of transport? Transfer facilities storing used oil more than 35 days must comply with 279 Subpart F

N/A ☐ Y ☒ N ☐

Is the transfer facility registered per 62-710.500(1)(a) F. A. C.?

Y ☒ N ☐

- 2 Does the transporter determine whether used oil stored at a transfer facility has a total halogen content above or below 1,000 ppm?

Y ☒ N ☐

Is this done by testing?

Y ☒ N ☐

Is this done by process knowledge? Describe basis in narrative.

Y ☐ N ☐

Are test records or copies of records providing basis for determination kept for 3 years? [279.44(d)]

Y ☒ N ☐

- 3 Have any analyses showed exceedances of the 1,000 ppm level?

Y ☐ N ☒

If so, was the oil managed as hazardous waste?

Y ☐ N ☐

If not, was the oil exempt? Describe in narrative.

N/A ☐ Y ☐ N ☐

- 4 Is used oil stored only in tanks or containers? (Circle applicable units)

Y ☒ N ☐

- 5 If the facility has tanks, do they comply with 62-761 F. A. C. rules? (Describe in narrative, including number and size of tanks, noting registration numbers if applicable, and compliance status.)

Y ☐ N ☒

Is secondary containment provided and adequate?

Y ☐ N ☒

- 6 Are containers, and tank trailers in good condition and not leaking?

Y ☒ N ☐

- 7 Are containers provided with secondary containment consisting of walls and floor at a minimum?

Y ☐ N ☒

Is the containment system impervious to oil so as to prevent migration?

Y ☐ N ☒

- 8 Are ASTs, UST tank fill lines and containers labeled "used oil?"

Y ☒ N ☐

- 9 Are used oil filters stored more than 10 days?

If so, is the facility a registered used oil filter transfer facility? [62-710.850] N/A ☐ Y ☒ N ☐

- 10 Does the facility stop operations and clean up releases of used oil, repairing or replacing any leaking units as applicable?

Y ☒ N ☐

USED OIL PROCESSOR CHECKLIST

Facility Name: Howco Environmental Services Date: September 29, 1998
Facility Representative: Tim Hagan Facility ID: FLD 152 764 767
Inspector: R. Strass Registration #: _____

40 CFR 279 Subpart F -- Processor Standards

1. Is the facility exempt under any of the following? (279.50(a)) Y _____ N ✓
Transporter or burner processing incidental to normal course of operations? Y _____ N _____
Processors who also generate, transport, market, dispose or burn used oil must comply with the applicable Subparts of Part 279.
2. Does the processor have an EPA ID Number? (279.51(a)) Y ✓ N _____
3. Is the processor Registered? (62-710.500(1)(b)) Y ✓ N _____
4. Does the processor have a general permit? 62-710.800(1) No Processor Permit in Review Y _____ N ✓
5. For new facilities, was the notification of intent to use the general permit submitted 30 days prior to beginning operation? For existing facilities, was the notification for renewal submitted 30 days prior to expiration of the general permit? (62-710.800(2)) Y _____ N _____

Oil Filter Processing Standards-- 62-710.850 F.A.C.

1. Does the facility process used oil filters by removing oil, draining, crushing or element separation? Describe in narrative. Generators who process their own filters are not regulated provided the filters are not disposed of in a landfill but are managed by a registered processor. Y ✓ N _____
Is the facility a registered used oil filter processor? (62-710.850) Y ✓ N _____
2. Are the filters stored in above ground containers which are: (62-710.850(6))
In good condition? Y ✓ N _____
Closed or otherwise protected from weather? Y ✓ N _____
Labeled "Used Oil Filters"? Y ✓ N _____
Stored on an oil impervious surface? Y _____ N ✓
3. Are records maintained on DEP Form 62-710.900(2) or equivalent that include: (62-710.850(5)(a))
Destination or end use of the processed filters? Y ✓ N _____
Name and street address of each destination or end user? Y ✓ N _____
Are copies kept at the facility's street address for 3 years? (62-710.850(5)(b)) Y ✓ N _____
4. Is an Annual Report submitted by March 1 for the previous calendar year summarizing the above records? (62-710.850(5)(c)) Y ✓ N _____

Oil Management Standards - 279.54

1. Is used oil stored only in tanks or containers? (Circle applicable units) Y ☒ N ☐
2. If the facility has tanks, do they comply with 62-761 F. A. C. rules?
(Applicable to USTs over 100 g and ASTs over 550 gallons. Describe in
narrative, including number and size of tanks, noting registration numbers
if applicable, and compliance status.) Y ☐ N ☒
- Is secondary containment consisting of a floor and dike which are
impervious to oil provided for ASTs? Applies to all ASTs regardless
of size per 279.54(d & e) Y ☐ N ☒
3. Are containers and tanks in good condition and not leaking? (279.54(b)) Y ☒ N ☐
4. Are containers provided with secondary containment consisting of walls
and floor at a minimum? (279.54(c)) Y ☐ N ☒
- Is the containment system impervious to oil so as to prevent migration? Y ☐ N ☒
5. Are ASTs, UST tank fill lines and containers labeled "used oil"? (279.54(f)) Y ☒ N ☐
6. Does the facility stop operations and clean up releases of used oil, repairing
or replacing any leaking units as applicable? (279.54(g)) Y ☒ N ☐

General Facility Standards - 279.52

1. Is the facility maintained and operated to prevent a fire, explosion or
planned or unplanned release of used oil to the air, soil, or water which
could threaten human health or the environment? (279.52(a)(1)) Y ☒ N ☐
2. Does the facility have an internal communication or alarm system capable
of giving immediate emergency instruction to facility personnel? (279.52(a)) Y ☒ N ☐
3. Is there a telephone, alarm, 2-way radio or other device at the scene of
operations immediately available and capable of summoning
assistance from local fire departments? (279.52(a)(2)(ii)) Y ☒ N ☐
- Is there immediate access to this equipment by all personnel who are engaged
in pouring, mixing, spreading or otherwise handled, either directly or by
voice or visual contact with another employee? (279.52(a)(4)) Y ☒ N ☐
4. Describe fire control equipment. Is it adequate? (279.52(a)(2)(iii)) Y ☒ N ☐
5. Is spill control and decontamination equipment present? (279.52(a)(2)(iii)) Y ☒ N ☐
6. If sprinklers, water hoses or foam producing equipment is part of the facility
fire control equipment, is water available at adequate volume and
pressure? (279.52(a)(2)(iii)) Y ☒ N ☐
7. Is the emergency equipment inspected and tested periodically?
Frequency? annual Y ☒ N ☐

Date: September 29, 1998

10. If not, has the facility attempted to do so and is the refusal documented? Y_____N_____

Contingency Plans and Emergency Response -- 279.52(b)

9. Were written reports made within 15 days to the DEP? (279.52(b)(6)(ix)) Y_____N_____

Rebuttable Presumption and Analysis Plan -- 279.53, 279.55

1. Does the processor have a written analysis plan to determine whether used oil stored at the facility has a total halogen content above or below 1,000 ppm and whether the facility's used oil fuel meets the used oil specification? (279.55)(a)) Y ☒ N ☐
2. Is the 1,000 ppm halogen determination made by testing? Y ☒ N ☐
If so, does the analysis plan cover: (279.55(a)(2))
Sampling methods? Y ☒ N ☐
Frequency of sampling? Y ☒ N ☐
Analytical Methods? Y ☒ N ☐
Is the 1,000 ppm halogen determination made by process knowledge? Y ☐ N ☒
If so, is the type of information that will be used to determine the halogen content stated in the analysis plan? (279.55(a)(3)) Y ☐ N ☐
3. Have any analyses showed exceedances of the 1,000 ppm level? Y ☐ N ☒
If so, was the oil managed as hazardous waste? Y ☐ N ☐
If not, was the oil exempt? Describe basis for presumption rebuttal in narrative. (ex. analysis, refrigerant oil, etc.) N/A ☐ Y ☐ N ☐
4. Is the used oil fuel specification determination made by testing?
If so, does the analysis plan cover: (279.55(b)(2))
Sampling methods? Y ☒ N ☐
Whether the oil will be tested before or after processing? Y ☒ N ☐
Frequency of sampling? Y ☒ N ☐
Analytical Methods? Y ☒ N ☐
Is the used oil fuel specification determination made by process knowledge? Y ☒ N ☐
If so, is the type of information that will be used to determine the halogen content stated in the analysis plan? (279.55(b)(3)) Y ☒ N ☐
5. Are all oil processing residues managed as used oil, reclaimed, or used as asphalt manufacture feedstock? (279.59) N/A ☐ Y ☐ N ☒
If not, has the processor conducted a hazardous waste determination? (279.10(e)) N/A ☐ Y ☐ N ☒
6. Are test records or copies of records providing basis for determinations kept for 3 years? (279.57(a)(2)(i)) Y ☒ N ☐

Recordkeeping and Reporting -- 279.57, 62-710.510-520 F.A.C.

1. Do used oil acceptance records include: (279.56(a))

Name & address of the generator or off site source of the used oil?	Y <u>✓</u>	N <u> </u>
EPA ID # of oil provider (if applicable)?	Y <u>✓</u>	N <u> </u>
Name & Address of the transporter delivering the oil to the facility?	Y <u>✓</u>	N <u> </u>
EPA ID # of the transporter delivering the oil	Y <u>✓</u>	N <u> </u>
Quantity of oil shipped?	Y <u>✓</u>	N <u> </u>
Type of oil received (62-710.510(1)(c))	Y <u>✓</u>	N <u> </u>
Date of shipment?	Y <u>✓</u>	N <u> </u>

2. Do used oil delivery records include: (279.56(b), also check marketer requirements)

Name & Address of receiving facility? (burner, processor or disposal site)	Y <u>✓</u>	N <u> </u>
EPA ID # of receiving facility?	Y <u>✓</u>	N <u> </u>
Name & Address of transporter delivering the oil?	Y <u>✓</u>	N <u> </u>
EPA ID # of transporter?	Y <u>✓</u>	N <u> </u>
Quantity of oil delivered?	Y <u>✓</u>	N <u> </u>
End Use of the oil? (62-710.510(1)(e))	Y <u>✓</u>	N <u> </u>
Date of delivery?	Y <u>✓</u>	N <u> </u>

3. Does the facility keep records on DEP Form 62-710.900(2) or equivalent? (62-710.501(1))

Y ✓ N

4. Does the facility submit an annual report by March 1 summarizing the on site records for the previous calendar year? (62-710.520)

Y ✓ N

If not, is the facility an electric utility processing only self generated used oil for recycling, which is exempt from state registration and reporting requirements? (62-710.530)?

Y N

5. Does the transporter keep copies of the record and reports for three years at the street address of the facility? (62-710.510(2))

Y ✓ N

Closure -- 62-710.800(3) F.A.C. and 279.54(h)

1. Has the facility submitted a written closure plan? (62-710.800(3)(a))

Y ✓ N

2. Does the plan include procedures for removing containers of oil and residues?

Y ✓ N

Cleaning and decontaminating tanks and ancillary equipment?

Y ✓ N

Removing contaminated soils?

Y ✓ N

Eliminating the need for further maintenance?

Y ✓ N

If the facility operated tank systems, and not all contaminated soils can be practicably removed, the owner or operator must close the facility as a hazardous waste landfill.

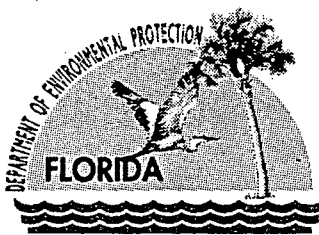
USED OIL MARKETER CHECKLIST

Facility Name: Howco Environmental Services Date: September 29, 1998
Facility Representative: Tim Hagan Facility ID #: FLD 152 764 767
Inspector: L. Strauss Registration #: _____

40 CFR 279 Subpart H -- Marketer Standards

1. Does the facility direct shipments of off-specification used oil to used oil burners? (except processors who burn incidentally) Y _____ N ☒

Or does the facility first claim that used oil that is to be burned for energy recovery meets the used oil fuel specification Y ☒ N _____
2. Check other Subparts the marketer complies with. (Must comply with at least one and have EPA ID #)
____ C - Generator ☒ E - Transporter ☒ F - Processor ____ G - Burner
3. Is the facility registered? (62-710.500(1)(c)) ____ N/A (Utility) Y ☒ N _____
4. Does the marketer only send off specification oil to burners with EPA ID Numbers (279.71(a)) N/A ☒ Y _____ N _____
And approved Industrial Furnaces or Boilers(279.71(b)) Y _____ N _____
5. Does the marketer claim the used oil meets the specification by analysis? Y ☒ N _____
Or by obtaining copies of generator performed analyses? (279.72(a)) Y _____ N ☒
6. Does the marketer have copies of written and signed certifications from all off specification oil burners to which he has directed shipments stating that the burner: (279.75) N/A ☒
Has notified EPA of its used oil management activities? Y _____ N _____
Will only burn off spec oil in an approved device? Y _____ N _____
7. Do Off specification oil delivery records include: (279.74(a)) N/A ☒
Name & Address of transporter delivering oil? Y _____ N _____
EPA ID # of transporter? Y _____ N _____
Name & Address of receiving burner? Y _____ N _____
EPA ID # of receiving burner? Y _____ N _____
Quantity of oil shipped? Y _____ N _____
Date of shipment? Y _____ N _____
8. Do on specification oil delivery records include: (279.74(b)) N/A ☒
Name & Address of receiving facility? Y ☒ N _____
Cross reference to analysis or other information used to determine that the oil meets the specification? Y ☒ N _____
Quantity of oil shipped? Y ☒ N _____
Date of shipment? Y ☒ N _____
9. Does the marketer keep copies of records for three years? (279.72(b)) Y ☒ N _____
10. Does the facility maintain records on DEP Form 62-710.900(2), including type of oil and destination or end use? Y ☒ N _____
11. Does the facility submit annual reports by March 1? Y ☒ N _____



Jeb Bush
Governor

Department of Environmental Protection

Southwest District
3804 Coconut Palm Drive
Tampa, Florida 33619

David B. Struhs
Secretary

June 10, 1999

Mr. Tim Hagan, President
HOWCO Environmental Services
3701 Central Avenue
St. Petersburg, FL 33713

**RE: HOWCO Environmental Services, Inc., FLD 152 764 767
Permit Application 92465-HO06-001 (f.k.a. HO52-308139)
Sixth Notice of Deficiency
Warning Letter #225256**

Dear Mr. Hagan:

The purpose of this letter is to advise you of possible violations of law for which you may be responsible and to seek your cooperation in resolving this matter. The Department has completed its review of the above referenced application and determined that the information submitted on May 3 and May 11, 1999, in response to the Fifth Notice of Deficiency is not complete. The information needed to complete the application is itemized in Attachment I, the Sixth Notice of Deficiency.

Failure to submit a complete application constitutes a violation of 62-710.800(1), Florida Administrative Code (FAC). You are requested to contact Roger Evans at (813)744-6100, extension 388, within fifteen (15) days of receipt of this Warning Letter to arrange a meeting to discuss this matter. The Department is interested in reviewing any facts you may have that will assist in determining whether any violations have occurred. You may bring anyone with you to the meeting that you feel could help resolve this matter.

In addition, when a permit application is incomplete, all processing of the application is suspended. You are hereby advised to provide the Department with two (2) copies of the necessary additional information within thirty (30) days of receipt of this letter, pursuant to 62-710.800, FAC and 403.0876, Florida Statutes (FS). In preparing a complete response to these comments, the Department recommends that the response be addressed in two sections. The first section should identify each comment and follow with the answer and discussion by the applicant. The next section should contain the revised pages of the application.

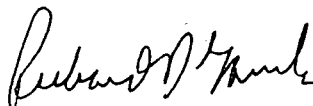
Please be advised that this Warning Letter is part of an agency investigation, preliminary to agency action in accordance with 120.57(4), FS. If after further investigation the Department's preliminary findings are verified, this matter may be resolved through the entry of a Consent Order which will include a compliance schedule, an appropriate penalty, and reimbursement of the Department's costs and

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expenses. In accordance with the United States Environmental Protection Agency's (EPA) RCRA Civil Penalty Policy of 1990, the penalties that have been assessed in this case are \$4,599 as shown in Attachment II. Costs and expenses in this case will be a minimum of \$100. If this matter cannot be resolved expeditiously, the Department will issue a Notice of Violation, begin the formal process to deny the permit pursuant to 120.60, FS, or take other appropriate actions. We look forward to your cooperation in the resolution of this matter.

Very Truly Yours,



Richard D. Garrity, Ph.D.
Director of District Management
Southwest District

RDG/sct

Attachments

cc: Narindar Kumar, EPA Region IV
Satish Kastury, FDEP – Tallahassee
Compliance File

ATTACHMENT I

HOWCO Environmental Services Used Oil Processing Permit Application

Summary Of Issues:

Attachment 1. List of Drawings

Prior to the Department accepting the application, all drawings must be signed and sealed by a professional engineer licensed in the State of Florida. These may be construction or as-built drawings.

Your response to the 5th Notice of Deficiency (NOD) indicated that the title of drawing D-8-1 was consistent with the title in the Table of Contents. This is not the case. Please revise the titles to be consistent.

Your response to the 5th NOD indicated that you would provide a the full 16" x 16" FIRM Flood Insurance Rate Map (City of St. Petersburg, Florida; Pinellas County; Panel 21 of 28; Community Panel Number 125148-0021-B) with the plant site locator. To date, this has not been received by the Department. Please include this map with your response.

Attachment 3. Detailed Process Description

Item 3.12 As stated in the 5th NOD, the Department will **not** accept your response to this issue. The Department can require a waste determination on antifreeze (see the 3rd paragraph in, "Florida Fact Sheet On The Management Of Waste Antifreeze"). The Department policy does not require testing if the antifreeze is **recycled**. From past discussions with HOWCO, we understand that HOWCO puts the antifreeze in its industrial wastewater pretreatment plant or sends it off-site for disposal. The frequency of the waste determination of the antifreeze shall be once, initially, and each time there is a process change. Please revise the text accordingly.

Attachment 4. Sampling & Analysis Plan

Item 4.2 The Department does not accept the premise that the processed oil generated at HOWCO meets the on-specification criteria based on generator's knowledge.

It was the Department's understanding at the March 25, 1999, meeting that HOWCO would submit a Sampling and Analysis Plan addressing the on-spec determination of processed used oil. Your May 7, 1999, submittal contains no such Plan. The data provided does not demonstrate that the sampling frequency of batches of processed used oil should be once/month as stated in your May 7 letter.

HOWCO may either (1) agree to sampling every batch prior to shipment off-site, or (2), provide a Sampling and Analysis Plan that the Department can approve. The Plan shall include at a minimum the requirements listed below:

- Frequency of sampling: A procedure that randomly selects, each week, a batch (tank) for sampling. Repeating the random selection, if necessary, until a full tank (one that is tagged-out for shipment) is selected;

Attachment 4. Sampling & Analysis Plan (Continued)

- Identify the name of the laboratory performing each analyses, the analytical methods used and the detection limits;
- Record date, time, batch number and tank number for each sample taken;
- Submit a Quality Assurance Plan using USEPA SW-846, Test Methods For Evaluating Solid Waste and 62-160.600 F.A.C., Quality Assurance, as guidelines;
- All batches (tanks) sampled are to be analyzed for all of the constituents in 40 CFR 279.11, Table 1 and PCB;
- Provide a procedure for re-processing processed oil that has been sampled and found to be off-spec used oil.

Item 4.2.1 The Department has noted your responses to the first three comments of Item 4.2.1, however, your response to the comment, "In the first paragraph, is one of the ten processed oil tanks the same as the process oil tank sampled for off-site shipment?", is confusing. First you indicate that yes, the used oil in the ten processed oil tanks is sampled for off-site shipment. However, in discussions with the Department, HOWCO has stated that not all tanks are sampled prior to off-site shipment. The text should be revised.

In your response explaining what is meant by "Periodic grab sampling and analysis is performed on one of the ten processed oil tanks once per week", you specify the sampling frequency. Therefore, the sentence, "Periodic grab sampling". should be deleted from the text.

In addition, the Department does not concur with the change of the sampling frequency from once/week to once/month. This issue is discussed in Item 4.2, above.

Attachment 5. Solid Waste Handling.

Please refer to the attached memo to Roger Evans from Susan Pelz, Solid Waste Section, dated May 20, 1999, for details on the following comments.

Item 5.1 Pre-qualification of generator's shipments must include a Waste Profile sheet **and** analytical data or MSDS (for virgin materials). See attached memo; comment #1.

Item 5.2.1 Please identify what "new" sentence was added to the 12/29/98 submittal to address this comment.

In the 4/30/99 submittal, a revision was added stating that, "The solidification agent may be soil, fly ash or spent absorbent material that is brought to the facility specifically for solidification purposes or generated onsite from used oil processing". Please remove the word "spent" and re-word to state, "The solidification agent may be clean soil, fly ash or absorbent material that is purchased specifically for solidification purposes. See attached memo; comment #2.

Item 5.2.2 In the last sentence, the word variance is not an appropriate term. Please revise to read, "FDEP-approved alternate procedure". See attached memo; comment #3.

Item 5.2.2.3 More clarification is needed on which solids will be sampled annually. See attached memo; comment #4.

Item 5.3 The total spectrum of petroleum hydrocarbons does not fall under the Used Oil rules. Please revise the descriptive terms "petroleum contaminated" and "petroleum hydrocarbon" solids, materials or wastes to "used oil contamination" or "oily" solids, materials or wastes. See attached memo; comment #5.

There shall be no incoming solid waste placed on the ground or pavement at the facility. See attached memo; #6.

Please provide further clarification on how materials are handled. See attached memo; comment #7.

The Department could not locate your revision to the text indicating that containers of processed waste are to be marked to distinguish them from containers of unprocessed waste. See attached memo; comment #8.

Item 5.4 Please be consistent in using the terms, "liquid/solids separator decanting tank", "oily solids batch treatment tank", and "cone separator tank". See attached memo; comment #9.

Item 5.5.1 Please be more descriptive on how and where oily solids are mixed prior to shipping off-site. See attached memo; comment #10.

Item 5.5.2 Please clarify the difference, if any, between "hydraulic press", "oil filter crusher" and the "drum crusher". See attached memo; comment #11.

Item 5.6 The Department did not agree that solids producing a sheen in water constitutes recoverable amounts of petroleum hydrocarbon. See attached memo; comment #13.

It does not seem reasonable that the sludge will dry in the sludge drying bed. Please describe the effectiveness of this process. See attached memo; comment #14.

Additional sentences were requested to explain the transfer of material from tanks 110 and 111 to roll-off boxes. HOWCO's response stating that material **may** be placed in a roll-off box is not acceptable. Solids are to be containerized and are to be processed, not disposed. See attached memo; comment #15.

Please clarify which storage location the solid waste is to be transferred to from the sludge drying bed or storage container. See attached memo; comment #16.

Attachment 8. Contingency Plan.

Item 8.1 Drawing D-8-1 is not titled "Process and Storage Plan" as identified in the text.

Item 8.5 The last paragraph, "Primary and alternate personnel qualified to act as Incident Coordinator are listed in Table 8-2", is missing from the 4/30/99 revision. Please insert this paragraph into the text.

Item 8.8 In items (a) through (e), item (b), "The plan fails in an emergency", is missing from the 4/30/99 revision. Please insert item (b) into the text.

Attachment 9. Unit Management Description.

Table 9-1 The table provided in the April 30, 1999, submittal is not the same table that the Department approved in HOWCO's December 28, 1998, submittal. Please provide two copies of the 12/28/98 version of Table 9-1.

Memorandum

Florida Department of Environmental Protection

TO: Roger Evans, Engineer IV, Hazardous Waste Section

FROM: Susan Pelz, P.E., Solid Waste Section

DATE: May 20, 1999

SUBJECT: HOWCO submittal dated April 30, 1999, Attachment 5 and Enclosure (3)

cc: Robert Butera, P.E., Solid Waste Manager
Stanley Tam, P.E., Hazardous Waste Manager
Al Gephart, Engineer III, Hazardous Waste

I have reviewed the above-referenced submittal and have the following comments:

Item 5.1, Pre-approval of Oily Solid Wastes

1. The information states, "Generators are required to pre-qualify their shipments utilizing one of the following methods...." [emphasis added] Since it is stated that only one of the listed methods is required, it is not clear if submission of a Waste Material Profile Sheet only would be sufficient for acceptance of the material. The Solid Waste Section does not believe that submission of a Waste Profile Sheet without analytical data or MSDS (for virgin materials) is acceptable.

Item 5.2.1, Solids Removed by the Vibrating Mesh Screen.

2. The information states, "The solidification agent may be soil, fly ash or spent absorbent material that is brought to the facility specifically for solidification purposes or generated onsite from used oil processing." In order to clarify this, the following changes should be made: "The solidification agent may be clean soil, fly ash or ~~spent~~ absorbent material that is ~~brought to the facility~~ purchased specifically for solidification purposes or generated onsite from used oil processing."

Item 5.2.2, Oily Solids Removed from Storage Tanks

3. The information states, "The thermal treatment facility will have the proper variance to treat the oily solids waste stream in accordance with F.A.C. 62-775." [emphasis added] Since "variance" is not technically the correct terminology, please change this to "The thermal treatment facility will have the proper **FDEP-approved alternate procedure** to treat the oily solids waste stream in accordance with F.A.C. 62-775."

Item 5.2.3, Sampling Plan for Solids

4. More clarification is needed on which solids will be sampled annually. Is it the processed (outgoing) solids, the incoming solids or solids which may be at some stage in the process (e.g. filter press solids, cone tank solids, etc.)?

Item 5.3, Incoming Oil Solids Acceptance Criteria

5. "Petroleum solids, petroleum impacted soils and used absorbent materials" are not included in the definition of used oil or oily wastes. For example, gasoline or diesel contaminated soil or sorbents would be "petroleum impacted" but are not authorized for management at the used oil processing facility. Wastes which are not used oil or oily wastes from which recoverable oil cannot be obtained shall not be managed at the site unless a solid waste permit is obtained. This section should be revised to clarify that "Oily waste contaminated solids, soils and used absorbent materials are processed for used oil recovery." Alternatively, "Solids, soils and used absorbent materials which are contaminated with used oil are processed for used oil recovery" is acceptable.
6. This section must clearly indicate that the solids (assumed to be received in containers) are removed from the containers and placed directly into the oily solids batch treatment tank or the cone separation tank. Residual solids resulting from processing in the oily solids batch treatment tank and/or cone tank must be discharged directly into a roll-off or other container for off-site disposal. No material is to be dumped on the ground or concrete slab in the solids processing area.
7. This section should include a description of how the materials are handled. For example, solids received in vac trucks are discharged directly into the processing/treatment tanks (see Enclosure (3), page 7, paragraph 5). How are solids received in drums are dumped in to the tanks? This information must be included in the application.
8. As discussed (see Enclosure (3), page 7, paragraph 4), the incoming and outgoing materials must be clearly distinguished. Procedures for this must be included in the application.

Item 5.4, Unloading of Oily Solid Wastes

9. It is not clear if the "liquid/solids separator decanting tank" is the same as the "oily solids batch treatment tank" or the "cone separator tank." This part should be changed to be consistent with other portions of the Operations Plan.

Item 5.5.1, Petroleum Solids (see also Comment #5 above)

10. The information states, "The remaining oily solids are then mixed with a solidification agent and allowed to dry.... Upon completion of the drying the solids are loaded into trucks and transported to a permitted landfill facility or thermal remediation facility for disposal." Where does this occur? Is this mixing conducted in a roll-off? How are the materials "mixed?" How are the materials "loaded into a truck?" See Comment #2 concerning solidification agents. Dumping the materials onto a concrete pad for mixing and solidification is unacceptable. Since the solids processing area is not covered (i.e. roof) it does not seem likely that the solids will effectively "dry out," especially during the rainy season.

Item 5.5.2, Booms and Pads

11. It does not seem reasonable to expect that used oil will be recovered from contaminated booms and pads through processing with a hydraulic press. It is not clear if the "hydraulic press" is the same as the "oil filter crusher" and/or the "drum crusher." Information on each of these units should be provided. Since the hydraulic press was "made by the Company [HOWCO]", the Department has no assurance that this unit was designed and manufactured with the purpose of processing contaminated booms and pads. The information in Enclosure (3), page 7, paragraph 1 indicates that the booms and pads may also be crushed in the used oil filter crusher or drum crusher. If these units were purchased from an equipment manufacturer (as opposed to fabricated by HOWCO), documentation from the manufacturer indicating that the used oil filter crusher or drum crusher is suitable for extracting used oil from contaminated booms and pads should be provided. The processing of other used oil contaminated sorbents should be discussed.

Item 5.6, Petroleum Contaminated Solid Waste

12. See Comment #5 above concerning "petroleum" contaminated solids.

13. The information states, "petroleum contaminated solid waste includes sludges, oil dry, absorbent material, soil, debris, wood, clay, concrete, spent blast media and other petroleum residuals which are classified as a non-hazardous waste. The petroleum contaminated solid waste may be generated on or off site.... Solid waste that produces a sheen when placed in water will be deemed to contain a recoverable amount of petroleum." It is not my recollection that the Department agreed to this definition, although Enclosure (3), page 7, paragraph 3 indicates that the Department agreed to this proposal. It does not seem reasonable that "debris, wood, clay, concrete, and spent blast media" would be sufficiently contaminated to be able to recover used oil. Unless the applicant conclusively demonstrates that used oil can be recovered from these materials, the management of these materials will require a separate solid waste permit.

14. Where is the sludge drying bed located? Is it covered? If it is not covered, it does not seem reasonable to expect that the sludge will dry effectively. See Comments #6 and #10 above concerning placement of contaminated materials on the ground or concrete pad.

15. The information states, "The solids from the decanting separation may be placed in a roll-off box for shipment off site. The petroleum contaminated solid waste from the decanting separation that has recoverable petroleum will be processed in either the Oily Solids Batch Treatment Tank Number 111 or the Cone-Bottom Tank Number 110." This should be revised to, "The solids... will be placed in a roll off box for shipment off site, or in the Oily Solids Batch Treatment Tank or Cone-Bottom Tank." The Department understands this section to mean that all oily solids will first have free liquids decanted. They may then be further processed in the Oily Solids Batch Treatment or Cone-Bottom Tanks. It would be helpful if a flowchart was provided which shows each incoming waste stream (oily solids, oily sludges, used oil contaminated booms and pads, used oil contaminated sorbents), processing steps, testing steps, mixing, drying, etc., and final disposition.

16. The information states, "The solid waste will be transferred from the sludge drying bed or storage container by using a solids handling vacuum truck. The truck will be used to vacuum the petroleum contaminated solid waste from the storage location into the truck tank." To which "storage location" does this refer? See Comment #5 above concerning "petroleum" contaminated solids.

sjp

ATTACHMENT II

PENALTY COMPUTATION WORKSHEET

Facility Name: HOWCO Environmental Services

Facility Address: 3701 Central Avenue, St. Petersburg, FL 33713

Penalty Computed By: Stanley Tam

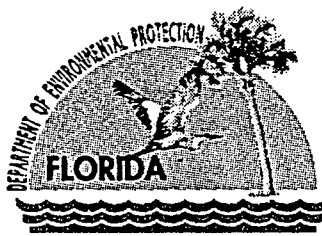
Date: June 4, 1999

PART I - Class A Penalty Determination

	Violation Type	Potential for Harm	Extent of Deviation	Matrix Amount	Multi-Day	Adjustment	Total
1	62-710.800(1), FAC	moderate	major	\$4599			\$4599
2							
3							

Total Penalties for All Violations: **\$4,599**

(Attach Part II for each violation for which an adjustment on multi-day penalty is determined)



Jeb Bush
Governor

Department of Environmental Protection

Southwest District
3804 Coconut Palm Drive
Tampa, Florida 33619

David B. Struhs
Secretary

March 1, 1999

Mr. Tim Hagan, President
Howco Environmental Services
3701 Central Avenue
St. Petersburg, FL 33713

RE: Howco Environmental Services, FLD 152 764 767
Used Oil Permit Application HO52-308139
Fifth Notice of Deficiency

Dear Mr. Hagan:

The Department has completed its review of the referenced application received on January 4, 1999, and February 4, 1999, and has determined that the information submitted is incomplete. These issues that are in need of resolution are outlined in the attached summary.

The deficiencies noted in the summary constitute a violation of Department rules. Failure to correct these deficiencies within the allotted time frame given below will subject Howco Environmental Services to formal enforcement action, which may include the imposition of a monetary penalty.

In preparing a complete response to these comments, the Department recommends that the response be addressed in two sections. The first section should identify each comment and followed with the answer and discussion by the applicant. The next section should contain the revised pages of the application.

Please provide two (2) copies of your written response within thirty (30) days. Should you have any questions, please contact Al Gephart at 813-744-6100, extension 372 or myself at extension 388.

Sincerely,

Roger C. Evans
Permitting Engineer
Hazardous Waste Section

cc: Tim Rudolph, Environeering, Inc.

ag-inbox/howco/letters/3-1-99.doc

"Protect, Conserve and Manage Florida's Environment and Natural Resources"

Printed on recycled paper.

**HOWCO Environmental Services
Used Oil Processing Permit Application**

Summary Of Issues:

Table of Contents

Titles and page numbers identified in the 'Table of Contents' and 'List of Tables and Forms' do not match the pages in the application. For example:

- Items 3.9, 3.10 and 3.11 should be designated as being on page 3-7
- Item 3.12 should be designated as being on page 3-8.
- Item 5.2.1 should be designated as being on page 5-1.
- Item 5.3 has a different title in the text than what appears in the table of contents.
- Table 3-1 should have the word "processing" in the title.
- Table 3-2 should have a new title.
- Table 9-1 should be designated as being on page 9-3

Attachment 1. List of Drawings

D-6-2 On page 1-1, the title of drawing D-6-2 should be Emergency Containment No. 1, 2 and 3 not Emergency Containment No. 2.

D-8-1 How does the title "Process & Storage Equipment Plan" relate to drawing D-8-1?

Attachment 1 also has drawing D-8-1 labeled as "Emergency Containment No 1". How are these two titles related?

20782-6TF-024 Please change the title from "St. Petersburg, Fl - Map" to "Site Location Map".

Please indicate if the drawings provided are "as built" drawings. All drawings shall be signed and sealed by a professional engineer licensed in the State of Florida.

125148-00210-B Please place the plant site locator on the full 16" x 16" FIRM Flood Insurance Rate Map (City of St. Petersburg, Florida; Pinellas County; Panel 21 of 28; Community Panel Number 125148-0021-B.)

Drawing D-4-2 Tanks A and B should be labeled with a corresponding number to tanks listed in Table 3-2. All drawings should be revised to indicate the numerical designations of these two tanks.

Attachment 2. Brief Description Of Facility Operation.

Item 2.2 As written, the Department understands that the solids generated from the wastewater treatment filter press will **not** be managed with any other waste stream prior to shipment off site. Please be more specific in re-wording the text to insure that this is true.

Item 2.3 In the last paragraph, what are dump trainers?

Attachment 3. Detailed Process Description.

Item 3.12 If the Generator does not perform the TCLP test, will Howco pick up the used antifreeze? If so, is it tested? Please discuss this scenario within the text.

Item 3.12.1 How does a Freon leak detector determine if the used antifreeze is acceptable or unacceptable?

Table 3-3 Are the tanks identified in Containment area 5 proposed or existing?

Attachment 4. Sampling & Analysis Plan.

Item 4.2 The Department does not accept the premise that the processed oil generated at Howco meets the on-specification criteria based on generator's knowledge. Before the Department can accept a statistical analysis demonstrating Howco's processed oil is on-spec, all data forming the bases for the study must be provided for review and validation. The information describing the statistical analysis provided in the application is too vague and convoluted to be accepted at face value. Such statements as "various parameters that are measured qualitatively are averaged and the standard deviation is determined to provide the statistical analysis of data" and "the average value plus or minus the standard deviation is used as the acceptable range for a given parameter being normal" cannot be accepted at face value. The values must be clarified and supported in the context of the statistical analysis. Until it can be statistically proven that Howco's processed used oil is on-spec, **each tank of processed oil must be sampled** and tested to verify the quality of the oil.

Item 4.2.1 In the first paragraph, is "one of the ten processed oil tanks" the same as "the process oil tank sampled for off-site shipment"?

In the first paragraph, how do the last two sentences "fit in" with the previous three sentences?

Please explain what is meant by "Periodic grab sampling and analysis is performed on one of the ten processed oil tanks once per week".

In the third paragraph, how many "tagged-out" tanks does 5-10 loads represent?

How long is the tank agitated using compressed air before the tank is sampled? What effect does the air injection have on the total halogen concentration in the processed oil?

Please explain why samples are held for 30 days. Holding times of US EPA approved methods for halogenated volatile organics is 14 days and for PCBs, 7/40 days. Any testing of samples held for longer periods than those stated would be invalid.

Item 4.3.2 There is no reference to Table 4-2 in the text. Please consider deleting the Item 4.3.2 and re-wording Item 4.3.1 to read "Incoming industrial wastewater is sampled using the bailer and analyzed for the following constituents/properties identified in Table 4-2."

Attachment 5. Solid Waste Handling.

Item 5.1 In the third bullet, the page number for Table 5-1 is incorrect.

Item 5.2 Please indicate on the facility site plan the location of the vibratory screen. In addition, revise the text to include a more detailed operating description of the vibratory screen.

- Item 5.2.1 In the first paragraph, please re-word the text to make it explicit that only “virgin” materials are to be used for solidification, stabilization or absorption.

In the 11th sentence, the activities are only acceptable if virgin materials are used or the wastes are generated on-site from used oil processing.

- Item 5.2.2 In the third paragraph, the waste cannot be accepted by a soil thermal treatment facility.

- Item 5.3 The processing activities described in this paragraph requires a solid waste permit.

- Item 5.5.1 Howco is required to perform a waste determination on the petroleum contaminated solids and “other” solids coming into the facility. Please include language which will satisfy this requirement.

Howco has failed to provide the Department with reasonable assurance that solid waste will not be accepted. **The Used Oil Processing Permit does not authorize the acceptance or management of solid waste.** If Howco anticipates acceptance of solid waste, a separate solid waste permit is required. Please refer back to the Department’s ‘Third Notice of Deficiency’ letter, Attachment 5.

Attachment 7. Preparedness And Prevention Plan.

- Item 7.2 Equipment which “may be” available for use in a spill control is not acceptable language to the Department. The equipment is either available or not available in times of emergency. Please revise the text to be consistent with the title.

- Item 7.5 This paragraph identifies that preventative maintenance will be completed on an annual basis but does not establish the frequency emergency equipment will be tested. Please revise the text to include this information.

Table 7-5 Delete the word “may”.

Attachment 8. Contingency Plan.

The Contingency Plan should be designed to be a ‘stand alone’ document, and hence all references such as drawings, etc. are to be contained within the plan. Please modify the plan to include all outside referenced documents.

- Item 8.1 Drawing D-8-1 is not titled “General Arrangement Plan” as identified in the text. What is a “General Arrangement Plan”?

In Item 8.1 and 8.3, the text mentions chemical usage and storage areas but these locations are not indicated on the referenced drawings D-6-1 and D-8-1. Please revise the drawings to indicate the locations of the liquid chemical handling and storage areas.

- Item 8.4 In paragraph 1, the last sentence, please re-word the sentence to clarify that monthly inspections are to be performed independent of any intensive storm water event.

- Item 8.8 In the second paragraph, please add an evacuation route posting at the Filter Press/Crusher area.

- Item 8.11 Please revise drawing D-4-1 to show the locations of emergency response and control equipment.

Attachment 9. Unit Management Description.

- Item 9.1 A review of Tables 3-1, 3-2 and 3-3 shows that there are 51 tanks total but the text states that there are 48 tanks. Please correct this discrepancy. The last sentence in Item 9.1 should also include a reference to Table 3-3.

In the third paragraph, the text states ten tanks, then nine. Please clarify this inconsistency.

In the third paragraph, why are the capacities in "brackets"?

In the fourth paragraph, the capacity of Dike No. 3 does not agree with the capacity stated in Table 3-2. Please revise the text to be consistent.

In the fifth paragraph, correct the "typo" 46,0010 gallons.

- Table 9-1 Please revise the note on Table 9-1 to indicate inspections must be conducted at least every 30 days, not 31 days.

- Item 9.6 The Department has received your letter dated February 19, 1999, which submitted changes concerning the discharge of stormwater and the use of the existing stormwater oil water separator. This review has been forwarded to the Industrial Waste Section for their review and comments.

Attachment 10. Closure.

- Item 10.4 Since a closure permit is not required to close a used oil processing facility, the Closure Permit time frame should not be included in the schedule for closure.

Please add a line item indicating the time to submit the certification of complete closure.



Department of Environmental Protection

Lawton Chiles
Governor

Southwest District
3804 Coconut Palm Drive
Tampa, Florida 33619

Virginia B. Wetherell
Secretary

July 28, 1998

Tim Hagan, President
Howco Environmental Services
3701 Central Avenue
St. Petersburg, Florida 33713

RE: *Howco Environmental Services, FLD 152 764 767*
Operating Permit Application HO52-308139
Third Notice of Deficiency

Dear Mr. Hagan:

The Florida Department of Environmental Protection (FDEP) has completed its review of the referenced application received on July 1, 1998, and determined that the information submitted is not complete. The information needed to complete the application is itemized in the attached Notice of Deficiency.

When a permit application is incomplete, all processing of the application is suspended. You are hereby advised to provide us with the necessary additional information, pursuant to the Florida Administrative Code (FAC) Rule 62-710.800 and Chapter 403.769 Florida Statutes (FS).

The deficiencies noted in the attached Notice of Deficiency constitute a violation of FDEP rules. Failure to correct these deficiencies within 45 days could subject you to formal enforcement action. If you cannot submit this information in 45 days, you must provide a schedule with dates indicating when this information will be submitted. If a complete response to each item is not submitted within the time frame given above, the FDEP will issue a Notice of Violation, begin the formal process to deny the permit pursuant to Section 120.60, FS, or take other appropriate actions.

The response made by Howco Environmental Services (Howco) to each item shall be as noted in Section 62-710.800(6), FAC which details the Certification of plans, specifications and other related documents supporting the permit application by a professional engineer registered in the State of Florida.

In addition, each response must note that a revision has been made (a revised date in the revision block, the revision number should remain "0" until the application is deemed complete) and the response must be labeled and numbered such that it can be placed in the appropriate section of the application. This might necessitate the submittal of a new table of contents reflecting the revisions and correct page numbers.

Two copies of your response shall be submitted to the FDEP office in Tampa, Florida. You are encouraged to contact this office to discuss the deficiencies noted by the application review. This exchange of ideas will assist you in developing a complete and adequate response.

Should you like to arrange a meeting or if you have any questions, please contact me at (813) 744-6100, extension 388.

Sincerely,



Roger Evans
Permitting Engineer
Hazardous Waste Section
Division of Waste Management

Attachment

cc: Raoul Clarke, Administrator, FDEP -- Tallahassee
Satish Kastury, Administrator, FDEP -- Tallahassee

Notice of Deficiency

Part 1-B-3

The Flood Insurance Rate Maps (125148-0027-B and 125148-0028-B) provided by Howco does not have sufficient information to demonstrate that the facility is not within the 100-year flood plain area. Please provide the panel of the map that identifies the area in which the facility is located. The facility's location should also be noted on the diagram.

Throughout the application Howco specifies that the used oil they process is recycled. Based on common usage the word "recycling" means reuse of the used oil. Since Howco is not reusing the used oil another term should be used throughout the application.

Attachment 3

Item 3.8. The application must describe the sampling conducted on the facility generated solids prior to mixing with a solidification agent.

Item 3.11. Describe what permit(s) or exemption(s)/exclusion(s) is Howco operating under for the two air strippers.

Item 3.12.1. Halogen screening is insufficient as a prescreen for antifreeze destined for disposal. Antifreeze destined for disposal must be sampled and analyzed by the generator for contaminants of concern prior to customer pick-up by Howco.

Attachment 4

Item 4.1.1. Describe in detail how a "composite sample" is obtained from multi-compartmented vehicles.

Item 4.1.2. The third bullet identifies an EPA Method 8021A which has been replaced by 8021B. Please make the appropriate change to the text.

Even if concentrations of halogenated solvents in used oil are below 100 ppm each, does not automatically provide the rebuttal in every instance. For example, a particular batch of used oil is known to be contaminated with "F-listed" solvent waste through generator knowledge. In that case, the mixture should be treated as hazardous waste and the rebuttal cannot be demonstrated. Revise the text to add that in addition to the 50 FR 49176 guidance, a case by case determination should be made.

Item 4.2. Where and what is the Statistical data analysis mentioned in this paragraph?

Item 4.2.1. Please explain what is a discrete sample and a discrete composite as identified in the text. Is it equivalent to a grab sample? Please describe in more details the purpose of sampling, methods to be utilized and frequency of sampling.

Item 4.2.2. What is Method ASTM D93-85?

Item 4.4.1. The terms industrial solids and industrial cleaning are not specific enough as it may not include petroleum related waste.

Item 4.4.2. Is Howco proposing to perform a hazardous waste determination on a solid waste stream based solely on analyzing for TCLP metals and TCLP volatile organics?

Attachment 5

The information submitted in Attachment 5 appears to indicate that Howco will be managing "oil solids products from customers." The management of the solid waste materials described do not seem to be intrinsically linked to, or a by-product of, a traditional used oil processing operation. Please refer to the Department's memorandum (enclosed) dated March 5, 1998 on this subject. Since these materials are solid wastes and are destined for disposal, and not recycling, they must be managed pursuant to a separate permit required by Chapter 62-701, FAC. Please indicate whether or not Howco intends to manage these solid waste materials. Although the used oil processing facility application may describe the management of these solid waste materials, the used oil permit which may be issued pursuant to Chapter 62-710, FAC., cannot authorize the management of these materials. If Howco elects to manage these solid waste materials, the Department's Solid Waste Section must be contacted concerning the solid waste permitting requirements for this activity.

Item 5.5.4. The language included in your response needs to be incorporated into the application.

Item 5.4. Please explain what is meant by "Both parts of this facility are utilizing a concrete pad surrounded on three sides with block walls....."

Attachment 6

The tracking plan as outlined does not comply with the requirements of 40 CFR 279.56. Please review the rules governing this section and amend the tracking plan accordingly.

Item 6.3. This section does not comply with the requirement of 40 CFR 279.57(a)(2). Please revise this section to include; (i) Records and results of used oil analyses performed; and (ii) Summary reports and details of all incidents that require implementation of the contingency plan as specified in 40 CFR 279.52(b).

Attachment 7

Item 7.3. Your response did not address our comments. The application must describe the inspection, testing and maintenance of the emergency equipment.

Item 7.5. Form 7-6 could not be located. Please provide this form.
Form 8-3 could not be located. Please provide this form.

Item 7.3. This application should be specific in identifying the equipment that **will** be available for spill control. Please modify the language accordingly.

Table 7-3 The complete home address of the incident coordinators was not presented.

Table 7-4 The Florida Department of Environmental Regulations is now known as Florida Department of Environmental Protection.

Attachment 8

The contingency plan should be designed to be a stand alone document and all references should be included within the section.

Item 8.3. Please expand on what is meant by "All chemical usage areas where spills are likely to occur are found in the process and storage Equipment Location Plan."

Item 8.4. The last paragraph indicates that captured storm water from the property may be discharged into the storm sewer system. Please describe the precaution taken to insure that no contaminants flows off-site.

Item 8.8. Copies of the evacuation routes should not only be kept in a book in the plant office but posted at strategic locations throughout the facility. Please include verbiage that describes where other copies will be located.

Attachment 9

Item 9.1. The description of the storage tanks within the tank farm does not match Tables 9-1 and 9-2.

Tables 9-1 and 9-2 Please provide drawings that identify the containment areas 1, 2 and 3 as identified within these tables. Please provide the calculations that were used to determine the containment volumes of areas 1, 2 and 3. All engineering drawings, specifications and calculations shall be signed and sealed by an independent Professional Engineer registered in the State of Florida.

Item 9.4. Your response indicates that the piping system is all above ground and within secondary containment area, but the application does not mention any of this. Please clarify this inconsistency.

Table 9.3 Please identify how will the inspector determine that the areas inspected (e.g., 'Trailer with product locked' to 'Drum inspection') are of satisfactory or unsatisfactory condition. The log should also include an area that records any corrective action taken or needed to be taken.

Attachment 10

Item 10.2.1 Please include the justification for the number of samples and the sample locations selected. A statistically significant number of random soil samples should also be selected as previously discussed with Mr. Bill Crawford.

The soil sampling need to address samples through the asphalt or concrete around the tank farms and processing areas.

Item 10.4. The application needs to include an outline of the closure schedule activities to be performed by the facility. A response of "six months" to remove oil product and residues is not adequate.

Attachment 11

The discussion of the training requirements at Howco does not identify some of the main regulatory rules (i.e., Used Oil Regulations 40 CFR 279 and State Regulations 62-710 FAC) that the training program is intended to satisfy. The plan should also describe the records used to document employees training and how these records will be managed, who (job title) will retain the records, how long the records will be retained, frequency of training hours that will be provided, and formal aspects of the hands on training that provide the necessary training to the employees. This information must be included in the application.



Department of Environmental Protection

Lawton Chiles
Governor

Southwest District
3804 Coconut Palm Drive
Tampa, Florida 33619

Virginia B. Wetherell
Secretary

Tim Hagan, President
Howco Environmental Services
3701 Central Avenue
St. Petersburg, Florida 33713

October 24, 1997

RE: Howco Environmental Services, FLD 152 764 767
Operating Permit Application HO52-308139
Second Notice of Deficiency

Dear Mr. Hagan:

The Florida Department of Environmental Protection (FDEP) has completed its review of the referenced application as revised on September 25, 1997, and determined that the information submitted is not complete. The information needed to complete the application is itemized in the attached Notice of Deficiency.

When a permit application is incomplete, all processing of the application is suspended. You are hereby advised to provide us with the necessary additional information, pursuant to the Florida Administrative Code (FAC) Rule 62-710.800 and Chapter 403.769 Florida Statutes (FS).

The deficiencies noted in the attached Notice of Deficiency constitute a violation of FDEP rules. Failure to correct these deficiencies within 45 days could subject you to formal enforcement action. If you cannot submit this information in 45 days, you must provide a schedule with dates indicating when this information will be submitted. If a complete response to each item is not submitted within the time frame given above, the FDEP will issue a Notice of Violation, begin the formal process to deny the permit pursuant to Section 120.60, FS, or take other appropriate actions.

The response made by Howco Environmental Services (Howco) to each item shall be as noted in Section 62-710.800(6), FAC which details the Certification of plans, specifications and other related documents supporting the permit application by a professional engineer registered in the State of Florida.

In addition, each response must note that a revision has been made (a revised date in the revision block, the revision number should remain "0" until the application is deemed complete) and the response must be labeled and numbered such that it can be placed in the appropriate section application. This might necessitate the submittal of a new table of contents reflecting the revisions and correct page numbers.

Two copies of your response shall be submitted to the FDEP office in Tampa, Florida. You are encouraged to contact this office to discuss the deficiencies noted by the application review. This exchange of ideas will assist you in developing a complete and adequate response.

Should you like to arrange a meeting or if you have any questions, please contact me at 813 744-6100 extension 372.

Sincerely,

A handwritten signature in dark ink, appearing to read "William C. Crawford", is written over the printed name.

William C. Crawford
Permitting Engineer
Hazardous Waste Section
Division of Waste Management

Attachment

cc: Raoul Clarke, Administrator, FDEP - Tallahassee
Satish Kastury, Administrator, FDEP - Tallahassee

Notice of Deficiency

General Comments:

The FDEP, as agreed, reviewed the Howco document submitted in support of the notice of intent to use a General Permit. This document is the Howco Spill Prevention Control and Countermeasure and Contingency Plan (SPCC&C) identified as Revision 4, January, 1996. The information requested in the new used oil processor permit is broader and more specific than was required by the permitting process for the General Permit. The comments and questions prepared as a result of the review of this document are intended to aid in the preparation of an acceptable application.

Each section of the application form should provide a reference to the location within the application that contains the necessary information.

Part I-A 1

Howco has operated under the requirements of a Florida General Permit in the past, but this application and subsequent permit will be the first used oil program specific permit. This block should be checked new. OK

Part I-A 2

The information requested in this item was not provided. As noted in the cover letter, this item and all pages of the application should indicate revision '0' until the application is deemed complete. ✓

Part I-A 3

The information requested in this item was not provided. ✓

Part I-A 4

The year that used oil processing began at this facility should be indicated instead of the general time frame provided. ✓

Part I-B 1

The information requested in this item was not presented in the spaces provided. The information on the included blue prints indicated that 'surrounding community' was the nearest community. The application is looking for the identity of the nearest governmental agency. ✓

Part I-B 2

The information requested in this item was not presented in the spaces provided. The information was provided on the included blue prints, but must also be inserted or referenced in the blanks. ✓

The description must include how the facility will manage the records of this familiarization.

Specific questions on items related to facility preparedness and prevention are identified below:

Item 7.1. The application must identify the schedule for the upgrading of the containment systems for the tank systems.

Are drivers required to be present when loading and unloading trucks and or containers? What type of communication is available to the drivers during unloading and loading operations? Are loading or unloading operations conducted with only the driver present at the facility?

Item 8.5.9. As described, the only incident requiring a written report would be a release of oily material that leaves the property. The reporting requirements of 62-710 FAC, 62-762 FAC, and 40 CFR 279 should be reviewed to determine when a spill or release must be reported, and the application revised as necessary.

Attachment 8 (Contingency Plan)

The contingency plan as presented does not include all the information requested in the instructions for completion of the application. The information not identified and specific questions of the information in the contingency plan are identified in the following comments. The item numbers are references to the instructions for completion of the application form.

Item 7.a The application only presents the specific actions to be taken by the Incident commander in response to fire and explosions. Action to be taken by other employees must be included.

Item 7.b The description of the emergency response arrangements is not presented.

Item 7.c The qualifications of the emergency response coordinators are not presented.

Item 7.e The plan includes a list of equipment available during an emergency, but does not describe the capabilities of the equipment nor is the location of the spill response equipment identified on a facility map.

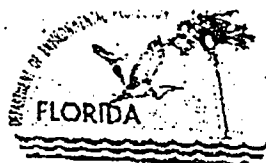
Item 7.f The location of tanks and containers specifically dedicated for the storage of spill or released materials is not identified.

Item 7.h The application does not indicate that the evacuation routes are posted in the plant and should be revised to indicate where copies of the evacuation routes will be posted.

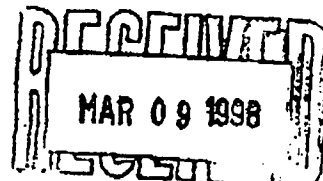
The closure plan discusses the taking of soil samples from location of visual soil staining at the facility. The application must include a discussion of mandatory soil sampling and contingent groundwater sampling. The plan should also include any additional actions the facility will take should contaminated soils or groundwater be identified during the sampling.

Training

The training plan for the facility could not be located, and must be included as a portion of the application.



Department of Environmental Protection



Lawton Chiles
Governor

Twin Towers Office Building
2600 Blair Stone Road
Tallahassee, Florida 32399-2400

Virginia B. Wetherell
Secretary

MEMORANDUM

TO: Used Oil Processors

FROM: Rick Neves, Environmental Specialist *RN*

DATE: March 5, 1998

SUBJECT: Solid Waste Permit Considerations for Used Oil Processors

While the management of waste materials generated during the processing of used oil is addressed in the Used Oil Processor Permit, it has come to the attention of the Department that some Used Oil Processors may also be subject to Solid Waste permit requirements as well. The purpose of this memo is to clarify this issue.

Various and sundry items besides processing sludges may be "oily wastes" under 62-701.200(76), or "materials containing or otherwise contaminated with used oil" under 40 CFR 279.10(c). It is not uncommon for handlers to manage these materials at their used oil processing facilities. However, there are some businesses which actively solicit and manage significantly large quantities of these "oily wastes" at their facilities. The question then is "Is this used oil processing or solid waste management?" It is clear in reading 57 FR 41581 (Sept. 10, 1992) that EPA expected some materials to contain a quantity of free flowing used oil which may be recovered and recycled (e.g. filters, wipers and absorbent materials). It is also clear that these items may be managed as used oil provided the used oil is to be recovered and recycled. Once the used oil is separated from the material, the material may be managed as used oil if burned for energy recovery, or as solid waste if it is determined to be non-hazardous and destined for disposal.

It is difficult to arbitrarily differentiate between oily and solid waste management for permitting issues. Some facilities focus on managing liquids where this may not be much of a problem while others include management of solids that may not fall within the definition of "oily wastes".

If the "oily waste" management seems intrinsically linked to, or a byproduct of, a traditional used oil processing operation, then it would seem that this activity might be addressed in a specific condition of the Used Oil Processor Permit. If, on the other hand, what is being managed seems to be an assortment of various solid wastes not traditionally considered liquid used oil (though it may contain a limited amount of recoverable used oil), or is a non-petroleum contaminated solid waste, a solid waste permit would be required. This is ultimately a determination that must be made at the District level between the District and the facility while maintaining consistency with other District decisions. Concerned parties should keep in mind that all "oily wastes" may not necessarily be used oil.

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Department of Environmental Protection

Lawton Chiles
Governor

Southwest District
3804 Coconut Palm Drive
Tampa, Florida 33619

Virginia B. Wetherell
Secretary

Tim Hagan, President
Howco Environmental Services
3701 Central Avenue
St. Petersburg, Florida 33713

July 22, 1997

RE: Howco Environmental Services, FLD 152 764 767
Operating Permit Application HO52-308139
First Notice of Deficiency

Dear Mr. Hagan:

The Florida Department of Environmental Protection (FDEP) has completed its review of the referenced application and determined that the information submitted is not complete. The information needed to complete the application is itemized in the attached Notice of Deficiency.

When a permit application is incomplete, all processing of the application is suspended. You are hereby advised to provide us with the necessary additional information, pursuant to the Florida Administrative Code (FAC) Rule 62-710.800 and Chapter 403.769 Florida Statutes (FS).

The deficiencies noted in the attached Notice of Deficiency constitute a violation of FDEP rules. Failure to correct these deficiencies within 45 days could subject you to formal enforcement action. If you cannot submit this information in 45 days, you must provide a schedule with dates indicating when this information will be submitted. If a complete response to each item is not submitted within the time frame given above, the FDEP will issue a Notice of Violation, begin the formal process to deny the permit pursuant to Section 120.60, FS, or take other appropriate actions.

The response made by Howco Environmental Services (Howco) to each item shall be as noted in Section 62-710.800(6), FAC which details the Certification of plans, specifications and other related documents supporting the permit application by a professional engineer registered in the State of Florida.

In addition, each response must note that a revision has been made (a revised date in the revision block, the revision number should remain "0" until the application is deemed complete) and the response must be labeled and numbered such that it can be placed in the appropriate section of the submitted application. This might necessitate the submittal of a new table of contents reflecting the revisions and correct page numbers.

Notice of Deficiency

Part I-A 1

Two locations were checked as applicable. The renewal location should be left empty.

Part 1-B-3

The map indicating the location of the 100 - year flood plan could not be located. A topographic map depicting the location of the 100 - year flood plan, and the source of the information must be included in the application.

Part I-C.4 (Attachment 3)

The application does not discuss the generation, capture or reuse of the off-gasses generated during the distillation process. This information should be included in this application, and the application should describe how this information is presented to the FDEP air section. The detail description of the process has been rewritten and the relationship to previously submitted information (which describes processing based on weight percentage water) is not clear. The application must describe the management of each separate stream.

Item 3.7⁹ and 5.2. The application has been revised to include a general description of the management of the solids generated by SWECO oil / solid separator. The description does not provide sufficient details on the processing, solidification and disposal of these solids.

Item 3.7.2. The application states that oil recovered from the emulsion breaking treatment is pumped directly into the product storage tank. The fate of the emulsion breaking chemicals should be discussed.

Item 3.7.3. The discussion of used oil decanting from the tanks in the waste water treatment facility has been removed. Has Howco discontinued this practice, and if so what are the new procedures?

Attachment 5. The application should describe the fate of the dewatering liquid removed from process sludges.

Item 2.3. This item references a sludge processing facility. This facility was not identified on the site plan. Is this facility the sludge drying bed? The description does not match previous descriptions provided during meetings and site visits. Additionally, the process associated with the sludge drying bed should be described. The management of all waste streams should be identified.

Item 2.4 The application should describe how the oil from the compacted filters is recovered.

Attachment 4 (Waste Analysis Plan)

Part I-B 3

Section 2 of the SPPC&C gives a detailed description of the plant operation. The section did not include any topographic or scale maps of the facility, or a map indicating the 100 year flood plane. A copy of an FID or FEMA map for this area should be included.

Part I-C 1

The application does not indicate the hazardous waste generator status of the site. Please note that this question address all aspects of the facility operations, and a response is required in this and item I-C 2.

Part I-C.3 (Section 2)

The overview of plant operations should include an estimate of the number of employees.

Part I-C.4 (Section 2)

The application does not discuss the generation, capture or reuse of the off-gasses generated during the distillation process. This information should be included in this application, and the application should describe how this information is presented to the FDEP air section.

Line 4, Paragraph 1, page 5, Section 2.1.1. The application should describes the management of the solids generated by SWECO oil / solids separator.

Line 5, Paragraph 1, page 5, Section 2.1.1. This sentence implies that all batch tanks of oil are sampled and analyzed. The waste analysis plan indicates that product knowledge may be used to determine product oil specifications. Please revise the application to have a consistent description of product sampling and analysis.

Line 1, Paragraph 2, Page 7, Section 2.1.3. The application states that oil recovered from the emulsion breaking treatment is pumped directly into the product storage tank. The fate of the emulsion breaking chemicals should be discussed.

Line 4, Paragraph 2, 6, Section 2.2. The annex containing the discharge limits for the St. Petersburg Waste Water Treatment facility could not be located.

referenced
removed

Paragraph 5, Page 9, Section 2.2. The application indicates that materials being processed in the waste water treatment facility are tested. The application should describe the analysis performed on these wastes.

Line 2, Paragraph 1, Page 10, Section 2.2. The application should describe how the oil is decanted from the tanks in the waste water treatment facility.

Item 3.9
discussion of
used oil decan-
has been rem-

Page 10, Section 2.2. The management of the solids and contaminated sands generated by the waste water treatment process should be described.

Line 1, Paragraph 2, Page 12, Section 2.3. The application should describe the fate of the dewatering liquid removed from process sludges. X

Line 2, Paragraph 2, Page 12, Section 2.3. The application should describe the range of and or description of 'proper disposal' facility.

Line 4, Paragraph 3, Page 12, Section 2.3. The process associated with the sludge drying bed should be described. The management of all waste streams should be identified. X

Line 1, Paragraph 1, Page 13, Section 2.4. The application should describe how the oil from the compacted filters is recovered. Item 2.4

Part I-C.5a (Waste Analysis Plan - Separate Document) (attached 4)

The waste analysis plan should be a specific section of the application.

The plan must include a description of the sampling frequency, sampling methods, and parameters to be identified. ✓

The fingerprinting procedures for shipments arriving at the facility must be described. ✓

The description of the sampling plan for out going materials must include sampling frequency, sampling method, and parameters to be identified. Additionally, the plan presented indicates that product knowledge will be used to make the on/off specification determination. The application must describe the basis for using product knowledge, and how this information is updated. ✓

The following items are specific comments on the plan as presented.

Part (a)

How are the test results recorded? ✓

How are the test results related to a specific sample, truck and customers that contributed to the materials on the truck? ✓

How and where are the test results maintained? ✓

Part (b)

What sampling device is utilized to obtain the core sample? ✓

How are the test results associated with a specific tank, and with truck loads that are removed from that tank between sampling? ✓

What is the basis for the use of "product knowledge" as a basis for on-specification used oil fuel determination? How is this information recorded? How frequently is this information updated? X

Where are the before and after samples taken and what parameters are identified in the analysis? X

What is the monthly composite? Where are the samples taken? What size samples are taken? What is the criteria used to select the tanks to be sampled?

Section 3, Standard Operating Procedures, contains some information regarding the prequalification process, the driver responsibilities when picking up a shipment of used oil from the customer, and sampling of the shipment at the Howco facility. The following question relate to Section 3.

The application must include an example of the waste profile sheet. X

The description of prequalification procedures indicates that sampling results for each waste stream should be available at Howco. The application should discuss the retention and availability of the sampling test results. X

The description of driver responsibilities at the customer does not include the actions the driver will take should the second test indicate the presence of unacceptable halogen contamination. The description should describe the specific EPA test method to be use in the second test for a shipment that fails the physical inspection and sniffer test. ✓

How are the samples of non-Howco transported shipments identified, what parameters are identified in the testing, and how are the records managed? X

The application indicates that manifest are prepared upon receipt of the waste. The application should define what 'receipt' means (pick-up from the generator, arrival at the facility, etc.). The application should include an example of the transportation document, and how this document is managed. X

Part I-C.5b (Attachment 5)

The application must include a detailed plan for the management of the solids (those generated on site and those received from off site) at the facility. This plan must include detailed descriptions of the processes and equipment used, the sampling plan to determine the waste classification of the byproducts, and details of the disposal of all waste streams.

Part I-C.5c (Attachment 6)

The application must include a description of the used oil tracking plan. The description must include a copy of the 'typical' form used to track the movement of used oil into and out of the facility, and a records retention policy.

Part I-C.6 (Preparedness and Prevention) (Attachment 7)

The application did not indicate where the information required to satisfy the requirements of this part was located within the SPCC&C. Some of the information is available in various locations within the SPCC&C but should be consolidated into a specific location.

- Item 6.e The inspection, testing and maintenance of the emergency equipment is not discussed.
- Item 6.f Access to communication devices at all times is not discussed.
- Item 6.i Arrangements with local authorities is incomplete. The application must describe the actions Howco has taken to familiarize local authorities with the facility and its preparedness, prevention and emergency response procedures. The description must include how the facility will manage the records of this familiarization.

Specific questions on items related to facility preparedness and prevention.

Line 2, Paragraph 3, Section 4.1, Page 17. The application must justify the statement that the containment walls around the tanks are impervious to oil and water. X

Page 31, Section 6.2. Are drivers required to be present when loading and unloading trucks and or containers? What type of communication is available to the drivers during unloading and unloading operations? Are loading or unloading operations conducted with only the driver present at the facility? X

Page 23, Section 5. The definitions of spill classification on this page are different from the definitions on page 34, Section 6.5. Additionally, the page indicates that three definitions are used but only two are presented. ✓

Line 1, Paragraph 1, Page 37, Section 8.1. The containment and control program could not be located in the SPCC&C. ✓ Item 3.2

Paragraph 1, Page 51, Section 10.1. As described, the only incident requiring a written report would be a release of oily material that leaves the property. The reporting requirements of 62-710 FAC, 62-762 FAC, and 40 CFR 279 should be review to determine when a spill or release must be reported, and the application revised as necessary. X

Part I-C.7 (Contingency Plan) *continued 5*

The contingency plan as presented does not include all the information requested in the instructions for completion of the application. The information not identified and specific questions of the information in the contingency plan are identified in the following comments.

- Item 7.a The application only presents the specific actions to be taken by the Incident commander in response to fire and explosions. Action to be taken by other employees must be included.
- Item 7.b The description of the emergency response arrangements is not presented.
- Item 7.c The qualifications of the emergency response coordinators is not presented.

- Item 7-e The plan includes a list of equipment available during an emergency, but does not describe the capabilities of the equipment nor is the location of the spill response equipment identified on a facility map.
- Item 7.f The location of tanks and containers specifically dedicated for the storage of spill or released materials is not identified.
- Item 7.h The facility evacuation routes are identified on Drawing D-8-2. The amount of information contained on this drawing makes it difficult to quickly and easily identify the evacuations routes. The application does not indicate that the evacuation routes are posted in the plant and should be revised to indicated where copies of the evacuation routes will be posted.

This plan does not specify where copies of the plan will be maintained at the facility, and does not describe the conditions that will require modification of the plan.

Part I-C.8 (Unit Management)

Containers (Section 7)

The application does not describe, nor clearly indicate on a facility map, the location of the container storage area. This description should include details of construction, engineering drawings with cross section, and the features that make the area impervious to water and used oil.

The application does not include the inspection checklist used to inspect the container storage area(s), and record any corrective action taken or needed to be taken.

Paragraph 1, Page 35, Section 7. This paragraph states that 85 gallon (or smaller) containers will be used to manage sludge, wasted handling and storage. This statement indicates that these materials are not managed in one ton totes, rolloffs, trucks and other devices. This section should be revised as necessary.

Tanks (No specific section)

Table 2-1, Page 8, Section 2. This table identifies the tanks at the facility, but does not provide any information on the materials of construction or construction specifications. The application must describe the aspects of the tanks that demonstrate how the tanks comply with the requirements of 62-762.500(3)(d), (e), and (f) FAC.

The application must describe the piping system and how it complies with 62-762.500(4) FAC. The application must describe the secondary system and how it complies with 62-762.500(6) FAC. The application must describe the tank maintenance procedures and how repairs will be made in accordance with 62-762.700 FAC.

The inspection plan presented in Section 13 is a conceptual view of the safety program for the facility. The inspection plan should include the forms used by the inspectors to detect the safety hazards discussed in the application and the specific equipment and operational systems to be inspected. The inspection forms should include any observations made during the inspection and the actions necessary to correct deficiencies detected during the inspection.

The application must describe the management of rain water that accumulates in the secondary containment areas at the facility.

Part I-C.9 (Closure Plan - Separate Document)

The application identified the tanks at the facility to be closed, but did not identify the other areas that will be closed.

The application did not describe the sampling to be conducted to document that decontamination of the unit management areas had been successful. The description should include specific sampling methods, sampling parameters, and analytical methods. The discussion of samples and sample location could be summarized in table form to ensure that the specific samples identified are all described.

The disposal of solids generated during the closure was not discussed in the closure plan.

The closure plan does not discuss soil sampling at the facility. The application must include a discussion of the soil sampling plan and additional actions the facility will take should contaminated soils be identified during the soil sampling.

Part I-C.11 (Training - 11)

The training plan identifies the contents of the training to be presented to the employees. The application should describe the specific regulatory rules that the training plan is designed to address.

Paragraph 3, Page 55, Section 11. The amount of time dedicated to Phase Two training must be identified.

The application should describe the formal aspects of the hands on training that provide the necessary training to the employees.

The application must describe the records used to document employees training and how these records will be managed.

The application should describe the management actions necessary to revise the training program to address regulatory changes.



Department of Environmental Protection

Lawton Chiles
Governor

Southwest District
3804 Coconut Palm Drive
Tampa, Florida 33619

Virginia B. Wetherell
Secretary

SITE INSPECTION REPORT

OWNER/OPERATOR: Mr. Lynn LeMasters (HOWCO)
MAILING ADDRESS: 843 43rd Street South
St. Petersburg, Fl. 33711

NAME OF SITE: HOWCO Solid Waste Processing Facility
SITE ADDRESS: same as above
CITY: St. Petersburg, Fl.

INSPECTION

DATE: January 9, 1998

PERMIT NO: none

REASON FOR VISIT:

- COMPLIANCE INSPECTION X
- PERMITTING INSPECTION X
- COMPLAINT INVESTIGATION

PERSONS PRESENT: Susan Pelz, Robert Butera, Bill Crawford, Roger Evans (FDEP), Lynn LeMasters (HOWCO)

SUMMARY REPORT: The purpose of this site visit was to assess the activities at the site with respect to the applicability of solid waste permitting.

Mr. LeMasters accompanied us throughout the site inspection. The site has an industrial wastewater treatment plant (discharge permitted by City of St. Petersburg?) in the east part of the site. The effluent from the treatment plant is discharged to the City of St. Petersburg POTW. This treatment plant includes several storage and process tanks which are also part of the used oil processing facility. A central collection system runs east-west through most of the site. Runoff from the paved areas (most of the site is paved) is collected in this collection system which flows from east to west to an oil/water separator/sump located at the west-central portion of the site. This runoff is "inspected" prior to ultimate discharge to the stormwater system. The sump inside the property discharges to an oil/water separator located just outside the south wall. This outside separator then discharges to the stormwater drain. Mr. LeMasters indicated that the sumps (oil/water separators) are valved, and runoff does not automatically discharge.

We observed the oil filter crushing operation. A trench drain exists south of the main site collection system. The south trench collects oil and oily waters from the oil filter crushing operation, the truck wash and the filter press. This oil/oily water collects in a sump (at the south-central part of the site) and is pumped to the wastewater treatment plant onsite.

We observed several drums stored along the south wall. Some drums were labeled "Non-Hazardous Waste," some were labeled "Waste Oil Absorbent Pads and Absorbent" and "Danger Hazardous Material." One of the drums from Grayco Environmental was opened. This drum contained "filter lint" reportedly from a used oil processing facility. Several cardboard drums were observed. These drums were from Florida Silica and Sand. A couple of these drums were opened, and they contained a fine white powder. The labels indicated that the material was an abrasive media (i.e. like sandblast grit). A few gray drums from Valcool were observed. These

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drums reportedly contained a blue cutting fluid concentrate, although Mr. LeMasters could not verify this. Six yellow overpack drums were also observed. These drums reportedly contained oily wastes. The contents of these drums were not verified during our site inspection. All of these drums were stored in an area marked "Oil Filters." We discussed the presence of these materials at the site. These solid waste materials should not be at the site or should be managed pursuant to a solid waste management facility permit (assuming the materials are non-hazardous). Mr. LeMasters indicated that he did not know why some of the materials (e.g. abrasive media, "virgin" blue cutting fluid, etc.) were onsite.

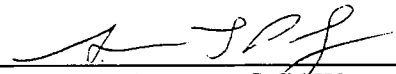
We then went to the southwest corner of the site. We observed 3 "bays" where semi-solids and sludges were being solidified. We observed a cyclone separator (decanter), and a pile of "clean" soil. One of the piles of solids had a significant number of oil filter rings. Mr. LeMasters explained that the solids which accumulate in the sumps, solids produced by the "decanting" activity, and solids generated from the wastewater treatment plant are placed in the "bays" and soil, or other materials are added to solidify the materials. He indicated that some materials are sent to landfills for disposal, and some materials are sent to soil thermal treatment facilities for disposal. We observed significant ponded water within one of the "bays". The area has a 6-foot concrete wall around the south and west sides. The south wall extends east for approximately 200 feet. We walked around the outside of the wall and observed several locations of significant seepage of oily material through the wall. In some locations, the material had obviously impacted (stained) the soil in the vicinity. The south wall has a major horizontal crack, and may present a potential significant failure, and discharge to the environment. Other cracks were also observed in the wall. Mr. LeMasters explained that the wall had recently been re-sealed. However, some of the leakage was obviously fresh (still liquid, not just staining). The entire solid waste processing area is uncovered. It appears that the liquids from this area are intended to discharge to the south trench drain. However, the solid (or solidified) materials are tracked out of the area by equipment, and it appears that liquid which contact these materials will discharge to the main collection system (ultimately to stormwater).

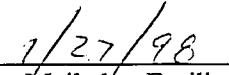
We then proceeded to the northwest part of the site. Equipment and empty containers are stored in this area. This area is not paved. The property adjacent to the north appears to have a machine repair business. Several areas of significantly stained soils (apparently gasoline or oil) were observed along the north property boundary.

We concluded our inspection by observing the wastewater treatment plant, and then going outside the facility to observe the stormwater drain which receives discharges from the facility. We observed the oil/water separator just outside the south wall, and then we went to observe the stormwater pipe discharge at a nearby park. It should also be noted that the facility has several groundwater monitoring wells onsite (a couple of which we saw during our visit). These groundwater monitoring wells were installed as part of a previous tank closure(?). Due to time constraints, we did not review any records during this site inspection.

DEFICIENCIES NOTED: Operating a solid waste management facility without the proper permit.

RECOMMENDATIONS: The owner/operator should cease accepting, processing and otherwise managing solid wastes. The owner/operator should remove and properly dispose of the solid waste materials. Solid wastes are those materials which are not specifically regulated pursuant to Chapter 62-710, F.A.C. or 40 CFR 279.

FDEP REPRESENTATIVE: 
Susan J. Pelz, P.E. Solid Waste Section


Date Mailed to Facility

cc: Tim Hagen, HOWCO, 843 - 43rd St. South, St. Petersburg, Fl. 33711
Deb Bush, Pinellas County, 3095 - 114th Ave. N., St. Petersburg, Fl. 33716
Bill Crawford/Roger Evans, RCRA- FDEP Tampa
Randy Strauss, RCRA- FDEP Tampa

528624557

State of Florida, Department of Environmental Protection (DEP)
 Pollutant Storage Tank Inspection Program, implemented by the:
 Pinellas County Public Health Unit (PCPHU), Engineering Division
 4175 East Bay Dr. Clearwater, FL 34624-6966
 Inspection Report-Cover Page

RECEIVED
 JUN 23 1997
 Department of Environmental Protection
 SOUTHWEST DISTRICT
 BY _____ Page 1 of 3

528624557

HOWCO ENVIRONMENTAL SERVI
 843 43RD ST S LAT/LONG: 27:45:47 / 82:41:32
 SAINT PETERSBURG FL
 (813)327-8467 DATE ENTERED: 29-APR-86

FACILITY STATUS: OPEN

33711-1922 FACILITY TYPE: C / Fuel User/Non-Retail
 OPER: TIM HAGAN

ACCOUNT OWNER : HOWCO ENVIRONMENTAL SVCS 3701 Central Ave SAINT PETERSBURG FL 33713
 (813)327-8467 CONTACT: TIM HAGAN

TANK OWNER : HOWCO ENVIRONMENTAL SVCS 3701 Central Ave SAINT PETERSBURG FL 33713
 (813)327-8467 CONTACT: TIM HAGAN

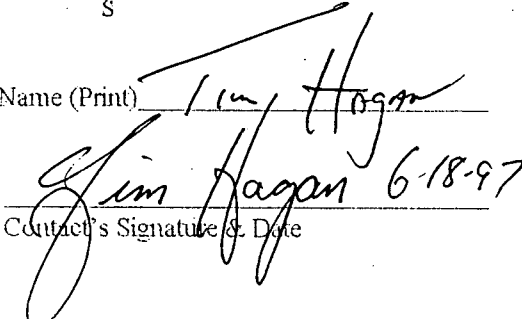
Tank #	Product	Size	Status	Status Date	Install Date	Position	Fee Y/N	CONSTRUCTION		
								Tank	Monitor	Pipe
1	Leaded Gas	2000	B	30-JUN-86		A	N	D	I	C
100	Waste Oil	29500	U		07/1980	A	Y	A	M	B
								C		I
								K		
101	Waste Oil	28500	U		07/1980	A	Y	A	M	B
								C		I
								K		
105	Vehicle Diesel	14000	U		07/1980	A	Y	C	M	B
								K		I
								M		
106	Waste Oil	9870	U		07/1980	A	Y	C	M	B
								K		I
								M		
120	Waste Oil	21775	U		07/1980	A	Y	A	M	B
								C		I
								K		
121	Waste Oil	27989	U		07/1980	A	Y	A	M	B
								C		I
								K		
122	Waste Oil	27989	U		07/1980	A	Y	A	M	B
								C		I
								K		
123	Waste Oil	27989	U		07/1980	A	Y	A	M	B
								C		I
								K		
124	Waste Oil	27989	U		07/1980	A	Y	A	M	B
								C		I
								K		
125	Waste Oil	18040	U		07/1980	A	Y	A	M	B
								C		I
								K		
								S		

Inspection Type: ROUTINE AST ATCI

Inspector Name & #: Ernest Roggelin (813) 538-7277 ext. 136

Contact Name (Print) Tim Hagan

Inspector's Signature & Date
 6-18-97

Contact's Signature & Date
 6-18-97

State Florida, Department of Environmental Protection (DEP)
 Pollutant Storage Tank Inspection Program, implemented by the:
 Pinellas County Public Health Unit (PCPHU), Engineering Division
 4175 East Bay Dr. Clearwater, FL 34624-6966
 Inspection Report-Cover Page

528624557

HOWCO ENVIRONMENTAL SERVI

FACILITY STATUS: OPEN

Page 2 of 3

843 43RD ST S LAT/LONG: 27:45:47 / 82:41:32

SAINT PETERSBURG FL

33711-1922 FACILITY TYPE: C / Fuel User/Non-Retail

(813)327-8467 DATE ENTERED: 29-APR-86

OPER: TIM HAGAN

Tank #	Product	Size	Status	Status Date	Install Date	Position	Fee Y/N	CONSTRUCTION		
								Tank	Monitor	Pipe
126	Waste Oil	18565	U		07/1980	A	Y	A	M	B
								C		I
								K		
127	Waste Oil	18565	U		07/1980	A	Y	A	M	B
								C		I
								K		
128	Waste Oil	23792	U		07/1980	A	Y	A	M	B
								C		I
								K		
129	Waste Oil	21775	U		07/1980	A	Y	A	M	B
								C		I
								K		
140	Waste Oil	26041	U		07/1980	A	Y	A	M	C
								C		K
								K		M
141	Waste Oil	17432	U		07/1980	A	Y	A	M	C
								C		K
								K		M
142	Waste Oil	17432	U		07/1980	A	Y	A	M	C
								C		K
								K		M
143	Waste Oil	17013	U		07/1980	A	Y	A	M	C
								C		K
								K		M
144	Waste Oil	18886	U		07/1980	A	Y	A	M	C
								C		K
								K		M
150	Waste Oil	15000	U		07/1980	A	Y	A	M	C
								C		K
								K		M
151	Waste Oil	15000	U		07/1980	A	Y	A	M	C
								C		K
								K		M
152	Waste Oil	28130	U		07/1980	A	Y	A	M	C
								C		K
								K		M
153	Waste Oil	20531	U		07/1980	A	Y	A	M	C
								C		K
								K		M
154	Waste Oil	18172	U		07/1980	A	Y	A	M	C
								C		K
								K		M
155	Waste Oil	20139	U		07/1980	A	Y	A	M	C
								C		K
								K		M
160	Waste Oil	14792	U		07/1980	A	Y	A	M	C
								C		K
								K		M
161	Waste Oil	14792	U		07/1980	A	Y	C	M	B
								K		I
								M		

Stat Florida, Department of Environmental Protec (DEP)
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528624557

HOWCO ENVIRONMENTAL SERVI
 843 43RD ST S LAT/LONG: 27:45:47 / 82:41:32
 SAINT PETERSBURG FL
 (813)327-8467 DATE ENTERED: 29-APR-86
 OPER: TIM HAGAN

FACILITY STATUS: OPEN

Page 3 of 3

33711-1922 FACILITY TYPE: C / Fuel User/Non-Retail

Tank #	Product	Size	Status	Status Date	Install Date	Position	Fee Y/N	CONSTRUCTION		
								Tank	Monitor	Pipe
162	Waste Oil	14792	U		07/1980	A	Y	C	M	B
								K		I
								M		
163	Waste Oil	14792	U		07/1980	A	Y	A	M	C
								C		K
164	Waste Oil	18832	U		07/1980	A	Y	K		M
								A	M	C
								C		K
165	Waste Oil	18618	U		07/1980	A	Y	K		M
								A	M	C
								C		K
166	Waste Oil	15000	U		07/1980	A	Y	K		M
								A	M	C
								C		K
170	Waste Oil	11000	U		07/1980	A	Y	K		M
								A	M	C
								C		K
171	Waste Oil	9607	U		07/1980	A	Y	K		M
								A	M	C
								C		K
172	Waste Oil	9703	U		07/1980	A	Y	K		M
								A	M	C
								C		K
173	Waste Oil	5500	U		07/1980	A	Y	K		M
								A	M	C
								C		K
174	Vehicular Diesel	2898	A	01-JAN-90	07/1980	A	N	K		M
								A	M	C
								C		K
180	Waste Oil	56796	U		07/1980	A	Y	K		M
								A	M	C
								C		K
2	Vehicular Diesel	4000	B	30-JUN-86		A	N	K		M
								D	I	C
3	Vehicular Diesel	3000	T	01-DEC-94	07/1987	A	Y	A	B	D
								E	C	
								K	E	

ITEM #32: REFER TO 5-15-96 INSPECTION NOTES
 & SUBSEQUENT CORRESPONDENCE REGARDING
 CONTAINMENT WALLS & FLOORS. THESE
 STRUCTURES ARE TO MEET 1999 SECONDARY
 CONTAINMENT STANDARDS



Name: HOWCO Environmental Sv
 Facility I.D.#: 528624557
 Date: 6-18-97

ABOVEGROUND STORAGE TANK
COMPLIANCE INSPECTION FORM

Yes No Unk N/A

I.	REGISTRATION/NOTIFICATION: Comments:		Yes	No	Unk	N/A
1.	Facility has registered all applicable tanks on site; 62-762.400	1.	X			
2.	Current registration placard is properly displayed; 62-762.410 (6)	2.	X			
Proper notification has been made for the following; 62-762.450:						
3.	Abandonment and closure (30 days prior); (1) (a)	3.				X
4.	Change of ownership (30 days after); (1) (b)	4.				X
5.	Retrofitting, replacement or upgrading; (10 days prior); (1) (c)	5.				X
6.	Change of tank status (in service/out of service); (1) (d)	6.				X
7.	Change of facility status (e.g. substances stored); (1) (e)	7.				X
8.	Change of method of financial responsibility (within 30 days); (2)	8.				X
9.	The facility owner/operator notified D.E.R. of internal tank inspection 24 hrs prior to the test; (3)	9.				X
10.	Loss of greater than 100 gallons on an impervious surface or 500 gallons inside secondary containment within one working day; .450 (4)	10.				X

II.	RECORDS KEEPING: Comments: <u>All reflects 10-16-96 inspection report. Change in part of release detection process.</u>		Yes	No	Unk	N/A
11.	All records were maintained for two (2) years and were available for inspection within five (5) working days; 62-762.710	11.		X		
12.	Some, but not all records were maintained for two (2) years and were available for inspection within five (5) working days; 62-762.710	12.	X			

III.	REPORTING/DISCHARGE RESPONSE/ REPAIRS: Comments:		Yes	No	Unk	N/A
Proper reporting requirements met for the following; 62-762.460:						
13.	Integral piping tightness test failure within 10 days; (1)	13.				X
14.	Pollutant discharge exceeding 25 gallons on a pervious surface; (2)	14.				X
15.	Positive response of a release detection device within one working day; (3)	15.				X
The owner or the operator of the system which has discharged has:						
16.	Taken it out-of-service; 62-762.700 (1), had it repaired or replaced; .700, or properly closed it; .800	16.				X
17.	Removed any regulated substances from the system; 62-762.820 (1)	17.				X
18.	Tightness tested all repaired components before placing them back in service; 62-762.700 (5) & (6)	18.				X
19.	Begun initial corrective actions for a release; 62-762.820 (2)	19.				X

IV.	INVENTORY REQUIREMENTS FOR TANKS IN CONTACT WITH THE SOIL: Comments:		Yes	No	Unk	N/A
20.	All inventory requirements maintained in accordance with 62-762.720 (1)	20.				X
21.	Some, but not all inventory requirements maintained in accordance with 62-762.720 (1)	21.				X



Name: Hornes Environmental Svc
Facility I.D.#: 528624557
Date: 6-18-97

ABOVEGROUND STORAGE TANK
COMPLIANCE INSPECTION FORM

Yes No Unk N/A

V.	PERFORMANCE STANDARDS/CATHODIC PROTECTION: Comments:		Yes	No	Unk	N/A
	Storage tank criteria; 62-762.500					
	22. Meets construction upgrading schedule; .510 and .520	22.				
	23. Meets applicable storage tank standards; (1), (2) & (3)	23.	X			
	24. Tank has secondary containment system; 500 (6)	24.	X			
	25. Tank equipped with overfill protection; (3) (f) 1-4, (g)	25.				X
	Piping criteria					
	26. Meets new piping standards with secondary containment; 500 (4) & 600 (4)	26.				X
	27. Meets construction upgrading schedule; 62-762.510 (3) , & .520 (2)	27.				X
	Repairs to storage tank systems; 62-762.700					
	28. Failed storage tank system component properly required; (1)-(4)	28.	X			
	29. Tightness testing of the required component prior to being brought back into service; (5)	29.	X			X
	Cathodic Protection; 62-762.730					
	30. Cathodic protection system for tank and piping provides continuous protection; (1)-(4)	30.				X
	Secondary containment; 62-762.500					
	31. Does containment are have sufficient volume; 500 (6) (a) (2)	31.	X			
	32. Is the containment area made out of impervious material in accordance with Chapter 62-762, F.A.C., requirements; (6) (a) (1)	32.		X		
	33. Is the containment area equipped with drainage system or protected from accumulation of rain; (6) (a) (3)	33.	X			
	34. Hydrant pits equipped with spill prevention equipment; (5)	34.				X

VI.	RELEASE DETECTION/MONITOR WELLS: Comments: <u>Monthly visual. & annual line pressure test</u>		Yes	No	Unk	N/A
	35. Facility has an approved released-detection system; 62-762.600 & 62-762.860	35.	X			
	36. Monitoring wells properly designed, constructed and installed; 62-762.640 or 62-762.600 (6)	36.				X
	37. Interstitial monitoring adequate to detect a release from integral piping; 62-762.600 (4) & (5)	37.				X

VII.	OUT-OF SERVICE STATUS: Comments:		Yes	No	Unk	N/A
	38. Are the corrosive protection devices properly maintained; 62-762.800 (1) (a)	38.				X
	39. Is the vent line and other ancillary equipment properly secured and maintained; (1) (b)	39.				X
	40. Test performed to insure the integrity of out-of-service system prior to being returned to service; (1) (c)	40.				X

VIII.	VARIANCE: Comments:		Yes	No	Unk	N/A
	41. Has the facility for an Alternate Procedure; 62-762.850 (1)	41.				X

IX.	OTHERS: Comments:		Yes	No	Unk	N/A
	42. Any other violation noted during inspection (Explain in comments)	42.				X



Department of Environmental Protection

Lawton Chiles
Governor

Southwest District
3804 Coconut Palm Drive
Tampa, Florida 33619

Virginia B. Wetherell
Secretary

APR 11 1997

Mr. Tim Hagan
Howco Environmental Services
3701 Central Ave.
St. Petersburg, FL 33713

RE: WARNING LETTER #100547

Howco Environmental Services
843 43rd St. S.
St. Petersburg, FL
EPA ID NO.: FLD 152 764 767

Dear Mr. Hagan:

The purpose of this letter is to advise you of possible violations of law for which you may be responsible, and to seek your cooperation in resolving the matter. A hazardous waste program field inspection conducted on October 16 & 17, 1997, indicates that violations of Florida Statutes and Rules may exist at the Howco Environmental Services facility. Department of Environmental Protection personnel made observations described in the attached inspection report. Section 11 of the report lists a summary of alleged violations of Department Rules.

Section 403.727 Florida Statutes provides that it is a violation to fail to comply with rules adopted by the Department. The activities observed during the Department's field inspection and any other activities at your facility that may be contributing to violations of Florida Statutes or Department Rules should be ceased.

You are requested to contact Randall Strauss at (813)744-6100, ext. 387, within fifteen (15) days of receipt of this Warning Letter to arrange a meeting to discuss this matter. The Department is interested in reviewing any facts you may have that will assist in determining whether any violations have occurred. You may bring anyone with you to the meeting that you feel could help resolve this matter.

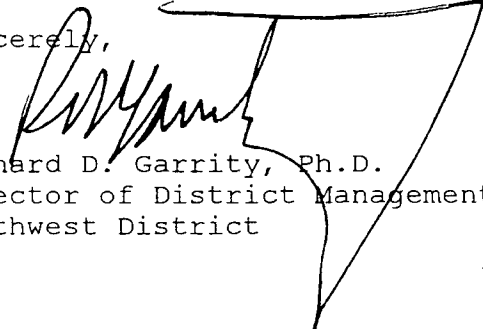
Please be advised that this Warning Letter is part of an agency investigation, preliminary to agency action in accordance with Section 120.57(4), Florida Statutes. If after further investigation, the Department's preliminary findings are verified, this matter may be resolved through the entry of a Consent Order which will include a compliance schedule, an appropriate penalty, and reimbursement of the Department's costs and expenses. In accordance with the Department's Settlement Guidelines for Civil Penalties and the RCRA Civil Penalty

Howco Environmental Services
Warning Letter #100547

APR 11 1997

Policy of 1990, a civil penalty has been calculated and is pending review. Costs and expenses in this case will be a minimum of \$100.00. If this matter cannot be resolved within 90 days, under the Department's agreement with the United States Environmental Protection Agency (EPA), a formal administrative complaint or "Notice of Violation" (NOV) must be issued against you within 150 days of the date of the attached inspection report. We look forward to your cooperation in completing the investigation and resolution of this matter.

Sincerely,



Richard D. Garrity, Ph.D.
Director of District Management
Southwest District

RDG/rhs

Enclosure

cc: Panduranga Ojili, HWR
Jewell Grubbs, USEPA, Region IV
Charlie Ryburn, Pinellas Co. DEM
Compliance File



Department of Environmental Protection

Lawton Chiles
Governor

Southwest District
3804 Coconut Palm Drive
Tampa, Florida 33619

Virginia B. Wetherell
Secretary

HAZARDOUS WASTE INSPECTION REPORT

1. INSPECTION TYPE: COMPLAINT ☒ ROUTINE FOLLOW-UP PERMITTING
FACILITY NAME: Howco Environmental Services DEP/EPA ID FLD 152 764 767
STREET ADDRESS: 843 43rd Street South, St. Petersburg, FL
MAILING ADDRESS: 3701 Central Ave., St. Petersburg, FL 33713
COUNTY: Pinellas PHONE: (813)327-8467 DATE: October 16-17, 1996 TIME: 9:00

NOTIFIED AS:

 Non Handler
 CESQG (<100 kg/mo.)
 SQG (100-1000 kg/mo.)
 Generator (>1000 kg/mo.)
 Transporter
 Transfer Facility
 Interim Status TSD Facility
 TSD Facility
Unit Type(s):
 Exempt Treatment Facility
☒ Used Oil

CURRENT STATUS:

 Non Handler Non-Notifier
 CESQG (<100 kg/mo.)
 SQG (100-1000 kg/mo.)
 Generator (>1000 kg/mo.)
 Transporter
 Transfer Facility
 Interim Status TSD Facility
 TSD Facility
Unit Type(s):
 Exempt Treatment Facility
☒ Used Oil

2. Applicable Regulations:

☒ 40 CFR 261.5 ☒ 40 CFR 262 40 CFR 263 ☒ 40 CFR 264 40 CFR 265
 40 CFR 266 40 CFR 268 40 CFR 273 ☒ 40 CFR 279
☒ 62-710 F.A.C. ☒ 62-730 F.A.C. 62-737 F.A.C. 62-740 F.A.C.

3. Responsible Official:

Tim Hagan, owner

4. Survey Participants and Principal Inspector:

Bill Crawford, Roger Evans, Randy Strauss-FDEP; Ernest Roggelin-Pinellas Co. HRS Storage Tank Program; Jose Rodriguez-Pinellas Co. DEM Air Program; Roy Williams-St. Petersburg Fire & Rescue/Prevention Division; Tim Hagan-Howco Environmental Services

5. Facility Latitude: 27°54'00" Longitude: 82°38'11"

6. SIC Code: 4953, 5172

7. Type of Ownership: FEDERAL STATE COUNTY MUNICIPAL PRIVATE

8. Permit No.: N/A Date Issued: Exp. Date:

9. Pre-Arranged Inspection: Yes No ☒

10. Facility Description:

This facility was last inspected by the Department's hazardous waste section in March 1994. The major processes and activities are the same as reported in previous inspections, i.e. used oil collection, processing and marketing; wastewater, sludge and soil treatment and disposal; used oil filter processing; hazardous waste brokering; emergency response waste recovery and disposal; and laboratory analytical services. The facility currently employs about 45 people at the oil processing/wastewater plant and the main office located at the mailing address identified above.

The handling of used oil filters has changed since the previous inspection in 1994, when filters were transported to the facility in 55-gallon drums, then emptied into a roll-off container prior to crushing. Howco now collects and transports filters in dedicated trucks in-bulk. The trucks dump the filters on a pad located at the southwest corner of the facility. Oil drains from the filters across the pad into an open trench. This trench extends approximately 300 feet along the edge of a concrete pad and collects used oil and contaminated stormwater run-off from—in addition to the filters—a soil/sludge waste pile, a cone-type sludge separator, spillage from filter crushing and waste drum handling, and the operation of a waste sludge filter press. The trench drains to a collection sump for a truck wash rack, which is then pumped through an underground pipe to tanks used for oil/water separation located in the wastewater treatment area. The details of construction of the pad in the bulk soil and oil filter drainage areas could not be determined due to being coated with a layer of oil/soil mixture. There was visible oil seepage through the mortar cracks of the concrete block wall enclosing the drainage area. After draining and crushing, the filters are transported as scrap in roll-offs to U.S. Foundry & Manufacturing, 8351 NW 93rd St., Medley, FL. Approximately 140,000 pounds of scrap filters were transported to U.S. Foundry during a two-week period prior to the inspection.

The management of the filters on the open pad constitutes a violation of Section 62-710.850(6), Florida Administrative Code (F.A.C.), which requires filters to be stored in labeled containers, protected from the weather on an oil-impermeable surface. The used oil drainage on the pad and in the trench constitute violations of similar requirements for used oil management by processors spelled-out at 40 CFR 279.54. These standards specify that used oil can only be stored in tanks, containers, or units regulated under hazardous waste-permitted facility requirements, and the units must be provided with secondary containment.

Located on the pad adjacent to the filters, a bulk soil/waste pile is used as an oil absorbent and media for mixture of various solid wastes managed at the facility. Wastes that are added to this pile include solids cleaned from the trench drain system described above, solids removed from a cone-type liquid/solid separator, solids from a vibratory filter used in the oil processing plant, filter press solids, spent absorbents and any other miscellaneous sludges or solid-phase wastes. The miscellaneous wastes include anything that can not be processed through the used oil or wastewater plants, and can be mixed homogeneously into the bulk pile.

October 1996

The cone separator is used for liquid/solids separation from tanker loads of oily wastes such as tank bottom, oil/water separator, sump and stormwater drain clean-outs. The liquids are processed through the oil and/or wastewater plants and the solids are added to the bulk pile. A pile of clean soil is located nearby and added as needed to the waste pile, which is periodically mixed and allowed to dry and drain to the trench. This waste had been disposed to Chambers Landfill up until April 1996, but the most recent disposal prior to this inspection was in September 1996, and went to Geologic Recovery Systems, Mulberry, FL, a soil thermal treatment facility. Treated soil from Geologic is the source of the clean soil described above that is used for mixing. Disposal of the bulk waste pile to Geologic constitutes a repeat violation of Section 403.413(4)(c), F.S., which Howco was previously cited for in conjunction with a February 19, 1993, Department inspection. The practice had apparently been discontinued after that citation until the most recent September 1996 disposal.

Prior to disposal, the bulk waste pile is mixed and a grab sample is taken for analysis for the parameters required by the disposal facility—either Chambers or Geologic. The method of waste determination for materials added to the pile received from off-site range from generator knowledge to full TCLP analysis, but include the customer's certification that the waste is non-hazardous. Several waste streams generated by Howco are also added to the bulk pile. The filter press sludge generated by Howco has been analysed at least three times in the past for TCLP constituents and was determined to be non-hazardous at those times. The cone separator solids, shaker filter solids and sand/carbon wastewater filter media have never been analysed at the point of generation, i.e. upon removal from the units. Due to the variety of sources contributing to these waste streams, a schedule should be implemented to analyse these solid wastes at the point of generation. The analyses should include all TCLP parameters likely to be present to ensure only non-hazardous wastes are added to the bulk pile before being mixed and diluted with clean soil.

Oil that contains between 6% and 20% water is distilled at 250°F to remove the water. At the time of inspection, modifications in the plant were underway to replace the distillation condenser. The former condenser utilized cooling water from a closed-loop water tower which was being replaced with a totally air-cooled unit. In addition to water, the condensate also contains enriched concentrations of halogenated compounds and "light ends" that distill over at this temperature. The condensate is routed to a storage tank where physical separation occurs between the aqueous and organic phases. The aqueous phase is routed for treatment in the wastewater plant and the "light ends" organic phase is mixed with processed oil and burned to provide heat for the distillation. Uncondensed vapor emissions from the condensate storage tank are routed through an approximate 30-gallon drum containing activated carbon. A waste determination consisting of TCLP analysis for organics must be performed on the spent carbon prior to disposal.

Since the organic phase of the condensate is derived from used oil and burned for energy recovery, it is regulated as "used oil" per 40 CFR 279.10(e)(2). In addition, even though the light ends can exceed 4000 ppm of halogens and thus be defined as "off-specification," Howco is

exempt from 40 CFR 279 Subpart G, standards for off-specification used oil burners, per 40 CFR 279.50(b)(3)(ii). Howco's air permit may specify other possible regulatory requirements pertaining to the burning of this material, which is to be determined by the Pinellas County DEM Air Program.

The used oil storage and processing tanks are located within two adjacent secondary containment areas. The western section contains 10 vertical tanks ranging from 20,000 to 30,000-gallon capacity which are used to store processed oil prior to shipment. The containment for these tanks consists of a concrete slab base surrounded by an asphalt-covered earthen berm. The eastern section contains tanks used for storage of incoming oil and processing tanks and equipment. The containment for this area consists of a concrete floor with concrete block walls. The Pinellas County Storage Tank Program has determined that these containment areas do not meet the standards for secondary containment specified at 62-762.500(6), F.A.C.; specifically, that the containments are not impervious to used oil for a number of reasons. These include cracks, holes and deterioration in the concrete base and walls, incomplete sealing of joints, and the asphalt berm does not meet the permeability rate standard of 1×10^{-7} cm/sec or less. Due to these deficiencies, the containments also do not meet the requirement located at 40 CFR 279.54(d)(2). The containments should be upgraded to meet all the 62-762.500, F.A.C., standards by June 23, 1997, when the facility's new Used Oil Processing Facility Permit application is due.

Tanks that are used for oil/water separation, burner fuel storage and untreated and treated wastewater storage and processing are located in a containment area generally referred to as the Wastewater Treatment Plant. This area is subdivided into four sections separated by concrete block containment walls. Several tanks in this area are subject to regulation as used oil tanks including: Tank #105 (15,000 gal) which is used for burner fuel storage; Tanks #140 and #141 (30,000 & 20,000 gals) which receive used oil collected in the trench and truck wash sump described above; and five tanks (18,000-20,000 gals) which are used for oil/water separation. Used oil separated in the latter tanks is pumped back into the oil plant for processing. Due to the storage and processing of various used oils and materials derived from used oil in these tanks, this secondary containment area is also subject to the requirements of 40 CFR 279 and Chapter 62-762, F.A.C. For the same reasons stated in the above paragraph, the containment for this area must be upgraded to meet the 62-762.500, F.A.C., standards by June 23, 1997.

The separated oil layers from tanks in the wastewater plant are discharged into the containment area. The oil is then pumped from sumps within the containment into the oil processing plant. The intentional use of the containment to handle used oil precludes its potential function as an emergency secondary containment. If the area is to be used in this manner, then the containment itself must be provided with secondary containment. The alternative is to manage the separated oil only in tanks that are provided with secondary containment.

Subsequent to the inspection, Howco pressure tested six 3" underground pipes used to convey oily wastes, wastewater and sludges between the two plants, from the truck wash sump to the separator holding tanks and

October 1996

from the wastewater plant to the sludge holding tank for the filter press. Two of the six lines failed, including a line between the two plants, Line #1, and the line from the wastewater plant to the sludge holding tank, Line #6. Due to failing the pressure tests, Howco submitted a Discharge Reporting Form to the Pinellas County Storage Tank Program on January 10, 1997, and subsequently reported that Line #2 was to be abandoned in place and that Line #6 was repaired. Documentation of a "passed" pressure test after the repairs on Line #6 should be submitted to the Department.

In addition to the permanent tanks that are identified on facility drawings and have been registered with the Department's storage tank program, Howco keeps approximately ten to fifteen tanker trailers on-site and leases portable tanks that are used for temporary storage of various wastes. Some of the tanker trailers are in-use for waste hauling, however several of them are not licensed for over the road use and are reportedly used for temporary overflow storage capacity. These tanks must also be provided with secondary containment if they are used for the storage of used oil for greater than 24 hours.

Field screening of oil is done by drivers on each pick-up using a "Multi-Gas Leak Detector" which the product literature states will detect HFCs, perchloroethylene, trichloroethylene and most other compounds containing halogens. The meter has a threshold setting that Howco's lab calibrates to trip when exposed to a standard they prepare from virgin oil and a chlorinated solvent. The standard is made at some concentration less than 1000 ppm halogen to provide a margin of error. If the meter is triggered when screening a used oil pick-up, then a sample is analysed by the driver in the field using a Dexsil® Clor-D-Tect® quantitative test kit. Howco's purchase records indicated that about 5 to 10 cases per month of the Dexsil® kits are used.

Currently, all or almost all of the processed oil is marketed as "on-specification" used oil fuel and a sequential number is assigned to each "batch" of fuel. Exactly what constitutes a "batch" of used oil fuel was not completely determined from the inspection, but appears to be associated with each time one of the ten 20,000 to 30,000-gallon storage tanks is filled. With oil being continually added and withdrawn from the tanks, exactly what constitutes a discrete batch and how the analyses correlate to each batch number is not clear. This procedure needs to be clarified in Howco's analysis plan, which simply states that a monthly composite sample is sent to an outside lab for verification of their product knowledge.

Each delivery of fuel to an oil burner is accompanied by a "Certificate of Analysis" that includes the batch number and results for arsenic, cadmium, chromium, lead, flash point and total halogen concentrations. The total halogens are run in Howco's lab by x-ray fluorescence. A review of total halogen results for 29 batches indicate that a unique determination was made for this parameter on each batch, because the result for each batch was different and varied by a considerable amount. The average total halogen concentration for the 29 batches was 608.5 ppm, with a low of 237 ppm and a high of 937 ppm.

All the flash point results are reported as >140F, which is based on generator knowledge that all past analyses have been significantly higher than 140F. The results for metals appear to be based on a

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monthly confirmatory analysis that is performed by an outside lab. The sample sent for outside analysis is a composite of all the samples taken by Howco during the month for total halogen analysis. The breakdown of lead results for the 29 batches reviewed as reported on the "Certificates of Analysis" is as follows: (20)56 ppm, (6)51 ppm, (2)56.5 ppm, and (1)39.8 ppm. Arsenic and cadmium are listed as <1 ppm on all analyses and chromium is listed as either 1 or 2 ppm. Since the lead results reported for the individual batches are not the result of a discrete analysis of each specific batch, they should not be reported as an actual analytical result on the "Certificate of Analysis." If Howco does not wish to analyse a representative sample of each batch, then they should propose a sampling plan with statistical data to support reporting the lead concentration as <X ppm, with a specified percentage certainty.

A review of records for a variety of incoming wastes revealed that Howco has received anti-freeze wastes that were determined to be hazardous due to exceeding TCLP limits. During the inspection, a record was observed for the receipt of anti-freeze from Tampa Volvo on 1/18/95 that analysed at 10 ppm lead by TCLP. Subsequent to the inspection, records were obtained in conjunction with an inspection of Ken Marks Ford, Clearwater, that showed Howco picked-up 260 gallons of anti-freeze on January 31, 1996, that was analysed in Howco's lab as containing 2.2 ppm tetrachloroethylene. Since these anti-freeze wastes were transported by Howco for treatment in their wastewater system, they were subject to regulation as solid wastes and as hazardous wastes due to exceeding the TCLP limits of 5 ppm for lead and 0.7 ppm for tetrachloroethylene, respectively.

A business sideline Howco is attempting to develop is the sale of their own brand of parts cleaner called Howco Klean, which the MSDS states contains 90% aliphatic and 10% aromatic petroleum distillates, 2% 1,2,4-trimethylbenzene and has a flash point of 143°F (TCC). Howco plans to pick-up the used solvent for processing in their oil treatment plant if an initial analysis from each customer determines the spent solvent to be non-hazardous. Testing of the spent solvent should include all the metal and organic TCLP constituents, except pesticides, and the flash point should be determined using one of the methods specified at \$ 261.21—not the method reported on the MSDS, Tagliabue Closed Cup (TCC).

Other miscellaneous activities include brokering of hazardous waste disposal which is usually arranged through Perma-Fix. A copy of all hazardous waste manifests is maintained in Howco's office. Fluorescent bulb disposal is brokered using Perma-Fix as transporter and Quicksilver, Tampa, as the recycling facility. Laboratory analytical services are performed on a job basis as well as for wastes picked-up by Howco.

A review of additional required records indicated that training records were complete and up-to-date. The Used Oil Annual Reports for '93, '94 and '95 were reviewed and revealed discrepancies that have not been explained as of the date of this report. All the used oil is reported on the '94 and '95 reports as being "Marketed for an industrial process." No oil is reported to have been "Marketed as an on-spec fuel," even though this is the stated disposition of all of Howco's used oil in 1995, and almost all of it in 1994. The 1993 report states

that 1,851,395 gallons was marketed as fuel or used in an on-site burner, and 1,015,803 gallons was marketed to the phosphate industry for use in flotation. The '94 report states that 13,688 gallons of used oil was used for phosphate flotation. Howco's Annual Reports need to be corrected to indicate the amounts of used oil marketed as on-spec fuel, if this is in fact the disposition of the oil.

The facility maintains an SPCC and Contingency Plan that was most recently updated in January 1996. Although the plan states that the local police and fire departments have been familiarized with the facility, there is no description of any arrangements with these agencies in the plan, as specified at § 279.52(b)(2)(iii), nor is there documentation of submittal of the plan to these authorities. The plan identifies the location of portable fire extinguishers on a drawing, but describes the location of spill control and other emergency equipment as being in the "HazMat trailer." It's not clear whether this refers to the same equipment Howco uses for off-site emergency response, which would therefore not always be available at the facility. The plan needs to be clarified to show the exact location of this trailer if it is permanent, and all locations of spill control materials and safety equipment other than just the fire extinguishers. All other records reviewed which included safety inspections, tank inspections, incoming waste profiles and analyses (except those violations noted above), and bulk waste analyses were in order. The following violations were identified as a result of the inspection and subsequent follow-up investigation.

11. Summary of Alleged Violations:

- | | |
|--|--|
| 40 CFR 262.11 | Failure to determine if solid wastes added to the bulk pile meet the definition of hazardous waste at the point of generation. |
| 40 CFR 263.20 &
403.727(3)(b)5., F.S. | Failure to use a manifest in the transportation of hazardous waste anti-freeze. |
| 40 CFR 279.52(a)(1) | Failure to maintain and operate the facility to minimize the possibility of a release of used oil to the soil. |
| 40 CFR 279.52(b)(2)(iii)&(iv) | Failure to describe arrangements with local authorities and locations of all emergency equipment in the contingency plan. |
| 40 CFR 279.52(b)(3)(ii) | Failure to submit copies of contingency plan to local police, fire, hospital and emergency response teams. |
| 40 CFR 279.54(a) | Failure to store used oil in tanks, containers or other regulated units. |
| 40 CFR 279.54(c) | Failure to provide impervious secondary containment for containers of used oil. |
| 40 CFR 279.54(d) | Failure to provide impervious secondary containment for existing aboveground tanks. |


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- | | |
|--------------------------|--|
| 62-710.850(6)(a), F.A.C. | Failure to store used oil filters in sealed, labeled containers on an oil-impermeable surface. |
| 403.413(4)(c), F.S. | Disposal of wastewater treatment sludge at a soil thermal treatment facility in violation of Department rules. |
| 403.727(3)(b)1., F.S. | Transportation of hazardous waste to an unpermitted facility. |
| 403.727(3)(b)2., F.S. | Storage, treatment and disposal of hazardous waste at an unpermitted facility. |

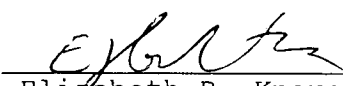
12. Recommendations:

- a) Revise the analysis plan to include a detailed description of the processed oil sampling procedures and a statistical method of determining the maximum lead content of the processed oil batches.
- b) Do not report results from monthly composite sample lead analyses as actual analytical results on the "Certificate of Analysis."
- c) Provide results of pressure test on repaired Line #6.
- d) Provide information regarding current practices for the disposition of the "light ends."
- e) Provide clarification regarding the disposition of used oil marketed in 1994 and 1995.

Inspected: _____


Randall H. Strauss
Environmental Specialist II

Approved: _____


Elizabeth B. Knauss
Environmental Manager

Date: _____

4/2/97

USED OIL PROCESSOR CHECKLIST

Facility Name: Howco Date: 10/17/90
Facility Representative: Tim Hagan Facility ID: ↑
Inspector: R. Strauss Registration # FLD 152764767

40 CFR 279 Subpart F -- Processor Standards

1. Is the facility exempt under any of the following? (279.50(a)) Y ☐ N ☒
Transporter or burner processing incidental to normal course of operations? Y ☐ N ☐
Processors who also generate, transport, market, dispose or burn used oil must comply with the applicable Subparts of Part 279.
2. Does the processor have an EPA ID Number? (279.51(a)) Y ☒ N ☐
3. Is the processor Registered? (62-710.500(1)(b)) Y ☒ N ☐
4. Does the processor have a general permit? 62-710.800(1)) Y ☒ N ☐
5. For new facilities, was the notification of intent to use the general permit submitted 30 days prior to beginning operation? For existing facilities, was the notification for renewal submitted 30 days prior to expiration of the general permit?(62-710.800(2)) Y ☐ N ☐ N/A

Oil Filter Processing Standards-- 62-710.850 F.A.C.

1. Does the facility process used oil filters by removing oil, draining, crushing or element separation? Describe in narrative. Generators who process their own filters are not regulated provided the filters are not disposed of in a landfill but are managed by a registered processor. Y ☒ N ☐
Is the facility a registered used oil filter processor? (62-710.850) Y ☒ N ☐
2. Are the filters stored in above ground containers which are: (62-710.850(6))
In good condition? Y ☐ N ☒
Closed or otherwise protected from weather? Y ☐ N ☒
Labeled "Used Oil Filters"? Y ☐ N ☒
Stored on an oil impervious surface? Y ☐ N ☐ in known
3. Are records maintained on DEP Form 62-710.900(2) or equivalent that include: (62-710.850(5)(a))
Destination or end use of the processed filters? Y ☒ N ☐
Name and street address of each destination or end user? Y ☒ N ☐
Are copies kept at the facility's street address for 3 years? (62-710.850(5)(b)) Y ☒ N ☐
4. Is an Annual Report submitted by March 1 for the previous calendar year summarizing the above records? (62-710.850(5)(c)) Y ☒ N ☐

Facility Name: WECO Environmental
Date: 10/17/96

Oil Management Standards - 279.54

1. Is used oil stored only in tanks or containers? (Circle applicable units) Y ✓ N

2. If the facility has tanks, do they comply with 62.761 and 62.762 F. A. C. rules? Y ✓ N

(Applicable to USTs over 100 g and ASTs over 550 gallons. Describe in narrative, including number and size of tanks, noting registration numbers if applicable, and compliance status.)

Is secondary containment consisting of a floor and dike which are impervious to oil provided for ASTs? Applies to all ASTs regardless of size per 279.54(d & e)

Y N ✓

3. Are containers and tanks in good condition and not leaking? (279.54(b)) Y ✓ N

4. Are containers provided with secondary containment consisting of walls and floor at a minimum? (279.54(c)) Y ✓ N

Is the containment system impervious to oil so as to prevent migration?

Y N ✓ Unknown - ? about

5. Are ASTs, UST tank fill lines and containers labeled "used oil"? (279.54(f)) Y ✓ N

6. Does the facility stop operations and clean up releases of used oil, repairing or replacing any leaking units as applicable? (279.54(g)) Y ✓ N

General Facility Standards - 279.52

1. Is the facility maintained and operated to prevent a fire, explosion or planned or unplanned release of used oil to the air, soil, or water which could threaten human health or the environment? (279.52(a)(1)) Y ✓ N

2. Does the facility have an internal communication or alarm system capable of giving immediate emergency instruction to facility personnel? (279.52(a)) Y ✓ N

3. Is there a telephone, alarm, 2-way radio or other device at the scene of operations immediately available and capable of summoning assistance from local fire departments? (279.52(a)(2)(ii)) Y ✓ N

Is there immediate access to this equipment by all personnel who are engaged in pouring, mixing, spreading or otherwise handled, either directly or by voice or visual contact with another employee? (279.52(a)(4))

Y ✓ N

4. Describe fire control equipment. Is it adequate? (279.52(a)(2)(iii)) Y ✓ N

5. Is spill control and decontamination equipment present? (279.52(a)(2)(iii)) Y ✓ N

6. If sprinklers, water hoses or foam producing equipment is part of the facility fire control equipment, is water available at adequate volume and pressure? (279.52(a)(2)(iii)) Y N N/A

7. Is the emergency equipment inspected and tested periodically?

Y ✓ N

Frequency? Weekly/Daily

Facility Name: F. Lee Environmental
Date: 10/17/96

8. Is there adequate aisle space to allow unobstructed movement of facility personnel and emergency equipment to any area of the facility where needed? (279.52(a)(5i)) Y ☒ N ☐

9. Has the facility made emergency response arrangements with the following: (279.52(a)(6))

Fire Department: St. Petersburg Y ☒ N ☐
Police: St. Petersburg Y ☒ N ☐
Hospital: Unknown Y ☐ N ☐
Emergency Response Contractor: Laidlaw Y ☒ N ☐

10. If not, has the facility attempted to do so and is the refusal documented? Y ☐ N ☐

Contingency Plans and Emergency Response -- 279.52(b)

1. Does the facility have a contingency plan? Y ☒ N ☐

2. Is it at the facility and easily available? Y ☒ N ☐

3. Does the plan include:

Fire Response Procedure: (compare to 279.52(b)(6)) N/A ☐ Y ☒ N ☐

Spill Response Procedures: " N/A ☐ Y ☒ N ☐

Explosion Response Procedures: " N/A ☐ Y ☒ N ☐

Instructions for handling contaminated materials & residues Y ☒ N ☐

A description of arrangements with local authorities: N/A ☐ Y ☐ N ☒

Emergency Coordinators: (Name) Lynn LeMaster, Tim Hagan Y ☒ N ☐

Addresses and telephone numbers of Emergency Coordinators: Y ☒ N ☐

Emergency equipment list: Y ☒ N ☐

Specifications and capabilities of emergency equipment: Y ☐ N ☒

Locations of emergency equipment: Y ☐ N ☒

An evacuation plan and routes: Y ☒ N ☐

Evacuation/alarm signals: Y ☒ N ☐

External reporting procedures: Y ☒ N ☐

Internal recordkeeping requirements: Y ☒ N ☐

4. Is the plan up to date, with no changes to the list of emergency equipment, list of emergency coordinators, applicable regulations or contingency plan failures since the last revision? (279.52(b)(4)) Y ☒ N ☐

5. Has the plan been distributed to the local police, fire department, ERT and hospital? Circle omitted authorities (279.52(b)(3)) Y ☐ N ☒
no proof

6. Is the emergency coordinator authorized to commit funds for incident response? Y ☒ N ☐

7. Has the processor noted in the operating record any incidents requiring implementation of the contingency plan? (279.52(b)(6)(ix)) Y ☒ N ☐

9. Were written reports made within 15 days to the DEP? (279.52(b)(6)(ix)) Y ☒ N ☐

Facility Name: H. Co Environmental
Date: 10/17/96

Rebuttable Presumption and Analysis Plan -- 279.53, 279.55

1. Does the processor have a written analysis plan to determine whether used oil stored at the facility has a total halogen content above or below 1,000 ppm and whether the facility's used oil fuel meets the used oil specification? (279.55)(a)) Y ☒ N ☐

2. Is the 1,000 ppm halogen determination made by testing? Y ☒ N ☐

If so, does the analysis plan cover: (279.55(a)(2))

Sampling methods? Y ☒ N ☐

Frequency of sampling? Y ☒ N ☐

Analytical Methods? Y ☒ N ☐

Is the 1,000 ppm halogen determination made by process knowledge? Y ☒ N ☐

If so, is the type of information that will be used to determine the halogen content stated in the analysis plan? (279.55(a)(3)) Y ☒ N ☐

3. Have any analyses showed exceedances of the 1,000 ppm level? Y ☐ N ☒

If so, was the oil managed as hazardous waste? Y ☐ N ☐

If not, was the oil exempt? Describe basis for presumption rebuttal in narrative. (ex. analysis, refrigerant oil, etc.) N/A ☒ Y ☐ N ☐

4. Is the used oil fuel specification determination made by testing?

If so, does the analysis plan cover: (279.55(b)(2))

Sampling methods? Y ☒ N ☐

Whether the oil will be tested before or after processing? Y ☒ N ☐

Frequency of sampling? Y ☒ N ☐

Analytical Methods? Y ☒ N ☐

Is the used oil fuel specification determination made by process knowledge? Y ☒ N ☐

** partial analysis / partial process knowledge*
If so, is the type of information that will be used to determine the halogen content stated in the analysis plan? (279.55(b)(3)) Y ☒ N ☐

5. Are all oil processing residues managed as used oil, reclaimed, or used as asphalt manufacture feedstock? (279.59), N/A ☐ Y ☐ N ☒

some residues disposed in bulk pile

If not, has the processor conducted a hazardous waste determination? (279.10(e)) N/A ☐ Y ☐ N ☒

for sludges, etc.

6. Are test records or copies of records providing basis for determinations kept for 3 years? (279.57(a)(2)(i)) Y ☒ N ☐

where tests have been performed primarily for waste accepted from off-site, but not waste generated on-site.

Facility Name: F. J. Co EnvironmentalDate: 10/17/96**Recordkeeping and Reporting -- 279.57, 62-710.510-520 F.A.C.****1. Do used oil acceptance records include: (279.56(a))**

Name & address of the generator or off site source of the used oil?

Y ☒ N ☐

EPA ID # of oil provider (if applicable)?

Y ☐ N ☒

Name & Address of the transporter delivering the oil to the facility?

Y ☒ N ☐

EPA ID # of the transporter delivering the oil

Y ☒ N ☐

Quantity of oil shipped?

Y ☒ N ☐

Type of oil received (62-710.510(1)(c))

Y ☒ N ☒

Date of shipment?

Y ☒ N ☐**2. Do used oil delivery records include: (279.56(b), also check marketer requirements)**

Name & Address of receiving facility? (burner, processor or disposal site)

Y ☒ N ☐

EPA ID # of receiving facility?

Y ☐ N ☒

Name & Address of transporter delivering the oil?

Y ☒ N ☐

EPA ID # of transporter?

Y ☒ N ☐

Quantity of oil delivered?

Y ☒ N ☐

End Use of the oil? (62-710.510(1)(e))

Y ☒ N ☐

Date of delivery?

Y ☒ N ☐**3. Does the facility keep records on DEP Form 62-710.900(2) or equivalent? (62-710.501(1))**Y ☒ N ☐**4. Does the facility submit an annual report by March 1 summarizing the on site records for the previous calendar year? (62-710.520)**Y ☒ N ☐

If not, is the facility an electric utility processing only self generated used oil for recycling, which is exempt from state registration and reporting requirements? (62-710.530)?

Y ☐ N ☒**5. Does the transporter keep copies of the record and reports for three years at the street address of the facility? (62-710.510(2))**Y ☒ N ☐**Closure -- 62-710.800(3) F.A.C. and 279.54(h)****1. Has the facility submitted a written closure plan? (62-710.800(3)(a))**Y ☒ N ☐**2. Does the plan include procedures for removing containers of oil and residues?**Y ☒ N ☐

Cleaning and decontaminating tanks and ancillary equipment?

Y ☒ N ☐

Removing contaminated soils?

Y ☒ N ☐

Eliminating the need for further maintenance?

Y ☐ N ☒

If the facility operated tank systems, and not all contaminated soils can be practicably removed, the owner or operator must close the facility as a hazardous waste landfill.

USED OIL MARKETER CHECKLIST

Facility Name: Hawco. Date: 10/16/96
Facility Representative: Tim Hogan Facility ID #: FLD 152 764 767
Inspector: B. Strauss Registration #: _____

40 CFR 279 Subpart H -- Marketer Standards

1. Does the facility direct shipments of off-specification used oil to used oil burners? (except processors who burn incidentally) Y _____ N ✓
Or does the facility first claim that used oil that is to be burned for energy recovery meets the used oil fuel specification Y ✓ N _____
2. Check other Subparts the marketer complies with. (Must comply with at least one and have EPA ID #)
____ C - Generator ✓ E - Transporter ✓ F - Processor ____ G - Burner
3. Is the facility registered? (62-710.500(1)(c))) ____ N/A (Utility) Y ✓ N _____
4. Does the marketer only send off specification oil to burners with EPA ID Numbers (279.71(a)) N/A ✓ Y _____ N _____
And approved Industrial Furnaces or Boilers(279.71(b)) Y _____ N _____
5. Does the marketer claim the used oil meets the specification by analysis? Y ✓ N _____
Or by obtaining copies of generator performed analyses? (279.72(a)) Y _____ N _____
6. Does the marketer have copies of written and signed certifications from all off specification oil burners to which he has directed shipments stating that the burner: (279.75) N/A _____
Has notified EPA of its used oil management activities? from Y ✓ N _____
Will only burn off spec oil in an approved device? > 3 years ago. Y ✓ N _____
7. Do Off specification oil delivery records include: (279.74(a)) N/A ✓
Name & Address of transporter delivering oil? Y _____ N _____
EPA ID # of transporter? Y _____ N _____
Name & Address of receiving burner? did not receive Y _____ N _____
EPA ID # of receiving burner? in detail - none Y _____ N _____
Quantity of oil shipped? shipped > 3 years. Y _____ N _____
Date of shipment? Y _____ N _____
8. Do on specification oil delivery records include: (279.74(b)) N/A _____
Name & Address of receiving facility? Y ✓ N _____
Cross reference to analysis or other information used to determine that the oil meets the specification? Y ✓ N _____
Quantity of oil shipped? Y ✓ N _____
Date of shipment? Y ✓ N _____
9. Does the marketer keep copies of records for three years? (279.72(b)) Y ✓ N _____
10. Does the facility maintain records on DEP Form 62-710.900(2), including type of oil and destination or end use? Y ✓ N _____
11. Does the facility submit annual reports by March 1? Y ✓ N _____

USED OIL TRANSPORTER CHECKLIST

Facility Name: Howco Date: 10/16/96
Facility Representative: Tim Hagan Facility ID #: FLD152 764 767
Inspector: R. Strauss Registration # _____

40 CFR 279 Subpart E -- Transporter Standards

1. Is the facility exempt under any of the following? (279.40(a))

Y _____ N ✓

On site transport?

Generator transporting < 55 g /time to a collection center?

Transporter of < 55 g /time from generator to aggregation point owned by same generator ?

2. If the transporter also transports hazardous waste in the same trucks as are used to transport used oil, are the vehicles emptied per 261.7 after HW shipments? (If not, the used oil must be managed as hazardous)

N/A Y _____ N _____

3. Does the transporter process used oil incidental to transport? (279.41)

Y _____ N ✓

Are any residues managed as used oil, reclaimed, or used as asphalt manufacture feedstock?

N/A ✓ Y _____ N _____

If not, has the transporter conducted a hazardous waste determination? (279.10(e))

N/A ✓ Y _____ N _____

4. Has the facility notified of used oil activities? Check EPA form 8700-12

Y ✓ N _____

5. Does the transporter only deliver used oil to other transporters, oil processors, off specification used oil burners with EPA ID Numbers, or to on-specification oil burners? (279.43(a))

Y ✓ N _____

6. Does the transporter comply with DOT requirements? (279.43(b))

Y ✓ N _____

7. If any oil is discharged during transport, does the transporter: (279.43(c))

N/A _____

Notify National Response Center and State Warning Point and Coast Guard per 33 CFR 153.203, as applicable?

Coast Guard not gen
Y _____ N ✓

Report to DOT in writing per 49 CFR 171.16?

in known, not in list.
Y _____ N _____

Clean up any discharges until the discharge poses no threat?

Y ✓ N _____

8. Does the facility also transport used oil filters?

Y _____ N _____

If so, are the filters stored in above ground containers which are: (62-710.850(6))

In good condition?

Y ✓ N _____

Closed or otherwise protected from weather?

Y ✓ N _____

Labeled "Used Oil Filters"?

Y ✓ N _____

Stored on an oil impervious surface?

Y _____ N ✓ unknown

Facility Name: Lowco
Date: 10/10/96

Transporter Recordkeeping - 279.46

1. Do used oil acceptance records include: (279.46(a))

Name & Address of facility providing the oil for transport?

Y ☒ N ☐

EPA ID # of oil provider (if applicable)?

Y ☐ N ☒

Quantity of oil shipped?

Y ☒ N ☐

Date of shipment?

Y ☒ N ☐

Signature of oil provider, dated upon receipt?

Y ☒ N ☐

2. Do used oil delivery records include: (279.46(b))

Name & Address of receiving facility or transporter?

Y ☒ N ☐

EPA ID # of receiving facility or transporter?

Y ☒ N ☐

Quantity of oil delivered?

Y ☒ N ☐

Date of delivery?

Y ☒ N ☐

Signature of oil receiver, dated upon receipt?

Y ☐ N ☒

3. Do the above records also include state required information on the type of oil and destination or end use? (62-710.510(1)(c & e))

Y ☒ N ☐

4. Does the facility keep records on DEP Form 62-710.900(2) or equivalent? (62-710.501(1))

Y ☒ N ☐

5. Does the facility submit an annual report by March 1 summarizing the on site records for the previous calendar year? (62-710.520)

Y ☒ N ☐

If not, is the facility an electric utility transporting only self generated used oil for recycling, which is exempt from state registration and reporting requirements? (62-710.530)?

Y ☐ N ☐

7. Does the transporter keep copies of the record and reports for three years at the street address of the facility? (62-710.510(2))

Y ☒ N ☐

Transporter Certification (62-710 F.A.C.)

1. Is the transporter certified? (local governments, and < 55g/time transporters are exempt) (62-710.600)

N/A ☐ Y ☒ N ☐

2. Does the facility maintain training records? (62-710.600(2)(c))

Y ☒ N ☐

3. Does the facility maintain insurance or financial assurance of \$100,000 combined single limit? (62-710.600(2)(d))

Y ☒ N ☐

4. Is the facility registration form and ID number displayed? (62-710.500)

Y ☒ N ☐

Facility Name: swlo
Date: F20 150 764 767.

Transfer Facility Standards - 279.45

- 1 Does the transporter store used oil at any transportation related facility (including parking lots) for more than 24 hours and not longer than 35 days during the normal course of transport? Transfer facilities storing used oil more than 35 days must comply with 279 Subpart F

N/A ☒ Y ☐ N ☒

Is the transfer facility registered per 62-710.500(1)(a) F. A. C.?

Y ☐ N ☐

- 2 Does the transporter determine whether used oil stored at a transfer facility has a total halogen content above or below 1,000 ppm?

Y ☐ N ☐

Is this done by testing?

Y ☐ N ☐

Is this done by process knowledge? Describe basis in narrative.

Y ☐ N ☐

Are test records or copies of records providing basis for determination kept for 3 years?

Y ☐ N ☐

- 3 Have any analyses showed exceedances of the 1,000 ppm level?

Y ☐ N ☐

If so, was the oil managed as hazardous waste?

Y ☐ N ☐

If not, was the oil exempt? Describe in narrative.

N/A ☐ Y ☐ N ☐

- 4 Is used oil stored only in tanks or containers? (Circle applicable units)

Y ☐ N ☐

- 5 If the facility has tanks, do they comply with 62-761 and 62.762 F. A. C rules? (Describe in narrative, including number and size of tanks, noting registration numbers if applicable, and compliance status.)

Y ☐ N ☐

Is secondary containment provided and adequate?

Y ☐ N ☐

- 6 Are containers, and tank trailers in good condition and not leaking?

Y ☐ N ☐

- 7 Are containers provided with secondary containment consisting of walls and floor at a minimum?

Y ☐ N ☐

Is the containment system impervious to oil so as to prevent migration?

Y ☐ N ☐

- 8 Are ASTs, UST tank fill lines and containers labeled "used oil"?

Y ☐ N ☐

- 9 Are used oil filters stored more than 10 days?

If so, is the facility a registered used oil filter transfer facility? (62-710.850) N/A ☐

Y ☐ N ☐

- 10 Does the facility stop operations and clean up releases of used oil, repairing or replacing any leaking units as applicable?

Y ☐ N ☐

Randy Strauss



Pinellas County Public Health Unit

June 11, 1996

Tim Hagan
HOWCO Environmental Services, Inc.
843 43rd Street South
St. Petersburg, FL 33711-1922

D.E.P.

JUN 18 1996

Re: 528624557
HOWCO Environmental Services Inc.
St. Petersburg
PINELLAS

SOUTHWEST DISTRICT
TAMPA

Dear Mr. Hagan:

On May 15, 1996 the annual Florida Administrative Code, Chapter 62-762 compliance inspection was performed at your facility. Representatives of this agency, the Department of Environmental Protection, the City of St. Petersburg Fire Department, and your company were in attendance. You have been previously supplied with a copy of the inspection document, although a copy is enclosed for your use.

This letter addresses the issues revealed during that visit, and your comments are requested:

1. It is unknown, at this time, whether the facility has an approved release detection system for the underground transfer piping connecting the West and East tank farms. Please note the following pertinent FAC Chapter 62-762 references: 762.200(3), 762.200(19), 762.600(5), 762.600(7). The aforementioned sections define both integral and bulk piping, as well as describe release detection requirements for those applications. A December 1, 1993 letter between the DEP and the Florida Petroleum Council discusses proposed rule changes allowing the inclusion of 3-inch diameter and larger piping into the bulk category; and an administrative decision to allow the down-sizing prior to the rule change.

An initial question, then, would be on what diameter pipe connects the two tank farms? If you choose to select the inclusion of the piping, in the bulk piping category; please be prepared to demonstrate the diameter of the pipe at both tank farms.

Florida Groundwater Service, Inc. on behalf of your company, attempted to satisfy the integral piping release detection requirement. Their January 5, 1996 letter to this agency, regarding monitor well #11 did not provide enough information. Please have your consultant provide a detailed response, describing how the well meets the requirements of FAC Chapter 62-761.640(1)(a-d). Your company needs to decide whether release detection will be by the "pipe pressure test" or "ground water monitoring well".

2. In accordance with FAC Chapter 62-762.700(2) repairs shall be made to storage tank systems in a manner to prevent any discharge due to structural failure or corrosion. FAC Chapter 62-762.200(37) defines the storage tank



PINELLAS COUNTY PUBLIC HEALTH UNIT
ENGINEERING - SUITE 300
4176 EAST BAY DRIVE
CLEARWATER, FLORIDA 34624-6966

TEL: (813) 538-7277 FAX: (813) 538-7293 SUNCOM: 558-7277

LAWTON CHILES, GOVERNOR



June 11, 1996
HOWCO Environmental Services Inc.

Page 2

system to include the aboveground tank, integral piping, and the release detection components. FAC Chapter 62-762.200(32) defines release detection to include secondary containment, and FAC Chapter 62-762.200(34) includes an "impervious containment area" in its definition of secondary containment.

- Tank #142 exhibited a hole in its roof. Please repair and describe the process used to verify the structural integrity of the tank shell [Photo #1].
- The western saddle for tank #130 exhibited damage to its concrete structure [Photo #2]. Please repair.
- The eastern tank farm, black tank section, exhibits cracking of the containment floor. Investigate the extent of the penetration, sealing where necessary to provide an impervious construction condition for the unit.
- The western tank farm exhibits a more widespread deterioration of the containment floor, and concrete block walls. See the accompanying site diagram and photographs highlighting existing conditions.

[Photo #3 - hole in block wall appears to demonstrate hollow core nature of wall unit. While the hollow core may not be a universal construction feature, the area indicated requires repair.]

[Photo #4 - "step" cracks following the mortared edges both inside and outside the block wall have apparently compromised the impervious integrity of this corner of the containment unit. Please repair.]

[Photo #5 - South loading area wall in the vicinity of tanks #170-173 exhibit extensive "step" cracking, as well as deterioration of the mortar between blocks. This damage has affected several courses of block. Please repair.]

[Photo #6 - Tank #173 appears to be experiencing a deterioration of the concrete base support. There is a hole at the 7:30 position (Bob Boyett is aware of this item).]

[Photo #7 - presents a typical example of cracking of the floor of the portion of the containment unit where tanks #120-128 are located. Investigate the extent of the penetration, sealing where necessary to provide an impervious construction condition for the unit.]

3. Your attention is directed to FAC Chapter 62-762.800(2) describes the

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HOWCO Environmental Services Inc.

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requirements for the closure of aboveground storage tank systems. Subsection (d) provides additional exemptions for sites with documented contamination, or that were initially installed with secondary containment. Your attention is again directed to FAC Chapter 62-762.200(34) which defines secondary containment, and to (16) which defines impervious.

Herein lies the next series of issues. The asphalt berm surrounding the western portion of the West Farm appears to be faintly depicted in the March 1979 aerial photo, although it is more clearly depicted in the November 1984 aerial. Based on the March 1994 aerial photo, tank #120, does appear to be present.

Based on several discussions it is this agency's initial opinion that asphalt is not a recognized impervious secondary containment barrier to oil products. Toward the resolution of this issue, this agency will accept a sealed opinion from a Professional Engineer, on the degree to which your asphalt berm and concrete pad can provide impervious secondary containment.

I have had the opportunity to examine the Contamination Assessment Report dated April 1996 as prepared by your consultant for the Department of Environmental Protection. This document appears to indicate that neither soil nor ground water sampling occurred within the confines of the western portion of the West tank farm.

Therefore, you are advised to have the condition of the containment assessed, and if not impervious perform a closure assessment of the tank #120 portion in accordance with Department of Environmental Protection regulations and guidelines.

4. FAC Chapter 62-762.450(1)(a) required the submission of a Storage Tank Registration Form notifying the DEP of the planned closure of a storage tank system. This document was apparently not submitted when tank #120 was removed by your staff. Please sign the enclosed document, forwarding the original to the DEP Registration Section, 2600 Blair Stone Road, Tallahassee 32399-2400; copying our agency.

5. FAC Chapter 62-762.710(2) requires the retention of records associated with the results of the examination of monitoring wells. In accordance with Chapter 62-762.600(5) the release detection system shall be monitored at least once a month. The January 5, 1996 FGS Inc. letter informed this agency that monitor well #11 would provide leak detection for the underground transfer line. It appears that up to the date of the inspection, no records have been maintained for this well.

June 11, 1996
HOWCO Environmental Services Inc.

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6. In accordance with FAC Chapter 62-762.600(2) the monthly release detection process requires the thorough inspection of the exterior of each tank and the secondary containment system, noting: wetting, discoloration, blistering, corrosion, cracks, or other signs of structural damage or leakage. At the time of the inspection, the HOWCO monthly inspection forms did not note individual tank defects, nor deterioration of the secondary containment structures. Mr. Boyett and I discussed how this oversight might be remedied. Besides the aforementioned containment structure defects, several tanks exhibit peeling paint, corrosion, and/or saddle damage. Further, both east and west containment units exhibit puddling of oil products which while not impacting the 110% capability of the units, do not mesh with the noted "clean-dry" status of monthly reports. You are advised to implement a more accurate reporting of the condition of the tanks and containment units at your facility. Similarly, tanks with deformities should be noted on this monthly report (tank #173).

7. In accordance with FAC Chapter 62-762.450(4) notification requirements, please investigate the apparent overfill situation that occurred with tank #141. When Mr. Boyett and I climbed to the top of this tank and #142, it appeared that #141 had recently experienced an overfill condition. The tank top was wet, and adjacent tanks exhibited splash marks. Please determine the amount of product released into the containment unit.

Please be advised that this agency may have additional questions concerning the registration date(s) of the present tank farm units based on information in both the Contamination Assessment Report, and from the aerial photographs.

If I may be of further assistance, please contact me at (813) 538-7277 extension 136.

Sincerely,



Ernest M. Roggeline
Environmental Specialist III
Pollutant Storage Tank Program

DEPARTMENT OF ENVIRONMENTAL PROTECTION
POLLUTANT STORAGE TANK SYS.
INSPECTION REPORT FORM - COVER PAGE

PAGE: 1 OF 3
PRINTED: 05/14/96

FACILITY ID #: 528624557

COUNTY: PINELLAS

FACILITY NAME: HOWCO ENVIRONMENTAL SERVICES, INC

FACILITY LOCATION: 843 43RD ST S, SAINT PETERSBURG

FACILITY CONTACT: TIM HAGAN

PHONE: (813) 327-8467

OWNER: HOWCO ENVIRONMENTAL SERVICES INC

PHONE: (813) 327-8467

OWNER ADDRESS: 843 43RD ST S, SAINT PETERSBURG, FL, 33711-1922

OWNER CONTACT: TIM HAGAN

OWNER CHANGE DATE: 06/16/93

LATITUDE: 27-45-47 LONGITUDE: 82-41-32

FAC TYPE: NON-RETAIL BUSINESS

LAST UST COMPLIANCE DATE: 00/00/00

LAST AST COMPLIANCE DATE: 11/02/94

CONTAMINATION DATA AVAILABLE: OTHER ATRP

TANK #	SIZE	CONTENT	INSTALL DATE	UNDER OR ABOVE	TANK TYPE	INTEGRAL PIPING	MONITORING SYSTEM	TANK STAT
1	2000	A	XX/XX	A	D	C	I	B
100	29500	L	XX/80	A	ACK	BI	M	U
101	28500	L	XX/80	A	ACK	BI	M	U
105	14000	L	XX/80	A	CKM	BI	M	U
106	9870	L	XX/80	A	CKM	BI	M	U
120	21775	L	XX/80	A	ACK	BI	M	U
121	27989	L	XX/80	A	ACK	BI	M	U
122	27989	L	XX/80	A	ACK	BI	M	U
123	27989	L	XX/80	A	ACK	BI	M	U
124	27989	L	XX/80	A	ACK	BI	M	U
125	18040	L	XX/80	A	ACK	BI	M	U
126	18565	L	XX/80	A	ACK	BI	M	U
127	18565	L	XX/80	A	ACK	BI	M	U
128	23792	L	XX/80	A	ACK	BI	M	U
129	21775	L	XX/80	A	ACK	BI	M	U
140	26041	L	XX/80	A	ACK	CKM	M	U
141 <i>wet</i>	17432	L	XX/80	A	ACK	CKM	M	U
142 <i>done</i>	17432	L	XX/80	A	ACK	CKM	M	U
143	17013	L	XX/80	A	ACK	CKM	M	U
144	18886	L	XX/80	A	ACK	CKM	M	U
150	15000	L	XX/80	A	ACK	CKM	M	U
151	15000	L	XX/80	A	ACK	CKM	M	U
152	28130	L	XX/80	A	ACK	CKM	M	U
153	20531	L	XX/80	A	ACK	CKM	M	U
154	18172	L	XX/80	A	ACK	CKM	M	U
155	20139	L	XX/80	A	ACK	CKM	M	U
160	14792	L	XX/80	A	ACK	CKM	M	U

MORE TANKS LISTED NEXT PAGE

AST

INSPECTION TYPE (ALL THAT APPLY)

☒ ROUTINE
☐ INSTALL
☐ ABANDONED
☐ DISCHARGE
☐ CLOSURE
☐ REINSPECT

SITE INFORMATION (ALL THAT APPLY)

☐ NEAR PUB WELL
☐ CONTAMINATED
☐ COMPLAINT
☐ ACID TANKS
☐ REPAIRED
☐ UPGRADED
☐ UST & AST
☐ HAZARD MAT

DEP DISTRICT OR LOCAL PROGRAM:

Pinellas CPHU-ENGINEERING

INSPECTOR NAME (PRINT)

EM Roggelin

CONTACT NAME (PRINT)

Bob Boyatt

INSPECTOR'S SIGNATURE & DATE

W J-A-Sowers

CONTACT'S SIGNATURE & DATE

Bob Boyatt 5/15/96

STATE OF FLORIDA
DEPARTMENT OF ENVIRONMENTAL PROTECTION
POLLUTANT STORAGE TANK SYSTEM
INSPECTION REPORT FORM - COVER PAGE

PAGE: 2 OF 3
PRINTED: 05/14/96

TANK #	SIZE	CONTENT	INSTALL DATE	UNDER OR ABOVE	TANK TYPE	INTEGRAL PIPING	MONITORING SYSTEM	TANK STAT
161	14792	L	XX/80	A	CKM	BI	M	U
162	14792	L	XX/80	A	CKM	BI	M	U
163	14792	L	XX/80	A	ACK	CKM	M	U
164	18832	L	XX/80	A	ACK	CKM	M	U
165	18618	L	XX/80	A	ACK	CKM	M	U
166	15000	L	XX/80	A	ACK	CKM	M	U
170	11000	L	XX/80	A	ACK	ACK	M	U
171	9607	L	XX/80	A	ACK	ACK	M	U
172	9703	L	XX/80	A	ACK	ACK	M	U
173	5500	L	XX/80	A	ACK	ACK	M	U
174	2898	L	XX/80	A	ACK	ACK	M	U
180	56796	L	XX/80	A	ACK	CKM	M	U
2	4000	D	XX/XX	A	D	C	I	B
3	3000	D	XX/87	A	AEK	D	BC	U

STATE OF FLORIDA
DEPARTMENT OF ENVIRONMENTAL PROTECTION
POLLUTANT STORAGE TANK SYSTEM
INSPECTION REPORT FORM - COVER PAGE

PAGE: 3 OF 3
PRINTED: 05/14/96

FACILITY ID #: 528624557

COUNTY: PINELLAS

FACILITY NAME: HOWCO ENVIRONMENTAL SERVICES, INC

FACILITY LOCATION: 843 43RD ST S, SAINT PETERSBURG

FACILITY CONTACT: TIM HAGAN

PHONE: (813) 327-8467

COMMENTS: DISCUSS CLOSURE WITH PEDRO VARGAS-PRADA

538-7277 ext 137 re EXISTENCE OF 2^o CONTAINMENT.

• PROVIDE NARRATIVE OF TANK #120 REMOVAL, RECEIPTS.

* HAVE EGS PROVIDE GWTR FLOW DIRECTION & HYDRAULIC CONDUCTIVITY DATA FOR MW#11.

• SUBMIT STRF FOR REMOVAL OF TANK #120.

• BEGIN MONTHLY SAMPLING & RECORD FOR MW#11

* TANK #142 - REPAIR ROOF HOLE.

• EXPLAIN APPARENT OVERTFLOW SITUATION TANK #141 (AMOUNT SPILLED)

• MAJOR RETROFIT DATE 12-31-99

NOTE: CRACKS IN WALLS/FLOORS OF WEST & EAST

TANK FARMS; PROBLEMS WITH MORTAR SEVERAL AREAS.

NOTE: PEELING PAINT/CORROSION ON TANKS.

- RECORD AS NOTED.

TANK #130 HORIZONTAL: SADDLE DAMAGED

NOTE: TANKS WITH DEFORMITIES.

FORMER PUMP LOCATION IN FLOOR - COLLECTS OIL.



ABOVEGROUND STORAGE TANK COMPLIANCE INSPECTION FORM

Name: Howco
Facility I.D.#: 528624557
Date: 5-15-96

		Yes	No	Unk	N/A
I.	REGISTRATION/NOTIFICATION: Comments: _____				
	1. Facility has registered all applicable tanks on site; 62-762.400	1.	X		
	2. Current registration placard is properly displayed; 62-762.410 (6)	2.	X		
	Proper notification has been made for the following; 62-762.450:				
	3. Abandonment and closure (30 days prior); (1) (a) <u>Tank #120</u>	3.		X	
	4. Change of ownership (30 days after); (1) (b)	4.			X
	5. Retrofitting, replacement or upgrading; (10 days prior); (1) (c)	5.			X
	6. Change of tank status (in service/out of service); (1) (d)	6.			X
	7. Change of facility status (e.g. substances stored); (1) (e)	7.			X
	8. Change of method of financial responsibility (within 30 days); (2)	8.			X
	9. The facility owner/operator notified D.E.R. of internal tank inspection 24 hrs prior to the test; (3)	9.			X
	10. Loss of greater than 100 gallons on an impervious surface or 500 gallons inside secondary containment within one working day; 450 (4)	10.			X

		Yes	No	Unk	N/A
II.	RECORDS KEEPING: Comments: <u>#11 - MONITOR WELL MONTHLY DATA</u>				
	11. All records were maintained for two (2) years and were available for inspection within five (5) working days; 62-762.710	11.		X	
	12. Some, but not all records were maintained for two (2) years and were available for inspection within five (5) working days; 62-762.710	12.	X		

		Yes	No	Unk	N/A
III.	REPORTING/DISCHARGE RESPONSE/ REPAIRS: Comments: _____				
	Proper reporting requirements met for the following; 62-762.460:				
	13. Integral piping tightness test failure within 10 days; (1)	13.			X
	14. Pollutant discharge exceeding 25 gallons on a pervious surface; (2)	14.	X		
	15. Positive response of a release detection device within one working day; (3)	15.			X
	The owner or the operator of the system which has discharged has:				
	16. Taken it out of service; 62-762.700 (1), had it repaired or replaced; 700, or properly closed it; 800 <u>Tank has been removed</u>	16.	X		
	17. Removed any regulated substances from the system; 62-762.820 (1)	17.			X
	18. Tightness tested all repaired components before placing them back in service; 62-762.700 (5)	18.			X
	19. Begun initial corrective actions for a release; 62-762.820 (2)	19.			X

		Yes	No	Unk	N/A
IV.	INVENTORY REQUIREMENTS FOR TANKS IN CONTACT WITH THE SOIL: Comments: _____				
	20. All inventory requirements maintained in accordance with 62-762.720 (1)	20.			X
	21. Some, but not all inventory requirements maintained in accordance with 62-762.720 (1)	21.			X



Name: HOWCO
Facility I.D.#: 528624557
Date: 5-15-96

ABOVEGROUND STORAGE TANK
COMPLIANCE INSPECTION FORM

		Yes	No	Unk	N/A
V.	PERFORMANCE STANDARDS/CATHODIC PROTECTION: Comments: _____				
	Storage tank criteria; 62-762.500				
	22. Meets construction upgrading schedule; .510 and .520				
	23. Meets applicable storage tank standards; (1), (2) & (3)				
	24. Tank has secondary containment system; .500 (6) <u>concrete, block, asphalt</u>				
	25. Tank equipped with overfill protection; (3) (f) 1-4, (g)				
	Piping criteria				
	26. Meets new piping standards with secondary containment; .500 (4) & .600 (4)				
	27. Meets construction upgrading schedule; 62-762.510 (3) , & .520 (2)				
	Repairs to storage tank systems; 62-762.700				
	28. Failed storage tank system component properly repaired; (1)-(4) <u>#142</u>				
	29. Tightness testing of the required component prior to being brought back into service; (5)				
	Cathodic Protection; 62-762.730				
	30. Cathodic protection system for tank and piping provides continuous protection; (1)-(4)				
	Secondary containment; 62-762.500				
	31. Does containment area have sufficient volume; .500 (6) (a) (2)				
	32. Is the containment area made out of impervious material in accordance with Chapter 62-762, F.A.C., requirements; (6) (a) (1) <u>hollow block, cracking walls/floor</u>				
	33. Is the containment area equipped with drainage system or protected from accumulation of rain; (6) (a) (3)				
	34. Hydrant pits equipped with spill prevention equipment; (5)				

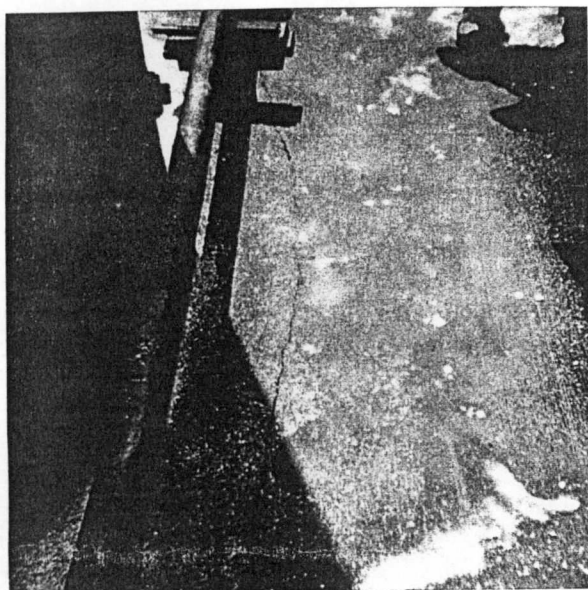
#35 - RECORD DETAILS AS NOTED ON PLANT TOUR.

		Yes	No	Unk	N/A
VI.	RELEASE DETECTION/MONITOR WELLS: Comments: <u>#36 PROVIDE GUTTER FLOW DIRECTION; HYDRAULIC CONDUCTIVITY DATA. #35 SAMPLE.</u>				
	35. Facility has an approved released-detection system; 62-762.600 & 62-762.860				
	36. Monitoring wells properly designed, constructed and installed; 62-762.640 or 62-762.600 (6)				
	37. Interstitial monitoring adequate to detect a release from integral piping; 62-762.600 (4) & (5)				

		Yes	No	Unk	N/A
VII.	OUT-OF SERVICE STATUS: Comments: _____				
	38. Are the corrosive protection devices properly maintained; 62-762.800 (1) (a)				
	39. Is the vent line and other ancillary equipment properly secured and maintained; (1) (b)				
	40. Test performed to insure the integrity of out-of-service system prior to being returned to service; (1) (c)				

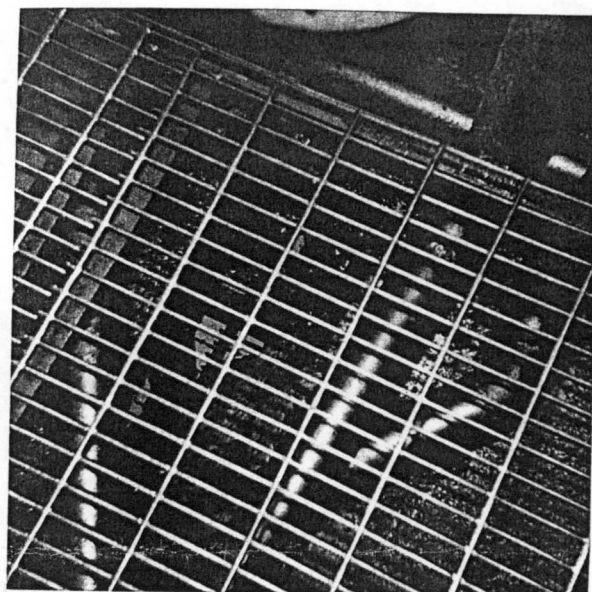
		Yes	No	Unk	N/A
VIII.	VARIANCE: Comments: _____				
	41. Has the facility for an Alternate Procedure; 62-762.850 (1)				

		Yes	No	Unk	N/A
IX.	OTHERS: Comments: _____				
	42. Any other violation noted during inspection (Explain in comments)				

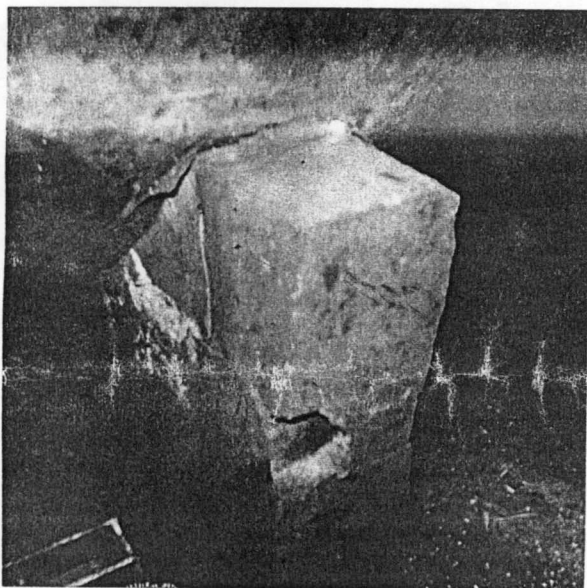


HOWCO 5-15-96 EMR
TYPICAL FLOOR 528624557
CRACK, EAST & WEST FARMS

PHOTO # 7



HOWCO 5-15-96 EMR
WEST FARM 528624557
FORMER FLOOR PUMP AREA
PIT COLLECTS OIL



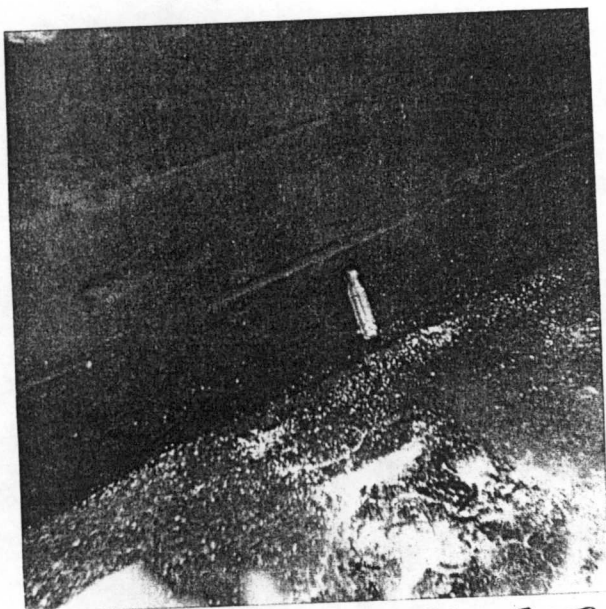
HOWCO 5-15-96 EMR
WEST FARM 528624557
TANK #30 WEST MIDDLE
SADDLE CRACKING

PHOTO # 2

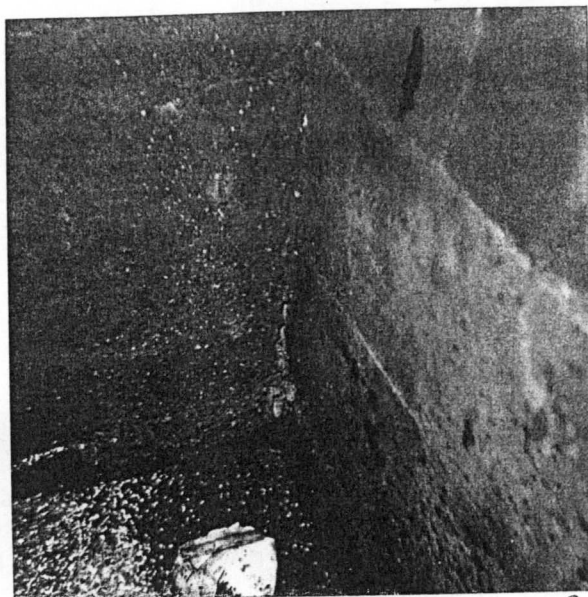


HOWCO 5-15-96 EMR
EAST FARM #142
ROOF HOLE 528624557

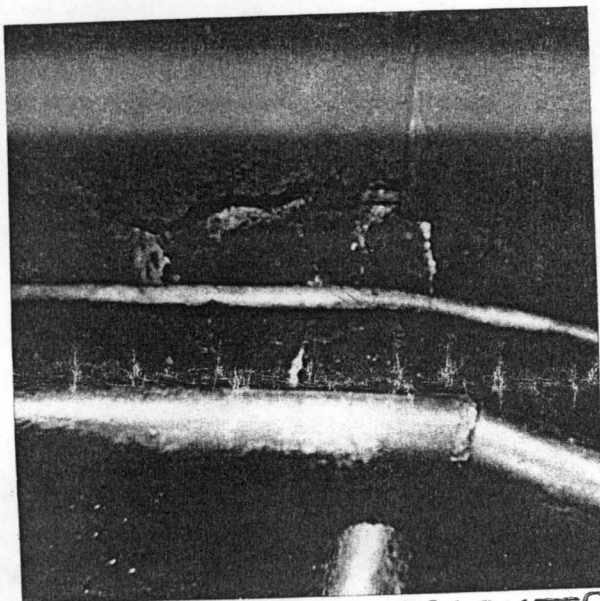
PHOTO # 1



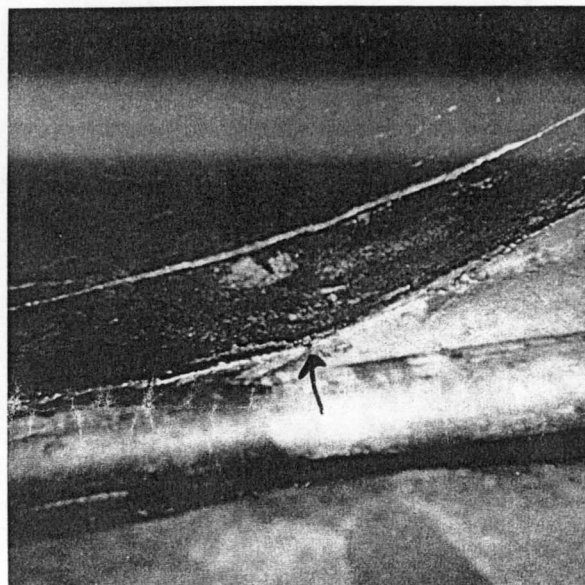
528624557 5-15-96 EWR
NORTH LOADING AREA
DAMAGED & HOLLOW BLOCK WALL
NEAR NE CORNER TANK #100
PHOTO #3



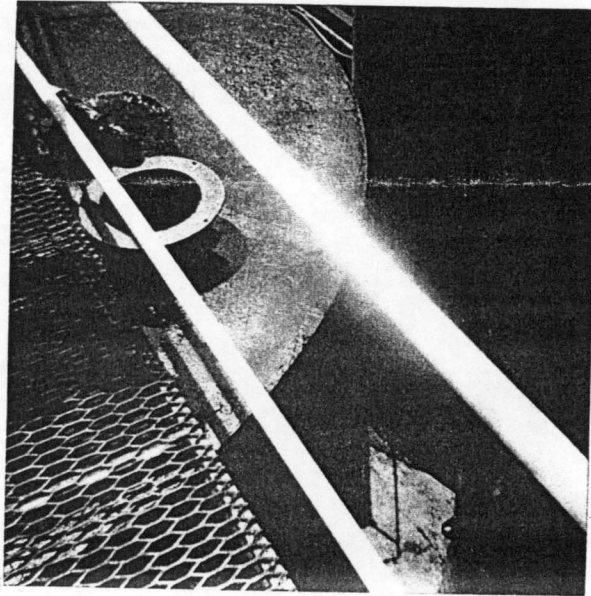
HOWCO 5-15-96 528624557
NORTH LOADING AREA
NEAR NW CORNER TANK #100
STEP CRACK & NO MORTAR EWR
PHOTO #4



HOWCO 5-15-96 528624557 EWR
WEST FARM WALL
BTWN #173 & #129
INTEGRITY



HOWCO 5-15-96 EWR
SOUTH LOADING RACK, #173
HOLE AT TANK BASE "7:30 POSITION"
528624557
PHOTO #6



HOWCO 6-15-96 EWR
EAST FARM #141 5286-
APPARENT OVERFILL 24557

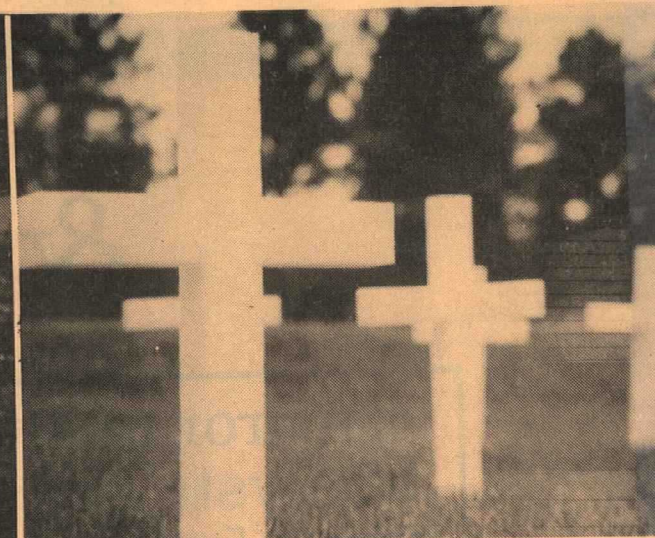
Memorandum

Florida Department of Environmental Protection

TO: Lauri Roughton, OGC
THROUGH: *WR* William R. Kutash, WPA, SWD
FROM: *E* Elizabeth B. Knauss, RCRA Program SWD
DATE: December 17, 1996
RE: HOWCO
OGC Case 91-1176
Pinellas County

Per your request I have attached a copy of HOWCO's check #505654 dated June 30, 1992 for the payment missing from the LCT database records.

There is still a discrepancy of \$0.04 from the total penalty. Per our conversation, you confirmed that we would write off this amount.



OUR SITES ARE RIGHT.

Don't let non-hazardous waste come back from the grave to haunt you. Protect your firm from the potential liabilities associated with your cradle to the grave responsibilities by choosing Howco for all your industrial waste transportation

and disposal needs.

Whether a major corporation or small business, Howco is outfitted, licensed and ready to transport and dispose of your environmental waste in a proper burial site. Processing industrial sludges to meet landfill or incineration guidelines. And reclaiming contaminated wastewater for transfer, by permit, to the sanitary sewer system. All in ways that perpetually satisfy environmental compliance laws

and regulations.

Call one of our toll free Customer Service lines at **1-800-334-6926**, **1-800-435-8467** or **813-323-0818** today to find out more about Howco's transport and disposal services.

**There's no waste
in trucking with...**

HOWCO
ENVIRONMENTAL SERVICES LTD.

Circle Reader Response #28



Department of Environmental Protection

Lawton Chiles
Governor

Southwest District
3804 Coconut Palm Drive
Tampa, Florida 33619

Virginia B. Wetherell
Secretary

April 1, 1996

Mr. Angelo Pousa
HOWCO Environmental Services
843 43rd Street South
St. Petersburg, FL 33711

Dear Mr. Pousa:

Attached for your files is a copy of the current application form for Temporary EPA identification numbers. Please replace your old forms with the new form. Use of the new form is mandated by F. A. C. Rule 62-730.161. Temporary numbers may only be issued for emergency situations such as spills, cleanup of abandoned sites, or a one time cleanup of a site that does not normally generate hazardous waste. If you have any questions, please call me at 744-6100 ext. 383.

Sincerely,

Elizabeth Knauss
Environmental Manager

**FLORIDA DEPARTMENT OF ENVIRONMENTAL PROTECTION
DIVISION OF LAW ENFORCEMENT**

Bureau of Emergency Response

INITIAL REPORT OF EMERGENCY RESPONSE INCIDENT

Incident Number: <u>96-SW-0013</u>		County: <u>Pinellas</u>		BER Region: <u>SW</u>	Date of Incident: <u>1/6/96</u>	Time of Incident: <u>?</u>
Date Reported to BER: <u>1/8/96</u>	Time Reported to BER: <u>9:40</u>	BER Employee Receiving Initial Report: <u>Jamie Aclea</u>		BER Location Initial Report Received: <u>Tampa</u>		
Incident Reported By: <u>Bob Bayett</u>		Affiliation: <input type="checkbox"/> SWP <u>Hawco</u>		Phone Number (include area code): <u>(813)-327-8467</u>		
Address of Reporting Party (include city, state, & zip): <u>843 43rd St. S., St. Petersburg, FL 33711</u>					Alternate Phone Number: <u>(800)-435-8467</u>	
Location of Incident: <u>843 43rd St. S.</u>						
Nearest City/Town: <u>St. Petersburg</u>				Latitude: <u>-</u>	Longitude: <u>-</u>	
Type of Incident: <input type="checkbox"/> Fire <input checked="" type="checkbox"/> Spill <input type="checkbox"/> Dumping <input type="checkbox"/> Complaint <input type="checkbox"/> Air Release <input type="checkbox"/> Abandoned drum <input type="checkbox"/> _____	BER Help Requested: <input checked="" type="checkbox"/> None <input type="checkbox"/> Referral <input type="checkbox"/> On-Scene <input type="checkbox"/> Phone Only <input type="checkbox"/> Follow-up Later <input type="checkbox"/> _____	Media Affected: <input type="checkbox"/> Air <input type="checkbox"/> Soil <input type="checkbox"/> Ditch <input type="checkbox"/> Beach <input type="checkbox"/> Storm Drain <input type="checkbox"/> Wells Nearby	Mode: <input type="checkbox"/> Rail <input type="checkbox"/> Coastal <input checked="" type="checkbox"/> Facility <input type="checkbox"/> Pipeline <input type="checkbox"/> Highway <input type="checkbox"/> Waterway <input type="checkbox"/> Residential <input type="checkbox"/> _____	Incident Description: <input checked="" type="checkbox"/> Valve Leak <input type="checkbox"/> Vehicle Accident <input type="checkbox"/> Vessel Discharge <input type="checkbox"/> Abandoned Drum(s) <input type="checkbox"/> UST/AST Tank Leak <input type="checkbox"/> UST/AST Tank Overfill <input type="checkbox"/> Vehicle Fuel Tank Leak <input type="checkbox"/> _____	Actions: <input type="checkbox"/> None Taken <input checked="" type="checkbox"/> Booms/Dikes <input checked="" type="checkbox"/> Leak Stopped <input type="checkbox"/> Soil Removed <input type="checkbox"/> Absorbent Used <input type="checkbox"/> Contractor Hired <input type="checkbox"/> Fire Extinguished <input type="checkbox"/> _____	
<input type="checkbox"/> Ground Water <input type="checkbox"/> Surface Water: _____ <input type="checkbox"/> <u>No media affected</u>						
Responsible Party: <u>Hawco Environmental</u>		Contact Person (include title): <u>Bob Bayett</u>		Phone Number (include area code): <u>(813)-327-8467</u>		
Responsible Party's Address (include city, state, zip): <u>843 43rd St. S., St. Petersburg, FL 33711</u>				Alternate Phone Number: <u>(800)-435-8467</u>		
Material: <u>Oil</u>		Amount: <u>35</u>		Category Code (see below): <u>01</u>		
				<input type="checkbox"/> gal. <input type="checkbox"/> lbs.		
				<input type="checkbox"/> gal. <input type="checkbox"/> lbs.		
				<input type="checkbox"/> gal. <input type="checkbox"/> lbs.		
				<input type="checkbox"/> gal. <input type="checkbox"/> lbs.		
Category Codes (choose one, most specific category for each material above, and enter the code on the appropriate box):						
01 Oil	05 Paint	09 Chlorine	13 Oxidizer	17 Sewage	21 PCB	
02 Fuel	06 Solvent	10 Ammonia	14 Reactive	18 Wastewater	22 Fertilizer	
03 Crude Oil	07 Flammable (misc.)	11 Gas (not NH3 or CL2)	15 Explosive	19 Radioactive	23 Biohazard	
04 Petroleum (misc.)	08 Poison (misc.)	12 Pesticide/Herbicide	16 Corrosive	20 Solid Waste	24 Unknown	
25 _____						
Responding Agencies: <input type="checkbox"/> EPA <input type="checkbox"/> FMP <input type="checkbox"/> USCG <input type="checkbox"/> Police/Sheriff <input type="checkbox"/> FHP <input type="checkbox"/> GFC <input type="checkbox"/> Local EM <input type="checkbox"/> Local Program <input type="checkbox"/> HRS <input type="checkbox"/> DOT <input type="checkbox"/> Fire Dept. <input type="checkbox"/> Local Road Dept. <input type="checkbox"/> _____			Agencies Notified: <input type="checkbox"/> EPA <input type="checkbox"/> GFC <input type="checkbox"/> NRC <input type="checkbox"/> Local EM <input type="checkbox"/> SWP <input type="checkbox"/> FMP <input type="checkbox"/> TBER <input type="checkbox"/> Local Program <input type="checkbox"/> HRS <input type="checkbox"/> DOT <input type="checkbox"/> USCG <input type="checkbox"/> Local Road Dept. <input type="checkbox"/> _____			
Narrative: <u>A broke pipe caused a stream of oil to be released into the wind causing a mist of oil that covered the building and the streets. No puddles of free product occurred.</u>						
Non-DEP Contractor Used: <input checked="" type="checkbox"/> No <input type="checkbox"/> Yes (Name: _____)		Follow-up referred to:		Incident copies sent to:		
BER Response: <input type="checkbox"/> Yes (attach investigative report) <input checked="" type="checkbox"/> No		Signature of Regional Employee: <u>Jamie Aclea</u>			Date: <u>1/10/96</u>	



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

DER Form #	17-770.500(1)
Form Title	Petroleum or Petroleum Product Contamination Report Form
Effective Date	February 23, 1990
DER Application No.	(Filled in by DER)

Petroleum or Petroleum Product Contamination Report Form

DER Facility ID: FLO 152 762 767
Facility Name: HOWCO ENVIRONMENTAL SERVICES
Facility Address: 843 43 RD ST SOUTH
ST PETER FL 33711
County: PINELLAS
Other Names for this Site: _____

Contact Person's Name: BOB BOYETT
Contact Person's Phone No.: 800 435 8467
Contact Person's Address: SAME

Date of Discovery: 1-6-95
Type of Product Discharged: USED OIL
Estimated Amount of Product Lost: 35-50
How did Discharge occur? (Tank leak, Pipe leak, Truck Accident, Explosion, etc.) PIPE BROKE SPENDING
A STREAM OF OIL UP INTO THE WIND WHICH CAUSED A
MIST OF OIL COVERING THE THE AREA OUTSIDE OUR
FENCE. THE OIL COVERED THE STREET & BUILDING. NO PUDDLES
What has been done to prevent a further Discharge? TANK & PIPES ARE UNDER REPAIR

To the best of my knowledge, all information on this form is true, accurate, and complete.

Bob Boyett
Signature of Owner, Authorized Representative, Operator

BOB BOYETT
Print Name of Owner or Operator

Date 1-8-95

Submit this form to the appropriate district office at the address below:

KEEP A COPY OF THIS FORM FOR YOUR RECORDS.



TOTAL P. 03

Florida Department of Environmental Regulation

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

DER Form #	17-761,800(1)
Form Title	Discharge Reporting Form
Effective Date	December 10, 1990
DER Application No.	(Filed in by DER)

Discharge Reporting Form

Use this form to notify the Department of Environmental Regulation of:

1. Results of tank tightness testing that exceed allowable tolerances within ten days of receipt of test result.
2. Petroleum discharges exceeding 25 gallons on pervious surfaces as described in Section 17-761.460 F.A.C. within one working day of discovery.
3. Hazardous substance (CERCLA regulated), discharges exceeding applicable reportable quantities established in 17-761.460(2) F.A.C., within one working day of the discovery.
4. Within one working day of discovery of suspected releases confirmed by: (a) released regulated substances or pollutants discovered in the surrounding area, (b) unusual and unexplained storage system operating conditions, (c) monitoring results from a leak detection method or from a tank closure assessment that indicate a release may have occurred, or (d) manual tank gauging results for tanks of 550 gallons or less, exceeding ten gallons per weekly test or five gallons averaged over four consecutive weekly tests.

Mail to the DER District Office in your area listed on the reverse side of this form

PLEASE PRINT OR TYPE
Complete all applicable blanks

1. DER Facility ID Number: FLD 152762767 2. Tank Number: 120 3. Date: 1-8-95
4. Facility Name: HOWCO ENVIRONMENTAL SERVICES
Facility Owner or Operator: TIM HAGAN OWNER MARK SCHAEFER PLANT MANAGER
Facility Address: 843 47 RD ST SOUTH
Telephone Number: (800) 435 8467 County: PINELAS
Mailing Address: SAME
5. Date of receipt of test results or discovery: 1-6-95 month/day/year
6. Method of initial discovery. (circle one only)
A. Liquid detector (automatic or manual) B. Vapor detector (automatic or manual) C. Tightness test (underground tanks only).
D. Emptying and inspection. E. Inventory control. F. Vapor or visible signs of a discharge in the vicinity. G. Closure (explain) H. Other
7. Estimated number of gallons discharged: 35-50 GALLONS
8. What part of storage system has leaked? (circle all that apply) A. Dispenser B. Pipe C. Fitting D. Tank E. Unknown
9. Type of regulated substance discharged. (circle one)
A. leaded gasoline B. unleaded gasoline C. gasohol D. vehicular diesel E. aviation gas G. jet fuel
L. used/waste oil M. diesel O. new/lube oil V. hazardous substance includes pesticides, ammonia, chlorine and derivatives (write in name or Chemical Abstract Service CAS number) Z. other (write in name)
10. Cause of leak. (circle all that apply)
A. Unknown B. Split C. Loose connection D. Corrosion E. Puncture F. Installation failure G. Spill H. Overfill I. Other (specify)
11. Type of financial responsibility. (circle one)
A. Third party insurance provided by the state insurance contractor B. Self-insurance pursuant to Chapter 17-769.500 F.A.C. C. Not applicable D. None
12. To the best of my knowledge and belief all information submitted on this form is true, accurate, and complete.

BOB BOYETT
Printed Name of Owner, Operator or Authorized RepresentativeBob Boyett
Signature of Owner, Operator or Authorized Representative

Conf



Lawton Chiles
Governor

Florida Department of Environmental Protection

Southwest District
3804 Coconut Palm Drive
Tampa, Florida 33619
813-744-6100

Virginia B. Wetherell
Secretary

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

MAY 31 1994

Mr. Tim Hagan
Howco Environmental Services
843 43rd St. S.
St. Petersburg, FL 33711

RE: Howco Environmental Services
Pinellas County
EPA ID NO.: FLD152764767

WARNING LETTER #94-0062HW52SWD

Dear Mr. Hagan:

A hazardous waste compliance inspection was conducted at your facility on March 15, 1994. This inspection was conducted under the authority of Section 403.091, Florida Statutes, and Chapter 403, Part IV, Florida Statutes, in order to determine the compliance status of your facility with Title 40 Code of Federal Regulations Parts 260 through 268, as adopted in Florida Administrative Code Chapter 17-730.

During this inspection, possible violations of rules regarding hazardous waste management were noted. These possible violations are described in the "Summary of Violations" section of the attached inspection report.

You are advised that any activity at your facility that may be contributing to violations of the above described statutes and rules should be ceased immediately. Operation of a facility in violation of State statutes or rules may result in liability for damages and restoration, and the judicial imposition of civil penalties up to \$50,000 per violation per day pursuant to Section 403.727, Florida Statutes.

You are requested to contact Randall Strauss of this office at (813) 744-6100, ext. 387, within ten (10) calendar days of receipt of this Warning Letter to discuss the issues raised in this Warning Letter and your plans regarding corrective actions.

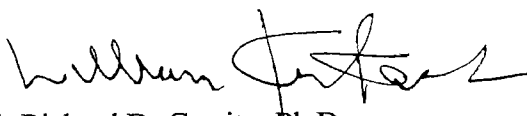
PLEASE BE ADVISED that this Warning Letter is part of an agency investigation preliminary to agency action in accordance with Section 120.57 (4), Florida Statutes. The purpose of this letter is to advise you of potential violations and to set up a meeting to discuss possible resolutions to any potential violations that may have occurred for which you may be responsible. If you take acceptable corrective

Howco Environmental Services
Warning Letter #94-0062HW52SWD

actions within 90 days of the date of the inspection report, the Department will not seek penalties from you. However, if you do not take appropriate corrective action within 90 days, under the Department's agreement with the United States Environmental Protection Agency (EPA), a formal administrative complaint or "Notice of Violation" (NOV) must be issued against you within 150 days of the date of the attached inspection report. If the Department issues a Notice of Violation, and you are named as a party, you will be informed of your rights to contest any determination made by the Department in the Notice of Violation.

If after further investigation, the Department determines that the violations occurred and you have not taken timely corrective actions, this matter may be amicably resolved only through the entry of a Consent Order, which will include a compliance schedule and an appropriate penalty.

Sincerely,


Richard D. Garrity, Ph.D.
Director of District Management
Southwest District

RDG/rhs

Enclosure

cc: Janet Ashwood, HWR, FDEP
Alan Farmer, USEPA, Region IV
Charlie Ryburn, Pinellas Co. DEM
Compliance File



Lawton Chiles
Governor

Florida Department of Environmental Protection

Southwest District
3804 Coconut Palm Drive
Tampa, Florida 33619
813-744-6100

Virginia B. Wetherell
Secretary

HAZARDOUS WASTE INSPECTION REPORT

1. INSPECTION REPORT COMPLAINT X ROUTINE FOLLOW-UP PERMITTING

FACILITY NAME Howco Environ./Tim's Oil Recovery DEP/EPA ID #FLD152764767
#FLD108304379

STREET ADDRESS 843 43rd St. S., St. Petersburg, FL 33711

MAILING ADDRESS Same

COUNTY Pinellas PHONE (813)323-0818 DATE 3/15/94 TIME 0800-1400

TYPE OF FACILITY:

Generator	Storage	Treatment
<u>Generator (>1000 kg/month)</u>	<u>Container</u>	<u>Tank</u>
<u>SQG (100-1000 kg/month)</u>	<u>Tank</u>	<u>Land Treatment</u>
<u>X CESQG (<100 kg/month)</u>	<u>Waste Pile</u>	<u>Thermal</u>
	<u>Surface Impoundment</u>	<u>Chem/Phys/Bio</u>
Transporter		<u>Incinerator</u>
<u>X Transporter</u>	Disposal	<u>Surf. Impound.</u>
<u>Transfer Facility</u>	<u>Landfill</u>	
	<u>Surface Impoundment</u>	
	<u>Waste Pile</u>	
<u>Non-Handler</u>		
<u>X Used Oil Management Activity</u>		

2. APPLICABLE REGULATIONS:

40 CFR 261.5 40 CFR 262 40 CFR 263 40 CFR 264
40 CFR 265 X 40 CFR 266 40 CFR 268 17-730, F.A.C.
X 17-710, F.A.C.

3. RESPONSIBLE OFFICIAL:

Name: Tim Hagan, owner

4. SURVEY PARTICIPANTS AND PRINCIPAL INSPECTOR:

Name: Randy Strauss, Roger Evans - FDEP; Dick King - Howco

5. FACILITY LATITUDE:

27°54'00"

LONGITUDE:

82°38'11"

6. TYPE OF OWNERSHIP: FEDERAL STATE COUNTY MUNICIPAL PRIVATE

7. PERMIT NO.: N/A

Issue Date:

Exp. Date:

8. PROCESS DESCRIPTION:

This facility is doing business under the names Howco Environmental Services and Tim's Oil Recovery and currently employs 34 people. The major part of the business consists of the collection, recycling and marketing of used oil. The facility also operates a wastewater treatment unit (WWTU) that treats water separated during the used oil recycling process, as well as petroleum contaminated wastewaters accepted from off-site. Other activities include draining and crushing used oil filters, and collection and arranging disposal of petroleum contaminated soils.

The facility has registered with the Department under both names as a transporter, collector, and recycler of used oil; and has notified EPA using the name Tim's Oil Recovery as a marketer of used oil. Certification of insurance coverage and submittal of a training program for a used oil transporter per 17-710, Florida Administrative Code (F.A.C.), has been provided under both names. Proof of financial responsibility as a hazardous waste transporter in accordance with the requirements of Rule 17-730.170, F.A.C., has been submitted to the Department under the name Hagan Holding Company d/b/a Tim's Oil Recovery effective through July 2, 1994. The facility currently has interim status, but has requested withdrawal of its Part A application stating that it was submitted as a protective filing only. A contamination assessment of the 3-acre site is currently in process in accordance with the Department's "Corrective Actions for Contamination Site Cases."

The oil recycling process is the same as described in previous inspection reports and essentially consists of separating water and solids from the oil. Most of the oil is collected on established routes serviced by the facility's seven transport tanker trucks which range in capacity from 2500 to 4000 gallons. The facility also has ten 8000-gallon semi-trailers which are used for bulk shipments. Oil is also piped to the recycling process from a drain and sump system that collects drainage from a truck wash area and the filter crushing operation. Solids separated from the oil using a vibratory screen filter are mixed with sludge from the WWTU and fed into a filter press. The disposition of the filter press sludge is described below. The liquids removed by the filter press are fed back into the system via the same plumbing used for the truck wash.

The recycled oil is tested for the parameters specified in 40 CFR 266.40(e) before shipment to customers. Most of the oil is sold to asphalt plants to be used for heating aggregate. Dick King said that presently all oil shipped is "on-spec" and estimated that it has been at least four years since the facility has shipped any "off-spec" oil for burning. In the past, "off-spec" oil was sold to Ajax Paving and Howco had copies of notifications to EPA from Ajax plants in Ft. Myers and Englewood as burners of "off-spec" oil.

March 1994

The filter press sludge is added to petroleum contaminated soils which are stockpiled on a concrete pad at the southwest corner of the facility. The stockpile is periodically mixed using a Bobcat loader until enough material is accumulated for shipment - usually about 400 tons. The stockpile is not covered and drainage from the pile is controlled by soil diking and french drains which route it to the truck wash collection system. Howco has disposed of the last two shipments at Chambers Landfill, Okeechobee, and provides analyses for their approval prior to disposal. Although Chambers specifies the analyses to be run, Dick King said Chambers provides no specific criteria, but gives a verbal approval based on the results of each batch.

Results provided for the last 2 shipments for TCLP/metals and volatile aromatics (EPA Method 8020) show no hazardous constituents were detected above regulated levels. Total halogens were also analysed and for the most recent shipment were 685 mg/kg, even though all the chlorinated compounds analysed by the 8020 method were below detectable limits, i.e. 0.01 mg/kg. The results for total halogens indicate that a more detailed analysis for specific halogenated compounds should be performed on this material (e.g. 8010/8120) to determine if any chlorinated TCLP constituents could be present above regulated levels. The analysis that was performed, EPA Method 5050/9252, actually reports concentration of total chloride and does not distinguish whether it is from an organic or inorganic source, therefore, if the result is due to an organic source the concentration of a specific compound, based on its weight, could be many times the 685 mg/kg number reported.

The WWTU receives water that has been separated from used oil during the recycling process, as well as petroleum contaminated water from off-site sources such as tank bottoms from USTs and terminals, stormwater from terminals, petroleum tank cleanings, and ship bilges. Hydrocarbons are oxidized in the system using chlorination and potassium permanganate. Solids are removed via dissolved air flotation and are piped to the filter press and eventually added to the soil stockpile as described above. The effluent is passed through a sand and carbon filter followed by air strippers prior to discharge to a City of St. Petersburg POTW. Dick King said the sand and carbon are periodically changed-out and added to the petroleum-contaminated soil/WWTU sludge stockpile.

A spot-check of analyses for incoming and outgoing loads, registrations, insurance, and training records revealed no problems other than one incoming load analysed at 1500 ppm total halogens. The problem was tracked to one customer who had mixed a chlorinated solvent with his waste oil but it was not detected with the vapor analyser used by the driver. Further checks revealed that the material was detectable, however, with a colorimetric test kit also carried by the drivers. The kit is usually only used to confirm high halogens detected by screening with the vapor instrument. The customer was advised to stop the

March 1994

practice and the driver instructed to screen this customer's oil with the test kit in the future.

9. SUMMARY OF VIOLATIONS:

40 CFR 262.11

Failure to determine if solid waste carbon, sand filter media, and used oil solids meet the definition of hazardous waste.


Report Prepared By:


Randall H. Strauss

Environmental Specialist II

Date: 5/23/94

Approved By:


Elizabeth Knauss

Environmental Specialist III

Date: 5/23/94

Date

3/15/94

Inspector

K. Strauss

Facility ID#

FD152764767

Howco

FD108304379

Tim's Oil.

RCRA COMPLIANCE INSPECTION REPORT
SMALL QUANTITY GENERATOR'S CHECKLIST

1. Has the Generator determined that he is a hazardous waste generator (262.11)?

☐ Yes ☒ No

2. Does the Generator accumulate hazardous waste on-site of more than a total of 100L Kg/mo or 1 Kg/mo of acutely toxic waste (or 100 Kg/mo of their spill residue)?

Need to do AW determination on WWTU filter media & used oil solids.
UNK ☐ No ☐ Yes

3. Does the Generator treat or dispose of his hazardous waste on-site?

☒ No ☐ Yes

4. Does the Generator have an IW permit? IW ID#

☒ No ☐ Yes

5. Does the Generator delivery his hazardous waste to an approved storage, treatment or disposal facility or industrial waste permitted facility?

☐ Yes ☐ No

UNKNOWN IF GENERATING HW
Note in narrative where shipped, amounts, kinds of hazardous waste.

6. Is the area managed to prevent fire, explosion or contamination of the environment?

☒ Yes ☐ No

Note in narrative any unusual circumstances, potential problems, or recommendations.

Date 3/15/04
Inspector R. Strauss
Facility ID# FD108304379

TRANSPORTERS CHECKLIST

I. SITE NAME: Tim's Oil Recovery

II. TRANSPORTER REQUIREMENTS (40 CFR 263)

1. Do vehicles transporting hazardous waste have the appropriate placards? (263.10) (49 CFR 172.500) ☒ Yes ☐ No
Placards are available, but not presently transporting HW.
2. Does transporter have an EPA identification number? (263.11(a)) ☒ Yes ☐ No
3. Does the transporter use manifest system as required by 263.20? ☒ Yes ☐ No
Not presently transporting HW.
Do the manifests contain at least:
 - a. Name, address, and EPA ID of transporter? ☐ Yes ☐ No
 - b. Name, address, and EPA ID 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
 - h. EPA waste codes? ☐ Yes ☐ No

DATE 7/17/94
FACILITY ID 420108304379

4. International shipments: (263.20(g)) ☒ N/A
- a. Record of date waste left U.S.? ☐ Yes ☐ No
- b. Presence of one signed copy in records? ☐ Yes ☐ No
- c. Signed copy of manifest returned to the generator? ☐ Yes ☐ No
- d. Copy of the manifest given to a U.S. Customs official at the point of departure from the United States? ☐ Yes ☐ No
5. For SQG waste:
- a. Is waste transported according to reclamation agreement? N/A ☐ Yes ☐ No
- b. Is following information recorded on a shipping paper:
- | | | |
|--|------------------------------|-----------------------------|
| Name, address, and EPA ID of waste generator | <input type="checkbox"/> Yes | <input type="checkbox"/> No |
| Quantity of waste accepted | <input type="checkbox"/> Yes | <input type="checkbox"/> No |
| DOT - required shipping info | <input type="checkbox"/> Yes | <input type="checkbox"/> No |
| Date waste is accepted | <input type="checkbox"/> Yes | <input type="checkbox"/> No |
- c. Does transporter carry this shipping paper during transport? N/A ☐ Yes ☐ No
- d. Are records maintained for three years after termination or expiration of reclamation agreement? N/A ☐ Yes ☐ No
6. Are copies of the manifest retained for 3 years? (263.22) N/A ☐ Yes ☐ No
7. Is there evidence of discharge of hazardous waste? (263.30) ☐ Yes ☒ No
8. Has transporter demonstrated the financial responsibility required under 17-30.170(2) ☒ Yes ☐ No
9. Does the transporter verify financial responsibility with the Department annually (17-730.170(3))? ☒ Yes ☐ No

III. TRANSFER FACILITY REQUIREMENTS (17-730.171)

- A. Does transporter comply with 10 day storage limit for transfer facilities? (263.12) ☐ Yes ☐ No
1. Is the hazardous waste packaged according to 262.30? (263.12) ☐ Yes ☐ No

B. General Facility Standards (265 Subpart B)

1. Security (265.14)

- a. Is the facility security system adequate to minimize unauthorized entry? Yes No
- b. Are signs posted and legible for 25 feet? Yes No

2. Inspection Requirement (265.15)

- a. Does the facility have a copy of the Inspection Plan? Yes No
- b. Does the facility have completed inspection logs? Yes No
- c. Were the deficiencies corrected in a timely manner? Yes No
- d. Are the inspection logs maintained at the facility for 3 years? Yes No

3. Personnel Training (265.16)

- a. Do management personnel complete hazardous waste training? Yes No
- Is training on the job? Yes No
- Is training in the classroom? Yes No
- b. Do laborers who handle hazardous waste complete training? Yes No
- Is training on the job? Yes No
- Is training in the classroom? Yes No
- c. Does training include:
- Emergency response procedures? Yes No
- Inspection procedures? Yes No
- Operation of hazardous waste handling equipment? Yes No
- d. How often is training reviewed? _____
- e. Does the facility have personnel training records including:
- Job title and description of position? Yes No
- Description of employee's training. Yes No

DATE 3/15/94
FACILITY ID PCD 108 309 379

- N/A
- f. Is training successfully completed within 6 months of hiring/transfer to HW position? N/A ☐ Yes ☐ No
- g. Are records maintained for three years at the facility? ☐ Yes ☐ No
4. Ignitable, Reactive, or Incompatible Waste (265.17)
- a. Is the waste separated and confined from sources of ignition or reaction, sparks, spontaneous ignition, and radiant heat? ☐ Yes ☐ No
- b. Are "No Smoking" signs posted in the area? ☐ Yes ☐ No
- C. Preparedness and Prevention (265 Subpart C)
1. Is there evidence of fire, explosion or contamination of the environment? (265.31 - Maintenance and Operation of Facility) ☐ Yes ☐ No
- If yes, use narrative explanation.
2. Is the facility equipped with (265.32 - required equipment):
- a. Internal communications or alarm system? ☐ Yes ☐ No
Is it easily accessible in case of emergency? ☐ Yes ☐ No
- b. Telephone or two-way radio to call emergency response personnel? ☐ Yes ☐ No
- c. Portable fire extinguishers, fire control equipment, spill control equipment and decontamination equipment? ☐ Yes ☐ No
- Is this equipment tested to assure its proper operation? ☐ Yes ☐ No
- How frequently? _____
- d. Water of adequate volume for hoses, sprinklers or water spray system? ☐ Yes ☐ No
- (1) Describe source of water. _____
- (2) Indicate flow rate and/or pressure and storage capacity, if applicable. _____

DATE 3/15/94
FACILITY ID FD108304379

3. Is there sufficient aisle space to allow unobstructed movement of personnel and equipment? (e.g., adequate aisle space in between barrels to check for leakage, corrosion and proper labeling, etc.) (265.35 - Required Aisle Space) N/A ☐ Yes ☐ No

4. Has the owner/operator made arrangements with the local authorities to familiarize them with characteristics of the facility? (Layout of facility, properties of hazardous waste handled and associated hazards, places where facility personnel would normally be working, entrances to roads inside facility, possible evacuation routes.) (265.37 - Arrangements with Local Authorities) N/A ☐ Yes ☐ No

If N/A, explain _____

5. In the case that more than one police or fire department might respond, is there a designated primary authority? (265.37 - Arrangements with Local Authorities) N/A ☐ Yes ☐ No

If yes, indicate primary authority. _____

Is the fire department a city or volunteer fire department? _____

6. Does the owner/operator have phone number of and agreements with state emergency response teams, emergency response contractors and equipment suppliers? (265.37 - Arrangements with Local Authorities) ☐ Yes ☐ No

Are they readily available to the emergency coordinator? ☐ Yes ☐ No

7. Has the owner/operator arranged to familiarize local hospitals with the properties of hazardous waste handled and types of injuries that could result from fires, explosions, or releases at the facility? (265.37 - Arrangements with Local Authorities) ☐ Yes ☐ No

If no, has the owner/operator attempted to do this?

8. If the State, or local authorities decline to enter into the above referenced agreements, has this been documented in the operation record? (265.37 - Arrangements with Local Authorities) ☐ Yes ☐ No

DATE 1/15/94FACILITY ID FLD 08304379

C. Contingency Plan and Emergency Procedures (265 Subpart D)

1. Does the facility have a contingency plan?
(265.51 - Purpose and Implementation of
Contingency Plan) ___Yes ___No
2. Is it maintained at the facility?
(265.53 - Copies of Contingency Plan) ___Yes ___No
3. Is the contingency plan a revised SPCC Plan
(265.52 - Content of Contingency Plan) ___Yes ___No
- a. Does the plan include:
- (1) Action personnel will take? ___Yes ___No
- (2) Evacuation routes? ___Yes ___No
- (3) Emergency Equipment? ___Yes ___No
- (4) Is the emergency equipment properly
inspected and maintained? ___Yes ___No
4. Is there an emergency coordinator on site or
within short driving distance of the plant at
all times? (265.55 - Emergency Coordinator) ___Yes ___No
5. Who is the emergency coordinator? _____
6. Has the facility supplied local police and fire
departments with a copy of the contingency plan?
(265.53(b) - Content of Contingency Plan) ___Yes ___No

D. Container Storage Checklist

(Subpart I - Use and Management of Containers 265.170)

1. Are the containers in good condition (265.171)?
(check for leaks, corrosion, bulges, etc.) ___Yes ___No
2. If a container is found to be leaking, does the
operator transfer the hazardous waste from the
leaking container? ___Yes ___No
3. Is the waste compatible with the containers
and/or its liner? (265.172) ___Yes ___No

DATE

FACILITY ID

3/15/94

42D/08304379

4. Are containers holding hazardous waste opened, handled or stored in such a manner as to cause the container to rupture or leak? (265.173)

W/A
____Yes ____No

If yes, explain using narrative.

5. Are each of the containers inspected at least weekly (265.174)?

____Yes ____No

If no, explain using narrative concerning the frequency of inspection.

6. Are containers holding ignitable or reactive wastes located at least 15 meters (50 feet) from the facility property line? (265.176)

____Yes ____No

If yes, explain using narrative.

7. Are incompatible wastes stored in the same containers?

____Yes ____No

If yes, explain using narrative.

8. Are containers holding incompatible wastes kept apart by physical barrier or sufficient distance?

____Yes ____No

If no, explain using narrative.

- E. Does facility have a written closure plan satisfying requirements of closure performance, notification, and decontamination standards of 40 CFR 265.111, 265.112(c), 265.114, 265.115? (17-30.171(2)(b))

____Yes ____No

- F. Is hazardous waste that is stored in containers or vehicles stored on a man made surface which is capable of preventing spills or releases to the ground? (17-730.171(2)(d))

____Yes ____No

- G. Is a written log maintained for all waste entering or leaving the transfer facility? (17-730.171(2)(e))

____Yes ____No

Does the log contain:

Generators' names?

____Yes ____No

Manifest numbers?

____Yes ____No

Dates when waste enters and leaves facility?

____Yes ____No

DATE 3/15/94
FACILITY ID FD 108 304 379

H. Has the facility notified the department on Form 17-730.900(6) (Transfer facility notification form)? (17-730.171(3))

N/A Yes No

I. Does the transfer facility have an EPA/DER ID number?

N/A Yes No

IV. UNREGULATED WASTES (HOUSEHOLD/CONDITIONALLY EXEMPT SMALL QUANTITY GENERATOR WASTES)

 N/A

1. Does the transporter have documentation that this waste was generated by an unregulated source?

☒ Yes No

2. If no, is the transporter assuming responsibility as the generator of this waste?

 Yes No

a. If yes, complete the applicable Generator or Small Quantity Generator checklist.

b. If no, the inspector should inform the transporter that he will be held responsible as the generator of the waste and will be reinspected to ensure that the applicable requirements are being satisfied. A follow-up inspection should be scheduled as follows:

i) 90 days after initial inspection if the quantity of "unregulated" wastes on site exceed 1000 kg.

ii) 180 days after initial inspection if the quantity of "unregulated" wastes on site are less than 1000 kg.

3. Does the transporter mix/consolidate hazardous wastes of different DOT shipping descriptions 263.10(c)(2)?

 Yes ☒ No

If yes, complete the Generator checklist.

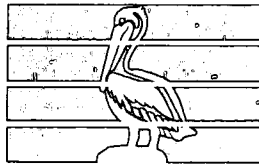
V. LAND BAN WASTE

1. Does the transporter manage restricted (land ban) wastes?

If yes, check appropriate box(es).

"California List"
F--- List

Failed to make a HW determination on some solid wastes.
UNK Yes ☒ No



CITY OF ST. PETERSBURG

March 4, 1994

Randy Strauss.
Division of Waste Management
Hazardous Waste Compliance Section
Florida Department of Environmental Protection
3804 Coconut Palm Drive
Tampa, Florida 33619

Dear Randy:

As you requested, enclosed is the report of laboratory analyses for samples collected at Howco Environmental as part of our pretreatment monitoring program. At the time of the violations Howco's stripper was malfunctioning due to lack of maintenance. Since February 2, 1994 a second stripper has been added and the facility has returned to compliance.

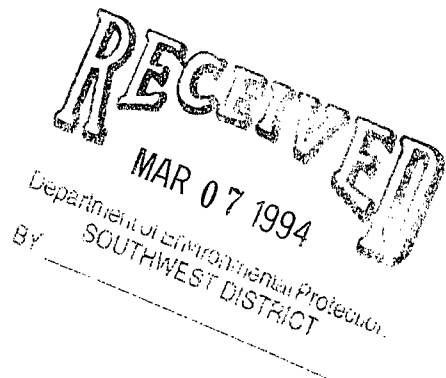
Does Howco have an air permit for the two strippers? If you require additional information, or have any questions regarding this submission, please contact me at (813) 893-7261.

Sincerely,

Janet G. DeBiasio
Environmental Specialist
Water Quality Assessment
Public Utilities Department

Enclosures

xc: WQAD File



HOWCO ENVIRONMENTAL

PROJECT ID: PRETREATMENT VOC's

sample #			9401111	9401110	9401075	9401074	9401030	9401014	9401013	9400994	9400993	9400973	9400972	9400947	9400890	
Site #:			#161	#161	#161	#161	#161	#161	#161	#161	#161	#161	#161	#161	#161	
Batch#:			34	34	34	34	34	34	34	34	34	34	34	34	34	
Run Date:			02/20/94	02/20/94	02/20/94	02/20/94	02/20/94	02/20/94	02/20/94	02/20/94	02/20/94	02/12/94	02/11/94	02/11/94	02/20/94	
Dilution Factor:			20	20	20	20	20	20	20	20	20	40	40	40	20	
Sample Date:			02/16/94	02/16/94	02/15/94	02/15/94	02/13/94	02/12/94	02/12/94	02/11/94	02/11/94	02/10/94	02/10/94	02/09/94	02/07/94	
ROW No.	PARAM. ID: [1]	ANALYTE NAME TEST METHOD# 624	MDL * UG/L	UG/L	UG/L	UG/L	UG/L	UG/L	UG/L	UG/L	UG/L	UG/L	UG/L	UG/L	UG/L	
26		M+P-XYLENE	1	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	
27		O-XYLENE	1	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	
20		trans-1,3-DICHLOROPROPENE	1	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	
36		1,4-DICHLOROBENZENE	1	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	
35		1,3-DICHLOROBENZENE	1	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	
38		NAPHTHALENE	1	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	
32		1,3,5-TRIMETHYLBENZENE	1	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	
29		ISOPROPYLBENZENE	1	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	
30		N-PROPYLBENZENE	1	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	
34		sec-BUTYLBENZENE	1	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	
37		1,2-DICHLOROBENZENE	1	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	
33		1,2,4-TRIMETHYLBENZENE	1	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	
39		METHYL-TERT-BUTYLETHER	1	2,244	1,632	761	901	571	668	670	727	736	639	449	512	
5		TRICHLOROFLUOROMETHANE	1	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	
40	1 V	ACROLEIN (Screen)	100	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	
41	2 V	ACRILONITRILE (Screen)	100	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	
13	3 V	BENZENE	1	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	
28	5 V	BROMOFORM	1	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	
12	6 V	CARBON TETRACHLORIDE	1	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	
24	7 V	CHLOROBENZENE	1	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	
23	8 V	CHLORODIBROMOMETHANE	1	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	
4	9 V	CHLOROETHANE	1	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	
42	10 V	2-CHLOROETHYL VINYL ETHER	1	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	
10	11 V	CHLOROFORM	1	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	
17	12 V	DICHLOROBROMOMETHANE	1	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	
9	14 V	1,1-DICHLOROETHANE	1	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	
14	15 V	1,2-DICHLOROETHANE	1	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	
6	16 V	1,1-DICHLOROETHYLENE	1	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	
16	17 V	1,2-DICHLOROPROPANE	1	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	
18	18 V	1,3-DICHLOROPROPYLENE	1	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	
25	19 V	ETHYLBENZENE	1	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	
3	20 V	METHYL BROMIDE (Bromomethane)	1	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	
1	21 V	METHYL CHLORIDE (Chloromethane)	1	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	
7	22 V	METHYLENE CHLORIDE	1	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	
31	23 V	1,1,2,2-TETRACHLOROETHANE	1	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	
22	24 V	TETRACHLOROETHYLENE	1	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	
19	25 V	TOLUENE	1	77	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	
8	26 V	1,2-TRANS-DICHLOROETHYLENE	1	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	
11	27 V	1,1,1-TRICHLOROETHANE	1	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	
21	28 V	1,1,2-TRICHLOROETHANE	1	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	
15	29 V	TRICHLOROETHYLENE	1	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	
2	31 V	VINYL CHLORIDE	1	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	
VIOLATIONS SHADED			SUM	2,321	1,632	761	901	571	668	670	727	736	639	624	460	612
SUM OF REGULATED CMPDS				77	0	0	0	0	0	0	0	0	0	0	0	0
TOTAL BTEX (bolded)				77	0	0	0	0	0	0	0	0	0	0	0	0
FILE:howco3.WK3																
* - The Correct MDL = the MDL times the dilution factor.																
** - Sent to outside lab for verification.																

HOWCO ENVIRONMENTAL PROJECT ID: PRETREATMENT VOC's

Sample #		9400854	9400836	9400814	9400779	9400739	9400718	9400696	9400680	9400663	9400662	9400635	9400614	9400534	9400517
Site #:		#161	#161	#161	#161	#161	#161	#161	#161	#161	#161	#161	#161	#161	#161
Batch#:		34	34	33	33	33	33	33	33	33	33	33	33	33	33
Run Date:			02/11/94	02/05/94	02/06/94	02/05/94	02/03/94	02/03/94	02/02/94	02/02/94	02/02/94	02/02/94	02/02/94	02/02/94	02/02/94
Dilution Factor:			40	40	40	40	1	20	40	40	40	40	40	40	40
Sample Date:			02/05/94	02/04/94	02/03/94	02/02/94	02/01/94	01/31/94	01/30/94	01/29/94	01/28/94	01/27/94	01/26/94	01/23/94	01/22/94
ROW No.	PARAM ID: [1]	ANALYTE NAME TEST METHOD# 624	MDL * UG/L	UG/L	UG/L	UG/L	UG/L	UG/L	UG/L	UG/L	UG/L	UG/L	UG/L	UG/L	UG/L
26		M+P-XYLENE	1	BDL	205	174	147	211	10	241	589	848	776	754	766
27		O-XYLENE	1	BDL	BDL	89	80	110	5	136	335	487	434	427	424
20		trans-1,3-DICHLOROPROPENE	1	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL
36		1,4-DICHLOROBENZENE	1	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL
35		1,3-DICHLOROBENZENE	1	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL
38		NAPHTHALENE	1	BDL	BDL	70	98	171	6	113	298	420	400	368	463
32		1,3,5-TRIMETHYLBENZENE	1	BDL	BDL	BDL	BDL	BDL	1	30	59	81	72	73	82
29		ISOPROPYLBENZENE	1	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL
30		N-PROPYLBENZENE	1	BDL	BDL	52	45	69	3	62	127	174	164	165	178
34		sec-BUTYLBENZENE	1	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL
37		1,2-DICHLOROBENZENE	1	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL
33		1,2,4-TRIMETHYLBENZENE	1	BDL	BDL	95	80	116	5	119	253	347	341	332	317
39		METHYL-TERT-BUTYLETHER	1	3,426	7,955	5,297	5,082	5,427	275	768	8,453	6,929	7,764	6,796	6,788
5		TRICHLOROFLUOROMETHANE	1	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL
40	1 V	ACROLEIN (Screen)	100	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL
41	2 V	ACRILONITRILE (Screen)	100	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL
13	3 V	BENZENE	1	BDL	191	93	93	75	4	73	397	338	313	302	303
28	5 V	BROMOFORM	1	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL
12	6 V	CARBON TETRACHLORIDE	1	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL
24	7 V	CHLOROENZENE	1	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL
23	8 V	CHLORODIBROMOMETHANE	1	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL
4	9 V	CHLOROETHANE	1	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL
42	10 V	2-CHLOROETHYL VINYL ETHER	1	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL
10	11 V	CHLOROFORM	1	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL
17	12 V	DICHLOROBROMOMETHANE	1	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL
9	14 V	1,1-DICHLOROETHANE	1	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL
14	15 V	1,2-DICHLOROETHANE	1	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL
6	16 V	1,1-DICHLOROETHYLENE	1	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL
16	17 V	1,2-DICHLOROPROPANE	1	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL
18	18 V	1,3-DICHLOROPROPYLENE	1	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL
25	19 V	ETHYLBENZENE	1	BDL	BDL	42	BDL	49	2	54	128	222	198	200	201
3	20 V	METHYL BROMIDE (Bromomethane)	1	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL
1	21 V	METHYL CHLORIDE (Chloromethane)	1	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL
7	22 V	METHYLENE CHLORIDE	1	BDL	520	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL
31	23 V	1,1,2,2-TETRACHLOROETHANE	1	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL
22	24 V	TETRACHLOROETHYLENE	1	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL
19	25 V	TOLUENE	1	BDL	442	227	260	239	11	332	1,150	1,464	1,277	1,262	1,327
8	26 V	1,2-TRANS-DICHLOROETHYLENE	1	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL
11	27 V	1,1,1-TRICHLOROETHANE	1	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL
21	28 V	1,1,2-TRICHLOROETHANE	1	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL
15	29 V	TRICHLOROETHYLENE	1	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL
2	31 V	VINYL CHLORIDE	1	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL
VIOLATIONS SHADED			SUM	3,426	9,314	6,138	5,885	6,469	323	1,928	11,788	11,310	11,740	10,696	10,713
SUM OF REGULATED CMPS				0	1,164	362	353	363	17	460	1,675	2,023	1,789	1,765	1,830
TOTAL BTEX (bolded)				0	838	624	580	685	32	837	2,699	3,359	2,999	2,962	3,011
* - The Correct MDL = the MDL times the dilution factor.															

HOWCO ENVIRONMENTAL PROJECT ID: PRETREATMENT VOC's

sample #		9400500	9400437	9400402	9400346	9400330	9400305	9400276	9400242	9400213	9400175	9400275	9400241	9400212	9400176
Site #:		#161	#161	#161	#161	#161	#161	#161	#161	#161	#161	FIELD	FIELD	FIELD	FIELD
Batch#:			33	BATCH# 32	BATCH# 32	BATCH# 32	BATCH# 32	BATCH# 31	BATCH# 31	BATCH# 31	BATCH# 32	BATCH# 31	BATCH# 31	BATCH# 31	BATCH# 31
Run Date:			02/02/94	01/21/94	01/20/94	01/20/94	01/20/94	01/14/94	01/14/94	01/14/94	01/20/94	01/14/94	01/14/94	01/14/94	01/13/94
Dilution Factor:			40	DF:50	DF:50	DF:50	DF:50	DF:50	DF:50	DF:50	DF:50	DF:1	DF:1	DF:1	DF:1
Sample Date:			01/21/94	01/19/94	01/18/94	01/15/94	01/14/94	01/13/94	01/12/94	01/11/94	01/10/94	01/08/94	01/12/94	01/11/94	01/10/94
ROW No.	PARAM ID: [1]	ANALYTE NAME TEST METHOD# 624	MDL * UG/L	UG/L	UG/L	UG/L	UG/L	UG/L	UG/L	UG/L	UG/L	UG/L	UG/L	UG/L	UG/L
26		M+P-XYLENE	1	NA	383	367	603	279	395	251	98	102	554	BDL	BDL
27		O-XYLENE	1	NA	210	201	340	157	219	342	131	139	312	BDL	BDL
20		trans-1,3-DICHLOROPROPENE	1	NA	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL
36		1,4-DICHLOROBENZENE	1	NA	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL
35		1,3-DICHLOROBENZENE	1	NA	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL
38		NAPHTHALENE	1	NA	245	163	206	160	175	251	143	172	166	BDL	BDL
32		1,3,5-TRIMETHYLBENZENE	1	NA	55	BDL	BDL	BDL	153	180	108	109	161	BDL	BDL
29		ISOPROPYLBENZENE	1	NA	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL
30		N-PROPYLBENZENE	1	NA	115	83	100	63	81	95	61	59	85	BDL	BDL
34		sec-BUTYLBENZENE	1	NA	BDL	BDL	BDL	BDL	BDL	BDL	133	143	171	BDL	BDL
37		1,2-DICHLOROBENZENE	1	NA	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL
33		1,2,4-TRIMETHYLBENZENE	1	NA	217	112	143	89	120	144	90	97	123	BDL	BDL
39		METHYL-TERT-BUTYLETHER	1	NA	5,569	2,413	3,501	897	2,595	1,056	954	768	17,172	BDL	BDL
5		TRICHLOROFLUOROMETHANE	1	NA	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL
40	1 V	ACROLEIN (Screen)	100	NA	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	DETECTED **	BDL	BDL
41	2 V	ACRILONITRILE (Screen)	100	NA	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL
13	3 V	BENZENE	1	NA	180	139	283	89	140	231	59	96	487	BDL	BDL
28	5 V	BROMOFORM	1	NA	BDL	BDL	BDL	123	BDL	BDL	79	BDL	BDL	BDL	BDL
12	6 V	CARBON TETRACHLORIDE	1	NA	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL
24	7 V	CHLOROBENZENE	1	NA	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL
23	8 V	CHLORODIBROMOMETHANE	1	NA	BDL	BDL	BDL	60	BDL	BDL	51	BDL	BDL	BDL	BDL
4	9 V	CHLOROETHANE	1	NA	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL
42	10 V	2-CHLOROETHYL VINYL ETHER	1	NA	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL
10	11 V	CHLOROFORM	1	NA	BDL	BDL	BDL	71	BDL	BDL	107	421	BDL	BDL	BDL
17	12 V	DICHLOROBROMOMETHANE	1	NA	BDL	BDL	BDL	101	BDL	BDL	103	78	BDL	BDL	BDL
9	14 V	1,1-DICHLOROETHANE	1	NA	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL
14	15 V	1,2-DICHLOROETHANE	1	NA	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL
6	16 V	1,1-DICHLOROETHYLENE	1	NA	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL
16	17 V	1,2-DICHLOROPROPANE	1	NA	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL
18	18 V	1,3-DICHLOROPROPYLENE	1	NA	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL
25	19 V	ETHYLBENZENE	1	NA	97	98	164	74	103	251	99	103	154	BDL	BDL
3	20 V	METHYL BROMIDE (Bromomethane)	1	NA	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL
1	21 V	METHYL CHLORIDE (Chloromethane)	1	NA	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	3,338	BDL	BDL
7	22 V	METHYLENE CHLORIDE	1	NA	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL
31	23 V	1,1,2,2-TETRACHLOROETHANE	1	NA	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL
22	24 V	TETRACHLOROETHYLENE	1	NA	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL
19	25 V	TOLUENE	1	NA	628	759	1,468	500	685	1,436	337	514	1,520	BDL	BDL
8	26 V	1,2-TRANS-DICHLOROETHYLENE	1	NA	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL
11	27 V	1,1,1-TRICHLOROETHANE	1	NA	BDL	59	94	BDL	BDL	88	BDL	BDL	86	BDL	BDL
21	28 V	1,1,2-TRICHLOROETHANE	1	NA	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL
15	29 V	TRICHLOROETHYLENE	1	NA	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL
2	31 V	VINYL CHLORIDE	1	NA	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL
VIOLATIONS SHADED			SUM	0	7,699	4,394	6,903	2,663	4,666	4,325	2,553	2,801	24,329	0	0
SUM OF REGULATED CMPS			0	906	1,054	2,010	1,019	928	2,006	835	1,211	5,585	0	0	0
TOTAL BTEX (bolded)			0	1,498	1,563	2,858	1,099	1,543	2,511	724	953	3,027	0	0	0

FILE:howco3.WK3

* - The Correct MDL = the MDL times the dilution factor.



Environmental Certification
HRS #E83079

CITY OF ST. PETERSBURG
1635 3RD AVE NORTH
ST. PETERSBURG, FL 33713
ATT:KEVIN RISKOWITZ

ENVIROLAB

1032 U.S. Highway One, North
P.O. Box 468
Ormond Beach, Florida 32175
(904) 672-5668
Fax (904) 673-4001
Drinking Water Certification
HRS #83160

Submission #: 9401000053 Client PO Number: 16385
Date Received: 01/06/94 Project Number:
Date Reported: 01/17/94 Project:

Page 1

Order Number: 44913
Date Sampled: 01/05/94
Client Sample Number: 1
Sample Description: HOWCO-161-#9400105

Method	Component	Units	Result	Analyst	Date Analyzed	Date Prepared
602	1,2-DICHLOROBENZENE	UG/L	<10	RM	01/11/94	
602	1,4-DICHLOROBENZENE	UG/L	<10	RM	01/11/94	
602	CHLOROBENZENE	UG/L	<10	RM	01/11/94	
602	METHYL TERT BUTYL ETHER	UG/L	290	RM	01/11/94	
602	TOTAL XYLENES	UG/L	400	RM	01/11/94	
602	1,3-DICHLOROBENZENE	UG/L	<10	RM	01/11/94	
602	BENZENE	UG/L	210	RM	01/11/94	
602	ETHYLBENZENE	UG/L	480	RM	01/11/94	
602	TOLUENE	UG/L	1200	RM	01/11/94	

Order Number: 44914
Date Sampled: 01/05/94
Client Sample Number: 2
Sample Description: FIELD BLANK-#9400104

Method	Component	Units	Result	Analyst	Date Analyzed	Date Prepared
602	1,2-DICHLOROBENZENE	UG/L	<1.0	RM	01/12/94	
602	1,4-DICHLOROBENZENE	UG/L	<1.0	RM	01/12/94	
602	CHLOROBENZENE	UG/L	<1.0	RM	01/12/94	
602	METHYL TERT BUTYL ETHER	UG/L	<1.0	RM	01/12/94	
602	TOTAL XYLENES	UG/L	<1.0	RM	01/12/94	
602	1,3-DICHLOROBENZENE	UG/L	<1.0	RM	01/12/94	
602	BENZENE	UG/L	<1.0	RM	01/12/94	
602	ETHYLBENZENE	UG/L	<1.0	RM	01/12/94	
602	TOLUENE	UG/L	<1.0	RM	01/12/94	



Environmental Certification
HRS #E83079

CITY OF ST. PETERSBURG
1635 3RD AVE NORTH
ST. PETERSBURG, FL 33713
ATT:KEVIN RISKOWITZ

ENVIROLAB

1032 U.S. Highway One, North
P.O. Box 468
Ormond Beach, Florida 32175
(904) 672-5668
Fax (904) 673-4001
Drinking Water Certification
HRS #83160

Submission #: 9401000068
Date Received: 01/07/94
Date Reported: 01/19/94

Client PO Number: 16385
Project Number:
Project: SWWTP

Page 8

Order Number: 44955
Date Sampled: 01/06/94
Client Sample Number: 3
Sample Description: 794-9400132

Method	Component	Units	Result	Analyst	Date Analyzed	Date Prepared
8250	DI-N-OCTYL PHTHALATE	UG/L	<5	TP	01/16/94	1/13/94
8250	DIMETHYL PHTHALATE	UG/L	<5	TP	01/16/94	1/13/94
8250	FLUORANTHENE	UG/L	<5	TP	01/16/94	1/13/94
8250	HEXACHLOROBUTADIENE	UG/L	<5	TP	01/16/94	1/13/94
8250	HEXACHLOROETHANE	UG/L	<5	TP	01/16/94	1/13/94
8250	ISOPHORONE	UG/L	<5	TP	01/16/94	1/13/94
8250	N-NITROSODIMETHYLAMINE	UG/L	<5	TP	01/16/94	1/13/94
8250	NAPHTHALENE	UG/L	<5	TP	01/16/94	1/13/94
8250	PHENANTHRENE	UG/L	<5	TP	01/16/94	1/13/94
8250	PYRENE	UG/L	<5	TP	01/16/94	1/13/94
8250	1-METHYLNAPHTHALENE	UG/L	<5	TP	01/16/94	1/13/94
8250	2-METHYLNAPHTHALENE	UG/L	<5	TP	01/16/94	1/13/94
8250	DIOXIN (SCREEN)	UG/KG	<100	TP	01/16/94	1/13/94

Order Number: 44956
Date Sampled: 01/06/94
Client Sample Number: 4
Sample Description: 161-9400128

Howe

Method	Component	Units	Result	Analyst	Date Analyzed	Date Prepared
602	1,2-DICHLOROBENZENE	UG/L	<5	RM	01/10/94	
602	1,4-DICHLOROBENZENE	UG/L	<5	RM	01/10/94	
602	CHLOROBENZENE	UG/L	<5	RM	01/10/94	
602	METHYL TERT BUTYL ETHER	UG/L	<5	RM	01/10/94	
602	TOTAL XYLENES	UG/L	860	RM	01/10/94	
602	1,3-DICHLOROBENZENE	UG/L	<5	RM	01/10/94	
602	BENZENE	UG/L	420	RM	01/10/94	
602	ETHYLBENZENE	UG/L	97	RM	01/10/94	
602	TOLUENE	UG/L	1800	RM	01/10/94	



Environmental Certification
HRS #E83079

CITY OF ST. PETERSBURG
1635 3RD AVE NORTH
ST. PETERSBURG, FL 33713
ATT:KEVIN RISKOWITZ

ENVIROLAB

1032 U.S. Highway One, North
P.O. Box 468
Ormond Beach, Florida 32175
(904) 672-5668
Fax (904) 673-4001
Drinking Water Certification
HRS #83160

Submission #: 9401000068
Date Received: 01/07/94
Date Reported: 01/19/94

Client PO Number: 16385
Project Number:
Project: SWWTP

Page 9

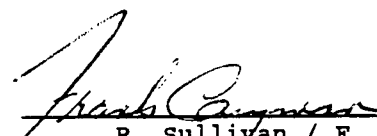
Order Number: 44957
Date Sampled: 01/06/94
Client Sample Number: 5
Sample Description: FIELD BLANK-9400129

Method	Component	Units	Result	Analyst	Date Analyzed	Date Prepared
602	1,2-DICHLOROBENZENE	UG/L	<1.0	RM	01/10/94	
602	1,4-DICHLOROBENZENE	UG/L	<1.0	RM	01/10/94	
602	CHLOROBENZENE	UG/L	<1.0	RM	01/10/94	
602	METHYL TERT BUTYL ETHER	UG/L	<1.0	RM	01/10/94	
602	TOTAL XYLENES	UG/L	<1.0	RM	01/10/94	
602	1,3-DICHLOROBENZENE	UG/L	<1.0	RM	01/10/94	
602	BENZENE	UG/L	<1.0	RM	01/10/94	
602	ETHYLBENZENE	UG/L	<1.0	RM	01/10/94	
602	TOLUENE	UG/L	<1.0	RM	01/10/94	

QC ACCEPTABLE

JAN 19 1994

R.A. ELEFRITZ, SR.


R. Sullivan / F. Guzman
President / Vice-President



Environmental Certification
HRS #E83079

CITY OF ST. PETERSBURG
1635 3RD AVE NORTH
ST. PETERSBURG, FL 33713
ATT:KEVIN RISKOWITZ

ENVIROLAB

1032 U.S. Highway One, North
P.O. Box 468
Ormond Beach, Florida 32175
(904) 672-5668
Fax (904) 673-4001
Drinking Water Certification
HRS #83160

Submission #: 9401000073

Client PO Number: 16385

Date Received: 01/10/94

Project Number:

Date Reported: 01/25/94

Project:

Page 1

Order Number: 44979

Date Sampled: 01/07/94

Client Sample Number: 1

Sample Description: HOWCO-161-#9400153

Method	Component	Units	Result	Analyst	Date Analyzed	Date Prepared
602	1,2-DICHLOROBENZENE	UG/L	<10	RM	01/19/94	
602	1,4-DICHLOROBENZENE	UG/L	<10	RM	01/19/94	
602	CHLOROBENZENE	UG/L	<10	RM	01/19/94	
602	METHYL TERT BUTYL ETHER	UG/L	<10	RM	01/19/94	
602	TOTAL XYLENES	UG/L	2000	RM	01/19/94	
602	1,3-DICHLOROBENZENE	UG/L	<10	RM	01/19/94	
602	BENZENE	UG/L	340	RM	01/19/94	
602	ETHYLBENZENE	UG/L	270	RM	01/19/94	
602	TOLUENE	UG/L	1100	RM	01/19/94	

Order Number: 44980

Date Sampled: 01/07/94

Client Sample Number: 2

Sample Description: FIELD BLANK-#9400154

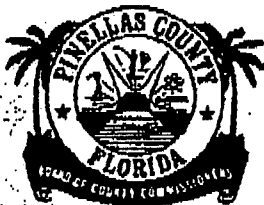
Method	Component	Units	Result	Analyst	Date Analyzed	Date Prepared
602	1,2-DICHLOROBENZENE	UG/L	<1.0	RM	01/19/94	
602	1,4-DICHLOROBENZENE	UG/L	<1.0	RM	01/19/94	
602	CHLOROBENZENE	UG/L	<1.0	RM	01/19/94	
602	METHYL TERT BUTYL ETHER	UG/L	<1.0	RM	01/19/94	
602	TOTAL XYLENES	UG/L	<1.0	RM	01/19/94	
602	1,3-DICHLOROBENZENE	UG/L	<1.0	RM	01/19/94	
602	BENZENE	UG/L	<1.0	RM	01/19/94	
602	ETHYLBENZENE	UG/L	<1.0	RM	01/19/94	
602	TOLUENE	UG/L	<1.0	RM	01/19/94	

Pinellas County Public Health Unit



STATE OF FLORIDA
Department of Health and Rehabilitative Services

DATE: 2-23-94
TOTAL PAGES: 3 (INCLUDING THIS COVER SHEET)
DELIVER TO: RANDY STRAUSS
FAX #: 744-6125
FROM: ERNEST
NOTES: HOWCO EVENT
their response



PINELLAS COUNTY PUBLIC HEALTH UNIT
ENGINEERING - SUITE 300
4175 EAST BAY DRIVE
CLEARWATER, FLORIDA 34624
TEL: (813) 538-7277 FAX: (813) 538-7293 SUNCOM: 558-7277

LAWTON CHILES, GOVERNOR





ENVIRONMENTAL SERVICES INC.

"...conserving limited natural resources through recycling while protecting the environment and public health and welfare."

HRS PINELLAS COUNTY
PUBLIC HEALTH UNIT
FEB 24 1994
ENGINEERING

February 21, 1994

Mr. Earnest M. Roggelin, Environmental Specialist III
Pollutant Storage Tank Program
Pinellas County Public Health Unit
4175 East Bay Drive
Clearwater, FL 34624-6966

Dear Mr. Roggelin:

We are in receipt of your letter dated February 15, 1994 wherein you discussed the controlled overflow/discharge event that took place at our facility recently.

In response to your request for information, the following is provided:

A. The approximate one inch of oil sludge which appears on the bottom of the containment once the liquid has been removed is a product of two factors:

1. The oil that rides up and down on the water that is in the various tanks that are being overflowed has an emulsified layer.
2. The oil that constantly sits in the containment sump is a sufficient quantity even though not in excess of five hundred gallons to generate an emulsified layer of semi-solids once the containment has been pumped out.

It is our contention that at no time was there more than five hundred gallons of petroleum product in the containment area. The sludge as you call it was a product of the emulsification of the oil that was present plus the water and the fact that as we pulled the water out the oil further emulsifies some portion of the water on its way down to the concrete floor.

Please understand that it is our intent that at any time we have a discharge of petroleum products into a containment area which is in excess of five hundred gallons, we will make the necessary reports immediately and infact file a discharge report to your office for review. It is rare but not impossible for this containment to have product in it again. These are most generally due to excessively quick and heavy rainfalls and on very rare occasions, this being one, there can be a mechanical failure which produced excess product in the containment area. As you are aware, we initially had the fire department inspect the premises thoroughly after the report was

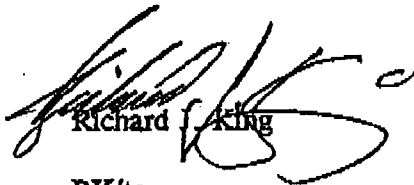
made by the City St. Petersburg Officials. Their inspection revealed that there is a film of oil on the top of the water in the containment area and this film could not have been five hundred gallons of petroleum. Also, immediately upon our discovering the containment had product in it, we initiated a clean-up procedure which began with the removal of the liquids. Upon your arrival, we had just finished removing the liquids and were in the process of cleaning the bottom manually. This cleaning process takes an extensive amount of time and man power and would not be an immediate removal. This therefore is why you found approximately one inch of emulsive semi-solids on the containment floor.

Your concern for the registration for our skid tank in the facility yard is understandable. We are not unwilling to register this tank if the determination by your office is that it does not qualify as a portable or mobile tank by virtue of the Florida Statutes. Please advise if it is your decision that it must be registered. In that event we will provide the necessary submission to Tallahassee for registration.

Your decision to allow our registration of all tanks to be named used oil is appreciated. We felt that this was the only rational way to register our tanks considering that the potential for used oil is always there and rather than have misleading association of name for any possible emergency it would be logical and more protective to maintain the used oil status.

I hope this explanation will satisfactory for the purposes for your inspection and we look forward to your eventual annual visit for compliance inspection later this year.

Sincerely,



Richard J. King

RK/ts



Pinellas County Public Health Unit

HowCO

February 15, 1994

R. J. King
Tim's Oil Recovery, Inc.
843 43rd Street South
St. Petersburg, FL 33711-1922

Re: 528624557
Tim's Oil Recovery, Inc.
843 43rd Street South
St Petersburg
PINELLAS

RECEIVED
FEB 17 1994

Subject: Controlled Overflow/Discharge Event

Department of Environmental Protection
SOUTHWEST DISTRICT
BY _____

Dear Mr. King:

On February 10, 1994 Joseph Sowers and I met with you briefly to investigate a complaint that this agency received from the City of St. Petersburg via the Department of Environmental Protection. The subject event occurred on February 7, 1993. The following items require a response:

a. You indicated to this agency that approximately "5000 gallons of water with 1/4 inch of product" was determined to constitute the "controlled overflow" event. Upon consideration, the containment area when viewed held approximately one inch of waste oil sludge which appears to be denser than water. If so, how will this amount of product factor into the controlled overflow amount discharged? As was discussed, a release of 500 gallons or more must be reported to the Department of Environmental Protection as a discharge.

b. During your overview of the event, you indicated that the eastern containment area contains oil/water separators and processed water tanks. The separators receive a broad spectrum of water/oil from the yard drains, and therefore appear not to be regulated under Florida Administrative Code Chapter 17-762. Please read the accompanying memorandum dated May 30, 1991. If this interpretation holds true, then the PCPHU would be concerned only with the western containment area, and the "skid tank" for compliance activities.

Relative to our discussion on the identification of the facility's tanks as waste/used oil, "L", this agency will continue to accept that determination at this time. While your company collects a broad spectrum of "waste" products including: gasoline, vehicle



PINELLAS COUNTY PUBLIC HEALTH UNIT
ENGINEERING - SUITE 300
4175 EAST BAY DRIVE
CLEARWATER, FLORIDA 34624-6966
TEL: (813) 538-7277 FAX: (813) 538-7293 SUNCOM: 558-7277

LAWTON CHILES, GOVERNOR



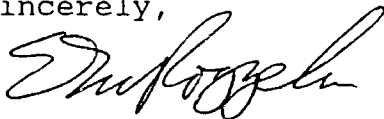
February 15, 1994
Tim's Waste Oil, Inc.

Page 2

diesel, home heating oil, used lube oil, etc. the blending both on the truck and on-site in the large volume tanks probably reduces the non-lube constituents to a de minimus quantity.

Late this year during your routine compliance inspection this agency will need to assemble a flow chart of the western containment area tanks, along with all associated piping. If I may be of further assistance, please contact me at 538-7277 extension 136.

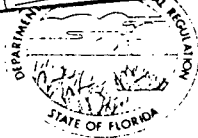
Sincerely,



Ernest M. Roggelin
Environmental Specialist III
Pollutant Storage Tank Program

cc: Randy Strauss, DEP Tampa
John Parnell, City of St. Petersburg

DER Application No. _____
 (Filed in by DER)
 Effective Date: January 17, 1990
 Form Title: Facilities & Transporters
 No. for Registration: _____



Florida Department of Environmental Regulation

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

DER Form 17-710.900(3)
 Annual Report by
 Used Oil Facilities and Transporters
 Form Title: _____
 Effective Date: January 17, 1990
 DER Application No. _____
 (Filed in by DER)

Annual Report by Used Oil Facilities and Transporters

****Please refer to instructions when completing this form****

For reporting period January 1, 1992 through December 31, 1992

SECTION A (To be filled out by Transporters and Collection and Recycling Facility Operators)	
1. Company Name: <u>TIM'S OIL RECOVERY</u> Mailing Address: <u>843 43RD ST. SOUTH</u> <u>ST. PETERSBURG, FL 33711</u> <input type="checkbox"/> Check if changed since last registration	2. Telephone No. <u>(813) 327-8467</u> 3. Used Oil Registration No.: <u>50010</u> -UO
4. Name of person preparing report (please print) <u>CATHY CLEMON</u> Affiliation with business: <u>CONTROLLER</u> Phone No., if different than 2 (____) _____	5. Type of operation (check as many as apply) <input checked="" type="checkbox"/> Collection Facility <input checked="" type="checkbox"/> Transporter <input checked="" type="checkbox"/> Recycling Facility

SECTION B (To be filled out by Collection Facility Operators Only)			
Amount of Used Oil and Oily Waste (gallons) Collected from:	Automotive	Industrial	Mixed
6. Own Operations (Facility and Equipment)			
7. Other Persons (Individuals or Other Companies/Agencies)			
8. Total Amount of Used Oil Collected During Reporting Period (add items 6 and 7)			

SECTION C

(This entire page to be filled out by Transporters and Recycling Facility Operators Only)

Amount of Used Oil and Oily Waste (gallons) Collected From the following sources:	Automotive	Industrial	Mixed
9. CO - Commercial (service stations, garages and shops)			2,732,503
10. AG - Agricultural			81,152
11. IN - Industrial (manufacturing, construction, mining or other industrial processing operations)			705,792
12. MI - Military (all except ships and port facilities)			58,902
13. PC - Public Used Oil Collection Centers			3,010
14. TE - Non-Marine Transportation Terminals (railyards, airports and vehicle fleet terminals)			137,737
15. BP - Bulk Petroleum Storage Terminals (tank bottoms, etc.)			-0-
16. OF - Sources Outside Florida			-0-
17. SH - Ships, Port Facilities, Marinas			36,905
18. OT - Other Sources (specify)			214,919
19. BI - Beginning Inventory			393,233
20. TR or RE - Used Oil Transporter or Recycling Facility			18,345
21. Total Amount of Used Oil and Oily Waste Collected During Reporting Period (add items 9-20)			4,244,761
Amount of Used Oil and Oily Waste (gallons) Marketed, Disposed or End Used:	Automotive	Industrial	Mixed
22. NE - Total amount of used oil or oily waste transferred to other facilities for processing			-0-
23. MBI - Marketed as a Fuel In-State or On-Site Burner			3,496,209
24. MBO - Marketed as a Fuel Out-of-State			-0-
25. MINI - Marketed for an Industrial Process In-State or On-Site Industrial Processor (specify process) _____			-0-
26. MINO - Marketed for an Industrial Process Out-of-State (specify process) _____			-0-
27. DS - Disposal - Underline type of material and specify disposal method and amount Type: Bottom Sediment, Water, Oily Waste, Other Method: <input type="checkbox"/> Landfill <input type="checkbox"/> Wastewater Treatment Unit <input type="checkbox"/> Incinerator <input type="checkbox"/> Other (specify) _____			117,051
28. EI - Total Inventory on Hand (end of year)			631,501
29. Total Amount of Used Oil and Oily Waste from Lines 22-28 (the sum of the three columns of this line should be approximately equal to the sum of the three columns on line 21)			
30. EU - End User (specify end use: burned, phosphate flotation, form oil, chain oil, trap dipping, disposal, other) _____			4,244,761

To the best of my knowledge and belief, I certify the information provided in this report is a true, accurate and complete presentation of the information required by Section 17-710.520, Florida Administrative Code.

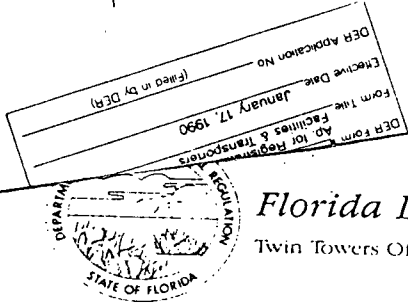
TIM HAGAN, PRESIDENT

Name of Authorized Person (Please print or type)

Tim Hagan
Signature of Authorized Person

06/09/93

Date



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

DEP Form 17-710900(3)
Annual Report by Used Oil Facilities and Transporters
Form Title
Effective Date January 17, 1990
DEP Application No. _____ (Filed in by DEPR)

Annual Report by Used Oil Facilities and Transporters

****Please refer to instructions when completing this form****

For reporting period January 1, 1992 through December 31, 1992

SECTION A (To be filled out by Transporters and Collection and Recycling Facility Operators)	
1. Company Name: <u>HOWCO ENVIRONMENTAL SERVICES</u> Mailing Address: <u>843 43RD ST. SOUTH</u> <u>ST. PETERSBURG, FL 33711</u> <input type="checkbox"/> Check if changed since last registration	2. Telephone No. (813) <u>323-0818</u> 3. Used Oil Registration No.: <u>50119</u> -UO
4. Name of person preparing report (please print) <u>CATHY CLEMON</u> Affiliation with business: <u>CONTROLLER</u> Phone No., if different than 2 () _____	5. Type of operation (check as many as apply) <input checked="" type="checkbox"/> Collection Facility <input checked="" type="checkbox"/> Transporter <input checked="" type="checkbox"/> Recycling Facility

SECTION B (To be filled out by Collection Facility Operators Only)			
Amount of Used Oil and Oily Waste (gallons) Collected from:	Automotive	Industrial	Mixed
6. Own Operations (Facility and Equipment)			
7. Other Persons (Individuals or Other Companies/Agencies)			
8. Total Amount of Used Oil Collected During Reporting Period (add items 6 and 7)			-0-*

***REPORTED UNDER TIM'S OIL RECOVERY 50010-UO**

SECTION C

(This entire page to be filled out by Transporters and Recycling Facility Operators Only)

Amount of Used Oil and Oily Waste (gallons) Collected From the following sources:	Automotive	Industrial	Mixed
9. CO - Commercial (service stations, garages and shops)			
10. AG - Agricultural			
11. IN - Industrial (manufacturing, construction, mining or other industrial processing operations)			
12. MI - Military (all except ships and port facilities)			
13. PC - Public Used Oil Collection Centers			
14. TE - Non-Marine Transportation Terminals (railyards, airports and vehicle fleet terminals)			
15. BP - Bulk Petroleum Storage Terminals (tank bottoms, etc.)			
16. OF - Sources Outside Florida			
17. SH - Ships, Port Facilities, Marinas			
18. OT - Other Sources (specify)			
19. BI - Beginning Inventory			
20. TR or RE - Used Oil Transporter or Recycling Facility			
21. Total Amount of Used Oil and Oily Waste Collected During Reporting Period (add items 9-20)			
Amount of Used Oil and Oily Waste (gallons) Marketed, Disposed or End Used:	Automotive	Industrial	Mixed
22. NE - Total amount of used oil or oily waste transferred to other facilities for processing			
23. MBI - Marketed as a Fuel In-State or On-Site Burner			
24. MBO - Marketed as a Fuel Out-of-State			
25. MINI - Marketed for an Industrial Process In-State or On-Site Industrial Processor (specify process) _____			
26. MINO - Marketed for an Industrial Process Out-of-State (specify process) _____			
27. DS - Disposal - Underline type of material and specify disposal method and amount Type: Bottom Sediment, Water, Oily Waste, Other Method: <input type="checkbox"/> Landfill <input type="checkbox"/> Wastewater Treatment Unit <input type="checkbox"/> Incinerator <input type="checkbox"/> Other (specify) _____			
28. EI - Total Inventory on Hand (end of year)			
29. Total Amount of Used Oil and Oily Waste from Lines 22-28 (the sum of the three columns of this line should be approximately equal to the sum of the three columns on line 21)			
30. EU - End User (specify end use: burned, phosphate flotation, form oil, chain oil, trap dipping, disposal, other) _____			

To the best of my knowledge and belief, I certify the information provided in this report is a true, accurate and complete presentation of the information required by Section 17-710.520, Florida Administrative Code.

Jim Hagan 6-9-93
 Name of Authorized Person (Please print or type)

Jim Hagan 6-9-93
 Signature of Authorized Person Date



Florida Department of Environmental Regulation

Twin Towers Office Bldg. • 2000 Blair-Stone-Road • Tallahassee, Florida 32399-2400

DEP Form 12-710900(3)
Annual Report by
Reporting Use Oil Facilities and Transporters
Reporting Date January 17, 1992
DEP Application No. _____

Annual Report by Used Oil Facilities and Transporters

Please refer to instructions when completing this form

For reporting period January 1, 1992 through December 31, 1992

SECTION A

(To be filled out by Transporters and Collection and Recycling Facility Operators)

1. Company Name: TIM'S OIL RECOVERY

2. Telephone No. (813) 327-8467

Mailing Address: 843 43RD ST. SOUTH

ST. PETERSBURG, FL 33711

3. Used Oil Registration No.:

-UO

☐ Check if changed since last registration

4. Name of person preparing report (please print)

CATHY CLEMON

5. Type of operation (check as many as apply)

☒ Collection Facility

☐ Transporter

☐ Recycling Facility

Affiliation with business: CONTROLLER

Phone No., if different than 2 () _____

SECTION B

(To be filled out by Collection Facility Operators Only)

Amount of Used Oil and Oily Waste (gallons) Collected from:

Automotive

Industrial

Mixed

6. Own Operations (Facility and Equipment)

7. Other Persons (Individuals or Other Companies/Agencies)

8. Total Amount of Used Oil Collected During Reporting Period (add items 6 and 7)

-0-

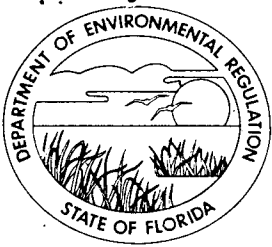
* REPORTED UNDER TIM'S OIL RECOVERY 50010-UO

SECTION C (This entire page to be filled out by Transporters and Recycling Facility Operators Only)			
Amount of Used Oil and Oily Waste (gallons) Collected From the following sources:	Automotive	Industrial	Mixed
9. CO - Commercial (service stations, garages and shops)			-0-
10. AG - Agricultural			
11. IN - Industrial (manufacturing, construction, mining or other industrial processing operations)			
12. MI - Military (all except ships and port facilities)			
13. PC - Public Used Oil Collection Centers			
14. TE - Non-Marine Transportation Terminals (railyards, airports and vehicle fleet terminals)			
15. BP - Bulk Petroleum Storage Terminals (tank bottoms, etc.)			
16. OF - Sources Outside Florida			
17. SH - Ships, Port Facilities, Marinas			
18. CT - Other Sources (specify)			
19. BI - Beginning Inventory			
20. TR or RE - Used Oil Transporter or Recycling Facility			
21. Total Amount of Used Oil and Oily Waste Collected During Reporting Period (add items 9-20)			
Amount of Used Oil and Oily Waste (gallons) Marketed, Disposed or End Used:	Automotive	Industrial	Mixed
22. NE - Total amount of used oil or oily waste transferred to other facilities for processing			
23. MBI - Marketed as a Fuel In-State or On-Site Burner			
24. MSO - Marketed as a Fuel Out-of-State			
25. MINI - Marketed for an Industrial Process In-State or On-Site Industrial Processor (specify process)			
26. MINO - Marketed for an Industrial Process Out-of-State (specify process)			
27. DS - Disposal - Underline type of material and specify disposal method and amount Type: Bottom Sediment, Water, Oily Waste, Other Method: <input type="checkbox"/> Landfill <input type="checkbox"/> Wastewater Treatment Unit <input type="checkbox"/> Incinerator <input type="checkbox"/> Other (specify)			
28. EI - Total inventory on Hand (end of year)			
29. Total Amount of Used Oil and Oily Waste from Lines 22-28 (the sum of the three columns of this line should be approximately equal to the sum of the three columns on line 21)			
30. EU - End User (specify end use: burned, phosphate flotation, form oil, chain oil, trap dipping, disposal, other)			-0-

To the best of my knowledge and belief, I certify the information provided in this report is a true, accurate and complete presentation of the information required by Section 17-710.520, Florida Administrative Code.

Cathy Clemons
Name of Authorized Person (Please print or type)

Cathy Clemons 6/22/93
Signature of Authorized Person Date



Comp

Florida Department of Environmental Regulation

Southwest District

Lawton Chiles, Governor

3804 Coconut Palm

813-744-6100

Tampa, Florida 33619

Virginia B. Wetherell, Secretary

MAY 13 1993

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

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

ATTN.: Tim Hagan, President

WARNING NOTICE #WN93-0030HW52SWD
FLD 152 764 767

RE: Howco Environmental Services
Class I Hazardous Waste Violations

Dear Mr. Hagan,

A hazardous waste compliance inspection was conducted at your facility on February 19, 1993. This inspection was conducted under the authority of Section 403.091, Florida Statutes, and Chapter 403, Part IV, Florida Statutes, in order to determine the compliance status of your facility with Title 40 Code of Federal Regulations Parts 260 through 268, as adopted in Florida Administrative Code Chapter 17-730.

During this inspection, possible violations of rules regarding hazardous waste management were noted. These possible violations are described in the "Summary of Violations" section of the attached inspection report.

You are advised that any activity at your facility that may be contributing to violations of the above described statutes and rules should be ceased immediately. Operation of a facility in violation of state statutes or rules may result in liability for damages and restoration, and the judicial imposition of civil penalties up to \$50,000 per violation per day pursuant to Section 403.727, Florida Statutes.

MAY 13 1993

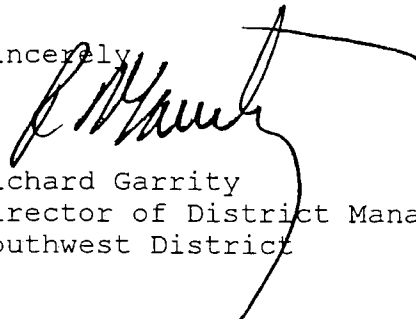
Howco Environment Services
Warning Notice #WN93-0030HW52SWD

You are requested to contact Kevin Bull of this office at (813)-744-6100 (ext. 389) within 10 calendar days of receipt of this Warning Notice to arrange a meeting with Department personnel to discuss the issues raised in this Warning Notice. You may wish to consult an attorney and to have the attorney attend the meeting with the Department.

PLEASE BE ADVISED that this Warning Notice is part of an agency investigation preliminary to agency action in accordance with Section 120.57(4), Florida Statutes. The purpose of this letter is to advise you of potential violations and to set up a meeting to discuss possible resolutions to any potential violations that may have occurred for which you may be responsible. Under the Department's agreement with the United States Environmental Protection Agency (EPA), a formal administrative complaint or "Notice of Violation" (NOV) must be issued within 90 days of the date of the attached inspection report. The issuance of the NOV may be avoided through the entry of a consent order or a demonstration that the listed violations did not occur. If the Department issues a Notice of Violation, and you are named as a party, you will be informed of your rights to contest any determination made by the Department in the Notice of Violation.

If after further investigation, the Department determines that the violation occurred, this matter may be resolved through the entry of a "Consent Order" which will include a compliance schedule and an appropriate penalty.

Sincerely,

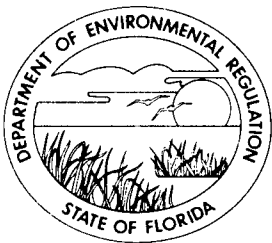


Richard Garrity
Director of District Management
Southwest District

RDG/kmb

Enclosure

cc: Satish Kastury, FDER, BWP&R
Don Trussell, FDER, BWP&R
Alan Farmer, USEPA, Region IV, RCRA Branch
Compliance File



Florida Department of Environmental Regulation

Southwest District

Lawton Chiles, Governor

3804 Coconut Palm Dr.

813-744-6100

Tampa, Florida 33619

Virginia Wetherell, Secretary

HAZARDOUS WASTE INSPECTION REPORT

1. INSPECTION REPORT ___ COMPLAINT X ROUTINE ___ FOLLOW-UP ___ PERMITTING

FACILITY NAME Howco Environmental Services DER/EPA ID # FLD 152 764 767

FACILITY NAME Tim's Oil Recovery DER/EPA ID # FLD 108 304 379

STREET ADDRESS 843 43rd Street South, St. Petersburg, FL 33711

MAILING ADDRESS 843 43rd Street South, St. Petersburg, FL 33711

COUNTY Pinellas PHONE (813) 323-0818 DATE February 19, 1993 TIME 1000 - 1600 hours

TYPE OF FACILITY:

Generator

___ Generator (>1000 kg/month)

___ SQG (100-1000 kg/month)

___ CESQG (<100 kg/month)

Storage

X Container

X Tank

___ Waste Pile

___ Surface Impoundment

Treatment

X Tank

___ Land Treatment

___ Thermal

___ Chem/Phys/Bio

___ Incinerator

___ Surface Impound.

Transporter

X Transporter

___ Transfer Facility

___ Non-Handler

Disposal

___ Landfill

___ Surface Impoundment

___ Waste Pile

X Used oil marketer

2. Applicable Regulations:

___ 40 CFR 261.5

___ 40 CFR 262

X 40 CFR 263

___ 40 CFR 264

X 40 CFR 265

X 40 CFR 266

___ 40 CFR 268

X 17-730 FAC

X 17-710 FAC

3. Responsible Official:

Tim Hagan - Owner

4. Survey Participants and Principal Inspector:

Dick King - Director of Operations

Kevin Bull and Gilbert Dembeck - FDER

5. Facility Latitude:

27° 54' 00"

Longitude:

82° 38' 11"

6. Type of Ownership: FEDERAL STATE COUNTY MUNICIPAL PRIVATE

7. Permit No.: HT52-204220 Date Issued: October 29, 1991 Exp. Date: October 29, 1992

8. Facility Description:

Howco Environmental Services (Howco), operating a facility on approximately three acres, is currently registered as a used oil transporter and recycling facility, under 17-710, Florida Administrative Code (F.A.C.). With regards to hazardous waste, Howco has interim status as a treatment, storage, and disposal facility, under 40 CFR 265. The process used at Howco for recycling of used oil is discussed in previous inspection reports, and so lengthy details will not be supplied in this report.

The following table summarizes the solid wastes of significance that are currently being managed at Howco.

Process	Significant Solid Waste	EPA Haz. Waste No.	Quantity	Disposition	Exclusion/Exemption
Used oil de-emulsification	Recycled oil	N/A	350,000 gal. per mo.	Various	40 CFR 261.6(a)(4)
Oil filter crusher	Crushed oil filters	N/A	1,600 cu. ft. per mo.	Pinellas Cty. incinerator	40 CFR 261.4(b)(15)
Waste water treatment	Waste water	N/A	28,000 gal. per day.	Pinellas Cty. POTW	40 CFR 261.4(a)(2)
Waste water treatment	Sludge	N/A	2,000 gal. per day	Soil Treatment Service	See text
Receipt from off-site	Citrus oil	D001	~18,000 gallons	Pending	-

Mr. Dick King, Director of Operations, escorted the Department investigators throughout the inspection. According to Mr. King, Howco has seven vehicles, each with a capacity of 2,500 gallons, for transporting used oil. Transport vehicles that were used for the transport of used oil, as specified by Mr. King, were found to be lacking the used oil certification number (50119-UO) that has been issued by the Department (see Photo #1). Transport vehicles for Tim's Oil Recovery (see Photo #2), which is also located at the same address as Howco, were also lacking, in some instances, the used oil certification number (50010-UO) that has been issued by the Department. The used oil transport vehicles are otherwise properly placarded.

At the time of the inspection, Howco was storing various wastes in eight transport trailers, according to Mr. King. The trailers vary in size from 4000 to 5500 gallons (see Photo #3). Trailer #33 and #906 *and 2901* contained a material that was described by Mr. King as citrus oil. According to the material data safety sheets (MSDSs) that Mr. King made available, the flashpoint of this material is 118°F (D001). Samples were obtained by Howco operators and analyzed within the Howco laboratory for flashpoint by Mr. Sonny Feagle. The flashpoint (Pensky-Martins Closed Cup) of the material in trailer #33 was found to be 120°F,

whereas that of the material in trailer #906 was found to be 110°F. The Department does not consider a food-based oil as fitting the regulatory definition of used oil, which, according to 57 FR 41613, is derived from "...any oil that has been refined from crude oil, or any synthetic oil..." Accordingly, these materials are defined to exhibit the characteristic of ignitability (D001), as per 40 CFR 261.21. According to Department files, Howco submitted a Part I application under 17-730.230, F.A.C. (Application for a Hazardous Waste Facility Permit), which was received by the Department on October, 29, 1991. Howco was given permit number HT52-204220, however the State permit was terminated on October 29, 1992, as per 17-730.230(8), F.A.C., as the result of the failure of Howco to complete their application. According to Department files, Howco also has submitted a Part A application under 40 CFR 265 (Hazardous Waste Permit), and thus has interim status. This application specifies that only D018 hazardous waste will be handled at Howco. Howco does not have a permit or interim status to treat, store, or dispose of ignitable waste (D001).

According to documents supplied by Mr. King, however, the citrus oil was transported to Howco, by Young Trucking, under a non-hazardous waste manifest. The shipments of citrus oil were generated at two separate facilities (Lakeland and Safety Harbor, FL) of Tastemaker. According to the manifests, a total of approximately 18,000 gallons of this hazardous waste had been received by Howco between January 4, 1993 and January 6, 1993. According to Mr. King, upon receipt the hazardous waste was pumped from the 55-gallon drums, in which it was received, to the storage transport trailers.

By the definition of 40 CFR 260.10, the storage transport trailers are containers, in that they are "...portable device(s)." Upon examination, transport trailer #906 was found to be open. Mr. King was unable to supply a written schedule for inspections of the containers, as well as a written schedule for the operating and emergency equipment found within the facility, although, according to Mr. King site inspections are conducted on a daily basis.

Mr. King was questioned regarding the contents of the other six transport trailers in this area, in addition to their being visually examined for contents. Following is a list of their contents according to Mr. King: #907 - gasoline/water mixture (flashpoint of 118°F, according to Mr. Feagle's analysis), which had been detected, by Howco operators, in the WWTU and consequently pumped to this trailer; #902 - ink/oil mixture; #906 - used oil; #603 - empty; #608 - used oil; and #(unmarked) - used oil.

Used oil received by Howco is pumped directly to the oil tank farm which, according to Mr. King, has a capacity of approximately 300,000 gallons. The process used by Howco to recycle the used oil includes the addition of de-emulsifiers to separate water and settle the solids out of the used oil. The recycled oil is then marketed to various facilities throughout the State of Florida for the purposes of energy recovery. Howco also receives used oil filters, which are crushed, drained, and packed in lined cardboard boxes (4' x 4' x 4') for incineration. According to Mr. King, the used oil filters are incinerated at the Pinellas County solid waste incinerator. As per 40 CFR 261.4(b)(15), oil filters that have been properly drained are excluded from hazardous waste regulations.

According to Mr. King, Howco also receives water that has been contaminated with petroleum products. Laboratory analysis of the chemical oxygen demand (COD) is performed, and depending on the COD, the contaminated water is placed in one of two series of storage tanks. The WWTU uses potassium permanganate (to reduce the COD), and a polymer (to initiate flocculation). The WWTU is permitted by the City of St. Petersburg under permit number SPFL-5093-86-32 to release up to 28,000 gallons per day to the POTW. Each shipment of sludge from the WWTU is analyzed by an independent certified laboratory,

according to Mr. King. The sludge, which is shown to be non-hazardous by the laboratory results, according to Mr. King, is transported largely to Soil Treatment Services of Kissimmee, FL.

On March 30, 1993, a telephone call was placed to Mr. Larry Keene, Operating Manager of Soil Treatment Services (STS) of Kissimmee, FL. According to Mr. Keene, STS is permitted as a soil thermal treatment facility under 17-296 and 17-775, F.A.C. According to 17-296.415, "Soil thermal treatment facilities are only authorized to treat petroleum contaminated soil..." Subsequent to this conversation with STS, STS's soil site data sheet and laboratory results were received via STS for waste shipped from Howco to STS on January 14, 1993. The soil site data sheet did not indicate that the material to be thermally treated at STS was sludge from a WWTU. According to 403.413, F.S., WWTU sludge is litter, and as per 403.413(4)(c), dumping this material on a private property (soil thermal treatment facility) is unlawful unless prior consent of the owner has been given, and unless such litter is not in violation of any other State rule (for example, 17-296.415, F.A.C.). For the two separate incidents documented, Howco disposed of approximately 51 tons of waste on December 11, 1992, and 24 tons of waste on January 14, 1993.

Based on the laboratory results of the material shipped from Howco to STS, analysis of the total volatile organic halogens, apparently performed by Howco's environmental laboratory, indicated that the concentration of tetrachloroethylene was 2.231 mg/kg. As tetrachloroethylene is a TCLP contaminant with a maximum allowable concentration of 0.700 mg/L, the analyses performed for this waste is not sufficient to determine if the waste is hazardous waste. Accordingly, analyses for this waste should have included all TCLP contaminants, ignitability, corrosivity, and reactivity

Upon completion of the site inspection on February 19, 1993, a record review was conducted. Mr. King could not supply a written training plan, nor a closure plan. Also, Howco does not have documentation of compliance with the financial requirements of Subpart H of 40 CFR 265. It should be noted here that Howco has submitted a request to the Department to have their TSD permit withdrawn. As noted earlier, the State T.O.P. has been terminated, however action is pending with regard to the Federal TSD application. A decision is pending whether Howco will be required to close pursuant to 40 CFR 265 Subpart G.

Although Mr. King did make available the contingency plan for Howco, he did note that the plan is currently being amended. According to Department records these amendments have not yet been received. Also, although a groundwater monitoring plan was made available by Mr. King, no groundwater analytical results were available as, according to Mr. King. A Contamination Assessment Plan, under OGC case number 91-1176, is currently awaiting approval by the Department.

9. Summary of Violations:

403.727 (1)(b), F.S. and 40 CFR 270.71 During interim status, a TSD shall not treat, store, or dispose of hazardous waste not specified in Part A of the permit application. Approximately 18,000 gallons of citrus oil (D001) was received by Howco Environmental Services from January 4, 1993, to January 6, 1993. Howco Environmental Services' permit application specifies only D018 and does not include D001 waste.

40 CFR 265.173 A container holding hazardous waste must always be closed during storage, except when it is necessary to add or remove waste. Container #906 at Howco Environmental Services, containing citrus oil (D001), was found to be open when inspected.

40 CFR 265.174 The owner or operator must inspect areas where containers are stored, at least weekly, looking for leaks and for deterioration caused by corrosion or other factors. Howco Environmental Services had no written records indicating that these inspections were performed, although the inspections are conducted daily.

40 CFR 265.15 The owner or operator must develop and follow a written schedule for inspecting all monitoring equipment, safety and emergency equipment, security devices, and operating and structural equipment that are important to preventing, detecting, or responding to environmental or human health hazards. No written schedule was available at Howco Environmental Services, although daily inspections are conducted.

40 CFR 262.11 A person who generates a solid waste must determine if that waste is a hazardous waste. Howco Environmental Services does not adequately determine if the WWTU sludge is hazardous waste. The hazardous waste determination for this waste should include all TCLP contaminants, ignitability, reactivity, and corrosivity.

403.413 (4) (c), F.S. It is unlawful for any person to dump litter in or on any private property, unless prior consent of the owner has been given and unless such litter will not be in violation of any other State regulation. Howco Environmental Services is disposing of solid waste from their WWTU in soil thermal treatment facilities, which according to 17-296.415, F.A.C., are only authorized to treat petroleum contaminated soil as defined in Chapter 17-775, F.A.C. According to documents from the soil thermal treatment facility, there is no knowledge that the waste received from Howco Environmental Services is a sludge from a WWTU.

40 CFR 265.16 Facility personnel must successfully complete a program of classroom instruction or on-the-job training that teaches them to perform their duties in a way that ensures the facility's compliance with the requirements of this part. A written training program, with all the appropriate elements, was not available for inspection at Howco Environmental Services.


40 CFR 265 Subpart G The owner or operator of a treatment, storage, or disposal facility shall comply with this subpart. Howco Environmental Services currently does not have a closure plan.

40 CFR 265 Subpart H The owner or operator of a treatment, storage, or disposal facility shall comply with this subpart. Howco Environmental Services currently does not have documents regarding liability coverage for sudden accidental occurrences or financial assurance for closure.

17-710.600(4), F.A.C. Transporters, except for common carriers and those who carry used oil in drums, shall permanently apply the certification number to each transport vehicle. Transport vehicles, certified under Howco Environmental Services and Tim's Oil Recovery, were lacking certification numbers.

Howco Environmental Services
FLD 152 764 767

Report Prepared By:

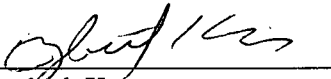


Kevin Bull
Environmental Specialist I

Date:

4-16-93

Approved By:



Elizabeth Knauss
Environmental Supervisor I

Date:

4/23/93



Photo #1 - Howco Environmental Services' used oil transport vehicles



Photo #2 - Tim's Oil Recovery's used oil transport vehicles



Photo #3 - Transport trailers used for storing various wastes

RCRA Checklist for Inspection of Waste Fuel Marketers/Processors:Name of Facility: Howco ENVIRONMENTALAddress: 843 43rd Street SouthSt. Pete FL 33711

EPA Waste Fuel I.D. Number: _____

Facility Inspection Representative: _____

Title: _____

Telephone: _____

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	Treatment	Disposal
<u> </u> Drum	<u>✓</u> Settling	<u> </u> Landfill
<u>✓</u> Above-ground tank(s)	<u>✓</u> Heat addition	<u> </u> Land Treatment
<u> </u> Underground tank(s)	<u>✓</u> In-Line Filtering	<u> </u> Surface Impoundment
<u> </u> Other	<u> </u> Certrifugation	
<u> </u> Tank sizes	<u>✓</u> Screen Filtration	<u> </u> Other
<u> </u>	<u> </u> Dehydration	
<u> </u>	<u>✓</u> Emulsion Breaking	
	<u>✓</u> Blending	

 Descriptions and Observations: _____

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.
(Request manifests for review)

yes ☐ no

___ 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.

Celcius oil

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

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

OEE spec. Ajax only

Date 2-19-93
Inspector Gilbert Dembeck + Kevin Bull
Facility ID# PLD 152 768 767

RCRA COMPLIANCE INSPECTION REPORT
TSD FACILITIES CHECKLIST

General Facility Standards

1. Site Name HOWCO Environmental Services, Inc.
2. Has facility received hazardous waste from a foreign source? (264.12 - required notices) Yes ☒ No
- If yes, has he filed a notice with the Regional Administrator and DER? Yes No NA
3. Does the facility have a copy of the permit along with the approved application? ☒ Yes No

Part A only

Waste Analysis (264.13) 264___ Permit Condition___

1. Is a copy of the waste analysis plan maintained at the facility? ☒ Yes No
2. Does the facility have copies of completed waste analysis reports? ☒ Yes No
3. Has the waste analysis been reviewed or repeated as required? ☒ Yes No
4. (For off-site facilities) waste analysis that generators have agreed to supply? ☒ Yes No
5. Check waste analysis equipment to see if it is on-site and in working condition? ☒ Yes No

Security (264.14) 264___ Permit Condition___

1. Is the facility security system adequate to minimize unauthorized entry? ☒ Yes No
2. Are signs posted and legible for 25 feet? ☒ Yes No

Inspection Requirement (264.15) 264___ Permit Condition___

1. Does the facility have a copy of the Inspection Plan? Yes ☒ No

2. Does the facility have completed inspection logs? ☐ Yes ☒ No
3. Were the deficiencies corrected in a timely manner? ☒ Yes ☐ No
4. Are the inspection logs maintained at the facility for 3 years? ☐ Yes ☒ No
5. Is the facility equipped to prevent fire, explosion or contamination of the environment and is the equipment in working condition? ☒ Yes ☐ No

Personnel Training (264.16) 264__ Permit Condition__

1. Does facility have copy of training plan? ☐ Yes ☒ No
2. Does facility have personnel training records? ☒ Yes ☐ No
3. Has management completed training? ☒ Yes ☐ No
4. Have laborers completed training? ☐ Yes ☐ No *UNK*
5. Is training successfully completed within 6 months of hiring/transfer to HW position? ☐ Yes ☐ No *UNK*
6. Has the training been conducted as stated in the Training Plan? ☐ Yes ☐ No *UNK*
7. Do the facility personnel training records include:
- a. Job title and description of position? ☒ Yes ☐ No
- b. Description of employee's training? ☒ Yes ☐ No
8. Are records maintained for 3 years? ☒ Yes ☐ No

Ignitable, Reactive, or Incompatible Waste (264.17) 264__ Permit Condition__

1. Is the waste separated and confined from sources of ignition or reaction, sparks, spontaneous ignition, and radiant heat? ☒ Yes ☐ No
2. Are "No Smoking" signs posted in the area? ☒ Yes ☐ No

Preparedness and Prevention (264.30-.37) 264___ Permit Condition___

1. Is there evidence of fire, explosion or contamination of the environment? ✓Yes ___No
Presently doing CAP
2. Is the facility equipment located in accordance with the approved plan and is it functional? ✓Yes ___No

Contingency Plan and Emergency Procedures (264.50-56) 264___ Permit Condition___

1. Does the facility have a copy of the Contingency Plan? ✓Yes ___No
2. Has the plan been amended and have the amendments been approved? ___Yes ✓No *Plan under amendments*
3. Were the plan revisions submitted to all authorities? ___Yes ✓No
4. Is the emergency coordinator on-site or within short driving distance of plant at all times? ✓Yes ___No
5. Verify equipment location. Is it in working condition? ✓Yes ___No

Manifest System, Recordkeeping and Report (264.70-77) 264___ Permit Condition___

1. Does the facility have copies of the Manifest? ✓Yes ___No
- a. Are the manifests signed and dated and returned to the generator? ✓Yes ___No
- b. Is a signed copy given to the transporter? ✓Yes ___No
- c. Are there any manifests that have not been completely filled out? ___Yes ✓No
2. Are copies of the manifest retained for three years? ✓Yes ___No
3. Has the facility received any shipments of hazardous waste which were inconsistent with the manifest? ✓Yes ___No

HW shipped on non-HW manifest.

DATE 2-19-93
FACILITY ID FLD 152 764 767

a. If yes, has he attempted to reconcile the discrepancy with the generator and transporter?

☐ Yes ☒ No

b. If no, has DER been notified?

☐ Yes ☒ No

4. Does the facility have operating records that show a description and quantity of each hazardous waste and the date and method of T,S,D at the facility?

☒ Yes ☐ No

5. Does location and quantity of hazardous waste agree with operating record?

☐ Yes ☐ No *NA*

Groundwater Monitoring (264.90-.100) 264___ Permit Condition___

1. Does the facility have a copy of the Groundwater Plan?

☒ Yes ☐ No

2. Does the facility have copies of the groundwater analysis?

☐ Yes ☒ No

3. Has the analysis been conducted as specified?

☐ Yes ☒ No

4. Has there been a statistically significant increase of the value for the parameter from background?

☐ Yes ☐ No *UNK*

5. Did the facility notify the Department of the parameter that showed a statistically significant increase within 7 days?

☐ Yes ☐ No *NA*

6. Verify location of wells?

☒ Yes ☐ No

7. Verify condition of wells and check for caps and locks?

☒ Yes ☐ No

Closure and Post-Closure (264.110-.120) 264___ Permit Condition___

1. Is a copy of the approved plan and all revisions kept at the facility?

☐ Yes ☒ No

2. Does the maximum inventory of wastes at the facility exceed that specified in the Closure Plan?

☐ Yes ☐ No *NA*

3. Does the facility have an approved post-closure plan (for land disposal facilities)?

☐ Yes ☐ No *NA*

DATE 2-19-93
FACILITY ID FLD 152 764 767

4. Has the plan been amended and approved by the Department and distributed to the appropriate agencies?

Yes No NA

Financial (264.140-.151) 264 Permit Condition

1. Does the facility have a written estimate, in current dollars, of the cost of closing the facility?

Yes No ✓

2. Has the financial assurance been updated for the last year?

Yes No ✓

3. Is the facility in compliance with the financial assurance regulation with respect to:

Closure cost?

Yes No ✓

Post-closure cost?

N/A Yes No ✓

Sudden liability?

Yes No ✓

Non-sudden liability?

N/A Yes No ✓

HAZARDOUS WASTE INSPECTION
EXIT INTERVIEW

FACILITY: Howco Environmental Services + Tims O.I. Recovery
I.D. NUMBER: FLD 152-764 767 FLD 108 304 379 DATE: 2/19/93 TIME: 3³⁰ PM
INTERVIEW PARTICIPANTS: Dick King, Sonny Feagle

This exit interview is the Department's procedure to advise you early in the process of possible violations of Florida Administrative Code Chapter 17-730, which adopts Federal Regulations 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 (263 Subpart B or 264/265 Subpart E).
- ☐ 4. Personnel Training [265.16 (262.34(d) for SQG) or 264.16].
- ☐ 5. Contingency Plan [265 Subpart D (262.34(d) for SQG) or 264 Subpart D)
- ☐ 6. Preparedness and prevention (265 Subpart C or 264 Subpart C).
- ☒ 7. Container Requirements (265.34 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 (403.722 F.S., F.A.C. 17-730, 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 compliance with TSD requirements for 3, 4, 5, 8

COMMENTS: Receipt of un-manifested HW. Storage of HW in open trailer, unlabeled.
Failure to have VO # on all transport vehicles
Record Keeping under VO number deficient

DER 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

204431

RECEIPT FOR APPLICATION FEES AND MISCELLANEOUS REVENUE

Received from Hewco Environmental Svc. Date 12-28-92

Address 843-43rd St. S., St. Pete Dollars \$ 833.33

Applicant Name & Address Same

Source of Revenue Pollution Recovery Fund

Revenue Code 12001 Application Number 91-1176

By Litty Bladen 1/15/93

HW
11787678

STATE OF FLORIDA
DEPARTMENT OF ENVIRONMENTAL REGULATION

204431

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By Litty Bladen 1/15/93

HW
11787678

Department of Environmental Regulation
Routing and Transmittal Slip

To: (Name, Office, Location)

1. Beth Knauss / Tampa

2. D.E.R.

3. Sel

JUL 14 1992

4.

Remarks:

SOUTHWEST DISTRICT TAMPA

Beth - I've been holding Tim's Oil / Howco in a pending file for several months now. I never received a letter deleting the transfer facility. I'd like to issue approvals (their insurance is fine). Please let me know what you want me to do. If you want the TF deleted, I can do that based on a memo from you (if you don't want to wait for

From a letter from them).

Shanker. Jim

Date

08 July 92

Phone

Terri Chasteen SC 278.0300

CERTIFICATE OF INSURANCE

CSR 06/30/92

PRODUCER
Alexander & Alexander, Inc.

100 S. Ashley Drive, Ste. 1100
Tampa, FL 33602
PHONE 813-229-0027

INSURED

HAGAN HOLDING CO., INC.
843 43RD STREET SOUTH
ST. PETERSBURG FL 33711

THIS CERTIFICATE IS ISSUED AS A MATTER OF INFORMATION ONLY AND CONFERS NO RIGHTS UPON THE CERTIFICATE HOLDER. THIS CERTIFICATE DOES NOT AMEND, EXTEND OR ALTER THE COVERAGE AFFORDED BY THE POLICIES BELOW-

COMPANIES AFFORDING COVERAGE

COMPANY LETTER A NATIONAL UNION FIRE
COMPANY LETTER B FCCI FUND
COMPANY LETTER C
COMPANY LETTER D
COMPANY LETTER E

> COVERAGES <=====

THIS IS TO CERTIFY THAT POLICIES OF INSURANCE LISTED BELOW HAVE BEEN ISSUED TO THE INSURED NAMED ABOVE FOR THE POLICY PERIOD INDICATED. NOTWITHSTANDING ANY REQUIREMENT, TERM OR CONDITION OF ANY CONTRACT OR OTHER DOCUMENT WITH RESPECT TO WHICH THIS CERTIFICATE MAY BE ISSUED OR MAY PERTAIN, THE INSURANCE AFFORDED BY THE POLICIES DESCRIBED HEREIN IS SUBJECT TO ALL TERMS, EXCLUSIONS, AND CONDITIONS OF SUCH POLICIES. LIMITS SHOWN MAY HAVE BEEN REDUCED BY PAID CLAIMS.

CO LTR	TYPE OF INSURANCE	POLICY NUMBER	POLICY EFF DATE	POLICY EXP DATE	LIMITS
	GENERAL LIABILITY				GENERAL AGGREGATE 2,000,000
A	<input checked="" type="checkbox"/> COMMERCIAL GEN LIABILITY [] CLAIMS MADE [X] OCC. [] OWNERS'S & CONTRACTOR'S PROTECTIVE [] []	GL5417279	07/02/92	07/02/93	PROD-COMP/OP AGG. 1,000,000 PERS. & ADV. INJURY 1,000,000 EACH OCCURRENCE 1,000,000 FIRE DAMAGE (ANY ONE FIRE) 50,000 MED. EXPENSE (ANY ONE PERSON) 5,000
	AUTOMOBILE LIAB				COMB. SINGLE LIMIT 1,000,000
A	<input checked="" type="checkbox"/> ANY AUTO <input checked="" type="checkbox"/> ALL OWNED AUTOS [] SCHEDULED AUTOS <input checked="" type="checkbox"/> HIRED AUTOS <input checked="" type="checkbox"/> NON-OWNED AUTOS [] GARAGE LIABILITY <input checked="" type="checkbox"/> PHY.DAM-SCHD VEH	CA5417280	07/02/92	07/02/93	BODILY INJURY (PER PERSON) BODILY INJURY (PER ACCIDENT) PROPERTY DAMAGE EACH OCCURRENCE AGGREGATE
	EXCESS LIABILITY [] UMBRELLA FORM [] OTHER THAN UMBRELLA FORM				
B	WORKERS' COMP AND EMPLOYERS' LIAB	12495-001	01/01/92	01/01/93	STATUTORY LIMITS EACH ACCIDENT 500,000 DISEASE-POL. LIMIT 500,000 DISEASE-EACH EMP. 500,000
A	OTHER PROPERTY - SPECIAL FORM	ST2602674	07/02/92	07/02/93	BLANKET- \$582,000 DEDUCT.- \$5,000.

DESCRIPTION OF OPERATIONS/LOCATIONS/VEHICLES/SPECIAL ITEMS

OTHER NAMED INSUREDS: TIM'S OIL RECOVERY, LTD., HOWCO ENVIRONMENTAL SERVICES, LTD., & TIMCO REALTY CO.

> CERTIFICATE HOLDER <=====

FLORIDA DEPARTMENT OF ENVIRON.
REGUL. HAZARDOUS WASTE SECTION
2600 BLAIR STONE ROAD
TALLAHASSEE FL 32399-2400

ACORD 25-S (7/90)

CANCELLATION <=====

= SHOULD ANY OF THE ABOVE DESCRIBED POLICIES BE CANCELLED BEFORE THE EXPIRATION DATE THEREOF, THE ISSUING COMPANY WILL ENDEAVOR TO MAIL 10 DAYS WRITTEN NOTICE TO THE CERTIFICATE HOLDER NAMED TO THE LEFT, BUT = FAILURE TO MAIL SUCH NOTICE SHALL IMPOSE NO OBLIGATION OR LIABILITY OF ANY KIND UPON THE COMPANY, ITS AGENTS OR REPRESENTATIVES.

= AUTHORIZED REPRESENTATIVE.
=

[Signature]



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

Bob Martinez, Governor

Dale Twachtmann, Secretary

John Shearer, Assistant Secretary

REQUEST FOR STATUS CHANGE
FOR HAZARDOUS WASTE GENERATORS
TRANSPORTERS, OR FACILITIES

This form may be used by hazardous waste generators, transporters, or treatment, storage, or disposal facilities in Florida to request a change in their status. The request is subject to verification by the Department. The generator or facility must comply with the applicable state and federal hazardous waste regulations until the status change is approved by the Department.

BUSINESS EPA/DER ID NUMBER F L D 15 2 7 6 4 7 6 7

BUSINESS NAME HOWCO ENVIRONMENTAL SERVICES, LTD.

MAILING ADDRESS 843 43rd Street South
St. Petersburg, FL 33711

BUSINESS LOCATION same

CONTACT PERSON Tim Hagan, Owner

PHONE NUMBER (813) 323-0818

CURRENT STATUS **

PLEASE CHECK THE APPROPRIATE LINES AND PROVIDE THE REQUESTED INFORMATION.

REQUEST FOR NEW STATUS AS: *N/A

☐ Generator

☐ Transporter

☐ Small Quantity Generator

☐ Transfer Facility

☐ Conditionally Exempt

☐ Treater

☐ Small Quantity Generator

☐ Storer

☐ Non-Handler

☐ Disposer

☐ Out of Business
(Date: _____)

☐ Moved*
(Date: _____)

* If business has moved, please submit EPA Form 8700-12 (Notification of Hazardous Waste Activity) for the new business location if the new location will be involved in hazardous waste management activities.

** Delete Transfer Facility Status retroactive to June, 1989.
(See letter from Carlton. Fields to DER dated November 14, 1990)

HOWCO
HW COMP

D.E.R.

MAR 10 1992

SOUTHWEST DISTRICT
JEP/PA

GENERATORS

This status change is being requested because (check where applicable):

1. ☐ Business no longer generates hazardous waste due to:

☐ change in operation

☐ waste being delisted

☐ business closing

☐ other

2. ☐ Waste generated meets an exclusion in 40 CFR 261.4.

Explain _____

2b. ☐ Wastes generated in farming operations in accordance with
40 CFR 262.51.

3. ☐ Generate less than 100 kg/month of hazardous waste and do not accumulate more than 1000 kg at any time (Conditionally Exempt Small Quantity Generator - 40 CFR 261.5(g)).

4. ☐ Generate between 100 and 1000 kilograms of hazardous waste (or 1 kg or less of acutely hazardous waste) per month and do not accumulate more than 6000 kg at any time (Small Quantity Generator - 40 CFR 261.5(f) and 261.5(g)).

TRANSPORTERS

5. ☐ Business no longer transports hazardous waste.

TREATMENT, STORAGE, DISPOSAL FACILITIES

6. Is the facility now in operation? ☐ YES
☐ NO
☐ Partially closed
☐ Never operated
☐ Under construction

If no, did facility close prior to November 19, 1980? ☐ YES
☐ NO

If no, did facility close prior to July 9, 1982? ☐ YES
☐ NO

If no, was certification of completion of closure submitted prior to January, 1983? ☐ YES
☐ NO

If partially closed, describe operations at the facility that have closed and give dates of closure. _____

7. _____ Waste no longer treated on-site since _____
DATE

8. _____ Waste no longer stored on-site for more than 90 days since _____
DATE

9. _____ Waste no longer disposed of on-site since _____
DATE

10. _____ The only waste treated, stored, or disposed of is that regulated in 40 CFR 261.5 (small quantity generators). State solid waste or industrial permit numbers:

11. _____ The only waste disposed of on-site is that regulated in 40 CFR 262.51 (pesticides used by farmers)

12. _____ Facility is a totally enclosed treatment facility as defined in 40 CFR 260.10.

13. _____ Facility is an elementary neutralization unit or wastewater treatment unit as defined in 40 CFR 260.10.

14. _____ Other _____

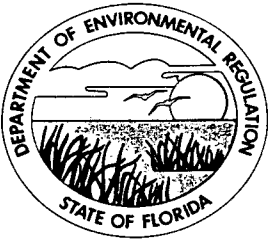
Please attach any documentation or additional explanations and justification to support your request for a status change. You may be asked to submit additional information and your business may be inspected by the Department to verify the information submitted on this form. You may also be required to comply with the applicable closure requirements.

I HEREBY CERTIFY THAT UNDER PENALTY OF LAW I HAVE PERSONALLY EXAMINED AND AM FAMILIAR WITH THE INFORMATION SUBMITTED IN THIS DOCUMENT AND ALL ATTACHMENTS AND THAT, BASED ON MY INQUIRY OF THOSE INDIVIDUALS IMMEDIATELY RESPONSIBLE FOR OBTAINING THE INFORMATION, I BELIEVE THE 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.

<u>Tim Hagan</u>	<u>President</u>
Name (type or print)	Title
<u>Jim Hagan Pres.</u>	<u>3-5-92</u>
Signature	Date

Please mail the completed form to:

Hazardous Waste Management Section
Florida DER
2600 Blair Stone Road
Tallahassee, FL 32399-2400



Florida Department of Environmental Regulation

Southwest District • 4520 Oak Fair Boulevard • Tampa, Florida 33610-7347
Lawton Chiles, Governor 813 623-5561 FAX 813 272-2279 Carol M. Browner, Secretary

April 4, 1991

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

Attn: Ronda Blank

Dear Ms. Blank:

Per your request, the following information is enclosed:

- a copy of the Department's "Contingency Plan Guidance".

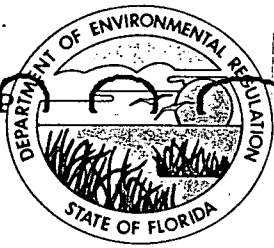
If you have any questions, please call me at (813) 623-5561, extension 373.

Sincerely,

Gilbert T. Dembeck
Environmental Specialist I
Division of Waste Management

GTD/br

Enclosure



Florida Department of Environmental Regulation

Southwest District

4520 Oak Fair Boulevard

Tampa, Florida 33610-7347

Lawton Chiles, Governor

813-623-5561

Carol M. Browner, Secretary

Map Symbols

HOWCO
HOWCO COMP.
Pineles

February 19, 1992

Mr. E. David Hoard
Carlton, Fields, Ward, Emmanuel, Smith & Cutler, P.A.
P.O. Box 3239
Tampa, Florida 33601

re: HOWCO Environmental -- "Dome" Wastes

Dear Mr. Hoard:

I have reviewed your letter of February 14, 1992. I see no need to exchange further correspondence on this issue as the Department does not have jurisdiction over TC wastes disposed of prior to September 10, 1991. However, for future reference, your assumption that D018 wastewaters are automatically "gassy water" (see Paragraph 3 of your letter) is not valid. Gas and gasoline are not synonymous (see paragraph 4). Coal tar is not petroleum and is therefore not an exempt material (see paragraphs 7 and 8). The documents you have submitted in support of your position all indicate that the contamination in the wastewater HOWCO treated was caused by coal tar rather than petroleum. Petroleum (waste oil) is only mentioned in connection with Tank #3. Tank #2 was indicated to be storing coal tar residues. The Department did not object to HOWCO's acceptance of this waste because HOWCO has interim status.

I was interested to read your admission that HOWCO is treating rather than recycling some wastewaters. In the past HOWCO has always claimed to be exempt as a used oil recycler or as a recycler reclaiming fuels for their original intended purpose. You are correct that HOWCO's wastewater treatment unit (WWTU) is exempt from RCRA. However, any hazardous waste HOWCO accepts for treatment instead of recycling is regulated until it enters the WWTU. HOWCO is subject to waste analysis, training, recordkeeping, manifest procedures, security, preparedness and prevention, contingency planning, and financial responsibility requirements if any unrecyclable, non-exempt waste is accepted for treatment or storage.

If HOWCO manages regulated hazardous wastes, HOWCO will be subject to State permitting requirements per 403.722 F.S.

Sincerely,

Elizabeth B. Knauss
Environmental Specialist III

cc. Tim Hagan, Howco
Javier Garcia, USEPA Region IV

HOWCO
- Pinellas
itw compliance

CARLTON, FIELDS, WARD, EMMANUEL, SMITH & CUTLER, P. A.

ATTORNEYS AT LAW

ONE HARBOUR PLACE
P. O. BOX 3239
TAMPA, FLORIDA 33601
(813) 223-7000
FAX (813) 229-4133

FIRSTSTATE TOWER
P. O. BOX 1171
ORLANDO, FLORIDA 32802
(407) 849-0300
FAX (407) 648-9099

HARBOURVIEW BUILDING
P. O. BOX 12426
PENSACOLA, FLORIDA 32582
(904) 434-0142
FAX (904) 434-5366

FIRST FLORIDA BANK BUILDING
P. O. DRAWER 190
TALLAHASSEE, FLORIDA 32302
(904) 224-1585
FAX (904) 222-0398

ONE CLEARLAKE CENTRE
P. O. BOX 150
WEST PALM BEACH, FLORIDA 33402
(407) 659-7070
FAX (407) 659-7368

PLEASE REPLY TO:

Tampa

February 14, 1992

Ms. Elizabeth B. Knauss
Environmental Specialist III
Florida Department of Environmental Regulation
Southwest District
4520 Oak Fair Boulevard
Tampa, Florida 33610-7347

D. E. R.
FEB 18 1992
SOUTHWEST DISTRICT
TAMPA

Re: HOWCO Environmental -- "Dome" Wastes

Dear Beth:

In the recent telephone conversation between you, me and Laurel Lockett, we agreed it would be necessary to sort out both the facts and the law regarding the "Dome" wastes (manifests enclosed) in order to determine whether they were subject to RCRA regulation, and whether they were handled properly by HOWCO. As you can see from the enclosed manifests, these substances were manifested by the City of St. Petersburg as "D018 (<.01%) Hazardous Waste Liquid O.REM. R.Q.T.C. Waste Water M.A.9188". HOWCO's "Generator's Waste Material Profile Sheet" also notes the chemical composition as "H₂O -- 100%, benzene -- <.01%".

If I correctly understand your concern, you feel these substances may have been RCRA hazardous wastes which may not have been treated or disposed of properly by HOWCO. In order to address your concerns, I offer the following:

A letter dated August 6, 1991, from the City of St. Petersburg to Diane Trommer, FDER, (enclosed) stated the substance which was sent to HOWCO was storm water runoff pumped from an excavated underground storage tank (UST) pit at the Suncoast Dome site. Tests of the water sample taken from the tanker truck into which it had been pumped indicated the substance was water slightly contaminated with (D018) benzene (i.e., "gassy water").

Ms. Elizabeth B. Knauss
February 14, 1992
Page 2

In an attempt to determine the exact source of the substance which is the focus of your concern, I have reviewed the "Contamination Assessment Report [CAR] of the Florida Suncoast Dome Construction Site" prepared for the City of St. Petersburg by Environmental Science and Engineering, Inc., in January 1988. Because of the voluminous nature of the CAR, I have not included a copy, but I understand you have a copy in your files. The "Site History" (Section 1.3 of the CAR) indicates no evidence of any activities at the site which would suggest the presence of any USTs containing RCRA regulated hazardous wastes. In fact, the CAR is replete with references to petroleum related activities - particularly relative to a gas plant which operated on the site and several gasoline service stations.

Specifically, the CAR notes that several underground fuel tanks were located in the maintenance yard used to service vehicles. (p. 1-20) Although the CAR states those tanks were "reportedly" removed in the early 1980's and that other petroleum USTs were apparently removed at various times from the 1960's through the 1980's, there is no evidence in the CAR that any USTs, other than those used to store petroleum products or petroleum wastes, were ever at the site. (See, pp. 1-20 through 1-22.)

Please note also that the Closure Assessment Report dated September 19, 1991, (a copy of which I believe is also in your files) prepared by the City of St. Petersburg Engineering Department relative to "UST Removal and Environmental Evaluation" of the "Dome" site also indicates, "The location had previously been used as a municipal gas plant which has been dismantled and removed from the site," and "This site had also been previously registered as a petroleum storage tank facility in 1988 with the known facilities being closed in 9/89". (See page 1 of the Closure Report - enclosed without appendices).

The Closure Report also indicates the soils in one of the removed USTs had "the appearance of coal tar contamination." (Referred to as "Tank Number 2 at page 2 of the Closure Report). It is our understanding that it was the storm water runoff into the excavation pit of this tank ("Number Two") which was sent to HOWCO.

Even though the evidence suggested the storm water runoff pumped from the excavated UST pit was not a RCRA regulated hazardous waste, the City manifested it as such and sought FDER's approval to send it to HOWCO. That approval was granted per Diane Trommer's letter of August 12, 1991 (also enclosed).

Ms. Elizabeth B. Knauss
February 14, 1992
Page 3

It is our understanding that because this "gassy water" was contaminated with such minute amounts of benzene and contained no other reusable or recyclable products, HOWCO did not separate any petroleum product from it to sell for energy recovery (or any other use), but rather, simply processed the "gassy water" through its waste water treatment plant (WWTP), which is exempt from RCRA regulation because it discharges to a NPDES permitted POTW and the WWTP is subject to Clean Water Act pretreatment permit from the City of St. Petersburg. [See, 53 Fed. Reg. 34079, et seq., (September 2, 1988) for an explanation of EPA's position that such waste water treatment units are exempt from RCRA regulation. Specifically, at paragraph II, A.2, "Likewise, the applicability of the exemption does not depend on whether the on-site wastewater treatment facility also treats wastewater generated off-site."] It is also our understanding that in processing this "gassy water", no hazardous wastes were generated.

Even had the substance in question not been processed through the RCRA-exempt waste water treatment facility, it would be exempt from the definition of hazardous wastes pursuant to 40 CFR 261.4(b)(7)(vii) if it were "processed waste water from coal gassification". Although it is not entirely certain as to exactly what the UST may have been used for, there is evidence from the site history in the CAR and UST Closure Report it may have contained such processed waste water.

Also, whether the substance in question here is to be considered as processed waste water from coal gasification or not, it appears unquestionable that it was a petroleum contaminated media ("gassy water") that failed the TCLP test. 40 CFR § 261.4(b)(10) exempts such petroleum contaminated media from the RCRA definition of hazardous waste if it fails the TCLP test and is subject to corrective action regulations under 40 CFR Part 280. Since indications are that the UST in question contained either processed waste water from a coal gassification process or some other petroleum product, such an UST would be subject to 40 CFR Part 280. Again, there is no evidence the UST contained any sort of "hazardous waste listed or identified under subtitle C" of RCRA. [See, 40 CFR 280.10(b)(1), which exempts hazardous waste USTs from Part 280. Note: There is also no evidence to support the idea that the substance in question would fit within the exemption at 40 CFR 261.6(a)(3)(vii) as "coke and coal tar from the iron and steel industry", as I had thought at one time.]

In summary, the issues to be resolved in regard to these "Dome wastes" are:

Ms. Elizabeth B. Knauss
February 14, 1992
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- a. Was the substance in question a RCRA regulated hazardous waste?
- b. If so, was it properly treated, stored or disposed of by HOWCO?

Although it is not absolutely certain that the substance contained in the pulled UST was not a regulated hazardous waste, there is no evidence to suggest that it was. In fact, the great weight of the evidence is that the UST either contained process wastewater from a coal gassification plant [exempt under 40 CFR 261.4(b)(7)(vii)], or some other petroleum product or petroleum waste. Either way, the storm water runoff processed by HOWCO was a petroleum contaminated media that failed the TCLP test and was subject to the corrective action regulations at 40 CFR Part 280 [exempted by 40 CFR 261.4(b)(10)].

In any event, whether or not the stormwater runoff in the excavation pit of the pulled UST is regarded as a RCRA regulated hazardous waste, HOWCO handled it properly by processing it through its RCRA-exempt waste water treatment plant. If you have any questions regarding anything stated herein, please don't hesitate to give me a call.

Sincerely,



E. David Hoard

EDH/smm

Enclosures

cc: Mr. Tim Hagan, HOWCO
Ms. Dianne Trommer, DER, Ground Water Section
Mr. Javier E. Garcia, US EPA Region IV, Residual Management
Branch
Laurel Lockett, Attorney at Law

Please print or type. (Form designed for use on elite (12-pitch) typewriter.)

Form Approved OMB No. 2030-0038 Expires 9-30-91

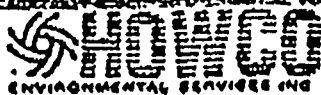
UNIFORM HAZARDOUS WASTE MANIFEST		1. Generator's US EPA ID No. <u>FL 041 201 201 201 201 201</u>		Manifest Document No. <u>10 10 10 10 10 10</u>		2. Page 1 of 1		Information in the shaded areas is not required by Federal law.	
3. Generator's Name and Mailing Address City Of St. Petersburg P.O. Box 2842, St. Petersburg, Florida 33731						A. State Manifest Document Number			
4. Generator's Phone (<u>813</u>) <u>527-1093</u>						B. State Generator's ID			
5. Transporter 1 Company Name Time Oil Recovery						6. USEPA ID Number <u>FL 041 201 201 201 201 201</u>		C. State Transporter's ID	
7. Transporter 2 Company Name						8. USEPA ID Number		D. Transporter's Phone	
9. Designated Facility Name and Site Address Howco Environmental 843 43rd Street South St. Petersburg, FL 33711						10. USEPA ID Number		E. State Transporter's ID	
								F. Transporter's Phone	
								G. State Facility's ID	
								H. Facility's Phone	
11. US DOT Description (including Proper Shipping Name, Hazard Class and ID Number)						12. Containers		13. Total Quantity	
						No. Type		Unit Vol	
a. DO18 (< 117) Hazardous Waste Liquid O.R.M.								14. Waste No.	
b. R.O.T.C. Waste Water M.A. 9188									
c.									
d.									
J. Additional Description of Materials (including Proper Shipping Name, Hazard Class and ID Number) and any other information required by the manifest.									
15. Special Handling Instructions and Additional Information									
16. GENERATOR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national government regulations.									
If I am a large quantity generator, I certify that I have a program in place to reduce the volume and toxicity of waste generated to the degree I have determined to be economically practicable and that I have selected the practicable method of treatment, storage, or disposal currently available to me which minimizes the present and future threat to human health and the environment. Or, if I am a small quantity generator, I have made a good faith effort to minimize my waste generation and select the best waste management method that is available to me and that I can afford.									
Printed/Typed Name <u>X</u>						Signature <u>X</u>		Month Day Year <u>08 08 91</u>	
17. Transporter 1 Acknowledgment of Receipt of Materials									
Printed/Typed Name <u>X</u>						Signature <u>X</u>		Month Day Year <u>08 08 91</u>	
18. Transporter 2 Acknowledgment of Receipt of Materials									
Printed/Typed Name						Signature		Month Day Year	
19. Discrepancy Indication Space									
20. Facility Owner or Operator: Certification of receipt of hazardous materials covered by this manifest except as noted in item 19.									
Printed/Typed Name						Signature		Month Day Year	

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Please print or type. (Form designed for use on elite (12-pitch) typewriter.)

Form Approved. OMB No. 2060-0026. Expires 6-30-97

UNIFORM HAZARDOUS WASTE MANIFEST		1. Generator's US EPA ID No.		Manifest Document No.		2. Page 1 of		Information in the shaded areas is not required by Federal law.	
3. Generator's Name and Mailing Address City of St. Petersburg, P.O. Box 2842, St. Petersburg, Florida 33731		4. Generator's Phone (813) 527-1893		5. Transporter 1 Company Name Time Oil Recovery		6. US EPA ID Number 12 10 1 08 3 04 3 79		A. State Manifest Document Number	
7. Transporter 2 Company Name		8. US EPA ID Number		9. Designated Facility Name and Site Address Howco Environmental 843 43rd Street South St. Petersburg, FL 33711		10. US EPA ID Number 12 10 1 52 7 6 1 7 6 17		B. State Generator's ID	
11. US DOT Description (Including Proper Shipping Name, Hazard Class and ID Number)		12. Containers No.		13. Total Quantity		14. Unit Wt/Vol		15. Waste No.	
a. DO18 (2.1%) Hazardous Waste Liquid O.XXX.		1		1		1		1	
b. R.O.T.C. Waste Water H.A. 9188		1		1		1		1	
c.		1		1		1		1	
d.		1		1		1		1	
J. Additional Descriptions (See Materials Listed Above and 2. Most are generated by the generator and are not for resale or other use. If the generator is not the owner of the materials, the generator must obtain the owner's name and address and provide it to the Office of Hazardous Waste Management, Department of Environmental Protection, 11000 US Highway 1, Suite 2000, Tampa, Florida 33613.									
15. Special Handling Instructions and Additional Information									
16. GENERATOR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national government regulations. If I am a large quantity generator, I certify that I have a program in place to reduce the volume and toxicity of waste generated to the degree I have determined to be economically practicable and that I have selected the practicable method of treatment, storage, or disposal currently available to me which minimizes the present and future threat to human health and the environment; OR, if I am a small quantity generator, I have made a good faith effort to minimize my waste generation and select the best waste management method that is available to me and that I can afford.									
Printed/Typed Name X		Signature X				Month Day Year 08 10 91			
17. Transporter 1 Acknowledgement of Receipt of Materials		Signature X				Month Day Year 08 10 91			
18. Transporter 2 Acknowledgement of Receipt of Materials		Signature				Month Day Year			
19. Discrepancy Indication Space									
20. Facility Owner or Operator: Certification of receipt of hazardous materials covered by this manifest except as noted in Item 19		Signature				Month Day Year			



GENERATOR'S WASTE MATERIAL PROFILE SHEET

WASTE NUMBER 4520-001

A GENERAL INFORMATION

GENERATOR NAME: CONSTRUCTION DYNAMICS, Inc. TRANSPORTER: Hewco
FACILITY ADDRESS: 224-16th St. SE TRANSPORTER PHONE: 771-515
52 PETERSBURG, FL 33701 GENERATOR USEPA ID: FL0000000000
GENERATOR STATE ID: FL000
TECHNICAL CONTACT: GARDNER BAYLES TITLE: ENGINEER PHONE: 873-7828
NAME OF WASTE: WATER
PROCESS GENERATING WASTE: WATER TREATMENT

B PHYSICAL CHARACTERISTICS OF WASTE

COLOR <u>CLEAR</u>	ODOR <input type="checkbox"/> NONE <input checked="" type="checkbox"/> MILD <input type="checkbox"/> STRONG DESCRIBE <u>66337</u>	PHYSICAL STATE @ RT <input type="checkbox"/> SOLID <input type="checkbox"/> SEMISOLID <input checked="" type="checkbox"/> LIQUID <input type="checkbox"/> POWDER	LAYERS <input type="checkbox"/> MULTILAYERED <input type="checkbox"/> BILAYERED <input checked="" type="checkbox"/> SINGLE PHASED	FREE LIQUIDS <input type="checkbox"/> YES <input type="checkbox"/> NO VOLUME <u>100</u> LBS
PK <input type="checkbox"/> 4.8 <input type="checkbox"/> 3.1-4.0 <input type="checkbox"/> N/A <input type="checkbox"/> SPECIFIC GRAVITY <input type="checkbox"/> 1.0-1.1 <input type="checkbox"/> 1.1-1.2 <input type="checkbox"/> 1.2-1.3 <input type="checkbox"/> 1.3-1.4 <input type="checkbox"/> 1.4-1.5 <input type="checkbox"/> 1.5-1.6 <input type="checkbox"/> 1.6-1.7 <input type="checkbox"/> 1.7-1.8 <input type="checkbox"/> 1.8-1.9 <input type="checkbox"/> 1.9-2.0 <input type="checkbox"/> 2.0-2.1 <input type="checkbox"/> 2.1-2.2 <input type="checkbox"/> 2.2-2.3 <input type="checkbox"/> 2.3-2.4 <input type="checkbox"/> 2.4-2.5 <input type="checkbox"/> 2.5-2.6 <input type="checkbox"/> 2.6-2.7 <input type="checkbox"/> 2.7-2.8 <input type="checkbox"/> 2.8-2.9 <input type="checkbox"/> 2.9-3.0 <input type="checkbox"/> 3.0-3.1 <input type="checkbox"/> 3.1-3.2 <input type="checkbox"/> 3.2-3.3 <input type="checkbox"/> 3.3-3.4 <input type="checkbox"/> 3.4-3.5 <input type="checkbox"/> 3.5-3.6 <input 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CITY OF ST. PETERSBURG

August 6, 1991

Mrs. Diane Trommer
Southwest District
Florida Department of Environmental Regulation
4520 Oak Fair Boulevard
Tampa, FL 33610-7347

Re: Florida Suncoast Dome, Abandoned Tank Closure

Dear Mrs. Trommer:

Pursuant to FDER's correspondence dated July 15, 1991 the City initiated sampling and laboratory testing of materials excavated and pumped in conjunction with the referenced work. On August 5, 1991 the City received laboratory results from the sampling of materials and water at the referenced location. Specifically a water sample was taken from the tanker truck to which storm water runoff was pumped from the excavated tank pit, a soil sample was taken of soils excavated from the upper portion of the tank and about the tank during its removal and a sample was taken from the sludge (tank bottoms) which was removed from the tank and placed separately from the referenced soils. Results of these analysis are attached.

Based upon the lab results it is the City's plan to properly disposed of the four separate materials encountered during the project work. Material characteristics and proposed courses of action are itemized below for each material.

Water -Approximately 5000 gallons contaminated with .53 mg/l benzene, characteristically hazardous (via TCLP) with EPA hazardous waste number D018. The water is to be transported and disposed of by licensed hazardous waste transportation and disposal firms (Tims Oil Recovery and Halco Respectively).

Sludge -Approximately five C.Y. contaminated with 1.6 mg/l benzene, characteristically hazardous via TCLP with EPA hazardous waste number D018. The sludge will be properly disposed of through a licensed transportation and disposal firm(s). We are contacting firms in order to evaluate disposal alternatives (hazardous waste land filling vs. incineration), costs and available facilities.

D. Trommer, 8/6/91
Page two of two

Soil -Approximately 40 C.Y. contaminated with coal-tar constituents, non-hazardous via TCLP and as concluded by FDER's approval of the site's CAR and RAP and verified by the attached lab results. These soils will be disposed consistent with the RAP at the Toy Town land fill cell approved and constructed for the treatment of same.

Tank -One 2600 gallon tank which contained sludge will be cleaned in accordance with 40CFR280.71(b) and API publication 2015 referenced in 40CFR280.71(b) and then disposed with manifests to that effect.

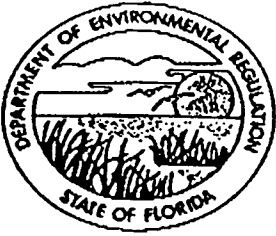
To that end we anticipate proceeding with the outlined work on August 8, 1991 unless instructed otherwise. Please contact me at (813) 893-7828 if you have further concerns or require documentation beyond that referenced above and attached.

Sincerely;


T. Gardner Bayless III, P.E.

Attachment: Pace Lab Report Dated 8/5/91

cc: Clabe Polk, FDER
Laural Lacado, FDER
Bill Hargett, Public Works
Mike Connors, Engineering
Tom Gibson, Engineering



Florida Department of Environmental Regulation

Southwest District

4520 Oak Fair Boulevard

Tampa, Florida 33610-7

Lawton Chiles, Governor

813-623-5561

Carol M. Browner, Secre

August 12, 1991

T. Gardner Bayless III, P.E.
City of St. Petersburg
Post Office Box 2842
St. Petersburg, Florida 33731

Re: Florida Suncoast Dome
Abandoned Tank Closure

Dear Mr. Bayless:

The Department has reviewed your August 6, 1991 correspondence concerning the underground tank at the referenced site and has the following comments:

1. Since the laboratory analysis identifies the contents of the tank as a characteristic hazardous waste for benzene, tank closure activities should comply with the requirements of 40 CFR Part 265, Subpart G.
2. The Department has no objections to the proposed action for the contaminated water.
3. The Department understands through phone conversations with you that the sludge is being moved to DOT containers which will be appropriately labeled and secured.
4. The Department has recently reviewed the requirements of the approved Remedial Action Plan (RAP), the requirements for Permit Number SF52-102675 for the soil remediation project at the Toytown Landfill, and the associated files. Most of the sampling and monitoring that has been done for the project is to be submitted to the Department when the soils treatment is completed. Since the Department does not have this data we have not been able to evaluate how well the soil treatment is working. In addition, several conditions of the closure permit have not been strictly adhered to (submittal of leachate monitoring reports, sampling under an approved Quality Analysis Plan (QAP), submittal of record drawings of soil treatment cell.) Until such time that the Department has an opportunity to evaluate the effectiveness of this soils treatment project, the Department requests that these soils not be taken to the soil treatment cell at the Toytown Landfill.

T. Gardner Bayless III, P.E.
City of St. Petersburg

August 12, 1991
Page Two

I remain available to discuss temporary and/or final disposition of the contaminated soils. If you have any questions, please call me at 813/623-5561, extension 381.

Sincerely,

Diane Trommer

Diane Trommer, P.G.
Professional Geologist II
Division of Waste Management

DT/br

cc: David Thulman, OGC
Richard Garrity, Ph.D.
Kim Ford, P.E., SW
Victor San Agustin, P.E., HW
Michael Link, City of St. Petersburg
Pedro Vargas-Prada, PCHD

CLOSURE ASSESSMENT REPORT

September 17, 1991

**UNDERGROUND STORAGE TANK REMOVAL
AND
ENVIRONMENTAL EVALUATION
(Project No. 90086-110)**

DER Facility ID Number: 528840107

Owner: City of Saint Petersburg

**Location: Florida Suncoast Dome
204 16th Street South
Saint Petersburg, Florida
33701**

**Contact: Michael H. Link
(813) 893-7845**

**Prepared By: City of Saint Petersburg
Engineering Department
P.O. Box 2842
Saint Petersburg, Florida
33731**

**Contact: T. Gardner Bayless, P.E.
(813) 893-7828**

**Contractor: Construction Dynamics, Inc.
Certified Contractor: PCC-046054
2598 28th Avenue North
St. Petersburg, FL 33713**

**Contact: Ed Vehling
(813) 327-8265**

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BACKGROUND

The subject site is currently utilized as a multi-purpose stadium, the Florida Suncoast Dome, and is located in St. Petersburg, Florida near the downtown area. The facility is approximately 66 acres in area and is traversed from North to South by Booker Creek. The location had previously been utilized as a municipal gas plant which has been dismantled and removed from the site. Areas of contamination were discovered during the construction of the existing facility. Following this discovery, an environmental assessment was completed with a report being submitted to and approved by FDER.

The report was submitted to FDER in January 1988 and amended in June 1988. The assessment concluded that areas where tar settling basins and tar/water separators were located (approximately 3 acres) contained visible tar residues, Polynuclear Aromatic Hydrocarbons (PAHs) and Volatile Organic Carbons (VOCs) which were resulting in contamination of the surficial aquifer. A Remedial Action Plan (RAP) was subsequently developed and approved by FDER for the site.

Basically this RAP called for the removal of contaminated soils identified during the contamination assessment and uncovered during the remedial action. The estimated volume of contaminated soil was 20,000 to 25,000 cubic yards. Excavation during the remedial action required the removal of more than 100,000 cubic yards. These soils were taken to a treatment cell at the Toytown Landfill for bioremediation in accordance with the approved RAP.

This site had also been previously registered as a petroleum storage tank facility in 1988 with the known facilities being closed in 9/89.

In March 1991 the City of St. Petersburg entered into contract with S&E Contractors, Inc. to have the Booker Creek retaining walls reconstructed within the referenced site. during this reconstruction two UST were uncovered (see Appendix I for Site Layout). The first tank (STRF #2) was located on the east side of Booker Creek and was discovered on 6/18/91 during excavation for sheet pile templates. A Storage Tank Registration Form (STRF) was filed at the Pinellas County Public Health Unit's (PCPHU's) offices and a site plan for removal was reviewed on 6/21/91 (see Appendix II for STRF).

The tank was vertically installed. Apparently it had been abandoned in place by cutting the top off and filling it with soil. The tank appeared to be approximately 3000 gallons in size and was of steel construction. The contractor, S&E, was

given a notice to proceed on 7/10/91 for having the tank removed by their sub-contractor, Construction Dynamics, Inc. (CDI). The removal was specified to proceed in accordance with Chapter 17-761 Florida Administrative Code (FAC).

A qualified representative of the City and a field technician from Law Engineering was on site during the scheduled removal in order to make visual and/or quantitative determinations as to whether contamination had occurred from the UST.

The second tank (STRF #3, see Appendix III for copy of STRF) was discovered on 8/13/91 during template excavation along the west side of Booker Creek. The steel tank was approximately 300 gallons in capacity and was discovered within a load of soil removed by a track hoe bucket. The subcontractor was instructed to include this tank with their previously approved notice to proceed. Environmental analysis (ground water sampling) was subsequently scheduled through Law Engineering.

TANK REMOVAL AND OBSERVATIONS

Tank Number 2

On July 11, 1991 the contractor (CDI) mobilized to the site and was accompanied by a City representative and a field technician from Law Engineering. PCPHU personnel were also present as work was initiated. CDI began excavation from within and around the tank. Soils were placed on an impermeable liner due to the appearance of coal tar contamination and OVA readings performed by Law confirming the presence of organic vapors (see Appendix IV for summary).

Due to the positive results of the OVA readings and the suspicion that these soils may have been contaminated by coal tar residues, Law was directed to take a sample of the soil for lab analysis in accordance with 17-770.600(8)(c)2. (see Appendix V for lab results). In addition, Discharge Notification Forms were sent via certified mail to both FDER in Tallahassee and PCPHU in Clearwater (see Appendix VI for copies).

As excavation proceeded perforations were noted in the tank. Storm water which was within the excavation began entering the tank due to the elevations of the perforations with respect to water. This occurred late in the day and it was concluded that work would be resumed the following morning after proper containment and/or disposal methods could be developed for the water. Excavated soils were covered with an impermeable liner at the close of construction.

On 7/12/91 CDI mobilized to the site with a tanker truck to contain the water referenced above and a dump truck to transport the contaminated soils to the Toytown treatment cell approved for remediation of coal tar contaminated soils from the Dome site. One truck load of soil (approximately 20 cubic yards) was loaded and hauled to Toytown for treatment. Thunder showers began prior to initiation of water removal or additional soil excavation. This postponed work further and increased the volume of storm water in the excavation. The remaining soils previously excavated were covered to preclude the potential for contaminating storm water.

On 7/15/91 the City received a Fax transmittal from Mr. Clabe Polk of FDER requiring that the contents of the tank be tested for being characteristically hazardous (TCLP) prior to transportation for disposal. TCLP testing was postponed until receipt of 17-700.300(8)(c)2. analytical results.

Analytical results received on 7/19/91 (Appendix V) showed high levels of PAHs as well as VOCs. This was consistent with the previous analytical results obtained during the original contamination assessment (coal tar constituents were present). In accordance with FDER's request, TCLP testing of soils was subsequently arranged.

On 7/22/91 CDI again mobilized for the removal of the UST. Law Engineering personnel were again present in order to provide environmental analysis and sampling as required. Water contained within the excavated pit was pumped to a tanker truck to be disposed of pending the results of TCLP sampling. Next excavation was begun from within the tank. Soil towards the bottom of the tank appeared to have a higher concentration of contamination and were therefore placed on an impermeable liner and covered separately from other soils and have been referenced as "sludge" or "tank bottoms" in related correspondence. An increase in VOCs, via OVA, in the saturated portion of the soils and "sludge" in the tank bottom was used for field confirmation of this increased level of contamination. Approximately 7 cubic yards of sludge were removed.

After the interior of the tank was excavated, excavation was completed around the tank with the soils being placed with the other excavated soils which were less contaminated. The tank was lifted from the pit and transported to the site contractor's, S&E's, secure on-site compound. The tank was placed on and covered with an impermeable liner. Law Engineering placed a temporary monitor well in the pit prior to CDI back filling it. Following the backfilling of the tank pit, a ground water sample was then taken from the well by Law Engineering (see Appendix VII for analytical results). All soils were covered following the close of construction. Testing for hazardous waste was performed per FDER's request as listed below.

TCLP samples were taken of the water (tanker trailer), contaminated soil (upper portion of tank and around tank) and sludge (tank bottom). Pace Laboratory obtained the samples under the direction of Law Engineering personnel, Both of which have approved Quality Assurance Plans (QAPs) on file with FDER.

Results of the TCLP analysis were finalized and received from Law Engineering on 8/5/91 (see Appendix VIII). A proposed course of action letter was prepared and faxed on 8/6/91 to Mrs. Diane Trommer of FDER for comments prior to initiating further action (see Appendix IX).

Mrs. Trommer expressed concerns over the proposal to truck additional non-hazardous soils to the Toytown treatment cell and believed that the UST should be closed in accordance with 40 CFR Part 265, subpart G. Disposal of the water in the tanker trailer (characteristically hazardous with D018, benzene) through a licensed hazardous waste transporter (Tim's Oil Recovery, US EPA ID Number FLD108304379) and disposal firm (Howco Environmental, US EPA ID Number FLD152764767) was acceptable to Mrs. Trommer as well as proposed action to containerize the sludge (also characteristically hazardous with D018, benzene).

On 8/9/91 CDI picked up Waste Wrangler cubic yard containers and placed the sludge in same. The containers were then labeled and placed in S&E's on-site secured compound until disposal arrangements could be made. CDI personnel cleaned the tank and placed residues in the cubic yard containers along with the sludge. The tank was purchased by CDI and then loaded onto their truck and taken to Commercial Metals Company of Tampa, Fl. where it was sold as scrape metal (see Appendix X for copy of bill of sale and scrape metal receipt).

Tim's Oil Recovery picked up the contaminated water in two separate trucks and provided a Hazardous Waste Manifest for each load (see Appendix XI for manifests and invoice).

On 8/15/91 Mrs. Trommer verbally agreed to allow the non-hazardous soils to be transported to and stored at the Toytown treatment cell. Written approval was received on 8/24/91. On 8/16/91 CDI again mobilized to the site with dump trucks to haul these soils to Toytown. Five loads of approximately 20 cubic yards each were transported to Toytown in lined trucks and were placed in the treatment cell on a separate liner as discussed with FDER.

On 8/19/91 S&E advised the City that additional contaminated soil was uncovered immediately south of where the UST was located and that they had left it in place. Mr. Bill Crawford of FDER was contacted, through referral by Mrs. Trommer, via

telephone regarding placement of these additional soils at the Toytown cell. Mr. Crawford did not have a problem with the proposal however he was concerned about confirmatory sampling to be performed at the completion of the RAP for the Dome site. A letter was prepared and submitted to Mr. Crawford confirming this conversation (see Appendix XII).

On 8/21/91, CDI mobilized to the site. It was noted that storm water had entered the area excavated by S&E and a slight sheen was present on the water. Tim's Oil Recovery was contacted and came to the site to pump out the water into their recovery truck for treatment as D018 contaminated water (see Appendix XIII for Manifest and invoice). Additional contaminated soils were then excavated from the south side of the UST's location (see Appendix XIV for location). Eight loads (approximately 20 cubic yards each) were transported in lined dump trucks to the Toytown cell. The contaminated soils were placed on liners adjacent to the soils previously placed at the cell.

On 9/9/91 the containers of hazardous Sludge were picked up for transportation to Quadrex Environmental Company (US EPA ID Number FLD980711071) by A.R. Parquette & Company (US EPA ID Number FLD982105884). The generator first copy is attached in Appendix XV. Ultimate treatment and disposal is proposed at the GSX TSD facility in Pine Wood, SC (US EPA ID Number SCD070375985).

Tank # 3

This tank was a steel above ground storage tank which appeared to have been used for waste oil. The tank had been abandoned below grade and was approximately 300 gallons in capacity. As described in the report's background, City representatives were not on site when this tank was removed. S&E contractors removed the tank incidentally while excavating for placement of sheet pile templates. S&E has provided a written statement regarding observations as the tank was placed on the ground adjacent to the excavation (see Appendix XVI).

The City was informed of the situation the following morning. Although no soil contamination was observed, Testing for ground water contamination was arranged through Law Engineering (results are contained in Appendix XVII). No ground water contamination was apparent as may be noted from the analytical results. The tank was purchased by CDI. CDI cleaned and disposed of the tank as scrape metal at Commercial Metals Company of Tampa, FL (see bill of sale and scrape metal receipt in Appendix XVIII).

ENVIRONMENTAL INVESTIGATIONS

Soils:

OVA readings were taken by Law Engineering during excavation operations at tank number two on both the 11th and 21st of July. These readings were performed in accordance with 17-770.200(2) FAC. Results obtained are contained in Appendix IV. Basically the readings indicated the presence of VOCs at levels which precluded the return of removed soils to the excavation. No OVA readings were taken at tank number three due to the manner in which it was removed as described above.

Soil samples were taken for laboratory analysis at tank number two as discussed above. Results of analysis concluded that the soils excavated from within the upper portion of the tank and around the tank exhibited total concentrations of coal tar constituents at similar values to those found during the assessment of the site in 1987-88.

TCLP testing showed that the constituents within the contaminated soils were not of a leachable nature and therefore were not hazardous. The TCLP test on the sludge did turn out to show benzene as leachable to 1.60 mg/l which classified the material as a characteristically hazardous waste for D018.

No soil analysis were performed at tank number three, the waste oil tank, based on observation made by S&E contractors as referenced above.

Water:

Ground water samples were taken from the locations of both USTs. Results of the sampling at tank number two indicate that contamination is present as was previously documented in the "Addendum To Florida Suncoast Dome Contamination Report". Concentrations of various constituents were found to be generally in the same order of magnitude as previously reported in the approximate location of the UST. Some contaminant levels are significantly less than those originally documented. Below is a list of representative contaminants analyzed for and reported in the referenced CAR and in this report. Please note that Minimum detection levels for some of the constituents have been lowered and therefore it is unknown if these constituents were present during the original CAR.

Compound	units	CAR (6/88) Well #8S,D	Closure Assessment (9/91)
METALS			
Cadmium	mg/l	<.005,<.005	.090
Chromium	"	<.020, .040	.780
Lead	"	<.020, .027	2.600
Arsenic	"	<.005,<.005	.290
VOLATILES			
Benzene	mg/l	4.660, .454	.940
Toluene	"	1.550,<.010	.240
SEMI-VOLATILES			
Acenaphthene	mg/l	.064,<.050	.160
Acenaphthylene	"	.088,<.050	.054
Anthracene	"	<.050,<.050	.074
Benz[a]anthracene	"	<.050,<.050	.052
Benzo[k]fluoranthene	"	<.050,<.050	.023
Benzo[a]pyrene	"	<.050,<.050	.048
Crysene	"	<.050,<.050	.049
Fluoranthene	"	<.050,<.050	.074
Fluorene	"	.073,<.050	.150
Indeno[1,2,3-cd]pyrene	"	<.125,<.125	.031
Naphthalene	"	2.160, .590	2.900
Phenanthrene	"	.110,<.050	.300
Pyrene	"	<.050,<.050	.140
Ethyl-benzene	"	1.130,<.010	.180

Analysis performed on ground water at tank three's location indicated that no contamination of ground water had occurred (see Appendix XVII).

REPORTING

Included in Appendix XIX is a completed closure assessment form as required by chapter 17-761 for the closure of underground storage tanks.

CONCLUSION

Two USTs were closed at the Florida Suncoast Dome. The first tank (# two) appears to have contained coal tar residues as were removed from the site during its original remediation. To the greatest extent possible these additional residues which were found on site have been removed to the approved treatment cell at the Toytown landfill for bioremediation. The portion of materials found to be hazardous were removed for disposal in accordance with RCRA requirements.

The second UST was found to contain a small quantity of waste oil which was drummed and is proposed to be picked-up by Tim's Oil for disposal at Howco. No evidence of contamination was observed at the tank's location and confirmatory ground water testing evidenced that no contamination had occurred.