



# Florida Department of Environmental Protection

Bob Martinez Center  
2600 Blair Stone Road  
Tallahassee, Florida 32399-2400

Rick Scott  
Governor

Jennifer Carroll  
Lt. Governor

Herschel T. Vinyard Jr.  
Secretary

June 02, 2011

**SENT VIA E-MAIL**  
[thagan@howcousa.com](mailto:thagan@howcousa.com)

Mr. Arthur Timothy Hagan, President  
d/b/a Howco Environmental Services  
3701 Central Avenue  
Saint Petersburg, Florida 33713

**SUBJECT:** Howco Environmental Services.  
Used Oil and Material Processing Facility Renewal Permit  
E.P.A. I.D. Number: FLD 152 764 767  
Permit Numbers: 33721-HO-002; 33721-SO-003  
Pinellas County

Dear Mr. Hagan:

Enclosed are Permit Numbers 33721-HO-002 and 33721-SO-003 issued to Howco Environmental Services pursuant to Section 403.815, Florida Statutes (F.S.), and Chapters 62-4, 62-701, 62-710 and 62-740, Florida Administrative Code (F.A.C.).

This permit is final and effective on the date filed with the Clerk of the Department. When the permit is final, any party to the permit has the right to seek judicial review of the permit pursuant to Section 120.68, F.S., by the filing of a Notice to Appeal pursuant to Rule 9.110, Florida Rules of Appellate Procedure, with the Clerk of the Department in the Office of General Counsel, Department of Environmental Protection, 3900 Commonwealth Boulevard, MS #35, Tallahassee, Florida 32399-3000; and by filing a copy of the Notice of Appeal accompanied by applicable filing fees with the appropriate District Court of Appeal.

The notice of Appeal must be filed within thirty (30) days from the date the final permit is issued. If you have any questions, please contact Bheem Kothur at (850) 245-8781 or via e-mail: [bheem.kothur@dep.state.fl.us](mailto:bheem.kothur@dep.state.fl.us).

Sincerely,

*Anthony R. Tripp*  
for Tim Bahr

Tim J. Bahr, Administrator  
Hazardous Waste Regulation

June 02, 2011

Page Two

TJB/at

Enclosure

cc: Jim Dregne, DEP/Southwest District, [james.dregne@dep.state.fl.us](mailto:james.dregne@dep.state.fl.us)  
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## PERMITTEE:

Hagan Holding Company  
d/b/a Howco Environmental Services  
3701 Central Avenue  
Saint Petersburg, Florida 33713

I.D. Number: FLD 152 764 767  
Permit Number: 33721-HO-002  
Permit Number: 33721-SO-003  
Date of Issue: June 2, 2011  
Expiration Date: August 3, 2015  
County: Pinellas County  
Lat/Long: 27°45' 47" N/82° 41' 32" W

Attention:  
Mr. Arthur Timothy Hagan, President

Project: Used Oil and Material Processing Facility

This permit renewal is issued under the provisions of Chapter 403 of Florida Statutes (F.S.), Chapters 62-4, 62-160, 62-701, 62-710, 62-730, 62-740 and 62-762 of Florida Administrative Code (F.A.C.), and 40 Code of Federal Regulations (CFR) Part 279. The above named Permittee is hereby authorized to perform the work or operate the facility shown on the application and approved drawing(s), plans, and other documents attached hereto or on file with the Department and made a part hereto and specifically described as follows:

**TO OPERATE:** To operate a Used Oil Processing Facility hereinafter referred to as "Facility". The Used Oil Processing Facility is located on an approximately five (5) acre parcel of land owned by Timco Real Estate, Inc. in Pinellas County at 843 43<sup>rd</sup> Street South, Saint Petersburg, Florida, 33711. Diagrams of the site layout and tank storage area are included as Attachments (Attachment - A and B, respectively), Tank capacity and its contents are shown in Table (Attachment - B) of this permit.

The facility is authorized to process used oil, oily wastewater, petroleum contact water (PCW), oily solid waste, used antifreeze, and used oil filters under this permit.

The Facility consists of a total of 48 Aboveground Storage Tanks ("ASTs") inside secondary containment. Twenty-five of these tanks may be used to store or process used oil, petroleum contact water, oily wastewater and other non-hazardous wastewater. Presently, nineteen (19) tanks are dedicated to used oil, one (1) tank is dedicated to water/antifreeze, and one (1) tank is dedicated to burner fuel; however, the contents of each tank may change from time-to-time based on market conditions, provided appropriate marking/placarding is provided in accordance with applicable law. The use and the capacities of the ASTs and related appurtenances currently in use at the Facility are listed in Attachment B of this permit.

## OTHER ACTIVITIES

This permit also authorizes the Permittee to operate a waste processing Facility for other petroleum contaminated non-hazardous solid waste not constituting "used oil", subject to the conditions set forth in Part V. The Facility also manages petroleum contact water ("PCW") set forth in Part III.

Hagan Holding Company  
Howco Environmental Services  
Saint Petersburg, Florida

I.D. Number FLD 152 764 767  
Permit Number : 33721-HO-002, 33721-SO-003  
Date of Expiration : August 03, 2015

**The following documents were used in preparation of this permit:**

1. Used Oil Processing Facility Permit Renewal Application Dated July 11, 2005 and additional information submitted dated January 9, 2006 and December 1, 2006.
2. Howco Solid Waste Processing Facility Estimate Document Drafted in September 2006.
3. Used Oil Processing Facility Permit 92465-HO06-001, Issued August 3, 2000.
4. Used Oil Processing Facility Permit Renewal Application Dated May 28, 2010 and received on June 8, 2010.
5. Used Oil Processing Facility Permit Renewal Application NOD-1, Dated July 12, 2010 and the Facility NOD-1 Responses Dated August 11, 2010 and DEP Received on August 17, 2010.
6. Used Oil Processing Facility Permit renewal Application NOD-2, Dated September 21, 2010 and the Facility NOD-2 Responses Dated October 14, 2010 and DEP Received on October 19, 2010.

**This renewal Permit replaces Permit # 33721-HO-001**

Hagan Holding Company  
Howco Environmental Services  
Saint Petersburg, Florida

I.D. Number FLD 152 764 767  
Permit Number : 33721-HO-002, 33721-SO-003  
Date of Expiration : August 03, 2015

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**Part I - GENERAL AND STANDARD CONDITIONS**

1. The terms, conditions, requirements, limitations, and restrictions set forth herein are "Permit Conditions" and as such are binding upon the Permittee and enforceable pursuant to the authority of Sections 403.141, 403.727, or 403.859 through 403.861, Florida Statutes. The Permittee is hereby placed on notice that the Department will review this permit periodically and may initiate enforcement action for any violation of these conditions.
2. This permit is valid only for the specific processes and operations applied for and indicated in the approved drawings or exhibits. Any unauthorized deviation from the approved drawings, exhibits, specifications, or conditions of this permit may constitute grounds for revocation and enforcement action by the Department.
3. As provided in Subsections 403.087(6) and 403.722(5), F.S., the issuance of this permit does not convey any vested rights or any exclusive privileges. Neither does it authorize any injury to public or private property or any invasion of personal rights, nor any infringement of federal, state or local laws or regulations. This permit does not constitute a waiver of or approval of any other Department permit that may be required for other aspects of the total project which are not addressed in the permit.
4. This permit conveys no title to land or water, does not constitute State recognition or acknowledgment of title, and does not constitute authority for the use of submerged lands unless herein provided and the necessary title or leasehold interests have been obtained from the State. Only the Trustees of the Internal Improvement Trust Fund may express State opinion as to title.
5. This permit does not relieve the Permittee from liability for harm or injury to human health or welfare, animal, plant or aquatic life or property and penalties therefore caused by the construction or operation of this permitted source, nor does it allow the Permittee to cause pollution in contravention of Florida Statutes and Department rules, unless specifically authorized by an order from the Department.
6. The Permittee shall at all times properly operate and maintain the facility and systems of processing and control (and related appurtenances) that are installed or used by the Permittee to achieve compliance with the conditions of this permit, as required by Department rules. This provision includes the operation of backup or auxiliary facilities or similar systems when necessary to achieve compliance with the conditions of the permit and when required by Department rules.
7. The Permittee, by accepting this permit, specifically agrees to allow authorized Department personnel, upon presentation of credentials or other documents as may be required by law, access to the premises, at reasonable times, where the permitted activity is located or conducted for the purpose of:
  - (a) Having access to and copying any records that must be kept under the conditions of the permit;
  - (b) Inspecting the facility, equipment, practices, or operations regulated or required under this permit; and

- (c) Sampling or monitoring any substances or parameters at any location reasonably necessary to assure compliance with this permit or Department rules. Reasonable time may depend on the nature of the concern being investigated.
8. If, for any reason, the Permittee does not comply with, or will be unable to comply with, any condition or limitation specified in this permit, the Permittee shall immediately notify and provide the Department with the following information:
- (a) A description of and cause of non-compliance; and
  - (b) The period of non-compliance, including exact dates and times; or, if not corrected, the anticipated time the non-compliance is expected to continue, and steps being taken to reduce, eliminate, and prevent recurrence of the non-compliance.
- The Permittee shall be responsible for any and all damages that may result and may be subject to enforcement action by the Department for penalties or revocation of this permit.
9. In accepting this permit, the Permittee understands and agrees that all records, notes, monitoring data and other information relating to the construction or operation of this permitted source, which are submitted to the Department, may be used by the Department as evidence in any enforcement case involving the permitted source arising under the Florida Statutes or Department rules, except where such use is proscribed by Sections 403.73 and 403.111, F.S. Such evidence shall only be used to the extent it is consistent with the Florida Rules of Civil Procedure and appropriate evidentiary rules.
10. The Permittee agrees to comply with changes in Department rules and Florida Statutes after a reasonable time for compliance, provided however, the Permittee does not waive any other rights granted by Florida Statutes or Department rules.
11. This permit is transferable only upon Department approval in accordance with Rules 62-4.120 and 62-710.800, F.A.C., as applicable. The Permittee shall be liable for any noncompliance of the permitted activity until the transfer is approved by the Department.
12. This permit is required to be kept at the work site of the permitted activity during the entire period of construction, operation, or closure.
13. This permit also constitutes:
- (a) Determination of Best Available Control Technology (BACT);
  - (b) Determination of Prevention of Significant Deterioration (PSD);
  - (c) Certification of Compliance with State Water Quality Standards (Section 401, PL 92-500); and
  - (d) Compliance with New Source Performance Standards.
14. The Permittee shall comply with the following monitoring and record keeping requirements:
- (a) Upon request, the Permittee shall furnish all records and plans required under Department rules. The retention period for all records will be extended automatically, unless otherwise stipulated by the Department, during the course of any unresolved enforcement action;

- (b) The Permittee shall retain at the facility or other location designated by this permit records of all monitoring information (including all calibration and maintenance records), copies of all reports required by this permit, and records of all data used to complete the application for this permit. The time period of retention shall be at least three years from the date of the sample, measurement, report or application unless otherwise specified by Department rule; and
- (c) Records of monitoring information shall include:
  - (1) The date, exact place, and time of sampling or measurements;
  - (2) The person responsible for performing the sampling or measurements;
  - (3) The date(s) analyses were performed;
  - (4) The person responsible for performing the analyses;
  - (5) The analytical techniques or methods used; and
  - (6) The results of such analyses.
- 15. When requested by the Department, the Permittee shall, within a reasonable period of time furnish any information required by law that is needed to determine compliance with the permit. If the Permittee becomes aware that relevant facts were not submitted or were incorrect in the permit application or in any report to the Department, such facts or information shall be submitted or corrected promptly.
- 16. The Permittee shall comply with the following requirements during the life of this permit:
  - (a) The facility shall comply with all applicable portions of 40 CFR Part 279 and Chapter 62-710, F.A.C.
  - (b) This facility shall be constructed, operated and maintained in accordance with all applicable requirements of Chapters 62-4, 62-701, 62-710, 62-730, 62-740, and 62-762, F.A.C., and all other applicable requirements of Department Rules.
  - (c) By acceptance of this permit, the Permittee certifies that he has read and understand the obligations imposed by the General and Standard Conditions contained herein, including the date of permit expiration and renewal deadlines. It is a violation of this permit to fail to comply with all conditions and deadlines.
  - (d) Nothing contained in General and Standard Condition 10 of this permit shall be deemed to waive any right Permittee has under Florida Statutes or Department rules to oppose application of any such changes to the facility if Permittee is otherwise legally entitled to do so.
- 17. Submittals in response to these conditions shall be submitted as follows:
  - (a) One (1) hard copy and one (1) electronic copy shall be submitted to:

Hagan Holding Company  
Howco Environmental Services  
Saint Petersburg, Florida

I.D. Number FLD 152 764 767  
Permit Number : 33721-HO-002, 33721-SO-003  
Date of Expiration : August 03, 2015

Environmental Administrator  
Hazardous Waste Regulation Section  
Bureau of Solid and Hazardous Waste  
Florida Department of Environmental Protection  
2600 Blair Stone Road, MS 4560  
Tallahassee, Florida 32399-2400

- (b) One (1) hard copy and one (1) electronic copy shall be submitted to:

Hazardous Waste Program Manager  
Department of Environmental Protection  
Southwest District Office  
13051 North Telecom Parkway  
Temple Terrace, Florida 33637-0926

- (c) The Permittee shall submit one (1) copy of the renewal permit and/or modifications cover letter and appropriate fee to:

Florida Department of Environmental Protection  
Post Office Box 3070  
Tallahassee, Florida 32315-3070

The Permittee shall submit the other copies of the renewal permit and/or modifications to the addresses in the General and Standard Condition 17 (a) and (b) of this permit.

- (d) Financial Assurance Mechanism:

The Permittee shall maintain, in good standing, the financial mechanisms established to demonstrate proof of financial assurance. Supporting documentation and required adjustments shall be submitted within the time frames specified in Rule 62-701.630, F.A.C. as adopted by reference in Rule 62-710.800(6), F.A.C. All submittals in response to this specific condition shall be sent to:

Florida Department of Environmental Protection  
Financial Coordinator – Solid Waste Section  
2600 Blair Stone Road, MS 4565  
Tallahassee, Florida 32399-2400

- (e) Annual Closing Cost Estimate Adjustment:

The Permittee shall annually adjust the closing cost estimate for inflation using Form 62-710.901(7). Adjustments shall be made in accordance with Rule 62-710.800(6), F.A.C. An owner or operator shall submit the adjusted cost estimate between January 1 and March 1. All submittals in response to this specific condition shall be sent to the addresses on the cost estimate form.

18. The Permittee shall annually register their used oil handling activities with the Department on DEP Form 62-730.900(1)(b) in accordance with Rule 62-710.500, F.A.C.

19. The Permittee shall display the validated registration form and identification number in a prominent place at the facility location [Rule 62-710.500(4), F.A.C].
20. The Permittee shall submit an annual report covering used oil processing facility activities conducted during the previous calendar year to the Department on DEP Form 62-710.901(3) by March 1 of each year in accordance with Rule 62-710.510(5), F.A.C. The report shall summarize the records kept pursuant to Rule 62-710.510, F.A.C. and 62-740.300(5), F.A.C.
21. Before transferring ownership or operation of this facility during its operating life, the Permittee must notify the new owner or operator in writing of the requirements of 40 CFR Part 279 and Rule 62-710, F.A.C. The Permittee shall also submit an application for transfer of the permit, at least thirty (30) days prior to transferring the facility, on DEP Form 62-1.201(1) accompanied with an appropriate application fee, required pursuant to Rule 62-4.050, F.A.C.
22. Before closing or making any substantial modification to the facility, the Permittee shall submit to the Department the Used Oil Processing Facility Permit Modification Request, pursuant to Rules 62-4.080 and 62-710.800(3), F.A.C. The engineering aspects of the request must be certified by a Professional Engineer registered in the State of Florida in accordance with Chapter 471, F.S.
23. The Department may modify, revoke, reissue, or terminate for cause, this permit in accordance with the provisions of Rule 62-710.800, F.A.C. The filing of a request for a permit modification, revocation and reissuance, or termination, or the notification of planned changes or anticipated noncompliance on the part of the Permittee does not stay the applicability or enforceability of any permit condition. The Permittee may submit any subsequent revisions to the Department for approval. These revisions shall meet the requirements of Rules 62-4.050 and 62-710.800(3), F.A.C. and must be accompanied with an appropriate application fee.
24. The Permittee shall submit a complete application for renewal of the permit, on DEP form 62-710.901(6) and in a manner prescribed by the Department, sixty (60) days before the expiration of this permit, unless the facility is to be closed prior to the expiration date of this permit per the requirements of Rule 62-710.800(4), F.A.C.
25. The Permittee shall maintain and operate the facility to minimize the possibility of fire, explosion, or any unplanned sudden or non-sudden release of used oil, sludge, residues or constituents to air, soil, or surface water which could threaten human health or the environment, in accordance with 40 CFR 279.52.
26. The Permittee shall not accept or store any hazardous wastes in the permitted tanks or in any other area at the facility without receiving written approval from the Department.
27. The Permittee is allowed to store used oil only in the aboveground tanks within the secondary containment, and or with double walled tanks as shown in Attachment - A of the permit. The permitted units are as shown in Attachment B of this permit.
28. The Permittee shall not exceed the maximum storage capacities of the permitted tanks as specified in facility operations of the permit application in Attachment II and Attachment B of the permit.



29. Tanks installed on or after July 13, 1998 shall comply with the performance standards of F.A.C., Rule 62-762.501. Repairs to aboveground storage and process tanks shall meet the criteria of Rule 62-762.701, F.A.C. [Rule 62-710.300(3), F.A.C.].
30. The inspection records and release detection monitoring required in Rule 62-762.601, F.A.C. for aboveground process and storage tanks and integral piping shall be maintained in the Permittee operating record. [Rule 62-710.510, F.A.C.].
31. The Permittee shall prevent the release of used oil, oily waste or oily wastewater to the environment. The secondary containment system shall be maintained in accordance with the Attachment No. 6 of the permit application and shall comply with the requirements of 40 CFR 279.54, including the requirements set forth below:
  - (a) All new components shall have secondary containment as required by parts (b) and (c) of this condition prior to being put into service;
  - (b) Pursuant to 40 CFR 279.54, the secondary containment system shall be:
    - (1) Designed, installed and operated to prevent any migration of wastes or accumulated liquid to the soil, groundwater or surface waters;
    - (2) Capable of visual leak detection and collecting releases and run-on until the collected material is removed;
    - (3) Constructed of or lined with materials compatible with the waste to be stored and have sufficient structural strength to sustain the stresses induced by a failure of the primary containment system as well as other stresses which may be induced by the environment;
    - (4) Placed on a foundation or base capable of providing support to the secondary containment system;
    - (5) Provided with a visual leak detection system designed and operated to detect failure of either the primary or secondary containment structures or the presence of any release within one month, but no more than 35 days, by documented visual inspection in accordance with 40 C.F.R. Part 112 and 62-762.601(1)(d)&(e), F.A.C.
    - (6) Sloped or otherwise designed and operated to drain or remove liquids resulting from leaks, spills, or precipitation; and
    - (7) Designed and operated, to contain 110% of the capacity of the largest tank within its boundary.
  - (c) Ancillary equipment shall be provided with secondary containment.
32. The Permittee shall inspect the secondary containment system floor and perimeter walls for any cracks or gaps once a month. If any cracks or gaps are found, the Permittee shall repair the cracks and gaps with caulking the same day of discovery and shall permanently fix the cracks or gaps within seven (7) days [40 CFR 279.54(d)(2) and 40 CFR 279.54(e)(2)].

33. The Permittee shall label or mark all containers and aboveground tanks, used for storage or processing of used oil, with the words "Used Oil" [40 CFR 279.54(f)].
34. The Permittee shall label or mark all containers or tanks which are solely used for the storage of Petroleum Contact Water with the words "Petroleum Contact Water" or "PCW" [Rule 62-740, F.A.C.].
35. The Permittee shall store used oil, PCW, used oil residues or used oil filters only in those containers or tanks which are made of or lined with materials that will not react with and are otherwise compatible with the waste to be stored.
36. If a container or tank holding used oil, PCW, used oil residues or used oil filters is not in good condition (e.g., rusting, bulging) or begins to leak, the Permittee shall transfer the waste to another container or tank which is in good condition [40 CFR 279.22].
37. As part of the general operating requirements, the Permittee shall:
  - (a) Not place used oil, other wastes or treatment reagents in a tank system if the possibility exists that this may cause the tank system to fail;
  - (b) Use appropriate controls and practices to prevent spills and overflows;
  - (c) Follow the operating procedures described in Attachments II and III of the permit application; and
  - (d) Comply with the requirements of 40 CFR 279.54(g) if a leak or spill occurs.
38. The Permittee shall inspect the tank system in accordance with Attachments 7 of the permit application. These requirements include:
  - (a) Developing and following a schedule and procedure for inspecting pump controls, alarms, valves, pipes, tanks, and other applicable overfilling controls.
  - (b) Inspecting at least once each month the aboveground portions of the tank system, and the construction materials and area immediately surrounding the tank storage area. The Permittee shall document the monthly inspections in writing on the monthly inspection form submitted with the permit application; and
  - (c) The results of the inspections in (a) and (b) of this condition shall be maintained in the operating record of the facility.
39. The Permittee shall remove spilled or leaked waste within three (3) days [62-762.821(1)(d), F.A.C.] and accumulated precipitation from the secondary containment areas within one (1) week [62-762.701(2)(b), F.A.C.] and these wastes shall be managed in accordance with the Howco Spill Prevention Control and Countermeasures Plan (SPCC) and Contingency Plan of the permit application.
40. Pursuant to the requirements of 40 CFR 279.52(a), concerning preparedness and prevention, the Permittee shall:

- (a) Maintain a copy of the preparedness and prevention plan, of the permit application, at the facility;
  - (b) Equip the facility with the required emergency equipment described in SPCC Plan of the permit application [40 CFR 279.52(a)(2)];
  - (c) Test and maintain the required emergency equipment in accordance with the requirements of 40 CFR 279.52(a)(3);
  - (d) Provide all facility personnel involved in used oil processing operations with immediate access to an internal alarm or emergency communication device, as described in SPCC Plan of the permit application [40 CFR 279.52(a)(4)]; and
  - (e) Make arrangements with the local authorities as described in SPCC Plan of the permit application [40 CFR 279.52(a)(6)] and Attachment 6 of the permit application dated July 11, 2005 and the revised dated October 12, 2010
41. Pursuant to the requirements of 40 CFR 279.52(b), concerning the contingency plan, the Permittee shall comply with the "Specific Spill Containment Procedures" of Attachment 6 of the permit application dated July 11, 2005 and as revised October 12, 2010. In the event of a Spill or Other Emergency:
- (a) Immediately carry out the provisions of the Attachment 6, Contingency Plan, and SPCC Plan of the permit application, and follow the emergency procedures described by 40 CFR 279.52(b)(6), whenever there is a fire, explosion, or release of used oil, oily waste or oily wastewater that threatens or could threaten human health or the environment. The Permittee shall give proper notification to the Department if an emergency situation arises and within fifteen (15) days must submit to the Department a written report which includes all information required in 40 CFR 279.52(b)(6)(ix);
  - (b) Maintain a copy of the contingency plan at the facility and submit copies to all local police departments, fire departments, hospitals, and State and local emergency response teams pursuant to the requirements of 40 CFR 279.52(b)(3);
  - (c) Amend the plan and submit the amended plan for Department approval within seven (7) days of meeting any criteria listed in 40 CFR 279.52(b)(4). Any other changes to the plan must be submitted to the Department within seven (7) days of the change in the plan. All amended plans must be distributed to the appropriate agencies;
  - (d) Comply with the requirements of 40 CFR 279.52(b)(5), concerning the emergency coordinator; and
  - (e) Notify the Department of Environmental Protection's 24-hour emergency telephone number [(800) 320-0519] in the case of emergency. During normal business hours, the Department's Southwest District office may be contacted at (813) 632-7600.
42. The Permittee shall maintain reports of discharges that are greater than twenty-five (25) gallons, as part of its on-site operating records. The reports shall include amount and time of discharge and a schedule that details the corrective action taken. The Permittee shall submit a written report to the Department within fourteen (14) days for all of the releases that are greater than fifty (50) gallons.

The Permittee shall inform the Department within fourteen (14) days if a release requires the Permittee to take any of the tanks out of service.

43. Within three days of the discovery of a discharge the Permittee shall test the system in accordance with subsection 62-762.641(3), F.A.C., and if found to be leaking, place the system out-of-service in accordance with 62-762.802(2), F.A.C., until repaired, replaced or closed. [62-762.821(2)(d), F.A.C.]
44. *1 month* The Permittee shall inspect the facility operating, emergency and safety equipment in accordance with the schedules approved in Attachment 6 of the permit application. The Permittee shall remedy any deterioration or malfunction discovered by an inspection, in accordance with 40 CFR 279.52. Changes, additions, or deletions to the schedule must be approved in writing by the Department. The schedules must be maintained as part of the operating record of the facility [40 CFR 279.54].
45. Pursuant to 40 CFR 279.55, concerning the written analysis plan, 40 CFR 279.56, concerning Tracking, the Permittee shall:
- (a) Sample and analyze each incoming shipment for the parameters listed in Attachment 3 of the permit application, prior to accepting used oil from off-site facilities. The sampling frequency shall be in accordance with Attachment 3 of the permit application;
  - ? (b) Test all containers of the same waste stream for the parameters listed in Attachment IV of the permit application, if any of the samples fail the analysis required by General and Standard Condition 45.(a), the Permittee may collect a representative sample from containers received from the same generator for this analysis;
  - (c) Reject any incoming containers of used oil which fail the analysis required by the General and Standard Condition 45.(a). The Permittee shall maintain documentation of any shipment of used oil which is refused due to suspected mixing with hazardous waste in the facility operating record; and
  - (d) Analyze, prior to shipment, all outgoing shipments of used oil for the parameters listed in Attachment 3 of the permit application to determine whether the used oil is on-specification or off-specification. However, the testing is not required if it is sent to another Used Oil processor for further processing.
  - (e) Compliance sampling and analysis activities shall be conducted in accordance with Chapter 62-160, F.A.C. Incoming, process control and outgoing used oil analysis will be completed by Howco's laboratory. One biweekly outgoing used oil sample will be sent to an outside laboratory that meets the National Environmental Laboratory Accreditation Conference (NELAC) certification in Chapter 62-160.
  - (f) A copy of the written analysis plan must be kept at the facility.

## PART II – USED OIL PROCESSING CONDITIONS

1. Pursuant to 40 CFR 279.56 (Tracking) and Rule 62-710.510(1), F.A.C., the Permittee must comply with the following tracking requirements: the Permittee shall maintain records on DEP

Form 62-701.900 (2) or on substantially equivalent forms which contain at least the same information as the Department form.

- (a) Acceptance: Used oil processors/re-refiners must keep a record of each used oil shipment accepted for processing/re-refining. These records may take the form of a log, invoice, manifest, bill of lading or other shipping documents. Records for each shipment must include the following information:
    - (1) The name, address and EPA identification number (if applicable) of the transporter who delivered the used oil to the processor/re-refiner, oil-burner or disposal facility;
    - (2) The name, address and EPA identification number (if applicable) of the generator or processor/re-refinery from whom the used oil was received for processing/re-refining;
    - (3) The quantities of each type of used oil accepted and date of acceptance; and
  - (b) Delivery: Used oil processor/re-refiners must keep a record of each shipment of used oil that is shipped to a used oil burner, processor/re-refiner, or disposal facility. These records may take the form of a log, invoice, manifest, bill of lading or other shipping documents. Records for each shipment must include the following information:
    - (1) The name, address and EPA identification number (if applicable) of the transporter delivering the used oil to the receiving facility;
    - (2) The name, address and EPA identification number (if applicable) of the oil-burner, processor/re-refinery or disposal facility receiving the shipment;
    - (3) The quantities of used oil shipped and date of shipment; and
    - (4) The laboratory analytical results.
  - (c). Record Retention: The records described in paragraph (a) and (b) of this section must be maintained for at least five years. The records shall be kept at the permitted facility and shall be available for inspection by the Department during normal business hours.
  - (d). The Permittee shall maintain documentation of any shipment of used oil that is refused due to failure to meet pre-screening requirements set forth in Attachment 3 of the permit application dated July 11, 2005 and as revised on January 9, 2006.
2. Pursuant to 40 CFR 279.57, the Permittee must keep a written operating record at the Facility and maintained until closure of the Facility, which includes the following information:
- (a) Records and results of used oil analyses performed as described in the analysis plan required under 40 CFR 279.55; and described in Attachment 3 of the permit application dated July 11, 2005 and as revised on January 9, 2006.
  - (b) Summary reports and details of all incidents that require implementation of the contingency plan as specified in 40 CFR 279.52(b).

(c) All records required by condition 1 of this Part

3. The Permittee shall maintain as part of the operating record of the Facility the inspection records and release detection monitoring records required in Rule 62-762.601, F.A.C., for aboveground storage tanks, integral piping, and process tanks. Reports of releases greater than twenty-five (25) gallons shall include the amount, time of the release, time of the response and a description of the response. Reports of releases greater than fifty (50) gallons shall be submitted to the Department within fourteen (14) days. The Permittee shall inform the Department within fourteen (14) days if a release requires the Permittee to take any of the tanks out of the service.
4. The Permittee shall maintain and operate the facility to minimize the possibility of fire, explosion, or any unplanned sudden or non-sudden release of used oil, sludge, residues or constituents to air, soil, or surface water which could threaten human health or the environment, in accordance with 40 CFR 279.52(1).
5. Pursuant to Rule 62-710.800(3), F.A.C., aboveground storage and process tanks having a capacity greater than 550 gallons, and all integral piping shall comply with the performance standards for new tanks of Rule 62-762.501, F.A.C., for existing shop fabricated/field erected tanks of Rule 62-762.511, F.A.C. Repairs to aboveground storage and process tanks shall meet the criteria of Rule 62-762.701, F.A.C.
6. The Permittee shall prevent the release of used oil, oily waste or oily wastewater to the environment. The secondary containment system shall be maintained in accordance with the permit application and shall comply with the requirements of 40 CFR 279.54, including the requirements set forth below:
  - (a). All new components shall have secondary containment as required by parts (b) and (c) of this condition prior to being put into service.
  - (b). The secondary containment system shall meet the requirements of 40 CFR 279.54 and shall be:
    - (1) Designed, installed and operated to prevent any migration of wastes or accumulated liquid to the soil, groundwater or surface waters.
    - (2) Provided with a visual leak detection system designed and operated to detect failure of either the primary or secondary containment structures or the presence of any release within one month, but no more than 35 days, by documented visual inspection.
    - (3) Constructed of or lined with materials compatible with the waste to be stored and have sufficient strength to sustain the stresses induced by a failure of the primary containment system as well as other stresses that may be induced by the environment.
    - (4) Placed on a foundation or base capable of providing support to the secondary containment system.
    - (5) Provided with visual leak detection to detect failure of either the primary or secondary containment structures or the presence of any release within one month, but no more than 35 days.

- (6) Sloped or otherwise designed and operated to drain or remove liquids resulting from leaks, spills, or precipitation.
- (7) Designed and operated, to contain 110% of the capacity of the largest tank within its boundary.
- (c). Ancillary equipment shall be provided with secondary containment.

### **PART III – PETROLEUM CONTACT WATER PROCESSING CONDITIONS**

1. The Permittee shall ship or accept petroleum contact water (PCW) only by using a transporter who is a registered hazardous waste transporter in compliance with Rule 62- 730-170, F.A.C., or has received a DEP/EPA ID number by notifying the Department on DEP/EPA Form 8700-12FL of its intent to transport PCW.[62-740.200(2), F.A.C.]
2. The Permittee shall label or mark all containers or tanks which are used for the storage of petroleum contact water with the words “Petroleum Contact Water” or “PCW”. [62-740.100, F.A.C.]
3. The Permittee shall store PCW only in those containers or tanks which are made of or lined with materials which will not react with and are otherwise compatible with the waste to be stored. PCW received into the Facility may be commingled and stored in Facility tanks with other petroleum or used oil-contaminated water for processing and recovery in accordance with Attachment 2 of the permit application.
4. If a container holding PCW is not in good condition (e.g. rusting, bulging) or begins to leak, the Permittee shall either over pack the container or transfer the waste to another container or tank which is in good condition. [40 CFR 279.22]
5. The Permittee shall store or treat PCW in tanks registered under the specifications of Rule 62-762, F.A.C. or in containers or tanks that do not require registration but meet the requirements of 62-740.100(2), F.A.C. [62-740.300(2)(a) and (b), F.A.C.]
6. The Permittee shall test and manage all waste residuals after the recovery of product from PCW in accordance with Chapter 62-730, F.A.C., or other applicable rules of the Department [62-740.300(6), F.A.C.].
7. The Permittee shall maintain the following records for a minimum of three years [62-740.300(2)(c), F.A.C.
  - (a) For each shipment of PCW received.
    - (1) Name and address of the PCW producer.
    - (2) Name and address of the PCW transporter.
    - (3) Date of receipt of the PCW shipment.
    - (4) Volume of PCW received.

- (5) A copy of the shipping paper used for shipment of the PCW.
  - (6) Have on file written assurances from the producers that the PCW does not contain levels of hazardous constituents above those found in the source of the PCW [62-740.300(4), F.A.C.].
  - (b) Weekly PCW container or tank inspections as required in 62-740.100(2)(c), F.A.C.
  - (c) Records to demonstrate that, under normal operating practices, the Facility recovers product from PCW [62-740.300(3), F.A.C.].
8. The Permittee shall submit an annual report covering petroleum contact water (PCW) activities for the previous year by March 1 of each year. The report shall include:
- (a) The total quantity of PCW received during the previous calendar year.
  - (b) An estimate of the total quantity of product recovered from the PCW as described in Attachment 2 of the permit renewal application dated July 11, 2005 and as revised on May 25, 2010 and pursuant to 62-740.300(5), F.A.C.

#### **PART IV – TANK AND CONTAINER CONDITIONS**

“Tank system”, for the purpose of Part IV of this permit, is defined as storage tank(s), appurtenant equipment and secondary containment structure comprising the Permittee used oil processing facility.

1. The Permittee shall prevent the release of petroleum contact water, used oil, oily waste or oily wastewater to the environment. The secondary containment system shall be maintained in accordance with the permit application and shall comply with the requirements of 40 CFR 279.54, including the requirements set forth below:
- (a) All new components shall have secondary containment as required by 40 CFR Part 279.54 and Parts (b) and (c) of this condition prior to being put into service.
  - (b) The secondary containment system shall meet the requirements of 40 CFR 279.54 and Rule 62-762, F.A.C. shall be:
    - (1) Designed, installed and operated to prevent any migration of waste or accumulated liquid to the soil, groundwater or surface waters.
    - (2) Capable of detecting and collecting releases and run-on until the collected material is removed.
    - (3) Constructed of, or lined with materials compatible with the waste to be stored and of sufficient strength to sustain the stresses induced by failure of the primary containment system as well as other stresses that may be induced by the environment.
    - (4) Placed on a foundation or base capable of providing support to the secondary containment system.



- (5) Provided with a visual leak detection system designed and operated to detect failure of either the primary or secondary containment structures or the presence of any release within one month, but no more than 35 days, by documented visual inspection.
  - (6) Sloped or otherwise designed and operated to drain or remove liquids resulting from leaks, spills, or precipitation.
  - (7) Designed and operated, to contain 110% of the capacity of the largest tank within its boundary.
- (c) Ancillary equipment shall be provided with secondary containment.
- 2. The Permittee shall, in the event of a release:
  - (a) Stop the release;
  - (b) Contain the release;
  - (c) Clean up and manage properly the released waste and other materials; and
  - (d) If necessary, repair or replace any leaking storage containers or tanks prior to returning them to service [40 CFR Part 279.54(g)].
- 3. The Permittee shall, as part of the general operating requirements:
  - (a) Not place petroleum contact water, used oil, other wastes or treatment reagents in a tank system if the possibility exists that this may cause the tank system to fail;
  - (b) Use appropriate controls and practices to prevent spills and overflows;
  - (c) Follow the Operating Procedures described in Attachment 2 of the permit application; and
  - (d) Comply with the requirements of 40 CFR Part 279.54(g) if a leak or spill occurs.
- 4. The Permittee shall label or mark all above ground tanks and containers used to store or process used oil, with the words "Used Oil". [40 CFR 279.54(f)]
- 5. The Permittee shall store used oil only in those containers or tanks which are made of or lined with materials which will not react with and are otherwise compatible with the waste to be stored.
- 6. If a container holding used oil is not in good condition (e.g. rusting, bulging) or begins to leak. The Permittee shall either over pack the container or transfer the waste to another container or tank which is in good condition. [40 CFR 279.22]
- 7. The Permittee shall inspect all regulated tank systems in accordance with procedures presented in Attachment 7 of the permit application dated July 11, 2005 and as revised on October 12, 2010.
- 8. The Permittee shall remove spilled or leaked waste within three (3) days [Rule 62-762.821(1)(d), F.A.C.]. Accumulated precipitation must be removed from the secondary containment areas within one week after a rainfall event [Rule 62-762.701(2)(b), F.A.C.]. The above materials shall be

managed in accordance with Attachment 2 of the permit application dated July 11, 2005 and as revised on May 25, 2010.

9. The Permittee shall keep containers closed except when adding or removing waste.

**PART V – NON-HAZARDOUS, NON-USED OIL WASTE CONDITIONS (WASTE PROCESSING ACTIVITIES)**

1. The facility may accept petroleum contaminated non-hazardous solid wastes including without limitations those generated from petroleum contaminated soils, sludges, and debris, Personal Protection Equipment (PPE) or other petroleum non-hazardous waste streams. Such wastes not containing removable used oil can be sent to the Facility for bulking and/ or sent directly to a permitted Solid Waste Disposal facility. Permittee shall bulk and/or process such waste for acceptance at permitted solid waste disposal or processing facilities.
  - (a) Permittee shall receive all wastes delivered to the Facility for solidification and processing in drums, roll-offs, and/or vacuum trucks. All drums and roll-offs will be temporarily stored on the solid waste pad. Vacuum truck waste will be off-loaded into treatment tank #111 or cone bottom tank #110. Further processing shall be in accordance with Attachment 4 of the permit application.
  - (b) Permittee shall analyze all waste in accordance with the Analysis Plan in Attachment 3 of the permit application dated July 11, 2005 and as revised on January 9, 2006. Only non-hazardous waste may be processed. Waste that is characterized as being hazardous shall be properly transported to a facility permitted to accept hazardous waste, in accordance with the provisions of Paragraph 18 of Part I.
  - (c) The amount of waste at the Facility at any one time shall not exceed 120 tons of solids in drums and roll off containers, plus 22, 000 gallons of liquids in drums (not including used oil filters in drums and containers).
  - (d) Permittee shall perform Solid Waste Processing as described in the used oil processing permit application.
    - (1) A maximum of 20% (40,000 gallons) of solid waste accepted at the facility annually can be disposed of with little or no processing to permitted solid waste landfill. Solid waste qualifying for this disposal option includes petroleum contaminated soils, petroleum contaminated debris, and drums of grease and asphaltic material.
    - (2) A minimum of 80% (200,000 gallons) of solid waste accepted at the facility annually must be processed for oil reclamation and water recovery. The solids remaining following processing must go for energy recovery.
    - (3) Waste water treatment sludges generated at the facility will not be counted towards the facility annual solid waste accepted total. It is a solid waste generated at the facility.

2. The Permittee shall within 30-days of the permit issuance date develop an internal training program for approval by the Department in accordance with 62-701.320(15), F.A.C., to adequately train personnel to inspect the waste streams for unauthorized, non-approved and nonconforming waste streams. This training program shall be implemented within 30 days of approval and shall contain provisions for initial training with continuing education training every three years with documentation of the training. The spotter duties will be completed in the receiving area where the waste containers are opened up for incoming inspection.
3. A trained spotter will be present when waste is being received to inspect the waste streams for unauthorized, non-approved and nonconforming waste streams. The spotter will be able to identify and stop the following waste from entering the facility: hazardous waste, PCB's, asbestos waste, explosives, putrescible, toxic waste, biohazardous waste, non-approved and nonconforming waste streams.
4. Training records for spotters shall be maintained at the facility for three years. New personnel shall not be allowed to act as spotters without undergoing spotter training. New personnel that have demonstrated to the facility manager a competency based on experience, education, and training may perform as an interim spotter. An interim spotter must become a trained spotter within three months of employment as an interim spotter.
5. Unauthorized wastes non-approved and nonconforming waste streams will be placed in a proper Department of Transportation shipping container. The containers are placed in a secondary containment unit, which will be located between the west loading/unloading area and the drum storage area. The unauthorized waste will be marked "UNAUTHORIZED WASTE" and will be wrapped with yellow caution tape. Pursuant to Rule 62-701.710(4)(b), F.A.C., stored putrescible wastes shall not be allowed to remain at the facility for more than 48 hours. The putrescible waste will be shipped to a permitted solid waste facility for proper treatment or disposal. Any other unauthorized waste received such as hazardous waste, PCB's asbestos waste, explosives, toxic waste, biohazardous waste, non-approved and nonconforming waste streams by the facility shall be segregated and transported to an authorized disposal or recycling facility within 30 days of receipt. The waste generator and the Florida Department of Environmental Protection Southwest District will be notified of the unauthorized waste.

## **PART VI – CLOSURE CONDITIONS**

1. The Permittee shall close the facility in compliance with 40 CFR 279.54(h), 62-710.800(9), F.A.C. and Attachment 8, closure plan of the permit application dated July 11, 2005 and as revised on January 9, 2006. The closure plan requires at a minimum the following:
  - (a) Test residue in the tanks. If the residue is hazardous, follow the closure plan in Attachment 8 of the permit application dated July 11, 2005 and as revised on January 9, 2006.
  - (b) Remove and properly dispose any non-hazardous residue.
  - (c) Triple rinse the tanks, piping and ancillary equipment.
  - (d) Remove the tanks and piping to a scrap steel dealer.

- (e) Submit a closure report, within thirty (30) days after closing these tanks, that describes the closure process and includes documentation of:
  - (1) The weight of #1 heavy metal scrap sold.
  - (2) The weight of other scrap sold, by classification.
  - (3) The weight of scrap disposed and how disposed.
  - (4) An inventory of the valves and fittings that were retained for future application.
  - (5) A statement that the tanks and piping have been completely removed and that everything removed is included in the above listing.
- 2. The Permittee shall maintain an approved written closure plan and it must demonstrate how the facility will be closed in accordance with Attachment 8 of the permit application dated July 11, 2005 and subsequent revisions dated January 9, 2006 in order to meet the following requirements that:
  - (a) There will be no need for further Facility maintenance;
  - (b) Used oil will not contaminate soil, surface water or groundwater;
  - (c) All tanks, piping, secondary containment & ancillary equipment will be emptied, cleaned and decontaminated, and all materials removed and managed;
  - (d) Aboveground storage tanks and process tanks and all integral piping will be closed pursuant to Rule 62-762.801, F.A.C.
  - (e) Permittee who store or process used oil in above ground tanks must, pursuant to closure requirements of 40 CFR 279.54(h), remove or decontaminate used oil residues in tanks, contaminated containment system components, contaminated soil, and structures and equipment contaminated with used oil, and manage them as hazardous waste, unless the materials are not hazardous waste as defined in 40 CFR 261 or determined, pursuant to 40 CFR 262.11;
  - (f) The closure plan, as described in Attachment 8 of the renewal permit application dated July 11, 2005 and as revised on January 9, 2006 shall be updated whenever significant operational changes occur or design changes are made;
  - (g) The closure plan shall be maintained with records required under Rule 62-710.510, F.A.C.
  - (h) The Permittee shall submit an updated and detailed plan to the Department at least sixty (60) days prior to the schedule date of closing the Facility; and
  - (i) The Permittee shall submit a certification of closure completion to the Department that demonstrates that the Facility was closed in substantial compliance with the approved closure plan, within thirty (30) days after closing the Facility.

Hagan Holding Company  
Howco Environmental Services  
Saint Petersburg, Florida

I.D. Number FLD 152 764 767  
Permit Number : 33721-HO-002, 33721-SO-003  
Date of Expiration : August 03, 2015

3. Within ninety (90) days of determining that the Facility cannot be clean closed under this permit, the Permittee shall submit a permit application to close the tank system(s) and perform post-closure care in accordance with the closure and post-closure requirements of 40 CFR 264.310 that apply to hazardous waste landfills and in accordance with Chapter 62-770, F.A.C..
4. Containers: Permittee who store used oil in containers must, pursuant to closure requirements of 40 CFR 279.54(h), comply with the following requirements:
  - (a) At closure, containers holding used oil or residues of used oil must be removed from the site; and
  - (b) The Permittee must remove or decontaminate used oil residues, contaminated containment system components, contaminated soils, and structures or equipment contaminated with used oil, and manage them as hazardous waste unless the materials are not hazardous waste as defined in 40 CFR 261 or determined, pursuant to 40 CFR 261.11.
5. Solid Waste: All solid waste will be removed from the site and recycled or disposed in accordance with the requirements of Chapter 62-701.710(6).
6. At closure, containers, drums, and disposal quantities are as identified in Howco's letter dated December 1, 2006 and DEP approved letter dated December 22, 2006.

Issued June 2, 2011

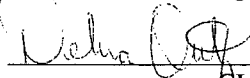
STATE OF FLORIDA DEPARTMENT  
OF ENVIRONMENTAL PROTECTION



Charles F. Goddard, Chief  
Bureau of Solid and Hazardous Waste

#### FILING AND ACKNOWLEDGMENT

Filed on this date, pursuant to Section 120.52, Florida Statutes, with the designated Clerk, receipt of which is acknowledged.

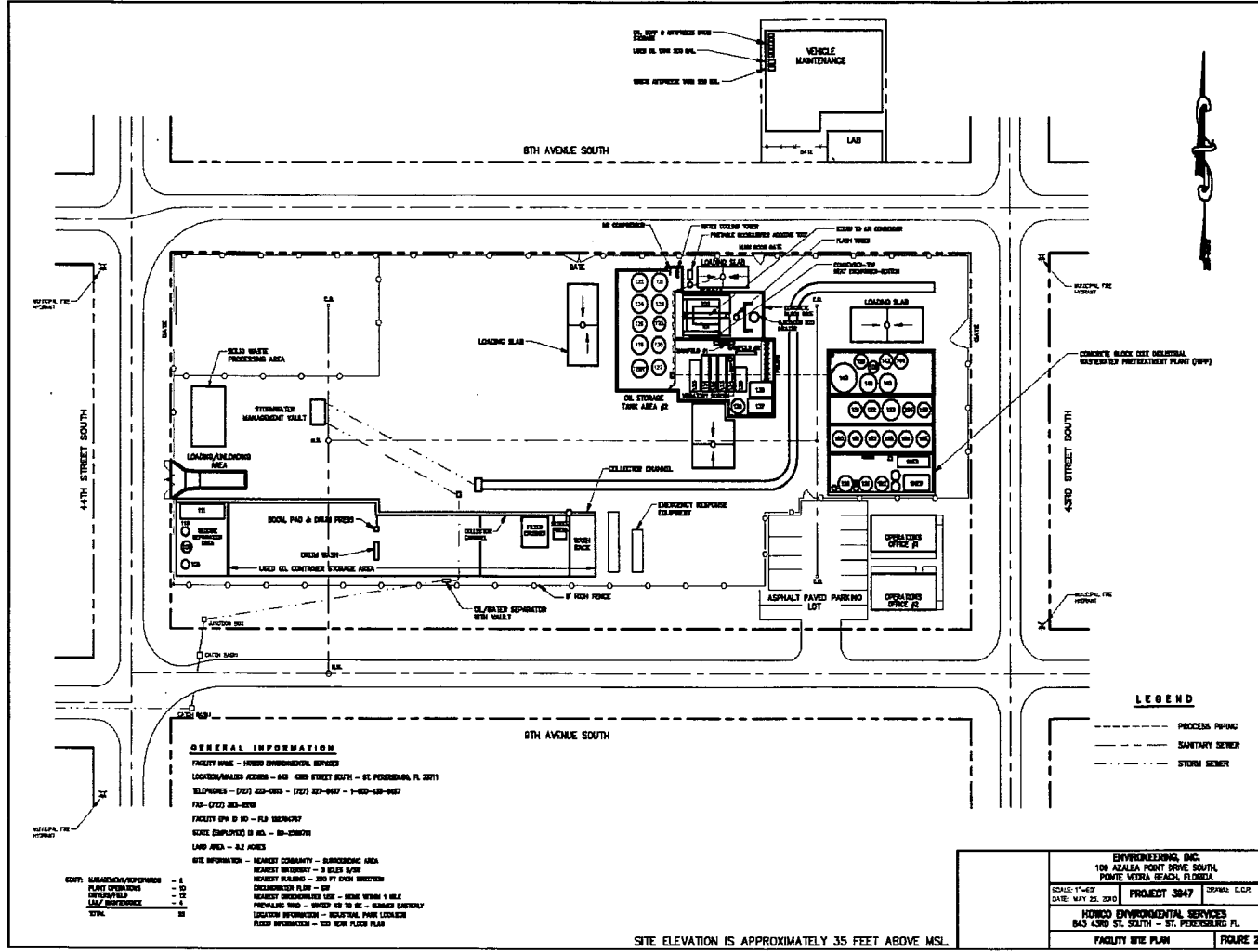


CLERK

June 2, 2011

DATE

## ATTACHMENT-A SITE MAP



## ATTACHMENT B TANK TABLE

**Table 1**  
**Processing Tanks - Containment #1A**

Tank Number	Capacity (gallons)	Product
100	30300	Used oil treatment
101	28800	Used oil treatment
130	7950	Oil receiving
131	3950	Oil receiving
132	3950	Oil receiving
133	3950	Oil receiving
134	3950	Screened oil
135	6000	Light ends, condensate
136	10000	Light ends
137	10570	Burner fuel oil
170	11150	Used oil, water soluble oil, antifreeze or wastewater

Products stored in various tanks may change from time to time depending on market conditions.

**Table 2**  
**Processing Tanks - Containment 1B**

Tank Number	Capacity (gallons)	Product
120	19550	Unprocessed oil
121	28900	Processed oil
122	29730	Processed oil
123	29730	Processed oil
124	29730	Processed oil
125	19210	Processed oil
126	20820	Processed oil
127	19470	Processed oil
128R1	19470	Receiving oil
129	23460	Processed oil

Products stored in various tanks may change from time to time depending on market conditions.

Containment area 2 has no tanks.

**Table 3**  
**Containment Area #5**

Tank Number	Capacity (gallons)	Product
108	9980	IWPP Sludge
109	3225	Used Oil
110	6415	Oily Solids
111	19380	Oily Solids

## Honey, Kelly

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**From:** Honey, Kelly  
**Sent:** Thursday, September 20, 2012 3:01 PM  
**To:** 'thagan@howcousa.com'  
**Cc:** 'Lee Morris'; 'Richard Dillen'  
**Subject:** report for 08-10-12 inspection of HOWCO Environmental Services (FLD 152 764 767)

**Categories:** OCULIZED

Dear Mr. Hagan:

Thank you for the assistance and cooperation of your staff during the Department of Environmental Protection's August 10, 2012, Hazardous Waste Compliance Evaluation Inspection.

Attached is a copy of the inspection report generated from the inspection. As the violations noted in the report have been addressed, no enforcement action will be taken. If you have any questions or concerns regarding the inspection or this email, please don't hesitate to contact me. Please note a response to this email is not required.



HOWCO\_ins  
report\_FFY12.

Sincerely,  
Kelly Honey  
Environmental Specialist III  
FL Department of Environmental Protection  
RCRA Compliance and Enforcement  
T: 813/632-7600, ext. 369  
F: 813/632-7664

Please Note: Florida has a very broad public records law. Most written communications to or from state officials regarding state business are public records available to the public and media upon request. Your e-mail communications may therefore be subject to public disclosure.





Florida Department of  
Environmental Protection  
Hazardous Waste Inspection Report

**FACILITY INFORMATION:**

**Facility Name:** HOWCO Environmental Services

**On-Site Inspection Start Date:** 08/10/2012

**On-Site Inspection End Date:** 09/05/2012

**ME ID#:** 1038

**EPA ID#:** FLD152764767

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

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

**County Name:** Pinellas

**Contact Phone:** (727) 327-8467

**NOTIFIED AS:**

CESQG (<100 kg/month)

Used Oil

**INSPECTION TYPE:**

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

Routine Inspection for Used Oil Processor facility

Routine Inspection for Used Oil Marketer facility

Routine Inspection for Used Oil Generator facility

Routine Inspection for Used Oil Transporter facility

**INSPECTION PARTICIPANTS:**

Principal Inspector: Kelly M. Honey, Environmental Specialist III

Other Participants: Richard Dillen, Quality Assurance Officer; Lee Morris, Director of Operations

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

**SIC CODE:** 2911 - Manufacturing - petroleum refining

**TYPE OF OWNERSHIP:** Private

**Introduction:**

HOWCO Environmental Services (HOWCO) was inspected by the Department of Environmental Protection (Department) to evaluate the facility's compliance with state and federal hazardous waste regulations. The inspector was accompanied throughout by Richard Dillen, who manages the Laboratory, with additional assistance provided by Lee Morris, who manages the Yard. The facility was most recently inspected by the Department's Hazardous Waste Section on August 31, 2011. HOWCO has a used oil and solid waste processing permit issued by the Department on June 2, 2011. The permit expires on August 3, 2015.

**Process Description:**

HOWCO stores, processes and markets used oil and is a registered used oil filter transporter and processor, as well. Additionally, HOWCO accepts oily waste solids which are processed and solidified prior to disposal. As a result of the lab wastes generated during QA testing, HOWCO is also a conditionally exempt small quantity generator of hazardous waste (CESQG). The facility is on City of St. Petersburg water and sewer systems. The processes at the facility have not changed since the previous inspection.

The overall appearance of the yard was relatively tidy. The facility was in the process of resurfacing the solid waste processing pad and recoating the whole area on the south side of the facility comprised of the drum washing area, the used oil filter processing area and the solid waste processing pad. HOWCO now has 48 aboveground storage tanks (ASTs), storing petroleum contact

Inspection Date: 08/10/2012

water (PCW), used oil, etc. The emergency address system (i.e., the bullhorn) was not operable at the time of the inspection. This has since been corrected. The fire and emergency equipment are inspected monthly and tested annually.

HazMat supplies are stored in one of three large trailers on the south side of the property. The contents of the HazMat trailer included personal protective equipment as well as spill control equipment. In the used oil filter processing area, there were approximately 72 drums of used oil filters, all of which were labeled and protected from the weather.

At the time of the inspection, there was one roll-off on the solid waste processing pad, and several that were being stored on the east side of the facility while the pad was being resurfaced. In accordance with the permit, all solid waste received at the facility must be stored on an impervious surface. After the inspection, the roll-offs were relocated. The solid waste storage pad no longer has steel plates covering the top. The pad appears to be constructed on concrete and has been coated, but the coating was already scrapped off under the single roll-off placed on it. The Department recommends replacement of the steel plates as soon as possible to prevent equipment from removing the impervious coating. It is unknown whether the concrete is lined underneath.

Solid waste managed at the facility includes oily solid waste generated by HOWCO and its customers. The WTU sludge and the oil-extracted sludge generated at the facility is analyzed annually. The wastewater treatment sludge was last sampled June 6, 2012, and the oil-extracted sludge was sampled on July 20, 2012. Results indicate that both waste streams are nonhazardous. Solid waste is either sent to a landfill or to the waste-to-energy incinerator. HOWCO appears to be under both its 40,000-gallon limit for sending received solid wastes to a landfill and its 200,000-gallon limit for sending received solid wastes to an energy recovery facility.

The Maintenance Shop generates used oil filters, used oil, used antifreeze and oily waste. There is also a 25-gallon parts washer in use. Spent solvent from the parts washer is disposed of with the shop's used oil. Used oil and antifreeze containers are equipped with secondary containment. Batteries are returned to the vendor for core credit. It was noted that the area next to the Maintenance Shop contained no wastes.

Behind the laboratory, there are two 55-gallon drums of used oil in secondary containment. The drums are covered and labeled. The drums collect sample waste from the laboratory. Processed oil is randomly sampled biweekly and tested to confirm it is on-spec. Analyses are done off site by PhosLab. Samples of processed oil are retained in the laboratory for thirty days. Hazardous COD testing waste is generated in the laboratory, and spent vials are accumulated in a box labeled "spent vials." Staff said fluorescent lamps are taken on CESQG days to the County collection center for disposal, which is also how laboratory wastes are disposed of. Hazardous wastes have not been disposed of since the last inspection.

Records were reviewed and found to be complete and up to date with the following exception. The latest revision of the contingency plan was not sent to required entities, such as the police fire departments. The revised plan has since been sent out. As noted in the previous inspection, HOWCO has switched to an electronic record keeping system that is used company wide. The acceptance and delivery records listed all three HOWCO transporter facilities and their EPA ID numbers on the records, but there was no indication which actually transported the used oil. During the records review, it was noted that records generated after May 2012 now indicate which HOWCO facility transported the load. There are still some issues with some documentation associated with some pickups, such as waste profiles. HOWCO employees, including the designated emergency coordinators, received required training December 2011.

## **New Potential Violations and Areas of Concern:**

### **Violations**

Type: Violation

Inspection Date: 08/10/2012

Rule: 279.52(a)(2)(i)

Explanation: The facility utilizes a bullhorn to meet this requirement. At the time of the inspection, the bullhorn did not work. (corrected)

Corrective Action: The batteries in the bullhorn were replaced, and the device is now operable.

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Type: Violation

Rule: 279.52(b)(3)(ii)

Explanation: At the time of the inspection, the latest revision of the contingency plan had not been sent out to required entities. (corrected)

Corrective Action: After the inspection, the revised plan was sent to all previous recipients.

---

Type: Violation

Rule: 403.727(1)(c)

Explanation: At the time of the inspection, there were several roll-offs of solid waste being stored off the solid waste processing pad. (corrected)

Corrective Action: After the inspection, the roll-offs were relocated.

---

#### **Areas of Concern**

Type: Area Of Concern

Rule: 403.727(1)(c)

Explanation: The facility has moved to electronic record keeping. At the time of the inspection, there were two receipts for the pick up of solid waste oily absorbent material, but the waste profile for the material was not available through the electronic system.

Additionally, the solid waste processing pad no longer has steel plates protecting it from scrapes and damage from heavy equipment. There was already one scrape with the coating removed during the inspection. The Department is concerned that the pad will not remain impervious without the steel plates.

Corrective Action: HOWCO needs to improve its electronic record keeping system to ensure that it meets the requirements of the rule and its permit.

The Department recommends replacing the steel plates on the solid waste processing pad.

---

#### **Conclusion:**

Based on the observations made during this inspection, HOWCO was found to be out of compliance with rules governing used oil processors. The facility has since returned to compliance.

Inspection Date: 08/10/2012

Inspection Date: 08/10/2012

**Signed:**

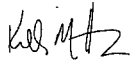
A hazardous waste compliance inspection was conducted on this date, to determine your facility's compliance with applicable portions of Chapters 403 & 376, F.S., and Chapters 62-710, 62-730, 62-737, & 62-740 Florida Administrative Code (F.A.C.). Portions of the United States Environmental Protection Agency's Title 40 Code of Federal Regulations (C.F.R.) 260 - 279 have been adopted by reference in the state rules under Chapters 62-730 and 62-710, F.A.C. The above noted potential items of non-compliance were identified by the inspector(s).

This is not a formal enforcement action and may not be a complete listing of all items of non-compliance discovered during the inspection.

Kelly M. Honey

**PRINCIPAL INSPECTOR NAME**

Environmental Specialist III

**PRINCIPAL INSPECTOR TITLE****PRINCIPAL INSPECTOR SIGNATURE**

FDEP

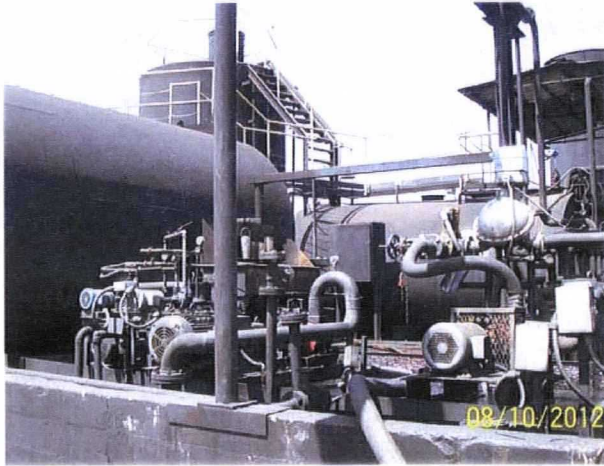
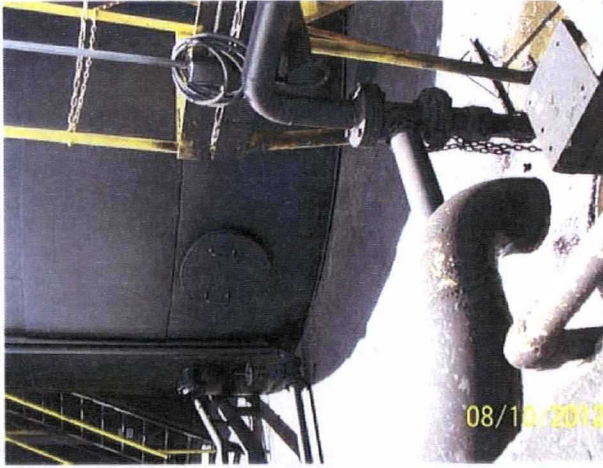
**ORGANIZATION**

9/14/2012

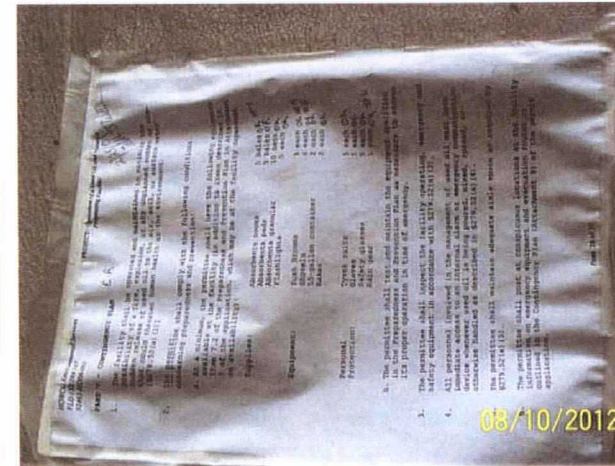
**DATE****Supervisor:**James Dregne

NOTE: By signing this document, the Site Representative only acknowledges receipt of this Inspection Report and is not admitting to the accuracy of any of the items identified by the Department as "Potential Violations" or areas of concern.













08/10/2012



08/10/2012



08/10/2012



- ALL DRUMS MUST BE SECURELY CLOSED.
- ALL DRUMS MUST HAVE A COMPLETED WASTE LABEL AFFIXED.
- ALL DRUMS MUST HAVE AN APPROPRIATE HAZARD CLASS LABEL AFFIXED.
- CURRENT DRUM STORAGE AND DISPOSAL LOG MAINTAINED.
- KEEP STORAGE AREA CLEAN AND SWEEPED.
- THINK "SAFETY".

08/10/2012



08/10/2012



08/10/2012



08/10/2012



08/10/2012

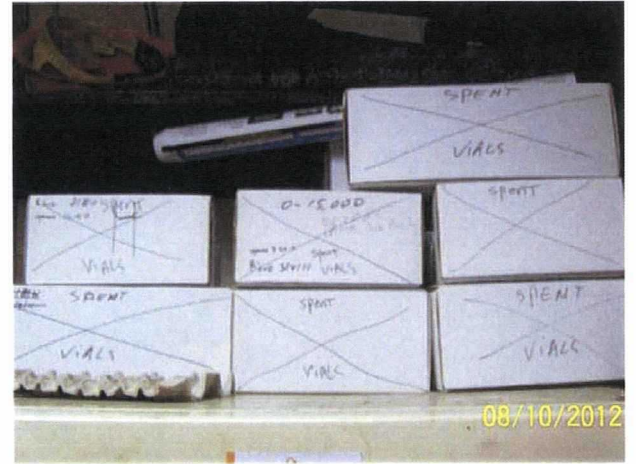


08/10/2012





Inserted into OCULUS  
 SEP 20 2012  
 Initials: AKA





February 27, 2012

Used Oil Coordinator, MS4555  
Department of Environmental Protection  
2600 Blair Stone Rd.  
Tallahassee, FL 32399-2400

To whom it may concern:

This letter is intended to respond to HOWCO Environmental Services' requirement to file an annual report on PCW activity by the company. The PCW is accumulated and processed at our St. Petersburg facility. Our process is both thermal and gravity separation therefore recovers the majority if not all product present in PCW streams collected and brought to our facility.

For calendar year 2011 HOWCO Environmental Services collected about **14,000 gallons of PCW**. HOWCO recovered approximately **700 gallons of product** that was blended into our #5 fuel oil.

We trust that this letter will answer any questions regarding PCW activity by HOWCO Environmental Services. If we can be of further assistance please do not hesitate to contact us at (727)-437-4059.

Sincerely,

Richard Dillen  
Quality Assurance Officer  
HOWCO Environmental

Cc: Mr. Jim Dregne, FDEP-Tampa  
File

3701 Central Avenue - St. Petersburg, FL 33713 - Tel. 727-327-8467 Fax: 727-321-6213

Operations: Tampa Bay - Ft. Myers - 24-Hour Emergency Access 1-800-435-8467

3/6



# Florida Department of Environmental Protection

Southwest District  
13051 North Telecom Parkway  
Temple Terrace, Florida 33637-0926  
Telephone: 813-632-7600

Rick Scott  
Governor

Jennifer Carroll  
I.L. Governor

Herschel T. Vinyard Jr.  
Secretary

October 13, 2011

Sent via email only  
[thagan@howcousa.com](mailto:thagan@howcousa.com)

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

**Re: HOWCO Environmental Services  
EPA ID # FLD 152 764 767  
Pinellas County**

Dear Mr. Hagan:

Thank you for your assistance and cooperation during the Department of Environmental Protection's August 31, 2011, Hazardous Waste Compliance Evaluation Inspection.

Enclosed is the inspection report generated from this visit. Based upon the information gathered during the inspection, HOWCO Environmental Services was found to be in compliance with its permit and the regulations governing used oil processors, transporters, marketers and conditionally exempt small quantity hazardous waste generators.

If you have any questions, please feel free to call me at (813) 632-7600, extension 369.

Sincerely,

Kelly M. Honey  
Environmental Specialist III  
Division of Waste Management  
Southwest District

/kmh

enclosure

cc: Lee Morris, HOWCO Environmental ([LeeMorris@howcousa.com](mailto:LeeMorris@howcousa.com))  
Gene Quinn, Pinellas County SQG Program ([gquinn@pinellascounty.org](mailto:gquinn@pinellascounty.org))

Inserted into OCULUS

OCT 19 2011

Initials: VA



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

---

**FACILITY INFORMATION:**

**Facility Name:** HOWCO Environmental Services

**On-Site Inspection Start Date:** 08/31/2011

**On-Site Inspection End Date:** 08/31/2011

**ME ID#:** 1038

**EPA ID#:** FLD152764767

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

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

**County Name:** Pinellas

**Contact Phone:** (727) 327-8467

**NOTIFIED AS:**

Non-Handler

Used Oil

**INSPECTION TYPE:**

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

Routine Inspection for Used Oil Processor facility

Routine Inspection for Universal Waste Transporter facility

Routine Inspection for Used Oil Marketer facility

**INSPECTION PARTICIPANTS:**

**Principal Inspector:** Kelly M. Honey, Environmental Specialist III

**Other Participants:** Shannon Camp, Environmental Specialist III; Richard Dillen, Quality Assurance Officer; Lee Morris, Director of Operations

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

**SIC CODE:** 2911 - Manufacturing - petroleum refining

**TYPE OF OWNERSHIP:** Private

**Introduction:**

HOWCO Environmental Services (HOWCO) was inspected by the Department of Environmental Protection (Department) to evaluate the facility's compliance with state and federal hazardous waste regulations. The inspectors were accompanied throughout by Richard Dillen, who manages the Laboratory, and Lee Morris, who manages the Yard. In the past ten years, the facility has been inspected by the Department nine times, most recently on June 24, 2010. HOWCO has a used oil and solid waste processing permit issued by the Department on June 2, 2011. The permit expires on August 3, 2015.

**Process Description:**

HOWCO stores, processes and markets used oil and is a registered used oil filter transporter and processor, as well. Additionally, HOWCO accepts oily waste solids which are processed and solidified prior to disposal. As a result of the lab wastes generated during QA testing, HOWCO is also a conditionally exempt small quantity generator of hazardous waste (CESQG). At the plant, there are currently five employees, plus two recovery truck drivers and one tanker trailer driver. The facility is on City of St. Petersburg water and sewer systems. The processes at the facility have not changed since the previous inspection.

The overall appearance of the yard was relatively tidy. HOWCO now has 48 aboveground storage tanks (ASTs), storing petroleum contact water (PCW), used oil, etc. All of the ASTs were recently repainted, and none were observed to have open access ports. One of the facility's bullhorns was tested and found to be operable, although the cabinet in which it is stored needs repair. The fire



Inspection Date: 08/31/2011

and emergency equipment are inspected monthly and tested annually. It was noted that the person responsible for inspections, Tim Hagan, Jr., while noting deficiencies, was not recording the date and nature of associated corrective actions. The Department recommends that this information be recorded and maintained as part of the operating record.

HazMat supplies are stored in one of three large trailers on the south side of the property. The contents of the HazMat trailer included personal protective equipment as well as spill control equipment. Since the previous inspection, HOWCO has added its list of emergency equipment to the contingency plan in accordance with 40 CFR 279.52(b)(2)(v). In the used oil filter processing area, there were approximately 38 empty drums, 19 drums of used oil filters, and 11 large bins of used oil filters in storage. All the containers were labeled.

At the time of the inspection, there were three properly labeled 20 cubic yard roll-offs of oily solid waste (e.g., oily filter paper, oily sludge) on the solid waste storage pad, along with a parked truck of solid waste. Nearby were approximately 36 drums of oily absorbent material in the oily waste staging area. The solid waste storage pad is constructed of thick HDPE and is covered with welded steel plates to protect the lining. The plates were noted to be in need of repair. The Department recommends repair of the steel plates as soon as possible to prevent equipment from either tearing the liner directly, or from causing a bent and damaged steel plate to tear it or wear a hole in it.

Solid waste managed at the facility includes oily solid waste generated by HOWCO and its customers. Solid waste streams received are analyzed at least once every five years in accordance with the permit. The WTU sludge and the oil-extracted sludge generated at the facility is to be analyzed annually. The sludge was last sampled June 8, 2011, and results indicate that both waste streams are nonhazardous. Solid waste is either sent to a landfill or to the incinerator. HOWCO is well under both its 40,000-gallon limit for sending received solid wastes to a landfill and its 200,000-gallon limit for sending received solid wastes to an energy recovery facility.

The Maintenance Shop generates used oil filters, used oil, used antifreeze and oily waste. There is also a 25-gallon parts washer in use. Spent solvent from the parts washer is disposed of with the shop's used oil. Used oil and antifreeze containers are equipped with secondary containment. Batteries are returned to the vendor for core credit. It was noted that the area next to the Maintenance Shop contained no wastes.

Behind the laboratory, there are two 55-gallon drums of used oil in secondary containment. The drums are covered and labeled. The drums collect sample waste from the laboratory. Processed oil is randomly sampled biweekly and tested to confirm it is on-spec. Analyses are done off site by PhosLab. Samples of processed oil are retained in the laboratory for thirty days. Hazardous COD testing waste is generated in the laboratory, and spent vials are accumulated in a box labeled "spent vials." Staff said fluorescent lamps are taken on CESQG days to the County collection center for disposal, which is also how laboratory wastes are disposed of. Hazardous wastes have not been disposed of since the last inspection. It was noted that the XRF analyzer unit had been shipped back to the manufacturer for repair. The lab was using Dexsil kits until the unit is returned, which should be within a week.

Records were reviewed and found to be complete and up to date with the following exception. Since the previous inspection, HOWCO has switched to an electronic recordkeeping system that is used company wide. As a result, the acceptance and delivery records list all three HOWCO transporter facilities and their EPA ID numbers on the records, but there is no indication which actually transported the used oil. HOWCO needs to clearly indicate which facility did the transporting on each record. In accordance with 40 CFR 279.52(b)(2)(iv), the contingency plan now lists the home addresses of all persons qualified to act as emergency coordinator. HOWCO employees, including all the designated emergency coordinators, attended a Used Oil Management Workshop in December 2010, which included required Spotter Training.

#### **New Potential Violations and Areas of Concern:**

#### **Checklist Independent Potential Violations and Areas of Concern**

Inspection Date: 08/31/2011

Type: Area Of Concern

Rule: 403.727(1)(a)

Explanation: In accordance with 62-701.710(3)(b), FAC, waste processing activities should be conducted at a facility with a leachate control system designed and operated prevent discharge of leachate and avoid mixing of leachate with stormwater, and to minimize the presence of standing water. The Department is concerned that the current condition of solid waste processing pad will result in a breach of the under liner, resulting in discharge of leachate. Additionally, the state of the steel over layer is now resulting in the presence of standing water after rainfall events.

Corrective Action: HOWCO needs to evaluate the condition of the leachate control system and make repairs or modifications as needed to ensure compliance with the Rule.

Type: Area Of Concern

Rule: 279.56(b)(1), 279.56(b)(3), 279.56(a)(3), 279.56(a)(1)

Explanation: The new recordkeeping system in use does not specify which of HOWCO's three facilities is the transporter.

Corrective Action: HOWCO needs to indicate which of its three facilities is the transporter on its delivery and acceptance records.

---

**Summary of Potential Violations and Areas of Concern:**Potential Violations

No Violations

Areas of Concern

Rule Number	Area	Date Cited	Explanation
Checklist Independent Areas of Concern			
403.727(1)(a)		08/31/2011	In accordance with 62-701.710(3)(b), FAC, waste processing activities should be conducted at a facility with a leachate control system designed and operated prevent discharge of leachate and avoid mixing of leachate with stormwater, and to minimize the presence of standing water. The Department is concerned that the current condition of solid waste processing pad will result in a breach of the under liner, resulting in discharge of leachate. Additionally, the state of the steel over layer is now resulting in the presence of standing water after rainfall events.
279.56(b)(1), 279.56(b)(3), 279.56(a)(3),		08/31/2011	The new recordkeeping system in use does not specify which of HOWCO's three facilities is the transporter.

Inspection Date: 08/31/2011

**Conclusion:**

Based on the observations made during this inspection, HOWCO was operating in compliance with its permit and rules governing used oil processors.

Inspection Date: 08/31/2011

**Signed:**

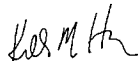
A hazardous waste compliance inspection was conducted on this date, to determine your facility's compliance with applicable portions of Chapters 403 & 376, F.S., and Chapters 62-710, 62-730, 62-737, & 62-740 Florida Administrative Code (F.A.C.). Portions of the United States Environmental Protection Agency's Title 40 Code of Federal Regulations (C.F.R.) 260 - 279 have been adopted by reference in the state rules under Chapters 62-730 and 62-710, F.A.C. The above noted potential items of non-compliance were identified by the inspector(s).

This is not a formal enforcement action and may not be a complete listing of all items of non-compliance discovered during the inspection.

Kelly M. Honey

**PRINCIPAL INSPECTOR NAME**

Environmental Specialist III

**PRINCIPAL INSPECTOR TITLE****PRINCIPAL INSPECTOR SIGNATURE**

FDEP

**ORGANIZATION**

10/12/2011

**DATE**

Shannon Camp

**INSPECTOR NAME**

Environmental Specialist III

**INSPECTOR TITLE**

NO SIGNATURE

**INSPECTOR SIGNATURE**

FDEP

**ORGANIZATION**

Richard Dillen

**REPRESENTATIVE NAME**

Quality Assurance Officer

**REPRESENTATIVE TITLE**

NO SIGNATURE

**REPRESENTATIVE SIGNATURE**

HOWCO Environmental Services

**ORGANIZATION**

Lee Morris

**REPRESENTATIVE NAME**

Director of Operations

**REPRESENTATIVE TITLE**

NO SIGNATURE

**REPRESENTATIVE SIGNATURE**

HOWCO Environmental Services

**ORGANIZATION**

NOTE: By signing this document, the Site Representative only acknowledges receipt of this Inspection Report and is not admitting to the accuracy of any of the items identified by the Department as "Potential Violations" or areas of concern.



## Coogle, Deon

---

**From:** Microsoft Exchange  
**To:** 'thagan@howcousa.com'; 'leemorris@howcousa.com'  
**Sent:** Thursday, October 13, 2011 11:50 AM  
**Subject:** Relayed: HOWCO Environmental Services - Inspection Letter

**Delivery to these recipients or distribution lists is complete, but delivery notification was not sent by the destination:**

'thagan@howcousa.com'

'leemorris@howcousa.com'

**Subject:** HOWCO Environmental Services - Inspection Letter

---

Sent by Microsoft Exchange Server 2007

**Coogle, Deon**

---

**From:** Microsoft Exchange  
**To:** 'gquinn@pinellascounty.org'  
**Sent:** Thursday, October 13, 2011 11:50 AM  
**Subject:** Relayed: HOWCO Environmental Services - Inspection Letter

**Delivery to these recipients or distribution lists is complete, but delivery notification was not sent by the destination:**

'gquinn@pinellascounty.org'

**Subject:** HOWCO Environmental Services - Inspection Letter


---

Sent by Microsoft Exchange Server 2007

Memorandum

Environmental Protection

SOUTHWEST DISTRICT ENFORCEMENT COVER MEMO

TO:  James Dregne, Hazardous Waste Program Manager *dir*

FROM:  Kelly Honey, Environmental Specialist III

DATE: October 12, 2011

FILE NAME: HOWCO Environmental Services COUNTY: Pinellas

PROGRAM: Hazardous Waste PROJECT # N/A

TYPE OF DOCUMENT: Inspection Report and Cover Letter

REQUESTED ACTION: APPROVAL

DESCRIPTION OF VIOLATIONS:  
N/A

STATUS OF CORRECTIVE ACTIONS:  
N/A

STATUS OF PENALTY ASSESSMENT:  
N/A

PENALTY: ☒ Not Applicable

Amount: N/A

Costs & Expenses: N/A

Total: N/A

Secretary Approval ☒ Not required / Approved on \_\_\_\_\_

Attachments: Inspection Report and Cover Letter

## DOCUMENTS AND RECORDKEEPING

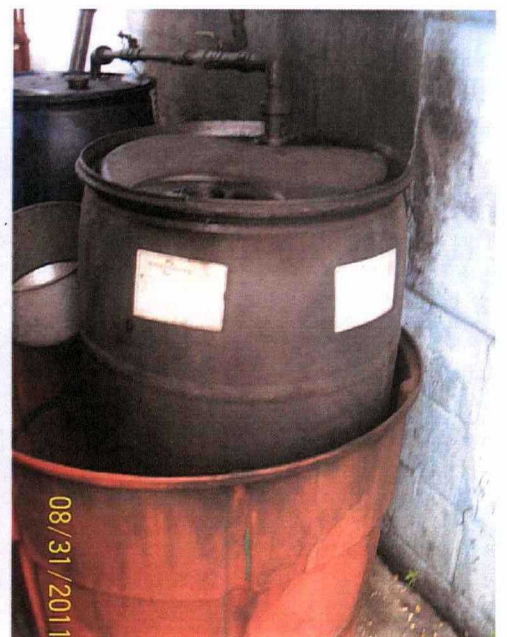
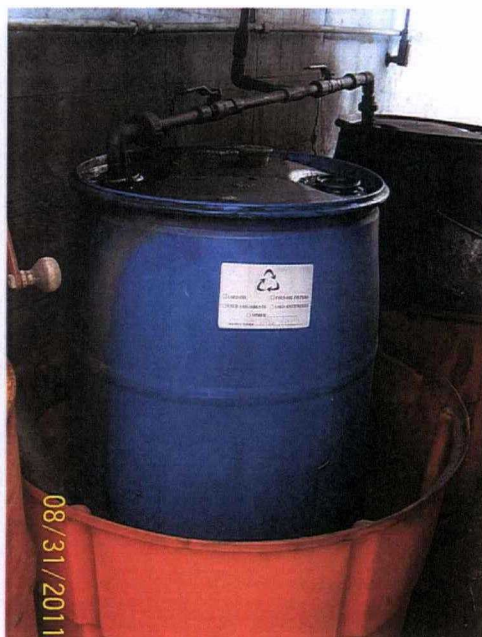
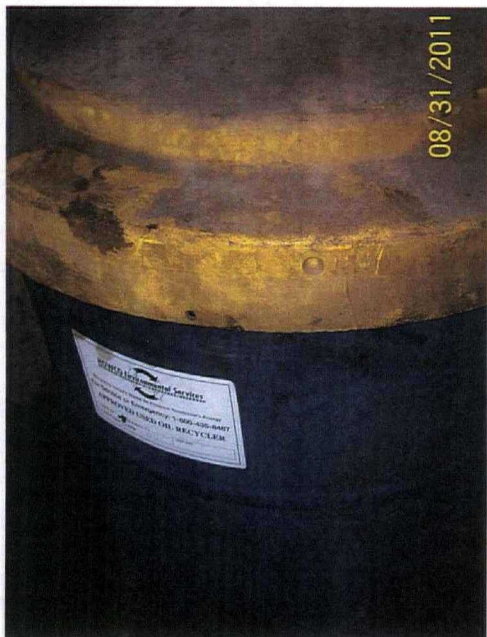
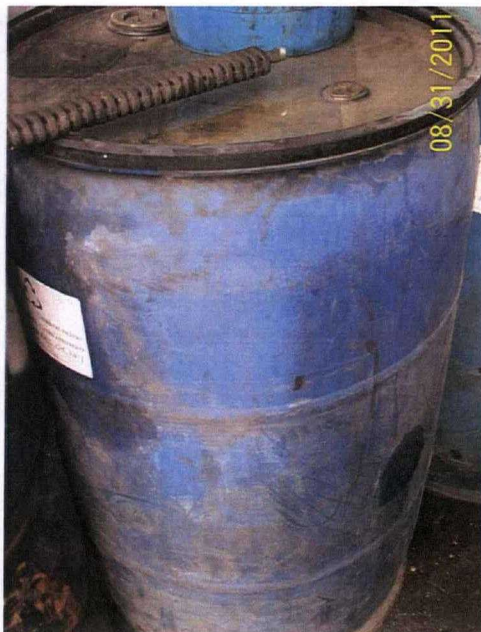
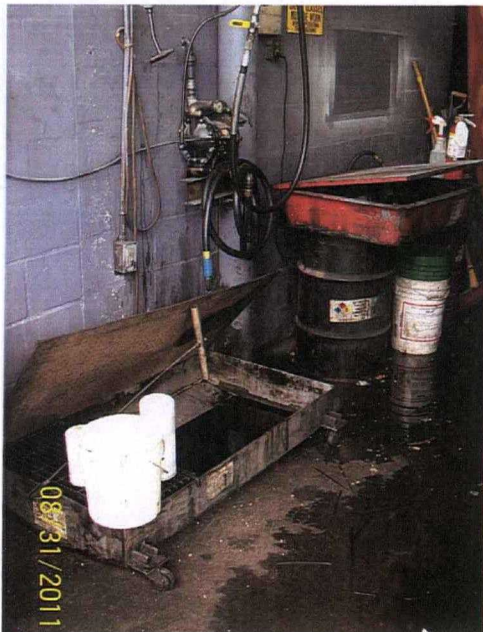
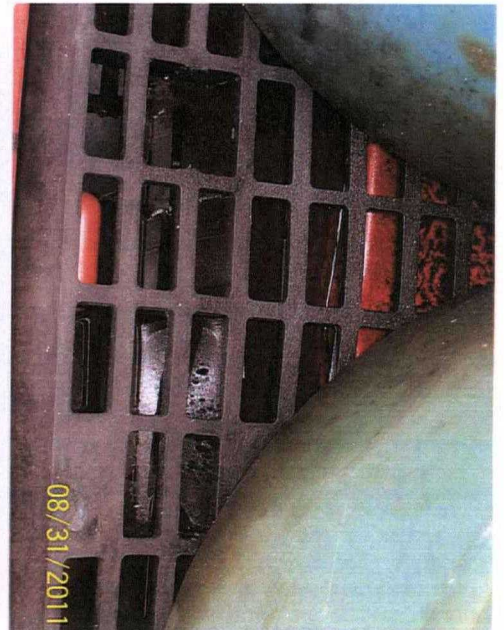
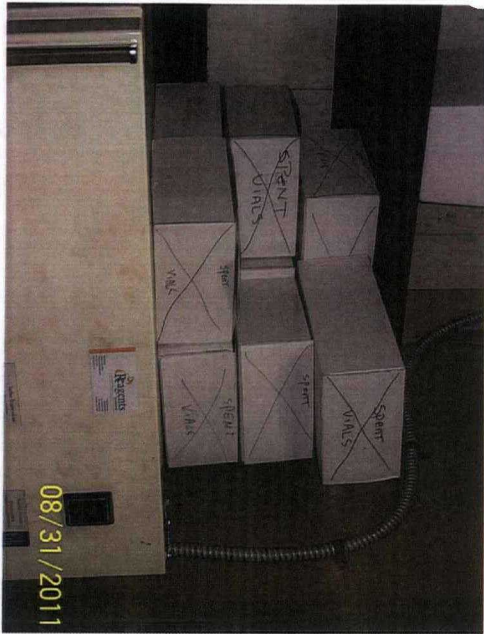
<input type="checkbox"/> Permit Application. <div style="text-align: center;">✓</div>	<input type="checkbox"/> Operating Permit. <div style="text-align: center;">✓ 6-2-11</div>
<input type="checkbox"/> Validated Annual Used Oil Registration [Form 62-701.900(13)]. <div style="text-align: center;">✓ 6-30-12</div>	<input type="checkbox"/> Annual Used Oil Recovery Report. <div style="text-align: center;">- 4,720,367 - G - UO 1,525,350 - UOF 4600 - G - OLO</div>
<input checked="" type="checkbox"/> Annual DEP Registration Placard For Storage Tanks. <div style="text-align: center;">6-30-12</div>	<input checked="" type="checkbox"/> Contingency Plan. <div style="text-align: center;">10-12-10</div>
<input checked="" type="checkbox"/> Training Logs. <div style="text-align: center;">MO</div>	<input checked="" type="checkbox"/> Closure Plan. <div style="text-align: center;">05-25-10</div>
<input type="checkbox"/> Results of Annual Waste Analyses For All Solid Waste Streams <i>Disposed</i> . <div style="text-align: center;">MO</div>	<input checked="" type="checkbox"/> Annual Closure Cost Update <div style="text-align: center;">1-11-11 - U.S.</div>
<input type="checkbox"/> Results of Annual Waste Analyses For All Solid Waste Streams <i>Received</i> From Generators. <div style="text-align: center;">MO</div>	<input checked="" type="checkbox"/> Transporter Liability Insurance [\$100,000 minimum]. <div style="text-align: center;">1,000,000</div>
<input checked="" type="checkbox"/> Processed Oil Sampling Logs [Minimum Of One Sample Every Two Weeks]. <div style="text-align: center;">to Phas lab</div>	<input checked="" type="checkbox"/> Monthly Inspection Logs Of The Solids Storage and Sludge Separation Areas.
<input checked="" type="checkbox"/> Tank Inspections and Monthly Release Detection Monitoring.	<input checked="" type="checkbox"/> Annual Analyses Of WWT and OES Sludges <div style="text-align: center;">06-09-11 0.47 m/L WWT - 0.87 m/L</div>
<input checked="" type="checkbox"/> Analysis Of Vibrascreen Filter Solids and Tank Bottom Sludges [Unless Processed In Tanks 110 or 111].	<input type="checkbox"/> Generator Non-Haz Demonstration For Used Antifreeze - N/A now recycled
<input type="checkbox"/> Documentation Of Annual Closure Cost Estimate [Solid Waste Processing] - N/A <div style="text-align: center;">Now part of UOP closing costs estimate</div>	<input type="checkbox"/> Records Of Refused Used Oil Shipments <div style="text-align: center;">just don't accept</div>
<input checked="" type="checkbox"/> Records Of Quantities Of Waste Received, Stored, Processed and Disposed. <div style="text-align: center;">07/10/06/11;</div>	<input checked="" type="checkbox"/> Documentation Of Annual Financial Assurance [Solid Waste Processing] - N/A <div style="text-align: center;">01-21-11</div>
<input type="checkbox"/> Records Of Disposal Or Treatment Facility For All Solid Wastes Removed [Name and Location]. <div style="text-align: center;">?</div>	<input type="checkbox"/> Quarterly Submittals Of Material Balance Of Quantities Of Solid Waste. - N/A
<input type="checkbox"/> Copies Of Permits For Facilities Receiving Processed Wastes. <div style="text-align: center;">?</div>	<input checked="" type="checkbox"/> Monthly Solid Waste Inspection / Corrective Actions Logs.
<input checked="" type="checkbox"/> Monthly Inspection Logs Of Safety and Emergency Equipment. <div style="text-align: center;">+ 100 weekly</div>	<input checked="" type="checkbox"/> Manifests / Bill-Of-Lading. <div style="text-align: center;">MO</div>
<div style="text-align: center;">CHECK to see if CESQG status</div>	

Inserted into OCULUS

OCT 19 2011

Initials: 1008





HOWCO Environmental Services (FLD 152 764 767); 08-31-11 - Photos by Kelly Honey, ES III

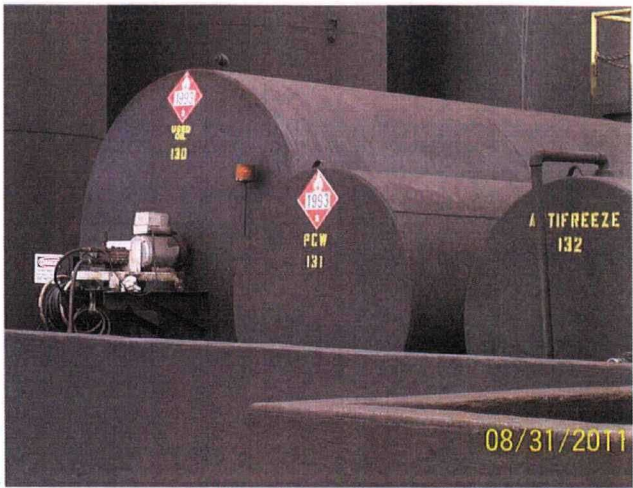
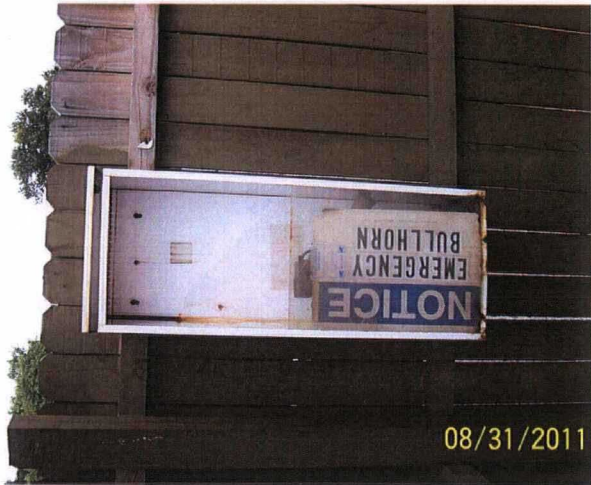












Inserted into OCULUS

OCT 19 2011

Initials: KA





Dept. of Environmental Protection  
FEB 14 2011  
Southwest District

February 11, 2011

Used Oil Coordinator, MS4555  
Department of Environmental Protection  
2600 Blair Stone Rd.  
Tallahassee, FL 32399-2400

To whom it may concern:

This letter is intended to respond to HOWCO Environmental Services' requirement to file an annual report on PCW activity by the company. The PCW is accumulated and processed at our St. Petersburg facility. Our process is thermal and therefore recovers the majority if not all product present in PCW streams collected and brought to our facility.

For calendar year 2010 HOWCO Environmental Services collected about **14,000 gallons of PCW**. HOWCO recovered approximately **700 gallons of product** that was blended into our #5 fuel oil.

We trust that this letter will answer any questions regarding PCW activity by HOWCO Environmental Services. If we can be of further assistance please do not hesitate to contact us at (727) 437-4059.

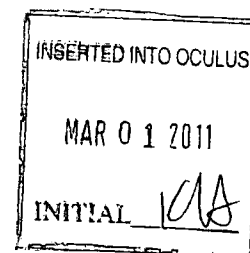
Sincerely,

Richard Dillen  
Quality Assurance Officer  
HOWCO Environmental

Cc: Mr. Jim Dregne, FDEP-Tampa  
File

3701 Central Avenue - St. Petersburg, FL 33713 - Tel. 727-327-8467 Fax: 727-321-6213

Operations: Tampa Bay - Ft. Myers - 24-Hour Emergency Access 1-800-435-8467





Florida Department of  
Environmental Protection  
Southwest District Office  
13051 North Telecom Parkway  
Temple Terrace, Florida 33637-0926

Charlie Crist  
Governor

Jeff Kottkamp  
Lt. Governor

Mimi Drew  
Secretary

November 10, 2010

Mr. Lee Morris  
Director of Operations  
HOWCO Environmental Services  
3701 Central Avenue  
St. Petersburg, FL 33713

**RE: HOWCO Environmental Services  
FLD 152 764 767  
Pinellas County  
OGC Case #10-2712**

Dear Mr. Morris:

Enclosed within, please find the executed Short Form Consent Order #10-2712 regarding the above referenced facility. The Department of Environmental Protection (Department) expects submission of the first payment of \$700.00 no later than November 27, 2010, as specified in the Order.

Should you have any questions, please direct them to me at (813) 632-7600, extension 369.

Sincerely,

Kelly Honey  
Environmental Specialist III  
Division of Waste Management

/kmh

enclosure

cc: Parves Mallick, US EPA Region IV  
Lea Crandall, Department, Office of General Counsel  
Glen Perrigan, Department, HWR Section  
Gene Quinn, Pinellas County SQG Program  
Compliance File



Florida Department of  
Environmental Protection  
Southwest District Office  
13051 North Telecom Parkway  
Temple Terrace, Florida 33637-0926

Charlie Crist  
Governor

Jeff Kottkamp  
Lt. Governor

Mimi Drew  
Secretary

October 4, 2010

**CERTIFIED MAIL 7009 1680 0001 0455 3034**  
**RETURN RECEIPT REQUESTED**

Dept. Of Environmental Protection  
NOV 08 2010  
Southwest District

Mr. Lee Morris, Director of Operations  
Hagan Holding Company  
d/b/a HOWCO Environmental Services  
3701 Central Avenue  
St. Petersburg, FL 33713

**SUBJECT: Proposed Settlement of HOWCO Environmental Services**  
**EPA ID #FLD 152 764 767**  
**OGC File No.: 10-2712**

Dear Mr. Morris:

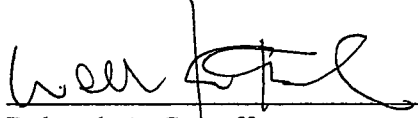
The purpose of this letter is to complete the resolution of the matter previously identified by the Department in the Warning Letter dated August 12, 2010, a copy of which is attached. The corrective actions required to bring your facility into compliance have been performed. The Department finds that 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 \$2,500.00, along with \$300.00 to reimburse Department costs, for a total of \$2,800.00. The civil penalty in this case does not include any violations of \$2,000.00 or more.

The Department acknowledges that the payment of these civil penalties by you does not constitute an admission of liability. The payment shall be made in four, equal payments of \$700.00, with the first payment due within thirty (30) days of your signing this letter. The remaining three payments shall be due quarterly thereafter. Final payment is due no later than August 8, 2011. Failure to timely make any installment payment will allow the Department, at its discretion, to accelerate the balance which will become immediately due. Payments 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." Payments shall be sent to the Department of Environmental Protection, 13051 North Telecom Parkway, Temple Terrace, FL 33637-0926.

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 and the attachments 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.

If you do not sign and return this letter to the Department at the District address within 15 days of receipt, 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,

  
for Deborah A. Getzoff  
District Director  
Southwest District

**FOR THE RESPONDENT:**

I, Arthur T. Hagan, on behalf of Hagan Holding Company d/b/a HOWCO Environmental Services, **HEREBY ACCEPT THE TERMS OF THE SETTLEMENT OFFER IDENTIFIED ABOVE.**

By:   
Arthur T. Hagan/ President

Date: 10-28-10

.....  
**FOR DEPARTMENT USE ONLY**

DONE AND ENTERED this 10th day of November, 2010.

STATE OF FLORIDA DEPARTMENT  
OF ENVIRONMENTAL PROTECTION

  
for Deborah A. Getzoff  
District Director

**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 Brantly 11/10/2010  
Clerk Date

Copies furnished to: Lea Crandall, Department, OGC

## 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.



# Florida Department of Environmental Protection

Southwest District Office  
13051 North Telecom Parkway  
Temple Terrace, Florida 33637-0926

Charlie Crist  
Governor

Jeff Kottkamp  
Lt. Governor

Michael W. Sole  
Secretary

August 12, 2010

**CERTIFIED MAIL 7009 1680 0001 0455 2884**  
**RETURN RECEIPT REQUESTED**

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

RE: **Warning Letter #WL10-0052HW52SWD**  
HOWCO Environmental Services  
EPA ID #FLD 152 764 767  
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 June 24, 2010, indicates that violations of Florida Statutes and Rules may exist at the above referenced facility. Department of Environmental Protection (Department) personnel made observations described in the attached inspection report. The report lists a summary of alleged violations of Department Rules.

Sections 403.161 and 403.727, Florida Statutes (F.S.) provide 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 Kelly Honey at (813) 632-7600, extension 369, 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(5), F.S. If after further investigation the

Inserted Into Oculus

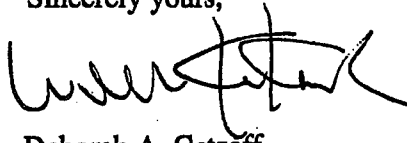
AUG 12 2010

Initials: 

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 and the Department's Civil Penalty Policies, the penalties which would be assessed in this case are \$2,500.00. Costs and expenses in this case will be a minimum of \$300.00.

If this investigation confirms that your facility is significantly out of compliance, and the case is not resolved through timely entry of a Consent Order, under the Department's agreement with the EPA, a formal referral for judicial action must be made to the Department's Office of General Counsel. We look forward to your cooperation in completing the investigation and resolution of this matter.

Sincerely yours,

  
Deborah A. Getzoff  
District Director  
Southwest District

DAG/kmh

enclosure

cc: Alan A. Annicella, US EPA Region IV (via electronic mail)  
Glen Perrigan, Department, HWR Section (via electronic mail)  
Gene Quinn, Pinellas County SQG Program (via electronic mail)  
Compliance File



Florida Department of  
Environmental Protection  
Hazardous Waste Inspection Report

**FACILITY INFORMATION:**

Facility Name: HOWCO Environmental Services  
On-Site Inspection Start Date: 06/24/2010 On-Site Inspection End Date: 06/24/2010  
ME ID#: 1038 EPA ID#: FLD152764767  
Facility Street Address: 843 43rd St S, St Petersburg, Florida 33711-1922  
Contact Mailing Address: 843 43rd St S, St Petersburg, Florida 33711-1922  
County Name: Pinellas Contact Phone: (727) 327-8467

**NOTIFIED AS:**

Non-Handler  
Used Oil

**INSPECTION TYPE:**

Routine Inspection for Used Oil Processor facility  
Routine Inspection for Used Oil Marketer facility  
Routine Inspection for Used Oil Transporter facility  
Routine Inspection for Used Oil Generator facility  
Routine Inspection for Used Oil Transfer Facility  
Routine Inspection for CESQG (<100 kg/month) facility

**INSPECTION PARTICIPANTS:**

Principal Inspector: Kelly M. Honey, Environmental Specialist III  
Other Participants: Shannon Camp, Environmental Specialist II; Lee Morris, Director of Operations;  
Richard Dillen, Quality Assurance Officer

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

**SIC CODE:** 2911 - Manufacturing - petroleum refining

**TYPE OF OWNERSHIP:** Private

**Introduction:**

HOWCO Environmental Services (HOWCO) was inspected by the Department of Environmental Protection (Department) to evaluate the facility's compliance with state and federal hazardous waste regulations. The inspectors were accompanied throughout by Richard Dillen, who manages the Laboratory, and Lee Morris, who manages the Yard. In the past ten years, the facility has been inspected by the Department eight times, most recently on April 23, 2009. HOWCO has a used oil processing permit issued by the Department on July 7, 2007. This permit expires on August 3, 2010. HOWCO submitted its permit renewal application on June 8, 2010.

**Process Description:**

HOWCO stores, processes and markets used oil and is a registered used oil filter transporter and processor, as well. Additionally, HOWCO accepts oily waste solids which are processed and solidified prior to disposal. As a result of the lab wastes generated during QA testing, HOWCO is also a conditionally exempt small quantity generator of hazardous waste (CESQG). At the plant, there are currently five employees, plus two recovery truck drivers and one tanker trailer driver. The facility is on City of St. Petersburg water and sewer systems. The processes at the facility have not changed since the previous inspection.

Since the previous inspection, HOWCO has replaced all its underground piping with aboveground



Inspection Date: 06/24/2010

pipng, in accordance with Chapter 62-762, FAC. Additionally, the yard has been resurfaced. The majority of old equipment that used to be in the "bone yard" has also been removed. The overall appearance of the yard was relatively tidy. In the tank farm, it was noted that two of the ASTs (#134 and #133) had open access ports on top. during the inspection, HOWCO staff were directed to replace the port plugs.

One of the facility's bullhorns was tested and found to be operable. The fire and emergency equipment are inspected monthly and tested annually. HazMat supplies are stored in one of three large trailers on the south side of the property. The contents of the HazMat trailer included personal protective equipment as well as spill control equipment. During the inventory of the trailer, it was determined that some of the equipment referenced on HOWCO's inventory list were missing, including two drums and four bags of absorbent. It was noted that these materials were at the facility, but not in the designated trailer. These materials have since been replaced. In the past, the Department has allowed HOWCO to keep its list of emergency equipment in the trailer, however, in accordance with 40 CFR 279.52(b)(2)(v), HOWCO must include this list in its contingency plan.

At the time of the inspection, there was one properly labeled 20 cubic yard roll-off of oily waste. At the rear of the solid waste pad were two aboveground storage tanks (ASTs) that were labeled used oil. These ASTs were open. Staff indicated that these ASTs were probably returned from customers. Near the drum washing area, there were approximately 25 drums to be cleaned. Some of the drums were not closed or the lids were cracked allowing rainwater to enter the drums and mix with the oil residue inside. In future, HOWCO should ensure that these drums are protected from the weather. In the oily waste staging area, there were approximately 39 drums of grease, oily sorbent material, asphalt, recovered diesel fuel and paper filters. There was also one unlabeled drum of used oil filters. In the used oil filter processing area, there were approximately 100 drums of used oil filters in storage. One of these drums was not labeled. The crusher was equipped with a small pan to collect leaking hydraulic oil. This pan was also not labeled. All these containers were labeled during the inspection, and staff were directed to replace the plugs in the open ASTs. Crushed used oil filters are shipped to a smelter. Used oil collected in the crushing unit is transferred to tank #109.

Solid waste managed at the facility includes oily solid waste generated by HOWCO and its customers. Solid waste streams received are analyzed at least once every five years in accordance with the permit. The WTU sludge and the oil-extracted sludge generated at the facility is to be analyzed annually. The sludge was sampled on April 23, 2009, and again on July 14, 2010, and results indicate that both wastestreams are nonhazardous. Solid waste is either sent to a landfill or to the incinerator. HOWCO is under both its 40,000-gallon limit for sending received solid wastes to a landfill and its 200,000-gallon limit for sending received solid wastes to an energy recovery facility.

The Maintenance Shop generates used oil filters, used oil, used antifreeze and oily waste. There is also a 25-gallon parts washer in use. Spent solvent from the parts washer is disposed of with the shop's used oil. Used oil and antifreeze containers are equipped with secondary containment. During the inspection, it was noted that the container labeled "used antifreeze" actually contained used oil. There were also two, partially full aerosol cans observed in the trash. Aerosol cans that are not empty are hazardous waste. HOWCO needs to review proper hazardous waste management with applicable staff to prevent this from occurring again. In the room next to the Maintenance Shop, there was one spent lamp observed without a box or label. This has since been corrected. Batteries are returned to the vendor for core credit.

In the area next to the Maintenance Shop, there were two full drums labeled "used oil" without containment. After the inspection, the drums were moved across the street to the plant and processed. Also in this area were six 5-gallon containers of waste, some of which appeared were open and in poor shape, especially around the openings. The containers were on a containment pallet covered with a piece of plywood and appeared to have been forgotten. Some of the containers were labeled "dirty lacquer thinner," and some were not labeled and appeared to be old product containers. This is a violation of specific permit condition I.14.(a). After investigating the source of the containers, HOWCO determined that the material was from facility maintenance

Inspection Date: 06/24/2010

activities several years ago. It appears that the dirty thinner was generated during the job, and the old products were determined to be unusable a couple of years later. Since the inspection, the contents of the containers were transferred to a drum and are awaiting disposal as hazardous waste.

Behind the laboratory, there are two 55-gallon drums of used oil in secondary containment. The drums are covered and labeled. The drums collect sample waste from the laboratory. Processed oil is randomly sampled biweekly and tested to confirm it is on-spec. Metal analyses are done off site by PhosLab. Samples of processed oil are retained in the laboratory for thirty days. Hazardous COD testing waste is generated in the laboratory, and spent vials are accumulated in a box labeled "spent vials." Staff said fluorescent lamps are taken on CESQG days to the County collection center for disposal, which is also how laboratory wastes are disposed of. Hazardous wastes have not been disposed of since the last inspection.

Records were reviewed and found to be complete and up to date with the following exception. It was noted that the contingency plan originally approved in the permit application does not contain the home addresses of the emergency coordinators. In accordance with 40 CFR 279.52(b)(2)(iv), the plan must list names, addresses, and phone numbers (office and home) of all persons qualified to act as emergency coordinator. Ensure that this information is added to the plan. Most HOWCO employees, including all the designated emergency coordinators, attended a Used Oil Management Workshop on 12-05-09, and all HOWCO drivers also attended the associated Driver Training Class.

**New Potential Violations and Areas of Concern:****Checklist Independent Potential Violations and Areas of Concern**

Type: Violation

Rule: 62-710.401(6), 279.54(c)

Explanation: At the time of the inspection, there were two drums of used oil without secondary containment behind the vehicle maintenance area. (corrected)

Corrective Action: Subsequent to the inspection the facility moved the drums of used oil across the street and processed the used oil.

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Type: Violation

Rule: 273.14(e), 273.13(d)(1)

Explanation: At the time of the inspection, there was one spent fluorescent lamp in the vehicle maintenance area that was not labeled or in a container. (corrected)

Corrective Action: After the inspection, the spent lamp was placed into a closed and properly labeled container.

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Type: Area Of Concern

Rule: 62-710.401(6)

Explanation: In the drum washing area and next to the drum washing area, there were several staged drums that did not have properly fitting lids or had open bung holes. These drums contained rainwater and used oil, technically making them subject to used oil container management requirements, such as labeling.

Corrective Action: As discussed during the inspection, drums with used oil residue should be protected from the weather to keep them from filling with rainwater while staged.

Inspection Date: 06/24/2010

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**Type:** Violation**Rule:** 279.52(b)(2)(v)**Explanation:** The equipment list provided in the plan does not include an up to date list of emergency equipment at the facility, and the list maintained in the HazMat / emergency response trailer did not match the equipment available at the time of the inspection. Specifically, there were two empty drums and four bags of absorbent material missing from the trailer. (corrected)**Corrective Action:** After the inspection, the missing items in the trailer were replaced. Note that a copy of this list must be included in the contingency plan as required by Rule.

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**Type:** Area Of Concern**Rule:** 279.52(b)(2)(iv)**Explanation:** The home addresses of the designated emergency coordinators is not provided in the contingency plan.**Corrective Action:** By Rule, the contingency plan must include the home addresses and phone numbers of the emergency coordinators. This information must be added to the plan immediately.

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**Type:** Violation**Rule:** 279.54(f)(1)**Explanation:** At the time of the inspection, there was an unlabeled pan of used oil under the filter crusher and a drum of used oil next to the vehicle maintenance area that was labeled "used antifreeze." (corrected)**Corrective Action:** The catch pan and the drum were both correctly labeled during the inspection.

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**Type:** Area Of Concern**Rule:** 261.5(g)(3)(iii)**Explanation:** At the time of the inspection, there were two partially full aerosol cans (D001) observed in the trash in the vehicle maintenance area. (corrected)**Corrective Action:** During the inspection, the aerosol cans were removed from the trash and put aside for proper disposal as hazardous waste.

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**Type:** Violation**Rule:** 279.52(a)(1)**Explanation:** At the time of the inspection, there were six 5-gallon containers of paint related wastes on a pallet next to the vehicle maintenance area. Some of the containers were in deteriorating condition and appeared to have been forgotten. This is a violation of specific permit condition I.14.(a). (corrected)**Corrective Action:** After the inspection, the facility transferred the contents of the six containers into a 55-gallon drum. Arrangements are being made to have the waste picked up and disposed of as hazardous.

Inspection Date: 06/24/2010

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**Type:** Violation**Rule:** 62-710.850(5)(a)**Explanation:** There were two drums of used oil filters that were not labeled. (corrected)**Corrective Action:** The drums of used oil filters were labeled during the inspection.

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**Type:** Violation**Rule:** 62-710.401(6)**Explanation:** Also observed during the inspection were two ASTs in the solid waste processing area with open access ports. ASTs #133 and #134 also had open access ports. (corrected)**Corrective Action:** During the inspection, facility staff were directed to obtain plugs for the openings in all four ASTs.

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**Summary of Potential Violations and Areas of Concern:****Potential Violations**

Rule Number	Area	Date Cited	Explanation
Checklist Independent Violations			
62-710.401(6), 279.54(c)		06/24/2010	At the time of the inspection, there were two drums of used oil without secondary containment behind the vehicle maintenance area. (corrected)
273.14(e), 273.13(d)(1)		06/24/2010	At the time of the inspection, there was one spent fluorescent lamp in the vehicle maintenance area that was not labeled or in a container. (corrected)
279.52(b)(2)(v)		06/24/2010	The equipment list provided in the plan does not include an up to date list of emergency equipment at the facility, and the list maintained in the HazMat / emergency response trailer did not match the equipment available at the time of the inspection. Specifically, there were two empty drums and four bags of absorbent material missing from the trailer. (corrected)
279.54(f)(1)		06/24/2010	At the time of the inspection, there was an unlabeled pan of used oil under the filter crusher and a drum of used oil next to the vehicle maintenance area that was labeled "used antifreeze." (corrected)
279.52(a)(1)		06/24/2010	At the time of the inspection, there were six-5-gallon containers of paint related wastes on a pallet next to the vehicle maintenance area. Some of the containers were in deteriorating condition and appeared to have been forgotten. This is a violation of specific

Inspection Date: 06/24/2010

Rule Number	Area	Date Cited	Explanation
			permit condition I.14.(a). (corrected)
62-710.850(5)(a)		06/24/2010	There were two drums of used oil filters that were not labeled. (corrected)
62-710.401(6)		06/24/2010	Also observed during the inspection were two ASTs in the solid waste processing area with open access ports. ASTs #133 and #134 also had open access ports. (corrected)

Areas of Concern

Rule Number	Area	Date Cited	Explanation
Checklist Independent Areas of Concern			
62-710.401(6)		06/24/2010	In the drum washing area and next to the drum washing area, there were several staged drums that did not have properly fitting lids or had open bung holes. These drums contained rainwater and used oil, technically making them subject to used oil container management requirements, such as labeling.
279.52(b)(2)(iv)		06/24/2010	The home addresses of the designated emergency coordinators is not provided in the contingency plan.
261.5(g)(3)(iii)		06/24/2010	At the time of the inspection, there were two partially full aerosol cans (D001) observed in the trash in the vehicle maintenance area. (corrected)

**Conclusion:**

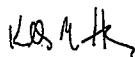
Based on the observations made during this inspection, HOWCO was not in compliance with its permit or rules governing used oil processors. The facility has since returned to compliance.

Inspection Date: 06/24/2010

**Signed:**

A hazardous waste compliance inspection was conducted on this date, to determine your facility's compliance with applicable portions of Chapters 403 & 376, F.S., and Chapters 62-710, 62-730, 62-737, & 62-740 Florida Administrative Code (F.A.C.). Portions of the United States Environmental Protection Agency's Title 40 Code of Federal Regulations (C.F.R.) 260 - 279 have been adopted by reference in the state rules under Chapters 62-730 and 62-710, F.A.C. The above noted potential items of non-compliance were identified by the inspector(s).

This is not a formal enforcement action and may not be a complete listing of all items of non-compliance discovered during the inspection.

Kelly M. Honey**PRINCIPAL INSPECTOR NAME**Environmental Specialist III**PRINCIPAL INSPECTOR TITLE****PRINCIPAL INSPECTOR SIGNATURE**FDEP**ORGANIZATION**8/12/2010**DATE**Shannon Camp**INSPECTOR NAME**Environmental Specialist II**INSPECTOR TITLE**NO SIGNATURE**INSPECTOR SIGNATURE**FDEP**ORGANIZATION**Lee Morris**REPRESENTATIVE NAME**Director of Operations**REPRESENTATIVE TITLE**NO SIGNATURE**REPRESENTATIVE SIGNATURE**HOWCO Environmental Services**ORGANIZATION**Richard Dillen**REPRESENTATIVE NAME**Quality Assurance Officer**REPRESENTATIVE TITLE**NO SIGNATURE**REPRESENTATIVE SIGNATURE**HOWCO Environmental Services**ORGANIZATION**

NOTE: By signing this document, the Site Representative only acknowledges receipt of this Inspection Report and is not admitting to the accuracy of any of the items identified by the Department as "Potential Violations" or areas of concern.

## Memorandum

## Environmental Protection

## SOUTHWEST DISTRICT ENFORCEMENT COVER MEMO

TO: \_\_\_\_\_ Deborah A. Getzoff, District Director

THROUGH: W William Kutash, Waste Program Administrator  
JD James Dregne, Hazardous Waste Program Manager 8/12  
EK Elizabeth Knauss, HW Enforcement Coordinator

FROM: KH Kelly Honey, Environmental Specialist III

DATE: August 11, 2010

FILE NAME: HOWCO Environmental Services

COUNTY: Pinellas

PROGRAM: Hazardous Waste

PROJECT # WL10-0052HW52SWD

TYPE OF DOCUMENT: Warning Letter  
Penalty Computation WorksheetREQUESTED ACTION: SIGNATURE

## DESCRIPTION OF VIOLATIONS:

The facility had several unit management violations, including two drums without containment, and also had some old, open containers of spent lacquer thinner.

## STATUS OF CORRECTIVE ACTIONS:

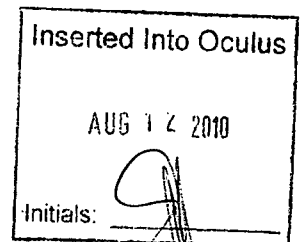
The facility has returned to compliance.

## STATUS OF PENALTY ASSESSMENT:

The penalty has been prepared in accordance with United States EPA RCRA Civil Penalty Policy.

PENALTY: ☐ Not ApplicableAmount: \$2,500Costs & Expenses: \$300Total: \$2,800Secretary Approval ☒ Not required / Approved on \_\_\_\_\_

Attachments: Warning Letter  
Penalty Computation Worksheet







# Florida Department of Environmental Protection

Southwest District Office  
13051 North Telecom Parkway  
Temple Terrace, Florida 33637-0926

Charlie Crist  
Governor

Jeff Kottkamp  
Lt. Governor

Michael W. Sole  
Secretary

August 12, 2010

**CERTIFIED MAIL 7009 1680 0001 0455 2884**  
**RETURN RECEIPT REQUESTED**

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

RE: **Warning Letter #WL10-0052HW52SWD**  
HOWCO Environmental Services  
EPA ID #FLD 152 764 767  
Pinellas County

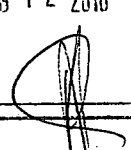
Dear Mr. Hagan:

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 June 24, 2010, indicates that violations of Florida Statutes and Rules may exist at the above referenced facility. Department of Environmental Protection (Department) personnel made observations described in the attached inspection report. The report lists a summary of alleged violations of Department Rules.

Sections 403.161 and 403.727, Florida Statutes (F.S.) provide 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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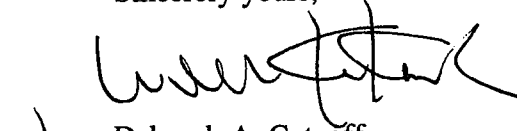
Please be advised that this Warning Letter is part of an agency investigation, preliminary to agency action in accordance with Section 120.57(5), F.S. If after further investigation the

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AUG 12 2010
Initials: 

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 and the Department's Civil Penalty Policies, the penalties which would be assessed in this case are \$2,500.00. Costs and expenses in this case will be a minimum of \$300.00.

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Sincerely yours,



Deborah A. Getzoff  
District Director  
Southwest District

DAG/kmh

enclosure

cc: Alan A. Annicella, US EPA Region IV (via electronic mail)  
Glen Perrigan, Department, HWR Section (via electronic mail)  
Gene Quinn, Pinellas County SQG Program (via electronic mail)  
Compliance File

## PENALTY COMPUTATION WORKSHEET

VIOLATOR'S NAME: HOWCO ENVIRONMENTAL SERVICES

IDENTIFY VIOLATOR'S FACILITY: 843 43<sup>RD</sup> ST., ST. PETERSBURG, FL (FLD 152 764 767)

NAME OF DEPARTMENT STAFF RESPONSIBLE FOR THE PENALTY COMPUTATIONS: KELLY HONEY

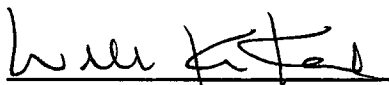
CASE #: WL10-0052HW52SWD

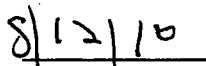
DATE: AUGUST 11, 2010

VIOLATION TYPE	MANUAL GUIDE	POTENTIAL FOR HARM	EXTENT OF DEVIATION	MATRIX RANGE	TOTAL
1. FAILURE TO MINIMIZE THE POSSIBILITY OF FIRE / EXPLOSION OR RELEASE OF HAZARDOUS CONSTITUENTS <b>40 CFR 279.52(a)(1)/Permit Condition I.14(a).</b>	UO-119	ELRA	ELRA	\$1,000	\$1,000
2. FAILURE TO MAINTAIN EMERGENCY EQUIPMENT AS SPECIFIED IN INVENTORY LIST <b>40 CFR 279.52(b)(2)(v)</b>	UO-112	ELRA	ELRA	\$1,000	NO PENALTY ASSESSED
3. FAILURE TO PROVIDE SECONDARY CONTAINMENT FOR TWO DRUMS OF USED OIL <b>40 CFR 279.54(c); 62-710.401(6), FAC</b>	UO-102	ELRA	ELRA	\$1,000	\$1,000
4. FAILURE TO LABEL ONE PAN AND ONE DRUM WITH THE WORDS "USED OIL" <b>40 CFR 279.54(f)(1)</b>	UO-147	ELRA	ELRA	\$500	\$500
5. FAILURE TO KEEP FOUR ASTs CLOSED OR OTHERWISE PROTECTED FROM THE WEATHER <b>40 CFR 279.56(a)(1)</b>	UO-145	ELRA	ELRA	\$500	COMBINED WITH ITEM 4
6. FAILURE TO LABEL TWO DRUMS OF USED OIL FILTERS WITH THE WORDS "USED OIL FILTERS" <b>62-710.850(5)(a), FAC</b>	UO-133	ELRA	ELRA	\$500	COMBINED WITH ITEM 4
SUB-TOTAL					\$2,500
DEPARTMENT COSTS					\$300

**TOTAL PENALTIES INCLUDING DEPARTMENT COSTS:**

**\$2,800**

  
 DEBORAH A. GETZOFF  
 DISTRICT DIRECTOR  
 SOUTHWEST DISTRICT

  
 DATE



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

---

**FACILITY INFORMATION:**

**Facility Name:** HOWCO Environmental Services  
**On-Site Inspection Start Date:** 06/24/2010      **On-Site Inspection End Date:** 06/24/2010  
**ME ID#:** 1038      **EPA ID#:** FLD152764767  
**Facility Street Address:** 843 43rd St S, St Petersburg, Florida 33711-1922  
**Contact Mailing Address:** 843 43rd St S, St Petersburg, Florida 33711-1922  
**County Name:** Pinellas      **Contact Phone:** (727) 327-8467

**NOTIFIED AS:**

Non-Handler  
Used Oil

**INSPECTION TYPE:**

Routine Inspection for Used Oil Processor facility  
Routine Inspection for Used Oil Marketer facility  
Routine Inspection for Used Oil Transporter facility  
Routine Inspection for Used Oil Generator facility  
Routine Inspection for Used Oil Transfer Facility  
Routine Inspection for CESQG (<100 kg/month) facility

**INSPECTION PARTICIPANTS:**

**Principal Inspector:** Kelly M. Honey, Environmental Specialist III  
**Other Participants:** Shannon Camp, Environmental Specialist II; Lee Morris, Director of Operations;  
Richard Dillen, Quality Assurance Officer

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

**SIC CODE:** 2911 - Manufacturing - petroleum refining

**TYPE OF OWNERSHIP:** Private

**Introduction:**

HOWCO Environmental Services (HOWCO) was inspected by the Department of Environmental Protection (Department) to evaluate the facility's compliance with state and federal hazardous waste regulations. The inspectors were accompanied throughout by Richard Dillen, who manages the Laboratory, and Lee Morris, who manages the Yard. In the past ten years, the facility has been inspected by the Department eight times, most recently on April 23, 2009. HOWCO has a used oil processing permit issued by the Department on July 7, 2007. This permit expires on August 3, 2010. HOWCO submitted its permit renewal application on June 8, 2010.

**Process Description:**

HOWCO stores, processes and markets used oil and is a registered used oil filter transporter and processor, as well. Additionally, HOWCO accepts oily waste solids which are processed and solidified prior to disposal. As a result of the lab wastes generated during QA testing, HOWCO is also a conditionally exempt small quantity generator of hazardous waste (CESQG). At the plant, there are currently five employees, plus two recovery truck drivers and one tanker trailer driver. The facility is on City of St. Petersburg water and sewer systems. The processes at the facility have not changed since the previous inspection.

Since the previous inspection, HOWCO has replaced all its underground piping with aboveground

Inspection Date: 06/24/2010

piping, in accordance with Chapter 62-762, FAC. Additionally, the yard has been resurfaced. The majority of old equipment that used to be in the "bone yard" has also been removed. The overall appearance of the yard was relatively tidy. In the tank farm, it was noted that two of the ASTs (#134 and #133) had open access ports on top. During the inspection, HOWCO staff were directed to replace the port plugs.

One of the facility's bullhorns was tested and found to be operable. The fire and emergency equipment are inspected monthly and tested annually. HazMat supplies are stored in one of three large trailers on the south side of the property. The contents of the HazMat trailer included personal protective equipment as well as spill control equipment. During the inventory of the trailer, it was determined that some of the equipment referenced on HOWCO's inventory list were missing, including two drums and four bags of absorbent. It was noted that these materials were at the facility, but not in the designated trailer. These materials have since been replaced. In the past, the Department has allowed HOWCO to keep its list of emergency equipment in the trailer, however, in accordance with 40 CFR 279.52(b)(2)(v), HOWCO must include this list in its contingency plan.

At the time of the inspection, there was one properly labeled 20 cubic yard roll-off of oily waste. At the rear of the solid waste pad were two aboveground storage tanks (ASTs) that were labeled used oil. These ASTs were open. Staff indicated that these ASTs were probably returned from customers. Near the drum washing area, there were approximately 25 drums to be cleaned. Some of the drums were not closed or the lids were cracked allowing rainwater to enter the drums and mix with the oil residue inside. In future, HOWCO should ensure that these drums are protected from the weather. In the oily waste staging area, there were approximately 39 drums of grease, oily sorbent material, asphalt, recovered diesel fuel and paper filters. There was also one unlabeled drum of used oil filters. In the used oil filter processing area, there were approximately 100 drums of used oil filters in storage. One of these drums was not labeled. The crusher was equipped with a small pan to collect leaking hydraulic oil. This pan was also not labeled. All these containers were labeled during the inspection, and staff were directed to replace the plugs in the open ASTs. Crushed used oil filters are shipped to a smelter. Used oil collected in the crushing unit is transferred to tank #109.

Solid waste managed at the facility includes oily solid waste generated by HOWCO and its customers. Solid waste streams received are analyzed at least once every five years in accordance with the permit. The WTU sludge and the oil-extracted sludge generated at the facility is to be analyzed annually. The sludge was sampled on April 23, 2009, and again on July 14, 2010, and results indicate that both wastestreams are nonhazardous. Solid waste is either sent to a landfill or to the incinerator. HOWCO is under both its 40,000-gallon limit for sending received solid wastes to a landfill and its 200,000-gallon limit for sending received solid wastes to an energy recovery facility.

The Maintenance Shop generates used oil filters, used oil, used antifreeze and oily waste. There is also a 25-gallon parts washer in use. Spent solvent from the parts washer is disposed of with the shop's used oil. Used oil and antifreeze containers are equipped with secondary containment. During the inspection, it was noted that the container labeled "used antifreeze" actually contained used oil. There were also two, partially full aerosol cans observed in the trash. Aerosol cans that are not empty are hazardous waste. HOWCO needs to review proper hazardous waste management with applicable staff to prevent this from occurring again. In the room next to the Maintenance Shop, there was one spent lamp observed without a box or label. This has since been corrected. Batteries are returned to the vendor for core credit.

In the area next to the Maintenance Shop, there were two full drums labeled "used oil" without containment. After the inspection, the drums were moved across the street to the plant and processed. Also in this area were six 5-gallon containers of waste, some of which appeared were open and in poor shape, especially around the openings. The containers were on a containment pallet covered with a piece of plywood and appeared to have been forgotten. Some of the containers were labeled "dirty lacquer thinner," and some were not labeled and appeared to be old product containers. This is a violation of specific permit condition I.14.(a). After investigating the source of the containers, HOWCO determined that the material was from facility maintenance

Inspection Date: 06/24/2010

activities several years ago. It appears that the dirty thinner was generated during the job, and the old products were determined to be unusable a couple of years later. Since the inspection, the contents of the containers were transferred to a drum and are awaiting disposal as hazardous waste.

Behind the laboratory, there are two 55-gallon drums of used oil in secondary containment. The drums are covered and labeled. The drums collect sample waste from the laboratory. Processed oil is randomly sampled biweekly and tested to confirm it is on-spec. Metal analyses are done off site by PhosLab. Samples of processed oil are retained in the laboratory for thirty days. Hazardous COD testing waste is generated in the laboratory, and spent vials are accumulated in a box labeled "spent vials." Staff said fluorescent lamps are taken on CESQG days to the County collection center for disposal, which is also how laboratory wastes are disposed of. Hazardous wastes have not been disposed of since the last inspection.

Records were reviewed and found to be complete and up to date with the following exception. It was noted that the contingency plan originally approved in the permit application does not contain the home addresses of the emergency coordinators. In accordance with 40 CFR 279.52(b)(2)(iv), the plan must list names, addresses, and phone numbers (office and home) of all persons qualified to act as emergency coordinator. Ensure that this information is added to the plan. Most HOWCO employees, including all the designated emergency coordinators, attended a Used Oil Management Workshop on 12-05-09, and all HOWCO drivers also attended the associated Driver Training Class.

#### New Potential Violations and Areas of Concern:

##### Checklist Independent Potential Violations and Areas of Concern

Type:	Violation
Rule:	62-710.401(6), 279.54(c)
Explanation:	At the time of the inspection, there were two drums of used oil without secondary containment behind the vehicle maintenance area. (corrected)
Corrective Action:	Subsequent to the inspection the facility moved the drums of used oil across the street and processed the used oil.

---

Type:	Violation
Rule:	273.14(e), 273.13(d)(1)
Explanation:	At the time of the inspection, there was one spent fluorescent lamp in the vehicle maintenance area that was not labeled or in a container. (corrected)
Corrective Action:	After the inspection, the spent lamp was placed into a closed and properly labeled container.

---

Type:	Area Of Concern
Rule:	62-710.401(6)
Explanation:	In the drum washing area and next to the drum washing area, there were several staged drums that did not have properly fitting lids or had open bung holes. These drums contained rainwater and used oil, technically making them subject to used oil container management requirements, such as labeling.
Corrective Action:	As discussed during the inspection, drums with used oil residue should be protected from the weather to keep them from filling with rainwater while staged.

Inspection Date: 06/24/2010

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Type: Violation  
Rule: 279.52(b)(2)(v)  
Explanation: The equipment list provided in the plan does not include an up to date list of emergency equipment at the facility, and the list maintained in the HazMat / emergency response trailer did not match the equipment available at the time of the inspection. Specifically, there were two empty drums and four bags of absorbent material missing from the trailer. (corrected)  
Corrective Action: After the inspection, the missing items in the trailer were replaced. Note that a copy of this list must be included in the contingency plan as required by Rule.

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Type: Area Of Concern  
Rule: 279.52(b)(2)(iv)  
Explanation: The home addresses of the designated emergency coordinators is not provided in the contingency plan.  
Corrective Action: By Rule, the contingency plan must include the home addresses and phone numbers of the emergency coordinators. This information must be added to the plan immediately.

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Type: Violation  
Rule: 279.54(f)(1)  
Explanation: At the time of the inspection, there was an unlabeled pan of used oil under the filter crusher and a drum of used oil next to the vehicle maintenance area that was labeled "used antifreeze." (corrected)  
Corrective Action: The catch pan and the drum were both correctly labeled during the inspection.

---

Type: Area Of Concern  
Rule: 261.5(g)(3)(iii)  
Explanation: At the time of the inspection, there were two partially full aerosol cans (D001) observed in the trash in the vehicle maintenance area. (corrected)  
Corrective Action: During the inspection, the aerosol cans were removed from the trash and put aside for proper disposal as hazardous waste.

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Type: Violation  
Rule: 279.52(a)(1)  
Explanation: At the time of the inspection, there were six 5-gallon containers of paint related wastes on a pallet next to the vehicle maintenance area. Some of the containers were in deteriorating condition and appeared to have been forgotten. This is a violation of specific permit condition I.14.(a). (corrected)  
Corrective Action: After the inspection, the facility transferred the contents of the six containers into a 55-gallon drum. Arrangements are being made to have the waste picked up and disposed of as hazardous.



Inspection Date: 06/24/2010

Type: Violation

Rule: 62-710.850(5)(a)

Explanation: There were two drums of used oil filters that were not labeled. (corrected)

Corrective Action: The drums of used oil filters were labeled during the inspection.

Type: Violation

Rule: 62-710.401(6)

Explanation: Also observed during the inspection were two ASTs in the solid waste processing area with open access ports. ASTs #133 and #134 also had open access ports. (corrected)

Corrective Action: During the inspection, facility staff were directed to obtain plugs for the openings in all four ASTs.

**Summary of Potential Violations and Areas of Concern:**Potential Violations

Rule Number	Area	Date Cited	Explanation
Checklist Independent Violations			
62-710.401(6), 279.54(c)		06/24/2010	At the time of the inspection, there were two drums of used oil without secondary containment behind the vehicle maintenance area. (corrected)
273.14(e), 273.13(d)(1)		06/24/2010	At the time of the inspection, there was one spent fluorescent lamp in the vehicle maintenance area that was not labeled or in a container. (corrected)
279.52(b)(2)(v)		06/24/2010	The equipment list provided in the plan does not include an up to date list of emergency equipment at the facility, and the list maintained in the HazMat / emergency response trailer did not match the equipment available at the time of the inspection. Specifically, there were two empty drums and four bags of absorbent material missing from the trailer. (corrected)
279.54(f)(1)		06/24/2010	At the time of the inspection, there was an unlabeled pan of used oil under the filter crusher and a drum of used oil next to the vehicle maintenance area that was labeled "used antifreeze." (corrected)
279.52(a)(1)		06/24/2010	At the time of the inspection, there were six-5-gallon containers of paint related wastes on a pallet next to the vehicle maintenance area. Some of the containers were in deteriorating condition and appeared to have been forgotten. This is a violation of specific

Inspection Date: 06/24/2010

Rule Number	Area	Date Cited	Explanation
			permit condition I.14.(a). (corrected)
62-710.850(5)(a)		06/24/2010	There were two drums of used oil filters that were not labeled. (corrected)
62-710.401(6)		06/24/2010	Also observed during the inspection were two ASTs in the solid waste processing area with open access ports. ASTs #133 and #134 also had open access ports. (corrected)

Areas of Concern

Rule Number	Area	Date Cited	Explanation
Checklist Independent Areas of Concern			
62-710.401(6)		06/24/2010	In the drum washing area and next to the drum washing area, there were several staged drums that did not have properly fitting lids or had open bung holes. These drums contained rainwater and used oil, technically making them subject to used oil container management requirements, such as labeling.
279.52(b)(2)(iv)		06/24/2010	The home addresses of the designated emergency coordinators is not provided in the contingency plan.
261.5(g)(3)(iii)		06/24/2010	At the time of the inspection, there were two partially full aerosol cans (D001) observed in the trash in the vehicle maintenance area. (corrected)

**Conclusion:**

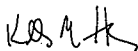
Based on the observations made during this inspection, HOWCO was not in compliance with its permit or rules governing used oil processors. The facility has since returned to compliance.

Inspection Date: 06/24/2010

**Signed:**

A hazardous waste compliance inspection was conducted on this date, to determine your facility's compliance with applicable portions of Chapters 403 & 376, F.S., and Chapters 62-710, 62-730, 62-737, & 62-740 Florida Administrative Code (F.A.C.). Portions of the United States Environmental Protection Agency's Title 40 Code of Federal Regulations (C.F.R.) 260 - 279 have been adopted by reference in the state rules under Chapters 62-730 and 62-710, F.A.C. The above noted potential items of non-compliance were identified by the inspector(s).

This is not a formal enforcement action and may not be a complete listing of all items of non-compliance discovered during the inspection.

Kelly M. Honey**PRINCIPAL INSPECTOR NAME**Environmental Specialist III**PRINCIPAL INSPECTOR TITLE****PRINCIPAL INSPECTOR SIGNATURE**FDEP**ORGANIZATION**8/12/2010**DATE**Shannon Camp**INSPECTOR NAME**Environmental Specialist II**INSPECTOR TITLE**NO SIGNATURE**INSPECTOR SIGNATURE**FDEP**ORGANIZATION**Lee Morris**REPRESENTATIVE NAME**Director of Operations**REPRESENTATIVE TITLE**NO SIGNATURE**REPRESENTATIVE SIGNATURE**HOWCO Environmental Services**ORGANIZATION**Richard Dillen**REPRESENTATIVE NAME**Quality Assurance Officer**REPRESENTATIVE TITLE**NO SIGNATURE**REPRESENTATIVE SIGNATURE**HOWCO Environmental Services**ORGANIZATION**

NOTE: By signing this document, the Site Representative only acknowledges receipt of this Inspection Report and is not admitting to the accuracy of any of the items identified by the Department as "Potential Violations" or areas of concern.

7009 1680 0001 0455 2884

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Certified Fee	AUG 12 2010
Return Receipt Fee (Endorsement Required)	Postmark Here
Restricted Delivery Fee (Endorsement Required)	SOUTHWEST DISTRICT
Total Postage & Fees	TEMPLE TERRACE
Sent To	Mr. Tim Hagan, President
Street, Apt. or PO Box	HOWCO Environmental Services
City, State	3701 Central Avenue
	St. Petersburg, FL 33713
PS Form 3800, October 2009 Edition. See reverse for instructions.	

## Stewart, Patricia

---

**From:** Stewart, Patricia  
**Sent:** Thursday, August 12, 2010 1:46 PM  
**To:** 'annicella.alan@epamail.epa.gov'; Perrigan, Glen; 'Quinn, Earl (Gene) E'  
**Subject:** HOWCO Environmental Services FLD 152 764 767 Warning Letter  
**Attachments:** HOWCO 8-12-10.pdf

Attached please find a copy of a warning letter. This is the only copy you will receive.

**NOTE:** If you have any questions concerning the contents of this document, please contact the DEP Environmental Specialist III [Kelly.Honey@dep.state.fl.us](mailto:Kelly.Honey@dep.state.fl.us)

Acrobat Reader 6.0 or greater is required to read this document. It is available for downloading at:  
<http://www.adobe.com/products/acrobat/readstep.html>

Thank you,  
Patricia Stewart  
Senior Clerk  
Department of Environmental Protection  
Southwest District  
13051 N. Telecom Parkway  
Temple Terrace, Florida 33637  
813-632-7600, X 356  
FAX: 813-632-7664  
[Patricia.Stewart@dep.state.fl.us](mailto:Patricia.Stewart@dep.state.fl.us)

**Stewart, Patricia**

---

**From:** Microsoft Exchange  
**To:** 'Quinn, Earl (Gene) E'  
**Sent:** Thursday, August 12, 2010 1:46 PM  
**Subject:** Relayed: HOWCO Environmental Services FLD 152 764 767 Warning Letter

**Delivery to these recipients or distribution lists is complete, but delivery notification was not sent by the destination:**

'Quinn, Earl (Gene) E'

**Subject:** HOWCO Environmental Services FLD 152 764 767 Warning Letter

---

Sent by Microsoft Exchange Server 2007

**Stewart, Patricia**

---

**From:** Microsoft Exchange  
**To:** Perrigan, Glen  
**Sent:** Thursday, August 12, 2010 1:46 PM  
**Subject:** Delivered: HOWCO Environmental Services FLD 152 764 767 Warning Letter

**Your message has been delivered to the following recipients:**

Perrigan, Glen

**Subject:** HOWCO Environmental Services FLD 152 764 767 Warning Letter

---

Sent by Microsoft Exchange Server 2007



**Stewart, Patricia**

---

**From:** Mail Delivery System [MAILER-DAEMON@mseive02.rtp.epa.gov]  
**To:** annicella.alan@epamail.epa.gov  
**Sent:** Thursday, August 12, 2010 1:46 PM  
**Subject:** Relayed: HOWCO Environmental Services FLD 152 764 767 Warning Letter

**Delivery to these recipients or distribution lists is complete, but delivery notification was not sent by the destination:**

[annicella.alan@epamail.epa.gov](mailto:annicella.alan@epamail.epa.gov)

Subject: HOWCO Environmental Services FLD 152 764 767 Warning Letter

**HOWCO Environmental Services**

Solid Waste Report

April-10

All numbers are in Gallons

Item	Start Inventory	Received/ Generated	Stop Inventory	Processed	Recycled	WTE	Landfilled
Drummed waste	1419	2211	0	3630	0	1357	3098
O.W.S. Sludge	6054	4715	8126	2643	2643	0	0
							0 On-site in Roll-Off
				<b>Total</b>	2643	1357	<b>3098</b>
<b>Cummulative</b>			<b>Cummulative Total</b>		<b>45570</b>	<b>5959</b>	<b>28086</b>
<b>%-Landfilled</b>	35						
<b>%-Recycled</b>	65						

Inserted into OCULUS

OCT 19 2011

Initials: \_\_\_\_\_



Phoslab Environmental Services, Inc.

806 West Beacon Road • Lakeland, FL 33803 • (863) 682-5897 • Fax: (863) 683-3279

**TOLL FREE 1-888-682-5897**

FDOH ID: E84925



## CERTIFICATE OF ANALYSIS

**Client:** HOWCO Environmental Services  
3701 Central Ave.  
St. Petersburg, FL 33713

**Attention:** Richard Dillen  
**Phone Number:** 727-328-7403  
**Fax Number:** 727-328-7782  
**Project Name:** Annual Compliance  
**Project Number:** P.O. # 44925  
**Project Location:** Florida  
**Sampled By:** R.D. / HES  
**Date Sampled:** 07/14/10  
**Date Received:** 07/15/10 11:15  
**Date Reported:** 07/28/10  
**Lab. Report #:** 071510-011

### Project Description

The analytical results for the samples identified in this report were submitted for analysis as outlined by the attached Chain of Custody. The results for the quality control samples were reviewed and found to meet the acceptance criteria for precision and accuracy or properly flagged. Unless noted in this report or a case narrative, all data in this analytical report is in compliance with NELAC standards. This report may not be reproduced in part or whole. This report may not be reproduced in part without the permission of PES.

Notes: Sample results reported at the Method Detection Limit.(MDL)  
Solid samples reported on Dry Weight basis.

**Approved By: David Pomella**  
David Pomella, Laboratory Director

**Approved By: Megan Skeen**  
Megan Skeen, Quality Assurance officer

If you have any questions, the above name should be contacted  
at 863-682-5897 8:00 A.M. - 5:00 PM M-F

PES Report: 8  
Data Qualifier: 1  
COC: 1  
Sample Log-In: 1  
Florida Spectrum: 15  
Total Pages: 26



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FDOH ID: E84925



## CASE NARRATIVE

**Lab. Report #:** 071510-011  
**Project Name:** Annual Compliance

### I. Sample Receiving Notes

Samples listed on the Chain of Custody # 071510-011 were received with containers intact, and at the proper temperature for the requested analyses.

### II. Analytical Data Notes

The analyses were performed in accordance with Phoslab Environmental Services SOP's and industry-standard methodologies in compliance with FDEP/NELAC criteria. There were no notable problems encountered in the analytical process.

### III. Quality Control Notes

There were not significant quality control anomalies associated with this work order.



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FDOH ID: E84925



**CERTIFICATE OF ANALYSIS**  
**TCLP Metals**

**Sample ID:** 071510-17  
**Sample Description/Matrix:** OES - 110 / Grab Sludge  
**Sample Date/Time:** 07/14/10 10:00  
**Date Received:** 07/15/10 11:15  
**Preparation Date/Method:** 07/19/10 1311  
**Analysis Date/Time:** 07/20/10 12:06  
**Method:** 1311 / EPA 6010B  
**Batch:** 072010A-L658  
**Dilution:** 10x  
**Initials:** MS/SN

Analytes:	Cas No.	Results	Units	MDL	PQL		Reg. Limits	Units
Arsenic (As)	7440-38-2	0.03 U	mg/L	0.03	0.10	<i>under limit</i>	5.0	mg/L
Barium (Ba)	7440-39-3	<b>1.80</b>	mg/L	0.02	0.10	<i>under limit</i>	100	mg/L
Cadmium (Cd)	7440-43-9	0.02 U	mg/L	0.02	0.10	<i>under limit</i>	1.0	mg/L
Chromium (Cr)	7440-47-3	0.02 U	mg/L	0.02	0.10	<i>under limit</i>	5.0	mg/L
Lead (Pb)	7439-92-1	0.03 U	mg/L	0.03	0.10	<i>under limit</i>	5.0	mg/L
Selenium (Se)	7789-49-2	0.08 U	mg/L	0.08	0.10	<i>under limit</i>	1.0	mg/L
Silver (Ag)	7440-22-4	0.03 U	mg/L	0.03	0.10	<i>under limit</i>	5.0	mg/L

**Sample ID:** 071510-17  
**Sample Description/Matrix:** OES - 110 / Grab Sludge  
**Sample Date/Time:** 07/14/10 10:00  
**Date Received:** 07/15/10 11:15  
**Preparation Date/Method:** 07/19/10 1311  
**Analysis Date/Time:** 07/20/10 12:34  
**Method:** EPA 7470A  
**Batch:** 072010-Hg553  
**Dilution:** 5x  
**Initials:** MS

Analytes:	Cas No.	Results	Units	MDL	PQL		Reg. Limits	Units
Mercury (Hg)	7439-97-6	0.00040 U	mg/L	0.00040	0.00050	<i>under limit</i>	0.2	mg/L



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**TOLL FREE 1-888-682-5897**

FDOH ID: E84925



**CERTIFICATE OF ANALYSIS**  
**TCLP Metals**

**Sample ID:** 071510-18  
**Sample Description/Matrix:** WWTS / Grab Sludge  
**Sample Date/Time:** 07/14/10 10:30  
**Date Received:** 07/15/10 11:15  
**Preparation Date/Method:** 07/19/10 1311  
**Analysis Date/Time:** 07/20/10 12:06  
**Method:** 1311 / EPA 6010B  
**Batch:** 072010A-L658  
**Dilution:** 10x  
**Initials:** MS/SN

Analytes:	Cas No.	Results	Units	MDL	PQL		Reg. Limits	Units
Arsenic (As)	7440-38-2	0.03 U	mg/L	0.03	0.10	<i>under limit</i>	5.0	mg/L
Barium (Ba)	7440-39-3	1.07	mg/L	0.02	0.10	<i>under limit</i>	100	mg/L
Cadmium (Cd)	7440-43-9	0.02 U	mg/L	0.02	0.10	<i>under limit</i>	1.0	mg/L
Chromium (Cr)	7440-47-3	0.02 U	mg/L	0.02	0.10	<i>under limit</i>	5.0	mg/L
Lead (Pb)	7439-92-1	0.03 U	mg/L	0.03	0.10	<i>under limit</i>	5.0	mg/L
Selenium (Se)	7789-49-2	0.08 U	mg/L	0.08	0.10	<i>under limit</i>	1.0	mg/L
Silver (Ag)	7440-22-4	0.03 U	mg/L	0.03	0.10	<i>under limit</i>	5.0	mg/L

**Sample ID:** 071510-18  
**Sample Description/Matrix:** WWTS / Grab Sludge  
**Sample Date/Time:** 07/14/10 10:30  
**Date Received:** 07/15/10 11:15  
**Preparation Date/Method:** 07/19/10 1311  
**Analysis Date/Time:** 07/20/10 12:36  
**Method:** EPA 7470A  
**Batch:** 072010-Hg553  
**Dilution:** 5x  
**Initials:** MS

Analytes:	Cas No.	Results	Units	MDL	PQL		Reg. Limits	Units
Mercury (Hg)	7439-97-6	0.00040 U	mg/L	0.00040	0.00050	<i>under limit</i>	0.2	mg/L



Phoslab Environmental Services, Inc.

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**TOLL FREE 1-800-882-5897**

FDOH ID: E84925



**CERTIFICATE OF ANALYSIS**  
**TCLP Volatiles**

**Sample ID:** 071510-17  
**Sample Description:** OES - 110 / Grab Sludge  
**Sample Date/Time:** 07/14/10 10:00  
**Date Received:** 07/15/10 11:15  
**Preparation Date / Method:** 07/19/10 1311  
**Analysis Date/ Time:** 07/22/10 20:26  
**Method:** 8021B  
**Batch:** 072210-tclp  
**Dilution:** 50x  
**Initials:** MS

Analytes:	Cas No.	Results	Units	RL mg/L	MDL mg/L		Reg. Limits
Benzene	71-43-2	0.10 U	mg/L	0.10	0.002	<i>under limit</i>	0.5
Carbon Tetrachloride	56-23-5	0.25 U	mg/L	0.25	0.005	<i>under limit</i>	0.5
Chlorobenzene	108-90-7	0.10 U	mg/L	0.10	0.002	<i>under limit</i>	100
Chloroform	67-66-3	0.25 U	mg/L	0.25	0.005	<i>under limit</i>	6
1,1-Dichloroethene	75-35-4	0.10 U	mg/L	0.10	0.002	<i>under limit</i>	0.7
1,2-Dichloroethane	107-06-2	0.25 U	mg/L	0.25	0.005	<i>under limit</i>	0.5
1,4-Dichlorobenzene	106-46-7	0.10 U	mg/L	0.10	0.002	<i>under limit</i>	7.5
Methyl Ethyl Ketone	78-93-3	1.00 U	mg/L	1.00	0.020	<i>under limit</i>	200
Tetrachloroethene	127-18-4	0.10 U	mg/L	0.10	0.002	<i>under limit</i>	0.7
Trichloroethene	79-01-6	0.10 U	mg/L	0.10	0.002	<i>under limit</i>	0.5
Vinyl Chloride	75-01-4	0.10 U	mg/L	0.10	0.002	<i>under limit</i>	0.2

Surrogate(s)	% Recovery	Limits
a,a,a-Trifluorotoluene	94	85-115
4-Bromochlorobenzene	104	85-115





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FDOH ID: E84925



**CERTIFICATE OF ANALYSIS**  
**TCLP Volatiles**

**Sample ID:** 071510-18  
**Sample Description:** WWTS / Grab Sludge  
**Sample Date/Time:** 07/14/10 10:30  
**Date Received:** 07/15/10 11:15  
**Preparation Date / Method:** 07/19/10 1311  
**Analysis Date/ Time:** 07/22/10 21:13  
**Method:** 8021B  
**Batch:** 072210-tclp  
**Dilution:** 50x  
**Initials:** MS

Analytes:	Cas No.	Results	Units	RL mg/L	MDL mg/L		Reg. Limits
Benzene	71-43-2	0.10 U	mg/L	0.10	0.002	<i>under limit</i>	0.5
Carbon Tetrachloride	56-23-5	0.25 U	mg/L	0.25	0.005	<i>under limit</i>	0.5
Chlorobenzene	108-90-7	0.10 U	mg/L	0.10	0.002	<i>under limit</i>	100
Chloroform	67-66-3	0.25 U	mg/L	0.25	0.005	<i>under limit</i>	6
1,1-Dichloroethene	75-35-4	0.10 U	mg/L	0.10	0.002	<i>under limit</i>	0.7
1,2-Dichloroethane	107-06-2	0.25 U	mg/L	0.25	0.005	<i>under limit</i>	0.5
1,4-Dichlorobenzene	106-46-7	0.10 U	mg/L	0.10	0.002	<i>under limit</i>	7.5
Methyl Ethyl Ketone	78-93-3	1.00 U	mg/L	1.00	0.02	<i>under limit</i>	200
Tetrachloroethene	127-18-4	0.10 U	mg/L	0.10	0.002	<i>under limit</i>	0.7
Trichloroethene	79-01-6	0.10 U	mg/L	0.10	0.002	<i>under limit</i>	0.5
Vinyl Chloride	75-01-4	0.10 U	mg/L	0.10	0.002	<i>under limit</i>	0.2

Surrogate(s)	% Recovery	Limits
a,a,a-Trifluorotoluene	108	85-115
4-Bromochlorobenzene	108	85-115



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FDOH ID: E84925



# QUALITY CONTROL DATA TCLP Metals

## SPIKE DATA (6010B)

Analysis Date/Time: 07/20/10 12:06  
Batch: 072010A-L658  
Initials: MS / SN

Parameter	Spike @ mg/L	Spike mg/L	Spike dup mg/L	RPD	Spike % Recov	Spike Dup % Recov	Limits	Flag
Arsenic (As)	10.0	9.51	9.49	0.2	95	95	80-120	
Barium (Ba)	10.0	10.3	10.3	0.1	103	103	80-120	
Cadmium (Cd)	10.0	9.16	9.15	0.1	92	92	80-120	
Chromium (Cr)	10.0	9.06	9.02	0.4	91	90	80-120	
Lead (Pb)	10.0	9.79	9.72	0.7	98	97	80-120	
Selenium (Se)	10.0	9.84	9.78	0.6	98	98	80-120	
Silver (Ag)	10.0	8.24	8.26	0.2	82	83	80-120	

## SPIKE DATA (EPA 7470A)

Analysis Date/Time: 07/20/10 12:04  
Batch: 072010-Hg553  
Initials: MS

Analyte:		Spike @ mg/L	Spike mg/L Recov		Spike % Recov	Limits	Flag
Mercury (Hg)	LCS	0.00250	0.00261		104	90-110	
Mercury (Hg)	MS	0.00250	0.00253		101	85-115	
Mercury (Hg)	MSD	0.00250	0.00249		100	85-115	

## LAB BLANK

Analysis Date/Time: 07/20/10 12:06  
Batch: 072010A-L658  
Initials: MS / SN

Analytes:	Results	Units
Arsenic (As)	0.003 U	mg/L
Barium (Ba)	0.003 U	mg/L
Cadmium (Cd)	0.002 U	mg/L
Chromium (Cr)	0.002 U	mg/L
Lead (Pb)	0.003 U	mg/L
Mercury (Hg)	0.00008 U	mg/L
Selenium (Se)	0.008 U	mg/L
Silver (Ag)	0.003 U	mg/L

LCS = Laboratory Control Standard

U = Compound analyzed but not detected to the level shown

RPD = Relative Percent Difference

MS = Matrix Spike

MSD = Matrix Spike Duplicate



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FDOH ID: E84925



# QUALITY CONTROL DATA TCLP Volatiles

## SPIKE DATA (EPA8021B)

Analysis Date/ Time: 07/22/10 18:03  
Batch: 072210-tclp  
Initials: MS

Parameter	LCS	QA/QC LIMITS	MS	MSD	RPD	LIMIT	Flag
Benzene	85	85-115	86	86	0	<30	
Carbon Tetrachloride	109	85-115	112	90	22	<30	
Chlorobenzene	89	80-120	97	96	1	<30	
Chloroform	85	85-115	86	86	0	<30	
1,1-Dichloroethene	93	80-120	96	92	4	<30	
1,2-Dichloroethane	108	85-115	110	86	24	<30	
1,4-Dichlorobenzene	88	85-115	97	97	0	<30	
Methyl Ethyl Ketone	93	85-115	90	88	2	<30	
Tetrachloroethene	92	85-115	96	94	2	<30	
Trichloroethene	93	85-115	96	94	2	<30	
Vinyl Chloride	112	80-120	113	110	3	<30	

## LAB BLANK

Analysis Date/ Time: 07/22/10 18:03  
Batch: 072210-tclp  
Initials: MS

Analytes:	Results	Units
Benzene	0.002 U	mg/L
Carbon Tetrachloride	0.005 U	mg/L
Chlorobenzene	0.002 U	mg/L
Chloroform	0.005 U	mg/L
1,1-Dichloroethene	0.002 U	mg/L
1,2-Dichloroethane	0.005 U	mg/L
1,4-Dichlorobenzene	0.002 U	mg/L
Methyl Ethyl Ketone	0.020 U	mg/L
Tetrachloroethene	0.002 U	mg/L
Trichloroethene	0.002 U	mg/L
Vinyl Chloride	0.002 U	mg/L

Surrogate(s)	% Recovery	Limits
a,a,a-Trifluorotoluene	90	85-115
4-Bromochlorobenzene	95	85-115

LCS = Laboratory Control Standard

J = recovery limits exceeded

MS = Matrix Spike

MSD = Matrix Spike Duplicate

U = Compound analyzed but not detected to the level shown

## DATA QUALIFIER CODES

### SYMBOL MEANING

- A Value reported is the arithmetic mean (average) of two or more determinations. This code shall be used if the reported value is the average of results for two or more discrete and separate samples. These samples shall have been processed and analyzed independently. Do not use this code if the data are the result of replicate analysis on the same sample aliquot, extract or digestate.
- H Value based on field kit determination; results may not be accurate. This code shall be used if a field screening test (i.e., field gas chromatograph data, immunoassay, vendor-supplied field kit, etc.) was used to generate the value and the field kit or method has not been recognized by the Department as equivalent to laboratory methods.
- I The reported value is between the laboratory method detection limit and the laboratory practical quantitation limit.
- J Estimated value. A "J" value shall be accompanied by a narrative justification for its use. Where possible, the organization shall report whether the actual value is less than or greater than the reported value. A "J" value shall not be used as a substitute for K, L, M, T, V or Y, however, if additional reasons exist for identifying the value as estimate (e.g., matrix spiked failed to meet acceptance criteria), the "J" code may be added to a K, L, M, T, V, or Y. The following are some examples of narrative descriptions that may accompany a "J" code:
- No known quality control criteria exist for the component;
  - The reported value failed to meet the established quality control criteria for either precision or accuracy (the specific failure must be identified);
  - The sample matrix interfered with the ability to make any accurate determination;
  - The data are questionable because of improper laboratory or field protocols (e.g., composite sample was collected instead of a grab sample).
  - The field calibration verification did not meet calibration acceptance criteria.
- K Off-scale low. Actual value is known to be less than the value given. This code shall be used if:
1. The value is less than the lowest calibration standard and the calibration curve is known to be non-linear; or
  2. The value is known to be less than the reported value based on sample size, dilution.
- This code shall not be used to report values that are less than the laboratory practical quantitation limit or laboratory method detection limit.
- L Off-scale high. Actual value is known to be greater than value given. To be used when the concentration of the analyte is above the acceptable level for quantitation (exceeds the linear range or highest calibration standard) and the calibration curve is known to exhibit a negative deflection.
- M When reporting chemical analyses: presence of material is verified but not quantified; the actual value is less than the value given. The reported value shall be the laboratory practical quantitation limit. This code shall be used if the level is too low to permit accurate quantification, but the estimated concentration is greater than the method detection limit. If the value is less than the method detection limit use "T" below.
- N Presumptive evidence of presence of material. This qualifier shall be used if:
1. The component has been tentatively identified based on mass spectral library search; or
  2. There is an indication that the analyte is present, but quality control requirements for confirmation were not met (i.e., presence of analyte was not confirmed by alternative procedures).
- O Sampled, but analysis lost or not performed.
- Q Sample held beyond the accepted holding time. This code shall be used if the value is derived from a sample that was prepared or analyzed after the approved holding time restrictions for sample preparation or analysis.
- T Value reported is less than the laboratory method detection limit. The value is reported for informational purposes only and shall not be used in statistical analysis.
- U Indicates that the compound was analyzed for but not detected. This symbol shall be used to indicate that the specified component **was not** detected. The value associated with the qualifier shall be the laboratory method detection limit. Unless requested by the client, less than the method detection limit values shall not be reported (see "T" above).
- V Indicates that the analyte was detected in both the sample and the associated method blank. Note: the value in the blank shall not be subtracted from associated samples.
- Y The laboratory analysis was from an improperly preserved sample. The data may not be accurate.
- ? Data are rejected and should not be used. Some or all of the quality control data for the analyte were outside criteria, and the presence or absence of the analyte cannot be determined from the data.
- \* Not currently accredited for this analyte.
- ! Not within scope of method.



806 West Beacon Road  
Lakeland, Florida 33803-2847  
Phone: 863-682-5897  
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FDEP CompQAP No: 870308G  
FDOH ID#: E84925

Chain of Custody Record 071510.01

[illegible]

## Sample Log-in Checklist



**Report To:**  
Megan Skeen  
Phoslab Environmental Svcs Inc  
806 West Beacon Road  
Lakeland, FL 33803

**Page 1 of 14**  
**Report Printed:** 07/26/10  
**Submission #** 1007000440  
**Order #** 25476

**Project:** Annual Compliance / 071510.011  
**Site Location:** Annual Compliance / 071510.011  
**Matrix:** Soils/Sediments

**Sample I.D.:** OES-110  
**Collected:** 07/14/10 10:00  
**Received:** 07/17/10 10:00  
**Collected by:** Client

### LABORATORY ANALYSIS REPORT

PARAMETER	RESULT	QC	UNITS	MDL	PQL	METHOD	DATE EXT.	DATE ANALY.	ANALYST
TCLP Extraction Procedure	FLUID #1					1311 Ext.	07/20 14:42	07/21 14:42	AC
<b>8151 TCLP: Chlorophenoxy Herbicides</b>									
						Dilution Factor = 1			
2,4-D	U	U	ug/L	0.011	0.033	1311/515/8151	07/21 15:46	07/23 15:46	AC
2,4,5-TP (silvex)	U	U	ug/L	0.005	0.015	1311/515/8151	07/21 15:46	07/23 15:46	AC
<b>8270D TCLP: Semivolatile Organics by GC/MS</b>									
						Dilution Factor = 1			
N-Nitrosodimethylamine	U	U	ug/L	13.35	40.05	1311/8270D	07/21 14:43	07/22 14:43	AC
Phenol	U	U	ug/L	14.67	44.01	1311/8270D	07/21 14:43	07/22 14:43	AC
Bis (2-Chloroethyl) Ether	U	U	ug/L	8.26	24.78	1311/8270D	07/21 14:43	07/22 14:43	AC
2-Chlorophenol	U	U	ug/L	11.49	34.47	1311/8270D	07/21 14:43	07/22 14:43	AC
1,3-Dichlorobenzene	U	U	ug/L	14.06	42.18	1311/8270D	07/21 14:43	07/22 14:43	AC
1,4-Dichlorobenzene	U	U	ug/L	15.92	47.76	1311/8270D	07/21 14:43	07/22 14:43	AC
Benzyl Alcohol	U	U	ug/L	15.39	46.17	1311/8270D	07/21 14:43	07/22 14:43	AC
1,2-Dichlorobenzene	U	U	ug/L	12.36	37.08	1311/8270D	07/21 14:43	07/22 14:43	AC
2-Methyl Phenol (O-Cresol)	U	U	ug/L	14.60	43.80	1311/8270D	07/21 14:43	07/22 14:43	AC
Bis (2-Chloroisopropyl) Ether	U	U	ug/L	12.74	38.22	1311/8270D	07/21 14:43	07/22 14:43	AC
4-Methyl Phenol (P-Cresol)	67.1		ug/L	1.95	5.85	1311/8270D	07/21 14:43	07/22 14:43	AC
3-Methyl Phenol (M-Cresol)	U	U	ug/L	12.95	38.85	1311/8270D	07/21 14:43	07/22 14:43	AC
N-Nitrosodi-N-Propylamine	U	U	ug/L	12.90	38.70	1311/8270D	07/21 14:43	07/22 14:43	AC

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Pembroke Laboratory  
528 Gooch Rd.  
Fort Mead, FL 33841

Big Lake Laboratory  
415 B SW Park St.  
Okeechobee, FL 34972

Spectrum Laboratories  
830 Indian St.  
Savannah, GA 31401

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All NELAP certified analyses are performed in accordance with Chapter 64E-1 Florida Administrative Code, which has been determined to be equivalent to NELAC standards. Analyses certified by programs other than NELAP are designated with a "-".



Report To:  
Megan Skeen  
Phoslab Environmental Svcs Inc  
806 West Beacon Road  
Lakeland, FL 33803

Page 2 of 14  
Report Printed: 07/26/10  
Submission # 1007000440  
Order # 25476

Project: Annual Compliance / 071510.011  
Site Location: Annual Compliance / 071510.011  
Matrix: Soils/Sediments

Sample I.D.: OES-110  
Collected: 07/14/10 10:00  
Received: 07/17/10 10:00  
Collected by: Client

### LABORATORY ANALYSIS REPORT

PARAMETER	RESULT	QC	UNITS	MDL	PQL	METHOD	DATE EXT.	DATE ANALY.	ANALYST
Hexachloroethane	U	U	ug/L	10.57	31.71	1311/8270D	07/21 14:43	07/22 14:43	AC
Nitrobenzene	U	U	ug/L	14.51	43.53	1311/8270D	07/21 14:43	07/22 14:43	AC
Isophorone	U	U	ug/L	15.92	47.76	1311/8270D	07/21 14:43	07/22 14:43	AC
2-Nitrophenol	U	U	ug/L	17.47	52.41	1311/8270D	07/21 14:43	07/22 14:43	AC
2,4-Dimethylphenol	U	U	ug/L	12.50	37.50	1311/8270D	07/21 14:43	07/22 14:43	AC
Bis (2-Chloroethoxy)methane	U	U	ug/L	10.99	32.97	1311/8270D	07/21 14:43	07/22 14:43	AC
2,4-Dichlorophenol	U	U	ug/L	18.81	56.43	1311/8270D	07/21 14:43	07/22 14:43	AC
1,2,3-Trichlorobenzene	U	U	ug/L	3.20	9.60	1311/8270D	07/21 14:43	07/22 14:43	AC
1,2,4-Trichlorobenzene	U	U	ug/L	15.75	47.25	1311/8270D	07/21 14:43	07/22 14:43	AC
Naphthalene	3.88		ug/L	0.02	0.06	1311/8270D	07/21 14:43	07/22 14:43	AC
Hexachlorobutadiene	U	U	ug/L	11.64	34.92	1311/8270D	07/21 14:43	07/22 14:43	AC
4-Chloro-3-Methylphenol	57.1		ug/L	17.48	52.44	1311/8270D	07/21 14:43	07/22 14:43	AC
1-Methylnaphthalene	0.960	I	ug/L	0.36	1.08	1311/8270D	07/21 14:43	07/22 14:43	AC
2-Methylnaphthalene	1.49		ug/L	0.02	0.06	1311/8270D	07/21 14:43	07/22 14:43	AC
Hexachlorocyclopentadiene	U	U	ug/L	1.72	5.16	1311/8270D	07/21 14:43	07/22 14:43	AC
2,3,6-Trichlorophenol	U	U	ug/L	2.50	7.50	1311/8270D	07/21 14:43	07/22 14:43	AC
2,4,5-Trichlorophenol	U	U	ug/L	17.05	51.15	1311/8270D	07/21 14:43	07/22 14:43	AC
2,4,6-Trichlorophenol	U	U	ug/L	16.62	49.86	1311/8270D	07/21 14:43	07/22 14:43	AC

Report To:  
Megan Skeen  
Phoslab Environmental Svcs Inc  
806 West Beacon Road  
Lakeland, FL 33803

Page 3 of 14  
Report Printed: 07/26/10  
Submission # 1007000440  
Order # 25476

Project: Annual Compliance / 071510.011  
Site Location: Annual Compliance / 071510.011  
Matrix: Soils/Sediments

Sample I.D.: OES-110  
Collected: 07/14/10 10:00  
Received: 07/17/10 10:00  
Collected by: Client

### LABORATORY ANALYSIS REPORT

PARAMETER	RESULT	QC	UNITS	MDL	PQL	METHOD	DATE EXT.	DATE ANALY.	ANALYST
2-Chloronaphthalene	U	U	ug/L	15.91	47.73	1311/8270D	07/21 14:43	07/22 14:43	AC
Dimethyl Phthalate	U	U	ug/L	16.23	48.69	1311/8270D	07/21 14:43	07/22 14:43	AC
Acenaphthylene	U	U	ug/L	0.02	0.06	1311/8270D	07/21 14:43	07/22 14:43	AC
2,6-Dinitrotoluene	U	U	ug/L	14.51	43.53	1311/8270D	07/21 14:43	07/22 14:43	AC
Acenaphthene	U	U	ug/L	0.02	0.06	1311/8270D	07/21 14:43	07/22 14:43	AC
2,4-Dinitrophenol	U	U	ug/L	0.80	2.40	1311/8270D	07/21 14:43	07/22 14:43	AC
2,4-Dinitrotoluene	U	U	ug/L	18.21	54.63	1311/8270D	07/21 14:43	07/22 14:43	AC
4-Nitrophenol	U	U	ug/L	1.70	5.10	1311/8270D	07/21 14:43	07/22 14:43	AC
Diethyl Phthalate	U	U	ug/L	11.65	34.95	1311/8270D	07/21 14:43	07/22 14:43	AC
Fluorene	U	U	ug/L	0.012	0.036	1311/8270D	07/21 14:43	07/22 14:43	AC
4-Chlorophenyl Phenyl Ether	U	U	ug/L	18.33	54.99	1311/8270D	07/21 14:43	07/22 14:43	AC
4,6-Dinitro-2-Methylphenol	U	U	ug/L	1.67	5.01	1311/8270D	07/21 14:43	07/22 14:43	AC
N-Nitrosodiphenylamine	U	U	ug/L	13.34	40.02	1311/8270D	07/21 14:43	07/22 14:43	AC
4-Bromophenyl Phenyl Ether	U	U	ug/L	14.10	42.30	1311/8270D	07/21 14:43	07/22 14:43	AC
Hexachlorobenzene	U	U	ug/L	10.60	31.80	1311/8270D	07/21 14:43	07/22 14:43	AC
Pentachlorophenol	U	U	ug/L	2.13	6.39	1311/8270D	07/21 14:43	07/22 14:43	AC
Phenanthrene	U	U	ug/L	14.530	43.590	1311/8270D	07/21 14:43	07/22 14:43	AC
Anthracene	U	U	ug/L	0.049	0.147	1311/8270D	07/21 14:43	07/22 14:43	AC

Report To:  
Megan Skeen  
Phoslab Environmental Svcs Inc  
806 West Beacon Road  
Lakeland, FL 33803

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Order # 25476

Project: Annual Compliance / 071510.011  
Site Location: Annual Compliance / 071510.011  
Matrix: Soils/Sediments

Sample I.D.: OES-110  
Collected: 07/14/10 10:00  
Received: 07/17/10 10:00  
Collected by: Client

### LABORATORY ANALYSIS REPORT

PARAMETER	RESULT	QC	UNITS	MDL	PQL	METHOD	DATE EXT.	DATE ANALY.	ANALYST
Di-N-Butyl Phthalate	U	U	ug/L	15.76	47.28	1311/8270D	07/21 14:43	07/22 14:43	AC
Fluoranthene	U	U	ug/L	0.025	0.075	1311/8270D	07/21 14:43	07/22 14:43	AC
Benzidine	U	U	ug/L	6.53	19.59	1311/8270D	07/21 14:43	07/22 14:43	AC
Pyrene	U	U	ug/L	0.017	0.051	1311/8270D	07/21 14:43	07/22 14:43	AC
Butyl Benzyl Phthalate	U	U	ug/L	17.50	52.50	1311/8270D	07/21 14:43	07/22 14:43	AC
Benzo(A)Anthracene	U	U	ug/L	2.30	6.90	1311/8270D	07/21 14:43	07/22 14:43	AC
3,3-Dichlorobenzidine	U	U	ug/L	10.96	32.88	1311/8270D	07/21 14:43	07/22 14:43	AC
Chrysene	U	U	ug/L	0.75	2.25	1311/8270D	07/21 14:43	07/22 14:43	AC
Bis (2 Ethylhexyl) Phthalate	U	U	ug/L	23.69	71.07	1311/8270D	07/21 14:43	07/22 14:43	AC
Di-N-Octyl Phthalate	U	U	ug/L	17.66	52.98	1311/8270D	07/21 14:43	07/22 14:43	AC
Benzo(B)Fluoranthene	U	U	ug/L	4.12	12.36	1311/8270D	07/21 14:43	07/22 14:43	AC
Benzo(K)Fluoranthene	U	U	ug/L	0.025	0.075	1311/8270D	07/21 14:43	07/22 14:43	AC
Benzo(A)Pyrene	U	U	ug/L	0.017	0.051	1311/8270D	07/21 14:43	07/22 14:43	AC
Indeno(1,2,3-CD)Pyrene	U	U	ug/L	3.10	9.30	1311/8270D	07/21 14:43	07/22 14:43	AC
Dibenzo(A,H,)Anthracene	U	U	ug/L	2.42	7.26	1311/8270D	07/21 14:43	07/22 14:43	AC
Benzo(G,H,I)Perylene	U	U	ug/L	0.017	0.051	1311/8270D	07/21 14:43	07/22 14:43	AC
Bis-2-ethylhexyl Adipate	U	U	ug/L	0.760	2.280	1311/8270D	07/21 14:43	07/22 14:43	AC
Aldrin	U	U	ug/L	0.017	0.051	1311/8270D	07/21 14:43	07/22 14:43	AC

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Project: Annual Compliance / 071510.011  
Site Location: Annual Compliance / 071510.011  
Matrix: Soils/Sediments

Sample I.D.: OES-110  
Collected: 07/14/10 10:00  
Received: 07/17/10 10:00  
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### LABORATORY ANALYSIS REPORT

PARAMETER	RESULT	QC	UNITS	MDL	PQL	METHOD	DATE EXT.	DATE ANALY.	ANALYST
$\alpha$ -BHC ~	U	U	ug/L	0.03	0.09	1311/8270D	07/21 14:43	07/22 14:43	AC
$\beta$ -BHC ~	U	U	ug/L	0.03	0.09	1311/8270D	07/21 14:43	07/22 14:43	AC
$\sigma$ -BHC ~	U	U	ug/L	0.03	0.09	1311/8270D	07/21 14:43	07/22 14:43	AC
$\gamma$ -BHC (Lindane) ~	U	U	ug/L	0.004	0.012	1311/8270D	07/21 14:43	07/22 14:43	AC
Cresol ~	U	U	ug/L	1.5	4.5	1311/8270D	07/21 14:43	07/22 14:43	AC
Endrin ~	U	U	ug/L	0.186	0.558	1311/8270D	07/21 14:43	07/22 14:43	AC
Heptachlor ~	U	U	ug/L	0.78	2.34	1311/8270D	07/21 14:43	07/22 14:43	AC
Heptachlor Epoxide ~	U	U	ug/L	1.68	5.04	1311/8270D	07/21 14:43	07/22 14:43	AC
Chlordane ~	U	U	ug/L	1.0	3.0	1311/8270D	07/21 14:43	07/22 14:43	AC
4,4'-DDD ~	U	U	ug/L	0.63	1.89	1311/8270D	07/21 14:43	07/22 14:43	AC
4,4'-DDE ~	U	U	ug/L	0.39	1.17	1311/8270D	07/21 14:43	07/22 14:43	AC
4,4'-DDT ~	U	U	ug/L	0.69	2.07	1311/8270D	07/21 14:43	07/22 14:43	AC
Dieldrin ~	U	U	ug/L	0.840	2.520	1311/8270D	07/21 14:43	07/22 14:43	AC
Endosulfan I ~	U	U	ug/L	0.006	0.018	1311/8270D	07/21 14:43	07/22 14:43	AC
Endosulfan II ~	U	U	ug/L	0.006	0.018	1311/8270D	07/21 14:43	07/22 14:43	AC
Endosulfan Sulfate ~	U	U	ug/L	0.007	0.021	1311/8270D	07/21 14:43	07/22 14:43	AC
Endrin Aldehyde ~	U	U	ug/L	0.190	0.570	1311/8270D	07/21 14:43	07/22 14:43	AC
Toxaphene ~	U	U	ug/L	0.90	2.70	1311/8270D	07/21 14:43	07/22 14:43	AC

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Site Location: Annual Compliance / 071510.011  
Matrix: Soils/Sediments

Sample I.D.: OES-110  
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### LABORATORY ANALYSIS REPORT

PARAMETER	RESULT	QC	UNITS	MDL	PQL	METHOD	DATE EXT.	DATE ANALY.	ANALYST
PCB-1016 ~	U	U	ug/L	0.30	0.90	1311/8270D	07/21 14:43	07/22 14:43	AC
PCB-1221 ~	U	U	ug/L	0.30	0.90	1311/8270D	07/21 14:43	07/22 14:43	AC
PCB-1232 ~	U	U	ug/L	0.30	0.90	1311/8270D	07/21 14:43	07/22 14:43	AC
PCB-1242 ~	U	U	ug/L	0.30	0.90	1311/8270D	07/21 14:43	07/22 14:43	AC
PCB-1248 ~	U	U	ug/L	0.30	0.90	1311/8270D	07/21 14:43	07/22 14:43	AC
PCB-1254 ~	U	U	ug/L	0.30	0.90	1311/8270D	07/21 14:43	07/22 14:43	AC
PCB-1260 ~	U	U	ug/L	0.30	0.90	1311/8270D	07/21 14:43	07/22 14:43	AC
Dioxin (Screen)	U	U	ug/L	0.03	0.09	1311/8270D	07/21 14:43	07/22 14:43	AC
Azobenzene ~	U	U	ug/L	0.75	2.25	1311/8270D	07/21 14:43	07/22 14:43	AC
Methoxychlor ~	U	U	ug/L	0.007	0.021	1311/8270D	07/21 14:43	07/22 14:43	AC
Benzoic Acid	31.4		ug/L	0.84	2.52	1311/8270D	07/21 14:43	07/22 14:43	AC
Aniline	U	U	ug/L	8.49	25.47	1311/8270D	07/21 14:43	07/22 14:43	AC
4-Chloroaniline	U	U	ug/L	14.28	42.84	1311/8270D	07/21 14:43	07/22 14:43	AC
Dibenzofuran	U	U	ug/L	17.38	52.14	1311/8270D	07/21 14:43	07/22 14:43	AC
2-Nitroaniline	U	U	ug/L	15.58	46.74	1311/8270D	07/21 14:43	07/22 14:43	AC
3-Nitroaniline	U	U	ug/L	21.73	65.19	1311/8270D	07/21 14:43	07/22 14:43	AC
4-Nitroaniline	U	U	ug/L	19.94	59.82	1311/8270D	07/21 14:43	07/22 14:43	AC
Carbazole ~	U	U	ug/L	0.68	2.04	1311/8270D	07/21 14:43	07/22 14:43	AC

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Matrix: Soils/Sediments


Sample I.D.: OES-110  
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### LABORATORY ANALYSIS REPORT

PARAMETER	RESULT	QC	UNITS	MDL	PQL	METHOD	DATE EXT.	DATE ANALY.	ANALYST
2,6-Dichlorophenol	U	U	ug/L	16.6	49.8	1311/8270D	07/21 14:43	07/22 14:43	AC
2,3,4,6-Tetrachlorophenol	U	U	ug/L	15.87	47.61	1311/8270D	07/21 14:43	07/22 14:43	AC
2,3,5,6-Tetrachlorophenol	U	U	ug/L	0.97	2.91	1311/8270D	07/21 14:43	07/22 14:43	AC
Pyridine	U	U	ug/L	2.09	6.27	1311/8270D	07/21 14:43	07/22 14:43	AC

Unless indicated, soil results are reported based on actual (wet) weight basis.

Analytes not currently NELAC certified denoted by -  
Work performed by outside (subcontract) labs denoted by Cert.ID in Analyst Field.  
Results relate only to this sample.  
QC=Qualifier Codes as defined by DEP 62-160  
U=Analyzed for but not detected.  
Q=Sample held beyond accepted holding time.  
I=Value is between MDL and PQL.  
J=Estimated value.

  
Authorized CSM Signature (954) 978-6400  
Florida-Spectrum Environmental Services, Inc.  
Certification # E86006

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Project: Annual Compliance / 071510.011  
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Matrix: Soils/Sediments

Sample I.D.: WWTS  
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### LABORATORY ANALYSIS REPORT

PARAMETER	RESULT	QC	UNITS	MDL	PQL	METHOD	DATE EXT.	DATE ANALY.	ANALYST
TCLP Extraction Procedure	FLUID #2					1311 Ext.	07/20 14:45	07/21 14:45	AC
8151 TCLP: Chlorophenoxy Herbicides Dilution Factor = 1									
2,4-D	U	U	ug/L	0.011	0.033	1311/515/8151	07/21 15:47	07/23 15:47	AC
2,4,5-TP (silvex)	U	U	ug/L	0.005	0.015	1311/515/8151	07/21 15:47	07/23 15:47	AC
8270D TCLP: Semivolatile Organics by GC/MS Dilution Factor = 1									
N-Nitrosodimethylamine	U	U	ug/L	13.35	40.05	1311/8270D	07/21 14:45	07/22 14:45	AC
Phenol	U	U	ug/L	14.67	44.01	1311/8270D	07/21 14:45	07/22 14:45	AC
Bis (2-Chloroethyl) Ether	U	U	ug/L	8.26	24.78	1311/8270D	07/21 14:45	07/22 14:45	AC
2-Chlorophenol	U	U	ug/L	11.49	34.47	1311/8270D	07/21 14:45	07/22 14:45	AC
1,3-Dichlorobenzene	U	U	ug/L	14.06	42.18	1311/8270D	07/21 14:45	07/22 14:45	AC
1,4-Dichlorobenzene	U	U	ug/L	15.92	47.76	1311/8270D	07/21 14:45	07/22 14:45	AC
Benzyl Alcohol	U	U	ug/L	15.39	46.17	1311/8270D	07/21 14:45	07/22 14:45	AC
1,2-Dichlorobenzene	U	U	ug/L	12.36	37.08	1311/8270D	07/21 14:45	07/22 14:45	AC
2-Methyl Phenol (O-Cresol)	U	U	ug/L	14.60	43.80	1311/8270D	07/21 14:45	07/22 14:45	AC
Bis (2-Chloroisopropyl) Ether	U	U	ug/L	12.74	38.22	1311/8270D	07/21 14:45	07/22 14:45	AC
4-Methyl Phenol (P-Cresol)	4.96	I	ug/L	1.95	5.85	1311/8270D	07/21 14:45	07/22 14:45	AC
3-Methyl Phenol (M-Cresol)	U	U	ug/L	12.95	38.85	1311/8270D	07/21 14:45	07/22 14:45	AC
N-Nitrosodi-N-Propylamine	U	U	ug/L	12.90	38.70	1311/8270D	07/21 14:45	07/22 14:45	AC



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### LABORATORY ANALYSIS REPORT

PARAMETER	RESULT	QC	UNITS	MDL	PQL	METHOD	DATE EXT.	DATE ANALY.	ANALYST
Hexachloroethane	U	U	ug/L	10.57	31.71	1311/8270D	07/21 14:45	07/22 14:45	AC
Nitrobenzene	U	U	ug/L	14.51	43.53	1311/8270D	07/21 14:45	07/22 14:45	AC
Isophorone	U	U	ug/L	15.92	47.76	1311/8270D	07/21 14:45	07/22 14:45	AC
2-Nitrophenol	U	U	ug/L	17.47	52.41	1311/8270D	07/21 14:45	07/22 14:45	AC
2,4-Dimethylphenol	U	U	ug/L	12.50	37.50	1311/8270D	07/21 14:45	07/22 14:45	AC
Bis (2-Chloroethoxy)methane	U	U	ug/L	10.99	32.97	1311/8270D	07/21 14:45	07/22 14:45	AC
2,4-Dichlorophenol	U	U	ug/L	18.81	56.43	1311/8270D	07/21 14:45	07/22 14:45	AC
1,2,3-Trichlorobenzene	U	U	ug/L	3.20	9.60	1311/8270D	07/21 14:45	07/22 14:45	AC
1,2,4-Trichlorobenzene	U	U	ug/L	15.75	47.25	1311/8270D	07/21 14:45	07/22 14:45	AC
Naphthalene	6.61		ug/L	0.02	0.06	1311/8270D	07/21 14:45	07/22 14:45	AC
Hexachlorobutadiene	U	U	ug/L	11.64	34.92	1311/8270D	07/21 14:45	07/22 14:45	AC
4-Chloro-3-Methylphenol	U	U	ug/L	17.48	52.44	1311/8270D	07/21 14:45	07/22 14:45	AC
1-Methylnaphthalene	2.55		ug/L	0.36	1.08	1311/8270D	07/21 14:45	07/22 14:45	AC
2-Methylnaphthalene	3.47		ug/L	0.02	0.06	1311/8270D	07/21 14:45	07/22 14:45	AC
Hexachlorocyclopentadiene	U	U	ug/L	1.72	5.16	1311/8270D	07/21 14:45	07/22 14:45	AC
2,3,6-Trichlorophenol	U	U	ug/L	2.50	7.50	1311/8270D	07/21 14:45	07/22 14:45	AC
2,4,5-Trichlorophenol	U	U	ug/L	17.05	51.15	1311/8270D	07/21 14:45	07/22 14:45	AC
2,4,6-Trichlorophenol	U	U	ug/L	16.62	49.86	1311/8270D	07/21 14:45	07/22 14:45	AC

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### LABORATORY ANALYSIS REPORT

PARAMETER	RESULT	QC	UNITS	MDL	PQL	METHOD	DATE EXT.	DATE ANALY.	ANALYST
2-Chloronaphthalene	U	U	ug/L	15.91	47.73	1311/8270D	07/21 14:45	07/22 14:45	AC
Dimethyl Phthalate	U	U	ug/L	16.23	48.69	1311/8270D	07/21 14:45	07/22 14:45	AC
Acenaphthylene	U	U	ug/L	0.02	0.06	1311/8270D	07/21 14:45	07/22 14:45	AC
2,6-Dinitrotoluene	U	U	ug/L	14.51	43.53	1311/8270D	07/21 14:45	07/22 14:45	AC
Acenaphthene	U	U	ug/L	0.02	0.06	1311/8270D	07/21 14:45	07/22 14:45	AC
2,4-Dinitrophenol	U	U	ug/L	0.80	2.40	1311/8270D	07/21 14:45	07/22 14:45	AC
2,4-Dinitrotoluene	U	U	ug/L	18.21	54.63	1311/8270D	07/21 14:45	07/22 14:45	AC
4-Nitrophenol	U	U	ug/L	1.70	5.10	1311/8270D	07/21 14:45	07/22 14:45	AC
Diethyl Phthalate	U	U	ug/L	11.65	34.95	1311/8270D	07/21 14:45	07/22 14:45	AC
Fluorene	U	U	ug/L	0.012	0.036	1311/8270D	07/21 14:45	07/22 14:45	AC
4-Chlorophenyl Phenyl Ether	U	U	ug/L	18.33	54.99	1311/8270D	07/21 14:45	07/22 14:45	AC
4,6-Dinitro-2-Methylphenol	U	U	ug/L	1.67	5.01	1311/8270D	07/21 14:45	07/22 14:45	AC
N-Nitrosodiphenylamine	U	U	ug/L	13.34	40.02	1311/8270D	07/21 14:45	07/22 14:45	AC
4-Bromophenyl Phenyl Ether	U	U	ug/L	14.10	42.30	1311/8270D	07/21 14:45	07/22 14:45	AC
Hexachlorobenzene	U	U	ug/L	10.60	31.80	1311/8270D	07/21 14:45	07/22 14:45	AC
Pentachlorophenol	U	U	ug/L	2.13	6.39	1311/8270D	07/21 14:45	07/22 14:45	AC
Phenanthrene	U	U	ug/L	14.530	43.590	1311/8270D	07/21 14:45	07/22 14:45	AC
Anthracene	U	U	ug/L	0.049	0.147	1311/8270D	07/21 14:45	07/22 14:45	AC

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### LABORATORY ANALYSIS REPORT

PARAMETER	RESULT	QC	UNITS	MDL	PQL	METHOD	DATE EXT.	DATE ANALY.	ANALYST
Di-N-Butyl Phthalate	U	U	ug/L	15.76	47.28	1311/8270D	07/21 14:45	07/22 14:45	AC
Fluoranthene	U	U	ug/L	0.025	0.075	1311/8270D	07/21 14:45	07/22 14:45	AC
Benzidine	U	U	ug/L	6.53	19.59	1311/8270D	07/21 14:45	07/22 14:45	AC
Pyrene	U	U	ug/L	0.017	0.051	1311/8270D	07/21 14:45	07/22 14:45	AC
Butyl Benzyl Phthalate	U	U	ug/L	17.50	52.50	1311/8270D	07/21 14:45	07/22 14:45	AC
Benzo(A)Anthracene	U	U	ug/L	2.30	6.90	1311/8270D	07/21 14:45	07/22 14:45	AC
3,3-Dichlorobenzidine	U	U	ug/L	10.96	32.88	1311/8270D	07/21 14:45	07/22 14:45	AC
Chrysene	U	U	ug/L	0.75	2.25	1311/8270D	07/21 14:45	07/22 14:45	AC
Bis (2 Ethylhexyl) Phthalate	U	U	ug/L	23.69	71.07	1311/8270D	07/21 14:45	07/22 14:45	AC
Di-N-Octyl Phthalate	U	U	ug/L	17.66	52.98	1311/8270D	07/21 14:45	07/22 14:45	AC
Benzo(B)Fluoranthene	U	U	ug/L	4.12	12.36	1311/8270D	07/21 14:45	07/22 14:45	AC
Benzo(K)Fluoranthene	U	U	ug/L	0.025	0.075	1311/8270D	07/21 14:45	07/22 14:45	AC
Benzo(A)Pyrene	U	U	ug/L	0.017	0.051	1311/8270D	07/21 14:45	07/22 14:45	AC
Indeno(1,2,3-CD)Pyrene	U	U	ug/L	3.10	9.30	1311/8270D	07/21 14:45	07/22 14:45	AC
Dibenzo(A,H,)Anthracene	U	U	ug/L	2.42	7.26	1311/8270D	07/21 14:45	07/22 14:45	AC
Benzo(G,H,I)Perylene	U	U	ug/L	0.017	0.051	1311/8270D	07/21 14:45	07/22 14:45	AC
Bis-2-ethylhexyl Adipate	U	U	ug/L	0.760	2.280	1311/8270D	07/21 14:45	07/22 14:45	AC
Aldrin	U	U	ug/L	0.017	0.051	1311/8270D	07/21 14:45	07/22 14:45	AC

Report To:  
Megan Skeen  
Phoslab Environmental Svcs Inc  
806 West Beacon Road  
Lakeland, FL 33803

Page 12 of 14  
Report Printed: 07/26/10  
Submission # 1007000440  
Order # 25477

Project: Annual Compliance / 071510.011  
Site Location: Annual Compliance / 071510.011  
Matrix: Soils/Sediments

Sample I.D.: WWTS  
Collected: 07/14/10 10:30  
Received: 07/17/10 10:00  
Collected by: Client

### LABORATORY ANALYSIS REPORT

PARAMETER	RESULT	QC	UNITS	MDL	PQL	METHOD	DATE EXT.	DATE ANALY.	ANALYST
$\alpha$ -BHC "	U	U	ug/L	0.03	0.09	1311/8270D	07/21 14:45	07/22 14:45	AC
$\beta$ -BHC "	U	U	ug/L	0.03	0.09	1311/8270D	07/21 14:45	07/22 14:45	AC
$\sigma$ -BHC "	U	U	ug/L	0.03	0.09	1311/8270D	07/21 14:45	07/22 14:45	AC
$\gamma$ -BHC (Lindane) "	U	U	ug/L	0.004	0.012	1311/8270D	07/21 14:45	07/22 14:45	AC
Cresol "	U	U	ug/L	1.5	4.5	1311/8270D	07/21 14:45	07/22 14:45	AC
Endrin "	U	U	ug/L	0.186	0.558	1311/8270D	07/21 14:45	07/22 14:45	AC
Heptachlor "	U	U	ug/L	0.78	2.34	1311/8270D	07/21 14:45	07/22 14:45	AC
Heptachlor Epoxide "	U	U	ug/L	1.68	5.04	1311/8270D	07/21 14:45	07/22 14:45	AC
Chlordane "	U	U	ug/L	1.0	3.0	1311/8270D	07/21 14:45	07/22 14:45	AC
4,4'-DDD "	U	U	ug/L	0.63	1.89	1311/8270D	07/21 14:45	07/22 14:45	AC
4,4'-DDE "	U	U	ug/L	0.39	1.17	1311/8270D	07/21 14:45	07/22 14:45	AC
4,4'-DDT "	U	U	ug/L	0.69	2.07	1311/8270D	07/21 14:45	07/22 14:45	AC
Dieldrin "	U	U	ug/L	0.840	2.520	1311/8270D	07/21 14:45	07/22 14:45	AC
Endosulfan I "	U	U	ug/L	0.006	0.018	1311/8270D	07/21 14:45	07/22 14:45	AC
Endosulfan II "	U	U	ug/L	0.006	0.018	1311/8270D	07/21 14:45	07/22 14:45	AC
Endosulfan Sulfate "	U	U	ug/L	0.007	0.021	1311/8270D	07/21 14:45	07/22 14:45	AC
Endrin Aldehyde "	U	U	ug/L	0.190	0.570	1311/8270D	07/21 14:45	07/22 14:45	AC
Toxaphene "	U	U	ug/L	0.90	2.70	1311/8270D	07/21 14:45	07/22 14:45	AC

Report To:  
Megan Skeen  
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Page 13 of 14  
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Project: Annual Compliance / 071510.011  
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Sample I.D.: WWTS  
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### LABORATORY ANALYSIS REPORT

PARAMETER	RESULT	QC	UNITS	MDL	PQL	METHOD	DATE EXT.	DATE ANALY.	ANALYST
PCB-1016 -	U	U	ug/L	0.30	0.90	1311/8270D	07/21 14:45	07/22 14:45	AC
PCB-1221 -	U	U	ug/L	0.30	0.90	1311/8270D	07/21 14:45	07/22 14:45	AC
PCB-1232 -	U	U	ug/L	0.30	0.90	1311/8270D	07/21 14:45	07/22 14:45	AC
PCB-1242 -	U	U	ug/L	0.30	0.90	1311/8270D	07/21 14:45	07/22 14:45	AC
PCB-1248 -	U	U	ug/L	0.30	0.90	1311/8270D	07/21 14:45	07/22 14:45	AC
PCB-1254 -	U	U	ug/L	0.30	0.90	1311/8270D	07/21 14:45	07/22 14:45	AC
PCB-1260 -	U	U	ug/L	0.30	0.90	1311/8270D	07/21 14:45	07/22 14:45	AC
Dioxin (Screen)	U	U	ug/L	0.03	0.09	1311/8270D	07/21 14:45	07/22 14:45	AC
Azobenzene -	U	U	ug/L	0.75	2.25	1311/8270D	07/21 14:45	07/22 14:45	AC
Methoxychlor -	U	U	ug/L	0.007	0.021	1311/8270D	07/21 14:45	07/22 14:45	AC
Benzoic Acid	U	U	ug/L	0.84	2.52	1311/8270D	07/21 14:45	07/22 14:45	AC
Aniline	U	U	ug/L	8.49	25.47	1311/8270D	07/21 14:45	07/22 14:45	AC
4-Chloroaniline	U	U	ug/L	14.28	42.84	1311/8270D	07/21 14:45	07/22 14:45	AC
Dibenzofuran	U	U	ug/L	17.38	52.14	1311/8270D	07/21 14:45	07/22 14:45	AC
2-Nitroaniline	U	U	ug/L	15.58	46.74	1311/8270D	07/21 14:45	07/22 14:45	AC
3-Nitroaniline	U	U	ug/L	21.73	65.19	1311/8270D	07/21 14:45	07/22 14:45	AC
4-Nitroaniline	U	U	ug/L	19.94	59.82	1311/8270D	07/21 14:45	07/22 14:45	AC
Carbazole -	U	U	ug/L	0.68	2.04	1311/8270D	07/21 14:45	07/22 14:45	AC

Report To:  
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Page 14 of 14  
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Sample I.D.: WWTS  
Collected: 07/14/10 10:30  
Received: 07/17/10 10:00  
Collected by: Client

### LABORATORY ANALYSIS REPORT

PARAMETER	RESULT	QC	UNITS	MDL	PQL	METHOD	DATE EXT.	DATE ANALY.	ANALYST
2,6-Dichlorophenol	U	U	ug/L	16.6	49.8	1311/8270D	07/21 14:45	07/22 14:45	AC
2,3,4,6-Tetrachlorophenol	U	U	ug/L	15.87	47.61	1311/8270D	07/21 14:45	07/22 14:45	AC
2,3,5,6-Tetrachlorophenol	U	U	ug/L	0.97	2.91	1311/8270D	07/21 14:45	07/22 14:45	AC
Pyridine	U	U	ug/L	2.09	6.27	1311/8270D	07/21 14:45	07/22 14:45	AC

Unless indicated, soil results are reported based on actual (wet) weight basis.

Analytes not currently NELAC certified denoted by -.  
Work performed by outside (subcontract) labs denoted by Cert.ID in Analyst Field.  
Results relate only to this sample.  
QC=Qualifier Codes as defined by DEP 62-160  
U=Analyzed for but not detected.  
Q=Sample held beyond accepted holding time.  
I=Value is between MDL and PQL.  
J=Estimated value.

  
Authorized CSM Signature (954) 978-6400  
Florida-Spectrum Environmental Services, Inc.  
Certification # E86006



806 West Beacon Road  
Lakeland, Florida 33803-2847  
Phone: 863-682-5897  
Fax: 863-683-3279  
FDEP CompQAP No: 870308G  
FDOH ID#: E84925

[illegible]



## Honey, Kelly

---

**From:** Richard Dillen [rdillen@howcousa.com]  
**Sent:** Wednesday, August 11, 2010 11:01 AM  
**To:** Honey, Kelly  
**Cc:** Lee Morris  
**Subject:** RE: loose spent lamp

The spent fluorescent tube was placed in box with other spent tubes marked "Spent Fluorescent Tubes" and sealed. I'm actually going to Pinellas County Haz Waste collection today! Will forward you the receipt when I return to the Lab.

---

**From:** Honey, Kelly [mailto:Kelly.Honey@dep.state.fl.us]  
**Sent:** Wednesday, August 11, 2010 9:48 AM  
**To:** Richard Dillen  
**Cc:** Lee Morris  
**Subject:** FW: loose spent lamp

Hi Richard,

I need to finish my report, so I am going to assume that HOWCO has corrected this issue. If it has not, please ensure it is corrected. Thanks!

-kelly

*The Department of Environmental Protection values your feedback as a customer. DEP Secretary Michael W. Sole is committed to continuously assessing and improving the level and quality of services provided to you. Please take a few minutes to comment on the quality of service you received. Simply click on [this link to the DEP Customer Survey](#). Thank you in advance for completing the survey.*

**From:** Honey, Kelly  
**Sent:** Tuesday, August 10, 2010 3:14 PM  
**To:** 'Richard Dillen'  
**Cc:** 'Lee Morris'  
**Subject:** loose spent lamp

Richard,

When I was there, there was a single spent lamp in the vehicle maintenance area that was not in a labeled container. (actually it was in the little room near the maintenance area behind the lab) Could you please confirm that this lamp has been placed into a closed, labeled box, or that it has been properly disposed/recycled?

Thanks!  
-kelly

Inserted into OCULUS

OCT 19 2011

Initials: RVB

## DOCUMENTS AND RECORDKEEPING

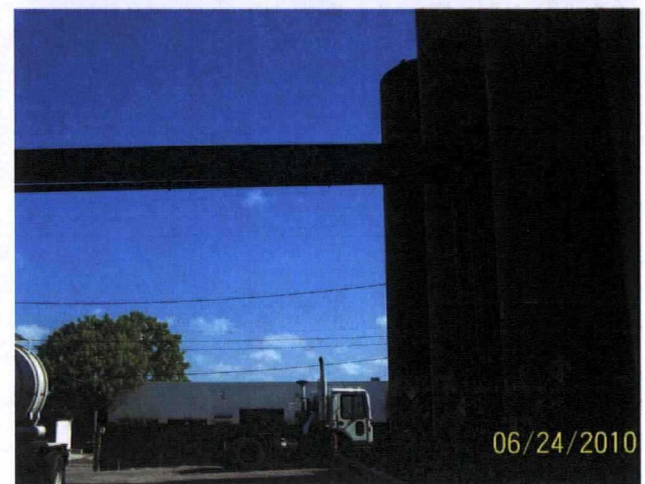
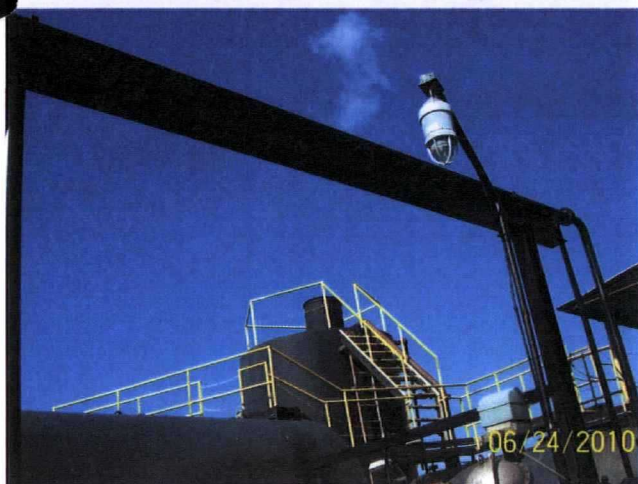
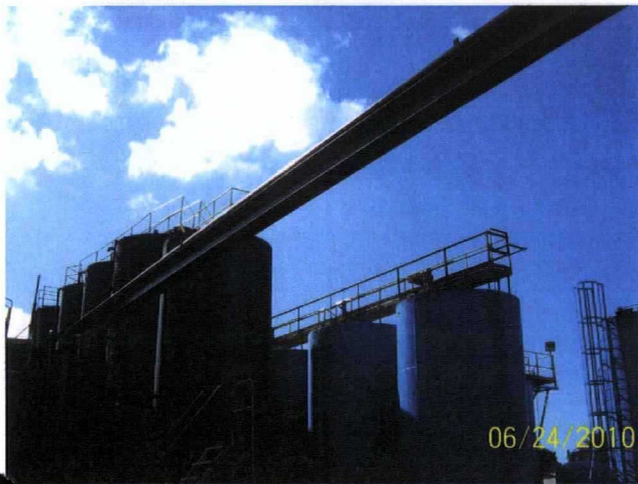
<input checked="" type="checkbox"/> Permit Application.	<input checked="" type="checkbox"/> Operating Permit.
<input checked="" type="checkbox"/> Validated Annual Used Oil Registration [Form 62-701.900(13)] <i>exp. 6/30/10</i>	<input type="checkbox"/> Annual Used Oil Recovery Report. <input checked="" type="checkbox"/>
<input checked="" type="checkbox"/> Annual DEP Registration Placard For Storage Tanks. <i>exp 6/11</i>	<input checked="" type="checkbox"/> Contingency Plan. <i>- need address &amp; E.C.s.</i>
<input checked="" type="checkbox"/> Training Logs. <i>no</i>	<input checked="" type="checkbox"/> Closure Plan.
<input type="checkbox"/> Results of Annual Waste Analyses For All Solid Waste Streams <i>Disposed. still ok</i>	<input type="checkbox"/> Annual Closure Cost Update <i>2-18-10 \$101,825.12</i>
<input type="checkbox"/> Results of Annual Waste Analyses For All Solid Waste Streams <i>Received From Generators. no</i>	<input type="checkbox"/> Transporter Liability Insurance [\$100,000 minimum]. <i>1 mil/2 mil</i>
<input checked="" type="checkbox"/> Processed Oil Sampling Logs [Minimum Of One Sample Every Two Weeks].	<input type="checkbox"/> Monthly Inspection Logs Of The Solids Storage and Sludge Separation Areas.
<input checked="" type="checkbox"/> Tank Inspections and Monthly Release Detection Monitoring.	<input type="checkbox"/> Annual Analyses Of WWT and OES Sludges.
<input type="checkbox"/> Analysis Of Vibrascreen Filter Solids and Tank Bottom Sludges [Unless Processed In Tanks 110 or 111].	<input type="checkbox"/> Generator Non-Haz Demonstration For Used Antifreeze - <i>N/A now recycled</i>
<input type="checkbox"/> Documentation Of Annual Closure Cost Estimate [Solid Waste Processing] - N/A <i>Now part of UOP closing costs estimate</i>	<input type="checkbox"/> Records Of Refused Used Oil Shipments <i>N/A all field screened - no shipments refused at facilities</i>
<input type="checkbox"/> Records Of Quantities Of Waste Received, Stored, Processed and Disposed. <i>emailing</i>	<input type="checkbox"/> Documentation Of Annual Financial Assurance [Solid Waste Processing] - N/A
<input checked="" type="checkbox"/> Records Of Disposal Or Treatment Facility For All Solid Wastes Removed [Name and Location]. <i>no</i>	<input type="checkbox"/> Quarterly Submittals Of Material Balance Of Quantities Of Solid Waste. - N/A
<input type="checkbox"/> Copies Of Permits For Facilities Receiving Processed Wastes. <i>- USA Waste (decholes)</i>	<input checked="" type="checkbox"/> Monthly Solid Waste Inspection / Corrective Actions Logs.
<input checked="" type="checkbox"/> Monthly Inspection Logs Of Safety and Emergency Equipment.	<input checked="" type="checkbox"/> Manifests / Bill-Of-Lading.

CHECK to see if CESQG status sorted into OCULUS

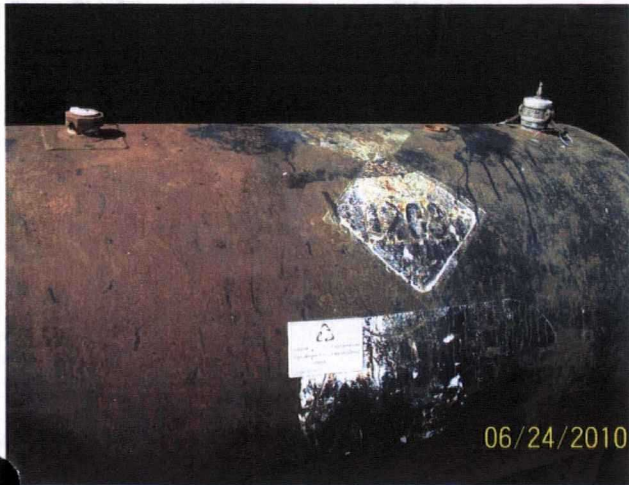
OCT 19 2011

Initials: CLA

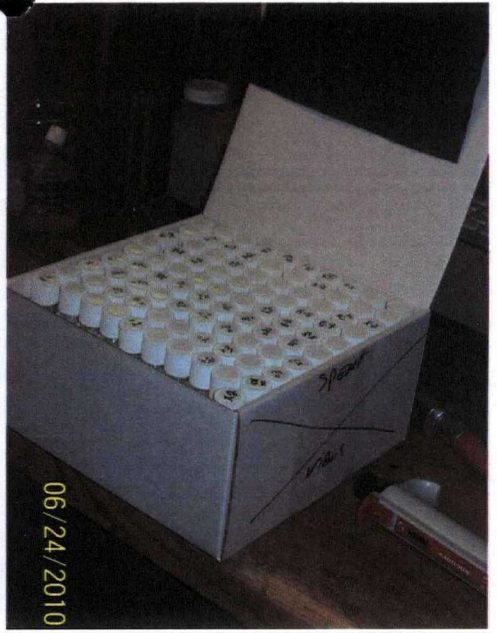
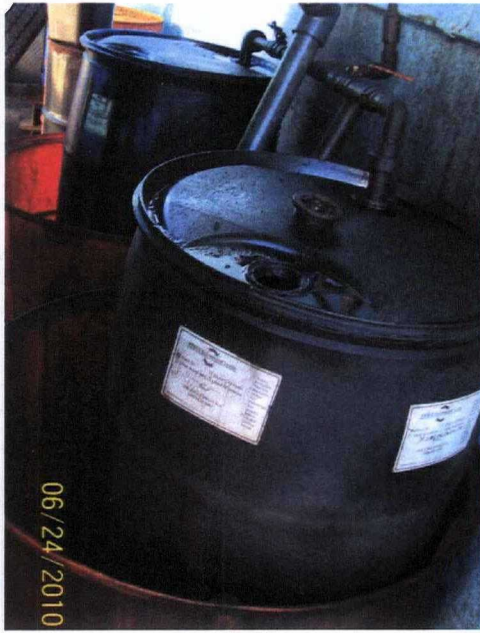
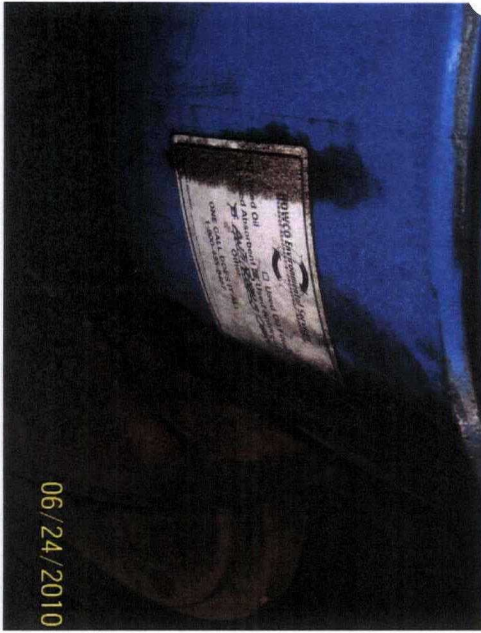








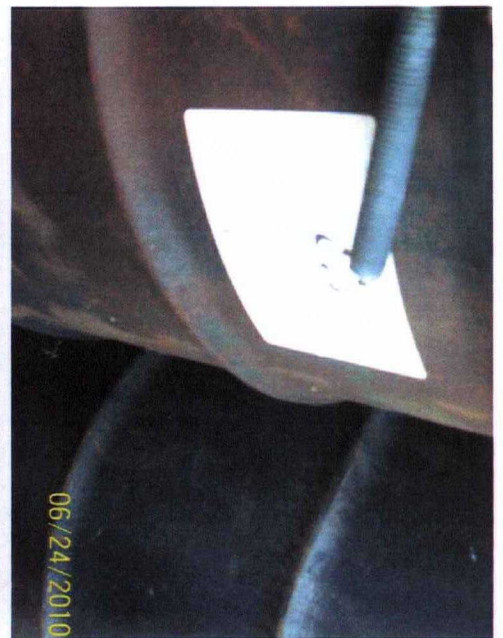
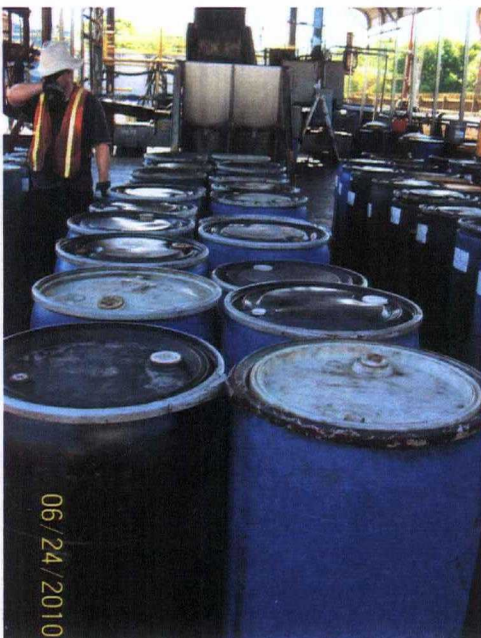
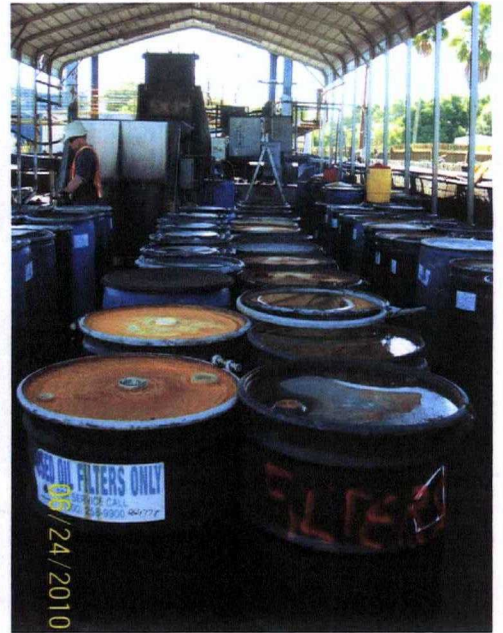
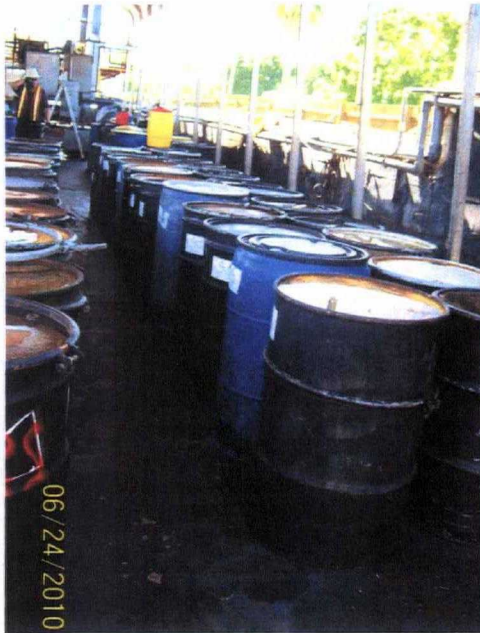
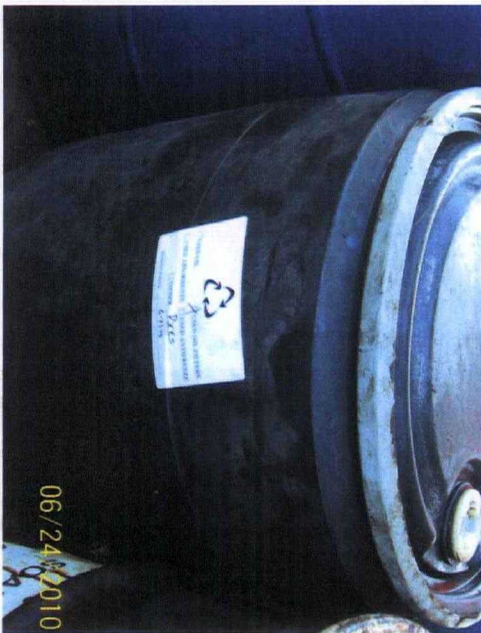
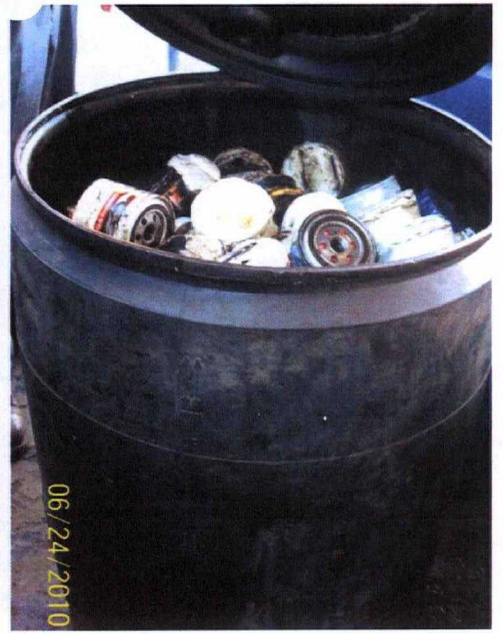
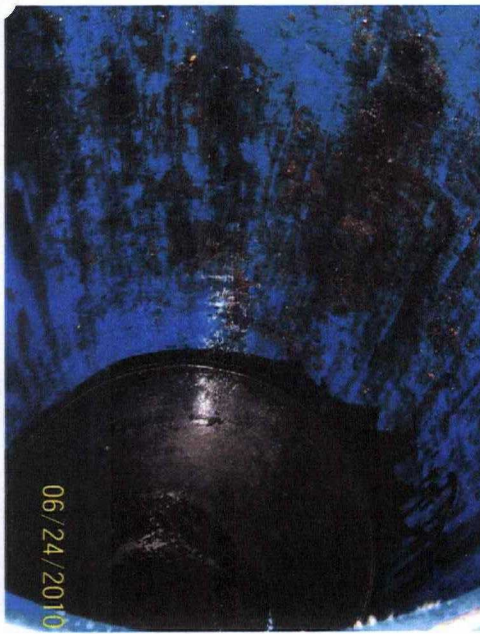






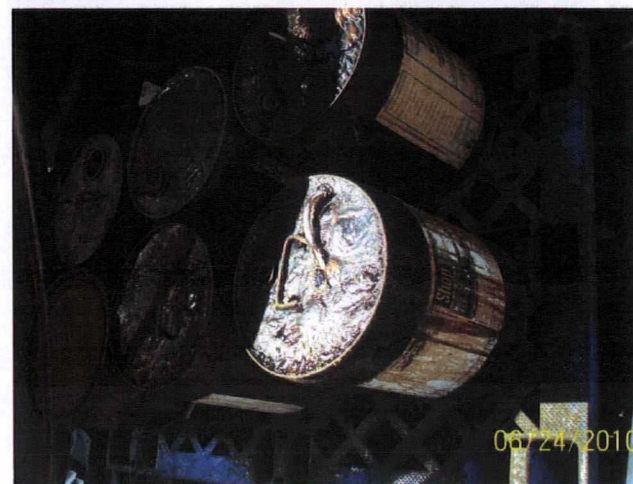






HOWCO (FLD 152 764 767); 06-24-10 - Photos by Shannon Camp, ES III



[illegible]

ENVIRONMENTAL SERVICES  
MONTHLY INSPECTION AND RELEASE DETECTION FORM

PROPERTY	INSPECTION DATE	INSPECTION TIME	INSPECTOR	DATE COMPLETED	INSPECTION BY
INDUSTRIAL WASTE TREATMENT - June 2011	06/20/2011	10:00 AM	ADRIAN YERGEN	06/20/2011	ADRIAN YERGEN
TECH DESCRIPTION	WASTE TREATMENT FACILITY				
1. WASTE TREATMENT	10				
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78. WASTE TREATMENT	10				





**Honey, Kelly**

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**From:** Honey, Kelly  
**Sent:** Thursday, December 24, 2009 4:14 PM  
**To:** 'Randall\_Strauss@doh.state.fl.us'  
**Cc:** Dregne, James; 'Joseph\_Sowers@doh.state.fl.us'; Meetze, Alison; Culbreth, Laurel; Knauss, Elizabeth  
**Subject:** RE: Howco 8624557

Hi Randy,

The sludge drying area / solid waste processing pad is designated as a containment area, but in the application it says the volume is "N/A" because there are no regulated storage tanks. (It says the same thing for the water treatment tanks' containment area.)

It is my understanding that we have allowed them to use the fluid capturing system in this area as secondary containment, but to my recollection, it hasn't come up as an issue during any of my inspections. I suppose it could have been formally negotiated in an Order or something, but I don't think so. I think it's been more of an understanding that any spilled fluids would be collected for processing and that the system could handle it. Jim will be back from vacation next Monday (01/04/10), and he's more knowledgeable about the facility than I am. Frankly, after reviewing their permit this afternoon, I want to discuss it with him myself to make sure we (i.e., the Department) are okay with them using this area as a transfer area, and that we are okay with its designation as a containment area without them providing a volume or capacity of the fluid collection system.

Let me know if you need any more info. I will be around for a while today, but I will be on vacation all next week.

-kelly

---

**From:** Randall\_Strauss@doh.state.fl.us [mailto:Randall\_Strauss@doh.state.fl.us]  
**Sent:** Thursday, December 24, 2009 3:30 PM  
**To:** Honey, Kelly  
**Cc:** Dregne, James; Joseph\_Sowers@doh.state.fl.us; Meetze, Alison; Culbreth, Laurel; Knauss, Elizabeth  
**Subject:** RE: Howco 8624557

Inserted into OCULUS

OCT 19 2011

Initials: 

Kelly,

The tankers are located in the area labeled "Sludge Drying Bed #2" - I take from your discussion that this area "maybe" meets your requirements for secondary containment? I seem to remember that this area may meet some solid waste definition of containment (or perhaps it was negotiated in a CO and/or granted an Alternate Procedure) because it directs any liquid to a collection sump where it is then pumped to the plant that is contained - perhaps that is why a containment volume is not specified?

Randy

---

**From:** Honey, Kelly [mailto:Kelly.Honey@dep.state.fl.us]  
**Sent:** Thursday, December 24, 2009 2:57 PM  
**To:** Strauss, Randall  
**Cc:** Dregne, James; Sowers, Joseph; Meetze, Alison; Culbreth, Laurel; Knauss, Elizabeth  
**Subject:** RE: Howco 8624557

## Honey, Kelly

---

**From:** Randall\_Strauss@doh.state.fl.us  
**Sent:** Thursday, December 24, 2009 3:30 PM  
**To:** Honey, Kelly  
**Cc:** Dregne, James; Joseph\_Sowers@doh.state.fl.us; Meetze, Alison; Culbreth, Laurel; Knauss, Elizabeth  
**Subject:** RE: Howco 8624557

Kelly,

The tankers are located in the area labeled "Sludge Drying Bed #2" - I take from your discussion that this area "maybe" meets your requirements for secondary containment? I seem to remember that this area may meet some solid waste definition of containment (or perhaps it was negotiated in a CO and/or granted an Alternate Procedure) because it directs any liquid to a collection sump where it is then pumped to the plant that is contained - perhaps that is why a containment volume is not specified?

Randy

---

**From:** Honey, Kelly [mailto:Kelly.Honey@dep.state.fl.us]  
**Sent:** Thursday, December 24, 2009 2:57 PM  
**To:** Strauss, Randall  
**Cc:** Dregne, James; Sowers, Joseph; Meetze, Alison; Culbreth, Laurel; Knauss, Elizabeth  
**Subject:** RE: Howco 8624557

Inserted into OCULUS

OCT 19 2011

Initials: KIA

Randy,

Between the fence on the south side and the "collector channel," there are two separate areas: the used oil filter processing and container storage area to the east and the sludge drying area (AKA the solid waste processing pad) to the west, next to the diked sludge separation area. The collector channel runs the entire length, and should collect fluids from both areas, but the current permit only designates the sludge drying side a "containment area." Note that there is a discrepancy between the sketch in the permit, which appears to be a diagram that was replaced during the application process, and diagram in the application. The permit diagram indicates that the area to the west includes used oil drum storage, not sludge drying. Technically, the permit would take precedence over the application, but in this case, I'm not sure since the replaced sketch was used for the containment calculations....

Our rule does not require used oil filters to be in containment, only on an impervious surface. Additionally, the permit requires that oily wastes be stored and processed only on the pad.

I think that in the past, we have agreed that the area between the channel and the fence could be used to temporarily park used oil trucks on the pad to await unloading and meet the transfer facility requirements for containment, but I couldn't actually find that written anywhere in the permit or application. That doesn't mean it isn't there, though!

As you can see from the attached, in the containment calculations provided by HOWCO, there is no volume given for the sludge drying side. Apparently we accepted their designation of the area as "containment" even without a given volume. I guess I would ask them for the capacity of the "collector channel" system and go from there.

**Honey, Kelly**

---

**From:** Honey, Kelly  
**Sent:** Thursday, December 24, 2009 3:10 PM  
**To:** Dregne, James  
**Cc:** Knauss, Elizabeth  
**Subject:** RE: Howco 8624557

Jim,

I just responded to Randy, but I there was an issue unrelated to the Tanks program I wanted to raise. I can't find anything in HOWCO's permit that allows them to blend off-spec fuels from offsite (or any fuel) as part of their used oil processing. The permit states that they will process the used oil either by distillation or chemical separation, and the only mention of adding anything is "demulsification chemical may be injected and mixed into the used oil." The only mention of blending is that the recovered "light ends are blended into processed used oil tanks during batch processing."

So I think they may be in violation of their permit.

I just wanted to bring it up before I went on leave and forgot all about it. I copied Beth on everything in case Randy has questions or whatever, someone else here will know what he's talking about...

See you in a couple of weeks!

-kelly

Inserted into OCULUS

OCT 19 2011

Initials: KA

---

**From:** Dregne, James  
**Sent:** Thursday, December 24, 2009 11:47 AM  
**To:** Honey, Kelly  
**Subject:** Fw: Howco 8624557

Fya

---

**From:** Randall\_Strauss@doh.state.fl.us  
**To:** Culbreth, Laurel  
**Cc:** Dregne, James; Meetze, Alison; Joseph\_Sowers@doh.state.fl.us  
**Sent:** Thu Dec 24 11:42:59 2009  
**Subject:** Howco 8624557  
Laurel,

I inspected Howco yesterday and discovered they are using 4 unlicensed tanker trailers to store petroleum products. One is storing off-spec Jet A that they intend to blend into their UO fuel and it is not in containment. The other three are in the used oil filter/solid waste management area, which I believe the Used Oil program has accepted as meeting our secondary containment requirements. These contain respectively off-road diesel, a used oil/kerosene mixture, and light ends (~gasoline) from their cooker process. Ironically, they set-up the off-road diesel tanker to fuel their plant equipment, after they discontinued the use of the DW tank they were using for this purpose due to our enf case.

Anyway, I told the plant manager, Lee Morris, and Richard Dillen, the lab manager, that I interpret the trailers to be stationary storage tanks that can not meet our requirements and they need to discontinue their use immediately. I also told them they will have to do a closure assessment for the trailer that is not in containment, ala Lancaster Oil, but not for the other three, if we can confirm that the filter management area is considered secondary containment. Let me know if this approach sounds good.

**Honey, Kelly**

---

**From:** Honey, Kelly  
**Sent:** Thursday, December 24, 2009 2:57 PM  
**To:** 'Randall\_Strauss@doh.state.fl.us'  
**Cc:** Dregne, James; 'Joseph\_Sowers@doh.state.fl.us'; Meetze, Alison; Culbreth, Laurel; Knauss, Elizabeth  
**Subject:** RE: Howco 8624557  
**Attachments:** HOWCO\_Docs.tif

Randy,

Between the fence on the south side and the "collector channel," there are two separate areas: the used oil filter processing and container storage area to the east and the sludge drying area (AKA the solid waste processing pad) to the west, next to the diked sludge separation area. The collector channel runs the entire length, and should collect fluids from both areas, but the current permit only designates the sludge drying side a "containment area." Note that there is a discrepancy between the sketch in the permit, which appears to be a diagram that was replaced during the application process, and diagram in the application. The permit diagram indicates that the area to the west includes used oil drum storage, not sludge drying. Technically, the permit would take precedence over the application, but in this case, I'm not sure since the replaced sketch was used for the containment calculations....

Our rule does not require used oil filters to be in containment, only on an impervious surface. Additionally, the permit requires that oily wastes be stored and processed only on the pad.

I think that in the past, we have agreed that the area between the channel and the fence could be used to temporarily park used oil trucks on the pad to await unloading and meet the transfer facility requirements for containment, but I couldn't actually find that written anywhere in the permit or application. That doesn't mean it isn't there, though!

As you can see from the attached, in the containment calculations provided by HOWCO, there is no volume given for the sludge drying side. Apparently we accepted their designation of the area as "containment" even without a given volume. I guess I would ask them for the capacity of the "collector channel" system and go from there.

I have attached some documents from the permit application that outline and summarize the "containment areas."

The final permit:

[http://dwmedms.dep.state.fl.us:80/Oculus/servlet/shell?command=getEntity&\[guid=2.126824.1\]&\[profile=Permitting\\_Authorization\]](http://dwmedms.dep.state.fl.us:80/Oculus/servlet/shell?command=getEntity&[guid=2.126824.1]&[profile=Permitting_Authorization])

Let me know if you need anything else.

Sincerely,  
Kelly Honey  
FL Department of Environmental Protection  
RCRA Compliance and Enforcement  
T: 813/632-7600, ext. 369  
F: 813/632-7664

Inserted into OCULUS

OCT 19 2011

Initials: KIA

## **Honey, Kelly**

---

**From:** Dregne, James  
**Sent:** Thursday, December 24, 2009 11:47 AM  
**To:** Honey, Kelly  
**Subject:** Fw: Howco 8624557  
**Attachments:** PC230131.JPG; PC230107.JPG

Fya

---

**From:** Randall\_Strauss@doh.state.fl.us  
**To:** Culbreth, Laurel  
**Cc:** Dregne, James; Meetze, Alison; Joseph\_Sowers@doh.state.fl.us  
**Sent:** Thu Dec 24 11:42:59 2009  
**Subject:** Howco 8624557  
Laurel,

I inspected Howco yesterday and discovered they are using 4 unlicensed tanker trailers to store petroleum products. One is storing off-spec Jet A that they intend to blend into their UO fuel and it is not in containment. The other three are in the used oil filter/solid waste management area, which I believe the Used Oil program has accepted as meeting our secondary containment requirements. These contain respectively off-road diesel, a used oil/kerosene mixture, and light ends (~gasoline) from their cooker process. Ironically, they set-up the off-road diesel tanker to fuel their plant equipment, after they discontinued the use of the DW tank they were using for this purpose due to our enf case.

Anyway, I told the plant manager, Lee Morris, and Richard Dillen, the lab manager, that I interpret the trailers to be stationary storage tanks that can not meet our requirements and they need to discontinue their use immediately. I also told them they will have to do a closure assessment for the trailer that is not in containment, ala Lancaster Oil, but not for the other three, if we can confirm that the filter management area is considered secondary containment. Let me know if this approach sounds good.

Jim – can you confirm whether the used oil filter area, that is the pad area between the trench drain and the outer wall, is considered secondary containment?

### **Randall H Strauss**

Pinellas County Health Dept  
Environmental Health & Preparedness Div  
4175 East Bay Dr  
Clearwater FL 33764  
V 727-538-7277 x1144  
F 727-538-7293  
[randall\\_strauss@doh.state.fl.us](mailto:randall_strauss@doh.state.fl.us)

Inserted into OCULUS

OCT 19 2011

Initials: ICA

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**For up-to-date information about H1N1 Swine Flu visit <http://www.myflusafety.com> or call 877 352 3581**







# Florida Department of Environmental Protection

Southwest District Office  
13051 North Telecom Parkway  
Temple Terrace, Florida 33637-0926

Charlie Crist  
Governor

Jeff Kottkamp  
Lt. Governor

Michael W. Sole  
Secretary

July 24, 2009

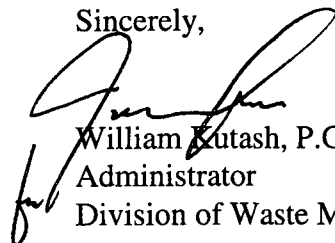
Mr. Tim Hagan  
Hagan Holding Company  
d/b/a HOWCO Environmental Services  
3701 Central Avenue  
St. Petersburg FL 33713

Re: Final Agency Action (Short Form Consent Order)  
HOWCO Environmental Services; EPA ID # FLD 152 764 767  
Pinellas County  
**OGC File No.: 07-1639**

Dear Mr. Hagan:

The Department of Environmental Protection has received your final payment of \$3,500.00 as stipulated by the Order. This enforcement action is now closed. Thank you for your cooperation.

Sincerely,

  
William Kutash, P.G.  
Administrator  
Division of Waste Management

WK/kmh

enclosure

cc: Mike Redig, Department, HWR Section (via electronic mail)  
Alan Annicella, US EPA Region IV (via electronic mail)  
Charles Ryburn, Pinellas County Department of Environmental Management  
✓ Compliance File

# Memorandum

# Florida Department of Environmental Protection

## SOUTHWEST DISTRICT ENFORCEMENT COVER MEMO

TO: JD James Dregne, Hazardous Waste Program Manager *gls*

THROUGH: dk Elizabeth Knauss, HW Enforcement Coordinator

FROM: KA Kelly Honey, Environmental Specialist III

DATE: June 5, 2009

FILE NAME: HOWCO Environmental Services COUNTY: Pinellas

PROGRAM: Hazardous Waste PROJECT # N/A

TYPE OF DOCUMENT: Inspection Report and Cover Letter

REQUESTED ACTION: Approval

### DESCRIPTION OF VIOLATIONS:

The facility failed to update its plan with the current emergency coordinators, had one small container of used oil that was unlabeled, and did not have adequate aisle space around its drums of used oil filters. This inspection was performed jointly with the USEPA.

### STATUS OF CORRECTIVE ACTIONS:

The violations have been corrected.

### STATUS OF PENALTY ASSESSMENT:

N/A

PENALTY: ☒ Not Applicable

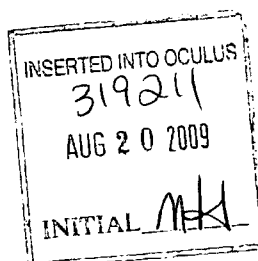
Amount: N/A

Costs & Expenses: N/A

Total: N/A

Secretary Approval ☒ Not required / Approved on \_\_\_\_\_

Attachments: Inspection report and cover letter





# Florida Department of Environmental Protection

Southwest District Office  
13051 North Telecom Parkway  
Temple Terrace, Florida 33637-0926

Charlie Crist  
Governor

Jeff Kottkamp  
Lt. Governor

Michael W. Sole  
Secretary

June 9, 2009

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

**Re: HOWCO Environmental Services  
EPA ID # FLD 152 764 767  
Pinellas County**

Dear Mr. Hagan:

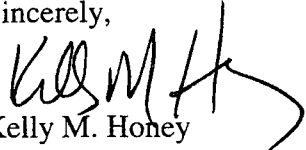
A hazardous waste program field inspection led by the US Environmental Protection Agency (USEPA) was conducted at the above referenced facility on April 23, 2009.

Enclosed is the Department's inspection report generated from this visit. Based upon the information gathered during the inspection, HOWCO Environmental Services, was found to be in violation of regulations governing used oil processors. These violations are set forth in the "Summary of Violations" section of the inspection report.

Subsequent review of documentation provided by you indicates that all the violations cited in the "Summary of Violations" have been corrected. Having returned to compliance, no enforcement action will be taken

If you have any questions, please feel free to call me at (813) 632-7600, extension 369.

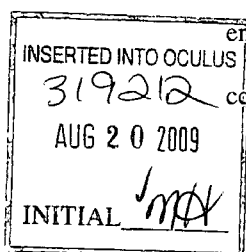
Sincerely,

  
Kelly M. Honey  
Environmental Specialist III  
Division of Waste Management  
Southwest District

JD/kmh

enclosure

cc: Charles Ryburn, Pinellas County SQG Program  
Brian Gross, USEPA Region IV





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

**FACILITY INFORMATION:**

**Facility Name:** Howco Environmental Services  
**On-Site Inspection Start Date:** 04/23/2009      **On-Site Inspection End Date:** 04/23/2009  
**ME ID#:** 1038      **EPA ID#:** FLD152764767  
**Facility Street Address:** 843 43rd St S, St Petersburg, Florida 33711-1922  
**Contact Mailing Address:** 843 43rd St S, St Petersburg, Florida 33711-1922  
**County Name:** Pinellas      **Contact Phone:** (727) 327-8467

**NOTIFIED AS:**

SQG (100-1000 kg/month)

**INSPECTION TYPE:**

Permitting Inspection for Used Oil Processor facility  
Routine Inspection for Used Oil Transporter facility  
Routine Inspection for Used Oil Marketer facility  
Routine Inspection for Used Oil Generator facility  
Routine Inspection for CESQG (<100 kg/month) facility

**INSPECTION PARTICIPANTS:**

**Principal Inspector:** Kelly M. Honey, Environmental Specialist III  
**Other Participants:** Richard Dillen, Quality Assurance Officer; Brian Gross, Environmental Scientist; Lee Morris, Director of Operations

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

**SIC CODE:** 2999 - Manufacturing - petroleum and coal products, nec

**TYPE OF OWNERSHIP:** Private

**Introduction:**

HOWCO Environmental Services (HOWCO) was jointly inspected by the United States Environmental Protection Agency (USEPA) and the Florida Department of Environmental Protection (Department) to evaluate the facility's compliance with state and federal hazardous waste regulations. Brian Gross, Environmental Scientist, led the inspection on behalf of the USEPA. The inspectors were accompanied throughout by Richard Dillen, who manages the Laboratory, and Lee Morris, who manages the Yard. The facility was last inspected by the Department on August 15, 2008. HOWCO has a used oil processing permit issued by the Department on July 7, 2007.

**Process Description:**

HOWCO stores, processes and markets used oil and is a registered used oil filter transporter and processor, as well. Additionally, HOWCO accepts oily waste solids which are processed and solidified prior to disposal. As a result of the lab wastes generated during QA testing, HOWCO is also a conditionally exempt small quantity generator of hazardous waste (CESQG). The processes at the facility have not changed since the previous inspection. During this inspection, the Department had the opportunity to inspect one of HOWCO's transport vehicles that was not currently on the road, and it was found to be equipped with used oil testing kits and emergency equipment, such as fire extinguishers.

HazMat supplies are stored in one of three large trailers on the south side of the property. The contents of the HazMat trailer included drums of fire suppression foam, as well as spill control equipment. During the inventory of this equipment, it was determined that some of the Tyvek

Inspection Date: 04/23/2009

suits referenced on HOWCO's inventory list were significantly deteriorated. It is recommended that HOWCO inspect these items more frequently to ensure that there is a full inventory of emergency response equipment, as required by Part I.14(c) of its permit. One of the facility's bullhorns was tested and found to be operable. The fire and emergency equipment are inspected monthly and tested annually.

At the time of this inspection, HOWCO was in the process of replacing its condenser unit, and therefore, no used oil processing was occurring. HOWCO was also taking the opportunity while the system was down to replace some pumps, valves, etc. There was some used oil observed around these work areas, but overall, the secondary containment was found to be free of used oil and stormwater. There were two 20-cubic yard rollofs near the WTU sludge processing tanks that contained sludges removed from the cooker tanks. The rollofs were labeled and covered. Used oil was observed in the rollofs, and staff said that it seeps from the sludge, rises to the surface and is transferred to the processing storage tanks daily using a vacuum truck. When all the free liquid is removed from the sludge, it will be taken to Pinellas County's Waste-to-Energy facility for incineration after being solidified with mulch provided by the County for this purpose.

It was observed that although the yard was much cleaner than in previous inspections, there were several areas where the asphalt was completely deteriorated and lifting off in chunks. It was also observed that a large part of the yard was blocked off with cones, and Mr. Morris said that HOWCO was getting the yard recoated with asphalt. Tampa Paving Constructors has been contracted to recoat the rear portion of the yard from the washing area to the filter block loading bay. It was noted that some of the deteriorated asphalt was outside this specified area, and Mr. Morris was directed to please recoat all suspect areas of the yard. When the Department returned to the facility to review records on 05-27-09, it was observed that the yard still had not been recoated. Given the extremely poor condition of some sections of the asphalt, HOWCO needs to recoat the yard as soon as possible.

Because much of the yard had been emptied due to the planned recoating, the used oil filter processing and oily waste storage areas were somewhat overcrowded. At the time of the inspection, there were approximately 85 drums of used oil filters in storage with inadequate room to walk around or read the labels on these drums. This is a violation of Part I.14(e) of HOWCO's permit, which requires the facility to maintain aisle space sufficient to inspect drums and read labels. HOWCO personnel began rearranging the drums during the inspection. Crushed used oil filters are shipped to a smelter. Used oil collected in the crushing unit is transferred to tank #109.

There were additional drums in the staging area storing absorbents, gloves and other oily solid waste, as well as 13 drums of used hydraulic oil received from Clean Harbors located nearby on the solid waste pad. There was more room around the drums, however, it is recommended that HOWCO improve housekeeping and storage in these areas, as not all the labels could be easily read, and the drums from Clean Harbors were stacked two-high and did not appear stable. It was observed during the site visit of 05-27-09 that the drums of used hydraulic oil had been processed.

Solid waste managed at the facility includes oily solid waste generated by HOWCO and its customers. Solid waste streams received are analyzed at least once every five years in accordance with the permit. The WTU sludge generated at the facility is to be analyzed annually, but at the time of inspection, the required analyses had not yet been performed which is a violation of Part II.6 of HOWCO's permit. The sludge was sampled on April 23, 2009, after the inspection, and results indicate that the filter cake is nonhazardous. Solid waste is either sent to a landfill or to the incinerator.

The Maintenance Shop generates used oil, used antifreeze and oily waste. There is also a 25-gallon parts washer in use. Wastes observed here include 55-gallon drums of used oil filters, spent sorbents, used oil, used antifreeze and oily rags. There were also some smaller containers like drain pans, and step cans. There was one 5-gallon bucket containing used oil that was not properly labeled. The contents of this container were transferred to the storage drum. Used oil and antifreeze containers are equipped with secondary containment as applicable. It was noted that the area around the used oil drum appeared messy, and the Department recommends

Inspection Date: 04/23/2009

reviewing proper housekeeping procedures with Maintenance staff. Batteries are returned to the vendor for core credit.

Behind the laboratory, there are two 55-gallon drums of used oil in secondary containment. The drums are covered, labeled and provided with containment. The drums collect sample waste from the laboratory. Processed oil is randomly sampled biweekly and tested to confirm it is on-spec. Metal analyses are done off site by PhosLab. Samples of processed oil are retained in the laboratory for thirty days. Hazardous COD testing waste is generated in the laboratory, and spent vials are accumulated in a box labeled "spent vials." Staff said fluorescent lamps are taken on CESQG days to the County collection center for disposal, which is also how laboratory wastes are disposed of. Hazardous wastes have not been disposed of since the last inspection.

Records were reviewed and found to be complete and up to date with the following exception. The facility's contingency plan did not have the currently designated emergency coordinators. On 05-13-09, HOWCO submitted a revised list of emergency coordinators to the previous plan recipients. Most HOWCO employees, including all the designated emergency coordinators, attended a Used Oil Management Workshop on 05-22-09, and all HOWCO drivers also attended the associated Driver Training Class. Based on the review of manifests, HOWCO is doing a better job of recording its customers' EPA ID numbers as required by Rule. Please note that there was a typographical error on the paperwork for Lakeland Chrysler where the EPA ID number is incorrectly recorded as "FLD 982 100 343 4." The correct EPA ID number for this generator is "FLD 982 103 434."

**New Potential Violations and Areas of Concern:****Checklist Independent Potential Violations and Areas of Concern**

Type:	Area Of Concern
Rule:	262.11
Explanation:	HOWCO did not timely analyze the WTU sludge to confirm it is still nonhazardous. This is required annually by Part II.6 of the permit.
Corrective Action:	The sludge was sampled immediately following the inspection. Analyses indicate the WTU sludge is nonhazardous.

---

Type:	Violation
Rule:	279.52(a)(5)
Explanation:	There was inadequate aisle space in the used oil filter drum storage area. (corrected)
Corrective Action:	HOWCO personnel rearranged the drums during the inspection.

---

Type:	Violation
Rule:	279.52(b)(2)(iv)
Explanation:	The plan did not list the currently designated emergency coordinators. (corrected)
Corrective Action:	On 05-13-09, HOWCO sent a revised list of emergency coordinators to previous plan recipients.

---

Type:	Violation
-------	-----------



Inspection Date: 04/23/2009

Rule: 279.22(c)(1)

Explanation: There was a 5-gallon bucket of used oil in the Maintenance Shop that was not labeled.  
(corrected)

Corrective Action: The contents of the bucket were transferred to an appropriate container.

---

**Summary of Potential Violations and Areas of Concern:**Potential Violations

Rule Number	Area	Date Cited	Explanation
Checklist Independent Violations			
279.52(a)(5)		04/23/2009	There was inadequate aisle space in the used oil filter drum storage area. (corrected)
279.52(b)(2)(iv)		04/23/2009	The plan did not list the currently designated emergency coordinators. (corrected)
279.22(c)(1)		04/23/2009	There was a 5-gallon bucket of used oil in the Maintenance Shop that was not labeled. (corrected)

Areas of Concern

Rule Number	Area	Date Cited	Explanation
Checklist Independent Areas of Concern			
262.11		04/23/2009	HOWCO did not timely analyze the WTU sludge to confirm it is still nonhazardous. This is required annually by Part II.6 of the permit.

**Conclusion:**

Based on the observations made during this inspection, HOWCO was in violation of regulations applicable to used oil processors. The facility has returned to compliance.

Inspection Date: 04/23/2009

**Signed:**

A hazardous waste compliance inspection was conducted on this date, to determine your facility's compliance with applicable portions of Chapters 403 & 376, F.S., and Chapters 62-710, 62-730, 62-737, & 62-740 Florida Administrative Code (F.A.C.). Portions of the United States Environmental Protection Agency's Title 40 Code of Federal Regulations (C.F.R.) 260 - 279 have been adopted by reference in the state rules under Chapters 62-730 and 62-710, F.A.C. The above noted potential items of non-compliance were identified by the inspector(s).

This is not a formal enforcement action and may not be a complete listing of all items of non-compliance discovered during the inspection.

Kelly M. Honey

**PRINCIPAL INSPECTOR NAME**

Environmental Specialist III

**PRINCIPAL INSPECTOR TITLE****PRINCIPAL INSPECTOR SIGNATURE**

FDEP

**ORGANIZATION**

6/8/2009

**DATE**

Brian Gross

**INSPECTOR NAME**

Environmental Scientist

**INSPECTOR TITLE**

NO SIGNATURE

**INSPECTOR SIGNATURE**

US EPA Region IV

**ORGANIZATION**

Richard Dillen

**REPRESENTATIVE NAME**

Quality Assurance Officer

**REPRESENTATIVE TITLE**

NO SIGNATURE

**REPRESENTATIVE SIGNATURE**

HOWCO Environmental Services

**ORGANIZATION**

Lee Morris

**REPRESENTATIVE NAME**

Director of Operations

**REPRESENTATIVE TITLE**

NO SIGNATURE

**REPRESENTATIVE SIGNATURE**

HOWCO Environmental Services

**ORGANIZATION**

NOTE: By signing this document, the Site Representative only acknowledges receipt of this Inspection Report and is not admitting to the accuracy of any of the items identified by the Department as "Potential Violations" or areas of concern.



May 11, 2009

Department of Environmental Protection  
Southwest District  
13051 North Telecom Parkway  
Tampa, FL 33637-0926

Dept. Of Environmental Protection

MAY 13 2009

Southwest District

Mr. James Dregne

This letter is intended to notify the Department of HOWCO's change to its EMERGENCY COORDINATOR INFORMATION Plan as part of the Used Oil Permit Application submitted to the Department July 11<sup>th</sup> 2005 and updated January 9<sup>th</sup> 2006, May 14<sup>th</sup> 2007 and May 11<sup>th</sup> 2009.

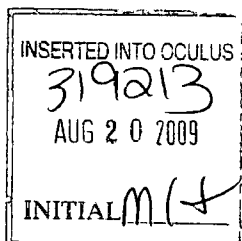
Please replace the attached amended page 17, Revision 4.

If there are any questions please do not hesitate to contact us at (727) 327-8467.

Sincerely,

Richard Dillen  
Q.A.O.  
HOWCO Environmental Services

Cc; Mr. Bheem Kothur



#### **4.0 EMERGENCY COORDINATOR (PIC) INFORMATION**

##### **Duties of the Emergency Coordinator or Designee**

- Respond to any emergencies that may arise. Use established response protocols and personal protective equipment as needed. Summon aid as necessary. Evacuate as required.
- In case of FIRE, summon the Fire Department and the Police immediately by activating the alarm system and by dialing 911. If there are injuries Emergency Management Services (EMS) can also be contacted by dialing 911.
- In the event of a spill, release or discharge, contain the flow of hazardous materials to the extent possible. Spills to the city sewer must be reported to the Utility Department. Spills must also be reported to the State Warning Point (850) 320-0519 or (800) 413-9911, and/or the National Response Center (800) 424-8802 if above the reportable quantity. Check SARA Title III.
- Clean up the waste and any contaminated materials or soil as soon as it is practical.
- If the incident i.e. fire, explosion, or other release, could threaten human health outside the facility or HOWCO has knowledge that a spill has reached surface water, notify the National Response Center Immediately at (800) 424-8802.

The following identifies the primary and alternate emergency coordinators:

##### **Recycling Facility Primary Emergency Coordinator (Primary PIC)**

Dave Roehm

Cell Phone # 727-385-1508

Dept. Of Environmental Protection

**MAY 13 2009**

If the Primary PIC is unavailable, contact the Secondary PIC.

Southwest District

##### **Recycling Facility Secondary Emergency Coordinator (Secondary PIC)**

Lee Morris

Cell Phone # 727-543-5429

Or

Tim Hagan

Cell Phone # 727-804-4446

At all times, there will be at least one PIC either at the facility or on call who is available to respond to an emergency by reaching the facility within a short period of time and has the responsibility for coordinating all emergency response measures. The PIC will be familiar with all aspects of this plan, all operations and activities of the facility, the location and characteristics of the materials handled, the location of all records within the facility, and the general facility layout. Additionally, all PICs have the authority to commit resources needed to carry out this plan.

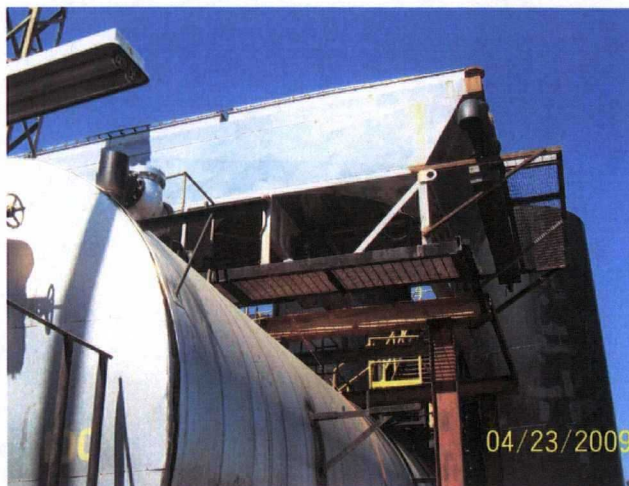
#### **5.0 ARRANGEMENTS WITH LOCAL AUTHORITIES**

Arrangements with authorities are established by providing appropriate agencies with a copy of the plan and a letter requesting their assistance in the event of an emergency. In the event





04/23/2009



04/23/2009



04/23/2009



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-319217 October 8-2009

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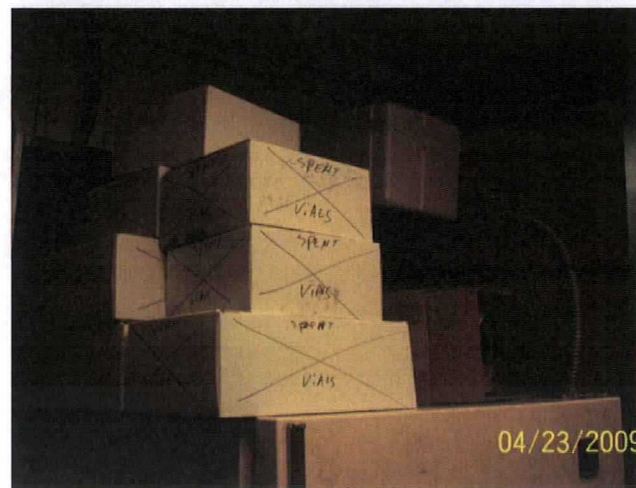
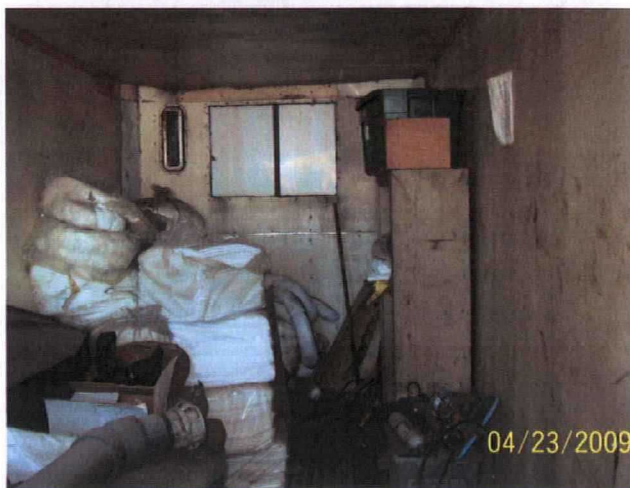
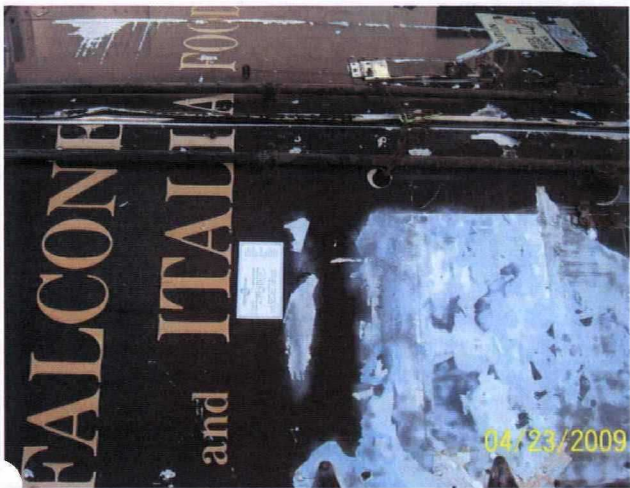












## DOCUMENTS AND RECORDKEEPING

<input checked="" type="checkbox"/> Permit Application.	<input type="checkbox"/> Operating Permit. <b>MO</b> ✓
<input type="checkbox"/> Validated Annual Used Oil Registration [Form 62-701.900(13)]. <b>MO</b>	<input checked="" type="checkbox"/> Annual Used Oil Recovery Report. <b>2/16/09</b> <b>7308878-G collected</b> <b>6505285-G managed</b> <b>2775000-VOS managed</b>
<input checked="" type="checkbox"/> Annual DEP Registration Placard For Storage Tanks. <b>MO exp. 06/30/09</b>	<input type="checkbox"/> Contingency Plan. <b>5-14-07</b> <b>version - need to revise to reflect new EC.</b>
<input type="checkbox"/> Training Logs. <b>MO.</b> <b>will end prev 08-22-09</b>	<input checked="" type="checkbox"/> Closure Plan. <b>in permit app.</b>
<input checked="" type="checkbox"/> Results of Annual Waste Analyses For All Solid Waste Streams <b>Disposed.</b> <b>6-03-08</b>	<input checked="" type="checkbox"/> Annual Closure Cost Update <b>99828.55 02-10-09</b>
<input type="checkbox"/> Results of Annual Waste Analyses For All Solid Waste Streams <b>Received From</b> Generators. <b>Lab &amp; MO</b>	<input checked="" type="checkbox"/> Transporter Liability Insurance [\$100,000 minimum]. <b>1,000,000</b> <b>exp 07-02-09</b>
<input checked="" type="checkbox"/> Processed Oil Sampling Logs [Minimum Of One Sample Every Two Weeks].	<input checked="" type="checkbox"/> Monthly Inspection Logs Of The Solids Storage and Sludge Separation Areas. <b>B.G.</b>
<input checked="" type="checkbox"/> Tank Inspections and Monthly Release Detection Monitoring. <b>- B.G.</b> <b>+ weeklies of drum storage area</b>	<input type="checkbox"/> Annual Analyses Of WWT and OES Sludges. <b>04-23-09 sampled TELP FULL</b>
<input type="checkbox"/> Analysis Of Vibrascreen Filter Solids and Tank Bottom Sludges [Unless Processed in Tanks 110 or 111].	<input type="checkbox"/> Generator Non-Haz Demonstration For Used Antifreeze - N/A now recycled <b>ECO-freeze - Norcross, GA</b>
<input type="checkbox"/> Documentation Of Annual Closure Cost Estimate [Solid Waste Processing] - N/A Now part of UOP closing costs estimate	<input type="checkbox"/> Records Of Refused Used Oil Shipments <b>None refused - either returned or not picked up</b>
<input type="checkbox"/> Records Of Quantities Of Waste Received, Stored, Processed and Disposed.	<input type="checkbox"/> Documentation Of Annual Financial Assurance [Solid Waste Processing] - N/A
<input type="checkbox"/> Records Of Disposal Or Treatment Facility For All Solid Wastes Removed [Name and Location].	<input type="checkbox"/> Quarterly Submittals Of Material Balance Of Quantities Of Solid Waste. - N/A
<input type="checkbox"/> Copies Of Permits For Facilities Receiving Processed Wastes.	<input checked="" type="checkbox"/> Monthly Solid Waste Inspection / Corrective Actions Logs. <b>B.G.</b>
<input checked="" type="checkbox"/> Monthly Inspection Logs Of Safety and Emergency Equipment. <b>B.G.</b>	<input type="checkbox"/> Manifests / Bill-Of-Lading. <b>MO.</b> ✓ <b>CHECK to see if CESQG status</b> ✓

INSERTED INTO OCULUS  
319222  
AUG 20 2009

INITIAL

**\* also just started w/ new company: on-site recycling**  
**RF - log - see notes**  
**04/20/11 at Clark Dr. Rt. 111 21022**



**HOWCO Environmental Services**  
**Compliance Evaluation Inspection Checklist**

I.11 Personnel training is documented. ☐ Y ☐ N

I.14 A copy of the Contingency Plan is maintained onsite. (40 CFR 279.52(b)(3)(i)) ☐ Y ☐ N

I.14 Amendments to the CP are sent to appropriate agencies. ☐ Y ☐ N

I.14(a) All areas are cleaned to prevent nuisance conditions, hazardous conditions, and minimize releases. (prevention of odor or vector problems not located in new permit) ☐ Y ☐ N

I.14(b)3 Emergency and spill equipment is available at the facility. ☐ Y ☐ N  
Check the emergency equipment stored east of the truck wash rack and at the drum crusher.

I.14(c) Emergency and safety equipment is available, tested and maintained. ☐ Y ☐ N

I.14(e) There is adequate aisle space in all storage areas for inspections. ☐ Y ☐ N

Primary evacuation routes are posted in appropriate locations throughout the facility. (not located in new permit) ☐ Y ☐ N

The following are still the Emergency Coordinators: ☐ Y ☐ N

~~Lee Morris~~

Primary

~~Tim Hagan~~

Alternate

Tim Morris

Contracted Alternate

Dave Reahm - 10  
Lee Morris - 20

A list of emergency response phone numbers is posted by the phones. ☐ Y ☐ N  
(not located in new permit)

The Contingency Plan was last amended on (date) 05-14-07

\*needs  
revision  
again to  
reflect new E.C.

**Part II. Used Oil Processing Requirements**

II.1 Processed oil is sampled prior to shipping off-site *once every two weeks*. ☐ Y ☐ N

II.1(b) All outgoing materials for disposal are sampled and analyzed annually. ☐ Y ☐ N

II.1(c) 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

II.2 The facility is in compliance with Financial Assurance requirements.  
• Closure costs are submitted annually prior to August 3; ☐ Y ☐ N  
• Annual submittal of proof of financial assurance. ☐ Y ☐ N

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

Page 1 Permit application ☐ Y ☐ N

II.2 Shipping papers include all of the required information as stated in 40 CFR 279.56 (Acceptance / Delivery) ☐ Y ☐ N

II.3 Operating record ☐ Y ☐ N

#### **4.0 EMERGENCY COORDINATOR (PIC) INFORMATION**

##### **Duties of the Emergency Coordinator or Designee**

- Respond to any emergencies that may arise. Use established response protocols and personal protective equipment as needed. Summon aid as necessary. Evacuate as required.
- In case of FIRE, summon the Fire Department and the Police immediately by activating the alarm system and by dialing 911. If there are injuries Emergency Management Services (EMS) can also be contacted by dialing 911.
- In the event of a spill, release or discharge, contain the flow of hazardous materials to the extent possible. Spills to the city sewer must be reported to the Utility Department. Spills must also be reported to the State Warning Point (850) 320-0519 or (800) 413-9911, and/or the National Response Center (800) 424-8802 if above the reportable quantity. Check SARA Title III.
- Clean up the waste and any contaminated materials or soil as soon as it is practical.
- If the incident i.e. fire, explosion, or other release, could threaten human health outside the facility or HOWCO has knowledge that a spill has reached surface water, notify the National Response Center Immediately at (800) 424-8802.

The following identifies the primary and alternate emergency coordinators:

##### **Recycling Facility Primary Emergency Coordinator (Primary PIC)**

Lee Morris

Cell Phone # 727-543-5429

If the Primary PIC is unavailable, contact the Secondary PIC.

##### **Recycling Facility Secondary Emergency Coordinator (Secondary PIC)**

Tim Morris

Cell Phone # 727-385-1510

Or

Tim Hagan

Cell Phone # 727-804-4446

At all times, there will be at least one PIC either at the facility or on call who is available to respond to an emergency by reaching the facility within a short period of time and has the responsibility for coordinating all emergency response measures. The PIC will be familiar with all aspects of this plan, all operations and activities of the facility, the location and characteristics of the materials handled, the location of all records within the facility, and the general facility layout. Additionally, all PICs have the authority to commit resources needed to carry out this plan.

#### **5.0 ARRANGEMENTS WITH LOCAL AUTHORITIES**

Arrangements with authorities are established by providing appropriate agencies with a copy of the plan and a letter requesting their assistance in the event of an emergency. In the event

## Honey, Kelly

---

**From:** Honey, Kelly  
**Sent:** Thursday, April 30, 2009 1:45 PM  
**To:** Dregne, James  
**Subject:** RE: IMG00028-20090430-1152.jpg

Jim,

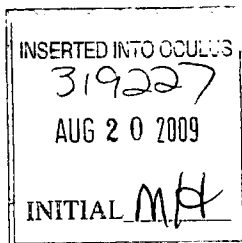
I just spoke with Richard Dillen at HOWCO. He said that the tanker was full- carrying about 5,000-gallons, but to his knowledge, they only spilled around 100-gallons and that the tanker was intact. He said Lee Morris, the Director of Operations, was on site and had been there since this morning when they found out about it. The driver appears to be shaken but okay and is in the hospital under observation to make sure. I asked him we needed to come out or if this was something that could be handled by BER and their emergency responder and he said at this point, they had it pretty much under control. I said to please call if conditions changed or if something arose that we should be concerned about. He said okay, and that he appreciated our calling to ask about them.

-kelly

-----Original Message-----

**From:** Dregne, James  
**Sent:** Thursday, April 30, 2009 12:47 PM  
**To:** Honey, Kelly  
**Subject:** FW: IMG00028-20090430-1152.jpg

FYA





## Honey, Kelly

---

**From:** Dregne, James  
**Sent:** Thursday, April 30, 2009 12:47 PM  
**To:** Honey, Kelly  
**Subject:** FW: IMG00028-20090430-1152.jpg  
**Attachments:** IMG00028-20090430-1152.jpg

FYA



## Kothur, Bheem

---

**From:** Kothur, Bheem  
**Sent:** Tuesday, February 10, 2009 3:24 PM  
**To:** 'RDILLEN@HOWCOUSA.COM'  
**Cc:** Hornbrook, Frank; Dregne, James; Wick, Fred; Graves, Aprilia; White, John; Waters, Jeff T.  
**Subject:** Howco Environmental Services, Closure Cost Estimates, Dated January 30, 2009

Hello Richard:

I have received your revised closure cost estimates for both the facilities, reviewed and approved. The submitted closure cost estimates are and accepted for the Year 2009.

1. Howco Environmental Services  
843 43<sup>rd</sup> Street South  
St. Petersburg, FL 33711

The approved amount \$99,829.00

2. Howco Environmental Services  
24133 State Road 40  
Astor, FL 32102

The approved amount \$23,753.00


Please contact Frank Hornbrook, FA coordinator on Solid Waste Section to comply with FA for the year 2009.

Rick,

If you need any further information, please call me or Frank Hornbrook or you may e-mail us.

Thanks.

Bheem R. Kothur, P.E., DEE  
Professional Engineer III  
DWM/BS&HW/HW Regulation Section  
Florida Department of Environmental Protection  
MS# 4560, 2600 Blair Stone Road  
Tallahassee, Florida 32399-2400  
Tel: 850-245-8781, FAX: 850-245-8810  
Email: [Bheem.Kothur@dep.state.fl.us](mailto:Bheem.Kothur@dep.state.fl.us)

	Initials _____
	Date _____



January 30, 2009

Solid Waste Financial Coordinator  
MS 4565  
FDEP  
2600 Blair Stone Road  
Tallahassee, FL 32399-2400

RE: Closing cost estimate updates

To whom it may concern:

Enclosed please find copies of the updated Used Oil Processing Facility Closing Cost Estimate Forms for the following locations:

- 1) HOWCO Environmental Services  
843 43<sup>rd</sup> Street South, St. Petersburg, FL 33711
- 2) HOWCO Environmental Services  
24133 State Road 40, Astor, FL 32102

In addition, I have also included the amendment to Irrevocable Letter of Credit No. 296-01 to the appropriate amount for the St. Petersburg facility.

If you have any questions or need additional information, please call me at tel. 727-328-7403.

Sincerely,

Richard Dillen  
Quality Assurance Officer

Cc: File

RECEIVED

FEB 06 2009

BY: BSHW

RECEIVED  
RCRA

FEB 05 2009

Hazardous Waste Regulation



RECEIVED

## Florida Department of Environmental Protection

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

DEP Form #62-710.901(7)  
Form Title Used Oil Facility Financial  
Assurance Closing Cost Estimate Form  
Effective Date June 9, 2005

## Used Oil Processing Facility Closing Cost Estimate Form

Date: January 30, 2009Date of DEP Approval: February 5, 2008I. GENERAL INFORMATION: Latitude: 29°09'46"N Longitude: 81°32'26"W EPA ID Number: FLD 101 828 689Facility Name: Hagan Holding Company d/b/a HOWCO Environmental Services Permit Number: 27221-HO-003Facility Address: 24133 State Road 40Mailing Address: 3701 Central Avenue, St. Petersburg, FL 33713Contact Person's Name: Richard DillenPhone Number: (727) - 328 - 7403Fax Number: (727) 328-7782Email: RDILLEN@HOWCOUSA.COM

## II. TYPE OF FINANCIAL ASSURANCE DOCUMENT (Check Type)

☒ Letter of Credit\*☐ Performance Bond\*☐ Guaranty Bond\*\*Indicate mechanisms that  
require use of a Standby☐ Insurance Certificate☐ Financial Test☐ Trust Fund Agreement

Trust Fund Agreement

## III. ESTIMATE ADJUSTMENT: (check and use either box a or b, below)

40 CFR Part 264, Subpart H, as adopted by reference in Rule 62-701.630, Florida Administrative Code, sets forth the method of annual cost estimate adjustment. Cost estimates may be adjusted by using an inflation factor or by recalculating the maximum costs of closing in current dollars. Estimates are due annually between January 1 and March 1. Select one of the methods of cost estimate adjustment below.



(a) Inflation Factor Adjustment

Inflation adjustment using an inflation factor may only be made when a Department approved closing cost estimate exists and no changes have occurred in the facility operation which would necessitate modification to the closure plan. The inflation factor is derived from the most recent Implicit Price Deflator for Gross National Product published by the U.S. Department of Commerce in its survey of Current Business. The inflation factor is the result of dividing the latest published annual Deflator by the Deflator for the previous year. The inflation factor may also be obtained from the Solid Waste Financial Coordinator at (850) 245-8732 or be found online at <http://www.dep.state.fl.us/waste/categories/swfr/>

This adjustment is based on the Department approved closing cost estimate dated:

\$ 23,173.97	X	1.025	=	\$ 23,753.32
Latest DEP approved		Current Year		Inflation Adjusted
Closing Cost Estimate		Inflation Factor		Annual Closing Cost Estimate

Signature:

Phone: (727) - 328 - 7403Name and Title: Richard Dillen, Quality Assurance OfficerE-Mail: RDILLEN@HOWCOUSA.COM

If you have questions concerning this form, please contact the Used Oil Coordinator at the address below, by phone at (850) 245-8755, or by E-Mail at: [richard.neves@dep.state.fl.us](mailto:richard.neves@dep.state.fl.us)

**Please mail this completed cost estimate to:****Please mail a copy of the cost estimate to:**

Used Oil Permit Coordinator  
MS4560  
FDEP  
2600 Blair Stone Road  
Tallahassee, FL 32399-2400

Solid Waste Financial Coordinator  
MS 4565  
FDEP  
2600 Blair Stone Road  
Tallahassee, FL 32399-2400





# Florida Department of Environmental Protection

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

DEP Form #62-710.901(7)  
Form Title Used Oil Facility Financial  
Assurance Closing Cost Estimate Form  
Effective Date June 9, 2005

## Used Oil Processing Facility Closing Cost Estimate Form

Date: January 30, 2009

Date of DEP Approval: April 24, 2008

I. GENERAL INFORMATION: Latitude: 27°45'47"N Longitude: 82°41'32"W EPA ID Number: FLD 152 764 767

Facility Name: Hagan Holding Company d/b/a HOWCO Environmental Services Permit Number: 33721-HO-001

Facility Address: 843 43<sup>rd</sup> Street South, St. Petersburg, FL 33711

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

Contact Person's Name: Richard Dillen

Phone Number: (727) - 328 - 7403

Fax Number: (727) 328-7782

Email: RDILLEN@HOWCOUSA.COM

### II. TYPE OF FINANCIAL ASSURANCE DOCUMENT (Check Type)

☒ Letter of Credit\*      ☐ Performance Bond\*      ☐ Guaranty Bond\*      \*Indicate mechanisms that  
require use of a Standby  
☐ Insurance Certificate      ☐ Financial Test      ☐ Trust Fund Agreement      Trust Fund Agreement

### III. ESTIMATE ADJUSTMENT: (check and use either box a or b, below)

40 CFR Part 264, Subpart H, as adopted by reference in Rule 62-701.630, Florida Administrative Code, sets forth the method of annual cost estimate adjustment. Cost estimates may be adjusted by using an inflation factor or by recalculating the maximum costs of closing in current dollars. Estimates are due annually between January 1 and March 1. Select one of the methods of cost estimate adjustment below.

☒ (a) Inflation Factor Adjustment

Inflation adjustment using an inflation factor may only be made when a Department approved closing cost estimate exists and no changes have occurred in the facility operation which would necessitate modification to the closure plan. The inflation factor is derived from the most recent Implicit Price Deflator for Gross National Product published by the U.S. Department of Commerce in its survey of Current Business. The inflation factor is the result of dividing the latest published annual Deflator by the Deflator for the previous year. The inflation factor may also be obtained from the Solid Waste Financial Coordinator at (850) 245-8732 or be found online at <http://www.dep.state.fl.us/waste/categories/swfr/>

This adjustment is based on the Department approved closing cost estimate dated:

\$ 97,393.71      X      1.025      =      \$ 99,828.55  
Latest DEP approved      Current Year      Inflation Adjusted  
Closing Cost Estimate      Inflation Factor      Annual Closing Cost Estimate

Signature: \_\_\_\_\_

Phone: (727) - 328 - 7403

Name and Title: Richard Dillen, Quality Assurance Officer

E-Mail: RDILLEN@HOWCOUSA.COM

If you have questions concerning this form, please contact the Used Oil Coordinator at the address below, by phone at (850) 245-8755, or by E-Mail at: [richard.neves@dep.state.fl.us](mailto:richard.neves@dep.state.fl.us)

**Please mail this completed cost estimate to:**

**Please mail a copy of the cost estimate to:**

Used Oil Permit Coordinator  
MS4560  
FDEP  
2600 Blair Stone Road  
Tallahassee, FL 32399-2400

Solid Waste Financial Coordinator  
MS 4565  
FDEP  
2600 Blair Stone Road  
Tallahassee, FL 32399-2400



**SYNOVUS BANK**

**STATE OF FLORIDA  
SOLID WASTE MANAGEMENT FACILITY IRREVOCABLE LETTER OF CREDIT  
(AMENDMENT)  
TO DEMONSTRATE FINANCIAL ASSURANCE  
FOR CLOSING**

January 16, 2009

Director, Division of Waste Management  
Florida Department of Environmental Protection  
Twin Towers Office Building  
2600 Blair Stone Road MS 4565  
Tallahassee, Florida 32399-2400

Synovus Bank Formerly Known as  
Synovus Bank of Tampa Bay  
Successor in Interest to United Bank  
and Trust Company  
P.O. Box 30707  
Tampa, Florida 33630-3707

RE: Letter of Credit Number 296-01

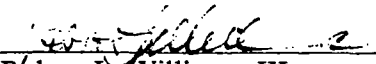
Expiration Date: December 5, 2009

Dear Sir or Madam:

We hereby amend our Irrevocable Letter of Credit No. 296-01 in your favor, at the request and for the account of Hagan Holding Company DBA Howco Environmental Services, 3701 Central Avenue, St. Petersburg, Florida 33713 as follows:

The dollar amount of the Letter of Credit is increased from Ninety Seven Thousand Three Hundred Ninety Three Dollars and 71/100ths (\$97,393.71) to Ninety Nine Thousand Eight Hundred Twenty Eight Dollars and 55/100 (\$99,828.55). All other terms and conditions remain the same.

This credit is subject to the most recent edition of the Uniform Customs and Practice for Document Credits, as published and copy righted by the International Chamber of Commerce.

  
Robert L. Williams, III  
Senor Vice President



# Department of Environmental Protection

FDEP MS 4555 2600 Blair Stone Road Tallahassee, Florida 32399-2400

DEP Form #62-710.601(4)  
Form Title Certificate of Liability Insurance  
Used Oil Transporters  
Effective Date June 9, 2005

MAR 23 2009

## Certificate of Liability Insurance Used Oil Transporters

Please Print or Type Form

BY: RENEE

1. Commerce & Industry Ins. Co. (the Insurer), 70 Pine St., New York, NY 10270  
(Name of the Insurer) (Address of the Insurer)

hereby certifies that it has issued liability insurance to: Hagan Holding Company dba:  
Howco Environmental Services (the Insured),  
(Name of the Insured)

3701 Central Avenue St. Petersburg FL 33713  
(Address of the Insured) whose EPA Identification number is 152764767

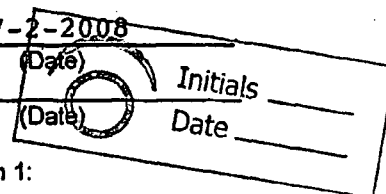
This insurance complies with the insured's obligation to demonstrate the financial responsibility required by Florida

Administrative Code Rule 62-710.600(2)(d). [See page 2 on the back side of this Form]

The insurance is primary and the company shall be liable for amounts up to \$ 1,000,000 less the deductible or retention of \$ 0 for each accident exclusive of legal defense costs. If a deductible or retention is applied, its amount may not exceed 10% of the equity of the Insured.

This coverage is provided under policy number CA5677907 issued on 7-2-2008

The expiration date of said policy is 7-2-2009 or the annual renewal date is \_\_\_\_\_  
(Date) (Date)



2. The Insurer further certifies the following with respect to the insurance described in Paragraph 1:

- Bankruptcy or insolvency of the insured shall not relieve the Insurer of its obligations under this policy.
- The Insurer is liable for the payment of amounts within any deductible applicable to the policy, with a right of reimbursement by the Insured for any such payment made by the Insurer.
- Whenever requested by the Secretary (or designee) of the Florida Department of Environmental Protection (FDEP), the Insurer agrees to furnish to the Department a signed duplicate original of the policy and all endorsements.
- Cancellation of the insurance, whether by the Insurer or the Insured or by any other termination of the insurance (e.g. expiration or non-renewal), will be effective only upon written notice and only after the expiration of thirty (30) days after a copy of such written notice is received by the Secretary of the FDEP as evidenced by certified mail return receipt.
- The Insurer shall not be liable for the payment of any judgment or judgments against the insured for claims resulting from accidents which occur after the termination of the insurance described herein, but such termination shall not affect the liability of the Insurer for the payment of any such judgments resulting from accidents which occur during the time the policy is in effect.

I hereby certify that the Insurer is licensed to transact the business of insurance, or eligible to provide insurance as an excess or surplus line insurer, in one or more States, including Florida.

Patricia Lane Schmaltz  
(Signature of Insurer or Authorized Representative)

Authorized Representative of

Patricia Lane Schmaltz

Commerce & Industry Ins. Co.

(Type Name)

Manager, Environmental Practice Group

(Name of Insurer)

Lassiter Ware Insurance

4401 W. Kennedy Blvd., Ste. 200

(Title)

(Address of Representative)

Page 1 of 2

Tampa, FL 33609



# Florida Department of Environmental Protection

Bob Martinez Center  
2600 Blair Stone Road MS 4565  
Tallahassee, Florida 32399-2400

Charlie Crist  
Governor

Jeff Kottkamp  
Lt. Governor

Michael W. Sole  
Secretary

## MEMORANDUM

TO: Used Oil Processing Facility Owners and Operators

FROM: Fred J. Wick, Environmental Manager  
Solid Waste Section *F*

DATE: January 12, 2009

SUBJECT: Annual Cost Estimate Adjustment

This memo is a reminder to owners and operators of used oil processing facilities that it may be time to inflation adjust facility closing cost estimates. If you have already submitted your cost estimate update for 2009, please disregard this notice.

Cost estimate adjustments must be made every year between January 1 and March 1. To fully comply with the filing requirements of Rule 62-710.800(6), Florida Administrative Code, you must complete Form 62-710.901(7). This form is available on line at

[http://www.dep.state.fl.us/waste/categories/used\\_oil/pages/forms.htm](http://www.dep.state.fl.us/waste/categories/used_oil/pages/forms.htm)

or directly from DEP offices. Remember, if you are adjusting your estimate using the current inflation factor (1.025), you still must submit the first page of Form 62-710.901(7).

Please submit updated cost estimates to the Used Oil Permit Coordinator for review and approval, with a copy to the Solid Waste Financial Coordinator. Both addresses are on the form. Contact the Used Oil Permit Coordinator for further assistance with cost estimates. If you have any questions concerning financial assurance, please contact Frank Hornbrook at (850) 245-8745.

cc: Richard Tedder, DEP/SW  
Bheem Kothur, DEP/HW  
Rick Neves, DEP/HW

Memorandum

Environmental Protection

SOUTHWEST DISTRICT ENFORCEMENT COVER MEMO

TO: JD James Dregne, Hazardous Waste Program Manager 10/20

THROUGH: W Elizabeth Knauss, HW Enforcement Coordinator

FROM: VA Kelly Honey, Environmental Specialist III

DATE: October 6, 2008

FILE NAME: HOWCO Environmental Services COUNTY: Pinellas

PROGRAM: Hazardous Waste PROJECT # N/A

TYPE OF DOCUMENT: Inspection Report and Cover Letter

REQUESTED ACTION: APPROVAL

DESCRIPTION OF VIOLATIONS:

With the exception of failing to note the EPA ID number of every generator from which it receives used oil, there were no violations noted. There was an issue with documentation of analyses performed with the XRF unit, but these have been discussed and will be addressed by HOWCO.

STATUS OF CORRECTIVE ACTIONS:

HOWCO will begin keeping a log of analyses performed using the XRF unit.

STATUS OF PENALTY ASSESSMENT:

N/A

PENALTY: ☒ Not Applicable

Amount:

Costs & Expenses:

Total: N/A

Secretary Approval ☒ Not required / Approved on \_\_\_\_\_

Attachments: Inspection Report and Cover Letter





# Florida Department of Environmental Protection

Southwest District Office  
13051 North Telecom Parkway  
Temple Terrace, Florida 33637-0926

Charlie Crist  
Governor

Jeff Kottkamp  
Lt. Governor

Michael W. Sole  
Secretary

October 29, 2008

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

Re: HOWCO Environmental Services  
EPA ID #FLD 152 764 767  
Pinellas County

Dear Mr. Hagan:

Thank you for your assistance during the RCRA compliance inspection conducted on August 15, 2008.

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 the hazardous waste regulations governing conditionally exempt small quantity generators and used oil processors.

Your continued cooperation is appreciated. If you have any questions please call me at (813) 632-7600, extension 369.

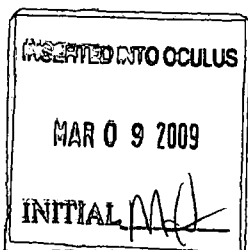
Sincerely,

Kelly M. Honey  
Environmental Specialist III  
Division of Waste Management  
Southwest District

JD/kmh

enclosure

cc: Charles Ryburn, Pinellas County Environmental Management Department





Florida Department of  
Environmental Protection  
Hazardous Waste Inspection Report

**FACILITY INFORMATION:**

**Facility Name:** Howco Environmental Services

**On-Site Inspection Start Date:** 08/15/2008

**On-Site Inspection End Date:** 08/15/2008

**ME ID#:** 1038

**EPA ID#:** FLD152764767

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

**Contact Mailing Address:** 843 43rd St S, St Petersburg, Florida 33711-1922

**County Name:** Pinellas

**Contact Phone:** (727) 327-8467

**NOTIFIED AS:**

SQG (100-1000 kg/month)

Transporter

**CURRENT STATUS:**

CESQG (<100 kg/month)

Used Oil Transporter

Used Oil Generator

Used Oil Processor

Used Oil Marketer

**INSPECTION TYPE:**

Permitting Inspection for Used Oil facility

**INSPECTION PARTICIPANTS:**

**Principal Inspector:** Kelly M. Honey, Environmental Specialist III

**Other Participants:** Elizabeth Knauss, Compliance and Enforcement Manager; Lee Morris, Director - Operations/Transportation; Richard Dillen, Laboratory Manager

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

**SIC CODE:** 2999 - Manufacturing - petroleum and coal products, nec

**TYPE OF OWNERSHIP:** Private

**Introduction:**

HOWCO Environmental Services (HOWCO) was inspected to evaluate the facility's compliance with state and federal hazardous waste regulations. The inspectors were accompanied throughout the inspection by Richard Dillen, who manages the Laboratory, and Lee Morris, who manages the Yard. The facility was last inspected by the Department of Environmental Protection (Department) on September 19, 2007.

**Process Description:**

HOWCO stores, processes and markets used oil and is a registered used oil filter transporter and processor, as well. Additionally, HOWCO accepts oily waste solids which are processed and solidified prior to disposal at a landfill. HazMat supplies are stored in one of three large trailers on the south side of the property. The contents of the HazMat trailer included drums of fire suppression foam, as well as spill control equipment. Also in this trailer were numerous cans of paints and coatings.

It was noted that at least two of the containers were leaking, and at least 10 were in poor condition. Leaked product was observed on some of the cans and on the bottom of the trailer. After the inspection, the trailer was cleaned up.

Behind the laboratory, there were two 55-gallon drums of used oil in secondary containment. The drums were covered and labeled, however, used oil was observed in the containment pan. The pan was cleaned out after the inspection.

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Inspection Date: 08/15/2008

It was noted that the facility does not keep a log of XRF analyses. The results are retained, but no log is kept. The Department is not requiring HOWCO to obtain NELAP certification for this test method, however, in accordance with 62-160.300(6), FAC, laboratory organizations shall follow the relevant Department-approved methods as provided in Rule 62-160.320, FAC, as applicable. In addition, the laboratory shall operate a quality assurance program consistent with the quality systems standards of the NELAC specified in Chapter 64E-1, FAC. As discussed subsequent to the inspection, HOWCO can meet this requirement by keeping a bound log of all samples analyzed with the XRF unit.

The log should include an equipment/instrument description list that includes the manufacturer, model number, year of purchase, accessories, and any modifications, updates, or upgrades that have been made to the unit. Samples should receive a unique identification number, and the log should include this number, along with the date and time of sampling, the person performing the testing, the source of the sample and the results, including the analysis number assigned by the unit. If any sample cleanup is done, such as centrifuging to remove water, it should also be documented. The Department also recommends the HOWCO implement analyzing duplicate samples at least once per week, if not daily.

**POTENTIAL VIOLATIONS AND AREAS OF CONCERN WITH NO ASSIGNED AREA:****Pending Potential Violations and Areas of Concern:****Used Oil Processor**

Type: Area Of Concern  
Rule: 279.52(b)(3)(i)  
Question Number: 28.28  
Explanation: Facility personnel had to look for the plan.  
Corrective Action: Plan was located during the inspection.

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Type: Area Of Concern  
Rule: 279.56(a)  
Question Number: 28.41  
Explanation: The EPA ID number for used oil generators is not always recorded.  
Corrective Action: If a facility has an EPA ID number, it must be recorded.

---

Type: Area Of Concern  
Rule: 62-710.800(4)  
Question Number: 28.6.1  
Explanation: Permit #92465-HO06-001 expired 08-03-05, but permit renewal application was not submitted until 07-19-05.  
Corrective Action: Permit #33721-HO-001 was issued 07-10-07.

---

**Used Oil Transporter**

Type: Area Of Concern

Inspection Date: 08/15/2008

Rule: 279.46(a)(2)

Question Number: 29.9.2

Explanation: The EPA ID number for used oil generators is not always recorded.

Corrective Action: If a facility has an EPA ID number, it must be recorded.

---

**Summary of Potential Violations and Areas of Concern:**Potential Violations

No Violations

Areas of Concern

Rule Number	Area	Date Cited	Explanation
Used Oil Processor 279.52(b)(3)(i)		08/15/2008	Facility personnel had to look for the plan.
279.56(a)		08/15/2008	The EPA ID number for used oil generators is not always recorded.
62-710.800(4)		08/15/2008	Permit #92465-HO06-001 expired 08-03-05, but permit renewal application was not submitted until 07-19-05.
Used Oil Transporter 279.46(a)(2)		08/15/2008	The EPA ID number for used oil generators is not always recorded.

**Conclusion:**

As requested in the previous inspection report, HOWCO should improve the solid waste tracking so that each contributor to a load of solid waste can be individually identified.

Also as requested in the previous inspection report, address the issue of the deteriorated asphalt throughout the Yard, and ensure that the facility is operated so as to minimize the possibility of releasing used oil or used oil constituents through the asphalt to the environment. Note that failure to maintain and operate the facility to minimize the possibility of any unplanned sudden or non-sudden release of used oil or used oil constituents to the environment is a violation of Specific Condition I.14.(a) in the facility's operating permit, as well as a violation of 40 CFR 279.52(a)(1). The Department recommends using a less permeable, more compatible surface than asphalt.

Inspection Date: 08/15/2008

**Signed:**

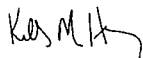
A hazardous waste compliance inspection was conducted on this date, to determine your facility's compliance with applicable portions of Chapters 403 & 376, F.S., and Chapters 62-710, 62-730, 62-737, & 62-740 Florida Administrative Code (F.A.C.). Portions of the United States Environmental Protection Agency's Title 40 Code of Federal Regulations (C.F.R.) 260 - 279 have been adopted by reference in the state rules under Chapters 62-730 and 62-710, F.A.C. The above noted potential items of non-compliance were identified by the inspector(s).

This is not a formal enforcement action and may not be a complete listing of all items of non-compliance discovered during the inspection.

Kelly M. Honey

**PRINCIPAL INSPECTOR NAME**

Environmental Specialist III

**PRINCIPAL INSPECTOR TITLE****PRINCIPAL INSPECTOR SIGNATURE**

FDEP

**ORGANIZATION**

10/6/2008

**DATE**

Elizabeth Knauss

**INSPECTOR NAME**

Compliance and Enforcement Manager

**INSPECTOR TITLE**

NO SIGNATURE

**INSPECTOR SIGNATURE**

FDEP

**ORGANIZATION**

Lee Morris

**REPRESENTATIVE NAME**

Director - Operations/Transportation

**REPRESENTATIVE TITLE**

NO SIGNATURE

**REPRESENTATIVE SIGNATURE**

HOWCO Environmental Services

**ORGANIZATION**

Richard Dillen

**REPRESENTATIVE NAME**

Laboratory Manager

**REPRESENTATIVE TITLE**

NO SIGNATURE

**REPRESENTATIVE SIGNATURE**

HOWCO Environmental Services

**ORGANIZATION**

NOTE: By signing this document, the Site Representative only acknowledges receipt of this Inspection Report and is not admitting to the accuracy of any of the items identified by the Department as "Not Ok" or areas of concern.



# FLORIDA DEPARTMENT OF ENVIRONMENTAL PROTECTION

## HAZARDOUS WASTE INSPECTION CHECK LIST

### Used Oil Generator Checklist

#### Requirements:

This section provides an opportunity for the department inspector to add a narrative explaining any requirements identified as "Not Ok" at the time of the inspection. Some requirements may be identified as "Ok" but are discussed further in the "areas of concern" portion of the narrative section.

On site storage of unmixed used oil or filter shipped through certified transporters Completed		Ok	Not Ok	Unk	N/A
5.1	Does the facility store used oil only in tanks, containers or permitted hazardous waste storage units?	✓			
5.1.1	Are containers/tanks in good condition?	✓			
5.1.2	Are containers/tanks leaking?	✓			
5.1.3	Are containers/tanks storing used oil marked with the words "Used Oil"?	✓			
5.1.4	Including fill pipes used to fill underground tanks?				✓
5.1.5	Are containers/tanks (regardless of size) that are stored outside:				
5.1.5.1	Closed or otherwise protected from the environment	✓			
5.1.5.2	Either double-walled or stored on an oil-impermeable surface with engineered secondary containment that has the capacity to hold 110% of the volume of the largest container within the secondary containment	✓			
5.1.6	Are containers/tanks that are stored inside:				
5.1.6.1	Either double-walled or stored on an oil-impermeable surface with engineered secondary containment that has the capacity to hold 110% of the volume of the largest container within the secondary containment (regardless of size)? Note: Inside containers that are 55 gallons or less are assumed to meet the secondary containment requirement if they are stored on an oil-impervious surface. Inside containers/tanks that are larger than 55 gallons and are portable/wheeled are assumed to meet the secondary containment if they are stored on an oil-impervious surface and if they are typically emptied every 24 hours.				✓
5.2	Are used oil filters stored in above ground containers which are:				
5.2.1	In good condition?	✓			
5.2.2	Are used oil filters closed or otherwise protected from weather?	✓			
5.2.3	Are used oil filters labeled "Used Oil Filters"?	✓			
5.2.4	Are used oil filters stored on an oil impervious surface?	✓			
5.3	Have any releases to the environment occurred, other than a leak from a UST?	✓			
5.3.1	If so, did the facility stop the release, contain the oil, clean up the release and manage the contaminated material properly and repair or replace the leaking units prior to returning them to service?				✓
5.4	Does the generator only use transporters who have received EPA Identification numbers?	✓			
5.4.1	Is transporter also a Florida certified used oil transporter?	✓			
5.4.2	Names and numbers of transporters: HOWCO Environmental Services (FLD 152 764 767)				
5.5	Does the facility generate other materials contaminated with used oil?	✓			
5.5.1	If so, are the materials burned for energy recovery as used oil?	✓			
5.5.2	or, Does the facility have records documenting the residuals are not hazardous waste?	✓			
5.6	Does the generator mix hazardous waste with the used oil?				✓





# **FLORIDA DEPARTMENT OF ENVIRONMENTAL PROTECTION** **HAZARDOUS WASTE INSPECTION CHECK LIST**

On site storage of unmixed used oil or filter shipped through certified transporters Completed		Ok	Not Ok	Unk	N/A
5.6					✓
5.6.1	If so, is the facility a CESQG? [CESQGs that mix HW and used oil must maintain disposal documentation per 62-730.030(3), FAC.]				✓
5.6.2	If not, Is the oil mixed with a characteristic hazardous waste? [If the facility is not a CESQG, and oil is mixed with a listed hazardous waste, it must be managed as a hazardous waste.] Describe Waste				✓
5.6.2.1	If so, does the facility document that the resultant mixture does not exhibit any characteristic of hazardous waste?				✓
5.6.2.2	Or, if the hazardous waste is only D001, that the resultant mixture is not ignitable?				✓

Generator Self Transport Completed		Ok	Not Ok	Unk	N/A
5.7	Does facility transport used oil pursuant to the generator self transport exemption?				✓
5.7.1	Transports only used oil generated on site or DIY oil to used oil collection centers or aggregation point owned by the generator? Name and location of center: Location of generator aggregation point				✓
5.7.2	If so, is this only in vehicles owned by the facility or facility employees?				✓
5.7.3	Is no more than 55 gallons transported at one time?				✓

Processor, Marketer & Burner Applicability Completed		Ok	Not Ok	Unk	N/A
5.8	Does the generator claim that the used oil meets the specification in 279.11? [If so, and the oil is to be burned for energy recovery, the generator is a marketer subject to 40 CFR 279 Subpart H.]	✓			
5.9	Does the generator process used oil by filtering, oil/water separation or other methods prior to direct shipment to an off site used oil burner? [If so, the generator is also a used oil processor subject to 40 CFR 279 - Subpart F.]	✓			
5.10	Does the generator burn on site in a space heater? [Generators who burn off site, non household oil, or burn oil in devices not meeting the space heater exemption must comply with 40 CFR 279 - Subpart G.]				✓
5.10.1	If so, does he burn only DIY oil or oil generated on site?				✓
5.10.2	Does the heater have a capacity of no more than 0.5 million BTU/hr?				✓
5.10.3	Are combustion gasses vented to the atmosphere?				✓
5.10.4	Alternatively, does the generator have a tolling arrangement with a used oil reclaimer?				✓
5.10.4.1	Is a copy of the contract kept on site specifying type and frequency of shipments?				✓
5.10.4.2	That the transport vehicle is owned by the processor?				✓
5.10.4.3	That the reclaimed oil will be returned to the generator?				✓



# FLORIDA DEPARTMENT OF ENVIRONMENTAL PROTECTION

## HAZARDOUS WASTE INSPECTION CHECK LIST

### CESQG Checklist - 40 CFR 261.5

#### Requirements:

This section provides an opportunity for the department inspector to add a narrative explaining any requirements identified as "Not Ok" at the time of the inspection. Some requirements may be identified as "Ok" but are discussed further in the "areas of concern" portion of the narrative section.

Standards for Conditionally Exempt Small Quantity Generators Completed		Ok	Not Ok	Unk	N/A
7.1	Does the facility generate less than 100 kg/mo (220 lb/mo) of all hazardous wastes? And less than 1kg/mo of acutely toxic (P-listed, 40 CFR 262.33) hazardous wastes?	✓			
7.2	Has the facility obtained an EPA ID #? (not required for CESQGs)	✓			
7.3	Is the facility disposing of all its hazardous wastes to facilities permitted to accept the waste?	✓			
7.4	Is the facility disposing of hazardous waste by mixing with used oil?				✓
7.5	Can the facility document proper disposal of all hazardous wastes?	✓			
7.6	Are any hazardous wastes treated or disposed of on site? If yes, describe in Narrative				✓
7.7	Are there any unpermitted discharges of other wastes to the environment?				✓



# FLORIDA DEPARTMENT OF ENVIRONMENTAL PROTECTION HAZARDOUS WASTE INSPECTION CHECK LIST

## Pre-Inspection Checklist

### Requirements:

This section provides an opportunity for the department inspector to add a narrative explaining any requirements identified as "Not Ok" at the time of the inspection. Some requirements may be identified as "Ok" but are discussed further in the "areas of concern" portion of the narrative section.

Pre-Inspection Review Completed		Ok	Not Ok	Unk	N/A
26.1	Facility failed to notify with the correct status.				✓
26.2	Facility failed to notify change of status.				✓
26.3	Did the facility conduct a waste determination on all wastes generated?				✓



# FLORIDA DEPARTMENT OF ENVIRONMENTAL PROTECTION

## HAZARDOUS WASTE INSPECTION CHECK LIST

### Used Oil Marketer

#### Requirements:

This section provides an opportunity for the department inspector to add a narrative explaining any requirements identified as "Not Ok" at the time of the inspection. Some requirements may be identified as "Ok" but are discussed further in the "areas of concern" portion of the narrative section.

40 CFR 279 Subpart H -Marketer Standards Completed		Ok	Not Ok	Unk	N/A
27.1	Does the facility direct shipments of off-specification used oil to used oil burners? (except processors who burn incidentally). NOTE: If both this question and 27.1.1 are marked as Not Ok then go back to the Cover Page and de-select this checklist from this inspection.	✓			
27.1.1	Or does the facility first claim that used oil that is to be burned for energy recovery meets the used oil fuel specification. NOTE: If both this question and 27.1 are marked as Not Ok then go back to the Cover Page and de-select this checklist from this inspection.	✓			
27.2	Check other Subparts the marketer complies with. (Must comply with at least one of the following and have EPA ID #, if not, then a violation must be cited.) <input checked="" type="checkbox"/> C -Generator <input checked="" type="checkbox"/> E -Transporter <input checked="" type="checkbox"/> F -Processor <input type="checkbox"/> G -Burner	✓			
27.3	Is the facility registered?	✓			
27.4	Does the marketer only send off specification oil to burners with EPA ID Numbers?	✓			
27.4.1	And approved Industrial Furnaces or Boilers?	✓			
27.5	Does the marketer claim the used oil meets the specification by analysis or by obtaining copies of analyses?	✓			
27.6	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 (All of the following checkboxes must be checked for this question to be marked Ok, otherwise this question must be marked as Not Ok.): <input checked="" type="checkbox"/> Has notified EPA of its used oil management activities? <input checked="" type="checkbox"/> Will only burn off spec oil in an approved device?	✓			
27.7	Do off-specification oil delivery records include (All of the following checkboxes must be checked for this question to be marked Ok, otherwise this question must be marked as Not Ok.): <input checked="" type="checkbox"/> Name & Address of transporter delivering oil? <input checked="" type="checkbox"/> EPA ID # of transporter? <input checked="" type="checkbox"/> Name & Address of receiving burner? <input checked="" type="checkbox"/> EPA ID # of receiving burner? <input checked="" type="checkbox"/> Quantity of oil shipped? <input checked="" type="checkbox"/> Date of shipment?	✓			
27.8	Do on-specification oil delivery records include: <input checked="" type="checkbox"/> Name & Address of receiving facility? <input checked="" type="checkbox"/> Cross reference to analysis or other information used to determine that the oil meets the <input checked="" type="checkbox"/> Quantity of oil shipped? <input checked="" type="checkbox"/> Date of shipment?	✓			
27.9	Does the marketer keep copies of analysis records for three years?	✓			
27.9.1	Does the marketer of on-specification used oil keep delivery records for three years?	✓			
27.9.2	Does the marketer of off-specification used oil keep delivery records for three years?	✓			



FLORIDA DEPARTMENT OF ENVIRONMENTAL PROTECTION  
HAZARDOUS WASTE INSPECTION CHECK LIST

40 CFR 279 Subpart H - Marketer Standards Completed		Ok	Not Ok	Unk	N/A
27.9.2		✓			
27.10	Does the facility maintain records on DEP Form 62-710.901(2), or equivalent form, including type of oil and destination or end use?	✓			
27.11	Does the facility submit annual reports by March 1st?	✓			



# FLORIDA DEPARTMENT OF ENVIRONMENTAL PROTECTION

## HAZARDOUS WASTE INSPECTION CHECK LIST

### Used Oil Processor

#### Requirements:

This section provides an opportunity for the department inspector to add a narrative explaining any requirements identified as "Not Ok" at the time of the inspection. Some requirements may be identified as "Ok" but are discussed further in the "areas of concern" portion of the narrative section.

40 CFR 279 Subpart F -Processor Standards Completed		Ok	Not Ok	Unk	N/A
28.1	Is the facility exempt under any of the following? NOTE: If either of the following checkboxes are checked then go back to the Cover Page and de-select this checklist from this inspection. <input type="checkbox"/> Transporter or burner processing incidental to normal course of operations? <input checked="" type="checkbox"/> Processors who also generate, transport, market, dispose or burn used oil must comply	✓			
28.2	Check other Subparts the marketer complies with. (If any of the following checkboxes are checked, such as Transporter, then also select and complete the corresponding checklist, such as Used Oil Transporter.) <input checked="" type="checkbox"/> C -Generator <input checked="" type="checkbox"/> E -Transporter <input checked="" type="checkbox"/> F -Processor <input type="checkbox"/> G ?Burner	✓			
28.3	Does the processor have an EPA ID Number?	✓			
28.4	Is the processor registered?	✓			
28.5	Does the processor have a used oil processing permit?	✓			
28.6	For new facilities, was the used oil processing permit submitted prior to beginning operation?				✓
28.6.1	For existing facilities, was the notification for renewal submitted 60 days prior to expiration of the general permit?		✓		

Existing Oil Filter Processing Standards-62-710.850 F.A.C. Completed		Ok	Not Ok	Unk	N/A
28.7	Is the Facility a registered used oil filter process? (NOTE: If the facility processes used oil filters then they must be registered as a used oil filter processor, except that oil filter 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.)	✓			
28.8	Are the filters stored in above ground containers which are (All of the following checkboxes must be checked for this question to be marked Ok, otherwise this question must be marked as Not Ok.): <input checked="" type="checkbox"/> In good condition? <input checked="" type="checkbox"/> Closed or otherwise protected from weather? <input checked="" type="checkbox"/> Labeled "Used Oil Filters"? <input checked="" type="checkbox"/> Stored on an oil impervious surface?	✓			
28.9	Are records maintained on DEP Form 62-710.900(2) or equivalent that include destination or end use of the processed filters and name and street address of each destination or end user?	✓			
28.9.1	Are copies kept at the facility's street address for 3 years?	✓			
28.10	Is an Annual Report submitted by March 1 for the previous calendar year summarizing the above records?	✓			

Oil Management Standards-279.54 Completed		Ok	Not Ok	Unk	N/A
28.11	Is used oil stored only in tanks or containers?	✓			





# FLORIDA DEPARTMENT OF ENVIRONMENTAL PROTECTION

## HAZARDOUS WASTE INSPECTION CHECK LIST

Oil Management Standards 279.54 Completed		Ok	Not Ok	Unk	N/A
28.12	If the facility has tanks, do they comply with 62-761 and 62.762 F.A.C. rules?	✓			
28.12.1	Applicable to USTs over 110 gallons and ASTs over 550 gallons. Describe, including number and size of tanks, noting registration numbers if applicable, and compliance status. Refer to the Permit for information about the tanks on site. Regarding question 28.12 the facility appears to comply with the requirements of 62-762 FAC. Regarding questions 29.6 - 29.7.3 answers on this checklist are based on employees' responses.				
28.12.2	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), 62-710.401(6).	✓			
28.13	Are containers and tanks in good condition and not leaking?	✓			
28.14	Are containers provided with secondary containment consisting of walls and floor at a minimum? <input checked="" type="checkbox"/> Is the containment system impervious to oil so as to prevent migration?	✓			
28.15	Are ASTs, UST tank fill lines and containers labeled "used oil"?	✓			
28.16	Does the facility clean up releases of used oil, repairing or replacing any leaking units as applicable?	✓			

General Facility Standards -279.52 Completed		Ok	Not Ok	Unk	N/A
28.17	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?	✓			
28.18	Does the facility have an internal communication or alarm system capable of giving immediate emergency instruction to facility personnel?	✓			
28.19	Is there a telephone, alarm, 2-way radio or other device immediately available and capable of summoning assistance from local fire departments?	✓			
28.19.1	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?	✓			
28.20	Is the fire control equipment adequate?  Describe  Fire extinguishers are present throughout. Note: The answer to question 28.19.1 is based on information provided by employees.	✓			
28.21	Is spill control and decontamination equipment present?	✓			
28.22	If sprinklers, water hoses or foam producing equipment is part of the facility fire control equipment, is water available at adequate volume and pressure?	✓			
28.23	Is the emergency equipment inspected and tested periodically?  Frequency  Annual; Note: The answer to question 28.22 is based on information provided by employees.	✓			
28.24	Is there adequate aisle space to allow unobstructed movement of facility personnel and emergency equipment to any area of the facility where needed?	✓			
28.25	Has the facility made emergency response arrangements with the following:  <input checked="" type="checkbox"/> Fire Department: <input checked="" type="checkbox"/> Police: <input checked="" type="checkbox"/> Hospital: <input checked="" type="checkbox"/> Emergency Response Contractor:	✓			
28.26	If not, has the facility attempted to do so and is the refusal documented?				✓

Contingency Plans and Emergency Response 279.52(b) Completed		Ok	Not Ok	Unk	N/A



# FLORIDA DEPARTMENT OF ENVIRONMENTAL PROTECTION

## HAZARDOUS WASTE INSPECTION CHECK LIST

Contingency Plans and Emergency Response 279.52(b) Completed		OK	Not Ok	Unk	N/A
28.27	Does the facility have a contingency plan?	✓			
28.28	Is it at the facility and easily available?		✓		
28.29	Does the plan include the following? <input checked="" type="checkbox"/> Fire Response Procedure. <input checked="" type="checkbox"/> Spill Response Procedures. <input checked="" type="checkbox"/> Explosion Response Procedures. <input checked="" type="checkbox"/> Instructions for handling contaminated materials & residues. <input checked="" type="checkbox"/> A description of arrangements with local authorities: <input checked="" type="checkbox"/> Emergency Coordinators: <input checked="" type="checkbox"/> Addresses and telephone numbers of Emergency Coordinators. <input checked="" type="checkbox"/> Emergency equipment list. <input checked="" type="checkbox"/> Specifications and capabilities of emergency equipment. <input checked="" type="checkbox"/> Locations of emergency equipment. <input checked="" type="checkbox"/> An evacuation plan and routes. <input checked="" type="checkbox"/> Evacuation/alarm signals. <input checked="" type="checkbox"/> External reporting procedures. <input checked="" type="checkbox"/> Internal recordkeeping requirements.	✓			
28.30	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?	✓			
28.31	Has the plan been distributed to the: <input checked="" type="checkbox"/> Local police <input checked="" type="checkbox"/> Fire department <input checked="" type="checkbox"/> ERT <input checked="" type="checkbox"/> Hospital	✓			
28.32	Is the emergency coordinator authorized to commit funds for incident response?	✓			
28.33	Has the processor noted in the operating record any incidents requiring implementation of the contingency plan?				✓
28.34	Were written reports made within 15 days to the DEP?				✓

Rebuttable Presumption and Analysis Plan 279.53, 279.55 Completed		OK	Not Ok	Unk	N/A
28.35	Does the processor have a written analysis plan to describing 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?	✓			
28.36	Is the 1,000 ppm halogen determination made by testing?	✓			
28.36.1	If so, does the analysis plan cover: <input checked="" type="checkbox"/> Sampling methods? <input checked="" type="checkbox"/> Frequency of sampling? <input checked="" type="checkbox"/> Analytical Methods?	✓			
28.36.2	Is the 1,000 ppm halogen determination made by process knowledge?				✓
28.36.3	If so, is the type of information that will be used to determine the halogen content stated in the analysis plan?				✓



# FLORIDA DEPARTMENT OF ENVIRONMENTAL PROTECTION

## HAZARDOUS WASTE INSPECTION CHECK LIST

Rebuttable Presumption and Analysis Plan 279.53, 279.55 Completed		Ok	Not Ok	Unk	N/A
28.36.3					✓
28.37	Have any analyses exceeded the 1,000 ppm level? <input type="checkbox"/> If so, was the oil managed as hazardous waste? <input type="checkbox"/> If not, was the oil exempt? Describe basis for presumption rebuttal in narrative, (ex.				✓
28.38	Is the used oil fuel specification determination made by testing?	✓			
28.38.1	If so, does the analysis plan cover: <input checked="" type="checkbox"/> Sampling methods? <input checked="" type="checkbox"/> Whether the oil will be tested before or after processing? <input checked="" type="checkbox"/> Frequency of sampling? <input checked="" type="checkbox"/> Analytical Methods?	✓			
28.38.2	Is the used oil fuel specification determination made by process knowledge?				✓
28.38.2.1	If so, is the type of information that will be used to determine the halogen content stated in the analysis plan?				✓
28.39	Are all oil processing residues managed in accordance with (279.10(e))?	✓			
28.39.1	If not, has the processor conducted a hazardous waste determination?				✓
28.40	Are test records or copies of records providing basis for determinations kept at the facility?	✓			

Recordkeeping and Reporting 279.57, 62-710.510-520 F.A.C. Completed		Ok	Not Ok	Unk	N/A
28.41	Do used oil acceptance records include:		✓		
28.41.1	Name & address of the generator or off site source of the used oil?	✓			
28.41.2	EPA ID # of oil provider (if applicable)?		✓		
28.41.3	Name & Address of the transporter delivering the oil to the facility?	✓			
28.41.4	EPA ID # of the transporter delivering the oil?	✓			
28.41.5	Quantity of oil shipped?	✓			
28.41.6	Type of oil received?	✓			
28.41.7	Date of shipment?	✓			
28.42	Do used oil delivery records include (also check marketer requirements):	✓			
28.42.1	Name & Address of receiving facility? (burner, processor or disposal site)	✓			
28.42.2	EPA ID # of receiving facility?	✓			
28.42.3	Name & Address of transporter delivering the oil?	✓			
28.42.4	EPA ID # of transporter?	✓			
28.42.5	Quantity of oil delivered?	✓			
28.42.6	End Use of the oil?	✓			
28.42.7	Date of delivery?	✓			



# FLORIDA DEPARTMENT OF ENVIRONMENTAL PROTECTION HAZARDOUS WASTE INSPECTION CHECK LIST

Recordkeeping and Reporting -279.57; 62-710.510-520 F.A.C. Completed		OK	Not Ok	Unk	N/A
28.43	Does the facility keep records on DEP Form 62-710.900(2) or equivalent?	✓			
28.44	Does the facility submit an annual report by March 1 summarizing the on site records for the previous calendar year?	✓			
28.44.1	If not, is the facility an electric utility processing only self generated used oil for recycling which is exempt from state reporting requirements?				✓
28.45	Does the transporter keep copies of the record and reports for three years at the street address of the facility?	✓			

Closure -62-710:800(3) F.A.C. and 279:54(h) Completed		OK	Not Ok	Unk	N/A
28.46	Has the facility submitted a written closure plan?				
	<input checked="" type="checkbox"/> Does the plan include procedures for removing containers of oil and residues? <input checked="" type="checkbox"/> Cleaning and decontaminating tanks and ancillary equipment? <input checked="" type="checkbox"/> Removing contaminated soils? <input checked="" type="checkbox"/> Eliminating the need for further maintenance?	✓			
	If the facility operated tank systems, and not all contaminated soils can be practicably				



# FLORIDA DEPARTMENT OF ENVIRONMENTAL PROTECTION

## HAZARDOUS WASTE INSPECTION CHECK LIST

### Used Oil Transporter

#### Requirements:

This section provides an opportunity for the department inspector to add a narrative explaining any requirements identified as "Not Ok" at the time of the inspection. Some requirements may be identified as "Ok" but are discussed further in the "areas of concern" portion of the narrative section.

40 CFR 279 Subpart E - Transporter Standards Completed		Ok	Not Ok	Unk	N/A
29.1	Is the facility exempt under any of the following? 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				✓
29.2	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).				✓
29.3	Does the transporter process used oil beyond what would be considered incidental to transport?	✓			
29.3.1	If 'yes' are they in compliance with 279 Subpart F?	✓			
29.4	Has the facility notified of used oil activities? Check EPA form 8700-12.	✓			
29.5	Does the transporter only deliver used oil to other transporters, oil processors, off specification used oil burners with EPA ID numbers?	✓			
29.6	Does the transporter comply with DOT requirements?	✓			
29.7	If any oil is discharged during transport, does the transporter:				
29.7.1	Notify National Response Center and State Warning Point and Coast Guard per 33 CFR 153.203, as applicable?	✓			
29.7.2	Report to DOT in writing per 49 CFR 171.16?	✓			
29.7.3	Clean up any discharges until the discharge poses no threat?	✓			
29.8	Does the facility also transport used oil filters?	✓			
29.8.1	If so, are the filters stored in above ground containers which are:				
29.8.1.1	In good condition?				✓
29.8.1.2	Closed or otherwise protected from weather?				✓
29.8.1.3	Labeled "Used Oil Filters"?				✓
29.8.1.4	Stored on an oil impervious surface?				✓

Transporter Recordkeeping - 279.46 Completed		Ok	Not Ok	Unk	N/A
29.9	Do used oil acceptance records include:				
29.9.1	Name & Address of facility providing the oil for transport?	✓			
29.9.2	EPA ID # of oil provider?		✓		
29.9.3	Quantity of oil shipped?	✓			
29.9.4	Date of acceptance?	✓			
29.9.5	Signature of oil provider, dated upon receipt?	✓			



# FLORIDA DEPARTMENT OF ENVIRONMENTAL PROTECTION

## HAZARDOUS WASTE INSPECTION CHECK LIST

Transporter Recordkeeping -279.46 Completed		Ok	Not Ok	Unk	N/A
29.9.5		✓			
29.10	Do used oil delivery records include:				
29.10.1	Name & Address of receiving facility or transporter?	✓			
29.10.2	EPA ID # of receiving facility or transporter?	✓			
29.10.3	Quantity of oil delivered?	✓			
29.10.4	Date of delivery?	✓			
29.10.5	Signature of oil receiver, dated upon receipt?	✓			
29.11	Do the above records also include:				
29.11.1	State required information on the type of oil?	✓			
29.11.2	Destination or end use?	✓			
29.12	Does the facility keep records on DEP Form 62-710.901(2) or equivalent?	✓			
29.13	Does the facility submit an annual report by March 1 summarizing the on site records for the previous calendar year?	✓			
29.13.1	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?				✓
29.14	Does the transporter keep copies of the record and reports for three years at the street address of the facility?	✓			

Transporter Certification (62-710 F.A.C.) Completed		Ok	Not Ok	Unk	N/A
29.15	Is the transporter certified? (local governments, and < 55g/time transporters are exempt)	✓			
29.16	Does the facility maintain training records?	✓			
29.17	Does the facility maintain insurance or financial assurance of \$100,000 combined single limit?	✓			
29.18	Is the facility registration form and ID number displayed?	✓			

Transfer Facility Standards -279.45 Completed		Ok	Not Ok	Unk	N/A
29.19	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.				✓
29.19.1	Is the transfer facility registered per 62-710.500(1)(a) F.A.C?				✓
29.20	Does the transporter determine whether used oil stored at a transfer facility has total halogen content above or below 1,000 ppm?				✓
29.20.1	Is this done by testing?				✓
29.20.2	Is this done by process knowledge? Describe basis				✓
29.20.3	Are test records or copies of records providing basis for determination kept for 3 years?				✓
29.21	Have any analyses showed Exceedence of the 1,000 ppm level?				✓
29.21.1	If so, was the oil managed as hazardous waste?				✓
29.21.2	If not, was the oil exempt?				✓





# FLORIDA DEPARTMENT OF ENVIRONMENTAL PROTECTION HAZARDOUS WASTE INSPECTION CHECK LIST

Transfer Facility Standards -279.45 Completed		OK	Not Ok	Unk	N/A
29.21.2	Describe				✓
29.22	Is used oil stored only in tanks or containers, or units subject to 264 and 265?				✓
29.23	If the facility has tanks, do they comply with 62-761 and 62.762 rules?				✓
29.23.1	Describe, including number and size of tanks, noting registration numbers if applicable, and compliance status. N/A				
29.23.2	Is secondary containment provided and adequate?				✓
29.24	Are containers and tank trailers in good condition and not leaking?				✓
29.25	Are containers provided with secondary containment with minimum requirements?				✓
29.25.1	Is the containment system impervious to oil so as to prevent migration?				✓
29.26	Are ASTs, UST tank fill lines and containers labeled "used oil"?				✓
29.27	Are used oil filters generated off-site stored more than 10 days?				✓
29.27.1	If so, is the facility a registered used oil filter transfer facility?				✓
29.28	Does the facility stop operations and clean up releases of used oil, repairing or replacing any leaking units as applicable?				✓

## Honey, Kelly

---

**From:** Richard Dillen [rdillen@howcousa.com]  
**Sent:** Monday, September 29, 2008 1:34 PM  
**To:** Honey, Kelly; Lee Morris  
**Cc:** Knauss, Elizabeth  
**Subject:** RE: YTD SW report  
**Attachments:** SW\_ANNUAL08.xls

Kelly,

Attached is the YTD SW-Report (9/1/07 thru 8/31/08).

Richard.

---

**From:** Honey, Kelly [mailto:Kelly.Honey@dep.state.fl.us]  
**Sent:** Monday, September 29, 2008 12:35 PM  
**To:** Richard Dillen; Lee Morris  
**Cc:** Knauss, Elizabeth  
**Subject:** YTD SW report  
**Importance:** High

Hi Richard and Lee,

If you are still planning on submitting different time frames for the YTD SW report (disposed v. recycled), I need it ASAP. I have to submit my report soon (as in today). If I don't get it from you before then, I will have to use the figures from the report that was available during the inspection.

Also, did you decide whether you still want Beth and me to call you this afternoon?

*Kelly Honey  
FL Department of Environmental Protection*

*RCRA Compliance and Enforcement  
T: 813/632-7600, ext. 369*

*F: 813/632-7664*

Please Note: Florida has a very broad public records law. Most written communications to or from state officials regarding state business are public records available to the public and media upon request. Your e-mail communications may therefore be subject to public disclosure.

*The Department of Environmental Protection values your feedback as a customer. DEP Secretary Michael W. Sole is committed to continuously assessing and improving the level and quality of services provided to you. Please take a few minutes to comment on the quality of service you received. Simply click on [this link to the DEP Customer Survey](#). Thank you in advance for completing the survey.*

No virus found in this incoming message.

INSERTED BY AVG.

Version: 7.5.524 / Virus Database: 270.7.5/1697 - Release Date: 9/29/2008 7:40 AM

MAR 09 2009

INITIAL *ML*

**HOWCO Environmental Services**

Solid Waste Report

September-07

All numbers are in Gallons

Item	Start Inventory	Received/ Generated	Stop Inventory	Processed	Recycled	WTE	Landfilled
Drummed waste	1925	3135	55	5005	0	0	5005
O.W.S. Sludge	19000	1826	19000	1826	1826	0	0
Waterplant Sludge	0	12000	0	12000	9600	0	2400
Processed SW	4040		0	Total	11426	0	7405
		September-07	Avg. %				
Percentile Landfilled		39	39				
Percentile Recycled		61	61				

Roll-Off On-Site

## Honey, Kelly

---

**From:** Knauss, Elizabeth  
**Sent:** Friday, September 26, 2008 4:39 PM  
**To:** 'Lee Morris'; Honey, Kelly  
**Cc:** Richard Dillen; Dregne, James  
**Subject:** RE: Outstanding corrective actions - XRF analysis

As far as your recordkeeping goes, we would want to see a bound notebook that shows:

Information on instrument calibration, maintenance and repair

"The laboratory should maintain an equipment/instrument description list that includes the manufacturer, model number, year of purchase, accessories, and any modifications, updates, or upgrades that have been made."

For each sample, the log book should document in chronological order; Date and time collected, name of sampler, source of sample (for example truck 123 front compartment) date and time of analysis, analysis number from the machine's printout, analytical results, and name of analyst. If any sample cleanup is done, (such as centrifuging to remove water) it should be documented.

This should also include blanks, duplicates and matrix spikes. During the inspection, it appeared that you were not running any QA/QC analyses, and that calibrations were not done regularly. From EPA method 9075..

### 8.0 QUALITY CONTROL

8.1 Refer to Chapter One for specific quality control procedures.

8.2 One sample in ten should be analyzed in triplicate and the relative standard deviation reported. For each triplicate, a separate preparation should be made, starting from the original sample.

8.3 Each sample, or one sample in ten from a group of similar samples, should be spiked with the elements of interest by adding a known amount of chlorine or sulfur to the sample. The spiked amount should be between 50% and 200% of the sample concentration, but the minimum addition should be at least five times the limit of detection. The percent recovery should be reported and should be between 80% and 120%. Any sample suspected of containing >25% water should also be spiked with organic chlorine.

8.4 Quality control standard check samples should be analyzed every day and should agree within 10% of the expected value of the standard.

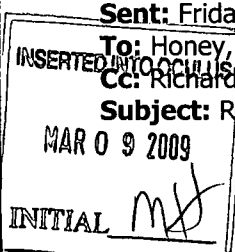
EPA has posted a memo regarding oil halogen testing on their web site.

<http://www.epa.gov/epawaste/hazard/testmethods/pdfs/uoil.pdf>

Your instrument manual may have information that provides for alternatives to the SW 845 method's frequency of matrix spike samples and duplicates. However, you should have a lab QA plan for this analytical method that addresses this and documents the source for the suggested frequency of calibrations and QA analyses.

---

**From:** Lee Morris [mailto:LeeMorris@howcousa.com]  
**Sent:** Friday, September 26, 2008 10:40 AM  
**To:** Honey, Kelly  
**Cc:** Richard Dillen; Knauss, Elizabeth  
**Subject:** RE: Outstanding corrective actions



Kelly,

Not a problem....Would it be possible for us to conference on Monday? Richard has to leave today by 4pm and neither us know when Beth will be openly available after 3:30pm, so if we can come up with a time on Monday that would be great! I've got a staff meeting Monday at 10am, so anytime before 10am or after 1pm would work out. Once you give me a time, I will make sure to be with Richard in the lab. You can just call us on my cell @ 727-543-5429 and I'll put it on speaker.

Thanks,

**Lee A. Morris**

Director – Operations/Transportation  
Howco Environmental Services  
Cell: 727-543-5429

---

**From:** Honey, Kelly [mailto:Kelly.Honey@dep.state.fl.us]

**Sent:** Friday, September 26, 2008 10:17 AM

**To:** Lee Morris

**Cc:** Richard Dillen; Knauss, Elizabeth

**Subject:** RE: Outstanding corrective actions

Hi Lee,

Thanks for responding so quickly! It's no problem to call and discuss the SOP documentation requirements, but Beth will be in meetings today until around 3:30 pm. I think she'll be available the call after that, but I'll need to verify that.

If you want, we can call you or Richard this afternoon to talk about it rather than you calling us. Beth's really the contact on this, but I believe it all boils down to keeping a log book next to the unit, assigning an ID number to each sample and then logging the date and the results sequentially for every sample.

So let me know if you want us to call you this afternoon, and if so, please give me a telephone number for the call.

Thanks, Lee!

-kelly

---

**From:** Lee Morris [mailto:LeeMorris@howcousa.com]

**Sent:** Friday, September 26, 2008 9:48 AM

**To:** Honey, Kelly

**Cc:** Richard Dillen; Knauss, Elizabeth

**Subject:** RE: Outstanding corrective actions

Good Morning Kelly,

In response to the first item (product containers), September 18<sup>th</sup>, we sorted through the cans of product, cleaned the area, and rearranged the remaining cans for future use. The balance of the cans we placed in a labeled 55 gallon drum for disposal. There are 17, one gallon cans, in the drum for disposal. Dave Roehm (Environmental Manager) will make arrangements to dispose of the drum. Attached are pictures of the cleaned up area with the remaining cans and a picture of the labeled drum for disposal.

## Honey, Kelly

---

**From:** Lee Morris [LeeMorris@howcousa.com]  
**Sent:** Friday, September 26, 2008 10:17 AM  
**To:** Honey, Kelly; Knauss, Elizabeth  
**Cc:** Richard Dillen  
**Subject:** FW:  
**Attachments:** drum containment 1.jpg; drum containment.jpg

Kelly,

Here are the pictures of the drum containment pan behind the lab. As you can see it is clean and empty!

Get back to you shortly on the balance of the corrective actions.

Thank you,

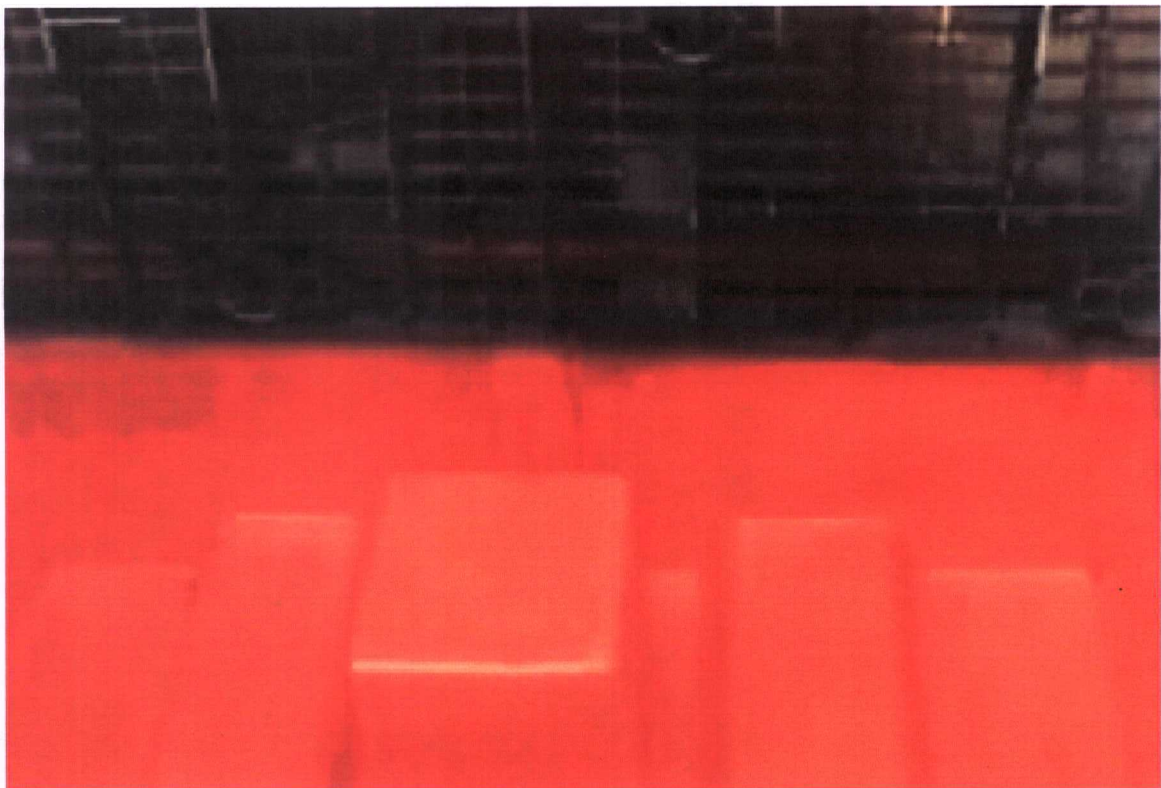
Lee A. Morris  
Director - Operations/Transportation  
Howco Environmental Services  
Cell: 727-543-5429

INSERTED INTO OCULUS

MAR 09 2009

INITIAL *RM*





## Honey, Kelly

---

**From:** Lee Morris [LeeMorris@howcousa.com]  
**Sent:** Friday, September 26, 2008 9:48 AM  
**To:** Honey, Kelly  
**Cc:** Richard Dillen; Knauss, Elizabeth  
**Subject:** RE: Outstanding corrective actions  
**Attachments:** Remaining Cans.jpg; Labeled Drum.jpg

Good Morning Kelly,

In response to the first item (product containers), September 18<sup>th</sup>, we sorted through the cans of product, cleaned the area, and rearranged the remaining cans for future use. The balance of the cans we placed in a labeled 55 gallon drum for disposal. There are 17, one gallon cans, in the drum for disposal. Dave Roehm (Environmental Manager) will make arrangements to dispose of the drum. Attached are pictures of the cleaned up area with the remaining cans and a picture of the labeled drum for disposal.

Richard and I will work together today formatting the response for the balance of the issues. However, we would like to call you today to further discuss our response to the XRF concerns. We would like to open the discussion to get an understanding of the department SOP FD 1000 requirements and how it applies to us.

Thank you for your patience, we'll talk to you soon.

Have a good day!

Kind Regards,

**Lee A. Morris**

Director – Operations/Transportation  
Howco Environmental Services  
Cell: 727-543-5429

---

**From:** Honey, Kelly [mailto:Kelly.Honey@dep.state.fl.us]  
**Sent:** Thursday, September 25, 2008 5:47 PM  
**To:** Lee Morris  
**Cc:** Richard Dillen; Knauss, Elizabeth  
**Subject:** Outstanding corrective actions  
**Importance:** High

Hi Lee,

During my records review on September 5, 2008, at the main office, you said you were going to send me some stuff, including documentation of corrective actions. I have not yet received anything from either you or Richard.

The outstanding issues are:

- There were some product containers observed in Trailer #2 that were in poor condition, and some had leaked onto the floor of the trailer. This was to have been cleaned up, and the inventory culled of unusable materials. Please send photos of the cleaned up trailer, and if the materials have already been disposed of, send copies of the associated documentation.





## Honey, Kelly

---

**From:** Honey, Kelly  
**Sent:** Thursday, September 25, 2008 5:47 PM  
**To:** 'Lee Morris'  
**Cc:** 'rdillen@howcousa.com'; Knauss, Elizabeth  
**Subject:** Outstanding corrective actions

**Importance:** High

Hi Lee,

During my records review on September 5, 2008, at the main office, you said you were going to send me some stuff, including documentation of corrective actions. I have not yet received anything from either you or Richard.

The outstanding issues are:

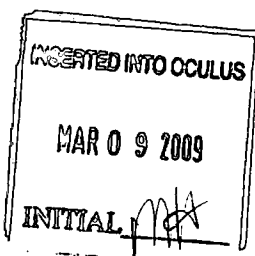
- There were some product containers observed in Trailer #2 that were in poor condition, and some had leaked onto the floor of the trailer. This was to have been cleaned up, and the inventory culled of unusable materials. Please send photos of the cleaned up trailer, and if the materials have already been disposed of, send copies of the associated documentation.
- The containment pan for the used oil containers behind the laboratory needed to be pumped out. Please send me photos of the emptied containment.
- There was an issue with the year-to-date (YTD) logs of solid waste disposed of versus solid waste recycled. The records available at the time of the inspection clearly indicated that HOWCO was in violation of its permit regarding this issue. Richard was going to provide me with different YTD time frames (e.g. Aug – Jul, Jan – Dec, etc.) but I still don't have it. Please send me the YTD information.
- Richard contacted the manufacturer about an internal log for the XRF unit in the laboratory and was told it did not have that capability. **PLEASE NOTE:** A sample log must be kept in accordance with Department SOP FD 1000. **Begin keeping this log immediately.**
- There was an issue with training documentation for one of the designated emergency Coordinators (Tim, Sr.). HOWCO needs to remove all unqualified personnel from the list or provide appropriate, documented training for all designated emergency coordinators.

Thanks for your attention, Lee. Please call me if you have any questions. Have a good day.

Sincerely,  
Kelly Honey  
FL Department of Environmental Protection  
RCRA Compliance and Enforcement  
T: 813/632-7600, ext. 369  
F: 813/632-7664

Please Note: Florida has a very broad public records law. Most written communications to or from state officials regarding state business are public records available to the public and media upon request. Your e-mail communications may therefore be subject to public disclosure.

Tracking:



**Recipient**

'Lee Morris'

'rdillen@howcousa.com'

Knauss, Elizabeth

**Delivery**

Delivered: 9/25/2008 5:47 PM

## DOCUMENTS AND RECORDKEEPING

<input checked="" type="checkbox"/> Permit Application. <i>Richard's office</i>	<input type="checkbox"/> Operating Permit.  MO
<input checked="" type="checkbox"/> Validated Annual Used Oil Registration [Form 62-701.900(13)]. MO <i>ISSUED 7-31-09</i> <i>EXP. 6-30-09</i>	<input checked="" type="checkbox"/> Annual Used Oil Recovery Report. 2007? <i>U.O. - 8670,813-G; UOF - 3,460,750 lbs</i>
<input checked="" type="checkbox"/> Annual DEP Registration Placard For Storage Tanks. 2008-2009 MO	<input checked="" type="checkbox"/> Contingency Plan. <i>05-14-07 revision *</i>
<input checked="" type="checkbox"/> Training Logs.  MO	<input checked="" type="checkbox"/> Closure Plan.
<input checked="" type="checkbox"/> Results of Annual Waste Analyses For All Solid Waste Streams <b>Disposed</b> . <i>06-03-08 - Full TCLP - Phoslab</i>	<input checked="" type="checkbox"/> Annual Closure Cost Update <i>\$97,393.71 4-24-08 approval</i>
<input checked="" type="checkbox"/> Results of Annual Waste Analyses For All Solid Waste Streams <b>Received</b> From Generators.	<input checked="" type="checkbox"/> Transporter Liability Insurance [\$100,000 minimum]. <i>to 07-02-09 \$1,000,000 / \$2,000,000</i>
<input checked="" type="checkbox"/> Processed Oil Sampling Logs [Minimum Of One Sample Every Two Weeks].	<input checked="" type="checkbox"/> Monthly Inspection Logs Of The Solids Storage and Sludge Separation Areas.
<input checked="" type="checkbox"/> Tank Inspections and Monthly Release Detection Monitoring.	<input checked="" type="checkbox"/> Annual Analyses Of WWT and OES Sludges. <i>Full-TCLP 110-12-21-07 - full TCLP; WWT - 12-20-07</i>
<input checked="" type="checkbox"/> Analysis Of Vibrascreen Filter Solids and Tank Bottom Sludges ⇒ [Unless Processed In Tanks 110 or 111].	<input checked="" type="checkbox"/> Generator Non-Haz Demonstration For Used Antifreeze. <i>N/A - recycled</i>
<input checked="" type="checkbox"/> Documentation Of Annual Closure Cost Estimate [Solid Waste Processing] - N/A <i>Now part of UOP closing costs estimate</i>	<input checked="" type="checkbox"/> Records Of Refused Used Oil Shipments  <i>none refused</i>
<input checked="" type="checkbox"/> Records Of Quantities Of Waste Received, Stored, Processed and Disposed. <i>as of May 52% land fill *</i>	Documentation Of Annual Financial Assurance [Solid Waste Processing] DEP Approved 5/9/05 Next Submittal by 3/1/06 <i>N/A</i>
<input checked="" type="checkbox"/> Records Of Disposal Or Treatment Facility For All Solid Wastes Removed [Name and Location].	<input checked="" type="checkbox"/> Quarterly Submittals Of Material Balance Of Quantities Of Solid Waste. <i>N/A</i>
<input checked="" type="checkbox"/> Copies Of Permits For Facilities Receiving Processed Wastes.	<input checked="" type="checkbox"/> Monthly Solid Waste Inspection / Corrective Actions Logs.
<input checked="" type="checkbox"/> Monthly Inspection Logs Of Safety and Emergency Equipment.	<input type="checkbox"/> Manifests / Bill-Of-Lading. <i>MO</i>  CHECK to see if CESQG status

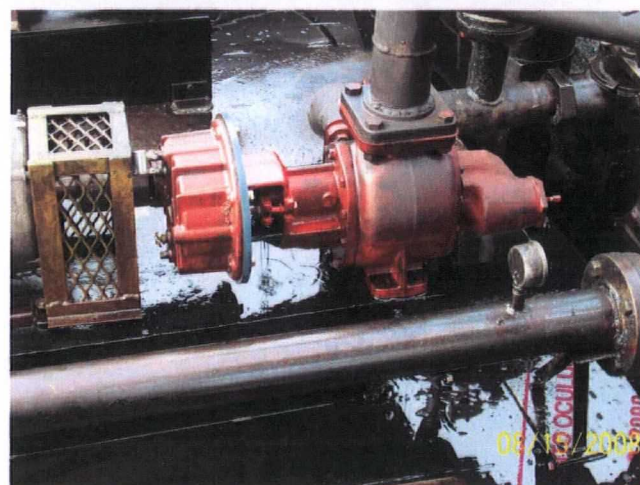
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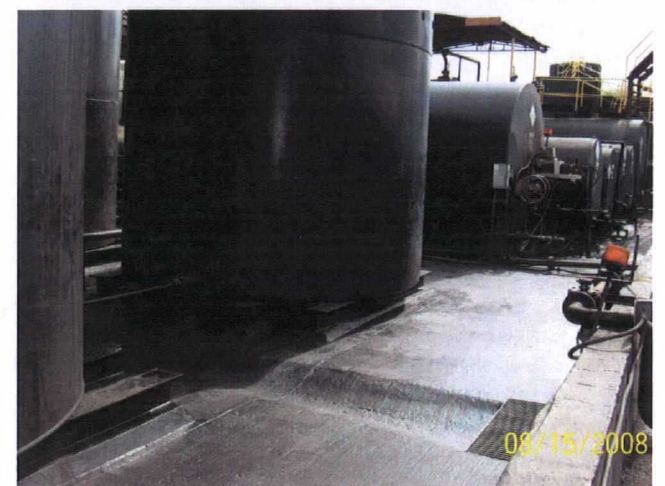
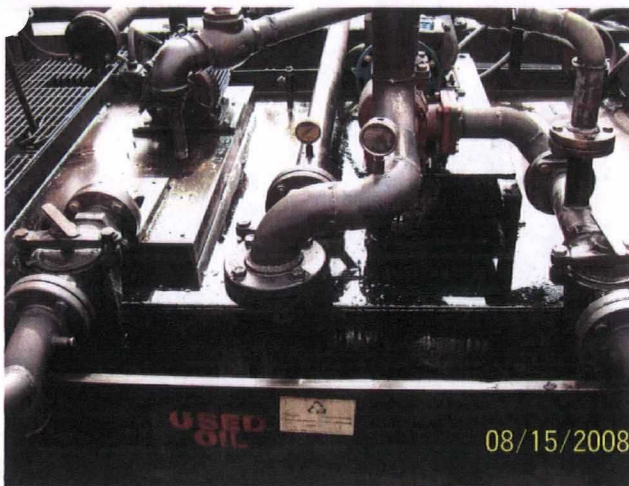
*\* had to look for it as of 12/07 YTD - 40% land filled - well under allowable volume, however MO = main office*



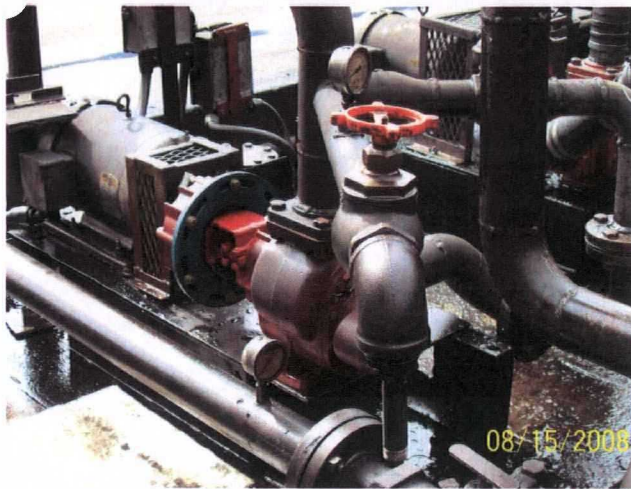
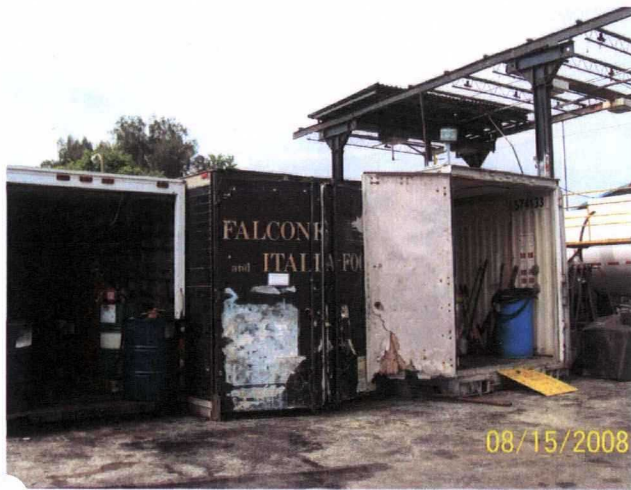


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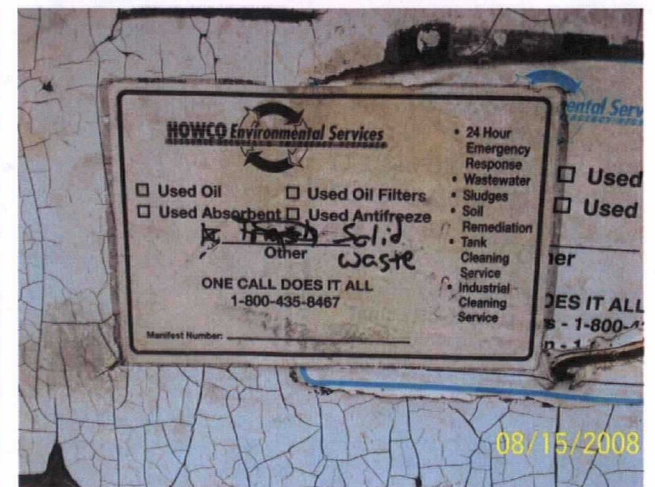
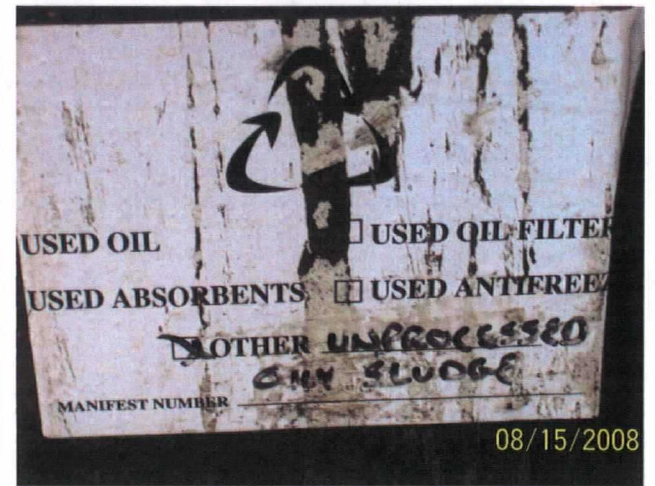








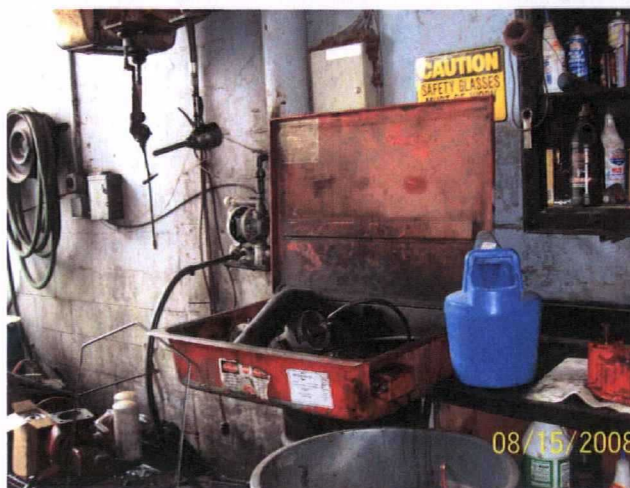




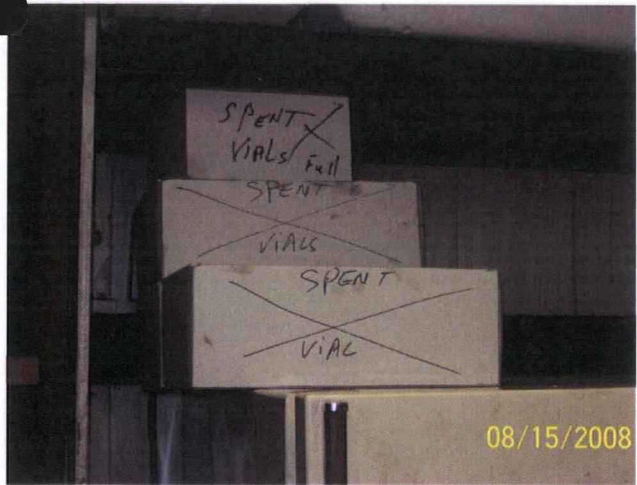












Memorandum

Environmental Protection

SOUTHWEST DISTRICT ENFORCEMENT COVER MEMO

TO: JD James Dregne, Hazardous Waste Program Manager *425*

FROM: VD Kelly Honey, Environmental Specialist III

DATE: February 25, 2008

*mailed 2/27/08*  
*CK*

FILE NAME: HOWCO Environmental Services

COUNTY: Pinellas

PROGRAM: Hazardous Waste

PROJECT # 308684

TYPE OF DOCUMENT: Inspection Report and Cover Letter

REQUESTED ACTION: APPROVAL

DESCRIPTION OF VIOLATIONS:

The facility failed to record the results of one halogen test.

STATUS OF CORRECTIVE ACTIONS:

Prior to the Department's next annual inspection, HOWCO must address the issue of deteriorating asphalt and ensure that the surface of the Yard meets all requirements.

STATUS OF PENALTY ASSESSMENT:

N/A

PENALTY: ☒ Not Applicable

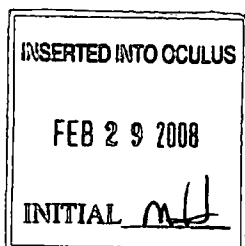
Amount:

Costs & Expenses:

Total: N/A

Secretary Approval ☒ Not required / Approved on \_\_\_\_\_

Attachments: Inspection Report and Cover Letter





# Florida Department of Environmental Protection

Southwest District Office  
13051 North Telecom Parkway  
Temple Terrace, Florida 33637-0926

Charlie Crist  
Governor

Jeff Kottkamp  
Lt. Governor

Michael W. Sole  
Secretary

February 27, 2008

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

Re: Project #308684  
HOWCO Environmental Services  
EPA ID #FLD 152 764 767  
Pinellas County

Dear Mr. Hagan:

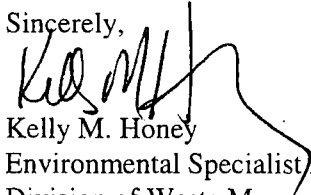
Thank you for the assistance of your staff during the RCRA compliance inspection conducted on September 19, 2007.

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 violation of one RCRA regulation governing used oil processors. The violation is set forth in the "Summary of Violations" section 10 of the inspection report.

Subsequent review of documentation provided by HOWCO Environmental Services, indicates that the violation cited in the "Summary of Violations" has been corrected. Having returned to compliance, no enforcement action will be taken. Please note that prior to the Department's next routine inspection of HOWCO, the issue of the deteriorating asphalt needs to be addressed. HOWCO must ensure that there is no release of used oil or used oil constituents through the asphalt to the environment.

Your continued cooperation is appreciated. If you have any questions please call me at (813) 632-7600, extension 369.

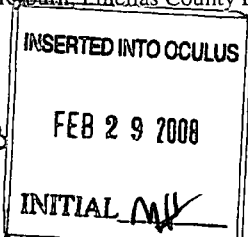
Sincerely,

  
Kelly M. Honey  
Environmental Specialist/III  
Division of Waste Management  
Southwest District

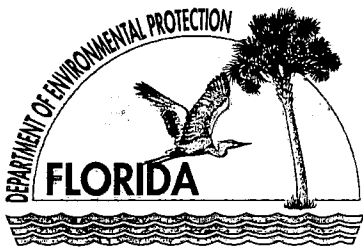
/kmh

enclosure

cc: Charles Ryburn, Pinellas County Environmental Management Department



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# Florida Department of Environmental Protection

Southwest District Office  
13051 North Telecom Parkway  
Temple Terrace, Florida 33637-0926

Charlie Crist  
Governor

Jeff Kottkamp  
Lt. Governor

Michael W. Sole  
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 43<sup>rd</sup> Street South, St. Petersburg, FL 33711

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

COUNTY Pinellas PHONE (727) 328-7403 DATE September 19, 2007 TIME 9:50 am

**NOTIFIED AS:** ☐ 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: Processor, Transporter
- ☒ Used Oil Filters: Processor, Transporter

**CURRENT STATUS:**

- ☒ 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: Processor, Transporter
- ☒ Used Oil Filters: Processor, Transporter

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 checked="" type="checkbox"/> 40 CFR 266  | <input checked="" type="checkbox"/> 40 CFR 268  | <input checked="" 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:**

Richard Dillen; Lee Morris - HOWCO

James Dregne; Kelly Honey - FDEP

5. **LATITUDE/LONGITUDE:** 27° 45' 40.80" 82° 41' 32.55"

6. **SIC Code:** 5093, 2992 **NAICS Code:** 423930, 324191

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

INSERTED INTO SCULUS

FEB 29 2008

INITIAL mb

PERMIT #: 33721-HO-001

ISSUE DATE: July 10, 2007

EXP. DATE: August 03, 2010

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## **9. Facility Description:**

HOWCO Environmental Services (HOWCO) was inspected on September 19, 2007, to evaluate the facility's compliance with state and federal hazardous waste regulations. The inspectors were accompanied throughout the inspection by Richard Dillen, who manages the Laboratory, and Lee Morris, who manages the Yard. The facility was last inspected by the Department of Environmental Protection (Department) on November 7, 2005.

HOWCO stores, processes and markets used oil and is a registered used oil filter transporter and processor, as well. Additionally, HOWCO accepts oily waste solids which are processed and solidified prior to disposal at a landfill. HazMat supplies are stored in one of three large trailers on the south side of the property. The contents of the HazMat trailer included drums of fire suppression foam, as well as spill control equipment. Also in this trailer were numerous cans of paints and coatings. As discussed, the Department recommends evaluating the contents of the trailer and removing unnecessary items.

Since the previous inspection, the overall condition of the yard and processing areas appeared much improved with respect to container management and accessibility. Additionally, the level of knowledge of the Yard staff appeared much greater than in previous inspections, with staff being familiar with the contents of various containers when asked. Some stormwater was observed in the secondary containment, and staff indicated that it would be removed within a week of the rainfall event, as required. The facility's bullhorn was tested and found to be operable. The fire and emergency equipment are inspected monthly and tested annually.

The used oil filter processing area is now covered. At the time of the inspection, there were six 55-gallon drums of used oil filters staged in front of the filter crusher. All the drums were properly managed. Oily trash is picked out of the drums of filters and disposed of to the incinerator with the rest of the oily wastes. In the uncovered storage area outside the filter processing area, there were forty 55-gallon drums of used oil filters. These containers were all properly managed, as well. A drum of crushed filters and another of used absorbent were also observed. Crushed used oil filters are shipped to a smelter. Used oil collected in the crushing unit is transferred to tank #109.

The Shaker Assembly is the last point of processing. Oil is run through the shaker, and the processed oil is transferred to tank #134. Residue from the shaker system is collected next to the assembly in a labeled container and then placed into tank #133 for eventual transfer to a sludge tank. Sludge from the wastewater treatment unit (WTU) is collected in tank #108, and then transferred to a press. The press is operated approximately once a week.

Solid waste managed at the facility includes oily solid waste generated by HOWCO and its clients. The solidified wastes are managed as nonhazardous material. Since the previous inspection, the Solid Waste Pad was completely covered with steel installed over a liner, making it impervious and addressing the Department's concerns about the coated concrete pad. Sludge from the filter press is stored here until it is shipped for disposal, but at the time of the inspection, there was no sludge in storage. The only solid waste observed was a roll-off container of 'filter blocks,' which are compacted used oil filters. The roll-off was covered and labeled. A covered, labeled trailer of used oil "filter blocks" was also observed, as well as several empty trailers and roll-offs.

Much of the Yard is covered with asphalt. Asphalt is a relatively soft material and is somewhat susceptible to damage from forklifts and other heavy equipment, especially when hot. Additionally, it dissolves when exposed to used oil over time. The Department has concerns about the impermeability of the asphalted surfaces.

During the walkthrough of the Yard, the Department observed several portions of the asphalt that appeared to be compromised either physically (i.e., gouged, scraped, etc.) or chemically (i.e., degraded from exposure to used oil). Specifically, in front of the trailer bay, around the empty roll-offs, and in the empty drum storage area, the asphalt is deteriorating and appears seriously weakened. Gouges from heavy equipment are also apparent. Used oil staining on the asphalt was also noted next to the 'bone yard' near the two tanker trailers used for in-house transport. Be aware that failure to maintain and operate the facility to minimize the possibility of any unplanned sudden or non-sudden release of used oil or used oil constituents to the environment is a violation of Specific Condition I.14.(a) in the facility's operating permit, as well as a violation of CFR 279.52(a)(1). HOWCO needs to address this issue before the Department's next inspection.

The Maintenance Department generates used oil, used antifreeze and oily waste. There is also a ~25-gallon parts washer in use. Wastes observed here include 55-gallon drums of used oil filters, spent sorbents, used oil, used antifreeze and oily rags. There were also some smaller containers like drain pans, and step cans. All the containers were being managed properly, and the used oil and antifreeze were equipped with secondary containment. Batteries are returned to Fleet Pride for core credit. Staff said fluorescent lamps are taken quarterly on CESQG days to the County collection center for disposal, which is also how laboratory wastes are disposed of. The last date of disposal was May 9, 2007.

Behind the laboratory, there were two 55-gallon drums of used oil in secondary containment. The drums were covered and labeled. The drums collect sample waste from the laboratory. Processed oil is randomly sampled biweekly and tested to confirm it is on-spec. Metal analyses are done off site by PhosLab. Samples of processed oil are retained in the laboratory for thirty days. Hazardous COD testing waste is generated in the laboratory, and spent vials are accumulated in a box that was labeled "spent vials."

During this inspection, several of the facility's trucks were inspected to ensure they contained such things as spill kits and other emergency equipment, used oil testing equipment (e.g., Dexsil Chlor-D-Tect® kits) and required paperwork. It was noted that truck #590 had an annual inspection sticker that expired July 2007, and the annual inspection sticker for truck #36 expired May 2007. Truck #36 also had a fire extinguisher that was due for its annual certification in March 2007, although it was still charged and appeared operable. These issues were pointed out to Mr. Dillen and to Mr. Morris. Drivers' credentials, such as licenses, medial clearances and training certificates, were also checked, and several drivers satisfactorily demonstrated proper usage of the halogen 'sniffer' units.

Records were reviewed and found to be complete and up to date with the following exception. On August 6, 2007, used oil was picked up from South Pointe Motor Cars, but there was no documentation of the results of the halogen test, which is a violation of **62-710.510(1)(g), FAC**. This issue was reviewed with drivers by HOWCO on October 17, 2007, and the importance of properly completing the paperwork was emphasized. The facility's contingency plan was updated on January 9, 2006. Ensure that all previous recipients have received copies of the revisions.

One issue was noted with HOWCO's solid waste tracking. HOWCO tracks the amount of solid waste received, generated, processed and shipped, but there did not appear to be a method in place to clearly identify who generated the solid waste in a specific roll-off when it was shipped for disposal. As discussed during the inspection, HOWCO should be able to identify all the respective generators of every load of solid waste shipped for disposal.



**10. Summary of Alleged Violations:**

**62-710.510(1)(g), FAC**

Failure to maintain documentation of halogen screenings in accordance with the requirements of Rule 62-710.600, FAC. (**corrected**)

**11. Recommendations:**

**Specific Condition I.14.(a)  
and CFR 279.52(a)(1).**

Before the Department's next inspection, address the issue of the deteriorated asphalt throughout the Yard, and ensure that the facility is operated so as to minimize the possibility of releasing used oil or used oil constituents through the asphalt to the environment. The Department recommends using a less permeable, more compatible surface than asphalt.

**Other recommendations:**

Improve the solid waste tracking so that each contributor to a load of solid waste can be individually identified.

Ensure that the updated contingency plan has been sent to all previous recipients as required.

Inspected: \_\_\_\_\_

  
Kelly Honey  
Environmental Specialist III

Approved: \_\_\_\_\_

  
James M. Dregne  
Hazardous Waste Program Manager

Date: 2/25/2008

Inspectors: James Dregne, Kelly Honey  
Date: September 19, 2007

## INSPECTION CHECKLIST

*HOWCO Environmental Services  
843 43<sup>rd</sup> Street South  
St. Petersburg, FL 33711  
FLD 152 764 767*

Permit No.	92465-HO06-001	33721-HO-001
Issued	08/03/00	07/10/07
Expires	08/03/05	08/03/2010

Last Inspection 11/07/05

### 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.13 A copy of the operating permit is maintained at the facility. ☒Y   N
- GC.15 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.
- GC.15(b) Records are available of annual WWTS sampling and analyses. ☒Y   N
- GC.15(b) The pre-burn analysis for each shipment of contaminated soil received that will be transferred to a soil treatment facility ☒Y   N
- GC.15(b) The pre-acceptance analyses or waste determinations; ☒Y   N
- GC.15(b) Copies of any analyses required by a disposal facility as a condition of acceptance and documentation of acceptance;   Y   N

#### SC Specific Conditions

##### **Part I. Standard Requirements**

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

- I.9** ☒ Annual used oil recovery reports (62-710.510(4) and (5), FAC) ☒Y   N
- I.11 Training records ☒Y   N

**HOWCO Environmental Services -  
Compliance Evaluation Inspection Checklist**

I.11 The Company's "Used Oil Training Program" is given initially and annually thereafter. XY \_\_ N

I.11 Personnel training is documented. XY \_\_ N

I.14 A copy of the Contingency Plan is maintained onsite. (40 CFR 279.52(b)(3)(i)) XY \_\_ N

I.14 Amendments to the CP are sent to appropriate agencies. \_\_ Y X N

I.14(a) All areas are cleaned to prevent nuisance conditions, hazardous conditions, and minimize releases. (prevention of odor or vector problems not located in new permit) \_\_ Y X N

I.14(b)3 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. XY \_\_ N

I.14(c) Emergency and safety equipment is available, tested and maintained. XY \_\_ N

I.14(e) There is adequate aisle space in all storage areas for inspections. XY \_\_ N

Primary evacuation routes are posted in appropriate locations throughout the facility. (not located in new permit) \_\_ Y \_\_ N

The following are still the Emergency Coordinators: XY \_\_ N

*Director of Operations*  
Lee Morris ~~David Rochm~~ Primary X  
Tim Hagan Alternate  
Tim Morris - Contract ER. AH.

A list of emergency response phone numbers is posted by the phones. (not located in new permit) \_\_ Y \_\_ N

The Contingency Plan was last amended on (date) 7-21-99 1-9-06  
\* Handwritten in The Plan

**Part II. Used Oil Processing Requirements**

II.1 Processed oil is sampled prior to shipping off-site *once every two weeks*. XY \_\_ N

II.1 bc 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 X N

II.1(b) All outgoing materials for disposal are sampled and analyzed annually. XY \_\_ N

II.2 The facility is in compliance with Financial Assurance requirements.  
• Closure costs are submitted annually prior to August 3; XY \_\_ N  
• Annual submittal of proof of financial assurance. XY \_\_ N

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

Page 1 Permit application XY \_\_ N

II.3 Operating record XY \_\_ N

II.3 2(43) Shipping papers include all of the required information as \_\_ Y \_\_ N

**HOWCO Environmental Services**  
**Compliance Evaluation Inspection Checklist**

	stated in 40 CFR 279.56 (Acceptance / Delivery)	
<del>II.3(a)</del> <b>III.1.6)</b>	Results of Waste Analyses	<input checked="" type="checkbox"/> Y <input type="checkbox"/> N
II.3(c)	Manifests and Bill-of-Lading of all shipments	<input checked="" type="checkbox"/> Y <input type="checkbox"/> N
II.4	Inspection records	<input checked="" type="checkbox"/> Y <input type="checkbox"/> N
II.8	Validated annual used oil registration form.	<input checked="" type="checkbox"/> Y <input type="checkbox"/> N
II.6	Solid waste streams generated on site are sampled and analyzed at least annually.	<input checked="" type="checkbox"/> Y <input type="checkbox"/> N
II.7	The facility has submitted its <u>annual</u> Closure Cost Update by March 1.	<input checked="" type="checkbox"/> Y <input type="checkbox"/> N
II.8	The facility has submitted its <u>annual</u> registration by March 1.	<input checked="" type="checkbox"/> Y <input type="checkbox"/> N
<b>Part III. Waste Processing Activities</b>		
III.1	Only permitted waste streams are processed at the facility.	<input checked="" type="checkbox"/> Y <input type="checkbox"/> N
III.1(a)	Operations <b>DO NOT</b> change the chemical characteristics of any of the solid materials.	<input checked="" type="checkbox"/> Y <input type="checkbox"/> N
III.1(a)	All processed and unprocessed solid wastes are <u>stored</u> on the Solid Waste pad.	<input checked="" type="checkbox"/> Y <input type="checkbox"/> N
III.1(b)	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
III.1(b)	A signed waste profile form and analytical data for each waste stream <u>accepted</u> at the facility or for virgin materials, a waste material profile sheet and MSDS	<input checked="" type="checkbox"/> Y <input type="checkbox"/> N
III.1(b)	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
III.1(b)	The determinations are recertified annually and resampled every 5 years .	<input checked="" type="checkbox"/> Y <input type="checkbox"/> N
III.1(c)	Storage of solid waste is at or below 120-tons in roll-offs, plus 22,000-gallons of liquid in drums. Where 15 yd <sup>3</sup> = 3,030 gallons 20 yd <sup>3</sup> = 4,040 gallons	<input checked="" type="checkbox"/> Y <input type="checkbox"/> N
App.Att 4	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 type="checkbox"/> Y <input type="checkbox"/> N
	The facility has notified the Department within 3 days prior to sampling any solid waste streams. (not located in new permit)	<input 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. (not located in new permit)	<input checked="" type="checkbox"/> Y <input type="checkbox"/> N
	All materials are <u>processed</u> on impervious surfaces, tanks or containers.	<input checked="" type="checkbox"/> Y <input type="checkbox"/> N

**HOWCO Environmental Services ~**  
**Compliance Evaluation Inspection Checklist**

(not located in new permit but App.Att 4 states that "oily solids...will be offloaded on a coated concrete pad prior to processing))

Containers of processed wastes are labeled "Processed Solids" or "Processed Solid Waste". (not located in new permit) \_\_Y \_\_N

There is no evidence of liquids or solids being discharged outside of the Solids Storage and Sludge Separation Areas. (not located in new permit) XY \_\_N

Solid wastes (liquids, sludges, solids, etc.) are only managed within containers, NOT on the ground, on the asphalt or on the concrete areas. (not located in new permit) XY \_\_N

The Solids Storage and Sludge Separation Areas are inspected monthly. (not located in new permit) XY \_\_N

The facility maintains the following waste records:

- The amount of waste received, stored, processed and disposed XY \_\_N  
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] (not located in new permit)
- Monthly Waste Inspection/Corrective Action logs; XY \_\_N  
(not located in new permit)
- Copies of permits for facilities that receive the processed solids. \_\_Y \_\_N  
(not located in new permit)

Monthly compilations are submitted quarterly of the following:

- Material balance (quantities received versus quantities disposed or in storage); XY \_\_N
- Name and location of disposal or treatment facility for all solid wastes removed from the facility. (not located in new permit) \_\_Y \_\_N

Generators supply initial TCLP analysis (or generator knowledge statement) of waste antifreeze. Check facility files for certifications. N/A \_\_Y \_\_N  
(not located in new permit but App.Att 2 states it is all shipped for recycling)

Processing equipment is repaired within one week of becoming inoperable. (not located in new permit) \_\_Y \_\_N

Records are available of annual oil-extracted sludge (OES) sampling and analyses. (not located in new permit) XY \_\_N

**Part IV. Petroleum Contact Water Processing Requirements**

IV.4 PCW tanks and containers are labeled "Petroleum Contact Water" XY \_\_N

IV.6 The following records are maintained at the facility: XY \_\_N



**HOWCO Environmental Services**  
**Compliance Evaluation Inspection Checklist**

- 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;
- Written assurance from the producer that the PCW is nonhazardous. XY \_\_ N

- IV.7 The facility has submitted its annual report covering petroleum contact water (PCW) activities for the previous year by March 1. The report includes: XY \_\_ N
- The total quantity of PCW received during the previous calendar year XY \_\_ N
  - An estimate of the total quantity of product recovered from the PCW XY \_\_ N
- 62-740.300(2) Facility performs and records weekly container or tank inspections. XY \_\_ N

**Part V. Tanks**

- V.1 Secondary containment areas are sealed and free of cracks. XY \_\_ N
- V.1 The areas of secondary containment provide containment for at least 110 % of the volume of the largest tank. XY \_\_ N
- V.4 Used oil tanks and containers are labeled "Used Oil". XY \_\_ N
- V.7 Regulated tank systems are inspected monthly. XY \_\_ N
- V.7 Records are maintained for inspections and monthly release detection monitoring for process and storage tanks. XY \_\_ N
- V.8 Spilled or leaked waste is removed from containment areas within 3 days of the incident. XY \_\_ N
- V.8 Accumulated precipitation is removed within 1 week after a rainfall event using manually controlled pumps. XY \_\_ N
- V.9 Vibratory screen filter solids are containerized and properly sealed. (labeling requirements could not be located in new permit) \_\_Y \_\_ N

**Part VI. Closure**

- VI.2(b) The facility maintains a copy of the Closure Plan. XY \_\_ 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 XY \_\_ N
  - Used Oil Filter Processor XY \_\_ N

**HOWCO Environmental Services**  
**Compliance Evaluation Inspection Checklist**

- 62-710.850(4) The facility has submitted its annual report by March 1. XY \_\_ 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. XY \_\_ N
- 62-710.850(6) All used oil filters are stored in – XY \_\_ N
- Aboveground containers on impermeable surfaces; XY \_\_ N
  - Sealed containers that are in good condition; XY \_\_ N
  - Containers labeled, Used Oil Filters”. XY \_\_ N
- 40 CFR 279.22(d) Upon detection of any leaking or spilled oil the oil is contained, cleaned-up and managed properly. XY \_\_ N

## DOCUMENTS AND RECORDKEEPING

<input checked="" type="checkbox"/> Permit Application. ✓	<input checked="" type="checkbox"/> Operating Permit. ✓
<input checked="" type="checkbox"/> Validated Annual Used Oil Registration [Form 62-701.900(13)]. - posted letter on wall (2007)	<input checked="" type="checkbox"/> Annual Used Oil Recovery Report. - 8626038 2-26-07 submitted Set copy
<input checked="" type="checkbox"/> Annual DEP Registration Placard For Storage Tanks. 07/08	<input checked="" type="checkbox"/> Contingency Plan. 1-9-06 revised
<input checked="" type="checkbox"/> Training Logs. ✓	<input checked="" type="checkbox"/> Closure Plan. ✓
<input checked="" type="checkbox"/> Results of Annual Waste Analyses For All Solid Waste Streams <b>Disposed</b> . Sludge	<input checked="" type="checkbox"/> Annual Closure Cost Update \$94,557 - 2-6-07
<input checked="" type="checkbox"/> Results of Annual Waste Analyses For All Solid Waste Streams <b>Received</b> From Generators. ✓	<input checked="" type="checkbox"/> Transporter Liability Insurance [\$100,000 minimum]. Acord 6010 7-2-07 to 7-2-08 Insurer: Waste Insurance
<input checked="" type="checkbox"/> Processed Oil Sampling Logs [Minimum Of One Sample Every Two Weeks].	<input checked="" type="checkbox"/> Monthly Inspection Logs Of The Solids Storage and Sludge Separation Areas. ✓
<input checked="" type="checkbox"/> Tank Inspections and Monthly Release Detection Monitoring. ✓	<input checked="" type="checkbox"/> Annual Analyses Of WWT and OES Sludges. 12-15-06 tank #111
<input checked="" type="checkbox"/> Analysis Of Vibrascreen Filter Solids and Tank Bottom Sludges [Unless Processed In Tanks 110 or 111].	<input checked="" type="checkbox"/> Generator Non-Haz Demonstration For Used Antifreeze. recycling
<input checked="" type="checkbox"/> Documentation Of Annual Closure Cost Estimate [Solid Waste Processing].	<input checked="" type="checkbox"/> Records Of Refused Used Oil Shipments none refused
<input checked="" type="checkbox"/> Records Of Quantities Of Waste Received, Stored, Processed and Disposed.	Documentation Of Annual Financial Assurance [Solid Waste Processing] DEP Approved 5/9/05 Next Submittal by 3/1/06 ✓
<input checked="" type="checkbox"/> Records Of Disposal Or Treatment Facility For All Solid Wastes Removed [Name and Location].	<input checked="" type="checkbox"/> Quarterly Submittals Of Material Balance Of Quantities Of Solid Waste. last one submitted 6/07 - no longer reqd.
<input checked="" type="checkbox"/> Copies Of Permits For Facilities Receiving Processed Wastes.	<input checked="" type="checkbox"/> Monthly Solid Waste Inspection / Corrective Actions Logs. ✓
<input checked="" type="checkbox"/> Monthly Inspection Logs Of Safety and Emergency Equipment. ✓	<input checked="" type="checkbox"/> Manifests / Bill-Of-Lading. CHECK to see if CESQG status

2-21-07 submitted PCW - 72845-G rev'd  
3,600-G product recovered.

### USED OIL MARKETER CHECKLIST

Facility Name: HOWCO ENVIRONMENTAL SERVICES Date: 09-19-07  
Facility Representative: RICHARD DILLEN, LEE MORRIS Facility ID #: FLD 152 764 767  
Inspector: KELLY HONEY; JIM DREGNE 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 X  
Or does the facility first claim that used oil that is to be burned for energy recovery meets the used oil fuel specification Y X N \_\_\_\_\_
2. Check other Subparts the marketer complies with. (Must comply with at least one and have EPA ID #)  
X C - Generator X E - Transporter X F - Processor \_\_\_\_\_ G - Burner
3. Is the facility registered? (62-710.500(1)(c))) \_\_\_\_\_ N/A (Utility) Y X N \_\_\_\_\_
4. Does the marketer only send off specification oil to burners with EPA ID Numbers (279.71(a)) N/A X 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 X 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 X  
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 X N \_\_\_\_\_  
Cross reference to analysis or other information used to determine that the oil meets the specification? Y X N \_\_\_\_\_  
Quantity of oil shipped? Y X N \_\_\_\_\_  
Date of shipment? Y X N \_\_\_\_\_
9. Does the marketer keep copies of records for three years? (279.72(b)) Y X N \_\_\_\_\_
10. Does the facility maintain records on DEP Form 62-710.900(2), including type of oil and destination or end use? Y X N \_\_\_\_\_
11. Does the facility submit annual reports by March 1? Y X N \_\_\_\_\_

## USED OIL TRANSPORTER CHECKLIST

Facility Name: HOWCO ENVIRONMENTAL SVCS Date: 09-19-07  
Facility Representative: RICHARD DILLEN, LEE MORRIS Facility ID # FLD 152 764 767  
Inspector: JIM DREGNE; KELLY HONEY

### 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, including mobile lube operators, transporting < 55 g /time to a collection center or to an aggregation point owned by the generator or mobile lube operator? ☐  
Mobile Lube Operators or generators who transport more than 55 g per time must comply with 40 CFR 279 transporter standards.
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 ☐  
Is the transporter registered for filter transport? Y ☒ N ☐
9. Are containers/tanks labeled "used oil"? [710.410(6) for non-transfer facilities] Y ☒ N ☐



Facility: HOWCA  
Date: 09-19-01

### Transporter Recordkeeping -- 279.46

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

Name & Address of facility providing the oil for transport? Y X N       
EPA ID # of oil provider (if the generator has one -[62-710.510(1)(b)] Y X N       
Quantity of oil shipped? *not always* Y X N       
Date of shipment? Y X N       
A record of the analysis or specific process knowledge used to ensure the oil is not hazardous waste? (Sniff test or Dexil results should be recorded.) Y X N       
Signature of oil provider, dated upon receipt? Y X N     

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

Name & Address of receiving facility or transporter? Y X N       
EPA ID # of receiving facility or transporter? Y X N       
Quantity of oil delivered? Y X N       
Date of delivery? Y X N       
Signature of oil receiver, dated upon receipt? Y X 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 X N     

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

Y X 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 X 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 X 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 X N     

### Transporter Registration & Certification -- 62-710 F.A.C.

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

Y X N     

2. Does the facility maintain training records & annual updates? [62-710.600(2)(c+d)]

Y X N     

3. Does the facility maintain insurance or financial assurance of \$1,000,000 combined single limit that does not exclude pollution liability? [62-710.600(2)(e)]

Y X N     

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

Y X N

Facility: Howce  
Date: 09-19-07

### 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 X N       
Is this done by testing? Y X N       
Is this done by process knowledge? Describe basis in narrative. Y      N X  
Are test records or copies of records providing basis for determination kept for 3 years? [279.44(d)] Y X N
2. Have any analyses showed exceedances of the 1,000 ppm level? Y X N       
If so, was the oil managed as hazardous waste? Y      N X  
If not, was the oil exempt? Describe in narrative. - rebutted N/A      Y X N
3. Does the facility have a written QA plan and train personnel on their oil screening, field testing and recordkeeping procedures? [62-710.160] Y X 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 X Y X N       
Is the transfer facility registered per 62-710.500(1)(a) F. A. C.? Y X 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
4. Are containers, and tank trailers in good condition and not leaking? [279.45(c)] Y      N
5. Are containers closed if not stored under cover? [62-710.401(6)] Y      N       
and provided with secondary containment consisting of walls and floor at a minimum capable of containing 110% of the largest capacity unit? 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?" [279.45(g)] Y      N
7. Does the facility stop operations and clean up releases of used oil, repairing or replacing any leaking units as applicable? [279.45(h)] Y      N
8. 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
9. Does the facility have more than 25,000 gallons storage capacity and market oil, market oil received from other transporters or process oil to produce fuel? Y      N       
If so, the facility must comply with 62-710 used oil processor permitting requirements.

## Honey, Kelly

---

**From:** Dregne, James  
**Sent:** Tuesday, February 05, 2008 2:09 PM  
**To:** Honey, Kelly  
**Subject:** FW: Howco Environmental Services, St. Petersburg and Astor Facilities Closure Cost Estimates For 2008.

fyi

---

**From:** Kothur, Bheem  
**Sent:** Tuesday, February 05, 2008 11:49 AM  
**To:** 'Richard Dillen'; Tim Hagan  
**Cc:** Prusty, Rabin; Hornbrook, Frank; Fetrow, Chad; Wick, Fred; White, John; Dregne, James  
**Subject:** Howco Environmental Services, St. Petersburg and Astor Facilities Closure Cost Estimates For 2008.

Hello Richard:

We have received your Used oil Processing Facilities Closure Cost Estimates Forms for both the facilities, reviewed and approved the revised estimates, so that you can update the Financial Assurance as needed for the year 2008 and are as follows:

1. Howco, Astor ( North Florida Oil)-----\$23,174.00
2. Howco, St. Petersburg-----\$97,394.00

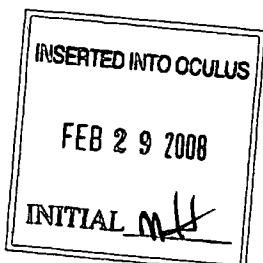
Please contact with DEP, Frank Hornbrook for Astor facility and for St. Petersburg facility Chad Fetrow at 850-245-8745 and 850-245-8740 respectively to update the FA by on or before May 1 2008.

If you all have any questions, please E-mail or call me at 850-245-8781.

That's all

Bheem

Bheem Kothur, P.E., DEE  
Hazardous Waste Regulations Section  
Florida Department of Environmental Protection  
MS# 4560, 2600 Blair Stone Road  
Tallahassee, Florida 32399-2400  
850-245-8781, Suncom: 205-8781, FAX: 850-245-8810  
Email: [Bheem.Kothur@dep.state.fl.us](mailto:Bheem.Kothur@dep.state.fl.us)



RCVD  
01-14-08  
VBA



October 17, 2007

To All Howco Drivers,

It has come to my attention that we continue to find manifests that do not have the halogen leak detection checked off. If there is one line item on the manifest that you cannot miss at anytime, this would be the one. We are required by Federal, State, and Local agencies to comply with halogen screening: (please read below)

**"FDEP RULE - 62-710.600 Certification Program for Used Oil Transporters.**

(2) To become certified and to maintain certification, used oil transporters shall:

(b) Show evidence of familiarity with applicable state laws and rules governing used oil transportation by submitting a training program for approval to the Department which includes provisions for at least the following:

3. A detailed description of the company's standard operating procedure for halogen screening at each pick up location. This description shall include instrument specifications and capabilities, calibration methods and frequency, procedures addressing the handling of loads which indicate halogen levels in excess of 1,000 ppm, and record keeping procedures for all loads accepted or refused."

Due to the critical nature of this and the liability it imposes on our ability to remain as a certified used oil transporter, the following changes will take affect immediately.

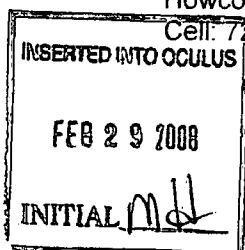
**PMS** – there will be a "zero tolerance" rule for drivers not marking this box when required. If a manifest is discovered without this box checked, the driver will automatically forfeit section 3 of the PMS.

**Corrective Action** – As stated in the Drivers Manual (2005) Part 3 – Handling Cargo, C. Testing Procedures. Every driver is required to test and document for halogens per the procedure. A driver who displays an on-going problem with following this procedure, specifically determined by deviation occurrences, will be subject to disciplinary action.

Please be sure to check your paperwork completely before submitting it. Nobody has control of your ability to complete your paperwork as required, except yourself!

Thank you in advance for your cooperation and attention to this matter.

Lee A. Morris  
Director – Operations/Transportation  
Howco Environmental Services  
Cell: 727-543-5429





# Florida Department of Environmental Protection

Southwest District Office  
13051 North Telecom Parkway  
Temple Terrace, Florida 33637-0926

Charlie Crist  
Governor

Jeff Kottkamp  
Lt. Governor

Michael W. Sole  
Secretary

**CERTIFIED MAIL  
RETURN RECEIPT REQUESTED**

October 11, 2007

7007 0710 0005 3635 7861

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

RE: Consent Order, OGC Case No. 07-1639  
HOWCO Environmental Services  
EPA ID# FLD 152 764 767  
Pinellas County

Dear Mr. Hagan:

Enclosed is a copy of the executed Consent Order for the referenced case.

In order to close this case, you have agreed to pay in settlement the amount of \$27,248.00, along with \$750.00 to reimburse the Department costs, for a total of \$27,998.00. The payment shall be made in 8 quarterly installment payments. The first payment of \$3,498.00 is due on November 1, 2007. The initial payment shall be followed by seven equal quarterly payments of \$3,500.00. Payments are due on the 1<sup>st</sup> day of each new quarter. Final payment is due no later than August 1, 2009.

Your continued cooperation is appreciated. If you have any question please call me at (813) 632-7600, extension 410.

Sincerely,

James M. Dregne  
Environmental Manager  
Division of Waste Management

JMD/jd

Enclosure

cc: Lea Crandall OGC  
Mike Redig, HWR Section  
Jeff Pallas, US EPA Region IV  
Compliance File





# Florida Department of Environmental Protection

Southwest District Office  
13051 North Telecom Parkway  
Temple Terrace, Florida 33637-0926

Charlie Crist  
Governor

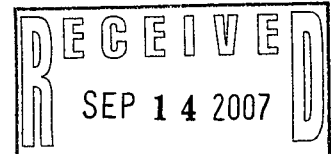
Jeff Kottkamp  
Lt. Governor

Michael W. Sole  
Secretary

**CERTIFIED MAIL** 7007 0710 0005 3635 5348  
**RETURN RECEIPT REQUESTED**

September 13, 2007

Mr. Tim Hagan  
Hagan Holding Company (dba HOWCO Environmental Services)  
3701 Central Avenue  
St. Petersburg, Florida 33713



Dept. of Environmental  
Protection

Re: Proposed Settlement of HOWCO Environmental Services  
EPA ID Number FLD 152 764 767  
OGC File No.: 07-1639

OCT 05 2007

Dear Mr. Hagan

Southwest District

The purpose of this letter is to complete the resolution of the matter previously identified by the Department in the Warning Letter dated July 21, 2006, 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 \$27,248.00, along with \$750.00 to reimburse Department costs, for a total of \$27,998.00. The civil penalty in this case includes four (4) violation of \$2,000.00 or more.

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, 13051 North Telecom Parkway, Temple Terrace, FL, 33637-0926. The payment shall be made in eight quarterly installment payments. The first quarterly payment of \$3,498.00 shall be made within 21 days of your signing this letter. The initial payment will be followed by seven equal quarterly payments of \$3,500.00. The final payment is due no later than August 1, 2009. 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 (including its attachments) 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.

If you do not sign and return this letter to the Department at the District address by October 5, 2007, 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,

Richard W. Cantrell

Richard W. Cantrell  
Interim Director  
Southwest District

**FOR THE RESPONDENT:**

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

By: Tim Hagan Pres  
Date: 10-4-7

.....  
**FOR DEPARTMENT USE ONLY**

DONE AND ENTERED this 9<sup>th</sup> day of October, 2007.

STATE OF FLORIDA DEPARTMENT  
OF ENVIRONMENTAL PROTECTION

Richard W. Cantrell

Richard W. Cantrell  
Interim Director  
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.

Marcia Hain 10/9/07  
Clerk Date

Copies furnished to: Lea Crandell, Agency Clerk, Mail Station 35

## 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  
13051 North Telecom Parkway  
Temple Terrace, FL 33637-0926  
Telephone: 813-632-7600

Colleen M. Castille  
Secretary

July 21, 2006

CERTIFIED MAIL 7004 0750 0003 0516 4905  
RETURN RECEIPT REQUESTED

Mr. Tim Hagan, President  
Hagan Holding Company (dba HOWCO Environmental Services)  
3701 Central Avenue  
St. Petersburg, Florida 33713

Re: HOWCO Environmental Services  
FLD 152 764 767  
Warning Letter #293141  
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. Hazardous waste program field inspections conducted on November 7, 2005, January 5, 2006 and June 1, 2006, indicate 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.

Sections 403.161 and 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 Al Gephart at (813)632-7600, extension 372, 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.

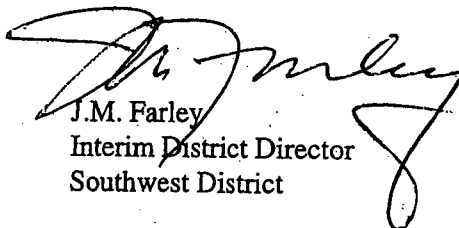
"More Protection, Less Process"

Printed on recycled paper.

Please be advised that this Warning Letter is part of an agency investigation, preliminary to agency action in accordance with Section 120.57(5), 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, the penalties which can be assessed in hazardous waste cases are up to \$27,500 per day per violation

If this investigation confirms that your facility is significantly out of compliance, and the case is not resolved through timely entry of a Consent Order, under the Department's agreement with the EPA, a formal referral for judicial action must be made to the Department's Office of General Counsel. We look forward to your cooperation in completing the investigation and resolution of this matter.

Sincerely yours,



J.M. Farley  
Interim District Director  
Southwest District

JMF/afg

Attachment

cc: Charles Ryburn, Pinellas County DEM  
Jeff Pallas, US EPA Region IV  
Mike Redig, HWR Section  
Compliance File

### REVISED PENALTY COMPUTATION WORKSHEET

Violator's Name: HOWCO Environmental Services FLD 152 764 767

Identify Violator's Facility: 843 43<sup>rd</sup> Street South; St. Petersburg, FL 33711

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

ComHaz Case #: 293141

Date: February 1, 2007

	Violation Type	Manual Guide	Citation	Penalty	Multi Day	Other Adjustments	Total
1.	Failure to maintain emergency equipment.	25.7 Maj/Mod	40 CFR 279.52(a)(3)	\$7,999-\$6,000	---	---	\$6,999
2.	Failure to amend the facility Contingency Plan.	ELRA	40 CFR 279.52(b)(4)(v)		---	---	Combined With #1 Above
3.	Failure to adequately train personnel.	ELRA	40 CFR 279.54 40 CFR 112.7(f)	\$500	---	---	\$500
4.	Failure to seal or otherwise protect from the weather containers of used oil.	ELRA	62-710.401(6)	\$500	---	---	\$500
5.	Failure to properly label containers of used oil.	ELRA	62-710.401(6)	\$500	---	\$125	\$625
6.	Failure to provide adequate secondary containment for containers of used oil.	ELRA	62-710.401(6)	\$500	---	---	\$500
7.	Failure to store used oil filters in sealed containers.	ELRA	62-710.850(5)(a)	\$500	---	\$500	<del>\$1,000</del> ---
8.	Failure to properly label containers of used oil filters.	ELRA	62-710.850(5)(a)	\$500	---	\$500	\$1,000
9.	Failure to provide an impervious surface for storage of used oil filters.	ELRA	62-710.850(5)(a)	---	---	---	Combined With #15 Below
10.	Failure to follow the required sampling protocol for processed oil.	29.1 Maj/Mod Maj/Min	Permit Cond. II.8(a)	\$7,999-\$6,000	---	---	<del>\$6,999</del> \$4,999
11.	Failure to perform required analyses of processed oil.	29.1	Permit Cond. II.8(c)(2)	---	---	---	Combined with #10 above
12.	Accepting unpermitted materials for processing or storage.	ELRA SW-2	Permit Cond. IV.1(b)	\$3,000	---	---	\$3,000



# REVISED PENALTY COMPUTATION WORKSHEET (CONTINUED)

Violator's Name: HOWCO Environmental Services FLD 152 764 767

Identify Violator's Facility: 843 43<sup>rd</sup> Street South; St. Petersburg, FL 33711

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

ComHaz Case #: 293141

Date: February 1, 2007

Violation Type	Manual Guide	Citation	Penalty	Multi Day	Other Adjustments	Total
13. <del>Failure to repair or replace processing equipment within one week of discovery.</del>	<del>ELRA Gen 7</del>	<del>Permit Cond. IV.3(b)</del>	<del>\$1,000</del>	---	---	<del>\$1,000</del> \$0
14. <del>Failure to sample, analyze and characterize materials to meet disposal facility criteria.</del>	<del>ELRA Gen 4</del>	<del>Permit Cond. IV.5(c)</del>	<del>\$2,000</del>	---	---	<del>\$2,000</del> \$0
15. Failure to provide an impervious surface for storing or processing oily waste solids.	ELRA SW-2	Permit Cond. IV.6(b)	\$10,000- \$8,000	---	<del>\$2,500</del>	<del>\$12,500</del> \$8,000
16. Failure to store processed solids in a covered, lined roll-off container.	ELRA	Permit Cond. IV.6(b)		---	---	Combined With #15 Above
17. Failure to properly label containers of processed solids.	ELRA	Permit Cond. IV.7(d)	\$500	---	\$125	\$625
18. Failure to maintain required records of waste streams.	ELRA	Permit Cond. IV.9	\$500	---	---	\$500
Departmental Costs:						\$750
TOTAL PENALTY:						<del>\$36,498</del> \$33,498

# 27,998

James M. Dregne  
JMD  
2/14/07

**REVISED PENALTY COMPUTATION WORKSHEET (CONTINUED)**

Violator's Name: HOWCO Environmental Services FLD 152 764 767

Identify Violator's Facility: 843 43<sup>rd</sup> Street South; St. Petersburg, FL 33711

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

ComHaz Case #: 293141

Date: February 1, 2007

=====

**NOTES:**

For citation (5) above [62-710.401(6), FAC, failure to properly label containers of used oil] an additional \$125 was assessed because there was one previous violation [403.121(7)(a), F.S.].

For citation (7) above [62-710.850(5)(a), FAC, failure to seal or otherwise protect from the weather, containers of U.O.F], an additional \$500 was added because there have been four previous violations [403.121(7)(c), F.S.].

For citation (8) above [62-710.850(5)(a), FAC, failure to properly label containers, "Used Oil Filters"] an additional \$500 was added because there were three previous violations [403.121(7)(c), F.S.].

For citation (15) above [failure to comply with Specific Condition IV.6(b) in the facility's operating permit, failure to store processed solids in a lined, covered roll-off container] an additional \$2,500 was assessed because there was one previous violation [403.121(7)(a), F.S.].

For citation (17) above [failure to comply with Specific Condition IV.7(d), FAC in the facility's operating permit, failure to properly label containers of processed solids] an additional \$125 was assessed because there was one previous violation [403.121(7)(a), F.S.].

  
Deborah A. Getzoff  
District Director  
Southwest District

2/14/07  
Date

## 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 43<sup>rd</sup> Street South; St. Petersburg, FL 33711

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

COUNTY: Pinellas PHONE: (727) 327-8467 DATE: 11/07/05 TIME: 10:05 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 registration
- ☐ 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:

- |  |   |   |   |
|--|---|---|---|
| <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 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 checked="" type="checkbox"/> 62-730, FAC | <input checked="" type="checkbox"/> 62-740, FAC |

3. RESPONSIBLE OFFICIAL:

Tim Hagan, President

4. INSPECTION PARTICIPANTS:

Al Gephart - FDEP  
Kelly Honey - FDEP

Danielle Nichols - FDEP  
Richard Dillen - HOWCO

Bret Galbraith - FDEP  
Juan Rullier, HOWCO

5. LATITUDE/LONGITUDE: 27°45'41.6"/ 82°41'32.5"

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

## 9. PROCESS DESCRIPTION:

HOWCO Environmental Services is a used oil and material processing facility that stores, processes and markets used oil and accepts oily waste solids which are processed and solidified prior to disposal at a landfill. The processing of solid wastes is overseen by the Department's Solid Waste Management Program that also participated in this inspection.

Upon inspecting the used oil processing area it was observed that there were three open containers of used oil in the area of tank #170. Failure to label containers of used oil and failure to seal containers of used oil, or otherwise protect them from the weather, are violations of **62-710.401(6), FAC**.

Solid waste managed at the facility includes oily solid waste generated by HOWCO and its clients. The solidified wastes are managed as non-hazardous material. On two inspection dates, November 7, 2005 and on January 5, 2006, the drum storage area on the south side of the property, west and east of the used oil filter crusher, was inspected. On 11/7/05 it was observed that the surface of the secondary containment area was no longer "impervious" as required. HOWCO had been advised in past compliance inspections dated 8/13/01, 7/24/02 and 6/24/03 that this was an area of concern to the Department and that HOWCO was to assess this area by power washing the surface, inspecting the integrity of the concrete floor and seal coat and make repairs, as needed. On this inspection it was observed that there were cracks throughout the entire containment area and the entire area was not impervious to contaminants. This is a violation of **62-710.850(5)(a), FAC**. During a follow-up site visit on June 1, 2006, it was observed that the facility had cleaned and re-sealed the secondary containment area. However, there were areas in which the sealant had been gouged off due to the movement of roll-off boxes in and out of the area. The facility needs to address how they will ensure an impervious surface.

At the time of the 11/7/05 inspection, there were five (5) roll-off boxes being stored in the Solids Storage and Sludge Separation Areas. Two contained solid waste, one contained demolition and yard debris, one contained used oil filters and the fifth was empty. It was observed that one roll-off box of processed material had a puncture in one of its plastic "doors". This is a violation of **Specific Condition IV.6(b)** in the facility's operating permit which requires that all processed solids shall be stored in covered, lined roll-off containers or covered drums on impervious surfaces. Also observed was one covered roll-off box containing processed waste which was labeled "EMPTY". This is a violation of **Specific Condition IV.7(d)** in the facility's operating permit which states that such containers shall be labeled "Processed Solid Waste". During the inspection, facility personnel stated that one of the facility's vacuum trucks had been down for a month and no replacement equipment had been found as yet. This is a violation of **Specific Condition IV.3(b)** in the facility's operating permit which requires in such event, the permittee shall complete repairs or provide reserve equipment within one week of discovery of the equipment failure.

The drum storage area also contained fifty seven (57) drums of oily waste and more than 100 drums of used oil filters. Department staff inspected the shipment from GAF that included 57 drums (manifest #0070133962) most of which were labeled "used oil" that were received on or around October 19, 2005 by the facility. Upon examination of the contents of these drums, it was observed that little of the material was suitable/useable to recover used oil. A subsequent discussion with Mike Wolfe regarding this shipment revealed that the facility was aware that very little of the material could be processed and HOWCO would essentially just be taking the material to the landfill. The waste was not readily identifiable, and a good portion appeared to be trash, contaminated with small amounts of oil. There was also a roll-off of various construction and demolition debris that was not apparently contaminated by oil.

Facility personnel explained to DEP staff that this roll-off came from a "sister" facility's yard and was going to Okeechobee Landfill and that the present facility was only being used as a transfer point. These activities are in violation of **Specific Condition IV.1(b)** (the accepted materials lists) in the facility's operating permit.

Of over 100 drums of used oil filters, there were a large number of drums improperly labeled and one roll-off box of used oil filters that was covered with a tarp made from a mesh material. On 1/5/06 it was observed that there was one drum of used oil filters that had no lid, and there was no lid in the area. On a site visit 6/1/06 four drums of used oil filters were not sealed or protected from the weather. Failure to properly seal containers of used oil filters or otherwise protect them from the weather is a violation of **62-710.850(5)(a), FAC**.

There was a container of used oil that was not sealed and not protected from the weather, and it was observed that there were approximately thirty-three 55-gallon drums that were improperly labeled "water & oil mixed." Failure to properly label and seal containers of used oil or otherwise protect them from the weather are violations of **62-710.401(6), FAC**.

In addition, on both site visits it was disturbing to the inspectors that the Plant Manager and facility personnel could not tell the inspectors what the contents were of many drums and could not explain the labeling on containers. This indicates a deficiency in the facility's training program. The failure to properly train facility personnel managing wastes is a violation of **40 CFR 279.54** [used oil processor/refiners are subject to all applicable Spill Prevention Control and Countermeasures (40 CFR part 112)]. 40 CFR 112.7(f)(1) addresses personnel training. At a minimum, facility personnel are to be trained in the operation and maintenance of equipment to prevent discharges; discharge procedure protocols; applicable pollution control laws, rules, and regulations; general facility operations; and the contents of the facility's SPCC and Contingency Plans.

During the 1/5/06 site visit it was observed that personnel were processing solid waste in a roll-off box in the solid waste processing area. Mulch was being added to oily solid waste for solidification prior to disposal. Mulch is not one of the approved solidification agents. Because HOWCO did not provide written notice of its use to the Department, it is a violation of **Specific Condition IV.1(a)(12)** in the facility's operating permit. The area around the roll-off box had pools of used oil, and the roll-off box was laden with pools of used oil. During a site visit on 2/16/06 it was again observed that there was a roll-off box in the solids processing area that had a pool of oil on top of the tarp. Under the tarp, the contents were laden with a pool of used oil. These are violations of **Specific Condition IV.10** in the facility's operating permit. In processing oily waste, the correct procedure is for HOWCO to recover any used oil in either the cone bottom tank (#110) or the inclined tank (#111) prior to processing the waste. It appeared that this was not being done. Failure to perform a hazardous waste determination prior to land disposal of this material is a violation of **40 CFR 262.11** [per **40 CFR 279.10(e)(3)(i)**]. Also, the roll-off box was not properly labeled, "Processed Solids". On a site-visit 6/1/06 it was again observed that a roll-off box was not properly labeled, "Processed Solids." This is a violation of **Specific Condition IV.7(d)** in the facility's operating permit.

There were two 55-gallon drums of used oil behind the laboratory in secondary containment. However, there was oil in the secondary containment, and the secondary containment does not appear to have the capacity to contain at least 110% of the largest container. This is a violation of **62-710.401(6), FAC**. The facility shall ensure that the containment system is emptied to accommodate any future spills or leaks and that there is the appropriate containment capacity.

The fire and emergency equipment are inspected monthly and are tested annually. Fire extinguishers were serviced in August and October 2005, except for the maintenance shop fire extinguisher that was last serviced in November 2004. The facility is to ensure that all fire extinguishers are serviced annually.

DEP staff also observed that not all outgoing material to be disposed was sampled and analyzed on an annual basis. This is a violation of **Specific Condition IV.5(c)** in the facility's operating permit, which requires such sampling and analysis be done on an annual basis or more frequently if required. Records of waste streams at the facility were found to be inadequate. This is a violation of **Specific Condition IV.9** in the facility's operating permit. It was observed that there was not a signed waste profile form for each waste stream received, and that some manifests did not have a date on which the manifest was signed and/or did not have the signatory's name printed on the manifest. On some occasions, it was found that the waste stream was not adequately identified (i.e. "Sludge") with any description of where or from what materials/process the waste was generated.

On January 5, 2006, the facility was re-visited to review operating records. Upon reviewing the sampling protocol for determining whether off-site shipments of oil were "on-spec", it was determined that from January to December 2005 the facility had not been following the random sampling procedure as specified in its operating permit. This is a violation of **Specific Condition II.8(a)** in the facility's operating permit. In addition, the facility did not sample one tank (or batch) every two weeks as required. Of a possible 26 sampling events HOWCO sampled only 24 times in 2005. This is a violation of **Specific Condition II.8(c)(2)** in the facility's operating permit. It was also observed that Batch #2586 was sampled on 12/28/05 and loads were shipped off-site on 12/29/05 which was before the results for the previous batch (Batch #2585 sampled on 12/27/05) were received. The purpose of the sampling program is to determine compliance with the "on-spec" criteria for processed oil. It is not appropriate to ship processed oil prior to the specification analyses being received.

The monthly inspection logs were reviewed and found to be complete. However, it was noted that on the January 2005 inspection log the loud speaker for communications was not functional and corrective action was required. This same notation was noted on the February, March, April and May 2005 inspection logs. On the June 2005 inspection log it was noted that the communications system was okay, but on the July 2005 inspection log it was again noted as not being functional. On the August 2005 inspection log it was noted that the facility started using a megaphone for communications. Failure to provide or maintain emergency equipment such as the communications and alarm systems is a violation of **40 CFR 279.52(a)(3)**. Failure to amend the facility Contingency Plan to denote a change in emergency procedures is a violation of **40 CFR 279.52(b)(4)(v)**. Failure to train personnel of the availability and use of the communication system is a violation of **40 CFR 279.54 [reference to 40 CFR 112.7(f)]**. The one megaphone or bull horn is kept in the Plant Manager's office. The facility shall either get the loud speaker system repaired or find other devices of communication and provide multiple units for facility personnel to use. The facility shall also train facility personnel on the usage of the communication device(s).

HOWCO was delinquent in submitting its Used Oil Processing Permit Renewal Application. The application was due on June 4, 2005, sixty (60) days prior to the expiration date of the existing permit. This is a violation of **62-710.800(4)**, FAC. The District received a copy of the permit renewal application on July 26, 2005.

HOWCO was also delinquent in submitting its Solid Waste Processing Permit Renewal Application. Rule 62-4.090(1), FAC, requires that sixty days prior to permit expiration the permittee shall apply for a renewal of the permit. The permit renewal application was submitted (Aug. 29, 2005) and was not made



complete prior to the expiration of the permit. The application was not timely, and the permit expired, yet the facility has continued to operate without authorization (a permit). This is in violation of Rules 62-701.300(1)(a), FAC, and 62-701.320(10)(a), FAC, which state that no person shall store, process, or dispose of solid waste except at a permitted solid waste facility or a facility exempt from permitting under certain circumstances, and if a renewal application is submitted prior to sixty days before expiration of the existing permit, it will be considered timely and sufficient. If the renewal application is submitted at a later date, it will not be considered timely and sufficient, unless is it submitted and made complete prior to the expiration of the existing permit. During the November 7, 2005, compliance inspection, facility personnel were advised that they were operating without a solid waste permit. This is a violation of 62-701.320(1), FAC.

**10. SUMMARY OF ALLEGED VIOLATIONS:**

~~40 CFR 262.11~~

~~Failure to make a hazardous waste determination prior to treating used oil processing residuals, or un-processable residuals.~~

40 CFR 279.52(a)(3)

Failure to maintain a functioning communications or alarm system.

40 CFR 279.52(b)(4)(v)

Failure to amend the facility's Contingency Plan (after a change in emergency communications procedure.)

40 CFR 279.54

Failure to adequately train personnel.

~~62-701.300(1)(a), FAC and  
62-701.320(10)(a), FAC~~

~~Failure to submit a solid waste facility processing facility permit renewal application in a timely manner.~~

~~62-701.320(1), FAC~~

~~Operating a solid waste management facility without a permit issued by the Department.~~

62-710.401(6), FAC

Failure to seal or otherwise protect from the weather containers of used oil.  
(Repeat Violation).

Failure to properly label containers of used oil.  
(Repeat Violation).

Failure to provide adequate secondary containment capacity for containers of used oil.

~~62-710.800(4), FAC~~

~~Failure to submit a used oil processor facility renewal permit application to the Department at least 60 days prior to the expiration date of the existing permit.~~

62-710.850(5)(a), FAC

Failure to seal, or otherwise protect from the weather, containers of used oil filters. (Repeat Violation).

	Failure to properly label containers, "Used Oil Filters." (Repeat Violation).
	Failure to provide an impervious surface for the storage of containers of used oil filters. (Corrected)
Specific Condition II.8(a)	Failure to follow sampling protocol for processed oil. (Corrected)
Specific Condition II.8(c)(2)	Failure to sample and analyze processed oil at the required frequency.
<del>Specific Condition IV.1(a)(12)</del>	<del>Failure to use an authorized solidification agent for processing solids.</del>
Specific Condition IV.1(b)	Failure to perform acceptance screening on materials prior to processing or storage.
Specific Condition IV.3(b)	Failure to repair or replace inoperable processing equipment within one week of discovery.
Specific Condition IV.5(c)	Failure to, at least annually, sample, analyze and characterize materials to meet intended disposal facilities' acceptance criteria.
Specific Condition IV.6(b)	Failure to provide an impervious surface for storing or processing oily waste solids. (Corrected)
	Failure to store solids in a covered, lined roll-off container.
Specific Condition IV.7(d)	Failure to properly label containers of processed solids with the words, "Processed Solids."
Specific Condition IV.9	Failure to maintain required records of waste streams (signed waste profile of material received, dated signed manifests and proper description of waste.)
<del>Specific Condition IV.10</del>	<del>Failure to contain, clean up and properly manage released oil and oily waste.</del>

#### 11. RECOMMENDED CORRECTIVE ACTIONS:

~~40 CFR 262.11~~

~~Effective immediately and henceforth, the facility shall  
ensure that solid wastes are characterized prior to  
landfilling for disposal.~~

40 CFR 279.52(a)(3)

Effective immediately and henceforth, the facility shall ensure that communications or alarm systems are functional.

40 CFR 279.52(b)(4)(v)

Effective immediately and henceforth, the facility shall amend the facility's Contingency Plan to reflect changes in the facility's operations and procedures.

40 CFR 279.54

Effective immediately and henceforth, the facility shall ensure personnel are adequately trained.

~~62-701.300(1)(a), FAC and  
62-701.320(10)(c), FAC~~

~~Effective immediately and henceforth, the facility shall ensure that it makes timely submittals regarding all of its operating permit requirements.~~

~~62-701.320(1), FAC~~

~~Effective immediately the facility shall cease its solid waste management activities until issued a permit by the Department.~~

62-710.401(6), FAC

Effective immediately and henceforth, the facility shall ensure that used oil containers are sealed or protected from the weather, are properly labeled and there is adequate capacity in the secondary containment to contain 110% of the largest container within containment.

~~62-710.800(4), FAC~~

~~Effective immediately and henceforth, the facility shall ensure that it makes timely submittals regarding all of its operating permit requirements.~~

62-710.850(5)(a), FAC

Effective immediately and henceforth, the facility shall ensure that used oil filters are stored in containers that are sealed or otherwise protected from the weather, properly labeled and stored on an impervious surface.

Specific Condition II.8(c)(2)

Effective immediately and henceforth, the facility shall ensure that it performs the required analyses of processed oil as specified in the facility's operating permit.

~~Specific Condition IV.1(a)(12)~~

~~Effective immediately and henceforth, the facility shall ensure that it uses an approved solidification agent for processing oily waste or requests and receives prior Department approval for use of an alternate agent.~~

Specific Condition IV.1(b)

Effective immediately and henceforth, the facility shall limit the acceptance of solid waste to those materials specified and defined in the facility's operating permit.

Specific Condition IV.3(b)

Effective immediately and henceforth, the facility shall repair or replace operating equipment within one week after discovery.

Specific Condition IV.5(c)

Effective immediately and henceforth, the facility shall ensure, at least annually, to sample, analyze and characterize materials to meet intended disposal facilities' acceptance criteria.

Specific Condition IV.6(b)

Effective immediately and henceforth, the facility shall ensure that processed solids are stored in a lined and covered roll-off container.

Specific Condition IV.7(d)

Effective immediately and henceforth, the facility shall ensure that containers of processed solids are properly labeled, "Processed Solids."

Specific Condition IV.9

Effective immediately and henceforth, the facility shall maintain complete and accurate records of waste profiles, manifests and proper descriptions of materials received.

~~Specific Condition IV.10~~

~~Effective immediately and henceforth, the facility shall ensure that personnel contain, clean up and properly manage released oil and oily waste.~~

Report Prepared By: \_\_\_\_\_  
Al Gephart Engineering Specialist IV

Report Reviewed By: \_\_\_\_\_  
Danielle Nichols Environmental Specialist I

Report Reviewed By: \_\_\_\_\_  
Kelly Honey Environmental Specialist II

Report Approved By: \_\_\_\_\_  
Elizabeth Knauss Environmental Manager

Date \_\_\_\_\_



Department of Environmental Protection  
FDEP, MS 4555, 2600 Blair Stone Road Tallahassee, Florida 32399-2400

REV 09-19-07 (02)  
DEP Form #62-710.901(3)  
Form Title Annual Report by Used Oil  
and Used Oil Filter Handlers  
Effective Date June 9, 2005

## Annual Report by Used Oil and Used Oil Filter Handlers\*

(\*Handlers are any persons subject to the registration requirements of rule 62-710.500 and 62-710.850, F.A.C. [See Section A, Box 5 below])  
for reporting period January 1, 2006 through December 31, 2006

Use the information recorded in your Record Keeping Form [62-710.901(2)] or equivalent to complete this document

### SECTION A TO BE COMPLETED BY ALL REGISTERED PERSONS

1. Company Name: HOWCO ENV. SERVICES 2. Telephone No. (727) 327-8467  
Site Address: 843 Y3RD STREET SOUTH  
ST. PETERSBURG, FL 33711 3. EPA ID No. FLD 152 764 767  
☐ Check box if any of the above items (1-3) have changed since your last registration  
4. Name of person preparing report (please print) RICHARD DILLEN  
Title QUALITY ASSURANCE OFFICER Phone number (if different from #2, above) (727) 328-7403  
5. Type of operation (check as many as apply to your operations)  
Used Oil: ☒ Transporter ☒ Transfer Facility ☒ Collection Center/Aggregation Point ☒ Processor ☐ Marketer  
☐ Burner (of off-specification used oil)  
Used Oil Filter: ☒ Transporter ☒ Transfer Facility ☒ Processor ☐ End User

### SECTION B USED OIL (TO BE COMPLETED BY ALL REGISTERED USED OIL HANDLERS. USED OIL FILTER HANDLERS SEE SECTION C)

1. Amount (in gallons) of Used Oil and Oily Wastes collected

- a. In Florida.....  
b. From out of state.....

Automotive	Industrial	Mixed	Total
—	—	8,626,038	8,626,038
—	—	64,678	64,678
c. Beginning Inventory.....			555,300
d. Total (sum of totals from Lines a + b + c).....			9,246,02.

2. Amount (in gallons) of Used Oil and Oily Wastes Managed

- N - Not an end use, transferred to another facility for storage or processing.....  
O - Marketed as an on-specification used oil fuel.....  
F - Marketed as an off-specification used oil fuel.....  
I - Marketed for an industrial process.....  
B - Burned as an off-specification used oil fuel .....
- D - Disposed of  
Landfilled.....  
Treated at a wastewater treatment unit.....  
Incinerated.....

In State	Out of State
0	—
6,199,407	—
0	—
2,35,073	—
0	—
54,209	—
2,122,292	—
28,936	—
8,639,917	—
606,105	—

3. Total amount (in gallons) of used oil managed.....

4. End of year, on hand estimate (Difference between Lines 1D and Line 3).....

**SECTION C USED OIL FILTERS (OPTIONAL)** (USE TABLE BELOW FOR CONVERSIONS)

CHECK COLUMN IF OUT OF STATE ↓

1. Number of filters on hand from previous year.....	93,725	
2. Number of used oil filters collected.....	4,268,550	
3. Total number of used oil filters on hand at beginning of year.....	4,362,275	
4. Disposition of used oil filters collected:		
a. Transferred to another registered facility.....	0	
b. Burned for energy recovery at a Waste-To-Energy facility.....	0	
c. Transferred directly to a metal foundry for recycling.....	4,304,275	
d. TOTAL.....	4,304,275	
5. End of year, on hand estimate (Difference between Lines 3 and Line 4d).....	58,000	
6. Gallons of used oil collected as a result of filter processing.....	60,000	
7. Gallons of used oil transferred to a used oil handler (transporter or processor).....	60,000	
8. Volume of oily waste collected and managed as a result of filter processing.....	5,500	
9. Description of oily waste management.....	LANDFILLED AFTER APPROPRIATE TESTING.	

**DIRECTIONS FOR SECTION C**

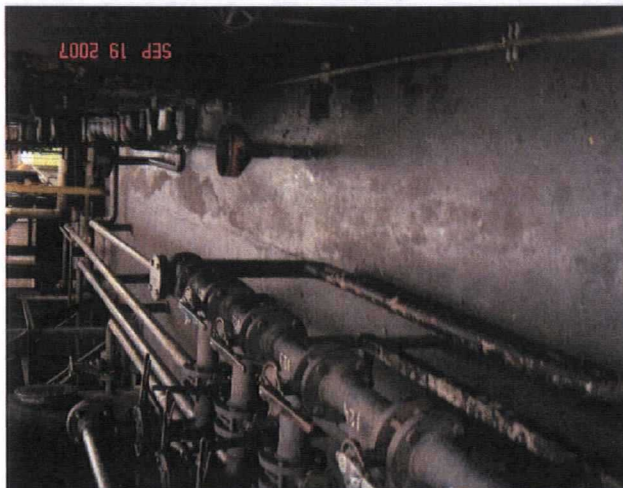
Conversion Table

One 55-gallon drum of <b>crushed</b> used oil filters = approximately <b>400</b> used oil filters
One 55 gallon drum of <b>uncrushed</b> used oil filters = approximately <b>250</b> used oil filters
One <b>ton</b> of drained used oil filters = approximately <b>2,350</b> used oil filters

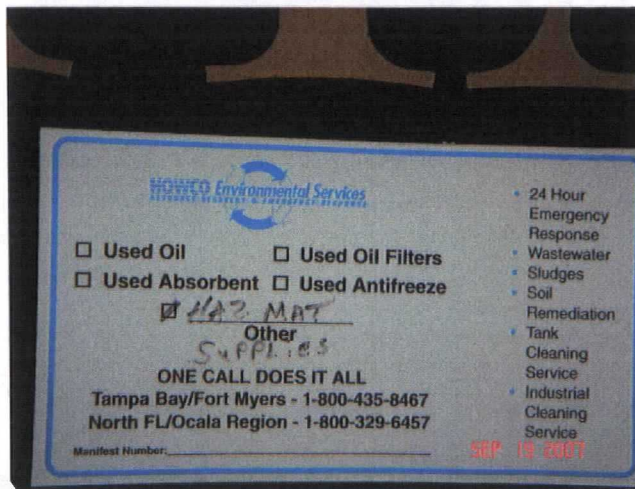
1. Enter the number of Used Oil Filters on hand, from previous year's inventory.
2. Enter the number of Used Oil Filters collected.
3. Enter the sum of Line 1 + Line 2.
4. Enter the number of filters managed by your facility in blocks 4a-c. Enter the sum of 4a-c in block 4d.
5. Enter the number of filters on hand at your site as of December 31, last year.
6. Fill in the number of gallons of used oil collected by your filter operation.
7. Enter the number of gallons transferred to a used oil transporter or processor.
8. List the volume (gallons or cubic yards) of the oily wastes collected through your filter handling. Oily wastes are identified in Chapter 62-710.201(1) of the Florida Administrative Code and include bottom sludges, sorbents, wipes etc.
9. Describe how oily wastes were managed (sent to a WTE, hazardous waste facility, landfilled after appropriate testing, etc.).

Any questions concerning this form may be referred to the Used Oil Coordinator, MS 4555, Department of Environmental Protection 2600 Blair Stone Road, Tallahassee, FL 32399-2400, Phone (850) 245-8754, email: [sebreana.peck@dep.state.fl.us](mailto:sebreana.peck@dep.state.fl.us), OR Phone (850) 245-8755, email: [richard.neves@dep.state.fl.us](mailto:richard.neves@dep.state.fl.us)







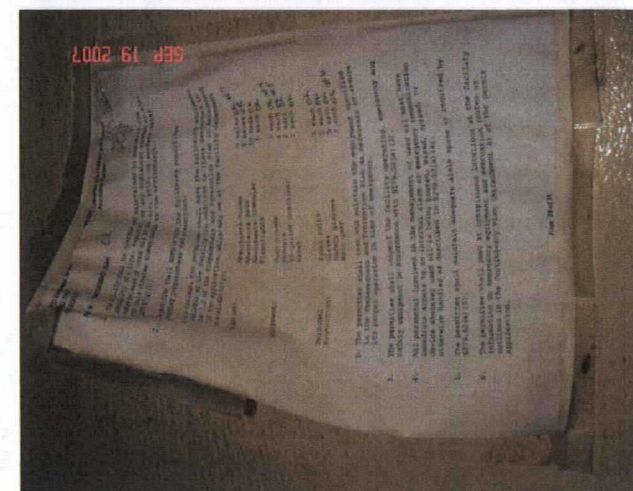
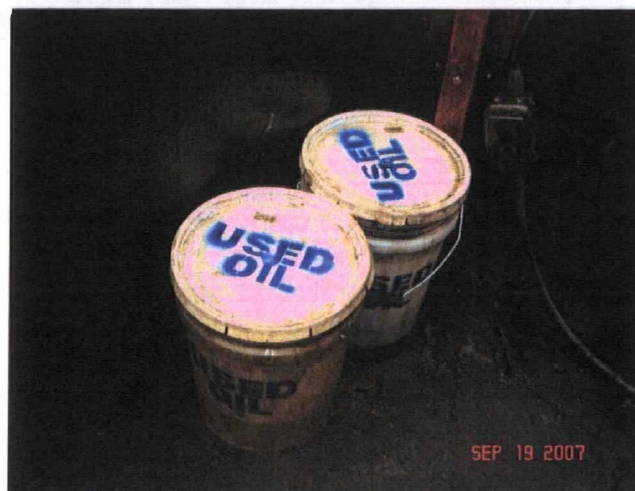
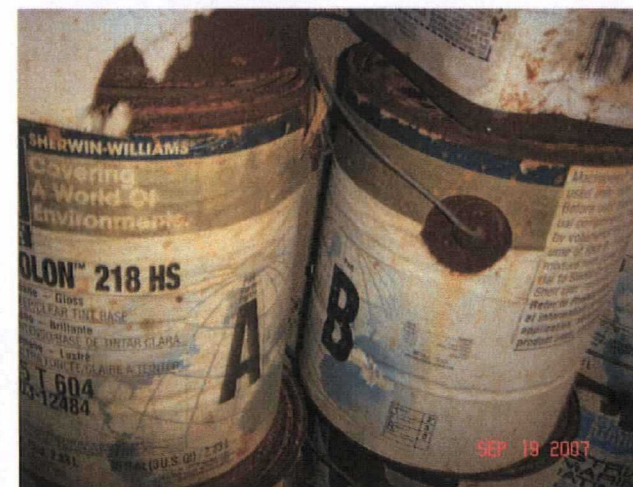
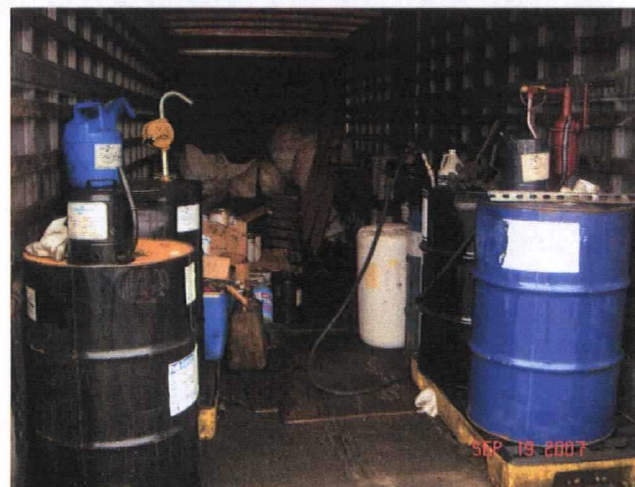


The permittee shall comply with the following conditions concerning preparedness and prevention:

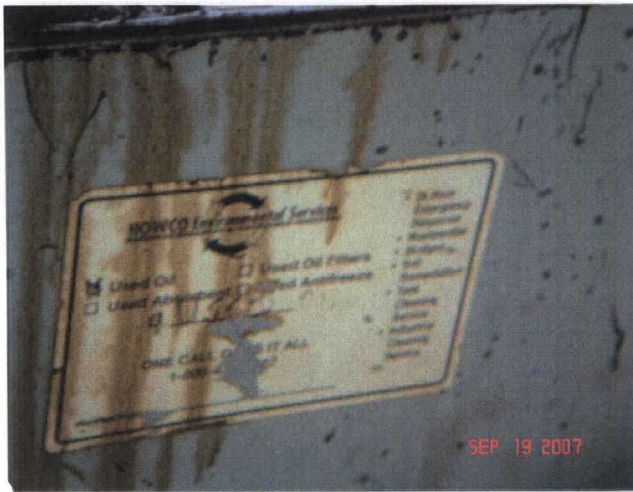
At a minimum, the permittee shall have the following equipment available at the facility (in addition to items described in Item 7.2 of the Preparedness and Prevention Plan in Attachment 7 of the application, which may be at the facility dependent on availability):

Supplies:	Equipment:	Personal Protection:
Absorbents booms	Push Brooms	Tyvek suits
Absorbents pads	Shovels	Gloves
Absorbents granular	55-gallon container	Safety glasses
Flashlights	Rakes	Rain gear

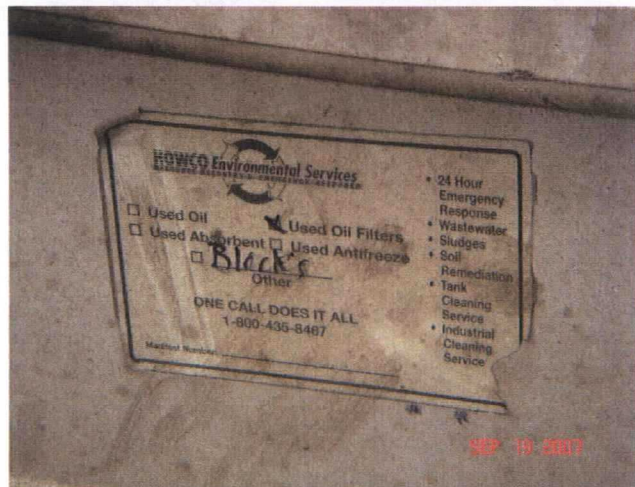
The permittee shall test and maintain the equipment specified in the Preparedness and Prevention Plan.



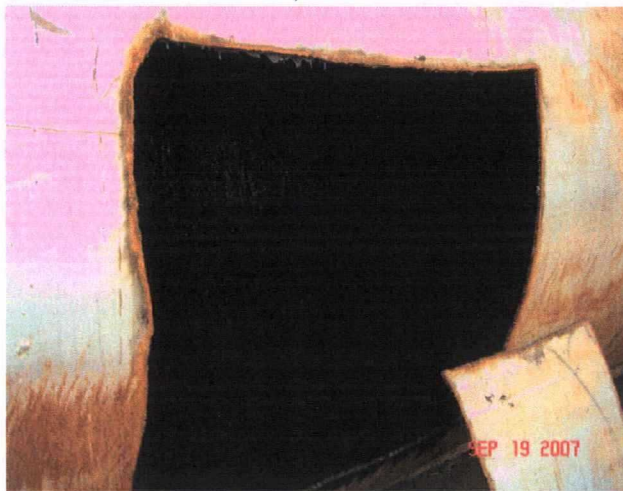




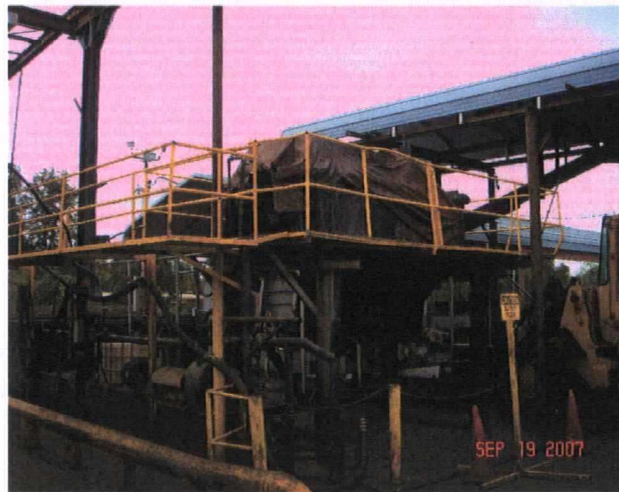
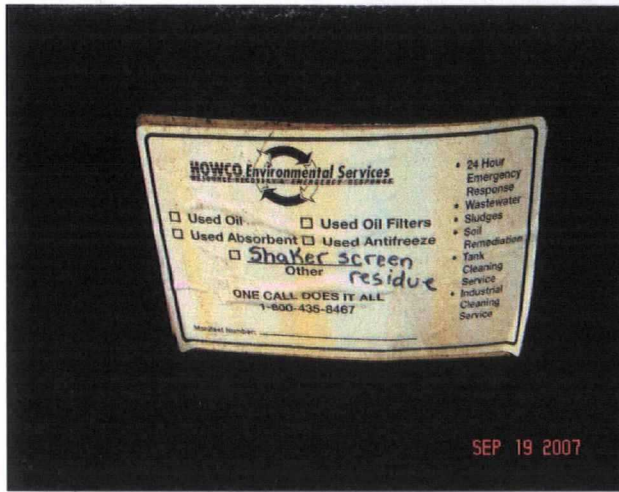
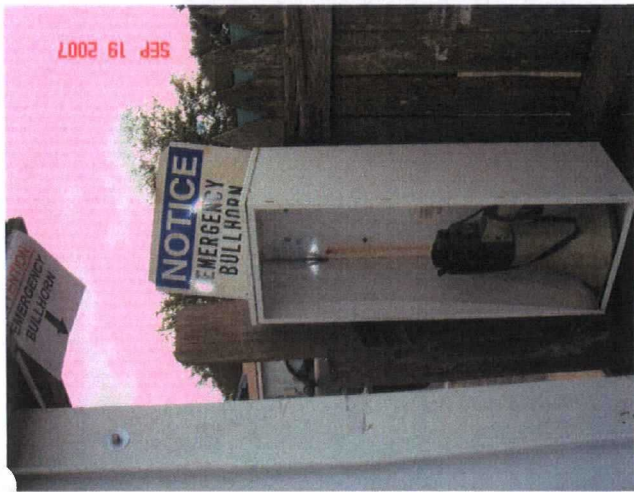








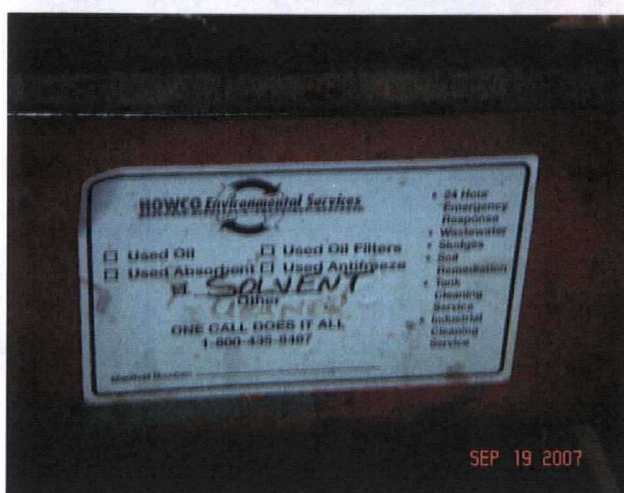








RESPONSE SECTION	MONTHLY INSPECTION - May 2007	INSPECTION DATE: 05/11/07	INSPECTOR: JAMES HEN
	ITEM DESCRIPTION	INSPECTION TIME: 14:30	ACTION TAKEN
		DEFICIENCY	
	RELEASE OF TOXINS MONTHLY INSPECTION		
	WREST LANK FARM		
TS	Externally contained areas clean, dry and not damaged	12	
TS	Drums are labelled, covered, and not leaking	12	
TS	Trucks are checked 'wash' or	12	
CM	How personnel completed the required training	12	
	Storage tanks clean, no damaged panel and valves are not leaking	12	
CM	HA factor facility housekeeping is neat, clean, hoses properly stored, no wet oil spots, plant drums, materials and supplies are properly stored, trash picked up, fence line clear of trash	12	
TS	All bucket handles are locked at the discharge valve in the facility	12	
OP	Operate and inspect safety showstays/winch station	12	
CM	EAST TANK FARM		
	Externally contained areas clean, dry and not damaged	12	
TS	Drums are labelled, covered, and not leaking	12	
TS	Trucks are checked 'wash' or	12	
CM	How personnel completed the required training	12	
	Storage tanks clean, no damaged panel and valves are not leaking	12	
TS	General facility housekeeping is neat, clean, hoses properly stored, no wet oil spots, plant drums, materials and supplies are properly stored, trash picked up, fence line clear of trash	12	
TS	All bucket handles are locked at the discharge valve in the facility	12	
	Operate and inspect safety showstays/winch station	12	
	RECEIVING AREA		
	Externally contained areas clean, dry and not damaged	12	
TS	Drums are labelled, covered, and not leaking	12	
TS	Trucks are checked 'wash' or	12	
CM	How personnel completed the required training	12	
	Storage tanks clean, no damaged panel and valves are not leaking	12	
TS	General facility housekeeping is neat, clean, hoses properly stored, no wet oil spots, plant drums, materials and supplies are properly stored, trash picked up, fence line clear of trash	12	
TS	All bucket handles are locked at the discharge valve in the facility	12	

[illegible]



SECTION I

MANUFACTURER: GRIFFIN PAINT MFG.  
5129 TRENTON ST.  
TAMPA, FLA. 33619

PRODUCT CLASS: UNKNOWN  
TRADE NAME: ORANGE STRIPPING LATEX

SECTION II - HAZARDOUS

Ingredient	Percent
Medium Chrome Yellow	21%
Touidine Red Paste	19%
Calcium Carbonate	7%
Vinyl Acrylic Latex	21%
Glycols	2%
Water	

SEP 19 2007

SECTION III -



MATERIAL SAFETY DATA SHEET G.A.F.

DATE: MARCH 13, 1991

SECTION I

MANUFACTURER: GRIFFIN PAINT MFG.  
5129 TRENTON ST.  
TAMPA, FLA. 33619

PRODUCT CLASS: UNKNOWN  
TRADE NAME: ORANGE STRIPPING LATEX

EMERGENCY TELEPHONE NO. 247-2369

MANUFACTURER'S CODE IDENTIFICATION NONE

SECTION II - HAZARDOUS INGREDIENTS

Ingredient	Percent	PPH	mg/m3	VAPOR PRESSURE
Medium Chrome Yellow	21%	N.A.	N.A.	N.A.
Touidine Red Paste	19%	N.A.	N.A.	N.A.
Calcium Carbonate	7%	N.A.	N.A.	N.A.
Vinyl Acrylic Latex	21%	N.A.	N.A.	N.A.
Glycols	2%	N.A.	N.A.	N.A.
Water	100%	N.A.	N.A.	N.A.

SECTION III - PHYSICAL DATA

SEP 19 2007



CERTIFICATE OF ANALYSIS

TCLP METALS

ANALYSIS	METHOD	RESULTS	REG. LEVEL	DET. LIMIT	ANALYST
Arsenic	1311/6010	BDL	5.0 mg/L	0.1 mg/L	E84925
Barium	1311/6010	2.86 mg/L	100.0 mg/L	0.1 mg/L	E84925
Cadmium	1311/6010	4.28 mg/L	1.0 mg/L	0.1 mg/L	E84925
Chromium	1311/6010	BDL	5.0 mg/L	0.1 mg/L	E84925
Selenium	1311/6010	BDL	1.0 mg/L	0.1 mg/L	E84925
Silver	1311/6010	BDL	5.0 mg/L	0.1 mg/L	E84925
Lead	1311/6010	0.25 mg/L	5.0 mg/L	0.1 mg/L	E84925
Mercury	1311/7474	BDL	0.2 mg/L	0.1 mg/L	E84925

SEP 19 2007



FMCSA ANNUAL VEHICLE INSPECTION LABEL

TO WRITE ON THIS LABEL USE AN INDELEIBLE, PERMANENT INK MARKER, PEN OR PENCIL THAT WILL NOT FADE IN DIRECT SUNLIGHT

COMPANY NAME: **HOWCO**

STREET: **4317 8 AVE SO**

CITY, STATE, ZIP CODE: **ST PETE FL 33711**

TELEPHONE: **727 267-1069** MOVER CARRIER IDENTIFICATION NUMBER: **36**

CERTIFICATION: THIS VEHICLE HAS PASSED AN INSPECTION IN ACCORDANCE WITH 49 CFR 39.17 THROUGH 39.23.

VEHICLE IDENTIFICATION: IF THE VEHICLE IS NOT READILY, CLEARLY, AND PERMANENTLY MARKED, CHECK ONE AND COMPLETE

LEFT UNIT NUMBER: ☐ VEHICLE IDENTIFICATION: ☐ OTHER: ☐

DATE RECEIVED: January 22, 2007 DATE COMPLETED: January 31, 2007

SEP 19 2007

## Nichols, Danielle

---

**From:** Richard Dillen [rdillen@howcousa.com]  
**Sent:** Friday, January 05, 2007 9:31 AM  
**To:** Nichols, Danielle  
**Cc:** Tim Hagan; Mike Wolfe  
**Subject:** FW: Draft Report



67591.pdf

Dear Mrs. Nichols,

Attached is a copy of the preliminary TCLP-results of the two waste streams (WWTS and OES-111) sampled on 12/15/06, during your presence. Pending the TCLP-Pesticides, the results so far show both waste streams to be non-hazardous. Once I receive those results, I will forward them to you.

Sincerely,  
Richard Dillen  
QAO, HOWCO Env. Serv.

-----Original Message-----

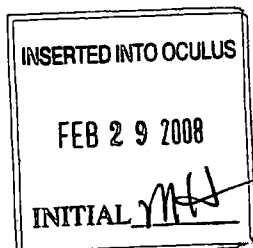
From: Michael Cammarata [mailto:mcammarata@aellab.com]  
Sent: Thursday, January 04, 2007 5:31 PM  
To: Richard Dillen  
Subject: Draft Report

Hi Richard,  
The pesticides still need to be validated, I will get you those tomorrow. Thanks for the work.

-----Original Message-----

From: KCA\_074509@aellab.com [mailto:KCA\_074509@aellab.com]  
Sent: Thursday, January 04, 2007 1:22 PM  
To: mcammarata@aellab.com  
Subject: Attached image data.

This is image data from the scanner.





**Advanced  
Environmental Laboratories, Inc.**

9610 Princess Palm Avenue  
Tampa, Florida 33619  
(813) 630-9616  
FAX (813) 630-4327

**Client:** Howco, Inc.  
**Project Name:** Annual Compliance  
**Project Number:** 31483

**Report No.:** T0614262  
**Date Sampled:** 12/15/2006  
**Date Received:** 12/15/06 10:30  
**Date Reported:** 01/04/2007

**Attention:** Richard Dillen  
**Phone Number:** 727-328-7403

DRAFT

**Address:** 3701 Central Ave.  
St. Petersburg, FL 33713

#### **Project Description**

The analytical results for the samples contained in this report were submitted for analysis as outlined by the Chain of Custody.

**Project Name:** Annual Compliance

Approved By: \_\_\_\_\_

**Michael Cammarata, Laboratory Manager**

If there are any questions involving this report, the above named should be contacted.

**THIS REPORT SHALL NOT BE REPRODUCED, EXCEPT IN FULL, WITHOUT  
THE WRITTEN APPROVAL OF THE LABORATORY.**

*Advanced Environmental Laboratories certifies that the test results in this report meet all requirements of the NELAC standards, unless notated otherwise in the body of the report.*

**Total Number of Pages = 25**

# Advanced Environmental Laboratories, Inc.

## Analytical Report

Client: Howco, Inc.

Report No.: T0614262

Project Name: Annual Compliance

Date/Time Received: 12/15/06 10:30

Lab Code: T0614262-01

Date/Time Sampled: 12/15/2006 09:15

Client Sample ID: WW Sledge Press

Shipping Method: Client Drop Off

Site: Howco

Sampled By: Shannon Beaman

Matrix: Soil

Sampling Method: C

### TCLP Metals

Analytes:	Dilution	Adjusted MDL	Adjusted PQL	Results	Units	Qualifier(s)	Method	Parameter Comment	Lab
Arsenic	1	0.061	0.24	0.061	mg/L	U	SW6010B		J
Barium	1	0.0047	0.019	0.27	mg/L		SW6010B		J
Cadmium	1	0.00082	0.0033	0.0038	mg/L		SW6010B		J
Chromium	1	0.0024	0.0096	0.0029	mg/L	i V	SW6010B		J
Lead	1	0.011	0.044	0.011	mg/L	U	SW6010B		J
Selenium	1	0.036	0.14	0.036	mg/L	U	SW6010B		J
Silver	1	0.0084	0.034	0.0084	mg/L	U	SW6010B		J

### TCLP Metals (Hg)

Analytes:	Dilution	Adjusted MDL	Adjusted PQL	Results	Units	Qualifier(s)	Method	Parameter Comment	Lab
Mercury	1	0.000050	0.00020	0.000050	mg/L	U	SW7470A		J

### TCLP Semi-Volatile Organic Compounds

Analytes:	Dilution	Adjusted MDL	Adjusted PQL	Results	Units	Qualifier(s)	Method	Parameter Comment	Lab
1,4-Dichlorobenzene	50	0.14	0.58	0.14	mg/L	U	SW8270C		J
2,4,5-Trichlorophenol	50	0.17	0.69	0.17	mg/L	U	SW8270C		J
2,4,6-Trichlorophenol	50	0.11	0.44	0.11	mg/L	U	SW8270C		J
2,4-Dinitrotoluene	50	0.047	0.19	0.047	mg/L	U	SW8270C		J
Cresols, Total	50	0.42	1.7	0.42	mg/L	U	SW8270C		J
Hexachlorobenzene	50	0.088	0.35	0.088	mg/L	U	SW8270C		J
Hexachlorobutadiene	50	0.11	0.42	0.11	mg/L	U	SW8270C		J
Hexachloroethane	50	0.14	0.56	0.14	mg/L	U	SW8270C		J
Nitrobenzene	50	0.050	0.20	0.050	mg/L	U	SW8270C		J
Pentachlorophenol	50	0.16	0.63	0.16	mg/L	U	SW8270C		J
Pyridine	50	0.092	0.37	0.092	mg/L	U	SW8270C		J

### TCLP Volatile Organics

Analytes:	Dilution	Adjusted MDL	Adjusted PQL	Results	Units	Qualifier(s)	Method	Parameter Comment	Lab
1,1-Dichloroethene	10	0.0050	0.020	0.0050	mg/L	U	SW8260B		J
1,2-Dichloroethane	10	0.0036	0.014	0.0036	mg/L	U	SW8260B		J
1,4-Dichlorobenzene	10	0.0030	0.012	0.0030	mg/L	U	SW8260B		J
Benzene	10	0.0030	0.012	0.48	mg/L		SW8260B		J
Carbon Tetrachloride	10	0.0039	0.016	0.0039	mg/L	U	SW8260B		J
Chlorobenzene	10	0.0031	0.012	0.0031	mg/L	U	SW8260B		J
Chloroform	10	0.0041	0.016	0.0041	mg/L	U	SW8260B		J
Methyl ethyl ketone	10	0.0025	0.010	0.13	mg/L		SW8260B		J
Tetrachloroethene	10	0.0043	0.017	0.071	mg/L		SW8260B		J
Trichloroethene	10	0.0043	0.017	0.029	mg/L		SW8260B		J
Vinyl Chloride	10	0.0049	0.020	0.0049	mg/L	U	SW8260B		J

# Advanced Environmental Laboratories, Inc.

## Analytical Report

Client: Howco, Inc.

Report No.: T0614262

Project Name: Annual Compliance

Date/Time Received: 12/15/06 10:30

Surrogates:	Control Limits	% Recovery	Qual.	Method	Prep Method
1,2-Dichloroethane-d4	80 - 120	96		SW8260B	SW1311/SW5030B
4-Bromofluorobenzene	86 - 115	94		SW8260B	SW1311/SW5030B
Toluene d(8)	88 - 110	94		SW8260B	SW1311/SW5030B
2,4,6-Tribromophenol	15 - 112	92		SW8270C	SW1311/SW3510C
2-Fluorobiphenyl	20 - 119	96		SW8270C	SW1311/SW3510C
2-Fluorophenol	20 - 119	44		SW8270C	SW1311/SW3510C
Nitrobenzene d5	23 - 120	96		SW8270C	SW1311/SW3510C
p-Terphenyl-d14	18 - 137	108		SW8270C	SW1311/SW3510C
Phenol-d6	18 - 121	36		SW8270C	SW1311/SW3510C

i The reported value is between the laboratory method detection limit and the laboratory practical quantitation limit.

U The compound was analyzed for but not detected.

V Indicates that the analyte was detected in both the sample and the associated method blank.

J DOH certification #E82574 (AEL-JAX) (FL NELAC certification)



# Advanced Environmental Laboratories, Inc.

## Analytical Report

Client: Howco, Inc.

Report No.: T0614262

Project Name: Annual Compliance

Date/Time Received: 12/15/06 10:30

Lab Code: T0614262-02

Date/Time Sampled: 12/15/2006 09:30

Client Sample ID: Oil Extraction Tank 111

Shipping Method: Client Drop Off

Site: Howco

Sampled By: Shannon Beaman

Matrix: Soil

Sampling Method: C

### TCLP Metals

Analytes:	Dilution	Adjusted MDL	Adjusted PQL	Results	Units	Qualifier(s)	Method	Parameter Comment	Lab
Arsenic	1	0.061	0.24	0.061	mg/L	U	SW6010B		J
Barium	1	0.0047	0.019	0.21	mg/L		SW6010B		J
Cadmium	1	0.00082	0.0033	0.0015	mg/L	i	SW6010B		J
Chromium	1	0.0024	0.0096	0.0052	mg/L	i V	SW6010B		J
Lead	1	0.011	0.044	0.011	mg/L	U	SW6010B		J
Selenium	1	0.036	0.14	0.036	mg/L	U	SW6010B		J
Silver	1	0.0084	0.034	0.0084	mg/L	U	SW6010B		J

### TCLP Metals (Hg)

Analytes:	Dilution	Adjusted MDL	Adjusted PQL	Results	Units	Qualifier(s)	Method	Parameter Comment	Lab
Mercury	1	0.000050	0.00020	0.000050	mg/L	U	SW7470A		J

### TCLP Semi-Volatile Organic Compounds

Analytes:	Dilution	Adjusted MDL	Adjusted PQL	Results	Units	Qualifier(s)	Method	Parameter Comment	Lab
1,4-Dichlorobenzene	50	0.14	0.58	0.14	mg/L	U	SW8270C		J
2,4,5-Trichlorophenol	50	0.17	0.69	0.17	mg/L	U	SW8270C		J
2,4,6-Trichlorophenol	50	0.11	0.44	0.11	mg/L	U	SW8270C		J
2,4-Dinitrotoluene	50	0.047	0.19	0.047	mg/L	U	SW8270C		J
Cresols, Total	50	0.42	1.7	0.42	mg/L	U	SW8270C		J
Hexachlorobenzene	50	0.088	0.35	0.088	mg/L	U	SW8270C		J
Hexachlorobutadiene	50	0.11	0.42	0.11	mg/L	U	SW8270C		J
Hexachloroethane	50	0.14	0.56	0.14	mg/L	U	SW8270C		J
Nitrobenzene	50	0.050	0.20	0.050	mg/L	U	SW8270C		J
Pentachlorophenol	50	0.16	0.63	0.16	mg/L	U	SW8270C		J
Pyridine	50	0.092	0.37	0.092	mg/L	U	SW8270C		J

### TCLP Volatile Organics

Analytes:	Dilution	Adjusted MDL	Adjusted PQL	Results	Units	Qualifier(s)	Method	Parameter Comment	Lab
1,1-Dichloroethene	10	0.0050	0.020	0.0050	mg/L	U	SW8260B		J
1,2-Dichloroethane	10	0.0036	0.014	0.0036	mg/L	U	SW8260B		J
1,4-Dichlorobenzene	10	0.0030	0.012	0.0030	mg/L	U	SW8260B		J
Benzene	10	0.0030	0.012	0.14	mg/L		SW8260B		J
Carbon Tetrachloride	10	0.0039	0.016	0.0039	mg/L	U	SW8260B		J
Chlorobenzene	10	0.0031	0.012	0.0031	mg/L	U	SW8260B		J
Chloroform	10	0.0041	0.016	0.0041	mg/L	U	SW8260B		J
Methyl ethyl ketone	10	0.0025	0.010	0.55	mg/L		SW8260B		J
Tetrachloroethene	10	0.0043	0.017	0.017	mg/L	i	SW8260B		J
Trichloroethene	10	0.0043	0.017	0.0064	mg/L	i	SW8260B		J
Vinyl Chloride	10	0.0049	0.020	0.0049	mg/L	U	SW8260B		J

# Advanced Environmental Laboratories, Inc.

## Analytical Report

Client: Howco, Inc.

Report No.: T0614262

Project Name: Annual Compliance

Date/Time Received: 12/15/06 10:30

Surrogates:	Control Limits	% Recovery	Qual.	Method	Prep Method
1,2-Dichloroethane-d4	80 - 120	90		SW8260B	SW1311/SW5030B
4-Bromofluorobenzene	86 - 115	94		SW8260B	SW1311/SW5030B
Toluene d(8)	88 - 110	96		SW8260B	SW1311/SW5030B
2,4,6-Tribromophenol	15 - 112	102		SW8270C	SW1311/SW3510C
2-Fluorobiphenyl	20 - 119	90		SW8270C	SW1311/SW3510C
2-Fluorophenol	20 - 119	52		SW8270C	SW1311/SW3510C
Nitrobenzene d5	23 - 120	90		SW8270C	SW1311/SW3510C
p-Terphenyl-d14	18 - 137	104		SW8270C	SW1311/SW3510C
Phenol-d6	18 - 121	42		SW8270C	SW1311/SW3510C

i The reported value is between the laboratory method detection limit and the laboratory practical quantitation limit.

U The compound was analyzed for but not detected.

V Indicates that the analyte was detected in both the sample and the associated method blank.

J DOH certification #E82574 (AEL-JAX) (FL NELAC certification)

# Advanced Environmental Laboratories, Inc.

## Analytical Report

Client: Howco, Inc.

Report No.: T0614262

Project Name: Annual Compliance

Date/Time Received: 12/15/06 10:30

### Sample Cross Reference Information

Lab Code: T0614262-01

Site: Howco

Client Sample Number: WW Sledge Press

Matrix: Soil

Test Description	Analysis Method	Prep Method	Analytical Batch ID	Analysis Date/Time	Analyst	Prep Batch ID	Prep Date/Time
TCLP Herbicides	SW8151A	SW1311/METHOD					
TCLP Metals	SW6010B	SW1311/SW3010A	M122106-ICP-2	12/21/2006 19:48	CDC	M122106-ICP-2	12/21/2006 10:1
TCLP Metals (Hg)	SW7470A	SW1311/METHOD	M122706-HG-3	12/27/2006 11:18	CDC	M122706-HG-3	12/27/2006 04:3
TCLP Pesticides	SW8081A	SW1311/SW3510C	sv122106cb	12/21/2006 19:26	JG	oe122006-pest	12/20/2006 11:0
TCLP Semi-Volatile Organic Compounds	SW8270C	SW1311/SW3510C	SV010207L	01/02/2007 13:15	BB	OE010107-BNA	01/01/2007 16:0
TCLP Volatile Organics	SW8260B	SW1311/SW5030B	V122206A	12/22/2006 19:19	BB	V122206A	

If the Analytical Batch ID and Prep Batch ID is null, the analysis was not performed by AEL, and the original report from the subcontracted laboratory will be provided containing this information.

Lab Code: T0614262-02

Site: Howco

Client Sample Number: Oil Extraction Tank 111

Matrix: Soil

Test Description	Analysis Method	Prep Method	Analytical Batch ID	Analysis Date/Time	Analyst	Prep Batch ID	Prep Date/Time
TCLP Herbicides	SW8151A	SW1311/METHOD					
TCLP Metals	SW6010B	SW1311/SW3010A	M122106-ICP-2	12/21/2006 19:48	CDC	M122106-ICP-2	12/21/2006 10:1
TCLP Metals (Hg)	SW7470A	SW1311/METHOD	M122706-HG-3	12/27/2006 11:18	CDC	M122706-HG-3	12/27/2006 04:3
TCLP Pesticides	SW8081A	SW1311/SW3510C	sv122106cb	12/21/2006 19:26	JG	oe122006-pest	12/20/2006 11:0
TCLP Semi-Volatile Organic Compounds	SW8270C	SW1311/SW3510C	SV010207L	01/02/2007 13:15	BB	OE010107-BNA	01/01/2007 16:0
TCLP Volatile Organics	SW8260B	SW1311/SW5030B	V122206A	12/22/2006 19:19	BB	V122206A	

If the Analytical Batch ID and Prep Batch ID is null, the analysis was not performed by AEL, and the original report from the subcontracted laboratory will be provided containing this information.

# Advanced Environmental Laboratories, Inc.

## Analytical Report

Client: Howco, Inc.

Report No.: T0614262

Project Name: Annual Compliance

Date/Time Received: 12/15/06 10:30

### Quality Assurance Report

#### Method Blanks

TCLP Metals							
QCBatchID	Analyte	QC Sample Type	Method	MDL	Result	Units	Qualifier
M122106-ICP-2	Arsenic	Method Blank	SW6010B	0.061	0.061	mg/L	U
M122106-ICP-2	Barium	Method Blank	SW6010B	0.0047	0.0047	mg/L	U
M122106-ICP-2	Cadmium	Method Blank	SW6010B	0.00082	0.00082	mg/L	U
M122106-ICP-2	Chromium	Method Blank	SW6010B	0.0024	0.0064	mg/L	I
M122106-ICP-2	Lead	Method Blank	SW6010B	0.011	0.011	mg/L	U
M122106-ICP-2	Selenium	Method Blank	SW6010B	0.036	0.036	mg/L	U
M122106-ICP-2	Silver	Method Blank	SW6010B	0.0084	0.0084	mg/L	U

TCLP Metals (Hg)							
QCBatchID	Analyte	QC Sample Type	Method	MDL	Result	Units	Qualifier
M122706-HG-3	Mercury	Method Blank	SW7470A	0.000050	0.000050	mg/L	U

TCLP Semi-Volatile Organic Compounds							
QCBatchID	Analyte	QC Sample Type	Method	MDL	Result	Units	Qualifier
SV010207L	1,4-Dichlorobenzene	Method Blank	SW8270C	0.0029	0.0029	mg/L	U
SV010207L	2,4,5-Trichlorophenol	Method Blank	SW8270C	0.0035	0.0035	mg/L	U
SV010207L	2,4,6-Trichlorophenol	Method Blank	SW8270C	0.0022	0.0022	mg/L	U
SV010207L	2,4-Dinitrotoluene	Method Blank	SW8270C	0.00094	0.00094	mg/L	U
SV010207L	Cresols, Total	Method Blank	SW8270C	0.0085	0.0085	mg/L	U
SV010207L	Hexachlorobenzene	Method Blank	SW8270C	0.0018	0.0018	mg/L	U
SV010207L	Hexachlorobutadiene	Method Blank	SW8270C	0.0021	0.0021	mg/L	U
SV010207L	Hexachloroethane	Method Blank	SW8270C	0.0028	0.0028	mg/L	U
SV010207L	Nitrobenzene	Method Blank	SW8270C	0.0010	0.0010	mg/L	U
SV010207L	Pentachlorophenol	Method Blank	SW8270C	0.0032	0.0032	mg/L	U
SV010207L	Pyridine	Method Blank	SW8270C	0.0018	0.0018	mg/L	U

Surrogate(s)	Result	Units	% Recovery	Qualifier	Acceptance Limits
2-Fluorophenol	39	ug/L	78		20 - 119
Phenol-d6	37	ug/L	74		18 - 121
Nitrobenzene d5	34	ug/L	68		23 - 120
2-Fluorobiphenyl	34	ug/L	68		20 - 119
2,4,6-Tribromophenol	39	ug/L	78		15 - 112
p-Terphenyl-d14	42	ug/L	84		18 - 137

TCLP Volatile Organics							
QCBatchID	Analyte	QC Sample Type	Method	MDL	Result	Units	Qualifier
V122206A	1,1-Dichloroethene	Method Blank	SW8260B	0.00050	0.00050	mg/L	U
V122206A	1,2-Dichloroethane	Method Blank	SW8260B	0.00036	0.00036	mg/L	U
V122206A	1,4-Dichlorobenzene	Method Blank	SW8260B	0.00030	0.00030	mg/L	U
V122206A	Benzene	Method Blank	SW8260B	0.00030	0.00030	mg/L	U
V122206A	Carbon Tetrachloride	Method Blank	SW8260B	0.00039	0.00039	mg/L	U
V122206A	Chlorobenzene	Method Blank	SW8260B	0.00031	0.00031	mg/L	U
V122206A	Chloroform	Method Blank	SW8260B	0.00041	0.00041	mg/L	U
V122206A	Methyl ethyl ketone	Method Blank	SW8260B	0.00025	0.00025	mg/L	U
V122206A	Tetrachloroethene	Method Blank	SW8260B	0.00043	0.00043	mg/L	U
V122206A	Trichloroethene	Method Blank	SW8260B	0.00043	0.00043	mg/L	U
V122206A	Vinyl Chloride	Method Blank	SW8260B	0.00049	0.00049	mg/L	U

Surrogate(s)	Result	Units	% Recovery	Qualifier	Acceptance Limits
1,2-Dichloroethane-d4		ug/L			80 - 120
Toluene d(8)		ug/L			88 - 110
4-Bromofluorobenzene		ug/L			86 - 115

# Advanced Environmental Laboratories, Inc.

## Analytical Report

Client: Howco, Inc.

Report No.: T0614262

Project Name: Annual Compliance

Date/Time Received: 12/15/06 10:30

### Quality Assurance Qualifiers:

- I The reported value is between the laboratory method detection limit and the laboratory practical quantitation limit.
- U The compound was analyzed for but not detected.

### Definitions:

Water matrix refers to all aqueous matrices except drinking water, including but not limited to, wastewater, ground water, surface water, aqueous wastes and leach

Soil matrix refers to all non-aqueous matrices, including soils, solids, sludges, semi-solids, and non-aqueous waste samples

All results in mg/kg or % are reported in dry weight basis, unless notated otherwise. All results in mg/L are reported in wet weight basis.

MDL Method Detection Limit, without correction for dilution or moisture content

Adjusted Reporting Limit is the MDL accounting for all dilutions and moisture content calculations.

PQL is defined to be 4 times the MDL, for all results qualified with a 'I' qualifier.

Sampling Method; G=Grab, P=Pump, C=Composite

*The estimated measurements of uncertainty can be provided upon request*

**This is the last page of the analytical report.**



**Pace Analytical Services, Inc.**  
1000 Riverbend Blvd. Suite F  
St. Rose, LA 70087  
Phone: 504.469.0333  
Fax: 504.469.0555  
LELAP # 02006



Report of Laboratory Analysis  
Project Number: 2065301



1/3/2007 15:41:53



**Pace Analytical Services, Inc.**  
1000 Riverbend Blvd. Suite F  
Saint Rose, LA 70087

Phone: 504.469.0333  
Fax: 504.469.0555  
LELAP # 02006

January 03, 2007

Paul Gunsaulies  
ADVANCED ENVIR. LABS, INC  
6601 Southpoint Parkway  
Jacksonville, FL 32216

RE: Project: 2065301  
RE: Project ID: TCLP HERBICIDES

Dear Paul Gunsaulies:

Enclosed are the analytical results for sample(s) received by the laboratory on December 20, 2006. Results reported herein conform to the most current NELAC standards, where applicable, unless otherwise narrated in the body of the report.

If you have any questions concerning this report, please feel free to contact me.

Sincerely,

Karen Brown



**REPORT OF LABORATORY ANALYSIS**

This report shall not be reproduced, except in full, without the written consent of Pace Analytical Services, Inc.



## Sample Cross Reference Report

**Pace Analytical Services, Inc.**

1000 Riverbend Blvd. Suite F  
St. Rose, LA 70087

Phone: 504.469.0333

Fax: 504.469.0555

LELAP # 02006

**Client:** ADVANCED ENVIR. LABS, INC

**Project:** TCLP HERBICIDES

**Project No.:** 2065301

Sample ID	Lab ID	Matrix	Collection Date/Time		Received Date/Time	
T0614104-01	20491613	Soil	12/12/2006	08:30	12/20/2006	10:20
T0614262-02	20491614	Soil	12/15/2006	09:30	12/20/2006	10:20
T0614262-01	20491615	Soil	12/15/2006	09:15	12/20/2006	10:20

1/3/2007 15:41:53

New Orleans Laboratory Certifications  
Louisiana Dept. of Environmental Quality (LELAP) - 02006  
Arkansas Dept. of Environmental Quality - 88-0681  
Louisiana Dept. of Health and Hospitals / Drinking Water - LA060023  
Louisiana Dept. of Health (NELAC) - E87595  
Florida Dept. of Health Environment - E-10266  
U.S. Dept. of Agriculture Foreign Soil Permit - S-47270



## Project Narrative

**Pace Analytical Services, Inc.**  
1000 Riverbend Blvd. Suite F  
St. Rose, LA 70087  
Phone: 504.469.0333  
Fax: 504.469.0555  
LELAP # 02006

---

**Project: 2065301**

---

**Sample Receipt Condition:**

All samples were received in accordance with EPA protocol.

**Holding Times:**

All holding times were met.

**Blanks:**

All blank results were below reporting limits.

**Laboratory Control Samples:**

All LCS recoveries were within QC limits

**Matrix Spikes and Duplicates:**

MS or MSD recoveries outside of QC limits are qualified in the Report of Quality Control section.

**Surrogates:**

Surrogate recoveries outside of QC limits are qualified in the surrogate results section.

---

1/3/2007 15:42:12  
New Orleans Laboratory Certifications  
Louisiana Dept. of Environmental Quality (LELAP) - 02006  
Arkansas Dept. of Environmental Quality - 88-0881  
Louisiana Dept. of Health and Hospitals / Drinking Water - LA060023  
Florida Dept. of Health (NELAC) - E87595  
Kansas Dept. of Health Environment - E-10266  
U.S. Dept. of Agriculture Foreign Soil Permit - S-47270



## Project Narrative

**Pace Analytical Services, Inc.**  
1000 Riverbend Blvd. Suite F  
St. Rose, LA 70087  
Phone: 504.469.0333  
Fax: 504.469.0555  
LELAP # 02006

Project: 2065301

Analytical Method	Batch	Sample used for QC
EPA 8151	80322	Client sample J069221-01 from project 2065259

For the sample used as the original for the DUP or MS/MSD for the batch:

Project sample means a sample from this project was used.

Client sample means a sample from the same client but in a different project was used.

Batch sample means a sample from the a different client was used.

1/3/2007 15:42:12  
**New Orleans Laboratory Certifications**  
Louisiana Dept. of Environmental Quality (LELAP) - 02006  
Arkansas Dept. of Environmental Quality - 88-0681  
Louisiana Dept. of Health and Hospitals / Drinking Water - LA060023  
Florida Dept. of Health (NELAC) - E87595  
Kansas Dept. of Health Environment - E-10266  
U.S. Dept. of Agriculture Foreign Soil Permit - S-47270





## Report of Laboratory Analysis

Pace Analytical Services, Inc.  
1000 Riverbend Blvd. Suite F  
St. Rose, LA 70087  
Phone: 504.469.0333  
Fax: 504.469.0555  
LELAP # 02006

Client: ADVANCED ENVIR. LABS, INC

Client ID: T0614104-01

Site: None

Project: TCLP HERBICIDES

Project No.: 2065301

Sample Qu:

Lab ID: 20491613 (TCLP)

Matrix: Soil

% Moisture: Not Corrected

Description: None

Prep Level: TCLP

Batch: 80322

Method: 8151 Herbs TCLP

Units: mg/L

Target List: 8151 LL20

Prep Factor: 1

Collected: 12/12/06

Received: 12/20/06

Prepared: 12/27/06

Analyzed: 12/31/06 01:21 SPPI (1)

CAS Number	Parameter	Dilution	Result	Qu	Reporting Limit	Reg. Limit
94-75-7	2,4-D	1	ND		0.0200	10.0
93-72-1	2,4,5-TP (Silvex)	1	ND		0.00500	1.00

2 compound(s) reported

ND denotes Not Detected at or above the adjusted reporting limit.  
DF denotes Dilution Factor of extract. The Prep Factor accounts for a non-routine sample size.  
Reporting Limit is corrected for sample size, dilution and moisture content if applicable.  
Qu lists qualifiers. Specific qualifiers are defined at the end of the report.  
For moisture results, wet denotes result is not corrected for moisture and n/a denotes not applicable.  
Regulatory limit denotes an actual regulatory limit or a client-requested notification limit.  
Analysis performed in (1) New Orleans, (2) Baton Rouge, (3) Bossier City, (4) Houston, or (0) subcontract or field.

New Orleans Laboratory Certifications  
Louisiana Dept. of Environmental Quality (LELAP) - 02006  
Arkansas Dept. of Environmental Quality - 88-0681  
Louisiana Dept. of Health and Hospitals / Drinking Water - LA060023  
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Kansas Dept. of Health Environment - E-10266  
U.S. Dept. of Agriculture Foreign Soil Permit - S-47270

1/3/2007 15:42:14



## Report of Laboratory Analysis

Pace Analytical Services, Inc.  
1000 Riverbend Blvd. Suite F  
St. Rose, LA 70087  
Phone: 504.469.0333  
Fax: 504.469.0555  
LELAP # 02006

Client: ADVANCED ENVIR. LABS, INC

Client ID: T0614262-02  
Project: TCLP HERBICIDES  
Lab ID: 20491614 (TCLP)  
Description: None  
Method: 8151 Herbs TCLP

Site: None  
Project No.: 2065301 Sample Qu:  
Matrix: Soil % Moisture: Not Corrected  
Prep Level: TCLP Batch: 80322  
Units: mg/L Target List: 8151 LL20  
Collected: 12/15/06 Received: 12/20/06  
Prepared: 12/27/06 Analyzed: 12/31/06 01:49 SPPL(1)

Prep Factor: 1

CAS Number	Parameter	Dilution	Result	Qu	Reporting Limit	Reg. Limit
94-75-7	2,4-D	1	0.0202		0.0200	10.0
93-72-1	2,4,5-TP (Silvex)	1	ND		0.00500	1.00

2 compound(s) reported

ND denotes Not Detected at or above the adjusted reporting limit.  
DF denotes Dilution Factor of extract. The Prep Factor accounts for a non-routine sample size.  
Reporting Limit is corrected for sample size, dilution and moisture content if applicable.  
Qu lists qualifiers. Specific qualifiers are defined at the end of the report.  
For moisture results, wet denotes result is not corrected for moisture and n/a denotes not applicable.  
Regulatory limit denotes an actual regulatory limit or a client-requested notification limit.  
Analysis performed in (1) New Orleans, (2) Baton Rouge, (3) Bossier City, (4) Houston, or (0) subcontract or field.

New Orleans Laboratory Certifications  
Louisiana Dept. of Environmental Quality (LELAP) - 02006  
Arkansas Dept. of Environmental Quality - 88-0681  
Louisiana Dept. of Health and Hospitals / Drinking Water - LA060023  
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Kansas Dept. of Health Environment - E-10266  
U.S. Dept. of Agriculture Foreign Soil Permit - S-47270

1/3/2007 15:42:14



## Report of Laboratory Analysis

Pace Analytical Services, Inc.  
1000 Riverbend Blvd. Suite F  
St. Rose, LA 70087  
Phone: 504.469.0333  
Fax: 504.469.0555  
LELAP # 02006

Client: ADVANCED ENVIR. LABS, INC

Client ID: T0614262-01

Site: None

Project: TCLP HERBICIDES

Project No.: 2065301

Sample Qu:

Lab ID: 20491615 (TCLP)

Matrix: Soil

% Moisture: Not Corrected

Description: None

Prep Level: TCLP

Batch: 80322

Method: 8151 Herbs TCLP

Units: mg/L

Target List: 8151 LL20

Prep Factor: 1

Collected: 12/15/06

Received: 12/20/06

Prepared: 12/27/06

Analyzed: 12/31/06 02:16 SPP1 (1)

CAS Number	Parameter	Dilution	Result	Qu	Reporting Limit	Reg. Limit
94-75-7	2,4-D	1	ND		0.0200	10.0
93-72-1	2,4,5-TP (Silvex)	1	ND		0.00500	1.00

2 compound(s) reported

ND denotes Not Detected at or above the adjusted reporting limit.  
DF denotes Dilution Factor of extract. The Prep Factor accounts for a non-routine sample size.  
Reporting Limit is corrected for sample size, dilution and moisture content if applicable.  
Qu lists qualifiers. Specific qualifiers are defined at the end of the report.  
For moisture results, wet denotes result is not corrected for moisture and n/a denotes not applicable.  
Regulatory limit denotes an actual regulatory limit or a client-requested notification limit.  
Analysis performed in (1) New Orleans, (2) Baton Rouge, (3) Bossier City, (4) Houston, or (0) subcontract or field.

New Orleans Laboratory Certifications  
Louisiana Dept. of Environmental Quality (LELAP) - 02006  
Arkansas Dept. of Environmental Quality - 88-0681  
Louisiana Dept. of Health and Hospitals / Drinking Water - LA060023  
Florida Dept. of Health (NELAC) - E87593  
Kansas Dept. of Health Environment - E-10266  
U.S. Dept. of Agriculture Foreign Soil Permit - S-47270

1/3/2007 15:42:14



## Report of Quality Control

Pace Analytical Services, Inc.

1000 Riverbend Blvd. Suite F  
St. Rose, LA 70087

Phone: 504.469.0333

Fax: 504.469.0555

LELAP # 02006

Method: EPA 8151

Project: 2065301

LCS: 20492527 12/30/2006 11:04:00 P

Batch: 80322

MS: 20492528 12/30/2006 11:59:00 P

Units: mg/L

Original for MS: 20491307 Batch Sample

Parameter Name	LCS	LCS	LCS	LCS	MS	MS	MSD (1)MS	QC Limits			Max	Qu
	Spike	%Rec	%Rec	RPD	Spike	%Rec	%Rec	LCS	MS/MSD	RPD		
2,4-D	0.1	91			0.1	105	13	153 *	25 - 163	10 - 182	20	
2,4,5-TP (Silvex)	0.01	100			0.01	96	17	130 *	30 - 165	15 - 174	20	

2 compound(s) reported

\* denotes recovery outside of QC limits.

MS spike concentrations are not corrected for moisture content of the spiked sample.

(1) MS RPD is calculated via SW-846 rules: on the basis of spiked sample concentrations rather than spike recoveries.

1/3/2007 15:42:16

New Orleans Laboratory Certifications

Louisiana Dept. of Environmental Quality (LELAP) - 02006

Arkansas Dept. of Environmental Quality - 88-0681

Louisiana Dept. of Health and Hospitals / Drinking Water - LA060023

Florida Dept. of Health (NELAC) - E87595

Kansas Dept. of Health Environment - E-10266

U.S. Dept. of Agriculture Foreign Soil Permit - S-47270



## Report of Batch Surrogate Recovery

**Pace Analytical Services, Inc.**  
 1000 Riverbend Blvd. Suite F  
 St. Rose, LA 70087  
 Phone: 504.469.0333  
 Fax: 504.469.0555  
 LELAP # 02006

Report: 2065301

Batch: 80322

Lab ID	Type and Qualifiers	Sur 1 %Rec	Sur 2 %Rec	Sur 3 %Rec	Sur 4 %Rec	Sur 5 %Rec	Sur 6 %Rec	Sur 7 %Rec	Sur 8 %Rec
20491613	Sample	97	86						
20491614	Sample	106	64						
20491615	Sample G1	208 *	89						
20492526	BLANK	94	83						
20492527	LCS	97	90						
20492528	MS	87	83						
20492529	MSD	20	18						

QC limits: 10-181 10-181

Sur 1: 2,4-DCPA (Conf)(S)

Sur 2: 2,4-DCPA (S)

\* denotes surrogate recovery outside of QC limits.  
 D denotes surrogate recovery is outside of QC limits due to sample dilution, and is not considered an excursion.  
 A Lab ID consisting of a batch number with a B suffix is a method blank.  
 A Lab ID consisting of a batch number with a S suffix is an LCS.  
 A Lab ID with a MS suffix is a matrix spike.  
 A Lab ID with a MSD suffix is a matrix spike duplicate.

1/3/2007 15:42:18  
**New Orleans Laboratory Certifications**  
 Louisiana Dept. of Environmental Quality (LELAP) - 02006  
 Arkansas Dept. of Environmental Quality - 88-0681  
 Louisiana Dept. of Health and Hospitals / Drinking Water - LA060023  
 Florida Dept. of Health (NELAC) - E07595  
 Kansas Dept. of Health / Environment - E-10266  
 U.S. Dept. of Agriculture Foreign Soil Permit - S-47270





## Report of Method Blank

Pace Analytical Services, Inc.  
1000 Riverbend Blvd. Suite F  
St. Rose, LA 70087  
Phone: 504.469.0333  
Fax: 504.469.0555  
LELAP # 02006

Lab ID: 20492526 (TCLP)

Description: 8151 Herbs TCLP Blank

Project No.: 2065301

Method: EPA 8151

Batch: 80322

Units: mg/L

Prep Factor: 1

Leached:

Prepared: 27-Dec-06

Analyzed: 12/30/06 22:36 SPPL(1)

CAS Number	Parameter	Dilution	Result	Qu	Reporting Limit
94-75-7	2,4-D	1	ND		0.0200
93-72-1	2,4,5-TP (Silvex)	1	ND		0.00500

2 compound(s) reported

ND denotes Not Detected at or above the reporting limit.

DF denotes Dilution Factor.

RL denotes sample Reporting Limit.

Qu lists qualifiers. Specific qualifiers are defined at the end of the report.

Analysis performed in (1) New Orleans, (2) Baton Rouge, (3) Bossier City, (4) Houston, or (0) subcontract or field.

1/3/2007 15:42:20

New Orleans Laboratory Certifications  
Louisiana Dept. of Environmental Quality (LELAP) - 02006  
Arkansas Dept. of Environmental Quality - 88-0681  
Louisiana Dept. of Health and Hospitals / Drinking Water - LA060023  
Florida Dept. of Health (NELAC) - E87595  
Kansas Dept. of Health Environment - E-10266  
U.S. Dept. of Agriculture Foreign Soil Permit - S-47270



## Report Qualifiers

**Pace Analytical Services, Inc.**  
1000 Riverbend Blvd. Suite F  
St. Rose, LA 70087  
Phone: 504.469.0333  
Fax: 504.469.0555  
LELAP # 02006

Project: **2065301**

Analyte Qualifiers	
Qualifier	Qualifier Description
G1	Interferences are present which caused poor surrogate recovery.

1/3/2007 15:42:22

New Orleans Laboratory Certifications  
Louisiana Dept. of Environmental Quality (LELAP) - 02006  
Arkansas Dept. of Environmental Quality - 88-0681  
Louisiana Dept. of Health and Hospitals / Drinking Water - LA060023  
Florida Dept. of Health (NELAC) - E87595  
Kansas Dept. of Health Environment - E-10266  
U.S. Dept. of Agriculture Foreign Soil Permit - S-47270



**Advanced Environmental Laboratories, Inc.**

6601 Southpoint Pkwy. • Jacksonville, FL 32216 • 904.363.9350 • Fax 904.363.9354 • E82574  
 9610 Princess Palm Ave. • Tampa, FL 33619 • 813.630.9616 • Fax 813.630.4327 • E84589  
 2106 NW 67th Place, Ste. 7 • Gainesville, FL 32606 • 352.367.1500 • Fax 352.367.0050 • E82620  
 528 S. North Lake Blvd., Ste. 1016 • Altamonte Springs, FL 32701 • 407.937.1594 • Fax 407.937.1597 • E53076

LAB NUMBER: \_\_\_\_\_

Page 1 of 1

206534

CLIENT NAME: <u>AEL</u>		PROJECT NAME: <u>Herbicides</u>		BOTTLE SIZE & TYPE														LAB NUMBER
ADDRESS:		P.O. NUMBER/PROJECT NUMBER:		ANALYSIS REQUIRED <u>TCLP Herbicides</u>														
		PROJECT LOCATION:																
PHONE:		FAX:																
CONTACT: <u>Paul G</u>		SAMPLED BY:																
TURN AROUND TIME:		REMARKS/SPECIAL INSTRUCTIONS:																
<input checked="" type="checkbox"/> STANDARD <input type="checkbox"/> RUSH																		
WW=waste water    SW=surface water    GW=ground water    DW=drinking water    OIL    A=air    SO=soil    SL=sludge																		
SAMPLE ID	SAMPLE DESCRIPTION	Grab Comp	SAMPLING		MATRIX	NO. COUNT	Preserv											
			DATE	TIME														
1	T0614104-01	G	12-12-06	9:30	SO	1	X	2049 1613										
2	T0614262-02	G	12-15-06	9:30	SO	1	X	614										
3	T0614262-01	G	12-15-06	9:15	SO	1	X	615										

I=Ice    H=(HCl)    S=(H2SO4)    N=(HNO3)    T=(Sodium Thiosulfate)		Relinquish by:		Date	Time	Received by:	Date	Time		
Shipment Out:	Method	Sample Kit	Cooler #	1	Carey	12-19-06	17:00	Fedex	12-19-06	17:00
Ret:	Via:	RB	D/T	2	Ted	12-20-06	1020	M/M	12-20-06	1020
		AB	D/T	3						
		Trip Bl.		4						

Received on ☒ Yes ☐ No    QC ☐ sent    ☐ received

2.6°

**Chain-of-Custody for AEL Tampa to AEL Jax**

AEL Tampa  
9610 Princess Palm Avenue  
Tampa, FL 33619  
813-630-9616 Fax 813-630-4327  
Contact Person: Michael Cammarata

AEL Jax  
6601 Southpoint Parkway  
Jacksonville, FL 32216  
904-363-9350 Fax 904-363-9354  
Contact Person: Sean Hyde

**Project #:** T0614262

**CustomerName:** Howco, Inc.

**Collector:** Shannon Beaman

☐ **Check if Rush**

Lab Code	Client Sample ID	Test	Matrix	Collect Date / Time	Receive Date	Due Date	# Bottles	Bottle Type (Pres.)
T0614262-01	WW Sledge Press	Hg (TCLP)	Soil	12/15/2006 9:15	12/15/06 10:30	12/29/2006	_____	_____
T0614262-01	WW Sledge Press	TCLP ICP Metals	Soil	12/15/2006 9:15	12/15/06 10:30	12/29/2006	_____	_____
T0614262-01	WW Sledge Press	TCLP Pesticides	Soil	12/15/2006 9:15	12/15/06 10:30	12/29/2006	_____	_____
T0614262-01	WW Sledge Press	TCLP Semi-Volatiles	Soil	12/15/2006 9:15	12/15/06 10:30	12/29/2006	_____	_____
T0614262-01	WW Sledge Press	TCLP Volatiles	Soil	12/15/2006 9:15	12/15/06 10:30	12/29/2006	_____	_____
T0614262-02	Oil Extraction Tank 111	Hg (TCLP)	Soil	12/15/2006 9:30	12/15/06 10:30	12/29/2006	_____	_____
T0614262-02	Oil Extraction Tank 111	TCLP ICP Metals	Soil	12/15/2006 9:30	12/15/06 10:30	12/29/2006	_____	_____
T0614262-02	Oil Extraction Tank 111	TCLP Pesticides	Soil	12/15/2006 9:30	12/15/06 10:30	12/29/2006	_____	_____
T0614262-02	Oil Extraction Tank 111	TCLP Semi-Volatiles	Soil	12/15/2006 9:30	12/15/06 10:30	12/29/2006	_____	_____
T0614262-02	Oil Extraction Tank 111	TCLP Volatiles	Soil	12/15/2006 9:30	12/15/06 10:30	12/29/2006	_____	_____

Tampa Relinquisher: \_\_\_\_\_

Shipping Receiver: AEL Courier

Date/Time: \_\_\_\_\_

Shipping Relinquisher: AEL Courier

Jacksonville Receiver: \_\_\_\_\_

Date/Time: \_\_\_\_\_



Advanced Environmental Labs Inc

Advanced Environmental Labs  
9610 Princess Palm Ave.  
Tampa, FL 33619

Client: HOCWO

Project name: Annual

Date/Time Rcvd: 12/15/00 10:30

Log-In request number: 70614262

Received by: km

Completed by: HR

**Cooler/Shipping Information:**

Courier: ☐ AEL ☒ Client ☐ UPS ☐ Blue Streak ☐ FedEx ☐ Other (describe): \_\_\_\_\_

Type: ☒ Cooler ☐ Box ☐ Other (describe): \_\_\_\_\_

Cooler temperature: Identify the cooler and document the temperature blank or ice water measurement

Cooler ID					
Temp (°C)	<u>0</u>				
Temp taken from	<input type="checkbox"/> Temp blank <input checked="" type="checkbox"/> Sample bottle	<input type="checkbox"/> Temp blank <input type="checkbox"/> Sample bottle	<input type="checkbox"/> Temp blank <input type="checkbox"/> Sample bottle	<input type="checkbox"/> Temp blank <input type="checkbox"/> Sample bottle	<input type="checkbox"/> Temp blank <input type="checkbox"/> Sample bottle
Temp measured with	<input checked="" type="checkbox"/> IR gun (ID: 10K) <input type="checkbox"/> Thermometer (enter ID):	<input type="checkbox"/> IR gun (ID: 10K) <input type="checkbox"/> Thermometer (enter ID):	<input type="checkbox"/> IR gun (ID: 10K) <input type="checkbox"/> Thermometer (enter ID):	<input type="checkbox"/> IR gun (ID: 10K) <input type="checkbox"/> Thermometer (enter ID):	<input type="checkbox"/> IR gun (ID: 10K) <input type="checkbox"/> Thermometer (enter ID):

**Other Information:**

Any "NO" responses or discrepancies should be explained in the "Comments" section below.

**CHECKLIST**

YES NO NA

1. Were custody seals on shipping container(s) intact?			<input checked="" type="checkbox"/>
2. Were custody papers properly included with samples?	<input checked="" type="checkbox"/>		
3. Were custody papers properly filled out (ink, signed, match labels)?	<input checked="" type="checkbox"/>		
4. Did all bottles arrive in good condition (unbroken)?	<input checked="" type="checkbox"/>		
5. Were all bottle labels complete (sample #, date, signed, analysis, preservatives)?	<input checked="" type="checkbox"/>		
6. Did the sample labels agree with the chain of custody?	<input checked="" type="checkbox"/>		
7. Were correct bottles used for the tests indicated?	<input checked="" type="checkbox"/>		
8. Were proper sample preservation techniques indicated on the label?	<input checked="" type="checkbox"/>		
9. Were samples received within holding times?	<input checked="" type="checkbox"/>		
10. Were all VOA vials checked for the presence of air bubbles?			<input checked="" type="checkbox"/>
11. Were there air bubbles present in the VOA vials?			<input checked="" type="checkbox"/>
12. Were samples in direct contact with wet ice? If "No," check one: <input type="checkbox"/> NO ICE <input type="checkbox"/> BLUE ICE	<input checked="" type="checkbox"/>		
13. Was the cooler temperature less than 6°C?	<input checked="" type="checkbox"/>		
14. Were sample pHs checked and recorded by Sample control? <i>NOTE: VOA samples are checked by laboratory analysts.</i>			<input checked="" type="checkbox"/>
15. Were the sample containers provided by AEL?	<input checked="" type="checkbox"/>		
16. Were samples accepted into the laboratory?	<input checked="" type="checkbox"/>		

**Comments:**

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revised 8/01

## Comments on SNC Facility:

Dregne

## FLD152764767, Howco Environmental Servi Including DEP Comments and EPA Conference Call Notes

DEP Comments	Author	Date
05/16/05 - Draft Short Form Consent Order issued. Suspense is June 3, 2005.	Dregne_J	5/19/2005 7:53:46 PM
07/08/05 - Amended Short Form CO sent to HOWCO for signature. Anticipate Order being signed.	Dregne_J	7/11/2005 6:02:19 PM
EPA Comments - None	From Conference Call Notes	
EPA Justification Indicators (JI)		
1 - Cases.involving.violations.of.two.or.more.media;(e.g.,environmental.protection.statutes)		
> Day 210 Notes/Enforcement Discretion Factors		
4/17/02 - HOWCO has agreed to Consent Order and penalty. District waiting for OK from Division of Solid Waste that financial assurance paperwork has been processed.;	dregne_j	4/17/2002 9:18:55 AM
6/26/02 Division of Solid Waste has given verbal response that HOWCO has met financial assurance requirements. SW will send in compliance letter on 6/28/02. District will send Draft Consent Order to HOWCO on 6/28/02. HOWCO has agreed to sign Order.;	dregne_j	6/26/2002 11:22:44 AM
07/05/02 Returned to compliance. CO issued. Awaiting execution.;	dregne_j	7/11/2002 8:26:00 PM

[Input New DEP Comments](#)   [Input New Justification Indicator](#)

## Activity History for:

## EPAID: FLD152764767, Howco Environmental Services

Act Code	Date Done	Project	Prep Notes	Completion Notes
4 CEI	04/16/90	96098	DOWNLOADED FROM RCRIS ON 18-OCT-96	
3 WLI	09/21/90	96098	DOWNLOADED FROM RCRIS ON 18-OCT-96	
FR	10/16/90	96098	DOWNLOADED FROM RCRIS ON 18-OCT-96	
OTH	10/25/90	96098	DOWNLOADED FROM RCRIS ON 18-OCT-96	
NOVI	08/06/91	96098	DOWNLOADED FROM RCRIS ON 18-OCT-96	
1 COE	06/19/92	96098	DOWNLOADED FROM RCRIS ON 18-OCT-96	OGC# 91-1176 #500.00
5 CEI	02/19/93	96098	DOWNLOADED FROM RCRIS ON 18-OCT-96	
4 WLI	04/12/93	96098	DOWNLOADED FROM RCRIS ON 18-OCT-96	INSERTED INTO OCULUS
SPL	04/21/93	96098	DOWNLOADED FROM RCRIS ON 18-OCT-96	FEB 29 2008
CAP	11/04/93	33721		CAP/QAPP Add. submitted
LTR	11/05/93	64407	Response to Dept. settlement	INITIAL Expect response on settlement offer from HOWCO atty.



			offer due	
CAP	11/08/93	33721	CAP Add. submitted to Tally for review	CAP Add. review recvd from Tally-approved
QAPP	11/08/93	33721	QAPP Add. #2 submitted to Tally for review	Returned w/ revisions required
CALL	12/03/93	64407	Counter offer from Joseph McNabb due	
LTR	01/27/94	64407	Settlement offer to L. Lockett-Response due	J. McNabb scheduled meeting to discuss case
EMT	03/09/94	64407	B. Knauss to make decision on further enforcement actions	Case closed-outstanding issues addressed in subsequent inspections
CEI	03/15/94	67934	WL issuance due	
QAPP	03/31/94	33721	QAPP revisions due/DEP ltr. also incl. notice of CAP approval	
QAPP	05/25/94	33721	QAPP review due from Tally	QAPP approved-D. Adams
WLI	05/31/94	67934	Response to WL due	B. Knauss to schedule meeting upon receipt of sampling guidelines
COND	07/26/94	33721	Notice to implement CAP-first monthly progress report due	Site Health&Safety plan prepared/well survey begun
CAP	10/04/94	33721	2nd monthly progress report due	
CAP	11/03/94	33721	3rd monthly progress report due	
CAP	12/01/94	33721	4th monthly progress report due	
CAP	12/28/94	33721	Monthly progress report due	
CAP	02/02/95	33721	Monthly progress report due	No progress reported in progress report-notified consultant will be proceeding w/ enf. action against HOWCO to implement CAP
CAP	03/03/95	33721	Recvd. progress report-will install 6 MW's on 3/13 & 3/14	
CAP	04/05/95	33721	Monthly progress report due-wells to have been installed and sampled in March	
COND	04/14/95	33721	Status report due-initial GW sampling results from 6 wells	GW sampling results indicate heavy cont.-supplemental work proposed
COND	05/04/95	33721	Monthly status report recvd.-preparing proposal for further work	
COND	06/06/95	33721	Monthly status report due w/ proposal for further work	
LTR	06/26/95	67934	Settlement offer to T. Hagan/Tastemaker case also-response due	L. Lockett-agree to offer if can drop Part A permit
COND	07/03/95	33721	Monthly status report due	
COND	07/07/95	33721	June status report promised further scope of work submittal	Supplemental Scope of Work submitted
COND	08/04/95	33721	Monthly status report due	
			FGS proposal for further	



CAP	08/24/95	33721	work to J. Armstrong 7/13-review due	Recvd. comments-further soil confirm. samples needed otherwise OK
COND	09/05/95	33721	Monthly status report due	Further work to be implemented upon receipt of J. Armstrong's comments
COND	10/10/95	33721	Status report due on implementation of further work-review to FGS 9/6	FGS reports supplemental work to be implemented 10/95
COND	10/31/95	75977	apply for permit renewal	
COND	11/07/95	33721	Monthly status report due-FGS implementing supp. work	Soil sampling & wells installed between 10/24-11/3
COND	12/04/95	33721	Monthly status report due	CAR draft to be submitted to HOWCO 12/95
COND	12/29/95	33721	Monthly status report & CAR due per 12/1 status report	Still working on CAR-telecon w/ Maura Clark 1/11-payment problems, have suspended work
CALL	01/11/96	33721	Maura Clark says FGS pres. to meet w/ T. Hagan over payment problems-will notify me of results	February report says 5 areas of site are ATRP-eligible, will be meeting with Tally personnel over reimbursement issues
COND	02/01/96	33721	Monthly status report due	CAR in preparation-5 areas of site ATRP eligible
COND	03/04/96	33721		February report-CAR 95% done-will submit by end of March
COND	04/04/96	33721	Monthly report and CAR due	Recvd. status report promising CAR by 4/12
CAR	04/19/96	33721	Recvd. in SWD 4/19-forwarded to BWC 4/23-review due	Recvd. CAR review from J. Armstrong
COND	05/03/96	33721		Submittal of April status report
COND	06/01/96	33721	May status report due	
COND	07/05/96	33721	June status report due	
CAR	07/09/96	33721	CAR review comments to HOWCO-Phase II CAP due	Meeting held 8/12-HOWCO will do no further work until site is ranked for ATRP funding
COND	08/05/96	33721		Monthly status report recvd.
COND	09/06/96	33721		Monthly status report recvd.-no further work will be done until site is ranked for ATRP funding
CCD	10/06/96	33721		Site ATRP eligible & ranked below level to require further assess
CEI	10/16/96	100547	Inspection report due	Option 1 WL issued
CCD	10/16/96	67934	Violation addressed as part of 10/16/96 CEI	
SNY	04/02/97	100547		
WLI	04/11/97	100547	Response to WL due	L. Lockett left message 5/2: will send written response 2 weeks
CPAM	04/11/97	100547	PA to Tally 4/11 - review due	PA approved
EMT	07/16/97	100547	Position letter to HOWCO due	
LTR	09/08/97	100547	Settlement offer to L. Lockett 9/8-response due	Letter from L. Lockett-going on vacation, will respond after 9/25
LTR	09/16/97	100547	Settle offer due from L. Lockett	



LTR	12/16/97	100547	Settlement offer to L. Lockett 12/16 - response due	First detailed written response to WL ever received
LTR	03/06/98	100547	Response to settlement offer due	
DCOI	03/11/98	100547		
CALL	09/14/98	100547	Telecon w/ Hagan - CO due or issue NOV	
CEI	09/29/98	100547	Inspection report due	
DCOI	01/07/99	100547	Latest draft issued - response due	
DCOI	04/28/99	100547	Final draft mailed 4/28 - return of signed Order due	
SRVC	05/03/99	225256		response to 5th NOD
SRVC	05/11/99	225256		response to 5th NOD (statistical sampling plan)
FR	06/08/99	225256		completed review of responses to 5th NOD, inadequate
WLI	06/10/99	225256		penalty assessed for 6th NOD
COE	06/16/99	100547	<i>OGC #97-2120</i>	CO includes penalties, 2nd contain upgrades and waste determ
SNN	06/16/99	100547		Facility RTC w/ execution of CO 6/16/99
COND	07/06/99	100547	1 of 12 \$1762.50 payment due	
COND	07/12/99	100547	TCLP sampling of WWTS and OES done 7/12 - results due	
COND	07/19/99	100547	Proof of publication due	
COND	07/21/99	100547	Pressure test on all underground piping due	Testing performed 7/21 - results recvd SWD 8/25 - all pass
EMT	07/21/99	225256		
LTR	07/30/99	225256		response to 6th NOD due 30 days after DEP response
COND	08/24/99	100547	2 of 12 \$1762.50 payment due	
LTR	08/27/99	225256		written response concerning DEP's position
COND	09/16/99	100547	Notification of piping upgrade due	Facility declined P2 credit for piping upgrade-paid addtl \$5000
COND	09/16/99	100547	\$5000 payment due - did not elect to upgrade piping w/ 2nd containment	
CEI	09/17/99	230025		Inspection report completed and sent out
COND	09/24/99	100547	3 of 12 \$1762.50 payment due	
LTR	09/24/99	225256		solid waste permitting comments, including asking for \$2000 fee
PCL	09/28/99	230025		In-compliance letter sent out
COND	10/11/99	100547	2 of 4 TCLP sampling of WWTS and OES due	sample failed for benzene - next 2 batches to be sampled
SRVC	10/27/99	225256		official response to 6th NOD
COND	10/29/99	100547	4 of 12 \$1762.50 payment due	
LTR	11/19/99	225256		howco respond by 12/3 on what their position on sampling & analysis of outbound oil
COND	11/22/99	100547	WWT sludge sampled - results due	3 additional batches sampled- 1st failed, nest two passed
COND	11/29/99	100547	5 of 12 \$1762.50 payment due	



COND	11/30/99	100547	WWT sludge sampled - results due	
FR	12/03/99	225256		no response from howco; application determined to be complete
COND	12/10/99	100547	PE cert due of completion of UO container storage area upgrades	
COND	12/10/99	100547	PE cert due of contain for Tank #110 & #111	
COND	12/10/99	100547	Completion of application of impervious coating to contain #2	
COND	12/10/99	100547	PE cert due of completion of south contain #2 upgrade	
COND	01/19/00	100547	3 of 4 TCLP sampling of WWTS and OES due	Took split samples w/ Howco
LTR	01/19/00	100547	D. Roehm ltr w/ sludge TCLP results - 90-day time limit for shipment of HW sludge	
MEMO	01/19/00	100547	Took split samples w/ Howco - results due	
LTR	01/28/00	100547	Response due - Contain#1 certification & Dec and Jan payments	
CEI	09/19/00	241880		INSPECTION REPORT BEING DRAFTED.
EPI	03/20/01	241880		
WLI	03/21/01	241880		AWAITING RESPONSE FROM GENERATOR. MEETING SCHEDULED FOR APRIL 19TH.
SNY	03/21/01	241880		
EMT	04/19/01	241880		HOWCO WILL PROVIDE COUNTEROFFER WITHIN ONE WEEK.
MEET	04/20/01	241880		VISITED SITE TO CHECK CORRECTED VIOLATIONS.
LTR	04/23/01	241880		EXTENSION FOR REPLY TO WL APPROVED UNTIL 23 MAY 2001.
SRVC	05/04/01	241880		COUNTER OFFER RECEIVED. OFFER \$200.00. REJECTED.
MEET	05/08/01	241880		DISCUSS FORMAT FOR WL RESPONSE AND HW USED OIL PROBLEM.
LTR	05/18/01	241880		REJECTION OF HOWCO PENALTY COUNTEROFFER. DRAFT SCO SUBMITTED.
SRVC	05/29/01	241880		COUNTEROFFER OF \$500 RECEIVED FROM HOWCO. UNACCEPTABLE. DRAFTING CASE REPORT FOR OGC.
CEI	08/14/01	251080		
SNY	08/14/01	251080		
FR	08/16/01	225256		data cleanup - permit has been issued, case closed
CWOE	08/16/01	225256		
CCD	08/16/01	225256		
CRO	08/31/01	241880		
EMT	10/05/01	241880		TELECONFERENCE- HAGAN/LOCKETT/DEMPSEY/TAM/GEPHART/DREGNE.
SCOI	10/10/01	241880		ORDER SIGNED BY HAGAN.
SCOE	10/26/01	241880	OGC # 01-1496C \$4,100	FIRST PAYMENT DUE IN 90 DAYS>
SNN	10/26/01	241880		
CFFE	10/26/01	241880		
WLI	11/05/01	251080		SUSPENSE NOV 20, 2001.



EMT	12/04/01	251080		WILL COME BACK WITH COUNTER OFFER IN THIRTY DAYS.
COND	12/14/01	241880		FIRST PAYMENT RECEIVED. SECOND PAYMENT DUE 10 FEB 02. OGC#01-1496C.
SRVC	01/04/02	251080		COUNTER OFFER RECEIVED, \$1898.00. UNDER REVIEW.
COND	02/04/02	241880		SECOND PAYMENT RECEIVED. THIRD PAYMENT DUE 10 MARCH 2001. \$1000.
LTR	02/27/02	251080		HOWCO COUNTEROFFER REJECTED. NEW OFFER PROPOSED USING ELRA. \$10,000.
LTR	02/28/02	251080		ELRA COUNTEROFFER LETTER.
SRVC	03/18/02	251080		DEPARTMENT OFFER ACCEPTED. WAITING FOR FINANCIAL ASSURANCE SUBMISSION TO SOLID WASTE. COST ESTIMATE APPROVED.
COND	04/18/02	241880		THIRD PAYMENT RECEIVED, FOURTH PAYMENT DUE. \$1000.
CALL	04/25/02	251080		COMPANY USING FICTITIOUS NAME, MUST CHANGE PERMIT NAME TO REAL NAME BEFORE SOLID WASTE DIVISION WILL PROCESS FINANCIAL ASSURANCE.
COND	04/29/02	241880		FINAL PAYMENT RECEIVED. \$1000.00.
PCL	05/08/02	241880		
CCD	05/08/02	241880		
LTR	06/14/02	251080		E-MAIL FROM HOWCO. ALL REQUIRED FINANCIAL ASSURANCE DOCUMENTS FILED.
LTR	07/03/02	251080		CONFIRMATION FROM SW THAT ALL FINANCIAL ASSURANCE DOCUMENTS IN ORDER.
SCOI	07/08/02	251080		SUSPENSE JULY 25, 2002.
CEI	07/24/02	259973		PREPARING DRAFT OF CEI REPORT
SCOE	07/26/02	251080	OGC# 02-0702 \$10,100.00	
SNN	07/26/02	251080		
CFFE	07/26/02	251080		
RCL	07/26/02	251080		
PR	08/15/02	251080		FIRST PAYMENT RECEIVED. SECOND PAYMENT DUE SEP 5 2002.
PR	09/17/02	251080		SECOND PAYMENT RECEIVED. THIRD PAYMENT DUE OCT 5, 2002.
PR	10/11/02	251080		THIRD PAYMENT RECEIVED. FOURTH PAYMENT DUE NOVEMBER 5, 2002.
PR	11/12/02	251080		FOURTH PAYMENT RECEIVED. FIFTH PAYMENT DUE DECEMBER 5, 2002.
WLI	11/18/02	259973	FACILITY TO SCHEDULE MEETING WITH DEP WITHIN 15 DAYS OF RECEIPT OF WL	
PR	12/09/02	251080		FIFTH PAYMENT RECEIVED. 1010.00. SIXTH PAYMENT DUE JAN 5, 2003.
EMT	12/11/02	259973	MEETING WITH FACILITY PERSONNEL TO REVIEW ALLEGED VIOLATIONS	OUTCOME OF MEETING - ISSUE SHORT FORM CO FOR PENALTIES ASSESSED
DCOI	12/19/02	259973		FACILITY IS TO SIGN DRAFT CO AND RETURN BY 1/13/03
PR	01/15/03	251080		SIXTH PAYMENT RECEIVED. SEVENTH PAYMENT DUE 5 FEB. \$1,010.00.
PR	01/27/03	259973		1ST PAYMENT OF FIVE RECEIVED FOR \$1,020
SCOE	01/28/03	259973	OGC# 03-2050 \$5,000.00	FACILITY IS TO MAKE 5 MONTHLY PAYMENTS OF \$1020 TO SATISFY CONSENT ORDER
PR	02/10/03	251080		SEVENTH PAYMENT RECEIVED. EIGHTH PAYMENT DUE 5 MAR.



				1010.00.
PR	02/26/03	259973		2ND PAYMENT RECEIVED OF 5 PAYMENTS DUE
PR	03/11/03	251080		EIGHTH PAYMENT RECEIVED. NINTH PAYMENT DUE 5 APRIL. \$1010.00.
PR	03/24/03	259973		3RD OF 5 PAYMENTS TO SATISFY ENFORCEMENT PENALTY
PR	04/04/03	251080		NINTH PAYMENT RECEIVED. FINAL PAYMENT DUE 5 MAY. \$1010.00.
PR	04/21/03	259973		FOURTH PAYMENT OF FIVE DUE AT \$1020.00 EACH
PR	05/12/03	251080		FINAL PAYMENT RECEIVED. \$1010.00.
PR	05/28/03	259973		FITH AND LAST PAYMENT OF \$1,020
PCL	06/04/03	259973		TOTAL OF 5 PENALTY PAYMENTS MADE FOR A TOTAL OF \$5,100 HAVE BEEN RECEIVED AND CASE CLOSED
CCD	06/04/03	259973		
PCL	06/04/03	251080		
CCD	06/04/03	251080		
CEI	06/24/03	269743		
WLI	11/04/03	269743		
MEET	12/12/03	269743		
SCOE	01/12/04	269743	OGC #03-2676	\$4,975.00
CFFE	01/12/04	269743		
CCD	02/18/04	269743		
PCL	02/18/04	269743		
CEI	03/04/04	276795		COMPLIANCE ACTIVITY RELATED TO USED OIL PROCESSING, USED OIL TRANSPORTER AND SOLID WASTE PROCESSING RULES
CEI	03/04/04	276911		INSPECTION REPORT BEINTG DRAFTED.
EPI	03/04/04	276795		
WLI	07/15/04	276795		
FR	07/15/04	276911		THIS PROJECT COMBINED WITH PROJECT #276795. ENFORCEMENT CASE INITIATED UNDER WARNING LETTER #276795 DATED JULY 15, 2004.
CCD	07/19/04	276911		ENFORCEMENT ACTION PURSUED UNDER PROJECT #276795.
FR	08/06/04	276795		FACILITY CALLED TO STATE IT HAS RETURNED TO COMPLIANCE, THERE IS NO NEED FOR AN ENFORCEMENT MEETING JUST ISSUE SFCO
SCOI	08/11/04	276795		FACILITY IS TO RETURN SIGNED SFCO BY 8/27/04
SCOE	09/10/04	276795	OGC #04-1410	CANNOT CLOSE UNTIL HOWCO PAYS PENALTY IN THREE INSTALLMENTS \$3,725
PR	09/22/04	276795		FIRST OF THREE MONTHLY PAYMENTS
PR	10/12/04	276795		SECOND OF THREE PAYMENTS
PR	11/19/04	276795		THIRD AND LAST PAYMENT FOR THIS PROJECT
FR	11/29/04	75977		
CCD	11/29/04	75977		
PCL	11/30/04	276795		
CCD	11/30/04	276795		
CEI	01/27/05	285070		DRAFTING INSPECTION REPORT / WARNING LETTER
EPI	01/27/05	285070		
FR	03/01/05	285070		IN PROCESS OF DRAFTING WARNING LETTER
WLI	03/11/05	285070		03/28/05 DUE DATE FOR RESPONSE FROM FACILITY TO SCHEDULE ENF MTG
CALL	03/23/05	285070		FACILITY CALLED TO SET UP ENF MTG ON 4/12/05



EMT	04/12/05	285070		FACILITY TO SUBMIT ADDITIONAL INFO TO REFUTE ALLEGED VIOLATIONS BY 4/22/05
LTR	04/13/05	285070		COUNTER OFFER BY FACILITY ON ALLEGATIONS/PENALTIES
SCOI	05/16/05	285070		DRAFT SFCO ISSUED. SUSPENSE DATE FOR REPLY JUNE 3, 2005
CALL	06/03/05	285070		DISCUSSION WITH CLIENTS ATTORNEY ON ALLEGED VIOLATIONS IN CO
LTR	06/06/05	285070		FAXED HOWCO ATTORNEY HISTORIC CEI REPORTS AS REQUESTED ON 6/3/05 PHONE CALL
CALL	06/21/05	285070		NOTIFIED FACILITY OF FINAL SUSPENSE DATE OF 6/23/05 TO RESPOND TO CO ISSUED 5/16/05
LTR	06/21/05	285070		LETTER FROM ATTORNEY RESPONDING TO 6/3/05 PHONE CALL AND ISSUED CO
ACO	07/11/05	285070		SUSPENSE DATE FOR SIGNED CO 7/15/05
COE	07/21/05	285070	OGC # 05-0911 # 1,475.00	8/17/05 SUSPENSE DATE FOR PAYMENT OF PENALTY TO CLOSE CASE
PR	07/25/05	285070		FULL PENALTY PAYMENT RECEIVED
PCL	07/28/05	285070		
CCD	07/28/05	285070		
FR	08/31/05	100547		REVIEW FILE TO ENSURE COMPLIANCE WITH CO OGC # 97-2190
PCL	09/01/05	100547		UPON REVIEWING FILE AND SUBMITTALS THE FACILITY HAS COMPLIED WITH THE ORDER
CFE	09/01/05	100547		
CCD	09/01/05	100547		
CEI	11/07/05	293141		NEED TO RETURN TO FACILITY TO REVIEW RECORDS UNAVAILABLE AT TIME OF INSPECTION
SNY	11/07/05	293141		
EPI	11/07/05	293141		
FOLL	01/05/06	293141		SITE VISIT TO REVIEW RECORDS
FOLL	02/16/06	293141		ON 1ST FOLLOW UP VISIT SOLID WASTE PROCESSING WAS UNACCEPTABLE ON THIS VISIT IT WAS OBSERVED THAT CONDITIONS HAVE NOT IMPROVED
SRVC	04/05/06	293141		FACILITY SUBMITTED DOCUMENTATION AND PICTURES THAT SECONDARY CONTAINMENT HAD BEEN REPAIRED AND RE-SEALED
FOLL	06/01/06	293141		DRFATING CEI REPORT
WLI	07/21/06	293141	PENALTY AUTHORIZATION SENT TO OGC FOR APPROVAL	SUSPENSE DATE TO SCHEDULE ENF. MEETING 8/9/06
CPAM	07/21/06	293141		OGC PENALTY AUTHORIZATION REQUEST SENT FOR APPROVAL PRIOR TO ENF. MEETING
LTR	08/02/06	293141		FACILITY RESPONSE TO WARNING LETTER TO SCHEDULE ENF. MTG. LAST WEEK OF AUGUST 06
LTR	08/21/06	293141		PENALTY COMPUTATION SHEET MAILED TO FACILITY AS PART OF WL #293141

## Violation History

Vio	Area	Regulation	Inits	Determined	Completed	Project	Act	Act Date	Remarks
1	GGR		RHS	4/16/1990	2/19/1993	96098	CEI	4/16/1990	
2	GGR		RHS	4/16/1990	2/19/1993	96098	CEI	4/16/1990	
3			RHS	4/16/1990	2/19/1993	96098	CEI	4/16/1990	



	GGR								
4	GGR		RHS	4/16/1990	2/19/1993	96098	CEI	4/16/1990	
5	TGR		RHS	9/20/1990	2/19/1993	96098	CEI	4/16/1990	
6	TMR		RHS	9/20/1990	2/19/1993	96098	CEI	4/16/1990	
7	GGR		RHS	9/20/1990	2/19/1993	96098	CEI	4/16/1990	
8	GGR		RHS	9/20/1990	2/19/1993	96098	CEI	4/16/1990	
9	GGR		RHS	9/20/1990	2/19/1993	96098	CEI	4/16/1990	
10	GGR		RHS	9/20/1990	2/19/1993	96098	CEI	4/16/1990	
11	GGR		RHS	9/20/1990	2/19/1993	96098	CEI	4/16/1990	
12	GGR		RHS	9/20/1990	2/19/1993	96098	CEI	4/16/1990	
13	GOR		RHS	9/20/1990	2/19/1993	96098	CEI	4/16/1990	
14	GOR		RHS	9/20/1990	2/19/1993	96098	CEI	4/16/1990	
15	GOR		RHS	9/20/1990	2/19/1993	96098	CEI	4/16/1990	
16	DOR	403.727(1)(b)F.S.	OPR	4/5/1993	9/16/1993	96098	CEI	2/19/1993	NOT A VALID PERMIT; T.O.P. EXPIRED.
17	DMC	40 CFR 265.173	OPR	4/5/1993	9/16/1993	96098	CEI	2/19/1993	CONTAINER HOLDING D001 WAS OPEN.
18	DMC	40 CFR 265.174	OPR	4/5/1993	9/16/1993	96098	CEI	2/19/1993	NO INSPECTION OF CONTAINERS DOCUMENTED.
19	DPP	40 CFR 265.15	OPR	4/5/1993	9/16/1993	96098	CEI	2/19/1993	NO INSPECTION FOR PREPAREDNESS DOCUMENTED.
20	GGR	40 CFR 262.11	RHS	4/5/1993	6/16/1999	96098	CEI	2/19/1993	NO ADQUATE HAZ DETERMINATION OF WWTU SLUDGE.
21	DOR	403.413 (4)(c)FS	OPR	4/5/1993	9/16/1993	96098	CEI	2/19/1993	IMPROPER DISPOSAL OF WWTU SLUDGE.
22	DPP	40 CFR 265.16	OPR	4/5/1993	9/16/1993	96098	CEI	2/19/1993	NO TRAINING PROGRAM DOCUMENTED.
23	DCL	40 CFR 265 SUBPART G	OPR	4/5/1993	9/16/1993	96098	CEI	2/19/1993	NO CLOSURE PLAN.
24	DFR	40 CFR 265 SUBPART H	OPR	4/5/1993	9/16/1993	96098	CEI	2/19/1993	NO FINANCIAL RESPONSIBILITY FOR ACCIDENT DOCUMENTED.
25	TGR	17-710.600(4) F.A.C.	OPR	4/5/1993	9/24/1993	96098	CEI	2/19/1993	NO CERTIFICATION NUMBER (USED OIL) ON VEHICLES.
26	GGR	262.11	RHS	5/23/1994	6/16/1999	67934	CEI	3/15/1994	CARBON SAND FILTER USED OIL SOLIDS.
27	GGR	262.11	RHS	4/2/1997	6/16/1999	100547	CEI	10/16/1996	
28	TMR	263.20	RHS	4/2/1997	6/16/1999	100547	CEI	10/16/1996	
29	UPR	279.52(a)	RHS	4/2/1997	6/16/1999	100547	CEI	10/16/1996	
30	UPR	279.52(b)(2)(iii)	RHS	4/2/1997	6/16/1999	100547	CEI	10/16/1996	



31	UPR	279.52(b)(2)(iv)	RHS	4/2/1997	6/16/1999	100547	CEI	10/16/1996	
32	UPR	279.52(b)(3)(ii)	RHS	4/2/1997	6/16/1999	100547	CEI	10/16/1996	
33	UOS	279.54(a)	RHS	4/2/1997	6/16/1999	100547	CEI	10/16/1996	
34	UOS	279.54(c)	RHS	4/2/1997	6/16/1999	100547	CEI	10/16/1996	
35	UOS	279.54(d)	RHS	4/2/1997	6/16/1999	100547	CEI	10/16/1996	
36	UOG	62-710.850(6)(a)	RHS	4/2/1997	6/16/1999	100547	CEI	10/16/1996	
37	GOR	403.413(4)(c)	RHS	4/2/1997	6/16/1999	100547	CEI	10/16/1996	
38	GOR	403.727(3)(b)1.	RHS	4/2/1997	6/16/1999	100547	CEI	10/16/1996	
39	GOR	403.727(3)(b)2.	RHS	4/2/1997	6/16/1999	100547	CEI	10/16/1996	
40	GOR	403.727(3)(b)5.	RHS	4/2/1997	6/16/1999	100547	CEI	10/16/1996	
41	UPR	62-710.800(1), FAC	SCT	6/10/1999	12/3/1999	225256	FR	6/8/1999	FAILURE TO SUBMIT COMPLETE APPLICATION
42	GGR	262.11	RHS	9/29/1998	6/16/1999	100547	CEI	9/29/1998	
43	UOS	279.54(c)	RHS	9/29/1998	6/16/1999	100547	CEI	9/29/1998	
44	UOS	279.54(d)	RHS	9/29/1998	6/16/1999	100547	CEI	9/29/1998	
45	GOR	62-710.800(5)	RHS	9/29/1998	6/16/1999	100547	CEI	9/29/1998	
46	URR	279.44(d)	JMD	9/19/2000	5/4/2001	241880	CEI	9/19/2000	VIOLATION DROPPED
47	UOS	279.54(b)(1)	JMD	9/19/2000	4/19/2001	241880	CEI	9/19/2000	
48	UOS	279.54(f)(1)	JMD	9/19/2000	4/19/2001	241880	CEI	9/19/2000	
49	URP	62-710.510(2)	JMD	9/19/2000	5/4/2001	241880	CEI	9/19/2000	VIOLATION DROPPED
50	UOS	62-710.850(6)(a)	JMD	9/19/2000	4/19/2001	241880	CEI	9/19/2000	
51	GRR	62-737.400(5)(b) (1)	JMD	9/19/2000	4/19/2001	241880	CEI	9/19/2000	
52	UPR	specific Cond II.2	JMD	9/19/2000	4/19/2001	241880	CEI	9/19/2000	VIOLATION DROPPED
53	UOS	specific Cond III.8	JMD	9/19/2000	4/19/2001	241880	CEI	9/19/2000	VIOLATION DROPPED
54	URR	General Cond 14 (c)	JMD	9/19/2000	4/19/2001	241880	CEI	9/19/2000	
55	UGN	279.54(g)	JMD	8/14/2001	1/4/2002	251080	CEI	8/14/2001	UO RELEASE
56	UGN	62-710.500(2)	JMD	8/14/2001	1/4/2002	251080	CEI	8/14/2001	ANNUAL UO REGISTRATION
57	UGN	SPEC COND III.8	JMD	8/14/2001	7/8/2002	251080	CEI	8/14/2001	CLEAN UO IN SECOND. CONTAIN.
58		SPEC COND	JMD	8/14/2001	1/4/2002	251080	CEI	8/14/2001	SAMPLING PROCESS OIL



	UGN	III.8.c.2							
59	UGN	SPEC COND IV.4.f	JMD	8/14/2001	1/4/2002	251080	CEI	8/14/2001	WASTE DETERMINATION
60	UGN	SPEC COND IV.12.A	JMD	8/14/2001	7/8/2002	251080	CEI	8/14/2001	ANNUAL CLOSURE ESTIMATE
61	UOS	62-710.850(6)(a)	AFG	7/24/2002	7/24/2002	259973	CEI	7/24/2002	
62	UOS	Sp. Cond. III.8	AFG	7/24/2002	7/24/2002	259973	CEI	7/24/2002	
63	DOR	Sp. Cond. IV.7(c)	AFG	7/24/2002	7/24/2002	259973	CEI	7/24/2002	FAILURE TO MANAGE SOLID WASTE IN CONTAINERS/TANKS
64	UGN	Sp. Cond. V.2(a)	AFG	7/24/2002	7/24/2002	259973	CEI	7/24/2002	
65	UPR	62-710.850(6)(a)	AFG	6/24/2003	6/25/2003	269743	CEI	6/24/2003	FAILURE TO STORE UOF IN ABOVEGROUND CONTAINERS
66	UPR	62-710.850(6)(a)	AFG	6/24/2003	6/25/2003	269743	CEI	6/24/2003	FAILURE TO SEAL CONTAINERS OF UOF
67	UPR	40CFR279.52(a)(3)	AFG	6/24/2003	7/11/2003	269743	CEI	6/24/2003	FAILURE TO PROVIDE EMER. EQUIP.
68	UPR	62-710.850(6)(a)	AFG	6/24/2003	6/25/2003	269743	CEI	6/24/2003	FAILURE TO LABEL CONTAINERS OF UOF
69	UOG	62-710.850(6)(a)	JMD	3/4/2004	8/11/2004	276795	CEI	3/4/2004	FILTER CONTAINER LABELING
70	UPR	62-710.500	JMD	3/4/2004	8/11/2004	276795	CEI	3/4/2004	FAILURE TO SUBMIT ANNUAL REPORT BY MARCH 1
71	GGR	62-730.150(5)	JMD	3/4/2004	8/11/2004	276795	CEI	3/4/2004	FAILURE TO NOTIFY OF CHANGE IN GENERATOR STATUS
72	UOG	Specific Condition IV.4.d	JMD	3/4/2004	8/11/2004	276795	CEI	3/4/2004	FAILURE TO PROPERLY LABEL SCREEN FILTER RESIDUE
73	UOG	Specific Condition IV.6.b	JMD	3/4/2004	8/11/2004	276795	CEI	3/4/2004	FAILURE TO LINE, COVER AND LABEL SOLID WASTE
74	UPR	62-710.850(6)(a),FAC	AFG	1/27/2005	1/31/2005	285070	CEI	1/27/2005	2 CITATIONS ON UOF CONTAINERS
75	UPR	62-710.850(6)(b),FAC	JMD	1/27/2005	7/21/2005	285070	CEI	1/27/2005	WASTE OIL ON GROUND
76	UPR	S.C. IV.4.d	JMD	1/27/2005	7/21/2005	285070	CEI	1/27/2005	NOT LABELING CONTAINER
78	UPR	279.52(a)(3)	AFG	11/7/2005		293141	CEI	11/7/2005	FAIL TO MAINTAIN EMERGENCY COMMUNICATION SYSTEM
79	UPR	279.52(b)(4)(v)	AFG	11/7/2005		293141	CEI	11/7/2005	FAILURE TO AMEND CONTINGENCY PLAN
80	UPR	279.54	AFG	11/7/2005		293141	CEI	11/7/2005	FAILURE TO ADEQUATELY TRAIN PERSONNEL
81	UOS	62-710.401(6)	AFG	11/7/2005		293141	CEI	11/7/2005	FAILURE TO SEAL UO CONTAINER OR PROTECT FROM WEATHER
82	UOS	62.710.401(6)	AFG	11/7/2005		293141	CEI	11/7/2005	FAILURE TO PROPERLY LABEL DRUMS OF USED OIL
83	UOS	62.710.401(6)	AFG	11/7/2005		293141	CEI	11/7/2005	FAILURE TO PROVIDE SECONDARY CONTAINMENT FOR DRUMS OF USED OIL
84	UOS	62-710.850(5)(a)	AFG	11/7/2005		293141	CEI	11/7/2005	FAILURE TO STORE UOF IN SEALED CONTAINERS
85	UOS	62-710.850(5)(a)	AFG	11/7/2005		293141	CEI	11/7/2005	FAILURE TO PROPERLY LABEL UOF CONTAINERS
86		62-710.850(5)(a)	AFG	11/7/2005		293141	CEI	11/7/2005	FAILURE TO STORE DRUMS OF UOF



	UOS								ON AN IMPERVIOUS SURFACE
87	UOA	Specific Condition II.8	AFG	11/7/2005		293141	CEI	11/7/2005	FAILURE TO FOLLOW REQUIRED SAMPLING PROTOCOL
88	UOA	Specific Condition II.8(c)(2)	AFG	11/7/2005		293141	CEI	11/7/2005	FAILURE TO PERFORM REQUIRED ANALYSES
89	UPR	Specific Condition IV.1(b)	AFG	11/7/2005		293141	CEI	11/7/2005	ACCEPTING UNPERMITTED MATERIALS FOR STORAGE
90	UPR	Specific Condition IV.3(b)	AFG	11/7/2005		293141	CEI	11/7/2005	FAILURE TO REPAIR OR REPLACE PROC. EQUIPMENT
91	USS	Specific Condition IV.5(c)	AFG	11/7/2005		293141	CEI	11/7/2005	FAILURE TO SAMPLE AND ANALYZE TO MEET DISPOSAL FACILITY CRITERIA
92	UOS	Specific Condition IV.6(b)	AFG	11/7/2005		293141	CEI	11/7/2005	FAILURE TO PROVIDE AN IMPERVIOUS SURFACE FOR STORAGE AND PROCESSING
93	UOS	Specific Condition IV.6(b)	AFG	11/7/2005		293141	CEI	11/7/2005	FAILURE TO STORE PROCESSED SOLIDS IN A COVERED CONTAINER
94	UPR	Specific Condition IV.7(d)	AFG	11/7/2005		293141	CEI	11/7/2005	FAILURE TO PROPERLY LABEL CONTAINERS OF PROCESSED SOLIDS
95	URR	Specific Condition IV.9	AFG	11/7/2005		293141	CEI	11/7/2005	FAILURE TO MAINTAIN REQUIRED RECORDS OF WASTE STREAMS

## OGC Case History

A CRO Activity was detected -- LCT (in DOPPLER) is being queried to provide a Case History for Projects listed above.

*Due to the large amount of data in LCT this report is slow-- If you do not wish to see this data press the Stop Button*

Project	OGC Number	Attorney	Case Opened	Case Closed	Act Code	Activity	Date Done
33721	911176	ALIKA A MONCRIEF	5/31/1991	2/25/2006	COD	CASE OPENED IN DISTRICT	4/12/1990
33721	911176	ALIKA A MONCRIEF	5/31/1991	2/25/2006	NOV1	DRAFT NOTICE OF VIOLATION RECEIVED FROM DISTRICT	5/30/1991
33721	911176	ALIKA A MONCRIEF	5/31/1991	2/25/2006	AA	ASSIGNED TO LEAD ATTORNEY DAVIS, HEIDI	5/31/1991
33721	911176	ALIKA A MONCRIEF	5/31/1991	2/25/2006	ACO	ADMIN. CASE OPENED IN OGC	5/31/1991
33721	911176	ALIKA A MONCRIEF	5/31/1991	2/25/2006		CASE OPENED AND ASSIGNED TO DAVID SCHWARTZ.	5/31/1991
33721	911176	ALIKA A MONCRIEF	5/31/1991	2/25/2006	NOV2	DRAFT NOTICE OF VIOLATION RETURNED TO DISTRICT	7/9/1991
33721	911176	ALIKA A MONCRIEF	5/31/1991	2/25/2006		NOV SENT TO DIST WITH DAVID SCHWARTZ REVIEW	7/9/1991
33721	911176	ALIKA A MONCRIEF	5/31/1991	2/25/2006	NOV3	NOTICE OF VIOLATION ISSUED	8/6/1991
33721	911176	ALIKA A MONCRIEF	5/31/1991	2/25/2006		\$500/EXPENSE.	8/6/1991
33721	911176	ALIKA A MONCRIEF	5/31/1991	2/25/2006	CO2	DRAFT CONSENT ORDER RETURNED TO DISTRICT	1/22/1992
33721	911176	ALIKA A MONCRIEF	5/31/1991	2/25/2006	CO3	CONSENT ORDER FILED	6/19/1992
33721	911176	ALIKA A MONCRIEF	5/31/1991	2/25/2006	MAP	MONIES ASSESSED - PENALTIES	6/19/1992
33721	911176	ALIKA A MONCRIEF	5/31/1991	2/25/2006		EQUAL MONTHLY INSTALLMENTS OF \$833.33 EACH ON THE 1ST OF	6/19/1992
33721	911176	ALIKA A MONCRIEF	5/31/1991	2/25/2006		THE MONTH FOLLOWING RECEIPT OF THIS C.O.	6/19/1992
33721	911176	ALIKA A MONCRIEF	5/31/1991	2/25/2006		CONSENT ORDER FILED. \$10,000/PENALT ASS'D. TO BE PAID IN 12	6/19/1992
33721	911176	ALIKA A MONCRIEF	5/31/1991	2/25/2006		REASSIGNED TO HEIDI DAVIS.	7/1/1992



33721	911176	ALIKA A MONCRIEF	5/31/1991	2/25/2006	\$PPA	\$833.33 PEN/PRF DUE - \$833.33 PAID 29-JUL-1992	8/1/1992
33721	911176	ALIKA A MONCRIEF	5/31/1991	2/25/2006	\$PPA	\$833.33 PEN/PRF DUE - \$833.33 PAID 04-SEP-1992	9/1/1992
33721	911176	ALIKA A MONCRIEF	5/31/1991	2/25/2006	\$PPA	\$833.33 PEN/PRF DUE - \$833.33 PAID 24-SEP-1992	10/1/1992
33721	911176	ALIKA A MONCRIEF	5/31/1991	2/25/2006	\$PPA	\$833.33 PEN/PRF DUE - \$833.33 PAID 27-OCT-1992	11/1/1992
33721	911176	ALIKA A MONCRIEF	5/31/1991	2/25/2006	\$PPA	\$833.33 PEN/PRF DUE - \$833.33 PAID 23-NOV-1992	12/1/1992
33721	911176	ALIKA A MONCRIEF	5/31/1991	2/25/2006	\$PPA	\$833.33 PEN/PRF DUE - \$833.33 PAID 28-DEC-1992	1/1/1993
33721	911176	ALIKA A MONCRIEF	5/31/1991	2/25/2006	\$PPA	\$833.33 PEN/PRF DUE - \$833.33 PAID 27-JAN-1993	2/1/1993
33721	911176	ALIKA A MONCRIEF	5/31/1991	2/25/2006	\$PPA	\$833.33 PEN/PRF DUE - \$833.33 PAID 25-FEB-1993	3/1/1993
33721	911176	ALIKA A MONCRIEF	5/31/1991	2/25/2006	\$PPA	\$833.33 PEN/PRF DUE - \$833.33 PAID 29-MAR-1993	4/1/1993
33721	911176	ALIKA A MONCRIEF	5/31/1991	2/25/2006	\$PPA	\$833.33 PEN/PRF DUE - \$833.33 PAID 26-APR-1993	5/1/1993
33721	911176	ALIKA A MONCRIEF	5/31/1991	2/25/2006	\$PPA	\$833.33 PEN/PRF DUE - \$833.33 PAID 25-MAY-1993	6/1/1993
33721	911176	ALIKA A MONCRIEF	5/31/1991	2/25/2006	\$PPA	\$833.33 PEN/PRTF DUE - \$833.33 PAID 30-JUN-1992	7/1/1993
33721	911176	ALIKA A MONCRIEF	5/31/1991	2/25/2006	CAP	CONTAMINATION ASSESSMENT PLAN	11/4/1993
33721	911176	ALIKA A MONCRIEF	5/31/1991	2/25/2006	CAP	CONTAMINATION ASSESSMENT PLAN	12/20/1993
33721	911176	ALIKA A MONCRIEF	5/31/1991	2/25/2006	QAPP	QUALITY ASSURANCE PROJECT PLAN	3/10/1994
33721	911176	ALIKA A MONCRIEF	5/31/1991	2/25/2006	QAPP	QUALITY ASSURANCE PROJECT PLAN	5/25/1994
33721	911176	ALIKA A MONCRIEF	5/31/1991	2/25/2006	QAPP	QUALITY ASSURANCE PROJECT PLAN	7/8/1994
33721	911176	ALIKA A MONCRIEF	5/31/1991	2/25/2006	\$PEA	\$.04 PEN/ECOSYS DUE - \$.04 PAID 13-SEP-1999	8/1/1994
33721	911176	ALIKA A MONCRIEF	5/31/1991	2/25/2006	COND	PERMIT CONDITION OR CONSENT ORDER/RESPONSE DUE	9/1/1994
33721	911176	ALIKA A MONCRIEF	5/31/1991	2/25/2006	CAP	CONTAMINATION ASSESSMENT PLAN	10/4/1994
33721	911176	ALIKA A MONCRIEF	5/31/1991	2/25/2006	CAP	CONTAMINATION ASSESSMENT PLAN	11/3/1994
33721	911176	ALIKA A MONCRIEF	5/31/1991	2/25/2006	CAP	CONTAMINATION ASSESSMENT PLAN	12/1/1994
33721	911176	ALIKA A MONCRIEF	5/31/1991	2/25/2006	CAP	CONTAMINATION ASSESSMENT PLAN	12/28/1994
33721	911176	ALIKA A MONCRIEF	5/31/1991	2/25/2006	CAP	CONTAMINATION ASSESSMENT PLAN	2/2/1995
33721	911176	ALIKA A MONCRIEF	5/31/1991	2/25/2006	CAP	CONTAMINATION ASSESSMENT PLAN	3/3/1995
33721	911176	ALIKA A MONCRIEF	5/31/1991	2/25/2006	CAP	CONTAMINATION ASSESSMENT PLAN	4/5/1995
33721	911176	ALIKA A MONCRIEF	5/31/1991	2/25/2006	COND	PERMIT CONDITION OR CONSENT ORDER/RESPONSE DUE	4/14/1995
33721	911176	ALIKA A MONCRIEF	5/31/1991	2/25/2006	COND	PERMIT CONDITION OR CONSENT ORDER/RESPONSE DUE	5/4/1995
33721	911176	ALIKA A MONCRIEF	5/31/1991	2/25/2006	AR	RE-ASSIGNED TO LEAD ATTORNEY KTB	5/17/1995 11:44:28 AM
33721	911176	ALIKA A MONCRIEF	5/31/1991	2/25/2006	COND	PERMIT CONDITION OR CONSENT ORDER/RESPONSE DUE	6/6/1995
33721	911176	ALIKA A MONCRIEF	5/31/1991	2/25/2006	COND	PERMIT CONDITION OR CONSENT ORDER/RESPONSE DUE	7/3/1995
33721	911176	ALIKA A MONCRIEF	5/31/1991	2/25/2006	COND	PERMIT CONDITION OR CONSENT ORDER/RESPONSE DUE	7/7/1995
33721	911176	ALIKA A MONCRIEF	5/31/1991	2/25/2006	COND	PERMIT CONDITION OR CONSENT ORDER/RESPONSE DUE	8/4/1995
33721	911176	ALIKA A MONCRIEF	5/31/1991	2/25/2006	CAP	CONTAMINATION ASSESSMENT PLAN	8/24/1995
33721	911176	ALIKA A MONCRIEF	5/31/1991	2/25/2006	COND	PERMIT CONDITION OR CONSENT ORDER/RESPONSE DUE	9/5/1995



33721	911176	ALIKI A MONCRIEF	5/31/1991	2/25/2006	COND	PERMIT CONDITION OR CONSENT ORDER/RESPONSE DUE	10/10/1995
33721	911176	ALIKI A MONCRIEF	5/31/1991	2/25/2006	AR	RE-ASSIGNED TO LEAD ATTORNEY LER	11/1/1995 1:54:36 PM
33721	911176	ALIKI A MONCRIEF	5/31/1991	2/25/2006	AR	RE-ASSIGNED TO LEAD ATTORNEY AEF	11/1/1995 1:56:02 PM
33721	911176	ALIKI A MONCRIEF	5/31/1991	2/25/2006	COND	PERMIT CONDITION OR CONSENT ORDER/RESPONSE DUE	11/7/1995
33721	911176	ALIKI A MONCRIEF	5/31/1991	2/25/2006	COND	PERMIT CONDITION OR CONSENT ORDER/RESPONSE DUE	12/4/1995
33721	911176	ALIKI A MONCRIEF	5/31/1991	2/25/2006	COND	PERMIT CONDITION OR CONSENT ORDER/RESPONSE DUE	12/29/1995
33721	911176	ALIKI A MONCRIEF	5/31/1991	2/25/2006	CALL	TELEPHONE CONVERSATION	2/1/1996
33721	911176	ALIKI A MONCRIEF	5/31/1991	2/25/2006	COND	PERMIT CONDITION OR CONSENT ORDER/RESPONSE DUE	2/1/1996
33721	911176	ALIKI A MONCRIEF	5/31/1991	2/25/2006	COND	PERMIT CONDITION OR CONSENT ORDER/RESPONSE DUE	3/4/1996
33721	911176	ALIKI A MONCRIEF	5/31/1991	2/25/2006	COND	PERMIT CONDITION OR CONSENT ORDER/RESPONSE DUE	4/4/1996
33721	911176	ALIKI A MONCRIEF	5/31/1991	2/25/2006	COND	PERMIT CONDITION OR CONSENT ORDER/RESPONSE DUE	5/3/1996
33721	911176	ALIKI A MONCRIEF	5/31/1991	2/25/2006	COND	PERMIT CONDITION OR CONSENT ORDER/RESPONSE DUE	6/1/1996
33721	911176	ALIKI A MONCRIEF	5/31/1991	2/25/2006	CAR	CONTAMINATION ASSESSMENT REPORT	6/6/1996
33721	911176	ALIKI A MONCRIEF	5/31/1991	2/25/2006	COND	PERMIT CONDITION OR CONSENT ORDER/RESPONSE DUE	7/5/1996
33721	911176	ALIKI A MONCRIEF	5/31/1991	2/25/2006	COND	PERMIT CONDITION OR CONSENT ORDER/RESPONSE DUE	8/5/1996
33721	911176	ALIKI A MONCRIEF	5/31/1991	2/25/2006	CAR	CONTAMINATION ASSESSMENT REPORT	8/12/1996
33721	911176	ALIKI A MONCRIEF	5/31/1991	2/25/2006	COND	PERMIT CONDITION OR CONSENT ORDER/RESPONSE DUE	9/6/1996
33721	911176	ALIKI A MONCRIEF	5/31/1991	2/25/2006	AR	RE-ASSIGNED TO LEAD ATTORNEY DAVID C SCHWARTZ	9/12/1996 12:24:16 PM
33721	911176	ALIKI A MONCRIEF	5/31/1991	2/25/2006	CCD	CASE CLOSED IN DISTRICT	10/6/1996
33721	911176	ALIKI A MONCRIEF	5/31/1991	2/25/2006		CHECK DATED 6/30/92 HAD NEVER BEEN POSTED TO LCT.	1/13/1997
33721	911176	ALIKI A MONCRIEF	5/31/1991	2/25/2006		FINAL PAYMENT OF \$833.33 POSTED AS OF THIS DATE. THIS	1/13/1997
33721	911176	ALIKI A MONCRIEF	5/31/1991	2/25/2006		HOWEVER, IT IS NOW BEING SHOWN AS THE LAST. EFFORTS ARE	1/13/1997
33721	911176	ALIKI A MONCRIEF	5/31/1991	2/25/2006		NOT BEING MADE TO COLLECT THE \$0.04 STILL SHOWN AS DUE.	1/13/1997
33721	911176	ALIKI A MONCRIEF	5/31/1991	2/25/2006		THIS CHECK SHOULD HAVE BEEN SHOWN AS THE FIRST PAYMENT	1/13/1997
100547	972190	ALIKI A MONCRIEF	12/22/1997	9/19/2005	CEI	COMPLIANCE EVALUATION INSPECTION	4/2/1997
100547	972190	ALIKI A MONCRIEF	12/22/1997	9/19/2005	SNY	SIGNIFICANT NON-COMPLIER - YES	4/2/1997
33721	911176	ALIKI A MONCRIEF	5/31/1991	2/25/2006		CASE SENT TO F&A FOR REFERRAL TO COMPTROLLER FOR WRITEOFF	4/9/1997
100547	972190	ALIKI A MONCRIEF	12/22/1997	9/19/2005	CPAM	CIVIL PENALTY AUTHORIZATION MEMO	4/17/1997
100547	972190	ALIKI A MONCRIEF	12/22/1997	9/19/2005	WLI	WARNING LETTER ISSUED	5/2/1997
33721	911176	ALIKI A MONCRIEF	5/31/1991	2/25/2006		BALANCE OF \$.04 CHANGED TO UNCOLLECTIBLE PER REQUEST FROM	8/8/1997
33721	911176	ALIKI A MONCRIEF	5/31/1991	2/25/2006		F&A AND APPROVAL OF L. MORGAN.	8/8/1997
100547	972190	ALIKI A MONCRIEF	12/22/1997	9/19/2005	EMT	ENFORCEMENT MEETING	9/8/1997
100547	972190	ALIKI A MONCRIEF	12/22/1997	9/19/2005	LTR	LETTER	9/16/1997
100547	972190	ALIKI A MONCRIEF	12/22/1997	9/19/2005	LTR	LETTER	11/14/1997
		ALIKI A					



100547	972190	MONCRIEF	12/22/1997	9/19/2005	AA	ASSIGNED TO LEAD ATTORNEY AL E FORD	12/22/1997
100547	972190	ALI KI A MONCRIEF	12/22/1997	9/19/2005	ACO	ADMIN. CASE OPENED IN OGC	12/22/1997
100547	972190	ALI KI A MONCRIEF	12/22/1997	9/19/2005	CO1	DRAFT CONSENT ORDER RECEIVED FROM DISTRICT	12/22/1997
100547	972190	ALI KI A MONCRIEF	12/22/1997	9/19/2005	AR	RE-ASSIGNED TO LEAD ATTORNEY AGUSTA P POSNER	12/22/1997 9:54:58 AM
33721	911176	ALI KI A MONCRIEF	5/31/1991	2/25/2006	AR	RE-ASSIGNED TO LEAD ATTORNEY AGUSTA P POSNER	12/22/1997 9:55:06 AM
100547	972190	ALI KI A MONCRIEF	12/22/1997	9/19/2005	LTR	LETTER	2/6/1998
100547	972190	ALI KI A MONCRIEF	12/22/1997	9/19/2005	CO2	DRAFT CONSENT ORDER RETURNED TO DISTRICT	2/23/1998
100547	972190	ALI KI A MONCRIEF	12/22/1997	9/19/2005	LTR	LETTER	3/6/1998
100547	972190	ALI KI A MONCRIEF	12/22/1997	9/19/2005	DCOI	DRAFT CONSENT ORDER ISSUED	3/11/1998
100547	972190	ALI KI A MONCRIEF	12/22/1997	9/19/2005	CALL	TELEPHONE CONVERSATION	9/14/1998
100547	972190	ALI KI A MONCRIEF	12/22/1997	9/19/2005	DCOI	DRAFT CONSENT ORDER ISSUED	2/5/1999
100547	972190	ALI KI A MONCRIEF	12/22/1997	9/19/2005	DCOI	DRAFT CONSENT ORDER ISSUED	6/10/1999
100547	972190	ALI KI A MONCRIEF	12/22/1997	9/19/2005	CO3	CONSENT ORDER FILED	6/16/1999
100547	972190	ALI KI A MONCRIEF	12/22/1997	9/19/2005	COE	CONSENT ORDER EXECUTED	6/16/1999
100547	972190	ALI KI A MONCRIEF	12/22/1997	9/19/2005	MAE	MONIES ASSESSED - EXPENSES	6/16/1999
100547	972190	ALI KI A MONCRIEF	12/22/1997	9/19/2005	MAP	MONIES ASSESSED - PENALTIES	6/16/1999
100547	972190	ALI KI A MONCRIEF	12/22/1997	9/19/2005	SNN	SIGNIFICANT NON-COMPLIER - NO	6/16/1999
100547	972190	ALI KI A MONCRIEF	12/22/1997	9/19/2005	CEI	COMPLIANCE EVALUATION INSPECTION	6/24/1999
100547	972190	ALI KI A MONCRIEF	12/22/1997	9/19/2005	COND	PERMIT CONDITION OR CONSENT ORDER/RESPONSE DUE	7/6/1999
100547	972190	ALI KI A MONCRIEF	12/22/1997	9/19/2005	\$EEA	\$500.00 EXP/ECOSYS DUE - \$500.00 PAID 07-JUL- 2000	7/16/1999
100547	972190	ALI KI A MONCRIEF	12/22/1997	9/19/2005	\$PEA	\$1,762.50 PEN/ECOSYS DUE - \$1,762.50 PAID 14- JUL-1999	7/16/1999
100547	972190	ALI KI A MONCRIEF	12/22/1997	9/19/2005	COND	PERMIT CONDITION OR CONSENT ORDER/RESPONSE DUE	7/19/1999
100547	972190	ALI KI A MONCRIEF	12/22/1997	9/19/2005	COND	PERMIT CONDITION OR CONSENT ORDER/RESPONSE DUE	7/21/1999
100547	972190	ALI KI A MONCRIEF	12/22/1997	9/19/2005	COND	PERMIT CONDITION OR CONSENT ORDER/RESPONSE DUE	8/24/1999
100547	972190	ALI KI A MONCRIEF	12/22/1997	9/19/2005	COND	PERMIT CONDITION OR CONSENT ORDER/RESPONSE DUE	8/25/1999
100547	972190	ALI KI A MONCRIEF	12/22/1997	9/19/2005	\$PEA	\$1,762.50 PEN/ECOSYS DUE - \$1,762.50 PAID 02- SEP-1999	8/30/1999
100547	972190	ALI KI A MONCRIEF	12/22/1997	9/19/2005	COND	PERMIT CONDITION OR CONSENT ORDER/RESPONSE DUE	9/16/1999
100547	972190	ALI KI A MONCRIEF	12/22/1997	9/19/2005	COND	PERMIT CONDITION OR CONSENT ORDER/RESPONSE DUE	9/24/1999
100547	972190	ALI KI A MONCRIEF	12/22/1997	9/19/2005	\$PEA	\$5,000.00 PEN/ECOSYS DUE - \$5,000.00 PAID 24- SEP-1999	9/30/1999
100547	972190	ALI KI A MONCRIEF	12/22/1997	9/19/2005	COND	PERMIT CONDITION OR CONSENT ORDER/RESPONSE DUE	10/11/1999
100547	972190	ALI KI A MONCRIEF	12/22/1997	9/19/2005	COND	PERMIT CONDITION OR CONSENT ORDER/RESPONSE DUE	10/29/1999
100547	972190	ALI KI A MONCRIEF	12/22/1997	9/19/2005	\$PEA	\$1,762.50 PEN/ECOSYS DUE - \$1,762.50 PAID 30- SEP-1999	10/31/1999
100547	972190	ALI KI A MONCRIEF	12/22/1997	9/19/2005	COND	PERMIT CONDITION OR CONSENT ORDER/RESPONSE DUE	11/29/1999
100547	972190	ALI KI A MONCRIEF	12/22/1997	9/19/2005	\$PEA	\$1,762.50 PEN/ECOSYS DUE - \$1,762.50 PAID 08- NOV-1999	11/30/1999
100547	972190	ALI KI A MONCRIEF	12/22/1997	9/19/2005	COND	PERMIT CONDITION OR CONSENT ORDER/RESPONSE DUE	11/30/1999



100547	972190	ALIKI A MONCRIEF	12/22/1997	9/19/2005	COND	PERMIT CONDITION OR CONSENT ORDER/RESPONSE DUE	12/10/1999
100547	972190	ALIKI A MONCRIEF	12/22/1997	9/19/2005	\$PEA	\$1,762.50 PEN/ECOSYS DUE - \$1,762.50 PAID 01-DEC-1999	12/31/1999
100547	972190	ALIKI A MONCRIEF	12/22/1997	9/19/2005	COND	PERMIT CONDITION OR CONSENT ORDER/RESPONSE DUE	1/19/2000
100547	972190	ALIKI A MONCRIEF	12/22/1997	9/19/2005	LTR	LETTER	1/19/2000
100547	972190	ALIKI A MONCRIEF	12/22/1997	9/19/2005	MEMO	INTERDEPARTMENTAL MEMO	1/19/2000
100547	972190	ALIKI A MONCRIEF	12/22/1997	9/19/2005	LTR	LETTER	1/28/2000
100547	972190	ALIKI A MONCRIEF	12/22/1997	9/19/2005	\$PEA	\$1,762.50 PEN/ECOSYS DUE - \$1,762.50 PAID 29-DEC-1999	1/31/2000
100547	972190	ALIKI A MONCRIEF	12/22/1997	9/19/2005		COPY MADE FOR AGENCY CLERK	2/22/2000
100547	972190	ALIKI A MONCRIEF	12/22/1997	9/19/2005		EXECUTED CO3 RECEIVED IN OGC AND ENTERED INTO LCT BY A.LEE	2/22/2000
100547	972190	ALIKI A MONCRIEF	12/22/1997	9/19/2005	\$PEA	\$1,762.50 PEN/ECOSYS DUE - \$1,762.50 PAID 03-FEB-2000	2/29/2000
100547	972190	ALIKI A MONCRIEF	12/22/1997	9/19/2005	\$PEA	\$1,762.50 PEN/ECOSYS DUE - \$1,762.50 PAID 09-MAR-2000	3/31/2000
100547	972190	ALIKI A MONCRIEF	12/22/1997	9/19/2005		\$5000.00 POLLUTION PREVENTION CREDIT REMOVED AS SEPARATE	4/17/2000
100547	972190	ALIKI A MONCRIEF	12/22/1997	9/19/2005		ASSESSMENT AND ADDED TO PENALTY ASSESSMENT. RESPONDENT	4/17/2000
100547	972190	ALIKI A MONCRIEF	12/22/1997	9/19/2005		DID NOT IMPLEMENT PROJECT.	4/17/2000
100547	972190	ALIKI A MONCRIEF	12/22/1997	9/19/2005	\$PEA	\$1,762.50 PEN/ECOSYS DUE - \$1,762.50 PAID 05-APR-2000	4/30/2000
100547	972190	ALIKI A MONCRIEF	12/22/1997	9/19/2005	\$PEA	\$1,762.50 PEN/ECOSYS DUE - \$1,762.50 PAID 08-MAY-2000	5/31/2000
100547	972190	ALIKI A MONCRIEF	12/22/1997	9/19/2005	\$PEA	\$1,762.50 PEN/ECOSYS DUE - \$1,762.50 PAID 15-JUN-2000	6/30/2000
100547	972190	ALIKI A MONCRIEF	12/22/1997	9/19/2005	\$PEA	\$1,262.50 PEN/ECOSYS DUE - \$1,262.50 PAID 07-JUL-2000	7/31/2000
33721	911176	ALIKI A MONCRIEF	5/31/1991	2/25/2006	AR	RE-ASSIGNED TO LEAD ATTORNEY ANGELA C DEMPSEY	8/17/2000 2:29:02 PM
100547	972190	ALIKI A MONCRIEF	12/22/1997	9/19/2005	AR	RE-ASSIGNED TO LEAD ATTORNEY ANGELA C DEMPSEY	8/17/2000 2:29:06 PM
241880	011496	ANGELA C DEMPSEY	9/12/2001	5/25/2002	CEI	COMPLIANCE EVALUATION INSPECTION	9/19/2000
241880	011496	ANGELA C DEMPSEY	9/12/2001	5/25/2002	EPI	ENFORCEMENT PROJECT INITIATED	3/20/2001
241880	011496	ANGELA C DEMPSEY	9/12/2001	5/25/2002	SNY	SIGNIFICANT NON-COMPLIER - YES	3/21/2001
241880	011496	ANGELA C DEMPSEY	9/12/2001	5/25/2002	WLI	WARNING LETTER ISSUED	3/21/2001
241880	011496	ANGELA C DEMPSEY	9/12/2001	5/25/2002	EMT	ENFORCEMENT MEETING	4/19/2001
241880	011496	ANGELA C DEMPSEY	9/12/2001	5/25/2002	MEET	MEETING	4/20/2001
241880	011496	ANGELA C DEMPSEY	9/12/2001	5/25/2002	LTR	LETTER	4/23/2001
241880	011496	ANGELA C DEMPSEY	9/12/2001	5/25/2002	SRVC	SUBMITTAL RECEIVED BY DEPARTMENT	5/4/2001
241880	011496	ANGELA C DEMPSEY	9/12/2001	5/25/2002	MEET	MEETING	5/8/2001
241880	011496	ANGELA C DEMPSEY	9/12/2001	5/25/2002	LTR	LETTER	5/18/2001
241880	011496	ANGELA C DEMPSEY	9/12/2001	5/25/2002	SRVC	SUBMITTAL RECEIVED BY DEPARTMENT	5/29/2001
241880	011496	ANGELA C DEMPSEY	9/12/2001	5/25/2002	CRO	CASE REFERRED TO OGC	8/31/2001
241880	011496	ANGELA C DEMPSEY	9/12/2001	5/25/2002	AA	ASSIGNED TO LEAD ATTORNEY ANGELA C DEMPSEY	9/12/2001
241880	011496	ANGELA C DEMPSEY	9/12/2001	5/25/2002	CCO	CIVIL CASE OPENED IN OGC	9/12/2001
241880	011496	ANGELA C	9/12/2001	5/25/2002	CRR	CASE REPORT RECEIVED	9/12/2001



		DEMPSEY					
241880	011496	ANGELA C DEMPSEY	9/12/2001	5/25/2002	CRMS	CASE REPORT AUTHORIZATION MEMO SENT	10/4/2001
241880	011496	ANGELA C DEMPSEY	9/12/2001	5/25/2002	EMT	ENFORCEMENT MEETING	10/5/2001
241880	011496	ANGELA C DEMPSEY	9/12/2001	5/25/2002	SCOI	SHORT FORM CONSENT ORDER ISSUED	10/10/2001
241880	011496	ANGELA C DEMPSEY	9/12/2001	5/25/2002		AUTHORIZATION TO SUE APPROVED	10/11/2001
241880	011496	ANGELA C DEMPSEY	9/12/2001	5/25/2002	CFFE	RETURN TO COMPLIANCE FROM FORMAL ENFORCEMENT	10/26/2001
241880	011496	ANGELA C DEMPSEY	9/12/2001	5/25/2002	MAE	MONIES ASSESSED - EXPENSES	10/26/2001
241880	011496	ANGELA C DEMPSEY	9/12/2001	5/25/2002	MAP	MONIES ASSESSED - PENALTIES	10/26/2001
241880	011496	ANGELA C DEMPSEY	9/12/2001	5/25/2002	SCOE	SHORT FORM CONSENT ORDER EXECUTED	10/26/2001
241880	011496	ANGELA C DEMPSEY	9/12/2001	5/25/2002	SFCO	SHORT-FORM CONSENT ORDER FILED	10/26/2001
241880	011496	ANGELA C DEMPSEY	9/12/2001	5/25/2002	SNN	SIGNIFICANT NON-COMPLIER - NO	10/26/2001
241880	011496	ANGELA C DEMPSEY	9/12/2001	5/25/2002		COPY MADE FOR AGENCY CLERK	11/14/2001
241880	011496	ANGELA C DEMPSEY	9/12/2001	5/25/2002	COND	PERMIT CONDITION OR CONSENT ORDER/RESPONSE DUE	12/14/2001
241880	011496	ANGELA C DEMPSEY	9/12/2001	5/25/2002	\$EEC	\$100.00 EXP/ECOSYS DUE - \$100.00 PAID 21-DEC- 2001	1/26/2002
241880	011496	ANGELA C DEMPSEY	9/12/2001	5/25/2002	\$PEC	\$1,000.00 PEN/ECOSYS DUE - \$1,000.00 PAID 21- DEC-2001	1/26/2002
241880	011496	ANGELA C DEMPSEY	9/12/2001	5/25/2002	COND	PERMIT CONDITION OR CONSENT ORDER/RESPONSE DUE	2/4/2002
241880	011496	ANGELA C DEMPSEY	9/12/2001	5/25/2002	\$PEC	\$1,000.00 PEN/ECOSYS DUE - \$1,000.00 PAID 13- FEB-2002	2/26/2002
241880	011496	ANGELA C DEMPSEY	9/12/2001	5/25/2002	\$PEC	\$1,000.00 PEN/ECOSYS DUE - \$1,000.00 PAID 29- APR-2002	3/26/2002
241880	011496	ANGELA C DEMPSEY	9/12/2001	5/25/2002	COND	PERMIT CONDITION OR CONSENT ORDER/RESPONSE DUE	4/18/2002
241880	011496	ANGELA C DEMPSEY	9/12/2001	5/25/2002	\$PEC	\$1,000.00 PEN/ECOSYS DUE - \$1,000.00 PAID 13- MAY-2002	4/26/2002
241880	011496	ANGELA C DEMPSEY	9/12/2001	5/25/2002	COND	PERMIT CONDITION OR CONSENT ORDER/RESPONSE DUE	4/29/2002
241880	011496	ANGELA C DEMPSEY	9/12/2001	5/25/2002	CCD	CASE CLOSED IN DISTRICT	5/8/2002
241880	011496	ANGELA C DEMPSEY	9/12/2001	5/25/2002	DONE	CLOSING REQUEST RECEIVED FROM DISTRICT; COMPLIANCE COMPLETE.	5/8/2002
241880	011496	ANGELA C DEMPSEY	9/12/2001	5/25/2002	PCL	PROJECT CLOSED LETTER	5/8/2002
241880	011496	ANGELA C DEMPSEY	9/12/2001	5/25/2002	CC	CASE CLOSED IN OGC	5/25/2002
241880	011496	ANGELA C DEMPSEY	9/12/2001	5/25/2002		FILE SENT TO EPA - THEY HAVE THE LEAD PER ACD	7/12/2002
33721	911176	ALIKI A MONCRIEF	5/31/1991	2/25/2006	AR	RE-ASSIGNED TO LEAD ATTORNEY ALIKI A MONCRIEF	8/20/2004 3:31:08 PM
100547	972190	ALIKI A MONCRIEF	12/22/1997	9/19/2005	AR	RE-ASSIGNED TO LEAD ATTORNEY ALIKI A MONCRIEF	8/20/2004 3:31:08 PM
33721	911176	ALIKI A MONCRIEF	5/31/1991	2/25/2006	OCSA	OPEN CASE STORED IN ARCHIVES	6/21/2005
33721	911176	ALIKI A MONCRIEF	5/31/1991	2/25/2006		IN BOX 05-362	6/22/2005
100547	972190	ALIKI A MONCRIEF	12/22/1997	9/19/2005	OCSA	OPEN CASE STORED IN ARCHIVES	6/30/2005
100547	972190	ALIKI A MONCRIEF	12/22/1997	9/19/2005		IN BOX 05-410	7/6/2005
100547	972190	ALIKI A MONCRIEF	12/22/1997	9/19/2005	DONE	CLOSING REQUEST RECEIVED FROM DISTRICT; COMPLIANCE COMPLETE.	8/31/2005
100547	972190	ALIKI A MONCRIEF	12/22/1997	9/19/2005	FR	FILE REVIEW	8/31/2005
100547	972190	ALIKI A MONCRIEF	12/22/1997	9/19/2005	CCD	CASE CLOSED IN DISTRICT	9/1/2005



100547	972190	ALIKI A MONCRIEF	12/22/1997	9/19/2005	CFFE	RETURN TO COMPLIANCE FROM FORMAL ENFORCEMENT	9/1/2005
100547	972190	ALIKI A MONCRIEF	12/22/1997	9/19/2005	PCL	PROJECT CLOSED LETTER	9/1/2005
100547	972190	ALIKI A MONCRIEF	12/22/1997	9/19/2005	CC	CASE CLOSED IN OGC	9/19/2005
100547	972190	ALIKI A MONCRIEF	12/22/1997	9/19/2005		FILED REMOVED FROM STORAGE FOR CLOSURE PURPOSES	9/19/2005
241880	011496	ANGELA C DEMPSEY	9/12/2001	5/25/2002		IN BOX 02-267 & 05-738	10/20/2005
100547	972190	ALIKI A MONCRIEF	12/22/1997	9/19/2005		IN BOX 05-732	10/20/2005
33721	911176	ALIKI A MONCRIEF	5/31/1991	2/25/2006		NOTIFIED BY DISTRICT CASE CLOSED SINCE 10/6/96	11/29/2005
33721	911176	ALIKI A MONCRIEF	5/31/1991	2/25/2006	CC	CASE CLOSED IN OGC	2/25/2006
33721	911176	ALIKI A MONCRIEF	5/31/1991	2/25/2006		IN BOX 06-96	4/20/2006



CEI 4/10/1984

CEI 6/10/86

WLI 5/15/86 #52-86-07-240

CEI 11/3/87

WLI 1/6/88 #52-88-01-003

CEI 4/12/90

WLI 9/21/90 #152 764 767

CEI 8/6/91 #91-1176 #500.00

CEI 2/19/93

WLI 5/13/93 WM 93-0030

CEI 3/15/94

WLI 5/31/94 94-0062

CEI 10/16/96

WLI 4/11/97 #100547

CEI 4/29/98

CEI 9/17/99

CEI 8/19/00

✓ CEI 8/13/01 - concrete surfaces in need  
of repair.

page 2 para 5

✓ CEI 7/24/02 concrete surfaces

✓ CEI 6/24/03

page 3 para 1

CEI 03/4/04

Area of Concern

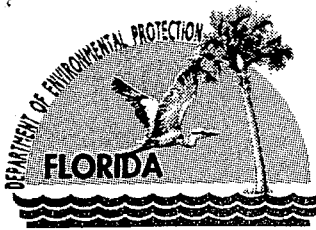
Processing Area south Tank #12

page 2 para 4 135

CEI 1/27/05

Area of Concern

page 3 para 3



# Department of Environmental Protection

Jeb Bush  
Governor

Southwest District  
13051 North Telecom Parkway  
Temple Terrace, FL 33637-0926  
Telephone: 813-632-7600

Colleen M. Castille  
Secretary

CERTIFIED MAIL  
RETURN RECEIPT REQUESTED

August 21, 2006

Mr. Tim Hagan, President  
Hagan Holding Company (dba HOWCO Environmental Services)  
3701 Central Avenue  
St. Petersburg, Florida 33713

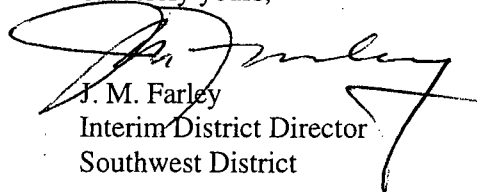
Re: HOWCO Environmental Services  
FLD 152 764 767  
Warning Letter # 293141  
Pinellas County

Dear Mr. Hagan:

Attached please find the penalty computation sheet the Department has developed for assessing penalties for alleged violations noted in the Department's Warning Letter #293141, dated July 21, 2006.

The attached penalty sheet will be discussed at our scheduled meeting on August 29, 2006. If you have any questions at this time, please contact Al Gephart at the letterhead address or at (813) 632-7600 Ext.372.

Sincerely yours,

  
J. M. Farley  
Interim District Director  
Southwest District

JMF/afg

Attachment

cc: Chris McGuire, FDEP, OGC  
Subra Putcha, FDEP, Tallahassee  
Rick Neves, FDEP, Tallahassee  
Susan Pelz, FDEP, Tampa  
Compliance File ✓

"More Protection, Less Process"

Printed on recycled paper.

### PENALTY COMPUTATION WORKSHEET

Violator's Name: HOWCO Environmental Services FLD 152 764 767

Identify Violator's Facility: 843 43<sup>rd</sup> Street South; St. Petersburg, FL 33711

Name of Department Staff Responsible for the Penalty Computations: Al Gephart

ComHaz Case #: 293141

Date: August 16, 2006

	Violation Type	Manual Guide	Citation	Penalty	Multi Day	Other Adjustments	Total
1.	Failure to maintain emergency equipment.	25.7 Maj/Mod	40 CFR 279.52(a)(3)	\$7,999-\$6,000	---	---	\$6,999
2.	Failure to amend the facility Contingency Plan.	ELRA	40 CFR 279.52(b)(4)(v)		---	---	Combined With #1 Above
3.	Failure to adequately train personnel.	ELRA	40 CFR 279.54 40 CFR 112.7(f)	\$500	---	---	\$500
4.	Failure to seal or otherwise protect from the weather containers of used oil.	ELRA	62-710.401(6)	\$500	---	---	\$500
5.	Failure to properly label containers of used oil.	ELRA	62-710.401(6)	\$500	---	\$125	\$625
6.	Failure to provide adequate secondary containment for containers of used oil.	ELRA	62-710.401(6)	\$500	---	---	\$500
7.	Failure to store used oil filters in sealed containers.	ELRA	62-710.850(5)(a)	\$500	---	\$500	\$1,000
8.	Failure to properly label containers of used oil filters.	ELRA	62-710.850(5)(a)	\$500	---	\$500	\$1,000
9.	Failure to provide an impervious surface for storage of used oil filters.	ELRA	62-710.850(5)(a)	---	---	---	Combined With #15 Below
10.	Failure to follow the required sampling protocol for processed oil.	29.1 Maj/Mod	Permit Cond. II.8(a)	\$7,999-\$6,000	---	---	\$6,999
11.	Failure to perform required analyses of processed oil.	29.1	Permit Cond. II.8(c)(2)	---	---	---	Combined with #10 above
12.	Accepting unpermitted materials for processing or storage.	ELRA SW-2	Permit Cond. IV.1(b)	\$3,000	---	---	\$3,000
13.	Failure to repair or replace processing equipment within one week of discovery.	ELRA Gen-7	Permit Cond. IV.3(b)	\$1,000	---	---	\$1,000



**PENALTY COMPUTATION WORKSHEET (CONTINUED)**

Violator's Name: HOWCO Environmental Services FLD 152 764 767

Identify Violator's Facility: 843 43<sup>rd</sup> Street South; St. Petersburg, FL 33711

Name of Department Staff Responsible for the Penalty Computations: Al Gephart

ComHaz Case #: 293141

Date: August 16, 2006

Violation Type		Manual Guide	Citation	Penalty	Multi Day	Other Adjustments	Total
14.	Failure to sample, analyze and characterize materials to meet disposal facility criteria.	ELRA Gen-4	Permit Cond. IV.5(c)	\$2,000	---	---	\$2,000
15.	Failure to provide an impervious surface for storing or processing oily waste solids.	ELRA SW-2	Permit Cond. IV.6(b)	\$10,000-\$8,000	---	\$2,500	\$12,500
16.	Failure to store processed solids in a covered, lined roll-off container.	ELRA	Permit Cond. IV.6(b)		---	---	Combined With #15 Above
17.	Failure to properly label containers of processed solids.	ELRA	Permit Cond. IV.7(d)	\$500	---	\$125	\$625
18.	Failure to maintain required records of waste streams.	ELRA	Permit Cond. IV.9	\$500	---	---	\$500
Departmental Costs:							\$750
<b>TOTAL PENALTY:</b>							<b>\$38,498</b>

**PENALTY COMPUTATION WORKSHEET (CONTINUED)**

Violator's Name: HOWCO Environmental Services FLD 152 764 767

Identify Violator's Facility: 843 43<sup>rd</sup> Street South; St. Petersburg, FL 33711

Name of Department Staff Responsible for the Penalty Computations: Al Gephart

ComHaz Case #: 293141

Date: August 16, 2006

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**NOTES:**

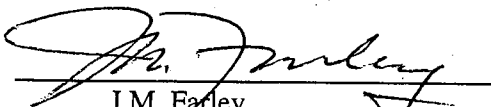
For citation (5) above [62-710.401(6), FAC, failure to properly label containers of used oil] an additional \$125 was assessed because there was one previous violation [403.121(7)(a), F.S.].

For citation (7) above [62-710.850(5)(a), FAC, failure to seal or otherwise protect from the weather, containers of U.O.F], an additional \$500 was added because there have been four previous violations [403.121(7)(c), F.S.].

For citation (8) above [62-710.850(5)(a), FAC, failure to properly label containers, "Used Oil Filters"] an additional \$500 was added because there were three previous violations [403.121(7)(c), F.S.].

For citation (15) above [failure to comply with Specific Condition IV.6(b) in the facility's operating permit, failure to store processed solids in a lined, covered roll-off container] an additional \$2,500 was assessed because there was one previous violation [403.121(7)(a), F.S.].

For citation (17) above [failure to comply with Specific Condition IV.7(d), FAC in the facility's operating permit, failure to properly label containers of processed solids] an additional \$125 was assessed because there was one previous violation [403.121(7)(a), F.S.].

  
J.M. Farley  
Interim District Director  
Southwest District

8/18/06  
Date



Jeb Bush  
Governor

# Department of Environmental Protection

Southwest District  
13051 North Telecom Parkway  
Temple Terrace, FL 33637-0926  
Telephone: 813-632-7600

Colleen M. Castille  
Secretary

July 21, 2006

CERTIFIED MAIL 7004 0750 0003 0516 4905  
RETURN RECEIPT REQUESTED

Mr. Tim Hagan, President  
Hagan Holding Company (dba HOWCO Environmental Services)  
3701 Central Avenue  
St. Petersburg, Florida 33713

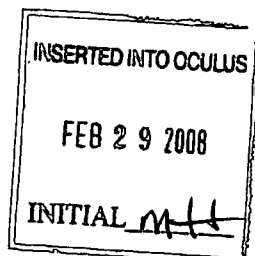
Re: HOWCO Environmental Services  
FLD 152 764 767  
Warning Letter #293141  
Pinellas County

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. Hazardous waste program field inspections conducted on November 7, 2005, January 5, 2006 and June 1, 2006, indicate 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.

Sections 403.161 and 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 Al Gephart at (813)632-7600, extension 372, 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.



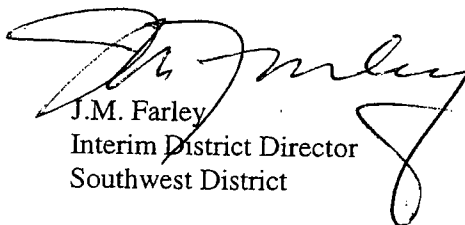
"More Protection, Less Process"

Printed on recycled paper.

Please be advised that this Warning Letter is part of an agency investigation, preliminary to agency action in accordance with Section 120.57(5), 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, the penalties which can be assessed in hazardous waste cases are up to \$27,500 per day per violation

If this investigation confirms that your facility is significantly out of compliance, and the case is not resolved through timely entry of a Consent Order, under the Department's agreement with the EPA, a formal referral for judicial action must be made to the Department's Office of General Counsel. We look forward to your cooperation in completing the investigation and resolution of this matter.

Sincerely yours,

  
J.M. Farley  
Interim District Director  
Southwest District

JMF/afg

Attachment

cc: Charles Ryburn, Pinellas County DEM  
Jeff Pallas, US EPA Region IV  
Mike Redig, HWR Section  
Compliance File





Jeb Bush  
Governor

# Department of Environmental Protection

Southwest District  
13051 North Telecom Parkway  
Temple Terrace, FL 33637-0926  
Telephone: 813-632-7600

Colleen M. Castille  
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 43<sup>rd</sup> Street South; St. Petersburg, FL 33711

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

**COUNTY:** Pinellas **PHONE:** (727) 327-8467 **DATE:** 11/07/05 **TIME:** 10:05 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 registration
- ☐ 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:**

- |  |   |   |   |
|--|---|---|---|
| <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 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 checked="" type="checkbox"/> 62-730, FAC | <input checked="" type="checkbox"/> 62-740, FAC |

3. **RESPONSIBLE OFFICIAL:**

Tim Hagan, President

4. **INSPECTION PARTICIPANTS:**

Al Gephart - FDEP	Danielle Nichols - FDEP	Bret Galbraith - FDEP
Kelly Honey - FDEP	Richard Dillen - HOWCO	Juan Rullier, HOWCO

5. **LATITUDE/LONGITUDE:** 27°45'41.6" / 82°41'32.5"

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

INSERTED INTO OCULUS

FEB 29 2008

INITIAL MH

"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 and accepts oily waste solids which are processed and solidified prior to disposal at a landfill. The processing of solid wastes is overseen by the Department's Solid Waste Management Program that also participated in this inspection.

Upon inspecting the used oil processing area it was observed that there were three open containers of used oil in the area of tank #170. Failure to label containers of used oil and failure to seal containers of used oil, or otherwise protect them from the weather, are violations of **62-710.401(6), FAC**.

Solid waste managed at the facility includes oily solid waste generated by HOWCO and its clients. The solidified wastes are managed as non-hazardous material. On two inspection dates, November 7, 2005 and on January 5, 2006, the drum storage area on the south side of the property, west and east of the used oil filter crusher, was inspected. On 11/7/05 it was observed that the surface of the secondary containment area was no longer "impervious" as required. HOWCO had been advised in past compliance inspections dated 8/13/01, 7/24/02 and 6/24/03 that this was an area of concern to the Department and that HOWCO was to assess this area by power washing the surface, inspecting the integrity of the concrete floor and seal coat and make repairs, as needed. On this inspection it was observed that there were cracks throughout the entire containment area and the entire area was not impervious to contaminants. This is a violation of **62-710.850(5)(a), FAC**. During a follow-up site visit on June 1, 2006, it was observed that the facility had cleaned and re-sealed the secondary containment area. However, there were areas in which the sealant had been gouged off due to the movement of roll-off boxes in and out of the area. The facility needs to address how they will ensure an impervious surface.

At the time of the 11/7/05 inspection, there were five (5) roll-off boxes being stored in the Solids Storage and Sludge Separation Areas. Two contained solid waste, one contained demolition and yard debris, one contained used oil filters and the fifth was empty. It was observed that one roll-off box of processed material had a puncture in one of its plastic "doors". This is a violation of **Specific Condition IV.6(b)** in the facility's operating permit which requires that all processed solids shall be stored in covered, lined roll-off containers or covered drums on impervious surfaces. Also observed was one covered roll-off box containing processed waste which was labeled "EMPTY". This is a violation of **Specific Condition IV.7(d)** in the facility's operating permit which states that such containers shall be labeled "Processed Solid Waste". During the inspection, facility personnel stated that one of the facility's vacuum trucks had been down for a month and no replacement equipment had been found as yet. This is a violation of **Specific Condition IV.3(b)** in the facility's operating permit which requires in such event, the permittee shall complete repairs or provide reserve equipment within one week of discovery of the equipment failure.

The drum storage area also contained fifty seven (57) drums of oily waste and more than 100 drums of used oil filters. Department staff inspected the shipment from GAF that included 57 drums (manifest #0070133962) most of which were labeled "used oil" that were received on or around October 19, 2005 by the facility. Upon examination of the contents of these drums, it was observed that little of the material was suitable/useable to recover used oil. A subsequent discussion with Mike Wolfe regarding this shipment revealed that the facility was aware that very little of the material could be processed and HOWCO would essentially just be taking the material to the landfill. The waste was not readily identifiable, and a good portion appeared to be trash, contaminated with small amounts of oil. There was also a roll-off of various construction and demolition debris that was not apparently contaminated by oil.

Facility personnel explained to DEP staff that this roll-off came from a “sister” facility’s yard and was going to Okeechobee Landfill and that the present facility was only being used as a transfer point. These activities are in violation of **Specific Condition IV.1(b)** (the accepted materials lists) in the facility’s operating permit.

Of over 100 drums of used oil filters, there were a large number of drums improperly labeled and one roll-off box of used oil filters that was covered with a tarp made from a mesh material. On 1/5/06 it was observed that there was one drum of used oil filters that had no lid, and there was no lid in the area. On a site visit 6/1/06 four drums of used oil filters were not sealed or protected from the weather. Failure to properly seal containers of used oil filters or otherwise protect them from the weather is a violation of **62-710.850(5)(a), FAC**.

There was a container of used oil that was not sealed and not protected from the weather, and it was observed that there were approximately thirty-three 55-gallon drums that were improperly labeled “water & oil mixed.” Failure to properly label and seal containers of used oil or otherwise protect them from the weather are violations of **62-710.401(6), FAC**.

In addition, on both site visits it was disturbing to the inspectors that the Plant Manager and facility personnel could not tell the inspectors what the contents were of many drums and could not explain the labeling on containers. This indicates a deficiency in the facility’s training program. The failure to properly train facility personnel managing wastes is a violation of **40 CFR 279.54** [used oil processor/refiners are subject to all applicable Spill Prevention Control and Countermeasures (40 CFR part 112)]. 40 CFR 112.7(f)(1) addresses personnel training. At a minimum, facility personnel are to be trained in the operation and maintenance of equipment to prevent discharges; discharge procedure protocols; applicable pollution control laws, rules, and regulations; general facility operations; and the contents of the facility’s SPCC and Contingency Plans.

During the 1/5/06 site visit it was observed that personnel were processing solid waste in a roll-off box in the solid waste processing area. Mulch was being added to oily solid waste for solidification prior to disposal. Mulch is not one of the approved solidification agents. Because HOWCO did not provide written notice of its use to the Department, it is a violation of **Specific Condition IV.1(a)(12)** in the facility’s operating permit. The area around the roll-off box had pools of used oil, and the roll-off box was laden with pools of used oil. During a site visit on 2/16/06 it was again observed that there was a roll-off box in the solids processing area that had a pool of oil on top of the tarp. Under the tarp, the contents were laden with a pool of used oil. These are violations of **Specific Condition IV.10** in the facility’s operating permit. In processing oily waste, the correct procedure is for HOWCO to recover any used oil in either the cone bottom tank (#110) or the inclined tank (#111) prior to processing the waste. It appeared that this was not being done. Failure to perform a hazardous waste determination prior to land disposal of this material is a violation of **40 CFR 262.11 [per 40 CFR 279.10(e)(3)(i)]**. Also, the roll-off box was not properly labeled, “Processed Solids”. On a site-visit 6/1/06 it was again observed that a roll-off box was not properly labeled, “Processed Solids.” This is a violation of **Specific Condition IV.7(d)** in the facility’s operating permit.

There were two 55-gallon drums of used oil behind the laboratory in secondary containment. However, there was oil in the secondary containment, and the secondary containment does not appear to have the capacity to contain at least 110% of the largest container. This is a violation of **62-710.401(6), FAC**. The facility shall ensure that the containment system is emptied to accommodate any future spills or leaks and that there is the appropriate containment capacity.

The fire and emergency equipment are inspected monthly and are tested annually. Fire extinguishers were serviced in August and October 2005, except for the maintenance shop fire extinguisher that was last serviced in November 2004. The facility is to ensure that all fire extinguishers are serviced annually.

DEP staff also observed that not all outgoing material to be disposed was sampled and analyzed on an annual basis. This is a violation of **Specific Condition IV.5(c)** in the facility's operating permit, which requires such sampling and analysis be done on an annual basis or more frequently if required. Records of waste streams at the facility were found to be inadequate. This is a violation of **Specific Condition IV.9** in the facility's operating permit. It was observed that there was not a signed waste profile form for each waste stream received, and that some manifests did not have a date on which the manifest was signed and/or did not have the signatory's name printed on the manifest. On some occasions, it was found that the waste stream was not adequately identified (i.e. "Sludge") with any description of where or from what materials/process the waste was generated.

On January 5, 2006, the facility was re-visited to review operating records. Upon reviewing the sampling protocol for determining whether off-site shipments of oil were "on-spec", it was determined that from January to December 2005 the facility had not been following the random sampling procedure as specified in its operating permit. This is a violation of **Specific Condition II.8(a)** in the facility's operating permit. In addition, the facility did not sample one tank (or batch) every two weeks as required. Of a possible 26 sampling events HOWCO sampled only 24 times in 2005. This is a violation of **Specific Condition II.8(c)(2)** in the facility's operating permit. It was also observed that Batch #2586 was sampled on 12/28/05 and loads were shipped off-site on 12/29/05 which was before the results for the previous batch (Batch #2585 sampled on 12/27/05) were received. The purpose of the sampling program is to determine compliance with the "on-spec" criteria for processed oil. It is not appropriate to ship processed oil prior to the specification analyses being received.

The monthly inspection logs were reviewed and found to be complete. However, it was noted that on the January 2005 inspection log the loud speaker for communications was not functional and corrective action was required. This same notation was noted on the February, March, April and May 2005 inspection logs. On the June 2005 inspection log it was noted that the communications system was okay, but on the July 2005 inspection log it was again noted as not being functional. On the August 2005 inspection log it was noted that the facility started using a megaphone for communications. Failure to provide or maintain emergency equipment such as the communications and alarm systems is a violation of **40 CFR 279.52(a)(3)**. Failure to amend the facility Contingency Plan to denote a change in emergency procedures is a violation of **40 CFR 279.52(b)(4)(v)**. Failure to train personnel of the availability and use of the communication system is a violation of **40 CFR 279.54 [reference to 40 CFR 112.7(f)]**. The one megaphone or bull horn is kept in the Plant Manager's office. The facility shall either get the loud speaker system repaired or find other devices of communication and provide multiple units for facility personnel to use. The facility shall also train facility personnel on the usage of the communication device(s).

HOWCO was delinquent in submitting its Used Oil Processing Permit Renewal Application. The application was due on June 4, 2005, sixty (60) days prior to the expiration date of the existing permit. This is a violation of **62-710.800(4), FAC**. The District received a copy of the permit renewal application on July 26, 2005.

HOWCO was also delinquent in submitting its Solid Waste Processing Permit Renewal Application. Rule 62-4.090(1), FAC, requires that sixty days prior to permit expiration the permittee shall apply for a renewal of the permit. The permit renewal application was submitted (Aug. 29, 2005) and was not made



complete prior to the expiration of the permit. The application was not timely, and the permit expired, yet the facility has continued to operate without authorization (a permit). This is in violation of Rules **62-701.300(1)(a), FAC, and 62-701.320(10)(a), FAC**, which state that no person shall store, process, or dispose of solid waste except at a permitted solid waste facility or a facility exempt from permitting under certain circumstances, and if a renewal application is submitted prior to sixty days before expiration of the existing permit, it will be considered timely and sufficient. If the renewal application is submitted at a later date, it will not be considered timely and sufficient, unless is it submitted and made complete prior to the expiration of the existing permit. During the November 7, 2005, compliance inspection, facility personnel were advised that they were operating without a solid waste permit. This is a violation of 62-701.320(1), FAC.

#### **10. SUMMARY OF ALLEGED VIOLATIONS:**

40 CFR 262.11	Failure to make a hazardous waste determination prior to treating used oil processing residuals, or un-processable residuals.
40 CFR 279.52(a)(3)	Failure to maintain a functioning communications or alarm system.
40 CFR 279.52(b)(4)(v)	Failure to amend the facility's Contingency Plan (after a change in emergency communications procedure.)
40 CFR 279.54	Failure to adequately train personnel.
62-701.300(1)(a), FAC and 62-701.320(10)(a), FAC	Failure to submit a solid waste facility processing facility permit renewal application in a timely manner.
62-701.320(1), FAC	Operating a solid waste management facility without a permit issued by the Department.
62-710.401(6), FAC	Failure to seal or otherwise protect from the weather containers of used oil. <b>(Repeat Violation).</b>
	Failure to properly label containers of used oil. <b>(Repeat Violation).</b>
	Failure to provide adequate secondary containment capacity for containers of used oil.
62-710.800(4), FAC	Failure to submit a used oil processor facility renewal permit application to the Department at least 60 days prior to the expiration date of the existing permit.
62-710.850(5)(a), FAC	Failure to seal, or otherwise protect from the weather, containers of used oil filters. <b>(Repeat Violation).</b>

	Failure to properly label containers, "Used Oil Filters." (Repeat Violation).
	Failure to provide an impervious surface for the storage of containers of used oil filters. (Corrected)
Specific Condition II.8(a)	Failure to follow sampling protocol for processed oil. (Corrected)
Specific Condition II.8(c)(2)	Failure to sample and analyze processed oil at the required frequency.
Specific Condition IV.1(a)(12)	Failure to use an authorized solidification agent for processing solids.
Specific Condition IV.1(b)	Failure to perform acceptance screening on materials prior to processing or storage.
Specific Condition IV.3(b)	Failure to repair or replace inoperable processing equipment within one week of discovery.
Specific Condition IV.5(c)	Failure to, at least annually, sample, analyze and characterize materials to meet intended disposal facilities' acceptance criteria.
Specific Condition IV.6(b)	Failure to provide an impervious surface for storing or processing oily waste solids. (Corrected)
	Failure to store solids in a covered, lined roll-off container.
Specific Condition IV.7(d)	Failure to properly label containers of processed solids with the words, "Processed Solids."
Specific Condition IV.9	Failure to maintain required records of waste streams (signed waste profile of material received, dated signed manifests and proper description of waste.)
Specific Condition IV.10	Failure to contain, clean up and properly manage released oil and oily waste.

#### 11. RECOMMENDED CORRECTIVE ACTIONS:

40 CFR 262.11

Effective immediately and henceforth, the facility shall ensure that solid wastes are characterized prior to landfilling for disposal.

40 CFR 279.52(a)(3)	Effective immediately and henceforth, the facility shall ensure that communications or alarm systems are functional.
40 CFR 279.52(b)(4)(v)	Effective immediately and henceforth, the facility shall amend the facility's Contingency Plan to reflect changes in the facility's operations and procedures.
40 CFR 279.54	Effective immediately and henceforth, the facility shall ensure personnel are adequately trained.
62-701.300(1)(a), FAC and 62-701.320(10)(c), FAC	Effective immediately and henceforth, the facility shall ensure that it makes timely submittals regarding all of its operating permit requirements.
62-701.320(1), FAC	Effective immediately the facility shall cease its solid waste management activities until issued a permit by the Department.
62-710.401(6), FAC	Effective immediately and henceforth, the facility shall ensure that used oil containers are sealed or protected from the weather, are properly labeled and there is adequate capacity in the secondary containment to contain 110% of the largest container within containment.
62-710.800(4), FAC	Effective immediately and henceforth, the facility shall ensure that it makes timely submittals regarding all of its operating permit requirements.
62-710.850(5)(a), FAC	Effective immediately and henceforth, the facility shall ensure that used oil filters are stored in containers that are sealed or otherwise protected from the weather, properly labeled and stored on an impervious surface.
Specific Condition II.8(c)(2)	Effective immediately and henceforth, the facility shall ensure that it performs the required analyses of processed oil as specified in the facility's operating permit.
Specific Condition IV.1(a)(12)	Effective immediately and henceforth, the facility shall ensure that it uses an approved solidification agent for processing oily waste or requests and receives prior Department approval for use of an alternate agent.
Specific Condition IV.1(b)	Effective immediately and henceforth, the facility shall limit the acceptance of solid waste to those materials specified and defined in the facility's operating permit.

Specific Condition IV.3(b)	Effective immediately and henceforth, the facility shall repair or replace operating equipment within one week after discovery.
Specific Condition IV.5(c)	Effective immediately and henceforth, the facility shall ensure, at least annually, to sample, analyze and characterize materials to meet intended disposal facilities' acceptance criteria.
Specific Condition IV.6(b)	Effective immediately and henceforth, the facility shall ensure that processed solids are stored in a lined and covered roll-off container.
Specific Condition IV.7(d)	Effective immediately and henceforth, the facility shall ensure that containers of processed solids are properly labeled, "Processed Solids."
Specific Condition IV.9	Effective immediately and henceforth, the facility shall maintain complete and accurate records of waste profiles, manifests and proper descriptions of materials received.
Specific Condition IV.10	Effective immediately and henceforth, the facility shall ensure that personnel contain, clean up and properly manage released oil and oily waste.

Report Prepared By: Al Gephart  
Al Gephart Engineering Specialist IV

Report Reviewed By: Danielle Nichols  
Danielle Nichols Environmental Specialist I

Report Reviewed By: Kelly Honey  
Kelly Honey Environmental Specialist II

Report Approved By: Elizabeth Knauss  
Elizabeth Knauss Environmental Manager

Date 6/19/06



Inspectors: Gephart / Honey / Nichols  
Date: November 7, 2005

## INSPECTION CHECKLIST

*HOWCO Environmental Services  
843 43<sup>rd</sup> Street South  
St. Petersburg, FL 33711  
FLD 152 764 767*

Permit No.	92465-HO06-001	Renewal Application
Issued	08/03/00	Being Reviewed
Expires	08/03/05	

Last Inspection 1/27/05

### 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. (CENTRAL AVE OFFICE) ☒ Y Y N
- GC.14 Operating records contain the required information: ☒ Y 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. (2/28/05) ☒ Y Y N
- The facility has submitted its annual Closure Cost Update by March 1. ☒ Y Y N  
FDEP APPROVED ON 5/9/05
- 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  
ONE WAS "REBUTTED"

##### Part II. Used Oil Processing

- II.3 Only permitted waste streams are processed at the facility. ☒ Y Y N ?  
- SOME QUESTION ON SOME WHITE STREAMS. NEEDS FURTHER INVESTIGATION AND FUTURE MONITORING
- II.4 Generators supply initial TCLP analysis (or generator knowledge statement) of waste antifreeze. (Check facility files for certifications.) ☒ Y Y N

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- 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 include all of the required information as stated in 40 CFR 279.56 (Acceptance / Delivery); ☐ Y ☐ N
  - Training records; ☒ 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. ☒ Y ☐ N

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

**Part III. Tanks**

- III.1 Used oil tanks and containers are labeled "Used Oil". ☒ Y ☐ N *\* FACILITY AND DEP NEED TO DETERMINE PROPER LABELING FOR TANKS #140-144*
- III.2 Regulated tank systems are inspected monthly. ☒ Y ☐ N *105, 106, AND 180 THESE WERE FRESHLY PAINTED. WERE NOT LABELED YET.*
- 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. ☐ Y ☒ N ←
- 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. ☒ Y ☐ N
- Accumulated precipitation is removed within 1 week after a rainfall event using manually controlled pumps. ☐ Y ☐ N *NO PRECIPITATION OBSERVED*

**Part IV. Solid Waste Processing**

- Household hazardous wastes or wastes from a CESQG are NOT managed as solid waste at the facility. ☒ Y ☐ N
- IV.3 Processing equipment is repaired within one week of becoming inoperable. ☒ Y ☐ N *EQUIPMENT WAS OPERABLE AT TIME OF INSPECTION*
- Operations **DO NOT** change the chemical characteristics of any of the solid materials. ☒ Y ☐ N
- IV.4 Each solid waste stream is sampled and analyzed at least annually. ☒ Y ☐ N
- Records are available of annual WWTS sampling and analyses. ☐ Y ☒ N \*

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- Records are available of annual oil-extracted sludge (OES) sampling and analyses. *\* SAMPLED ON 12/20/05. RESULTS WERE NOT AVAILABLE ON 1/5/06 SITE VISIT.* ☐ Y ☒ N <sup>\*</sup>
- Vibratory screen filter solids are containerized, properly sealed and labeled, "Screen Filter Residue". *NOT MENTIONED BY SOLID WASTE INSPECTOR IN HIS REPORT* ☐ Y ☐ 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.) ☒ Y ☐ N
- The facility has notified the Department within 3 days prior to sampling any solid waste streams. ☒ Y ☐ N
- The facility has records of hazardous waste determinations from each generator for all solid waste streams received. ☒ Y ☐ N
- The determinations are updated *annually. EVERY 3 YRS* ☒ Y ☐ N
- IV.5 All outgoing materials for disposal are sampled and analyzed annually. ☒ Y ☒ N
- IV.6 Storage of solid waste is at or below 22,000 gallons.  
Where 15 yd<sup>3</sup> = 3,030 gallons  
20 yd<sup>3</sup> = 4,040 gallons ☐ Y ☒ N
- Processed solids are stored in covered, lined, roll-off containers or covered drums and stored on an impervious surface. ☐ Y ☒ N
- IV.7 All processed and unprocessed solid wastes are stored within the Solids Storage and Sludge Separation Areas. ☒ Y ☐ N
- All materials are processed on impervious surfaces, tanks or containers. *surface has deteriorated / cracks* ☐ Y ☒ N ←
- 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. *correct there was some observed* ☐ 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. *\* Spillable onto asphalt when mixing solids* ☒ Y ☐ N
- The Solids Storage and Sludge Separation Areas are inspected monthly. ☒ Y ☐ N
- IV.9 The facility maintains the following waste records:
- 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]; ☐ Y ☐ N

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- 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; \_\_Y \_\_N
- The pre-burn analysis for each shipment of contaminated soil received that will be transferred to a soil treatment facility; \_\_Y \_\_N
- The pre-acceptance analyses or waste determinations; \_\_Y \_\_N
- Copies of any analyses required by a disposal facility as a condition of acceptance and documentation of acceptance; \_\_Y \_\_N
- Monthly Waste Inspection/Corrective Action logs; \_\_Y \_\_N
- Copies of permits for facilities that receive the processed solids. \_\_Y \_\_N

Monthly compilations are submitted quarterly of the following:

- Material balance (quantities received versus quantities disposed or in storage); \_\_Y \_\_N
- 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; \_\_Y \_\_N
- Annual submittal of proof of financial assurance. \_\_Y \_\_N

**Part V. Contingency Plan**

V.2 Emergency and spill equipment is available at the facility. ☒Y \_\_N  
 Check the emergency equipment stored east of the truck wash rack and at the drum crusher.

V.3,4 Emergency and safety equipment is available, tested and maintained. \_\_Y ☒N *LOW SPEAKER COMMUNICATION SYSTEM WAS DOWN FOR 6 MONTHS NOW RELYING ON ONE "BULLHORN"*

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. ☒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.

*\* From observations made, training is inadequate!*

☒ 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 2/25/05
- Used Oil Filter Processor

☒ 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. 2/28/05

☒ Y ☐ N

- 62-710.850(6) All used oil filters are stored in ~~YES~~ <sup>NO</sup>
- Above ground containers on impermeable surfaces; ☒ Y ☒ N
  - Sealed containers that are in good condition; ☒ Y ☒ N
  - Containers labeled, "Used Oil Filters". ☐ Y ☒ N

<sup>NO</sup> Upon detection of any leaking oil from a container the oil is contained, cleaned-up and managed properly. <sup>YES</sup> *\* not immediately*

☒ 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

<input checked="" type="checkbox"/> Permit Application.	<input checked="" type="checkbox"/> Operating Permit.
<input checked="" type="checkbox"/> Validated Annual Used Oil Registration [Form 62-701.900(13)]. <i>2/28/05</i> <i>AND used oil filter 2/25/05</i>	<input checked="" type="checkbox"/> Annual Used Oil Recovery Report. <i>2-28-05</i>
<input checked="" type="checkbox"/> Annual DEP Registration Placard For Storage Tanks. <i>2/25/05</i>	<input checked="" type="checkbox"/> Contingency Plan. <i>7-21-99</i>
<input checked="" type="checkbox"/> Training Logs.	<input checked="" type="checkbox"/> Closure Plan.
<input type="checkbox"/> Results of Annual Waste Analyses For All Solid Waste Streams <i>Disposed.</i> <i>RICHARD DID NOT HAVE.</i>	<input checked="" type="checkbox"/> Annual Closure Cost Update <i>DEP APPROVED ON 5/9/05</i>
<input checked="" type="checkbox"/> Results of Annual Waste Analyses For All Solid Waste Streams <i>Received From</i> Generators. <i>EVERY 3 YRS OR WHEN PROCESS CHANGES</i>	<input checked="" type="checkbox"/> Transporter Liability Insurance [\$100,000 minimum]. <i>EXPIRED 7/2/05</i> <i>copy provided EXPIRED</i> <i>FACILITY PROVIDED A CURRENT POLICY THAT EXPIRES 7-2-06</i>
<input checked="" type="checkbox"/> Processed Oil Sampling Logs [Minimum Of One Sample Every Two Weeks]. <i>NO.</i>	<input checked="" type="checkbox"/> Monthly Inspection Logs Of The Solids Storage and Sludge Separation Areas.
<input checked="" type="checkbox"/> Tank Inspections and Monthly Release Detection Monitoring.	<input checked="" type="checkbox"/> Annual Analyses Of WWT and OES Sludges. <i>BOTH SAMPLED 12/20/05</i> <i>* and Analyses</i>
<input type="checkbox"/> Analysis Of Vibrascreen Filter Solids and Tank Bottom Sludges <i>NONE. SAMPLED #110</i> [Unless Processed In Tanks 110 or 111].	<input type="checkbox"/> Generator Non-Haz Demonstration For Used Antifreeze. <i>ALL ANTIFREEZE RECYCLED</i>
<input type="checkbox"/> Documentation Of Annual Closure Cost Estimate [Solid Waste Processing].	<input checked="" type="checkbox"/> Records Of Refused Used Oil Shipments <i>NONE REJECTED</i>
<input type="checkbox"/> Records Of Quantities Of Waste Received, Stored, Processed and Disposed.	<input checked="" type="checkbox"/> Documentation Of Annual Financial Assurance [Solid Waste Processing] DEP Approved 5/9/05 Next Submittal by 3/1/06
<input type="checkbox"/> Records Of Disposal Or Treatment Facility For All Solid Wastes Removed [Name and Location].	<input type="checkbox"/> Quarterly Submittals Of Material Balance Of Quantities Of Solid Waste.
<input type="checkbox"/> Copies Of Permits For Facilities Receiving Processed Wastes.	<input checked="" type="checkbox"/> Monthly Solid Waste Inspection / Corrective Actions Logs.
<input checked="" type="checkbox"/> Monthly Inspection Logs Of Safety and Emergency Equipment. <i>DEFICIENT IN COMMUNICATION SYSTEM</i>	<input type="checkbox"/> Manifests / Bill-Of-Lading. <b>CHECK to see if CESQG status</b>