ENFORCEMENT/COMPLIANCE COVER MEMO

TO: ☒ William Kutash, Environmental Administrator

FROM/THROUGH: Jim Dregne, Program Manager
Al Gephart, Engineering Specialist IV

DATE: August 31, 2005

FILE NAME: HOWCO Environmental Services **PROJECT #:** 100547
OGC # 97-2190

PROGRAM: Hazardous Waste **COUNTY:** Pinellas

TYPE OF DOCUMENT:

☐ Draft **or** ☒ Final ☐ NOV ☐ Consent Order
☐ Final Order ☐ Case Report ☐ Penalty Authorization
☐ Warning Letter ☒ Other: **Case Closed Letter**

DESCRIPTION OF VIOLATIONS:

File Review of Open Enforcement Case.
Conditions of the Consent Order:
Activities to be completed by HOWCO included, (1) payment of civil penalties of $26, 150, (2) waste characterization of wastewater treatment sludge and oil extraction sludge (OES), (3) pressure testing of all underground piping, (4) P.E. certification and capacity calculations of reconstructed secondary containment areas and (5), publication notice of the consent order.

SUMMARY OF CORRECTIVE ACTIONS:

(1) The final payment of the assessed penalties was received 6/30/00.
(2) Waste characterization of WWT sludge and OES was completed on 1/19/00 and continues annually.
(3) Pressure tests of underground piping were submitted 8/25/99
(4) P.E. certifications, containment calculations and site diagrams were submitted on 4/16/04.
(5) The notice was published 7/15/99

The facility has met the conditions in the referenced Consent Order.

PENALTY SUMMARY:

RCRA Guidelines

Penalty Amount: $ 25,650.00 Expenses: $ 500.00

TOTAL PENALTY PAID: $ 26,150 ON 6/30/00

Department of Environmental Protection

Jeb Bush
Governor

Southwest District
3804 Coconut Palm Drive
Tampa, Florida 33619

Colleen M. Castille
Secretary

September 1, 2005

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

Re: Consent Order, OGC Case No. 97-2190
HOWCO Environmental Services
FLD 152 764 767, Pinellas County

Dear Mr. Hagan:

The Department has conducted a file review of your submittals in regard to the referenced enforcement case.

As all other conditions of this Consent Order have been met, this enforcement action is now closed. Thank you for your cooperation in resolving this matter.

Sincerely,

William Kutash
Administrator
Division of Waste Management

WK/afg

Enclosure

cc:
Larry Morgan, OGC
Steve Ray, HWR Section
Jeff Pallas, US EPA Region IV
Compliance File

Florida Department of Environmental Protection

Memorandum

SOUTHWEST DISTRICT

TO: Larry Morgan
Office of General Counsel

THROUGH: William Kutash, Program Administrator
James Dregne, Hazardous Waste Program Manager 8/31

FROM: Al Gephart

DATE: August 31, 2005

SUBJECT: Case Closure Request
Hagan Holding Co. (dba HOWCO Environmental Services)
Facility EPA ID# FLD 152 764 767, OGC Case# 97-2190
Pinellas County

A file review was conducted and the last required submittal was received from HOWCO on April 16, 2004. Since all provisions of the subject Consent Agreement have been met, it is requested that this case be closed.

Amount of penalties: $26, 150.00

AFG

February 17, 2004

HOWCO USED OIL PROCESSOR OPERATING PERMIT APPLICATION

REVISED FIGURES and SECONDARY CONTAINMENT CALCULATIONS

The Facility Is Delinquent In Providing The Following Information To The Department.

✓ RCVD 4-16-04

Application Form For A Used Oil Processing Facility Permit

✓ Part I Page 9 Item #4 Professional Engineer Information

✓ Part II Page 15 Professional Engineer certification

Attachment 3 Detailed Process Description

✓ Page 3-4 Revision Of Table 3-1

Attachment 8 Contingency Plan

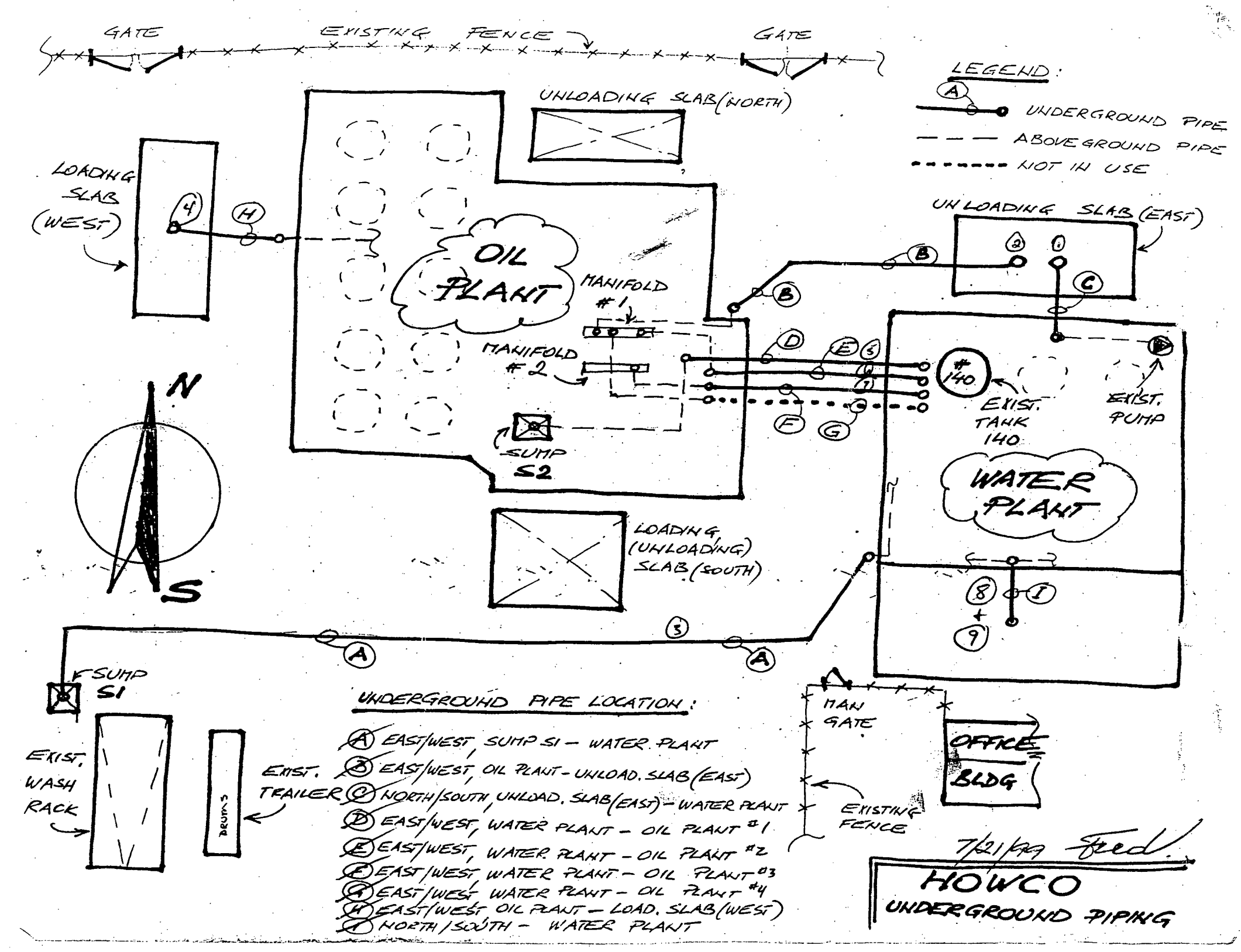
Revisions (Signed And Sealed By A Professional Engineer) Of The Following:

Secondary Containment Calculations

- ✓ Sheet #1
- ✓ Sheet #2
- ✓ Sheet #3
- ✓ Sheet #4
- ✓ Sheet #7
- ✓ Sheet #11
- ✓ Sheet #12

Drawings

- ✓ D-4-1
- ✓ D-4-2
- ✓ D-6-1
- ✓ D-8-1
- ✓ D-8-2
- ✓ D-10-1


GATE
EXISTING FENCE
GATE
LEGEND:
UNDERGROUND PIPE
ABOVE GROUND PIPE
NOT IN USE
UNLOADING SLAB (NORTH)
LOADING SLAB (WEST)
OIL PLANT
MANIFOLD #1
MANIFOLD #2
SUMP S2
UNLOADING SLAB (EAST)
#140
EXIST. TANK 140
EXIST. PUMP
WATER PLANT
LOADING (UNLOADING) SLAB (SOUTH)
N
S
SUMP S1
EXIST. WASH RACK
EXIST. TRAILER
DRUMS
MAN GATE
EXISTING FENCE
OFFICE BLDG
UNDERGROUND PIPE LOCATION:
A EAST/WEST, SUMP S1 – WATER PLANT
B EAST/WEST, OIL PLANT – UNLOAD. SLAB (EAST)
C NORTH/SOUTH, UNLOAD. SLAB (EAST) – WATER PLANT
D EAST/WEST, WATER PLANT – OIL PLANT #1
E EAST/WEST, WATER PLANT – OIL PLANT #2
F EAST/WEST, WATER PLANT – OIL PLANT #3
G EAST/WEST, WATER PLANT – OIL PLANT #4
H EAST/WEST, OIL PLANT – LOAD. SLAB (WEST)
I NORTH/SOUTH – WATER PLANT
7/21/89 Fred
HOWCO
UNDERGROUND PIPING

UNDERGROUND PIPING — TESTS RCVD 8-25-99

CERTIFICATION FOR Containment area #1 RCVD 2-14-00

SITE DRAWINGS — DOCUMENTS RCVD 14-16-04
Secondary Containment Calculations

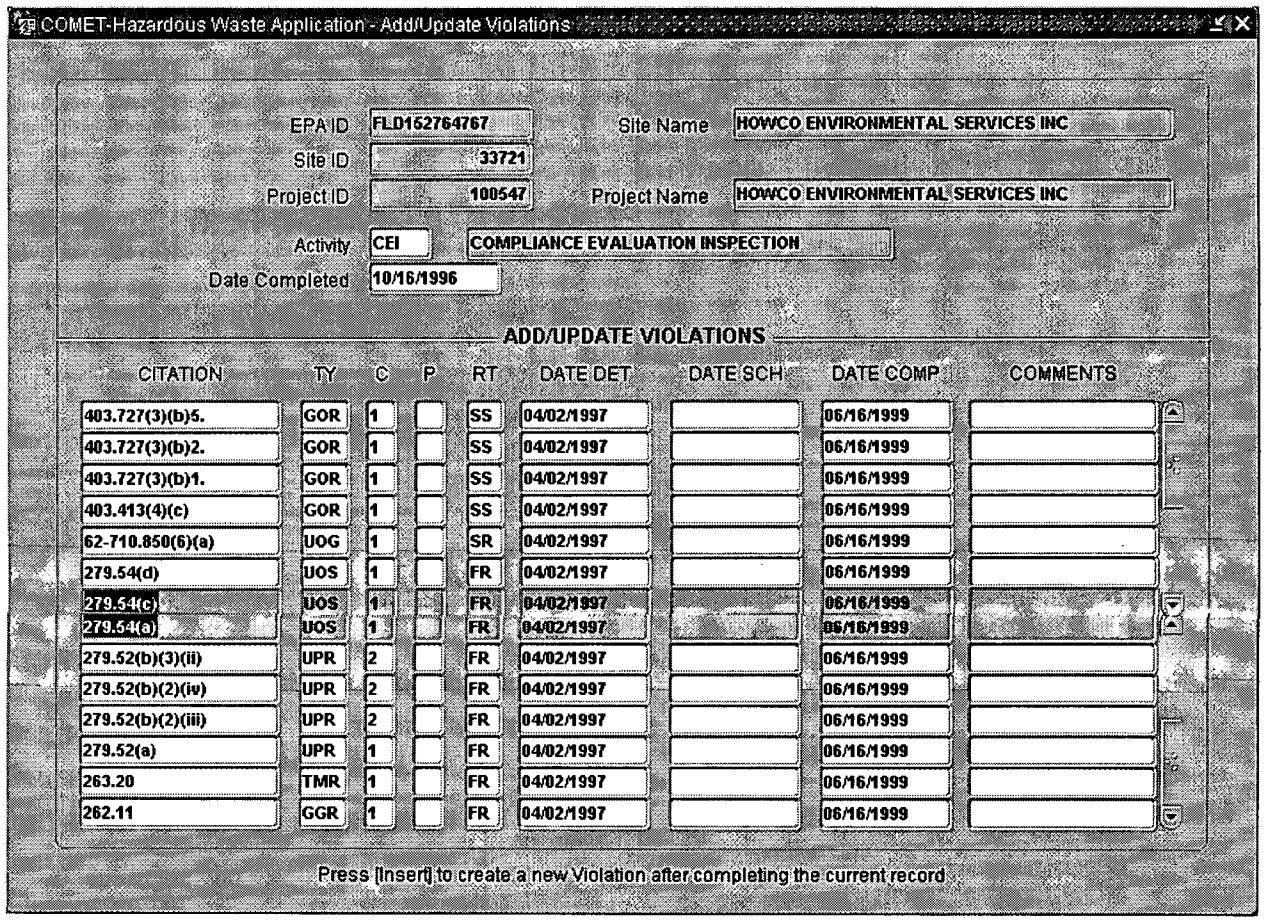
Part of Part of CO 7-15-99

PAYMENTS

7-6-99 $1762.50
9-16-99 $5,000.00
8-24-99 $1762.50
9-24-99 $1762.50
10-29-99 $1762.50
11-29-99 $1762.50 — 12-23-99 ?
2-1-00 $1762.50
2-28-00 $1762.50
4-3-00 $1762.50
5-1-00 $1762.50
6-6-00 $1762.50 — 6-30-00 ? LAST PAYMENT Made 6-30-00

ALL 12 ENTRIES IN AREA 2

WWT SHUCKS and OES SAMPLING
7-12-99
11-11-99
1-19-00
10/11/99


COMET-Hazardous Waste Application - Add/Update Violations
EPA ID
FLD152764767
Site Name
HOWCO ENVIRONMENTAL SERVICES INC
Site ID
33721
Project ID
100547
Project Name
HOWCO ENVIRONMENTAL SERVICES INC
Activity
CEI
COMPLIANCE EVALUATION INSPECTION
Date Completed
10/16/1996
ADD/UPDATE VIOLATIONS
CITATION
TY
C
P
RT
DATE DET
DATE SCH
DATE COMP
COMMENTS
403.727(3)(b)5.
GOR
1
SS
04/02/1997
06/16/1999
403.727(3)(b)2.
GOR
1
SS
04/02/1997
06/16/1999
403.727(3)(b)1.
GOR
1
SS
04/02/1997
06/16/1999
403.413(4)(c)
GOR
1
SS
04/02/1997
06/16/1999
62-710.850(6)(a)
UOG
1
SR
04/02/1997
06/16/1999
279.54(d)
UOS
1
FR
04/02/1997
06/16/1999
279.54(c)
UOS
1
FR
04/02/1997
06/16/1999
279.54(a)
UOS
1
FR
04/02/1997
06/16/1999
279.52(b)(3)(ii)
UPR
2
FR
04/02/1997
06/16/1999
279.52(b)(2)(iv)
UPR
2
FR
04/02/1997
06/16/1999
279.52(b)(2)(iii)
UPR
2
FR
04/02/1997
06/16/1999
279.52(a)
UPR
1
FR
04/02/1997
06/16/1999
263.20
TMR
1
FR
04/02/1997
06/16/1999
262.11
GGR
1
FR
04/02/1997
06/16/1999
Press [Insert] to create a new Violation after completing the current record

12-2-96 INSP

Hilton University of Florida
Conference Center Gainesville

HOWCO File # 1 1996

8/20/96 LT. JAN RADJESKI ST PETERSBURG
FIRE & RESCUE - Prevention DIVISION
CITED MANY CONCERNS

OCT. 16-17, 1996 INSP. Pinellas County Tank program
- HABAN TO "line pressure test" underground piping { CONNECTING EAST AND WEST TANK FARMS
- HABAN TO repair holes in roof of TANK 142
- HABAN TO construct secondary containment by 12-31-97

✓ TANK #142 WAS TESTED

1-10-97
Underground piping @ "NO GOOD" DETERMINATIONS ON LEAK TEST
- #2 LINE: Oil & water from north valving station in oil plant tank farms to tanks 150 in holding tank farms 3" sch 40 steel pipe
- #6 Line: Oil & water supply from water ~~treatment~~ tanks 192 to sludge tank 108 next to filter crusher west of wash rack (3" sch 80 PVC)

determined to be non regulated line

#1, 3, 4 and 5 lines hold 1-hour

OCT. 16-17-1996 CEI W.L. Issued 4-11-97
262.11 263.20 279.52(a)(1) 279.52(b)(2)(iii)(iv)
279.54(a), (c), (d) 62-710.850(6)(a)

06c#
01-1496

HOWCO
FILE # 2, 3, 4
1996 - 99

File #2 HAS DRAFT CO's and negotiating correspondence between Lamar Lockett and Randy Strasser

File #3

7/12/99 WWT SLUDGE, OES } samples => PASSED TCLP
FDEP ALSO ANALYZED SPLIT SAMPLES

8/6/99 PAID $1762.50

7/15/99 Proof of publication of CO

8-16-99 Norris & Sinion tested all underground lines and they passed
There were a total of 9 lines all being 3"

9-16-99 PAID $5,000

8-24-99 PAID $1762.50

9-24-99 PAID $1762.50

10-29-99 PAID $1762.50

10/11/99 WAS 2ND SAMPLING event

QUARTERLY SAMPLING
11-11-99 HOWCO ANALYZED OES, TANK 111 AND WWTP SLUDGE
WWTP SLUDGE exceeded Benzene => DISPOSED AS HAZARDOUS WASTE
FDEP ALSO ANALYZED SPLIT SAMPLE

11-29-99 PAID $1762.50

11-30-99 FDEP FINES HOWCO AN Additional $9400 for not upgrading secondary containment for Tanks #110/#112 and the used oil container storage area.

HOWCO FILE #4 continued-1

12-3-99 FDEP sent HOWCO certification forms to fill out and submit for secondary containment.

12-10-99 HOWCO Submitted secondary containment certifications for Areas #1, 2, 5

2ND QTRLY SAMPLING

1-19-00 SAMPLING OF OES, WWT SLUDGE
WWT FAILED Benzene & Trichloroethylene

6-16-99 FDEP NOTIFIES HOWCO OF COMMITMENT DATES (see copy)

Randy witnessed removal of Tanks 170-173 There was no cement under the tanks and the white rock underneath was heavily stained with oil – VIOLATION OF CONSENT ORDER

?

1-28-00 FDEP notified HOWCO That the Dept. has not received Engineer's certification for Containment Area #1
Work was to be completed by 1-1-00 and certification submitted within 30 days

HOWCO Submitted ON 2-14-00

Missed penalty payment due 12-30-99

2-1-00 PAID $1762.50 # 7 of 12

ON 2-14-00 HOWCO SAID CHECK WAS Sent 12-23-99

ENTRIES MADE INTO CHART

HOWCO File #4 CONTINUED-2

Hilton University of Florida
Conference Center Gainesville

1-19-00 Samples of WWT, OES

2-28-00 Paid $1762.50 #8 of 12

2-11-00 Containment Areas 1 & 2 being upgraded to meet 40 CFR 279.54 (d)

4-3-00 PAID $1762.50 #9 of 12

5-10-00 PAID $1762.50 #10 of 12

6-6-00 PAID #1762.50 #11 of 12 PAYMENTS

#12 Payment ?

only time record of 10 checks of $1762.50 MISSING 12-30-99 6-30-00

352.371.3600 • 1714 SW 34th Street • Gainesville, Florida 32607 • fax 352.371.0306 • www.hilton.com

$ 26,150 TOTAL IN Consent Order

9-16-99 $ 5,000
$ 1,762.50 * 12 monthly payments

9-29-98 insp cited violations THAT ARE IN EXECUTED CO and OO will be resolved when conditions of the CO are met.

9-17-99 insp - NO violations

9-19-00

6-24-03 insp - requested drawings & secondary containment calcs from HOWCO to resolve CO 097-2190

3-4-04 MUST HAVE Rcvd DRAWINGS - NOT mentioned in EEI report

9/99 8-24-99 7-21-99 Testing results of all underground piping
Rcvd 8-25-99

18/04 4-16-04 Rcvd "Secondary Containment. Drawings & Calculations Rcvd 4-16-04 ✓

Department of Environmental Protection

Jeb Bush
Governor

Southwest District
3804 Coconut Palm Drive
Tampa, Florida 33619

David B. Struhs
Secretary

June 16, 1999

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

RE: Howco Environmental Services
EPA ID No. FLD 152 764 767
Pinellas County
OGC Case No. 97-2190

Dear Mr. Hagan:

Enclosed is the executed Consent Order in the above-referenced case. Please note the following compliance dates and actions required of Howco Environmental Services by conditions of the Consent Order:

DONE 1. The initial penalty installment payment of $1762.50 is due within 30 days of the effective date of the Consent Order. Eleven additional installment payments of $1762 50 each will be due by the last day of each following month.

DONE 2. Notification is due to the Department within 60 days of the effective date, along with the information specified in paragraph 9.a., if you intend to implement the pollution prevention project of replacing the specified underground piping at the facility with double-walled piping. If you choose not to implement the project, then a $5000.00 payment towards the civil penalty, in addition to the payments specified above, will be due within 90 days of the effective date.

Done 3. Sampling of the wastewater treatment sludge and "OES" for TCLP analysis shall be performed within 30 days of the effective date. After the initial sampling, at least three additional quarterly analyses of these waste streams shall be performed and annual analyses thereafter. Verbal notification to the Department is required at least three days prior to each scheduled sampling event.

Done 4. Within 60 days of the effective date pressure test the underground piping running between the sump and the storage tank in containment area #3, and within 120 days of the effective date provide certification to the Department that all the requirements specified in paragraph 10.b.(1) have been met for providing secondary containment for used oil containers, or ensure that all containers of used oil are stored within secondary containment structures consisting of a dike, berm or retaining wall and a floor that are impervious to used oil.

Done 5. Within 30 days of the deadline after each task for upgrading the used oil tank secondary containment structures as specified in paragraphs 10.b.(2) through 10.b.(5), provide certification by a P.E. to the Department in accordance with the requirements of paragraph 10.b.(6).

Done 6. Within 60 days of the effective date perform pressure testing on all underground piping in use for conveying used oil and/or PCW.

DONE

7. Within 21 days of the effective date publish the notice specified in paragraph 19 and provide proof of publication to the Department within 7 days after publication.

Compliance with the conditions of the Consent Order will end this enforcement case. If you have any questions, please contact me at (813) 744-6100, extension 387.

Sincerely,

Randall H. Strauss

Randall H. Strauss
Environmental Specialist II
Division of Waste Management

Enclosure

cc: Agusta Posner, OGC
Laurel Lockett, Carlton Fields
Susan Pelz, Solid Waste Permitting-SWD
Morgan Leibrandt, HWR-Tallahassee
Charlie Ryburn, Pinellas Co. DEM

	Waste Water WTS	OES
1 Q 7/99	OK	ok
2 Q 10/99	2 failures 2 retest ok	OK
3 Q 1/2000	~~Twelfth~~	
4 Q		

Florida Department of Environmental Protection
Hazardous Waste Compliance/Enforcement Tracking System
Project Summary Report
Date: 02-DEC-1999

Project Id: 100547
Name: HOWCO ENVIRONMENTAL SERVICES INC
Reason: ENFORCEMENT
Status: OPEN **Open Date:** 16-OCT-1996 **Priority:** N
Coordinator: STRAUSS_R
Description: RCRA INSPECTION
Office: SOUTHWEST DISTRICT
County: PINELLAS

Ogc #: 972190 **Style:** HAGAN HOLDING COMPANY; DEP VS.

Attorney: AGUSTA POSNER

Completed	Activity
22-DEC-97	
22-DEC-97	AMENDED CONSENT ORDER ISSUED
22-DEC-97	
22-DEC-97	
23-FEB-98	
16-JUN-99	
16-JUL-99	
30-AUG-99	
30-SEP-99	
31-OCT-99	
30-NOV-99	
31-DEC-99	
31-JAN-00	
29-FEB-00	
31-MAR-00	
16-JUN-99	
16-JUN-99	
30-APR-00	

Program Area: HW

Date Due: **Date Complete:** **Done Date:** 16-JUN-1999 **Activity:** COE
Pats #: **Ogc #:** 97-2190 **Cond #:**
Evaluation: **Eval Results:**
Prep Notes: **Completion Notes:** CO includes penalties, 2nd contain upgrades and waste determ

Assigned to: STRAUSS_R

Date Due: **Date Complete:** **Done Date:** 16-JUN-1999 **Activity:** SNN
Pats #: **Ogc #:** 97-2190 **Cond #:**
Evaluation: **Eval Results:**
Prep Notes: **Completion Notes:** Facility RTC w/ execution of CO 6/16/99

Assigned to: STRAUSS_R

Florida Department of Environmental Protection
Hazardous Waste Compliance/Enforcement Tracking System
Project Summary Report
Date: 02-DEC-1999

Project Id: 100547
Name: HOWCO ENVIRONMENTAL SERVICES INC
Reason: ENFORCEMENT
Status: OPEN **Open Date:** 16-OCT-1996 **Priority:** N
Coordinator: STRAUSS_R
Description: RCRA INSPECTION

Program Area: HW

Date Due: **Date Complete:** **Done Date:** 14-SEP-1998 **Activity:** CALL
Pats #: **Ogc #:** **Cond #:**
Evaluation: **Eval Results:**
Prep Notes: Telecon w/ Hagan - CO due or issue NOV **Completion Notes:**

Assigned to: STRAUSS_R

Date Due: **Date Complete:** **Done Date:** 11-MAR-1998 **Activity:** DCOI
Pats #: **Ogc #:** 97-2190 **Cond #:**
Evaluation: **Eval Results:**
Prep Notes: **Completion Notes:**

Assigned to: STRAUSS_R

Date Due: **Date Complete:** **Done Date:** 06-MAR-1998 **Activity:** LTR
Pats #: **Ogc #:** **Cond #:**
Evaluation: **Eval Results:**
Prep Notes: Response to settlement offer due **Completion Notes:**

Assigned to: STRAUSS_R

Date Due: **Date Complete:** **Done Date:** 02-APR-1997 **Activity:** SNY
Pats #: **Ogc #:** **Cond #:**
Evaluation: **Eval Results:**
Prep Notes: **Completion Notes:**

Assigned to: STRAUSS_R

Date Due: 30-JUN-2000 **Date Complete:** **Done Date:** **Activity:** COND
Pats #: **Ogc #:** 97-2190 **Cond #:**
Evaluation: **Eval Results:**
Prep Notes: 12 of 12 $1762.50 payment due **Completion Notes:**

Assigned to: STRAUSS_R

Date Due: 01-JUN-2000 **Date Complete:** **Done Date:** **Activity:** COND
Pats #: **Ogc #:** 97-2190 **Cond #:**
Evaluation: **Eval Results:**
Prep Notes: Completion of application of impervious coating to contain #3 **Completion Notes:**

Florida Department of Environmental Protection
Hazardous Waste Compliance/Enforcement Tracking System
Project Summary Report
Date: 02-DEC-1999

Project Id: 100547
Name: HOWCO ENVIRONMENTAL SERVICES INC
Reason: ENFORCEMENT
Status: OPEN **Open Date:** 16-OCT-1996 **Priority:** N
Coordinator: STRAUSS_R
Description: RCRA INSPECTION

Program Area: HW

Date Due: 28-FEB-2000 **Date Complete:** **Done Date:** **Activity:** COND
Pats #: **Ogc #:** 97-2190 **Cond #:**
Evaluation: **Eval Results:**
Prep Notes: 8 of 12 $1762.50 payment due **Completion Notes:**

Assigned to: STRAUSS_R

Date Due: 30-JAN-2000 **Date Complete:** **Done Date:** **Activity:** COND
Pats #: **Ogc #:** 97-2190 **Cond #:**
Evaluation: **Eval Results:**
Prep Notes: 7 of 12 $1762.50 payment due **Completion Notes:**

Assigned to: STRAUSS_R

Date Due: 15-JAN-2000 **Date Complete:** **Done Date:** **Activity:** COND
Pats #: **Ogc #:** 97-2190 **Cond #:**
Evaluation: **Eval Results:**
Prep Notes: 3 of 4 TCLP sampling of WWTS and OES due **Completion Notes:**

Assigned to: STRAUSS_R

Date Due: 01-JAN-2000 **Date Complete:** **Done Date:** **Activity:** COND
Pats #: **Ogc #:** 97-2190 **Cond #:**
Evaluation: **Eval Results:**
Prep Notes: Completion of coating contain #1 due **Completion Notes:**

Assigned to: STRAUSS_R

Date Due: 30-DEC-1999 **Date Complete:** **Done Date:** **Activity:** COND
Pats #: **Ogc #:** 97-2190 **Cond #:**
Evaluation: **Eval Results:**
Prep Notes: 6 of 12 $1762.50 payment due **Completion Notes:**
DEC 30 — WWT Sludge results due
DEC 22 — "

Assigned to: STRAUSS_R

Date Due: 15-DEC-1999 **Date Complete:** 10DEC99 **Done Date:** 10 DEC 99 **Activity:** COND
Pats #: **Ogc #:** 97-2190 **Cond #:**
Evaluation: **Eval Results:**
Prep Notes: Completion of application of impervious coating to contain #2 **Completion Notes:**

Florida Department of Environmental Protection
Hazardous Waste Compliance/Enforcement Tracking System
Project Summary Report
Date: 02-DEC-1999

Project Id: 100547
Name: HOWCO ENVIRONMENTAL SERVICES INC
Reason: ENFORCEMENT
Status: OPEN **Open Date:** 16-OCT-1996 **Priority:** N
Coordinator: STRAUSS_R
Description: RCRA INSPECTION

Program Area: HW

Date Due: 15-DEC-1999 **Date Complete:** 10 DEC99 **Done Date:** 10 DEC99 **Activity:** COND
Pats #: **Ogc #:** 97-2190 **Cond #:**
Evaluation: **Eval Results:**
Prep Notes: Completion of application of impervious coating to contain #2 **Completion Notes:**

Assigned to: STRAUSS_R

Date Due: 30-NOV-1999 **Date Complete:** 19 NOV99 **Done Date:** 19 NOV99 **Activity:** COND
Pats #: **Ogc #:** 97-2190 **Cond #:**
Evaluation: **Eval Results:**
Prep Notes: 5 of 12 $1762.50 payment due **Completion Notes:**

Assigned to: STRAUSS_R

Date Due: 15-NOV-1999 **Date Complete:** 10 DEC99 **Done Date:** 10 DEC99 **Activity:** COND
Pats #: **Ogc #:** 97-2190 **Cond #:**
Evaluation: **Eval Results:**
Prep Notes: PE cert due of completion of UO container storage area upgrades **Completion Notes:**

Assigned to: STRAUSS_R

Date Due: 15-NOV-1999 **Date Complete:** 10 DEC99 **Done Date:** 10 DEC99 **Activity:** COND
Pats #: **Ogc #:** 97-2190 **Cond #:**
Evaluation: **Eval Results:**
Prep Notes: PE cert due of completion of south contain #2 upgrade **Completion Notes:**

Assigned to: STRAUSS_R

Date Due: 30-OCT-1999 **Date Complete:** 29 OCT99 **Done Date:** 29 OCT99 **Activity:** COND
Pats #: **Ogc #:** 97-2190 **Cond #:**
Evaluation: **Eval Results:**
Prep Notes: 4 of 12 $1762.50 payment due **Completion Notes:**

Assigned to: STRAUSS_R

Florida Department of Environmental Protection
Hazardous Waste Compliance/Enforcement Tracking System
Project Summary Report
Date: 02-DEC-1999

Project Id: 100547
Name: HOWCO ENVIRONMENTAL SERVICES INC
Reason: ENFORCEMENT
Status: OPEN **Open Date:** 16-OCT-1996 **Priority:** N
Coordinator: STRAUSS_R
Description: RCRA INSPECTION

Program Area: HW

Date Due: 15-OCT-1999 **Date Complete:** 11 OCT 99 **Done Date:** 11 OCT 99 **Activity:** COND
Pats #: **Ogc #:** 97-2190 **Cond #:**
Evaluation: **Eval Results:**
Prep Notes: 2 of 4 TCLP sampling of WWTS and OES due **Completion Notes:**

Assigned to: STRAUSS_R

Date Due: 30-SEP-1999 **Date Complete:** 24-SEP-1999 **Done Date:** 24-SEP-1999 **Activity:** COND
Pats #: **Ogc #:** 97-2190 **Cond #:**
Evaluation: **Eval Results:**
Prep Notes: 3 of 12 $1762.50 paement due **Completion Notes:**

Assigned to: STRAUSS_R

Date Due: 16-SEP-1999 **Date Complete:** 16-SEP-1999 **Done Date:** 16-SEP-1999 **Activity:** COND
Pats #: **Ogc #:** 97-2190 **Cond #:** 9.a.
Evaluation: **Eval Results:**
Prep Notes: $5000 payment due - did not elect to upgrade piping w/ 2nd containment **Completion Notes:**

Assigned to: STRAUSS_R

Date Due: 15-SEP-1999 **Date Complete:** 10 DEC 99 **Done Date:** 10 DEC 99 **Activity:** COND
Pats #: **Ogc #:** 97-2190 **Cond #:**
Evaluation: **Eval Results:**
Prep Notes: PE cert due of contain for Tank #110 & #111 **Completion Notes:**

Assigned to: STRAUSS_R

Date Due: 30-AUG-1999 **Date Complete:** 24-AUG-1999 **Done Date:** 24-AUG-1999 **Activity:** COND
Pats #: **Ogc #:** 97-2190 **Cond #:**
Evaluation: **Eval Results:**
Prep Notes: 2 of 12 $1762.50 payment due **Completion Notes:**

Assigned to: STRAUSS_R

Florida Department of Environmental Protection
Hazardous Waste Compliance/Enforcement Tracking System
Project Summary Report
Date: 02-DEC-1999

Project Id: 100547
Name: HOWCO ENVIRONMENTAL SERVICES INC
Reason: ENFORCEMENT
Status: OPEN **Open Date:** 16-OCT-1996 **Priority:** N
Coordinator: STRAUSS_R
Description: RCRA INSPECTION

Program Area: HW

Date Due: 15-AUG-1999 **Date Complete:** 16-SEP-1999 **Done Date:** 16-SEP-1999 **Activity:** COND
Pats #: **Ogc #:** 97-2190 **Cond #:**
Evaluation: **Eval Results:**
Prep Notes: Notification of piping upgrade due **Completion Notes:** Facility declined P2 credit for piping upgrade-paid addtl $5000

Assigned to: STRAUSS_R

Date Due: 15-AUG-1999 **Date Complete:** 25-AUG-1999 **Done Date:** 21-JUL-1999 **Activity:** COND
Pats #: **Ogc #:** 97-2190 **Cond #:**
Evaluation: **Eval Results:**
Prep Notes: Pressure test on all underground piping due **Completion Notes:** Testing performed 7/21 - results recvd SWD 8/25 - all pass

Assigned to: STRAUSS_R

Date Due: 27-JUL-1999 **Date Complete:** 21-JUL-1999 **Done Date:** 12-JUL-1999 **Activity:** COND
Pats #: **Ogc #:** 97-2190 **Cond #:**
Evaluation: **Eval Results:**
Prep Notes: TCLP sampling of WWTS and OES done 7/12 - results due **Completion Notes:**

Assigned to: STRAUSS_R

Date Due: 15-JUL-1999 **Date Complete:** 06-JUL-1999 **Done Date:** 06-JUL-1999 **Activity:** COND
Pats #: **Ogc #:** 97-2190 **Cond #:**
Evaluation: **Eval Results:**
Prep Notes: 1 of 12 $1762.50 payment due **Completion Notes:**

Assigned to: STRAUSS_R

Date Due: 13-JUL-1999 **Date Complete:** 19-JUL-1999 **Done Date:** 19-JUL-1999 **Activity:** COND
Pats #: **Ogc #:** 97-2190 **Cond #:**
Evaluation: **Eval Results:**
Prep Notes: Proof of publication due **Completion Notes:**

Assigned to: STRAUSS_R

Project Id: 100547
Name: HOWCO ENVIRONMENTAL SERVICES INC
Reason: ENFORCEMENT
Status: OPEN **Open Date:** 16-OCT-19
Coordinator: STRAUSS_R
Description: RCRA INSPECTION

Program Area: HW

Date Due: 23-SEP-1997 **Date Co**
Pats #: **Ogc #:**
Evaluation: **Eval Re**
Prep Notes: Settlement offer to L.
9/8-response due

Assigned to: STRAUSS_R

Date Due: 15-SEP-1997 **Date Co**
Pats #: **Ogc #:**
Evaluation: **Eval Re**
Prep Notes: Position letter to HOWC

Assigned to: STRAUSS_R

Date Due: 15-MAY-1997 **Date C**
Pats #: **Ogc #:**
Evaluation: **Eval R**
Prep Notes: PA to Tally 4/11 - rev.

Assigned to: STRAUSS_R

Date Due: 26-APR-1997 **Date C**
Pats #: **Ogc #:**
Evaluation: **Eval R**
Prep Notes: Response to WL due

Assigned to: STRAUSS_R

Date Due: 02-DEC-1996 **Date C**
Pats #: **Ogc #:**
Evaluation: Y **Eval I**
Prep Notes: Inspection report due

Assigned to: STRAUSS_R

Project Id: 100547
Name: HOWCO ENVIRONMENTAL SERVICES INC
Reason: ENFORCEMENT
Status: OPEN **Open Date:** 16-OCT-1996 **Priority:** N
Coordinator: STRAUSS_R
Description: RCRA INSPECTION

Program Area: HW

Date Due: 14-MAY-1999 **Date Complete:** 10-JUN-1999 **Done Da**
Pats #: **Ogc #:** 97-2190 **Cond #:**
Evaluation: **Eval Results:**
Prep Notes: Final draft mailed 4/28 - return of signed Order due **Completion No**

Assigned to: STRAUSS_R

Date Due: 27-JAN-1999 **Date Complete:** 05-FEB-1999 **Done Da**
Pats #: **Ogc #:** 97-2190 **Cond #:**
Evaluation: **Eval Results:**
Prep Notes: Latest draft issued - response due **Completion No**

Assigned to: STRAUSS_R

Date Due: 29-NOV-1998 **Date Complete:** 24-JUN-1999 **Done Dat**
Pats #: **Ogc #:** **Cond #:**
Evaluation: Y **Eval Results:** SIGNIFICANT OUT-OF-C
Prep Notes: Inspection report due **Completion Not**

Assigned to: STRAUSS_R

Date Due: 05-JAN-1998 **Date Complete:** 06-FEB-1998 **Done Dat**
Pats #: **Ogc #:** **Cond #:**
Evaluation: **Eval Results:**
Prep Notes: Settlement offer to L. Lockett 12/16 - response due **Completion Not**

Assigned to: STRAUSS_R

Date Due: 02-OCT-1997 **Date Complete:** 14-NOV-1997 **Done Dat**
Pats #: **Ogc #:** **Cond #:**
Evaluation: **Eval Results:**
Prep Notes: Settle offer due from L. Lockett **Completion Not**

Assigned to: STRAUSS_R

Date Due: 23-SEP-1997 **Date Complete:** 16-SEP-1997 **Done Dat**
Pats #: **Ogc #:** **Cond #:**
Evaluation: **Eval Results:**
Prep Notes: Settlement offer to L. Lockett 9/8-response due **Completion Not**

DEP Form#	62-710.901(d)
Form Title	Used Oil Processing Facility Permit Application
Effective Date	December 23, 1996

APPLICATION FROM FOR A USED OIL PROCESSING PERMIT

PART II - CERTIFICATION

Form 62-710.901(d) P. E. Certification [Complete when required by Chapter 471, F.S. and Rules 62-4.050, 62-761,62-762, and 62-710, F.A.C.]

Use this form to certify to the Department of Environmental Protection for:

1. Certification of secondary containment adequacy (capacity), structural integrity (structural strength), and underground process piping for storage tanks, process tanks, and container storage.
2. Certification of leak detection.
3. Substantial construction modifications.
4. Those elements of a closure plan requiring the expertise of an engineer.
5. Tank design for new or additional tanks.
6. Recertification of above items.

Please Print or Type

_____ Initial Certification _____ Recertification

1. DEP Facility ID Number: _____ 2. Tank Numbers: _____

3. Facility Name: _____

4. Facility Address: _____

This is to certify that

_____
Signature

_____
Name (please type)

Florida Registration Number: _____

Mailing Address: _____
Street or P. O. Box

_____
City State Zip

Date: _____ Telephone ( ) _____

4-16-04

[PLEASE AFFIX SEAL]

DEP Form#	62-710.901(d)
Form Title	Used Oil Processing Facility Permit Application
Effective Date	December 23, 1996

APPLICATION FROM FOR A USED OIL PROCESSING PERMIT

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6. Recertification of above items.

Please Print or Type

_____ Initial Certification _____ Recertification

1. DEP Facility ID Number: _____ 2. Tank Numbers: _____

3. Facility Name: _____

4. Facility Address: _____

This is to certify that

_____
Signature

_____
Name (please type)

Florida Registration Number: _____

Mailing Address: _____
Street or P. O. Box

_____
City State Zip

Date: _____ Telephone ( ) _____

4-16-04

[PLEASE AFFIX SEAL]

DEP Form#	62-710.901(d)
Form Title	Used Oil Processing Facility Permit Application
Effective Date	December 23, 1996

APPLICATION FROM FOR A USED OIL PROCESSING PERMIT

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2. Certification of leak detection.
3. Substantial construction modifications.
4. Those elements of a closure plan requiring the expertise of an engineer.
5. Tank design for new or additional tanks.
6. Recertification of above items.

Please Print or Type

_____ Initial Certification _____ Recertification

1. DEP Facility ID Number: _____ 2. Tank Numbers: _____

3. Facility Name: _____

4. Facility Address: _____

This is to certify that

_____
Signature

_____
Name (please type)

Florida Registration Number: _____

Mailing Address: _____
Street or P. O. Box

_____
City State Zip

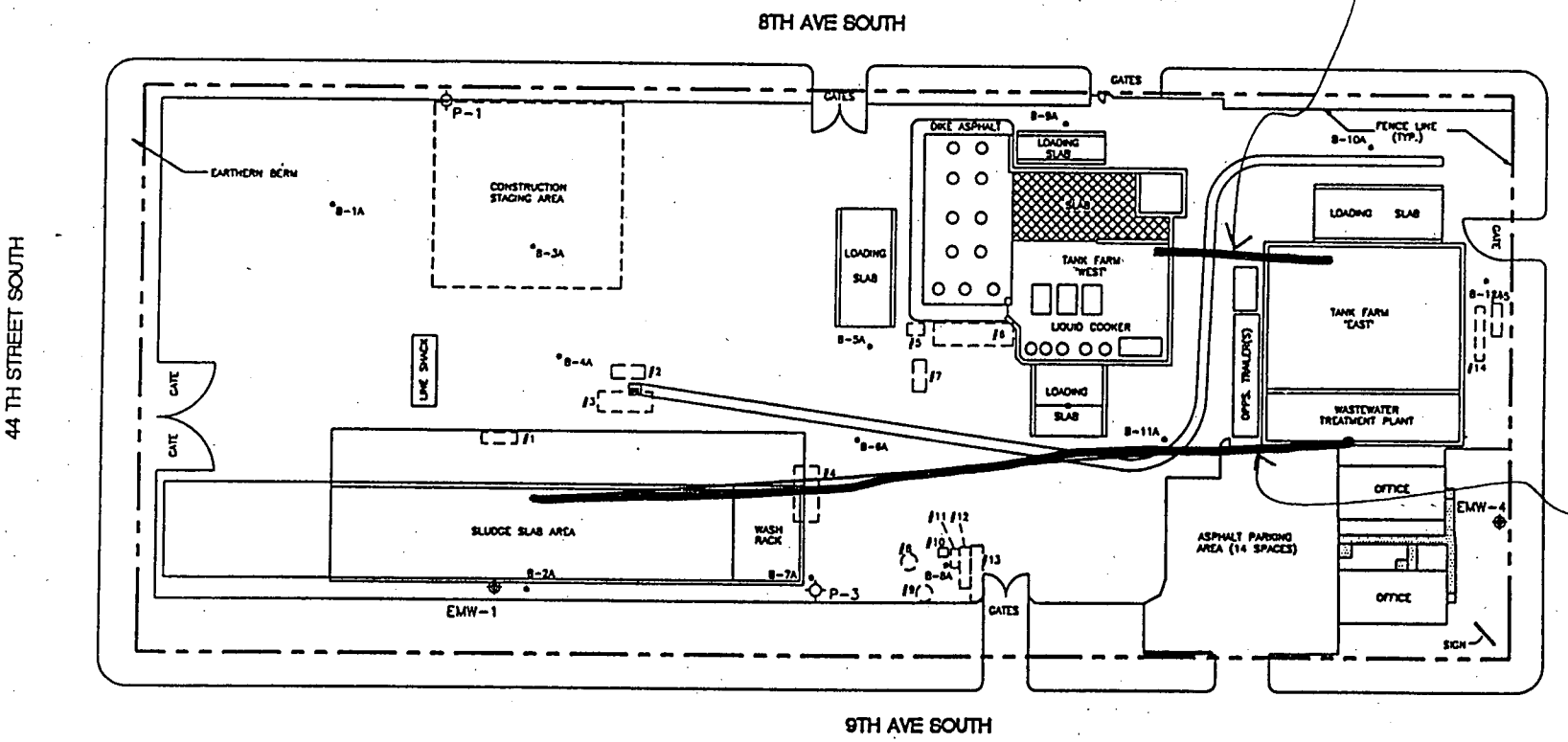
Date: _____ Telephone ( ) _____

4-16-04

[PLEASE AFFIX SEAL]

FIGURE 3A
SOIL BORING LOCATION MAP (OCTOBER 10, 1994)
HOWCO ENVIRONMENTAL SERVICES, INC.
ST. PETERSBURG, FLORIDA

APPROX. POSITION OF LINE #2



APPROX POSITION OF LINE #6

TANK CALLOUTS/ CAPACITY IN GALLONS	
#1 - 1,000 AGST GASOLINE	#9 - 10,000 STG. TANK
#2 - 2,000 UGST GASOLINE	#10 - 1,000 #2 FUEL TANK
#3 - 6,000 UGST DIESEL	#11 - 4,000 COOKER TANK
#4 - 2,000 AGST DIESEL	#12 - 9,000 TANKER TRAILER
#5 - 3,000 OIL TRAP	#13 - 20,000 USED OIL TANK
#6 - 5,500 OIL WATER SEP.	#14 - 5,000 #2 DIESEL
#7 - 1,000 STG. TANK	#15 - 3,000 LEADED GASOLINE
#8 - 8,000 STG. TANK	

LEGEND

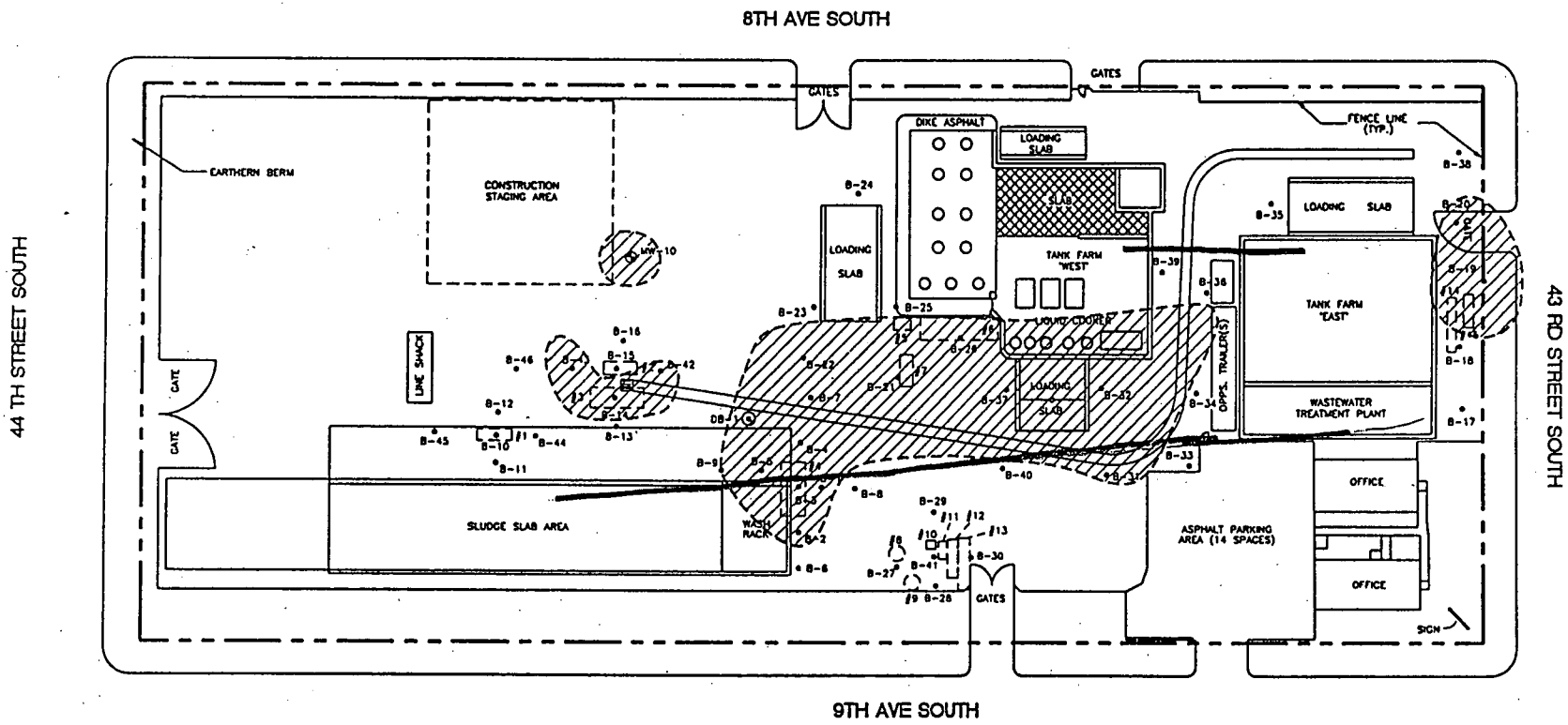
- EXISTING MONITORING WELL INSTALLED BY OTHERS
- PIEZOMETER LOCATION
- CONCRETE DRAINAGE SWALE AND DRAIN
- SOIL BORING LOCATION
- PROPERTY BOUNDARY LINE
- FORMER STORAGE TANK LOCATION

NOTE: LOCATIONS OF FORMER TANKS ARE APPROXIMATE.

APPROXIMATE Scale: 1"=80'

G94-216.82\SBMAP2 03-28-96 DS

FIGURE 8
APPROXIMATE EXTENT OF EXCESSIVELY CONTAMINATED SOIL
HOWCO ENVIRONMENTAL SERVICES, INC.
ST. PETERSBURG, FLORIDA



TANK CALLOUTS/ CAPACITY IN GALLONS	
#1 - 1,000 AGST GASOLINE	#9 - 10,000 STG. TANK
#2 - 2,000 UGST GASOLINE	#10 - 1,000 #2 FUEL TANK
#3 - 6,000 UGST DIESEL	#11 - 4,000 COOKER TANK
#4 - 2,000 AGST DIESEL	#12 - 9,000 TANKER TRAILER
#5 - 3,000 OIL TRAP	#13 - 20,000 USED OIL TANK
#6 - 5,500 OIL WATER SEP.	#14 - 5,000 #2 DIESEL
#7 - 1,000 STG. TANK	#15 - 3,000 LEADED GASOLINE
#8 - 8,000 STG. TANK	

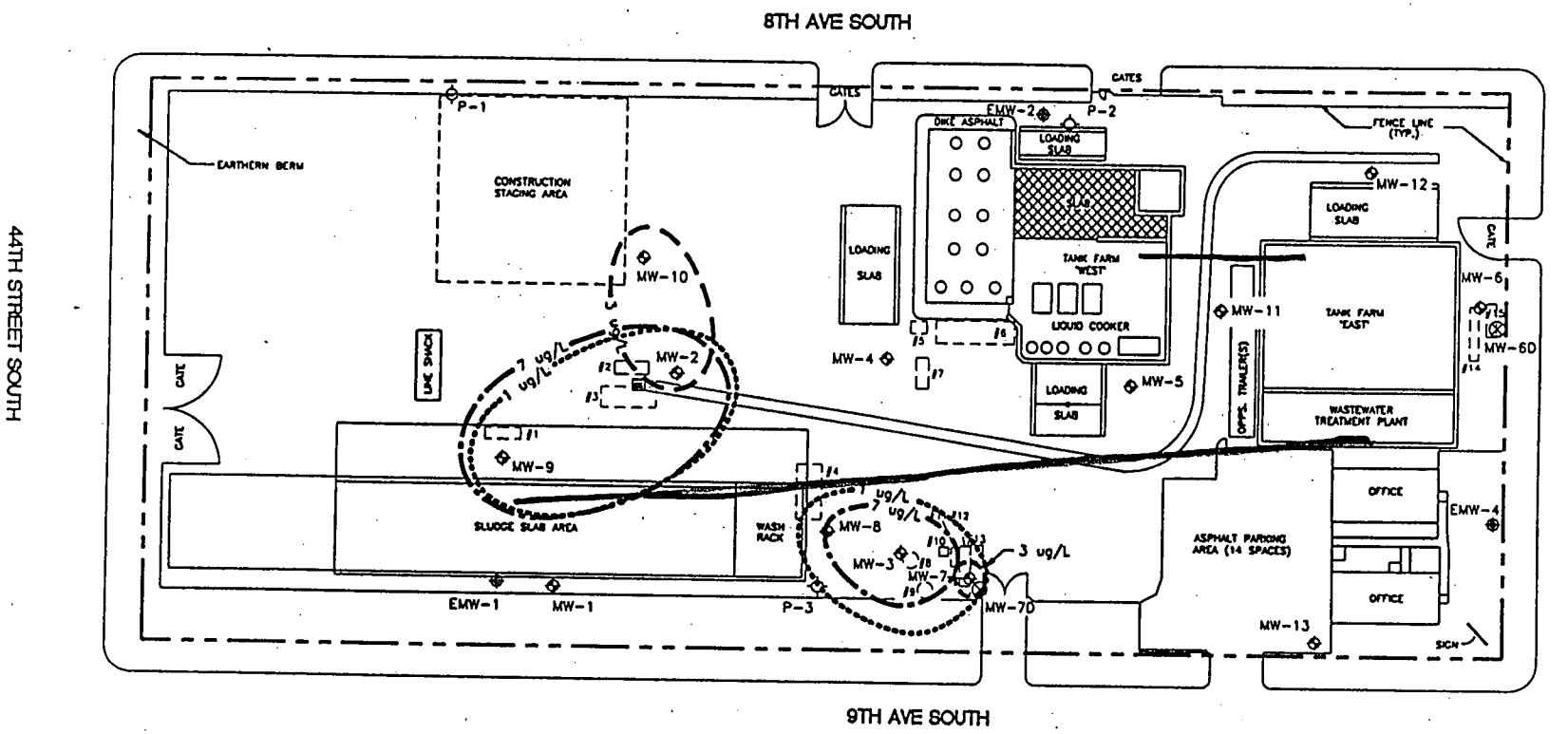
LEGEND

- PROPERTY BOUNDARY LINE
- SOIL BORING LOCATION
- DEEP SOIL BORING LOCATION
- APPROXIMATE EXTENT OF EXCESSIVELY CONTAMINATED SOIL (>50 ppm MIXED PRODUCT)
- MONITORING WELL LOCATION
- FORMER STORAGE TANK LOCATION
- NOTE: LOCATIONS OF FORMER TANKS ARE APPROXIMATE
- CONCRETE DRAINAGE SWALE AND DRAIN

APPROXIMATE Scale: 1"=80'

G[illegible]16.82\CONTAM 04-19-96 DS

FIGURE 9A
GROUNDWATER QUALITY SUMMARY MAP (PCE, 1,1-DCE, and VINYL CHLORIDE)
HOWCO ENVIRONMENTAL SERVICES, INC.
ST. PETERSBURG, FLORIDA



TANK CALLOUTS/ CAPACITY IN GALLONS	
#1 - 1,000 AGST GASOLINE	#9 - 10,000 STG. TANK
#2 - 2,000 UGST GASOLINE	#10 - 1,000 #2 FUEL TANK
#3 - 6,000 UGST DIESEL	#11 - 4,000 COOKER TANK
#4 - 2,000 AGST DIESEL	#12 - 9,000 TANKER TRAILER
#5 - 3,000 OIL TRAP	#13 - 20,000 USED OIL TANK
#6 - 5,500 OIL WATER SEP.	#14 - 5,000 #2 DIESEL
#7 - 1,000 STG. TANK	#15 - 3,000 LEADED GASOLINE
#8 - 8,000 STG. TANK	

LEGEND

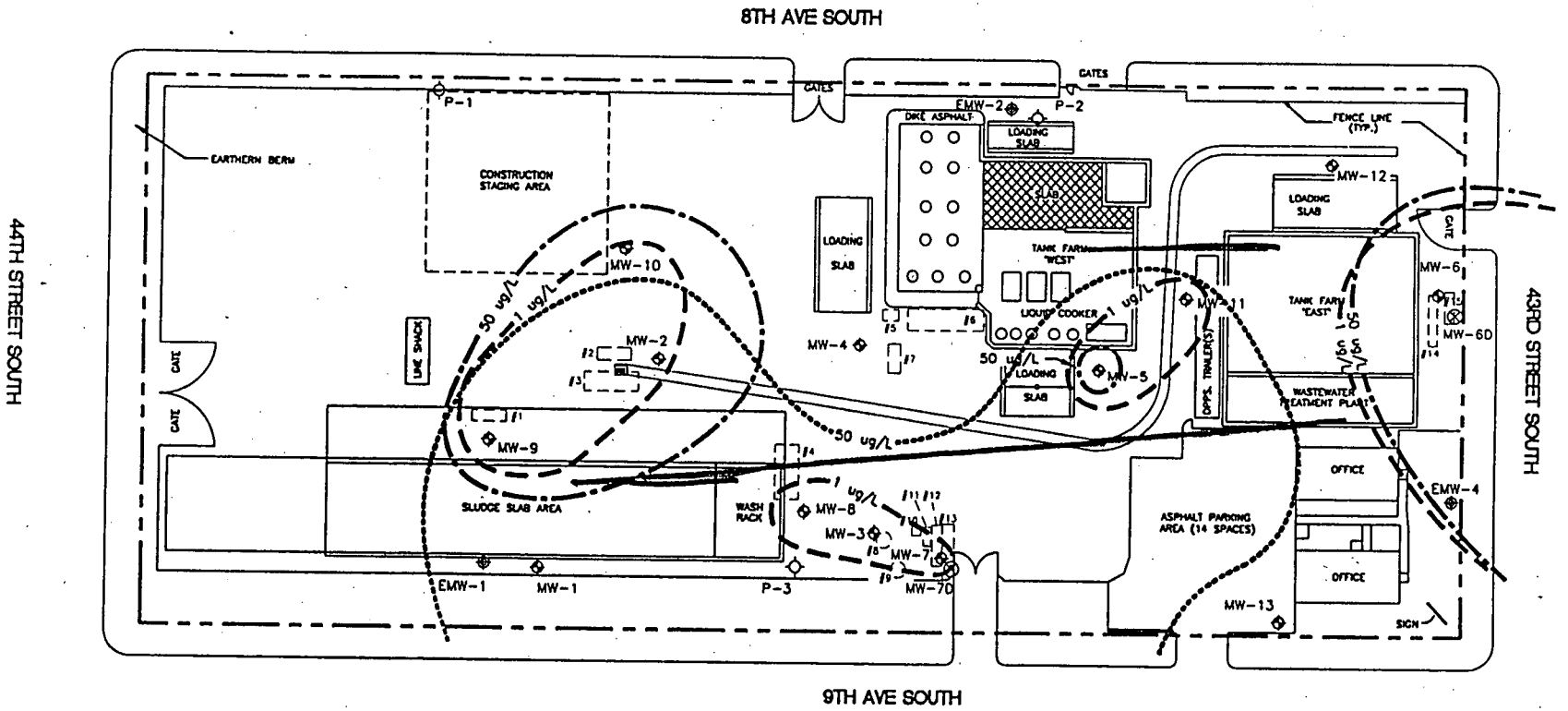
- EXISTING MONITORING WELL INSTALLED BY OTHERS
- MONITORING WELL INSTALLED BY FGS, INC.
- PIEZOMETER LOCATION
- DEEP WELL LOCATION
- CONCRETE DRAINAGE SWALE AND DRAIN
- PROPERTY BOUNDARY LINE
- FORMER STORAGE TANK LOCATION
- PCE
- 1,1-DCE
- VINYL CHLORIDE

APPROXIMATE Scale: 1" =80'

NOTE: LOCATIONS OF FORMER TANKS ARE APPROXIMATE.

10.81\QUALITY1 03-29-96 DS

FIGURE 9B
GROUNDWATER QUALITY SUMMARY MAP (BENZENE, TOTAL VOA's, and MTBE)
HOWCO ENVIRONMENTAL SERVICES, INC.
ST. PETERSBURG, FLORIDA



TANK CALLOUTS/ CAPACITY IN GALLONS	
#1 - 1,000 AGST GASOLINE	#9 - 10,000 STG. TANK
#2 - 2,000 UGST GASOLINE	#10 - 1,000 #2 FUEL TANK
#3 - 6,000 UGST DIESEL	#11 - 4,000 COOKER TANK
#4 - 2,000 AGST DIESEL	#12 - 9,000 TANKER TRAILER
#5 - 3,000 OIL TRAP	#13 - 20,000 USED OIL TANK
#6 - 5,500 OIL WATER SEP.	#14 - 5,000 #2 DIESEL
#7 - 1,000 STG. TANK	#15 - 3,000 LEADED GASOLINE
#8 - 8,000 STG. TANK	

LEGEND

- EXISTING MONITORING WELL INSTALLED BY OTHERS
- MONITORING WELL INSTALLED BY FGS, INC.
- PIEZOMETER LOCATION
- DEEP WELL LOCATION
- CONCRETE DRAINAGE SWALE AND DRAIN
- PROPERTY BOUNDARY LINE
- FORMER STORAGE TANK LOCATION
- BENZENE
- TOTAL VOA's
- MTBE

APPROXIMATE Scale: 1"=80'

NOTE: LOCATIONS OF FORMER TANKS ARE APPROXIMATE.

Department of Environmental Protection

Jeb Bush
Governor

Southwest District
3804 Coconut Palm Drive
Tampa, Florida 33619

David B. Struhs
Secretary

June 16, 1999

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

RE: Howco Environmental Services
EPA ID No. FLD 152 764 767
Pinellas County
OGC Case No. 97-2190

Dear Mr. Hagan:

Enclosed is the executed Consent Order in the above-referenced case. Please note the following compliance dates and actions required of Howco Environmental Services by conditions of the Consent Order:

1. The initial penalty installment payment of $1762.50 is due within 30 days of the effective date of the Consent Order. Eleven additional installment payments of $1762 50 each will be due by the last day of each following month.
2. Notification is due to the Department within 60 days of the effective date, along with the information specified in paragraph 9.a., if you intend to implement the pollution prevention project of replacing the specified underground piping at the facility with double-walled piping. If you choose not to implement the project, then a $5000.00 payment towards the civil penalty, in addition to the payments specified above, will be due within 90 days of the effective date.
3. Sampling of the wastewater treatment sludge and "OES" for TCLP analysis shall be performed within 30 days of the effective date. After the initial sampling, at least three additional quarterly analyses of these waste streams shall be performed and annual analyses thereafter. Verbal notification to the Department is required at least three days prior to each scheduled sampling event.
4. Within 60 days of the effective date pressure test the underground piping running between the sump and the storage tank in containment area #3, and within 120 days of the effective date provide certification to the Department that all the requirements specified in paragraph 10.b.(1) have been met for providing secondary containment for used oil containers, or ensure that all containers of used oil are stored within secondary containment structures consisting of a dike, berm or retaining wall and a floor that are impervious to used oil.
5. Within 30 days of the deadline after each task for upgrading the used oil tank secondary containment structures as specified in paragraphs 10.b.(2) through 10.b.(5), provide certification by a P.E. to the Department in accordance with the requirements of paragraph 10.b.(6).
6. Within 60 days of the effective date perform pressure testing on all underground piping in use for conveying used oil and/or PCW.

7. Within 21 days of the effective date publish the notice specified in paragraph 19 and provide proof of publication to the Department within 7 days after publication.

Compliance with the conditions of the Consent Order will end this enforcement case. If you have any questions, please contact me at (813) 744-6100, extension 387.

Sincerely,

Randall H. Strauss
Environmental Specialist II
Division of Waste Management

Enclosure

cc: Agusta Posner, OGC
Laurel Lockett, Carlton Fields
Susan Pelz, Solid Waste Permitting-SWD
Morgan Leibrandt, HWR-Tallahassee
Charlie Ryburn, Pinellas Co. DEM

BEFORE THE STATE OF FLORIDA
DEPARTMENT OF ENVIRONMENTAL PROTECTION

STATE OF FLORIDA DEPARTMENT OF ENVIRONMENTAL PROTECTION, Complainant, vs. Hagan Holding Company d/b/a Howco Environmental Services Respondent.	IN THE OFFICE OF THE SOUTHWEST DISTRICT OGC FILE NO. 97-2190 6-16-99

CONSENT ORDER

This Consent Order is entered into between the State of Florida Department of Environmental Protection ("Department") and Hagan Holding Company ("Respondent") to reach settlement of certain matters at issue between the Department and Respondent.

The Department finds and the Respondent neither admits nor denies the following:

1. The Department is the administrative agency of the State of Florida charged with the duty to administer and enforce the provisions of the Florida Air and Water Pollution Control Act, Sections 403.011, et seq., and the Florida Resource Recovery and Management Act, Sections 403.702, et seq., Florida Statutes ("F.S."), and the rules promulgated thereunder, Florida Administrative Code ("F.A.C.") Chapter 62-730. Respondent admits the Department has jurisdiction over the matters addressed in this Consent Order; provided, however, Respondent does not admit, accept, concede, or acknowledge the determinations, allegations, findings of fact and conclusions

of law made by the Department in this Consent Order, and specifically reserves the right to contest any determinations, allegations, findings, and conclusions in any proceeding regarding Respondent, or regarding the Facility (as defined in paragraph 3 below), other than actions brought by the Department to enforce the Consent Order. Furthermore, Respondent does not admit liability under any statutory or common law for the matters specified in the Consent Order. Notwithstanding the foregoing, Respondent agrees to be bound by all of the terms and conditions of this Consent Order.

2. Respondent is a person within the meaning of Sections 403.031(5), and 403.703(4) F.S.

3. Respondent is a Florida Corporation d/b/a Howco Environmental Services which owns and operates a used oil and industrial wastewater treatment, disposal and recycling facility ("Facility"). The Respondent's Facility is located at 843 43rd St. S., St. Petersburg, Pinellas County, Florida.

4. The Department conducted a hazardous waste and used oil compliance inspection of the Facility on October 16 & 17, 1996. At the inspection, the Department noted the following alleged violations:

a. 40 Code of Federal Regulations ("CFR") 262.11 Failure to determine if solid wastes added to the bulk pile meet the definition of hazardous waste at the point of generation.

b. 40 CFR 263.20 & 403.727(3)(b)5., F.S. Failure to use a manifest in the transportation of hazardous waste anti-freeze.

c. 40 CFR 279.52(a)(1) Failure to maintain and operate the facility to minimize the possibility of a release of used oil to the soil.

d. 40 CFR 279.52(b)(2)(iii)&(iv) Failure to describe arrangements with local authorities and locations of all emergency equipment in the contingency plan.

e. 40 CFR 279.52(b)(3)(ii) Failure to submit copies of the contingency plan to local police, fire, hospital and emergency response teams.

f. 40 CFR 279.54(a) Failure to store used oil in tanks, containers or hazardous waste management units.

g. 40 CFR 279.54(c) Failure to provide impervious secondary containment for containers of used oil.

h. 40 CFR 279.54(d) Failure to provide impervious secondary containment for existing aboveground tanks.

i. 62-710.850(6)(a), F.A.C. Failure to store used oil filters in sealed, labeled containers on an oil-impermeable surface.

j. 403.413(4)(c), F.S. Disposal of wastewater treatment sludge at a soil thermal treatment facility in violation of Department rules.

k. 403.727(3)(b)1., F.S. Transportation of hazardous waste to an unpermitted facility.

l. 403.727(3)(b)2., F.S. Storage, treatment and disposal of hazardous waste at an unpermitted facility.

Respondent has disputed the allegations of the Department as set forth in its written submittals to the Department and in discussions with Department representatives.

5. The Department conducted a hazardous waste and used oil compliance inspection of the Facility on September 29 & 30, 1998, and noted continuing alleged violations of the Department rules cited above in paragraphs 4.a., 4.g. and 4.h. In addition the Department noted an alleged violation of Rule 62-710.800(5), F.A.C.: failure to keep records in the facility operating record of monthly leak detection monitoring performed in accordance with 62-762.600, F.A.C., for integral piping in contact with the soil. Respondent has disputed the Department's contention that such standards are applicable to the Facility as set forth in its written submissions to the Department and in discussions with Department representatives.

6. Respondent is a used oil processor within the meaning of 40 CFR 279, adopted by reference in Chapter 62-710, F.A.C.

7. On July 16, 1997, October 16, 1998, December 18, 1998, and March 4, 1999, the Department and Respondent met to discuss these issues, and have had additional discussions of these matters by telephone.

Having reached a resolution of the matter, Respondent and the Department mutually agree and it is,

ORDERED:

8. In accordance with the terms hereof, Respondent shall pay the Department $26,150.00 in settlement of the matters addressed in this Consent Order. This amount includes $25,650.00 in civil penalties for alleged violations of Sections 403.161 and 403.727, F.S., and of the Department's rules; and $500.00 for costs and expenses incurred by the Department during investigation of this matter and the preparation and tracking of this Consent Order. Payment shall be made by cashier's check or money order. The instrument shall be made payable to the "Department of Environmental Protection" and shall include thereon the OGC number assigned to this Consent Order and the notation "Ecosystem Management and Restoration Trust Fund." The payment shall be sent to the Department of Environmental Protection, 3804 Coconut Palm Drive, Tampa, Florida 33619-8318. The settlement amount shall be paid in accordance with the following terms:

a. Twelve monthly installment payments shall be made of $1762.50 each, with the first payment due within 30 days of the effective date. The remaining eleven installment payments shall be due by the last day of each following respective month.

Storage Equipment Plan and Tables 3-1, 3-2 and 3-3, all dated December 29, 1998).

c. Within 90 days of the effective date and quarterly thereafter, Respondent shall provide the Department with Status Reports documenting the progress made on implementation of the project.

d. Within 30 days of completion of the project, Respondent shall notify the Department and submit documentation that the project was completed in accordance with paragraph 9.b. above, along with documentation of the actual costs incurred by Respondent to complete the project.

e. The Department shall review the documentation provided in accordance with paragraph 9.d. and will notify Respondent in writing if the project meets the requirements of paragraph 9.b. and if so, the costs allowable toward penalty offset and any remaining balance owed by Respondent.

f. No credit shall be allowed for costs associated with the replacement of any piping that has an internal diameter of 3 inches or less.

g. If the allowable costs are less than $5000.00, Respondent shall submit payment of the balance to the Department within 30 days of receiving the notification described in paragraph 9.e.

h. If after Respondent has notified the Department in accordance with paragraph 9.a. of its intent to implement the project, Respondent fails to meet any of the reporting deadlines specified in this paragraph, or terminates the project before the completion deadline, or fails to complete the project within 18 months of the effective date; then Respondent shall submit payment of $5000.00 to the Department within 30 days of notification from the Department that payment

(a)

is due. This payment shall be in addition to those payments specified in paragraph 8.a., and will apply toward the total civil penalty and costs owed of $26,150.00.

10. Respondent shall immediately upon the effective date and forthwith comply with all applicable requirements of Chapter 403, Florida Statutes, 40 CFR, Parts 260-266, 268, and 279, adopted by reference in Chapters 62-710 and 62-730, F.A.C. Respondent shall correct and redress all outstanding violations listed below in the specified manner within the stated time periods. All time periods shall run from the effective date.

a. **40 CFR 262.11** Failure to determine if solid wastes added to the bulk pile meet the definition of hazardous waste at the point of generation.

The Department and Respondent agree that wastewater treatment sludge ("WWTS") generated from Facility operations at the sludge press (as identified on Exhibit I) and that Respondent intends to dispose off-site with no further processing at the Facility (other than mixing with soil or other material for the purpose of absorbing liquid) shall be sampled and analyzed in accordance with the requirements of paragraphs 10.a.(1) through 10.a.(5) below.

(1) Within 30 days of the effective date, Respondent shall cause a qualified professional trained in sampling techniques ("sampling professional") to take a composite sample, consisting of at least six sub-samples, of WWTS contained in the dump hopper. The sample shall be taken when the dump hopper is at least half-full and be taken directly from the hopper before the waste is commingled with any other materials or waste streams. The WWTS in the hopper at the time samples are taken shall be defined as a "WWTS batch." The WWTS batch shall be uniquely identified by Respondent and tracked on all

chain-of-custody and other documentation concerning the sampling and analysis. The sample shall be delivered to a chemical analytical laboratory for analysis. The laboratory must be a "qualified laboratory," that is, have a Department-approved Comprehensive Quality Assurance Plan (CompQAP), and be approved for Toxicity Characteristic Leaching Procedure, EPA Method 1311 ("TCLP"), for all parameters listed in Table 1 of 40 CFR 261.24 ("toxic contaminants"). Within the sample-holding time limit, the sample shall be analyzed by TCLP for all toxic contaminants.

(2) Within 60 days of the effective date Respondent shall submit to the Department a laboratory report documenting the results of the sampling and analysis performed in accordance with paragraph 10.a.(1).

(3) Three additional WWTS samples shall be taken and analyzed as described above at approximately equal and regular intervals spaced over a period of one year following the initial sample.

(4) Following the completion of the initial sequence of four scheduled analyses, not including any analyses performed in accordance with paragraph 10.a.(6) below, the WWTS shall continue to be analyzed at a minimum frequency of once per year in the same manner as described above.

(5) Although generated at two different Facility process units, the waste solids generated at the cone-bottom tank (Tank No. 110) and at the oily solids batch treatment tank (Tank No. 111), as identified on Drawing D-8-1 and Table 3-3 of Exhibit I, are agreed by the Department and Respondent to constitute the same waste stream. The oily solids batch treatment tank and process is further described in the letter from Central Florida Testing Laboratories to Mr. Jerry Kissel attached and

incorporated herein as Exhibit II. This waste stream is generated from Respondent's processing of waste sludges that typically contain recoverable petroleum constituents, but their exact composition is not precisely known because they come from many different facilities and are derived from a variety of sources and processes; including oil/water separators, storage tank clean-outs, car and truck wash holding tanks, waste sump and trench clean-outs, etc. Wastes generated by the Respondent from processing used oil are also processed in these units. As used in this Order this waste stream shall be identified as oil-extracted sludge ("OES"). The generation of OES is agreed to occur at the time and point at which solid waste is removed from either process unit, and Respondent intends to dispose of the waste off-site with no further processing at the Facility, other than mixing the waste with soil or other material for the purpose of liquid absorption. OES shall be sampled at a point after it is removed from either process unit and before mixing with any other material, and shall be analyzed and managed in the same manner and within the time frames specified for WWTS in paragraphs 10.a.(1) through 10.a.(4) above. For the purposes of the sampling hereunder, an "OES batch" shall be defined as any amount over 55 gallons and less than the capacity of the unit removed on the same day from either process unit. The initial sample may be taken from an OES batch generated at either process unit at Respondent's discretion. Consecutive samples shall be taken alternately from the two process units.

(6) If any of the toxic contaminant Regulatory Levels (as defined in 40 CFR 261.24 Table 1) are exceeded on any TCLP analysis performed in accordance with paragraphs 10.a.(1) through 10.a.(5), then all WWTS or OES from the batch sampled

must be managed in compliance with all hazardous waste requirements per Chapter 62-730, F.A.C. Respondent shall segregate, uniquely identify and store each WWTS and OES batch sampled in a labeled container at the Facility until the analytical results are received and reviewed to determine if the waste must be managed as hazardous waste. Following the receipt of analytical results that indicate a batch of WWTS or OES exceeds any Regulatory Levels, all WWTS or OES generated subsequently, as applicable, will be accumulated in discrete batch amounts as defined in paragraphs 10.a.(1) and 10.a.(5), and shall be managed in compliance with all hazardous waste requirements per Chapter 62-730, F.A.C., until and unless none of the Regulatory Levels are exceeded as determined by analysis of two consecutive batches of the applicable waste.

(7) On and after the effective date, Respondent shall cause a sampling professional to sample each discrete batch of the following wastes at the point of generation prior to mixing with any other material: spent carbon and sand filtration media, and any other solid waste stream generated by the used oil and wastewater plants, other than the waste streams identified in this Order as WWTS, OES, tank bottom sludge and screen filter residue. Each sample shall be analyzed by a qualified laboratory using the TCLP procedure for all toxic contaminants. Respondent shall submit the laboratory results to the Department as soon as the data is available. If any of the toxic contaminant Regulatory Levels are exceeded for any waste, then that waste must be managed in compliance with all applicable hazardous waste requirements per Chapter 62-730, F.A.C.

(8) All waste solids generated from cleaning the vibratory screen filter in the used oil processing plant shall be placed

(b)

b. **40 CFR 279.54(c)** Failure to provide impervious secondary containment for containers of used oil.

40 CFR 279.54(d) Failure to provide impervious secondary containment for existing aboveground tanks.

The Department acknowledges that Respondent has been in the process of upgrading secondary containment at the Facility since June 1998. Respondent shall immediately upon the effective date continue to implement the following schedule to meet the standards specified in 40 CFR 279 and Chapters 62-710 (including referenced sections of 62-762) and 62-761, F.A.C., to upgrade the secondary containment for the Facility container storage areas, storage tank farms and associated underground piping:

(1) by 120 days from the effective date, provide secondary containment meeting the requirements of 40 CFR 279.54(c) for all areas where containers of used oil are stored. The pad, collector channel and sump system described in the attachment labeled as Exhibit III (the feature described as the "trench" in Exhibit III is referred to as the "collector channel" in this Order) shall be deemed to meet this requirement provided certification is provided pursuant to paragraph 10.b.(6) that all of the following requirements are met:

(A) the portions of the pad, collector channel and sump that are designated as part of the containment system are identified on Exhibit I as the "Used Oil Container Storage Area." The entire designated area drains only into the collector channel and sump, and

(B) the only substances other than stormwater that are routinely managed in the collector channel and sump are wastewater generated from the truck wash and sludge filter press, and upon generation the wastewater is immediately and

continuously pumped from the collector channel and sump to the designated tank in the wastewater treatment plant containment area, and

(C) the pad, collector channel and sump are certified to be sufficiently impervious to used oil to prevent any used oil released onto the pad and into the collector channel and sump from migrating to the soil, groundwater, or surface water, and

(D) the underground piping from the sump to the storage tank is pressure tested as specified in paragraph 10.c.(1) below within 60 days of the effective date and is repeated annually thereafter unless the piping is replaced with double-walled piping that is monitored monthly for leak detection, or unless the piping is closed in accordance with the requirements of 62-761.800, F.A.C. If the piping is determined to be leaking or in need of repair, it shall be repaired in accordance with the requirements of Rule 62-761.700, F.A.C., or replaced with double-walled piping that is monitored monthly for leak detection.

(E) If not all of the requirements of paragraph 10.b.(1)(A) through (D) are met within 120 days of the effective date and so certified pursuant to paragraph 10.b.(6), then by that date all containers used to store or process used oil (except for the tanks to be provided with secondary containment in accordance with the provisions of paragraphs 10.b.(2) through (4)) must be stored within a secondary containment system consisting of a dike, berm or retaining wall, and a floor that are sufficiently impervious to used oil to prevent the release of oil to the soil, groundwater or surface water.

(F) The Department and Respondent agree that the "Used Oil Container Storage Area" will satisfy the requirements of

secondary containment for used oil container storage if the provisions of paragraphs 10.a.(1)(A) through (D) are implemented, but will not meet the secondary containment requirements for used oil storage tanks.

(2)(A) By March 1, 1999, remove the asphalt berm and replace with a secondary containment structure meeting the requirements of 40 CFR 279.54(d) in the northern portion of the tank farm storage area identified as "containment area 2" on Exhibit I.

(B) Within 120 days of the effective date, remove the asphalt berm and replace with a secondary containment structure meeting the requirements of 40 CFR 279.54(d) in the southern portion of the tank farm storage area indentified as "containment area 2" on Exhibit I.

(3) Within 60 days of the effective date provide secondary containment meeting the requirements of 40 CFR 279.54(d) for Tank #111, the oily solids batch treatment tank, and Tank #110, the cone-bottom tank, as identified on the drawing attached as Exhibit I.

(4)(A) Within 6 months of the effective date, apply a coating or otherwise modify the secondary containment areas identified in Exhibit I as containment area #2, so that the containment is "impervious." As used in this Order the tank containment structures are deemed to be "impervious" if they are constructed of or coated with a material that is compatible with the stored substance and that has a permeability rate to the substance stored of 1×10^{-7} cm/sec or less; or for concrete structures, a material that meets the design and construction standards of ACI 350R-89 and ACI 224R-89; or is applied to the concrete in accordance with NACE International Standard RP0892-92.

(B) By January 1, 2000, apply a coating or otherwise modify the secondary containment areas identified in Exhibit I as containment area #1, so that the containment is impervious.

(C) By June 1, 2000, apply a coating or otherwise modify the secondary containment areas identified in Exhibit I as containment area #3, so that the containment is impervious. Respondent's compliance with the deadline date of this paragraph will satisfy Respondent's requirement to provide impervious secondary containment for used oil processing tanks located within containment area #3. Respondent acknowledges that the deadline date of June 1, 2000, applies only to used oil processing tanks located within containment area #3. The deadline date for providing impervious secondary containment for used oil storage tanks located within containment area #3 that are also regulated by the Department's Pollutant Storage Tank Program is January 1, 2000. Respondent acknowledges that the Department is not precluded by any of the terms of this Order from initiating an enforcement action to ensure compliance with the secondary containment requirements, and any other requirements for storage tanks at the facility regulated by the Department's Pollutant Storage Tank Program.

(5) By December 31, 1999, all storage tank secondary containment structures at the Facility shall have a capacity of at least 110% of the volume of the largest tank contained within the structure.

(6) All upgrades specified in paragraphs 10.b.(1) through 10.b.(5) shall meet the applicable standards of 40 CFR 279 and Chapters 62-710 (including the referenced sections of 62-762) and 62-761, F.A.C. Respondent shall provide certification by a Professional Engineer of all engineering aspects applicable to each task as listed on the Department's "Application Form for a

Used Oil Processing Permit," DEP Form #62-710.901(d). The certification, along with applicable supporting documents and drawings demonstrating the upgrades, shall be submitted on the specified form to the Southwest District Hazardous Waste Permitting Section within 30 days of completion of each item. (c)

c. **Rule 62-710.800(5), F.A.C** Failure to perform monthly leak detection monitoring for underground piping in accordance with Rule 62-762.600, F.A.C., and keep records of the monitoring in the Facility's operating record.

(1) Within 60 days of the effective date, Respondent shall perform a pressure test in accordance with API RP 1110, or equivalent method, on all underground piping used for conveying used oil and/or PCW. If any piping is determined to be leaking or in need of repair, it shall be repaired in accordance with the requirements of Rule 62-761.700, F.A.C., or replaced with double-walled piping.

11. The Department acknowledges that Respondent's implementation of the Facility upgrades in accordance with the terms of paragraph 10.b. will satisfy the Facility improvements necessary to meet the current State requirements for secondary containment applicable to used oil processors. Respondent's Used Oil Permit may be issued with specific conditions that Respondent's implementation of the schedule of improvements contained in paragraph 10.b. will satisfy current permit requirements for secondary containment. The parties acknowledge that the Facility could become subject to other requirements for secondary containment not specified herein, if required by Statute or Rule enacted or adopted subsequent to the effective date of this Order.

12. Respondent agrees to pay the Department stipulated penalties in the amount of $100.00 per day for each and every

pursuant to Sections 120.69 and 403.121, Florida Statutes. Failure to comply with the terms of this Consent Order shall constitute a violation of Section 403.727(1)(a), Florida Statutes.

18. Respondent is fully aware that a violation of the terms of this Consent Order may subject Respondent to judicial imposition of damages, civil penalties of up to $50,000 per offense, and criminal penalties.

19. Respondent shall publish the following notice in a newspaper of daily circulation in Pinellas County, Florida. The notice shall be published one time only within 21 days after the effective date of the Consent Order. Respondent shall provide a copy of such publication to the Department's Southwest District Office within 7 days after publication.

STATE OF FLORIDA DEPARTMENT OF ENVIRONMENTAL PROTECTION
NOTICE OF CONSENT ORDER

The Department of Environmental Protection gives notice of agency action of entering into a Consent Order with Hagan Holding Company d/b/a Howco Environmental Services pursuant to Section 120.57(4), Florida Statutes. The Consent Order addresses waste management practices and environmental protection standards for the wastewater treatment and used oil recycling facility located at 843 43rd St. S., St. Petersburg, Pinellas County, FL. The Consent Order is available for public inspection during normal business hours, 8:00 a.m. to 5:00 p.m., Monday through Friday, except legal holidays, at the Department of Environmental Protection, 3804 Coconut Palm Drive, Tampa, Florida.

Persons whose substantial interests are affected by this Consent Order have a right to petition for an administrative hearing on the Consent Order. The Petition must contain the information set forth below and must be filed (received) in the Department's Office of General Counsel, 3900 Commonwealth Boulevard, MS-35 Tallahassee, Florida 32399-3000, within 21

EXHIBIT I

TABLE 3-1

STORAGE TANKS IN THE OIL PROCESSING PLANT

TANK NUMBER	DIAMETER INCHES	LENGTH INCHES	CAPACITY IN GALLONS	HORIZ	VERT	PRODUCT*
100	144	430	30,300	X		used oil treatment tank
101	144	409	28,800	X		used oil treatment tank
130	96	254	7,950	X		oil receiving
131	64	285	3,950	X		oil receiving
132	64	285	3,950	X		oil receiving
133	64	285	3,950	X		oil receiving
134	64	285	3,950	X		screened oil
135	96	192	6,000	X		light ends, condensate
136	120	205	10,000	X		light ends
137	120	216	10,570	X		burner fuel oil
170	125	210	11,150		X	used oil, water soluble oil, antifreeze or waste water
171	108	272	10,780		X	used oil, water soluble oil, antifreeze or waste water
172	96	324	10,140		X	used oil, water soluble oil, antifreeze or waste water
173	102	168	5,940		X	untreated oil

Note: The above tanks are in containment area 1. Total storage tank capacity within containment area 1 = 147,430 gallons. Containment area 1 holds 77,130 gallons

120*	146	383	27,740	X	processed oil
121	144	422	29,730	X	processed oil
122	144	422	29,730	X	processed oil
123	144	422	29,730	X	processed oil
124	144	422	29,730	X	processed oil
125	114	435	19,210	X	processed oil
126	128	374	20,820	X	processed oil
127	126	361	19,470	X	processed oil
128	150	337	25,760	X	processed oil
129	126	435	23,460	X	processed oil

Note: * - Tank 120 was replaced. The above tanks are in containment area 2. Total storage tank capacity within containment area 2 = 255,380 gallons. Containment area 2 holds 52,400 gallons.

*Products stored in various tanks may change from time to time.

TABLE 3-2

STORAGE TANKS IN THE WASTE WATER TREATMENT PLANT

TANK NUMBER	DIAMETER INCHES	LENGTH INCHES	CAPACITY IN GALLONS	HORIZ/VERT	PRODUCT*
105	125	290	15,390	X	used oil
106	95	323	9,900	X	water soluble oil
140	239	156	30,280	X	sump receiving
141	155	239	19,510	X	sump receiving
142	155	239	19,510	X	oil water separator tanks
143	125	353	17,860	X	oil water separator tanks
144	125	374	19,850	X	oil water separator tanks
150	125	374	19,850	X	treated water
151	125	374	19,850	X	treated water
152	144	421	29,670	X	treated water
153	170	431	21,090	X	treated water
154	114	434	19,160	X	treated water
155	120	431	21,090	X	untreated water
160	125	284	15,070	X	untreated wastewater
161	125	284	15,070	X	untreated wastewater
162	126	284	15,320	X	untreated wastewater
163	126	284	15,320	X	untreated wastewater
164	126	371	20,000	X	untreated wastewater
165	120	368	18,000	X	untreated wastewater
180	251	285	61,020	X	untreated water

The above tanks are in containment area 3. Total storage tank capacity within containment area 3 = 422,810 gallons. Containment area 3 holds 125,000 gallons.

166	130	373	21,420	X	treated water
191	120	209	10,232	X	treatment tank
192	144	146	10,293	X	treatment tank

Note: The above tanks are in containment area 4. Total storage tank capacity within containment area 4 = 41,945 gallons. Containment area 4 holds 46,000 gallons.

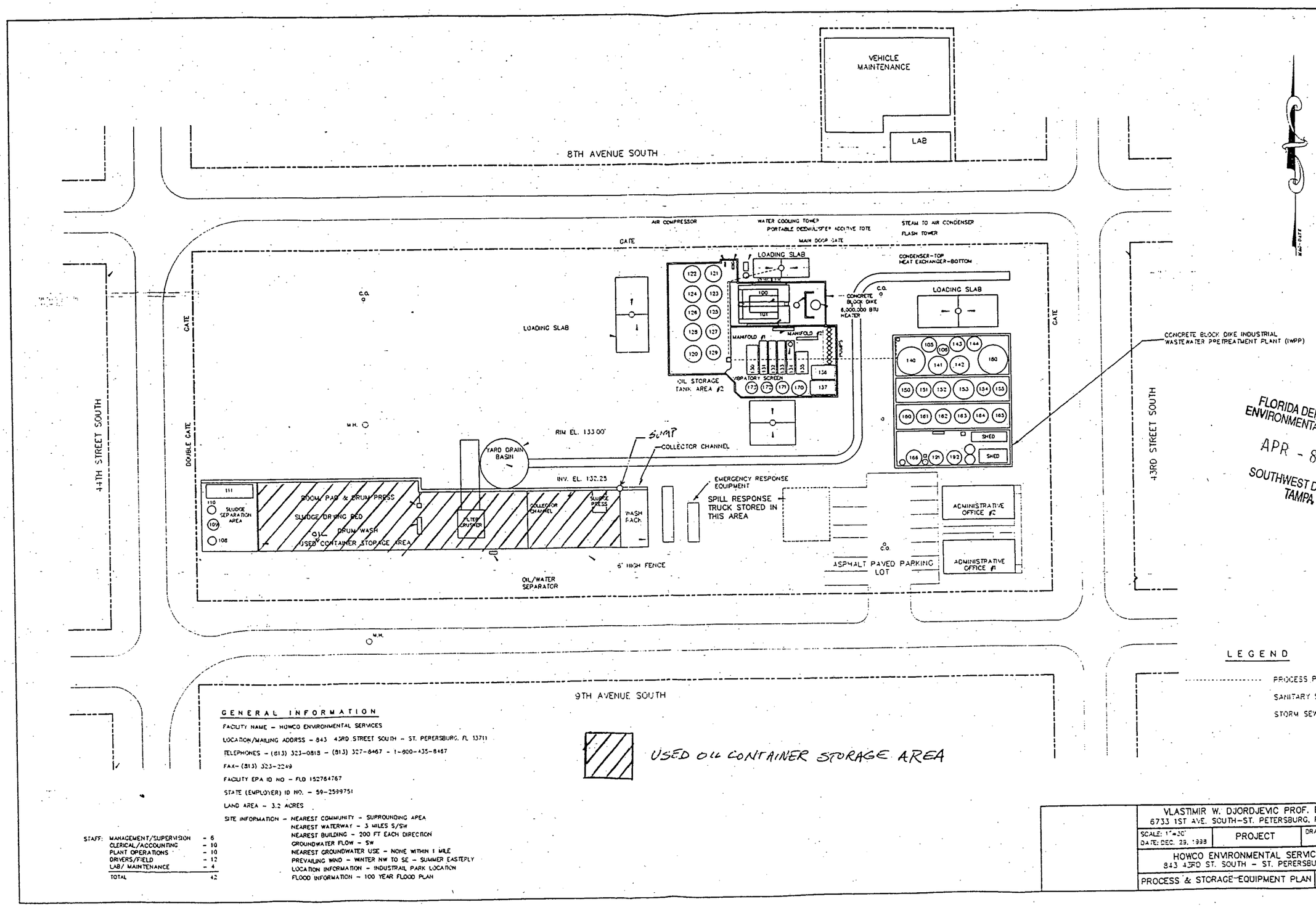
*Products stored in various tanks may change from time to time.

TABLE 3-3

STORAGE TANKS IN THE SLUDGE SEPARATION AREA

TANK NUMBER	DIAMETER INCHES	LENGTH INCHES	CAPACITY IN GALLONS	HORIZ/VERT	PRODUCT
108	120	204	9,980	X	IWPP Sludge Tank
109	78	156	3,225	X	Oil Filter Crusher Tank
110*	120	54 CYL. 90 CONE	6,415	X	Cone-Bottom Tank
111	120	396	19,380	X – INCLINED	Oily Solids Batch Treatment Tank (13.62% INCLINE)

Note: * - Tank 110 consists of a cylinder and cone section. The above tanks are in containment area 5. Total storage tank capacity within containment area 5 is 39,000 gallons. Containment area 5 holds 36,700 gallons.



FLORIDA DEPARTMENT OF ENVIRONMENTAL PROTECTION
APR - 8 1999
SOUTHWEST DISTRICT TAMPA

LEGEND

PROCESS PIPING
SANITARY SEWER
STORM SEWER

USED OIL CONTAINER STORAGE AREA

GENERAL INFORMATION

FACILITY NAME – HOWCO ENVIRONMENTAL SERVICES

LOCATION/MAILING ADDRSS – 843 43RD STREET SOUTH – ST. PERERSBURG, FL 33711

TELEPHONES – (813) 323-0813 – (813) 327-8467 – 1-800-435-8467

FAX– (813) 323-2249

FACILITY EPA ID NO – FLD 152764767

STATE (EMPLOYER) ID NO. – 59-2599751

LAND AREA – 3.2 ACRES

SITE INFORMATION – NEAREST COMMUNITY – SURROUNDING APEA
NEAREST WATERWAY – 3 MILES S/SW
NEAREST BUILDING – 200 FT EACH DIRECTION
GROUNDWATER FLOW – SW
NEAREST GROUNDWATER USE – NONE WITHIN 1 MILE
PREVAILING WND – WINTER NW TO SE – SUMMER EASTERLY
LOCATION INFORMATION – INDUSTRAIL PARK LOCATION
FLOOD INFORMATION – 100 YEAR FLOOD PLAN

STAFF:		
	MANAGEMENT/SUPERVISION	– 6
	CLERICAL/ACCOUNTING	– 10
	PLANT OPERATIONS	– 10
	DRIVERS/FIELD	– 12
	LAB/ MAINTENANCE	– 4
	TOTAL	42

VLASTIMIR W. DJORDJEVIC PROF. ENGR.
6733 1ST AVE. SOUTH–ST. PETERSBURG, FL. 33707

SCALE: 1"=30'
DATE: DEC. 29, 1998

PROJECT

DRAWN: G.C.R.

HOWCO ENVIRONMENTAL SERVICES
843 43RD ST. SOUTH – ST. PERERSBURG FL.

PROCESS & STORAGE-EQUIPMENT PLAN

D-8-1

C:\DRAWINGS\environ\howco.dwg Mon Apr 05 10:56:44 1999

Cent ' Florida Testing Laborato ,
Testing Development and Research
12625 - 40th STREET NORTH, CLEARWATER, FLORIDA 33762
PHONE: (813) 572-9797 TOLL FREE: 1-800-248-CFTL FAX (813) 299-0023

EXHIBIT II

5/22/98
L: J Robbins,
PCDEM

May 18, 1998

RECEIVED
MAY 19 1998
Department of Environmental Protection
SOUTHWEST DISTRICT
BY

Mr. Jerry Kissel, P.E.
State of Florida
Department of Environmental Protection
3804 Coconut Palm Drive
Tampa, Florida 33619

Subject: HOWCO Environmental Services
Material Recovery from sludge

Dear Mr. Kissell:

HOWCO Environmental Services is planning to set up and test a process to separate the oil and water from the non-hazardous sludge's received at this facility. The sludge's are generally collected from water and oil separators, fuel oil tanks, car wash pits, and other industrial cleaning operations.

The sludge material will be pumped into a 20,000 gallon tank. Batch size will be approximately 18,000 gallons. The material is heated to roughly 180 degrees Fahrenheit for about 4 hours. The material will be air mixed and agitated. A de-emulsifier will be mixed into the batch, and then it will be allowed to cool. The de-emulsifier promotes separation of the material into distinct layers of solids, oil, and water. The water and oil will be pumped off to the water treatment and used oil facilities on site for additional treatment. The solids will then be vibrated out of the tank for further treatment, testing, and disposal.

This letter is intended to address the potential air pollution from this process. Volatile organic compounds, and possibly hazardous air pollutants may be emitted during this heating portion of this operation. Enclosed please find a copy of an analysis of a typical sludge sample. Obviously, the constituents in each sludge sample will vary, so this letter will attempt to address higher concentrations than those shown on the enclosed analytical report.

Based on an 18,000 gallon batch size, a typical batch weight would be approximately 180,000 pounds or 90 tons.

(18,000 gallons)*(~10 pounds/gallon) = 180,000 pounds per batch (81,647 kg)

From the attached analysis, the highest single volatile constituent is MEK at 13,700 micrograms per kilogram (µg/kg). The total MEK for this batch would be about 2.5 pounds.

(81,647 kg)*(0.013700 g/kg) = 1,119 grams MEK per batch (2.47 pounds)

Assuming that 100% of the MEK is volatized over the four hour heating period, the MEK emission rate would be approximately 0.62 pounds per hour.

A maximum of 6 batches of material will be processed each month, for a total monthly MEK emission rate of about 14.8 lbs./month, (178 lbs/year).

(2.47 lbs/batch)*(6 batches/month) = 14.8 lbs/month

If the highest single constituent concentration were allowed to be 50,000 µg/kg, than the emissions of that pollutant would be:

9 lbs/batch
2.25 lb/hour
54 lbs/month
648 lbs/year (0.32 tons)

If the total 8010 and 8020 volatiles were allowed to be up to 100,000 µg/kg (100 mg/kg), than the VOC emissions would be:

18 lbs/batch
4.5 lb/hour
108 lbs/month
1296 lbs/year (0.65 tons)

HOWCO would like to set up a system as described above for research and development. If the operation works as planned, the process would become a permanent part of HOWCO's present operations.

HOWCO Environmental Services would like to know what permitting actions are required, if any, to setup up and test this system for R & D, and what permitting would be required, if any, should this operation become permanent.

In addition to the emissions from the sludge heating process, a small burner will be used to heat the tank, consuming approximately eleven gallons per hour of No. 2 diesel fuel. The burner emissions are assumed to be the typical AP-42 byproducts of combustion.

Please let us know what the FDEP will require prior to HOWCO initiating action on the project. If you have any questions regarding this inquiry please do not hesitate to contact our office.

Sincerely,

Central Florida Testing Laboratories, Inc.

Russell B. Keith

Russell B. Keith, E.I.
Environmental Engineer

RBK/rk
enclosures
copy to: Mr. Tim Hagan - HOWCO Environmental Services
Mr. Ernest M. Roggelin - Pinellas County Public Health Unit,
Engineering Dept.

EXHIBIT III

Description of Pad, Trench and Sump System located at Howco Facility

Howco Environmental Services
843 43rd St. S.
St. Petersburg, FL

A concrete pad of about 45 feet by 300 feet is located in the southwest corner of the Facility. One of the 300-foot edges of the pad is contiguous with a concrete block wall that forms a large part of the southern perimeter of the facility. The other 300-foot edge of the pad is bounded by an open trench that has been used for several years to collect drainage of stormwater, used oil, wastewater and spillage from containers, tanks and process operations located on the pad. The trench was in use to convey used oil and oily wastewater from the following tanks and operations at the time of a Department inspection conducted on September 29, 1998: 1) used oil was draining into the trench through a hose from a roll-off containing crushed oil filters, 2) oily wastewater was draining into the trench from the filter press, 3) oily wastewater was draining through a hose to the trench from a drum-washing rack. Liquids in the trench drain to a collection sump, which is also used to collect wastewater from the adjacent truck wash. Liquids that collect in the sump are pumped through an underground pipe to a tank located in the wastewater containment area in which oil/water gravity separation takes place, which is followed by further processing of the separated phases.

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION IV

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

JAN 2 2 1991

EXHIBIT IV

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

4WD-RCRA&FFB

Mr. William Church
General Manager
Howco Environmental Services
843 Forty-third Street, South
St. Petersburg, Florida 33711

RE: Receipt of Part A Application Pursuant to the Toxicity Characteristic (TC) Final Rule

Dear Mr. Church:

The purpose of this letter is to acknowledge receipt of the Part A application submitted by Howco Environmental Services.

The submittal is timely and complete. Effective September 25, 1990, Howco Environmental Services has interim status to manage the TC wastes described in the submittal. Howco Environmental Services must submit a Part B application when called upon to do so by EPA.

Interim status for TC wastes requires that Howco Environmental Services manage these wastes in compliance with all the applicable regulations in 40 CFR 265 until such time as a final decision is made on the completed hazardous waste permit application, which includes the Part B.

If you have any questions regarding this letter, please contact Ms. Lisa Perras of my staff at (404) 347-7603. Florida has not adopted the TC regulations as state law. Questions regarding state TC requirements should be directed to the Florida Department of Environmental Regulation.

Sincerely yours,

ORIGINAL
SIGNED BY

James H. Scarbrough, P.E., Chief
RCRA and Federal Facilities Branch
Waste Management Division

cc: Mr. Barry Swihart, Florida DER
Dr. Richard D. Garrity, Florida DER

EXHIBIT V

9453.1991(01)

RCRA/SUPERFUND HOTLINE MONTHLY SUMMARY

JUNE 1991

2. Withdrawal of an Interim Status Part A Permit Application

A generator is treating hazardous waste that exhibits a toxicity characteristic on-site in its 90-day accumulation tanks. Prior to the effective date of the Toxicity Characteristic rule, he/she filed a Part A application for 40 CFR Part 265 Interim Status. The generator subsequently discovered that a permit is not required for treatment in accumulation tanks provided that the tanks are operated strictly in compliance with all applicable standards referenced in 40 CFR 262.34. (51 FR 10168) What procedures should be followed for the Part A permit application to be withdrawn? Would the generator be subject to interim status standards until the application is withdrawn?

In an internal 1983 memorandum, EPA clarified the protective filer procedures for withdrawal of a Part A application. The memorandum stated that filings for facilities have not been regulated under interim status standards should be returned to the owner or operator, preferably after EPA has (1) obtained written confirmation that the facility was not subject to the permitting requirements, and (2) possibly conducted an investigation to verify the data.

Such a facility is not subject to the Part 265 standards until the application is withdrawn. Section 3005(e) of RCRA states that the interim status standards apply to any person who owns or operates a facility required to have a permit under that section. If the facility, in fact, has not managed hazardous waste in a manner that would subject it to regulations, then the Part 265 standards would not be applicable, even if a Part A permit application had been mistakenly submitted (as in the case of protective filers). Thus, the generator would not have to operate or close in accordance with interim status standards.

Source: Wayne Roepe/OSW (202) 475-7245
Research: Amy Norgren

```
AREA: SWD_______        Cash Receiving Application                    CRAF006A
                    Collection Point Log Remittance      Tot: _____$1,762.50
+-------------------------------------------------------------------------+
| SYS$REMT: 387030__ Type: CP___    Recved Date: 06-JUN-2000  Status: RECEIVED
| SYS$RCPT: 319690__ PNR: _______ Check #: 040781____ Amount: _____1,762.50
| SSN/FEI#: _________              Name: HOWCO_ENVIRONMENTAL_SERVICES__
|   First: _____________ Middle: _____ Title:_______ Suf: _____
| Address1: 3701_CENTRAL_AVENUE_____________________ Short Comments:
| Address2: _____________________________________ S-OGC_97-2190_HW_________
|    City: ST._PETERSBURG_____ ST: FL  Zip: 33713-____ Country: __________
+-------------------------------------------------------------------------+
+-------------------------> P A Y M E N T (S) <---------------------------+
|          Distr                                                          S |
|          CL     Object                    Payment                Applic/  T |
| SYS$PAYT Area.. Code/Description.....: Amount........ Reference#     Fund  A |
| 407027__ SWD___ 012008 LCT-PENALTIES__ _____$1,762.50 OGC97-2190 ___ ECOSYS CO |
| _______ _______ _______ _____________ _____________ __________ ___ _______ __ |
| _______ _______ _______ _____________ _____________ __________ ___ _______ __ |
| _______ _______ _______ _____________ _____________ __________ ___ _______ __ |
| _______ _______ _______ _____________ _____________ __________ ___ _______ __ |
+-------------------------------------------------------------------------+
 COMMIT FREQUENTLY                    _____$1,762.50  Payment total
Press_<TAB>_to_accept_Collection_Point_or_enter_F&A._____________________________
Count: *1                                                        <Replace>
```

Department of Environmental Protection

Jeb Bush
Governor

Southwest District
3804 Coconut Palm Drive
Tampa, Florida 33619

David B. Struhs
Secretary

September 5, 2000

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

Re: HOWCO Environmental Services
FLD 152 764 767
92465-HO06-001

Dear Mr. Hagan:

The purpose of this letter is to inform you that during a Department visit to HOWCO Environmental Services (HOWCO) on August 28, 2000, it was noted that HOWCO was in violation of one or more specific conditions of HOWCO's operation permit. Richard Dillen and David Roehm of your staff had previously contacted the Department both to inform us that the "additional study" is commencing and to notify us at least twenty-four hours in advance of each sampling event, as required by Specific Condition II.8.c., *Processed Used Oil Analysis Plan.*

This permit condition states that HOWCO shall sample and analyze every tank (batch) of used oil processed prior to shipping the processed oil off-site. On August 28, 2000, the contents of Tank 121 was sold and shipped off-site without completing the required analyses. Tank 121 was sampled on August 22, 2000, but because of problems with analytical equipment at the contract laboratory HOWCO uses (Precision Petroleum Labs, Inc., Houston, Texas), analysis of the sample for arsenic and polychlorinated biphenyls was not performed before this batch was sold.

It is clear from this incident that procedures are not in place to ensure that processed oil will not be sold or shipped off-site prior to determining if the processed oil meets the on-specification used oil fuel criteria. HOWCO must immediately initiate procedures to ensure an incident of this nature does not recur. Also, for the purpose of the study outlined in Specific Condition II.8.c., the processed oil from Tank 121 that was sampled on August 22, 2000, will not be included in the study.

Sincerely,

Stanley Tam

Stanley Tam
Professional Engineer II
Hazardous Waste Section

Department of Environmental Protection

Jeb Bush
Governor

Southwest District
3804 Coconut Palm Drive
Tampa, Florida 33619

David B. Struhs
Secretary

October 4, 2000

Ms. Laurel Lockett
Carlton Fields
P.O. Box 3239
Tampa, FL 33601-4133

Re: HOWCO Environmental Services
request for compliance assistance

Dear Ms. Lockett:

In regards to HOWCO's request for compliance assistance, Mr. Hagan and I had discussed this matter at length by telephone on September 15th. I stated that the Department would be happy to meet with HOWCO for an informal review of permit related record keeping and other similar issues. The informal review is scheduled for 10 AM, October 11, 2000 at HOWCO's administrative office.

However, I conveyed to Mr. Hagan that this "informal review" does not fall under the Hazardous Waste Section's "Compliance Assistance" program. This program is intended for small facilities in certain industrial sectors that do not have the resources or expertise to fully comply with the applicable regulations. It is not intended for permitted facilities. I also mentioned that he may wish to look into the Department's self audit policy.

In addition, I stated that the informal review is not linked in any way to any compliance inspection(s). Major violations discovered during a compliance inspection cannot be "negated" by the informal review. HOWCO's annual compliance inspection was scheduled months ago for September 19, 2000 and was performed on that date. None the less, permit related record keeping was not the focus of the inspection.

If you or Mr. Hagan wishes to discuss this matter further, please contact me at (813)744-6100, extension 390.

Sincerely,

Stanley Tam

Stanley Tam
Professional Engineer II
Hazardous Waste Section

cc: Tim Hagan, HOWCO

CARLTON FIELDS

ATTORNEYS AT LAW

ONE HARBOUR PLACE
777 S. HARBOUR ISLAND BOULEVARD
TAMPA, FLORIDA 33602-5799

MAILING ADDRESS:
P.O. BOX 3239, TAMPA, FL 33601-3239
TEL (813) 223-7000 FAX (813) 229-4133

September 26, 2000

Mr. Bill Kutash
Administrator, Waste Management
Florida Dept. of Environmental Protection
Southwest District
3804 Coconut Palm Drive
Tampa, FL 33619

Re: Howco/Compliance Assistance

Dear Bill:

Confirming our call a week or so ago, Howco believes that it has in place all of the record keeping and other matters related to compliance under the new Permit. Because so many operational and record keeping regimes are new under the Permit, we would like to arrange for an informal review of record keeping and related systems so that we are sure that both Howco staff and the Department are on the same page with respect to expectations regarding Permit implementation.

I understand that the Department has a program for such matters and that barring major enforcement issues (which we certainly do not expect), the inspection would not be for the purpose of enforcement activities. The last time I spoke with Tim Hagan he had not been contacted regarding a possible schedule. Please let us know when it might be convenient to arrange the walk-through so that we can make sure that Mr. Hagan and other appropriate management are available. Thanks for your help.

Yours sincerely,

Laurel Lockett

LL:bl
cc: Mr. Tim Hagan


9 17 '99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SLUDGE
108
DANGER
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USED
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114

TATE OF FLORIDA
EPARTMENT OF ENVIRONMENTAL PROTECTION

CHAIN OF CUSTODY RECORD

Page 1 of 1

PROJECT NAME	SUBMITTING AGENCY NAME	SUBMITTING AGENCY CODE
Howco Environmental	FDEP Southwest District	8040

AMPLER SIGNATURE(S): James Dregne

Q # -2000-05-08-25 MODULE # 3020

STATION/ LOCATION/ NUMBER	DATE M/D/Y	TIME #####	COMP/ GRAB	# OF CONTAINERS	PARAMETERS: TCLP-VOC	TCLP-BNA	TCLP-TR	TCLP-HG-H	Field ID #
FP-1	5/9/00	0750	GRAB	3	✓	✓	✓	✓	25938
CS-1	5/9/00	1005	GRAB	3	✓	✓	✓	✓	25939

	Date/ Time	Method of Dispatch:	Opened and Accepted by:	Date/ Time
ealed and Relinquished by: James Dregne	5/9/00 1300	FEDEX		
ealed and Relinquished by:	Date/ Time	Method of Dispatch:	Opened and Accepted by:	Date/ Time
ealed and Relinquished by:	Date/ Time	Method of Dispatch:	Opened and Accepted by:	Date/ Time

EMARKS:

Metals, Volatiles, Acid B/N Extr., Pesticides, PCB's, Nutrients, Wet Chem, Toxicity, Algal Assay, Chlorophyll, etc.

Florida Department of Environmental Protection

Central Laboratory Sample Submittal Form

Event ID *:

Request Number: RQ-2000-05-08-25

Howco Environmental Services

Customer: SW-DIST

Project ID: OTHER-WSM

PMAS:

Requester: Maria A Cantera

Collected By: JAMES DREGNE

Field Parameters Measured By:

Field Report Prepared By:

Send Final Report To: JAMES DREGNE

Lab ID *: FP-1 | Location: FP-1 | ☐ Comp ☒ Grab | Collection (begin) Date 5/9/00 Time 0958 Eastern Central | Collection (end) Date Time Eastern Central | Bottle Group(s) **: A

Field ID: 25938 | Tot Res Chlorine (mg/L) | Diss Oxygen (mg/L) | Storet Station Number

Matrix (Include type e.g. Salt, Fresh, etc) | Temp (C) | pH | Sample Depth ☐ m ☐ ft | ☐ Salinity (PPTh) ☐ Sp Conductance (umho/cm) | NPDES Number

Latitude ° ' " | Longitude ° ' " | Comments: TCLP-VOC/TCLP-BNA/TCLP-TR/TCLP-HG-H

Lab ID *: CS-1 | Location: CS-1 | ☐ Comp ☒ Grab | Collection (begin) Date 5/9/00 Time 1005 Eastern Central | Collection (end) Date Time Eastern Central | Bottle Group(s) **: A

Field ID: 25939 | Tot Res Chlorine (mg/L) | Diss Oxygen (mg/L) | Storet Station Number

Matrix (Include type e.g. Salt, Fresh, etc) | Temp (C) | pH | Sample Depth ☐ m ☐ ft | ☐ Salinity (PPTh) ☐ Sp Conductance (umho/cm) | NPDES Number

Latitude ° ' " | Longitude ° ' " | Comments: TCLP-VOC/TCLP-BNA/TCLP-TR/TCLP-HG-H

Lab ID *: | Location: | ☐ Comp ☐ Grab | Collection (begin) Date Time Eastern Central | Collection (end) Date Time Eastern Central | Bottle Group(s) **:

Field ID: | Tot Res Chlorine (mg/L) | Diss Oxygen (mg/L) | Storet Station Number

Matrix (Include type e.g. Salt, Fresh, etc) | Temp (C) | pH | Sample Depth ☐ m ☐ ft | ☐ Salinity (PPTh) ☐ Sp Conductance (umho/cm) | NPDES Number

Latitude ° ' " | Longitude ° ' " | Comments:

Lab ID *: | Location: | ☐ Comp ☐ Grab | Collection (begin) Date Time Eastern Central | Collection (end) Date Time Eastern Central | Bottle Group(s) **:

Field ID: | Tot Res Chlorine (mg/L) | Diss Oxygen (mg/L) | Storet Station Number

Matrix (Include type e.g. Salt, Fresh, etc) | Temp (C) | pH | Sample Depth ☐ m ☐ ft | ☐ Salinity (PPTh) ☐ Sp Conductance (umho/cm) | NPDES Number

Latitude ° ' " | Longitude ° ' " | Comments:

Relinquished By:	Date/Time	Received By:	Date/Time	Relinquished By:	Date/Time	Received By:	Date/Time
J. M. Dregne	5/9/00 1300						

* Shaded Areas for Lab use only.

** Please see reverse side for Bottle Group information.

last revised October 29,1999

Cooler Packing Worksheet For Request: RQ-2000-05-08-25
Howco Environmental Services
Ship Cooler On: 25-APR-2000 Requester: Maria A Cantera

Customer/Project: SW-DIST/OTHER-WSM Priority 3

813-744-6100 SC 512-1042
FL Dept. of Environmental Protection
3804 Coconut Palm Drive
Tampa, FL 33619

Attn: Maria de la Cantera

Comments:

Requested Analyses:

Group: A **# of Sites: 2**

Container ID: GJ-1L **Qty: 2** **Preservation: ICE** **, Lot #** 349569
Description: Glass Jar 1L

Analysis	Description
TCLP-BNA	TCLP for Semi-volatile organic pollutants by GC/MS.
TCLP-HG-H	Mercury in TCLP samples using cold vapor AA spectroscopy.
TCLP-TR	Metals, total recoverable, in TCLP samples using trace-ICP emission spectroscopy.

Container ID: GJ-SEP-250 **Qty: 4** **Preservation: ICE** **, Lot #** 300021
Description: 250 ml glass jar with a septa lid.

Analysis	Description
TCLP-VOC	Volatile organic pollutants in TCLP samples by GC/MS.

'Cooler Packed By:' MD & AS Date: 4/27/00
DEP Cooler ID #(s): 290

Kit must also include:
- ✓ Field Sheets
- ✓ Temperature Control Bottle (1 per cooler)
- ✓ FedEx Bills, if applicable (1 per cooler)
- ✓ Plastic Bags

If Preservation Included:
ID _____ Lot # _____
ID _____ Lot # _____
ID _____ Lot # _____
ID _____ Lot # _____

Cooler received intact? (Circle one) Yes No Received By/Date: _____

PLEASE RETURN ALL COOLERS FOR REQUEST RQ-2000-05-08-25

FedEx USA Airbill

FedEx Tracking Number: 8161 1887 6697

Form I.D. No.: 0215

SORT 2

Sender's Copy

1 From *Please print and press hard.*

Date 5/9/00

Sender's FedEx Account Number 1043-1506-2

Sender's Name Jim Dregne

Phone (813) 744-6100 x410

Company DEPT ENV. Protection

Address 3804 Coconut Palm Drive

Dept./Floor/Suite/Room

City TAMPA State FL ZIP 33619

2 Your Internal Billing Reference OPTIONAL

First 24 characters will appear on invoice.

3 To

Recipient's Name 372725020300217

Phone (850) 487-3922

Company DEPT OF ENVIR PROTECTION-MS

Address 2600 BLAIRSTONE RD

We cannot deliver to P.O. boxes or P.O. ZIP codes.

Dept./Floor/Suite/Room

To "HOLD" at FedEx location, print FedEx address here.

City TALLAHASSEE State FL ZIP 32399

NEW Peel and Stick FedEx USA Airbill

See back for application instructions.

Questions? Call 1·800·Go·FedEx® (800-463-3339)

Visit our Web site at www.fedex.com

By using this Airbill you agree to the service conditions on the back of this Airbill and in our current Service Guide, including terms that limit our liability.

0117675315

4a Express Package Service — *Packages up to 150 lbs.* Delivery commitment may be later in some areas.

- [X] FedEx Priority Overnight — Next business morning
- [ ] FedEx Standard Overnight — Next business afternoon
- [ ] FedEx First Overnight — Earliest next business morning delivery to select locations
- [ ] FedEx 2Day* — Second business day
- [ ] FedEx Express Saver* — Third business day

* FedEx Letter Rate not available. Minimum charge: One-pound rate

4b Express Freight Service — *Packages over 150 lbs.* Delivery commitment may be later in some areas.

- [ ] FedEx 1Day Freight* — Next business day
- [ ] FedEx 2Day Freight — Second business day
- [ ] FedEx 3Day Freight — Third business day

* Call for Confirmation: _____

5 Packaging — * Declared value limit $500

- [ ] FedEx Letter*
- [ ] FedEx Pak*
- [X] Other Pkg. — Includes FedEx Box, FedEx Tube, and customer pkg.

6 Special Handling

- [ ] **Saturday Delivery** — Available for FedEx Priority Overnight and FedEx 2Day to select ZIP codes
- [ ] **Sunday Delivery** — Available for FedEx Priority Overnight to select ZIP codes
- [ ] **HOLD Weekday at FedEx Location** — Not available with FedEx First Overnight
- [ ] **HOLD Saturday at FedEx Location** — Available for FedEx Priority Overnight and FedEx 2Day to select locations

Does this shipment contain dangerous goods? One box must be checked.

- [X] No
- [ ] Yes — As per attached Shipper's Declaration
- [ ] Yes — Shipper's Declaration not required
- [ ] Dry Ice — Dry Ice, 9, UN 1845 _____ x _____ kg

Dangerous Goods cannot be shipped in FedEx packaging.

- [ ] Cargo Aircraft Only

7 Payment *Bill to:* Enter FedEx Acct. No. or Credit Card No. below.

- [ ] Sender — Acct. No. in Section 1 will be billed.
- [X] Recipient
- [ ] Third Party
- [ ] Credit Card
- [ ] Cash/Check

FedEx Acct. No. / Credit Card No. _____ Exp. Date _____

Total Packages	Total Weight	Total Declared Value†	
		$ .00	FedEx Use Only

†Our liability is limited to $100 unless you declare a higher value. See back for details.

8 Release Signature *Sign to authorize delivery without obtaining signature.*

By signing you authorize us to deliver this shipment without obtaining a signature and agree to indemnify and hold us harmless from any resulting claims.

359

SRS 899 • Rev. Date 11/98 • Part #154813S • ©1994–98 FedEx • PRINTED IN U.S.A.

RETAIN THIS COPY FOR YOUR RECORDS

Terms And Conditions

Definitions On this Airbill, "we," "our," and "us" refer to Federal Express Corporation, its employees, and agents. "You" and "your" refer to the sender, its employees, and agents.

Agreement To Terms By giving us your package to deliver, you agree to all the terms on this Airbill and in our current Service Guide, which is available on request. You also agree to those terms on behalf of any third party with an interest in the package. If there is a conflict between the Service Guide and this Airbill, the Service Guide will control. No one is authorized to change the terms of our Agreement.

Responsibility For Packaging And Completing Airbill You are responsible for adequately packaging your goods and properly filling out this Airbill. If you omit the number of packages and/or weight per package, our billing will be based on our best estimate of the number of packages we received and/or an estimated "default" weight per package as determined by us.

Responsibility For Payment Even if you give us different payment instructions, you will always be primarily responsible for all delivery costs, as well as any cost we incur in either returning your package to you or warehousing it pending disposition.

Limitations On Our Liability And Liabilities Not Assumed

- Our liability in connection with this shipment is limited to the lesser of your actual damages or $100, unless you declare a higher value, pay an additional charge, and document your actual loss in a timely manner. You may pay an additional charge for each additional $100 of declared value. The declared value does not constitute, nor do we provide, cargo liability insurance.
- In any event, we will not be liable for any damage, whether direct, incidental, special, or consequential in excess of the declared value of a shipment, whether or not Federal Express had knowledge that such damages might be incurred including but not limited to loss of income or profits.
- We won't be liable:
  - for your acts or omissions, including but not limited to improper or insufficient packing, securing, marking, or addressing, or those of the recipient or anyone else with an interest in the package
  - if you or the recipient violates any of the terms of our Agreement
  - for loss or damage to shipments of prohibited items
  - for loss, damage, or delay caused by events we cannot control, including but not limited to acts of God, perils of the air, weather conditions, acts of public enemies, war, strikes, civil commotions, or acts of public authorities with actual or apparent authority.

Declared Value Limits

- The highest declared value allowed for FedEx Letter and FedEx Pak shipments is $500.
- For other shipments, the highest declared value allowed is $50,000 unless your package contains items of "extraordinary value," in which case the highest declared value allowed is $500.
- Items of "extraordinary value" include shipments containing such items as artwork, jewelry, furs, precious metals, negotiable instruments, and other items listed in our Service Guide.
- You may send more than one package on this Airbill and fill in the total declared value for all packages, not to exceed the $100, $500, or $50,000 per package limit described above. (Example: 5 packages can have a total declared value of up to $250,000.) In that case, our liability is limited to the actual value of the package(s) lost or damaged, but may not exceed the maximum allowable declared value(s) or the total declared value, whichever is less. You are responsible for proving the actual loss or damage.

Filing A Claim YOU MUST MAKE ALL CLAIMS IN WRITING and notify us of your claim within strict time limits set out in the current Service Guide.

You may call our Customer Service department at 1-800-Go-FedEx® (800-463-3339) to report a claim; however, you must still file a timely written claim.

Within 90 days after you notify us of your claim, you must send us all the information you have about it. We aren't obligated to act on any claim until you have paid all transportation charges, and you may not deduct the amount of your claim from those charges.

If the recipient accepts your package without noting any damage on the delivery record, we will assume the package was delivered in good condition. For us to process your claim, you must make the original shipping cartons and packing available for inspection.

Delivery to Residential Locations Shipments to residential locations using FedEx Express Saver may be delivered without obtaining the recipient's signature.

Right To Inspect We may, at our option, open and inspect your packages before or after you give them to us to deliver.

Right Of Rejection We reserve the right to reject a shipment when such shipment would be likely to cause delay or damage to other shipments, equipment, or personnel; or if the shipment is prohibited by law; or if the shipment would violate any terms of our Airbill or our current Service Guide.

C.O.D. Services C.O.D. SERVICE IS NOT AVAILABLE WITH THIS AIRBILL. If C.O.D. Service is required, please use a Federal Express C.O.D. Airbill.

Air Transportation Tax Included A federal excise tax when required by the Internal Revenue Code on the air transportation portion of this service, if any, is paid by us.

Money-Back Guarantee In the event of untimely delivery, Federal Express will, at your request and with some limitations, refund or credit all transportation charges. See current Service Guide for more information.

Part #154813S • Rev. 11/98

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AREA: SWD_______        Cash Receiving Application                CRAF006A
                  Collection Point Log Remittance      Tot: ______$1,762.50
+-------------------------------------------------------------------------+
| SYS$REMT: 379196__ Type: CP___    Recved Date: 03-APR-2000  Status: RECEIVED
| SYS$RCPT: 314255__ PNR: _______ Check #: 040352____  Amount: ______1,762.50
| SSN/FEI#: _________              Name: HOWCO_ENVIRONMENTAL_SERVICES__
|   First: _____________________ Middle: _____ Title:_______ Suf: _____
| Address1: 3701_CENTRAL_AVENUE_____________________ Short Comments:
| Address2: _____________________________________ S-OGC_97-2190_HW_________
|    City: ST._PETERSBURG_____ ST: FL  Zip: 33713-____ Country: __________
+-------------------------------------------------------------------------+
+-------------------------> P A Y M E N T (S) <---------------------------+
|          Distr                                                      S   |
|          CL     Object                    Payment                   Applic/   T   |
| SYS$PAYT Area.. Code/Description.....: Amount..... Reference#      Fund  A   |
| 398173__ SWD___ 012008 LCT-PENALTIES__ _____$1,762.50 OGC97-2190 ___ ECOSYS CO  |
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 COMMIT FREQUENTLY                    ______$1,762.50  Payment total
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Count: *1                                                    <Replace>
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MW

HOWCO Environmental Services
RESOURCE RECOVERY & EMERGENCY RESPONSE

March 16, 2000

Mr. Randall H. Strauss
Environmental Specialist II
Division of Waste Management
Department of Environmental Protection
Southwest District
3804 Coconut Palm Drive
Tampa, FL 33619

Dear Mr. Strauss:

Please find enclosed a copy of a letter dated September 30, 1996 addressed to Mr. Stowe from the Department of Environmental Protection concluding that tanks 28 - 36 are eligible for the Abandoned Tank Restoration Program.

HOWCO has constructed a secondary containment wall that has been coated with a coating that renders the area impervious to used oil. Also please find enclosed DEP Form #62-710-901(d) signed by V. W. Djordjevic, P.E.

Should you have any questions please do not hesitate to contact me.

Sincerely yours,

Jim Hagan

Mr. Arthur T. Hagan
President/CEO, HOWCO Environmental Services

3701 Central Avenue – St. Petersburg, FL 33713 - Tel. 727-327-8467 Fax: 727-321-6213
Operations: Tampa Bay - Ocala - Ft. Myers - 24-Hour Emergency Access 1-800-435-8467

DEP Form#	62-710.901(d)
Form Title	Used Oil Processing Facility Permit Application
Effective Date	December 23, 1996

APPLICATION FROM FOR A USED OIL PROCESSING PERMIT

PART II - CERTIFICATION

Form 62-710.901(d) P. E. Certification [Complete when required by Chapter 471, F.S. and Rules 62-4.050, 62-761, 62-762, and 62-710, F.A.C.]

Use this form to certify to the Department of Environmental Protection for:

1. Certification of secondary containment adequacy (capacity), structural integrity (structural strength), and underground process piping for storage tanks, process tanks, and container storage.
X. Certification of leak detection.
X. Substantial construction modifications.
X. Those elements of a closure plan requiring the expertise of an engineer.
X. Tank design for new or additional tanks.
X. Recertification of above items.

Please Print or Type

X Initial Certification _____ Recertification

1. DEP Facility ID Number: FLD 152-764-767 2. Tank Numbers: SEE TABLES 3.1, 3.2 & 3.3

3. Facility Name: HOWCO ENVIRONMENTAL SERVICES

4. Facility Address: 843 43rd STREET SOUTH, ST. PETERSBURG, FL 33711

This is to certify that the oil storage and processing facilities indicated on plant drawings as containment areas # 1 and #2 are in process of being upgraded to meet the requirements specified in 40 CFR 279.54 (d). Actually, the entire containment area #2 has been upgraded and currently meets the specified requirements. Containment area #1 is in process of being upgraded to meet the requirements specified. In that respect, at present time, on the south side of the containment area a temporary concrete block wall has been constructed and coated with an epoxy coating. This temporary construction is undertaken in order to prevent used oil release into system for migrating out of the system to the soil, groundwater or surface water while permanent construction of the south wall is performed after removal of four (4) tanks. This temporary constructed wall with the epoxy coating meets requirement specified in 40 CFR279.54 (d). One of the removed tanks will be re-installed on new foundations which will be poured integrally with containment concrete walls as part of final upgrading of the containment area #1. After construction of this south wall and mat, the containment area #1 will also meet the requirements specified.

As soon as the permanent construction on the south side of containment area #1 is completed, I will inspect and issue final certification.

V. W. Djordjevic
Signature

V.W. Djordjevic
Name (please type)

Florida Registration Number: 41412

Mailing Address: 6733 1st Avenue South
Street or P. O. Box

St. Petersburg, FL 33707
City State Zip

Date: 2/11/2000 Telephone (727 345-0800

[PLEASE AFFIX SEAL]

V. W. Djordjevic
2-11-2000

Department of Environmental Protection

Lawton Chiles
Governor

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

Virginia B. Wetherell
Secretary

September 30, 1996

Mr. Darren L. Stowe
A&E Road Oiling Service
843 43rd Street South
Saint Petersburg, Florida 37711-1945

RE: A&E Road Oiling Service - DEP Facility #_529502807
843 43rd Street South, Saint Petersburg, Florida

Dear Mr. Stowe:

The Florida Department of Environmental Protection (FDEP) received a series of Abandoned Tank Restoration Program (ATRP) applications for the following:

1. **Tanks #21-24, 28-36, 41-42**
2. **Tanks #40, 43-48**
3. **Tanks #37-38**

All these tanks are located at the above referenced facility; therefore, it has been concluded that these tanks are located within the partially eligible site determined eligible on December 1, 1995.

Should you have any additional questions regarding this outcome please contact either William E. Truman or myself at (904)488-3935 or the letterhead address.

Sincerely,

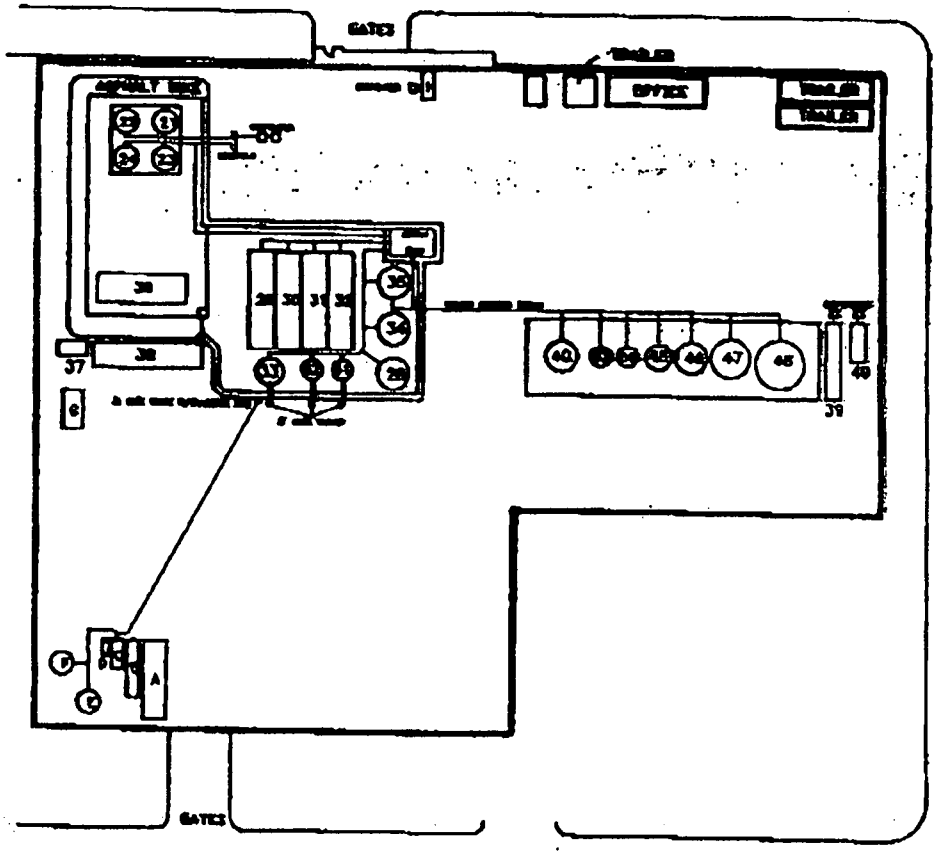
Rafael H. Perez
Environmental Specialist II

RHP/rhp

cc: Nancy Evans, FDEP Southwest District Office
Ernest M. Rogellin, HRS Pinellas County Public Health Unit

Scale: 1"=60'

8TH AVE SOUTH



43 RD STREET SOUTH

9TH AVE SOUTH

FLORIDA REMEDIATION SERVICES, INC.

308 SOUTH BOULEVARD TAMPA, FLORIDA 33606 (813)-254-8202
CONTAMINATED SOIL TREATMENT/GROUNDWATER REMEDIATION/TANK MANAGEMENT AND

CARLTON FIELDS

ATTORNEYS AT LAW

ONE HARBOUR PLACE
777 S. HARBOUR ISLAND BOULEVARD
TAMPA, FLORIDA 33602-5799

MAILING ADDRESS
P.O. BOX 3239, TAMPA, FL 33601-3239
TEL (813) 223-7000 FAX (813) 229-4133

FAX COVER SHEET

		Phone Number	Fax Number
Date:	February 15, 2000		
To:	Bill Kutash	(813) 744-6100 x353	(813) 744-6125
From:	Laurel Lockett	(813) 223-7000	(813) 229-4133

Client/Matter No.: 378/31028/59598

Total Number of Pages Being Transmitted, Including Cover Sheet: 4

Message:

Bill - Please see attached. It does not appear that Department Policy is to require annual retesting, nor does it specify what may constitute "general knowledge." Not A & S is not required to get annual retest, nor is a lab specified.

☐ ***Original to follow Via Regular Mail*** ☑ ***Original will Not be Sent*** ☐ ***Original will follow Via Federal Express***

IF THERE ARE ANY PROBLEMS OR COMPLICATIONS, PLEASE NOTIFY US IMMEDIATELY AT:
(813) 223-7000

TELECOPIER OPERATOR: _____

Department of
Environmental Protection

Lawton Chiles
Governor

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

Virginia B. Wetherell
Secretary

FLORIDA FACT SHEET ON THE MANAGEMENT OF WASTE ANTIFREEZE

4/20/95

Improper disposal of antifreeze can cause environmental problems. Antifreeze is made up of water and ethylene or propylene glycol. Neither of these unused ingredients would be regulated as a hazardous waste. However, heavy metal contaminants such as lead and organics such as benzene, tetrachloroethylene (PERC) or trichloroethylene have been found in waste antifreeze at levels that would identify the waste antifreeze as hazardous. Under the federal and state hazardous waste regulations, any waste containing regulated levels of heavy metals or organics would be hazardous waste.

Each business that generates solid waste must make a hazardous waste determination as required by Title 40, Code of Federal Regulations (CFR), Section 262.11. A waste determination can be made by testing the waste using the Toxicity Characteristic Leaching Procedure (TCLP), Test Method 1311, or by applying knowledge of the waste in light of the materials or the processes used.

Since the quality and nature of waste antifreeze can be dependent upon conditions not in the control of the generator of the waste antifreeze (e.g., type of radiator, maintenance, additives, etc.), it may not be possible to use product or process knowledge without first testing to make a hazardous waste determination. A generator can establish product knowledge by initially testing to determine whether the waste antifreeze is, or is not, hazardous waste. If the testing indicates the waste antifreeze does not exhibit a characteristic of hazardous waste, product knowledge (based on initial testing) may be used until the process changes.

DOES NOT REQUIRE ANNUAL TESTING

If the generator determines that the waste is, or is not, hazardous waste based on product knowledge of the waste, then all supporting data used to make this determination must be retained on site in the generator's files. If a generator determines that the waste is, or is not, hazardous waste based on testing this waste or an extract developed using the TCLP, Test Method 1311, all waste analysis data must be retained on-site in the generator's files. The testing and analysis must be repeated if the process generating the waste has changed. TCLP testing can be limited to the contaminants that are most likely to be found in the waste antifreeze. These include lead, benzene, tetrachloroethylene (PERC) and trichloroethylene.

DOES NOT SPECIFY FORM OF ANALYSIS FOR "KNOWLEDGE"

Copies of all notices, certifications, waste analysis data, and other documentation must be retained for five years from the date that the waste was last sent to recycling facility or an on site or off site treatment, storage, or disposal facility.

Facilities generating 220 pounds per month or greater of all hazardous waste (including many recyclable wastes such as antifreeze) are subject to the requirements of 40 CFR, Parts 262 through 268, 270 and the notification requirements of Section 3010 of RCRA. These facilities (SQGs and LQGs) cannot offer waste antifreeze that is hazardous waste to an unregistered hazardous waste transporter. Also, the generator and recycler must comply with the Clean Water Act pretreatment standards and related locally based discharge limits for discharges to the sewer.

Under the hazardous waste regulations, facilities generating less than 220 pounds of hazardous waste per month and accumulating no more than 2,200 pounds of hazardous waste at any time are not subject to the requirements of 40 CFR, Parts 262 through 268, 270 and the notification requirements of Section 3010 of RCRA provided they comply with 40 CFR, Section 261.5, "Special requirements for hazardous waste generated by conditionally exempt small quantity generators (CESQGs)". These CESQG facilities must assure delivery of hazardous waste to a proper recycling or treatment, storage, or disposal facility. They do not have to use a registered hazardous waste transporter. CESQGs which choose to send their hazardous waste to a recycling facility or an off-site treatment, storage or disposal facility shall document delivery of the hazardous waste through written receipts or other records which are retained for at least three years. The written receipts or other records shall include names and addresses of the generator and the recycling, treatment, storage or disposal facility, the type and amount of hazardous waste delivered, and the date of shipment.

The Department encourages the proper recycling of waste antifreeze. There are waste antifreeze service companies that will service and recycle your antifreeze.

For additional information or to receive a copy of "Summary of Hazardous Waste Regulations" or "Florida's Handbook for Small Quantity Generators of Hazardous Waste" contact:

Hazardous Waste Management or Regulation Sections
Florida Department of Environmental Protection
2600 Blair Stone Road
Tallahassee, Florida 32399-2400
(904) 488-0300

A&S Oil Recovery of Florida, Inc.
4601 - 8th Avenue South, St. Petersburg, FL 33711
U.S. EPA No. FLD 991 275 314
Operation Permit Application No. HO52-308154

Attachment IV

Analysis Plan

A&S Oil drivers ask the generators for their EPA identification number. However, typically the generators dispose of less than 100 kilograms per month. Given that the small quantity generators have a number, the driver puts the number on the receipt. During the pre-qualification process for a new generator the driver will carefully open the generator's containers. After opening the container the driver will stand away from the container and pull the vapors towards him and smell with his nose for possible solvent odors. The driver tests the contents of each container separately with the HLD440 HALOGEN DETECTOR (sniffer). The driver collects a sample(s) and brings the sample(s) to the plant lab. The used oil sample is temporarily stored in a 40 milliliter vial. At the plant lab the foreman or Mr. Amaral checks the sample(s) with the sniffer and compares the sample with the 400, 650, 800 and 990 ppm standards (the standards are labeled containers which have been analytically derived). The sniffer is designed to sense the dominant group of chlorinated halogens. If the sample exceeds 990 ppm the generator is asked to have the oil sampled by a certified lab before it can be accepted. Attached is the operation and maintenance manual for the sniffer.

During a typical pick up (have dealt with generator previously) each pick up of oil is analyzed by a sniffer. If the sniffer gives a reading above 990 ppm, the generator is informed that the oil should be tested and will not be picked up. A manifest for each pick up is signed by the generator who through a laboratory analysis or "generators knowledge" attests that the material is non-hazardous. A chain of custody form for each sample delivered to the laboratory accompanies the oil sample. At the end of the day after the driver has completed all his dispatches the truck load is tested again at the plant by the plant foreman or Mr. Amaral for chlorine (dominant parameter accepted as an indicator of total organic halides), and flash point.

Typically, there is no annual recertification for the generators given that each load is checked twice with the sniffer, once before pick up and once before the material is transferred from the trucks to the plant.

Typically, A&S drivers do not intentionally pick up antifreeze. However, occasionally, at the request of the generator, A&S drivers pick up antifreeze. Before the antifreeze is picked up, the generator must demonstrate to the driver that the antifreeze is not a hazardous waste. The generator must provide results of a TCLP analysis for lead, benzene, PERC and TCE for which levels cannot exceed 5.0, 0.5, 0.7, and 0.5 milligrams per liter (mg/l) or parts per million (ppm), respectively. After initial testing, if the generator's process is unchanged future loads of antifreeze can be accepted. However, the testing and analysis must be repeated if the generator's process has changed. The procedures addressed in the attached Florida Fact Sheet on the Management of Waste Antifreeze will be followed.

Each outgoing batch is analyzed by a laboratory with an FDEP approved quality assurance plan. The laboratory will analyze the composite sample for flash point, chlorine, PCB and metals (arsenic, cadmium, chromium, and lead) before delivery to a buyer. Samples from Tanks 4 and 5 will be taken equal to the volume ratio of Tanks 4 and 5 in the outbound load. For example in a outbound load if 500 gallons is taken from Tank 4 and 25,000 gallons is taken from Tank 5 the ratio of the composite sample ratio is one tenth of a vial (4 milliliters, ml) from Tank 4 to 5 vials (200 ml) from Tank 5 (the volume of one vial is approximately 40 ml). If 500 gallons is taken from Tank 4 and 20,000 gallons is taken from Tank 5, the composite sample ratio is one tenth of a vial (4 ml) from Tank 4 to 4 vials (160 ml) from Tank 5. If 1,000 gallons is taken from Tank 4 and 20,000 gallons is taken from Tank 5, the

HOWCO Environmental Services
RESOURCE RECOVERY & EMERGENCY RESPONSE

March 16, 2000

Mr. Randall H. Strauss
Environmental Specialist II
Division of Waste Management
Department of Environmental Protection
Southwest District
3804 Coconut Palm Drive
Tampa, FL 33619

Dear Mr. Strauss:

Please find enclosed a copy of a letter dated September 30, 1996 addressed to Mr. Stowe from the Department of Environmental Protection concluding that tanks 28 - 36 are eligible for the Abandoned Tank Restoration Program.

HOWCO has constructed a secondary containment wall that has been coated with a coating that renders the area impervious to used oil. Also please find enclosed DEP Form #62-710-901(d) signed by V. W. Djordjevic, P.E.

Should you have any questions please do not hesitate to contact me.

Sincerely yours,

Jim Hagan

Mr. Arthur T. Hagan
President/CEO, HOWCO Environmental Services

3701 Central Avenue – St. Petersburg, FL 33713 - Tel. 727-327-8467 Fax: 727-321-6213
Operations: Tampa Bay - Ocala - Ft. Myers - 24-Hour Emergency Access 1-800-435-8467

DEP Form#	62-710.901(d)
Form Title	Used Oil Processing Facility Permit Application
Effective Date	December 23, 1996

APPLICATION FROM FOR A USED OIL PROCESSING PERMIT

PART II - CERTIFICATION

Form 62-710.901(d) P. E. Certification [Complete when required by Chapter 471, F.S. and Rules 62-4.050, 62-761,62-762, and 62-710, F.A.C.]

Use this form to certify to the Department of Environmental Protection for:

1. Certification of secondary containment adequacy (capacity), structural integrity (structural strength), and underground process piping for storage tanks, process tanks, and container storage.
X. Certification of leak detection.
X. Substantial construction modifications.
X. Those elements of a closure plan requiring the expertise of an engineer.
X. Tank design for new or additional tanks.
X. Recertification of above items.

Please Print or Type

X Initial Certification _____ Recertification

1. DEP Facility ID Number: FLD 152-764-767 2. Tank Numbers: SEE TABLES 3.1, 3.2 & 3.3

3. Facility Name: HOOD ENVIRONMENTAL SERVICES

4. Facility Address: 843 43rd STREET SOUTH, ST. PETERSBURG, FL 33711

This is to certify that the oil storage and processing facilities indicated on plant drawings as containment areas # 1 and #2 are in process of being upgraded to meet the requirements specified in 40 CFR 279.54 (d). Actually, the entire containment area #2 has been upgraded and currently meets the specified requirements. Containment area #1 is in process of being upgraded to meet the requirements specified. In that respect, at present time, on the south side of the containment area a temporary concrete block wall has been constructed and coated with an epoxy coating. This temporary construction is undertaken in order to prevent used oil release into system for migrating out of the system to the soil, groundwater or surface water while permanent construction of the south wall is performed after removal of four (4) tanks. This temporary constructed wall with the epoxy coating meets requirement specified in 40 CFR279.54 (d). One of the removed tanks will be re-installed on new foundations which will be poured integrally with containment concrete walls as part of final upgrading of the containment area #1. After construction of this south wall and mat, the containment area #1 will also meet the requirements specified.

As soon as the permanent construction on the south side of containment area #1 is completed, I will inspect and issue final certification.

V. W. Djordjevic
Signature

V.W. Djordjevic
Name (please type)

Florida Registration Number: 41412

Mailing Address: 6733 1st Avenue South
Street or P. O. Box

St. Petersburg, FL 33707
City State Zip

Date: 2/11/2000 Telephone (727 345-0800

[PLEASE AFFIX SEAL]

V. W. Djordjevic
2-11-2000

Department of Environmental Protection

Lawton Chiles
Governor

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

Virginia B. Wetherell
Secretary

September 30, 1996

Mr. Darren L. Stowe
A&E Road Oiling Service
843 43rd Street South
Saint Petersburg, Florida 37711-1945

RE: A&E Road Oiling Service - DEP Facility #_529502807
843 43rd Street South, Saint Petersburg, Florida

Dear Mr. Stowe:

The Florida Department of Environmental Protection (FDEP) received a series of Abandoned Tank Restoration Program (ATRP) applications for the following:

1. **Tanks #21-24, 28-36, 41-42**
2. **Tanks #40, 43-48**
3. **Tanks #37-38**

All these tanks are located at the above referenced facility; therefore, it has been concluded that these tanks are located within the partially eligible site determined eligible on December 1, 1995.

Should you have any additional questions regarding this outcome please contact either William E. Truman or myself at (904)488-3935 or the letterhead address.

Sincerely,

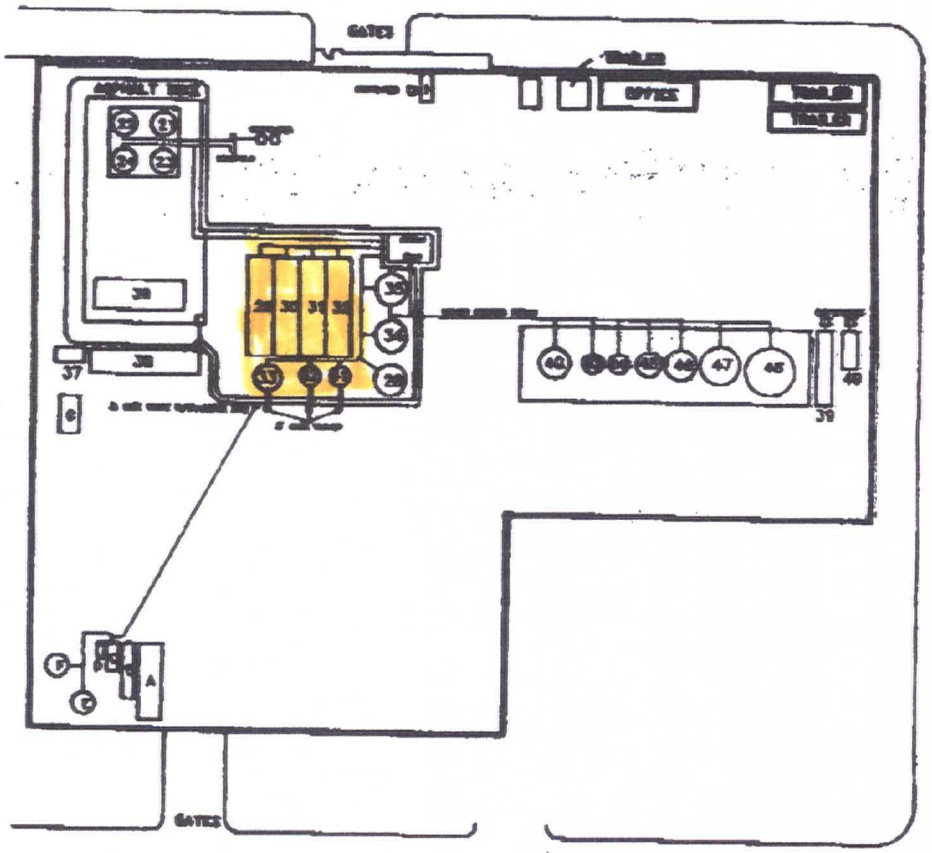
Rafael H. Perez
Environmental Specialist II

RHP/rhp

cc: Nancy Evans, FDEP Southwest District Office
Ernest M. Rogellin, HRS Pinellas County Public Health Unit

Scale 1"=60'

8TH AVE SOUTH



43 RD STREET SOUTH

9TH AVE SOUTH

FRS FLORIDA REMEDIATION SERVICES, INC.

308 SOUTH BOULEVARD TAMPA, FLORIDA 33606 (813)-254-8202
CONTAMINATED SOIL TREATMENT/GROUNDWATER REMEDIATION/TANK MANAGEMENT AND

AREA: SWD_____ Cash Receiving Application CRAF006A
Collection Point Log Remittance Tot: _____$1,762.50

SYS$REMT: 375571__ Type: CP___ Recved Date: 28-FEB-2000 Status: RECEIVED
SYS$RCPT: 310931__ PNR: _____ Check #: 040113____ Amount: _____1,762.50
SSN/FEI#: _____ Name: HOWCO_ENVIRONMENTAL_SVCS._____
First: _____ Middle: _____ Title:_____ Suf: _____
Address1: 3701_CENTRAL_AVENUE_____ Short Comments:
Address2: _____ S-HW_OGC_97-2190_____
City: ST._PETERSBURG_____ ST: FL Zip: 33713-____ Country: _____

P A Y M E N T (S)

SYS$PAYT	Distr CL Area..	Object Code/Description.....:	Payment Amount.....	Reference#	Applic/ Fund	S T A CO
394209__	SWD___	012008 LCT-PENALTIES__	_____$1,762.50	OGC97-2190	___ ECOSYS	
_____	_____	_____ _____	_____	_____	___ _____	__
_____	_____	_____ _____	_____	_____	___ _____	__
_____	_____	_____ _____	_____	_____	___ _____	__
_____	_____	_____ _____	_____	_____	___ _____	__

COMMIT FREQUENTLY _____$1,762.50 Payment total
Press_<TAB>_to_accept_Collection_Point_or_enter_F&A._____
Count: *1 <Replace>

Chemical Analysis Report

SW-DIST-2000-01-21-01

Florida Department of Environmental Protection
Central Laboratory
2600 Blair Stone Road
Tallahassee, FL 32399-2400
CompQAP# 870688G

Event Description: **Howco Environmental Services**

Request ID: **RQ-2000-01-17-16**

Customer: **SW-DIST**

Project ID: **OTHER-WSM**

Job: TLH-2000-01-21-36	Group: Pesticides
Job: TLH-2000-01-21-36	Group: Priority Organic Pollutants
Job: TLH-2000-01-21-38	Group: Metals
Job: TLH-2000-01-21-39	Group: Metals
Job: TLH-2000-01-21-40	Group: Priority Organic Pollutants

Send Reports to
FL Dept. of Environmental Protection
FL Dept. of Environmental Protection
3804 Coconut Palm Drive
Tampa, FL 33619
Attn: Maria de la Cantera

For additional information please contact
Timothy W. Fitzpatrick
Yuh-Hsu Pan, Ph.D.
Liang-Tsair Lin, Ph.D.
Christopher A. Morgan, Ph.D.
Suncom 277-2571 Phone (850) 487-2571

Revision certified by: Han Date: 2/15/00

Report Printed Date: Feb 15, 2000

Abbreviations and data remark codes

A - Value reported is the mean of two or more determinations
B - Results based on colony counts outside the acceptable range.
I - The reported value is between the laboratory method detection limit and the laboratory practical quantitation limit.
J - Estimated value
K - Actual value is known to be less than value given
L - Actual value is known to be greater than value given
N - Presumptive evidence of presence of material.
O - Sampled, but analysis lost or not performed.
Q - Sample held beyond normal holding time.
T - Value reported is less than the criterion of detection.
U - Material was analyzed for but not detected; The value reported is the minimum detection limit.
V - Analyte was detected in both sample and method blank.
Y - The laboratory analysis was from an unpreserved or improperly preserved sample. The data may not be accurate
Z - Colonies were too numerous to count (TNTC).

Benzene	180	A	ug/L
Bromoform	2.5	U	ug/L
Carbon tetrachloride	1.0	U	ug/L
Chlorobenzene	1.0	U	ug/L
Chloroform	140	A	ug/L
Dibromochloromethane	1.0	U	ug/L
1,2-Dichlorobenzene	1.0	U	ug/L
1,3-Dichlorobenzene	1.0	U	ug/L
1,4-Dichlorobenzene	1.0	U	ug/L
1,1-Dichloroethane	1.0	U	ug/L
1,2-Dichloroethane	1.0	U	ug/L
1,1-Dichloroethene	1.0	U	ug/L
1,2-Dichloropropane	1.0	U	ug/L
Ethylbenzene	130	A	ug/L
Methylene chloride	13	A	ug/L
1,1,2,2-Tetrachloroethane	1.0	U	ug/L
Tetrachloroethene	41	A	ug/L
Toluene	500	A	ug/L
1,1,1-Trichloroethane	1.0	U	ug/L
1,1,2-Trichloroethane	1.0	U	ug/L
Trichloroethene	27	A	ug/L
Vinyl chloride	2.5	U	ug/L
Xylenes (total)	730	A	ug/L
Acetone	50	U	ug/L
Carbon disulfide	2.5	U	ug/L
2-Butanone	50	U	ug/L
Trichlorofluoromethane	1.0	U	ug/L
4-Methyl-2-Pentanone	50	U	ug/L

Sample Location: OES-119 TANK 110

Field ID: 25646

Collection Date/Time: 1/19/2000 9:55 AM

Matrix: WAS-SOLID

Lab ID: 428945 **Storet Code** **Component** **Result** **Code** **Units**

Test: TCLP for Semi-volatile organic pollutants by GC/MS. (EPA 625/ 8270 mod.)

Comments:
Please refer to QC Report for parameters exceeding limits. Insufficient sample to prepare a duplicate matrix spike. MDL and PQL elevated due to required sample dilution.

39340	gamma-BHC	12	U	ug/L
77151	m,p-Cresols	520		ug/L
77152	o-Cresol	79		ug/L
34571	1,4-Dichlorobenzene	8.3	U	ug/L
34611	2,4-Dinitrotoluene	8.3	U	ug/L
39390	Endrin	12	U	ug/L
39700	Hexachlorobenzene	8.3	U	ug/L
34391	Hexachlorobutadiene	25	U	ug/L
34396	Hexachloroethane	25	U	ug/L

Xylenes (total)	1400		ug/L
Acetone	1000	U	ug/L
Carbon disulfide	50	U	ug/L
2-Butanone	1000	U	ug/L
Trichlorofluoromethane	20	U	ug/L
4-Methyl-2-Pentanone	1000	U	ug/L

Ethylbenzene	106	96.9	101	103	2.74	8.67
Methylene chloride	104	98.6	92.8	95.8	3.14	5.68
Tetrachloroethene	89.3	96.1	103	107	3.08	7.32
Toluene	92.5	99.2	100	102	2.13	7.03
Trichloroethene	90.0	98.9	107	107	0.0561	9.49
Trichlorofluoromethane	108	98.7	123	123	0.505	9.36
Xylenes (total)	103	98.2	96.7	99.2	2.54	5.14

Log-in Checklist

RQ ID: RQ-2000-01-17-16

Cooler Check

Cooler ID	Ice Present? Yes	Ice Present? No	If No, Temperature	Evidence Tape Present? Yes	Evidence Tape Present? No	Evidence Tape Intact? Yes	Evidence Tape Intact? No	Tracking Number
324	✓				✓			808009374526

Note: If the the temperature of a cooler is above 6° C or an evidence seal is damaged then identify the bottles, in the affected cooler(s), on back of form.

Shipping Method: Fed Ex **Date/Time of Receipt:** 01-21-00 10:15

Acid Preserved Samples pH Checked: pH </=2 ? Yes____ No____ NA ✓ HW

If No, fill out back of form.

Base Preserved Samples pH Checked: All OK? Yes____ No____ NA ✓ HW

(W-CN, OV-CN - pH >/= 12), (W-SULFDE-F, W-SULFIDE - pH >/= 9)

If No, fill out back of form.

Evidence Tape on Bottles Present: Yes____ No ✓

If Yes, is it intact? Yes____ No____

If not intact then fill out back of form.

Condition of Containers:

Loose Caps: Yes____ No ✓

If Yes, fill out back of form.

Broken Containers: Yes____ No ✓

If Yes, fill out back of form.

Chain Of Custody Form Included? Yes ✓ No____ **Field Sheet(s) Included?** Yes ✓ No____

If Yes verify receipt of all containers listed then sign custody form. Document discrepancies (i.e. missing containers) on COC form.

Event ID: SW-DIST-2000-01-21-01

Coolers Unpacked/Checked by: HW **Date:** 01-21-00

Event Logged in by: HW

NA - Not Applicable (i.e. sediment samples)

STATE OF FLORIDA
DEPARTMENT OF ENVIRONMENTAL PROTECTION

CHAIN OF CUSTODY RECORD

Page 1 of 1

PROJECT NAME	SUBMITTING AGENCY NAME	SUBMITTING AGENCY CODE
Howco Environmental Services		

SAMPLER SIGNATURE(S): Randall W. Strauss

RQ # RQ-2000-01-17-16

MODULE # 3060

STATION/ LOCATION/ NUMBER	DATE M/D/Y	TIME ####	COMP/ GRAB	# Containers	TCLP-VOC	TCLP-BNA	TCLP-TR	TCLP-HG-H					Field ID #
					← ~~Tampa Samples~~				Tallahassee Samples →				
WWT-119	1/19/2000	0955	Comp	3	X	X	X	X					25645
OES-119 Tank 110	1/19/2000	1045	Comp	3	X	X	X	X					25646
Trip Blank													25647

Tampa Samples				
Sealed and Relinquished by:	Date/ Time	Method of Dispatch:	Opened and Accepted by:	Date/ Time
Sealed and Relinquished by:	Date/ Time	Method of Dispatch:	Opened and Accepted by:	Date/ Time
Tallahassee Samples				
Sealed and Relinquished by: Randall W. Strauss	Date/ Time 1/19/2000 0445	Method of Dispatch: Hand-to-Hand.	~~Opened~~ Accepted by:	Date/ Time 1/19/2000 0945
Sealed and Relinquished by:	Date/ Time 1/20/2000 0400	Method of Dispatch: FED EX	Opened and Accepted by:	Date / Time 1/21/00 10:15

Cooler Packing Worksheet For Request: RQ-2000-01-17-16
Howco Environmental Services
Ship Cooler On: 11-JAN-2000 Requester: Maria A Cantera

Customer/Project: SW-DIST/OTHER-WSM Priority 3

813-744-6100 SC 512-1042
FL Dept. of Environmental Protection
3804 Coconut Palm Drive
Tampa, FL 33619

Attn: Maria de la Cantera

Comments:
Splitting sample with Howco consultant.

Requested Analyses:

Group: A **# of Sites: 2**

Container ID: GJ-500ML **Qty: 2** **Preservation: ICE** **, Lot #** 186826
Description: Glass Jar 500 mL

Analysis	Description
TCLP-BNA	TCLP for Semi-volatile organic pollutants by GC/MS.

Container ID: GJ-500ML **Qty: 2** **Preservation: ICE** **, Lot #** 186826
Description: Glass Jar 500 mL

Analysis	Description
TCLP-HG-H	Mercury in TCLP samples using cold vapor AA spectroscopy.
TCLP-TR	Metals, total recoverable, in TCLP samples using trace-ICP emission spectroscopy.

Container ID: GJ-SEP-250 **Qty: 4** **Preservation: ICE** **, Lot #** 30002 1
Description: 250 ml glass jar with a septa lid.

Analysis	Description
TCLP-VOC	Volatile organic pollutants in TCLP samples by GC/MS.

'Cooler Packed By: _____ Date: 1/18/00

DEP Cooler ID #(s): 56

Kit must also include:
__ Field Sheets
__ Temperature Control Bottle (1 per cooler)
__ FedEx Bills, if applicable (1 per cooler)
__ Plastic Bags

If Preservation Included:
ID _____ Lot # _____
ID _____ Lot # _____
ID _____ Lot # _____
ID _____ Lot # _____

Cooler received intact? (Circle one) Yes No Received By/Date: _____

PLEASE RETURN ALL COOLERS!

HOWCO Environmental Services
RESOURCE RECOVERY & EMERGENCY RESPONSE

February 11, 2000

Ms. Beth Knauss
Division of Waste Management
Department of Environmental Protection
Southwest District
3804 Coconut Palm Drive
Tampa, FL 33619

Re: HOWCO Environmental Services EPA ID # FLD 152 764 767
843 43rd Street South
St. Petersburg, FL 33711
OGC Case No., 97-2190

Dear Ms. Knauss:

In response to Mr. Randy Strauss's letter dated January 28, 2000, Please find enclosed a copy of our Professional Engineer's certification that containment area #1 has been sealed so as to be impervious to used oil.

Also, I have been advised by HOWCO's Accounting Department that check #033198 was cut and mailed on December 23, 1999. If the Department still has not received this check, please let me know and we will issue a stop payment and re-issue the check to the Department.

Should you have any questions, please do not hesitate to contact me at 727-324-8467.

Sincerely yours,

Tim Hagan
President/CEO

Attachment

TH/jh

3701 Central Avenue – St. Petersburg, FL 33713 - Tel. 727-327-8467 Fax: 727-321-6213
Operations: Tampa Bay - Ocala - Ft. Myers - 24-Hour Emergency Access 1-800-435-8467

DEP Form#	62-710.901(d)
Form Title	Used Oil Processing Facility Permit Application
Effective Date	December 23, 1996

APPLICATION FROM FOR A USED OIL PROCESSING PERMIT

PART II - CERTIFICATION

Form 62-710.901(d) P. E. Certification [Complete when required by Chapter 471, F.S. and Rules 62-4.050, 62-761,62-762, and 62-710, F.A.C.]

Use this form to certify to the Department of Environmental Protection for:

1. Certification of secondary containment adequacy (capacity), structural integrity (structural strength), and underground process piping for storage tanks, process tanks, and container storage.
X. Certification of leak detection.
X. Substantial construction modifications.
X. Those elements of a closure plan requiring the expertise of an engineer.
X. Tank design for new or additional tanks.
X. Recertification of above items.

Please Print or Type

X Initial Certification _____ Recertification

1. DEP Facility ID Number: FLD 152-764-767 2. Tank Numbers: SEE TABLES 3.1, 3.2 & 3.3

3. Facility Name: HOWCO ENVIRONMENTAL SERVICES

4. Facility Address: 843 43rd STREET SOUTH, ST. PETERSBURG, FL 33711

This is to certify that the oil storage and processing facilities indicated on plant drawings as containment areas # 1 and #2 are in process of being upgraded to meet the requirements specified in 40 CFR 279.54 (d). Actually, the entire containment area #2 has been upgraded and currently meets the specified requirements. Containment area #1 is in process of being upgraded to meet the requirements specified. In that respect, at present time, on the south side of the containment area a temporary concrete block wall has been constructed and coated with an epoxy coating. This temporary construction is undertaken in order to prevent used oil release into system for migrating out of the system to the soil, groundwater or surface water while permanent construction of the south wall is performed after removal of four (4) tanks. This temporary constructed wall with the epoxy coating meets requirement specified in 40 CFR279.54 (d). One of the removed tanks will be re-installed on new foundations which will be poured integrally with containment concrete walls as part of final upgrading of the containment area #1. After construction of this south wall and mat, the containment area #1 will also meet the requirements specified.

As soon as the permanent construction on the south side of containment area #1 is completed, I will inspect and issue final certification.

V. W. Djordjevic
Signature

V.W. Djordjevic
Name (please type)

Florida Registration Number: 41412

Mailing Address: 6733 1st Avenue South
Street or P. O. Box

St. Petersburg, FL 33707
City State Zip

Date: 2/11/2000 Telephone (727 345-0800

[PLEASE AFFIX SEAL]

V. W. Djordjevic
2-10-2000

```
AREA: SWD_______        Cash Receiving Application                    CRAF006A
                  Collection Point Log Remittance      Tot: ______$1,762.50
+-------------------------------------------------------------------------+
| SYS$REMT: 372796__ Type: CP___    Recved Date: 01-FEB-2000  Status: RECEIVED |
| SYS$RCPT: 308381__ PNR: _______ Check #: 040006____ Amount: ______1,762.50 |
| SSN/FEI#: _________              Name: HOWCO_ENVIRONMENTAL_SERVICES__    |
|    First: _____________ Middle: _____ Title:_______ Suf: _____          |
| Address1: 3701_CENTRAL_AVENUE_____________________ Short Comments:      |
| Address2: _____________________________________ S-OGC97-2190_____________ |
|    City: ST._PETERSBURG_____ ST: FL  Zip: 33713-____ Country: _________ |
+-------------------------------------------------------------------------+
+-------------------------> P A Y M E N T (S) <---------------------------+
|          Distr                                                      S   |
|          CL     Object                    Payment                   Applic/    T   |
| SYS$PAYT Area.. Code/Description.....: Amount..... Reference#      Fund  A   |
| 391238__ SWD___ 012008 LCT-PENALTIES__ _____$1,762.50 OGC97-2190 ___ ECOSYS CO  |
| _______ ______ ______ _____________ _____________ _____ ___ _____ __  |
| _______ ______ ______ _____________ _____________ _____ ___ _____ __  |
| _______ ______ ______ _____________ _____________ _____ ___ _____ __  |
| _______ ______ ______ _____________ _____________ _____ ___ _____ __  |
+-------------------------------------------------------------------------+
 COMMIT FREQUENTLY                    ______$1,762.50  Payment total
Press_<TAB>_to_accept_Collection_Point_or_enter_F&A._____________________
Count: *1                                                    <Replace>
```

33613/1352

```
AREA: SWD_______        Cash Receiving Application                    CRAF006A
                  Collection Point Log Remittance      Tot: ______$1,762.50
+-------------------------------------------------------------------------+
| SYS$REMT: 381792__ Type: CP___    Recved Date: 01-MAY-2000  Status: RECEIVED
| SYS$RCPT: 316560__ PNR: _______ Check #: 040527____  Amount: ______1,762.50
| SSN/FEI#: _________              Name: HOWCO_ENVIRONMENTAL_SERVICES__
|    First: _____________ Middle: _____ Title:_______ Suf: _____
| Address1: 3701_CENTRAL_AVENUE_____________________ Short Comments:
| Address2: _____________________________________ CB-OGC_97-2190__________
|    City: ST_PETERSBURG_____ ST: FL  Zip: 33713-____ Country: _________
+-------------------------------------------------------------------------+
+-------------------------> P A Y M E N T (S) <---------------------------+
|          Distr                                                      S   |
|          CL     Object                    Payment                   T   |
| SYS$PAYT Area.. Code/Description.....: Amount........ Reference#  Fund A |
| 401219__ SWD___ 012008 LCT-PENALTIES__ _____$1,762.50 OGC97-2190 ___ ECOSYS CO
| _______ _______ ______ _____________ _____________ _____________ ___ _____ __
| _______ _______ ______ _____________ _____________ _____________ ___ _____ __
| _______ _______ ______ _____________ _____________ _____________ ___ _____ __
| _______ _______ ______ _____________ _____________ _____________ ___ _____ __
+-------------------------------------------------------------------------+
 COMMIT FREQUENTLY                    ______$1,762.50  Payment total
Press_<TAB>_to_accept_Collection_Point_or_enter_F&A._____________________
Count: *1                                                    <Replace>
```

Department of Environmental Protection

Jeb Bush
Governor

Southwest District
3804 Coconut Palm Drive
Tampa, Florida 33619

David B. Struhs
Secretary

January 28, 2000

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

Re: Howco Environmental Services EPA ID# FLD 152 764 767
843 43rd Street South
St. Petersburg, FL
OGC Case No.: 97-2190

Dear Mr. Hagan:

The Department has not received a Professional Engineer's certification from Howco that Containment Area #1 (as identified in the Consent Order in the above referenced case) has been sealed so as to be impervious to used oil. The work was required to have been completed by January 1, 2000, and the certification submitted within 30 days. Please provide a response within 10 days of your receipt of this letter stating whether this work has been completed, and if so, enclose the certification. If the work has not been completed, please provide an explanation and an estimated completion date.

In addition to the above matter, it appears that Howco missed the penalty payment that was due December 30, 1999. Today, I left a message with Sharon in accounting to check on this matter and send the payment immediately, if she verifies that it was not submitted. Please ensure that Howco meets the Consent Order conditions or additional stipulated penalties may be assessed. Please be aware that per Paragraph 12 of the Order, Howco has agreed to pay the Department $100.00 per day for each and every violation of a condition of the Order.

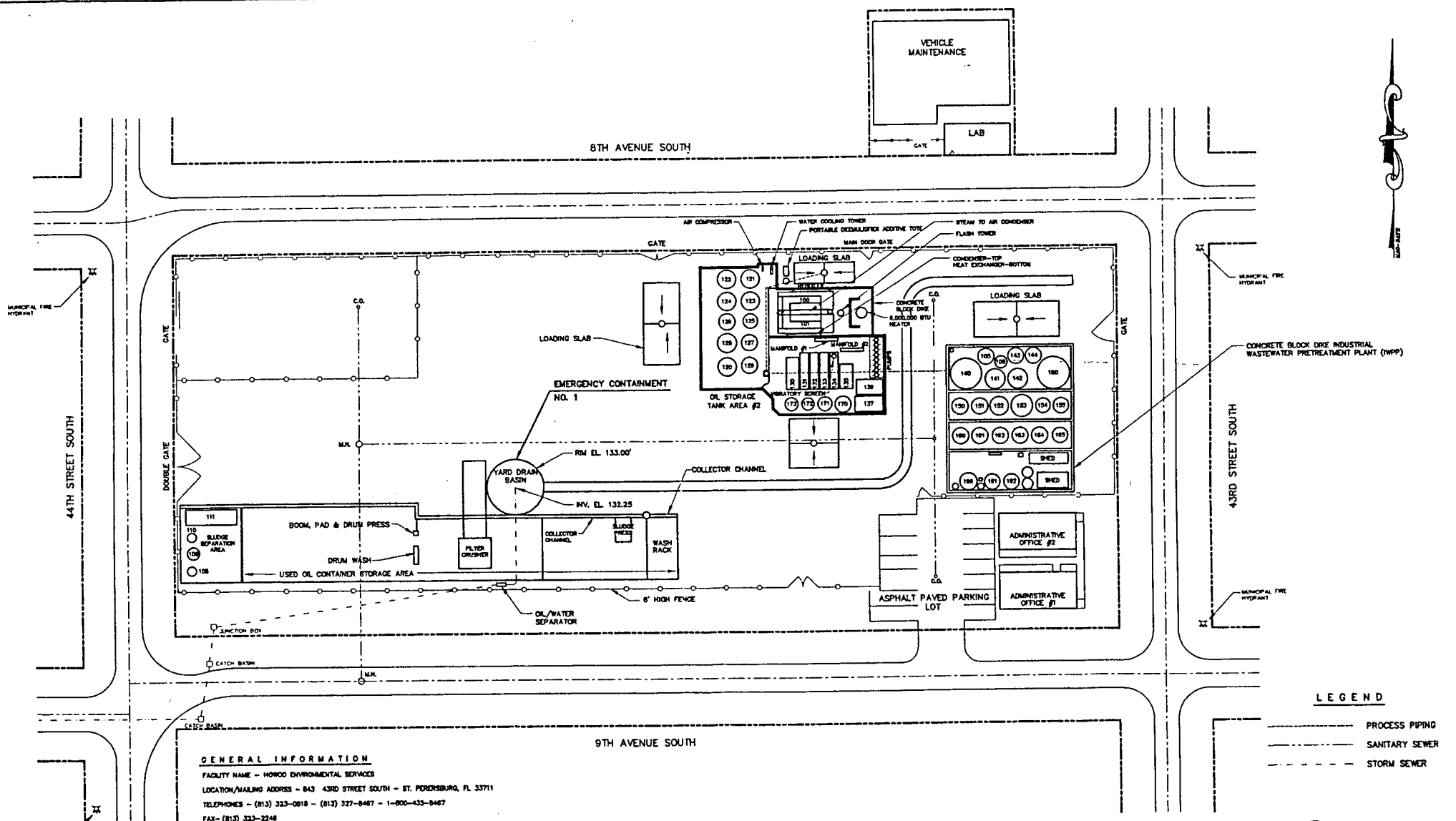
I am leaving the Department at the end of this month, so this case is being transferred to Beth Knauss. Please submit the required information to her attention and if you have any questions, please call her at (813)744-6100, extension 383.

Sincerely,

Randall H. Strauss
Environmental Specialist II
Division of Waste Management

cc: Agusta Posner, OGC
Laurel Lockett, Carlton Fields

ATTACHMENT A



GENERAL INFORMATION

FACILITY NAME – HOWCO ENVIRONMENTAL SERVICES

LOCATION/MAILING ADDRESS – 843 43RD STREET SOUTH – ST. PERERSBURG, FL 33711

TELEPHONES – (813) 323-0818 – (813) 327-8467 – 1-800-435-8467

FAX– (813) 323-2248

FACILITY EPA ID NO – FLD 152764787

STATE (EMPLOYER) ID NO. – 59-2599751

LAND AREA – 3.2 ACRES

SITE INFORMATION – NEAREST COMMUNITY – SURROUNDING AREA
NEAREST WATERWAY – 3 MILES S/SW
NEAREST BUILDING – 200 FT EACH DIRECTION
GROUNDWATER FLOW – SW
NEAREST GROUNDWATER USE – NONE WITHIN 1 MILE
PREVAILING WIND – WINTER NW TO SE – SUMMER EASTERLY
LOCATION INFORMATION – INDUSTRIAL PARK LOCATION
FLOOD INFORMATION – 100 YEAR FLOOD PLAIN

STAFF:		
	MANAGEMENT/SUPERVISION	– 6
	CLERICAL/ACCOUNTING	– 10
	PLANT OPERATIONS	– 10
	DRIVERS/FIELD	– 12
	LAB/ MAINTENANCE	– 4
	TOTAL	42

LEGEND

PROCESS PIPING
SANITARY SEWER
STORM SEWER

V. W. Djordjevic 10-19-1999

VLASTIMIR W. DJORDJEVIC PROF. ENGR.
6733 1ST AVE. SOUTH-ST. PETERSBURG, FL. 33707

SCALE: 1"=60'
DATE: DEC. 29, 1998

PROJECT

DRAWN: G.C.R.

HOWCO ENVIRONMENTAL SERVICES
843 43RD ST. SOUTH – ST. PERERSBURG FL.

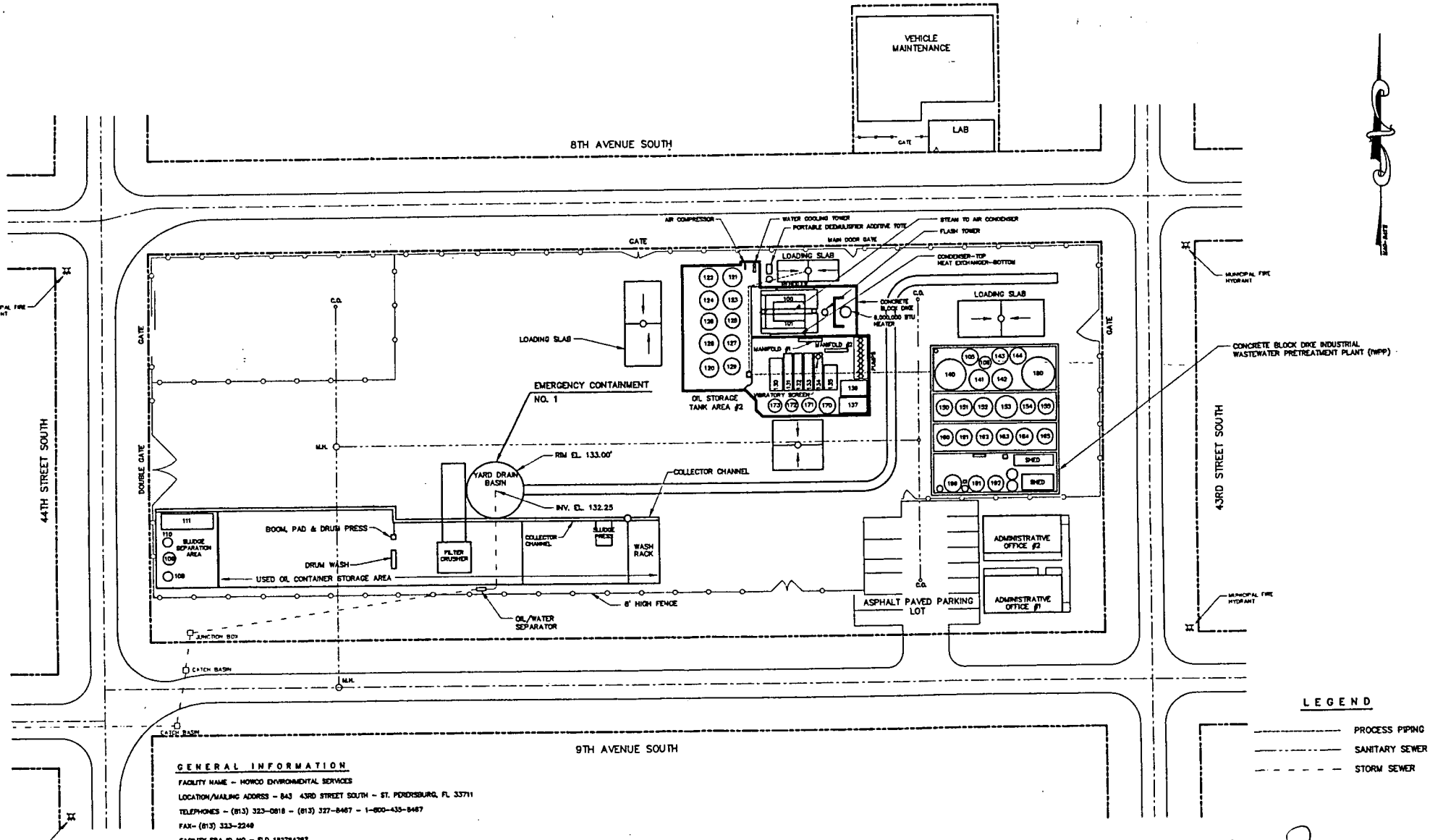
EMERGENCY CONTAINMENT NO. 1 | D-6-1

On Monday Randy S. was at Howco (10:00 am) and he observed:-

- Tanks 170-173 were removed from Containment Area #1
- No concrete was below the base of the Tanks
- Tanks sat below slab grade
- All white rock was heavily stained with oil

Violation of C.U. as

ATTACHMENT A



LEGEND

- PROCESS PIPING
- SANITARY SEWER
- STORM SEWER

GENERAL INFORMATION

FACILITY NAME – HOWCO ENVIRONMENTAL SERVICES

LOCATION/MAILING ADDRESS – 843 43RD STREET SOUTH – ST. PERERSBURG, FL 33711

TELEPHONES – (813) 323-0818 – (813) 327-8467 – 1-800-435-8467

FAX– (813) 323-2248

FACILITY EPA ID NO – FLD 183784767

STATE (EMPLOYER) ID NO. – 59-2599791

LAND AREA – 3.2 ACRES

SITE INFORMATION – NEAREST COMMUNITY – SURROUNDING AREA
NEAREST WATERWAY – 3 MILES S/SW
NEAREST BUILDING – 200 FT EACH DIRECTION
GROUNDWATER FLOW – SW
NEAREST GROUNDWATER USE – NONE WITHIN 1 MILE
PREVAILING WIND – WINTER NW TO SE – SUMMER EASTERLY
LOCATION INFORMATION – INDUSTRIAL PARK LOCATION
FLOOD INFORMATION – 100 YEAR FLOOD PLAN

STAFF:	
MANAGEMENT/SUPERVISION	– 8
CLERICAL/ACCOUNTING	– 10
PLANT OPERATIONS	– 10
DRIVERS/FIELD	– 12
LAB/ MAINTENANCE	– 4
TOTAL	42

V. W. Djordjevic 10-19-1999

VLASTIMIR W. DJORDJEVIC PROF. ENGR.
6733 1ST AVE. SOUTH–ST. PETERSBURG, FL. 33707

SCALE: 1"=60'
DATE: DEC. 29, 1998

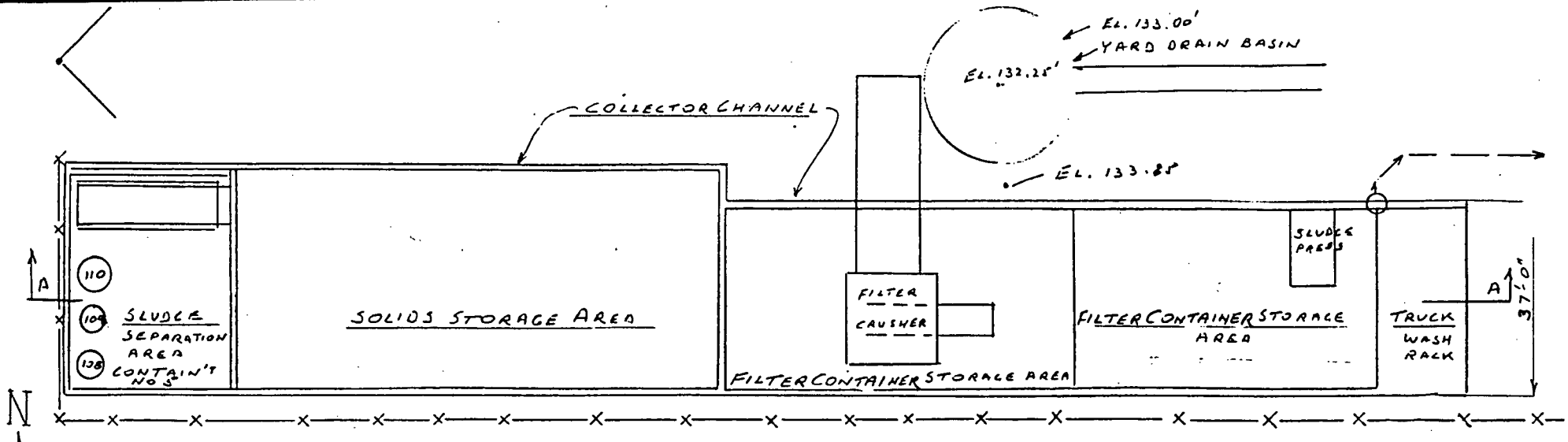
PROJECT

DRAWN: G.C.R.

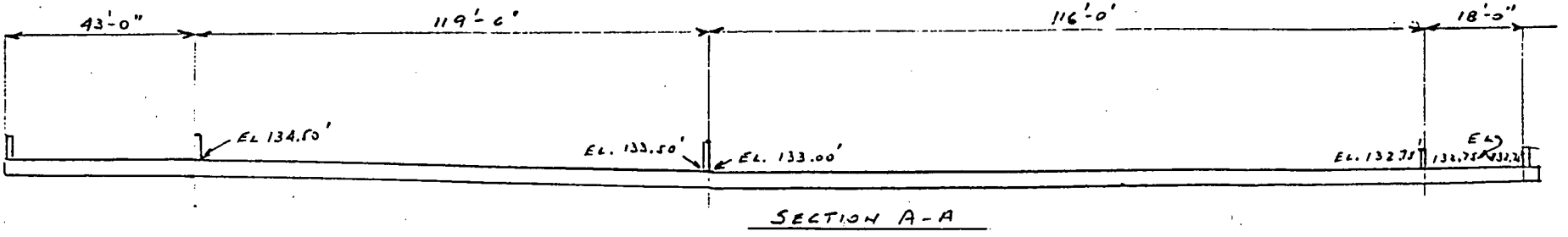
HOWCO ENVIRONMENTAL SERVICES
843 43RD ST. SOUTH – ST. PERERSBURG FL.

EMERGENCY CONTAINMENT NO. 1 | D–6–1

ATTACHMENT B



SLUDGE & FILTER PROCESSING AND TRUCK WASH RACK PAD AND COLLECTOR CHANNEL PLAN



SECTION A-A

NOTE:
THE CONCRETE PAD IN SOLIDS AND FILTER CONTAINER STORAGE AREA AND AT TRUCK WASH RACK, COLLECTOR CHANNEL AND SUMP ARE OF CONCRETE CONSTRUCTION & GENERAL POLYMERS EPOXY COATING AND ARE CERTIFIED TO BE SUFFICIENTLY IMPERVIOUS TO USED OIL

V. W. Djordjevic
10-19-1999

VLASTIMIR W. DJORDJEVIC PROF. ENGR.
6733 1ST. AVE. SOUTH – ST. PETERSBURG, FL. 33707

SCALE: NTS.	APPROVED BY: PROJECT No.	DRAWN BY V.W. DJ.
DATE: 9-15-1999		REVISED

HOWCO ENVIRONMENTAL SERVICES LTD.
843 43ED ST. SOUTH – ST. PETERSBURG, FL.

SOLIDS & FILTER PROCESSING AND TRUCK WASH RACK PAD AND COLLECTOR CHANNEL	DRAWING NUMBER 10-2

TABLE 9-2. TABULATED VALUES OF STUDENT'S "t" FOR EVALUATING SOLID WASTES

Degrees of freedom (n-1)[a]	Tabulated "t" value[b]
1	3.078
2	1.886
3	1.638
4	1.533
5	1.476
6	1.440
7	1.415
8	1.397
9	1.393
10	1.372
11	1.363
12	1.356
13	1.350
14	1.345
15	1.341
16	1.337
17	1.333
18	1.330
19	1.328
20	1.325
21	1.323
22	1.321
23	1.319
24	1.318
25	1.316
26	1.315
27	1.314
28	1.313
29	1.311
30	1.310
40	1.303
60	1.296
120	1.289
	1.282

[a]Degrees of freedom (df) are equal to the number of samples (n) collected from a solid waste less one.

[b]Tabulated "t" values are for a two-tailed confidence interval and a probability of 0.20 (the same values are applicable to a one-tailed confidence interval and a probability of 0.10).

WAIVER OF 90 DAY TIME LIMIT
UNDER SECTIONS 120.60(2) and 403.0876, FLORIDA STATUTES

License (Permit, Certification) Application No.

Applicant's Name:

With regard to the above referenced application, the applicant hereby with full knowledge and understanding of applicant's rights under Sections 120.60(2) and 403.0876, Florida Statutes, waives the right to have the application approved or denied by the State of Florida Department of Environmental Protection within the 90 day time period prescribed by law. Said waiver is made freely and voluntarily by the applicant, with full knowledge, and without any pressure or coercion by anyone employed by the State of Florida Department of Environmental Protection.

This waiver shall expire on the _____ day of _____ , 20____.

The undersigned is authorized to make this waiver on behalf of the applicant.

_____
Signature

_____
Name (Please Type or Print)

Department of Environmental Protection

Jeb Bush
Governor

Southwest District
3804 Coconut Palm Drive
Tampa, Florida 33619

David B. Struhs
Secretary

June 16, 1999

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

RE: Howco Environmental Services
EPA ID No. FLD 152 764 767
Pinellas County
OGC Case No. 97-2190

Dear Mr. Hagan:

Enclosed is the executed Consent Order in the above-referenced case. Please note the following compliance dates and actions required of Howco Environmental Services by conditions of the Consent Order:

1. The initial penalty installment payment of $1762.50 is due within 30 days of the effective date of the Consent Order. Eleven additional installment payments of $1762 50 each will be due by the last day of each following month.
2. Notification is due to the Department within 60 days of the effective date, along with the information specified in paragraph 9.a., if you intend to implement the pollution prevention project of replacing the specified underground piping at the facility with double-walled piping. If you choose not to implement the project, then a $5000.00 payment towards the civil penalty, in addition to the payments specified above, will be due within 90 days of the effective date.
3. Sampling of the wastewater treatment sludge and "OES" for TCLP analysis shall be performed within 30 days of the effective date. After the initial sampling, at least three additional quarterly analyses of these waste streams shall be performed and annual analyses thereafter. Verbal notification to the Department is required at least three days prior to each scheduled sampling event.
4. Within 60 days of the effective date pressure test the underground piping running between the sump and the storage tank in containment area #3, and within 120 days of the effective date provide certification to the Department that all the requirements specified in paragraph 10.b.(1) have been met for providing secondary containment for used oil containers, or ensure that all containers of used oil are stored within secondary containment structures consisting of a dike, berm or retaining wall and a floor that are impervious to used oil.
5. Within 30 days of the deadline after each task for upgrading the used oil tank secondary containment structures as specified in paragraphs 10.b.(2) through 10.b.(5), provide certification by a P.E. to the Department in accordance with the requirements of paragraph 10.b.(6).
6. Within 60 days of the effective date perform pressure testing on all underground piping in use for conveying used oil and/or PCW.

7. Within 21 days of the effective date publish the notice specified in paragraph 19 and provide proof of publication to the Department within 7 days after publication.

Compliance with the conditions of the Consent Order will end this enforcement case. If you have any questions, please contact me at (813) 744-6100, extension 387.

Sincerely,

Randall H. Strauss
Environmental Specialist II
Division of Waste Management

Enclosure

cc: Agusta Posner, OGC
Laurel Lockett, Carlton Fields
Susan Pelz, Solid Waste Permitting-SWD
Morgan Leibrandt, HWR-Tallahassee
Charlie Ryburn, Pinellas Co. DEM

	Waste Water WTS	OES
1 Q 7/99	ok	ok
2 Q 10/99	2 failures 2 retest ok	ok
3 Q 1/2000	~~January 4th~~	
4 Q		

Florida Department of Environmental Protection
Hazardous Waste Compliance/Enforcement Tracking System
Project Summary Report
Date: 02-DEC-1999

Project Id: 100547
Name: HOWCO ENVIRONMENTAL SERVICES INC
Reason: ENFORCEMENT
Status: OPEN **Open Date:** 16-OCT-1996 **Priority:** N
Coordinator: STRAUSS_R
Description: RCRA INSPECTION
Office: SOUTHWEST DISTRICT
County: PINELLAS

Ogc #: 972190 **Style:** HAGAN HOLDING COMPANY; DEP VS.

Attorney: AGUSTA POSNER

Completed	Activity
22-DEC-97	
22-DEC-97	AMENDED CONSENT ORDER ISSUED
22-DEC-97	
22-DEC-97	
23-FEB-98	
16-JUN-99	
16-JUL-99	
30-AUG-99	
30-SEP-99	
31-OCT-99	
30-NOV-99	
31-DEC-99	
31-JAN-00	
29-FEB-00	
31-MAR-00	
16-JUN-99	
16-JUN-99	
30-APR-00	

Program Area: HW

Date Due: **Date Complete:** **Done Date:** 16-JUN-1999 **Activity:** COE
Pats #: **Ogc #:** 97-2190 **Cond #:**
Evaluation: **Eval Results:**
Prep Notes: **Completion Notes:** CO includes penalties, 2nd contain upgrades and waste determ

Assigned to: STRAUSS_R

Date Due: **Date Complete:** **Done Date:** 16-JUN-1999 **Activity:** SNN
Pats #: **Ogc #:** 97-2190 **Cond #:**
Evaluation: **Eval Results:**
Prep Notes: **Completion Notes:** Facility RTC w/ execution of CO 6/16/99

Assigned to: STRAUSS_R

Florida Department of Environmental Protection
Hazardous Waste Compliance/Enforcement Tracking System
Project Summary Report
Date: 02-DEC-1999

Project Id: 100547
Name: HOWCO ENVIRONMENTAL SERVICES INC
Reason: ENFORCEMENT
Status: OPEN **Open Date:** 16-OCT-1996 **Priority:** N
Coordinator: STRAUSS_R
Description: RCRA INSPECTION

Program Area: HW

Date Due: **Date Complete:** **Done Date:** 14-SEP-1998 **Activity:** CALL
Pats #: **Ogc #:** **Cond #:**
Evaluation: **Eval Results:**
Prep Notes: Telecon w/ Hagan - CO due or issue NOV **Completion Notes:**

Assigned to: STRAUSS_R

Date Due: **Date Complete:** **Done Date:** 11-MAR-1998 **Activity:** DCOI
Pats #: **Ogc #:** 97-2190 **Cond #:**
Evaluation: **Eval Results:**
Prep Notes: **Completion Notes:**

Assigned to: STRAUSS_R

Date Due: **Date Complete:** **Done Date:** 06-MAR-1998 **Activity:** LTR
Pats #: **Ogc #:** **Cond #:**
Evaluation: **Eval Results:**
Prep Notes: Response to settlement offer due **Completion Notes:**

Assigned to: STRAUSS_R

Date Due: **Date Complete:** **Done Date:** 02-APR-1997 **Activity:** SNY
Pats #: **Ogc #:** **Cond #:**
Evaluation: **Eval Results:**
Prep Notes: **Completion Notes:**

Assigned to: STRAUSS_R

Date Due: 30-JUN-2000 **Date Complete:** **Done Date:** **Activity:** COND
Pats #: **Ogc #:** 97-2190 **Cond #:**
Evaluation: **Eval Results:**
Prep Notes: 12 of 12 $1762.50 payment due **Completion Notes:**

Assigned to: STRAUSS_R

Date Due: 01-JUN-2000 **Date Complete:** **Done Date:** **Activity:** COND
Pats #: **Ogc #:** 97-2190 **Cond #:**
Evaluation: **Eval Results:**
Prep Notes: Completion of application of impervious coating to contain #3 **Completion Notes:**

Florida Department of Environmental Protection
Hazardous Waste Compliance/Enforcement Tracking System
Project Summary Report
Date: 02-DEC-1999

Project Id: 100547
Name: HOWCO ENVIRONMENTAL SERVICES INC
Reason: ENFORCEMENT
Status: OPEN **Open Date:** 16-OCT-1996 **Priority:** N
Coordinator: STRAUSS_R
Description: RCRA INSPECTION

Program Area: HW

Date Due: 01-JUN-2000 **Date Complete:** **Done Date:** **Activity:** COND
Pats #: **Ogc #:** 97-2190 **Cond #:**
Evaluation: **Eval Results:**
Prep Notes: Completion of application of impervious coating to contain #3 **Completion Notes:**

Assigned to: STRAUSS_R

Date Due: 30-MAY-2000 **Date Complete:** **Done Date:** **Activity:** COND
Pats #: **Ogc #:** 97-2190 **Cond #:**
Evaluation: **Eval Results:**
Prep Notes: 11 of 12 $1762.50 payment due **Completion Notes:**

Assigned to: STRAUSS_R

Date Due: 30-APR-2000 **Date Complete:** **Done Date:** **Activity:** COND
Pats #: **Ogc #:** 97-2190 **Cond #:**
Evaluation: **Eval Results:**
Prep Notes: 10 of 12 $1762.50 payment due **Completion Notes:**

Assigned to: STRAUSS_R

Date Due: 15-APR-2000 **Date Complete:** **Done Date:** **Activity:** COND
Pats #: **Ogc #:** 97-2190 **Cond #:**
Evaluation: **Eval Results:**
Prep Notes: 4 of 4 TCLP sampling of WWTS and OES due **Completion Notes:**

Assigned to: STRAUSS_R

Date Due: 30-MAR-2000 **Date Complete:** **Done Date:** **Activity:** COND
Pats #: **Ogc #:** 97-2190 **Cond #:**
Evaluation: **Eval Results:**
Prep Notes: 9 of 12 $1762.50 payment due **Completion Notes:**

Assigned to: STRAUSS_R

Date Due: 28-FEB-2000 **Date Complete:** **Done Date:** **Activity:** COND
Pats #: **Ogc #:** 97-2190 **Cond #:**
Evaluation: **Eval Results:**
Prep Notes: 8 of 12 $1762.50 payment due **Completion Notes:**

Florida Department of Environmental Protection
Hazardous Waste Compliance/Enforcement Tracking System
Project Summary Report
Date: 02-DEC-1999

Project Id: 100547
Name: HOWCO ENVIRONMENTAL SERVICES INC
Reason: ENFORCEMENT
Status: OPEN **Open Date:** 16-OCT-1996 **Priority:** N
Coordinator: STRAUSS_R
Description: RCRA INSPECTION

Program Area: HW

Date Due: 28-FEB-2000 **Date Complete:** **Done Date:** **Activity:** COND
Pats #: **Ogc #:** 97-2190 **Cond #:**
Evaluation: **Eval Results:**
Prep Notes: 8 of 12 $1762.50 payment due **Completion Notes:**

Assigned to: STRAUSS_R

Date Due: 30-JAN-2000 **Date Complete:** **Done Date:** **Activity:** COND
Pats #: **Ogc #:** 97-2190 **Cond #:**
Evaluation: **Eval Results:**
Prep Notes: 7 of 12 $1762.50 payment due **Completion Notes:**

Assigned to: STRAUSS_R

Date Due: 15-JAN-2000 **Date Complete:** **Done Date:** **Activity:** COND
Pats #: **Ogc #:** 97-2190 **Cond #:**
Evaluation: **Eval Results:**
Prep Notes: 3 of 4 TCLP sampling of WWTS and OES due **Completion Notes:**

Assigned to: STRAUSS_R

Date Due: 01-JAN-2000 **Date Complete:** **Done Date:** **Activity:** COND
Pats #: **Ogc #:** 97-2190 **Cond #:**
Evaluation: **Eval Results:**
Prep Notes: Completion of coating contain #1 due **Completion Notes:**

Assigned to: STRAUSS_R

Date Due: 30-DEC-1999 **Date Complete:** **Done Date:** **Activity:** COND
Pats #: **Ogc #:** 97-2190 **Cond #:**
Evaluation: **Eval Results:**
Prep Notes: 6 of 12 $1762.50 payment due **Completion Notes:**
DEC 30 — WWT Sludge results due
DEC 22 — " "

Assigned to: STRAUSS_R

Date Due: 15-DEC-1999 **Date Complete:** 10 DEC 99 **Done Date:** 10 DEC 99 **Activity:** COND
Pats #: **Ogc #:** 97-2190 **Cond #:**
Evaluation: **Eval Results:**
Prep Notes: Completion of application of impervious coating to contain #2 **Completion Notes:**

Florida Department of Environmental Protection
Hazardous Waste Compliance/Enforcement Tracking System
Project Summary Report
Date: 02-DEC-1999

Project Id: 100547
Name: HOWCO ENVIRONMENTAL SERVICES INC
Reason: ENFORCEMENT
Status: OPEN **Open Date:** 16-OCT-1996 **Priority:** N
Coordinator: STRAUSS_R
Description: RCRA INSPECTION

Program Area: HW

Date Due: 15-DEC-1999 **Date Complete:** 10 DEC 99 **Done Date:** 10 DEC 99 **Activity:** COND
Pats #: **Ogc #:** 97-2190 **Cond #:**
Evaluation: **Eval Results:**
Prep Notes: Completion of application of impervious coating to contain #2 **Completion Notes:**

Assigned to: STRAUSS_R

Date Due: 30-NOV-1999 **Date Complete:** 29 NOV 99 **Done Date:** 29 NOV 99 **Activity:** COND
Pats #: **Ogc #:** 97-2190 **Cond #:**
Evaluation: **Eval Results:**
Prep Notes: 5 of 12 $1762.50 payment due **Completion Notes:**

Assigned to: STRAUSS_R

Date Due: 15-NOV-1999 **Date Complete:** 10 DEC 99 **Done Date:** 10 DEC 99 **Activity:** COND
Pats #: **Ogc #:** 97-2190 **Cond #:**
Evaluation: **Eval Results:**
Prep Notes: PE cert due of completion of UO container storage area upgrades **Completion Notes:**

Assigned to: STRAUSS_R

Date Due: 15-NOV-1999 **Date Complete:** 10 DEC 99. **Done Date:** 18 DEC 99. **Activity:** COND
Pats #: **Ogc #:** 97-2190 **Cond #:**
Evaluation: **Eval Results:**
Prep Notes: PE cert due of completion of south contain #2 upgrade **Completion Notes:**

Assigned to: STRAUSS_R

Date Due: 30-OCT-1999 **Date Complete:** 29 OCT 99. **Done Date:** 29 OCT 99 **Activity:** COND
Pats #: **Ogc #:** 97-2190 **Cond #:**
Evaluation: **Eval Results:**
Prep Notes: 4 of 12 $1762.50 payment due **Completion Notes:**

Assigned to: STRAUSS_R

Florida Department of Environmental Protection
Hazardous Waste Compliance/Enforcement Tracking System
Project Summary Report
Date: 02-DEC-1999

Project Id: 100547
Name: HOWCO ENVIRONMENTAL SERVICES INC
Reason: ENFORCEMENT
Status: OPEN **Open Date:** 16-OCT-1996 **Priority:** N
Coordinator: STRAUSS_R
Description: RCRA INSPECTION

Program Area: HW

Date Due: 15-OCT-1999 **Date Complete:** 11OCT99 **Done Date:** 11OCT99 **Activity:** COND
Pats #: **Ogc #:** 97-2190 **Cond #:**
Evaluation: **Eval Results:**
Prep Notes: 2 of 4 TCLP sampling of WWTS and OES due **Completion Notes:**

Assigned to: STRAUSS_R

Date Due: 30-SEP-1999 **Date Complete:** 24-SEP-1999 **Done Date:** 24-SEP-1999 **Activity:** COND
Pats #: **Ogc #:** 97-2190 **Cond #:**
Evaluation: **Eval Results:**
Prep Notes: 3 of 12 $1762.50 paement due **Completion Notes:**

Assigned to: STRAUSS_R

Date Due: 16-SEP-1999 **Date Complete:** 16-SEP-1999 **Done Date:** 16-SEP-1999 **Activity:** COND
Pats #: **Ogc #:** 97-2190 **Cond #:** 9.a.
Evaluation: **Eval Results:**
Prep Notes: $5000 payment due - did not elect to upgrade piping w/ 2nd containment **Completion Notes:**

Assigned to: STRAUSS_R

Date Due: 15-SEP-1999 **Date Complete:** 10 DEC99 **Done Date:** 10 DEC99 **Activity:** COND
Pats #: **Ogc #:** 97-2190 **Cond #:**
Evaluation: **Eval Results:**
Prep Notes: PE cert due of contain for Tank #110 & #111 **Completion Notes:**

Assigned to: STRAUSS_R

Date Due: 30-AUG-1999 **Date Complete:** 24-AUG-1999 **Done Date:** 24-AUG-1999 **Activity:** COND
Pats #: **Ogc #:** 97-2190 **Cond #:**
Evaluation: **Eval Results:**
Prep Notes: 2 of 12 $1762.50 payment due **Completion Notes:**

Assigned to: STRAUSS_R

Florida Department of Environmental Protection
Hazardous Waste Compliance/Enforcement Tracking System
Project Summary Report
Date: 02-DEC-1999

Project Id: 100547
Name: HOWCO ENVIRONMENTAL SERVICES INC
Reason: ENFORCEMENT
Status: OPEN **Open Date:** 16-OCT-1996 **Priority:** N
Coordinator: STRAUSS_R
Description: RCRA INSPECTION

Program Area: HW

Date Due: 15-AUG-1999 **Date Complete:** 16-SEP-1999 **Done Date:** 16-SEP-1999 **Activity:** COND
Pats #: **Ogc #:** 97-2190 **Cond #:**
Evaluation: **Eval Results:**
Prep Notes: Notification of piping upgrade due **Completion Notes:** Facility declined P2 credit for piping upgrade-paid addtl $5000

Assigned to: STRAUSS_R

Date Due: 15-AUG-1999 **Date Complete:** 25-AUG-1999 **Done Date:** 21-JUL-1999 **Activity:** COND
Pats #: **Ogc #:** 97-2190 **Cond #:**
Evaluation: **Eval Results:**
Prep Notes: Pressure test on all underground piping due **Completion Notes:** Testing performed 7/21 - results recvd SWD 8/25 - all pass

Assigned to: STRAUSS_R

Date Due: 27-JUL-1999 **Date Complete:** 21-JUL-1999 **Done Date:** 12-JUL-1999 **Activity:** COND
Pats #: **Ogc #:** 97-2190 **Cond #:**
Evaluation: **Eval Results:**
Prep Notes: TCLP sampling of WWTS and OES done 7/12 - results due **Completion Notes:**

Assigned to: STRAUSS_R

Date Due: 15-JUL-1999 **Date Complete:** 06-JUL-1999 **Done Date:** 06-JUL-1999 **Activity:** COND
Pats #: **Ogc #:** 97-2190 **Cond #:**
Evaluation: **Eval Results:**
Prep Notes: 1 of 12 $1762.50 payment due **Completion Notes:**

Assigned to: STRAUSS_R

Date Due: 13-JUL-1999 **Date Complete:** 19-JUL-1999 **Done Date:** 19-JUL-1999 **Activity:** COND
Pats #: **Ogc #:** 97-2190 **Cond #:**
Evaluation: **Eval Results:**
Prep Notes: Proof of publication due **Completion Notes:**

Assigned to: STRAUSS_R

Florida Department of Environmental Protection
Hazardous Waste Compliance/Enforcement Tracking System
Project Summary Report
Date: 02-DEC-1999

Project Id: 100547
Name: HOWCO ENVIRONMENTAL SERVICES INC
Reason: ENFORCEMENT
Status: OPEN **Open Date:** 16-OCT-1996 **Priority:** N
Coordinator: STRAUSS_R
Description: RCRA INSPECTION

Program Area: HW

Date Due: 14-MAY-1999 **Date Complete:** 10-JUN-1999 **Done Date:** 28-APR-1999 **Activity:** DCOI
Pats #: **Ogc #:** 97-2190 **Cond #:**
Evaluation: **Eval Results:**
Prep Notes: Final draft mailed 4/28 - return of signed Order due **Completion Notes:**

Assigned to: STRAUSS_R

Date Due: 27-JAN-1999 **Date Complete:** 05-FEB-1999 **Done Date:** 07-JAN-1999 **Activity:** DCOI
Pats #: **Ogc #:** 97-2190 **Cond #:**
Evaluation: **Eval Results:**
Prep Notes: Latest draft issued - response due **Completion Notes:**

Assigned to: STRAUSS_R

Date Due: 29-NOV-1998 **Date Complete:** 24-JUN-1999 **Done Date:** 29-SEP-1998 **Activity:** CEI
Pats #: **Ogc #:** **Cond #:**
Evaluation: Y **Eval Results:** SIGNIFICANT OUT-OF-C
Prep Notes: Inspection report due **Completion Notes:**

Assigned to: STRAUSS_R

Date Due: 05-JAN-1998 **Date Complete:** 06-FEB-1998 **Done Date:** 16-DEC-1997 **Activity:** LTR
Pats #: **Ogc #:** **Cond #:**
Evaluation: **Eval Results:**
Prep Notes: Settlement offer to L. Lockett 12/16 - response due **Completion Notes:** First detailed written response to WL ever received

Assigned to: STRAUSS_R

Date Due: 02-OCT-1997 **Date Complete:** 14-NOV-1997 **Done Date:** 16-SEP-1997 **Activity:** LTR
Pats #: **Ogc #:** **Cond #:**
Evaluation: **Eval Results:**
Prep Notes: Settle offer due from L. Lockett **Completion Notes:**

Assigned to: STRAUSS_R

Date Due: 23-SEP-1997 **Date Complete:** 16-SEP-1997 **Done Date:** 08-SEP-1997 **Activity:** LTR
Pats #: **Ogc #:** **Cond #:**
Evaluation: **Eval Results:**
Prep Notes: Settlement offer to L. Lockett 9/8-response due **Completion Notes:** Letter from L. Lockett-going on vacation, will respond after 9/25

Florida Department of Environmental Protection
Hazardous Waste Compliance/Enforcement Tracking System
Project Summary Report
Date: 02-DEC-1999

Project Id: 100547
Name: HOWCO ENVIRONMENTAL SERVICES INC
Reason: ENFORCEMENT
Status: OPEN **Open Date:** 16-OCT-1996 **Priority:** N
Coordinator: STRAUSS_R
Description: RCRA INSPECTION

Program Area: HW

Date Due: 23-SEP-1997 **Date Complete:** 16-SEP-1997 **Done Date:** 08-SEP-1997 **Activity:** LTR
Pats #: **Ogc #:** **Cond #:**
Evaluation: **Eval Results:**
Prep Notes: Settlement offer to L. Lockett 9/8-response due **Completion Notes:** Letter from L. Lockett-going on vacation, will respond after 9/25

Assigned to: STRAUSS_R

Date Due: 15-SEP-1997 **Date Complete:** 08-SEP-1997 **Done Date:** 16-JUL-1997 **Activity:** EMT
Pats #: **Ogc #:** **Cond #:**
Evaluation: **Eval Results:**
Prep Notes: Position letter to HOWCO due **Completion Notes:**

Assigned to: STRAUSS_R

Date Due: 15-MAY-1997 **Date Complete:** 17-APR-1997 **Done Date:** 11-APR-1997 **Activity:** CPAM
Pats #: **Ogc #:** **Cond #:**
Evaluation: **Eval Results:**
Prep Notes: PA to Tally 4/11 - review due **Completion Notes:** PA approved

Assigned to: STRAUSS_R

Date Due: 26-APR-1997 **Date Complete:** 02-MAY-1997 **Done Date:** 11-APR-1997 **Activity:** WLI
Pats #: **Ogc #:** **Cond #:**
Evaluation: **Eval Results:**
Prep Notes: Response to WL due **Completion Notes:** L. Lockett left message 5/2: will send written response 2 weeks

Assigned to: STRAUSS_R

Date Due: 02-DEC-1996 **Date Complete:** 02-APR-1997 **Done Date:** 16-OCT-1996 **Activity:** CEI
Pats #: **Ogc #:** **Cond #:**
Evaluation: Y **Eval Results:** SIGNIFICANT OUT-OF-C
Prep Notes: Inspection report due **Completion Notes:** Option 1 WL issued

Assigned to: STRAUSS_R

DEP Form#	62-710.901(d)
Form Title	Used Oil Processing Facility Permit Application
Effective Date	December 23, 1996

APPLICATION FROM FOR A USED OIL PROCESSING PERMIT

PART II - CERTIFICATION

Form 62-710.901(d) P. E. Certification [Complete when required by Chapter 471, F.S. and Rules 62-4.050, 62-761,62-762, and 62-710, F.A.C.]

Use this form to certify to the Department of Environmental Protection for:

1. Certification of secondary containment adequacy (capacity), structural integrity (structural strength), and underground process piping for storage tanks, process tanks, and container storage.
2. Certification of leak detection.
3. Substantial construction modifications.
4. Those elements of a closure plan requiring the expertise of an engineer.
5. Tank design for new or additional tanks.
6. Recertification of above items.

Please Print or Type

_____ Initial Certification _____ Recertification

1. DEP Facility ID Number: _____ 2. Tank Numbers: _____

3. Facility Name: _____

4. Facility Address: _____

This is to certify that

_____
Signature

_____
Name (please type)

Florida Registration Number: _____

Mailing Address: _____
Street or P. O. Box

_____
City State Zip

Date: _____ Telephone (__) _____

[PLEASE AFFIX SEAL]

DEP Form#	62-710.901(d)
Form Title	Used Oil Processing Facility Permit Application
Effective Date	December 23, 1996

APPLICATION FROM FOR A USED OIL PROCESSING PERMIT

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5. Tank design for new or additional tanks.
6. Recertification of above items.

Please Print or Type

_____ Initial Certification _____ Recertification

1. DEP Facility ID Number: _____ 2. Tank Numbers: _____

3. Facility Name: _____

4. Facility Address: _____

This is to certify that

_____
Signature

_____
Name (please type)

Florida Registration Number: _____

Mailing Address: _____
Street or P. O. Box

_____
City State Zip

Date: _____ Telephone ( ) _____

[PLEASE AFFIX SEAL]

DEP Form#	62-710.901(d)
Form Title	Used Oil Processing Facility Permit Application
Effective Date	December 23, 1996

APPLICATION FROM FOR A USED OIL PROCESSING PERMIT

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2. Certification of leak detection.
3. Substantial construction modifications.
4. Those elements of a closure plan requiring the expertise of an engineer.
5. Tank design for new or additional tanks.
6. Recertification of above items.

Please Print or Type

_____ Initial Certification _____ Recertification

1. DEP Facility ID Number: _____ 2. Tank Numbers: _____

3. Facility Name: _____

4. Facility Address: _____

This is to certify that

_____
Signature

_____
Name (please type)

Florida Registration Number: _____

Mailing Address: _____
Street or P. O. Box

_____
City State Zip

Date: _____ Telephone ( ) _____

[PLEASE AFFIX SEAL]

David J. Roehm
HOWCO Environmental Services
3701 Central Ave.
St. Petersburg, Fl. 33713

January 19, 2000

Rec'd by Hand Delivery 1/19/2000 Randall Strauss

Mr. Randall H. Strauss
Florida Department of Environmental Protection
Southwest District
3804 Coconut Palm Drive
Tampa, Florida 33619

RE: Quarterly Sampling
HOWCO Environmental Services
FLD 152 764 767
Pinellas County
OGC Case No. 97-2190

Dear Mr. Strauss:

Enclosed are the analytical results of the second quarterly sampling of the OES sludge (tank 111) and the Wastewater Treatment Filter Press sludge.

As previously discussed, the Wastewater Treatment Sludge at the time of the initial sampling failed to press into a good solid filter cake and had visual oil in the collection hopper. The resultant analytical data from this sample showed a benzene level above the regulated limit. The second sampling also failed for benzene and trichloroethylene.

To the best of my knowledge, the cause of these failed test results was the accumulation of small amounts of oil in the Wastewater Treatment Sludge accumulation tank. Subsequently, we emptied and flushed this tank to remove any accumulated oil and have revised procedures in the Water Plant to ensure that oil will not accumulate in this process in the future.

The results of the third and fourth sampling showed all results back below regulatory levels.

Upon disposition of the failed sludges, I will forward to you a copy of the manifest.

The third quarterly sampling has been scheduled for Wednesday, January 19, 2000 at 9:30 am. If you have any questions or concerns regarding these results, please feel free to contact me at your earliest convenience.

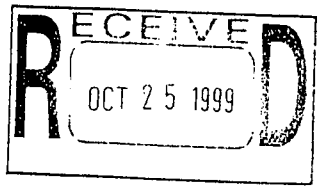
Sincerely,

David J. Roehm

cc: Tim Hagan

Enclosures

USBIOSYSTEMS



Client #: TAM-97-100315
Address: HOWCO Environmental Services
3701 Central Avenue
St. Petersburg, FL 33713
Attn: Michael Ty Pham

Date: 10/20/99
Log #: L38924-1

Sample Description:

Quarterly

Label: OES Tank 111
Date Sampled: 10/06/99
Time Sampled: 09:40
Date Received: 10/06/99
Collected By: J.Garrett

Parameter	Results	Units	Method	Reportable Limit	Extr. Date	Analysis Date	Analyst
TCLP Semivolatile Organic Compounds							
o-Cresol	BDL	mg/l	3510/8270	0.10	10/18	10/18	GM
m,p-Cresols	48	mg/l	3510/8270	0.10	10/18	10/18	GM
2,4-Dinitrotoluene	BDL	mg/l	3510/8270	0.10	10/18	10/18	GM
Hexachlorobenzene	BDL	mg/l	3510/8270	0.10	10/18	10/18	GM
Hexachlorobutadiene	BDL	mg/l	3510/8270	0.10	10/18	10/18	GM
Hexachloroethane	BDL	mg/l	3510/8270	0.10	10/18	10/18	GM
Nitrobenzene	BDL	mg/l	3510/8270	0.10	10/18	10/18	GM
Pentachlorophenol	BDL	mg/l	3510/8270	0.10	10/18	10/18	GM
Pyridine	BDL	mg/l	3510/8270	0.50	10/18	10/18	GM
2,4,5-Trichlorophenol	BDL	mg/l	3510/8270	0.80	10/18	10/18	GM
2,4,6-Trichlorophenol	BDL	mg/l	3510/8270	0.10	10/18	10/18	GM
Dilution Factor	10		3510/8270		10/18	10/18	GM
Surrogate Recoveries:							
2-Fluorophenol	25.0	%	3510/8270	21-103	10/18	10/18	GM
Phenol-d5	17.0	%	3510/8270	13-108	10/18	10/18	GM
Nitrobenzene-d5	52.0	%	3510/8270	16-112	10/18	10/18	GM
2-Fluorobiphenyl	70.0	%	3510/8270	17-115	10/18	10/18	GM
2,4,6-Tribromophenol	91.0	%	3510/8270	29-120	10/18	10/18	GM
Terphenyl-d14	89.0	%	3510/8270	35-115	10/18	10/18	GM
TCLP Metals							
Arsenic	BDL	mg/l	3010/6010	0.010	10/14	10/14	PVP
Barium	2.6	mg/l	3010/6010	0.010	10/14	10/14	PVP
Cadmium	BDL	mg/l	3010/6010	0.0050	10/14	10/14	PVP
Chromium	0.014	mg/l	3010/6010	0.0050	10/14	10/14	PVP
Lead	0.012	mg/l	3010/6010	0.0050	10/14	10/14	PVP
Selenium	0.010	mg/l	3010/6010	0.010	10/14	10/14	PVP
Silver	BDL	mg/l	3010/6010	0.010	10/14	10/14	PVP
Mercury	BDL	mg/l	7470	0.010	10/15	10/15	ZL

Client #: TAM-97-100 5
Address: HOWCO Environmental Services
3701 Central Avenue
St. Petersburg, FL 33713
Attn: Michael Ty Pham

Date: 10/20/99
Log #: L38924-1

Sample Description:

Quarterly

Label: OES Tank 111
Date Sampled: 10/06/99
Time Sampled: 09:40
Date Received: 10/06/99
Collected By: J.Garrett

Parameter	Results	Units	Method	Reportable Limit	Extr. Date	Analysis Date	Analyst
TCLP Volatile Organic Compounds							
Benzene	BDL	mg/l	5030/8260	0.10	10/15	10/15	SV
Chlorobenzene	BDL	mg/l	5030/8260	0.10	10/15	10/15	SV
Chloroform	BDL	mg/l	5030/8260	0.10	10/15	10/15	SV
Carbon Tetrachloride	BDL	mg/l	5030/8260	0.10	10/15	10/15	SV
1,2-Dichloroethane	BDL	mg/l	5030/8260	0.10	10/15	10/15	SV
1,1-Dichloroethene	BDL	mg/l	5030/8260	0.10	10/15	10/15	SV
Methyl Ethyl Ketone	BDL	mg/l	5030/8260	0.10	10/15	10/15	SV
Tetrachloroethene	BDL	mg/l	5030/8260	1.0	10/15	10/15	SV
Trichloroethene	BDL	mg/l	5030/8260	0.10	10/15	10/15	SV
Vinyl Chloride	BDL	mg/l	5030/8260	0.10	10/15	10/15	SV
1,4-Dichlorobenzene	BDL	mg/l	5030/8260	0.10	10/15	10/15	SV
Dilution Factor	1.0		5030/8260		10/15	10/15	SV
Surrogate Recoveries:							
Dibromofluoromethane	106	%	5030/8260	65-131	10/15	10/15	SV
Toluene-D8	88	%	5030/8260	67-128	10/15	10/15	SV
4-Bromofluorobenzene	115	%	5030/8260	67-134	10/15	10/15	SV
TCLP Extraction Date							
TCLP Extraction	10/13	date	1311 EXTR				SH
TCLP ZHE Extraction	10/13	date	1311 ZHE				SV
Chlorinated Herbicides - TCLP							
2,4-D	BDL	mg/l	8151	0.10	10/18	10/19	DM
2,4,5-TP	BDL	mg/l	8151	0.10	10/18	10/19	DM
Dilution Factor	1.0		8151		10/18	10/19	DM
Surrogate Recoveries:							
DCAA	93.0	%	8151	31-128	10/18	10/19	DM
Organochlorine Pesticides - TCLP							
Chlordane	BDL	mg/l	3510/8081	0.010	10/14	10/14	DM
Lindane	BDL	mg/l	3510/8081	0.0010	10/14	10/14	DM
Methoxychlor	BDL	mg/l	3510/8081	0.010	10/14	10/14	DM
Toxaphene	BDL	mg/l	3510/8081	0.060	10/14	10/14	DM
Endrin	BDL	mg/l	3510/8081	0.0020	10/14	10/14	DM
Heptachlor	BDL	mg/l	3510/8081	0.0010	10/14	10/14	DM
Heptachlor Epoxide	BDL	mg/l	3510/8081	0.0010	10/14	10/14	DM
Dilution Factor	1.0		3510/8081		10/14	10/14	DM
Surrogate Recoveries:							
TCMX	67.0	%	3510/8081	20-127	10/14	10/14	DM
Decachlorobiphenyl	32.0	%	3510/8081	24-131	10/14	10/14	DM

Client #: TAM-97-100[illegible]
Address: HOWCO Environmental Services
3701 Central Avenue
St. Petersburg, FL 33713
Attn: Michael Ty Pham

Date: 10/20/99
Log #: L38924-1

Sample Description:

Quarterly

Label: OES Tank 111
Date Sampled: 10/06/99
Time Sampled: 09:40
Date Received: 10/06/99
Collected By: J.Garrett

Parameter	Results	Units	Method	Reportable Limit	Extr. Date	Analysis Date	Analyst

Organochlorine Pesticides - TCLP (continued)

BDL = Below Reportable Limit
* Compounds are Screened Only, with an estimated detection limit.
All analyses were performed using EPA, ASTM, USGS, or Standard Methods.
All analyses were performed within EPA holding times unless otherwise noted.
Analyses are reported in dry weight unless otherwise indicated by units.

QAP# 980126
SUB DOH# 86122,86109,E86048
SC CERT# 96031001
ELPAT# 13801
VA CERT# 00395
DOH# E86240,86356
ADEM ID# 40850
TN CERT# 02985
GA CERT# 917
USDA Soil Permit# S-35240
NC CERT# 444
MA CERT# M-FL449
CT CERT# PH-0122

Respectfully submitted,

Steve Walton for
Client Technical Svcs. Manager

Client #: TAM-97-100[illegible]5
Address: HOWCO Environmental Services
3701 Central Avenue
St. Petersburg, FL 33713
Attn: Michael Ty Pham

Date: 10/20/99
Log #: L38924-2

Sample Description:

Quarterly

Label: WWT Sludge
Date Sampled: 10/06/99
Time Sampled: 10:00
Date Received: 10/06/99
Collected By: J.Garrett

Parameter	Results	Units	Method	Reportable Limit	Extr. Date	Analysis Date	Analyst
TCLP Volatile Organic Compounds							
Benzene	0.69	mg/l	5030/8260	0.10	10/15	10/15	SV
Chlorobenzene	BDL	mg/l	5030/8260	0.10	10/15	10/15	SV
Chloroform	BDL	mg/l	5030/8260	0.10	10/15	10/15	SV
Carbon Tetrachloride	BDL	mg/l	5030/8260	0.10	10/15	10/15	SV
1,2-Dichloroethane	BDL	mg/l	5030/8260	0.10	10/15	10/15	SV
1,1-Dichloroethene	BDL	mg/l	5030/8260	0.10	10/15	10/15	SV
Methyl Ethyl Ketone	BDL	mg/l	5030/8260	1.0	10/15	10/15	SV
Tetrachloroethene	BDL	mg/l	5030/8260	0.10	10/15	10/15	SV
Trichloroethene	BDL	mg/l	5030/8260	0.10	10/15	10/15	SV
Vinyl Chloride	BDL	mg/l	5030/8260	0.10	10/15	10/15	SV
1,4-Dichlorobenzene	BDL	mg/l	5030/8260	0.10	10/15	10/15	SV
Dilution Factor	1.0		5030/8260		10/15	10/15	SV
Surrogate Recoveries:							
Dibromofluoromethane	95	%	5030/8260	65-131	10/15	10/15	SV
Toluene-D8	79	%	5030/8260	67-128	10/15	10/15	SV
4-Bromofluorobenzene	105	%	5030/8260	67-134	10/15	10/15	SV
TCLP Extraction Date							
TCLP Extraction	10/13	date	1311 EXTR				SH
TCLP ZHE Extraction	10/13	date	1311 ZHE				SV
Chlorinated Herbicides - TCLP							
2,4-D	BDL	mg/l	8151	0.10	10/18	10/19	DM
2,4,5-TP	BDL	mg/l	8151	0.10	10/18	10/19	DM
Dilution Factor	1.0		8151		10/18	10/19	DM
Surrogate Recoveries:							
DCAA	116	%	8151	31-128	10/18	10/19	DM
Organochlorine Pesticides - TCLP							
Chlordane	BDL	mg/l	3510/8081	0.010	10/14	10/14	DM
Lindane	BDL	mg/l	3510/8081	0.0010	10/14	10/14	DM
Methoxychlor	BDL	mg/l	3510/8081	0.010	10/14	10/14	DM
Toxaphene	BDL	mg/l	3510/8081	0.060	10/14	10/14	DM
Endrin	BDL	mg/l	3510/8081	0.0020	10/14	10/14	DM
Heptachlor	BDL	mg/l	3510/8081	0.0010	10/14	10/14	DM
Heptachlor Epoxide	BDL	mg/l	3510/8081	0.0010	10/14	10/14	DM
Dilution Factor	1.0		3510/8081		10/14	10/14	DM
Surrogate Recoveries:							
TCMX	75.0	%	3510/8081	20-127	10/14	10/14	DM
Decachlorobiphenyl	66.0	%	3510/8081	24-131	10/14	10/14	DM

Client #: TAM-97-100__5
Address: HOWCO Environmental Services
3701 Central Avenue
St. Petersburg, FL 33713
Attn: Michael Ty Pham

Date: 10/20/99
Log #: L38924-2

Sample Description:

Quarterly

Label: WWT Sludge
Date Sampled: 10/06/99
Time Sampled: 10:00
Date Received: 10/06/99
Collected By: J.Garrett

Parameter	Results	Units	Method	Reportable Limit	Extr. Date	Analysis Date	Analyst

Organochlorine Pesticides - TCLP (continued)

BDL = Below Reportable Limit
* Compounds are Screened Only, with an estimated detection limit.
All analyses were performed using EPA, ASTM, USGS, or Standard Methods.
All analyses were performed within EPA holding times unless otherwise noted.
Analyses are reported in dry weight unless otherwise indicated by units.

QAP# 980126 | DOH# E86240,86356 | NC CERT# 444
SUB DOH# 86122,86109,E86048 | ADEM ID# 40850 | MA CERT# M-FL449
SC CERT# 96031001 | TN CERT# 02985 | CT CERT# PH-0122
ELPAT# 13801 | GA CERT# 917
VA CERT# 00395 | USDA Soil Permit# S-35240

Respectfully submitted,

Steve Walton
Client Technical Svcs. Manager

CHAIN OF CUSTODY RECORD Tan

USBIOSYSTEMS

Log# 38924 Quote# _____

LAB USE ONLY	YES	NO	N/A
Samples INTACT upon arrival?	✓		
Received ON WET ICE? Temp ____		✓	
PROPER PRESERVATIVES indicated?	✓		✓
Received WITHIN HOLDING TIMES?	✓		
CUSTODY SEALS INTACT?			•
VOLATILES rec'd W/OUT HEADSPACE?	✓		✓
PROPER CONTAINERS used?	✓		

Company Name: Howco PO#: 21041

Address: 3701 Central Ave

City: St. Petersburge State: FL Zip: 33711

Attn: David Roehm Fax#: (727)328-7782

Project Name: Quarterly Proj#:

Sampler Name/Signature: J. Curvett Phone#:

#	Sample Label / Client ID	Collection Date	Collection Time	Matrix Code*	Sample Container No.	Sample Container Size	Parameters: TCLP VOL AI	TCLP Semi VOL AI	TCLP Metal AI	TCLP Pest/Herb AI	(5 Days 3hr)	Field Filtered (Y/N)	Integrity OK (Y/N)
01	OCS Tank #1	10/6	09:40	SL	3	85/40ml	X	X	X	X			
02	WWT Sludge	↓	10:00	SL			X	X	X	X			
03													
04													
05													
06													
07													
08													
09													
10													

ORIGINAL

Matrix Codes*

SD	Solid Waste	OL	Oil
GW	Ground Water	SL	Sludge
EFF	Effluent	SO	Soil Sediment
AFW	Analyte Free H_2O	AQ	Aqueous
WW	Waste Water	NA	Nonaqueous
DW	Drinking Water	PE	Petroleum
SU	Surface Water	O	Other (Please Specify)

Pres/Codes

A. None	G. $Na_2S_2O_3$
B. HNO_3	H. $NaHSO_4$
C. H_2SO_4	I. Ice
D. NaOH	J. MCAA
E. HCL	O. Other
F. MeOH	

REMARKS

STANDARD REQUESTED TURNAROUND: (Y/N) Y | Date required: 5-7 Days | Short Hold: Y ____ N ✓

QA/QC Report Level: None ____ 1 ____ 2 ____ 3 ____ Other ____

COC OK: Y N | Initials: JK

Specific State Certification Required:

Coolers #'s	Item	Relinquished by	Date	Time	Received by	Date	Time
____ ____	01-02	[signature]	10-6-99	17:00	ICE [signature]	10-6-99	17:00
____ ____					[signature]	10/12/99	09-

Ballers #____

3231 N.W. 7th Avenue
Boca Raton, FL 33431
888-862-LABS
561-447-7373
888-456-4846 Fax
561-447-6136 Fax

C.O.C. # 512414

USBIOSYSTEMS

RECEIVED
NOV 0 1 1999

Client #: TAM-97-100315
Address: HOWCO Environmental Services
3701 Central Avenue
St. Petersburg, FL 33713
Attn: Michael Ty Pham

Page: Page 1 of 1
Date: 10/28/99
Log #: L39185-1

Sample Description:

Relog of L39185
Quarterly

Label: WWT Sludge
Date Sampled:
Time Sampled:
Date Received: 10/22/99
Collected By: Client

Parameter	Results	Units	Method	Reportable Limit	Extr. Date	Analysis Date	Analyst
TCLP BTEX Compounds							
Benzene	0.58	mg/l	5030/8260	0.10	10/27	10/27	SV
Dilution Factor	1.0		5030/8260		10/27	10/27	SV
Surrogate Recoveries:							
Dibromofluoromethane	82.0	%	5030/8260	65-131	10/27	10/27	SV
Toluene-d8	78.0	%	5030/8260	67-128	10/27	10/27	SV
4-Bromofluorobenzene	93.0	%	5030/8260	67-134	10/27	10/27	SV
TCLP Extraction Date							
TCLP ZHE Extraction	10/26	date	1311 ZHE				SV

BDL = Below Reportable Limit
* Compounds are Screened Only, with an estimated detection limit.
All analyses were performed using EPA, ASTM, USGS, or Standard Methods.
All analyses were performed within EPA holding times unless otherwise noted.
Analyses are reported in dry weight unless otherwise indicated by units.

QAP# 980126
SUB DOH# 86122,86109,E86048
SC CERT# 96031001
ELPAT# 13801
VA CERT# 00395
DOH# E86240,86356
ADEM ID# 40850
TN CERT# 02985
GA CERT# 917
USDA Soil Permit# S-35240
NC CERT# 444
MA CERT# M-FL449
CT CERT# PH-0122

Respectfully submitted,

Thomas Helton, Jr.
Project Manager

BEST AVAILABLE COPY

CHAIN OF CUSTODY RECORD

USBIOSYSTEMS

Log# 39185

Quote# TAM-97-100315

LAB USE ONLY

	YES	NO	N/A
Samples INTACT upon arrival?			
Received ON WET ICE? Temp ___			
PROPER PRESERVATIVES indicated?			
Received WITHIN HOLDING TIMES?			
CUSTODY SEALS INTACT?			
VOLATILES rec'd W/OUT HEADSPACE?			
PROPER CONTAINERS used?			

Company Name: Howco

PO#:

Address:

City: Tampa State: Zip:

Attn: David Roehm Fax#:

Project Name: 138924-2 Proj#:

Sampler Name/Signature: E J. Garrett Phone#:

#	Sample Label (client ID)	Collected Date	Collected Time	Matrix Code*	Sample Container Nos	Sample Container Size	Parameters: Sample	Parameters: pH	Parameters: Pres Codes	Parameters: TCLP Benzene	Field Filtered (Y/N)	Integrity OK (Y/N)
1	WWT SLUDGE	—	1000	SL	1	8SJ				X		
2												
3												
4												
5												
6												
7												
8												
9												
10												

Matrix Codes*

SD	Solid Waste	OL	Oil
GW	Ground Water	SL	Sludge
EFF	Effluent	SO	Soil Sediment
AFW	Analyte Free H_2O	AQ	Aqueous
WW	Waste Water	NA	Nonaqueous
DW	Drinking Water	PE	Petroleum
SU	Surface Water	O	Other (Please Specify)

Pres/Codes

A. None	G. $Na_2S_2O_3$
B. HNO_3	H. NaHSO
C. H_2SO_4	I. ICE
D. NaOH	J. MCAA
E. HCL	O. Other
F. MeOH	

REMARKS

Re-run for confiemation

NO% SOLIDS.

T.A.T. REQUEST: STANDARD / RUSH

Y/N ____ Date required

Short Hold: Y____ N____

QA/QC Report Level: None ____ 1 ____ 2 ____ 3 ____ Other ____

COC OK: Y N

Initials:

Specific State Certification Required:

Coolers #'s	Item	Relinquished by	Date	Time	Received by	Date	Time
____ ____ ____ ____	1-		10/2/99	945			
Ballers #____							

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Boca Raton, FL 33431
888-862-LABS
561-447-7373
888-456-4846 Fax
561-447-6136 Fax

ORIGINAL

USBIOSYSTEMS

Client #: TAM-97-100315
Address: HOWCO Environmental Services
3701 Central Avenue
St. Petersburg, FL 33713
Attn: Michael Ty Pham

Page: Page 1 of 2
Date: 12/06/99
Log #: L39889-1

Sample Description:

Wastewater Sludge 112299
Proj.#: 112299

Label: WWS-112299
Date Sampled: 11/22/99
Time Sampled: 09:45
Date Received: 11/22/99
Collected By: C. Brush

Parameter	Results	Units	Method	Reportable Limit	Extr. Date	Analysis Date	Analyst
TCLP Semivolatile Organic Compounds							
o-Cresol	BDL	mg/l	3510/8270	0.050	12/02	12/06	GM
m,p-Cresols	26	mg/l	3510/8270	0.050	12/02	12/06	GM
2,4-Dinitrotoluene	BDL	mg/l	3510/8270	0.050	12/02	12/06	GM
Hexachlorobenzene	BDL	mg/l	3510/8270	0.050	12/02	12/06	GM
Hexachlorobutadiene	BDL	mg/l	3510/8270	0.050	12/02	12/06	GM
Hexachloroethane	BDL	mg/l	3510/8270	0.050	12/02	12/06	GM
Nitrobenzene	BDL	mg/l	3510/8270	0.050	12/02	12/06	GM
Pentachlorophenol	BDL	mg/l	3510/8270	0.050	12/02	12/06	GM
Pyridine	BDL	mg/l	3510/8270	0.25	12/02	12/06	GM
2,4,5-Trichlorophenol	BDL	mg/l	3510/8270	0.40	12/02	12/06	GM
2,4,6-Trichlorophenol	BDL	mg/l	3510/8270	0.050	12/02	12/06	GM
Dilution Factor	5.0		3510/8270	0.050	12/02	12/06	GM
Surrogate Recoveries:							
2-Fluorophenol	22.0	%	3510/8270	21-103	12/02	12/06	GM
Phenol-d5	18.0	%	3510/8270	13-108	12/02	12/06	GM
Nitrobenzene-d5	38.0	%	3510/8270	16-112	12/02	12/06	GM
2-Fluorobiphenyl	51.0	%	3510/8270	17-115	12/02	12/06	GM
2,4,6-Tribromophenol	74.0	%	3510/8270	29-120	12/02	12/06	GM
Terphenyl-d14	64.0	%	3510/8270	35-115	12/02	12/06	GM
TCLP Metals							
Arsenic	BDL	mg/l	3010/6010	0.10	12/01	12/01	PVP
Barium	2.4	mg/l	3010/6010	0.10	12/01	12/01	PVP
Cadmium	BDL	mg/l	3010/6010	0.10	12/01	12/01	PVP
Chromium	BDL	mg/l	3010/6010	0.10	12/01	12/01	PVP
Lead	BDL	mg/l	3010/6010	0.50	12/01	12/01	PVP
Selenium	BDL	mg/l	3010/6010	1.0	12/01	12/01	PVP
Silver	BDL	mg/l	3010/6010	0.50	12/01	12/01	PVP
Mercury	BDL	mg/l	7471	0.010	12/01	12/01	ZL

Client #: TAM-97-100 5
Address: HOWCO Environmental Services
3701 Central Avenue
St. Petersburg, FL 33713
Attn: Michael Ty Pham

Date: 12/06/99
Log #: L39889-1

Sample Description:

Wastewater Sludge 112299
Proj.#: 112299

Label: WWS-112299
Date Sampled: 11/22/99
Time Sampled: 09:45
Date Received: 11/22/99
Collected By: C. Brush

Parameter	Results	Units	Method	Reportable Limit	Extr. Date	Analysis Date	Analyst
TCLP Volatile Organic Compounds							
Benzene	0.57	mg/l	5030/8260	0.10	12/01	12/01	SV
Chlorobenzene	BDL	mg/l	5030/8260	0.10	12/01	12/01	SV
Chloroform	BDL	mg/l	5030/8260	0.10	12/01	12/01	SV
Carbon Tetrachloride	BDL	mg/l	5030/8260	0.10	12/01	12/01	SV
1,2-Dichloroethane	BDL	mg/l	5030/8260	0.10	12/01	12/01	SV
1,1-Dichloroethene	BDL	mg/l	5030/8260	0.10	12/01	12/01	SV
Methyl Ethyl Ketone	BDL	mg/l	5030/8260	1.0	12/01	12/01	SV
Tetrachloroethene	BDL	mg/l	5030/8260	0.10	12/01	12/01	SV
Trichloroethene	2.0	mg/l	5030/8260	0.10	12/01	12/01	SV
Vinyl Chloride	BDL	mg/l	5030/8260	0.10	12/01	12/01	SV
1,4-Dichlorobenzene	BDL	mg/l	5030/8260	0.10	12/01	12/01	SV
Dilution Factor	1.0		5030/8260		12/01	12/01	SV
Surrogate Recoveries:							
Dibromofluoromethane	97	%	5030/8260	65-131	12/01	12/01	SV
Toluene-D8	86	%	5030/8260	67-128	12/01	12/01	SV
4-Bromofluorobenzene	88	%	5030/8260	67-134	12/01	12/01	SV
TCLP Extraction Date							
TCLP Extraction	11/30	date	1311 EXTR				SH
TCLP ZHE Extraction	11/30	date	1311 ZHE				SV

BDL = Below Reportable Limit
* Compounds are Screened Only, with an estimated detection limit.
All analyses were performed using EPA, ASTM, USGS, or Standard Methods.
All analyses were performed within EPA holding times unless otherwise noted.
Analyses are reported in dry weight unless otherwise indicated by units.

QAP# 980126
SUB DOH# 86122,86109,E86048
SC CERT# 96031001
ELPAT# 13801
VA CERT# 00395
DOH# E86240,86356
ADEM ID# 40850
TN CERT# 02985
GA CERT# 917
USDA Soil Permit# S-35240
NC CERT# 444
MA CERT# M-FL449
CT CERT# PH-0122

Respectfully submitted,

Thomas Helton, Jr.
Project Manager

BEST AVAILABLE COPY

CHAIN OF CUSTODY RECORD

USBIOSYSTEMS

Log# 39889 Quote#

Company Name	Howco Env. PO# 21426
Address	3701 CENTRAL AVE.
City	ST. PETERSBURG State FL Zip 33713
Attn:	MICHAEL PHAM Fax#
Project Name	Waste H2O SW Dist 112299 Proj# 112299
Sampler Name/Signature	C. Bur Phone#

#	Sample Label (Client ID)*	Collect Date	Collect Time	Matrix Code*	Sample Container No.	Sample Container Size
1	WWS-112299	11/22/99	9:45	SL	3	4oz, 80z
2						
3						
4						
5						
6						
7						
8						
9						
10						

LAB ANALYSIS

Parameters	Sample pH	Pres Codes	Field Filtered (Y/N)	Integrity OK (Y/N)
TCLP-Metals	ON SOIL	AZ		
TCLP-Volatiles		HZ		
TCLP-Semi-Volatiles		HT		
F/S Time 1hr				

LAB USE ONLY

	YES	NO	N/A
Samples INTACT upon arrival?	✓		
Received ON WET ICE? Temp ____			✓
PROPER PRESERVATIVES indicated?	✓		
Received WITHIN HOLDING TIMES?	✓		
CUSTODY SEALS INTACT?			✓
VOLATILES rec'd W/OUT HEADSPACE?			✓
PROPER CONTAINERS used?	✓		

Matrix Codes*

SD	Solid Waste	OL	Oil
GW	Ground Water	SL	Sludge
EFF	Effluent	SO	Soil Sediment
AFW	Analyte Free H_2O	AQ	Aqueous
WW	Waste Water	NA	Nonaqueous
DW	Drinking Water	PE	Petroleum
SU	Surface Water	O	Other (Please Specify)

Pres/Codes

A. None	G. $Na_2S_2O_3$
B. HNO_3	H. NaHSO
C. H_2SO_4	I. Ice
D. NaOH	J. MCAA
E. HCL	O. Other
F. MeOH	

REMARKS

NO % SOLID.

TURNAROUND REQUEST: STANDARD 12/2/99 Y/N; RUSH Date required

Short Hold: Y ____ N ✓

QA/QC Report Level: None ✓ 1 ____ 2 ____ 3 ____ Other ____

COC OK: Y N

Initials: CB

Specific State Certification Required: FL.

Coolers #'s	Item #	Relinquished by	Date	Time	Received by	Date	Time
	1		11/22/99	1000		11/22/99	1000
	1		11/22/99	1700		11/22/99	1700
Bailers						11/23/99	830
#							

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Boca Raton, FL 33431
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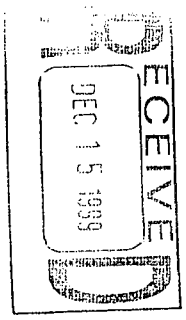
561-447-7373
888-456-4846 Fax
561-447-6136 Fax

USBIOSYSTEMS



Client #: TAM-97-100315
Address: HOWCO Environmental Services
3701 Central Avenue
St. Petersburg, FL 33713
Attn: Michael Ty Pham

Page: Page 1 of 2
Date: 12/10/1999
Log #: L40008-1

Sample Description:

Facility
Proj.#: 113099

Label: WWT-Sludge 113099
Date Sampled: 11/30/1999
Time Sampled: 09:45
Date Received: 11/30/1999
Collected By: C.Brush

Parameter	Results	Units	Method	Reportable Limit	Extr. Date	Analysis Date	Analyst
TCLP Semivolatile Organic Compounds							
o-Cresol	BDL	mg/l	1311/8270	0.050	12/09	12/10	GM
m,p-Cresols	32	mg/l	1311/8270	0.050	12/09	12/10	GM
2,4-Dinitrotoluene	BDL	mg/l	1311/8270	0.050	12/09	12/10	GM
Hexachlorobenzene	BDL	mg/l	1311/8270	0.050	12/09	12/10	GM
Hexachlorobutadiene	BDL	mg/l	1311/8270	0.050	12/09	12/10	GM
Hexachloroethane	BDL	mg/l	1311/8270	0.050	12/09	12/10	GM
Nitrobenzene	BDL	mg/l	1311/8270	0.050	12/09	12/10	GM
Pentachlorophenol	BDL	mg/l	1311/8270	0.050	12/09	12/10	GM
Pyridine	BDL	mg/l	1311/8270	0.25	12/09	12/10	GM
2,4,5-Trichlorophenol	BDL	mg/l	1311/8270	0.40	12/09	12/10	GM
2,4,6-Trichlorophenol	BDL	mg/l	1311/8270	0.050	12/09	12/10	GM
Dilution Factor	5.0		1311/8270		12/09	12/10	GM
Surrogate Recoveries:							
2-Fluorophenol	21.0	%	1311/8270	21-103	12/09	12/10	GM
Phenol-d5	17.0	%	1311/8270	13-108	12/09	12/10	GM
Nitrobenzene-d5	32.0	%	1311/8270	16-112	12/09	12/10	GM
2-Fluorobiphenyl	43.0	%	1311/8270	17-115	12/09	12/10	GM
2,4,6-Tribromophenol	60.0	%	1311/8270	29-120	12/09	12/10	GM
Terphenyl-d14	89.0	%	1311/8270	35-115	12/09	12/10	GM
TCLP Metals							
Arsenic	BDL	mg/l	3010/6010	0.10	12/06	12/06	PVP
Barium	1.7	mg/l	3010/6010	0.0050	12/06	12/06	PVP
Cadmium	BDL	mg/l	3010/6010	0.0050	12/06	12/06	PVP
Chromium	0.031	mg/l	3010/6010	0.0050	12/06	12/06	PVP
Lead	0.011	mg/l	3010/6010	0.10	12/06	12/06	PVP
Selenium	BDL	mg/l	3010/6010	0.10	12/06	12/06	PVP
Silver	BDL	mg/l	3010/6010	0.10	12/06	12/06	PVP
Mercury	BDL	mg/l	7470	0.010	12/06	12/06	ZL

Client #: TAM-97-10 5
Address: HOWCO Environmental Services
3701 Central Avenue
St. Petersburg, FL 33713
Attn: Michael Ty Pham

Page: Page 2 of 2
Date: 12/10/1999
Log #: L40008-1

Sample Description:

Facility
Proj.#: 113099

Label: WWT-Sludge 113099
Date Sampled: 11/30/1999
Time Sampled: 09:45
Date Received: 11/30/1999
Collected By: C.Brush

Parameter	Results	Units	Method	Reportable Limit	Extr. Date	Analysis Date	Analyst
TCLP Volatile Organic Compounds							
Benzene	0.21	mg/l	5030/8260	0.10	12/02	12/02	SV
Chlorobenzene	BDL	mg/l	5030/8260	0.10	12/02	12/02	SV
Chloroform	BDL	mg/l	5030/8260	0.10	12/02	12/02	SV
Carbon Tetrachloride	BDL	mg/l	5030/8260	0.10	12/02	12/02	SV
1,2-Dichloroethane	BDL	mg/l	5030/8260	0.10	12/02	12/02	SV
1,1-Dichloroethene	BDL	mg/l	5030/8260	0.10	12/02	12/02	SV
Methyl Ethyl Ketone	BDL	mg/l	5030/8260	0.10	12/02	12/02	SV
Tetrachloroethene	BDL	mg/l	5030/8260	1.0	12/02	12/02	SV
Trichloroethene	BDL	mg/l	5030/8260	0.10	12/02	12/02	SV
Vinyl Chloride	BDL	mg/l	5030/8260	0.10	12/02	12/02	SV
1,4-Dichlorobenzene	BDL	mg/l	5030/8260	0.10	12/02	12/02	SV
Dilution Factor	1.0		5030/8260		12/02	12/02	SV
Surrogate Recoveries:							
Dibromofluoromethane	107	%	5030/8260	65-131	12/02	12/02	SV
Toluene-D8	91	%	5030/8260	67-128	12/02	12/02	SV
4-Bromofluorobenzene	96	%	5030/8260	67-134	12/02	12/02	SV
TCLP Extraction Date							
TCLP Extraction	12/02	date	1311 EXTR				SH
TCLP ZHE Extraction	12/01	date	1311 ZHE				SV

BDL = Below Reportable Limit
* Compounds are Screened Only, with an estimated detection limit.
All analyses were performed using EPA, ASTM, USGS, or Standard Methods.
All analyses were performed within EPA holding times unless otherwise noted.
Analyses are reported in dry weight unless otherwise indicated by units.

QAP# 980126
SUB DOH# 86122,86109,E86048
SC CERT# 96031001
ELPAT# 13801
VA CERT# 00395
DOH# E86240,86356
ADEM ID# 40850
TN CERT# 02985
GA CERT# 917
USDA Soil Permit# S-35240
NC CERT# 444
MA CERT# M-FL449
CT CERT# PH-0122

Respectfully submitted,

Thomas Helton, Jr.
Project Manager

CHAIN OF CUSTODY RECORD

USBIOSYSTEMS

Log# 40008

Quote#

LAB USE ONLY	YES	NO	N/A
Samples INTACT upon arrival?			
Received ON WET ICE? Temp 4c	✓		
PROPER PRESERVATIVES indicated?			✓
Received WITHIN HOLDING TIMES?			✓
CUSTODY SEALS INTACT?	✓		
VOLATILES rec'd W/OUT HEADSPACE?			✓
PROPER CONTAINERS used?	✓		

Company Name: HOWCO ENV. PO# 21430

Address: 3701 CENTRAL AVE

City: ST PETERSBURG State: FL Zip: 33713

Attn: MICHAEL PHAM Fax# 727 328 7782

Project Name: FACILITY Proj# 113099

Sampler Name/Signature: C. B Phone#

	Sample Label (Client ID)	Date Collected	Time Collected	Matrix Code*	Sample Container Nb.	Size	Parameters: Sample ID	pH	Pres. Codes	TCLP VOL	TCLP semi VOL	TCLP Metal	5 Day Time Lab	Field Filtered (Y/N)	Integrity OK (Y/N)
01	wastewater (WWT-Sludge 113099)	11/30	9:45	SL	3	8oz	NP SOIL		AI	X	X	X	X		
02															
03															
04															
05															
06															
07															
08															
09															
10															

Matrix Codes*

SD	Solid Waste	OL	Oil
GW	Ground Water	SL	Sludge
EFF	Effluent	SO	Soil Sediment
AFW	Analyte Free H_2O	AQ	Aqueous
WW	Waste Water	NA	Nonaqueous
DW	Drinking Water	PE	Petroleum
SU	Surface Water	O	Other (Please Specify)

Pres/Codes

A. None	G. $Na_2S_2O_3$
B. HNO_3	H. $NaHSO_4$
C. H_2SO_4	I. Ice
D. NaOH	J. MCAA
E. HCL	O. Other
F. MeOH	

REMARKS

TCLP = NO % SOLIDS

TAT: STANDARD (Y/N) | Date required: 12/10/99 | Short Hold: Y ____ N ✓ | QA/QC Report Level: None ✓ 1 ____ 2 ____ 3 ____ Other ____ | COC OK (Y/N): Y | Initials: [illegible] | Specific State Certification Required:

Coolers #'s	Item	Relinquished by	Date	Time	Received by	Date	Time
	01	[signature]	11/30/99	10:00	[signature]	11/30	10:00
						12/1/99	15-

Ballers #

3231 N.W. 7th Avenue
Boca Raton, FL 33431
888-862-LABS
561-447-7373
888-456-4846 Fax
561-447-6136 Fax

C.O.C. # 512114

USBIOSYSTEMS

Client #: TAM-97-100315
Address: HOWCO Environmental Services
3701 Central Avenue
St. Petersburg, FL 33713
Attn: Angelo Pousa

Date: 12/30/1999
Log #: L40507-1

Sample Description:

WWT Filter

Label: WWT Filter
Date Sampled: 12/20/1999
Time Sampled: 09:30
Date Received: 12/20/1999
Collected By: C.Brush

Parameter	Results	Units	Method	Reportable Limit	Extr. Date	Analysis Date	Analyst
TCLP Semivolatile Organic Compounds							
o-Cresol	BDL	mg/l	3510/8270	0.050	12/27	12/29	GM
m,p-Cresols	BDL	mg/l	3510/8270	0.050	12/27	12/29	GM
2,4-Dinitrotoluene	BDL	mg/l	3510/8270	0.050	12/27	12/29	GM
Hexachlorobenzene	BDL	mg/l	3510/8270	0.050	12/27	12/29	GM
Hexachlorobutadiene	BDL	mg/l	3510/8270	0.050	12/27	12/29	GM
Hexachloroethane	BDL	mg/l	3510/8270	0.050	12/27	12/29	GM
Nitrobenzene	BDL	mg/l	3510/8270	0.050	12/27	12/29	GM
Pentachlorophenol	BDL	mg/l	3510/8270	0.050	12/27	12/29	GM
Pyridine	BDL	mg/l	3510/8270	0.25	12/27	12/29	GM
2,4,5-Trichlorophenol	BDL	mg/l	3510/8270	0.40	12/27	12/29	GM
2,4,6-Trichlorophenol	BDL	mg/l	3510/8270	0.050	12/27	12/29	GM
Dilution Factor	5.0		3510/8270		12/27	12/29	GM
Surrogate Recoveries:							
2-Fluorophenol	36.0	%	3510/8270	21-103	12/27	12/29	GM
Phenol-d5	24.0	%	3510/8270	13-108	12/27	12/29	GM
Nitrobenzene-d5	83.0	%	3510/8270	16-112	12/27	12/29	GM
2-Fluorobiphenyl	89.0	%	3510/8270	17-115	12/27	12/29	GM
2,4,6-Tribromophenol	93.0	%	3510/8270	29-120	12/27	12/29	GM
Terphenyl-d14	113	%	3510/8270	35-115	12/27	12/29	GM
TCLP Metals							
Arsenic	0.013	mg/l	3010/6010	0.010	12/28	12/28	PVP
Barium	2.1	mg/l	3010/6010	0.010	12/28	12/28	PVP
Cadmium	BDL	mg/l	3010/6010	0.010	12/28	12/28	PVP
Chromium	0.022	mg/l	3010/6010	0.010	12/28	12/28	PVP
Lead	BDL	mg/l	3010/6010	0.010	12/28	12/28	PVP
Selenium	BDL	mg/l	3010/6010	0.010	12/28	12/28	PVP
Silver	BDL	mg/l	3010/6010	0.010	12/28	12/28	PVP
Mercury	BDL	mg/l	7470	0.010	12/29	12/29	WM

Client #: TAM-97-100 5
Address: HOWCO Environmental Services
3701 Central Avenue
St. Petersburg, FL 33713
Attn: Angelo Pousa

Date: 12/30/1999
Log #: L40507-1

Sample Description:

WWT Filter

Label: WWT Filter
Date Sampled: 12/20/1999
Time Sampled: 09:30
Date Received: 12/20/1999
Collected By: C.Brush

Parameter	Results	Units	Method	Reportable Limit	Extr. Date	Analysis Date	Analyst
TCLP Volatile Organic Compounds							
Benzene	0.39	mg/l	5030/8260	0.10	12/27	12/27	SV
Chlorobenzene	BDL	mg/l	5030/8260	0.10	12/27	12/27	SV
Chloroform	BDL	mg/l	5030/8260	0.10	12/27	12/27	SV
Carbon Tetrachloride	BDL	mg/l	5030/8260	0.10	12/27	12/27	SV
1,2-Dichloroethane	BDL	mg/l	5030/8260	0.10	12/27	12/27	SV
1,1-Dichloroethene	BDL	mg/l	5030/8260	0.10	12/27	12/27	SV
Methyl Ethyl Ketone	BDL	mg/l	5030/8260	1.0	12/27	12/27	SV
Tetrachloroethene	BDL	mg/l	5030/8260	0.10	12/27	12/27	SV
Trichloroethene	BDL	mg/l	5030/8260	0.10	12/27	12/27	SV
Vinyl Chloride	BDL	mg/l	5030/8260	0.10	12/27	12/27	SV
1,4-Dichlorobenzene	BDL	mg/l	5030/8260	0.10	12/27	12/27	SV
Dilution Factor	1.0		5030/8260		12/27	12/27	SV
Surrogate Recoveries:							
Dibromofluoromethane	96	%	5030/8260	65-131	12/27	12/27	SV
Toluene-D8	99	%	5030/8260	67-128	12/27	12/27	SV
4-Bromofluorobenzene	94	%	5030/8260	67-134	12/27	12/27	SV
TCLP Extraction Date							
TCLP Extraction	12/27	date	1311 EXTR				SH
TCLP ZHE Extraction	12/23	date	1311 ZHE				SV

BDL = Below Reportable Limit
* Compounds are Screened Only, with an estimated detection limit.
All analyses were performed using EPA, ASTM, USGS, or Standard Methods.
All analyses were performed within EPA holding times unless otherwise noted.
Analyses are reported in dry weight unless otherwise indicated by units.

QAP# 980126
SUB DOH# 86122,86109,E86048
SC CERT# 96031001
ELPAT# 13801
VA CERT# 00395
DOH# E86240,86356
ADEM ID# 40850
TN CERT# 02985
GA CERT# 917
USDA Soil Permit# S-35240
NC CERT# 444
MA CERT# M-FL449
CT CERT# PH-0122

Respectfully submitted,

Steve Walton
Client Technical Svcs. Manager

CHAIN OF CUSTODY RECORD

USBIOSYSTEMS

Log # 40504507 Quote: _____

LAB USE ONLY	YES	NO	N/A
Samples INTACT upon arrival?	✓		
Received ON WET ICE? Temp 5C			
PROPER PRESERVATIVES indicated?			
Received WITHIN HOLDING TIME?	✓		
CUSTODY SEALS INTACT?			
VOLATILES rec'd W/OUT HEADSPACE?			
PROPER CONTAINERS used?	✓		

Company Name: Howco PO#: 21436

Address: 3701 CENTRAL

City: St. Petersburg State: FL Zip: 33711

Attn: Mike Pharm Fax#:

Project Name: WWTF Filter Proj#:

Sampler Name/Signature: [signature] Phone#:

	Sample Label (Client ID)	Collect Date	Collect Time	Matrix Code*	Sample Container No.	Sample Container Size	Parameters	Field Filtered (Y/N)	Integrity OK (Y/N)
1	WWT Filter	12/20	9:30	Sludge	3	3458	TCLP VOL AI: X; TCLP Semi VOL AI: X; TCLP RCRA8 AI: X; TCLP Pest AI; TCLP Herb AI; 1hr Fish Time RCRA-8: X		
2	ID 3242	12/20	9:30	Sludge	1	Baggie			
3									
4									
5									
6									
7									
8									
9									
10									

Matrix Codes*

SD	Solid Waste	OL	Oil
GW	Ground Water	SL	Sludge
EFF	Effluent	SO	Soil Sediment
AFW	Analyte Free H_2O	AQ	Aqueous
WW	Waste Water	NA	Nonaqueous
DW	Drinking Water	PE	Petroleum
SU	Surface Water	O	Other (Please Specify)

Pres/Codes

A. None	G. $Na_2S_2O_3$
B. HNO_3	H. $NaHSO_4$
C. H_2SO_4	I. ICE
D. NaOH	J. MCAA
E. HCL	O. Other
F. MeOH	

REMARKS

NO % Solids

ORIGINAL

Turnaround Time Requested	Date required	Short Hold?	QA/QC Report Level	COC OK	Initials	Specific State Certification Required
12/27/99	~~12/28~~ Jan 3	Y ____ N ✓	None ✓ 1 ____ 2 ____ 3 ____ Other ____	Y N	G.A.	

Coolers #'s	Item	Relinquished by	Date	Time	Received by	Date	Time
____ ____	01	[signature]	12/20/99	9:30	[signature]	12/20/99	9:30
____ ____	02	[signature]	12/20/99	17:00	[signature]	12/20/99	17:00
					[signature]	12/21/99	0945

Boilers: # ____

3231 N.W. 7th Avenue
Boca Raton, FL 33431
888-862-LABS
561-447-7373
888-456-4846 Fax
561-447-6136 Fax

C.O.C. #12830

STATE OF FLORIDA
DEPARTMENT OF ENVIRONMENTAL PROTECTION

CHAIN OF CUSTODY RECORD

Page 1 of 1

PROJECT NAME	SUBMITTING AGENCY NAME	SUBMITTING AGENCY CODE
Howco Environmental Services		

SAMPLER SIGNATURE(S)
Randall H. Strauss

RQ # RQ-2000-01-17-16

MODULE # 3060

~~Tampa Samples~~ → Tallahassee Samples

STATION/ LOCATION/ NUMBER	DATE M/D/Y	TIME ####	COMP/ GRAB	# Containers	TCLP-VOC	TCLP-BNA	TCLP-TR	TCLP-HG-H					Field ID #
WWT-119	1/19/2000	0955	Comp	3	X	X	X	X					25645
OES-119 Tank 110	1/19/2000	1045	Comp	3	X	X	X	X					25646
Trip Blank													25647

Tampa Samples				
Sealed and Relinquished by:	Date/ Time	Method of Dispatch:	Opened and Accepted by:	Date/ Time
Sealed and Relinquished by:	Date/ Time	Method of Dispatch:	Opened and Accepted by:	Date/ Time
Tallahassee Samples				
Sealed and Relinquished by: Randall H. Strauss	Date/ Time 1/19/2000 0445	Method of Dispatch: Hand-to-Hand.	~~Opened and~~ Accepted by:	Date/ Time 1/19/2000 0945
Sealed and Relinquished by:	Date/ Time 1/20/2000 0400	Method of Dispatch: FED EX	Opened and Accepted by:	Date / Time

Florida Department of Environmental Protection

Central Laboratory Sample Submittal Form

Event ID *

Request Number: RQ-2000-01-17-16

Howco Environmental Services

Customer: SW-DIST

Project ID: OTHER-WSM

PMAS:

Requester: Maria A Cantera

Collected By: Randall H. Strauss

Field Parameters Measured By:

Field Report Prepared By:

Send Final Report To:

Lab ID *	Location	Matrix (Include type e.g. Salt, Fresh, etc)	Temp (C)	pH	Latitude	Longitude	Comp / Grab	Collection (begin) Date / Time / Eastern Central	Collection (end) Date / Time / Eastern Central	Tot Res Chlorine (mg/L)	Diss Oxygen (mg/L)	Storet Station Number	Sample Depth m / ft	Salinity (PPTh) / Sp Conductance (umho/cm)	NPDES Number	Comments	Bottle Group(s) **
	WWT-119 Field ID 25645	Waste			° ' "	° ' "	☒ Comp ☐ Grab	1/19/2000 Time 0955 Eastern Central	1/19/2000 Time 0955 Eastern Central				☐ m ☐ ft	☐ Salinity (PPTh) ☐ Sp Conductance (umho/cm)			
	OES-119 Tank 110 Field ID 25646	Waste			° ' "	° ' "	☒ Comp ☐ Grab	1/19/2000 Time 1045 Eastern Central	1/19/2000 Time 1045 Eastern Central				☐ m ☐ ft	☐ Salinity (PPTh) ☐ Sp Conductance (umho/cm)			
	Location / Field ID	Matrix (Include type e.g. Salt, Fresh, etc)	Temp (C)	pH	Latitude	Longitude	☐ Comp ☐ Grab	Collection (begin) Date / Time / Eastern Central	Collection (end) Date / Time / Eastern Central	Tot Res Chlorine (mg/L)	Diss Oxygen (mg/L)	Storet Station Number	Sample Depth m / ft	Salinity (PPTh) / Sp Conductance (umho/cm)	NPDES Number	Comments	Bottle Group(s) **
	Location / Field ID	Matrix (Include type e.g. Salt, Fresh, etc)	Temp (C)	pH	Latitude	Longitude	☐ Comp ☐ Grab	Collection (begin) Date / Time / Eastern Central	Collection (end) Date / Time / Eastern Central	Tot Res Chlorine (mg/L)	Diss Oxygen (mg/L)	Storet Station Number	Sample Depth m / ft	Salinity (PPTh) / Sp Conductance (umho/cm)	NPDES Number	Comments	Bottle Group(s) **

Relinquished By:	Date/Time	Received By:	Date/Time	Relinquished By:	Date/Time	Received By:	Date/Time

* Shaded Areas for Lab use only.

** Please see reverse side for Bottle Group information.

last revised October 29,1999

Cooler Packing Worksheet For Request: RQ-2000-01-17-16
Howco Environmental Services
Ship Cooler On: 11-JAN-2000 Requester: Maria A Cantera

Customer/Project: SW-DIST/OTHER-WSM Priority 3

813-744-6100 SC 512-1042
FL Dept. of Environmental Protection
3804 Coconut Palm Drive
Tampa, FL 33619

Attn: Maria de la Cantera

Comments:
Splitting sample with Howco consultant.

Requested Analyses:

Group: A **# of Sites: 2**

Container ID: GJ-500ML Qty: 2 Preservation: ICE , Lot # 186826
Description: Glass Jar 500 mL

Analysis	Description
TCLP-BNA	TCLP for Semi-volatile organic pollutants by GC/MS.

Container ID: GJ-500ML Qty: 2 Preservation: ICE , Lot # 186826
Description: Glass Jar 500 mL

Analysis	Description
TCLP-HG-H	Mercury in TCLP samples using cold vapor AA spectroscopy.
TCLP-TR	Metals, total recoverable, in TCLP samples using trace-ICP emission spectroscopy.

Container ID: GJ-SEP-250 Qty: 4 Preservation: ICE , Lot # 300021
Description: 250 ml glass jar with a septa lid.

Analysis	Description
TCLP-VOC	Volatile organic pollutants in TCLP samples by GC/MS.

'Cooler Packed By: _____ Date: 1/18/00

DEP Cooler ID #(s): 56

Kit must also include:
- Field Sheets
- Temperature Control Bottle (1 per cooler)
- FedEx Bills, if applicable (1 per cooler)
- Plastic Bags

If Preservation Included:
ID _____ Lot # _____
ID _____ Lot # _____
ID _____ Lot # _____
ID _____ Lot # _____

Cooler received intact? (Circle one) Yes No Received By/Date: _____

PLEASE RETURN ALL COOLERS!

Date of Request: 11-JAN-2000
Created By: CANTERA_M on 11-JAN-2000 00:00
Modified By: CANTERA_M on 11-JAN-2000 00:00
Customer: SW-DIST
Project: OTHER-WSM
Division:
District: Southwest District
Sampling Event: Howco Environmental Services

Send Coolers To:

Phone: 813-744-6100 SC 512-1042
FL Dept. of Environmental Protection
3804 Coconut Palm Drive
Tampa, FL 33619
Attn: Maria de la Cantera

Send Final Report To:

FL Dept. of Environmental Protection
3804 Coconut Palm Drive
Tampa, FL 33619
Attn: Maria de la Cantera

Program Module Number:
Priority: 3
Request Status: P
Criminal Investigation: NO
Chemistry Request Reviewed By:
Biology Request Reviewed By:
Sampling Kit Required: YES Ship on: 11-JAN-2000
Sampling Kit Shipped:
Sampling Kit Packed By:
Date To Receive Samples: 17-JAN-2000
Received By:

Report Type: Final Only
FTP Data: NO
QC Report: YES
Date Log: NO
Authorisation Log: NO

Comment: Splitting sample with Howco consultant.

Suite A (Soil/Sediment/Waste) with 2 samples:

TCLP-BNA Template: DEFAULT EPA Method: EPA 625/ 8270 mod.. TCLP for Semi-volatile organic pollutants by GC/MS. -
- 1,4-Dichlorobenzene
- 2,4,5-Trichlorophenol
- 2,4,6-Trichlorophenol
- 2,4-Dinitrotoluene
- Endrin
- Hexachlorobenzene
- Hexachlorobutadiene
- Hexachloroethane
- Nitrobenzene
- Pentachlorophenol
- Pyridine
- gamma-BHC
- m,p-Cresols
- o-Cresol

TCLP-HG-H Template: DEFAULT EPA Method: EPA 245.1. Mercury in TCLP samples using cold vapor AA spectroscopy. -
- Mercury

TCLP-TR Template: DEFAULT EPA Method: EPA 6010 mod.. Metals, total recoverable, in TCLP samples using trace-ICP emi
- Arsenic
- Barium
- Cadmium
- Chromium
- Lead
- Selenium
- Silver

TCLP-VOC Template: DEFAULT EPA Method: EPA 8260. Volatile organic pollutants in TCLP samples by GC/MS. -
- 1,1,1-Trichloroethane
- 1,1,2,2-Tetrachloroethane
- 1,1,2-Trichloroethane
- 1,1-Dichloroethane

1,1-Dichloroethene
1,2-Dichlorobenzene
1,2-Dichloroethane
1,2-Dichloropropane
1,3-Dichlorobenzene
1,4-Dichlorobenzene
2-Butanone
4-Methyl-2-Pentanone
Acetone
Benzene
Bromoform
Carbon disulfide
Carbon tetrachloride
Chlorobenzene
Chloroform
Dibromochloromethane
Ethylbenzene
Methylene chloride
Tetrachloroethene
Toluene
Trichloroethene
Trichlorofluoromethane
Vinyl chloride
Xylenes (total)

CHEMISTRY LABORATORY ASSISTANCE REQUEST

REQUESTED BY / EXT.: Randy Strauss X387

ALTERNATIVE CONTACT: Beth Knauss X383

DATE OF REQUEST: ~~October 4, 1999~~ Jan 11, 2000 MODULE #:3060

PRIORITY: EMERGENCY URGENT ROUTINE/**ASAP**

NAME OF FACILITY/PROJECT: Howco Environmental Services

COUNTY: Pinellas **DATE OF ACTIVITY**: January 19, 2000

BACKGROUND INFORMATION: Taking a split sample with Howco's consultant who has sampling CompQAP. Consultant will provide sampling equipment, just need containers and lab time scheduled.

Two samples of waste sludge are to be taken and analyzed for all TCLP parameters, except pesticides. Sludge is likely to be of a consistency ranging from moist soil to 50% solids.

FOR CHEMISTRY USE

COMMENTS:

DATE COMPLETED:
EST. MAN HOURS:

V. W. DJORDJEVIC, Professional Engineer
Structural & Civil Engineering and Consulting to Industry and Public Works

December 8, 1999

Mr. Randall H. Strauss
Environmental Specialist II
Division of Waste Management
Department of Environmental Protection
Southwest District
3804 Coconut Palm Drive
Tampa, FL 33619

Dear Mr. Strauss:

Enclosed please find four (4) copies of the following documents pertaining to HOWCO Environmental Services, 843 43rd Street South, St. Petersburg, Florida:

1. Application Form for a Used Oil Processing Permit Part 2 - Certification for part of containment area #1 and entire containment area #2.
2. Drawing D-4-2 - Spill Containment Dikes Plan.
3. Application Form for a Used Oil Processing Permit Part 2 - Certification for containment area #5 and used oil containment storage area.
4. Drawing Titled Solids and Filter Processing and Truck Wash Rack Pad and Collector Channel.

These drawings and certifications have been issued on October 19, 1999 but you have found the certification language to be ambiguous and you have requested new certification. I hope that these certifications covering both areas will meet with your approval and will be accepted.

I want to take this opportunity to thank you for your cooperation, guidance and understanding. Should you, however, require any additional information, please address it directly to HOWCO Environmental Services, and we shall provide it promptly.

Sincerely yours,

V.W. Djordjevic, P.E.

CC: HOWCO Environmental Services

6733 First Avenue South, St. Petersburg, Florida 33707
Phone/Fax (727) 345-0080

DEP Form#	62-710.901(d)
Form Title	Used Oil Processing Facility Permit Application
Effective Date	December 23, 1996

APPLICATION FROM FOR A USED OIL PROCESSING PERMIT

PART II - CERTIFICATION

Form 62-710.901(d) P. E. Certification [Complete when required by Chapter 471, F.S. and Rules 62-4.050, 62-761,62-762, and 62-710, F.A.C.]

Use this form to certify to the Department of Environmental Protection for:

1. Certification of secondary containment adequacy (capacity), structural integrity (structural strength), and underground process piping for storage tanks, process tanks, and container storage.
X Certification of leak detection.
X Substantial construction modifications.
X Those elements of a closure plan requiring the expertise of an engineer.
X Tank design for new or additional tanks.
X Recertification of above items.

Please Print or Type

X Initial Certification _____ Recertification

1. DEP Facility ID Number: FLD 152-764-767 2. Tank Numbers: SEE TABLES 3.1, 3.2 & 3.3

3. Facility Name: HOWCO ENVIRONMENTAL SERVICES

4. Facility Address: 843 43rd STREET SOUTH, ST. PETERSBURG, FL 33711

This is to certify that containment area #5 and used oil container storage area have been upgraded and currently meet the requirements specified in 40 CFR 279.54(d). The containment for area #5 consists of concrete floor and concrete blocks retaining wall coated with an epoxy coating and used oil container storage area consists of concrete floor, concrete trenches and concrete block walls coated with an epoxy coating, which has rendered both areas sufficiently impervious to used oil to prevent any used oil released into the system from migrating out of the system to the soil, ground water or surface water.

Signature V.W. Djordjevic

V.W. Djordjevic P.E.
Name (please type)

Florida Registration Number: 41412

Mailing Address: 6733 1st Avenue South
Street or P. O. Box
St. Petersburg, FL 33707
City State Zip

Date: 12/8/99 Telephone (727) 345-0800

[PLEASE AFFIX SEAL]

V.W. DJORDJEVIC CERTIFICATE NO. 41412 STATE OF FLORIDA REGISTERED ENGINEER

V. W. Djordjevic
12-8-1999

DEP Form#	62-710.901(d)
Form Title	Used Oil Processing Facility Permit Application
Effective Date	December 23, 1996

APPLICATION FROM FOR A USED OIL PROCESSING PERMIT

PART II - CERTIFICATION

Form 62-710.901(d) P. E. Certification [Complete when required by Chapter 471, F.S. and Rules 62-4.050, 62-761,62-762, and 62-710, F.A.C.]

Use this form to certify to the Department of Environmental Protection for:

1. Certification of secondary containment adequacy (capacity), structural integrity (structural strength), and ~~underground process piping for storage tanks~~, process tanks, and container storage.
X. Certification of leak detection.
X. Substantial construction modifications.
X. Those elements of a closure plan requiring the expertise of an engineer.
X. Tank design for new or additional tanks.
X. Recertification of above items.

Please Print or Type

_____X_____ Initial Certification _____ Recertification

1. DEP Facility ID Number: FLD 152-764-767 2. Tank Numbers: SEE TABLES 3.1, 3.2 & 3.3

3. Facility Name: HOWCO ENVIRONMENTAL SERVICES

4. Facility Address: 843 43rd STREET SOUTH, ST. PETERSBURG, FL 33711

This is to certify that part of containment area #1 containing tanks 100, 101 and flash tower and entire containment area #2 have been upgraded and currently meet the requirements specified in 40 CFR 279.54(d). The containment consists of concrete floors and concrete retaining walls coated with an epoxy coating which has rendered the containment sufficiently impervious to used oil to prevent any used oil released into the system from migrating out of the system to the soil, ground water or surface water.

V. W. Djordjevic
Signature

V.W. Djordjevic P.E.
Name (please type)

Florida Registration Number: 41412

Mailing Address: 6733 1st Avenue South
Street or P. O. Box

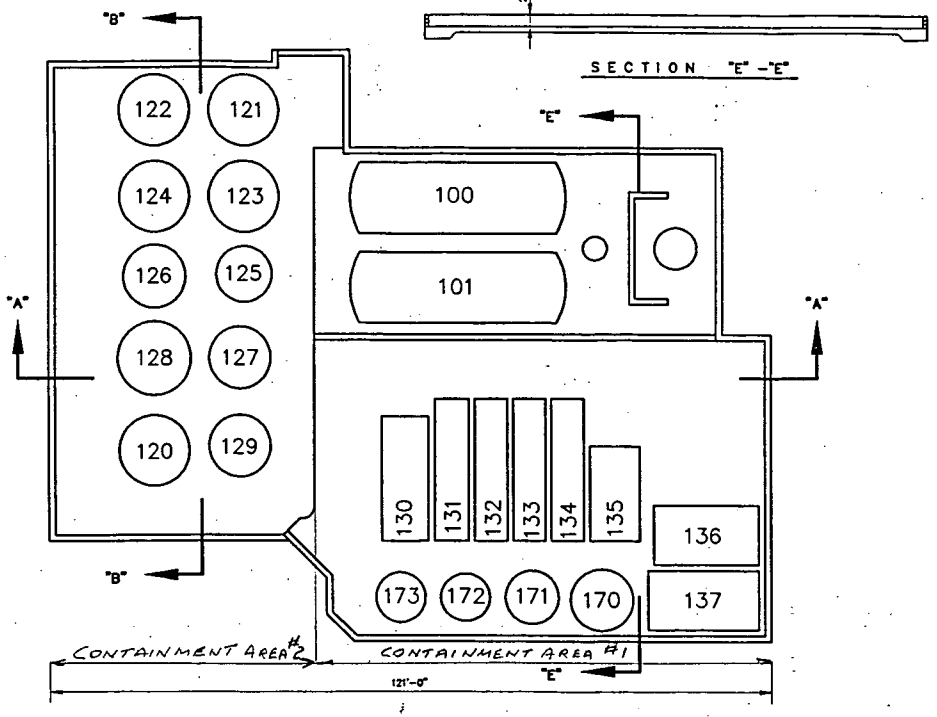
St. Petersburg, FL 33707
City State Zip

Date: 12/8/99 Telephone (727) 345-0800

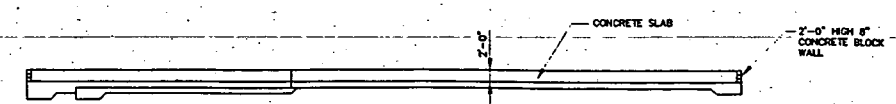
[PLEASE AFFIX SEAL]

V. W. DJORDJEVIC CERTIFICATE NO. 41412 STATE OF FLORIDA REGISTERED ENGINEER

V. W. Djordjevic
12-8-1999



OIL PROCESSING PLANT



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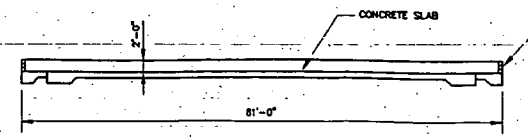

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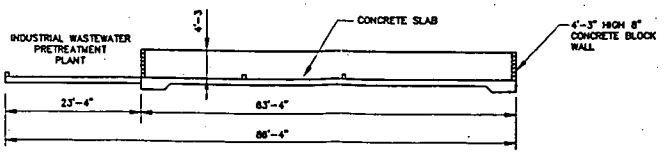

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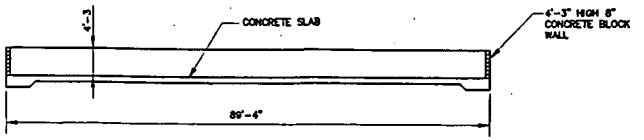

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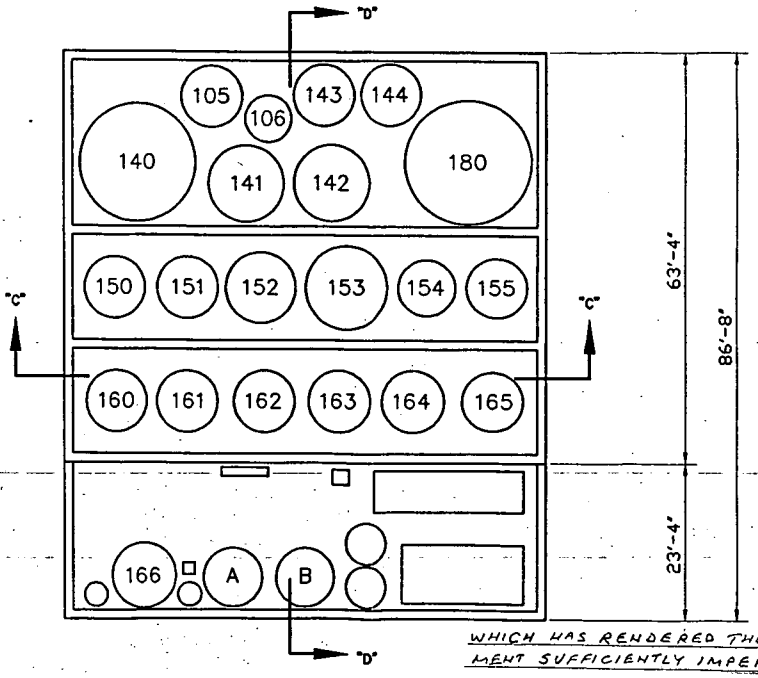

INDUSTRIAL WASTEWATER PRETREATMENT PLANT

NOTES

1-PART OF CONTAINMENT AREA #1 CONTAINING TANKS 100, 101 AND FLASH TOWER AND ENTIRE CONTAINMENT AREA #2 HAVE BEEN UPGRADED AND CURRENTLY MEET THE REQUIREMENTS SPECIFIED IN 40CFR 279.54(d)

2-THE CONTAINMENT CONSISTS OF CONCRETE FLOORS AND CONCRETE RETAINING WALLS COATED WITH AN EPOXY COATING WHICH HAS RENDERED THE CONTAINMENT SUFFICIENTLY IMPERVIOUS TO USED OIL TO PREVENT ANY USED OIL RELEASED INTO THE SYSTEM FROM MIGRATING OUT OF THE SYSTEM TO THE SOIL, GROUNDWATER OR SURFACE WATER

V.W. DJORDJEVIC CERTIFICATE STATE OF FLORIDA REG. ENGR.

V.W. Djordjevic
12-8-1999

VLASTIMIR W. DJORDJEVIC PROF. ENGR. 6733 1ST AVE. SOUTH-ST. PETERSBURG, FL. 33707	
SCALE: DATE: DEC. 29, 1998	PROJECT — DRAWN: G.C.R.
HOWCO ENVIRONMENTAL SERVICES 843 43RD ST. SOUTH – ST. PERERSBURG FL.	
SPILL CONTAINMENT DIKES PLAN	D-4-2

```
AREA: SWD_______        Cash Receiving Application                    CRAF006A
                  Collection Point Log Remittance      Tot: ______$1,762.50
+-------------------------------------------------------------------------+
| SYS$REMT: 368641__ Type: CP___    Recved Date: 27-DEC-1999  Status: RECEIVED |
| SYS$RCPT: 305095__ PNR: _______ Check #: 033198____  Amount: _____1,762.50 |
| SSN/FEI#: _________              Name: HOWCO_ENVIRONMENTAL_SERVICES__      |
|   First: _____________ Middle: _____ Title:_______ Suf: _____             |
| Address1: 3701_CENTRAL_AVENUE_____________________ Short Comments:        |
| Address2: _____________________________________ D-WASTE/OGC_97-2190_____   |
|    City: ST._PETERSBURG_____ ST: FL  Zip: 33713-____ Country: _________   |
+-------------------------------------------------------------------------+
+-------------------------> P A Y M E N T (S) <-----------------------------+
|          Distr                                                        S    |
|          CL     Object                    Payment                Applic/  T  |
| SYS$PAYT Area.. Code/Description.....: Amount..... Reference#      Fund  A  |
| 386861__ SWD___ 012008 LCT-PENALTIES__ _____$1,762.50 OGC97-2190 ___ ECOSYS CO |
| _______ ______ ______ _____________ _____________ _____________ ___ ______ __ |
| _______ ______ ______ _____________ _____________ _____________ ___ ______ __ |
| _______ ______ ______ _____________ _____________ _____________ ___ ______ __ |
| _______ ______ ______ _____________ _____________ _____________ ___ ______ __ |
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 COMMIT FREQUENTLY                  ______$1,762.50  Payment total
Enter_short_comment._____________________________________________________
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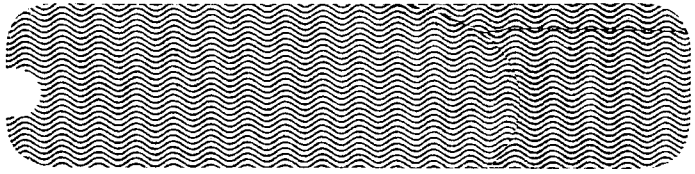

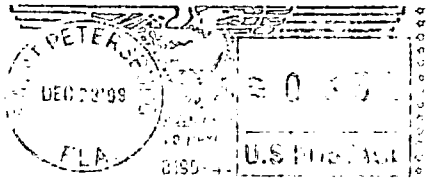

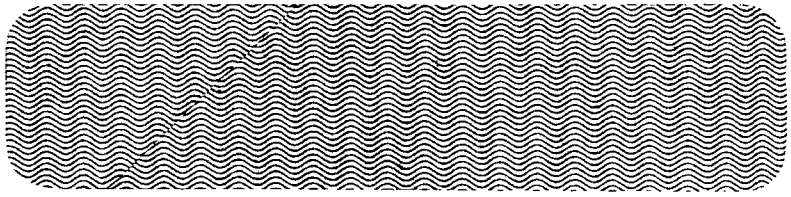

33613-1352 71

DEP Form#	62-710.901(d)
Form Title	Used Oil Processing Facility Permit Application
Effective Date	December 23, 1996

APPLICATION FROM FOR A USED OIL PROCESSING PERMIT

PART II - CERTIFICATION

Form 62-710.901(d) P. E. Certification [Complete when required by Chapter 471, F.S. and Rules 62-4.050, 62-761,62-762, and 62-710, F.A.C.]

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X Those elements of a closure plan requiring the expertise of an engineer.
X Tank design for new or additional tanks.
X Recertification of above items.

Please Print or Type

X Initial Certification _____ Recertification

1. DEP Facility ID Number: FLD 152-764-767 2. Tank Numbers: SEE TABLES 3.1, 3.2 & 3.3

3. Facility Name: HOWCO ENVIRONMENTAL SERVICES

4. Facility Address: 843 43rd STREET SOUTH, ST. PETERSBURG, FL 33711

This is to certify that containment area #5 and used oil container storage area have been upgraded and currently meet the requirements specified in 40 CFR 279.54(d). The containment for area #5 consists of concrete floor and concrete blocks retaining wall coated with an epoxy coating and used oil container storage area consists of concrete floor, concrete trenches and concrete block walls coated with an apoxy coating, which has rendered both areas sufficiently impervious to used oil to prevent any used oil released into the system from migrating out of the system to the soil, ground water or surface water.

Signature V.W. Djordjevic

V.W. Djordjevic P.E.
Name (please type)

Florida Registration Number: 41412

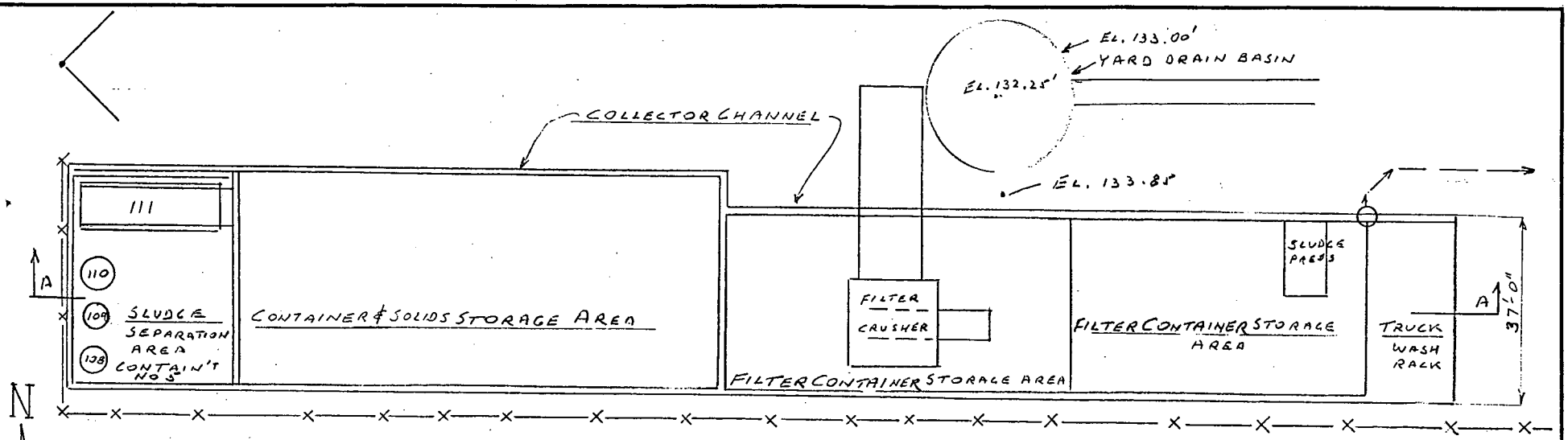
Mailing Address: 6733 1st Avenue South
Street or P. O. Box
St. Petersburg, FL 33707
City State Zip

Date: 12/8/99 Telephone (727) 345-0800

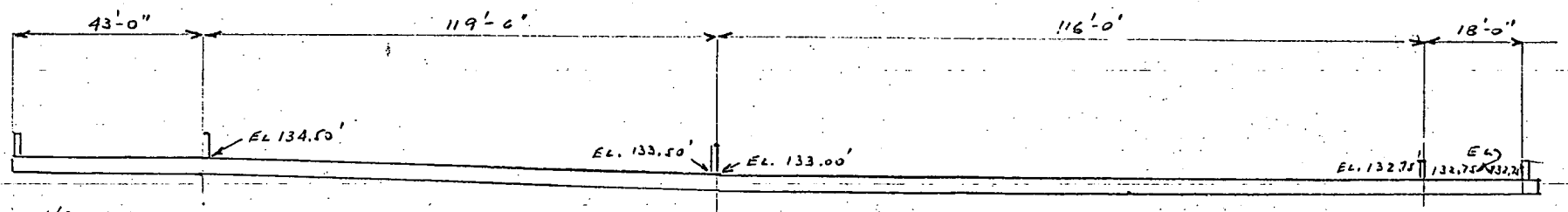
[PLEASE AFFIX SEAL]

V. W. DJORDJEVIC CERTIFICATE NO. 41412 STATE OF FLORIDA REGISTERED ENGINEER

V. W. Djordjevic
12-8-1999



SLUDGE & FILTER PROCESSING AND TRUCK WASH RACK PAD AND COLLECTOR CHANNEL PLAN



SECTION A-A

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V. W. DJORDJEVIC CERTIFICATE NO. 19482 STATE OF FLORIDA REGISTERED ENGINEER

V. W. Djordjevic
12-8-1999

VLASTIMIR W. DJORDJEVIC PROF. ENGR.
6733 1ST. AVE. SOUTH - ST. PETERSBURG, FL. 33707

SCALE: NTS.	APPROVED BY: PROJECT No.	DRAWN BY V.W. DJ.
DATE: 9-15-1999		REVISED

HOWCO ENVIRONMENTAL SERVICES LTD.
843 43ED ST. SOUTH - ST. PETERSBURG, FL.

SOLIDS & FILTER PROCESSING AND TRUCK WASH RACK PAD AND COLLECTOR CHANNEL

DRAWING NUMBER

DEP Form#	62-710.901(d)
Form Title	Used Oil Processing Facility Permit Application
Effective Date	December 23, 1996

APPLICATION FROM FOR A USED OIL PROCESSING PERMIT

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Signature V.W. Djordjevic

V.W. Djordjevic P.E.
Name (please type)

Florida Registration Number: 41412

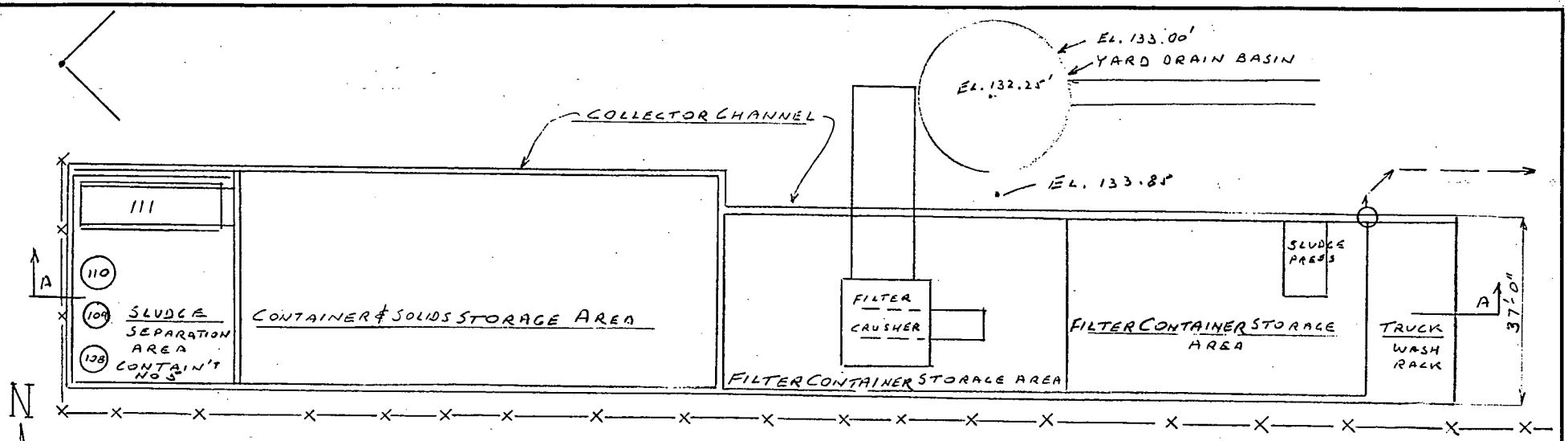
Mailing Address: 6733 1st Avenue South
Street or P. O. Box
St. Petersburg, FL 33707
City State Zip

Date: 12/8/99 Telephone (727) 345-0800

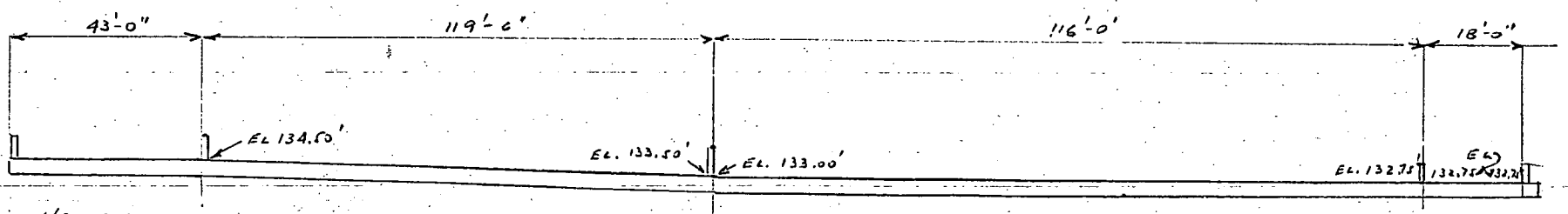
[PLEASE AFFIX SEAL]

V. W. DJORDJEVIC
CERTIFICATE NO. 41412
STATE OF FLORIDA
REGISTERED ENGINEER

V. W. Djordjevic
12-8-1999



SLUDGE & FILTER PROCESSING AND TRUCK WASH RACK PAD AND COLLECTOR CHANNEL PLAN



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V. W. DJORDJEVIC CERTIFICATE NO. 24412 STATE OF FLORIDA REGISTERED ENGINEER

V. W. Djordjevic 11-8-1999

VLASTIMIR W. DJORDJEVIC PROF. ENGR.
6733 1ST. AVE. SOUTH – ST. PETERSBURG, FL. 33707

SCALE: NTS.	APPROVED BY: PROJECT No.	DRAWN BY V.W. DJ.
DATE: 9-15-1999		REVISED

HOWCO ENVIRONMENTAL SERVICES LTD.
843 43RD ST. SOUTH – ST. PETERSBURG, FL.

SOLIDS & FILTER PROCESSING AND TRUCK WASH RACK PAD AND COLLECTOR CHANNEL

DRAWING NUMBER

DEP Form#	62-710.901(d)
Form Title	Used Oil Processing Facility Permit Application
Effective Date	December 23, 1996

APPLICATION FROM FOR A USED OIL PROCESSING PERMIT

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Please Print or Type

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V. W. Djordjevic
Signature

V.W. Djordjevic P.E.
Name (please type)

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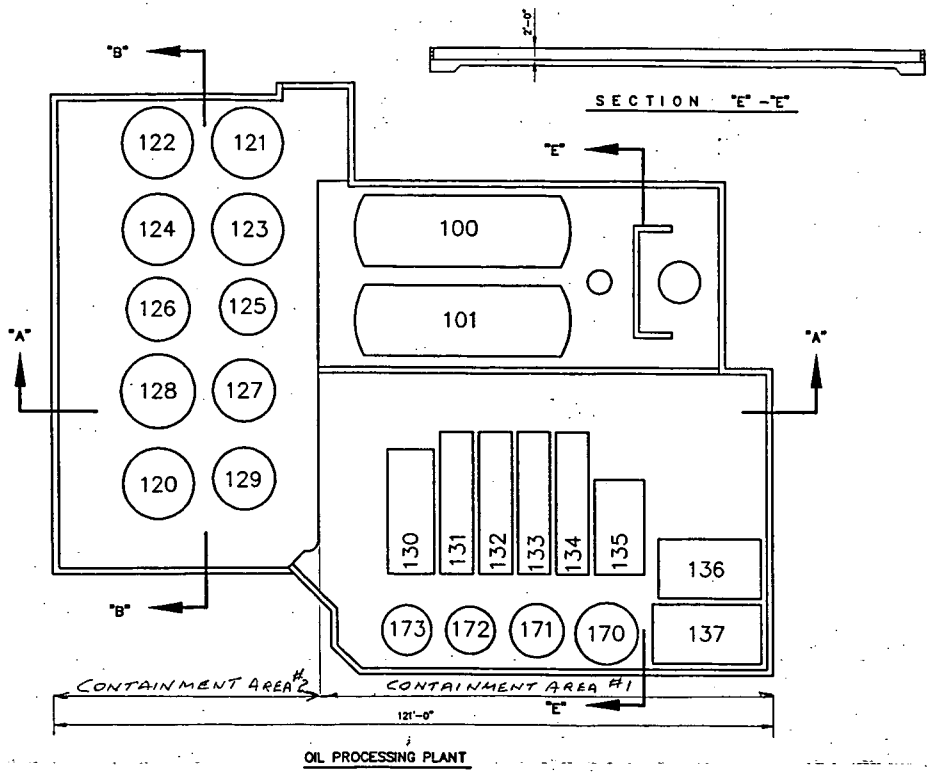
Date: 12/8/99 Telephone (727) 345-0800

[PLEASE AFFIX SEAL]

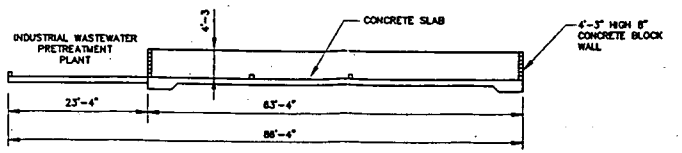
DJORDJEVIC
CERTIFICATE NO. 41412
STATE OF FLORIDA
REGISTERED ENGINEER

V. W. Djordjevic
12-8-1999



OIL PROCESSING PLANT

SECTION "E" -"E"



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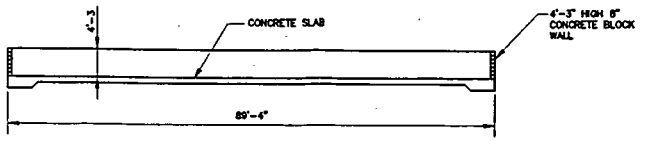

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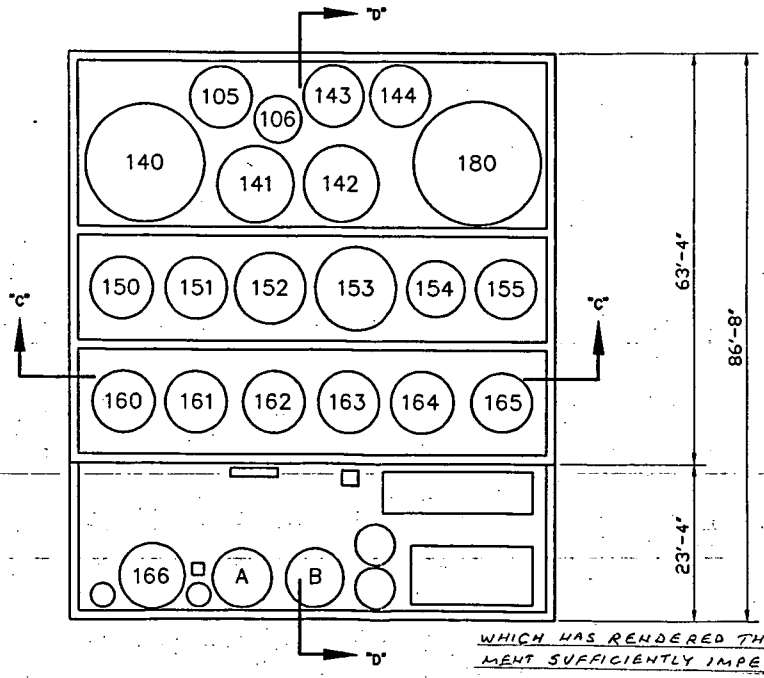
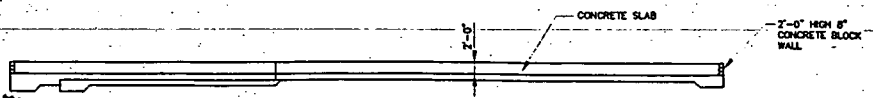


INDUSTRIAL WASTEWATER PRETREATMENT PLANT



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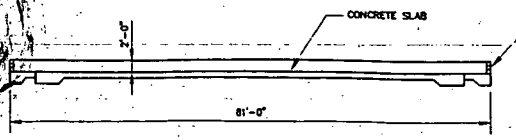

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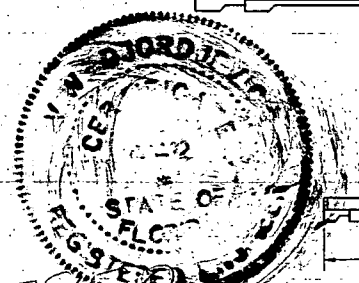

V. W. Djordjevic
12-8-1999

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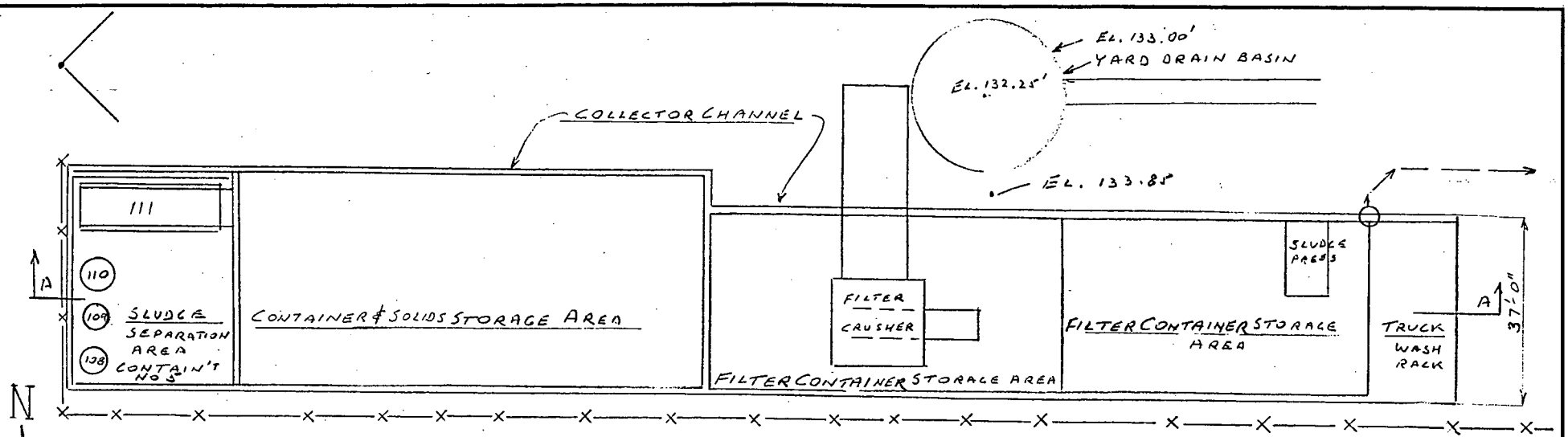
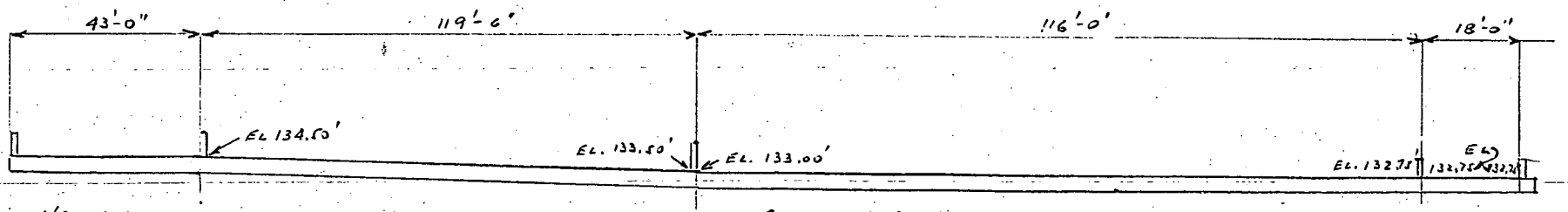
VLASTIMIR W. DJORDJEVIC PROF. ENGR. 8733 1ST AVE. SOUTH-ST. PETERSBURG, FL 33707	
SCALE: DATE: DEC. 29, 1998	PROJECT — DRAWN: G.C.R.
HOWCO ENVIRONMENTAL SERVICES 843 43RD ST. SOUTH - ST. PERERSBURG FL.	
SPILL CONTAINMENT DIKES PLAN	D-4-2



SLUDGE & FILTER PROCESSING AND TRUCK WASH RACK PAD AND COLLECTOR CHANNEL PLAN



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CERTIFICATE NO. 24472 STATE OF FLORIDA REGISTERED ENGINEER

V. W. Djordjevic
12-8-1999

VLASTIMIR W. DJORDJEVIC PROF. ENGR.
6733 1ST. AVE. SOUTH – ST. PETERSBURG, FL. 33707

SCALE: NTS.	APPROVED BY: PROJECT No.	DRAWN BY V.W. DJ.
DATE: 9-15-1999		REVISED

HOWCO ENVIRONMENTAL SERVICES LTD.
843 43ED ST. SOUTH – ST. PETERSBURG, FL.

SOLIDS & FILTER PROCESSING AND TRUCK WASH RACK PAD AND COLLECTOR CHANNEL

DRAWING NUMBER

DEP Form#	62-710.901(d)
Form Title	Used Oil Processing Facility Permit Application
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V. W. Djordjevic
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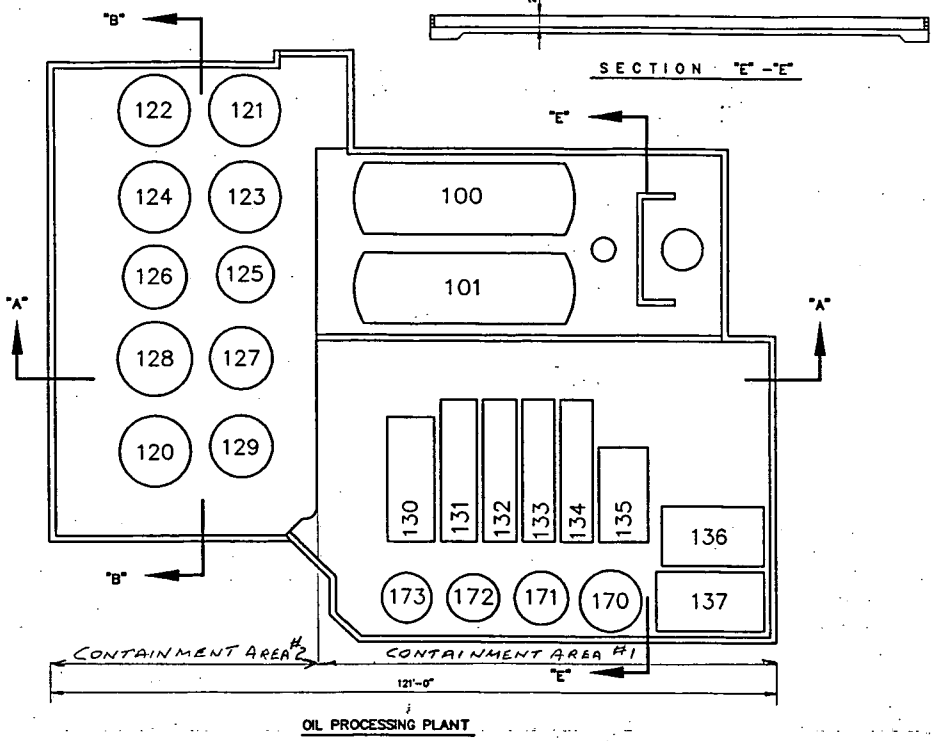
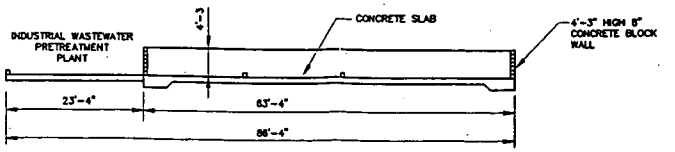


OIL PROCESSING PLANT

SECTION "E" -"E"



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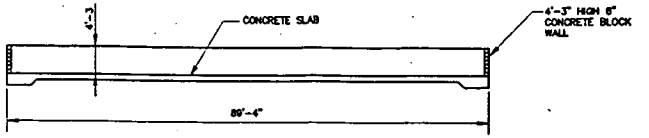

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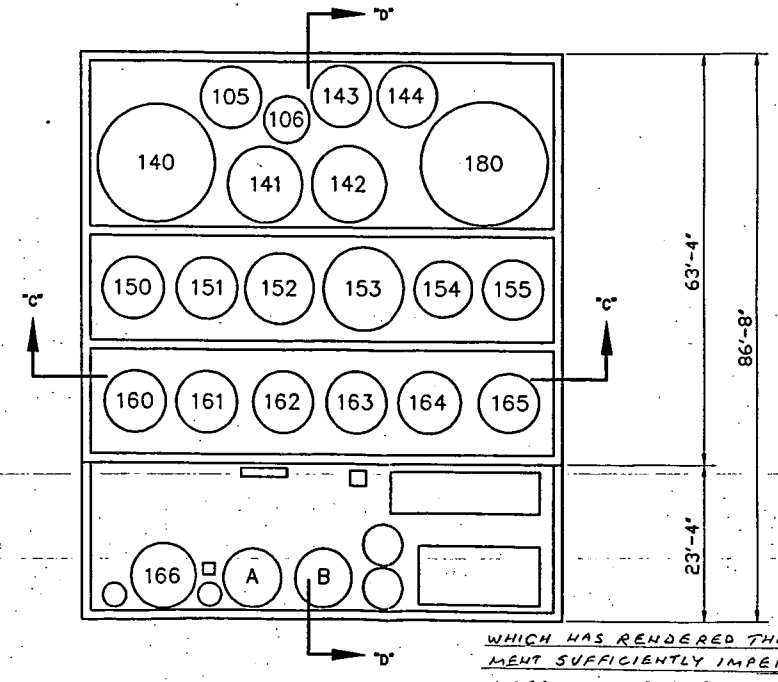

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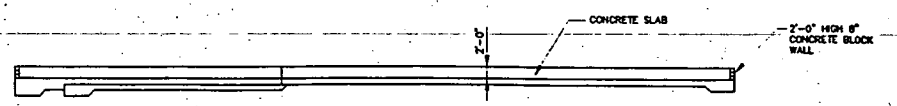

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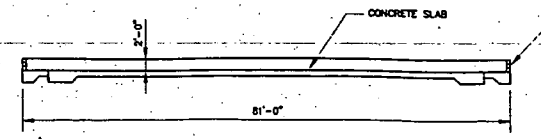

SECTION "B" -"B"

V. W. Djordjevic
12-8-1999

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VLASTIMIR W. DJORDJEVIC PROF. ENGR.
6733 1ST AVE. SOUTH-ST. PETERSBURG, FL 33707

SCALE:
DATE: DEC. 29, 1998
PROJECT
DRAWN: G.C.R.

HOWCO ENVIRONMENTAL SERVICES
843 43RD ST. SOUTH - ST. PERERSBURG FL.

SPILL CONTAINMENT DIKES PLAN
D-4-2

Department of Environmental Protection

Jeb Bush
Governor

Southwest District
3804 Coconut Palm Drive
Tampa, Florida 33619

David B. Struhs
Secretary

December 6, 1999

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

Re: Howco Environmental Services EPA ID# FLD 152 764 767
843 43rd Street South
St. Petersburg, FL
OGC Case No.: 97-2190

Dear Mr. Hagan:

Enclosed are the results of the Department's TCLP analysis of your wastewater treatment and oil extracted sludge (OES). The samples were taken as splits with your consultant on October 11, 1999, during the second required sampling event per the terms of the Consent Order in the above referenced case. The OES sample did not exceed any of the regulatory levels and can be managed as non-hazardous solid waste. The wastewater sludge sample exceeded the regulatory level for benzene by TCLP analysis, and therefore must be managed as a hazardous waste. Dave Roehm previously informed me that U.S. Biosystems' analysis of the wastewater sludge sample taken on October 11, also showed an exceedance for benzene. As required by the Consent Order, you must obtain two consecutive analyses of this waste stream that show it is non-hazardous, before resuming management of this waste as non-hazardous based on generator knowledge alone with no further analysis. Accordingly, I understand from Dave that you have had U.S. Biosystems sample two additional batches of wastewater treatment sludge on November 22 and 30 for TCLP analysis. The sludge from these batches, and all additional wastewater treatment sludge generated prior to receiving the analysis results of these samples, must be containerized and held on-site pending receipt of the results. This waste must be managed as hazardous until and unless TCLP analyses of two consecutive batches indicate it is non-hazardous.

Please submit copies of the manifest for shipment of the hazardous sludge and the results of the additional analyses as soon as you receive them. If you have any questions, please call me at (813)744-6100, extension 387.

Sincerely,

Randall H. Strauss
Environmental Specialist II
Division of Waste Management

Enclosure

FLORIDA DE. RTMENT OF ENVIRONMENTAL PROTECTION

3804 Coc ut Palm Drive
Tampa, FL 33619-8318

FAX

Date: December 3, 1999

Number of pages including cover sheet: 3

To:
Tim Hagan
Howco Environmental

Phone:

Fax phone: 727 321-6213

CC:

From:
Randy Strauss
HW Section

Phone: (813) 744-6100 x387

Fax phone: (813) 744-6125

REMARKS: ☐ Urgent ☑ For your review ☐ Reply ASAP ☐ Please comment

Tim — I have modified the form so that the specifics of what is being certified can be inserted after "This is to certify that..."

The general language is not applicable because it is basically certifying that the entire site meets all standards — which as we know is not the case, yet.

Also enclosed is the only piece of paper I have received regarding certification.

Randy

To:
Tim Hagan
Howco Environmental

Phone:
Fax phone: 727 321-6213
CC:

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Randy Strauss
HW Section

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Fax phone: (813) 744-6125

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Randy

Telephone Number	Mode	Start	Pages	Time	Result	Note
8172732162l3	NORMAL	3,16:37	3	0'58"	* O K	

Dec 3 1999 16:38

** Transmit Conf. Report **

WASTE MGT TAMPA SWD Fax:8137446125

DEP Form#	62-710.901(d)
Form Title	Used Oil Processing Facility Permit Application
Effective Date	December 23, 1996

APPLICATION FROM FOR A USED OIL PROCESSING PERMIT

PART II - CERTIFICATION

Form 62-710.901(d) P. E. Certification [Complete when required by Chapter 471, F.S. and Rules 62-4.050, 62-761,62-762, and 62-710, F.A.C.]

Use this form to certify to the Department of Environmental Protection for:

1. Certification of secondary containment adequacy (capacity), structural integrity (structural strength), and underground process piping for storage tanks, process tanks, and container storage.
2. Certification of leak detection.
3. Substantial construction modifications.
4. Those elements of a closure plan requiring the expertise of an engineer.
5. Tank design for new or additional tanks.
6. Recertification of above items.

Please Print or Type

_____ Initial Certification _____ Recertification

1. DEP Facility ID Number: _____ 2. Tank Numbers: _____

3. Facility Name: _____

4. Facility Address: _____

This is to certify that

_____
Signature

_____
Name (please type)

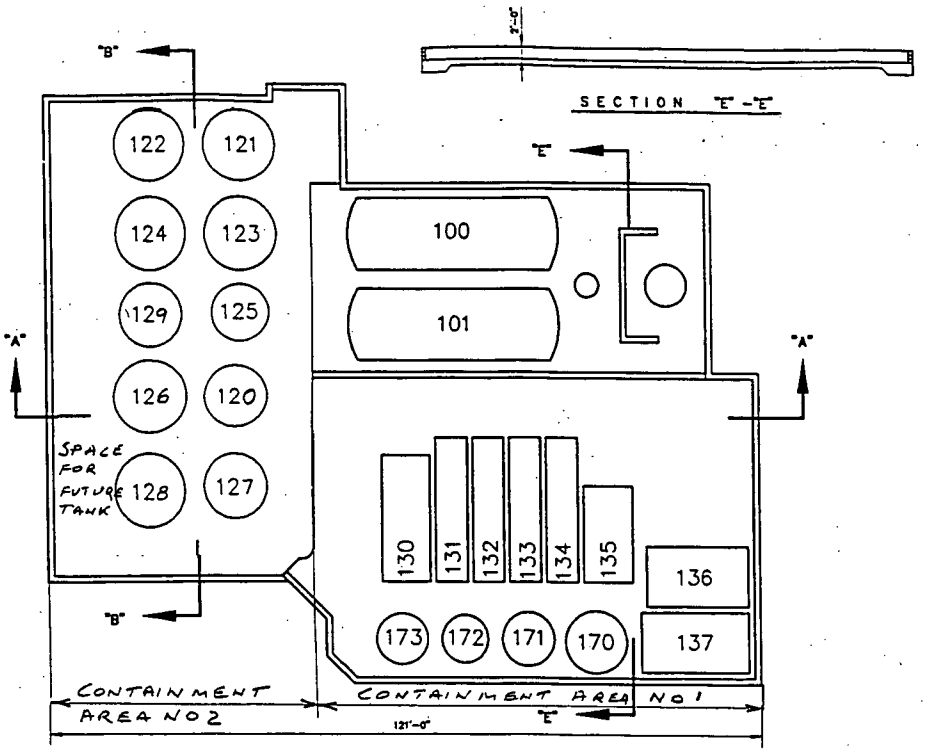
Florida Registration Number: _____

Mailing Address: _____
Street or P. O. Box

_____
City State Zip

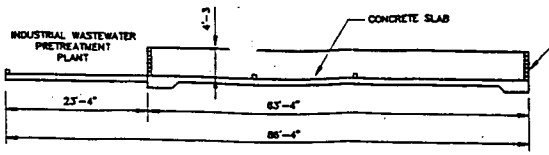
Date: _____ Telephone ( ) _____

[PLEASE AFFIX SEAL]



OIL-PROCESSING PLANT

SECTION "E" -"E"



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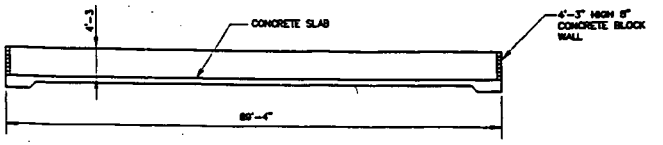

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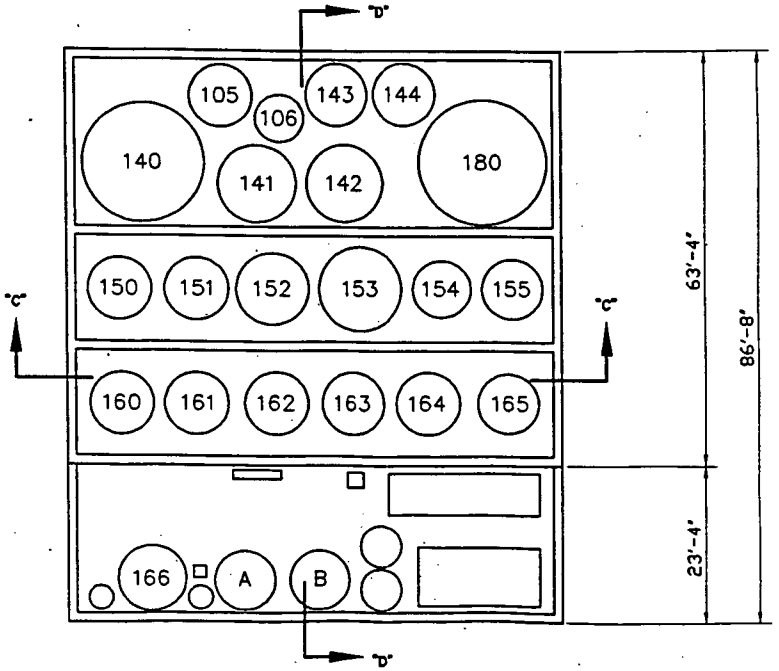
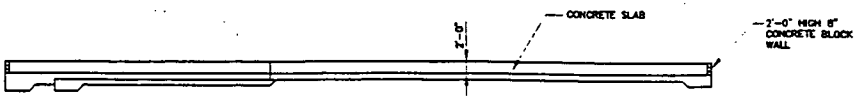


INDUSTRIAL WASTEWATER PRETREATMENT PLANT



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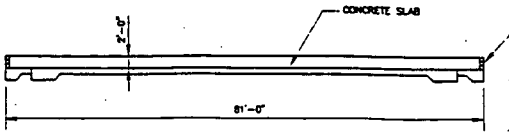


SECTION "B" -"B"

NOTE!
PART OF CONTAINMENT AREA NO 1 CONTAINING TANKS 100, 101 AND FLASH TOWER AND ENTIRE CONTAINMENT AREA NO 2 CONSIST OF CONCRETE FLOOR AND CONCRETE RETAINING WALLS & GENERAL POLYMERS EPONY COATING ARE SUFFICIENTLY IMPERVIOUS TO USED OIL

V. W. Djordjevic 9-20-1999

VLASTIMIR W. DJORDJEVIC PROF. ENGR.
6733 1ST AVE. SOUTH-ST. PETERSBURG, FL 33707

SCALE:
DATE: DEC. 29, 1998
PROJECT
DRAWN: G.C.R.

HOWCO ENVIRONMENTAL SERVICES
843 43RD ST. SOUTH – ST. PERERSBURG FL

SPILL CONTAINMENT DIKES PLAN D-4-2

Department of
Environmental Protection

Jeb Bush
Governor

Southwest District
3804 Coconut Palm Drive
Tampa, Florida 33619

David B. Struhs
Secretary

November 30, 1999

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

Re: Howco Environmental Services
843 43rd St. S.
St. Petersburg, FL
OGC Case No.: 97-2190

Dear Mr. Hagan:

As required by paragraph 10.b.(6) of the Consent Order in the referenced case, the Department has not received from Howco the Professional Engineer (P.E.) certifications for the following upgrades required to have been completed to date, per the due dates specified in the Order:

Upgrade/CO paragraph	Upgrade Completion Due Date	PE Certification Due Date	Days out-of-compliance
Tank #110/#111 2nd containment/10.b.(3)	August 15, 1999	September 14, 1999	77 days
Used oil container storage area/10.b.(1)	October 14, 1999	November 13, 1999	17 days

If the above upgrades have been completed and can be certified, please submit the certifications including the specified forms, as required by paragraph 10.b.(6). If the upgrades have not been completed, please provide a detailed status report and estimated completion dates.

Per paragraph 12 of the Consent Order, Howco has agreed to pay stipulated penalties of $100.00 for each violation for each and every day you fail to timely comply with any of the requirements of the Order. Each failure to submit the required certifications constitutes a separate violation of the Order. The two violations listed in the above table currently total 94 days out of compliance. Per paragraph 12 of the Order, this letter constitutes written demand by the Department of Howco to submit payment of the stipulated penalties owed to date, which total $9400.00.

The Department has received the drawing with the P.E. certification statement that Containment Area #2 "consist(s) of concrete floor and concrete retaining wall & general polymers epoxy coating are sufficiently impervious to used oil". This statement is ambiguous and unclear. The certifications must include the form specified in paragraph 10.b.(6) and must explicitly state that the upgrades meet the applicable standards specified in the Order. For example: "Containment Area #2 has been upgraded and currently meets the requirements specified in 40 CFR 279.54(d). The containment consists of a concrete floor and concrete retaining walls that have been coated with an epoxy coating, which has rendered the containment sufficiently impervious to used oil to prevent any used oil released into the system from migrating out of the system to the soil, groundwater or surface water." Please submit this certification with the required form and ensure that all future submittals are clear, unambiguous and include all the required items.

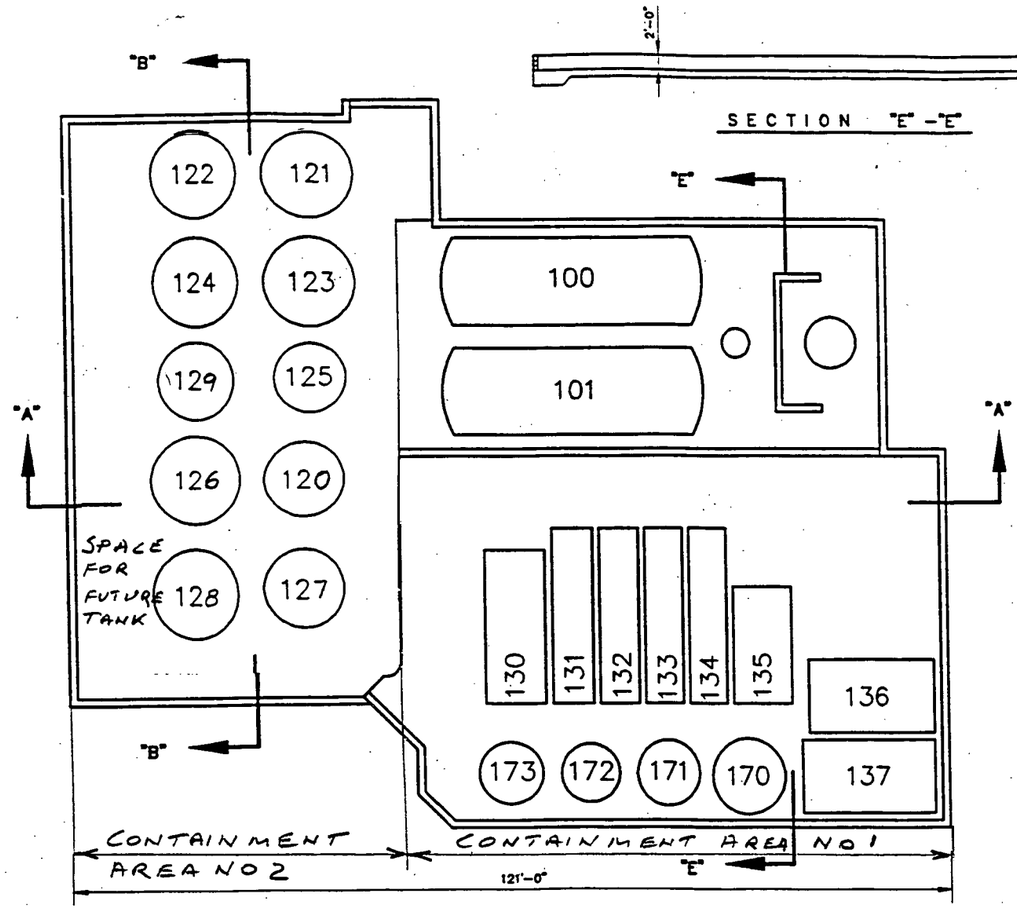
November 30, 1999

Upon timely submittal of these items including the $9400.00 stipulated penalty incurred to date, the Department will consider waiving payment of the stipulated penalties that continue to accrue. If you have any questions, please call me at (813)744-6100, extension 387.

Sincerely,

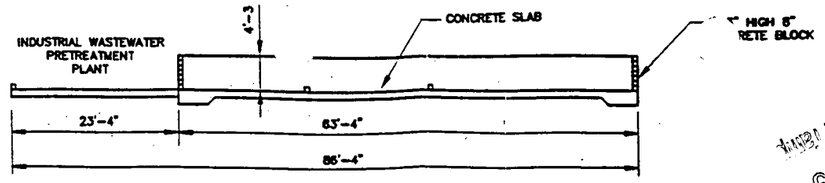
Randall H. Strauss
Environmental Specialist II
Division of Waste Management

cc: Agusta Posner, OGC
Laurel Lockett, Carlton Fields



OIL PROCESSING PLANT

SECTION "E" -"E"



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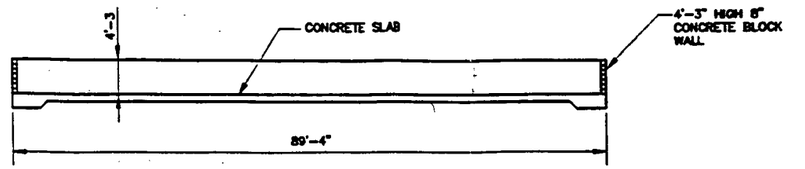
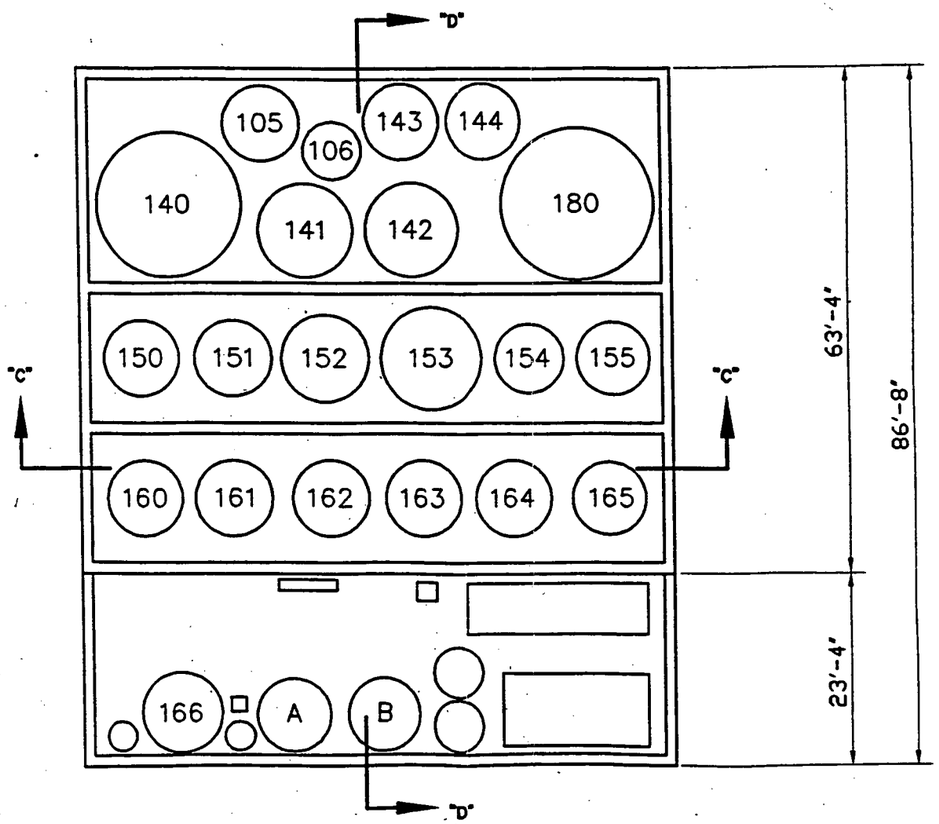


SECTION "C" -"C"

SECTION "A" -"A"

SECTION "B" -"B"



INDUSTRIAL WASTEWATER PRETREATMENT PLANT

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V. W. DJORDJEVIC CERTIFICATE NO. 17412 STATE OF FLORIDA REGISTERED ENGINEER

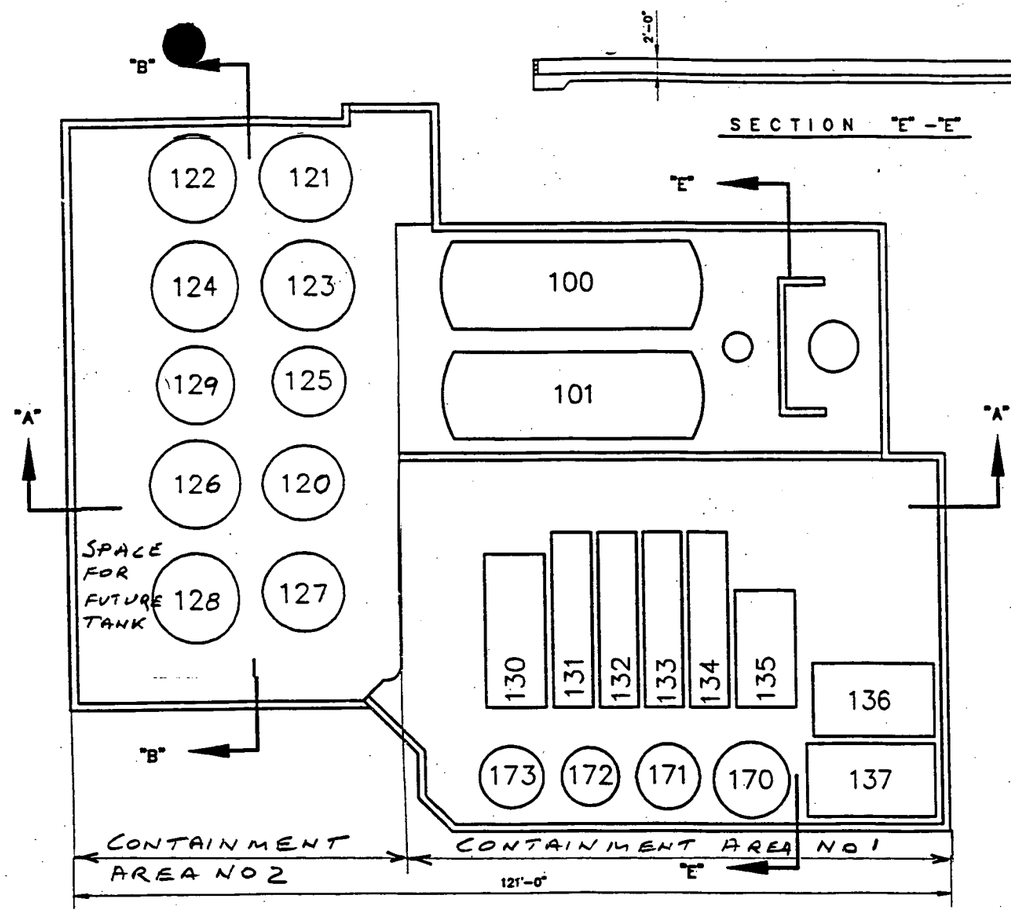
V. W. Djordjevic 9-20-1999

VLASTIMIR W. DJORDJEVIC PROF. ENGR.
6733 1ST AVE. SOUTH-ST. PETERSBURG, FL. 33707

SCALE:	PROJECT	DRAWN: G.C.R.
DATE: DEC. 29, 1998		

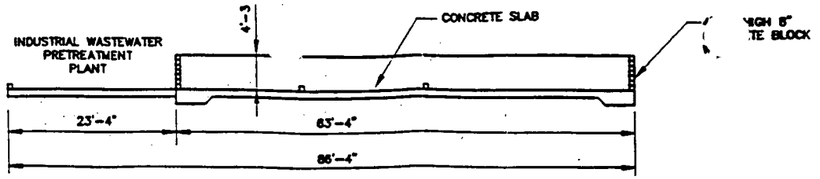
HOWCO ENVIRONMENTAL SERVICES
843 43RD ST. SOUTH – ST. PERERSBURG FL.

SPILL CONTAINMENT DIKES PLAN — D-4-2



SECTION "E" -"E"

OIL PROCESSING PLANT



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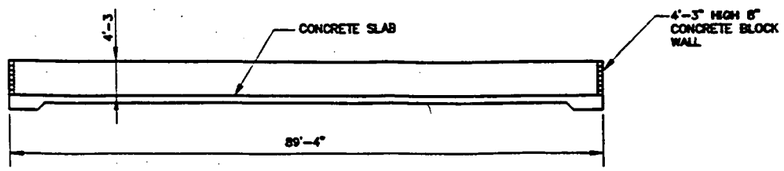

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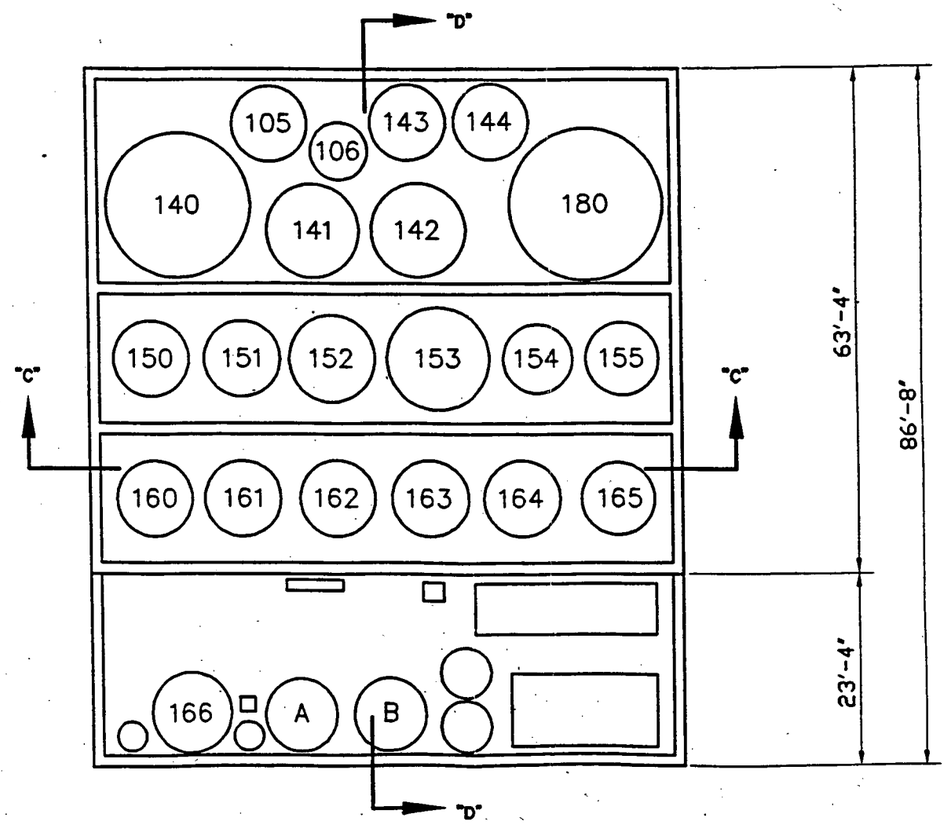

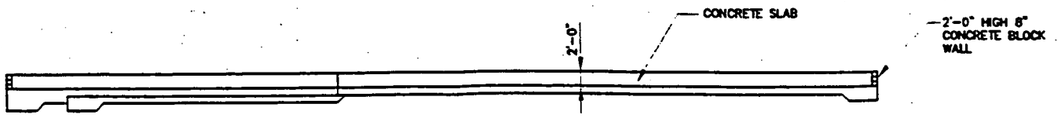

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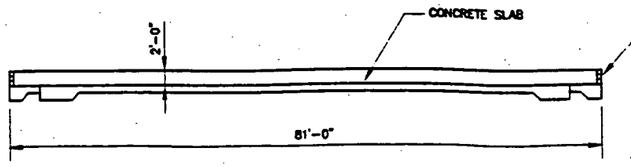

SECTION "B" -"B"

INDUSTRIAL WASTEWATER PRETREATMENT PLANT

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V. W. DJORDJEVIC CERTIFICATE NO. 47412 STATE OF FLORIDA REGISTERED ENGINEER

V. W. Djordjevic 9-20-1999

D.E.P. NOV 18 1999 District Tampa

VLASTIMIR W. DJORDJEVIC PROF. ENGR. 6733 1ST AVE. SOUTH-ST. PETERSBURG, FL 33707	
SCALE: DATE: DEC. 29, 1998	PROJECT — DRAWN: G.C.R.
HOWCO ENVIRONMENTAL SERVICES 843 43RD ST. SOUTH – ST. PERERSBURG FL	
SPILL CONTAINMENT DIKES PLAN	D-4-2

AREA: SWD_____ Cash Receiving Application CRAF006A
Collection Point Log Remittance Tot: _____$1,762.50

SYS$REMT: 365981__ Type: CP___ Recved Date: 29-NOV-1999 Status: RECEIVED
SYS$RCPT: 302616__ PNR: _____ Check #: 033038____ Amount: _____1,762.50
SSN/FEI#: _____ Name: HOWCO_ENVIRONMENTAL_SERVICES__
First: _____ Middle: _____ Title:_____ Suf: _____
Address1: 3701_CENTRAL_AVENUE_____ Short Comments:
Address2: _____ S-OGC_97-2190_____
City: ST._PETERSBURG_____ ST: FL Zip: 33713-____ Country: _____

P A Y M E N T (S)

SYS$PAYT	Distr CL Area..	Object Code/Description.....:	Payment Amount.....	Reference#	Applic/ Fund	S T A CO
383794__	SWD___	012008 LCT-PENALTIES__	_____$1,762.50	OGC97-2190	___ ECOSYS	CO
_____	_____	_____ _____	_____	_____	___ _____	__
_____	_____	_____ _____	_____	_____	___ _____	__
_____	_____	_____ _____	_____	_____	___ _____	__
_____	_____	_____ _____	_____	_____	___ _____	__

COMMIT FREQUENTLY _____$1,762.50 Payment total
Press_<TAB>_to_accept_Collection_Point_or_enter_F&A._____
Count: *1 <Replace>

Chemical Analysis Report

SW-DIST-1999-10-12-01

Florida Department of Environmental Protection
Central Laboratory
2600 Blair Stone Road
Tallahassee, FL 32399-2400
CompQAP# 870688G

Event Description: **Howco Environmental Services**

Request ID: **RQ-1999-10-11-24**

Customer: **SW-DIST**

Project ID: **OTHER-WSM**

Job: TLH-1999-10-12-31	Group: Pesticides
Job: TLH-1999-10-12-32	Group: Pesticides
Job: TLH-1999-10-12-32	Group: Priority Organic Pollutants
Job: TLH-1999-10-12-33	Group: Metals
Job: TLH-1999-10-12-34	Group: Pesticides
Job: TLH-1999-10-12-35	Group: Metals
Job: TLH-1999-10-12-36	Group: Priority Organic Pollutants
Job: TLH-1999-10-12-38	Group: Priority Organic Pollutants

Send Reports to
FL Dept. of Environmental Protection
FL Dept. of Environmental Protection
3804 Coconut Palm Drive
Tampa, FL 33619
Attn: Maria de la Cantera

For additional information please contact
Timothy W. Fitzpatrick
Yuh-Hsu Pan, Ph.D.
Julio Arrecis, Ph.D.
Liang-Tsair Lin, Ph.D.
Suncom 277-2571 Phone (850) 487-2571

Certified by: [signature]

Date: 11-18-99

Report Printed Date: Nov 17, 1999

Abbreviations and data remark codes

A - Value reported is the mean of two or more determinations
B - Results based on colony counts outside the acceptable range.
I - The reported value is between the laboratory method detection limit and the laboratory practical quantitation limit.
J - Estimated value
K - Actual value is known to be less than value given
L - Actual value is known to be greater than value given
N - Presumptive evidence of presence of material.
O - Sampled, but analysis lost or not performed.
Q - Sample held beyond normal holding time.
T - Value reported is less than the criterion of detection.
U - Material was analyzed for but not detected; The value reported is the minimum detection limit.
V - Analyte was detected in both sample and method blank.
Y - The laboratory analysis was from an unpreserved or improperly preserved sample. The data may not be accurate
Z - Colonies were too numerous to count (TNTC).

Sample Location: OES SLUDGE

Field ID: OES SLUDGE

Collection Date/Time: 10/11/1999 9:40 AM

Matrix: WAS-SOLID

Lab ID: 412073	Storet Code	Component	Result	Code	Units
Test: Chlorinated (phenoxy acid) herbicides in TCLP samples by HPLC/UV. (EPA 1311)					
Comments: 1) Sample could not be analyzed by HPLC/UV analysis due to very high matrix interference. 2) The sample w as re-extracted and qualitatively analyzed by LC/MS. 3) This procedure has not been fully validated. 4) No positives are found at the reported detection limits.					
	39730	2,4-D	2.0	U	ug/L
	39760	Silvex	2.0	U	ug/L

Lab ID: 412075	Storet Code	Component	Result	Code	Units
Test: TCLP for Semi-volatile organic pollutants by GC/MS. (EPA 625/ 8270 mod.)					
Comments: Insufficient sample to extract matrix spikes.					
	39340	gamma-BHC	11	U	ug/L
	77151	m,p-Cresols	140		ug/L
	77152	o-Cresol	23	I	ug/L
	34571	1,4-Dichlorobenzene	7.1	U	ug/L
	34611	2,4-Dinitrotoluene	7.1	U	ug/L
	39390	Endrin	11	U	ug/L
	39700	Hexachlorobenzene	7.1	U	ug/L
	34391	Hexachlorobutadiene	21	U	ug/L
	34396	Hexachloroethane	21	U	ug/L
	34447	Nitrobenzene	14	U	ug/L
	39032	Pentachlorophenol	48	I	ug/L
	77687	2,4,5-Trichlorophenol	7.1	U	ug/L
	34621	2,4,6-Trichlorophenol	7.1	U	ug/L
		Pyridine	29	U	ug/L

Lab ID: 412077	Storet Code	Component	Result	Code	Units
Test: Mercury in TCLP samples using cold vapor AA spectroscopy. (EPA 245.1)					
		Mercury	0.0010	U	mg/L

Lab ID: 412079	Storet Code	Component	Result	Code	Units
Test: Organochlorine pesticides in TCLP samples by GC/ECD. (EPA 8080 mod.)					
		Chlordane	0.20	U	ug/L
		Endrin	0.050	U	ug/L
		Gamma-BHC	0.010	U	ug/L
		Heptachlor	0.010	U	ug/L
		Heptachlor Epoxide	0.020	U	ug/L
		Methoxychlor	0.050	U	ug/L

	Toxaphene	0.75	U	ug/L

Lab ID: 412081	Storet Code	Component	Result	Code	Units
Test: Metals, total recoverable, in TCLP samples using trace-ICP emission spectroscopy. (EPA 6010 mod.)					
		Arsenic	0.040	U	mg/L
		Barium	0.79	A	mg/L
		Cadmium	0.0090	U	mg/L
		Chromium	0.11	I	mg/L
		Lead	0.050	U	mg/L
		Selenium	0.035	U	mg/L
		Silver	0.010	U	mg/L

Lab ID: 412083	Storet Code	Component	Result	Code	Units
Test: Volatile organic pollutants in TCLP samples by GC/MS. (EPA 8260)					

Comments:
The MDLs are elevated due to required dilution of the sample matrix.

	Benzene	12	I	ug/L
	Bromoform	25	U	ug/L
	Carbon tetrachloride	10	U	ug/L
	Chlorobenzene	10	U	ug/L
	Chloroform	10	U	ug/L
	Dibromochloromethane	10	U	ug/L
	1,2-Dichlorobenzene	10	U	ug/L
	1,3-Dichlorobenzene	10	U	ug/L
	1,4-Dichlorobenzene	10	U	ug/L
	1,1-Dichloroethane	10	U	ug/L
	1,2-Dichloroethane	10	U	ug/L
	1,1-Dichloroethene	10	U	ug/L
	1,2-Dichloropropane	10	U	ug/L
	Ethylbenzene	36	I	ug/L
	Methylene chloride	25	U	ug/L
	1,1,2,2-Tetrachloroethane	10	U	ug/L
	Tetrachloroethene	10	U	ug/L
	Toluene	140	A	ug/L
	1,1,1-Trichloroethane	10	U	ug/L
	1,1,2-Trichloroethane	10	U	ug/L
	Trichloroethene	10	U	ug/L
	Vinyl chloride	25	U	ug/L
	Xylenes (total)	180	A	ug/L
	2-Butanone	500	U	ug/L

Sample Location: TRIP BLANK

Field ID: TRIP BLANK

Collection Date/Time: 10/11/1999 9:40 AM

Matrix: W-TRIP-BLK

Lab ID: 412088	Storet Code	Component	Result	Code	Units
Test: Volatile organic pollutants in acid preserved water matrices by GC/MS. (EPA 624/8260 mod.)					

78124	Benzene	0.20	U	ug/L
32101	Bromodichloromethane	0.20	U	ug/L
32104	Bromoform	0.50	U	ug/L
34413	Bromomethane	0.50	U	ug/L
32102	Carbon tetrachloride	0.20	U	ug/L
34301	Chlorobenzene	0.20	U	ug/L
34311	Chloroethane	0.50	U	ug/L
34576	2-Chloroethylvinyl ether	0.50	U	ug/L
32106	Chloroform	0.20	U	ug/L
34418	Chloromethane	0.50	U	ug/L
32105	Dibromochloromethane	0.20	U	ug/L
34536	1,2-Dichlorobenzene	0.20	U	ug/L
34566	1,3-Dichlorobenzene	0.20	U	ug/L
34571	1,4-Dichlorobenzene	0.20	U	ug/L
34496	1,1-Dichloroethane	0.20	U	ug/L
34531	1,2-Dichloroethane	0.20	U	ug/L
34501	1,1-Dichloroethene	0.20	U	ug/L
34546	trans-1,2-Dichloroethene	0.50	U	ug/L
34541	1,2-Dichloropropane	0.20	U	ug/L
34704	cis-1,3-Dichloropropene	0.50	U	ug/L
34699	trans-1,3-Dichloropropene	0.20	U	ug/L
34371	Ethylbenzene	0.50	U	ug/L
34423	Methylene chloride	0.50	U	ug/L
34516	1,1,2,2-Tetrachloroethane	0.20	U	ug/L
34475	Tetrachloroethene	0.20	U	ug/L
78131	Toluene	0.50	U	ug/L
34506	1,1,1-Trichloroethane	0.20	U	ug/L
34511	1,1,2-Trichloroethane	0.20	U	ug/L
39180	Trichloroethene	0.20	U	ug/L
34488	Trichlorofluoromethane	0.50	U	ug/L
39175	Vinyl chloride	0.50	U	ug/L
81551	Xylenes (total)	0.50	U	ug/L

Sample Location: WWT SLUDGE

Field ID: WWT SLUDGE

Collection Date/Time: 10/11/1999 10:00 AM

Matrix: WAS-SOLID

Lab ID: 412074	Storet Code	Component	Result	Code	Units

Test: Chlorinated (phenoxy acid) herbicides in TCLP samples by HPLC/UV. (EPA 1311)

Comments:
1) Sample could not be analyzed by HPLC/UV analysis due to very high matrix interference. 2) The sample was re-extracted and qualitatively analyzed by LC/MS. 3) This procedure has not been fully validated. 4) No positives are found at the reported detection limits.

39730	2,4-D	2.0	U	ug/L
39760	Silvex	2.0	U	ug/L

Lab ID: 412076	Storet Code	Component	Result	Code	Units

Test: TCLP for Semi-volatile organic pollutants by GC/MS. (EPA 625/ 8270 mod.)

Comments:
Insufficient sample to extract matrix spikes.

39340	gamma-BHC	3.0	U	ug/L
77151	m,p-Cresols	5.7	I	ug/L
77152	o-Cresol	2.5	T	ug/L
34571	1,4-Dichlorobenzene	2.0	U	ug/L
34611	2,4-Dinitrotoluene	2.0	U	ug/L
39390	Endrin	3.0	U	ug/L
39700	Hexachlorobenzene	2.0	U	ug/L
34391	Hexachlorobutadiene	6.0	U	ug/L
34396	Hexachloroethane	6.0	U	ug/L
34447	Nitrobenzene	4.0	U	ug/L
39032	Pentachlorophenol	6.0	U	ug/L
77687	2,4,5-Trichlorophenol	2.0	U	ug/L
34621	2,4,6-Trichlorophenol	2.0	U	ug/L
	Pyridine	8.0	U	ug/L

Lab ID: 412078 **Storet Code** **Component** **Result** **Code** **Units**

Test: Mercury in TCLP samples using cold vapor AA spectroscopy. (EPA 245.1)

	Mercury	0.0010	U	mg/L

Lab ID: 412080 **Storet Code** **Component** **Result** **Code** **Units**

Test: Organochlorine pesticides in TCLP samples by GC/ECD. (EPA 8080 mod.)

	Chlordane	0.20	U	ug/L
	Endrin	0.050	U	ug/L
	Gamma-BHC	0.010	U	ug/L
	Heptachlor	0.010	U	ug/L
	Heptachlor Epoxide	0.020	U	ug/L
	Methoxychlor	0.050	U	ug/L
	Toxaphene	0.75	U	ug/L

Lab ID: 412082 **Storet Code** **Component** **Result** **Code** **Units**

Test: Metals, total recoverable, in TCLP samples using trace-ICP emission spectroscopy. (EPA 6010 mod.)

	Arsenic	0.040	U	mg/L
	Barium	0.39		mg/L
	Cadmium	0.0090	U	mg/L
	Chromium	0.18		mg/L
	Lead	0.050	U	mg/L
	Selenium	0.035	U	mg/L
	Silver	0.010	U	mg/L

Lab ID: 412084 **Storet Code** **Component** **Result** **Code** **Units**

Test: Volatile organic pollutants in TCLP samples by GC/MS. (EPA 8260)

Comments:
The MDLs are elevated due to required dilution of the sample matrix.

	Benzene	600		ug/L

Bromoform	25	U	ug/L
Carbon tetrachloride	10	U	ug/L
Chlorobenzene	10	U	ug/L
Chloroform	10	U	ug/L
Dibromochloromethane	10	U	ug/L
1,2-Dichlorobenzene	10	U	ug/L
1,3-Dichlorobenzene	10	U	ug/L
1,4-Dichlorobenzene	10	U	ug/L
1,1-Dichloroethane	10	U	ug/L
1,2-Dichloroethane	10	U	ug/L
1,1-Dichloroethene	10	U	ug/L
1,2-Dichloropropane	10	U	ug/L
Ethylbenzene	180		ug/L
Methylene chloride	25	U	ug/L
1,1,2,2-Tetrachloroethane	10	U	ug/L
Tetrachloroethene	24	I	ug/L
Toluene	1500		ug/L
1,1,1-Trichloroethane	10	U	ug/L
1,1,2-Trichloroethane	10	U	ug/L
Trichloroethene	31	I	ug/L
Vinyl chloride	25	U	ug/L
Xylenes (total)	890		ug/L
2-Butanone	500	U	ug/L

Quality Control Report

TLH-1999-10-12-31

Test	Analyte	LFB %Recovery	MS %Recovery	Precision %RPD	Precision %RSD
TCLP-AHERB					
	2,4-D	101	213* 228*	6.46	
	Silvex	99.8	81.5 86.1	5.44	

TLH-1999-10-12-32

Test	Analyte	LFB %Recovery	MS %Recovery	Precision %RPD	Precision %RSD
TCLP-BNA					
	1,4-Dichlorobenzene	71.2 71.6		0.504	
	2,4,5-Trichlorophenol	95.9 96.0		0.188	
	2,4,6-Trichlorophenol	85.9 86.3		0.557	
	2,4-Dinitrotoluene	92.3 93.6		1.36	
	Hexachlorobenzene	86.3 86.9		0.670	
	Hexachlorobutadiene	62.2 65.1		4.56	
	Hexachloroethane	63.2 64.5		1.97	
	Nitrobenzene	92.3 92.4		0.130	
	Pentachlorophenol	94.2 95.6		1.41	
	Pyridine	57.7 60.9		5.33	
	m,p-Cresols	75.1 76.2		1.45	
	o-Cresol	80.0 81.2		1.56	

TLH-1999-10-12-33

Test	Analyte	LFB %Recovery	MS %Recovery	Precision %RPD	Precision %RSD
TCLP-HG-H					
	Mercury	95.1	86.5 86.9	0.531	

TLH-1999-10-12-34

Test	Analyte	LFB %Recovery	MS %Recovery	Precision %RPD	Precision %RSD
TCLP-PS-CL					
	Endrin	114	112 113	0.462	
	Gamma-BHC	111	109 109	0.183	
	Heptachlor	111	113 113	0.615	
	Heptachlor Epoxide	112	112 112	0.0099	
	Methoxychlor	119	117 118	0.353	

TLH-1999-10-12-35

Test	Analyte	LFB %Recovery	MS %Recovery	Precision %RPD	Precision %RSD
TCLP-TR					
	Arsenic	99.6	101 103	2.70	
	Barium	101	101 103	2.19	
	Cadmium	97.4	96.9 99.6	2.75	
	Chromium	98.9	101 98.5	2.53	
	Lead	100	101 103	2.06	
	Selenium	104	106 108	1.99	
	Silver	102	102 99.4	2.13	

TLH-1999-10-12-36

Test	Analyte	LFB %Recovery	MS %Recovery	Precision %RPD	Precision %RSD
TCLP-VOC					
	1,1,1-Trichloroethane	92.8 95.8	103 104	1.16 3.18	
	1,1,2,2-Tetrachloroethane	109 114	125 127	1.11 3.77	

* – Item failed QC

(LFB - Laboratory Fortified Blank; MS - Matrix Spike; RPD - Relative Percent Difference; RSD - Relative Standard Deviation)

1,1,2-Trichloroethane	108	110	119	122	2.20	2.65
1,1-Dichloroethane	106	109	118	122	2.78	3.17
1,1-Dichloroethene	100	96.2	108	112	3.87	3.99
1,2-Dichlorobenzene	105	99.4	109	112	2.71	5.29
1,2-Dichloroethane	103	107	115	116	1.38	3.05
1,2-Dichloropropane	106	106	111	118	0.566	5.94
1,3-Dichlorobenzene	102	95.6	106	108	1.68	6.09
1,4-Dichlorobenzene	94.8	99.0	101	109	4.33	7.25
Benzene	107	111	118	123	3.12	3.82
Bromoform	101	102	105	99.8	1.38	5.27
Carbon tetrachloride	85.2	87.6	95.6	95.8	0.209	2.78
Chlorobenzene	110	112	121	126	1.80	3.40
Chloroform	97.8	99.8	106	109	2.02	3.17
Dibromochloromethane	110	111	110	114	1.45	3.21
Ethylbenzene	111	115	115	116	1.21	3.89
Methylene chloride	122	125	103	121	16.5	2.11
Tetrachloroethene	94.6	99.0	106	109	2.41	4.55
Toluene	112	119	112	117	4.35	5.72
Trichloroethene	110	110	113	116	0.182	2.27
Vinyl chloride	120	125	126	143	12.8	3.91
Xylenes (total)	102	98.5	106	108	1.68	3.79

TLH-1999-10-12-38

Test	Analyte	LFB %Recovery		MS %Recovery		Precision %RPD	Precision %RSD
W-VOC-MS-A							
	1,1,1-Trichloroethane	87.2	92.4	101	101	0.396	5.79
	1,1,2,2-Tetrachloroethane	119	126	120	122	1.49	5.40
	1,1,2-Trichloroethane	106	108	115		0.0	2.43
	1,1-Dichloroethane	104	108	115	116	0.693	4.16
	1,1-Dichloroethene	88.0	94.0	103	99.4	3.75	6.59
	1,2-Dichlorobenzene	101	102	110	111	0.362	0.591
	1,2-Dichloroethane	105	106	115	116	0.568	0.867
	1,2-Dichloropropane	104	105	113	116	1.53	1.92
	1,3-Dichlorobenzene	99.4	99.6	108	108	0.201	0.370
	1,4-Dichlorobenzene	96.4	97.6	104	105	1.15	1.24
	Benzene	107	110	120	121	0.995	2.95
	Bromodichloromethane	103	104	107	110	1.35	2.58
	Bromoform	102	98.6	90.8	97.0	3.59	6.60
	Carbon tetrachloride	80.0	85.4	91.6	94.0	2.59	6.53
	Chlorobenzene	110	115	123	124	1.29	4.44
	Chloroform	92.8	96.0	104	105	0.191	3.39
	Dibromochloromethane	105	108	100	107	2.44	6.38
	Ethylbenzene	114	118	107	115	3.63	7.05
	Methylene chloride	121	125	106	125	15.9	3.42
	Tetrachloroethene	96.0	99.4	109	109	0.366	3.48
	Toluene	114	116	107	115	2.43	7.75
	Trichloroethene	105	105	111	113	0.762	1.07
	Trichlorofluoromethane	105	109	123	124	0.647	3.94
	Xylenes (total)	101	99.8	78.8	89.6	1.06	12.8
	cis-1,3-Dichloropropene	103	105	108	112	2.31	3.46
	trans-1,2-Dichloroethene	108	112	122	124	2.11	3.81
	trans-1,3-Dichloropropene	101	97.6	102	97.4	3.23	4.81

Login Authorisatio eport for SW-DIST-1999-10-12-0 n 18-OCT-1999 10:33

Howco Environmental Services

Project: OTHER-WSM
Request ID: RQ-1999-10-11-24

Job ID: *TLH-1999-10-12-31* ***Job Status:*** *V*

Sample	St	Field ID	Sampling Location
412073 TCLP-AHERB	V	OES SLUDGE	OES SLUDGE
412074 TCLP-AHERB	V	WWT SLUDGE	WWT SLUDGE

Job ID: *TLH-1999-10-12-32* ***Job Status:*** *V*

Sample	St	Field ID	Sampling Location
412075 TCLP-BNA	V	OES SLUDGE	OES SLUDGE
412076 TCLP-BNA	V	WWT SLUDGE	WWT SLUDGE

Job ID: *TLH-1999-10-12-33* ***Job Status:*** *V*

Sample	St	Field ID	Sampling Location
412077 TCLP-HG-H	V	OES SLUDGE	OES SLUDGE
412078 TCLP-HG-H	V	WWT SLUDGE	WWT SLUDGE

Job ID: *TLH-1999-10-12-34* ***Job Status:*** *V*

Sample	St	Field ID	Sampling Location
412079 TCLP-PS-CL	V	OES SLUDGE	OES SLUDGE
412080 TCLP-PS-CL	V	WWT SLUDGE	WWT SLUDGE

Job ID: *TLH-1999-10-12-35* ***Job Status:*** *V*

Sample	St	Field ID	Sampling Location
412081 TCLP-TR	V	OES SLUDGE	OES SLUDGE
412082 TCLP-TR	V	WWT SLUDGE	WWT SLUDGE

Job ID: *TLH-1999-10-12-36* ***Job Status:*** *V*

Sample	St	Field ID	Sampling Location
412083 TCLP-VOC	V	OES SLUDGE	OES SLUDGE
412084 TCLP-VOC	V	WWT SLUDGE	WWT SLUDGE

Job ID: *TLH-1999-10-12-38* ***Job Status:*** *V*

Sample	St	Field ID	Sampling Location
412088 W-VOC-MS	V	TRIP BLANK	TRIP BLANK

RQ ID: 1999-10-17-24

Cooler Check

Cooler ID	Ice Present? Yes	Ice Present? No	If No, Temperature	Evidence Tape Present? Yes	Evidence Tape Present? No	Evidence Tape Intact? Yes	Evidence Tape Intact? No	Tracking Number
285	X				X			811465255710

Note: If the the temperature of a cooler is above 6° C or an evidence seal is damaged then identify the bottles, in the affected cooler(s), on back of form.

Shipping Method: FedEx Date/Time of Receipt: 9:20 10/12/99

Acid Preserved Samples pH Checked: pH </=2 ? Yes___ No___ NA X
If No, fill out back of form.

Base Preserved Samples pH Checked: All OK? Yes___ No___ NA X
(W-CN, OV-CN - pH >/= 12), (W-SULFDE-F, W-SULFIDE - pH >/= 9)
If No, fill out back of form.

Evidence Tape on Bottles Present: Yes___ No X
If Yes, is it intact? Yes___ No___
If not intact then fill out back of form.

Condition of Containers:
Loose Caps: Yes___ No X
If Yes, fill out back of form.

Broken Containers: Yes X No___
If Yes, fill out back of form.

Chain Of Custody Form Included? Yes X No___ Field Sheet(s) Included? Yes X No___
If Yes verify receipt of all containers listed then sign custody form. Document discrepancies (i.e. missing containers) on COC form.

Event ID: SW-DIST-1999-10-12-01

Coolers Unpacked/Checked by: JA/HW Date: 10-12-99

Event Logged in by: HW

NA - Not Applicable (i.e. sediment samples)

Florida Department of Environmental Protection

Central Laboratory Sample Submittal Form

Request Number: RQ-1999-10-11-24

Howco Environmental Services

Event ID *

Customer: SW-DIST

Project ID: OTHER-WSM

PMAS:

Requester: Troy Eastman

Collected By: Randall H. Strauss

Field Parameters Measured By:

Field Report Prepared By:

Send Final Report To:

Lab ID *	Location / Field ID	Matrix (Include type e.g. Salt, Fresh, etc)	Temp (C)	pH	Latitude	Longitude	Comp / Grab	Collection (begin) Date Time	Collection (end) Date Time	Tot Res Chlorine (mg/L)	Diss Oxygen (mg/L)	Storet Station Number	Sample Depth	Salinity (PPTh) / Sp Conductance (umho/cm)	NPDES Number	Bottle Group(s) **	Comments
	OES Sludge	Waste Sludge			° ' "	° ' "	☒ Comp ☐ Grab	10/11/99 0940	10/11/99 0940				☐ m ☐ ft	☐ Salinity (PPTh) ☐ Sp Conductance (umho/cm)			
	WWT Sludge	Waste Sludge			° ' "	° ' "	☒ Comp ☐ Grab	10/11/99 1000	10/11/99 1000				☐ m ☐ ft	☐ Salinity (PPTh) ☐ Sp Conductance (umho/cm)			
	Trip Blank	Fresh water			° ' "	° ' "	☐ Comp ☒ Grab						☐ m ☒ ft	☐ Salinity (PPTh) ☐ Sp Conductance (umho/cm)			
					° ' "	° ' "	☐ Comp ☐ Grab						☐ m ☐ ft	☐ Salinity (PPTh) ☐ Sp Conductance (umho/cm)			

Relinquished By:	Date/Time	Received By:	Date/Time	Relinquished By:	Date/Time	Received By:	Date/Time
		JA/HW	9:20 10-12-99				

* Shaded Areas for Lab use only.

** Please see reverse side for Bottle Group information.

STATE OF FLORIDA
DEPARTMENT OF ENVIRONMENTAL PROTECTION

CHAIN OF CUSTODY RECORD

Page 1 of 1

PROJECT NAME: Howco Environmental Services

SUBMITTING AGENCY NAME:

SUBMITTING AGENCY CODE:

SAMPLER SIGNATURE(S): Randall A. Strauss

RQ #: 1999-10-11-24

MODULE #: 3069

STATION/ LOCATION/ NUMBER	DATE M/D/Y	TIME //////	COMP/ GRAB	# OF CONTAINERS	PARAMETERS* TCLP-VOC	TCLP-AHERB	TCLP-BNA	TCLP-416-H	TCLP-PS-CL	TCLP-TR		Field ID #
OES Sludge	10/11/99	0940	Comp	4	X	X	X	X	X	X		25383
WWT Sludge	10/11/99	1000	Comp	4	X	X	X	X	X	X		25384

Sealed and Relinquished by: Randall A. Strauss — Date/ Time: 10/11/99 @ 2245 — Method of Dispatch: FEDEX — Opened and Accepted by: JA/HW — Date/ Time: 9:20 10-12-99

Sealed and Relinquished by: — Date/ Time: — Method of Dispatch: — Opened and Accepted by: — Date/ Time:

Sealed and Relinquished by: — Date/ Time: — Method of Dispatch: — Opened and Accepted by: — Date/ Time:

REMARKS:

* Metals, Volatiles, Acid B/N Extr., Pesticides, PCB's, Nutrients, Wet Chem, Toxicity, Algal Assay, Chlorophyll, etc.

STATE OF FLORIDA
DEPARTMENT OF ENVIRONMENTAL PROTECTION

CHAIN OF CUSTODY RECORD

Page 1 of 1

PROJECT NAME	SUBMITTING AGENCY NAME	SUBMITTING AGENCY CODE
Howco Environmental Services		

SAMPLER SIGNATURE(S)

Randall Stevens

RQ #: 1999-10-11-24

MODULE #: 3069

STATION/ LOCATION/ NUMBER	DATE M/D/Y	TIME #####	COMP/ GRAB	# OF CONTAINERS	PARAMETERS* TCLP-VOC	TCLP-AHERB	TCLP-BNA	TCLP-HG-H	TCLP-PS-CL	TCLP-TR			Field ID #
OES Sludge	10/11/99	0940	Comp	4	X	X	X	X	X	X			25383
WWT Sludge	10/11/99	1000	Comp	4	X	X	X	X	X	X			25384

Sealed and Relinquished by:	Date/ Time	Method of Dispatch:	Opened and Accepted by:	Date/ Time
Randall Stevens	10/11/99 @ 2245	FEDEX		
Sealed and Relinquished by:	Date/ Time	Method of Dispatch:	Opened and Accepted by:	Date/ Time
Sealed and Relinquished by:	Date/ Time	Method of Dispatch:	Opened and Accepted by:	Date/ Time

REMARKS:

* Metals, Volatiles, Acid B/N Extr., Pesticides, PCB's, Nutrients, Wet Chem, Toxicity, Algal Assay, Chlorophyll, etc.

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

Nov 17, 1999
FAXed.

Florida Department of Environmental Protection
Southwest District
3804 Coconut Palm Drive
Tampa, Florida 33619
Attn: Mr. Randall Strauss

November 17, 1999

RE: OGC FILE NO. 97-2190
Quarterly Sampling Results

Dear Mr. Strauss:

As we have previously discussed I am forwarding to your attention the results of our second quarterly sampling of the OES tank 111 and the Wastewater Treatment Sludge.

As you will recall, the filter press cake was not as consistent as previous sampling efforts. For whatever reason we were unable to get the product to cake very well. The results of the analysis on this sample subsequently came back with a TCLP Benzene reading which appears to have exceeded the regulatory level of .5 mg/l. I would be interested to see the Departments results at your earliest convenience. We have drummed the material in question and it is my intention to manage the sludge from this batch as Hazardous Waste.

Under the requirements of the consent order we will sample the next two batches of the filter press sludge. This first sampling will be Monday, November 22 at approximately 9:30 am.

If you have any questions or comments regarding this information, please call me at your earliest convenience. I'll see you Monday for the sampling.

Thanks for your prompt attention concerning this matter.

Sincerely,

David J. Roehm

cc: Tim Hagan; Howco Environmental Services

USBIOSYSTEMS

Client #: TAM-97-100315
Address: HOWCO Environmental Services
3701 Central Avenue
St. Petersburg, FL 33713
Attn: Michael Ty Pham

Page: Page 1 of 3
Date: 10/20/99
Log #: L38924-1

Sample Description:

Quarterly

Label: OES Tank 111
Date Sampled: 10/06/99
Time Sampled: 09:40
Date Received: 10/06/99
Collected By: J.Garrett

Parameter	Results	Units	Method	Reportable Limit	Extr. Date	Analysis Date	Analyst
TCLP Semivolatile Organic Compounds							
o-Cresol	BDL	mg/l	3510/8270	0.10	10/18	10/18	GM
m,p-Cresols	48	mg/l	3510/8270	0.10	10/18	10/18	GM
2,4-Dinitrotoluene	BDL	mg/l	3510/8270	0.10	10/18	10/18	GM
Hexachlorobenzene	BDL	mg/l	3510/8270	0.10	10/18	10/18	GM
Hexachlorobutadiene	BDL	mg/l	3510/8270	0.10	10/18	10/18	GM
Hexachloroethane	BDL	mg/l	3510/8270	0.10	10/18	10/18	GM
Nitrobenzene	BDL	mg/l	3510/8270	0.10	10/18	10/18	GM
Pentachlorophenol	BDL	mg/l	3510/8270	0.50	10/18	10/18	GM
Pyridine	BDL	mg/l	3510/8270	0.80	10/18	10/18	GM
2,4,5-Trichlorophenol	BDL	mg/l	3510/8270	0.10	10/18	10/18	GM
2,4,6-Trichlorophenol	BDL	mg/l	3510/8270	0.10	10/18	10/18	GM
Dilution Factor	10		3510/8270		10/18	10/18	GM
Surrogate Recoveries:							
2-Fluorophenol	25.0	%	3510/8270	21-103	10/18	10/18	GM
Phenol-d5	17.0	%	3510/8270	13-106	10/18	10/18	GM
Nitrobenzene-d5	52.0	%	3510/8270	16-112	10/18	10/18	GM
2-Fluorobiphenyl	70.0	%	3510/8270	17-115	10/18	10/18	GM
2,4,6-Tribromophenol	91.0	%	3510/8270	29-120	10/18	10/18	GM
Terphenyl-d14	89.0	%	3510/8270	35-115	10/18	10/18	GM
TCLP Metals							
Arsenic	BDL	mg/l	3010/6010	0.010	10/14	10/14	PVP
Barium	2.6	mg/l	3010/6010	0.010	10/14	10/14	PVP
Cadmium	BDL	mg/l	3010/6010	0.0050	10/14	10/14	PVP
Chromium	0.014	mg/l	3010/6010	0.0050	10/14	10/14	PVP
Lead	0.012	mg/l	3010/6010	0.0050	10/14	10/14	PVP
Selenium	0.010	mg/l	3010/6010	0.010	10/14	10/14	PVP
Silver	BDL	mg/l	3010/6010	0.010	10/14	10/14	PVP
Mercury	BDL	mg/l	7470	0.010	10/15	10/15	ZL

Client #: TAM-97-100315
Address: HOWCO Environmental Services
3701 Central Avenue
St. Petersburg, FL 33713
Attn: Michael Ty Pham

Page: Page 2 of 3
Date: 10/20/99
Log #: L38924-1

Sample Description:

Quarterly

Label: OES Tank 111
Date Sampled: 10/06/99
Time Sampled: 09:40
Date Received: 10/06/99
Collected By: J.Garrett

Parameter	Results	Units	Method	Reportable Limit	Extr. Date	Analysis Date	Analyst
TCLP Volatile Organic Compounds							
Benzene	BDL	mg/l	5030/8260	0.10	10/15	10/15	SV
Chlorobenzene	BDL	mg/l	5030/8260	0.10	10/15	10/15	SV
Chloroform	BDL	mg/l	5030/8260	0.10	10/15	10/15	SV
Carbon Tetrachloride	BDL	mg/l	5030/8260	0.10	10/15	10/15	SV
1,2-Dichloroethane	BDL	mg/l	5030/8260	0.10	10/15	10/15	SV
1,1-Dichloroethene	BDL	mg/l	5030/8260	0.10	10/15	10/15	SV
Methyl Ethyl Ketone	BDL	mg/l	5030/8260	1.0	10/15	10/15	SV
Tetrachloroethene	BDL	mg/l	5030/8260	0.10	10/15	10/15	SV
Trichloroethene	BDL	mg/l	5030/8260	0.10	10/15	10/15	SV
Vinyl Chloride	BDL	mg/l	5030/8260	0.10	10/15	10/15	SV
1,4-Dichlorobenzene	BDL	mg/l	5030/8260	0.10	10/15	10/15	SV
Dilution Factor	1.0		5030/8260		10/15	10/15	SV
Surrogate Recoveries:							
Dibromofluoromethane	106	%	5030/8260	65-131	10/15	10/15	SV
Toluene-D8	88	%	5030/8260	67-128	10/15	10/15	SV
4-Bromofluorobenzene	115	%	5030/8260	67-134	10/15	10/15	SV
TCLP Extraction Date							
TCLP Extraction	10/13	date	1311 EXTR				SH
TCLP ZHE Extraction	10/13	date	1311 ZHE				SV
Chlorinated Herbicides - TCLP							
2,4-D	BDL	mg/l	8151	0.10	10/18	10/19	DM
2,4,5-TP	BDL	mg/l	8151	0.10	10/18	10/19	DM
Dilution Factor	1.0		8151		10/18	10/19	DM
Surrogate Recoveries:							
DCAA	93.0	%	8151	31-128	10/18	10/19	DM
Organochlorine Pesticides - TCLP							
Chlordane	BDL	mg/l	3510/8081	0.010	10/14	10/14	DM
Lindane	BDL	mg/l	3510/8081	0.0010	10/14	10/14	DM
Methoxychlor	BDL	mg/l	3510/8081	0.010	10/14	10/14	DM
Toxaphene	BDL	mg/l	3510/8081	0.060	10/14	10/14	DM
Endrin	BDL	mg/l	3510/8081	0.0020	10/14	10/14	DM
Heptachlor	BDL	mg/l	3510/8081	0.0010	10/14	10/14	DM
Heptachlor Epoxide	BDL	mg/l	3510/8081	0.0010	10/14	10/14	DM
Dilution Factor	1.0		3510/8081		10/14	10/14	DM
Surrogate Recoveries:							
TCMX	67.0	%	3510/8081	20-127	10/14	10/14	DM
Decachlorobiphenyl	32.0	%	3510/8081	24-131	10/14	10/14	DM

Client #: TAM-97-100315
Address: HOWCO Environmental Services
3701 Central Avenue
St. Petersburg, FL 33713
Attn: Michael Ty Pham

Page: Page 3 of 3
Date: 10/20/99
Log #: L38924-1

Sample Description:

Quarterly

Label: OES Tank 111
Date Sampled: 10/06/99
Time Sampled: 09:40
Date Received: 10/06/99
Collected By: J.Garrett

Parameter	Results	Units	Method	Reportable Limit	Extr. Date	Analysis Date	Analyst
Organochlorine Pesticides - TCLP (continued)							

BDL = Below Reportable Limit
* Compounds are Screened Only, with an estimated detection limit.
All analyses were performed using EPA, ASTM, USDF, or Standard Methods.
All analyses were performed within EPA holding times unless otherwise noted.
Analyses are reported in dry weight unless otherwise indicated by units.

QAP# 960126
SUB DOH# 86122,86109,E85348
SC CERT# 96031001
ELPAT# 13801
VA CERT# 00395
DOH# E86240,86356
ADEM ID# 40850
IN CERT# 02985
GA CERT# 917
USDA Soil Permit# S-35240
NC CERT# 444
MA CERT# M-FL449
CT CERT# PH-0122

Respectfully submitted,
for
Steve Walton
Client Technical Svcs. Manager

Client #: TAM-97-100315
Address: HOWCO Environmental Services
3701 Central Avenue
St. Petersburg, FL 33713
Attn: Michael Ty Pham

Page: Page 1 of 3
Date: 10/20/99
Log #: L38924-2

Sample Description:

Quarterly

Label: WWT Sludge
Date Sampled: 10/06/99
Time Sampled: 10:00
Date Received: 10/06/99
Collected By: J.Garrett

Parameter	Results	Units	Method	Reportable Limit	Extr. Date	Analysis Date	Analyst
TCLP Semivolatile Organic Compounds							
o-Cresol	BDL	mg/l	3510/8270	0.10	10/18	10/18	GM
m,p-Cresols	BDL	mg/l	3510/8270	0.10	10/18	10/18	GM
2,4-Dinitrotoluene	BDL	mg/l	3510/8270	0.10	10/18	10/18	GM
Hexachlorobenzene	BDL	mg/l	3510/8270	0.10	10/18	10/18	GM
Hexachlorobutadiene	BDL	mg/l	3510/8270	0.10	10/18	10/18	GM
Hexachloroethane	BDL	mg/l	3510/8270	0.10	10/18	10/18	GM
Nitrobenzene	BDL	mg/l	3510/8270	0.10	10/18	10/18	GM
Pentachlorophenol	BDL	mg/l	3510/8270	0.50	10/18	10/18	GM
Pyridine	BDL	mg/l	3510/8270	0.80	10/18	10/18	GM
2,4,5-Trichlorophenol	BDL	mg/l	3510/8270	0.10	10/18	10/18	GM
2,4,6-Trichlorophenol	BDL	mg/l	3510/8270	0.10	10/18	10/18	GM
Dilution Factor	10		3510/8270		10/18	10/18	GM
Surrogate Recoveries:							
2-Fluorophenol	17.0	%	3510/8270	21-100	10/18	10/18	GM
Phenol-d5	13.0	%	3510/8270	13-108	10/18	10/18	GM
Nitrobenzene-d5	40.0	%	3510/8270	16-112	10/18	10/18	GM
2-Fluorobiphenyl	53.0	%	3510/8270	17-115	10/18	10/18	GM
2,4,6-Tribromophenol	63.0	%	3510/8270	29-120	10/18	10/18	GM
Terphenyl-d14	63.0	%	3510/8270	35-115	10/18	10/18	GM
TCLP Metals							
Arsenic	BDL	mg/l	3010/6010	0.010	10/14	10/14	PVP
Barium	1.2	mg/l	3010/6010	0.010	10/14	10/14	PVP
Cadmium	BDL	mg/l	3010/6010	0.0050	10/14	10/14	PVP
Chromium	0.0087	mg/l	3010/6010	0.0050	10/14	10/14	PVP
Lead	BDL	mg/l	3010/6010	0.0050	10/14	10/14	PVP
Selenium	BDL	mg/l	3010/6010	0.010	10/14	10/14	PVP
Silver	BDL	mg/l	3010/6010	0.010	10/14	10/14	PVP
Mercury	BDL	mg/l	7470	0.010	10/15	10/15	ZL

Client #: TAM-97-100315
Address: HOWCO Environmental Services
3701 Central Avenue
St. Petersburg, FL 33713
Attn: Michael Ty Pham

Page: Page 2 of 3
Date: 10/20/99
Log #: L38924-2

Sample Description:

Quarterly

Label: WWT Sludge
Date Sampled: 10/06/99
Time Sampled: 10:00
Date Received: 10/06/99
Collected By: J.Garrett

Parameter	Results	Units	Method	Reportable Limit	Extr. Date	Analysis Date	Analyst
TCLP Volatile Organic Compounds							
Benzene	0.69	mg/l	5030/8260	0.10	10/15	10/15	SV
Chlorobenzene	BDL	mg/l	5030/8260	0.10	10/15	10/15	SV
Chloroform	BDL	mg/l	5030/8260	0.10	10/15	10/15	SV
Carbon Tetrachloride	BDL	mg/l	5030/8260	0.10	10/15	10/15	SV
1,2-Dichloroethane	BDL	mg/l	5030/8260	0.10	10/15	10/15	SV
1,1-Dichloroethene	BDL	mg/l	5030/8260	0.10	10/15	10/15	SV
Methyl Ethyl Ketone	BDL	mg/l	5030/8260	1.0	10/15	10/15	SV
Tetrachloroethene	BDL	mg/l	5030/8260	0.10	10/15	10/15	SV
Trichloroethene	BDL	mg/l	5030/8260	0.10	10/15	10/15	SV
Vinyl Chloride	BDL	mg/l	5030/8260	0.10	10/15	10/15	SV
1,4-Dichlorobenzene	BDL	mg/l	5030/8260	0.10	10/15	10/15	SV
Dilution Factor	1.0		5030/8260		10/15	10/15	SV
Surrogate Recoveries:							
Dibromofluoromethane	95	%	5030/8260	65-131	10/15	10/15	SV
Toluene-D8	79	%	5030/8260	67-128	10/15	10/15	SV
4-Bromofluorobenzene	105	%	5030/8260	67-134	10/15	10/15	SV
TCLP Extraction Date							SH
TCLP Extraction	10/13	date	1311 EXTR				SV
TCLP ZHE Extraction	10/13	date	1311 ZHE				
Chlorinated Herbicides - TCLP							
2,4-D	BDL	mg/l	8151	0.10	10/18	10/19	DM
2,4,5-TP	BDL	mg/l	8151	0.10	10/18	10/19	DM
Dilution Factor	1.0		8151		10/18	10/19	DM
Surrogate Recoveries:							
DCAA	116	%	8151	31-128	10/18	10/19	DM
Organochlorine Pesticides - TCLP							
Chlordane	BDL	mg/l	3510/8081	0.010	10/14	10/14	DM
Lindane	BDL	mg/l	3510/8081	0.0010	10/14	10/14	DM
Methoxychlor	BDL	mg/l	3510/8081	0.010	10/14	10/14	DM
Toxaphene	BDL	mg/l	3510/8081	0.060	10/14	10/14	DM
Endrin	BDL	mg/l	3510/8081	0.0020	10/14	10/14	DM
Heptachlor	BDL	mg/l	3510/8081	0.0010	10/14	10/14	DM
Heptachlor Epoxide	BDL	mg/l	3510/8081	0.0010	10/14	10/14	DM
Dilution Factor	1.0		3510/8081		10/14	10/14	DM
Surrogate Recoveries:							
TCMX	75.0	%	3510/8081	20-127	10/14	10/14	DM
Decachlorobiphenyl	66.0	%	3510/8081	24-131	10/14	10/14	DM

Client #: TAM-97-100315
Address: HOWCO Environmental Services
3701 Central Avenue
St. Petersburg, FL 33713
Attn: Michael Ty Pham

Page: Page 3 of 3
Date: 10/20/99
Log #: L38924-2

Sample Description:

Quarterly

Label: WWT Sludge
Date Sampled: 10/06/99
Time Sampled: 10:00
Date Received: 10/06/99
Collected By: J.Garrett

Parameter	Results	Units	Method	Reportable Limit	Extr. Date	Analysis Date	Analyst
Organochlorine Pesticides - TCLP (continued)							

BDL = Below Reportable Limit
* Compounds are Screened Only, with an estimated detection limit.
All analyses were performed using EPA, ASTM, USGS, or Standard Methods.
All analyses were performed within EPA holding times unless otherwise noted.
Analyses are reported in dry weight unless otherwise indicated by units.

QA2# 960126
SUB DOH# 86122,86109,E86048
SC CERT# 96031001
ELPAT# 11801
VA CERT# 00395
DOH# E86240,86356
ADEM ID# 40850
TN CERT# 02985
GA CERT# 917
USDA Soil Permit# S-35240
NC CERT# 444
MA CERT# M-FL449
CT CERT# PH-0122

Respectfully submitted,

Steve Walton
Client Technical Svcs. Manager

USBIOSYSTEMS

Client #: TAM-97-100319
Address: HOWCO Environmental Services
5701 Central Avenue
St. Petersburg, FL 33713
Attn: Michael Ty Pham

Page: Page 1 of 1
Date: 10/28/99
Log #: L39185-1

Sample Description:

Relog of L39185
Quarterly

Label: WWT Sludge
Date Sampled:
Time Sampled:
Date Received: 10/22/99
Collected By: Client

Parameter	Results	Units	Method	Reportable Limit	Extr. Date	Analysis Date	Analyst
TCLP BTEX Compounds							
Benzene	0.56	mg/l	5030/8260	0.10	10/27	10/27	SV
Dilution Factor	1.0		5030/8260		10/27	10/27	SV
Surrogate Recoveries:							
Dibromofluoromethane	82.0	%	5030/8260	65-131	10/27	10/27	SV
Toluene-d8	78.0	%	5030/8260	67-128	10/27	10/27	SV
4-Bromofluorobenzene	93.0	%	5030/8260	67-134	10/27	10/27	SV
TCLP Extraction Date							
TCLP ZHE Extraction	10/26	date	1311 ZHE				SV

BDL - Below Reportable Limit
* Compounds are Screened Only, with an estimated detection limit
All analyses were performed using EPA, ASTM, OSHA, or Standard Methods.
All analyses were performed within EPA holding times unless otherwise noted.
Analyses are reported in dry weight unless otherwise indicated by units

QAP# 960126
DOH# E86340,85350
NC CERT# 444
SUB DOH# 86122,86108,E86046
ADEM DOH 40850
NA CERT# M-FL0445
SC CERT# 96001001
TN CERT# 02960
CT CERT# PH-0122
ELPAC# 10871
LA CERT# 917
VA CERT# 00355
USDA Soil Permit# S-39269

Respectfully submitted,

Thomas Helton, Jr.
Project Manager

CHAIN OF CUSTODY RECORD

USBIOSYSTEMS

Log# 38924 Quote#

Samples INTACT upon arrival?	✓
Received ON WET ICE? Temp	✓
PROPER PRESERVATIVES indicated?	✓
Received WITHIN HOLDING TIMES?	✓
CUSTODY SEALS INTACT?	✓
VOLATILES rec'd W/OUT HEADSPACE?	✓
PROPER CONTAINERS used?	✓

Company Name: Howco PO#: 21041
Address: 3701 Central Ave
City: St. Petersburge State: FL Zip: 33711
Attn: David Roehm Fax#: (727)328-7782
Project Name: Quarterly Proj#:
Sampler Name/Signature: J. Carvett Phone#:

#	Sample ID	Date	Time	Matrix	Codes		TCLP VOL AI	TCLP semi VOL AI	TCLP Metal AI	TCLP Pest/Herb AI		(S Time 3hr					
01	OCS Tank #1	10/6/99	0940	SL		(3) 85/IN	X	X	X	X							
02	WWT Sludge	↓	1000	SL			X	X	X	X							
3																	
4																	
5																	
6																	
7																	
8																	
9																	
0																	

Matrix Codes*

SD	Solid Waste	OL	Oil
GW	Ground Water	SL	Sludge
EFF	Effluent	SO	Soil Sediment
AFW	Analyte Free H_2O	AQ	Aqueous
WW	Waste Water	NA	Nonaqueous
DW	Drinking Water	PE	Petroleum
SU	Surface Water	O	Other (please specify)

Pres/Codes

A. None	G. $Na_2S_2O_3$
B. HNO_3	H. $NaHSO_4$
C. H_2SO_4	I. Ice
D. NaOH	J. MCAA
E. HCL	O. Other
F. MeOH	

REMARKS

ORIGINAL

(Y)/N 5-7 Days (Date required) Y ___ N ✓ None ___ 1 ___ 2 ___ 3 ___ Other ___ (Y) N [initials]

		Relinquished by	Date	Time	Received by	Date	Time
	01-02	[signature]	10-6-99	17:00	CE	10-6-99	17:00
					[signature]	10/12/99	09-

#—

3231 N.W. 7th Avenue
Boca Raton, FL 33431
888-862-LABS
561-447-7373
888-456-4846 Fax
561-447-6136 Fax

C.O.C. # 512414

AREA: SWD Cash Receiving Application CRAF006A
lection Point Log Remitta Tot: $1,762.50

SYS$REMT: 363608 Type: CP Recved Date: 29-OCT-1999 Status: RECEIVED
SYS$RCPT: 300433 PNR: Check #: 032818 Amount: 1,762.50
SSN/FEI#: Name: HOWCO ENVIRONMENTAL SERVICES
First: Middle: Title: Suf:
Address1: 3701 CENTRAL AVENUE Short Comments:
Address2: S-OGC 97-2190 HW
City: ST. PETERSBURG ST: FL Zip: 33713- Country:

P A Y M E N T (S)

SYS$PAYT	Distr CL Area..	Object Code/Description.....:	Payment Amount.....	Reference#	Applic/ Fund	S T A
380739	SWD	012008 LCT-PENALTIES	$1,762.50	97-2190	ECOSYS	CO

COMMIT FREQUENTLY $1,762.50 Payment total
Press <TAB> to accept Collection Point or enter F&A.
Count: *1 <Replace>

Department of Environmental Protection

Jeb Bush
Governor

Southwest District
3804 Coconut Palm Drive
Tampa, Florida 33619

David B. Struhs
Secretary

June 16, 1999

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

RE: Howco Environmental Services
EPA ID No. FLD 152 764 767
Pinellas County
OGC Case No. 97-2190

Dear Mr. Hagan:

Enclosed is the executed Consent Order in the above-referenced case. Please note the following compliance dates and actions required of Howco Environmental Services by conditions of the Consent Order:

1. The initial penalty installment payment of $1762 50 is due within 30 days of the effective date of the Consent Order. Eleven additional installment payments of $1762 50 each will be due by the last day of each following month.
2. Notification is due to the Department within 60 days of the effective date, along with the information specified in paragraph 9.a., if you intend to implement the pollution prevention project of replacing the specified underground piping at the facility with double-walled piping. If you choose not to implement the project, then a $5000.00 payment towards the civil penalty, in addition to the payments specified above, will be due within 90 days of the effective date:
3. Sampling of the wastewater treatment sludge and "OES" for TCLP analysis shall be performed within 30 days of the effective date. After the initial sampling, at least three additional quarterly analyses of these waste streams shall be performed and annual analyses thereafter. Verbal notification to the Department is required at least three days prior to each scheduled sampling event.
4. Within 60 days of the effective date pressure test the underground piping running between the sump and the storage tank in containment area #3, and within 120 days of the effective date provide certification to the Department that all the requirements specified in paragraph 10.b.(1) have been met for providing secondary containment for used oil containers, or ensure that all containers of used oil are stored within secondary containment structures consisting of a dike, berm or retaining wall and a floor that are impervious to used oil.
5. Within 30 days of the deadline after each task for upgrading the used oil tank secondary containment structures as specified in paragraphs 10.b.(2) through 10.b.(5), provide certification by a P.E. to the Department in accordance with the requirements of paragraph 10.b.(6).
6. Within 60 days of the effective date perform pressure testing on all underground piping in use for conveying used oil and/or PCW.

[redacted]

[redacted]

[redacted]

3361341352

HW
97-8190

INTEROFFICE MEMORANDUM

Sensitivity: COMPANY CONFIDENTIAL

Date: 05-Oct-1999 05:21pm
From: Troy Eastman TPA
EASTMAN_T
Dept: Southwest District Office
Tel No: 813/744-6100 Ext. 310

To: Randy Strauss TPA (STRAUSS_R)

Subject: Howco

Randy,

The RQ# for your sampling event is RQ-1999-10-11-24. You did not have an equipment blank listed, but I added one anyway. Let me know if it is not needed. I also checked and they do have 2-butanone on there default list know, so you should get the results for that no problem.

Troy

Chemical Analysis Report

SW-DIST-1999-07-13-01

Florida Department of Environmental Protection
Central Laboratory
2600 Blair Stone Road
Tallahassee, FL 32399-2400
CompQAP# 870688G

Event Description: **Howco Environmental Services**
Request ID: **RQ-1999-07-05-21**
Customer: **SW-DIST**
Project ID: **OTHER-WSM**

Job: TLH-1999-07-13-36	Group: Pesticides
Job: TLH-1999-07-13-37	Group: Pesticides
Job: TLH-1999-07-13-37	Group: Priority Organic Pollutants
Job: TLH-1999-07-13-38	Group: Metals
Job: TLH-1999-07-13-39	Group: Pesticides
Job: TLH-1999-07-13-41	Group: Metals
Job: TLH-1999-07-13-42	Group: Priority Organic Pollutants
Job: TLH-1999-07-13-43	Group: Metals
Job: TLH-1999-07-13-44	Group: Metals

Send Reports to
FL Dept. of Environmental Protection
FL Dept. of Environmental Protection
3804 Coconut Palm Drive
Tampa, FL 33619
Attn: Troy M. Eastman

For additional information please contact
Timothy W. Fitzpatrick
Yuh-Hsu Pan, Ph.D.
Julio Arrecis, Ph.D.
Liang-Tsair Lin, Ph.D.
Suncom 277-2571 Phone (850) 487-2571

Certified by: TLWF

Date: 9/9/99

Report Printed Date: Sep 3, 1999

Abbreviations and data remark codes

A - Value reported is the mean of two or more determinations
B - Results based on colony counts outside the acceptable range.
I - The reported value is between the laboratory method detection limit and the laboratory practical quantitation limit.
J - Estimated value
K - Actual value is known to be less than value given
L - Actual value is known to be greater than value given
N - Presumptive evidence of presence of material.
O - Sampled, but analysis lost or not performed.
Q - Sample held beyond normal holding time.
T - Value reported is less than the criterion of detection.
U - Material was analyzed for but not detected; The value reported is the minimum detection limit.
V - Analyte was detected in both sample and method blank.
Y - The laboratory analysis was from an unpreserved or improperly preserved sample. The data may not be accurate
Z - Colonies were too numerous to count (TNTC).

Sample Location: WWT SLUDGE

Field ID: 25139

Collection Date/Time: 7/12/1999 10:30 AM

Matrix: S-OTHER

Lab ID: 394251	Storet Code	Component	Result	Code	Units
Test: Chlorinated (phenoxy acid) herbicides in TCLP samples by HPLC/UV. (EPA 1311)					
Comments: 1) Sample could not be analyzed by HPLC/UV analysis due to very high matrix interference. 2) The same sample extract was further qualitatively analyzed by LC/MS and no positives found at the reported detection limits.					
	39730	2,4-D	2.0	U	ug/L
	39760	Silvex	2.0	U	ug/L

Lab ID: 394253	Storet Code	Component	Result	Code	Units
Test: TCLP for Semi-volatile organic pollutants by GC/MS. (EPA 625/ 8270 mod.)					
Comments: Insufficient sample to prepare sample matrix spikes.					
	39340	gamma-BHC	1.8	U	ug/L
	77151	m,p-Cresols	38		ug/L
	77152	o-Cresol	16		ug/L
	34571	1,4-Dichlorobenzene	1.2	U	ug/L
	34611	2,4-Dinitrotoluene	1.2	U	ug/L
	39390	Endrin	1.8	U	ug/L
	39700	Hexachlorobenzene	1.2	U	ug/L
	34391	Hexachlorobutadiene	3.5	U	ug/L
	34396	Hexachloroethane	3.5	U	ug/L
	34447	Nitrobenzene	2.4	U	ug/L
	39032	Pentachlorophenol	3.5	U	ug/L
	77687	2,4,5-Trichlorophenol	1.2	U	ug/L
	34621	2,4,6-Trichlorophenol	1.2	U	ug/L
		Pyridine	4.7	U	ug/L

Lab ID: 394255	Storet Code	Component	Result	Code	Units
Test: Mercury in TCLP samples using cold vapor AA spectroscopy. (EPA 245.1)					
		Mercury	0.0010	U	mg/L

Lab ID: 394257	Storet Code	Component	Result	Code	Units
Test: Organochlorine pesticides in TCLP samples by GC/ECD. (EPA 8080 mod.)					
Comments: MDL for Methoxychlor elevated due to matrix interference.					
		Chlordane	0.20	U	ug/L
		Endrin	0.050	U	ug/L
		Gamma-BHC	0.010	U	ug/L

Heptachlor	0.010	U	ug/L
Heptachlor Epoxide	0.020	U	ug/L
Methoxychlor	0.12	U	ug/L
Toxaphene	0.75	U	ug/L

Lab ID: 394327 Storet Code Component Result Code Units

Test: Metals, total recoverable, in TCLP samples using trace-ICP emission spectroscopy. (EPA 6010 mod.)

Comments:
The Ag PQL was outside the control limits.

Arsenic	0.040	U	mg/L
Barium	0.300	U	mg/L
Cadmium	0.0090	U	mg/L
Chromium	0.032	U	mg/L
Lead	0.050	U	mg/L
Selenium	0.035	U	mg/L
Silver	0.0080	U	mg/L

Lab ID: 394329 Storet Code Component Result Code Units

Test: Volatile organic pollutants in TCLP samples by GC/MS. (EPA 8260)

Comments:
Precision of 1,1-dichloroethane is outside routine statistical limits. The MDLs are elevated due to required dilution of the sample matrix.

Benzene	180		ug/L
Bromoform	25	U	ug/L
Carbon tetrachloride	10	U	ug/L
Chlorobenzene	10	U	ug/L
Chloroform	10	U	ug/L
Dibromochloromethane	10	U	ug/L
1,2-Dichlorobenzene	10	U	ug/L
1,3-Dichlorobenzene	10	U	ug/L
1,4-Dichlorobenzene	10	U	ug/L
1,1-Dichloroethane	10	U	ug/L
1,2-Dichloroethane	10	U	ug/L
1,1-Dichloroethene	10	U	ug/L
1,2-Dichloropropane	10	U	ug/L
Ethylbenzene	160		ug/L
Methylene chloride	25	U	ug/L
1,1,2,2-Tetrachloroethane	10	U	ug/L
Tetrachloroethene	14	I	ug/L
Toluene	1400		ug/L
1,1,1-Trichloroethane	10	U	ug/L
1,1,2-Trichloroethane	10	U	ug/L
Trichloroethene	97		ug/L
Vinyl chloride	25	U	ug/L
Xylenes (total)	880		ug/L

Sample Location: OES

Field ID: 25140

Collection Date/Time: 7/12/1999 11:00 AM

Matrix: S-OTHER

Lab ID: 394252	Storet Code	Component	Result	Code	Units
Test: Chlorinated (phenoxy acid) herbicides in TCLP samples by HPLC/UV. (EPA 1311)					
Comments: 1) Sample could not be analyzed by HPLC/UV analysis due to very high matrix interference. 2) The same sample extract was further qualitatively analyzed by LC/MS and no positives found at the reported detection limits.					
	39730	2,4-D	2.0	U	ug/L
	39760	Silvex	2.0	U	ug/L

Lab ID: 394254	Storet Code	Component	Result	Code	Units
Test: TCLP for Semi-volatile organic pollutants by GC/MS. (EPA 625/ 8270 mod.)					
Comments: Insufficient sample to prepare sample matrix spikes.					
	39340	gamma-BHC	1.9	U	ug/L
	77151	m,p-Cresols	620		ug/L
	77152	o-Cresol	31		ug/L
	34571	1,4-Dichlorobenzene	1.3	U	ug/L
	34611	2,4-Dinitrotoluene	1.3	U	ug/L
	39390	Endrin	1.9	U	ug/L
	39700	Hexachlorobenzene	1.3	U	ug/L
	34391	Hexachlorobutadiene	3.8	U	ug/L
	34396	Hexachloroethane	3.8	U	ug/L
	34447	Nitrobenzene	2.5	U	ug/L
	39032	Pentachlorophenol	3.8	U	ug/L
	77687	2,4,5-Trichlorophenol	1.3	U	ug/L
	34621	2,4,6-Trichlorophenol	1.3	U	ug/L
		Pyridine	5.0	U	ug/L

Lab ID: 394256	Storet Code	Component	Result	Code	Units
Test: Mercury in TCLP samples using cold vapor AA spectroscopy. (EPA 245.1)					
		Mercury	0.0010	U	mg/L

Lab ID: 394258	Storet Code	Component	Result	Code	Units
Test: Organochlorine pesticides in TCLP samples by GC/ECD. (EPA 8080 mod.)					
		Chlordane	0.20	U	ug/L
		Endrin	0.050	U	ug/L
		Gamma-BHC	0.010	U	ug/L
		Heptachlor	0.010	U	ug/L
		Heptachlor Epoxide	0.020	U	ug/L
		Methoxychlor	0.050	U	ug/L

Toxaphene	0.75	U	ug/L

Lab ID: 394328	Storet Code	Component	Result	Code	Units

Test: Metals, total recoverable, in TCLP samples using trace-ICP emission spectroscopy. (EPA 6010 mod.)

Comments:
The Ag PQL was outside the control limits.

Arsenic	0.040	U	mg/L
Barium	1.12		mg/L
Cadmium	0.0090	U	mg/L
Chromium	0.032	U	mg/L
Lead	0.050	U	mg/L
Selenium	0.038	I	mg/L
Silver	0.0080	U	mg/L

Lab ID: 394330	Storet Code	Component	Result	Code	Units

Test: Volatile organic pollutants in TCLP samples by GC/MS. (EPA 8260)

Comments:
Precision of 1,1-dichloroethane is outside routine statistical limits. The MDLs are elevated due to required dilution of the sample matrix.

Benzene	96		ug/L
Bromoform	25	U	ug/L
Carbon tetrachloride	10	U	ug/L
Chlorobenzene	10	U	ug/L
Chloroform	10	U	ug/L
Dibromochloromethane	10	U	ug/L
1,2-Dichlorobenzene	10	U	ug/L
1,3-Dichlorobenzene	10	U	ug/L
1,4-Dichlorobenzene	10	U	ug/L
1,1-Dichloroethane	10	U	ug/L
1,2-Dichloroethane	10	U	ug/L
1,1-Dichloroethene	10	U	ug/L
1,2-Dichloropropane	10	U	ug/L
Ethylbenzene	130		ug/L
Methylene chloride	25	U	ug/L
1,1,2,2-Tetrachloroethane	10	U	ug/L
Tetrachloroethene	10	U	ug/L
Toluene	810		ug/L
1,1,1-Trichloroethane	10	U	ug/L
1,1,2-Trichloroethane	10	U	ug/L
Trichloroethene	10	U	ug/L
Vinyl chloride	25	U	ug/L
Xylenes (total)	730		ug/L

Sample Location: TRIP BLANK

Field ID: 25141

Collection Date/Time: 7/12/1999 1:00 PM

Matrix: W-TRIP-BLK

Lab ID: 394331	Storet Code	Component	Result	Code	Units
Test: Mercury in aqueous samples using cold vapor AA spectroscopy. (EPA 245.2)					
	71900	Mercury	0.10	U	ug/L

Lab ID: 394332	Storet Code	Component	Result	Code	Units
Test: Metals, total recoverable, in aqueous samples using trace-ICP emission spectroscopy. (EPA 200.7 mod.)					
Comments: The Cr MDL was adjusted due to instrument background.					
	01002	Arsenic	3.0	U	ug/L
	01007	Barium	1.5	U	ug/L
	01027	Cadmium	0.30	U	ug/L
	01034	Chromium	2.0	U	ug/L
	01051	Lead	2.0	U	ug/L
	01147	Selenium	2.5	U	ug/L
	01077	Silver	0.50	U	ug/L

Quality Control Report

TLH-1999-07-13-36

Test	Analyte	LFB %Recovery		MS %Recovery		Precision %RPD	Precision %RSD
TCLP-AHERB							
	2,4-D	117	122			3.61	
	Silvex	113	113			0.426	

TLH-1999-07-13-37

Test	Analyte	LFB %Recovery		MS %Recovery		Precision %RPD	Precision %RSD
TCLP-BNA							
	1,4-Dichlorobenzene	65.1	65.6			0.826	
	2,4,5-Trichlorophenol	81.4	81.7			0.441	
	2,4,6-Trichlorophenol	84.6	85.0			0.401	
	2,4-Dinitrotoluene	84.4	87.6			3.70	
	Hexachlorobenzene	78.6	78.6			0.102	
	Hexachlorobutadiene	67.0	67.8			1.10	
	Hexachloroethane	61.8	61.9			0.194	
	Nitrobenzene	84.4	84.6			0.284	
	Pentachlorophenol	81.9	83.2			1.50	
	Pyridine	58.1	61.0			4.87	
	m,p-Cresols	66.9	67.2			0.552	
	o-Cresol	72.8	73.0			0.329	

TLH-1999-07-13-38

Test	Analyte	LFB %Recovery		MS %Recovery		Precision %RPD	Precision %RSD
TCLP-HG-H							
	Mercury	84.8		103	96.2	6.73	

TLH-1999-07-13-39

Test	Analyte	LFB %Recovery		MS %Recovery		Precision %RPD	Precision %RSD
TCLP-PS-CL							
	Endrin	105	96.4	99.6		8.93	
	Gamma-BHC	88.5	95.3	82.9		7.46	
	Heptachlor	103	93.0	109		9.86	
	Heptachlor Epoxide	102	96.0	88.2		6.50	
	Methoxychlor	85.8	92.9	88.5		7.90	

TLH-1999-07-13-41

Test	Analyte	LFB %Recovery		MS %Recovery		Precision %RPD	Precision %RSD
TCLP-TR							
	Arsenic	93.5		101	103	2.11	
	Barium	94.8		103	104	1.05	
	Cadmium	99.0		101	102	1.70	
	Chromium	96.6		100	101	1.30	
	Lead	94.2		101	103	1.19	
	Selenium	97.1		101	102	0.945	
	Silver	98.7		101	99.4	1.46	

TLH-1999-07-13-42

Test	Analyte	LFB %Recovery		MS %Recovery		Precision %RPD	Precision %RSD
TCLP-VOC							
	1,1,1-Trichloroethane	108	110	119	127	2.26	6.31
	1,1,2,2-Tetrachloroethane	106	110	108	111	2.62	4.24

1,1,2-Trichloroethane	100	102	104	109	1.60	5.50
1,1-Dichloroethane	70.4	97.3	115	121	32.0*	4.39
1,1-Dichloroethene	105	107	113	121	1.74	6.66
1,2-Dichlorobenzene	94.8	99.1	101	101	0.0394	4.41
1,2-Dichloroethane	105	108	108	109	0.774	2.07
1,2-Dichloropropane	96.9	99.5	103	112	2.69	8.36
1,3-Dichlorobenzene	95.6	99.8	102	99.8	2.40	4.30
1,4-Dichlorobenzene	95.1	96.9	98.9	100	1.11	1.83
Benzene	100	102	104	107	1.84	3.05
Bromoform	104	105	105	110	1.11	4.59
Carbon tetrachloride	105	108	118	123	3.03	3.87
Chlorobenzene	101	99.4	109	113	1.91	3.32
Chloroform	105	108	113	115	2.30	3.30
Dibromochloromethane	102	102	106	115	0.489	8.35
Ethylbenzene	106	109	116	122	2.56	5.67
Methylene chloride	119	119	118	127	0.0168	8.08
Tetrachloroethene	101	102	116	121	0.847	4.02
Toluene	101	101	107	113	0.495	5.34
Trichloroethene	100	99.1	111	116	0.964	4.82
Xylenes (total)	103	105	107	111	1.39	4.12

TLH-1999-07-13-43

Test	Analyte	LFB %Recovery	MS %Recovery	Precision %RPD	Precision %RSD
W-HG-H					
	Mercury	100	95.0	0.0	

TLH-1999-07-13-44

Test	Analyte	LFB %Recovery	MS %Recovery	Precision %RPD	Precision %RSD
W-ICP-TR					
	Arsenic	96.8	103 119	14.2	
	Barium	98.7	111 97.9	6.73	
	Cadmium	99.4	103 117	13.1	
	Chromium	99.5	104 118	4.97	
	Lead	96.5	101 115	13.0	
	Selenium	98.6	105 119	12.5	
	Silver	113	95.4 96.5	1.21	

* -- Item failed QC

Howco Environmental Services

Project: OTHER-WSM
Request ID: RQ-1999-07-05-21

Job ID: *TLH-1999-07-13-36* ***Job Status:*** *V*

Sample	St	Field ID	Sampling Location
394251	V	25139	WWT SLUDGE
S-ACIDHERB			
394252	V	25140	OES
S-ACIDHERB			

Job ID: *TLH-1999-07-13-37* ***Job Status:*** *V*

Sample	St	Field ID	Sampling Location
394253	V	25139	WWT SLUDGE
TCLP-BNA			
394254	V	25140	OES
TCLP-BNA			

Job ID: *TLH-1999-07-13-38* ***Job Status:*** *V*

Sample	St	Field ID	Sampling Location
394255	V	25139	WWT SLUDGE
TCLP-HG-H			
394256	V	25140	OES
TCLP-HG-H			

Job ID: *TLH-1999-07-13-39* ***Job Status:*** *V*

Sample	St	Field ID	Sampling Location
394257	V	25139	WWT SLUDGE
TCLP-PS-CL			
394258	V	25140	OES
TCLP-PS-CL			

Job ID: *TLH-1999-07-13-41* ***Job Status:*** *V*

Sample	St	Field ID	Sampling Location
394327	V	25139	WWT SLUDGE
TCLP-TR			
394328	V	25140	OES
TCLP-TR			

Job ID: *TLH-1999-07-13-42* ***Job Status:*** *V*

Sample	St	Field ID	Sampling Location
394329	V	25139	WWT SLUDGE
TCLP-VOC			
394330	V	25140	OES
TCLP-VOC			

Job ID: *TLH-1999-07-13-43* ***Job Status:*** *V*

Sample	St	Field ID	Sampling Location
394331	V	25141	TRIP BLANK
W-HG-H			

Job ID: *TLH-1999-07-13-44* ***Job Status:*** *V*

Sample	St	Field ID	Sampling Location
394332	V	25141	TRIP BLANK
W-ICP-TR			

Log-in Checklist

RQ ID: RQ-1999-07-05-21

Cooler Check

Cooler ID	Ice Present? Yes	Ice Present? No	If No, Temperature	Evidence Tape Present? Yes	Evidence Tape Present? No	Evidence Tape Intact? Yes	Evidence Tape Intact? No	Tracking Number
					✓			8112 5193 3767
Purple Rubbermaid	✓							

Note: If the the temperature of a cooler is above 6° C or an evidence seal is damaged then identify the bottles, in the affected cooler(s), on back of form.

Shipping Method: Fed Ex Date/Time of Receipt: 7/13/99 10:35

Acid Preserved Samples pH Checked: pH </=2 ? Yes___ No✓ NA___ HW

If No, fill out back of form.

Base Preserved Samples pH Checked: All OK? Yes___ No___ NA✓ HW

(W-CN, OV-CN - pH >/= 12), (W-SULFDE-F, W-SULFIDE - pH >/= 9)

If No, fill out back of form.

Evidence Tape on Bottles Present: Yes___ No✓

If Yes, is it intact? Yes___ No___

If not intact then fill out back of form.

Condition of Containers:

Loose Caps: Yes___ No✓

If Yes, fill out back of form.

Broken Containers: Yes✓ No___

If Yes, fill out back of form.

Chain Of Custody Form Included? Yes✓ No___ Field Sheet(s) Included? Yes✓ No___

If Yes verify receipt of all containers listed then sign custody form. Document discrepancies (i.e. missing containers) on COC form.

Event ID: SWD 1ST-1999-07-13-01

Coolers Unpacked/Checked by: Tom E Date: 7/13/99

Event Logged in by: HW

NA - Not Applicable (i.e. sediment samples)

Florida Department of Environmental Protection

Central Laboratory Sample Submittal Form

Event ID *

Request Number: RQ-1999-07-05-21

Howco Environmental Services

Customer: SW-DIST

Project ID: OTHER-WSM

PMAS:

Requester: Troy Eastman

Collected By: Randall H. Strauss

Field Parameters Measured By:

Field Report Prepared By:

Send Final Report To:

Lab ID *: 25139
Location: WWT Sludge
Field ID: 25139
Matrix (Include type e.g. Salt, Fresh, etc): Sludge
Temp (C):
pH:
Latitude: ° ' " .
Longitude: ° ' " .
☒ Comp ☐ Grab
Collection (begin) Date 7/12/99 Time 1030
Collection (end) Date 7/12/99 Time 1030
Tot Res Chlorine (mg/L):
Diss Oxygen (mg/L):
Storet Station Number:
Sample Depth ☐ m ☐ ft
☐ Salinity (PPTh) ☐ Sp Conductance (umho/cm)
NPDES Number:
Comments:
Bottle Group(s) **:

Lab ID *: 25140
Location: OES
Field ID: 25140
Matrix (Include type e.g. Salt, Fresh, etc): Sludge
Temp (C):
pH:
Latitude: ° ' " .
Longitude: ° ' " .
☒ Comp ☐ Grab
Collection (begin) Date 7/12/99 Time 1100
Collection (end) Date 7/12/99 Time 1100
Tot Res Chlorine (mg/L):
Diss Oxygen (mg/L):
Storet Station Number:
Sample Depth ☐ m ☐ ft
☐ Salinity (PPTh) ☐ Sp Conductance (umho/cm)
NPDES Number:
Comments:
Bottle Group(s) **:

Lab ID *: 25141
Location: Trip Blank
Field ID: 25141
Matrix (Include type e.g. Salt, Fresh, etc): Fresh Water.
Temp (C):
pH:
Latitude: ° ' " .
Longitude: ° ' " .
☐ Comp ☒ Grab
Collection (begin) Date 7/12/99 Time 1300
Collection (end) Date 7/12/99 Time 1300
Tot Res Chlorine (mg/L):
Diss Oxygen (mg/L):
Storet Station Number:
Sample Depth ☐ m ☐ ft
☐ Salinity (PPTh) ☐ Sp Conductance (umho/cm)
NPDES Number:
Comments:
Bottle Group(s) **:

Lab ID *:
Location:
Field ID:
Matrix (Include type e.g. Salt, Fresh, etc):
Temp (C):
pH:
Latitude: ° ' " .
Longitude: ° ' " .
☐ Comp ☐ Grab
Collection (begin) Date Time
Collection (end) Date Time
Tot Res Chlorine (mg/L):
Diss Oxygen (mg/L):
Storet Station Number:
Sample Depth ☐ m ☐ ft
☐ Salinity (PPTh) ☐ Sp Conductance (umho/cm)
NPDES Number:
Comments:
Bottle Group(s) **:

Relinquished By:	Date/Time	Received By:	Date/Time	Relinquished By:	Date/Time	Received By:	Date/Time
		Gena Harris	7/13/99 11:30				

* Shaded Areas for Lab use only.

** Please see reverse side for Bottle Group information.

last revised September 25,1998

STATE OF FLORIDA
DEPARTMENT OF ENVIRONMENTAL PROTECTION

CHAIN OF CUSTODY RECORD

Page 1 of 1

PROJECT NAME	SUBMITTING AGENCY NAME	SUBMITTING AGENCY CODE
Howco Environmental Services		

SAMPLER SIGNATURE(S): Randall A Stevens

RQ #: RQ-1999-07-05-21

MODULE #:

STATION/ LOCATION/ NUMBER	DATE M/D/Y	TIME ####	COMP/ GRAB	# of Containers	S- ACIDHERB	TCLP-BNA	TCLP-HG-M	TCLP-PS-CV	TCLP-TR	TCLP-VOC			Field ID #
WWT Sludge	7/12/99	1030	Comp.	3	X	X	X	X	X	X			25139
OES	7/12/99	1100	Comp	3	X	X	X	X	X	X			25140
Trip Blank	7/12/99	1300		1									25141

Sealed and Relinquished by:	Date/ Time	Method of Dispatch:	Opened and Accepted by:	Date/ Time
Randall A Stevens	7/12/99 14:30	Fed Ex	Tom. E 7/13/99	7/13/99 10:45

REMARKS:

* Metals, Volatiles, Acid B/N Extr., Pesticides, PCB's, Nutrients, Wet Chem, Toxicity, Algal Assay, Chlorophyll, etc.

Cool acking Worksheet For Request: RQ-1[illegible] J7-05-21
Howco Environmental Services
Ship Cooler On: 23-JUN-1999 Requester: Troy Eastman

Customer/Project: SW-DIST/OTHER-WSM

813-744-6100 SC 512-1042
FL Dept. of Environmental Protection
3804 Coconut Palm Drive
Tampa, FL 33619

Attn: Troy M. Eastman

Comments:
Two samples and one equipment blank are to be taken and analyzed for all TCLP parameters TMJ 6/29/99

#12, Blue

Requested Analyses:

Group: A # of Sites: 2

Container ID: GJ-1L Qty: 4 Preservation: ICE , Lot # 311410
Description: Glass Jar 1L

Analysis	Description
S-ACIDHERB	Chlorinated (phenoxy acid) herbicides in sediment matrices by HPLC/UV.
TCLP-BNA	TCLP for Semi-volatile organic pollutants by GC/MS.
TCLP-HG-H	Mercury in TCLP samples using cold vapor AA spectroscopy.
TCLP-PS-CL	Organochlorine pesticides in TCLP samples by GC/ECD.
TCLP-TR	Metals, total recoverable, in TCLP samples using trace-ICP emission spectroscopy.

Container ID: GJ-SEP-250 Qty: 4 Preservation: ICE , Lot # 300021
Description: 250 ml glass jar with a septa lid.

Analysis	Description
TCLP-VOC	Volatile organic pollutants in TCLP samples by GC/MS.

Group: B # of Sites: 1

Container ID: BG-1L Qty: 4 Preservation: ICE , Lot # 04261999O1
Description: Brown Glass Bottle 1L

Analysis	Description
W-BNA	Semi-volatile organic pollutants, excluding PCBs and Toxaphene, in water matrices by GC/MS.

Container ID: P-500ML Qty: 1 Preservation: HNO3 , Lot # 189416
Description: Plastic Bottle 500 mL

Analysis	Description
W-HG-H	Mercury in aqueous samples using cold vapor AA spectroscopy.
W-ICP-TR	Metals, total recoverable, in aqueous samples using trace-ICP emission spectroscopy.

Container ID: BG-1L Qty: 4 Preservation: ICE , Lot # 03161999O1
Description: Brown Glass Bottle 1L

Analysis	Description
W-PEST-CL	Organochlorine pesticides in water matrices by GC/ECD.

Container ID: 4-G-40ML 1 Preservation: ICE , Lo. 153713-UP
Description: Set of 4 40ml glass vials (in metal can) TB0518199901

Analysis	Description
W-VOC-MS	Volatile organic pollutants in water matrices by GC/MS.