



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

FACILITY INFORMATION:

Facility Name: HOWCO Environmental Services

On-Site Inspection Start Date: 03/09/2016

On-Site Inspection End Date: 03/09/2016

ME ID#: 1038

EPA ID#: FLD152764767

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

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

County Name: PINELLAS

Contact Phone: (727) 327-8467

NOTIFIED AS:

Used Oil Transporter

Used Oil Marketer

Used Oil Generator

Used Oil Processor

INSPECTION TYPE:

Routine Inspection for Used Oil Processor facility

Routine Inspection for Used Oil Marketer facility

Routine Inspection for Used Oil Transporter facility

Routine Inspection for Used Oil Generator facility

INSPECTION PARTICIPANTS:

Principal Inspector: Kelly M. Honey, Environmental Specialist III

Other Participants: Richard Dillen, Quality Assurance Officer; Lee A. Morris, Director - Operations; Greg Bradley, Operations Manager

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

SIC CODE: 2911 - Manufacturing - petroleum refining

TYPE OF OWNERSHIP: Private

Introduction:

HOWCO Environmental Services (HOWCO) was inspected by the Department of Environmental Protection (Department) to evaluate the facility's compliance with state and federal hazardous waste regulations. The inspector was accompanied throughout by Richard Dillen, HOWCO's Quality Assurance Officer, and Lee Morris, the Director of Operations. Greg Bradley, the Operations Manager, was present for the walkthrough portion of the inspection. The relevant paperwork was subsequently reviewed on 04-07-16 at the facility's main office on Central Avenue in St. Petersburg. The facility has been inspected numerous times by the Department's Hazardous Waste Section, most recently on 09-14-14. On 01-22-16, the Department issued HOWCO a single permit with two permit numbers authorizing operation of a used oil processing facility (#33721-HO-004) and a solid waste / materials processing facility (#33721-SO-005). The permit expires 08-03-20.

Process Description:

HOWCO stores, processes and markets used oil and is a registered used oil filter transporter and processor, as well. Additionally, HOWCO accepts oily waste solids from its customers for consolidation and subsequent disposal at a Class I landfill. No solid waste treatment or solidification is performed. Used anti-freeze is shipped monthly to On-Site Antifreeze Recycling, Ft. Meyers, FL. As a result of the lab wastes generated during QA testing, HOWCO is also a conditionally exempt small quantity generator of hazardous waste (CESQG). The facility is on City of St. Petersburg water and sewer systems. The processes at the facility have not changed since the previous inspection.

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The overall appearance of the yard was organized and maintained. HOWCO is permitted to have 48 aboveground storage tanks (ASTs), storing petroleum contact water (PCW), used oil, etc. The emergency address system (i.e., the bullhorn) was tested and found to be fully functional. The fire and emergency equipment are inspected monthly and tested annually, however, there was no indication on the fire extinguishers that they had been recertified since October 2014. Mr. Dillen said he was sure that the extinguishers were all recertified at the same time months ago. During the subsequent paperwork review, Mr. Dillen provided a copy of invoice #252362 from Abco Fire & Safety, Inc., that showed 6 fire extinguishers were certified at the facility on 08-19-15. It is unclear why the technician did not relabel the extinguishers at the time of the certification.

As indicated, the overall condition of the facility was good, but there was some peeling and flaking observed in several places on the floor of containment #1A. In accordance with 40 CFR 279.54(d), existing aboveground tanks used to store or process used oil at processing and re-refining facilities must be equipped with a secondary containment system, however, 40 CFR 279.54(d)(2) further states that the containment system, including walls and floor, must be sufficiently impervious to used oil to prevent any used oil released into the containment system from migrating out of the system to the soil, groundwater, or surface water.

At this time, containment #1A still appears to meet the federal requirements for secondary containment, but does not appear to fully meet the requirements of Florida's Aboveground Storage Tank Systems rule (Chapter 62-762, Florida Administrative Code). Please ensure that the containment is fully compliant with state requirements before HOWCO's next storage tanks compliance inspection by the Pinellas County Pollutant Storage Tank Program. Additionally, one of the valves for tank #125 looked wet, and there may be some possible seepage at the joints. HOWCO needs to evaluate this piece of equipment and repair as needed.

Stormwater and wastewater are collected throughout the facility, including from the containments, the processing areas, the truck wash, the drum washing area, and the yard. All collected wastewater is routed to the WTU via sumps and pumps. After treatment, the effluent is discharged via a Parshall flume to the sanitary sewer system under Industrial Pretreatment permit #SPFL-5622219-CIU-86-32.

HazMat and emergency response supplies are stored in one of three large trailers on the south side of the property. The contents of the HazMat trailer included personal protective equipment as well as spill response equipment. The inventory was checked and found to contain the required items. Since the previous inspection, additional equipment has been placed in the HazMat trailer making it a little cramped. The Department recommends cleaning out the trailer before it gets so crowded it can no longer meet the requirements of 40 CFR 279.52(a)(5), which requires unobstructed access to the facility in case of emergencies.

The filter crushing and drum crushing areas were extremely clean and well maintained. The used oil filter crusher is still on site, but filters are no longer crushed. Drums of used oil filters are received and staged in the filter processing area where they are consolidated in large bins. The full bins of uncrushed filters are shipped to US Foundry & Manufacturing Corp., Miami, FL. In addition to approximately 35 empty drums and one drum of trash, there were 76 drums of used oil filters stored in the filter processing area, plus another 20 staged near the drum crusher. All the drums were labeled "used oil filters" and protected from the weather. There were also several drums containing spent oil absorbent materials and some drums of soap.

At the time of the inspection, the solid waste pad had one roll-off of spent paper filter media to be shipped to the Pinellas County Waste-to-Energy incinerator. There were also five bins of used oil filters staged and awaiting shipment to US Foundry. The bins were all labeled appropriately and protected from the weather.

There were several gouges and scrapes observed in the solid waste pad. In addition, some of the joints were clearly visible. A coating is present on the concrete, but the coating appears worn, especially at some of the joints. Some areas, such as the gouges, do not have any coating left, and it is unknown whether the concrete is lined underneath. The Department recommends that HOWCO get the pad evaluated by a qualified engineer to determine whether it is still functioning as designed.

Oily solid waste received or generated at the facility is not being solidified at this time. The majority is now consolidated on site and sent to a landfill. Oily sludges (i.e., separator sludge) from customers are pressed to remove excess oil and water, which will then be processed with the rest of HOWCO's used oil. The remaining solids are sent to Clark Environmental, Inc., which is permitted to accept and treat such waste. HOWCO's oil-

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extracted sludge and WTU sludge are also managed by Clark Environmental, Mulberry, FL. The oil extracted sludge is dewatered first on site in a filter press before getting shipped, but the WTU sludge is not. The sludges are analyzed annually, most recently on 10-26-15, and have shown to be nonhazardous.

As previously stated, HOWCO is not presently solidifying solid waste, and processing is limited to the removal of free liquids from sludges received from customers before sending them on to Clark Environmental. Based on discussions with the Department's Permitting staff, including the SWD Solid Waste Permitting Manager and Bheem Kothur, the permitter in Tallahassee, this practice is allowable even though the solid waste is not going for energy recovery. During the next permit renewal, this portion of the permit should be re-evaluated with respect to current operations.

The facility's sludge storage and settling tanks are located in a concrete containment dike next to the solid waste pad. The tanks associated with the oily sludge (i.e., not the WTU sludge) are elevated at least 10 feet. For the most part the containment was clean, but there was a wet spot under the oil extraction sludge tank. Upon further examination, it was determined that the area was wet from oily water drips from the equipment overhead. Due to its height, the inspector could not determine if there was a small leak or if it was from condensation or rain water running down the tank. As discussed during the inspection, HOWCO needs to inspect the overhead piping, valves, etc., and ensure all components of these tank systems are free from leaks.

The Maintenance Shop is across 8th St. S. next to the lab and generates used oil filters, used oil, used antifreeze and oily waste. At the time of this inspection, the shop was closed up, so the interior was not inspected. Used oil and antifreeze containers are located outside the shop and are equipped with secondary containment and protected from the weather, however, there were two full drums of used oil outside the containment. HOWCO staff was directed to immediately relocate the drums to a contained area until the used oil could be processed. The Department also recommends providing staff in the Maintenance Shop with refresher training on used oil requirements for generators. Spent lead-acid batteries are returned to the vendor for core credit.

Behind the laboratory, there are two 55-gallon drums of used oil in secondary containment. The drums collect sample waste from the laboratory and are covered and labeled, but the containment had some stormwater collected inside. Mr. Morris instructed his staff to remove the water from the containment at the same time they relocated the two drums of used oil.

Processed oil is randomly sampled biweekly and tested to confirm it is on-spec. Analyses are done off site by PhosLab. Samples of processed oil are retained in the laboratory for thirty days. Hazardous COD testing waste is generated in the laboratory, and spent vials are accumulated in a box labeled "spent vials." Staff said fluorescent lamps are taken on CESQG days to the County collection center for disposal, which is also how laboratory wastes are disposed of.

Records were reviewed and found to be complete and up to date. HOWCO employees, including the designated emergency coordinators, received DOT HazMat Training and Hazardous Waste/Used Oil Management Training on 01-15-16. HOWCO has an electronic recordkeeping system that is used company wide. Selecting a customer's account gives access to all delivery, pick-ups, waste profiles documentation on file, including analyticals. Approximately ten accounts were randomly selected and the associated records examined, including manifests, profiles, analytical results, and certifications. Inbound and outbound paperwork was included. Currently, the only outgoing used oil is to customers, and before every load is delivered, the customer is provided with a certificate of analyses to support the claim that the material is on-spec. There are no deliveries from the St. Petersburg plant to HOWCO's other facilities, although the plant still receives used oil from other HOWCO sites.

HOWCO requires customers to analyze all new wastes picked up, requires the generator to certify at three years that there has been no change to the process, and requires a new analysis every five years. As part of its acceptance criteria, drivers must "sniff" all used oil for halogen content. If the instrument indicates the halogen content is >1,000-ppm, the used oil is analyzed using a Dexsil kit. If that also shows the oil has a high halogen content, it is not picked up, unless the presumption the material is hazardous is rebutted. All used oil arriving at the plant has been accepted in accordance with this criteria, and therefore there are no "rejected loads."

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Conclusion:

Based on the observations made during this inspection, HOWCO was found to be operating out of compliance rules applicable to used oil processors, but has since returned to compliance.

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Signed:

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

Kelly M. Honey

PRINCIPAL INSPECTOR NAME

Environmental Specialist III

PRINCIPAL INSPECTOR TITLE**PRINCIPAL INSPECTOR SIGNATURE**

FDEP

ORGANIZATION

05/06/2016

DATE

Greg Bradley

Representative NAME

Operations Manager

Representative TITLE

HOWCO Environmental Services

ORGANIZATION

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

Richard Dillen

Representative NAME

Quality Assurance Officer

Representative TITLE

HOWCO Environmental Services

ORGANIZATION

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Lee A. Morris

Representative NAME

Director - Operations

Representative TITLE

HOWCO Environmental Services

ORGANIZATION

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Report Approvers:**Approver:**

Richard M Vaughn

Inspection Approval Date:

05/09/2016