



September 6, 2012

Florida Department of Environmental Protection
Central District
3319 Maguire Boulevard, Suite 232
Orlando, Florida 32803-3767

Re: Lake County-HW
HOWCO Environmental Services- FLD101828689
Short Form Consent Order Letter

Danielle Owens,

This serves as HOWCO's response to the short form consent order received via email on 08/29/2012.

Howco acknowledges and understands the potential infractions and we have made the necessary steps to correct them. Furthermore, maintaining and remaining in compliance with the rules regulating our industry is critical and very important to our organization and reputation within the industry.

We welcome the FDEP to our facilities and look to the Department for guidance in compliance and not just an enforcement agency ready to fine you when you make a minor mistake. It is our understanding from other districts and Tallahassee that the current administration is not imposing monetary penalties for paperwork violations. Howco feels the civil penalties imposed in this consent order are for "paperwork violations" which pose no danger to human health or the environment. As noted in our prior correspondence, the information requested was available electronically.

Howco is requesting a redetermination from the department and kindly request the department retract the monetary penalties associated with the short form consent order.

Sincerely,

Lee A. Morris
Director – Operations
Howco Environmental Services