FACT SHEET
July 9, 2007

HOWCO Environmental Services
St. Petersburg, Florida
EPA I.D. No: FLD 152 764 767
Permit No: 33721-HO-001

Used Oil Processing and Waste Handling Facility Permit Renewal Final

1. This facility has a permit to operate a Used Oil Processing Facility consisting of drum storage area, storage area and processing area. The facility has 21 above ground storage tanks with sufficient capacity to store and process approximately 360,000 gallons of used oil.

2. The Permittee has complied with the closure cost estimate and financial assurance requirements of the new Rule dated June 9, 2005. Financial Assurance Mechanism and annual closure cost estimate adjustment conditions are added to this permit renewal.

3. The final permit contains minor edits and clarifications.

4. There are no issues with this permit.

Florida Department of Environmental Protection
Bob Martinez Center
2600 Blair Stone Road
Tallahassee, Florida 32399-2400

Charlie Crist
Governor

Jeff Kottkamp
Lt. Governor

Michael W. Sole
Secretary

PERMITTEE:
Hagan Holding Company
d/b/a Howco Environmental Services
3701 Central Avenue North
St. Petersburg, Florida 33713

Attention:
Mr. Arthur Timothy Hagan, President

I.D. Number: FLD 152 764 767
Permit Number: 33721-HO-001
Date of Issue: July 10, 2007
Date of Expiration: August 3, 2010
County: Pinellas County
Lat./Long: 27°45'47"N / 82°41'32"W
Project: Operation of a Used Oil and Waste Material Processing Facility

This permit renewal is issued under the provisions of Sections 403.707 and 403.769, Florida Statutes (F.S.), and Florida Administrative Code Chapters (F.A.C.) 62-4, 62-701, 62-710, 62-730, 62-740 and 40 Code of Federal Regulations (CFR) Part 279. The above named Permittee is hereby authorized to perform the work or operate the Facility shown on the application dated July 11, 2005 and as revised on January 9, 2006; and approved drawing(s), plans, and other documents attached hereto or on file with the Department and made a part hereof . The Used Oil and Waste Material Processing Facility ("Facility") is located on an approximately five acre parcel of land owned by Timco Real Estate, Inc., in Pinellas County at 843 43rd Street South, St. Petersburg, Florida. A diagram of the site layout is included as **Attachment A** of this permit. The Permittee is authorized to process and market used oil, oily wastewater, and petroleum contact water in the tanks and other ancillary equipment listed in **Attachment B** of this permit.

The Facility consists of 47 Aboveground Storage Tanks ("ASTs") inside secondary containment. This may be used to store or process used oil, petroleum contact water, oily wastewater and other non-hazardous wastewater. Presently, nine tanks are dedicated to used oil, one tank is dedicated to water/antifreeze, and one tank is dedicated to burner fuel; however, the contents of each tank may change from time-to-time based on market conditions, provided appropriate marking/placarding is provided in accordance with applicable law. The use and capacities of the ASTs and related appurtenances currently not in use at the Facility are listed in **Attachment B** of this permit.

OTHER ACTIVITIES

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

The following documents were used in preparation of this permit:

1. Permit Renewal Application dated July 11, 2005 and additional information submitted dated January 9, 2006 and December 1, 2006.

2. HOWCO Solid Waste Processing estimate document drafted in September 2006.

3. Used Oil Processing Facility Permit 92465-HO06-001, issued August 3, 2000.

This Renewal Permit replaces Permit #92465-HO06-001.

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GENERAL CONDITIONS (PURSUANT TO CHAPTER 62-4, F.A.C.):

1. The terms, conditions, requirements, limitations, and restrictions set forth in this permit are "permit conditions" and are binding and enforceable pursuant to Sections 403.141, 403.727, or 403.759, F.S. The Permittee is placed on notice that the Department will review this permit periodically and may initiate enforcement action for any violation of these conditions.

2. This permit is valid only for the specific processes and operations applied for and indicated in the approved drawings or exhibits. Any unauthorized deviation from the approved drawings, exhibits, specifications, or conditions of this permit may constitute grounds for revocation and enforcement action by the Department.

3. As provided in Subsections 403.087(6) and 403.722(5), F.S., the issuance of this permit does not convey any vested rights or any exclusive privileges. Neither does it authorize any injury to public or private property or any invasion of personal rights, nor infringement of federal, state or local laws or regulations. This permit is not a waiver of or approval of any other Department permit that may be required for other aspects of the total project which are not addressed in the permit.

4. This permit conveys no title to land or water, does not constitute State recognition or acknowledgment of title, and does not constitute authority for the use of submerged lands unless herein provided and the necessary title or leasehold interest has been obtained from the state. Only the Trustees of the Internal Improvement Trust Fund may express State opinion as to title.

5. This permit does not relieve the Permittee from liability for harm or injury to human health or welfare, animal, plant life or property caused by the construction or operation of this permitted source, or from penalties therefore; nor does it allow the Permittee to cause pollution in contravention of Florida Statutes and Department rules, unless specifically authorized by an order from the Department.

6. The Permittee shall properly operate and maintain the Facility and systems of treatment and control (and related appurtenances) that are installed and used by the Permittee to achieve compliance with the conditions of this permit, as required by Department rules. This provision includes the operation of backup or auxiliary facilities or similar systems when necessary to achieve compliance with the conditions of the permit and when required by Department rules.

7. The Permittee, by accepting this permit, specifically agrees to allow authorized Department personnel, upon presentation of credentials or other documents as may be required by law and at reasonable times, access to the premises where the permitted activity is located or conducted to:

   (a). Have access to and copy any records that must be kept under conditions of the permit;

   (b). Inspect the Facility, equipment, practices, or operations regulated or required under this permit; and

   (c). Sample or monitor any substances or parameters at any location reasonably necessary to assure compliance with this permit or with Department rules.

Reasonable time may depend on the nature of the concern being investigated.

8. If, for any reason, the Permittee does not comply with or will be unable to comply with any condition or limitation specified in this permit, the Permittee shall immediately provide the Department with the following information:

   (a). A description of and cause of non-compliance; and

   (b). The period of noncompliance, including dates and times; or, if not corrected, the anticipated time the noncompliance is expected to continue, and steps being taken to reduce, eliminate, and prevent recurrence of the noncompliance.

9. The Permittee shall be responsible for any and all damages, which may result and may be subject to enforcement action by the Department for penalties or revocation of this permit.

10. In accepting this permit, the Permittee understands and agrees that all records, notes, monitoring data and other information relating to the construction or operation of this permitted source which are submitted to the Department may be used by the Department as evidence in any enforcement case involving the permitted source arising under the Florida Statutes or Department rules, except where such use is proscribed by Sections 403.111 and 403.73, F.S.. Such evidence shall only be used to the extent it is consistent with the Florida Rules of Civil Procedure and appropriate evidentiary rules.

11. The Permittee agrees to comply with changes in Department rules and Florida Statutes after a reasonable time for compliance, provided, however, the Permittee does not waive any other rights granted by Florida Statutes or Department rules. A reasonable time for compliance with a new or amended surface water quality standard, other than those standards addressed in Rule 62-302.500, F.A.C., shall include a reasonable time to obtain or be denied a mixing zone for the new or amended standard.

12. This permit is transferable only upon Department approval in accordance with Rules 62-4.120 and 62-710.800, F.A.C., as applicable. The Permittee shall be liable for any noncompliance of the permitted activity until the transfer is approved by the Department.

13. This permit or a copy thereof shall be kept at the work site of the permitted activity.

14. This permit also constitutes:

   (a). Determination of Best Available Control Technology (BACT);

   (b). Determination of Prevention of Significant Deterioration (PSD);

   (c). Certification of compliance with state Water Quality Standards (Section 401, PL 92-500); and
   (d). Compliance with New Source Performance Standards.

15. The Permittee shall comply with the following:

(a). Upon request, the Permittee shall furnish all records and plans required under Department rules. During enforcement actions, the retention period for all records will be extended automatically unless otherwise stipulated by the Department;

(b). The Permittee shall hold at the Facility, or other location designated by this permit, records of all monitoring information (including all calibration and maintenance records and all original strip chart recordings for continuous monitoring instrumentation) required by this permit, copies of all reports required by this permit, and records of all data used to complete the application for this permit. These materials shall be retained at least three years from the date of the sample, measurement, report or application unless otherwise specified by Department rule; and

(c). Records of monitoring information shall include:

1. The date, exact places, and time of sampling or measurements;

2. The person responsible for performing the sampling or measurements;

3. The date(s) analyses were performed;

4. The person responsible for performing the analyses;

5. The analytical techniques or methods used; and

6. The results of such analyses.

16. When requested by the Department, the Permittee shall within a reasonable time furnish any information required by law that is needed to determine compliance with the permit. If the Permittee becomes aware that relevant facts were not submitted or were incorrect in the permit application or in any report to the Department, such facts or information shall be corrected promptly.

SPECIFIC CONDITIONS

PART I – STANDARD REQUIREMENTS

1. All documents submitted pursuant to the conditions of this permit shall be accompanied by a cover letter stating: the name and date of the document submitted; the EPA I.D. number of the Facility; the number(s) of the Specific Condition(s) affected; the permit number and project name of the permit involved. Submittals in response to these conditions shall be submitted as follows:

Copies of all documents must be submitted to FDEP in accordance with Rule 62-730.225(2)

(a). One hard and one electronic copy shall be sent to:

Environmental Administrator
Hazardous Waste Management Section
MS 4560
Bureau of Solid and Hazardous Waste

Florida Department of Environmental Protection
2600 Blair Stone Road,
Tallahassee, Florida 32399-2400

(b). One hard and one electronic copy shall be sent to:

Department of Environmental Protection
Hazardous Waste Section Manager
Southwest District
13051 North Telecom Parkway
Temple Terrace, Florida 33637

(c). The Permittee shall submit one copy of the cover letter for any application to renew and or/modify this permit along with the appropriate fee to:

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

The Permittee shall submit the full renewal/modification application as instructed in this Specific Condition

2. Before transferring ownership or operation of the Facility during its operating life, the Permittee must notify the new owner or operator in writing of the requirements of 40 CFR Part 279 and Rule 62-710, F.A.C. The Permittee shall also submit an application for transfer of this permit on DEP Form 62-1.201(1) accompanied with an appropriate application fee. This permit is transferable only upon Department approval in accordance with Rule 62-4.120, F.A.C. The Permittee shall be liable for any noncompliance with the permitted activity until the transfer is approved by the Department.

3. The Department may modify, revoke, reissue, or terminate for cause, this permit in accordance with the provisions of Section 403.087(7), F.S., and Rules 62-4.080, 62-4.100, or 62-710.800, F.A.C. The filing of a request for a permit modification, revocation and re-issuance, or termination, or the notification of planned changes or anticipated noncompliance on the part of the Permittee does not stay the applicability or enforceability of any permit condition. The Permittee may submit any subsequent revisions to the Department for approval. These revisions shall meet the requirements of F.A.C., Rules 62-4.050 and 62-710.800(6), and must be accompanied with an appropriate application fee.

4. Prior to 60 days before the expiration of this permit, the Permittee shall submit a complete application for renewal of the permit on DEP form 62-710.901(6) in accordance with Rules 62-710.800(4) and 62-4.090, F.A.C., and in a manner prescribed by the Department, unless the Facility is to be closed prior to the expiration date of this permit in accordance with the requirements of Rule 62-710.800(5), F.A.C.

5. The Permittee shall comply with all requirements of 40 CFR Part 279 and Chapters 62-4, 62-701, 62-710 and 62-740, F.A.C., and all other applicable requirements of Department Rules.

6. By acceptance of this permit, the Permittee certifies that he has read and understands the obligations imposed by the Specific and General Conditions contained herein, including the date of permit expiration and renewal deadlines. It is a violation of this permit to fail to comply with all conditions and deadlines.

7. The Permittee shall operate, modify, or close the Facility only pursuant to a permit issued by the Department in accordance with Chapter 62-710 F.A.C. The Permittee shall submit any substantial revisions in the permitted operation or design of the Facility to the Department for approval prior to implementation.

8. Before closing or making any substantial modifications to the Facility, the Permittee shall submit to the Department the Used Oil Processing Facility Permit Modification Request, pursuant to Rules 62-710.800(3) and 62-4.050(6) and (7), F.A.C.

   (a). Pursuant to Rules 62-710.800(3) and 62-4.050(6) and (7), F.A.C., a substantial modification means a modification that is reasonably expected to lead to substantially different environmental impacts that requires a detailed review. For purposes of this subsection, an increase in storage capacity of the Facility by 25% or 25,000 gallons, whichever is less, is considered a substantial modification. Permit application fee for a substantial permit modification is listed in 62-710.800(4), F.A.C.

   (b). Pursuant to Rules 62-4.050(4) and 62-710.800(3), F.A.C., a minor modification means a modification that does not require substantial technical evaluation by the Department, may not require a new site inspection by the Department, and will not lead to substantially different environmental impacts or will lessen the impacts of the original permit. For purposes of this subsection, replacement of existing tanks with new tanks is considered a minor modification.

   (c). Pursuant to Rule 62-710.800(3), F.A.C., changes at the Facility which involve routine maintenance, such as repair of equipment, replacement of equipment with similar equipment, aesthetic changes, or minor operational changes are not considered modifications, do not have to be reported to the Department, and require no permit fee. The Permittee should contact the Department if there are questions as to whether a change would be considered routine maintenance.

9. All requests for permit modifications shall be certified by the owner and operator and signed, sealed, and certified by a Professional Engineer registered in the State of Florida, in accordance with Chapter 471, F.S. All submittals incorporating interpretation of geological data shall be signed and sealed by a Professional Geologist registered in the State of Florida in accordance with Chapter 492, F.S.

10. The Permittee shall submit a revised "Part I" of the Application Form for a Used Oil Processing Facility Permit to the Department within 30 days of any changes in the information stated in Part I.

11. All Facility operations personnel involved in used oil or PCW activities must successfully complete the training program identified in the Training Plan (Attachment 9) of the permit application dated July 11, 2005 as revised on January 9, 2006, once every 12 months. The training plan must be reviewed and updated by Facility personnel at least annually. Verification of this training must be kept with the personnel training records and maintained on-site or at the Permittee's corporate headquarters in St. Petersburg.

12. Except as permitted under Rule 62-701.320(15), personnel involved in solid waste activities shall not work unsupervised until training has been completed.

13. The Permittee shall maintain an updated list of personnel handling used oil and their respective job titles at the site or at the Permittee's corporate headquarters in St. Petersburg.

14. The Permittee must comply with General Facility Standards pursuant to 40 CFR 279.52 and Rule 62-710.300(1)(e), F.A.C., as follows:

(a). Maintenance and operation of the Facility: The Facility must be maintained and operated to minimize the possibility of a fire, explosion, or any unplanned sudden or non-sudden release of oily waste, oily wastewater, PCW, used oil, sludges, residues, or constituents to air, soil, or surface water which could threaten human health or the environment. [40 CFR 279.52(a)(1)]

(b). Required equipment [40 CFR 279.52(a)(2)]: The Permittee shall equip and maintain the Facility with the following:

1. An internal communications or alarm system capable of providing immediate emergency instruction (voice or signal) to Facility personnel as described in Attachment 6 of the permit application dated July 11, 2005 as revised on January 9, 2006;

2. A device, such as a telephone (at the on-site Facility operations office) or a hand-held two-way radio, capable of summoning emergency assistance from local police departments, fire departments, or State or local emergency response teams as described in Attachment 6 of the permit application dated July 11, 2005 as revised on January 9, 2006;

3. Portable fire extinguishers and associated equipment as described and depicted in Attachment 6 and Appendix 1 (drawing D-4-1) of the permit application dated, July 11,2005, and as revised on January 9, 2006; and

4. Water at volume and pressure as supplied by Pinellas County Utilities.

(c). Testing and maintenance of equipment: All Facility communications or alarm systems, fire protection equipment, spill control equipment, and decontamination equipment must be tested and maintained as necessary to assure its proper operation in time of emergency. [40 CFR 279.52(a)(3)]

(d). Access to communications or alarm systems: Whenever used oil is being poured, mixed, spread, or otherwise handled, all personnel involved in the operation must have immediate access to an internal alarm or emergency communication device, either directly or through visual or voice contact with another employee. If there is ever just one employee on the

premises while the Facility is operating, the employee must have immediate access to a device capable of summoning external emergency assistance. [40 CFR 279.52(a)(4)]

(e). Required aisle space: The Permittee must maintain aisle space sufficient to inspect drums and read labels.

(f). Arrangements with local authorities: The Permittee shall maintain arrangements with local authorities, listed in Attachment 6 of the permit application dated July 11, 2005 as revised on January 9, 2006 to familiarize police, fire departments, local hospitals, and emergency response teams with the layout of the Facility, properties of used oil handled at the Facility and associated hazards, places where Facility personnel would normally be working, entrances to roads inside the Facility and possible evacuation routes. [40 CFR 279.52(a)(6)]

15. The Permittee shall comply with the "Specific Spill Containment Procedures" of Attachment 6 of the permit application dated July 11, 2005 as revised on January 9, 2006. In the event of a spill or other emergency:

(a). The Permittee shall immediately carry out the provisions of the "Contingency Plan", Attachment 6, of the permit application dated July 11, 2005 as revised on January 9, 2006 and follow the emergency procedures described by 40 CFR 279.52 (b) (6), whenever there is a fire, explosion, or release of used oil, oily waste, oily wastewater, PCW, residues, sludges or constituents which threatens or could threaten human health or the environment. The Permittee shall give proper notification if an emergency situation arises, and within 15 days must submit to the Department a written report which includes all the information required in 40 CFR 279.52 (b) (6);

(b). Within seven days of meeting any criteria listed in 40 CFR 279.52 (b) (4), the Permittee shall notify the Department of its intent to revise the plan and provide an estimated schedule. Any other changes to the plan must be submitted to the Department within seven days of the change in the plan. All amended plans must be distributed to the appropriate agencies;

(c). When the contingency plan is implemented, the Permittee shall call the Department of Environmental Protection's 24 hour emergency telephone number which is (850) 413-9911 or (800) 320-0519 or, during normal business hours, the DEP Southwest District Office may be contacted at (813) 632-7600; and

(d). A copy of the contingency plan and all revisions to the plan must be maintained at the Facility. [40 CFR 279.52(b)(3)]

16. The Permittee may claim confidential any information required to be submitted by this permit in accordance with Section 403.111 and 403.73, F.S.

17. The conditions in this permit shall take precedence over the permit application documents where there are differences between these documents and the permit conditions.

18. This permit does not authorize the Permittee to accept or store any hazardous waste at this Facility. In the event that Permittee receives a shipment that is refused due to failure to meet pre-screening requirements, the Permittee must completely comply in a timely manner with the

provision of Attachment 3 of the permit application dated July11, 2005, in order not be subject to permitting or regulation as a hazardous waste storage, treatment or disposal facility.

PART II – USED OIL PROCESSING REQUIREMENTS

1. The Permittee, pursuant to 40 CFR 279.55, shall follow the procedures described in Attachment 2 of the permit application dated July 11, 2005 as revised on January 9, 2006 and the following:

   (a). The Permittee shall sample and analyze each incoming shipment for the parameters listed in Attachment 3 of the permit application dated July 11, 2005 as revised on January 9, 2006; and

   (b). Any incoming containers of used oil which fail the analysis required by this condition shall be rejected by the Facility (unless exempt under applicable law). The Permittee shall maintain documentation in the Facility operating record of any shipment of used oil not exempt under applicable law and suspected to be mixed with hazardous waste and shall manage such waste in accordance with the provisions of Paragraph 18 of Part I, above.

   Prior to shipment off-site, the Permittee shall sample and analyze one tank (i.e. batch) of processed used oil once every two weeks for the constituents/properties of concern. The analysis shall be for the parameters listed in Attachment 3 of the permit application dated July 11, 2005 as revised on January 9, 2006 to determine whether the used oil is on-specification or off-specification. This condition is not required if the outgoing shipment is sold to another used oil processor who will make the on or off specification determination.

2. Pursuant to 40 CFR 279.56 (Tracking) and Rule 62-710.510(1), F.A.C., the Permittee must comply with the following tracking requirements.

   (a). Acceptance: The Permittee shall keep a record of each used oil shipment accepted for processing/re-refining. These records may take the form of a log, invoice, manifest, bill of lading or other shipping documents or electronic media. Records for each shipment must include the following information:

      (1). The name, address and EPA identification number (if applicable) of the transporter who delivered the used oil to the processor/re-refiner, oil-burner or disposal Facility;

      (2). The name, address and EPA identification number (if applicable) of the generator or processor/re-refinery from whom the used oil was received for processing/re-refining; and

      (3). The quantities of used oil accepted and date of acceptance.

   (b). Delivery: The Permittee shall keep a record of each shipment of used oil that is shipped to a used oil burner, processor/re-refiner, or disposal facility. These records may take the form of a log, invoice, manifest, bill of lading or other shipping documents or electronic media. Records for each shipment must include the following information:

(1). The name, address and EPA identification number (if applicable) of the transporter delivering the used oil to the receiving facility;

(2). The name, address and EPA identification number (if applicable) of the oil-burner, processor/re-refinery or disposal facility receiving the shipment;

(3). The quantities of used oil shipped and date of shipment; and

(4). The laboratory analytical number.

(c). Rejected shipments: The Permittee shall maintain documentation of any shipment of used oil that is refused due to failure to meet pre-screening requirements set forth in Attachment 3 of the permit application dated July 11, 2005.

3. The Permittee, pursuant to 40 CFR 279.57, must keep a written or electronic operating record for the current year at the Facility. Previous years' records can be kept either at the Facility or at the Permittee's corporate headquarters in St. Petersburg, and maintained for three years or until closure of the Facility (whichever comes first). The records shall include the following information:

(a). Records and results of used oil analyses performed as described in the analysis plan in Attachment 3 of the permit application dated July 11, 2005 as revised on January 9, 2006 and as required under 40 CFR 279.55;

(b). Summary reports and details of all incidents that require implementation of the contingency plan as specified in 40 CFR 279.52(b); and

(c). All records required by Condition 2 of this Part.

4. The Permittee shall maintain as part of the operating record of the Facility the inspection records and release detection monitoring records required in Rule 62-761.710, F.A.C., for aboveground storage tanks, integral piping, and process tanks. Reports' of releases greater than 25 gallons to pervious surfaces (i.e. outside containment) shall include the amount, time of the release, time of the response and a description of the response. The Permittee shall inform the Department of any release in accordance with applicable law.

5. Pursuant to Rule 62-710.300(3), F.A.C., used oil storage and process tanks must meet the requirements of 40 C.F.R. Part 279.54 and Chapter 62-762, F.A.C., Above Ground Storage Tank Systems, as applicable.

6. The Permittee shall manage residues generated from the storage and processing of used oil in accordance with 40 CFR 279.10 (e) and Attachment 4 of the permit application dated July 11, 2005 as revised on January 9, 2006. The Permittee shall analyze outgoing sludge/residues annually.

7. The Permittee shall maintain, in good standing, the financial assurance mechanisms established to demonstrate proof of financial assurance. Support documentation and required adjustments shall be submitted within the time frames specified in Rule 62-701.630, F.A.C. as adopted by reference

in Rule 62-710.800(6), F.A.C. All submittals in response to this specific condition shall be sent to:

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

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

8. The Permittee shall annually register its used oil handling activities with the Department on DEP Form 62-710.901(1) by March 1 of each year and shall display the validated registration form and identification number in a prominent place at the Facility location [Rule 62-710.500(4), F.A.C.].

9. No later than March 1 of each year, the Permittee shall submit an annual report covering used oil processing Facility activities conducted during the previous calendar year to the Department on DEP Form 62-710.901(3) in accordance with Rule 62-710.510(5), F.A.C. The report shall summarize the records kept pursuant to Rule 62-710.510, F.A.C. The records described in this paragraph shall include:

(a). The EPA identification number, name, and address of the processor or re-refiner;

(b). The calendar year covered by the report; and

(c). The quantities of used oil accepted for processing/re-refining and the manner in which the used oil is processed/re-refined, including the specific processes employed.

PART III – WASTE PROCESSING ACTIVITIES

1. The Permittee may accept petroleum contaminated non-hazardous solid wastes including without limitation those generated from petroleum contaminated soils, sludges, debris, Personal Protection Equipment (PPE) or other petroleum non-hazardous waste streams. Such wastes not containing removable used oil can be sent to the Facility for bulking and/or sent directly to a permitted Solid Waste Disposal facility. Permittee shall bulk and/or process such waste for acceptance at permitted solid waste disposal or processing facilities.

(a). Permittee shall receive all wastes delivered to the Facility for solidification and processing in drums, roll-offs, and/or vacuum trucks. All drums and roll-offs will be temporarily stored on the solid waste pad. Vacuum truck waste will be off-loaded into treatment tank #111 or cone bottom tank #110. Further processing shall be in accordance with Attachment 4.

(b). Permittee shall analyze all waste in accordance with the Analysis Plan in Attachment 3 of the permit application dated July 11, 2005 as revised on January 9, 2006. Only non-hazardous waste may be processed. Waste that is characterized as being hazardous shall be properly transported to a facility permitted to accept hazardous waste, in accordance with the provisions of Paragraph 18 of Part I.

(c). The amount of waste at the Facility shall not exceed 120 tons of solids in drums and roll off containers, plus 22,000 gallons of liquids in drums (not including used oil filters in drums and containers).

(d). Permittee shall perform Solid Waste Processing as follows:

(1). A maximum of 20% (40,000 gallons) of the solid waste accepted at the facility annually can be disposed of with little or no processing to a permitted solid waste landfill. Solid waste qualifying for this disposal option includes petroleum contaminated soils, petroleum contaminated debris, and drums of grease and asphaltic material.

(2). A maximum of 80% (200,000 gallons) of solid waste accepted at the facility annually must be processed for oil reclamation and water recovery. The solids remaining following processing must go for energy recovery.

(3). Waste water treatment sludges generated at the facility will not be counted towards the facility annual solid waste accepted total. It is a solid waste generated at the facility.

PART IV – PETROLEUM CONTACT WATER PROCESSING REQUIREMENTS

1. The Permittee shall ship or accept petroleum contact water (PCW) only by using a transporter who is a registered hazardous waste transporter in compliance with Rule 62-730.170, F.A.C., or who has received a DEP/EPA ID number by notifying the Department on EPA Form 8700-12 of its intent to transport PCW. [62-740.200(2), F.A.C.]

2. The Permittee shall store PCW only in those containers or tanks which are made of or lined with materials which will not react with and are otherwise compatible with the waste to be stored. PCW received into the Facility may be commingled and stored in Facility tanks with other petroleum- or used oil-contaminated water for processing and recovery in accordance with Attachment 2 of the permit application.

3. If a container holding PCW is not in good condition (e.g. rusting, bulging) or begins to leak, the Permittee shall either over pack the container or transfer the waste to another container or tank which is in good condition. [40 CFR 279.22]

4. The Permittee shall store PCW in tanks registered under the requirements of Rule 62-761, F.A.C. or in containers or tanks that do not require registration but meet the requirements of Rule 62-740.100(2), F.A.C. [62-740.300(2)(a) and (b), F.A.C.]

5. The Permittee shall test and manage all waste residuals in accordance with the requirements of specific condition 6 of Part II.

6. The Permittee shall maintain the following records for a minimum of three years. [62-740.300(2)(c), F.A.C.]

   (a). For each shipment of PCW received:

      1. Name and address of the PCW producer;

      2. Name and address of the PCW transporter;

      3. Date of receipt of the PCW shipment;

      4. Volume of PCW received;

      5. A copy of the shipping paper used for shipment of the PCW; and

      6. Have on file written assurances from the producer that the PCW does not contain levels of hazardous constituents above those found in the source of the PCW. [62-740.300(4), F.A.C.]

   (b). Records to demonstrate that, under normal operating practices, the Facility recovers product from PCW as described in Attachment 2 of the permit application dated July 11, 2005 and as revised on January 9, 2006. [62-740.300(3), F.A.C.]

7. The Permittee shall submit an annual report covering petroleum contact water (PCW) activities for the previous year by March 1 of each year. The report shall include:

   (a). The total quantity of PCW received during the previous calendar year; and

   (b). An estimate of the total quantity of product recovered from the PCW as described in Attachment 2 to the permit application dated July 11, 2005 and as revised on January 9, 2006 and pursuant to 62-740.300(5), F.A.C.

PART V – TANKS AND CONTAINERS

"Tank system", for the purpose of Part V of this permit, is defined as the storage tank(s), appurtenant equipment and secondary containment structures comprising the Permittee's Facility.

1. The Permittee shall prevent the release of PCW, used oil, oily waste or oily wastewater, residues, sludges and constituents to the environment. The secondary containment system shall be maintained in accordance with the permit application and shall comply with the requirements of 40 CFR 279.54, including the requirements set forth below:

   (a). All new components shall have secondary containment as required by 40 CFR 279.54 and Rule 62-761, F.A.C. prior to being put into service; and

   (b). The secondary containment system shall meet the requirements of 40 CFR 279.54 and Rule 62-761, F.A.C.

2. The Permittee shall, in the event of a release:

   (a). Stop the release;

   (b). Contain the release;

   (c). Clean up and manage properly the released waste and other materials; and

   (d). If necessary, repair or replace any leaking storage containers or tanks prior to returning them to service. [40 CFR 279.54(g)]

3. The Permittee shall, as part of the general operating requirements:

   (a). Not place PCW, used oil, other wastes, or treatment reagents in a tank system if the possibility exists that this may cause the tank system to fail;

   (b). Use appropriate controls and practices to prevent spills and overflows;

   (c). Follow the Operating Procedures described in Attachment 2 of the permit application dated July 11, 2005 as revised on January 9, 2006; and

   (d). Comply with the requirements of 40 CFR 279.54(g) if a leak or spill occurs.

4. The Permittee shall label or mark all above ground tanks and containers used to store or process used oil, with the words "Used Oil". [40 CFR 279.54(f)]

5. The Permittee shall store used oil only in those containers or tanks which are made of or lined with materials which will not react with and are otherwise compatible with the waste to be stored.

6. If a container holding used oil is not in good condition (e.g. rusting, bulging) or begins to leak, the Permittee shall either over-pack the container or transfer the waste to another container or tank which is in good condition. [40 CFR 279.22]

7. The Permittee shall inspect all regulated tank systems in accordance with procedures presented in Attachment 7 of the permit application dated July 11, 2005 as revised on January 9, 2006.

8. Spilled or leaked waste must be removed from the secondary containment areas within three days of discovery [Rule 62-761.820(1)(d), F.A.C.]. Accumulated precipitation must be removed from the secondary containment areas within one week after a rainfall event [Rule 62-761.700(3)(a), F.A.C.]. Removed materials shall be managed in accordance with Attachment 2 of the permit application dated July 11, 2005 as revised on January 9, 2006.

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

PART VI – CLOSURE REQUIREMENTS

1. The Permittee shall close the Facility in compliance with 40 CFR 279.54(h), 62-710.800(5), F.A.C. and the closure plan found in Attachment 8 of the application dated July 11, 2005 as revised on January 9, 2006.

2. The Permittee shall maintain an approved written closure plan and it must demonstrate how the Facility will be closed in accordance with Attachment 8 of the permit application dated July 11, 2005 as revised on January 9, 2006.

   (a). The closure plan, as described in Attachment 8, "Closure Plan" of the application dated July 11, 2005 as revised on January 9, 2006, and associated cost estimates shall be updated whenever significant operational changes occur or design changes are made.

   (b). The closure plan shall be maintained with records required under Rule 62-710.510, F.A.C.

   (c). The Permittee shall submit an updated and detailed closure plan to the Department at least 60 days prior to the scheduled date of closing the Facility.

   (d). Within 30 days after closing the Facility, the Permittee shall submit a certification of closure completion to the Department that demonstrates that the Facility was closed in substantial compliance with the approved closure plan.

3. Within 90 days of determining that the Facility cannot be clean closed under this permit, the Permittee shall submit a permit application to close the tank system(s) and perform postclosure care in accordance with Chapter 62-770, F.A.C.

4. Containers: Permittees who store used oil in containers must, pursuant to closure requirements of 40 CFR 279.54(h), comply with the following requirements:

   (a). At closure, containers holding used oils or residues of used oil must be removed from the site; and

   (b). The Permittee must remove or decontaminate used oil residues, contaminated containment system components, contaminated soils, and structures or equipment contaminated with used oil, and manage them as hazardous waste unless the materials are not hazardous waste as defined in 40 CFR 261 or determined, pursuant to 40 CFR 261.11.

5. Solid Waste: All solid waste will be removed from the site and recycled or disposed in accordance with the requirements of Chapter 62-701.710(6).

6. At closure, containers, drums, and disposal quantities are as identified in HOWCO's letter dated December 1, 2006 and DEP approval letter dated December 22, 2006.

Hagan Holding Company
Howco Environmental Services
3701 Central Avenue North
St. Petersburg, Florida 33713

I.D. Number: FLD 152 764 767
Permit Number: 33721-HO-001
Date of Expiration: August 3, 2010

Issued July 10, 2007
STATE OF FLORIDA DEPARTMENT
OF ENVIRONMENTAL PROTECTION

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

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

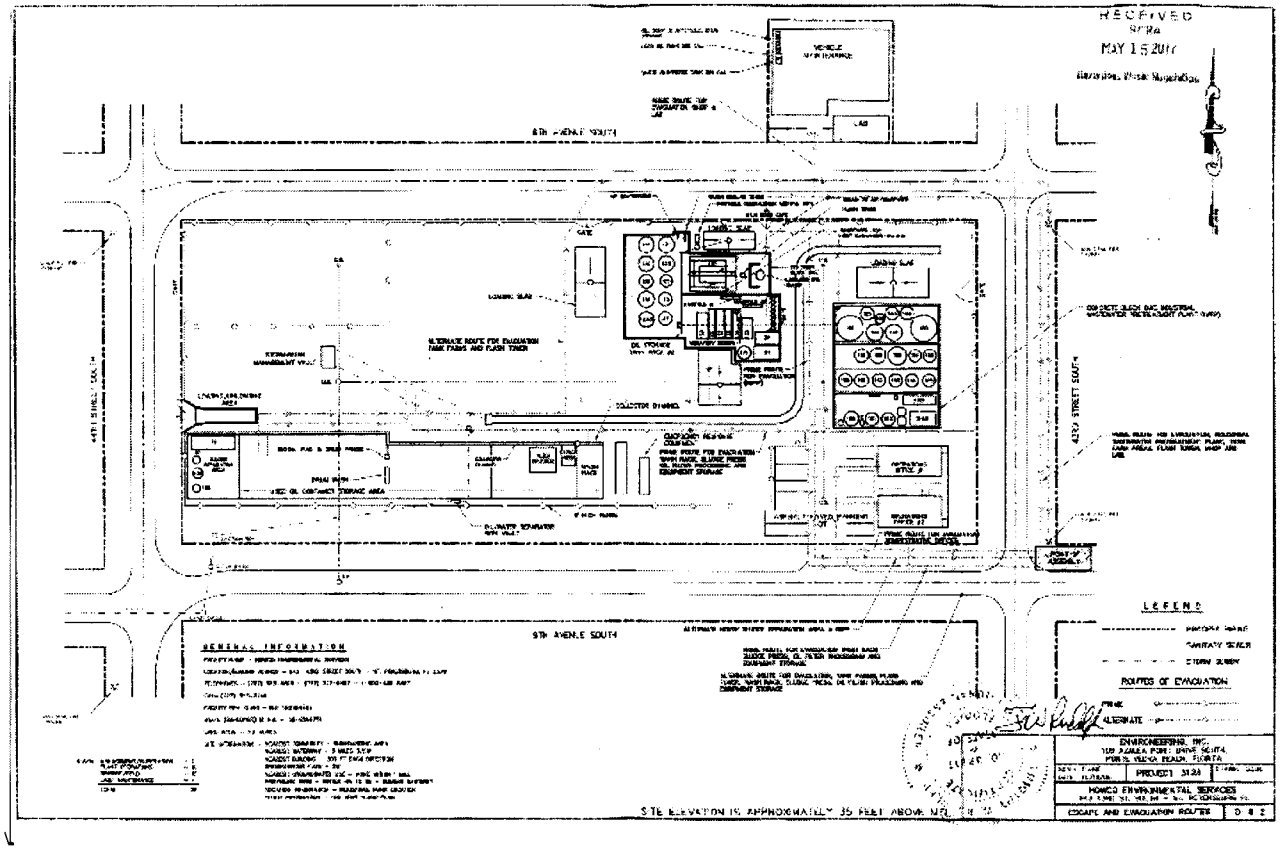
DEPUTY CLERK

July 9, 2007
DATE

ATTACHMENT A – SITE LAYOUTS

Hagan Holding Company
Howco Environmental Services
3701 Central Avenue North
St. Petersburg, Florida 33713

I.D. Number: FLD 152 764 767
Permit Number: 33721-HO-001
Date of Expiration: August 3, 2010



ATTACHMENT B – TANK TABLES

Table 1
Processing Tanks - Containment #1

Tank Number	Capacity (gallons)	Product
100	30300	Used oil treatment
101	28800	Used oil treatment
130	7950	Oil receiving
131	3950	Oil receiving
132	3950	Oil receiving
133	3950	Oil receiving
134	3950	Screened oil
135	5000	Light ends, condensate
136	10000	Light ends
137	10570	Burner fuel oil
170	11150	Used oil, water soluble oil, antifreeze or wastewater
120	19550	Unprocessed oil
121	28900	Processed oil
122	29730	Processed oil
123	29730	Processed oil
124	29730	Processed oil
125	19210	Processed oil
126	20820	Processed oil
127	19470	Processed oil
128R1	19470	Receiving oil
129	23460	Processed oil

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

Containment area 4 has no tanks, and is used for the storage of Solid Waste

Containment area 2 and 3 are used for water treatment only

Table 2
Sludge Separation Area – Containment #5

Tank Number	Capacity (gallons)	Product
108	9980	IWPP Sludge
109	3225	Oil filter crusher
110	6415	Cone bottom
111	19380	Oily solids batch treatment

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ATTACHMENT 1

DESCRIPTION OF FACILITY OPERATIONS

HOWCO is a wholly owned subsidiary of Hagan Holding Company, a Florida based company, located at 843 43rd Street South, St. Petersburg, FL 33711, hereinafter referred to as "HOWCO." HOWCO also has offices located at 3701 Central Avenue, St. Petersburg, Florida for corporate, management, administrative and accounting staff. HOWCO is staffed with multi-disciplined, well-qualified employees dedicated to improving the environment. The company offers nearly 30 years of environmental and recycling experience in the areas of used oil reclamation, industrial waste processing and emergency spill response.

The process and production facility is comprised of 3.2 acres of land situated on 28 lots and three vacated utility easements with the following boundaries: North 8th Avenue South, East 43rd Street South, South 9th Avenue South, and West 44th Street South, St. Petersburg, Florida. There are approximately 30 process and production employees.

OIL RECOVERY

HOWCO may operate 24 hours per day, 7 days a week performing the following operations:

- Oil recycling from used oil collected at various locations and transported to the facility
- Pretreatment of industrial wastewater and emergency spill recovery waters, which is conducted in the industrial wastewater pretreatment plant and not a part of this application. Solids removed from this operation are processed in a sludge press.
- Processing a variety of oily solid wastes generated at the plant. The processing of used oil from industrial cleaning of oil tanks, oil water separators and other waste streams generating oily solids.
- Compacting and/or consolidation of used oil and oil filters with the intention of recovering oil and preparing metal for recycling as scrap metal.

HOWCO operates a laboratory capable of performing liquid testing required to classify various wastes from the oil recovery process and industrial wastewater pretreatment plant.

The collected used oil is recovered and processed. The following are the major feedstock sources:

- Any oil as defined by FAC Regulations and EPA Regulations
- Virgin Petroleum Products

SOLIDS

The solids processed are generated from the following;

- Internally generated wastewater treatment and oil processing sludge
- Generator oil/water separators
- Tank cleaning

- Containment area cleaning
- Sump cleaning
- Impoundment cleaning
- Absorbent Materials (ABS)
- Grease (automotive and lubricating)

The solid waste handling and processing areas consist of three parts:

- Oily solids batch treatment/cone bottom tank
- Solids press
- Container storage area

Solidification agents may be added to enhance the process.

Internally generated solids are processed and may be dewatered by the use of a sludge press.

Processed solids are shipped off-site to facilities that are permitted as thermal treatment facilities or Class I landfills by the FDEP. Copies of the permits for the facilities are kept on file in the administrative offices.

Containers are utilized for collection, shipment and storage of used oil filters. Used oil filters are compacted and/or consolidated and the oil is recovered. The filters are shipped to a permitted facility for disposal or metal recycling in accordance with FAC requirements.

ATTACHMENT 2
DETAILED PROCESS DESCRIPTION

The facility receives, processes and recycles non-hazardous used oils, industrial wastewater, oily water, petroleum contact water (PCW),oily solids, industrial solids, petroleum contaminated solids, used oil filters.

Collection Process

Company owned vehicles collect the above materials from customers/generators. The used oil is initially screened by the driver at pick-up using a halogen leak detector, and, if necessary, tested for total halogens using EPA Method 9077. A completed copy of the non-hazardous waste manifest is provided to the generator and the other copy accompanies the shipment.

Receiving Shipments

When the vehicle arrives at the facility, it is directed to the unloading area. The incoming shipment is logged and is ready for testing.

Used oil testing

A sample is collected from each shipment of used oil received at the facility. The used oil samples are delivered to the laboratory for testing prior to unloading. The oil is tested for total halogens. These tests are performed in the on-site laboratory and stored for one week. The results from the tests will be documented on the Plant Receiving Report. The Plant Receiving Reports are maintained for three years.

Used oil unloading

Once acceptance testing is completed, the operator/driver transfer the used oil to the appropriate tank. Should an incoming shipment of used oil initially not meet acceptance criteria for total halogens, and can not be successfully rebutted the oil is transferred to a designated trailer for temporary storage, awaiting additional analysis using EPA Method 8021 or 8260. If the analytical results do not meet the used oil specifications or cannot successfully be rebutted, the oil is shipped to a permitted facility.

Used Oil Processing

Used oil processing is performed utilizing a distillation and/or a chemical separation process.

1. Distillation and/or Chemical Separation Process

Oil is processed utilizing the following equipment:

Tank # 100 & 101
Heat exchanger
Vibrating mesh screen
Thermal oil heater
Storage tanks
Various pumps, piping, valves, strainers and filter

Oils are pumped into tanks 100 or 101 for thermal and/or chemical treatment. A demulsification chemical may be injected and mixed into the oil. The oil is heated in one of two heat-exchanging tanks (100 or 101). The treated oil is then allowed to cool to facilitate the water separation process or heated sufficiently to thermally remove the water. The vapors are condensed utilizing an air-to-stream condenser. The gas released as a result of the separation of water from oil are captured and piped to an air to stream condenser where the gas is re-condensed. The condensate flows into a storage tank. The condensate further cools and separation of water from light ends is accomplished through stratification of liquids in the condensate holding tank. The operator distinguishes light ends from water by color and pumps the condensate from either the bottom or top of the condensate holding tank. The water is pumped to untreated water storage tanks waiting pre-treatment. The light ends are blended into processed oil tanks during batch processing.

The processed oil is pumped from the heat exchange tanks (100 or 101) through the heat exchanger for further cooling. The cooled oil then passes through vibrating screens for solids filtration and removal. The oil is then pumped into batch storage tanks for product certification.

Oil Storage Tanks
Refer to Tables 1, 2, & 3.

Removal and disposal of oily solids from used oil process
Solids are generated from two sources in the process; the vibrating screen and bottom sediment in the various tanks. The solids removed during Used Oil Distillation and/or Chemical Separation will be managed through the solids processing area. Oily solids will be tested annually for waste determination requirements.

Used oil reprocessing
In the event that a batch of processed used oil does not meet the definition of on-specification, the batch will be reprocessed and tested until it meets the on-specification requirements and a notation shall be made on appropriate HOWCO records that the batch has been reprocessed.

Processed oil shipment and identification
The operator loads a trailer with on specification processed oil. Upon completion, the operator tags the trailer for the driver's identification. The operator includes on the identification the customer name, date and storage tank number. The driver's packet contains a manifest to be prepared which includes the customer name, address, date, volume and product name and a meter ticket showing the amount of oil loaded on the trailer.

Used oil transportation
Shipments of on specification processed used oil are transported to the customer on tank trailers. Upon arrival, the driver unloads the oil on-site into the customer's storage tank.

Waste Antifreeze

HOWCO routinely collects waste antifreeze from customers. Antifreeze will be accumulated in tanks and shipped off-site for reclamation to a recycling facility. Used oil that is in the antifreeze waste stream is removed by oil water separation.

Records of incoming and outgoing volumes will be documented and maintained at the corporate office for a period of three (3) years.

Used Oil Filters

Containers are utilized for collection, shipment and storage of used oil filters. Used oil filters, upon receipt at the facility, are placed on a coated concrete pad for storage prior to processing. Used oil filters are compacted and/or consolidated and the oil is recovered. The filters are shipped to a permitted facility for disposal or metal recycling.

Table 1
Processing Tanks - Containment #1A

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

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

Table 2
Processing Tanks - Containment 1B

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

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

Containment area 2 has no tanks, and is used for sludge drying only.

Containment areas 3 and 4 are used for water treatment only.

Table 3
Sludge Separation Area – Containment #5

Tank Number	Capacity (gallons)	Product
108	9980	IWPP Sludge
109	3225	Oil filter crusher
110	6415	Cone bottom
111	19380	Oily solids batch treatment

ATTACHMENT 3
ANALYSIS PLAN

USED OIL

Used oil, oily wastes and solid waste will be sampled and analyzed by the methods and at the frequency as outlined in the plan.

1. Sampling
Each incoming shipment of used oil received at the facility will be sampled using a bailer or caliwasa. The bailer and/or caliwasa will be inserted to the bottom of the vehicle and pulling it out to obtain representative core sample. Core samples from multi-compartmental trucks will be combined to obtain one sample to be tested. The samples from trucks will be marked with the truck number, date and operator identification number.

2. Testing
The sample will be tested in accordance with FAC 62-710 for total halogens utilizing the following procedure;

A. A halogen leak detector
B. If the detector indicates potential high halogen content the EPA method 9077 or 9075 will be utilized.

The Permittee, pursuant to 40 CFR 279.55, shall follow the following procedures:

(a) The Permittee shall sample and test each incoming shipment for total halogens. If the total halogen content is 999 ppm or less, the load will be accepted into the plant.

(b) If the test results indicate a total halogen content greater than or equal to 1000 ppm, separate samples will be obtained from each compartment. The separate samples will be tested in an attempt to isolate the compartment with excessive levels of total halogens. The test results will be stapled and documented on the receiving report for that vehicle.

Used oil is not received into the plant when the total halogens are greater than 999 ppm or unless total halogens are less than 4000 ppm and one of the following conditions are satisfied;

1. Household hazardous waste exemption, 40 CFR 261.4 (b)
2. CESQG exemption, 40 CFR 279.10 (b) (3)
3. Rebuttable presumption, EPA Method SW-846 / 8021B.

In the event that it is not possible to identify the source of the halogen content, then the oil will be isolated. This will be accomplished by either leaving the oil in the transport vehicle

or transferring the used oil to a tank trailer and keeping the tank trailer isolated until the disposition of the material can be determined.

Records of incoming shipments of used oil information will be kept at the Corporate Office for a minimum of three years.

CERTIFICATION OF PROCESSED OIL

Product knowledge and sample analyses are used to determine if the processed oil meets the on-specification criteria.

Outgoing shipments of processed oil shall meet the parameters listed in the classification of on-specification used oil as listed in 40 CFR 279.11. This condition is not required if the outgoing shipment is sold to another used oil processor who will make the on or off specification determination.

A representative sample of each batch of processed oil will be collected after the tank has been aerated for a period of time to be determined by plant operations personel. The sample is marked with the batch number, tank number and date. The sample is analyzed for:

- Halogen content (sniffer, followed by EPA Method 9077 or 9075 if positive)
- API gravity
- Water content
- Flash Point

To confirm Generator Product Knowledge, once a month a sample will be collected from one of the ten processed oil tanks and sent off to an independent laboratory for analysis of the constituents listed in 40 CFR 279.11 and Polychlorinated Biphenyls (PCB's). A split sample of the one sent for analysis will be retained for thirty days. Protocol for obtaining the sample will be in accordance with "Samplers and Sampling Procedures for Hazardous Waste" referenced in SW 846. The tank will be secured and no additional oil will be added to invalidate the analysis until the results are known. The results of the analysis will be entered into the company computer system and maintained for three years. The analysis will be reviewed monthly to assure conformance with on specification used oil limits set forth in CFR 40 Part 279.

INCOMING OILY SOLID WASTES

One of the following methods will be utilized for acceptance criteria for receiving non-hazardous solids;

1. Submittal of a non-hazardous analytical determination from a certified laboratory.

2. Forwarding a sample of the material to HOWCO for a laboratory determination as non-hazardous waste. The sample must be accompanied by a Waste Profile Sheet, noting that the material is not a hazardous waste, as defined in 40 CFR Part 261.

3. Submittal of a signed Waste Material Profile Sheet utilizing generator's process knowledge.
4. Submitting a Waste Material Profile Sheet and MSDS on virgin materials only.

Only one of the aforementioned alternatives is necessary to make a non-hazardous waste determination. Once the determination has been made regarding the acceptance of the material, a manifest number identifying the waste and the generator will be assigned. The waste approval will be valid and acceptable for a period of five years. Copies of the documents are kept on file for a minimum of five years.

The generator will recertify that there has been no change in the waste or the process producing the waste every year. After five years, the waste will be resampled and analyzed or generator knowledge will be used to recertify the approval in accordance with the Howco Waste Analysis Plan.

ATTACHMENT 4
SOLID WASTE HANDLING

HOWCO recovers and processes a variety of non-hazardous and petroleum contaminated solids, sludges, absorbents and residues.

Removal of oily solids from used oil processing

The oily solids discussed in this section are generated by HOWCO.

Oily solids are removed from used oil at the vibrating mesh screen, tanker trucks and tanks. The oily solids may be placed in drums, roll-off containers, or other containers for storage.

- Mesh screen
  Solids are removed from processed oil by a vibrating mesh screen and collected in drums. When a drum is full the solids are removed via vacuum truck. Once separated, the oily solids are mixed with a solidification agent. The solids are loaded into roll off trucks for transportation to a permitted landfill or thermal remediation facility for disposal.
- Storage tanks – oily solids removed from storage tanks are pumped and/or vacuumed into a treatment tank, sludge box, vacuum box or drums for solids solidification.
- Wastewater treatment sludge is removed from several tanks and may be processed/dewatered through an on-site filter press. The solids are then placed in a roll-off container and mixed with other dry solids or a solidification agent may be added.

A representative sample will be taken annually by a plant technician or chemist. Each sample will be collected in an 8 ounce jar using a scoop. The properly preserved sample will be sent to an outside lab to be analyzed for constituents as stated in Table _____ page _____. This analysis will be used to provide the base information for "Generator Product Knowledge".

Non-hazardous and Petroleum Contaminated Solids From Customers

The company receives a variety of petroleum contaminated solids from customer sources. The petroleum contaminated solids may contain a recoverable amount of oil, however; some solids that are received may be of a consistency that would preclude or be unfeasible to recover any quantifiable amount of oil. Non- hazardous and petroleum contaminated solids consist of absorbents, petroleum contaminated soils and oily sludges. These solids will be received in vacuum trucks and drums and may be pumped into a treatment tank, sludge box, vacuum box for oil reclamation and/or solids processing. Solidification may also be done in these containers.

Receiving and Processing of Oily Solids

Oily solids arriving in drums will be offloaded on a coated concrete pad prior to processing. The solids from the drums may be bulked in roll-off containers or dump trailer where oil and oily liquids may be removed for recycling or further processing. Solidification agents may be added to these containers prior to off-site shipment to a permitted thermal unit or landfill.

Oily solids arriving in vacuum trucks or other type bulk shipments will be offloaded into other containers or Oily Solids Batch Treatment Tank, 111 or the Cone Bottom Tank, 110. Tanks 110 and 111 will be utilized to remove and recover oils and oily waters for processing. The remaining solids from this process will be gravity fed into a roll-off container or dump trailer for further processing and then shipped off-site to a permitted thermal unit or landfill. Solidification agents may be added to these containers prior to shipment.

A waste determination in accordance with 40 CFR Part 262.11 will be made once a year on the oily solids removed from the Oily Solids Batch Treatment Tank, 111 or the Cone Bottom Tank, 110.

Solids entering the facility in containers from customers will be recertified annually to attest to the lack of change in consistency and characteristics of the waste and that no process changes have occurred.

ATTACHMENT 5

TRACKING PLAN

Product Collection

When the oil product, antifreeze, oil filters, or contaminated water is collected at the generator's facility, a copy of a non-hazardous waste manifest is provided to the generator. The non-hazardous manifest includes the generator's name, address, EPA ID number (if applicable), the quantity of used oil product or other oil related wastes accepted, and date of acceptance, and the EPA ID number of the transporter. A copy is kept at the Corporate Office or an offsite storage facility for a minimum of three years. The driver will also note on the manifest that the used oil was tested for halogens prior to collection.

Incoming Shipments

Upon arrival at the facility, the used oil and other oil related wastes are accompanied by non-hazardous waste manifests as described above. Date, volume, truck #, halogen determination, and driver's name is recorded on the Plant Receiving Report.

Outgoing shipments

A manifest/shipping document is completed for outgoing shipments. The document will contain the name, address, and EPA ID number of the transporter. The date, volume, driver's name and the destination of the shipment will also be provided.

ATTACHMENT 6

EMERGENCY PREPAREDNESS, PREVENTION & CONTINGENCY PLAN

Table of Contents

1.0 INTRODUCTION

1.1 Purpose

The goal of this emergency plan is to minimize hazards to human health and the environment from fires, explosions, or any unplanned sudden or non-sudden releases to soil, or surface water. The provisions of this plan will be carried out whenever there is a fire, explosion, or release of oil, which could threaten human health or the environment. A copy of this plan and any revisions will be maintained at the facility and submitted to local police, fire department and hospital, that might be called upon to provide emergency services. Postal receipts verifying delivery of the plans will be kept by Howco. In the event a local agency refuses to acknowledge the plan, Howco will notify the Department.

1.2 Areas of Concern:

- Transportation of recyclable materials to storage and unloading areas
- Transportation and unloading of used oil
- Tank storage area
- Solid waste handling and solidification – bulk and drums

1.3 Responsibilities

The Primary Incident Coordinator (PIC) must be familiar with this Plan, operations and activities at the facility, including the location and characteristics of used oil, the location of records, and the facility layout. The PIC or his/her designee is responsible for modifying this plan, as needed, to reflect changes in facility operations and/or county, state, or federal regulations. The PIC is responsible for ensuring that Howco employees are familiar with the content of this plan and are able to implement it, if needed and responsible for ensuring that this plan is posted and accessible to Howco employees. The PIC is responsible for implementing the plan in the event of an emergency and/or accidental release of material/waste. In the absence of the PIC, the Secondary Incident Coordinator (SIC) will be responsible for implementation.

After each emergency, this plan shall be reviewed and revised as necessary in the event of the plan's failure, the lack of pertinent information within the plan or any other identified problem associated with the plan.

2.0 GENERAL INFORMATION

Facility Name: HOWCO
Location: 843 43rd Street South, St. Petersburg, Florida 33711
Telephone No.: (727) 327-8467

Facility Activities: The facility is a used oil processing facility that can operate 24 hours per day, 7 days per week. Used oil, oil filters, antifreeze and petroleum contaminated water are collected from various clients. The materials are delivered to the facility and tested. Based on the test results, the materials are transferred into holding tanks, processed, and then shipped to suppliers and/or disposal/recycling facilities.

3.0 SPILL PREVENTION and EMERGENCY PREPAREDNESS

Prevention of spills is accomplished through careful handling of used oil and used oily materials and products, frequent inspection of transport and storage systems and strict adherence to safety procedures during material transfers. The operations are reviewed in terms of existing procedures and spill potential

General Spill Prevention Measures

- Employees handling containers are responsible for inspecting damaged containers and seals during handling, reporting any damages found and removing damaged containers from further use.
- Employees must properly stack the drums and other containers

Material Transport and Transfer

- Drivers are responsible for the guarding against overfilling tanks and containers.
- Pumps must be attended while in operation.
- Pumps, pipes, hoses, gaskets, and connections are inspected for wear by the responsible supervisor.
- Waste is to be placed in appropriate approved containers.

Prevention and Protective Measures

- Proper and safe work behavior practices
- Provision and use of proper equipment and facilities
- Continual assessment of potential hazards
- Provision and use of proper Personal Protective Equipment (PPE)
- Effective training
- Communication

Emergency Equipment Available (see site plan for locations)

Training

Training is the responsibility of the Department Manager (DM). The DM will ensure that personnel receive training commensurate with their designated duties and responsibilities. Standard Operating Procedures (SOP) and regulatory requirements will be the basis for training and will vary depending on the job description of the employee.

- Operations Personnel
  - Emergency Response Procedures
  - PPE use
  - Containment procedures
  - Record keeping and reporting policies
  - Operating & Inspection procedures
  - Loading and unloading procedures
  - Acceptance and processing procedures

Spill Abatement Activities

- Incidental Spill – The spill from any tank pump or leaking pipe or hose will be contained by the existing containment and controlled without causing any damage to the environment.
- Major Spill – The spill from the containment in the plant area will flow in a direction away from the plant, toward the retention basin. In such a case, immediate action will be taken to reinforce damaged parts of the containment areas and to minimize further release. Remediation and clean-up will begin as soon as feasible.

The Plant Manager and/or the PIC are responsible to order necessary steps for implementation of these instructions using the following guidelines:

- Do not risk human life or health in an attempt to control a spill
- Shut off pumps and close all lines serving a leaking container or tank
- Shut off electricity to the affected area, if necessary
- Mobilize emergency response personnel
  - Normal working hours – the plan will be activated by use of an electronic loudspeaker
  - Off-shift hours – control team personnel will be notified by telephone or pager
- Contain the spill as close to its source as possible
- Assemble required clean-up equipment and order clean-up
- In addition to the PIC, operating personnel will, under the direction of the PIC, position the absorbent materials in strategic points to contain the spill as needed.
- Response team members will operate pumps and man hoses to further contain and capture the spill
- Team members will perform other assigned tasks needed as directed by the PIC

4.0 EMERGENCY COORDINATOR (PIC) INFORMATION

Duties of the Emergency Coordinator or Designee

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

The following identifies the primary and alternate emergency coordinators:

Recycling Facility Primary Emergency Coordinator (Primary PIC)
Juan Rollier
Cell Phone # 727-543-5429

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

Recycling Facility Secondary Emergency Coordinator (Secondary PIC)
Tim Morris
Cell Phone # 727-385-1510
Or
Tim Hagan
Cell Phone # 727-804-4446

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

5.0 ARRANGEMENTS WITH LOCAL AUTHORITIES

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

revisions to this plan are made, a revised copy will be submitted to the referenced agencies. In the event any unplanned, sudden or non-sudden release of oil to the environment, the provisions of this plan must be carried out by the PIC. The PIC will determine if the emergency requires assistance from Federal, State or Local agencies. If agency assistance is needed, the PIC or Designee/First Responder shall notify the agency with the following information:

1. Time and type of emergency
2. Location
3. Name and quantity of material(s) involvement
4. Type of service needed
5. The possible hazards to human health or the environment

The following items will be completed by the PIC:

1. Provide a site layout, description of oil properties and associated hazards (MSDS), and appropriate emergency and evacuation plans
2. Consult with emergency response teams to determine if agreements between the primary and supporting personnel are necessary
3. Document all agreements/refusals

The following agencies are requested to the provide assistance as described below:

6.0 EMERGENCY PROCEDURES

6.1 Identifying Releases and Hazards

Whenever there is a release, fire, or explosion, the PIC or First Responder will immediately dial 911. The PIC or First Responder will then attempt identify the character, exact source, amount, and a real extent of any released material/waste. The PIC or First Responder will do this by observation or review of facility records/manifests and, if necessary by chemical analyses.

Concurrently, the PIC or First Responder will assess possible hazards to human health and the environment that may result from a release, fire, or explosion. The assessment will consider both direct and indirect effects of a release, fire, or explosion such as possible toxic gases, or the effect of any hazardous surface water runoff from water or fire depressing agents used to control the situation.

6.2 Notifications and Reporting

In the event of an imminent or actual emergency, the PIC or First Responder will immediately dial 911. The facility communication system includes a telephone, cellular phones, and an electronic loudspeaker. 40 CFR Table 302.3 will be consulted when any hazardous materials are

spilled. If the hazard material that was released meets or exceeds the Reportable Quantity (RQ), the agencies below will be notified immediately:

1) Florida Department of Environmental Protection via (813) 632-7600 (within 24 hours)
2) State Warning Point via (800) 413-9911 or (850) 320-0519 (within 24 Hours)

Notification of additional local authorities listed in Appendix B may be conducted, as deemed necessary by the PIC or First Responder .

If the PIC or First Responder determines that the facility has had a release, fire, or explosion, which could threaten human health or the environment outside the facility boundaries, the PIC or First Responder will report the findings as follows:

1) If the PIC or First Responder's assessment indicates that evacuation of the local area may be advisable, the PIC or First Responder will immediately notify the local authorities identified above. Additional assistance from local authorities listed in Appendix B may be obtained, as deemed necessary by the PIC or First Responder. The PIC or First Responder will be available to assist local authorities in deciding whether evacuation of the immediate area is needed.

2) The PIC or First Responder will report the following information:

a) Name and telephone number;
b) Name and address of facility;
c) Time and type of incident;
d) Name and quantity of material involved, to the extent known;
e) The possible hazards to human health and the environment.

6.3 Emergency Procedures

During an emergency, the PIC or First Responder will take all reasonable measures necessary to ensure that fires, explosions, and releases do not occur, reoccur, or spread to other hazardous material/waste at the facility. These measures may include stopping operation, collecting and containing released material, and removing or isolating containers. If the facility stops operating, the PIC or First Responder will monitor for leaks, pressure build-up, or breaches in valves, pipes, containment, etc.

After an emergency, the PIC or First Responder will provide for treatment, storage and disposal of recovered material/waste including contaminated soil, water, or other material. The treatment, storage, disposal of recoverable material/waste will be conducted in accordance with applicable county, state, and federal regulations. Waste management companies utilized in the treatment, storage, and disposal of recovered material will be chosen at the PIC or First Responder's discretion. The PIC or First Responder will ensure that, in the affected area(s) of the facility, no material/waste is incompatible with the released material/waste until cleanup procedures are completed. All emergency equipment listed in this plan (Appendix B) will be cleaned, if necessary, and fit for its intended use before operations are resumed.

Emergency Communication System

There are several telephones located within the office and laboratory areas. Pagers and cellular phones are issued to the PIC and operating personnel. Visual and voice warnings will be used to notify on-site personnel of an emergency during working hours. During non-working hours, telephones and pagers are used to contact the PIC and members of the Emergency Response Team.

Fire Control Systems

- Dry chemical fire extinguishers in the tank farm area
- Dry chemical fire extinguishers in the garage area
- Dry chemical fire extinguishers in the laboratory area
- Dry chemical fire extinguisher in the main office area

Site Control Systems

- All oil storage areas are surrounded with containment systems
- Oil containment and cleanup materials include:
    - Oil dry
    - Dike plugs
    - Booms and absorbent pads
    - Aggregate material for containment
- Decontamination equipment includes:
    - Surfactant and water
    - Brushes, buckets and mops

Maintenance and Testing

1. Site and fire control equipment will be inspected quarterly
2. Fire extinguishers will be inspected annually.

Equipment Handling Procedures

1. Containers and equipment will be stored such that sufficient aisle spacing is maintained to facilitate emergency response equipment
2. Facility operations personnel will have access to communication devices.

Removal of Oil/Water from Containment

To remove oil or water from the containment, the following steps will be followed:

1. Accumulated water is inspected for the presence of a sheen.
2. If a sheen is present, the water is considered to be contaminated and will be transferred into a storage tank.

3. The water is not considered contaminated; it may be discharged to grade.
4. The following records must be maintained for each discharge event:
    a. Date
    b. Time
    c. Estimated quantity of accumulation
    d. Presence or absence of petroleum or sheen
    e. Person removing the accumulation

Off-site Emergency Response Procedures - during transport

1. Driver assesses the situation
2. Driver will contact the PIC using the telephone numbers provided in this plan
3. If the emergency warrants an immediate response by outside agencies, the driver will contact the appropriate agency using the telephone numbers provided in this plan.
4. Driver will set up absorbent material in front of any sewer drains and/or grassy areas to prevent oil from spreading to those areas
5. Driver will remedy the release utilizing the spill containment procedures defined in this plan.
6. Driver will document the incident as noted in this plan.

7.0 DECONTAMINATION

Equipment used in the emergency response action will be decontaminated with an appropriate compatible cleaning solution before the articles leave the work area. Oil contaminated equipment should be cleaned using a surfactant and water solution. Refer to the manufacturers equipment guide for further details.

The PIC is responsible for assuring that the above-mentioned decontamination procedures are performed. Damaged tanks, pipes, drums, etc. will be repaired or replaced with equivalent equipment that meet or exceed the original design specifications, when applicable.

8.0 REPORTING

If this plan has been enacted, the PIC will submit a written report to the applicable Federal, State and Local agencies within 15 days of the incident. The report shall contain the following information:

1. Name, address, and telephone number of the owner/operator
2. Name, address, and telephone number of the facility
3. Date, time and type of incident
4. Name and quantity of material(s) involved
5. The extent of injuries, if any
6. An assessment of actual or potential harem to human health or the environment
7. Estimated quantity and disposition of the recovered material from the incident

The PIC will notify the Department when the facility has returned to compliance and prior to resuming operations.

ATTACHMENT 7
UNIT MANAGEMENT DESCRIPTION

Drums

The drums will be handled and unloaded in a dedicated drum area. The area is constructed of reinforced concrete. Proper aisle space will be maintained for containers. There will space between pallets drums rows with the minimum clearance of two feet between rows. HOWCO will inspect the drums on a weekly basis and inspection logs will be completed and maintained on-site.

Piping

Piping systems consist of steel pipes with welded joints. Most tanks are connected by three and two-inch piping. Used oil storage tanks are connected by three-inch carbon steel, iron or PVC pipes.

Storage Tanks

Above ground storage tanks were installed at the time of purchase of the facility. Therefore, it is not possible to certify that they meet the requirements of Rules 62-762.510 and 762.520.

Storage tanks, process tanks and process equipment are periodically inspected in accordance with Rule 62-762.600. The inspection records maintained on-site. Tanks are labeled according to their contents.

Removal of oil/water from containment

1. Accumulated water is inspected for the presence of a sheen or petroleum odor.
2. If a sheen or odor is present, the water is considered to be contaminated with petroleum and will be transferred to a used oil storage tank.
3. The water is not considered to be contaminated and may be disposed of to grade as storm water if a sheen or odor is not present. The discharge grade will be conducted in accordance with the facility Spill Prevention, Control and Countermeasures (SPCC) Plan under 40 CFR Part 112.
4. Records consisting of the date, time and estimated quantity of accumulation, presence or absence of sheen or odor, and person removing the accumulation are maintained for each discharge event.

ATTACHMENT 8

CLOSURE PLAN

USED OIL CLOSURE

The used oil processing and storage portion of the facility will be closed independently of the solid waste processing area. Both closure activities will be conducted concurrently in the event the facility finds it necessary to implement closure actions.

GENERAL/APPLICABILITY

This closure plan has been adopted in accordance with Chapter 62-710 Used Oil Management and Federal Register/Rules and Regulations 40 CFR Part *279.54* (h). The facility includes five approved ATRP eligible facilities, pursuant to which the State of Florida will clean up contamination under a schedule to be determined by the state based on the risk posed by the site. At this time, the sites have a score of seven (7), indicating the low priority, which the state has assigned to the sites. Prior to closing, the state will clean up eligible areas post-closure. Other areas are eligible for the PCPP and will be remediated by the state subject to co-payment.

CHARACTERISTICS AND SAMPLING

In the event the Company intends to close the used oil operations, the following procedures will control the closure activities:

- Used oil will be processed and sold.
- Waste waters will be processed through the wastewater facility located on the site as per Attachment 3 - Item 3.11
- Solids and residue will be disposed of as per Attachment *5* - "Solids Handling" of this Permit Application.
- Soil - If stained soil is present at the time of closure in areas that are not eligible for state-funded cleanup, one soil sample per site will be assigned to each distinct non-eligible location where contaminated soil exists. From each sample site, a representative sample should be collected for each *five-(5)* feet strata of contaminated soil. Soil will be analyzed for parameters in F.A.C. 62.770,
- Used Filters - A small quantity of used oil filters may be on hand at closure. These filters would be compacted and sold as scrap metal to a steel melting plant or scrap wholesaler.
- Miscellaneous oil residues will be removed from all filters, meters and pumps located at the facility.

SOIL SAMPLING FOR NON-ELIGIBLE AREAS

For non-eligible areas, soil samples will be analyzed for EPA Method 8260, 8270, FLAPRO and the TCLP metals Arsenic, Cadmium, Chromium and Lead. Sampling of the below listed areas will be performed in accordance with SW-846, or current sampling methods.

Groundwater will be sampled for EPA Method 624 (8260), 625 (8270), FLAPRO, arsenic, cadmium, chromium and lead. The above analytical methods selected are for used oil in soil and water. The monitoring wells will be analyzed for constituents, as set forth above to differentiate any eligible petroleum contamination from ineligible used oil contamination.

Should soil samples be found contaminated, groundwater will be sampled from the nearest hydraulically down gradient monitor well and analyzed by the above EPA methods, unless the soil analysis indicated a requirement for more appropriate analysis. If the location of the contaminated soil is such that an existing monitor well location is not appropriate, a monitor well will be installed in the source area and the appropriate sample taken. The Company will submit a Post-Closure Plan for FDEP approval if clean closure cannot be attained. This plan will respond to those areas and elements where clean closure could not be accomplished.

The sampling locations are shown in Figure 10-1. Five (5) soil samples will be obtained from each of the tank farm locations as indicated. One (I) soil sample will be obtained at the storm water drain area and one (1) soil sample will be obtained from the oil water separator (located outside the wall). Six (6) soil samples will be obtained from the southwest portion of the facility. One (I) soil sample will be obtained from each of the four corners of the southwest section. One (1) soil sample will be obtained from the sump in the truck wash area in the southwest section. One (1) soil sample will be obtained at the used oil container storage area in the southwest section. Soil samples will be collected and analyzed for the above listed parameters. The soil samples will be taken at from the surface to 24 inches below ground surface at each sampling location. The soil will be analyzed, as set forth above, to differentiate any eligible petroleum contamination from ineligible contamination.

The remaining areas of the Company facility will have five soil samples obtained from the surface to 24 inches below ground surface. The sampling locations will be determined by using Appendix D Random Number Table and Procedure in EPA-600/2-80-01 8 "Samplers and Sampling Procedures for Hazardous Waste Streams" as referenced by SW-846. A sampling grid method will be used. Drawing 10-1 has the grid laid out over the area not covered by the other closure sampling activities. The sampling grid is numbered from the northeast corner to the southwest corner. Five random numbers between one and the total number were obtained from Appendix D of "Samplers and Sampling Procedures for Hazardous Waste Streams". These areas are shown in Drawing 10-1 with an X in the grid. The sample is to be obtained from the center of the X or the center of the grid box for each of the five locations.

DECONTAMINATION

Residue collected from integral piping, tanks and equipment will be evaluated, and, if possible, will be used beneficially for energy recovery. Residue not managed as stated above will be disposed of using a recycling or thermal treatment facility permitted to manage used oil residues. Based on analytical test results, a composite sample from two (2) receiving tanks and two (2) finished product tanks will be collected in accordance with SW-846 or equivalent methods at the time of closure and characterization tests will be in accordance with the disposal facilities FDEP defined test parameters.

Decontaminated tanks and piping will be sold or disposed of as scrap to a metal recycling facility. The used oil tanks and piping will be decontaminated by pressure washing until the rinse water is visually clean.

SOLIDS GENERATED AT CLOSURE

The disposal of solids generated during the closure are the same as residue discussed in the closure Attachment Decontamination. For the purpose of closure, residue and solids are identical in nature.

ITEM 10.1.1 SCHEDULE FOR CLOSURE

The closure schedule will be dependent on the Company's ability to remove product and residues from the tank and piping system and coordinated through the State of Florida and pursuant of the work to be funded and remediated under the ATRP, and PCPP program, etc. Efforts will be made to remove oil product and residues within six (6) months of any operation shutdown, which intends permanent closure of the processing facility. Delays in the closure process associated with regulatory compliance issues may occur, and likely will impact the proposed schedule. The day closure activities are initiated is "D" day. Closure activities will be completed at D+365 days. The actual extent of contamination will be identified in the closure process. The closure schedule may be impacted based upon the amount and type of contamination identified if any.

Closure schedule:

Scheduled Event	**Scheduled Event Item Complete (Days After Closure Initiated)**
Closure initiated	**D**
Solid Waste Removed from Facility	**D+30**
Used oils processed and sold or removed (Six Weeks)	**D+42**
Decontaminate storage tanks and piping (Six Weeks)	**D+84**
Removal of tanks and piping (Eight Weeks)	**D+140**
Soil sampled and analyzed (Four Weeks)	**D+168**
Solid Waste Closure Complete	**D+180**

Oil water separator cleaned and closed (Three Weeks)	**D+189**
Groundwater Analysis (Eight Weeks)	**0+245**
Contaminated Soil Removal & Disposal (Eight Weeks)	**0+301**
Final Closure Certification Submittal (64 Days)	**D+365**

SOLID WASTE CLOSURE

The closure of the solid waste processing area is to be conducted concurrently with the closure of the used oil processing area. The solid waste closure plan applies only to solid waste stored on the area shown as the Solids Storage Area on Drawing 10-2 and the associated containment area.

The maximum quantity of solid waste stored at the Company Solids Storage Area will be 22,000 gallons. The maximum containment volume for the Solids Storage Area is 22,500 gallons. The volume of solid waste stored in the Solids Storage Area will not exceed 22,000 gallons. The solid waste will be stored in roll off boxes and containers. The solid waste will be marked with either "Processed Solids" or "Unprocessed Solids". The volume of the containers stored at the facility will be based upon the following chart or an equivalent conversion. Any combination of the different types of storage containers may be used as long as the total volume of solid waste stored does not exceed 22,000 gallons. The closure cost estimate has been prepared using the disposal cost for the 22,000 gallons of solid waste being in 55 gallon drums which is the most expensive to dispose of per unit volume. Used oil filters will not be managed as solid waste under this permit.

CONTAINER CAPACITY CHART FOR SOLID WASTE STORAGE

55 GALLON DRUM	55 GALLONS
500 GALLON TOTE	500 GALLONS
15 CUBIC YARD CONTAINER	3030 GALLONS
20 CUBIC YARD CONTAINER	4040 GALLONS

SOLID WASTE CLOSURE PLAN 62-701.700(3)(d)

Copies of this closure plan are kept in the facility's office permanent files.

This plan identifies steps that will be used to close the Solids Storage Area with respect to solid waste activities at the end of its intended operating life. No partial closure will be attempted.

Any modification to the existing operation plans or facility's design affecting the closure plan will result in the revision and updating of this closure plan.

The facility will maintain an on-site copy of the approved solid waste closure plan and all revisions to the plan until the certification of closure-completeness has been submitted to and accepted by the State of Florida Department of Environmental Protection, Southwest District Office.

The Company will notify the State of Florida DEP, Southwest District, at lease 180 days prior to the date the Company expects to commence solid waste closure activities.

Upon completion of the solid waste closure, the Company will submit to the State of Florida DEP, Southwest District office, a certification by both the Company and an independent registered professional environmental engineer that the facility has been closed in accordance with the specifications in the approved closure plan.

Closure Performance Standard

This closure plan was designed to insure that the facility would not require further maintenance and controls. It minimizes or eliminates threats to human health and the environment and prevents escape of special waste, waste constituents, contaminated rainfall runoff, waste decomposition products to the ground or surface waters or into the atmosphere.

All operation activities will be inside containers within the confines of the asphalt or concrete pad, so no ground/soil contamination is to be expected during the storage/bulking of wastes at the facility.

a) Any spillage of waste onto the impermeable surface would not result in any permanent contamination of that surface after the spill cleanup.

b) In the unlikely event of any accidental spillage of waste onto the uncovered ground (roadway, access way, etc.) on the property during ingress and egress to the facility's impermeable pad would be dealt with immediately as a spill as outlined in the contingency plan. No permanent contamination would result necessitating any closure decontamination.

c) When closure is implemented and the facility is out of service, all solid waste, solid waste vehicles and solid waste process equipment will be removed from the facility property within 30 days.

d) A facility inspection will be made with an independent registered professional environmental engineer to inspect for:
   --waste containers on site,
   --process equipment on site,
   --waste transport vehicle on site,
   --distressed vegetation on site,
   --odors,
   --anomalous residue or chemical debris on site,
   --degeneration or corrosion of impermeable areas on site.

e) In the event evidence is found at the time of closure that a solid waste discharge may have occurred, the Company shall implement the following:
   * All appropriate agencies will be notified;
   * Standard response actions will be initiated to remove and contain the suspected contaminate;
   * Samples of the affected area and background areas will be taken to determine the type and extent of contamination;
   * Once immediate or emergency steps have been completed, an assessment plan will be written;

* Subject to the completion of the assessment, a final remedial action plan will be written and implemented to restore the site.

Amendment of Closure Plan

In the event that the Company wishes to amend the approved solid waste closure plan prior to final closure of the facility, the Company will submit a written request to the Southwest District Office of the FDEP to authorize the change. The written request will include a copy of the amended closure plan for approval by Southwest District FDEP.

Consideration for amending the approved closure plan include:

f) Changes in facility size and capacity.
g) Changes in operation procedure.
h) Unexpected events requiring closure plan modifications.
i) Unexpected events requiring closure plan change during closure.

The following amendment time schedule will be adhered to. The Company will submit the amended solid waste closure plan to Southwest District Office of FDEP --

a) At least 30 days prior to a proposed change in the facility design/operation.
b) No later than 30 days after an unexpected event requires closure plan change.

In the event that the FDEP Southwest District Office requires a modification of the approved solid waste closure plan, the Company will submit the modified plan:

a) Within 30 days of the request
b) Within 30 days if the request is due to an unexpected event during closure.

Disposal or Decontamination of Equipment, Structures and Soils:

During the closure of this facility, any spill that may occur will be cleaned up immediately under the procedures established by the Contingency Plan.

In the event of a discharge, soils adjacent to the asphalt and concrete pads will be tested for contamination with current test procedures at the time and under the direction of the FDEP Southwest District Office. In the event contamination is found, the contaminated soils that exceed Clean Soil Guidance Criteria will be removed and transported by a permitted transporter to an approved disposal facility.

Certification of Closure

Within 180 days of receipt of final waste, all closure activities will be complete and the Company will submit to the FDEP, Southwest District Office by registered mail a certification that the facility has been closed in accordance with the specifications in the approved closure plan. The certification will be designed by an authorized representative

and by an independent registered professional environmental engineer. Documentation supporting the independent registered professional environmental engineer's certification will be furnished upon request to the Southwest District Office of FDEP until such time as the office releases the company from further responsibility for closure (62-701.630 - FAC).

ITEM 10.1.1 SOLID WASTE CLOSURE COST ESTIMATE

The Table 10-1 cost estimate for solid waste closure costs is being provided to calculate the dollar amount needed to close the solid waste portion of the Company's used oil processing facility at the end of its intended operating life. The financial responsibility requirements of F.A.C. 62-701.630 will be by the Company.

Each year on its permit anniversary date the Company will submit to the State of Florida DEP office in Tampa, an adjustment of the cost estimate based on inflation. Procedures for providing cost adjustments due to changes in the facility operations are addressed in the facility's Solid Waste Closure Plan.

The Company will guarantee the funding necessary for closure through a Certificate of Insurance for Pollution Liability & Closure/Post Closure or by a Surety Bond.

Solid Waste Closure Cost Estimate.

Disposal of Materials Remaining on Site (Price includes: loading, handling, transportation and disposal)

400 Drums x $50.00/Drum		= $20.000.
	Subtotal:	$20,000.

Sampling Labor, Oversite and Analysis

Engineer	$70.00/Hr. x 8 Hrs. x 2 Days	= $ 1,120.
Sampling Technician	$35.00/Hr. x 8 Hrs. x 2 Days	= $ 560.
Analysis	$3 00.00/ Drum x 20 Each	= $ 6,000.
Mileage	$0.30/Mile x 400 Miles	= $ 120.
Subtotal		$ 7,800.

Solid Waste Storage Slab Decontamination

Labor	$45.00/Hr x 4 Personnel x 8 Hrs. x 3 Days	=$ 4,320.
Vac Tanker	$90/HR x 8 Hrs x 5 Days	=$ 3,600.
PPE	$10/Unit x 4 Personnel x 3 Days	=$ 120.
Analysis	$300/Sample x 1 each	=$ 300.
IWW Disposal	$0.25/Gallon x 5000 Gallons	=$ 1,250.
Perdiem	$35.00/Day x 4 Personnel x 3 Days	=$ 420.
Hotel	$75.00/Day x 4 Personnel x 3 Days	=$ 900.
Pressure Washer	$175.00/Day x 3 Each x 3 Days	=$1,575.

Crew Truck	$125.00/Day x 1 Each x 3 Days	=$ 375.
Cleaner	$400.00/Drum x 1 Each	=$ 400.
Mileage Vac Tanker	$1.00/Mile x 400 Miles	=$ 400.
Mileage Crew Truck	$0.35/Mile x 400 Miles	=$ 140.
Engineer	$70.00/Hour x 24 Hours	=$1,680.
Mileage	$0.30/Mile x 400 Miles	=$ 120.
Subtotal		$15,600.

Engineering Closure Report

Engineer		$70.00/Hourx 16 hours	$1,120.
Mileage	$	0.30/Mile x 400 Miles/Trip x 2 Trips	= $ 240.
Subtotal			$ 1,360.

Total Closure Cost

The total estimated solid waste closure cost is $58,760.00 for the Solids Storage Area and containment area as shown on Drawing 10-2.

ATTACHMENT 9
TRAINING

Position Descriptions

All operators who manage used oil will receive 24-hour HAZWOPER training and annual 8-hour refresher training per 29 CFR 1910.120. Truck drivers will comply with all Florida Department of Transportation training. Drivers will also be trained in the proper operation of the analytical devices specified in the Waste Analysis Plan (Attachment 3).

New Employees

All new employees will be thoroughly trained on all company policies and procedures before being allowed to handle used oil or any processes. A modified version of the UAUOS training manual combined with the new FDEP Used Oil Regulations will also be utilized in this training.

On-going training

- All employees will be trained on an annual basis of facilities policies and procedures.
- In the event an employee has a change in job function, he/she will be trained in that new job function prior to being allowed to work unsupervised.
- In the event there is an incident at the facility, all employees involved in the incident will be re-trained prior to returning to their job function.

Form # 090106

COMPLIANCE CHECK LIST

DATE: 3-28-07

TO BE COMPLETED EVERY DAY AND TURNED IN BY 12:00 P.M.

	YES		NO		ACTION TAKEN
DRUMS & OIL DRIP CONTAINERS					
ALL CONTAINERS CLOSED & SEALED	✓				
ALL CONTAINERS PROPERLY LABELED	✓				
LABELS VISIBLE IN ISLE	✓				
PROPER ISLE SPACE	✓				
ROLL-OFFS					
CLOSED OR TARPED COMPLETELY	✓				
LEAKING			✓		
IN SECONDARY CONTAINMENT	✓				
LABELED AND DATED	✓				
DUMP TRAILERS					
TARPED COMPLETELY	✓				
LEAKING			✓		
IN SECONDARY CONTAIMENT	✓				
PROPERLY LABELED	✓				

FACILITY	YES		NO		ACTION TAKEN
NEAT & CLEAN (trash, cans, plastic bottles)	✓				
FILTERS OUT OF PRIMARY CONTAINMENT			✓		
DRIP CONTAINERS ARE EMPTY & SEALED	✓				
TRASH CANS & DUMPSTERS SEALED	✓				
LOADING DOCK IS EMPTY	✓				
LOADING DOCK GATE IS CLOSED & LOCKED	✓				
SPILLS OR RELEASES			✓		
STANDING WATER			✓		

SIGNATURES:

SUPERVISOR _____ **TIME** 0100

MANAGER _____ **TIME** _____

Form # 090106

4.0 EMERGENCY COORDINATOR (PIC) INFORMATION

Duties of the Emergency Coordinator or Designee

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

The following identifies the primary and alternate emergency coordinators:

Recycling Facility Primary Emergency Coordinator (Primary PIC)
Lee Morris
Cell Phone # 727-543-5429

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

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Tim Hagan
Cell Phone # 727-804-4446

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

5.0 ARRANGEMENTS WITH LOCAL AUTHORITIES

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

HOWCO ENVIRONMENTAL SERVICES

DRIVERS' MANUAL
2005

DRIVERS OPERATIONAL MANUAL:

I hereby acknowledge this _____ day of _____ in the year_____, confirming receipt of the DRIVER'S MANUAL containing regulations controlling the conduct and actions of drivers while working for HOWCO Environmental Services, as governed by rules of the Federal Department of Transportation.

My signature acknowledges that I agree to abide by all Company and Bureau of Motor Carrier Safety regulations prescribed therein, and that I will keep this manual in my possession while on duty.

Driver's Signature_____

Driver's Name (Printed)_____

Signature of Witness_____

DRIVER'S OPERATIONAL MANUAL

REVISE *REVISE*

TABLE OF CONTENTS

WELCOME . . .

We are a professional operation offering superior service to our customers; with the safest, most efficient drivers available; using late model, well-maintained equipment. We expect all drivers to preserve our reputation for safe driving; prompt, a courteous pick up and delivery; and compliance with all state and federal regulations. Above all, we want you to feel that you are part of the family at HOWCO ENVIRONMENTAL SERVICES.

In this manual, we will cover safety policies and discuss some things that are essential to professional truck operation and delivery service. If in doubt about anything, contact the company's Transportation Manager or Dispatcher.

TO: ALL DRIVERS

This manual formalizes our longstanding pursuit of perfection in human health, safety, and loss prevention.

Today's driving demands a new type of driver with an up-to-date attitude.

The increased complexity of operating a commercial vehicle in all weather around-the-clock operations, and the vast increase in traffic volume make it essential that drivers update their knowledge and ability in commercial truck handling.

The staggering burden placed on trucking companies due to losses must be corrected. We must seriously realize the necessity for proper awareness in preventing accidents. It will be our policy to demand from all drivers this awareness in preventing accidents.

I expect 100% defensive driving practices by all drivers, the use of common sense and the strict observance of Federal, State, Local and Company rules.

Management takes pride in our operators and their attitude toward others on the road. By working together, we can eliminate the accident problem, resulting in a better and richer life for all of us.

Remember, it is **YOUR** attitude that counts and **YOU** can prevent accidents.

Tim Hagan,
President & CEO

PART I
THE DRIVER

A. EMPLOYMENT

When you are given this manual, you have met certain basic qualifications as a driver applicant for HOWCO Environmental Services. You will have passed a road test and a physical examination.

During the next few weeks, you will be in training. You will be expected to learn a lot in a short time. This manual will help you learn what is expected of you.

It is agreed and understood that the driver will be on a 90-day, probationary period during which time he may be discharged without recourse.

The Transportation Manager and Dispatcher are directly in charge of all drivers.

B. PERSONAL APPEARANCE

Neat personal appearance makes a favorable impression on the public and the company's customers. The impression they form of the driver is the impression they form of our Company.

Long hair and facial hair present a particular hazard for our employees. Long hair can easily become tangled in moving machinery and facial hair can obstruct the proper fit of respirators and breathing apparatus. Mustaches and beards will be kept neat and trimmed. Many of our customers will not allow access to their facilities unless you meet this standard. With these points in mind, the Company has adopted the following policy:

> The Company has a prescribed uniform ,shirts, slacks, black belt, black steel-toed safety shoes and has provided a cleaning service to clean your uniforms at no charge to you, provided that all of your dirty uniforms are turned in each week. Dirty uniforms shall not be worn home or leave Company property. White undershirts only may be worn under the uniform. All drivers shall be dressed in complete uniform while on the job. Protective eyewear shall be worn in the yard facility at all times. If you wear prescription glasses, they will serve as eye protection, as will sunglasses.

C. PERSONNEL

The Company expects its drivers to conduct themselves in a professional manner at all times. You are its representative in constant contact with its customers. By your action, both at our facility and our customer's sites, you can help build goodwill. Be as courteous as possible and never enter into an argument with a customer or his representative. If you find yourself being confronted by an angry

or irrational customer, do not argue. Call the Customer Service Department and they will handle the customer. Drivers are not to contact any government agency (i.e., City of St. Petersburg, Florida Department of Environmental Protection [DEP], etc.) regarding questions. All questions are to be forwarded to your Supervisor.

D. OPERATING PROCEDURES AND POLICIES

1. It shall be the responsibility of the driver for the following:

   a. To comply always with Company operating procedures and policies.

   b. To comply always with the rules, regulations and laws of the Federal, State, and such other regulatory agencies having jurisdiction. (Reference FMC Safety Regulations Pocketbook, Pocket Guide to Hazardous Materials, Emergency Response Guidebook & FDOT Trucking Manual.)

   c. To load, transport, and unload each shipment from origin to destination without delay, in route unless otherwise directed by your Supervisor.

   d. To report, in writing on the appropriate form, all accidents, spills and injuries to the Transportation Manager/Dispatcher immediately, no matter how minor they seem.

   e. Not to allow any firearms, knives, or concealed weapons of any kind on Company property.

   f. Not to allow any pets or animals in the vehicles under any circumstances.

   g. To wipe off any and all product splashes or drips from the vehicle which occur during the day. This includes oily handprints on doors and ladders.

   h. Vehicle inspection and paperwork requirements.

E. TRAINING

New employees will make student trips with driver trainers when first employed. You will be taught how to handle the equipment, loading and unloading, various Company policies, paperwork, etc. You will be required to attend regular Safety and Training Sessions. Your Supervisor will provide dates and times. Those who so desire will also be trained for, and be a part of, our Emergency Response Team.

F. SCHEDULES

The Company requires that a driver shall have a telephone at their home. Because of possible fluctuation of your schedule and emergencies, the Company must be able to contact you during off hours. All Company provided phones must be on and fully charged from the beginning of your business day until at least 5:00 p.m. If you are a member of the Emergency Response Team, you are required to have your cell-phone turned on twenty four hours a day, seven days a week.

PART II
THE EQUIPMENT

A. EQUIPMENT MAINTENANCE

The law requires a driver to refuse to drive a unit considered dangerously in need of repair. This places the burden of responsibility squarely on you, the driver. Should you feel your vehicle needs to be taken out of service, you MUST report it to your Supervisor.

B. DAILY TRUCK INSPECTION

The procedure outlined below is standard for checking Company units. It is believed to be the quickest, most thorough method possible for checking the condition of a unit. Units are to be inspected daily, before and after the day's run. The inspection starts on the left front of the unit and proceeds counterclockwise around the unit, ending at the front. This complies with DOT regulations. A one-half hour period is allotted for pre and post trips.

1. Check water, fuel and oil and add if necessary - leave hood up.

2. Start engine, wait for the oil pressure to build up, then idle diesel engine at 1,000 RPM.

3. Turn on lights.

4. Check tires and inspect wheels and lugs.

5. Check lights - clean stop lights and turn signals. Make sure all are working properly.

6. Be sure landing gear is up.

7. Check emergency equipment. Never leave the yard in a unit that does not have a fire extinguisher mounted on brackets in the cab and flags or reflectors.

8. Clean windshield and windows.

9. Check for fuel, water, and oil leaks - fasten hood.

10. Check panel gauges and windshield wipers.

11. Check steering - any excessive looseness demands that linkage be checked.

12. Cut off engine and make air system check.

    a. Depress brake pedal.

    b. After the initial pressure drop, watch the air pressure gauge to see if it holds steady or continues to fall. When brakes applied, pressure should not drop more than 3 lbs. per minute.

13. Drivers are visually to check their vehicle, product tank, and compartment(s) before movement of the vehicle to ensure proper product loading or unloading. Make sure they fill your truck to the proper amount, or empty, before moving the vehicle.

14. Drivers are required to fill out, sign and turn in the "Driver's Vehicle Inspection Report" before exiting Company property. A copy must be kept in the vehicle with the driver.

15. Inspect for damage, leaks and that the vehicle is clean and presentable to our customers.

16. Once you have started your vehicle, do not shut it off until you return at the end of the day, if possible. You must lock your vehicle doors, while it is unattended.

17. Drivers are to clock in at their designated time, start your truck, complete truck inspections, then return to the Drivers' Room to organize your paperwork. This will enable the vehicle time to warm up before exiting the facility.

18. Drivers are responsible for damage not reported, see Part IV.D.

C. TIRES

Tires are one of the greatest cost items that drivers can help control.

1. Tires should be inflated to a minimum of 80 lbs. pressure.

2. Avoid riding edges of pavement and rubbing tires against bridges, curbs, etc.

3. Always make pre-trip inspections of tires. Bump tires and check wheels each time you stop and at least every 100 miles or two hours. After changing a tire, lugs should be checked for tightness after traveling no more than 20 miles.

4. Report any unusual wear on a tire. Report any other abnormal conditions such as fender rubbing tires, etc.

5. Remove foreign objects from tires while loading and unloading.

6. In the event you have a flat tire or blow out a tire, the following procedure must be followed:

    a. Pull off the road at a safe location using the emergency stopping procedures.

    b. Identify the size and location of the tire on the unit and the unit number.

    c. Contact your Supervisor.

    e. Once a service person arrives, they will repair the flat tire. If the tire has blown out, they will replace it.

    f. When ready to roll, sign the Service Ticket, get a copy and release the service truck. Make sure our P.O. number (if available) is on their Service Ticket.

PART III
HANDLING CARGO

A. GENERAL

A driver shall always stay with his unit while loading or unloading. A driver may be terminated for leaving his vehicle unattended while loading or unloading.

Any tank truck or trailer being loaded or unloaded with a pump must have an open dome lid. The procedure is to open the lid, place the dome latches over the lid seating the ring, then lay the lid down on it. This gives an opening large enough to relieve the trailer and does not expose the product by having the dome completely open.

B. ROUTE DRIVERS

1. Route drivers shall follow these procedures at each pick up:

   a. When a driver reaches any destination or any customer location, the driver shall attempt to park his vehicle in an area that will not disturb the business flow of traffic in and out of the customer's facility.

   b. After parking the vehicle, the driver will check in with the contact person, if the manifest has driver instructions in the comment area. The driver will verify the instructions with the contact person prior to performing any services.

   c. After the driver has checked with the contact person at each facility, and has been approved to service the facility, the driver will then follow the testing procedures stated in Part III, Section C.

   d. The driver has to determine if the customer needs filter and/or absorbent service by asking the contact person or looking around the customer site, for filter or absorbent drums.
   Tim's NOTE: Place #S (Memo dated Nov. 3) here.

   e. The driver is routed by the Companies Logistics Coordinator. All routes are to be driven in stop route order, as designated by the Coordinator.

2. The driver will first ensure that the filter basket on the truck is clean, and that the closed end wand is used during **all** pumping activity. All product **must** be pumped through the filter basket. **NO** product may be pumped directly into the truck through any other means, including the dome lids.

   Connecting the hose to the wand will be done with care, being sure the cam lock has a good gasket and the seal is tight before pumping. If a leak is detected, pumping operations will be shut down immediately, until necessary repairs are made, before continuing pumping operations.

C. TESTING PROCEDURES

Each driver shall be issued a Halogen leak detector (Sniffer) and a reference fluid sample of 900 PPM. Your supervisor will have the Sniffers serviced and properly set on the first business day of each month. It is the driver's responsibility to present the Sniffer to the lab chemist. New reference standards shall be issued monthly.

All liquid products, including liquids in drums (water, oil, free product, antifreeze, water soluble oil) must be tested (sniffed ~~or~~ and if necessary, dexsiled) for Halogens before loading onto any company truck, including recovery, vacuum, and drum or box). Testing method(s) and results shall be documented in the comment section of the manifest. The procedure below shall be followed:

1. Testing procedures prior to collection: When the driver arrives at the customer/generator site the driver shall pull a representative sample from their tank(s) and/or each drum and use a Sniffer, referenced at 900 ppm, to test the oil for the presence of volatile chlorinated compounds above 900 ppm. To determine that the Sniffer is working properly, follow these steps to calibrate the Sniffer :

    a. Shake the 900 ppm reference standard.

    b. Remove the lid.

    c. Place the tip of the Sniffer into the headspace of the bottle being careful not to touch the tip of the Sniffer into the liquid.

    d. Turn on the Sniffer.

    e. Hold the tip of the Sniffer in the bottle for fifteen seconds (approx. 21 beeps). The beeps should remain constant.

2. If the Sniffer indicates a presence of halogenated compounds above 900 ppm (peaks out), the driver must then inform the customer, describe the Dexsil test and cost, and request permission to do a Chlor-D-Tect 1000 (Dexsil) test (EPA method 9077). If the customer/generator is willing to pay, the driver shall then perform the Dexsil. Once this field test has been performed and the results indicate less than 1000 ppm, the driver shall then document the results of the Dexsil on the manifest and pump the oil. If this Dexsil indicates greater than 1000 ppm, the oil shall be rejected. The driver may bring back a sample of the potentially hazardous material for further testing. The driver must indicate the result of the Dexsil on the manifest, along with the cost of the service. The notation on the manifest will enable our sales department to be notified. Explain to the customer/generator that you are not allowed by Federal Law to pick up the product and that the product must be disposed of by using a company certified to transport hazardous waste. Have Customer Service advise the customer that they can make arrangements with a certified company. Should the customer refuse to allow any further testing, make the proper notation on the manifest along with the date, time, and name of the individual refusing the testing procedures. The driver shall inform the customer not to add any additional product since it will also become contaminated and compound the problem. REMEMBER: DO NOT PUMP THE PRODUCT OR REMOVE IT FROM THE PREMISES.

    EXCEPTION: Conditionally Exempt Small Quantity Generator (CE-SQG) or Public Drop Off sites - The driver shall check the verbiage on the bottom of the manifest or obtain a copy of the certificate of registration to verify that the customer is registered as a Public Drop Off or CE-SQG and attach it to the Manifest. Liquid product must still be tested with a Sniffer, if the product fails the Sniffer test, the driver must indicate this on the appropriate space on the manifest. Make certain that Public Drop Offs have a separate tank for the do-it-yourselfers, and a different tank for the shop oil. These may never be mixed before pick up.

NOTE: Drivers repeat the calibration procedure at every stop prior to sniffing the product.

3. After the liquids are tested for chlorinated solvents, the driver shall then determinc if there is any free water in the storage container before removing the oil (refer to page 8, item D). If there is water present, the customer/generator must be notified beforehand how much is there and how much it will cost for disposal. If the customer/generator instructs the driver to remove the water, it must then be placed in the waste water compartment on the pump truck and the oil shall be pumped into the used oil compartment. Antifreeze and Water Soluble oils must be kept separate from oil and from each other. Drivers may put water in with the oil if necessary.

4. Driver is responsible for ensuring his Sniffer is in good working order by having their halogen Sniffer calibrated on a monthly basis, and making sure the halogen standard he uses to set the Sniffer is not more than thirty days old. The COMPANY ~~lab~~ will clean Sniffers monthly and provide new halogen test standards to each driver the day before the first working day of every month. If the Sniffer malfunctions during the day, the driver shall immediately call the supervisor for further instructions. The driver shall turn the Sniffer in to the Supervisor upon return to the facility, for service. The driver shall obtain a spare Sniffer for use the next work day

5. If the liquids being tested show that the amount of total halogens is less than 1000 ppm, the driver will then stick (method of measurement) his Truck Tank and look on his chart which shows the gallons per inch capacity of his tank(s), then proceed to pump the customer's tank, calculating the gallons going into the tank truck with the chart that each driver has on the vehicle. If during pumping out the customer's used oil tank the driver determines that there is rain water or antifreeze present in the bottom of the tank, the driver must stop pumping and inform the generator or the customer that there is water present in his tank, and of the appropriate charges involved. If the charges are approved, continue pumping to the appropriate tank on your vehicle. AGAIN, DO NOT MIX PRODUCTS, only oil and water, and only if it is necessary to provide the best customer service possible. If charges are not approved, do not pump any further. Indicate these circumstances in the comment section of the manifest and obtain the customer's signature.

NOTE: If there is no one on- site to sign the manifest, the driver shall indicate this in the **comments** section of the manifest, returning the manifest to the office for mailing to the customer.

D. PUMPING PROCEDURES AND RECOVERY

CAUTION: When pumping from non-automotive customer sites be wary of all product contents. Never pump any product through an open-end wand, or allow any product to enter your tanks without going through the filter basket. This could result in very expensive damage, for which you could be held responsible. When pumping from drums be especially mindful of the Hazardous Waste Mixture Rule CFR 40.260). The driver will assume that the first product will be water or emulsified oil. Before pumping, the driver will direct the flow of the product being pumped into his water compartment first. After allowing enough time to clean the line and having determined product is being pumped, the driver will switch to the appropriate tank for that product and continue to pump. Caution: The driver must make sure that the second (oil) compartment valve is open before closing the first (water) compartment or pump damage may occur. When the pumping activity has been completed, the driver will carefully disconnect the wand from the hose and look to see that no product has leaked onto the ground. Placing an Absorbent pad under the connection can do this, then returning the hose into its place on the truck.

When the driver removes the wand from the tank or drum, care should be taken to ensure the oil does not drip onto the ground. Again, an Absorbent pad can be used to wipe down the wand when taking it out of the tank or drum.

The driver will under no circumstances allow any pumping activity when the driver is not directly at the truck. The driver should remain on the top of the truck to ensure his compartment will not overflow.

After completing the pump activity, driver will look around and under the recovery truck to ensure that no product has leaked or spilled onto the ground. If so, the driver will immediately clean (wipe) up the area.

E. PUMPING ON/OFF TANKER TRAILERS:

When unloading your trailer truck you must follow the procedures below in order:

1. Be sure unit is secured against rolling away by applying tractor and tanker trailer brakes.

2. Always present the shipping papers (manifest) to the customer before you unload so that the customer can verify the instructions on the manifest are accurate. Confirm with the customer that the designated tank s the proper tank to receive product and that the receiving tank will hold the delivered amount of gallons, without causing an overflow.

3. Put a bucket and absorbent pad under your filter. Unscrew filter housing, remove filters, and visually check for clogging and debris. Clean if necessary. Replace filters, making sure gasket is properly seated in filter housing lid. Screw down tightly.

4. Remove hose from tanker trailer. Put bucket and absorbent pad under tanker trailer fitting and connect hose to your tank, while placing the dust cap or plug on the absorbent pad. Remove bucket and place under pump suction fitting. Connect suction line to pump.

5. Pull second hose and with bucket and absorbent pad under discharge fitting, attach hose to pump. Move bucket and absorbent pad to receiving tank connection and attach hose to receiving tank fitting.

6. Open dome lids on your tanker trailer. Open internal safety valve and trailer valve. Go to receiving tank, open dome lids and confirm tank can hold your load. If you cannot confirm that the receiving tank you're pumping into will hold your entire load, STOP and call your Transportation Manager/Dispatcher. Under NO circumstances pump the load into a receiving tank you personally have not checked and confirmed will take it all. Now you are ready to pump into receiving tank. Engage P.T.O. to pump.

7. Check all hoses, camlock, pump and receiving tank for leaks. Should leaks be spotted, stop immediately. (Fix leak and clean up spill.) Go to receiving tank and check to ensure pumping operation has started. STAY ON TOP OF RECEIVING TANK AT ALL TIMES except periodic checking of pumping operation. Make sure you are on top of tank during the last ten minutes. When product is 12" from the top of the tank, or at predetermined level, or if you detect air pumping into the tank, safely go down and close valves on the tanker trailer. Walk discharge hose to pump, disconnect using a bucket and absorbent pad and plug. Suction will occur if discharge hose is still connected. Walk discharge hose to receiving tank. Close valve on receiving tank. Go immediately to tractor and turn off pump. Using a bucket and absorbent pad, disconnect and plug hose. Place hoses on tanker trailer. Survey work area for spill or other problems.

8. There shall be NO SMOKING around a loading or unloading location. Drivers must not smoke or allow anyone else to smoke while loading or unloading.

9. Close and lock down dome lids on the receiving tank and your tanker trailer.

~~TUESDAY START~~

F. PICKUP PROCEDURES

1. The truck driver shall inspect and verify the truck contents to ensure that the amount of empty drums on the truck, at a minimum, matches the amount of empty drums manifested for the working day.

2. Upon arriving at a customer's site, the driver shall contact the contact person listed on the manifest, to confirm that the instructions on the manifest are correct.

3. All drums of filters shall be marked with the corresponding manifest number, using Company drum stickers, or generic non-hazardous waste stickers, with the product contained within, clearly marked on the label with a paint pen. Lids and rings will be checked for security, lids will be tightened down as needed. The customer/generator will receive empty replacement drums. Note: If a rental box truck is used, all drums will be marked, and empty drum rotation required.

6. Liquid drums will follow the sampling and testing procedure listed in Section C of this manual. If drums conform, they will be closed, and labeled in the same manner as the filter

drums. If drums containing liquids do not conform, the driver will follow the procedure outlined in section [redacted] of this manual. **CAUTION:** Drivers are to be cautious when servicing drums at any industrial customer. Drums are far more likely to be contaminated at an industrial site.

7. All solid waste drums (i.e., soil, sludge, drill cuttings, ABS) shall only be collected if the manifest states an approval waste ID number, of at least four digits and an approval date of not older than five (5) years.

G. SCHEDULE

It is important to meet times scheduled. If you are late, the customer could be detained from accomplishing his planned business. If you are going to be delayed on an appointed/delivery time, you must notify your Supervisor immediately.

H. HAZARDOUS MATERIALS

You have been supplied with a copy of the Federal Motor Carrier Safety Regulations including regulations governing transportation and handling of hazardous materials. It is your responsibility to thoroughly familiarize yourself with these rules and to strictly abide by each of them. Some of the important rules are:

1. You cannot smoke on or within 25 feet of vehicles transporting flammables or combustibles whether you are loaded or empty, whether you are in or outside the cab of the tractor, and whether or not you are moving.

2. When you are in the cab of your vehicle, your manifest must be within your reach while you are restrained by your seat belts. If you leave the cab of your vehicle, for any reason, you must leave the shipping papers on the driver's seat, or door pouch, with the dispatch facing up.

3. When you park a vehicle which is transporting or has transported a hazardous material, it must be parked in a safe haven and never may it be parked closer than 5 feet from the traveled portion of any highway. If local authorities have designated specific areas for parking such vehicles, you must comply.

4. While loading or unloading hazardous materials, you must remain with your vehicle. Violation of this policy could result in termination.

5. Make sure your vehicle is properly placarded for the materials you are transporting. The shipper or your Supervisor will supply you with the proper placards, but it is your responsibility to see there is a placard on both sides and one on each end of your tank. Replace immediately any faded or missing placards.

6. It is your responsibility to check your tank and all connections for leaks. If a leak is discovered, do not move the vehicle. Stop the leak if you can. If you cannot, call your Supervisor for instructions.

7. ***You must come to a complete stop at all railroad crossings as required by DOT regulations.***

I. WHAT IS A SPILL?

Spill Prevention and Definition:

A spill is an accidental release of any amount of water, oil, antifreeze, free product, water soluble oil, etc., that you are handling including, but not limited to:

1. Left over product - the spill from your hose or fittings onto the ground.

2. Any product that comes out of your dome lid on the top of the tank.

3. Overflowing of a tank into which you are pumping.

4. Any excessive leaks, broken pipes, or P.T.O. (Power Take-Off) leaks.

5. Any time product meets the ground in excess of one quart.

If any of the above (1-5) occurs, you are required to:

A. Notify your Supervisor immediately
B. Take pictures of the spill
C. Fill out an Accident Spill Report, as part of your Vehicle Incident reporting Kit

Spill Preventions:

The best way to treat a spill is <u>not to have one</u>. You can almost always prevent spills and tank over flows by taking the time to:

1. Think ahead.

2. Ask yourself what can go wrong.

3. Placing bucket and absorbent pad under your hose before uncoupling fitting under valves.

4. Walk your hose empty.

5. Walk up on the tank into which you are pumping. Check the void space in the tank before you start pumping.

6. Make sure all the right valves are open.

7. Inspect all equipment serviceability and security of all fittings and connections <u>before</u> you start pumping.

8. Make sure all your compartment dome lids are open.

9. After engaging P.T.O., (Power Take-Off), inspect the receiving tank to ensure you are pumping. Stay on top of receiving tank to make sure it does not overfill.

Remember: You are responsible!

J. GENERAL OVERVIEW - RESPONSE PLAN

For spills consisting of petroleum products that may endanger human health, welfare, or the environment, notification is necessary. The State of Florida Department of Environmental Protection requests immediate notification of any petroleum discharge of 25 gallons or greater. Notify your Supervisor in this case, immediately, your Supervisor will notify the proper authorities.

If the petroleum discharge is into the water, you must notify FDEP immediately and possibly the United States Coast Guard if the discharge is in navigable waterways.

It is a violation to purposely discharge any type of hazardous material that may cause pollution, harm or injure human health, welfare, animal, plant, aquatic life or the environment.

K. REPORTING SPILLS

1. The telephone numbers for reporting spills:

Immediately Call: 1-800-435-8467 - Facility Response Personnel, i.e., Supervisor. After hours, contact your Supervisor on cell phone.

2. Be prepared to report the following information to your Supervisor:

   a. Name, address and telephone number of person reporting.

   b. Exact location of spill.

   c. Company name and location.

   d. Material spilled.

   e. Estimated quantity.

   f. Source of spill.

   g. Cause of spill.

   h. Name of body of water involved, or nearest body of water to the spill.

   I. Action taken for containment and clean-up.

In case of fire, notify the authorities and your Supervisor, immediately and try to extinguish the fire unless this act would endanger your life.

L. EMERGENCY RESPONSE PROCEDURES

1. Immediate steps for drivers:

   a. Stay with vehicle until help arrives.

   b. Call 911 for fire, medical or police assistance.

   c. Use emergency numbers in spill plan to contact appropriate persons.

   d. Keep the public away.

   e. Dike off or boom liquids from entering sewers, storm sewers, or waterways - follow emergency plan for further containment.

P. EMERGENCY RESPONSE PLAN

This practical emergency response plan is designed to provide a guide to appropriate actions in the event of a spill. The most important thing is to remain calm and try to get the situation under control as much as possible. If you are hurt or incapacitated, notify emergency personnel of the copy of this plan that should be in the glove box.

1. Do not panic; remain calm. Examine your own condition first. If you or anyone else is hurt or incapacitated, call for medical assistance.

2. If you are OK, assess the extent of rupture or damage to the vehicle. Close off any valves, hatches, or hoses - this will help stop the oil flow.

3. Try to evaluate the degree of contamination to the environment, and estimate the amount of gallons spilled.

4. If possible, pump liquid back into the tank, even if tank is ruptured. This will recycle the spilled oil to the truck rather than spreading on the ground.

5. Do your best to dike ahead of the spill to prevent oil from entering sewers and waterways.

Q. SPILL CONTAINMENT PROCEDURES

1. Spills on water:

   a. Call for booms or sweeps in lengths appropriate to contain spill. Until help arrives, use tree branches, extension hoses, or any object that will float to prevent the oil from spreading. Skim oil into truck if possible. Determine the direction of the flow of water and set booms in front of flow to dam the oil. If notified help is not sufficient for the volume of spilled oil, call for tankers or vac trucks with skimmers.

2. Spills on pavement:

   a. Call for booms, pads and clay absorbent (oil dry) in amounts appropriate for spill. Use booms to contain spill by wiping them in a circular motion. Use truck pump with skimmer to remove oil. If spill is too large for booms; (a) call for sand, and contain the spill by using sand to circle the spill; (b) call for vac truck, skimmer and backhoe. Remove oil-soaked sand, place on plastic tarps and cover with additional plastic or tarps to prevent rain from spreading oil.

3. Spills on soil:

   a. Call for earth-moving equipment (loader, backhoe, dump truck) and sand. Determine direction of oil flow, and excavate an area for the oil to flow into. Around spill, contain oil with sand berm. Pump liquid oils into truck. Prepare a plastic tarp and sand berm on an area of clean ground. Remove oil-soaked soil to tarp while making sure that soil is contained by tarp and berm. Have backhoe remove one foot below surface of spill, or until visually clean. Call for further assistance to remove soil for treatment.

4. Emergency response action plan:

   Company Name:

   HOWCO Environmental Services
   3701 Central Avenue
   St. Petersburg, FL 33713
   Phone: (727) 327-8467; or (800) 435-8467

The person in charge (PIC) of the terminal facility is in charge of notification to FDEP of any accidental discharge into the surface water and/or soil.

For discharges on land in excess of 25 gallons, file FDEP Form 17-761.900(1).

5. Notification procedures:

a. Report the following information:

(1) Name, occupation, title and telephone number of person making notification.

(2) Type of pollutant spilled.

(3) Location of the spill.

(4) Size of area affected by the spill.

(5) Cause of spill.

(6) Type of tanker or vessel involved in the spill.

(7) Estimated amount of spill.

(8) Persons or agencies already contacted.

(9) Containment and clean-up efforts to date.

(10) Person or firm in charge of source.

6. Spill Mitigation Procedures:

a. Oil spill check-off list, if a spill is discovered:

(1) Report spill to your Supervisor. The Supervisor will notify FDEP.

(2) Search for, locate, and verify any spill.

(3) If casualty related, stabilize the situation (vessel collision/fire/pipeline damage).

(4) Immediately stop, control or mitigate the spill and contain the pollutant.

(5) Deploy/apply response equipment carried in tank truck.

(6) Act as on-scene coordinator until relieved of that duty by:

a - Another authorized Transportation employee;
b - On-scene coordinator designated by Transportation Manager/Dispatcher.

(7) Verify with Transportation Manager/Dispatcher that required notifications have been made.

7. Facility's response activities:

   a. Leak at pump, hoses/couplings: Shut down all power to unit by disengaging PTO. Contain any spillage that has occurred. Once contained, form a dike around the spill with absorbent boom, dry absorbent or sand. Then recover oil and absorbent with shovel or absorbent pads. After material is recovered, store and dispose of properly.

   b. Over flow of tank: Shut down all power to unit by disengaging PTO. Put absorbent boom completely around tanker. Proceed with steps outlined above in example 1.

   c. Leaking tank: Shut down all transfer operations. Plug if possible. Try to collect any leaks with bucket or drip pan. Recover any spill as outlined in example 1. Call your Supervisor for back-up tanker trailer. Transfer any product from leaking compartment to another compartment.

   d. Fire on vessel or tanker: Shut down all pumping operations. Use dry chemical, CO_2 or foam to fight fuel or fires. DO NOT use water to fight fire. Call Fire Emergency (911).

8. Spill Scenarios

Scenario (A)

> The average-level, most probable discharge would occur during hook-up of transfer hoses. The volume of product discharge for this type of spill would be less than 20 gallons.

To prevent a spill of this kind, make sure hoses are empty of product BEFORE TRANSFER OPERATIONS begin! After locking couplings together tie an absorbent pad around the ears of the coupling for incidental leaks. Place absorbent materials at all connections.

If a spill should occur during hook-up of transfer hoses, immediately put hose end in a 5-gallon bucket. Engage PTO and drain hoses of product. While PTO is engaged, pump onto tanker any free product that may have spilled. Assess the situation and act accordingly.

Scenario (B)

> The maximum-level, most probable discharge would occur during pump-off operations, if the transfer hose or pump would compromise integrity or tank overflow. The volume of product discharge for this type of spill would be less than 200 gallons.

To prevent a spill of this kind, BEFORE PUMPING OPERATIONS BEGIN, inspect all hoses and connections for cracks, broken straps, and worn areas. At all times during pumping, be alert to mechanical problems. During pumping operations, look at pump and connections to spot potential problems. Check volume often during pumping operations.

If a spill should occur during pumping operations, immediately shut down pumping operations. Do this by shutting off the PTO. Contain spill, if not already done, by using the booms. If the problem can be fixed or solved, restart PTO and pump any free product back onto the tanker. Assess the situation and act accordingly.

Scenario (C):

A worst-case discharge would occur with tank integrity compromise. The volume of product discharge for this type of spill would be 6,800 gallons, if fully loaded.

This would be the worst-case spill for The Company. Each driver must inspect his tanker daily. Look for weeping product from any stress cracks. If cracks are detected, immediately WRITE IT UP ON YOUR DAILY INSPECTION REPORT FORM and OUT OF SERVICE (OOS) THE TANKER. NEVER USE AN UNREPAIRED TANKER FOR ANY TRANSFERS. If a spill of this kind occurs, immediately STOP all pumping activities by shutting off the PTO. Give full attention to the problem at hand.

9. Disposal plan.

All waterways and land areas will be tested to verify completion of clean-up operations. Water and soil samples will be sent to a certified laboratory.

All materials will be manifested, transported, and disposed of according to EPA guidelines.

10. Notification Procedures.

The size and location of the spill and the threat of any further discharge will determine the equipment and response needed to quickly and correctly respond to, contain and recover the pollutant.

The amount, type, and characteristics of the pollutant must be quickly verified and reported to the Transportation Department Manager who will summon appropriate equipment and personal resources.

In the event that Company personnel and equipment are unable to respond, the Company has contracted with the clean-up firm of Southern Waste Services to quickly respond to any spill. They can be on the scene with up to 5,000 feet of containment boom and commence deploying boom within one hour of receiving our telephone report of the spill.

It is the responsibility of the driver of the tanker to act as the person in charge until relieved of that duty by the Transportation Manager/Dispatcher or the Incident Commander.

PART IV
SAFETY PROGRAM

A. SAFETY MEETINGS

Safety meetings are held in conjunction with monthly drivers' meetings. Your attendance and participation are mandatory unless you have previously arranged with your Transportation Manager/Dispatcher to be excused.

B. TIME CARDS

Hourly drivers are entitled to overtime for all time worked more than forty hours.

1. Our work week starts at 12:01 Sunday morning.

2. Should you not be able to work your scheduled day, you are to request that day off from the Transportation Manager/Dispatcher five (5) working days prior. If it is an emergency or if you are sick, you must notify the Transportation Manager/Dispatcher, by phone, as much before the starting time of your shift as possible. Before or after hours, call the Transportation Manager/Dispatcher. Not calling in before your shift will be considered a violation of Company policy.

3. Only the person whose name is on the time card is authorized to swipe in or out on that card. NO OTHER PERSON IS ALLOWED TO SWIPE YOUR TIME CARD FOR YOU.

4. Hourly drivers shall clock in at the exact time specified by the Transportation Manager/Dispatcher. You may clock in five (5) minutes before your shift. EXCEPTION: On meeting days, all drivers shall clock in at designated time.

5. Clocking in earlier or later than the designated time will be considered a violation of Company policy.

6. The time clock system has been replaced by data processing. All employees will be paid based upon the information accumulated by the data machine. This information is the result of your electronic card swipes during the pay period. If you fail to swipe in or out, it is your responsibility to prepare a Payroll Adjustment Card and have it approved by your Transportation Manager/ Dispatcher, and processed by the accounting department during the current pay period in order to be paid for this time. If the missing information is not received during the pay period in which it occurred, the time missed will not be paid until the following pay period.

C. ACCIDENT REPORTS

Any accident causing any damage to the Company's property equipment or to any person or property must be reported. It is the driver's responsibility to report to his Transportation Manager/Dispatcher any accident, or near accident, involving any other vehicle, personal injury, property damage, spillage, mixtures, or contamination from the scene or the nearest available telephone. Notify the police immediately, then the Transportation Manager. An accident report must be filled out

completely and turned in when the driver returns to the facility. Each driver will be issued an accident kit, including a camera, as photographs will be required to document the scene.
You are required to take pictures of all damage to all vehicles and property, involved in the accident.

D. ACCIDENT REVIEW

If you are involved in an accident or other incident such as a spill, mixture, contamination, etc., the circumstances will be reviewed immediately by your supervisor and Company management. You will be notified if you will be subject to any disciplinary action. You may be required to pay for the damages resulting from the accident or part of it; you may be suspended without pay; you may be discharged; or you may be subject to other action appropriate for the circumstances.

E. SAFETY OPERATING RULES

1. Use of, possession of, or being under the influence of any alcoholic beverages, narcotics, barbiturates, or amphetamine drugs, while on duty or on Company property is strictly prohibited and will result in immediate termination. If your doctor prescribes medication, you must notify the Supervisor in writing, before starting your shift. Notification includes dose amount and the length of time you will be medicated.

2. No driver shall allow anyone other than THE COMPANY employees who are on duty to ride on any truck, except by written authorization of the employer or in case of an emergency arising out of disabled commercial equipment or an act of God.

3. Failure to report all incidents involving other vehicles, personal injury and/or property damage, spillage, and contaminations from the scene of the incident or the nearest available telephone is subject to disciplinary action up to and including termination.

4. Leaving the motor vehicle unattended during the process of loading or unloading is subject to disciplinary action up to and including termination.

5. Failure to wear safety clothing or use other safety equipment, including safety glasses, when required will result in strict disciplinary action.

6. Failure to comply with any rule of the Federal Department of Transportation or failure to comply with any posted state, county, city or local regulations, where such posting is visible by the driver will be subject to disciplinary action up to and including termination.

7. The maximum speed limit will be the legal posted speed limit. When highway, weather and/or traffic conditions warrant lower speed, no driver shall drive a vehicle at a speed greater than is reasonable and prudent under the existing conditions. The use or possession of radar detectors in a company vehicle is strictly prohibited.

PART V
PAPERWORK

A. DRIVER PAPERWORK

Use of Truck/Vehicle Inspection Reports: A driver is required by the DOT to fill out a "Driver's Vehicle Inspection Report" every day.

This report shall be filled out during the daily truck inspections, noting any defects. Turn in the white/yellow copies from your pre and post-trip inspections to the maintenance box in the pump house. The mechanic will return the yellow copies to the Transportation Manager/Dispatcher with the noted defects shown as corrected. The pink copy stays in the truck.

1. It is the driver's responsibility to ensure he or she has enough manifests/invoices to cover each pick up and call-ins for that day. (Reference HWI-030 and follow completely). Drivers will only handwrite a manifest after receiving approval from the Supervisor. This must be noted on the bottom of the manifest in the comment section.

2. A new Truck Report form will be used each day. The driver will provide all information requested on the form.

3. Any missing fittings will be noted on the form before leaving.

4. Whether or not there are problems to report, the driver signs the Vehicle Inspection Report form on the line marked, "Driver=s Signature", and checks the appropriate box.

5. Maintenance reviews the discrepancy list and determines those needing immediate work before operations can continue.

6. Work is performed immediately or the mechanic advises the Supervisor how long the unit will be out of service.

7. Once work is complete, a Maintenance Representative signs off, stating that defects are corrected and returns the yellow copy, with his completed work order to the Supervisor.

8. If no action is required by maintenance, the mechanic will sign the form and return the yellow copy to the Supervisor for a signature. This dually signed form is to be kept on file for three months (to comply with DOT regulations).

Before starting a trip, tractor trailer, vac truck, and haz-mat drivers shall have the following:

a. Driver's Daily Trip Report: This report outlines the driver day start and finish times, mileage and standby times.

b. Work Order Form (green copy) if applicable: This report explains what to do, where to go, and special equipment needed.

c. Manifest/Invoice: This form is required by the DOT. It indicates the customer, EPA number, number of gallons and product being transported. **These forms are to be**

returned daily to the office. No one should be in possession of these forms unless they are on-duty, as they are the property of HOWCO Environmental Services.

B. EXPENSE REPORTS

All drivers shall have the following:

1. All original receipts shall be turned in, within 5 days of the receipt, to the Supervisor, for reimbursement. If not turned in within 5 days, it may be reimbursed. Receipts without the required information will not be reimbursed.

2. Mileage shall be recorded, in miles driven, only if the driver is asked to use his or her personal vehicle to conduct company business. This does not include driving to and from a job site or work. The money due is recorded in the last column. Multiply the total number of miles driven by the Company authorized amount.

3. Receipts: All purchases for the Company must accompany a receipt to be eligible for reimbursement. The receipts shall, at a minimum, show:

    a. The name and address of the seller (store).

    b. Our Company name.

    c. Product(s) purchased; if fuel, you must show what kind of fuel and gallons purchased.

    d. Date of purchase.

    e. Dollar amount purchased.

C. DAILY RECEIVING REPORT

1. Used before the driver has unloaded the vehicle.

2. Complete a yard receiving report (SOP908/01) for the drum truck or a plant receiving report (SOP908/02) for recovery and vac trucks, obtained from operation's pump operator. Manifest numbers on drums must match those listed on the receiving report. Manifest numbers for public drop offs must be listed on the plant receiving report as well.

3. This form tells the operator what product you are carrying and the volume. At this time, you will be instructed where to unload your products.

D. CREDIT POLICY

1. All new accounts must be C.O.D. for first pump, courtesy pumps, and prior credit approvals excluded. This will be noted on the first Manifest for that customer. The driver must collect for any chargeable product, at the time of the first pickup.

2. After the first pump, all accounts will have an automatic credit limit of $250.00 unless the following applies:

   a. Customers on stop list.

   b. Notation on manifest with instructions to collect charges.

   c. Drivers must obtain approval in advance if charges are to exceed $250.00.

   d. Stop list customers must be collected unless approved by the Accounting Department management personnel.

NOTE: If a driver services a customer, without proper approval, who has chargeable product and is on the Stop List, that driver shall be held responsible for those charges.

PART VI
IF YOU HAVE AN ACCIDENT

A. KEEP AN ACCIDENT FROM GETTING WORSE

Remain calm. Take every precaution possible to remove the danger of anyone else becoming involved. You shall get the reflectors out as quickly as possible, but in any case within ten minutes and place the warning devices in accordance with Subpart C-392.22 of the Fleet Safety Compliance Manual.

B. NOTIFICATION

1. Send for help immediately if injuries have occurred. Call "911".

2. Give complete and detailed information.

3. Notify your Supervisor. If your Supervisor is not available then call: (1-800-435-8467).

Under no circumstances should you leave the scene. Ask for assistance from passing motorists to make calls for you and ask witnesses to remain on the scene. If a witness does not wish to stay, obtain their statement, name, address, phone number, and signature.

C. CARE FOR THE INJURED

The most important thing to remember, if someone is injured, is not to allow anyone to move that person.

Make the injured person as comfortable as possible until an ambulance arrives. If necessary, ask someone to stand watch over the injured person and keep people from crowding around.

D. WITNESSES

You should get as many witnesses as possible. All too often, drivers come back and say there were no witnesses. There is always one witness - the other person. Please, get their name, address, and telephone number. This information can be documented, using the Incident Kit.

If there were no other eyewitnesses, get the names of the first people to arrive on the scene. Their observations may be valuable. They can state how the vehicles were positioned immediately following the accident. Be sure to get the name of anyone taking pictures.

E. STATEMENTS

The law requires you to show your driver's license to the other party in an accident. You do not have to give out any other information except to the investigating officer. Make no statements to anyone else.

F. ACCIDENT REPORT KIT (see sample included in FORMS section)

While you are on the accident scene, be sure to write down information you will need in reporting the accident. This is time, place, make and license number of other vehicle, names of investigating officer, name of other party, etc.

When you make your report, be honest and truthful. It is a mistake to try to escape blame by making false statements. Be as detailed as possible in your report. Sometimes seemingly insignificant facts can make a big difference.

REMEMBER: YOU ARE NOT TO BE RE-DISPATCHED UNTIL THE ACCIDENT REPORT IS COMPLETE.

The driver shall be sent for a drug test and not be dispatched until authorized by your Supervisor.

PART VII
BUREAU OF MOTOR CARRIER
SAFETY REGULATIONS

Outlined below are the BMCS regulations that apply to drivers. They are not complete, but simply highlight some driver responsibilities.

A. HOURS OF SERVICE

Refer to new regulation, Robert to specify maximum hours.

B. TANKER TRAILER SPOTTING

It is the driver's responsibility to ensure tanker trailers are spotted and supported safely and completely. Use the following rules to do so:

1. No trailer will be dropped in any area that will not support the trailer completely and safely.

2. Drivers will take all precautions so that under no circumstances will any damage occur to our equipment.

3. You must be assured that the proper equipment is on the job site to ensure that no damage will occur to the trailer in any way.

4. Chocks, landing gear pads and trailer stands must be used on all trailers spotted off HOWCO property. No exceptions.

5. If there are any questions concerning the correct procedure and/or any deviation from the correct procedure, you are to clear this with your Supervisor before you comply with the customer's wishes.

C. RECORD OF VIOLATIONS

Each driver must furnish a list of all violations of Motor Vehicle Traffic Laws and Ordinances (other than violations involving only parking) of which the driver has been convicted or because of which he has forfeited bond or collateral during the preceding twelve months. This list must be furnished annually, before January 31st, in accordance with Section 391.27 of the Motor Carrier Safety Regulations.

D. PHYSICAL EXAMINATIONS

Drivers shall be tested in accordance with Motor Carrier Safety Regulations (Part 40, Subpart 391.105) at least once every two years commencing with the driver's first examination required under 391.45. It is the driver's responsibility to keep his medical card up-to-date and notify the Supervisor thirty (30) days prior to expiration. Drivers that do not comply shall be subject to disciplinary action.

PART VIII
MISCELLANEOUS

A. FUELING UP

Be sure to check your fuel level during your pre-trip. Fuel will be purchased with your assigned Fuel Card. Record the number of gallons in the upper right-hand corner of your truck report. Fuel tanks should never be filled to the brim; you should leave room for expansion. Trucks shall be fueled at the end of the working day.

B. UNITS NOT TO BE PUSHED

Bumpers on Company units are not designed to be pushed or pulled on. The units must be towed. If your unit becomes immoveable, call the Supervisor. Assistance will be arranged for you.

C. REIMBURSEMENTS TO THE COMPANY

By accepting employment with the Company and signing for receipt of this handbook, you agree that any amount you owe the Company at the time you leave its employ, including amounts owed for accident damage, contaminations, spillage, etc., may be deducted by the Company from any pay or other compensation due to you.

D. TOOLS, FITTINGS, AND HOSES

Truck equipment will be assigned to each unit and will be inventoried on a spot check basis. If any truck's assigned equipment is missing, the driver who pulled the last load with the equipment may be charged for the equipment missing.
It is the driver's responsibility to inspect and insure that the following equipment is available on the truck, before starting the workday.

Equipment Issued to Units:

1 First Aid Kit
1 Fire Extinguisher
1 Set Emergency Triangles
1 Spill Kit, containing:
- 1 Foldable shovel
- 1 5 Gallon Bucket
- 1 Bag of Absorbent, granular
- 12 Absorbent Pads, minimum

1 13@ x 42" Closed End Barrel Wand
1 Twelve Foot 1 - 1/4" Slot Closed End Wand
1 Five Foot 3/4" Closed End Wand
1 Eight Foot 1 1/4" Closed End Wand

Drivers are also issued a variety of Company Property and equipment. When you receive the property and/or equipment drivers shall sign and date the COMPANY PROPERTY/ EQUIPMENT ISSUED form.

The responsibility for this equipment is totally yours. Any item missing or requiring replacement will be charged to you. Your compliance concerning our equipment policies is required.

Company provided tools, include:

1 Bung wrench
1 $^{11}/_{16}$" Socket
1 ¾" Ratchet
1 Hammer
1 15' Tape measure, 1" or wider
1 12" Pipe wrench
1 Air impact wrench, if applicable
1 Tool box

These tools will be issued to individual drivers. It is the driver's responsibility to replace any lost items. If items are broken, take them to your Supervisor, to be replaced.
Periodic audits will be performed. Missing items will be replaced at the driver's expense.

E. DRIVER RESPONSIBILITY FOR OVERLOADS (OVERWEIGHS)

Drivers who load their own vehicle shall be responsible for any overweight citation received, regardless of circumstances.

ATTACHMENTS

LIST OF FORMS AND SAMPLES

- Physical Examination Form
- Vehicle Inspection Report
- Truck Report (Receiving Report)
- Drivers' Daily Trip Report
- Travel Expense Statement
- Motor Carrier Accident Report (Accident Kit)
- Accident Spill Report/Incident Report
- Information on Discharge
- Company Property/Equipment Issued
- HWI – 030
- HOWCO Manifest

REFERENCE MATERIAL

Federal Motor Carrier Safety Regulations Pocketbook

Pocket Guide to Hazardous Materials

Emergency Response Guidebook

Florida Department of Transportation Trucking Manual

UAUOS Transporter Certification Manual

THIS IS AN ACTUAL TRUE OFFICIAL PROCEDURE AND SHALL BE FOLLOWED AS WRITTEN.

Purpose:

The purpose of this procedure is to identify and assign responsibility to ensure that manifests are filled out completely accurately.

Procedure:

The following procedure is numbered sequentially to follow the attached Certified Manifest/ Invoice.

Account Number and Route Information
If the Manifest/Invoice is pre-printed, it is computer generated by the Customer Service Department. If the Manifest/Inv is a blank, it is the Driver=s responsibility to fill in the account number and route information following information recei from the Customer Service Department.

Bill To
This information must include Customer Name, Address, City, State, Zip Code and Phone Number. If the Manifest/Inv is pre-printed, it is computer generated by the Customer Service Department. If the Manifest/Invoice is blank, the Dr shall fill in all of the required information.

Generator/Customer
This information must include Customer Name, Address, City, State, Zip Code, Phone Number and Contact Person. If Manifest/Invoice is pre-printed, it is computer generated by the Customer Service Department. If the Manifest/Invoi blank, the Driver shall fill in all of the required information including a contact name. NOTE: If the Bill To informati exactly the same as the Generator, it is acceptable for the Driver to write "SAME".

Units
The Driver shall identify the units for each description, i.e., gallons, drums, etc. This information shall be entered in the b that corresponds to the appropriate materials that are collected.

Estimated Quantity
In all cases the Drivers shall complete this section. All quantities shall be in gallons or drums. Recovery/drum truck dr shall record actual quantities on all product.

Actual Quantity
The Accounting Department shall fill in the actual quantity. Recovery/drum truck driver shall record actual quantities on product.

Unit Price

If the Manifest/Invoice is pre-printed, it is computer generated by the Customer Service Department. If the Manifest/Invoice is handwritten by the Driver, he/she shall fill in the unit price. No pricing shall be included on any Manifests for Brokered accounts.

Total Price
The Accounting Department and/or Transportation Department personnel shall fill in the actual quantity.
NOTE: Tractor Trailer drivers and Vacuum Truck technicians are not included in this step. No pricing shall be included on any manifests for Brokered accounts.

Total Recovery
The Driver shall add the product gallons in Estimated Quantity, The Actual Quantity, Unit Price and Total Price blocks and record those totals unless the Driver is specifically instructed not to do so by the Accounting Department. Drum truck drivers shall record both the picked up and dropped off totals, i.e., 2/4, 1/1, etc). NOTE: Tractor Trailer drivers and Vacuum Truck technicians are not included in this step. The driver of Unit 3 shall record the drum total on the line above the Total line block by writing "Total Drums" indicating the quantity as stated above.

Arrival Time
The Driver shall always fill in the arrival time.

Departure Time
The Driver shall always fill in the departure time.

Cash
The Driver shall provide the dollar amount of cash received. NOTE: If Not Applicable, the Driver must indicate by "N/A"

Charge
The driver shall provide this information indicated by a check mark. NOTE: If Not Applicable, the Driver must indicate b "N/A".

Check No.
If the Customer is paying by check, the Driver shall record the check number. NOTE: If Not Applicable, the Driver mus indicate by "N/A".

C.O.D.
If the Manifest/Invoice is pre-printed, it is computer generated by the Customer Service Department indicated by open (okay to pick up) or stop (no service unless approved by the Accounting Department). If the Manifest/Invoice is handwritten the Driver will be so directed as to the status of that particular Customer. If it is to be C.O.D., a check mark in this block is acceptable with the dollar amount indicated in No. 12.
NOTE: The C.O.D. monies shall be collected by the driver and turned in to the Accounting Department.

P.O. Required
If the Manifest/Invoice is pre-printed, it is computer generated by the Customer Service Department. If the Manifest/Invoic is handwritten by the Driver, Customer Service will have the Driver indicate this information by a "Y" or "N".

Customer P.O. Number

If the Manifest/Invoice is pre-printed, it is computer generated by the Customer Service Department. If the Manifest/Invoice is handwritten by the Driver, and a P.O. Number is required, the Driver must indicate the P.O. Number in block 17 and attach the actual P.O. from the Customer to the Manifest/Invoice. NOTE: If Not Applicable, the Driver must indicate by "N/A".

Driver's Signature
The Drivers signature and employee number shall be entered.

Date
The Driver shall enter the date.

Truck/Trailer #
The Driver shall write in the proper truck/trailer number.

Per
The Driver shall make every attempt to obtain the Customer Signature.

Oil Filter Drums to be Serviced
The driver shall indicate how many drums need to be serviced.

Comments

If the Manifest/Invoice is pre-printed, any comments necessary will be computer generated by the Customer Service Department. If an extra technician is required for the job, Customer Service will leav space for the extra technician to sign off on the Manifest. The Driver may write any comments necessary in this section also. If a Driver physically arrives at a site where there are charges (specifically the $25.00 call-in charge) and the Customer tells the Driver he has decided to wait, the Driver shall collect the call-in charge for going to the site. If the Driver calls ahead and the client tells him to wait, the Driver may VOID the Manifest/ Invoice and the call-in charge will be waived. If a Work Order is issued for a Manifest, it shall be indicated in this section.

HOWCO Facility Signature (For PCW)
The Plant Operations Manager or the Assistant Manager shall sign.

Receiving Date
The Plant Operations Manager or the Assistant Manager shall sign.

Customer Signature
The Driver shall make every attempt to obtain the Customer Signature. If no one is available, the Driver shall so indicate o the Manifest/Invoice.

Title
The Customer shall enter title. If the customer fails to write in his title, the driver shall ask "what is your title please" and th driver will write in the customer's title.

Date
The Customer shall sign the date he received services.

General

A manifest is a legal document that is required by the Environmental Protection Agency and serves as proof of product collection. This must be maintained for a period of three years.

Manifests are turned in on a daily basis to the Transportation/Accounting Departments

4.3 Upon completion of the manifest turned in by the driver, this becomes a certified document that cannot be altered by anyone other than the Accounting Department.

4.4 No pricing is to be included on Manifests for "Brokered" accounts.

A Brokered account is one where work is done at various sites which are not owned by the "Bill To" company.

All drivers must verify that all copies of the manifest are legible and have clearly transferred through all copies. The driver shall clearly re-write all information on the blue copy of the manifest if it is not legible.

Responsibilities:

Transportation Department
Customer Service
Plant Manager/Supervisor
Accounting Department

Attachment:

Manifest HWI-030/01 - Rev. 0 - 3/6/96