

HOWCO Environmental Services
FLD 152 764 767 92465-HO06-001
Permit Correspondence Page 1 Vol (3-F)

[illegible]

Gephart, Albert

From: Lockett, Laurel [LLockett@CarltonFields.com]
Sent: Wednesday, December 21, 2005 10:53 AM
To: Gephart, Albert
Subject: Howco permit submittal

Thank you for allowing me additional time (until Jan 3) to provide Howco's response on the permit issues that was due on the 23th. I genuinely appreciate your consideration will probably be able to get it to you next week. I have really gotten behind the curve and have family in from out of town. Hope you have a safe and happy holidays!

Laurel Lockett, Esq.
Carlton Fields
Corporate Center Three
4221 W. Boy Scout Boulevard
Tampa, FL 33607-5736
Telephone: (813) 229-4139
Facsimile: (813) 229-4133
llockett@carltonfields.com
<http://www.carltonfields.com>

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12/21/2005

FILE: 3F
27/05

Gephart, Albert

From: rdillen@tampabay.rr.com
Sent: Tuesday, December 13, 2005 4:18 PM
To: Gephart, Albert
Cc: mcammarata@aellab.com
Subject: Re-schedule Annual sampling

Dear Albert,

The annual solid waste sampling event is re-scheduled for Tuesday, December 20th at 09:00 AM.

Samples will be pulled from the Wastewater Treatment Sludge and Oil Extraction Sludge (Tank-110) and analyzed for Full-TCLP parameters, by Advanced Environmental Laboratories, Inc.

Richard.

12/16/2005

FILE: 3-F
26/05



Jeb Bush
Governor

Southwest District
3804 Coconut Palm Drive
Tampa, Florida 33619

Colleen Castille
Secretary

Department of Environmental Protection

DATE: 12-1-05

TIME: 1:00 pm

MEETING: HOWCO WOP REWUIT RENEWAL MEETING

ATTENDEES

Name	Affiliation	Telephone	E-mail
AL BERTHART	FDEP	813-744-6100 x 372	albert@her.state.fl.us
Luba Putcha	FDEP	850-245-8776	Luba.Putcha@dep.state.fl.us
Doug Outlaw	FDEP/Tallahassee	850-245-8786	Douglas.Outlaw@dep.state.fl.us
Richard Dillen	HOWCO ENV. SERV.	727-327-8467	RDILLEN@TAMPABAY.RR.COM
JOHN JONES	Jones Ecosystem Mgmt	(954) 817-2273	john.jones@bellsouth.net
Tim Hagan	Howco Env. Serv.	727-327-8467	THAGAN@TAMPABAY.RR.COM
Michael Wolfe	Howco Env. Serv.	727-327-8467	mike.wolfe@tampabay.fl.com
Tim Drege	FDEP	813-744-6100 x 410	JAMES.DREGE@dep.state.fl.us
Rick Neves	FDEP	850-245-8755	richard.neves@dep.state.fl.us
STEVE MORGAN	FDEP	813-744-6100 x 385	STEVE.MORGAN@dep.state.fl.us

FILE: 3-f 25/05

Gephart, Albert

From: Joseph_Sowers@doh.state.fl.us
Sent: Thursday, September 01, 2005 9:34 PM
To: Dregne, James; Randall_Strauss@doh.state.fl.us
Cc: Ernest_Roggelin@doh.state.fl.us; Lisa_Frazier@doh.state.fl.us; Randolph, Logan; Gephart, Albert
Subject: Re: Howco #8624557

Hello James: There still may be concerns with regard to venting as emergency vent requirements are different depending on what the tank was designed to hold. We would naturally ask the local fire jurisdiction to make that determination.

Joseph Sowers
PST Compliance Program / GIS
Environmental Engineering - PinCHD
joseph_sowers@doh.state.fl.us
727-538-7277 xt. 1133

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

From Blackberry Wireless

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

From: Dregne, James <James.Dregne@dep.state.fl.us>
To: Strauss, Randall <Randall_Strauss@doh.state.fl.us>
CC: Roggelin, Ernest <Ernest_Roggelin@doh.state.fl.us>; Frazier, Lisa <Lisa_Frazier@doh.state.fl.us>; Sowers, Joseph <Joseph_Sowers@doh.state.fl.us>; Randolph, Logan <Logan.Randolph@dep.state.fl.us>; Gephart, Albert <Albert.Gephart@dep.state.fl.us>
Sent: Thu Sep 01 21:24:48 2005
Subject: RE: Howco #8624557

Randy,

This morning I got a call from Mike Wolfe, HOWCO V.P., reference this same subject. After consultation with Al Gephart, our permitting engineer, and Logan Randolph, Storage Tanks Section, I told Mike Wolfe the following: first, his Used Oil Processing Permit allows him to change the product in Tank No. 128R1 as long as he notifies the Department what he is doing; secondly, that if the tank in question is registered with the State to hold a petroleum product, that he only needs to submit a registration change to Tallahassee. Logan said that if the tank was already registered, that HOWCO didn't need to have the tank inspected or pay any additional registration fee. They only needed to notify Tallahassee.

At one point in our discussion, Mike Wolfe expressed an interest in converting his antifreeze tank to diesel, but I told him since that was not a registered tank, that it would first have to be inspected and registered. Logan agreed. That is when he changed his plans to Tank No. 128R1. This plan is all contingent on HOWCO being able to find some diesel fuel to put in the tank.

The only details I have found so far on this tank is the size of the tank, 19,850 gallons. I did find in the permit that there seemed to be a mod in the permit in May of 2000 where Tank No. 128R was moved from their Waste Water Treatment Plant to Oil Storage Tank Area 2.

Thanks, Jim

JIM DREGNE
Hazardous Waste Program Manager
Southwest District

9/2/2005

*FILE: 3-f
24/05*

(813)744-6100 x410

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

From: Randall_Strauss@doh.state.fl.us [mailto:Randall_Strauss@doh.state.fl.us]

Sent: Thursday, September 01, 2005 1:39 PM

To: Ernest_Roggelin@doh.state.fl.us; Joseph_Sowers@doh.state.fl.us

Cc: Lisa_Frazier@doh.state.fl.us; Dregne, James

Subject: Howco #8624557

Ernest & Joe,

I think it's been about a year or more now that Howco sent a registration form to DEP and changed a bunch of their tanks to "unregulated" status, either calling them flow-through process tanks, or claimed they contain only PCW and never UO. I didn't agree with most of the changes and tried to straighten it out at the time with Richard Dillen, but he has not responded to my letters and calls after we first discussed the issue.

Today, I received a phone call from someone new working for Dave Roehm asking what they need to do to convert one of the large vertical processed UO storage tanks to diesel for fueling their trucks. I told him we first need to look at which specific tank and whether the shell itself is suitable, before talking about any modifications that might be necessary like emergency venting, filling and dispensing. I told him to see if there are any labels, or any other documentation they may have as to the mfg, UL listing, etc, and submit it to us and we will take a look and let them know if they can go on to the next step of specific modifications to convert the tank.

Besides making you aware of these issues, I want to suggest that Lisa coordinate with one of us to go with her on the TCI so we can make sure and address any of these issues, if need be, with the inspection. As you know, even after you're as familiar as we are with the facility, it can be very confusing to sort out what's what with all the tanks.

Jim – the tank they want to convert is IDed 128R1 in the tank registration records. Do you have any documentation with the permit as to the mfg, model, drawings, etc, of this tank?

Randall H Strauss

Pinellas Co Health Dept

Environmental Engineering Div

4175 East Bay Dr Suite 300

Clearwater FL 33764

Voice (727)538-7277 x1144

Fax (727)538-7293

randall_strauss@doh.state.fl.us

9/2/2005



Jeb Bush
Governor

Department of Environmental Protection

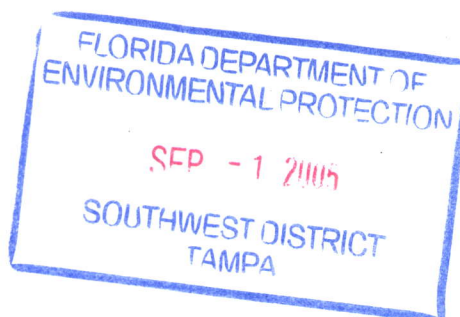
Twin Towers Office Building
2600 Blair Stone Road
Tallahassee, Florida 32399-2400

Colleen M. Castille
Secretary

August 26, 2005

Certified Return Receipt Requested
7003 2260 0006 0109 3616

Mr. Tim Hagan, President
Hagan Holding Co. (HOWCO)
3701 Central Ave.
St. Petersburg, Florida 33717



Subject: Hagan Holding Co. (HOWCO)
EPA ID: FLD 152 764 767
Used Oil Facility Closure Cost Estimates and Financial Assurance

Dear Mr. Hagan:

In accordance with Rule 62-710.800, Florida Administrative Code (F.A.C.) permits for Used Oil Processing Facilities must now provide financial assurance sufficient to cover the cost of closing the facility. This requirement is in two parts.

First, a Used Oil Facility Closing Cost Estimate Form (Form 62-710.901(7)) must be completed (in accordance with the provisions of the facility closing plan described in the company's Used Oil Processing Permit Application), signed, and submitted to the Department's Used Oil Permit Coordinator no later than December 9, 2005. The Used Oil Permit Coordinator will notify the applicant when the closing cost estimate is approved.

Second, within 60 days of receiving approval of the cost estimate from the Used Oil Permit Coordinator, the owner/operator shall submit proof of financial assurance sufficient to cover the estimated closing cost, using any of the tools allowed under 62-710.800(6), to Solid Waste Financial Coordinator.

Also note that the closing cost estimate must be annually adjusted for inflation in accordance with the provisions of this Rule.

All used oil processors must comply with this Rule by the dates specified. As this is a Rule requirement, there is no fee associated with this provision outside of any applicable permit or permit renewal fee.

"More Protection, Less Process"

Printed on recycled paper.

FILE: 3-f
23/05

2/1

Tim Hagan
August 26, 2005
Page Two

If you have any questions regarding this issue, please feel free to contact the Used Oil Permit Coordinator, Bheem Kothur, at (850) 245-8781.

Sincerely,

A handwritten signature in black ink, appearing to read 'TJBh', is positioned above the typed name.

Tim J. Bahr, Administrator
Hazardous Waste Regulation

TB/kt

Enclosure

cc: Raoul Clarke/Tallahassee
Fred Wick/Tallahassee
✓ Augusta Posner/Tallahassee
Bill Kutash/SW District



Department of Environmental Protection

Jeb Bush
Governor

Southwest District
3804 Coconut Palm Drive
Tampa, Florida 33619

Colleen M. Castille
Secretary

Mr. Tim Hagan, President
Hagan Holding Company dba HOWCO Environmental Services
3701 Central Avenue
St. Petersburg, Florida 33713

May 9, 2005

RE: HOWCO Environmental Services Solid Waste Processing Facility
Financial Assurance Cost Estimates
Permit No.: 92465-HO06-001, Pinellas County

Dear Mr. Hagan:

This letter is to acknowledge receipt of the inflation-adjusted cost estimates dated February 7, 2005 (received March 25, 2005), for closing of the HOWCO Environmental Services Solid Waste Processing Facility. The inflation-adjusted cost estimates received March 25, 2005 (total for closure \$64,883.72), are **APPROVED for 2005**. The approved estimates are for a total of approximately 22,000 gallons of material at the site at any time. The next annual update (revised or inflation-adjusted estimates) is due no later than March 1, 2006.

A copy of these estimates will be forwarded to Mr. Fred Wick, Solid Waste Section, FDEP, 2600 Blair Stone Road, Tallahassee, Florida 32399-2407. Please work with him directly to assess the facility's compliance with the funding mechanism requirements of Rule 62-701.630, F.A.C. If you have any questions, you may contact me at (813) 744-6100 ext. 385.

Sincerely,



Steven G. Morgan
Solid Waste Section
Southwest District

sgm

cc: Deb Bush, Pinellas County SW, 3095 114th Ave. N. St. Petersburg, FL 33716
Fred Wick, FDEP, Tallahassee, w/attachment
Al Gephart, FDEP Tampa
Susan Pelz, P.E., FDEP Tampa

Memorandum

Florida Department of Environmental Protection

TO: Subra Putcha
Systems Project Manager

THRU: Bheem Kothur, PE II, Waste Management, Tallahassee
~~Bill Kutash, Program Administrator, Waste Management, SWD~~
~~Jim Dregne, Hazardous Waste Program Manager, SWD~~ *8/8*

FROM: *AG* Al Gephart, Engineering Specialist IV
Hazardous Waste Section, SWD

DATE: August 8, 2005

SUBJECT: *HOWCO Environmental Services EPA ID# FLD 152 764 767*
Southwest District Comments on HOWCO Permit Renewal Application
(Dated July 5, 2005)

Attached are comments from the District on the referenced document and a completed "Used Oil Processing Facility Permit Application Checklist".

Should you have any comments, please contact Al Gephart (813-744-6100 Ext. 372).

File: 3-f
23/05

HOWCO Permit Renewal Application July 15, 2005

SWD Hazardous Waste Section Comments*

GENERAL

If the renewal application is to be a "stand-alone" document, not pages to be inserted into the previous application, there are several items missing. Please submit the following: Emergency Containment #1 (Drawing D-6-1), Emergency Containment #1,2 and 3 (Figure D-6-2), Process and Equipment Storage Plan (Drawing D-8-1), Sampling Locations For Closure (Drawing 10-1), Traffic Routing, Fire Protection Equipment and Escape and Evacuation Routes (Drawing D-8-2).

Please provide a Table of Contents.

Please revise the Revision Numbers to be consistent. There are pages with revision number mw1 and some with revision 0, both having the same date.

APPLICATION FORM, PART 1

Part I, A, page 8, Item #3

Please add to the text that HOWCO is a generator of used oil (vehicle maintenance).

ATTACHMENT #2, DETAILED PROCESS DESCRIPTION

Page 3, 1st paragraph, it is stated that, "the facility receives petroleum product water (PPW)." Please revise the sentence to state that it receives, "petroleum contact water (PCW)."

[FDEP Note: Page 4, 4th paragraph. Ensure that the constituents to be sampled for are listed in the facility's permit.]

[FDEP Note: Page 5. Because much of the text on handling used antifreeze has been deleted, the new permit should restrict HOWCO to 100% recycling of used antifreeze; none of the waste antifreeze would be allowed in HOWCO's processing or wastewater pre-treatment facilities.]

Page 6, Tables 1,2 and 3.

The drawings included in the renewal application do not indicate the location of the three containment areas denoted in the Tables. Please submit facility drawings that depict the location of the containment areas, the dimensions of the containment areas and the dimensions of the tanks within them.

Also, the renewal application does not provide the calculations for determining the capacity of the secondary containment areas. Please submit a set of calculations with the signature and seal of the professional engineer.

ATTACHMENT #3, ANALYSIS PLAN

Page 7, Used Oil, Item #1, Sampling, 2nd sentence. Please re-write the sentence to state, "The bailer and/or caliwsa will be inserted into the bottom of the vehicle or container and"

* These Comments DO NOT Include Those Of The SWD Solid Waste Section.

Page 8, 4th paragraph. Please revise the analysis to reflect the sampling plan agreed to by FDEP and the facility. One batch (tank) of processed used oil is to be tested EVERY TWO WEEKS using the following procedure that randomly selects a sample from one of the ten (10) tanks and tested to determine if it meets the on-spec criteria in 40 CFR 279.11 (Table 1).

One processed used oil sample shall be taken once every two weeks. The sample shall be obtained from one of the ten tanks used to store processed used oil. The dates that the samples will be taken will be determined on the first day of the month by selection on a random basis using Appendix D Random Number Table and Procedure in EPA-600/2-80-018. "Samplers and Sampling Procedures for Hazardous Waste Streams", as referenced by SW-846. On the date the sample is to be collected, the same procedure shall be used to select which tank will be sampled from the population of full tanks at the time of sampling.

Page 8 The renewal application has a section titled, "Incoming non-hazardous solids." Please change the title of this section to, "Incoming Oily Solid Wastes." This section does not apply to solid wastes in the solid waste portion of the permit.

[FDEP Note: Page 9. I don't believe we should accept a "blanket" statement that all generator's solid waste determinations are valid for 5 years.]

ATTACHMENT #4, SOLID WASTE HANDLING

Page 10, "Removal of oily solids from used oil processing." Please revise the 3rd paragraph to state, ".... to be analyzed for TCLP Metals and VOCs."

ATTACHMENT #5, TRACKING PLAN

Page 12. Please revise the paragraphs to include all of the "acceptance" and "delivery" criteria in 40 CFR 279.56.

ATTACHMENT #6, EMERGENCY PREPAREDNESS, PREVENTION & CONTINGENCY PLAN.

Please provide a section for an evacuation plan including activation and an evacuation site diagram depicting exit routes and gathering places for facility personnel.

Please provide a section for a listing of containers/tanks available to hold releases.

Page 14, Item 1.1. Please add the following to the end of the paragraph, "The facility will notify the Department of any refusal by local fire, police and hospital."

Page 15, "Emergency Equipment Available". Please submit a revised, if a revision is necessary, Drawing D-4-1, "Fire Fighting Equipment Location."

Page 17, Section 4.0, lists Richard Dillen as the secondary emergency coordinator OR Tim Hagan. If Tim Hagan is to be listed, please designate him as the third emergency coordinator.

Page 18, Item 6.1, paragraph 1 and Item 6.2, paragraph 1. Please add to the text that the PIC will activate facility emergency alarms and notify facility personnel.

Page 18, Item 6.2. There are two references to an Appendix B (list of local authorities). Please submit a copy of Appendix B and a description and copy of Appendix A. There are no Appendices listed in Attachment 6, "Table of Contents."

Page 19, Item 6.3. There is mention of an Appendix B (list of emergency equipment). This conflicts with the previous section (Item 6.2). See preceding comment. Please resolve this discrepancy and submit a copy of the appendix containing the emergency equipment.

Page 21, Item 8.0. Please include additional text stating that the PIC shall notify the Department when the facility has returned to compliance and prior to resuming operations.

ATTACHMENT #7, UNIT MANAGEMENT DESCRIPTION

Please revise this attachment to address the following:

Personnel are to ensure that used oil containers are properly labeled; and

Provide site diagrams, a listing of tanks and their respective containment areas and the design, dimensions and calculations to support that the secondary containment areas are sufficient.

ATTACHMENT #8, CLOSURE PLAN

Please add a timeline to the Closure Schedule.

Please include a list of tanks, containers, piping and equipment that will be cleaned/closed.

Paragraphs 4 and 5 from the Closure Plan in the 7/21/99 permit application (soil sampling locations) should be included in the 7/15/05 permit application Closure Plan.

Page 25. More detail is needed in the solid waste closure cost estimate. The 7/21/99 permit application has a solid waste closing cost of \$58,760. Please justify why this cost is only \$11,500 in the 7/5/05 permit renewal application.

The Facility should consider submitting a Closure Cost Estimate Form [62-710.901(7)] for the used oil processing portion of the facility since it will be due in December 2005.

ATTACHMENT #9, TRAINING

Please add a section to address employee training for site specific safety and use of emergency equipment.

USED OIL PROCESSING FACILITY PERMIT APPLICATION CHECKLIST

Facility Name HOWCO ENVIRONMENTAL SERVICES Permit Application Number 92465-HO06-002
 Date of Submittal Received July 26, 2005 (LATE) Permit Reviewer's Name Al Gephart

Page/ Paragraph	Review Item	Reference	Complete? Y/N or N/A	Comments
Part I A. General Information				
	New ☐ Renewal ☒		N	Based on the total contents of the renewal application, items noted on this checklist and attached comments.
	Modification ☐		Y	
	Date old permit expires <u>8/3/05</u>		Y	
	Revision Number (date) <u>7/5/05</u>		Y	
	Date current operation began: <u>1972</u>		Y	
	Facility name: <u>Howco Environ. Services</u>		Y	
	EPA identification number: <u>FLD 152 764 767</u>		Y	
	Facility location or street address:		Y	
	Facility mailing address:		Y	
	Contact person information:		Y	
	Operator's name and information:		Y	
	Facility owner's name and information:		Y	
	Legal structure:			
P. 8 Item 12	☒ corporation (state of corporation: <u>FL</u>)		Y	
	☐ individual (name and address of each owner)		N/A	
	☐ partnership (name and address of each owner)		N/A	
	☐ other (specified)		N/A	
	☐ if assumed name, county/state of name registration		N/A	
P. 9 Item 13	Site ownership status		Y	
P. 15	Professional Engineer information: (name, registration number, address)			
	a. certification of secondary containment adequacy (capacity), structural integrity, (structural strength), and underground process piping for storage tanks, process tanks, and container storage		Y	
	b. certification of leak detection.		N/A	
	c. certification of any substantial construction modifications.		N/A	
	d. certification of closure plan.		N/A	
	e. certification of tank design for new or additional tanks		N/A	
P. 15	f. recertification of any of the above		Y	Recertification of all of the above.

Page/ Paragraph	Review Item	Reference	Complete? Y/N or N/A	Comments
C. Operating Information:				
P. 10 Item C.1	1. HW generator status: <u>CESQG</u>		Y	
P. 10 Item C.2	2. Applicable EPA HW codes: <u>D001 / D007 / D008</u>		N	Add D018 (Benzene)
P. 1 paragraph 1 P. 1 and P. 2	3. Brief description of facility operation: nature of business:		Y	
P. 1 paragraph 2	activities to be conducted: number of employees:		Y	
	Attachment Number <u>1</u>		Y	
Pages 3 thru 5	4. Process flow description: Site map showing legal boundaries of facility which includes:		Y	
	a. access control (fences, gates)		N	There is no site map in Attachment #2 and there is no reference to where the site map is located in the application.
	b. buildings and other structures		N	
	c. tanks and containers		N	
	d. loading/unloading areas		N	
	e. drainage or flood control barriers		N	
	f. runoff control system (or refer to stormwater permit)		N	
	Attachment Number <u>2</u>			
Pages 7 thru 9 P. 7	5. a. Analysis Plan. The Plan Includes: i. sampling plan		Y	
P. 8 paragraph 5	ii. fingerprint analysis on incoming shipments		Y	
Pages 10 and 11 P. 10 paragraph 4	iii. representative analysis on outgoing shipment (metal/halogen) Attachment Number <u>3</u>		N	The sampling frequency is not correct and the random sampling method has not been included.
	b. Sludge/Residue/Byproduct Management: The plan includes:			
	i. characterization analysis		Y	
	ii. frequency of sludge removal		N/A	
	Attachment Number <u>4</u>			
P. 12 para 1&3 P. 12 para 1&3	c. Tracking Plan: The plan includes: i. name/address/EPA ID of transporter		N	Some information listed in 40 CFR 279.56 is not stated in the application.
	ii. origin/destination/quantities/dates of all incoming and outgoing shipments		N	
	Attachment Number <u>5</u>			
P. 19 paragraph 5 P. 16 Item 4 P. 20 paragraph 1	6. Preparedness and Prevention Plan: The plan includes: a. communications/alarm system		Y	
	b. ER communication device		Y	
P. 20 paragraph 2	c. Fire/Spill Control equipment		Y	
P. 19 paragraph 4	d. Water at adequate volume/pressure		N	Facility is close to City fire hydrants
	e. emergency equipment testing/maintenance		Y	
	f. com/alarm where used oil handled		Y	

Page/ Paragraph	Review Item	Reference	Complete? Y/N or N/A	Comments
P. 20 paragraph 3	g. proper aisle space for containers/equipment		Y	
P. 14 paragraph 1	h. arrangements with local authorities		Y	
P. 14 paragraph 1	i. arrangements with hospital		Y	
P. 22	j. primary/supporting authorities		Y	
P. 19 paragraph 4	k. State ER teams/contractors/suppliers		Y	
	l. documentation of any refusal		N	Not mentioned in text.
P. 16 paragraph 2	m. corrective actions for spills/leaks		Y	
	Attachment Number <u>6</u>			
	7. Contingency Plan and Emergency Procedures: The plan includes:			
P. 18 Item 6	a. specific actions/procedures to follow		Y	
P. 18 Item 6	b. emergency response arrangements		Y	
P. 17 paragraph 2	c. names/addresses/phone numbers of PICs		Y	
P. 18 Item 6	d. PIC procedure to activate plan		Y	
	e. inventory/location of emergency equipment		N	No list or site location map.
	f. containers/tanks available to hold releases		N	Not provided in Plan.
P. 21 Item 7	g. how equipment replaced/cleaned		Y	
	h. evacuation plan		N	No Evacuation Plan.
P. 14 Item 1.3	i. copies maintained at facility		Y	
P. 21 Item 10	j. amendments when needed		Y	
P. 21 Item 8	k. incident reporting		Y	
	Attachment Number <u>6</u>			
	8. Unit Management: The plan includes:			
	"Used Oil" labeling documentation		N	
	a. For containers:			
P. 23 paragraph 1	i. adequate aisle space		Y	
	ii. adequate secondary containment (design, capacity, specs)		N	Need Figures, Dimensions
P. 23 paragraph 1	iii. inspections		Y	Y and Calculations
P. 23 paragraph 5	iv. corrective actions		Y	
	b. For tanks:			
	i. All aboveground storage and process tanks comply with:		?	
	62-762.500 (Performance Standards for New Storage Tank Systems)			
	62-762.510 (Performance Standards for Existing Shop-Fabricated Tank Systems)			
	62-762.520 (Performance Standards for Existing Field-Erected Tank Systems)			
	62-762.600 (General Release Detection Standards)			
	62-762.700 Repairs to Storage Tank System			

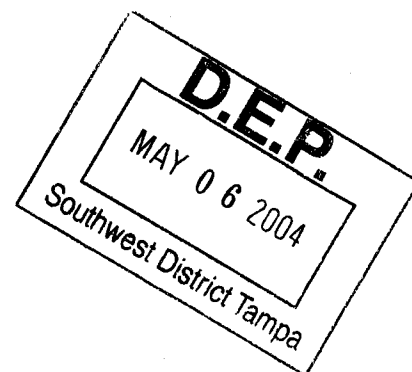
Page/ Paragraph	Review Item	Reference	Complete? Y/N or N/A	Comments
	ii.. All underground storage and process tanks comply with: 62-761.500 (Performance Standards for New Storage Tank Systems) 62-761.520 (Performance Standards for Other Existing Petroleum and Petroleum Product Storage Systems: Non-vehicular fuels) 62-761.600 (General Release Detection Standards) 62-761.620 (Release Detection Standards for Other Regulated Substance Tanks) 62-761.630 (Release Detection Standards for Integral Piping) 62-761.700 (Repairs to Storage Tank Systems)			
	iii. Storage and process tank closure plan which complies with: 62-761.800 (Underground Storage Tank Systems: Out-of-Service and Closure Requirements) 62-762.800 (Aboveground Storage Tank Systems: Out-of-Service and Closure Requirements)			
	iv. Storage and process tank inspection and monitoring plan complies with: 62-761.600 (Underground Storage Tank Systems: General Release Detection Standards) 62-762.600 (Aboveground Storage Tank Systems: General Release Detection Standards)		Y	
P. 23 paragraph 5	c. A plan for removal of released material and accumulated precipitation from secondary containment Attachment Number <u>7</u>		Y	
P. 25 paragraph 4	9. Closure Plan The plan includes: a. closure schedule		Y	Doesn't include timeline.
P. 25 paragraph 1	b. listing of tanks, containers, pipes, equipment that will be cleaned/closed		N	Need to create or reference a listing.
P. 24 para 2 thru 6	c. procedures for decontamination of tanks, containers, equipment and other process area		Y	
P. 25 para 1&2	d. listing and justification of sampling methods (including # of samples), sampling parameters, and analytical methods in accordance with SW-846 or equivalent.		Y	
P. 25 paragraph 2	e. description of characterization and disposal of rinsewaters and residues generated from clean-up and closure activities		Y	
P. 24 para 2&3	f. description of characterization and disposal of solid wastes generated from clean-up and closure activities.		Y	
P. 24 paragraph 4	g. description of soil sampling near secondary containment.		Y	
P. 24 paragraph 6	i. description of how, if soil is contaminated, the groundwater will be sampled. ii. description of how, if groundwater is contaminated, the facility will meet closure requirements of 40 CFR 265.310, Closure and Post-Closure Permit Attachment Number <u>8</u>		Y	

Page/ Paragraph	Review Item	Reference	Complete? Y/N or N/A	Comments
P. 27 paragraph 1	10. Employee Training Program: The program includes: a. documents describing the methods and/or materials used to familiarize employees with all state and federal rules and regulations. b. method of documentation used to demonstrate that employees have been trained to use emergency equipment.		Y	
P. 27 paragraph 3	c. description of how employee education program is updated to address changes in applicable regulations or facility operations. Attachment Number <u>9</u>		N	There is no mention of site specific emergency training.
P. 12	Part II - Certification (Certifications must contain the original signatures - no copies)			
P. 13	1. Facility Operator Certification [Form 62-710.901(a)]		Y	Owner Certification does not include facility name, EPA ID#, name is not printed and date and phone # not included.
P. 14	2. Facility Owner Certification [Form 62-710.901(b)]		Y	
P. 15	3. Land Owner Certification [Form 62-710.901(c)]		Y	
	4. Professional Engineer Certification [Form 62-710.901(d)] Seal affixed		Y	

HOWCO Environmental Services

May 5, 2004

Solid Waste Section Manager
c/o Mrs. Susan J. Pelz
Florida Dept. of Environmental Protection
Southwest District
3804 Coconut Palm Drive
Tampa, FL 33619



Re: Permit #92465-HO06-001
Results of "WWTS" testing

Dear Mrs. Pelz,

Please find enclosed copies of the additional Full-TCLP analyses on two consecutive batches of Waste Water Treatment Sludge (WWTS), per Specific Condition IV.4.c(5). The results of both batches show that the concentrations of all parameters are below toxic contaminant Regulatory Levels.

If you have any questions, please do not hesitate to contact me at 727-328-7403, ext. 347.

Sincerely,

A handwritten signature in black ink, appearing to read "RDillen", written over a horizontal line.

Richard Dillen
Quality Assurance Officer

cc: Mr. Stanley C. Tam, FDEP-Tampa (w/Attachment)
Mr. Bill K. Parker, DEP-Tallahassee (w/Attachment)
File (w/Attachment)



**Advanced
Environmental Laboratories, Inc.**

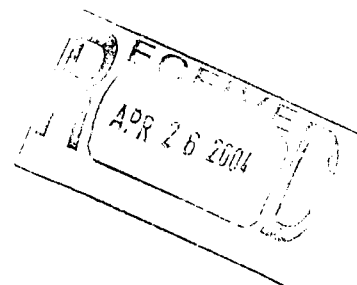
9610 Princess Palm Avenue
Tampa, Florida 33619
(813) 630-9616
FAX (813) 630-4327

Client: Howco, Inc.
Project Name: Annual Compliance
Project Number: 31483

Report No.: T043005
Date Sampled: 3/26/04
Date Received: 3/26/04 12:40
Date Reported: 4/21/04

Attention: Richard Dillen
Phone Number: 727-328-7403
Address: 3701 Central Ave.

St. Petersburg, FL 33713



Project Description

The analytical results for the samples contained in this report were submitted for analysis as outlined by the Chain of Custody.

Project Name: Annual Compliance

Approved By:

Nissa Mulnick, QA Deputy

If you have any questions, the above named should be contacted.

Advanced Environmental Laboratories certifies that the test results in this report meet all requirements of the NELAC standards, unless notated otherwise in the body of the report.

Total Number of Pages = 16

Advanced Environmental Laboratories, Inc.

Analytical Report

Client: Howco, Inc.

Report No.: T043005

Project Name: Annual Compliance

Date/Time Received: 3/26/04 12:40

Lab Code: T043005-01

Date/Time Sampled: 3/26/04 9:30

Client Sample ID: WWTS

Sample Type:

Site: Howco

Sampled By: James Jones

Matrix: Soil

Sampling Method: G

Shipping Method: AEL Pick-up

TCLP Metals

Analytes: <i>mg/l</i>	Dilution	Adjusted MDL	Adjusted PQL	Results	Units	Qualifier(s)	Method	Parameter Comment	Lab
Arsenic <i>5</i>	1	0.041	0.16	0.041	mg/L	U	SW6010B		J
Barium <i>100</i>	1	0.0023	0.0092	0.068	mg/L		SW6010B		J
Cadmium <i>1</i>	1	0.00057	0.0023	0.00057	mg/L	U	SW6010B		J
Chromium <i>5</i>	1	0.0018	0.0072	0.0020	mg/L	i	SW6010B		J
Lead <i>5</i>	1	0.0067	0.027	0.0067	mg/L	U	SW6010B		J
Selenium <i>1</i>	1	0.044	0.18	0.044	mg/L	U	SW6010B		J
Silver <i>5</i>	1	0.019	0.076	0.019	mg/L	U	SW6010B		J

TCLP Metals (Hg)

Analytes: <i>mg/l</i>	Dilution	Adjusted MDL	Adjusted PQL	Results	Units	Qualifier(s)	Method	Parameter Comment	Lab
Mercury <i>0.2</i>	1	0.00033	0.0013	0.00033	mg/L	U	SW7470A		J

TCLP Pesticides

Analytes: <i>mg/l</i>	Dilution	Adjusted MDL	Adjusted PQL	Results	Units	Qualifier(s)	Method	Parameter Comment	Lab
Chlordane <i>0.03</i>	10	2.0	7.8	2.0	ug/L	U	SW8081A		J
Endrin	10	0.14	0.56	0.14	ug/L	U	SW8081A		J
Gamma-BHC (Lindane)	10	0.060	0.24	0.060	ug/L	U	SW8081A		J
Heptachlor <i>0.008</i>	10	0.63	2.5	0.63	ug/L	U	SW8081A		J
Heptachlor Epoxide <i>0.008</i>	10	0.13	0.52	0.13	ug/L	U	SW8081A		J
Methoxychlor <i>10</i>	10	0.14	0.56	0.14	ug/L	U	SW8081A		J
Toxaphene <i>0.5</i>	10	0.70	2.8	0.70	ug/L	U	SW8081A		J

TCLP Semi-Volatile Organic Compounds

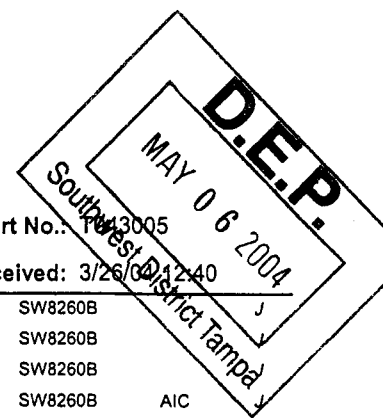
Analytes: <i>mg/l</i>	Dilution	Adjusted MDL	Adjusted PQL	Results	Units	Qualifier(s)	Method	Parameter Comment	Lab
1,4-Dichlorobenzene <i>7.5</i>	10	0.029	0.12	0.029	mg/L	U	SW8270C		J
2,4,5-Trichlorophenol <i>400</i>	10	0.035	0.14	0.035	mg/L	U	SW8270C		J
2,4,6-Trichlorophenol <i>2</i>	10	0.022	0.088	0.022	mg/L	U	SW8270C		J
2,4-Dinitrotoluene <i>0.13</i>	10	0.0094	0.038	0.0094	mg/L	U	SW8270C		J
Cresols, Total <i>200</i>	10	0.085	0.34	0.085	mg/L	U	SW8270C		J
Hexachlorobenzene <i>0.13</i>	10	0.018	0.070	0.018	mg/L	U	SW8270C		J
Hexachlorobutadiene <i>0.5</i>	10	0.021	0.084	0.021	mg/L	U	SW8270C		J
Hexachloroethane <i>3.0</i>	10	0.028	0.11	0.028	mg/L	U	SW8270C		J
Nitrobenzene <i>2.0</i>	10	0.010	0.040	0.010	mg/L	U	SW8270C		J
Pentachlorophenol <i>100</i>	10	0.032	0.13	0.032	mg/L	U	SW8270C		J
Pyridine <i>5</i>	10	0.018	0.074	0.018	mg/L	U	SW8270C		J

TCLP Volatile Organics

Analytes:	Dilution	Adjusted MDL	Adjusted PQL	Results	Units	Qualifier(s)	Method	Parameter Comment	Lab
1,1-Dichloroethene <i>0.7</i>	10	0.0050	0.020	0.0050	mg/L	U	SW8260B		J
1,2-Dichloroethane <i>0.5</i>	10	0.0036	0.014	0.0036	mg/L	U	SW8260B		J
1,4-Dichlorobenzene <i>7.5</i>	10	0.0030	0.012	0.0030	mg/L	U	SW8260B		J
Benzene <i>0.5</i>	10	0.0030	0.012	0.017	mg/L		SW8260B		J
Carbon Tetrachloride <i>0.5</i>	10	0.0039	0.016	0.0039	mg/L	U	SW8260B		J

Advanced Environmental Laboratories, Inc.

Analytical Report



Client: Howco, Inc.

Report No.: T043005

Project Name: Annual Compliance

Date/Time Received: 3/26/04 12:40

Chlorobenzene	10	0.0031	0.012	0.0031	mg/L	U	SW8260B	J
Chloroform	10	0.0041	0.016	0.0041	mg/L	U	SW8260B	J
Methyl ethyl ketone	10	0.0025	0.010	0.0025	mg/L	U	SW8260B	J
Tetrachloroethene	10	0.0043	0.017	0.014	mg/L	i	SW8260B	AIC
Trichloroethene	10	0.0043	0.017	0.0043	mg/L	U	SW8260B	J
Vinyl Chloride	10	0.0049	0.020	0.0049	mg/L	U	SW8260B	J

Surrogates:	Control Limits	% Recovery	Qual.	Method	Prep Method
Decachlorobiphenyl	30 - 120	53		SW8081A	SW1311/SW3510C
Tetrachloro-m-xylene	30 - 120	105		SW8081A	SW1311/SW3510C
1,2-Dichloroethane-d4	80 - 120	88		SW8260B	SW1311/SW5030B
4-Bromofluorobenzene	86 - 115	98		SW8260B	SW1311/SW5030B
Toluene d(8)	88 - 110	98		SW8260B	SW1311/SW5030B
2,4,6-Tribromophenol	15 - 112	86		SW8270C	SW1311/SW3510C
2-Fluorobiphenyl	20 - 119	84		SW8270C	SW1311/SW3510C
2-Fluorophenol	20 - 119	34		SW8270C	SW1311/SW3510C
Nitrobenzene d5	23 - 120	68		SW8270C	SW1311/SW3510C
p-Terphenyl-d14	18 - 137	82		SW8270C	SW1311/SW3510C
Phenol-d6	18 - 121	22		SW8270C	SW1311/SW3510C

AIC Alternate initial calibration criteria used (mean RSD <15%)

i The reported value is between the laboratory method detection limit and the laboratory practical quantitation limit.

U The compound was analyzed for but not detected.

J DOH certification #E82574 (AEL-JAX) (FL NELAC certification)

* Comment for Arsenic - All results for T043005-01 by SW6010B analyzed 04-06-04 due to reanalysis.

* Comment for Silver - Analyzed 04-08-04 due to reanalysis.

Advanced Environmental Laboratories, Inc.

Analytical Report

Client: Howco, Inc.

Report No.: T043005

Project Name: Annual Compliance

Date/Time Received: 3/26/04 12:40

Sample Cross Reference Information

Lab Code: T043005-01

Site: Howco

Client Sample Number: WWTS

Matrix: Soil

Test Description	Analysis Method	Prep Method	Analytical Batch ID	Analysis Date/Time	Analyst	Prep Batch ID	Prep Date/Time
TCLP Extraction (Non-Volatile)	SW1311	NONE				oe033004ldp	3/30/04 5:00:00
TCLP Extraction (Volatile)	SW1311	NONE				oe033004zhe	3/30/04 5:00:00
TCLP Herbicides	SW8151A	SW1311/METHOD					
TCLP Metals	SW6010B	SW1311/SW3010A	M033104-3010-3	4/2/04 11:48	KC	M033104-3010-3	3/31/04 1:28:00
TCLP Metals (Hg)	SW7470A	SW1311/METHOD	M040604-HG-3	4/6/04 13:03	TP	M040604-HG-3	4/6/04 4:30:00 A
TCLP Pesticides	SW8081A	SW1311/SW3510C	sv040904c-pp	4/9/04 14:38	MP	sv040504-pp	4/5/04 10:30:00
TCLP Semi-Volatile Organic Compounds	SW8270C	SW1311/SW3510C	SV041204L	4/12/04 12:51	JA	sv040604-bna	4/6/04 8:30:00 A
TCLP Volatile Organics	SW8260B	SW1311/SW5030B	V040204A	4/2/04 14:58	BB	V040204A	

If the Analytical Batch ID and Prep Batch ID is null, the analysis was not performed by AEL, and the original report from the subcontracted laboratory will be provided containing this information.

Definitions:

Water matrix refers to all aqueous matrices except drinking water, including but not limited to, wastewater, ground water, surface water, aqueous wastes

Soil matrix refers to all non-aqueous matrices, including soils, solids, sludges, semi-solids, and non-aqueous waste samples

All results in mg/kg or % are reported in dry weight basis, unless noted otherwise. All results in mg/L are reported in wet weight basis.

MDL Method Detection Limit, without correction for dilution or moisture content

Adjusted Reporting Limit is the MDL accounting for all dilutions and moisture content calculations.

PQL is defined to be 4 times the MDL, for all results qualified with an 'I' qualifier.

Sampling Methods; P=Pump, C=Composite, G=Grab

Advanced Environmental Laboratories, Inc.

Analytical Report

Client: Howco, Inc.

Report No.: T043005

Project Name: Annual Compliance

Date/Time Received: 3/26/04 12:40

Quality Assurance Report

Method Blanks

TCLP Metals							
QCBatchID	Analyte	QC Sample Type	Method	MDL	Result	Units	Qualifier
M033104-3010-3	Arsenic	Method Blank	SW6010B	0.041	0.042	mg/L	I
M033104-3010-3	Barium	Method Blank	SW6010B	0.0023	0.0060	mg/L	I
M033104-3010-3	Cadmium	Method Blank	SW6010B	0.00057	0.00057	mg/L	U
M033104-3010-3	Chromium	Method Blank	SW6010B	0.0018	0.0045	mg/L	I
M033104-3010-3	Lead	Method Blank	SW6010B	0.0067	0.0067	mg/L	U
M033104-3010-3	Selenium	Method Blank	SW6010B	0.044	0.044	mg/L	U
M033104-3010-3	Silver	Method Blank	SW6010B	0.019	0.019	mg/L	U

TCLP Metals (Hg)							
QCBatchID	Analyte	QC Sample Type	Method	MDL	Result	Units	Qualifier
M040604-HG-3	Mercury	Method Blank	SW7470A	0.00033	0.00033	mg/L	U

TCLP Pesticides							
QCBatchID	Analyte	QC Sample Type	Method	MDL	Result	Units	Qualifier
sv040904c-pp	Chlordane	Method Blank	SW8081A	0.20	0.20	ug/L	U
sv040904c-pp	Endrin	Method Blank	SW8081A	0.014	0.014	ug/L	U
sv040904c-pp	Gamma-BHC (Lindane)	Method Blank	SW8081A	0.0060	0.0060	ug/L	U
sv040904c-pp	Heptachlor	Method Blank	SW8081A	0.063	0.063	ug/L	U
sv040904c-pp	Heptachlor Epoxide	Method Blank	SW8081A	0.013	0.013	ug/L	U
sv040904c-pp	Methoxychlor	Method Blank	SW8081A	0.014	0.014	ug/L	U
sv040904c-pp	Toxaphene	Method Blank	SW8081A	0.070	0.070	ug/L	U
Surrogate(s)	Result	Units	% Recovery	Qualifier	Acceptance Limits		
Tetrachloro-m-xylene	0.85	ug/L	85		30 - 120		
Decachlorobiphenyl	0.18	ug/L	35		30 - 120		

TCLP Semi-Volatile Organic Compounds							
QCBatchID	Analyte	QC Sample Type	Method	MDL	Result	Units	Qualifier
SV041204L	1,4-Dichlorobenzene	Method Blank	SW8270C	0.0029	0.0029	mg/L	U
SV041204L	2,4,5-Trichlorophenol	Method Blank	SW8270C	0.0035	0.0035	mg/L	U
SV041204L	2,4,6-Trichlorophenol	Method Blank	SW8270C	0.0022	0.0022	mg/L	U
SV041204L	2,4-Dinitrotoluene	Method Blank	SW8270C	0.00094	0.00094	mg/L	U
SV041204L	Cresols, Total	Method Blank	SW8270C	0.0085	0.0085	mg/L	U
SV041204L	Hexachlorobenzene	Method Blank	SW8270C	0.0018	0.0018	mg/L	U
SV041204L	Hexachlorobutadiene	Method Blank	SW8270C	0.0021	0.0021	mg/L	U
SV041204L	Hexachloroethane	Method Blank	SW8270C	0.0028	0.0028	mg/L	U
SV041204L	Nitrobenzene	Method Blank	SW8270C	0.0010	0.0010	mg/L	U
SV041204L	Pentachlorophenol	Method Blank	SW8270C	0.0032	0.0032	mg/L	U
SV041204L	Pyridine	Method Blank	SW8270C	0.0018	0.0018	mg/L	U
Surrogate(s)	Result	Units	% Recovery	Qualifier	Acceptance Limits		
2-Fluorophenol	13	ug/L	26		20 - 119		
Phenol-d6	9.9	ug/L	20		18 - 121		
Nitrobenzene d5	34	ug/L	68		23 - 120		
2-Fluorobiphenyl	41	ug/L	82		20 - 119		
2,4,6-Tribromophenol	35	ug/L	70		15 - 112		
p-Terphenyl-d14	48	ug/L	96		18 - 137		

TCLP Volatile Organics							
QCBatchID	Analyte	QC Sample Type	Method	MDL	Result	Units	Qualifier
V040204A	1,1-Dichloroethene	Method Blank	SW8260B	0.00050	0.00050	mg/L	U
V040204A	1,2-Dichloroethane	Method Blank	SW8260B	0.00036	0.00036	mg/L	U
V040204A	1,4-Dichlorobenzene	Method Blank	SW8260B	0.00030	0.00030	mg/L	U
V040204A	Benzene	Method Blank	SW8260B	0.00030	0.00030	mg/L	U
V040204A	Carbon Tetrachloride	Method Blank	SW8260B	0.00039	0.00039	mg/L	U

Advanced Environmental Laboratories, Inc.
Analytical Report

Client: Howco, Inc.

Report No.: T043005

Project Name: Annual Compliance

Date/Time Received: 3/26/04 12:40

V040204A	Chlorobenzene	Method Blank	SW8260B	0.00031	0.00031	mg/L	U
V040204A	Chloroform	Method Blank	SW8260B	0.00041	0.00041	mg/L	U
V040204A	Methyl ethyl ketone	Method Blank	SW8260B	0.00025	0.00025	mg/L	U
V040204A	Tetrachloroethene	Method Blank	SW8260B	0.00043	0.00043	mg/L	U
V040204A	Trichloroethene	Method Blank	SW8260B	0.00043	0.00043	mg/L	U
V040204A	Vinyl Chloride	Method Blank	SW8260B	0.00049	0.00049	mg/L	U
Surrogate(s)	Result	Units	% Recovery	Qualifier	Acceptance Limits		
1,2-Dichloroethane-d4	59	ug/L	118		80 - 120		
Toluene d(8)	51	ug/L	102		88 - 110		
4-Bromofluorobenzene	54	ug/L	108		86 - 115		

Quality Assurance Qualifiers:

- i The reported value is between the laboratory method detection limit and the laboratory practical quantitation limit.
U The compound was analyzed for but not detected.

The estimated measurements of uncertainty can be provided upon request

This is the last page of the analytical report.



21-APR-04

Advanced Environmental Laboratories, Inc.
6601 Southpoint Pkwy.
Jacksonville, FL 32216
Client Contact: Walter Kronz

Reference: Accura Analytical Laboratory, Inc. (AAL) Work Order No: 5929
Project Name :AEL General Project
Project Number:

Dear Walter Kronz :

We are reporting to you the results of the analyses performed on the samples received under the project name referenced above and identified with the Chain of Custody(s) Numbered NA . All results being reported under this Chain of Custody apply to the samples analyzed and properly identified with an AAL Sample ID number.

All the results for the quality control samples were reviewed. Also, all parameters for data reduction and validation were reviewed. In view of this, we are able to release the analytical data for this report within acceptance criteria for accuracy, precision, completeness or properly flagged.

The validity and integrity of this report will remain intact as long as it is accompanied by this letter and reproduced in full, unless written approval is granted by AAL. This report will be filed for at least 7 years in our archives after which time it will be destroyed without further notice, unless otherwise arranged with you. The samples received, and described as recorded in COC No. NA will be filed for 90 days, and after that time they will be properly disposed without further notice, unless otherwise arranged with you. We reserve the right to return to you any unused samples, extracts or solutions related to them if we consider so necessary (e.g., samples identified as hazardous waste, sample sizes exceeding analytical standard practices, controlled substances under regulated protocols, etc).

We thank you for selecting Accura Analytical Laboratory Inc. to serve your analytical needs. If you have any questions concerning this report, please feel free to contact me at any time.

Sincerely,

David Fuller
Project Manager

6017 Financial Drive Norcross, GA 30071
Phone: 770-449-8800 Fax: 770-449-5477





ACCURA ANALYTICAL LABORATORY, INC. (AAL)
6017 Financial Drive, Norcross, Georgia, 30071, Phone (770) 449-8800
FL Certification #E87429 LA Certification #04079 NC Certification #483
SC Certification #98015 USACE-MRD Approved
Case Narrative

AAL Work Order # 5929

Client Project: none given

Accura Analytical Laboratory Inc. certifies that the results meet all requirements of the NELAC Standards.

The data package includes a 1 page case narrative, 1 report page, 2 QC surrogate recovery pages, 1 QC Blank Spike recovery page, and a list of common EPA qualifier codes.

The following items were noted concerning this work order:

TCLP Herbicides by SW1311/8151A Notations:

1. The blank spike recoveries were outside the laboratory-derived limit. The samples were re-extracted and results were confirmed.

Mei Liang
Mei Liang
PEST/PCB Analyst

April 20, 2004
Date

These Case Narrative Notations have been generated, reviewed, and edited by:

David C. Fuller
David C. Fuller
VP - Client Services

April 21, 2004
Date



Certificate of Analytical Results 5929

Advanced Environmental Laboratories, Inc., Jacksonville, FL

AEL General Project

Sample Id: T043005-1	Matrix: SOIL	% Moisture:
Lab Sample Id: 5929-001	Date Collected: Mar-26-04 09:30	Date Received: Apr-06-04 09:35
Sample Depth:		

Analytical Method: TCLP Herbicides by SW1311/8151A		Prep Method: EXT_SW8151	
Date Analyzed: Apr-14-04 18:17	Analyst: MJL01	Date Prep: Apr-06-04 15:40	Tech: NRO01
Seq Number: 21606			

Parameter	Cas Number	Result	Rep Limit	MDL	Units	Flag	Dil
2,4,5-TP (Silvex)	93-72-1	BRL	0.0040	0.0000025	mg/L		1
2,4-D	94-75-7	BRL	0.0040	0.0000038	mg/L		1

Sample Id: MB-TCLP Extraction Fluid	Matrix: LIQUID	% Moisture:
Lab Sample Id: 5929-002	Date Collected: Mar-30-04 17:00	Date Received: Apr-06-04 09:35
Sample Depth:		

Analytical Method: TCLP Herbicides by SW1311/8151A		Prep Method: EXT_SW8151	
Date Analyzed: Apr-14-04 18:41	Analyst: MJL01	Date Prep: Apr-06-04 15:40	Tech: NRO01
Seq Number: 21606			

Parameter	Cas Number	Result	Rep Limit	MDL	Units	Flag	Dil
2,4,5-TP (Silvex)	93-72-1	BRL	0.0040	0.0000025	mg/L		1
2,4-D	94-75-7	BRL	0.0040	0.0000038	mg/L		1

Sample Id: 18581 BLK	Matrix: WATER	% Moisture:
Lab Sample Id: 18581 BLK	Date Collected:	Date Received:
Sample Depth:		

Analytical Method: TCLP Herbicides by SW1311/8151A		Prep Method: EXT_SW8151	
Date Analyzed: Apr-14-04 14:36	Analyst: MJL01	Date Prep: Apr-06-04 15:40	Tech: NRO01
Seq Number: 21606			

Parameter	Cas Number	Result	Rep Limit	MDL	Units	Flag	Dil
2,4,5-TP (Silvex)	93-72-1	BRL	1.0	0.0010	mg/L		1
2,4-D	94-75-7	BRL	1.0	0.00099	mg/L		1



Form 2 - Surrogate Recoveries

Project Name: AEL General Project

Report Date: 04/21/04 09:25

Work Order #: 5929

Project ID:

Lab Batch #: 21606

Sample: 18581 BLK / BLK

Batch: 1 Matrix: W

Units: mg/L

SURROGATE RECOVERY STUDY					
TCLP Herbicides by SW1311/8151A	Amount Found [A]	True Amount [B]	Recovery %R [D]	Control Limits %R	Flags
Analytes					
2,4-Dichlorophenylacetic Acid	1.929	5.000	39	33-109	

Lab Batch #: 21606

Sample: 18581 BLK / BLK

Batch: 1 Matrix: W

Units: mg/L

SURROGATE RECOVERY STUDY					
TCLP Herbicides by SW1311/8151A	Amount Found [A]	True Amount [B]	Recovery %R [D]	Control Limits %R	Flags
Analytes					
2,4-Dichlorophenylacetic Acid	2.539	5.000	51	33-109	

Lab Batch #: 21606

Sample: 5929-001 / SMP

Batch: 1 Matrix: S

Units: mg/L

SURROGATE RECOVERY STUDY					
TCLP Herbicides by SW1311/8151A	Amount Found [A]	True Amount [B]	Recovery %R [D]	Control Limits %R	Flags
Analytes					
2,4-Dichlorophenylacetic Acid	0.003411	0.01000	34	6-127	

Lab Batch #: 21606

Sample: 5929-001 / SMP

Batch: 1 Matrix: S

Units: mg/L

SURROGATE RECOVERY STUDY					
TCLP Herbicides by SW1311/8151A	Amount Found [A]	True Amount [B]	Recovery %R [D]	Control Limits %R	Flags
Analytes					
2,4-Dichlorophenylacetic Acid	0.002992	0.01000	30	6-127	

Lab Batch #: 21606

Sample: 5929-002 / SMP

Batch: 1 Matrix: S

Units: mg/L

SURROGATE RECOVERY STUDY					
TCLP Herbicides by SW1311/8151A	Amount Found [A]	True Amount [B]	Recovery %R [D]	Control Limits %R	Flags
Analytes					
2,4-Dichlorophenylacetic Acid	0.005267	0.01000	53	6-127	

* Surrogate outside of Laboratory QC limits

** Surrogates outside limits; data and surrogates confirmed by reanalysis

*** Poor recoveries due to dilution

Surrogate Recovery [D] = $100 \cdot A / B$

All results are based on MDL and validated for QC purposes.

Z = Surrogate Recovery exceeded the Laboratory QC limits



Form 2 - Surrogate Recoveries

Project Name: AEL General Project

Report Date: 04/21/04 09:25

Work Order #: 5929

Project ID:

Lab Batch #: 21606

Sample: 5929-002 / SMP

Batch: 1 Matrix: S

Units: mg/L

SURROGATE RECOVERY STUDY					
TCLP Herbicides by SW1311/8151A	Amount Found [A]	True Amount [B]	Recovery %R [D]	Control Limits %R	Flags
Analytes					
2,4-Dichlorophenylacetic Acid	0.006723	0.01000	67	6-127	

* Surrogate outside of Laboratory QC limits
** Surrogates outside limits; data and surrogates confirmed by reanalysis
*** Poor recoveries due to dilution
Surrogate Recovery [D] = $100 \cdot A / B$
All results are based on MDL and validated for QC purposes.
Z = Surrogate Recovery exceeded the Laboratory QC limits



BS / BSD Recoveries

Project Name: AEL General Project

Report Date 04/21/04 09:25

Project ID:

Work Order #: 5929

Lab Batch ID: 21606

Sample: 18581 BKS

Units: mg/L

Batch #: 1

Matrix: W

BLANK /BLANK SPIKE / BLANK SPIKE DUPLICATE RECOVERY STUDY											
Units: mg/L											
TCLP Herbicides by SW1311/8151A Analytes	Blank Sample Result [A]	Spike Added [B]	Blank Spike Result [C]	Blank Spike %R [D]	Spike Added [E]	Blank Spike Duplicate Result [F]	Blk Spk Dup. %R [G]	RPD %	Control Limits %R	Control Limits %RPD	Flag
	<1.0	5.0	<1.0	0	5.0	1.9	38	200	48-109	30	ZF
	<1.0	5.0	<1.0	0	5.0	1.9	38	200	10-129	30	ZF
	2,4,5-TP (Silvex)										
2,4-D											

Lab Batch ID: 21608

Sample: 18614 BKS

Units: mg/L

Batch #: 1

Matrix: W

BLANK /BLANK SPIKE / BLANK SPIKE DUPLICATE RECOVERY STUDY												
Units: mg/L	Analytes	Blank Sample Result [A]	Spike Added [B]	Blank Spike Result [C]	Blank Spike %R [D]	Spike Added [E]	Blank Spike Duplicate Result [F]	Blk. Spk Dup. %R [G]	RPD %	Control Limits %R	Control Limits %RPD	Flag
	2,4,5-TP (Silvex)	<1.0	5.0	2.6	52	5.0	2.6	52	0	48-109	30	
	2,4-D	<1.0	5.0	2.5	50	5.0	2.5	50	0	10-129	30	

Relative Percent Difference RPD = $200 \times [(D-G)/(D+G)]$
Blank Spike Recovery [D] = $100 \times (C)/(B)$
Blank Spike Duplicate Recovery [G] = $100 \times (F)/(E)$
All results are based on MDL and Validated for QC Purposes
F = RPD exceeded the laboratory control limits

Version: 1.5

D.E.P.
MAY 06 2004
Southwest District Tampa



Accura Analytical Laboratory

EPA Defined Qualifiers Codes

- BRL:** This abbreviation indicates that the analytical results were Below the Reporting Limit (BRL).
- U:** The compound was analyzed for but not detected.
- J:** This indicates an estimated value. This flag is used in 3 incidences.
- (1) When estimating a concentration for tentatively identified compounds where 1:1 response is assumed.
 - (2) When the mass spectral and retention time data indicate the presence of a compound that meets the volatile and semivolatile GC/MS identification criteria, and the result is less than the Contract Required Detection Limit (CRDL) – or Reporting Limit - but greater than the MDL.
 - (3) When the retention time data indicate the presence of a compound that meets the pesticide/Aroclor identification criteria, and the result is less than the CRQL – or Reporting Limit- but greater than MDL.
- N:** Indicates presumptive evidence of a compound. This flag is only used for tentatively identified compounds. (TICs), where the identification is based on a mass spectral library search. For generic characterization of a TIC, such as chlorinated hydrocarbon, the "N" flag is not used.
- P:** This is used for a pesticide/Aroclor target analyte when there is greater than 25% difference for detected concentrations between the two GC columns. The lower of the two values is reported and flagged with "P"
- C:** This applies to pesticide result where the identification has been confirmed by GC/MS. Do not apply if this flag if analyte(s) were not confirmed. Used the laboratory-defined flag instead (see the X qualifier).
- B:** This is used when the analyte is found in the associated method blank as well as in the sample. It indicates probable bank contamination and warns the data user to take appropriate action. The flag shall be used for a tentatively identified compound as well as for a positively identified target compound.
- E:** This identifies compounds whose concentrations exceed the upper level of the linear calibration range of the instrument for that specific analysis. If one or more compounds have a response greater than the upper level of the calibration range, the sample or extract should be diluted and re-analyzed.
- Note: For Total xylene, where three isomers are quantified as two peaks, the calibration range of each peak should be considered separately.*
- X:** Defined by the laboratory
- Z:** Surrogates/Spikes results exceeds quality control limits
- ZZ:** Surrogates/Spikes results exceeds quality control limits in multiple samples
- ***:** Surrogate recoveries were diluted out
- M:** Manual integrations were necessary and an "m" qualifying code is present on the quantitation report next to the analyte.
- D:** This flag indicates that the identified compound is reported from the dilution run.



CHAIN OF CUSTODY RECORD

LAB NUMBER:

565777

Mr.

- Jacksonville: 6601 Southpoint Parkway, Jacksonville, FL 32216 • (904) 363-9350 Fax (904) 363-9354
- Tampa: 9610 Princess Palm Avenue, Tampa, FL 33619 • (813) 630-9616 Fax (813) 630-4327
- Gainesville: 2106 NW 67th Place, Suite 7, Gainesville, FL 32606 • (352) 367-1500 Fax (352) 367-0000

Case No: 12736

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Chain-of-Custody for AEL Tampa to AEL Jax

AEL Tampa
5810-D Breckinridge Parkway
Tampa, FL 33610
813-630-9616 Fax 813-630-4327
Contact Person: Michael Cammarata

AEL Jax
6601 Southpoint Parkway
Jacksonville, FL 32216
904-363-9350 Fax 904-363-9354
Contact Person: Sean Hyde

Project #: T043005
CustomerName: Howco, Inc.
Collector: James Jones

☐ Check if Rush

Lab Code	Client Sample ID	Test	Matrix	Collect Date / Time	Receive Date	Due Date	# Bottles	Bottle Type (Pres.)
T043005-01	WWTS	Hg (TCLP)	Soil	3/26/2004 9:30	3/26/04 12:40	4/9/2004		
T043005-01	WWTS	TCLP ICP Metals	Soil	3/26/2004 9:30	3/26/04 12:40	4/9/2004		
T043005-01	WWTS	TCLP Semi-Volatiles	Soil	3/26/2004 9:30	3/26/04 12:40	4/9/2004		
T043005-01	WWTS	TCLP Volatiles	Soil	3/26/2004 9:30	3/26/04 12:40	4/9/2004		
T043005-01	WWTS	TCLP Volatiles	Soil	3/26/2004 9:30	3/26/04 12:40	4/9/2004		
T043005-01	WWTS	TCLP Pesticides	So	3/26/04 9:30	3/26/04 12:40			

Tampa Relinquisher: James Jones

Shipping Relinquisher: Michael Cammarata

Shipping Receiver: R

Jacksonville Receiver: Michael

Date/Time: 3/29/04 1600

Date/Time: 3/29/04 0830



Environmental Laboratories, Inc.

LAB NUMBER: 7-1200-

☐ Tampa: 5810-D Breckenridge Parkway, Tampa, FL 33610 • (813) 630-9616 Fax (813) 630-4327
☐ Gainesville: 2106 NW 87th Place, Suite 7, Gainesville, FL 32608 • (352) 367-1500 Fax (352) 367-0050

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Advanced
Environmental Laboratories, Inc.

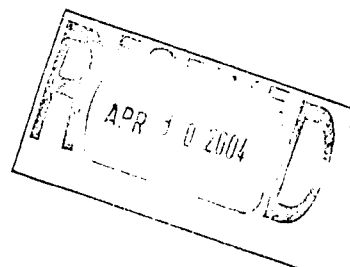
9610 Princess Palm Avenue
Tampa, Florida 33619
(813) 630-9616
FAX (813) 630-4327

Client: Howco, Inc.
Project Name: Annual Compliance
Project Number: 31483

Report No.: T043190
Date Sampled: 4/1/04
Date Received: 4/1/04 12:35
Date Reported: 4/28/04

Attention: Richard Dillen
Phone Number: 727-328-7403

Address: 3701 Central Ave.
St. Petersburg, FL 33713



Project Description

The analytical results for the samples contained in this report were submitted for analysis as outlined by the Chain of Custody.

Project Name: Annual Compliance

Approved By:

Nissa Mulnick, QA Deputy

If you have any questions, the above named should be contacted.

Advanced Environmental Laboratories certifies that the test results in this report meet all requirements of the NELAC standards, unless notated otherwise in the body of the report.

Total Number of Pages = 15

Advanced Environmental Laboratories, Inc.

Analytical Report

Client: Howco, Inc.

Project Name: Annual Compliance

Report No.: T043190-01

Date/Time Received: 4/1/04 12:38 PM

Lab Code: T043190-01

Date/Time Sampled: 4/1/04 9:30

Client Sample ID: 1

Shipping Method: AEL Pick-up

Site: WWTS

Sampled By: James Jones

Matrix: Soil

Sampling Method: G

TCLP Metals

Analytes:	Dilution	Adjusted MDL	Adjusted PQL	Results	Units	Qualifier(s)	Method	Parameter Comment	Lab
Arsenic	1	0.041	0.16	0.041	mg/L	U	SW6010B		J
Barium	1	0.0023	0.0092	0.084	mg/L	V	SW6010B		J
Cadmium	1	0.00057	0.0023	0.00057	mg/L	U	SW6010B		J
Chromium	1	0.0018	0.0072	0.0022	mg/L	i	SW6010B		J
Lead	1	0.0067	0.027	0.0071	mg/L	i, V	SW6010B		J
Selenium	1	0.044	0.18	0.044	mg/L	U	SW6010B		J
Silver	1	0.019	0.076	0.019	mg/L	U	SW6010B		J

TCLP Metals (Hg)

Analytes:	Dilution	Adjusted MDL	Adjusted PQL	Results	Units	Qualifier(s)	Method	Parameter Comment	Lab
Mercury	1	0.00033	0.0013	0.00033	mg/L	U	SW7470A		J

TCLP Pesticides

Analytes:	Dilution	Adjusted MDL	Adjusted PQL	Results	Units	Qualifier(s)	Method	Parameter Comment	Lab
Chlordane	10	2.0	7.8	2.0	ug/L	U	SW8081A		J
Endrin	10	0.14	0.56	0.14	ug/L	U	SW8081A		J
Gamma-BHC (Lindane)	10	0.060	0.24	0.060	ug/L	U	SW8081A		J
Heptachlor	10	0.63	2.5	0.63	ug/L	U	SW8081A		J
Heptachlor Epoxide	10	0.13	0.52	0.13	ug/L	U	SW8081A		J
Methoxychlor	10	0.14	0.56	0.14	ug/L	U	SW8081A		J
Toxaphene	10	0.70	2.8	0.70	ug/L	U	SW8081A		J

TCLP Semi-Volatile Organic Compounds

Analytes:	Dilution	Adjusted MDL	Adjusted PQL	Results	Units	Qualifier(s)	Method	Parameter Comment	Lab
1,4-Dichlorobenzene	10	0.029	0.12	0.029	mg/L	U	SW8270C		J
2,4,5-Trichlorophenol	10	0.035	0.14	0.035	mg/L	U	SW8270C		J
2,4,6-Trichlorophenol	10	0.022	0.088	0.022	mg/L	U	SW8270C		J
2,4-Dinitrotoluene	10	0.0094	0.038	0.0094	mg/L	U	SW8270C		J
Cresols, Total	10	0.085	0.34	0.22	mg/L	i	SW8270C		J
Hexachlorobenzene	10	0.018	0.070	0.018	mg/L	U	SW8270C		J
Hexachlorobutadiene	10	0.021	0.084	0.021	mg/L	U	SW8270C		J
Hexachloroethane	10	0.028	0.11	0.028	mg/L	U	SW8270C		J
Nitrobenzene	10	0.010	0.040	0.010	mg/L	U	SW8270C		J
Pentachlorophenol	10	0.032	0.13	0.032	mg/L	U	SW8270C		J
Pyridine	10	0.018	0.074	0.018	mg/L	U	SW8270C		J

TCLP Volatile Organics

Analytes:	Dilution	Adjusted MDL	Adjusted PQL	Results	Units	Qualifier(s)	Method	Parameter Comment	Lab
1,1-Dichloroethene	10	0.0050	0.020	0.0050	mg/L	U	SW8260B		J
1,2-Dichloroethane	10	0.0036	0.014	0.0036	mg/L	U	SW8260B		J
1,4-Dichlorobenzene	10	0.0030	0.012	0.0030	mg/L	U	SW8260B		J
Benzene	10	0.0030	0.012	0.11	mg/L		SW8260B		J
Carbon Tetrachloride	10	0.0039	0.016	0.0039	mg/L	U	SW8260B		J
Chlorobenzene	10	0.0031	0.012	0.0031	mg/L	U	SW8260B		J

Advanced Environmental Laboratories, Inc.

Analytical Report

Client: Howco, Inc.

Report No.: T043190

Project Name: Annual Compliance

Date/Time Received: 4/1/04 12:35

Chloroform	10	0.0041	0.016	0.0041	mg/L	U	SW8260B	J
Methyl ethyl ketone	10	0.0025	0.010	0.11	mg/L		SW8260B	J
Tetrachloroethene	10	0.0043	0.017	0.030	mg/L		SW8260B	J
Trichloroethene	10	0.0043	0.017	0.0043	mg/L	U	SW8260B	J
Vinyl Chloride	10	0.0049	0.020	0.0049	mg/L	U	SW8260B	J

Surrogates:	Control Limits	% Recovery	Qual.	Method	Prep Method
Decachlorobiphenyl	30 - 120	23		SW8081A	SW1311/SW3510C
Tetrachloro-m-xylene	30 - 120	387	J4	SW8081A	SW1311/SW3510C
1,2-Dichloroethane-d4	80 - 120	96		SW8260B	SW1311/SW5030B
4-Bromofluorobenzene	86 - 115	100		SW8260B	SW1311/SW5030B
Toluene d(8)	88 - 110	100		SW8260B	SW1311/SW5030B
2,4,6-Tribromophenol	15 - 112	78		SW8270C	SW1311/SW3510C
2-Fluorobiphenyl	20 - 119	82		SW8270C	SW1311/SW3510C
2-Fluorophenol	20 - 119	34		SW8270C	SW1311/SW3510C
Nitrobenzene d5	23 - 120	78		SW8270C	SW1311/SW3510C
p-Terphenyl-d14	18 - 137	82		SW8270C	SW1311/SW3510C
Phenol-d6	18 - 121	23		SW8270C	SW1311/SW3510C

i The reported value is between the laboratory method detection limit and the laboratory practical quantitation limit.

J4 The sample matrix interfered with the ability to make an accurate determination.

U The compound was analyzed for but not detected.

V Indicates that the analyte was detected in both the sample and the associated method blank.

J DOH certification #E82574 (AEL-JAX) (FL NELAC certification)

* Comment for Gamma-BHC (Lindane) - Sample reran at 1:10 dilution on 4/13/04 with sequence C041304 due to matrix interference

Advanced Environmental Laboratories, Inc.

Analytical Report

Client: Howco, Inc.

Report No.: T043190

Project Name: Annual Compliance

Date/Time Received: 4/1/04 12:35

Sample Cross Reference Information

Lab Code: T043190-01

Site: WWTS

Client Sample Number: 1

Matrix: Soil

Test Description	Analysis Method	Prep Method	Analytical Batch ID	Analysis Date/Time	Analyst	Prep Batch ID	Prep Date/Time
TCLP Extraction (Non-Volatile)	SW1311	NONE				oe040704ldp	4/7/04 5:00:00 P
TCLP Extraction (Volatile)	SW1311	NONE				oe040704ldp	4/7/04 5:00:00 P
TCLP Herbicides	SW8151A	SW1311/METHOD					
TCLP Metals	SW6010B	SW1311/SW3010A	M041204-3010-2	4/12/04 15:31	KC	M041204-3010-2	4/12/04 8:15:00
TCLP Metals (Hg)	SW7470A	SW1311/METHOD	M040904-HG-5	4/9/04 13:17	TP	M040904-HG-5	4/9/04 4:30:00 A
TCLP Pesticides	SW8081A	SW1311/SW3510C	sv041204c-pp	4/12/04 19:34	MP	sv041204-pp	4/12/04 9:59:00
TCLP Semi-Volatile Organic Compounds	SW8270C	SW1311/SW3510C	SV041804L	4/18/04 13:24	JA	sv041304-bna	4/13/04 8:30:00
TCLP Volatile Organics	SW8260B	SW1311/SW5030B	V041204A	4/12/04 10:27	BB	V041204A	

If the Analytical Batch ID and Prep Batch ID is null, the analysis was not performed by AEL, and the original report from the subcontracted laboratory will be provided containing this information.

Advanced Environmental Laboratories, Inc.

Analytical Report

Client: Howco, Inc.

Project Name: Annual Compliance

Report No.: T043190

Date/Time Received: 4/1/04 12:35

Quality Assurance Report

Method Blanks

TCLP Metals (Hg)							
QCBatchID	Analyte	QC Sample Type	Method	MDL	Result	Units	Qualifier
M040904-HG-5	Mercury	Method Blank	SW7470A	0.00033	0.00033	mg/L	U

TCLP Metals							
QCBatchID	Analyte	QC Sample Type	Method	MDL	Result	Units	Qualifier
M041204-3010-2	Arsenic	Method Blank	SW6010B	0.041	0.041	mg/L	U
M041204-3010-2	Barium	Method Blank	SW6010B	0.0023	0.0094	mg/L	U
M041204-3010-2	Cadmium	Method Blank	SW6010B	0.00057	0.00057	mg/L	U
M041204-3010-2	Chromium	Method Blank	SW6010B	0.0018	0.0018	mg/L	U
M041204-3010-2	Lead	Method Blank	SW6010B	0.0067	0.0088	mg/L	U
M041204-3010-2	Selenium	Method Blank	SW6010B	0.044	0.044	mg/L	U
M041204-3010-2	Silver	Method Blank	SW6010B	0.019	0.019	mg/L	U

TCLP Pesticides							
QCBatchID	Analyte	QC Sample Type	Method	MDL	Result	Units	Qualifier
sv041204c-pp	Chlordane	Method Blank	SW8081A	0.20	0.20	ug/L	U
sv041204c-pp	Endrin	Method Blank	SW8081A	0.014	0.014	ug/L	U
sv041204c-pp	Gamma-BHC (Lindane)	Method Blank	SW8081A	0.0060	0.0060	ug/L	U
sv041204c-pp	Heptachlor	Method Blank	SW8081A	0.063	0.063	ug/L	U
sv041204c-pp	Heptachlor Epoxide	Method Blank	SW8081A	0.013	0.013	ug/L	U
sv041204c-pp	Methoxychlor	Method Blank	SW8081A	0.014	0.014	ug/L	U
sv041204c-pp	Toxaphene	Method Blank	SW8081A	0.070	0.070	ug/L	U
Surrogate(s)	Result	Units	% Recovery	Qualifier	Acceptance Limits		
Tetrachloro-m-xylene	0.79	ug/L	79		30 - 120		
Decachlorobiphenyl	0.26	ug/L	53		30 - 120		

TCLP Semi-Volatile Organic Compounds							
QCBatchID	Analyte	QC Sample Type	Method	MDL	Result	Units	Qualifier
SV041804L	1,4-Dichlorobenzene	Method Blank	SW8270C	0.0029	0.0029	mg/L	U
SV041804L	2,4,5-Trichlorophenol	Method Blank	SW8270C	0.0035	0.0035	mg/L	U
SV041804L	2,4,6-Trichlorophenol	Method Blank	SW8270C	0.0022	0.0022	mg/L	U
SV041804L	2,4-Dinitrotoluene	Method Blank	SW8270C	0.00094	0.00094	mg/L	U
SV041804L	Cresols, Total	Method Blank	SW8270C	0.0085	0.0085	mg/L	U
SV041804L	Hexachlorobenzene	Method Blank	SW8270C	0.0018	0.0018	mg/L	U
SV041804L	Hexachlorobutadiene	Method Blank	SW8270C	0.0021	0.0021	mg/L	U
SV041804L	Hexachloroethane	Method Blank	SW8270C	0.0028	0.0028	mg/L	U
SV041804L	Nitrobenzene	Method Blank	SW8270C	0.0010	0.0010	mg/L	U
SV041804L	Pentachlorophenol	Method Blank	SW8270C	0.0032	0.0032	mg/L	U
SV041804L	Pyridine	Method Blank	SW8270C	0.0018	0.0018	mg/L	U
Surrogate(s)	Result	Units	% Recovery	Qualifier	Acceptance Limits		
2-Fluorophenol	11	ug/L	21		20 - 119		
Phenol-d6	9.6	ug/L	19		18 - 121		
Nitrobenzene d5	40	ug/L	79		23 - 120		
2-Fluorobiphenyl	41	ug/L	83		20 - 119		
2,4,6-Tribromophenol	22	ug/L	43		15 - 112		
p-Terphenyl-d14	39	ug/L	78		18 - 137		

TCLP Volatile Organics							
QCBatchID	Analyte	QC Sample Type	Method	MDL	Result	Units	Qualifier
V041204A	1,1-Dichloroethene	Method Blank	SW8260B	0.00050	0.00050	mg/L	U
V041204A	1,2-Dichloroethane	Method Blank	SW8260B	0.00036	0.00036	mg/L	U
V041204A	1,4-Dichlorobenzene	Method Blank	SW8260B	0.00030	0.00030	mg/L	U
V041204A	Benzene	Method Blank	SW8260B	0.00030	0.00030	mg/L	U
V041204A	Carbon Tetrachloride	Method Blank	SW8260B	0.00039	0.00039	mg/L	U

Advanced Environmental Laboratories, Inc.

Analytical Report

Client: Howco, Inc.

Report No.: T043190

Project Name: Annual Compliance

Date/Time Received: 4/1/04 12:35

V041204A	Chlorobenzene	Method Blank	SW8260B	0.00031	0.00031	mg/L	U
V041204A	Chloroform	Method Blank	SW8260B	0.00041	0.00041	mg/L	U
V041204A	Methyl ethyl ketone	Method Blank	SW8260B	0.00025	0.00025	mg/L	U
V041204A	Tetrachloroethene	Method Blank	SW8260B	0.00043	0.00043	mg/L	U
V041204A	Trichloroethene	Method Blank	SW8260B	0.00043	0.00043	mg/L	U
V041204A	Vinyl Chloride	Method Blank	SW8260B	0.00049	0.00049	mg/L	U
Surrogate(s)	Result	Units	% Recovery	Qualifier	Acceptance Limits		
1,2-Dichloroethane-d4	49	ug/L	98		80 - 120		
Toluene d(8)	51	ug/L	102		88 - 110		
4-Bromofluorobenzene	51	ug/L	102		86 - 115		

Quality Assurance Qualifiers:

- i The reported value is between the laboratory method detection limit and the laboratory practical quantitation limit.
- U The compound was analyzed for but not detected.

Definitions:

Water matrix refers to all aqueous matrices except drinking water, including but not limited to, wastewater, ground water, surface water, aqueous wastes and leach

Soil matrix refers to all non-aqueous matrices, including soils, solids, sludges, semi-solids, and non-aqueous waste samples

All results in mg/kg or % are reported in dry weight basis, unless notated otherwise. All results in mg/L are reported in wet weight basis.

MDL Method Detection Limit, without correction for dilution or moisture content

Adjusted Reporting Limit is the MDL accounting for all dilutions and moisture content calculations.

PQL is defined to be 4 times the MDL, for all results qualified with a 'I' qualifier.

Sampling Method; G=Grab, P=Pump, C=Composite

The estimated measurements of uncertainty can be provided upon request

This is the last page of the analytical report.



22-APR-04

Advanced Environmental Laboratories, Inc.
6601 Southpoint Pkwy.
Jacksonville, FL 32216
Client Contact: Walter Kronz

Reference: Accura Analytical Laboratory, Inc. (AAL) Work Order No: 5946
Project Name :JO43190
Project Number: JO43190

Dear Walter Kronz :

We are reporting to you the results of the analyses performed on the samples received under the project name referenced above and identified with the Chain of Custody(s) Numbered NA . All results being reported under this Chain of Custody apply to the samples analyzed and properly identified with an AAL Sample ID number.

All the results for the quality control samples were reviewed. Also, all parameters for data reduction and validation were reviewed. In view of this, we are able to release the analytical data for this report within acceptance criteria for accuracy, precision, completeness or properly flagged.

The validity and integrity of this report will remain intact as long as it is accompanied by this letter and reproduced in full, unless written approval is granted by AAL. This report will be filed for at least 7 years in our archives after which time it will be destroyed without further notice, unless otherwise arranged with you. The samples received, and described as recorded in COC No. NA will be filed for 90 days, and after that time they will be properly disposed without further notice, unless otherwise arranged with you. We reserve the right to return to you any unused samples, extracts or solutions related to them if we consider so necessary (e.g., samples identified as hazardous waste, sample sizes exceeding analytical standard practices, controlled substances under regulated protocols, etc).

We thank you for selecting Accura Analytical Laboratory Inc. to serve your analytical needs. If you have any questions concerning this report, please feel free to contact me at any time.

Sincerely,

David Fuller
Project Manager

6017 Financial Drive Norcross, GA 30071
Phone: 770-449-8800 Fax: 770-449-5477



ACCURA ANALYTICAL LABORATORY, INC. (AAL)
6017 Financial Drive, Norcross, Georgia, 30071, Phone (770) 449-8800
FL Certification #E87429 LA Certification #04079 NC Certification #483
SC Certification #98015 USACE-MRD Approved
Case Narrative

AAL Work Order # 5946

Client Project: JO43190 / JO43190

Accura Analytical Laboratory Inc. certifies that the results meet all requirements of the NELAC Standards.

The data package includes a 1 page case narrative, 1 report page, 2 QC surrogate recovery pages, and 1 QC Blank Spike / Blank Spike Duplicate recovery page.

Project Manager Notations:

No problems were encountered with this work order.

These Case Narrative Notations have been generated, reviewed, and edited by:

David C. Fuller
VP - Client Services

April 22, 2004

Date



Certificate of Analytical Results 5946

Advanced Environmental Laboratories, Inc., Jacksonville, FL
JO43190

Sample Id: TO43190	Matrix: SOIL	% Moisture:
Lab Sample Id: 5946-001	Date Collected: Apr-01-04 09:30	Date Received: Apr-09-04 09:25
Sample Depth:		

Analytical Method: TCLP Herbicides by SW1311/8151A					Prep Method: EXT_SW8151		
Date Analyzed: Apr-21-04 21:46		Analyst: MJL01		Date Prep: Apr-12-04 08:30		Tech: NRO01	
Seq Number: 21641							
Parameter	Cas Number	Result	Rep Limit	MDL	Units	Flag	Dil
2,4,5-TP (Silvex)	93-72-1	BRL	0.0050	0.0000031	mg/L		1
2,4-D	94-75-7	BRL	0.0050	0.0000048	mg/L		1

Sample Id: TO43190 - MB	Matrix: LIQUID	% Moisture:
Lab Sample Id: 5946-002	Date Collected: Apr-07-04 17:00	Date Received: Apr-09-04 09:25
Sample Depth:		

Analytical Method: TCLP Herbicides by SW1311/8151A					Prep Method: EXT_SW8151		
Date Analyzed: Apr-21-04 22:10		Analyst: MJL01		Date Prep: Apr-12-04 08:30		Tech: NRO01	
Seq Number: 21641							
Parameter	Cas Number	Result	Rep Limit	MDL	Units	Flag	Dil
2,4,5-TP (Silvex)	93-72-1	BRL	0.0050	0.0000031	mg/L		1
2,4-D	94-75-7	BRL	0.0050	0.0000048	mg/L		1

Sample Id: 18639 BLK	Matrix: SOIL	% Moisture:
Lab Sample Id: 18639 BLK	Date Collected:	Date Received:
Sample Depth:		

Analytical Method: TCLP Herbicides by SW1311/8151A					Prep Method: EXT_SW8151		
Date Analyzed: Apr-21-04 19:43		Analyst: MJL01		Date Prep: Apr-12-04 08:30		Tech: NRO01	
Seq Number: 21641							
Parameter	Cas Number	Result	Rep Limit	MDL	Units	Flag	Dil
2,4,5-TP (Silvex)	93-72-1	BRL	0.0010	0.00000060	mg/L		1
2,4-D	94-75-7	BRL	0.0010	0.0000010	mg/L		1

p.9



Form 2 - Surrogate Recoveries

Project Name: JO43190

Report Date: 04/22/04 17:14

Project ID: JO43190

Work Order #: 5946

Lab Batch #: 21641

Sample: 18639 BLK / BLK

Batch: 1 Matrix: S

Units: mg/L

SURROGATE RECOVERY STUDY					
TCLP Herbicides by SW1311/8151A	Amount Found [A]	True Amount [B]	Recovery %R [D]	Control Limits %R	Flags
Analytes					
2,4-Dichlorophenylacetic Acid	0.000002800	0.005000	55	33-109	

Lab Batch #: 21641

Sample: 18639 BLK / BLK

Batch: 1 Matrix: S

Units: mg/L

SURROGATE RECOVERY STUDY					
TCLP Herbicides by SW1311/8151A	Amount Found [A]	True Amount [B]	Recovery %R [D]	Control Limits %R	Flags
Analytes					
2,4-Dichlorophenylacetic Acid	0.000002900	0.005000	58	33-109	

Lab Batch #: 21641

Sample: 5946-001 / SMP

Batch: 1 Matrix: S

Units: mg/L

SURROGATE RECOVERY STUDY					
TCLP Herbicides by SW1311/8151A	Amount Found [A]	True Amount [B]	Recovery %R [D]	Control Limits %R	Flags
Analytes					
2,4-Dichlorophenylacetic Acid	0.01187	0.02500	47	6-127	

Lab Batch #: 21641

Sample: 5946-001 / SMP

Batch: 1 Matrix: S

Units: mg/L

SURROGATE RECOVERY STUDY					
TCLP Herbicides by SW1311/8151A	Amount Found [A]	True Amount [B]	Recovery %R [D]	Control Limits %R	Flags
Analytes					
2,4-Dichlorophenylacetic Acid	0.01435	0.02500	57	6-127	

Lab Batch #: 21641

Sample: 5946-002 / SMP

Batch: 1 Matrix: S

Units: mg/L

SURROGATE RECOVERY STUDY					
TCLP Herbicides by SW1311/8151A	Amount Found [A]	True Amount [B]	Recovery %R [D]	Control Limits %R	Flags
Analytes					
2,4-Dichlorophenylacetic Acid	0.01018	0.02500	41	6-127	

- * Surrogate outside of Laboratory QC limits
 - ** Surrogates outside limits; data and surrogates confirmed by reanalysis
 - *** Poor recoveries due to dilution
- Surrogate Recovery [D] = $100 \times A / B$
All results are based on MDL and validated for QC purposes.
Z = Surrogate Recovery exceeded the Laboratory QC limits



Form 2 - Surrogate Recoveries

Project Name: JO43190

Report Date: 04/22/04 17:14

Project ID: JO43190

Work Order #: 5946

Lab Batch #: 21641

Sample: 5946-002 / SMP

Batch: 1 Matrix: S

Units: mg/L

SURROGATE RECOVERY STUDY					
TCLP Herbicides by SW1311/8151A	Amount Found [A]	True Amount [B]	Recovery %R [D]	Control Limits %R	Flags
Analytes					
2,4-Dichlorophenylacetic Acid	0.01449	0.02500	58	6-127	

- Surrogate outside of Laboratory QC limits
 - ** Surrogates outside limits; data and surrogates confirmed by reanalysis
 - *** Poor recoveries due to dilution
- Surrogate Recovery [D] = $100 \cdot A / B$
All results are based on MDL and validated for QC purposes.
Z = Surrogate Recovery exceeded the Laboratory QC limits



BS / BSD Recoveries

Project Name: JO43190

Work Order #: 5946

Report Date 04/22/04 12:43

Lab Batch ID: 21641

Sample: 18639 BLK

Batch #: 1

Project ID: JO43190
Matrix: SOIL

Units: mg/L

Units: mg/L		BLANK /BLANK SPIKE / BLANK SPIKE DUPLICATE RECOVERY STUDY										
TCLP Herbicides by SW1311/8151A		Blank Sample Result [A]	Spike Added [B]	Blank Spike Result [C]	Blank Spike %R [D]	Spike Added [E]	Blank Spike Duplicate Result [F]	Blk. Spk Dup. %R [G]	RPD %	Control Limits %R	Control Limits %RPD	Flag
Analytes												
2,4,5-TP (Silvex)		<0.0010	0.0025	0.0018	72	0.0025	0.0017	68	6	48-109	20	
2,4-D		<0.0010	0.0025	0.0019	76	0.0025	0.0019	76	0	10-129	20	

Relative Percent Difference RPD = $200 \times (D-G)/(D+G)$

Blank Spike Recovery [D] = $100 \times (C)/[B]$

Blank Spike Duplicate Recovery [G] = $100 \times (F)/[E]$

All results are based on MDL and Validated for QC Purposes

F = RPD exceeded the laboratory control limits

2/2

Chain-of-Custody for AEL Tampa to AEL Jax

AEL Tampa
5810-D Breckinridge Parkway
Tampa, FL 33610
813-630-9616 Fax 813-630-4327
Contact Person: Michael Cammarata

AEL Jax
6601 Southpoint Parkway
Jacksonville, FL 32216
904-363-9350 Fax 904-363-9354
Contact Person: Sean Hyde

Project #: T043190

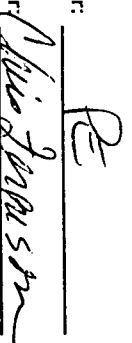
CustomerName: Howco, Inc.

Collector: James Jones

☐ Check if Rush

Lab Code	Client Sample ID	Test	Matrix	Collect Date / Time	Receive Date	Due Date	# Bottles	Bottle Type (Pres.)
T043190-01	1	Hg (TCLP)	Soil	4/1/2004 9:30	4/1/04 12:35	4/15/2004	—	4oz. Glass Jar
T043190-01	1	TCLP ICP Metals	Soil	4/1/2004 9:30	4/1/04 12:35	4/15/2004	—	8oz. Glass Jar
T043190-01	1	TCLP Semi-Volatiles	Soil	4/1/2004 9:30	4/1/04 12:35	4/15/2004	—	8oz. Glass Jar
T043190-01	1	TCLP Volatiles	Soil	4/1/2004 9:30	4/1/04 12:35	4/15/2004	—	8oz. Glass Jar
T043190-01	1	TCLP Volatiles	Soil	4/1/2004 9:30	4/1/04 12:35	4/15/2004	—	8oz. Glass Jar

Tampa Relinquisher: 

Shipping Receiver: 

Date/Time: 4/1/04 1600
Date/Time: 4-2-04 0800

Advanced Environmental Laboratories, Inc.

CHAIN OF CUSTODY RECORD

☐ Jacksonville: 6601 Southport Parkway, Jacksonville, FL 32216 • (904) 363-9630 Fax (904) 363-9354

☐ Tampa: 9610 Princess Palm Avenue, Tampa, FL 33619 • (813) 350-9616 Fax (813) 650-4327

☐ Gainesville: 2106 NW 67th Place, Suite 7, Gainesville, FL 32606 • (352) 367-1500 Fax (352) 367-0050

CHAIN OF CUSTODY RECORD

LAB NUMBER: 600 # 5946

Page 1 of 1[illegible]

☐ Jacksonville: 6601 Southpoint Parkway, Jacksonville, FL 32216 • (904) 363-9350 Fax (904) 363-9354
☒ Tampa: 5810-D Breckenridge Parkway, Tampa, FL 33610 • (813) 630-9616 Fax (813) 630-4327
☐ Gainesville: 2106 NW 67th Place, Suite 7, Gainesville, FL 32606 • (352) 367-1500 Fax (352) 367-0056

Page 15 of 15[illegible]

*file
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compl. file*

Florida Department of
Environmental Protection

Facsimile Cover Sheet

To: Mike Wolfe

HOWCO Environmental Services

Phone: (727)327-8467 x246

Fax: (727)321-6213

From: Jim Dregne

Company: DEP Hazardous Waste Section
3804 Coconut Palm Drive
Tampa, Florida 33619

Phone: (813) 744-6100, extension 410
or S.C. 512-1042, extension 410

Fax: (813) 744-6125

Date: March 8, 2004

Pages including this 2
cover page:

FYI

I have attached a copy of 40 CFR 279.44 that requires used oil transporters to keep records of their screening of used oil for total halogens.

40 CFR 279.44(a) says "the used oil transporter must determine whether the total halogen content of used oil being transported or stored at a transfer facility is above or below 1,000 ppm."

40 CFR 279.44(d) says "Records of analyses conducted or information used to comply with paragraphs (a), (b), (c), of this section must be maintained by the transporter for at least 3 years."

FAC 62-710 adopts 40 CFR Part 279

If you have any questions, give me a call, Jim.

*File: 3-F
20/04*

- (3) An air, rail, highway, or water transporter who has discharged used oil must:
- (i) Give notice, if required by 49 *CFR* 171.15 to the National Response Center (800-424-8802 or 202-426-2675); and
 - (ii) Report in writing as required by 49 *CFR* 171.16 to the Director, Office of Hazardous Materials Regulations, Materials Transportation Bureau, Department of Transportation, Washington, DC 20590.
- (4) A water transporter who has discharged used oil must give notice as required by 33 *CFR* 153.203.
- (5) A transporter must clean up any used oil discharged that occurs during transportation or take such action as may be required or approved by federal, state, or local officials so that the used oil discharge no longer presents a hazard to human health or the environment.

[57 FR 41612, Sept. 10, 1992, as amended at 58 FR 26425, May 3, 1993]

§ 279.44 Rebuttable presumption for used oil.

♦ RDB—6644

- (a) To ensure that used oil is not a hazardous waste under the rebuttable presumption of § 279.10(b)(1)(ii), the used oil transporter must determine whether the total halogen content of used oil being transported or stored at a transfer facility is above or below 1,000 ppm.
- (b) The transporter must make this determination by:
- (1) Testing the used oil; or
 - (2) Applying knowledge of the halogen content of the used oil in light of the materials or processes used.
- (c) If the used oil contains greater than or equal to 1,000 ppm total halogens, it is presumed to be a hazardous waste because it has been mixed with halogenated hazardous waste listed in subpart D of part 261 of this chapter. The owner or operator may rebut the presumption by demonstrating that the used oil does not contain hazardous waste (for example, by using an analytical method from SW-846, Edition III, to show that the used oil does not contain significant concentrations of halogenated hazardous constituents listed in Appendix VIII of part 261 of this chapter). EPA Publication SW-846, Third Edition, is available from the Government Printing Office, Superintendent of Documents, PO Box 371954, Pittsburgh, PA 15250-7954. (202) 783-3238 (document number 955-001-00000-1).

♦ RDB—6642

- (1) The rebuttable presumption does not apply to metalworking oils/fluids containing chlorinated paraffins, if they are processed, through a tolling arrangement as described in § 279.24(c), to reclaim metalworking oils/fluids. The presumption does apply to metalworking oils/fluids if such oils/fluids are recycled in any other manner, or disposed.
 - (2) The rebuttable presumption does not apply to used oils contaminated with chlorofluorocarbons (CFCs) removed from refrigeration units if the CFC are destined for reclamation. The rebuttable presumption does apply to used oils contaminated with CFCs that have been mixed with used oil from sources other than refrigeration units.
- (d) *Record retention.* Records of analyses conducted or information used to comply with paragraphs (a), (b), and (c) of this section must be maintained by the transporter for at least 3 years.

[57 FR 41612, Sept. 10, 1992, as amended at 59 FR 10560, Mar. 4, 1994]

§ 279.45 Used oil storage at transfer facilities.

Used oil transporters are subject to all applicable Spill Prevention, Control and Countermeasures (40 *CFR* part 112) in addition to the requirements of this subpart. Used oil transporters are also subject to the Underground Storage Tank (40 *CFR* part 280) standards for used oil stored in underground tanks whether or not the used oil exhibits any characteristics of hazardous waste, in addition to the requirements of this subpart.

- (a) *Applicability.* This section applies to used oil transfer facilities. Used oil transfer facilities are transportation related facilities including loading docks, parking areas, storage areas, and other areas where shipments of used oil are held for more than 24 hours during the normal course of transportation and not longer than 35 days. Transfer facilities that store used oil for more than 35 days are subject to regulation under subpart F of this chapter.
- (b) *Storage units.* Owners or operators of used oil transfer facilities may not store used oil in units other than tanks, containers, or units subject to regulation under parts 264 or 265 of this chapter.
- (c) *Condition of units.* Containers and aboveground tanks used to store used oil at transfer facilities must be:
- (1) In good condition (no severe rusting, apparent structural defects or deterioration); and
 - (2) Not leaking (no visible leaks).

HOWCO Environmental Services

May 5, 2004

Solid Waste Section Manager
c/o Mrs. Susan J. Pelz
Florida Dept. of Environmental Protection
Southwest District
3804 Coconut Palm Drive
Tampa, FL 33619



Re: Permit #92465-HO06-001
Results of "WWTS" testing

Dear Mrs. Pelz,

Please find enclosed copies of the additional Full-TCLP analyses on two consecutive batches of Waste Water Treatment Sludge (WWTS), per Specific Condition IV.4.c(5).
The results of both batches show that the concentrations of all parameters are below toxic contaminant Regulatory Levels.

If you have any questions, please do not hesitate to contact me at 727-328-7403, ext. 347.

Sincerely,

A handwritten signature in black ink, appearing to read "Richard Dillen".

Richard Dillen
Quality Assurance Officer

cc: Mr. Stanley C. Tam, FDEP-Tampa (w/Attachment)
Mr. Bill K. Parker, DEP-Tallahassee (w/Attachment)
File (w/Attachment)

File: 3-F
19/04



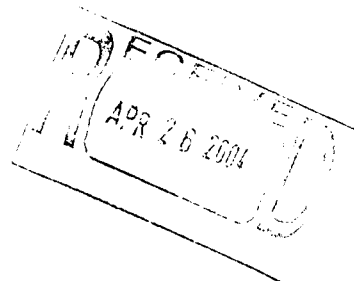
**Advanced
Environmental Laboratories, Inc.**

9610 Princess Palm Avenue
Tampa, Florida 33619
(813) 630-9616
FAX (813) 630-4327

Client: Howco, Inc.
Project Name: Annual Compliance
Project Number: 31483

Report No.: T043005
Date Sampled: 3/26/04
Date Received: 3/26/04 12:40
Date Reported: 4/21/04

Attention: Richard Dillen
Phone Number: 727-328-7403
Address: 3701 Central Ave.
St. Petersburg, FL 33713



Project Description

The analytical results for the samples contained in this report were submitted for analysis as outlined by the Chain of Custody.

Project Name: Annual Compliance

Approved By:

Nissa Mulnick, QA Deputy

If you have any questions, the above named should be contacted.

Advanced Environmental Laboratories certifies that the test results in this report meet all requirements of the NELAC standards, unless notated otherwise in the body of the report.

Total Number of Pages = 16

Advanced Environmental Laboratories, Inc.

Analytical Report

Client: Howco, Inc.

Report No.: T043005

Project Name: Annual Compliance

Date/Time Received: 3/26/04 12:40

Lab Code: T043005-01

Date/Time Sampled: 3/26/04 9:30

Client Sample ID: WWTS

Sample Type:

Site: Howco

Sampled By: James Jones

Matrix: Soil

Sampling Method: G

Shipping Method: AEL Pick-up

TCLP Metals

Analytes:	Dilution	Adjusted MDL	Adjusted PQL	Results	Units	Qualifier(s)	Method	Parameter Comment	Lab
* Arsenic	1	0.041	0.16	0.041	mg/L	U	SW6010B		J
Barium	1	0.0023	0.0092	0.068	mg/L		SW6010B		J
Cadmium	1	0.00057	0.0023	0.00057	mg/L	U	SW6010B		J
Chromium	1	0.0018	0.0072	0.0020	mg/L	I	SW6010B		J
Lead	1	0.0067	0.027	0.0067	mg/L	U	SW6010B		J
Selenium	1	0.044	0.18	0.044	mg/L	U	SW6010B		J
* Silver	1	0.019	0.076	0.019	mg/L	U	SW6010B		J

TCLP Metals (Hg)

Analytes:	Dilution	Adjusted MDL	Adjusted PQL	Results	Units	Qualifier(s)	Method	Parameter Comment	Lab
Mercury	1	0.00033	0.0013	0.00033	mg/L	U	SW7470A		J

TCLP Pesticides

Analytes:	Dilution	Adjusted MDL	Adjusted PQL	Results	Units	Qualifier(s)	Method	Parameter Comment	Lab
Chlordane	10	2.0	7.8	2.0	ug/L	U	SW8081A		J
Endrin	10	0.14	0.56	0.14	ug/L	U	SW8081A		J
Gamma-BHC (Lindane)	10	0.060	0.24	0.060	ug/L	U	SW8081A		J
Heptachlor	10	0.63	2.5	0.63	ug/L	U	SW8081A		J
Heptachlor Epoxide	10	0.13	0.52	0.13	ug/L	U	SW8081A		J
Methoxychlor	10	0.14	0.56	0.14	ug/L	U	SW8081A		J
Toxaphene	10	0.70	2.8	0.70	ug/L	U	SW8081A		J

TCLP Semi-Volatile Organic Compounds

Analytes:	Dilution	Adjusted MDL	Adjusted PQL	Results	Units	Qualifier(s)	Method	Parameter Comment	Lab
1,4-Dichlorobenzene	10	0.029	0.12	0.029	mg/L	U	SW8270C		J
2,4,5-Trichlorophenol	10	0.035	0.14	0.035	mg/L	U	SW8270C		J
2,4,6-Trichlorophenol	10	0.022	0.088	0.022	mg/L	U	SW8270C		J
2,4-Dinitrotoluene	10	0.0094	0.038	0.0094	mg/L	U	SW8270C		J
Cresols, Total	10	0.085	0.34	0.085	mg/L	U	SW8270C		J
Hexachlorobenzene	10	0.018	0.070	0.018	mg/L	U	SW8270C		J
Hexachlorobutadiene	10	0.021	0.084	0.021	mg/L	U	SW8270C		J
Hexachloroethane	10	0.028	0.11	0.028	mg/L	U	SW8270C		J
Nitrobenzene	10	0.010	0.040	0.010	mg/L	U	SW8270C		J
Pentachlorophenol	10	0.032	0.13	0.032	mg/L	U	SW8270C		J
Pyridine	10	0.018	0.074	0.018	mg/L	U	SW8270C		J

TCLP Volatile Organics

Analytes:	Dilution	Adjusted MDL	Adjusted PQL	Results	Units	Qualifier(s)	Method	Parameter Comment	Lab
1,1-Dichloroethene	10	0.0050	0.020	0.0050	mg/L	U	SW8260B		J
1,2-Dichloroethane	10	0.0036	0.014	0.0036	mg/L	U	SW8260B		J
1,4-Dichlorobenzene	10	0.0030	0.012	0.0030	mg/L	U	SW8260B		J
Benzene	10	0.0030	0.012	0.017	mg/L		SW8260B		J
Carbon Tetrachloride	10	0.0039	0.016	0.0039	mg/L	U	SW8260B		J

Advanced Environmental Laboratories, Inc.

Analytical Report

Client: Howco, Inc.

Project Name: Annual Compliance

Report No.: T043005

Date/Time Received: 3/26/04 12:40

Chlorobenzene	10	0.0031	0.012	0.0031	mg/L	U	SW8260B	J
Chloroform	10	0.0041	0.016	0.0041	mg/L	U	SW8260B	J
Methyl ethyl ketone	10	0.0025	0.010	0.0025	mg/L	U	SW8260B	J
Tetrachloroethene	10	0.0043	0.017	0.014	mg/L	i	SW8260B	AIC
Trichloroethene	10	0.0043	0.017	0.0043	mg/L	U	SW8260B	J
Vinyl Chloride	10	0.0049	0.020	0.0049	mg/L	U	SW8260B	J

Surrogates:	Control Limits	% Recovery	Qual.	Method	Prep Method
Decachlorobiphenyl	30 - 120	53		SW8081A	SW1311/SW3510C
Tetrachloro-m-xylene	30 - 120	105		SW8081A	SW1311/SW3510C
1,2-Dichloroethane-d4	80 - 120	88		SW8260B	SW1311/SW5030B
4-Bromofluorobenzene	86 - 115	98		SW8260B	SW1311/SW5030B
Toluene d(8)	88 - 110	98		SW8260B	SW1311/SW5030B
2,4,6-Tribromophenol	15 - 112	86		SW8270C	SW1311/SW3510C
2-Fluorobiphenyl	20 - 119	84		SW8270C	SW1311/SW3510C
2-Fluorophenol	20 - 119	34		SW8270C	SW1311/SW3510C
Nitrobenzene d5	23 - 120	68		SW8270C	SW1311/SW3510C
p-Terphenyl-d14	18 - 137	82		SW8270C	SW1311/SW3510C
Phenol-d6	18 - 121	22		SW8270C	SW1311/SW3510C

AIC Alternate initial calibration criteria used (mean RSD <15%)

i The reported value is between the laboratory method detection limit and the laboratory practical quantitation limit.

U The compound was analyzed for but not detected.

J DOH certification #E82574 (AEL-JAX) (FL NELAC certification)

* Comment for Arsenic - All results for T043005-01 by SW6010B analyzed 04-06-04 due to reanalysis.

* Comment for Silver - Analyzed 04-08-04 due to reanalysis.

Advanced Environmental Laboratories, Inc.

Analytical Report

Client: Howco, Inc.

Report No.: T043005

Project Name: Annual Compliance

Date/Time Received: 3/26/04 12:40

Sample Cross Reference Information

Lab Code: T043005-01

Site: Howco

Client Sample Number: WWTS

Matrix: Soil

Test Description	Analysis Method	Prep Method	Analytical Batch ID	Analysis Date/Time	Analyst	Prep Batch ID	Prep Date/Time
TCLP Extraction (Non-Volatile)	SW1311	NONE				oe033004tdp	3/30/04 5:00:00
TCLP Extraction (Volatile)	SW1311	NONE				oe033004zhe	3/30/04 5:00:00
TCLP Herbicides	SW8151A	SW1311/METHOD					
TCLP Metals	SW6010B	SW1311/SW3010A	M033104-3010-3	4/2/04 11:48	KC	M033104-3010-3	3/31/04 1:28:00
TCLP Metals (Hg)	SW7470A	SW1311/METHOD	M040604-HG-3	4/6/04 13:03	TP	M040604-HG-3	4/6/04 4:30:00 A
TCLP Pesticides	SW8081A	SW1311/SW3510C	sv040904c-pp	4/9/04 14:38	MP	sv040504-pp	4/5/04 10:30:00
TCLP Semi-Volatile Organic Compounds	SW8270C	SW1311/SW3510C	SV041204L	4/12/04 12:51	JA	sv040604-bna	4/6/04 8:30:00 A
TCLP Volatile Organics	SW8260B	SW1311/SW5030B	V040204A	4/2/04 14:58	BB	V040204A	

If the Analytical Batch ID and Prep Batch ID is null, the analysis was not performed by AEL, and the original report from the subcontracted laboratory will be provided containing this information.

Definitions:

Water matrix refers to all aqueous matrices except drinking water, including but not limited to, wastewater, ground water, surface water, aqueous wastes

Soil matrix refers to all non-aqueous matrices, including soils, solids, sludges, semi-solids, and non-aqueous waste samples

All results in mg/kg or % are reported in dry weight basis, unless notated otherwise. All results in mg/L are reported in wet weight basis.

MDL Method Detection Limit, without correction for dilution or moisture content

Adjusted Reporting Limit is the MDL accounting for all dilutions and moisture content calculations.

PQL is defined to be 4 times the MDL, for all results qualified with an 'I' qualifier.

Sampling Methods; P=Pump, C=Composite, G=Grab

Advanced Environmental Laboratories, Inc.

Analytical Report

Client: Howco, Inc.

Report No.: T043005

Project Name: Annual Compliance

Date/Time Received: 3/26/04 12:40

Quality Assurance Report

Method Blanks

TCLP Metals							
QCBatchID	Analyte	QC Sample Type	Method	MDL	Result	Units	Qualifier
M033104-3010-3	Arsenic	Method Blank	SW6010B	0.041	0.042	mg/L	I
M033104-3010-3	Barium	Method Blank	SW6010B	0.0023	0.0060	mg/L	I
M033104-3010-3	Cadmium	Method Blank	SW6010B	0.00057	0.00057	mg/L	U
M033104-3010-3	Chromium	Method Blank	SW6010B	0.0018	0.0045	mg/L	I
M033104-3010-3	Lead	Method Blank	SW6010B	0.0067	0.0067	mg/L	U
M033104-3010-3	Selenium	Method Blank	SW6010B	0.044	0.044	mg/L	U
M033104-3010-3	Silver	Method Blank	SW6010B	0.019	0.019	mg/L	U

TCLP Metals (Hg)							
QCBatchID	Analyte	QC Sample Type	Method	MDL	Result	Units	Qualifier
M040604-HG-3	Mercury	Method Blank	SW7470A	0.00033	0.00033	mg/L	U

TCLP Pesticides							
QCBatchID	Analyte	QC Sample Type	Method	MDL	Result	Units	Qualifier
sv040904c-pp	Chlordane	Method Blank	SW8081A	0.20	0.20	ug/L	U
sv040904c-pp	Endrin	Method Blank	SW8081A	0.014	0.014	ug/L	U
sv040904c-pp	Gamma-BHC (Lindane)	Method Blank	SW8081A	0.0060	0.0060	ug/L	U
sv040904c-pp	Heptachlor	Method Blank	SW8081A	0.063	0.063	ug/L	U
sv040904c-pp	Heptachlor Epoxide	Method Blank	SW8081A	0.013	0.013	ug/L	U
sv040904c-pp	Methoxychlor	Method Blank	SW8081A	0.014	0.014	ug/L	U
sv040904c-pp	Toxaphene	Method Blank	SW8081A	0.070	0.070	ug/L	U

Surrogate(s)	Result	Units	% Recovery	Qualifier	Acceptance Limits
Tetrachloro-m-xylene	0.85	ug/L	85		30 - 120
Decachlorobiphenyl	0.18	ug/L	35		30 - 120

TCLP Semi-Volatile Organic Compounds							
QCBatchID	Analyte	QC Sample Type	Method	MDL	Result	Units	Qualifier
SV041204L	1,4-Dichlorobenzene	Method Blank	SW8270C	0.0029	0.0029	mg/L	U
SV041204L	2,4,5-Trichlorophenol	Method Blank	SW8270C	0.0035	0.0035	mg/L	U
SV041204L	2,4,6-Trichlorophenol	Method Blank	SW8270C	0.0022	0.0022	mg/L	U
SV041204L	2,4-Dinitrotoluene	Method Blank	SW8270C	0.00094	0.00094	mg/L	U
SV041204L	Cresols, Total	Method Blank	SW8270C	0.0085	0.0085	mg/L	U
SV041204L	Hexachlorobenzene	Method Blank	SW8270C	0.0018	0.0018	mg/L	U
SV041204L	Hexachlorobutadiene	Method Blank	SW8270C	0.0021	0.0021	mg/L	U
SV041204L	Hexachloroethane	Method Blank	SW8270C	0.0028	0.0028	mg/L	U
SV041204L	Nitrobenzene	Method Blank	SW8270C	0.0010	0.0010	mg/L	U
SV041204L	Pentachlorophenol	Method Blank	SW8270C	0.0032	0.0032	mg/L	U
SV041204L	Pyridine	Method Blank	SW8270C	0.0018	0.0018	mg/L	U

Surrogate(s)	Result	Units	% Recovery	Qualifier	Acceptance Limits
2-Fluorophenol	13	ug/L	26		20 - 119
Phenol-d6	9.9	ug/L	20		18 - 121
Nitrobenzene d5	34	ug/L	68		23 - 120
2-Fluorobiphenyl	41	ug/L	82		20 - 119
2,4,6-Tribromophenol	35	ug/L	70		15 - 112
p-Terphenyl-d14	48	ug/L	96		18 - 137

TCLP Volatile Organics							
QCBatchID	Analyte	QC Sample Type	Method	MDL	Result	Units	Qualifier
V040204A	1,1-Dichloroethene	Method Blank	SW8260B	0.00050	0.00050	mg/L	U
V040204A	1,2-Dichloroethane	Method Blank	SW8260B	0.00036	0.00036	mg/L	U
V040204A	1,4-Dichlorobenzene	Method Blank	SW8260B	0.00030	0.00030	mg/L	U
V040204A	Benzene	Method Blank	SW8260B	0.00030	0.00030	mg/L	U
V040204A	Carbon Tetrachloride	Method Blank	SW8260B	0.00039	0.00039	mg/L	U

Advanced Environmental Laboratories, Inc.
Analytical Report

Client: Howco, Inc.

Report No.: T043005

Project Name: Annual Compliance

Date/Time Received: 3/26/04 12:40

V040204A	Chlorobenzene	Method Blank	SW8260B	0.00031	0.00031	mg/L	U
V040204A	Chloroform	Method Blank	SW8260B	0.00041	0.00041	mg/L	U
V040204A	Methyl ethyl ketone	Method Blank	SW8260B	0.00025	0.00025	mg/L	U
V040204A	Tetrachloroethene	Method Blank	SW8260B	0.00043	0.00043	mg/L	U
V040204A	Trichloroethene	Method Blank	SW8260B	0.00043	0.00043	mg/L	U
V040204A	Vinyl Chloride	Method Blank	SW8260B	0.00049	0.00049	mg/L	U
Surrogate(s)	Result	Units	% Recovery	Qualifier	Acceptance Limits		
1,2-Dichloroethane-d4	59	ug/L	118		80 - 120		
Toluene d(8)	51	ug/L	102		88 - 110		
4-Bromofluorobenzene	54	ug/L	108		86 - 115		

Quality Assurance Qualifiers:

- i The reported value is between the laboratory method detection limit and the laboratory practical quantitation limit.
U The compound was analyzed for but not detected.

The estimated measurements of uncertainty can be provided upon request

This is the last page of the analytical report.



21-APR-04

Advanced Environmental Laboratories, Inc.
6601 Southpoint Pkwy.
Jacksonville, FL 32216
Client Contact: Walter Kronz

Reference: Accura Analytical Laboratory, Inc. (AAL) Work Order No: 5929
Project Name : AEL General Project
Project Number:

Dear Walter Kronz :

We are reporting to you the results of the analyses performed on the samples received under the project name referenced above and identified with the Chain of Custody(s) Numbered NA . All results being reported under this Chain of Custody apply to the samples analyzed and properly identified with an AAL Sample ID number.

All the results for the quality control samples were reviewed. Also, all parameters for data reduction and validation were reviewed. In view of this, we are able to release the analytical data for this report within acceptance criteria for accuracy, precision, completeness or properly flagged.

The validity and integrity of this report will remain intact as long as it is accompanied by this letter and reproduced in full, unless written approval is granted by AAL. This report will be filed for at least 7 years in our archives after which time it will be destroyed without further notice, unless otherwise arranged with you. The samples received, and described as recorded in COC No. NA will be filed for 90 days, and after that time they will be properly disposed without further notice, unless otherwise arranged with you. We reserve the right to return to you any unused samples, extracts or solutions related to them if we consider so necessary (e.g., samples identified as hazardous waste, sample sizes exceeding analytical standard practices, controlled substances under regulated protocols, etc).

We thank you for selecting Accura Analytical Laboratory Inc. to serve your analytical needs. If you have any questions concerning this report, please feel free to contact me at any time.

Sincerely,

David Fuller
Project Manager

6017 Financial Drive Norcross, GA 30071
Phone: 770-449-8800 Fax: 770-449-5477





ACCURA ANALYTICAL LABORATORY, INC. (AAL)
6017 Financial Drive, Norcross, Georgia, 30071, Phone (770) 449-8800
FL Certification #E87429 LA Certification #04079 NC Certification #483
SC Certification #98015 USACE-MRD Approved
Case Narrative

AAL Work Order # 5929

Client Project: none given

Accura Analytical Laboratory Inc. certifies that the results meet all requirements of the NELAC Standards.

The data package includes a 1 page case narrative, 1 report page, 2 QC surrogate recovery pages, 1 QC Blank Spike recovery page, and a list of common EPA qualifier codes.

The following items were noted concerning this work order:

TCLP Herbicides by SW1311/8151A Notations:

1. The blank spike recoveries were outside the laboratory-derived limit. The samples were re-extracted and results were confirmed.

Mei Liang
Mei Liang
PEST/PCB Analyst

April 20, 2004
Date

These Case Narrative Notations have been generated, reviewed, and edited by:

David C. Fuller
David C. Fuller
VP - Client Services

April 21, 2004
Date



Certificate of Analytical Results 5929

Advanced Environmental Laboratories, Inc., Jacksonville, FL
AEL General Project

Sample Id: T043005-1	Matrix: SOIL	% Moisture:
Lab Sample Id: 5929-001	Date Collected: Mar-26-04 09:30	Date Received: Apr-06-04 09:35
Sample Depth:		

Analytical Method: TCLP Herbicides by SW1311/8151A					Prep Method: EXT_SW8151		
Date Analyzed: Apr-14-04 18:17		Analyst: MJL01		Date Prep: Apr-06-04 15:40		Tech: NRO01	
Seq Number: 21606							
Parameter	Cas Number	Result	Rep Limit	MDL	Units	Flag	Dil
2,4,5-TP (Silvex)	93-72-1	BRL	0.0040	0.0000025	mg/L		1
2,4-D	94-75-7	BRL	0.0040	0.0000038	mg/L		1

Sample Id: MB-TCLP Extraction Fluid	Matrix: LIQUID	% Moisture:
Lab Sample Id: 5929-002	Date Collected: Mar-30-04 17:00	Date Received: Apr-06-04 09:35
Sample Depth:		

Analytical Method: TCLP Herbicides by SW1311/8151A					Prep Method: EXT_SW8151		
Date Analyzed: Apr-14-04 18:41		Analyst: MJL01		Date Prep: Apr-06-04 15:40		Tech: NRO01	
Seq Number: 21606							
Parameter	Cas Number	Result	Rep Limit	MDL	Units	Flag	Dil
2,4,5-TP (Silvex)	93-72-1	BRL	0.0040	0.0000025	mg/L		1
2,4-D	94-75-7	BRL	0.0040	0.0000038	mg/l.		1

Sample Id: 18581 BLK	Matrix: WATER	% Moisture:
Lab Sample Id: 18581 BLK	Date Collected:	Date Received:
Sample Depth:		

Analytical Method: TCLP Herbicides by SW1311/8151A					Prep Method: EXT_SW8151		
Date Analyzed: Apr-14-04 14:36		Analyst: MJL01		Date Prep: Apr-06-04 15:40		Tech: NRO01	
Seq Number: 21606							
Parameter	Cas Number	Result	Rep Limit	MDL	Units	Flag	Dil
2,4,5-TP (Silvex)	93-72-1	BRL	1.0	0.0010	mg/L		1
2,4-D	94-75-7	BRL	1.0	0.00099	mg/L		1



Form 2 - Surrogate Recoveries

Project Name: AEL General Project

Report Date: 04/21/04 09:25

Work Order #: 5929

Project ID:

Lab Batch #: 21606

Sample: 18581 BLK / BLK

Batch: 1 Matrix: W

Units: mg/L

SURROGATE RECOVERY STUDY					
TCLP Herbicides by SW1311/8151A	Amount Found [A]	True Amount [B]	Recovery %R [D]	Control Limits %R	Flags
Analytes					
2,4-Dichlorophenylacetic Acid	1.929	5.000	39	33-109	

Lab Batch #: 21606

Sample: 18581 BLK / BLK

Batch: 1 Matrix: W

Units: mg/L

SURROGATE RECOVERY STUDY					
TCLP Herbicides by SW1311/8151A	Amount Found [A]	True Amount [B]	Recovery %R [D]	Control Limits %R	Flags
Analytes					
2,4-Dichlorophenylacetic Acid	2.539	5.000	51	33-109	

Lab Batch #: 21606

Sample: 5929-001 / SMP

Batch: 1 Matrix: S

Units: mg/L

SURROGATE RECOVERY STUDY					
TCLP Herbicides by SW1311/8151A	Amount Found [A]	True Amount [B]	Recovery %R [D]	Control Limits %R	Flags
Analytes					
2,4-Dichlorophenylacetic Acid	0.003411	0.01000	34	6-127	

Lab Batch #: 21606

Sample: 5929-001 / SMP

Batch: 1 Matrix: S

Units: mg/L

SURROGATE RECOVERY STUDY					
TCLP Herbicides by SW1311/8151A	Amount Found [A]	True Amount [B]	Recovery %R [D]	Control Limits %R	Flags
Analytes					
2,4-Dichlorophenylacetic Acid	0.002992	0.01000	30	6-127	

Lab Batch #: 21606

Sample: 5929-002 / SMP

Batch: 1 Matrix: S

Units: mg/L

SURROGATE RECOVERY STUDY					
TCLP Herbicides by SW1311/8151A	Amount Found [A]	True Amount [B]	Recovery %R [D]	Control Limits %R	Flags
Analytes					
2,4-Dichlorophenylacetic Acid	0.005267	0.01000	53	6-127	

* Surrogate outside of Laboratory QC limits

** Surrogates outside limits; data and surrogates confirmed by reanalysis

*** Poor recoveries due to dilution

Surrogate Recovery [D] = $100 \times A / B$

All results are based on MDL and validated for QC purposes.

Z = Surrogate Recovery exceeded the Laboratory QC limits



Form 2 - Surrogate Recoveries

Project Name: AEL General Project

Report Date: 04/21/04 09:25

Work Order #: 5929

Project ID:

Lab Batch #: 21606

Sample: 5929-002 / SMP

Batch: 1 Matrix: S

Units: mg/L

SURROGATE RECOVERY STUDY

TCLP Herbicides by SW1311/8151A Analytes	Amount Found [A]	True Amount [B]	Recovery %R [D]	Control Limits %R	Flags
2,4-Dichlorophenylacetic Acid	0.006723	0.01000	67	6-127	

* Surrogate outside of Laboratory QC limits

** Surrogates outside limits; data and surrogates confirmed by reanalysis

*** Poor recoveries due to dilution

Surrogate Recovery [D] = $100 \cdot A / B$

All results are based on MDL and validated for QC purposes.

Z = Surrogate Recovery exceeded the Laboratory QC limits



BS / BSD Recoveries

Project Name: AEL General Project

Report Date 04/21/04 09:25

Work Order #: 5929

Project ID:

Lab Batch ID: 21606

Sample: 18581 BKS

Batch #: 1

Matrix: W

Units: mg/L

BLANK /BLANK SPIKE / BLANK SPIKE DUPLICATE RECOVERY STUDY												
Units: mg/L		Blank Sample Result [A]	Spike Added [B]	Blank Spike Result [C]	Blank Spike %R [D]	Spike Added [E]	Blank Spike Duplicate Result [F]	Blank Spike Dup. %R [G]	RPD %	Control Limits %R	Control Limits %RPD	Flag
TCLP Herbicides by SW1311/8151A												
Analytes												
2,4,5-TP (Silvex)		<1.0	5.0	<1.0	0	5.0	1.9	38	200	48-109	30	ZF
2,4-D		<1.0	5.0	<1.0	0	5.0	1.9	38	200	10-129	30	ZF

Lab Batch ID: 21608

Sample: 18614 BKS

Batch #: 1

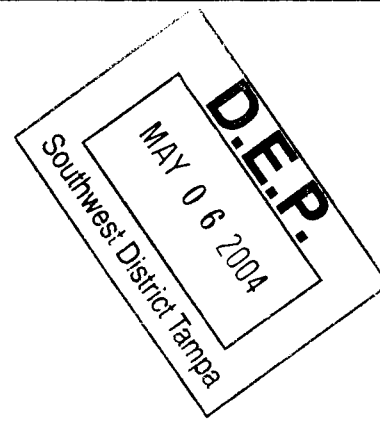
Matrix: W

Units: mg/L

BLANK /BLANK SPIKE / BLANK SPIKE DUPLICATE RECOVERY STUDY												
Units: mg/L												
TCLP Herbicides by SW1311/8151A		Blank Sample Result [A]	Spike Added [B]	Blank Spike Result [C]	Blank Spike %R [D]	Spike Added [E]	Blank Spike Duplicate Result [F]	Blk. Spk Dup. %R [G]	RPD %	Control Limits %R	Control Limits %RPD	Flag
Analytes												
2,4,5-TP (Silvex)		<1.0	5.0	2.6	52	5.0	2.6	52	0	48-109	30	
2,4-D		<1.0	5.0	2.5	50	5.0	2.5	50	0	10-129	30	

Relative Percent Difference RPD = $200 * ((D-G)/(D+G))$
Blank Spike Recovery [D] = $100 * (C/B)$
Blank Spike Duplicate Recovery [G] = $100 * (F/E)$
All results are based on MDL and Validated for QC Purposes
F = RPD exceeded the laboratory control limits

Version: 1%





Accura Analytical Laboratory

EPA Defined Qualifiers Codes

- BRL: This abbreviation indicates that the analytical results were Below the Reporting Limit (BRL).
- U: The compound was analyzed for but not detected.
- J: This indicates an estimated value. This flag is used in 3 incidences.
- (1) When estimating a concentration for tentatively identified compounds where 1:1 response is assumed.
 - (2) When the mass spectral and retention time data indicate the presence of a compound that meets the volatile and semivolatile GC/MS identification criteria, and the result is less than the Contract Required Detection Limit (CRDL) – or Reporting Limit - but greater than the MDL.
 - (3) When the retention time data indicate the presence of a compound that meets the pesticide/Aroclor identification criteria, and the result is less than the CRQL – or Reporting Limit- but greater than MDL.
- N: Indicates presumptive evidence of a compound. This flag is only used for tentatively identified compounds. (TICs), where the identification is based on a mass spectral library search. For generic characterization of a TIC, such as chlorinated hydrocarbon, the "N" flag is not used.
- P: This is used for a pesticide/Aroclor target analyte when there is greater than 25% difference for detected concentrations between the two GC columns. The lower of the two values is reported and flagged with "P"
- C: This applies to pesticide result where the identification has been confirmed by GC/MS. Do not apply if this flag if analyte(s) were not confirmed. Used the laboratory-defined flag instead (see the X qualifier).
- B: This is used when the analyte is found in the associated method blank as well as in the sample. It indicates probable bank contamination and warns the data user to take appropriate action. The flag shall be used for a tentatively identified compound as well as for a positively identified target compound.
- E: This identifies compounds whose concentrations exceed the upper level of the linear calibration range of the instrument for that specific analysis. If one or more compounds have a response greater than the upper level of the calibration range, the sample or extract should be diluted and re-analyzed.
- Note: For Total xylene, where three isomers are quantified as two peaks, the calibration range of each peak should be considered separately.*
- X: Defined by the laboratory
- Z: Surrogates/Spikes results exceeds quality control limits
- ZZ: Surrogates/Spikes results exceeds quality control limits in multiple samples
- ***: Surrogate recoveries were diluted out
- M: Manual integrations were necessary and an "m" qualifying code is present on the quantitation report next to the analyte.
- D: This flag indicates that the identified compound is reported from the dilution run.



LAB NUMBER: ~~44-397~~ me.

Linsys 10: 12736

Page _____ of _____

CLIENT NAME:		PROJECT NAME:		P.O. NUMBER / PROJECT NUMBER:		PROJECT LOCATION:		SAMPLED BY:		TURN AROUND TIME:		REMARKS / SPECIAL INSTRUCTIONS:		SAMPLE ID		SAMPLE DESCRIPTION		Grab Composite		SAMPLING DATE		SAMPLING TIME		MATRIX		NO. CONT.		OIL		A=air		SO=soil		SL=sludge		Preserv		AR		AN		AQ		LY		SR		IE		DS		L		A		B		N		U		M		B		E		R	
AEL Tampa		PROJECT NAME:		P.O. NUMBER / PROJECT NUMBER:		PROJECT LOCATION:		SAMPLED BY:		TURN AROUND TIME:		REMARKS / SPECIAL INSTRUCTIONS:		SAMPLE ID		SAMPLE DESCRIPTION		Grab Composite		SAMPLING DATE		SAMPLING TIME		MATRIX		NO. CONT.		OIL		A=air		SO=soil		SL=sludge		Preserv		AR		AN		AQ		LY		SR		IE		DS		L		A		B		N		U		M		B		E		R	
ADDRESS:		PROJECT NAME:		P.O. NUMBER / PROJECT NUMBER:		PROJECT LOCATION:		SAMPLED BY:		TURN AROUND TIME:		REMARKS / SPECIAL INSTRUCTIONS:		SAMPLE ID		SAMPLE DESCRIPTION		Grab Composite		SAMPLING DATE		SAMPLING TIME		MATRIX		NO. CONT.		OIL		A=air		SO=soil		SL=sludge		Preserv		AR		AN		AQ		LY		SR		IE		DS		L		A		B		N		U		M		B		E		R	
PHONE:		PROJECT NAME:		P.O. NUMBER / PROJECT NUMBER:		PROJECT LOCATION:		SAMPLED BY:		TURN AROUND TIME:		REMARKS / SPECIAL INSTRUCTIONS:		SAMPLE ID		SAMPLE DESCRIPTION		Grab Composite		SAMPLING DATE		SAMPLING TIME		MATRIX		NO. CONT.		OIL		A=air		SO=soil		SL=sludge		Preserv		AR		AN		AQ		LY		SR		IE		DS		L		A		B		N		U		M		B		E		R	
CONTACT:		PROJECT NAME:		P.O. NUMBER / PROJECT NUMBER:		PROJECT LOCATION:		SAMPLED BY:		TURN AROUND TIME:		REMARKS / SPECIAL INSTRUCTIONS:		SAMPLE ID		SAMPLE DESCRIPTION		Grab Composite		SAMPLING DATE		SAMPLING TIME		MATRIX		NO. CONT.		OIL		A=air		SO=soil		SL=sludge		Preserv		AR		AN		AQ		LY		SR		IE		DS		L		A		B		N		U		M		B		E		R	
TURN AROUND TIME:		PROJECT NAME:		P.O. NUMBER / PROJECT NUMBER:		PROJECT LOCATION:		SAMPLED BY:		TURN AROUND TIME:		REMARKS / SPECIAL INSTRUCTIONS:		SAMPLE ID		SAMPLE DESCRIPTION		Grab Composite		SAMPLING DATE		SAMPLING TIME		MATRIX		NO. CONT.		OIL		A=air		SO=soil		SL=sludge		Preserv		AR		AN		AQ		LY		SR		IE		DS		L		A		B		N		U		M		B		E		R	
TURN AROUND TIME:		PROJECT NAME:		P.O. NUMBER / PROJECT NUMBER:		PROJECT LOCATION:		SAMPLED BY:		TURN AROUND TIME:		REMARKS / SPECIAL INSTRUCTIONS:		SAMPLE ID		SAMPLE DESCRIPTION		Grab Composite		SAMPLING DATE		SAMPLING TIME		MATRIX		NO. CONT.		OIL		A=air		SO=soil		SL=sludge		Preserv		AR		AN		AQ		LY		SR		IE		DS		L		A		B		N		U		M		B		E		R	
TURN AROUND TIME:		PROJECT NAME:		P.O. NUMBER / PROJECT NUMBER:		PROJECT LOCATION:		SAMPLED BY:		TURN AROUND TIME:		REMARKS / SPECIAL INSTRUCTIONS:		SAMPLE ID		SAMPLE DESCRIPTION		Grab Composite		SAMPLING DATE		SAMPLING TIME		MATRIX		NO. CONT.		OIL		A=air		SO=soil		SL=sludge		Preserv		AR		AN		AQ		LY		SR		IE		DS		L		A		B		N		U		M		B		E		R	
TURN AROUND TIME:		PROJECT NAME:		P.O. NUMBER / PROJECT NUMBER:		PROJECT LOCATION:		SAMPLED BY:		TURN AROUND TIME:		REMARKS / SPECIAL INSTRUCTIONS:		SAMPLE ID		SAMPLE DESCRIPTION		Grab Composite		SAMPLING DATE		SAMPLING TIME		MATRIX		NO. CONT.		OIL		A=air		SO=soil		SL=sludge		Preserv		AR		AN		AQ		LY		SR		IE		DS		L		A		B		N		U		M		B		E		R	
TURN AROUND TIME:		PROJECT NAME:		P.O. NUMBER / PROJECT NUMBER:		PROJECT LOCATION:		SAMPLED BY:		TURN AROUND TIME:		REMARKS / SPECIAL INSTRUCTIONS:		SAMPLE ID		SAMPLE DESCRIPTION		Grab Composite		SAMPLING DATE		SAMPLING TIME		MATRIX		NO. CONT.		OIL		A=air		SO=soil		SL=sludge		Preserv		AR		AN		AQ		LY		SR		IE		DS		L		A		B		N		U		M		B		E		R	
TURN AROUND TIME:		PROJECT NAME:		P.O. NUMBER / PROJECT NUMBER:		PROJECT LOCATION:		SAMPLED BY:		TURN AROUND TIME:																																																											

p. 14

Chain-of-Custody for AEL Tampa to AEL Jax

AEL Tampa
5810-D Breckinridge Parkway
Tampa, FL 33610
813-630-9616 Fax 813-630-4327
Contact Person: Michael Cammarata

AEL Jax
6601 Southpoint Parkway
Jacksonville, FL 32216
904-363-9350 Fax 904-363-9354
Contact Person: Sean Hyde

Project #: T043005

CustomerName: Howco, Inc.

Collector: James Jones

Check if Rush

☐

Lab Code	Client Sample ID	Test	Matrix	Collect Date / Time	Receive Date	Due Date	# Bottles	Bottle Type (Pres.)
T043005-01	WWTS	Hg (TCLP)	Soil	3/26/2004 9:30	3/26/04 12:40	4/9/2004		
T043005-01	WWTS	TCLP ICP Metals	Soil	3/26/2004 9:30	3/26/04 12:40	4/9/2004		
T043005-01	WWTS	TCLP Semi-Volatiles	Soil	3/26/2004 9:30	3/26/04 12:40	4/9/2004		
T043005-01	WWTS	TCLP Volatiles	Soil	3/26/2004 9:30	3/26/04 12:40	4/9/2004		
T043005-01	WWTS	TCLP Volatiles	Soil	3/26/2004 9:30	3/26/04 12:40	4/9/2004		
T043005-01	WWTS	TCLP Pesticides	So	3/26/04 9:30	3/26/04 12:40			

Tampa Relinquisher:

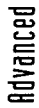
Shipping Relinquisher:

Shipping Receiver:

Jacksonville Receiver:

Date/Time:

Date/Time:



CHAIN OF CUSTODY RECORD

LAB NUMBER: 1043005

Page 16 of 15

[illegible]



**Advanced
Environmental Laboratories, Inc.**

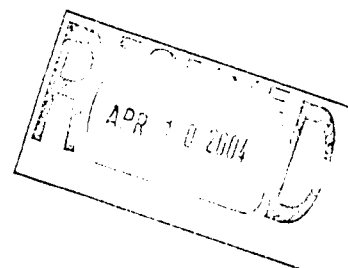
9610 Princess Palm Avenue
Tampa, Florida 33619
(813) 630-9616
FAX (813) 630-4327

Client: Howco, Inc.
Project Name: Annual Compliance
Project Number: 31483

Report No.: T043190
Date Sampled: 4/1/04
Date Received: 4/1/04 12:35
Date Reported: 4/28/04

Attention: Richard Dillen
Phone Number: 727-328-7403

Address: 3701 Central Ave.
St. Petersburg, FL 33713



Project Description

The analytical results for the samples contained in this report were submitted for analysis as outlined by the Chain of Custody.

Project Name: Annual Compliance

Approved By:

Nissa Mulnick, QA Deputy

If you have any questions, the above named should be contacted.

Advanced Environmental Laboratories certifies that the test results in this report meet all requirements of the NELAC standards, unless notated otherwise in the body of the report.

Total Number of Pages = 15

Advanced Environmental Laboratories, Inc.

Analytical Report

Client: Howco, Inc.

Project Name: Annual Compliance

Report No.: T043190-01

Date/Time Received: 4/1/04 12:35 PM

Lab Code: T043190-01

Date/Time Sampled: 4/1/04 9:30

Client Sample ID: 1

Shipping Method: AEL Pick-up

Site: WWTS

Sampled By: James Jones

Matrix: Soil

Sampling Method: G

TCLP Metals

Analytes:	Dilution	Adjusted MDL	Adjusted PQL	Results	Units	Qualifier(s)	Method	Parameter Comment	Lab
Arsenic	1	0.041	0.16	0.041	mg/L	U	SW6010B		J
Barium	1	0.0023	0.0092	0.084	mg/L	V	SW6010B		J
Cadmium	1	0.00057	0.0023	0.00057	mg/L	U	SW6010B		J
Chromium	1	0.0018	0.0072	0.0022	mg/L	i	SW6010B		J
Lead	1	0.0067	0.027	0.0071	mg/L	i, V	SW6010B		J
Selenium	1	0.044	0.18	0.044	mg/L	U	SW6010B		J
Silver	1	0.019	0.076	0.019	mg/L	U	SW6010B		J

TCLP Metals (Hg)

Analytes:	Dilution	Adjusted MDL	Adjusted PQL	Results	Units	Qualifier(s)	Method	Parameter Comment	Lab
Mercury	1	0.00033	0.0013	0.00033	mg/L	U	SW7470A		J

TCLP Pesticides

Analytes:	Dilution	Adjusted MDL	Adjusted PQL	Results	Units	Qualifier(s)	Method	Parameter Comment	Lab
Chlordane	10	2.0	7.8	2.0	ug/L	U	SW8081A		J
Endrin	10	0.14	0.56	0.14	ug/L	U	SW8081A		J
* Gamma-BHC (Lindane)	10	0.060	0.24	0.060	ug/L	U	SW8081A		J
Heptachlor	10	0.63	2.5	0.63	ug/L	U	SW8081A		J
Heptachlor Epoxide	10	0.13	0.52	0.13	ug/L	U	SW8081A		J
Methoxychlor	10	0.14	0.56	0.14	ug/L	U	SW8081A		J
Toxaphene	10	0.70	2.8	0.70	ug/L	U	SW8081A		J

TCLP Semi-Volatile Organic Compounds

Analytes:	Dilution	Adjusted MDL	Adjusted PQL	Results	Units	Qualifier(s)	Method	Parameter Comment	Lab
1,4-Dichlorobenzene	10	0.029	0.12	0.029	mg/L	U	SW8270C		J
2,4,5-Trichlorophenol	10	0.035	0.14	0.035	mg/L	U	SW8270C		J
2,4,6-Trichlorophenol	10	0.022	0.088	0.022	mg/L	U	SW8270C		J
2,4-Dinitrotoluene	10	0.0094	0.038	0.0094	mg/L	U	SW8270C		J
Cresols, Total	10	0.085	0.34	0.22	mg/L	i	SW8270C		J
Hexachlorobenzene	10	0.018	0.070	0.018	mg/L	U	SW8270C		J
Hexachlorobutadiene	10	0.021	0.084	0.021	mg/L	U	SW8270C		J
Hexachloroethane	10	0.028	0.11	0.028	mg/L	U	SW8270C		J
Nitrobenzene	10	0.010	0.040	0.010	mg/L	U	SW8270C		J
Pentachlorophenol	10	0.032	0.13	0.032	mg/L	U	SW8270C		J
Pyridine	10	0.018	0.074	0.018	mg/L	U	SW8270C		J

TCLP Volatile Organics

Analytes:	Dilution	Adjusted MDL	Adjusted PQL	Results	Units	Qualifier(s)	Method	Parameter Comment	Lab
1,1-Dichloroethene	10	0.0050	0.020	0.0050	mg/L	U	SW8260B		J
1,2-Dichloroethane	10	0.0036	0.014	0.0036	mg/L	U	SW8260B		J
1,4-Dichlorobenzene	10	0.0030	0.012	0.0030	mg/L	U	SW8260B		J
Benzene	10	0.0030	0.012	0.11	mg/L		SW8260B		J
Carbon Tetrachloride	10	0.0039	0.016	0.0039	mg/L	U	SW8260B		J
Chlorobenzene	10	0.0031	0.012	0.0031	mg/L	U	SW8260B		J

Advanced Environmental Laboratories, Inc.

Analytical Report

Client: Howco, Inc.

Report No.: T043190

Project Name: Annual Compliance

Date/Time Received: 4/1/04 12:35

Chloroform	10	0.0041	0.016	0.0041	mg/L	U	SW8260B	J
Methyl ethyl ketone	10	0.0025	0.010	0.11	mg/L		SW8260B	J
Tetrachloroethene	10	0.0043	0.017	0.030	mg/L		SW8260B	J
Trichloroethene	10	0.0043	0.017	0.0043	mg/L	U	SW8260B	J
Vinyl Chloride	10	0.0049	0.020	0.0049	mg/L	U	SW8260B	J

Surrogates:	Control Limits	% Recovery	Qual.	Method	Prep Method
Decachlorobiphenyl	30 - 120	23		SW8081A	SW1311/SW3510C
Tetrachloro-m-xylene	30 - 120	387	J4	SW8081A	SW1311/SW3510C
1,2-Dichloroethane-d4	80 - 120	96		SW8260B	SW1311/SW5030B
4-Bromofluorobenzene	86 - 115	100		SW8260B	SW1311/SW5030B
Toluene d(8)	88 - 110	100		SW8260B	SW1311/SW5030B
2,4,6-Tribromophenol	15 - 112	78		SW8270C	SW1311/SW3510C
2-Fluorobiphenyl	20 - 119	82		SW8270C	SW1311/SW3510C
2-Fluorophenol	20 - 119	34		SW8270C	SW1311/SW3510C
Nitrobenzene d5	23 - 120	78		SW8270C	SW1311/SW3510C
p-Terphenyl-d14	18 - 137	82		SW8270C	SW1311/SW3510C
Phenol-d6	18 - 121	23		SW8270C	SW1311/SW3510C

i The reported value is between the laboratory method detection limit and the laboratory practical quantitation limit.

J4 The sample matrix interfered with the ability to make an accurate determination.

U The compound was analyzed for but not detected.

V Indicates that the analyte was detected in both the sample and the associated method blank.

J DOH certification #E82574 (AEL-JAX) (FL NELAC certification)

* Comment for Gamma-BHC (Lindane) - Sample reran at 1:10 dilution on 4/13/04 with sequence C041304 due to matrix interference

Advanced Environmental Laboratories, Inc.

Analytical Report

Client: Howco, Inc.

Report No.: T043190

Project Name: Annual Compliance

Date/Time Received: 4/1/04 12:35

Sample Cross Reference Information

Lab Code: T043190-01

Site: WWTS

Client Sample Number: 1

Matrix: Soil

Test Description	Analysis Method	Prep Method	Analytical Batch ID	Analysis Date/Time	Analyst	Prep Batch ID	Prep Date/Time
TCLP Extraction (Non-Volatile)	SW1311	NONE				oe040704tdp	4/7/04 5:00:00 P
TCLP Extraction (Volatile)	SW1311	NONE				oe040704tdp	4/7/04 5:00:00 P
TCLP Herbicides	SW8151A	SW1311/METHOD					
TCLP Metals	SW6010B	SW1311/SW3010A	M041204-3010-2	4/12/04 15:31	KC	M041204-3010-2	4/12/04 8:15:00
TCLP Metals (Hg)	SW7470A	SW1311/METHOD	M040904-HG-5	4/9/04 13:17	TP	M040904-HG-5	4/9/04 4:30:00 A
TCLP Pesticides	SW8081A	SW1311/SW3510C	sv041204c-pp	4/12/04 19:34	MP	sv041204-pp	4/12/04 9:59:00
TCLP Semi-Volatile Organic Compounds	SW8270C	SW1311/SW3510C	SV041804L	4/18/04 13:24	JA	sv041304-bna	4/13/04 8:30:00
TCLP Volatile Organics	SW8260B	SW1311/SW5030B	V041204A	4/12/04 10:27	BB	V041204A	

If the Analytical Batch ID and Prep Batch ID is null, the analysis was not performed by AEL, and the original report from the subcontracted laboratory will be provided containing this information.

Advanced Environmental Laboratories, Inc.

Analytical Report

Client: Howco, Inc.

Project Name: Annual Compliance

Report No.: T043190

Date/Time Received: 4/1/04 12:35

Quality Assurance Report

Method Blanks

TCLP Metals (Hg)							
QCBatchID	Analyte	QC Sample Type	Method	MDL	Result	Units	Qualifier
M040904-HG-5	Mercury	Method Blank	SW7470A	0.00033	0.00033	mg/L	U

TCLP Metals							
QCBatchID	Analyte	QC Sample Type	Method	MDL	Result	Units	Qualifier
M041204-3010-2	Arsenic	Method Blank	SW6010B	0.041	0.041	mg/L	U
M041204-3010-2	Barium	Method Blank	SW6010B	0.0023	0.0094	mg/L	U
M041204-3010-2	Cadmium	Method Blank	SW6010B	0.00057	0.00057	mg/L	U
M041204-3010-2	Chromium	Method Blank	SW6010B	0.0018	0.0018	mg/L	U
M041204-3010-2	Lead	Method Blank	SW6010B	0.0067	0.0088	mg/L	I
M041204-3010-2	Selenium	Method Blank	SW6010B	0.044	0.044	mg/L	U
M041204-3010-2	Silver	Method Blank	SW6010B	0.019	0.019	mg/L	U

TCLP Pesticides							
QCBatchID	Analyte	QC Sample Type	Method	MDL	Result	Units	Qualifier
sv041204c-pp	Chlordane	Method Blank	SW8081A	0.20	0.20	ug/L	U
sv041204c-pp	Endrin	Method Blank	SW8081A	0.014	0.014	ug/L	U
sv041204c-pp	Gamma-BHC (Lindane)	Method Blank	SW8081A	0.0060	0.0060	ug/L	U
sv041204c-pp	Heptachlor	Method Blank	SW8081A	0.063	0.063	ug/L	U
sv041204c-pp	Heptachlor Epoxide	Method Blank	SW8081A	0.013	0.013	ug/L	U
sv041204c-pp	Methoxychlor	Method Blank	SW8081A	0.014	0.014	ug/L	U
sv041204c-pp	Toxaphene	Method Blank	SW8081A	0.070	0.070	ug/L	U
Surrogate(s)	Result	Units	% Recovery	Qualifier	Acceptance Limits		
Tetrachloro-m-xylene	0.79	ug/L	79		30 - 120		
Decachlorobiphenyl	0.26	ug/L	53		30 - 120		

TCLP Semi-Volatile Organic Compounds							
QCBatchID	Analyte	QC Sample Type	Method	MDL	Result	Units	Qualifier
SV041804L	1,4-Dichlorobenzene	Method Blank	SW8270C	0.0029	0.0029	mg/L	U
SV041804L	2,4,5-Trichlorophenol	Method Blank	SW8270C	0.0035	0.0035	mg/L	U
SV041804L	2,4,6-Trichlorophenol	Method Blank	SW8270C	0.0022	0.0022	mg/L	U
SV041804L	2,4-Dinitrotoluene	Method Blank	SW8270C	0.00094	0.00094	mg/L	U
SV041804L	Cresols, Total	Method Blank	SW8270C	0.0085	0.0085	mg/L	U
SV041804L	Hexachlorobenzene	Method Blank	SW8270C	0.0018	0.0018	mg/L	U
SV041804L	Hexachlorobutadiene	Method Blank	SW8270C	0.0021	0.0021	mg/L	U
SV041804L	Hexachloroethane	Method Blank	SW8270C	0.0028	0.0028	mg/L	U
SV041804L	Nitrobenzene	Method Blank	SW8270C	0.0010	0.0010	mg/L	U
SV041804L	Pentachlorophenol	Method Blank	SW8270C	0.0032	0.0032	mg/L	U
SV041804L	Pyridine	Method Blank	SW8270C	0.0018	0.0018	mg/L	U
Surrogate(s)	Result	Units	% Recovery	Qualifier	Acceptance Limits		
2-Fluorophenol	11	ug/L	21		20 - 119		
Phenol-d6	9.6	ug/L	19		18 - 121		
Nitrobenzene d5	40	ug/L	79		23 - 120		
2-Fluorobiphenyl	41	ug/L	83		20 - 119		
2,4,6-Tribromophenol	22	ug/L	43		15 - 112		
p-Terphenyl-d14	39	ug/L	78		18 - 137		

TCLP Volatile Organics							
QCBatchID	Analyte	QC Sample Type	Method	MDL	Result	Units	Qualifier
V041204A	1,1-Dichloroethene	Method Blank	SW8260B	0.00050	0.00050	mg/L	U
V041204A	1,2-Dichloroethane	Method Blank	SW8260B	0.00036	0.00036	mg/L	U
V041204A	1,4-Dichlorobenzene	Method Blank	SW8260B	0.00030	0.00030	mg/L	U
V041204A	Benzene	Method Blank	SW8260B	0.00030	0.00030	mg/L	U
V041204A	Carbon Tetrachloride	Method Blank	SW8260B	0.00039	0.00039	mg/L	U

Advanced Environmental Laboratories, Inc.

Analytical Report

Client: Howco, Inc.

Report No.: T043190

Project Name: Annual Compliance

Date/Time Received: 4/1/04 12:35

V041204A	Chlorobenzene	Method Blank	SW8260B	0.00031	0.00031	mg/L	U
V041204A	Chloroform	Method Blank	SW8260B	0.00041	0.00041	mg/L	U
V041204A	Methyl ethyl ketone	Method Blank	SW8260B	0.00025	0.00025	mg/L	U
V041204A	Tetrachloroethene	Method Blank	SW8260B	0.00043	0.00043	mg/L	U
V041204A	Trichloroethene	Method Blank	SW8260B	0.00043	0.00043	mg/L	U
V041204A	Vinyl Chloride	Method Blank	SW8260B	0.00049	0.00049	mg/L	U

Surrogate(s)	Result	Units	% Recovery	Qualifier	Acceptance Limits
1,2-Dichloroethane-d4	49	ug/L	98		80 - 120
Toluene d(8)	51	ug/L	102		88 - 110
4-Bromofluorobenzene	51	ug/L	102		86 - 115

Quality Assurance Qualifiers:

- i The reported value is between the laboratory method detection limit and the laboratory practical quantitation limit.
- U The compound was analyzed for but not detected.

Definitions:

Water matrix refers to all aqueous matrices except drinking water, including but not limited to, wastewater, ground water, surface water, aqueous wastes and leach

Soil matrix refers to all non-aqueous matrices, including soils, solids, sludges, semi-solids, and non-aqueous waste samples

All results in mg/kg or % are reported in dry weight basis, unless notated otherwise. All results in mg/L are reported in wet weight basis.

MDL Method Detection Limit, without correction for dilution or moisture content

Adjusted Reporting Limit is the MDL accounting for all dilutions and moisture content calculations.

PQL is defined to be 4 times the MDL, for all results qualified with a "i" qualifier.

Sampling Method; G=Grab, P=Pump, C=Composite

The estimated measurements of uncertainty can be provided upon request

This is the last page of the analytical report.



22-APR-04

Advanced Environmental Laboratories, Inc.
6601 Southpoint Pkwy.
Jacksonville, FL 32216
Client Contact: Walter Kronz

Reference: Accura Analytical Laboratory, Inc. (AAL) Work Order No: 5946
Project Name :JO43190
Project Number: JO43190

Dear Walter Kronz :

We are reporting to you the results of the analyses performed on the samples received under the project name referenced above and identified with the Chain of Custody(s) Numbered NA . All results being reported under this Chain of Custody apply to the samples analyzed and properly identified with an AAL Sample ID number.

All the results for the quality control samples were reviewed. Also, all parameters for data reduction and validation were reviewed. In view of this, we are able to release the analytical data for this report within acceptance criteria for accuracy, precision, completeness or properly flagged.

The validity and integrity of this report will remain intact as long as it is accompanied by this letter and reproduced in full, unless written approval is granted by AAL. This report will be filed for at least 7 years in our archives after which time it will be destroyed without further notice, unless otherwise arranged with you. The samples received, and described as recorded in COC No. NA will be filed for 90 days, and after that time they will be properly disposed without further notice, unless otherwise arranged with you. We reserve the right to return to you any unused samples, extracts or solutions related to them if we consider so necessary (e.g., samples identified as hazardous waste, sample sizes exceeding analytical standard practices, controlled substances under regulated protocols, etc).

We thank you for selecting Accura Analytical Laboratory Inc. to serve your analytical needs. If you have any questions concerning this report, please feel free to contact me at any time.

Sincerely,

David Fuller
Project Manager

6017 Financial Drive Norcross, GA 30071
Phone: 770-449-8800 Fax: 770-449-5477



ACCURA ANALYTICAL LABORATORY, INC. (AAL)
6017 Financial Drive, Norcross, Georgia, 30071, Phone (770) 449-8800
FL Certification #E87429 LA Certification #04079 NC Certification #483
SC Certification #98015 USACE-MRD Approved
Case Narrative

AAL Work Order # 5946

Client Project: JO43190 / JO43190

Accura Analytical Laboratory Inc. certifies that the results meet all requirements of the NELAC Standards.

The data package includes a 1 page case narrative, 1 report page, 2 QC surrogate recovery pages, and 1 QC Blank Spike / Blank Spike Duplicate recovery page.

Project Manager Notations:

No problems were encountered with this work order.

These Case Narrative Notations have been generated, reviewed, and edited by:

David C. Fuller
VP - Client Services

April 22, 2004

Date



Certificate of Analytical Results 5946

Advanced Environmental Laboratories, Inc., Jacksonville, FL
JO43190

Sample Id: TO43190	Matrix: SOIL	% Moisture:
Lab Sample Id: 5946-001	Date Collected: Apr-01-04 09:30	Date Received: Apr-09-04 09:25
Sample Depth:		

Analytical Method: TCLP Herbicides by SW1311/8151A			Prep Method: EXT_SW8151	
Date Analyzed: Apr-21-04 21:46		Analyst: MJL01	Date Prep: Apr-12-04 08:30	
		Seq Number: 21641	Tech: NRO01	

Parameter	Cas Number	Result	Rep Limit	MDL	Units	Flag	Dil
2,4,5-TP (Silvex)	93-72-1	BRL	0.0050	0.0000031	mg/L		1
2,4-D	94-75-7	BRL	0.0050	0.0000048	mg/L		1

Sample Id: TO43190 - MB	Matrix: LIQUID	% Moisture:
Lab Sample Id: 5946-002	Date Collected: Apr-07-04 17:00	Date Received: Apr-09-04 09:25
Sample Depth:		

Analytical Method: TCLP Herbicides by SW1311/8151A			Prep Method: EXT_SW8151	
Date Analyzed: Apr-21-04 22:10		Analyst: MJL01	Date Prep: Apr-12-04 08:30	
		Seq Number: 21641	Tech: NRO01	

Parameter	Cas Number	Result	Rep Limit	MDL	Units	Flag	Dil
2,4,5-TP (Silvex)	93-72-1	BRL	0.0050	0.0000031	mg/L		1
2,4-D	94-75-7	BRL	0.0050	0.0000048	mg/L		1

Sample Id: 18639 BLK	Matrix: SOIL	% Moisture:
Lab Sample Id: 18639 BLK	Date Collected:	Date Received:
Sample Depth:		

Analytical Method: TCLP Herbicides by SW1311/8151A			Prep Method: EXT_SW8151	
Date Analyzed: Apr-21-04 19:43	Analyst: MJL01	Date Prep: Apr-12-04 08:30	Tech: NRO01	
Seq Number: 21641				

Parameter	Cas Number	Result	Rep Limit	MDL	Units	Flag	Dil
2,4,5-TP (Silvex)	93-72-1	BRL	0.0010	0.00000060	mg/L		1
2,4-D	94-75-7	BRL	0.0010	0.0000010	mg/L		1



Form 2 - Surrogate Recoveries

Project Name: JO43190

Report Date: 04/22/04 17:14

Project ID: JO43190

Work Order #: 5946

Lab Batch #: 21641

Sample: 18639 BLK / BLK

Batch: 1 Matrix: S

Units: mg/L

SURROGATE RECOVERY STUDY					
TCLP Herbicides by SW1311/8151A	Amount Found [A]	True Amount [B]	Recovery %R [D]	Control Limits %R	Flags
Analytes					
2,4-Dichlorophenylacetic Acid	0.000002800	0.005000	55	33-109	

Lab Batch #: 21641

Sample: 18639 BLK / BLK

Batch: 1 Matrix: S

Units: mg/L

SURROGATE RECOVERY STUDY					
TCLP Herbicides by SW1311/8151A	Amount Found [A]	True Amount [B]	Recovery %R [D]	Control Limits %R	Flags
Analytes					
2,4-Dichlorophenylacetic Acid	0.000002900	0.005000	58	33-109	

Lab Batch #: 21641

Sample: 5946-001 / SMP

Batch: 1 Matrix: S

Units: mg/L

SURROGATE RECOVERY STUDY					
TCLP Herbicides by SW1311/8151A	Amount Found [A]	True Amount [B]	Recovery %R [D]	Control Limits %R	Flags
Analytes					
2,4-Dichlorophenylacetic Acid	0.01187	0.02500	47	6-127	

Lab Batch #: 21641

Sample: 5946-001 / SMP

Batch: 1 Matrix: S

Units: mg/L

SURROGATE RECOVERY STUDY					
TCLP Herbicides by SW1311/8151A	Amount Found [A]	True Amount [B]	Recovery %R [D]	Control Limits %R	Flags
Analytes					
2,4-Dichlorophenylacetic Acid	0.01435	0.02500	57	6-127	

Lab Batch #: 21641

Sample: 5946-002 / SMP

Batch: 1 Matrix: S

Units: mg/L

SURROGATE RECOVERY STUDY					
TCLP Herbicides by SW1311/8151A	Amount Found [A]	True Amount [B]	Recovery %R [D]	Control Limits %R	Flags
Analytes					
2,4-Dichlorophenylacetic Acid	0.01018	0.02500	41	6-127	

- * Surrogate outside of Laboratory QC limits
 - ** Surrogates outside limits; data and surrogates confirmed by reanalysis
 - *** Poor recoveries due to dilution
- Surrogate Recovery [D] = $100 \times A / B$
All results are based on MDL and validated for QC purposes.
Z = Surrogate Recovery exceeded the Laboratory QC limits



Form 2 - Surrogate Recoveries

Project Name: JO43190

Report Date: 04/22/04 17:14

Work Order #: 5946

Project ID: JO43190

Lab Batch #: 21641

Sample: 5946-002 / SMP

Batch: 1 Matrix: S

Units: mg/L

SURROGATE RECOVERY STUDY					
TCLP Herbicides by SW1311/8151A	Amount Found [A]	True Amount [B]	Recovery %R [D]	Control Limits %R	Flags
Analytes					
2,4-Dichlorophenylacetic Acid	0.01449	0.02500	58	6-127	

* Surrogate outside of Laboratory QC limits
** Surrogates outside limits; data and surrogates confirmed by reanalysis
*** Poor recoveries due to dilution
Surrogate Recovery [D] = $100 * A / B$
All results are based on MDL and validated for QC purposes.
Z = Surrogate Recovery exceeded the Laboratory QC limits



BS / BSD Recoveries

Project Name: JO43190

Work Order #: 5946

Report Date 04/22/04 12:43

Project ID: JO43190

Matrix: SOIL

Lab Batch ID: 21641

Sample: 18639 BLK

Batch #: 1

Units: mg/L

TCLP Herbicides by SW131/8151A		BLANK / BLANK SPIKE / BLANK SPIKE DUPLICATE RECOVERY STUDY									
Analytes	Blank Sample Result [A]	Spike Added [B]	Blank Spike Result [C]	Blank Spike %R [D]	Spike Added [E]	Blank Spike Duplicate Result [F]	Blk. Spk Dup. %R [G]	RPD %	Control Limits %R	Control Limits %RPD	Flag
2,4,5-TP (Silvex)	<0.0010	0.0025	0.0018	72	0.0025	0.0017	68	6	48-109	20	
2,4-D	<0.0010	0.0025	0.0019	76	0.0025	0.0019	76	0	10-129	20	

Relative Percent Difference RPD = $200 \times (D-G)/(D+G)$

Blank Spike Recovery [D] = $100 \times (C)/[B]$

Blank Spike Duplicate Recovery [G] = $100 \times (F)/[E]$

All results are based on MDL and Validated for QC Purposes

F = RPD exceeded the laboratory control limits

2/2

Chain-of-Custody for AEL Tampa to AEL Jax

AEL Tampa
5810-D Breckinridge Parkway
Tampa, FL 33610
813-630-9616 Fax 813-630-4327
Contact Person: Michael Cammarata

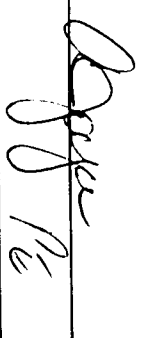
AEL Jax
6601 Southpoint Parkway
Jacksonville, FL 32216
904-363-9350 Fax 904-363-9354
Contact Person: Sean Hyde

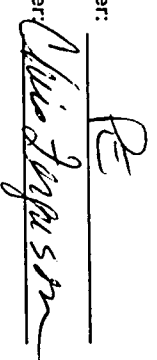
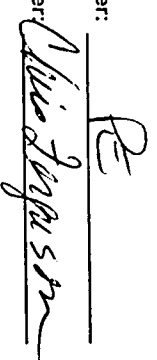
213

Project #: T043190
CustomerName: Howco, Inc.
Collector: James Jones

☐ Check if Rush

Lab Code	Client Sample ID	Test	Matrix	Collect Date / Time	Receive Date	Due Date	# Bottles	Bottle Type (Pres.)
T043190-01	1	Hg (TCLP)	Soil	4/1/2004 9:30	4/1/04 12:35	4/15/2004	___	4oz. Glass Jar
T043190-01	1	TCLP ICP Metals	Soil	4/1/2004 9:30	4/1/04 12:35	4/15/2004	___	8oz. Glass Jar
T043190-01	1	TCLP Semi-Volatiles	Soil	4/1/2004 9:30	4/1/04 12:35	4/15/2004	___	8oz. Glass Jar
T043190-01	1	TCLP Volatiles	Soil	4/1/2004 9:30	4/1/04 12:35	4/15/2004	___	8oz. Glass Jar
T043190-01	1	TCLP Volatiles	Soil	4/1/2004 9:30	4/1/04 12:35	4/15/2004	___	8oz. Glass Jar

Tampa Relinquisher: 
Shipping Relinquisher: _____

Shipping Receiver: 
Jacksonville Receiver: 

Date/Time: 4/1/04 1600
Date/Time: 4-2-04 0800



Advanced
Environmental Laboratories, Inc.
6601 Southpoint Parkway, Jacksonville, FL 32216 • (904) 363-9350 Fax (904) 363-9354
Jacksonville
6601 Southpoint Parkway, Tampa, FL 33619 • (813) 630-9616 Fax (813) 630-4327
Tampa
9610 Princess Palm Avenue, Gainesville, FL 32606 • (352) 367-1500 Fax (352) 367-0050
Gainesville

CHAIN OF CUSTODY RECORD

W 21C

LAB NUMBER: W0 # 5946

Page 1 of 1

CLIENT NAME: <u>AEL-JAX</u>		PROJECT NAME: <u>7043190</u>																
ADDRESS: <u>14001 Southpoint Hwy</u>		P.O. NUMBER / PROJECT NUMBER:																
PHONE: <u>904 363-9350</u> FAX:		PROJECT LOCATION:																
CONTACT: <u>BOB DEMPSEY</u>		SAMPLED BY:																
TURN AROUND TIME:		REMARKS / SPECIAL INSTRUCTIONS: <u>SAMPLE HAS BEEN ROTATED</u> <u>METHOD BLANK INCLUDED.</u>																
☒ STANDARD																		
☐ RUSH																		
WW - waste water	SW - surface water	GW - ground water	DW - drinking water	OIL	A - air	SO - soil	SL - sludge	Preserv										
SAMPLE ID	SAMPLE DESCRIPTION			Grab Composite	DATE	SAMPLING TIME	MATRIX	NO. CONT.	BOTTLE SIZE & TYPE	LAB NUMBER								
1	7043190			G	4/1/04	9:30	SO	1										
1	7043190-MB			G	4/7/04		L	1										
<u>Handwritten notes:</u> <u>Accurate</u> <u>Yp</u> <u>NaCCO3</u>																		
Relinquished by: <u>Chris Ziegler</u> Date: <u>4/6/04</u> Time: <u>0725</u>																		
Received by: <u>Indra</u> Date: <u>4/6/04</u> Time: <u>0725</u>																		

CHAIN OF CUSTODY RECORD

LAB NUMBER: T 2 / 2 1 3 2

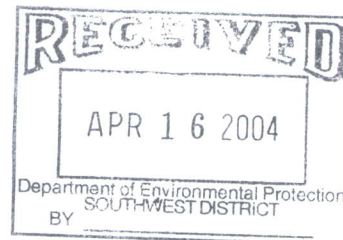
Jacksonsville: 6601 Southpoint Parkway, Jacksonville, FL 32216 • (904) 363-9350 Fax (904) 363-9354
 Tampa: 5810-D Breckenridge Parkway, Tampa, FL 33610 • (813) 630-9616 Fax (813) 630-4327
 Gainesville: 2106 NW 67th Place, Suite 7, Gainesville, FL 32606 • (352) 367-1500 Fax (352) 367-0050

Page 15 of 15



April 14, 2004

Mr. Stanley Tam
Florida Dept. of Environmental Protection
Southwest District
3804 Coconut Palm Drive
Tampa, FL 33619



RE: Permit # 92465-HO06-001

Dear Mr. Tam:

Please find enclosed the following documents:

- Updated pages 9 and 15 of the Application Form
- Updated Table 3-1
- Updated Secondary Containment calculations
- Updated drawings D-4-1, D-4-2, D-6-1, D-8-1, D-8-2, D-10-1

If you have any questions, please do not hesitate to contact me at tel. 727-328-7403.

Sincerely,

Richard Dillen
Quality Assurance Officer
HOWCO Env. Services

Enclosures (4)

cc: Mr. Bill Parker, FDEP-Tallahassee
Mr. Tim Hagan, HOWCO Env. Services

*Updated pages are in
the facility's permit
application notebook on shelf.*

File: 3-F

18/04



Jeb Bush
Governor

Department of Environmental Protection

Southwest District
3804 Coconut Palm Drive
Tampa, Florida 33619

David B. Struhs
Secretary

Mr. Tim Hagan, President
Hagan Holding Company dba HOWCO Environmental Services
3701 Central Avenue
St. Petersburg, Florida 33713

January 20, 2004

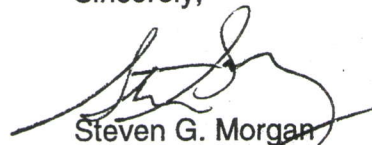
RE: HOWCO Environmental Services Solid Waste Processing Facility
Financial Assurance Cost Estimates
Permit No.: 92465-HO06-001, Pinellas County

Dear Mr. Hagan:

This letter is to acknowledge receipt of the inflation-adjusted cost estimates dated January 13, 2004 (received January 14, 2004), for closing of the HOWCO Environmental Services Solid Waste Processing Facility. The inflation-adjusted cost estimates received January 14, 2004 (total for closure \$63,924.85), are **APPROVED for 2004**. The approved estimates are for a total of approximately 22,000 gallons of material at the site at any time. The next annual update (revised or inflation-adjusted estimates) is due no later than March 1, 2005.

A copy of these estimates will be forwarded to Mr. Fred Wick, Solid Waste Section, FDEP, 2600 Blair Stone Road, Tallahassee, Florida 32399-2407. Please work with him directly to assess the facility's compliance with the funding mechanism requirements of Rule 62-701.630, F.A.C. If you have any questions, you may contact me at (813) 744-6100 ext. 385.

Sincerely,



Steven G. Morgan
Solid Waste Section
Southwest District

sgm
cc:

Deb Bush, Pinellas County SW, 3095 114th Ave. N. St. Petersburg, Fl. 33716
Fred Wick, FDEP, Tallahassee, w/attachment
Al Gephart, FDEP Tampa
Susan Pelz, P.E., FDEP Tampa

"More Protection, Less Process"

Printed on recycled paper.

File: 3-f
12/04

Fax

Name: Al gephart
Organization: F.D.E.P.
Fax: 813-744-6125
Phone: 813-744-6100 xt. 372
From: Richard Dillen
Date: December 8, 2003
Subject: Annual sampling of WWTS and OES
Pages: 1

Dear Al,

As mentioned in our telephone conversation today, HOWCO scheduled the annual sampling of Waste Water Treatment Sludge (WWTS) and Oil Extraction Sludge (OES) for Monday, December 15th, 2003 at 10:00 am.

The samples will be collected by Advanced Environmental Laboratories - Tampa.
Both samples and Equipment Blank will be analyzed for TCLP-Metals, TCLP-Volatiles, TCLP-Semi-Volatiles, TCLP-Pesticides and TCLP-Herbicides.

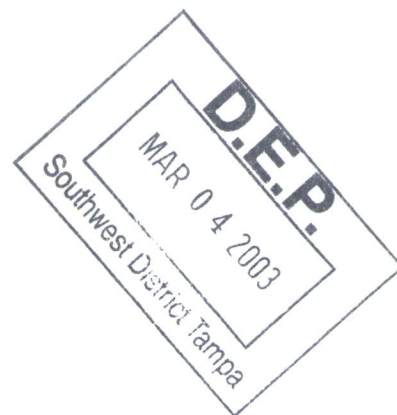
*File: 3-f
16/03*



March 3, 2003

Mr. Albert F. Gephart
Florida Dept. of Environmental Protection
Southwest District
3804 Coconut Palm Drive
Tampa, FL 33619

Re: HOWCO Environmental Services FLD 152 764 767
Amended Report



Dear Al,

Please find attached a copy of the amended Report, regarding the annual analysis of O.E.S. and W.W.T.S.

If you need any further information, please do not hesitate to call me at tel. 727-328-7403 xt 347.

Sincerely,

A handwritten signature in blue ink, appearing to read 'R. Dillen'.

Richard Dillen
Quality Assurance Officer

cc: File

FILE: 3-f
15/03



**Advanced
Environmental Laboratories, Inc.**

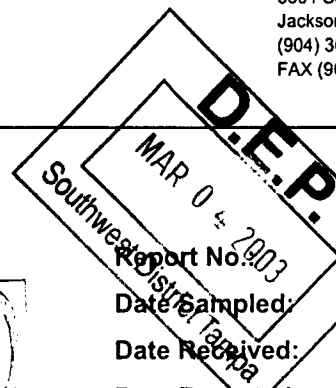
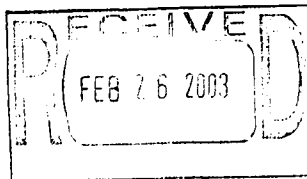
6601 Southpoint Parkway
Jacksonville, Florida 32216
(904) 363-9350
FAX (904) 363-9354

Client: Howco, Inc.
Project Name: Annual Compliance
Project Number:

Attention: Richard Dillen
Phone Number: 727-328-7403

Address: 3701 Central Ave.

St. Petersburg, FL 33713



Report No.: T0210209
Date Sampled: 12/27/2002
Date Received: 12/27/02 10:30
Date Reported: 1/29/03
Date Amended: 02/19/2003

AMENDED REPORT

Project Description

The analytical results for the samples contained in this report were submitted for analysis as outlined by the Chain of Custody.

Project Name: Annual Compliance

Approved By:

Michael Cammarata, Laboratory Manager

If you have any questions, the above named should be contacted.

Advanced Environmental Laboratories certifies that the test results in this report meet all requirements of the NELAC standards, unless noted otherwise in the body of the report.

Total Number of Pages =

Advanced Environmental Laboratories, Inc.

Analytical Report

Client: Howco, Inc.

Report No.: T0210209

Project Name: Annual Compliance

Date/Time Received: 12/27/02 10:30

Lab Code: T0210209-01

Date/Time Sampled: 12/27/2002 09:25

Client Sample ID: OES Tank 110

Site:

Sampled By: James Jones

Matrix: Soils/Solids

Shipping Method: AEL Pick-up

TCLP Acid Extractable Organics

Analytes:	Dilution	MDL	Adjusted Reporting Limit	Results	Units	Qualifier(s)	Method	Parameter Comment	Lab
TCLP 2,4,5-Trichlorophenol	10	0.0035	0.035	0.035	480 mg/L	U	8270		J
TCLP 2,4,6-Trichlorophenol	10	0.0022	0.022	0.022	210 mg/L	U	8270		J
TCLP m&p cresol	10	0.0062	0.062	0.062	200 mg/L	U	8270		J
TCLP o-Cresol	10	0.0023	0.023	0.023	200 mg/L	U	8270		J
TCLP Pentachlorophenol	10	0.00025	0.0025	0.0025	110 mg/L	U	8270		J

TCLP Base Neutral Organics

Analytes:	Dilution	MDL	Adjusted Reporting Limit	Results	Units	Qualifier(s)	Method	Parameter Comment	Lab
TCLP 1,4-Dichlorobenzene	10	0.0029	0.029	0.029	75 mg/L	U	8270		J
TCLP 2,4-Dinitrotoluene	10	0.00094	0.0094	0.0094	0.13 mg/L	U	8270	AIC	J
TCLP Hexachloro-1,3-butadiene	10	0.0021	0.021	0.021	0.5 mg/L	U	8270		J
TCLP Hexachlorobenzene	10	0.0018	0.018	0.018	0.13 mg/L	U	8270		J
TCLP Hexachloroethane	10	0.0028	0.028	0.028	3.0 mg/L	U	8270		J
TCLP Nitrobenzene	10	0.0010	0.010	0.010	2.0 mg/L	U	8270		J
TCLP Pyridine	10	0.0018	0.018	0.018	5.0 mg/L	U	8270		J

TCLP Herbicides

Analytes:	Dilution	MDL	Adjusted Reporting Limit	Results	Units	Qualifier(s)	Method	Parameter Comment	Lab
TCLP 2,4,5-TP (Silvex)	1	0.0020	0.0020	0.0020	1.0 mg/L	U	8151		ED
TCLP 2,4-D	1	0.0020	0.0020	0.0020	10.0 mg/L	U	8151		ED

TCLP Metals

Analytes:	Dilution	MDL	Adjusted Reporting Limit	Results	Units	Qualifier(s)	Method	Parameter Comment	Lab
TCLP Arsenic	1	0.20	0.20	0.20	5 mg/L	U	6010		J
TCLP Barium	1	2.5	2.5	2.5	100 mg/L	U	6010		J
TCLP Cadmium	1	0.050	0.050	0.050	1.0 mg/L	U	6010		J
TCLP Chromium	1	0.10	0.10	0.10	5.0 mg/L	U	6010		J
TCLP Lead	1	0.10	0.10	0.10	5.0 mg/L	U	6010		J
TCLP Selenium	1	0.20	0.20	0.20	1.0 mg/L	U	6010		J
TCLP Silver	1	0.10	0.10	0.10	5.0 mg/L	U	6010		J

TCLP Metals (Hg)

Analytes:	Dilution	MDL	Adjusted Reporting Limit	Results	Units	Qualifier(s)	Method	Parameter Comment	Lab
TCLP Mercury	1	0.010	0.010	0.010	0.2 mg/L	U	7470		J

Advanced Environmental Laboratories, Inc.

Analytical Report

Client: Howco, Inc.

Report No.: T0210209

Project Name: Annual Compliance

Date/Time Received: 12/27/02 10:30

TCLP Pesticides

Analytes:	Dilution	MDL	Adjusted Reporting Limit	Results ^{LIMIT}	Units	Qualifier(s)	Method	Parameter Comment	Lab
TCLP Chlordane	10	0.00013	0.0013	0.0013 0.03	mg/L	U	8081		J
TCLP Endrin	10	0.000005	0.000050	0.000050 0.2	mg/L	U	8081		J
TCLP Heptachlor	10	0.000063	0.00063	0.00063 0.08	mg/L	U	8081		J
TCLP Heptachlor Epoxide	10	0.000002	0.000020	0.000020 0.08	mg/L	U	8081		J
TCLP Lindane	10	0.000020	0.00020	0.00020 0.4	mg/L	U	8081		J
TCLP Methoxychlor	10	0.000003	0.000030	0.000030 10.0	mg/L	U	8081		J
TCLP Toxaphene	10	0.00052	0.0052	0.0052 0.5	mg/L	U	8081		J

TCLP Volatiles

Analytes:	Dilution	MDL	Adjusted Reporting Limit	Results ^{LIMIT}	Units	Qualifier(s)	Method	Parameter Comment	Lab
1,1-Dichloroethene	10	0.0010	0.010	0.10 0.7	mg/L	U	8260		J
1,2-Dichloroethane	10	0.0010	0.010	0.10 0.5	mg/L	U	8260		J
Benzene	10	0.0010	0.010	0.10 0.5	mg/L	U	8260		J
Carbon Tetrachloride	10	0.0010	0.010	0.10 0.5	mg/L	U	8260		J
Chlorobenzene	10	0.0010	0.010	0.10 100	mg/L	U	8260		J
Chloroform	10	0.0010	0.010	0.10 6	mg/L	U	8260		J
Methyl ethyl ketone	10	0.0050	0.050	0.50 200	mg/L	U	8260		J
Tetrachloroethene	10	0.0010	0.010	0.10 0.7	mg/L	U	8260		J
Trichloroethene	10	0.0010	0.010	0.10 0.5	mg/L	U	8260		J
Vinyl Chloride	10	0.0010	0.010	0.10 0.2	mg/L	U	8260		J

Surrogates:	Control Limits	% Recovery	Qual.	Method	Analysis Date	Prep Method	Prep Date	Analysis
Decachlorobiphenyl	30 - 120	0		8081	01/06/2003	3W1311/SW3510C	01/02/2003 10:00	ZP
Tetrachloro-m-xylene	30 - 120	0		8081	01/06/2003	3W1311/SW3510C	01/02/2003 10:00	ZP
1,2-Dichloroethane-d4	80 - 120	0		8260	12/31/2002	3W1311/SW5030E	12/31/2002 16:58	JA
4-Bromofluorobenzene	86 - 115	0		8260	12/31/2002	3W1311/SW5030E	12/31/2002 16:58	JA
Toluene d(8)	88 - 110	0		8260	12/31/2002	3W1311/SW5030E	12/31/2002 16:58	JA
2,4,6-Tribromophenol	15 - 112	0		8270	01/06/2003		01/03/2003 09:15	ZP
2-Fluorobiphenyl	20 - 119	0		8270	01/06/2003		01/03/2003 09:15	ZP
2-Fluorophenol	20 - 119	0		8270	01/06/2003		01/03/2003 09:15	ZP
Nitrobenzene d5	23 - 120	0		8270	01/06/2003		01/03/2003 09:15	ZP
p-Terphenyl-d14	18 - 137	0		8270	01/06/2003		01/03/2003 09:15	ZP
Phenol-d6	18 - 121	0	J4	8270	01/06/2003		01/03/2003 09:15	ZP

A/C Alternate initial calibration criteria used (mean RSD <15%)

J4 The sample matrix interfered with the ability to make an accurate determination.

U The compound was analyzed for but not detected.

J DOH certification #E82574 (AEL-JAX) (FL NELAC certification)

ED DOH Certification #E86188 (Envirodyne)

Advanced Environmental Laboratories, Inc.

Analytical Report

Client: Howco, Inc.

Report No.: T0210209

Project Name: Annual Compliance

Date/Time Received: 12/27/02 10:30

Lab Code: T0210209-02

Date/Time Sampled: 12/27/2002 08:10

Client Sample ID: WWTS

Site:

Sampled By: James Jones

Matrix: Soils/Solids

Shipping Method: AEL Pick-up

TCLP Herbicides

Analytes:	Dilution	MDL	Adjusted Reporting Limit	Results	Units	Qualifier(s)	Method	Parameter Comment	Lab
TCLP 2,4,5-TP (Silvex)	1	0.0020	0.0020	0.0020 ✓	mg/L	U	8151		ED
TCLP 2,4-D	1	0.0020	0.0020	0.0020 ✓	mg/L	U	8151		ED

TCLP Metals

Analytes:	Dilution	MDL	Adjusted Reporting Limit	Results	Units	Qualifier(s)	Method	Parameter Comment	Lab
TCLP Arsenic	1	0.20	0.20	0.20 ✓	mg/L	U	6010		J
TCLP Barium	1	2.5	2.5	2.5 ✓	mg/L	U	6010		J
TCLP Cadmium	1	0.050	0.050	0.050 ✓	mg/L	U	6010		J
TCLP Chromium	1	0.10	0.10	0.10 ✓	mg/L	U	6010		J
TCLP Lead	1	0.10	0.10	0.10 ✓	mg/L	U	6010		J
TCLP Selenium	1	0.20	0.20	0.20 ✓	mg/L	U	6010		J
TCLP Silver	1	0.10	0.10	0.10 ✓	mg/L	U	6010		J

TCLP Metals (Hg)

Analytes:	Dilution	MDL	Adjusted Reporting Limit	Results	Units	Qualifier(s)	Method	Parameter Comment	Lab
TCLP Mercury	1	0.010	0.010	0.010 ✓	mg/L	U	7470		J

TCLP Pesticides

Analytes:	Dilution	MDL	Adjusted Reporting Limit	Results	Units	Qualifier(s)	Method	Parameter Comment	Lab
TCLP Chlordane	10	0.00013	0.0013	0.0013 ✓	mg/L	U	8081		J
TCLP Endrin	10	0.000005	0.000050	0.000050 ✓	mg/L	U	8081		J
TCLP Heptachlor	10	0.000063	0.00063	0.00063 ✓	mg/L	U	8081		J
TCLP Heptachlor Epoxide	10	0.000002	0.000020	0.000020 ✓	mg/L	U	8081		J
TCLP Lindane	10	0.000020	0.00020	0.00020 ✓	mg/L	U	8081		J
TCLP Methoxychlor	10	0.00052	0.0052	0.0052 ✓	mg/L	U	8081		J
TCLP Toxaphene	10	0.00052	0.0052	0.0052 ✓	mg/L	U	8081		J

TCLP Semi-Volatile Organic Compounds

Analytes:	Dilution	MDL	Adjusted Reporting Limit	Results	Units	Qualifier(s)	Method	Parameter Comment	Lab
1,4-Dichlorobenzene	10	0.0029	0.029	0.029 ✓	mg/L	U	SW8270C		J
2,4,5-Trichlorophenol	10	0.0035	0.035	0.035 ✓	mg/L	U, J4	SW8270C		J
2,4,6-Trichlorophenol	10	0.0022	0.022	0.022 ✓	mg/L	U	SW8270C		J
2,4-Dinitrotoluene	10	0.00094	0.0094	0.0094 ✓	mg/L	U	SW8270C	AIC	J
2-Methylphenol	10	0.0023	0.023	0.023 ✓	mg/L	U	SW8270C		J
Hexachlorobenzene	10	0.0018	0.018	0.018 ✓	mg/L	U	SW8270C		J
Hexachlorobutadiene	10	0.0021	0.021	0.021 ✓	mg/L	U	SW8270C		J

Advanced Environmental Laboratories, Inc.

Analytical Report

Client: Howco, Inc.

Report No.: T0210209

Project Name: Annual Compliance

Date/Time Received: 12/27/02 10:30

Hexachloroethane	10	0.0028	0.028	0.028 ✓	mg/L	U	SW8270C	J
Nitrobenzene	10	0.0010	0.010	0.010 ✓	mg/L	U	SW8270C	J
Pentachlorophenol	10	0.0032	0.032	0.032 ✓	mg/L	U, J4	SW8270C	J
Pyridine	10	0.0018	0.018	0.018 ✓	mg/L	U	SW8270C	J

TCLP Volatile Organics

Analytes:	Dilution	MDL	Adjusted Reporting Limit	Results	Units	Qualifier(s)	Method	Parameter Comment	Lab
1,1-Dichloroethene	10	0.0010	0.010	0.010 ✓	mg/L	U	8260		J
1,2-Dichloroethane	10	0.0010	0.010	0.010 ✓	mg/L	U	8260		J
Benzene	10	0.0010	0.010	0.27 ✓	mg/L		8260		J
Carbon Tetrachloride	10	0.0010	0.010	0.010 ✓	mg/L	U	8260		J
Chlorobenzene	10	0.0010	0.010	0.010 ✓	mg/L	U	8260		J
Chloroform	10	0.0010	0.010	0.010 ✓	mg/L	U	8260		J
Methyl ethyl ketone	10	0.0050	0.050	0.026 ✓	mg/L		8260		J
Tetrachloroethene	10	0.0010	0.010	0.059 ✓	mg/L		8260		J
Trichloroethene	10	0.0010	0.010	0.010 ✓	mg/L	U	8260		J
Vinyl Chloride	10	0.0010	0.010	0.010 ✓	mg/L	U	8260		J

Surrogates:	Control Limits	% Recovery	Qual.	Method	Analysis Date	Prep Method	Prep Date	Analys
Decachlorobiphenyl	70 - 130	0		8081	01/06/2003			ZP
Decachlorobiphenyl	30 - 120	0		8081	01/06/2003			ZP
Tetrachloro-m-xylene	30 - 120	0		8081	01/06/2003			ZP
1,2-Dichloroethane-d4	80 - 120	0		8260	12/31/2002			JA
4-Bromofluorobenzene	86 - 115	0		8260	12/31/2002			JA
Toluene d(8)	88 - 110	0		8260	12/31/2002			JA
2,4,6-Tribromophenol	15 - 112	180		SW8270C	01/06/2003	SW1311/SW3510C		ZP
2-Fluorobiphenyl	20 - 119	76		SW8270C	01/06/2003	SW1311/SW3510C		ZP
2-Fluorophenol	20 - 119	52		SW8270C	01/06/2003	SW1311/SW3510C		ZP
Nitrobenzene d5	23 - 120	82		SW8270C	01/06/2003	SW1311/SW3510C		ZP
p-Terphenyl-d14	18 - 137	132		SW8270C	01/06/2003	SW1311/SW3510C		ZP
Phenol-d6	18 - 121	38		SW8270C	01/06/2003	SW1311/SW3510C		ZP

AIC Alternate initial calibration criteria used (mean RSD <15%)

J4 The sample matrix interfered with the ability to make an accurate determination.

U The compound was analyzed for but not detected.

J DOH certification #E82574 (AEL-JAX) (FL NELAC certification)

ED DOH Certification #E86188 (Envirodyne)

Advanced Environmental Laboratories, Inc.

Analytical Report

Client: Howco, Inc.

Report No.: T0210209

Project Name: Annual Compliance

Date/Time Received: 12/27/02 10:30

Lab Code: T0210209-03

Date/Time Sampled: 12/27/2002 08:45

Client Sample ID: EQ Blank

Site:

Sampled By: James Jones

Matrix: Ground Water

Shipping Method: AEL Pick-up

Base-Neutral/Acid Extractable Organic Compounds

Analytes:	Dilution	MDL	Adjusted Reporting Limit	Results	Units	Qualifier(s)	Method	Parameter Comment	Lab
1,2,4,5-Tetrachlorobenzene	10	10	100	100	µg/L	U	8270		J
1,2,4-Trichlorobenzene	10	10	100	100	µg/L	U	8270		J
1,2-Dichlorobenzene	10	10	100	100	µg/L	U	8270		J
1,2-Diphenylhydrazine	10	10	100	100	µg/L	U	8270		J
1,3-Dichlorobenzene	10	10	100	100	µg/L	U	8270		J
1,4-Dichlorobenzene	10	10	100	100	µg/L	U	8270		J
1-Methylnaphthalene	10	10	100	100	µg/L	U	8270		J
1-Naphthylamine	10	10	100	100	µg/L	U	8270		J
2,3,4,6-Tetrachlorophenol	10	10	100	100	µg/L	U	8270		J
2,4,5-Trichlorophenol	10	10	100	100	µg/L	U	8270		J
2,4,6-Trichlorophenol	10	10	100	100	µg/L	U	8270		J
2,4-Dichlorophenol	10	10	100	100	µg/L	U	8270		J
2,4-Dimethylphenol	10	10	100	100	µg/L	U	8270		J
2,4-Dinitrophenol	10	10	100	100	µg/L	U	8270	AIC	J
2,4-Dinitrotoluene	10	10	100	100	µg/L	U	8270	AIC	J
2,6-Dinitrotoluene	10	10	100	100	µg/L	U	8270	AIC	J
2-Chloronaphthalene	10	10	100	100	µg/L	U	8270		J
2-Chlorophenol	10	10	100	100	µg/L	U	8270		J
2-Methylnaphthalene	10	10	100	100	µg/L	U	8270		J
2-Methylphenol (o-Cresol)	10	10	100	100	µg/L	U	8270		J
2-Naphthylamine	10	10	100	100	µg/L	U	8270		J
2-Nitroaniline	10	10	100	100	µg/L	U	8270	AIC	J
2-Nitrophenol	10	10	100	100	µg/L	U	8270		J
2-Picoline	10	10	100	100	µg/L	U	8270		J
3,3'-dichlorobenzidine	10	10	100	100	µg/L	U	8270		J
3,4-Methylphenol(m&p-Cresol)	10	10	100	100	µg/L	U	8270		J
3-Methylcholanthrene	10	10	100	100	µg/L	U	8270		J
3-Nitroaniline	10	10	100	100	µg/L	U	8270	AIC	J
4,6-Dinitro-2-methylphenol	10	10	100	100	µg/L	U	8270	AIC	J
4-Aminobiphenyl	10	10	100	100	µg/L	U	8270		J
4-Bromophenyl phenyl ether	10	10	100	100	µg/L	U	8270		J
4-Chloro-3-methylphenol	10	10	100	100	µg/L	U	8270		J
4-Chloroaniline	10	10	100	100	µg/L	U	8270		J
4-Chlorophenyl Phenyl Ether	10	10	100	100	µg/L	U	8270		J
4-Nitroaniline	10	10	100	100	µg/L	U	8270		J
4-Nitrophenol	10	10	100	100	µg/L	U	8270	AIC	J

Advanced Environmental Laboratories, Inc.

Analytical Report

Client: Howco, Inc.

Report No.: T0210209

Project Name: Annual Compliance

Date/Time Received: 12/27/02 10:30

7,12-Dimethylbenz(a)anthracene	10	10	100	100	µg/L	U	8270	J
a,a-Dimethylphenethylamine	10	10	100	100	µg/L	U	8270	J
Acenaphthene	10	10	100	100	µg/L	U	8270	J
Acenaphthylene	10	10	100	100	µg/L	U	8270	J
Acetophenone	10	10	100	100	µg/L	U	8270	J
Aniline	10	10	100	100	µg/L	U	8270	J
Anthracene	10	10	100	100	µg/L	U	8270	J
Benzidine	10	10	100	100	µg/L	U	8270	J
Benzo(a)anthracene	10	10	100	100	µg/L	U	8270	J
Benzo(a)pyrene	10	10	100	100	µg/L	U	8270	J
Benzo(b)fluoranthene	10	10	100	100	µg/L	U	8270	J
Benzo(g,h,i)perylene	10	10	100	100	µg/L	U	8270	J
Benzo(k)fluoranthene	10	10	100	100	µg/L	U	8270	J
Benzoic Acid	10	10	100	100	µg/L	U	8270	J
Benzyl Alcohol	10	10	100	100	µg/L	U	8270	J
Benzyl Butyl Phthalate	10	10	100	100	µg/L	U	8270	J
Bis(2-chloroethoxy)methane	10	10	100	100	µg/L	U	8270	J
Bis(2-chloroethyl) Ether	10	10	100	100	µg/L	U	8270	J
Bis(2-chloroisopropyl) Ether	10	10	100	100	µg/L	U	8270	J
Bis(2-ethylhexyl) Phthalate	10	10	100	100	µg/L	U	8270	J
Chrysene	10	10	100	100	µg/L	U	8270	J
Di-n-butyl Phthalate	10	10	100	100	µg/L	U	8270	J
Di-n-octyl Phthalate	10	10	100	100	µg/L	U	8270	J
Dibenz(a,h)anthracene	10	10	100	100	µg/L	U	8270	J
Dibenzofuran	10	10	100	100	µg/L	U	8270	J
Diethyl Phthalate	10	10	100	100	µg/L	U	8270	J
Dimethyl Phthalate	10	10	100	100	µg/L	U	8270	J
Ethyl Methanesulfonate	10	10	100	100	µg/L	U	8270	J
Fluoranthene	10	10	100	100	µg/L	U	8270	J
Fluorene	10	10	100	100	µg/L	U	8270	J
Hexachlorobenzene	10	10	100	100	µg/L	U	8270	J
Hexachlorobutadiene	10	10	100	100	µg/L	U	8270	J
Hexachlorocyclopentadiene	10	10	100	100	µg/L	U	8270	J
Hexachloroethane	10	10	100	100	µg/L	U	8270	J
Indeno(1,2,3-cd)pyrene	10	10	100	100	µg/L	U	8270	J
Isophorone	10	10	100	100	µg/L	U	8270	J
Methyl Methanesulfonate	10	10	100	100	µg/L	U	8270	J
N-Nitroso-di-n-butylamine	10	10	100	100	µg/L	U	8270	J
N-Nitrosodi-n-propylamine	10	10	100	100	µg/L	U	8270	J
N-Nitrosodimethylamine	10	10	100	100	µg/L	U	8270	J
N-Nitrosodiphenylamine	10	10	100	100	µg/L	U	8270	J
N-Nitrosopiperidine	10	10	100	100	µg/L	U	8270	J
Naphthalene	10	10	100	100	µg/L	U	8270	J

Advanced Environmental Laboratories, Inc.

Analytical Report

Client: Howco, Inc.

Report No.: T0210209

Project Name: Annual Compliance

Date/Time Received: 12/27/02 10:30

Nitrobenzene	10	10	100	100	µg/L	U	8270		J
p-Dimethylaminoazobenzene	10	10	100	100	µg/L	U	8270	AIC	J
Pentachlorobenzene	10	10	100	100	µg/L	U	8270		J
Pentachloronitrobenzene	10	10	100	100	µg/L	U	8270	AIC	J
Pentachlorophenol	10	10	100	100	µg/L	U	8270		J
Phenacetin	10	10	100	100	µg/L	U	8270		J
Phenanthrene	10	10	100	100	µg/L	U	8270		J
Phenol	10	10	100	100	µg/L	U	8270		J
Pronamide	10	10	100	100	µg/L	U	8270	AIC	J
Pyrene	10	10	100	100	µg/L	U	8270		J

Chlorinated Pesticides

Analytes:	Dilution	MDL	Adjusted Reporting Limit	Results	Units	Qualifier(s)	Method	Parameter Comment	Lab
Aldrin	10	0.10	1.0	1.0	µg/L	U	8081		J
Alpha-BHC	10	0.10	1.0	1.0	µg/L	U	8081		J
Beta-BHC	10	0.10	1.0	1.0	µg/L	U	8081		J
Chlordane	10	1.0	10	10	µg/L	U	8081		J
Delta-BHC	10	0.10	1.0	1.0	µg/L	U	8081		J
Dieldrin	10	0.10	1.0	1.0	µg/L	U	8081		J
Endosulfan I	10	0.10	1.0	1.0	µg/L	U	8081		J
Endosulfan II	10	0.10	1.0	1.0	µg/L	U	8081		J
Endosulfan Sulfate	10	0.10	1.0	1.0	µg/L	U	8081		J
Endrin	10	0.10	1.0	1.0	µg/L	U	8081		J
Endrin Aldehyde	10	0.10	1.0	1.0	µg/L	U	8081		J
Gamma-BHC (Lindane)	10	0.10	1.0	1.0	µg/L	U	8081		J
Heptachlor	10	0.10	1.0	1.0	µg/L	U	8081		J
Heptachlor Epoxide	10	0.10	1.0	1.0	µg/L	U	8081		J
Methoxychlor	10	0.10	1.0	1.0	µg/L	U	8081		J
Toxaphene	10	1.0	10	10	µg/L	U	8081		J

Herbicides

Analytes:	Dilution	MDL	Adjusted Reporting Limit	Results	Units	Qualifier(s)	Method	Parameter Comment	Lab
2,4,5-T	1	1.0	1.0	1.0	µg/L	U	8151		ED
2,4,5-TP (Silvex)	1	1.0	1.0	1.0	µg/L	U	8151		ED
2,4-D	1	1.0	1.0	1.0	µg/L	U	8151		ED
2,4-DB	1	1.0	1.0	1.0	µg/L	U	8151		ED
4-Nitrophenol	1	1.0	1.0	1.0	µg/L	U	8151		ED
Dalapon	1	1.0	1.0	1.0	µg/L	U	8151		ED
Dicamba	1	1.0	1.0	1.0	µg/L	U	8151		ED
Dichlorprop	1	1.0	1.0	1.0	µg/L	U	8151		ED
Dinoseb	1	1.0	1.0	1.0	µg/L	U	8151		ED
MCPA	1	50	50	50	µg/L	U	8151		ED
MCPP	1	50	50	50	µg/L	U	8151		ED

Advanced Environmental Laboratories, Inc.

Analytical Report

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Report No.: T0210209

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Date/Time Received: 12/27/02 10:30

Pentachlorophenol	1	1.0	1.0	1.0	µg/L	U	8151	ED
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Total Metals

Analytes:	Dilution	MDL	Adjusted Reporting Limit	Results	Units	Qualifier(s)	Method	Parameter Comment	Lab
Arsenic	1	0.010	0.010	0.010	mg/L	U	6010		J
Barium	1	0.010	0.010	0.010	mg/L	U	6010		J
Cadmium	1	0.0050	0.0050	0.0050	mg/L	U	6010		J
Chromium	1	0.010	0.010	0.010	mg/L	U	6010		J
Lead	1	0.010	0.010	0.010	mg/L	U	6010		J
Selenium	1	0.020	0.020	0.020	mg/L	U	6010		J
Silver	1	0.010	0.010	0.010	mg/L	U	6010		J

Total Metals (Hg)

Analytes:	Dilution	MDL	Adjusted Reporting Limit	Results	Units	Qualifier(s)	Method	Parameter Comment	Lab
Mercury	1	0.00020	0.00020	0.00020	mg/L	U	7470		J

Volatile Organic Hydrocarbons

Analytes:	Dilution	MDL	Adjusted Reporting Limit	Results	Units	Qualifier(s)	Method	Parameter Comment	Lab
1,1,1-Trichloroethane	10	1.0	10	1.0	µg/L	U	8260		J
1,1,2,2-Tetrachloroethane	10	1.0	10	1.0	µg/L	U	8260		J
1,1,2-Trichloroethane	10	1.0	10	1.0	µg/L	U	8260		J
1,1-Dichloroethane	10	1.0	10	1.0	µg/L	U	8260		J
1,1-Dichloroethene	10	1.0	10	1.0	µg/L	U	8260		J
1,2-Dichlorobenzene	10	1.0	10	1.0	µg/L	U	8260		J
1,2-Dichloroethane	10	1.0	10	1.0	µg/L	U	8260		J
1,2-Dichloropropane	10	1.0	10	1.0	µg/L	U	8260		J
1,3-Dichlorobenzene	10	1.0	10	1.0	µg/L	U	8260		J
1,4-Dichlorobenzene	10	1.0	10	1.0	µg/L	U	8260		J
2-Chloroethyl Vinyl Ether	10	10	100	10	µg/L	U	8260	AIC	J
Benzene	10	1.0	10	1.0	µg/L	U	8260		J
Bromodichloromethane	10	1.0	10	1.0	µg/L	U	8260		J
Bromoform	10	1.0	10	1.0	µg/L	U	8260		J
Bromomethane	10	1.0	10	1.0	µg/L	U	8260		J
Carbon Tetrachloride	10	1.0	10	1.0	µg/L	U	8260		J
Chlorobenzene	10	1.0	10	1.3	µg/L		8260		J
Chloroethane	10	1.0	10	1.0	µg/L	U	8260		J
Chloroform	10	1.0	10	1.0	µg/L	U	8260		J
Chloromethane	10	1.0	10	1.0	µg/L	U	8260		J
Cis-1,2-dichloroethene	10	1.0	10	1.0	µg/L	U	8260		J
Cis-1,3-dichloropropene	10	1.0	10	1.0	µg/L	U	8260		J
Dibromochloromethane	10	1.0	10	1.0	µg/L	U	8260		J
Dichlorodifluoromethane	10	1.0	10	1.0	µg/L	U	8260		J
Ethylbenzene	10	1.0	10	1.0	µg/L	U	8260		J

Advanced Environmental Laboratories, Inc.

Analytical Report

Client: Howco, Inc.

Report No.: T0210209

Project Name: Annual Compliance

Date/Time Received: 12/27/02 10:30

m&p-Xylenes	10	1.0	10	1.0	µg/L	U	8260	J
Methyl-tert-butyl Ether	10	1.0	10	1.0	µg/L	U	8260	J
Methylene Chloride	10	5.0	50	5.0	µg/L	U	8260	J
o-Xylene	10	1.0	10	1.0	µg/L	U	8260	J
Tetrachloroethene	10	1.0	10	1.0	µg/L	U	8260	J
Toluene	10	1.0	10	1.0	µg/L	U	8260	J
Trans-1,2-dichloroethene	10	1.0	10	1.0	µg/L	U	8260	J
Trans-1,3-dichloropropene	10	1.0	10	1.0	µg/L	U	8260	J
Trichloroethene	10	1.0	10	1.0	µg/L	U	8260	J
Trichlorofluoromethane	10	1.0	10	1.0	µg/L	U	8260	J
Vinyl Chloride	10	1.0	10	1.0	µg/L	U	8260	J

Surrogates:	Control Limits	% Recovery	Qual.	Method	Analysis Date	Prep Method	Prep Date	Analys
Decachlorobiphenyl	30 - 120	0		8081	01/06/2003		01/02/2003 10:00	ZP
Tetrachloro-m-xylene	30 - 120	0		8081	01/06/2003		01/02/2003 10:00	ZP
1,2-Dichloroethane-d4	80 - 120	0		8260	12/31/2002			JA
4-Bromofluorobenzene	86 - 115	0		8260	12/31/2002			JA
Toluene d(8)	88 - 110	0		8260	12/31/2002			JA
2,4,6-Tribromophenol	15 - 112	0		8270	01/06/2003		01/03/2003 09:15	ZP
2-Fluorobiphenyl	20 - 119	0		8270	01/06/2003		01/03/2003 09:15	ZP
2-Fluorophenol	20 - 119	0		8270	01/06/2003		01/03/2003 09:15	ZP
Nitrobenzene d5	23 - 120	0		8270	01/06/2003		01/03/2003 09:15	ZP
p-Terphenyl-d14	18 - 137	0		8270	01/06/2003		01/03/2003 09:15	ZP
Phenol-d6	18 - 121	0		8270	01/06/2003		01/03/2003 09:15	ZP

AIC Alternate initial calibration criteria used (mean RSD <15%)

U The compound was analyzed for but not detected.

J DOH certification #E82574 (AEL-JAX) (FL NELAC certification)

ED DOH Certification #E86188 (Envirodyne)

Advanced Environmental Laboratories, Inc.

Analytical Report

Client: Howco, Inc.

Report No.: T0210209

Project Name: Annual Compliance

Date/Time Received: 12/27/02 10:30

Sample Cross Reference Information

Lab Code: T0210209-01

Site:

Client Sample Number: OES Tank 110

Matrix: Soils/Solids

Test Description	Analysis Method	Prep Method	Analytical Batch ID	Analysis Date/Time	Analyst	Prep Batch ID	Prep Date/Time
TCLP Acid Extractable Organics	8270	NONE	sv010603I	01/06/2003 21:52	ZP	SV010303-BNA	01/03/2003 09:15
TCLP Base Neutral Organics	8270	NONE	sv010603I	01/06/2003 21:52	ZP	SV010303-BNA	01/03/2003 09:15
TCLP Herbicides	8151	SW1311/SW3510C	wct010903herb	01/09/2003	MC	pb010703HERB	01/07/2003
TCLP Metals	6010	NONE	M010203-3010 #2	01/02/2003 17:32	DS	M010203-3010 #2	01/02/2003 09:44
TCLP Metals (Hg)	7470	NONE	M010302-HG #3	01/03/2003 10:42	TP	M010303-HG #3A	01/03/2003 05:00
TCLP Pesticides	8081	SW1311/SW3510C	sv010603f	01/06/2003 20:03	ZP	SV010203-PEST	01/02/2003 10:00
TCLP Volatiles	8260	SW1311/SW5030B	V123102A	12/31/2002 16:58	JA		

Lab Code: T0210209-02

Site:

Client Sample Number: WWTs

Matrix: Soils/Solids

Test Description	Analysis Method	Prep Method	Analytical Batch ID	Analysis Date/Time	Analyst	Prep Batch ID	Prep Date/Time
TCLP Herbicides	8151	NONE	wct010903herb	01/09/2003	MC	PBWCT010703HERB	01/07/2003
TCLP Metals	6010	NONE	M010203-3010 #2	01/02/2003 17:32	DS	M010203-3010 #2	01/02/2003 09:44
TCLP Metals (Hg)	7470	NONE	M010302-HG #3	01/03/2003 10:42	TP	M010303-HG #3A	01/03/2003 05:00
TCLP Pesticides	8081	NONE	sv010603f	01/06/2003 20:03	ZP		
TCLP Semi-Volatile Organic Compounds	SW8270C	SW1311/SW3510C	sv010603I	01/06/2003 21:52	ZP		
TCLP Volatile Organics	8260	NONE	V123102A	12/31/2002 16:58	JA		

Lab Code: T0210209-03

Site:

Client Sample Number: EQ Blank

Matrix: Ground Water

Test Description	Analysis Method	Prep Method	Analytical Batch ID	Analysis Date/Time	Analyst	Prep Batch ID	Prep Date/Time
Base-Neutral/Acid Extractable Organic Comp	8270	NONE	sv010603I	01/06/2003 21:52	ZP	SV010303-BNA	01/03/2003 09:15
Chlorinated Pesticides	8081	NONE	sv010603f	01/06/2003 20:03	ZP	SV010203-PEST	01/02/2003 10:00
Herbicides	8151	NONE	wct010903herb	01/09/2003	MC		
Total Metals	6010	NONE	M123102-3010 #1	12/31/2002 11:30	DS	M123102-3010 #1	12/31/2002 07:30
Total Metals (Hg)	7470	NONE	M010302-HG #1	01/03/2003 08:56	TP	M010303-HG #1A	01/03/2003 05:00
Volatile Organic Hydrocarbons	8260	NONE	V123102A	12/31/2002 16:58	JA		

Definitions:

Water matrix refers to all aqueous matrices, including but not limited to, drinking water, wastewater, ground water, surface water, aqueous wastes and leachates

Soil matrix refers to all non-aqueous matrices, including soils, solids, sludges, semi-solids, and non-aqueous waste sample:

All results in mg/kg or % are reported in dry weight basis, unless notated otherwise. All results in mg/L are reported in wet weight basis.

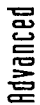
MDL Method Detection Limit, without correction for dilution or moisture content

Adjusted Reporting Limit is the MDL accounting for all dilutions and moisture content calculations.

PQL is defined to be 4 times the MDL, for all results qualified with an 'I' qualifier

The estimated measurements of uncertainty can be provided upon request

This is the last page of the analytical report.



CHAIN OF CUSTODY RECORD

LAB NUMBER: T0210209

Page 1 of 1

Environmental Laboratories, Inc.

↓ Jacksonville: 6601 Southpoint Parkway, Jacksonville, FL 32216 • (904) 363-9350 Fax (904) 363-9354

Tampa: 5810-D Breckenridge Parkway, Tampa, FL 33610 • (813) 630-9616 Fax (813) 630-4327

J Gainesville: 2106 NW 67th Place, Suite 7, Gainesville, FL 32606 • (352) 367-1500 Fax (352) 367-0050

[illegible]

I = Ice	H = (HCl)	S = (H ₂ SO ₄)	N = (HNO ₃)	T = (Sodium Thiosulfate)
---------	-----------	---------------------------------------	-------------------------	--------------------------

Shipment		Method	Sample Kit	Cooler #	1	2	3	4
Out: / /	Via:	RB	D/T		12/27 9:00	12/27	9/16	
Ret: / /	Via:	AB	D/T		12/27 10:30	12.27.2	10.10	
		Trip Bl.	☐	☐				

Received on ice: ψ_{yes}	no	sent	received
Received on ice: ψ_{yes}			
no			

revised 8/01



David B. Struhs
Secretary

SUBJECT: Howco-

Telephone

FILE: 3-f

14/03

2-4-03

Howco

DAVE THOMPSON
TINA CHRISTENSEN
Richard D. Hill
Tom Hagan

Parts Washer Solvent

Howco: Want to pick up customer parts washer solvents but do not want to test every load back to the facility to put in used oil process.

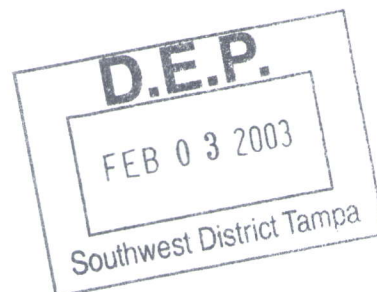
FDEP: Due to variability of customers & usage - have to test every load or fall under an exemption such as distill and give back to customer not putting into U.O. process



AG
BK
ST

January 29, 2003

Solid Waste Section Manager *2/4/03*
c/o Mrs. Susan J. Pelz
Florida Dept. of Environmental Protection
Southwest District
3804 Coconut Palm Drive
Tampa, FL 33619



Re: HOWCO Environmental Services
92465-HO06-001
Results of annual "OES" and "WWTS" testing

Dear Susan,

Please find enclosed a copy of the annual Solid Waste analyses on Oil Extraction Sludge (OES, Tank-110) and Waste Water Treatment Sludge (WWTS), per Specific Condition IV.4.c(6).

If you have any questions, please do not hesitate to contact me at 727-328-7403, ext. 347.

Sincerely,

Richard Dillen

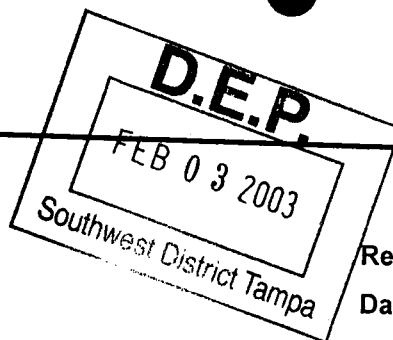
cc: File, w/attachment

*File: 3-f
13/03*



Advanced
Environmental Laboratories, Inc.

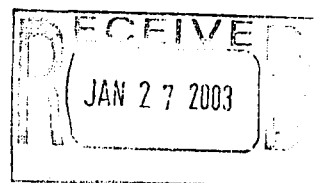
5810-D Breckenridge Parkway
Tampa, Florida 33610
(813) 630-9616
FAX (813) 630-4327



Client: Howco, Inc.
Project Name: Annual Compliance
Project Number:

Report No.: T0210209
Date Sampled: 12/27/02
Date Received: 12/27/02 10:30
Date Reported: 1/23/03

Attention: Richard Dillen
Phone Number: 727-328-7403
Address: 3701 Central Ave.
St. Petersburg, FL 33713



Project Description

The analytical results for the samples contained in this report were submitted for analysis as outlined by the Chain of Custody.

Project Name: Annual Compliance

Approved By:

Michael Cammarata, Laboratory Manager

If you have any questions, the above named should be contacted.

Advanced Environmental Laboratories certifies that the test results in this report meet all requirements of the NELAC standards, unless notated otherwise in the body of the report.

Total Number of Pages =

Advanced Environmental Laboratories, Inc.

Analytical Report

Client: Howco, Inc.
 Project Name: Annual Compliance
 Matrix: Soils/Solids

Report No.: T0210209
 Date/Time Sampled: 12/27/02 9:25
 Date/Time Received: 12/27/02 10:30

Lab Code: T0210209-01
 Client Sample ID: OES Tank 110

Sampled By: James Jones
 Shipping Method: AEL Pick-up

TCLP Acid Extractable Organics

Analytes:	Lab	Dilution	MRL	Results	Units	Qualifier	Analysis Method	Analysis Date/Time	Prep Method	Prep Date/Time	Analyst
TCLP 2,4,5-Trichlorophenol	J	10	2.5	2.5	mg/L	U	8270	1/6/03	21:52 V1311/SW3511	1/3/03 9:15	ZP
TCLP 2,4,6-Trichlorophenol	J	10	2.5	2.5	mg/L	U	8270	1/6/03	21:52 V1311/SW3511	1/3/03 9:15	ZP
TCLP m&p cresol	J	10	2.5	2.5	mg/L	U	8270	1/6/03	21:52 V1311/SW3511	1/3/03 9:15	ZP
TCLP o-Cresol	J	10	2.5	2.5	mg/L	U	8270	1/6/03	21:52 V1311/SW3511	1/3/03 9:15	ZP
TCLP Pentachlorophenol	J	10	2.5	2.5	mg/L	U	8270	1/6/03	21:52 V1311/SW3511	1/3/03 9:15	ZP

TCLP Base Neutral Organics

Analytes:	Lab	Dilution	MRL	Results	Units	Qualifier	Analysis Method	Analysis Date/Time	Prep Method	Prep Date/Time	Analyst
TCLP 1,4-Dichlorobenzene	J	10	1.0	1.0	mg/L	U	8270	1/6/03	21:52 V1311/SW3511	1/3/03 9:15	ZP
TCLP 2,4-Dinitrotoluene	J	10	1.0	1.0	mg/L	U	8270	1/6/03	21:52 V1311/SW3511	1/3/03 9:15	ZP
TCLP Hexachloro-1,3-butadien	J	10	1.0	1.0	mg/L	U	8270	1/6/03	21:52 V1311/SW3511	1/3/03 9:15	ZP
TCLP Hexachlorobenzene	J	10	1.0	1.0	mg/L	U	8270	1/6/03	21:52 V1311/SW3511	1/3/03 9:15	ZP
TCLP Hexachloroethane	J	10	1.0	1.0	mg/L	U	8270	1/6/03	21:52 V1311/SW3511	1/3/03 9:15	ZP
TCLP Nitrobenzene	J	10	1.0	1.0	mg/L	U	8270	1/6/03	21:52 V1311/SW3511	1/3/03 9:15	ZP
TCLP Pyridine	J	10	1.0	1.0	mg/L	U	8270	1/6/03	21:52 V1311/SW3511	1/3/03 9:15	ZP

TCLP Herbicides

Analytes:	Lab	Dilution	MRL	Results	Units	Qualifier	Analysis Method	Analysis Date/Time	Prep Method	Prep Date/Time	Analyst
TCLP 2,4,5-TP (Silvex)	ED	1	0.0020	0.0020	mg/L	U	8151	1/9/03	V1311/SW3511		MC
TCLP 2,4-D	ED	1	0.0020	0.0020	mg/L	U	8151	1/9/03	V1311/SW3511		MC

TCLP Metals

Analytes:	Lab	Dilution	MRL	Results	Units	Qualifier	Analysis Method	Analysis Date/Time	Prep Method	Prep Date/Time	Analyst
TCLP Arsenic	J	1	0.20	0.20	mg/L	U	6010	1/2/03	17:32 V1311/SW3011	1/2/03 9:44	DS
TCLP Barium	J	1	2.5	2.5	mg/L	U	6010	1/2/03	17:32 V1311/SW3011	1/2/03 9:44	DS
TCLP Cadmium	J	1	0.050	0.050	mg/L	U	6010	1/2/03	17:32 V1311/SW3011	1/2/03 9:44	DS
TCLP Chromium	J	1	0.10	0.10	mg/L	U	6010	1/2/03	17:32 V1311/SW3011	1/2/03 9:44	DS
TCLP Lead	J	1	0.10	0.10	mg/L	U	6010	1/2/03	17:32 V1311/SW3011	1/2/03 9:44	DS
TCLP Mercury	J	1	0.010	0.010	mg/L	U	6010	1/2/03	17:32 V1311/SW3011	1/2/03 9:44	DS
TCLP Selenium	J	1	0.20	0.20	mg/L	U	7470	1/3/03	10:42	1/3/03 5:00	TP
TCLP Silver	J	1	0.10	0.10	mg/L	U	6010	1/2/03	17:32 V1311/SW3011	1/2/03 9:44	DS

TCLP Pesticides

Analytes:	Lab	Dilution	MRL	Results	Units	Qualifier	Analysis Method	Analysis Date/Time	Prep Method	Prep Date/Time	Analyst
TCLP Chlordane	J	10		0.010	mg/L	U	8081	1/6/03	20:03 V1311/SW3511	1/2/03 10:00	ZP
TCLP Endrin	J	10		0.050	mg/L	U	8081	1/6/03	20:03 V1311/SW3511	1/2/03 10:00	ZP
TCLP Heptachlor	J	10		0.040	mg/L	U	8081	1/6/03	20:03 V1311/SW3511	1/2/03 10:00	ZP
TCLP Heptachlor Epoxide	J	10		0.040	mg/L	U	8081	1/6/03	20:03 V1311/SW3511	1/2/03 10:00	ZP
TCLP Lindane	J	10		0.050	mg/L	U	8081	1/6/03	20:03 V1311/SW3511	1/2/03 10:00	ZP
TCLP Methoxychlor	J	10		0.20	mg/L	U	8081	1/6/03	20:03 V1311/SW3511	1/2/03 10:00	ZP
TCLP Toxaphene	J	10		0.10	mg/L	U	8081	1/6/03	20:03 V1311/SW3511	1/2/03 10:00	ZP

Advanced Environmental Laboratories, Inc.

Analytical Report

Client: Howco, Inc.
 Project Name: Annual Compliance
 Matrix: Soils/Solids

Report No.: T0210209
 Date/Time Sampled: 12/27/02 9:25
 Date/Time Received: 12/27/02 10:30

Lab Code: T0210209-01
 Client Sample ID: OES Tank 110

Sampled By: James Jones
 Shipping Method: AEL Pick-up

TCLP Volatiles

Analytes:	Lab	Dilution	MRL	Results	Units	Qualifier	Analysis Method	Analysis Date/Time	Prep Method	Prep Date/Time	Analyst
1,1-Dichloroethene	J	10	0.010	0.10	mg/L	U	8260	12/31/02 16:58	V1311/SW503i		JA
1,2-Dichloroethane	J	10	0.010	0.10	mg/L	U	8260	12/31/02 16:58	V1311/SW503i		JA
Benzene	J	10	0.010	0.10	mg/L	U	8260	12/31/02 16:58	V1311/SW503i		JA
Carbon Tetrachloride	J	10	0.010	0.10	mg/L	U	8260	12/31/02 16:58	V1311/SW503i		JA
Chlorobenzene	J	10	0.010	0.10	mg/L	U	8260	12/31/02 16:58	V1311/SW503i		JA
Chloroform	J	10	0.010	0.10	mg/L	U	8260	12/31/02 16:58	V1311/SW503i		JA
Methyl ethyl ketone	J	10	0.050	0.50	mg/L	U	8260	12/31/02 16:58	V1311/SW503i		JA
Tetrachloroethene	J	10	0.010	0.10	mg/L	U	8260	12/31/02 16:58	V1311/SW503i		JA
Trichloroethene	J	10	0.010	0.10	mg/L	U	8260	12/31/02 16:58	V1311/SW503i		JA
Vinyl Chloride	J	10	0.010	0.10	mg/L	U	8260	12/31/02 16:58	V1311/SW503i		JA

Surrogates:	Control Limits	Percent Recovery	Qual.	Method	Analysis Date	Prep Method	Prep Date	Analyst
Decachlorobiphenyl	30 - 120	78 %		8081	1/6/03	SW1311/SW3510C	1/2/03	ZP
Tetrachloro-m-xylene	30 - 120	51 %		8081	1/6/03	SW1311/SW3510C	1/2/03	ZP
1,2-Dichloroethane-d4	80 - 120	112 %		8260	12/31/02	SW1311/SW5030B		JA
4-Bromofluorobenzene	86 - 115	108 %		8260	12/31/02	SW1311/SW5030B		JA
Toluene d(8)	88 - 110	105 %		8260	12/31/02	SW1311/SW5030B		JA
2,4,6-Tribromophenol	15 - 112	57 %		8270	1/6/03	SW1311/SW3510C	1/3/03	ZP
2-Fluorobiphenyl	20 - 119	32 %		8270	1/6/03	SW1311/SW3510C	1/3/03	ZP
2-Fluorophenol	20 - 119	20 %		8270	1/6/03	SW1311/SW3510C	1/3/03	ZP
Nitrobenzene d5	23 - 120	35 %		8270	1/6/03	SW1311/SW3510C	1/3/03	ZP
p-Terphenyl-d14	18 - 137	58 %		8270	1/6/03	SW1311/SW3510C	1/3/03	ZP
Phenol-d6	18 - 121	14 %	J4	8270	1/6/03	SW1311/SW3510C	1/3/03	ZP

- AIC Alternate initial calibration criteria used (mean RSD <15%)
 J4 The sample matrix interfered with the ability to make an accurate determination.
 U The compound was analyzed for but not detected.
 All soil results are reported in dry weight basis
 MRL Method Reporting Limit
 ✓ DOH certification #E82574 (AEL-JAX) (FL NELAC certification)
 ED DOH Certification #E86188 (Envirodyne)

Advanced Environmental Laboratories, Inc.

Analytical Report

Client: Howco, Inc.
 Project Name: Annual Compliance
 Matrix: Soils/Solids

Report No.: T0210209
 Date/Time Sampled: 12/27/02 8:10
 Date/Time Received: 12/27/02 10:30

Lab Code: T0210209-02
 Client Sample ID: WWTS

Sampled By: James Jones
 Shipping Method: AEL Pick-up

TCLP Herbicides

Analytes:	Lab	Dilution	MRL	Results	Units	Qualifier	Analysis Method	Analysis Date/Time	Prep Method	Prep Date/Time	Analyst
TCLP 2,4,5-TP (Silvex)	ED	1	0.0020	0.0020	mg/L	U	8151	1/9/03		1/7/03 0:00	MC
TCLP 2,4-D	ED	1	0.0020	0.0020	mg/L	U	8151	1/9/03		1/7/03 0:00	MC

TCLP Metals

Analytes:	Lab	Dilution	MRL	Results	Units	Qualifier	Analysis Method	Analysis Date/Time	Prep Method	Prep Date/Time	Analyst
TCLP Arsenic	J	1	0.20	0.20	mg/L	U	6010	1/2/03	17:32 V1311/SW301	1/2/03 9:44	DS
TCLP Barium	J	1	2.5	2.5	mg/L	U	6010	1/2/03	17:32 V1311/SW301	1/2/03 9:44	DS
TCLP Cadmium	J	1	0.050	0.050	mg/L	U	6010	1/2/03	17:32 V1311/SW301	1/2/03 9:44	DS
TCLP Chromium	J	1	0.10	0.10	mg/L	U	6010	1/2/03	17:32 V1311/SW301	1/2/03 9:44	DS
TCLP Lead	J	1	0.10	0.10	mg/L	U	6010	1/2/03	17:32 V1311/SW301	1/2/03 9:44	DS
TCLP Mercury	J	1	0.010	0.010	mg/L	U	6010	1/2/03	17:32 V1311/SW301	1/2/03 9:44	DS
TCLP Selenium	J	1	0.20	0.20	mg/L	U	7470	1/3/03	10:42 V1311/SW747	1/3/03 5:00	TP
TCLP Silver	J	1	0.10	0.10	mg/L	U	6010	1/2/03	17:32 V1311/SW301	1/2/03 9:44	DS
							6010	1/2/03	17:32 V1311/SW301	1/2/03 9:44	DS

TCLP Pesticides

Analytes:	Lab	Dilution	MRL	Results	Units	Qualifier	Analysis Method	Analysis Date/Time	Prep Method	Prep Date/Time	Analyst
TCLP Chlordane	J	10	0.012	0.012	mg/L	U	8081	1/6/03	20:03 V1311/SW351		ZP
TCLP Endrin	J	10	0.0010	0.0010	mg/L	U	8081	1/6/03	20:03 V1311/SW351		ZP
TCLP Heptachlor	J	10	0.0010	0.0010	mg/L	U	8081	1/6/03	20:03 V1311/SW351		ZP
TCLP Heptachlor Epoxide	J	10	0.0010	0.0010	mg/L	U	8081	1/6/03	20:03 V1311/SW351		ZP
TCLP Lindane	J	10	0.0010	0.0010	mg/L	U	8081	1/6/03	20:03 V1311/SW351		ZP
TCLP Methoxychlor	J	10	0.025	0.025	mg/L	U	8081	1/6/03	20:03 V1311/SW351		ZP
TCLP Toxaphene	J	10	0.031	0.031	mg/L	U	8081	1/6/03	20:03 V1311/SW351		ZP
							8081	1/6/03	20:03 V1311/SW351		ZP

TCLP Semi-Volatile Organic Compounds

Analytes:	Lab	Dilution	MRL	Results	Units	Qualifier	Analysis Method	Analysis Date/Time	Prep Method	Prep Date/Time	Analyst
1,4-Dichlorobenzene	J	10	29	29	µg/L	U	SW8270C	1/6/03	21:52 V1311/SW351		ZP
2,4,5-Trichlorophenol	J	10	35	35	mg/L	U, J4	SW8270C	1/6/03	21:52 V1311/SW351		ZP
2,4,6-Trichlorophenol	J	10	22	22	µg/L	U	SW8270C	1/6/03	21:52 V1311/SW351		ZP
2,4-Dinitrotoluene	J	10	9.4	9.4	µg/L	U	SW8270C	1/6/03	21:52 V1311/SW351		ZP
2-Methylphenol	J	10	23	23	mg/L	U	SW8270C	1/6/03	21:52 V1311/SW351		ZP
3&4-Methylphenol	J	10	62	62	µg/L	U	SW8270C	1/6/03	21:52 V1311/SW351		ZP
Hexachlorobenzene	J	10	18	18	µg/L	U	SW8270C	1/6/03	21:52 V1311/SW351		ZP
Hexachlorobutadiene	J	10	21	21	µg/L	U	SW8270C	1/6/03	21:52 V1311/SW351		ZP
Hexachloroethane	J	10	28	28	µg/L	U	SW8270C	1/6/03	21:52 V1311/SW351		ZP
Nitrobenzene	J	10	10	10	µg/L	U	SW8270C	1/6/03	21:52 V1311/SW351		ZP
Pentachlorophenol	J	10	32	32	µg/L	U, J4	SW8270C	1/6/03	21:52 V1311/SW351		ZP
Pyridine	J	10	18	18	µg/L	U	SW8270C	1/6/03	21:52 V1311/SW351		ZP
							SW8270C	1/6/03	21:52 V1311/SW351		ZP

TCLP Volatile Organics

Analytes:	Lab	Dilution	MRL	Results	Units	Qualifier	Analysis Method	Analysis Date/Time	Prep Method	Prep Date/Time	Analyst
1,1-Dichloroethene	J	10	0.010	0.010	mg/L	U	8260	12/31/02	16:58 V1311/SW503		JA
1,2-Dichloroethane	J	10	0.010	0.010	mg/L	U	8260	12/31/02	16:58 V1311/SW503		JA

Advanced Environmental Laboratories, Inc.

Analytical Report

Client: Howco, Inc.
 Project Name: Annual Compliance
 Matrix: Soils/Solids

Report No.: T0210209
 Date/Time Sampled: 12/27/02 8:10
 Date/Time Received: 12/27/02 10:30

Lab Code: T0210209-02

Client Sample ID: WWTS

Sampled By: James Jones

Shipping Method: AEL Pick-up

Benzene	J	10	0.010	0.27	mg/L		8260	12/31/02	16:58 V1311/SW5031	JA
Carbon Tetrachloride	J	10	0.010	0.010	mg/L	U	8260	12/31/02	16:58 V1311/SW5031	JA
Chlorobenzene	J	10	0.010	0.010	mg/L	U	8260	12/31/02	16:58 V1311/SW5031	JA
Chloroform	J	10	0.010	0.010	mg/L	U	8260	12/31/02	16:58 V1311/SW5031	JA
Methyl ethyl ketone	J	10	0.050	0.026	mg/L		8260	12/31/02	16:58 V1311/SW5031	JA
Tetrachloroethene	J	10	0.010	0.059	mg/L		8260	12/31/02	16:58 V1311/SW5031	JA
Trichloroethene	J	10	0.010	0.010	mg/L	U	8260	12/31/02	16:58 V1311/SW5031	JA
Vinyl Chloride	J	10	0.010	0.010	mg/L	U	8260	12/31/02	16:58 V1311/SW5031	JA
Surrogates:										
Decachlorobiphenyl		Control Limits	Percent Recovery	Qual.	Method	Analysis Date	Prep Method	Prep Date	Analyst	
Decachlorobiphenyl		70 - 130	83 %		8081	1/6/03	SW1311/SW3510C		ZP	
Tetrachloro-m-xylene		30 - 120	83 %		8081	1/6/03	SW1311/SW3510C		ZP	
1,2-Dichloroethane-d4		30 - 120	73 %		8081	1/6/03	SW1311/SW3510C		ZP	
4-Bromofluorobenzene		80 - 120	109 %		8260	12/31/02	SW1311/SW5030B		JA	
Toluene d(8)		86 - 115	107 %		8260	12/31/02	SW1311/SW5030B		JA	
2,4,6-Tribromophenol		88 - 110	101 %		8260	12/31/02	SW1311/SW5030B		JA	
2-Fluorobiphenyl		15 - 112	90 %		SW8270C	1/6/03	SW1311/SW3510C		ZP	
2-Fluorophenol		20 - 119	38 %		SW8270C	1/6/03	SW1311/SW3510C		ZP	
Nitrobenzene d5		20 - 119	26 %		SW8270C	1/6/03	SW1311/SW3510C		ZP	
p-Terphenyl-d14		23 - 120	41 %		SW8270C	1/6/03	SW1311/SW3510C		ZP	
Phenol-d6		18 - 137	66 %		SW8270C	1/6/03	SW1311/SW3510C		ZP	
		18 - 121	19 %		SW8270C	1/6/03	SW1311/SW3510C		ZP	

- AIC Alternate initial calibration criteria used (mean RSD <15%)
 J4 The sample matrix interfered with the ability to make an accurate determination.
 U The compound was analyzed for but not detected.
 All soil results are reported in dry weight basis
 MRL Method Reporting Limit
 J DOH certification #E82574 (AEL-JAX) (FL NELAC certification)
 ED DOH Certification #E86188 (Envirodyne)

Advanced Environmental Laboratories, Inc.

Analytical Report

Client: Howco, Inc.
 Project Name: Annual Compliance
 Matrix: Ground Water

Report No.: T0210209
 Date/Time Sampled: 12/27/02 8:45
 Date/Time Received: 12/27/02 10:30

Lab Code: T0210209-03
 Client Sample ID: EQ Blank

Sampled By: James Jones
 Shipping Method: AEL Pick-up

Base-Neutral/Acid Extractable Organic Compounds

Analytes:	Lab	Dilution	MRL	Results	Units	Qualifier	Analysis Method	Analysis Date/Time	Prep Method	Prep Date/Time	Analyst
1,2,4,5-Tetrachlorobenzene	J	10	100	100	µg/L	U	8270	1/6/03 21:52	SW3510C	1/3/03 9:15	ZP
1,2,4-Trichlorobenzene	J	10	100	100	µg/L	U	8270	1/6/03 21:52	SW3510C	1/3/03 9:15	ZP
1,2-Dichlorobenzene	J	10	100	100	µg/L	U	8270	1/6/03 21:52	SW3510C	1/3/03 9:15	ZP
1,2-Diphenylhydrazine	J	10	100	100	µg/L	U	8270	1/6/03 21:52	SW3510C	1/3/03 9:15	ZP
1,3-Dichlorobenzene	J	10	100	100	µg/L	U	8270	1/6/03 21:52	SW3510C	1/3/03 9:15	ZP
1,4-Dichlorobenzene	J	10	100	100	µg/L	U	8270	1/6/03 21:52	SW3510C	1/3/03 9:15	ZP
1-Methylnaphthalene	J	10	100	100	µg/L	U	8270	1/6/03 21:52	SW3510C	1/3/03 9:15	ZP
1-Naphthylamine	J	10	100	100	µg/L	U	8270	1/6/03 21:52	SW3510C	1/3/03 9:15	ZP
2,3,4,6-Tetrachlorophenol	J	10	100	100	µg/L	U	8270	1/6/03 21:52	SW3510C	1/3/03 9:15	ZP
2,4,5-Trichlorophenol	J	10	100	100	µg/L	U	8270	1/6/03 21:52	SW3510C	1/3/03 9:15	ZP
2,4,6-Trichlorophenol	J	10	100	100	µg/L	U	8270	1/6/03 21:52	SW3510C	1/3/03 9:15	ZP
2,4-Dichlorophenol	J	10	100	100	µg/L	U	8270	1/6/03 21:52	SW3510C	1/3/03 9:15	ZP
2,4-Dimethylphenol	J	10	100	100	µg/L	U	8270	1/6/03 21:52	SW3510C	1/3/03 9:15	ZP
2,4-Dinitrophenol	J	10	100	100	µg/L	U	8270	1/6/03 21:52	SW3510C	1/3/03 9:15	ZP
2,4-Dinitrotoluene	J	10	100	100	µg/L	U	AIC 8270	1/6/03 21:52	SW3510C	1/3/03 9:15	ZP
2,6-Dinitrotoluene	J	10	100	100	µg/L	U	AIC 8270	1/6/03 21:52	SW3510C	1/3/03 9:15	ZP
2-Chloronaphthalene	J	10	100	100	µg/L	U	AIC 8270	1/6/03 21:52	SW3510C	1/3/03 9:15	ZP
2-Chlorophenol	J	10	100	100	µg/L	U	8270	1/6/03 21:52	SW3510C	1/3/03 9:15	ZP
2-Methylnaphthalene	J	10	100	100	µg/L	U	8270	1/6/03 21:52	SW3510C	1/3/03 9:15	ZP
2-Methylphenol (o-Cresol)	J	10	100	100	µg/L	U	8270	1/6/03 21:52	SW3510C	1/3/03 9:15	ZP
2-Naphthylamine	J	10	100	100	µg/L	U	8270	1/6/03 21:52	SW3510C	1/3/03 9:15	ZP
2-Nitroaniline	J	10	100	100	µg/L	U	8270	1/6/03 21:52	SW3510C	1/3/03 9:15	ZP
2-Nitrophenol	J	10	100	100	µg/L	U	AIC 8270	1/6/03 21:52	SW3510C	1/3/03 9:15	ZP
2-Picoline	J	10	100	100	µg/L	U	8270	1/6/03 21:52	SW3510C	1/3/03 9:15	ZP
3,3'-Dichlorobenzidine	J	10	100	100	µg/L	U	8270	1/6/03 21:52	SW3510C	1/3/03 9:15	ZP
3,4-Methylphenol(m&p-Cresol)	J	10	100	100	µg/L	U	8270	1/6/03 21:52	SW3510C	1/3/03 9:15	ZP
3-Methylcholanthrene	J	10	100	100	µg/L	U	8270	1/6/03 21:52	SW3510C	1/3/03 9:15	ZP
3-Nitroaniline	J	10	100	100	µg/L	U	8270	1/6/03 21:52	SW3510C	1/3/03 9:15	ZP
4,6-Dinitro-2-methylphenol	J	10	100	100	µg/L	U	AIC 8270	1/6/03 21:52	SW3510C	1/3/03 9:15	ZP
4-Aminobiphenyl	J	10	100	100	µg/L	U	AIC 8270	1/6/03 21:52	SW3510C	1/3/03 9:15	ZP
4-Bromophenyl phenyl ether	J	10	100	100	µg/L	U	8270	1/6/03 21:52	SW3510C	1/3/03 9:15	ZP
4-Chloro-3-methylphenol	J	10	100	100	µg/L	U	8270	1/6/03 21:52	SW3510C	1/3/03 9:15	ZP
4-Chloroaniline	J	10	100	100	µg/L	U	8270	1/6/03 21:52	SW3510C	1/3/03 9:15	ZP
4-Chlorophenyl Phenyl Ether	J	10	100	100	µg/L	U	8270	1/6/03 21:52	SW3510C	1/3/03 9:15	ZP
4-Nitroaniline	J	10	100	100	µg/L	U	8270	1/6/03 21:52	SW3510C	1/3/03 9:15	ZP
4-Nitrophenol	J	10	100	100	µg/L	U	8270	1/6/03 21:52	SW3510C	1/3/03 9:15	ZP
7,12-Dimethylbenz(a)anthracen	J	10	100	100	µg/L	U	AIC 8270	1/6/03 21:52	SW3510C	1/3/03 9:15	ZP
a,a-Dimethylphenethylamine	J	10	100	100	µg/L	U	8270	1/6/03 21:52	SW3510C	1/3/03 9:15	ZP
Acenaphthene	J	10	100	100	µg/L	U	8270	1/6/03 21:52	SW3510C	1/3/03 9:15	ZP
Acenaphthylene	J	10	100	100	µg/L	U	8270	1/6/03 21:52	SW3510C	1/3/03 9:15	ZP
Acetophenone	J	10	100	100	µg/L	U	8270	1/6/03 21:52	SW3510C	1/3/03 9:15	ZP
Aniline	J	10	100	100	µg/L	U	8270	1/6/03 21:52	SW3510C	1/3/03 9:15	ZP
Anthracene	J	10	100	100	µg/L	U	8270	1/6/03 21:52	SW3510C	1/3/03 9:15	ZP
Benzidine	J	10	100	100	µg/L	U	8270	1/6/03 21:52	SW3510C	1/3/03 9:15	ZP

Advanced Environmental Laboratories, Inc.

Analytical Report

Client: Howco, Inc.
 Project Name: Annual Compliance
 Matrix: Ground Water

Report No.: T0210209

Date/Time Sampled: 12/27/02 8:45

Date/Time Received: 12/27/02 10:30

Lab Code: T0210209-03

Client Sample ID: EQ Blank

Sampled By: James Jones

Shipping Method: AEL Pick-up

Benzo(a)anthracene	J	10	100	100	µg/L	U	8270	1/6/03	21:52	SW3510C	1/3/03 9:15	ZP
Benzo(a)pyrene	J	10	100	100	µg/L	U	8270	1/6/03	21:52	SW3510C	1/3/03 9:15	ZP
Benzo(b)fluoranthene	J	10	100	100	µg/L	U	8270	1/6/03	21:52	SW3510C	1/3/03 9:15	ZP
Benzo(g,h,i)perylene	J	10	100	100	µg/L	U	8270	1/6/03	21:52	SW3510C	1/3/03 9:15	ZP
Benzo(k)fluoranthene	J	10	100	100	µg/L	U	8270	1/6/03	21:52	SW3510C	1/3/03 9:15	ZP
Benzoic Acid	J	10	100	100	µg/L	U	8270	1/6/03	21:52	SW3510C	1/3/03 9:15	ZP
Benzyl Alcohol	J	10	100	100	µg/L	U	8270	1/6/03	21:52	SW3510C	1/3/03 9:15	ZP
Benzyl Butyl Phthalate	J	10	100	100	µg/L	U	8270	1/6/03	21:52	SW3510C	1/3/03 9:15	ZP
Bis(2-chloroethoxy)methane	J	10	100	100	µg/L	U	8270	1/6/03	21:52	SW3510C	1/3/03 9:15	ZP
Bis(2-chloroethyl) Ether	J	10	100	100	µg/L	U	8270	1/6/03	21:52	SW3510C	1/3/03 9:15	ZP
Bis(2-chloroisopropyl) Ether	J	10	100	100	µg/L	U	8270	1/6/03	21:52	SW3510C	1/3/03 9:15	ZP
Bis(2-ethylhexyl) Phthalate	J	10	100	100	µg/L	U	8270	1/6/03	21:52	SW3510C	1/3/03 9:15	ZP
Chrysene	J	10	100	100	µg/L	U	8270	1/6/03	21:52	SW3510C	1/3/03 9:15	ZP
Di-n-butyl Phthalate	J	10	100	100	µg/L	U	8270	1/6/03	21:52	SW3510C	1/3/03 9:15	ZP
Di-n-octyl Phthalate	J	10	100	100	µg/L	U	8270	1/6/03	21:52	SW3510C	1/3/03 9:15	ZP
Dibenzo(a,h)anthracene	J	10	100	100	µg/L	U	8270	1/6/03	21:52	SW3510C	1/3/03 9:15	ZP
Dibenzofuran	J	10	100	100	µg/L	U	8270	1/6/03	21:52	SW3510C	1/3/03 9:15	ZP
Diethyl Phthalate	J	10	100	100	µg/L	U	8270	1/6/03	21:52	SW3510C	1/3/03 9:15	ZP
Dimethyl Phthalate	J	10	100	100	µg/L	U	8270	1/6/03	21:52	SW3510C	1/3/03 9:15	ZP
Ethyl Methanesulfonate	J	10	100	100	µg/L	U	8270	1/6/03	21:52	SW3510C	1/3/03 9:15	ZP
Fluoranthene	J	10	100	100	µg/L	U	8270	1/6/03	21:52	SW3510C	1/3/03 9:15	ZP
Fluorene	J	10	100	100	µg/L	U	8270	1/6/03	21:52	SW3510C	1/3/03 9:15	ZP
Hexachlorbenzene	J	10	100	100	µg/L	U	8270	1/6/03	21:52	SW3510C	1/3/03 9:15	ZP
Hexachlorobenzene	J	10	100	100	µg/L	U	8270	1/6/03	21:52	SW3510C	1/3/03 9:15	ZP
Hexachlorobutadiene	J	10	100	100	µg/L	U	8270	1/6/03	21:52	SW3510C	1/3/03 9:15	ZP
Hexachlorocyclopentadiene	J	10	100	100	µg/L	U	8270	1/6/03	21:52	SW3510C	1/3/03 9:15	ZP
Hexachloroethane	J	10	100	100	µg/L	U	8270	1/6/03	21:52	SW3510C	1/3/03 9:15	ZP
Indeno(1,2,3-cd)pyrene	J	10	100	100	µg/L	U	8270	1/6/03	21:52	SW3510C	1/3/03 9:15	ZP
Isophorone	J	10	100	100	µg/L	U	8270	1/6/03	21:52	SW3510C	1/3/03 9:15	ZP
Methyl Methanesulfonate	J	10	100	100	µg/L	U	8270	1/6/03	21:52	SW3510C	1/3/03 9:15	ZP
N-Nitroso-di-n-butylamine	J	10	100	100	µg/L	U	8270	1/6/03	21:52	SW3510C	1/3/03 9:15	ZP
N-Nitrosodi-n-propylamine	J	10	100	100	µg/L	U	8270	1/6/03	21:52	SW3510C	1/3/03 9:15	ZP
N-Nitrosodimethylamine	J	10	100	100	µg/L	U	8270	1/6/03	21:52	SW3510C	1/3/03 9:15	ZP
N-Nitrosodiphenylamine	J	10	100	100	µg/L	U	8270	1/6/03	21:52	SW3510C	1/3/03 9:15	ZP
N-Nitrosopiperidine	J	10	100	100	µg/L	U	8270	1/6/03	21:52	SW3510C	1/3/03 9:15	ZP
Naphthalene	J	10	100	100	µg/L	U	8270	1/6/03	21:52	SW3510C	1/3/03 9:15	ZP
Nitrobenzene	J	10	100	100	µg/L	U	8270	1/6/03	21:52	SW3510C	1/3/03 9:15	ZP
p-Dimethylaminoazobenzene	J	10	100	100	µg/L	U	8270	1/6/03	21:52	SW3510C	1/3/03 9:15	ZP
Pentachlorbenzene	J	10	100	100	µg/L	U	8270	1/6/03	21:52	SW3510C	1/3/03 9:15	ZP
Pentachloronitrobenzene	J	10	100	100	µg/L	U	8270	1/6/03	21:52	SW3510C	1/3/03 9:15	ZP
Pentachlorophenol	J	10	100	100	µg/L	U	8270	1/6/03	21:52	SW3510C	1/3/03 9:15	ZP
Phenacetin	J	10	100	100	µg/L	U	8270	1/6/03	21:52	SW3510C	1/3/03 9:15	ZP
Phenanthrene	J	10	100	100	µg/L	U	8270	1/6/03	21:52	SW3510C	1/3/03 9:15	ZP
Phenol	J	10	100	100	µg/L	U	8270	1/6/03	21:52	SW3510C	1/3/03 9:15	ZP
Pronamide	J	10	100	100	µg/L	U	8270	1/6/03	21:52	SW3510C	1/3/03 9:15	ZP
Pyrene	J	10	100	100	µg/L	U	8270	1/6/03	21:52	SW3510C	1/3/03 9:15	ZP

Advanced Environmental Laboratories, Inc.

Analytical Report

Client: Howco, Inc.
 Project Name: Annual Compliance
 Matrix: Ground Water

Report No.: T0210209
 Date/Time Sampled: 12/27/02 8:45
 Date/Time Received: 12/27/02 10:30

Lab Code: T0210209-03
 Client Sample ID: EQ Blank

Sampled By: James Jones
 Shipping Method: AEL Pick-up

Chlorinated Pesticides

Analytes:	Lab	Dilution	MRL	Results	Units	Qualifier	Analysis Method	Analysis Date/Time	Prep Method	Prep Date/Time	Analyst
4,4'-DDD	J	10	1.0	1.0	µg/L	U	8081	1/6/03 20:03	SW3510C	1/2/03 10:00	ZP
4,4'-DDE	J	10	1.0	1.0	µg/L	U	8081	1/6/03 20:03	SW3510C	1/2/03 10:00	ZP
4,4'-DDT	J	10	1.0	1.0	µg/L	U	8081	1/6/03 20:03	SW3510C	1/2/03 10:00	ZP
Aldrin	J	10	1.0	1.0	µg/L	U	8081	1/6/03 20:03	SW3510C	1/2/03 10:00	ZP
Alpha-BHC	J	10	1.0	1.0	µg/L	U	8081	1/6/03 20:03	SW3510C	1/2/03 10:00	ZP
Beta-BHC	J	10	1.0	1.0	µg/L	U	8081	1/6/03 20:03	SW3510C	1/2/03 10:00	ZP
Chlordane	J	10	10	10	µg/L	U	8081	1/6/03 20:03	SW3510C	1/2/03 10:00	ZP
Delta-BHC	J	10	1.0	1.0	µg/L	U	8081	1/6/03 20:03	SW3510C	1/2/03 10:00	ZP
Dieldrin	J	10	1.0	1.0	µg/L	U	8081	1/6/03 20:03	SW3510C	1/2/03 10:00	ZP
Endosulfan I	J	10	1.0	1.0	µg/L	U	8081	1/6/03 20:03	SW3510C	1/2/03 10:00	ZP
Endosulfan II	J	10	1.0	1.0	µg/L	U	8081	1/6/03 20:03	SW3510C	1/2/03 10:00	ZP
Endosulfan Sulfate	J	10	1.0	1.0	µg/L	U	8081	1/6/03 20:03	SW3510C	1/2/03 10:00	ZP
Endrin	J	10	1.0	1.0	µg/L	U	8081	1/6/03 20:03	SW3510C	1/2/03 10:00	ZP
Endrin Aldehyde	J	10	1.0	1.0	µg/L	U	8081	1/6/03 20:03	SW3510C	1/2/03 10:00	ZP
Gamma-BHC (Lindane)	J	10	1.0	1.0	µg/L	U	8081	1/6/03 20:03	SW3510C	1/2/03 10:00	ZP
Heptachlor	J	10	1.0	1.0	µg/L	U	8081	1/6/03 20:03	SW3510C	1/2/03 10:00	ZP
Heptachlor Epoxide	J	10	1.0	1.0	µg/L	U	8081	1/6/03 20:03	SW3510C	1/2/03 10:00	ZP
Methoxychlor	J	10	1.0	1.0	µg/L	U	8081	1/6/03 20:03	SW3510C	1/2/03 10:00	ZP
Toxaphene	J	10	10	10	µg/L	U	8081	1/6/03 20:03	SW3510C	1/2/03 10:00	ZP

Herbicides

Analytes:	Lab	Dilution	MRL	Results	Units	Qualifier	Analysis Method	Analysis Date/Time	Prep Method	Prep Date/Time	Analyst
2,4,5-T	ED	1	1.0	1.0	µg/L	U	8151	1/9/03			MC
2,4,5-TP (Silvex)	ED	1	1.0	1.0	µg/L	U	8151	1/9/03			MC
2,4-D	ED	1	1.0	1.0	µg/L	U	8151	1/9/03			MC
2,4-DB	ED	1	1.0	1.0	µg/L	U	8151	1/9/03			MC
4-Nitrophenol	ED	1	1.0	1.0	µg/L	U	8151	1/9/03			MC
Dalapon	ED	1	1.0	1.0	µg/L	U	8151	1/9/03			MC
Dicamba	ED	1	1.0	1.0	µg/L	U	8151	1/9/03			MC
Dichlorprop	ED	1	1.0	1.0	µg/L	U	8151	1/9/03			MC
Dinoseb	ED	1	1.0	1.0	µg/L	U	8151	1/9/03			MC
MCPA	ED	1	50	50	µg/L	U	8151	1/9/03			MC
MCPP	ED	1	50	50	µg/L	U	8151	1/9/03			MC
Pentachlorophenol	ED	1	1.0	1.0	µg/L	U	8151	1/9/03			MC

Total Metals

Analytes:	Lab	Dilution	MRL	Results	Units	Qualifier	Analysis Method	Analysis Date/Time	Prep Method	Prep Date/Time	Analyst
Arsenic	J	1	0.010	0.010	mg/L	U	6010	12/31/02 11:30	SW3010A	12/31/02 7:30	DS
Barium	J	1	0.010	0.010	mg/L	U	6010	12/31/02 11:30	SW3010A	12/31/02 7:30	DS
Cadmium	J	1	0.0050	0.0050	mg/L	U	6010	12/31/02 11:30	SW3010A	12/31/02 7:30	DS
Chromium	J	1	0.010	0.010	mg/L	U	6010	12/31/02 11:30	SW3010A	12/31/02 7:30	DS
Lead	J	1	0.010	0.010	mg/L	U	6010	12/31/02 11:30	SW3010A	12/31/02 7:30	DS
Mercury	J	1	0.00020	0.00020	mg/L	U	7470	1/3/03 8:56	SW7470A	1/3/03 5:00	TP
Selenium	J	1	0.020	0.020	mg/L	U	6010	12/31/02 11:30	SW3010A	12/31/02 7:30	DS

Advanced Environmental Laboratories, Inc.

Analytical Report

Client: Howco, Inc.
 Project Name: Annual Compliance
 Matrix: Ground Water

Report No.: T0210209
 Date/Time Sampled: 12/27/02 8:45
 Date/Time Received: 12/27/02 10:30

Lab Code: T0210209-03
 Client Sample ID: EQ Blank

Sampled By: James Jones
 Shipping Method: AEL Pick-up

Silver	J	1	0.010	0.010	mg/L	U	6010	12/31/02	11:30	SW3010A	12/31/02 7:30	DS
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Volatile Organic Hydrocarbons

Analytes:	Lab	Dilution	MRL	Results	Units	Qualifier	Analysis Method	Analysis Date/Time	Prep Method	Prep Date/Time	Analyst
1,1,1-Trichloroethane	J	10	10	1.0	µg/L	U	8260	12/31/02 16:58	SW5030B		JA
1,1,2,2-Tetrachloroethane	J	10	10	1.0	µg/L	U	8260	12/31/02 16:58	SW5030B		JA
1,1,2-Trichloroethane	J	10	10	1.0	µg/L	U	8260	12/31/02 16:58	SW5030B		JA
1,1-Dichloroethane	J	10	10	1.0	µg/L	U	8260	12/31/02 16:58	SW5030B		JA
1,1-Dichloroethene	J	10	10	1.0	µg/L	U	8260	12/31/02 16:58	SW5030B		JA
1,2-Dichlorobenzene	J	10	10	1.0	µg/L	U	8260	12/31/02 16:58	SW5030B		JA
1,2-Dichloroethane	J	10	10	1.0	µg/L	U	8260	12/31/02 16:58	SW5030B		JA
1,2-Dichloropropane	J	10	10	1.0	µg/L	U	8260	12/31/02 16:58	SW5030B		JA
1,3-Dichlorobenzene	J	10	10	1.0	µg/L	U	8260	12/31/02 16:58	SW5030B		JA
1,4-Dichlorobenzene	J	10	10	1.0	µg/L	U	8260	12/31/02 16:58	SW5030B		JA
2-Chloroethyl Vinyl Ether	J	10	100	10	µg/L	U	8260	12/31/02 16:58	SW5030B		JA
Benzene	J	10	10	1.0	µg/L	U	8260	12/31/02 16:58	SW5030B		JA
Bromodichloromethane	J	10	10	1.0	µg/L	U	8260	12/31/02 16:58	SW5030B		JA
Bromoform	J	10	10	1.0	µg/L	U	8260	12/31/02 16:58	SW5030B		JA
Bromomethane	J	10	10	1.0	µg/L	U	8260	12/31/02 16:58	SW5030B		JA
Carbon Tetrachloride	J	10	10	1.0	µg/L	U	8260	12/31/02 16:58	SW5030B		JA
Chlorobenzene	J	10	10	1.3	µg/L	U	8260	12/31/02 16:58	SW5030B		JA
Chloroethane	J	10	10	1.0	µg/L	U	8260	12/31/02 16:58	SW5030B		JA
Chloroform	J	10	10	1.0	µg/L	U	8260	12/31/02 16:58	SW5030B		JA
Chloromethane	J	10	10	1.0	µg/L	U	8260	12/31/02 16:58	SW5030B		JA
Cis-1,2-dichloroethene	J	10	10	1.0	µg/L	U	8260	12/31/02 16:58	SW5030B		JA
Cis-1,3-dichloropropene	J	10	10	1.0	µg/L	U	8260	12/31/02 16:58	SW5030B		JA
Dibromochloromethane	J	10	10	1.0	µg/L	U	8260	12/31/02 16:58	SW5030B		JA
Dichlorodifluoromethane	J	10	10	1.0	µg/L	U	8260	12/31/02 16:58	SW5030B		JA
Ethylbenzene	J	10	10	1.0	µg/L	U	8260	12/31/02 16:58	SW5030B		JA
m&p-Xylenes	J	10	10	1.0	µg/L	U	8260	12/31/02 16:58	SW5030B		JA
Methyl-tert-butyl Ether	J	10	10	1.0	µg/L	U	8260	12/31/02 16:58	SW5030B		JA
Methylene Chloride	J	10	50	5.0	µg/L	U	8260	12/31/02 16:58	SW5030B		JA
o-Xylene	J	10	10	1.0	µg/L	U	8260	12/31/02 16:58	SW5030B		JA
Tetrachloroethene	J	10	10	1.0	µg/L	U	8260	12/31/02 16:58	SW5030B		JA
Toluene	J	10	10	1.0	µg/L	U	8260	12/31/02 16:58	SW5030B		JA
Trans-1,2-dichloroethene	J	10	10	1.0	µg/L	U	8260	12/31/02 16:58	SW5030B		JA
Trans-1,3-dichloropropene	J	10	10	1.0	µg/L	U	8260	12/31/02 16:58	SW5030B		JA
Trichloroethene	J	10	10	1.0	µg/L	U	8260	12/31/02 16:58	SW5030B		JA
Trichlorofluoromethane	J	10	10	1.0	µg/L	U	8260	12/31/02 16:58	SW5030B		JA
Vinyl Chloride	J	10	10	1.0	µg/L	U	8260	12/31/02 16:58	SW5030B		JA

Advanced Environmental Laboratories, Inc.

Analytical Report

Client: Howco, Inc.
Project Name: Annual Compliance
Matrix: Ground Water

Report No.: T0210209
Date/Time Sampled: 12/27/02 8:45
Date/Time Received: 12/27/02 10:30

Lab Code: T0210209-03
Client Sample ID: EQ Blank

Sampled By: James Jones
Shipping Method: AEL Pick-up

Surrogates:	Control Limits	Percent Recovery	Qual.	Method	Analysis Date	Prep Method	Prep Date	Analyst
Decachlorobiphenyl	30 - 120	60 %		8081	1/6/03	SW3510C	1/2/03	ZP
Tetrachloro-m-xylene	30 - 120	79 %		8081	1/6/03	SW3510C	1/2/03	ZP
1,2-Dichloroethane-d4	80 - 120	111 %		8260	12/31/02	SW5030B		JA
4-Bromofluorobenzene	86 - 115	107 %		8260	12/31/02	SW5030B		JA
Toluene d(8)	88 - 110	105 %		8260	12/31/02	SW5030B		JA
2,4,6-Tribromophenol	15 - 112	86 %		8270	1/6/03	SW3510C	1/3/03	ZP
2-Fluorobiphenyl	20 - 119	53 %		8270	1/6/03	SW3510C	1/3/03	ZP
2-Fluorophenol	20 - 119	37 %		8270	1/6/03	SW3510C	1/3/03	ZP
Nitrobenzene d5	23 - 120	59 %		8270	1/6/03	SW3510C	1/3/03	ZP
p-Terphenyl-d14	18 - 137	118 %		8270	1/6/03	SW3510C	1/3/03	ZP
Phenol-d6	18 - 121	26 %		8270	1/6/03	SW3510C	1/3/03	ZP

AIC Alternate initial calibration criteria used (mean RSD <15%)
 U The compound was analyzed for but not detected.
 All soil results are reported in dry weight basis
 MRL Method Reporting Limit
 ✓ DOH certification #E82574 (AEL-JAX) (FL NELAC certification)
 ED DOH Certification #E86188 (Envirodyne)



Environmental Laboratories, Inc.

LAB NUMBER: T0210209

Page of

Gephart, Albert

From: rdillen@tampabay.rr.com
Sent: Friday, December 20, 2002 1:09 PM
To: Gephart, Albert
Subject: Annual sampling of E.O.S. and W.W.T.S.

Al,

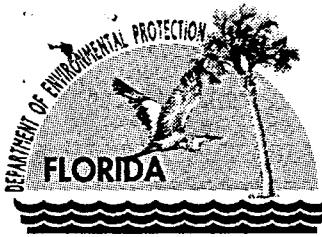
The sampling of Oil Extraction Sludge (O.E.S.) from Tank-110 and WasteWater Treatment Sludge (W.W.T.S.) from the sludge press is scheduled for Friday, December 27th.

Advanced Environmental Laboratories (A.E.L.) will perform the sampling and testing for full Tc1p parameters (Metals, Volatiles, Semi-Volatiles, Pesticides and Herbicides).

In addition to the two wastestream samples, A.E.L. also suggests to perform two so called 'Equipment Blanks', which of course would double HOWCO's analytical cost. Does the Department require these equipment blanks?

Please advise.

Richard Dillen, HOWCO Env.
Serv.



Jeb Bush
Governor

Department of Environmental Protection

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

David B. Struhs
Secretary

September 23, 2002

CERTIFIED - RETURN RECEIPT

7000 1670 0013 3095 4765

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



Subject: Hagan Holding Company d/b/a
HOWCO Environmental Services
EPA I.D. Number: FLD 152 764 767
Minor Modification of Permit 92465-H006-001
Pinellas County

Dear Mr. Hagan:

The Department has received your request, submitted on August 7, 2002, to modify the Secondary Incident Coordinator's address in Tables 7-3 and 8-2 of your permit application. Effective immediately:

Tim Hagan
3913 46th Avenue South
St. Petersburg, FL 33711
Home # 727-528-2958
Mobile # 727-638-3000

Is replaced by:

Tim Hagan
7100 Sunset Way
Unit 1208 W
St. Pete Beach, FL 33706
Home # 727-528-2958
Mobile # 727-638-3000

There are no other changes in this modification.

"More Protection, Less Process"

Printed on recycled paper.

FILE : 3-F
11/02

Mr. Tim Hagan, President
September 23, 2002
Page two

This letter must be attached to Hagan Holding Company d/b/a HOWCO Environmental Services' permit 92465-H006-001 and becomes part of that permit. All information submitted for the modification of the permit becomes part of the permit application.

If you have any questions or need additional information, please contact Bill Parker at (850) 488-0300 or bill.parker@dep.state.fl.us

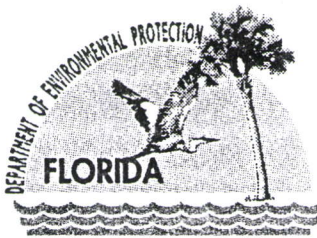
Sincerely,



Satish Kastury,
Environmental Administrator
Hazardous Waste Regulation

SK/wpp

cc: Stanley Tam, DEP/Tampa
Rick Neves, DEP/Tallahassee



Jeb Bush
Governor

Department of Environmental Protection

Twin Towers Office Building
2600 Blair Stone Road MS 4565
Tallahassee, Florida 32399-2400

David B. Struhs
Secretary

July 3, 2002

Mr. Tim Hagan, President
Hagan Holding Company
3701 Central Avenue
St. Petersburg, Florida 33713

Re: FLD 152 764 767 - HOWCO Environmental Services MPF

Dear Mr. Hagan:

I reviewed the documentation submitted to demonstrate financial assurance for the above referenced facility **and find it is in order.** United Bank letter of credit number 296-01, effective December 5, 2001, adequately covers the inflation adjusted closing cost estimate of \$62,050.91. In addition, Salem Trust Company standby trust fund agreement, entered into as of June 10, 2002, is acceptable. Therefore, HOWCO Environmental Services MPF is in compliance with the financial assurance requirements of 40 CFR Part 264, Subpart H, as adopted by reference in Rule 62-701.630, Florida Administrative Code, at this time.

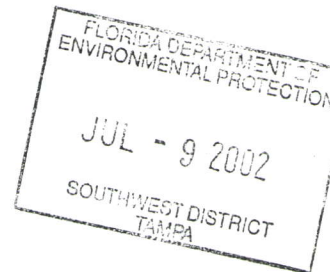
If you have any questions, please contact me at (850) 488-0300.

Sincerely,

Chad Fetrow
Environmental Specialist
Solid Waste Section

CWF

cc: Susan Pelz, FDEP/TPA
Fred Wick, FDEP/TLH



FILE! 3-F
10/02



Jeb Bush
Governor

Department of Environmental Protection

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

David B. Struhs
Secretary

May 20, 2002

CERTIFIED - RETURN RECEIPT

7000 0600 0026 4130 7091

D.E.P.
MAY 22 2002
Southwest District Tampa

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

SUBJECT: Permitted name change from "HOWCO Environmental Services" to "Hagan Holding Company d/b/a HOWCO Environmental Services", request dated April 29, 2002
EPA I.D. Number: FLD 152 764 767
Permit Number: 92465-HO06-001
Pinellas County

Dear Mr. Hagan:

This letter is in response to your request dated April 29, 2002 for a change of name on your permit. Your request has been approved. This permit is now in the name of "Hagan Holding Company d/b/a HOWCO Environmental Services".

Used Oil Processing Facility permits are issued and managed in the Tallahassee office, effective October 1, 2001. The new addresses that you need have been included in this permit modification.

In the course of processing your request, I found that 843 43rd Street South is at Lat/Long 27° 45' 40"N / 82° 41' 33"W and the section / township / range is 27 31S 16E. Please verify these data and inform me if you do not agree with them.

"More Protection, Less Process"

Printed on recycled paper.

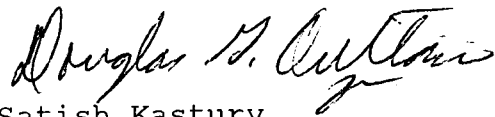
FILE: 3-F
9/02

Mr. Tim Hagan
May 20, 2002
Page two

The enclosed permit modification pages must be kept with your permit. These pages show the name change and change of the instructions for submittals.

If you have any questions or need additional information, please contact Bill Parker at (850) 488-0300 or bill.parker@dep.state.fl.us

Sincerely,

A handwritten signature in dark ink, appearing to read "Douglas B. Kastury". The signature is fluid and cursive, with a prominent "D" and "K".

Satish Kastury,
Environmental Administrator
Hazardous Waste Regulation

SK/wpp

cc: Stanley Tam, DEP/Tampa
Rick Neves, DEP/Tallahassee



Department of Environmental Protection

Jeb Bush
Governor

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

David B. Struhs
Secretary

PERMITTEE

Tim Hagan, President
Hagan Holding Company d/b/a
HOWCO Environmental Services
3701 Central Avenue
St. Petersburg, Florida 33713

I.D. Number: FLD 152 764 767
Permit Number: 92465-H006-001
Date of Issue: May 20, 2002
Date of Expiration: August 3,
2005
County: Pinellas County
Lat/Long: 27°45'40"/82°41'33"
Sect/Town/Range 27/31S/16E
Project: Operation of a Used Oil
and Material Processing
Facility

The wording of the existing conditions listed below is deleted
and replaced with the following specific conditions:

SPECIFIC CONDITIONS

Part I - STANDARD

2. Submittals

- a. All submittals in response to these conditions (except
Specific Condition I.2.b) shall be submitted as
follows:

- (1) Two (2) copies shall be sent to:

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

- (2) One (1) copy shall be sent to:

Hazardous Waste Section Manager
Southwest District Office
Department of Environmental Protection
3804 Coconut Palm Drive
Tampa, Florida 33619

- (3) Send a copy of the first page of any submittal requiring a fee along with the fee to:

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

All other conditions of the permit remain unchanged.



D.E.P.
APR 30 2002
Southwest District Tampa

April 29, 2002

Mr. Bill Parker
Hazardous Waste Regulation Section
Florida Department of Environmental Protection
Twin Towers Office Building
2600 Blair Stone Road
Tallahassee, FL 32399-2400

Re: HOWCO Environmental Services FLD 152 764 767
Permitted name change: Hagan Holding Co., d/b/a HOWCO Environment Services

Dear Mr. Parker:

As of January 1, 1986 HOWCO Environmental Services officially became Hagan Holding Company d/b/a HOWCO Environmental Services.

Please find attached the updated pages of Part I and Part II of the Permit Application Form, pertaining to this name change.

If you have any further questions, please do not hesitate to call me at (727) 327-8467, ext. 226.

Sincerely,

FOR: Tim Hagan
President

cc: Stanley Tam, FDEP, Tampa, w/attachment ✓
File, w/attachment

TH/jh

File: 3-F
8/02

APPLICATION FORM FOR A USED OIL PROCESSING FACILITY PERMIT

Part I

TO BE COMPLETED BY ALL APPLICANTS (Please type or print)

A. General Information

1. New _____ Renewal _____ Modification X Date old permit expires _____
2. Revision number 1
3. NOTE: Processors must also meet all applicable subparts, (describe compliance in process description for applicable standards) if they are:
 - X generators (Subpart C)
 - X transporters (Subpart E)
 - X burners of off-spec used oil (Subpart G)
 - X marketers (Subpart H)
 - or
 - X are disposing of used oil (Subpart I)
4. Date current operation began: 1972
5. Facility name: Hagan Holding Company dba HOWCO Environmental Services
6. EPA identification number: FLD 152 764 767
7. Facility location or street address: 843 43rd Street South, St. Petersburg
8. Facility mailing address:
3701 Central Avenue St. Petersburg, FL 33713-8338
Street or P.O. Box City State Zip Code
9. Contact person: Tim Hagan Telephone: (727) 327-8467
Title: President
Mailing Address:
3701 Central Avenue St. Petersburg, FL 33713-8338
Street or P.O. Box City State Zip Code
10. Operator's name: Tim Hagan Telephone: (727) 327-8467
Mailing Address:
3701 Central Avenue St. Petersburg, FL 33713-8338
Street or P.O. Box City State Zip Code
- 11 Facility owner's name: TIMCO Real Estate Telephone: (727) 327-8467
Mailing Address:
3701 Central Avenue St. Petersburg, FL 33713-8338
Street or P.O. Box City State Zip Code
- 12 Legal structure:
 - X corporation (indicate state of incorporation) Florida
 - _____ individual (list name and address of each owner in spaces provided below)
 - _____ partnership (list name and address of each owner in spaces provided below)
 - _____ other, e.g. government (please specify) _____

APPLICATION FORM FOR A USED OIL PROCESSING PERMIT

PART II - CERTIFICATION

TO BE COMPLETED BY ALL APPLICANTS

Form 62-710.901(a). Operator Certification

Facility Name: Hagan Holding Company dba EPA ID# FLD 152 764 767
HOWCO ENVIRONMENTAL Services

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gathered and evaluated the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment or knowing violations. Further, I agree to comply with the provisions of Chapter 403, Florida Statutes, Chapters 62-701 and 62-710, F.A.C., and all rules and regulations of the Department of Environmental Protection

Signature of the Operator or Authorized Representative*

Tim Hagan Pres
Tim Hagan, President
Name and Title (Please type or print)

Date: 4/29/2002 Telephone: (727) 327-8467

* If authorized representative, attach letter of authorization.

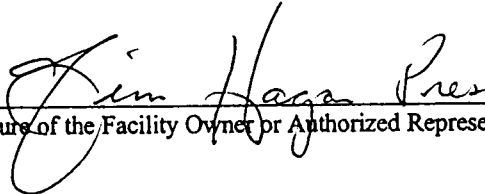
APPLICATION FROM FOR A USED OIL PROCESSING PERMIT

PART II - CERTIFICATION

Form 62-710.901(b). Facility Owner Certification

Facility Name: Hagan Holding Company dba EPA ID# FLD 152 764 767
HOWCO Environmental Services

This is to certify that I understand this application is submitted for the purpose of obtaining a permit to construct, or operate a used oil processing facility. As the facility owner, I understand fully that the facility operator and I are jointly responsible for compliance with the provisions of Chapter 403, Florida Statutes, Chapters 62-701 and 62-710, F.A.C. and all rules and regulations of the Department of Environmental Protection.



Signature of the Facility Owner or Authorized Representative*

Tim Hagan, President

Name and Title (Please type or print)

Date: 4/29/2002 Telephone: (727) 327-8467

* If authorized representative, attach letter of authorization.

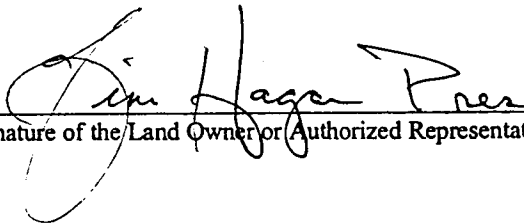
APPLICATION FROM FOR A USED OIL PROCESSING PERMIT

PART II - CERTIFICATION

Form 62-710.901(c) Land Owner Certification

Facility Name: Hagan Holding Company dba EPA ID# FLD 152 764 767
HOWCO Environmental Services

This is to certify that I, as land owner, understand that this application is submitted for the purpose of obtaining a permit to construct, or operate a used oil processing facility on the property as described.



Signature of the Land Owner or Authorized Representative*

Tim Hagan, President
Name and Title (Please type or print)

Date: 4/25/2002 Telephone: (727) 327-8467

* If authorized representative, attach letter of authorization.



Jeb Bush
Governor

Department of Environmental Protection

Southwest District
3804 Coconut Palm Drive
Tampa, Florida 33619

David B. Struhs
Secretary

April 1, 2002

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

Re: Letter dated January 16, 2002
BigSpark Fuel generation system

Dear Mr. Hagan:

On January 16, 2002, the Department received your request for authorization to operate the BigSpark Fuel generation system from the Department's Southwest District Air Permitting Section.

The letter states there are no air emissions during normal operation of the BigSpark system. There is a safety release mechanism that has the potential to vent gas to the atmosphere in the case of an emergency. Rule 62-210.300(3)(b), F.A.C., *Generic and Temporary Exemptions* (enclosed), exempts activities from air permitting if it would be subject to no unit specific applicable requirement, and it would neither emit nor have the potential to emit:

- 500 pounds per year or more of lead and lead compounds expressed as lead;
- 1,000 pounds per year or more of any hazardous air pollutant (HAP);
- 2,500 pounds per year or more of total HAPs; or
- 5.0 tons per year or more of any other regulated pollutant.

The operation shall not cause, suffer, allow, or permit the discharge of air pollutants from this facility which cause or contribute to an objectionable odor.
[Rules 62-296.320(2) and 62-210.200, Definitions-(Objectionable Odor), F.A.C.]

The letter states that the feedstock for the system will be used automotive antifreeze and used oil. Please be advised that hazardous waste antifreeze and used oil not meeting the specification requirements of 40 CFR 279.11 are not permissible feedstocks to the system.

HOWCO Environmental Services
March 7, 2002

Page 2 of 2

Based on the submitted information, there is no action necessary on either party's behalf.

If you have any questions, please call Mr. Jason Waters of my staff at (813) 744-6100 extension 105.

STATE OF FLORIDA DEPARTMENT
OF ENVIRONMENTAL PROTECTION



Gerald Kissel, P.E.
Air Permitting Supervisor
Southwest District

/jww

cc:  Stanley Tam, SWD
Gary Robbins, PCDEM

Electronic File: howcoletter.doc

27. Volume reduction processes as defined in Rule 62-296.417, F.A.C., wherein the owner or operator manages only spent mercury-containing lamps removed from the facility where the volume reduction process is located.

28. Mercury recovery processes as defined in Rule 62-296.417, F.A.C., wherein the owner or operator manages only mercury-containing devices temporarily or permanently removed from service from the owner or operator's own facilities or installations.

29. Bulk gasoline plants, provided:

a. Such operations are not conducted at a facility that is subject to the permitting requirements of Chapter 62-213, F.A.C., and the emissions from such operations would not contribute to total emissions that would make the facility subject to those requirements;

b. The facility receives and distributes only petroleum-based lubricants, gasoline, diesel fuel, mineral spirits and kerosene;

c. The total storage capacity for gasoline at the facility does not exceed 100,000 gallons;

d. The facility does not exceed a throughput rate (receive and distribute) of 1.3 million gallons of gasoline in any consecutive twelve-month period;

e. The facility is not subject to any Standard of Performance for New Stationary Sources (NSPS) requirement adopted by reference in Rule 62-204.800, F.A.C.; and

f. The facility is not subject to any volatile organic compound Reasonably Available Control Technology (RACT) requirement of Chapter 62-296, F.A.C.

30. Petroleum lubrication systems.

31. Application of fungicide, herbicide, or pesticide.

32. Asbestos renovation and demolition activities.

33. Non-halogenated solvent storage and cleaning operations, provided the solvents contain none of the hazardous air pollutants listed at Rule 62-210.200, F.A.C.

34. Vehicle refueling operations and associated fuel storage.

35. Restaurants.

36. Burning of drugs seized by law enforcement agencies in boilers with a heat input of 250 million BTU per hour or more.

37. Relocatable screening-only operations, provided:

a. The screening operation is not connected to a nonmetallic mineral processing plant subject to 40 CFR Part 60, Subpart OOO, adopted and incorporated by reference at Rule 62-204.800, F.A.C.;

b. No dry material is processed; and

c. No hazardous waste or toxic waste, as defined in Department rules, is processed.

38. Brownfield site remediation, as described at Rule 62-785.700, F.A.C., provided that the total volatile organic compounds in the air emissions from all onsite remediation equipment does not exceed 13.7 pounds per day.

* → (b) Generic and Temporary Exemptions.

1. Generic Emissions Unit Exemption. An emissions unit or pollutant-emitting activity that is not entitled to a categorical exemption pursuant to Rule 62-210.300(3)(a), F.A.C., shall be exempt from the permitting requirements of this chapter, Chapter 62-212, F.A.C., and Chapter 62-4, F.A.C., if it meets all of the following criteria:

a. It would be subject to no unit-specific applicable requirement.

b. It would neither emit nor have the potential to emit:

(i) 500 pounds per year or more of lead and lead compounds expressed as lead;

(ii) 1,000 pounds per year or more of any hazardous air pollutant;

(iii) 2,500 pounds per year or more of total hazardous air pollutants; or

(iv) 5.0 tons per year or more of any other regulated pollutant.

c. Its emissions, in combination with the emissions of other units and activities at the facility, would not cause the facility to emit or have the potential to emit any pollutant in such amount as to make the facility a Title V source.

d. In the case of a proposed new emissions unit at an existing facility, the emissions of such unit, in combination with the emissions of any other proposed new or modified units and activities at the facility, would not result in a modification subject to the preconstruction review requirements of Rule 62-204.800(10)(d)2., 62-212.400 or 62-212.500, F.A.C.

e. In the case of a proposed new pollutant-emitting activity, such activity would not constitute a modification of any existing non-exempt emissions unit at a non-Title V source or any existing non-insignificant emissions unit at a Title V source.

2. Generic Facility Exemption. A facility that is not entitled to a categorical exemption pursuant to Rule 62-210.300(3)(a), F.A.C., shall be exempt from the permitting requirements of this chapter, Chapters 62-212 and 62-213, F.A.C., and Chapter 62-4, F.A.C., if all of the emissions units and activities within the facility, including any proposed new emissions units and activities, meet the exemption criteria of Rule 62-210.300(3)(a), F.A.C., or Rule 62-210.300(3)(b)1., F.A.C., or if the facility meets all of the following criteria:

a. No emissions unit or pollutant-emitting activity within the facility would be subject to any unit-specific applicable requirement.

b. The facility would neither emit nor have the potential to emit:

(i) 1,000 pounds per year or more of lead and lead compounds expressed as lead;

(ii) 1.0 ton per year or more of any hazardous air pollutant;

* 62-210.300(3)(b)

- (iii) 2.5 tons per year or more of total hazardous air pollutants;
- (iv) 25 tons per year or more of carbon monoxide, nitrogen oxides and sulfur dioxide; or
- (v) 10 tons per year or more of any other regulated pollutant.

c. The facility would neither emit nor have the potential to emit any pollutant in such amount as to make the facility a Title V source, nor would the facility be a Title V source for any other reason.

3. Temporary Exemption for Emissions Units at Certain Title V Sources. Except for an emissions unit that is subject to any applicable regulation or permitting requirement under Rule 62-212.400 or 62-212.500, F.A.C.; any emissions standard or other requirement adopted by reference prior to July 1, 1995, in Rule 62-204.800, F.A.C.; any requirement established pursuant to Rule 62-296.330, F.A.C.; or any Reasonably Available Control Technology (RACT) provisions under Rules 62-296.500 through 62-296.712, F.A.C.; an emissions unit that is described in a timely and complete permit application under Chapter 62-213, F.A.C., and not subject to an existing valid air permit, shall be exempt from the permitting requirements of this chapter, Chapter 62-4 and Rule 62-212.300, F.A.C., until a final determination on a permit application under Chapter 62-213, F.A.C., is made. In addition, no emissions unit shall be exempt under this paragraph if its emissions cause or contribute to a significant net emissions increase under Rule 62-212.400 or 62-212.500, F.A.C., which would trigger preconstruction review, or if it is constructed or modified, as defined under Rule 62-210.200, F.A.C., subsequent to November 23, 1994. Any applicant exercising this exemption shall provide notification of such exemption to the Department, and further authorizes the Department to inspect these emissions units at the Department's discretion. Emissions units subject to existing valid permits shall continue to operate consistent with those permits as provided under Rule 62-213.420(1)(b)2., F.A.C. This exemption is available only to emissions units contained within either facilities that were Title V sources on or before October 25, 1995, and that commenced operation on or before that date, or facilities that became Title V sources by operation of law after October 25, 1995, and have timely applied for an initial Title V air operation permit.

4. Temporary Phosphogypsum Exemption. Until permitted pursuant to Chapter 62-213, F.A.C., phosphogypsum disposal areas are exempt from the requirement to obtain an air operation permit.

(c) Conditional Exemptions From Title V Air Permitting. The following facilities are exempt from the requirement to obtain a Title V air operation permit under the provisions of Chapter 62-213, F.A.C., but are not exempt from the requirement to obtain any other air permit as may be required under this rule unless also exempt from permitting under Rule 62-210.300(3)(a) or (b), F.A.C., or Rule 62-4.040, F.A.C. A facility is not entitled to an exemption from Title V permitting under this rule if it is a Title V source pursuant to paragraph (f), (g), or (h) of the definition of "major source of air pollution" or the facility would be classified as a Title V source as a result of the combined potential to emit regulated pollutants of all emissions units at the facility.

1. Asphalt concrete plants, provided the following conditions are met:

a. The production rate of asphaltic concrete shall not exceed 500,000 tons in any consecutive twelve-month period.

b. Fuel oil consumption shall not exceed 1.2 million gallons in any consecutive twelve-month period.

c. Fuel oil shall not exceed 1.0 percent sulfur content, by weight. The owner shall maintain records to demonstrate that each shipment of fuel oil has 1.0 percent or less sulfur and that the sulfur content was determined by ASTM methods ASTM D4057-88 and ASTM D129-91, ASTM D2622-94 or ASTM D4294-90, adopted and incorporated by reference in Rule 62-297.440(1).

d. Particulate matter (PM) emissions shall not exceed 0.04 grains per dry standard cubic foot averaged over a three-hour period, if the facility is subject to 40 C.F.R. 60.90, Subpart I. If the facility is not subject to Subpart I, it shall not exceed the applicable particulate emission limiting standard pursuant to Rule 62-296.320(4)(a), F.A.C., and its hours of operation shall not exceed 4,000 hours in any consecutive twelve-month period.

e. Fugitive PM emissions shall be controlled in accordance with the requirements of Rule 62-296.320(4)(c), F.A.C.

f. Visible emissions (VE) shall not be equal to or greater than 20 percent opacity.

g. The owner or operator shall maintain records to document the monthly and the twelve-month rolling totals of tons of asphaltic concrete produced, the gallons of fuel oil consumed, and the hours of operation. Such records shall be retained for five years.

h. The owner or operator shall submit an Annual Operating Report for Air Pollutant Emitting Facility (DEP Form No. 62-210.900(5)) to the Department annually pursuant to Rule 62-210.370(3), F.A.C.

i. The owner or operator shall submit a stack test using EPA Reference Method 5 or 5A and a visible emission (VE) test using EPA Reference Method 9, incorporated and adopted by reference in Chapter 62-297, F.A.C., that demonstrate compliance with the applicable PM and VE standards, respectively, to the Department by March 15, 1996, and annually thereafter during each federal fiscal year (October 1-September 30). The initial tests shall have been conducted between March 16, 1995 and March 15, 1996.

j. The owner or operator of any asphalt plant in operation as of January 1, 1996, shall notify the appropriate permitting authority, with a copy to the Division of Air Resources Management, in writing, not later than March 15, 1996. Such notification shall include a statement that the facility is operating in compliance with the provisions of Rule 62-210.300(3)(c)1., F.A.C., and that the facility agrees to continue to operate in compliance with these provisions. If such facility has a valid air operation permit, the permit will be updated by the Department to incorporate the requirements of Rule 62-210.300(3)(c)1.a. through i., F.A.C. If such facility does not have a valid air operation permit, the facility shall apply to the Department for an air operation permit not later than March 15, 1996.

k. The owner or operator of any asphalt plant which commences operation after January 1, 1996, must request that the requirements of Rule 62-210.300(3)(c)1.a. through i., F.A.C., be incorporated into the facility's air operation permit.



March 21, 2001

RECEIVED
MAR 23 2001

Department of Environmental Protection
SOUTHWEST DISTRICT
BY _____

Stanley Tam
Florida Department of Environmental Protection
Southwest District
3804 Coconut Palm Drive
Tampa, FL 33619

Dear Stanley,

Please find enclosed additional QA/QC data, as requested.
Split samples of batch numbers 1432, 1438, 1444 and 1454 were submitted to Precision Petroleum Laboratories for analysis of all on-specification parameters.
All available QA/QC data from Precision Petroleum Laboratories concerning these and other batches, were submitted to the Department on March 1, 2001.

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

Sincerely,

Richard Dillen.

Cc: File



March 1, 2001

Stanley Tam
Florida Department of Environmental Protection
Southwest District
3804 Coconut Palm Drive
Tampa, FL 33619

Dear Stanley,

Please find enclosed the raw data reflecting the statistical data collection of the processed used oil fuel, starting with Batch #1427, collected on 08/22/00 and ending with Batch #1463, collected on 11/21/00.

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

Sincerely,

A handwritten signature in black ink, appearing to read 'Richard Dillen', is written over a light blue horizontal line.

Richard Dillen.

Cc: File

D.E.P.
MAR 05 2001
Southwest District Tampa

DATA FILED ON
BOOK SHELF

FILE: 3-f
5/01

Fax

Name: Al Gephart
Organization: F.D.E.P.
Fax: 813-744-6125
Phone: 813-744-6100, ext.372
From: Richard Dillen, HOWCO
Date: December 12, 2000
Subject: Updated statistical data
Pages: 3, including cover sheet

12/12/00 REVISION

FILE: 3-f
4/00

HOWCO Environmental Services
STATISTICAL DATA ANALYSIS on Processed Oil

November 22, 2000

August 22, 2000 through

Period:

Asbestos in ppm Cadmium in ppm Chromium in ppm Lead in ppm PCB's in ppm PCP's in ppm Flakpdr in dag. F

Date	Batch #	Asbestos in ppm	Cadmium in ppm	Chromium in ppm	Lead in ppm	PCB's in ppm	PCP's in ppm	Flakpdr in dag. F
08/22/00	1427	1.0	0.5	0.7	24	880	0.5	165
08/24/00	1428	1.0	0.2	0.2	33	873	0.5	200
08/26/00	1429	1.0	0.1	1.0	24	877	0.5	200
08/28/00	1430	1.0	0.1	0.9	24	872	0.5	185
08/30/00	1431	1.0	0.2	0.8	36	889	0.5	180
08/01/00	1432	1.0	0.1	0.8	33	791	0.5	160
08/03/00	1433	1.0	0.3	1.9	40	802	0.5	175
08/07/00	1434	1.0	0.3	1.9	36	729	0.5	175
08/11/00	1435	1.0	0.3	2.5	45	783	0.5	120
08/13/00	1436	1.0	0.2	1.7	37	827	0.5	117
08/13/00	1437	1.0	0.1	1.3	32	841	0.5	140
08/15/00	1438	1.0	0.2	2.0	36	890	0.5	135
08/19/00	1439	1.0	0.3	2.0	51	773	0.5	170
08/21/00	1440	1.0	0.2	1.8	28	883	0.5	165
08/23/00	1441	1.0	0.2	1.5	27	720	0.5	175
08/25/00	1442	1.0	0.2	1.4	26	726	0.5	165
08/28/00	1443	1.0	0.2	1.3	28	748	0.5	180
10/02/00	1444	1.0	0.2	1.9	31	821	0.5	230
10/04/00	1445	1.0	0.2	1.4	29	786	0.5	145
10/08/00	1446	1.0	0.2	1.3	28	878	0.5	120
10/09/00	1447	1.0	0.2	1.3	28	883	0.5	125
10/11/00	1448	1.0	0.2	2.0	27	873	0.5	115
10/12/00	1449	1.0	0.2	2.0	28	820	0.5	140
10/16/00	1450	1.0	0.2	2.0	26	845	0.5	160
10/18/00	1451	1.0	0.1	1.7	25	831	0.5	155
10/20/00	1452	1.0	0.2	1.7	29	848	0.5	175
10/23/00	1453	1.0	0.3	1.1	25	837	0.5	200
10/25/00	1454	1.0	0.2	0.9	26	918	0.5	200
10/27/00	1455	1.0	0.2	1.1	30	890	0.5	170
10/31/00	1456	1.0	0.2	1.2	42	757	0.5	170
11/02/00	1457	1.0	0.2	1.7	48	839	0.5	155
11/02/00	1458	1.0	0.2	1.7	33	831	0.5	200
11/07/00	1459	1.0	0.2	1.8	36	887	0.5	165
11/13/00	1460	1.0	0.1	1.7	26	908	0.5	145
11/18/00	1461	1.0	0.1	1.5	36	966	0.5	160
11/18/00	1462	1.0	0.2	2.0	27	927	0.5	120
11/21/00	1463	1.0	0.2	1.3	24	973	0.5	110

of Samples (n)

Mean

Std. Dev. (n-1)

Reg. Limit

Student's t-value

Notes: For Asbestos and PCB's, the t-value is calculated using a Std. Dev. equal to one half (1/2) of the Detectable Limit (1.0 and 0.5 respectively).

37	0.2	1.5	32	835.2	0.5	160
1.0	0.078	0.478	7.104	80.586	0.000	28.208
0.000	2	10	100	1000	2	100
5	-143.233	-109.280	-58.588	-12.442	-36.497	-13.038
-43.852						

RESULTS OF 'SPLIT' SAMPLES, ANALYZED BY PRECISION PETROLEUM LABS., INC.

Batch #	Arsenic in ppm	Cadmium in ppm	Chromium in ppm	Lead in ppm	Total Halogens in ppm	PCB's in ppm	Flashpoint in deg. F
1432	< 1.0	< 1.0	< 1.0	29.66	312.8	< 0.5	210
1438	< 1.0	< 1.0	< 1.0	31.41	670.1	< 0.5	> 230
1444	< 1.0	< 1.0	< 1.0	28.31	402.6	< 0.5	> 230
1454	< 1.0	< 1.0	< 1.0	24.12	314.6	< 0.6	192

Fax

Name: Stanley Tam
Organization: F.D.E.P., Haz. Waste Section
Fax: 813-744-6084
Phone: 813-744-6100, xt.390
From: Richard Dillen
Date: December 1, 2000
Subject: Result of Statistical Data Study
Pages: 2, including cover sheet

Dear Stanley,

Please find attached a print-out of the Statistical Data Study.

It is our sincere belief that HOWCO complied with the requirements, specified in Specific Condition II.8.a through II.8.c.

The calculated Student's t-value, for all seven parameters, are below the tabulated t-value from Table 9-2 of SW-846. Based on these findings, HOWCO will switch to a sample frequency of one sample per every two weeks.

As per our conversation on November 22nd, the Student's t-value was calculated as follows:

$$t = \bar{x} - \mu_{\text{reg}} / (s / \sqrt{n})$$

Where, $\bar{x}$, is the mean result of all samples for one parameter,

μ_{reg} is the Regulatory threshold for that parameter,

s , is the sample standard deviation based on $(n-1)$ and

$\sqrt{n}$, is the square root of the amount of samples.

A complete report will be submitted to the Department as soon as possible.

If you have any questions, please do not hesitate to contact me at 727-328-7403, xt. 347.

cc: Tim Hagan, President/CEO
Laurel Lockett, Attorney at Carlton Fields

FILE: 3-f
3/00

HOWCO Environmental Services
STATISTICAL DATA ANALYSIS on Processed Oil

Batch #	Arsenic In ppm	Cadmium In ppm	Chromium In ppm	Lead In ppm	Total Hydrogens In ppm	PCB's In ppm	Flashpoint In deg. F
1427	1.0	0.5	0.7	24	880	0.5	165
1428	1.0	0.2	0.2	33	873	0.6	200
1429	1.0	0.1	1.0	24	877	0.5	200
1430	1.0	0.1	0.9	24	872	0.5	185
1431	1.0	0.2	0.8	38	858	0.5	160
1432	1.0	0.1	0.8	33	791	0.5	160
1433	1.0	0.3	1.9	40	802	0.5	175
1434	1.0	0.3	1.9	38	729	0.5	175
1435	1.0	0.3	2.5	46	753	0.5	120
1436	1.0	0.2	1.7	37	827	0.5	117
1437	1.0	0.1	1.3	32	841	0.5	140
1438	1.0	0.2	2.0	38	890	0.5	155
1439	1.0	0.3	2.0	51	773	0.5	170
1440	1.0	0.2	1.5	28	683	0.5	165
1441	1.0	0.2	1.5	27	720	0.5	175
1442	1.0	0.2	1.4	26	728	0.5	165
1443	1.0	0.2	1.3	26	748	0.5	160
1444	1.0	0.2	1.6	31	821	0.5	230
1445	1.0	0.2	1.4	29	796	0.5	145
1446	1.0	0.2	1.3	28	976	0.5	120
1447	1.0	0.2	1.3	28	853	0.5	125
1448	1.0	0.2	2.0	27	873	0.5	115
1449	1.0	0.2	2.0	28	820	0.5	140
1450	1.0	0.2	2.0	26	845	0.5	160
1451	1.0	0.1	1.7	25	831	0.5	155
1452	1.0	0.2	1.7	29	846	0.5	175
1453	1.0	0.3	1.1	25	837	0.5	200
1454	1.0	0.2	0.9	28	818	0.5	200
1455	1.0	0.2	1.1	30	890	0.5	170
1456	1.0	0.2	1.2	42	757	0.5	170
1457	1.0	0.2	1.7	48	838	0.5	155
1458	1.0	0.2	1.7	33	831	0.5	200
1459	1.0	0.2	1.9	39	897	0.5	165
1460	1.0	0.1	1.7	28	906	0.5	145
1461	1.0	0.1	1.5	38	868	0.5	160
1462	1.0	0.2	2.0	27	827	0.5	120
1463	1.0	0.2	1.3	24	873	0.5	110

of Samples (n)

Mean

Std. Dev. (n-1)

Reg. Limit

Student's t-value

Note: For Arsenic and PCB's, the t-value is calculated using a Std. Dev. equal to one half (1/2) of the Detectable Limit (1.0 and 0.8 respectively).

37
1.0
0.000
5
-48.662
-47.313
-129.005
-8542.088
-8.709
-38.497
-5.865



Department of Environmental Protection

Jeb Bush
Governor

Southwest District
3804 Coconut Palm Drive
Tampa, Florida 33619

David B. Struhs
Secretary

Mr. Arthur N. Anderson, Vice President
HOWCO Environmental Services
3701 Central Ave
St. Petersburg, Fl. 33713

October 17, 2000

RE: HOWCO Solid Waste Processing Facility
Financial Assurance Cost Estimates
Permit No.: 92465-HO06-001, Pinellas County

Dear Mr. Hagan:

This letter is to acknowledge receipt of your letter dated October 6, 2000 (received October 11, 2000) concerning the funding for your financial assurance mechanism. The Department does not approve your request for an extension of 30 days to finalize and bind the coverage for the following reasons:

1. Specific Condition IV.12.b. clearly requires that within sixty (60) days of issuance of this permit, the owner or operator shall submit initial proof of financial assurance issued in favor of the State of Florida **and/or authorized, delegated local program**, on appropriate forms, in the amount of \$58,760. Your request for an extension of time was received **after** October 1, 2000 (60 days after permit issuance). This indicates that you were out of compliance with the conditions of your permit when the request was made. The Department does not view such requests for extensions favorably when the compliance date has passed.
2. Specific Condition IV.12.b. further specifies that one copy of the information should be sent to Financial Assurance Coordinator, Pinellas County Solid Waste Department, 3095 114th Ave South, St. Petersburg, Fl. 33716 and one (1) copy shall be sent to: Financial Assurance Coordinator, Solid Waste Section, Department of Environmental Protection, 2600 Blair Stone Road, MS#4565, Tallahassee, Fl. 32399-2400. It is the Department's understanding that this initial proof has not been submitted and approved by Pinellas County or the Department's Tallahassee office.
3. The permit application was submitted October 28, 1999 and issued August 3, 2000. Throughout this extended permit application process, the permittee was aware of the requirements for financial assurance. The cost estimates were approved by the Department on November 29, 1999 (attached) and the applicant was directed on December 6, 1999 (attached) to contact Pinellas County to establish the required financial assurance funding.

The Department has been agreeable to assisting you in understanding and complying with Department rules and your permit. However, the Department believes that 11 months is an ample timeframe to establish the required financial assurance funding. Therefore your request for a 30 day extension is not approved. Please be reminded that the Department may initiate enforcement actions to ensure compliance with Department rules and the conditions of your permit. If you have any questions, you may contact me at (813) 744-6100 ext. 386.

Sincerely,


Susan J. Pelz, P.E.
Solid Waste Section
Southwest District

sjp
Attachments

cc: Tim Hagan, HOWCO, 3701 Central Ave., St. Petersburg, Fl. 33713
Deb Bush, Pinellas County Solid Waste, 3095 114th Ave North, St. Petersburg, Fl. 33716
Fred Wick, FDEP, Tallahassee, w/attachment
Robert Butera, P.E., FDEP Tampa
Roger Evans, FDEP Tampa-RCRA

"More Protection, Less Process"

Printed on recycled paper.

File 3-f

2/00



Jeb Bush
Governor

Department of Environmental Protection

Southwest District
3804 Coconut Palm Drive
Tampa, Florida 33619

David B. Struhs
Secretary

Mr. Tim Hagan, President
HOWCO Environmental Services
3701 Central Ave
St. Petersburg, Fl. 33713

December 6, 1999

RE: HOWCO Solid Waste Processing Facility Financial Assurance Cost Estimates
Pending Permit No.: 92465-HO06-001, Pinellas County

Dear Mr. Hagan:

This letter is to notify you that the Department has entered into a Financial Assurance Agreement ("Agreement") with Pinellas County. The Agreement was executed by the Secretary of the Department on March 3, 1998. The Agreement eliminates the need for duplicate financial instruments for compliance with the financial assurance requirements of Rules 62-701.700 and 62-701.630, Florida Administrative Code, and Section 106-159, Pinellas County Code. A copy of the Agreement is available upon request.

Please submit documentation which demonstrates that the financial assurance mechanism has been established and adequately funded directly to Pinellas County. The 1999-approved closing cost estimate is \$58,760 (see letter dated November 29, 1999 sent under separate cover). Please contact Ms. Deb Bush at (727) 464-7565 to obtain the required forms. If you have any questions, you may contact me at (813) 744-6100 x 386, or Deb Bush at (813) 464-7565.

Sincerely,

Susan J. Pelz, P.E.
Solid Waste Section
Southwest District

sjp

cc: Timothy Rudolph, P.E., Enviroengineering, Inc., 109 Azalea Point Drive South,
Ponte Vedra Beach, Fl. 32082
Deb Bush, Pinellas County Solid Waste, 3095 114th Ave North, St. Petersburg, Fl. 33716
Fred Wick, FDEP, Tallahassee
Robert Butera, P.E., FDEP Tampa
Roger Evans, FDEP Tampa-RCRA

"Protect, Conserve and Manage Florida's Environment and Natural Resources"

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Jeb Bush
Governor

Department of Environmental Protection

Southwest District
3804 Coconut Palm Drive
Tampa, Florida 33619

David B. Struhs
Secretary

Mr. Tim Hagan, President
HOWCO Environmental Services
3701 Central Ave
St. Petersburg, Fl. 33713

November 29, 1999

RE: HOWCO Solid Waste Processing Facility Financial Assurance Cost Estimates
Pending Permit No.: 92465-HO06-001, Pinellas County

Dear Mr. Hagan:

This letter is to acknowledge receipt of the cost estimates dated October 25, 1999 (received October 27, 1999), for closure of the HOWCO Solid Waste processing Facility. The cost estimates received October 27, 1999 (\$58,760 total closing), are **APPROVED** for 1999. The next annual update is due no later than October 27, 2000.

A copy of these approved estimates will be forwarded to Mr. Fred Wick, Solid Waste Section, FDEP, 2600 Blair Stone Road, Tallahassee, Florida 32399-2407. Please work with him directly to assess the facility's compliance with the funding mechanism requirements of Rule 62-701.630, F.A.C. If you have any questions, you may contact me at (813) 744-6100 ext. 386.

Sincerely,

Susan J. Pelz, P.E.
Solid Waste Section
Southwest District

sjp

cc: Timothy Rudolph, P.E., Environeering, Inc., 109 Azalea Point Drive South,
Ponte Vedra Beach, Fl. 32082
Deb Bush, Pinellas County Solid Waste, 3095 114th Ave North, St. Petersburg, Fl. 33716
Fred Wick, FDEP, Tallahassee, w/attachment
Robert Butera, P.E., FDEP Tampa
Roger Evans, FDEP Tampa-RCRA

HOWCO Environmental Services

RESOURCE RECOVERY & EMERGENCY RESPONSE

OCT 11 2000

October 6, 2000

Ms. Susan Pelz, PE1
Florida Department of Environmental Protection
3804 Coconut Palm Drive
Tampa, Florida 33619

CERTIFIED MAIL # 7099 3400 0004
2002 0367

Dear Ms. Pelz:

On August 03, 2000 HOWCO Environmental was issued an Operation of a Used Oil and Material Processing Facility permit (92465-HO06-001).

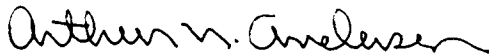
HOWCO is currently in the process of procuring a solid waste surety bond as required by the permitting regulations. We have submitted several bond applications through our insurance agent, and are waiting for our agent to finalize coverage.

It is my understanding the surety bond should be in place within 60 days from the permit date (08/03/2000). Since our bond coverage is still in procurement, we would like to request an additional 30 days to finalize and bind the coverage.

Since this is a regulatory matter, your written response to this request would be greatly appreciated.

Please do not hesitate to contact me should you have any questions.

Respectfully,



Arthur N. Anderson
Executive VP/CFO

cc:

Tim Hagan
President/CEO