

ATTACHMENT 1

DESCRIPTION OF FACILITY OPERATIONS

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

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

OIL RECOVERY

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

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

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

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

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

SOLIDS

The solids processed are generated from the following:

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

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

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

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

Solidification agents may be added to enhance the process.

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

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

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

ATTACHMENT 2 DETAILED PROCESS DESCRIPTION

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

Collection Process

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

Receiving Shipments

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

Used oil testing

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

Used oil unloading

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

Used Oil Processing

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

1. Distillation and/or Chemical Separation Process

Oil is processed utilizing the following equipment:

Tank # 100 & 101
Heat exchanger
Vibrating mesh screen
Thermal oil heater

Storage tanks
Various pumps, piping, valves, strainers
and filter

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

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

Oil Storage Tanks

Refer to Tables 1, 2 & 3.

Removal and disposal of oily solids from used oil process

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

Used oil reprocessing

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

Processed oil shipment and identification

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

Used oil transportation

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

Waste Antifreeze

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

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

Used Oil Filters

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

Table 1
Processing Tanks - Containment #1A

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

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

Table 2
Processing Tanks - Containment 1B

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

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

Containment area 2 has no tanks.

Table 3
Containment Area #5

Tank Number	Capacity (gallons)	Product
108	9980	IWPP Sludge
109	3225	Used Oil
110	6415	Oily Solids
111	19380	Oily Solids

Secondary Containment Calculations
Howco-St. Petersburg



I, Containment Area 1 A

1. Outside containment wall-enclosed area (refer to Drawing D-4-1)

$$\begin{aligned}\text{Area} &= 50 \text{ feet} \times 35 \text{ feet} = 1,750 \text{ square feet} \\ &+ 14 \text{ feet} \times 35 \text{ feet} = 490 \text{ square feet} \\ &+ 70 \text{ feet} \times 44 \text{ feet} = 3,080 \text{ square feet}\end{aligned}$$

$$\text{Subtotal} = 5,320 \text{ square feet}$$

2. Less area occupied by tank bases and vertical tanks

Tanks 130 – 137 concrete saddles

$$\begin{aligned}\text{Area} &= 8 \text{ tanks} \times 3 \text{ saddles} \times 0.66 \text{ feet wide} \times (8 + 21.3 + 8 + 10 + 10) \\ &\text{combined length} = 907 \text{ square feet}\end{aligned}$$

Tanks 100- 101 concrete saddles

$$\text{Area} = 4 \text{ saddles} \times 1.5 \text{ feet wide} \times 15 \text{ feet long} = 90 \text{ square feet}$$

$$\text{Tank 170} - 10.5 \text{ feet diameter} = 86.5 \text{ square feet}$$

$$\text{Subtotal} = 1083.5 \text{ square feet}$$

$$\text{Net Area of 1A} = 5320 - 1083.5 = 4,236.5 \text{ square feet}$$

$$\begin{aligned}\text{Volume of Area 1A} &= 4236.5 \text{ square feet} \times 2 \text{ feet high} = 8472 \text{ cubic feet} \\ &= 63,370 \text{ gallons}\end{aligned}$$

II. Containment Area 1B

1. Outside containment wall

$$\begin{aligned}\text{Area} &= 38 \times 80 = 3040 \text{ square feet} \\ &+ 3 \times 14 = 52 \text{ square feet} \\ &+ 5 \times 6 = 30 \text{ square feet} \\ \text{Subtotal} &= 3122 \text{ square feet}\end{aligned}$$

2. Less area occupied by tanks

$$\begin{aligned}120 &= 84 \text{ square feet} \\ 121 &= 113 \text{ square feet} \\ 122 &= 113 \text{ square feet} \\ 123 &= 113 \text{ square feet} \\ 124 &= 113 \text{ square feet} \\ 125 &= 71 \text{ square feet} \\ 126 &= 90 \text{ square feet} \\ 127 &= 87 \text{ square feet} \\ 128R1 &= 87 \text{ square feet} \\ \text{Subtotal} &= 871 \text{ square feet}\end{aligned}$$

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Net Area of 1B = $3122 - 871 = 2251$ square feet

Volume of 1B = $2251 \times 2.25 = 5064$ cubic feet = 37,884 gallons

Total Containment Volume of 1A + 1B = 101,254 gallons

III. Containment Area 3

1. Secondary containment area = 88 feet x 32 feet = 2,816 square feet

2. Less area of tanks

151 = 78.5 square feet

152 = 113 square feet

153 = 177 square feet

154 = 78.5 square feet

155 = 78.5 square feet

160 = 78.5 square feet

161 = 78.5 square feet

162 = 78.5 square feet

163 = 78.5 square feet

164 = 78.5 square feet

165 = 78.5 square feet

Subtotal = 996.5 square feet

Net Area of Containment Area 3 = $2,816 - 997 = 1,819$ square feet

Volume = $1,819 \times 4.25$ feet high = 7,730 cubic feet = 57,826 gallons

IV. Containment Area 4

1. Secondary containment area = 88 feet x 30 feet = 2,640 square feet

2. Less area of tanks

166 = 92 square feet

191 = 78.5 square feet

192 = 78.5 square feet

Subtotal = 249 square feet

Net Area of Containment Area 4 = $2,640 - 249 = 2,391$ square feet

Volume = $2,391 \times 4.25$ feet high = 10,162 cubic feet = 76,010 gallons



V. **Containment Area 5**

1. Secondary containment area = 43 feet x 38 feet = 1,634 square feet
2. Less area of tanks
 - 108 - 10 feet diameter = 78.5 square feet
 - 109 - 6.5 feet diameter = 33.2 square feet
 - 110 - elevated cone, so volume occupied is only steel base = 20 square feet
 - 111 - horizontal tank- bases = 3 saddles x 0.66 feet x 10 feet = 19.8 sq. feet

Subtotal of area = 151.5 square feet

Net area of Containment Area 5 = 1634 - 151.5 = 1482.5 square feet

Containment volume = 1482.5 x 3 = 4447.5 cubic feet = 33,890 gallons



John Jones

**Summary of Secondary Containment Calculations
Howco-St. Petersburg**

Area	Containment Volume (gallons)	Largest tank (gallons)	110% of largest tank (gallons)
1	101,254	T100- 30,300	33,000
2	Not applicable-No tanks in containment area		
3	57,826	T152-29,670	32,637
4	Not applicable-water treatment tanks only		
5	33,890	T111-19,380	21,318

JMS Jones

**ATTACHMENT 3
ANALYSIS PLAN**

USED OIL

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

1. Sampling

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

2. Testing

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

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

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

- (a) The Permittee shall sample and test each incoming shipment for total halogens. If the total halogen content is 999 ppm or less, the load will be accepted into the plant.
- (b) If the test results indicate a total halogen content greater than or equal to 1000 ppm, separate samples will be obtained from each compartment. The separate samples will be tested in an attempt to isolate the compartment with excessive levels of total halogens. The test results will be stapled and documented on the receiving report for that vehicle.

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

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

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

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

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

CERTIFICATION OF PROCESSED OIL

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

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

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

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

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

INCOMING OILY SOLID WASTES

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

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

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

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

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

ATTACHMENT 4 SOLID WASTE HANDLING

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

Removal of oily solids from used oil processing

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

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

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

A representative sample will be taken annually by a plant technician or chemist. Each sample will be collected in an 8 ounce jar using a scoop. The properly preserved sample will be sent to an outside lab to be analyzed for the full Toxicity Characteristic Leaching Procedure (TCLP) test for metals, volatiles, semi-volatiles, herbicides and pesticides using EPA Test Method 1311 in accordance with SW-846. This analysis will be used to provide the base information for "Generator Product Knowledge".

Non-Hazardous and Petroleum Contaminated Solids From Customers

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

Receiving and Processing of Oily Solids

Oily solids arriving in drums will be offloaded on a coated concrete pad prior to processing. The solids from the drums may be bulked in roll-off containers or dump trailer where oil and oily

liquids may be removed for recycling or further processing. Solidification agents may be added to these containers prior to off-site shipment to a permitted thermal unit or landfill.

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

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

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

Design Requirements

The facility does not have any tipping, processing, sorting, storage or compaction areas that are enclosed. The entire facility is equipped with a fence that is used as a litter control device.

The facility has containment and sloped drainage that prevents stormwater from leaving the property. The facility is designed with secondary containment for the regulated tanks that contain petroleum. The yard area is sloped with a drainage trench with a low collection point. Stormwater is not allowed to be discharged off the property, unless it has been collected and properly pretreated for discharge to a permitted Publicly Owned Treatment Facility (POTF). Howco has a permitted industrial wastewater pretreatment facility onsite. The solid waste that Howco processes does not come into contact with stormwater. The solid waste does not generate leachate, since the facility is a Materials Recovery Facility. The facility was designed to minimize standing water accumulation. The facility is appropriately designed to hold the permitted amount of solid waste for processing until the waste is transferred for disposal or recycling. An oil water separator is located at the south end of the facility. Rainwater that is not contaminated and does not have an oily sheen is discharged through the oil water separator after the rainfall event.

Operational Requirements

Recyclable materials are currently managed at the Howco facility. The facility does not store non-processable or residue materials. Non-Processable wastes are not received by the facility and have not been received in the past five years. The materials received by the facility are stored, processed and shipped to a permitted treatment, storage or disposal facility. Residues are not received by and are not generated by the facility and are not stored on site.

Financial Assurance

The required financial assurance is provided as enclosure (1).

Stormwater

Stormwater coming in contact with used oil or solid waste processing areas including the tank farm, the associated secondary containment, sludge press and the oil water separator is visually inspected before it is allowed to flow off site. If any visible contamination is present, the stormwater is contained and treated in the onsite permitted Industrial Wastewater Pretreatment Facility before discharge to a POTF. Stormwater does not discharge directly off site. The stormwater is contained on the property.

The St. Petersburg facility has applied for No Exposure Certification for Exclusion from NPDES Stormwater Permitting in April of 2010 to the Florida Department of Environmental Management. A copy of the letter is provided as enclosure (2).

Record Keeping

Howco shall maintain operational records on-site to include a daily log of the quantity of solid waste received, processed, stored and removed from the site for recycling or disposal. The country of origin for the waste will be recorded, if known. These records shall include each type of solid waste, recovered materials, residuals and unacceptable waste which is processed, recycled and disposed. Such records shall be compiled on a monthly basis and shall be available for inspection by the Department. Records shall be retained at the facility for at least three years. No construction or demolition debris is accepted at the facility.

Enforcement History

A data base compliance search was done on the FDEP website and no solid waste enforcement actions were found going back as far as records were available. The first inspection obtained by the data base search was in 1999 and there was no violations noted.

ATTACHMENT 5

TRACKING PLAN

Product Collection

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

Incoming Shipments

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

Outgoing shipments

A manifest/shipping document is completed for outgoing shipments. The document will contain the date, volume, name, address, EPA ID number of the transporter and driver's name. The document will also contain the name, address and EPA ID number of the receiving burner or receiving entity.

ATTACHMENT 6

EMERGENCY PREPAREDNESS, PREVENTION & CONTINGENCY PLAN

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1.0 INTRODUCTION

1.1 Purpose

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

1.2 Areas of Concern:

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

1.3 Responsibilities

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

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

2.0 GENERAL INFORMATION

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

Facility Activities: The facility is a used oil processing facility that can operate 24 hours per day, 7 days per week. Used oil, oil filters, antifreeze and petroleum contaminated water are

collected from various clients. The materials are delivered to the facility and tested. Based on the test results, the materials are transferred into holding tanks, processed, and then shipped to suppliers and/or disposal/recycling facilities.

3.0 SPILL PREVENTION AND EMERGENCY PREPAREDNESS

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

General Spill Prevention Measures

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

Material Transport and Transfer

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

Prevention and Protective Measures

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

Emergency Equipment Available (see site plan for locations)

The following spill response equipment will be maintained on site. Items used during a spill will be cleaned and decontaminated. Items consumed during a spill response will be replaced after the spill. The emergency response equipment will be inspected one per month.

Supplies:	Absorbent booms	5 bales
	Absorbent pads	5 bales
	Absorbent granular	10 bags
	Flashlights	5 each

Equipment:	Push Brooms	3 each
	Shovels	4 each
	55-gallon container	2 each
	Rakes	2 each

Personal		
Protection:	Tyvek suits	5 each
	Gloves	5 each
	Safety glasses	5 each
	Rain gear	5 each

Training

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

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

Spill Abatement Activities

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

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

- Do not risk human life or health in an attempt to control a spill
- Shut off pumps and close the lines serving a leaking container or tank
- Shut off electricity to the affected area, if necessary
- Mobilize emergency response personnel

- Normal working hours – the plan will be activated by use of an electronic loudspeaker
- Off-shift hours – control team personnel will be notified by telephone or pager
- Contain the spill as close to its source as possible
- Assemble required clean-up equipment and order clean-up
- In addition to the PIC, operating personnel will, under the direction of the PIC, position the absorbent materials in strategic points to contain the spill as needed.
- Response team members will operate pumps and man hoses to further contain and capture the spill
- Team members will perform other assigned tasks needed as directed by the PIC

4.0 EMERGENCY COORDINATOR (PIC) INFORMATION

Duties of the Emergency Coordinator or Designee

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

The following identifies the primary and alternate emergency coordinators:

Recycling Facility Primary Emergency Coordinator (Primary PIC)

David Roehm

9487 123rd Way North

Seminole, FL 33772

Cell Phone # 727-385-1508 Work Phone # 727-327-8467 (24) Hour 1-800-435-8467

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

Recycling Facility Secondary Emergency Coordinator (Secondary PIC)

Lee Morris

2571 46th Terrace North

St. Petersburg, FL 33714

Cell Phone # 727-543-5429 Work Phone # 727-327-8467 (24) Hour 1-800-435-8467

Or
Tim Hagan
7100Sunset Way, App. 1208W
St. Petersburg Beach, FL 33706
Cell Phone # 727-804-4446 Work Phone # 727-327-8467 (24) Hour 1-800-435-8467

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

5.0 ARRANGEMENTS WITH LOCAL AUTHORITIES

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

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

The following items will be completed by the PIC:

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

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

6.0 EMERGENCY PROCEDURES

6.1 Identifying Releases and Hazards

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

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

6.2 Notifications and Reporting

In the event of an imminent or actual emergency, the PIC or First Responder will immediately dial 911. The facility communication system includes a telephone, cellular phones, and an electronic loudspeaker. 40 CFR Table 302.3 will be consulted when any hazardous materials are spilled. If the hazard material that was released meets or exceeds the Reportable Quantity (RQ), the agencies below will be notified immediately:

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

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

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

- 1) If the PIC or First Responder's assessment indicates that evacuation of the local area may be advisable, the PIC or First Responder will immediately notify the local authorities identified above. Additional assistance from local authorities listed in Appendix B may be obtained, as deemed necessary by the PIC or First Responder. The PIC or First Responder will notify employees by use of a bull horn. The PIC or First Responder will be available to assist local authorities in deciding whether evacuation of the immediate area is needed.
- 2) The PIC or First Responder will report the following information:
 - a) Name and telephone number;
 - b) Name and address of facility;
 - c) Time and type of incident;
 - d) Name and quantity of material involved, to the extent known;
 - e) The possible hazards to human health and the environment.

6.3 Emergency Procedures

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

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

Emergency Communication System

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

Fire Control Systems

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

Site Control Systems

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

Maintenance and Testing

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

Equipment Handling Procedures

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

Removal of Oil/Water from Containment

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

1. Accumulated water is inspected for the presence of a sheen.
2. If a sheen is present, the water is considered to be contaminated and will be transferred into a storage tank.
3. The water is not considered contaminated; it may be discharged to grade.
4. The following records must be maintained for each discharge event:
 - a. Date
 - b. Time
 - c. Presence or absence of petroleum or sheen
 - d. Person removing the accumulation

Off-site Emergency Response Procedures - during transport

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

7.0 DECONTAMINATION

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

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

8.0 REPORTING

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

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

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

9.0 TANK CLOSURE PLAN

Aboveground storage tanks (ASTs) will be closed in accordance with AST System Closure Requirements in Chapter 62-761.800, F.A.C.

10.0 AMENDMENTS to CONTINGENCY PLAN

This plan will be revised, if necessary, whenever:

1. Applicable regulations or ordinances are revised;
2. The plan fails in an emergency;
3. The facility changes in a manner that materially increases the potential for fires, explosions, or the release of hazardous materials/waste, or changes the response necessary in an emergency;
4. The PICs change; or
5. The list of emergency equipment changes.

PHONE NUMBERS OF LOCAL AUTHORITIES AND AGENCIES

<u>Local Authority/Agency</u>	<u>Phone Number</u>	<u>Contact Period</u>
Any Emergency	911	
FL. Department of Environmental Protection		
Tallahassee (24 hour line)	800-320-0519	
Southwest District	813-632-7600	
National Response Center	800-424-8802	
CHEMTREC (Chemical Information)	800-424-9300	

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Division of Emergency Response	800-635-7179
Department of Community Affairs (DCA)	800-320-0519
Pinellas County Emergency Management	727-464-3800
Florida Marine Patrol	800-342-5367
Coast Guard	727-896-6187
St Petersburg Fire Department	727-893-7272
Department of Transportation	813-632-6859
FL. Highway Patrol	813-632-6859
OSHA	813-626-1177
Department of Environmental Management	
Division of Air Quality	727-464-4422
Bayfront Medical Center	727-893-6714
Bayfront Convenient Care	727-526-3627
Edward White Hospital	727-323-1111
Convenient Care (Company Doctor)	727-347-9719

ATTACHMENT 7 UNIT MANAGEMENT DESCRIPTION

Drums

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

Piping

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

Storage Tanks

Above ground storage tanks currently meet the requirements of Rules 62-762.511.

Storage tanks, process tanks and process equipment are periodically inspected in accordance with Rule 62-762.601. The inspection records maintained on-site. Tanks are labeled according to their contents.

Removal of oil/water from containment

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

Inspections

The facility shall be inspected once per month using the enclosed Monthly Inspection Form.

HOWCO Environmental Services - Monthly Tank System Visual Inspection Checklist

843 43rd Street South - ST. PETERSBURG, FLORIDA

YEAR:

GENERAL DESCRIPTION UST OR AST CAPACITY (GALLONS) TANK CONTENTS CHECKLIST ITEMS	JANUARY DATE	FEBRUARY DATE	MARCH DATE	APRIL DATE	MAY DATE	JUNE DATE	JULY DATE	AUGUST DATE	SEPTEMBER DATE	OCTOBER DATE	NOVEMBER DATE	DECEMBER DATE
<u>GENERAL</u>	Y/N or N/A	Y/N or N/A	Y/N or N/A	Y/N or N/A	Y/N or N/A	Y/N or N/A	Y/N or N/A	Y/N or N/A	Y/N or N/A	Y/N or N/A	Y/N or N/A	Y/N or N/A
1. Tank System Contingency Plan on site and at appropriate location?												
2. If tank certificate of registration is required to be posted, is certificate posted?												
3. Are tank system components properly painted or identified?												
4. Is the Tank 135 Alarm panel powered and not in Alarm or System Failure condition?												
5. Is tank system Spill Kit on site?												
6. Is tank system Spill kit properly stocked?												
7. Is Spill Kit readily available and in designated location?												
8. Access to fill components locked or otherwise secured?												
9. Is tank surface free of dents, pits, cracks, rust or other damage?												
10. Is tank piping free of dents, pits, cracks, rust or other damage?												
11. No evidence of leakage around piping flanges, elbows and other fittings?												
12. Are piping sumps clear and unobstructed?												
13. Are Manway area free of product and other debris?												
14. Is secondary containment structure intact with drain valves closed?												
COMMENTS:												

HOWCO Environmental Services - Monthly Tank System Visual Inspection Checklist

843 43rd Street South - ST. PETERSBURG, FLORIDA

YEAR:

GENERAL DESCRIPTION UST OR AST CAPACITY (GALLONS) TANK CONTENTS CHECKLIST ITEMS	JANUARY DATE	FEBRUARY DATE	MARCH DATE	APRIL DATE	MAY DATE	JUNE DATE	JULY DATE	AUGUST DATE	SEPTEMBER DATE	OCTOBER DATE	NOVEMBER DATE	DECEMBER DATE
GENERAL	Y/N or N/A	Y/N or N/A	Y/N or N/A	Y/N or N/A	Y/N or N/A	Y/N or N/A	Y/N or N/A	Y/N or N/A	Y/N or N/A	Y/N or N/A	Y/N or N/A	Y/N or N/A
15. No evidence of leakage around piping flanges, elbows and other fittings on Tank 137?												
16. No suspicious or unusual petroleum odors are present in the tank system area?												
17. No signs of distressed vegetation that could be the result of a petroleum release?												
18. Are manway/manhole covers in place correctly?												
19. Are eye wash and safety showers operational?												
20. Are Fire Extinguishers operational and in proper locations?												
21. Alarms (float sensor, optical sensors) in correct position?												
22. Alarm wiring in good condition (not loose or frayed)?												
23. Security fence intact?												
24. Security lighting working properly?												
25. Parking Area Clean - no oil puddles?												
26. Containers Storage Area Clean?												
27. Storage Areas Clean & Free of Spills?												
28. Solid Waste Marked - Processed or Unprocessed.												
INSPECTOR'S INITIALS												
COMMENTS:												

Note: All releases, spill or leaks of Petroleum product over 25 gallons must be reported to the FDEP by the Spill manager.

* An explanation is needed for any item that is answered with a "No"

HOWCO Environmental Services MONTHLY INSPECTION - DETAILS

DATE & INITIALS	Type of Activity		EXPLANATION
	Alarm Verification	Alarm Incidents & Results	
	Tank Malfunctions Piping	Tank Repairs	
	Tank Malfunctions Routine Maintenance	Piping Repairs	
	Monitor Repair	Tank System Modification	
	Tank System Alarm Panel Leak/Spill	Tank Tightness Testing by Vendor	
		Other	
	Alarm Verification	Alarm Incidents & Results	
	Tank Malfunctions Piping	Tank Repairs	
	Tank Malfunctions Routine Maintenance	Piping Repairs	
	Monitor Repair	Tank System Modification	
	Tank System Alarm Panel Leak/Spill	Tank Tightness Testing by Vendor	
		Other	
	Alarm Verification	Alarm Incidents & Results	
	Tank Malfunctions Piping	Tank Repairs	
	Tank Malfunctions Routine Maintenance	Piping Repairs	
	Monitor Repair	Tank System Modification	
	Tank System Alarm Panel Leak/Spill	Tank Tightness Testing by Vendor	
		Other	

Record and activity regarding the fuel tank and/or piping that cannot be recorded or explained on the Monthly Tank System Visual Inspection Checklist.

1. Write the date and your initials in Column 1.
2. Mark the appropriate box in Column 2.
3. Explain in detail whatever occurred, whatever you did and whatever you found during inspections

ATTACHMENT 8

CLOSURE PLAN

USED OIL CLOSURE

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

GENERAL/APPLICABILITY

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

CHARACTERISTICS AND SAMPLING

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

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

SOIL SAMPLING FOR NON-ELIGIBLE AREAS

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

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

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

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

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

DECONTAMINATION

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

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

SOLIDS GENERATED AT CLOSURE

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

ITEM 10.1.1 SCHEDULE FOR CLOSURE

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

Closure schedule:

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

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

SOLID WASTE CLOSURE

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

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

CONTAINER CAPACITY CHART FOR SOLID WASTE STORAGE

<u>55 GALLON DRUM</u>	<u>55 GALLONS</u>
<u>500 GALLON TOTE</u>	<u>500 GALLONS</u>
<u>15 CUBIC YARD CONTAINER</u>	<u>3030 GALLONS</u>
<u>20 CUBIC YARD CONTAINER</u>	<u>4040 GALLONS</u>

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

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

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

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

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

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

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

Closure Performance Standard

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

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

- a) Any spillage of waste onto the impermeable surface would not result in any permanent contamination of that surface after the spill cleanup.
- b) In the unlikely event of any accidental spillage of waste onto the uncovered ground (roadway, access way, etc.) on the property during ingress and egress to the facility's impermeable pad would be dealt with immediately as a spill as outlined in the contingency plan. No permanent contamination would result necessitating any closure decontamination.
- c) When closure is implemented and the facility is out of service, all solid waste, solid waste vehicles and solid waste process equipment will be removed from the facility property within 30 days.
- d) A facility inspection will be made with an independent registered professional environmental engineer to inspect for:
 - waste containers on site,
 - process equipment on site,
 - waste transport vehicle on site,
 - distressed vegetation on site,
 - odors,
 - anomalous residue or chemical debris on site,
 - degeneration or corrosion of impermeable areas on site.
- e) In the event evidence is found at the time of closure that a solid waste discharge may have occurred, the Company shall implement the following:
 - * All appropriate agencies will be notified;
 - * Standard response actions will be initiated to remove and contain the suspected contaminate;
 - * Samples of the affected area and background areas will be taken to determine the type and extent of contamination;
 - * Once immediate or emergency steps have been completed, an assessment plan will be written;

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

Amendment of Closure Plan

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

Consideration for amending the approved closure plan include:

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

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

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

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

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

Disposal or Decontamination of Equipment, Structures and Soils:

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

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

Certification of Closure

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

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

ITEM 10.1.1 SOLID WASTE CLOSURE COST ESTIMATE

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

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

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

Solid Waste Closure Cost Estimate.

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

400 Drums x \$50.00/Drum	= <u>\$20,000.</u>
Subtotal:	\$20,000.

Sampling Labor, Oversight and Analysis

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

Solid Waste Storage Slab Decontamination

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

HOWCO
Used Oil Permit Application

Revision 2
January 9, 2006

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

Engineering Closure Report

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

Total Closure Cost

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

ATTACHMENT 9 TRAINING

Position Descriptions

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

New Employees

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

On-going training

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

APENDIX 1

DRAWINGS & FIGURES

USED OIL CLOSURE COST ESTIMATE

HOWCO Environmental Services

January 11, 2011

Received

JAN 18 2011

BSHW

Used Oil Permit Coordinator
MS 4560
Florida Department of Environmental Protection
2600 Blair Stone Road
Tallahassee, FL 32399-2400

RE: Closing cost estimate updates

To whom it may concern:

Enclosed please find the updated Used Oil Processing Facility Closing Cost Estimate Forms and copies of both Irrevocable Letters of Credit for the following locations:

- 1) HOWCO Environmental Services
843 43rd Street South, St. Petersburg, FL 33711
- 2) HOWCO Environmental Services
24133 State Road 40, Astor, FL 32102

If you have any questions or need additional information, please call me at tel. (727)-437-4059.

Sincerely,



Richard Dillen
Quality Assurance Officer

Cc: File

RECEIVED
RCRA

JAN 18 2011

Hazardous Waste Regulation



Florida Department of Environmental Protection

Bob Martinez Center
2600 Blair Stone Road MS 4565
Tallahassee, Florida 32399-2400

March 19, 2010

Charlie Crist
Governor

Jeff Kottkamp
Lt. Governor

Michael W. Sole
Secretary

Mr. Richard Dillen
Hagan Holding Company
3701 Central Avenue
St. Petersburg, FL 33713

Re: FLD 152764767 – HOWCO Environmental Services Waste Processing Facility

Dear Mr. Dillen:

I reviewed the documentation submitted to demonstrate financial assurance for the above referenced facility and find it is in order. Synovus Bank letter of credit amendment dated January 28, 2010, increasing the credit amount of letter of credit number 296-01 to \$105,000, adequately covers the Department approved closing cost estimate dated February 18, 2010. Therefore, HOWCO Environmental Services Waste Processing Facility 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) 245-8745.

Sincerely,

Frank Hornbrook
Environmental Specialist
Solid Waste Section

cc: Fred Wick, DEP/TLH
Bheem Kothur, DEP/TLH

Bank of America 

BANK OF AMERICA - CONFIDENTIAL

PAGE: 1

DATE: APRIL 11, 2007

AMENDMENT TO IRREVOCABLE STANDBY LETTER OF CREDIT NUMBER: 68014738

AMENDMENT NUMBER 1

ISSUING BANK
BANK OF AMERICA, N.A.
1 FLEET WAY
PA6-580-02-30
SCRANTON, PA 18507-1999

BENEFICIARY
FLORIDA DEPT OF ENVIRONMENTAL
PROTECTION, DIRECTOR, DIVISION OF
WASTE MANAGEMENT

APPLICANT
HAGAN HOLDING COMPANY
3701 CENTRAL AVE
ST. PETERSBURG, FL 33713

TWIN TOWERS OFFICE BUILDING
2600 BLAIR STONE RD MS 4565
TALLAHASSEE, FL. 32399-2400

THIS AMENDMENT IS TO BE CONSIDERED AN INTEGRAL PART OF THE ABOVE CREDIT
AND MUST BE ATTACHED THERETO.

THE ABOVE MENTIONED CREDIT IS AMENDED AS FOLLOWS:

THE AMOUNT OF THIS CREDIT HAS BEEN INCREASED BY USD 8,000.00
THE AGGREGATE AMOUNT OF THE CREDIT IS NOW USD 24,500.00

ALL OTHER TERMS AND CONDITIONS REMAIN UNCHANGED.

IF YOU REQUIRE ANY ASSISTANCE OR HAVE ANY QUESTIONS REGARDING THIS
AMENDMENT, PLEASE CALL 800-370-7519 .



AUTHORIZED SIGNATURE

THIS DOCUMENT CONSISTS OF 1 PAGE(S).

Poor Original

ORIGINAL



**SYNOVUS
BANK**

P.O. Box 30707
Tampa, FL 33630-3707
Toll Free: (888) 317-0085

COPY

**STATE OF FLORIDA
SOLID WASTE MANAGEMENT FACILITY
IRREVOCABLE LETTER OF CREDIT
(AMENDMENT)
TO DEMONSTRATE FINANCIAL ASSURANCE FOR CLOSING**

January 28, 2010

Director, Division of Waste Management
Florida Department of Environmental Protection
Twin Towers Office Building
2600 Blair Stone Road MS 4565
Tallahassee, Florida 32399-2400

Synovus Bank, F/K/A,
Synovus Bank of Tampa Bay
Successor in Interest to
United Bank and Trust Company
P.O. Box 30707
Tampa, FL 33630-3707

Re: Letter of Credit Number 296-01

Expiration date: December 5, 2010

Dear Sir or Madam:

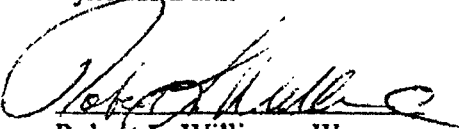
We hereby amend our Irrevocable Letter of Credit No. 296-01 in your favor, at the request and for the account of Hagan Holding Company DBA Howco Environmental Services, 3701 Central Avenue, St. Petersburg, Florida 33713 as follows:

The dollar amount of the Letter of Credit is increased from Ninety-Nine Thousand Eight Hundred Twenty-Eight Dollars and 55/100ths (\$99,828.55) to One Hundred Five Thousand Dollars and 00/100ths (\$105,000.00). All other terms and conditions remain the same.

Except so far as expressly stated, this letter of credit is subject to the Uniform Customs and Practice for Documentary Credits (2007 revision) of the International Chamber of Commerce publication number 600 or its replacement; and as to matters not governed by the UCP, shall be governed by and construed in accordance with the laws of the State of Florida.

Sincerely,

Synovus Bank


Robert L. Williams, III
Senior Vice President



February 18, 2010

Mr. Brian Bizzell
Salem Trust Company
4890 West Kennedy Boulevard
Tampa, FL 33609-1881

RE: Irrevocable Letter of Credit No. 296-01

Mr. Bizzell,

Enclosed please find a copy of the latest amendment of the above mentioned Letter of Credit.

If you have any questions or need additional information, please call me at tel. (727)-437-4059.

Sincerely,

A handwritten signature in black ink, appearing to read 'RDillen', is written over the word 'Sincerely,'.

Richard Dillen
Quality Assurance Officer

Cc: File



February 18, 2010

Solid Waste Financial Coordinator
MS 4565
Florida Department of Environmental Protection
2600 Blair Stone Road
Tallahassee, FL 32399-2400

RE: Closing cost estimate updates

To whom it may concern:

Enclosed please find copies of the updated Used Oil Processing Facility Closing Cost Estimate Forms for the following locations:

- 1) HOWCO Environmental Services
843 43rd Street South, St. Petersburg, FL 33711
- 2) HOWCO Environmental Services
24133 State Road 40, Astor, FL 32102

In addition, I have also included copies of Letter of Credit No's 296-01 and 68014738 for the St. Petersburg and Astor facilities, respectively.

Our records show that Synovus Bank forwarded the latest original amended Irrevocable Letter of Credit No. 296-01 for the amount of \$ 105,000.00 to the Department as can be seen from the following e-mail excerpt:

From: JODY DAVIES [mailto:JodyDavies@synovusbankfl.com]

Sent: Wednesday, February 17, 2010 10:52 AM

To: Thelma Mendenhall

Subject: RE: Help

The original Letter of Credit Amendment was mailed to the beneficiary (certified with return receipt requested) in today's mail run. When I get the green card back, I will let you know. Then you will know the beneficiary has what they asked for.

If you have any questions or need additional information, please call me at tel. (727)-437-4059.

Sincerely,

Richard Dillen
Quality Assurance Officer
Cc: File



Florida Department of Environmental Protection

Twin Towers Office Bldg. • 2600 Blair Stone Road • Tallahassee, Florida 32399-2400

DEP Form #62-710.901(7)
Form Title Used Oil Facility Financial
Assurance Closing Cost Estimate Form
Effective Date June 8, 2005

Used Oil Processing Facility Closing Cost Estimate Form

Date: January 11, 2011

Date of DEP Approval: _____

I. GENERAL INFORMATION: Latitude: 29°09' 46"N Longitude: 81°32'26"W EPA ID Number: FLD 101 828 689

Facility Name: Hagan Holding Company, d/b/a HOWCO Environmental Services Permit Number: 27221-HO-003

Facility Address: 24133 State Road 40, Astor, FL 32102

Mailing Address: 3701 Central Avenue, St. Petersburg, FL 33713

Contact Person's Name: Richard Dillen Phone Number: (727)-437-4059

Email: RDILLEN@HOWCOUSA.COM Fax Number: (727)-328-7782

II. TYPE OF FINANCIAL ASSURANCE DOCUMENT (Check Type)

☒ Letter of Credit* ☐ Performance Bond* ☐ Guaranty Bond* *Indicate mechanisms that
☐ Insurance Certificate ☐ Financial Test ☐ Trust Fund Agreement require use of a Standby
Trust Fund Agreement

III. ESTIMATE ADJUSTMENT: (check and use either box a or b, below)

40 CFR Part 264, Subpart H, as adopted by reference in Rule 62-701.630, Florida Administrative Code, sets forth the method of annual cost estimate adjustment. Cost estimates may be adjusted by using an inflation factor or by recalculating the maximum costs of closing in current dollars. Estimates are due annually between January 1 and March 1. Select one of the methods of cost estimate adjustment below.

☒ (a) Inflation Factor Adjustment

Inflation adjustment using an inflation factor may only be made when a Department approved closing cost estimate exists and no changes have occurred in the facility operation which would necessitate modification to the closure plan. The inflation factor is derived from the most recent Implicit Price Deflator for Gross National Product published by the U.S. Department of Commerce in its survey of Current Business. The inflation factor is the result of dividing the latest published annual Deflator by the Deflator for the previous year. The inflation factor may also be obtained from the Solid Waste Financial Coordinator at (850) 245-8732 or be found online at <http://www.dep.state.fl.us/waste/categories/swfr/>

This adjustment is based on the Department approved closing cost estimate dated: February 10, 2010

\$ 24,228 x 1.010 = \$ 24,470
Latest DEP approved Current Year Inflation Adjusted
Closing Cost Estimate Inflation Factor Annual Closing Cost Estimate

Signature: [Signature] Phone: (727)-437-4059

Name and Title: Richard Dillen, Quality Assurance Officer E-Mail: RDILLEN@HOWCOUSA.COM

If you have questions concerning this form, please contact the Used Oil Coordinator at the address below, by phone at (850) 245-8755, or by E-Mail at: richard.neves@dep.state.fl.us

Please mail this completed cost estimate to:

Please mail a copy of the cost estimate to:

Used Oil Permit Coordinator
MS4560
FDEP
2600 Blair Stone Road
Tallahassee, FL 32399-2400

Solid Waste Financial Coordinator
MS 4565
FDEP
2600 Blair Stone Road
Tallahassee, FL 32399-2400



Florida Department of Environmental Protection

Twin Towers Office Bldg. • 2600 Blair Stone Road • Tallahassee, Florida 32399-2400

DEP Form #92-710.901(2)
Form Title Used Oil Facility Financial
Assurance Closing Cost Estimate Form
Effective Date June 9, 2005

Used Oil Processing Facility Closing Cost Estimate Form

Date: February 18, 2010

Date of DEP Approval: _____

I. GENERAL INFORMATION: Latitude: 27°45'47"N Longitude: 82°41'32"W EPA ID Number: FLD 152 764 767

Facility Name: Hagan Holding Company, d/b/a HOWCO Environmental Services Permit Number: 33721-HO-001

Facility Address: 843 43rd Street South, St. Petersburg, FL 33711

Mailing Address: 3701 Central Avenue, St. Petersburg, FL 33713

Contact Person's Name: Richard Dillen

Phone Number: (727)-437-4059

Email: RDILLEN@HOWCOUSA.COM

Fax Number: (727)-328-7782

II. TYPE OF FINANCIAL ASSURANCE DOCUMENT (Check Type)

☒ Letter of Credit* ☐ Performance Bond* ☐ Guaranty Bond* *Indicate mechanisms that
☐ Insurance Certificate ☐ Financial Test ☐ Trust Fund Agreement require use of a Standby
Trust Fund Agreement

III. ESTIMATE ADJUSTMENT: (check and use either box a or b, below)

40 CFR Part 264, Subpart H, as adopted by reference in Rule 62-701.630, Florida Administrative Code, sets forth the method of annual cost estimate adjustment. Cost estimates may be adjusted by using an inflation factor or by recalculating the maximum costs of closing in current dollars. Estimates are due annually between January 1 and March 1.

1. Select one of the methods of cost estimate adjustment below.

☒ (a) Inflation Factor Adjustment

Inflation adjustment using an inflation factor may only be made when a Department approved closing cost estimate exists and no changes have occurred in the facility operation which would necessitate modification to the closure plan. The inflation factor is derived from the most recent Implicit Price Deflator for Gross National Product published by the U.S. Department of Commerce in its survey of Current Business. The inflation factor is the result of dividing the latest published annual Deflator by the Deflator for the previous year. The inflation factor may also be obtained from the Solid Waste Financial Coordinator at (850) 245-8732 or be found online at <http://www.dep.state.fl.us/waste/categories/swfr/>.

This adjustment is based on the Department approved closing cost estimate dated: February 10, 2009

<u>\$ 99,828.55</u>	x	<u>1.020</u>	=	<u>\$ 101,825.12</u>
Latest DEP approved		Current Year		Inflation Adjusted
Closing Cost Estimate		Inflation Factor		Annual Closing Cost Estimate

Signature: [Signature] Phone: (727)-437-4059

Name and Title: Richard Dillen, Quality Assurance Officer E-Mail: RDILLEN@HOWCOUSA.COM

If you have questions concerning this form, please contact the Used Oil Coordinator at the address below, by phone at (850) 245-8755, or by E-Mail at: richard.neves@dep.state.fl.us

Please mail this completed cost estimate to:

Please mail a copy of the cost estimate to:

Used Oil Permit Coordinator
MS4560
FDEP
2600 Blair Stone Road
Tallahassee, FL 32399-2400

Solid Waste Financial Coordinator
MS 4565
FDEP
2600 Blair Stone Road
Tallahassee, FL 32399-2400

☐ (b) Recalculated Cost Estimates (complete items IV and V)

IV. RECALCULATIONS OF CLOSING COSTS

For the time period in the facility's operation when the extent and manner of its operation makes closing **most expensive**.

Third Party Estimate/Quote must be provided for each item.
Costs must be for a third party providing all materials and labor.

DESCRIPTION	UNIT	QUANTITY	UNIT COST	TOTAL
1. Decontamination and Disposal				
Note: These costs must be broken down by individual waste stream. If contamination is found, the cost estimate must be recalculated to include remediation costs.				
a. Used Oil tanks, containers, piping, equipment and secondary containment decontamination	<u>HRS</u>	<u>40</u>	<u>\$ 220</u>	<u>\$ 8,800</u>
waste characterization	<u>EACH</u>	<u>1</u>	<u>\$ 500</u>	<u>\$ 500</u>
disposal	<u>GAL</u>	<u>0</u>	<u>0</u>	<u>0</u>
b. Wash water				
waste characterization	<u>EACH</u>	<u>1</u>	<u>\$ 500</u>	<u>\$ 500</u>
disposal	<u>GAL</u>	<u>2000</u>	<u>\$ 0.30</u>	<u>\$ 600</u>
c. Sludges/ sediment				
waste characterization	<u>EACH</u>	<u>1</u>	<u>\$ 500</u>	<u>\$ 500</u>
disposal	<u>GAL</u>	<u>2000</u>	<u>\$ 1.00</u>	<u>\$ 2,000</u>
d. Used oil filter management				
waste characterization	<u>N/A</u>			
disposal	<u>Drums</u>	<u>75</u>	<u>\$ 24.00</u>	<u>\$ 1,800</u>
e. Petroleum Contaminated Water (PCW), tanks, containers, piping, equipment and secondary containment				
waste characterization	<u>EACH</u>	<u>1</u>	<u>\$ 500</u>	<u>\$ 500</u>
disposal	<u>GAL</u>	<u>20,000</u>	<u>\$ 0.30</u>	<u>\$ 6,000</u>
f. Mobilization Costs	<u>EACH</u>	<u>1</u>	<u>\$ 500</u>	<u>500</u>
g. other				

Subtotal (1) Decontamination/Disposal: \$ 21,700

2. Engineering (on-site inspections and Quality Assurance are to be included in this item).

a. Closure sampling and analysis plan implementation as described in the permit application

\$ 7,800

b. Closure Certification Report

\$ 1,360

Subtotal (2) Professional Services:

\$ 2,140

Subtotal of (1) and (2) Above:

\$ 23,840

3. Contingency (10% of the Subtotal)

2,400

Closing Cost Subtotal:

\$ 26,240

TOTAL CLOSING COST:

\$ 26,240

V. CERTIFICATION BY ENGINEER and OWNER/OPERATOR

This is to certify that the Financial Assurance Cost Estimates pertaining to the engineering features of the this solid waste management facility have been examined by me and found to conform to engineering principals applicable to such facilities. In my professional judgment, the Cost Estimates are a true, correct and complete representation of the financial liabilities for closing of the facility, and comply with the requirements of Florida Administrative Code (F.A.C.), Rule 62-701.630 and all other Department of Environmental Protection rules, and statutes of the State of Florida. It is understood that the Financial Assurance Cost Estimates shall be submitted to the Department annually between January 1 and March 1 of each year and revised, adjusted and updated as required by Rule 62-701.630(4), F.A.C.

John M. Jones
Signature of Engineer

JOHN M. JONES
Engineer's Name and Title (please print or type)

Tim Hagan Pres
Signature of Owner/Operator

Tim Hagan President & CEO
Owner's Name and Title (please print or type)

50227
Florida Registration Number (please print or type)

727-327-8467
Owner/Operator's Telephone Number

10200 USA TODAY WAY
Engineer's Mailing Address
MIRAMAR, FL 33025

thagan@tampabay.rr.com
Owner/Operator's E-Mail Address

(954) 817-2273
Engineer's Telephone Number

johnm.jones@bellsouth.net
Engineer's email address

**** Transmit Conf. Report ****

P.1

Apr 20 2006 9:30

Telephone Number	Mode	Start	Time	Pages	Result	Note
818502458810	NORMAL	20, 9:29	1'33"	5	* O K	

*FAXED 4/20/06
HOWCO closure cost
ESTIMATES TO*

*~~FAXED~~
TALLAHASSEE*

SUBRA PUTCHA

Thanks, Al

Issues are now resolved.

Please review and notify us on whether you are accepting this and if all of the used oil

previously submitted.

to the same as those on the original submittal so the cost would not change from that.

He did not re-do the closure cost form because he said that the prices quoted compare

Attached are two different third party closure costs submitted by Mike Wolfe of HOWCO.

REMARKS: ☒ Urgent ☒ For your review ☐ Reply ASAP ☐ Please Comment

CC:

Phone #
850-245-8776

850-245-8810

**WASTE MANAGEMENT
TALLAHASSEE**

PROTECTION
13051 NORTH TELECOM
PARKWAY
TEMPLE TERRACE, FL
33637-0926

Phone (813) 632-7600, EXT. 372
Fax Phone (813) 632-7664



Fax Transmission

HOWCO Environmental Services
3701 Central Avenue
St. Petersburg, FL. 33713
(727) 327-8467
Fax (727) 321-6213

To: Al Gephart

Date: 4-20-06

Company: FDEP

Fax #: 813-632-7664

Pages: 4 including cover sheet

From: Michael Wolfe

Subject: 3rd Party Closure Costs

Comments:

Al,

Just in case I went to a second company
for a quote so you have 2 cost estimates.

Michael Wolfe

04/19/2006 09:14

9547883712

JACK MCCULLY JAM ENV

PAGE 01

JAM ENVIRONMENTAL
E VACUUM SERVICES LLC
954-788-3711
877-788-3711
24 HOUR EMERGENCY RESPONSE
POMPANO BEACH FL

Michael Wolfe
Howco Environmental Services
3701 Central Avenue
St. Petersburg, Florida 33713

VIA FACSIMILE (727) 321-6213

Dear Mr. Wolfe,

Per our conversation, JAM Environmental and Vacuum Services, LLC (JAM) is please to provide the following quote for decommissioning services.

Decontamination labor by environmental technicians - \$22.00 per hour
Waste analysis for characterization: \$500 each
Wastewater transportation and disposal - \$0.30 per gallon
Sludge transportation and disposal - \$1.00 per gallon
Transportation and disposal of used oil filters - \$24.00 per 55-gallon drum
PCW transportation and disposal - \$0.30 per gallon
Mobilization - \$500 per unit

I am sure certain other auxillary supplies and services would be required, in general personal and safety equipment will be \$50 per man per day.

Please feel free to contact me at either the office @ 877 788 3711 or cell @ 561 762 4227.

Thanks for the opportunity to work with you.

Jack McCully,
President,
JAM Environmental & Vacuum Services, LLC
April 19, 2006

USED OIL + FILTER RECYCLING
DRUM SERVICES
INDUSTRIAL WASTE WATER

VAC-CON SERVICES - JET RODDER
STORM DRAIN - HYDRO EXCAVATION
PETROLEUM TANK CLEANING

Petroleum Management, Inc.

2191 S.W. 115 Terrace

Davie, Florida 33325

(954) 581-4455 ☎ Fax (954) 583-0252

PROPOSAL /ACCEPTANCE FOR SERVICES

Proposal Submitted To: Howco Environmental Services

Fax: (727) 321-6213

Date: 4/19/06

Email: mikewolfe@howcousa.com

Street: 3701 Central Avenue

Job Name: Same

City, State, and Zip Code: St. Petersburg, Florida 33713

Job Location: Same

Attention: Mr. Mike Wolfe

PETROLEUM MANAGEMENT, INC. IS PLEASED TO SUBMIT OUR PROPOSAL FOR LABOR, EQUIPMENT, MATERIALS AND TRANSPORTATION FOR THE WORK REQUIRED TO PROVIDE PERSONNEL AND EQUIPMENT TO PERFORM DECONTAMINATION SERVICES FOR STORAGE TANKS AND CONTAINMENTS AS REQUIRED. ITEMIZED WORK AND UNITS COSTS AS BELOW.

THIS WORK AS ITEMIZED BELOW:

- ITEM #1: MOBILIZATION TO SITE FOR EACH WORK CREW AND TRUCK: \$500.00
- NOTE:** HOWCO WILL PROVIDE REASONABLE HOTEL AND PER DIEM AS REQUIRED FOR P.M.I. PERSONNEL.
- ITEM #2: EACH WORK CREW CONSISTS OF TWO (2) TRAINED FIELD TECHNICIANS WITH P.P.E. AND ONE (1) TRUCK. PORTAL TO PORTAL: \$220.00/HR.
- ~~ITEM #3: LABORATORY ANALYSIS BY A SITE-LOCAL F.D.E.P. LABORATORY FOR EACH CHARACTERIZATION AS NEEDED: \$500.00~~
- ITEM #4: NON-HAZARDOUS IMPACTED WATER FOR RECYCLING/DISPOSAL: \$.30/GAL
- ITEM #5: NON-HAZARDOUS, PETROLEUM-IMPACTED SLUDGE/SOIL FOR RECYCLING/DISPOSAL: \$1.00/GAL
- ITEM #6: RECYCLING/DISPOSAL OF DRUMS OF USED OIL FILTERS: \$24.00/DRUM
- ITEM #7: PETROLEUM-CONTAMINATED WATER FOR RECYCLING/DISPOSAL: \$.30/GAL

PLEASE NOTE:

A SIGNED PROPOSAL AND COMPLETED AND APPROVED CREDIT APPLICATION ALONG WITH A DEPOSIT OF \$10,000.00 ARE REQUIRED BY P.M.I. PRIOR TO INITIATING THE WORK.

IF CIRCUMSTANCES BEYOND P.M.I.'S CONTROL REQUIRE DIFFERENT AND ADDITIONAL LABOR NOT INCLUDED ABOVE, THE CLIENT WILL BE CHARGED AT \$70.00 PER MAN-HOUR.

We Propose hereby to furnish material and Labor - Complete in accordance with above specifications, for the sum of:

TOTAL AMOUNT DUE UPON COMPLETION OF THE WORK AND RECEIPT OF THIS INVOICE

All material is guaranteed to be as specified. All work to be completed in a workmanlike manner according to standard practices. "A service charge equal to the maximum legal interest allowed by law will be charged on all accounts with balances that are past due, in the event Petroleum Management, Inc., has to retain an attorney to recover any sum that may be due under this agreement or order, then in such event, the customer shall reimburse Petroleum Management, Inc., for all fees incurred together with all costs of litigation and other expenses incurred in connection with said collection." Please be advised that P.M.I. invoicing will only reflect actual quantities removed and the work performed. All agreements contingent upon strikes, accidents or delays beyond our control. Owner shall carry fire, tornado and other necessary insurance. Our workers are fully covered by Workmen's Compensation.

Authorized

Signature _____

Judd Gilbert, President

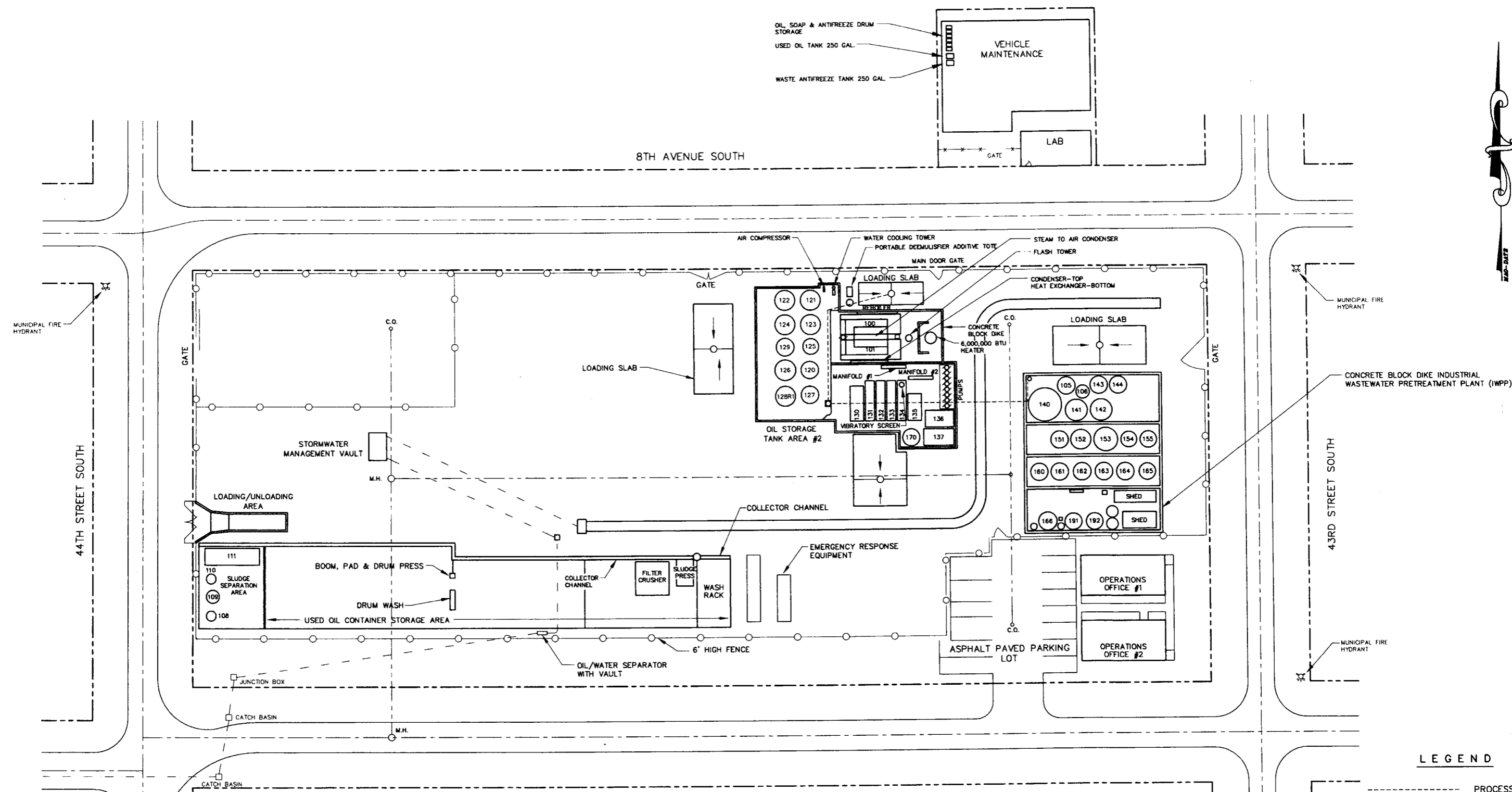
Note: This proposal may be withdrawn by us if not accepted within 30 days.

Acceptance of Proposal, The above prices, specifications and conditions are satisfactory and are hereby accepted. You are authorized to do the work as specified. Terms and conditions are outlined on the back of the proposal.

Signature: _____

Date of Acceptance _____

Signature: _____



GENERAL INFORMATION

FACILITY NAME - HOWCO ENVIRONMENTAL SERVICES
 LOCATION/MAILING ADDRESS - 843 43RD STREET SOUTH - ST. PETERSBURG, FL 33711
 TELEPHONES - (727) 323-0818 - (727) 327-8467 - 1-800-435-8467
 FAX - (727) 323-2249
 FACILITY EPA ID NO - FLD 152764767
 STATE (EMPLOYER) ID NO. - 59-2599751
 LAND AREA - 3.2 ACRES
 SITE INFORMATION - NEAREST COMMUNITY - SURROUNDING AREA
 NEAREST WATERWAY - 3 MILES S/SW
 NEAREST BUILDING - 200 FT EACH DIRECTION
 GROUNDWATER FLOW - SW
 NEAREST GROUNDWATER USE - NONE WITHIN 1 MILE
 PREVAILING WIND - WINTER NW TO SE - SUMMER EASTERLY
 LOCATION INFORMATION - INDUSTRIAL PARK LOCATION
 FLOOD INFORMATION - 100 YEAR FLOOD PLAN

STAFF: MANAGEMENT/SUPERVISION - 2
 PLANT OPERATIONS - 10
 DRIVERS/FIELD - 12
 LAB/ MAINTENANCE - 4
 TOTAL 28

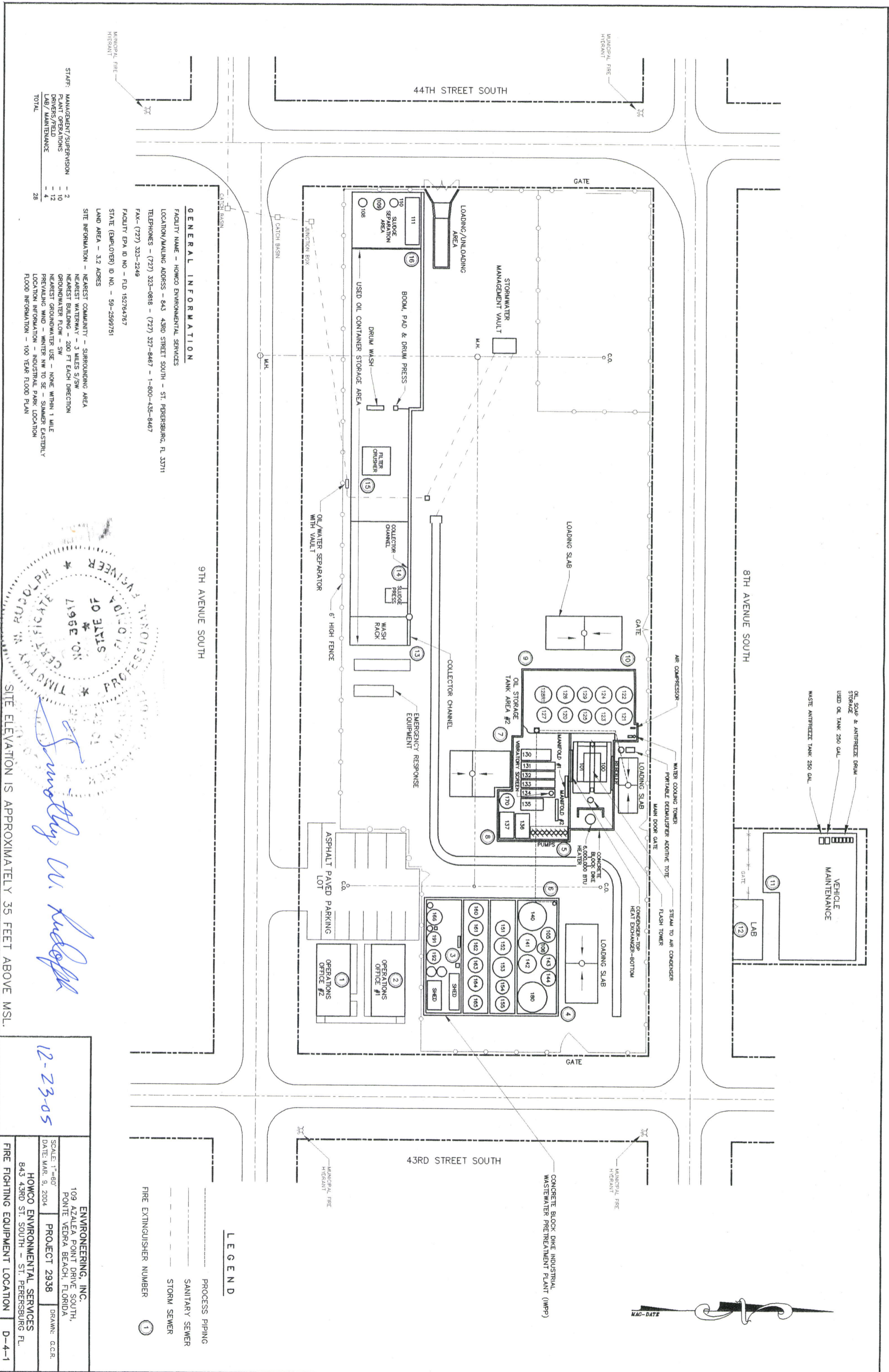
LEGEND

----- PROCESS PIPING
 ----- SANITARY SEWER
 ----- STORM SEWER

SITE ELEVATION IS APPROXIMATELY 35 FEET ABOVE MSL.

ENCLOSURE (3)
 ENVIRONEERING, Inc. Ltr Dtd 7/22/10

ENVIRONEERING, INC. 109 AZALEA POINT DRIVE SOUTH, PONTE VEDRA BEACH, FLORIDA		
SCALE: 1"=60'	PROJECT 3947	DRAWN: G.C.R.
DATE: MAY 25, 2010	HOWCO ENVIRONMENTAL SERVICES	
843 43RD ST. SOUTH - ST. PETERSBURG FL.		
FACILITY SITE PLAN		FIGURE 2





109 AZALEA POINT DRIVE SOUTH • PONTE VEDRA BEACH • FLORIDA • 32082

April 8, 2010

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

REFERENCE: The No Exposure Certifications for Exclusion from NPDES Stormwater
Permitting for the St. Petersburg, Florida and Astor, Florida Facilities.

Dear Mr. Hagan:

Please review and sign the attached letter addressed to the NPDES Stormwater Notices Center and the No Exposure Certifications for Exclusion from NPDES Stormwater Permitting for both the St. Petersburg, Florida and Astor, Florida facilities. Please forward signed copies to the Florida Department of Environmental Management and to Environeering, Incorporated.

I can be reached at (904) 665-0100 or mobile (904) 612-1456 if you should have any questions.
Thanks for the opportunity to be of service!

Sincerely,

Tim Rudolph
President

<HOWCO COVER LETTER-3863>

ENCLOSURE (2)

(904) 665-0100

(904) 612-1456 • MOBILE

(904) 665-0101 • FAX

April 8, 2010

NPDES Stormwater Notices Center, MS# 2510
Attn: Ms. Jessica Kleinfelter
Florida Department of Environmental Management
2600 Blair Stone Road
Tallahassee, FL 32399-2400

REFERENCE: No Exposure Certification for Exclusion from NPDES Stormwater Permitting
for the St. Petersburg, Florida and Astor, Florida Facilities.

Dear Ms. Kleinfelter:

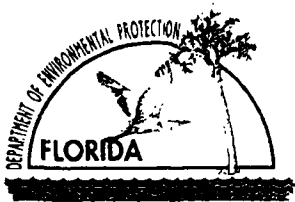
HOWCO Environmental Services is submitting the attached No Exposure Certification for
Exclusion from NPDES Stormwater Permitting for the facilities located in St. Petersburg, Florida
and Astor, Florida. A total fee of \$400 (\$200 for each facility) is enclosed.

If you have any questions, please call Mr. Tim Rudolph at 904-665-0100 (office) or 904-612-
1456 (mobile).

Sincerely,

Timothy Hagan
President and CEO
HOWCO Environmental Services

<NPDES COVER LETTER-3863>



NO EXPOSURE CERTIFICATION FOR EXCLUSION FROM NPDES STORMWATER PERMITTING (FORM 62-620.910(17), F.A.C.)

Incorporated by reference in Rule 62-620.100(2)(o)1.b., F.A.C.

Submission of this No Exposure Certification and certification fee constitutes your affirmation that the entity identified in Section II does not require permit authorization for stormwater discharges associated with industrial activity pursuant to paragraph 62-620.100(2)(o), F.A.C., due to the existence of a condition of no exposure.

A condition of no exposure exists at an industrial facility when all industrial materials and activities are protected by a storm resistant shelter to prevent exposure to precipitation and/or runoff. Industrial materials or activities include, but are not limited to, material handling equipment or activities, industrial machinery, raw materials, intermediate products, by-products, final products or waste products. Material handling activities include the storage, loading and unloading, transportation or conveyance of any raw material, intermediate product, final product or waste product. A storm resistant shelter is not required for the following industrial materials and activities:

- drums, barrels, tanks and similar containers that are tightly sealed, provided those containers are not deteriorated and do not leak. "Sealed" means banded or otherwise secured and without operational taps or valves;
- adequately maintained vehicles used in material handling; and
- final products, other than products that would be mobilized in stormwater discharges (e.g., rock salt).

A No Exposure Certification must be provided for each facility qualifying for the no exposure exclusion. In addition, the exclusion from permitting is available on a facility-wide basis only and not for individual outfalls. If any industrial activities or materials are or will be exposed to precipitation, the facility is not eligible for the no exposure exclusion.

By signing and submitting this No Exposure Certification form, the entity in Section II is certifying that a condition of no exposure exists at its facility or site and is obligated to comply with the terms and conditions of 62-620.100(2)(o), F.A.C.

ALL INFORMATION MUST BE PROVIDED ON THIS FORM.

Detailed instructions for completing this form and obtaining the No Exposure exclusion are provided on pages 5-7.

I. IDENTIFICATION NUMBER:

Facility ID: _____

II. APPLICANT INFORMATION:

A. Operator Name: HOWCO Environmental Services		B. Operator Status: P	
C. Address: 3701 Central Avenue			
D. City: St. Petersburg		E. State: FL	F. Zip Code: 33713
G. Responsible Authority: Timothy Hagan			
H. Responsible Authority's Phone No.: (727) 327-8467			

I. Responsible Authority's Fax No.: (727) 497-0405

J. Responsible Authority's E-mail Address: thagan@howcousa.com

III. FACILITY/SITE LOCATION INFORMATION:

A. Facility Name: HOWCO Environmental Services – St. Petersburg Facility

B. Street Address: 843 43rd Street South

C. City: St. Petersburg

D. State: FL

E. Zip Code: 33713

F. County: Pinellas

G. Latitude: 27° 45' 47 " N

Longitude: 82 ° 41 ' 32 " W

H. Is the facility located on Indian Country Lands? ☐ Yes ☒ No

I. Water Management District: SW Florida

J. Facility Contact: Timothy Hagan

K. Facility Contact's Phone No.: (727) 327-8467

L. Facility Contact's Fax No.: (727) 497-0405

M. Facility Contact's E-mail Address: thagan@howcousa.com

IV. FACILITY ACTIVITY INFORMATION:

A. SIC or Designated Activity Code(s): Primary: 5171

Secondary:

B. Total size of site associated with industrial activity: 3.2 acres

C. Has a roof or pavement been installed over a formerly exposed pervious area in order to qualify for the no exposure exclusion? ☐ Yes ☒ No

D. If yes, indicate approximately how much area was paved or roofed over. Completing this question does not disqualify the applicant from the no exposure exclusion.

Less than 1,000 square feet 1,000 square feet to one acre More than one acre

V. EXPOSURE CHECKLIST:

Are any of the following materials or activities exposed to precipitation, now or in the foreseeable future? (Please check either "Yes" or "No" in the appropriate box.) If you answer "Yes" to any of these questions (1) through (11), you are not eligible for the no exposure exclusion.

- | | |
|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------------------------------------------------|
| 1. Using, storing or cleaning industrial machinery or equipment and areas where residuals from using, storing or cleaning industrial machinery or equipment remain and are exposed to stormwater. | <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No |
| 2. Materials or residuals on the ground or in stormwater inlets from spills/leaks. | <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No |
| 3. Materials or products from past industrial activity. | <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No |
| 4. Material handling equipment (except adequately maintained vehicles). | <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No |
| 5. Materials or products during loading, unloading or transporting activities. | <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No |
| 6. Materials or products stored outdoors [except final products intended for outside use (e.g., new cars) where exposure to storm water does not result in the discharge of pollutants]. | <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No |
| 7. Materials contained in open, deteriorated or leaking storage drums, barrels, tanks and similar containers. | <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No |
| 8. Materials or products handled or stored on roads or railways owned or maintained by the discharger. | <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No |
| 9. Waste material [except waste in covered, non-leaking containers (e.g., dumpsters)]. | <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No |
| 10. Application or disposal of process wastewater (unless otherwise permitted). | <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No |
| 11. Particulate matter or visible deposits of residuals from roof stacks and/or vents not otherwise regulated (i.e., under an air quality control permit) and evident in the stormwater outflow. | <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No |

VI. CERTIFICATION¹:

I certify under penalty of law that I have read and understand the eligibility requirements as set out in 62-620.100(2)(o), F.A.C., and this form, for claiming a condition of "no exposure" and obtaining an exclusion from NPDES stormwater permitting.

I certify under penalty of law that there are no discharges of stormwater contaminated by exposure to industrial activities or materials from the industrial facility or site identified in this document [except as allowed under paragraph 62-620.100(2)(o)].

I understand that I am obligated to submit a no exposure certification form once every five years to the Department of Environmental Protection and to the operator of the local municipal separate storm sewer system (MS4) into which the facility discharges (where applicable). I understand that I must allow the Department of Environmental Protection, or MS4 operator where the discharge is into the local MS4, to perform inspections to confirm the condition of no exposure. I understand that I must obtain coverage under a permit authorized by 403.0885, F.S. prior to any point source discharge of stormwater associated with industrial activity from the facility or at any such time I anticipate that the conditions of no exposure shall no longer apply to the facility. I further understand that the Department may determine that stormwater discharge from the facility is the cause of, or contributes to, a violation of an applicable water quality standard, including designated use, and require that I obtain a permit for the discharge at which time I would no longer be eligible for the no exposure exclusion.

Additionally, 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 for knowing violations.**

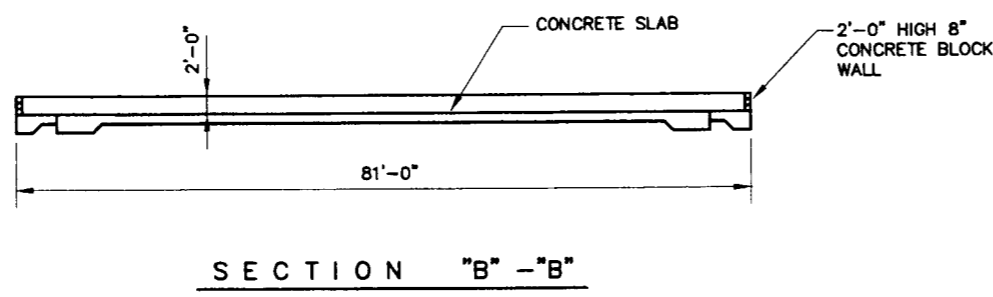
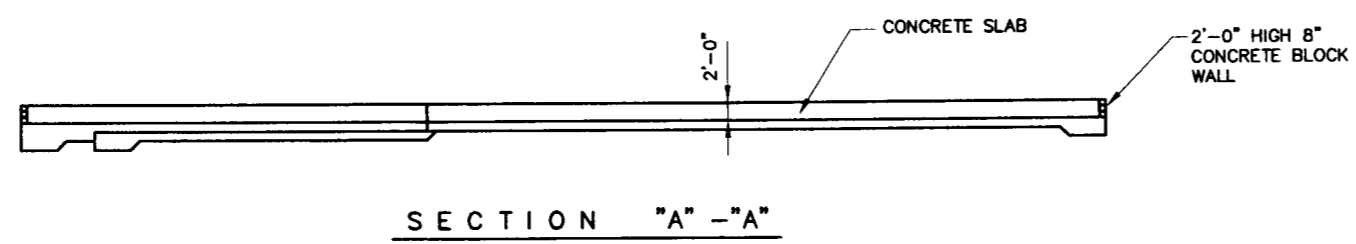
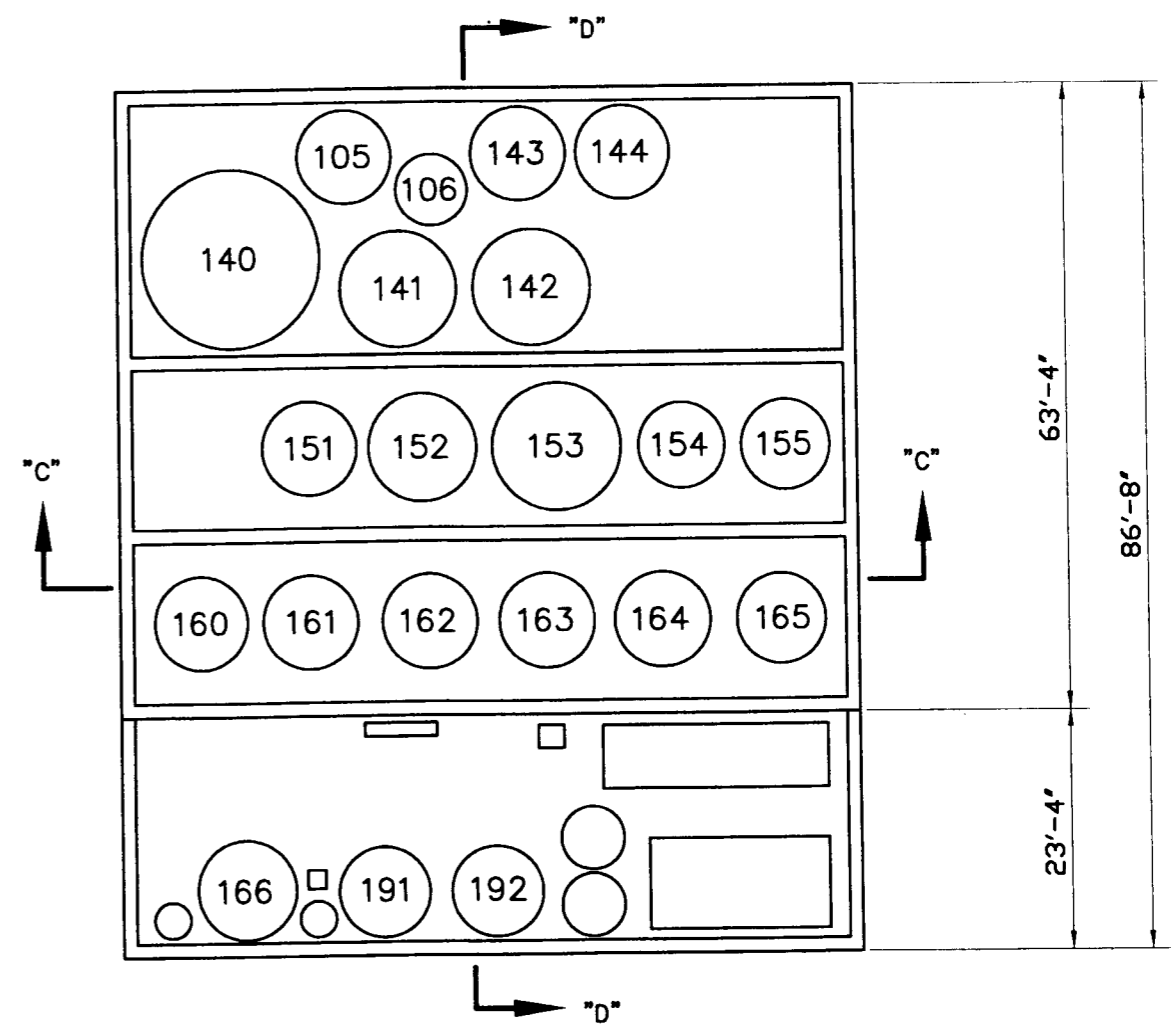
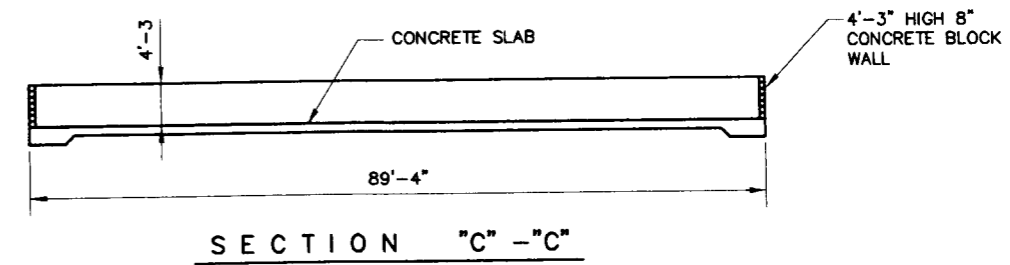
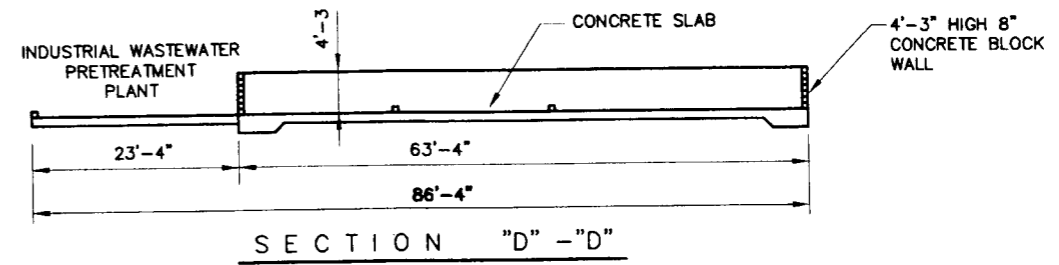
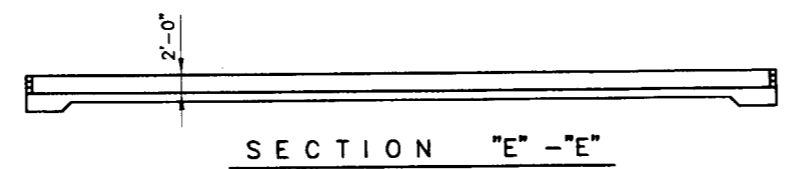
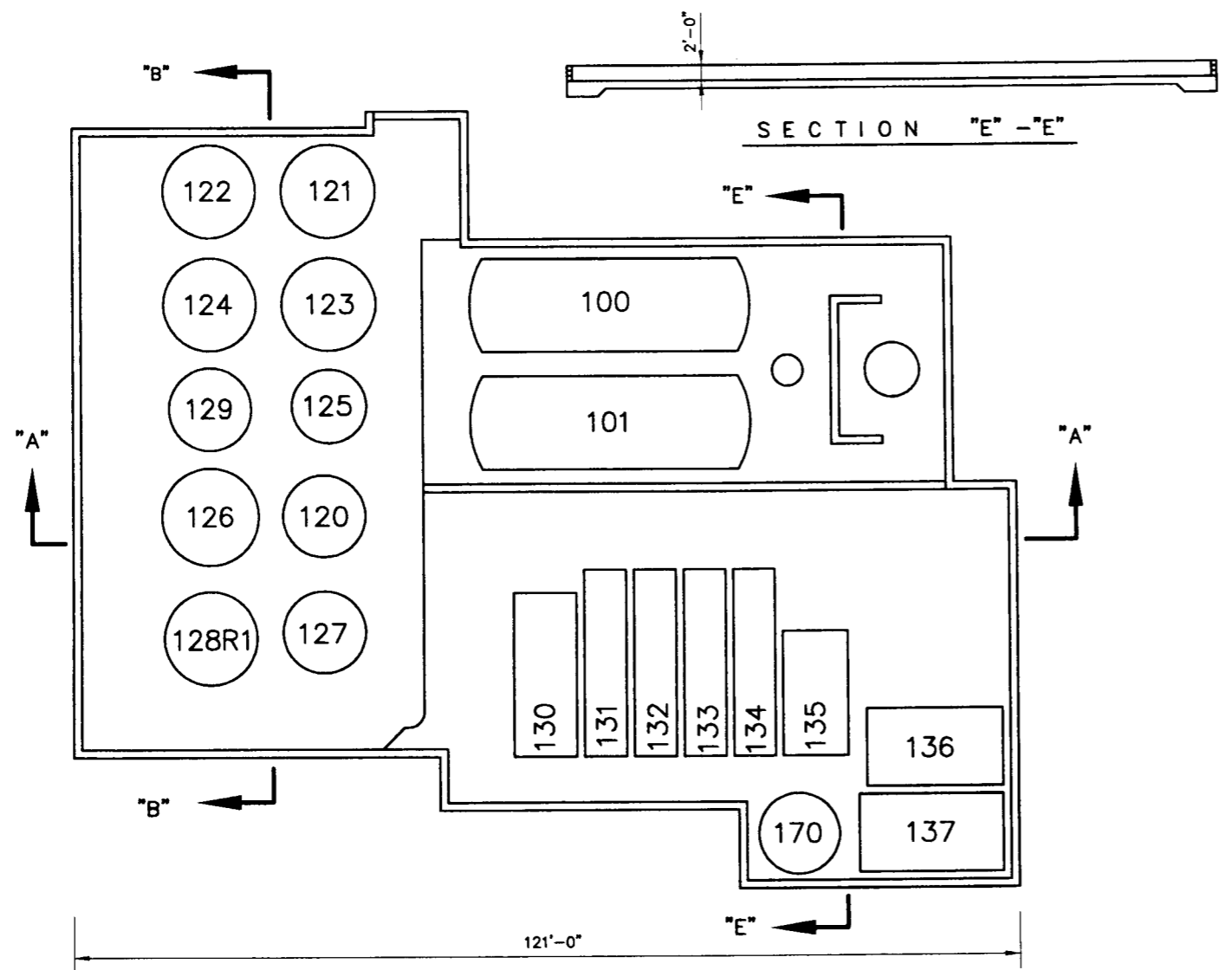
Responsible Authority Name and Official Title (Type or Print):

Timothy Hagan – President and CEO

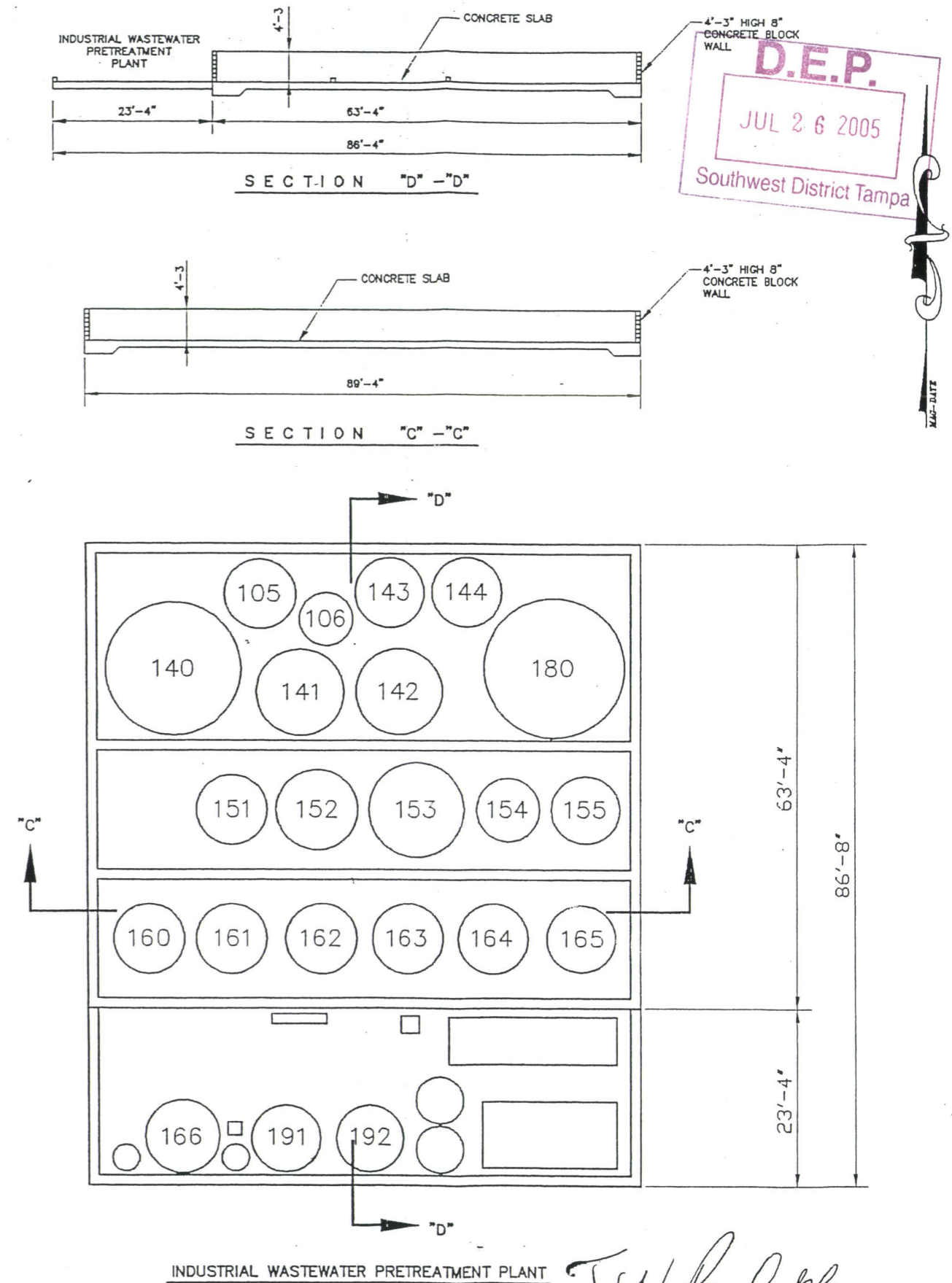
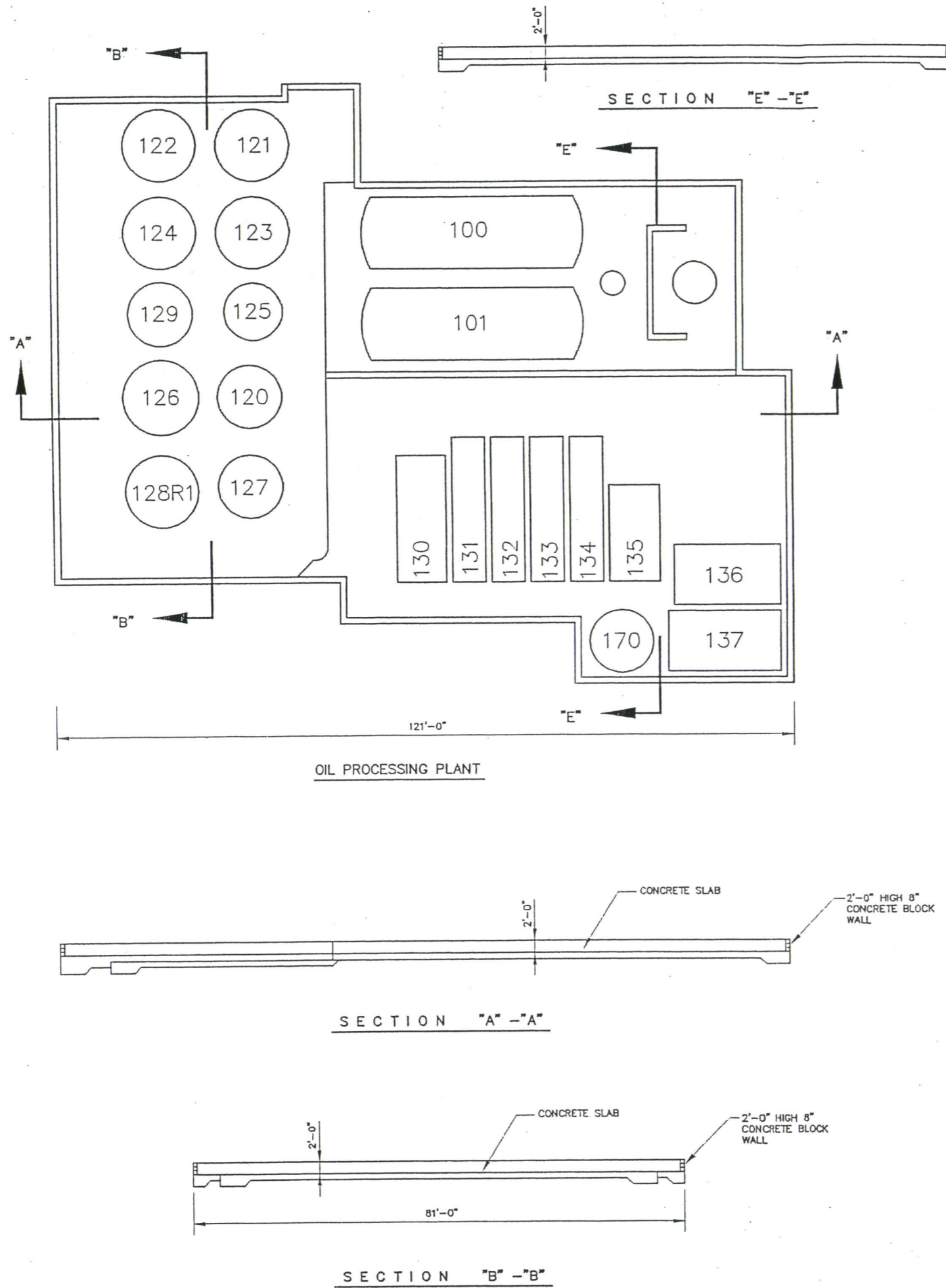
Responsible Authority Signature: _____

Date Signed: _____

¹ Signatory requirements are contained in Rule 62-620.305, F.A.C.



ENVIRONNEERING, INC. 109 AZALEA POINT DRIVE SOUTH, PONTE VEDRA BEACH, FLORIDA		
SCALE: DATE: MAY 25, 2010	PROJECT 3947	DRAWN: G.C.R.
HOWCO ENVIRONMENTAL SERVICES 843 43RD ST. SOUTH - ST. PERERSBURG FL.		
SPILL CONTAINMENT DIKES PLAN		D-4-2



D.E.P.
JUL 26 2005
Southwest District Tampa

JW Rudolph

3/10/04
D-4-2

ENVIRONNEERING, INC. 109 AZALEA POINT DRIVE SOUTH, PONTE VEDRA BEACH, FLORIDA		
SCALE: DATE: MAR. 9, 2004	PROJECT 2559	DRAWN: G.C.
HOWCO ENVIRONMENTAL SERVICES 843 43RD ST. SOUTH - ST. PETERSBURG FL.		
SPILL CONTAINMENT DIKES PLAN		D-4

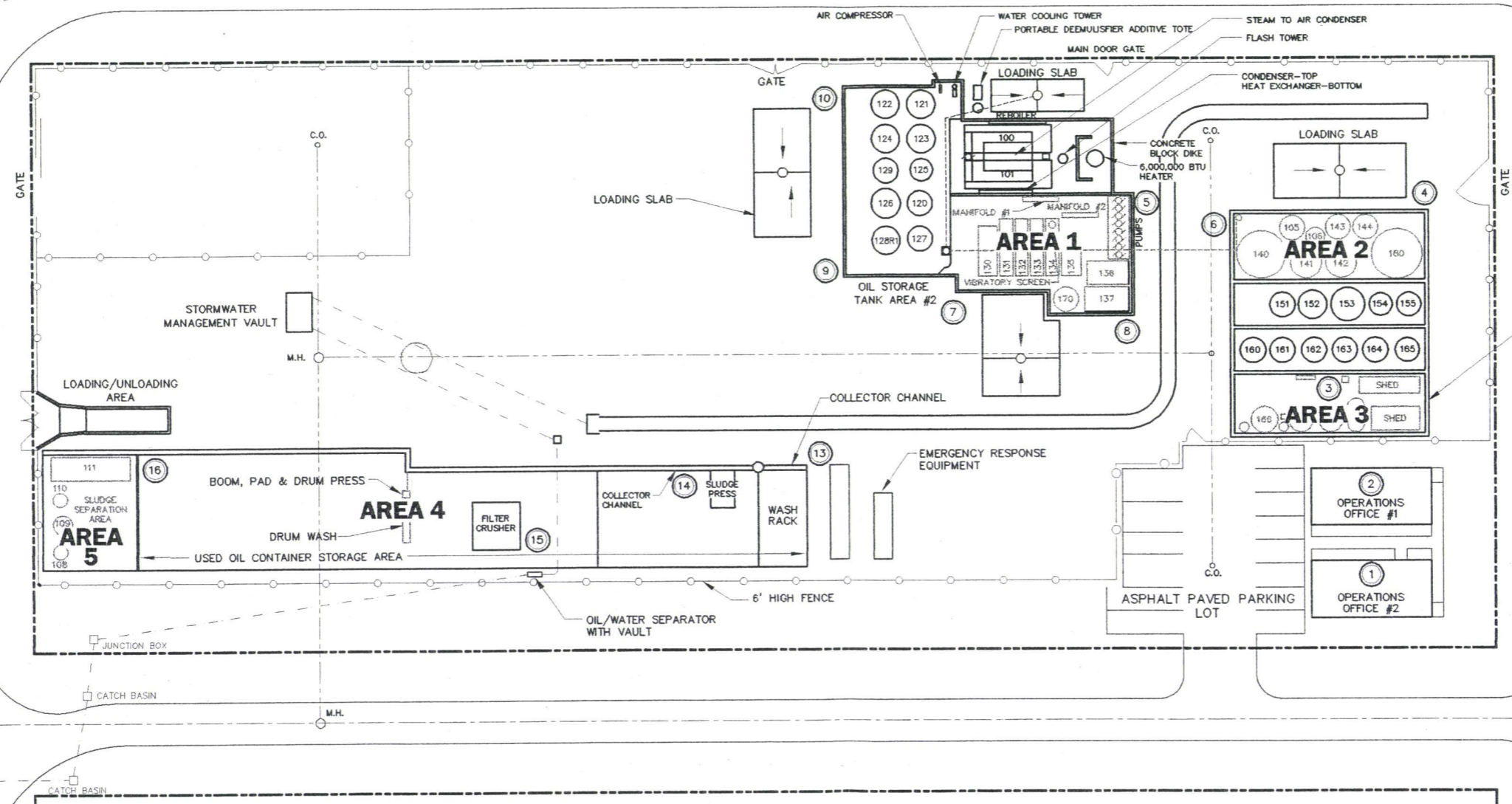
OIL SOAP & ANTIFREEZE DRUM STORAGE
 USED OIL TANK 250 GAL.
 WASTE ANTIFREEZE TANK 250 GAL.

VEHICLE MAINTENANCE

LAB

8TH AVENUE SOUTH

WAC-DITE



CONCRETE BLOCK DIKE INDUSTRIAL WASTEWATER PRETREATMENT PLANT (IWPP)

43RD STREET SOUTH

44TH STREET SOUTH

9TH AVENUE SOUTH

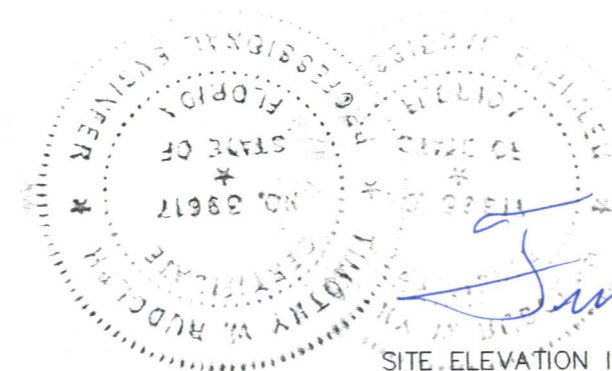
LEGEND

- PROCESS PIPING
- SANITARY SEWER
- STORM SEWER
- FIRE EXTINGUISHER NUMBER ①

GENERAL INFORMATION

FACILITY NAME - HOWCO ENVIRONMENTAL SERVICES
 LOCATION/MAILING ADDRESS - 843 43RD STREET SOUTH - ST. PETERSBURG, FL 33711
 TELEPHONES - (727) 323-0818 - (727) 327-8467 - 1-800-435-8467
 FAX - (727) 323-2249
 FACILITY EPA ID NO - FLD 152764767
 STATE (EMPLOYER) ID NO. - 59-2599751
 LAND AREA - 3.2 ACRES
 SITE INFORMATION - NEAREST COMMUNITY - SURROUNDING AREA
 NEAREST WATERWAY - 3 MILES S/SW
 NEAREST BUILDING - 200 FT EACH DIRECTION
 GROUNDWATER FLOW - SW
 NEAREST GROUNDWATER USE - NONE WITHIN 1 MILE
 PREVAILING WIND - WINTER NW TO SE - SUMMER EASTERLY
 LOCATION INFORMATION - INDUSTRIAL PARK LOCATION
 FLOOD INFORMATION - 100 YEAR FLOOD PLAN

STAFF:	MANAGEMENT/SUPERVISION	- 2
	PLANT OPERATIONS	- 10
	DRIVERS/FIELD	- 12
	LAB/ MAINTENANCE	- 4
	TOTAL	28



Timothy W. Ludolph

SITE ELEVATION IS APPROXIMATELY 35 FEET ABOVE MSL.

ENVIRONNEERING, INC. 109 AZALEA POINT DRIVE SOUTH, PONTE VEDRA BEACH, FLORIDA		
SCALE: 1"=60'	DATE: MAR. 9, 2004	PROJECT 2938
HOWCO ENVIRONMENTAL SERVICES 843 43RD ST. SOUTH - ST. PETERSBURG FL.		
AREA LOCATION MAP		D-4-3

12-23-05

and Projects, W:\envi\engineering\howco.dwg Wed Mar 10 09:24:34 2004

MUNICIPAL FIRE HYDRANT

44TH STREET SOUTH

8TH AVENUE SOUTH

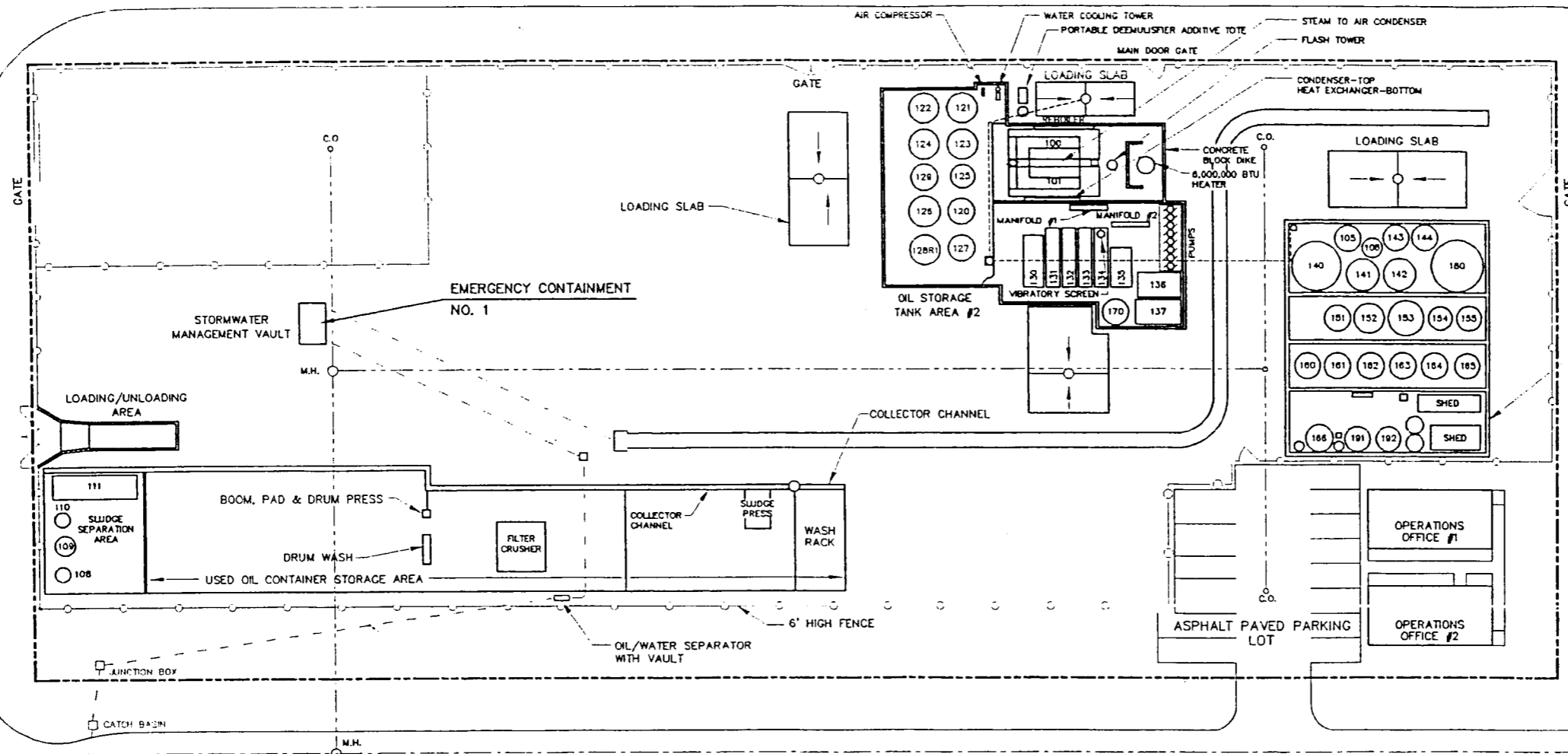
OIL, SOAP & ANTIFREEZE DRUM STORAGE
USED OIL TANK 250 GAL.
WASTE ANTIFREEZE TANK 250 GAL.

VEHICLE MAINTENANCE

LAB

GATE

MUNICIPAL FIRE HYDRANT



MUNICIPAL FIRE HYDRANT

CONCRETE BLOCK DIKE INDUSTRIAL WASTEWATER PRETREATMENT PLANT (IWPP)

43RD STREET SOUTH

MUNICIPAL FIRE HYDRANT

9TH AVENUE SOUTH

GENERAL INFORMATION

FACILITY NAME - HOWCO ENVIRONMENTAL SERVICES
LOCATION/MAILING ADDRESS - 843 43RD STREET SOUTH - ST. PETERSBURG, FL 33711
TELEPHONES - (727) 323-0818 - (727) 327-8467 - 1-800-435-8467
FAX - (727) 323-2249
FACILITY EPA ID NO - FL0152764767
STATE (EMPLOYER) ID NO. - 59-2599751
LAND AREA - 3.2 ACRES
SITE INFORMATION - NEAREST COMMUNITY - SURROUNDING AREA
NEAREST WATERWAY - 3 MILES S/SW
NEAREST BUILDING - 200 FT EACH DIRECTION
GROUNDWATER FLOW - SW
NEAREST GROUNDWATER USE - NONE WITHIN 1 MILE
PREVAILING WIND - WINTER NW TO SE - SUMMER EASTERLY
LOCATION INFORMATION - INDUSTRIAL PARK LOCATION
FLOOD INFORMATION - 100 YEAR FLOOD PLAN

STAFF: MANAGEMENT/SUPERVISION - 2
PLANT OPERATIONS - 10
DRIVERS/FIELD - 12
LAB/ MAINTENANCE - 4
TOTAL 28

LEGEND

----- PROCESS PIPING
----- SANITARY SEWER
----- STORM SEWER

J.W. Rudolph

3/10/04

ENVIRONTEERING, INC.
109 AZALEA POINT DRIVE SOUTH,
PONTE VEDRA BEACH, FLORIDA

SCALE: 1"=60'
DATE: MAR. 9, 2004

PROJECT 2559

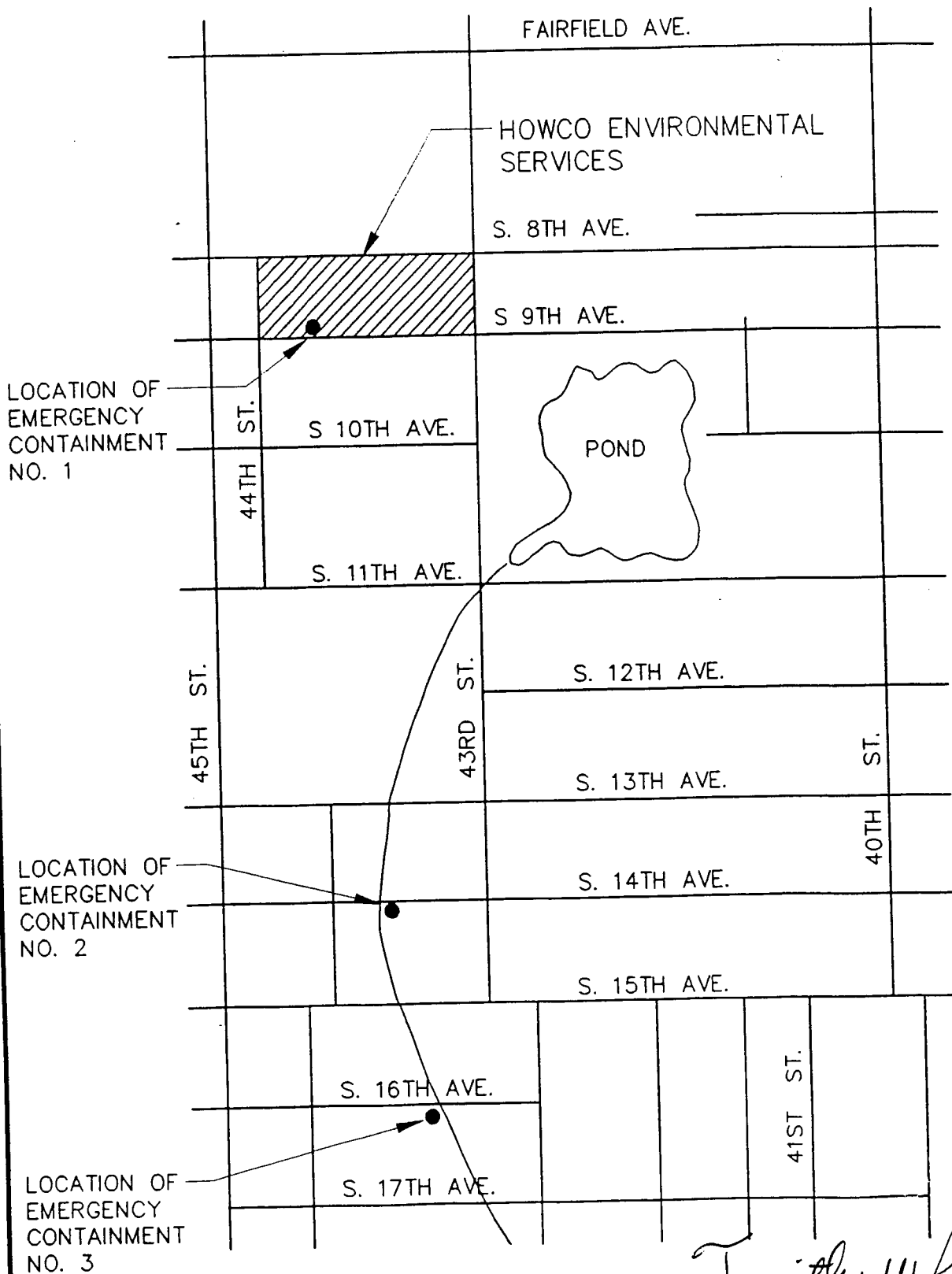
DRAWN: G.C.R.

HOWCO ENVIRONMENTAL SERVICES
843 43RD ST. SOUTH - ST. PETERSBURG FL.

EMERGENCY CONTAINMENT NO. 1 | D-6-1

SITE ELEVATION IS APPROXIMATELY 35 FEET ABOVE MSL

EMERGENCY CONTAINMENT NUMBER 1, 2 AND 3



7-15-99

Timothy W. Rudolph JCN 1161

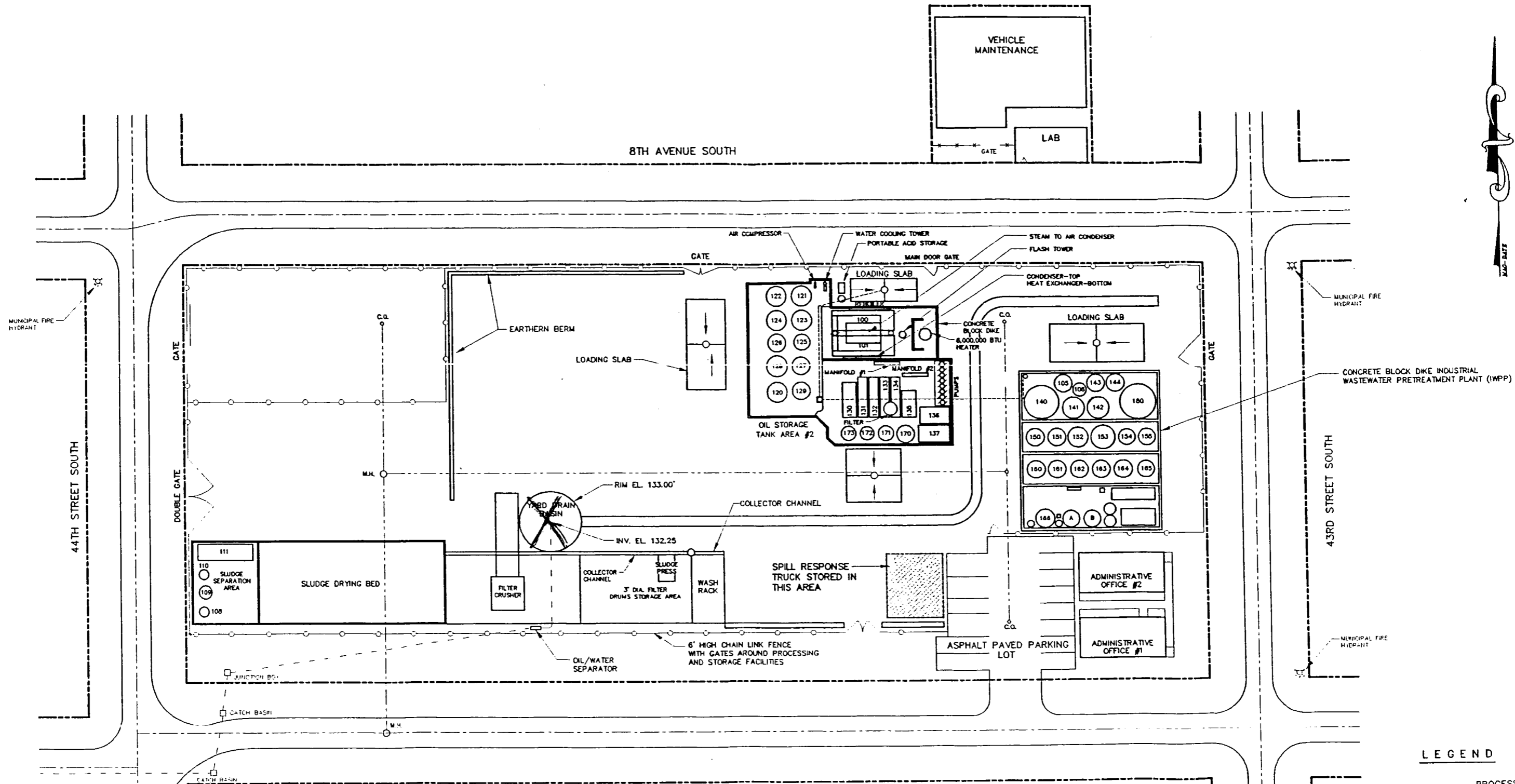
PREPARED FOR:

HOWCO ENVIRONMENTAL SERVICES
3701 CENTRAL AVENUE
ST. PETERSBURG, FLORIDA 33711

FIGURE
D-6-2

PREPARED BY:

TIMOTHY W. RUDOLPH, P.E.
ENVIRONEERING, INC.
109 AZALEA POINT DRIVE SOUTH
PONTE VEDRA BEACH, FLORIDA 32082



GENERAL INFORMATION

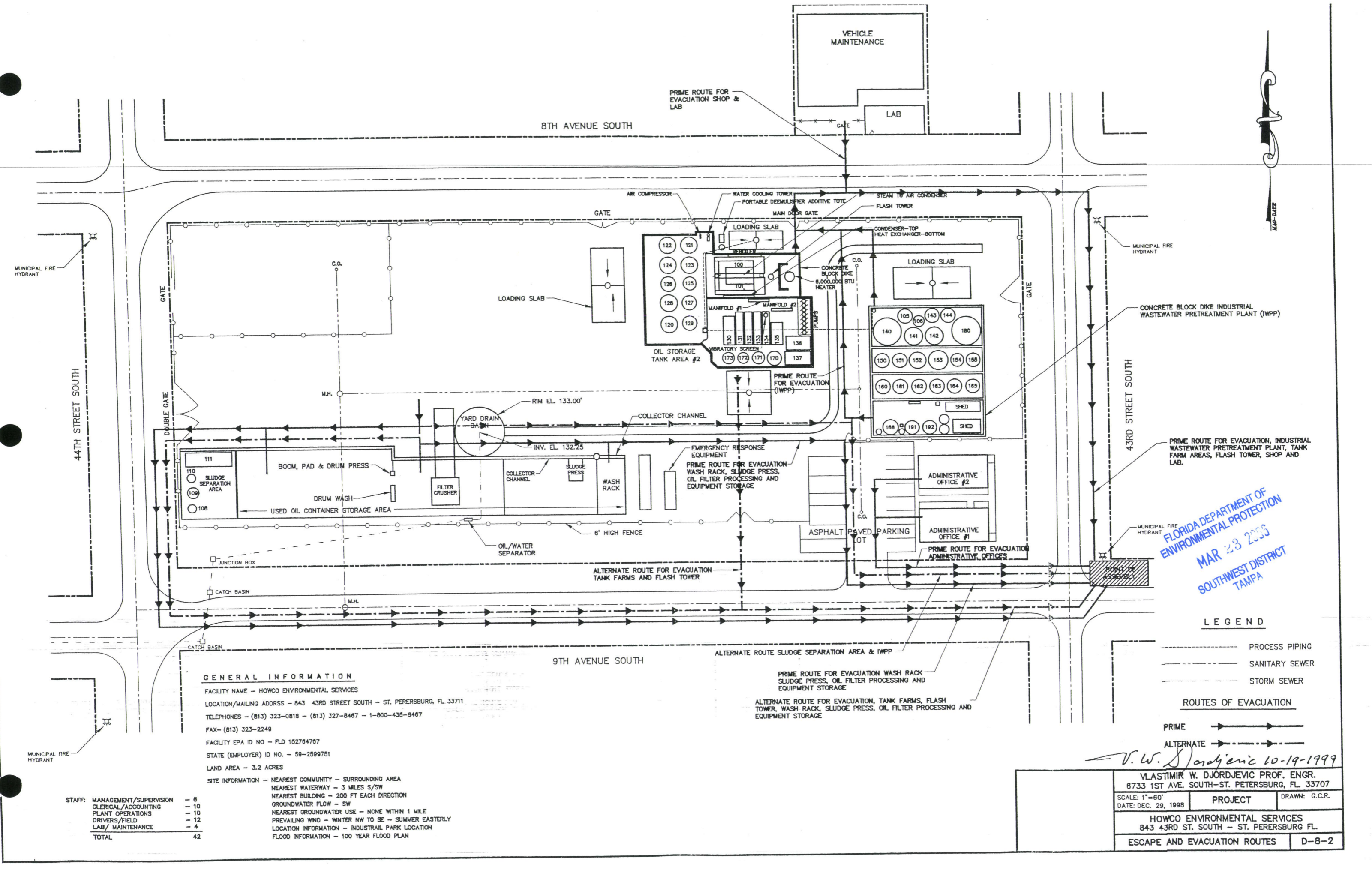
FACILITY NAME - HOWCO ENVIRONMENTAL SERVICES
 LOCATION/MAILING ADDRESS - 843 43RD STREET SOUTH - ST. PETERSBURG, FL 33711
 TELEPHONES - (813) 323-0818 - (813) 327-8467 - 1-800-435-8467
 FAX - (813) 323-2249
 FACILITY EPA ID NO. - FLD 152764767
 STATE (EMPLOYER) ID NO. - 59-2599751
 LAND AREA - 3.2 ACRES
 SITE INFORMATION - NEAREST COMMUNITY - SURROUNDING AREA
 NEAREST WATERWAY - 3 MILES S/SW
 NEAREST BUILDING - 200 FT EACH DIRECTION
 GROUNDWATER FLOW - SW
 NEAREST GROUNDWATER USE - NONE WITHIN 1 MILE
 PREVAILING WIND - WINTER NW TO SE - SUMMER EASTERLY
 LOCATION INFORMATION - INDUSTRIAL PARK LOCATION
 FLOOD INFORMATION - 100 YEAR FLOOD PLAN

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

LEGEND

----- PROCESS PIPING
 _____ SANITARY SEWER
 - - - - - STORM SEWER

VLASTIMIR W. DJORDJEVIC PROF. ENGR.
 6733 1ST AVE. SOUTH-ST. PETERSBURG, FL. 33707
 SCALE: 1"=30'
 DATE: DEC. 29, 1998
 PROJECT
 HOWCO ENVIRONMENTAL SERVICES
 843 43RD ST. SOUTH - ST. PETERSBURG FL.
 PROCESS & STORAGE EQUIPMENT PLAN D-8-1



GENERAL INFORMATION

FACILITY NAME - HOWCO ENVIRONMENTAL SERVICES
 LOCATION/MAILING ADDRESS - 843 43RD STREET SOUTH - ST. PETERSBURG, FL 33711
 TELEPHONES - (813) 323-0818 - (813) 327-8467 - 1-800-435-8467
 FAX - (813) 323-2249
 FACILITY EPA ID NO - FLD 152764787
 STATE (EMPLOYER) ID NO. - 59-2599751
 LAND AREA - 3.2 ACRES
 SITE INFORMATION - NEAREST COMMUNITY - SURROUNDING AREA
 NEAREST WATERWAY - 3 MILES S/SW
 NEAREST BUILDING - 200 FT EACH DIRECTION
 GROUNDWATER FLOW - SW
 NEAREST GROUNDWATER USE - NONE WITHIN 1 MILE
 PREVAILING WIND - WINTER NW TO SE - SUMMER EASTERLY
 LOCATION INFORMATION - INDUSTRIAL PARK LOCATION
 FLOOD INFORMATION - 100 YEAR FLOOD PLAN

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

FLORIDA DEPARTMENT OF
 ENVIRONMENTAL PROTECTION
 MAR 23 2005
 SOUTHWEST DISTRICT
 TAMPA

LEGEND

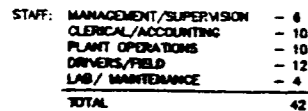
PROCESS PIPING
 SANITARY SEWER
 STORM SEWER

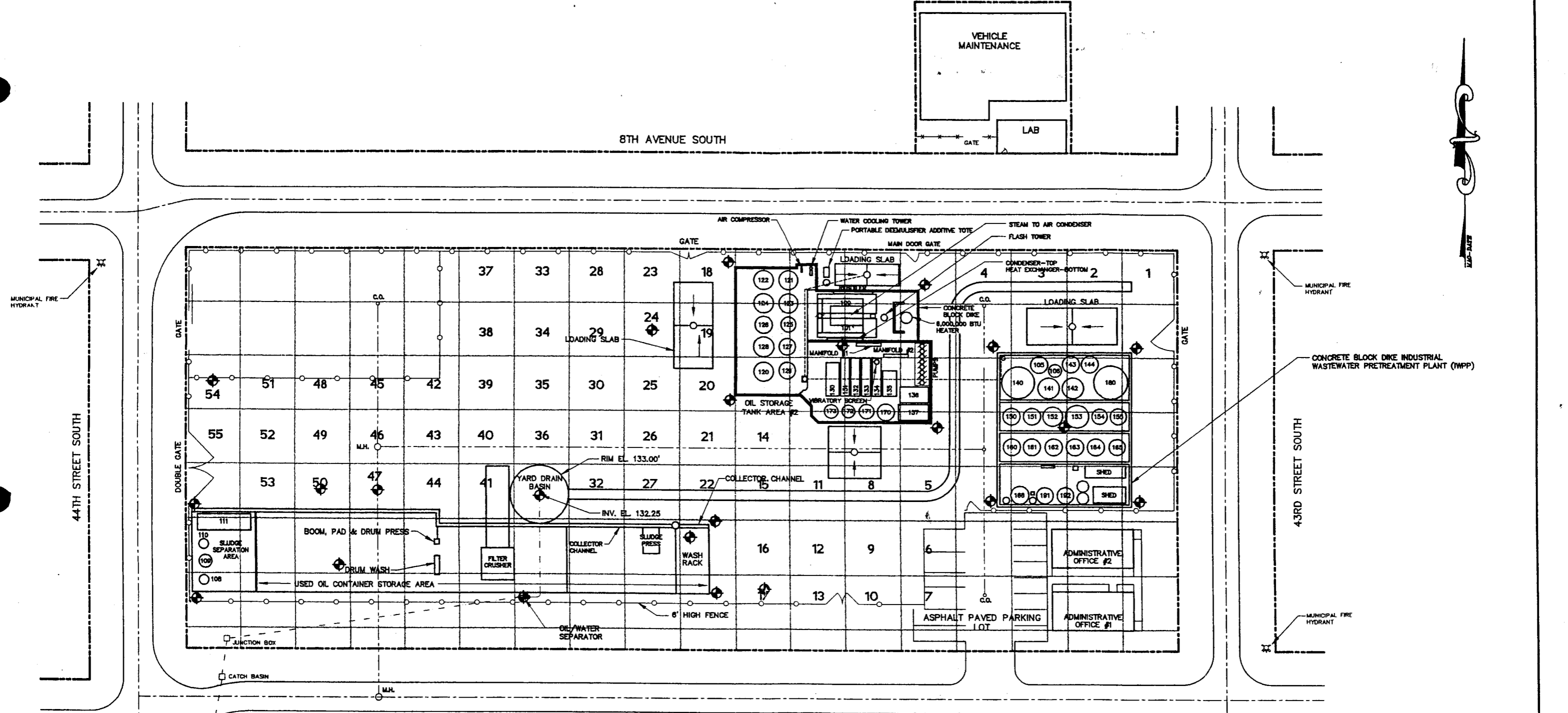
ROUTES OF EVACUATION

PRIME
 ALTERNATE

V. W. Djordjevic 10-19-1999

VLASTIMIR W. DJORDJEVIC PROF. ENGR. 8733 1ST AVE. SOUTH-ST. PETERSBURG, FL 33707		
SCALE: 1"=60'	PROJECT	DRAWN: G.C.R.
DATE: DEC. 29, 1998	HOWCO ENVIRONMENTAL SERVICES 843 43RD ST. SOUTH - ST. PETERSBURG FL.	
ESCAPE AND EVACUATION ROUTES		D-8-2





GENERAL INFORMATION

FACILITY NAME - HOWCO ENVIRONMENTAL SERVICES
 LOCATION/MAILING ADDRESS - 843 43RD STREET SOUTH - ST. PETERSBURG, FL 33711
 TELEPHONES - (813) 323-0818 - (813) 327-8467 - 1-800-435-8467
 FAX - (813) 323-2248
 FACILITY EPA ID NO - FLD 152784787
 STATE (EMPLOYER) ID NO. - 58-2599751
 LAND AREA - 3.2 ACRES
 SITE INFORMATION - NEAREST COMMUNITY - SURROUNDING AREA
 NEAREST WATERWAY - 3 MILES S/SW
 NEAREST BUILDING - 200 FT EACH DIRECTION
 GROUNDWATER FLOW - SW
 NEAREST GROUNDWATER USE - NONE WITHIN 1 MILE
 PREVAILING WIND - WINTER NW TO SE - SUMMER EASTERLY
 LOCATION INFORMATION - INDUSTRIAL PARK LOCATION
 FLOOD INFORMATION - 100 YEAR FLOOD PLAN

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

KEY:

SOIL SAMPLE LOCATION
 AT USED OIL FACILITY
 CLOSURE

RANDOM GRID NUMBERS

1 50
 2 54
 3 24
 4 47
 5 17

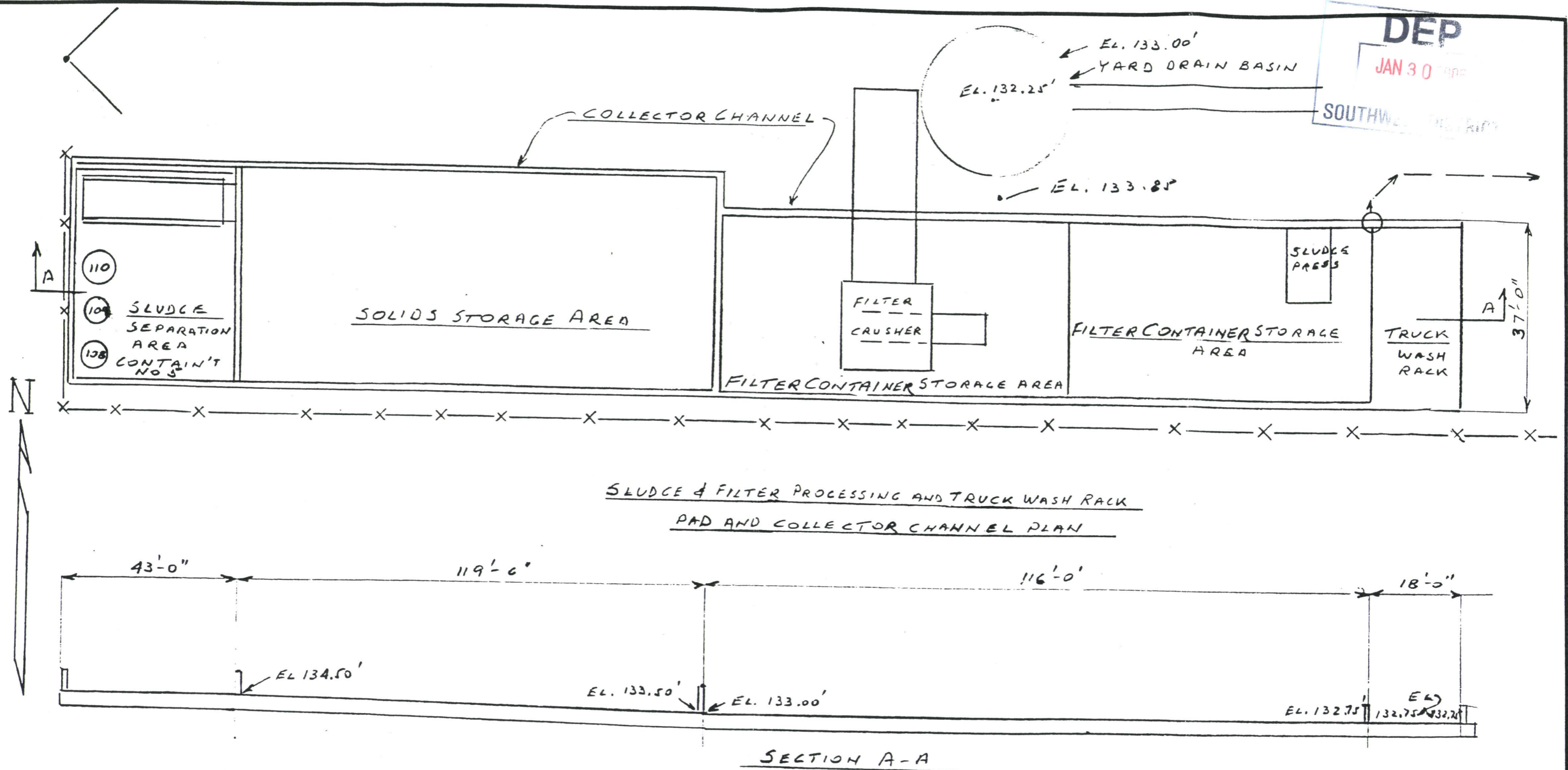
RANDOM GRID NUMBERS OBTAINED FROM APPENDIX D "SAMPLERS AND SAMPLING
 PROCEDURES FOR HAZARDOUS WASTE STEAMS" EPA - 800/2-80-018

LEGEND

PROCESS PIPING
 SANITARY SEWER
 STORM SEWER

Handwritten signature: J.W. Rudolph
 10-4-99

ENVIRONMENTAL, INC. 109 AZALEA POINT DRIVE SOUTH PONTE VEDRA BEACH, FLORIDA 32082		
SCALE: 1"=60'	DATE: DEC. 29, 1998	DRAWN: G.C.R.
PROJECT		
HOWCO ENVIRONMENTAL SERVICES 843 43RD ST. SOUTH - ST. PETERSBURG FL.		
USED OIL CLOSURE SAMPLING LOCATIONS		10-1



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

V.W. Djordjevic
10-15-1999

VLASTIMIR W. DJORDJEVIC PROF. ENGR. 6733 1ST. AVE. SOUTH - ST. PETERSBURG, FL. 33707		
SCALE: NTS.	APPROVED BY: PROJECT No.	DRAWN BY V.W. DJ.
DATE: 9-15-1999		REVISED
HOWCO ENVIRONMENTAL SERVICES LTD. 843 43RD ST. SOUTH - ST. PETERSBURG, FL.		
SOLIDS & FILTER PROCESSING AND TRUCK WASH RACK PAD AND COLLECTOR CHANNEL		DRAWING NUMBER 10-2