## FLORIDA STATE

## **DEPARTMENT OF ENVIRONMENTAL PROTECTION**

## Fax Cover Sheet

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DATE:	November 20, 1998		
TO:	Mr. Tim Hagan	PHONE:	727-327-8467
	HOWCO Environmental Services	FAX:	727-321-6213
FROM:	Roger Evans	PHONE:	813-744-6100
	Hazardous Waste Section	FAX:	813-744-6125
RE:	Used Oil Application Modified 4 <sup>TH</sup> Notice of Deficiency		

Number of pages including cover sheet: 6



### **Remarks:**

As discussed in our November 18, 1998, telephone conversation I am submitting the Department's additional comments on your application since you requested a cancellation of todays meeting. The additional comments are itialicized for your convenience.

The Department has agreed to your new submittal date of December 15, 1998.

Should you have any questions or comments please call me at (813) 744-6100, extension 388 or Al Gephart at extension 372.

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Transmit Confirmation Report

:	007	
:	9-3216213	
:	WASTE MGT	TAMPA SWDIST
:	Nov 20	98 16:15
:	04'20	
:	Norm	
:	06	
:	OK	
		: 007 : 9-3216213 : WASTE MGT : Nov 20 : 04'20 : Norm : 06 : DK

HOWCO Environmental Services Used Oil Processing Permit Application

October 9, 1998

#### Summary Of Issues:

Part II - Certification.

The Part II Certification is missing (P.E.)

Attachment 1. List of Drawings

#### The drawings provided are not legible. We understand that Howco will be providing CAD drawings.

- D-6-1 What does Process & Storage Equipment Plan represent and where is it located ?
- D-8-2 What is the difference between Escape & Evacuation Routes and "Reduced Print Of Escape & Evacuation Routes"? (Both are titles to D-8-2.)
- D-8-2 Plant Location Plan needs to be identified on a separate drawing number with the appropriate names as well as showing the relationship to other sites, etc.

20782-6TF-024 The facility is not depicted on the map (needs site location).

Howco may use multipurpose drawings. However, specific titles must be used on each drawing to indicate what the drawing represents, and each drawing inserted in the appropriate section of the application.

Attachment 2. A Brief Description Of Facility Operation.

Item 2.3 How and Where are solids disposed ?

Attachment 3. Detailed Process Description.

There is no detailed site map, nor is there a reference to one.

- Item 3.8 In the sampling plan for solids, the reference should be Table 4-3 page 4-5 not page 4-4.
- Item 3.11 Is permit #1030153-001-AO an air permit ? If so, why is this information inserted in the application under the Wastewater Treatment Plant heading ?
- Table 3-1Check Table 3-1 page 3-5. Table 3-1 shows the storage tank capacity within containment<br/>area 2 to be 251,100 gallons. Table 9-1 indicates that it is 227,640 gallons.
- Item 3.12 Please be more specific How is antifreeze treated in the Wastewater Treatment Plant ?

# Perchlorethylene and Tetrachlorethylene are synonyms for the same compound (CAS Number 127-18-4). Tetrachloroethylene is preferred (note spelling).

Attachment 4. Sampling & Analysis Plan.

Item 4.1.2 The third "bullet". EPA Method SW-846/8021B not "A".

Attachment 4. Sampling & Analysis Plan (Continued).

Item 4.2 The reference should be "See Table 4-4" not Attachment 4.

A procedure is not provided on using statistical analysis in Table 4-4 for determining processed oil product knowledge.

Item 4.2.1 The first two paragraphs seem similar if not redundant. The explanation of sampling procedure is inadequate, more explanation is required. Is one sample taken for each process tank per week? What is the average number of loads shipped off-site per week? How is the oil on the bottom of the oil tank inspected to check for free water?

The Department wants DAILY samples from each tank. Howco should document these samples in its daily operating log. This would assure outgoing oil is "on-spec".

At the end of the second paragraph replace the period with a colon or reference Table 4-1.

- Table 4-1
   The Flash Point procedure should be EPA 1010
- Item 4.4 The title of Item 4.4 should be, "Incoming Shipments Of Oily Wastes".

At the third "bullet", change "various petroleum and industrial sludges" to "various petroleum sludges". Also, check the other Sections of the application that deal with solid waste such as those in Attachment 5.

Item 4.4.2 Page 4-6 Re-word the first sentence. ".....may possibly be contaminated with other hazardous constituents."

Attachment 5. Solid Waste Handling.

Howco has failed to provide a response for the need for a solid waste permit.

The solid waste issues remain unresolved. If Howco mixes or blends any waste stream to solidify or stabilize for disposal it requires a solid waste permit. Also, if the material cannot go through Howco's processing system, it is solid waste and requires a solid waste permit.

The DEP prefers two permits; one for Used Oil and the second for Solid Waste. The Used-Oil permit will state that it does not cover solid waste issues and if conditions in the permit differ from what is stated in the application, the permit will take precedence.

- Item 5.2.2 Who/Where are the solid wastes from ? What Tanks ? What tank cleaning ? Specify the tanks (Howco's or off-site customer tanks). It appears that the tanks discussed in 5.2.1 are those of Howco but, those of 5.2.2 could be outside (off-site) tanks.
- Item 5.2.2.1 We suggest this Item be re-numbered 5.2.3.
- Item 5.3 As worded, it would allow petroleum contaminated soils to go to a landfill. Shipping the material to a thermal treatment plant would seem appropriate but not a landfill.
- Item 5.5.1 A better description of the "Cone" is needed and what materials are processed in the cone.

Howco needs to perform a waste determination on the petroleum contaminated solids and "other" solids coming into its facility.

Attachment 5. Solid Waste Handling (Continued).

Item 5.5.3 Solids generated from wastewater pre-treatment is another waste stream. This stream needs to be characterized. It is suggested that a characterization be done quarterly for the first year and thereafter, only if there is a process change.

Attachment 6. Tracking Plan.

Item 6.1 In the first paragraph, second sentence, remove the slash (/) and the word "or".

# Explain how the internal work order form meets the tracking and documentation requirement.

Item 6.2 The "bullets" after the first paragraph do not list all of the required information.

The "Requirements For Acceptance" is merely a citation of the federal regulation not Howco's commitments for tracking. These "requirements" should be reflected on Howco's Manifest/Invoice or the Nonhazardous Waste Manifest.

Re-word the first paragraph to "Howco will keep a record of each used oil shipment accepted for processing/refining. These records are identified in Table 6-1." (List specific documents that are being referenced). "Records for each shipment will include the following information:"

These requirements are to be reflected on Howco's Manifest/Invoice or non-hazardous waste manifest.

There are no references to the forms in Table 6-1.

The Requirements Of Deliveries section is merely a citation of the federal regulation. not Howco's commitments for recordkeeping.

Re-word last paragraph to, "The document will include analytical results of testing of used oils. These are maintained at the facility in hard copy and in the company database for three years. Records of all reportable incidents that would require the use of the Contingency Plan and an attached Incident Report Form will be included.

Item 6.3 Refer to 40 CFR 279.57. Re-word to pertain to Howco's facility.

The last paragraph is merely a citation of the federal regulation, not Howco's commitments for reporting (same comment as in items 6.1 and 6.2; change "should" to "will", etc.)

Attachment 7. Preparedness And Prevention Plan.

Item 7.1 Re-title Item 7.1 to, "Spill Control".

Take out the second and third sentences in paragraph one. Take out paragraph two.

- Item 7.2 The Department suggests deleting this Item and revising Item 7.3 to read "Equipment Available For Spill Control" and re-labeling it Item 7.2.
- Item 7.5 In the last two paragraphs, Form 8-3 is referenced. There is no Form 8-3 provided an there is no reference as to where the form can be found in the application. Is Howco referencing Table 7-6? Please cite a page number.
- Table 7-3
   Update the Incident Coordinators List and provide zip codes for addresses. Delete "Qualified Individual" title.

#### Attachment 8. Contingency Plan.

Item 8.1 What are these chemicals and where are they located ? *They cannot be identified on the referenced drawing.* 

Table 8-2The Table is incomplete. All of the information for the laboratory chemicalsis not provided.

Table 8-3 The Table is incomplete. All of the information for the shop materials isnot provided.

Item 8.3 What are these chemicals and where are they located on D-6-1? The areas are not delineated on D-6-1.

In the first paragraph, revise the last sentence to read "Chemical usage and storage areas where spills are likely to occur are located on the site map drawing D-6-1".

In the fourth "bullet", fourth sentence, re-word to state "Refer to the Incident Coordinators (Table 8-5) for home telephone numbers.

In the sixth "bullet", What is Section 6.0? Does Howco mean Item 8.2.5?

Item 8.8 Howco should post evacuation routes at the Lab, Administration Offices 1 and 2, the Operations Office, the Main Control Panel in the oil plant, Filter Press/Crusher and at the time clock. Copies are also to be available in the permit booklets in the plant office building.

In the last paragraph, what plan is being referenced? Also, the required amendments to the Contingency Plan are provided in 40 CFR 264.54.

 Table 8-5
 Update the Incident Coordinators List and provide zip codes for addresses. Remove the title "Qualified Individual".

Attachment 9. Unit Management Description.

Provide labeled drawings that identify the containment areas 1, 2 and 3 as identified within Tables 9-1 and 9-2. Please provide the calculations that were used to determine the containment volumes of areas 1, 2, and 3. All calculations shall be signed and sealed by an independent Professional Engineer registered in the State of Florida.

- Item 9.1 Third paragraph, the 74,800 gallons is the capacity of containment not the storage capacity of the nine tanks. The paragraph is confusing needs re-wording.
- Table 9-1The Table needs to be signed and sealed by a professional engineer registered in the State<br/>of Florida (see first note above).
- Table 9-2The Table needs to be signed and sealed by a professional engineer registered in the State<br/>of Florida. The Table does not include the two tanks containing chemicals and the 20-25<br/>drums of chemicals stored in the area (see Table 8-1).

Attachment 10. Closure.

# Item 10.1 Howco and FDEP need to discuss further, the issue of eligible and non-eligible areas and their pertinence to Closure in the application.

Attachment 10. Closure (Continued).

Item 10.2 At the fourth "bullet"; Howco has identified that the soil samples collected will be analyzed for parameters in 62.775, FAC. The objective of the sampling is to determine the extent of contamination, if any, not to determine if the petroleum contaminated soil meets pre-burn requirements.

Item 10.2.1 In reference to the "Note", see comment at Item 10.1 in regard to the eligible and non-eligible areas and their pertinence to Closure in the application.

The last note and set of "bullets" does not meet the sampling requested by the Department.

It is requested that Howco's sampling plan include the following:

- Five (5) soil samples in each of the tank farms;
- One (1) soil sample located at the stormwater drain;
- One (1) soil sample at the location of the oil/water separator (located outside the wall),
- Six (6) soil samples from the southwest portion of the facility
  - One (1) at each of the four corners
  - One (1) at the sump in the truck wash area
  - One (1) at the sludge drying bed

A statistically significant number of random soil samples covering the Howco facility site.

The location of all of the above samples must be identified on a site plan, inserted in the application.

In the first sentence, change "may" to "will".

# In the third paragraph, third sentence, re-word to, "If clean closure cannot be attained, Howco will submit a Post-Closure Plan for DEP approval.

Item 10.4 The Department questions the timeliness indicated in the closure schedule. The duration for each identified event should be referenced to the date upon initial closure (e.g. Decontaminate storage tanks and piping ----0 to 30 days after closure initiation).

Attachment 11. Employee Training Outline.

The training plan must provide the frequency of employee training.

#### Miscellaneous:

Throughout the narrative, Howco uses generalized terms (e.g. "<u>Used oil processors/refiners</u> must keep a record......") to describe procedures that they should implement (e.g. "The report <u>should</u> include the EPA Identification number....."). The permit application must be specific to Howco and descriptive of procedures that Howco will implement.

#### STATE OF FLORIDA DEPARTMENT OF ENVIRONMENTAL PROTECTION SOUTHWEST DISTRICT

#### CONVERSATION RECORD

:

Date 11-18-98	subject <u>Used</u> Oil Application
Time 3:20 pm	Permit No. 92465 - HOUG - 001
	County Pinellas
Mr. Tim Hagan	Telephone No. (727) 327-8467
Representing Howco Environ	imental Services
[ $X$ ] Phoned Me [] Was Called	[ ] Scheduled Meeting [ ] Unscheduled Meeting
Other Individuals Involved in Con	versation/Meeting
Al Gephart - FDEP	·
	a cancelation of our meeting and
Summary of Conversation/Meeting _	Nir Flagan requested an extension of time
to respond to the Department's	faxed submitted of Nov 12, 1998. He indicated
that he had retained Mr. Tim	Rudolph (Enviro Engineering) to complete
the application Mr. Rudolph	is fimilar with DEP paints and has completed
other used oil applications in	other districts. The time exknsion will give
his new consultant time to	re-work the application, respond to our comments,
and provide CAD drawings.	I indicated to Mr. Hagan that there was an
addendum to our comments	which we had planned to discuss at the meeting
of Nov 20th, I will fax the	ese additional comments to him. The
Department has agreed on a	a new submitted date of Dec 15, 1998.
	R. Brin
	Signature <u>Loger Waws</u>

22/98

## FLORIDA STATE

## **DEPARTMENT OF ENVIRONMENTAL PROTECTION**

## **Fax Cover Sheet**

DATE:	November 12, 1998			
то:	Mr. Tim Hagan, President HOWCO Environmental Se	PHONE: rvices	(727) 327-8467]	
	FAX: (727) 321-6213			
FROM:	Roger Evans Hazardous Waste Section	PHONE: FAX:	(813) 744-6100 (813) 744-6125	
RE:	E: Used Oil Processing Permit - Application			
Number of pages including cover sheet: 4				



#### Message

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The Department has completed its review of your permit application dated October 9, 1998. Several issues remain that are in need of resolution. As I discussed with you Monday, November 9, 1998, these issues must be resolved prior to the Department considering your application complete. The issues are outlined in the attached summary. Please be prepared to resolve these issues at our Friday, November 20, 1998 meeting.

If there are any questions or comments concerning the attached, please call me at (813) 744-6100, extension 388. Otherwise, we anticipate seeing you at our scheduled meeting November 20, 1998, at 9:00 a.m.

#### HOWCO Environmental Services

#### **Used Oil Processing Permit Application**

#### October 9, 1998

#### Summary Of Issues:

#### Part II - Certification.

The Part II Certification is missing (P.E.)

#### Attachment 1. List of Drawings

- D-6-1 What does Process & Storage Equipment Plan represent and where is it located ?
- D-8-2 What is the difference between Escape & Evacuation Routes and "Reduced Print Of Escape & Evacuation Routes" ?
- D-8-2 Plant Location Plan needs to be identified on a separate drawing number with the appropriate names as well as showing the relationship to other sites, etc.

20782-6TF-024 The facility is not depicted on the map.

#### Attachment 2. Brief Description Of Facility Operation.

Item 2.3 How and Where are solids disposed ?

#### Attachment 3. Detailed Process Description.

There is no detailed site map, nor is there a reference to one.

- Item 3.8 In the sampling plan for solids, the reference should be Table 4-3 page 4-5 not page 4-4.
- Item 3.11 Is permit #1030153-001-AO an air permit ? If so, why is this information inserted in the application under the Wastewater Treatment Plant heading ?
- Table 3-1Check Table 3-1 page 3-5. Table 3-1 shows the storage capacity in containment area 2<br/>to be 251,100 gallons. Table 9-1 indicates that it is 227,640 gallons.
- Item 3.12 Please be more specific How is antifreeze treated in the Wastewater Treatment Plant ?

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Item 4.1.2 The third "bullet". EPA Method SW-846/8021B not "A".

- Item 4.2. The reference should be "See Table 4-4" not Attachment 4.
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Attachment 4. Sampling & Analysis Plan (Continued).

Table 4-1The Flash Point procedure should be EPA 1010

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Item 5.2.2.1 We suggest this Item be re-numbered 5.2.3.

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The last paragraph is merely a citation of the federal regulation, not Howco's commitments for reporting.

Attachment 7. Preparedness And Prevention Plan.

- Item 7.2 Materials Dedicated To Spill Control. The Department suggests deleting this Item and revising Item 7.3 to read "Equipment Available For Spill Control" and re-labeling it Item 7.2.
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- Table 7-3
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- Item 10.2.1 The last note and set of "bullets" does not meet the sampling requested by the Department. It is requested that Howco's sampling plan include the following:
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A statistically significant number of random soil samples covering the Howco facility site.

The location of all of the above samples must be identified on a site plan, inserted in the application.

Item 10.4 The Department questions the timeliness indicated in the closure schedule. The duration for each identified event should be referenced to the date upon initial closure (e.g. Decontaminate storage tanks and piping ----0 to 30 days after closure initiation).

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The training plan must provide the frequency of employee training.



Transmit Confirmation Report

No.	:	013
Receiver	:	817273216213
Transmitter	:	WASTE MGT TAMPA SWDIST
Date	:	Nov 12 98 17:04
Time	:	02'49
Mode	:	Norm
Pages	:	04
Rešult	:	OK



October 7, 1998

Roger Evans Department of Environmental Protection Southwest District 3804 Coconut Palm Drive Tampa, FL 33619 D.E.P, OCT - 9 1998 SCUTHWEST DISTRICT

RE: Oil Permit Application

Dear Mr. Evans:

Enclosed you will find four copies of HOWCO'S used oil permit application. The two copies labeled "STRICKEN" are copies that include old text that has been revised or removed. The old or removed text is shown with a strikeout line through the text. Additionally, revised or new text within the "STRICKEN" copy is shown in highlighted form.

The two copies labeled "CLEAN" are the finished document with all stricken text removed and all highlighted text included as normal text with highlighting removed. This copy will be submitted as HOWCO'S most recent and updated application.

We would ask that the Department of Environmental Protection please use HOWCO'S "CLEAN" edition as a replacement of the previously submitted permit applications. Although the text has not changed substantially from our last submittal, we feel that it is becoming increasingly confusing and time consuming to continue to work from the original documents from September 1997.

Also enclosed, you will find our responses to the "Third Notice of Deficiencies." We have incorporated our responses within the text of both the "STRICKEN" and "CLEAN" editions of our permit application.

Sincerely,

Jupn Le Masten

Lynn LeMasters HOWCO Environmental Services

3701 Central Avenue – St. Petersburg, FL 33713 – Tel. 727-327-8467 Fax: 727-321-6213 Operations: Tampa Bay - Ocala - Ft. Myers – 24-Hour Emergency Access 1-800-435-8467 File 3-6 20/98



# HOWCO ENVIRONMENTAL SERVICES

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# THIRD NOTICE OF DEFICIENCY

**OCTOBER 9, 1998** 

#### Third Notice of Deficiency:

#### QUESTION:

Part 1-B-3

The Flood Insurance Rate Maps (125148-0027-B and 125148-0028-B) provided by Howco does not have sufficient information to demonstrate that the facility is not within the 100 year flood plain area. Please provide the panel of the map that identifies the area in which the facility is located. The facility's location should also be noted on the diagram.

Throughout the application Howco specifies that the used oil they process is recycled. Based on common usage the word "recycling" means reuse of the used oil. Since Howco is not reusing the used oil another term should be used throughout the application.

#### **RESPONSE:**

Part 1-B-3

Flood map – Copies have been made and will be included in the text. The term recycling has been approved by FDEP.

#### Attachment 3

#### **QUESTION:**

Item 3.8. The application must describe the sampling conducted on the facility generated solids prior to mixing with a solidification agent.

#### **RESPONSE:**

Item 3.8

Sampling plan for solids:

Solids samples will be taken annually by a plant technician or chemist. Each sample will be collected in an eight ounce glass jar using a scoop. The test results will be used to provide the base information for product

knowledge.

Note: Constituents to be sampled for are listed in Table 4-3 Page 4-4 of the permit application.

#### QUESTION:

Item 3.11. Describe what permit(s) or exemption(s) exclusion(s) is Howco operating under for the two air strippers.

#### **RESPONSE:**

Item 3.11. The facility is operating under a permit # 1030153-001-AO issued by the Florida Department of Environmental Protection under the provisions in Chapter 403 of the Florida Statutes and Florida Administrative Code 62-297 and 624. This permit expires October 13, 2000.

#### **QUESTION:**

Item 3.12.1. Halogen screening is insufficient as a prescreen for antifreeze destined for disposal. Antifreeze destined for disposal must be sampled and analyzed by the generator for contaminants of concern prior to customer pick-up by Howco.

#### **RESPONSE:**

Item 3.12.1

Antifreeze for disposal requires TCLP Metals and Volatiles (See Item 3.12).

#### Attachment 4

#### QUESTION:

Item 4.1.1. Describe in detail how a "composite sample" is obtained from multicompartmented vehicles.

#### **RESPONSE**:

Item 4.1.1

Core samples from multi-compartmental trucks are combined to obtain one sample to be tested. Samples are collected using a jukker and tested for total halogens.

#### **QUESTION:**

Item 4.1.2. The third bullet identifies an EPA Method 8021A which has been replaced by 8021B. Please make the appropriate change to the text.

Even if concentrations of halogenated solvents in used oil are below 100 ppm each, does not automatically provide the rebuttal in every instance. For example, a particular batch of used oil is known to be contaminated with "F-listed" solvent waste through generator knowledge. In that case, the mixture should be treated as hazardous waste and the rebuttal cannot be demonstrated. Revise the text to add that in addition to the 50 FR 49176 guidance, a case by case determination should be made.

#### **RESPONSE:**

Item 4.1.2

Rebuttable presumption, EPA Method SW-846 / 8021A. If result of Method 8021B shows concentrations of halogenated solvents, listed in 40 CFR 261, Appendix VIII, below 100 ppm each, 50 FR 49176.

The rebuttable presumption may not be possible if through generator knowledge prior to Howco pickup of waste the oil was knowingly mixed with a hazardous waste. The generator has an obligation to disclose any hazardous constituents known to be mixed with the oil.

#### QUESTION:

Item 4.2. Where and what is the statistical data analysis mentioned in this paragraph?

#### **RESPONSE**:

Item 4.2

The statistical analysis for processed oil product knowledge is located at the end of Attachment 4 in the original document.

Note: Attached are copies of statistical data for processed oil.

#### **QUESTION:**

Item 4.2.1. Please explain what is a discrete sample and a discrete composite as identified in the text. Is it equivalent to a grab sample? Please describe in more details the purpose of sampling, methods to be utilized and frequency of sampling.

#### **RESPONSE:**

Item 4.2.1

Grab samples are obtained from processed oil tanks, mixed with air agitation. Samples will be drawn from the top of the tank or from the sample line attached directly to the tank during the agitation process. The sample bottle (approximately one-half gallon) is delivered to the lab chemist for analysis. One sample a week is taken and analyzed from the processed oil tank produced on that day. Processed oils are analyzed for the following constituents.

The purpose of sampling is to continue to build statistical data for product knowledge. The analysis performed on the oil will follow the procedure set forth in Attachment 4 Item 4.2 Certification of Processed Oil. The Table 4-1 shows the acceptable limits for the oil to meet on specification criteria.

#### **QUESTION:**

Item 4.2.2. What is Method ASTM D93-85?

#### **RESPONSE:**

Item 4.2.2

ASTM D93-85 refers to the Pensky-Martens Closed Cup Flash Point Test. Referred to as the Method. See page 4-5.

#### **QUESTION:**

Item 4.4.1. The terms industrial solids and industrial cleaning are not specific enough as it may not include petroleum related waste.

#### **RESPONSE:**

Item 4.4.1

The term "industrial sludges" is used to describe solids found in oil water separators and car wash tanks and pits. Typically the sludges are going to be sands and miscellaneous debris in contact with oils or waters. Industrial cleaning is a term used for the purpose of cleaning tanks containing petroleum products for customers.

#### **QUESTION:**

Item 4.4.2. Is Howco proposing to perform a hazardous waste determination on a solid waste stream based solely on analyzing for TCLP metals and TCLP volatile organics?

#### **RESPONSE:**

Item 4.4.2

Additional testing may be required for solid wastes that through generator knowledge may possibly be contaminated from a specific source as applies to 40 CFR 261.30 Subpart D.

#### Attachment 5

#### NEED FOR SOLID WASTE PERMIT

The information submitted in Attachment 5 appears to indicate that Howco will be managing "oil solids products from customers." The management of the solid waste materials described do not seem to be intrinsically linked to, or a by-product of, a traditional used oil processing operation. Please refer to the Department's memorandum (enclosed) dated March 5, 1998 on this subject. Since these materials are solid wastes and are destined for disposal, and not recycling, they must be managed pursuant to a separate permit required by Chapter 62-701, FAC. Please indicate whether or not Howco intends to manage these solid waste materials. Although the used oil processing facility application may describe the management of these solid waste materials, the used oil permit which may be issued pursuant to Chapter 62-710, FAC., cannot authorize the management of these materials. If Howco elects to manage these solid waste materials, the Department's Solid Waste Section must be contacted concerning the solid waste permitting requirements for this activity.

#### QUESTION:

Item 5.5.4. The language included in your response needs to be incorporated into the application.

#### **RESPONSE**:

#### Item 5.5.4

(Insert language regarding liquids removed during pressing sludge returning to water plant.) Page 3 Second Notice of Deficiencies

Liquids removed during the water plant sludge pressing process are piped back to the pre-treatment plant for reprocessing.

#### QUESTION:

Item 5.4. Please explain what is meant by "Both parts of this facility are utilizing a concrete pad surrounded on three sides with block walls......"

#### RESPONSE:

Item 5.4

I do not locate that reference in the document possibly in the old document. (IE: Both Parts.)

#### Attachment 6

#### QUESTION:

The tracking plan as outlined does not comply with the requirements of 40 CFR 279.56. Please review the rules governing this section and amend the tracking plan accordingly.

#### **RESPONSE:**

40 CFR 279.56 Will be used as a reference for information to be included on the Manifest or Work Order (Include copy of Manifest Documents and Work Orders).

#### **Requirements for Acceptance:**

Used oil processors/refiners must keep a record of each used oil shipment accepted for processing/re-refining. These records may take the form of a log, invoice, manifest, bill of lading or other shipping documents. Records for each shipment must include the following information:

- The name and address of the transporter who delivered the used oil to the processor/re-refiner.
- The name and address of the generator or processor/re-refiner from whom the used oil was sent for processing/re-refining.
- The EPA identification number of the transporter who delivered the used oil to the processor/re-refiner.
- The EPA identification number (if applicable) of the generator or processor/re-refiner from whom the used oil was sent for processing /re-refining.
- The quantity of used oil accepted.
- The date of acceptance.

#### **Requirements of Deliveries:**

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

- The name and address of the transporter who delivers the used oil to the burner, processor/re-refiner or disposal facility.
- The name and address of the burner, processor/re-refiner or disposal facility who will receive the used oil.
- The EPA identification number of the transporter who delivers the used oil to the burner, processor/re-refiner or disposal facility.
- The EPA identification number of the burner, processor/re-refiner or disposal facility who will receive the used oil.
- The quantity of used oil shipped.
- The date of shipment

#### **QUESTION:**

Item 6.3. This section does not comply with the requirement of 40 CFR 279.52(a)(2). Please revise this section to include; (I) Records and results of used oil analyses performed; and (ii) Summary reports and details of all incidents that require implementation of the contingency plan as specified in 40 CFR 279.52(b).

#### **RESPONSE:**

Item 6.3

The document should include that analytical results of testing of used oils are maintain at the facility in hard copy and in the company database for three years. Records of all reportable incidents that would require use of the contingency plans. Incident Report Form should be included as an attachment.

The company will complete and forward to the regional administrator on a biennial basis by March 1 of each year activities for the previous year. The report should include the EPA Identification number, name and address of the processor, the calendar year covered by the report and the quantities of used oil accepted for processing and the manner in which the used oil is processed including the specific process employed.

#### Attachment 7

#### **QUESTION:**

Item 7.3. Your response did not address our comments. The application must describe the inspection, testing and maintenance of the emergency equipment.

#### **RESPONSE:**

Item 7.3

(Frequency of testing of emergency equipment) in the second notice of deficiencies page 7 line 1 we stated that pumps dedicated to spills are tested annually and stored adjacent to the storage trailer in the plant yard area. See attachment table 7-5 spill response equipment

#### EMERGENCY EQUIPMENT

- Safety showers
- Eye wash stations
- Fire Extinguishers
- Absorbent clays
- Absorbent booms and pads
- Hand tools

The safety showers, eye wash stations and fire extinguishers are tested on a monthly basis.

#### QUESTION:

Item 7.5. Form 7-6 could not be located. Please provide this form. Form 8-3 could not be located. Please provide this form.

#### **RESPONSE**:

Item 7.5

See Form 7-6 on page 7-3.

Form 8-3 is a letter to fire, police and hospital was not labeled in the previous edition.

#### QUESTION:

Item 7.3. This application should be specific in identifying the equipment that will be available for spill control. Please modify the language accordingly.

#### **RESPONSE:**

Item 7.3

See Item 7.2 (Materials Dedicated to spill control) page 7-2. Again there is no dedicated equipment.

#### QUESTION:

Table 7-3. The complete home address of the incident coordinators was not presented.

#### **RESPONSE**:

Table 7-3

#### Lynn LeMasters 10853 43<sup>rd</sup> Street North Villa #1103 St. Petersburg, FL 34622

Tim Hagan 3913 46<sup>th</sup> Avenue South St. Petersburg, FL 33711

#### QUESTION:

Table 7-4. The Florida Department of Environmental Regulations is now known as Florida Department of Environmental Protection.

#### **RESPONSE**:

Table 7-4

The Florida Department of Environmental Regulations has been changed in Table 7-4 to the Florida Department of Environmental Protection.

#### Attachment 8

The contingency plan should be designed to be a stand alone document and all references should be included within this section.

#### **RESPONSE:**

All references within Attachment 8 are now a part of Attachment 8 to make it a stand-alone document.

#### **QUESTION:**

Item 8.3. Please expand on what is meant by "All chemical usage areas where spills are likely to occur are found in the process and storage Equipment Location Plan."

#### **RESPONSE:**

Item 8.3

This is simply a reference to Drawing D-8-1 indicating location of chemicals and chemical tanks.

Note: Item 8.3 (paragraph 1 last sentence)

#### QUESTION:

Item 8.4. The last paragraph indicates that captured storm water from the property may be discharged into the storm sewer system. Please describe the precaution taken to insure that no contaminants flows off-site.

#### **RESPONSE:**

#### Item 8.4

Storm water falling on the property is channeled to a central collection area where it can be inspected prior to release into the storm drains. Prior to discharge into the storm drains it can be skimmed using oil adsorbent booms or pads to insure no sheen of oil is discharged. The water is discharged from the bottom of the water level as a precaution any sheen that might be present will float on top of the rain water. The sheen is typical of any paved parking lot or street with normal and expected motor vehicle traffic. The rain water then passes through a standard oil/water separator and finally enters the storm drain system.

Rain water falling within the containment areas are inspected prior to discharge. This water then is handled using the procedure listed above. The discharge valves are kept closed and the final valve is padlocked when not in use.

The oil/water separator is inspected for accumulated oil level as a part of the monthly visual inspection and cleaned as needed.

#### QUESTION:

Item 8.8. Copies of the evacuation routes should not only be kept in a book in the plant office but posted at strategic locations throughout the facility. Please include verbiage that describes where other copies will be located.

#### **RESPONSE**:

#### Item 8.8

Copies of the evacuation routes are kept in the permit booklets in the plant office building. The evacuation route will be posted at the time clock.

#### Attachment 9

#### QUESTION:

Item 9.1. The description of the storage tanks within the tank farm does not match Tables 9-1 and 9-2.

#### **RESPONSE:**

Item 9.1

The second paragraph on page 9-1 ("Twenty tanks numbered 105,160,140 through 145, should read 144.")

#### **QUESTION:**

Tables 9-1 and 9-2. Please provide drawings that identify the containment areas 1, 2 and 3 as identified within these tables. Please provide the calculations that were used to determine the containment volumes of areas 1, 2 and 3. All engineering drawings, specifications and calculations shall be signed and sealed by an independent Professional Engineer registered in the State of Florida.

#### **RESPONSE:**

Tables 9-1 and 9-2 have been recalculated and are included in the document.

#### **QUESTION:**

Item 9.4. Your response indicates that the piping system is all above ground and within secondary containment area, but the application does not mention any of this. Please clarify this inconsistency.

#### **RESPONSE:**

#### Item 9.4

Some piping is not above ground nor within containment. (Please refer to page 9-7, Item 9.4).

#### QUESTION:

Table 9-3. Please identify how the inspector will determine that the areas inspected (e.g., 'Trailer with product locked' to 'Drum inspection') are of satisfactory of unsatisfactory condition. The log should also include an area that records any corrective action taken or needed to be taken.

#### **RESPONSE:**

Table 9-3

The form has been modified to include areas for comments (Refer to Table 9-3). The inspector visually checks for locks on trailers and records his findings on the form.

#### Attachment 10

#### **QUESTION:**

Item 10.2.1. Please include the justification for the number of samples and the sample locations selected. A statistically significant number of random soil samples should also be selected as previously discussed with Mr. Bill Crawford.

The soil sampling need to address samples through the asphalt or concrete around the tank farms and processing areas.

#### RESPONSE:

Item 10.2.1

Note: Expand on eligibility or ineligibility of soil sampling as it applies to the ATRP Program. Soil sampling will be performed in the following areas:

- areas where underground piping exists
- containment areas
- sump trench area
- oil/water separator area
- car wash sump area
- storm drain collection area

#### QUESTION:

Item 10.4. The application needs to include an outline of the closure schedule activities to be performed by the facility. A response of "six months" to remove oil product and residues is not adequate.

#### **RESPONSE:**

Item 10.4

Closure schedule:

•

- Used oils processed and sold or removed (One month)
- Decontaminate storage tanks and piping (One month)
- Removal of tanks and piping
  - Soil sampled and analyzed
  - Oil water separator cleaned and closed
- Groundwater Analysis
- (As required)

(Two weeks)

(Three weeks)

(Three weeks)

- Contaminated Soil Removal & Disposal (As required)
- Final 40 CFR, Part 265.310, Closure Permit(As required)

#### Attachment\_11\_

#### QUESTION:

The discussion of the training requirements at Howco does not identify some of the main regulatory rules (i.e., Used Oil Regulations 40 CFR 279 and State Regulations 62-710 FAC) that the training program is intended to satisfy. The plan should also describe the records used to document employees training and how these records will be managed, who (job title) will retain the records, how long the records will be retained, frequency of training hours that will be provided, and formal aspects of the hands on training that provide the necessary training to the employees. This information must be included in the application.

#### **RESPONSE:**

Note: Howco has researched the regulations regarding training at a non-hazardous facility and are revising our training outline to include the following and has been merged it into the permit application.

#### ITEM 11.2 JOB SPECIFIC TRAINING

#### ITEM 11.2.1 TRAINING FOR DRIVERS

- 29 CFR 1910.1200 Hazardous Communication
- 29 CFR 1910.132 Personal Protective Equipment
- 49 CFR 390 399 DOT Regulations

#### ITEM 11.2.2 TRAINING FOR ENVIRONMENTAL TECHNICIANS

- 29 CFR 1910.120 (e) Hazwoper
- 29 CFR 1910.1200 Hazardous Communication
- 29 CFR 1910.132 Personal Protective Equipment
- 29 CFR 1910.120 (q) Emergency Responders (Awareness Level)
- 29 CFR 1910.146 Confined Space

#### ITEM 11.2.3 PLANT PERSONNEL AND LABORERS

- 29 CFR 1910.1200 Hazardous Communication
- 29 CFR 1910.132 Personal Protective Equipment
- 29 CFR 1910.120 (q) Emergency Responder (Awareness Level)

#### ITEM 11.2.4 OFFICE PERSONNEL PERFORMING SAMPLING AND SHIPPING

• 49 CFR 172.700 - 704 DOT Regulations

#### ITEM 11.2.5 EMERGENCY RESPONDERS

- 29 CFR 1910.120 (q) 24 Hour Technician Level
- 29 CFR 1910.1200 Hazardous Communication
- 29 CFR 1910.132 Personal Protective Equipment

FLORIDA	Env	Department of ironmental Pro	tection
Lawton Chiles Governor		Southwest District 3804 Coconut Palm Drive Tampa, Florida 33619	Virginia B. Wetherell Secretary
DATE:	9-21-9	8	
TIME:	1:30 pr	2	
SUBJECT:	Howco -	Discussion of 3rd No	otice of Deficiency
		<u>A T T E N D E E S</u>	
<u>_N</u> ;	ame	Affiliation	Telephone
Poger	Frans	FDEP	(813) 744-6100 × 388
Stanley	Tam	λί.	·· X-390
for GER	HART	FDEP	x-372
Kandy	Stravss	16	X 387
Jim OD	reque	FDEP	,' ×410
LYNNLE	MASTENS	Howes	(813) 327 - 8467
TIM HAG	9 m	(1	

"Protect, Conserve and Manage Fer dats Environment and Matura Personces"

File 3-b



September 14, 1998

Roger Evans Department of Environmental Protection Southwest District 3804 Coconut Palm Drive Tampa, FL 33619

RE: Third Notice of Deficiencies Discussion Meeting

I am confirming our meeting date and time at your office on September 21, 1998 at 1:30pm. Tim Hagan and myself will be there representing Howco Environmental Services for the purpose of discussion and resolution of deficiencies in our application for operating permits for our oil recycling facility.

We look forward to meeting with you and your staff to rapidly complete the permitting process.

Sincerely,

Marten

Lynn LeMasters Plant Manager

# **FAX TRANSMISSION**

HOWCO ENVIRONMENTAL SERVICES 3701 Central Avenue St. Petersburg, FL 33713 (813) 328-2410 Ext. 228 Fax: (813) 323-2249

To:	ROGER EVANS	Date:		-15-98	
Company:	FDEP	••••		an - 1- 1- 1 - 1 - 1 - 1 - 1 - 1 - 1 - 1	
Fax #:	744-6125	Pages:	<u> </u>	ncluding this cover sh	ieet.
From:	Tim Hagan ZSZ President/CEO				
Subject:	SEPT. 21, 19	78 (	1.1.30 pm	Meeting	
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Sep. 15 1998 01:38PM P2



September 14, 1998

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We look forward to meeting with you and your staff to rapidly complete the permitting process.

Sincerely,

Le Maaten Lynn LeMasters

Lynn LeMasters Plant Manager



September 10, 1998

Roger Evans Department of Environmental Protection Southwest District 3804 Coconut Palm Drive Tampa, FL 33619

RE: Oil Permit Application

Dear Mr. Evans:

It has become apparent that a completed document will not be possible within the forty-five day period. Therefore, we respectfully request an extension until October 9, 1998 as per our telephone conversation today.

We have tentatively agreed to meet and discuss your request for additional information on or about September 25, 1998 in your office.

We thank you for your understanding, previous assistance and guidance in preparation of our Operating Permit Application.

Sincerely,

Lmartan

Lynn LeMasters Plant Manager

LL/jh

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# FAX TRANSMISSION

HOWCO ENVIRONMENTAL SERVICES 3701 Central Avenue St. Petersburg, FL 33713 (813) 328-2410 Ext. 226 Fax: (813) 323-2249

To:	Rager Elans	Date:	9-10-98
Company:	FDEP		
Fax #:	144-6125	Pages:	including this cover sheet.
From:	Tim Hagan LSL, President/CEO		
Subject:	Permit Appl.		
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September 10, 1998

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We thank you for your understanding, previous assistance and guidance in preparation of our Operating Permit Application.

Sincerely,

John & Master

Lynn LeMasters Plant Manager

LL/jh

September 10, 1998



mental Services

Roger Evans Department of Environmental Protection Southwest District 3804 Coconut Palm Drive Tampa, FL 33619

RE: Oil Permit Application

Dear Mr. Evans:

It has become apparent that a completed document will not be possible within the forty-five day period. Therefore, we respectfully request an extension until September 30, 1998 in order to respond to your request for additional information.

We thank you for your understanding, previous assistance and guidance in preparation of our Operating Permit Application.

Sincerely,

and Martin

Lynn LeMasters Plant Manager

LL/jh

#### A. General Information

1. New X Renewal Modification Date old permit expires

#### **RESPONSE:** Part I-A 1

Two locations were checked as applicable. The renewal location should be left empty.

#### Part I B.3

The map indicating the location of the 100-year flood plan could not be located. A topographic map depicting the location of the 100-year flood plan, and the source of the information must be included in the application.

### RESPONSE: (TOPOGRAPHIC MAP IS LOCATED IN THE BACK COVER OF THE PERMIT APPLICATION BOOKLET, DRAWING (20782-6-TF-024). Part I B.3

The topographic map depicting the 100 year flood plan is published by the Federal Emergency Agency, Telephone No. 1-800-358-9616. A copy of the section where our plant is located is enclosed. See Attachment - 100 Year Flood Plan.

#### Part I-C.4 (Attachment 3)

The application does not discuss the generation, capture of reuse of the off-gasses generated during the distillation process. This information should be included in this application, and the application should describe how this information is presented to the FDEP air section. The detail description of the process has been rewritten and the relationship to previously submitted information (which describes processing based on weight percentage water) is not clear. The application must describe the management of each separate stream.

#### RESPONSE: (*REFER TO ITEM 3.6.1*)

Part I-C.4 (Attachment 3)

The off gasses released as a result of the separation of water from oil are captured and piped to an air to steam condenser where the gasses are re-condensed. The condensed vapor gravity flows through piping 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 as he pumps the condensate from either the bottom or top from of the condensate holding tank. Vented gases from the condensate storage tank are filtered through a filter container of activated carbon media and vented to the atmosphere. Color cut paste can be used for a higher degree of accuracy if needed. The water is pulled out to Howco's untreated water storage tanks awaiting pre-treatment. The light ends are pulled off and blended into processed oil tanks during the batching process.

Item 3.8 and 5.2. The application has been revised to include a general description of the management of the solids generated by SWECO oil/solid separator. The description does not provide sufficient details on the processing, solidification and disposal of these solids.

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HOWCO Environmental Services December 4, 1997 Page 3 Revised Dec. 16, 97

sampling and testing prior to off-loading. The liquids are distributed into tanks according to the contents for recycling.

#### RESPONSE: (*REFER TO ITEM 5.5.4*)

Item 5.5.4

Liquids removed during the water plant sludge pressing process are piped and pumped back to the
 pre-treatment plant for reprocessing.

Item 2.3 This item references a sludge processing facility. This facility was not identified on the site plan. Is this facility the sludge drying bed? The description does not match previous descriptions provided during meeting and site visits. Additionally, the process associated with the sludge drying bed should be described. The management of all waste streams should be identified.

RESPONSE: (REFER TO ITEM 5.4)

Item 2.3

The sludge processing facility consists of the sludge drying bed, the sludge press and decanting cone tank all located on the site map. A donut shaped earthen dike is used to contain sludge after removal of liquids. The earth and sludge are mixed together to form a drier and more stable mixture. Samples are drawn for any required analysis. Upon approval the mixture is loaded into trucks and shipped for disposal. Both parts of this facility are utilizing a concrete pad surrounded on three sides with block walls and on the North side by a drainage trench. The trench is used to intercept liquids from sludge press as well as from the drying bed. Refer to Attachment 3 Item 3.1 for processing waste and Attachment 5 Item 5.2, for more details.

#### Item 2.4. The application should describe how the oil from the compacted filters is recovered.

#### RESPONSE: (*REFER TO ITEM 2.4*)

Item 2.4

The oil filter crushing unit is fitted with a sealed drip pan to catch and hold oils extracted during the crushing process. This oil is pumped from the drip pan using a permanently mounted pump into storage tank adjacent to the crusher. The oil in the tank is then removed using a truck and transported to the oil plant receiving area for sampling and testing prior to being off-loaded into the receiving tanks.

#### Attachment 4 (Waste Analysis Plan)

The plan presented indicates that product knowledge will be used to make the on or off specification determination. Additionally, statistical analysis is described as the basis for using product knowledge. Please revise the plan to include periodic discrete tank sampling to validate the statistical basis.

RESPONSE: (REFER TO ATTACHMENT 4, STATISTICAL DATA ANALYSIS OF

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HOWCO Environmental Services December 4, 1997 Page 4 Revised Dec. 16, 97

# PROCESSED OIL)

# Attachment 4 (*REFER TO ITEM 4.2.1*)

Periodic discrete sampling and analysis is performed on a processed oil tank once per week. The tank is filled with process oil from the processing tank, then mixed and a sample drawn from the attached sample line on the bottom of the processed oil tank. The sample is then sent to laboratory for testing. The results of the processed oil analysis are fed into our database for statistical comparison to further substantiate the use of product knowledge.

1. The application must include an example of the Waste Material Profile Sheet (Mentioned in item 3.1.1) The description of pre-qualification procedures (Item 3.1.1) indicates that a Waste Material Profile Sheet will be obtained for each waste stream. Item 3.1.2 indicates that the submittal of the Waste Material Profile Sheet is one of three methods of pre-qualifying a shipment. The application should be revised to eliminate this inconsistency. The application should also discuss the retention of this information.

2. The description of driver responsibilities (page 3-1 Item 3.2) at the customer does not include the actions the driver will take should any test indicate the presence of unacceptable halogen contamination. (*REFER TO ITEM 3.1*)

# (THIS RESPONSE IS TO BE MOVED TO ATTACHMENT 5 ITEM 5.1)

# 1. RESPONSE: (SEE ENCLOSED COPY OF WASTE PRÓFILE SHEET AT IN OF DOCUMENTS)

The process begins with Pre-qualification prior to arrival at the facility. Generators are required to pre-qualify their shipments. This can be effected in one of four ways:

- 1. By submitting a non-hazardous determination from a independent certified lab.
- 2. By forwarding a sample of the material to HOWCO's laboratory for for nonhazardous determination.
- 3. By submittal of a signed Waste Material Profile Sheet.
- 4. By submitting a material safety data sheet (MSDS) on virgin material only.

Copies of these documents are kept on file in the sales department for a minimum of three years.

#### RESPONSE: (*REFER TO ITEM 5.1*)

Item 3.1.2 Once the determination has been made regarding acceptance of the material, HOWCO will assign a Manifest number identifying the waste stream and the generator. \*\*See enclosed copy of the HOWCO manifest. HOWCO Environmental Services December 4, 1997 Page 5 Revised Dec. 16, 97

2. Used oil is tested before collection. A Halogen leak detector (sniffer) is used to pre-screen the used oil. If the sniffer indicates the presence of halogenated compounds above 900 ppm a Halogen test (EPA Method 9077) will be performed. Should Halogen test indicate the presence of halogenated compounds over 1000 ppm, the used oil will not be collected. If the used oil is less than 1000 ppm the used oil will be collected by the driver.

Item 3.1.3 indicates that a manifest number is assigned to a generator and waste stream once a determination of acceptance is made. The application does not specify the actions to be taken for acceptance or rejection, and should be revised to indicate the actions taken by Howco. The application should describe what document is used to record movement of the used oil from the generator to the processing facility. The application should include an example of the transportation document, and how this document is managed.

#### RESPONSE: (REFER TO ITEM 4.4.2 TABLE 4-3)

Acceptance or rejection of any waste, other than used oil and petroleum contact water, is based on the criteria as indicated in ATTACHMENT 4, sub E, table 3. (SEE ATTACHMENT - TABLE 3) Results of analysis, showing any constituent equal to or over the allowable level, indicates that the waste can not be accepted.

#### Attachment 5 (Solids and Sludge Management)

# This plan must include a more detailed descriptions of the processes and equipment used and details of the disposal of all waste streams. (§279.59).

#### RESPONSE: (REFER TO ITEM 3.8 AND 5.2)

#### Item 5.2

Used oils received at the HOWCO processing facility contains suspended solids that are removed during the recycling process. Various petroleum sludge and dirt are filtered out of the used oil by the use of a vibrating fine mesh screen. The vibrating screen is designed to discharge the solids residue into a drum adjacent to the vibrating unit. Solids and oil that are removed by the vibrating screen are held in the drum until such time as the drum requires emptying. A vacuum truck will deposit oil and solids into a decanting tank for final separation, treatment and eventual disposal.

#### RESPONSE: (REFER TO ITEM 5.3)

HOWCO receives a variety of petroleum contaminated products from its customers. HOWCO accepts sludges in truck loads, drums and vacuum trucks. Petroleum sludges, petroleum impacted soils and used absorbent materials are processed for disposal similarly. If applicable to the product, further decanting is done to recover any free oils available for recycling. The solids which do not require further decanting or if decanting is not possible due to the consistency of the product, the solids are then mixed with solidification agents for drying and further processing through thermal remediation or shipped to landfill. The remaining solids and sludges are mixed with a solidification agent and allowed to dry. Upon completion of the drying the solids are loaded into trucks and transported to a landfill facility or thermal remediation facility. The equipment used in this process: Front End Loader, Vacuum Truck, hoses and hand tools.

Meeds turkness info:

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HOWCO Environmental Services December 4, 1997 Page 6 Revised Dec. 16, 97

# **Attachment 6 (Tracking)**

Item 6.2 The application states that an original and two copies of the manifest document will be made. The distribution of the copies indicates that 4 copies are made. The application should be revised to be consistent. Additionally, the application states that copy 2 will be given to the generator. The application should justify the retention of the original by Howco.

RESPONSE: Attachment 6 (*REFER TO ITEM 6.2*)

- A Howco representative signs and dates the manifest and/or bill of lading to certify that the material describe on the manifest and/or bill of lading has been received This is the point where Howco takes control of the material described on the manifest.
- Original and copy #2 are forwarded to Accounting.
- Copy #1 is left with the generator.
- Copy #3 is given to the Transportation Department.
- Copy #4 is kept by the driver and turned in at the end of the work day to the Transportation Department.

There is not a requirement that dictates the distribution of the manifest document or copy of the manifest. HOWCO made a business decision to retain the original manifest document.

#### **Attachment 7 (Preparedness and Prevention)**

 $h_{0}+answired$  1. The inspection, testing and maintenance of the emergency equipment are not discussed.

2. Access to communication devices at all times is not discussed.

3. Arrangements with local authorities are incomplete.

4. The application must describe the actions Howco has taken to familiarize local authorities with the facility and its preparedness, prevention and emergency response procedures.

5. The description must include how the facility will manage the records of this familiarization.

#### RESPONSE: Attachment 7 (REFER TO ITEM 7.3)

1. The pumps dedicated to spill containment are tested annually and stored adjacent to the storage trailer in the plant yard area. See Attachment - Table 7-5 Spill Response Equipment.

2. (*REFER TO ITEM 7.5*) Communication devices available to employees involved in spill containment are two-way radios, telephones and direct communications. A loud speaker is also available to page workers from any telephone. The plant emergency alarm is available to issue the evacuation orders if needed.

3.(*REFER TO ITEM 7.5*) Orientations are given at the request of the Fire Department for new firemen. This keeps the department employees familiar with our facility.

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HOWCO Environmental Services December 4, 1997 Page 7 Revised Dec. 16, 97

4. (*REFER TO ITEM 7.5*) Copies of the HOWCO SPCC plan has been distributed to fire, police, and hospitals. This SPCC will be revised to reflect the process and procedure changes included in this application and redistributed. Updated distribution lists will be documented in HOWCO company files.

5. (*REFER TO ITEM 7.5*) Orientation forms will be kept in the permit book to document this familiarization.

Specific questions on items related to facility preparedness and prevention are identified below:

Item 7.1 The application must identify the schedule for the upgrading of the containment systems for the tank systems.

#### RESPONSE: (*REFER TO ITEM 7.1*)

HOWCO is working with FDEP to schedule the required upgrading. HOWCO has proposed a schedule for the upgrading of the containment system to FDEP and we are awaiting the department reply.

Are drivers required to be present when loading and unloading trucks and/or containers? What type of communication is available to the drivers during unloading and loading operations? Are loading or unloading operations conducted with only the driver present at the facility?

#### **RESPONSE:**

Item 7.1.1 (*REFER TO ITEM 7.5*)

The drivers may not always be present during the unloading process, although no products are unloaded unsupervised. Plant Operators supervise the unloading process with direct communication available during this process.

Item 8.5.9 As described, the only incident requiring a written report would be a release of oily material that leaves the property. The reporting requirements of 62-710 FAC, 62-762 FAC, and 40 CFR 279 should be reviewed to determine when a spill or release must be reported, and the application revised as necessary.

RESPONSE: (Line 4) (*REFER TO ITEM 8.6.1*) Release of used oil requiring written notification.

Written Notification:

- 1. Spills of used oil of any amount in any body of water
- 2. Spills of used oil on any pervious surface of 25 gallons or more.
- 3. Spills of used oil in secondary containment on an impervious surface of 500 gallons or more.

#### (REFER TO ITEM 8.6.2)

Steps to take immediately after release of used oil or other hazardous materials:

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HOWCO Environmental Services December 4, 1997 Page 8 Revised Dec. 16, 97

- 1.Stop release as soon as possible.
- 2. Contain the release with absorbent materials.
- 3.Clean up spill and any residue and store in DOT approved containers.
- 4.Dispose of used absorbent material and all released hazardous materials at an approved disposal/recycle facility.

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Notify State and Local agencies as required by 49 CFR 171.16

#### **Attachment 8 (Contingency Plan)**

The contingency plan as presented does not include all the information requested in the instructions for completion of the application. The information not identified ans specific questions of the information in the contingency plan are identified in the following comments. The item numbers are references to the instructions for completion of the application form.

Item 7.a The application only presents the specific actions to be taken by the Incident Commander in response to fire and explosions. Action to be taken by other employees must be included.

RESPONSE: (*REFER TO ITEM 8.3*)

Item 7.a

In addition to the Incident Commander the Operating Personnel will under the direction of the Incident Commander, place and position the absorbent booms and pads in strategic points to contain spills as needed. Response team members will also operate pumps and man hoses to further contain or capture spills. Team members will perform other assigned tasks needed as directed by the Incident Commander.

#### Item 7.b The description of the emergency response arrangements is not presented.

#### RESPONSE: (*REFER TO FORM LETTER AT END OF PERMIT*) Item 7.b

HOWCO has notified the fire and police departments and local hospitals of the hazards present at the facility. Each one of these agencies have been given copies of our SPCC Plan for review to familiarize them with our plan for emergency response to fire or spills. The fire department has visited several times to familiarize new firemen with our facility. Orientations can be given upon request. HOWCO has formulated an agreement with the outside agencies to assist during

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HOWCO has distributed and requested each agency to acknowledge by signature that they will be available to assist in the event of an emergency. See accompanying acknowledgment form 8-3. Documentation of these arrangements will be maintained in HOWCO's corporate files.

#### Item 7.c The qualifications of the emergency response coordinator are not present.

#### RESPONSE: (*REFER TO TABLE 7-2*)

Item 7.c

In order to serve as the emergency response coordinator the candidate should be familiar with:

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HOWCO Environmental Services December 4, 1997 Page 9 Revised Dec. 16, 97

- 1. Plant layout
- 2. Combustible liquid handling
- 3. Ability to respond in timely fashion to emergencies
- 4. Familiar with emergency equipment Listed: Table 7.5

5. Familiar with HOWCO's SPCC Plan

Item 7.e The plan includes a list of equipment available during an emergency, but does not describe the capabilities of the equipment nor is the location of the spill response equipment identified on a facility map.

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RESPONSE: (REFER TO TABLE 7-5) Item 7.e See Table 7-5 - Equipment available for spill control.

Item 7.f The location of tanks and containers specifically dedicated for the storage of spill or released materials is not identified.

RESPONSE: (REFER TO ITEM 7.3)

Item 7.f

There are no specific tanks or containers dedicated to spill containment. Any or all tanks can be available to contain spills including all available tankers, Howco owned recovery trucks and vacuum trucks.

#### Item 7.h The application does not indicate that the evacuation routes are posted in the plant and should be revised to indicate where copies of the evacuation routes will be posted.

RESPONSE: (REFER TO ITEM 8.8)

Item 7.h

Copies of the evacuation routes are kept in the permit booklets in the plant office building A copy of this plan will be kept at the plant manager's office at the facility. Conditions that may require modification of the plan include: upgrades to equipment, other services provided to HOWCO customers, should part of the plan fail.

#### This plan does not specify where copies of the plan will be maintained at the facility, and does not describe the conditions that will require modifications of the plan.

#### RESPONSE: (REFER TO ITEM 8.8)

A copy of this plan will be kept at the plant managers office at the facility. Conditions that may require modification of the plan include upgrades to equipment, facility, and other services provided to HOWCO customers.

Attachment 9 (Unit Management) **Containers** 

The application (Item 3.3) mentions the receipt of drums. The application does not describe,

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HOWCO Environmental Services December 4, 1997 Page 10 Revised Dec. 16, 97

nor clearly indicate on a facility map, the location of the container storage area. This description should include details of construction, engineering drawing with cross section, and the features that make the area impervious to water and used oil.

#### RESPONSE: (REFER TO ITEM 9.2)

The facility map (8-1) has been revised to indicate the <u>drum processing area</u> which consists of two parts, one, a slab south of collector channel constructed of reinforced concrete and the other north of the collector channel paved with concrete and covered with asphalt used as a staging area for handling arriving drums and other solid waste prior to unloading filters into crushing machine.

There are no existing engineering drawings available for the construction of this facility. This area has secondary containment on drawings identified as collector channels with a sump pump. All solids, and water are gravity drained to the collector channel and then returned into the water/oil processing facility by the sump pump. This area is one of the areas that HOWCO and FDEP are working together on a schedule for installation of an impervious coating.

The application does not include the inspection checklist used to inspect the container storage area(s), and record any corrective action taken or needed to be taken.

# RESPONSE: (REFER TO TABLE 9-3)

Checklist sof completed inspection forms including maintenance items are stored in the files in the Plant Manager's office available for inspection.

Tanks (Item 9.1).

Table 9-1 identifies the tanks at the facility, but does not provide the materials of construction or construction specifications. The application must describe he aspects of the tanks that demonstrate how the tanks comply with the requirements of 62-762.500(3) (d), (e) and (f) FAC.

# RESPONSE: (REFER TO ITEM 9.3)

All storage tanks are fabricated from carbon steel plates welded with butt or lap welds with a number of tanks with riveted connections. Construction specifications are not available since all tanks have been purchased as used equipment. All tanks are erected in secondary containment on concrete foundations. None of the tanks required cathodic protection for tank bottoms. All tanks are exteriorly coated. Tank gauging is performed on a daily basis or after any additions or deletion of liquid movements in the tanks.

The application must describe the piping system and how it complies with 62-762.500(4) FAC. The application must describe the secondary system and how it complies with 62-762.500(6) FAC. The application must describe the tank maintenance procedures and how repairs will be made in accordance with 62-762.700 FAC.

RESPONSE: (*REFER TO ITEM 9.4*)

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Area not clearly defined on map

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HOWCO Environmental Services December 4, 1997 Page 11 Revised Dec. 16, 97

This language was left off in epplication :

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Piping system consists of steel pipes with welded joints all above ground and within secondary containment area. Since piping installations are not in contact with soil, no cathodic protection is required.

The inspection plan presented on page 9.3 is a conceptual view of the inspection program for the facility. The inspection plan should include the forms used by the inspectors. The inspection forms should include any observations made during the inspection and the actions necessary to correct deficiencies detected during the inspection.

RESPONSE: (*REFER TO TABLE 9-3*)

Item 9.3

(Include a copy of monthly tank inspection document)

The application must describe the management of rain water that accumulates in the secondary containment areas at the facility.

#### RESPONSE: (*REFER TO ITEM 8.4*)

Attachment 9 Item 9.1.1

Rain water that is collected in the containment area is pumped by sump pumps into the storm water storage tank. Storm water captured can be used in one of two ways:

1. Controlled discharge to the storm system.

Storm water is discharged to the storm system when the storm water tank attains approximately 70% full, the pressure of the water forces the storm water on the bottom of the tank through a pipe loop out into the yard. The rain water is routed to the center of the facility and then through a boomed swale and subsequent oil/water separator prior to release into the storm drain system.

2. Used and treated in the pre-treatment plant. Insert statement...

Attachment 10 (Closure Plan)

The application did not describe the sampling to be conducted to document that decontamination of the unit management areas had been successful. The description should include specific sampling methods, sampling parameters, and analytical methods. The discussion of samples and sample location could be summarized in table form to ensure that the specific samples identified are all described. (*REFER TO ITEM 10.2 FOR RESPONSE*)

The disposal of solids generated during the closure was not discussed in the closure plan. (REFER TO ITEM 10.2 AND 5.3 FOR RESPONSE)

The closure plan discusses the taking of soil samples form location of visual soil staining at the facility. The application must include a discussion of mandatory soil sampling and contingent groundwater sampling. The plan should also include any additional actions the facility will

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HOWCO Environmental Services December 4, 1997 Page 12 Revised Dec. 16, 97

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# take should contamination soils or groundwater be identified during the sampling. (REFER TO ITEM 10.2.1 FOR RESPONSE)

Sampling of the below listed areas will be performed in accordance with S-W-846, or current sampling methods.

Soil samples will be analyzed for EPA Method 8260, 8270, TRPH (9073) and TCLP metals. Arsenic, Cadmium, Chromium, and Lead.

Groundwater will be sampled for EPA Method 624 (8260), 625 (8270), TRPH (418.1). 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 ATRP eligible petroleum contamination from existing used oil contamination.

Should soil samples found to be 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 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. If all contaminated soil cannot be practically removed at closure or if closure cannot be accomplished on the used oil processing and storage tank area, a Contingent Closure Plan will be implemented. This plan will respond to those areas and elements where clean closure could not be accomplished.

Soil Sampling

Six soil samples will be collected around the containment areas of the used oil storage and processing tanks, including two samples on the east side, two samples on the west side, and two samples on the south side near the receiving area. Additional samples will be collected at the storm water drain area, oil water separator and the sump in the truck wash area. Soil samples will be collected and analyzed for the above listed parameters. Samples will be taken at six inches and another sample will be taken at eighteen inches below ground surface at each sampling location. The soil will be analyzed, as set forth above to differentiate any ATRP eligible petroleum contamination for existing used oil contamination.

#### Solids Generated at Closure

The disposal of solids generated during the closure are the same as residue discussed in the closure Attachment 10 Item 10.3, Decontamination. For the purpose of closure, residue, and solids are one and the same.

Training

The training plan for the facility could not be located, and must be included as a portion of the application. (*REFER TO ATTACHMENT 11 FOR THE TRAINING SECTION*)

HOWCO Environmental Services December 4, 1997 Page 13 Revised Dec. 16, 97

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# **ATTACHMENT 11**

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# **EMPLOYEE TRAINING OUTLINE**

# ITEM 1 PURPOSE

To instruct and inform employees in the areas of:

- daily plant operation
- the use of equipment
- product handling
- familiarity with state and federal rules and regulations
- personal safety and emergency procedures and response equipment
- the safe and efficient management of assets and equipment including hazardous materials and wastes.

The following preliminary training modules were designed to meet regulations as described in references listed below.

#### ITEM 2 REFERENCES

- 40 CFR Part 262
- 49 CFR Part 172 Subpart H
- 29 CFR 1910.120
- 29 CFR 1910.1200
- Florida Used Oil Transporter's Certification Manual
- Federal Motor Safety Regulations
- North American Emergency Response Guidebook

#### ITEM 3 GENERAL INTRODUCTION

The following outline will be given to all new employees during their probation period. Employees assigned to a new position will receive job classification specific training, according to the position.

Introduction - Safety Procedures

- 1. Employee obligations
  - a. Safety procedures in plant including sampling and measuring content in storage tanks.
  - b. Responsibility for operation

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HOWCO Environmental Services December 4, 1997 Page 14 Revised Dec. 16, 97

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- Elements of the on job materials handled a. oils 2.

  - water b.
  - hazardous materials c.

#### Transportation 3.

- a.
- b.
- processing equipment tanker and tank equipment transportation equipment c.
- in-house cleaning equipment d.

# Sampling for Analysis

1.	Importance of sampling
2.	Representative of entire waste stream
3.	Protective safety clothing (gear)
4.	Sample containers
5.	Types of samples
6.	Sampling procedures

# Gauging Tanks

1.	Accuracy of reading
2.	Protective and safety gear
3.	Procedure for reading meter

Recording 4.

Course Title: Training Hours: Course Material:	OSHA Hazardous Communication Standard 1 Video - Introduction to the Hazardous Communication Standard (JJ Keller), Lecture
Description:	Overview of OSHA requirements regarding handling of hazardous material, including labeling, MSDS.
Course Title:	OSHA HAZWOPER Emergency Response
Training Hours:	1
Course Material:	Video - Introduction to In-Plant Emergency Response (JJ Keller), Lecture
Description:	Overview of in-plant emergency procedures.
Course Title:	OSHA HAZWOPER PPE
Training Hours:	1

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Course Material:	Video - Introduction to Personal Protection Equipment and Clothing JJ
	Keller), Lecture
Description:	Overview of OSHA requirements for Personal Protection.

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HOWCO Environmental Services December 4, 1997 Page 15 Revised Dec. 16, 97

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#### ITEM 4 SPECIAL TRAINING FOR DRIVERS

Drivers receive additional training as noted below. New drivers will be placed with experienced drivers for a training period of one week on the truck they will be driving.

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Course Title:	Federal Motor Safety Regulations & Emergency Response
Training Hours:	1
Course Material:	Video and Lecture
	Federal Motor Safety Regulations Book & North American Emergency
	Response Guidebook.
Description:	Background information on using the NERG guidebook and review of the
-	FMSŘ.

In addition, to the training drivers receive a copy of Federal Motor Safety Regulations book & the North American Emergency Response Guidebook.

# ITEM 5 RECORD KEEPING

Documentation of training is in written form. These forms are kept in personnel files in each department.

# ITEM 6 UPDATING TRAINING REQUIREMENTS

The training program is updated any time:

- Changes in federal, state or other regulatory agencies revise, change or publish addenda to applicable regulations.
- New operating equipment is added or emergency response plan of action is upgraded.
- Safety program is upgraded.



Department of Environmental Protection

Lawton Chiles Governor Southwest District 3804 Coconut Palm Drive Tampa, Florida 33619

Virginia B. Wetherell Secretary

July 28, 1998

Tim Hagan, President Howco Environmental Services 3701 Central Avenue St. Petersburg, Florida 33713

# RE: Howco Environmental Services, FLD 152 764 767 Operating Permit Application HO52-308139 Third Notice of Deficiency

Dear Mr. Hagan:

The Florida Department of Environmental Protection (FDEP) has completed its review of the referenced application received on July 1, 1998, and determined that the information submitted is not complete. The information needed to complete the application is itemized in the attached Notice of Deficiency.

When a permit application is incomplete, all processing of the application is suspended. You are hereby advised to provide us with the necessary additional information, pursuant to the Florida Administrative Code (FAC) Rule 62-710.800 and Chapter 403.769 Florida Statutes (FS).

The deficiencies noted in the attached Notice of Deficiency constitute a violation of FDEP rules. Failure to correct these deficiencies within 45 days could subject you to formal enforcement action. If you cannot submit this information in 45 days, you must provide a schedule with dates indicating when this information will be submitted. If a complete response to each item is not submitted within the time frame given above, the FDEP will issue a Notice of Violation, begin the formal process to deny the permit pursuant to Section 120.60, FS, or take other appropriate actions.

The response made by Howco Environmental Services (Howco) to each item shall be as noted in Section 62-710.800(6), FAC which details the Certification of plans, specifications and other related documents supporting the permit application by a professional engineer registered in the State of Florida.

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Howco Environmental Services 3<sup>rd</sup> Notice of Deficiency Page 2

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In addition, each response must note that a revision has been made (a revised date in the revision block, the revision number should remain "0" until the application is deemed complete) and the response must be labeled and numbered such that it can be placed in the appropriate section of the application. This might necessitate the submittal of a new table of contents reflecting the revisions and correct page numbers.

Two copies of your response shall be submitted to the FDEP office in Tampa, Florida. You are encouraged to contact this office to discuss the deficiencies noted by the application review. This exchange of ideas will assist you in developing a complete and adequate response.

Should you like to arrange a meeting or if you have any questions, please contact me at (813) 744-6100, extension 388.

Sincerely,

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Roger Evans Permitting Engineer Hazardous Waste Section Division of Waste Management

Attachment

cc: Raoul Clarke, Administrator, FDEP -- Tallahassee Satish Kastury, Administrator, FDEP -- Tallahassee

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Howco Environmental Services 3<sup>rd</sup> Notice of Deficiency Page 3

#### Notice of Deficiency

#### Part 1-B-3

The Flood Insurance Rate Maps (125148-0027-B and 125148-0028-B) provided by Howco does not have sufficient information to demonstrate that the facility is not within the 100-year flood plain area. Please provide the panel of the map that identifies the area in which the facility is located. The facility's location should also be noted on the diagram.

Throughout the application Howco specifies that the used oil they process is recycled. Based on common usage the word "recycling" means reuse of the used oil. Since Howco is not reusing the used oil another term should be used throughout the application.

#### Attachment 3

Item 3.8. The application must describe the sampling conducted on the facility generated solids prior to mixing with a solidification agent.

Item 3.11. Describe what permit(s) or exemption(s)/exclusion(s) is Howco operating under for the two air strippers.

Item 3.12.1. Halogen screening is insufficient as a prescreen for antifreeze destined for disposal. Antifreeze destined for disposal must be sampled and analyzed by the generator for contaminants of concern prior to customer pick-up by Howco.

#### Attachment 4

Item 4.1.1. Describe in detail how a "composite sample" is obtained from multicompartmented vehicles.

Item 4.1.2. The third bullet identifies an EPA Method 8021A which has been replaced by 8021B. Please make the appropriate change to the text.

Even if concentrations of halogenated solvents in used oil are below 100 ppm each, does not automatically provide the rebuttal in every instance. For example, a particular batch of used oil is known to be contaminated with "F-listed" solvent waste through generator knowledge. In that case, the mixture should be treated as hazardous waste and the rebuttal cannot be demonstrated. Revise the text to add that in addition to the 50 FR 49176 guidance, a case by case determination should be made. 3 -

Item 4.2. Where and what is the Statistical data analysis mentioned in this paragraph?

Item 4.2.1. Please explain what is a discrete sample and a discrete composite as identified in the text. Is it equivalent to a grab sample? Please describe in more details the purpose of sampling, methods to be utilized and frequency of sampling.

Item 4.2.2. What is Method ASTM D93-85?

Item 4.4.1. The terms industrial solids and industrial cleaning are not specific enough as it may not include petroleum related waste.

Item 4.4.2. Is Howco proposing to perform a hazardous waste determination on a solid waste stream based solely on analyzing for TCLP metals and TCLP volatile organics?

### Attachment 5

The information submitted in Attachment 5 appears to indicate that Howco will be managing "oil solids products from customers." The management of the solid waste materials described do not seem to be intrinsically linked to, or a by-product of, a traditional used oil processing operation. Please refer to the Department's memorandum (enclosed) dated March 5, 1998 on this subject. Since these materials are solid wastes and are destined for disposal, and not recycling, they must be managed pursuant to a separate permit required by Chapter 62-701, FAC. Please indicate whether or not Howco intends to manage these solid waste materials. Although the used oil processing facility application may describe the management of these solid waste materials, the used oil permit which may be issued pursuant to Chapter 62-710, FAC., cannot authorize the management of these materials. If Howco elects to manage these solid waste materials, the Department's Solid Waste Section must be contacted concerning the solid waste permitting requirements for this activity.

Item 5.5.4. The language included in your response needs to be incorporated into the application.

Item 5.4. Please explain what is meant by "Both parts of this facility are utilizing a concrete pad surrounded on three sides with block walls......"

#### Attachment 6

The tracking plan as outlined does not comply with the requirements of 40 CFR 279.56. Please review the rules governing this section and amend the tracking plan accordingly.

Howco Environmental Services 3<sup>rd</sup> Notice of Deficiency Page 5

Item 6.3. This section does not comply with the requirement of 40 CFR 279.57(a)(2). Please revise this section to include; (i) Records and results of used oil analyses performed; and (ii) Summary reports and details of all incidents that require implementation of the contingency plan an specified in 40 CFR 279.52(b).

# Attachment 7

6.2

Item 7.3. Your response did not address our comments. The application must describe the inspection, testing and maintenance of the emergency equipment.

Item 7.5. Form 7-6 could not be located. Please provide this form. Form 8-3 could not be located. Please provide this form.

Item 7.3. This application should be specific in identifying the equipment that will be available for spill control. Please modify the language accordingly.

Table 7-3 The complete home address of the incident coordinators was not presented.

Table 7-4 The Florida Department of Environmental Regulations is now known as Florida Department of Environmental Protection.

#### Attachment 8

The contingency plan should be designed to be a stand alone document and all references should be included within the section.

Item 8.3. Please expand on what is meant by "All chemical usage areas where spills are likely to occur are found in the process and storage Equipment Location Plan."

Item 8.4. The last paragraph indicates that captured storm water from the property may be discharged into the storm sewer system. Please describe the precaution taken to insure that no contaminants flows off-site.

Item 8.8. Copies of the evacuation routes should not only be kept in a book in the plant office but posted at strategic locations throughout the facility. Please include verbiage that describes where other copies will be located.

Howco Environmental Services 3<sup>rd</sup> Notice of Deficiency Page 6

#### Attachment 9

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Item 9.1. The description of the storage tanks within the tank farm does not match Tables 9-1 and 9-2.

Tables 9-1 and 9-2 Please provide drawings that identify the containment areas 1, 2 and 3 as identified within these tables. Please provide the calculations that were used to determine the containment volumes of areas 1, 2 and 3. All engineering drawings, specifications and calculations shall be signed and sealed by an independent Professional Engineer registered in the State of Florida.

Item 9.4. Your response indicates that the piping system is all above ground and within secondary containment area, but the application does not mention any of this. Please clarify this inconsistency.

Table 9.3 Please identify how will the inspector determine that the areas inspected (e.g., 'Trailer with product locked' to 'Drum inspection') are of satisfactory or unsatisfactory condition. The log should also include an area that records any corrective action taken or needed to be taken.

#### Attachment 10

Item 10.2.1 Please include the justification for the number of samples and the sample locations selected. A statistically significant number of random soil samples should also be selected as previously discussed with Mr. Bill Crawford.

The soil sampling need to address samples through the asphalt or concrete around the tank farms and processing areas.

Item 10.4. The application needs to include an outline of the closure schedule activities to be performed by the facility. A response of "six months" to remove oil product and residues is not adequate.

#### Attachment 11

The discussion of the training requirements at Howco does not identify some of the main regulatory rules (i.e., Used Oil Regulations 40 CFR 279 and State Regulations 62-710 FAC) that the training program is intended to satisfy. The plan should also describe the records used to document employees training and how these records will be managed, who (job title) will retain the records, how long the records will be retained, frequency of training hours that will be provided, and formal aspects of the hands on training that provide the necessary training to the employees. This information must be included in the application.



Department of
 Environmental Protection



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

MEMORANDUM

per

Virginia B Wetherell Secretary

TO: Used Oil Processors

FROM: Rick Neves, Environmental Specialist

DATE: March 5, 1998

SUBJECT: Solid Waste Permit Considerations for Used Oil Processors

While the management of waste materials generated during the processing of used oil is addressed in the Used Oil Processor Permit, it has come to the attention of the Department that some Used Oil Processors may also be subject to Solid Waste permit requirements as well. The purpose of this memo is to clarify this issue

Various and sundry items besides processing sludges may be "oily wastes" under 62-701.200(76), or "materials containing or otherwise contaminated with used oil" under 40 CFR 279.10(c). It is not uncommon for handlers to manage these materials at their used oil processing facilities. However, there are some businesses which actively solicit and manage significantly large quantities of these "oily wastes" at their facilities. The question then is "Is this used oil processing or solid waste management?" It is clear in reading 57 FR 41581 (Sept. 10, 1992) that EPA expected some materials to contain a quantity of free flowing used oil which may be recovered and recycled (e.g. filters, wipers and absorbent materials). It is also clear that these items may be managed as used oil provided the used oil is to be recovered and recycled. Once the used oil is separated from the material, the material may be managed as used oil if burned for energy recovery, or as solid waste if it is determined to be non-hazardous and destined for disposal.

It is difficult to arbitrarily differentiate between oily and solid waste management for permitting issues. Some facilities focus on managing liquids where this may not be much of a problem while others include management of solids that may not fall within the definition of "oily wastes".

If the "oily waste" management seems intrinsically linked to, or a byproduct of, a traditional used oil processing operation, then it would seem that this activity might be addressed in a specific condition of the Used Oil Processor Permit. If, on the other hand, what is being managed seems to be an assortment of various solid wastes not traditionally considered liquid used oil (though it may contain a limited amount of recoverable used oil), or is a non-petroleum contaminated solid waste, a solid waste permit would be required. This is ultimately a determination that must be other District level between the District and the facility while maintaining consistency with necessarily be used oil.

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

Printed on recycled paper.

June 29, 1998

Roger Evans Florida Dept. of Environmental Protection Southwest District 3804 Coconut Palm Drive Tampa, FL 33619

Re: Oil Permit Application

Dear Mr. Evans:

Enclosed you will find our response to your request for additional information listed in your letter of October 24, 1997, "Second Notice of Deficiencies" including references as to their location within the modified document of April 29, 1998.

nmental Services

TRECEIVEN JUL DI 1998

Please use our document of June 12, 1998 as a comparison between the original and the modified versions of our permit applications, with additional language highlighted and deleted language stricken.

I am enclosing with this letter a revised copy of a completed application and certifications. Please use this revised application as a forward to our permit document, replacing the original forward in the September 25, 1997 issue. Please use the drawings and reference materials in the side pockets of the September 25, 1997 document for the modified document of April 29, 1998.

Sincerely,

Lynn Le Masters

Lynn LeMasters HOWCO Environmental Services

Enc. (2)

3701 Central Avenue – St. Petersburg, FL 33713 – Tel. 813-327-8467 Fax: 813-321-6213 Operations: Tampa Bay - Ocala - Ft. Myers – 24-Hour Emergency Access 1-800-435-8467

File 3-6 14198

# APPLICATION FORM FOR A USED OIL PROCESSING FACILITY PERMIT

Part I

го	BE	COMPL	ETED	BY	ALL	APPLICANTS	(Please t)	pe or	print)
----	----	-------	------	----	-----	------------	------------	-------	--------

JUL DA 19

State Zip Code

State Zip Code

City

City

A. General	Information
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1. New X Renewal Modification Date old permit expires

2. Revision number \_\_\_\_

3. NOTE: Processors must also meet all applicable subparts, (describe compliance in process description for applicable standards) if they are:

- X generators (Subpart C)
  - X transporters (Subpart E)
  - X burners of off-spec used oil (Subpart G)

X marketers (Subpart H)

- or
- X are disposing of used oil (Subpart I)
- 4. Date current operation began: \_\_\_\_\_1972
- 5. Facility name: HOWCO ENVIRONMENTAL SERVICES
- 6. EPA identification number: FDL 152-764-767
- 7. Facility location or street address: <u>B43 43RD STREET SOUTH<sub>1</sub> ST. PETERSBURG<sub>1</sub> FLORIDA</u>
- 8. Facility mailing address:

   <u>3701 CENTRAL AVENUE</u>

   Street or P.O. Box

   Street or P.O. Box
- 9. Contact person: <u>TIM HAGAN</u> Telephone: <u>@L3 827-8467</u> Title: <u>PRESIDENT</u> Mailing Address:

SAME AS ABOVE

10. Operator's name: \_\_\_\_\_\_\_ SAME AS ABOVE \_\_\_\_\_\_ Telephone: (\_\_\_\_\_\_\_\_\_ Mailing Address:

Street or P.O. Box

 11 Facility owner's name:
 TIMCO REAL ESTATE
 Telephone:
 (813) 327-8467

 Mailing Address:
 3701 CENTRAL AVENUE
 ST. PETERSBURG, FLORIDA 33713

 Street or P.O. Box
 City
 State
 Zip Code

12 Legal structure:

X corporation (indicate state of incorporation) FLORIDA

individual (list name and address of each owner in spaces provided below)

partnership (list name and address of each owner in spaces provided below)

other, e.g. government (please specify)

If an individual, partnership, or business is operating under an assumed name, enter the county and state where the name is registered: County\_\_\_\_\_\_ State \_\_\_\_\_\_

Mailing Address:			+	•
Street or P.O. Box	City	State	Zip Code	
		<u>_ ,</u> .	<u></u>	
Mailing Address:				
Street or P.O. Box	City	State	Zip Code	
Name: Mailing Address:				
Street or P.O. Box	City	State	Zip Code	
Name: Mailing Address:				
Street or P.O. Box	City	State	Zip Code	
Site ownership status: []owned []to be purchased [ []presently leased; the expirati If leased, indicate:	]to be leased on date of the le	years ase is:		
Site ownership status: []owned []to be purchased [ []presently leased; the expirati If leased, indicate: Land owner's name: <u>TIMCO_REAL_ESTATE</u> Mailing Address:	]to be leased on date of the le	years ase is:		
Site ownership status: []owned []to be purchased [ []presently leased; the expirati If leased, indicate: Land owner's name: <u>TIMCO_REAL_ESTATE</u> Mailing Address: <u></u>	]to be leased on date of the le 	years ase is: SBURG	FL ORIDA	_ 
Site ownership status: []owned []to be purchased [ []presently leased; the expirati If leased, indicate: Land owner's name: <u>TIMCO_REAL_ESTATE</u> Mailing Address: <u>3701_CENTRAL_AVENUE</u> Street or P.O. Box	]to be leased on date of the le 	years ase is: SBURG1 State	FL ORTDA Zip Code	- 
Site ownership status: []owned []to be purchased [ []presently leased; the expirati If leased, indicate: Land owner's name: <u>TIMCO_REAL_ESTATE</u> Mailing Address: <u>3701_CENTRAL_AVENUE</u> Street or P.O. Box Name of professional engineer <u>V.W. DJORDJEVIC</u> Mailing Address:	]to be leased on date of the le 	years ase is: State No. <u>PE_</u>	FLORIDA Zip Code	 
Site ownership status: []owned []to be purchased [ []presently leased; the expirati If leased, indicate: Land owner's name: <u>TIMCO_REAL_ESTATE</u> Mailing Address: <u>3701_CENTRAL_AVENUE</u> Street or P.O. Box Name of professional engineer <u>V.W. DJORDJEVIC</u> Mailing Address: <u>5733_LST_AVENUE_SOUTH</u>	]to be leased on date of the le 	years ase is: State No. <u>PE_</u> I RSBURG	FLORIDA Zip Code	
Site ownership status: []owned []to be purchased [ []presently leased; the expirati If leased, indicate: Land owner's name: <u>TIMCO_REAL_ESTATE</u> Mailing Address: <u>3701_CENTRAL_AVENUE</u> Street or P.O. Box Name of professional engineer <u>V.W. DJORDJEVIC</u> Mailing Address: <u>6733_LST_AVENUE_SOUTH</u> Street or P.O. Box Associated with: V.W. DJORDJEVIC <sub>1</sub> P.E.	Jto be leased on date of the leased STPETER: City Registration Registration STPETE City	years ase is: State No. <u>PE_1</u> RSBURG State	FLORIDA Zip Code DO41412 FLORIDA Zip Code	-  

- 3. Attach a topographic map of the facility area and a scale drawing and photographs of the facility showing the location of all past, present and future material and waste receiving, storage and processing areas, including size and location of tanks, containers, pipelines and equipment. Also show incoming and outgoing material and waste traffic pattern including estimated volume and controls.

1.1

#### C. OPERATING INFORMATION

- 1. Hazardous waste generator status (SQG, LQG) N/A
- 2. List applicable EPA hazardous waste codes:

N/A \_

3. Attach a brief description of the facility operation, nature of the business, and activities that it intends to conduct, and the anticipated number of employees. No proprietary information need be included in this narrative.

A brief description of the facility operation is labeled as Attachment \_\_\_\_\_

4. Attach a detailed description of the process flow should be included. This description should discuss the overall scope of the operation including analysis, treatment, storage and other processing, beginning with the arrival of an incoming shipment to the departure of an outgoing shipment. Include items such as size and location of tanks, containers, etc. A detailed site map, drawn to scale, should be attached to this description. (See item 4, page 4).

The facility's detailed process description is labeled as Attachment \_\_\_\_\_\_

- 5. The following parts of the facility's operating plan should be included as attachments to the permit application. (See item 5 on pages 4 and 5):
  - a. An analysis plan which must include:
    - (i) a sampling plan, including methods and frequency of sampling and analyses;
    - (ii) a description of the fingerprint analysis on incoming shipments, as appropriate; and
    - (iii) an analysis plan for each outgoing shipment (one batch/lot can equal a shipment, provided the lots are discreet units) to include: metals and halogen content.

The analysis plan is labeled as Attachment <u>4.0</u>

b. A description of the management of sludges, residues and byproducts. This must include the characterization analysis as well as the frequency of sludge removal.

Sludge, residue and byproduct management description is labeled as Attachment \_5.0\_\_\_\_

c. A tracking plan which must include the name, address and EPA identification number of the transporter, origin, destination, quantities and dates of all incoming and outgoing shipments of used oil.

The tracking plan is included as Attachment \_\_\_\_\_

6. Attach a copy of the facility's preparedness and prevention plan. This requirement may be satisfied by modifying or expounding upon an existing SPCC plan. Describe how the facility is maintained and operated to minimize the possibility of a fire, explosion or any unplanned releases of used oil to air, soil, surface water or groundwater which could threaten human health or the environment. (See item 6, page 5).

The preparedness and prevention plan is labeled as Attachment \_\_\_\_\_\_

 Attach a copy of the facility's Contingency Plan. This requirement should describe emergency management personnel and procedures and may be met using a modifying or expounding on an existing SPCC plan or should contain the items listed in the Specific Instructions. (see item 7 on pages 5 and 6).

The contingency plan is labeled as Attachment <u>8.0</u>

8. Attach a description of the facility's unit management for tanks and containers holding used oil. This attachment must describe secondary containment specifications, inspection and monitoring schedules and corrective actions. This attachment must also provide evidence that all used oil process and storage tanks meet the requirements described in item 8b on page 6 of the specific instructions, and should be certified by a professional engineer, as applicable.

The unit management description is labeled as Attachment \_\_\_\_\_\_

 Attach a copy of the facility's Closure plan and schedule. This plan may be generic in nature and will be modified to address site specific closure standards at the time of closure. (See item 9, pages 6 and 7).

The closure plan is labeled as Attachment \_\_\_\_\_\_

10. Attach a copy of facility's employee training for used oil management. This attachment should describe the methods or materials, frequency, and documentation of the training of employees in familiarity with state and federal rules and regulations as well as personal safety and emergency response equipment and procedures. (See item 10, page 7).

A description of employee training is labeled as Attachment \_\_\_\_\_\_

DEPm#62-710.901(a)Form TitleUsed Oil Processing FacilityPermit ApplicationEffective DateDecember 23, 1996

j.

# **APPLICATION FORM FOR A USED OIL PROCESSING PERMIT**

#### PART II - CERTIFICATION

### TO BE COMPLETED BY ALL APPLICANTS

#### Form 62-710.901(a). Operator Certification

Facility Name: HOWCO\_ENVIRONMENTAL\_SERVICES\_EPA ID#\_FID\_152-764-767

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

Signature of the Operator or Authorized Representative\*

TIM HAGAN, PRESIDENT

Name and Title (Please type or print)

Date: 09/25/17 Telephone: (A], 3) 327-A4L7

\* If authorized representative, attach letter of authorization.

DEP Form#62-710.901(b)Form TitleUsed Oil Processing FacilityPermit ApplicationEffective DateDecember 23, 1996

# **APPLICATION FROM FOR A USED OIL PROCESSING PERMIT**

# PART II - CERTIFICATION

#### Form 62-710.901(b). Facility Owner Certification

Facility Name: HOWCO ENVIRONMENTAL SERVICES EPA ID#\_FLD 152-764-767

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

no A Owner or Authorized Representative\* of the Facility Signature

TIM HAGAN, PRESIDENT Name and Title (Please type or print)

7

Date: 09/25/97 Telephone: (A13) 327-8467

\* If authorized representative, attach letter of authorization.

 DEP Form#
 62-710.901(c)

 Form Title
 Used Oil Processing Facility

 Permit Application

 Effective Date
 December 23, 1996

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# **APPLICATION FROM FOR A USED OIL PROCESSING PERMIT**

# PART II - CERTIFICATION

#### Form 62-710.901(c) Land Owner Certification

Facility Name: HOWCO ENVIRONMENTAL SERVICES EPA ID# FLD 152-764-767

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

Signature of the Land Owner or Apthorized Representative\*

TIM HAGAN, PRESIDENT Name and Title (Please type or print)

Date: 09/25/月? Telephone: (813) 327-8467

\* If authorized representative, attach letter of authorization.

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### APPLICATION FORM FOR A USED OIL PROCESSING PERMIT **PART II - CERTIFICATION**

Form 62-710,901(d) P.E. Certification [Complete when required by Chapter 471, F.S. and Rules 62-4.050, 62-761, 62-762, and 62-710, F.A.C.]

Use this form to certify to the Department of Environmental Protection for:

- Certification of secondary containment adequacy (capacity), structural integrity (structural strength), 1. and underground process piping for storage tanks, process tanks, and container storage. Certification of leak detection. Substantial construction modifications.
- 2.
- 3.
- Those elements of a closure plan requiring the expertise of an engineer. Tank design for new or additional tanks. 4.
- 5.
- Recertification of above items. 6.

Please Print or Type

Initial Certification

2. Tank Number: All tanks at this plant

Recertification

1. DEP Facility ID Number: FLD152-764-767 3. Facility Name: HOWCO Environmental Services

4. Facility Address: 843 - 43rd Street South, St. Petersburg, Florida

This is to certify that the engineering features of this used oil processing facility have been examined by me Inis is to certify that the engineering features of this used oil processing facility have been examined by me and found to conform to engineering principles applicable to such facilities with the following exceptions: 1. Secondary containment structure No. 2 containing tanks 121 to 129 inclusive does not conform to engineering design requirements; 2. Secondary containment structures 1, 3, and 4 require repair and water proofing; and 3. Some oil storage tanks are riveted type and some exhibit minor structural deformations. In my professional judgment, this facility, when proper secondary containment structure replaces existing containment structure No. 2, and required repairs and water proofing of other secondary containment structures are in place, and when maintained and operated properly, or closed, will comply with applicable statutes of the State of Florida and rules of the Department of Environmental Protection.

V.W. Spadjen Z Signature

Name (please type)

Florida Registration Number PF 41412

Mailing Address: 6733 - 1st Avenue South Street or P.O. Box

> St Petersburg FL 33707 State Zip City

Date: \_\_\_\_09/25/97 \_\_\_ Telephone: \_\_\_(813) 345-0080

(PLEASE AFFIX SEAL)

V. W. Shadere ~ 1997

# A. General Information

# 1. New X Renewal Modification Date old permit expires

#### **RESPONSE:** Part I-A 1

Two locations were checked as applicable. The renewal location should be left empty.

### Part I B.3

The map indicating the location of the 100-year flood plan could not be located. A topographic map depicting the location of the 100-year flood plan, and the source of the information must be included in the application.

### **RESPONSE**:

Part I B.3

The topographic map depicting the 100 year flood plan is published by the Federal Emergency Agency, Telephone No. 1-800-358-9616. A copy of the section where our plant is located is enclosed. See Attachment - 100 Year Flood Plan.

# Part I-C.4 (Attachment 3)

The application does not discuss the generation, capture of reuse of the off-gasses generated during the distillation process. This information should be included in this application, and the application should describe how this information is presented to the FDEP air section. The detail description of the process has been rewritten and the relationship to previously submitted information (which describes processing based on weight percentage water) is not clear. The application must describe the management of each separate stream.

# **RESPONSE**:

#### Part I-C.4 (Attachment 3)

The off gasses released as a result of the separation of water from oil are captured and piped to an air to steam condenser where the gasses are re-condensed. The condensed vapor gravity flows through piping into a storage tank. The condensate further cools and separation of water from light ends is accomplished through stratification of liguids in the condensate holding tank. The operator distinguishes light ends from water by color as he pumps the condensate from either the bottom or top from of the condensate holding tank. Vented gases from the condensate storage tank are filtered through a filter container of activated carbon media and vented to the atmosphere. Color cut paste can be used for a higher degree of accuracy if needed. The water is pulled out to Howco's untreated water storage tanks awaiting pre-treatment. The light ends are pulled off and blended into processed oil tanks during the batching process.

Item 3.9 and 5.2. The application has been revised to include a general description of the management of the solids generated by SWECO oil/solid separator. The description does not provide sufficient details on the processing, solidification and disposal of these solids.

HOWCO Environmental Services December 4, 1997 Page 2 Revised Dec. 16, 97

#### **RESPONSE**:

Item 3.9 and 5.2

Management of the solids generated by Sweco oil/solids separator consists of the following activities: Solids removed by the Sweco vibrating mesh screen are discharged into 55 gallon drums. When the drum is nearly full the contents are vacuumed out and taken to the sludge processing area for processing. The spent solids are pumped into the cone decanting tank for separation. The remaining liquids are pulled off through decanting lines and returned to the oil plant for reprocessing. The remaining solids are then mixed with a solidification agent and allowed to dry. Upon completion of the drying the solids are loaded into trucks and transported to a land fill facility or thermal remediation for disposal.

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Item 3.7.2. The application states that oil recovered from the emulsion breaking treatment is pumped directly into the product storage tank. The fate of the emulsion breaking chemicals should be discussed.

# **RESPONSE**:

Item 3.7.2

The bulk of the spent demulsifier is dissolved in the water and pumped to the water plant awaiting pre-treatment.

# Item 3.7.3. The discussion of used oil decanting from the tanks in the waste water treatment facility has been removed. Has Howco discontinued this practice, and if so what are the new procedures?

#### **RESPONSE**:

Item 3.7.3

The untreated water tanks accumulate a nominal amount of oil on the surface of the water. The water plant operator pulls the water out of the untreated tanks from the bottom until oil is detected. The remaining oil is pumped to the oil plant for processing.

# Attachment 5. The application should describe the fate of the dewatering liquid removed from process sludges.

RESPONSE: Attachment 5

Item 5.5.1

Liquids can be recovered from the decanting cone tank by decanting liquids from pipes attached to the tank. These line are about every two feet along side of the tank. Liquids can be gravity drained

HOWCO Environmental Services December 4, 1997 Page 3 Revised Dec. 16, 97

APPERTUN off at different levels using these lines. The liquids are then trucked to the plant receiving area for sampling and testing prior to off-loading.

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#### **RESPONSE:**

#### Item 5.5.4

Liquids removed during the water plant sludge pressing process are piped back to the pre-treatment plant for reprocessing.

Item 2.3 This item references a sludge processing facility. This facility was not identified on the site plan. Is this facility the sludge drying bed? The description does not match previous descriptions provided during meeting and site visits. Additionally, the process associated with the sludge drying bed should be described. The management of all waste streams should be identified.

#### **RESPONSE:**

#### Item 2.3

The sludge processing facility consists of the sludge drying bed, the sludge press and decanting cone tank all located on the site map. A donut shaped earthen dike is used to contain sludge. The earth and sludge are mixed together to form a drier and more stable mixture. Samples are drawn for any required analysis. Upon approval the mixture is loaded into trucks and shipped for disposal. Both parts of this facility are utilizing a concrete pad surrounded on three sides with block walls and on the North side by a drainage trench. The trench is used to intercept liquids from sludge press as well as from the drying bed. Refer to Page 3 Item 5.2 for processing waste and Attachment 5 Item 5.2, for more details.

#### Item 2.4. The application should describe how the oil from the compacted filters is recovered.

#### **RESPONSE:**

#### Item 2.4

The oil filter crushing unit is fitted with a sealed drip pan to catch and hold oils extracted during the crushing process. This oil is pumped from the drip pan using a permanently mounted pump into storage tank adjacent to the crusher. The oil in the tank is then removed using a truck and transported to the oil plant receiving area for sampling and testing prior to being off-loaded into the receiving tanks.

#### Attachment 4 (Waste Analysis Plan)

The plan presented indicates that product knowledge will be used to make the on or off specification determination. Additionally, statistical analysis is described as the basis for using product knowledge. Please revise the plan to include periodic discrete tank sampling to validate the statistical basis.



#### **RESPONSE:**

Attachment 4

Periodic discrete sampling and analysis is performed on a processed oil tank once per week. The results of the processed oil analysis are fed into our database for statistical comparison to further substantiate the use of product knowledge.

1. The application must include an example of the Waste Material Profile Sheet (Mentioned in item 3.1.1) The description of pre-qualification procedures (Item 3.1.1) indicates that a Waste Material Profile Sheet will be obtained for each waste stream. Item 3.1.2 indicates that the submittal of the Waste Material Profile Sheet is one of three methods of pre-qualifying a shipment. The application should be revised to eliminate this inconsistency. The application should also discuss the retention of this information.

2. The description of driver responsibilities (page 3-1 Item 3.2) at the customer does not include the actions the driver will take should any test indicate the presence of unacceptable halogen contamination.

# THIS RESPONSE IS TO BE MOVED TO ATTACHMENT 5 ITEM 5.1

1. RESPONSE: See enclosed copy of Generator's Waste Profile Sheet.

The process begins with Pre-qualification prior to arrival at the facility of the above materials in accordance with all EPA, FDEP, and local laws and regulations. HOWCO has adopted the following waste profile procedures: 3.1.1 Generators are required to pre-qualify their shipments. This can be effected in one of three ways:

- -- By submitting a satisfactory non-hazardous certification from a certified lab.
- .- By forwarding a sample of the material to HOWCO for performance of Hazardous Characteristics Testing and decision to accept or reject it.
- By submittal of a signed Waste Material Profile Sheet detailing the waste characteristics.
   See enclosed copy of Generator's Waste Profile Sheet.

Copies of these documents are kept on file in the sales department for a minimum of three years.

Waste Material Profile Sheet (MSDS) is only required if the waste is going to be sent off site for disposal (ie., non-petroleum solids). Should the waste be recycled on site (ie., used oil, petroleum waste, oil filters, etc.) MSDS will not be required.

#### **RESPONSE**:

Item 3.1.2 Once the determination has been made regarding acceptance of the material, HOWCO will assign a Manifest number identifying the waste stream and the generator. \*\*See enclosed copy of the HOWCO manifest.

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2. Oil recovery is issued a Halogen leak detector (Sniffer) and a reference fluid sample of 900 PPM. The lab chemist will service and properly set the sniffers weekly. It is the drivers' responsibility to present the sniffer to the chemist. New reference samples are issued monthly.

All liquid products (water, oil, free product, antifreeze) are tested before pick up to ensure that the driver knows what is being pumped into the recovery truck or picked up by the drum truck. All products must be tested for Halogens before loading into any company truck. Testing method(s) and results shall be documented in the comment section of the manifest. If the sniffer indicates a presence of halogenated compounds above 900 ppm, the driver must then inform the customer, describe the Dexsil test and cost, and request permission to perform a Chlor-D-Tect Q4000 (Dexsil) test (EPA method 9077). If the customer declines further testing using field kit the driver notes on the manifest the customer's refusal and does not accept the customers oil. If the customer/generator is willing to pay, the driver shall then perform the Dexsil. Once this field test has been run and the results indicate less than 1000 ppm, he or she shall then collect the oil and document, on the manifest, the results of the Dexsil. If this test indicates greater than 1000 ppm, the oil shall be rejected. The driver must indicate the reading of the Dexsil on the manifest, along with the cost of the service. The notation on the manifest will enable our sales department to be notified. Explain to the customer/generator that you are not allowed by Federal Law to pick up the product and that the product must be disposed of by using a company certified to transport hazardous waste. Advise the customer that our Customer Service Department can arrange with a certified company. Should the customer refuse to allow any further testing, make the proper notation on the manifest along with the date, time and name of the individual

Item 3.1.3 indicates that a manifest number is assigned to a generator and waste stream once a determination of acceptance is made. The application does not specify the actions to be taken for acceptance or rejection, and should be revised to indicate the actions taken by Howco. The application should describe what document is used to record movement of the used oil from the generator to the processing facility. The application should include an example of the transportation document, and how this document is managed.

#### **RESPONSE**:

Acceptance or rejection of any waste, other than used oil and petroleum contact water, is based on the criteria as indicated in ATTACHMENT 4, sub E, table 3. (SEE ATTACHMENT - TABLE 3) Results of analysis. showing any constituent equal to or over the allowable level, indicates that the waste can not be accepted.

#### Attachment 5 (Solids and Sludge Management)

# This plan must include a more detailed descriptions of the processes and equipment used and details of the disposal of all waste streams. (§279.59).

#### **RESPONSE**:

#### Item 5.2

Used oils received at the HOWCO processing facility contains suspended solids that are removed during the recycling process. Various petroleum sludge and dirt are filtered out of the used oil by the use of a vibrating fine mesh screen. The vibrating screen is designed to discharge the solids residue into a drum adjacent to the vibrating unit. The minimal liquids are captured by use of a stand

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HOWCO Environmental Services December 4, 1997 Page 6 Revised Dec. 16, 97

pipe and returned to the process. Solids that are removed by the vibrating screen are held in the drum until such time as the drum requires emptying through a HOWCO owned vacuum truck and deposited into a decanting tank for final separation, treatment and eventual disposal.

HOWCO receives a variety of petroleum contaminated products from its customers. HOWCO accepts sludges in truck loads, drums and vacuum trucks. Petroleum sludges, petroleum impacted soils and used absorbent materials are processed for disposal similarly. If applicable to the product, further decanting is done to recover any free oils available for recycling. The solids which do not require further decanting or if decanting is not possible due to the consistency of the product, the sludges are mixed with solidification agents for drying and further processing through thermal remediation or shipped to landfill. The remaining solids and sludges are mixed with a solidification agent and allowed to dry. Upon completion of the drying the solids are loaded into trucks and transported to a landfill facility or thermal radiation facility. The equipment used in this process: Front End Loader, Vacuum Truck, hoses and hand tools.

#### Attachment 6 (Tracking)

Item 6.2 The application states that an original and two copies of the manifest document will be made. The distribution of the copies indicates that 4 copies are made. The application should be revised to be consistent. Additionally, the application states that copy 2 will be given to the generator. The application should justify the retention of the original by Howco.

RESPONSE: Attachment 6 Item 6.2

- A Howco representative signs and dates the manifest and/or bill of lading to certify that the material describe on the manifest and/or bill of lading has been received This is the point where Howco takes control of the material described on the manifest.
- Original and copy #2 are forwarded to Accounting.
- Copy #1 is left with the generator.
- Copy #3 is given to the Transportation Department.
- Copy #4 is kept by the driver and turned in at the end of the work day to the Transportation Department.

There is not a requirement that dictates the distribution manifest document or copy of the manifest. HOWCO made a business decision to retain the original manifest document

#### Attachment 7 (Preparedness and Prevention)

#### 1. The inspection, testing and maintenance of the emergency equipment are not discussed.

- 2. Access to communication devices at all times is not discussed.
- 3. Arrangements with local authorities are incomplete.

# 4. The application must describe the actions Howco has taken to familiarize local authorities with the facility and its preparedness, prevention and emergency response procedures.



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# 5. The description must include how the facility will manage the records of this familiarization.

#### **RESPONSE:** Attachment 7

1. The pumps dedicated to spill containment are tested annually and stored adjacent to the storage trailer in the plant yard area. See Attachment - Item 7.e Spill Response Equipment.

2. Communication devices available to employees involved in spill containment are two-way radios, telephones and direct communications. A loud speaker is also available to page workers from any telephone. The plant emergency alarm is available to issue the evacuation orders if needed.

3. Orientations are given at the request of the Fire Department for new firemen. This keeps the department employees familiar with our facility.

4. Copies of the HOWCO SPCC plan has been distributed to fire, police, and hospitals. This SPCC will be revised to reflect the process and procedure changes included in this application and redistributed.

5. Orientation forms will be kept in the permit book to document this familiarization.

Specific questions on items related to facility preparedness and prevention are identified below:

Item 7.1 The application must identify the schedule for the upgrading of the containment systems for the tank systems.

#### **RESPONSE**:

HOWCO is working with FDEP to schedule the required upgrading. HOWCO has proposed a schedule for the upgrading of the containment system to FDEP and we are awaiting the department reply.

Are drivers required to be present when loading and unloading trucks and/or containers? What type of communication is available to the drivers during unloading and loading operations? Are loading or unloading operations conducted with only the driver present at the facility?

RESPONSE: Item <del>7.1.1</del> **7.5** 



The drivers are present during the unloading process as well as the plant operator to supervise the unloading of products. Direct communication is available during the unloading process.

Item 8.5.9 As described, the only incident requiring a written report would be a release of oily material that leaves the property. The reporting requirements of 62-710 FAC, 62-762 FAC, and 40 CFR 279 should be reviewed to determine when a spill or release must be reported, and the application revised as necessary.

**RESPONSE:** 

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HOWCO Environmental Services December 4, 1997 Page 8 Revised Dec. 16, 97

Release of used oil requiring written notification.

Written Notification:

- 1. Spills of used oil of any amount in any body of water
- 2. Spills of used oil on any impervious surface of 25 gallons or more.
- 3. Spills of used oil in secondary containment on an impervious surface of 500 gallons or more.

Steps to take immediately after release of used oil or other hazardous materials:

- 1.Stop release as soon as possible.
- 2.Contain release with absorbent materials.
- 3.Clean up spill and any residue and store in DOT approved containers.
- 4.Dispose of used absorbent material and all released hazardous materials at an approved disposal/recycle facility.

Notify State and Local agencies as required by 49 CFR 171.16 to the National Response Center (800-424-8802 or 202-426-2675) and report in writing as required by 49 CFR 171.16 to the Director, Office of Hazardous Materials Regulations, Materials Transportation Bureau, Department of Transportation, Washington, DC, 20590. Notify the State Warning Point at (904=488=1320).

#### Attachment 8 (Contingency Plan)

The contingency plan as presented does not include all the information requested in the instructions for completion of the application. The information not identified ans specific questions of the information in the contingency plan are identified in the following comments. The item numbers are references to the instructions for completion of the application form.

Item 7.a The application only presents the specific actions to be taken by the Incident Commander in response to fire and explosions. Action to be taken by other employees must be included.

#### **RESPONSE**:

Item 7.a

In addition to the Incident Commander the Operating Personnel will under the direction of the Incident Commander, place and position the absorbent booms and pads in strategic points to contain spills as needed. Response team members will also operate pumps and man hoses to further contain or capture spills. Team members will perform other assigned tasks needed as directed by the Incident Commander.

#### Item 7.b The description of the emergency response arrangements is not presented.

#### **RESPONSE:**

ltem 7.b

Arrangements with outside agencies. HOWCO has notified the fire and police departments and local hospitals of the hazards present at the facility. Each one of these agencies have been given copies of our SPCC Plan for review to familiarize them with our plan for emergency response to fire or

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HOWCO Environmental Services December 4, 1997 Page 9 Revised Dec. 16, 97

spills. The fire department has visited several times to familiarize new firemen with our facility. Orientations can be given upon request.

#### Item 7.c The qualifications of the emergency response coordinator are not present.

#### **RESPONSE**:

Item 7.c

The Plant Manager is the primary Emergency Response Coordinator due to the nature of his position. The Plant Manager is most familiar with the plant equipment and contents of all the tanks and their potential for fire or explosion on a daily basis. He is a licensed stationary steam engineer and well versed in potential danger of explosion of pressure vessels and heat exchange apparatus. The secondary Emergency Response Coordinator is the President of the Company and familiar with the plant and its associated equipment due to many years of hands on work at the facility. The third Emergency Response Coordinator is the HOWCO Incident Commander, he is familiar with the plant and his primary duties daily are to supervise and work in the field of emergency response for HOWCO customers.

Item 7.e The plan includes a list of equipment available during an emergency, but does not describe the capabilities of the equipment nor is the location of the spill response equipment identified on a facility map.

RESPONSE: Item 7.e See attachment 7.e - Equipment available for spill control.

### Item 7.f The location of tanks and containers specifically dedicated for the storage of spill or released materials is not identified.

**RESPONSE:** 

Item 7.f

There are no specific tanks or containers dedicated to spill containment. Any or all tanks can be available to contain spills including all available tankers, Howco owned recovery trucks and vacuum trucks.

#### Item 7.h The application does not indicate that the evacuation routes are posted in the plant and should be revised to indicate where copies of the evacuation routes will be posted.

**RESPONSE:** 

Item 7.h

Copies of the evacuation routes are kept in the permit booklets in the plant office building and posted at the bulletin board in the operations pump office entrance-way. A copy of this plan will be kept at the plant manager's office at the facility. A second copy will be kept at the main office. Conditions that may require modification of the plan include: upgrades to equipment, other services provided to HOWCO customers, should part of the plan fail.

This plan does not specify where copies of the plan will be maintained at the facility, and does not describe the conditions that will require modifications of the plan.





HOWCO Environmental Services December 4, 1997 Page 10 Revised Dec. 16, 97

#### **RESPONSE:**

A copy of this plan will be kept at the plant managers office at the facility. A second copy will be kept at the main office. Conditions that may require modification of the plan include upgrades to equipment, facility, and other services provided to HOWCO customers.

Attachment 9 (Unit Management) Containers

The application (Item 3.3) mentions the receipt of drums. The application does not describe, nor clearly indicate on a facility map, the location of the container storage area. This description should include details of construction, engineering drawing with cross section, and the features that make the area impervious to water and used oil.  $(p - y^{-1})$ 

The facility map/has been revised to indicate the drum processing area which consists of two parts, one, a slab south of collector channel constructed of reinforced concrete and the other north of the collector channel paved with concrete and covered with asphalt used as a staging area for handling arriving drums prior to unloading filters into crushing machine.

There are no existing engineering drawings available for the construction of this facility. This area has secondary containment on drawings identified as collector channels with a storm water sump pump. All solids, and storm water are gravity drained to the collector channel and then returned into the water/oil processing facility by the sump pump. This area is one of the areas that HOWCO and FDEP are working together on a schedule for installation of an impervious coating.

### The application does not include the inspection checklist used to inspect the container storage area(s), and record any corrective action taken or needed to be taken.

#### **RESPONSE:**

See enclosed Monthly Visual Inspection Form. Completed inspection forms including maintenance items are stored in the files in the Plant Manager's office available for inspection.

Tanks (Item 9.1).

# Table 9-1 identifies the tanks at the facility, but does not provide the materials of construction or construction specifications. The application must describe he aspects of the tanks that demonstrate how the tanks comply with the requirements of 62-762.500(3) (d), (e) and (f) FAC.

#### **RESPONSE:**

All storage tanks are fabricated from carbon steel plates welded with butt or lap welds with a number of tanks with riveted connections. Construction specifications are not available since all tanks have been purchased as used equipment. All tanks are erected in secondary containment concrete foundations. None of the tanks required cathodic protection for tank bottoms. All tanks are exteriorly coated. Tanks are not equipped with any measuring devices which show the level of liquids in the tanks, however, manual tank gauging is performed on a daily basis or after any product movements.

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HOWCO Environmental Services December 4, 1997 Page 11 Revised Dec. 16, 97

The application must describe the piping system and how it complies with 62-762.500(4) FAC. The application must describe the secondary system and how it complies with 62-762.500(6) FAC. The application must describe the tank maintenance procedures and how repairs will be made in accordance with 62-762.700 FAC.

#### **RESPONSE**:

Piping system consists of steel pipes with welded joints all above ground and within secondary containment area. Since piping installations are not in contact with soil, no cathodic protection is required.

The inspection plan presented on page 9.3 is a conceptual view of the inspection program for the facility. The inspection plan should include the forms used by the inspectors. The inspection forms should include any observations made during the inspection and the actions necessary to correct deficiencies detected during the inspection.

RESPONSE: Item 9.3 (Include a copy of monthly tank inspection document)

### The application must describe the management of rain water that accumulates in the secondary containment areas at the facility.

RESPONSE: Attachment 9 Item 9.1.1 Rain water that is collected in the containment area is pumped by sump pumps into the storm water storage tank. Storm water captured can be used in one of two ways:

- 1. Controlled discharge to the sewer system.
- 2. Used and treated in the pre-treatment plant.

Storm water is discharged to the sewer system when the storm water tank attains approximately 70% full, the pressure of the water forces the storm water on the bottom of the tank through a pipe loop out into the yard. The rain water is routed to the center of the facility and then through a boomed swale and subsequent oil/water separator prior to release into the storm drain system.

#### Attachment 10 (Closure Plan)

The application did not describe the sampling to be conducted to document that decontamination of the unit management areas had been successful. The description should include specific sampling methods, sampling parameters, and analytical methods. The discussion of samples and sample location could be summarized in table form to ensure that the specific samples identified are all described.

The disposal of solids generated during the closure was not discussed in the closure plan.

The closure plan discusses the taking of soil samples form location of visual soil staining at the facility. The application must include a discussion of mandatory soil sampling and contingent

HOWCO Environmental Services December 4, 1997 Page 12 Revised Dec. 16, 97

#### groundwater sampling. The plan should also include any additional actions the facility will take should contamination soils or groundwater be identified during the sampling.

Sampling of the below listed areas will be performed in accordance with S-W-846, or equivalent methods. 8260

Soil samples will be analyzed for EPA Method 8240, 8270, TRPH (9073) and TCLP metals. Arsenic, Cadmium, Chromium, and Lead.

Groundwater will be sampled for EPA Method 624 (8260), 625 (8270), TRPH (418.1). 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 ATRP eligible petroleum contamination from existing used oil contamination.

Should soil samples found to be 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 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. If all contaminated soil cannot be practically removed at closure or if closure cannot be accomplished on the used oil processing and storage tank area, a Contingent Closure Plan will be implemented. This plan will respond to those areas and elements where clean closure could not be accomplished.

Soil Sampling

Six soil samples will be collected around the containment area of the used oil storage and processing tanks, including two samples on the east side, two samples on the west side, and two samples on the south side near the receiving area. Soil samples will be collected and analyzed for the above listed differentiate any ATRP eligible petroleum contamination for existing used oil contamination. parameters. Samples will be taken at six inches and another sample will be taken at eighteen inched D below ground surface at each sampling location. The soil will be analyzed, as set forth above to

Solids Generated at Closure

The disposal of solids generated during the closure are the same as residue discussed in the closure Attachment 10 Item 10.3. Decontamination. For the purpose of closure, residue, and solids are one and the same.

Training

Lorr Kerne Lorr Kerne

The training plan for the facility could not be located, and must be included as a portion of the application.

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#### **ATTACHMENT 11**

#### **EMPLOYEE TRAINING OUTLINE**

#### **ITEM 1 PURPOSE**

To instruct and inform employees in the areas of:

- daily plant operation
- the use of equipment
- product handling
- familiarity with state and federal rules and regulations
- personal safety and emergency procedures and response equipment
- the safe and efficient management of assets and equipment including hazardous materials and wastes.

The following preliminary training modules were designed to meet regulations as described in references listed below.

#### ITEM 2 REFERENCES

- 40 CFR Part 262
- 49 CFR Part 172 Subpart H
- 29 CFR 1910.120
- 29 CFR 1910.1200
- Florida Used Oil Transporter's Certification Manual
- Federal Motor Safety Regulations
- North American Emergency Response Guidebook

#### **ITEM 3** GENERAL INTRODUCTION

The following outline will be given to all new employees during their probation period. Employees assigned to a new position will receive job classification specific training, according to the position.

Introduction - Safety Procedures

- 1. Employee obligations
  - a. Safety procedures in plant including sampling and measuring content in storage tanks.
    - b. Responsibility for operation

HOWCO Environmental Services December 4, 1997 Page 14 Revised Dec. 16, 97

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Elements of the on job - materials handled a. oils 2.

- water b.
- c. hazardous materials

#### 3. Transportation

a.	processing equipment
b.	tanker and tank equipment
c.	transportation equipment
d.	<ul> <li>in-house cleaning equipment</li> </ul>

#### Sampling for Analysis

1.	Importance of sampling
2.	Representative of entire waste stream
3.	Protective safety clothing (gear)
4.	Sample containers
5.	Types of samples
6.	Sampling procedures

#### Gauging Tanks

1.	Accuracy of reading
2.	Protective and safety gear
3.	Procedure for reading meter
4.	Recording

Course Title: Training Hours: Course Material: Description:	OSHA Hazardous Communication Standard 1 Video - Introduction to the Hazardous Communication Standard (JJ Keller), Lecture Overview of OSHA requirements regarding handling of hazardous material, including labeling, MSDS.	
Course Title: Training Hours: Course Material: Description:	OSHA HAZWOPER Emergency Response 1 Video - Introduction to In-Plant Emergency Response (JJ Keller), Lecture Overview of in-plant emergency procedures.	
Course Title: Training Hours: Course Material: Description:	OSHA HAZWOPER PPE 1 Video - Introduction to Personal Protection Equipment and Clothing JJ Keller). Lecture Overview of OSHA requirements for Personal Protection.	

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#### ITEM 4 SPECIAL TRAINING FOR DRIVERS

Drivers receive additional training as noted below. New drivers will be placed with experienced drivers for a training period of one week on the truck they will be driving.

Course Title:	Federal Motor Safety Regulations & Emergency Response	
Training Hours:		
Course Material:	Video and Lecture	
	Federal Motor Safety Regulations Book & North American Emergency	
	Response Guidebook.	
Description:	Background information on using the NERG guidebook and review of the	
	FMSR.	

In addition, to the training drivers receive a copy of Federal Motor Safety Regulations book & the North American Emergency Response Guidebook.

#### ITEM 5 RECORD KEEPING

Documentation of training is in written form. These forms are kept in personnel files in each department.

#### ITEM 6 UPDATING TRAINING REQUIREMENTS

The training program is updated any time:

- Changes in federal, state or other regulatory agencies revise, change or publish addenda to applicable regulations.
- New operating equipment is added or emergency response plan of action is upgraded.
- Safety program is upgraded.

#### **INTEROFFICE MEMORANDUM**

Sensitivity: COMPANY CONFIDENTIAL

Date: 23-Jul-1998 09:09am From: Susan Pelz TPA Dept: Southwest District Office Tel No: (813)744-6100 ext. 386

To: Roger Evans TPA CC: Robert Butera TPA CC: Stanley Tam TPA

#### Subject: HOWCO

According to HOWCO's attorney, "Howco intends to process **only** "oily waste" that will fall within the scope of the Used Oil Processor permit." (letter Dated may 4, 1998 from Carlton, Fields) This letter also references Rick Neves memorandum dated March 5, 1998 on this issue.

However, based on the description provided in their latest submittal (item 2.3), it seems that they are intending to mange solid wastes "for disposal" and not for recycling, as is required for management under 62-710, F.A.C. Additionally, Attachment 5, item 5.3 describes the "acceptance of oil solids products from customers." The management of these "oily wastes" is clearly not "intrinsically linked to, or a byproduct of, a traditional used oil processing operation..." and the solid wastes described would not generally be described as "liquid used oil" (Neves memo, paragraph 4) and therefore should be regulated under 62-701, and not 62-710.

In order to provide consistent application of Rick Neves memorandum, and the requirements placed on similar facilities the Solid Waste Section's position is:

If the generation of solid waste is "intrinsically linked to, or a byproduct of, a traditional used oil processing operation..." then the facility may mange the solid waste as an incidental activity included in their used oil permit (under 62-710).

If the solid wastes are accepted from outside sources, whether or not they are processed through the used oil facility, the materials should be managed in accordance with 62-701, and a separate permit should be required.

If they intend on managing solid wastes pursuant to 62-701, and we are compelled to allow them to have only one permit, then I think we should co-review the entire application.

If you need more information, let me know. Susan

### **FAX TRANSMISSION**

#### HOWCO ENVIRONMENTAL SERVICES

3701 CENTRAL AVENUE ST. PETERSBURG, FL 33713 (813) 327-8467 Ext, 229 FAX: (813) 323-2249

Date:

Pages:

Pirons Company:

including this cover sheet.

To:

Fax #:

From:

Subject:

Judie Hayford Accounts Receivable ハイ AL

#### COMMENTS:

"...conserving limited natural resources through recycling while protecting the environment and public health and welfare." The

May 28, 1998

Roger Evans Department of Environmental Protection Southwest District 3804 Coconut Palm Drive Tampa, FL 33619

RE: Oil Permit Application

Dear Mr. Evans:

We respectfully request an extension until June 12, 1998 in order to compile our Operating Permit Application for your accurate comparison of the documents submitted in the original application.

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P.02

We thank you for your understanding, your previous assistance and guidance in preparation of our Operating Permit Application.

Sincesely, 1 jk Tim Hagan

President/CEO

TH/jh



May 13, 1998

Mr. Roger Evans, Engineer III Department of Environmental Protection Hazardous Waste Permitting 3804 Coconut Palm Drive Tampa, Florida 33619

Departingnu vi bir SOUTHWEST DISTRICT intal Protection BV

Dear Mr. Evans:

As per our conversation today, and in accordance with the department's request, HOWCO Environmental Services response to the second Notice of Deficiencies (NOD) will be formulated to include instructions on how to incorporate the response to each of the department's NOD.

HOWCO Environmental Services request to withdraw the last submittal dated, April 29, 1998. The new submittal will be submitted on or before May 29, 1998.

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

Sincerely,

in Tim Hagan

President

TH/db

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3701 Central Avenue – St. Petersburg, FL 33713 – Tel. 813-327-8467 Fax: 813-321-6213 Operations: Tampa Bay - Ocala - Ft. Myers – 24-Hour Emergency Access 1-800-435-8467

# APR 2 9 1998

## USED OIL

# PROCESSING

# FACILITY PERMIT

# APPLICATION

File 3-b 11/98

#### APPLICATION FORM FOR A USED OIL PROCESSING PERMIT PART II - CERTIFICATION

Form 62-710,901(d) P.E. Certification Complete when required by Chapter 471, F.S. and Rules 62-4.050, 62-761, 62-762, and 62-710, F.A.C.

Use this form to certify to the Department of Environmental Protection for:

- 1. Certification of secondary containment adequacy (capacity), structural integrity (structural strength), and underground process piping for storage tanks, process tanks, and container storage.
- 2. Certification of leak detection.
- 3. Substantial construction modifications.
- 4. Those elements of a closure plan requiring the expertise of an engineer.
- 5. Tank design for new or additional tanks.
- 6. Recertification of above items.

#### Please Print or Type

X Initial Certification

1. DEP Facility ID Number: FLD152-764-767

2. Tank Number: <u>See Table 3.1</u>

3. Facility Name: <u>HOWCO Environmental Services</u>

4. Facility Address: <u>843 - 43rd Street S.</u>, <u>St. Petersburg, FL</u>

\_ Recertification

This is to certify that the engineering features of this used oil processing facility have been examined by me and found to conform to engineering principles applicable to such facilities with the following exceptions: 1. Secondary containment structure No. 2 containing tanks 121 to 129 inclusive does not conform to engineering design requirements; 2. Secondary containment structures 1, 3, and 4 require repair and water proofing; and 3. Some oil storage tanks are riveted type and some exhibit minor structural deformations. In my professional judgment, this facility, when proper secondary containment structure replaces existing containment structure No. 2, and required repairs and water proofing of other secondary containment structures are in place, and when maintained and operated properly, or closed, will comply with applicable statutes of the State of Florida and rules of the Department of Environmental Protection.

Signature

Name (please type)

Florida Registration Number: P.E. 41412

Mailing Address: <u>6733 - 1st Avenue South</u> Street or P.O. Box

> <u>St. Petersburg, FL 33707</u> City State Zip

Date: 09/25/97 Telephone: (813)345-0080

(PLEASE AFFIX SEAL)

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#### **ATTACHMENT 1**

#### LIST OF DRAWINGS

#### 1.0 LIST OF FULL SIZE DRAWINGS

- D 4 1 FIRE FIGHTING EQUIPMENT LOCATION
- D 4 2 SPILL CONTAINMENT DIKES PLAN
- D 6 1 EMERGENCY CONTAINMENT NO 1
- D 8 1 PROCESS & STORAGE EQUIPMENT PLAN
- D 8 2 ESCAPE AND EVACUATION ROUTES
- 20782-6-TF-024 ST. PETERSBURG, FL MAP

PUBLISHED BY THE GEOLOGICAL SURVEY

#### 2.0 LIST OF REDUCED AND PARTIAL DRAWINGS

- D 6 2 EMERGENCY CONTAINMENT NO 2
- D 8 2 PLANT LOCATION PLAN
- D 8 2 REDUCED PRINT OF ESCAPE AND EVACUATION ROUTES

Haveo page 3-1 Indicates that a Manifest num ber will Atem 3. 1.3 be assigned when acceptance has been determined. This could be interperted to mean that an acceptance decision will be made on each shipment. What does Howco mean by Manifest? Item 3.3. How is the oil from the crushed fillers collected. (internal note - french at edge of concret) Hem 5.5. Indicates that all shipments are sampled and analy-tic results obtained prios to shopments being un lacded. Is this true? Numbering of samples ( Identification procedure, ) Hen 3.7.1 - Disposition of Solids from Vibrating Screen filler ? Hems 3.7.3 Waters are treated for what? Attachment W A. Analysis API What happens After individual samples are fation from each truck compartment?

TP3-261.4(b) - H.H.W - not RCCA are solid waste may need solid Waste Permit. deks) - CESQ6 waste excluded if used oil is processed to become or be burned for energy recovery. Does Howco ship processed oil to end use other than energy recovery?

1P5 - How many local of H.W has How co received? Ay Any hazardous waste received by Howco makes Howco the generator of this waste.

ITEM 3.9 - How are solids removed through decanting?

Sector Attachment 5

The attachment does not describe (specificity) the earth dogant -

USED OIL Processing PERMIT APPLICATION H052-308169 Howco -Review Comments Applicant submitted only one of the two applications. Lomments on PART I.A. 1. Applicant checked renewal instead of new 2 Revision place was left blank. This blank should be p" until my the permit is issued. Then the block should be changed each time the Part I is modified. 3. Applicant did not complete section # 3 A. Applicant should indicate theyear operations began all the facility S. Through 14 ok PAAT I.B no hat though St Pete To Not provided . Mop D-4-1 say "surrounding community" & - Should say have 2. Not provided on form - information on map D. 4-1 3. Not provided Section 2.0 10 kys -\*. PART T. C I. Not indicated completed 2. Not completed 3. Not provided Section 2. Not Privided 6K Slotion V 4. Section 2.1. Site Map a ~ 2 / 6 ~ 61 £ description page 4 - all feelstock are Tested tested for what, where how, now sompleded, when

questions for weath analysis plan

Howes . HOS2 308169 Part I.C 5. Analysis Plan (Separatel document) needs to be incorporately revision plack, etc Part (a) How are test results recorded , connected to a truck lacd container /to K maintained deiser artimitie Smiffer test for what constitutes positive? What is smithed same Show the - What is EPA Approved method is used ? Tested for what ? What actions are taken as a result of second test (Position and negative) Core Sample - how is sample obtained? That is , what type of sampling device is used? Part (b) Knowledge and Sampling

Section 3.0 C

2

Sampling - What device is used to abtain core sample,? How is sample patental record connected to sampled vehicle?

Knowledge - what Knowledge is used? How is this Knowledge recorded ? How frequently is the knowledge verified? Toi) where are Asamples taken? What are the samples analyized for? 2(iii) monthy composite of what, where taken, when taken 2 it iv) used oil sample are forten of a had how are sample and results linked to product

HOWCO - HO52-308619

5.6.

Page 5 of Section 2 6 of Section 2 7 of Section 2 10 of Section 2 Page 12 of Section 2

5.c. - Section 3 page 15 How long are the records retained. The description of information to be rotained does not appear to include all the information required by 40 CFR 279,56

-6. a. Table 8-1 page 45 Section 3 6. Jable 8-1 C. page 20 Sertion of part 4.2 and Table 4-1 drawing D-4-1 4 (city fire hydram ts) d. page 20 Section 4 part 4/2 e. Not included F. Not identified 9 Joble 8-1 V h. Section 9 pages 55 2 Ft isle between rows je. (i) not indicated (i)hit included (iii) hat included (iu) por includer (vs pat included. À . page Section 6 page 34 inadequate

Howco H052-308619 Section 8. 7.a. Spire - Section 8.2 page 33 specifier actions to be taken by Incident Commanders It is not clean what, if any, actions uplant employees will take in response to firespon and explosions b. not mentioned C. Juble 8-2 page 46 name - phone numbers address - qualifications not provided d. page 40 c C. page 42 drawing D-4-1 (Table 4-1 fire) drawing D-4-1 does not indicate the location of the spill response equipment. f not specifically identified 9. Souting 8-2 page 43 section 9.2 page 39 item 6.4 states that incident commanter will ensure this is done, but does tolle about how it will be done. h. Section 9.3 page 39 plan 8.4 page 40 Routes Drowing D-8-2 The routes are indicited. However, the drawing also contains a large amount of other information that waswould make identifying the evacuation routes difficult. 4. Plun does not inducto that the oroutes are posted 1. Sectar K. Section 8.2 page 39 ites 6.6 pay information required by pargrop 4.3 will be provided. Paragorat 4.3 is Fire Emersony Requise and includes location of fire ext.

HO6500 HO52-308619 8. a. Container Management - Section 7 2 feet between each row of containes N. page 35 is not indicated ici. Not indicate 1 The plan does not clearly identify the location of containe storage, the presence of secondary containment, and nor is are these areas included in the inspection discussion. b. Tank. (no specific section) (attach non - Volume calculation and proces dia gran) 2 - Table 21 page 8 section 2. List of tanks, dimensions, use 62.762.510 (4) - meet 62.762.500 (3) (d), (e), (F) and (4) and (6) by 12.31.55 62-767. 500(3) (d) cathodic Protection (e) Exterior coating (F) overful protection 62-762. 520 (4) loading on loading areas - spill containment systems 62.762. 500 (6) Secondary Containment (a) impervious secondary containment system 1) imporvious - not adequite not discussed dimension verification defficielt 2) capacity 110% largest tank compliance por calculated 2) rain event 7 inches - not calculated (b) synthese time yorn wla (c) concrete - show be product tight - not discussed (d) material directed to monitoring points - not during (1) cky approved by FDEP. NIA 62.762.600 - leak detection (1) - lear detection system not provided some taxes set on slab (5) - leak detection system for piping not discussed 224 +2 - 226

6

materials content - satets b. documentation c. program revised to approve primes d. sche dala Lquarter 15 satets meetings

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·	Howco





Lawton Chiles Governor Southwest District 3804 Coconut Palm Drive Tampa, Florida 33619

Virginia B. Wetherell Secretary

#### SITE INSPECTION REPORT

OWNER/OPERATOR MAILING ADDRESS	<ul> <li>R: Mr. Lynn LeMasters (HOWCO)</li> <li>843 43rd Street South</li> <li>St. Petersburg, Fl. 33711</li> </ul>	
NAME OF SITE: SITE ADDRESS: CITY:	HOWCO Solid Waste Processing Facility same as above St. Petersburg, Fl.	INSPECTION DATE: January 9, 1998 PERMIT NO: none
REASON FOR VISIT • COMP • PERMI	: LIANCE INSPECTION <u>X</u> . TTING INSPECTION X.	
COMP PERSONS PRESENT	LAINT INVESTIGATION	Crawford, Roger Evans (FDEP), Lynn

**SUMMARY REPORT**: The purpose of this site visit was to assess the activities at the site with respect to the applicability of solid waste permitting.

Mr. LeMasters accompanied us throughout the site inspection. The site has an industrial wastewater treatment plant (discharge permitted by City of St. Petersburg?) in the east part of the site. The effluent from the treatment plant is discharged to the City of St. Petersburg POTW. This treatment plant includes several storage and process tanks which are also part of the used oil processing facility. A central collection system runs east-west through most of the site. Runoff from the paved areas (most of the site is paved) is collected in this collection system which flows from east to west to an oil/water separator/sump located at the west-central portion of the site. This runoff is "inspected" prior to ultimate discharge to the stormwater system. The sump inside the property discharges to an oil/water separator located just outside the south wall. This outside separator then discharges to the stormwater drain. Mr. LeMasters indicated that the sumps (oil/water separators) are valved, and runoff does not automatically discharge.

We observed the oil filter crushing operation. A trench drain exists south of the main site collection system. The south trench collects oil and oily waters from the oil filter crushing operation, the truck wash and the filter press. This oil/oily water collects in a sump (at the south-central part of the site) and is pumped to the wastewater treatment plant onsite.

We observed several drums stored along the south wall. Some drums were labeled "Non-Hazardous Waste," some were labeled "Waste Oil Absorbent Pads and Absorbent" and "Danger Hazardous Material." One of the drums from Grayco Environmental was opened. This drum contained "filter lint" reportedly from a used oil processing facility. Several cardboard drums were observed. These drums were from Florida Silica and Sand. A couple of these drums were opened, and they contained a fine white powder. The labels indicated that the material was an abrasive media (i.e. like sandblast grit). A few gray drums from Valcool were observed. These

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### Department of Environmental Protection

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Lawton Chiles Governor		Southwest District 3804 Coconut Palm Drive Tampa, Florida 33619	Virginia B. Wetherell Secretary
DATE:	1-27-98		
TIME:	10:00 AN	2	
SUBJECT:	HOWCO .	Review Response To 2"	ad NOIS
		ATTENDEES	
<u>_N</u>	ame	Affiliation	Telephone
Bill (rowf	ar d	FDEP	813-744-6100 × 372
V. W. DJO.	RDJEVIC	Howes	323-0818 ET 226
Lund Le	MASTERS	Howes	11 4
Tim HAG.	AN	Howco	11 12
Roger Eve	ans	FDEP	744 - 6100
Stanley	Tam	FDEP	744-6100, X-390
Facility qi Response	anted 90-days due April 27,	extension of time to respond 1998.	1 to 2nd NOB per Bill Crowford
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		1. 	

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Departme	ent of
Environmental	Protection

AND FIT

Lawton Chiles Governor		Southwest District 3804 Coconut Palm Drive Tampa, Florida 33619	Virginia B. Wetherell Secretary
DATE:	12/10/97		
TIME:	2:30 pm		
SUBJECT:	Howeo -	Discussion of 2nd NO	0
		<u>A T T E N D E E S</u>	
N	ame	Affiliation	Telephone
Bill Craw	freed	FDC2	813-744-6104×372
Stanley To	ам	FDEP	(813) 744-6100, X-390
Tim Ha	9 AN	Howco	327.8467
LYNN he	MASTONS	How es	328-1803
V. W. DJO	RDJEVIC	HOWCO	345-0080
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File 3-b 8/97

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Lawton Chiles Governor Southwest District 3804 Coconut Palm Drive Tampa, Florida 33619

Virginia B. Wetherell Secretary

October 24, 1997

Tim Hagan, President Howco Environmental Services 3701 Central Avenue St. Petersburg, Florida 33713

> RE: Howco Environmental Services, FLD 152 764 767 Operating Permit Application HO52-308139 Second Notice of Deficiency

Dear Mr. Hagan:

The Florida Department of Environmental Protection (FDEP) has completed its review of the referenced application as revised on September 25, 1997, and determined that the information submitted is not complete. The information needed to complete the application is itemized in the attached Notice of Deficiency.

When a permit application is incomplete, all processing of the application is suspended. You are hereby advised to provide us with the necessary additional information, pursuant to the Florida Administrative Code (FAC) Rule 62-710.800 and Chapter 403.769 Florida Statutes (FS).

The deficiencies noted in the attached Notice of Deficiency constitute a violation of FDEP rules. Failure to correct these deficiencies within 45 days could subject you to formal enforcement action. If you cannot submit this information in 45 days, you must provide a schedule with dates indicating when this information will be submitted. If a complete response to each item is not submitted within the time frame given above, the FDEP will issue a Notice of Violation, begin the formal process to deny the permit pursuant to Section 120.60, FS, or take other appropriate actions.

The response made by Howco Environmental Services (Howco) to each item shall be as noted in Section 62-710.800(6), FAC which details the Certification of plans, specifications and other related documents supporting the permit application by a professional engineer registered in the State of Florida.

In addition, each response must note that a revision has been made (a revised date in the revision block, the revision number should remain "0" until the application is deemed complete) and the response must be labeled and numbered such that it can be placed in the appropriate section application. This might necessitate the submittal of a new table of contents reflecting the revisions and correct page numbers.

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Howco Environmental Services Notice of Deficiency Page 3

#### Notice of Deficiency

#### Part I-A 1

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Two locations were checked as applicable. The renewal location should be left empty.

#### Part 1-B-3

The map indicating the location of the 100 - year flood plan could not be located. A topographic map depicting the location of the 100 - year flood plan, and the source of the information must be included in the application.

#### Part I-C.4 (Attachment 3)

The application does not discuss the generation, capture or reuse of the off-gasses generated during the distillation process. This information should be included in this application, and the application should describe how this information is presented to the FDEP air section. The detail description of the process has been rewritten and the relationship to previously submitted information (which describes processing based on weight percentage water) is not clear. The application must describe the management of each separate stream.

Item 3.8 and 5.2. The application has been revised to include a general description of the management of the solids generated by SWECO oil / solid separator. The description does not provide sufficient details on the processing, solidification and disposal of these solids.

Item 3.7.2. The application states that oil recovered from the emulsion breaking treatment is pumped directly into the product storage tank. The fate of the emulsion breaking chemicals should be discussed.

Item 3.7.3. The discussion of used oil decanting from the tanks in the waste water treatment facility has been removed. Has Howco discontinued this practice, and if so what are the new procedures?

Attachment 5. The application should describe the fate of the dewatering liquid removed from process sludges.

Item 2.3. This item references a sludge processing facility. This facility was not identified on the site plan. Is this facility the sludge drying bed? The description does not match previous descriptions provided during meetings and site visits. Additionally, the process associated with the sludge drying bed should be described. The management of all waste streams should be identified.

Item 2.4 The application should describe how the oil from the compacted filters is recovered.

Attachment 4 (Waste Analysis Plan)

Howco Environmental Services Notice of Deficiency Page 5

The description must include how the facility will manage the records of this familiarization.

Specific questions on items related to facility preparedness and prevention are identified below:

Item 7.1. The application must identify the schedule for the upgrading of the containment systems for the tank systems.

Are drivers required to be present when loading and unloading trucks and or containers? What type of communication is available to the drivers during unloading and loading operations? Are loading or unloading operations conducted with only the driver present at the facility?

Item 8.5.9. As described, the only incident requiring a written report would be a release of oily material that leaves the property. The reporting requirements of 62-710 FAC, 62-762 FAC, and 40 CFR 279 should be reviewed to determine when a spill or release must be reported, and the application revised as necessary.

Attachment 8 (Contingency Plan)

The contingency plan as presented does not include all the information requested in the instructions for completion of the application. The information not identified and specific questions of the information in the contingency plan are identified in the following comments. The item numbers are references to the instructions for completion of the application form.

- Item 7.a The application only presents the specific actions to be taken by the Incident commandeer in response to fire and explosions. Action to be taken by other employees must be included.
- Item 7.b The description of the emergency response arrangements is not presented.
- Item 7.c The qualifications of the emergency response coordinators are not presented.
- Item 7.e The plan includes a list of equipment available during an emergency, but does not describe the capabilities of the equipment nor is the location of the spill response equipment identified on a facility map.
- Item 7.f The location of tanks and containers specifically dedicated for the storage of spill or released materials is not identified.
- Item 7.h The application does not indicate that the evacuation routes are posted in the plant and should be revised to indicated where copies of the evacuation routes will be posted.



Page 7

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The closure plan discusses the taking of soil samples from location of visual soil staining at the facility. The application must include a discussion of mandatory soil sampling and contingent groundwater sampling. The plan should also include any additional actions the facility will take should contaminated soils or groundwater be identified during the sampling.

#### Training

The training plan for the facility could not be located, and must be included as a portion of the application.



"...conserving limited natural resources through recycling while protecting the environment and public health and welfare." TM

September 25, 1997

RECEIVED SEP 25 1997 DEP

Bill Crawford Department of Environmental Protection 3804 Coconut Palm Drive Tampa, FL 33619

Dear Mr. Crawford:

Enclosed please find two copies of HOWCO Environmental Services' permit application for your review and approval. If you have any questions, please don't hesitate to call me.

Sincerely. Jagan Im Tim Hagan

President/CEO

/jh

File 3-b 6/97

3701 Central Avenue • St. Petersburg, FL 33713 • (813) 327-8467 • 1-800-435-8467 • Fax 1-813-323-2249

#### APPLICATION FORM FOR A USED OIL PROCESSING FACILITY PERMIT

Part I

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

#### A. General Information

1.	New X	Renewal X	Modification	Date old permit expires	
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2. Revision number

3. NOTE: Processors must also meet all applicable subparts, (describe compliance in process SEP 25 1997 description for applicable standards) if they are:

- X generators (Subpart C)
- X transporters (Subpart E)
- X burners of off-spec used oil (Subpart G)
- X marketers (Subpart H)
- or
  - X are disposing of used oil (Subpart I)
- 4. Date current operation began: 1972

5. Facility name: HOWCO ENVIRONMENTAL SERVICES

- 6. EPA identification number: FDL 152-764-767
- 7. Facility location or street address: <u>B43 43RD STREET SOUTH, ST. PETERSBURG, FLORIDA</u>
- 8. Facility mailing address:

3701 CENTRAL AVENUE	•TZ	PETERSBURG	FLORIDA	ELTEE A	
Street or P.O. Box		City	State	Zip Code	

9. Contact person: TIM HAGAN Telephone: @13\_827-8467 Title: PRESIDENT Mailing Address:

SAME AS ABOVE

Street or P.O. Box

10. Operator's name: SAME AS ABOVE \_\_\_\_\_ Telephone: (\_\_\_\_\_\_ Mailing Address:

City

City

State

State

Zip Code

Zip Code

Street or P.O. Box

Mailing Address: 3701 CENTRAL AVENUE ST. PETERSBURG, FLORIDA 33713 City State Zip Code Street or P.O. Box

12 Legal structure:

X corporation (indicate state of incorporation) \_\_\_\_\_FLORIDA

individual (list name and address of each owner in spaces provided below)

partnership (list name and address of each owner in spaces provided below)

other, e.g. government (please specify)

If an individual, partnership, or business is operating under an assumed name, enter the county and state where the name is registered: County State Name: Mailing Address: City State Zip Code Street or P.O. Box Name: Mailing Address: Zip Code City State Street or P.O. Box Name: Mailing Address: City Zip Code State Street or P.O. Box Name: Mailing Address: Zip Code City State Street or P.O. Box . 13 Site ownership status: []owned []to be purchased []to be leased \_\_\_\_\_ years [ ]presently leased; the expiration date of the lease is:\_\_\_\_ If leased, indicate: Land owner's name: TIMCO REAL ESTATE Mailing Address: ST PETERSBURG, FLORIDA 33713 3701 CENTRAL AVENUE City State Zip Code Street or P.O. Box 14 Name of professional engineer V.W. DJORDJEVIC Registration No. PE 0041412 Mailing Address: ST. PETERSBURG, FLORIDA 33707 HTU02 JUNAVA TZI EECA Zip Code City State Street or P.O. Box Associated with: V.W. DJORDJEVIC, P.E. **B. SITE INFORMATION** 1. Facility location: County: PINELLAS Nearest community: (TTY OF ST. PETERSBURG Longitude: AP:41:32 Latitude: 27:45:47\_ Range: 16E Township: \_\_\_\_\_\_ Section: 1,7 1,72 UTM # 2. Facility size (area in acres): \_\_\_\_\_\_ACRES\_\_\_\_\_
3. Attach a topographic map of the facility area and a scale drawing and photographs of the facility showing the location of all past, present and future material and waste receiving, storage and processing areas, including size and location of tanks, containers, pipelines and equipment. Also show incoming and outgoing material and waste traffic pattern including estimated volume and controls.

#### C. OPERATING INFORMATION

1. Hazardous waste generator status (SQG, LQG) N/A\_\_\_\_

2. List applicable EPA hazardous waste codes:

N/A

3. Attach a brief description of the facility operation, nature of the business, and activities that it intends to conduct, and the anticipated number of employees. No proprietary information need be included in this narrative.

A brief description of the facility operation is labeled as Attachment \_\_\_\_\_\_

4. Attach a detailed description of the process flow should be included. This description should discuss the overall scope of the operation including analysis, treatment, storage and other processing, beginning with the arrival of an incoming shipment to the departure of an outgoing shipment. Include items such as size and location of tanks, containers, etc. A detailed site map, drawn to scale, should be attached to this description. (See item 4, page 4).

The facility's detailed process description is labeled as Attachment  $\_\exists \cdot \Box$ 

- 5. The following parts of the facility's operating plan should be included as attachments to the permit application. (See item 5 on pages 4 and 5):
  - a. An analysis plan which must include:
    - (i) a sampling plan, including methods and frequency of sampling and analyses;
    - (ii) a description of the fingerprint analysis on incoming shipments, as appropriate; and
    - (iii) an analysis plan for each outgoing shipment (one batch/lot can equal a shipment, provided the lots are discreet units) to include: metals and halogen content.

The analysis plan is labeled as Attachment \_\_\_\_\_\_

b. A description of the management of sludges, residues and byproducts. This must include the characterization analysis as well as the frequency of sludge removal.

Sludge, residue and byproduct management description is labeled as Attachment 5.0

c. A tracking plan which must include the name, address and EPA identification number of the transporter, origin, destination, quantities and dates of all incoming and outgoing shipments of used oil.

The tracking plan is included as Attachment \_\_\_\_\_

6. Attach a copy of the facility's preparedness and prevention plan. This requirement may be satisfied by modifying or expounding upon an existing SPCC plan. Describe how the facility is maintained and operated to minimize the possibility of a fire, explosion or any unplanned releases of used oil to air, soil, surface water or groundwater which could threaten human health or the environment. (See item 6, page 5).

The preparedness and prevention plan is labeled as Attachment \_\_\_\_\_\_

 Attach a copy of the facility's Contingency Plan. This requirement should describe emergency management personnel and procedures and may be met using a modifying or expounding on an existing SPCC plan or should contain the items listed in the Specific Instructions. (see item 7 on pages 5 and 6).

The contingency plan is labeled as Attachment \_\_\_\_\_\_\_

8. Attach a description of the facility's unit management for tanks and containers holding used oil. This attachment must describe secondary containment specifications, inspection and monitoring schedules and corrective actions. This attachment must also provide evidence that all used oil process and storage tanks meet the requirements described in item 8b on page 6 of the specific instructions, and should be certified by a professional engineer, as applicable.

The unit management description is labeled as Attachment \_\_\_\_\_\_

 Attach a copy of the facility's Closure plan and schedule. This plan may be generic in nature and will be modified to address site specific closure standards at the time of closure. (See item 9, pages 6 and 7).

The closure plan is labeled as Attachment \_\_\_\_\_\_\_

10. Attach a copy of facility's employee training for used oil management. This attachment should describe the methods or materials, frequency, and documentation of the training of employees in familiarity with state and federal rules and regulations as well as personal safety and emergency response equipment and procedures. (See item 10, page 7).

A description of employee training is labeled as Attachment \_\_\_\_\_



# APPLICATION FORM FOR A USED OIL PROCESSING PERMIT

#### PART II - CERTIFICATION

#### TO BE COMPLETED BY ALL APPLICANTS

#### Form 62-710.901(a). Operator Certification

Facility Name: HOWCO ENVIRONMENTAL SERVICES EPA ID# FLD 1.52-764-767

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

Signature of the Operator or Authorized Representative\*

200

Name and Title (Please type or print)

Date: 09/25/17 Telephone: (A1,3) 327-A467

\* If authorized representative, attach letter of authorization.

 DEP Form#
 62-710.901(b)

 Form Title
 Used Oil Processing Facility

 Permit Application

 Effective Date
 December 23, 1996

## **APPLICATION FROM FOR A USED OIL PROCESSING PERMIT**

#### PART II - CERTIFICATION

#### Form 62-710.901(b). Facility Owner Certification

Facility Name: HOWCO ENVIRONMENTAL SERVICES EPA ID# FLD 152-764-767

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

Signature of the Facility Owner or Authorized Representative\*

TIM HAGAN, PRESIDENT Name and Title (Please type or print)

Date: 09/25/97 Telephone: (A13) 327-A467

\* If authorized representative, attach letter of authorization.



## **APPLICATION FROM FOR A USED OIL PROCESSING PERMIT**

#### **PART II - CERTIFICATION**

#### Form 62-710.901(c) Land Owner Certification

Facility Name: HOWCO ENVIRONMENTAL SERVICES EPA ID# FLD 152-764-767

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

Signature of the Land Owner or Authorized Representative\*

TIM HAGAN, PRESIDENT Name and Title (Please type or print)

Date: 09/25/月7 Telephone: (813) 327-8467

\* If authorized representative, attach letter of authorization.



02-110.901101 Used Oil Processing Facility Permit Application December 23, 1996

#### APPLICATION FORM FOR A USED OIL PROCESSING PERMIT **PART II - CERTIFICATION**

Form 62-710,901(d) P.E. Certification [Complete when required by Chapter 471, F.S. and Rules 62-4.050, 62-761, 62-762, and 62-710, F.A.C.]

Use this form to certify to the Department of Environmental Protection for:

- Certification of secondary containment adequacy (capacity), structural integrity (structural strength), 1. and underground process piping for storage tanks, process tanks, and container storage.
- Certification of leak detection. 2.
- 3.
- Substantial construction modifications. Those elements of a closure plan requiring the expertise of an engineer. 4.
- Tank design for new or additional tanks. 5.
- Recertification of above items. 6.

#### Please Print or Type

Initial Certification Recertification

1. DEP Facility ID Number: FLD152-764-767

2. Tank Number: All tanks at this plant

3. Facility Name: HOWCO Environmental Services

4. Facility Address: 843 - 43rd Street South, St. Petersburg, Florida

This is to certify that the engineering features of this used oil processing facility have been examined by me and found to conform to engineering principles applicable to such facilities with the following exceptions: and found to conform to engineering principles applicable to such facilities with the following exceptions. 1. Secondary containment structure No. 2 containing tanks 121 to 129 inclusive does not conform to engineering design requirements; 2. Secondary containment structures 1, 3, and 4 require repair and water proofing; and 3. Some oil storage tanks are riveted type and some exhibit minor structural deformations. In my professional judgment, this facility, when proper secondary containment structure replaces existing containment structure No. 2, and required repairs and water proofing of other secondary containment structures are in place, and when maintained and operated properly, or closed, will comply with applicable structures of the State of Elorida and rules of the Department of Environmental Protection statutes of the State of Florida and rules of the Department of Environmental Protection.

7/ W Signature V.W. DJORNJEVIC

Name (please type)

Florida Registration Number: P.E. 41412

Mailing Address: 6733 - 1st Avenue South Street or P.O. Box

> St Petersburg FL 33707 City State Zip

Date: \_\_\_\_09/25/97\_\_\_ Telephone: \_\_\_(813) 345-0080

(PLEASE AFFIX SEAL)

V. W. Spandjerge 9-24-1997

# **FAX TRANSMISSION**

# HOWCO ENVIRONMENTAL SERVICES

3701 CENTRAL AVENUE ST. PETERSBURG, FL 33713 (813) 328-2410 Ext. 226 Fax: (813) 328-1939

William Crawford Date: Dest. of Preversame To: ATTON Company: 2 including this cover sheet. Pages: Fax #: Tim Hagan From: President/CEO *PR* # 4052-308139 Subject: COMMENTS: extension ok 2 copies of revised application needs

FLORIDA	Env	Department of ironmental Prote	• ection
Lawton Chiles Governor		Southwest District 3804 Coconut Palm Drive Tampa, Florida 33619	Virginia B. Wetherell Secretary
DATE:	8/8/97	r	
TIME	1:20		
SUBIECT.	Hawco	- Discussion of 157	
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	-	<u>A I I E N D E E S</u>	
<u>_Na</u>	me	Affiliation	Telephone
Roger Evans		FDEP	744-6100
V. W. DJORDJEVIC		V.W. DJORDJEVIC P.E.	345-0080
LyNNLo MASTERS		He wer - Plant Mgr.	328 - 1803
Bill Crawford		FDED	813-744-6100 × 372
KICHARD J	): LIEN	HOWED - LAB CHEIRST	328-7403
Jem H	Jagan	Howco Pres	11 21
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Department of Environmental Protection

Lawton Chiles Governor Southwest District 3804 Coconut Palm Drive Tampa, Florida 33619

July 22, 1997

Virginia B. Wetherell Secretary

File 3-6

Tim Hagan, President Howco Environmental Services 3701 Central Avenue St. Petersburg, Florida 33713

> RE: Howco Environmental Services, FLD 152 764 767 Operating Permit Application HO52-308139 First Notice of Deficiency

Dear Mr. Hagan:

The Florida Department of Environmental Protection (FDEP) has completed its review of the referenced application and determined that the information submitted is not complete. The information needed to complete the application is itemized in the attached Notice of Deficiency.

When a permit application is incomplete, all processing of the application is suspended. You are hereby advised to provide us with the necessary additional information, pursuant to the Florida Administrative Code (FAC) Rule 62-710.800 and Chapter 403.769 Florida Statutes (FS).

The deficiencies noted in the attached Notice of Deficiency constitute a violation of FDEP rules. Failure to correct these deficiencies within 45 days could subject you to formal enforcement action. If you cannot submit this information in 45 days, you must provide a schedule with dates indicating when this information will be submitted. If a complete response to each item is not submitted within the time frame given above, the FDEP will issue a Notice of Violation, begin the formal process to deny the permit pursuant to Section 120.60, FS, or take other appropriate actions.

The response made by Howco Environmental Services (Howco) to each item shall be as noted in Section 62-710.800(6), FAC which details the Certification of plans, specifications and other related documents supporting the permit application by a professional engineer registered in the State of Florida.

In addition, each response must note that a revision has been made (a revised date in the revision block, the revision number should remain "0" until the application is deemed complete) and the response must be labeled and numbered such that it can be placed in the appropriate section of the submitted application. This might necessitate the submittal of a new table of contents reflecting the revisions and correct page numbers.

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





Two copies of your response shall be submitted to the FDEP office in Tampa, Florida. You are encouraged to contact this office to discuss the deficiencies noted by the application review. This exchange of ideas will assist you in developing a complete and adequate response.

Should you like to arrange a meeting or if you have any questions, please contact me at 813 744-6100 extension 372.

Sincerely, William C. Crawford

Permitting Engineer Hazardous Waste Section Division of Waste Management

Attachment

cc: Raoul Clarke, Administrator, FDEP - Tallahassee Satish Kastury, Administrator, FDEP - Tallahassee

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#### Notice of Deficiency

#### General Comments:

The FDEP, as agreed, reviewed the Howco document submitted in support of the notice of intent to use a General Permit. This document is the Howco Spill Prevention Control and Countermeasure and Contingency Plan (SPCC&C) identified as Revision 4, January, 1996. The information requested in the new used oil processor permit is broader and more specific than was required by the permitting process for the General Permit. The comments and questions prepared as a result of the review of this document are intended to aid in the preparation of an acceptable application.

Each section of the application form should provide a reference to the location within the application that contains the necessary information.

#### Part I-A 1

Howco has operated under the requirements of a Florida General Permit in the past, but this application and subsequent permit will be the first used oil program specific permit. This block should be checked new.

#### Part I-A 2

The information requested in this item was not provided. As noted in the cover letter, this item and all pages of the application should indicate revision '0' until the application is deemed complete.

#### Part I-A 3

The information requested in this item was not provided.

#### Part I-A 4

The year that used oil processing began at this facility should be indicated instead of the general time frame provided.

#### Part I-B 1

The information requested in this item was not presented in the spaces provided. The information on the included blue prints indicated that 'surrounding community' was the nearest community. The application is looking for the identity of the nearest governmental agency.

#### Part I-B 2

The information requested in this item was not presented in the spaces provided. The information was provided on the included blue prints, but must also be inserted or referenced in the blanks.

#### Part I-B 3

Section 2 of the SPPC&C gives a detailed description of the plant operation. The section did not include any topographic or scale maps of the facility, or a map indicating the 100 year flood plane. A copy of an FID or FEMA map for this area should be included.

#### Part I-C 1

The application does not indicate the hazardous waste generator status of the site. Please note that this question address all aspects of the facility operations, and a response is required in this and item I-C 2.

#### Part I-C.3 (Section 2)

The overview of plant operations should include an estimate of the number of employees.

#### Part I-C.4 (Section 2)

The application does not discuss the generation, capture or reuse of the off-gasses generated during the distillation process. This information should be included in this application, and the application should describe how this information is presented to the FDEP air section.

Line 4, Paragraph 1, page 5, Section 2.1.1. The application should describes the management s of the solids generated by SWECO oil / solids separator.

Line 5, Paragraph 1, page 5, Section 2.1.1. This sentence implies that all batch tanks of oil are sampled and analyzed. The waste analysis plan indicates that product knowledge may be used to determine product oil specifications. Please revise the application to have a consistent description of product sampling and analysis.

Line 1, Paragraph 2, Page 7, Section 2.1.3. The application states that oil recovered from the emulsion breaking treatment is pumped directly into the product storage tank. The fate of the emulsion breaking chemicals should be discussed.

Line 4, Paragraph 2, 6, Section 2.2. The annex containing the discharge limits for the St. referenced referenc

Paragraph 5, Page 9, Section 2.2. The application indicates that materials being processed in the waste water treatment facility are tested. The application should describe the analysis performed on these wastes.

Line 2, Paragraph 1, Page 10, Section 2.2. The application should describe how the oil is biscussion of decanted from the tanks in the waste water treatment facility.

Page 10, Section 2.2. The management of the solids and contaminated sands generated by the waste water treatment process should be described.

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Line 1, Paragraph 2, Page 12, Section 2.3. The application should describe the fate of the X dewatering liquid removed from process sludges.

Line 2, Paragraph 2, Page 12, Section 2.3. The application should describe the range of and or description of 'proper disposal' facility.

Line 4, Paragraph 3, Page 12, Section 2.3. The process associated with the sludge drying bed X should be described. The management of all waste streams should be identified.

Line 1, Paragraph 1, Page 13, Section 2.4. The application should describe how the oil from *Jer* 

Part I-C.5a (Waste Analysis Plan - Separate Document) (allacher 4)

The waste analysis plan should be a specific section of the application.

The plan must include a description of the sampling frequency, sampling methods, and parameters to be identified.

The fingerprinting procedures for shipments arriving at the facility must be described.  $\checkmark$ 

The description of the sampling plan for out going materials must include sampling frequency, sampling method, and parameters to be identified. Additionally, the plan  $\checkmark$  presented indicates that product knowledge will be used to make the on/off specification determination. The application must describe the basis for using product knowledge, and  $\times$  how this information is updated.

The following items are specific comments on the plan as presented.

Part (a)

How are the test results recorded?

How are the test results related to a specific sample, truck and customers that contributed to the materials on the truck?

How and where are the test results maintained?

Part (b)

What sampling device is utilized to obtain the core sample?

How are the test results associated with a specific tank, and with truck loads that are  $\checkmark$  removed from that tank between sampling?

What is the basis for the use of "product knowledge" as a basis for on-specification used  $\times$  oil fuel determination? How is this information recorded? How frequently is this information updated?

Where are the before and after samples taken and what parameters are identified in the  $\times$  analysis?

What is the monthly composite? Where are the samples taken? What size samples are taken? What is the criteria used to select the tanks to be sampled?

Section 3, Standard Operating Procedures, contains some information regarding the prequalification process, the driver responsibilities when picking up a shipment of used oil from the customer, and sampling of the shipment at the Howco facility. The following question relate to Section 3.

The application must include an example of the waste profile sheet.  $\checkmark$ The description of prequalification procedures indicates that sampling results for each waste stream should be available at Howco. The application should discuss the retention and availability of the sampling test results.

The description of driver responsibilities at the customer does not include the actions the  $\times$  driver will take should the second test indicate the presence of unacceptable halogen contamination. The description should describe the specific EPA test method to be use in  $\checkmark$  the second test for a shipment that fails the physical inspection and sniffer test. How are the samples of non-Howco transported shipments identified, what parameters are  $\times$ 

identified in the testing, and how are the records managed?

The application indicates that manifest are prepared upon receipt of the waste. The application should define what 'receipt' means ( pick-up from the generator, arrival at the facility, etc.). The application should include an example of the transportation document, and how this document is managed.

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Part I-C.5b (attachmat 5)
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The application must include a detailed plan for the management of the solids (those generated on site and those received from off site) at the facility. This plan must include detailed descriptions of the processes and equipment used, the sampling plan to determine the waste classification of the byproducts, and details of the disposal of all waste streams.

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Part I-C.5c (attach ment ()
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The application must include a description of the used oil tracking plan. The description must include a copy of the 'typical' form used to track the movement of used oil into and out of the facility, and a records retention policy.

#### Part I-C.6 (Preparedness and Prevention) $(14ah_{m}h_{m}) \gamma$

The application did not indicate where the information required to satisfy the requirements of this part was located within the SPCC&C. Some of the information is available in various locations within the SPCC&C but should be consolidated into a specific location.



- Item 6.e The inspection, testing and maintenance of the emergency equipment is not discussed.
- Item 6.f Access to communication devices at all times is not discussed.
- Item 6.i Arrangements with local authorities is incomplete. The application must describe the actions Howco has taken to familiarize local authorities with the facility and its preparedness, prevention and emergency response procedures. The description must include how the facility will manage the records of this familiarization.

Specific questions on items related to facility preparedness and prevention.

Line 2, Paragraph 3, Section 4.1, Page 17. The application must justify the statement that  $\times$  the containment walls around the tanks are impervious to oil and water.

Page 31, Section 6.2. Are drivers required to be present when loading and unloading trucks and or containers? What type of communication is available to the drivers during unloading and unloading operations? Are loading or unloading operations conducted with only the driver present at the facility?

Page 23, Section 5. The definitions of spill classification on this page are different from the definitions on page 34, Section 6.5. Additionally, the page indicates that three definitions are used but only two are presented.

Line 1, Paragraph 1, Page 37, Section 8.1. The containment and control program could not  $10^{-3}$  be located in the SPCC&C.

Paragraph 1, Page 51, Section 10.1. As described, the only incident requiring a written report would be a release of oily material that leaves the property. The reporting requirements of 62-710 FAC, 62-762 FAC, and 40 CFR 279 should be review to determine when a spill or release must be reported, and the application revised as necessary.

Part I-C.7 (Contingency Plan)

The contingency plan as presented does not include all the information requested in the instructions for completion of the application. The information not identified and specific questions of the information in the contingency plan are identified in the following comments.

Item 7.a The application only presents the specific actions to be taken by the Incident commandeer in response to fire and explosions. Action to be taken by other employees must be included.

Item 7.b The description of the emergency response arrangements is not presented.

Item 7.c The qualifications of the emergency response coordinators is not presented.

- Item 7-e The plan includes a list of equipment available during an emergency, but does not describe the capabilities of the equipment nor is the location of the spill response equipment identified on a facility map.
- Item 7.f The location of tanks and containers specifically dedicated for the storage of spill or released materials is not identified.
- Item 7.h The facility evacuation routes are identified on Drawing D-8-2. The amount of information contained on this drawing makes it difficult to quickly and easily identify the evacuations routes. The application does not indicate that the evacuation routes are posted in the plant and should be revised to indicated where copies of the evacuation routes will be posted.

This plan does not specify where copies of the plan will be maintained at the facility, and does not describe the conditions that will require modification of the plan.

Part I-C.8 (Unit Management)

Containers (Section 7)

The application does not describe, nor clearly indicate on a facility map, the location of the container storage area. This description should include details of construction, engineering drawings with cross section, and the features that make the area impervious to water and used oil.

The application does not include the inspection checklist used to inspect the container storage area(s), and record any corrective action taken or needed to be taken.

Paragraph 1, Page 35, Section 7. This paragraph states that 85 gallon (or smaller) containers will be used to manage sludge, wasted handling and storage. This statement indicates that these materials are not managed in one ton totes, rolloffs, trucks and other devices. This section should be revised as necessary.

Tanks (No specific section)

Table 2-1, Page 8, Section 2. This table identifies the tanks at the facility, but does not provide any information on the materials of construction or construction specifications. The application must describe the aspects of the tanks that demonstrate how the tanks comply with the requirements of 62-762.500(3)(d), (e), and (f) FAC.

The application must describe the piping system and how it complies with 62-762.500(4) FAC. The application must describe the secondary system and how it complies with 62-762.500(6) FAC. The application must describe the tank maintenance procedures and how repairs will be made in accordance with 62-762.700 FAC.

The inspection plan presented in Section 13 is a conceptual view of the safety program for the facility. The inspection plan should include the forms used by the inspectors to detect the safety hazardous discussed in the application and the specific equipment and operational systems to be inspected. The inspection forms should include any observations made during the inspection and the actions necessary to correct deficiencies detected during the inspection.

The application must describe the management of rain water that accumulates in the secondary containment areas at the facility.

Part I-C.9 (Closure Plan - Separate Document)

The application identified the tanks at the facility to be closed, but did not identify the other areas that will be closed.

The application did not describe the sampling to be conducted to document that decontamination of the unit management areas had been successful. The description should include specific sampling methods, sampling parameters, and analytical methods. The discussion of samples and sample location could be summarized in table form to ensure that the specific samples identified are all described.

The disposal of solids generated during the closure was not discussed in the closure plan.

The closure plan does not discuss soil sampling at the facility. The application must include a discussion of the soil sampling plan and additional actions the facility will take should contaminated soils be identified during the soil sampling.

Part I-C.11 (Training - 11)

The training plan identifies the contents of the training to be presented to the employees. The application should describe the specific regulatory rules that the training plan is designed to address.

Paragraph 3, Page 55, Section 11. The amount of time dedicated to Phase Two training must be identified.

The application should describe the formal aspects of the hands on training that provide the necessary training to the employees.

The application must describe the records used to document employees training and how these records will be managed.

The application should describe the management actions necessary to revise the training program to address regulatory changes.

H0/06



File 3-b

# Мемо

To: Department of Environmental Protection

From: Tim Hagan

Subject: Used Oil Processing Facility Permit

**Date:** June 19, 1997

Per Tim Hagan and V. Walter Djordjevic conversation with FDEP personnel Bill Crawford and Roger Evans on June 18, 1997:

For items B page 9, C page 10 & 11, and Part II Certification page 15 see previously submitted Spill Prevention Control and Countermeasure and Contingency Plan.