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Department of Environmental Protection
BY SOUTHWEST DISTRICT

USED OIL RECYCLING FACILITY

CLOSURE PLAN

PREPARED BY:

**HOWCO ENVIRONMENTAL SERVICES
843 43RD STREET SOUTH
ST. PETERSBURG, FL 33711**

EPA ID# FLD 152764767

OCTOBER, 1995

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The Company

HOWCO Environmental Services (HOWCO) is a wholly-owned subsidiary of Hagan Holding Company, a Florida based firm staffed with multi-disciplined professionals dedicated to improving the environment.

HOWCO offers over 20 years of environmental experience providing site remediation, used oil reclamation, industrial waste processing, and emergency spill response services.

HOWCO's primary goal is to effectively minimize impairment of public health and environment by providing complete affordability and often profitable avenues for proper, safe and legal recovery and disposal of wastes.

HOWCO Environmental Services capabilities include the following:

1. Used Oil reclamation
2. Industrial sludge solidification/stabilization
3. Industrial wastewater treatment
4. Petroleum contaminated soil recycling
5. Analytical service
6. Waste surveys
7. Emergency spill response
8. Fleet and field equipment

Description of Facility

HOWCO Environmental Services operates an Used Oil Recycling and Industrial Waste Treatment Facility in St. Petersburg, Florida. All applicable Permits, Licenses, and Certificates are contained in Appendix A.

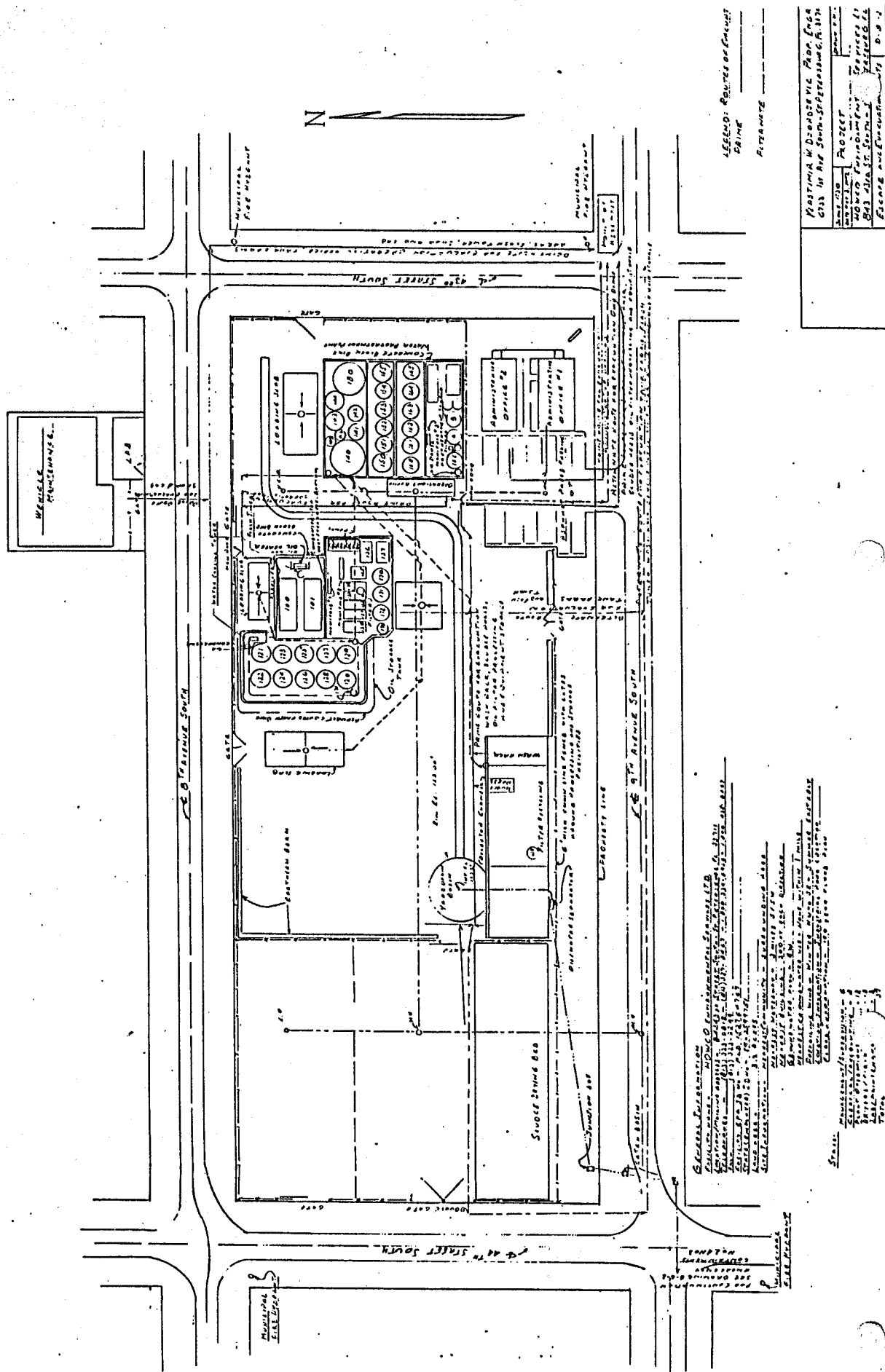
HOWCO's Recycling and Waste Facility is composed of a bermed asphalt containment area capable of storing 500 drums safely. HOWCO's above-ground tank farm can store and segregate up to 796,000 gallons of waste products. All these storage areas are located on contiguous sites and are addressed in HOWCO's Spill Prevention Containment and Countermeasure (SPCC) and Contingency Plan. The facility layout is depicted in Figure 1.

All waste stored on-site is processed on an on-going basis.. Any residual materials in the tanks are treated and processed through HOWCO's Industrial Waste Treatment Facility.

Standard Operating Procedures

HOWCO Environmental Services (HOWCO) operates 24 hours per day, seven days per week on

FIGURE 1



an as-needed or emergency basis. Normal working hours for receiving materials are Monday through Saturday 7:00 AM to 5:00 PM. HOWCO receives, handles and recycles used oils, industrial wastewater, industrial sludges, industrial solids, petroleum contaminated soil, used automotive oil filters and analytical samples at its St. Petersburg facility.

Prequalification:

The process begins with prequalification prior to arrival at the facility of all materials in accordance with all EPA, FDEP, and local laws and regulations. HOWCO has adopted the following waste profile procedures:

- A. HOWCO obtains a detailed physical description of the waste stream from the generator including Material Safety Data Sheets. This is documented on our Waste Profile sheet.
- B. Generators are required to prequalify their shipments. This can be effected in two ways:
 - (1) a sample of the material is forwarded to HOWCO for performance of Hazardous Characteristics Testing and Treatment Feasibilities Studies, or
 - (2) satisfactory analytical data from a certified lab must be submitted.
- C. After the determination has been made regarding the acceptance of the material, the generator is contacted to schedule transportation. If HOWCO is to perform

transportation, the designated HOWCO driver will physically inspect the material and monitor the material for halogens using a sniffer. If this test should prove to be positive, a second test will be performed using a Dexsil 4000 test kit before pumping. If this second test proves positive, the product is not pumped. The customer is notified and then assisted with arranging for proper disposal. Upon arrival at HOWCO's facility, a core sample of the waste must meet the prequalifying sample characteristics and/or the analytical data originally supplied. If the generator is transporting or has arranged independent transportation, the truck is stopped at the gate for representative sampling for matching with the original profile. If the waste in the transporting tanker matches the sample received, the waste is received into the facility and directed to its appropriate storage area to await its turn in processing.

Manifest System (upon receipt of waste):

- A. HOWCO signs and dates each copy of the manifest and/or bill of lading to certify that the waste described by the manifest and/or bill of lading has been received.
- B. Notes on the manifest and/or bill of lading and a discrepancy report will be filed internally to indicate significant discrepancies in the shipment.
- C. A copy is given to the generator certifying receipt by the transporter.
- D. A duplicate copy is kept by Howco.

HOWCO rejects and returns all wastes that are improperly packaged, do not match the waste profile or are suspect in any way.

Operating Records:

HOWCO maintains a written record at the facility which includes all wastes received or shipped in or out of the facility. Receiving/shipping information includes:

- A. Generator, transporter, and driver.
- B. Bill of lading number and manifest number.
- C. Quantity, type and condition of waste and receiving area number.

The outgoing product information includes customer and location, transporter, driver, manifest, date of shipment, total gallonage and batch number.

Security:

- A. Signs reading the legend "danger--unauthorized personnel keep out" are posted around the facility and at each entrance to the facility with emergency phone numbers.
- B. The entire facility is surrounded by a seven foot chain link and/or wooden fence.
- C. The gates are kept closed except when traffic is entering or leaving the facility.
- D. Centrally monitored electronic security devices are implemented and in operation during periods when the facility is unmanned.

General Inspections:

- A. HOWCO's plant manager provides daily plant inspections. Malfunctions, equipment

and structure deterioration, operator error, discharges, etc. are all handled according to written schedule.

- B. A remedial work order program is in place to ensure all malfunctions, deteriorations, operational errors and discharges are corrected in an appropriate time frame to assure that they do not project a threat to public health, safety, welfare or the environment.
- C. A drug screening program is implemented and includes operators of all company equipment.

Personnel Training:

All HOWCO employees are required to attend periodic OSHA, American Red Cross and HM-181 training programs which are given at the facility. All drivers and equipment operators are required to attend DOT courses and are reviewed by our Transportation Manager regularly. In addition, all technical personnel (depending upon job classification) are required to obtain certification and periodic upgrading in their respective disciplines. Training is provided by institutions qualified to offer certified CEU credits. Some training is provided by the following institution:

Occupational Safety Training (OST)

P.O. Box 28

Inverness, FL 32651-0028

Spill Prevention Control and Countermeasure (SPCC), Emergency Procedures and Prevention:

- A. A written SPCC plan is promulgated and is available for inspection at the facility.
- B. A written contingency plan is available for review and has been submitted to local police, fire departments and hospitals.
- C. The facility has the following emergency procedures in place:
 - 1. The facility is graded to slope gradually from north to southwest to a graded containment area.
 - 2. Communications and alarm system capable of providing emergency instruction are in place.
 - 3. Portable fire extinguishers, fire control equipment, and spill control equipment are in place.
 - 4. Adequate aisle space is maintained for unobstructed movement of personnel and equipment.
 - 5. The local police and fire departments have been familiarized with HOWCO's facility.
 - 6. No open flames are allowed. Smoking is allowed in designated areas only.
 - 7. Static grounding is in place.
 - 8. On-site temporary medical assistance by Red Cross trained employees.

Management of bulk oil storage tanks:

- A. All tanks are above ground.
- B. All tanks have secondary containment.

- C. All tanks are established on steel reinforced concrete pads.
- D. All tanks are labeled for identification.
- E. Tank levels are monitored by daily manual monitoring.
- F. Storage tanks are inspected daily; problems, if any, are addressed immediately.

Minimum Maintenance

All waste is stored in bermed areas and is inspected daily. Contained rainwater is collected and processed through HOWCO's Industrial Waste Treatment Facility. All berms, dedicated sumps, and contoured drainage areas are addressed in HOWCO's SPCC and Contingency Plan. All containment structures are designed for a twenty (20) year life with minimum maintenance.

Final Closure Plan

HOWCO has the financial reserves to guarantee closure of this facility. Wastes stored on site will be primarily used oil, wastewater and oil filters. Maximum closure costs are estimated to be \$75,000.00-\$100,000.00 including all waste disposal and analyticals.

Disposal/Decontamination of Facility

When it is apparent that closure of this facility is approaching, necessary preparations will be made for an orderly transition from “active” site operations made to “closure” of the site. Closure of the facility will require two independent activities:

1. Closure of above-ground storage tanks
2. Closure of drum storage pad

Upon decision of closure, all waste will be removed and disposed of at a licensed facility and the storage areas decontaminated by steam cleaning and processing wastewater through the Industrial Treatment Plant. A copy of this Closure Plan will be maintained on-site at all times during the active life of this facility.

Notification/Certification of Closure

Under normal conditions, closure of facility can be anticipated to allow for 180 days notice to all regulatory agencies in order to conduct a gradual, controlled closure. No wastes will be further accepted and all wastes presently on-site will be transported off-site to a licensed/permitted facility

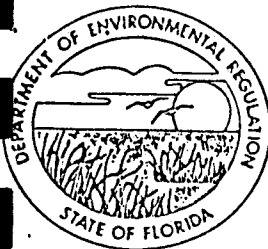
within 30 days. All buildings, tanks, and process equipment which once contained regulated waste will be decontaminated and moth-balled within 180 days of commencement of closure. Materials will be considered decontaminated based on washwater analysis and inspection by an independent Registered Engineer.

Closure Schedule

A 180 day notice of closure will be issued in writing to the Florida Department of Environmental Protection with any modifications to this Plan. Final monitoring of the facility groundwater wells will take place during this 180 day notice period. If monitor wells are clean there should be no need for Post-Monitoring.

Within 180 days of initiation of closure all waste will have been removed from the site, and all storage areas will be washed and cleaned, and certified clean and closed with written certification to FDEP.

APPENDIX A



Florida Department of Environmental Regulation

Southwest District • 4520 Oak Fair Boulevard • Tampa, Florida 33610-7347 • 813-623-5561

Bob Martinez, Governor

Dale Twachtman, Secretary

John Shearer, Assistant Secretary
Dr. Richard Garrity, Deputy Assistant Secretary

RECEIVED
12/24/90

DEC 21 1990

Mr. Tim Hagan, President
Tim's Oil Recovery, Ltd/
HOWCO Environmental Services, Ltd.
843 - 43rd Street South
St. Petersburg, Florida 33711

Re: Tim's Oil Recovery, LTD/HOWCO Environmental Services, Ltd
Used Oil Recycling Facility General Permit
General Permit No.: S052-189707, Pinellas County

Dear Mr. Hagan:

This letter acknowledges receipt of your Notice of Intent to use a General Permit for the subject project.

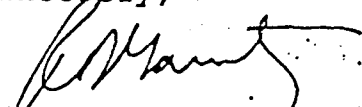
The notice was received by our office on November 30, 1990.

The proposed used oil recycling operation appears to qualify you to use the general permit for a Solid Waste Used Oil Recycling Facility pursuant to your submittal.

Please be advised that the general permit is subject to the requirements as specified in Sections 17-4.540 and 17-710.800, Florida Administrative Code.

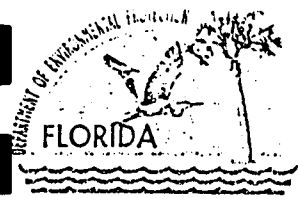
Please be advised that the activity must conform to the description contained in your Notice of Intent to use a General Permit and that any deviation therefrom will subject the permittee to enforcement action and possible penalties.

Sincerely,


Richard D. Garrity, Ph.D.
Deputy Assistant Secretary
Southwest District

RDG/egwb
Attachment

cc: Raoul Clarke, DER Tallahassee
Ernest Weeks, DER Tampa
Steve Morgan, DER Tampa



Department of Environmental Protection

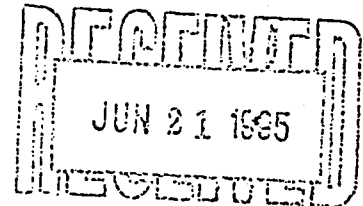
Lawton Chiles
Governor

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

Virginia B. Wetherell
Secretary

Mr. Tim Hagan
Howco Environmental Services-FM
843 43rd St S.
St. Petersburg FL 33711

June 14, 1995



BE IT KNOWN THAT

Howco Environmental Services-FM

IS HEREBY REGISTERED AS A USED OIL
Transporter, and Transfer Facility

in compliance with Chapter 62-710, Florida Administrative Code (F.A.C.)

The Department of Environmental Protection hereby issues

Registration Number FL000100611 on June 14, 1995

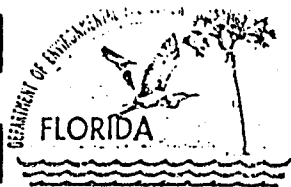
This registration will expire June 30, 1996.

This certificate documents receipt of your annual registration, annual report, training, and demonstration of adequate financial responsibility/insurance coverage as required by Rules 62-710.500, 62-710.520 and 62-710.600, F.A.C. All certified transporters shall comply with the provisions of 62-710.600(4) and (5), F.A.C. This certificate and your cancelled check are your receipts. It shall be displayed in a prominent place at your facility.

Joan M. Flint
Joan M. Flint

Administrative Assistant
Hazardous Waste Management Section

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



Department of Environmental Protection

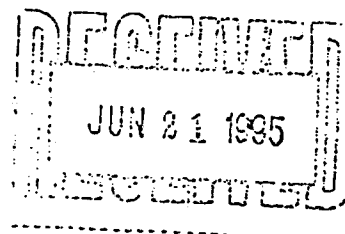
Lawton Chiles
Governor

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2600 Blair Stone Road
Tallahassee, Florida 32399-2400

Virginia B. Wetherell
Secretary

Mr. Tim Hagan
Howco Environmental Services
843 43rd St S
St. Petersburg FL 33711

June 14, 1995



BE IT KNOWN THAT

Howco Environmental Services

IS HEREBY REGISTERED AS A USED OIL

Transporter, Transfer Facility, Processor, Marketer,
Filter Transporter, and Filter Transfer Facility

in compliance with Chapter 62-710, Florida Administrative Code (F.A.C.)

The Department of Environmental Protection hereby issues

Registration Number FLD154762767 on June 14, 1995

This registration will expire June 30, 1996..

This certificate documents receipt of your annual registration, annual report, training, and demonstration of adequate financial responsibility/insurance coverage as required by Rules 62-710.500, 62-710.520 and 62-710.600, F.A.C. All certified transporters shall comply with the provisions of 62-710.600(4) and (5), F.A.C. This certificate and your cancelled check are your receipts. It shall be displayed in a prominent place at your facility.

Joan M. Flint
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Administrative Assistant
Hazardous Waste Management Section

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

INDUSTRIAL WASTEWATER DISCHARGE PERMIT

Permit No. SPFL-5093-86-32

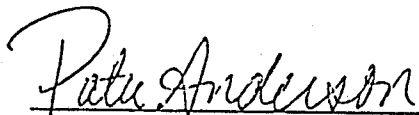
In accordance with the provisions of Chapter 27, Article V, Sewers and Sewage Disposal, Division 3, Section 27.206-235 of the City of St. Petersburg's ordinance, Howco Environmental Services, Ltd., located at 843 43rd Street South, St. Petersburg, Fl 33711 is hereby authorized to discharge a total of 28,800 gallons of treated industrial process wastewater per day from the above identified facility only through the outfall identified herein into the City of St. Petersburg's sewer system in accordance with the effluent limitations, monitoring requirements, and other conditions set forth in Section 1 (specific) and Section 2 (general) attached hereto and incorporated by reference herein as part of this industrial wastewater discharge permit (IWDP).

Compliance with this IWDP does not relieve the permittee of its obligation to comply with all pretreatment regulations, standards or requirements under local, State and Federal laws, including any such laws, regulations, standards, or requirements that may become effective during the term of this IWDP.

Noncompliance with the terms and conditions of this IWDP shall constitute a violation of the St. Petersburg sewer use ordinance.

This IWDP shall become effective on June 24, 1993 and shall expire at midnight on June 23, 1996.

The permittee shall not discharge after the date of expiration. If the permittee wishes to continue to discharge after this expiration date an application must be filed for reissue of this IWDP in accordance with the requirements of Section 27-213 (m) of the St. Petersburg sewer use ordinance, a minimum of 90 days prior to the expiration date.

 , P.E.

Patti Anderson
Assistant Director
Public Utilities Department

ACORD

CERTIFICATE OF INSURANCE

CKR

00859

ISSUE DATE (MM/DD/YY)

07/19/95

PRODUCER

S.I.A.I. INC./SUNCOAST
P. O. BOX 22668
TAMPA FL 33622-2668

INSURED

HAGAN HOLDING COMPANY
DBA HOWCO ENVIRONMENTAL
SERVICES
843 43RD STREET SOUTH
ST. PETERSBURG, FL 33711-1922

THIS CERTIFICATE IS ISSUED AS A MATTER OF INFORMATION ONLY AND
CONFERS NO RIGHTS UPON THE CERTIFICATE HOLDER. THIS CERTIFICATE
DOES NOT AMEND, EXTEND OR ALTER THE COVERAGE AFFORDED BY THE
POLICIES BELOW.

COMPANIES AFFORDING COVERAGE

COMPANY LETTER	A	INS. CO OF NORTH AMERICAN & PRIS
COMPANY LETTER	B	FCCI/SELF INSURERS FUND
COMPANY LETTER	C	
COMPANY LETTER	D	
COMPANY LETTER	E	

COVERAGES

THIS IS TO CERTIFY THAT THE POLICIES OF INSURANCE LISTED BELOW HAVE BEEN ISSUED TO THE INSURED NAMED ABOVE FOR THE POLICY PERIOD INDICATED, NOTWITHSTANDING ANY REQUIREMENT, TERM OR CONDITION OF ANY CONTRACT OR OTHER DOCUMENT WITH RESPECT TO WHICH THIS CERTIFICATE MAY BE ISSUED OR MAY PERTAIN, THE INSURANCE AFFORDED BY THE POLICIES DESCRIBED HEREIN IS SUBJECT TO ALL THE TERMS, EXCLUSIONS AND CONDITIONS OF SUCH POLICIES. LIMITS SHOWN MAY HAVE BEEN REDUCED BY PAID CLAIMS.

CO TR	TYPE OF INSURANCE	POLICY NUMBER	POLICY EFFECTIVE DATE (MM/DD/YY)	POLICY EXPIRATION DATE (MM/DD/YY)	LIMITS
A	GENERAL LIABILITY <input checked="" type="checkbox"/> COMMERCIAL GENERAL LIABILITY <input type="checkbox"/> CLAIMS MADE <input checked="" type="checkbox"/> OCCUR <input type="checkbox"/> OWNER'S & CONTRACTOR'S PROT. EMPLOYEE BENEFIT	MFCD27024464	07/02/95	07/02/96	GENERAL AGGREGATE \$ 2,000,000 PRODUCTS-COMP/OP AGG \$ 1,000,000 PERSONAL & ADV. INJURY \$ 1,000,000 EACH OCCURRENCE \$ 1,000,000 FIRE DAMAGE (Any one fire) \$ 50,000 MED. EXP. (Any one person) \$ 5,000
A	AUTOMOBILE LIABILITY <input checked="" type="checkbox"/> ANY AUTO <input type="checkbox"/> ALL OWNED AUTOS <input type="checkbox"/> SCHEDULED AUTOS <input checked="" type="checkbox"/> HIRED AUTOS <input checked="" type="checkbox"/> NON-OWNED AUTOS <input type="checkbox"/> GARAGE LIABILITY	HO2177924	07/02/95	07/02/96	COMBINED SINGLE LIMIT \$ 1,000,000 BODILY INJURY (Per person) \$ BODILY INJURY (Per accident) \$ PROPERTY DAMAGE \$
	EXCESS LIABILITY <input type="checkbox"/> UMBRELLA FORM <input type="checkbox"/> OTHER THAN UMBRELLA FORM				EACH OCCURRENCE \$ AGGREGATE \$
B	WORKER'S COMPENSATION AND EMPLOYERS' LIABILITY	12495	01/01/95	12/31/95	STATUTORY LIMITS EACH ACCIDENT \$ 500,000 DISEASE-POLICY LIMIT \$ 500,000 DISEASE-EACH EMPLOYEE \$ 500,000
A	OTHER PROPERTY SPECIAL FORM	MFCD27024464	07/02/95	07/02/96	AS PER POLICY

DESCRIPTION OF OPERATIONS/LOCATIONS/VEHICLES/SPECIAL ITEMS

95/96 PKG, AUTO & WC NAMED INSURED INCLUDES HOWCO ENVIRONMENTAL SERVICES
FORMERLY KNOWN AS TIM'S OIL RECOVERY & TIMCO REALTY & ARTHUR T. HAGAN,
INDIVIDUAL AUTO LIAB INCLUDES SUDDEN & ACCIDENTIAL POLLUTION FORM MCS90

CERTIFICATE HOLDER

FOR INFORMATION PURPOSES

CANCELLATION

SHOULD ANY OF THE ABOVE DESCRIBED POLICIES BE CANCELLED BEFORE THE
EXPIRATION DATE THEREOF, THE ISSUING COMPANY WILL ENDEAVOR TO
MAIL 10 DAYS WRITTEN NOTICE TO THE CERTIFICATE HOLDER NAMED TO THE
LEFT, BUT FAILURE TO MAIL SUCH NOTICE SHALL IMPOSE NO OBLIGATION OR
LIABILITY OF ANY KIND UPON THE COMPANY, ITS AGENTS OR REPRESENTATIVES.

AUTHORIZED REPRESENTATIVE