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Permit Correspondence Page 1 Vol 1 (1-b)

[illegible]



# Pinellas County Public Health Unit

October 21, 1996

Tim Hagan  
HOWCO Environmental Services, Inc.  
843 43rd Street South  
St. Petersburg, FL 33711-1922

Re: 528624557  
HOWCO Environmental Services Inc.  
St. Petersburg  
PINELLAS

RECEIVED  
OCT 22 1996

Department of Environmental Protection  
SOUTHWEST DISTRICT  
BY \_\_\_\_\_

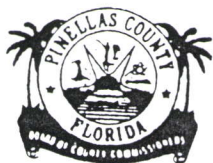
Dear Mr. Hagan:

On October 16-17, 1996 a reinspection was performed at the referenced facility, to determine the level of compliance with issues initially addressed in this agency's June 11, 1996 non-compliance letter. The present inspection was a multi-agency effort, with the following representatives: Roy Williams, City of St. Petersburg Fire Department; Jose Rodriguez-Lugo, Pinellas County Environmental Management; and the DEP Hazardous Waste Program, with Roger Evans, Randy Strauss, and William Crawford. A copy of my report is enclosed for your file.

It is acknowledged that you have provided this agency with a current site plan, sealed by your engineer as of September 13, 1996. As we have previously discussed you need to provide this agency with a written statement regarding your efforts to meet the compliance issues addressed in the June 1996 letter. During the recent visit, you made available a draft version of your reply; please forward that document to this agency.

With respect to the present reinspection, the following issues require your attention and a timely response:

- No release detection records exist for the underground piping connecting the East and West tank farms. You indicated that you will be having a Pollutant Contractor perform line tightness testing within the 30 days of October 17, 1996. Please forward the test results upon completion of the test.
- Initiate repair to the roof of tank #142, which has visible holes. It is recommended that a non-destructive evaluation of the tank integrity be performed in conjunction with the repair. This repair issue was initially noted on the May 15, 1996 compliance inspection.
- On the May 15, 1996 inspection it was noted that the western concrete saddle of tank #130 was damaged. Since that time, it has become apparent that this tank is part of the flow-through process area. Therefore, it becomes a recommendation that this structural defect be repaired.



PINELLAS COUNTY PUBLIC HEALTH UNIT  
ENGINEERING - SUITE 300  
4176 EAST BAY DRIVE  
CLEARWATER, FLORIDA 34624-6966

TEL: (813) 538-7277 FAX: (813) 538-7293 SUNCOM: 558-7277

LAWTON CHILES, GOVERNOR



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HOWCO

Page 2

- The May 15, 1996 inspection and subsequent letter addressed structural defects associated with the walls and floors of the western and eastern containment units. Please advise this agency as to the steps you have taken to repair these areas, and to provide an impervious structure.
- Provide a copy of the Storage Tank Registration Form (STRF) documenting your notification of DEP Tallahassee of the closed status of tank #120.

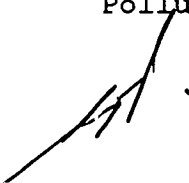
Upon completion of the repairs to Tank #142 a reinspection will be performed by this agency.

If I may be of further assistance, please contact me at (813) 538-7277 extension 136.

Sincerely,



Ernest M. Roggelin  
Environmental Specialist III  
Pollutant Storage Tank Program



POLLUTANT STORAGE TANK SYSTEM  
INSPECTION REPORT FORM - COVER PAGE

PAGE: 1 OF 3  
PRINTED: 10/14/96

FACILITY ID #: 528624557

COUNTY: PINELLAS

FACILITY NAME: HOWCO ENVIRONMENTAL SERVICES, INC

FACILITY LOCATION: 843 43RD ST S, SAINT PETERSBURG

FACILITY CONTACT: TIM HAGAN

PHONE: (813) 327-8467

OWNER: HOWCO ENVIRONMENTAL SERVICES INC

PHONE: (813) 327-8467

OWNER ADDRESS: 843 43RD ST S, SAINT PETERSBURG, FL, 33711-1922

OWNER CONTACT: TIM HAGAN

OWNER CHANGE DATE: 06/16/93

LATITUDE: 27-45-47 LONGITUDE: 82-41-32

FAC TYPE: NON-RETAIL BUSINESS

LAST UST COMPLIANCE DATE: 00/00/00

LAST AST COMPLIANCE DATE: 11/02/94

CONTAMINATION DATA AVAILABLE: OTHER ATRP

TANK #	SIZE	CONTENT	INSTALL DATE	UNDER OR ABOVE	TANK TYPE	INTEGRAL PIPING	MONITORING SYSTEM	TANK STAT
1	2000	A	XX/XX	A	D	C	I	B
100	29500	L	XX/80	A	ACK	BI	M	U
101	28500	L	XX/80	A	ACK	BI	M	U
105	14000	L	XX/80	A	CKM	BI	M	U
106	9870	L	XX/80	A	CKM	BI	M	U
120	21775	L	XX/80	A	ACK	BI	M	U
121	27989	L	XX/80	A	ACK	BI	M	U
122	27989	L	XX/80	A	ACK	BI	M	U
123	27989	L	XX/80	A	ACK	BI	M	U
124	27989	L	XX/80	A	ACK	BI	M	U
125	18040	L	XX/80	A	ACK	BI	M	U
126	18565	L	XX/80	A	ACK	BI	M	U
127	18565	L	XX/80	A	ACK	BI	M	U
128	23792	L	XX/80	A	ACK	BI	M	U
129	21775	L	XX/80	A	ACK	BI	M	U
140	26041	L	XX/80	A	ACK	CKM	M	U
141	17432	L	XX/80	A	ACK	CKM	M	U
142	17432	L	XX/80	A	ACK	CKM	M	U
143	17013	L	XX/80	A	ACK	CKM	M	U
144	18886	L	XX/80	A	ACK	CKM	M	U
150	15000	L	XX/80	A	ACK	CKM	M	U
151	15000	L	XX/80	A	ACK	CKM	M	U
152	28130	L	XX/80	A	ACK	CKM	M	U
153	20531	L	XX/80	A	ACK	CKM	M	U
154	18172	L	XX/80	A	ACK	CKM	M	U
155	20139	L	XX/80	A	ACK	CKM	M	U
160	14792	L	XX/80	A	ACK	CKM	M	U

MORE TANKS LISTED NEXT PAGE

INSPECTION TYPE (ALL THAT APPLY)

☐ ROUTINE  
☐ INSTALL  
☐ ABANDONED  
☐ DISCHARGE  
☐ CLOSURE  
☒ REINSPECT

SITE INFORMATION (ALL THAT APPLY)

☐ NEAR PUB WELL  
☒ CONTAMINATED  
☐ COMPLAINT  
☐ ACID TANKS  
☐ REPAIRED  
☐ UPGRADED  
☐ UST & AST  
☐ HAZARD MAT

DEP DISTRICT OR LOCAL PROGRAM:

PINELLAS CPU-ENGINEERING

INSPECTOR NAME (PRINT) EM ROGGELOW

CONTACT NAME (PRINT) Tim Hagan

INSPECTOR'S SIGNATURE & DATE

10-17-96

CONTACT'S SIGNATURE & DATE

10-17-96



TANK #	SIZE	CONTENT	INSTALL DATE	UNDER OR ABOVE	TANK TYPE	INTEGRAL PIPING	MONITORING SYSTEM	TANK STAT
161	14792	L	XX/80	A	CKM	BI	M	U
162	14792	L	XX/80	A	CKM	BI	M	U
163	14792	L	XX/80	A	ACK	CKM	M	U
164	18832	L	XX/80	A	ACK	CKM	M	U
165	18618	L	XX/80	A	ACK	CKM	M	U
166	15000	L	XX/80	A	ACK	CKM	M	U
170	11000	L	XX/80	A	ACK	ACK	M	U
171	9607	L	XX/80	A	ACK	ACK	M	U
172	9703	L	XX/80	A	ACK	ACK	M	U
173	5500	L	XX/80	A	ACK	ACK	M	U
174	2898	L	XX/80	A	ACK	ACK	M	U
180	56796	L	XX/80	A	ACK	CKM	M	U
2	4000	D	XX/XX	A	D	C	I	B
3	3000	D	XX/87	A	AEK	D	BC	U

MULTI-AGENCY INSPECTION:

JOSE RODRIGUEZ-LUGO (PINELLAS COUNTY ENV. MGMT.)  
 ROGER EVANS  
 RANDY STRAUSS } DEP SOUTHWEST  
 WILLIAM C. CRAWFORD } HAZARDOUS WASTE PROGRAM  
 ROY WILLIAMS CITY ST. PETERSBURG FIRE DEPT

FACILITY ID #: 528624557  
FACILITY NAME: HOWCO ENVIRONMENTAL SERVICES, INC  
FACILITY LOCATION: 843 43RD ST S, SAINT PETERSBURG  
FACILITY CONTACT: TIM HAGAN

COUNTY: PINELLAS

PHONE: (813) 327-8467

COMMENTS: (A) REVIEWED HOWCO'S DRAFT RESPONSE LETTER TO  
MAY 15, 1996 LETTER. (B) RCND SITE PLAN.

ITEM #11: NO RELEASE DETECTION RECORDS FOR UNDERGROUND  
PIPE CONNECTING WEST & EAST FARMS SINCE MAY 1996

ITEM #23: FORMER USTs NOW SERVING AS ASTs  
MUST MEET 62-762 FAC REFERENCED STANDARDS BY  
DECEMBER 1999.

ITEM #28: REPAIR #142 TANK WITH VISIBLE  
HOLES IN TANK ROOF. PROVIDE NON-DESTRUCTIVE  
EVALUATION OF TANK INTEGRITY. (NOTE: TANK #130  
SADDLE DAMAGED)

ITEM #32: REFER TO MAY 15, 1996 INSPECTION  
REGARDING COMMENTS ON CONDITION OF  
CONTAINMENT WALLS & FLOORS; CONTINUE REPAIR  
PROCESS.

ITEM #35: FACILITY HAS CHOSEN PRESSURE-TEST  
OF BULK PIPING (UNDERGROUND); TO BE  
PERFORMED WITHIN 30 DAYS AS INDICATED VERBALLY  
• VISUAL CHECKLIST OF TANKS & CONTAINMENT.

• SEND COPY of STRF for Tank #120 (ITEM #1)

• VISUAL INSPECTION DOCUMENTATION ADEQUATE SINCE MAY 1996  
• PHOTOS TAKEN OF FACILITY.  
• ADDITIONAL CORRESPONDENCE CONCERNING TANK #120  
CLOSURE, WILL BE FORTHCOMING FROM AGENCY.



Name: ARVCO  
Facility I.D.#: 528624557  
Date: 10-16-97

ABOVEGROUND STORAGE TANK  
COMPLIANCE INSPECTION FORM

Yes No Unk N/A

I. REGISTRATION/NOTIFICATION: Comments: _____	
1. Facility has registered all applicable tanks on site; 62-762.400	1. <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> Unk <input type="checkbox"/> N/A
2. Current registration placard is properly displayed; 62-762.410 (6) <u>1996-1997</u>	2. <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> Unk <input type="checkbox"/> N/A
Proper notification has been made for the following; 62-762.450:	
3. Abandonment and closure (30 days prior); (1) (a)	3. <input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> Unk <input checked="" type="checkbox"/> N/A
4. Change of ownership (30 days after); (1) (b)	4. <input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> Unk <input checked="" type="checkbox"/> N/A
5. Retrofitting, replacement or upgrading; (10 days prior); (1) (c)	5. <input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> Unk <input checked="" type="checkbox"/> N/A
6. Change of tank status (in service/out of service); (1) (d)	6. <input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> Unk <input checked="" type="checkbox"/> N/A
7. Change of facility status (e.g. substances stored); (1) (e)	7. <input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> Unk <input checked="" type="checkbox"/> N/A
8. Change of method of financial responsibility (within 30 days); (2)	8. <input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> Unk <input checked="" type="checkbox"/> N/A
9. The facility owner/operator notified D.E.R. of internal tank inspection 24 hrs prior to the test; (3)	9. <input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> Unk <input checked="" type="checkbox"/> N/A
10. Loss of greater than 100 gallons on an impervious surface or 500 gallons inside secondary containment within one working day; .450 (4)	10. <input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> Unk <input checked="" type="checkbox"/> N/A

II. RECORDS KEEPING: Comments: _____	
11. All records were maintained for two (2) years and were available for inspection within five (5) working days; 62-762.710	11. <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> Unk <input type="checkbox"/> N/A
12. Some, but not all records were maintained for two (2) years and were available for inspection within five (5) working days; 62-762.710	12. <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> Unk <input type="checkbox"/> N/A

III. REPORTING/DISCHARGE RESPONSE/ REPAIRS: Comments: _____	
Proper reporting requirements met for the following; 62-762.460:	
13. Integral piping tightness test failure within 10 days; (1)	13. <input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> Unk <input checked="" type="checkbox"/> N/A
14. Pollutant discharge exceeding 25 gallons on a pervious surface; (2)	14. <input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> Unk <input checked="" type="checkbox"/> N/A
15. Positive response of a release detection device within one working day; (3)	15. <input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> Unk <input checked="" type="checkbox"/> N/A
The owner or the operator of the system which has discharged has:	
16. Taken it out-of-service; 62-762.700 (1), had it repaired or replaced; .700, or properly closed it; .800	16. <input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> Unk <input checked="" type="checkbox"/> N/A
17. Removed any regulated substances from the system; 62-762.820 (1)	17. <input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> Unk <input checked="" type="checkbox"/> N/A
18. Tightness tested all repaired components before placing them back in service; 62-762.700 (5) & (6)	18. <input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> Unk <input checked="" type="checkbox"/> N/A
19. Begun initial corrective actions for a release; 62-762.820 (2)	19. <input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> Unk <input checked="" type="checkbox"/> N/A

IV. INVENTORY REQUIREMENTS FOR TANKS IN CONTACT WITH THE SOIL: Comments: <u>OTHER POLLUTANTS</u>	
20. All inventory requirements maintained in accordance with 62-762.720 (1)	20. <input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> Unk <input checked="" type="checkbox"/> N/A
21. Some, but not all inventory requirements maintained in accordance with 62-762.720 (1)	21. <input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> Unk <input checked="" type="checkbox"/> N/A



Name: HALL  
Facility I.D.#: 52864557  
Date: 10-16-96

ABOVEGROUND STORAGE TANK  
COMPLIANCE INSPECTION FORM

Yes No Unk N/A

V. PERFORMANCE STANDARDS/CATHODIC PROTECTION: Comments: _____	
Storage tank criteria; 62-762.500	
22. Meets construction upgrading schedule; 510 and 520 <u>1999</u>	22.
23. Meets applicable storage tank standards; (1), (2) & (3) <u>USTs (former) as ASTs.</u>	23.
24. Tank has secondary containment system; 500 (6) <u>condition</u>	24.
25. Tank equipped with overfill protection; (3) (f) 1-4, (g)	25.
Piping criteria	
26. Meets new piping standards with secondary containment; 500 (4) & 600 (4)	26.
27. Meets construction upgrading schedule; 62-762.510 (3), & 520 (2)	27.
Repairs to storage tank systems; 62-762.700	
28. Failed storage tank system component properly repaired; (1)-(4) <u>Leak # 142</u>	28.
29. Tightness testing of the required component prior to being brought back into service; (5)	29.
Cathodic Protection; 62-762.730	
30. Cathodic protection system for tank and piping provides continuous protection; (1)-(4)	30.
Secondary containment; 62-762.500	
31. Does containment area have sufficient volume; 500 (6) (a) (2)	31.
32. Is the containment area made out of impervious material in accordance with Chapter 62-762, F.A.C., requirements; (6) (a) (1) <u>hollow block, cracking walls/floor.</u>	32.
33. Is the containment area equipped with drainage system or protected from accumulation of rain; (6) (a) (3)	33.
34. Hydrant pits equipped with spill prevention equipment; (5)	34.

VI. RELEASE DETECTION/MONITOR WELLS: Comments: <u>underground line</u>	
35. Facility has an approved release detection system; 62-762.600 & 62-762.860	35.
36. Monitoring wells properly designed, constructed and installed; 62-762.640 or 62-762.600 (6)	36.
37. Interstitial monitoring adequate to detect a release from integral piping; 62-762.600 (4) & (5)	37.

VII. OUT-OF SERVICE STATUS: Comments: _____	
38. Are the corrosion protection devices properly maintained; 62-762.860 (b) (a)	38.
39. Is the vent line and other ancillary equipment properly secured and maintained; (1) (b)	39.
40. Test performed to insure the integrity of out-of-service system prior to being returned to service; (1) (c)	40.

VIII. VARIANCE: Comments: _____	
41. Has the facility for an Alternate Procedure; 62-762.850 (1)	41.

IX. OTHERS: Comments: _____	
42. Any other violation noted during inspection (Explain in comments)	42.



04/12/96  
tankstat.frx

FILE

# HOWCO ENVIRONMENTAL SERVICES TANK DATA SHEET

Page 1

No.	Description	Style	Diameter/ Width	Length	Height	Adj(in.)	Capacity	Gals/in.
100	Oil Plant	Horizontal	12ft. 0in.	35ft. 10in.		12.00	30,314	N/A
101	Oil Plant	Horizontal	12ft. 0in.	34ft. 1in.		3.50	28,833	N/A
105	Water Plant	Vertical	10ft. 5in.	24ft. 2in.		50.00	15,405	53.12
106	Water Plant	Vertical	7ft. 11in.	26ft. 11in.		13.00	9,911	30.68
120	Oil Plant	Vertical	10ft. 6in.	36ft. 3in.		46.50	23,479	53.97
121	Oil Plant	Vertical	12ft. 0in.	35ft. 2in.		6.50	29,750	70.50
122	Oil Plant	Vertical	12ft. 0in.	35ft. 2in.		6.50	29,750	70.50
123	Oil Plant	Vertical	12ft. 0in.	35ft. 2in.		6.50	29,750	70.50
124	Oil Plant	Vertical	12ft. 0in.	35ft. 2in.		6.50	29,750	70.50
125	Oil Plant	Vertical	9ft. 6in.	36ft. 3in.		44.50	19,220	44.18
126	Oil Plant	Vertical	10ft. 8in.	31ft. 2in.		42.00	20,832	55.70
127	Oil Plant	Vertical	10ft. 6in.	30ft. 1in.		42.50	19,485	53.98
128	Oil Plant	Vertical	12ft. 6in.	28ft. 1in.		43.00	25,779	76.50
129	Oil Plant	Vertical	10ft. 6in.	36ft. 3in.		46.50	23,479	53.97
130	Oil Plant	Horizontal	8ft. 0in.	21ft. 2in.		3.00	7,958	N/A
131	Oil Plant	Horizontal	5ft. 4in.	23ft. 9in.		2.50	3,969	N/A
132	Oil Plant	Horizontal	5ft. 4in.	23ft. 9in.		2.00	3,969	N/A
133	Oil Plant	Horizontal	5ft. 4in.	23ft. 9in.		3.00	3,969	N/A
134	Oil Plant	Horizontal	5ft. 4in.	23ft. 9in.		6.00	3,969	N/A
135	Oil Plant	Horizontal	8ft. 0in.	16ft. 0in.		0.00	6,216	N/A
136	Oil Plant	Horizontal	10ft. 0in.	17ft. 1in.		1.50	10,036	N/A
137	Oil Plant	Horizontal	10ft. 0in.	18ft. 0in.		6.00	10,575	N/A
140	Water Plant	Vertical	19ft. 11in.	13ft. 0in.		51.00	30,295	104.20
141	Water Plant	Vertical	12ft. 11in.	19ft. 11in.		53.00	19,521	81.68
142	Water Plant	Vertical	12ft. 11in.	19ft. 11in.		56.50	19,521	81.68
143	Water Plant	Vertical	10ft. 2in.	29ft. 5in.		49.00	17,862	50.60
144	Water Plant	Vertical	10ft. 5in.	31ft. 2in.		48.00	19,867	53.12
150	Water Plant	Vertical	10ft. 5in.	31ft. 2in.		15.00	19,867	53.12
151	Water Plant	Vertical	10ft. 5in.	31ft. 2in.		17.00	19,867	53.12
152	Water Plant	Vertical	12ft. 0in.	35ft. 1in.		13.00	29,679	70.50
153	Water Plant	Vertical	10ft. 0in.	35ft. 11in.		6.00	21,100	48.96
154	Water Plant	Vertical	9ft. 6in.	36ft. 2in.		48.00	19,176	44.18
155	Water Plant	Vertical	10ft. 0in.	35ft. 11in.		46.00	21,100	48.96
160	Water Plant	Vertical	10ft. 5in.	23ft. 8in.		64.50	15,086	53.12
161	Water Plant	Vertical	10ft. 5in.	23ft. 8in.		64.50	15,086	53.12
162	Water Plant	Vertical	10ft. 6in.	23ft. 8in.		64.50	15,329	53.98
163	Water Plant	Vertical	10ft. 6in.	23ft. 8in.		64.50	15,329	53.98
164	Water Plant	Vertical	10ft. 6in.	30ft. 11in.		50.00	20,025	53.98

No.	Description	Style	Diameter/ Width	Length	Height	Adj(in.)	Capacity	Gals/In.
165	Water Plant	Vertical	10ft. 0in.	30ft. 8in.		60.00	18,016	48.96
166	Water Discharge	Vertical	10ft. 10in.	31ft. 1in.		8.00	21,431	57.46
170	Oil Plant	Vertical	10ft. 5in.	17ft. 6in.		2.00	11,155	53.12
171	Oil Plant	Vertical	9ft. 0in.	22ft. 8in.		40.00	10,786	39.65
172	Oil Plant	Vertical	8ft. 0in.	27ft. 0in.		1.50	10,152	31.33
173	Oil Plant	Vertical	8ft. 6in.	14ft. 0in.		4.00	5,942	35.37
174	Oil Plant	Vertical	6ft. 6in.	12ft. 0in.		0.00	2,979	20.69
180	Water Plant	Vertical	20ft. 11in.	23ft. 9in.		79.50	61,044	214.19
181	Ft Myers # 1	Vertical	10ft. 6in.	31ft. 9in.		57.00	20,564	53.97
182	Ft Myers # 2	Vertical	10ft. 0in.	32ft. 1in.		20.00	18,848	48.96
183	Ft Myers # 3	Vertical	10ft. 6in.	32ft. 9in.		23.00	21,212	53.97
184	Ft Myers # 4	Vertical	10ft. 6in.	31ft. 7in.		56.00	20,456	53.97
185	YBOR #1	Vertical	12ft. 0in.	35ft. 2in.		6.50	29,750	70.50
186	YBOR #2	Vertical	12ft. 0in.	35ft. 2in.		6.50	29,750	70.50
187	YBOR #3	Vertical	12ft. 0in.	35ft. 2in.		6.50	29,750	70.50
191	Batch Tank TK-A	Vertical	10ft. 0in.	17ft. 5in.		8.00	10,232	48.96
192	Batch Tank TK-B	Vertical	12ft. 0in.	12ft. 2in.		9.00	10,293	70.50
193	Rolloff 1	Rectangular	6ft. 8in.	21ft. 7in.	5ft. 7in.	0.00	6,009	89.69
194	Rolloff 2	Rectangular	7ft. 0in.	19ft. 6in.	3ft. 11in.	0.00	3,999	85.09
195	SLUDGE CONE	Vertical	0ft. 1in.	0ft. 1in.		0.00	0	0.00
196	BARGE - TAMPA	Rectangular	0ft. 1in.	0ft. 1in.	0ft. 1in.	0.00	0	0.00
197	FT. MYERS - TR TO TRL	Horizontal	0ft. 1in.	0ft. 1in.		0.00	0	N/A

Number of Tanks: 60

Total Capacity: 1,047,276



# Department of Environmental Protection

Lawton Chiles  
Governor

Southwest District  
3804 Coconut Palm Drive  
Tampa, Florida 33619

Virginia B. Wetherell  
Secretary

## LETTER ACKNOWLEDGING ACCEPTABILITY OF USE OF GENERAL PERMIT

<sup>25</sup>  
July 18, 1996

Mr. Tim Hagan, President  
Howco Environmental Services Ltd.  
843 43rd Street South  
St. Petersburg, Florida 33711

RE: Notification of Use of General Permit  
Used Oil Recycling Facility      General Permit No.: SO52-279950  
Pinellas County

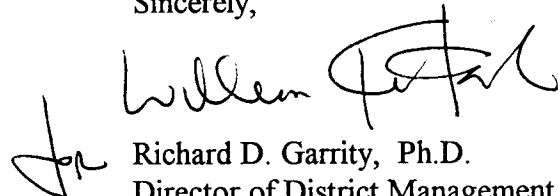
Dear Mr. Hagan:

This letter acknowledges receipt of your notice of intent to use a general permit for the subject project and does not object to your use of such general permit. This general permit authorization **expires on July 18, 2001**.

Please be advised that you are required to abide by all conditions in Rules 62-4.510 through 62-4.540, Florida Administrative Code (FAC), the general requirements for general permits; and Rule 62-710 FAC.

Please be advised that the operation or activities 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.  
Director of District Management  
Southwest District

RDG/re

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

STATE OF FLORIDA  
DEPARTMENT OF ENVIRONMENTAL PROTECTION

Howco/00 Permt  
RECEIVED  
JUL 19 1996  
DEPARTMENT OF  
ENVIRONMENTAL PROTECTION  
OFFICE OF GENERAL COUNSEL

HOWCO ENVIRONMENTAL SERVICES,

Petitioner,

vs.

OGC CASE NO.: 95-2852

STATE OF FLORIDA DEPARTMENT  
OF ENVIRONMENTAL PROTECTION,

Respondent.

**REQUEST FOR EXTENSION OF TIME  
TO FILE PETITION OF HEARING**

Pursuant to Florida Administrative Code Rule 62-103.070, Petitioner, Howco Environmental Services requests that the Department extend the time to file a petition for formal administrative hearing regarding a Notice of Denial of General Permit/Used Oil Recycling Facility, FLD 152-764-767, Application S052-279950 (the "Application"). In support of said motion, Petitioner states as follows:

1. Representatives of Petitioner and Department have met and Petitioner has submitted additional materials in support of its Application as requested by the Department. We understand that all outstanding issues have been resolved to the satisfaction of the Department and Petitioner, however, Petitioner has not yet received the permit from the Department or had an opportunity to review the language of same.
2. The Department's Order Granting Request for Extension of Time to File Petition for Hearing expires July 20, 1996.
3. Based on the foregoing, Petitioner requests an extension of time to file a Petition for Administrative Hearing on the Department's Notice of

PERMIT COVER MEMO

TO: RICK GARRITY, DIRECTOR OF DISTRICT MANAGEMENT

FROM/THROUGH:

William Kutash, PROGRAM ADMINISTRATOR  
William Crawford, DISTRICT PERMITTING ENGINEER *WCC*

DATE: July 18, 1996

FILE NAME: Howco Environmental Services PERMIT #:SO52-279950  
PROGRAM : Solid Waste COUNTY Pinellas

TYPE OF PERMIT ACTION: X PERMIT MODIFICATION MINOR

PUBLIC NOTICE PERIOD CLOSED? N/A

PERMIT SUMMARY: The facility conducts used oil and industrial waste water treatment operations at a facility located at 843 43rd Street South, St. Petersburg.

PROFESSIONAL RECOMMENDATION: X APPROVE        DENY

EVALUATION SUMMARY: The facility submitted a timely notice of intent to use the general permit for used oil processing facilities on November 2, 1995. The information submitted with the notice was reviewed and a notice of intent to deny the use of the general permit was sent to the facility on November 20, 1995. The facility requested several petitions of time to submit additional information, and the additional information was received on June 22, 1996. The revised package was reviewed and is acceptable with some language changes agreed to by the applicant.





Virginia B. Wetherell  
Secretary

A T T E N D E E S

STATE OF FLORIDA  
DEPARTMENT OF ENVIRONMENTAL PROTECTION

D.E.P.

APR 22 1996

SOUTHWEST DISTRICT  
TAMPA

HOWCO ENVIRONMENTAL SERVICES,

Petitioner,

vs.

OGC CASE NO.: 95-2852

STATE OF FLORIDA DEPARTMENT  
OF ENVIRONMENTAL PROTECTION,

Respondent.

**THIRD REQUEST FOR EXTENSION OF TIME  
TO FILE PETITION OF HEARING**

Pursuant to Florida Administrative Code Rule 62-103.070, Petitioner, Howco Environmental Services requests that the Department extend the time to file a petition for formal administrative hearing regarding a Notice of Denial of General Permit/Used Oil Recycling Facility, FLD 152-764-767, Application S052-279950 (the "Application"). In support of said motion, Petitioner states as follows:

1. Representatives of Respondent and Department staff have met to discuss additional materials Respondent must submit in response to the Department's objections to the Application and Respondent is preparing those materials for submission. Staff member, William Crawford, has been contacted and does not object to the extension of time.
2. Based on the foregoing, Petitioner requests an extension of time to file a Petition for Administrative Hearing on the Department's Notice of General Permit Denial/Used Oil Recycling Facility for an additional ninety (90) days until July 20, 1996.



# Department of Environmental Protection

Lawton Chiles  
Governor

Southwest District  
3804 Coconut Palm Drive  
Tampa, Florida 33619

Virginia B. Wetherell  
Secretary

**PERMITTEE:**

HOWCO Environmental Services  
843 Forty Third Street South  
St. Petersburg, FL 33711

**Issue Date:** JUN 20 1996

**Permit No.:** 1030153-002-AO

**County:** Pinellas

**Expiration Date:** 06/24/2001

**Project:** Oil Recycling Operation

This permit is issued under the provisions of Chapter 403, Florida Statutes, and Florida Administrative Code Chapters 62-204, 62-210, 62-212, 62-213, 62-296, 62-297, and Chapter 62-4. The above named permittee is hereby authorized to perform the work or operate the facility shown on the application and approved drawing(s), plans and other documents, attached hereto or on file with the Florida Department of Environmental Protection:

For the operation of one (1) oil heater, two (2) heated oil tanks, a condensing unit, and a flash tower at an oil recycling operation. Waste oil is heated in the tanks to 190 degrees F to expedite separation of water from oil. The tanks are "cooked" for approx. one week. During this process negligible amounts of volatile organic compounds (VOC's) are released ( $< 0.0005$  TPY). The oil heater is used to heat the tanks. The oil heater is a Hy-Way Vertical Helical Coil Thermal Fluid Heater, Model MKVO-600. It is used to heat tanks of waste oil to approximately 190 degrees F to expedite separation of water from oil. It is fired on virgin No. 2 fuel oil with a maximum sulfur content of 0.5% or "on-specification" used No. 5 fuel oil at with a maximum sulfur content of 0.75%, at a maximum fuel firing rate of 34.5 gallons/hour (corresponds to 4.8 MMBtu/hour).

The flash tower, which is used to evaporate water from the used oil, is a completely enclosed system, no emissions are released during normal operation. The flash tower is equipped with temperature sensing equipment which will shutdown the entire oil recycling operation if the tower's temperature exceeds its normal operating range. In the event of a failure of the temperature sensing equipment and the tower's temperature exceeds its normal operating range, emissions will be vented to a storage tank then through a charcoal filter prior to venting to the atmosphere. The condensing unit evaporates any gasoline in the used oil and condenses it for reuse. VOC emissions from gasoline storage are vented through a charcoal filter for control. VOC emissions from the condensing unit are negligible ( $< 0.01$  TPY).

PERMITTEE:  
HOWCO Environmental Services

Permit No.: 1030153-002-AO  
Project: Oil Recycling Operation

**Description (continued):**

**Location:** 843 43rd Street South, St. Petersburg

**UTM:** 17-333.2 E 3071.6 N

**Facility ID No.:** 1030153

**Emission Unit ID No.:** 003

**Note:** Please reference Permit No. and Emission unit ID No. in all correspondence, test report submittals, applications, etc.

**Replaces Permit Nos.:** AC52-225533 and AO52-249212

*[Permitting Note: This permit includes the new oil heater (permitted on AC52-266246) which replaced the previously existing Hy-Way Model No. 58 SF oil heater at this facility which was included on operation permit AO52-249212. This new permit replaces that permit.]*

**Specific Conditions:**

1. A part of this permit is the attached 15 General Conditions.  
[Rule 62-4.160, F.A.C.]
2. Issuance of this permit does not relieve the permittee from complying with applicable emission limiting standards or other requirements of Chapters 62-2 through 62-297, or any other requirements under federal, state, or local law.  
[Rule 62-210.300, F.A.C.]

Operation and Emission Limitations

3. This source is permitted for continuous operation (8,760 hrs/yr).  
[Construction permit AC52-266246]
4. This oil heater is permitted to burn only the following fuels:
  - A. virgin No. 2 fuel oil with a maximum sulfur content of 0.5% by weight; and
  - B. "on-specification" (see Specific Condition No. 5) used No. 5 fuel oil with a maximum sulfur content of 0.75% by weight.

[Construction permit AC52-266246]

PERMITTEE:  
HOWCO Environmental Services

Permit No.: 1030153-002-AO  
Project: Oil Recycling Operation

**Specific Conditions:**

5. This source is permitted to burn "on-specification" used No. 5 oil. "On specification" used oil is defined as used oil that meets the 40 CFR Part 279 (Standards for the Management of Used oil) specifications listed below. Used oil that does not meet any of the following specifications is considered "off-specification" oil and shall not be burned.

<u>CONSTITUENT/PROPERTY</u>	<u>ALLOWABLE LEVEL</u>
Arsenic	5 ppm maximum
Cadmium	2 ppm maximum
Chromium	10 ppm maximum
Lead	100 ppm maximum
Total Halogens	4,000 ppm maximum *
Flash Point	100 °F minimum
PCB's	less than 50 ppm

\* The permittee shall have on record certification that the used fuel oil received at the facility having halogen levels between 1000 and 4000 ppm, inclusive, has not been mixed with any hazardous waste (40 CFR 279.10(b)(ii)). The records shall be retained for a minimum of two years and made available upon request.

(See also Specific Condition No. 14 for sample analysis and recordkeeping requirements.)

[Rule 403.769(3)(b), Florida Statutes and 40 CFR 279.10 & 279.11]

6. The fuel oil firing rate for this oil heater shall not exceed 34.5 gallons per hour (corresponds to approximately 4.8 MMBtu/hr).  
[Construction permit AC52-266246]

7. Visible emissions from the oil heater's stack shall not be equal to nor greater than 20% opacity.  
[Rule 62-296.310(2)(a), F.A.C.]

8. The permittee shall not cause, suffer, allow, or permit the discharge of air pollutants which cause or contribute to an objectionable odor.  
[Rule 62-296.320(2), F.A.C. and Pinellas County Ordinance No. 89-70, Subpart 6.620]

Compliance Testing Requirements

9. The oil heater's exhaust stack shall be tested for visible emissions annually on or during the 60 day period prior to the date of March 13 of each year. Copies of the test data shall be submitted to the Air Section of the Southwest District Office of the Department of Environmental Regulation, and the Air Quality

(continued)



PERMITTEE:  
HOWCO Environmental Services

Permit No.: 1030153-002-AO  
Project: Oil Recycling Operation

**Specific Conditions:**

9. (continued)

Division of the Pinellas County Department of Environmental Management within 45 days of the testing. (See Specific Condition Nos. 11, 12, 14 and 15 for additional information to be submitted as part of the test report.)

[Rules 62-297.310(7)(a)4., and 62-297.310(8)(b), F.A.C.]

10. Compliance with the visible emission limitation of Specific Condition No. 7 shall be determined using EPA Method 9 and shall be conducted by a certified observer and be a minimum of thirty (30) minutes in duration. The test observation period shall include the period during which the highest opacity emissions can reasonably be expected to occur. The minimum requirements for stack sampling facilities, source sampling and reporting, shall be in accordance with Rule 62-297, F.A.C. and 40 CFR 60, Appendix A.

[Rules 296.310(2)(c) and 62-297.310(4)(a)2., F.A.C.]

11. The initial compliance tests shall be conducted while the oil heater is firing No. 5 "on-specification" used oil unless used oil is not available at the time of testing. Subsequent annual testing shall be conducted while firing No. 5 "on-specification" used oil unless used oil has been fired in the oil heater for less than 400 hours during the previous 12 month period. In that case the test may be conducted while firing new No. 2 fuel oil. A statement of the type of oil fired during the test, with a fuel oil certification, shall be included with all test reports

[Rules 62-297.310(7)(a)4. and 62-297.310(8), F.A.C.]

12. Testing of emissions shall be conducted during firing of the oil heater at permitted capacity (defined as a fuel firing rate within 90-100% of the maximum permitted fuel firing rate of 34.5 gallons hour (4.8 MMBtu/hour)). If it is impractical to test at permitted capacity, a compliance test may be conducted at a lower rate. Subsequent unit operation is limited to 110% of the tested rate until a new test is conducted. Once the unit is so limited, operation at higher fuel firing rates is allowed for no more than 15 consecutive days for purposes of additional compliance testing. The test results shall be submitted to the Southwest District Office of the Department and the Pinellas County Department of Environmental Management within 45 days of testing. Acceptance of the test by the Department will automatically constitute an amended permit at the higher tested rate plus 10%, but in no case shall the maximum permitted fuel oil firing rate of 34.5 gallons/hour be exceeded. A statement of the oil firing rate during the test shall be included with all test reports. Failure to submit the process rate or operating under conditions that are not representative of normal operating conditions may invalidate the test and fail to provide reasonable assurance. [Rule 62-297.310(2), F.A.C.]

PERMITTEE:  
HOWCO Environmental Services

Permit No.: 1030153-002-AO  
Project: Oil Recycling Operation

**Specific Conditions:**

13. The permittee shall notify the Air Quality Division of the Pinellas County Department of Environmental Management at least 15 days prior to the date on which each formal compliance test is to begin of the date, time, and place of each such test, and the test contact person who will be responsible for coordinating and having such test conducted.  
[Rule 62-297.310(7)(a)9., F.A.C.]

Compliance Documentation and Recordkeeping Requirements

14. In order to document ongoing compliance with the maximum sulfur content and "on-specification" used oil requirements of Specific Condition Nos. 4 and 5, the permittee shall collect a sample from each batch of used No. 5 fuel oil delivered for firing in the oil heater. This sample shall be analyzed for sulfur content and the parameters listed in Specific Condition No. 5 using appropriate EPA or ASTM test methods. As an alternative, a representative oil analysis provided by the used fuel oil supplier may be used to satisfy this requirement provided the certification includes all of the required parameters. Records of the used oil analysis shall be retained for a two year period and made available for inspection upon request. A copy of the most recent used oil analysis shall be submitted with all compliance test reports.  
[Rule 62-4.070(3), F.A.C.]

15. Documentation of compliance with the No. 2 fuel oil sulfur content limitation of Specific Condition No. 4 shall be submitted to the Department with all required compliance test reports. This documentation may take the form of results of a fuel analysis done in accordance with an appropriate ASTM method, or by fuel supplier documentation that the fuel oil delivered for use in the oil heater met the specifications for No. 2 fuel oil. (See Specific Condition No. 16).  
[Rule 62-4.070(3), F.A.C.]

16. In order to document continuing compliance with Specific Condition No. 4, records shall be maintained of the sulfur content, in % by weight, of No. 2 fuel oil delivered for use in the oil-heater. On the basis of the requirements of Department of Agriculture and Consumer Services Rule 5F-2001 (which requires that No. 2 oil sold in Florida have a maximum sulfur content not to exceed 0.5%), reasonable assurance that the sulfur content requirement is being met can also be provided through vendor supplied documentation that the fuel oil delivered for use in the gas turbine meets the above specifications for No. 2 fuel oil. The above records shall be maintained for a minimum of the most recent two year period and made available to the Department upon request. [Rule 62-4.070(3), F.A.C.]

PERMITTEE:  
HOWCO Environmental Services

Permit No.: 1030153-002-AO  
Project: Oil Recycling Operation

**Specific Conditions:**

17. In order to document compliance with Specific Condition No. 4, records shall be kept of each period that "on-specification" used No. 5 oil is fired in the oil heater. These records shall show the date, the hours of operation firing used oil, and the estimated quantity of used oil fired. The above records shall be maintained in a form suitable for inspection, retained for a minimum of a two year period, and made available upon request. [Rule 62-4.070(3), F.A.C.]

Reporting Requirements

18. The permittee shall submit to the Air Quality Division of the Pinellas County Department of Environmental Management each calendar year on or before March 1, a completed (including the Emissions Report section) DER Form 62-213.900(5), "Annual Operating Report for Air Pollutant Emitting Facility," for the preceding calendar year. [Rule 62-210.370(3), F.A.C.]

Permit Renewal

19. At least two applications for an operation permit renewal shall be submitted to the Southwest District Office of the Department, with one copy also submitted to the Air Quality Division of the Pinellas County Department of Environmental Management, no later than April 24, 2001 (60 days prior to the expiration date of this permit). To properly apply for an operation permit, the applicant shall submit the following:

- A. the appropriate application form (DEP Form 62-210.900(2), *Application for Air Permit - Short Form*) noting any deviations from the construction permit application;
- B. the appropriate operation permit amendment fee;

[Rule 62-4.090(1), F.A.C.]

FLORIDA DEPARTMENT OF  
ENVIRONMENTAL PROTECTION

  
W.C. Thomas, P.E.  
District Air Program Administrator

Used Oil Usage Note: This permit allows the burning of used oil which subjects the permittee to DEP Rule 62-710, F.A.C. In brief, this rule requires a registration fee of \$25 if more than 10,000 gallons of used oil is burned annually, along with certain recordkeeping and reporting requirements.

**ATTACHMENT - GENERAL CONDITIONS:**

1. The terms, conditions, requirements, limitations, and restrictions set forth in this permit are "Permit Conditions" and are binding and enforceable pursuant to Sections 403.141, 403.727, or 403.859 through 403.861, Florida Statutes. The permittee is placed on notice that the Department will review this permit periodically and may initiate enforcement action for any violation of these conditions.
2. This permit is valid only for the specific processes and operations applied for and indicated in the approved drawings or exhibits. Any unauthorized deviation from the approved drawings, exhibits, specifications, or conditions of this permit may constitute grounds for revocation and enforcement action by the Department.
3. As provided in Subsections 403.087(6) and 403.722(5), F.S., the issuance of this permit does not convey any vested rights or any exclusive privileges. Neither does it authorize any injury to public or private property or any invasion of personal rights, nor any infringement of federal, state or local laws or regulations. This permit is not a waiver of or approval of any other Department permit that may be required for other aspects of the total project which are not addressed in the permit.
4. This permit conveys no title to land or water, does not constitute State recognition or acknowledgement of title, and does not constitute authority for the use of submerged lands unless herein provided and the necessary title or leasehold interests have been obtained from the State. Only the Trustees of the Internal Improvement Trust Fund may express State opinion as to title.
5. This permit does not relieve the permittee from liability for harm or injury to human health or welfare, animal, or plant life, or property caused by the construction or operation of this permitted source, or from penalties therefore; nor does it allow the permittee to cause pollution in contravention of Florida Statutes and Department rules, unless specifically authorized by an order from the Department.
6. The permittee shall properly operate and maintain the facility and systems of treatment and control (and related appurtenances) that are installed or used by the permittee to achieve compliance with the conditions of this permit, as required by Department rules. This provision includes the operation of backup or auxiliary facilities or similar systems when necessary to achieve compliance with the conditions of the permit and when required by Department rules.
7. The permittee, by accepting this permit, specifically agrees to allow authorized Department personnel, upon presentation of credentials or other documents as may be required by law and at a reasonable time, access to the premises, where the permitted activity is located or conducted to:

**GENERAL CONDITIONS:**

- a. Have access to and copy any records that must be kept under the conditions of the permit;
- b. Inspect the facility, equipment, practices, or operations regulated or required under this permit; and
- c. Sample or monitor any substances or parameters at any location reasonably necessary to assure compliance with this permit or Department rules.

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

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

- a. a description of and cause of non-compliance; and
- b. the period of noncompliance, including dates and times; or, if not corrected, the anticipated time the non-compliance is expected to continue, and steps being taken to reduce, eliminate, and prevent recurrence of the non-compliance.

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

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

10. The permittee agrees to comply with changes in Department rules and Florida Statutes after a reasonable time for compliance, provided, however, the permittee does not waive any other rights granted by Florida Statutes or Department rules.

11. This permit is transferable only upon Department approval in accordance with Florida Administrative Code Rules 62-4.120 and 62-730.300, F.A.C., as applicable. The permittee shall be liable for any non-compliance of the permitted activity until the transfer is approved by the Department.



**GENERAL CONDITIONS:**

12. This permit or a copy thereof shall be kept at the work site of the permitted activity.
13. This permit also constitutes:
  - ( ) Determination of Best Available Control Technology (BACT)
  - ( ) Determination of Prevention of Significant Deterioration (PSD)
  - ( ) Compliance with New Source Performance Standards (NSPS)
14. The permittee shall comply with the following:
  - a. Upon request, the permittee shall furnish all records and plans required under Department rules. During enforcement actions, the retention period for all records will be extended automatically unless otherwise stipulated by the Department.
  - b. The permittee shall hold at the facility or other location designated by this permit records of all monitoring information (including all calibration and maintenance records and all original strip chart recordings for continuous monitoring instrumentation) required by the permit, copies of all reports required by this permit, and records of all data used to complete the application for this permit. These materials shall be retained at least three years from the date of the sample, measurement, report, or application unless otherwise specified by Department rule.
  - c. Records of monitoring information shall include:
    - the date, exact place, and time of sampling or measurements;
    - the person responsible for performing the sampling or measurements;
    - the dates analyses were performed;
    - the person responsible for performing the analyses;
    - the analytical techniques or methods used; and
    - the results of such analyses.
15. When requested by the Department, the permittee shall within a reasonable time furnish any information required by law which is needed to determine compliance with the permit. If the permittee becomes aware that relevant facts were not submitted or were incorrect in the permit application or in any report to the Department, such facts or information shall be corrected promptly.



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

D.E.P.

JUN 18 1996

SOUTHWEST DISTRICT  
TAMPA

June 7, 1996

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

Att: Mr. Richard D. Garrity  
Deputy Assistant Secretary

Re: HOWCO Environmental Services FLD 152764767  
Application Number 50-52-279950  
Used Oil Recycling Facility

Dear Mr. Garrity:

I trust that the enclosed material will answer all your questions and doubts about HOWCO compliance with the requirements of Rules:62-4.540 and 62-710.800 Florida Administrative Code (FAC). Most particularly the enclosed Revision 4 of the Spill Prevention, Control and Countermeasures (SPCC) Plan will provide necessary detail information to determine compliance with all 40 CFR 279 requirements.

Several installations considered to be of research and experimental nature are currently in different stages of progress in our plant, and therefor are not included in the process description, are not on the list of equipment or on the drawings submitted with this General Permit request. When sufficient data are collected and installations fully evaluated the SPCC, all process descriptions and drawings will be revised and resubmitted to the Department as permanent record of all site improvements.

Sincerely yours,

A handwritten signature in cursive script that reads "Tim Hagan".

Tim Hagan  
President

List of Enclosures:

1. Spill Prevention Control and Counter Measures (SPCC) Plan
2. Closure Plan
3. Analysis Plan for HOWCO used oil processing facility
4. Drawings: 0-4-1; 0-4-2; 0-6-1; 0-6-2; 0-8-1 and 0-8-2
5. Volume Calculations and Process Diagram

file 2-b  
8/96



ENVIRONMENTAL SERVICES INC.

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

**FACSIMILE TRANSMITTAL**

DATE: 3-15-96

FROM: Tim Hagan

TO: Bill Crawford

FAX 744-6125

**COMMENTS:**

Please find attached The Second Request for  
Extension of Time to file Petition of Hearing  
Bill if you need Any other Info please call  
ME.

NUMBER OF PAGES (Including this cover sheet): 3

If you do not receive any of the pages, or if you have any other inquiries regarding this facsimile call (813) 323-0818 or facsimile number (813) 323-2249.

Thank you for your business.

843 43rd Street So. • St. Petersburg, FL 33711 • (813) 323-0818 • 1-800-334-6926 • Fax 1-813-323-2249

**STATE OF FLORIDA  
DEPARTMENT OF ENVIRONMENTAL PROTECTION**

**HOWCO ENVIRONMENTAL SERVICES,**

**Petitioner.**

**vs.**

**STATE OF FLORIDA DEPARTMENT  
OF ENVIRONMENTAL PROTECTION,**

**Respondent.**

---

**SECOND REQUEST FOR EXTENSION OF TIME  
TO FILE PETITION OF HEARING**

Pursuant to Florida Administrative Code Rule 62-103.070, Petitioner, Howco Environmental Services requests that the Department extend the time to file a petition for formal administrative hearing regarding a Notice of Denial of General Permit/Used Oil Recycling Facility, FLD 152-764-767, Application S052-279950 (the "Application"). In support of said motion, Petitioner states as follows:

1. On November 21, 1995, Petitioner received a letter from the Department identifying certain alleged deficiencies in Petitioner's Application. Representatives of Petitioner have met with the Department and have prepared additional materials for submission to the Department in support of the Application. Department staff have suggested that a sixty (60) day extension be sought to allow time to review and respond, if necessary, to Petitioner's supplemental materials.
2. Counsel for the Respondent, Chris McGuire, has been contacted and does not object to the extension of time.
3. Based on the foregoing, Petitioner requests an extension of time to file a Petition for Administrative Hearing on the Department's Notice of General Permit Denial/Used Oil Recycling Facility for an additional sixty (60) days until April 22, 1996.

T#410023.1

CARLTON, FIELDS, WARD, EMMANUEL,  
SMITH & CUTLER, P.A.  
One Harbour Place  
Post Office Box 3239  
Tampa, Florida 33601  
(813) 223-7000  
Attorneys for Petitioner

  
\_\_\_\_\_  
Laurel Lockett  
Florida Bar Number: 0462209

**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that a true and correct copy of the foregoing has been  
furnished by hand delivery to Chris McGuire, Esquire, General Counsel's Office,  
Department of Environmental Protection, 2600 Blair Stone Road, Tallahassee, FL  
32301, this 21<sup>st</sup> day of February, 1996.

  
\_\_\_\_\_  
Attorney

cc: Mr. Tim Hagan

T#410623.1



# Department of Environmental Protection

Lawton Chiles  
Governor

Southwest District  
3804 Coconut Palm Drive  
Tampa, Florida 33619

Virginia B. Wetherell  
Secretary

February 19, 1996

Mr. Tim Hagan, President  
HOWCO Environmental Services Inc.  
843 43rd Street South  
St. Petersburg, FL 33711

Dear Mr. Hagan:

Please find enclosed the information you requested during your visit with me.  
I have also enclosed 3 different Closure Plan for your review and use.

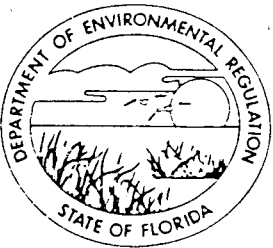
Sincerely,

William C. Crawford  
Permitting Engineer  
Hazardous Waste Program  
Division of Waste Management

WCC/ab  
Enclosures







# Florida Department of Environmental Regulation

Southwest District

Lawton Chiles, Governor

3804 Coconut Palm Dr.

813-744-6100

Tampa, Florida 33619

Virginia Wetherell, Secretary

DATE:

January 18, 1996

TIME:

10:00 AM

SUBJECT:

HOWCO - GENERAL Permit

## A T T E N D E E S

Name

Affiliation

Telephone

Bill Crawford

FDER

813-744-6100 ext 372

Tim Hagan

HOWCO

813-327-8467

V.W. DJORDJEVIC

V.W. DJORDJEVIC P.E.

813-345-0080

Roger Evans

DEP

813-744-6100



ENVIRONMENTAL SERVICES INC.

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

December 5, 1994

RECEIVED  
DEC 06 1994

Department of Environmental Protection  
SOUTHWEST DISTRICT

BY \_\_\_\_\_

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

Dear Bill:

This letter is to confirm our telephone conversation about the specifications for the pick up of used absorbant contaminated with oil and antifreeze. My understanding is that the proper procedure for testing is to test for totals only (EPA Method 9077 for Halogens and 8010-8020 for Volatiles). As long as the results are under your regulatory limits, this is sufficient testing for the handling of these specific waste streams..

I would appreciate it if you would let me know in writing if my understanding is correct. If it is not, please send me the proper procedures.

Thank you for your time. If you have any questions, please don't hesitate to call me.

Yours truly,

*Mike Anderson/jh*

Mike Anderson  
Environmental specialist

MA/jh

file J-5 494

**STATE OF FLORIDA  
DEPARTMENT OF ENVIRONMENTAL PROTECTION**

**HOWCO ENVIRONMENTAL SERVICES,**

Petitioner,

vs.

**STATE OF FLORIDA DEPARTMENT  
OF ENVIRONMENTAL PROTECTION,**

Respondent.

---

**RECEIVED**  
NOV 29 1995

DEPARTMENT OF  
ENVIRONMENTAL PROTECTION  
OFFICE OF GENERAL COUNSEL

**REQUEST FOR EXTENSION OF TIME  
TO FILE PETITION OF HEARING**

Pursuant to Florida Administrative Code Rule 62-103.070, Petitioner, Howco Environmental Services requests that the Department extend the time to file a petition for formal administrative hearing regarding a Notice of Denial of General Permit/Used Oil Recycling Facility, FLD 152-764-767, Application S052-279950 (the "Application"). In support of said motion, Petitioner states as follows:

1. On November 21, 1995, Petitioner received a letter from the Department identifying certain alleged deficiencies in Petitioner's Application. Representatives of Petitioner have conferred with the Department and will meet with the Department to discuss such alleged deficiencies, following which Petitioner will prepare and submit such materials as are appropriate.
2. Counsel for the Respondent, Chris McGuire, has been contacted and does not object to the extension of time.
3. Based on the foregoing, Petitioner requests an extension of time to file a Petition for Administrative Hearing on the Department's Notice of General Permit Denial/Used Oil Recycling Facility for an additional ninety (90) days until February 22, 1996.

T#410823.1

EXHIBIT 1

CARLTON, FIELDS, WARD, EMMANUEL,  
SMITH & CUTLER, P.A.

One Harbour Place  
Post Office Box 3239  
Tampa, Florida 33601  
(813) 223-7000  
Attorneys for Petitioner

  
\_\_\_\_\_  
Laurel Lockett  
Florida Bar Number: 0462209

**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that a true and correct copy of the foregoing has been  
furnished by hand delivery to Chris McGuire, Esquire, General Counsel's Office,  
Department of Environmental Protection, 2600 Blair Stone Road, Tallahassee, FL  
32301, this \_\_\_\_\_ day of November, 1995.

  
\_\_\_\_\_  
Attorney

cc: Mr. Tim Hagan



# Department of Environmental Protection

Lawton Chiles  
Governor

Southwest District  
3804 Coconut Palm Drive  
Tampa, Florida 33619

Virginia B. Wetherell  
Secretary

NOV 20 1995

Tim Hagan  
Howco Environmental Services  
843 43<sup>rd</sup> Street South  
St. Petersburg, Florida 33711

RE: Howco Environmental Services, FLD 152 764 767  
Application Number SO52-279950  
Used Oil Recycling Facility  
Denial of the use of a General Permit

Dear Mr. Hagan:

The Florida Department of Environmental Protection (FDEP) has completed its review of the referenced Notice to Use A General Permit received by our office on November 3, 1995. The general permit requirements for a used oil recycling facility are specified in Rule 62-4.540 and 62-710.800, Florida Administrative Code (FAC). This is to notify you that your submittal does not qualify to use the general permit.

Reasonable assurance has not been provided to indicate that the facility will be operated and maintained in accordance with the requirements of FAC Rule 62-710.800 for the following reasons:

1. The description of the facility emergency procedures contained in the closure plan does not contain the information necessary to determine compliance with 40 CFR 279.52(a).
2. The closure plan references a Spill Prevention, Control and Countermeasures (SPCC) Plan. The SPCC plan was not submitted and therefore not available for review to determine compliance with 40 CFR 279.52(b).
3. The description of prequalification procedures does not specify the "positive" values of the sniffer or Dexsil 4000 test, and lack consistency between the information contained in the General Permit Renewal and Closure Plan.
4. The description of the facility operations does not contain the information on the tanks and secondary containment system necessary to determine compliance with 40 CFR 279.54. This information must be signed, sealed and dated by a professional engineer registered in the state of Florida in accordance with 62-4.050(3) FAC and include at a minimum:

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*File 1-b  
2/95*

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- a. The size of each tank (diameter and height), manufacturer's specification sheets for pre-fabricated tanks, and tank anchoring details should be provided. Details on pump locations and piping should be provided. The inspection procedures and management practices to ensure the integrity of the tanks should be provided (40 CFR 279.54(a) and (b)).
  - b. Details of the secondary containment should be provided. The information should address slab and wall thickness, containment sealant or lining, penetrations through the containment, and storage capacity calculation should be provided (40 CFR 279.54(d)).
  - c. Operation procedures or methods for managing spills should be provided (40 CFR 279.54(g)).
  - d. Documentation of tank registration in accordance with 62-762 FAC should be provided.
5. The closure plan, as submitted, does not demonstrate how the facility will be closed to meet the standards of 62-710.800(3)(a) or 40 CFR 279.54(h).
  6. The waste analysis plan, as submitted, does not address all the requirements of 40 CFR 279.55.
  7. The description of the manifest system and the operating record do not document compliance with 62-710.510(1) FAC and 40 CFR 279.56(a)(6).
  8. The description of the operating record does not establish compliance with the records retention requirements of 40 CFR 279.57.
  9. The description of the operating procedures does not demonstrate compliance with the residue managing requirements of 40 CFR 279.59.

Any proposed used oil recycling facility which does not meet the requirements for a general permit shall require a standard solid waste disposal site permit from the Department, or upon resolution of the above discrepancies, again notify the Department of their intent to use the general permit.

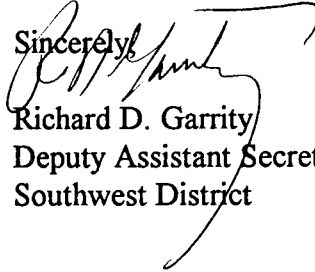
Persons whose substantial interest are affected by this permit have a right, pursuant to Section 120.57 Florida Statutes (FS), to petition for an administrative determination (hearing) on it. The petition must conform to the requirements of Chapters 62-103a and 28-5.201 FAC., and must be filed (received) in the Department's Office of General Counsel, Department of Environmental Protection, 3900 Commonwealth Boulevard, MS #35, Tallahassee, Florida 32399-3000, within fourteen (14) days or receipt of this notice.

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Failure to file a petition within fourteen (14) days constitutes a waiver of any right such person has to an administrative determination (hearing) pursuant to Section 120.57 FS. This permit is final and effective on the date filed with the Clerk of the Department unless a request for extension of time specified for filing a petition and conforms to Rule 62-103.070, FAC. Upon timely filing of a petition or a request for an extension of time this permit will not be effective until further Order of the Department.

When the Order (Permit) is final, any party to the Order has the right to seek judicial review of the Order pursuant to Section 120.68 Florida Rules of Appellate Procedure, with the Clerk of the Department in the Office of General Counsel, 3900 Commonwealth Boulevard, Tallahassee, Florida 32399-3000; and by filing a copy of the Notice of Appeal accompanied by the applicable filing fees with the appropriate District Court of Appeal. The Notice of Appeal must be filed within 30 days from the date the Final Order is filed with the Clerk of the Department.

Sincerely,



Richard D. Garrity  
Deputy Assistant Secretary  
Southwest District

Attachment

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





ENVIRONMENTAL SERVICES

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

October 31, 1995

Ms. Stephanie Hinson  
State of Florida  
Department of Environmental Protection  
3804 Coconut Palm Drive  
Tampa, FL 33619

re: General Permit Renewal

Dear Ms. Hinson:

Enclosed please find the Used Oil Processing Facility General Permit Renewal and Closure Plan for HOWCO Environmental Services. Also enclosed is a Check No. 18931, in the amount of \$100.00.

If you should have any questions, please feel free to contact me at 813-327-8467.

Sincerely,

HOWCO Environmental Services

*Cathy Clemson*  
Cathy Clemson  
Controller

Enclosures

RECEIVED  
NOV 02 1995  
Department of Environmental Protection  
BY SOUTHWEST DISTRICT

*for 1-13  
1/95*